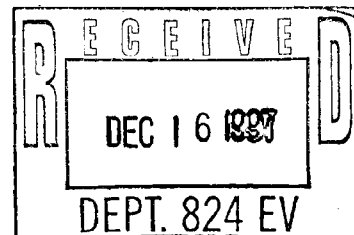




FLUOR DANIEL GTI



December 15, 1997

Mr. David J. Clauson
Environmental Scientist
Sears, Roebuck and Co.
3333 Beverly Road
Department 824EV, A2-238A
Hoffman Estates, Illinois 60179

**Subject: Hydraulic Lift Removal Activities
Sears Facility #1310/6060
4900 Midway Boulevard
Elyria, Lorain County, Ohio
Fluor Daniel GTI Project 01201.0568**

Dear Mr. Clauson:

On behalf of Sears, Roebuck and Co. (Sears), Fluor Daniel GTI, Inc. (Fluor Daniel GTI) has prepared this report to document the removal of three single post hydraulic lift systems at the above-referenced site and to summarize the associated environmental investigation. A site layout sketch is presented on **Figure 1**.

SCOPE OF WORK

Sears initiated this environmental investigation to assess the potential impact of hydraulic fluid on the site's subsurface soil and/or groundwater.

In general, the State of Ohio and the Ohio Department of Environmental Protection (ODEP) do not consider hydraulic fluid to be a state-regulated substance. Based on discussions with the ODEP, the release of hydraulic fluid from a hydraulic lift is considered a reportable release, but the ODEP has not established soil cleanup standards for soils impacted with hydraulic fluid.

However, the ODEP does recommend the use of EPA Method 418.1 for the detection of hydraulic fluid in soil with a guideline of 500 milligrams per kilogram (mg/kg) of total recoverable petroleum hydrocarbons (TRPH) as an indicator of impacted soil. If TRPH concentrations exceed the recommended guideline, and the soil is to be left in place and not excavated from the site, ODEP recommends the soil be further analyzed according to EPA Methods 3560 and 8020 to better determine the types of petroleum constituents that may be present in the soil. Because these potential releases from hydraulic lift systems are currently not regulated by ODEP, submittal of this report to ODEP is not necessary at this time.

Soil Assessment Activities

Soil samples were collected from hand-augered borings and/or backhoe excavations at locations where releases are most likely to occur (e.g. hydraulic cylinders [posts]; underground/aboveground reservoirs; line connections; control valve assemblies). Total depth of each boring or excavation was generally based upon one or more of the following:

- concrete support pads or other types of structures in the hydraulic lift bay
- depth at which groundwater was encountered
- depth at which auger refusal was encountered
- visual or other field observations of the presence or lack of impacted soil (e.g. staining, odor)
- analytical results received from an on-site mobile laboratory

For specific information regarding the number of soil samples collected, and depth of each soil sample, please refer to **Table 1** and **Figures 2** and **3**.

CHRONOLOGY

Field activities and lift removal assessment events are listed chronologically below:

- **August 19, 1997** - Fluor Daniel GTI completed a pre-excavation meeting with the subcontractors, ETSS, and a Sears representative (Bryan Brogle) from the site to discuss the scope of work and health and safety issues. At this time, Fluor Daniel GTI and Mr. Brogle discussed the locations for soil stockpiles, drums, and the potential for underground utilities. ETSS personnel saw cut and removed concrete around the hydraulic lift systems scheduled for removal.
- **August 20, 1997** - Surficial concrete was removed above three semi-hydraulic single-post hydraulic lift systems (HLS #6, HLS #7, HLS #8) by ETSS personnel. Hydraulic fluid remaining in the cylinders was placed into 55-gallon drums and stored on-site for disposal. No reservoirs or piping containing hydraulic fluid were encountered. The lifts were removed and each cylinder was closed in place in accordance with the protocols outlined in Module 10. Soil samples were collected from beneath the lift cylinders for analysis by the on-site mobile laboratory. Soil samples were analyzed on-site for TRPH according to EPA Method 418.1. **Figure 2** presents the location of each soil sample collected. The excavation was backfilled with imported clean fill in preparation for site restoration. Excavated soil was stockpiled on and covered with plastic in preparation for disposal. A composite soil sample was collected for disposal characterization.
- **August 21, 1997** - Site restoration was completed.
- **September 23, 1997** - Stockpiled soil generated from the hydraulic lift removals was loaded and transported to Waste Management's Countywide RDF for treatment. **Attachment A** contains copies of the soil disposal documents.



SITE AND REGIONAL GEOLOGY AND HYDROGEOLOGY

Regional geology beneath the site is characterized as glacial till and lacustrine deposits from 0 to 25 feet bgs overlying shale bedrock, according to the Ohio Department of Natural Resources (ODNR). The deposits are reported to be composed primarily of cohesive calcareous silts and clays.

The drainage characteristics of near-surface soils range from good to poor depending on the composition of glacial materials present. Local drainage is associated with an unnamed intermittent stream, located approximately 1,500 feet southeast of the site. According to the ODNR Groundwater Resources map of Lorain County, the site lies in an area in which less than 3 gallons per minute may be developed from the impermeable deposits of clay and shale.

FIELD OBSERVATIONS

General soil conditions observed during excavation activities and soil sample collection consisted of native mottled brown and gray clay soil. No groundwater was encountered during removal of the lift systems.

