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Site Name STAPLES, L.P.

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Box SF1236

AccessLevel PUBLIC

Division WASTE MANAGEMENT

Section SUPERFUND

Program IHS (IHS)

DocCat FACILITY

MAIL TO Whitley & Washington, Attorneys, P.O. Box 569, High Point, N. C. 27261

This Deed, Made this 19 day of December, 19 67, by and between H.E. Powers and wife Gloria Powers; R.E. Powers and wife Mary Louise Powers of Los Angeles County and State of California, hereinafter called Grantor, and Powers Wire Products Co., Inc., a California Corporation, hereinafter called Grantee.

WITNESSETH: That the Grantor, for and in consideration of the sum of Ten Dollars and other good and valuable consideration to him in hand paid by the Grantee, the receipt whereof is hereby acknowledged, has given, granted, bargained, sold and conveyed, and by these presents does give, grant, bargain, sell, convey and confirm unto the Grantee, his heirs and/or successors and assigns, premises in Jamestown Township, Guilford County, North Carolina, described as follows:

BEGINNING at an iron pin in the eastern right of way line of Ragsdale Road, said iron pin being located North 24° 45' 30" East 275 feet from a new iron pin in the river bank of Deep River, in the Town of Jamestown, and running thence along said right of way line of Ragsdale Road, North 24° 45' 30" East 412.55 feet (crossing the southern right of way line of the Southern Railroad) to a new iron pin in the center line of the old northbound track of the Southern Railroad; and running thence North 61° 15' 30" East along the center line of the old northbound track of the Southern Railroad, 156.76 feet to an existing Tee iron; and running thence along the Union Bag Camp Paper Corporation line South 23° 02' East 568.92 feet (crossing the southern right of way line of the Southern Railroad) to an existing concrete monument; running thence along the W. G. Ragsdale line South 52° 11' 20" West 245.54 feet to an existing iron pin; thence continuing along the W. G. Ragsdale line South 52° 11' 20" West 17.93 feet to an iron pin; thence North 54° 06' 10" West 400.76 feet to the point and place of beginning; as per map designated as "Property of W. G. Ragsdale Estate" dated August 18, 1964, revised October 26, 1964, and March 15, 1966, by Southern Mapping and Engineering Co., Greensboro, North Carolina, Job No. A-173-64.

25582

555 127 441 00007.00 00

555 127 441 00000.25 FF

The above land was conveyed to Grantor by Mary R. Strickland et vir, et al, See Book No. 2283, Page 601

TO HAVE AND TO HOLD The above described premises, with all the appurtenances thereunto belonging, or in any wise appertaining, unto the Grantee, his heirs and/or successors and assigns forever.

And the Grantor covenants that he is seized of said premises in fee, and has the right to convey the same in fee simple; that said premises are free from encumbrances (with the exceptions above stated, if any); and that he will warrant and defend the said title to the same against the lawful claims of all persons whomsoever.

When reference is made to the Grantor or Grantee, the singular shall include the plural and the masculine shall include the feminine or the neuter.

IN WITNESS WHEREOF, The Grantor has hereunto set his hand and seal, the day and year first above written.

R. E. Powers (SEAL) H. E. Powers (SEAL)

Mary Louise Powers (SEAL) Gloria Powers (SEAL)

STATE OF CALIFORNIA - Los Angeles County

I, Joe T. Noe, a Notary Public of said County, do hereby certify that H. E. Powers and wife Gloria Powers Grantor, personally appeared before me this day and acknowledged the execution of the foregoing deed.

Witness my hand and notarial seal, this the 19th day of December

My Commission Expires Joe T. Noe N. P.

STATE OF CALIFORNIA - Los Angeles County

I, Joe T. Noe, a Notary Public of said County, do hereby certify that R. E. Powers and wife Mary Louise Powers Grantor, personally appeared before me this day and acknowledged the execution of the foregoing deed.

Witness my hand and notarial seal, this the 19th day of December

My Commission Expires: JOE T. NOE My Commission Expires Jan. 1, 1968 Joe T. Noe

STATE OF NORTH CAROLINA - GUILFORD COUNTY

The foregoing certificate of Joe T. Noe, N.P. of Los Angeles Co. Calif. are certified to be correct. This APR 12 1968

Mark Stewart, Register of Deeds, Guilford County, N. C.

Recording Fee paid
Probate Fee paid

By Mary Belle Atkins Deputy Register of Deeds

This Deed drawn by Whitley and Washington, P. O. Box 569, High Point, North Carolina

PRESENTED FOR REGISTRATION AND RECORDED

APR 12 2 PM '68

MARK STEWART REGISTER OF DEEDS GUILFORD COUNTY, N.C.

BOOK 2368 PAGE 665

SETH R. COHEN
ATTORNEY AT LAW

SMITH, FOLLIN & JAMES
ATTORNEYS AND COUNSELLORS AT LAW
P.O. BOX 990
GREENSBORO, N.C. 27402

101 S. ELM ST., 3RD FLOOR
GREENSBORO, N.C. 27401
PHONE: (919) 274-2992
FAX: (919) 274-8490

NORTH CAROLINA

GUILFORD COUNTY

THIS DEED, Made this 20th day of June, 1966, by and between MARY R. STRICKLAND and husband, SAMUEL H. STRICKLAND, LUCY R. HEILIG (WIDOW), VIRGINIA R. COX and husband, JOSEPH J. COX, WILLIAM G. RAGSDALE, JR. and wife, MARY E. RAGSDALE, EMILY RAGSDALE (SINGLE), and THOMAS C. RAGSDALE and wife, MARGARET H. RAGSDALE, of Guilford County and State of North Carolina, hereinafter called Grantors, and M. E. POWERS and R. E. POWERS, of Los Angeles County, and State of California, hereinafter called Grantees.

W I T N E S S E T H :

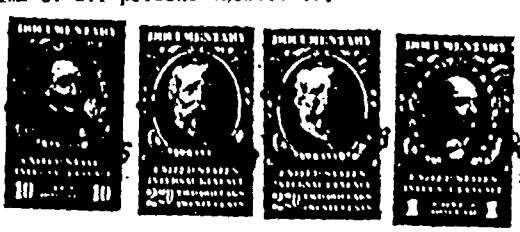
That the Grantors, for and in consideration of the sum of Ten ($10.00) Dollars and other good and valuable considerations to them in hand paid by the Grantees, the receipt whereof is hereby acknowledged, have given, granted, bargained, sold and conveyed, and by these presents do give, grant, bargain, sell, convey and confirm unto the Grantees, their heirs and/or successors and assigns, premises in Jamestown Township, Guilford County, North Carolina, described as follows:

BEGINNING at an iron pin in the eastern right of way line of Ragsdale Road, said iron pin being located North 24° 45' 30" East 27½ feet from a new iron pin in the river bank of Deep River, in the Town of Jamestown, and running thence along said right of way line of Ragsdale Road, North 24° 45' 30" East 512.55 feet (crossing the southern right of way line of the Southern Railroad) to a new iron pin in the center line of the old northbound track of the Southern Railroad; and running thence North 61° 15' 30" East along the center line of the old northbound track of the Southern Railroad, 156.76 feet to an existing Tee iron; and running thence along the Union Bag Camp Paper Corporation line South 23° 07' East 968.92 feet (crossing the Southern right of way line of the Southern Railroad) to an existing concrete monument; running thence along the W. G. Ragsdale line South 52° 11' 20" West 249.54 feet to an existing iron pin; thence continuing along the W. G. Ragsdale line South 52° 11' 20" West 17.93 feet to an iron pin; thence North 54° 06' 10" West 500.76 feet to the point and place of beginning; as per map designated as "Property of W. G. Ragsdale Estate" dated August 18, 1964, revised October 26, 1964, and March 15, 1966, by Southern Mapping and Engineering Co., Greensboro, North Carolina, Job No. A-173-64.

TO HAVE AND TO HOLD the above described premises, with all the appurtenances thereunto belonging, or in any wise appertaining, unto the Grantees, their heirs and/or successors and assigns forever.

And the Grantors covenant that they are seized of said premises in fee, and have the right to convey the same in fee simple; that said premises are free from encumbrances (with the exceptions above stated, if any); and that they will warrant and defend the said title to the same against the lawful claims of all persons whomsoever.

MARTIN WHITLEY AND WASHINGTON LAW OFFICES HIGH POINT N. C.



C# 0211262

NAME CHANGED FROM: POWER-LINE SALES, INC. TO POWER LINE FASTENING SYSTEMS, INC. ON 11-19-80. WHICH WAS THEN CHANGED

TO: FASTENING LIQUIDATION, INC.

ON: 6-30-86.

State of California
OFFICE OF THE SECRETARY OF STATE

I, *MARCH FONG EU*, Secretary of State of the State of California, hereby certify:

That the annexed transcript has been compared with the record on file in this office, of which it purports to be a copy, and that same is full, true and correct.

IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this

NOV 19 1980

March Fong Eu

Secretary of State

CERTIFICATE OF AMENDMENT

OF

ARTICLES OF INCORPORATION

ENDORSED
FILED
In the office of the Secretary of State
of the State of California
NOV 19 1980
MARCH FONG EU, Secretary of State
By BILL HOLDEN
Deputy

Frank B. Nance and William M. McPherson certify that:

1. They are the president and the secretary, respectively, of Power-Line Sales, Inc., a California corporation.

2. Article I of the articles of incorporation of this corporation is amended to read as follows:

"The name of this corporation is Power Line Fastening Systems, Inc."

3. The foregoing amendment of articles of incorporation has been duly approved by the board of directors.

4. The foregoing amendment of articles of incorporation has been duly approved by the required vote of shareholders in accordance with Section 902 of the Corporations Code. The total number of outstanding shares of the corporation is 39,600 of Class B shares, 450,000 of Class A shares and the number of shares voting in favor of the amendment equaled or exceeded the vote required. The percentage vote required was more than 50% of the Class B shares.

Frank B. Nance, President

William M. McPherson, Secretary

BK3268 PG1022

The undersigned declare under penalty of perjury that the matters set forth in the foregoing certificate are true of their own knowledge. Executed at El Monte, California on October 28, 1980.

Frank B. Nance

William M. McPherson

BK3268 PG1023
1023

86-3571716

State of California
March Fong Eu
Secretary of State

P.O. Box 2630
Sacramento, CA 95812
Phone: (916) 445-2020

STATEMENT BY DOMESTIC STOCK CORPORATION

(THIS STATEMENT MUST BE FILED WITH CALIFORNIA SECRETARY OF STATE (SEC. 1502, CORPORATIONS CODE)

FILED
In the office of the Secretary of State
of the State of California
Oct 1 '86

DO NOT WRITE IN THIS SPACE

WHEN COMPLETING FORM, PLEASE USE BLACK TYPEWRITER RIBBON OR BLACK INK

1. 2112020 DUE DATE 11-30-86 11775S

FASTENING LIQUIDATION, INC.
10180 E. VALLEY BLVD.
EL MONTE, CA 91734

DO NOT ALTER PREPRINTED NAME. IF ITEM NO. 1 IS BLANK, PLEASE ENTER CORPORATE NAME

THE UNDERSIGNED [illegible] MAKES THE FOLLOWING STATEMENT

2. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE 10180 E. Valley Blvd	ROOM NO.	2A. CITY & STATE El Monte CA	2B. ZIP CODE 91731
3. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY /	ROOM NO.	3A. CITY CA	3B. ZIP CODE
4. MAILING ADDRESS 10180 E. Valley Blvd	ROOM NO.	4A. CITY & STATE El Monte CA	4B. ZIP CODE 91731

THE NAMES AND COMPLETE ADDRESSES OF ALL

5. CHIEF EXECUTIVE OFFICER F.B. NANCE	5A. BUSINESS OR RESIDENCE ADDRESS 10180 E. VALLEY BLVD	5B. CITY & STATE El Monte CA	5C. ZIP CODE 91731
6. SECRETARY WM MCPHERSON	6A. BUSINESS OR RESIDENCE ADDRESS 10180 E. VALLEY BLVD	6B. CITY & STATE El Monte CA	6C. ZIP CODE 91731
7. CHIEF FINANCIAL OFFICER WM. MCPHERSON	7A. BUSINESS OR RESIDENCE ADDRESS 10180 E VALLEY BLVD	7B. CITY & STATE El Monte CA	7C. ZIP CODE 91731

ALL DIRECTORS, INCLUDING [illegible] ARE ALSO OFFICERS (Attach additional sheet if necessary)

8. NAME F.B. NANCE GEORGE D ROBERTS	8A. BUSINESS OR RESIDENCE ADDRESS 10180 E. VALLEY BLVD	8B. CITY & STATE El Monte CA	8C. ZIP CODE 91731
9. NAME ROBERT J MACDONNELL	9A. BUSINESS OR RESIDENCE ADDRESS SAME	9B. CITY & STATE	9C. ZIP CODE
10. NAME JEROME KOHLBERG JR	10A. BUSINESS OR RESIDENCE ADDRESS SAME	10B. CITY & STATE	10C. ZIP CODE

11. THE NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY: [illegible]

DESIGNATED AGENT FOR SERVICE OF PROCESS (Only one agent may be designated)

12. NAME WM. MCPHERSON

13. CALIFORNIA BUSINESS OR RESIDENCE ADDRESS IF AGENT IS AN INDIVIDUAL (DO NOT USE P.O. BOX) DO NOT INCLUDE ADDRESS IF AGENT IS A CORPORATION
10180 E. Valley Blvd El Monte CA 91731

14. DESCRIBE TYPE OF BUSINESS OF THE CORPORATION
[illegible]

15. I DECLARE THAT I HAVE EXAMINED THIS STATEMENT AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IT IS TRUE, CORRECT AND COMPLETE

WM MCPHERSON — TYPE OR PRINT NAME OF SIGNING OFFICER OR AGENT
[signature] — SIGNATURE
10-1-86 — DATE

16. I DECLARE THERE HAS BEEN NO CHANGE IN THE INFORMATION CONTAINED IN THE LAST STATEMENT OF THE CORPORATION WHICH IS ON FILE IN THE SECRETARY OF STATE'S OFFICE. DO NOT ATTACH AS INITIAL FILING (READ INSTRUCTIONS BEFORE COMPLETING THIS ITEM)

[ ] (CHECK HERE) — TYPE OR PRINT NAME OF SIGNING OFFICER OR AGENT — SIGNATURE — DATE

12

85 9290

40-700 (REV 7-85)

01/21/94 SSCPS27 STATUS INQUIRY PAGE 1 08:08:37.
CPOISTA3

NAME FASTENING LIQUIDATION, INC.

NAME CHANGED FROM POWER LINE FASTENING SYSTEMS, INC. ON 06/30/1986

CORP NO C0211262 INC. DATE 11/04/1946 STATUS DISSOLVED 12/30/1986
DOMESTIC STOCK CLASS
NO OF PAGES 00 ST/CTRY

STMNT/OFFICERS LAST COMPLETE C DATE 10/01/86 NO 0397718
COMPL/NC C DATE 09/23/85 NO 0372914
OFFICERS CERT EXEMPTION CODE DATE NO A/P

PRINCIPAL EXECUTIVE ADDR

CITY/ST/CNTRY
ZIP

CALIFORNIA ADDRESS

CITY CA

MAILING ADDRESS
10180 E VALLEY BLVD

CITY/ST/CNTRY EL MONTE CALIFORNIA
ZIP 91731

PRES NAME F B NANCE
ADDRESS 10180 E VALLEY BLVD

CITY/ST/CNTRY EL MONTE CA
ZIP 91731

AGENT NAME W M MC PHERSON
ADDRESS 10180 E VALLEY BLVD

CITY EL MONTE CA 91731

TYPE OF BUSINESS
ENTR=CONTINUE PF2=HISTORY PF3=BACK TO WORKSCREEN PF10=MAIN MENU

p/w
whitley

STATE OF NORTH CAROLINA
Real Estate Excise Tax
980.00
JUN30'86 RB.10471

18847.2

RECORDED
KAY F. PATSEAVOURAS
REGISTER OF DEEDS
GUILFORD COUNTY NC
JUN 30 1 44 PM '86

980

Excise Tax

Recording Time, Book and Page

Tax Lot No. ..... Parcel Identifier No. 05/30/86

Verified by ..... County on the ..... 1 DEEDS 18847.2 ..... 194.00

by ..... 2 DEEDS ADDN PAGE(S) 3.00

1 PROBATE FEE 1.00

Mail after recording to ~~Thomas S. Stukes, P. O. Box 21927, Greensboro, NC 27420~~

This instrument was prepared by Thomas S. Stukes, Atty.

Brief description for the Index

NORTH CAROLINA GENERAL WARRANTY DEED

THIS DEED made this 31st day of May, 1986, by and between

GRANTOR	GRANTEE
Power-Line Fastening Systems, Inc. (formerly Power Line Sales, Inc.), a California corporation 10180 East Valley Boulevard El Monte, California 91731	Spenax Corporation, an Indiana corporation 860 Elston Drive Shelbyville, Indiana 46176 1 EXCISE TAX STAMP 980.00

Enter in appropriate block for each party: name, address, and, if appropriate, character of entity, e.g. corporation or partnership.

The designation Grantor and Grantee as used herein shall include said parties, their heirs, successors, and assigns, and shall include singular, plural, masculine, feminine or neuter as required by context.

WITNESSETH, that the Grantor, for a valuable consideration paid by the Grantee, the receipt of which is hereby acknowledged, has and by these presents does grant, bargain, sell and convey unto the Grantee in fee simple, all that certain lot or parcel of land situated in the City of Jamestown, Jamestown Township, Guilford County, North Carolina and more particularly described as follows:

See Exhibit A attached hereto.

BK3512PG1916

EXHIBIT A

BEGINNING at an iron pin in the eastern margin of Ragsdale Road, which iron pin is located 8 feet 6 inches from the eastern edge of the pavement of said road and also located South 24 deg. 46' 59" West 652.55 feet from the southern edge of the pavement of U.S. 29A - 70A in the Town of Jamestown, North Carolina, and running thence along the margin of said road, crossing the Southern Railway right-of-way line, North 24 deg. 46'59" East 412.55 feet to an existing iron stake 15 feet from the existing Southern Railway track; thence North 61 deg. 17' 25" East 156.65 feet to an existing iron stake; thence along the line of Union Camp Paper Corporation, and crossing the Southern Railway right-of-way line South 23 deg. 00' 05" East 568.92 feet to an iron pin; thence South 52 deg. 10' 45" W 263.46 feet to an existing iron pin; thence along the line of W. G. Ragsdale North 54 deg. 03' 11" West 400.39 feet to the point and place of Beginning, containing 4.656 acres more or less, as per map designated as Property of Power-Line Sales, Inc., prepared by Davis-Martin & Associates, Inc., Engineers, dated October 17, 1975, Revised November 7, 1975, Revised January 25, 1983, Job No. S-9973.

The above property is subject to an easement and right of way for ingress, egress and regress over, across and through the above described property, which easement is described as follows: BEGINNING at an iron pin, the northeast corner of that property conveyed to Powers Wire Products, Co., Inc. (now Power Line Fastening Systems, Inc.) by deed recorded in Book 2366, at Page 665, and also being a corner of Union Camp Paper Corp., said iron pin also being South 23 deg. 00' 05" East 568.92 feet from an iron pin which is 15 feet east of the existing Souther Railway track; running thence along the line of Union Camp Paper Corp. North 23 deg. 00' 05" West 448.92 feet to a point in the south line of that easement described in Book 2134, at Page 741; running thence along the south side of that easement described in Book 2134, at Page 741 South 61 deg. 17' 25" West 40.20 feet to a point on the south side of said easement described in Book 2134, at Page 741; running thence South 23 deg. 00' 05" East 455.50 feet to a point in the east line of that tract of land conveyed to Powers Wire Products Co., Inc., (now Power Line Fastening Systems, Inc.) by deed recorded in Book 2366, at Page 665; running thence North 52 deg. 10' 45" East 41.38 feet to the point and place of BEGINNING. The same being a 40 foot easement along the north line of that property described in Book 2366, at Page 665.

Prepared by Edward H. Post, Atty.
& Mail To PO Box 2756
High Point, NC
27261

Pick Up
Ed Post

SPECIAL CORPORATION WARRANTY DEED

Grantee's address: 10 East 69th Street
New York, NY 10021
Attn: A. A. Rosen

This Special Corporation Warranty Deed made as of this 28th day of April, 1987 by and between Spenax Corporation, an Indiana corporation, hereinafter called Grantor, and Jaygee Realty Co. and Elbo Realty Co., New York partnerships hereinafter called Grantee.

04-30-87
1 DEEDS 249115 4.00

WITNESSETH, that the Grantor, for and in consideration of Ten Dollars and other good and valuable consideration to it in hand paid by the Grantee, the receipt hereof is hereby acknowledged, hereby conveys and specially warrants unto the Grantee, his heirs and/or successors and assigns, the real estate described in the attached Exhibit A, incorporated herein by reference.

4 DEEDS ADDN PAGE(S) 6.00

The warranty of title by Grantor is limited to a warranty against the acts of Grantor and those claiming by, through, or under Grantor and not otherwise, and such warranty is subject to the following exceptions:

1 PROBATE FEE 1.00

1. Real estate taxes not yet due and payable.

2. All easements, encumbrances, restrictions, encroachments, rights-of-way, and covenants of record.

1 EXCISE TAX STAMP 1500.00

3. Anything which would have been disclosed by an accurate survey of the property.

Real Estate Excise Tax 990.00 APR30'87

STATE OF NORTH CAROLINA

The undersigned persons executing this deed on behalf of Grantor represent and certify that they are duly elected officers of Grantor and have been fully empowered, by proper resolution of the Board of Directors of Grantor, to execute and deliver this deed; that Grantor has full corporate capacity to convey the real estate described herein; and that all necessary corporate action for the making of such conveyance has been taken and done.

The above land was conveyed to Grantor by Warranty Deed. See Instrument No. 188472, Book 3512, Page 1916.

IN WITNESS WHEREOF, the Grantor has caused this deed to be executed by its duly authorized officers and its seal to be hereunto affixed, the day and year first above written.

STATE OF NORTH CAROLINA Real Estate Excise Tax APR30'87 501.00

SPENAX CORPORATION, an Indiana corporation

By _____
David E. Greene
Vice President

ATTEST:

_____
Robert A. Kassing
Assistant Secretary

BK3582PG1870

REAL ESTATE DESCRIPTION

BEGINNING at an iron pin in the eastern margin of Ragsdale Road, which iron pin is located 8 feet 6 inches from the eastern edge of the pavement of said road and also located South 24 deg. 46' 59" West 652.55 feet from the southern edge of the pavement of U.S. 29A - 70A in the Town of Jamestown, North Carolina, and running thence along the margin of said road, crossing the Southern Railway right-of-way line, North 24 deg. 46'59" East 412.55 feet to an existing iron stake 15 feet from the existing Southern Railway track; thence North 61 deg. 17' 25" East 156.65 feet to an existing iron stake; thence along the line of Union Camp Paper Corporation, and crossing the Southern Railway right-of-way line South 23 deg. 00' 05" East 568.92 feet to an iron pin; thence South 52 deg. 10' 45" W 263.46 feet to an existing iron pin; thence along the line of W. G. Ragsdale North 54 deg. 03' 11" West 400.39 feet to the point and place of Beginning, containing 4.656 acres more or less, as per map designated as Property of Power-Line Sales, Inc., prepared by Davis-Martin & Associates, Inc., Engineers, dated October 17, 1975, Revised November 7, 1975, Revised January 25, 1983, Job No. 5-9973.

The above property is subject to an easement and right of way for ingress, egress and regress over, across and through the above described property, which easement is described as follows: BEGINNING at an iron pin, the northeast corner of that property conveyed to Powers Wire Products, Co., Inc. (now Power Line Fastening Systems, Inc.) by deed recorded in Book 2366, at Page 665, and also being a corner of Union Camp Paper Corp., said iron pin also being South 23 deg. 00' 05" East 568.92 feet from an iron pin which is 15 feet east of the existing Southern Railway track; running thence along the line of Union Camp Paper Corp. North 23 deg. 00' 05" West 448.92 feet to a point in the south line of that easement described in Book 2134, at Page 741; running thence along the south side of that easement described in Book 2134, at Page 741 South 61 deg. 17' 25" West 40.20 feet to a point on the south side of said easement described in Book 2134, at Page 741; running thence South 23 deg. 00' 05" East 455.50 feet to a point in the east line of that tract of land conveyed to Powers Wire Products Co., Inc., (now Power Line Fastening Systems, Inc.) by deed recorded in Book 2366, at Page 665; running thence North 52 deg. 10' 45" East 41.38 feet to the point and place of BEGINNING. The same being a 40 foot easement along the north line of that property described in Book 2366, at Page 665.

BK3582PG1872

Exhibit A

FILED
U.S. DISTRICT COURT
INDIANAPOLIS DIVISION

JAN 15 1993

SOUTHERN DISTRICT OF INDIANA
JOHN A. O'NEAL
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JAYGEE REALTY CO., a New York General Partnership, and EFBE REALTY CO., a New York General Partnership,

Plaintiffs,

v.

ROBERT J. COULTER; VIRGINIA COULTER; DAVID E. GREENE; SHEILA G. GREENE; ROBERT P. KASSING; STAPLES, an Indiana Limited Partnership, and STAPLES, INC.

Cause No. IP 92-948-C

AMENDED COMPLAINT

Plaintiffs, complaining of defendants, allege and say:

1. Plaintiffs are general partnerships organized and existing under the laws of the state of New York.

2. Defendants Robert J. Coulter and Virginia Coulter are husband and wife and are citizens and residents of Shelby County, Indiana.

3. Defendants David E. Greene and Sheila G. Greene are husband and wife and are citizens and residents of Shelby County, Indiana.

4. Defendant Robert P. Kassing is a citizen and resident of Marion County, Indiana.

5. Defendant Staples is a limited partnership organized and existing under the laws of the state of Indiana.

6. Defendant Staples, Inc., is a corporation organized and existing under the laws of the state of Indiana.

7. Jurisdiction of this action is founded upon 28 U.S.C. § 1331 and 28 U.S.C. § 1441, together with 28 U.S.C. § 1367(a) and 28 U.S.C. § 1441(c). This action was commenced in the Superior Court of Guilford County, North Carolina, by plaintiffs, but was removed by defendants to the United States District Court for the Middle District of North Carolina, from whence it was transferred to this court.

8. On or about April 27, 1987, plaintiffs entered into a lease agreement with Spenax Corporation, for lease by plaintiffs to Spenax Corporation of a manufacturing and warehouse facility located in Jamestown, Guilford County, North Carolina. The lease agreement was for a term of ten years and provided for monthly rental payments in the amount of $14,250.00, to be increased to $16,500.00 per month at the beginning of the sixth year of the lease. The lessee agreed in the lease agreement to pay for all taxes, insurance, repairs, maintenance, and all other operating expenses of the leased property. The agreement provided that the lease would be governed by the laws of the state of North Carolina.

9. Spenax Corporation purportedly assigned all of its rights under the lease agreement to the limited partnership Staples on or about December 30, 1988. Thereafter, Staples or its assignee continued making lease payments to plaintiffs to and including the payment due for the month of February, 1991.

10. At all material times, defendants Robert J. Coulter and David E. Greene have been the sole shareholders of Spenax Corporation.

11. At all material times, defendant Staples, Inc., has been the nominal general partner of the limited partnership Staples.

12. At all material times, defendants Robert J. Coulter and David E. Greene, although nominally limited partners of the limited partnership Staples, have acted as general manager and assistant general manager, respectively, of that partnership, have held themselves out as managing partners, and have been reasonably perceived by plaintiffs to be the general partners of that partnership.

13. At all material times, defendant Robert P. Kassing, dominated, controlled, and manipulated the affairs of defendant Staples, Inc., so that this nominal corporation was in reality an extension of his own personality and his alter ego.

FIRST CAUSE OF ACTION FOR FRAUD

14. Plaintiffs reallege all of the allegations contained in paragraphs 1 through 13 hereof, as fully as if again set forth herein.

15. Defendants Robert J. Coulter, David E. Greene, and Robert P. Kassing caused Spenax Corporation to adopt a plan of liquidation under Indiana law on or about December 7, 1988.

16. No notice whatever was given to plaintiffs, any persons acting on their behalf, or the general public of the plan of liquidation of Spenax Corporation and its impending dissolution, even though defendants had actual knowledge at all times of plaintiffs' names and addresses, and full details of their rightful claims against Spenax Corporation.

17. The only notice that defendants gave of liquidation and dissolution of Spenax Corporation was by means of a legal advertisement in The Shelbyville News, which publication was calculated not to be likely to come to the attention of plaintiffs, persons acting on behalf of plaintiffs, and the general public.

18. Defendants Robert J. Coulter, David E. Greene, and Robert P. Kassing were the recipients and distributees of all of the assets of Spenax Corporation, including $1,147,266 distributed to defendant Coulter, $764,844 distributed to defendant Greene, and approximately $200,000 in legal fees and other payments made to defendant Kassing and his firm.

19. The lease agreement between plaintiffs and Spenax Corporation provided in paragraph 10(d), that the lessee's dissolution or other termination of its corporate charter constituted a default of the lease agreement, for which plaintiffs were entitled a remedy.

20. The agreement between Spenax Corporation and Staples for the transfer of assets including the lease of plaintiffs' real estate, contained the provision that Staples was not assuming any liabilities or obligations of Spenax Corporation under the lease agreement with plaintiffs.

21. The liquidation and dissolution of Spenax Corporation and the agreement that Staples was not assuming liabilities under the lease were existing facts as of the time they occurred.

22. The liquidation and dissolution of Spenax Corporation and the agreement that Staples was not assuming liabilities under the

lease were facts material to plaintiffs, in that had they known these facts, plaintiffs could have taken reasonable steps to protect their interests with regard to the lease.

23. Defendants had a duty to communicate to plaintiffs the facts of dissolution and liquidation of Spenax Corporation and the agreement that Staples was not assuming liabilities under the lease.

24. Defendants Robert J. Coulter, David E. Greene, and Robert P. Kassing, acting individually and as agents and servants of defendant Staples and defendant Staples, Inc., maintained silence, and concealed from plaintiffs the facts of dissolution and liquidation of Spenax Corporation and the agreement that Staples was not assuming liabilities under the lease.

25. Defendants intended that plaintiffs rely on the absence of knowledge, or concealment, of the facts of dissolution and liquidation of Spenax Corporation and the agreement that Staples was not assuming liabilities under the lease.

26. Plaintiffs reasonably and justifiably relied on the belief that Spenax Corporation had not been dissolved and liquidated and that defendant Staples had assumed the liabilities of Spenax Corporation under the lease agreement.

27. The facts of the dissolution and liquidation of Spenax Corporation and the agreement that Staples was not assuming liabilities under the lease were not discoverable by plaintiffs in the exercise of reasonable diligence.

28. Proximately, directly, and solely as a result of defendants' fraudulent concealments, plaintiffs have been injured and damaged, by being deprived of the rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

SECOND CAUSE OF ACTION FOR UNFAIR TRADE PRACTICE

29. Plaintiffs reallege all of the allegations contained in paragraphs 1 through 13 and 15 through 28 hereof, as fully as if again set forth herein.

30. The foregoing conduct on the part of defendants constitutes unfair and deceptive acts and practices affecting commerce, in violation of N.C.G.S. § 75-1.1(a).

31. Proximately, directly, and solely as a result of defendants' commission of unfair and deceptive acts and practices affecting commerce, plaintiffs have been injured and damaged, by being deprived of the rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

THIRD CAUSE OF ACTION AGAINST DISTRIBUTEES OF THE PROPERTY OF SPENAX CORPORATION

32. Plaintiffs reallege all of the allegations contained in paragraphs 1 through 13 and 15 through 18 hereof, as fully as if again set forth herein.

33. At and prior to the dissolution and liquidation of Spenax Corporation defendant Robert J. Coulter received liquidating distributions in the amount of $1,147,266 and defendant E. Greene received liquidating distributions in the amount of $764,844.

34. To the extent of the assets of Spenax Corporation acquired by them, defendants Robert J. Coulter and David E. Greene are liable for the unsatisfied obligations of Spenax Corporation under the lease agreement with plaintiffs.

35. Defendants Robert J. Coulter and David E. Greene are justly indebted to plaintiffs for all unpaid rent, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

36. Defendants Robert J. Coulter and David E. Greene have failed and refused to pay to plaintiffs any of the foregoing amounts.

