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Pleasanton, CA 94566
925.426.2600
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May 25, 2001

Mr. Barney Chan
Hazardous Materials Specialists
Alameda County Health Care Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Clayton Project No.70-97066.00

Subject: Response to Comments
Risk Assessment and Feasibility Study
Former Lemoine Sausage Facility
630 29th Avenue in Oakland, California

Dear Mr. Chan:

Clayton Group Services, Inc. (Clayton) appreciated the opportunity to meet with you on April 24, 2001 to review your letter dated March 8, 2001. As we discussed, Clayton has prepared the following responses to comments raised in your letter.

Comment 1: The risk from volatilization of chemicals from groundwater has been dismissed because of the results of previous indoor and outdoor air sampling. Please be aware that air sampling requires either shallow (3', 6' bgs) sampling in areas of concern or surface flux sampling in these same areas. Please elaborate how the March 1998 air sampling was performed and show the specific sampling locations. If the required methodology was not done, please provide a work plan to do this sampling.

Response 1: The air quality sample results presented in the Risk Assessment and Feasibility Study (RAFS) were collected using 6-Liter Summa canisters. To evaluate indoor air quality, six Summa canisters were placed at various locations within the Building as shown on the attached Figure 1. The laboratory data sheets are presented as an attachment. The inlet of each Summa canister was placed at the approximate height of the adult breathing zone, approximately 5 to 6 feet above ground/floor surface. In addition, six background samples were also collected using Summa canisters mounted on utility poles located across the street and east (upwind) of the subject building.

As discussed, the shallow groundwater conditions, low permeability soil, and high soil moisture of shallow soils (within the capillary fringe) cause a situation where significant soil moisture would be drawn into the soil gas sample containers under the applied vacuum. The presence of soil moisture would influence the quality control of soil gas

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samples. In addition, Clayton investigated the possibility of performing a surface flux chamber test in a crawl space, if present. Based on our subsurface investigations, no crawl spaces exist at the subject building. Due to these conditions, Clayton evaluated the air quality within and around the subject building. At this point, Clayton does not see the need to perform additional indoor air quality testing at the subject building.

OK
Shallow GW
eliminates need for
Subsurface vapor
Sampling

Comment 2: *The presence of chlorinated volatile organics has been attributed to an off-site source. This, however, has not been shown since no off-site sampling has been done. Regardless, you will need to evaluate the health risk of the HVOCS.*

As we stated, the presence of the chlorinated volatile organic compounds (VOCs) detected in monitor well MW-8 are not related to the underground storage tank and are not the subject of investigations performed by Clayton. Clayton has collected some data associated with the underground storage tank investigation that can be used to evaluate the health risk of the fugitive emissions from chlorinated VOCs in groundwater. The accompanying Table 1 presents the complete list of analytes tested for and detected during the 1998 air sampling event. Cis-1, 2-dichloroethene and vinyl chloride were not detected in the indoor samples and trichloroethene (TCE) was detected in three of the six indoor samples at trace or slightly above laboratory reporting levels. TCE was detected in four of the six background samples at concentrations generally higher than those detected inside the subject building.

Clayton believes that the TCE found in both indoor and background samples are due to TCE in ambient air. Due to the industrial nature of the surrounding area, there are most likely multiple off-site emission sources of TCE and other volatile organic compounds (VOCs).

will need to
continual to
monitor HVOCS
& document for closure until

Furthermore, the [REDACTED] VOCs found in the indoor air concentrations are significantly higher than those found in the exterior ambient air. In fact, from the data collected, it appears that breathing exterior ambient air poses a greater health risk to the public than breathing indoor air at the subject property.

Two compounds, 1,4-dichlorobenzene and 1,4-dichloroethane, are petroleum products that are used as chlorinating agents (1,4-dichlorobenzene is commonly used as a packaging material) to [REDACTED] 1,4-Dichlorobenzene is used as a general insecticide (commonly found in mothballs). The current property owners may wish to discontinue the use of 1,4-dichlorobenzene containing materials.

so appears methyl dichloro & benzene are higher inside bld @ levels > PRC
Comment 3: *The groundwater gradient has only recently been shown to be westerly, towards the Oakland-Alameda estuary. The presence of MW-7 as your only down-gradient data point is not sufficient to characterize the TPH plume. In addition, the upgradient extent of the TPH has not been defined. Please consider the need for additional wells or site characterization.*

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The groundwater gradient and flow direction has consistently been to the west with the exception of the initial monitoring event performed in February 1999. At the time of the initial monitoring event, only five, 3/4-inch diameter, pre-packed, monitoring wells (microwells) made up the groundwater monitoring network, and their areal distribution was less extensive than the present monitoring well network. As such, the initial monitoring event results may not have accurately represented true site conditions.

As we discussed in our meeting, there does appear to be some question as to the reliability of the microwells, particularly monitoring wells MW-3, MW-4, and MW-5. The microwells were installed due to the lack of access in the raised floor area. (As requested, Clayton will destroy MW-3, MW-4 and MW-5.) I did not request this, note mw1-5 are all 1/2" wells

Also, [REDACTED] Clayton will also install two additional monitoring wells. One downgradient of the subject property and one at the head of the plume. [REDACTED]

Comment 4: Remediation clean-up levels for TPHg were not discussed. If the storm drains act as preferential pathways then the estuary may be jeopardy and the ecological clean-up level (640 ppb) must be considered. If the hydrocarbon plume extends beneath nearby buildings, the nuisance hydrocarbon clean-up (5000 ppb) must be considered. Please confirm the absence of on-site storm drains and off-site buildings above the TPH plume.

Remediation goals for total petroleum hydrocarbons as gasoline (TPHg) were not presented because the risk assessment indicated the primary risk elements were due to the associated VOCs. As presented in the RAES, the inherent site conditions pose various difficulties (limited access, shallow groundwater, and extremely low permeability soils) for remediation and our evaluation finds that efforts to remediate this site using methods other than natural attenuation processes may be impractical.

