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November 16, 2010

Kimberly N. Tisa
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, MA 02109-3912

Re: **Phase II Characterization Sample Re-Analysis, Docket No. TSCA-01-2006-0060**
500 Flatbush Avenue, Hartford, Connecticut

Dear Ms Tisa,

Weston Solutions, Inc. has received analytical results of the analysis of 18 selected reserve soil samples from the Danny Corp property located at 500 Flatbush Avenue, Hartford, Connecticut (Site). These samples were collected at the same time as primary samples (May 1 through May 10, 2007) and were kept in frozen storage at the laboratory. The primary samples were previously extracted by the Accelerated Solvent Extraction (ASE) method (EPA Method 3545) and analyzed for polychlorinated biphenyls (PCB) by EPA Method 8082. The reserve samples were analyzed using Soxhlet extraction (EPA Method 3540C) and were also analyzed for PCBs by Method 8082. These reserve sample results are summarized in Table 1. Comparison of the of primary and reserve sample analysis results are summarized in Table 2.

The laboratory informed Weston that they were not in possession of certain reserve grab samples included on the list that Weston sent to EPA by email on September 24, 2010. These samples had been disposed of in March 2008. The disposed samples were from composite samples that contained PCB concentrations that were less than half of the composite-normalized EPA cleanup level. At the time the samples were disposed of it was not thought that samples at this concentration level would require re-analysis. The disposed samples included a grab from the Shredder Area (SOF2R), grabs associated with five composite samples from the South Yard Drainage Area (Composite Nos. 21, 30, 31, 34, and 35), and from the Main Building Area (Composite 1).

Additional samples will be collected from the disposed sample locations as part of the scope of work in the Amended Phase II Characterization work plan. The location of these sample points can be determined to within one foot of their original location using the sample location GPS database.

Weston is preparing an amendment to the Phase II Characterization Work Plan to further define the limits of soil containing PCB concentrations exceeding applicable EPA and CTDEP PCB cleanup limits. Weston will use the higher of the ASE/Soxhlet extracted PCB concentrations in evaluating compliance with PCB cleanup levels. As we have indicted to EPA in the past, all

future samples collected from the site for PCB analysis will be extracted using the Soxhlet method.

Regards,
Weston Solutions, Inc.

John L. Meyer, LEP
Project Manager

cc: M. Suisman, Danny Corporation
A. Kosloff, Esq., Levy & Droney, LLP
D. Johnson, Esq., Murtha Cullina, LLP
J. Woodyard P.E., T. Walles, Weston

Attachments:
Table 1
Table 2

TABLE 1

DANNY CORP
500 FLATBUSH AVENUE, HARTFORD CONNECTICUT
SOIL SAMPLE RE-ANALYSIS LIST

The following soil samples from the 500 Flatbush Avenue site, Hartford, Connecticut were preserved by freezing and analyzed for PCBs using the Soxhlet extraction method (EPA Method 3540C) to further evaluate whether PCB concentrations at the Site exceed applicable EPA and Connecticut DEP PCB cleanup levels. Referenced PCB concentrations are those previously determined using the Accelerated Solvent Extraction (ASE) method (EPA Method 3545).

Grab samples not previously analyzed which were analyzed using Soxhlet Extraction

DCSYDA-0507-SO136-01
DCSYDA-0507-SO137-01
DCSYDA-0507-SO138-01

Samples previously analyzed by ASE which were re-analyzed by Soxhlet Extraction (ASE extraction PCB concentrations in parentheses)

DCSYDA-0507-CSO-135,136,138,138-01 (2.160 mg/kg)

DCSYDA-0507-SO129-01 (9.410 mg/kg)

DCCSA-0507-SO6-01 (7.330 mg/kg)
DCCSA-0507-SO8-01 (8.460 mg/kg)

DCOHC-0507-SO7-01 (9.750 mg/kg)
DCOHC-0507-SO9-01 (8.490 mg/kg)
DCOHC-0507-SO21-01 (9.050 mg/kg)

DCSA-0507-SO16-01 (not analyzed)
DCSA-0507-SO17-01 (7.100 mg/kg)
DCSA-0507-SO22-01 (9.120 mg/kg)
DCSA-0507-SO24-01 (9.260 mg/kg)
DCSA-0507-SO26-01 (8.650 mg/kg)
DCSA-0507-SO27-01 (7.420 mg/kg)
DCSA-0507-SO36-01 (7.820 mg/kg)
DCSA-0507-SO43-01 (9.710 mg/kg)
DCSA-0507-SO48-01 (8.020 mg/kg)
DCSA-0507-SO50-01 (9.070 mg/kg)
DCSA-0507-SO51-01 (7.040 mg/kg)