37. Proximately, directly, and solely as a result of violation of the obligations of defendants Robert J. Coulter and David E. Greene to pay plaintiffs the foregoing amounts, plaintiffs have been injured and damaged, by being deprived of the rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

FOURTH CAUSE OF ACTION TO RECOVER FOR FRAUDULENT CONVEYANCES

38. Plaintiffs reallege all of the allegations contained in paragraph 1 through 13, 15 through 18, and 33 hereof, as fully as if again set forth herein.

39. Defendants Robert J. Counter and David E. Greene conveyed money and assets to their respective wives, defendants Virginia Coulter and Sheila G. Greene, with a value of many hundreds of thousands of dollars each in 1988 and 1989.

40. The conveyances of the funds and property of Spenax Corporation to defendants Robert J. Coulter, David E. Greene, Staples, Staples, Inc., and Robert P. Kassing, were voluntary and without consideration, and Spenax Corporation did not retain property fully sufficient to pay its debts then existing, including the indebtedness to plaintiffs under the lease agreement.

41. The conveyances of the funds and property of defendants Robert J. Coulter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene were voluntary and without consideration, and defendants Robert J. Coulter and David E. Greene did not retain property fully sufficient to pay their debts then existing, including the indebtedness to plaintiffs by reason of the other causes of action set forth herein.

42. The conveyances of the funds and property of Spenax Corporation to defendants Robert J. Coulter, David E. Greene, Staples, Staples, Inc., and Robert P. Kassing, were voluntary and without consideration, and were made with the actual intent of Spenax Corporation to defraud creditors, including plaintiffs.

43. The conveyances of the funds and property of defendants Robert J. Counter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene were voluntary and without consideration, and were made with the actual intent of defendants Robert J. Coulter and David E. Greene to defraud creditors, including plaintiffs.

44. The conveyances of the funds and property of Spenax Corporation to defendants Robert J. Coulter, David E. Greene,

Staples, Staples, Inc., and Robert P. Kassing, even if for a valuable consideration, were made with the actual intent on the part of Spenax Corporation to defraud creditors, including plaintiffs, which intent was participated in by defendants Robert J. Coulter, David E. Greene, Staples, Staples, Inc., and Robert P. Kassing, or of which these defendants had notice.

45. The conveyances of the funds and property of defendants Robert J. Coulter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene, even if for a valuable consideration, were made with the actual intent on the part of defendants Robert J. Coulter and David E. Greene to defraud creditors, including plaintiffs, which intent was participated in by defendants Virginia Coulter and Sheila G. Greene, or of which these defendants had notice.

46. The conveyances of the funds and property of defendants Robert J. Coulter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene were made in trust for the use of the persons making the transfers.

47. The foregoing circumstances establish that the conveyance of the assets of Spenax Corporation to defendants Robert J. Coulter, David E. Greene, Staples, Staples, Inc., and Robert P. Kassing, and the conveyance of the assets of defendants Robert J. Coulter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene were fraudulent conveyances under the common law of the state of North Carolina and N.C.G.S. § 39-15.

48. The foregoing circumstances establish that the conveyance of the assets of Spenax Corporation to defendants Robert J. Coulter, David E. Greene, Staples, Staples, Inc., and Robert P. Kassing, and the conveyance of the assets of defendants Robert J. Coulter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene were fraudulent conveyances under the common law of the state of Indiana, and Indiana Code § 32-2-1-14 and 15.

49. Proximately, directly, and solely as a result of the fraudulent conveyances, plaintiffs have been injured and damaged, by being deprived of the rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

FIFTH CAUSE OF ACTION FOR INDIVIDUAL LIABILITY OF ALLEGED LIMITED PARTNERS

50. Plaintiffs reallege all of the allegations contained in paragraphs 1 through 13 and 15 through 18 hereof, as fully as if again set forth herein.

51. The purported refusal of Staples to assume any of the liabilities or obligations of Spenax Corporation under the lease agreement with plaintiffs, while accepting and receiving all of the benefits, rights, and advantages of that lease agreement, was ineffective; and by operation of law, Staples became liable for the liabilities and obligations of Spenax Corporation under the lease agreement with plaintiffs.

52. The liabilities and obligations of Staples under the lease agreement with plaintiffs became the personal liabilities and obligations of defendants Robert J. Coulter and David E. Greene, as

ostensible general partners, and manager and assistant manager, respectively, of Staples, and of defendant Robert P. Kassing, as the alter ego of the general partner Staples, Inc., in accordance with the provisions of the common laws of the state of North Carolina and of the state of Indiana, and in accordance with the provisions of N.C.G.S. § 59-303(a) and Indiana Code § 23-16-4-3(a)(2).

53. Defendants Robert J. Coulter and David E. Greene have failed and refused to pay plaintiffs rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

54. Proximately, directly, and solely because defendants Robert J. Coulter, David E. Greene, and Robert P. Kassing have breached their obligations to make the payments to plaintiffs to which they are entitled under the lease agreement, plaintiffs have been injured and damaged, by being deprived of the rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

SIXTH CAUSE OF ACTION FOR DECLARATORY JUDGMENT ON STATUTE OF LIMITATIONS

55. Plaintiffs reallege all of the allegations contained in paragraphs 1 through 13, 15 through 18, and 33 hereof, as fully as if again set forth herein.

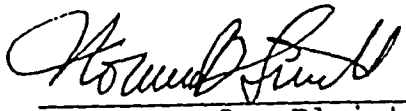
56. Plaintiffs anticipate that defendants may seek to rely on the provisions of Indiana Code § 23-1-45-7(c)(1), which appears to create a two-year statute of limitations, after which claims are

barred against distributees of corporations that have gone through dissolution and liquidation, when the only notice given by these corporations to known creditors is a legal advertisement in an obscure newspaper, of which the creditors did not receive actual notice.

57. The enforcement of the foregoing provision of the Indiana Code in the manner defendants are anticipated to construe it, would deprive plaintiffs of due process of law contrary to the Fourteenth Amendment to the United States Constitution, by confiscating their property rights without sufficient and adequate notice.

58. Plaintiffs are entitled to a declaratory judgment that Indiana Code § 23-1-45-7(c)(1) cannot constitutionally be interpreted to extinguish plaintiffs' rights against defendants.

WHEREFORE, plaintiffs pray that they have and recover of defendants, jointly and severally, their actual damages under the first, third, fourth, and fifth causes of action and their treble damages under the second cause of action; that the judgement bear such interest thereon as is provided by law; that the court enter a declaratory judgment as prayed for in the sixth cause of action; that all issues of fact by tried by jury; that the costs of this action be taxed against defendants, plaintiffs' reasonable attorneys' fees with respect to their second cause of action; and that plaintiffs have such other and further relief as to the court may seem just and proper.



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Osborn Hiner & Lisher
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8330 Woodfield Crossing Blvd.
Indianapolis, IN 46240

CERTIFICATE OF SERVICE

I, Donald G. Orzeske, attorney for plaintiffs in the above-entitled action, do hereby certify that I have served a copy of the foregoing, Motion to Substitute Amended Complaint for Original Complaint and to Join Additional Parties Defendant, on opposing counsel of record at the last known address known to me, by placing said document in an envelope with first-class postage affixed, and by depositing said envelope in the U.S. Post Office in Indianapolis, Indiana, this 13th day of January, 1993, said envelope being addressed as follows:

Mr. Terrill D. Albright
Baker and Daniels
300 N. Meridian Street, #2700
Indianapolis, IN 46204

Mr. Arthur P. Kalleres
Ice Miller Donadio and Ryan
One American Square
Box 82001
Indianapolis, Indiana 46282

Attorney for Plaintiffs
Donald G. Orzeske
Osborn Hiner & Lisher
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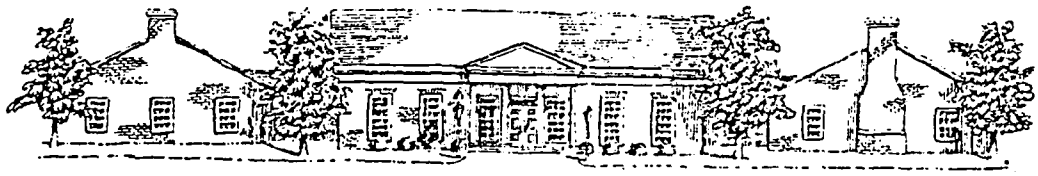
8330 Woodfield Crossing Blvd.
Indianapolis, IN 46240



TOWN OF JAMESTOWN

Settled in 1752 Chartered in 1816

Jamestown, North Carolina 27282

May 6, 1982

Mr. Ted Mew
N. C. Department of Natural
Resources & Community Development
P. O. Box 27687
Raleigh, North Carolina 27611

Dear Mr. Mew:

This letter is being written as agreed earlier this year concerning the cleaning up of waste that Power's Wire was discharging into our system.

As you know the Town stated that if the waste was not in compliance by May 1, 1982 the town would cut off water and sewer service to Powers Wire.

By working closely with the town, Powers Wire is cleaning up their waste by using two approaches. The first was the company sold their wire drawing process to an out of state company and is buying only pre-finished wire which solved most of their waste problems. The second approach of course was the elimination of their lagoon or settling basin.

The Town, working closely with them, has been allowing them to discharge approximately 20,000 gallons a day of neutralized liquid. Once most of the liquid has been drained off then Powers Wire will dispose of the sediments under the supervision of NRCD's Regional Office in Winston-Salem.

Also it has been agreed to by Powers Wire that after removing the sediments, they would neutralize the basins bed and fill in the basin.

The Town feels that the above conditions will help in eliminating the problems the town's waste treatment facilities have been having during past years and that the town's discharges into Deep River will be the cleanest it has been in many years.

Again I would like to thank you for all the help your office has given in helping Jamestown solve its waste problems. We are continually trying to improve our system.

We have just recently started buying jointly with the City of High Point of supplies in order to keep treatment cost down yet operate an efficient and cleaner system.

If you have any further questions please feel free to call.

Thank you,

TOWN OF JAMESTOWN

John J. Frezell
Town Manager

cc: Mayor and Town Council
Mr. Steve Mauney, Dept. of NRCD
Winston-Salem Regional Office

Phase II
Environmental Assessment Report
Former LP Staples Facility
Jamestown, North Carolina

Prepared for
Mr. Jack Lewis
Chambers, Price & Britt

June 17, 1993

Chris Boggs
Environmental Scientist

Augustus M. Mergenthaler, P.E.
Vice President, Operations

ENSCI Environmental, Inc.
1108 Old Thomasville Road
High Point, North Carolina 27260
(919) 883-7505

Table of Contents

Executive Summary

The Phase II Environmental Site Assessment of the former L.P. Staples facility consisted of advancing and sampling a total of 13 hand-augered soil borings, sampling the contents of an oil/water separator, and collecting a composite sample from ten 55-gallon drums. Soil boring areas were identified as environmental concerns in our Phase I Environmental Site Assessment report dated November 17, 1993. Oil/water separator and drum sampling was conducted in order to characterize the material for disposal purposes.

Soil samples collected from the borings were analyzed for total petroleum hydrocarbons, volatile organic compounds, and semivolatile organic compounds using EPA Methods 3550, 9071, 8240, and 8270. Results of soil sample analysis indicated 170 parts per million total petroleum hydrocarbons in the form of oil and grease at SB-2, methylene chloride detections at SB-5 and SB-13, and low levels of pyrene, chrysene, and benzo anthracene at SB-12.

The detected level of total petroleum hydrocarbons in the form of oil and grease at SB-2 is below the minimum action level established by the North Carolina Department of Environment, Health & Natural Resources (DEHNR). Methylene chloride is a common laboratory solvent, and in the opinion of AnalyitiKEM Laboratories (the analyzing laboratory), its presence in these samples is a result of laboratory contamination. The detection of pyrene, chrysene, and benzo anthracene suggests the presence of petroleum, potentially used cutting oil, at SB-12. To confirm the presence of potential petroleum and/or metals contamination at this location, an additional sample should be collected for analysis by EPA method 9071 and the TCLP for metals.

The unknown contents of the oil/water separator and 55-gallon drums were analyzed for TCLP metals and Priority Pollutants in order to characterize them for disposal. Results of the analyses indicated that the material is nonregulated; however, it contains some hazardous constituents which will require proper disposal at an approved disposal facility.

1. Introduction

ENSCI Environmental, Inc. was contracted by Mr. Jack Lewis of Chambers, Price & Britt to perform a Phase II Environmental Assessment at the former LP Staples facility on Ragsale Road in Jamestown, North Carolina (see Figure 1). The purpose of the Phase II investigation was to assess potential areas of soil contamination and to characterize the unknown contents of an oil/water separator and ten 55-gallon drums for disposal.

1.1 Site Description and History

The subject property is located at 105 Ragsdale Road, in Jamestown, North Carolina. The site is approximately 4.66 acres in size and is occupied by a one-story, 57,132-square foot brick building that was constructed in 1967 (see Figure 2). The building occupies approximately 40 percent of the property, with parking and surrounding grounds covering the other 60 percent of the site. The building is made up of four sections:

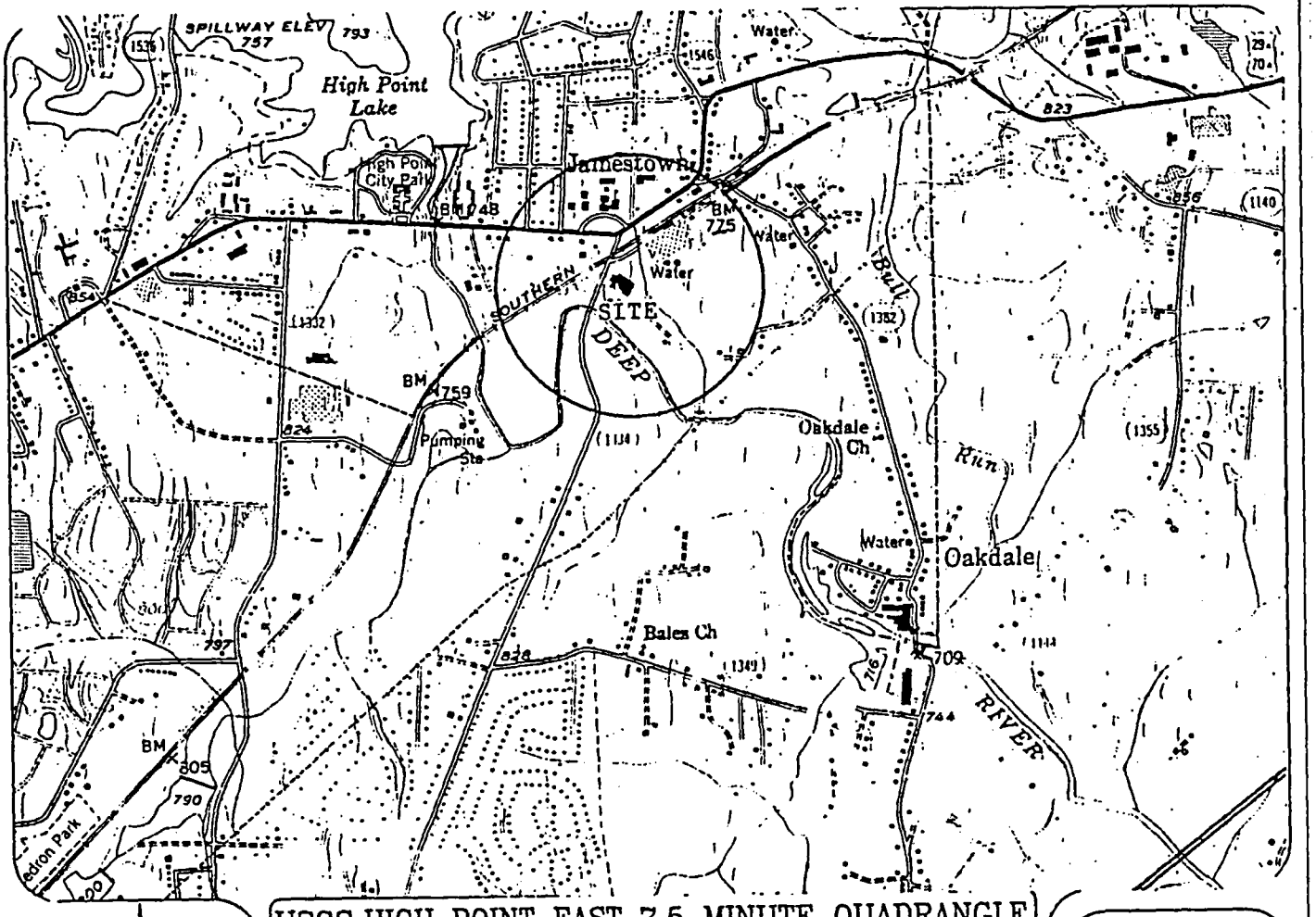
- On the west side of the building, a 90- by 42-foot area is occupied by offices.
- Adjacent to the office area is a 150- by 200-foot room which is connected to the loading dock. At the center of this room is a 2 story structure that contains offices, restrooms, and a tool room.
- On the northeast side of the building is a 100- by 50-foot room that appears to have previously contained heavy machinery. Along the southeast wall of this room is a 92- by 20-foot shed.
- On the southeast side of the building is a second 100- by 50-foot room that also appears to have contained heavy machinery. Two sheds are located east of this room, a 20- by 20-foot shed that appears to have contained a boiler, and a 10- by 30-foot shed that appears to have been the compressor area.

The former LP Staples facility is surrounded by a chain link fence. Along the fence at the southeast edge of the site is a 20- by 30-foot shed that appears to have been a chemical storage area. The site is bordered to the west by Ragsdale Road, to the northwest by the Highland Container Corporation and to the east and south by wooded areas.

The surface topography at the site slopes gradually to the southeast carrying surface runoff toward a ditch that is a tributary of the Deep River. Drainage of the general area

TOPOGRAPHICAL MAP

CHAMBERS, PRICE, & BRITT
Jamestown, North Carolina



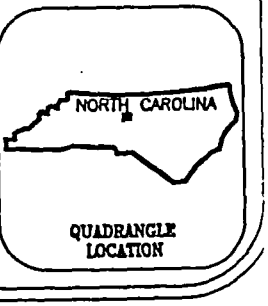
USGS HIGH POINT EAST 7.5 MINUTE QUADRANGLE

DATE OF MAP: 1950 PHOTOREVISION DATE: 1982

PHOTOREVISION DENOTED IN PURPLE (COLOR MAPS ONLY)

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SCALE 1:24000



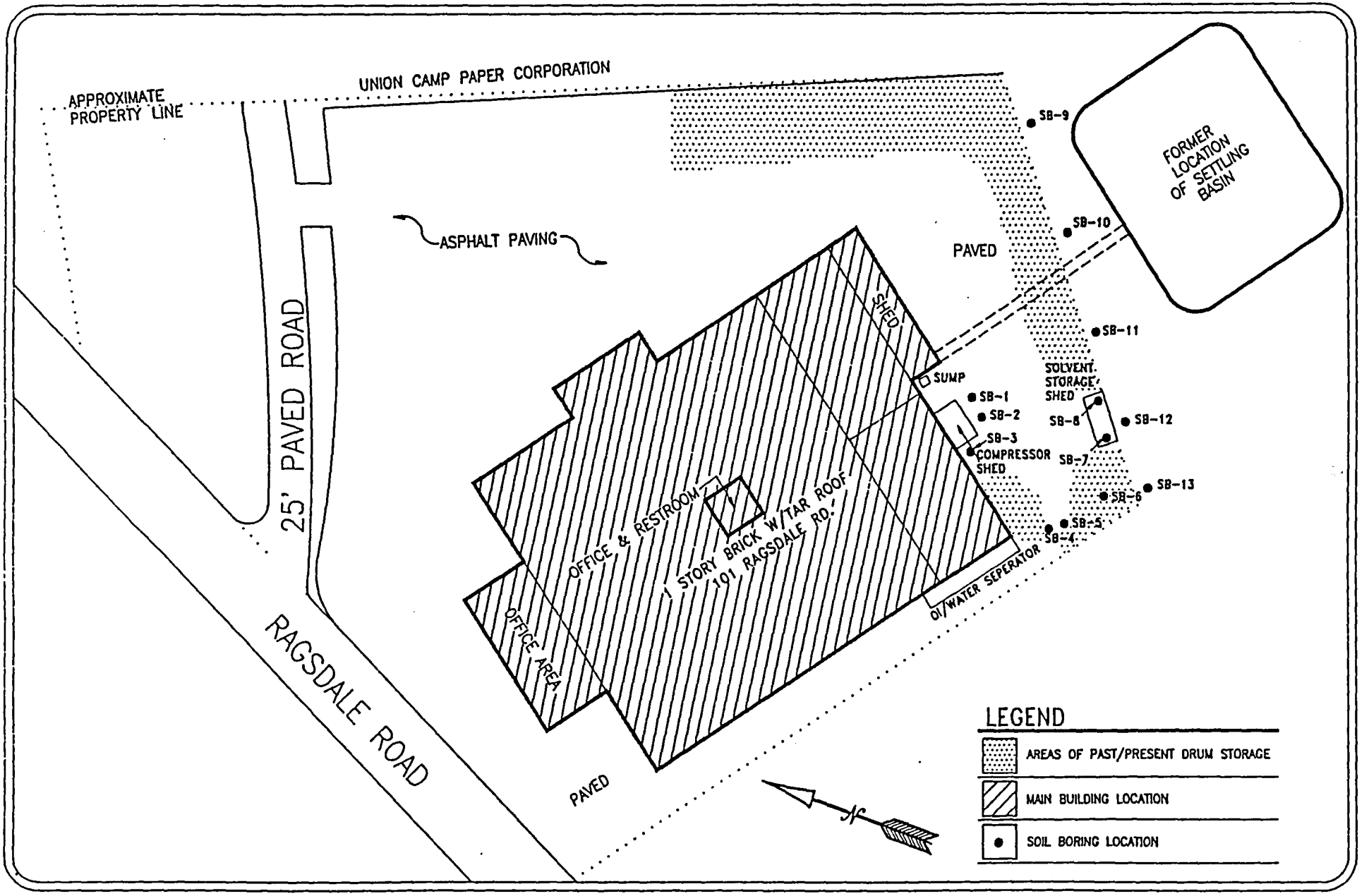
ROAD CLASSIFICATION

HEAVY-DUTY
MEDIUM-DUTY
LIGHT-DUTY
FOOT TRAIL
WGN & JEEP TRACK
UNIMPROVED ROAD

U.S. ROUTE
STATE ROUTE
INTERSTATE ROUTE

ENSCI® CORPORATION
HIGH POINT, NORTH CAROLINA

FOR: CHAMBERS, PRICE, & BRITT	CITY: JAMESTOWN
TITLE: TOPOGRAPHIC MAP	STATE: NORTH CAROLINA
SCALE: 1"=2000'	DWN BY: DJ
DWG NAME: USGS-1	FIGURE: 1
DATE: 11/18/92	CK BY: CB
JOB #: AC35-005	



ENVIRONMENTAL, INC.
HIGH POINT, N.C.

CLIENT: CHAMBERS, BRITT, & PRICE
PROPERTY NAME: L P STAPLES
CITY: JAMESTOWN
STATE: NORTH CAROLINA
TITLE: SOIL BORING LOCATION MAP

SCALE: 1"=80'
DATE: 5/3/93
DRAWING NAME: CBP-2

DRAWN BY: DJ
CHECK BY: CB
JOB NUMBER: AC35005
TYPE: PHASE II
FIGURE NUMBER: 2

0 20 40 60 80 120 160
GRAPHIC SCALE IN FEET

is assisted by the Deep River which is located approximately 200 feet south of the subject site.

Conversations with local officials, employees of Highland Container, and field observations made during the walk-through investigation of the site indicate that wire staples and fasteners were previously manufactured at the facility. Several unsuccessful attempts were made to contact the previous owners of the facility to gain more detailed information about the manufacturing operations and former uses of the facility. Presently, part of the building is being used by Highland Container to store cardboard boxes.

ENSCI performed a Phase I Environmental Site Assessment at the subject facility in November 1992. As discussed in the report dated November 17, 1992, results of the investigation indicated several areas of potential environmental concern associated with past site uses and existing structures at the site.

1.2 Scope of Work

In order to assess soil conditions in areas of environmental concern at the site and to characterize for disposal the contents of an oil/water separator and existing drums, ENSCI performed the following activities April 8-16, 1993.

- Installation of 13 hand-augered soil borings, and collection and laboratory analysis of soil samples from each boring.
- Collection of samples of the contents of the oil/water separator for disposal characterization.
- Collection of a composite sample from 10 of the 55-gallon drums for disposal characterization.

Visual observations made by ENSCI during the site work, indicated that the existing 8-foot by 8-foot by 4-foot sump located near the compressor shed contains a type of coolant. Per the clients request, the sump was not sampled during this phase of the project. However, this material will have to be sampled for characterization necessary for proper disposal.

2. Geology, Hydrogeology and Soil Analysis

2.1 Regional Geology and Hydrogeology

The subject site is located in the Carolina Slate Belt hydrogeologic province in an area underlain by rocks identified on the 1985 Geologic Map of North Carolina as CZg-Metamorphosed Granitic Rock. This unit is described in the Preliminary Explanatory Text for the map as massive to well-foliated, medium- to coarse-grained, equigranular to porphyritic quartz monzonite and granodiorite containing lesser amounts of granite, tonalite, and quartz diorite. No structural features were noted on the Geologic Map in the immediate vicinity of the subject site.

Soils in this region are typically composed of residual weathering products of the underlying parent rocks. Groundwater in this region occurs as a shallow, unconfined aquifer within this residual material and fractures in the underlying bedrock. Groundwater flow direction is generally perpendicular to features of surface topography.

2.2 Soil Boring Installation and Soil Analysis

A total of 13 hand-augered soil borings (see Figure 2) were installed at the site during this phase of the investigation. The borings were advanced using 3.25-inch stainless steel hand-held soil augers. During installation of all borings, soil samples were collected at a depth of 3 feet for analysis.

When sampling equipment was reused, ENSCI personnel used the following procedure in order to prevent cross-contamination:

1. Wash with nonphosphate detergent and water, brush to remove particulate matter.
2. Rinse with tap water.
3. Rinse with 10 percent nitric acid solution.
4. Rinse with deionized water.
5. Rinse with pesticide-grade isopropyl alcohol.
6. Rinse with deionized water.
7. Air dry as long as possible.

As an additional measure in preventing cross-contamination, latex gloves were worn by the sampling technician during these activities. Gloves were changed between samples.

Each sample collected at the site was placed in a laboratory-prepared glass jar, packed in ice, and maintained at 4°C during shipment to AnalytiKEM in Rock Hill, South

Carolina for analysis for the targeted compounds. The specific methods and results of the analyses are discussed in the following sections. Copies of the chain of custody forms and laboratory report are included in Appendix A.

2.2.1 Compressor Pad Area

As illustrated in Figure 2, two soil borings were installed adjacent to the compressor pad (SB-1 and SB-2). One soil sample was collected from each location at a depth of 3 feet and analyzed for total petroleum hydrocarbons using EPA Method 3550 and for total petroleum hydrocarbons in the form of oil and grease using EPA Method 9071. Table 1 illustrates the results of soil analysis. A copy of the original laboratory report is included in Appendix A.

Table 1: Results of Soil Analysis
Compressor Pad Area
Total Petroleum Hydrocarbons in Parts Per Million

Sample #	Method 3550	Method 9071
SB-1	<10*	<10*
SB-2	<10*	170
Action Level**	40	250

* Not detected at the practical quantitation limit of 10 parts per million for the analysis.

** The North Carolina Department of Environment, Health & Natural Resources (DEHNR) minimum level requiring cleanup action as specified in published guidelines.

As indicated in Table 1, total petroleum hydrocarbons in the form of oil and grease (EPA Method 9071) were detected in sample SB-2 at a concentration of 170 parts per million. The detected concentration does not exceed the DEHNR action level of 250 parts per million for this method.

2.2.2 Former Drum Storage Areas

Four soil borings (SB-3, SB-4, SB-5, and SB-6) were installed in areas previously used to store drums behind the building (Figure 2). SB-3 was installed along the southeast side of the building, SB-4 and SB-5 were installed adjacent to signs on the fence that read "acetone" and "used naptha", and SB-6 was installed in the southeast corner of the parking lot in another former drum storage area. One soil sample was collected from

each location at a depth of 3 feet and analyzed for volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs) using EPA Methods 8240 and 8270. (Note that samples were obtained from soil borings SB-3 and SB-5 on April 8, 1993 for volatile analysis and June 7, 1993 for semivolatile analysis). Methylene chloride was the only detected parameter. A summary of methylene chloride results is presented in Table 2. A copy of the original laboratory report is included in Appendix A.

Table 2: Results of Soil Analysis
Former Drum Storage Areas
Volatile and Semi-Volatile Organic Compounds in Parts Per Billion

Sample	Methylene Chloride Results
SB-3	<500*
SB-4	<500*
SB-5	510
SB-6	<500*

* Compound not detected at the analytical detection limit of 500 parts per billion.

As indicated in Table 2, methylene chloride was detected in soil sample SB-5 at a concentration of 510 parts per billion. It is the opinion of AnalytiKEM Laboratories that methylene chloride was detected as a result of laboratory contamination (see letter, Appendix B). No semivolatile organic compounds were detected in these samples using EPA Method 8270.

2.2.3 Former Solvent Storage Shed

Two soil borings (SB-7 and SB-8) were installed in the area of the former solvent storage shed on the south border of the site (see Figure 2). One soil sample was collected from each location at a depth of 3 feet and analyzed for volatile organic compounds and semivolatile organic compounds using EPA Methods 8240 and 8270.

Results of the analysis indicated no detectable concentrations of volatile or semivolatile organic compounds using EPA Methods 8240 and 8270. A copy of the original laboratory report is included in Appendix A.

2.2.4 Southeast Border of Property

Five soil borings (SB-9, SB-10, SB-11, SB-12 and SB-13) were installed at equal intervals along the edge of the asphalt on the southeast border of the site (see Figure 2). One soil sample was collected from each location at a depth of 3 feet and analyzed for volatile organic compounds and semi-volatile organic compounds using EPA Methods 8240 and 8270. Results are illustrated in Table 3. A copy of the original laboratory report is included in Appendix A.

Table 3: Results of Soil Analysis
Southeast Border of Property
Volatile and Semivolatile Organic Compounds in Parts Per Billion

Parameter	SB-9	SB-10	SB-11	SB-12	SB-13
Methylene Chloride	<500*	<500*	<500*	<500*	510
Pyrene	<300*	<300*	<300*	1400	<300*
Chrysene	<300*	<300*	<300*	560	<300*
Benzo Anthracene	<300*	<300*	<300*	450	<300*

* Not detected at the practical quantitation limit for the analysis.

As indicated in Table 3, methylene chloride was detected in sample SB-13 at a concentration of 510 parts per billion. It is the opinion of AnalytiKEM Laboratories that methylene chloride was detected as a result of laboratory contamination (see letter, Appendix B).

3. Oil/Water Separator

The unknown contents of an existing 10,000-gallon oil/water separator was sampled to determine the disposal characterization. The 10,000-gallon oil/water separator was noted as approximately two-thirds (6,600 gallons) full at the time of sampling. Two-thirds of the material present (4,400 gallons) is liquid while the other one-third (2,200 gallons) is sludge. The liquid and sludge were sampled and analyzed for Priority Pollutants using EPA Methods 624, 625, 3510, 8080, 9012, 413.1 and 9066. A summary of analytical

results is presented in Table 4, located on the following page. A copy of the original laboratory report is included in Appendix A.

Note that the original analysis for volatile and semivolatile organic compounds of this sample was conducted using inordinately high detection limits. A second sample was obtained and re-analyzed at a lower detection limit. Results of the second sampling event are presented in the table.

Results of analyses indicated that the material is nonregulated; however, it contains some hazardous constituents which will require proper disposal at an approved disposal facility.

4. 55-Gallon Drums

A total of 30 drums were noted at the site during the field work. Most (20) of the drums contained trash or miscellaneous discarded material while the others (10) contained unknown liquids. A composite sample was collected from the 10 drums containing unknown liquids for analysis for Priority Pollutants using the same methodology as above. A summary of analytical results for this sample is presented in Table 4. Note that the containers for the analytical methods for pesticides and PCBs were broken during transport. An additional composite sample was obtained and re-analyzed for all parameters. A copy of the original laboratory report is included in Appendix A.

Results of analyses indicated that the material is nonregulated; however, it contains some hazardous constituents which will require proper disposal at an approved disposal facility.

5. Conclusions and Recommendations

5.1 Soil

Analysis by EPA Method 9071 of the soil sample collected from soil boring SB-2 indicates the presence of total petroleum hydrocarbons in the form of oil and grease at a concentration of 170 parts per million. This is below the DEHNR action level for this method of 250 parts per million.

