

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorne Street San Francisco, CA 94105

WASTE MANAGEMENT DIVISION RCRA ENFORCEMENT OFFICE TSCA COMPLIANCE EVALUATION INSPECTION REPORT

Purpose:

Facility:

TSCA Compliance Evaluation Inspection

Clean Harbors Los Angeles, LLC 5756 Alba Street Los Angeles, CA 90058

EPA ID Number:

CAD 050 806 850

August 25, 2011

Date of Inspection:

EPA Representatives:

Jennifer Downey Enforcement Officer (415) 972-3342 downey.jennifer@epa.gov

Christopher Rollins Enforcement Officer (415) 947-4166 rollins.christopher@epa.gov

Facility Representatives:

Dave Cochran General Manager (323) 277-2521

Joe Christopher Compliance Manager (310) 835-0775 x 499

Mac Hardaway General Manager – Transformer Services (323) 277-2508

Jesus Vela Operations Supervisor



Report Prepared By:

Jennifer Downey

Report Date:

October 12, 2011

Introduction

On August 25, 2011, U.S. Environmental Protection Agency ("EPA") representatives conducted an unannounced Toxic Substances Control Act ("TSCA") Compliance Evaluation Inspection ("CEI") of Clean Harbors Los Angeles, LLC ("Clean Harbors"), located at 5756 Alba Street, in Los Angeles, California. The purpose of the inspection was to determine Clean Harbors' compliance with the Polychlorinated Biphenyls ("PCBs") regulations under 40 Code of Federal Regulations ("C.F.R.") parts 761, and the California Health and Safety Code ("HSC"), Division 20, Chapter 6.5; and the California Code of Regulations ("C.C.R."), Title 22, Division 4.5.

This inspection report summarizes the events that transpired during the inspection, the observations and findings made by the EPA inspectors, and information received from the facility subsequent to the inspection.

| TO STRAN BT. | |
|-------------------------|--|
| Facility Name | Clean Harbors Los Angeles, LLC ("Clean Harbors") |
| Established | EPA originally granted this facility location a TSCA Approval |
| | under the name Oil Process Company in 1991. On February 15, |
| | 2002, the TSCA PCB Approval for the 5756 Alba Street facility |
| | location expired. However, the permit has been administratively |
| | extended until EPA can complete its review of Clean Harbors' |
| | application for permit renewal, which was submitted prior to the |
| | permit expiration date. |
| Number of Employees | 25 Employees |
| Hours of Operation | 6:00 am to 10:30 pm (2 shifts) |
| Filed Notification of | This facility location first filed a Notification of PCB Waste |
| PCB Waste Activity Form | Activity Form on January 24, 1990. Clean Harbors submitted an |
| | additional Notification of PCB Activity Form notifying EPA of |
| | its generator status on July 26, 2007. |
| Facility Processes | Clean Harbors provides environmental and hazardous waste |
| | management services in the United States. The facility |
| | specializes in decontamination, emergency response, disposal |
| | and recovery services related to hazardous waste and used oil. |
| | This location also stores and consolidates PCBs and PCB |
| | Equipment destined for disposal at TSCA regulated facilities. |
| Waste Streams | Used Oil, PCB liquids, PCB Equipment and scrap metal from the |
| 1 | processing of Non-PCB and PCB equipment. |
| PCB Facility Status | PCB Commercial Storage Facility |
| Last Inspection | EPA Region 9 last conducted a TSCA PCB inspection of the |
| | Clean Harbors facility on July 16, 2009. Violations documented |
| | in the report included failure to properly mark PCBs and PCB |
| | items, failure to include the removal from service dates on PCB |
| | containers and manifests, and failure to mark all equipment used |
| | for handling PCBs with the PCB M _L label. |

Facility Background



Google Earth Aerial View of the Clean Harbors Los Angeles Facility



Photo 1 - Entrance to the Facility

Facility Inspection

On August 25, 2011, EPA representatives arrived at Clean Harbors Los Angeles, California facility at approximately 11:12 am. Two EPA Region 9 inspectors (Ms. Jennifer Downey and Mr. Christopher Rollins) were present during the inspection.

During the in-brief, the inspectors presented their credentials. Mr. Rollins then presented and explained the Notice of Inspection form (Attachment 3a.) and a TSCA Inspection Confidentiality Notice form (Attachment 3b.) to the Clean Harbors representatives.

Under TSCA, the Notice of Inspection form is required to be signed prior to conducting an inspection and the TSCA Confidentiality Notice form outlines Clean Harbors' right to claim PCB materials or documents collected during or after the inspection as TSCA Confidential Business Information ("CBI"). No documents were declared CBI during EPA's inspection. Both EPA and the facility signed both forms and EPA concluded its in-brief.

EPA inspectors conducted a walk-through of the facility and collected eleven surface wipe samples to evaluate Clean Harbors' management of PCBs.

The following summarize the areas inspected and the potential violations found near or adjacent to the Truck Loading Dock, Container Storage Warehouse, and On-Site Laboratory.

Area 1: Truck Loading Dock

The inspectors observed sixteen 55-gallon drums containing PCB waste on pallets in the Truck Loading Dock area that were ready to be shipped offsite (see Photo 2). The out of service date was marked on the top of each drum. In addition, the drums were marked with a PCB M_L label, a hazardous waste label (designating the PCB material as a California-only hazardous waste) and an internal tracking label. The hazardous waste labels and internal tracking labels were each marked with their own dates, which did not correspond with the out of service date. The inspectors noted that all of the hazardous waste labels were marked with an accumulation start date of 8/24/2011 (see Photo 3). According to facility representatives, the hazardous waste labels had been affixed to the drums the day before when Clean Harbors generated the manifest(s) which will accompany the waste when it is shipped offsite for treatment and disposal at another facility. The inspectors expressed concern that Clean Harbors was not entering the out of service date as the hazardous waste accumulation start date.



Photo 2 - Containers in Truck Loading Dock Area



Photo 3 - Hazardous Waste Label Dated 8/24/2011

Area 2: Container Storage Warehouse

| Location | Waste Type | Potential Violation | Photo |
|-------------------|---------------------------------|---------------------|-------|
| Warehouse Floor | PCB Wipe Sample CH082511SW-1 | None | N/A |
| Entrance | PCB Wipe Sample CH082511SW-2 | None | N/A |
| Ramp | PCB Wipe Sample CH082511SW-3 | None | N/A |
| Leaky Transformer | PCB Wipe Sample CH082511SW-4 | None | 4, 5 |
| Bay 1 | PCB Wipe Sample CH082511SW-5 | None | N/A |
| Bay 4 | PCB Wipe Sample CH082511SW-6 | None | N/A |
| Bay 2 | PCB Wipe Sample CH082511SW-7 | None | 7 |
| Bay 3 | PCB Wipe Sample CH082511SW-8 | None | 8 |

The inspectors observed 2 leaking transformers in Clean Harbors' Container Storage Warehouse. The first transformer, located in Bay 4, had "330 ppm" written on the side of the transformer (see Photos 4 and 5). EPA collected a PCB wipe sample of the oil on the day of the inspection (Sample CH082511SW-4). However, according to the analytical results, EPA only detected PCBs at 6.5 μ g/100 cm². The action level for PCB wipe samples under TSCA is 10 μ g/100 cm². The second leaky transformer was marked as "6 ppm" and was stored in a containment unit in the non-PCB (<50 ppm) storage area of the warehouse.



Photo 4 - Transformer Marked as "330 ppm"



Photo 5 - Liquid on Floor & Pallet

The inspectors observed a metal drum (Drum #24612696) in Bay 3 of the Container Storage Warehouse that had "Assume >500" written on the drum lid by the generator, but did not have a PCB M_L label affixed (see Photo 6). EPA asked that Clean Harbors provide EPA with analytical and profile information for the drum. On October 4, 2011, Clean Harbors sent EPA the requested information (Attachment 4), including laboratory results showing no detectable levels of PCBs in the drum contents.



Photo 6 – Drum #24612696 Marked "Assume > 500"

The inspectors observed 2 big stains on the floor near Clean Harbors's electrical pump in Bay 2 (see Photo 7). EPA collected a PCB wipe sample over one of the stains (Sample CH082511SW-7). According to the analytical results, EPA only detected PCBs at .06 μ g/100 cm². The inspectors also observed significant staining and residue in the gutter area of Bay 3 (see Photo 8). EPA collected a PCB wipe sample in the gutter area (Sample CH082511SW-8). According to the analytical results, EPA only detected PCBs at .2 μ g/100 cm².



Photo 7: Wipe Sample Near Pump in Bay 2



Photo 8: Wipe Sample in Dirty Gutter in Bay 3

A total of eight surface wipes (CH082511SW-1 to CH082511SW-8) were collected inside the Container Storage Warehouse. None of the wipe samples exceeded the threshold for unrestricted use under TSCA ($10 \mu g/100 \text{ cm}^2$).

Area 3: Onsite Laboratory

| Location | Waste Type | Potential Violation | Photo |
|---|----------------------------------|---------------------|-------|
| Lab Hood #1 PCB Wipe Sample CH082511SW-9 | | N/A – Field Blank | N/A |
| Lab Hood #1 | PCB Wipe Sample CH082511SW-10 | None | N/A |
| Lab Hood #2 | PCB Wipe Sample CH082511SW-11 | None | N/A |

The inspectors observed 3 containers in the temporary PCB storage area inside the Laboratory (see Photos 9 and 10). A white container, partially filled with PCB oil, was not marked with a PCB M_L label as required. The drum also should be labeled as CA-only hazardous waste. Clean Harbors affixed the appropriate labels prior to the end of the inspection.





Photo 10: White PCB Container Not Properly Labeled

Photo 9: Laboratory PCB Storage Area

A total of three surface wipes (CH082511SW-9 to CH082511SW-11) were collected inside the Laboratory. The analytical results of the wipes were non-detect for PCBs.

Record Review

The inspectors requested that Clean Harbors subsequently provide EPA with an inventory of PCB items on site at the time of the inspection, analytical and profile information for drum 24612696, and analytical information and manifest(s) from decontamination of a PCB tank earlier in the year. Clean Harbors provided the requested information on October 4, 2011 (Attachment 4).

Potential Violation of TSCA PCB Requirements

1. Failure to Mark PCBs and PCB Items [40 C.F.R. § 761.40(a)(1)].

Requirements:

TSCA requirement 40 C.F.R. § 761.40(a)(1) states each [PCB Containers] in existence on or after July 1, 1978 shall be marked as illustrated in Figure 1 in § 761.45(a): The mark illustrated in Figure 1 is referred to as M_L throughout this subpart.

Findings:

During the inspection, EPA observed a container of PCB oil in the laboratory which was not properly marked with a PCB M_L label as required under TSCA.

Facility Response:

Clean Harbors documented its return to compliance by affixing a PCB M_L label to the container prior to the end of the inspection. Clean Harbors also re-trained their TSCA facility laboratory teams on all waste standards of operation, including waste container labeling requirements, subsequent to the inspection.

List of Attachments

- 1. Inspection Photo Log
- 2. EPA Region 9 Laboratory Analytical Testing Results
- 3. TSCA Inspection Forms
 - a. Notice of Inspection
 - b. TSCA Inspection Confidentiality Notice
 - c. Receipt for Samples and Documents
 - d. Chain of Custody Record
- 4. Clean Harbors October 4, 2011 Correspondence

ATTACHMENT 1

Photograph Log for EPA's August 25, 2011 Clean Harbors Los Angeles TSCA Inspection

All photographs on this log were taken with a Olympus Tough TG-310 digital camera by Christopher Rollins or Jennifer Downey, RCRA Enforcement Office, EPA Region IX. Please note that each photograph number listed below begins with "P82500".

- 01. Sign located at the front of the facility
- 02. Drums in Truck Loading Dock area
- 03. Close-up of drum in Truck Loading Dock area
- 04. Hazardous waste label on drum in Truck Loading Dock area (8/24/11 accumulation start date)
- 05. Top of drum showing out of service date in Truck Loading Dock area
- 06. Drums in Truck Loading Dock area
- 07. Top of drum showing out of service date in Truck Loading Dock area
- 08. Clean Harbors Supplemental Drum Label on drum in Truck Loading Dock area
- 09. Hazardous waste container near entrance to Container Storage Warehouse
- 10. Drums near front of Container Storage Warehouse
- 11. Labels on a drum near the front of Container Storage Warehouse
- 12. Labels on a drum near the front of Container Storage Warehouse
- 13. Leaking "330 ppm" transformer
- 14. Liquid and stains below "330 ppm" leaking transformer
- 15. Liquid and stains below "6 ppm" leaking transformer
- 16. "6 ppm" leaking transformer
- 17. Transformers and containers in TSCA area of Container Storage Warehouse
- 18. Transformers and containers in TSCA area of Container Storage Warehouse
- 19. Transformers and containers in TSCA area of Container Storage Warehouse
- 20. Transformers and containers in TSCA area of Container Storage Warehouse
- 21. Labels and markings on top of TSCA regulated item in Container Storage Warehouse

- 22. Hazardous waste labels on non-TSCA PCB items in Container Storage Warehouse
- 23. Labels on container of potentially PCB contaminated debris in Container Storage Warehouse
- 24. Drum in Bay 3 of Container Storage Warehouse
- 25. Drum #24612696 in Bay 3 of Container Storage Warehouse
- 26. Hazardous waste label on drum in Container Storage Warehouse
- 27. PCB label on small container in Container Storage Warehouse
- 28. PCB pump and equipment in Bay 2
- 29. EPA wipe sample CH082511SW-1
- 30. EPA wipe sample CH082511SW-2
- 31. EPA wipe sample CH082511SW-3
- 32. Clean Harbors wipe sample next to CH082511SW-3
- 33. EPA wipe sample CH082511SW-4
- 34. Clean Harbors wipe sample next to CH082511SW-4
- 35. EPA wipe sample CH082511SW-5
- 36. EPA wipe sample CH082511SW-6
- 37. EPA wipe sample CH082511SW-7
- 38. PCB hose and staining on floor in Bay 2
- 39. EPA wipe sample CH082511SW-8
- 40. After EPA wipe sample CH082511SW-8
- 41. Drums in Bay 3 of Container Storage Warehouse
- 42. Step can filled with potentially PCB contaminated gloves in Laboratory
- 43. Containers in Laboratory temporary PCB storage area
- 44. Containers in Laboratory temporary PCB storage area
- 45. EPA wipe sample CH082511SW-10
- 46. EPA wipe sample CH082511SW-11



P8250001

P8250006

P8250011

P8250016

P8250021

P8250026

P8250031



P8250002



P8250003

Links



P8250004

P8250009



P8250005



P8250010



P8250015



P8250020



P8250025



P8250030



P8250035





P8250012



P8250017



P8250022



P8250027



P8250032



P8250008

P8250013



P8250014



P8250019



P8250024



P8250029



P8250034















P8250036



P8250037



P8250038



P8250039



P8250040



P8250045





P8250042



P8250043



P8250044



P8250046

| Attachment 2 | 1108070 FINAL 09 22 11 1535 |
|--------------|--|
| STATED STATE | United States Environmental Protection Agency Region 9 Laboratory 1337 S. 46th Street Building 201 Richmond, CA 94804 |
| Date: | 9/22/2011 |
| Subject: | Analytical Testing Results - Project R11R08 SDG: 11238B |

From:

Brenda Bettencourt, Director EPA Region 9 Laboratory MTS-2 Jennifer Downey

RCRA Enforcement Office

WST-3

To:

Attached are the results from the analysis of samples from the **Ciean Harbors Los Angeles 2011 TSCA inspection** project. These data have been reviewed in accordance with EPA Region 9 Laboratory policy.

