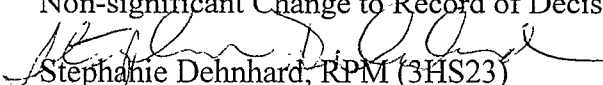


102192

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Southern Maryland Wood Treating Site
Non-significant Change to Record of Decision

FROM: 
Stephanie Dehnhard, RPM (3HS23)
Hazardous Site Cleanup Division
General Remedial Section

TO: Site File and Administrative Record

SEP 18 1998

This non-significant change to the September 1995 Record of Decision (ROD) for the Southern Maryland Wood Treating Site will allow the option of treating water treatment plant residuals onsite in the thermal desorption process in addition to the offsite disposal at a RCRA hazardous waste disposal facility currently specified in the ROD.

The ROD for the Southern Maryland Wood Treating Site included the delisting of hazardous wastes (K001, F032, and F034) found in site soil. Soil contaminated with these listed wastes will be managed as hazardous waste until it is treated by thermal desorption onsite and meets the established delisting criteria. The treated soil will then be backfilled onsite.

The Performance Standards found in Section 10.1, paragraph 6 of the ROD also state that "any water treatment residuals determined to be hazardous wastes, either listed or characteristic, shall be disposed of offsite at a RCRA hazardous waste facility." Because the sludge is derived from the treatment of soil contaminated with a listed hazardous waste, and contains the same contaminants as the soil, the sludge must also be managed as a hazardous waste until it is treated and shown to meet the delisting criteria established for the soil. The sludge is amenable to treatment by onsite thermal desorption because it contains similar contaminants to the soil. The thermal desorption process has been successfully treating contaminated soil onsite since the Proof of Performance testing was conducted in June 1998. Analytical data also show that the sludge is not a characteristic waste (see attached data) as defined at COMAR 26.13.02.14, and 40 CFR Section 261.24.

Therefore, rather than necessarily disposing of the sludge offsite as a hazardous waste, the sludge may be treated onsite in the thermal desorption process. The treated sludge will then be analyzed to ensure that it meets all established delisting levels before it is backfilled onsite.

With respect to the volume of sludge generated over the life of the project, it is estimated that the volume will be small, approximately 600 cubic yards, relative to the volume of soil used to determine the delisting criteria in the ROD, approximately 80,000 cubic yards. Therefore, this is

an insignificant increase in the volume, less than one percent, which will not change the Dilution Attenuation Factor used to calculate the delisting criteria.

The difference in the cost could be substantial- \$1,196,800 for offsite disposal as hazardous waste versus \$112,400 for onsite treatment. Treating the sludge onsite could help to contain the costs of the cleanup at the site.

Since the water treatment plant sludge can be treated onsite in compliance with ARARs and at a potentially significant cost savings over offsite disposal, the remedial action may then employ onsite treatment for the treatment plant sludge in addition to offsite disposal as called for in the ROD. This change is a non-significant change to the Record of Decision.

Volume Estimate for Entire Project

$$(40 \text{ ft}^3/\text{day}) \times (1 \text{ yd}^3/27\text{ft}^3) \times 400 \text{ days production} = 600 \text{ yd}^3$$

Disposal Cost for the Entire Project:

For estimating purposes:

\$1/lb for transportation/disposal. Actual costs at the Southern Maryland Wood Treating Site confirm that this is a reasonable estimate.