ANALYTICAL PROGRAM

Soil samples collected during lift removal activities were analyzed by an on-site mobile analytical laboratory provided by Transglobal Environmental Geochemistry (TEG) Mid-America. Soil samples were analyzed according to EPA Method 418.1 for TRPH. The soil sample exhibiting the highest concentration of TRPH was submitted to and analyzed by TEG's fixed-base laboratory for polychlorinated biphenyls (PCBs) according to EPA Method 8080 and benzene, toluene, ethylbenzene, and xylenes (BTEX) according to EPA Method 8020.

The composite soil sample collected from the stockpiled soils was analyzed at NEI/GTEL Environmental Laboratories, Inc., in Wichita, Kansas (NEI/GTEL), according to the following EPA Methods:

- 8020 for BTEX
- 418.1 for TRPH
- 6000/7000 series for TCLP metals

A copy of the analytical laboratory reports are included as **Attachment B** and summarized in **Tables 1 and 2** and on **Figure 3**.



DISCUSSION OF ANALYTICAL RESULTS

The soil samples analyzed by the on-site mobile laboratory indicated TRPH concentrations ranging from below the laboratory reporting limit to 8 mg/kg. Analytical results for PCB and BTEX in soil sample 7A detected no analytes at or above the laboratory reporting limit. The analytical results are summarized in **Tables 1 and 2** and on **Figure 3**.

CONCLUSIONS AND RECOMMENDATIONS

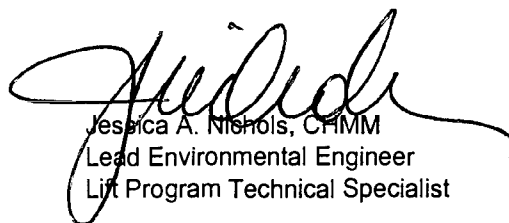
Soil assessment activities in the area of the removed hydraulic lift systems have been completed, and TRPH concentrations in soil remaining in place at the site are below the voluntary cleanup goal of 500 mg/kg. Groundwater was not encountered during removal activities. Therefore, no further action is required at this site. This report has been prepared for Sears files and submittal to the ODEP is not required at this time.

Should you have any questions or comments, please contact Jessica Nichols at (770) 499-9000.

Sincerely,

FLUOR DANIEL GTI, INC.


John A. Frankenthal
Zone Project Manager


Jessica A. Nichols, CHMM
Lead Environmental Engineer
Lift Program Technical Specialist

