



## **PERIODIC REVIEW**

**Recomp of Washington**

**Facility Site ID#: 76245362**

**1524 Slater Road**

**Ferndale, Washington**

**Northwest Regional Office**

**SOLID WASTE MANAGEMENT PROGRAM**

**April 2022**

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## 1.0 INTRODUCTION

The Washington Department of Ecology (Ecology) has prepared this periodic review of post-cleanup Site conditions and monitoring data to ensure that human health and the environment are being protected at the Recomp of Washington site (Site).

As described in this review, the Recomp Site was managed under Washington State solid waste regulations, and Ecology subsequently provided a No Further Action (NFA) opinion that considered the cleanup action to be the landfill closure. Ecology required a restrictive covenant under the Model Toxics Control Act (MTCA) that protects the landfill cover and prohibits the release of contamination from the landfill.

The MTCA regulations are provided in Chapter 173-340 of the Washington Administrative Code (WAC). WAC 173-340-420(2) requires that Ecology (also referred to as “the department”) conduct a periodic review of a site every five years under the following conditions:

- (a) Whenever the department conducts a cleanup action;
- (b) Whenever the department approves a cleanup action under an order, agreed order or consent decree;
- (c) Or, as resources permit, whenever the department issues a no further action opinion;
- (d) And one of the following conditions exists:
  - 1. Where an institutional control and/or financial assurance is required as part of the cleanup action;
  - 2. Where the cleanup level is based on a practical quantitation limit; or
  - 3. Where, in the department’s judgment, modifications to the default equations or assumptions using site-specific information would significantly increase the concentration of hazardous substances remaining at the Site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

The Recomp Site requires this review because the landfill cover is an engineered control and requires an institutional control.

When evaluating whether human health and the environment are being protected, the factors the department shall consider include [WAC 173-340-420(4)]:

- (a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the Site;

- (b) New scientific information for individual hazardous substances or mixtures present at the Site;
- (c) New applicable state and federal laws for hazardous substances present at the Site;
- (d) Current and projected Site and resource uses;
- (e) Availability and practicability of more permanent remedies; and
- (f) Availability of improved analytical techniques to evaluate compliance with cleanup levels.

The Department shall publish a notice of all periodic reviews in the Site Register and provide an opportunity for public comment.

## 2.0 SUMMARY OF SITE CONDITIONS

### 2.1 Site Description and History

The Recomp Site includes three current parcels at 1524 and 1526 Slater Road, based on a closed ash landfill on one parcel and an upgradient, soil-bentonite slurry wall that extends onto all three parcels. Appendix 6.1 provides vicinity and parcel maps for the Site. Adak Island Adventures, LLC (ADAK) owns Parcel 99458 that contains the landfill and PES Holdings, LLC owns the east adjacent Parcel 173981 (1526 Slater Road) where the slurry wall is constructed. Parberry Environmental Solutions operates Scrap-It recycling services and Stow-It storage container rental solutions (i.e., Scrap-It Stow-It) on these two parcels. Regional Disposal Company owns Parcel 173983 (1524 Slater Road) and operates a material recovery facility and waste transfer station on the parcel. The slurry wall extends east-to-west, south of the waste transfer building. Table 2.1 identifies three adjoining sites near this address.

**Table 2.1: Cleanup Sites Associated with 1524 Slater Road, Ferndale, Washington**

Cleanup Site Name	Address	Facility Site ID	Cleanup Site ID	Confirmed and Suspected Contaminated Sites List <sup>1</sup>
Recomp of Washington	1524 Slater Road, Ferndale, WA	76245362	378	No
Wilder Landfill	North of 1524 Slater Road, Ferndale, WA	2901	947	Yes
Friese Hide & Tallow	1528 Slater Road, Ferndale, WA	2326838	7470	Yes

Recorded in Ecology’s Integrated Site Information System

The Wilder Landfill site shares a common history with the Recomp Site, but the sites are distinct and this periodic review only applies to the Recomp Site. The Friese Hide & Tallow site is potentially collocated with the Wilder Landfill site.

The Recomp of Washington site was originally part of a larger facility owned by Charles V. Wilder Jr. and operated by Thermal Reduction Company, Inc. (TRC). When TRC sold the

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<sup>1</sup> <https://apps.ecology.wa.gov/cleanupsearch/reports/cleanup/contaminated> The Confirmed and Suspected Contaminated Sites List consists of sites that are undergoing cleanup or are awaiting further investigation and cleanup. Sites that receive a No Further Action determination are removed from the Confirmed and Suspected Contaminated Sites List.

property to Recom in 1990, Charles Wilder Jr. retained ownership of the property north of the access road to the Friese Hide & Tallow Company facility at 1528 Slater Road.

Table 2.2 describes the Site and surrounding parcels, and summarizes solid waste activities performed on those parcels. The Recom of Washington Site is on Parcel Nos. 99458, 173981, and 173983 and the Wilder Landfill site potentially extends onto Parcel Nos. 99453, 175637, and 175689.

**Table 2.2: Site and Surrounding Parcels**

<b>Parcel</b>	<b>Owner</b>	<b>Acreage</b>	<b>Location Description</b>	<b>Solid Waste Facility</b>	<b>Cleanup Site</b>
99458 (Site)	Adak Island Adventures, LLC	10.21	Contains ash landfill and leachate storage lagoon. Formerly contained ash storage facility.	Closed ash landfill, metal recycling	Recomp of Washington
173981 (Site)	PES Holdings, L.L.C.	3.85	Adjoins ash landfill parcel to east. Slurry wall for the landfill is primarily on this parcel.	Metal recycling, past mushroom composting operation in building	Recomp of Washington
173983 (Site)	Regional Disposal Company	3.84	Adjoins ash landfill parcel to south and southeast. Slurry wall extends across parcel.	Material recovery facility, solid waste transfer station	Recomp of Washington
172581	TSA Property Investments LLC	1.80	Partially adjoins ash landfill parcel to south	None	None

<b>Parcel</b>	<b>Owner</b>	<b>Acreage</b>	<b>Location Description</b>	<b>Solid Waste Facility</b>	<b>Cleanup Site</b>
175637	Keith B & Katherine A Dewey  Aeden & Morgan E D Hunter	2.28	Adjoins ash landfill parcel to north  North of access road to former Friese Hide & Tallow facility.	Hazardous waste pit	Wilder Landfill
99453	Bel Pac Trading, Inc.	4.30	Adjoins hazardous waste pit parcel to west  North of surface impoundment on ash landfill parcel	Hazardous waste pit impacts not delineated	Wilder Landfill
175689	Whatcom County	39.73	Adjoins hazardous waste pit parcel to north and east  Adjoins ash landfill parcel to north	Hazardous waste pit impacts not delineated	Wilder Landfill
	Railroad easement		Adjoins ash landfill parcel to west	None	None



<b>Parcel</b>	<b>Owner</b>	<b>Acreage</b>	<b>Location Description</b>	<b>Solid Waste Facility</b>	<b>Cleanup Site</b>
99444	Washington State	76.42	Adjoins railroad easement to west  Contains Brennan Pond	None	None

Whatcom County Tax Parcel Viewer, <sup>2</sup>[Whatcom County Tax Parcel Viewer](https://www.whatcomcounty.us/2979/Map-Portal)

The Site and surrounding parcels were undeveloped farmland prior to 1974. In 1974, Wilder Construction Company, Inc. (Wilder) prepared an Environmental Impact Statement to develop a 100-ton per day solid waste incinerator and disposal site. Whatcom County Health Department (then the Bellingham Whatcom District Department of Public Health) granted a Solid Waste Handling Permit for the facility. The 100-ton-per-day incinerator generated about 30 tons per day of combined bottom and fly ash.

In approximately 1977, Whatcom County Health Department granted a permit to Thermal Reduction Company (TRC) to operate a hazardous waste landfill on property north of the Friese Hide & Tallow facility access road. This landfill, commonly referred to as the “Wilder landfill hazardous waste pit,” was closed in 1979. The hazardous waste pit is part of the Wilder Landfill site and not subject to this periodic review.

Thermal Reduction Company purchased the Site property from Wilder in 1985 and continued to operate the incinerator and ash landfill until Recomp Inc. purchased the property in 1989. Recomp of Washington (Recomp) continued operating the facility with modifications to remain current with the community’s solid waste handling needs and the evolving regulatory requirements. Recomp closed the ash landfill and constructed a temporary ash storage facility. Recomp replaced the existing electrostatic precipitator for the incinerator with an acid-gas scrubber and baghouse. Recomp also started a recycling facility that included a material recovery facility and a composting facility. Recomp sold its solid waste transfer station in 1990 to what is now Regional Disposal Company. Regional Disposal Company operates a material recovery facility and waste transfer station on the Site, which are permitted by Whatcom County Health Department.

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<sup>2</sup> <https://www.whatcomcounty.us/2979/Map-Portal>

## 2.2 Hydrogeological Investigation

Golder Associates (1988) evaluated the hydrogeological setting for the Site. Monitoring wells MW-1 to MW-11 were installed around the landfill in 1987 and 1988, and MW-2 was abandoned during this period. The Site is underlain by the Bellingham Drift formation. The Bellingham Drift is a glaciomarine drift that consists of unsorted and unstratified, gravelly-sandy silt and gravelly clay with occasional shell fragments. The Bellingham Draft has a relatively low permeability, with discontinuous water bearing units. Golder Associates reports that the vertical permeability of three undisturbed soil samples from silt and clay deposits within the Bellingham Drift were about  $10^{-8}$  centimeters per second, which impedes vertical migration of contamination. All but one of the monitoring wells at the Site are screened in the Bellingham Drift formation, and groundwater flows in a westerly direction.

The Sumas Outwash Sand formation overlies the Bellingham Drift on the eastern portions of the Site. The Bellingham Drift was encountered at 32 and 27 feet below ground surface in MW-1 and MW-4. Monitoring well MW-7 is the only well screened in the Sumas Outwash Sand. The Sumas Outwash Sand consists of stratified coarse-to-fine sand and silt with traces of fine gravel and clay. The Sumas Outwash Sand is approximately 30 feet thick on the eastern portion of the Site, but not encountered on the western portion of the Site, west of the ash landfill along the railroad easement. Groundwater discharges in a westerly direction and seeps occur along the contact of the Sumas Outwash Sand and Bellingham Drift formations.

## 2.3 Hazardous Waste Pit at Adjacent Wilder Landfill

Weston Solutions (2003) prepared a Preliminary Assessment/Site Inspection (PA/SI) report for the Wilder Landfill on behalf of EPA in accordance with regulations under the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), sometimes called Superfund. TRC began disposing waste in the hazardous waste pit in the summer of 1976, when they received a permit from Whatcom County Health Department. Waste deposited into the hazardous waste pit included “approximately 1,000 partially-full oil and resin drums, solvents, asbestos, catalyst beads from refineries, lignosite from Georgia-Pacific..., pentathol (sic) from Crossarm and Bailey Lumber” and “insecticide from the highway department.” Lignosite is a wood pulp product that was mixed with metal plating sludge to make a drilling mud additive, with elevated concentrations of chromium. Whatcom County Health Department revoked the disposal permit in the spring of 1979. Waste disposal stopped when the permit was revoked, but other sources indicate the pit was in operation until 1983. Wilder sold the property south of the Friese Hide and Tallow access road to TRC in 1985, but retained ownership of the property with the hazardous waste pit. The PA/SI reports coordinates on current Parcel No. 175689, but Figures 2-1 and 2-2 in the PA/SI report indicates the approximate boundary of the Wilder Landfill extends on Parcels Nos. 175637 and 99453.

Based on their review, EPA (2003) does not anticipate further investigation under the federal Superfund Program. EPA (2003) stated that EPA’s no further action designation does not relieve the facility from complying with appropriate Washington State regulations. The hazardous waste

pit is located on the adjacent Wilder Landfill site and was specifically excluded from the April 23, 2003 NFA request for the Recompile of Washington Site.

## 2.4 Ash Landfill

Wilder (1974) proposed to build a 100-ton per day incinerator and disposal site on the Recompile Site with a planned construction start date of July 15, 1974. The previous municipal solid waste landfill used by the City of Bellingham at another location was required to close by June 30, 1974 because it did not meet the minimum functional standards for solid waste handling in WAC 173-301 (implemented on October 26, 1972). Solid waste incineration was proposed because of the scarcity of available landfill sites, prevailing high groundwater tables, and public opposition to landfilling. Wilder reported that incinerator ash requires about 10 to 20 percent of the volume of normal landfill disposal.

Wilder (1974) stated the property was divided into two terraces caused by erosion of the Nooksack River, located about 3,000 feet west of the property. The upper terrace elevation on the east side of the property ranged from 43 to 55 feet, while the lower terrace elevation ranged from 16 feet at a pipe invert beneath the railroad along the west property boundary to 30 to 36 feet at the toe of the upper terrace. A topographic map of the Site prior to landfilling is provided in Appendix 6.2 (Wilder, 1974).

Wilder (1974) specified the ash landfill would be constructed on the lower terrace by:

1. “Divert by ditching, the existing surface drainage from surrounding areas around the perimeter of the lower terrace.”
2. “Remove sufficient clay from the lower terrace to form a berm along the westerly and northerly boundary of the lower terrace to blanket the sand slope on the east to a depth of four feet, and for use as cover soil of landfill. Removal of clay shall in no case be greater than four feet above the depth at which water seepage occurred in the sample pits. Top elevation of the top of the berm shall be approximately at the same elevation as the railroad tracks along the westerly boundary, and rise easterly along the northerly boundary to equal the elevation of the upper terrace.”
3. “The above conditions will form a containing basin with the low point immediately east of the existing culvert outlet<sup>3</sup> where a holding pond will be constructed. From this point, a monitoring system will be installed...”

Washington implemented new minimum functional standards for solid waste handling in WAC 173-304 on November 27, 1985, and repealed WAC 173-301. Washington implemented solid waste regulations in WAC 173-304 that are consistent with the federal Resource Conservation and Recovery Act (RCRA) of 1976, and that provide prescriptive landfill closure standards, post-

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<sup>3</sup> Thermal Reduction Company (1989) Figure 2 in Appendix 6.3 shows a 36-inch culvert beneath the railroad line adjoining the southwest corner of the current wastewater lagoon on the northwest corner of the property.

closure care requirements, and financial assurance requirements. WAC 173-304 was subsequently updated on October 4, 1988. Owners and operators that had a landfill closure plan approved by the jurisdictional health department and are closing before November 27, 1989, were not subject to post-closure care and financial assurance requirements (WAC 173-304-400(3)(b)). TRC closed the ash landfill such that Whatcom County Health Department did not require post-closure care or financial assurance in the landfill permit issued under WAC 173-304.

Harper Owes (1989) prepared an engineering report that depicts (Figure 2, Appendix 6.3) a closed ash landfill area in the northwest corner of the property and an active ash landfill area along the west property boundary in the middle of the property (from north-to-south). The two ash landfill areas are in the lower terrace deposits, on the west side of the property. Harper Owes reported that fly ash and bottom ash from the two 50-ton per day incinerators were disposed in the landfill areas and in a temporary ash pile placed on the active landfill area.

Harper Owes reported that the two landfill areas were constructed by excavating material to form pits, and then ash was deposited in the pits to form cells. The native, low-permeability clay soils inhibit the migration of leachate, and a containment berm was constructed around the landfill area to control surface water movement and to prevent leachate from migrating offsite. Leachate generated by precipitation falling directly on the surface was drained to a holding pond at the northwest corner of the property and then pumped to City of Ferndale wastewater collection system.

Harper Owes (1989) proposed landfill improvements to bring the landfill into compliance with WAC 173-304. They planned to remove the ash stored on the active landfill and to regrade the two landfill areas and construct a minimum two-foot compacted clay cover with a permeability of less than  $10^{-6}$  centimeters per second.

Harper Owes (1989) report that several leachate seeps were present along the west side of the ash landfill areas. They proposed to construct a lined cutoff trench with a perforated drainpipe (a French drain) along the west side of the ash landfill areas to collect these seeps and convey the seepage to a leachate storage pond in the northwest corner of the property. Harper Owes stated that the depth of the collection pipe would be below the elevation of the identified seeps such the pipe would collect stored water that is contained in the existing stored ash and discharged via the seeps. Figure 12 in Appendix 6.4 (Recomp, 1996) shows a cross-section with the gravel interceptor trench and 10-inch perforated leachate collection pipe on the west side of the closed ash landfill. Harper Owes (1989) stated the leachate would be discharged to the City of Ferndale wastewater treatment plant.

Although Whatcom County Health Department determined that the ash landfill was not subject to post-closure care requirements in WAC 173-304, Harper Owes' (1990) Plan of Operations included maintenance tasks for the closed ash landfill, including:

- Ensure perforated drain collector along the western edge of the landfill continues to function as necessary.

- Ensure the leachate storage lagoon and pump station continues to function.
- Maintain the landfill liner and grass cover.
- Continue groundwater and surface water monitoring.

Golder (1990) proposed the construction of a soil-bentonite slurry wall to inhibit the lateral migration of groundwater through the ash landfill areas. The proposed slurry wall extends along the west side of Slater Road and ties into existing compacted clay berms on the west and north sides of the ash landfill areas. The proposed slurry wall extends along the north and east boundaries of current Parcel 173981, extends west through current Parcel 173983 south of the former incinerator and waste receiving building, and then extends northwest along the west property boundary of current Parcel 99458 to the southern extent of the closed ash landfill. The slurry wall was designed to divert groundwater in the Sumas Outwash Sand formation around the closed ash landfill and the overlying temporary ash storage facility. The slurry wall was proposed to be three-feet-thick and to extend three feet into the underlying Bellingham Drift formation. The slurry wall was proposed to be constructed of a mixture of Sumas Sand and Bellingham Drift clay, with potential bentonite clay augmentation to achieve a target permeability of  $10^{-7}$  centimeters per second. Figure 2 in Appendix 6.4 (Recomp, 1996) depicts the location of the slurry wall. The area between the compacted clay landfill cover and the slurry wall is currently covered by paved surfaces and buildings. Groundwater diverted around the slurry wall would discharge to the drainage swale on the west side of the property, along the railroad easement, and potentially infiltrate into the French drain for the closed ash landfill. Figure 12 in Appendix 6.4 (Recomp, 1996) depicts the leachate collection pipe elevation to be slightly below the groundwater level in shallow monitoring well MW-10 and several feet<sup>4</sup> below the groundwater levels in deeper monitoring wells MW-3 and MW-5.

## 2.5 Ash Storage Facility

In 1988, the Washington State Legislature enacted the “Washington Ash Act,” which governed the generation and disposal of ash from incinerators that qualified for the Federal Ash Exclusion, (Chapter 70A.315, Revised Code of Washington, RCW). Ecology promulgated special incinerator ash management standards in WAC 173-306, effective May 31, 1990. Recom constructed an onsite storage facility for the incinerator ash in 1989, prior to the implementation of WAC 173-306.

Harper Owes (1989) reported that the incinerator processed 100 tons per day of solid waste, generating approximately 30 tons per day of combined bottom and fly ash. They estimated that the incinerator generates 11,000 cubic yards of ash per year and that 38,000 cubic yards of ash were stored atop the active ash landfill area at the time. Harper Owes specified the design of an ash storage facility that enables storage of 78,812 cubic yards of ash, which provided storage

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<sup>4</sup> Groundwater and leachate collection pipe elevations depicted in Figure 12 (Appendix 6.4) assumed as estimates.

capacity for the existing 38,000 cubic yards of ash in storage and three years of estimated ash generation.

Harper Owes (1989) specified that the temporary ash storage facility would be constructed in Phase I and II cells on top of the closed ash landfills. The landfills are closed with a two-foot compacted clay layer. The specified bottom liner for the ash storage facility included an 80-mil, high-density polyethylene (HDPE) geomembrane on top of the two-foot compacted clay layer, overlain by 18 inches of compacted native soil and four inches of asphalt. Harper Owes specified the temporary ash storage facility to have a two-foot-high by two-foot-wide perimeter berm, constructed of compacted soil with a 2H:1V (horizontal to vertical) side slope covered by an 80-mil HDPE geomembrane to prevent fluid movement through the berm.

Recomp staged incinerator ash in the ash storage facility from 1989 to May 2, 1994, under permits issued by Whatcom County Health Department and Ecology. The permits required Recom to perform regular monitoring of groundwater, surface water, and air in the vicinity of the solid waste facilities (see Section 2.8).

## 2.6 Leachate Storage Lagoon

The leachate storage lagoon is located on the northwest corner of the Site. TRC (1989) stated that the new leachate storage lagoon is a modification of the existing leachate storage lagoon. The new leachate storage lagoon was specified to be lined with an 80-mil HPDE liner over two feet of compacted clay. The total depth of the pond is 15 feet and the side walls have a 2.5H:1V side slope. The lagoon is designed to hold 55,000 gallons with eight feet of water and seven feet of freeboard. The inside dike dimensions are 85-feet-by-85-feet and the water surface dimensions are 48-feet-by-48-feet.

The lagoon receives water collected by the leachate collection pipe installed along the west side of the ash landfill and various wastewater streams from Scrap-It Stow-It's and Regional Disposal Company's operations. Although the leachate collection pipe was originally intended to collect seepage water from the closed ash landfill (Harper Owes, 1989), the slurry wall (Golder, 1990) and paved surfaces inhibit lateral groundwater migration and surface water infiltration through the closed ash landfill. The slurry wall diverts groundwater within the Sumas Outwash Sand formation around the closed ash landfill, and the shallow groundwater west of the closed ash landfill likely discharges to the leachate collection pipe (Figure 12, Appendix 6.4).

The leachate collection pipe currently discharges into the leachate storage lagoon, and the water in the leachate storage lagoon is pumped to City of Ferndale wastewater treatment plant under a state waste discharge permit<sup>5</sup>. The permit requires that wastewater be sampled for pH, total

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<sup>5</sup> Ecology Permit and Reporting Information System (PARIS) for ST0007289  
<http://ecyapwq/Paris/Reports/PermitDetailReport.aspx?PermitId=363634>

suspended solids, oil & grease, cadmium, lead, and zinc monthly and be sampled for arsenic, chromium, copper, mercury, nickel, selenium, and silver twice per five-year cycle.

Parberry Environment Solutions is evaluating alternatives for the discharge of water from the leachate collection pipe. Parberry Environment Solutions collected water samples from the leachate line 79 times between October 1, 2014 and September 2, 2021 for analysis of cadmium, copper, lead, and zinc. The maximum detected concentrations of cadmium, copper, lead, and zinc were below the industrial stormwater general permit benchmark concentrations and below the groundwater quality criteria for the State (WAC 173-200). The sampling results are summarized in Appendix 6.5. On June 2, 2020, Parberry Environment Solutions submitted the sample for an analysis of priority pollutants, including metals, asbestos, dioxins, polychlorinated biphenyls (PCBs), pesticides, volatile organic compounds, semivolatile organic compounds, cyanide, and total phenol. The laboratory sample report is provided in Appendix 6.5. The leachate pipe water sample contained metals at concentrations consistent with natural background. The leachate pipe water sample also contained two chemicals that are not consistent with natural background—16.7 micrograms per liter ( $\mu\text{g/L}$ ) cyanide and 0.8  $\mu\text{g/L}$  ethylbenzene.

Groundwater and surface water samples were submitted for analysis of cyanide in June 1990 (SAIC, 1990; Vasey, 1994). The concentrations of cyanide ranged from less than 10 to 67  $\mu\text{g/L}$  in the Site monitoring wells; the lowest concentrations of cyanide were in wells located near the leachate collection pipe on the west side of the ash landfill. The concentrations of cyanide were 158  $\mu\text{g/L}$  in the leachate pond and 102  $\mu\text{g/L}$  in surface water in the culvert southwest of the leachate pond. The surface water in the leachate pond included quench water used to cool the incinerator ash, groundwater intercepted by the leachate collection trench, leachate from the ash storage area, and runoff from the access roads and parking areas. No additional sampling of cyanide was performed. The concentrations of cyanide exceed the current MTCA surface water cleanup level of 4  $\mu\text{g/L}$  and current groundwater cleanup level of 10  $\mu\text{g/L}$ .

Ecology's Water Quality Program concluded that leachate collection pipe does not qualify for discharge under the Industrial Stormwater General Permit (ISGP)<sup>6</sup>. Pursuant to the ISGP, the leachate collection pipe discharge is a "process wastewater" because the water presumptively commingles with water that comes into contact with a waste product (i.e., the incinerator ash). Water that commingles with process water is considered process water. Process wastewater is a prohibited discharge under the ISGP. In the absence of contact with a waste product, the ISGP may allow uncontaminated groundwater to be discharged as a "conditionally authorized non-stormwater discharge." The leachate collection pipe discharge cannot be considered to be "uncontaminated groundwater" at this time based on ISGP criteria.

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<sup>6</sup> Ecology Industrial Stormwater General Permit Webpage <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Industrial-stormwater-permit>



Ecology's Water Quality Program indicated that a modified state waste discharge permit or an individual National Pollutant Discharge Elimination System (NPDES) permit<sup>7</sup> might be an option for the leachate collection pipe discharge.

## 2.7 Consent Decree

Recomp entered into Consent Decree No. 96-2-01293-5 with Ecology on July 5, 1996. The Consent Decree required Recom to dispose of incinerator ash at the Roosevelt Regional Ash Monofill landfill in Klickitat County, Washington that was constructed and permitted under WAC 173-306. The Consent Decree defined incinerator ash placed in the ash storage facility from 1989 to May 2, 1994 as "Prior Production" and incinerator ash generated thereafter as "Current Production." The Current Production incinerator ash was disposed at the Roosevelt Regional Monofill landfill. The Consent Decree required Recom to remove the Prior Production from the ash storage facility and dispose the ash at the Roosevelt Regional Monofill landfill. Recom agreed to remove the Prior Production at a sufficient rate for its removal by May 1, 2002. The Consent Decree required Recom to submit annual Interim Closure Reports and to submit a Final Closure Report for the ash storage facility. Recom was allowed to close the Facility Closure Account Trust Agreement, dated August 3, 1994, after the removal of the Prior Production no later than May 1, 2002. Following Ecology's Notice of Completion letter, Ecology and Recom filed a Joint Motion to Dismiss Consent Decree No. 96-2-01293-5 with the Whatcom County Superior Court on May 15, 2001.

## 2.8 Monitoring Requirements

Cleanup standards were not developed under MTCA for the Recom of Washington site. This section summarizes testing requirements after closure of the ash landfill in 1989.

TRC's Plan of Operations (Harper Owes, February 1990) describes the facility's groundwater and surface monitoring plan after closure of the ash landfill and during the operation of the ash storage facility. The monitoring plan was prepared in accordance with WAC 173-304 and intended to detect the potential release of contamination from the closed ash landfill and temporary ash storage facility. The monitoring plan includes quarterly sampling of three upgradient monitoring wells, seven downgradient monitoring wells, three surface water sampling locations in the drainage swale west of the landfill, and surface water in the leachate pond. The groundwater and surface water samples were analyzed for field measurements, conventional water quality parameters, and metals. The conventional water quality parameters include alkalinity, chloride, sulfate, nitrate+nitrite, ammonia, chemical oxygen demand, total organic carbon, total suspended solids, and total coliform. The metals include antimony, arsenic, beryllium, cadmium, chromium, copper, iron, lead, manganese, mercury, nickel, selenium, silver, thallium, and zinc. Groundwater was analyzed for dissolved metals, surface water for total metals, and leachate pond water from total and dissolved metals. The leachate pond samples

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<sup>7</sup> Ecology Water Quality Individual Permits Webpage <https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-quality-permits/Water-Quality-individual-permits>

were also analyzed for volatile and semi-volatile organic compounds. In accordance with WAC 173-304(2)(a) and the definition of contamination in WAC 173-304-100, groundwater contamination was defined as an exceedance of the maximum contaminant level in WAC 246-290-310 or a statistical significant increase in concentrations above background levels.

After WAC 173-306 became effective on May 31, 1990, the facility maintained an Ash Management Plan (November 1990, et alia) for the ash storage facility. The Ash Management Plan requires the development of a groundwater monitoring plan for the quarterly sampling of parameters specified in WAC 173-306-500(2)(d)(i)(A)-(L), which include:

- A. Temperature;
- B. Conductivity;
- C. pH;
- D. Chloride;
- E. Nitrate, nitrite, and ammonia as nitrogen;
- F. Sulfate;
- G. Dissolved iron, cadmium, lead, and mercury;
- H. Dissolved zinc and manganese;
- I. Chemical oxygen demand;
- J. Total organic carbon;
- K. Calcium and sodium; and
- L. Gamma radiation.

The Ash Management Plan stated that sampling of individual nitrogen compounds and gamma radiation was only planned for one year. The Ash Management Plan also included quarterly testing of lead and cadmium in ambient air samples and annual testing of lead and cadmium in soil at the property boundary, in accordance with WAC 173-306-200(4)(g) and WAC 173-306-500(5).

The 1996 Consent Decree stated that the incinerator ash was sampled quarterly in accordance with the US Environmental Protection Agency (EPA)'s "Sampling and Analysis of Municipal Refuse Incinerator Ash" draft guidance, dated May 20, 1994. EPA's (1994) draft guidance provides sampling procedures and methodologies to confirm that ash does not exhibit the toxicity characteristic for hazardous waste (D-listed hazardous waste defined in 40 Code of Federal Regulations (CFR) 261.24). The Consent Decree stated that the incinerator ash generated after May 2, 1994, (i.e., Current Production) was sampled, and that the concentrations of lead

and cadmium in the Toxicity Characteristic Leaching Procedure (TCLP) leachate were below the threshold for designation as hazardous waste. The Prior Production (i.e., ash generated between 1989 and May 2, 1994) was characterized by submitting 50 ash samples for analysis of TCLP metals. The Consent Decree stated that the “Prior Production passed TCLP at a high statistical confidence level” and concluded that the incinerator ash was not considered hazardous waste.

## 2.9 No Further Action Opinion

Because the Recomp of Washington Site was listed on Ecology’s Confirmed and Suspected Contaminated Sites List (CSCSL)<sup>8</sup>, Recomp applied to Ecology’s Voluntary Cleanup Program on April 29, 2003, and requested a No Further Action (NFA) opinion (Environmental Health Services, 2003). Ecology provided an NFA opinion and removed the site from the CSCSL. The justification for the NFA opinion included:

- Permitting authorities have always permitted the site; Whatcom County Health Department with Ecology oversight for the solid waste handling permit and Northwest Air Pollution Authority for releases to air. Therefore, this site has always had some degree of regulatory oversight.
- Although pre-to-mid-1980 investigations indicated off-property migration of contaminants, several following investigations, including an EPA investigation, indicate no releases are occurring from the Recomp property.
- The Washington Department of Health conducted a Health Risk Assessment on the facility with no significant adverse findings.
- Fourteen years of groundwater and surface water monitoring did not detect an ongoing or significant release from the facility to groundwater or surface water. Twelve years of this monitoring occurred post-closure of the ash landfill thereby providing performance monitoring for the closure controls.
- The landfill has an engineered cover and is surrounded by a controlled density slurry wall on three sides and a re-compacted clay wall on the downgradient side.
- The geology of the Site is very restrictive to groundwater movement.
- The landfill has a constructed, engineered, passive leachate collection system that assures no leachate buildup will occur within the landfill.

