RELEASE ABATEMENT MEASURE STATUS REPORT NO. 21

129 COMMERCIAL STREET MALDEN, MASSACHUSETTS

RELEASE TRACKING NUMBER 3-0362 October 2008

Prepared For:



National Grid 25 Research Drive Westborough, MA 01582

Prepared By:



Innovative Engineering Solutions, Inc. 25 Spring Street Walpole, Massachusetts 02081 (508) 668-0033

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Project Reviewer

Release Abatement Measure Status Report No. 21

129 Commercial Street Malden, Massachusetts 02148 DEP Release Tracking Number: 3-0362

This Release Abatement Measure (RAM) Status Report has been prepared by Innovative Engineering Solutions, Inc. (IESI) on behalf of Massachusetts Electric Company d/b/a/ National Grid in accordance with the requirements of the Massachusetts Contingency Plan (MCP) (310 CMR 40.0000). This RAM is being conducted at the 129 Commercial Street portion (Parcel B) of the former Malden manufactured gas plant (MGP) site (the "Site") in Malden, Massachusetts. The 129 Commercial Street property is currently occupied by a commercial bakery and is bounded to the north by Charles Street, to the east by Commercial Street, to the south by Adams Street, and to the west by the MBTA Orange Line commuter railway. The Massachusetts Department of Environmental Protection (DEP) assigned Release Tracking Number (RTN) 3-0362 to the Malden MGP Site. Figure 1 depicts the site locus and Figure 2 depicts the location of the property in relation to the disposal site boundary of the former MGP.

This RAM was initiated to address the potential migration of volatile organic compounds (VOCs) to indoor air at 129 Commercial Street. Although VOCs were historically detected in indoor air in the building at 129 Commercial Street, the detected concentrations did not constitute an imminent hazard for workers in the building, and were less than applicable occupational standards set by the US Occupational Safety and Health Administration (OSHA). However, remedial actions were implemented to reduce potential migration of VOCs to indoor air.

As indicated in the RAM Plan that was submitted to the DEP on July 2, 1998, the objective of the RAM was to reduce VOC concentrations in indoor air; this was initially attempted by sealing portions of the floor slab. The sealing of the floor was not completely successful in reducing indoor air concentrations, and the RAM was modified in April 1999 to include the installation of a sub-slab venting system (SSVS). The SSVS was installed in October 1999 and consists of five 2-inch diameter soil vapor extraction points installed horizontally through the foundation wall beneath the floor slab. The vapor extraction points extend approximately 5 feet beneath the building. These points are connected to a regenerative blower that removes vapors from beneath the floor slab and directs them through two granular activated carbon (GAC) drums (capacity of approximately 200 pounds each) for treatment. The blower and carbon drums are stored in a temporary building located east of the building along Commercial Street. Treated vapors are emitted through a 4-inch diameter vent pipe to the atmosphere. Figure 3 presents the locations of the extraction points and the system enclosure.

The content of this report has been structured to address the specific information requirements set forth in 310 CMR 40.0445 (2)(a) through (e). This report was submitted electronically to the DEP via the eDEP website; a copy of the RAM Transmittal Form (BWSC-106) is included in Appendix A. In addition, in accordance with DEP requirements, the Remedial Monitoring Report (RMR; forms BWSC-106 A/B) was submitted electronically via the eDEP website; a copy of the RMR is included in Appendix A. This RAM Status Report details on-going operation and maintenance of the sub-slab venting system, and summarizes monitoring data collected from April 1, 2008 through September 30, 2008.

310 CMR 40.0445 (2)(a) The status of response operations:

The SSVS is monitored monthly as part of an ongoing operation and maintenance (O&M) schedule. Total VOC levels in influent and effluent vapor from the off-gas control device (sub-slab venting treatment unit) are measured during these visits with a photoionization detector (PID) calibrated to a 100 parts per million (ppm) isobutylene standard to respond as benzene. The results are summarized in Table 1 and discussed below.

On April 10, 2008, the existing 3 horsepower regenerative blower and GAC drum were replaced with a 2 horsepower regenerative blower and two vapor phase GAC drums, each containing approximately 200 pounds of GAC.

On April 16, 2008, indoor air samples were collected from five locations (identified as Site 4 through Site 8) inside the 129 Commercial Street building, one location (identified as Site 2) outside the 129 Commercial Street building and from the influent (identified as Sys-Inf) to the SSVS. The sample collected at Site 2 represents background conditions (i.e. outside air). A duplicate sample was collected at Site 7. A sample was not collected from Site 11 because one of the canisters shipped form the laboratory was not under vacuum and was unable to be used. The sample locations are shown on Figure 3.

The samples were collected in laboratory provided 6 liter summa canisters. Each canister was outfitted with a laboratory calibrated flow control valve to allow an 8-hour sample collection rate. The canisters were placed in the sample locations, the valve opened, and the sample was collected for approximately 6 to 8 hours. Upon completion of the collection period, the canisters were retrieved and submitted under chain of custody to Columbia Analytical Services of Simi Valley, California for analysis of Air Phase Hydrocarbons (APH) via the DEP Method and styrene via EPA Method TO-15. The results are summarized in Table 2 and further discussed below.

310 CMR 40.0445 (2)(b) Any significant new site information or data:

SSVS data

O&M visits have been conducted regularly throughout the reporting period. The monitoring data collected during this period are summarized on Table 1 and discussed below.

Vacuum conditions are monitored with fixed vacuum gauges on the influent piping prior to the blower and on the knockout drum. A portable vacuum gauge is used to periodically measure vacuum at the individual extraction points (EP-1 through EP-5). During this reporting period, vacuum at extraction points EP-1 through EP-5 ranged from 0.1 inch to 2.0 inches of water; vacuum at the blower ranged from 8.7 inches to 10 inches of water; vacuum at the knockout drum ranged from 4.1 inches and 6.5 inches of water; and discharge pressure ranged from 15 inches and 17 inches of water during this period. These measurements are generally consistent with other recent vacuum data for this system (and other similar systems), except for the discharge pressure, which was elevated. After reducing the size of the blower and replacing the GAC drums, the backpressure was greatly reduced and the airflow through the system was increased.

VOC levels are screened with a PID at 3 locations along the vapor stream: Influent (pre-GAC), Effluent-1 (post-GAC vessel 1) and Effluent-2 (post-GAC vessel 2). PID readings at the influent were consistent with background levels (0.0 ppm) as measured throughout the reporting period. PID readings at Effluent-1 and Effluent-2 were also consistent with background levels (0.0 ppm) throughout the reporting period.

Air flow in and out of the system is measured with an air velocity meter. During this reporting period, the influent air flow rate ranged from 89 cubic feet per minute (cfm, not adjusted for temperature and pressure) to 113 cfm; the effluent flow rate ranged from 88.5 cfm to 98 cfm. Note that the air flow rate has nearly doubled since the blower and GAC were replaced.

Indoor Air Sampling Data

Table 2 presents a summary of the results of laboratory analysis conducted on the air samples collected on April 16, 2008, as well as the results from previous sampling events. The complete laboratory data report for the air samples is included as Appendix B. For this sampling round, the air samples were analyzed for APH by the DEP Method and styrene (by EPA Method TO-15); for prior sampling rounds, the air samples were analyzed for VOCs by EPA Method TO-15. Note that APH analysis includes 8 VOCs (benzene, ethylbenzene, toluene, naphthalene, xylenes,

3-butadiene, methyl tert-butyl ether, and 2-methylnaphthalene), and three APH fractions (C_5 to C_8 aliphatics, C_9 to C_{12} aliphatics, and C_9 to C_{10} aromatics). The VOCs 3-butadiene, methyl tert-butyl ether, and 2-methylnaphthalene and the APH fractions are not included in the EPA Method TO-15 compound list; and this sampling event is the first time these compounds have been analyzed for. In addition, the APH analysis does not include styrene, which has been detected in the previous sampling events; therefore, we included analysis for this compound by EPA Method TO-15.

The results of the analysis indicate that the concentrations of the VOCs were comparable to previous events. Of the additional APH analytes, only the fractions C_5 to C_8 aliphatics, C_9 to C_{12} aliphatics were detected. Similar to previous sampling events, the sample collected from Site 8 had elevated detection limits which have been attributed to ethanol interference from the fermentation process at the bakery. The elevated detection limits were not observed at Sites 6 and 7 as they have been in the past.

The total concentration of APH compounds in the Sys-Inf sample (which was collected prior to treatment of the vapors by GAC) was 797.4 ug/m³ or roughly 0.7 ppm.

Risk Characterization Update

The Risk Characterization included in the Phase III Remedial Action Plan (Haley & Aldrich, 2003) reports a condition of No Significant Risk for workers inside the building at 129 Commercial Street. The only current exposure pathway for these workers is the inhalation of indoor air. The data used for the Risk Characterization included indoor air data collected while the SSVS was operational and it was assumed in the Class C Response Action Outcome (Haley & Aldrich, 2005) that the SSVS remain operational to maintain a condition of No Significant Risk.

IESI updated the human health risk characterization for these workers using the data collected since 2004 (including the most recent sampling event). In order to streamline this effort, IESI used the formulas and data assumptions from the DEP "Short Forms for Human Health Risk Assessment under the MCP" updated as of February 2007. Table 3 presents the data and risk assumptions used.

The exposure point concentrations (EPCs) for each of the compounds (identified as "[OHM]_{air}" on Table 3) were calculated using an average of all the detected concentrations for samples collected inside the building from February 2004 through April 2008. Sample results that were below the detection limits were not included in the EPC. For ease of reference, various statistics for the sample dataset (i.e., the number of detections, the number of samples, the maximum detected concentration, minimum detected concentration and median detected concentration) are also included on Table 3.

We considered 2 separate exposure scenarios for inhalation of the indoor air. The first scenario was based on the exposure assumptions for a residential occupant, and the DEP standard "short form" exposure parameters used in the updated risk characterization were not adjusted. The second scenario was based on the exposure assumptions for a worker/commercial occupant, and the Exposure Frequency (EF) and the Exposure Duration (ED) values were modified accordingly. The EF value, which is typically 1 and represents an exposure frequency of 24 hours per day, was adjusted to 0.33 to represent a daily 8 hour shift for the employees (i.e., 8 hours per shift divided by 24 hours per day). The ED value, which is typically 1 and represents 7 days per week of exposure, was adjusted to 0.71 to represent 5 days of exposure per week (i.e., 5 divided by 7).

The Estimated Lifetime Cancer Risk (ELCR) for the residential exposure scenario was calculated to be 8E-06; the ELCR for the worker scenario was calculated to be 2E-06. These calculated ELCRs are both below the MCP limit of 1E-05. The Hazard Index (HI) for the residential exposure scenario was calculated to be 0.8; the HI for the worker scenario was calculated to be 0.2. Both calculated HI values are both below the MCP limit of 1.

IESI also compared the 90th Upper Percentile Value (UPV) of Typical Indoor Air Concentrations presented in the Draft DEP Policy Entitled "Typical Indoor Air Concentrations - Technical Update Policy #08-XXX" to the EPCs and to the maximum detected concentrations. According to the Draft DEP Policy,

"This document updates MassDEP's list of values representing chemical concentrations that may typically be present in indoor air from sources such as building materials, household products, and ambient air. These "Typical Indoor Air Concentrations," developed using recent studies of indoor air chemical concentrations measured in residences, may be used as one line of evidence in evaluating potential vapor intrusion pathways from a disposal site."