As discussed in the meeting, storm water utilities do not discharge to the estuary and; therefore, the estuary cleanup levels do not appear appropriate. Historical groundwater monitoring data show that TPHg at levels above 5,000 ppm do not occur beneath any off-site buildings. The area immediately west of the subject property is an open scrap yard, which does not contain any permanent structures.

Comment 5: Groundwater monitoring is recommended when natural bio-attenuation is expected to proceed. While site closure can be recommended when groundwater concentrations reach a stable or decreasing trend. The site is deficient in dissolved oxygen content and TPH concentrations are elevated and do not show a decreasing trend. Therefore, option one, enhanced in-situ bio-remediation should be considered. Please provide a work plan to perform this option.

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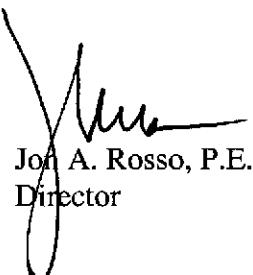
As discussed in the meeting, data from monitoring wells MW-3, MW-4, and MW-5 appear erratic. Clayton agrees to replace these monitoring points with new wells as discussed above and to continue monitoring on a quarterly basis. This monitoring should help in establishing a more reliable and accurate record of groundwater flow and TPHg trends. Following the collection of at least six quarters of data (beginning June 2001 and ending September 2002), Clayton would then like to evaluate the data trends and, if necessary, revisit the need for implementing active remediation at the subject property. Clayton will prepare a workplan for the installation of the new monitoring wells and submit it to your attention.

Thank you for the opportunity to meet as discuss site issues and we hope that the above discussion satisfies your questions with regard to the RAES. If you have any further comments or questions please contact the undersigned at (925) 426-2600.

Sincerely,



Warren B. Chamberlain, R.G., C.HG., P.E.
Project Manager
Environmental Services

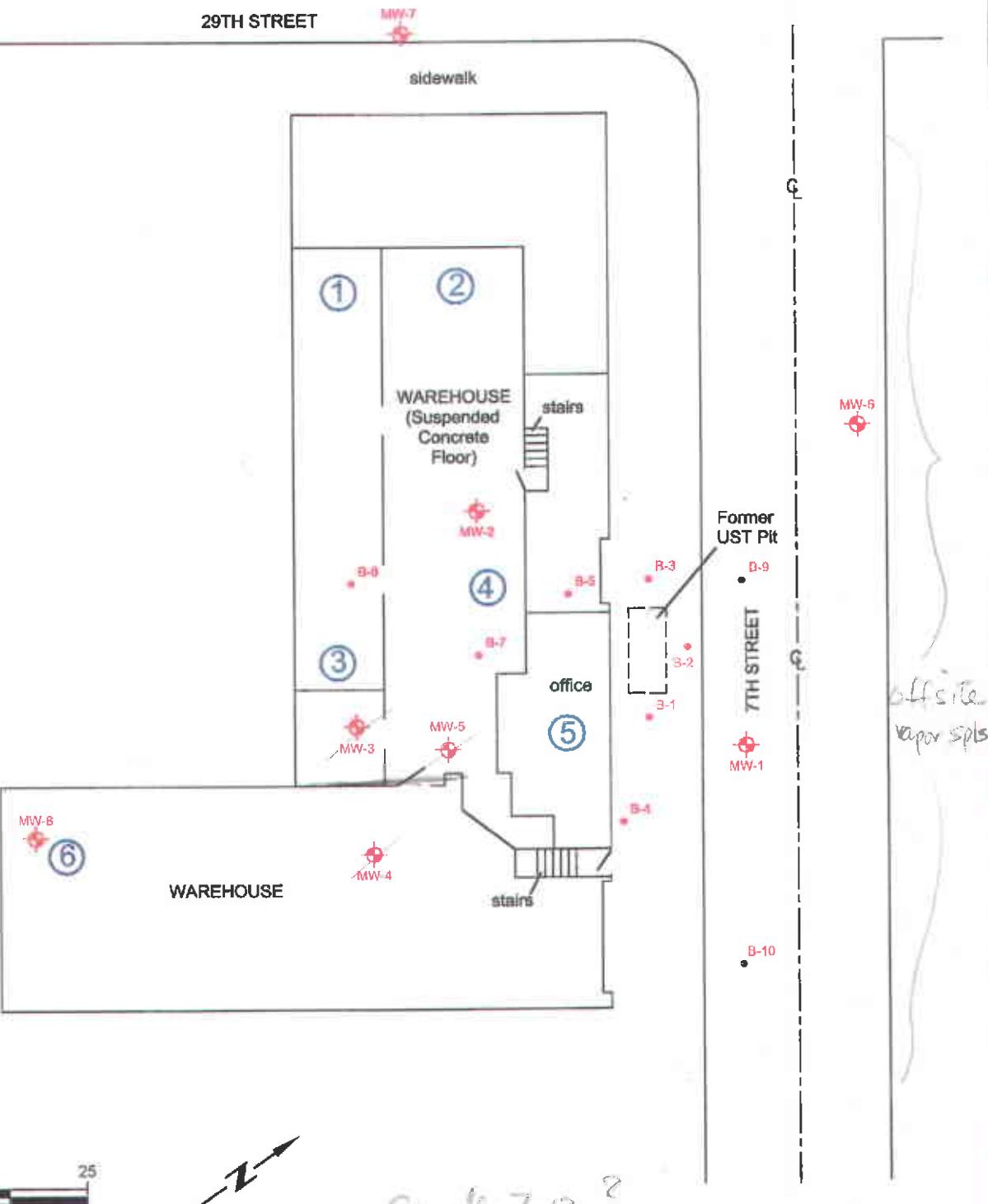


Jon A. Rosso, P.E.
Director

WBC/wbc

cc: Donna Proffitt, Bank of America
Marlin Zechman, ECS
Kristy Williams, ECS
Rita Repko, Clayton

Note:
Sample locations are approximate.