Detection of pyrene, chrysene, and benzo anthracene in the sample collected from soil boring SB-12 suggest the presence of low levels of petroleum in the soil at this location. A potential source of petroleum contamination may have been cutting oil used in machining operations. In order to determine the potential impact to the area, an

Table 4: Priority Pollutant Analysis
Oil/Water Separator and 55-Gallon Drum Contents

Semivolatile and Volatile Organic Compounds				
Parameter	Sample Identification			
	O/W Separator (OW)	O/W Separator-2nd Event (OWR)	Drums (D)	Drums-2nd Event (DL)
Methylene Chloride	530	ND	59	46
Acetone	< 10,600	ND	9400	2900
Toluene	< 530	31	290	90
Xylenes	ND	90	ND	ND
Dibutyl Pthalate	1500	ND	ND	ND
Bis (2- Ethylhexyl) Pthalate	240	ND	ND	360
Butyl Benzyl Pthalate	ND	ND	350	510
Total Metals				
Parameter	Sample Identification			
	O/W Separator (OW)	O/W Separator-2nd Event (OWR)	Drums (D)	Drums-2nd Event (DL)
Arsenic	41	-	18	14
Chromium	92	-	64	ND
Copper	1200	-	1000	590
Lead	97	-	210	87
Nickel	41	-	100	78
Zinc	3900	-	1300	9600
Cadmium	< 10	-	11	ND
General Chemistry				
Parameter	Sample Identification			
	O/W Separator (OW)	O/W Separator-2nd Event (OWR)	Drums (D)	Drums-2nd Event (DL)
Phenolics	590	-	720	270

ND Parameter not detected
- Analysis not conducted

additional sample should be collected from this location for analysis using EPA Method 9071 and the Toxic Characteristic Leachate Procedure (TCLP) for metals.

Analytical results for samples collected from the remaining soil borings do not indicate the presence of any volatile or semi-volatile organic compounds in excess of currently published DEHNR standards.

5.2 Oil/Water Separator

Analysis of the sample of the contents of the oil/water separator indicates the presence of organic compounds and metals that could be considered hazardous if present in high concentrations. Due to the low detected concentrations of these constituents, the material can be characterized for disposal as nonregulated material. Due to the potentially hazardous constituents, however, the contents of the oil/water separator will need to be disposed of at an approved facility.

5.3 55-Gallon Drums

Analysis of the composite sample obtained from the ten 55-gallon drums indicates the presence of organic compounds and metals that could be considered hazardous if present in high concentrations. Due to the low concentrations of these constituents in the sampled drums, the material can be characterized for disposal as nonregulated material. Due to the potentially hazardous constituents, however, the contents of the drums will need to be disposed of at an approved facility.

6. References

Geologic Map of North Carolina, 1985
Scale 1:500,000

North Carolina Geologic Survey
Preliminary Explanatory Text for the 1985 Geologic Map of North Carolina
Contractual Report 88-1 (in draft) p. 62
North Carolina Geologic Survey

Appendix A

Chain of Custody and Laboratory Reports

AnalytiKEM An American NuKEM Company

AnalytiKEM Inc.
454 S. Anderson Road, BTC 532
Rock Hill, SC 29730
803/329-9690
Fax: 803/324-3982

TEST REPORT NO. A83432

April 30, 1993

Prepared for:

ENSCI
1108 Thomasville Road
High Point, NC 27260

Attention: Chris Boggs

Project: LP Staples

Reviewed &
Approved by: _____

Name: Carmine M. Fioriglio

Title: QA/QC Manager

AnalytiKEM

TABLE OF CONTENTS

AnalytiKEM

I. Certification

AnalytiKEM, Inc.
Current Certifications/Regulatory Approvals

Tabulated below are the current laboratory certifications that are held by each AnalytiKEM Laboratory.

Cherry Hill, NJ		Rock Hill, SC		Houston Analytical, TX	
State	Cert #	State	Cert #	State	Cert #
Arkansas	*	S. Carolina	46067	N. Dakota	R-006
Connecticut	PH-0715	N. Carolina	316	Oklahoma	8403
Florida	880985G	New Jersey	79795	Texas Water Commission	*
Massachusetts	NJ117			Louisiana	92-07
New Jersey	04012			S. Carolina	82011
New York	10815			N. Carolina	367
N. Carolina	258			Wisconsin	998010530
N. Dakota	R-038			New Jersey	82869
Pennsylvania	68366			West Virginia	*
S. Carolina	94004			Alaska UST	AKL008
Tennessee	02908				
Vermont	*				
Oklahoma	9107				

* No certification numbers are issued for these states.

AnalytiKE

II. Definition of Terms

Term	Definition
D	Detected; result must be greater than zero.
DI	Deionized Water
J	Compound was detected at levels below the practical quantitation limit. The level reported is approximate.
MS/MSD	Matrix Spike/Matrix Spike Duplicate.
NA	Analysis not applicable to the sample matrix.
ND	Not Detected
NR	Not Requested
NTU	Nephelometric Turbidity Units
RPD	Relative Percent Difference
RSD	Relative Standard Deviation
U	Compound was analyzed for but not detected. The preceding numb is the practical quantitation limit for the compound.
ppb	Parts-per-billion; may be converted to ppm by dividing by 1,000.
ppm	Parts-per-million; may be converted to ppb by multiplying by 1,000.
ug/l	Micrograms of constituent per liter of sample; equivalent to parts-per-billion.
ug/kg	Micrograms of constituent per kilogram of sample; equivalent to parts-per-billion.
ug/kg dw	Micrograms of constituent per kilogram of sample reported on a dry weight basis.
CCC	Calibration Check Compound; used to verify the precision of a GC/MS calibration curve.
SPCC	System Performance Check Compound; used to verify the correct operation of a GC/MS instrument.
PQL	Practical Quantitation Limit; the minimum level at which compounds can be dependably quantitated.
B	Analyte detected in associated blank as well as the sample. It indicates possible/probable blank contamination.

III. Sample Designations

AnalytiKEM

AnalytiKEM Designation	Client Designation	Matrix	Date Sampled
A83432-1	OW	Aqueous	4/02/93
A83432-2	SB-1	Nonaqueous	4/02/93
A83432-3	SB-2	Nonaqueous	4/02/93
A83432-4	SB-3	Nonaqueous	4/02 & 4/08/9
A83432-5	SB-4	Nonaqueous	4/02 & 4/08/9
A83432-6	SB-5	Nonaqueous	4/02/93
A83432-7	SB-6	Nonaqueous	4/02/93
A83432-8	SB-7	Nonaqueous	4/02/93
A83432-9	SB-8	Nonaqueous	4/02/93
A83432-10	SB-9	Nonaqueous	4/02/93
A83432-11	SB-10	Nonaqueous	4/02/93
A83432-12	SB-11	Nonaqueous	4/02/93
A83432-13	SB-12	Nonaqueous	4/02/93
A83432-14	SB-13	Nonaqueous	4/02/93
A83432-15	D	Aqueous	4/02/93
A83432-16	DL	Aqueous	4/16/93

Note: Samples will be held for 30 days beyond the test report date unless otherwise requested.

IV. Methodology

Volatiles

Method 5030, Purge and Trap, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Method 8240, Gas Chromatography/Mass Spectrometry for Volatile Organics, T Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, Thir Edition, USEPA, 1986, with all promulgated revisions.

Semivolatiles

Method 3510, Separatory Funnel Liquid-Liquid Extraction, Test Methods for Evaluating Solid Waste, Physical Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Method 3550, Sonication Extraction, Test Methods for Evaluating Solid Wast Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Method 8270, Gas Chromatography/Mass Spectrometry for Semivolatile Organic Capillary Column Technique, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

IV. Methodology (Cont'd)

Organochlorine Pesticides and Polychlorinated Biphenyls

Method 3510, Separatory Funnel Liquid-Liquid Extraction, Test Methods for Evaluating Solid Waste, Physical Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Method 8080, Organochlorine Pesticides and PCBs, Test Methods for Evaluatin; Solid Waste Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

General Chromatography

Petroleum Hydrocarbons

Method 3550, Sonication Extraction, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Petroleum Hydrocarbons were analyzed by Gas Chromatography using flame ionization detection on a 6ft. x 2mm ID glass column packed with 10% SP2100 on 100/120 mesh Supelcoport programmed from 65°C to 225°C.

IV. Methodology (Cont'd)

AnalytiKE

Metals

Method 3010, Acid Digestion of Aqueous Samples and Extracts for Total Metal for Analysis by Flame Atomic Absorption Spectroscopy or Inductively Coupled Plasma Spectroscopy, Test Methods for Evaluating Solid Waste. Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Method 3020, Acid Digestion of Aqueous Samples and Extracts for Total Metal for Analysis by Furnace Atomic Absorption Spectroscopy, Test Methods for Evaluating Solid Waste. Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Method 6010, Inductively Coupled Plasma Atomic Emission Spectroscopy, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Method 7000, Atomic Absorption Methods, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with a promulgated revisions.

- Method 7060, Arsenic, AA, Furnace
- Method 7060, Arsenic, AA, Furnace
- Method 7421, Lead, AA, Furnace
- Method 7470, Mercury in Liquid Waste (Manual Cold-Vapor Technique)
- Method 7740, Selenium, AA, Furnace
- Method 7841, Thallium, AA, Furnace

General Chemistry

Method 9012, Total and Amenable Cyanide (Colorimetric, Automated UV) Integrity Test, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Method 413.1, Total Recoverable Oil and Grease (Gravimetric, Separatory Funnel Extraction), Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, USEPA, 1979.

Method 9066, Phenolics (Colorimetric, Automated 4-AAP with Distillation), Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

V. Analytical Results

AnalytiKE

Volatile Organics

Parameter	Sample Designation: Method Blank 1	A83432-1 OW
Chloromethane	< 1,000	< 1,060
Bromomethane	< 1,000	< 1,060
Vinyl Chloride	< 1,000	< 1,060
Chloroethane	< 1,000	< 1,060
Methylene Chloride	< 500	530
2-Propanone (Acetone)	< 10,000	< 10,600
1,1-Dichloroethene	< 500	< 530
1,1-Dichloroethane	< 500	< 530
trans-1,2-Dichloroethene	< 500	< 530
Chloroform	< 500	< 530
1,2-Dichloroethane	< 500	< 530
1,1,1-Trichloroethane	< 500	< 530
Carbon Tetrachloride	< 500	< 530
Bromodichloromethane	< 500	< 530
1,2-Dichloropropane	< 500	< 530
trans-1,3-Dichloropropene	< 500	< 530
Trichloroethene	< 500	< 530
Dibromochloromethane	< 500	< 530
1,1,2-Trichloroethane	< 500	< 530
Benzene	< 500	< 530
cis-1,3-Dichloropropene	< 500	< 530
2-Chloroethyl Vinyl Ether	< 1,000	< 1,060
Bromoform	< 500	< 530
Tetrachloroethene	< 500	< 530
1,1,2,2-Tetrachloroethane	< 500	< 530
Toluene	< 500	< 530
Chlorobenzene	< 500	< 530
Ethylbenzene	< 500	< 530
m-Xylene	< 500	< 530
o,p-Xylene	< 500	< 530
Units	(ug/kg)	(ug/l)

V. Analytical Results (Cont'd)

AnalytiKE

Volatile Organics

Parameter	Method Blank 2	A83432-4 SB-3	A83432-6 SB-5
		Sample Designation	
Chloromethane	< 1,000	< 1,000	< 1,000
Bromomethane	< 1,000	< 1,000	< 1,000
Vinyl Chloride	< 1,000	< 1,000	< 1,000
Chloroethane	< 1,000	< 1,000	< 1,000
Methylene Chloride	< 500	< 500	510
2-Propanone (Acetone)	< 10,000	< 10,000	< 10,000
1,1-Dichloroethene	< 500	< 500	< 500
1,1-Dichloroethane	< 500	< 500	< 500
trans-1,2-Dichloroethene	< 500	< 500	< 500
Chloroform	< 500	< 500	< 500
1,2-Dichloroethane	< 500	< 500	< 500
1,1,1-Trichloroethane	< 500	< 500	< 500
Carbon Tetrachloride	< 500	< 500	< 500
Bromodichloromethane	< 500	< 500	< 500
1,2-Dichloropropane	< 500	< 500	< 500
trans-1,3-Dichloropropene	< 500	< 500	< 500
Trichloroethene	< 500	< 500	< 500
Dibromochloromethane	< 500	< 500	< 500
1,1,2-Trichloroethane	< 500	< 500	< 500
Benzene	< 500	< 500	< 500
cis-1,3-Dichloropropene	< 500	< 500	< 500
2-Chloroethyl Vinyl Ether	< 1,000	< 1,000	< 1,000
Bromoform	< 500	< 500	< 500
Tetrachloroethene	< 500	< 500	< 500
1,1,2,2-Tetrachloroethane	< 500	< 500	< 500
Toluene	< 500	< 500	< 500
Chlorobenzene	< 500	< 500	< 500
Ethylbenzene	< 500	< 500	< 500
m-Xylene	< 500	< 500	< 500
o,p-Xylene	< 500	< 500	< 500
m-Dichlorobenzene *	< 500	< 500	< 500
o,p-Dichlorobenzene *	< 500	< 500	< 500
Units	(ug/kg)	(ug/kg)	(ug/kg)

* Semivolatile analysis was not requested for these samples, therefore Dichlorobenzenes are reported in the Volatile analysis.

V. Analytical Results (Cont'd)

Analytik

Volatile Organics

Parameter	Sample Designation: Method Blank 3	A83432-16 DL
Chloromethane	< 10	< 66
Bromomethane	< 10	< 66
Vinyl Chloride	< 10	< 66
Chloroethane	< 10	< 66
Methylene Chloride	6.8	46
2-Propanone (Acetone)	< 100	2,900
1,1-Dichloroethene	< 5.0	< 33
1,1-Dichloroethane	< 5.0	< 33
trans-1,2-Dichloroethene	< 5.0	< 33
Chloroform	< 5.0	< 33
1,2-Dichloroethane	< 5.0	< 33
1,1,1-Trichloroethane	< 5.0	< 33
Carbon Tetrachloride	< 5.0	< 33
Bromodichloromethane	< 5.0	< 33
1,2-Dichloropropane	< 5.0	< 33
trans-1,3-Dichloropropene	< 5.0	< 33
Trichloroethene	< 5.0	< 33
Dibromochloromethane	< 5.0	< 33
1,1,2-Trichloroethane	< 5.0	< 33
Benzene	< 5.0	< 33
cis-1,3-Dichloropropene	< 5.0	< 33
2-Chloroethyl Vinyl Ether	< 10	< 66
Bromoform	< 5.0	< 33
Tetrachloroethene	< 5.0	< 33
1,1,2,2-Tetrachloroethane	< 5.0	< 33
Toluene	< 5.0	90
Chlorobenzene	< 5.0	< 33
Ethylbenzene	< 5.0	< 33
m-Xylene	< 5.0	< 33
o,p-Xylene	< 5.0	< 33
Units	(ug/l)	(ug/l)

V. Analytical Results (Cont'd)

AnalytiKE

Volatile Organics

Parameter	Method Blank 4	A83432-5 SB-4	A83432-7 SB-6
	Sample Designation		
Chloromethane	< 1,000	< 1,000	< 1,000
Bromomethane	< 1,000	< 1,000	< 1,000
Vinyl Chloride	< 1,000	< 1,000	< 1,000
Chloroethane	< 1,000	< 1,000	< 1,000
Methylene Chloride	< 500	< 500	< 500
2-Propanone (Acetone)	< 10,000	< 10,000	< 10,000
1,1-Dichloroethene	< 500	< 500	< 500
1,1-Dichloroethane	< 500	< 500	< 500
trans-1,2-Dichloroethene	< 500	< 500	< 500
Chloroform	< 500	< 500	< 500
1,2-Dichloroethane	< 500	< 500	< 500
1,1,1-Trichloroethane	< 500	< 500	< 500
Carbon Tetrachloride	< 500	< 500	< 500
Bromodichloromethane	< 500	< 500	< 500
1,2-Dichloropropane	< 500	< 500	< 500
trans-1,3-Dichloropropene	< 500	< 500	< 500
Trichloroethene	< 500	< 500	< 500
Dibromochloromethane	< 500	< 500	< 500
1,1,2-Trichloroethane	< 500	< 500	< 500
Benzene	< 500	< 500	< 500
cis-1,3-Dichloropropene	< 500	< 500	< 500
2-Chloroethyl Vinyl Ether	< 1,000	< 1,000	< 1,000
Bromoform	< 500	< 500	< 500
Tetrachloroethene	< 500	< 500	< 500
1,1,2,2-Tetrachloroethane	< 500	< 500	< 500
Toluene	< 500	< 500	< 500
Chlorobenzene	< 500	< 500	< 500
Ethylbenzene	< 500	< 500	< 500
m-Xylene	< 500	< 500	< 500
o,p-Xylene	< 500	< 500	< 500
Units	(ug/kg)	(ug/kg)	(ug/kg)

V. Analytical Results (Cont'd)

AnalytiKE

Volatile Organics

Parameter	Method Blank 4	A83432-8 SB-7	A83432-9 SB-8
	Sample Designation		
Chloromethane	< 1,000	< 1,000	< 1,000
Bromomethane	< 1,000	< 1,000	< 1,000
Vinyl Chloride	< 1,000	< 1,000	< 1,000
Chloroethane	< 1,000	< 1,000	< 1,000
Methylene Chloride	< 500	< 500	< 500
2-Propanone (Acetone)	< 10,000	< 10,000	< 10,000
1,1-Dichloroethene	< 500	< 500	< 500
1,1-Dichloroethane	< 500	< 500	< 500
trans-1,2-Dichloroethene	< 500	< 500	< 500
Chloroform	< 500	< 500	< 500
1,2-Dichloroethane	< 500	< 500	< 500
1,1,1-Trichloroethane	< 500	< 500	< 500
Carbon Tetrachloride	< 500	< 500	< 500
Bromodichloromethane	< 500	< 500	< 500
1,2-Dichloropropane	< 500	< 500	< 500
trans-1,3-Dichloropropene	< 500	< 500	< 500
Trichloroethene	< 500	< 500	< 500
Dibromochloromethane	< 500	< 500	< 500
1,1,2-Trichloroethane	< 500	< 500	< 500
Benzene	< 500	< 500	< 500
cis-1,3-Dichloropropene	< 500	< 500	< 500
2-Chloroethyl Vinyl Ether	< 1,000	< 1,000	< 1,000
Bromoform	< 500	< 500	< 500
Tetrachloroethene	< 500	< 500	< 500
1,1,2,2-Tetrachloroethane	< 500	< 500	< 500
Toluene	< 500	< 500	< 500
Chlorobenzene	< 500	< 500	< 500
Ethylbenzene	< 500	< 500	< 500
m-Xylene	< 500	< 500	< 500
o,p-Xylene	< 500	< 500	< 500
Units	(ug/kg)	(ug/kg)	(ug/kg)

V. Analytical Results (Cont'd)

AnalytiKE

Volatile Organics

Parameter	Method Blank 4	Sample Designation A83432-10 SB-9	A83432-11 SB-10
Chloromethane	< 1,000	< 1,000	< 1,000
Bromomethane	< 1,000	< 1,000	< 1,000
Vinyl Chloride	< 1,000	< 1,000	< 1,000
Chloroethane	< 1,000	< 1,000	< 1,000
Methylene Chloride	< 500	< 500	< 500
2-Propanone (Acetone)	< 10,000	< 10,000	< 10,000
1,1-Dichloroethene	< 500	< 500	< 500
1,1-Dichloroethane	< 500	< 500	< 500
trans-1,2-Dichloroethene	< 500	< 500	< 500
Chloroform	< 500	< 500	< 500
1,2-Dichloroethane	< 500	< 500	< 500
1,1,1-Trichloroethane	< 500	< 500	< 500
Carbon Tetrachloride	< 500	< 500	< 500
Bromodichloromethane	< 500	< 500	< 500
1,2-Dichloropropane	< 500	< 500	< 500
trans-1,3-Dichloropropene	< 500	< 500	< 500
Trichloroethene	< 500	< 500	< 500
Dibromochloromethane	< 500	< 500	< 500
1,1,2-Trichloroethane	< 500	< 500	< 500
Benzene	< 500	< 500	< 500
cis-1,3-Dichloropropene	< 500	< 500	< 500
2-Chloroethyl Vinyl Ether	< 1,000	< 1,000	< 1,000
Bromoform	< 500	< 500	< 500
Tetrachloroethene	< 500	< 500	< 500
1,1,2,2-Tetrachloroethane	< 500	< 500	< 500
Toluene	< 500	< 500	< 500
Chlorobenzene	< 500	< 500	< 500
Ethylbenzene	< 500	< 500	< 500
m-Xylene	< 500	< 500	< 500
o,p-Xylene	< 500	< 500	< 500
Units	(ug/kg)	(ug/kg)	(ug/kg)

V. Analytical Results (Cont'd)

Volatile Organics

Analyt

Parameter	Method Blank 5	Sample Designation A83432-12 SB-11	A83432-13 SB-12
Chloromethane	< 10	< 1,000	< 1,000
Bromomethane	< 10	< 1,000	< 1,000
Vinyl Chloride	< 10	< 1,000	< 1,000
Chloroethane	< 10	< 1,000	< 1,000
Methylene Chloride	5.8	< 500	< 500
2-Propanone (Acetone)	< 100	< 10,000	< 10,000
1,1-Dichloroethene	< 5.0	< 500	< 500
1,1-Dichloroethane	< 5.0	< 500	< 500
trans-1,2-Dichloroethene	< 5.0	< 500	< 500
Chloroform	< 5.0	< 500	< 500
1,2-Dichloroethane	< 5.0	< 500	< 500
1,1,1-Trichloroethane	< 5.0	< 500	< 500
Carbon Tetrachloride	< 5.0	< 500	< 500
Bromodichloromethane	< 5.0	< 500	< 500
1,2-Dichloropropane	< 5.0	< 500	< 500
trans-1,3-Dichloropropene	< 5.0	< 500	< 500
Trichloroethene	< 5.0	< 500	< 500
Dibromochloromethane	< 5.0	< 500	< 500
1,1,2-Trichloroethane	< 5.0	< 500	< 500
Benzene	< 5.0	< 500	< 500
cis-1,3-Dichloropropene	< 5.0	< 500	< 500
2-Chloroethyl Vinyl Ether	< 10	< 1,000	< 1,000
Bromoform	< 5.0	< 500	< 500
Tetrachloroethene	< 5.0	< 500	< 500
1,1,2,2-Tetrachloroethane	< 5.0	< 500	< 500
Toluene	< 5.0	< 500	< 500
Chlorobenzene	< 5.0	< 500	< 500
Ethylbenzene	< 5.0	< 500	< 500
m-Xylene	< 5.0	< 500	< 500
o,p-Xylene	< 5.0	< 500	< 500
Units	(ug/l)	(ug/kg)	(ug/kg)

Analytik

V. Analytical Results (Cont'd)

Volatile Organics

Parameter	Sample Designation: Method Blank 5	A83432-14 SB-13
Chloromethane	< 10	< 1,000
Bromomethane	< 10	< 1,000
Vinyl Chloride	< 10	< 1,000
Chloroethane	< 10	< 1,000
Methylene Chloride	5.8	510
2-Propanone (Acetone)	< 100	< 10,000
1,1-Dichloroethene	< 5.0	< 500
1,1-Dichloroethane	< 5.0	< 500
trans-1,2-Dichloroethene	< 5.0	< 500
Chloroform	< 5.0	< 500
1,2-Dichloroethane	< 5.0	< 500
1,1,1-Trichloroethane	< 5.0	< 500
Carbon Tetrachloride	< 5.0	< 500
Bromodichloromethane	< 5.0	< 500
1,2-Dichloropropane	< 5.0	< 500
trans-1,3-Dichloropropene	< 5.0	< 500
Trichloroethene	< 5.0	< 500
Dibromochloromethane	< 5.0	< 500
1,1,2-Trichloroethane	< 5.0	< 500
Benzene	< 5.0	< 500
cis-1,3-Dichloropropene	< 5.0	< 500
2-Chloroethyl Vinyl Ether	< 10	< 1,000
Bromoform	< 5.0	< 500
Tetrachloroethene	< 5.0	< 500
1,1,2,2-Tetrachloroethane	< 5.0	< 500
Toluene	< 5.0	< 500
Chlorobenzene	< 5.0	< 500
Ethylbenzene	< 5.0	< 500
m-Xylene	< 5.0	< 500
o,p-Xylene	< 5.0	< 500
Units	(ug/l)	(ug/kg)

V. Analytical Results (Cont'd)

AnalytiK

Volatile Organics

Parameter	Method Blank 6	Sample Designation A83432-15 D
Chloromethane	< 10	< 124
Bromomethane	< 10	< 124
Vinyl Chloride	< 10	< 124
Chloroethane	< 10	< 124
Methylene Chloride	< 5.0	59
2-Propanone (Acetone)	< 100	9,400 *
1,1-Dichloroethene	< 5.0	< 62
1,1-Dichloroethane	< 5.0	< 62
trans-1,2-Dichloroethene	< 5.0	< 62
Chloroform	< 5.0	< 62
1,2-Dichloroethane	< 5.0	< 62
1,1,1-Trichloroethane	< 5.0	< 62
Carbon Tetrachloride	< 5.0	< 62
Bromodichloromethane	< 5.0	< 62
1,2-Dichloropropane	< 5.0	< 62
trans-1,3-Dichloropropene	< 5.0	< 62
Trichloroethene	< 5.0	< 62
Dibromochloromethane	< 5.0	< 62
1,1,2-Trichloroethane	< 5.0	< 62
Benzene	< 5.0	< 62
cis-1,3-Dichloropropene	< 5.0	< 62
2-Chloroethyl Vinyl Ether	< 10	< 124
Bromoform	< 5.0	< 62
Tetrachloroethene	< 5.0	< 62
1,1,2,2-Tetrachloroethane	< 5.0	< 62
Toluene	< 5.0	290
Chlorobenzene	< 5.0	< 62
Ethylbenzene	< 5.0	< 62
m-Xylene	< 5.0	< 62
o,p-Xylene	< 5.0	< 62
Units	(ug/l)	(ug/l)

* Result obtained from rerun due to saturation in original run.

V. Analytical Results (Cont'd)

AnalytiKE

Semivolatile Organics (Page 1 of 2)

Parameter	Sample Designation: Method Blank 1	A83432-1 OW
N-Nitrosodimethylamine	< 170	< 170
Phenol	< 170	< 170
Bis(2-chloroethyl) Ether	< 170	< 170
2-Chlorophenol	< 170	< 170
1,3-Dichlorobenzene	< 170	< 170
1,4-Dichlorobenzene	< 170	< 170
Benzyl Alcohol	< 170	< 170
1,2-Dichlorobenzene	< 170	< 170
2-Methylphenol	< 170	< 170
Bis(2-chloroisopropyl) Ether	< 170	< 170
4-Methylphenol	< 170	< 170
N-Nitrosodipropylamine	< 170	< 170
Hexachloroethane	< 170	< 170
Nitrobenzene	< 170	< 170
Isophorone	< 170	< 170
2-Nitrophenol	< 170	< 170
2,4-Dimethylphenol	< 170	< 170
Bis(2-chloroethoxy)methane	< 170	< 170
2,4-Dichlorophenol	< 170	< 170
1,2,4-Trichlorobenzene	< 170	< 170
Naphthalene	< 170	< 170
Hexachlorobutadiene	< 170	< 170
4-Chloro-3-methylphenol	< 170	< 170
Hexachlorocyclopentadiene	< 170	< 170
2,4,6-Trichlorophenol	< 170	< 170
2-Chloronaphthalene	< 170	< 170
Dimethyl Phthalate	< 170	< 170
Acenaphthylene	< 170	< 170
Acenaphthene	< 170	< 170
2,4-Dinitrophenol	< 850	< 850
Units	(ug/l)	(ug/l)

IX. Analytical Results (Cont'd)

AnalytiK

Semivolatile Organics (Page 2 of 2)

Parameter	Sample Designation: Method Blank 1	A83432-1 OW
4-Nitrophenol	< 850	< 850
2,4-Dinitrotoluene	< 170	< 170
2,6-Dinitrotoluene	< 170	< 170
Diethyl Phthalate	< 170	< 170
4-Chlorophenyl Phenyl Ether	< 170	< 170
Fluorene	< 170	< 170
4,6-Dinitro-2-methylphenol	< 850	< 850
N-Nitrosodiphenylamine	< 170	< 170
4-Bromophenyl Phenyl Ether	< 170	< 170
Hexachlorobenzene	< 170	< 170
Pentachlorophenol	< 850	< 850
Phenanthrene	< 170	< 170
Anthracene	< 170	< 170
Dibutyl Phthalate	< 170	1,500
Fluoranthene	< 170	< 170
Benzidine	< 850	< 850
Pyrene	< 170	< 170
Butylbenzyl Phthalate	< 170	< 170
3,3'-Dichlorobenzidine	< 340	< 340
Benzo(a)anthracene	< 170	< 170
Bis(2-ethylhexyl) Phthalate	< 170	240
Chrysene	< 170	< 170
Dioctyl Phthalate	< 170	< 170
Benzo(b)fluoranthene	< 170	< 170
Benzo(k)fluoranthene	< 170	< 170
Benzo(a)pyrene	< 170	< 170
Indeno(1,2,3-cd)pyrene	< 170	< 170
Dibenzo(a,h)anthracene	< 170	< 170
Benzo(g,h,i)perylene	< 170	< 170
Units	(ug/l)	(ug/l)

AnalytiKE

V. Analytical Results (Cont'd)

Semivolatile Organics (Page 1 of 2)

Parameter	Sample Designation: Method Blank 2	A83432-15 D
N-Nitrosodimethylamine	< 10	< 250
Phenol	< 10	< 250
Bis(2-chloroethyl) Ether	< 10	< 250
2-Chlorophenol	< 10	< 250
1,3-Dichlorobenzene	< 10	< 250
1,4-Dichlorobenzene	< 10	< 250
Benzyl Alcohol	< 10	< 250
1,2-Dichlorobenzene	< 10	< 250
2-Methylphenol	< 10	< 250
Bis(2-chloroisopropyl) Ether	< 10	< 250
4-Methylphenol	< 10	< 250
N-Nitrosodipropylamine	< 10	< 250
Hexachloroethane	< 10	< 250
Nitrobenzene	< 10	< 250
Isophorone	< 10	< 250
2-Nitrophenol	< 10	< 250
2,4-Dimethylphenol	< 10	< 250
Bis(2-chloroethoxy)methane	< 10	< 250
2,4-Dichlorophenol	< 10	< 250
1,2,4-Trichlorobenzene	< 10	< 250
Naphthalene	< 10	< 250
Hexachlorobutadiene	< 10	< 250
4-Chloro-3-methylphenol	< 10	< 250
Hexachlorocyclopentadiene	< 10	< 250
2,4,6-Trichlorophenol	< 10	< 250
2-Chloronaphthalene	< 10	< 250
Dimethyl Phthalate	< 10	< 250
Acenaphthylene	< 10	< 250
Acenaphthene	< 10	< 250
2,4-Dinitrophenol	< 10	< 1,200
Units	(ug/l)	(ug/l)

IX. Analytical Results (Cont'd)

Analytik

Semivolatile Organics (Page 2 of 2)

Parameter	Sample Designation: Method Blank 2	A83432-15 D
4-Nitrophenol	< 50	< 1,200
2,4-Dinitrotoluene	< 10	< 250
2,6-Dinitrotoluene	< 10	< 250
Diethyl Phthalate	< 10	< 250
4-Chlorophenyl Phenyl Ether	< 10	< 250
Fluorene	< 10	< 250
4,6-Dinitro-2-methylphenol	< 50	< 1,200
N-Nitrosodiphenylamine	< 10	< 250
4-Bromophenyl Phenyl Ether	< 10	< 250
Hexachlorobenzene	< 10	< 250
Pentachlorophenol	< 10	< 250
Phenanthrene	< 10	< 250
Anthracene	< 10	< 250
Dibutyl Phthalate	< 10	< 250
Fluoranthene	< 10	< 250
Benzidine	< 50	< 1,200
Pyrene	< 10	< 250
Butylbenzyl Phthalate	< 10	350
3,3'-Dichlorobenzidine	< 20	< 500
Benzo(a)anthracene	< 10	< 250
Bis(2-ethylhexyl) Phthalate	24	< 250
Chrysene	< 10	< 250
Dioctyl Phthalate	< 10	< 250
Benzo(b)fluoranthene	< 10	< 250
Benzo(k)fluoranthene	< 10	< 250
Benzo(a)pyrene	< 10	< 250
Indeno(1,2,3-cd)pyrene	< 10	< 250
Dibenzo(a,h)anthracene	< 10	< 250
Benzo(g,h,i)perylene	< 10	< 250
Units	(ug/l)	(ug/l)