The EPC for only one compound, styrene, exceeds the Draft 90th UPV values typical of <u>residential</u> indoor air. Also, the maximum detected concentrations for only 2 compounds, styrene and toluene, exceeds the Draft 90th UPV values typical of <u>residential</u> indoor air. Note that styrene has only been detected twice in 70 samples, and has not been detected since 2005, and that the concentration of toluene has exceeded the Draft 90th UPV value on only two occasions, both in 2004. The purpose of this comparison to residential values is to provide further evidence of the very low concentrations of VOCs in indoor air.

310 CMR 40.0445 (2)(c) Details of and/or plans for the management of Remediation Waste, Remedial Wastewater, and/or Remedial Additives:

One drum (approximately 200 pounds) of GAC was removed from the site under a Uniform Hazardous Waste Manifest on April 10, 2008. No other remediation waste was generated or disposed of during this reporting period. Approximately 7,955 pounds of spent carbon have been removed from the site since start-up of the sub-slab ventilation system in 1999.

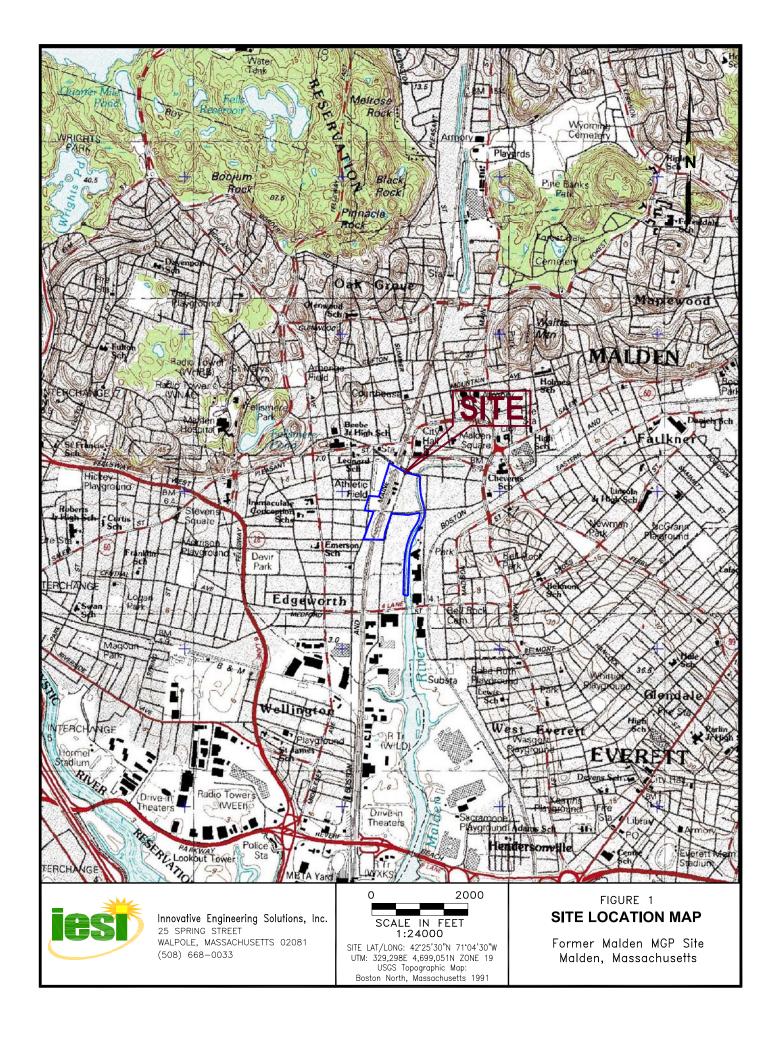
310 CMR 40.0445 (2)(d) Any other information that the Department during its review and evaluation of a Status Report determines to be necessary to complete said Status Report, in view of site specific circumstances and conditions; and:

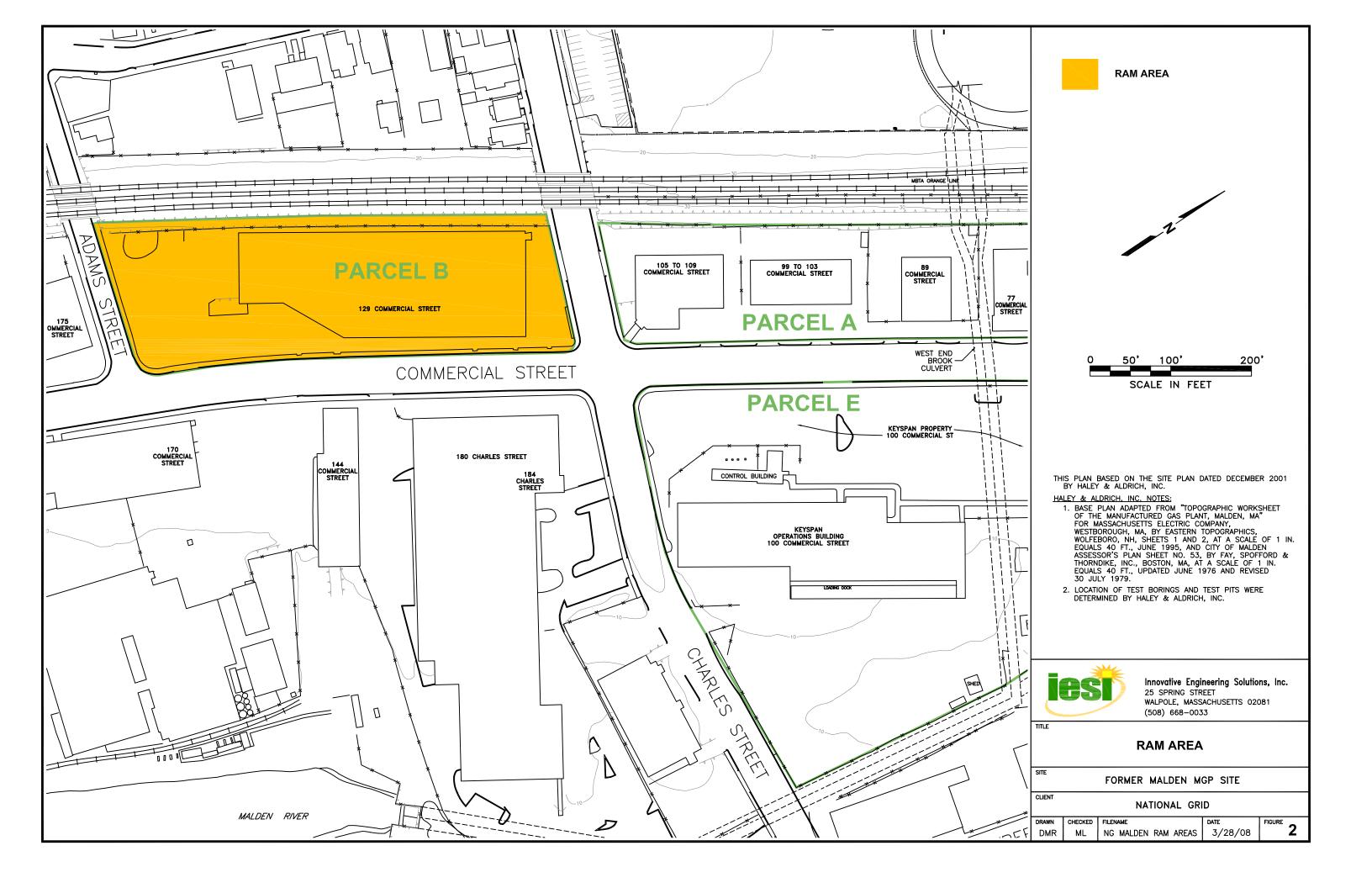
The DEP has not required any additional information

310 CMR 40.0445 (2)(e) An LSP Opinion as to whether the Release Abatement Measure is being conducted in conformance with the RAM Plan and any conditions of approval established by the Department.

Having reviewed the requirements of the RAM Plan and the response actions completed to date, we are of the opinion that the RAM is being conducted in accordance with the RAM Plan and the DEP Conditional Approval letters dated June 19, 1999 and July 27, 1999. DEP approval was necessary because at that time there was an ongoing Immediate Response Action (IRA) at the 100 Commercial Street property which is separate from the 129 Commercial Street property but part of larger Site RTN 3-0362. There are currently no ongoing IRAs at this location.

If you require additional information or have any questions regarding this status report, please contact Michael S. Lotti, LSP of IESI at (508) 668-0033 (x 231).





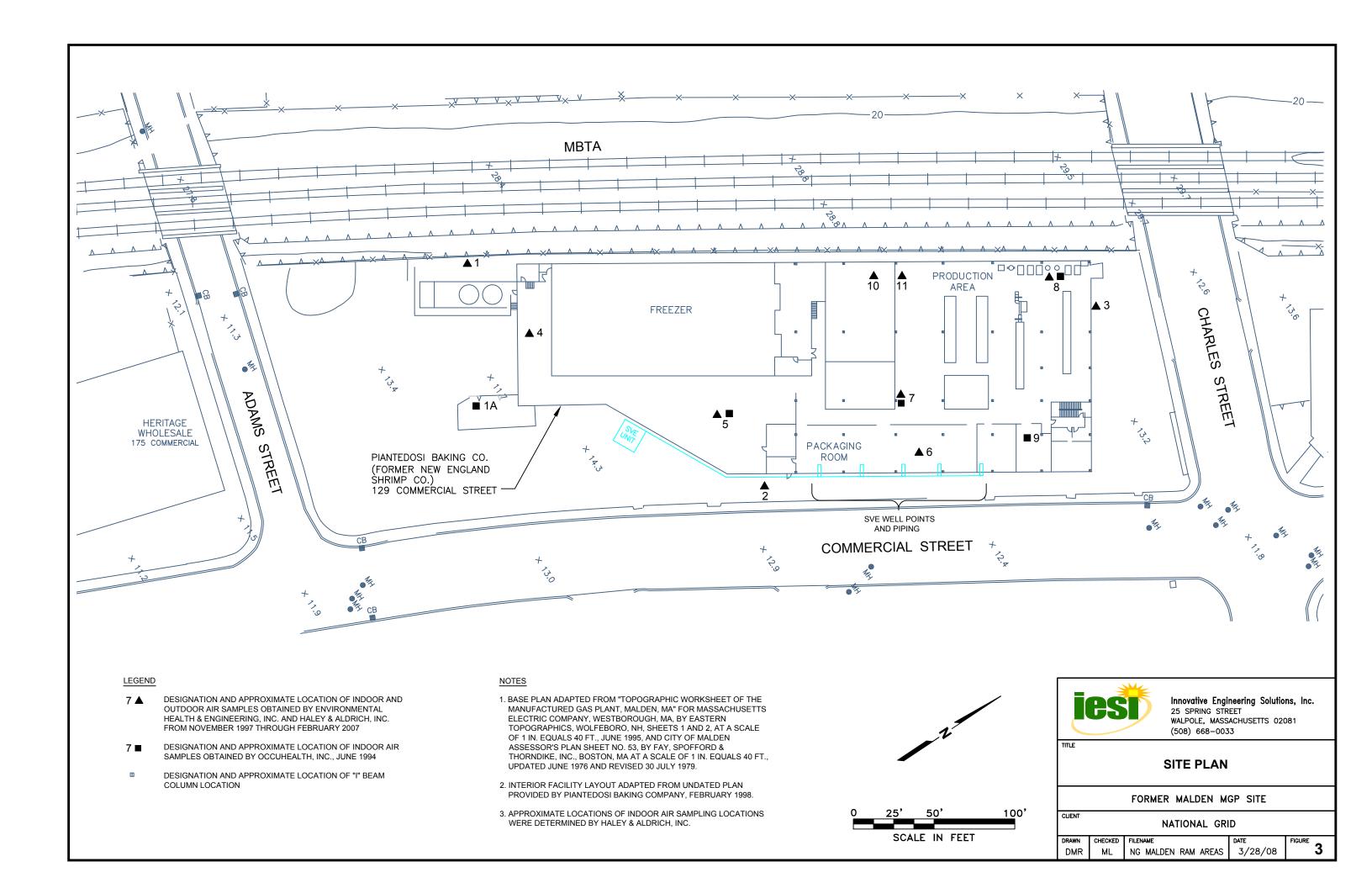


Table 1
Sub-Slab Venting System Monitoring Data
129 Commercial Street
Malden, Massachusetts