A full documentation package for these data, including raw data and sample custody documentation, is on file at the EPA Region 9 Laboratory. If you would like to request additional review and/or validation of the data, please contact Eugenia McNaughton at the Region 9 Quality Assurance Office.

If you have any questions, please ask for Richard Bauer, the Lab Project Manager at (510)412-2300.

Analyses included in this report:

PCB Aroclors by GC/ECD

PCB Arociors by GC/ECD

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United States Environmental Protection Agen

Region 9 Laboratory

1337 S. 46th Street, Building 201, Richmond, CA 94804 Phone:(510) 412-2300 Fax:(510) 412-2302

Project Manager: Jennifer Downey Project Number: R11R08 Project: Clean Harbors Los Angeles 2011 TSCA Inspection RCRA Enforcement Office 75 Hawthorne Street San Francisco CA, 94105 SDG: 11238B Reported: 09/22/11 15:35

ANALVIICAL REPORT FOR SAMPLES

| Sample 1D | Laboratory 1D | Matrix | Date Collected | Date Received |
|---------------|---------------|--------|----------------|----------------|
| CH082511SW-1 | . 1108070-01 | Wipe | 08/25/11 13:16 | 08/26/11 11:00 |
| CH082511SW-2 | 1108070-02 | Wipe | 08/25/11 13:21 | 08/26/11 11:00 |
| CH082511SW-3 | 1108070-03 | Wipe | 08/25/11 13:24 | 08/26/11 11:00 |
| CH082511SW-4 | 1108070-04 | Wipe | 08/25/11 13:32 | 08/26/11 11:00 |
| CH082511SW-5 | 1108070-05 | Wipe | 08/25/11 13:40 | 08/26/11 11:00 |
| CH082511SW-6 | 1108070-06 | Wipe | 08/25/11 13:44 | 08/26/11 11:00 |
| CH082511SW-7 | 1108070-07 | Wipe | 08/25/11 13:53 | 08/26/11 11:00 |
| CH082511SW-8 | 1108070-08 | Wipe | 08/25/11 14:00 | 08/26/11 11:00 |
| CH082511SW-9 | 1108070-09 | Wipe | 08/25/11 14:38 | 08/26/11 11:00 |
| CH082511SW-10 | 1108070-10 | Wipe | 08/25/11 14:44 | 08/26/11 11:00 |
| CH082511SW-11 | 1108070-11 | Wipe | 08/25/11 14:51 | 08/26/11 11:00 |
| | | | | |

SDG ID 11238B

<u>PCB wipe extraction</u>: Wipes were transferred from the sample vial to soxhlet extraction apparatus. The sample vials were subsequently rinsed with dichloromethane and the rinsate added to the soxhlet. Sample wipes 1108070-01 through -08 were soiled with black stains, and wipes -09 through -11 appeared clean. Samples -04, -06, and -08 contained smail debris particles.

<u>Surrogate spike compounds</u>: Tetrachloro-m-xylene and decachlorobiphenyl were added to each wipe sample as surrogate standards. Only decachlorobiphenyl was evaluated for QC flagging. Tetrachloro-m-xylene is used as a secondary surrogate and only evaluated when the presence of decachlorobiphenyl is suspected in the sample itself (as when aroclor 1268 is present in the sample).

Reporting units: All results are reported in ug/100 cm2, based on the assumption that a 100 cm2 area was wiped.

Work Order(s)

1108070



nited States Environmental Protection Agency

Region 9 Laboratory

1337 S. 46th Street, Building 201, Richmond, CA 94804 Phone:(510) 412-2300 Fax:(510) 412-2302

Project Manager: Jennifer Downey Project Number: R11R08

Project: Clean Harbors Los Angeles 2011 TSCA Inspection

RCRA Enforcement Office 75 Hawthorne Street

SDG: 11238B

San Francisco CA, 94105

Reported: 09/22/11 15:35

Sample Results

| Analyte | * | Reanalysis / Extract | Result | Qualifiers / Comments | Quantitation Limit | Units | Batch | Prepared | Analyzed | Method |
|-----------------|-------------------|-----------------------------|--------|--------------------------|-----------------------|-----------------------|---------|---------------|---------------|--------------------|
| Lab ID: | 1108070-01 | | | 1.1 | | | | WI | pe - Sample | ed: 08/25/11 13:16 |
| Sample 1D: | CH082511SW-1 | | | | | | Poly | chlorinated B | iphenyls by l | EPA Method 8082A |
| Aroclor 1016 | | | ND | U | 0.1 | ug/100cm ² | B1H0152 | 08/30/11 | 09/01/11 | 8082A/SOP335 |
| Aroclor 1221 | | | ND | U | 0.2 | " | " | | " | 8082A/SOP335 |
| Aroclor 1232 | | | ND | U | 0.1 | * | | | " | 8082A/SOP335 |
| Aroclor 1242 | | | ND | U | 0.1 | * | | | " | 8082A/SOP335 |
| Aroclor 1248 | | | ND | U | 0.1 | • 1 | | | | 8082A/SOP335 |
| Aroclor 1254 | | | ND | U | 0.1 | | | | . " | 8082A/SOP335 |
| Aroclor 1260 | | | ND | J, Q2, U | 0.1 | | " | | | 8082A/SOP335 |
| Aroclor 1262 | | | ND | U | 0.1 | | | " | See." | 8082A/SOP335 |
| Aroclor 1268 | | | ND | U | 0.1 | " | . " | | | 8082A/SOP335 |
| Surrogate: Tetr | rachloro-m-xylene | | | 89 % | 88.8-128% | | " | " | " | |
| Surrogate: Dec | cachlorobiphenyl | | | 80 % | 47.4-136% | | n | | | |
| Lab ID: | 1108070-02 | | - | | | | | Wi | pe - Sample | d: 08/25/11 13:21 |
| Sample ID: | CH082511SW-2 | *. | | | | | Poly | chlorinated B | iphenyis by i | EPA Method 8082A |
| Aroclor 1016 | | | ND | U | 0.1 | ug/100cm ^a | B1H0152 | 08/30/11 | 09/01/11 | 8082A/SOP335 |
| Aroclor 1221 | | an and an and a second free | ND | U | 0.2 | | | | | 8082A/SOP335 |
| Aroclor 1232 | | | ND | U | 0.1 | | " | " | | 8082A/SOP335 |
| Aroclor 1242 | | | ND | U | 0.1 | | " | · · | н | 8082A/SOP335 |
| Aroclor 1248 | | | ND | U | 0.1 | | | ۳ | - | 8082A/SOP335 |
| Aroclor 1254 | | | ND | U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1260 | | | ND | J, Q2, U | 0.1 | | | n | | 8082A/SOP335 |
| Aroclor 1262 | | | ND | U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1268 | | | ND | U | . 0.1 | | | * | " | 8082A/SOP335 |
| Surrogate: Tetr | rachloro-m-xylene | | | 91 % | 88.8-128% | | | " | | |
| Surrogate: Dec | achlorobiphenyl | | | 82 % | 47.4-136% | | " | " | | |
| Lab ID: | 1108070-03 | | | | | 6-1-8 | | Wi | pe - Sample | d: 08/25/11 13:24 |
| Sample 1D: | CH082511SW-3 | | | | | | Poly | chlorinated B | lphenvis by F | EPA Method 8082A |
| Aroclor 1016 | | | ND | U | 0.1 | ug/100cm ² | B1H0152 | 08/30/11 | 09/01/11 | 8082A/SOP335 |
| Aroclor 1221 | | | ND | U | 0.2 | " | " | | • | 8082A/SOP335 |
| Aroclor 1232 | | | . ND | U | 0.1 | . . | | | | 8082A/SOP335 |
| Aroclor 1242 | | | ND | U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1248 | | | NĎ | U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1254 | | | ND | U | 0.1 | n | | • | • | 8082A/SOP335 |
| Aroclor 1260 | | (1.14) | ND | J, Q2, U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1262 | | | ND | U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1268 | | | ND | U | 0.1 | | | | | 8082A/SOP335 |



United States Environmental Protection Agen-

Region 9 Laboratory

1337 S. 46th Street, Building 201, Richmond, CA 94804 Fax:(510) 412-2302 Phone:(510) 412-2300

Project Manager: Jennifer Downey Project Number: R11R08

Project: Clean Harbors Los Angeles 2011 TSCA Inspection

RCRA Enforcement Office 75 Hawthorne Street San Francisco CA, 94105

SDG: 11238B Reported: 09/22/11 15:35

Sample Results

| Analyte | 78 | Reanalysis / Extract | Result | Qualifiers / Comments | Quantitation Limit | Units | Batch | Prepared | Analyzed | Method |
|-----------------|-------------------|-------------------------|--------|--------------------------|-----------------------|-----------------------|---------|---------------|-------------------|--------------------|
| Lab ID: | 1108070-03 | | | | | | | WI | pe - Sample | ed: 08/25/11 13:24 |
| Sample 1D: | CH082511SW-3 | | | | | | Poly | chlorinated B | lphenyls by | EPA Method 8082A |
| Surrogate: Tetr | achloro-m-xylene | | | 92 % | 88.8-128% | | B1H0152 | 08/30/11 | 09/01/11 | |
| Surrogate: Dec | achlorobiphenyl | | | 84 % | 47.4-136% | | " | " | " | |
| Lab ID: | 1108070-04 | | | | | | | WI | pe - Sample | ed: 08/25/11 13:32 |
| Sample 1D: | CH082511SW-4 | | | | | | Poly | chlorinated B | phenyls by | EPA Method 8082A |
| Aroclor 1016 | | | ND | U U | 0.1 | ug/100cm ² | B1H0152 | 08/30/11 | 09/01/11 | 8082A/SOP335 |
| Aroclor 1221 | | | NE | U | 0.2 | | " | | | 8082A/SOP335 |
| Aroclor 1232 | | | NE | υ | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1242 | • | | NE | U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1248 | | | NE | U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1254 | | | NE | υ | 0.1 | " | 11 | | | 8082A/SOP335 |
| Aroclor 1260 | | REI | 6.5 | | 0.5 | n | | 0 | 09/07/11 | 8082A/SOP335 |
| Aroclor 1262 | | | ND | υ | 0.1 | | | | 09/01/11 | 8082A/SOP335 |
| Aroclor 1268 | | | NE | υ | 0.1 | | " | " | " | 8082A/SOP335 |
| Surrogate: Tetr | achloro-m-xylene | | | 81 % | 88.8-128% | | " | 11 | | |
| Surrogate: Dec | achlorobiphenyl | | . * | 75 % | 47.4-136% | | " | " | " | |
| Lab 1D: | 1108070-05 | | | | | | | WI | pe - Sample | ed: 08/25/11 13:40 |
| Sample 1D: | CH082511SW-5 | - 10 C | | | | | Poly | chiorinated B | lphenyls by | EPA Method 8082A |
| Aroclor 1016 | | | NE | U | 0.1 | ug/100cm ² | B1H0152 | 08/30/11 | 09/01/11 | 8082A/SOP335 |
| Aroclor 1221 | | | NE | U | 0.2 | | " | | | 8082A/SOP335 |
| Aroclor 1232 | | | NE | U | 0.1 | | | " | | 8082A/SOP335 |
| Aroclor 1242 | | | ND | U | 0.1 | | n | | | 8082A/SOP335 |
| Aroclor 1248 | | | ND | υ | 0.1 | | 15:00 . | | and * 1255 | 8082A/SOP335 |
| Aroclor 1254 | | | NE | υ | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1260 | | | NE | J, Q2, U | 0.1 | н. | | | | 8082A/SOP335 |
| Aroclor 1262 | | | NE | U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1268 | | | ND | U | 0.1 | н | | | | 8082A/SOP335 |
| Surronate: Tete | racklono m volana | | | 89 % | RR 8_178% | | - | | | |

| Surrogate: Decachlorobiphenyl | | 81 % | 47.4-136% | | " | " | " | |
|-------------------------------|-----|------|-----------|-----------------------|---------|---------------|-------------|---------------------|
| Lab ID: 1108070-06 | • | | | | | WI | pe - Sampl | led: 08/25/11 13:44 |
| Sample ID: CH082511SW-6 | | | | | Polv | chlorinated B | iphenvis by | EPA Method 8082A |
| Aroclor 1016 | ND | U | 0.1 | ug/100cm ² | B1H0152 | 08/30/11 | 09/01/11 | 8082A/SOP335 |
| Aroclor 1221 | ND | υ | 0.2 | | | | | 8082A/SOP335 |
| Aroclor 1232 | 0.4 | | 0.1 | | " | | " | 8082A/SOP335 |
| Aroclor 1242 | ND | U | 0.1 | | | | 0 | 8082A/SOP335 |
| Arocior 1248 | ND | U | 0.1 | | | * | | 8082A/SOP335 |
| Aroclor 1254 | ND | U | 0.1 | | | | | 8082A/SOP335 |



-

nited States Environmental Protection Agency **Region 9 Laboratory**

1337 S. 46th Street, Building 201, Richmond, CA 94804 Fax:(510) 412-2302 Phone:(510) 412-2300

Project Manager: Jennifer Downey Project Number: R11R08 Project: Clean Harbors Los Angeles 2011 TSCA Inspection

RCRA Enforcement Office 75 Hawthorne Street San Francisco CA, 94105

SDG: 11238B Reported: 09/22/11 15:35

| Sample R | esults | | | | | | | | | |
|------------------|-------------------|-------------------------|--------|--------------------------|-----------------------|-----------------------|---------|----------------|--------------|--------------------|
| Analyte | | Reanalysis / Extract | Result | Qualifiers / Comments | Quantitation Limit | Units | Batch | Prepared | Analyzed | Method |
| Lab ID: | 1108070-06 | | | | | | | WI | pe - Sample | ed: 08/25/11 13:44 |
| Sample 1D: | CH082511SW-6 | | - | | | | Poly | chlorinated B | phenyls by | EPA Method 8082A |
| Aroclor 1260 | | * | ND | J, Q2, U | 0.1 | ug/100cm ² | B1H0152 | 08/30/11 | 09/01/11 | 8082A/SOP335 |
| Aroclor 1262 | | | ND | U | 0.1 | H | | M | | 8082A/SOP335 |
| Aroclor 1268 | | | ND | U | 0.1 | | | 'n | n | 8082A/SOP335 |
| Surrogate: Tetra | achloro-m-xylene | | | 89 % | 88.8-128% | | * | " | - | |
| Surrogate: Deca | achlorobiphenyl | | | 87 % | 47.4-136% | | n | " | n | |
| Lab 1D: | 1108070-07 | | | | | | | WI | pe - Sampl | ed: 08/25/11 13:53 |
| Sample 1D: | CH082511SW-7 | | | | | | Poly | chiorinated B | iphenyls by | EPA Method 8082A |
| Aroclor 1016 | | | ND | υ | 0.1 | ug/100cm ³ | B1H0152 | 08/30/11 | 09/02/11 | 8082A/SOP335 |
| Aroclor 1221 | | | ND | U | 0.2 | n | H 10 | " | " | 8082A/SOP335 |
| Aroclor 1232 | | | ND | U | 0.1 | | " | н | " | 8082A/SOP335 |
| Aroclor 1242 | | | NE | U | 0.1 | | | n | | 8082A/SOP335 |
| Aroclor 1248 | | | NE | U | . 0.1 | | * | n | " | 8082A/SOP335 |
| Aroclor 1254 | | | ND | U | 0.1 | | | " | | 8082A/SOP335 |
| Aroclor 1260 | | | 0.06 | ; C1, J, Q2 | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1262 | | | NE | U | 0.1 | | | | H | 8082A/SOP335 |
| Aroclor 1268 | | | NE | U | 0.1 | | | | | 8082A/SOP335 |
| Surrogate: Tetr | achloro-m-xylene | | | 90 % | 88.8-128% | | " | | | |
| Surrogate: Dec | achlorobiphenyl | | | 81 % | 47.4-136% | | | " | " | |
| Lab ID: | 1108070-08 | | | | | | 4 4 | W | pe - Sampl | ed: 08/25/11 14:00 |
| Sample 1D: | CH0825115W-8 | | | | | | Poly | chlorinated E | Siphenyis by | EPA Method 8082A |
| Aroclor 1016 | in in the state | | NE | U | 0.1 | ug/100cm ² | B1H0152 | 08/30/11 | 09/02/11 | 8082A/SOP335 |
| Aroclor 1221 | | | NE | D U | 0.2 | | " | * | " | 8082A/SOP335 |
| Aroclor 1232 | | | NE | U | 0.1 | ** | | | | 8082A/SOP335 |
| Aroclor 1242 | | | N | U | 0.1 | 11 | | | | 8082A/SOP335 |
| Aroclor 1248 | | | NE | D U | 0.1 | | n | | | 8082A/SOP335 |
| Aroclor 1254 | | | N | U | 0.1 | | | * | | 8082A/SOP335 |
| Aroclor 1260 | | | 0.3 | 2 J, Q2 | 0.1 | 20 m | | | | 8082A/SOP335 |
| Aroclor 1262 | | | N | U | 0.1 | | в | " | | 8082A/SOP335 |
| Aroclor 1268 | | | NI | υ | 0.1 | | | | | 8082A/SOP335 |
| Surrogate: Tetr | rachloro-m-xylene | | | 95 % | 88.8-128% | | " | | . * | |
| Surrogate: Dec | cachlorobiphenyl | | | 80 % | 47.4-136% | | " | ". | " | |
| Lab ID: | 1108070-09 | | | | | | | w | lpe - Sampl | ed: 08/25/11 14:38 |
| Sample 1D: | CH082511SW-9 | | | à | | | Pot | ychlorinated B | Siphenyls by | EPA Method 8082A |
| Aroclor 1016 | | | N | 5 U | 0.1 | ug/100cm ² | B1H0152 | 08/30/11 | 09/02/11 | 8082A/SOP335 |
| Aroclor 1221 | | | N | U C | 0.2 | " | | " | | 8082A/SOP335 |
| Aroclor 1232 | | | NI | D U | 0.1 | " | " | | | 8082A/SOP335 |