LEGEND		MONITORING WELL AND INDOOR AIR SAMPLING LOCATIONS	Figure	Clayton
MW-1	●	Monitoring Well Location	1	ENVIRONMENTAL CONSULTANTS
B-1	●	Soil Boring/Temporary Monitoring Well Location	4/25/01 SITEAIR DWG	
⑥	Indoor Air Sampling Location	FORMER LEMOINE SAUSAGE FACTORY 630 29TH AVENUE OAKLAND, CALIFORNIA Clayton Project No. 70-97066.00		

Table 1
 Summary of TO-14A Air Sampling Results
 Former Lemoine Sausage Factory
 630 29th Avenue, Oakland, California

Analyte	units	Indoor Air Samples						Upwind Background Ambient Air Samples						PRGs	Title 22
		630-1	630-2	630-3	630-4	630-5	630-6	630-7	630-8	630-9	630-10	630-11	630-12		
Chloromethane <chem>CH3Cl</chem>	ug/m ³	1.9	1.7	1.8	2.3	1.9	1.9	1.8	2.2	1.8	5.0	1.7	1.6	1.1	NE
	ppb	0.92	0.84	0.88	1.10	0.93	0.94	0.87	1.10	0.89	2.40	0.83	0.76		
Vinyl Chloride	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	4.2	<1	<1	0.22	3
	ppb	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	1.6	<0.39	<0.39		
Chloroethane	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	2.30	NE
	ppb	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38		
Bromomethane	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	5.20	NE
	ppb	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26		
Acetone	ug/m ³	45	23	48	26	29	44	72	42	33	43	140	33	6,200	NE
	ppb	19	9.6	20	11	12	18	30	18	14	18	58	14		
Trichlorofluoromethane	ug/m ³	1.9	1.8	1.7	1.8	1.7	1.7	2	1.9	1.8	1.9	1.9	1.7	730	NE
	ppb	0.35	0.32	0.31	0.32	0.31	0.31	0.35	0.34	0.32	0.34	0.34	0.31		
1,1-Dichloroethene	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	0.038	NE
	ppb	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25		
Methylene chloride	ug/m ³	2.4	2.6	3.2	2.4	1.9	2.8	1.4	<1	1.6	1.1	2.1	<1	4.1	NE
	ppb	0.7	0.76	0.94	0.71	0.56	0.81	0.41	<0.29	0.45	0.31	0.6	<0.29		
Carbon Disulfide	ug/m ³	3.6	3.3	5.9	3.7	1.3	3	1	2.2	1.7	<1	<1	3.3	730	NE
	ppb	1.2	1.1	1.9	1.2	0.42	0.96	0.32	0.71	0.53	<0.32	<0.32	1.1		
Trichlorotrifluoroethane	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	0.98 TR	<1	<1	<1	31,000	NE
	ppb	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	0.13 TR	<0.13	<0.13	<0.13		
trans-1,1-Dichloroethene	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	73	NE
	ppb	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25		
cis-1,1-Dichloroethene	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	37	NE
	ppb	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25		
1,1-Dichloroethane	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	520	1
	ppb	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25		
Methyl tert-Butyl Ether	ug/m ³	25	25	21	22	17	18	15	15	13	13	18	24	3,100	NE
	ppb	6.9	7	5.8	6	4.6	4.9	4.2	4.2	3.6	3.7	5.1	6.5		
Vinyl Acetate	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	210	NE
	ppb	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28		
2-Butanone	ug/m ³	7.2	15	8.1	5.9	5.2	5.4	6.9	7.7	8.1	11	6.5	7.4	1,000	NE
	ppb	2.4	5.1	2.8	2	1.8	1.9	2.3	2.6	2.7	3.7	2.2	2.5		
Chloroform	ug/m ³	1.3	1.1	<1	0.73 TR	<1	<1	<1	<1	<1	<1	0.79 TR	<1	0.084	40
	ppb	0.27	0.24	<0.21	0.15 TR	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	0.16 TR	<0.21		
1,2-Dichloroethane	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	1.1	98	<1	<1	0.074	10
	ppb	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	0.28	24	<0.25	<0.25		
1,1,1-Trichloroethane	ug/m ³	<1	<1	0.71TR	<1	<1	<1	<1	<1	<1	<1	<1	<1	1,000	NE
	ppb	<0.19	<0.19	0.13 TR	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19		
Benzene	ug/m ³	5.6	6.5	4.9	5.2	3.9	4.1	3.2	3.7	3.4	3.1	3.3	3.6	0.25	7
	ppb	1.8	2.0	1.5	1.6	1.2	1.3	1	1.2	1.1	0.99	1.00	1.10		
Carbon Tetrachloride	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	0.13	5
	ppb	<0.16	<0.16	<0.16	<0.16	<0.16	<0.16	<0.18	<0.16	<0.16	<0.16	<0.16	<0.16		
1,2-Dichloropropane	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	0.099	NE
	ppb	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22		
Bromodichloromethane	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	0.11	5
	ppb	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15		