Monitoring	Total	VOC Concen	trations				elocity ft./min)	Systen	n Vacuum (in	. water)	Vacu	um at Ext	traction P	oints (in. v	water)
Date	Influent (ppm)	Effluent - 1 (ppm)	Effluent - 2 (ppm)	Outdoor Ambient Air Temp. (°F)	Outlet Vapor Temp. (°F)	Influent	Effluent	Blower	Knockout Drum	Discharge	EP-1	EP-2	EP-3	EP-4	EP-5
9-Oct-07	-	-	-	60	-	-	-	-	-	-		R	estart syste	em	
21-Oct-07	-	-	-	-	-	-	-	-	_	-			System of		
22-Oct-07	-	-	-	65	-	-	-	-	_	-		R	estart syste	em	
23-Oct-07	-	-	-	65	130	33	110	10	5	50	-	-	-	-	-
30-Oct-07	0.0	0.0	0.0	60	130	29	110	10	5	50	-	-	-	-	-
18-Nov-07	-	-	-	-	-	-	-	-	-	-			System of	f	
19-Nov-07	-	-	-	35	70	-	-	4	2	55		Restart system			
24-Nov-07	-	-	-	-	-	-	-	-	-	-		System off			
27-Nov-07	-	-	-	40	-	-	-	-	-	-		R	estart syste	em	
28-Nov-07	0.0	0.0	0.0	50	110	31	114	10	5	52	-	-	-	-	-
3-Dec-07											System o	perational,	remove or	ne GAC ve	ssel
17-Jan-08	0.0	-	0.0	34	84	65	157	10.5	2.8	40	1.7	2.1	0.0	0.0	2.5
18-Feb-08	0.0	-	0.0	64	90	60	140	9	2.7	41	2.1	2.3	0.0	0.0	2.4
28-Mar-08	0.0	-	0.0	37	96	59	145	8.2	1.6	47	0.0	1.5	0.0	0.0	1.6
10-Apr-08	0.0	0.0	0.0	65	88	113	98	8	4.1	18	1.9	1.6	1.6	0.4	1.6
10-May-08	0.0	0.0	0.0	60	80	97	95	9	5.8	17	1.6	1.8	2.0	0.1	1.5
10-Jun-08	0.0	0.0	0.0	95	104	89	93	8.7	5	16.3	1.8	1.8	1.6	0.3	1.8
16-Jun-08	(Reactivate	System after p	ower outage)												
7-Jul-08	0.0	0.0	0.0	88	100	89	88.5	8.7	5	16.2	1.5	1.5	1.5	0.1	1.4
12-Aug-08	0.0	0.0	0.0	85	94	94	91	9.6	5.8	16.2	1.8	1.9	1.4	0.3	1.3
8-Sep-08	0.0	0.0	0.0	80	100	90	86	10	6.5	15	1.2	1.8	1.2	1.2	1.6

Notes & Abbreviations:

IESI began operation of the SSVS system in December 2007

cubic ft./min = Cubic feet per Minute (actual in field measurement, not adjusted for temperature and pressure)

in. water = Inches of water pressure/vacuum

ppm = Parts per million as measured with a PID

ug/l = Micrograms per liter (roughly equal to 1 part per billion)

°F = Degrees Fahrenheit

- = Not Available/Not Measured

ND = Non Detect; method detection limit < 1ug/L



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Table 2
Indoor Air Sample Results
129 Commercial Street
Malden, MA

Sample Results (Results listed in ug/m³)

Date	ANALYTE	Site	e 2	Site	4	Site	2.5	Site		Site	`	Site 7	Site	e 8	Site	10	Site	11	Sys-	Inf
Dute		Outs		Site		, DICC		Bitt		, Site		Duplicate	, DICC		Site	10	Site		SJS 2	
		Result		Result	DL	Result	DL	Result	DL	Result	DL	2 up weare	Result	DL	Result	DL	Result	DL	Result	DL
12-Feb-04	Benzene	20.8		ND	1.7	ND	1.7	ND	8.6	ND	12.8		ND	18.5	ND	20.1				
06-May-04	Benzene	ND	1.5	ND	1.9	1.7		ND	1.9	ND	1.8		ND	2.1	ND	1.9				
06-Aug-04	Benzene	ND	1.8	ND	3.5	ND	3.4	ND	33	ND	34		ND	3.5	ND	35				
26-Oct-04	Benzene	2.2		ND	1.7	ND	1.5	ND	1.8	1.7			ND	1.5			1.9			
13-Jan-05	Benzene	3.8		2.6		2.8		2.8		2.8			3.5				3.4			
27-Apr-05	Benzene	ND	1.5	ND	1.5	ND	2	ND	14	ND	13		ND	31			ND	42		
03-Aug-05	Benzene	ND	1.8	ND	1.4	ND	3.6	ND	10	ND	13						ND	11		
20-Oct-05	Benzene	ND	1.6	ND	1.5	ND	1.6	ND	5.4	ND	5.9		ND	5.9			ND	6		
19-Jan-06	Benzene	ND	1.6	ND	2	ND	1.4	ND	1.5	ND	2.5		ND	1.8			ND	1.7		ļ
19-Apr-06	Benzene	ND	1.5	ND	1	ND	1.2	ND	24	ND	20		ND	1.7						
28-Feb-07	Benzene	2.7		1.9		2.6		ND	9.1	ND	28		ND	53			ND	53		
16-Apr-08	Benzene	1.4	0.87	1.4	0.61	1.1	0.82	ND	1.7	1.2	0.87	1.3 0.75	ND	15					2.4	0.96
12-Feb-04	Ethylbenzene	16.9		ND	1.6	ND	1.7	ND	8.7	ND	13		ND	18.7	ND	20				
06-May-04	Ethylbenzene	ND	1.5	ND	1.9	1.7		ND	1.9	2			ND	2.1	ND	1.9				
06-Aug-04	Ethylbenzene	ND	1.8	ND	3.5	ND	3.4	ND	33	ND	34		ND	3.5	ND	35				
26-Oct-04	Ethylbenzene	ND	1.4	ND	1.7	ND	1.5	ND	1.8	ND	1.6		ND	1.5			ND	1.6		
13-Jan-05	Ethylbenzene	2.8		2.7		3.5		1.5		2.3			2.4				2.6			
27-Apr-05	Ethylbenzene	ND	1.5	ND	1.5	ND	2	ND	14	ND	13		ND	31			ND	42		
03-Aug-05	Ethylbenzene	ND	1.8	1.7		ND	3.6	ND	10	ND	13						ND	11		
20-Oct-05	Ethylbenzene	ND	1.6	ND	1.5	ND	1.6	ND	5.4	ND	5.9		ND	5.9			ND	6		
19-Jan-06	Ethylbenzene	ND	1.6	ND	2	ND	1.4	ND	1.5	ND	2.5		ND	1.8			ND	1.7		
19-Apr-06	Ethylbenzene	ND	1.5	1.3		1.5		ND	24	ND	20		ND	1.7						
28-Feb-07	Ethylbenzene	ND	1.7	1.8		1.6		ND	9.1	ND	28		ND	53			ND	53		ļ
16-Apr-08	Ethylbenzene	ND	0.87	0.82	0.61	ND	0.82	ND	1.7	1.1	0.87	1.2 0.75	ND	15					12	0.96
12-Feb-04	m-&p-xylenes	52.1		2		3		ND	8.7	ND	13		ND	18.7	ND	20				
06-May-04	m-&p-xylenes	2.9		3.5		4.2		4		7.6			5.4		6.4					
06-Aug-04	m-&p-xylenes	2.9		3.5		ND	3.4	ND	33	ND	34		ND	3.5	ND	35				ļ
26-Oct-04	m-&p-xylenes	3.6		3.2		4.4		3.1		4			2.9				3.5			
13-Jan-05	m-&p-xylenes	8.2		8		11		3.6		6			6.4				6.9			
27-Apr-05	m-&p-xylenes	ND	1.5	1.7		ND	2	ND	14	ND	13		ND	31			ND	42		
03-Aug-05	m-&p-xylenes	2.8		5		5.8		ND	10	ND	13						ND	11		
20-Oct-05	m-&p-xylenes	1.6		1.8		1.9		ND	5.4	ND	5.9		ND	5.9			ND	6		
19-Jan-06	m-&p-xylenes	ND	1.6	2.6		2.2		2.8		3.4			2.1				2.7			
19-Apr-06	m-&p-xylenes	ND	3	3.8		4.1		ND	48	ND	41		ND	3.4						
28-Feb-07	m-&p-xylenes	3.5		6.7		4.6		ND	9.1	ND	28		ND	53			ND	53		
16-Apr-08	m-&p-xylenes	2.0	1.7	2.3	1.2	1.9	1.6	ND	3.3	2.2	1.7	2.4 1.5	ND	29					35	1.9



Table 2
Indoor Air Sample Results
129 Commercial Street
Malden, MA

Sample Results (Results listed in ug/m³)