DCEBH-0507-SO1-01 (8.390 mg/kg)

DCEBL-0507-SO14-01 (8.330 mg/kg)

TABLE 2

Phase II PCB Site Characterization Investigation
Soil Sample Analysis Results
500 Flatbush Avenue, Hartford, Connecticut

Functional Area	Composite Sample Number	Sample Identification	Concentration (mg/kg) ASE Extraction Method (Method 3545)	Concentration (mg/kg) Soxhlet Extraction Method (Method 3540C)
CBS	1	DCCBS-0507-CSO1,2,3,4-01 *	0.439	
	2	DCCBS-0507-CSO5,6,7,8-01	1.590	
	3	DCCBS-0507-CSO13,14,15-01	0.234	
	4	DCCBS-0507-CSO9,10,11,12-01 *	0.543	
	5	DCCBS-0507-CSO16,17,18,19-01	0.310	0.651
	6	DCCBS-0507-CSO20,21,24-01	0.129	
	7	DCCBS-0507-CSO22,23,30-01	<0.107	
	8	DCCBS-0507-CSO25,26,28,29-01	<0.430	
	9	DCCBS-0507-CSO27,35,36,39-01	<0.444	3.175
	10	DCCBS-0507-CSO37,38,45,46-01	<0.105	
	11	DCCBS-0507-CSO40,47,48,49-01	<0.428	
	12	DCCBS-0507-CSO31,32,33,43-01	0.158	
	13	DCCBS-0507-CSO34,41,42,44-01	<0.463	
	14	DCCBS-0507-CSO54,57,58-01	<1.27	
	15	DCCBS-0507-CSO53,55,56	0.224	
	16	DCCBS-0507-CSO50,51,52-01	0.235	
SYDA	1	DCSYDA-0507-CSO4,9,14,18-01	0.289	
	2	DCSYDA-0507-CSO1,2,5,6-01	0.198	0.213
	3	DCSYDA-0507-CSO3,7,8-01	0.039	
	4	DCSYDA-0507-CSO12,13,16,17-01	<0.450	
	5	DCSYDA-0507-CSO10,11,15-01	<0.021	
	6	DCSYDA-0507-CSO21,23,27,28-01	0.188	
	7	DCSYDA-0507-CSO24,29,32,33-01	<0.456	
	8	DCSYDA-0507-CSO19,20,22,26-01	0.261	
	9	DCSYDA-0507-CSO25,30,31,34-01	0.154	
	10	DCSYDA-0507-CSO36,39,40,43-01 *	0.678	
	11	DCSYDA-0507-CSO35,37,38,41-01	0.573	
	12	DCSYDA-0507-CSO42,45,46,48-01	0.215	
	13	DCSYDA-0507-CSO44,47,49,50-01	<0.132	
	14	DCSYDA-0507-CSO52,53,56,59-01	<0.162	
	15	DCSYDA-0507-CSO51,55,58,62-01 *	0.876	
	16	DCSYDA-0507-CSO54,57,60,61-01	0.184	
	17	DCSYDA-0507-CSO66,67,70,71-01	1.400	
	18	DCSYDA-0507-CSO68,69,81,82,-01	0.258	
	19	DCSYDA-0507-CSO83,84,85,93-01	0.263	
	20	DCSYDA-0507-CSO79,80,86,87-01	0.580	3.97
	21	DCSYDA-0507-CSO64,65,72,73-01	3.230	
	22	DCSYDA-0507-CSO63,74,75,108-01 *	1.150	
	23	DCSYDA-0507-CSO76,91,92,90-01	0.957	3.809
	24	DCSYDA-0507-CSO77,78,88,89-01	0.983	

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500 Flatbush Avenue, Hartford, Connecticut