c: Project Files, Fluor Daniel GTI, Inc., Lenexa, Kansas

Attachments

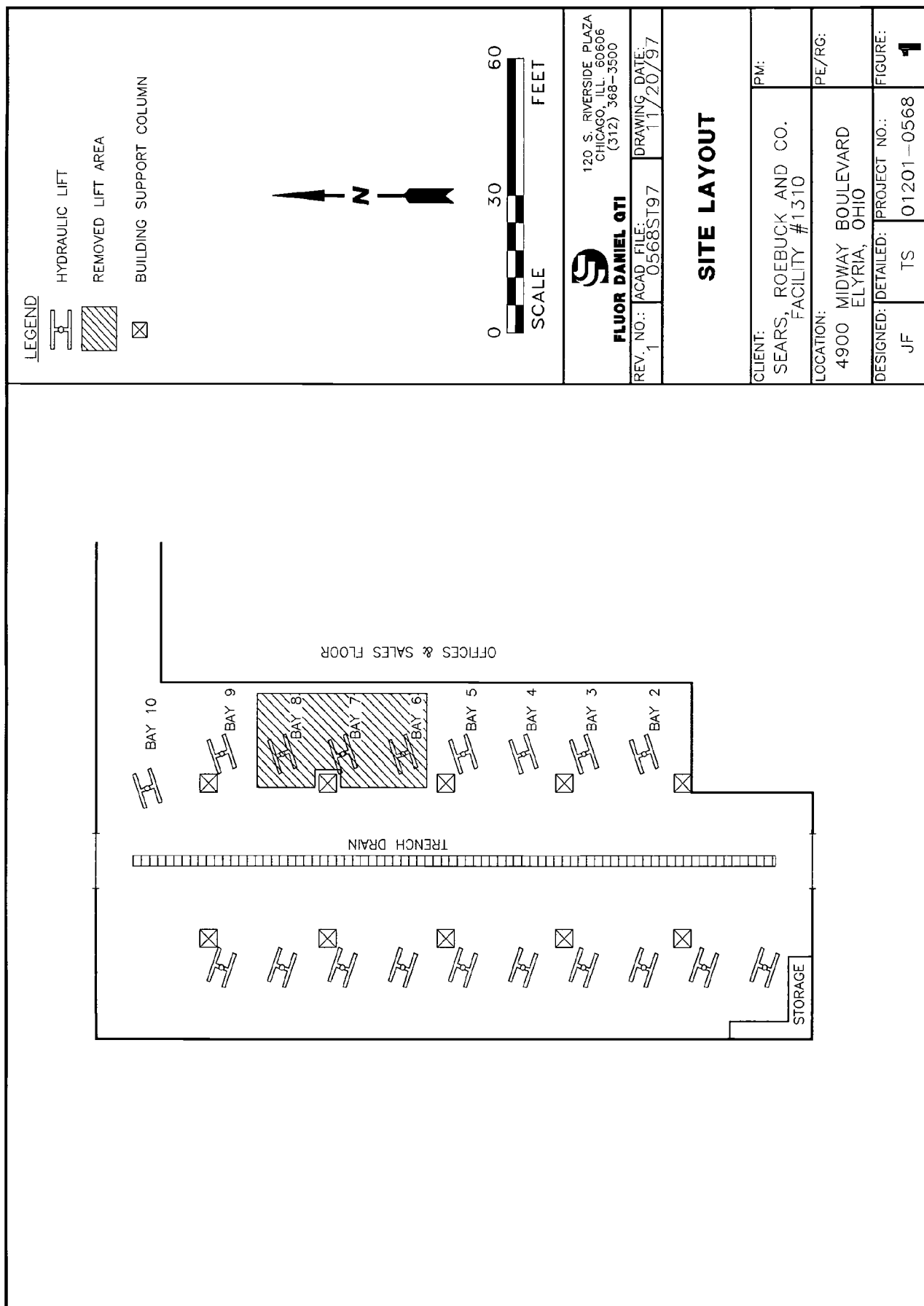
Figures
Tables

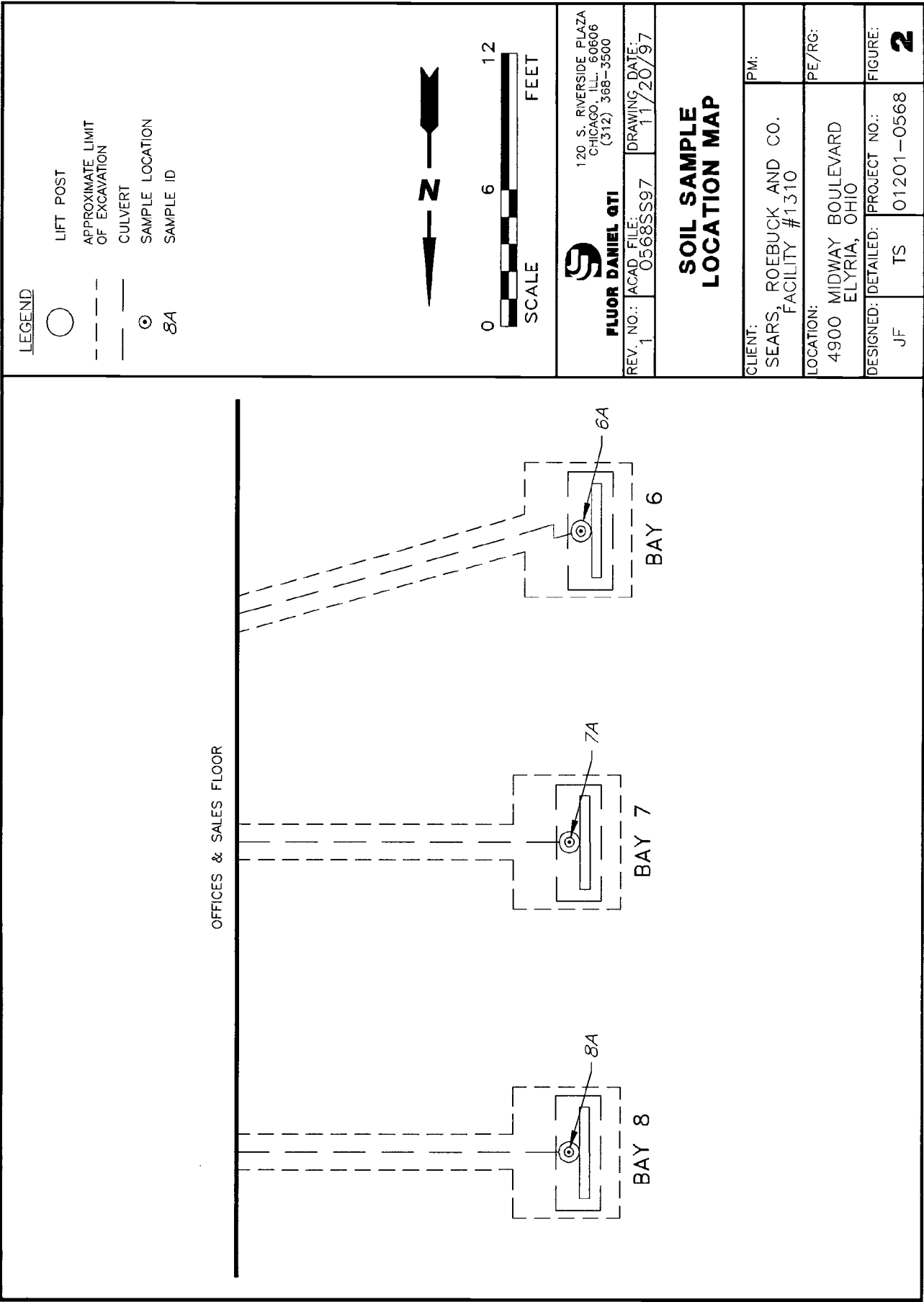
- A. Soil Disposal Documentation
- B. Analytical Laboratory Reports and Chain-of-Custody Documentation