1102070 FINAL 09 22 11 1535



United States Environmental Protection Agen Region 9 Laboratory

 1337 S. 46th Street, Building 201, Richmond, CA
 94804

 Phone:(510) 412-2300
 Fax:(510) 412-2302

Project Manager: Jennifer Downey Project Number: R11R08 Project: Clean Harbors Los Angeles 2011 TSCA

Inspection

RCRA Enforcement Office 75 Hawthorne Street San Francisco CA, 94105

SDG: 11238B Reported: 09/22/11 15:35

Sample Results

| Analyte | | Reanalysis / Extract Result | Qualifiers / Comments | Quantitation Limit | Units | Batch | Prepared | Analyzed | Method |
|------------------|-------------------|--------------------------------|--------------------------|-----------------------|-----------------------|---------|----------------|---------------|--------------------|
| Lab ID: | 1108070-09 | | | | | | W | lpe - Sampl | ed: 08/25/11 14:38 |
| Sample 1D: | CH082511SW-9 | | | | to | Pol | ychlorinated E | Siphenyls by | EPA Method 8082A |
| Aroclor 1242 | | NE | D U | 0.1 | ug/100cm ² | B1H0152 | 08/30/11 | 09/02/11 | 8082A/SOP335 |
| Aroclor 1248 | | NE | D U | 0.1 | | | n | | 8082A/SOP335 |
| Aroclor 1254 | | NE | D U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1260 | | NE |) J, Q2, U | 0.1 | n | | | | 8082A/SOP335 |
| Aroclor 1262 | | NE | U U | 0.1 | | | ٠ | | 8082A/SOP335 |
| Aroclor 1268 | | NE | D U | 0.1 | | | " | | 8082A/SOP335 |
| Surrogate: Teti | rachloro-m-xylene | | 92 % | 88.8-128% | | " | " | | 6 - 40 |
| Surrogate: Dec | achlorobiphenyl | | 80 % | 47.4-136% | | " | | | |
| Lab ID: | 1108070-10 | | | | | | Wi | pe - Sample | ed: 08/25/11 14:44 |
| Sample 1D: | CH082511SW-10 | | | | | Poly | chlorinated B | iphenvis by i | EPA Method 8082A |
| Aroclor 1016 | | ND | U | 0.1 | ug/100cm ² | B1H0152 | 08/30/11 | 09/02/11 | 8082A/SOP335 |
| Aroclor 1221 | | ND |) U | 0.2 | " | | | | 8082A/SOP335 |
| Aroclor 1232 | | ND |) U . | 0.1 | | | " | | 8082A/SOP335 |
| Aroclor 1242 | | NŖ | U | 0.1 | " | | * | | 8082A/SOP335 |
| Aroclor 1248 | | ND | U | 0.1 | H | | в., | | 8082A/SOP335 |
| Aroclor 1254 | | ND | υ | 0.1 | ۳ | н | n | | 8082A/SOP335 |
| Aroclor 1260 | | ND | J, Q2, U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1262 | | ND | U | 0.1 | R | | | | 8082A/SOP335 |
| Aroclor 1268 | | ND | U | 0.1 | π | | | " | 8082A/SOP335 |
| Surrogate: Tetr | achloro-m-xylene | | 91 % | 88.8-128% | | | | | |
| Surrogate: Dec | achlorobiphenyl | a transmission and the street | 81 % | 47.4-136% | | | | " | |
| Lab ID: | 1108070-11 | | | | | | Wl | e - Sample | d: 08/25/11 14:51 |
| Sample 1D: | CH082511SW-11 | | | | | Poly | chlorinated Bl | phenyls by F | PA Method 8082A |
| Aroclor 1016 | | ND | U | 0.1 | ug/100cm ² | B1H0152 | 08/30/11 | 09/02/11 | 8082A/SOP335 |
| Aroclor 1221 | | ND | U | 0.2 | | H | | | 8082A/SOP335 |
| Aroclor 1232 | | ND | U . | 0.1 | " | " | н | | 8082A/SOP335 |
| Aroclor 1242 | | ND | U | 0.1 | " | n | | | 8082A/SOP335 |
| Aroclor 1248 | | ND | U | 0.1 | | " | | | 8082A/SOP335 |
| Aroclor 1254 | | ND | U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1260 | | ND | J, Q2, U | 0.1 | | | | | 8082A/SOP335 |
| Aroclor 1262 | | ND | U | 0.1 | " | 9 | n 3 | | 8082A/SOP335 |
| Aroclor 1268 | | ND | U | 0.1 | | | | " | 8082A/SOP335 |
| Surrogate: Tetra | achloro-m-xylene | | 90 % | 88.8-128% | | | " | " | |
| Surrogate: Deca | achlorobiphenyl | | 83 % | 47.4-136% | | " | " | | |



nited States Environmental Protection Agency

Region 9 Laboratory

1337 S. 46th Street, Building 201, Richmond, CA 94804 Phone:(510) 412-2300 Fax:(510) 412-2302

Project Manager: Jennifer Downey Project Number: R11R08

Project: Clean Harbors Los Angeles 2011 TSCA

Inspection

RCRA Enforcement Office 75 Hawthorne Street

San Francisco CA, 94105

SDG: 11238B Reported: 09/22/11 15:35

Quality Control

| Analyte | Result | | Qualifiers / Comments | Quantitation Limit | | Units | Spike Level | Source Result | %REC | %REC | RPD RPD |
|---|--------|--------|--------------------------|-----------------------|-----|---------|----------------|------------------|------------|------------------|-------------------|
| Batch B1H0152 - Soxhlet Extraction - PCBs | | | | 4 | | | 10 00 00 | - | | Linns | Limit |
| Blank (B1H0152-BLK1) | | | | | | | Polyablasi | | Prep | ared: 08/30/11 A | nalyzed: 09/01/11 |
| Aroclor 1016 | | | | | | | 1 oryculorin | ated Bipher | iyls by EP | A Method 8082/ | - Quality Contro |
| - | ND | | U | 0 | | ug/100c | | | | | |
| Aroclor 1221 | ND | | | | | m² | | | | | * |
| Aroclor 1232 | | | U | 0. | 2 | N | | | | | |
| Aroclor 1242 | ND | | U | 0. | L | n | | | | | |
| Arociar 1248 | ND | | U | 0. | 1 | н | | | | | |
| Arocior 1254 | ND | | U | 0. | 1 | N | | | | | |
| Aroclor 1260 | ND | | U | 0,1 | ı | н | | | | | |
| Aroclor 1262 | ND | | J, Q2, U | 0.1 | I. | n | | | | | |
| Aroclor 1268 | ND | | U | . 0.1 | 1 | | | | | | |
| | ND | - 10 C | U | 0.1 | | | | | | | |
| Surrogate: Tetrachloro-m-xylene | | | | | | | | | - | | |
| Surrogate: Decachlorobiphenvl | | 0.180 | | | | " | 0.200 | | 00 | | |
| LCS (B1H0152-BS1) | | 0.167 | | | | " | 0.200 | | 90 | aa.a-128 | |
| Aroclor 1016 | | | | | - | | 0.200 | | 84 | 47.4-136 | |
| | 0.892 | | | 0.1 | | /100- | 1.00 | | | | |
| roclor 1260 | 0.047 | | | | | | 1.00 | | 89 | 88.6-139 | 200 |
| | 0.847 | | | 0.1 | - 8 | - 1 - + | 1.00 | | 84 | 96 6 130 | |
| urrogate: Tetrachloro-m-xylene | | | | | | | | | 0.3 | 00.3-139 | 200 |
| wrogate Descellam bi-ton t | | 0.175 | | | | | 0 200 | | | | |
| Sance Decachiorooipneny! | | 0.167 | | | | | 0.200 | | 88 | 88.8-128 | |
| | | | | | _ | | 0.200 | | 84 | 47.4-136 | |

.



United States Environmental Protection Agency

Region 9 Laboratory

1337 S. 46th Street, Building 201, Richmond, CA 94804 Phone:(510) 412-2300 Fax:(510) 412-2302

 Project Manager: Jennifer Downey
 RCRA Enforcement Office
 SDG: 11238B

 Project Number: R11R08
 75 Hawthorne Street
 Reported: 09/22/11 15:35

 Project: Clean Harbors Los Angeles 2011 TSCA
 San Francisco CA, 94105
 09/22/11 15:35

Qualifiers and Comments

- Q2 The laboratory control standard associated with this sample did not meet recovery criteria for this analyte (see LCS results for this batch in QC summary).
 - J The reported result for this analyte should be considered an estimated value.
- C1 The reported concentration for this analyte is below the quantitation limit.
- U Not Detected
- NR Not Reported
- RE1, RE2, etc: Result is from a sample re-analysis.

| The public reporting burdle for the contrast is according to burdle status of any other and only the contrast of any other according of high burdle status of any other and other according of high burdle status of any other according to be being used to the according to burdle status of the other according to burdle status of the other according to burdle status of the other according to burdle status of the according to burdle status of the other according to burdle status of the according to accord the according to accord to burdle status of the according to accord | |
|--|----------|
| Investigation Identification Investigation Investigation Identification Investigation Investigati | |
| SEPA Region 9-75 Hawtherne St. SF 756 Alba Street ST56 Alba Street ST66 Alba Street ST66 Alba Street ST66 Alba Street ST66 Alba Street ST66 Alba Stre | uc |
| BEASON FOR INSPECTION Under the authority of Section 11 of the Toxic Substances Control Act: For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activity establishment, facility, or other premises in which chemical substances or mitures or articles containing same are manufe processed or stored, or heid before or after their distribution in commerce (including records, files, papers, processes, control, regulisments of the Act applicable to the chemical substances, mixtures, or articles containing same in com with their distribution in commerce (including records, files, papers, processes, control, and their distribution in commerce (including records, files, papers, processes, control, and their distribution in commerce (including records, files, papers, processes, control, and their distribution in commerce (including records, files, papers, processes, control, and their distribution in commerce (including records, files, papers, processes, control, and their distribution in commerce (including records, files, papers, processes, control, and their distribution in commerce (including records, files, papers, processes, control, and their distribution in commerce (including records, files, papers, processes, control, and their distribution in commerce (including records, files, papers, processes, control, and their distribution of control at a specified and their distribution of a such data specified in D. Personnel data | • |
| Under the authority of Section 11 of the Toxic Substances Control Act: For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activity establishment, facility, or other promises in which chemical substances or mixtures or articles containing same are manufe processed or stored, or held before or start their distribution in commerce (including records, files, papers, processes, control and any conveyance being used to transport chemical substances, mixtures, or articles containing same in con with their distribution in commerce (including records, files, papers, processes, control and any conveyance being used to transport chemical substances, mixtures, or articles within or associated with such prev conveyance have been complied with. In addition, this inspection extends to (<i>Check appropriate blocka</i>): A. Financial data B. Sales data C. Pricing data The nature and extent of inspection of such data specified in A through E above is as follows: Lestify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge Knowingly false or misseding statement may be pulsibable by files or impression. | |
| For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activity for other premises in which chemical substances or mixtures or articles containing same are manufer processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, control their distribution in commerce (including records, files, papers, processes, control, and facilities) bearing on which their distribution in commerce (including records, files, papers, processes, control, and facilities) bearing on where their distribution in commerce (including records, files, papers, processes, control, and facilities) bearing on where their distribution in commerce (including records, files, papers, processes, control, and facilities) bearing on where their distribution in commerce (including records, files, papers, processes, control, and facilities) bearing on where their distribution in commerce (including records, files, papers, processes, control, and facilities) bearing on where their distribution in commerce (including the papers, processes, control, and facilities) bearing on where on equivalence have been compiled with. in addition, this inspection extends to (Check appropriate blocks): D. Personnel data B. Sales data E. Research data C. Pricing data E. Research data The nature and extent of inspection of such data specified in A through E above is as follows: Interfacetion Certification Certification Certification Interview of the statements i have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge whore the statements in may be punishable by fine or imprisonment or | |
| A. Financial data D. Personnel datatachrenel bata D. Personnel data personellabatatatatatatatatat | her the |
| B. Sales data C. Pricing data C. Pricing data The nature and extent of inspection of such data specified in A through E above is as follows: | |
| C. Pricing data The nature and extent of inspection of such data specified in A through E above is as follows: I certify that the statements i have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge knowingly false or misleading statement may be punishable by fine or impirate applicable law. Sector Signature Recipient Signature Recipient Signature | |
| The nature and extent of inspection of such data specified in A through E above is as follows: Certification i certify that the statements i have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge knowledge false or misleading statement may be punishable by fine or implement or both under applicable law. | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge knowingly failse or misleading statement may be punishable by fine or imprisonment or both under applicable law. Pector Signature | |
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| Certification i certify that the statements i have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. pector Signature | |
| Certification i certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. rector Signature | |
| Certification i certify that the statements i have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. sector Signature | |
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| Certification i certify that the statements i have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. Pector Signature | |
| i certification i certification knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. Recipient Signature | |
| i certify that the statements i have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. Pector Signature | |
| perint orginantia | that any |
| Jun 12 hull 2: friday | |
| Least Downey H. M. EPEDEWRY.J. | |

EPA 7740-3 Rev (8-91)

