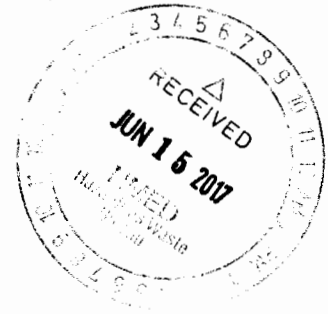


 **ENTERED**

June 8, 2017

John E. Kieling
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505



RE: Response to NMED's Letter dated 5/15/17

Dear Mr. Kieling:

Advanced Chemical Treatment, Inc. (ACTreatment) EPA ID# NMD002208627 would like to respond to the request for additional information in the letter dated June 15, 2017 regarding the release of hazardous waste that occurred on March 9, 2017.

1. Identify the exact location of the spill. Include:
 - a. If the spill was located within a trailer,
The initial spill was within the trailer that held two 55-gallon metal drums.
 - b. If the spill was contained by the trailer or if any contamination occurred outside the trailer,
Liquid material did leak from the bottom of the trailer as well as the trailer door. The material had spilled onto the asphalt of the parking area and pooled in the collection sump located in front of dock 2.
 - c. If the spill was confined to the trailer, provide an explanation for the samples taken
Sampling was conducted in the asphalt, but not within the trailer after the spill clean-up was complete. Samples were taken at 4ft., 25 ft., and 48ft. from the dock each at a depth of 2.5 inches and 6 inches respectively.
2. Include a map clearly showing the location of the spill as well as the sampling locations.
Please refer to Appendix A for a map that indicates the sampling locations and location of the spill.
3. The incident report lists the material spilled as D002 but the manifest lists both D002 and D004. Identify all constituents and applicable RCRA codes associated with the spill.
Two containers from Line item 1 from the manifest leaked in the trailer and does have an EPA waste code of both D002 & D004. Total constituents from the profile include:
 - Activated carbon (20-59%)
 - Arsenic (1-5%)
 - Phospine (0-1%)
 - Phosphorus (1-5%)
 - Water (30%)

Please refer to Appendix B for a copy of the manifest and waste profile sheet.

4. Identify the cause of the container leak and how long the container was at the facility before the leak was discovered.

The 55-gallon poly lined metal drums had an additional poly insert, but had degraded. Final determination was that the materials were being added to the drums with an elevated temperature causing the drum liners to degrade and leak. The trailer was accepted for processing the afternoon of March 7, 2017 and partial process of the trailer was conducted on March 8th, 2017. The spill was identified prior to the start of the business day March 9th, 2017. No external leaking of containers or presence of spillage was noticed on March 8th, 2017. The first indication of a spill was noticed by an employee while opening the warehouse up for the day on the morning of March 9, 2017 @ 705 AM.

5. Fully describe how and where this waste was managed and disposed. Note that this waste and any associated wash water must be included in the Facility's waste generation volume.

The leaking containers were immediately pulled from the trailer and over packed by our warehouse technicians. Spill containment procedures were conducted and all recovered materials were containerized, labeled (as ACT Treatment as the generator), and marked. The remaining 10 drums on line item 1 were also over packed and sent to an alternate facility for disposal. The waste and associated clean-up materials were manifest as ACT Treatment and will be counted against our generator volume.

6. Include the laboratory chemical analyses conducted on the samples and the rationale for the selected analyses.

Refer to Appendix C for a copy of the analytical report from Hall Environmental. The rationale for the selected analyses is EPA Method 6010B: TCLP Metals to check for elevated arsenic levels and SM4500-H+B: PH to check for any abnormal pH levels.

7. The incident report indicates that 7 to 10 gallons leaked from a drum; however, the volume recovered was not included. Include the total recovered volume.

The total recovered volume of materials was estimated to be between 6-7 gallons plus debris and materials generated during the spill response and clean up phases. All spill material was placed into the over packs with the drums that were sent to an alternate facility for disposal.

If NMED requires further information please contact myself or Krista Harsono at 619-571-5737 or KHarsono@ACTEnviro.com and I will respond in a timely manner.