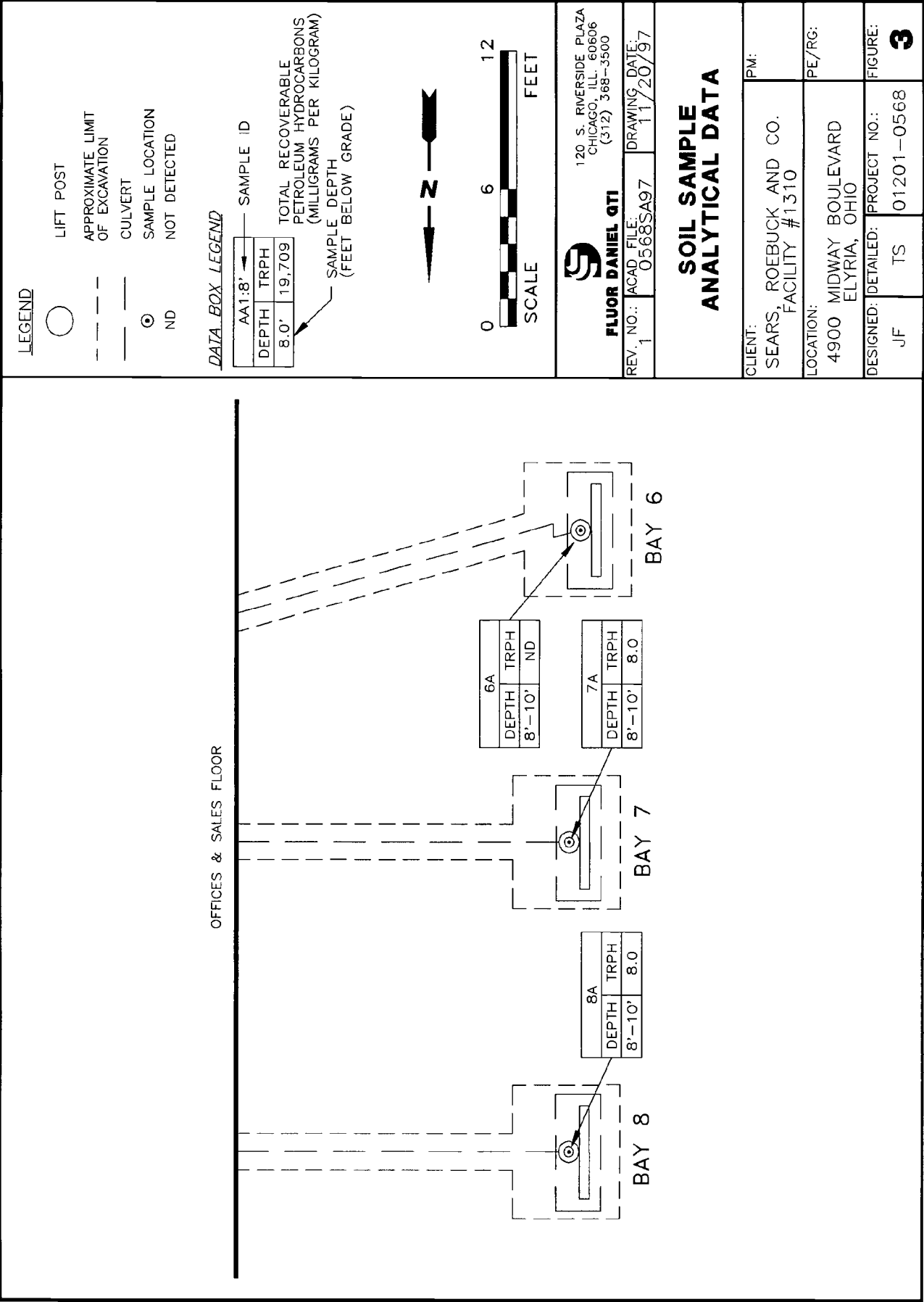


FIGURES

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TABLES

O:\ATLANTA\SEARS1\LIFT\OH_RPTS.JL\ELYRIA.RPT

TABLE 1
Soil Sample Analytical Results

(Results expressed as milligrams per kilogram)

Sears Facility #1310/6060
4900 Midway Boulevard
Elyria, Ohio

Lift System	Sample ID	Sample Location	Sample Date	Sample Depth	TRPH ^a	PCBs ^b	BTEX ^c
HLS #6	6A	bottom	08/20/97	8-10	ND	NA	NA
HLS #7	7A	bottom	08/20/97	8-10	8	ND	NA
HLS #8	8A	bottom	08/20/97	8-10	8	NA	ND

Source: TEG Mid-America, St. Louis, Missouri, 1997

Notes: Depths listed in feet below ground surface (bgs). "NA" indicates the soil sample was not analyzed for that specific method/constituent. "ND" indicates constituents not detected at or above the laboratory reporting limit.

^a total recoverable petroleum hydrocarbons, according to EPA Method 418.1

^b polychlorinated biphenyls, according to EPA Method 8080

^c benzene, toluene, ethylbenzene, and total xylenes, according to EPA Method 8020



TABLE 2
Composite Soil Sample Analytical Results

(Results expressed as milligrams per kilogram, unless otherwise noted)

Sears Facility #1310/6060
4900 Midway Boulevard
Elyria, Ohio

Sample ID	Sample Date	TCLP Metals ^a	BTEX ^b	TRPH ^c
Soil Composite	08/21/97	ND	ND	31

Source: NEI/GTEL Environmental Laboratories, Inc., Wichita, Kansas, 1997.

Notes: "ND" indicates constituent not detected at or above the laboratory reporting limit.

^a toxicity characteristic leaching procedures metals, according to EPA Methods 6000/7000 series; reported in milligrams per liter

^b benzene, toluene, ethylbenzene, and total xylenes, according to EPA Method 8020

^c total recoverable petroleum hydrocarbons, according to EPA Method 418.1



ATTACHMENT A
SOIL DISPOSAL DOCUMENTATION

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NON-HAZARDOUS WASTE MANIFEST NO. 2981