Regional Office



| \$ EP | | | N, DC 20480 ES CONTROL ACT | OMB No. 2070-0007" Approval expires 10-31-92 |
|---|---|--|---------------------------------|---|
| 1. | INVESTIGATION IDEN | TIFICATION | 2, FIRM NAME | |
| ZUS IN | INSPECTOR NO. | DAILY SEO. NO. | penalt when the test | Angeles LLC |
| 3. INSPECTOR NAM JENDIFE 5. INSPECTOR ADD USEEA R 75 Hanst 250 Frant | E saturità approvi Incent provintation RESS allos sint to roso bolloator istret Concert forten horne officer (2000) cisco, CA 341 | s bi bolan ila al notam i princi ale autobinisti <u>9 princi ale al al princi</u> 19 princi al al al princi 19 princi di al al princi 19 princi di al princi 19 Wastangton 192 275 | 6. CHIER EXECUTIVE OFFICER NAME | frican altrud au't basit menogani am bis orientag maa OSeronn a namannohu is R M tob varienta tatta viotatugati ad viotatugati ad viotatugati |

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the date contain information entities to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agendy to assist you in asserting a CBI claim. If it is more conveniens for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following oriteria:

 Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

- 2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial progreding).
- 3. The information is not publicly available elsewhere.
- Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make sight that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by cartifled mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive canfidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice, Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be hendled under the agency's routine security system unless and until a claim is made.

| TO BE COMPLETED BY FACILITY OFFICIAL I have received and read the notice | RECEIVING THIS NOTIC | 25: If there is no one on the business confidentiality inspection materials will there is another compa- please designate below. | te premises of the facility who is authorized to make y claims for the firm, a copy of this Notice and other ill be sent to the company's chief executive officer. If my official who should also receive this information, |
|---|----------------------|--|--|
| SIGNATURE | | NAME | |
| NAME Unescurra | | TITLE | |
| TITLE SERVER MERCE | DATE SIGNED | ADDRESS | |
| EPA Form 7740-4 (12-82) | | | REGIONAL OFFICE |



| | | | 0 | |
|--|---|---|--|-----------------------------|
| | | US ENVIRONMENTAL PF WASHINGTON | OTECTION AGENCY DC 20460 | |
| EPA | | TOXIC SUBSTANCE | S CONTROL ACT | |
| | | RECEIPT FOR SAMPLE | S AND DOCUMENTS | |
| 1. INV | ESTIGATION IDENTIFICAT | TION | 2. COMPANY NAME | |
| DATE 9/25/11 | INSPECTION NO. FIS633 | DAILY SEQ. NO. | Clean Harbors Los Ange | Jes LLC |
| 3. INSPECTOR ADDRE 75 Haw there | iss USEPA Reg ne Street | jion 9 | 4. COMPANY ADDRESS 5756 Alba Street | · · · · · |
| San Franci | 1500) CA 9410 | 5 | Los Angeles, CA 900 | 28 |
| For internal EPA use. C mixtures described belo | opiés of this form may be p w collected in connection wi | rovided to receipient as a th the administration and | cknowledgement of the documents and samples of che enforcement of the Toxic Substances Control Act. | emical substances and/or |
| | RECEIPT OF DOCUM | ENT(S) AND/OR SAMP | LE(S) DESCRIBED IS HEREBY ACKNOWLEDGED: | |
| NO. | | | DESCRIPTION | |
| 1 | Clean t | tarbors ? | site Map | 1.0 |
| 11 | PCBW | pe san | ples - Warehouse + | FLab |
| 1 | Invent | reny List | for PCBS IN Days 1 | |
| 1 | 8/25/11 Profile profile | and anal LASCE | ytical for Onm 2 -0174 | 4612686; |
| 1 | Decon pro cutgoing | ceclures / f for a Feb | Inalytical before and After 2011 tank dontamin |)/ Wanitests ated w/ PCB |
| OPTIONAL: | | | NOT REQUESTED Requested | but not possible |
| DUPICATE OR SPLIT | SAMPLES: REQUESTED | | | |
| | | / | S SIL | _ |
| NAME | Downey | | DAVID COCHEAN | |
| TITLE Ehr. Sc | ientist | DATE SIGNED 8/25/11 | TITLE GENERAL MANAGER | DATE SIGNED 8-25-// |
| | | WIOUS VERSIONS AR | OBSOLETE *U.S. GPO: 1998-444-861/90159 | INSPECTOR'S COPY |

FPA FORM 7740-1 (REVISED JULY 1996) PF



| INVIRONMENTAL PROTECTIO | N AGENCY CHAIN OF C | USTODY RECORD | Richmond, CA 94804-4698 |
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| PROJ. NO. PROJECT | NAME Harbors TSCA RCB Inspection 8/25/11 | NO. | |
| SAMPLERS: (Signature) | | OF CON- TAINERS | REMARKS |
| DATE TIME MATRIX COMP. | B SAMPLE IDENTIFICATION | 1//// | |
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| S125/11 1:21 Win | VCH0825115W-2 | | Entrance |
| 2/25/11 1:24 Wipe | VcH0825115W-3 | | Range |
| 8/25/11 1:32 Mipe | V CH0825115W-4 | | Leaky transformer |
| 8/25/11 1:40 Wipe | V CH0825115W-5 | | Aay I |
| 8125/11 1:44 Mipe | V CH 08 25115W - 6 | | Bay 4 |
| 8/25/11 1:53 Nipe | V CH0825115W-7 | | Bay 5 |
| 8124/11 2:00 Wige | VCH0825115W-8 | > | Day 3 |
| 9/25/11 2:38 Wipe | VCH082511 5W - 9 | | Lab Hood # 1 |
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Attachment 4



Clean Harbors 5657 Alba Street Los Angeles, CA 90058 323.277.2500 800.282.0058 www.cleanharbors.com

October 4, 2011

VIA EMAIL (Delivery notification requested)

Mr. Christopher Rollins U.S. EPA, Region IX WST-3 75 Hawthorne Street San Francisco, CA 94105

RE: Clean Harbors Los Angeles, LLC – TSCA Inspection August 25, 2011

Dear Mr. Rollins:

This letter is to update you in regards to the facility inspection conducted at Clean Harbors Los Angeles, LLC on August 25, 2011. Based upon your observations and inspection findings, we conducted some additional due diligence on the matters you raised during the post-inspection briefing and would like to share our findings with you, for the record:

- During the facility inspection, it was observed that Drum# 24612696 had the speculative statement "Assume >500" written on the drum lid, by the generator. We have contacted the generator in order to determine the PCB source of contamination as it is our usual practice to learn as much about the waste characterization and source before we manage PCB waste at our TSCA- permitted facilities. While we are awaiting confirmation from the TSCA waste generator, Clean Harbors Los Angeles, LLC decided to sample and analyze the contents of the 55-gallon drum to determine the chemical concentration of PCB in this container, utilizing USEPA approved laboratory analytical methods. The sample was sent to Advanced Technology Laboratories, an independent, NELAP and California-certified laboratory, for PCB analysis. The results of the analysis indicate there were no detectable PCBs. A copy of the Advanced Technologies Laboratory report is enclosed for verification purposes.
- 2. During the facility inspection, the contents of a laboratory waste accumulation drum was questioned. Although we believe that the laboratory waste accumulation drum was in compliance with applicable RCRA and TSCA requirements, we have decided to re-train our TSCA facility laboratory teams on all Clean Harbors Laboratory Waste Standards of Operation (SOPs), to include waste container labeling requirements and waste classification under applicable State and Federal Rules and regulations.

"People and Technology Creating a Better Environment"





3. During the facility inspection, you collected 10 wipe samples from floor areas that were discolored or stained to determine if these areas were impacted by PCB spills. We also collected 2 additional split samples from each area you sampled, and sent one set of our split sampled to a California approved and certified laboratory for analysis in accord with the TSCA requirements. The results of analysis indicates all samples tested below the TSCA surface contamination standard (<10 μ g/100cm²) with the highest sample result being 2.2 μ g/100cm². A copy of our laboratory report is also enclosed.

During the meeting, you requested four items from us. The site map was provided in the meeting and the remaining items are included in the email. These items include, the inventory for Bays 1 thru 6 as of 8/25/11; profile and analytical for drum 24612696 (profile LASCE-0174); and the decontamination procedures, manifests and analytical for the February 2011 tank contamination.

In summary, we believe that we have faithfully responded to your concerns. We have also provided additional technical and analytical information, specific your inspection observations, which should assist you as you complete your inspection report.

Please do not hesitate to contact me if you have any further questions concerning this correspondence and especially the analytical data enclosed with this correspondence. I can be reached at (323) 277-2521 or via email at <u>cochrand@cleanharbors.com</u>.

Sincerely,

Dave Cochran Facility Manager



Clean Harbors TSCA Cleanup for Non-TSCA Tank

2/17/11 – tote with 40 gallons oil of 242 ppm oil was mistakenly pumped into tank V-10. Tank V-10 normally has oil <50 ppm.

2/22/11 – after reviewing lab analyticals, it was discovered that TSCA oil had been pumped into tank V-10. The tank, piping, pump and hoses used for pumping the tote were all closed off at this time as they were deemed TSCA contaminated. Even though analytical results showed that the oil in V-10 was 5.7 ppm, the 10,000 gallons in the tank were considered TSCA because of contact with the oil mentioned above. We began to use a pump with other hoses to continue pumping <50 oil into a separate tank. That processing could continue. No oil had been removed from tank V-10 between 2/17 and 2/22/11.

2/23/11 – arrangements were being made to properly dispose of the contaminated oil as well as decon the tank, piping, pump, and hoses. There was no spill of TSCA oil, so decon procedures were being applied to those things that had touch ed the oil.

2/24/11 – The 10,000 gallons were pumped into 2 isotainers to be shipped via rail to Clean Harbors PPM in Coffeyville, KS. 5,800 gallons were put into one isotainer and the other 4,200 gallons were put into. Once tank V-10 was emptied, it was time for the decontamination process of the tank, pump, hoses, and piping. As per federal regulations in CFR 761.79, 2000 gallons of a cleaning solvent with <50 ppm PCB was used to decon the tank and other equipment. Because the tank has a capacity of 20,000 gallons, 2000 gallons of mineral oil with <50 ppm PCB were used for decontamination. The cleaning solvent was flushed into the tank through the pump, piping and hoses that were used to pump the original 242 ppm PCB oil into tank V-10. The cleaning solvent was put in the tank from the top to ensure it cleaned the walls of the tank. This process was done three times with this solvent to insure the tank was cleaned. After each cleaning/flushing, a sample was taken of the solvent to check the PCB content. The results of the first cleaning was 4.2 ppm. The solvent after the second cleaning was 4.8 ppm. The third cleaning took place after the second result was confirmed. The third sample was taken and then analyzed in the evening by the lab.

2/25/11 – Upon arrival on the next day, the sample results for the last cleaning was ready with a reading of 5.3 ppm. We reviewed that all the piping, hoses and pump had been part of the tank cleanout for all three flushings and that it was ready to be returned to service. The tank, piping, pump and hoses were all deemed as non-porous. The isotainers containing the now TSCA oil were shipped to the railcar. At the Clean Harbors Coffeyville facility, the oil will be put through a dechloration process to remove all PCBs from the oil. After everything was reviewed to make sure the cleaning process had been done properly, the tank and equipment were returned to normal service.





TSCA Tank Rinse Log

| А. | Tank ID | V-10 | - |
|-----------|---|--------------------|------------|
| B. | Tank Capacity | 20000 | _gallons |
| C. | Date Rinsed | <u>2/24/2011</u> | |
| D. | Type of Rinsate Used | imineral oil <50 ا | ppm PCB |
| E. | Rinsate Volume (3 rinses x 0.1 x Tank Capacity) | 2025 | gallons |
| F. | Rinse System GPM | 45 | gal/minute |
| G. | Minimum Rinse Time Req'd (Rinse Vol Req'd/ Rinse System GPM) | 45 | minutes |
| Н. | Actual Rinse Time | | |
| | Start Time 7:15AM | | |
| | Stop Time <u>8:00AM</u> | | 1 4 |
| | Elapsed Time <u>45 min.</u> | | |
| I. | Rinse Performed By | JV | (initials) |
| J. | Rinsate Analytical Results | | |

| Sample ID: | V-10-1 | Sample ID: | | Sample ID: | |
|--------------|---------|--------------|-----|--------------|-----|
| Test Result: | 4.2 ppm | Test Result: | ppm | Test Result: | ppm |

K. Tank Interior Inspected Released By

______(initials)



| <u>V-10</u> 20000 2/24/2011 mineral oil <50 | gallons |
|--|--------------|
| <u>20000</u> <u>2/24/2011</u> mineral oil <50 | gallons |
| <u>2/24/2011</u> mineral oil <50 | ppm PCB |
| mineral oil <50 | ppm PCB |
| | |
| 2025 | gallons |
| 45 | gal/minute |
| 45 | minutes |
| ÷ | |
| | |
| | |
| | |
| JV | (initials) |
| | |
| | JV Sample |

| Sample ID: | V-10-2 | Sample ID: | | Sample ID: | |
|--------------|---------|--------------|-----|--------------|-----|
| Test Result: | 4.8 ppm | Test Result: | ppm | Test Result: | ppm |
| | | | | | |

| К. | Tank Interior Inspected | | |
|----|--------------------------------|----|------------|
| | Released By | JV | (initials) |



| ENVIRON | MENTAL SERVICES, INC. | TSCA ' | <u> Tank Rins</u> | e Log |
|---------|--|--|-------------------|------------|
| А. | Tank ID | | V-10 | |
| В. | Tank Capacity | | 20000 | gallons |
| C. | Date Rinsed | | <u>2/24/2011</u> | |
| D. | Type of Rinsate I | Jsed | mineral oil <50 |) ppm PCB |
| E. | Rinsate Volume (3 rinses x 0.1 x T | ank Capacity) | 2025 | gallons |
| F. | Rinse System GP | M | 45 | gal/minute |
| G. | Minimum Rinse (Rinse Vol Req'd | Time Req'd / Rinse System GPM) | 45 | minutes |
| н. | Actual Rinse Tin | ne | | |
| | Start Time | 1:20PM | | |
| | Stop Time | 2:05PM | • | |
| | Elapsed Time | 45 min | | |
| I. | Rinse Performed | ІВу | JV | (initials) |
| J. | Rinsate Analytic | al Results | | |

| Sample ID: | V-10-3 | Sample ID: | | Sample ID: | |
|--------------|---------|--------------|-----|--------------|-----|
| Test Result: | 5.3 ppm | Test Result: | ppm | Test Result: | ppm |



<u>CLEAN HARBORS LOS ANGELES, LLC TSCA</u> <u>DECONTAMINATION OF TANK V-10</u>

What Happened

A tote containing 40 gallons of oil that contained 242 ppm PCB was pumped by personnel into tank V-10 on 2/17/11. This tank normally contains oil <50 ppm PCB. This occurred due to employee error.

The problem was identified on 2/22/11 when the supervisor brought it to management's attention. At this time the facility ceased pumping into tank V-10 and closed it down by shutting down the valves. The pump, piping and hose used to pump the TSCA oil were shut down as well. From the time of the incident on 2/17/11 until the problem was discovered and the tank shut down on 2/22/11, only oil <50 ppm had been added to tank V-10. Nothing was removed from the tank during this same time period. At the time the tank was shut down, there was 8,100 gallons of oil inside. Due to the TSCA contact rule, all 8,100 gallons were considered TSCA regulated.

The EPA and California DTSC were notified on 2/22/11 of the incident.

Decontamination

The 8,100 gallons of contaminated oil were pumped through the same pump and piping and hose into portable railcar containers for proper offsite disposal.

It was determined that the tank decontamination must take place according to 40 CFR 761.79 (c)(1) as the tank is a PCB container. Tank V-10 needed to be rinsed three times with a predetermined solvent. Mineral oil < 50 ppm PCB was to be used.