Date	ANALYTE	Site	2	Site	4	Site	2.5	Site		Site	_ `	Site 7	Site	- 8	Site	10	Site	11	Svs-l	Inf
2		Outs		5100		510		5100		510		Duplicate	5100		5100		5100		2,5	
		Result		Result	DL	Result	DL	Result	DL	Result	DL	2 up weare	Result	DL	Result	DL	Result	DL	Result	DL
12-Feb-04	Naphthalene	2		ND	1.7	ND	1.7	ND	8.9	ND	13.1		ND	18.3	ND	19.9				
06-May-04	Naphthalene	ND	1.5	ND	1.9	ND	1.6	ND	1.9	ND	1.8		ND	2.1	ND	1.9				
06-Aug-04	Naphthalene	ND	1.8	ND	3.5	ND	3.4	ND	33	ND	34		ND	3.5	ND	35				
26-Oct-04	Naphthalene	ND	1.4	ND	1.7	ND	1.5	ND	1.8	ND	1.6		ND	1.5			ND	1.6		
13-Jan-05	Naphthalene	ND	1.4	ND	1.3	ND	1.5	ND	1.2	ND	1.2		ND	1.4			ND	1.8		
27-Apr-05	Naphthalene	ND	1.5	ND	1.5	ND	2	ND	14	ND	13		ND	31			ND	42		
03-Aug-05	Naphthalene	ND	1.8	ND	1.4	ND	3.6	ND	10	ND	13						ND	11		
20-Oct-05	Naphthalene	ND	1.6	ND	1.5	ND	1.6	ND	5.4	ND	5.9		ND	5.9			ND	6		
19-Jan-06	Naphthalene	ND	1.6	ND	2	ND	1.4	ND	1.5	ND	2.5		ND	1.8			ND	1.7		
19-Apr-06	Naphthalene	ND	1.5	ND	1	ND	1.2	ND	24	ND	20		ND	1.7						
28-Feb-07	Naphthalene	ND	1.7	ND	1.4	ND	1.2	ND	9.1	ND	28		ND	53			ND	53		
16-Apr-08	Naphthalene	ND	0.87	ND	0.61	ND	0.82	ND	1.7	ND	0.87	ND 0.75	ND	15					1.4	0.96
12-Feb-04	o-xylenes	18.7		ND	1.6	ND	1.7	ND	8.7	ND	13		ND	18.7	ND	20				
06-May-04	o-xylenes	ND	1.5	ND	1.9	1.6		ND	1.9	3			2.2		2.6					
06-Aug-04	o-xylenes	ND	1.8	ND	3.5	ND	3.4	ND	33	ND	34		ND	3.5	ND	35				ļ
26-Oct-04	o-xylenes	ND	1.4	ND	1.7	ND	1.5	ND	1.8	ND	1.6		ND	1.5			ND	1.6		
13-Jan-05	o-xylenes	2.8		2.2		2.6		1.3		1.7			2.1				2.1			
27-Apr-05	o-xylenes	ND	1.5	ND	1.5	ND	2	ND	14	ND	13		ND	31			ND	42		ļ
03-Aug-05	o-xylenes	ND	1.8	ND	1.4	ND	3.6	ND	10	ND	13						ND	11		
20-Oct-05	o-xylenes	ND	1.6	ND	1.5	ND	1.6	ND	5.4	ND	5.9		ND	5.9			ND	6		ļ
19-Jan-06	o-xylenes	ND	1.6	ND	2	ND	1.4	ND	1.5	ND	2.5		ND	1.8			ND	1.7		ļ
19-Apr-06	o-xylenes	ND	1.5	ND	1	ND	1.2	ND	24	ND	20		ND	1.7						
28-Feb-07	o-xylenes	ND	1.7	1.5		1.5		ND	9.1	ND	28		ND	53			ND	53		ļ
16-Apr-08	o-xylenes	ND	0.87	0.87	0.61	ND	0.82	ND	1.7	ND	0.87	0.98 0.75	ND	15					8.6	0.96
12-Feb-04	Styrene	2.1		ND	1.7	ND	1.7	ND	8.5	ND	12.8		ND	18.7	ND	20				
06-May-04	Styrene	ND	1.5	ND	1.9	ND	1.6	ND	1.9	ND	1.8		ND	2.1	2.8					
06-Aug-04	Styrene	ND	1.8	ND	3.5	ND	3.4	ND	33	ND	34		ND	3.5	ND	35				
26-Oct-04	Styrene	ND	1.4	ND	1.7	ND	1.5	ND	1.8	ND	1.6		ND	1.5			ND	1.6		
13-Jan-05	Styrene	ND	1.4	ND	1.3	ND	1.5	ND	1.2	ND	1.2		1.5				ND	1.8		
27-Apr-05	Styrene	ND	1.5	ND	1.5	ND	2	ND	14	ND	13		ND	31			ND	42		
03-Aug-05	Styrene	ND	1.8	ND	1.4	ND	3.6	ND	10	ND	13						ND	11		
20-Oct-05	Styrene	ND	1.6	ND	1.5	ND	1.6	ND	5.4	ND	5.9		ND	5.9			ND	6		
19-Jan-06	Styrene	ND	1.6	ND	2	ND	1.4	ND	1.5	ND	2.5		ND	1.8			ND	1.7		
19-Apr-06	Styrene	ND	1.5	ND	1	ND	1.2	ND	24	ND	20		ND	1.7						
28-Feb-07	Styrene	ND	1.7	ND	1.4	ND	1.2	ND	9.1	ND	28		ND	53			ND	53		
16-Apr-08	Styrene	ND	1.7	ND	1.2	ND	1.6	ND	3.3	ND	1.7	ND 1.5	ND	29					13	1.9



Table 2
Indoor Air Sample Results
129 Commercial Street
Malden, MA

Sample Results (Results listed in ug/m³)

Date	ANALYTE	Sit	. 1	Site	. 1	Site	. =	Site	_	Site	,	Site 7	_	Site	0	Site	10	Site	11	Svs-	T.,.f
Date	ANALITE			SIU	: 4	SIU	: 5	Site	: 0	510	e /		_	Site	0	Site	10	Site	11	Sys-	1111
		Out	side									Duplica									
		Result	DL	Result	DL	Result	DL	Result	DL	Result	DL			Result	DL	Result	DL	Result	DL	Result	DL
12-Feb-04	Toluene	71.6		4.5		5.3		56.5		ND	12.8			ND	18.5	ND	20				
06-May-04	Toluene	85		33		72		18		13				8.7		11					
06-Aug-04	Toluene	5.1		9		7.5		ND	33	ND	34			3.6		ND	35				
26-Oct-04	Toluene	6.8		6.7		9		13		6.9				5.1				6.6			
13-Jan-05	Toluene	18		16		16		15		10				12				13			
27-Apr-05	Toluene	2.9		4.7		7.6		ND	14	ND	13			ND	31			ND	42		
03-Aug-05	Toluene	4.4		7.8		7.6		11		ND	13							ND	11		
20-Oct-05	Toluene	3.9		3.2		3.6		9		ND	5.9			ND	5.9			ND	6		
19-Jan-06	Toluene	2.4		6.4		4.2		13		5				3.7				4			
19-Apr-06	Toluene	3.8		5.2		4.2		ND	24	ND	20			2.5							
28-Feb-07	Toluene	5.4		4.2		5.7		ND	9.1	ND	28			ND	53			ND	53		
16-Apr-08	Toluene	4.8	0.87	5.8	0.61	4.3	0.82	5.6	1.7	4.3	0.87	14 0.	.75	ND	15					31	0.96
16-Apr-08	1,3-Butadiene	ND	0.87	ND	0.61	ND	0.82	ND	1.7	ND	0.87	ND 0.	.75	ND	15					ND	0.96
16-Apr-08	Methyl tert-Butyl Ether	ND	0.87	ND	0.61	ND	0.82	ND	1.7	ND	0.87	ND 0.	.75	ND	15					ND	0.96
16-Apr-08	2-Methylnaphthalene	ND	0.87	ND	0.61	ND	0.82	ND	1.7	ND	0.87	ND 0.	.75	ND	15					ND	0.96
16-Apr-08	C5 - C8 Aliphatic Hydrocarbons	ND	69	70	48	ND	66	ND	130	91	69	110	60	ND	1200					520	77
16-Apr-08	C9 - C12 Aliphatic Hydrocarbons	24	17	18	12	27	16	71	33	33	17	48 1	15	ND	290		•		•	140	19
16-Apr-08	C9 - C10 Aromatic Hydrocarbons	ND	17	ND	12	ND	16	ND	33	ND	17	ND 1	15	ND	290					34	19

NOTES AND ABBREVIATIONS:

All results n micrograms per cubic meter (ug/m³)
ND: compound not detected above detection limit noted

DL: Detection limit for analyte



Table 3 Summary of Indoor Air Data and Inhalation Risk Estimates 129 Commercial Street Malden, MA

						An	alytical Da	ta (ug/m³)					
	Benzene	Ethylbenzene	m-&p-xylenes	Naphthalene	o-xylenes	Styrene	Toluene	1,3-Butadiene	Methyl tert- Butyl Ether	2-Methyl- naphthalene	C5 - C8 Aliphatic Hydrocarbons	C9 - C12 Aliphatic Hydrocarbons	C9 - C10 Aromatic Hydrocarbons
[OHM] _{air} ¹	2.2	1.9	4.1	NA	1.9	2.2	10.8	NA	NA	NA	90.3	39.4	NA
Detects	15	16	40	0	14	2	48	0	0	0	3	5	0
Samples	70	70	70	70	70	70	70	6	6	6	6	6	6
Max	3.5	3.5	11.0	0.0	3.0	2.8	72.0	0.0	0.0	0.0	110.0	71.0	0.0
Min	1.1	0.8	11.0	0.0	0.9	1.5	2.5	0.0	0.0	0.0	70.0	18.0	0.0
Median	1.9	1.7	3.5	NA	1.9	2.2	7.2	NA	NA	NA	91.0	33.0	NA
DEP 90th UPV	11.0	7.4	28.0	2.7	28.0	1.4	54.0				330.0	220.0	44.0

Risk Calculation Equations and Standard Parameter Values

Cancer Risk from Inhalation

ELCR_{air} = LADE₍₁₋₃₁₎ * URF where: LA

"
URF where: LADE = $\underline{[OHM]_{alr}}$ * \underline{EF} * \underline{ED} * $\underline{EP}_{(1:31)}$ AP $\underline{(illetime)}$

 Noncancer Risk from Inhalation

 HOair =
 ADE * C
 where:
 ADE =
 [OHM]air * EF * ED * EP_{(1.8)}

 RIC
 AP_(noncancer)

	Benzene	Ethylbenzene	Xylenes	Naphthalen e	Xylenes	Styrene	Toluene	1,3-Butadiene		Methylnaphtha lene, 2-	Aliphatics C5 to C8		Aromatics C9 to C10
URF (ug/m3)-1	7.80E-06					5.7E-07		NA					
RfC mg/m3	3.00E-02	1.00E+00	1.0E-01	3.00E-03	1.0E-01	1.0E+00	5.0E+00	NA	3.0E+00	5.00E-02	2.0E-01	2.0E-01	5.0E-02

Parameter	Value	Units
ELCR - Excess Lifetime Cancer Risk		dimensionless
URF - Unit Risk Factor		(µg/m³)-1
LADE - Lifetime Average Daily Exposure		μg/m ³
HQ - Hazard Quotient		dimensionless
RfC - Reference Concentration		mg/m ³
ADE - Average Daily Exposure		μg/m ³
EPC - Exposure Point Concentration		μq/L

Parameter	Value	Units
EF - Exposure Frequency	See Below	event/day
ED - Exposure Duration	See Below	day/event
EP ₍₁₋₈₎ - Exposure Period for age group 1-8	7	years
EP ₍₁₋₃₁₎ - Exposure Period for age group 1-31	30	years
AP _(noncancer) - Averaging Period for noncancer	7	years
AP _(lifetime) - Averaging Period for lifetime	70	years
C = Conversion Factor (mg to ug)	0.001	mg/ug