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<sup>8</sup>See "What does it mean to be on Ecology's List of Contaminated Sites"  
[https://ofm.wa.gov/sites/default/files/public/legacy/resources/yearend/What\\_does\\_it\\_mean\\_to\\_be\\_on\\_Ecologys\\_list.pdf](https://ofm.wa.gov/sites/default/files/public/legacy/resources/yearend/What_does_it_mean_to_be_on_Ecologys_list.pdf)

- Collected leachate is discharged to a publicly owned treatment works (POTW) (wastewater treatment plant) under a discharge permit that requires monthly testing of the discharge. Discharge results are well below permit limitations.
- The City of Ferndale POTW that receives the wastewater required Recom to remove all sludge impacted by the facility operations. This removal is completed.
- All temporarily stored ash is removed from the Site and disposed in accordance with an ash handling plan and permit.
- The waste materials in the landfill were characterized by EPA and Ecology and found to be suitable to remain onsite.
- No additional landfilling occurred following closure of the ash landfill in 1989.
- A hydrogeological investigation was conducted on the Site with oversight and approval from the Whatcom County Health Department and Ecology.
- The three water-bearing zones found through hydrogeological investigation have very low production rates making them unsuitable for use.
- There is no known groundwater use downgradient of the Site, between the Site and the Nooksack River.
- The facility is located within the City of Ferndale in a manufacturing zone. A significant amount of new development has occurred around the Site and the Site itself has long-term committed uses within the complex. Therefore, the Site will not be converted to residential use nor will it be abandoned.
- A solid waste transfer station with a long-term commitment resides on the property. This operation will require continued permitting and inspection by the Health Department; therefore, long-term oversight is assured.
- The Facility is fenced.
- A public participation grant was awarded to a concerned citizen group to investigate the facility and findings of State and Federal investigations have had substantial publicity thereby assuring public participation and involvement.

Ecology issued a NFA opinion on January 5, 2005 based on the review of:

- 1988 Preliminary Hydrogeological Investigation (Golder Associates, 1988).
- 1989 Engineering Report for Landfill Closure and Temporary Ash Storage Facility Construction.

- 1989 Geotechnical Design Report for Proposed Temporary Ash Storage Facility.
- Quarterly groundwater monitoring from September 1993 to September 2001.

Ecology concluded that the release of lead and cadmium into soil no longer poses a threat to human health or the environment. Ecology's NFA was granted for only the release identified in the April 29, 2003 letter. Although Ecology granted the NFA under MTCA, the

- Ash was disposed in a landfill permitted under WAC 173-301 and WAC 173-304.
- Site investigations were performed for the landfill permit under WAC 173-304.
- Landfill was closed under WAC 173-304 without post-closure care and financial assurance requirements.
- Groundwater and surface water monitoring was performed in accordance with Plan of Operation (Harper Owes, 1990) that satisfied WAC 173-304 during operation of the ash storage facility.

Under the MTCA framework, Ecology considered the release to be the landfilled ash material that contains lead and cadmium and the Remedial Action to be the landfill closure. These reports do not reference a release of contamination from the landfill. Ecology's NFA is subject to maintaining a restrictive covenant for the property.

## **2.10 Restrictive Covenant**

Ecology determined that the Site was eligible for a 'No Further Action' determination if a Restrictive Covenant was recorded for the property. A Restrictive Covenant (provided in Appendix 6.6) was recorded for the Site on October 1, 2004 which imposed the following limitations:

Section 1. Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil that was contained as part of the Remedial Action, or create a new exposure pathway is prohibited. Some examples of activities that are prohibited in the capped areas include: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork.

Section 2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4. Any unpermitted activity on the property that may result in the release of contaminants remaining on the Property as part of the Remedial Action that may expose the City of Ferndale water sewer or storm water systems to contamination is prohibited without prior written approval from Ecology.

Section 5. The Owner of the Property must give thirty (30) days advance written notice to Ecology of the Owner's intent to convey interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 6. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.

Section 7. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 8. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times, and upon reasonable notice unless an emergency prevents such notice, for the purposes of evaluating the Remedial Action, to take samples, to inspect remedial actions conducted at the property, and to inspect records that are related to the Remedial Action.

Section 9. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

## **2.11 Site Inspection**

Ecology and Whatcom County Health Department performed a site visit on January 22, 2021 to review the current status of the facility. Appendix 6.7 provides the Site Inspection Checklist and Appendix 6.8 provides photographs from the site visit.

## 3.0 PERIODIC REVIEW

### 3.1 Effectiveness of Completed Cleanup Actions

In the NFA letter, Ecology considered the completed closure of the ash landfill to be the MTCA cleanup action. Whatcom County Health Department approved the closure the ash landfill under WAC 173-304 by November 27, 1989, such that no post-closure care or financial assurance requirements were required under the solid waste regulations. Recom performed perimeter soil and air monitoring and surface and groundwater monitoring during the operation of the overlying ash storage facility from 1989 through 2001. There is no documented release of contamination from the closed ash landfill or the former ash storage facility.

The gravel interceptor trench and leachate collection pipe was installed along the west side of the ash landfill in 1989 as a part of the landfill closure (Harper Owes, 1989). The 1990 Plan of Operations (Harper Owes, 1989) included the continued operation of the leachate collection pipe and the pump station for the leachate storage lagoon, which would intercept leachate from the closed ash landfill and discharge the leachate to the City of Ferndale wastewater treatment plant.

The long-term need for the leachate collection pipe was mitigated by the construction of the soil-bentonite slurry wall, which was proposed in February 1990 (Golder, 1990). The proposed soil-bentonite slurry wall extends along the north and east sides of current Parcel 173981, extends west through current Parcel 173983 south of the former incinerator and waste receiving building, and then extends northwest along the west property boundary of current Parcel 99458 to the south extent of the closed ash landfill. The slurry wall was constructed through the Sumas Outwash Sand formation, keyed about three feet into the underlying Bellingham Drift formation, and appears to tie-into the compacted clay berms on the northeast and southwest sides of the closed ash landfill. The slurry wall was designed with a sufficiently low permeability to prevent groundwater from laterally migrating toward the closed ash landfill. The closed ash landfill was constructed with a two-foot compacted clay cover. The surface between the closed ash landfill and the slurry wall is completed with paved and gravel surfaces, which were observed during the January 22, 2021, site visit. The clay cap of the landfill extends beyond the landfill to the asphalt-paved surface that extends to the slurry wall. The maintenance of the low-permeability landfill cover, the soil-bentonite slurry wall, and the paved surfaces at the facility limit the recharge of water into the closed ash landfill. The leachate collection pipe may only receive shallow groundwater from the drainage swale between the closed ash landfill and the railroad tracks, which is partially recharged by groundwater that is diverted around the slurry wall.

A water sample was collected from the leachate collection pipe on June 2, 2020, and submitted for the analysis of priority pollutants. The water sample contained naturally occurring metals that may be indicative of background conditions. Arsenic was detected at 5.2 µg/L, which exceeds target cleanup levels of 5.0 µg/L for groundwater and surface water, but which is generally consistent regional background concentrations. The concentrations of the other metal species were below applicable MTCA screening levels. The water sample contained 16.7 µg/L cyanide, which exceeds the 10 µg/L MTCA Method B groundwater cleanup level, the 5.2 µg/L surface water screening level protective of aquatic life, and the 4.0 µg/L surface water screening level

protective of human health. Cyanide is not listed as a potential hazardous substance for ash landfills, and its origin is unknown. The water sample also contained 0.8 µg/L of ethylbenzene, which is orders-of-magnitude below the applicable screening levels.

The Restrictive Covenant for the Site was recorded and is in place. This Restrictive Covenant prohibits activities that would disturb the landfill cover and that may result in the release of hazardous substances into the environment.

### **3.2 New Scientific Information for Individual Hazardous Substances or Mixtures Present at the Site**

There is no new scientific information for the contaminants related to the Site.

### **3.3 New Applicable State and Federal Laws for Hazardous Substances Present at the Site**

The cleanup at the Site was governed by landfill closure standards in WAC 173-304. The hazardous substances within the closed ash landfill and former ash storage facility were evaluated by federal hazardous waste standards, WAC 173-304 standards (non-hazardous solid waste landfills after enactment of RCRA), and WAC 173-306 standards (special incinerator ash landfills). The cleanup action is still protective of human health and the environment.

### **3.4 Current and Projected Site and Resource Use**

The Site is currently used for commercial and industrial purposes. There have been no changes in current or projected future Site or resource uses.

### **3.5 Availability and Practicability of More Permanent Remedies**

The ash landfill was authorized under WAC 173-301 and closed under WAC 173-304, which were the applicable solid waste regulations at the time. In the NFA letter, Ecology considered the landfill closure to be the MTCA cleanup action. The landfill containment remedies appear to be working; however, there is no groundwater monitoring requirements for the facility. The relocation of the closed ash landfill is not under consideration.

### **3.6 Availability of Improved Analytical Techniques to Evaluate Compliance with Cleanup Levels**

The analytical methods used during the operation of the ash storage facility were capable of detection below applicable screening levels. The current monitoring requirements are limited to surface water discharges. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.



## 4.0 CONCLUSIONS

The following conclusions have been made as a result of this periodic review:

- The cleanup action (i.e., landfill closure) completed at the Site appears to be protective of human health and the environment.
- The landfill containment system includes native low-permeability soils beneath the landfill, a compacted clay cover above the landfill material, and a gravel cutoff trench and leachate collection pipe downgradient of the landfill. Additionally, the soil-bentonite slurry wall and paved surfaces between the landfill cover and the slurry wall divert groundwater and surface water away from the closed ash landfill.
- The Restrictive Covenant for the property continues to be effective in protecting human health and the environment from exposure to hazardous substances and protecting the integrity of the cleanup action.
- This periodic review distinguishes the Recomp of Washington site and the adjoining Wilder Landfill site, but the periodic review does not evaluate the Wilder Landfill site.

Based on this periodic review, the Department of Ecology has determined that the requirements of the Restrictive Covenant continue to be met. No additional cleanup actions are required at the Site by the property owner. The property owner is responsible for inspecting the Site to assure that the integrity of the remedy is maintained.

### 4.1 Next Review

The next review for the Site will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years from the completion of those activities.

## 5.0 REFERENCES

Ecology, 1996, Consent Decree No. 96-2-01293-5 between the Washington Department of Ecology and Recomp of Washington, Inc., Signed July 1, 1996, entered into Whatcom County Superior Court on July 5, 1996.

Environmental Health Services (EHS), 2003, Letter to Ecology RE Completion of Voluntary Cleanup of Recomp of Washington, 1524 Slater Road, Ferndale, Washington 98227, Whatcom County, April 29, 2003.

Environmental Protection Agency, 1994, Sampling and Analysis of Municipal Refuse Incinerator Ash, Draft, EPA-530-R-94-020, May 1994.

Environmental Protection Agency, 2003, No Further Action letter for hazardous waste pit under Federal Superfund Program, April 25, 2003.

Golder Associates, 1988, Technical Memorandum to Thermal Reduction Company Preliminary Hydrological Investigation, Bellingham, Washington, June 1988.

Golder Associates, 1990, Geotechnical Design Report, Proposed Soil Bentonite Slurry Wall, Thermal Reduction Company, Bellingham, Washington, February 20, 1990.

Harper Owes, 1989, Engineering Report, Landfill Closure and Temporary Ash Storage Facility Construction, Thermal Reduction Company, June 28, 1989.

Harper Owes, 1990, Plan of Operation, Waste Reduction Facility, Thermal Reduction Company, February 1990.

Recomp of Washington, 1990 et alia, Ash Management Plan, Recomp of Washington, Inc., 1524 Slater Road, November 1990, revised April 1991, March 1992, et alia.

Recomp of Washington, 1996, Annual Report for the Year 1995, Recomp of Washington, Inc., Slater Road, Ferndale, Washington, March 1996.

Restrictive Covenant, October 1, 2004.

Science Applications International Corporation (SAIC), 1990, Field Sampling and Laboratory Analysis Report for Oversight of Ground Water and Surface Water Sampling at Thermal Reduction Company, Inc., Ferndale, Washington, November 1990.

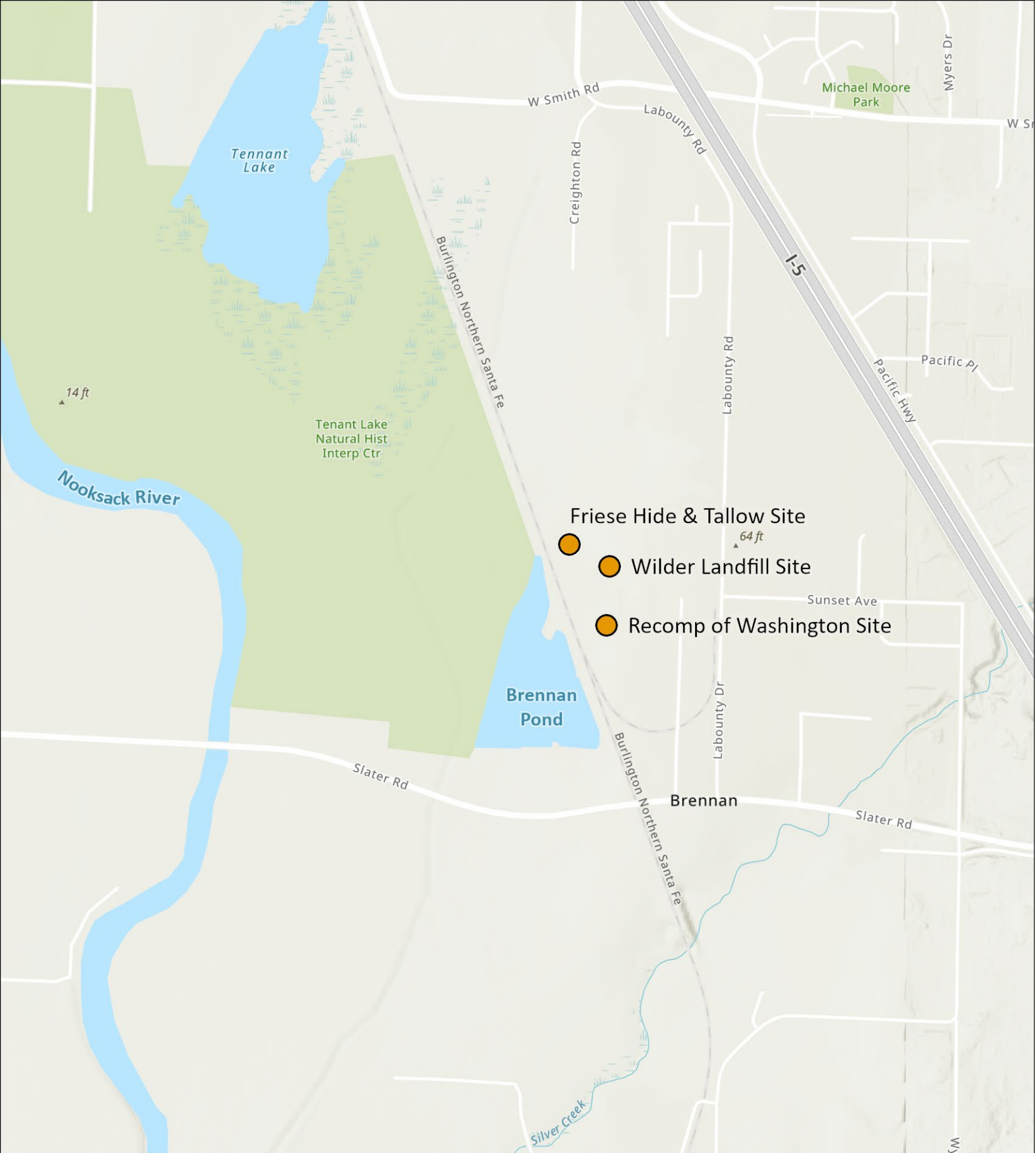
Vasey Engineering, 1994, Water Quality at Recomp Ash Monofill, Recomp of Washington, 1524 Slater Road, Ferndale, Washington, April 7, 1994.

Weston Solutions, 2003, Wilder Landfill-Hazardous Waste Pit Preliminary Assessment/Site Inspection Report, EPA Contract 68-S0-01-02, TDD 01-09-0001, March 21, 2003.

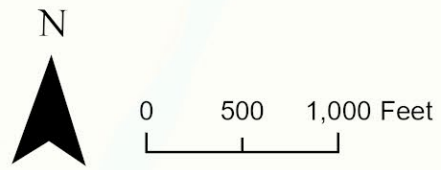
Wilder Construction Company, 1974, Environmental Impact Statement, Proposed 100-Ton Per Day Solid Waste Incinerator and Disposal Site, State Highway 540 near Ferndale Washington, Northwest Pollution Authority, May 15, 1974.

## 6.0 APPENDICES

## **6.1 Vicinity and Parcel Maps**



**Figure 1: Vicinity Map**



 Site Locations

Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, Whatcom County, WA State Parks GIS, Esri Canada, Esri, HERE, Garmin, SafeGraph, INCREMENT P,



**Figure 2: Parcel Map**

**Parcel Boundaries**

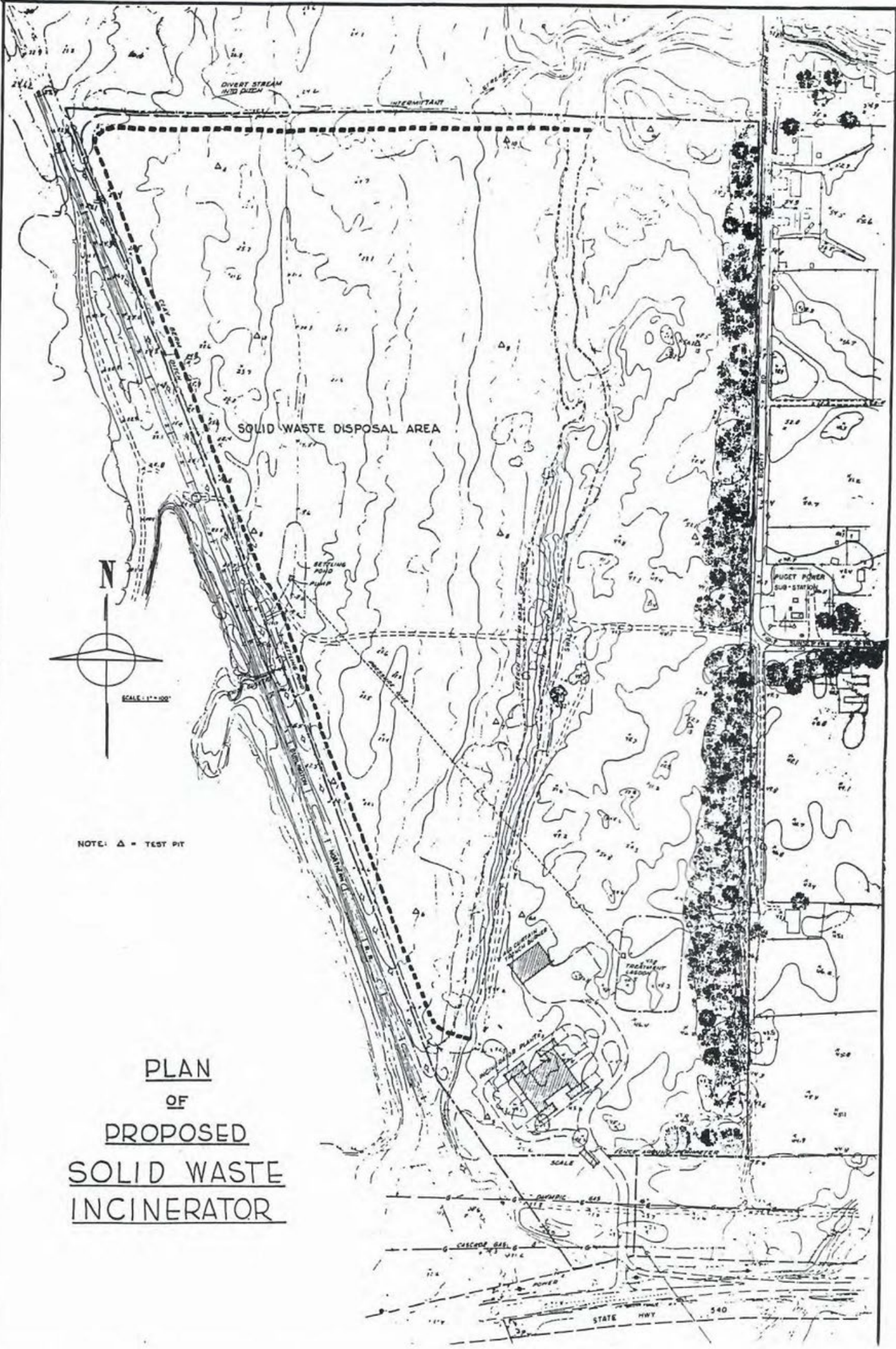
- Recomp of Washington Site
- Wilder Landfill Site
- Friese Hide & Tallow Site
- Railroad Easement
- Approximate source location at Site

0 250 500 Feet



## **6.2 Topographic Map Prior to Landfilling (Wilder, 1974)**





SOLID WASTE DISPOSAL AREA



NOTE: Δ = TEST PIT

PLAN  
 OF  
PROPOSED  
SOLID WASTE  
INCINERATOR

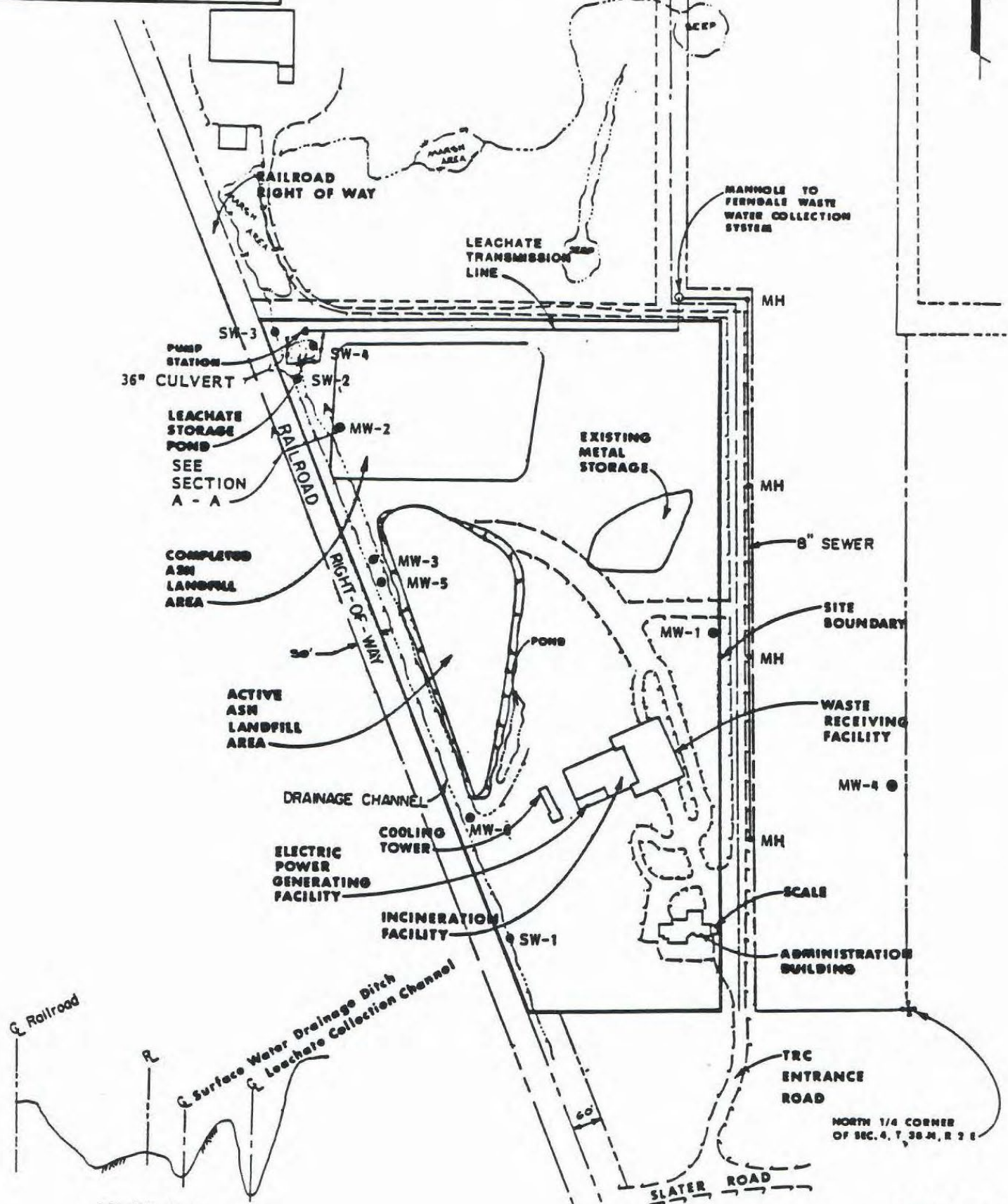
STATE HWY 540

### **6.3 Facility Figures (Harper Owes, 1989)**

**LEGEND**

- EXISTING PAVEMENT
- MW ● MONITORING WELLS
- MH ● MANHOLE
- DRAINAGE COURSE
- SW ● SURFACE WATER MONITORING LOCATION

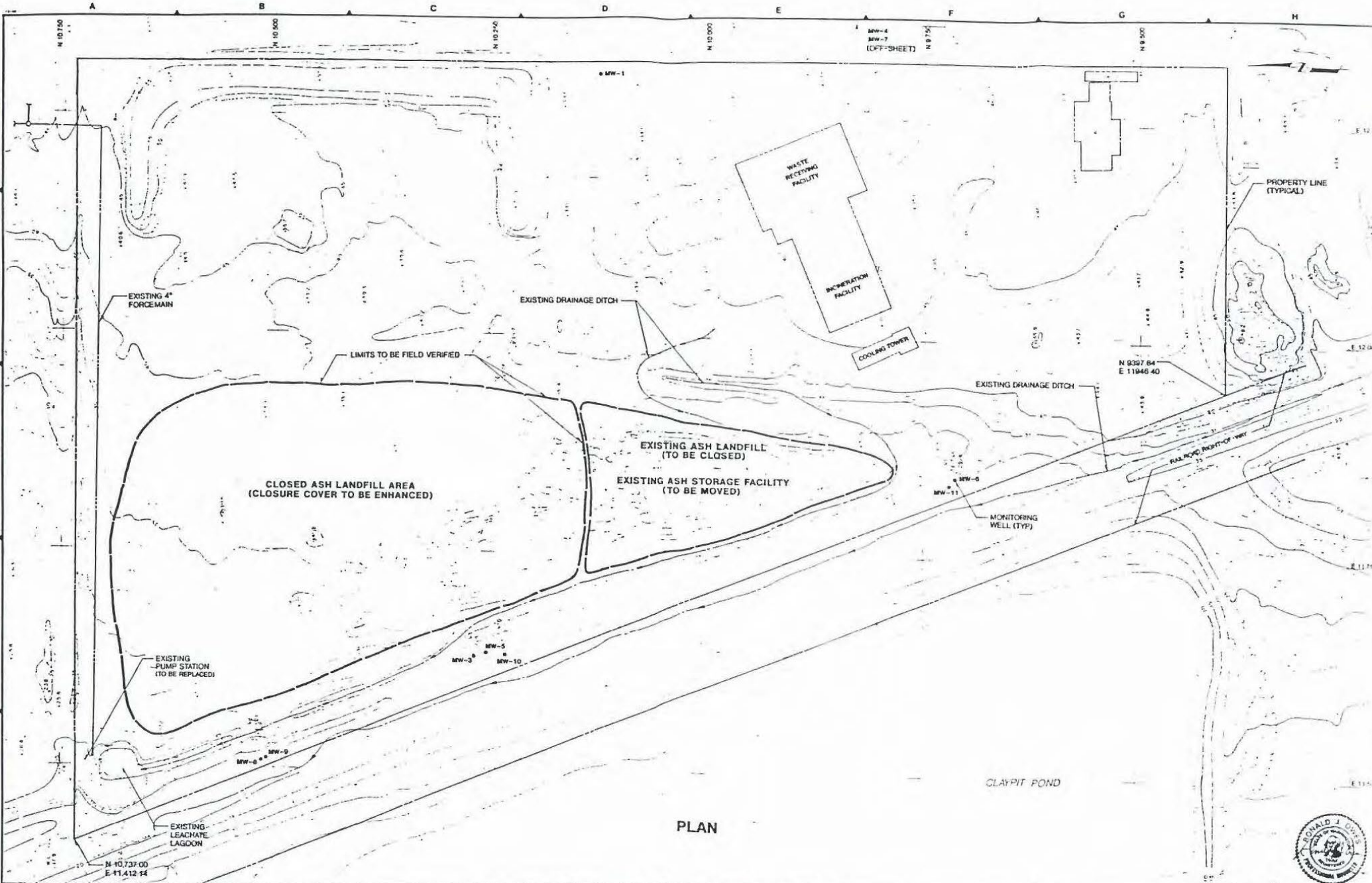
SCALE IN FEET



**SECTION A-A**  
 1" = 20' HORIZ.  
 1" = 5' VERT.

NORTH 1/4 CORNER  
 OF SEC. 4, T. 38 N., R. 2 E

**FIGURE 2  
 SITE MAP**



PLAN



NO.	REVISION	BY	DATE

**harper owes**  
CONSULTING ENGINEERS

DESIGNED SO  
DRAWN SO  
CHECKED \_\_\_\_\_

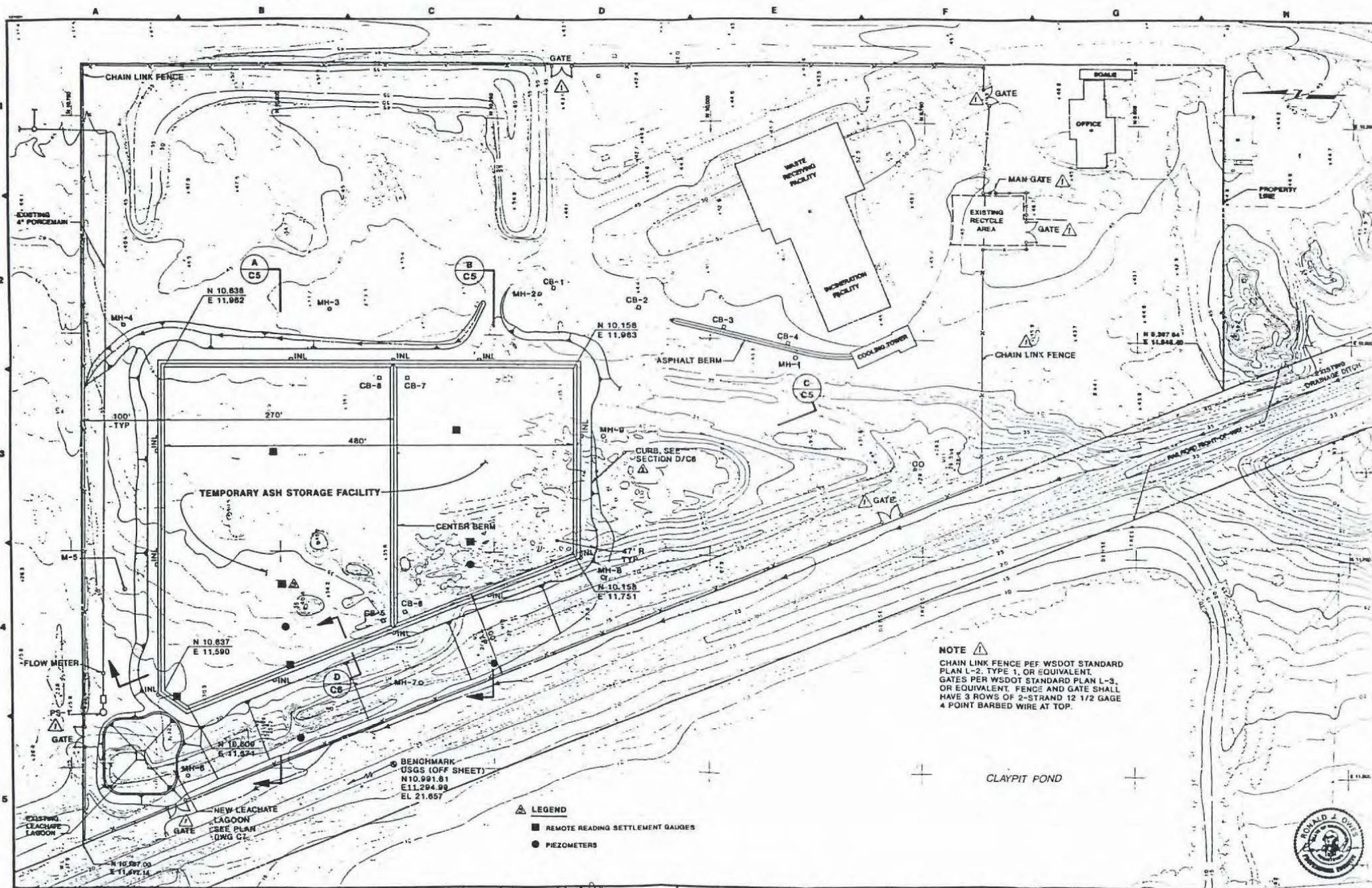
SUBMITTED RJO  
APPROVED \_\_\_\_\_  
CHECKED \_\_\_\_\_

DATES 28-1-83  
DATE \_\_\_\_\_  
DATE JUNE 28, 1988  
DATE \_\_\_\_\_

SCALE 1"=50'-0"  
ONE INCH AT FULL SIZE  
SCALE ACCORDINGLY

Thermal Reduction Co., Inc.  
TEMPORARY ASH STORAGE FACILITY

EXISTING SITE PLAN  
DRAWING **G2**  
SHEET 2 OF 2



**NOTE** CHAIN LINK FENCE PER WSDOT STANDARD PLAN L-2, TYPE 1, OR EQUIVALENT. GATES PER WSDOT STANDARD PLAN L-3, OR EQUIVALENT. FENCE AND GATE SHALL HAVE 3 ROWS OF 2-STRAND 12 1/2 GAGE 4 POINT BARBED WIRE AT TOP.