Regards,



Jeffrey Smith
General Manager
Advanced Chemical Treatment

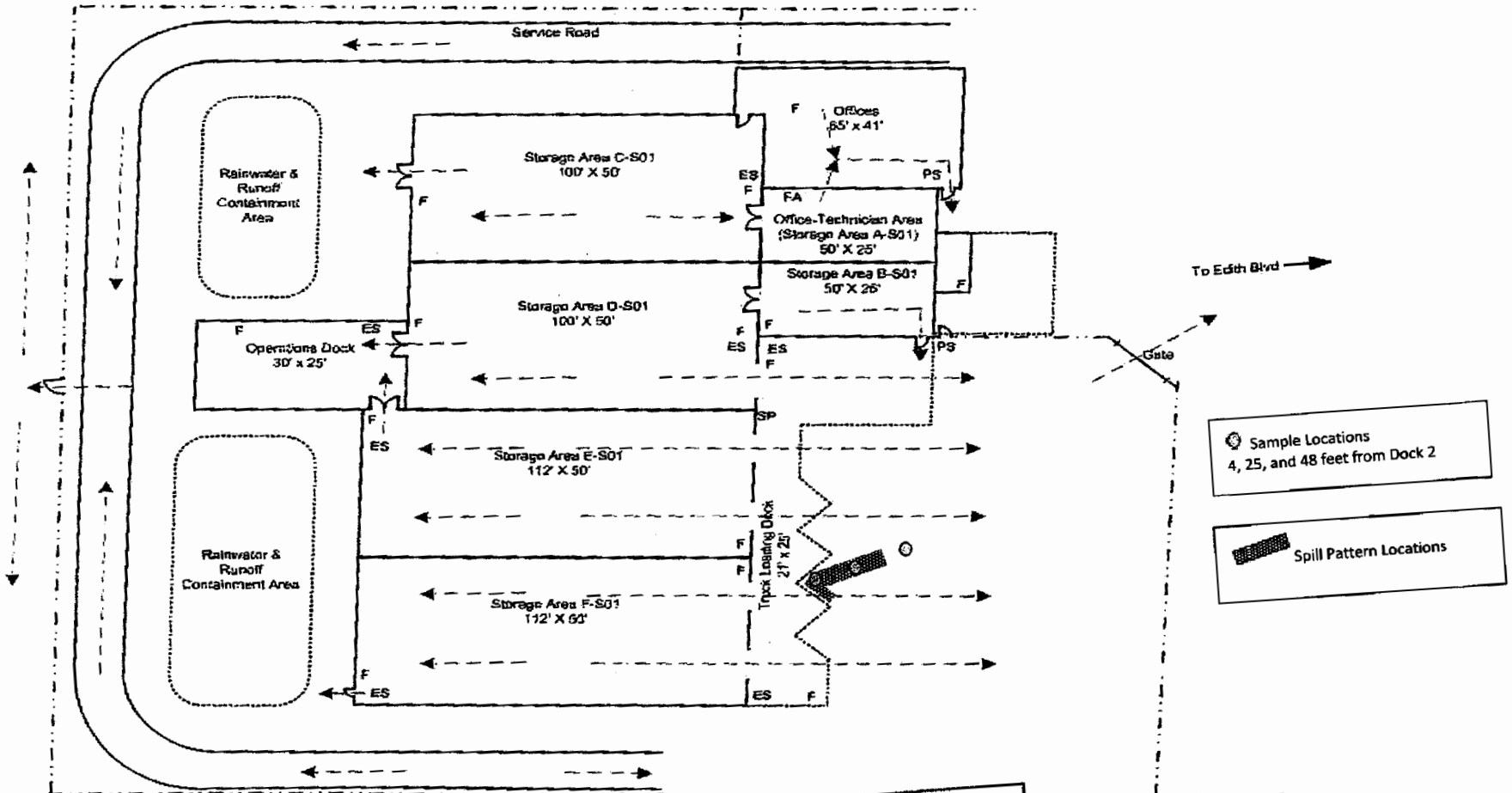
Enclosures

cc: P. Paduano, Advanced Chemical Transport/Treatment
K. Harsono, Advanced Chemical Transport/Treatment