V. Analytical Results (Cont'd)

AnalytiKE

Semivolatile Organics (Page 1 of 2)

Parameter	Sample Designation: Method Blank 3	A83432-16 DL
N-Nitrosodimethylamine	< 10	< 500
Phenol	< 10	< 500
Bis(2-chloroethyl) Ether	< 10	< 500
2-Chlorophenol	< 10	< 500
1,3-Dichlorobenzene	< 10	< 500
1,4-Dichlorobenzene	< 10	< 500
Benzyl Alcohol	< 10	< 500
1,2-Dichlorobenzene	< 10	< 500
2-Methylphenol	< 10	< 500
Bis(2-chloroisopropyl) Ether	< 10	< 500
4-Methylphenol	< 10	< 500
N-Nitrosodipropylamine	< 10	< 500
Hexachloroethane	< 10	< 500
Nitrobenzene	< 10	< 500
Isophorone	< 10	< 500
2-Nitrophenol	< 10	< 500
2,4-Dimethylphenol	< 10	< 500
Bis(2-chloroethoxy)methane	< 10	< 500
2,4-Dichlorophenol	< 10	< 500
1,2,4-Trichlorobenzene	< 10	< 500
Naphthalene	< 10	< 500
Hexachlorobutadiene	< 10	< 500
4-Chloro-3-methylphenol	< 10	< 500
Hexachlorocyclopentadiene	< 10	< 500
2,4,6-Trichlorophenol	< 10	< 500
2-Chloronaphthalene	< 10	< 500
Dimethyl Phthalate	< 10	< 500
Acenaphthylene	< 10	< 500
Acenaphthene	< 10	< 500
2,4-Dinitrophenol	< 10	< 2,500
Units	(ug/l)	(ug/l)

IX. Analytical Results (Cont'd)

AnalytiKE

Semivolatile Organics (Page 2 of 2)

Parameter	Sample Designation: Method Blank 3	A83432-16 DL
4-Nitrophenol	< 50	< 2,500
2,4-Dinitrotoluene	< 10	< 500
2,6-Dinitrotoluene	< 10	< 500
Diethyl Phthalate	< 10	< 500
4-Chlorophenyl Phenyl Ether	< 10	< 500
Fluorene	< 10	< 500
4,6-Dinitro-2-methylphenol	< 50	< 2,500
N-Nitrosodiphenylamine	< 10	< 500
4-Bromophenyl Phenyl Ether	< 10	< 500
Hexachlorobenzene	< 10	< 500
Pentachlorophenol	< 10	< 500
Phenanthrene	< 10	< 500
Anthracene	< 10	< 500
Dibutyl Phthalate	< 10	< 500
Fluoranthene	< 10	< 500
Benzidine	< 50	< 2,500
Pyrene	< 10	< 500
Butylbenzyl Phthalate	< 10	510
3,3'-Dichlorobenzidine	< 20	< 500
Benzo(a)anthracene	< 10	< 500
Bis(2-ethylhexyl) Phthalate	24	360
Chrysene	< 10	< 500
Dioctyl Phthalate	< 10	< 500
Benzo(b)fluoranthene	< 10	< 500
Benzo(k)fluoranthene	< 10	< 500
Benzo(a)pyrene	< 10	< 500
Indeno(1,2,3-cd)pyrene	< 10	< 500
Dibenzo(a,h)anthracene	< 10	< 500
Benzo(g,h,i)perylene	< 10	< 500
Units	(ug/l)	(ug/l)

V. Analytical Results (Cont'd)

AnalytiKE

Semivolatile Organics (Page 1 of 2)

Parameter	Method Blank 4	A83432-5 SB-4	A83432-7 SB-6
	Sample Designation		
N-Nitrosodimethylamine	< 330	< 330	< 330
Phenol	< 330	< 330	< 330
Bis(2-chloroethyl) Ether	< 330	< 330	< 330
2-Chlorophenol	< 330	< 330	< 330
1,3-Dichlorobenzene	< 330	< 330	< 330
1,4-Dichlorobenzene	< 330	< 330	< 330
Benzyl Alcohol	< 330	< 330	< 330
1,2-Dichlorobenzene	< 330	< 330	< 330
2-Methylphenol	< 330	< 330	< 330
Bis(2-chloroisopropyl) Ether	< 330	< 330	< 330
4-Methylphenol	< 330	< 330	< 330
N-Nitrosodipropylamine	< 330	< 330	< 330
Hexachloroethane	< 330	< 330	< 330
Nitrobenzene	< 330	< 330	< 330
Isophorone	< 330	< 330	< 330
2-Nitrophenol	< 330	< 330	< 330
2,4-Dimethylphenol	< 330	< 330	< 330
Bis(2-chloroethoxy)methane	< 330	< 330	< 330
2,4-Dichlorophenol	< 330	< 330	< 330
1,2,4-Trichlorobenzene	< 330	< 330	< 330
Naphthalene	< 330	< 330	< 330
Hexachlorobutadiene	< 330	< 330	< 330
4-Chloro-3-methylphenol	< 330	< 330	< 330
Hexachlorocyclopentadiene	< 330	< 330	< 330
2,4,6-Trichlorophenol	< 330	< 330	< 330
2-Chloronaphthalene	< 330	< 330	< 330
Dimethyl Phthalate	< 330	< 330	< 330
Acenaphthylene	< 330	< 330	< 330
Acenaphthene	< 330	< 330	< 330
2,4-Dinitrophenol	< 1,600	< 1,600	< 1,600
Units	(ug/kg)	(ug/kg)	(ug/kg)

IX. Analytical Results (Cont'd)

AnalytiKE

Semivolatile Organics (Page 2 of 2)

Parameter	Method Blank 4	A83432-5 SB-4	A83432-7 SB-6
	Sample Designation		
4-Nitrophenol	< 1,600	< 1,600	< 1,600
2,4-Dinitrotoluene	< 330	< 330	< 330
2,6-Dinitrotoluene	< 330	< 330	< 330
Diethyl Phthalate	< 330	< 330	< 330
4-Chlorophenyl Phenyl Ether	< 330	< 330	< 330
Fluorene	< 330	< 330	< 330
4,6-Dinitro-2-methylphenol	< 1,600	< 1,600	< 1,600
N-Nitrosodiphenylamine	< 330	< 330	< 330
4-Bromophenyl Phenyl Ether	< 330	< 330	< 330
Hexachlorobenzene	< 330	< 330	< 330
Pentachlorophenol	< 330	< 330	< 330
Phenanthrene	< 330	< 330	< 330
Anthracene	< 330	< 330	< 330
Dibutyl Phthalate	< 330	< 330	< 330
Fluoranthene	< 330	< 330	< 330
Benzidine	< 1,600	< 1,600	< 1,600
Pyrene	< 330	< 330	< 330
Butylbenzyl Phthalate	< 330	< 330	< 330
3,3'-Dichlorobenzidine	< 660	< 660	< 660
Benzo(a)anthracene	< 330	< 330	< 330
Bis(2-ethylhexyl) Phthalate	< 330	< 330	< 330
Chrysene	< 330	< 330	< 330
Dioctyl Phthalate	< 330	< 330	< 330
Benzo(b)fluoranthene	< 330	< 330	< 330
Benzo(k)fluoranthene	< 330	< 330	< 330
Benzo(a)pyrene	< 330	< 330	< 330
Indeno(1,2,3-cd)pyrene	< 330	< 330	< 330
Dibenzo(a,h)anthracene	< 330	< 330	< 330
Benzo(g,h,i)perylene	< 330	< 330	< 330
Units	(ug/kg)	(ug/kg)	(ug/kg)

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V. Analytical Results (Cont'd)

Semivolatile Organics (Page 1 of 2)

Parameter	Method Blank 4	Sample Designation A83432-8 SB-7	A83432-9 SB-8
N-Nitrosodimethylamine	< 330	< 330	< 330
Phenol	< 330	< 330	< 330
Bis(2-chloroethyl) Ether	< 330	< 330	< 330
2-Chlorophenol	< 330	< 330	< 330
1,3-Dichlorobenzene	< 330	< 330	< 330
1,4-Dichlorobenzene	< 330	< 330	< 330
Benzyl Alcohol	< 330	< 330	< 330
1,2-Dichlorobenzene	< 330	< 330	< 330
2-Methylphenol	< 330	< 330	< 330
Bis(2-chloroisopropyl) Ether	< 330	< 330	< 330
4-Methylphenol	< 330	< 330	< 330
N-Nitrosodipropylamine	< 330	< 330	< 330
Hexachloroethane	< 330	< 330	< 330
Nitrobenzene	< 330	< 330	< 330
Isophorone	< 330	< 330	< 330
2-Nitrophenol	< 330	< 330	< 330
2,4-Dimethylphenol	< 330	< 330	< 330
Bis(2-chloroethoxy)methane	< 330	< 330	< 330
2,4-Dichlorophenol	< 330	< 330	< 330
1,2,4-Trichlorobenzene	< 330	< 330	< 330
Naphthalene	< 330	< 330	< 330
Hexachlorobutadiene	< 330	< 330	< 330
4-Chloro-3-methylphenol	< 330	< 330	< 330
Hexachlorocyclopentadiene	< 330	< 330	< 330
2,4,6-Trichlorophenol	< 330	< 330	< 330
2-Chloronaphthalene	< 330	< 330	< 330
Dimethyl Phthalate	< 330	< 330	< 330
Acenaphthylene	< 330	< 330	< 330
Acenaphthene	< 330	< 330	< 330
2,4-Dinitrophenol	< 1,600	< 1,600	< 1,600
Units	(ug/kg)	(ug/kg)	(ug/kg)

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IX. Analytical Results (Cont'd)

Semivolatile Organics (Page 2 of 2)

Parameter	Method Blank 4	A83432-8 SB-7	A83432-9 SB-8
	Sample Designation		
4-Nitrophenol	< 1,600	< 1,600	< 1,600
2,4-Dinitrotoluene	< 330	< 330	< 330
2,6-Dinitrotoluene	< 330	< 330	< 330
Diethyl Phthalate	< 330	< 330	< 330
4-Chlorophenyl Phenyl Ether	< 330	< 330	< 330
Fluorene	< 330	< 330	< 330
4,6-Dinitro-2-methylphenol	< 1,600	< 1,600	< 1,600
N-Nitrosodiphenylamine	< 330	< 330	< 330
4-Bromophenyl Phenyl Ether	< 330	< 330	< 330
Hexachlorobenzene	< 330	< 330	< 330
Pentachlorophenol	< 330	< 330	< 330
Phenanthrene	< 330	< 330	< 330
Anthracene	< 330	< 330	< 330
Dibutyl Phthalate	< 330	< 330	< 330
Fluoranthene	< 330	< 330	< 330
Benzidine	< 1,600	< 1,600	< 1,600
Pyrene	< 330	< 330	< 330
Butylbenzyl Phthalate	< 330	< 330	< 330
3,3'-Dichlorobenzidine	< 660	< 660	< 660
Benzo(a)anthracene	< 330	< 330	< 330
Bis(2-ethylhexyl) Phthalate	< 330	< 330	< 330
Chrysene	< 330	< 330	< 330
Dioctyl Phthalate	< 330	< 330	< 330
Benzo(b)fluoranthene	< 330	< 330	< 330
Benzo(k)fluoranthene	< 330	< 330	< 330
Benzo(a)pyrene	< 330	< 330	< 330
Indeno(1,2,3-cd)pyrene	< 330	< 330	< 330
Dibenzo(a,h)anthracene	< 330	< 330	< 330
Benzo(g,h,i)perylene	< 330	< 330	< 330
Units	(ug/kg)	(ug/kg)	(ug/kg)

V. Analytical Results (Cont'd)

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Semivolatile Organics (Page 1 of 2)

Parameter	Method Blank 4	Sample Designation A83432-10 SB-9	A83432-12 SB-11
N-Nitrosodimethylamine	< 330	< 330	< 330
Phenol	< 330	< 330	< 330
Bis(2-chloroethyl) Ether	< 330	< 330	< 330
2-Chlorophenol	< 330	< 330	< 330
1,3-Dichlorobenzene	< 330	< 330	< 330
1,4-Dichlorobenzene	< 330	< 330	< 330
Benzyl Alcohol	< 330	< 330	< 330
1,2-Dichlorobenzene	< 330	< 330	< 330
2-Methylphenol	< 330	< 330	< 330
Bis(2-chloroisopropyl) Ether	< 330	< 330	< 330
4-Methylphenol	< 330	< 330	< 330
N-Nitrosodipropylamine	< 330	< 330	< 330
Hexachloroethane	< 330	< 330	< 330
Nitrobenzene	< 330	< 330	< 330
Isophorone	< 330	< 330	< 330
2-Nitrophenol	< 330	< 330	< 330
2,4-Dimethylphenol	< 330	< 330	< 330
Bis(2-chloroethoxy)methane	< 330	< 330	< 330
2,4-Dichlorophenol	< 330	< 330	< 330
1,2,4-Trichlorobenzene	< 330	< 330	< 330
Naphthalene	< 330	< 330	< 330
Hexachlorobutadiene	< 330	< 330	< 330
4-Chloro-3-methylphenol	< 330	< 330	< 330
Hexachlorocyclopentadiene	< 330	< 330	< 330
2,4,6-Trichlorophenol	< 330	< 330	< 330
2-Chloronaphthalene	< 330	< 330	< 330
Dimethyl Phthalate	< 330	< 330	< 330
Acenaphthylene	< 330	< 330	< 330
Acenaphthene	< 330	< 330	< 330
2,4-Dinitrophenol	< 1,600	< 1,600	< 1,600
Units	(ug/kg)	(ug/kg)	(ug/kg)

IX. Analytical Results (Cont'd)

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Semivolatile Organics (Page 2 of 2)

Parameter	Method Blank 4	A83432-10 SB-9	A83432-12 SB-11
		Sample Designation	
4-Nitrophenol	< 1,600	< 1,600	< 1,600
2,4-Dinitrotoluene	< 330	< 330	< 330
2,6-Dinitrotoluene	< 330	< 330	< 330
Diethyl Phthalate	< 330	< 330	< 330
4-Chlorophenyl Phenyl Ether	< 330	< 330	< 330
Fluorene	< 330	< 330	< 330
4,6-Dinitro-2-methylphenol	< 1,600	< 1,600	< 1,600
N-Nitrosodiphenylamine	< 330	< 330	< 330
4-Bromophenyl Phenyl Ether	< 330	< 330	< 330
Hexachlorobenzene	< 330	< 330	< 330
Pentachlorophenol	< 330	< 330	< 330
Phenanthrene	< 330	< 330	< 330
Anthracene	< 330	< 330	< 330
Dibutyl Phthalate	< 330	< 330	< 330
Fluoranthene	< 330	< 330	< 330
Benzidine	< 1,600	< 1,600	< 1,600
Pyrene	< 330	< 330	< 330
Butylbenzyl Phthalate	< 330	< 330	< 330
3,3'-Dichlorobenzidine	< 660	< 660	< 660
Benzo(a)anthracene	< 330	< 330	< 330
Bis(2-ethylhexyl) Phthalate	< 330	< 330	< 330
Chrysene	< 330	< 330	< 330
Dioctyl Phthalate	< 330	< 330	< 330
Benzo(b)fluoranthene	< 330	< 330	< 330
Benzo(k)fluoranthene	< 330	< 330	< 330
Benzo(a)pyrene	< 330	< 330	< 330
Indeno(1,2,3-cd)pyrene	< 330	< 330	< 330
Dibenzo(a,h)anthracene	< 330	< 330	< 330
Benzo(g,h,i)perylene	< 330	< 330	< 330
Units	(ug/kg)	(ug/kg)	(ug/kg)

V. Analytical Results (Cont'd)

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Semivolatile Organics (Page 1 of 2)

Parameter	Method Blank 5	Sample Designation A83432-13 SB-12	A83432-14 SB-13
N-Nitrosodimethylamine	< 330	< 330	< 330
Phenol	< 330	< 330	< 330
Bis(2-chloroethyl) Ether	< 330	< 330	< 330
2-Chlorophenol	< 330	< 330	< 330
1,3-Dichlorobenzene	< 330	< 330	< 330
1,4-Dichlorobenzene	< 330	< 330	< 330
Benzyl Alcohol	< 330	< 330	< 330
1,2-Dichlorobenzene	< 330	< 330	< 330
2-Methylphenol	< 330	< 330	< 330
Bis(2-chloroisopropyl) Ether	< 330	< 330	< 330
4-Methylphenol	< 330	< 330	< 330
N-Nitrosodipropylamine	< 330	< 330	< 330
Hexachloroethane	< 330	< 330	< 330
Nitrobenzene	< 330	< 330	< 330
Isophorone	< 330	< 330	< 330
2-Nitrophenol	< 330	< 330	< 330
2,4-Dimethylphenol	< 330	< 330	< 330
Bis(2-chloroethoxy)methane	< 330	< 330	< 330
2,4-Dichlorophenol	< 330	< 330	< 330
1,2,4-Trichlorobenzene	< 330	< 330	< 330
Naphthalene	< 330	< 330	< 330
Hexachlorobutadiene	< 330	< 330	< 330
4-Chloro-3-methylphenol	< 330	< 330	< 330
Hexachlorocyclopentadiene	< 330	< 330	< 330
2,4,6-Trichlorophenol	< 330	< 330	< 330
2-Chloronaphthalene	< 330	< 330	< 330
Dimethyl Phthalate	< 330	< 330	< 330
Acenaphthylene	< 330	< 330	< 330
Acenaphthene	< 330	< 330	< 330
2,4-Dinitrophenol	< 1,600	< 1,600	< 1,600
Units	(ug/kg)	(ug/kg)	(ug/kg)

IX. Analytical Results (Cont'd)

Analytik

Semivolatile Organics (Page 2 of 2)

Parameter	Method Blank 5	A83432-13 SB-12	A83432-14 SB-13
	Sample Designation		
4-Nitrophenol	< 1,600	< 1,600	< 1,600
2,4-Dinitrotoluene	< 330	< 330	< 330
2,6-Dinitrotoluene	< 330	< 330	< 330
Diethyl Phthalate	< 330	< 330	< 330
4-Chlorophenyl Phenyl Ether	< 330	< 330	< 330
Fluorene	< 330	< 330	< 330
4,6-Dinitro-2-methylphenol	< 1,600	< 1,600	< 1,600
N-Nitrosodiphenylamine	< 330	< 330	< 330
4-Bromophenyl Phenyl Ether	< 330	< 330	< 330
Hexachlorobenzene	< 330	< 330	< 330
Pentachlorophenol	< 330	< 330	< 330
Phenanthrene	< 330	< 330	< 330
Anthracene	< 330	< 330	< 330
Dibutyl Phthalate	< 330	< 330	< 330
Fluoranthene	< 330	< 330	< 330
Benzidine	< 1,600	< 1,600	< 1,600
Pyrene	< 330	1,400	< 330
Butylbenzyl Phthalate	< 330	< 330	< 330
3,3'-Dichlorobenzidine	< 660	< 660	< 660
Benzo(a)anthracene	< 330	450	< 330
Bis(2-ethylhexyl) Phthalate	< 330	< 330	< 330
Chrysene	< 330	560	< 330
Dioctyl Phthalate	< 330	< 330	< 330
Benzo(b)fluoranthene	< 330	< 330	< 330
Benzo(k)fluoranthene	< 330	< 330	< 330
Benzo(a)pyrene	< 330	< 330	< 330
Indeno(1,2,3-cd)pyrene	< 330	< 330	< 330
Dibenzo(a,h)anthracene	< 330	< 330	< 330
Benzo(g,h,i)perylene	< 330	< 330	< 330
Units	(ug/kg)	(ug/kg)	(ug/kg)

V. Analytical Results (Cont'd)

Analytik

Semivolatile Organics (Page 1 of 2)

Parameter	Sample Designation: Method Blank 6	A83432-11 SB-10
N-Nitrosodimethylamine	< 330	< 330
Phenol	< 330	< 330
Bis(2-chloroethyl) Ether	< 330	< 330
2-Chlorophenol	< 330	< 330
1,3-Dichlorobenzene	< 330	< 330
1,4-Dichlorobenzene	< 330	< 330
Benzyl Alcohol	< 330	< 330
1,2-Dichlorobenzene	< 330	< 330
2-Methylphenol	< 330	< 330
Bis(2-chloroisopropyl) Ether	< 330	< 330
4-Methylphenol	< 330	< 330
N-Nitrosodipropylamine	< 330	< 330
Hexachloroethane	< 330	< 330
Nitrobenzene	< 330	< 330
Isophorone	< 330	< 330
2-Nitrophenol	< 330	< 330
2,4-Dimethylphenol	< 330	< 330
Bis(2-chloroethoxy)methane	< 330	< 330
2,4-Dichlorophenol	< 330	< 330
1,2,4-Trichlorobenzene	< 330	< 330
Naphthalene	< 330	< 330
Hexachlorobutadiene	< 330	< 330
4-Chloro-3-methylphenol	< 330	< 330
Hexachlorocyclopentadiene	< 330	< 330
2,4,6-Trichlorophenol	< 330	< 330
2-Chloronaphthalene	< 330	< 330
Dimethyl Phthalate	< 330	< 330
Acenaphthylene	< 330	< 330
Acenaphthene	< 330	< 330
2,4-Dinitrophenol	< 1,600	< 1,600
Units	(ug/kg)	(ug/kg)

IX. Analytical Results (Cont'd)

AnalytiKE

Semivolatile Organics (Page 2 of 2)

Parameter	Sample Designation: Method Blank 6	A83432-11 SB-10
4-Nitrophenol	< 1,600	< 1,600
2,4-Dinitrotoluene	< 330	< 330
2,6-Dinitrotoluene	< 330	< 330
Diethyl Phthalate	< 330	< 330
4-Chlorophenyl Phenyl Ether	< 330	< 330
Fluorene	< 330	< 330
4,6-Dinitro-2-methylphenol	< 1,600	< 1,600
N-Nitrosodiphenylamine	< 330	< 330
4-Bromophenyl Phenyl Ether	< 330	< 330
Hexachlorobenzene	< 330	< 330
Pentachlorophenol	< 330	< 330
Phenanthrene	< 330	< 330
Anthracene	< 330	< 330
Dibutyl Phthalate	< 330	< 330
Fluoranthene	< 330	< 330
Benzidine	< 1,600	< 1,600
Pyrene	< 330	< 330
Butylbenzyl Phthalate	< 330	< 330
3,3'-Dichlorobenzidine	< 660	< 660
Benzo(a)anthracene	< 330	< 330
Bis(2-ethylhexyl) Phthalate	< 330	< 330
Chrysene	< 330	< 330
Dioctyl Phthalate	< 330	< 330
Benzo(b)fluoranthene	< 330	< 330
Benzo(k)fluoranthene	< 330	< 330
Benzo(a)pyrene	< 330	< 330
Indeno(1,2,3-cd)pyrene	< 330	< 330
Dibenzo(a,h)anthracene	< 330	< 330
Benzo(g,h,i)perylene	< 330	< 330
Units	(ug/kg)	(ug/kg)

V. Analytical Results (Cont'd)

Analytik

Pesticides and Polychlorinated Biphenyls

Parameter	Sample Designation: Method Blank 1	A83432-1 OW
alpha-BHC	< 350	< 350
beta-BHC	< 350	< 350
delta-BHC	< 350	< 350
gamma-BHC (Lindane)	< 350	< 350
Heptachlor	< 350	< 350
Aldrin	< 350	< 350
Heptachlor Epoxide	< 350	< 350
Endosulfan I	< 350	< 350
Dieldrin	< 350	< 350
4,4'-DDE	< 350	< 350
Endrin	< 350	< 350
Endosulfan II	< 350	< 350
4,4'-DDD	< 350	< 350
Endosulfan Sulfate	< 350	< 350
4,4'-DDT	< 350	< 350
Endrin Aldehyde	< 350	< 350
Methoxychlor	< 350	< 350
Chlordane	< 350	< 350
Toxaphene	< 350	< 350
Aroclor 1016	< 350	< 350
Aroclor 1221	< 350	< 350
Aroclor 1232	< 350	< 350
Aroclor 1242	< 350	< 350
Aroclor 1248	< 350	< 350
Aroclor 1254	< 350	< 350
Aroclor 1260	< 350	< 350
Units	(ug/l)	(ug/l)

Note: All compounds reported at levels exceeding the PQL have been confirm
by alternate column GC.

V. Analytical Results (Cont'd)

AnalytiKE

Pesticides and Polychlorinated Biphenyls

Parameter	Sample Designation: Method Blank 2	A83432-16 DL
alpha-BHC	< 10	< 10
beta-BHC	< 10	< 10
delta-BHC	< 10	< 10
gamma-BHC (Lindane)	< 10	< 10
Heptachlor	< 10	< 10
Aldrin	< 10	< 10
Heptachlor Epoxide	< 10	< 10
Endosulfan I	< 10	< 10
Dieldrin	< 10	< 10
4,4'-DDE	< 10	< 10
Endrin	< 10	< 10
Endosulfan II	< 10	< 10
4,4'-DDD	< 10	< 10
Endosulfan Sulfate	< 10	< 1,000 *
4,4'-DDT	< 10	< 10
Endrin Aldehyde	< 10	< 10
Methoxychlor	< 10	< 10
Chlordane	< 10	< 10
Toxaphene	< 10	< 10
Aroclor 1016	< 10	< 10
Aroclor 1221	< 10	< 10
Aroclor 1232	< 10	< 10
Aroclor 1242	< 10	< 10
Aroclor 1248	< 10	< 10
Aroclor 1254	< 10	< 10
Aroclor 1260	< 10	< 10
Units	(ug/l)	(ug/l)

Note: All compounds reported at levels exceeding the PQL have been confirme by alternate column GC.

* Detection limit raised due to dilution because of high concentration of non-targetted compounds.

V. Analytical Results (Cont'd)

Analytil

General Chromatography

Parameter	Method Blank	Sample Designation A83432-2 SB-1	A83432-3 SB-2
Jet Fuel	< 10,000	< 10,000	< 10,000
#2 Fuel Oil/Diesel Fuel	< 10,000	< 10,000	< 10,000
Kerosene	< 10,000	< 10,000	< 10,000
Units	(ug/kg)	(ug/kg)	(ug/kg)

V. Analytical Results (Cont'd)

Analytik.

Metals

Parameter	Method Blank 1	A83432-1 OW	A83432-1 (Duplicate) OW
	Sample Designation		
Antimony, total	< 60	< 60	< 60
Arsenic, total	< 10	41	43
Berillium, total	< 5.0	< 5.0	< 5.0
Cadmium, total	< 10	< 10	< 10
Chromium, total	< 50	92	80
Copper, total	< 50	1,200 *	1,200 *
Lead, total	< 50 *	97	93
Mercury, total	< 20	< 20	< 20
Nickel, total	< 40	41	< 40
Selenium, total	< 10	< 10	< 10
Silver, total	< 50	< 50	< 50
Thallium, total	< 40	< 40	< 40
Zinc, total	< 20	39,000	37,000
Units	(ug/l)	(ug/l)	(ug/l)

Parameter	Method Blank 1	A83432-15 D	A83432-15 (Duplicate) D
	Sample Designation		
Antimony, total	< 60	< 60	< 60
Arsenic, total	< 10	18	18
Berillium, total	< 5.0	< 5.0	< 5.0
Cadmium, total	< 10	11	< 10
Chromium, total	< 50	64	67
Copper, total	< 50	1,000	1,100
Lead, total	< 50 *	210 *	210 *
Mercury, total	< 20	< 20	< 20
Nickel, total	< 40	100	94
Selenium, total	< 10	< 10	< 10
Silver, total	< 50	< 50	< 50
Thallium, total	< 40	< 40	< 40
Zinc, total	< 20	13,000	13,000
Units	(ug/l)	(ug/l)	(ug/l)

* Result obtained from Method of Standard Edition.

V. Analytical Results (Cont'd)

AnalytiKE

Metals

Parameter	Sample Designation: Method Blank 2	A83432-16 DL	
Antimony, total	< 60	< 60	
Arsenic, total	< 10	14	
Berillium, total	< 5.0	< 5.0	
Cadmium, total	< 10	< 10	
Chromium, total	< 50	< 50	
Copper, total	< 50	590	
Lead, total	< 50	87	*
Mercury, total	< 2.0	< 2.0	
Nickel, total	< 40	78	
Selenium, total	< 10	< 10	
Silver, total	< 50	< 50	
Thallium, total	< 40	< 40	
Zinc, total	< 20	9,600	
Units	(ug/l)	(ug/l)	

* Result obtained from Method of Standard Edition.

V. Analytical Results (Cont'd)

AnalytiKl

General Chemistry

	Sample Designation	
Parameter	Method Blank 1	A83432-1 OW
Cyanide, total	< 20	< 20
Phenolics, total, as phenol	< 50	590
Units	(ug/l)	(ug/l)

	Sample Designation	
Parameter	Method Blank 2	A83432-15 D
Cyanide, total	< 20	< 20
Phenolics, total, as phenol	< 50	720
Units	(ug/l)	(ug/l)

	Sample Designation	
Parameter	Method Blank 3	A83432-16 DL
Cyanide, total	< 20	< 20
Phenolics, total, as phenol	< 50	270
Units	(ug/l)	(ug/l)

		Sample Designation	
Parameter	Method Blank	A83432-2 SB-1	A83432-3 SB-2
Oil and Grease	--	< 10,000	170,000
Units	(ug/kg)	(ug/kg)	(ug/kg)

VI. Quality Control Data

AnalytiKE

Volatile Organics

Nonaqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A83432-1

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery
1,1-Dichloroethene	0.25	98	98	0	D-234
Trichloroethene (TCE)	0.25	100	100	0	71-157
Benzene	0.25	100	99	1	37-151
Toluene	0.25	99	98	1	47-150
Chlorobenzene	0.25	97	98	1	37-160
Units	(ug)	(%)	(%)	(%)	(%)

Recovery: 0 out of 10 outside control limits

VI. Quality Control Data (Cont'd)

AnalytiKE

Volatile Organics

Nonaqueous Surrogate Recovery Data

Sample Designation	Surrogate Recovery 1,2-Dichloroethane-d_4 (50 ppb Added)	Toluene-d_8 (50 ppb Added)	4-Bromofluorobe (50 ppb Added)
Method Blank 1	104	99	97
A83432-1 Spike	78	82	81
A83432-1 Spike Dup.	80	81	80
A83432-1	67	65	63
Units	(%)	(%)	(%)
Control Limits	62-152	57-159	62-148

__0__ out of __12__ surrogate recoveries are outside control limits.

VI. Quality Control Data (Cont'd)

Analytil

Volatile Organics

Nonaqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A83409-2

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery
1,1-Dichloroethene	0.25	98	100	2	D-234
Trichloroethene (TCE)	0.25	102	100	2	71-157
Benzene	0.25	97	98	1	37-151
Toluene	0.25	97	98	1	47-150
Chlorobenzene	0.25	100	100	0	37-160
Units	(ug)	(%)	(%)	(%)	(%)

Recovery: 0 out of 10 outside control limits

VI. Quality Control Data (Cont'd)

AnalytiKl

Volatile Organics

Nonaqueous Surrogate Recovery Data

Sample Designation	Surrogate Recovery: 1,2-Dichloroethane-d_4 (100 ppb Added)	Toluene-d_8 (100 ppb Added)	4-Bromofluorob (100 ppb Added
Method Blank 2	109	97	96
A83409-2 Spike	86	89	89
A83409-2 Spike Dup.	86	89	89
A83432-4	107	103	103
A83432-6	108	101	102
Units	(%)	(%)	(%)
Control Limits	70-121	81-119	74-12:

__0__ out of __15__ surrogate recoveries are outside control limits.

VI. Quality Control Data (Cont'd)

Analyti

Volatile Organics

Aqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A83433-3

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
1,1-Dichloroethene	0.25	99	100	1	79-121	10
Trichloroethene (TCE)	0.25	96	102	6	82-120	7
Benzene	0.25	99	100	1	70-136	8
Toluene	0.25	100	99	1	74-128	15
Chlorobenzene	0.25	99	102	3	78-118	5
Units	(ug)	(%)	(%)	(%)	(%)	(%)

Recovery: 0 out of 10 outside control limits

RPD: 0 out of 5 outside control limits

VI. Quality Control Data (Cont'd)

Analytik

Volatile Organics

Aqueous Surrogate Recovery Data

Sample Designation	Surrogate Recovery 1,2-Dichloroethane-d_4 (50 ppb Added)	Toluene-d_8 (50 ppb Added)	4-Bromofluoro. (50 ppb Adde
Method Blank 3	105	104	101
A83433-3 Spike	98	100	98
A83433-3 Spike Dup.	100	101	99
A83432-16	104	102	100
Units	(%)	(%)	(%)
Control Limits	76-114	88-110	86-11

0 out of 12 surrogate recoveries are outside control limits.