**LEGEND**  
 REMOTE READING SETTLEMENT GAUGES  
 PIEZOMETERS

REMOTE READING SETTLEMENT GAUGES, PIEZOMETERS ALSO	PS	06-21-09
CURB ADDED	PS	06-21-09
FENCE, GATES, ADDED	SD	06-05-09

**haper owes**  
 CONSULTING ENGINEERS

DESIGNED <i>AD</i>	SUBMITTED <i>[Signature]</i>	DATE _____
DRAWN <i>PS</i>	APPROVED _____	DATE _____
CHECKED _____	APPROVED _____	DATE _____

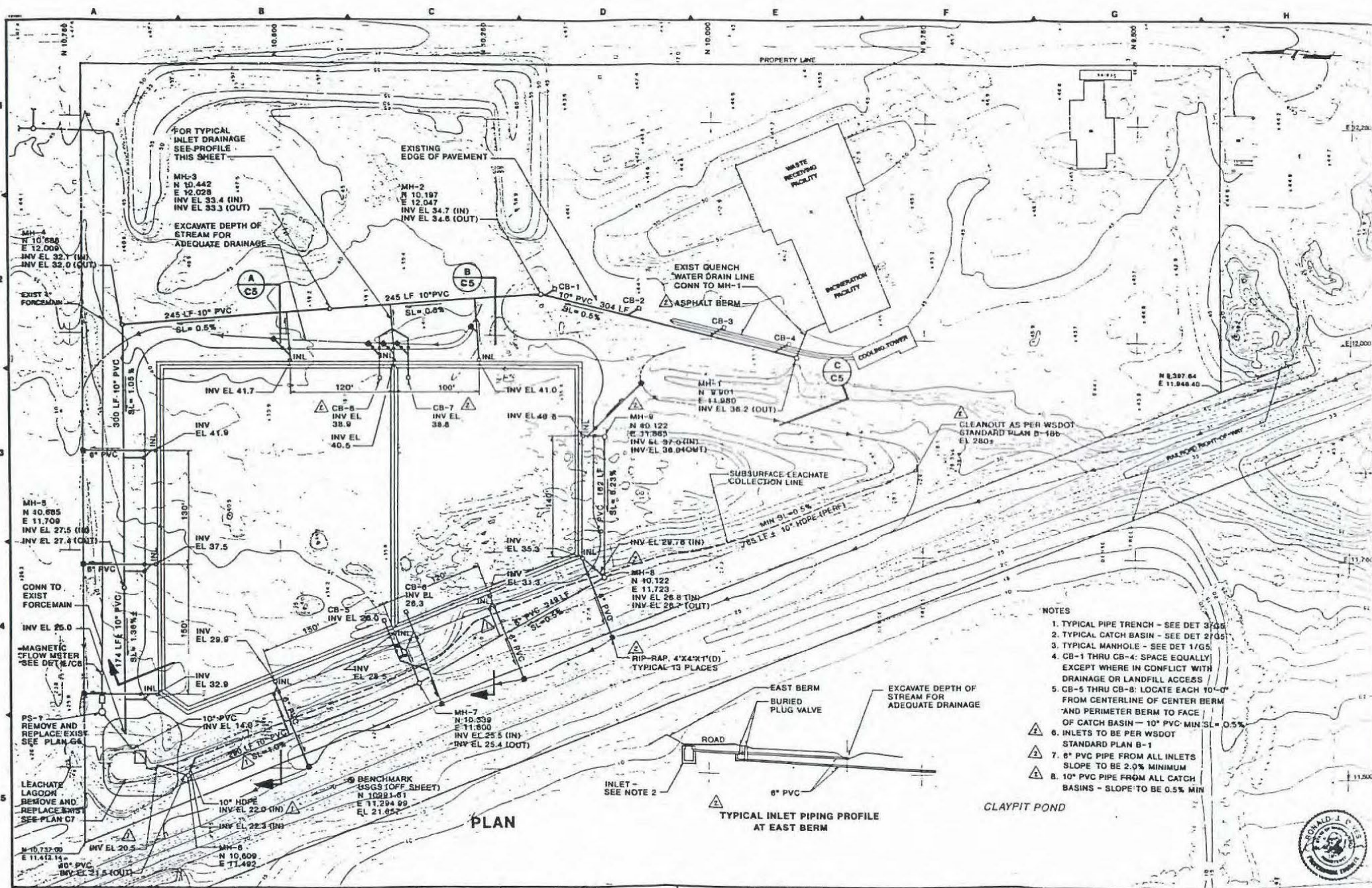
SCALE 1"=50'-0"  
 ONE INCH AT FULL SIZE  
 IF NOT ONE INCH SCALE ACCORDINGLY  
 DATE JUNE 28, 2009  
 JOB NO. TR1A 1055

THERMAL REDUCTION CO., INC.  
 TEMPORARY ASH STORAGE FACILITY

TEMPORARY ASH STORAGE FACILITY  
 NEW SITE PLAN



REVISIONS  
 SHEET 3 OF 12



- NOTES**
1. TYPICAL PIPE TRENCH - SEE DET 3/05
  2. TYPICAL CATCH BASIN - SEE DET 2/05
  3. TYPICAL MANHOLE - SEE DET 1/05
  4. CB-1 THRU CB-4: SPACE EQUALLY EXCEPT WHERE IN CONFLICT WITH DRAINAGE OR LANDFILL ACCESS
  5. CB-5 THRU CB-8: LOCATE EACH 10'-0" FROM CENTERLINE OF CENTER BERM AND PERIMETER BERM TO FACE OF CATCH BASIN - 10" PVC MIN SL= 0.5%
  6. INLETS TO BE PER WSDOT STANDARD PLAN B-1
  7. 8" PVC PIPE FROM ALL INLETS SLOPE TO BE 2.0% MINIMUM
  8. 10" PVC PIPE FROM ALL CATCH BASINS - SLOPE TO BE 0.5% MIN

**PLAN**

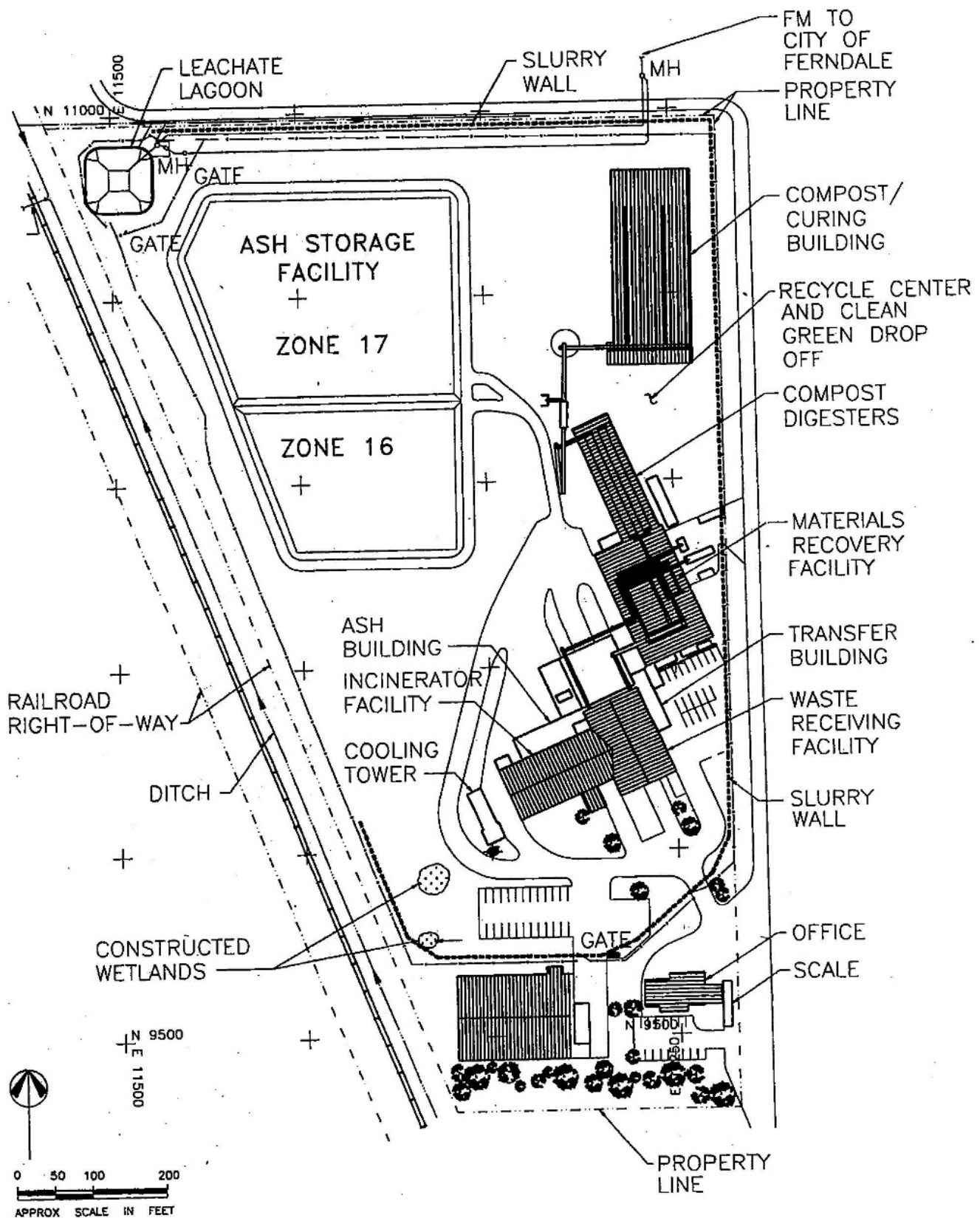
**TYPICAL INLET PIPING PROFILE AT EAST BERM**

PIPING WORKS, INC. ALL RIGHTS RESERVED. PIPING DIVISION 1100 PIPING LANE WILSON, NC 27157	DATE: 06-27-09 BY: [Signature] CHECKED: [Signature]	DRAWN: [Signature] CHECKED: [Signature]	SUBMITTED: [Signature] APPROVED: [Signature]	DATE: 06-23-09 DATE: 06-23-09 JOB NO: TRLA 1008	SCALE: 1"=50'-0" ONE INCH AT FULL SIZE IF NOT ONE INCH SCALE ACCORDINGLY	THERMAL REDUCTION CO., INC. TEMPORARY ASH STORAGE FACILITY	TEMPORARY ASH STORAGE FACILITY PIPING PLAN	DRAWING NO: G4 SHEET 4 OF 11
	HARPER OWENS CONSULTING ENGINEERS	REVISION: [Table with 2 columns: NO, DATE]	[Empty]	[Empty]	[Empty]	[Empty]	[Empty]	[Empty]



## **6.4 Facility Cross-Section (West to East) (Recomp, 1996)**

1:200 RECOMP\08-8.DWG - TILEMODE 07/15/96



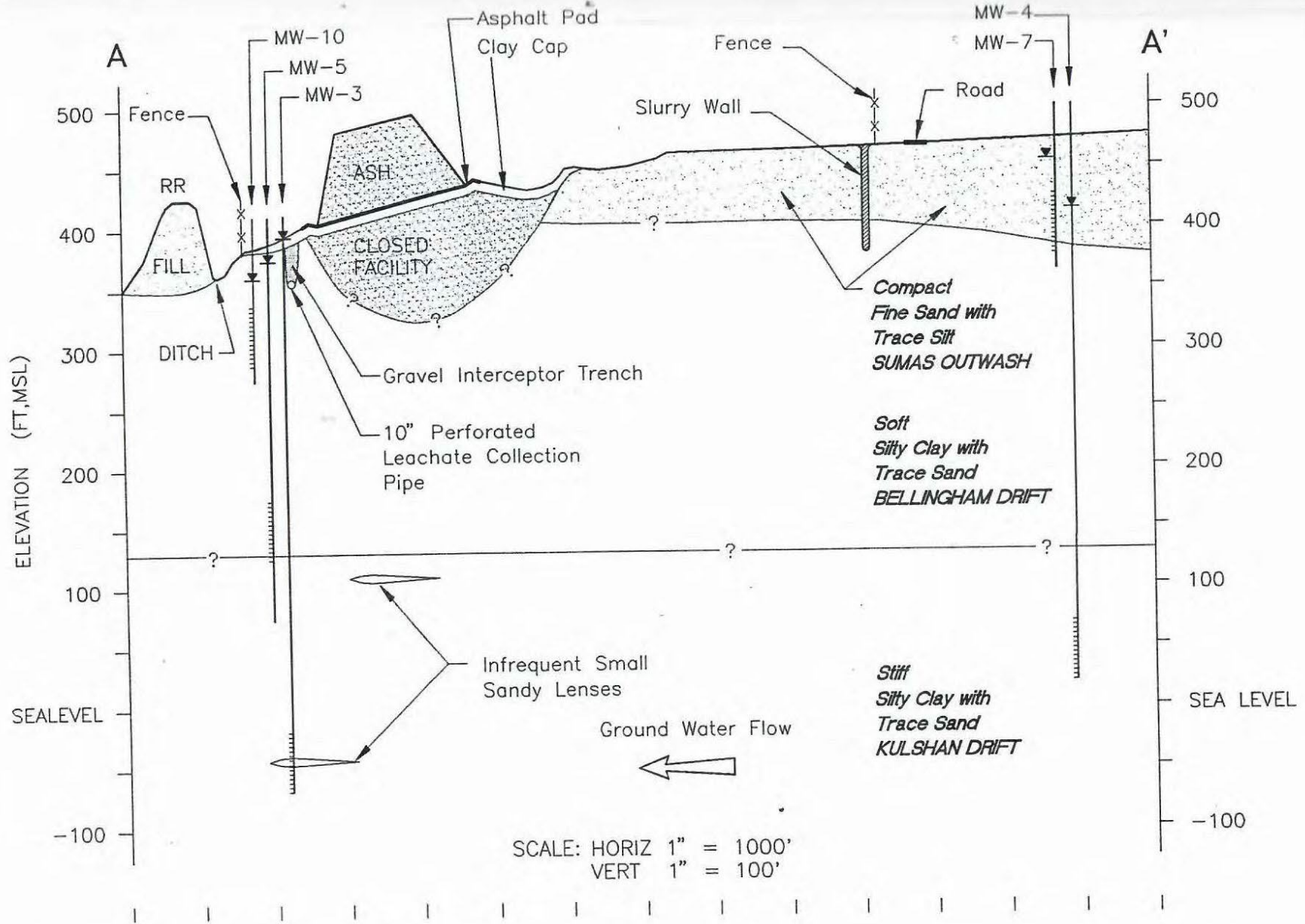
**SITE MAP**  
 Recomp of Washington  
 Ferndale, Washington

Figure





1:1000 W931401\CROSSEC.DWG 03/16/94 B.5X11



FACILITY CROSS SECTION  
Recomp of Washington  
Ferndale, Washington

Figure

12



## **6.5 Leachate Collection Pipe Water Sample Results**

ADAK IA  
Ground and Surface Water Interceptor / Historic Leachate Line

Sample Date	Cadium (ug/L)		Copper (ug/L)		Lead (ug/L)		Zinc (ug/L)	Notes
10/1/2014	ND		3.0		2.3		10.0	
10/30/2014	ND		5.0		2.0		21.0	
1/14/2015	ND		2.0		1.0		5.0	
3/10/2015	ND		2.0		1.0		5.0	
4/9/2015	ND		1.6		1.0		4.3	
5/7/2015	ND		2.2		1.2		6.0	
7/8/2015	ND		6.0		2.0		8.0	
8/14/2015	ND		3.0		2.0		9.0	
9/10/2015	ND		3.6		2.0		10.0	
10/7/2015	ND		9.7		2.2		38.0	
11/10/2015	ND		3.0		2.6		9.0	
12/10/2015	ND		4.0		1.0		17.0	
3/3/2016	ND		4.0		1.0		21.0	
4/7/2016	0.03	J	2.4		1.0		7.5	
5/13/2016	ND		6.3		1.1		14.0	
6/15/2016	0.06	J	2.2		1.5		7.4	
7/14/2016	0.06	J	3.0		2.0		9.0	
8/9/2016	0.09	J	5.0		2.0		9.0	
9/9/2016	ND		3.0		2.0		19.0	
10/11/2016	ND		4.0		2.0		10.0	
11/15/2016	ND		5.0		1.0		29.0	
12/5/2016	0.09	J	3.0		1.0		15.0	
1/10/2017	ND		2.0		0.9		6.0	
2/17/2017	0.3		12.0		6.0		65.0	Lagoon backed up into leachate line few days prior to sample
3/6/2017	0.05	j	4.0		0.8		10.0	
4/6/2017	0.04	j	3.0		0.8		10.0	
5/3/2017	0.03	j	6.0		1.0		40.0	
6/7/2017	ND		2.0		1.0		5.0	
7/12/2017	0.07	J	6.0		2.0		9.0	
8/8/2017	0.2	J	11.0		2.0		40.0	
9/15/2017	0.05	J	3.0		2.0		7.0	
10/12/2017	0.04		3.0		2.0		10.0	
11/8/2017	0.3		3.0		2.0		17.0	
12/8/2017	ND		2.0		1.1		6.0	
1/10/2018	ND		1.6	J	0.9		9.3	
2/8/2018	ND		2.1		0.8		9.7	
3/8/2015	0.022	J	2.3		1.0		12.0	
4/4/2018	ND		1.4	J	0.9		4.4	Reported Cr @ 36Ug/L MTCA 50 or 100

ADAK IA  
Ground and Surface Water Interceptor / Historic Leachate Line

Sample Date	Cadimum (ug/L)		Copper (ug/L)		Lead (ug/L)		Zinc (ug/L)		Notes
5/8/2018	0.04	J	2.3		1.1		5.6		
6/12/2018	0.03	J	2.7		1.3		5.1		
7/6/2018	ND		2.2		2.0		7.0		
8/7/2018	0.05	J	4.0		2.0		8.0		
9/7/2018	0.007		4.0		2.5		10.0		
10/9/2018	0.04	J	3.8		1.9		11.0		
11/7/2018	0.03	J	3.2		1.9		9.3		Pumping to wet well
12/13/2018	0.2	J	9.9		3.1		46.0		Lagoon backed up into leachate line days prior to sample
1/9/2019	0.05	J	6.2		0.9		17.0		
2/6/2019	0.08	j	3.4		1.0		6.3		
3/13/2019	0.04	J	1.9	J	1.0		6.1		
4/5/2019	0.06		1.9		1.1		5.9		
5/7/2019	0.06	J	1.9	J	1.1		0.6		
6/7/2019	0.08	J	3.2		1.3		12.0		
7/10/2019	0.05	J	2.9		1.6		7.0		
8/13/2019	0.03	J	2.6		1.8		8.5		
9/11/2019	ND		2.5		1.6		11.0		
10/16/2019	0.06	J	3.0		1.7		10.2		Lagoon backed up into leachate line 9 days prior to sample
11/19/2019	ND		3.9		1.5		22.5		new pump 11/9
12/11/2019	0.07	J	2.5		1.5		8.2		
1/8/2020	0.17	J	3.1		1.0		34.4		1.75" rain, bypassing pump
2/1/2020									Not tested Sheen backup into leachate line
3/18/2020	0.02	J	1.4		0.9	J	4.0		
5/13/2020	0.04	J	5.6		1.2		15.3		
6/2/2020	0.02	J	1.5	J	1.2		11.8		With Priority Pollutant scan
7/15/2020	0.03	J	2.1		1.4		6.9		
8/7/2020	0.02		2.3		1.4		5.9		
9/9/2020	0.02	J	2.2		1.8		5.6		
10/13/2020									No sample, unsafe weather conditions
11/13/2020	ND		3.6		1.2		75.4		
12/10/2020	0.07	J	3.2		0.9		11.0		
1/19/2021	0.059	J	2.1		0.8		7.5		
2/18/2021	ND		7.7		2.3		47.4		Lagoon backup into interceptor line 2/1/21
3/16/2021	ND		2.0		0.9		3.9		
4/14/2021	ND		1.9	J	0.9	J	4.6		
5/13/2021	ND		1.9	J	1.0		5.1		
6/15/2021	ND		1.8	J	1.1		6.5		
7/8/2021	ND		2.1		1.5		7.5		

ADAK IA  
Ground and Surface Water Interceptor / Historic Leachate Line

Sample Date	Cadimum (ug/L)	Copper (ug/L)	Lead (ug/L)	Zinc (ug/L)	Notes
8/4/2021	ND	3.8	1.6	7.3	
9/2/2021	ND	2.4	1.8	5.7	
AVE	0.0697	3.50	1.51	13.5	
Min	ND	1.6	1.0	4.3	
Max	0.3	12.0	6	75.4	
ISWGP Benchmark	2.1	14.0	64.6	117	
WAC 173-201A					
Fresh H2O	acute/chronic	acute/chronic	acute/chronic	acute/chronic	
Q-1 2001	4.92/1.25	21.79/14.20	85.8/3.34	143/131	
Q-2 2001	11.55/2.24	45.80/27.86	196.4/7.73	279/255	
Q-3 2001	14.41/2.60	55.55/33.19	245.5/9.57	332/303	
WAC 246-290 MCL or ** Action Level Drinking H2O	5	1300**	15**	5000	
WAC 173-200	10	1000	50	5000	
Regional Surface Water SW 4 from North					
6/7/1990	0	10	3	15	
12/11/1991	2	11	3	17	
6/16/1992	5	10	2	12	
9/19/1992	2	7	2	52	
12/16/1992	2	4	3	9	
AVE	2	8	3	21	





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July 23, 2020

Page 1 of 1

Dave B.  
Parberry Environmental Solutions, Inc.  
P O Box 669  
Ferndale, WA 98248  
RE: 20-17415 - Groundwater Testing

Dear Dave B.,

Your project: Groundwater Testing, was received on Tuesday June 02, 2020.

All samples were analyzed within the accepted holding times and were appropriately preserved and analyzed according to approved analytical protocols, unless noted in the data or QC reports. The quality control data was within laboratory acceptance limits, unless specified in the data or QC reports.

If you have questions phone us at 800 755-9295.

Respectfully

A handwritten signature in blue ink, appearing to read "Hiro Yamamoto". The signature is fluid and cursive, with a long horizontal stroke at the end.

Hiro Yamamoto  
Chief Organic Chemist

Enclosures: Data Report



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# Revised - 8-3-2020

## Data Report

Client Name: Parberry Environmental Solutions, Inc.  
P O Box 669  
Ferndale, WA 98248

Reference Number: **20-17415**  
Project: Groundwater Testing

Report Date: 7/23/20

Date Received: 6/2/20  
Approved by: ajw,bj,mle  
Authorized by:

Hiro Yamamoto  
Chief Organic Chemist

Sample Description: Leachate Line LL Sump= Leachate Line Sump								Matrix WW	Sample Date: 6/2/20 8:30 am			
Lab Number: 33337		Sample Comment:						Collected By: Dave Bader				
CAS ID#	Parameter	Result	PQL	MDL	Units	DF	Method	Lab	Analyzed	Analyst	Batch	Comment
1332-21-4	ASBESTOS	ND	2.782	0.931	MFL>10um	1.0	100.2	a	6/8/20	SH	LABCOR_200608	
7439-97-6	MERCURY - Clean	0.00102	0.0005	0.0002	ug/L	1.0	1631		6/8/20	TEC	ANA1631_200608	Analyzed By Anatek
7440-36-0	ANTIMONY	1.9	1.0	0.00691	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
7440-38-2	ARSENIC	5.2	0.5	0.02177	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
7440-41-7	BERYLLIUM	0.01 J	0.5	0.00676	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
7440-43-9	CADMIUM	0.02 J	0.25	0.01127	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
7440-47-3	CHROMIUM	31.2	1.0	0.02026	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
7440-50-8	COPPER	1.5 J	2	0.02764	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
7439-92-1	LEAD	1.2	0.5	0.00666	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
7440-02-0	NICKEL	2.0	0.5	0.01618	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
7782-49-2	SELENIUM	4.4	1	0.0266	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
7440-22-4	SILVER	0.1 J	0.2	0.01175	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
7440-28-0	THALLIUM	0.10 J	0.36	0.00706	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
7440-66-6	ZINC	11.8	2.5	0.55193	ug/L	1.0	200.8/3010A	a	6/3/20	BJ	200.8_200603A2	
18540-29-9	HEXAVALENT CHROMIUM	0.020 J	0.030	0.0049	ug/L	1.0	218.6	a	6/2/20	LJH	218.6_200602	
E-10253	PHENOLICS	ND	0.02		mg/L	1.0	420.4		6/15/20	AY	AMT420_200612	Analyzed by AmTest

Sample Description: Leachate Line Field Blank								Matrix WW	Sample Date: 6/2/20 8:30 am			
Lab Number: 33338		Sample Comment:						Collected By: Dave Bader				
CAS ID#	Parameter	Result	PQL	MDL	Units	DF	Method	Lab	Analyzed	Analyst	Batch	Comment
7439-97-6	MERCURY - clean	ND	0.5	0.2	ng/L	1.0	1631		6/8/20	TEC	ANA1631_200608	Analyzed by Anatek

Notes:

ND = Not detected above the listed practical quantitation limit (PQL) or not above the Method Detection Limit (MDL), if requested.  
PQL = Practical Quantitation Limit is the lowest level that can be achieved within specified limits of precision and accuracy during routine laboratory operating conditions.  
D.F. - Dilution Factor

If you have any questions concerning this report contact us at the above phone number.





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WSDOE Lab C567

# DATA REPORT

Page 1 of 1

Client Name: Parberry Environmental Solutions, Inc.  
P O Box 669  
Ferndale, WA 98248

Reference Number: **20-17415**  
Project: Groundwater Testing

Lab Number: 33337  
Field ID: Leachate Line  
Sample Description: LL Sump= Leachate Line Sump  
Matrix: Wastewater  
Sample Date: 6/2/20  
Extraction Date:  
Extraction Method: 3510C

Report Date: 7/23/20  
Date Analyzed: 6/7/20  
Analyst: KH  
Analytical Method: 1613  
Batch: PACE1613\_200607  
Approved By: bj,hy,mle,nml,pdm

Authorized by:

Hiro Yamamoto  
Chief Organic Chemist

CAS	Compound	RESULT	Flag	UNITS	Lab QL	Permit QL	MDL	D.F.	Lab	COMMENT
1746-01-6	Base/Neutral Extractables 2,3,7,8-TCDD(DIOXIN)	ND		pg/L	5	5	1.24	1.00		Analyzed by PACE_MN

**Notes:**

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Lab QL = Laboratory Quantitation Limit is the lowest level that can be achieved within specified limits of precision and accuracy during routine laboratory operating conditions.