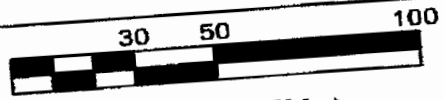
Appendix A

Map that indicates the sampling locations and location of the spill

03/20/14



Facility Evacuation Routes
Advanced Chemical Treatment
6137 Edith Blvd. NE
Albuquerque, NM 87107
October 10th, 2014



Scale: 1 inch equals 50 feet

ES=Emergency Shower
 F=Fire Extinguisher
 SP=Spill Kit
 PS=Pull Station
 FA=First Aid Kit
 Primary Evacuation Route
 Secondary Evacuation Route

Sample Locations
 4, 25, and 48 feet from Dock 2

Spill Pattern Locations



Appendix B

Hazardous Waste Manifest & Waste Profile Sheet

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NMR000002816	2. Page 1 of 1	3. Emergency Response Phone 505-820-6642	4. Manifest Tracking Number 009005965 FLE				
5. Generator Name and Site Address (if different than mailing address) SOLARCO TECHNOLOGIES CORP. 10420 RESEARCH ROAD SE ALBUQUERQUE, NM 87123 505 250 6268									
Generator's Phone: 6. Transporter 1 Company Name Advanced Chemical Transport Inc. (SV)					U.S. EPA ID Number CAR000070540				
7. Transporter 2 Company Name					U.S. EPA ID Number				
8. Designated Facility Name and Site Address Advanced Chemical Treatment 6133 Edith Blvd NE Albuquerque, NM 87107 505-349-5220					U.S. EPA ID Number NMD002208627				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Container No. Type		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes	
	X	RQ, UN2922, Waste Corrosive liquids, toxic, n.o.s. (ARSENIC, PHOSPHOROUS), 8 (6.1), PGII (D002)		12 DM		5940	P	D002	D004
	X	RQ, NA3077, Hazardous waste, solid, n.o.s. (ARSENIC CONTAMINATED PPE), 9, PGIII (D004)		1 DF		41	P	D004	
		3.							
		4.							
14. Special Handling Instructions and Additional Information 1) ERG#154; RC8077 SOA- (12) DMSS Project Number 120446 Document #: D143015 2) ERG#171; RC8078 SOA- (1) DESS EMERGENCY CONTACT: HENRY ROMERO @ 505-820-6642									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA-Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 282.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Officer's Printed/Typed Name Henry Romero for Solarco				Signature <i>Henry Romero</i>		Month Day Year 03 03 17			
TRANSPORTER INTL.	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.			Port of entry/exit: Date leaving U.S.:					
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Jerome Cooper Signature <i>Jerome Cooper</i> Month Day Year 03 03 17								
DESIGNATED FACILITY	18. Discrepancy. 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input checked="" type="checkbox"/> Full Rejection Manifest Reference Number:								
	18b. Alternate Facility (or Generator) US Ecology P.O. Box 878, Hwy 95, 11 miles S Beatty.					U.S. EPA ID Number NVT 330010000			
	Facility's Phone: 776 751-6788					18c. Signature of Alternate Facility (or Generator) Month Day Year			
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2. 3. 4.								
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Signature Month Day Year									



6133 Edith Blvd. NE
 Albuquerque, NM 87107
 Phone: (505) 349-5220
 Fax: (505) 344-7986

GENERATOR WASTE PROFILE SHEET

A. GENERATOR INFORMATION

Generator Name: **BOLAERO TECHNOLOGIES CORP.**
 Mailing Address: **10420 RESEARCH ROAD SE
 ALBUQUERQUE, NM 87123**
 Site Pick-up Address: **10420 RESEARCH ROAD SE
 ALBUQUERQUE, NM 87123**
 Technical Contact: **HENRY ROMERO** Title: **MAIN CONTACT**
 Name of Waste: **TGA CARBON-ARSENIC WASTE - DO NOT RECERTIFY PER JAS**
 Process Generating: **REMOVAL OF CARBON FROM TOXIC GAS ABSORBERS**