VI. Quality Control Data (Cont'd)

Analytik

Volatile Organics

Nonaqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A83432-9

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery
1,1-Dichloroethene	0.25	97	95	2	D-234
Trichloroethene (TCE)	0.25	95	98	3	71-157
Benzene	0.25	97	96	1	37-151
Toluene	0.25	96	96	0	47-150
Chlorobenzene	0.25	95	95	0	37-160
Units	(ug)	(%)	(%)	(%)	(%)

Recovery: 0 out of 10 outside control limits

VI. Quality Control Data (Cont'd)

Analyti

Volatile Organics

Nonaqueous Surrogate Recovery Data

Sample Designation	Surrogate Recovery 1,2-Dichloroethane-d_4 (50 ppb Added)	Toluene-d_8 (50 ppb Added)	4-Bromofluor (50 ppb Adde
Method Blank 4	95	95	90
A83432-9 Spike	92	93	89
A83432-9 Spike Dup.	90	93	89
A83432-5	115	106	92
A83432-7	116	108	94
A83432-8	113	102	91
A83432-9	110	103	91
A83432-10	112	105	93
A83432-11	115	109	95
Units	(Z)	(Z)	(Z)
Control Limits	62-152	57-159	62-1

0 out of 27 surrogate recoveries are outside control limits.

VI. Quality Control Data (Cont'd)

AnalytiKl

Volatile Organics

Nonaqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A83409-2

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery
1,1-Dichloroethene	0.25	98	100	2	D-234
Trichloroethene (TCE)	0.25	102	100	2	71-157
Benzene	0.25	97	98	1	37-151
Toluene	0.25	97	98	1	47-150
Chlorobenzene	0.25	100	100	0	37-160
Units	(ug)	(%)	(%)	(%)	(%)

Recovery: 0 out of 10 outside control limits

VI. Quality Control Data (Cont'd)

AnalytiK

Volatile Organics

Nonaqueous Surrogate Recovery Data

Sample Designation	Surrogate Recovery: 1,2-Dichloroethane-d_4 (100 ppb Added)	Toluene-d_8 (100 ppb Added)	4-Bromofluorol (100 ppb Adde
Method Blank 5	101	102	98
A83409-2 Spike	86	89	89
A83409-2 Spike Dup.	86	89	89
A83432-12	98	98	98
A83432-13	102	102	102
A83432-14	101	101	98
Units	(%)	(%)	(%
Control Limits	70-121	81-117	74-12

__0__ out of __18__ surrogate recoveries are outside control limits.

VI. Quality Control Data (Cont'd)

Analytik

Volatile Organics

Aqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A75178-EFF

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
1,1-Dichloroethene	0.25	103	106	3	79-121	10
Trichloroethene (TCE)	0.25	102	96	6	82-120	7
Benzene	0.25	97	93	4	70-136	8
Toluene	0.25	98	95	3	74-128	15
Chlorobenzene	0.25	102	97	5	78-118	5
Units	(ug)	(%)	(%)	(%)	(%)	(%)

Recovery: 0 out of 10 outside control limits

RPD: 0 out of 5 outside control limits

VI. Quality Control Data (Cont'd)

Analytik

Volatile Organics

Aqueous Surrogate Recovery Data

Sample Designation	Surrogate Recovery: 1,2-Dichloroethane-d_4 (50 ppb Added)	Toluene-d_8 (50 ppb Added)	4-Bromofluorol (50 ppb Adde
Method Blank 6	128	109	104
A75178-EFF Spike	106	100	101
A75178-EFF Spike Dup.	99	97	96
A83432-15	130	109	110
Units	(%)	(%)	(%)
Control Limits	87-130	74-121	71-13

__0__ out of __12__ surrogate recoveries are outside control limits.

VI. Quality Control Data (Cont'd)

AnalytiKI

Semivolatile Organics

Aqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A75329-EFF

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
1,4-Dichlorobenzene	50	73	70	4	10-110	15
N-Nitrosodipropylamine	50	107	102	5	10-151	27
1,2,4-Trichlorobenzene	50	80	79	1	20-136	24
Acenaphthene	50	85	86	1	17-120	5
2,4-Dinitrotoluene	50	72	77	0	10-175	17
Pyrene	50	102	95	7	10-175	19
Phenol	100	42	41	2	10-130	18
2-Chlorophenol	100	75	72	4	47-106	16
4-Chloro-3-methylphenol	100	81	83	2	48-115	30
4-Nitrophenol	100	31	28	9	10-175	30
Pentachlorophenol	100	63	53	14	64-118	11
Pentachlorophenol +	100	77	--	--	64-118	11
Units	(ppb)	(%)	(%)	(%)	(%)	(%)

+ Spike performed on DI Water.

Recovery: 2 out of 23 outside control limits

RPD: 1 out of 11 outside control limits

VI. Quality Control Data (Cont'd)

Analyti

Semivolatile Organics

Aqueous Surrogate Recovery Data

Sample Designation	Surrogate Recovery 2-Fluorophenol (100 ppb Added)	Phenol-d_5 (100 ppb Added)	2,4,6-Tribromophe: (100 ppb Added)
Method Blank 1	28	21	50
Method Blank 2	37	27	101
Method Blank 3	37	27	74
A75329-EFF Spike	49	38	86
A75329-EFF Spike Dup.	47	38	85
A83432-1	29	27	79
A83432-15	*	*	*
A83432-16	*	*	*
Units	(Z)	(Z)	(Z)
Control Limits	10-90	10-90	10-142

Sample Designation	Surrogate Recovery Nitrobenzene-d_5 (50 ppb Added)	2-Fluorobiphenyl (50 ppb Added)	Terphenyl-d_{14} (50 ppb Added)
Method Blank 1	56	64	82
Method Blank 2	58	70	88
Method Blank 3	58	61	95
A75329-EFF Spike	74	79	104
A75329-EFF Spike Dup.	76	79	97
A83432-1	62	77	88
A83432-15	*	*	*
A83432-16	*	*	*
Units	(Z)	(Z)	(Z)
Control Limits	10-133	10-165	10-175

0 out of 36 surrogate recoveries are outside control limits.

* Not recovered due to dilution.

VI. Quality Control Data (Cont'd)

Analyti

Semivolatile Organics

Nonaqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A83410-1

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
1,4-Dichlorobenzene	50	60	66	9	18-120	43
N-Nitrosodipropylamine	50	62	68	9	10-156	31
1,2,4-Trichlorobenzene	50	70	73	4	24-161	17
Acenaphthene	50	85	84	1	10-151	16
2,4-Dinitrotoluene	50	67	62	8	10-197	33
Pyrene	50	74	80	8	10-167	31
Phenol	100	61	65	6	10-141	41
2-Chlorophenol	100	56	57	2	33-101	19
4-Chloro-3-methylphenol	100	64	64	0	26-117	25
4-Nitrophenol	100	39	46	17	10-221	36
Pentachlorophenol	100	71	67	6	10-179	16
Units	(ppb)	(%)	(%)	(%)	(%)	(%)

Recovery: 0 out of 22 outside control limits

RPD: 0 out of 11 outside control limits

VI. Quality Control Data (Cont'd)

AnalytiK

Semivolatile Organics

Nonaqueous Surrogate Recovery Data

Sample Designation	Surrogate Recovery 2-Fluorophenol (200 ppb Added)	Phenol-d_5 (200 ppb Added)	2,4,6-Tribromopheno (200 ppb Added)
Method Blank 4	44	46	45
Method Blank 5	53	62	64
Method Blank 6	44	52	43
A83410-1 Spike	48	53	99
A83410-1 Spike Dup.	50	55	95
A83432-5	49	52	65
A83432-7	55	60	71
A83432-8	49	50	73
A83432-9	51	56	75
A83432-10	54	59	78
A83432-11	13	28	*
A83432-12	29	31	44
A83432-13	39	51	51
A83432-14	27	27	36
Units	(Z)	(Z)	(Z)
Control Limits	27-106	30-88	42-89

Sample Designation	Surrogate Recovery Nitrobenzene-d_5 (100 ppb Added)	2-Fluorobiphenyl (100 ppb Added)	Terphenyl-d_{14} (100 ppb Added)
Method Blank 4	49	56	65
Method Blank 5	68	74	84
Method Blank 6	56	65	71
A83410-1 Spike	58	77	90
A83410-1 Spike Dup.	58	80	87
A83432-5	60	65	76
A83432-7	65	72	82
A83432-8	57	67	78
A83432-9	62	76	84
A83432-10	63	73	84
A83432-11	42	56	55
A83432-12	38	40	44
A83432-13	56	70	81
A83432-14	31	40	52
Units	(Z)	(Z)	(Z)
Control Limits	10-133	10-165	10-175

* Not recovered.

__9__ out of __83__ surrogate recoveries are outside control limits.

VI. Quality Control Data (Cont'd)

Analyt

Organochlorine Pesticides and Polychlorinated Biphenyls

Aqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Pesticide Sample Spiked A83334-1

PCB Sample Spiked A83432-1

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
alpha-BHC	100	*	*	--	61-149	17
alpha-BHC +	100	71	--	--	61-149	17
gamma-BHC (Lindane)	100	*	*	--	30-164	12
gamma-BHC (Lindane) +	100	61	--	--	30-164	12
Heptachlor	100	*	*	--	37-164	14
Heptachlor +	100	63	--	--	37-164	14
Endosulfan I	100	*	*	--	43-137	9
Endosulfan I +	100	84	--	--	43-137	9
Dieldrin	100	*	*	--	73-175	10
Dieldrin +	100	85	--	--	73-175	10
Endrin	500	*	*	--	29-175	17
Endrin +	500	103	--	--	29-175	17
4,4'-DDD	500	*	*	--	40-174	20
4,4'-DDD +	500	83	--	--	40-174	20
4,4'-DDT	500	*	*	--	79-154	9
4,4'-DDT +	500	168	--	--	79-154	9
Methoxychlor	100	*	*	--	10-175	15
Methoxychlor +	100	103	--	--	10-175	15
Toxaphene	2,000	*	*	--	70-130	30
Toxaphene +	2,000	75	--	--	70-130	30
Aroclor 1242	2,000	**	**	--	37-161	33
Aroclor 1242 +	2,000	89	--	--	37-161	33
Units	(ppb)	(%)	(%)	(%)	(%)	(%)

Recovery: 0 out of 11 outside control limits

* Not recovered due to dilution for nontargetted compounds.

** Not recovered due to matrix interference.

VI. Quality Control Data (Cont'd)

AnalytiK

Organochlorine Pesticides and Polychlorinated Biphenyls

Aqueous Surrogate Recovery Data and Retention Time Shift

Sample Designation	Dibutylchlorendate (100 ppb Added) Recovery	Retention Time Shift
Method Blank 1	58	0.7
A83334-1 Spike (Pest.)	*	--
A83334-1 Spike Dup. (Pest.)	*	--
DI Water Spike (Pest.)	67	0.5
A83334-1 Spike (Tox)	*	--
A83334-1 Spike Dup. (Tox)	*	--
DI Water Spike (Tox)	56	0.5
A83432-1 Spike (PCB)	**	--
A83432-1 Spike Dup. (PCB)	**	--
DI Water Spike (PCB)	89	0.2
A83432-1	23	0.08
Units	(%)	(%)
Control Limits	15-175	0-2

__0__ out of __5__ surrogate recoveries are outside control limits.

* Not recovered due to dilution for nontargetted compounds.

** Not recovered due to matrix interference.

VI. Quality Control Data (Cont'd)

Analyt

Organochlorine Pesticides and Polychlorinated Biphenyls

Aqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Pesticide Sample Spiked A75268-EFF

PCB Sample Spiked A75329-EFF

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
beta-BHC	100	98	49	67	57-141	16
beta-BHC +	100	94	--	--	57-141	16
delta-BHC	100	146	151	3	36-164	10
Aldrin	100	114	119	4	50-140	24
Heptachlor Epoxide	100	107	109	2	52-157	14
4,4'-DDE	100	127	130	2	37-154	40
Endosulfan II	500	121	140	15	36-175	9
Endosulfan II +	500	125	--	--	36-175	9
Endosulfan Sulfate	500	159	199	23	10-175	9
Endosulfan Sulfate +	500	156	--	--	10-175	9
Endrin Aldehyde	500	*	*	--	10-175	13
Endrin Aldehyde +	500	111	--	--	10-175	13
Toxaphene	2,000	88	87	1	70-130	30
Aroclor 1260	2,000	80	78	3	10-168	10
Units	(ppb)	(%)	(%)	(%)	(%)	(%)

Recovery: 2 out of 22 outside control limits

RPD: 3 out of 9 outside control limits

* Not recovered due to matrix interference.

VI. Quality Control Data (Cont'd)

AnalytiK

Organochlorine Pesticides and Polychlorinated Biphenyls

Aqueous Surrogate Recovery Data and Retention Time Shift

	Dibutylchlorendate (100 ppb Added)	
Sample Designation	Recovery	Retention Time Shift
Method Blank 2	101	0.4
A75268-EFF Spike (Pest.)	75	0.2
A75268-EFF Spike Dup. (Pest.)	69	0.2
DI Water Spike (Pest.)	84	0.2
A75268-EFF Spike (Tox)	88	0.08
A75268-EFF Spike Dup. (Tox)	87	0.2
A75329-EFF Spike (PCB)	32	0.2
A75329-EFF Spike Dup. (PCB)	29	0.2
A83432-16	*	--
A83432-16 Rerun	*	--
Units	(%)	(%)
Control Limits	15-175	0-2

__0__ out of __8__ surrogate recoveries are outside control limits.

* Not recovered due to matrix interference.

VI. Quality Control Data (Cont'd)

Analytik

General Chromatography

Nonaqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A83412-3

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
Kerosene	2,000	129	112	14	70-130	30
Units	(ppb)	(%)	(%)	(%)	(%)	(%)

Recovery: 0 out of 2 outside control limits

RPD: 0 out of 1 outside control limits

VI. Quality Control Data (Cont'd)

Analyt

Metals

Aqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A83432-15

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
Antimony	300	82	74	10	75-125	20
Antimony +	300	110	--	--	75-125	20
Arsenic	100	90	91	1	70-116	10
Beryllium	300	77	78	1	67-112	10
Cadmium	300	78	79	1	66-110	4
Chromium	300	78	78	0	72-106	4
Copper	300	79	83	5	71-111	20
Lead	300	97	98	1	65-110	4
Mercury	20	64	43	39	63-129	5
Mercury +	20	99	--	--	63-129	5
Nickel	300	78	75	4	66-111	7
Selenium	100	88	92	4	75-125	30
Silver	300	26	32	21	10-131	30
Thallium	100	86	84	2	43-140	31
Zinc	300	90	66	31	76-100	6
Zinc +	300	83	--	--	76-100	6
Units	(ppb)	(%)	(%)	(%)	(%)	(%)

+ Spike performed on DI Water.

Recovery: 3 out of 29 outside control limits

RPD: 2 out of 13 outside control limits

VI. Quality Control Data (Cont'd)

Metals

Aqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A83432-15

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
Antimony	300	82	74	10	75-125	20
Antimony +	300	110	--	--	75-125	20
Arsenic	100	90	91	1	70-116	10
Beryllium	300	77	78	1	67-112	10
Cadmium	300	78	79	1	66-110	4
Chromium	300	78	78	0	72-106	4
Copper	300	79	83	5	71-111	20
Lead	300	106	84	23	65-110	4
Mercury	20	64	43	39	63-129	5
Mercury +	20	99	--	--	63-129	5
Nickel	300	78	75	4	66-111	7
Selenium	100	52	67	16	75-125	30
Selenium +	100	98	--	--	75-125	30
Silver	300	26	32	21	10-131	30
Thallium	100	86	84	2	43-140	31
Zinc	300	90	60	31	76-100	6
Zinc +	300	83	--	--	76-100	6
Units	(ppb)	(%)	(%)	(%)	(%)	(%)

+ Spike performed on DI Water.

Recovery: 5 out of 30 outside control limits

RPD: 3 out of 13 outside control limits

VI. Quality Control Data (Cont'd)

Analyti

General Chemistry

Aqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Parameter	Sample Spiked	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control L Recovery
Cyanide	A75356-G	376.8	88	91	3	57-146
Phenolics	A83432-1	500	82	69	17	28-156
Units		(ppb)	(%)	(%)	(%)	(%)

Recovery: 0 out of 4 outside control limits

RPD: 0 out of 2 outside control limits

Aqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Parameter	Sample Spiked	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Lir Recovery	Ma RI
Cyanide	A75356-G	376.8	88	91	3	57-146	2
Phenolics	A83432-16	500	135	135	0	28-156	3
Units		(ppb)	(%)	(%)	(%)	(%)	(

Recovery: 0 out of 4 outside control limits

RPD: 0 out of 2 outside control limits

VI. Quality Control Data (Cont'd)

Analyt

General Chemistry

Nonaqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A30107-1

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
Oil and Grease	50,000	140	129	8	10-175	50
Units	(ug)	(%)	(%)	(%)	(%)	(%)

Recovery: 0 out of 2 outside control limits

RPD: 0 out of 1 outside control limits

☐ 28 Springdale Road
Cherry Hill, New Jersey 08003
(609) 751-1122 • (215) 923-2068
Fax: (609) 751-0824

☐ 2925 Richmond Avenue
Houston, Texas 77098
(713) 520-1495
Fax: (713) 523-7107

☐ 2324 Vernsdale Road
Rock Hill, South Carolina 29730
(803) 324-5310
Fax: (803) 324-3982

Analysis Request and Chain-of-Custody

Client ENSCI

Project: LP Staples

AnalytiKEM Contact Holly

LAB I.D. NO.	FIELD SAMPLE I.D. NO.	DATE	USE 24 HR. CLOCK TIME	MATRIX	40 ml vials	950 ml Org. Pres.	950 ml Unpres.	950 ml Unpres.	950 ml Unpres.	250 ml HNO_3	250 ml H_2SO_4	ml H_2SO_4	250 ml NaOH	500 ml UNPRES	250 UNPRES	ANALYSIS REQUESTED PARAMETERS
1	OW	4/2	1310	Aq	4	1	1	X	1	1		1				Full Priority Pollutant Include Acetone
2	SB-1	↓	1340	Sol										1		EPA 3550/9071
3	SB-2	4/2	1330	Sol										1		EPA ~~5030~~ 3550/907
4	SB-3		1445				1							X	1	EPA 8240-8270 Includ Acetone
5	SB-4		1410				1							X	1	EPA 8240-8270 Include Acetone
6	SB-5		1430				1							X	1	↓ ↓
7	SB-6		1515				1	1						X		↓ ↓
~~8~~	~~SB-7~~													X		
~~9~~	~~SB-8~~	↓		↓										X		

1. Field Measurements:
   Data Sheets: Y N
   Filtered: Y Not Required

2. Chain of Custody
   Seal No. _____

II. Field Conditions/Comments: _____

III. Special Instructions: Sample OW - VOA, SVOA, Metals
(Detection Limits, Data Package, etc.) Pest-PCBs, Phenols, Cyanide

Relinquished By:	Date/Time (use 24 hr. clock)	Received By:	Date/Time (use 24 hr. clock)
Print Name: Chris Boggs	4/3	Print Name: Fed Ex	4/3
Signature: Chris Boggs		Signature:	

] 28 Springdale Road
Cherry Hill, New Jersey 08003
(609) 751-1122 • (215) 923-2068
Fax: (609) 751-0824

☐ 2925 Richmond Avenue
Houston, Texas 77098
(713) 520-1495
Fax: (713) 523-7107

Analysis Request and Chain-of-Custody

☐ 2324 Vernsdale Road
Rock Hill, South Carolina 29730
(803) 324-5310
Fax: (803) 324-3982

Client ENSCI Project: LP Staples AnalytiKEM Contact Holly

B).).	FIELD SAMPLE I.D. NO.	DATE	USE 24 HR. CLOCK TIME	MATRIX	40 ml vials	950 ml Org. Pres.	500 ml Unpres.	250 ml Unpres.	125 ml HNO_3	250 ml H_2SO_4	ml H_2SO_4	250 ml NaOH			ANALYSIS REQUESTED PARAMETERS
	SB-7	4/2	1535	Soil			1	1							EPA 8240-8270 + Acetone
	SB-8		1540				1	1							
	SB-9		1600				1	1							EPA 8240-8270 + Acetone
	SB-10		1640				1	1							
	SB-11		1625				1	1							
	SB-12		1700												
	SB-13		1710												
	D		1730	Liquid	4	1	1		1	1		1			Full Priority Pollutant Scan To Include Acetone

Field Measurements:

Data Sheets: Y N

Filtered: Y Not Required

Chain of Custody

Seal No. _____

II. Field Conditions/Comments: _____

III. Special Instructions: (Detection Limits, Data Package, etc.) Sample D - VOA, SVOA, Metals, Pest-PCB, Phenols, Cyanide

Relinquished By:	Date/Time (use 24 hr. clock)	Received By:	Date/Time (use 24 hr. clock)
Print Name: Chris Boggs		Print Name: Fed Ex	4/2
Signature: Chris Boggs		Signature:	
	1/h	Print Name: Gren Barrett	4/2/97 7:00pm

AnalytiKEM An American NorKEM Company

28 Springdale Road
Cherry Hill, New Jersey 08003
(609) 751-1122 • (215) 923-2068
Fax: (609) 751-0824

RESAMPLE

Chain-of-Custody

8342-0

454 South Anderson Road BTC 532
Rock Hill, South Carolina 29730
(803) 329-9690
Fax: (803) 329-9689

Client ENSCI Project: LP Staples AnalytiKEM Contact Holly

SAMPLE DESIGNATION	DATE	MATRIX	40 ml vials	950 ml Org. Pres.	500 ml Unpres.	ml Unpres.	ml HNO_3	ml H_2SO_4	ml H_2SO_4	ml NaOH			PARAMETERS
SB-3	4/8 9:35	Soil			1								8240 + Acetone
SB-4	4/8 9:50	"			1								"

1. Field Measurements:
   Data Sheets: Y N
   Filtered: Y Not Required

P. O.# _____

II. Field Conditions/Comments: _____

III. Special Instructions: _____
(Detection Limits, Data Package, etc.)

Relinquished By:	Time/Date:	Received By:	Time/Date:
[signature]	4/8/93 1400	[signature]	4/8/93 1400

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28 Springdale Road
Cherry Hill, New Jersey 08003
(609) 751-1122 • (215) 923-2068
Fax: (609) 751-0824

Chain-of-Custody

454 South Anderson Road BTC 532
Rock Hill, South Carolina 29730
(803) 329-9690
Fax: (803) 329-9689

Client ENSCI Project: LP Staples Resample AnalytiKEM Contact Holly

SAMPLE DESIGNATION	DATE	MATRIX	40 ml vials	950 ml Org. Pres.	950 ml Unpres.	ml Unpres.	500 ml HNO_3	950 ml H_2SO_4	ml H_2SO_4	ml NaOH			PARAMETERS
DC	4/16/93	Aq	4	1	2 3		1	1					Priority Pollutants
													VOA, SVOA, PCB-Pest
													Metals, Phenols, Cyanide

1. Field Measurements:
   Data Sheets: Y N
   Filtered: Y Not Required

P. O.# _____

II. Field Conditions/Comments: _____

III. Special Instructions: _____
(Detection Limits, Data Package, etc.)

Relinquished By:	Time/Date:	Received By:	Time/Date:
[signature]	4/16/93 12:20	[signature]	4/16/93 12:20

SAMPLE RECEIPT CHECKLIST RESAMPLE

Client: ENSCI

Project Number: LP Staples

Laboratory Number: 83432-Ø

1. ___ Shipped
   ✓ Hand Delivered
   Notes: ___

2. ✓ COC Present on Receipt
   ___ No COC
   Notes: ___

3. ___ COC Tape on Shipping Container
   ✓ No COC Tape on Shipping Container
   Notes: ___

4. ___ Samples Broken/Leaking
   ✓ Sample Intact on Receipt
   ___ Other (See Notes)
   Notes: ___

5. ___ Ambient on Receipt
   ✓ Chilled on Receipt
   Notes: ___

6. ___ Samples Preserved Correctly
   ___ Improper Preservatives
   ✓ N/A (None Recommended)
   ___ Other (See Notes)
   Notes: ___

7. ✓ Received Within Holding Time
   ___ Not Received Within Holding Time
   ___ N/A (None Recommended)
   ___ Other (See Notes)
   Notes: ___

8. ___ COC Tapes on Samples
   ✓ No COC Tapes on Samples
   Notes: ___

9. ✓ Discrepancies Between COC and Sample Labels
   ___ No Discrepancies Noted
   ___ N/A (No COC Received)
   Notes: COC says samples are SB-3 and SB-4 and samples say SB-3, SB-5.

Additional Comments: ___

Inspected and Logged in by: Amy Barnett

Date/Time: 4/8/93 9:40 Pm

AnalytiKEM An American NuKEM Company

AnalytiKEM Inc.
454 S. Anderson Road, BTC 532
Rock Hill, SC 29730
803/329-9690
Fax: 803/324-3982

TEST REPORT NO. A83715

June 16, 1993

Prepared for:

ENSCI
1108 Thomasville Road
High Point, NC 27260

Attention: Chris Boggs

Project: L.P. Staples

Reviewed &
Approved by: _____

Name: Carmine M. Fioriglio

Title: QA/QC Manager

TABLE OF CONTENTS

AnalytiKE

I. Certification

AnalytiKEM, Inc.
Current Certifications/Regulatory Approvals

Tabulated below are the current laboratory certifications that are held by each AnalytiKEM Laboratory.

Cherry Hill, NJ		Rock Hill, SC		Houston Analytical, TX	
State	Cert #	State	Cert #	State	Cert #
Arkansas	*	S. Carolina	46067	N. Dakota	R-006
Connecticut	PH-0715	N. Carolina	316	Oklahoma	8403
Florida	880985G	New Jersey	79795	Texas Water Commission	*
Massachusetts	NJ117			Louisiana	92-07
New Jersey	04012			S. Carolina	82011
New York	10815			N. Carolina	367
N. Carolina	258			Wisconsin	998010530
N. Dakota	R-038			New Jersey	82869
Pennsylvania	68366				
S. Carolina	94004				
Tennessee	02908				
Vermont	*				
Oklahoma	9107				

* No certification numbers are issued for these states.

AnalytiKE

II. Definition of Terms

Term	Definition
D	Detected; result must be greater than zero.
DI	Deionized Water
J	Compound was detected at levels below the practical quantitatio limit. The level reported is approximate.
MS/MSD	Matrix Spike/Matrix Spike Duplicate.
NA	Analysis not applicable to the sample matrix.
ND	Not Detected
NR	Not Requested
NTU	Nephelometric Turbidity Units
RPD	Relative Percent Difference
RSD	Relative Standard Deviation
U	Compound was analyzed for but not detected. The preceding numb is the practical quantitation limit for the compound.
ppb	Parts-per-billion; may be converted to ppm by dividing by 1,000
ppm	Parts-per-million; may be converted to ppb by multiplying by 1,000.
ug/l	Micrograms of constituent per liter of sample; equivalent to parts-per-billion.
ug/kg	Micrograms of constituent per kilogram of sample; equivalent tc parts-per-billion.
ug/kg dw	Micrograms of constituent per kilogram of sample reported on a dry weight basis.
CCC	Calibration Check Compound; used to verify the precision of a GC/MS calibration curve.
SPCC	System Performance Check Compound; used to verify the correct operation of a GC/MS instrument.
PQL	Practical Quantitation Limit; the minimum level at which compounds can be dependably quantitated.
B	Analyte detected in associated blank as well as the sample. It indicates possible/probable blank contamination.

AnalytiKEM

III. Sample Designations

AnalytiKEM Designation	Client Designation	Matrix	Date Sampled
A83715-1	SB-3	Nonaqueous	06/07/93
A83715-2	SB-5	Nonaqueous	06/07/93
A83715-3	OWR	Aqueous	06/08/93

Note: Samples will be held for 30 days beyond the test report date unless otherwise requested.

AnalytiKE

IV. Methodology

Volatiles

Method 5030, Purge and Trap, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Method 8240, Gas Chromatography/Mass Spectrometry for Volatile Organics, Te Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Semivolatiles

Method 3510, Separatory Funnel Liquid-Liquid Extraction, Test Methods for Evaluating Solid Waste, Physical Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Method 3550, Sonication Extraction, Test Methods for Evaluating Solid Waste Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Method 8270, Gas Chromatography/Mass Spectrometry for Semivolatile Organics Capillary Column Technique, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, Third Edition, USEPA, 1986, with all promulgated revisions.

Analytil

V. Analytical Results

Volatile Organics

Parameter	Sample Designation: Method Blank	A83715-3 * OWR
Chloromethane	< 20	< 20
Bromomethane	< 20	< 20
Vinyl Chloride	< 20	< 20
Chloroethane	< 20	< 20
Methylene Chloride	< 10	< 10
1,1-Dichloroethene	< 10	< 10
1,1-Dichloroethane	< 10	< 10
1,2-Dichloroethene (total)	< 10	< 10
Chloroform	< 10	< 10
1,2-Dichloroethane	< 10	< 10
1,1,1-Trichloroethane	< 10	< 10
Carbon Tetrachloride	< 10	< 10
Bromodichloromethane	< 10	< 10
1,2-Dichloropropane	< 10	< 10
cis-1,3-Dichloropropene	< 10	< 10
Trichloroethene	< 10	< 10
Dibromochloromethane	< 10	< 10
1,1,2-Trichlorethane	< 10	< 10
Benzene	< 10	< 10
trans-1,3-Dichloropropene	< 10	< 10
2-Chloroethylvinylether	< 20	< 20
Bromoform	< 10	< 10
Tetrachloroethene	< 10	< 10
1,1,2,2-Tetrachlorethane	< 10	< 10
Toluene	< 10	31
Chlorobenzene	< 10	< 10
Ethylbenzene	< 10	22
m,p-Xylene	< 10	72
o-Xylenes	< 10	18
Units	(ug/l)	(ug/l)

* Increased detection limits due to dilution caused by high concentration of nontargeted compounds.