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		630-1	630-2	630-3	630-4	630-5	630-6	630-7	630-8	630-9	630-10	630-11	630-12		
Trichloroethene	ug/m ³	<1	<1	<1	0.94 TR	1.2	0.97 TR	<1	1.9	2.1	1.1	3	<1	1.1	80 ⁽¹⁾
	ppb	<0.19	<0.19	<0.19	0.18 TR	0.22	0.18 TR	<0.19	0.36	0.4	0.2	0.56	<0.19		
cis-1,3-Dichloropropene	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	0.48	NE
	ppb	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22		
4-Methyl-2-pentanone	ug/m ³	1.5	1.8	1.5	1.2	0.96 TR	1.1	1.8	2.1	21	1.9	1.4	1.2	83	NE
	ppb	0.36	0.43	0.37	0.3	0.23 TR	0.27	0.45	0.52	0.51	0.46	0.33	0.3		
trans-1,1-Dichloropropene	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	0.48	NE
	ppb	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22		
1,1,2-Trichloroethane	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	0.12	NE
	ppb	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19		
Toluene	ug/m ³	35	81	27	33	20	20	18	19	16	21	16	20	400	NE
	ppb	9.3	22	7.1	8.9	5.3	5.2	4.7	5.2	4.2	5.5	4.3	5.3		
Dibromochloromethane	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	0.08	NE
	ppb	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12		
2-Hexanone	ug/m ³	<1	<1	2.2	<1	<1	<1	<1	<1	<1	<1	<1	<1	NE	NE
	ppb	<0.24	<0.24	0.54	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24		
1,2-Dibromoethane	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	0.0087	NE
	ppb	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13		
Tetrachloroethene	ug/m ³	1.9	3.0	3.7	2.9	3.9	2.8	1.7	8.2	11.0	1.2	9.1	1.2	3.3	14
	ppb	0.28	0.44	0.56	0.43	0.57	0.42	0.25	1.2	1.6	0.18	1.4	0.18		
Chlorobenzene	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	62	NE
	ppb	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22		
Ethylbenzene	ug/m ³	7.5	14	5.3	6.2	3.4	3.8	2.8	3	2.7	2.90	2.7	3.8	1,100	NE
	ppb	1.7	3.3	1.2	1.4	0.79	0.88	0.64	0.7	0.63	0.66	0.61	0.88		
Bromoform	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	1.7	NE
	ppb	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10		
Styrene	ug/m ³	1.0	11	<1	1	0.76 TR	0.71 TR	<1	<1	<1	<1	<1	<1	<0.10	<0.10
	ppb	0.24	2.6	<0.24	0.24	0.18 TR	0.17 TR	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	1,100	4 ⁽²⁾
m,p-Xylenes	ug/m ³	30	34	20	24	13	15	10	11	11	11	10	16	730	NE
	ppb	6.9	7.9	4.7	5.5	3	3.5	2.4	2.6	2.4	2.5	2.4	3.7		
o-Xylenes	ug/m ³	9.3	11	6.6	7.8	4.5	5.2	3.7	4	3.5	3.8	3.6	4.3	730	NE
	ppb	2.2	2.6	1.5	1.8	1	1.2	0.85	0.92	0.82	0.87	0.83	0.99		
1,1,2,2-Tetrachloroethane	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	0.033	NE
	ppb	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15		
1,3-Dichlorobenzene	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	3.3	20 ⁽³⁾
	ppb	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17		
1,4-Dichlorobenzene	ug/m ³	1.2	1.3	1.1	1.5	0.78 TR	0.79 TR	<1	<1	<1	<1	<1	<1	0.031	20 ⁽³⁾
	ppb	0.2	0.22	0.19	0.26	0.13 TR	0.13 TR	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17		
1,2-Dichlorobenzene	ug/m ³	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	210	20 ⁽³⁾
	ppb	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17		

Notes:

1. <1.0 = Analyte not detected above laboratory reporting limit.

2. Volatile Organic Compounds analysis according to USEPA Method TO-14A.

3. NE = Not established.

4. PRG = USEPA Preliminary Remediation Goals for Ambient Air (micrograms per cubic meter).

5. Title 22 = CFR Title 22 Section 12705 - Specific Regulatory Levels Posing No Significant Risk (micrograms per day).

(1) inhalation dose

(2) styrene oxide

(3) para-dichlorobenzene

ATTACHMENT A

LABORATORY DATA SHEETS FOR AIR QUALITY SAMPLING



Performance Analytical Inc.

Air Quality Laboratory

A Division of Columbia Analytical Services, Inc.

An Employee Owned Company

RESULTS OF ANALYSIS

PAGE 1 OF 2

Client : Clayton Group Services

Client Sample ID : 630-1
PAI Sample ID : P9704037-001

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCAN Elite Date Analyzed : 10/06/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.1

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M³	REPORTING LIMIT µg/M³	RESULT ppb	REPORTING LIMIT ppb
74-87-3	Chloromethane	1.9	1.0	0.92	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	4.5	1.0	19	0.42
75-69-4	Trichlorofluoromethane	1.9	1.0	0.35	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	2.4	1.0	0.70	0.29
75-15-0	Carbon Disulfide	3.6	1.0	1.2	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	2.5	1.0	6.9	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	7.2	1.0	2.4	0.34
67-66-3	Chloroform	1.3	1.0	0.27	0.21
107-06-2	1,2-Dichloroethane	ND	1.0	ND	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	5.6	1.0	1.8	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 12/13/00



Performance Analytical Inc.

Air Quality Laboratory

A Division of Columbia Analytical Services, Inc.

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RESULTS OF ANALYSIS

PAGE 2 OF 2

Client : Clayton Group Services

Client Sample ID : 630-1
PAI Sample ID : P9704037-001

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCAN Elite Date Analyzed : 10/06/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

P_i I = 0.1

P_f I = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	ND	1.0	ND	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	1.5	1.0	0.36	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	35	1.0	9.3	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	1.9	1.0	0.28	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	7.5	1.0	1.7	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	1.0	1.0	0.24	0.24
1330-20-7	m,p-Xylenes	30	1.0	6.9	0.23
95-47-6	o-Xylene	9.3	1.0	2.2	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	1.2	1.0	0.20	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 12/13/00



Performance Analytical Inc.