40ft³ /day sludge produced

$$(40 \text{ ft}^3/\text{day}) \times (7.48 \text{ gal}/\text{ft}^3) \times (10 \text{ lbs}/\text{gal}) = 2992 \text{ lbs}/\text{day}$$

$$\text{Disposal Cost} = (2992 \text{ lbs}/\text{day}) \times (400 \text{ days production}) \times (\$1/\text{lb}) = \$1,196,800$$

Onsite Treatment Cost for Entire Project

$$\text{Labor to transport sludge to onsite treatment process: } (8 \text{ hrs}/\text{day}) \times (400 \text{ days}) \times (\$24/\text{hour}) = \$76,800$$

Processing cost at the onsite thermal desorption units (TDUs): assume 14 tons per hour at TDU will cost \$20,000/day of operation

$$(2992 \text{ lbs}/\text{day}) \times (400 \text{ days}) \times (1 \text{ ton}/2000 \text{ lbs}) \times (1 \text{ day}/24 \text{ hrs}) \times (\$20,000/\text{day of operation}) \times (1 \text{ hr}/14 \text{ tons}) = \$35,600$$

$$\text{Onsite Treatment Cost} = \$76,800 + \$35,600 = \$112,400$$

Memo

To: Joseph Kelleher
From: Wendy Werkheiser
cc: Ralph Buckles, Mike Flaherty, Randy Ortlund, Bill Simpson, Brian Roebuck
Date: 07/27/98
Re: Filter Press Cake

Attached are the results of the TCLP analysis of the filter press cake sampled during the POP (6/14/98) and the WTP-1 sludge sampled on 12/18/98 (sludge was re-sampled for ignitability on 3/10/98). Results show that these materials can be successfully treated by the TDUs. We therefore recommend that these materials be treated by the TDUs. Also attached is Kirk's analysis that shows the cost benefit of retreating this material versus sending it off-site for disposal. Please obtain USACE approval to treat this material in the TDUs before August 7, 1998. Otherwise, we will likely have to dispose of this material off-site, which Kirk estimates will cost \$20,000 for the first shipment.

AR305078

FILTER PRESS CAKE RESULTS (6/14/98)

Parameter	Result (ug/L)	Reporting Limit (ug/L)	HW Char/Toxicity Regulatory Level (ug/L)
Semivolatile Organic Compounds by 1311/3520C/8270C			
1,4-Dichlorobenzene	ND	100	7500
2,4-Dinitrotoluene	ND	100	130
Hexachlorobenzene	ND	100	130
Hexachlorobutadiene	ND	100	500
Hexachloroethane	ND	100	3000
2-Methylphenol	ND	100	200000
3-Methylphenol	10J	100	200000
4-Methylphenol	ND	100	200000
Nitrobenzene	ND	100	2000
Pyridine	46J	100	5000
2,4,5-Trichlorophenol	ND	100	400000
2,4,6-Trichlorophenol	ND	100	2000
Pesticides by 1311/8081A			
γ-BHC (Lindane)	ND	0.5	400
Chlordane	ND	10	30
Endrin	ND	1	20
Heptachlor (and its oxides)	ND	0.5	8
Methoxychlor	ND	5	10000
Toxaphene	ND	50	500
Volatile Organic Compounds by 1311/5030/8260B			
Benzene	ND	130	500
2-Butanone (MEK)	ND	130	200000
Carbon tetrachloride	ND	130	500
Chlorobenzene	ND	130	100000
Chloroform	ND	130	6000
1,2-Dichloroethane	ND	130	500
1,1-Dichloroethene	ND	130	700
Tetrachloroethene	ND	130	700
Trichloroethene	ND	130	500
Vinyl chloride	ND	130	200
Herbicides and Pentachlorophenol by 1311/8151A			
2,4-D	ND	5	10000
2,4,5-TP	ND	0.5	1000
Pentachlorophenol	ND	1	100000
Metals by 1311/3005A/7470A			
Mercury	ND	0.2	200
Metals by 1311/3005A/6010B			
Arsenic	ND	17	5000
Barium	888		100000
Cadmium	ND	3	1000
Chromium	28.2		5000
Lead	ND	13	5000
Selenium	ND	31	1000
Silver	ND	12	5000

AR305079

WTP-1 SLUDGE RESULTS (12/18/98)