AnalytiKE

V. Analytical Results (Cont'd)

Semivolatile Organics (Page 1 of 2)

Parameter	Method Blank 1	A83715-1 SB-3	A83715-2 SB-5
	Sample Designation		
N-Nitrosodimethylamine	< 330	< 330	< 330
Phenol	< 330	< 330	< 330
Bis(2-chloroethyl) Ether	< 330	< 330	< 330
2-Chlorophenol	< 330	< 330	< 330
1,3-Dichlorobenzene	< 330	< 330	< 330
1,4-Dichlorobenzene	< 330	< 330	< 330
1,2-Dichlorobenzene	< 330	< 330	< 330
2-Methylphenol	< 330	< 330	< 330
Bis(2-chloroisopropyl) Ether	< 330	< 330	< 330
3+4-Methylphenol(M+P-Cresols)	< 330	< 330	< 330
N-Nitrosodipropylamine	< 330	< 330	< 330
Hexachloroethane	< 330	< 330	< 330
Nitrobenzene	< 330	< 330	< 330
Isophorone	< 330	< 330	< 330
2-Nitrophenol	< 330	< 330	< 330
2,4-Dimethylphenol	< 330	< 330	< 330
Bis(2-chloroethoxy)methane	< 330	< 330	< 330
2,4-Dichlorophenol	< 330	< 330	< 330
1,2,4-Trichlorobenzene	< 330	< 330	< 330
Naphthalene	< 330	< 330	< 330
Hexachlorobutadiene	< 330	< 330	< 330
4-Chloro-3-methylphenol	< 330	< 330	< 330
Hexachlorocyclopentadiene	< 330	< 330	< 330
2,4,6-Trichlorophenol	< 330	< 330	< 330
2-Chloronaphthalene	< 330	< 330	< 330
Dimethyl Phthalate	< 330	< 330	< 330
Acenaphthylene	< 330	< 330	< 330
Acenaphthene	< 330	< 330	< 330
2,4-Dinitrophenol	< 1,600	< 1,600	< 1,600
Units	(ug/kg)	(ug/kg)	(ug/kg)

AnalytiKi

V. Analytical Results (Cont'd)

Semivolatile Organics (Page 2 of 2)

Parameter	Method Blank 1	Sample Designation A83715-1 SB-3	A83715-2 SB-5
4-Nitrophenol	< 1,600	< 1,600	< 1,600
2,4-Dinitrotoluene	< 330	< 330	< 330
2,6-Dinitrotoluene	< 330	< 330	< 330
Diethyl Phthalate	< 330	< 330	< 330
4-Chlorophenyl Phenyl Ether	< 330	< 330	< 330
Fluorene	< 330	< 330	< 330
4,6-Dinitro-2-methylphenol	< 1,600	< 1,600	< 1,600
N-Nitrosodiphenylamine	< 330	< 330	< 330
4-Bromophenyl Phenyl Ether	< 330	< 330	< 330
Hexachlorobenzene	< 330	< 330	< 330
Pentachlorophenol	< 330	< 330	< 330
Phenanthrene	< 330	< 330	< 330
Anthracene	< 330	< 330	< 330
Di-n-butyl Phthalate	< 330	< 330	< 330
Fluoranthene	< 330	< 330	< 330
Benzidine	< 1,600	< 1,600	< 1,600
Pyrene	< 330	< 330	< 330
Butylbenzyl Phthalate	< 330	< 330	< 330
3,3'-Dichlorobenzidine	< 660	< 660	< 660
Benzo(a)anthracene	< 330	< 330	< 330
Bis(2-ethylhexyl) Phthalate	< 330	< 330	< 330
Chrysene	< 330	< 330	< 330
Di-n-octyl Phthalate	< 330	< 330	< 330
Benzo(b)fluoranthene	< 330	< 330	< 330
Benzo(k)fluoranthene	< 330	< 330	< 330
Benzo(a)pyrene	< 330	< 330	< 330
Indeno(1,2,3-cd)pyrene	< 330	< 330	< 330
Dibenzo(a,h)anthracene	< 330	< 330	< 330
Benzo(g,h,i)perylene	< 330	< 330	< 330
Units	(ug/kg)	(ug/kg)	(ug/kg)

V. Analytical Results (Cont'd)

Semivolatile Organics (Page 1 of 2)

Parameter	Sample Designation: Method Blank 2	Sample Designation: A83715-3 * OWR
N-Nitrosodimethylamine	< 10	< 100
Phenol	< 10	< 100
Bis(2-chloroethyl) Ether	< 10	< 100
2-Chlorophenol	< 10	< 100
1,3-Dichlorobenzene	< 10	< 100
1,4-Dichlorobenzene	< 10	< 100
1,2-Dichlorobenzene	< 10	< 100
2-Methylphenol	< 10	< 100
Bis(2-chloroisopropyl) Ether	< 10	< 100
3+4-Methylphenol(M+P-Cresols)	< 10	< 100
N-Nitrosodipropylamine	< 10	< 100
Hexachloroethane	< 10	< 100
Nitrobenzene	< 10	< 100
Isophorone	< 10	< 100
2-Nitrophenol	< 10	< 100
2,4-Dimethylphenol	< 10	< 100
Bis(2-chloroethoxy)methane	< 10	< 100
2,4-Dichlorophenol	< 10	< 100
1,2,4-Trichlorobenzene	< 10	< 100
Naphthalene	< 10	< 100
Hexachlorobutadiene	< 10	< 100
4-Chloro-3-methylphenol	< 10	< 100
Hexachlorocyclopentadiene	< 10	< 100
2,4,6-Trichlorophenol	< 10	< 100
2-Chloronaphthalene	< 10	< 100
Dimethyl Phthalate	< 10	< 100
Acenaphthylene	< 10	< 100
Acenaphthene	< 10	< 100
2,4-Dinitrophenol	< 50	< 500
Units	(ug/l)	(ug/l)

* Increased detection limits due to dilution caused by high concentration of nontargeted compounds.

Analyt

V. Analytical Results (Cont'd)

Semivolatile Organics (Page 2 of 2)

Parameter	Sample Designation: Method Blank 2	A83715-3 * OWR
4-Nitrophenol	< 50	< 500
2,4-Dinitrotoluene	< 10	< 100
2,6-Dinitrotoluene	< 10	< 100
Diethyl Phthalate	< 10	< 100
4-Chlorophenyl Phenyl Ether	< 10	< 100
Fluorene	< 10	< 100
4,6-Dinitro-2-methylphenol	< 50	< 500
N-Nitrosodiphenylamine	< 10	< 100
4-Bromophenyl Phenyl Ether	< 10	< 100
Hexachlorobenzene	< 10	< 100
Pentachlorophenol	< 10	< 100
Phenanthrene	< 10	< 100
Anthracene	< 10	< 100
Di-n-butyl Phthalate	< 10	< 100
Fluoranthene	< 10	< 100
Benzidine	< 50	< 500
Pyrene	< 10	< 100
Butylbenzyl Phthalate	< 10	< 100
3,3'-Dichlorobenzidine	< 20	< 200
Benzo(a)anthracene	< 10	< 100
Bis(2-ethylhexyl) Phthalate	< 10	< 100
Chrysene	< 10	< 100
Di-n-octyl Phthalate	< 10	< 100
Benzo(b)fluoranthene	< 10	< 100
Benzo(k)fluoranthene	< 10	< 100
Benzo(a)pyrene	< 10	< 100
Indeno(1,2,3-cd)pyrene	< 10	< 100
Dibenzo(a,h)anthracene	< 10	< 100
Benzo(g,h,i)perylene	< 10	< 100
Units	(ug/l)	(ug/l)

* Increased detection limits due to dilution caused by high concentration of nontargeted compounds.

Analyt

VI. Quality Control Data

Volatile Organics

Aqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A75518-EFF

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
1,1-Dichloroethene	0.25	96	98	2	79-121	10
Trichloroethene (TCE)	0.25	92	95	3	82-120	7
Chlorobenzene	0.25	93	95	2	78-118	5
Toluene	0.25	95	96	1	74-128	15
Benzene	0.25	98	99	1	70-136	8
Units	(ug)	(%)	(%)	(%)	(%)	(%)

Recovery: 0 out of 10 outside control limits

RPD: 0 out of 5 outside control limits

Analytik

VI. Quality Control Data (Cont'd)

Volatile Organics

Aqueous Surrogate Recovery Data

Sample Designation	Surrogate Recovery: 1,2-Dichloroethane-d_4 (50 ppb Added)	Toluene-d_8 (50 ppb Added)	4-Bromofluorob (50 ppb Added)
Method Blank	108	103	102
A75518-EFF Spike	96	95	95
A75518-EFF Spike Dup.	96	95	96
A83715-3	105	101	99
Units	(%)	(%)	(%)
Control Limits	87-130	74-121	71-13

__0__ out of __12__ surrogate recoveries are outside control limits.

Analyti

VI. Quality Control Data (Cont'd)

Semivolatile Organics

Nonaqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A83630-1

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
1,4-Dichlorobenzene	50	62	60	3	18-120	43
N-Nitrosodipropylamine	50	61	59	3	10-165	31
1,2,4-Trichlorobenzene	50	65	61	6	24-161	17
Acenaphthene	50	76	70	8	10-151	16
2,4-Dinitrotoluene	50	70	63	11	10-197	33
Pyrene	50	72	60	18	10-167	31
Phenol	100	61	58	5	10-141	41
2-Chlorophenol	100	61	59	3	33-101	19
4-Chloro-3-methylphenol	100	64	59	8	26-117	25
4-Nitrophenol	100	56	53	6	10-221	36
Pentachlorophenol	100	63	59	6	10-179	16
Units	(ppb)	(%)	(%)	(%)	(%)	(%)

Recovery: 0 out of 22 outside control limits

RPD: 0 out of 11 outside control limits

Analytik

VI. Quality Control Data (Cont'd)

Semivolatile Organics

Nonaqueous Surrogate Recovery Data

	Surrogate Recovery		
Sample Designation	2-Fluorophenol (200 ppb Added)	Phenol-d_5 (200 ppb Added)	2,4,6-Tribromophenc (200 ppb Added)
Method Blank 1	57	73	58
A83630-1 Spike	55	70	72
A83630-1 Spike Dup.	51	67	65
A83715-1	52	64	50
A83715-2	53	66	51
Units	(%)	(%)	(%)
Control Limits	27-106	30-88	42-89

	Surrogate Recovery		
Sample Designation	Nitrobenzene-d_5 (100 ppb Added)	2-Fluorobiphenyl (100 ppb Added)	Terphenyl-d_{14} (100 ppb Added)
Method Blank 1	90	84	89
A83630-1 Spike	79	75	77
A83630-1 Spike Dup.	74	72	64
A83715-1	76	76	72
A83715-2	79	79	77
Units	(%)	(%)	(%)
Control Limits	34-107	10-157	10-175

__0__ out of __30__ surrogate recoveries are outside control limits.

Analytik

VI. Quality Control Data (Cont'd)

Semivolatile Organics

Aqueous Matrix Spike/Matrix Spike Duplicate Recovery Data

Sample Spiked A83612-6

Parameter	Amount of Spike	Recovery MS	Recovery MSD	RPD	Control Limits Recovery	Control Limits Max. RPD
1,4-Dichlorobenzene	50	70	73	4	10-110	15
N-Nitrosodipropylamine	50	66	69	4	10-151	27
1,2,4-Trichlorobenzene	50	72	73	1	20-136	24
Acenaphthene	50	79	83	5	17-120	5
2,4-Dinitrotoluene	50	73	77	5	10-175	17
Pyrene	50	76	80	5	10-175	19
Phenol	100	32	34	6	10-130	18
2-Chlorophenol	100	68	72	6	47-106	16
4-Chloro-3-methylphenol	100	74	77	4	48-115	30
4-Nitrophenol	100	22	24	9	10-175	30
Pentachlorophenol	100	91	90	1	64-118	11
Units	(ppb)	(%)	(%)	(%)	(%)	(%)

Recovery: 0 out of 22 outside control limits

RPD: 0 out of 11 outside control limits

VI. Quality Control Data (Cont'd)

Analyt

Semivolatile Organics

Aqueous Surrogate Recovery Data

Sample Designation	Surrogate Recovery 2-Fluorophenol (100 ppb Added)	Phenol-d_5 (100 ppb Added)	2,4,6-Tribromophe (100 ppb Added)
Method Blank 2	39	31	50
A83612-6 Spike	43	35	88
A83612-6 Spike Dup.	44	37	90
A83715-3	22	24	52
Units	(%)	(%)	(%)
Control Limits	10-109	10-90	10-142

Sample Designation	Surrogate Recovery Nitrobenzene-d_5 (50 ppb Added)	2-Fluorobiphenyl (50 ppb Added)	Terphenyl-d_{14} (50 ppb Added)
Method Blank 2	64	71	75
A83612-6 Spike	63	81	77
A83612-6 Spike Dup.	64	86	83
A83715-3	38	52	63
Units	(%)	(%)	(%)
Control Limits	10-133	10-165	10-175

0 out of 24 surrogate recoveries are outside control limits.

AnalytiKEM An American NuKEM Company

03293

Chain-of-Custody Record

83715

Program Area: Drinking Water Wastewater Groundwater Solid and Hazardous Waste

Client: ENSCI Sample Collector: Boggs

Project: L.P. Staples AnalytiKEM Contact: Holly

Laboratory
2324 Vernsdale Road
Rock Hill, South Carolina 29731
(803) 324-5310
Fax: (803) 324-8378

Sales Office
454 South Anderson Road BTC 532
Rock Hill, South Carolina 29730
(803) 329-9690
Fax: (803) 329-9689

ITEM NUMBER	SAMPLE DESIGNATION	DATE	TIME	MATRIX	Grab or Composite	40 ml vials	950 ml Org. Pres.	450 ml Unpres.	ml HNO_3	ml H_2SO_4	ml NaOH	ml HCL			PARAMETERS
1	SB-3	6/7	1135	Soil	X			2							EPA 8270
2	SB-5	6/7	1245	Soil	X			2							EPA 8270
3															
4															
5															
6															
7															
8															
9															
10															

TRANSFER NUMBER	ITEM NUMBER	TRANSFERS RELINQUISHED BY	TRANSFERS ACCEPTED BY	DATE	TIME
1	1+2	[signature] Boggs	Grady Lane	6-7-93	1445
2	1+2	Grady Lane	[signature]	6-7-93	1825
3					

REMARKS

Need Results ASAP!

Resample

SAMPLER'S SIGNATURE

28 Springdale Road
Cherry Hill, New Jersey 08003
(609) 751-1122 • (215) 923-2068
Fax: (609) 751-0824

☐ 2925 Richmond Avenue
Houston, Texas 77098
(713) 520-1495
Fax: (713) 523-7107

Analysis Request and Chain-of-Custody

☐ 2324 Vernsdale Road
Rock Hill, South Carolina 29730
(803) 324-5310
Fax: (803) 324-3982

Client ENSCI Project: L.P. Staples AnalytiKEM Contact Jean

FIELD SAMPLE I.D. NO.	DATE	USE 24 HR. CLOCK TIME	MATRIX	40 ml vials	950 ml Org. Pres.	950 ml Unpres.	ml Unpres.	ml HNO_3	ml H_2SO_4	ml H_2SO_4	ml NaOH			ANALYSIS REQUESTED PARAMETERS
OWR	6/8	1415	Aq	8		2x								Priority Pollutant VOA + SVOA

(one 950 crossed with the top off (will not use for analysis) 6/8/93 1813)

Field Measurements:

Data Sheets: Y N

Filtered: Y Not Required

Chain of Custody

Seal No.

II. Field Conditions/Comments:

III. Special Instructions: Resample Need Results ASAP! # 83432
(Detection Limits, Data Package, etc.)

Relinquished By:	Date/Time (use 24 hr. clock)	Received By:	Date/Time (use 24 hr. clock)
Print Name: Chris Boggs	6/8/93 1457	Print Name: Jean Neal	6/8/93 1635
Signature: Chris Boggs		Signature: Jean Neal	6/8/93

Appendix B

Letter Explaining Methylene Chloride Detections

AnalytiKEM An American NuKEM Company

AnalytiKEM Inc.
454 S. Anderson Road, BTC 532
Rock Hill, SC 29730
803/329-9690
Fax: 803/324-3982

June 8, 1993

Chris Boggs
ENSCI
1108 Thomasville Road
High Point, NC 27260

Dear Mr. Boggs:

As per your conversation with Jean Neal and Holly Glasscock, AnalytiKEM is forwarding you a letter addressing the issue of methylene chloride in the samples analyzed for your LP Staples project, AnalytiKEM report A83432. Methylene chloride is a common laboratory solvent and frequently appears in environmental samples analyzed for volatile organic compounds. This fact is recognized by most regulatory agencies and samples with methylene chloride contamination up to five times the reported detection limit is common.

It is AnalytiKEM's opinion that the levels of methylene chloride found were the result of laboratory contamination. If you require more information regarding this or any other project please feel free to call me at your convenience.

Sincerely,

Gerold J. Miller, Ph.D.
Corporate Quality Control Manager

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JAYGEE REALTY CO., a New York General Partnership; EFBE REALTY CO., a New York General Partnership; SEYMOUR FILMAN; MYRON BELFER; ABNER ROSEN; and JONATHAN ROSEN, Plaintiffs, v. ROBERT J. COULTER; VIRGINIA COULTER; DAVID E. GREENE; SHEILA G. GREENE; ROBERT P. KASSING; STAPLES, an Indiana Limited Partnership; and STAPLES, INC.	)	Cause No. IP 92-948-C

CONSENT ORDER

It appearing to the court that counsel for plaintiffs and defendants have consented to the entry of an order allowing plaintiffs to substitute their second amended complaint for their amended complaint; it is now, therefore,

ORDERED, that plaintiffs' second amended complaint be, and the same thereby is, substituted for their amended complaint. Defendants shall have 30 days from and after the date hereof within which to answer or otherwise plead to the second amended complaint.

The 28 day of June, 1993.

/s/
United States Magistrate Judge

CONSENTED TO:

Attorney for Plaintiffs
Norman B. Smith
Smith, Follin & James
PO Box 990
Greensboro, NC 27402
(919) 274-2992
NCSB 4962

Attorney for Plaintiffs
Donald G. Orzeske
Osborn Hiner & Lisher
Suite 380, One Woodfield
8330 Woodfield Crossing Blvd.
Indianapolis, IN 46240

Attorney for Defendants
Terrill D. Albright
Baker and Daniels
300 N. Meridian Street, #2700
Indianapolis, IN 46204

Coulter & Greene

Attorney for Defendants
Evan E. Steger
Ice Miller Donadio and Ryan
One American Square
Box 82001
Indianapolis, Indiana 46282

Phase II Site Assessment Proposal

105 Ragsdale Road
Jamestown, North Carolina
October 3, 1994
ENSCI Proposal #P94-502

Prepared for

Dr. Seymour Filman

ENSCI Engineering Group, P.A.
1108 Old Thomasville Road
High Point, North Carolina 27260
(910) 883-7505

Introduction

ENSCI Engineering Group, P.A. is pleased to submit this proposal for additional assessment of the facility located at 105 Ragsdale Road, Jamestown, North Carolina.

Scope of Work

In order to comply with federal and state regulatory guidelines and your need for additional assessment of the property, ENSCI has developed the following scope of work:

- Screening soil samples using Organic Vapor Analyzer (OVA)
- Installing three Type II groundwater monitoring wells
- Performing field measurement of aquifer parameters
- Collecting groundwater samples for laboratory analysis
- Interpreting data and reporting findings and recommendations.

Soil Screening

During monitoring well installation, ENSCI will collect soil samples and screen them using an organic vapor analyzer (OVA). In the event that OVA readings indicate the potential presence of volatile organic compounds, ENSCI will send a sample(s) to a certified laboratory for analysis using EPA method 8240 for $325/sample. This cost is not included in the table below.

Monitoring Well Installation and Flow Direction Calculation

Three Type II (shallow) monitoring wells will be installed in 25-foot soil borings. The wells will consist of 2-inch diameter Schedule 40 PVC pipe with flush-threaded joints. The bottom section of PVC pipe will consist of manufactured well screen with 0.010-inch wide slots. The well screen will be placed so that the static water level is within the screened section.

After the well casing is installed, washed sand will be placed around the casing to at least 2 feet above the top of the well screen section. The sand backfill will stabilize the well casing and help yield a less turbid groundwater sample. A bentonite seal (a minimum of 1 foot thick) will be installed on top of the sand backfill to seal the well. The remainder of the well boring outside the pipe will be grouted with portland cement to grade (ground

surface). A lockable, flush-mounted steel protective cover will be placed over each monitoring well.

Groundwater flow direction will be calculated using field measurements collected by an onsite geologist. Flow direction will be calculated by surveying the tops of the well casings relative to a benchmark elevation, measuring the depth to the static water table in each well, calculating the relative water table elevations, and inputting all values to a software system designed to determine the water table gradient and flow direction.

Groundwater Sampling and Analysis

In preparation for sampling, the measured water level values will be used in conjunction with the total casing depth to determine the height of the water column and the volume of water standing in the well. The well will be purged by removing at least three times the volume of water within the well, or as required by state guidelines. Water which is purged from the wells will be drummed for future disposal. Disposal costs are not included in this scope of work.

Groundwater samples will be collected from the monitoring wells using Teflon bailers. The samples will be placed into laboratory glass containers with Teflon lids, appropriately preserved, and shipped to an approved laboratory for chemical analysis.

Report Preparation

Upon the receipt of laboratory results, a report will be prepared which will document site activities and observations, draw conclusions from the available data, and present recommendations for further action, if any. The document will contain complete records of field and laboratory data and will meet federal and state reporting requirements.

Project Schedule

ENSCI will begin field activities on a date which is agreed upon by both parties. The field activities which are outlined above will be completed within approximately 10 days after their initiation. The written report will follow approximately two weeks after all laboratory results have been received.

Costs

The extensions and estimated total exhibited below are approximations based on estimated units as illustrated. Actual costs will be billed on a time and materials basis according to the unit costs.

Description	Unit Cost	Estimated Units	Extension
Labor - Field Activities			
Project Manager	$65/hour	2 hours	$130
Geologist	$55/hour	10 hours	$550
Environmental Technician	$40/hour	10 hours	$400
Monitoring Well Installation			
Mobilization	Lump Sum		$350
OVA	$100/day	1 day	$100
Well Construction	$40/foot	75 total feet	$3,000
Steam Jenny	$75/day	1 day	$75
17-H 55-Gallon Drums	$35/drum	1 drum	$35
Groundwater Analysis			
EPA Method 8240	$325/sample	3 samples	$975
Report Preparation			
Project Geologist	$55/hour	20 hours	$1,100
Project Manager	$65/hour	4 hours	$260
Draftsman	$45/hour	4 hours	$180
Clerical	$29/hour	2 hours	$58
Estimated Total			$7,213

Limitations

This quotation is subject to the following conditions:

- Unit costs are effective for 30 days from the date of this proposal.

Acceptance

In order to accept this proposal, please complete the enclosed service agreement and return it to our office or fax to (910) 882-7958.

MAIL TO Whitley & Washington, Attorneys, P.O. Box 560, High Point, N. C. 27261

(Address) (Street & Number) (City) (State) (Zip)

This Deed, Made this 19 day of December, in 67, by and between R.E.Powers and wife Gloria Powers; R.E.Powers and wife Mary Louise Powers of Guilford County and State of North Carolina, hereinafter called Grantor, and Powers Wire Products Co., Inc., a California Corporation hereinafter called Grantee.

WITNESSETH: That the Grantor, for and in consideration of the sum of Ten Dollars and other good and valuable considerations to him in hand paid by the Grantee, the receipt whereof is hereby acknowledged, has given, granted, bargained, sold and conveyed, and by these presents do give, grant, bargain, sell, convey and confirm unto the Grantee, his heirs and or successors and assigns, premises in Jamestown Township, Guilford County, North Carolina, described as follows:

BEGINNING at an iron pin in the eastern right of way line of Ragsdale Road, said iron pin being located North 24° 45' 30" East 275 feet from a new iron pin in the river bank of Deep River, in the Town of Jamestown, and running thence along said right of way line of Ragsdale Road, North 24° 45' 30" East 412.55 feet (crossing the southern right of way line of the Southern Railroad) to a new iron pin in the center line of the old northbound track of the Southern Railroad; and running thence North 61° 15' 30" East along the center line of the old northbound track of the Southern Railroad, 156.76 feet to an existing Tee iron; and running thence along the Union Bag Camp Paper Corporation line South 23° 02' East 568.92 feet (crossing the southern right of way line of the Southern Railroad) to an existing concrete monument; running thence along the W. C. Ragsdale line South 52° 11' 20" West 245.54 feet to an existing iron pin; thence continuing along the W. C. Ragsdale line South 52° 11' 20" West 17.93 feet to an iron pin; thence North 54° 06' 10" West 400.76 feet to the point and place of beginning; as per map designated as "Propetty of W. C. Ragsdale Estate" dated August 18, 1966, revised October 26, 1964, and March 15, 1966, by Southern Mapping and Engineering Co., Greensboro, North Carolina, Job No. A-173-66."

255582

555:127 441 =00007.00 DD

555:127 441 =00000.25 FE

The above land was conveyed to Grantor by Mary R. Strickland et al et vir See Book No. 2283 Page 601

TO HAVE AND TO HOLD The above described premises, with all the appurtenances thereunto belonging, or in any wise appertaining, unto the Grantee, his heirs and or successors and assigns forever.

And the Grantor covenants that he is seized of said premises in fee, and has the right to convey the same in fee simple; that said premises are free from encumbrances (with the exceptions above stated, if any); and that he will warrant and defend the said title to the same against the lawful claims of all persons whomsoever.

When reference is made to the Grantor or Grantee, the singular shall include the plural and the masculine shall include the feminine or the neuter.

IN WITNESS WHEREOF, The Grantor has hereunto set his hand and seal, the day and year first above written.

R. E. Powers (SEAL) Gloria Powers (SEAL)

STATE OF NORTH CAROLINA CALIFORNIA - Los Angeles County

I, Joe T. Noe a Notary Public of said County, do hereby certify that R. E. Powers and wife Gloria Powers

Grantor, personally appeared before me this day and acknowledged the execution of the foregoing deed.

Witness my hand and notarial seal, this the 19th day of December

My Commission Expires: Joe T. Noe

STATE OF NORTH CAROLINA CALIFORNIA - Los Angeles County

I, Joe T. Noe a Notary Public of said County, do hereby certify that R. E. Powers and wife Mary Louise Powers

Grantor, personally appeared before me this day and acknowledged the execution of the foregoing deed.

Witness my hand and notarial seal, this the 19th day of December

My Commission Expires: JOE T. NOE Joe T. Noe

My Commission Expires June 5, 1968

STATE OF NORTH CAROLINA - GUILFORD COUNTY

The foregoing certificate of Joe T. Noe, N.P. of Los Angeles Co. Calif. are certified to be correct. This APR 12 1968

Mark Stewart, Register of Deeds, Guilford County, N. C.

Recording Fee paid

Probate Fee (if) paid By Mary Belle Atkins Deputy Register of Deeds

This Deed drawn by Whitley and Washington, P. O. Box 569, High Point, North Carolina

PRESENTED FOR REGISTRATION AND RECORDED

APR 12 2 49 PM '68

MARK STEWART REGISTER OF DEEDS GUILFORD COUNTY, N.C.

BK 2368 PG 665

NORTH CAROLINA

GUILFORD COUNTY

THIS DEED, Made this 20th day of June, 1966, by and between MARY R. STRICKLAND and husband, SAMUEL H. STRICKLAND, LUCY R. HEILIG (WIDOW), VIRGINIA R. COX and husband, JOSEPH J. COX, WILLIAM C. RAGSDALE, JR. and wife, MARY E. RAGSDALE, EMILY RAGSDALE (SINGLE), and THOMAS C. RAGSDALE and wife, MARGARET H. RAGSDALE, of Guilford County and State of North Carolina, hereinafter called Grantors, and M. E. POWERS and R. E. POWERS, of Los Angeles County, and State of California, hereinafter called Grantees.

W I T N E S S E T H :

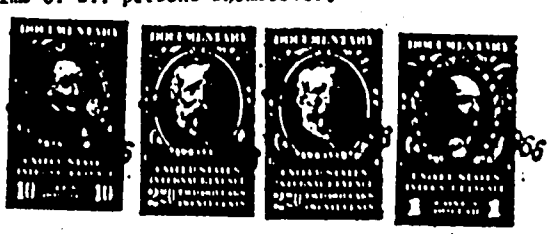
That the Grantors, for and in consideration of the sum of Ten ($10.00) Dollars and other good and valuable considerations to them in hand paid by the Grantees, the receipt whereof is hereby acknowledged, have given, granted, bargained, sold and conveyed, and by these presents do give, grant, bargain, sell, convey and confirm unto the Grantees, their heirs and/or successors and assigns, premises in Jamestown Township, Guilford County, North Carolina, described as follows:

BEGINNING at an iron pin in the eastern right of way line of Ragsdale Road, said iron pin being located North 24° 45' 30" East 27' feet from a new iron pin in the river bank of Deep River, in the Town of Jamestown, and running thence along said right of way line of Ragsdale Road, North 24° 45' 30" East 412.75 feet (crossing the southern right of way line of the Southern Railroad) to a new iron pin in the center line of the old northbound track of the Southern Railroad; and running thence North 61° 15' 30" East along the center line of the old northbound track of the Southern Railroad, 156.76 feet to an existing Tee iron; and running thence along the Union Bag Camp Paper Corporation line South 23° 02' East 968.9' feet (crossing the southern right of way line of the Southern Railroad) to an existing concrete monument; running thence along the W. G. Ragsdale line South 52° 11' 20" West 245.54 feet to an existing iron pin; thence continuing along the W. G. Ragsdale line South 52° 11' 20" West 17.93 feet to an iron pin; thence North 24° 06' 10" West 400.76 feet to the point and place of beginning; as per map designated as "Property of W. G. Ragsdale Estate" dated August 18, 1964, revised October 26, 1965, and March 15, 1966, by Southern Mapping and Engineering Co., Greensboro, North Carolina, Job No. A-17-64.

TO HAVE AND TO HOLD the above described premises, with all the appurtenances thereunto belonging, or in any wise appertaining, unto the Grantees, their heirs and/or successors and assigns forever.

And the Grantors covenant that they are seized of said premises in fee, and have the right to convey the same in fee simple; that said premises are free from encumbrances (with the exceptions above stated, if any); and that they will warrant and defend the said title to the same against the lawful claims of all persons whomsoever.

MARTIN WHITLEY AND WASHINGTON LAW OFFICES HIGH POINT, N. C.



C# 0211262

NAME CHANGED FROM: POWER-LINE SALES, INC. TO POWER LINE FASTENING SYSTEMS, INC. ON 11-19-80. WHICH WAS THEN CHANGED

TO: FASTENING LIQUIDATION, INC.

ON: 6-30-86.

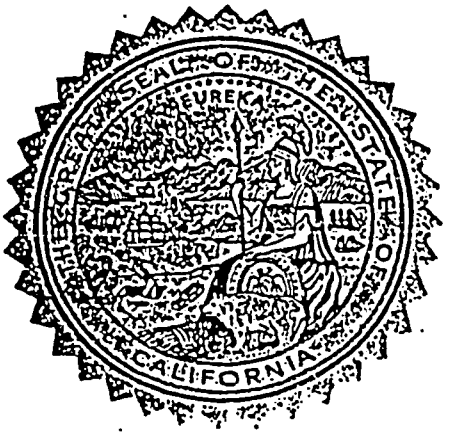
State of California
OFFICE OF THE SECRETARY OF STATE

I, *MARCH FONG EU*, Secretary of State of the State of California, hereby certify:

That the annexed transcript has been compared with the record on file in this office, of which it purports to be a copy, and that same is full, true and correct.

IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this

NOV 19 1980



March Fong Eu

Secretary of State

CERTIFICATE OF AMENDMENT

OF

ARTICLES OF INCORPORATION

ENDORSED
FILED.
In the office of the Secretary of State
of the State of California
NOV 19 1980
MARCH FONG EU, Secretary of State
By BILL HOLDEN
Deputy

Frank B. Nance and William M. McPherson certify that:

1. They are the president and the secretary, respectively, of Power-Line Sales, Inc., a California corporation.

2. Article I of the articles of incorporation of this corporation is amended to read as follows:

"The name of this corporation is Power Line Fastening Systems, Inc."

3. The foregoing amendment of articles of incorporation has been duly approved by the board of directors.

4. The foregoing amendment of articles of incorporation has been duly approved by the required vote of shareholders in accordance with Section 902 of the Corporations Code. The total number of outstanding shares of the corporation is 39,600 of Class B shares, 450,000 of Class A shares and the number of shares voting in favor of the amendment equaled or exceeded the vote required. The percentage vote required was more than 50% of the Class B shares.

Frank B. Nance, President

William M. McPherson, Secretary

BK3268 PG1022

The undersigned declare under penalty of perjury that the matters set forth in the foregoing certificate are true of their own knowledge. Executed at El Monte, California on October 28, 1980.

