JUN 29 '98 14:48 OHM TRHINING & HES DEPTS.

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OHM Corporation

June 26, 1990

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**Kennin Mathahan From Jacks Complex

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Mr. Paul Groulx On-Scene Coordinator Environmental Protection Agency 16 Wright Avenue Merrimack, NH 02054

Dear Mr. Groulk:

RE: Air Monitoring at New Hampshire Plating

Enclosed please find the interim air monitoring report for the U.S.B.P.A. at New Hampshire Plating. As discussed with Janice Toang, this report is designed to prosent a how and why for the air monitoring as well as provisions for a weekly report. The how and why is covered in Sections 1 and 2; the results and any monitoring modifications are presented in Section 3. Section 3 will begin with a report from the first week of air monitoring and continue to be updated on a weekly basis with program modifications and results. This report will be made available for inspection by any one on site. An outline of the report is provided on page 2. A final report may be in order at the closing of the job.

Sincerely,

Tom Ezartoski Sile Safety Officer

TC: jkc

16406 U.S. Rovie 224 East . P.O. Sex 551 . Findlay, Obs. 45839-0551 . 419-423-3526

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NEW HAMPSHIRE PLATING ADMINISTRATIVE RECORD

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PERIMETER AND PERSONAL AIK MONITORING INTERIM REPORT FOR NEW HAMPSHIRS FLATING COMPANY SITE MERKIMACK, NEW HAMPSHIRE

Submitted to:

U.S. Environmental Protection Agency Region 1 OSC, Paul Groulx

OHM Remodiation Services Corp.

Tom Czartoski Site Safety Officer

Reviewed by:

David Mummert, CIH
Manager, Industrial Hygiene

June 5, 1990 Project 78546

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P. 5

OUTLINE

- 1.0 INTRODUCTION
- 2.0 SAMPLING AND MONITORING PROGRAM
 - 2.1 PERIMETER MONITORING
 - 2.1.1 LOCATION
 2.1.2 CONTAKINANTS: CADMIUM, CHROMIUM, AND
 CYANIDE
 - 2.1.2.a METHOD 2.1.2.b FREQUENCY
 - 2.1.3 CONTAMINANT: PARTICULATES 2.1.4 CONTAMINANT: ORGANIC VAPORS
 - 2.2 PERSONAL MONITORING
 - 2.2.1 CONTAMINANT: CADMIUM, CHROMIUM, AND CYANIDE
 - 2.2.1.8 METHOD 2.2.1.6 FREQUENCY
 - 2.2.2 CONTAMINANT: MYDROGEN CYANIDE 2.2.3 CONTAMINANT: ORGANIC VAPORS
 - 2.3 EQUIPMENT AND PERSONNEL REQUIREMENTS
 - 2.3.1 EQUIPMENT 2.3.2 PERSONNEL
 - 2.4 Laboratories
 - 2.4.1 QUALITY ASSURANCE/QUALITY CONTROL
 - 2.5 SUMMARY
 - 2.6 DISCUSSION
- 3.0 REPORTS

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1.0 INTRODUCTION

For approximately 20 years, the New Hampshire Plating Company (NHPC) provided electroplating services to various local industries. Over this time period, process waste included 11 different metals, cyanides and organic solvents were discharged into a series of 4 lagoons.

The United States EPA has directed CHM Remediation Services Corp. (OMM), a subsidiary of CHM Corporation to remediate these lagoons in a proscribed environmentally sound manner. They have also requested a perimeter and personal air monitoring plan be developed which would demonstrate that onsite activities are not releasing contaminants which are migrating off-site and that employees are adequately protected from airborne contaminants.

2.0 AIR MONITORING

The air monitoring program is divided into two sections: that addressing perimeter monitoring and one for personal monitoring.

2.1 Perimeter Monitoring

Four sensitive populations have been identified surrounding the NHPC site. A preschool facility on the west side, private residences located to the north, Jones Chemical Company bordering the east site and a gravel operation located to the south. The first three areas are at least 1/4 to 1/2 mile from the site. The gravel operation is adjacent to the site.

Carefully, controlled work practices specified in the wo plan should control and contain nearly all of the contaminants during the remedial action. It seems unlikely that any untoward action could tosuit in the generation of airborne contamination. However, with the public interest and recognition of the project and these sensitive areas, air monitoring data which supports the assumption of low to no contaminant release is advised.