Functional Area	Composite Sample Number	Sample Identification	Concentration (mg/kg) ASE Extraction Method (Method 3545)	Concentration (mg/kg) Soxhlet Extraction Method (Method 3540C)
SYDA	25	DCSYDA-0507-CSO94,95,100,101-01	0.125	
	26	DCSYDA-0507-CSO96,97,102,103-01	0.304	
	27	DCSYDA-0507-CSO98,99,105,106-01	0.197	
	28	DCSYDA-0507-CSO104,112,113,114-01	0.202	
	29	DCSYDA-0507-CSO111,115,116.122-01	1.238	5.14
	30	DCSYDA-0507-CSO107,110,117,118-01 *	1.940	
	31	DCSYDA-0507-CSO109,120,121,126-01	3.340	
	32	DCSYDA-0507-CSO119,123,124,125-01 *	4.500	
		DCSYDA-0507-SO119-01	5.350	
		DCSYDA-0507-SO123-01	1.560	
		DCSYDA-0507-SO124-01	5.920	
		DCSYDA-0507-SO125-01	15.600	
	33	DCSYDA-0507-CSO127,128,129,130-01	15.65	
		DCSYDA-0507-SO127-01	2.550	
		DCSYDA-0507-SO128-01*	3.480	
		DCSYDA-0507-SO129-01*	9.410	**6.93**
		DCSYDA-0507-SO130-01	21.300	
	34	DCSYDA-0507-CSO131,132,133,134-01	1.700	
	35	DCSYDA-0507-CSO135,136,137,138-01	2.160	**0.759**
	G	DCSYDA-0507-S0TP7S4R-01	4.860	
CSA	1	DCCSA-0507-CSO1,3,4-01	<0.432	
	2	DCCSA-0507-CSO2,5,6-01	4.210	10
		DCCSA-0507-SO2-01	3.090	
		DCCSA-0507-SO5-01	1.770	
		DCCSA-0507-SO6-01	7.330	**11.04**
	3	DCCSA-0507-CSO7,8-01	<1.14	
MB	1	DCMB-0507-CSO1,2,3,4-01 *	2.380	
	2	DCMB-0507-CSO5,6,7,8-01	1.370	1.485
	3	DCMB-0507-CSO9,11,12-01 *	0.861	
	4	DCMB-0507-CSO10,13-01	0.192	
OHC	1	DCOHC-0507-CSO3,4,5,6-01 *	6.660	
		DCOHC-0507-SO3-01*	3.020	
		DCOHC-0507-SO4-01*	5.610	
		DCOHC-0507-SO5-01	1.620	
		DCOHC-0507-SO6-01	0.832	
	2	DCOHC-0507-CSO1,2,7-01 *	7.560	10.14
		DCOHC-0507-SO1-01	0.535	
		DCOHC-0507-SO2-01	<2.29	
		DCOHC-0507-SO7-01	9.750	**21.99**

TABLE 2

Phase II PCB Site Characterization Investigation
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500 Flatbush Avenue, Hartford, Connecticut

Functional Area	Composite Sample Number	Sample Identification	Concentration (mg/kg) ASE Extraction Method (Method 3545)	Concentration (mg/kg) Soxhlet Extraction Method (Method 3540C)
OHC	3	DCOHC-0507-CSO8,9,10,12-01 *	16.630	
		DCOHC-0507-SO8-01	2.510	
		DCOHC-0507-SO9-01	8.490	**4.48**
		DCOHC-0507-SO10-01	15.340	
		DCOHC-0507-SO12-01	18.000	
	4	DCOHC-0507-CSO11,13,14,15-01	40.800	
		DCOHC-0507-SO11-01	31.100	
		DCOHC-0507-SO13-01	39.000	
		DCOHC-0507-SO14-01	79.200	
		DCOHC-0507-SO15-01	21.300	
	5	DCOHC-0507-CSO16,17,18,19-01	23.000	
		DCOHC-0507-SO16-01	13.000	
		DCOHC-0507-SO17-01	37.300	
		DCOHC-0507-SO18-01	22.080	
		DCOHC-0507-SO19-01	17.770	
	6	DCOHC-0507-CSO20,21,22-01	4.750	
		DCOHC-0507-SO20-01	21.540	
		DCOHC-0507-SO21-01	9.050	**3.4**
		DCOHC-0507-SO22-01	16.830	
	7	DCOHC-0507-CSO23,24,25-01	2.015	
SA	1	DCSA-0507-CSO1,1A,2,2A-01 *	21.020	
		DCSA-0507-SO1,-01	6.500	
		DCSA-0507-SO1A,-01	2.970	
		DCSA-0507-SO2,-01	36.600	
		DCSA-0507-SO2A,-01	62.700	
	2	DCSA-0507-CSO3,4,6,7-01 *	23.700	
		DCSA-0507-SO3-01	12.800	
		DCSA-0507-SO4-01	13.200	
		DCSA-0507-SO6-01	66.600	
		DCSA-0507-SO7-01	82.500	
	3	DCSA-0507-CSO5,9,12,13-01	12.970	
		DCSA-0507-SO5-01	<0.499	
		DCSA-0507-SO9-01	17.710	
		DCSA-0507-SO12-01	52.500	
		DCSA-0507-SO13-01	150.000	
	4	DCSA-0507-CSO8,10,11,16-01	12.18	
		DCSA-0507-SO8-01	8.460	
		DCSA-0507-SO10-01	69.200	
		DCSA-0507-SO11-01	22.700	
		DCSA-0507-SO16-01	8.280	