GENERATOR: <u>Sears and Roebuck 1310</u> <u>4900 Midway Blvd.</u> <u>Elyria, Ohio 44035</u> Carrier: <u>JMW Trucking</u> Vehicle No.: <u>37 Box 25-2</u>		DELIVER TO: <input checked="" type="checkbox"/> COUNTYWIDE RDF (E. SPARTA, OHIO) <input type="checkbox"/> ELDA RDF (CINCINNATI, OHIO) <input type="checkbox"/> EVERGREEN RDF (NORTHWOOD, OHIO) <input type="checkbox"/> STONY HOLLOW RDF (DAYTON, OHIO) <input type="checkbox"/> SUBURBAN RDF (BROWNSVILLE, OHIO) <input type="checkbox"/> Company Responsible for Disposal Charges: _____	
Profile No.	Name of Waste Stream	Apx. Volume	Act. Weights
474653	Contaminated Soil		Gross Wt:
			Tare Wt:
			Net Wt:
Account # 0013576			
Generator: _____		Date: _____	
Transporter: <u>JMW Trucking Inc. WLS</u>		Date: <u>9-23-97</u>	
Received at Disposal Facility: <u>Debra S. ...</u>		Date: <u>9-23-97</u>	

DISPOSAL FACILITY

COPY

(DRIVER: PLEASE SIGN BELOW)

011049

REFERENCE NO.
283592

(PLEASE SIGN HERE)

[Signature]

040350 20.00
 TARE 26.00
 NET 14.00
 COUNTRY: OHIO

COUNTYWIDE RDF
 3619 GRACEMONT AVE. S.W.
 EAST SPARTA
 (216) 874-3855
 OH 44626

CONTAINER: 474653 SERIAL: 1310 E10

CUSTOMER NO. 0013576	TRUCK NO. 3720	INITIALS LAS	TIME 14:32:04	DATE 09/23/97	BATCH NO.
--------------------------------	--------------------------	------------------------	-------------------------	-------------------------	------------------

CUSTOMER:	
FLOOR DANIEL GT. INT 120 SOUTH RIVER SIDE 11400 9TH AVE 441060	
MANIFEST NO. 4/4653	PERMIT NO.

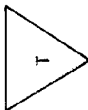
LOAD CODE 1.00	LOAD DESCRIPTION CONTAMINATED SOIL	LOAD QUANTITY 20.000	AMOUNT
TOTAL GROSS WT:			

COPY 1

(DRIVER: PLEASE SIGN BELOW)

011073

REFERENCE NO.
283631



(PLEASE SIGN HERE)

Wesley

GROSS: 23.30
TARE: 16.50
NET: 13.20

COUNTY: LOHAR

COUNTYWIDE RDF

3619 GRACEMONT AVE. S.W. OH 44626
EAST SPARTA
(216)874-3855

COMMENTS: 474653 6000 131.010

CUSTOMER NO.
0013576

TRUCK NO.
3720

INITIALS
LAS

TIME
15:43:00

DATE
09/23/97

BATCH NO.

CUSTOMER:

FLOUR DANIEL GTI, INC.
120 SOUTH RIVERSIDE
1529 9TH FLOOR
CHICAGO

MANIFEST NO.
474653

PERMIT NO.

IL 6000

LOAD CODE
100

LOAD DESCRIPTION
CONTAMINATED SOIL
131.010 131.010

LOAD QUANTITY

AMOUNT

COPY 1

NON-HAZARDOUS WASTE MANIFEST NO. 2980

GENERATOR:

Sears and Roebuck 1310

4900 Midway Blvd.

Elyria, Ohio 44035

Carrier: JMW Trucking

Vehicle No.: 37-Box 25-10

DELIVER TO:

- ☒ COUNTYWIDE RDF (E. SPARTA, OHIO)
☐ ELDA RDF (CINCINNATI, OHIO)
☐ EVERGREEN RDF (NORTHWOOD, OHIO)
☐ STONY HOLLOW RDF (DAYTON, OHIO)
☐ SUBURBAN RDF (BROWNSVILLE, OHIO)

Company Responsible for Disposal Charges:

Profile No.	Name of Waste Stream	Apx. Volume	Act. Weights
474653	Contaminated Soil		Gross Wt: Tare Wt: Net Wt:
Account# 0013576			

Generator: _____

Date: _____

Transporter: JMW Trucking Inc.

Date: 9-23-97

Received at Disposal Facility: Wesley

Date: 9-23-97

DISPOSAL FACILITY

COPY

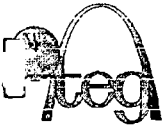
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ATTACHMENT B

**ANALYTICAL LABORATORY REPORTS AND
CHAIN-OF-CUSTODY DOCUMENTATION**

O:\ATLANTA\SEARS\1\LIFT\OH_RPTS\JULI\ELYRIA.RPT

FLUOR DANIEL GTI 



September 8, 1997

Mr. John Frankenthal
Fluor Daniel GTI
120 South Riverside Plaza, Suite 2000
Chicago, IL 60606

SUBJECT: DATA REPORT - Fluor Daniel GTI Project #01201-0568
Sears Facility #1310/6060
4900 Midway Blvd.
Elyria, OH

TEG Project # 970820T4

Mr. Frankenthal:

Enclosed, please find the data report for the above referenced location. Soil samples were analyzed on-site in TEG's mobile laboratory.

Project Summary

The following analyses were conducted:

- 3 soils for total recoverable petroleum hydrocarbons by EPA Method 418.1.
- 1 soil for Benzene, Toluene, Ethylbenzene and Xylenes by EPA Method 8020.
- 1 soil for Polychlorinated Biphenyls by EPA Method 8080.

Samples were received on-site in appropriate containers with appropriate labels, seals, and chain-of-custody documentation.

Project Narrative

The results for all analyses and required QA/QC analyses are summarized in the enclosed tables. All calibrations, blanks, and spike recoveries fulfill quality control criteria.

TEG Mid-America appreciates the opportunity to provide analytical services to **Fluor Daniel GTI** on this project. If you have any questions relating to this data or report, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Hermon Atkinson', is written over a horizontal line.