Parameter	Result (ug/L)	Reporting Limits (ug/L)	HW Char/Toxicity Regulatory Levels (ug/L)
Semivolatile Organic Compounds by 1311/8270			
1,4-Dichlorobenzene	ND	50	7500
2,4-Dinitrotoluene	ND	50	130
Hexachlorobenzene	ND	50	130
Hexachlorobutadiene	ND	50	500
Hexachloroethane	ND	50	3000
2-Methylphenol	8J	50	200000
3-Methylphenol	16J	50	200000
4-Methylphenol	16J	50	200000
Nitrobenzene	ND	50	2000
Pentachlorophenol	ND	250	100000
Pyridine	8J	50	5000
2,4,5-Trichlorophenol	ND	50	400000
2,4,6-Trichlorophenol	ND	50	2000
Pesticides by 1311/8080			
γ-BHC (Lindane)	ND	0.2	400
Chlordane	ND	0.7	30
Endrin	ND	0.3	20
Heptachlor (and its oxides)	ND	4.2	8
Methoxychlor	ND	8.8	10000
Toxaphene	ND	12	500
Volatile Organic Compounds by 1311/8240			
Benzene	ND	100	500
2-Butanone (MEK)	ND	100	200000
Carbon tetrachloride	ND	100	500
Chlorobenzene	ND	100	100000
Chloroform	ND	100	6000
1,2-Dichloroethane	ND	100	500
1,1-Dichloroethene	ND	100	700
Tetrachloroethene	ND	100	700
Trichloroethene	ND	100	500
Vinyl chloride	ND	100	200
Herbicides by 1311/8150			
2,4-D	ND	60	10000
2,4,5-TP	ND	8.5	1000
Metals by 1311/7470			
Mercury	ND	2	200
Metals by 1311/6010			
Arsenic	ND	100	5000
Barium	1260	100	100000
Cadmium	ND	30	1000
Chromium	ND	50	5000
Lead	ND	30	5000
Selenium	ND	50	1000
Silver	ND	30	5000

AR305080

Parameter	Results	Reporting Limits	HW Char. Regulatory Levels
Ignitability by 1010			
Flashpoint (3/10/98)	>205.7°F	±0.1°F	>140°F
Corrosivity by 9045			
pH	7.96	±0.01	2-12.5
Total Reactive Cyanide by SW846 7.3.3			
Reactive Cyanide	ND	0.025 mg/kg	250 mg/kg
Total Reactive Sulfide by SW846 7.3.4			
Reactive Sulfide	ND	4.93 mg/kg	500 mg/kg

AR305081

GP ENVIRONMENTAL SERVICES
ORGANIC ANALYSIS RESULTSGP ID: 9712113-02A
Client ID: 97-031 SLUDGE
Collected: 12/18/97
Dilution: 1Matrix: SOLID
Method: 8270 TCLP
Units: ug/LAnalyst: MM
Analyzed: 01/06/98
Prepared:

SEMIVOLATILE TARGET COMPOUNDS

Parameter	Result	Det.Lim.	Qualifier
1,4-Dichlorobenzene	BQL	50	
2,4,5-Trichlorophenol	BQL	50	
2,4,6-Trichlorophenol	BQL	50	
2,4-Dinitrotoluene	BQL	50	
Hexachlorobenzene	BQL	50	
Hexachlorobutadiene	BQL	50	
Hexachloroethane	BQL	50	
m + p-Cresol	16	50	J
Nitrobenzene	BQL	50	
o-Cresol	8	50	J
Pentachlorophenol	BQL	250	
Pyridine	8	50	J

AR305082

GP ENVIRONMENTAL SERVICES
ORGANIC ANALYSIS RESULTSGP ID: 9712113-02A
Client ID: 97-031 SLUDGE
Collected: 12/18/97
Dilution: 10Matrix: SOLID
Method: 8240 TCLP
Units: ug/LAnalyst: JAH
Analyzed: 01/02/98
Prepared:

VOLATILE TARGET COMPOUNDS

Parameter	Result	Det.Lim.	Qualifier
1,1-Dichloroethene	BQL	100	
1,2-Dichloroethane	BQL	100	
1,4-Dichlorobenzene	BQL	100	
2-Butanone	BQL	100	
Benzene	BQL	100	
Carbon tetrachloride	BQL	100	
Chlorobenzene	BQL	100	
Chloroform	BQL	100	
Tetrachloroethene	BQL	100	
Trichloroethene	BQL	100	
Vinyl chloride	BQL	100	

AR305083

GP ENVIRONMENTAL SERVICES
ORGANIC ANALYSIS RESULTSGP ID: 9712113-02A
Client ID: 97-031 SLUDGE
Collected: 12/18/97
Dilution: 1Matrix: SOLID
Method: 8080 TCLP
Units: ug/LAnalyst: AK
Analyzed: 01/07/98
Prepared: 01/04/98

GC TARGET COMPOUNDS

Parameter	Result	Det.Lim.	Qualifier
Chlordane	BQL	0.70	
Endrin	BQL	0.30	
gamma-BHC (Lindane)	BQL	0.20	
Heptachlor	BQL	0.15	
Heptachlor epoxide	BQL	4.2	
Methoxychlor	BQL	8.8	
Toxaphene	BQL	12	

AR305084

GP ENVIRONMENTAL SERVICES
ORGANIC ANALYSIS RESULTS

GP ID: 9712113-02A
Client ID: 97-031 SLUDGE
Collected: 12/18/97
Dilution: 1

Matrix: SOLID
Method: 8150 TCLP
Units: ug/L

Analyst: AK
Analyzed: 01/05/98
Prepared: 01/02/98

GC TARGET COMPOUNDS

Parameter	Result	Det.Lim.	Qualifier
2,4-D	BQL	60	
Silvex	BQL	8.5	

AR305085

GP ENVIRONMENTAL SERVICES
ORGANIC ANALYSIS RESULTS

GP ID: 9712113-02
Client ID: 97-031 SLUDGE

Matrix: SOLID
Collected: 12/18/97

Parameter	Method	Result	Det.Lim.	Units	Dil.	Prepared	Analyzed By
Flash point	SW846 1010	35	100	deg. C			12/20/97 DH

AR305086

GP ENVIRONMENTAL SERVICES
METALS ANALYSIS RESULTS

GP ID: 9712113-01

Client ID: 97-031 CARBON

Matrix: SOLID

Collected: 12/18/97

Parameter	Method	Result	Det.Lim.	Units	Dil.	Prepared	Analyzed By
TCLP Silver	SW846 6010T	BQL	30.0	ug/L	1	01/02/98	01/02/98 SD
TCLP Arsenic	SW846 6010T	BQL	100	ug/L	1	01/02/98	01/02/98 SD
TCLP Barium	SW846 6010T	811	100	ug/L	1	01/02/98	01/02/98 SD
TCLP Cadmium	SW846 6010T	BQL	30.0	ug/L	1	01/02/98	01/02/98 SD
TCLP Chromium	SW846 6010T	BQL	50.0	ug/L	1	01/02/98	01/02/98 SD
TCLP Mercury	SW846 7470T	BQL	2.00	UG/L	1	01/02/97	01/02/98 DDH
TCLP Lead	SW846 6010T	BQL	30.0	ug/L	1	01/02/98	01/02/98 SD
TCLP Selenium	SW846 6010T	BQL	50.0	ug/L	1	01/02/98	01/02/98 SD