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## DATA REPORT

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 Ferndale, WA 98248

Reference Number: **20-17415**  
 Project: Groundwater Testing

Lab Number: 33337  
 Field ID: Leachate Line  
 Sample Description: LL Sump= Leachate Line Sump  
 Matrix: Wastewater  
 Sample Date: 6/2/20  
 Extraction Date: 6/8/20  
 Extraction Method: 3510C

Report Date: 7/23/20  
 Date Analyzed: 6/18/20  
 Analyst: NML  
 Analytical Method: 608  
 Batch: 608\_200608  
 Approved By: bj,hy,mle,nml,pdm

Authorized by:

Hiro Yamamoto  
 Chief Organic Chemist

CAS	Compound	RESULT	Flag	UNITS	Lab QL	Permit QL	MDL	D.F.	Lab	COMMENT
<b>PCBs</b>										
12674-11-2	AROCLOR 1016	ND		ug/L	0.1	0.5	0.1	1.00	a	
11104-28-2	AROCLOR 1221	ND		ug/L	0.5	0.5	0.2	1.00	a	
11141-16-5	AROCLOR 1232	ND		ug/L	0.5	0.5	0.2	1.00	a	
53469-21-9	AROCLOR 1242	ND		ug/L	0.1	0.5	0.1	1.00	a	
12672-29-6	AROCLOR 1248	ND		ug/L	0.5	0.5	0.2	1.00	a	
11097-69-1	AROCLOR 1254	ND		ug/L	0.1	0.5	0.1	1.00	a	
11096-82-5	AROCLOR 1260	ND		ug/L	0.1	0.5	0.1	1.00	a	
<b>Organochlorine Pesticides</b>										
309-00-2	ALDRIN	ND		ug/L	0.05	0.05	0.013	1.00	a	
319-84-6	BHC, ALPHA -	ND		ug/L	0.05	0.05	0.021	1.00	a	
319-85-7	BHC, BETA -	ND		ug/L	0.05	0.05	0.009	1.00	a	
58-89-9	LINDANE (BHC - GAMMA)	ND		ug/L	0.05	0.05	0.015	1.00	a	
319-86-8	BHC, DELTA -	ND		ug/L	0.05	0.05	0.013	1.00	a	
57-74-9	CHLORDANE	ND		ug/L	0.05	0.05	0.015	1.00	a	gamma chlordane
50-29-3	4,4' - DDT	ND		ug/L	0.05	0.05	0.011	1.00	a	
72-55-9	4,4' - DDE	ND		ug/L	0.05	0.05	0.025	1.00	a	
72-54-8	4,4' - DDD	ND		ug/L	0.05	0.05	0.011	1.00	a	
60-57-1	DIELDRIN	ND		ug/L	0.05	0.05	0.017	1.00	a	
959-98-8	ENDOSULFAN I	ND		ug/L	0.05	0.05	0.022	1.00	a	
33213-65-9	ENDOSULFAN II	ND		ug/L	0.05	0.05	0.023	1.00	a	
1031-07-8	ENDOSULFAN SULFATE	ND		ug/L	0.05	0.05	0.017	1.00	a	
72-20-8	ENDRIN	ND		ug/L	0.05	0.05	0.013	1.00	a	
7421-93-4	ENDRIN ALDEHYDE	ND	CV	ug/L	0.05	0.05	0.015	1.00	a	
76-44-8	HEPTACHLOR	ND		ug/L	0.05	0.05	0.024	1.00	a	
1024-57-3	HEPTACHLOR EPOXIDE "B"	ND		ug/L	0.05	0.05	0.014	1.00	a	
8001-35-2	TOXAPHENE	ND		ug/L	0.5	0.5	0.4	1.00	a	

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 Lab QL = Laboratory Quantitation Limit is the lowest level that can be achieved within specified limits of precision and accuracy during routine laboratory operating conditions.  
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WSDOE Lab C567

## DATA REPORT

Page 1 of 1

Client Name: Parberry Environmental Solutions, Inc.  
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Ferndale, WA 98248

Reference Number: **20-17415**  
Project: Groundwater Testing

Lab Number: 33337  
Field ID: Leachate Line  
Sample Description: LL Sump= Leachate Line Sump  
Matrix: Wastewater  
Sample Date: 6/2/20  
Extraction Date: 6/8/20  
Extraction Method: 5030B

Report Date: 7/23/20  
Date Analyzed: 6/8/20  
Analyst: HY  
Analytical Method: 624(pH4)  
Batch: 624\_200608  
Approved By: bj,hy,mle,nml,pdm

Authorized by:

Hiro Yamamoto  
Chief Organic Chemist

CAS	Compound	RESULT	Flag	UNITS	Lab QL	Permit QL	MDL	D.F.	Lab	COMMENT
	Volatiles									
107-02-8	ACROLEIN	ND		ug/L	4.0	10	1.66	1.00	a	
107-13-1	ACRYLONITRILE	ND		ug/L	1.0	2.0	0.56	1.00	a	

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## DATA REPORT

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Reference Number: **20-17415**  
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Lab Number: 33337  
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Extraction Date: 6/8/20  
Extraction Method: 5030B

Report Date: 7/23/20  
Date Analyzed: 6/8/20  
Analyst: HY  
Analytical Method: 624.1  
Batch: 624\_200608  
Approved By: bj,hy,mle,nml,pdm

Authorized by:

Hiro Yamamoto  
Chief Organic Chemist

CAS	Compound	RESULT	Flag	UNITS	Lab QL	Permit QL	MDL	D.F.	Lab	COMMENT
Volatiles										
71-43-2	BENZENE	ND		ug/L	0.5	2.0	0.23	1.00	a	
75-25-2	BROMOFORM	ND		ug/L	0.5	2.0	0.26	1.00	a	
56-23-5	CARBON TETRACHLORIDE	ND		ug/L	0.5	2.0	0.24	1.00	a	
108-90-7	CHLOROENZENE	ND		ug/L	0.5	2.0	0.28	1.00	a	
75-00-3	CHLOROETHANE	ND		ug/L	0.5	2.0	0.34	1.00	a	
110-75-8	2 - CHLOROETHYL VINYL ETHER	ND		ug/L	2.0	2.0	0.46	1.00	a	
67-66-3	CHLOROFORM	ND		ug/L	0.5	2.0	0.25	1.00	a	
124-48-1	CHLORODIBROMOMETHANE	ND		ug/L	0.5	2.0	0.28	1.00	a	
95-50-1	O - DICHLOROENZENE	ND		ug/L	0.5	7.6	0.31	1.00	a	
541-73-1	M - DICHLOROENZENE	ND		ug/L	0.5	7.6	0.29	1.00	a	
106-46-7	P - DICHLOROENZENE	ND		ug/L	0.5	17.6	0.29	1.00	a	
75-27-4	DICHLOROBROMOMETHANE	ND		ug/L	0.5	2.0	0.28	1.00	a	
75-34-3	1,1 - DICHLOROETHANE	ND		ug/L	0.5	2.0	0.32	1.00	a	
107-06-2	1,2 - DICHLOROETHANE	ND		ug/L	0.5	2.0	0.38	1.00	a	
75-35-4	1,1 - DICHLOROETHYLENE	ND		ug/L	0.5	2.0	0.25	1.00	a	
78-87-5	1,2 - DICHLOROPROPANE	ND		ug/L	0.5	2.0	0.22	1.00	a	
10061-01-5	CIS - 1,3 - DICHLOROPROPENE	ND		ug/L	0.5	2.0	0.31	1.00	a	
10061-02-6	TRANS- 1,3 - DICHLOROPROPENE	ND		ug/L	0.5	2.0	0.24	1.00	a	
542-75-6	1,3-DICHLOROPROPYLENE, TOTAL	ND		ug/L	0.5	0.5		1.00	a	
100-41-4	ETHYLBENZENE	0.8		ug/L	0.5	2.0	0.29	1.00	a	
74-83-9	METHYL BROMIDE (BROMOMETHANE)	ND		ug/L	0.5	10.0	0.37	1.00	a	
74-87-3	METHYL CHLORIDE (CHLOROMETHANE)	ND		ug/L	0.5	2.0	0.28	1.00	a	
75-09-2	METHYLENE CHLORIDE	ND		ug/L	0.5	10.0	0.28	1.00	a	
79-34-5	1,1,2,2 - TETRACHLOROETHANE	ND		ug/L	0.5	2.0	0.37	1.00	a	
127-18-4	TETRACHLOROETHYLENE	ND		ug/L	0.5	2.0	0.24	1.00	a	
108-88-3	TOLUENE	ND		ug/L	0.5	2.0	0.24	1.00	a	

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CAS	Compound	RESULT	Flag	UNITS	Lab QL	Permit QL	MDL	D.F.	Lab	COMMENT
156-60-5	1,2 - TRANS - DICHLOROETHYLENE	ND		ug/L	0.5	2.0	0.34	1.00	a	
71-55-6	1,1,1 - TRICHLOROETHANE	ND		ug/L	0.5	2.0	0.26	1.00	a	
79-00-5	1,1,2 - TRICHLOROETHANE	ND		ug/L	0.5	2.0	0.28	1.00	a	
79-01-6	TRICHLOROETHYLENE	ND		ug/L	0.5	2.0	0.29	1.00	a	
75-01-4	VINYL CHLORIDE	ND		ug/L	0.5	2.0	0.28	1.00	a	

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Burlington, WA Corporate Laboratory (a)  
1620 S Walnut St - Burlington, WA 98233 - 800.755.9295 • 360.757.1400  
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Portland, OR Microbiology/Chemistry (c)  
9150 SW Pioneer Ct Ste W - Wilsonville, OR 97070 - 503.682.7802  
Corvallis, OR Microbiology/Chemistry (d)  
1100 pN Circle Blvd, Ste 130 - Corvallis, OR 97330 - 541.753.4946  
Bend, OR Microbiology (e)  
20332 NmEire Blvd Ste 4 - Bend, OR 97701 - 541.639.8425

WSDOE Lab C567

## DATA REPORT

Page 1 of 2

Client Name: Parberry Environmental Solutions, Inc.  
P O Box 669  
Ferndale, WA 98248

Reference Number: **20-17415**  
Project: Groundwater Testing

Lab Number: 33337  
Field ID: Leachate Line  
Sample Description: LL Sump= Leachate Line Sump  
Matrix: Wastewater  
Sample Date: 6/2/20  
Extraction Date: 6/8/20  
Extraction Method: 3510C

Report Date: 7/23/20  
Date Analyzed: 6/23/20  
Analyst: NML  
Analytical Method: 625  
Batch: 625\_200608  
Approved By: bj,hy,mle,nml,pdm

Authorized by:

Hiro Yamamoto  
Chief Organic Chemist

CAS	Compound	RESULT	Flag	UNITS	Lab QL	Permit QL	MDL	D.F.	Lab	COMMENT
Base/Neutral Extractables										
83-32-9	ACENAPHTHENE	ND		ug/L	0.4	0.4	0.04	1.00	a	
208-96-8	ACENAPHTHYLENE	ND		ug/L	0.4	0.6	0.07	1.00	a	
120-12-7	ANTHRACENE	ND		ug/L	0.4	0.6	0.05	1.00	a	
92-87-5	BENZIDINE	ND	P	ug/L	10	24	9.	1.00	a	screening method
85-68-7	BENZYL BUTYL PHTHALATE	ND		ug/L	0.4	0.6	0.03	1.00	a	
56-55-3	BENZ[A]ANTHRACENE	ND		ug/L	0.4	0.6	0.05	1.00	a	
205-99-2	3,4 - BENZOFLUORANTHENE (BENZO[B])	ND		ug/L	0.4	1.6	0.08	1.00	a	unresolved w/ Benzo(J)Fluoranthene
207-08-9	BENZO[K]FLUORANTHENE	ND		ug/L	0.4	1.6	0.08	1.00	a	
50-32-8	BENZO[A]PYRENE	ND		ug/L	0.4	1	0.05	1.00	a	
191-24-2	BENZO[G,H,I]PERYLENE	ND		ug/L	0.4	1	0.05	1.00	a	
111-91-1	BIS(2-CHLOROETHOXY)METHANE	ND		ug/L	0.4	21.2	0.06	1.00	a	
111-44-4	BIS(2-CHLOROETHYL)ETHER	ND		ug/L	0.4	1	0.06	1.00	a	
108-60-1	BIS(2-CHLORO-1-METHYLETHYL)ETHER	ND		ug/L	0.4	0.6	0.06	1.00	a	
117-81-7	Bis(2-ETHYLHEXYL)PHTHALATE	ND		ug/L	0.4	0.5	0.1	1.00	a	
101-55-3	4-BROMOPHENYL PHENYL ETHER	ND		ug/L	0.4	0.4	0.04	1.00	a	
91-58-7	2-CHLORONAPHTHALENE	ND		ug/L	0.4	0.6	0.05	1.00	a	
7005-72-3	4-CHLOROPHENYL PHENYL ETHER	ND		ug/L	0.4	0.5	0.04	1.00	a	
218-01-9	CHRYSENE	ND		ug/L	0.4	0.6	0.06	1.00	a	
53-70-3	DIBENZO[A,H]ANTHRACENE	ND		ug/L	0.4	1.6	0.05	1.00	a	
91-94-1	3,3-DICHLOROBENZIDINE	ND		ug/L	0.4	1	0.2	1.00	a	
84-66-2	DIETHYL PHTHALATE	ND		ug/L	0.4	7.6	0.06	1.00	a	
131-11-3	DIMETHYL PHTHALATE	ND		ug/L	0.4	6.4	0.05	1.00	a	
84-74-2	DI-N-BUTYL PHTHALATE	ND		ug/L	0.4	1	0.07	1.00	a	
121-14-2	2,4-DINITROTOLUENE	ND		ug/L	0.4	0.4	0.07	1.00	a	
606-20-2	2,6-DINITROTOLUENE	ND		ug/L	0.4	0.4	0.09	1.00	a	

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CAS	Compound	RESULT	Flag	UNITS	Lab QL	Permit QL	MDL	D.F.	Lab	COMMENT
117-84-0	DI-N-OCTYL PHTHALATE	ND		ug/L	0.4	0.6	0.02	1.00	a	
122-66-7	1,2-DIPHENYLHYDRAZINE (as Azobenzene)	ND		ug/L	0.4	20	0.06	1.00	a	as Azobenzene
206-44-0	FLUORANTHENE	ND		ug/L	0.4	0.6	0.05	1.00	a	
86-73-7	FLUORENE	ND		ug/L	0.4	0.6	0.05	1.00	a	
118-74-1	HEXACHLOROBENZENE	ND		ug/L	0.4	0.6	0.06	1.00	a	
87-68-3	HEXACHLOROBUTADIENE	ND		ug/L	0.4	1	0.09	1.00	a	
77-47-4	HEXACHLOROCYCLOPENTADIENE	ND		ug/L	0.4	1	0.2	1.00	a	
67-72-1	HEXACHLOROETHANE	ND		ug/L	0.4	1	0.09	1.00	a	
193-39-5	INDENO[1,2,3-C,D]PYRENE	ND		ug/L	0.4	1	0.09	1.00	a	
78-59-1	ISOPHORONE	ND		ug/L	0.4	1	0.07	1.00	a	
91-20-3	NAPHTHALENE	ND		ug/L	0.4	0.6	0.06	1.00	a	
98-95-3	NITROBENZENE	ND		ug/L	0.4	1	0.05	1.00	a	
62-75-9	N-NITROSODIMETHYLAMINE	ND		ug/L	0.4	4	0.3	1.00	a	
621-64-7	N-NITROSODI-N-PROPYLAMINE	ND		ug/L	0.4	1	0.1	1.00	a	
86-30-6	N-NITROSODIPHENYLAMINE	ND		ug/L	0.4	1	0.05	1.00	a	as Diphenylamine
85-01-8	PHENANTHRENE	ND		ug/L	0.4	0.6	0.06	1.00	a	
129-00-0	PYRENE	ND		ug/L	0.4	0.6	0.05	1.00	a	
120-82-1	1,2,4-TRICHLOROBENZENE	ND		ug/L	0.4	0.6	0.05	1.00	a	
<b>Acid Extractables</b>										
95-57-8	2-CHLOROPHENOL	ND		ug/L	1	2	0.1	1.00	a	
120-83-2	2,4-DICHLOROPHENOL	ND		ug/L	1	1	0.2	1.00	a	
105-67-9	2,4-DIMETHYLPHENOL	ND		ug/L	1	1	0.4	1.00	a	
534-52-1	4,6-DINITRO-O-CRESOL	ND		ug/L	1	2	0.3	1.00	a	
51-28-5	2,4-DINITROPHENOL	ND		ug/L	2	2	0.5	1.00	a	
88-75-5	2-NITROPHENOL	ND		ug/L	1	1	0.2	1.00	a	
100-02-7	4-NITROPHENOL	ND		ug/L	1	1	0.3	1.00	a	
59-50-7	P-CHLORO-M-CRESOL	ND		ug/L	1	2	0.2	1.00	a	
87-86-5	PENTACHLOROPHENOL	ND		ug/L	1	1	0.2	1.00	a	
108-95-2	PHENOL	ND		ug/L	1	4	0.1	1.00	a	
88-06-2	2,4,6-TRICHLOROPHENOL	ND		ug/L	1	4	0.1	1.00	a	
<b>Ecology Priority Toxic Chemicals</b>										
205-82-3	BENZO(J)FLUORANTHENE	ND		ug/L	1	1	0.4	1.00	a	unresolved w/ Benzo(B)Fluoranthene
189-55-9	BENZO(R,S,T)PENTAPHENE	ND		ug/L	1	1	0.3	1.00	a	
226-36-8	DIBENZO(A,H)ACRIDINE	ND		ug/L	1	10	0.4	1.00	a	
224-42-0	DIBENZO(A,J)ACRIDINE	ND		ug/L	1	10	0.4	1.00	a	
192-65-4	DIBENZO(A,E)PYRENE	ND		ug/L	1	10	0.5	1.00	a	
189-64-0	DIBENZO(A,H)PYRENE	ND		ug/L	1	10	0.3	1.00	a	
56-49-5	3-METHYL CHOLANTHRENE	ND		ug/L	1	8	0.4	1.00	a	
198-55-0	PERYLENE	ND		ug/L	1	7.6	0.6	1.00	a	

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WSDOE Lab C567

## DATA REPORT

Page 1 of 1

Client Name: Parberry Environmental Solutions, Inc.  
P O Box 669  
Ferndale, WA 98248

Reference Number: **20-17415**  
Project: Groundwater Testing

Lab Number: 33337  
Field ID: Leachate Line  
Sample Description: LL Sump= Leachate Line Sump  
Matrix: Wastewater  
Sample Date: 6/2/20  
Extraction Date:  
Extraction Method:

Report Date: 7/23/20  
Date Analyzed: 6/9/20  
Analyst: BSP  
Analytical Method: D7511-12  
Batch: D7511\_200609  
Approved By: bj,hy,mle,nml,pdm

Authorized by:

Hiro Yamamoto  
Chief Organic Chemist

CAS	Compound	RESULT	Flag	UNITS	Lab QL	Permit QL	MDL	D.F.	Lab	COMMENT
57-12-5	Metals, Cyanide and Total Phenols CYANIDE, TOTAL	16.7		ug/L	10	10	4.	1.00	a	

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## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

### Calibration Check

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	QC Limits*	QC Qualifier Type	Comment
<b>200.8_200603A2</b>	0 ANTIMONY	0.00094	0.001	mg/L	200.8	94	80-120	CAL	
	0 ARSENIC	0.00097	0.001	mg/L	200.8	97	80-120	CAL	
	0 BERYLLIUM	0.00102	0.001	mg/L	200.8	102	80-120	CAL	
	0 CADMIUM	0.00102	0.001	mg/L	200.8	102	80-120	CAL	
	0 CHROMIUM	0.00102	0.001	mg/L	200.8	102	80-120	CAL	
	0 COPPER	0.00097	0.001	mg/L	200.8	97	80-120	CAL	
	0 LEAD	0.001	0.001	mg/L	200.8	100	80-120	CAL	
	0 NICKEL	0.00108	0.001	mg/L	200.8	108	80-120	CAL	
	0 SELENIUM	0.00095	0.001	mg/L	200.8	95	80-120	CAL	
	0 SILVER	0.00108	0.001	mg/L	200.8	108	80-120	CAL	
	0 THALLIUM	0.00099	0.001	mg/L	200.8	99	80-120	CAL	
	0 ZINC	0.0011	0.001	mg/L	200.8	110	80-120	CAL	
	<b>218.6_200602</b>	0 HEXAVALENT CHROMIUM	7.013	7.000	ug/L	218.6	100	85-115	CAL
<b>D7511_200609</b>	0 CYANIDE, TOTAL	0.092	0.100	mg/L	D7511-12	92	90-110	CAL	

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.



## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Laboratory Fortified Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	Limits*	QC Qualifier	QC Type	Comment
<b>200.8_200603A2</b>	0 ANTIMONY	0.0242	0.025	mg/L	200.8	97	85-115	LFB		
	0 ARSENIC	0.0241	0.025	mg/L	200.8	96	85-115	LFB		
	0 BERYLLIUM	0.0229	0.025	mg/L	200.8	92	85-115	LFB		
	0 CADMIUM	0.0239	0.025	mg/L	200.8	96	85-115	LFB		
	0 CHROMIUM	0.0251	0.025	mg/L	200.8	100	85-115	LFB		
	0 COPPER	0.0241	0.025	mg/L	200.8	96	85-115	LFB		
	0 LEAD	0.0255	0.025	mg/L	200.8	102	85-115	LFB		
	0 NICKEL	0.0244	0.025	mg/L	200.8	98	85-115	LFB		
	0 SELENIUM	0.0248	0.025	mg/L	200.8	99	85-115	LFB		
	0 SILVER	0.0127	0.0125	mg/L	200.8	102	85-115	LFB		
	0 THALLIUM	0.0245	0.025	mg/L	200.8	98	85-115	LFB		
	0 ZINC	0.0224	0.025	mg/L	200.8	90	85-115	LFB		
<b>218.6_200602</b>	1 HEXAVALENT CHROMIUM	0.255	0.250	ug/L	218.6	102	90-110	LFB		
	2 HEXAVALENT CHROMIUM	0.516	0.500	ug/L	218.6	103	90-110	LFB		
	3 HEXAVALENT CHROMIUM	1.007	1.000	ug/L	218.6	101	90-110	LFB		
<b>608_200608</b>	0 DECACHLOROBIPHENYL (Surr)	101		%	608		31-157	LFB		
	0 TETRACHLORO-M-XYLENE (Surr)	67		%	608		56-122	LFB		
	0 AROCLOR 1221	1.3	2	ug/L	608	65	15-178	LFB		
	0 4,4' - DDD	0.48	0.5	ug/L	608	96	31-141	LFB		
	0 4,4' - DDE	0.47	0.5	ug/L	608	94	30-145	LFB		
	0 4,4' - DDT	0.49	0.5	ug/L	608	98	25-160	LFB		
	0 ALDRIN	0.37	0.5	ug/L	608	74	42-140	LFB		
	0 BHC, ALPHA -	0.45	0.5	ug/L	608	90	37-140	LFB		
	0 BHC, BETA -	0.45	0.5	ug/L	608	90	17-147	LFB		
	0 BHC, DELTA -	0.48	0.5	ug/L	608	96	19-140	LFB		
	0 CHLORDANE	0.45	0.5	ug/L	608	90	45-119	LFB		gamma chlordane
	0 DIELDRIN	0.48	0.5	ug/L	608	96	36-146	LFB		
	0 ENDOSULFAN I	0.46	0.5	ug/L	608	92	45-153	LFB		
	0 ENDOSULFAN II	0.47	0.5	ug/L	608	94	1-202	LFB		
0 ENDOSULFAN SULFATE	0.48	0.5	ug/L	608	96	26-144	LFB			

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## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Laboratory Fortified Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	QC Limits*	QC Qualifier Type	QC Comment
<b>608_200608</b>	0 ENDRIN	0.48	0.5	ug/L	608	96	30-147	LFB	
	0 ENDRIN ALDEHYDE	0.26	0.5	ug/L	608	52	35-149	LFB	
	0 HEPTACHLOR	0.36	0.5	ug/L	608	72	34-140	LFB	
	0 HEPTACHLOR EPOXIDE "B"	0.47	0.5	ug/L	608	94	37-142	LFB	
	0 LINDANE (BHC - GAMMA)	0.46	0.5	ug/L	608	92	32-140	LFB	
<b>624_200608</b>	0 1,1 - DICHLOROETHANE	4.2	4	ug/L	624.1	105	59-155	LFB	
	0 1,1 - DICHLOROETHYLENE	3.9	4	ug/L	624.1	98	0-234	LFB	
	0 1,1,1 - TRICHLOROETHANE	4.3	4	ug/L	624.1	108	52-162	LFB	
	0 1,1,2 - TRICHLOROETHANE	4.4	4	ug/L	624.1	110	52-150	LFB	
	0 1,1,2,2 - TETRACHLOROETHANE	4.1	4	ug/L	624.1	103	46-157	LFB	
	0 1,2 - DICHLOROETHANE	4.1	4	ug/L	624.1	103	49-155	LFB	
	0 1,2 - DICHLOROPROPANE	4.3	4	ug/L	624.1	108	0-210	LFB	
	0 1,2 - TRANS - DICHLOROETHYLENE	3.8	4	ug/L	624.1	95	54-156	LFB	
	0 2 - CHLOROETHYL VINYL ETHER	9.9	10	ug/L	624.1	99	0-305	LFB	
	0 ACROLEIN	11.2	10	ug/L	624.1	112	60-140	LFB	
	0 ACRYLONITRILE	18.9	20	ug/L	624.1	95	60-140	LFB	
	0 BENZENE	4.2	4	ug/L	624.1	105	37-151	LFB	
	0 BROMOFORM	4.0	4	ug/L	624.1	100	45-169	LFB	
	0 CARBON TETRACHLORIDE	4.3	4	ug/L	624.1	108	70-140	LFB	
	0 CHLOROBENZENE	4.3	4	ug/L	624.1	108	37-160	LFB	
	0 CHLORODIBROMOMETHANE	3.9	4	ug/L	624.1	98	53-149	LFB	
	0 CHLOROETHANE	4.1	4	ug/L	624.1	103	14-230	LFB	
	0 CHLOROFORM	4.1	4	ug/L	624.1	103	15-138	LFB	
	0 CIS - 1,3 - DICHLOROPROPENE	4.4	4	ug/L	624.1	110	0-227	LFB	
	0 DICHLOROBROMOMETHANE	3.9	4	ug/L	624.1	98	35-155	LFB	
	0 ETHYLBENZENE	4.4	4	ug/L	624.1	110	37-162	LFB	
	0 M - DICHLOROBENZENE	4.2	4	ug/L	624.1	105	59-156	LFB	
	0 METHYL BROMIDE (BROMOMETHANE)	4.0	4	ug/L	624.1	100	0-242	LFB	
	0 METHYL CHLORIDE (CHLOROMETHANE)	4.3	4	ug/L	624.1	108	0-273	LFB	
	0 METHYLENE CHLORIDE	3.8	4	ug/L	624.1	95	0-221	LFB	
0 O - DICHLOROBENZENE	4.2	4	ug/L	624.1	105	18-190	LFB		

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## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Laboratory Fortified Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	Limits*	QC Qualifier	QC Type	Comment
<b>624_200608</b>	0 P - DICHLOROBENZENE	4.3	4	ug/L	624.1	108	18-190			LFB
	0 TETRACHLOROETHYLENE	4.4	4	ug/L	624.1	110	64-148			LFB
	0 TOLUENE	4.2	4	ug/L	624.1	105	47-150			LFB
	0 TRANS- 1,3 - DICHLOROPROPENE	4.5	4	ug/L	624.1	113	17-183			LFB
	0 TRICHLOROETHYLENE	4.2	4	ug/L	624.1	105	71-157			LFB
	0 VINYL CHLORIDE	3.7	4	ug/L	624.1	93	0-251			LFB
<b>625_200608</b>	0 2 - FLUOROBIPHENYL (Surr)	38		%	625		71-119			LFB
	0 2 - FLUOROPHENOL (Surr)	24		%	625		32-86			LFB
	0 2,4,6 - TRIBROMOPHENOL (Surr)	42		%	625		64-126			LFB
	0 d5-NITROBENZENE (Surr)	39		%	625		67-126			LFB
	0 p-TERPHENYL-d14 (Surr)	40		%	625		69-116			LFB
	0 1,2,4-TRICHLOROBENZENE	3.4	10	ug/L	625	34	57-130	L2		LFB
	0 1,2-DIPHENYLHYDRAZINE (as Azobenzene)	3.8	10	ug/L	625	38	71-125	L2		LFB
	0 2,4-DINITROTOLUENE	4.1	10	ug/L	625	41	48-127	L2		LFB
	0 2,6-DINITROTOLUENE	4.3	10	ug/L	625	43	68-137	L2		LFB
	0 2-CHLORONAPHTHALENE	3.7	10	ug/L	625	37	65-120	L2		LFB
	0 3,3-DICHLOROBENZIDINE	0.4	1	ug/L	625	40	8-213			LFB
	0 3,4 - BENZOFUORANTHENE (BENZO[B])	7.9	20	ug/L	625	40	42-140	L2		LFB
	0 4-BROMOPHENYL PHENYL ETHER	4.1	10	ug/L	625	41	65-120	L2		LFB
	0 4-CHLOROPHENYL PHENYL ETHER	3.8	10	ug/L	625	38	38-145			LFB
	0 ACENAPHTHENE	3.6	10	ug/L	625	36	60-132	L2		LFB
	0 ACENAPHTHYLENE	3.8	10	ug/L	625	38	54-126	L2		LFB
	0 ANTHRACENE	3.9	10	ug/L	625	39	43-120	L2		LFB
	0 BENZ[A]ANTHRACENE	4.0	10	ug/L	625	40	42-133	L2		LFB
	0 BENZIDINE	5.1	25	ug/L	625	20	1-125			LFB
	0 BENZO[A]PYRENE	4.1	10	ug/L	625	41	32-148			LFB
	0 BENZO[G,H,I]PERYLENE	3.9	10	ug/L	625	39	1-195			LFB
	0 BENZO[K]FLUORANTHENE	3.7	10	ug/L	625	37	25-146			LFB
	0 BENZYL BUTYL PHTHALATE	3.0	10	ug/L	625	30	1-140			LFB
	0 BIS(2-CHLORO-1-METHYLETHYL)ETHER	3.6	10	ug/L	625	36	63-139	L2		LFB
0 BIS(2-CHLOROETHOXY)METHANE	4.0	10	ug/L	625	40	49-165	L2		LFB	

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.



## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Laboratory Fortified Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	QC Limits*	QC Qualifier	QC Type	Comment
625_200608	0 BIS(2-CHLOROETHYL)ETHER	3.7	10	ug/L	625	37	43-126	L2	LFB	
	0 Bis(2-ETHYLHEXYL)PHTHALATE	4.5	10	ug/L	625	45	29-137		LFB	
	0 CHRYSENE	3.9	10	ug/L	625	39	44-140	L2	LFB	
	0 DIBENZO[A,H]ANTHRACENE	4.2	10	ug/L	625	42	1-200		LFB	
	0 DIETHYL PHTHALATE	3.3	10	ug/L	625	33	1-120		LFB	
	0 DIMETHYL PHTHALATE	2.0	10	ug/L	625	20	1-120		LFB	
	0 DI-N-BUTYL PHTHALATE	3.9	10	ug/L	625	39	8-120		LFB	
	0 DI-N-OCTYL PHTHALATE	4.5	10	ug/L	625	45	19-132		LFB	
	0 FLUORANTHENE	4.1	10	ug/L	625	41	43-121	L2	LFB	
	0 FLUORENE	3.9	10	ug/L	625	39	70-120	L2	LFB	
	0 HEXACHLORO BENZENE	3.6	10	ug/L	625	36	8-142		LFB	
	0 HEXACHLOROBUTADIENE	2.7	10	ug/L	625	27	38-120	L2	LFB	
	0 HEXACHLOROCYCLOPENTADIENE	3.0	10	ug/L	625	30	14-170		LFB	
	0 HEXACHLOROETHANE	2.9	10	ug/L	625	29	55-120	L2	LFB	
	0 INDENO[1,2,3,C,D]PYRENE	4.3	10	ug/L	625	43	1-151		LFB	
	0 ISOPHORONE	4.3	10	ug/L	625	43	47-180	L2	LFB	
	0 NAPHTHALENE	3.5	10	ug/L	625	35	36-120	L2	LFB	
	0 NITROBENZENE	3.8	10	ug/L	625	38	54-158	L2	LFB	
	0 N-NITROSODIMETHYLAMINE	2.5	10	ug/L	625	25	20-116		LFB	
	0 N-NITROSODI-N-PROPYLAMINE	4.1	10	ug/L	625	41	14-198		LFB	
	0 N-NITROSODIPHENYLAMINE	4.2	10	ug/L	625	42	65-137	L2	LFB	
	0 PHENANTHRENE	3.9	10	ug/L	625	39	65-120	L2	LFB	
	0 PYRENE	4.1	10	ug/L	625	41	70-120	L2	LFB	
	0 2,4,6-TRICHLOROPHENOL	4.1	10	ug/L	625	41	52-129	L2	LFB	
	0 2,4-DICHLOROPHENOL	4.1	10	ug/L	625	41	53-122	L2	LFB	
	0 2,4-DIMETHYLPHENOL	4.0	10	ug/L	625	40	42-120	L2	LFB	
	0 2,4-DINITROPHENOL	6.9	10	ug/L	625	69	1-173		LFB	
	0 2-CHLOROPHENOL	3.5	10	ug/L	625	35	36-120	L2	LFB	
	0 2-NITROPHENOL	4.3	10	ug/L	625	43	45-167	L2	LFB	
	0 4,6-DINITRO-O-CRESOL	6.4	10	ug/L	625	64	53-130		LFB	
0 4-NITROPHENOL	2.3	10	ug/L	625	23	13-129		LFB		
0 P-CHLORO-M-CRESOL	4.3	10	ug/L	625	43	41-128		LFB		

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

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## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Laboratory Fortified Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True		Method	%	Recovery	Limits*	QC		Comment
			Value	Units					Qualifier	Type	
<b>625_200608</b>	0 PENTACHLOROPHENOL	4.6	10	ug/L	625	46	38-152			LFB	
	0 PHENOL	1.8	10	ug/L	625	18	17-120			LFB	
	0 3-METHYL CHOLANTHRENE	3.7	10	ug/L	625	37	57-119	L2		LFB	
	0 BENZO(J)FLUORANTHENE	7.8	20	ug/L	625	39	42-140	L2		LFB	
	0 BENZO(R,S,T)PENTAPHENE	2.9	10	ug/L	625	29	1-172			LFB	
	0 DIBENZO(A,E)PYRENE	3.0	10	ug/L	625	30	1-199			LFB	
	0 DIBENZO(A,H)ACRIDINE	3.9	10	ug/L	625	39	60-131	L2		LFB	
	0 DIBENZO(A,H)PYRENE	3.3	10	ug/L	625	33	4-160			LFB	
	0 DIBENZO(A,J)ACRIDINE	3.9	10	ug/L	625	39	55-136	L2		LFB	
	0 PERYLENE	4.0	10	ug/L	625	40	57-125	L2		LFB	

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.



**SAMPLE INDEPENDENT  
QUALITY CONTROL REPORT**

Low-Level Lab Fortified Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	QC Limits*	QC Qualifier Type	QC Comment
218.6_200602	0 HEXAVALENT CHROMIUM	0.027	0.030	ug/L	218.6	90	50-150	LLFB	MRL

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.



## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Laboratory Reagent Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	Limits*	QC Qualifier Type	QC	Comment
<b>200.8_200603A2</b>	0 ANTIMONY	ND		mg/L	200.8		0-0	LRB		
	0 ARSENIC	ND		mg/L	200.8		0-0	LRB		
	0 BERYLLIUM	ND		mg/L	200.8		0-0	LRB		
	0 CADMIUM	ND		mg/L	200.8		0-0	LRB		
	0 CHROMIUM	ND		mg/L	200.8		0-0	LRB		
	0 COPPER	ND		mg/L	200.8		0-0	LRB		
	0 LEAD	ND		mg/L	200.8		0-0	LRB		
	0 NICKEL	ND		mg/L	200.8		0-0	LRB		
	0 SELENIUM	ND		mg/L	200.8		0-0	LRB		
	0 SILVER	ND		mg/L	200.8		0-0	LRB		
	0 THALLIUM	ND		mg/L	200.8		0-0	LRB		
	0 ZINC	ND		mg/L	200.8		0-0	LRB		
<b>218.6_200602</b>	0 HEXAVALENT CHROMIUM	ND		ug/L	218.6		0-0	LRB		
	1 HEXAVALENT CHROMIUM	ND		ug/L	218.6		0-0	LRB		
	2 HEXAVALENT CHROMIUM	ND		ug/L	218.6		0-0	LRB		
<b>D7511_200609</b>	0 CYANIDE, TOTAL	ND		mg/L	D7511-12		0-0	LRB		

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.





## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Method Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	Limits*	QC Qualifier Type	QC Comment
<b>200.8_200603A2</b>	0 ANTIMONY	ND		mg/L	200.8		0-0	MB	
	0 ARSENIC	ND		mg/L	200.8		0-0	MB	
	0 BERYLLIUM	ND		mg/L	200.8		0-0	MB	
	0 CADMIUM	ND		mg/L	200.8		0-0	MB	
	0 CHROMIUM	ND		mg/L	200.8		0-0	MB	
	0 COPPER	ND		mg/L	200.8		0-0	MB	
	0 LEAD	ND		mg/L	200.8		0-0	MB	
	0 NICKEL	ND		mg/L	200.8		0-0	MB	
	0 SELENIUM	ND		mg/L	200.8		0-0	MB	
	0 SILVER	ND		mg/L	200.8		0-0	MB	
	0 THALLIUM	ND		mg/L	200.8		0-0	MB	
	0 ZINC	ND		mg/L	200.8		0-0	MB	
<b>608_200608</b>	0 DECACHLOROBIPHENYL (Surr)	114		%	608		31-157	MB	
	0 TETRACHLORO-M-XYLENE (Surr)	60		%	608		56-122	MB	
	0 AROCLOR 1016	ND		ug/L	608		0-0	MB	
	0 AROCLOR 1221	ND		ug/L	608		0-0	MB	
	0 AROCLOR 1232	ND		ug/L	608		0-0	MB	
	0 AROCLOR 1242	ND		ug/L	608		0-0	MB	
	0 AROCLOR 1248	ND		ug/L	608		0-0	MB	
	0 AROCLOR 1254	ND		ug/L	608		0-0	MB	
	0 AROCLOR 1260	ND		ug/L	608		0-0	MB	
	0 4,4' - DDD	ND		ug/L	608		0-0	MB	
	0 4,4' - DDE	ND		ug/L	608		0-0	MB	
	0 4,4' - DDT	ND		ug/L	608		0-0	MB	
	0 ALDRIN	ND		ug/L	608		0-0	MB	
	0 BHC, ALPHA -	ND		ug/L	608		0-0	MB	
	0 BHC, BETA -	ND		ug/L	608		0-0	MB	
	0 BHC, DELTA -	ND		ug/L	608		0-0	MB	
	0 CHLORDANE	ND		ug/L	608		0-0	MB	
	0 DIELDRLIN	ND		ug/L	608		0-0	MB	
	0 ENDOSULFAN I	ND		ug/L	608		0-0	MB	

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

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## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Method Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	Limits*	QC Qualifier	QC Type	Comment
<b>608_200608</b>	0 ENDOSULFAN II	ND		ug/L	608		0-0		MB	
	0 ENDOSULFAN SULFATE	ND		ug/L	608		0-0		MB	
	0 ENDRIN	ND		ug/L	608		0-0		MB	
	0 ENDRIN ALDEHYDE	ND		ug/L	608		0-0		MB	
	0 HEPTACHLOR	ND		ug/L	608		0-0		MB	
	0 HEPTACHLOR EPOXIDE "B"	ND		ug/L	608		0-0		MB	
	0 LINDANE (BHC - GAMMA)	ND		ug/L	608		0-0		MB	
	0 TOXAPHENE	ND		ug/L	608		0-0		MB	
<b>624_200608</b>	0 1,1 - DICHLOROETHANE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 1,1 - DICHLOROETHYLENE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 1,1,1 - TRICHLOROETHANE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 1,1,2 - TRICHLOROETHANE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 1,1,2,2 - TETRACHLOROETHANE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 1,2 - DICHLOROETHANE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 1,2 - DICHLOROPROPANE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 1,2 - TRANS - DICHLOROETHYLENE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 2 - CHLOROETHYL VINYL ETHER	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 ACROLEIN	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 ACRYLONITRILE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 BENZENE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 BROMOFORM	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 CARBON TETRACHLORIDE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 CHLOROBENZENE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 CHLORODIBROMOMETHANE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 CHLOROETHANE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 CHLOROFORM	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 CIS - 1,3 - DICHLOROPROPENE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 DICHLOROBROMOMETHANE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 ETHYLBENZENE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 M - DICHLOROBENZENE	ND		ug/L	624.1		0-0		MB	TB 20-17415
	0 METHYL BROMIDE (BROMOMETHANE)	ND		ug/L	624.1		0-0		MB	TB 20-17415

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

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## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Method Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	Limits*	QC Qualifier Type	QC Comment
<b>624_200608</b>	0 METHYL CHLORIDE (CHLOROMETHANE)	ND		ug/L	624.1		0-0	MB	TB 20-17415
	0 METHYLENE CHLORIDE	ND		ug/L	624.1		0-0	MB	TB 20-17415
	0 O - DICHLOROBENZENE	ND		ug/L	624.1		0-0	MB	TB 20-17415
	0 P - DICHLOROBENZENE	ND		ug/L	624.1		0-0	MB	TB 20-17415
	0 TETRACHLOROETHYLENE	ND		ug/L	624.1		0-0	MB	TB 20-17415
	0 TOLUENE	ND		ug/L	624.1		0-0	MB	TB 20-17415
	0 TRANS- 1,3 - DICHLOROPROPENE	ND		ug/L	624.1		0-0	MB	TB 20-17415
	0 TRICHLOROETHYLENE	ND		ug/L	624.1		0-0	MB	TB 20-17415
	0 VINYL CHLORIDE	ND		ug/L	624.1		0-0	MB	TB 20-17415
<b>625_200608</b>	0 2 - FLUOROBIPHENYL (Surr)	45		%	625		71-119	MB	
	0 2 - FLUOROPHENOL (Surr)	30		%	625		32-86	MB	
	0 2,4,6 - TRIBROMOPHENOL (Surr)	45		%	625		64-126	MB	
	0 d5-NITROBENZENE (Surr)	48		%	625		67-126	MB	
	0 p-TERPHENYL-d14 (Surr)	50		%	625		69-116	MB	
	0 1,2,4-TRICHLOROBENZENE	ND		ug/L	625		0-0	MB	
	0 1,2-DIPHENYLHYDRAZINE (as Azobenzene)	ND		ug/L	625		0-0	MB	
	0 2,4-DINITROTOLUENE	ND		ug/L	625		0-0	MB	
	0 2,6-DINITROTOLUENE	ND		ug/L	625		0-0	MB	
	0 2-CHLORONAPHTHALENE	ND		ug/L	625		0-0	MB	
	0 3,3-DICHLOROBENZIDINE	ND		ug/L	625		0-0	MB	
	0 3,4 - BENZOFLUORANTHENE (BENZO[B])	ND		ug/L	625		0-0	MB	
	0 4-BROMOPHENYL PHENYL ETHER	ND		ug/L	625		0-0	MB	
	0 4-CHLOROPHENYL PHENYL ETHER	ND		ug/L	625		0-0	MB	
	0 ACENAPHTHENE	ND		ug/L	625		0-0	MB	
	0 ACENAPHTHYLENE	ND		ug/L	625		0-0	MB	
	0 ANTHRACENE	ND		ug/L	625		0-0	MB	
	0 BENZ[A]ANTHRACENE	ND		ug/L	625		0-0	MB	
	0 BENZIDINE	ND		ug/L	625		0-0	MB	
	0 BENZO[A]PYRENE	ND		ug/L	625		0-0	MB	
0 BENZO[G,H,I]PERYLENE	ND		ug/L	625		0-0	MB		
0 BENZO[K]FLUORANTHENE	ND		ug/L	625		0-0	MB		

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.



## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Method Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	Limits*	QC Qualifier Type	QC Comment
625_200608	0 BENZYL BUTYL PHTHALATE	ND		ug/L	625	0-0		MB	
	0 BIS(2-CHLORO-1-METHYLETHYL)ETHER	ND		ug/L	625	0-0		MB	
	0 BIS(2-CHLOROETHOXY)METHANE	ND		ug/L	625	0-0		MB	
	0 BIS(2-CHLOROETHYL)ETHER	ND		ug/L	625	0-0		MB	
	0 Bis(2-ETHYLHEXYL)PHTHALATE	ND		ug/L	625	0-0		MB	
	0 CHRYSENE	ND		ug/L	625	0-0		MB	
	0 DIBENZO[A,H]ANTHRACENE	ND		ug/L	625	0-0		MB	
	0 DIETHYL PHTHALATE	ND		ug/L	625	0-0		MB	
	0 DIMETHYL PHTHALATE	ND		ug/L	625	0-0		MB	
	0 DI-N-BUTYL PHTHALATE	ND		ug/L	625	0-0		MB	
	0 DI-N-OCTYL PHTHALATE	ND		ug/L	625	0-0		MB	
	0 FLUORANTHENE	ND		ug/L	625	0-0		MB	
	0 FLUORENE	ND		ug/L	625	0-0		MB	
	0 HEXACHLORO BENZENE	ND		ug/L	625	0-0		MB	
	0 HEXACHLORO BUTADIENE	ND		ug/L	625	0-0		MB	
	0 HEXACHLORO CYCLOPENTADIENE	ND		ug/L	625	0-0		MB	
	0 HEXACHLORO ETHANE	ND		ug/L	625	0-0		MB	
	0 INDENO[1,2,3-C,D]PYRENE	ND		ug/L	625	0-0		MB	
	0 ISOPHORONE	ND		ug/L	625	0-0		MB	
	0 NAPHTHALENE	ND		ug/L	625	0-0		MB	
	0 NITROBENZENE	ND		ug/L	625	0-0		MB	
	0 N-NITROSODIMETHYLAMINE	ND		ug/L	625	0-0		MB	
	0 N-NITROSODI-N-PROPYLAMINE	ND		ug/L	625	0-0		MB	
	0 N-NITROSODIPHENYLAMINE	ND		ug/L	625	0-0		MB	
	0 PHENANTHRENE	ND		ug/L	625	0-0		MB	
	0 PYRENE	ND		ug/L	625	0-0		MB	
	0 2,4,6-TRICHLOROPHENOL	ND		ug/L	625	0-0		MB	
	0 2,4-DICHLOROPHENOL	ND		ug/L	625	0-0		MB	
	0 2,4-DIMETHYLPHENOL	ND		ug/L	625	0-0		MB	
	0 2,4-DINITROPHENOL	ND		ug/L	625	0-0		MB	
	0 2-CHLOROPHENOL	ND		ug/L	625	0-0		MB	
	0 2-NITROPHENOL	ND		ug/L	625	0-0		MB	

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.



## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Method Blank

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	Limits*	QC Qualifier Type	QC Comment
<b>625_200608</b>	0 4,6-DINITRO-O-CRESOL	ND		ug/L	625		0-0	MB	
	0 4-NITROPHENOL	ND		ug/L	625		0-0	MB	
	0 P-CHLORO-M-CRESOL	ND		ug/L	625		0-0	MB	
	0 PENTACHLOROPHENOL	ND		ug/L	625		0-0	MB	
	0 PHENOL	ND		ug/L	625		0-0	MB	
	0 3-METHYL CHOLANTHRENE	ND		ug/L	625		0-0	MB	
	0 BENZO(J)FLUORANTHENE	ND		ug/L	625		0-0	MB	
	0 BENZO(R,S,T)PENTAPHENE	ND		ug/L	625		0-0	MB	
	0 DIBENZO(A,E)PYRENE	ND		ug/L	625		0-0	MB	
	0 DIBENZO(A,H)ACRIDINE	ND		ug/L	625		0-0	MB	
	0 DIBENZO(A,H)PYRENE	ND		ug/L	625		0-0	MB	
	0 DIBENZO(A,J)ACRIDINE	ND		ug/L	625		0-0	MB	
	0 PERYLENE	ND		ug/L	625		0-0	MB	
	<b>D7511_200609</b>	0 CYANIDE, TOTAL	ND		mg/L	D7511-12		0-0	MB

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

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## SAMPLE INDEPENDENT QUALITY CONTROL REPORT

Quality Control Sample

Reference Number: **20-17415**

Report Date: 07/23/20

Batch	Analyte	Result	True Value	Units	Method	% Recovery	Limits*	QC Qualifier Type	QC Comment
<b>200.8_200603A2</b>	0 ANTIMONY	0.0376	0.04	mg/L	200.8	94	90-110	QCS	
	0 ARSENIC	0.0392	0.04	mg/L	200.8	98	90-110	QCS	
	0 BERYLLIUM	0.0407	0.04	mg/L	200.8	102	90-110	QCS	
	0 CADMIUM	0.0407	0.04	mg/L	200.8	102	90-110	QCS	
	0 CHROMIUM	0.0408	0.04	mg/L	200.8	102	90-110	QCS	
	0 COPPER	0.0396	0.04	mg/L	200.8	99	90-110	QCS	
	0 LEAD	0.0408	0.04	mg/L	200.8	102	90-110	QCS	
	0 NICKEL	0.043	0.04	mg/L	200.8	108	90-110	QCS	
	0 SELENIUM	0.0415	0.04	mg/L	200.8	104	90-110	QCS	
	0 SILVER	0.0206	0.02	mg/L	200.8	103	90-110	QCS	
	0 THALLIUM	0.0391	0.04	mg/L	200.8	98	90-110	QCS	
	0 ZINC	0.0405	0.04	mg/L	200.8	101	90-110	QCS	
<b>218.6_200602</b>	0 HEXAVALENT CHROMIUM	0.366	0.364	ug/L	218.6	101	90-110	QCS	
<b>D7511_200609</b>	0 CYANIDE, TOTAL	0.097	0.100	mg/L	D7511-12	97	90-110	QCS	
	1 CYANIDE, TOTAL	0.136	0.125	mg/L	D7511-12	109	90-110	QCS	

\*Notation:

% Recovery = (Result of Analysis)/(True Value) \* 100

NA = Indicates % Recovery could not be calculated.

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**SAMPLE DEPENDENT  
 QUALITY CONTROL REPORT**  
 Duplicate, Matrix Spike/Matrix Spike Duplicate and Confirmation Result Report

Batch	Sample Analyte	Result	Duplicate Result	Units	%RPD	Limits	QC		
							Qualifier	Type	Comments
<b>Duplicate</b>									
<b>200.8_200603A2</b>									
7440-36-0	33337 ANTIMONY	1.9	0.3	ug/L	145.5	0-20	INH	DUP	
7440-38-2	33337 ARSENIC	5.2	3.9	ug/L	28.6	0-20	INH	DUP	
7440-41-7	33337 BERYLLIUM	0.01	ND	ug/L	NA	0-20	IEV	DUP	
7440-43-9	33337 CADMIUM	0.02	ND	ug/L	NA	0-20	IEV	DUP	
7440-47-3	33337 CHROMIUM	31.2	31.3	ug/L	0.3	0-20		DUP	
7440-50-8	33337 COPPER	1.5	1.3	ug/L	14.3	0-20		DUP	
7439-92-1	33337 LEAD	1.2	1.0	ug/L	18.2	0-20		DUP	
7440-02-0	33337 NICKEL	2.0	2.3	ug/L	14.0	0-20		DUP	
7782-49-2	33337 SELENIUM	4.4	4.0	ug/L	9.5	0-20		DUP	
7440-22-4	33337 SILVER	0.1	0.01	ug/L	163.6	0-20	IEV	DUP	
7440-28-0	33337 THALLIUM	0.10	ND	ug/L	NA	0-20		DUP	
7440-66-6	33337 ZINC	11.8	4.5	ug/L	89.6	0-20	INH	DUP	
<b>218.6_200602</b>									
18540-29-9	32838 HEXAVALENT CHROMIUM	0.056	0.057	ug/L	1.8	0-20		DUP	
<b>D7511_200609</b>									
57-12-5	33987 CYANIDE, TOTAL	ND	ND	mg/L	NA	0-20		DUP	

%RPD = Relative Percent Difference  
 NA = Indicates %RPD could not be calculated  
 Matrix Spike (MS)/Matrix Spike Duplicate (MSD) analyses are used to determine the accuracy (MS) and precision (MSD) of an analytical method in a given sample matrix. Therefore, the usefulness of this report is limited to samples of similar matrices analyzed in the same analytical batch.  
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 FORM: QC Dependent.rpt

Batch/CAS	Sample Analyte	Result	Duplicate		Spike Conc	Units	Percent Recovery		Limits*	%RPD	Limits*	Qualifier	Type	Comments
			Spike Result	Spike Result			MS	MSD						
<b>Laboratory Fortified Matrix (MS)</b>														
<b>200.8_200603A2</b>														
7440-36-0	33337 ANTIMONY	1.9	25.2	25.0	25.0	ug/L	93		70-130	NA	0-20		LFM	
7440-38-2	33337 ARSENIC	5.2	28.0	25.0	25.0	ug/L	91		70-130	NA	0-20		LFM	
7440-41-7	33337 BERYLLIUM	0.01	22.9	25.0	25.0	ug/L	92		70-130	NA	0-20		LFM	
7440-43-9	33337 CADMIUM	0.02	23.6	25.0	25.0	ug/L	94		70-130	NA	0-20		LFM	
7440-47-3	33337 CHROMIUM	31.2	56.9	25.0	25.0	ug/L	103		70-130	NA	0-20		LFM	
7440-50-8	33337 COPPER	1.5	25.6	25.0	25.0	ug/L	96		70-130	NA	0-20		LFM	
7439-92-1	33337 LEAD	1.2	25.6	25.0	25.0	ug/L	98		70-130	NA	0-20		LFM	
7440-02-0	33337 NICKEL	2.0	26.5	25.0	25.0	ug/L	98		70-130	NA	0-20		LFM	
7782-49-2	33337 SELENIUM	4.4	24.8	25.0	25.0	ug/L	82		70-130	NA	0-20		LFM	
7440-22-4	33337 SILVER	0.1	12.3	12.5	12.5	ug/L	98		70-130	NA	0-20		LFM	
7440-28-0	33337 THALLIUM	0.10	23.6	25.0	25.0	ug/L	94		70-130	NA	0-20		LFM	
7440-66-6	33337 ZINC	11.8	30.0	25.0	25.0	ug/L	73		70-130	NA	0-20		LFM	
<b>218.6_200602</b>														
18540-29-9	31597 HEXAVALENT CHROMIUM	0.106	0.380	0.380	0.300	ug/L	91	91	90-110	0.0	0-20		LFM	
<b>608_200608</b>														
43-13-9	33337 DECACHLOROBIPHENYL (Surr)	110	111	108		%		NA	31-157	NA	0-20		LFM	
42-13-7	33337 TETRACHLORO-M-XYLENE (Surr)	87	94	86		%		NA	56-122	NA	0-20		LFM	
72-54-8	33337 4,4'-DDD	ND	0.48	0.46	0.5	ug/L	96		31-141	4.3	0-39		LFM	
72-55-9	33337 4,4'-DDE	ND	0.49	0.46	0.5	ug/L	98		30-145	6.3	0-35		LFM	
50-29-3	33337 4,4'-DDT	ND	0.49	0.46	0.5	ug/L	98		25-160	6.3	0-42		LFM	
309-00-2	33337 ALDRIN	ND	0.48	0.42	0.5	ug/L	96		42-140	13.3	0-35		LFM	
11104-28-2	33337 AROCLOR 1221	ND	1.4	1.3	2	ug/L	70		15-178	7.4	0-48		LFM	
319-84-6	33337 BHC, ALPHA -	ND	0.46	0.41	0.5	ug/L	92		37-140	11.5	0-36		LFM	
319-85-7	33337 BHC, BETA -	ND	0.42	0.39	0.5	ug/L	84		17-147	7.4	0-44		LFM	
319-86-8	33337 BHC, DELTA -	ND	0.46	0.42	0.5	ug/L	92		19-140	9.1	0-52		LFM	
57-74-9	33337 CHLORDANE	ND	0.45	0.42	0.5	ug/L	90		60-140	6.9	0-20		LFM	gamma chlordane
60-57-1	33337 DIELDRIN	ND	0.53	0.49	0.5	ug/L	106		36-146	7.8	0-49		LFM	
959-98-8	33337 ENDOSULFAN I	ND	0.51	0.47	0.5	ug/L	102		45-153	8.2	0-28		LFM	
33213-65-9	33337 ENDOSULFAN II	ND	0.52	0.50	0.5	ug/L	104	100	1-202	3.9	0-53		LFM	
1031-07-8	33337 ENDOSULFAN SULFATE	ND	0.52	0.50	0.5	ug/L	104	100	26-144	3.9	0-38		LFM	
72-20-8	33337 ENDRIN	ND	0.47	0.48	0.5	ug/L	94	96	30-147	2.1	0-48		LFM	
7421-93-4	33337 ENDRIN ALDEHYDE	ND	0.04	0.08	0.5	ug/L	8	16	35-149	66.7	0-40	M2	LFM	

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Batch/CAS	Sample Analyte	Result	Spike Result	Spike Result	Spike Conc	Units	Percent Recovery		Limits*	%RPD	Limits*	Qualifier	Type	Comments
							MS	MSD						
76-44-8	33337 HEPTACHLOR	ND	0.46	0.44	0.5	ug/L	92	88	34-140	4.4	0-43		LFM	
1024-67-3	33337 HEPTACHLOR EPOXIDE "B"	ND	0.52	0.48	0.5	ug/L	104	96	37-142	8.0	0-26		LFM	
58-89-9	33337 LINDANE (BHC - GAMMA)	ND	0.43	0.37	0.5	ug/L	86	74	32-140	15.0	0-39		LFM	
<b>624_200608</b>														
75-34-3	33337 1,1 - DICHLOROETHANE	ND	4.1	4.1	4	ug/L	103	103	59-155	0.0	0-20		LFM	
75-35-4	33337 1,1 - DICHLOROETHYLENE	ND	3.8	3.7	4	ug/L	95	93	1-234	2.7	0-20		LFM	
71-55-6	33337 1,1,1 - TRICHLOROETHANE	ND	4.1	4.1	4	ug/L	103	103	52-162	0.0	0-20		LFM	
79-00-5	33337 1,1,2 - TRICHLOROETHANE	ND	4.2	4.2	4	ug/L	105	105	52-150	0.0	0-20		LFM	
79-34-5	33337 1,1,2,2 - TETRACHLOROETHANE	ND	3.9	3.8	4	ug/L	98	95	46-157	2.6	0-20		LFM	
107-06-2	33337 1,2 - DICHLOROETHANE	ND	4.1	4.0	4	ug/L	103	100	49-155	2.5	0-20		LFM	
78-87-5	33337 1,2 - DICHLOROPROPANE	ND	4.1	4.0	4	ug/L	103	100	1-210	2.5	0-20		LFM	
156-60-5	33337 1,2 - TRANS - DICHLOROETHYLENE	ND	3.7	3.7	4	ug/L	93	93	54-156	0.0	0-20		LFM	
110-75-8	33337 2 - CHLOROETHYL VINYL ETHER	ND	10.9	10.2	10	ug/L	109	102	1-305	6.6	0-20		LFM	
107-02-8	33337 ACROLEIN	ND	4.9	4.0	10	ug/L	49	40	60-140	20.2	0-20	M2	LFM	
107-13-1	33337 ACRYLONITRILE	ND	9.9	9.5	10	ug/L	99	95	60-140	4.1	0-20		LFM	
71-43-2	33337 BENZENE	ND	4.1	4.1	4	ug/L	103	103	37-151	0.0	0-20		LFM	
75-25-2	33337 BROMOFORM	ND	3.8	3.5	4	ug/L	95	88	45-169	8.2	0-20		LFM	
56-23-5	33337 CARBON TETRACHLORIDE	ND	4.2	4.2	4	ug/L	105	105	70-140	0.0	0-20		LFM	
108-90-7	33337 CHLOROBENZENE	ND	4.3	4.3	4	ug/L	108	108	37-160	0.0	0-20		LFM	
124-48-1	33337 CHLORODIBROMOMETHANE	ND	3.8	3.6	4	ug/L	95	90	53-149	5.4	0-20		LFM	
75-00-3	33337 CHLOROETHANE	ND	4.1	4.3	4	ug/L	103	108	14-230	4.8	0-20		LFM	
67-66-3	33337 CHLOROFORM	ND	4.0	4.0	4	ug/L	100	100	51-138	0.0	0-20		LFM	
10061-01-5	33337 CIS - 1,3 - DICHLOROPROPENE	ND	4.2	3.9	4	ug/L	105	98	1-227	7.4	0-20		LFM	
75-27-4	33337 DICHLOROBROMOMETHANE	ND	3.7	3.7	4	ug/L	93	93	35-155	0.0	0-20		LFM	
100-41-4	33337 ETHYLBENZENE	0.8	4.8	4.8	4	ug/L	100	100	37-162	0.0	0-20		LFM	
541-73-1	33337 M - DICHLOROBENZENE	ND	3.9	3.8	4	ug/L	98	95	59-156	2.6	0-20		LFM	
74-83-9	33337 METHYL BROMIDE (BROMOMETHANE)	ND	3.7	3.6	4	ug/L	93	90	1-242	2.7	0-20		LFM	
74-87-3	33337 METHYL CHLORIDE (CHLOROMETHANE)	ND	4.2	3.5	4	ug/L	105	88	1-273	18.2	0-20		LFM	
75-09-2	33337 METHYLENE CHLORIDE	ND	3.9	4.0	4	ug/L	98	100	1-221	2.5	0-20		LFM	
95-50-1	33337 O - DICHLOROBENZENE	ND	4.0	3.9	4	ug/L	100	98	18-190	2.5	0-20		LFM	
106-46-7	33337 P - DICHLOROBENZENE	ND	4.2	4.1	4	ug/L	105	103	18-190	2.4	0-20		LFM	
127-18-4	33337 TETRACHLOROETHYLENE	ND	4.2	4.2	4	ug/L	105	105	64-148	0.0	0-20		LFM	
108-88-3	33337 TOLUENE	ND	4.1	4.0	4	ug/L	103	100	47-150	2.5	0-20		LFM	
10061-02-6	33337 TRANS- 1,3 - DICHLOROPROPENE	ND	4.3	3.9	4	ug/L	108	98	17-183	9.8	0-20		LFM	