TABLE 2

Phase II PCB Site Characterization Investigation
Soil Sample Analysis Results
500 Flatbush Avenue, Hartford, Connecticut

Functional Area	Composite Sample Number	Sample Identification	Concentration (mg/kg) ASE Extraction Method (Method 3545)	Concentration (mg/kg) Soxhlet Extraction Method (Method 3540C)
SA	5	DCSA-0507-CSO17,18,19,20-01	7.660	6.25
		DCSA-0507-SO17-01	7.100	**1.198**
		DCSA-0507-SO18-01	3.980	
		DCSA-0507-SO19-01	13.980	
		DCSA-0507-SO20-01	5.050	
	6	DCSA-0507-SO14,15,24,25-01	5.462	26.84
		DCSA-0507-SO14-01	13.510	
		DCSA-0507-SO15-01	5.040	
		DCSA-0507-SO24-01	9.260	**7.63**
		DCSA-0507-SO25-01	20.000	
	7	DCSA-0507-CSO26,27,33,34-01	6.890	
		DCSA-0507-CSO26-01	8.650	**7.76**
		DCSA-0507-CSO27-01	7.420	**3.99**
		DCSA-0507-CSO33-01	21.200	
		DCSA-0507-CSO34-01	0.551	
	8	DCSA-0507-CSO35,36,43,47-01	7.500	
		DCSA-0507-SO35-01	1.100	
		DCSA-0507-SO36-01	7.820	**11.43**
		DCSA-0507-SO43-01	9.710	**5.64**
		DCSA-0507-SO47-01	4.116	
	9	DCSA-0507-CSO48,49,50,51-01	9.400	
		DCSA-0507-SO48-01	8.020	**4.49**
		DCSA-0507-SO49-01	6.660	
		DCSA-0507-SO50-01	9.070	**3.62**
		DCSA-0507-SO51-01	7.040	**5.059**
	10	DCSA-0507-CSO37,38,44,45-01	2.620	
	11	DCSA-0507-CSO28,29,31,32-01	17.300	
		DCSA-0507-SO28-01	12.910	
		DCSA-0507-SO29-01	2.560	
		DCSA-0507-SO31-01	1.270	
		DCSA-0507-SO32-01	10.200	
	12	DCSA-0507-CSO21,22,23,30-01	11.29	
		DCSA-0507-SO21-01	2.049	
		DCSA-0507-SO22-01*	9.120	**5.63**
		DCSA-0507-SO23-01*	11.200	
		DCSA-0507-SO30-01*	3.740	
	13	DCSA-0505-CSO39, 40, 46-01	5.080	
	14	DCSA-0505-CSO41, 42-01	1.315	
	G	DCSA-0507-S04R-01 *	12.640	
	G	DCSA-0507-S0F2R-01 *	8.630	
	G	DCSA-0507-CBARCH-01*	21.060	
	G	DCSA-0507-SOG3NR-01*	<0.497	
	G	DCSA-0507-S0G2R-01 *	22.900	

TABLE 2

Phase II PCB Site Characterization Investigation
Soil Sample Analysis Results
500 Flatbush Avenue, Hartford, Connecticut