Mr. Hermon Atkinson
President
TEG Mid-America

cc: Jessica Nichols
Fluor Daniel GTI
1281 Kennestone Circle, NW, Suite 100
Marietta, GA 30066



FLUOR DANIEL GTI PROJECT #01201-0568

Sears #1310/6060
4900 Midway Blvd.
Elyria, OH

TEG Project #970820T4

TRPH (EPA Method 418.1) ANALYSES OF SOILS

SAMPLE NUMBER	DATE ANALYZED	TRPH (mg/kg)
METHOD BLANK	8/20/97	ND
6A (8-10')	8/20/97	ND
6A (8-10') DUP	8/20/97	ND
7A (8-10')	8/20/97	8
8A (8-10')	8/20/97	8

DETECTION LIMITS

5

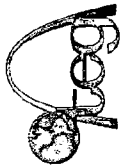
ND INDICATES NOT DETECTED AT LISTED DETECTION LIMITS

ANALYSES PERFORMED ON-SITE IN TEG'S MOBILE LABORATORY

ANALYSES PERFORMED BY: Wes Robb

DATA REVIEWED BY:

Hermon Atkinson
President
TEG Mid-America



FLUOR DANIEL GTI PROJECT #01201-0568
Sears #1310/6060
4900 Midway Blvd.
Elyria, OH

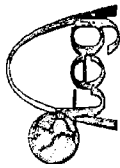
TEG Project #970820T4

BTEX (EPA Method 8020 Modified) ANALYSES OF SOILS

SAMPLE NUMBER	DATE ANALYZED	MTBE (mg/kg)	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYLBENZ (mg/kg)	XYLENES (mg/kg)
METHOD BLANK	9/2/97	ND	ND	ND	ND	ND
8A (8-10')	9/2/97	ND	ND	ND	ND	ND
8A (8-10') DUP	9/2/97	ND	ND	ND	ND	ND

DETECTION LIMITS	0.025	0.025	0.025	0.025	0.025
ND INDICATES NOT DETECTED AT LISTED DETECTION LIMITS					
ANALYSES PERFORMED ON-SITE IN TEG'S MOBILE LABORATORY					
ANALYSES PERFORMED BY: Hermon Atkinson					
DATA REVIEWED BY:					

Hermon Atkinson
President
TEG Mid-America



FLUOR DANIEL GTI PROJECT #01201-0568
Sears #1310/6060
4900 Midway Blvd.
Elyria, OH

TEG Project #970620T4

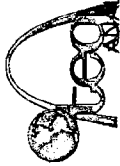
PCB (8080) ANALYSES OF SOILS

SAMPLE NUMBER	DATE ANALYZED	1221 (mg/kg)	1232 (mg/kg)	1242 (mg/kg)	1248 (mg/kg)	1254 (mg/kg)	1260 (mg/kg)	SURROGATE (%REC)
METHOD BLANK	8/29/97	ND	ND	ND	ND	ND	ND	97.0%
7A (8-10')	8/29/97	ND	ND	ND	ND	ND	ND	104.0%

DETECTION LIMITS	0.05	0.05	0.05	0.05	0.05	0.05	0.05	65%-135%
ND INDICATES NOT DETECTED AT LISTED DETECTION LIMITS								
ANALYSES PERFORMED BY: TEG Northwest								
DATA REVIEWED BY:								

Herman Atkinson

Herman Atkinson
President
TEG Mid-America



QA/QC REPORT - MS/MSD DATA

ANALYSIS DATE : 08/20/97

TEG Project #970820T4

MATRIX SPIKE (MS) / MATRIX SPIKE DUPLICATE (MSD) FOR SOILS								
COMPOUND	SPK CONC (mg/kg)	MS CONC (mg/kg)	%REC MS	MSD CONC (mg/kg)	%REC MSD	RPD	ACCEPTABLE RPD	ACCEPTABLE RECOVERY

TRPH	500	492	98.4%	509	101.8%	3.4%	15%	75% - 125%
------	-----	-----	-------	-----	--------	------	-----	------------

ANALYSIS DATE : 09/02/97

MATRIX SPIKE (MS) / MATRIX SPIKE DUPLICATE (MSD) FOR SOILS								
COMPOUND	SPK CONC (ug/kg)	MS CONC (ug/kg)	%REC MS	MSD CONC (ug/kg)	%REC MSD	RPD	ACCEPTABLE RPD	ACCEPTABLE RECOVERY

MTBE	50.0	52.4	104.9%	56.4	112.8%	7.3%	15%	75% - 125%
BENZENE	50.0	50.4	100.8%	54.6	109.2%	8.1%	15%	75% - 125%
TOLUENE	50.0	49.4	98.7%	50.6	101.2%	2.5%	15%	75% - 125%
ETHYLBENZENE	50.0	50.8	101.6%	50.4	100.9%	0.7%	15%	75% - 125%
TOTAL XYLENES	150.0	164.3	109.5%	142.5	95.0%	14.2%	15%	75% - 125%

ANALYSIS DATE : 8/29/97

MATRIX SPIKE (MS) / MATRIX SPIKE DUPLICATE (MSD) FOR SOILS								
COMPOUND	SPK CONC (mg/kg)	MS CONC (mg/kg)	%REC MS	MSD CONC (mg/kg)	%REC MSD	RPD	ACCEPTABLE RPD	ACCEPTABLE RECOVERY

PCB (1254)	1.00	1.12	112.0%	1.05	105.0%	6.5%	15%	75% - 125%
------------	------	------	--------	------	--------	------	-----	------------