2.1.1 Locations

Perimeter monitoring stations will be established on the projects border, roughly in the four cardinal directions but specifically between the site and the preschool facility, north side residences, Cones Chemical and the gravel operation. For specific station locations, refer to the map contained in Appendix A.



2.1.2 Chief Contaminants: Cadmium, Chromium, Cyanides

Ten different metals have been identified in the lagoon sludge. Nowever sampling for each metal is not required if the assumption is made to analyze for the chief contaminants and if they are within acceptable concentration them other metals will also be within acceptable limits. The two selected metals are cadmium [TLV 0.05 milligrams per cubic metet (mg/m²) PEL 0.2 mg/m²] and chromium (TLV and PEL 0.5 mg/m²) which from review of the TAT supplied information, are approximately one order of magnitude above the concentrations of the other metals. Therefore, a surrogate monitoring program seems technically well supported.

The contaminant in the third highest concentration is cyanide (TLV and PEL 5.0 mg/m). In theory, if the cadmium and chromium are controlled, then this material should not be a problem either. However, because of public perception of the cyanide hazard, it is advisable to collect samples for this material.

2.1.2.a Method

Samples will be collected by personal air sampling pumps fitted with 37 millimeter (mm) MCE filter cassettes, operating at a flow rate of approximately 2 1pm for the majority of the work day (7 to 10 hours). Two separate cassettes will need to be run; one for cadmium and chromium; one for cyanide. (This is required because cyanide is analyzed by a different method than chromium and cadmium.)

2.1.2.b Frequency

Samples will be collected upwind and downwind of the site to establish if any concentrations of these materials are pre-existing. Once remedial operations begin, the samples will be collected daily. Once enough data is collected, the monitoring plan will be re-evaluated and modified under the direction of the OSC and OBM CIR.

2.1.3 Contaminant: Particulates

Sampling for the metals and cyanides will require the cassette to be sent off site for analysis to an AFFA approved lab. In order to evaluate real-time conditions, a mini real-time acrossl monitor (mini-ram) will be used to directly munitur respirable particulate being generated by the excavation or pugmill area. The object is to correlate mini-ram measurements to those of the chromium, cadmium, and cyanide samples to develop an action level for dust control measures in a real-time sense.



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2.1.4 Contaminant: Organic Vapors

The solvents discharged into the lagoons seem present in extremely low concentrations in relation to occupational exposure criteria then concentration and vapor pressures are considered. However, there could be potentially unpleasant odors generated from excavation of the lagoons. To quantify these emissions, an HNu PID be used periodically monitor the ambient air and the excavation area.

2.2 Personal Monitoring

OSHA regulations require employee exposure levels be characterized conteminants of concern. Since employees will wear Level C respiratory protestion which provides a protection factor of 50 times the permissible exposuse limit to most substances, the monitoring program does not need to be as intensive as if employees were provided no respiratory protection. Additionally this data can be used to approximately air qualty surrounding the work area.

2.2.1 Contaminants: Cadmium, Chromium, Cyanides

Personal or area samples will be collected in the following locations:

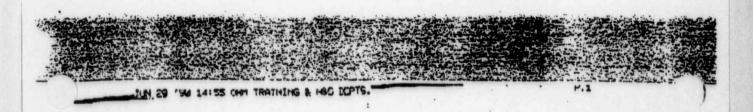
- Inside cab of 215/225 performing the Lagoon excavation
- o Inside cab of loader transferring the excavated
- On personnel who are scrapping the loader bucket or workers in close proximity to the excavation
- o As new tasks arise, additional representative personnel will be monitored

2.2.1.a Method

Pumps and cassettes are the same as previously described in Section 2.1.2.a.

2.2.1.b Frequency

Collect a sample from each identified location during first two weeks of operation. Sased on results, decide if resampling is required. For example, if the results indicate exposure levels are 25 to 40 times the PEL, recampling is required. If results indicate exposure levels are at or below the PEL, barring any radical change in work practice or jobeite conditions, resampling may not be required.



2.2.2 Contaminant: Hydrogen Cyanide (HCN)

As discussed earlier, the generation of any hydrogen cyanide seems unlikely. However, since personnel will be protected by air-purifying respiratory protection, a continuous, real time HCN monitoring device (brand name monitox) will be placed on the 225 operator. An additional Monitox unit will be available for site investigation if required.