GP ID: 9712113-02

Client ID: 97-031 SLUDGE

Matrix: SOLID

Collected: 12/18/97

Parameter	Method	Result	Det.Lim.	Units	Dil.	Prepared	Analyzed By
TCLP Silver	SW846 6010T	BQL	30.0	ug/L	1	01/02/98	01/02/98 SD
TCLP Arsenic	SW846 6010T	BQL	100	ug/L	1	01/02/98	01/02/98 SD
TCLP Barium	SW846 6010T	1260	100	ug/L	1	01/02/98	01/02/98 SD
TCLP Cadmium	SW846 6010T	BQL	30.0	ug/L	1	01/02/98	01/02/98 SD
TCLP Chromium	SW846 6010T	BQL	50.0	ug/L	1	01/02/98	01/02/98 SD
TCLP Mercury	SW846 7470T	BQL	2.00	UG/L	1	01/02/97	01/02/98 DDH
TCLP Lead	SW846 6010T	BQL	30.0	ug/L	1	01/02/98	01/02/98 SD
TCLP Selenium	SW846 6010T	BQL	50.0	ug/L	1	01/02/98	01/02/98 SD

AR305087

GP ENVIRONMENTAL SERVICES
WET CHEMISTRY ANALYSIS RESULTS

GP ID: 9712113-02

Client ID: 97-031 SLUDGE

Matrix: SOLID

Collected: 12/18/97

Parameter	Method	Result	Det.Lim.	Units	Dil.	Prepared	Analyzed By
Reactive Cyanide	SW846 7.3.3	BQL	0.025	mg/Kg	1		12/23/97 AS
pH	SW846 9045	8.96	0.010	pH	1		12/26/97 AS
Reactive Sulfide	SW846 7.3.4	BQL	4.93	mg/Kg	1		12/23/97 TD
Percent Solids	MCAWW 160.3	10.3		%			12/24/97 JH

AR305088

IGNITABILITY
Method 1010

Lab Name: Paragon Analytics, Inc.
Client Name: ICF Kaiser Engineers, Inc.
Client Project ID: 66716-505-03
Lab Workorder Number: 98-03-075

Date Collected: 03/10/98
Date Analyzed: 03/13/98
Sample Matrix: Water

Sample ID	Lab Sample ID	Ignitable At (degree C)	Non-Ignitable Below (degree C)
SEDTK1	98-03-075-10		96.5
SEDTK1D	93-03-075-11		96.5

AR305089

Semi-volatile Organics by GC/MS

Method SW8270-TCLP Leachate

Lab Name: Paragon Analytica, Inc.

Work Order Number: 9806138

Client Name: ICF Kaiser Engineers, Inc.

Client Project ID: 66716-505-03

PRELIMINARY RESULTS

Reported on: Friday, July 10, 1998

Field ID:	PPFPC01
Lab ID:	9806138-23

Sample Matrix: liquid

% Moisture: N/A

Cleanup Method: NONE

Report Basis: AS RECEIVED

Date Collected: 14-Jun-98

Date Extracted: 28-Jun-98

Date Analyzed: 06-Jul-98

Prep Batch: EX980626-3

Sample Aliquot: 100

Final Volume: 1

Dilution: 1

LEACH DATE: 6/21/98

CASNO	Target Analyte	Result	Units	Reporting Limit	Result Qualifier	Result Footnote
110-86-1	PYRIDINE	0.048	mg/l	0.1	J	
106-46-7	1,4-DICHLOROBENZENE	0.1	mg/l	0.1	U	
95-48-7	2-METHYLPHENOL	0.1	mg/l	0.1	U	
108-39-4	3+4-METHYLPHENOL	0.01	mg/l	0.1	J	
67-72-1	HEXACHLOROETHANE	0.1	mg/l	0.1	U	
98-96-3	NITROBENZENE	0.1	mg/l	0.1	U	
87-68-3	HEXACHLOROBUTADIENE	0.1	mg/l	0.1	U	
88-06-2	2,4,6-TRICHLOROPHENOL	0.1	mg/l	0.1	U	
95-95-4	2,4,6-TRICHLOROPHENOL	0.1	mg/l	0.1	U	
121-14-2	2,4-DINITROTOLUENE	0.1	mg/l	0.1	U	
118-74-1	HEXACHLOROBENZENE	0.1	mg/l	0.1	U	
87-86-5	PENTACHLOROPHENOL	0.05	mg/l	0.05	U	
108-95-2	PHENOL	0.052	mg/l	0.1	J,B	
95-67-8	2-CHLOROPHENOL	0.1	mg/l	0.1	U	
105-67-8	2,4-DIMETHYLPHENOL	0.1	mg/l	0.1	U	
59-50-7	4-CHLORO-3-METHYLPHENOL	0.1	mg/l	0.1	U	
51-28-5	2,4-DINITROPHENOL	0.1	mg/l	0.1	U	
58-90-2	2,3,4,6-TETRACHLOROPHENOL	0.1	mg/l	0.1	U	
86-74-8	CARBAZOLE	0.1	mg/l	0.1		