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FORM: QC Dependent.rpt

Batch/CAS	Sample Analyte	Result	Spike Result	Spike Result	Duplicate Spike Result	Duplicate Spike Conc	Units	Percent Recovery		Limits*	%RPD	Limits*	QC Qualifier	Type	Comments
								MS	MSD						
79-01-6	33337 TRICHLOROETHYLENE	ND	4.1	4.2	4.2	4	ug/L	103	105	71-157	2.4	0-20	LFM		
75-01-4	33337 VINYL CHLORIDE	ND	3.5	3.6	3.6	4	ug/L	88	90	1-251	2.8	0-20	LFM		
<b>625_200608</b>															
321-60-8	33337 2 - FLUOROBIPHENYL (Surr)	54	55	58	58		%		NA	71-119	NA	0-20	LFM		
367-12-4	33337 2 - FLUOROPHENOL (Surr)	35	36	36	36		%		NA	32-86	NA	0-20	LFM		
118-79-6	33337 2,4,6 - TRIBROMOPHENOL (Surr)	63	67	68	68		%		NA	64-126	NA	0-20	LFM		
98-95-3	33337 d5-NITROBENZENE (Surr)	53	55	55	55		%		NA	67-126	NA	0-20	LFM		
1718-51-0	33337 p-TERPHENYL-d14 (Surr)	45	45	44	44		%		NA	69-116	NA	0-20	LFM		
120-82-1	33337 1,2,4-TRICHLOROBENZENE	ND	5.1	5.0	5.0	10	ug/L	51	50	44-142	2.0	0-50	LFM		
122-66-7	33337 1,2-DIPHENYLHYDRAZINE (as AzobenzND	ND	5.6	5.9	5.9	10	ug/L	56	59	67-127	5.2	0-40	LFM	L2	
88-06-2	33337 2,4,6-TRICHLOROPHENOL	ND	6.5	6.4	6.4	10	ug/L	65	64	37-144	1.6	0-40	LFM		
120-83-2	33337 2,4-DICHLOROPHENOL	ND	6.2	6.2	6.2	10	ug/L	62	62	39-135	0.0	0-40	LFM		
105-67-9	33337 2,4-DIMETHYLPHENOL	ND	6.3	6.1	6.1	10	ug/L	63	61	32-120	3.2	0-40	LFM		
51-28-5	33337 2,4-DINITROPHENOL	ND	4.7	4.7	4.7	10	ug/L	47	47	1-191	0.0	0-40	LFM		
121-14-2	33337 2,4-DINITROTOLUENE	ND	6.4	6.3	6.3	10	ug/L	64	63	39-139	1.6	0-42	LFM		
606-20-2	33337 2,6-DINITROTOLUENE	ND	6.9	6.7	6.7	10	ug/L	69	67	50-158	2.9	0-40	LFM		
91-58-7	33337 2-CHLORONAPHTHALENE	ND	5.6	5.7	5.7	10	ug/L	56	57	60-120	1.8	0-40	LFM	L2	
95-57-8	33337 2-CHLOROPHENOL	ND	5.4	5.3	5.3	10	ug/L	54	53	23-134	1.9	0-40	LFM		
88-75-5	33337 2-NITROPHENOL	ND	6.8	6.8	6.8	10	ug/L	68	68	29-182	0.0	0-40	LFM		
91-94-1	33337 3,3-DICHLOROBENZIDINE	ND	0.3	0.4	0.4	1	ug/L	30	40	1-262	28.6	0-40	LFM		
205-99-2	33337 3,4 - BENZOFLUORANTHENE (BENZO[ND	ND	7.9	8.0	8.0	20	ug/L	40	40	24-159	1.3	0-40	LFM		
56-49-5	33337 3-METHYL CHOLANTHRENE	ND	3.6	3.6	3.6	10	ug/L	36	36	5-125	0.0	0-40	LFM		
534-52-1	33337 4,6-DINITRO-O-CRESOL	ND	8.2	8.1	8.1	10	ug/L	82	81	1-181	1.2	0-40	LFM		
101-55-3	33337 4-BROMOPHENYL PHENYL ETHER	ND	6.0	6.0	6.0	10	ug/L	60	60	53-127	0.0	0-40	LFM		
7005-72-3	33337 4-CHLOROPHENYL PHENYL ETHER	ND	5.8	5.7	5.7	10	ug/L	58	57	25-158	1.7	0-40	LFM		
100-02-7	33337 4-NITROPHENOL	ND	3.1	3.1	3.1	10	ug/L	31	31	1-132	0.0	0-40	LFM		
83-32-9	33337 ACENAPHTHENE	ND	5.7	5.8	5.8	10	ug/L	57	58	47-145	1.7	0-40	LFM		
208-96-8	33337 ACENAPHTHYLENE	ND	5.7	5.7	5.7	10	ug/L	57	57	33-145	0.0	0-40	LFM		
120-12-7	33337 ANTHRACENE	ND	6.0	5.9	5.9	10	ug/L	60	59	27-133	1.7	0-40	LFM		
56-55-3	33337 BENZ[A]ANTHRACENE	ND	5.3	5.0	5.0	10	ug/L	53	50	33-143	5.8	0-40	LFM		
92-87-5	33337 BENZIDINE	ND	ND	ND	ND	25	ug/L		NA	1-59	NA	0-40	LFM	P	
205-82-3	33337 BENZO(J)FLUORANTHENE	ND	7.7	7.8	7.8	20	ug/L	39	39	21-123	1.3	0-40	LFM		
189-55-9	33337 BENZO(R,S,T)PENTAPHENE	ND	1.7	1.8	1.8	10	ug/L	17	18	1-156	5.7	0-40	LFM		
50-32-8	33337 BENZO(A)PYRENE	ND	3.6	3.5	3.5	10	ug/L	36	35	17-163	2.8	0-40	LFM		

%RPD = Relative Percent Difference

NA = Indicates %RPD could not be calculated

Matrix Spike (MS)/Matrix Spike Duplicate (MSD) analyses are used to determine the accuracy (MS) and precision (MSD) of an analytical method in a given sample matrix. Therefore, the usefulness of this report is limited to samples of similar matrices analyzed in the same analytical batch.

Only Duplicate sample with detections are listed in this report

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.

FORM: QC Dependent.rpt

Batch/CAS	Sample Analyte	Result	Spike Result	Spike Result	Duplicate Spike Result	Spike Conc	Units	Percent Recovery		Limits*	%RPD	Limits*	QC Qualifier	Type	Comments
								MS	MSD						
191-24-2	33337 BENZO[G,H,I]PERYLENE	ND	2.3	2.4	2.4	10	ug/L	23	24	1-219	4.3	0-40	LFM		
207-06-9	33337 BENZO[K]FLUORANTHENE	ND	3.0	2.9	2.9	10	ug/L	30	29	11-162	3.4	0-40	LFM		
85-68-7	33337 BENZYL BUTYL PHTHALATE	ND	6.0	5.9	5.9	10	ug/L	60	59	1-152	1.7	0-40	LFM		
108-60-1	33337 BIS(2-CHLORO-1-METHYLETHYL)ETHANE	ND	5.5	5.3	5.3	10	ug/L	55	53	36-166	3.7	0-40	LFM		
111-91-1	33337 BIS(2-CHLOROETHOXY)METHANE	ND	5.9	6.0	6.0	10	ug/L	59	60	33-184	1.7	0-40	LFM		
111-44-4	33337 BIS(2-CHLOROETHYL)ETHER	ND	5.3	5.3	5.3	10	ug/L	53	53	12-158	0.0	0-40	LFM		
117-81-7	33337 Bis(2-ETHYLHEXYL)PHTHALATE	ND	1.5	1.5	1.5	10	ug/L	15	15	8-158	0.0	0-40	LFM		
218-01-9	33337 CHRYSENE	ND	4.9	4.7	4.7	10	ug/L	49	47	17-168	4.2	0-40	LFM		
192-65-4	33337 DIBENZO[A,E]PYRENE	ND	1.6	1.7	1.7	10	ug/L	16	17	1-154	6.1	0-40	LFM		
226-36-8	33337 DIBENZO[A,H]ACRIDINE	ND	4.4	4.4	4.4	10	ug/L	44	44	25-133	0.0	0-40	LFM		
189-64-0	33337 DIBENZO[A,H]PYRENE	ND	2.0	2.0	2.0	10	ug/L	20	20	4-160	0.0	0-40	LFM		
224-42-0	33337 DIBENZO[A,J]ACRIDINE	ND	4.3	4.4	4.4	10	ug/L	43	44	31-139	2.3	0-40	LFM		
53-70-3	33337 DIBENZO[A,H]ANTHRACENE	ND	2.4	2.5	2.5	10	ug/L	24	25	1-227	4.1	0-40	LFM		
84-66-2	33337 DIETHYL PHTHALATE	ND	5.8	5.7	5.7	10	ug/L	58	57	1-120	1.7	0-40	LFM		
131-11-3	33337 DIMETHYL PHTHALATE	ND	4.9	4.8	4.8	10	ug/L	49	48	1-120	2.1	0-40	LFM		
84-74-2	33337 Di-N-BUTYL PHTHALATE	ND	6.0	6.0	6.0	10	ug/L	60	60	1-120	0.0	0-40	LFM		
117-84-0	33337 Di-N-OCTYL PHTHALATE	ND	1.2	1.2	1.2	10	ug/L	12	12	4-146	0.0	0-40	LFM		
206-44-0	33337 FLUORANTHENE	ND	6.0	5.9	5.9	10	ug/L	60	59	26-137	1.7	0-40	LFM		
86-73-7	33337 FLUORENE	ND	6.0	6.1	6.1	10	ug/L	60	61	59-121	1.7	0-40	LFM		
118-74-1	33337 HEXACHLOROBENZENE	ND	5.5	5.5	5.5	10	ug/L	55	55	1-152	0.0	0-40	LFM		
87-68-3	33337 HEXACHLOROBUTADIENE	ND	4.1	4.2	4.2	10	ug/L	41	42	24-120	2.4	0-40	LFM		
77-47-4	33337 HEXACHLOROCYCLOPENTADIENE	ND	3.2	3.3	3.3	10	ug/L	32	33	1-142	3.1	0-40	LFM		
67-72-1	33337 HEXACHLOROETHANE	ND	4.6	4.6	4.6	10	ug/L	46	46	40-120	0.0	0-40	LFM		
193-39-5	33337 INDENO[1,2,3-C,D]PYRENE	ND	2.6	2.6	2.6	10	ug/L	26	26	1-171	0.0	0-40	LFM		
78-59-1	33337 ISOPHORONE	ND	6.1	6.1	6.1	10	ug/L	61	61	21-196	0.0	0-40	LFM		
91-20-3	33337 NAPHTHALENE	ND	5.3	5.4	5.4	10	ug/L	53	54	21-133	1.9	0-40	LFM		
98-95-3	33337 NITROBENZENE	ND	5.6	5.6	5.6	10	ug/L	56	56	35-180	0.0	0-40	LFM		
62-75-9	33337 N-NITROSODIMETHYLAMINE	ND	4.0	3.8	3.8	10	ug/L	40	38	19-109	5.1	0-40	LFM		
621-64-7	33337 N-NITROSODI-N-PROPYLAMINE	ND	6.1	5.9	5.9	10	ug/L	61	59	1-230	3.3	0-40	LFM		
86-30-6	33337 N-NITROSODIPHENYLAMINE	ND	6.6	6.5	6.5	10	ug/L	66	65	61-139	1.5	0-40	LFM		
59-50-7	33337 P-CHLORO-M-CRESOL	ND	6.8	6.7	6.7	10	ug/L	68	67	22-147	1.5	0-40	LFM		
87-86-5	33337 PENTACHLOROPHENOL	ND	7.6	7.5	7.5	10	ug/L	76	75	14-176	1.3	0-40	LFM		
198-55-0	33337 PERYLENE	ND	3.5	3.5	3.5	10	ug/L	35	35	18-114	0.0	0-40	LFM		
85-01-8	33337 PHENANTHRENE	ND	5.8	5.8	5.8	10	ug/L	58	58	54-120	0.0	0-40	LFM		

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NA = Indicates %RPD could not be calculated

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FORM: QC Dependent.rpt



Batch/CAS	Sample Analyte	Result	Spike Result	Spike Result	Spike Conc	Units	Percent Recovery		Limits*	%RPD	Limits*	QC Qualifier	Type	Comments
							MS	MSD						
108-95-2	33337 PHENOL	ND	3.0	2.9	10	ug/L	30	29	5-120	3.4	0-40		LFM	
129-00-0	33337 PYRENE	ND	6.0	5.9	10	ug/L	60	59	52-120	1.7	0-40		LFM	
<b>D7511_200609</b>														
57-12-5	33987 CYANIDE, TOTAL	ND	0.048	0.051	0.050	mg/L	96	102	70-130	6.1	0-0		LFM	

%RPD = Relative Percent Difference

NA = Indicates %RPD could not be calculated

Matrix Spike (MS)/Matrix Spike Duplicate (MSD) analyses are used to determine the accuracy (MS) and precision (MSD) of an analytical method in a given sample matrix. Therefore, the usefulness of this report is limited to samples of similar matrices analyzed in the same analytical batch.

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FORM: QC Dependent.rpt



## QUALITY CONTROL REPORT SURROGATE REPORT

Reference Number: 20-17415  
Report Date: 07/23/20

Lab No	Analyte	Result	Qualifier	Units	Method	Limit
608_200608 33337	DECACHLOROBIPHENYL (Surr)	110		%	608	
	TETRACHLORO-M-XYLENE (Surr)	87		%		
624_200608 33337	1,2 - DICHLOROETHANE-d4 (Surr)	96		%	624.1	Acceptance Limit 70-130%
	1,4 - DIFLUOROBENZENE-d4 (Surr)	100		%		Acceptance Limit 70-130%
	4-BROMOFLUOROBENZENE (Surr)	108		%		Acceptance Limit 70-130%
	d8-TOLUENE (Surr)	102		%		Acceptance Limit 70-130%
625_200608 33337	2,4,6 - TRIBROMOPHENOL (Surr)	63		%	625	
	2 - FLUOROBIPHENYL (Surr)	54		%		
	2 - FLUOROPHENOL (Surr)	35		%		
	d5-PHENOL (Surr)	27		%		
	p-TERPHENYL-d14 (Surr)	45		%		
	d5-NITROBENZENE (Surr)	53		%		

**\*Notation:**

A surrogate is a pure compound added to a sample in the laboratory just before processing so that the overall efficiency of a method can be determined.

The Acceptance Limits (or Control Limits) approximate a 99% confidence interval around the mean recovery.

## Qualifier Definitions

Reference Number: 20-17415

Report Date: 07/23/20

Qualifier	Definition
CV	The end calibration verification was significantly below the acceptance criterion of 80%. Low recovery is a result of this sample's high boiling material residue analyzed prior affecting chromatography. Data if reported, is suspect as biased low.
IEV	Acceptance criteria do not apply to estimated values
INH	The sample was non-homogeneous
J	The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.
L2	The associated blank spike recovery was below laboratory acceptance limits.
M2	Matrix spike recovery was low; the associated blank spike recovery was acceptable.
P	The Laboratory Fortified Blank was within limits. Little or No recovery of the MS/MSD indicates matrix effects. Detection at the reported amount may not have been achieved.

Note: Some qualifier definitions found on this page may pertain to results or QC data which are not printed with this report.

# Chain of Custody / Analysis Request

(Please complete all applicable shaded sections)



ANALYTICAL

**Main Lab (800-755-9295)**  
1620 South Walnut St. Burlington, WA 98233  
**Microbiology (888-725-1212)**  
805 W. Orchard Dr. Suite 4 Bellingham, WA 98225  
**Wilsonville Lab (503-682-7802)**  
9150 SW Pioneer Ct. Suite W Wilsonville, OR 97070  
**Corvallis Lab (541-753-4946)**  
1100 NE Circle Blvd, Ste 130, Corvallis, OR 97330  
**Bend Lab (541-639-8425)**  
20332 Empire Ave Ste F4, Bend, OR 97703

Report to: <b>ADAK IA, LLC</b>	Bill to: <b>ADA03</b>
Ship Address: <b>P.O. Box 669</b>	Address: <b>20-17415</b> 33337 - 33338
City: <b>Ferndale</b> St: <b>WA</b> Zip: <b>98248</b>	City: <b>20-17415</b>
Attn: <b>Dave B.</b>	Phone: <b>33337 - 33338</b>
Phone: <b>360.734-1112</b> FAX: <b></b>	Check Regulatory Program <input type="checkbox"/> Safe Drinking Water Act <input type="checkbox"/> Clean Water Act <input type="checkbox"/> RCRA / CERCLA <input type="checkbox"/> Other
Email: <b>daveatehs@aol.com, lisa@scrapitwa.com</b>	St: <b>WA</b> Zip: <b>98248</b>
Project: <b>Groundwater testing</b>	FAX: <b></b> Attn: <b></b>
	<input type="checkbox"/> Visa <input type="checkbox"/> M/C <input type="checkbox"/> A/E Expires <b>/</b>
	Card#: <b></b>

## Instructions

1. Use one line per sample Location.
2. Be specific in analysis requests.
3. **(NEW) List each metal individually (NEW)**
4. Check off analyses to be performed for each sample Location.
5. Enter number of containers.

**Turn Around Time Required**  
 Standard  
 Half-time (50% surcharge)  
 Quickest (100% surcharge) Phone Call Req.  
 Emergency (Phone Call Req.)

## Analyses Requested

Field ID	Location	Grab/Comp.	Sample Matrix*	Date	Time	Priority Pollutant List (App A 40CFR423)	Special Instructions	Number of Containers
1	Leachate Line	grab	WW	6/2/20	8:30	<input checked="" type="checkbox"/>		23
2	Leachate Line Sump				10:50 AM	<input type="checkbox"/>		
3						<input type="checkbox"/>		
4						<input type="checkbox"/>		
5						<input type="checkbox"/>		
6						<input type="checkbox"/>		
7						<input type="checkbox"/>		
8						<input type="checkbox"/>		
9						<input type="checkbox"/>	Includes 2 extra	
								23

\*\*Are there known hazardous or dangerous wastes in these samples? YES / NO If YES, indicate type on reverse of this form; samples may be returned to you.

Sampled by: **Dave & Bader** Phone: **360-739-3705** FAX:  Email: **Dave@ATEHSC@aol.com**

Sample Receipt Request (Must include FAX or Email)  \*W - water SW - surface water WW - waste water SL - salt water  
 DW - drinking water ST - storm water S - soil OL - oil Other:

**Relinquished by	Date	Time	Received by	Date	Time	Custody seals intact	Yes	No	N/A
<i>[Signature]</i>	6-2-20	12:50	<i>[Signature]</i>	6/2/20	1300	Sample temp	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
						Satisfactory	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
						Samples received intact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
						Chain of custody & labels agree	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Am Test Inc.  
13600 NE 126TH PL  
Suite C  
Kirkland, WA 98034  
(425) 885-1664  
www.amtestlab.com



Professional  
Analytical  
Services

## ANALYSIS REPORT

Edge Analytical  
1620 S. Walnut  
Burlington, WA 98233  
Attention: H Blunt  
Project Name: GROUNDWATER TESTING  
Project #: 20-17415  
PO Number: 20-17415  
All results reported on an as received basis.

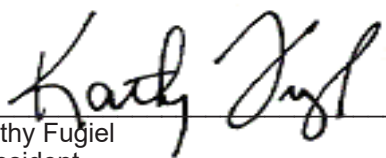
Date Received: 06/03/20  
Date Reported: 6/12/20

---

AMTEST Identification Number      20-A007537  
Client Identification                33337  
Sampling Date                         06/02/20, 08:30

### Conventionals

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE
Total Phenol	< 0.02	mg/L		0.02	EPA 420.4	AY	06/12/20

  
\_\_\_\_\_  
Kathy Fugiel  
President



# Anatek Labs, Inc.

1282 Alturas Drive - Moscow, ID 83843 - (208) 883-2839 - Fax (208) 8829246 - email moscow@anateklabs.com  
504 E Sprague Ste. D - Spokane, WA 99202 - (509) 838-3999 - fax (509) 838-4433 - email spokane@anateklabs.com

**Client:** Edge Analytical  
**Address:** 1620 S Walnut St.  
Burlington, WA 98233  
**Attn:** Edge Analytical

**Work Order:** MAF0103  
**Project:** Groundwater Testing  
**Reported:** 6/17/2020 12:30

## Analytical Results Report

**Sample Location:** 33337  
**Lab/Sample Number:** MAF0103-01      **Collect Date:** 06/02/20 08:30  
**Date Received:** 06/03/20 14:20      **Collected By:**  
**Matrix:** Wastewater

Analyte	Result	Units	MDL	PQL	Analyzed	Analyst	Method	Qualifier
<b>Mercury</b>								
Mercury	0.00102	ug/L	0.000200	0.000500	6/8/20 15:01	TEC	EPA 1631 E	

# Anatek Labs, Inc.

1282 Alturas Drive - Moscow, ID 83843 - (208) 883-2839 - Fax (208) 8829246 - email moscow@anateklabs.com  
504 E Sprague Ste. D - Spokane, WA 99202 - (509) 838-3999 - fax (509) 838-4433 - email spokane@anateklabs.com

## Analytical Results Report

(Continued)

Sample Location: 33338 Blank  
Lab/Sample Number: MAF0103-02 Collect Date: 06/02/20 08:30  
Date Received: 06/03/20 14:20 Collected By:  
Matrix: Wastewater

Analyte	Result	Units	MDL	PQL	Analyzed	Analyst	Method	Qualifier
<b>Mercury</b>								
Mercury	ND	ug/L	0.000200	0.000500	6/8/20 15:09	TEC	EPA 1631 E	U

Authorized Signature,



Justin Doty For Todd Taruscio, Laboratory Manager

U Compound was analyzed for but not detected  
PQL Practical Quantitation Limit  
ND Not Detected  
MDL Method Detection Limit  
Dry Sample results reported on a dry weight basis  
RPD Relative Percent Difference  
%REC Percent Recovery  
Source Sample that was spiked or duplicated.

This report shall not be reproduced except in full, without the written approval of the laboratory  
The results reported related only to the samples indicated.

# Anatek Labs, Inc.

1282 Alturas Drive - Moscow, ID 83843 - (208) 883-2839 - Fax (208) 8829246 - email moscow@anateklabs.com  
 504 E Sprague Ste. D - Spokane, WA 99202 - (509) 838-3999 - fax (509) 838-4433 - email spokane@anateklabs.com

## Quality Control Data

### Mercury

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
<b>Batch: BAF0273 - Hg Trace</b>										
<b>Blank (BAF0273-BLK1)</b>										
Mercury	ND	U	0.000500	ug/L						
					Prepared & Analyzed: 6/8/2020					
<b>LCS (BAF0273-BS1)</b>										
Mercury	0.00400		0.000500	ug/L	0.00500		79.9	77-123		
					Prepared & Analyzed: 6/8/2020					
<b>Matrix Spike (BAF0273-MS1)</b>										
Mercury	0.00415		0.000500	ug/L	0.00500	ND	83.0	71-125		
					Prepared & Analyzed: 6/8/2020					
<b>Matrix Spike Dup (BAF0273-MSD1)</b>										
Mercury	0.00412		0.000500	ug/L	0.00500	ND	82.5	71-125	0.677	24
					Prepared & Analyzed: 6/8/2020					



Burlington, WA	Corporate Laboratory (a)	1620 S Walnut St	Burlington, WA 98233	800.755.9295 • 360.7
Bellingham, WA	Microbiology (b)	805 Orchard Dr Ste 4	Bellingham, WA 98225	360.715.1212
Portland, OR	Microbiology/Chemistry (c)	9150 SW Pioneer Ct Ste W	Wilsonville, OR 97070	503.682.7802
Corvallis, OR	Microbiology (d)	640 SW Third Street	Corvallis, OR 97333	541.753.4946

MAF0103



Due: 06/23/20

# Subcontract Work Order

Laboratory Name: Anatek Lab, Inc  
 1282 Alturas Drive  
 Moscow, ID 83843  
 Project: Groundwater Testing

Date: 6/2/2020  
 Reference Number: 20-17415  
 Date Due: 6/23/2020

Lab Number: 33337	Sample Origin: WA	Matrix: Wastewater	Date Sampled: 6/2/2020	08:30
<b>Analyte Name</b>		<b>Units</b>	<b>PQL</b>	
<i>Analytical Method</i> 1631				
MERCURY - Clean		ug/L	0.0005	

Lab Number: 33338	Sample Origin: WA	Matrix: Wastewater	Date Sampled: 6/2/2020	08:30
<b>Analyte Name</b>		<b>Units</b>	<b>PQL</b>	
<i>Analytical Method</i> 1631				
MERCURY - clean		ng/L	0.5	

Please send results to: lab@edgeanalytical.com

*KUS*  
 Relinquished By \_\_\_\_\_  
 \_\_\_\_\_  
 Date                      Time

*HS*  
 Received By \_\_\_\_\_  
 \_\_\_\_\_  
 Date                      Time



Sample Receipt and Preservation Form

MAF0103
Barcode
Due: 06/23/20

Client Name: Edge Project: (apply Anatek sample label here)

TAT: Normal RUSH: days

Samples Received From: FedEx UPS USPS Client Courier Other:

Custody Seal on Cooler/Box: Yes No Custody Seals Intact: Yes No N/A

Number of Coolers/Boxes: 2 Type of Ice: Ice/Ice Packs Blue Ice Dry Ice None

Packing Material: Bubble Wrap Bags Foam/Peanuts None Other:

Cooler Temp As Read (°C): 5.4 Cooler Temp Corrected (°C): 5.6 Thermometer Used: IR-3

Table with 4 columns: Question, Yes, No, N/A. Rows include: Samples Received Intact?, Chain of Custody Present?, Samples Received Within Hold Time?, Samples Properly Preserved?, VOC Vials Free of Headspace (<6mm)?, VOC Trip Blanks Present?, Labels and Chains Agree?, Total Number of Sample Bottles Received: 2, Chain of Custody Fully Completed?, Correct Containers Received?, Anatek Bottles Used?

Record preservatives (and lot numbers, if known) for containers below:
Brc1(A 403-02) -> 1031

Notes, comments, etc. (also use this space if contacting the client - record names and date/time)

Received/Inspected By: [Signature] Date/Time: 6-3-20 1033

**EPA 100.2 - Asbestos in Drinking Water Final Report**

**Job Number:** 200588  
**Client:** Edge Analytical  
**Address:** 805 Orchard Dr  
 Suite 4  
 Bellingham, WA 98225  
**Project Name:** Groundwater Testing  
**Project No.:**  
**PO Number:**  
**PWS ID:**  
**Reference No.:** 20-17415

**Report Number:** 200588R01  
**Report Date:** 6/8/2020

Due to the turbidity of the sample the required 0.2MFL sensitivity is not achievable within the LabCor test parameters. If achieving the sensitivity is required, additional grid openings can be analyzed at an **Report Note:** additional cost. Please contact the lab for additional information.

Enclosed please find results for samples submitted to our laboratory. A list of samples and analyses follows:

Lab/Cor Sample #	Client Sample # and Description	Analysis	Analysis Notes	Date Received:
200588 - S1	33337 - Wastewater, WA Water ID#: 11923258	EPA 100.2 - Asbestos in Drinking Water		6/3/2020

EPA 100.2 - Asbestos in Drinking Water Preparation and analysis of the above samples was conducted by a NELAP accredited lab (Lab ID Number: 11747) in accordance with the EPA method #100.2. In this method, samples were taken from an affected water supply to measure the amount of asbestos contamination in the system. Any samples received 48 hours or more after collection were subjected to ozone/UV treatment.


Each sample was shaken, then sonicated briefly in a Health Sonics Ultrasonic Cleaner to distribute particulate evenly. Several aliquots were filtered onto 0.22 µm, 25 mm diameter mixed cellulose ester filters. Briefly, the samples were collapsed with a solution of N,N-dimethylformamide and acetic acid, then etched in a low temperature plasma etcher to remove the top surface of the filter and other organics. The samples were coated at high vacuum with a thin layer of carbon, placed on 200 mesh copper grids and allowed to dissolve in N,N-Dimethylformamide / Acetone baths until cleared of filter debris.

Each aliquot was examined at low magnification to determine the best particulate loading for analysis. Any samples requiring an aliquot <1ml were resuspended in a new 1L solution to ensure even loading and proper sampling technique. Analysis was performed using a transmission electron microscope equipped with an EDS X ray analyzer. The samples were analyzed at an approximate screen magnification of 10,000x, with an accelerating voltage of 100 KV, analyzing for structures >10µm in length. The sizing of grid openings was performed using a calibrated digital imaging system at low magnification.

**Disclaimer** The results reported relate only to the samples tested or analyzed; the laboratory is not responsible for data collected by personnel who are not affiliated with the laboratory. Results reported in both structures/cm3 and structures/mm2 are dependent on the sample volume and area. These parameters are measured and recorded by non-laboratory personnel and are not covered by the laboratory's accreditation. Interpretation of these results is the sole responsibility of the client.

If further clarification of these results is needed, please call us. Thank you for allowing the staff at Lab/Cor, Inc. the opportunity to provide you with the analytical services.