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PAGE 1 OF 2

Client : Clayton Group Services

Client Sample ID : 630-2

PAI Sample ID : P9704037-002

Test Code : GC/MS EPA TO-14A

Date Sampled : 10/03/97

Analyst : Chris Parnell/Chris Casteel

Date Received : 10/06/97

Instrument : HP 5973/Tekmar AUTOCan Elite

Date Analyzed : 10/06/97

Matrix : Summa Canister

Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.1

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
74-87-3	Chloromethane	1.7	1.0	0.84	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	23	1.0	9.6	0.42
75-69-4	Trichlorofluoromethane	1.8	1.0	0.32	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	2.6	1.0	0.76	0.29
75-15-0	Carbon Disulfide	3.3	1.0	1.1	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	25	1.0	7.0	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	15	1.0	5.1	0.34
67-66-3	Chloroform	1.1	1.0	0.24	0.21
107-06-2	1,2-Dichloroethane	ND	1.0	ND	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	6.5	1.0	2.0	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 12/13/00



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Client : Clayton Group Services

Client Sample ID : 630-2
PAI Sample ID : P9704037-002

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCan Elite Date Analyzed : 10/06/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

P_i 1 = 0.1

P_f 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	ND	1.0	ND	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	1.8	1.0	0.43	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	81	1.0	22	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	3.0	1.0	0.44	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	14	1.0	3.3	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	11	1.0	2.6	0.24
1330-20-7	m,p-Xylenes	34	1.0	7.9	0.23
95-47-6	o-Xylene	11	1.0	2.6	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	1.3	1.0	0.22	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : R.C.

Date : 12/13/00



Performance Analytical Inc.

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RESULTS OF ANALYSIS

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Client : Clayton Group Services

Client Sample ID : 630-3
PAI Sample ID : P9704037-003

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCan Elite Date Analyzed : 10/06/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0
Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M³	REPORTING LIMIT µg/M³	RESULT ppb	REPORTING LIMIT ppb
74-87-3	Chloromethane	1.8	1.0	0.88	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	48	1.0	20	0.42
75-69-4	Trichlorofluoromethane	1.7	1.0	0.31	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	3.2	1.0	0.94	0.29
75-15-0	Carbon Disulfide	5.9	1.0	1.9	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	21	1.0	5.8	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	8.1	1.0	2.8	0.34
67-66-3	Chloroform	ND	1.0	ND	0.21
107-06-2	1,2-Dichloroethane	ND	1.0	ND	0.25
71-55-6	1,1,1-Trichloroethane	0.71 TR	1.0	0.13 TR	0.19
71-43-2	Benzene	4.9	1.0	1.5	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 12/13/00



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RESULTS OF ANALYSIS

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Client : Clayton Group Services

Client Sample ID : 630-3
PAI Sample ID : P9704037-003

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCAN Elite Date Analyzed : 10/06/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	ND	1.0	ND	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	1.5	1.0	0.37	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	27	1.0	7.1	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	2.2	1.0	0.54	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	3.7	1.0	0.56	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	5.3	1.0	1.2	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	ND	1.0	ND	0.24
1330-20-7	m,p-Xylenes	20	1.0	4.7	0.23
95-47-6	o-Xylene	6.6	1.0	1.5	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	1.1	1.0	0.19	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 12/13/00



Performance Analytical Inc.

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RESULTS OF ANALYSIS

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Client : Clayton Group Services

Client Sample ID : 630-4
PAI Sample ID : P9704037-004

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCan Elite Date Analyzed : 10/06/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

P_i 1 = 0.1

P_f 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
74-87-3	Chloromethane	2.3	1.0	1.1	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	26	1.0	11	0.42
75-69-4	Trichlorofluoromethane	1.8	1.0	0.32	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	2.4	1.0	0.71	0.29
75-15-0	Carbon Disulfide	3.7	1.0	1.2	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	22	1.0	6.0	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	5.9	1.0	2.0	0.34
67-66-3	Chloroform	0.73 TR	1.0	0.15 TR	0.21
107-06-2	1,2-Dichloroethane	ND	1.0	ND	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	5.2	1.0	1.6	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RCS

Date : 12/13/00



Performance Analytical Inc.

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RESULTS OF ANALYSIS

PAGE 2 OF 2

Client : Clayton Group Services

Client Sample ID : 630-4
PAI Sample ID : P9704037-004

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCAN Elite Date Analyzed : 10/06/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

P_i 1 = 0.1

P_f 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	0.94 TR	1.0	0.18 TR	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	+Methyl-2-pentanone	1.2	1.0	0.30	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	33	1.0	8.9	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	2.9	1.0	0.43	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	6.2	1.0	1.4	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	1.0	1.0	0.24	0.24
1330-20-7	m,p-Xylenes	24	1.0	5.5	0.23
95-47-6	o-Xylene	7.8	1.0	1.8	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	1.5	1.0	0.26	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : R.G.

Date : 12/15/00



Performance Analytical Inc.

Air Quality Laboratory

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RESULTS OF ANALYSIS

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Client : Clayton Group Services

Client Sample ID : 630-4

PAI Sample ID : P9704037-004 Dup

Test Code : GC/MS EPA TO-14A
Analyst : Chris Parnell/Chris Casteel
Instrument : HP 5973/Tekmar AUTOCan Elite
Matrix : Summa Canister

Date Sampled : 10/03/97
Date Received : 10/06/97
Date Analyzed : 10/06/97
Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.1

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT	REPORTING LIMIT	RESULT	REPORTING LIMIT
		µg/M³	µg/M³	ppb	ppb
74-87-3	Chloromethane	2.1	1.0	1.0	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	27	1.0	11	0.42
75-69-4	Trichlorofluoromethane	1.7	1.0	0.30	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	2.5	1.0	0.73	0.29
75-15-0	Carbon Disulfide	3.8	1.0	1.2	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	22	1.0	6.0	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	5.9	1.0	2.0	0.34
67-66-3	Chloroform	0.79 TR	1.0	0.16 TR	0.21
107-06-2	1,2-Dichloroethane	ND	1.0	ND	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	5.2	1.0	1.6	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RGS