Residential Exposure Scenario															
	EF - Exposure Freq	uency		1.00	event/day		ED - Exposure	Duration		1.00	day/event				
=	То														
ELCR	7.29E-06					5.25E-07								8.E-06	1.E-05
	93%					7%									
_															
HI	7.27E-02	1.86E-03	4.07E-02	NA	1.88E-02	2.15E-03	2.16E-03	NA	NA	NA	4.52E-01	1.97E-01	NA	8.E-01	1.E+00
	9%	0%	5%	NA	2%	0%	0%	NA	NA	NA	57%	25%	NA		

Commercial Exposure Scenario															
	EF - Exposure Frequency 0.33 event/day ED - Exposure Duration 0.71 day/event														
														Total	Limits
ELCR	1.71E-06					1.23E-07								2.E-06	1.E-05
	93%					7%									
														-	
HI	1.70E-02	4.35E-04	9.52E-03	NA	4.39E-03	5.04E-04	5.06E-04	NA	NA	NA	1.06E-01	4.62E-02	NA	2.E-01	1.E+00
	9%	0%	5%	NA	2%	0%	0%	NA	NA	NA	57%	25%	NA		

Notes

Average of detected concentrations only (detection limits not included) from February 2004 through April 2008. Does not include outdoor (site 2) or "sys-inf" samples. ug/m3 micrograms per cubic meter (ug/m3)

Risk calculation equations and standard parameter values from DEP "Short Forms for Human Health Risk Assessment under the MCP" Updated February 2007 For Commerical Expsoure EF changed to 8 hours per 24 hours (0.33) to represent work shift and ED changed to 5 days per 7 day week (0.71) to represent work week DEP 90th UPV = Data from Draft DEP Policy Entitled "Typical Indoor Air Concentrations - Technical Update Policy #08-XXX"



APPENDIX A
COPY OF RELEASE ABATEMENT MEASURE (RAM) TRANSMITTAL FORM (BWSC-106) AND REMEDIAL MONITORING REPORT

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LABORATORY DATA REPORT - AIR SAMPLES



LABORATORY REPORT

May 6, 2008

Michael Lotti Innovative Engineering Solutions, Incorporated 25 Spring Street Walpole, MA 02081

RE: 129 Commercial

Dear Michael:

Enclosed are the results of the samples submitted to our laboratory on April 18, 2008. For your reference, these analyses have been assigned our service request number P0801103.

All analyses were performed in accordance with our laboratory's quality assurance program. Results are intended to be considered in their entirety and apply only to the samples analyzed and reported herein. Your report contains ______ pages.

Columbia Analytical Services, Inc. is certified by the California Department of Health Services, NELAP Laboratory Certificate No. 02115CA; Arizona Department of Health Services, Certificate No. AZ0694; Florida Department of Health, NELAP Certification E871020; New Jersey Department of Environmental Protection, NELAP Laboratory Certification ID #CA009; New York State Department of Health, NELAP NY Lab ID No: 11221; Oregon Environmental Laboratory Accreditation Program, NELAP ID: CA20007; The American Industrial Hygiene Association, Laboratory #101661; Department of the Navy (NFESC); Pennsylvania Registration No. 68-03307. Each of the certifications listed above have an explicit Scope of Accreditation that applies to specific matrices/methods/analytes; therefore, please contact me for information corresponding to a particular certification.

If you have any questions, please call me at (805) 526-7161.

Chileson For

Respectfully submitted,

Columbia Analytical Services, Inc.

Kate Aguilera Project Manager

Page 1 of 19



Client:

Innovative Engineering Solutions, Incorporated

CAS Project No:

P0801103

Project:

129 Commercial

CASE NARRATIVE

The samples were received intact under chain of custody on April 18, 2008 and were stored in accordance with the analytical method requirements. Please refer to the sample acceptance check form for additional information. The results reported herein are applicable only to the condition of the samples at the time of sample receipt.

Air-Phase Petroleum Hydrocarbons (APH) Analysis

The samples were also analyzed for selected and total aliphatic and aromatic gasoline range hydrocarbons by gas chromatography/mass spectrometry according to the <u>Method for the Determination of Air-Phase Petroleum Hydrocarbons(APH)</u>, Public Comment Draft 1.0, Massachusetts Department of Environmental Protection, February, 2000.

Styrene Analysis

The samples were also analyzed for styrene in accordance with EPA Method TO-15 from the Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air, Second Edition (EPA/625/R-96/010b), January, 1999. The analytical system was comprised of a gas chromatograph / mass spectrometer (GC/MS) interfaced to a whole-air preconcentrator.

The reporting limit is elevated for sample Site-8. The chromatogram indicated the presence of non-target background components. The sample was diluted in order to prevent damage to the instrument and the results are flagged accordingly.

The results of analyses are given in the attached laboratory report. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for utilization of less than the complete report.

Innovative Engineering Solutions, Incorporated

129 Commercial Project:

Client:

Detailed Sample Information

Folder: P0801103

Order#	8288	8288	8288	8288	8288	8288	8288	8288
FC ID	FC00327	FC00241	FC00310	FC00293	FC00352	FC00613	FC00578	FC00535
Order#	8288	8288	8288	8288	8288	8288	8288	8288
Cont ID	AC01202	AC01245	AC01336	AC01043	AC01193	AC00988	AC00656	AC00818
Pf2								
Pi2 (psig)								
Pi2 (Hg)								
Pf	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5
Pi1 (psig)	-3.6	0.3	-3.7	-4.2	-4.2	-2.6	-4.3	-5.2
Pi1 (Hg)	-7.4		-7.5	-8.6	-8.5	-5.2	-8.8	-10.6
Container Type	6.0 L-Summa Canister Ambient							
CAS Sample ID Client Sample ID Container Type	Site-5	Site-4	Site-6	Site-2	Site-7	Site-77	Site-8	Sys-Inf
CAS Sample ID	P0801103-001.01	P0801103-002.01	P0801103-003.01	P0801103-004.01	P0801103-005.01	P0801103-006.01	P0801103-007.01	P0801103-008.01

Miscellaneous Items - received

AVG00469	AVG00528	AVG00115	AVG00686	AVG00484	AVG00525	AVG00582	AVG00463

Columbia Analytical Services mc

Air - Chain of Custody Record & Analytical Service Request

Page of

2655 Park Center Drive, Suite A Simi Valley, California 93065

Requested Turnaround Time in Business Days (Surcharges) please circle 1 Day (100%) 2 Day (75%) 3 Day (50%) 4 Day (35%) 5 Day (25%) 10 Day - Standard Phone (805) 526-7161 Fax (805) 526-7270

e.g. Actual Preservative or specific instructions Project Requirements (MRLs, QAPP) Comments Wear Plan Azan CAS Project No. 0/1 0 j Analysis Method and/or Analytes 08) Stort 2 30 26 tots + IMP 0756 0350 080 048 0+2 0 120 0 0722 0.423 CAS Contact Sample Volume 1927 Flow Controller (Bar Code -FC #) 36 248 352 376 20 ラハ Wo Malden Stask 8 Canister ID (Bar Code # -AC, SC, etc.) 129 COMMARIA 400202 ACOOM88 Access Accepta Aco 1336 A:01215 ACO1193 ACOURT ACOURT Wichel Loth P.O. # / Billing Information Sample Type (Air/Tube/ Solid) Sampler (Print & Sign) Project Number Project Name Time Collected 443 49 P.I 1440 37.12 444 37. 1455 Date Collected 39/9//4 M. lotie jesion jik. (ou Company Name & Address (Reporting Information) 508-668-5145 80-10 C Laboratory ID Number (Dro3 5-56 0-52 0.74 E-15/ (f)-8.6 8.8 25 Spring Strat Email Address for Result Reporting Project Manager 508-668-0233 X23/ 一大叶 ナーク Client Sample ID 575 Phone

Report Tier Levels - please select Fier 1 - (Results/Default if not specified) Tier II - (Results + QC)

Relinquished by: (Signature)

Relinquished by: (Signature) Relinquished by: (Signature)

Tier III - (Data Validation Package) 10% Surcharge ____ Tier V - (client specified) _____

EDD required Yes / No Type:

EDD Units:

Date: 17-00 Time: 0 420 Received by: (Signature) Affletone Received by: (Signature) Received by: (Signatur

Time:

Date:

Cooler / Blank

Date: Time:

Time:

Date:

Columbia Analytical Services, Inc. Sample Acceptance Check Form

Maritim administrative services	tive Engineering Solutions, I	ncorporated		-	Work order:	P0801103	to a series and a s		····
Project: 129 Co				D	4/10/0000		2.67.12	(OD 4	
- , ,	red on: 4/18/2008		•	Date opened:		_ by:	MZAN		
	ed for all samples received by CAS		•		_			indication	of
compliance or noncor	formity. Thermal preservation and	l pH will only be	evaluated either a	t the request of the	ne client and/or as re	quired by the meth	Yes	<u>No</u>	N/A
1 Were s	ample containers properly i	narked with cl	ient sample ID)?			X		
2 Contain	ner(s) supplied by CAS?						X		
3 Did san	nple containers arrive in go	od condition?					\times		
4 Were c	hain-of-custody papers used	l and filled out	?				X		
5 Did san	nple container labels and/o	r tags agree wi	th custody par	ers?			X		
6 Was sa	mple volume received adeq	uate for analys	is?				X		
7 Are sar	nples within specified holding	ng times?					X		
	oper temperature (thermal)	-	of cooler at rec	eipt adhered t	to?				\times
	Cooler Temperature		°C Blank	Γemperature	***************************************	_°C			
9 Was a t	rip blank received?							X	
	plank supplied by CAS: Seri			-TB				# *	
10 Were c	ustody seals on outside of co	ooler/Box?	-					\times	
	ion of seal(s)?					_Sealing Lid?			\boxtimes
Were	signature and date included	?							\times
Were	seals intact?								\times
Were co	ustody seals on outside of sa	mple containe	r?			•		X	
Locat	ion of seal(s)?					_Sealing Lid?			X
Were	signature and date included	?							\times
Were	seals intact?								X
11 Do con	tainers have appropriate pre	servation, acc	ording to metl	nod/SOP or C	lient specified in	formation?			\times
Is there	e a client indication that the s	submitted samp	oles are pH p	reserved?					X
Were V	OA vials checked for prese	ence/absence o	f air bubbles?						\boxtimes
Does the	ne client/method/SOP requir	e that the analy	st check the s	ample pH and	l if necessary al	ter it?			X
12 Tubes:	Are the tubes cap	•		Pro Pro time					\boxtimes
	Do they contain n	-							\boxtimes
13 Badges	·		and intact?						X
	Are dual bed bad			y capped and	intact?				X
Lab Sample I	D Container	Required	Received	Adjusted	VOA Headspace	Recein	t / Prese	ervation	
•	Description	pH *	рH	рН	(Presence/Absence)		ommen		
P0801103-001.01	6.0 L Ambient Can								
P0801103-002.01	6.0 L Ambient Can								
P0801103-003.01	6.0 L Ambient Can								
P0801103-004.01	6.0 L Ambient Can		·						
P0801103-005.01	6.0 L Ambient Can					-			
P0801103-006.01 P0801103-007.01	6.0 L Ambient Can 6.0 L Ambient Can								
	pancies: (include lab sample ID	numbers).				<u> </u>			