AR305090

Semi-volatile Organics by GC/MS

Method SW8270--TCLP Leachate

PRELIMINARY RESULTS

Lab Name: Paragon Analytics, Inc.

Work Order Number: 9806138

Client Name: ICF Kaiser Engineers, Inc.

Client Project ID: 68716-505-03

Reported on: Friday, July 10, 1998

PPFPC01
9806138-23

Sample Matrix: liquid

% Moisture: N/A

Cleanup Method: NONE

Report Basis: AS RECEIVED

Date Collected: 14-Jun-98

Date Extracted: 26-Jun-98

Date Analyzed: 08-Jul-98

Prep Batch: EX980626-3

Sample Aliquot: 100

Final Volume: 1

Dilution: 1

LEACH DATE: 6/21/98

Surrogate Recovery

CASNO	Surrogate Analyte	Result	Units	Spike Amount	Percent Recovery	Control Limits
118-79-6	2,4,6-TRIBROMOPHENOL	0.544	mg/l	0.75	73	23 - 100
321-60-6	2-FLUOROBIPHENYL	0.344	mg/l	0.5	69	21 - 106
367-12-4	2-FLUOROPHENOL	0.523	mg/l	0.75	70	21 - 100
4165-50-0	NITROBENZENE-D5	0.399	mg/l	0.5	80	34 - 111
4165-62-2	PHENOL-D6	0.813	mg/l	0.75	82	15 - 104
1718-51-0	TERPHENYL-D14	0.476	mg/l	0.5	95	33 - 111

AR305091

Volatile Organics by GC/MS

Method SW8260-TCLP Leachate

Lab Name: Paragon Analytics, Inc.
Work Order Number: 9806138

Client Name: ICF Kaiser Engineers, Inc.

Client/Project ID: 66716-505-03

PRELIMINARY RESULTS

Reported on: Tuesday, July 07, 1998

Field ID: PPFC01
Lab ID: 9806138-22

Sample Matrix: Liquid
% Moisture: N/A
Cleanup Method: NONE
Report Basis: AS RECEIVED

Date Collected: 14-Jun-98
Date Extracted: 28-Jun-98
Date Analyzed:
Prep Batch: V06138T

Sample Aliquot: 5
Final Volume: 5
Dilution: 5
LEACH DATE: 6/27/98

CASNO	Target Analyte	Result	Units	Reporting Limit	Result Qualifier	Result Footnote
100-41-4	ETHYLBENZENE	1.8	ug/L	130	J	
136777-61-	M+P-XYLENE	3	ug/L	130	J	
95-47-8	O-XYLENE	2.3	ug/L	130	J	
100-42-5	STYRENE	5.8	ug/L	130	J	
75-01-4	VINYL CHLORIDE	130	ug/L	130	U	
75-35-4	1,1-DICHLOROETHENE	130	ug/L	130	U	
78-93-3	2-BUTANONE	130	ug/L	130	U	
67-88-3	CHLOROFORM	130	ug/L	130	U	
56-23-5	CARBON TETRACHLORIDE	130	ug/L	130	U	
107-06-2	1,2-DICHLOROETHANE	130	ug/L	130	U	
71-43-2	BENZENE	130	ug/L	130	U	
79-01-8	TRICHLOROETHENE	130	ug/L	130	U	
127-18-4	TETRACHLOROETHENE	130	ug/L	130	U	
106-90-7	CHLOROBENZENE	130	ug/L	130	U	