Sincerely,



**Sierra Hinkle**  
 Technician/Analyst

**EPA 100.2 - Asbestos in Drinking Water Summary Data -  
 Final Report**

Job Number: 200588      SEA

Client: Edge Analytical

Report Number: 200588R01

Project Name: Groundwater Testing

Date Received: 6/3/2020

Lab/Cor Sample No.: S1

Sample Area/Mass/Volume (ml) : 800

Client Sample No.: 33337

Lab Filter Area (mm2) : 201

Description: Wastewater, WA Water ID#: 11923258

Grid Openings Analyzed : 20

Filter Fraction: 1

Aliquot Dilution: 1

Average Grid Opening Area : 0.0108

Begin Volume: 1 ml

Final Dilution: 1

Area Analyzed (mm2) : 0.216

Volume Taken: 1 ml

Analytical Sens. (struc/MFL>10-um) : 0.931

Detection Limit. (struc/MFL>10-um) : 2.782

Analyst(s)	Analysis Date	Microscope	Magnification
SH	6/8/2020	Hitachi 7000FA	10000

Structure Type	Concentration MFL>10-um	95% Confidence Interval MFL>10-um	Structure Count <sup>1</sup> Prim/Total
TEM Water Amphibole	< 0.931	0 - 3.433 - Poisson	0
TEM Water Chrysotile	< 0.931	0 - 3.433 - Poisson	0
TEM Water Total	< 0.931	0 - 3.433 - Poisson	0

**Reviewed by:**

*Sierra Hinkle*  
 Sierra Hinkle  
 Technician/Analyst

\* One-sided upper 95% Poisson confidence limits may be used to calculate sample concentrations ([Struc count] \* [Analytical Sensitivity]) when the structure count is below 4. The limits are: 0 str - 0, 1 str - 1, 2 str - 2, 3 str - 3

**EPA 100.2 - Asbestos in Drinking Water Raw Data -  
 Final Report**

Job Number: 200588      SEA

EPA 100.2

Client: Edge Analytical

Report Number: 200588R01

Project Name: Groundwater Testing

Date Received: 6/3/2020

Project No.:

Lab/Cor Sample No: S1

Client Sample No: 33337

Description: Wastewater, WA Water ID#: 11923258

Gr	No.	Loc.	ID	Prim Tot	Class	Length	Width	Aspect	Analyte	Elements	Comment	Count Categories
G5	1	C43			NSD							
G5	2	C44			NSD							
G5	3	E43			NSD							
G5	4	E44			NSD							
G5	5	F43			NSD							
G5	6	F44			NSD							
G5	7	G43			NSD							
G5	8	G44			NSD							
G5	9	H43			NSD							
G5	10	H44			NSD							
G5	11	K43			NSD							
G6	12	C41			NSD							
G6	13	C42			NSD							
G6	14	E41			NSD							
G6	15	E42			NSD							
G6	16	F41			NSD							
G7	17	C43			NSD							
G7	18	C44			NSD							
G7	19	E43			NSD							
G7	20	E44			NSD							

Count Categories					
Water_Amph	TEM Water Amphibole	WATER_Chrys	TEM Water Chrysotile	WATER_Total	TEM Water Total

**Reviewed by:**

*Sierra Hinkle*  
 Sierra Hinkle  
 Technician/Analyst



**Report Prepared for:**

Client Services  
Edge Analytical  
1620 S. Walnut Street  
Burlington WA 98233

**REPORT OF  
LABORATORY  
ANALYSIS FOR  
TCDD**

**Report Prepared Date:**

June 8, 2020

**Report Information:**

**Pace Project #: 10520157**  
**Sample Receipt Date: 06/03/2020**  
**Client Project #: 20-17415**  
**Client Sub PO #: N/A**  
**State Cert #: C486**

**Invoicing & Reporting Options:**

The report provided has been invoiced as a Level 2 2,3,7,8-TCDD Report. If an upgrade of this report package is requested, an additional charge may be applied.

Please review the attached invoice for accuracy and forward any questions to Kirsten Hogberg, your Pace Project Manager.

**This report has been reviewed by:**



June 09, 2020

Kirsten Hogberg, Project Manager  
(612) 607-6407  
(612) 607-6444 (fax)  
kirsten.hogberg@pacelabs.com



**Report of Laboratory Analysis**

This report should not be reproduced, except in full, without the written consent of Pace Analytical Services, Inc.

The results relate only to the samples included in this report.

## **DISCUSSION**

This report presents the results from the analysis performed on one sample submitted by a representative of Edge Analytical. The sample was analyzed for the presence or absence of 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD) using USEPA Method 1613B. Per request, the reporting limits were set to 5 pg/L.

The isotopically-labeled TCDD internal standard in the sample extract was recovered at 108%. All of the labeled standard recoveries obtained for this project were within the target ranges specified in Method 1613B. Also, since the quantification of the native TCDD was based on isotope dilution, the data were automatically corrected for recovery and accurate values were obtained.

A laboratory method blank was prepared and analyzed with the sample batch as part of our routine quality control procedures. The results show the blank to be free of 2,3,7,8-TCDD at the reporting limit.

Laboratory spike samples were also prepared using clean reference matrix that had been fortified with native standard material. The results show that the spiked native TCDD was recovered at 95-106% with a relative percent difference of 10.9%. These results were within the target ranges for the method. Matrix spikes were not prepared with the sample batch.

## **REPORT OF LABORATORY ANALYSIS**

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## Minnesota Laboratory Certifications

Authority	Certificate #	Authority	Certificate #
A2LA	2926.01	Minnesota - Pet	1240
Alabama	40770	Mississippi	MN00064
Alaska - DW	MN00064	Missouri - DW	10100
Alaska - UST	17-009	Montana	CERT0092
Arizona	AZ0014	Nebraska	NE-OS-18-06
Arkansas - DW	MN00064	Nevada	MN00064
Arkansas - WW	88-0680	New Hampshire	2081
CNMI Saipan	MP0003	New Jersey (NE)	MN002
California	2929	New York	11647
Colorado	MN00064	North Carolina -	27700
Connecticut	PH-0256	North Carolina -	530
EPA Region 8+	via MN 027-053	North Dakota	R-036
Florida (NELAP)	E87605	Ohio - DW	41244
Georgia	959	Ohio - VAP	CL101
Guam	20-00.R	Oklahoma	9507
Hawaii	MN00064	Oregon - Primar	MN300001
Idaho	MN00064	Oregon - Secon	MN200001
Illinois	200011	Pennsylvania	68-00563
Indiana	C-MN-01	Puerto Rico	MN00064
Iowa	368	South Carolina	74003
Kansas	E-10167	Tennessee	TN02818
Kentucky - DW	90062	Texas	T104704192
Kentucky - WW	90062	Utah (NELAP)	MN00064
Louisiana - DE	84596	Vermont	VT-027053137
Louisiana - DW	MN00064	Virginia	460163
Maine	MN00064	Washington	C486
Maryland	322	West Virginia -	382
Massachusetts	M-MN064	West Virginia -	9952C
Michigan	9909	Wisconsin	999407970
Minnesota	027-053-137	Wyoming - UST	2926.01
Minnesota - De	via MN 027-053		

## REPORT OF LABORATORY ANALYSIS

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Report No.....10520157

# Appendix A

## Sample Management



Burlington, WA	Corporate Laboratory (a)	1620 S Walnut St	Burlington, WA 98233	800.755.9295 • 360.757.1400
Bellingham, WA	Microbiology (b)	805 Orchard Dr Ste 4	Bellingham, WA 98225	360.715.1212
Portland, OR	Microbiology/Chemistry (c)	9150 SW Pioneer Ct Ste W	Wilsonville, OR 97070	503.682.7802
Corvallis, OR	Microbiology (d)	540 SW Third Street	Corvallis, OR 97333	541.753.4946

# Subcontract Work Order

Laboratory Name: Pace Analytical Services, Inc.  
 1700 Elm Street  
 Minneapolis, MN 55414  
 Project: Groundwater Testing

Date: 6/2/2020  
 Reference Number: 20-17415  
 Date Due: 6/23/2020

Lab Number: 33337	Sample Origin: WA	Matrix: Wastewater	Date Sampled: 6/2/2020	08:30
<b>Analyte Name</b>		<b>Units</b>	<b>PQL</b>	<i>oel</i>
<i>Analytical Method</i> 1613				
2,3,7,8-TCDD(DIOXIN)		pg/L	5	

WO#: 10520157



Please send results to: lab@edgeanalytical.com

*Kus*  
 Relinquished By \_\_\_\_\_  
 Date 6/2/20 Time \_\_\_\_\_

*Trustspace*  
 Received By \_\_\_\_\_  
 Date 6/2/20 Time 950 T = 4-5°C  
6/3/20  
6/3/20



Document Name:  
**Sample Condition Upon Receipt (SCUR) - MN**

Document No.:  
**ENV-FRM-MIN4-0150 Rev.00**

Document Revised: 27Mar2020  
**Page 1 of 1**

Pace Analytical Services -  
**Minneapolis**

**Sample Condition Upon Receipt**

Client Name:

EDGE

Project #:

**WO# : 10520157**

Due Date: 06/17/20

PM: KNH

CLIENT: Edge

Courier:  Fed Ex  UPS  USPS  Client  
 Pace  SpeedDee  Commercial  See Exceptions

Tracking Number: 1Z 741 W47 01 7287 4527

Custody Seal on Cooler/Box Present?  Yes  No Seals Intact?  Yes  No Biological Tissue Frozen?  Yes  No  N/A

Packing Material:  Bubble Wrap  Bubble Bags  None  Other: \_\_\_\_\_ Temp Blank?  Yes  No

Thermometer:  T1(0461)  T2(1336)  T3(0459)  T4(0254)  T5(0489) Type of Ice:  Wet  Blue  None  Dry  Melted

Did Samples Originate in West Virginia? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Were All Container Temps Taken? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Temp should be above freezing to 6°C	Cooler Temp Read w/temp blank: _____ °C
Correction Factor: <u>±0.1</u>	Cooler Temp Corrected w/temp blank: _____ °C
	Average Corrected Temp (no temp blank only): <input checked="" type="checkbox"/> See Exceptions <input type="checkbox"/> 1 Container
	<u>4.5</u> °C

USDA Regulated Soil: (  N/A, water sample/Other: \_\_\_\_\_ )

Date/Initials of Person Examining Contents: GNZ 6/13/20

Did samples originate in a quarantine zone within the United States: AL, AR, CA, FL, GA, ID, LA, MS, NC, NM, NY, OK, OR, SC, TN, TX or VA (check maps)?  Yes  No

Did samples originate from a foreign source (internationally, including Hawaii and Puerto Rico)?  Yes  No

If Yes to either question, fill out a Regulated Soil Checklist (F-MN-Q-338) and include with SCUR/COC paperwork.

	COMMENTS:
Chain of Custody Present and Filled Out? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	1.
Chain of Custody Relinquished? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2.
Sampler Name and/or Signature on COC? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	3.
Samples Arrived within Hold Time? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	4.
Short Hold Time Analysis (<72 hr)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	5. <input type="checkbox"/> Fecal Coliform <input type="checkbox"/> HPC <input type="checkbox"/> Total Coliform/E coli <input type="checkbox"/> BOD/cBOD <input type="checkbox"/> Hex Chrome <input type="checkbox"/> Turbidity <input type="checkbox"/> Nitrate <input type="checkbox"/> Nitrite <input type="checkbox"/> Orthophos <input type="checkbox"/> Other
Rush Turn Around Time Requested? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6.
Sufficient Volume? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7.
Correct Containers Used? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	8.
-Pace Containers Used? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Containers Intact? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	9.
Field Filtered Volume Received for Dissolved Tests? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	10. Is sediment visible in the dissolved container? <input type="checkbox"/> Yes <input type="checkbox"/> No
Is sufficient information available to reconcile the samples to the COC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	11. If no, write ID/ Date/Time on Container Below: <input type="checkbox"/> See Exception
Matrix: <input checked="" type="checkbox"/> Water <input type="checkbox"/> Soil <input type="checkbox"/> Oil <input type="checkbox"/> Other	
All containers needing acid/base preservation have been checked? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	12. Sample #
All containers needing preservation are found to be in compliance with EPA recommendation? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> NaOH <input type="checkbox"/> HNO <sub>3</sub> <input type="checkbox"/> H <sub>2</sub> SO <sub>4</sub> <input type="checkbox"/> Zinc Acetate
Exceptions: VOA, Coliform, TOC/DOC Oil and Grease, DRO/8015 (water) and <u>Dioxin</u> /PFAS <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Positive for Res. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Chlorine? <input type="checkbox"/> No <input type="checkbox"/> See Exception
	pH Paper Lot# <input type="checkbox"/>
	Res. Chlorine <input type="checkbox"/> 0-6 Roll <input type="checkbox"/> 0-6 Strip <input type="checkbox"/> 0-14 Strip
Extra labels present on soil VOA or WIDRO containers? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	13. <input type="checkbox"/> See Exception
Headspace in VOA Vials (greater than 6mm)? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/>
Trip Blank Present? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Trip Blank Custody Seals Present? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Pace Trip Blank Lot # (if purchased): _____

**CLIENT NOTIFICATION/RESOLUTION**

Person Contacted: \_\_\_\_\_  
Comments/Resolution: \_\_\_\_\_

Field Data Required?  Yes  No

Date/Time: \_\_\_\_\_

Project Manager Review: Kirsten Hooper

Date: 6/3/2020

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office ( i.e. out of hold, incorrect preservative, out of temp, incorrect containers).



## Reporting Flags

- A = Reporting Limit based on signal to noise
- B = Less than 10x higher than method blank level
- C = Result obtained from confirmation analysis
- D = Result obtained from analysis of diluted sample
- E = Exceeds calibration range
- I = Interference present
- J = Estimated value
- L = Suppressive interference, analyte may be biased low
- Nn = Value obtained from additional analysis
- P = PCDE Interference
- R = Recovery outside target range
- S = Peak saturated
- U = Analyte not detected
- V = Result verified by confirmation analysis
- X = %D Exceeds limits
- Y = Calculated using average of daily RFs
- \* = See Discussion

### REPORT OF LABORATORY ANALYSIS

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Report No.....10520157



## **Appendix B**

### Sample Analysis Summary



### Method 1613B Sample Analysis Results

Client - Edge Analytical

Client's Sample ID	33337		
Lab Sample ID	10520157001		
Filename	F200607A_10		
Injected By	BAL		
Total Amount Extracted	969 mL	Matrix	Water
% Moisture	NA	Dilution	NA
Dry Weight Extracted	NA	Collected	06/02/2020
ICAL ID	F200601	Received	06/03/2020 09:50
CCal Filename(s)	F200606B_16	Extracted	06/04/2020 12:05
Method Blank ID	BLANK-79881	Analyzed	06/07/2020 19:36

Native Isomers	Conc pg/L	EMPC pg/L	RL pg/L	Internal Standards	ng's Added	Percent Recovery
2,3,7,8-TCDD	ND	---	5.0	2,3,7,8-TCDD-13C	2.00	108
				Recovery Standard 1,2,3,4-TCDD-13C	2.00	NA
				Cleanup Standard 2,3,7,8-TCDD-37Cl4	0.20	100

Conc = Concentration (Totals include 2,3,7,8-substituted isomers).  
 EMPC = Estimated Maximum Possible Concentration  
 RL = Reporting Limit

ND = Not Detected  
 NA = Not Applicable  
 NC = Not Calculated

R = Recovery outside target range  
 E = Exceeds calibration range

## REPORT OF LABORATORY ANALYSIS

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### Method 1613B Blank Analysis Results

Lab Sample Name	DFBLKAR	Matrix	Water
Lab Sample ID	BLANK-79881	Dilution	NA
Filename	F200606A_04	Extracted	06/04/2020 12:05
Total Amount Extracted	1050 mL	Analyzed	06/06/2020 14:49
ICAL ID	F200601	Injected By	BAL
CCal Filename(s)	F200605B_16		

Native Isomers	Conc pg/L	EMPC pg/L	RL pg/L	Internal Standards	ng's Added	Percent Recovery
2,3,7,8-TCDD	ND	---	5.0	2,3,7,8-TCDD-13C	2.00	102
				Recovery Standard 1,2,3,4-TCDD-13C	2.00	NA
				Cleanup Standard 2,3,7,8-TCDD-37Cl4	0.20	114

Conc = Concentration (Totals include 2,3,7,8-substituted isomers).  
 EMPC = Estimated Maximum Possible Concentration  
 RL = Reporting Limit

## REPORT OF LABORATORY ANALYSIS

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### Method 1613B Laboratory Control Spike Results

Lab Sample ID	LCS-79882	Matrix	Water
Filename	F200606A_01	Dilution	NA
Total Amount Extracted	1060 mL	Extracted	06/04/2020 12:05
ICAL ID	F200601	Analyzed	06/06/2020 12:35
CCal Filename	F200605B_16	Injected By	BAL
Method Blank ID	BLANK-79881		

Compound	Cs	Cr	Lower Limit	Upper Limit	% Rec.
2,3,7,8-TCDD	10	9.5	7.3	14.6	95
2,3,7,8-TCDD-37Cl4	10	8.5	3.7	15.8	85
2,3,7,8-TCDD-13C	100	88	25.0	141.0	88

Cs = Concentration Spiked (ng/mL)  
 Cr = Concentration Recovered (ng/mL)  
 Rec. = Recovery (Expressed as Percent)  
 Control Limit Reference: Method 1613, Table 6, 10/94 Revision  
 R = Recovery outside of control limits  
 Nn = Value obtained from additional analysis  
 \* = See Discussion

## REPORT OF LABORATORY ANALYSIS

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### Method 1613B Laboratory Control Spike Results

Lab Sample ID	LCSD-79883	Matrix	Water
Filename	F200606A_02	Dilution	NA
Total Amount Extracted	1050 mL	Extracted	06/04/2020 12:05
ICAL ID	F200601	Analyzed	06/06/2020 13:19
CCal Filename	F200605B_16	Injected By	BAL
Method Blank ID	BLANK-79881		

Compound	Cs	Cr	Lower Limit	Upper Limit	% Rec.
2,3,7,8-TCDD	10	11	7.3	14.6	106
2,3,7,8-TCDD-37Cl4	10	9.0	3.7	15.8	90
2,3,7,8-TCDD-13C	100	92	25.0	141.0	92

Cs = Concentration Spiked (ng/mL)  
 Cr = Concentration Recovered (ng/mL)  
 Rec. = Recovery (Expressed as Percent)  
 Control Limit Reference: Method 1613, Table 6, 10/94 Revision  
 R = Recovery outside of control limits  
 Nn = Value obtained from additional analysis  
 \* = See Discussion

## REPORT OF LABORATORY ANALYSIS

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**Method 1613B**

**Spike Recovery Relative Percent Difference (RPD) Results**

Client Edge Analytical

Spike 1 ID LCS-79882  
 Spike 1 Filename F200606A\_01

Spike 2 ID LCSD-79883  
 Spike 2 Filename F200606A\_02

Compound	Spike 1 %REC	Spike 2 %REC	%RPD
2,3,7,8-TCDD	95	106	10.9

%REC = Percent Recovered

RPD = The difference between the two values divided by the mean value

**REPORT OF LABORATORY ANALYSIS**

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# Appendix A

## Sample Management



Burlington, WA	Corporate Laboratory (a)	1620 S Walnut St	Burlington, WA 98233	800.755.9295 • 360.757.1400
Bellingham, WA	Microbiology (b)	805 Orchard Dr Ste 4	Bellingham, WA 98225	360.715.1212
Portland, OR	Microbiology/Chemistry (c)	9150 SW Pioneer Ct Ste W	Wilsonville, OR 97070	503.682.7802
Corvallis, OR	Microbiology (d)	540 SW Third Street	Corvallis, OR 97333	541.753.4946

# Subcontract Work Order

Laboratory Name: Pace Analytical Services, Inc.  
 1700 Elm Street  
 Minneapolis, MN 55414  
 Project: Groundwater Testing

Date: 6/2/2020  
 Reference Number: 20-17415  
 Date Due: 6/23/2020

Lab Number: 33337	Sample Origin: WA	Matrix: Wastewater	Date Sampled: 6/2/2020	08:30
Analyte Name	Units	PQL		<i>oel</i>
Analytical Method 1613 2,3,7,8-TCDD(DIOXIN)	pg/L	5		

**WO# : 10520157**

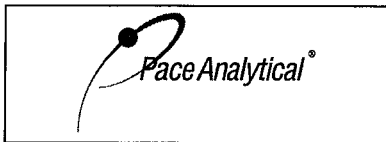


Please send results to: lab@edgeanalytical.com

*Kus*  
 Relinquished By \_\_\_\_\_  
 Date 6/2/20 Time \_\_\_\_\_

*Trustspace*  
 Received By \_\_\_\_\_  
 Date 6/2/20 Time 9:50 T = 4-5°C  
6/7/20





Document Name:  
**Sample Condition Upon Receipt (SCUR) - MN**

Document No.:  
**ENV-FRM-MIN4-0150 Rev.00**

Document Revised: 27Mar2020  
**Page 1 of 1**

Pace Analytical Services -  
**Minneapolis**

**Sample Condition Upon Receipt**

Client Name:

EDGE

Project #:

**WO# : 10520157**

Due Date: 06/17/20

PM: KNH

CLIENT: Edge

Courier:  Fed Ex  UPS  USPS  Client  
 Pace  SpeedDee  Commercial  See Exceptions

Tracking Number: 1Z 741 W47 01 7287 4527

Custody Seal on Cooler/Box Present?  Yes  No Seals Intact?  Yes  No Biological Tissue Frozen?  Yes  No  N/A

Packing Material:  Bubble Wrap  Bubble Bags  None  Other: \_\_\_\_\_ Temp Blank?  Yes  No

Thermometer:  T1(0461)  T2(1336)  T3(0459)  T4(0254)  T5(0489) Type of Ice:  Wet  Blue  None  Dry  Melted

Did Samples Originate in West Virginia? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Were All Container Temps Taken? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Temp should be above freezing to 6°C	Cooler Temp Read w/temp blank: _____ °C
Correction Factor: <u>±0.1</u>	Cooler Temp Corrected w/temp blank: _____ °C
Average Corrected Temp (no temp blank only): <input checked="" type="checkbox"/> See Exceptions <input type="checkbox"/> 1 Container	
Average Corrected Temp: <u>4.5</u> °C	

USDA Regulated Soil: (  N/A, water sample/Other: \_\_\_\_\_ )

Date/Initials of Person Examining Contents: GNZ 6/13/20

Did samples originate in a quarantine zone within the United States: AL, AR, CA, FL, GA, ID, LA, MS, NC, NM, NY, OK, OR, SC, TN, TX or VA (check maps)?  Yes  No

Did samples originate from a foreign source (internationally, including Hawaii and Puerto Rico)?  Yes  No

If Yes to either question, fill out a Regulated Soil Checklist (F-MN-Q-338) and include with SCUR/COC paperwork.

	COMMENTS:
Chain of Custody Present and Filled Out? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	1.
Chain of Custody Relinquished? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2.
Sampler Name and/or Signature on COC? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	3.
Samples Arrived within Hold Time? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	4.
Short Hold Time Analysis (<72 hr)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	5. <input type="checkbox"/> Fecal Coliform <input type="checkbox"/> HPC <input type="checkbox"/> Total Coliform/E coli <input type="checkbox"/> BOD/cBOD <input type="checkbox"/> Hex Chrome <input type="checkbox"/> Turbidity <input type="checkbox"/> Nitrate <input type="checkbox"/> Nitrite <input type="checkbox"/> Orthophos <input type="checkbox"/> Other
Rush Turn Around Time Requested? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6.
Sufficient Volume? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7.
Correct Containers Used? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	8.
-Pace Containers Used? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Containers Intact? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	9.
Field Filtered Volume Received for Dissolved Tests? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	10. Is sediment visible in the dissolved container? <input type="checkbox"/> Yes <input type="checkbox"/> No
Is sufficient information available to reconcile the samples to the COC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	11. If no, write ID/ Date/Time on Container Below: <input type="checkbox"/> See Exception
Matrix: <input checked="" type="checkbox"/> Water <input type="checkbox"/> Soil <input type="checkbox"/> Oil <input type="checkbox"/> Other	
All containers needing acid/base preservation have been checked? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	12. Sample #
All containers needing preservation are found to be in compliance with EPA recommendation? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> NaOH <input type="checkbox"/> HNO <sub>3</sub> <input type="checkbox"/> H <sub>2</sub> SO <sub>4</sub> <input type="checkbox"/> Zinc Acetate
Exceptions: VOA, Coliform, TOC/DOC Oil and Grease, DRO/8015 (water) and <u>Dioxin</u> /PFAS <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Positive for Res. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Chlorine? <input type="checkbox"/> No <input type="checkbox"/> See Exception
	pH Paper Lot# <input type="checkbox"/>
	Res. Chlorine <input type="checkbox"/> 0-6 Roll <input type="checkbox"/> 0-6 Strip <input type="checkbox"/> 0-14 Strip
Extra labels present on soil VOA or WIDRO containers? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	13. <input type="checkbox"/> See Exception
Headspace in VOA Vials (greater than 6mm)? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/>
Trip Blank Present? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Trip Blank Custody Seals Present? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Pace Trip Blank Lot # (if purchased): _____

**CLIENT NOTIFICATION/RESOLUTION**

Person Contacted: \_\_\_\_\_  
Comments/Resolution: \_\_\_\_\_

Field Data Required?  Yes  No

Date/Time: \_\_\_\_\_

Project Manager Review: Kirsten Hojberg

Date: 6/3/2020

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office ( i.e. out of hold, incorrect preservative, out of temp, incorrect containers).



Document Name:  
**Sample Condition Upon Receipt (SCUR)  
 Exception Form**

Document Revised: 26Mar2020  
 Page 1 of 1

Document No.:  
**ENV-FRM-MIN4-0142 Rev.00**

Pace Analytical Services -  
**Minneapolis**

**SCUR Exceptions:**

**Workorder #:**

Out of Temp Sample IDs	Container Type	# of Containers	PM Notified? <input type="checkbox"/> Yes <input type="checkbox"/> No																	
			If yes, indicate who was contacted/date/time. If no, indicate reason why.																	
			Multiple Cooler Project? <input type="checkbox"/> Yes <input type="checkbox"/> No If you answered yes, fill out information to the left.																	
			<table border="1"> <thead> <tr> <th colspan="3">No Temp Blank</th> </tr> <tr> <th>Read Temp</th> <th>Corrected Temp</th> <th>Average Temp</th> </tr> </thead> <tbody> <tr> <td>3.8</td> <td>3.9</td> <td rowspan="5">4.5</td> </tr> <tr> <td>4.9</td> <td>5.0</td> </tr> <tr> <td>3.9</td> <td>4.0</td> </tr> <tr> <td>5.1</td> <td>5.2</td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>	No Temp Blank			Read Temp	Corrected Temp	Average Temp	3.8	3.9	4.5	4.9	5.0	3.9	4.0	5.1	5.2		
No Temp Blank																				
Read Temp	Corrected Temp	Average Temp																		
3.8	3.9	4.5																		
4.9	5.0																			
3.9	4.0																			
5.1	5.2																			

Tracking Number/Temperature

Other Issues		
Issue Type:	Container Type	# of Containers
Sample ID		

**pH Adjustment Log for Preserved Samples**

Sample ID	Type of Preserv.	pH Upon Receipt	Date Adjusted	Time Adjusted	Amount Added (mL)	Lot # Added	pH After	In Compliance after addition? <input type="checkbox"/> Yes <input type="checkbox"/> No	Initials
								<input type="checkbox"/> Yes <input type="checkbox"/> No	
								<input type="checkbox"/> Yes <input type="checkbox"/> No	
								<input type="checkbox"/> Yes <input type="checkbox"/> No	
								<input type="checkbox"/> Yes <input type="checkbox"/> No	

## Reporting Flags

- A = Reporting Limit based on signal to noise
- B = Less than 10x higher than method blank level
- C = Result obtained from confirmation analysis
- D = Result obtained from analysis of diluted sample
- E = Exceeds calibration range
- I = Interference present
- J = Estimated value
- L = Suppressive interference, analyte may be biased low
- Nn = Value obtained from additional analysis
- P = PCDE Interference
- R = Recovery outside target range
- S = Peak saturated
- U = Analyte not detected
- V = Result verified by confirmation analysis
- X = %D Exceeds limits
- Y = Calculated using average of daily RFs
- \* = See Discussion

### REPORT OF LABORATORY ANALYSIS

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Report No.....10520157

# Appendix A

## Sample Management



Burlington, WA	Corporate Laboratory (a)	1620 S Walnut St	Burlington, WA 98233	800.755.9295 • 360.757.1400
Bellingham, WA	Microbiology (b)	805 Orchard Dr Ste 4	Bellingham, WA 98225	360.715.1212
Portland, OR	Microbiology/Chemistry (c)	9150 SW Pioneer Ct Ste W	Wilsonville, OR 97070	503.682.7802
Corvallis, OR	Microbiology (d)	540 SW Third Street	Corvallis, OR 97333	541.753.4946

# Subcontract Work Order

Laboratory Name: Pace Analytical Services, Inc.  
 1700 Elm Street  
 Minneapolis, MN 55414  
 Project: Groundwater Testing

Date: 6/2/2020  
 Reference Number: 20-17415  
 Date Due: 6/23/2020

Lab Number: 33337	Sample Origin: WA	Matrix: Wastewater	Date Sampled: 6/2/2020	08:30
Analyte Name	Units	PQL	oel	
Analytical Method 1613 2,3,7,8-TCDD(DIOXIN)	pg/L	5		

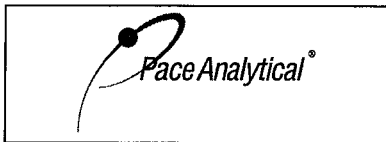
## WO#: 10520157



Please send results to: lab@edgeanalytical.com

Kus  
 Relinquished By  
6/2/20  
 Date Time

Trustspace  
 Received By  
6/2/20 950 T= 4-5°C  
 Date 6/3/20 Time  
 6/7/20



Document Name:  
**Sample Condition Upon Receipt (SCUR) - MN**

Document No.:  
**ENV-FRM-MIN4-0150 Rev.00**

Document Revised: 27Mar2020  
**Page 1 of 1**

Pace Analytical Services -  
**Minneapolis**

**Sample Condition Upon Receipt**

Client Name:

EDGE

Project #:

**WO# : 10520157**

Due Date: 06/17/20

Courier:  Fed Ex  UPS  USPS  Client  
 Pace  SpeedDee  Commercial  See Exceptions

PM: KNH  
CLIENT: Edge

Tracking Number: 1Z 741 W47 01 7287 4527

Custody Seal on Cooler/Box Present?  Yes  No      Seals Intact?  Yes  No      Biological Tissue Frozen?  Yes  No  N/A

Packing Material:  Bubble Wrap  Bubble Bags  None  Other: \_\_\_\_\_      Temp Blank?  Yes  No

Thermometer:  T1(0461)  T2(1336)  T3(0459)  T4(0254)  T5(0489)      Type of Ice:  Wet  Blue  None  Dry  Melted

Did Samples Originate in West Virginia? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Were All Container Temps Taken? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Temp should be above freezing to 6°C      Cooler Temp Read w/temp blank: _____ °C	Average Corrected Temp (no temp blank only): <input checked="" type="checkbox"/> See Exceptions
Correction Factor: <u>±0.1</u> Cooler Temp Corrected w/temp blank: _____ °C	<u>4.5</u> °C <input type="checkbox"/> 1 Container

USDA Regulated Soil: (  N/A, water sample/Other: \_\_\_\_\_ )

Date/Initials of Person Examining Contents: GNZ 6/13/20

Did samples originate in a quarantine zone within the United States: AL, AR, CA, FL, GA, ID, LA, MS, NC, NM, NY, OK, OR, SC, TN, TX or VA (check maps)?  Yes  No

Did samples originate from a foreign source (internationally, including Hawaii and Puerto Rico)?  Yes  No

If Yes to either question, fill out a Regulated Soil Checklist (F-MN-Q-338) and include with SCUR/COC paperwork.