Date : 12/13/00



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Client : Clayton Group Services

Client Sample ID : 630-4

PAI Sample ID : P9704037-004 Dup

Test Code : GC/MS EPA TO-14A

Date Sampled : 10/03/97

Analyst : Chris Parnell/Chris Casteel

Date Received : 10/06/97

Instrument : HP 5973/Tekmar AUTOCan Elite

Date Analyzed : 10/06/97

Matrix : Summa Canister

Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.1

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	0.91 TR	1.0	0.17 TR	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	1.3	1.0	0.32	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	34	1.0	9.0	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	2.8	1.0	0.42	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	6.1	1.0	1.4	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	1.1	1.0	0.26	0.24
1330-20-7	m,p-Xylenes	24	1.0	5.5	0.23
95-47-6	o-Xylene	7.8	1.0	1.8	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	1.6	1.0	0.26	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 12/13/00



Performance Analytical Inc.

Air Quality Laboratory

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RESULTS OF ANALYSIS

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Client : Clayton Group Services

Client Sample ID : 630-5
PAI Sample ID : P9704037-005

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCan Elite Date Analyzed : 10/06/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

Pi I = 0.1
Pf I = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M³	REPORTING LIMIT µg/M³	RESULT ppb	REPORTING LIMIT ppb
74-87-3	Chloromethane	1.9	1.0	0.93	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	29	1.0	12	0.42
75-69-4	Trichlorofluoromethane	1.7	1.0	0.31	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	1.9	1.0	0.56	0.29
75-15-0	Carbon Disulfide	1.3	1.0	0.42	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	17	1.0	4.6	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	5.2	1.0	1.8	0.34
67-66-3	Chloroform	ND	1.0	ND	0.21
107-06-2	1,2-Dichloroethane	ND	1.0	ND	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	3.9	1.0	1.2	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 12/13/00



Performance Analytical Inc.

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Client : Clayton Group Services

**Client Sample ID : 630-5
PAI Sample ID : P9704037-005**

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCan Elite Date Analyzed : 10/06/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

P_i 1 = 0.1

P_f 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	1.2	1.0	0.22	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	0.96 TR	1.0	0.23 TR	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	20	1.0	5.3	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	3.9	1.0	0.57	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	3.4	1.0	0.79	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	0.76 TR	1.0	0.18 TR	0.24
1330-20-7	m,p-Xylenes	13	1.0	3.0	0.23
95-47-6	o-Xylene	4.5	1.0	1.0	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	0.78 TR	1.0	0.13 TR	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RGT

Date : 12/13/00



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Client : Clayton Group Services

**Client Sample ID : 630-6
PAI Sample ID : P9704037-006**

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCan Elite Date Analyzed : 10/07/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

P_i 1 = 0.1

P_f 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
74-87-3	Chloromethane	1.9	1.0	0.94	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	44	1.0	18	0.42
75-69-4	Trichlorofluoromethane	1.7	1.0	0.31	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	2.8	1.0	0.81	0.29
75-15-0	Carbon Disulfide	3.0	1.0	0.96	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	18	1.0	4.9	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	5.4	1.0	1.9	0.34
67-66-3	Chloroform	ND	1.0	ND	0.21
107-06-2	1,2-Dichloroethane	ND	1.0	ND	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	4.1	1.0	1.3	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RCS

Date : 12/13/00



Performance Analytical Inc.

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RESULTS OF ANALYSIS

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Client : Clayton Group Services

**Client Sample ID : 630-6
PAI Sample ID : P9704037-006**

Test Code : GC/MS EPA TO-14A
Analyst : Chris Parnell/Chris Casteel
Instrument : HP 5973/Tekmar AUTOCan Elite
Matrix : Summa Canister

Date Sampled : 10/03/97
Date Received : 10/06/97
Date Analyzed : 10/07/97
Volume(s) Analyzed : 1.000 Liter(s)

P_i I = 0.1

P_f I = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	0.97 TR	1.0	0.18 TR	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	1.1	1.0	0.27	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	20	1.0	5.2	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	2.8	1.0	0.42	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	3.8	1.0	0.88	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	0.71 TR	1.0	0.17 TR	0.24
1330-20-7	m,p-Xylenes	15	1.0	3.5	0.23
95-47-6	o-Xylene	5.2	1.0	1.2	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	0.79 TR	1.0	0.13 TR	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : R.C.

Date : 12/13/00



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Client : Clayton Group Services

Client Sample ID : 630-7
PAI Sample ID : P9704037-007

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCan Elite Date Analyzed : 10/07/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.1

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M³	REPORTING LIMIT µg/M³	RESULT ppb	REPORTING LIMIT ppb
74-87-3	Chloromethane	1.8	1.0	0.87	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	72	1.0	30	0.42
75-69-4	Trichlorofluoromethane	2.0	1.0	0.35	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	1.4	1.0	0.41	0.29
75-15-0	Carbon Disulfide	1.0	1.0	0.32	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	15	1.0	4.2	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	6.9	1.0	2.3	0.34
67-66-3	Chloroform	ND	1.0	ND	0.21
107-06-2	1,2-Dichloroethane	ND	1.0	ND	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	3.2	1.0	1.0	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RC-

Date : 12/13/00



Performance Analytical Inc.

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RESULTS OF ANALYSIS

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Client : Clayton Group Services

Client Sample ID : 630-7
PAI Sample ID : P9704037-007

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCAN Elite Date Analyzed : 10/07/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.1

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	ND	1.0	ND	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	1.8	1.0	0.45	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	18	1.0	4.7	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	1.7	1.0	0.25	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	2.8	1.0	0.64	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	ND	1.0	ND	0.24
1330-20-7	m,p-Xylenes	10	1.0	2.4	0.23
95-47-6	o-Xylene	3.7	1.0	0.85	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	ND	1.0	ND	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 12/12/00



Performance Analytical Inc.