SPK CONC - CONCENTRATION SPIKED INTO MATRIX								
MS CONC - ANALYZED CONCENTRATION OF SPIKED SAMPLE								
% REC - PERCENT RECOVERY OF SPIKE FROM MATRIX								
RPD - RELATIVE PERCENT DIFFERENCE BETWEEN MATRIX SPIKE AND MATRIX SPIKE DUPLICATE RECOVERIES								

418.1 ANALYSES PERFORMED ON-SITE IN TEG'S MOBILE LABORATORY

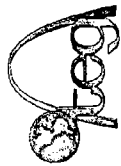
ANALYSES PERFORMED BY: Wes Robb

PCB ANALYSES PERFORMED ON-SITE BY: TEG - NORTHWEST

DATA REVIEWED BY:

Herman Atkinson

Herman Atkinson
President
TEG Mid-America



QA/QC REPORT - CALIBRATION DATA

DAILY CALIBRATION DATE : 08/20/97

TEG Project #970820T4

COMPOUND	INITIAL		INITIAL		%RSD	OPENING		CLOSING / LCS	
	CALIB DATE	RF	AREA	RF		AREA	RF	AREA	%DIFF
TRPH	3/16/95	652.60	0.776	644.33	5.7%	0.776	644.33	0.776	1.3%
MTBE	9/2/97	22.564	569.2	22.77	13.8%	569.2	22.77	576	2.0%
BENZENE	9/2/97	103.00	2749.6	109.98	12.9%	2749.6	109.98	2758	7.1%
TOLUENE	9/2/97	94.21	2369.9	94.80	7.8%	2369.9	94.80	2586	9.8%
ETHYLBENZENE	9/2/97	65.99	1741.0	69.64	10.5%	1741.0	69.64	1665	0.9%
m&p-XYLENES	9/2/97	77.59	3969.0	79.38	12.3%	3969.0	79.38	3875	0.1%
o-XYLENES	9/2/97	45.97	1049.6	41.98	14.1%	1049.6	41.98	1022	11.1%

INITIAL RF - AVERAGE RESPONSE FACTOR FROM MULTIPOINT CALIBRATION CURVE
% RSD - LINEARITY OF MULTIPOINT CALIBRATION CURVE (+/- 20% ACCEPTABLE LIMITS)
AREA - AREA COUNTS FROM DAILY CALIBRATION STANDARD
RF - DETECTOR RESPONSE FACTOR FROM MID-POINT CALIBRATION STANDARD
% DIFF - DIFFERENCE, IN PERCENT, BETWEEN THE AVERAGE RF AND THE OPENING OR CLOSING RF
OPENING - MID-POINT CALIBRATION STANDARD ANALYZED BEFORE SAMPLE ANALYSES BEGIN
CLOSING - MID-POINT CALIBRATION STANDARD ANALYZED AFTER SAMPLE ANALYSES ARE COMPLETE
ANALYSES PERFORMED ON-SITE IN TEG'S MOBILE LABORATORY
ANALYSES PERFORMED BY: Wes Robb
DATA REVIEWED BY:

Hermon Atkinson
President
TEG Mid-America

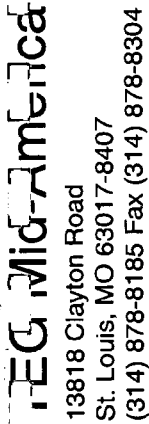


**13818 Clayton Road
St. Louis, MO 63017-8407
(314) 878-6188 Fax (314) 878-8304**

CHAIN-OF-CUSTODY RECOI

張

[illegible]



CHAIN-OF-CUSTODY RECORD
P.O. #: _____

DATE: 8/20/97 PAGE 1 OF _____ OUTSIDE LAB # _____
TEG PROJECT #: 97082074
LOCATION: 4900 Midway Mall Blvd, Elgin, OH
COLLECTOR: ^{WR} James ~~Thompson~~ DATE OF COLLECTION: 8/20

CLIENT: Sans # 6060 / 1310
ADDRESS: 4900 Midway Blvd. / Elgin OH
PHONE: _____ FAX: _____
CLIENT PROJECT #: 01201-0568 PROJECT MANAGER: Jessica Nichols

[illegible]



Midwest Region

4211 May Avenue
Wichita, KS 67209
(316) 945-2624
(800) 633-7936
(316) 945-0506 (FAX)

August 29, 1997

Jessica Nichols
FLUOR DANIEL GTI, INC.
1281 Kennestone Circle Nw
Suite 100
Marietta, GA 30066

RE: NEI/GTEL Client ID: 012010568
Login Number: W7080370
Project ID (number): 012010568
Project ID (name): SEARS/6060/4900 MIDWAY BLVD/ELYRIA/OH

Dear Jessica Nichols:

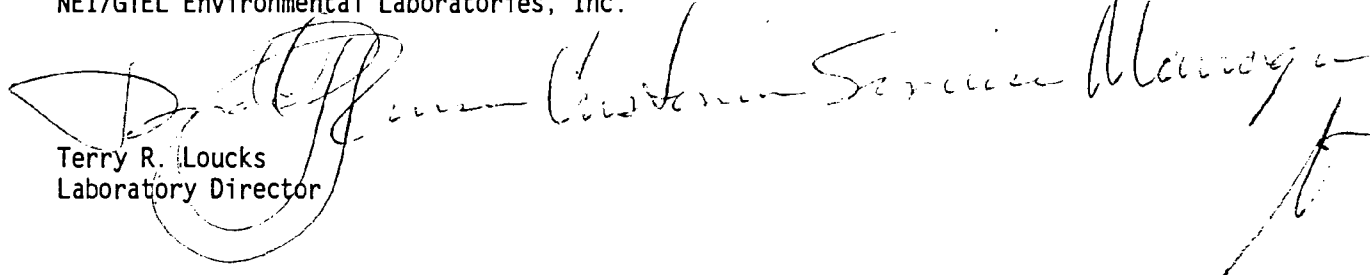
Enclosed please find the analytical results for the samples received by NEI/GTEL Environmental Laboratories, Inc. on 08/22/97 under Chain-of-Custody Number(s) 31298.