Frank B. Nance

William M. McPherson

BK 3268 PG 1023
1023

86-351716

State of California
March Fong Eu
Secretary of State

P.O. Box 2830
Sacramento, CA 95812
Phone: (916) 445-2020

STATEMENT BY DOMESTIC STOCK CORPORATION

(THIS STATEMENT MUST BE FILED WITH CALIFORNIA SECRETARY OF STATE (SEC. 1502, CORPORATIONS CODE))

FILED
[illegible] CALIF
Oct 1 '86
[illegible]

WHEN COMPLETING FORM, PLEASE USE BLACK TYPEWRITER RIBBON OR BLACK INK

1. 2112020 DUE DATE 11-30-86 11775S

FASTENING LIQUIDATION, INC.
10180 E. VALLEY BLVD.
EL MONTE, CA 91734

DO NOT ALTER PREPRINTED NAME. IF ITEM NO. 1 IS BLANK, PLEASE ENTER CORPORATE NAME

DO NOT WRITE IN THIS SPACE

2. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE 10180 E. VALLEY BLVD	ROOM NO.	2A. CITY & STATE EL MONTE CA	2B. ZIP CODE 91731
3. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA (IF ANY) /	ROOM NO.	3A. CITY CA	3B. ZIP CODE
4. MAILING ADDRESS 10180 E. VALLEY BLVD	ROOM NO.	4A. CITY & STATE EL MONTE CA	4B. ZIP CODE 91731

5. CHIEF EXECUTIVE OFFICER F B. NANCE	5A. BUSINESS OR RESIDENCE ADDRESS 10180 E. VALLEY BLVD	5B. CITY & STATE EL MONTE CA	5C. ZIP CODE 91731
6. SECRETARY WM MCPHERSON	6A. BUSINESS OR RESIDENCE ADDRESS 10180 E. VALLEY BLVD	6B. CITY & STATE EL MONTE CA	6C. ZIP CODE 91731
7. CHIEF FINANCIAL OFFICER WM. MCPHERSON	7A. BUSINESS OR RESIDENCE ADDRESS 10180 E VALLEY BLVD	7B. CITY & STATE EL MONTE CA	7C. ZIP CODE 91731

8. NAME F B. NANCE GEORGE A ROBERTS	8A. BUSINESS OR RESIDENCE ADDRESS 10180 E. VALLEY BLVD	8B. CITY & STATE EL MONTE CA	8C. ZIP CODE 91731
9. NAME ROBERT J MACDONNELL	9A. BUSINESS OR RESIDENCE ADDRESS SAME	9B. CITY & STATE	9C. ZIP CODE
10. NAME JEROME KOHLBERG JR	10A. BUSINESS OR RESIDENCE ADDRESS SAME	10B. CITY & STATE	10C. ZIP CODE

11. THE NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY:

12. NAME WM. MCPHERSON

13. CALIFORNIA BUSINESS OR RESIDENCE ADDRESS IF AGENT IS AN INDIVIDUAL (DO NOT USE P.O. BOX) DO NOT INCLUDE ADDRESS IF AGENT IS A CORPORATION
10180 E. VALLEY BLVD EL MONTE CA 91731

14. DESCRIBE TYPE OF BUSINESS OF THE CORPORATION
[illegible]

15. I DECLARE THAT I HAVE EXAMINED THIS STATEMENT AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IT IS TRUE, CORRECT AND COMPLETE

WM MCPHERSON — TYPE OR PRINT NAME OF SIGNING OFFICER OR AGENT
[signature] — SIGNATURE
[illegible] — DATE

16. I DECLARE THERE HAS BEEN NO CHANGE IN THE INFORMATION CONTAINED IN THE LAST STATEMENT OF THE CORPORATION WHICH IS ON FILE IN THE SECRETARY OF STATE'S OFFICE. DO NOT ATTACH AN OFFICIAL SEAL (READ INSTRUCTIONS BEFORE COMPLETING THIS ITEM)

[ ] (CHECK HERE)

TYPE OR PRINT NAME OF SIGNING OFFICER OR AGENT — SIGNATURE — DATE

12

83 9704

10-700 (REV 7-83)

01/21/94 SSCPS27 STATUS INQUIRY PAGE 1 08:08:37
CPOISTA3

NAME FASTENING LIQUIDATION, INC.

NAME CHANGED FROM POWER LINE FASTENING SYSTEMS, INC. ON 06/30/1986

CORP NO C0211262 INC. DATE 11/04/1946 STATUS DISSOLVED 12/30/1986
DOMESTIC STOCK CLASS
NO OF PAGES 00 ST/CTRY

STMNT/OFFICERS LAST COMPLETE C DATE 10/01/86 NO 0397718
COMPL/NC C DATE 09/23/85 NO 0372914
OFFICERS CERT EXEMPTION CODE DATE NO A/P

PRINCIPAL EXECUTIVE ADDR

CITY/ST/CNTRY

ZIP

CALIFORNIA ADDRESS

CITY CA

MAILING ADDRESS
10180 E VALLEY BLVD

CITY/ST/CNTRY EL MONTE CALIFORNIA
ZIP 91731

PRES NAME F B NANCE
ADDRESS 10180 E VALLEY BLVD

CITY/ST/CNTRY EL MONTE CA
ZIP 91731

AGENT NAME W M MC PHERSON
ADDRESS 10180 E VALLEY BLVD

CITY EL MONTE CA 91731

TYPE OF BUSINESS
ENTR=CONTINUE PF2=HISTORY PF3=BACK TO WORKSCREEN PF10=MAIN MENU

p/w whitley

STATE OF NORTH CAROLINA Real Estate Excise Tax
GUILFORD COUNTY 17355 JUN30'86 P.B.10471 980.00

188472

RECORDED
KAY H. PATSEAVOURAS
REGISTER OF DEEDS
GUILFORD COUNTY NC
JUN 30 1 44 PM '86

980-

Excise Tax | Recording Time, Book and Page

Tax Lot No. ... Parcel Identifier No. ... 06/30/86
Verified by ... County on the ... 1 DEED ... 188472 ... 194.00
by ... 2 DEEDS ADDN PAGE(S) ... 3.00
1 PROBATE FEE 1.00

Mail after recording to Thomas S. Stukes, P. O. Box 21927, Greensboro, NC 27420

This instrument was prepared by Thomas S. Stukes, Atty.

Brief description for the Index

NORTH CAROLINA GENERAL WARRANTY DEED

THIS DEED made this 31st day of May, 1986, by and between

GRANTOR	GRANTEE
Power-Line Fastening Systems, Inc. (formerly Power Line Sales, Inc.), a California corporation 10180 East Valley Boulevard El Monte, California 91731	Spenax Corporation, an Indiana corporation 860 Elston Drive Shelbyville, Indiana 46176
	1 EXCISE TAX STAMP 980.00

Enter in appropriate block for each party: name, address, and, if appropriate, character of entity, e.g. corporation or partnership.

The designation Grantor and Grantee as used herein shall include said parties, their heirs, successors, and assigns, and shall include singular, plural, masculine, feminine or neuter as required by context.

WITNESSETH, that the Grantor, for a valuable consideration paid by the Grantee, the receipt of which is hereby acknowledged, has and by these presents does grant, bargain, sell and convey unto the Grantee in fee simple, all that certain lot or parcel of land situated in the City of Jamestown ... Township, Guilford County, North Carolina and more particularly described as follows:

See Exhibit A attached hereto.

BK3512PG1916

EXHIBIT A

BEGINNING at an iron pin in the eastern margin of Ragsdale Road, which iron pin is located 8 feet 6 inches from the eastern edge of the pavement of said road and also located South 24 deg. 46' 59" West 652.55 feet from the southern edge of the pavement of U.S. 29A - 70A in the Town of Jamestown, North Carolina, and running thence along the margin of said road, crossing the Southern Railway right-of-way line, North 24 deg. 46'59" East 412.55 feet to an existing iron stake 15 feet from the existing Southern Railway track; thence North 61 deg. 17' 25" East 156.65 feet to an existing iron stake; thence along the line of Union Camp Paper Corporation, and crossing the Southern Railway right-of-way line South 23 deg. 00' 05" East 568.92 feet to an iron pin; thence South 52 deg. 10' 45" W 263.46 feet to an existing iron pin; thence along the line of W. G. Ragsdale North 54 deg. 03' 11" West 400.39 feet to the point and place of Beginning, containing 4.656 acres more or less, as per map designated as Property of Power-Line Sales, Inc., prepared by Davis-Martin & Associates, Inc., Engineers, dated October 17, 1975, Revised November 7, 1975, Revised January 25, 1983, Job No. S-9973.

The above property is subject to an easement and right of way for ingress, egress and regress over, across and through the above described property, which easement is described as follows: BEGINNING at an iron pin, the northeast corner of that property conveyed to Powers Wire Products, Co., Inc. (now Power Line Fastening Systems, Inc.) by deed recorded in Book 2366, at Page 665, and also being a corner of Union Camp Paper Corp., said iron pin also being South 23 deg. 00' 05" East 568.92 feet from an iron pin which is 15 feet east of the existing Souther Railway track; running thence along the line of Union Camp Paper Corp. North 23 deg. 00' 05" West 448.92 feet to a point in the south line of that easement described in Book 2134, at Page 741; running thence along the south side of that easement described in Book 2134, at Page 741 South 61 deg. 17' 25" West 40.20 feet to a point on the south side of said easement described in Book 2134, at Page 741; running thence South 23 deg. 00' 05" East 455.50 feet to a point in the east line of that tract of land conveyed to Powers Wire Products Co., Inc., (now Power Line Fastening Systems, Inc.) by deed recorded in Book 2366, at Page 665; running thence North 52 deg. 10' 45" East 41.38 feet to the point and place of BEGINNING. The same being a 40 foot easement along the north line of that property described in Book 2366, at Page 665.

Prepared by Edward L Post Esq
& Mail To PO Box 2756
High Point NC
27261

Pick Up
Ed Post

249115

$1500.00

SPECIAL CORPORATION WARRANTY DEED

Grantee's address: 40 East 69th Street
New York, NY 10021
Attn: A. A. Rosen

This Special Corporation Warranty Deed made as of this 28th day of April, 1987 by and between Spenax Corporation, an Indiana corporation, hereinafter called Grantor, and Jaygee Realty Co. and Elbo Realty Co., New York partnership hereinafter called Grantee.

04/30/87
1 DEEDS 249115 4.00

WITNESSETH, that the Grantor, for and in consideration of Ten Dollars and other good and valuable consideration to it in hand paid by the Grantee, the receipt hereof is hereby acknowledged, hereby conveys and specially warrants unto the Grantee, his heirs and/or successors and assigns, the real estate described in the attached Exhibit A, incorporated herein by reference.

4 DEEDS ADDN PAGE(S) 6.00

The warranty of title by Grantor is limited to a warranty against the acts of Grantor and those claiming by, through, or under Grantor and not otherwise, and such warranty is subject to the following exceptions:

1 PROBATE FEE 1.00

1. Real estate taxes not yet due and payable.

1 EXCISE TAX STAMP 1500.00

2. All easements, encumbrances, restrictions, encroachments, rights-of-way, and covenants of record.

3. Anything which would have been disclosed by an accurate survey of the property.

Real Estate Excise Tax 1500.00
STATE OF NORTH CAROLINA APR30'87

The undersigned persons executing this deed on behalf of Grantor represent and certify that they are duly elected officers of Grantor and have been fully empowered, by proper resolution of the Board of Directors of Grantor, to execute and deliver this deed; that Grantor has full corporate capacity to convey the real estate described herein; and that all necessary corporate action for the making of such conveyance has been taken and done.

The above land was conveyed to Grantor by Warranty Deed. See Instrument No. 188472, Book 3512, Page 1916.

IN WITNESS WHEREOF, the Grantor has caused this deed to be executed by its duly authorized officers and its seal to be hereunto affixed, the day and year first above written.

SPENAX CORPORATION, an
Indiana corporation

By _____
David E. Greene
Vice President

ATTEST:

_____
Robert A. Kassing
Assistant Secretary

STATE OF NORTH CAROLINA Real Estate Excise Tax APR30'87 501.00

BK3582PG1870

REAL ESTATE DESCRIPTION

BEGINNING at an iron pin in the eastern margin of Ragsdale Road, which iron pin is located 8 feet 6 inches from the eastern edge of the pavement of said road and also located South 24 deg. 46' 59" West 652.55 feet from the southern edge of the pavement of U.S. 29A - 70A in the Town of Jamestown, North Carolina, and running thence along the margin of said road, crossing the Southern Railway right-of-way line, North 24 deg. 46'59" East 412.55 feet to an existing iron stake 15 feet from the existing Southern Railway track; thence North 61 deg. 17' 25" East 156.65 feet to an existing iron stake; thence along the line of Union Camp Paper Corporation, and crossing the Southern Railway right-of-way line South 23 deg. 00' 05" East 568.92 feet to an iron pin; thence South 52 deg. 10' 45" W 263.46 feet to an existing iron pin; thence along the line of W. G. Ragsdale North 54 deg. 03' 11" West 400.39 feet to the point and place of Beginning, containing 4.656 acres more or less, as per map designated as Property of Power-Line Sales, Inc., prepared by Davis-Martin & Associates, Inc., Engineers, dated October 17, 1975, Revised November 7, 1975, Revised January 25, 1983, Job No. S-9973.

The above property is subject to an easement and right of way for ingress, egress and regress over, across and through the above described property, which easement is described as follows: BEGINNING at an iron pin, the northeast corner of that property conveyed to Powers Wire Products, Co., Inc. (now Power-Line Fastening Systems, Inc.) by deed recorded in Book 2366, at Page 665, and also being a corner of Union Camp Paper Corp., said iron pin also being South 23 deg. 00' 05" East 568.92 feet from an iron pin which is 15 feet east of the existing Souther Railway track; running thence along the line of Union Camp Paper Corp. North 23 deg. 00' 05" West 448.92 feet to a point in the south line of that easement described in Book 2134, at Page 741; running thence along the south side of that easement described in Book 2134, at Page 741 South 61 deg. 17' 25" West 40.20 feet to a point on the south side of said easement described in Book 2134, at Page 741; running thence South 23 deg. 00' 05" East 455.50 feet to a point in the east line of that tract of land conveyed to Powers Wire Products Co., Inc., (now Power Line Fastening Systems, Inc.) by deed recorded in Book 2366, at Page 665; running thence North 52 deg. 10' 45" East 41.38 feet to the point and place of BEGINNING. The same being a 40 foot easement along the north line of that property described in Book 2366, at Page 665.

BK3582PG1872

Exhibit A

FILED
U.S. DISTRICT COURT
INDIANAPOLIS DIVISION

JAN 15 1993

SOUTHERN DISTRICT OF INDIANA
JOHN A. O'NEAL
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JAYGEE REALTY CO., a New York General Partnership, and EFBE REALTY CO., a New York General Partnership,

Plaintiffs,

v.

ROBERT J. COULTER; VIRGINIA COULTER; DAVID E. GREENE; SHEILA G. GREENE; ROBERT P. KASSING; STAPLES, an Indiana Limited Partnership, and STAPLES, INC.

Cause No. IP 92-948-C

AMENDED COMPLAINT

Plaintiffs, complaining of defendants, allege and say:

1. Plaintiffs are general partnerships organized and existing under the laws of the state of New York.

2. Defendants Robert J. Coulter and Virginia Coulter are husband and wife and are citizens and residents of Shelby County, Indiana.

3. Defendants David E. Greene and Sheila G. Greene are husband and wife and are citizens and residents of Shelby County, Indiana.

4. Defendant Robert P. Kassing is a citizen and resident of Marion County, Indiana.

5. Defendant Staples is a limited partnership organized and existing under the laws of the state of Indiana.

6. Defendant Staples, Inc., is a corporation organized and existing under the laws of the state of Indiana.

7. Jurisdiction of this action is founded upon 28 U.S.C. § 1331 and 28 U.S.C. § 1441, together with 28 U.S.C. § 1367(a) and 28 U.S.C. § 1441(c). This action was commenced in the Superior Court of Guilford County, North Carolina, by plaintiffs, but was removed by defendants to the United States District Court for the Middle District of North Carolina, from whence it was transferred to this court.

8. On or about April 27, 1987, plaintiffs entered into a lease agreement with Spenax Corporation, for lease by plaintiffs to Spenax Corporation of a manufacturing and warehouse facility located in Jamestown, Guilford County, North Carolina. The lease agreement was for a term of ten years and provided for monthly rental payments in the amount of $14,250.00, to be increased to $16,500.00 per month at the beginning of the sixth year of the lease. The lessee agreed in the lease agreement to pay for all taxes, insurance, repairs, maintenance, and all other operating expenses of the leased property. The agreement provided that the lease would be governed by the laws of the state of North Carolina.

9. Spenax Corporation purportedly assigned all of its rights under the lease agreement to the limited partnership Staples on or about December 30, 1988. Thereafter, Staples or its assignee continued making lease payments to plaintiffs to and including the payment due for the month of February, 1991.

10. At all material times, defendants Robert J. Coulter and David E. Greene have been the sole shareholders of Spenax Corporation.

11. At all material times, defendant Staples, Inc., has been the nominal general partner of the limited partnership Staples.

12. At all material times, defendants Robert J. Coulter and David E. Greene, although nominally limited partners of the limited partnership Staples, have acted as general manager and assistant general manager, respectively, of that partnership, have held themselves out as managing partners, and have been reasonably perceived by plaintiffs to be the general partners of that partnership.

13. At all material times, defendant Robert P. Kassing, dominated, controlled, and manipulated the affairs of defendant Staples, Inc., so that this nominal corporation was in reality an extension of his own personality and his alter ego.

FIRST CAUSE OF ACTION FOR FRAUD

14. Plaintiffs reallege all of the allegations contained in paragraphs 1 through 13 hereof, as fully as if again set forth herein.

15. Defendants Robert J. Coulter, David E. Greene, and Robert P. Kassing caused Spenax Corporation to adopt a plan of liquidation under Indiana law on or about December 7, 1988.

16. No notice whatever was given to plaintiffs, any persons acting on their behalf, or the general public of the plan of liquidation of Spenax Corporation and its impending dissolution, even though defendants had actual knowledge at all times of plaintiffs' names and addresses, and full details of their rightful claims against Spenax Corporation.

17. The only notice that defendants gave of liquidation and dissolution of Spenax Corporation was by means of a legal advertisement in The Shelbyville News, which publication was calculated not to be likely to come to the attention of plaintiffs, persons acting on behalf of plaintiffs, and the general public.

18. Defendants Robert J. Coulter, David E. Greene, and Robert P. Kassing were the recipients and distributees of all of the assets of Spenax Corporation, including $1,147,266 distributed to defendant Coulter, $764,844 distributed to defendant Greene, and approximately $200,000 in legal fees and other payments made to defendant Kassing and his firm.

19. The lease agreement between plaintiffs and Spenax Corporation provided in paragraph 10(d), that the lessee's dissolution or other termination of its corporate charter constituted a default of the lease agreement, for which plaintiffs were entitled a remedy.

20. The agreement between Spenax Corporation and Staples for the transfer of assets including the lease of plaintiffs' real estate, contained the provision that Staples was not assuming any liabilities or obligations of Spenax Corporation under the lease agreement with plaintiffs.

21. The liquidation and dissolution of Spenax Corporation and the agreement that Staples was not assuming liabilities under the lease were existing facts as of the time they occurred.

22. The liquidation and dissolution of Spenax Corporation and the agreement that Staples was not assuming liabilities under the

lease were facts material to plaintiffs, in that had they known these facts, plaintiffs could have taken reasonable steps to protect their interests with regard to the lease.

23. Defendants had a duty to communicate to plaintiffs the facts of dissolution and liquidation of Spenax Corporation and the agreement that Staples was not assuming liabilities under the lease.

24. Defendants Robert J. Coulter, David E. Greene, and Robert P. Kassing, acting individually and as agents and servants of defendant Staples and defendant Staples, Inc., maintained silence, and concealed from plaintiffs the facts of dissolution and liquidation of Spenax Corporation and the agreement that Staples was not assuming liabilities under the lease.

25. Defendants intended that plaintiffs rely on the absence of knowledge, or concealment, of the facts of dissolution and liquidation of Spenax Corporation and the agreement that Staples was not assuming liabilities under the lease.

26. Plaintiffs reasonably and justifiably relied on the belief that Spenax Corporation had not been dissolved and liquidated and that defendant Staples had assumed the liabilities of Spenax Corporation under the lease agreement.

27. The facts of the dissolution and liquidation of Spenax Corporation and the agreement that Staples was not assuming liabilities under the lease were not discoverable by plaintiffs in the exercise of reasonable diligence.

28. Proximately, directly, and solely as a result of defendants' fraudulent concealments, plaintiffs have been injured and damaged, by being deprived of the rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

SECOND CAUSE OF ACTION FOR UNFAIR TRADE PRACTICE

29. Plaintiffs reallege all of the allegations contained in paragraphs 1 through 13 and 15 through 28 hereof, as fully as if again set forth herein.

30. The foregoing conduct on the part of defendants constitutes unfair and deceptive acts and practices affecting commerce, in violation of N.C.G.S. § 75-1.1(a).

31. Proximately, directly, and solely as a result of defendants' commission of unfair and deceptive acts and practices affecting commerce, plaintiffs have been injured and damaged, by being deprived of the rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

THIRD CAUSE OF ACTION AGAINST DISTRIBUTEES OF THE PROPERTY OF SPENAX CORPORATION

32. Plaintiffs reallege all of the allegations contained in paragraphs 1 through 13 and 15 through 18 hereof, as fully as if again set forth herein.

33. At and prior to the dissolution and liquidation of Spenax Corporation defendant Robert J. Coulter received liquidating distributions in the amount of $1,147,266 and defendant E. Greene received liquidating distributions in the amount of $764,844.

34. To the extent of the assets of Spenax Corporation acquired by them, defendants Robert J. Coulter and David E. Greene are liable for the unsatisfied obligations of Spenax Corporation under the lease agreement with plaintiffs.

35. Defendants Robert J. Coulter and David E. Greene are justly indebted to plaintiffs for all unpaid rent, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

36. Defendants Robert J. Coulter and David E. Greene have failed and refused to pay to plaintiffs any of the foregoing amounts.

37. Proximately, directly, and solely as a result of violation of the obligations of defendants Robert J. Coulter and David E. Greene to pay plaintiffs the foregoing amounts, plaintiffs have been injured and damaged, by being deprived of the rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

FOURTH CAUSE OF ACTION TO RECOVER FOR FRAUDULENT CONVEYANCES

38. Plaintiffs reallege all of the allegations contained in paragraph 1 through 13, 15 through 18, and 33 hereof, as fully as if again set forth herein.

39. Defendants Robert J. Counter and David E. Greene conveyed money and assets to their respective wives, defendants Virginia Coulter and Sheila G. Greene, with a value of many hundreds of thousands of dollars each in 1988 and 1989.

40. The conveyances of the funds and property of Spenax Corporation to defendants Robert J. Coulter, David E. Greene, Staples, Staples, Inc., and Robert P. Kassing, were voluntary and without consideration, and Spenax Corporation did not retain property fully sufficient to pay its debts then existing, including the indebtedness to plaintiffs under the lease agreement.

41. The conveyances of the funds and property of defendants Robert J. Coulter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene were voluntary and without consideration, and defendants Robert J. Coulter and David E. Greene did not retain property fully sufficient to pay their debts then existing, including the indebtedness to plaintiffs by reason of the other causes of action set forth herein.

42. The conveyances of the funds and property of Spenax Corporation to defendants Robert J. Coulter, David E. Greene, Staples, Staples, Inc., and Robert P. Kassing, were voluntary and without consideration, and were made with the actual intent of Spenax Corporation to defraud creditors, including plaintiffs.

43. The conveyances of the funds and property of defendants Robert J. Counter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene were voluntary and without consideration, and were made with the actual intent of defendants Robert J. Coulter and David E. Greene to defraud creditors, including plaintiffs.

44. The conveyances of the funds and property of Spenax Corporation to defendants Robert J. Coulter, David E. Greene,

Staples, Staples, Inc., and Robert P. Kassing, even if for a valuable consideration, were made with the actual intent on the part of Spenax Corporation to defraud creditors, including plaintiffs, which intent was participated in by defendants Robert J. Coulter, David E. Greene, Staples, Staples, Inc., and Robert P. Kassing, or of which these defendants had notice.

45. The conveyances of the funds and property of defendants Robert J. Coulter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene, even if for a valuable consideration, were made with the actual intent on the part of defendants Robert J. Coulter and David E. Greene to defraud creditors, including plaintiffs, which intent was participated in by defendants Virginia Coulter and Sheila G. Greene, or of which these defendants had notice.

46. The conveyances of the funds and property of defendants Robert J. Coulter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene were made in trust for the use of the persons making the transfers.

47. The foregoing circumstances establish that the conveyance of the assets of Spenax Corporation to defendants Robert J. Coulter, David E. Greene, Staples, Staples, Inc., and Robert P. Kassing, and the conveyance of the assets of defendants Robert J. Coulter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene were fraudulent conveyances under the common law of the state of North Carolina and N.C.G.S. § 39-15.

48. The foregoing circumstances establish that the conveyance of the assets of Spenax Corporation to defendants Robert J. Coulter, David E. Greene, Staples, Staples, Inc., and Robert P. Kassing, and the conveyance of the assets of defendants Robert J. Coulter and David E. Greene to defendants Virginia Coulter and Sheila G. Greene were fraudulent conveyances under the common law of the state of Indiana, and Indiana Code § 32-2-1-14 and 15.

49. Proximately, directly, and solely as a result of the fraudulent conveyances, plaintiffs have been injured and damaged, by being deprived of the rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

FIFTH CAUSE OF ACTION FOR INDIVIDUAL LIABILITY OF ALLEGED LIMITED PARTNERS

50. Plaintiffs reallege all of the allegations contained in paragraphs 1 through 13 and 15 through 18 hereof, as fully as if again set forth herein.

51. The purported refusal of Staples to assume any of the liabilities or obligations of Spenax Corporation under the lease agreement with plaintiffs, while accepting and receiving all of the benefits, rights, and advantages of that lease agreement, was ineffective; and by operation of law, Staples became liable for the liabilities and obligations of Spenax Corporation under the lease agreement with plaintiffs.

52. The liabilities and obligations of Staples under the lease agreement with plaintiffs became the personal liabilities and obligations of defendants Robert J. Coulter and David E. Greene, as

ostensible general partners, and manager and assistant manager, respectively, of Staples, and of defendant Robert P. Kassing, as the alter ego of the general partner Staples, Inc., in accordance with the provisions of the common laws of the state of North Carolina and of the state of Indiana, and in accordance with the provisions of N.C.G.S. § 59-303(a) and Indiana Code § 23-16-4-3(a)(2).

53. Defendants Robert J. Coulter and David E. Greene have failed and refused to pay plaintiffs rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

54. Proximately, directly, and solely because defendants Robert J. Coulter, David E. Greene, and Robert P. Kassing have breached their obligations to make the payments to plaintiffs to which they are entitled under the lease agreement, plaintiffs have been injured and damaged, by being deprived of the rental payments, taxes, insurance, repairs, maintenance, and other operating expenses, which are the obligation of the lessee under the lease agreement.

SIXTH CAUSE OF ACTION FOR DECLARATORY JUDGMENT ON STATUTE OF LIMITATIONS

55. Plaintiffs reallege all of the allegations contained in paragraphs 1 through 13, 15 through 18, and 33 hereof, as fully as if again set forth herein.

56. Plaintiffs anticipate that defendants may seek to rely on the provisions of Indiana Code § 23-1-45-7(c)(1), which appears to create a two-year statute of limitations, after which claims are

barred against distributees of corporations that have gone through dissolution and liquidation, when the only notice given by these corporations to known creditors is a legal advertisement in an obscure newspaper, of which the creditors did not receive actual notice.

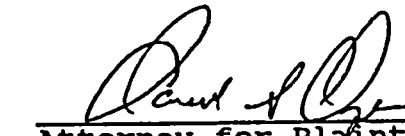
57. The enforcement of the foregoing provision of the Indiana Code in the manner defendants are anticipated to construe it, would deprive plaintiffs of due process of law contrary to the Fourteenth Amendment to the United States Constitution, by confiscating their property rights without sufficient and adequate notice.

58. Plaintiffs are entitled to a declaratory judgment that Indiana Code § 23-1-45-7(c)(1) cannot constitutionally be interpreted to extinguish plaintiffs' rights against defendants.

WHEREFORE, plaintiffs pray that they have and recover of defendants, jointly and severally, their actual damages under the first, third, fourth, and fifth causes of action and their treble damages under the second cause of action; that the judgement bear such interest thereon as is provided by law; that the court enter a declaratory judgment as prayed for in the sixth cause of action; that all issues of fact by tried by jury; that the costs of this action be taxed against defendants, plaintiffs' reasonable attorneys' fees with respect to their second cause of action; and that plaintiffs have such other and further relief as to the court may seem just and proper.

Attorney for Plaintiffs

Norman B. Smith
Smith, Follin & James
PO Box 990
Greensboro, NC 27402
(919) 274-2992
NCSB 4962



Attorney for Plaintiffs
Donald G. Orzeske
Osborn Hiner & Lisher
Suite 380, One Woodfield
8330 Woodfield Crossing Blvd.
Indianapolis, IN 46240

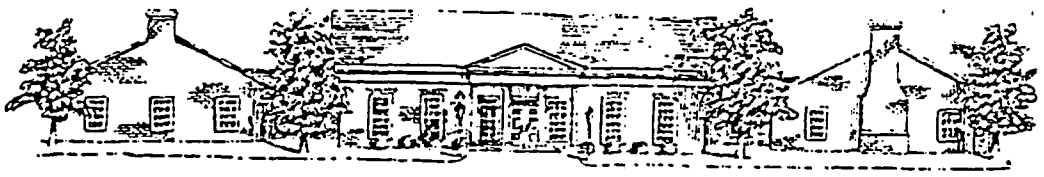
CERTIFICATE OF SERVICE

I, Donald G. Orzeske, attorney for plaintiffs in the above-entitled action, do hereby certify that I have served a copy of the foregoing, Motion to Substitute Amended Complaint for Original Complaint and to Join Additional Parties Defendant, on opposing counsel of record at the last known address known to me, by placing said document in an envelope with first-class postage affixed, and by depositing said envelope in the U.S. Post Office in Indianapolis, Indiana, this 13th day of January, 1993, said envelope being addressed as follows:

Mr. Terrill D. Albright
Baker and Daniels
300 N. Meridian Street, #2700
Indianapolis, IN 46204

Mr. Arthur P. Kalleres
Ice Miller Donadio and Ryan
One American Square
Box 82001
Indianapolis, Indiana 46282

Attorney for Plaintiffs
Donald G. Orzeske
Osborn Hiner & Lisher
Suite 380, One Woodfield
8330 Woodfield Crossing Blvd.
Indianapolis, IN 46240



TOWN OF JAMESTOWN

Settled in 1752 Chartered in 1816

Jamestown, North Carolina 27282

May 6, 1982

Mr. Ted Mew
N. C. Department of Natural
Resources & Community Development
P. O. Box 27687
Raleigh, North Carolina 27611

Dear Mr. Mew:

This letter is being written as agreed earlier this year concerning the cleaning up of waste that Power's Wire was discharging into our system.

As you know the Town stated that if the waste was not in compliance by May 1, 1982 the town would cut off water and sewer service to Powers Wire.

By working closely with the town, Powers Wire is cleaning up their waste by using two approaches. The first was the company sold their wire drawing process to an out of state company and is buying only pre-finished wire which solved most of their waste problems. The second approach of course was the elimination of their lagoon or settling basin.

The Town, working closely with them, has been allowing them to discharge approximately 20,000 gallons a day of neutralized liquid. Once most of the liquid has been drained off then Powers Wire will dispose of the sediments under the supervision of NRCD's Regional Office in Winston-Salem.

Also it has been agreed to by Powers Wire that after removing the sediments, they would neutralize the basins bed and fill in the basin.

The Town feels that the above conditions will help in eliminating the problems the town's waste treatment facilities have been having during past years ard that the town's discharges into Deep River will be the cleanest it has been in many years.

Again I would like to thank you for all the help your office has given in helping Jamestown solve its waste problems. We are continually trying to improve our system.

We have just recently started buying jointly with the City of High Point of supplies in order to keep treatment cost down yet operate an efficient and cleaner system.

If you have any further questions please feel free to call.

Thank you,

TOWN OF JAMESTOWN

John J. Frezell
Town Manager

cc: Mayor and Town Council
Mr. Steve Mauney, Dept. of NRCD
Winston-Salem Regional Office

Additional Site Assessment

Former L.P. Staples Facility
Jamestown, North Carolina

Prepared for
Dr. Semour Filman

September 22, 1994

David Groce
Environmental Scientist

Edmund Q.B. Henriques, P.G.
Project Manager

ENSCI Environmental, Inc.
1108 Old Thomasville Road
High Point, North Carolina 27260
(910) 883-7505

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Figures:

Appendices:

1. Introduction

ENSCI Environmental, Inc. was contracted to perform additional site assessment investigations at the former L.P. Staples property located at 105 Ragsdale Road in Jamestown, North Carolina (see **Figure 1**). The assessment is a follow-up investigation of work performed by ENSCI personnel during June, 1994.

1.1 Site History

ENSCI performed a phase I environmental site assessment of the property in November 1992. During this site assessment, ENSCI personnel reviewed public and private records, which included chains of title, USGS maps, aerial photographs, regulatory agency records, surrounding land use, and local authority records. Based on this ENSCI recommended that all 55 gallon drums be properly disposed of, the oil/water separator and sump be closed, with their contents being characterized and disposed of.

On April 8 - 16, 1993, ENSCI personnel completed a phase II Environmental Assessment where 13 hand augered soil borings were used to obtain soil samples of laboratory analysis, the oil/water separators contents were sampled for analysis, and a composite sample from ten of the 55-gallon drums was obtained for analysis. Results of the soil samples collected from the hand augered borings indicated low levels of pyrene, chrysene, and benzo-anthracene were detected in one soil boring. The presence of these compounds suggested soils impacted by petroleum products, possibly oils and or grease. Analysis of the oil/water separator and the 55-gallon drums indicated the contents were nonregulated, although some hazardous constituents were detected requiring proper disposal at an approved facility.