	COMMENTS:
Chain of Custody Present and Filled Out? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	1.
Chain of Custody Relinquished? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2.
Sampler Name and/or Signature on COC? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	3.
Samples Arrived within Hold Time? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	4.
Short Hold Time Analysis (<72 hr)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	5. <input type="checkbox"/> Fecal Coliform <input type="checkbox"/> HPC <input type="checkbox"/> Total Coliform/E coli <input type="checkbox"/> BOD/cBOD <input type="checkbox"/> Hex Chrome <input type="checkbox"/> Turbidity <input type="checkbox"/> Nitrate <input type="checkbox"/> Nitrite <input type="checkbox"/> Orthophos <input type="checkbox"/> Other
Rush Turn Around Time Requested? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6.
Sufficient Volume? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7.
Correct Containers Used? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	8.
-Pace Containers Used? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Containers Intact? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	9.
Field Filtered Volume Received for Dissolved Tests? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	10. Is sediment visible in the dissolved container? <input type="checkbox"/> Yes <input type="checkbox"/> No
Is sufficient information available to reconcile the samples to the COC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	11. If no, write ID/ Date/Time on Container Below: <input type="checkbox"/> See Exception
Matrix: <input checked="" type="checkbox"/> Water <input type="checkbox"/> Soil <input type="checkbox"/> Oil <input type="checkbox"/> Other	
All containers needing acid/base preservation have been checked? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	12. Sample #
All containers needing preservation are found to be in compliance with EPA recommendation? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> NaOH <input type="checkbox"/> HNO <sub>3</sub> <input type="checkbox"/> H <sub>2</sub> SO <sub>4</sub> <input type="checkbox"/> Zinc Acetate
Exceptions: VOA, Coliform, TOC/DOC Oil and Grease, DRO/8015 (water) and <u>Dioxin</u> /PFAS <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Positive for Res. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Chlorine? <input type="checkbox"/> No      pH Paper Lot# <input type="checkbox"/> See Exception
	Res. Chlorine      0-6 Roll      0-6 Strip      0-14 Strip
Extra labels present on soil VOA or WIDRO containers? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	13. <input type="checkbox"/> See Exception
Headspace in VOA Vials (greater than 6mm)? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Trip Blank Present? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Trip Blank Custody Seals Present? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Pace Trip Blank Lot # (if purchased): _____

**CLIENT NOTIFICATION/RESOLUTION**

Person Contacted: \_\_\_\_\_  
Comments/Resolution: \_\_\_\_\_

Field Data Required?  Yes  No

Date/Time: \_\_\_\_\_

Project Manager Review: Kirsten Hojberg

Date: 6/3/2020

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office ( i.e. out of hold, incorrect preservative, out of temp, incorrect containers).



Document Name:  
**Sample Condition Upon Receipt (SCUR)  
 Exception Form**

Document Revised: 26Mar2020  
 Page 1 of 1

Document No.:  
**ENV-FRM-MIN4-0142 Rev.00**

Pace Analytical Services -  
 Minneapolis

**SCUR Exceptions:**

**Workorder #:**

Out of Temp Sample IDs	Container Type	# of Containers	PM Notified? <input type="checkbox"/> Yes <input type="checkbox"/> No															
			If yes, indicate who was contacted/date/time. If no, indicate reason why.															
			<b>Multiple Cooler Project?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No If you answered yes, fill out information to the left.															
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No Temp Blank																		
Read Temp	Corrected Temp	Average Temp																
3.8	3.9	4.5																
4.9	5.0																	
3.9	4.0																	
5.1	5.2																	

Tracking Number/Temperature

Other Issues		
Issue Type:	Container Type	# of Containers
Sample ID		

**pH Adjustment Log for Preserved Samples**

Sample ID	Type of Preserv.	pH Upon Receipt	Date Adjusted	Time Adjusted	Amount Added (mL)	Lot # Added	pH After	In Compliance after addition? <input type="checkbox"/> Yes <input type="checkbox"/> No	Initials
								<input type="checkbox"/> Yes <input type="checkbox"/> No	
								<input type="checkbox"/> Yes <input type="checkbox"/> No	
								<input type="checkbox"/> Yes <input type="checkbox"/> No	
								<input type="checkbox"/> Yes <input type="checkbox"/> No	

## Reporting Flags

- A = Reporting Limit based on signal to noise
- B = Less than 10x higher than method blank level
- C = Result obtained from confirmation analysis
- D = Result obtained from analysis of diluted sample
- E = Exceeds calibration range
- I = Interference present
- J = Estimated value
- L = Suppressive interference, analyte may be biased low
- Nn = Value obtained from additional analysis
- P = PCDE Interference
- R = Recovery outside target range
- S = Peak saturated
- U = Analyte not detected
- V = Result verified by confirmation analysis
- X = %D Exceeds limits
- Y = Calculated using average of daily RFs
- \* = See Discussion

### REPORT OF LABORATORY ANALYSIS

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Report No.....10520157



# **Appendix B**

## Sample Analysis Summary



### Method 1613B Sample Analysis Results

Client - Edge Analytical

Client's Sample ID	33337		
Lab Sample ID	10520157001		
Filename	F200607A_10		
Injected By	BAL		
Total Amount Extracted	969 mL	Matrix	Water
% Moisture	NA	Dilution	NA
Dry Weight Extracted	NA	Collected	06/02/2020
ICAL ID	F200601	Received	06/03/2020 09:50
CCal Filename(s)	F200606B_16	Extracted	06/04/2020 12:05
Method Blank ID	BLANK-79881	Analyzed	06/07/2020 19:36

Native Isomers	Conc pg/L	EMPC pg/L	RL pg/L	Internal Standards	ng's Added	Percent Recovery
2,3,7,8-TCDD	ND	----	5.0	2,3,7,8-TCDD-13C	2.00	108
				Recovery Standard 1,2,3,4-TCDD-13C	2.00	NA
				Cleanup Standard 2,3,7,8-TCDD-37Cl4	0.20	100

Conc = Concentration (Totals include 2,3,7,8-substituted isomers).  
 EMPC = Estimated Maximum Possible Concentration  
 RL = Reporting Limit

ND = Not Detected  
 NA = Not Applicable  
 NC = Not Calculated

R = Recovery outside target range  
 E = Exceeds calibration range

## REPORT OF LABORATORY ANALYSIS

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### Method 1613B Blank Analysis Results

Lab Sample Name	DFBLKAR	Matrix	Water
Lab Sample ID	BLANK-79881	Dilution	NA
Filename	F200606A_04	Extracted	06/04/2020 12:05
Total Amount Extracted	1050 mL	Analyzed	06/06/2020 14:49
ICAL ID	F200601	Injected By	BAL
CCal Filename(s)	F200605B_16		

Native Isomers	Conc pg/L	EMPC pg/L	RL pg/L	Internal Standards	ng's Added	Percent Recovery
2,3,7,8-TCDD	ND	----	5.0	2,3,7,8-TCDD-13C	2.00	102
				Recovery Standard 1,2,3,4-TCDD-13C	2.00	NA
				Cleanup Standard 2,3,7,8-TCDD-37Cl4	0.20	114

Conc = Concentration (Totals include 2,3,7,8-substituted isomers).  
 EMPC = Estimated Maximum Possible Concentration  
 RL = Reporting Limit

## REPORT OF LABORATORY ANALYSIS

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### Method 1613B Laboratory Control Spike Results

Lab Sample ID	LCS-79882	Matrix	Water
Filename	F200606A_01	Dilution	NA
Total Amount Extracted	1060 mL	Extracted	06/04/2020 12:05
ICAL ID	F200601	Analyzed	06/06/2020 12:35
CCal Filename	F200605B_16	Injected By	BAL
Method Blank ID	BLANK-79881		

Compound	Cs	Cr	Lower Limit	Upper Limit	% Rec.
2,3,7,8-TCDD	10	9.5	7.3	14.6	95
2,3,7,8-TCDD-37Cl4	10	8.5	3.7	15.8	85
2,3,7,8-TCDD-13C	100	88	25.0	141.0	88

Cs = Concentration Spiked (ng/mL)  
 Cr = Concentration Recovered (ng/mL)  
 Rec. = Recovery (Expressed as Percent)  
 Control Limit Reference: Method 1613, Table 6, 10/94 Revision  
 R = Recovery outside of control limits  
 Nn = Value obtained from additional analysis  
 \* = See Discussion

## REPORT OF LABORATORY ANALYSIS

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### Method 1613B Laboratory Control Spike Results

Lab Sample ID	LCSD-79883	Matrix	Water
Filename	F200606A_02	Dilution	NA
Total Amount Extracted	1050 mL	Extracted	06/04/2020 12:05
ICAL ID	F200601	Analyzed	06/06/2020 13:19
CCal Filename	F200605B_16	Injected By	BAL
Method Blank ID	BLANK-79881		

Compound	Cs	Cr	Lower Limit	Upper Limit	% Rec.
2,3,7,8-TCDD	10	11	7.3	14.6	106
2,3,7,8-TCDD-37Cl4	10	9.0	3.7	15.8	90
2,3,7,8-TCDD-13C	100	92	25.0	141.0	92

Cs = Concentration Spiked (ng/mL)  
 Cr = Concentration Recovered (ng/mL)  
 Rec. = Recovery (Expressed as Percent)  
 Control Limit Reference: Method 1613, Table 6, 10/94 Revision  
 R = Recovery outside of control limits  
 Nn = Value obtained from additional analysis  
 \* = See Discussion

## REPORT OF LABORATORY ANALYSIS

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**Method 1613B**

**Spike Recovery Relative Percent Difference (RPD) Results**

Client Edge Analytical

Spike 1 ID LCS-79882  
 Spike 1 Filename F200606A\_01

Spike 2 ID LCSD-79883  
 Spike 2 Filename F200606A\_02

Compound	Spike 1 %REC	Spike 2 %REC	%RPD
2,3,7,8-TCDD	95	106	10.9

%REC = Percent Recovered

RPD = The difference between the two values divided by the mean value

**REPORT OF LABORATORY ANALYSIS**

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## **6.6 Restrictive Covenant**

*Recorded & Sent  
to Ecology*

October 4, 2004

1524 Slater Road  
Ferndale, WA 98248  
(360) 384-1057 Tel  
(360) 384-5738 Fax

Mr. John Keeling  
Toxics Cleanup Program  
Washington State Dept. of Ecology  
Northwest Regional Office  
3190 160<sup>th</sup> Avenue SE  
Bellevue, WA 98008-5452

**RECOMP  
OF  
WASHINGTON**

Dear Mr. Keeling:

Re: Independent Remedial Action  
Recomp of Washington, 1524 Slater Road, Ferndale, WA 98248

Per your letter of September 20, 2004, enclosed please find a copy of the Recomp of Washington, Inc. Restrictive Covenant. The Restrictive Covenant was filed with Whatcom County on October 1, 2004.

As a Notary Public in and for the State of Washington residing in Ferndale, I certify that the enclosed copy of the Restrictive Covenant is a true copy of the original. My Notary expiration date is 09-28-2006. Thomas J. Bubanich Thomas J. Bubanich 10-04-04



Sincerely,

*Thomas J. Bubanich*

Thomas J. Bubanich  
Administrator

Cc: Frank Moscone, President, Recomp of Washington, Inc. (via email)  
Dave Bader, Environmental Health Services (via email)







2041000167

Page: 1 of 5

10/01/2004 2:44 PM

D/RC \$23.00

Whatcom County, WA

Request of: RECOMP OF WASHINGTON INC

**RETURN DOCUMENT TO:**

Recomp of Washington, Inc.

1524 Slater Road

Ferndale, WA 98248

*Use dark black ink and print legibly. Documents not legible will be rejected per RCW 65.04.045 & 65.04.047*

**DOCUMENT TITLE(S):**

RESTRICTIVE COVENANT

**AUDITOR FILE NUMBER & VOL. & PG. NUMBERS OF DOCUMENT(S) BEING ASSIGNED OR RELEASED:**

Four Pages

Additional reference numbers can be found on page \_\_\_\_\_ of document.

**GRANTOR(S)**

RECOMP OF WASHINGTON, INC.

Additional grantor(s) can be found on page \_\_\_\_\_ of document.

**GRANTEE(S):**

Additional grantee(s) can be found on page \_\_\_\_\_ of document.

**ABBREVIATED LEGAL DESCRIPTION: (Lot, block, plat name OR; qtr/qtr, section, township and range OR; unit, building and condo name.)**

LOT 4 RECOMP SHORT PLAT AS RECORDED BOOK 21 SHORT PLATS  
PG 93

Additional legal(s) can be found on page \_\_\_\_\_ of document.

**ASSESSOR'S 16-DIGIT PARCEL NUMBER:**

390233 183094 0000

Additional numbers can be found on page \_\_\_\_\_

The Auditor/Recorder will rely on the information provided on this form. The responsibility for the accuracy of the indexing information is that of the document preparer.

Section 5. The Owner of the Property must give thirty (30) days advance written notice to Ecology of the Owner's intent to convey interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 6. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.

Section 7. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 8. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times, and upon reasonable notice unless an emergency prevents such notice, for the purposes of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the property, and to inspect records that are related to the Remedial Action.

Section 9. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

Frank Moscone

Sept 30-04

Recomp of Washington, Inc.

Date

Signed before me by Frank Moscone on this 30th Day of September 2004. Thomas J. Bubanich  
Thomas J. Bubanich, Notary Public of Washington State. My Notary expire 09-28-2006, I reside in Ferndale, Washington





2041000167

Page: 1 of 5  
10/01/2004 2:44 PM  
D/RC \$23.00  
Whatcom County, WA

Request of: RECOMP OF WASHINGTON INC

**RETURN DOCUMENT TO:**

Recomp of Washington, Inc.  
1524 Slater Road  
Ferndale, WA 98248

*Use dark black ink and print legibly. Documents not legible will be rejected per RCW 65.04.045 & 65.04.047*

**DOCUMENT TITLE(S):**

RESTRICTIVE COVENANT

**AUDITOR FILE NUMBER & VOL. & PG. NUMBERS OF DOCUMENT(S)  
BEING ASSIGNED OR RELEASED:**

Four Pages

Additional reference numbers can be found on page \_\_\_\_\_ of document.

**GRANTOR(S)**

RECOMP OF WASHINGTON, INC.

Additional grantor(s) can be found on page \_\_\_\_\_ of document.

**GRANTEE(S):**

Additional grantee(s) can be found on page \_\_\_\_\_ of document.

**ABBREVIATED LEGAL DESCRIPTION: (Lot, block, plat name OR; qtr/qtr, section,  
township and range OR; unit, building and condo name.)**

LOT 4 RECOMP SHORT PLAT AS RECORDED BOOK 21 SHORT PLATS  
PG 93

Additional legal(s) can be found on page \_\_\_\_\_ of document.

**ASSESSOR'S 16-DIGIT PARCEL NUMBER:**

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The Auditor/Recorder will rely on the information provided on this form. The responsibility for the accuracy of the indexing information is that of the document preparer.

Recomp of Washington, Inc.  
1524 Slater Road  
Ferndale, WA 98248

## RESTRICTIVE COVENANT

This Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g), and WAC 173-340-440 by Recom of Washington, Inc., its successors and assigns, and the Washington State Department of Ecology, its successors and assigns.

Legal Description:    LOT 4 RECOMP SHORT PLAT AS RECORDED  
                          BOOK 21 SHORT PLATS PG 93

Tax Parcel I.D. #:        390233 183094 0000

## RESTRICTIVE COVENANT

### Recomp of Washington, Inc., 1524 Slater Road, Ferndale, Washington

This Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-44- by Recomp of Washington, Inc., its successors and assigns, and the State of Washington Department of Ecology, its successors and assigns (hereafter "Ecology").

An independent remedial action (hereafter "Remedial Action") occurred at the property that is the subject of this Restrictive Covenant. The Remedial Action conducted at the property is described in the following documents:

- Voluntary Cleanup Program Application and Report by Environmental Health Services, Inc., April 29, 2003.
- 1999 Annual Report, by Recomp of Washington, Inc., March 2000.
- Quarterly Groundwater Monitoring Reports by Vasey Engineering, from September 10, 1993 to December 18, 1996.
- Quarterly Groundwater Monitoring Reports by Environmental Health Services, Inc., from September 23, 1997 to September 16, 2001.
- Engineering Report Landfill Closure and Temporary Ash Storage Facility Construction by Harper Owes, June 28, 1989.
- Geotechnical Design Report Proposed Temporary Ash Storage Facility by Golder Associates, Inc.
- Technical Memorandum to Thermal Reduction Company Preliminary Hydrological Investigation, Bellingham, Washington by Golder Associates, June 1988, includes Appendix B (Groundwater) by Berryman and Henigar.
- Ecology's NFA letter of July 7, 2004.

These documents are on file at Ecology's Northwest Regional Office.

This Restrictive Covenant is required because the Remedial Action resulted in residual concentrations of Lead and Cadmium which exceed the Model Toxics Control Act Method B Residential Cleanup Levels for Soil established under WAC 173-340-740.

The undersigned, Recomp of Washington, Inc., is the fee owner of real property (hereafter "Property") in the County of Whatcom, State of Washington, that is subject to this Restrictive Covenant. The Property is legally described as follows: LOT 4 RECOMP SHORT PLAT AS RECORDED BOOK 21 SHORT PLATS PG 93 and located approximately within the SW ¼ of the SW ¼ of section 33 township 39N range 2E.

Recomp of Washington, Inc. makes the following declaration as to limitations, restrictions, and uses to which the Property may be put and specifies that such declarations shall constitute covenants to run with the land, as provided by law and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in Property (hereafter "Owner").

Section 1. Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil that was contained as part of the Remedial Action, or create a new exposure pathway, is prohibited. Some examples of activities that are prohibited in the capped areas include: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork.

Section 2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4. Any unpermitted activity on the property that may result in the release of contaminants remaining on the Property as part of the Remedial Action that may expose the City of Ferndale water sewer or storm water systems to contamination is prohibited without prior written approval from Ecology.

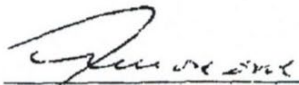
Section 5. The Owner of the Property must give thirty (30) days advance written notice to Ecology of the Owner's intent to convey interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 6. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.

Section 7. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

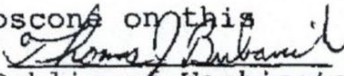
Section 8. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times, and upon reasonable notice unless an emergency prevents such notice, for the purposes of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the property, and to inspect records that are related to the Remedial Action.

Section 9. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.



Recomp of Washington, Inc.

Sept 30-04  
Date

Signed before me by Frank Moscone on this  
30th Day of September 2004.   
Thomas J. Bubanich, Notary Public of Washington  
State. My Notary expire 09-28-2006, I reside in  
Ferndale, Washington



## **6.7 Site Inspection Checklist**



### Site Inspection Checklist

SITE INFORMATION													
<b>Site name:</b> Recomp of Washington	<b>Date of inspection:</b> January 22, 2021												
<b>Location and Region:</b> 1524 Slater Road, Ferndale, Washington NWRO	<b>F/S ID:</b> 76245362												
<b>Agency, office, or company leading the five-year review:</b> Department of Ecology NWRO SWM (Whatcom County Health Department joined site walk)	<b>Weather/temperature:</b> cool and clear												
<b>Remedy Includes:</b> (Check all that apply) <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"><input checked="" type="checkbox"/> Landfill cover/containment</td> <td style="width: 50%; border: none;">- Monitored natural attenuation</td> </tr> <tr> <td style="border: none;">- Access controls</td> <td style="border: none;">- Groundwater containment</td> </tr> <tr> <td style="border: none;"><input checked="" type="checkbox"/> Institutional controls</td> <td style="border: none;"><input checked="" type="checkbox"/> Vertical barrier walls</td> </tr> <tr> <td style="border: none;">- Groundwater pump and treatment</td> <td style="border: none;"></td> </tr> <tr> <td style="border: none;">- Surface water collection and treatment</td> <td style="border: none;"></td> </tr> <tr> <td style="border: none;">- Other _____</td> <td style="border: none;"></td> </tr> </table>		<input checked="" type="checkbox"/> Landfill cover/containment	- Monitored natural attenuation	- Access controls	- Groundwater containment	<input checked="" type="checkbox"/> Institutional controls	<input checked="" type="checkbox"/> Vertical barrier walls	- Groundwater pump and treatment		- Surface water collection and treatment		- Other _____	
<input checked="" type="checkbox"/> Landfill cover/containment	- Monitored natural attenuation												
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<input checked="" type="checkbox"/> Institutional controls	<input checked="" type="checkbox"/> Vertical barrier walls												
- Groundwater pump and treatment													
- Surface water collection and treatment													
- Other _____													
<b>Attachments:</b> <input checked="" type="checkbox"/> Inspection team roster attached <input checked="" type="checkbox"/> Site map attached													
<b>INSTITUTIONAL CONTROLS</b> <input checked="" type="checkbox"/> Applicable    - N/A													
<b>A. Fencing</b>													
1. <b>Fencing damaged</b> - Location shown on site map                      - Gates secured <input checked="" type="checkbox"/> N/A Remarks: Fence in good condition, access restricted at entrance.													
<b>B. Other Access Restrictions</b>													
1. <b>Signs and other security measures</b> - Location shown on site map                      - N/A Remarks:													

<b>C. Institutional Controls (ICs)</b>			
<b>1. Implementation and enforcement</b>			
Site conditions imply ICs properly implemented	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Site conditions imply ICs being fully enforced	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Type of monitoring ( <i>e.g.</i> , self-reporting, drive by) self-reporting			
Frequency: Monthly			
Responsible party/agency _____			
Contact:	Dave Bader	Consultant-Environmental Health Services, LLC	(360) 739-3703
	Name	Title	Date Phone no.
Reporting is up-to-date	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Reports are verified by the lead agency	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Specific requirements in deed or decision documents have been met	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Violations have been reported	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Other problems or suggestions:     – Report attached			
<p>The landfill containment system includes native, low-permeability soils beneath the landfill, a compacted clay cover above the landfill material, and a gravel cutoff trench and leachate collection pipe downgradient of the landfill. Additionally, the soil-bentonite slurry wall and paved surfaces between the landfill cover and the slurry wall divert groundwater and surface water away from the closed ash landfill. The leachate collection pipe discharges to a leachate storage lagoon, which is pumped to the City of Ferndale wastewater treatment plant under a state waste discharge permit.</p>			
<b>2. Adequacy</b>	<input checked="" type="checkbox"/> ICs are adequate	<input type="checkbox"/> ICs are inadequate	<input type="checkbox"/> N/A
Remarks: The Restrictive Covenant for the Site was recorded and is in place. This Restrictive Covenant prohibits activities that would disturb the landfill cover and that may result in the release of hazardous substances into the environment.			

<b>GROUND COVERS</b> - Applicable - N/A			
<b>Surface</b>			
1.	<b>Settlement</b> (Low spots) Areal extent _____ Remarks _____	- Location shown on site map Depth _____	- Settlement not evident
2.	<b>Cracks</b> Lengths _____ Widths _____ Depths _____ Remarks _____	- Location shown on site map	- Cracking not evident
3.	<b>Erosion</b> Areal extent _____ Remarks _____	- Location shown on site map Depth _____	- Erosion not evident
4.	<b>Holes</b> Areal extent _____ Remarks _____	- Location shown on site map Depth _____	- Holes not evident
5.	<b>Vegetative Cover</b> - Trees/Shrubs (indicate size and locations on a diagram) Remarks _____	- Grass - Cover properly established	- No signs of stress
8.	<b>Wet Areas/Water Damage</b> - Wet areas - Ponding - Seeps - Soft subgrade Remarks _____	- Wet areas/water damage not evident - Location shown on site map - Location shown on site map - Location shown on site map - Location shown on site map	Areal extent _____ Areal extent _____ Areal extent _____ Areal extent _____
9.	<b>Slope Instability</b> Areal extent _____ Remarks _____	- Slides - Location shown on site map	- No evidence of slope instability

Treatment System	X Applicable	- N/A	Remarks: Wastewater treatment plant
1.	<p><b>Treatment Train</b> (Check components that apply)</p> <ul style="list-style-type: none"> <li>- Metals removal                      - Oil/water separation                      - Bioremediation</li> <li>- Air stripping                              - Carbon adsorbers</li> <li>- Filters _____</li> <li>- Additive (<i>e.g.</i>, chelation agent, flocculent) _____</li> <li>- Others _____</li> <li>- Good condition                      - Needs Maintenance</li> <li>- Quantity of groundwater treated annually _____</li> <li>- Quantity of surface water treated annually _____</li> </ul> <p>Remarks: No treatment prior to discharging to wastewater treatment plant.</p>		
2.	<p><b>Electrical Enclosures and Panels</b> (properly rated and functional)</p> <ul style="list-style-type: none"> <li>- N/A                      - Good condition                      X Needs Maintenance</li> </ul> <p>Remarks: Pump and flowmeter need upgrading.</p>		
3.	<p><b>Tanks, Vaults, Storage Vessels</b></p> <ul style="list-style-type: none"> <li>X N/A                      - Good condition                      - Proper secondary containment</li> <li>- Needs Maintenance</li> </ul> <p>Remarks: Leachate lagoon in good condition and fenced off with locking gate.</p>		
4.	<p><b>Discharge Structure and Appurtenances</b></p> <ul style="list-style-type: none"> <li>- N/A                      X Good condition                      - Needs Maintenance</li> </ul> <p>Remarks: Leachate storage lagoon.</p>		
5.	<p><b>Treatment Building(s)</b></p> <ul style="list-style-type: none"> <li>X N/A                      - Good condition (esp. roof and doorways)                      - Needs repair</li> <li>- Chemicals and equipment properly stored</li> </ul> <p>Remarks:</p>		
6.	<p><b>Monitoring Wells</b> (pump and treatment remedy)</p> <ul style="list-style-type: none"> <li>- Properly secured/locked                      X Functioning                      - Routinely sampled                      X Good condition</li> <li>- All required wells located                      X Needs Maintenance                      - N/A</li> </ul> <p>Remarks: There are no groundwater monitoring requirements under the solid waste regulations or the Restrictive Covenant. Well monuments not properly locked.</p>		

<p><b>Monitoring Data</b> Not applicable. There are no groundwater monitoring requirements under the solid waste regulations or the Restrictive Covenant.</p>	
1.	<p>Monitoring Data – Is routinely submitted on time – Is of acceptable quality</p>
2.	<p>Monitoring data suggests: – Groundwater plume is effectively contained – Contaminant concentrations are declining</p>
<p><b>E. Monitored Natural Attenuation</b></p>	
1.	<p><b>Monitoring Wells</b> (natural attenuation remedy) – Properly secured/locked – Functioning – Routinely sampled – Good condition – All required wells located – Needs Maintenance – N/A Remarks: Some wells need locks.</p>
<p><b>OTHER REMEDIES</b></p>	
<p>If there are remedies applied at the site not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.</p>	
<p><b>OVERALL OBSERVATIONS</b></p>	
<p><b>A. Implementation of the Remedy</b></p>	
<p>Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).</p> <p>The following conclusions have been made about the remedy for the Site:</p> <ul style="list-style-type: none"> <li>• The cleanup action (i.e., landfill closure) completed at the Site appears to be protective of human health and the environment.</li> <li>• The landfill containment system includes native, low-permeability soils beneath the landfill, a compacted clay cover above the landfill material, and a gravel cutoff trench and leachate collection pipe downgradient of the landfill. Additionally, the soil-bentonite slurry wall and paved surfaces between the landfill cover and the slurry wall divert groundwater and surface water away from the closed ash landfill.</li> <li>• The Restrictive Covenant for the property is in place and continues to be effective in protecting human health and the environment from exposure to hazardous substances and protecting the integrity of the cleanup action.</li> </ul>	
<p><b>B. Adequacy of O&amp;M</b></p>	
<p>Describe issues and observations related to the implementation and scope of O&amp;M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.</p> <p>The landfill is closed and a slurry wall extends around three sides to divert shallow groundwater around the landfill. The leachate collection line collects any groundwater from under the landfill and discharges it into the lagoon. The lagoon also receives various wastewater streams from the facility. Ecology issues a state waste discharge permit for the discharge of this water to the City of Ferndale wastewater treatment plant. Ecology’s Water Quality Program should evaluate any modification to this discharge.</p>	
<p><b>C. Early Indicators of Potential Remedy Problems</b></p>	

<p>Describe issues and observations such as unexpected changes in the cost or scope of O&amp;M or a high frequency of unscheduled repairs, which suggest that the protectiveness of the remedy may be compromised in the future.</p> <p>None identified.</p>
<p><b>Opportunities for Optimization</b></p>
<p>Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.</p> <p>The property owner needs to continue operating leachate collection pipe or propose a means of demonstrating that the operation of the leachate collection pipe is not necessary to prevent the release of hazardous substances from the landfill.</p>

Inspection Team:

Ecology: Alan Noell, Tim O'Connor

Whatcom County Health Department: Bill Angel, Ed Halasz

Environmental Health Services, LLC: Dave Bader

## 6.8 Photographs from January 22, 2021 Site Visit

**Photo 1: Waste transfer station located south of closed ash landfill, view to south**



**Photo 2: Closed ash landfill located north (opposing side) of ravine, view to north**



**Photo 3: Grass covered surface of southern portion of closed ash landfill, view to south**



**Photo 4: Northern portion of closed ash landfill is predominantly paved and used for scrap material staging, view to east**





**Photo 5: Northern portion of closed ash landfill, view to north from west side**



**Photo 6: Northern portion of closed ash landfill, view to north from east side**



**Photo 7: View of scrap material stored on northern portion of closed ash landfill**



**Photo 8: View of scrap material stored on northern portion of closed ash landfill, view to northeast**



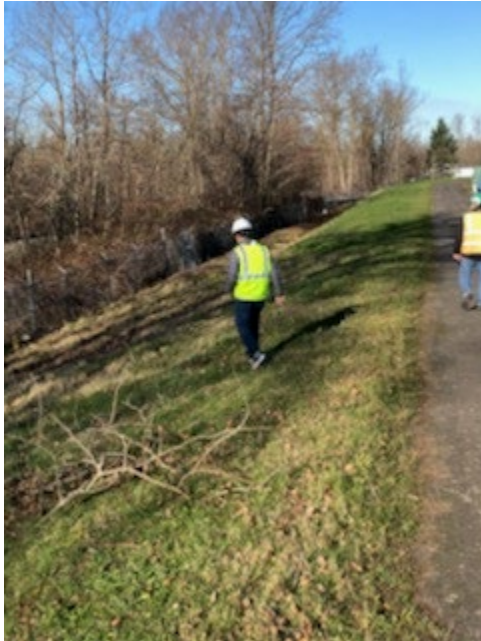
**Photo 9: Stormwater collection basin on northern portion of closed ash landfill**



**Photo 10: Stormwater discharge pipe extending west of closed ash landfill, view to north**



**Photo 11: West slope of closed ash landfill, view to north**



**Photo 12: West slope of closed ash landfill and drainage swale, view to southwest**



**Photo 13: Leachate storage lagoon located on northwest corner of property**