Columbia Analytical Services, Inc. Sample Acceptance Check Form

Client: Innovative Engineering Solutions, Incorporated	Work order:	P0801103	
Project: 129 Commercial			
Sample(s) received on: 4/18/2008	Date opened: 4/18/2008	hv·	MZAMORA

Lab Sample ID	Container Description	Required pH *	Received pH	Adjusted pH	VOA Headspace (Presence/Absence)	
P0801103-008.01	6.0 L Ambient Can					
nakon pykra na politika kitaka ki						
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eraktoa keti suuki da kuniimmaa kuuros suudii Houka dikii iliakiisidika kedan jamiaksa sudaa sidaa kekikus kik						
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				***************************************	***************************************	
						-
CANONIO 3 MONTE DI MATTICI IL PARTICI						

Explain any discrepancies: (include lab sample ID numbers):

RESULTS OF ANALYSIS Page 1 of 1

Client:

Innovative Engineering Solutions, Incorporated

Client Project ID: 129 Commercial

CAS Project ID: P0801103

Styrene

Test Code:

EPA TO-15

Instrument ID:

Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13

Rusty Bravo

Analyst: Sampling Media:

6.0 L Summa Canister(s)

Date(s) Collected: 4/16/08

Date Received: 4/18/08

Date Analyzed: 4/21 - 4/22/08

Test Notes:

		Injection	Canister						
Client Sample ID	CAS Sample ID	Volume	Dilution	• .	Result	MRL	Result	MRL	Data
		Liter(s)	Factor		$\mu g/m^3$	$\mu g/m^3$	ppbV	ppbV	Qualifier
Site-5	P0801103-001	1.00	1.64		ND	1.6	ND	0.39	
Site-4	P0801103-002	1.00	1.21		ND	1.2	ND	0.28	
Site-6	P0801103-003	0.50	1.65		ND	3.3	ND	0.78	
Site-2	P0801103-004	1.00	1.73		ND	1.7	ND	0.41	
Site-7	P0801103-005	1.00	1.73		ND	1.7	ND	0.41	
Site-77	P0801103-006	1.00	1.50		ND	1.5	ND	0.35	
Site-8	P0801103-007	0.060	1.75		ND	29	ND	6.9	
Sys-Inf	P0801103-008	1.00	1.92		13	1.9	3.0	0.45	
Method Blank	P080421-MB	1.00	1.00		ND	1.0	ND	0.23	

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

Verified By: Re-

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

RESULTS OF ANALYSIS

Page 1 of 1

Client:

Innovative Engineering Solutions, Incorporated

Client Sample ID: Site-5

Client Project ID: 129 Commercial

CAS Project ID: P0801103

CAS Sample ID: P0801103-001

Test Code:

Massachusetts APH Public Comment Draft 1.0 Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13 Date Collected: 4/16/08 Date Received: 4/18/08

Instrument ID: Analyst:

Rusty Bravo

Date Analyzed: 4/21/08

Sampling Media:

6.0 L Summa Canister

Volume(s) Analyzed:

1.00 Liter(s)

Test Notes:

Container ID:

AC01202

Initial Pressure (psig):

-3.6

Final Pressure (psig):

3.5

Canister Dilution Factor: 1.64

CAS#	Compound	Result μg/m³	MRL μg/m³	Result ppbV	MRL ppbV	Data Qualifier
-	Unadjusted C ₅ - C ₈ Aliphatics ¹	69	66	NA	NA	+
	Unadjusted C ₉ - C ₁₂ Aliphatics ¹	31	16	NA	NA	+
106-99-0	1,3-Butadiene*	ND	0.82	ND	0.38	
1634-04-4	Methyl tert-Butyl Ether	ND	0.82	ND	0.23	
71-43-2	Benzene	1.1	0.82	0.36	0.26	
108-88-3	Toluene	4.3	0.82	1.1	0.21	
100-41-4	Ethylbenzene	ND	0.82	ND	0.20	
179601-23-1	m,p-Xylenes	1.9	1.6	0.43	0.38	
95-47-6	o-Xylene	ND	0.82	ND	0.20	
91-20-3	Naphthalene	ND	0.82	ND	0.16	
91-57-6	2-Methylnaphthalene	ND	0.82	ND	0.14	
	C ₅ - C ₈ Aliphatic Hydrocarbons ^{1,2}	ND	66	NA	NA	
	C ₉ - C ₁₂ Aliphatic Hydrocarbons ^{1,3}	27	16	NA	NA	+
	C ₉ - C ₁₀ Aromatic Hydrocarbons	ND	16	NA	NA	

¹Hydrocarbon Range data from total ion chromatogram excluding any internal/tuning standards eluting in that range.

Verified By: Date:

²C₅-C₈ Aliphatic Hydrocarbons exclude the concentration of Target APH analytes eluting in that range.

³C₀-C₁₂ Aliphatic Hydrocarbons exclude concentration of Target APH Analytes eluting in that range and concentration of C₀-C₁₀ Aromatic Hydrocarbons.

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

^{* =} Due to matrix interference, 1,3-Butadiene results determined by EPA Method TO-15 quantitation method.

⁺⁼ Significant non-petroleum related peaks (i.e. halogenated, oxygenated, terpenes, etc.) are subtracted from the hydrocarbon range areas.

RESULTS OF ANALYSIS Page 1 of 1

Client: Innovative Engineering Solutions, Incorporated

AC01245

Container ID:

Client Sample ID: Site-4 CAS Project ID: P0801103

Client Project ID: 129 Commercial CAS Sample ID: P0801103-002

Test Code: Massachusetts APH Public Comment Draft 1.0 Date Collected: 4/16/08

Instrument ID: Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13 Date Received: 4/18/08
Analyst: Rusty Bravo Date Analyzed: 4/21/08

Sampling Media: 6.0 L Summa Canister Volume(s) Analyzed: 1.00 Liter(s)

Test Notes:

Initial Pressure (psig): 0.3 Final Pressure (psig): 3.5

Canister Dilution Factor: 1.21

CAS#	Compound	Result μg/m³	MRL μg/m³	Result ppbV	MRL ppbV	Data Qualifier
	Unadjusted C ₅ - C ₈ Aliphatics ¹	82	48	NA	NA	+
	Unadjusted C ₉ - C ₁₂ Aliphatics ¹	28	12	NA	NA	+
106-99-0	1,3-Butadiene*	ND	0.61	ND	0.28	
1634-04-4	Methyl tert-Butyl Ether	ND	0.61	ND	0.17	
71-43-2	Benzene	1.4	0.61	0.43	0.19	
108-88-3	Toluene	5.8	0.61	1.5	0.16	
100-41-4	Ethylbenzene	0.82	0.61	0.19	0.15	
179601-23-1	m,p-Xylenes	2.3	1.2	0.53	0.28	
95-47-6	o-Xylene	0.87	0.61	0.20	0.15	
91-20-3	Naphthalene	ND	0.61	ND	0.11	
91-57-6	2-Methylnaphthalene	ND	0.61	ND.	0.10	
	C ₅ - C ₈ Aliphatic Hydrocarbons ^{1,2}	70	48	NA	NA	+
	C ₉ - C ₁₂ Aliphatic Hydrocarbons ^{1,3}	18	12	NA.	NA	+
	C ₉ - C ₁₀ Aromatic Hydrocarbons	ND	12	NA	NA	

^{&#}x27;Hydrocarbon Range data from total ion chromatogram excluding any internal/tuning standards eluting in that range.

Verified By: Date: 5/5/08

²C₅-C₈ Aliphatic Hydrocarbons exclude the concentration of Target APH analytes eluting in that range.

³C₀-C₁₂ Aliphatic Hydrocarbons exclude concentration of Target APH Analytes eluting in that range and concentration of C₀-C₁₀ Aromatic Hydrocarbons.

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

^{* =} Due to matrix interference, 1,3-Butadiene results determined by EPA Method TO-15 quantitation method.

^{+ =} Significant non-petroleum related peaks (i.e. halogenated, oxygenated, terpenes, etc.) are subtracted from the hydrocarbon range areas.

RESULTS OF ANALYSIS Page 1 of 1

Innovative Engineering Solutions, Incorporated Client:

Client Sample ID: Site-6

CAS Project ID: P0801103 Client Project ID: 129 Commercial CAS Sample ID: P0801103-003

Test Code: Massachusetts APH Public Comment Draft 1.0

Date Collected: 4/16/08 Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13 Date Received: 4/18/08

Instrument ID: Date Analyzed: 4/21/08 Rusty Bravo Analyst:

Sampling Media: 6.0 L Summa Canister Volume(s) Analyzed: 0.50 Liter(s)

Test Notes:

Container ID: AC01336

> Final Pressure (psig): Initial Pressure (psig): -3.73.5

> > Canister Dilution Factor: 1.65

CAS#	Compound	Result μg/m³	MRL μg/m³	Result ppbV	MRL ppbV	Data Qualifier
	Unadjusted C ₅ - C ₈ Aliphatics ¹	140	130	NA	NA	+
	Unadjusted C ₉ - C ₁₂ Aliphatics ¹	79	33	NA	NA	+
106-99-0	1,3-Butadiene*	ND	1.7	ND	0.76	
1634-04-4	Methyl tert-Butyl Ether	ND	1.7	ND	0.46	
71-43-2	Benzene	ND	1.7	ND	0.53	
108-88-3	Toluene	5.6	1.7	1.5	0.43	
100-41-4	Ethylbenzene	ND	1.7	ND	0.40	
179601-23-1	m,p-Xylenes	ND	3.3	ND	0.76	
95-47-6	o-Xylene	ND	1.7	ND	0.40	
91-20-3	Naphthalene	ND	1.7	ND	0.31	
91-57-6	2-Methylnaphthalene	ND	1.7	ND	0.28	
	C ₅ - C ₈ Aliphatic Hydrocarbons ^{1,2}	ND	130.	NA	NA	
	C ₉ - C ₁₂ Aliphatic Hydrocarbons ^{1,3}	71	33	NA	NA	+
	C ₉ - C ₁₀ Aromatic Hydrocarbons	ND	33	NA	NA	

^{&#}x27;Hydrocarbon Range data from total ion chromatogram excluding any internal/tuning standards eluting in that range.

Verified By: CH Date: APH..XLT - Page No.

²C₅-C₈ Aliphatic Hydrocarbons exclude the concentration of Target APH analytes eluting in that range.

³C₉-C₁₂ Aliphatic Hydrocarbons exclude concentration of Target APH Analytes eluting in that range and concentration of C₉-C₁₀ Aromatic Hydrocarbons.

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

^{* =} Due to matrix interference, 1,3-Butadiene results determined by EPA Method TO-15 quantitation method.

⁺⁼ Significant non-petroleum related peaks (i.e. halogenated, oxygenated, terpenes, etc.) are subtracted from the hydrocarbon range areas.