The items that needed decontamination here were the tank, the pump, and the piping. The hose was deemed to be made of porous material. We delegated the hose to be PCB and put it with other PCB equipment.

Approximately 2,025 gallons were used to decontaminate the tank. This satisfies the requirement that the volume of the rinsate solvent must be at least 10% of the volume of the container. The solvent was pumped from another tank through the contaminated piping and the contaminated pump. The solvent was put into the tank V-10 to rinse the walls. After the rinsing, a sample of the rinsate solvent was obtained to determine the current PCB level of the solvent. The PCB content of the solvent after the first rinse was 4.2 PPM. The solvent was removed from the tank. The tank was rinsed likewise a second time. Again, a sample was taken for analysis. The PPM level showed to be 4.8 ppm PCB for this solvent. This was done again a third time with the solvent. The result was 5.3 ppm for the third rinsing.

The tank, the piping, and the pump were considered decontaminate at this time.

The rinsate solvent was added to the railcar containers to be disposed of. Additional oil <50 ppm PCB was added to the last railcar container to make sure it was full.

<u>Disposal</u>

The material was put in these portable containers for rail. They were shipped to a railcar from the Clean Harbors Los Angeles facility and loaded on the railcar. The railcar was then shipped to the Clean Harbors PPM facility in Coffeyville, KS for disposal.



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| | a De Cla 24 Cal Fact | esignated Facility Name and Sta Address rean Harbors PPM LLC 74 Highwaray 188 North fifewrille, KS 67337 Nyk Phone: (620) 281-6380 | | | US. EPAKO KSD: | Number 981 | 508 | 025 |
| | 9a. HM | 96. U.S. DOT Description (Inducting Proper Bhilipping Name, Hazard Class, 6D Number, and Pooking Group (if any)) | 10 Co | ntainera | 11. Total Quentity | 12. Uni | 1 | 13. Waste Codes |
| LATOR - | × | RO. UN2318. POLYCHLORINATED BIPHENYLS. LIQUID. (PCB) OIL <500PPMD, 9, PG III (PCB) | 001 | TT | | K | 261 | |
| GENE | | 2 01 22 100 12011 | - | - | 19113 | 1 | - | ++ |
| | - | | 1.12 | 1 | | _ | | |
| | | FS VA | | | | | þ | +-+ |
| | | OFFC | - | | | | | |
| · | 14. Bp | nosi Handing katructors and Additional Information | _ | 1 | | | | |
| 11 | 13. 4 E | spectrum of unit of the CRATE CERTIFICATION: I thereby decise that the comberts of the consignment rate material and labeled/placedod, and are in all respects in proper cancillon for transport according to applicable porter. Learthy that the contents of this consignment contern to the terms of the stacked EPA Acknowled cardly that the waste minimization estatement identified in 40 CFR 282.27(a) (if I are a large quantity general conforCifcont Priviled/Upod Nerme 1) f | Alfy and accurately of the International and m gmant of Consent. tor) or (b) (if I are a s | described above ational government mail quantity ge | e by the proper shi nersial regulations. nerator) is true. | pping nami H export si 2.2.0 | a, and are a ipment and | tassified, package at an the Primary |
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| X ANSPORIER INT'L + | General 16. Inte Transpo Transpo Transpo | amational Shipments | Port of L Dato las | | | | | anih Dey 2 251 onih Dey |
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|----------|-----------------|---|---|---|----|--|--|--|-------------------|-------------------|-------------|-------------|-------------|-------------|-----------------------|-----------------------|--------------------|-----------------|------------------|-----------------------|--------------|--------------|
| | Reporting Limit | | | | | | | | 1082511SW-11 | 1082511SW-10 | H082511SW-8 | H082511SW-7 | H082511SW-6 | H082511SW-5 | H082511SW-4 | H082511SW-3 | H082511SW-2 | 1082511SW-1 | MPLE NAME | NT : CLEAN HAR | : : 08/25/11 | |
| | ANALY | | | | | | | | LAB HOOD #2 FLOOR | LAB HOOD #1 FLOOR | BAY 3 | BAY 2 | BAY 4 | BAY 1 | LEAKY TRANSFORMER | WAREHOUSE RAMP | WAREHOUSE ENTRANCE | WAREHOUSE FLOOR | LOCATION | BORS ENVIRONMENTAL SE | | |
| Chemist | TED BY ATUN | | | | | | | | 0811- 14681 | 0811- 14680 | 0811- 14679 | 0811- 14678 | 0811- 14677 | 0811- 14676 | 0811- 14675 | 0811- 14674 | 0811- 14673 | 0811- 14672 | LAB ID NO. | RVICES | | EP |
| | . Valore is | | | | -1 | | | | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | Received Date | | | A METHOD 804 |
| | | | | | | | | | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | 8/25/2011 | Date Analyzed | | | 82A |
| | REVIEWE | | | | | | | | 082511WP | 082511WP | 082511WP | 082511WP | 082511WP | 082511WP | 08251 1WP | 082511WP | 082511WP | 082511WP | QC BATCH | | REFE | |
| , //at | | | | | | | | | | | | | | | | | | | Dilution | MATRIX : | RENCE | |
| poratory | | | | | | | | | - | - | | . | . | . _ | | | | | 꾠 | VIPE | ALBA P | |
| Manager | LITAR | 1 | | | | | | | ug/100cm* | ng/100cm* | ug/100cm | | ug/100cm- | ug/100cm* | ug/100cm ² | ug/100cm ² | ug/100cm² | ug/100cm² | Unit | | LANT | |
| | | | | | | | | | 1 | 1 | | 1 | 1 | 4 | 2.2 | 4 | 4 | 1 | Result | | | |



5656 Alba St., Los Angeles, CA. 90058 PH: (323) 277-2500 FAX: (323)-2772523

PCB ANALYTICAL REPORT



August 29, 2011

Edgar Militar Clean Harbors Environmental Services, Inc. 5756 Alba St. Los Angeles, CA 90058-1946

TEL: (323) 277-2501 FAX: (323) 277-2523

RE:

Attention: Edgar Militar

Sonel C H

ELAP No.: 1838 NELAP No.: 02107CA CSDLAC No.: 10196 ORELAP No.: CA300003

Workorder No.: 119573

Enclosed are the results for sample(s) received on August 26, 2011 by Advanced Technology Laboratories. The sample(s) are tested for the parameters as indicated in the enclosed chain of custody in accordance with the applicable laboratory certifications.

Thank you for the opportunity to service the needs of your company.

Please feel free to call me at (562)989-4045 if I can be of further assistance to your company.

Sincerely,

Eddie F. Rodriguez

Laboratory Director

The cover letter and the case narrative are an integral part of this analytical report and cannot be reproduced in part or in its entirety without written permission from the client and Advanced Technology Laboratories.



Advanced Technology Laboratories
 1 of 5

 3275 Walnut Avenue
 Signal Hill, CA 90755
 Tel: 562 989-4045
 Fax: 562 989-4040

| Advanced | Technology Laboratories | Date: 29-Aug-11 |
|------------|--|-----------------|
| CLIENT: | Clean Harbors Environmental Services, Inc. | |
| Project: | | CASE NARRATIVE |
| Lab Order: | 1 19573 | |

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Analytical Comments for EPA 8082

Sample 119573-001A, surrogate recovery biased low possibly due to matrix interferences.



Advanced Technology Laboratories

3275 Walnut Avenue, Signal Hill, CA 90755 Tel: 562. 989.4045 Fax: 562.989.4040

Page 1 of 4





Advanced Technology Laboratories

119573

ANALYTICAL RESULTS

Print Date: 29-Aug-11

Matrix: SOLID

CLIENT: Lab Order:

Client Sample ID: 24612696 Clean Harbors Environmental Services, Inc. Collection Date: 8/26/2011 10:45:00 AM

Project: 119573-001A Lab ID:

| Analyses | Re | sult | PQL | Qual | Units | Ι | DF | Date | Analyzed |
|----------------------------|-----------|-------|--------|------|--------|-----------|----|-----------|-----------------|
| PCBS BY GC/ECD | EPA 3550B | | | | EPA 80 | 82 | | | |
| Dunity CC4 110827A | QC Batch: | 75167 | | | | PrepDate: | | 8/27/2011 | Analyst: HL |
| Rumb. Goz Houzin | | ND | 50 | | ug/Kg | 1 | 1 | 8/2 | 7/2011 07:45 PM |
| Aroclor 1016 | | ND | 99 | | ug/Kg | 1 | 1 | 8/2 | 7/2011 07:45 PM |
| Aroclor 1221 | | ND | 50 | | υσ/Κα | | 1 | 8/2 | 7/2011 07:45 PM |
| Aroclor 1232 | | ND | 50 | | ug/Kg | | 1 | 8/2 | 7/2011 07:45 PM |
| Aroclor 1242 | | ND | 50 | | ua/Ka | | 1 | 8/2 | 7/2011 07:45 PM |
| Aroclar 1248 | | ND | 50 | | uo/Ka | | 1 | 8/2 | 7/2011 07:45 PM |
| Aroclor 1254 | | | 50 | | 49/19 | | 1 | 8/2 | 7/2011 07:45 PM |
| Aroclor 1260 | | ND | 50 | | pgrive | | 1 | 8/3 | 7/2011 07:45 PM |
| Aroclor 1262 | | ND | 50 | | pyrry | | 1 | 8/ | 7/2011 07:45 PM |
| Aroclor 1268 | | ND | 50 | | µg/Kg | | | 9/ | 7/2011 07:45 PM |
| Surr: Decachlorobiphenyl | | 13.6 | 39-122 | 5 | %REC | | 4 | 9/ | 7/2011 07:45 PM |
| Surr: Tetrachloro-m-xylene | | 67.6 | 45-111 | | %REC | | | 0/. | 11201101.40114 |

Qualifiers:

B Analyte detected in the associated Method Blank H Holding times for preparation or analysis exceeded

S Spike/Surrogate outside of limits due to matrix interference

E Value above quantitation range ND Not Detected at the Reporting Limit

Results are wet unless otherwise specified



Advanced Technology Laboratories

DO Surrogate Diluted Out

3275 Walnut Avenue, Signal Hill, C4 90755 Tel: 562. 989.4045 Fux: 562.989.4040





Date: 29-Aug-11

Advanced Technology Laboratories

Clean Harbors Environmental Services. Inc. CLIENT:

ANALYTICAL QC SUMMARY REPORT

| Project: Sampl ID: MB-75157 SampType: MBLK Te Sampt ID: PBS Batch ID: 75167 Te Client ID: PBS Batch ID: 75167 P Analyte Result P Arockor 1221 ND ND Arockor 1221 ND ND Arockor 1224 ND ND Arockor 1226 ND ND Arockor 1268 ND Sampte ID: LCS-75167 Sampt'Pype: LCS Sample ID: LCSS Batch ID: 75167 Arotkor P Analyte Analyte Result P | TestCode: 8082 S | | | | TestCode: | 8082_S | | |
|--|------------------|-------------------------|------|--------------|-----------------------|--------------------------|----------------|-------|
| Sample ID: MB-75167 SampType: MBLK Te Client ID: PBS Batch ID: 75157 Analyta Result Arodor 1016 ND Arodor 1212 ND Arodor 1221 ND Arodor 1222 ND Arodor 1232 ND Arodor 1248 ND Arodor 1248 ND Arodor 1248 ND Arodor 1254 ND Arodor 1268 ND Surr: Tetrachloror-m-xylene 17.917 Sample ID: LCS-76167 SampType: LCS Client ID: LCSS Batch ID: 76167 Aralyta Result | TestCode: 8082 S | | | | | | | |
| Client ID: PBS Batch ID: 75167 Analyte Result P Aractor 1016 ND Aractor 1221 ND Aractor 1221 ND Aractor 1232 ND Aractor 1243 ND Aractor 1248 ND Aractor 1248 ND Aractor 1248 ND Aractor 1248 ND Aractor 1248 ND Aractor 1264 ND Aractor 1268 ND Aractor 1288 ND Aractor 1268 ND Aractor 1288 ND Aractor 1268 ND Surr: Decarchtorobiphenyl 15,615 Te Surr: Terrachtor-m-xylene 17,917 Samptrype: LCS Te Sample ID: LCSS Batch ID: 75167 Te Analyta Result P | | Units: µg/Kg | | Prep Date: | 8/27/2011 | RunNo: 13613(| | |
| Analyte Result P Anoclor 1016 ND Anoclor 1221 ND Anoclor 1222 ND Anoclor 1242 ND Anoclor 1243 ND Anoclor 1244 ND Anoclor 1243 ND Anoclor 1244 ND Anoclor 1240 ND Anoclor 1240 ND Anoclor 1260 ND Anoclor 1260 ND Anoclor 1280 ND Surr: Decachlorobibenyl 16.665 Surr: Tetrachloro-m-xylene 17.917 Sample ID: LCS-75167 SampType: LCS Client ID: LCSS Batch ID: 75167 Analyla Result | TestNo: EPA 8082 | EPA 3550B | A | alysis Date: | 8/27/2011 | SeqNo: 22304; | 20 | |
| Arackar 1016 ND Arackar 1221 ND Arackar 1221 ND Arackar 1248 ND Arackar 1248 ND Arackar 1248 ND Arackar 1280 ND Arackar 1282 ND Arackar 1282 ND Arackar 1283 ND Surr: Decachlorobphenyl 16,665 Surr: Tetrachloror-m-xylene 17,917 Sample ID: LCS-76167 SampType: LCS Te Client ID: LCSS Batch ID: 75167 P | POL SPK value | SPK Ref Val | %REC | LowLimit H | IghLimit RPD Ref Va | %RPD R | PDLimit (| Jual |
| Aradar 1221 ND Aradar 1221 ND Aradar 1248 ND Aradar 1248 ND Aradar 1264 ND Aradar 1282 ND Aradar 1282 ND Aradar 1282 ND Aradar 1282 ND Aradar 1283 ND Aradar 1283 ND Aradar 1283 ND Aradar 10. LCS-75167 SampType: LCS Te Client ID: LCS Batch ID: 75167 Te Client ID: LCS Batch ID: 75167 P | 16 | | | | | | | |
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| Aroclor 1242 ND Aroclor 1246 ND Aroclor 1260 ND Aroclor 1280 ND Aroclor 1280 ND Surr: Decachlorobihenyl 16.665 Surr: Tetrachloro-m-xylene 17.917 Sample ID: LCS-75167 SampType: LCS Te Client ID: LCSS Batch ID: 75167 Te Arabyla Result P | 16 | | | | | | | |
| Aractor 1246 ND Aractor 1254 ND Aractor 1260 ND Aractor 1282 ND Aractor 1288 ND Surr: Decachlorohiphenyl 16.665 Surr: Tetrachloro-m-xylene 17.917 Surr: Tetrachloro-m-xylene 17.917 Sample ID: LCS-76167 SampType: LCS Te Client ID: LCSS Batch ID: 75167 Te Analyte Result P | 16 | | | | | | | |
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| Aroclor 1260 ND Aroclor 1282 ND Aroclor 1283 ND Surr: Decechlorobiphenyl 16.665 Surr: Tetrachloro-m-xylene 17.917 Sample ID: LCS-76167 SampType: LCS Te Client ID: LCSS Batch ID: 75167 Te Analyte Result P | 16 | | | | | | | |
| Aroctor 1262 ND Aroctor 1268 ND Sur: Decachlorobiphenyl 16.665 Sur: Tetrachloro-m-xylene 17.917 Sample ID: LCS-75167 SampType: LCS Te Client ID: LCSS Batch ID: 75167 Te Analyte Resutt P | 16 | | | | | | | |
| Aractor 1268 ND Surr: Decachlorobiphenyl 16,665 Surr: Tetrachloro-m-xylene 17,917 Sample ID: LCS-75167 SampType: LCS Te Client ID: LCSS Batch ID: 75167 Te Analyte Resutt P | 16 | | | | | | | |
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| Surr: Tetrachloro-m-xylene 17,917 Sample ID: LCS-76167 SampType: LCS Te Client ID: LCSS Batch ID: 75167 Analyta Result P | 16.67 | | 100 | 39 | 122 | | | |
| Sample ID: LCS-75167 SampType: LCS Te Client ID: LCSS Batch ID: 75167 Analyta Result P | 16.67 | | 107 | 45 | 111 | | | |
| Client ID: LCSS Batch ID: 75167 Analyte Result P | TestCode: 8082_S | Units: µg/Kg | | Prep Date: | 8/27/2011 | RunNo: 13613 | 0 | |
| Analyte Result P | TestNo: EPA 8082 | EPA 3550B | ¥ | atysis Date: | 8/27/2011 | SeqNo: 22304 | 21 | |
| | PQL SPK value | SPK Ref Val | %REC | LowLimit H | ighLimit RPD Ref Va | RPD R | PDLimit | Qual |
| Aroctor 1016 147.528 | 16 166.7 | • | 88.5 | 56 | 106 | | | |
| Aroclor 1260 150.131 | 16 166.7 | 0 | 90.1 | 57 | 119 | | | |
| Surr: Decachlorobiphenyl 14.728 | 16.67 | | 88.4 | 39 | 122 | | | |
| Surr. Tetrachloro-m-xylene 15.706 | 16.67 | | 84.2 | 45 | 111 | | 40. 1 | |
| Sample ID: 119581-001AMS SampType: MS Te | TestCode: 8082_S | Units: pg/Kg | | Prep Date: | 8/27/2011 | RunNo: 13613 | 0 | i |
| Client ID: ZZZZZ Batch ID: 75167 | TestNo: EPA 8082 | EPA 3660B | Ā | alysis Date: | 8/27/2011 | SeqNo: 22304 | 22 | |
| Analyte P | PQL SPK value | SPK Ref Val | %REC | LowLimit H | ighLimit RPD Ref Va | RPD R | PDLimit | Qual |
| Aroclor 1016 159.630 | 16 166.7 | 0 | 95.8 | 48 | 115 | | | |
| Aroclor 1280 172.620 | 16 166.7 | 0 | 104 | 48 | 133 | | | |
| Surr: Decachlarobiphenyl 15,906 | 16.67 | | 95.4 | 38 | 122 | | | |
| Qualifiers: | | | | | | | | |
| B Analyte detected in the associated Method Blank | E Value above | quantitation range | | | H Holding times for J | reparation or analysis | exceeded | |
| ND Not Detected at the Reporting Limit | R RPD outside | accepted recovery limit | 2 | | S Spike/Surrogate ou | tside of limits due to r | matrix interfe | rence |
| DO Surrogate Diluted Out | Calculations | are based on raw value | | | | | | |