2.2.3 Contaminant: Organic Vapors

The HNU PID will be used to monitor work areas to determine concentrations of organic volatiles on a regular basis.

2.3 Equipment and Personnel Requirements

To accomplish this monitoring program, the following personnel and equipment will be required.

2.3.1 Equipment

- HNU PID Model 101 and calibration gas Monitex HCN monitors with generators
- 12 Personal sampling pumps
- Calibration case
- 1 Calibration co

2.3.2 Personnel

1 - Field Sampler or Realth and Safety Technician

2.4 Laboratory

The Industrial hygiene lab will be American Industrial Hygiene Association (ATRA) accredited lab.

2.4.1 Quelity Assurance/Quelity Control

The QA/OC for the air monitoring program will consist of three portions; (1) travel blanks approximately 1 for every 10 samples; (2) duplicates per week which are to be sent to a lab other than the primary lab; (3) reliance upon the labs internal QA/QC program such as spiked samples and other measures. measures.

2.5 Summary

In brief, the original munitoring program will consist of 12 cassette samples per day for cadmium, a PID for organic vapors, an HCN monitox for hydrogen cyanide, and a miniram for particulates. This monitoring will be both for ambient

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air and for personnel exposure. This program will continue as prescribed until a modification is proposed to and accepted by the OSC, Faul Groulx and OHM's Corporate CIR.

2.6 Discussion

This monitoring program was developed to provide a comprehensive defensible yet field workable program to indicate how much, if any, airborne contamination is being generated; how far is it traveling; and are the personnel adequately protected.

The program is established to examine the contaminants in highest concentration, not every compound identified at the site. The rational is that if the highest concentration compounds are not present, then the materials at lower concentration would not be present either. If results indicate low concentrations, reducing the monitoring program to the contaminant in greatest concentration which also has the lowest TLV--cadmium, may be an acceptable modification.

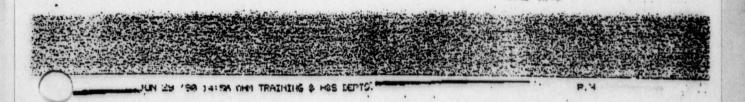
The suggested sampling frequency could also be altered.

If the initial samples show concentrations to be low or below detectable levels, perhaps daily monitoring is not required. However, sufficient sampling must be conducted to validate this assumption.

3.0 REPORTS

This section is a provision provided for the air monitoring mudifications and results to be added on a weekly basis. As each new report is added, it will be given a successive number starting at 3.1 and continuing 3.2, 3.3. etc. until the air monitoring is completed.

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3.1 Results for June 12, 1990 through June 15, 1990

Due to some misunderstandings and confusions, the samples were not sent the samples to an AlHA accredited lab. The lab chosen was Chemserve, Flm Street, Milford, NM 03055.

The results are best presented in table form as follows:

Table 1 - Perimeter Results
Table 2 - Personnel Results
Table 3 - Direct Reading Instruments

The labs analytical report follows the tables.

Perimeter Sampling Results

Table 1

	The second secon	10 No.\Result	TD No.\Result
A-001\B.D.L.	\8.D.L.	A-003\B.D.L.	
A-007\B.D.L.	A-010\3.D.L.	A-012\8.3.L.	A-008\B.C.L.
A-033\.00001 mg/m3	A-035\3.D.L.	A-037\8.D.L.	A-038\B.D.L.
A-044\B.D.L.	4-047\8.D.L.		A-048\.00001 ug/m ³
	A-007\B.D.L. A-033\.00001 eg/e ³	A-007\B.D.L. A-010\3.D.L. A-033\.00001 mg/m ³ A-035\3.D.L.	A-007\B.D.L. A-010\3.D.L. A-012\B.D.L. A-012\B.D.L. A-033\.00001 mg/m ³ A-035\3.D.L. A-037\B.D.L.

Cadelun and Chromium

-	P1	P2	P3	94
Date	ID No.\Result	It No. Result	TO MG. \Result	ID No. \Result
6/12		A-00518.D.L.	A-006\8.D.L.	
6/13	A-016\3.D.L.	A-009\B.D.L.	4-013\E.D.L.	A-011\B. J.L.
6/14	4-034\B.D.L.	4-036\8.D.L.		A-039\B.D.L.
6/15		A-046\9.D.I	A-045\B. J. L.	A-049\B.D.L.