A formal Quality Assurance/Quality Control (QA/QC) program is maintained by NEI/GTEL, which is designed to meet or exceed the EPA requirements. Analytical work for this project met QA/QC criteria unless otherwise stated in the footnotes. This report is to be reproduced only in full.

NEI/GTEL is certified by the State of Kansas under Certification Number E-10103.

If you have any questions regarding this analysis, or if we can be of further assistance, please call our Customer Service Representative.

Sincerely,
NEI/GTEL Environmental Laboratories, Inc.


Terry R. Loucks
Laboratory Director

ANALYTICAL RESULTS
Results For Multiple Methods

NEI/GTEL Client ID: 012010568

Login Number: W7080370

Project ID (number): 012010568

Project ID (name): SEARS/6060/4900 MIDWAY BLVD/ELYRIA/OH

Method: See Below

Matrix: Solids

NEI/GTEL Sample Number	W7080370-01	--	--	--
Client ID	WASTE COMPOSITE	--	--	--
Date Sampled	08/21/97	--	--	--
EPA 1311/6010A	Date Prepared	08/28/97	--	--
EPA 1311/6010A	Date Analyzed	08/29/97	--	--
EPA 1311/6010A	Dilution Factor	4.00	--	--
EPA 1311/7470A	Date Prepared	08/29/97	--	--
EPA 1311/7470A	Date Analyzed	08/29/97	--	--
EPA 1311/7470A	Dilution Factor	2.00	--	--

Analyte	Reporting								
		Limit	Units						
Inorganics (MT, WC)									
Arsenic	EPA 1311/6010A	0.10	mg/L	< 0.40	--	--	--	--	--
Barium	EPA 1311/6010A	1.0	mg/L	< 4.0	--	--	--	--	--
Cadmium	EPA 1311/6010A	0.020	mg/L	< 0.080	--	--	--	--	--
Chromium	EPA 1311/6010A	0.020	mg/L	< 0.080	--	--	--	--	--
Lead	EPA 1311/6010A	0.10	mg/L	< 0.40	--	--	--	--	--
Mercury	EPA 1311/7470A	0.0040	mg/L	< 0.0080	--	--	--	--	--
Selenium	EPA 1311/6010A	0.040	mg/L	< 0.16	--	--	--	--	--
Silver	EPA 1311/6010A	0.020	mg/L	< 0.080	--	--	--	--	--

Notes:

Dilution Factor:

Dilution factor indicates the adjustments made for sample dilution.

EPA 1311/6010A:

Digestion for Total Metals by EPA Method 3010A.

EPA 1311/7470A:

Digestion is method specific.

EPA 1311/6010A. EPA 1311/7470A:

"Test Methods for Evaluating Solid Waste, Physical/Chemical Methods". SW-846. Third Edition including Update 2. TCLP is performed as per 40 CFR. Part 261. Appendix II - EPA Method 1311.

NEI/GTEL Wichita, KS

W7080370

ANALYTICAL RESULTS
Volatile Organics

NEI/GTEL Client ID: 012010568

Login Number: W7080370

Project ID (number): 012010568

Method: EPA 8020A

Project ID (name): SEARS/6060/4900 MIDWAY BLVD/ELYRIA/OH

Matrix: Low Soil

NEI/GTEL Sample Number W7080370-01

Client ID WASTE COMPOSITE

Date Sampled 08/21/97

Date Analyzed 08/26/97

Dilution Factor 1.00

Reporting

Analyte	Limit	Units	Concentration:Wet Weight
Benzene	1.0	ug/kg	< 1.0
Toluene	2.0	ug/kg	< 2.0
Ethylbenzene	2.0	ug/kg	< 2.0
Xylenes (total)	4.0	ug/kg	< 4.0
Percent Solids	--	%	82.0

Notes:

Dilution Factor:

Dilution factor indicates the adjustments made for sample dilution.

EPA 8020A:

"Test Methods for Evaluating Solid Waste. Physical/Chemical Methods". SW-846. Third Edition including promulgated Update II.

ANALYTICAL RESULTS
Total Petroleum Hydrocarbons

NEI/GTEL Client ID: 012010568

Login Number: W7080370

Project ID (number): 012010568

Project ID (name): SEARS/6060/4900 MIDWAY BLVD/ELYRIA/OH

Method: EPA 418.1 MOD

Matrix: Solids

NEI/GTEL Sample Number	W7080370-01	--	--	--
Client ID	WASTE COMPOSITE	--	--	--
Date Sampled	08/21/97	--	--	--
Date Prepared	08/26/97	--	--	--
Date Analyzed	08/27/97	--	--	--
Dilution Factor	1.00	--	--	--

Analyte	Reporting Limit	Units	Concentration	Wet Weight
Total Petroleum Hydrocarbons	10.	mg/kg	31.	--
Percent Solids	--	%	82.0	--

Notes:

Dilution Factor:

Dilution factor indicates the adjustments made for sample dilution.

EPA 418.1 MOD:

Methods for Chemical Analysis of Water and Wastes. EPA 600/4-79-020. US EPA. Extraction modified for soils using EPA 3550 (sonication).

NEI/GTEL Wichita, KS

W7080370