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ND Not Detected at the Reporting Limit DO Surrogate Diluted Out Lubrand Composition

3275 Weldunt Avenue, Signal Hill, CA 90755 Tel: 562 989: 1045 Free: 562 989-4040 4 Of 5

| Anal Notl Surre | JENT: o prk Order: oject: iant ID: 119581- iant ID: ZZZZZZ Surr: Tetrachloro- surr: Tetrachloro- surr: Tetrachloro Surr: Tetrachloro Surr: Tetrachloro |
|---|---|
| yte detocted i Detected at th ggate Diluted <i>Fechnology</i> | 001AMS 001AMS 001AMSD 001AMSD 001AMSD |
| n the associated Method Blank le Reporting Limit Out | oors Environmental Servio SampType: MS Batch ID: 75167 Result 16.476 Batch ID: 75167 Result 159.514 15.9614 15.985 16.744 |
| Hui C-1 90 | TestCod TestCod For Festh PQL 16 |
| E Value ab R. RPD out Calculat | le: 8082_S SPK value SPK value 16.87 16.87 16.87 16.87 16.87 16.87 16.87 16.87 16.87 16.87 16.87 |
| suce quantitation range suce accepted recovery ions are based on raw v 52 989, <i>1045 Face</i> 56 | 2 EPA 3660B 2 EPA 3660B 2 EPA 3660B 2 EPA 3660B 3 SPK Ref Val 7 0 7 0 |
| 12 99, <i>4040</i> Of 5 | %REC 95.8 103 95.9 |
| | ANALY Prep Date LowLimit LowLimit LowLimit LowLimit 48 48 39 48 |
| S H | TTICA Te 8: 8/27/201 2: 8/27/201 2: 8/27/201 3: 8/27/201 4: 8/27/2 |
| ding times for ke/Surrogate c | RPD Ref Val 11 11 11 11 11 11 11 11 11 11 11 11 11 |
| preparation or an | UMMAR 8082_S RunNo: 13 SeqNo: 22 SeqNo: 22 SeqNo: 22 0,0100 0,000 0,0100000000 |
| alysis exceed | Y REP(8130 30422 RPDLImit RPDLImit 21 22 |
| ed Interference | Que |

| Citotainina | | lean Harbors Pro | file No. lasce-01 | 74 | | | |
|---|--|--|--|---|---|--|----------------------------------|
| GENERAL INFORMATIO | DN | CE | | them California Ed | ison | | - |
| GENERATOR EPA ID #/RE GENERATOR CODE (Assign DDRESS 1218 South | GISTRATION # ined by Clean Harbors) Fifth Ave Waste an: | CAD006908818 GE INV0267A CI1 d Water Division 2n | TY Monrovia STA | TE/PROVINCE C/ | 21P/POSTA | L CODE 91 | 016 |
| USTOMER CODE (Assign ADDRESS PO Box 800 | ed by Clean Harbora) | SOU1689 CU CIT | STOMER NAME: Sou IY Rosemead Sta | them California Ed TE/PROVINCE C | ison Company ZIP/POSTA | / LLCODE 91 | 770 |
| WASTE DESCRIPTION | Debris/Soil. Unkno | wn PCB lavel. Assumed >500 | | | | | |
| ROCESS GENERATING | NASTE: Spill | Cleanup | | | | | |
| THIS WASTE CONTAIN | D IN SMALL PACKAG | ING CONTAINED WITHIN A LARGE | ER SHIPPING CONTAINER ? | No | | | 4 |
| . PHYSICAL PROPERTIE | S (at 25C or 77F) | | | | | | |
| HYBICAL STATE SOLID WITHOUT FRE POWDER MONOLITHIC SOLID LIQUID WITH NO SOLI LIQUID/SOLID MIXTUR | | NUMBER OF PHASES/LAYER 1 2 3 % BY VOLUME (Approx.) | RS TOP 0.00 MIDDLE 0.00 BOTTOM 0.00 | VISCOSITY (if lid 1 - 100 (e.g. 1 101 - 500 (e.; 501 - 10,000 | juld present) Wator) g. Motor Oil) (e.g. Molasses) | COLOF <u>varie</u> : | <u>s</u> |
| % FREE LIQUID % SETTLED BOUD % TOTAL SUSPENDI | ED SOLID | | BOILING POINT *F (*C) | > 10,000 | "F (°C) | TOTAL ORGAN | IC |
| SLUDGE GAS/AEROSOL | | MILD STRONG Describe; | <= 95 (<=35) 95 - 100 (35-38 101 - 129 (38-5 | < 140 (140-200 4) ↓ 140-200 (>) | 50) (60-93) 73) | <= 1% | |
| | | 4 | >= 130 (>54) | | ., | >= 109 | 6 |
| < 73 (<23) 73 - 100 (23-38) 101 -140 (38-80) 141 -200 (60-93) > 200 (>93) | <= 2 2.1 - 6.9 7 (Neutral) 7.1 - 12.4 | < 0.8 (e.g. Gasoline) 0.8-1.0 (e.g. Ethanol) 1.0 (e.g. Water) 1.0-1.2 (e.g. Antifreozo) | < 0.1 0.1 - 1.0 1.1 - 5.0 5.1 - 20.0 | > 20 Unknown | < 2,000 (<4. 2,000-5,000 5,000-10,00 > 10,000 (>2 | 6) (4.6-11.6) 0 (11.6-23.2) 23.2) | |
| COMPOSITION (List | the complete composition | S > 1.2 (e.g. Methylene Chich of the waste, include any least and | | Ac | tual: | | |
| used | , please supply an MSD | S. Please do not use abbreviations.) |)) | tor individual componer | ts are acceptable | . If a trade name | is |
| | | | | MIN | I | MA | х иом |
| ADIE MACONDY | | | | 0.0 | | 100.000000 | 0 % |
| | | | | 0.0 | 000000 | 100.000000 | 0 % |
| ERAMIC | | •••••• | • | 0.0 | 000000 | 100.000000 | 0 % |
| TRUS BASED SOLVE | NTS | ••••• | | 0.0 | | 100.000000 | 0 % |
| EBRIS | | •••••••• | • | 0.01 | | 20.000000 | 0 % |
| ESEL | | ••••••• | | U.U | | 100.000000 | 0 % |
| RANIED EQUIPMENT | LAST CONT. PCB | | | 0.01 | | 5.000000 | 0 % |
| ASS | | •••••• | | U.UL | | 100.000000 | 0 % |
| | | •••••••••••••••••••• | | 0.00 | | 100.000000 | 0 % |
| | | | ••••••• | 0.00 | | 100.000000 | 0 % |
| ETAL FARTS, FIFES | AIN ANY HEAVY GALL | SE METAL DEBRIS OR OTHER LA METAL WIRE >12" LONG, METAL V | RGE OBJECTS (EX., METAL PL VALVES, PIPE FITTINGS, CONC | ATE OR PIPING >1/4" RETE REINFORCING | THICK OR >12" BAR OR | YES | V NO |
| OES THIS WASTE CONT DNG, METAL REINFORC IECES OF CONCRETE > | ED HOSE >12° LONG, 1 37)? | | | | | | |
| DES THIS WASTE CONT DNG, METAL REINFORC ECES OF CONCRETE >: If yes, describe, Inch | ED HOSE >12° LONG, 1 37? Iding dimensions: | | | | | | |
| OES THIS WASTE CONT DNG, METAL REINFORC IECES OF CONCRETE >: If yes, describe, inch OES THIS WASTE CONT | ED HOSE >12" LONG, 1 37? Iding dimensions: AIN ANY METALS IN P | OWDERED OR OTHER FINELY DI | VIDED FORM? | + | | YES | V NO |
| DES THIS WASTE CONT DNG, METAL REINFORC ECES OF CONCRETE >: Il yes, describe, inch DES THIS WASTE CONT DES THIS WASTE CONT UDS, MICROBIOLOGIC DTENTIALLY INFECTIOU | ED HOSE >12° LONG, I 37? AIN ANY METALS IN P AIN OR HAS IT CONTA AL WASTE, PATHOLOG S MATERIAL? | OWDERED OR OTHER FINELY DI ICTED ANY OF THE FOLLOWING; SICAL WASTE, HUMAN OR ANIMA | VIDED FORM? ANIMAL WASTES, HUMAN BLC AL DERIVED SERUMS OR PRO | DOD, BLOOD PRODUC | TS, BODY | YES | ND ND |
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| DES THIS WASTE CONT DRG, METAL REINFORC ECES OF CONCRETE >: If yas, describe, inch DES THIS WASTE CONT DES THIS WASTE CONT UIDS, MICROBIOLOGIC DTIENTIALLY INFECTOU I scknowledge that I based on my knowle Tho waste was never | ED HOSE >12* LONG, I 377 Juding dimensions: AIN ANY METALS IN P AIN OR HAS IT CONTA AL WASTE, PATHOLOG IS MATERIAL? his waste material is neit dge of the material. Set r exposed to potentially | OWDERED OR OTHER FINELY DI ICTED ANY OF THE FOLLOWING; SICAL WASTE, HUMAN OR ANIMA Iher Infoctious nor does it contain an lect info answar below that applies: Infectious material. | VIDED FORM? ANIMAL WASTES, HUMAN BLC AL DERIVED SERUMS OR PRO Ny organism known to be a threat | DOD, BLOOD PRODUC FEINS OR ANY OTHER to human health. This | TS, BODY certification is | YES YES YES | NO NO |
| DES THIS WASTE CONT SNG, METAL REINFORC ECES OF CONCRETE >: If yas, describe, inch DES THIS WASTE CONT UIDS, MICROBIOLOGIC DTENTIALLY INFECTOU I scknowledge that I based on my knowle Tho wasto was neve Chemical disinfection | ED HOSE >12" LONG, 1 3"? Juding dimensions: AIN ANY METALS IN P AIN OR HAS IT CONTA AL WASTE, PATHOLO (S MATERIAL? MATERIAL? Set of the material is neit dge of the material. Sol r exposed to potentially 1 or some other form of 1 | OWDERED OR OTHER FINELY DI CTED ANY OF THE FOLLOWING; SIGAL WASTE, HUMAN OR ANIMA Iher Infoctious nor does it contain an ect the answer below that applies: Infectious material. sterilization has been applied to the | VIDED FORM? ANIMAL WASTES, HUMAN BLC L DERIVED SERUMS OR PRO Ny organism known to be a threat wasto | DOD, BLOOD PRODUC FEINS OR ANY OTHER to human health. This is | TS, BODY | YES YES YES | NO NO NO |
| DES THIS WASTE CONT SNG, METAL REINFORC ECES OF CONCRETE >: If yas, describe, inch DES THIS WASTE CONT UIDS, MICROBIOLOGIC DIST THIS WASTE CONT UIDS, MICROBIOLOGIC DIST CONTROL INFECTION I scknowledge that t based on my knowle Tho wasto was neve Chemical disinfection CKNOWLEDGE THAT TI | ED HOSE >12" LONG, I 3"? Juding dimensions: AIN ANY METALS IN P AIN OR HAS IT CONTA AL WASTE, PATHOLO IS MATERIAL? MATERIAL? Set material is neit dge of the material. Set r exposed to potentially 1 or some other form of a 41S PROFILE MEETS T | OWDERED OR OTHER FINELY DI CTED ANY OF THE FOLLOWING; SIGAL WASTE, HUMAN OR ANIMA Iher Infectious nor does it contain an ect the answer below that applies: Infectious material. sterilization has been applied to the HE CLEAN HARBORS BATTERY F | VIDED FORM? ANIMAL WASTES, HUMAN BLC L DERIVED SERUMS OR PRO ny organism known to be a threat wasto. PACKAGING REQUIREMENTS, | DOD, BLOOD PRODUC TEINS OR ANY OTHER to human health. This i | TS, BODY | YES YES YES YES YES | NO NO NO NO |
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(leanHarbors

Clean Harbors Profile No. lasce-0174

E. CONSTITUENTS

Are these values based on testing or knowledge?

If based on knowledge, please describe in detail, the rationale applied to identify and characterize the waste material. Please include reference to Material Safety Data Sheets (MSDS) when applicable. Include the chemical or trade-hame represented by the MSDS, and or detailed process or oparating procedures which generate the waste.

..