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RESULTS OF ANALYSIS

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Client : Clayton Group Services

Client Sample ID : 630-8
PAI Sample ID : P9704037-008

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCan Elite Date Analyzed : 10/07/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0
Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
74-87-3	Chloromethane	2.2	1.0	1.1	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	42	1.0	18	0.42
75-69-4	Trichlorofluoromethane	1.9	1.0	0.34	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	ND	1.0	ND	0.29
75-15-0	Carbon Disulfide	2.2	1.0	0.71	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	15	1.0	4.2	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	7.7	1.0	2.6	0.34
67-66-3	Chloroform	ND	1.0	ND	0.21
107-06-2	1,2-Dichloroethane	ND	1.0	ND	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	3.7	1.0	1.2	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RC

Date : 12/13/00



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RESULTS OF ANALYSIS

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Client : Clayton Group Services

**Client Sample ID : 630-8
PAI Sample ID : P9704037-008**

Test Code : GC/MS EPA TO-14A
Analyst : Chris Parnell/Chris Casteel
Instrument : HP 5973/Tekmar AUTOCan Elite
Matrix : Summa Canister

Date Sampled : 10/03/97
Date Received : 10/06/97
Date Analyzed : 10/07/97
Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M³	REPORTING LIMIT µg/M³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	1.9	1.0	0.36	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	2.1	1.0	0.52	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	19	1.0	5.2	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	8.2	1.0	1.2	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	3.0	1.0	0.70	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	ND	1.0	ND	0.24
1330-20-7	m,p-Xylenes	11	1.0	2.6	0.23
95-47-6	o-Xylene	4.0	1.0	0.92	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	ND	1.0	ND	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : R.G.

Date : 12/13/00



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Client : Clayton Group Services

**Client Sample ID : 630-9
PAI Sample ID : P9704037-009**

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCan Elite Date Analyzed : 10/07/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M³	REPORTING LIMIT µg/M³	RESULT ppb	REPORTING LIMIT ppb
74-87-3	Chloromethane	1.8	1.0	0.89	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	33	1.0	14	0.42
75-69-4	Trichlorofluoromethane	1.8	1.0	0.32	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	1.6	1.0	0.45	0.29
75-15-0	Carbon Disulfide	1.7	1.0	0.53	0.32
76-13-1	Trichlorotrifluoroethane	0.98 TR	1.0	0.13 TR	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	13	1.0	3.6	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	8.1	1.0	2.7	0.34
67-66-3	Chloroform	ND	1.0	ND	0.21
107-06-2	1,2-Dichloroethane	1.1	1.0	0.28	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	3.4	1.0	1.1	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 12/13/00



Performance Analytical Inc.

Air Quality Laboratory

A Division of Columbia Analytical Services, Inc.

An Employee Owned Company

RESULTS OF ANALYSIS

PAGE 2 OF 2

Client : Clayton Group Services

**Client Sample ID : 630-9
PAI Sample ID : P9704037-009**

Test Code : GC/MS EPA TO-14A
Analyst : Chris Parnell/Chris Casteel
Instrument : HP 5973/Tekmar AUTOCan Elite
Matrix : Summa Canister

Date Sampled : 10/03/97
Date Received : 10/06/97
Date Analyzed : 10/07/97
Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	2.1	1.0	0.40	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	2.1	1.0	0.51	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	16	1.0	4.2	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	11	1.0	1.6	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	2.7	1.0	0.63	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	ND	1.0	ND	0.24
1330-20-7	m,p-Xylenes	11	1.0	2.4	0.23
95-47-6	o-Xylene	3.5	1.0	0.82	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	ND	1.0	ND	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 11/13/00



Performance Analytical Inc.

Air Quality Laboratory

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RESULTS OF ANALYSIS

PAGE 1 OF 2

Client : Clayton Group Services

Client Sample ID : 630-10

PAI Sample ID : P9704037-010

Test Code : GC/MS EPA TO-14A

Date Sampled : 10/03/97

Analyst : Chris Parnell/Chris Casteel

Date Received : 10/06/97

Instrument : HP 5973/Tekmar AUTOCan Elite

Date Analyzed : 10/07/97

Matrix : Summa Canister

Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M³	REPORTING LIMIT µg/M³	RESULT ppb	REPORTING LIMIT ppb
74-87-3	Chloromethane	5.0	1.0	2.4	0.49
75-01-4	Vinyl Chloride	4.2	1.0	1.6	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	43	1.0	18	0.42
75-69-4	Trichlorofluoromethane	1.9	1.0	0.34	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	1.1	1.0	0.31	0.29
75-15-0	Carbon Disulfide	ND	1.0	ND	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	13	1.0	3.7	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	11	1.0	3.7	0.34
67-66-3	Chloroform	ND	1.0	ND	0.21
107-06-2	1,2-Dichloroethane	98	1.0	24	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	3.1	1.0	0.99	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RCS

Date : 12/13/00



Performance Analytical Inc.

Air Quality Laboratory

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RESULTS OF ANALYSIS

PAGE 2 OF 2

Client : Clayton Group Services

**Client Sample ID : 630-10
PAI Sample ID : P9704037-010**

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCAN Elite Date Analyzed : 10/07/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	1.1	1.0	0.20	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	1.9	1.0	0.46	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	21	1.0	5.5	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	1.2	1.0	0.18	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	2.9	1.0	0.66	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	ND	1.0	ND	0.24
1330-20-7	m,p-Xylenes	11	1.0	2.5	0.23
95-47-6	o-Xylene	3.8	1.0	0.87	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	ND	1.0	ND	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RGS

Date : 12/13/00



Performance Analytical Inc.