- # --- Indicates no sample due to:

 - o pump failure o media fell off, etc.
- * B.D.L. Below Detectable Limits

ADMINISTRATIVE RECORD NEW HAMPSHIRE PLATING

Date	Sample No.	Personnel	Conc.	Task and Comment
6/13	AP-014	Rick McGanty	8.3.L.	bucket cleaner
	AP-015	Steve St. Martin	B.D.L.	225 operator
	AF-017	Doug Halewood	B.O.L.	936 operator
6/14	AP-026	Rick McGanty	Cr = .0011 mg/s ³ Cd = .001 mg/m	bucket cleaner
	AP-027	Steve fervo	B.D.L.	bucket cleaner
	AP-028	Steve St. Hartin	B.D.L.	225 operator
	AP-029	Doug Halewood	B.D.L.	936 operator
6/15	AP-041	Rick McGanty	$Cx = .0013 \text{ mg/m}^3$ $Cd = .0009 \text{ mg/m}^3$	bucket cleaner
	AP-042	Doug Halewood	B.D.L.	936 operator
	AP-043	Steve Tervo	B.D.L.	bucket cleaner

- + E.D.L. Below Cetectable Limits
- * 225 operator does the actual excavating and loads the 936 with the sludge
- * 936 operator transfers the loaded sludge and dumps it into the stagging area
- * bucket cleaner scrapes off 936 before transfer of sludge to stagging area. Closes: can to excavation process.

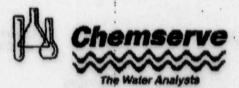
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ADMINISTRATIVE RECORD NEW HAMPSHIRE PLATING

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Direct Reading Instrumentation Results Table 3 Pf0 (in PPH) Monitor (in PPN) Miniram (in mg/m3) Date B.D. L. 6/12 B.D.L. .13 B.D.L. 6/13 B.D.L. .18 6/14 B.D.L. B.D.L. .1 6/15 B.D.L. B.D.L. .123 bemily gaied 62H2 quality of the document NOTICE: If the film image is less clear than this notice, it is due to the ADMINISTRATIVE RECORD NEW HAMPSHIRE PLATING

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OBM CORPORATION 4 RESEARCH WAY PRINCETON, NJ 08540

ATTN: MR. DAVE CEADENHAM

REVISED P15-90-05 05/14/90 06/15/90 06/19/90 YES TOM CZARTOSKI 203518 86750 OEM 7854-E LABORATORY # DATE SAMPLED DATE RECEIVED DATE COMPLETED PICK UP

SAMPLER
PURCHASE ORDER *:
CONTROL *
JOB NUMBER *:

JOB SITE: N.H. PLATING, INC. MERRIMACK, NR 03054

FILTER CASSETTE ANALYSIS (OSHA METHOD TO-121) MODIFIED FOR CYANIDB. NIOSH METHOD 7300

SAMPT.E IDENTITY	TEST PARAMETER	RESULTS	COMPLETED	ANALYST
COMPOSITES				
AP-026	CADMIUM CHROMIUM-T	0.001	06/18/90 06/18/90	MT/CR
AP-027	CYANIDE	<0.00001	06/19/90	CR
AP-028	CADMIUM CHROMIUM-T	<0.0002	06/18/90 06/18/90	MT/CK MT/CR
AP-029	CYANIDE	<0.000004	06/19/90	CK
A-033	CYANIDE	0.00001	06/19/90	CK
∆-034	CADMIUM CHROMIUM-T	<0.0003	06/18/90 06/18/90	MT/CK
A-035	CYANIDE	<0.00001	06/19/90	CK

CONTINUED:

ELM STREET . MILFORD, NH 03055 . PHONE (603) 673-5440

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O.H.M./N.H. PAGE 2 OF 2	PLATING, INC.		LABORATORY 4: FI CONTROL 4: 86	
SAMPLE IDENTITY	TEST PARAMETER	RESULTS	COMPLETED	ANALYST
COMPOSITES				
N-036	CADMIUM-T	<0.0003	06/18/90 06/18/90	MT/CK
A-037	CYANIDE	<0.00001	06/19/90	CK
A-038	CYANIDE	<0.00001	06/19/90	CK

ALL ANALYSES PERFORMED IN ACCORDANCE WITH U.S.E.P.A./CSRA/AISA METHODS. ALL RESULTS ARE IN mg/cubic moter except as NOTED.