In July 1993, additional soil samples were taken from the area immediately adjacent to the boring where the pyrene, chrysene, and benzo-anthracene were detected. These samples were taken to assess if the petroleum constituents previously detected were indicative of oil & grease impacts. Analytical results in accordance with EPA Method 9071 indicated 560 ppm Total Petroleum Hydrocarbons in the form of Oil and Grease. This level exceeds the initial action limit of 250 ppm TPH established by the North Carolina Department of Environment, Health and Natural Resources (NCDEHNR).

At the close of this phase of the investigation, two options were available:

- Assess the possible final clean-up levels through defining the extent of contamination and performing an SSE to calculate a final cleanup level.

- Excavate and dispose of the petroleum contaminated soil from the impacted area.

In an effort to expedite the cleanup, excavation and disposal was selected.

On August 29, 1993, ENSCI excavated approximately 11.96 tons of petroleum impacted soil. During the excavation activities, a terra cotta pipe was uncovered along the excavation wall, the pipe appeared oriented toward the oil water separator. Visible oil staining was observed beneath and surrounding the pipe, which indicated a possible release(s) from this previously undetected pipe. An evaluation of this and other potential releases from this pipe were therefore warranted and necessary.

On January 12 and 13, 1994, ENSCI personnel excavated a total of 6 test pits with a backhoe in an attempt to track the path of a discharge pipe, to its postulated origin at the oil/water separator. Test Pits 1, 2, and 4 revealed a terra cotta pipe resting just above the bedrock surface. Connection of the pipe to the oil/water separator was verified although, it became evident that it was not the same line encountered in previous work. Rather, it appeared that this line originated in the area of the compressor shed, although it's terminus was not verified (see Figure 2). Test Pits 3, 5, and 6 were positioned to intercept the terra cotta pipe where it was originally observed near the east corner of the solvent shed. However, no the pipe was not discovered in any of these excavations.

At this point the search for the terra cotta pipe was temporarily discontinued. Due to the shallow depth to bedrock detected in Test Pits 1, 2, and 4, potential releases from the pipe in this area could impact groundwater. Therefore, ENSCI recommended an assessment of possible groundwater impact.

On June 22, 1994, ENSCI personnel remobilized to the site, and installed one Type II monitoring well to assess the presence or absence of groundwater contamination. Analytical results of this monitoring well indicated the presence of acetone in the groundwater at levels which exceed the NCAC 2L Groundwater quality standards. Therefore, ENSCI proposed the following scope of work to further the assessment of groundwater impacts.

2. Scope of Work

In order to comply with federal and state regulatory guidelines, ENSCI performed the following scope of work:

- Installing two Type II monitoring wells
- Collecting groundwater samples for laboratory analysis
- Surveying the surrounding area and the monitoring wells

The site work was performed on August 19, 1994, and the groundwater samples were collected on August 22, 1994.

3. Monitoring Well Installation

In order to further assess the extent of groundwater contamination, monitoring wells MW-2 and MW-3 were installed in order to acquire a groundwater sample. These wells were constructed in borings which were installed hydraulically downgradient in respect to the oil/water separator and suspect piping location (see **Figure 2**). These type II monitoring wells were installed to a depth of approximately 25 feet below surface grade with factory-slotted well screen comprising the lower 20 feet of the well.

3.1 Groundwater Flow Direction

In order to approximate the groundwater flow direction, ENSCI conducted a site survey to establish the locations of all monitoring wells and other features. Well casing elevation data from this survey was used in conjunction with depth to groundwater measurements collected on August 22, 1994 to determine the relative groundwater elevation at each monitoring well (see **Table 1**). This information, in addition to the relative horizontal locations of the monitoring wells, was used to determine the groundwater flow direction.

Table 1: Groundwater Elevation Data
(collected 8/22/94)

Monitoring Well	Elevation of Top of Casing (ft.)	Depth To Groundwater (ft.)	Groundwater Elevation
MW-1	99.40	8.70	90.70
MW-2	98.77	8.75	90.02
MW-3	98.96	7.67	91.29

Based on the available groundwater elevation data, groundwater flow is generally toward the south (Figure 2).

4. Monitoring Well Sampling

Groundwater samples collected from monitoring wells MW-2 and MW-3 were submitted for laboratory analysis for volatile organic compounds in accordance with EPA method 8240. The sampling procedure used to obtain laboratory samples from the monitoring wells is outlined in Appendix A.

Prior to the collection of each sample, ENSCI personnel used the following decontamination procedure to clean the sampling equipment in order to prevent cross-contamination of samples:

1. Wash with nonphosphate detergent and water, brush to remove particulate matter.
2. Rinse with deionized water.
3. Rinse with 10 percent nitric acid solution.
4. Rinse with deionized water.
5. Rinse with pesticide-grade isopropyl alcohol.
6. Rinse with deionized water.
7. Air dry as long as possible.

As an additional measure to prevent cross contamination, disposable latex gloves were worn during sample collection and changed between samples.

5. Analytical Results

Table 2, presents summary of the groundwater analytical data collected to date. The corresponding NCAC 2L groundwater quality standards for each detected compound are presented for reference.

Table 2
Analytical Results
All results are in parts per million

Compound	MW-1	MW-2	MW-3	NCAC 2L Standards
Acetone	1.8	<0.1	23	0.7
Toluene	0.012	<0.005	<0.005	1.0
Tetrachloroethylene	<0.005	0.006	<0.005	0.0007
2-Butanone (MEK)	<0.1	<0.1	0.120	0.17

< = less than

As indicated in Table 2, concentrations of acetone and tetrachloroethylene were detected at levels which exceed NCAC 2L groundwater quality standards. Based on the detected concentrations of acetone, monitoring well MW-3 is thought to exist near the source of the detected contaminants, possibly indicating the adjacent subgrade terra-cotta pipe as a source. By comparison, the acetone concentrations are relatively lower at MW-1, which is located near the oil/water separator (see **Figure 3**). A copy of the analytical results are included in **Appendix B.**

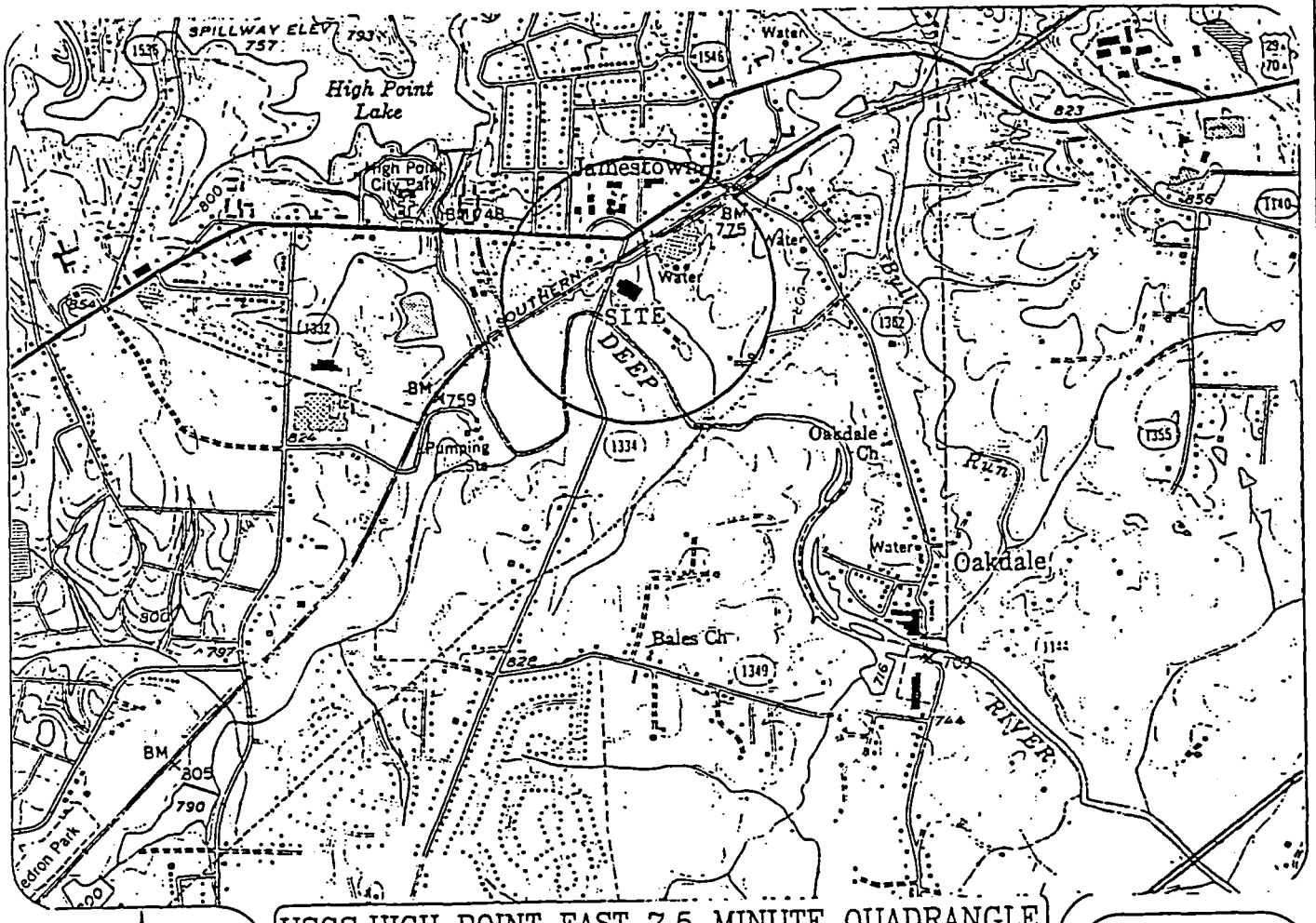
6. Conclusions and Recommendations

Groundwater analytical data collected to date has evidenced the detection of four volatile organic compounds; acetone, toluene, tetrachloroethylene, and 2-butanone. Of the four detected compounds, acetone and tetrachloroethylene were detected in concentrations which exceed the groundwater quality standards in accordance with NCAC, Title 15A, Subchapter 2L, Classifications and Water Quality Standards Applicable to the Groundwater of North Carolina. As a result of this violation of groundwater quality standards, a comprehensive site assessment which describes the full vertical and horizonal extent of the contamination will be required.

Figures

TOPOGRAPHICAL MAP

CHAMBERS, PRICE, & BRITT
Jamestown, North Carolina



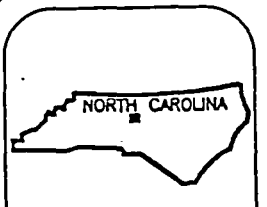
USGS HIGH POINT EAST 7.5 MINUTE QUADRANGLE

DATE OF MAP: 1950 PHOTOREVISION DATE: 1982

PHOTOREVISION DENOTED IN PURPLE (COLOR MAPS ONLY)

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SCALE 1:24000



QUADRANGLE LOCATION

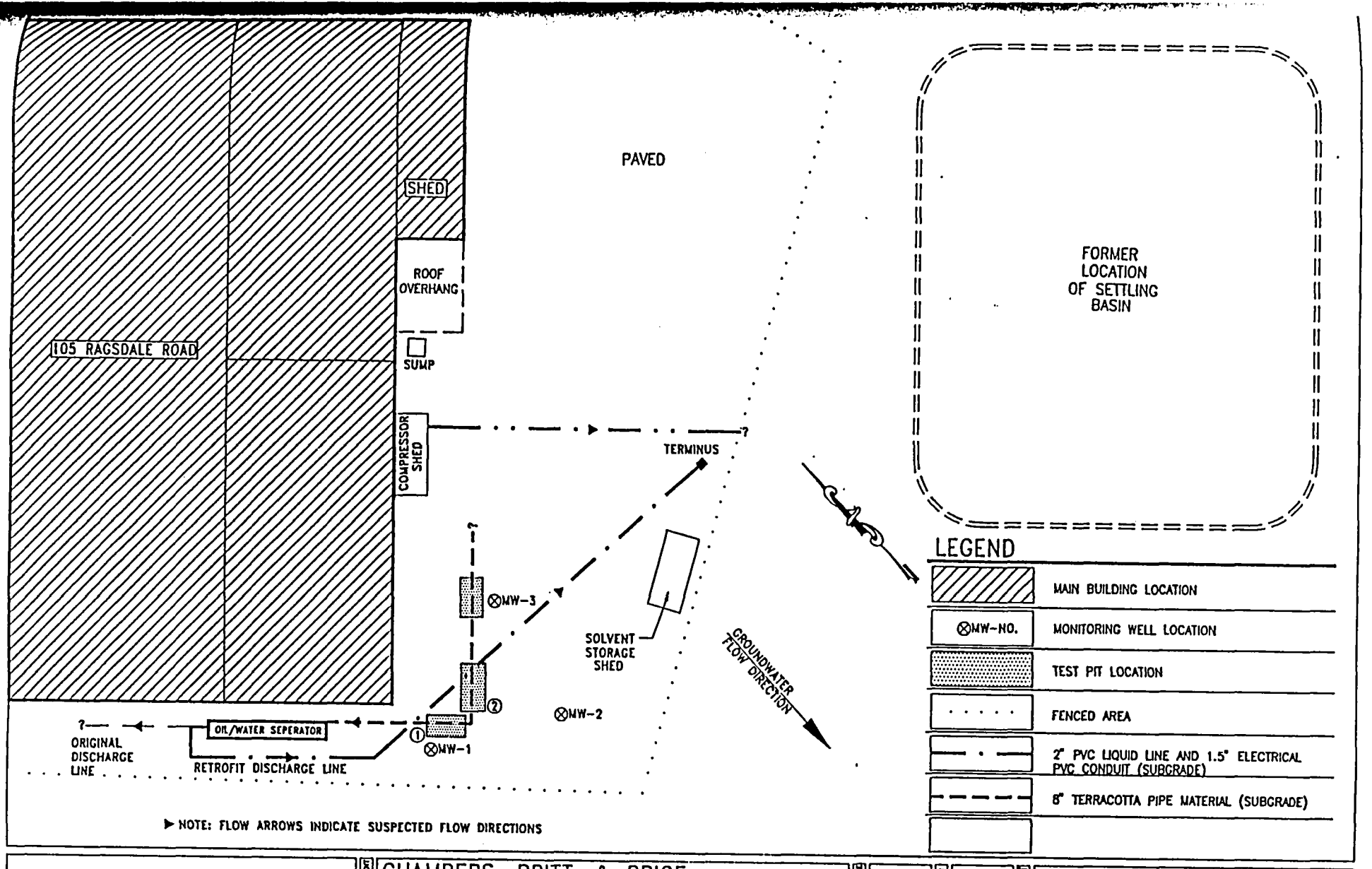
ROAD CLASSIFICATION

HEAVY-DUTY
MEDIUM-DUTY
LIGHT-DUTY
FOOT TRAIL
WGN & JEEP TRACK
UNIMPROVED ROAD

U.S. ROUTE
STATE ROUTE
INTERSTATE ROUTE

ENSCI® CORPORATION
HIGH POINT, NORTH CAROLINA

FOR: CHAMBERS, PRICE, & BRITT
CITY: JAMESTOWN
STATE: NORTH CAROLINA
TITLE: TOPOGRAPHIC MAP
SCALE: 1"=2000'
DWN BY: DJ
DWG NAME: USGS-1
FIGURE: 1
DATE: 11/18/92
CK BY: CB
JOB #: AC35-005



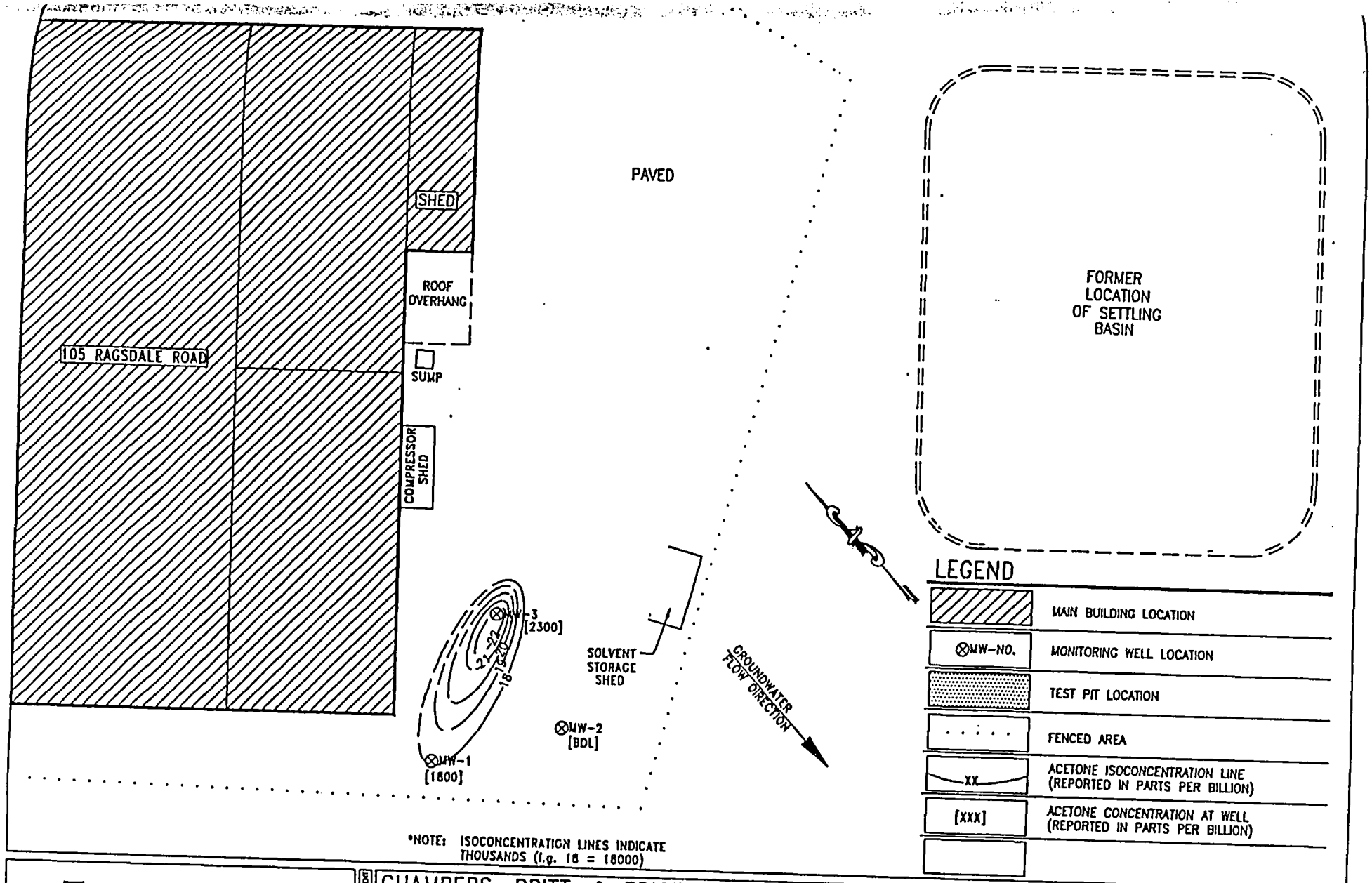
ENTACT® ENGINEERING GROUP, P.A.

CLIENT	CHAMBERS, BRITT, & PRICE	SCALE	1"=40'
SITE	105 RAGSDALE ROAD	DATE	8/24/94
CITY	JAMESTOWN	STATE	NORTH CAROLINA
TITLE	MONITORING WELL LOCATION MAP	DWG	RC35-086

DRWN: DJ
CHKD: EQBH
JOB #: RC35-086
PROJ #:

GRAPHIC SCALE IN FEET
40 30 20 10 0 20 40
1"=40'

wadell waters
Sherry Knight- WLS 896-7007



*NOTE: ISOCONCENTRATION LINES INDICATE THOUSANDS (I.g. 18 = 18000)

ENACT® ENGINEERING GROUP, P.A.

CLIENT	CHAMBERS, BRITT, & PRICE	SCALE	1"=40'
SITE	105 RAGSDALE ROAD	DATE	8/24/94
CITY	JAMESTOWN	STATE	NORTH CAROLINA
TITLE	ACETONE ISOCONCENTRATION MAP	DWG	RC35-086

DRWN	DJ
CHKD	EQBH
APVD	RC35-086
FIG.	3

GRAPHIC SCALE IN FEET

40 30 20 10 0 20 40

1"=40'

Appendix A

Technical Methods and Field Drilling Records

Soil Boring/Monitoring Well Installation

ENSCI used the following procedure to install soil borings and monitoring wells at this site:

1. Boring and well locations were chosen, and 2 by 2 foot squares were cut in the asphalt, if necessary.

2. All-down hole drilling equipment was steam cleaned prior to use and between borings.

3. Borings were advanced using a truck-mounted drill rig and 6.25-inch outside diameter air impact hammers.

4. Two Type II monitoring wells (MW-2 and MW-3) were installed using 2-inch schedule 40 PVC riser and 2-inch, 0.010-inch slotted well screen.

5. A filter pack of #3 well sand was installed to a level of 2 feet above the top of the screen in each well. A 1.5-foot bentonite seal was placed on top of the filter pack and the annular space was backfilled to grade with a portland cement/bentonite grout. At the surface, each well was secured with a locking cap and a bolt-down manhole cover set in a 2 by 2 foot concrete pad.

6. All wells were developed by removing three casing volumes of water with a teflon bailer. All water removed during development was placed in drums for subsequent disposal.

Groundwater Sampling Procedure For Monitoring Wells

1. Depth to groundwater and total well depth were measured using a properly decontaminated electric interface probe. This information was recorded and the volume of the water in the well casing was calculated

2. To purge stagnant water from each well, three casing volumes of water were removed from each well or the well was bailed to dryness twice using a properly decontaminated Teflon bailer. Water removed from wells during purging was placed in drums for later disposal.

3. Groundwater samples were collected with a properly decontaminated Teflon bailer, placed in properly prepared glass containers, packed in ice, and delivered to EnviroTech Mid-Atlantic in Blacksburg, Virginia for analysis using EPA Method 8240 for solvents. Proper chain of custody procedures were maintained from the time of sample collection through analysis.

4. To prevent cross contamination of samples between wells, a properly decontaminated Teflon bailer was used for each well. Disposable latex gloves were worn by field personnel during purging and sampling and were changed between wells.

Appendix B

Analytical Results

EnviroTech Mid-Atlantic Laboratories
1861 Pratt Dr. • Blacksburg, VA 24060
(703) 231-3983 • Fax (703) 231-3984

August 30, 1994

Client: ENSCI Environmental, Inc.
1108 Old Thomasville Road
High Point, NC 27260

Attention: Ed Henriques

Fax: 910-882-7958

Report #: 7859
Project: LP Staples
P.O. #: 34211

Date Received: 8/24/94
Project #: EQ02-014

Sample Identification

Samples submitted and identified by client as:

Sample	Matrix	Field Identification	Date	Time Collected
7859A	Liquid	MW-2	8/22/94	8:55
7859B	Liquid	MW-3	8/22/94	7:47

All analyses were performed in accordance with EPA methods referenced in "Methods for Chemical Analysis of Water and Wastes", EPA 600/4-79 revised March 1983 and/or "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", SW-846, 3rd Edition.

Project: LP Staples

ENVIROTECH MID-ATLANTIC
August 30, 1994

Analysis	D/L	7859A MW-2	7859B MW-3
VOLATILE ORGANICS GC/MS (µg/L)			
Acetone	100	BDL	—
	1000	—	23,000
Benzene	5.0	BDL	BDL
Bromodichloromethane	5.0	BDL	BDL
Bromoform	5.0	BDL	BDL
Bromomethane	10	BDL	BDL
2-Butanone (MEK)	100	BDL	120
Carbon disulfide	5.0	BDL	BDL
Carbon tetrachloride	5.0	BDL	BDL
Chlorobenzene	5.0	BDL	BDL
Chloroethane	10	BDL	BDL
2-Chloroethyl vinyl ether	10	BDL	BDL
Chloroform	5.0	BDL	BDL
Chloromethane	10	BDL	BDL
Dibromochloromethane	5.0	BDL	BDL
Dichlorodifluoromethane	5.0	BDL	BDL
1,1-Dichloroethane	5.0	BDL	BDL
1,2-Dichloroethane	5.0	BDL	BDL
1,1-Dichloroethene	5.0	BDL	BDL
cis-1,2-Dichloroethene	5.0	BDL	BDL
trans-1,2-Dichloroethene	5.0	BDL	BDL
1,2-Dichloropropane	5.0	BDL	BDL
cis 1,3-Dichloropropene	5.0	BDL	BDL
trans 1,3-Dichloropropene	5.0	BDL	BDL
Ethylbenzene	5.0	BDL	BDL
2-Hexanone	50	BDL	BDL
Methylene chloride	5.0	BDL	BDL
4-Methyl-2-pentanone (MIBK)	50	BDL	BDL
Styrene	5.0	BDL	BDL
1,1,2,2-Tetrachloroethane	5.0	BDL	BDL
Tetrachloroethene	5.0	6.0	BDL
Toluene	5.0	BDL	BDL
1,1,1-Trichloroethane	5.0	BDL	BDL
1,1,2-Trichloroethane	5.0	BDL	BDL
Trichloroethene	5.0	BDL	BDL
Trichlorofluoromethane	5.0	BDL	BDL
Vinyl acetate	50	BDL	BDL
Vinyl chloride	10	BDL	BDL
total Xylenes	5.0	BDL	BDL

D/L - Detection Limit BDL - Below Detection Limit

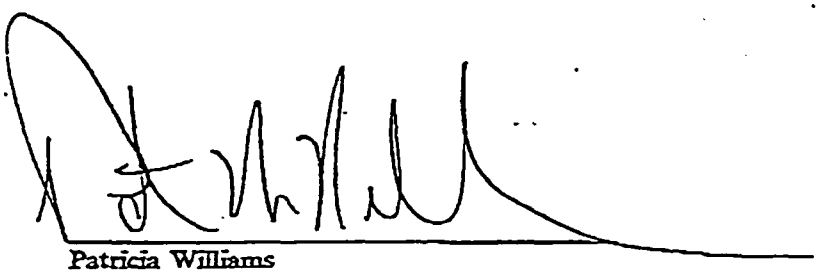
Soil results are reported on a dry weight basis unless otherwise noted.

Project: LP Staples

ENVIROTECH MID-ATLANTIC
August 30, 1994

Quality Control Data

Analysis	%STD	%Spike	%RD	EPA#	Analyst	Date Analyzed
Volatile Organics				8240	A. Campbell	8/30/94
1,1 DCE		94	9.6			
TCE		96	<1.0			
C Benzene		98	2.0			
Benzene		104	1.0			
Toluene		104	1.9			



Patricia Williams
Organics Section Head

D/L - Detection Limit BDL - Below Detection Limit

Soil results are reported on a dry weight basis unless otherwise noted.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JAYGEE REALTY CO., a New York General Partnership; EFBE REALTY CO., a New York General Partnership; SEYMOUR FILMAN; MYRON BELFER; ABNER ROSEN; and JONATHAN ROSEN,	)	
Plaintiffs,	)	
v.	)	Cause No. IP 92-948-C
ROBERT J. COULTER; VIRGINIA COULTER; DAVID E. GREENE; SHEILA G. GREENE; ROBERT P. KASSING; STAPLES, an Indiana Limited Partnership; and STAPLES, INC.	)	

CONSENT ORDER

It appearing to the court that counsel for plaintiffs and defendants have consented to the entry of an order allowing plaintiffs to substitute their second amended complaint for their amended complaint; it is now, therefore,

ORDERED, that plaintiffs' second amended complaint be, and the same thereby is, substituted for their amended complaint. Defendants shall have 30 days from and after the date hereof within which to answer or otherwise plead to the second amended complaint.

The 28 day of June, 1993.

/s/
United States Magistrate Judge

CONSENTED TO:

Attorney for Plaintiffs
Norman B. Smith
Smith, Follin & James
PO Box 990
Greensboro, NC 27402
(919) 274-2992
NCSB 4962

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Indianapolis, IN 46240

Attorney for Defendants
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Phase II Site Assessment Proposal

105 Ragsdale Road
Jamestown, North Carolina
October 3, 1994
ENSCI Proposal #P94-502

Prepared for

Dr. Seymour Filman

ENSCI Engineering Group, P.A.
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Introduction

ENSCI Engineering Group, P.A. is pleased to submit this proposal for additional assessment of the facility located at 105 Ragsdale Road, Jamestown, North Carolina.

Scope of Work

In order to comply with federal and state regulatory guidelines and your need for additional assessment of the property, ENSCI has developed the following scope of work:

- Screening soil samples using Organic Vapor Analyzer (OVA)
- Installing three Type II groundwater monitoring wells
- Performing field measurement of aquifer parameters
- Collecting groundwater samples for laboratory analysis
- Interpreting data and reporting findings and recommendations.

Soil Screening

During monitoring well installation, ENSCI will collect soil samples and screen them using an organic vapor analyzer (OVA). In the event that OVA readings indicate the potential presence of volatile organic compounds, ENSCI will send a sample(s) to a certified laboratory for analysis using EPA method 8240 for $325/sample. This cost is not included in the table below.

Monitoring Well Installation and Flow Direction Calculation

Three Type II (shallow) monitoring wells will be installed in 25-foot soil borings. The wells will consist of 2-inch diameter Schedule 40 PVC pipe with flush-threaded joints. The bottom section of PVC pipe will consist of manufactured well screen with 0.010-inch wide slots. The well screen will be placed so that the static water level is within the screened section.

After the well casing is installed, washed sand will be placed around the casing to at least 2 feet above the top of the well screen section. The sand backfill will stabilize the well casing and help yield a less turbid groundwater sample. A bentonite seal (a minimum of 1 foot thick) will be installed on top of the sand backfill to seal the well. The remainder of the well boring outside the pipe will be grouted with portland cement to grade (ground

surface). A lockable, flush-mounted steel protective cover will be placed over each monitoring well.

Groundwater flow direction will be calculated using field measurements collected by an onsite geologist. Flow direction will be calculated by surveying the tops of the well casings relative to a benchmark elevation, measuring the depth to the static water table in each well, calculating the relative water table elevations, and inputting all values to a software system designed to determine the water table gradient and flow direction.

Groundwater Sampling and Analysis

In preparation for sampling, the measured water level values will be used in conjunction with the total casing depth to determine the height of the water column and the volume of water standing in the well. The well will be purged by removing at least three times the volume of water within the well, or as required by state guidelines. Water which is purged from the wells will be drummed for future disposal. Disposal costs are not included in this scope of work.

Groundwater samples will be collected from the monitoring wells using Teflon bailers. The samples will be placed into laboratory glass containers with Teflon lids, appropriately preserved, and shipped to an approved laboratory for chemical analysis.

Report Preparation

Upon the receipt of laboratory results, a report will be prepared which will document site activities and observations, draw conclusions from the available data, and present recommendations for further action, if any. The document will contain complete records of field and laboratory data and will meet federal and state reporting requirements.

Project Schedule

ENSCI will begin field activities on a date which is agreed upon by both parties. The field activities which are outlined above will be completed within approximately 10 days after their initiation. The written report will follow approximately two weeks after all laboratory results have been received.

Costs

The extensions and estimated total exhibited below are approximations based on estimated units as illustrated. Actual costs will be billed on a time and materials basis according to the unit costs.

Description	Unit Cost	Estimated Units	Extension
Labor - Field Activities			
Project Manager	$65/hour	2 hours	$130
Geologist	$55/hour	10 hours	$550
Environmental Technician	$40/hour	10 hours	$400
Monitoring Well Installation			
Mobilization	Lump Sum		$350
OVA	$100/day	1 day	$100
Well Construction	$40/foot	75 total feet	$3,000
Steam Jenny	$75/day	1 day	$75
17-H 55-Gallon Drums	$35/drum	1 drum	$35
Groundwater Analysis			
EPA Method 8240	$325/sample	3 samples	$975
Report Preparation			
Project Geologist	$55/hour	20 hours	$1,100
Project Manager	$65/hour	4 hours	$260
Draftsman	$45/hour	4 hours	$180
Clerical	$29/hour	2 hours	$58
Estimated Total			$7,213

Limitations

This quotation is subject to the following conditions:

- Unit costs are effective for 30 days from the date of this proposal.

Acceptance

In order to accept this proposal, please complete the enclosed service agreement and return it to our office or fax to (910) 882-7958.

SETH R. COHEN
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