RESULTS OF ANALYSIS Page 1 of 1

Client: Innovative Engineering Solutions, Incorporated

Client Sample ID: Site-2 CAS Project ID: P0801103

Client Project ID: 129 Commercial CAS Sample ID: P0801103-004

Test Code: Massachusetts APH Public Comment Draft 1.0 Date Collected: 4/16/08

Instrument ID: Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13 Date Received: 4/18/08
Analyst: Rusty Bravo Date Analyzed: 4/21/08

Sampling Media: 6.0 L Summa Canister Volume(s) Analyzed: 1.00 Liter(s)

-4.2

Test Notes:
Container ID: AC01043

Initial Pressure (psig):

Canister Dilution Factor: 1.73

3.5

Final Pressure (psig):

CAS#	Compound	Result	MRL	Result	MRL	Data
		μg/m³	μg/m³	ppbV	ppbV	Qualifier
	Unadjusted C ₅ - C ₈ Aliphatics ¹	ND	69	NA	NA	
	Unadjusted C ₉ - C ₁₂ Aliphatics ¹	29	17	NA	NA	+
106-99-0	1,3-Butadiene*	ND	0.87	ND	0.40	
1634-04-4	Methyl tert-Butyl Ether	ND	0.87	ND	0.24	
71-43-2	Benzene	1.4	0.87	0.44	0.28	
108-88-3	Toluene	4.8	0.87	1.3	0.22	
100-41-4	Ethylbenzene	ND	0.87	ND	0.21	
179601-23-1	m,p-Xylenes	2.0	1.7	0.47	0.40	
95-47-6	o-Xylene	ND	0.87	ND	0.21	
91-20-3	Naphthalene	ND	0.87	ND	0.16	
91-57-6	2-Methylnaphthalene	ND	0.87	ND	0.15	
	C ₅ - C ₈ Aliphatic Hydrocarbons ^{1,2}	ND	69	NA	NA	
	C ₉ - C ₁₂ Aliphatic Hydrocarbons ^{1,3}	24	17	NA	NA	+
	C ₉ - C ₁₀ Aromatic Hydrocarbons	ND	17	NA	NA	

^{&#}x27;Hydrocarbon Range data from total ion chromatogram excluding any internal/tuning standards eluting in that range.

Verified By: Date: 5/5/08

²C₅-C₈ Aliphatic Hydrocarbons exclude the concentration of Target APH analytes eluting in that range.

³C₉-C₁₂ Aliphatic Hydrocarbons exclude concentration of Target APH Analytes eluting in that range and concentration of C₉-C₁₀ Aromatic Hydrocarbons.

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

^{* =} Due to matrix interference, 1,3-Butadiene results determined by EPA Method TO-15 quantitation method.

^{+ =} Significant non-petroleum related peaks (i.e. halogenated, oxygenated, terpenes, etc.) are subtracted from the hydrocarbon range areas.

RESULTS OF ANALYSIS Page 1 of 1

Client: Innovative Engineering Solutions, Incorporated

Client Sample ID: Site-7 CAS Project ID: P0801103

Client Project ID: 129 Commercial CAS Sample ID: P0801103-005

Test Code: Massachusetts APH Public Comment Draft 1.0 Date Collected: 4/16/08

Instrument ID: Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13 Date Received: 4/18/08
Analyst: Rusty Bravo Date Analyzed: 4/21/08

Sampling Media: 6.0 L Summa Canister Volume(s) Analyzed: 1.00 Liter(s)

Test Notes:

Container ID: AC01193

Initial Pressure (psig): -4.2 Final Pressure (psig): 3.5

Canister Dilution Factor: 1.73

CAS#	Compound	Result μg/m³	MRL μg/m³	Result ppbV	MRL ppbV	Data Qualifier
	Unadjusted C ₅ - C ₈ Aliphatics ¹	100	69	NA	NA	+
	Unadjusted C ₉ - C ₁₂ Aliphatics ¹	38	17	NA	NA	+
106-99-0	1,3-Butadiene*	ND	0.87	ND	0.40	
1634-04-4	Methyl tert-Butyl Ether	ND	0.87	ND	0.24	
71-43-2	Benzene	1.2	0.87	0.36	0.28	
108-88-3	Toluene	4.3	0.87	1.1	0.22	
100-41-4	Ethylbenzene	1.1	0.87	0.26	0.21	
179601-23-1	m,p-Xylenes	2.2	1.7	0.50	0.40	
95-47-6	o-Xylene	ND	0.87	ND	0.21	
91-20-3	Naphthalene	ND	0.87	ND	0.16	
91-57-6	2-Methylnaphthalene	ND	0.87	ND	0.15	
	C ₅ - C ₈ Aliphatic Hydrocarbons ^{1,2}	91	69	NA	NA	+
	C ₉ - C ₁₂ Aliphatic Hydrocarbons ^{1,3}	33	17	NA	NA	+
	C ₉ - C ₁₀ Aromatic Hydrocarbons	ND	17	NA	NA	

¹Hydrocarbon Range data from total ion chromatogram excluding any internal/tuning standards eluting in that range.

²C₅-C₈ Aliphatic Hydrocarbons exclude the concentration of Target APH analytes eluting in that range.

³C₉-C₁₂ Aliphatic Hydrocarbons exclude concentration of Target APH Analytes eluting in that range and concentration of C₉-C₁₀ Aromatic Hydrocarbons.

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

^{* =} Due to matrix interference, 1,3-Butadiene results determined by EPA Method TO-15 quantitation method.

⁺⁼ Significant non-petroleum related peaks (i.e. halogenated, oxygenated, terpenes, etc.) are subtracted from the hydrocarbon range areas.

RESULTS OF ANALYSIS Page 1 of 1

Client:

Innovative Engineering Solutions, Incorporated

Client Sample ID: Site-77

Client Project ID: 129 Commercial

CAS Project ID: P0801103

CAS Sample ID: P0801103-006

Test Code:

Analyst:

Massachusetts APH Public Comment Draft 1.0 Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13 Date Collected: 4/16/08 Date Received: 4/18/08

Instrument ID:

Rusty Bravo

Date Analyzed: 4/21/08

Sampling Media:

6.0 L Summa Canister

Volume(s) Analyzed:

1.00 Liter(s)

Test Notes:

Container ID:

AC00988

Initial Pressure (psig):

-2.6

Final Pressure (psig):

3.5

Canister Dilution Factor: 1.50

CAS#	Compound	Result μg/m³	MRL μg/m³	Result ppbV	MRL ppbV	Data Qualifier
	Unadjusted C ₅ - C ₈ Aliphatics ¹	130	60	NA	NA	+
	Unadjusted C ₉ - C ₁₂ Aliphatics ¹	54	15	NA	NA	+
106-99-0	1,3-Butadiene*	ND	0.75	ND	0.35	
1634-04-4	Methyl tert-Butyl Ether	ND	0.75	ND	0.21	
71-43-2	Benzene	1.3	0.75	0.40	0.24	
108-88-3	Toluene	14	0.75	3.7	0.20	
100-41-4	Ethylbenzene	1.2	0.75	0.28	0.18	
179601-23-1	m,p-Xylenes	2.4	1.5	0.55	0.35	
95-47-6	o-Xylene	0.98	0.75	0.22	0.18	
91-20-3	Naphthalene	ND	0.75	ND	0.14	
91-57-6	2-Methylnaphthalene	ND	0.75	ND	0.13	
	C ₅ - C ₈ Aliphatic Hydrocarbons ^{1,2}	110	60	NA	NA	-+
	C ₉ - C ₁₂ Aliphatic Hydrocarbons ^{1,3}	48	15	NA	NA	+
	C ₉ - C ₁₀ Aromatic Hydrocarbons	ND	15	NA	NA	

^{&#}x27;Hydrocarbon Range data from total ion chromatogram excluding any internal/tuning standards eluting in that range.

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

- * = Due to matrix interference, 1,3-Butadiene results determined by EPA Method TO-15 quantitation method.
- += Significant non-petroleum related peaks (i.e. halogenated, oxygenated, terpenes, etc.) are subtracted from the hydrocarbon range areas.

Verified By: Date: CH

P0801103_APH_0804291602_SS.xls - Sample (6)

²C₅-C₈ Aliphatic Hydrocarbons exclude the concentration of Target APH analytes eluting in that range.

³C₉-C₁₂ Aliphatic Hydrocarbons exclude concentration of Target APH Analytes eluting in that range and concentration of C₉-C₁₀ Aromatic Hydrocarbons.

RESULTS OF ANALYSIS

Page 1 of 1

Client:

Innovative Engineering Solutions, Incorporated

Client Sample ID: Site-8

Client Project ID: 129 Commercial

CAS Project ID: P0801103

CAS Sample ID: P0801103-007

Test Code:

Massachusetts APH Public Comment Draft 1.0

Date Collected: 4/16/08

Instrument ID:

Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13

Date Received: 4/18/08 Date Analyzed: 4/22/08

Analyst:

Rusty Bravo 6.0 L Summa Canister

Volume(s) Analyzed:

0.060 Liter(s)

Sampling Media:

Test Notes: Container ID:

AC00656

Initial Pressure (psig):

-4.3

Final Pressure (psig):

3.5

Canister Dilution Factor: 1.75

CAS#	Compound	Result μg/m³	MRL μg/m³	Result ppbV	MRL ppbV	Data Qualifier
	Unadjusted C ₅ - C ₈ Aliphatics¹	ND	1,200	NA	NA	
	Unadjusted C ₉ - C ₁₂ Aliphatics ¹	ND	290	NA	NA	
106-99-0	1,3-Butadiene*	ND	15	ND	6.7	
1634-04-4	Methyl tert-Butyl Ether	ND	15	ND	4.1	
71-43-2	Benzene	ND	15	ND	4.7	
108-88-3	Toluene	ND	15	ND	3.8	
100-41-4	Ethylbenzene	ND	15	ND	3.5	
179601-23-1	m,p-Xylenes	ND	29	ND	6.7	
95-47-6	o-Xylene	ND	15	ND	3.5	
91-20-3	Naphthalene	ND	15	ND	2.8	
91-57-6	2-Methylnaphthalene	ND	15	ND	2.5	
	C ₅ - C ₈ Aliphatic Hydrocarbons ^{1,2}	ND	1,200	NA	NA	
	C ₉ - C ₁₂ Aliphatic Hydrocarbons ^{1,3}	ND	290	NA	NA	
	C ₉ - C ₁₀ Aromatic Hydrocarbons	ND	290	NA -	NA	

¹Hydrocarbon Range data from total ion chromatogram excluding any internal/tuning standards eluting in that range.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

Verified By: Car

²C₅-C₈ Aliphatic Hydrocarbons exclude the concentration of Target APH analytes eluting in that range.

³C₉-C₁₂ Aliphatic Hydrocarbons exclude concentration of Target APH Analytes eluting in that range and concentration of C₂-C₁₀ Aromatic Hydrocarbons.

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

^{* =} Due to matrix interference, 1,3-Butadiene results determined by EPA Method TO-15 quantitation method.