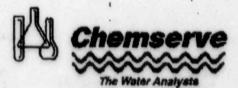
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Chemserve The Water Analysts

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JUN 29 '90 14:58 OHY THAINING & HES DEPTS.



OSM CORPORATION 4 RESEARCH WAY PRINCETON, NJ 68540

ATTN: MR. DAVE LEADENHAM

REVISED
LABORATORY \$: F15-90-06
DATE SAMPLED : 06/15/90
DATE RECEIVED : 06/15/90
DATE COMPLETED : 06/19/90
PICK UP : YES
SAMPLER : TOM CZARTOSKI
PURCHASE ORDER *: 203518
CONTROL \$: 86781
JOB NUMBER * : OHM 7854-E

JOB SITE: N.H. PLATING, INC. MERKIMACK, NH 03054

FILTER CASSETTE ANALYSIS (OSHA METHOD ID-121) MODIFIED FOR CYANIDE. NJOSE METHOD 7300

SAMPLE IDENTITY	TEST PARAMETER	RESULTS	DATE COMPLETED	ANALYST
COMPOSITES				
AP-041	CADMIUM-T	0.0009	06/18/90 06/18/90	MT/CK MT/CK
AP-042	CADMIUM CHROMIUM-T	<0.0003	06/18/90 06/18/90	MT/CK MT/CK
AP-043	CYANIDE	<0.00002	06/19/90	CK
A-044	CYANIDE	<0.00001	06/19/90	CK
A-045	CADMIUM-T	<0.0004 <0.0016	06/18/90 06/18/90	MT/CK
A-046	CAROMIUM-T	<0.00031	05/18/90 06/18/90	MT/CK MT/CK
A-047	CYANIDE	<0.00001	06/19/90	CK

CONTINUED:

ELM STREET . MILFORD, NH 03055 . PHONE (603) 673-5440

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90 14:58 CHM TRATINING & HES DEPTS.

O.H.M./N.H.PLATING, INC. PAGE 2 OF 2

CONTROL #: P15-90-06

SAMPLE IDENTITY

TEST PARAMETER

CYANIDE

COMPLETED

ANALYST

COMPOSITES

A-048

0.00001

06/19/90

CK

A-049

<0.00035 CADMIUM CHROMIUM-T

06/18/90

MT/CK MT/CK

ATL ANALYSES PERFORMED IN ACCORDANCE WITH U.S.E.P.A./OSHA/ATHA METBODS. ALL RESULTS ARE IN mg/cubic meter EXCEPT AS NOTED.

CERTIFIED BY:



Chemserve The Water Analysts

JUN 29 14159 OHM TRAINING & HES DEPTS. P. 11

OHM CORPORATION 4 RESEARCH WAY PRINCETON, NJ 08540

ATTN: MR. DAVE LEADENHAM

JOB SITE: N.H. PLATING, INC. MERRIMACK, NH 03054

REVISED LABORATORY # DATE SAMPLED DATE RECEIVED DATE COMPLETED PICK UP SAMPLER

REVISED P15-90-07 06/14,15/90 06/15/90 06/19/90 YES TOM CTARTOSKI 203518 86782 OHM 7854-E

PURCHASE ORDER #: CONTROL # JOB NUMBER #

PILTER CASSETTE ANALYSIS (OSHA METHOD ID-121) MODIFIED FOR CYANIDE. NIOSH METHOD 7300

SAMPLE IDENTITY	TEST PARAMETER	and the complete and th	DATE COMPLETED	ANALYST
COMPOSITES				
A-039	CADMIUM-T	<0.0003	06/18/90 06/18/90	MT/CK MT/CK
AP-040	CADMIUM CHROMIUM-T	<0.0003	06/18/90 06/18/90	MT/CK
A-050	* CHROMIUM-T	<0.00025mg	06/18/90 06/18/90	MT/CK MT/CK
A-051	* CYANIDE	<0.005mg	06/19/90	CK

* BLANK RESULTS BASED ON 1000 LITERS OF AIR

ALL ANALYSES PERFORMED IN ACCORDANCE WITH U.S.E.P.A./OSHA/AIHA METHODS. ALL RESULTS ARE IN mg/cubic meter EXCEPT AS NOTED.