Functional Area	Composite Sample Number	Sample Identification	Concentration (mg/kg) ASE Extraction Method (Method 3545)	Concentration (mg/kg) Soxhlet Extraction Method (Method 3540C)
EBH	1	DCEBH-0507-CSO9,10,13,14-01	0.646	
		DCEHB-0505-SO9-01	0.678	
		DCEHB-0505-SO10-01	<.409	
		DCEHB-0505-SO13-01	<.406	
		DCEHB-0505-SO14-01	<.410	
	2	DCEBH-0507-CSO7,8,11,12-01	1.050	2.043
		DCEHB-0505-SO7-01	0.941	
		DCEHB-0505-SO8-01	0.659	
		DCEHB-0505-SO11-01	0.703	
		DCEHB-0505-SO12-01	1.080	
	3	DCEBH-0507-CSO15,16,17,18-01	3.340	
		DCEHB-0505-SO15-01	2.690	
		DCEHB-0505-SO16-01	1.450	
		DCEHB-0505-SO17-01	1.110	
		DCEHB-0505-SO18-01	1.850	
	4	DCEBH-0507-CSO19,20,21,22-01	0.847	
		DCSA-0507-SO19-01	0.965	
		DCSA-0507-SO20-01	<0.119	
		DCSA-0507-SO21-01	0.128	
		DCSA-0507-SO22-01	<.403	
	5	DCEBH-0507-CSO23,24-01	1.377	
		DCEHB-0505-SO23-01*	<0.130	
		DCEHB-0505-SO24-01	<0.109	
	6	DCEBH-0507-CSO1,2,3-01	2.660	3.177
		DCEHB-0507-SO1-01	8.390	**5.270**
		DCEHB-0507-SO2-01	0.847	
		DCEHB-0507-SO3-01	<0.106	
	7	DCEBH-0507-CSO4,5,6-01	0.989	
		DCEHB-0507-SO4-01	2.291	
		DCEHB-0507-SO5-01	0.932	
		DCEHB-0507-SO6-01	<0.104	
EBL	1	DCEBL-0507-CSO1,3,4,5-01	3.700	
		DCEBL-0507-SO1-01*	3.760	
		DCEBL-0507-SO3-01	0.330	
		DCEBL-0507-SO4-01*	12.450	
		DCEBL-0507-SO5-01	2.970	
	2	DCEBL-0507-CSO2,6,8,9-01	8.550	
		DCEBL-0507-SO2-01*	1.950	
		DCEBL-0507-SO6-01	<.101	
		DCEBL-0507-SO8-01*	21.500	
		DCEBL-0507-SO9-01*	12.800	

TABLE 2

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500 Flatbush Avenue, Hartford, Connecticut

Functional Area	Composite Sample Number	Sample Identification	Concentration (mg/kg) ASE Extraction Method (Method 3545)	Concentration (mg/kg) Soxhlet Extraction Method (Method 3540C)
EBL	3	DCEBL-0507-CSO7,10,11,14-01	20.200	22.8
		DCEBL-0507-SO7-01*	21.000	
		DCEBL-0507-SO10-01	53.700	
		DCEBL-0507-SO11-01	11.600	
		DCEBL-0507-SO14-01*	8.330	**7.89**
	4	DCEBL-0507-CSO12,13,15,16-01	8.610	
		DCEBL-0507-CSO12-01	3.590	
		DCEBL-0507-CSO13-01	6.700	
		DCEBL-0507-CSO15-01	0.590	
		DCEBL-0507-CSO16-01*	1.020	
	5	DCEBL-0507-CSO17,18,21,22-01	1.512	
	6	DCEBL-0507-CSO19,20,24,25-01	1.971	2.057
	7	DCEBL-0507-CSO23,26,27-01	5.370	
		DCEBL-0507-CSO23-01*	0.978	
		DCEBL-0507-CSO26-01	2.180	
		DCEBL-0507-CSO27-01	3.020	
	8	DCEBL-0507-CSO28,29-01	0.975	

Notes:
CBS = CBS Building Area
SYDA = South Yard Drainage Area
CSA Container Storage Area
MB =Main Building Area
SA= Shredder Area
OHC = Overhead Crane Area
EBH = E-Building High Occupancy Area
EBL = E-Building Low Occupancy Area
* Chromatogram indicated an incomplete Aroclor mix in the sample a best estimate of Aroclor concentration was made.
All composite samples highlighted in yellow have PCB concentrations equal to or exceeding the composite-normalized applicable CT DEP PCB cleanup levels.
All grab samples highlighted in blue have PCB concentrations equal to or greater than applicable CT DEP cleanup levels.
BOLD type indicates samples which were submitted for reanalysis by Soxhlet on 10/14/2010.