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

| | DECULATED METALS | REGULATORY | TCLP | TOTAL | MOU | NOT APPLIC | ABLE | |
|----------|------------------------------|-------------------|---------------|-----------------------|--------------|----------------|-------------------|------------|
| RCRA | REGULATED METALO | LEVEL (mg/l) | mg/l | | | 1.0 | | |
| D004 | ARSENIC | 5.0 | | | | | | |
| 0006 | RADIIIM | 100.0 | | | | | | |
| | CADMILIM | 1.0 | | | | . L | | |
| 0006 | | 5.0 | | | | ۲. | | |
| D007 | CHRUMIUM | 50 | | | | Y | | |
| D008 | LEAD | | | | | 1 | | |
| D009 | MERCURY | | •••••• | | | ×. | | |
| D010 | SELENIUM | | | | | | | |
| D011 | SILVER | | | | | | | NOT |
| | VOLATILE COMPOUNDS | | | OTHER CONSTITUEN | กร | MAA | UUM | APPLICABLE |
| D018 | BENZENE | 0.5 | | | | | | a |
| D019 | CARBON TETRACHLORIDE | 0.5 | | BRUMINE | | | •••••• | |
| D021 | CHLOROBENZENE | 100.0 | | CHLORINE | | | | |
| 0022 | CHLOROFORM | 6.0 | | FLUORINE | | | | |
| 0028 | 1 2-DICHLOROFTHANE | 0.5 | | IODINE | | | | |
| | A A DICHLOROETHYLENE | 07 | | SULFUR | | | | 10 |
| D029 | I, I-DIGITEONOL INTEL | 200.0 | | POTASSIUM | | | | 6.1 |
| D035 | MEINTERING | 0.7 | | SODIUM | | | | - |
| D039 | TETRACHLURUEIHTLENE | | | AMMONIA | | | | |
| D040 | TRICHLOROETHYLENE | U,D | | CYANIDE AMENABLE | | | | Υ. |
| D043 | VINYL CHLORIDE | 0.2 | | CYANIDE REACTIVE | | | | 9 |
| | SEMI-VOLATILE COMPOUN | DS | | | | | | |
| D023 | o-CRESOL | 200.0 | | CTANDE IOTAL | | | • • • • • • • • • | |
| D024 | m-CRESOL | 200.0 | | SULFIDE REACTIVE | | | | 1.2.d |
| D025 | p-CRESOL | 200.0 | | HOCs | | PCBs | | |
| 0026 | CRESOL (TOTAL) | 200.0 | | | | NON | | |
| D027 | 14-DICHLOROBENZENE | 7.5 | | W NONE | | < 50 | PPM | |
| 0030 | 24-DINITROTOLUENE | 0.13 | | < 1000 PPM | | 11 | D DDM | |
| 0030 | NEYACHI OPOBENZENE | 0.13 | | >= 1000 PPM | | | | |
| 0032 | | 0.5 | | | | WASTE R | FGULATED | BY TSCA 40 |
| D033 | HEACHLOROBUTADIENE | | | | | CFR 7617 | | |
| D034 | HEXACHLORDETHANE | | | | | THE M | 5 | NO |
| D036 | NITROBENZENE | | | • | | 1 1 1 | | |
| D037 | PENTACHLOROPHENOL | 100.0 | | | | | | |
| D038 | PYRIDINE | 5.0 | | | | | | |
| D041 | 2,4,5-TRICHLOROPHENOL | 400.0 | | | | | | |
| D042 | 2,4,6-TRICHLOROPHENOL | 2.0 | | | | | | |
| | PESTICIDES AND HERBICI | DES | | | | | | |
| D012 | ENDRIN | 0.02 | | | | | | |
| D013 | UNDANE | 0.4 | | | | | | |
| D014 | METHOXYCHLOR | 10,0 | | | | | | |
| D015 | TOXAPHENE | 0.5 | | · | | | | 1 |
| 0013 | 24.0 | 10.0 | | | | | | |
| 0010 | | 10 | | | | | | |
| D017 | 2,4,0-1 P (DILVEA) | | | • | | | | |
| D020 | CHLORDANE | 0.03 | | • | | | | |
| D031 | HEPTACHLOR (AND ITS EPOXI | DE) 0.008 | | • | | | | |
| ADDITION | AL HAZARDS | | | SOCIATED WITH IT WHIC | CH COULD AFF | ECT THE WAY IT | SHOULD BI | HANDLED? |
| DOESTH | S WAS IE HAVE ANY UNDISCLOSE | U RAZARUS OR PRIO | N NODENI O NO | | | | | |

YES 📝 NO (If yes, explain)

| POLYMERIZABLE | RADIOACTIVE | REACTIVE MATERIAL | NONE OF THE ABOVE |
|-------------------------|-------------|-------------------|----------------------------|
| DEA REGULATED SUBSTANCE | EXPLOSIVE | FUMING | OSHA REGULATED CARCINOGENS |
| CHOOSE ALL THAT APPLY | | | |

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Clean Harbors Profile No. lasce-0174

| VES | W NO. | | | E Contraction of the second seco |
|--|---|--|--|--|
| 120 | 31 10 | USEPA HAZARDOUS WASTE? | | |
| YES | NO | DO ANY STATE WASTE CODES | APPLY? | |
| | | 261 | | |
| | | Texas Waste Code outs0021 | | |
| YES | V NO | DO ANY CANADIAN PROVINCIA | L WASTE CODES APPLY? | |
| | | L | | |
| YES | NO | I DR CATEGORY | blast to LOR | MENT PER TO OFR PART 2007 |
| | | VARIANCE INFO: | Djeci lo LDR | |
| YES | V NO | IS THIS A UNIVERSAL WASTE? | | |
| YES | V. NO | IS THE GENERATOR OF THE W | ASTE CLASSIFIED AS CONDITIONALLY EXEMPT S | SMALL QUANTITY GENERATOR (CESQG)? |
| YES | NO | IS THIS MATERIAL GOING TO B | E MANAGED AS A RCRA EXEMPT COMMERCIAL F | PRODUCT, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))? |
| YES | NO NO | DOES TREATMENT OF THIS WA | STE GENERATE A F006 OR F019 SLUDGE? | |
| YES | NO | IS THIS WASTE STREAM SUBJE | CT TO THE INORGANIC METAL BEARING WASTE | PROHIBITION FOUND AT 40 CFR 268.3(C)? |
| YES | V NO | DOES THIS WASTE CONTAIN V | DC'S IN CONCENTRATIONS >=500 PPM? | |
| YES | NO | DOES THE WASTE CONTAIN GR | REATER THAN 20% OF ORGANIC CONSTITUENTS | WITH A VAPOR PRESSURE >= _3KPA (.044 PSIA)? |
| YES | V NO | DOES THIS WASTE CONTAIN A | NORGANIC CONSTITUENT WHICH IN ITS PURF F | ORM HAS A VAPOR PRESSURE > 77 KPA (11.2 PSIA)? |
| YES | V NO | | | |
| YES | V NO | IS THE WASTE SUR LECT TO ON | | |
| 120 | NO | Haterious Ossanla MECHAI | | cals production (subpart GGG) |
| VES | | | | |
| YES | ND | IF THIS IS A US EPA HAZARDOL | JS WASTE, DOES THIS WASTE STREAM CONTAIN | I BENZENE? |
| OT/TD | INFORMA | | | |
| TDG P UN3 TRANS IMATE 1-15 | ROPER SHI 432, POLI PORTATION D SHIPMEN CONTAINE CAPACITY: | TION PPING NAME: YCHLORINATED BIPHENYLS, I REQUIREMENTS T FREQUENCY ONE TIME WE DNTAINERIZED IRS/SHIPMENT | BOLID, 9, PG III EKLY MONTHLY 😧 QUARTERLY YEARLY BULK LIQUID GALLONS/SHIPMENT: 0 Min -0 Max | OTHER <u>Other</u> BULK SOLID GAL SHIPMENT UOM: TON YARD |
| TTDG P UN3 TRANS TIMATE 1-15 DRAGE NTAINE | ROPER SHI 4432, POLI PORTATION D SHIPMEN GUIDANNE CONTAINE CAPACITY: R TYPE: | TION PPING NAME: YCHLORINATED BIPHENYLS, I REQUIREMENTS T FREQUENCY ONE TIME WE DNTAINERIZED IRS/SHIPMENT | BOLID, 9, PG III EKLY MONTHLY () QUARTERLY YEARLY BULK LIQUID GALLONS/SHIPMENT: 0 Min -0 Max | Y OTHER <u>Other</u> BULK SOLID GAL SHIPMENT UOM: TON YARD TONS/YARDS/SHIPMENT: 0 Min - 0 Max |
| TRANS | ROPER SHI 3432, POLI PORTATION D SHIPMEN WI CI CONTAINE CAPACITY: R TYPE: JBIC YARD | TION PPING NAME: CHLORINATED BIPHENYLS, REQUIREMENTS T FREQUENCY ONE TIME WE DATAINERIZED RS/SHIPMENT BOX PALLET | BOLID, 9, PG III EKLY MONTHLY 😧 QUARTERLY YEARLY BULK LIQUID GALLONS/SHIPMENT: 0 Min -0 Max | OTHER <u>Other</u> BULK SOLID GAL SHIPMENT UOM: TON YARD TONS/YARDS/SHIPMENT: 0 Min - 0 Max |
| TTDG P UN3 TRANS IMATE 1-15 DRAGE NTAINE CL | ROPER SHI 2432, POL1 PORTATION D SHIPMEN CONTAINE CONTAINE CAPACITY: R TYPE: JBIC YARD DTE TANK (HER: | TION PPING NAME: 'CHLORINATED BIPHENYLS, REQUIRCMENTS T FREQUENCY ONE TIME WE DATAINERIZED RS/SHIPMENT BOX PALLET DRUM | BOLID, 9, PG III EKLY MONTHLY 😧 QUARTERLY YEARLY BULK LIQUID GALLONS/SHIPMENT: 0 Min -0 Max | OTHER <u>Other</u> BULK SOLID GAL SHIPMENT UOM: TON YARD TONS/YARDS/SHIPMENT: 0 Min - 0 Max |
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| TDG P, UN3 FRANS IMATE 1-15 PRAGE IT AINE CI TO TO TO TO TO TO TO TO TO TO TO TO TO | ROPER SHI M32, POL1 PORTATION D SHIPMEN CONTAINE CAPACITY: RTYPE: JBIC YARD JEC YARD JEC YARD JEC YARD THER: REQUEST S OR REQUE: S CERTIFICAT S OR REQUE: S CERTIFICAT S OR REQUE: S CERTIFICAT S OR REQUE: S CERTIFICAT S | TION PPING NAME: CCHLORINATED BIPHENYLS, REQUIREMENTS T FREQUENCY ONE TIME WE DATAINERZED RS/SHIPMENT BOX PALLET DRUM DRUM SIZE: TTS: TOM do eascult his document as an authorize stratement restarting the actual we present the actual we presen | BOLID, 9, PG III EKLY MONTHLY OQUARTERLY YEARLY BULK LIQUID GALLONS/SHIPMENT: 0 Min -0 Max d sgent. I hereby cartly bat al information submitted in this ar ste. I Clean Martors discovers a discrepancy during the appr recy. AME (PRINT) T Vis signature system. Uniform Sound in 40 CFR Part 284, 12(b) and at equivalent Su he hazardous waste described on this waste profile have the a sase been a change in the waste generating process or when the | A OTHER <u>Other</u> BULK SOLID GAL SHIPMENT UOM: TON YARD TONS/YARDS/SHIPMENT: 0 Min - 0 Max |



Clean Harbors Profile No. lasce-0174

Addendum

| D. COMPOSITION | | MI | • • | MAX | UOM |
|----------------|---|-----------|---------|-----------------|-----|
| CHEMICAL | | 0.0 | - 0000 | 100.000 0000 | % |
| PCRS | ••••••••••••••••••••••••••••••••••••••• | 0.0 00 | 5000 | 100.000 0000 | % |
| PIPE | ••••••••••••••••••••••••••••••••••••••• | 0.0 00 | - 00000 | 100.000 | % |
| PLASTIC | ••••••• | 0.0 00 | - 00000 | 100.000 0000 | % |
| SOL | •••••• | 0.0 | - 00000 | 100.000 0000 | % |
| WOOD | ••••••• | 0.0 | - 00000 | 100.000 0000 | % |
| | | | | | |

Report Printed On : Thursday, August 25, 2011

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/WINWEB/Profile\Waste Profile_rdl

Page 4 of 4



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| Advanced Technology | Laboratories |
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Date: 29-Aug-11

CLIENT: Clean Harbors Environmental Services, Inc. Project: Lab Order: 119573

CASE NARRATIVE

Analytical Comments for EPA 8082

Sample 119573-001A, surrogate recovery biased low possibly due to matrix interferences.



3275 Walnut Avenue, Signal Hill, CA 90755 Tel: 562, 989,4045

Page 1 of 4 Fax: 562.989.4040



8/27/2011 07:45 PM

ANALYTICAL RESULTS Print Date: 29-Aug-11

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| Advanced | Technology | Laborato | ries | - | | | Print Date: | 29-Aug-11 | |
|--|--|---------------|-----------|----------|--------------------|-----------------------------------|---|-------------------|--------------------------------------|
| CLIENT: Lab Order: Project: Lab ID: | Clean Harbors 119573 119573-001A | Environmental | Services, | Inc. C | Client S Collec | Sample ID ction Date Matrix | e: 24612696 e: 8/26/2011 c: SOLID | 10:45:00 / | AM |
| Analyses | | Re | sult | PQL | Qual | Units | DF | Date | Analyzed |
| PCBS BY GC | ECD | EPA 3550B | | | 1 | EPA 8082 | | | |
| | 110827A | QC Batch: | 75167 | | | Pr | epDate: | 8/27/2011 | Analyst: HL |
| Aroclor 1016 | | | ND ND | 50 99 | | µg/Кg µg/Кg | 1 | 8/2 8/2 8/2 | 27/2011 07:45 PM 27/2011 07:45 PM |
| Arocior 1232 Arocior 1242 | | | ND ND | 50 50 | | µg/Kg µg/Kg | 1 | 8/ | 27/2011 07:45 PM 27/2011 07:45 PM |
| Aroclor 1248 | | | ND | 50 | | μg/Kg | 1 | 8/ | 27/2011 07:45 PM |

ND

ND

ND

ND

13.6

67.6

50

50

50

50

8

39-122

45-111

µg/Kg

µg/Kg

µg/Kg

%REC

%REC

| | |
|------|--|

Arocior 1254

Aroclor 1260

Aroclor 1262

Aroclor 1268

Surr: Decachlorobiphenyl

Surr: Tetrachloro-m-xylene

B Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

S Spike/Surrogate outside of limits due to matrix interference DO Surrogate Diluted Out

E Value above quantitation range

ND Not Detected at the Reporting Limit Results are wet unless otherwise specified