RESULTS OF ANALYSIS

Page 1 of 1

Client:

Innovative Engineering Solutions, Incorporated

Client Sample ID: Sys-Inf

Client Project ID: 129 Commercial

CAS Project ID: P0801103

CAS Sample ID: P0801103-008

Test Code:

Massachusetts APH Public Comment Draft 1.0 Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13 Date Collected: 4/16/08 Date Received: 4/18/08

Instrument ID: Analyst:

Rusty Bravo

Date Analyzed: 4/21/08

Sampling Media:

6.0 L Summa Canister

Volume(s) Analyzed:

1.00 Liter(s)

Test Notes:

Container ID:

AC00818

Initial Pressure (psig):

-5.2

Final Pressure (psig):

3.5

Canister Dilution Factor: 1.92

CAS#	Compound	Result μg/m³	MRL μg/m³	Result ppbV	MRL ppbV	Data Qualifier
	Unadjusted C ₅ - C ₈ Aliphatics ¹	610	77	NA	NA	+
	Unadjusted C ₉ - C ₁₂ Aliphatics ¹	180	19	NA	NA	+
106-99-0	1,3-Butadiene*	ND	0.96	ND	0.44	
1634-04-4	Methyl tert-Butyl Ether	ND	0.96	ND	0.27	
71-43-2	Benzene	2.4	0.96	0.75	0.31	
108-88-3	Toluene	31	0.96	8.1	0.25	
100-41-4	Ethylbenzene	12	0.96	2.8	0.23	
179601-23-1	m,p-Xylenes	35	1.9	8.0	0.44	
95-47-6	o-Xylene	8.6	0.96	2.0	0.23	
91-20-3	Naphthalene	1.4	0.96	0.27	0.18	
91-57-6	2-Methylnaphthalene	ND	0.96	ND	0.17	
	C ₅ - C ₈ Aliphatic Hydrocarbons ^{1,2}	520	77	NA	NA	+
	C ₉ - C ₁₂ Aliphatic Hydrocarbons ^{1,3}	140	19	NA	NA	+
	C ₉ - C ₁₀ Aromatic Hydrocarbons	34	19	NA	NA	+

^{&#}x27;Hydrocarbon Range data from total ion chromatogram excluding any internal/tuning standards eluting in that range.

Verified By: ____

²C₅-C₈ Aliphatic Hydrocarbons exclude the concentration of Target APH analytes eluting in that range.

³C₉-C₁₂ Aliphatic Hydrocarbons exclude concentration of Target APH Analytes eluting in that range and concentration of C₉-C₁₀ Aromatic Hydrocarbons.

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

^{* =} Due to matrix interference, 1,3-Butadiene results determined by EPA Method TO-15 quantitation method.

⁺⁼ Significant non-petroleum related peaks (i.e. halogenated, oxygenated, terpenes, etc.) are subtracted from the hydrocarbon range areas.

RESULTS OF ANALYSIS

Page 1 of 1

Client:

Innovative Engineering Solutions, Incorporated

Client Sample ID: Method Blank

Client Project ID: 129 Commercial

CAS Project ID: P0801103

CAS Sample ID: P080421-MB

Test Code:

Test Notes:

Massachusetts APH Public Comment Draft 1.0

Instrument ID:

Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13

Analyst:

Rusty Bravo

Sampling Media:

6.0 L Summa Canister

Date Collected: NA

Date Received: NA

Date Analyzed: 4/21/08

Volume(s) Analyzed:

1.00 Liter(s)

CAS#	Compound	Result μg/m³	MRL μg/m³	Result ppbV	MRL ppbV	Data Qualifier
**************************************	Unadjusted C ₅ - C ₈ Aliphatics ¹	ND	40	NA	NA	<u> </u>
	Unadjusted C ₉ - C ₁₂ Aliphatics ¹	ND	10	NA	NA	
106-99-0	1,3-Butadiene*	ND	0.50	ND	0.23	
1634-04-4	Methyl tert-Butyl Ether	ND	0.50	ND	0.14	
71-43-2	Benzene	ND	0.50	ND	0.16	
108-88-3	Toluene	ND	0.50	ND	0.13	
100-41-4	Ethylbenzene	ND	0.50	ND	0.12	
179601-23-1	m,p-Xylenes	ND	1.0	ND	0.23	
95-47-6	o-Xylene	ND	0.50	ND	0.12	
91-20-3	Naphthalene	ND	0.50	ND	0.095	
91-57-6	2-Methylnaphthalene	ND	0.50	ND	0.086	
	C ₅ - C ₈ Aliphatic Hydrocarbons ^{1,2}	ND	40	NA	NA	
	C ₉ - C ₁₂ Aliphatic Hydrocarbons ^{1,3}	ND	10	NA	NA	
	C ₉ - C ₁₀ Aromatic Hydrocarbons	ND	10	NA	NA	

Hydrocarbon Range data from total ion chromatogram excluding any internal/tuning standards eluting in that range.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

Verified By:

²C₅-C₈ Aliphatic Hydrocarbons exclude the concentration of Target APH analytes eluting in that range.

³C₉-C₁₂ Aliphatic Hydrocarbons exclude concentration of Target APH Analytes eluting in that range and concentration of C₉-C₁₀ Aromatic Hydrocarbons.

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

^{* =} Due to matrix interference, 1,3-Butadiene results determined by EPA Method TO-15 quantitation method.

SURROGATE SPIKE RECOVERY RESULTS

Page 1 of 1

Client:

Innovative Engineering Solutions, Incorporated

Client Project ID:

129 Commercial

CAS Project ID: P0801103

Test Code:

EPA Massachusetts APH Public Comment Draft 1.0

Instrument ID:

Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13

Analyst:

Rusty Bravo

Date(s) Collected: 4/16/08

Date(s) Received: 4/18/08

Sampling Media:

Summa Canister(s)

Date(s) Analyzed: 4/21 - 4/22/08

Test Notes:

		1,2-Dichlor	oethane-d4	Toluene-d8		Bromofluorobenzene		
Client Sample ID	CAS Sample ID	%	Acceptance	%	Acceptance	%	Acceptance	Data
		Recovered	Limits	Recovered	Limits	Recovered	Limits	Qualifier
Method Blank	P080421-MB	112	70-130	111	70-130	98	70-130	· · · · · · · · · · · · · · · · · · ·
Lab Control Sample	P080421-LCS	114	70-130	111	70-130	100	70-130	
Site-5	P0801103-001	112	70-130	112	70-130	98	70-130	
Site-4	P0801103-002	112	70-130	112	70-130	97	70-130	
Site-6	P0801103-003	112	70-130	114	70-130	98	70-130	
Site-2	P0801103-004	114	70-130	113	70-130	99	70-130	
Site-7	P0801103-005	114	70-150	112	70-150	97	70-150	
Site-77	P0801103-006	113	70-130	114	70-130	97	70-130	
Site-8	P0801103-007	116	70-130	113	70-130	96	70-130	
Sys-Inf	P0801103-008	110	70-130	114	70-130	101	70-130	
Sys-Inf	P0801103-008DUP	111	70-130	114	70-130	99	70-130	

LABORATORY CONTROL SAMPLE SUMMARY Page 1 of 1

Client:

Innovative Engineering Solutions, Incorporated

Client Sample ID: Lab Control Sample

CAS Project ID: P0801103

Client Project ID: 129 Commercial

CAS Sample ID: P080421-LCS

Test Code:

Massachusetts APH Public Comment Draft 1.0 Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13 Date Collected: NA

Instrument ID: Analyst:

Test Notes:

Date Received: NA

Rusty Bravo

Date Analyzed: 4/21/08

Sampling Media:

6.0 L Summa Canister

Volume(s) Analyzed:

NA Liter(s)

					CAS		
CAS#	Compound	Spike Amount	Result	% Recovery	Acceptance	Data	
		ng	ng		Limits	Qualifier	
106-99-0	1,3-Butadiene*	30.0	28.1	94	67-127		
1634-04-4	Methyl tert-Butyl Ether	25.0	24.7	99	70-130		
71-43-2	Benzene	25.0	23.7	95	70-130		
108-88-3	Toluene	25.0	25.2	101	70-130		
100-41-4	Ethylbenzene	25.0	26.9	108	70-130		
179601-23-1	m,p-Xylenes	50.0	56.5	113	70-130		
95-47-6	o-Xylene	25.0	27.6	110	70-130		
91-20-3	Naphthalene	25.0	26.9	108	70-130		
91-57-6	2-Methylnaphthalene	25.0	27.5	110	50-150		

^{* =} Due to matrix interference, 1,3-Butadiene results determined by EPA Method TO-15 quantitation method.

Verified By:

LABORATORY DUPLICATE SUMMARY RESULTS

Page 1 of 1

Client:

Innovative Engineering Solutions, Incorporated

Client Sample ID: Sys-Inf

Client Project ID: 129 Commercial

CAS Project ID: P0801103

CAS Sample ID: P0801103-008DUP

Test Code:

Massachusetts APH Public Comment Draft 1.0 Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13 Date Collected: 4/16/08 Date Received: 4/18/08

Instrument ID: Analyst:

Rusty Bravo

Date Analyzed: 4/21/08

Sampling Media:

6.0 L Summa Canister

Volume(s) Analyzed:

1.00 Liter(s)

Test Notes:

Container ID:

AC00818

Initial Pressure (psig):

-5.2

Final Pressure (psig):

3.5

Canister Dilution Factor: 1.92

			Duplicate				
CAS#	Compound	Sample Result	Sample Result	Average	% RPD	RPD	Data
		μg/m³ ppb	/ μg/m³ ppbV	$\mu g/m^3$		Limit	Qualifier
	Unadjusted C5 - C8 Aliphatics ¹	607 NA	610 NA	608.5	0.5	25	+
	Unadjusted C9 - C12 Aliphatics ¹	177 NA	165 NA	171	7	25	+
106-99-0	1,3-Butadiene*	ND NI	ND ND	-	-	25	
1634-04-4	Methyl tert-Butyl Ether	ND NI	ND ND	-	-	25	
71-43-2	Benzene	2.40 0.75	2.48 0.776	2.44	3	25	
108-88-3	Toluene	30.6 8.1	30.5 8.09	30.55	0.3	25	
100-41-4	Ethylbenzene	12.4 2.8	12.5 2.88	12.45	0.8	25	
179601-23-1	m,p-Xylenes	34.5 7.9	34.5 7.94	34.5	0	25	
95-47-6	o-Xylene	8.56 1.9	8.52 1.96	8.54	0.5	25	
91-20-3	Naphthalene	1.40 0.26	1.42 0.271	1.41	1	25	
91-57-6	2-Methylnaphthalene	ND NI	ND ND	_	-	25	
	C5 - C8 Aliphatic Hydrocarbons ^{1,2}	519 NA	521 NA	520	0.4	25	+
	C9 - C12 Aliphatic Hydrocarbons ^{1,3}	141 NA	129 NA	135	9	25	+
	C9 - C10 Aromatic Hydrocarbons	34.5 NA	34.0 NA	34.25	1	25	+

¹Hydrocarbon Range data from total ion chromatogram excluding any internal/tuning standards eluting in that range.

Verified By: Date: CA

²C₅-C₈ Aliphatic Hydrocarbons exclude the concentration of Target APH analytes eluting in that range.

³C₉-C₁₂ Aliphatic Hydrocarbons exclude concentration of Target APH Analytes eluting in that range and concentration of C₉-C₁₀ Aromatic Hydrocarbons.

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

^{* =} Due to matrix interference, 1,3-Butadiene results determined by EPA Method TO-15 quantitation method.

⁺⁼ Significant non-petroleum related peaks (i.e. halogenated, oxygenated, terpenes, etc.) are subtracted from the hydrocarbon range areas.