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RESULTS OF ANALYSIS

PAGE 2 OF 2

Client : Clayton Group Services

Client Sample ID : 630-11
PAJ Sample ID : P9704037-011

Test Code : GC/MS EPA TO-14A Date Sampled : 10/03/97
Analyst : Chris Parnell/Chris Casteel Date Received : 10/06/97
Instrument : HP 5973/Tekmar AUTOCan Elite Date Analyzed : 10/07/97
Matrix : Summa Canister Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.1

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT	REPORTING	RESULT	REPORTING
		$\mu\text{g}/\text{M}^3$	$\mu\text{g}/\text{M}^3$	ppb	ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	3.0	1.0	0.56	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	1.4	1.0	0.33	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	16	1.0	4.3	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	9.1	1.0	1.4	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	2.7	1.0	0.61	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	ND	1.0	ND	0.24
1330-20-7	m,p-Xylenes	10	1.0	2.4	0.23
95-47-6	o-Xylene	3.6	1.0	0.83	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	ND	1.0	ND	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RGS

Date : 12/13/00



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RESULTS OF ANALYSIS

PAGE 2 OF 2

Client : Clayton Group Services

Client Sample ID : 630-12
PAI Sample ID : P9704037-012

Test Code : GC/MS EPA TO-14A
Analyst : Chris Parnell/Chris Casteel
Instrument : HP 5973/Tekmar AUTOCan Elite
Matrix : Summa Canister

Date Sampled : 10/03/97
Date Received : 10/06/97
Date Analyzed : 10/07/97
Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0
Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	ND	1.0	ND	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	1.2	1.0	0.30	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	20	1.0	5.3	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	1.2	1.0	0.18	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	3.8	1.0	0.88	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	ND	1.0	ND	0.24
1330-20-7	m,p-Xylenes	16	1.0	3.7	0.23
95-47-6	o-Xylene	4.3	1.0	0.99	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	ND	1.0	ND	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 12/13/00



Performance Analytical Inc.

Air Quality Laboratory

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RESULTS OF ANALYSIS

PAGE 1 OF 2

Client : Clayton Group Services

Client Sample ID : 630-12

PAI Sample ID : P9704037-012 Dup

Test Code : GC/MS EPA TO-14A

Date Sampled : 10/03/97

Analyst : Chris Parnell/Chris Casteel

Date Received : 10/06/97

Instrument : HP 5973/Tekmar AUTOCAN Elite

Date Analyzed : 10/07/97

Matrix : Summa Canister

Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
74-87-3	Chloromethane	1.5	1.0	0.71	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	33	1.0	14	0.42
75-69-4	Trichlorofluoromethane	1.8	1.0	0.32	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	ND	1.0	ND	0.29
75-15-0	Carbon Disulfide	3.5	1.0	1.1	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	23	1.0	6.3	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	7.1	1.0	2.4	0.34
67-66-3	Chloroform	ND	1.0	ND	0.21
107-06-2	1,2-Dichloroethane	ND	1.0	ND	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	3.6	1.0	1.1	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 12/13/00



Performance Analytical Inc.

Air Quality Laboratory

A Division of Columbia Analytical Services, Inc.

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RESULTS OF ANALYSIS

PAGE 2 OF 2

Client : Clayton Group Services

Client Sample ID : 630-12

PAI Sample ID : P9704037-012 Dup

Test Code : GC/MS EPA TO-14A

Date Sampled : 10/03/97

Analyst : Chris Parnell/Chris Casteel

Date Received : 10/06/97

Instrument : HP 5973/Tekmar AUTOCan Elite

Date Analyzed : 10/07/97

Matrix : Summa Canister

Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0

Pf 1 = 3.0

D.F. = 1.20

CAS #	COMPOUND	RESULT µg/M ³	REPORTING LIMIT µg/M ³	RESULT ppb	REPORTING LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	ND	1.0	ND	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	1.2	1.0	0.30	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	20	1.0	5.2	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	1.3	1.0	0.20	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	3.8	1.0	0.87	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	ND	1.0	ND	0.24
1330-20-7	m,p-Xylenes	16	1.0	3.7	0.23
95-47-6	o-Xylene	4.3	1.0	0.99	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	ND	1.0	ND	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RC

Date : 12/13/00



Performance Analytical Inc.
Air Quality Laboratory

2951 Osborne Street
Canoga Park, California 91304
Phone 818 709 1139
Fax 818 709 2915

Chain of Custody Record Analytical Services Request

Client/Project Name CLAYTON ENVIRONMENTAL		Address/Phone <i>P.O. Box 9019 PLEASANTON CA 94566</i>		ANALYSES		PAI Project No. P9704037				
Project Location 630 29TH STREET		Client Project No. 70-97066.00								
Contact R-STAY	Sampler (Signature) <i>R-Stay</i>		P.O. No. N/C							
Sample Identification No.	Date	Time	Lab Sample No.	Type of Sample	<i>(RECEIVED)</i>	<i>(TESTED)</i>	<i>(REPORTED)</i>	Expected Turnaround Time	Remarks	
630-1	10/3/97	0900	-001	GRAIN	X			4 WEEKS	113 333	
630-2			-002						122 871	
630-3			-003						361 841	
630-4			-004						174 883	
630-5			-005						100 882	
630-6			-006						104 869	
630-7			-007						351 889	
630-8			-008					730-8	181 873	
630-9			-009						493 878	
630-10			-010						295 866	
630-11			-011						442 894	
630-12			-012						321 840	
Relinquished by: (Signature)		Date	Time	Received by: (Signature)			Date	Time		
Relinquished by: (Signature)		Date	Time	Received by: (Signature)			Date	Time		
Relinquished by: (Signature)		Date	Time	Received by: (Signature)			Date	Time		
Disposal Method				White Copy : Accompanies Samples						
Disposed by: (Signature)				Date	Time	Yellow Copy : Sampler				