Surrogate Recovery

CASNO	Surrogate Analyte	Result	Units	Spike Amount	Percent Recovery	Control Limits
460-00-4	4-BROMOFLUOROBENZENE	49.4	ug/l	50	99	86 - 115
1868-83-7	DIBROMOFLUOROMETHANE	51.4	ug/l	50	103	85 - 118
2037-26-5	TOLUENE-D8	49.7	ug/l	50	99	88 - 110

U = Less than the Reporting Limit

AR305092

Organochlorine Pesticides

Method SW8081-TCLP Leachate

Lab Name: Paragon Analytics, Inc.

Work Order Number: 9806138

Client Name: ICF Kaiser Engineers, Inc.

Client/Project ID: 86716-505-03

Reported on: Thursday, July 02, 1998

Field ID: PPFCO1
Lab ID: 9806138-23

Sample Matrix: liquid

% Moisture: N/A

Cleanup Method: NONE

Report Basis: AS RECEIVED

Date Collected: 14-Jun-98

Date Extracted: 25-Jun-98

Date Analyzed: 01-Jul-98

Prop Batch: EX980625-6

Sample Aliquot: 100

Final Volume: 10

Dilution: 1

LEACH DATE: 8/21/98

CASNO	Target Analyte	Result	Units	Reporting Limit	Result Qualifier	Result Footnote
58-89-9	GAMMA-BHC (LINDANE)	0.0005	mg/l	0.0005	U	
76-44-8	HEPTACHLOR	0.0005	mg/l	0.0005	U	
72-20-8	ENDRIN	0.001	mg/l	0.001	U	
72-43-5	METHOXYCHLOR	0.005	mg/l	0.005	U	
8001-35-2	TOXAPHENE	0.05	mg/l	0.05	U	
57-74-9	CHLORDANE	0.01	mg/l	0.01	U	

Surrogate Recovery

CASNO	Surrogate Analyte	Result	Units	Spike Amount	Percent Recovery	Control Limits
2061-24-3	DECACHLOROBIIPHENYL	0.0047	mg/l	0.005	95	48 - 143
877-08-8	TETRACHLORO-M-XYLENE	0.0054	mg/l	0.005	109	44 - 131

U = Less than the Reporting Limit

PRELIMINARY RESULTS

AR305093

Herbicides
Method --TCLP Leachate

Lab Name: Paragon Analytics, Inc.
Work Order Number: 9806138
Client Name: ICF Kaiser Engineers, Inc.
Client Project ID: 66716-505-03

Reported on: Thursday, July 09, 1998

PPFPCO1
9806138-23

Sample Matrix: liquid	Date Collected: 14-Jun-98	Sample Aliquot: 100
% Moisture: N/A	Date Extracted: 25-Jun-98	Final Volume: 10
Cleanup Method: NONE	Date Analyzed: 04-Jul-98	Dilution: 1
Report Basis: AS RECEIVED	Prep Batch: EX980625-3	LEACH DATE: 6/21/98

CASNO	Target Analyte	Result	Units	Reporting Limit	Result Qualifier	Result Footnote
94-75-7	2,4-D	0.005	mg/l	0.005	U	
87-86-5	PENTACHLOROPHENOL	0.001	mg/l	0.001	U	
93-72-1	SILVEX	0.0005	mg/l	0.0005	U	

Surrogate Recovery

CASNO	Surrogate Analyte	Result	Units	Spike Amount	Percent Recovery	Control Limits
19719-28-9	2,4-DICHLOROPHENYLACETIC ACID	0.0174	mg/l	0.02	87	47 - 154

U = Less than the Reporting Limit

PRELIMINARY RESULTS

AR305094

EPA SAMPLE NO.

Concentration Units (ug/L or mg/kg dry weight): UG/L_

[illegible]

AR305095