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Laboratories

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3 of 5

Date: 29-Aug-11

Advanced Technology Laboratories

CLIENT: Clean Harbors Environmental Services, Inc. Work Order: 119573

ANALYTICAL QC SUMMARY REPORT TestCode: 8082 S

| Sample ID: MB-76167 Client ID: PBS Analyte Arodor 1016 Arodor 1221 | | - | | | | | | | | |
|--|-----------------|----------------|-------------|---------------|------|-----------------------|--------------|-------------------|----------------|---------|
| Client ID: PBS Analyte Arador 1016 Aracior 1221 | SampType: MBLK | TestCode | 5 8082_S | Units: µg/Kg | | Prep Date: | 8/27/2011 | | RUNNO: 136130 | |
| Analyle Arador 1016 Arodor 1221 | Batch ID: 75167 | TestNo | CEPA 8082 | EPA 3650B | × | natysis Date: | 8/27/2011 | | SeqNo: 2230420 | |
| Arador 1016 Arador 1221 | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit ¹ | HighLimit RP | D Ref Val | %RPD RPDLimit | B |
| Aroctor 1221 | QN | 16 | | | | | * | | | |
| | Q | 1 6 | | | | | | | | |
| Aroclor 1232 | Ð | 16 | | | | | | | | |
| Aroctor 1242 | 9 | 92 | • | | | | | | | |
| Arodar 1248 | Q | 16 | | | | | | | | |
| Aroctor 1254 | Ð | 16 | | | | | | | | |
| Arocler 1280 | Ð | 16 | | | | | | | | |
| Aroclor 1262 | Ð | 16 | | | | | | | | |
| Araclar 1268 | Q | 16 | | | | | | | | |
| Sur: Decembrobiahenvi | 16.665 | | 16.67 | | ê | 8 | 122 | | | |
| Surr: Tetrachloro-m-xylene | 17.817 | | 16.67 | | 107 | 45 | 111 | | | |
| | Camera 1 Ce | TaetCod | P 2087 9 | Linits: un/Ka | | Prep Date | :: 8/27/2011 | | RunNo: 136130 | |
| Sample ID: FCS-/016/ | Sampi ype. Los | | | | | Anahele Date | thrutter . | | SeaNo: 2230421 | |
| Client ID: LCSS | Batch ID: 76167 | lestn | 0: EPA 8082 | ELA 30305 | | | | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit Ri | PD Ref Val | %RPD RPDLIM | t Oual |
| Amelin 1018 | 147.528 | 18 | 166.7 | • | 88.5 | 58 | 106 | | | |
| Amder 1280 | 150.131 | 16 | 168.7 | 0 | 90.1 | 57 | 119 | | | |
| Sur Decembroblohenvi | 14.728 | | 16.67 | | 88.4 | 39 | 12 | | | |
| Surr: Tetrachloro-m-xylene | 15.706 | | 16.87 | | 94.2 | 45 | ŧ | | | |
| Sample ID: 119581-001AMS | SampType: MS | TestCod | e: 8082_S | Units: µg/Kg | | Prep Dati | b: 8/27/2011 | | RunNo: 136130 | |
| Client ID: ZZZZZ | Batch ID: 75167 | TestN | o: EPA 8082 | EPA 3650B | | Analysis Dati | e: 8/27/2011 | | SeqNo: 2230422 | |
| Analyte | Result | POL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit R. | PD Ref Val | %RPD RPDLim | iit Qua |
| Amder 1016 | 159.630 | 9 | 166.7 | 0 | 95.8 | 4 | 115 | | | |
| Amolor 1260 | 172.620 | 16 | 166.7 | 0 | 104 | 48 | 133 | | | |
| Surver Decarblombinhenvi | 15,906 | | 16.67 | | 95.4 | 39 | 12 | | | |

H Holding times for preparation or analysis exceeded
 S Spike/Surrogate outside of limits due to matrix interference

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E Value above quantitation range R RPD outside accepted recovery limits Calculations are based on raw values

Analyte detected in the associated Method Blank
 ND Not Detected at the Reporting Limit
 DO Surrogate Diluted Out

Qualifiers:

4 of 5

Clean Harbors Environmental Services, Inc. 119573 Work Order: Project: CLIENT:

ANALYTICAL QC SUMMARY REPORT

TestCode: 8082_S

| Sample ID: 119681-001AMS Client ID: 277772 | SampType: MS Batch ID: 75167 | TestCo | de: 8082_S Vo: FPA 8082 | Units: µg/Kg FPA 3650R | | Prep Date Analveie Date | 8/27/201 | 5 1 | RunNo: 136 Secho: 723 | 130 | |
|---|---------------------------------|--------|----------------------------|---------------------------|------|----------------------------|------------|-------------|--------------------------|----------|------|
| Analyte | Result | Pol | SPK value | SPK Ref Val | %REC | LowLimit | HghLimit | RPD Ref Val | %RPD | RPDLimit | Qual |
| Surr: Tetrachloro-m-xylane | 16.476 | | 16.67 | | 98.8 | 45 | 111 | | | | |
| Sample ID: 119681-001AMSD | SampType: MSD | TestCo | de: 8082_S | Units: µg/Kg | | Prep Date | : 8/27/201 | 1 | RunNo: 136 | 130 | |
| Client ID: ZZZZZ | Batch ID: 76167 | Test | Vo: EPA 8082 | EPA 3650B | | Analysis Date | 8/27/201 | · - | SeqNo: 223 | 0423 | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | RPD Ref Val | %RPD | RPDLimit | Qual |
| Aroctor 1018 | 159.614 | 16 | 166.7 | 0 | 95.8 | 84 | 115 | 159.6 | 0.0100 | 20 | |
| Aroctor 1260 | 172.209 | 8 | 166.7 | • | 103 | 84 | 133 | 172.6 | 0.238 | 20 | |
| Surr. Decachlorobiphenyl | 15.995 | | 18.67 | | 95.9 | R | 122 | | 0 | 20 | |
| Surr: Tetrachloro-m-xylene | 16.744 | | 18.67 | | 100 | 45 | 111 | | - | c | |

 Analyte detected in the associated Method Blank
 Not Detected at the Reporting Limit
 DO Surrogate Diluted Out Qualifiers:

E Value above quantitation range R RPD outside accepted recovery limits Calculations are based on raw values

H Holding times for preparation or analysis exceeded S Spike/Surrogate outside of limits due to matrix interference

Advanced Technology Laboratories

3275 Walnut Avenue, Signal Hill, CA 90755 Tel: 562 989,4045 Fax: 562,989,4040

5 of 5

| Inb Prof Lab Comments & Instructions | Laddars-VB kunctoning science science and science and science and science and science and science and science a | | ### CH403578 SWITCH <gooppw; 24533128<="" drum="" see="" th=""><th>Leveraga in knymer polic schoppen policy frankformers.</th><th>HH L/S.C.AUTO BUSINED SITE OF A CONTRACT AND A CONTRACT</th><th>11 jase-0174 ob debris, metal rein metal wirv pipe fittini concrete reinforcting bar or pieces of concrete >3"):CONTAINS TSCA PCBs - DO NOT SHIP OUT OF THE COUNTRY. OSHA CARCINOGEN.</th><th>011 LASC=007 PCB DEBRIS; PCBS, DO NOT SHIP OUT OF COUNTRY</th><th>### lace-0174 pcb debrit; See drum 24612696</th><th>## JACE-003 PDL E BOPM, See Amm. 2472E69</th><th>ess destructions por LEG dont revealed and and a single out of U.S. Non-TSCA PCBs. Do not able out of country</th><th></th><th>### dwptran-0POLE 10PPM; See drum 24394009</th><th>### dwptran-0 POLE 12PPW; see drum 24394009</th><th>### duptrand-DOLE PDMS See drum 23334009</th><th></th><th>am under auch verbrung verbrung and standing and standing and standing and standing and standing and standing a</th><th>### dwptran-0 POLE 15PPM; See drum 24394009</th><th>### duptran-0 POLE 8PPM; See drum 24394008</th><th>### Subtrain-PDEL 3 PDPM, See drum 2334000 ## Nubtrains.PDEL 3 PDPM, See drum 2434000</th><th></th><th>### LAGE-003 POLE 62PPM; See drum 23762649</th><th></th><th>## JUSTS-E011 HARDSTORMER SOCA997PM K-E35 (14 PPM) See drim 24/6.245</th><th></th><th>Hitt duritan-D POLE 61PMS See drum 24394009</th><th>### duptran-0-POLE 19PPNt; see drum 24394005</th><th>### Upprano PDLE 6PMK See drum 24394005</th><th>01 LASE GOS PUE PAPAN, COMBINSTO PCB, DON CAP OF CAS, DO NOT SHIP OUT OF COUNTRYEVALUATE FO R PROCESS ON RECEIPT., OUTBOUND TO COFFERVILLE ONLYTHE CONTRACT WITH THIS CUST WH 1 AFTE CONTRAMENTATION FOR ADDRESS FOR ONLY EAST ADDRESS FOR OUT OF COUNTRYEVALUATE FO R PROCESS ON RECEIPT., OUTBOUND TO COFFERVILLE ONLYTHE CONTRACT WITH THIS CUST WH 1 AFTE CONTRAMENTATION FOR ADDRESS FOR ONLY EAST ADDRESS FOR OUT OF COUNTRYEVALUATE FO R PROCESS ON RECEIPT., OUTBOUND TO COFFERVILLE ONLYTHE CONTRACT WITH THIS CUST</th><th>## JSGEE-019 ININIER APPRILS - DOWNER - SOUTH - SOUTH</th><th>### LASCE-017 BUSHING 17PPM\$; see drum 24721440</th><th>### Acception SapeWise and marked and mark</th><th>## 1445-1421 PLSTIPUS STPMY. See DIUM 2412440</th><th></th><th>### DWPTRAN pole 55PPM; See drum 24588740</th><th></th><th>ни актоглатерие и рати, зее отип 243-2405 11 Актоглатерие и рати, зее отип 243-24055</th><th></th><th>### LASCE-016 BUSHING BOPPM\$ See drum 24896834</th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th></gooppw;> | Leveraga in knymer polic schoppen policy frankformers. | HH L/S.C.AUTO BUSINED SITE OF A CONTRACT AND A CONTRACT | 11 jase-0174 ob debris, metal rein metal wirv pipe fittini concrete reinforcting bar or pieces of concrete >3"):CONTAINS TSCA PCBs - DO NOT SHIP OUT OF THE COUNTRY. OSHA CARCINOGEN. | 011 LASC=007 PCB DEBRIS; PCBS, DO NOT SHIP OUT OF COUNTRY | ### lace-0174 pcb debrit; See drum 24612696 | ## JACE-003 PDL E BOPM, See Amm. 2472E69 | ess destructions por LEG dont revealed and and a single out of U.S. Non-TSCA PCBs. Do not able out of country | | ### dwptran-0POLE 10PPM; See drum 24394009 | ### dwptran-0 POLE 12PPW; see drum 24394009 | ### duptrand-DOLE PDMS See drum 23334009 | | am under auch verbrung verbrung and standing and standing and standing and standing and standing and standing a | ### dwptran-0 POLE 15PPM; See drum 24394009 | ### duptran-0 POLE 8PPM; See drum 24394008 | ### Subtrain-PDEL 3 PDPM, See drum 2334000 ## Nubtrains.PDEL 3 PDPM, See drum 2434000 | | ### LAGE-003 POLE 62PPM; See drum 23762649 | | ## JUSTS-E011 HARDSTORMER SOCA997PM K-E35 (14 PPM) See drim 24/6.245 | | Hitt duritan-D POLE 61PMS See drum 24394009 | ### duptran-0-POLE 19PPNt; see drum 24394005 | ### Upprano PDLE 6PMK See drum 24394005 | 01 LASE GOS PUE PAPAN, COMBINSTO PCB, DON CAP OF CAS, DO NOT SHIP OUT OF COUNTRYEVALUATE FO R PROCESS ON RECEIPT., OUTBOUND TO COFFERVILLE ONLYTHE CONTRACT WITH THIS CUST WH 1 AFTE CONTRAMENTATION FOR ADDRESS FOR ONLY EAST ADDRESS FOR OUT OF COUNTRYEVALUATE FO R PROCESS ON RECEIPT., OUTBOUND TO COFFERVILLE ONLYTHE CONTRACT WITH THIS CUST WH 1 AFTE CONTRAMENTATION FOR ADDRESS FOR ONLY EAST ADDRESS FOR OUT OF COUNTRYEVALUATE FO R PROCESS ON RECEIPT., OUTBOUND TO COFFERVILLE ONLYTHE CONTRACT WITH THIS CUST | ## JSGEE-019 ININIER APPRILS - DOWNER - SOUTH | ### LASCE-017 BUSHING 17PPM\$; see drum 24721440 | ### Acception SapeWise and marked and mark | ## 1445-1421 PLSTIPUS STPMY. See DIUM 2412440 | | ### DWPTRAN pole 55PPM; See drum 24588740 | | ни актоглатерие и рати, зее отип 243-2405 11 Актоглатерие и рати, зее отип 243-24055 | | ### LASCE-016 BUSHING BOPPM\$ See drum 24896834 | | | | | | | | |
|--------------------------------------|---|---------------|---|--|--|---|---|---|--|---|---------------|--|---|--|---------------|---|---|--|--|---------------|--|---------------|--|---------------|---|--|---|--|---|--|--|---|---------------|---|---------------|---|---------------|---|--|--|--|--|--|--|--|---|
| aso | | | | | | s 1102/2/L | 1 1102/E/L | 1 **** | | | 0 | P MHANNANA | annunuu d | p ######### | P #NUMUUUU | P ######### | p ######### | P ######## | P ######### | | 7 ####### F | | | p ######### | hunnun d | P ######## | P ######## | J 1102/9/8 | | U ######## | 1 #################################### | | P ######### | D ######## | P ########## | | | 1 ######## | | | | | | | | • |
| racking Q Type | 100 CW | 40 CM | 100 CM | 228 CM | 55 DM | 16 DM | 16 DM | 16 DM | 1645 CM | B03 CM | 308 EA | 786 CM | 546 CM | 1200 CM | 405 CM | 601 CM | 337 CM | 637 CM | 689 CM | 2736 CM | 523 CM | 280 CM | 740 CM | 703 CM | 794 CM | 675 CM | 682 CM | | 150 CM | 150 CM | 150 CM | EZO CIM | 440 CM | 220 CM | 1206 CM | 31 CM | 31 CM | 31 CM | | | | | | | | |
| Weight 1 | | 4 | 8 | 228 | 15 | R | 22 | 8 | 1645 | 808 | 308 | 786 | 546 | 9 <u>7</u> 1 | 6/9 402 | 109 109 | 337 | 637 | 2787 | 2736 | 523 | 82 | 04/ | E01 | 794 | 675 | 682 | | 15 | 150 | 51 | A 6 | 440 | 220 | 1206 | 81/1 | 1 12 | 31 | | | | | | | | |
| Net Age Area | 1-MQ. 58 56 | I-MO, SE SE | 1-MQ, SE 55 | I-MO. SE SE | E-MG, 251 25 | E-MQ, 6E 6E | E-MQ, 2E 2E | E-MQ, 26 28 | E-MQ, 01 01 | 5-MQ, 02 02 | 4-MQ, 26 26 | 5-MQ, SE 5E | 5-MQ, 62 62 | P-MQ, 62 62 | 1-MQ. 27 27 | F-MQ, EZ EZ | 4-MQ, 62 62 | 23 23 DW-4 | 23 23 DW-4 | 16 16 'DW-4 | 9 9 DW-4 | 8 DW-4 | 5-MO. / / | 2-MQ, 22 E2 | 5-MQ, EZ EZ | 23 23 'DW-5 | 23 23 'DW-5 | 22 22 DW-5 | 9-MQ, 92 97 | 54 24 DW-6 | 24 24 'DW-6 | 9-MQ. 62 62 | 9-MQ, 62 62 | 9-MQ, 91 91 | 15 15 'DW-6 | 9-MO. 2 2 | 9-MQ, 2 2 | 9-MQ, L L | | | | | | | | |
| Track No Final Code Age | 24653128 CHWR | 24653167 CHWR | 24653179 CHWR | 24653185 D801 | 24589595 CHCI 4 | 24612696 CHSI | 24632678 CHSI | 24670128 CHSI | 24861265 CHTR | 24394009 DB0T | 24625780 DB0T | 24659788 DB0T | 24753078 DB0T | 24753079 DB0T | 24/55080 D801 | 24753085 DB0T | 24753086 D80T | 24753087 DB0T | 24753088 D80T | 24801921 CHTR | 24864781 CHTR | 24882446 CHTR | 2489687AD CHIR | 24753089 D80T | 24753090 DB0T | 24753091 D80T | 24753092 D80T | 24/62649 CHTR 24805816 FUTP | 24738908 D80D | 24738909 D80D | 24738910 D80D | | 24753093 DB0T | 24805647 CHTR | 24814144 D80T | 24896818 CHDR | 24896819 CHDR | 24896820 CHDR | | | | | | | | |