CERTIFIED BY:



ELM STHEET . MILFORD, NH 03055 . PHONE (803) 673-5440 JUL 02 790 16:38 "SW THESE ORM TRUTHER & THE LEPTS. P.12



OHM CORPORATION 4 RESEARCH WAY PRINCETON, NJ 08540

ATTN: MR. DAVE LEADENHAM

REVISED fl3-90-04 06/13/90 06/13/90 06/15/90 LABORATORY DATE SAMPLED DATE RECEIVED DATE COMPLETED PICK UP YES TOM CZARTOSKI 203518 SAMPLER PURCHASE ORDER

CONTROL # JOB NUMBER # 86747 OHM 7854-8

JOB SITE: N.H. PLATING, INC. MERRIMACK, NH 03054

PILTER CASSETTE ANALYSIS (OSHA METHOD ID-121) MODIFIED FOR CYANIDE. NICSH METHOD 7300

SAMPLE IDENTITY	TEST PARAMETER	RESULTS	DATE COMPLETED	ANALYST
A-001	CYANIDE-T	<0.00001	06/15/90	CK/MT
A-003	CYANIDE-T	<0.00001	06/15/90	CK/MT
A-005	CARMIUM CHROMIUM-T	<0.00058	06/14/90	CK/MT
A-006	CADMIUM CHROMIUM-T	<0.00059	06/14/90	CK/MT
A-007	CYANIDE-T	<0.00001	06/15/90	CK/MT
A-008	CYANIDE-T	<0.00001	06/15/90	CK/MT
A-009	CADMIUM CHROMIUM-T	<0.0004	06/14/90	CK/MT
A-010	CYANIDE-T	<0.00001	06/15/90	CK/MT
A-011	CADMIUM CHROMIUM-T	<0.0004	06/14/90	CK/MT
A-012	CYANTOS-T	<0.00001	06/15/90	CK/MT

ALL AMALYSES PERFORMED IN ACCORDANCE WITH U.S.E.P.A./OSHA/AIHA METHODS. ALL RESULTS ARE IN mg/cubic meter EXCEPT AS NOTED

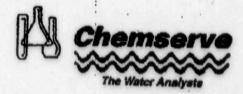
CERTIFIED BY:



ELM STREET . MILFORD, NH 03056 . PHONE (603) 573-5



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OHM CORPORATION 4 RESEARCH WAY PRINCETON, NJ 08540

ATTN: MR. DAVE LEADERHAM

LABORATORY \$: F13-90-03
DATE SAMPLED : 06/13/90
DATE RECEIVED : 06/13/90
DATE COMPLETED : 06/15/90
PICK UP : YES
SAMPLER : TOM CZARTOSKI
PURCHASE ORDER : 203518
CONTROL # : 86748
JOB NUMBER \$: OHM 7854-E

c.

JOB SITE: N. H. PLATING, INC. MERRIMACK, NH 03054

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FILTER CASSETTE ANALYSIS (OSEA METHOD 1D-121) MODIFIED FOR CYANIDE. NIOSH METHOD 7300

SAMPLE IDENTITY	TEST PARAMETER	RESULTS	DATE COMPLETED	ANALYST
A-013	CADMIUM CHRONIUM-1	<0.0003¢ <0.00137	06/14/90	CK/MT CR/MT
AP-014	CYANIDE-T	<0.00001	06/15/90	CK/MT
1.9-015	CAMIUM CHR MIUM-	<0.0009 c <0.0035	06/14/90	CK/MT CK/MT
AP-017	CARGO UM	<0.0081 <0.0322	06/14/90	CK/MT
A-018	CADMIT 1 CHROME STATE	<0.0003 <0.0012	06/14/90	CK/MT
A-025	* CYANI E-T	<0.005mg	06/14/90	CK/MT
A-024	" CAD! .UM	<0.00025mg	06/14/90 06/14/90	CK/MT

* BLANK RESULTS " LED ON 1000 DITERS OF AIR

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ELA: STREET . MILFORD, NH 03056 . PHONE (803) 673-544

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NEW HAMPSHIRE PLATING ADMINISTRATIVE RECORD

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FIRM:	
TELEPHONE:	
FAX NO.:	
0- 00 1-	
FROM: Janne Fellento	
LOCATION: Northeast Region, Windsor	
TELEPHONE: (609) 443-2800	
FAX. NO:	
COMMENTS:	
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