Profile Number: **RC8077**
 Generator US EPA ID: **NMR000002816**
 Phone: **505-250-8288**
 Fax:
 Email:

NAICS CODE: **334413** Form Code: **W002** Source Code: **G13**

B. PHYSICAL CHARACTERISTICS OF WASTE AT 25C OF 77F

Physical State: **SLUDGE / S** Color: **BLACK** Clarity: **CLEAR** Phase Separation: **MULTI** Odor: **NONE**
 Number of Layers:
 PH: **1 - 7** Specific Gravity: **1 - 1.2 SP.GR.** Flash Point: **> 200 F (F)** BTU Value: **100 - 500 BTU/LB**

C. Chemical Composition / UHC's

BASED UPON: ANALYTICAL (INCLUDED) GENERATOR KNOWLEDGE

	Range	
ACTIVATED CARBON	20 - 50	%
ARSENIC	1 - 5	%
PHOSPHINE	0 - 1	%
PHOSPHOROUS (PHOSPHORIC ACID)	1 - 5	%
WATER	30 - 30	%

D. METALS

	Total (PPM)	EP Toxicity (mg/l)
= 500 MG/L Arsenic:		< 5 MG/L Silver:
< 100 MG/L Barium:		< MG/L Copper:
< 5 MG/L Cadmium:		< MG/L Nickel:
< 5 MG/L Chromium:		< MG/L Zinc:
< 5 MG/L Lead:		< MG/L Thallium:
< 2 MG/L Mercury:		
< MG/L Chromium, Hexavalent		
< 1 MG/L Selenium:		

E. OTHER COMPONENTS

OXIDIZER:	N	REACTIVE SULFIDES PPM	N
EXPLOSIVE:	N	REACTIVE CYANIDES PPM	N
SHOCK SENSITIVE:	N	WATER/AIR REACTIVE	Y
TIRES:	N	THERMALLY UNSTABLE	N
PYROPHORIC:	N	TSCA REG PCB WASTE:	N
RADIOACTIVE:	N	COMPRESSED GASSES:	N
EXEMPT RAD:	N	CERCLA/SUPERFUND:	N
ETHIOLOGICAL:	N	PESTICIDE	N
		MANUFACTURING WASTE:	N

HALOGENATED ORGANIC COMPOUNDS PER 40 CFR 268, APPENDIX III
 DEBRIS N <500 PPM VOC as generated NO

Subject to NESHAP Regulations
 US EPA Hazardous Waste Y
 US EPA Hazardous Waste ; D002, D004
 Codes:

F. Shipping Information:

DOT Hazardous Material: **YES** Exempted: **NO**
 Proper Shipping Name: **RQ, UN2822, Waste Corrosive Liquids, toxic, n.o.s. (ARSENIC, PHOSPHOROUS), 8 (6.1), PGI1 (D002)**
 Hazard Class: **8**
 ID #: **UN2822**
 PG: **II**
 Anticipated Volume (Units): **32 DM**
 Per: **MONTH**

G. Special Handling Instructions:

STABILIZATION

H. GENERATOR'S CERTIFICATION:

I hereby certify that all information in this and all the attached documents is complete and accurate, and that all known or suspected hazards have been disclosed. I further certify that any samples submitted with this profile are representative of the waste to be shipped and are taken in accordance with SW 846 or other approved procedures. I agree to notify Advanced Chemical Treatment in writing when the process generating this waste stream changes or when I have reason to believe the data contained herein is not complete and accurate.

Signature _____ Title _____ Date _____
 Print Name: _____

Appendix C

Analytical Report from Hall Environmental



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

March 15, 2017

Kris Gwash

Advanced Chemical Transport Alb
6137 Edith Blvd NE

Albuquerque, NM 87107

TEL: (719) 466-9328

FAX

RE: T 1097 Leak

OrderNo.: 1703483

Dear Kris Gwash:

Hall Environmental Analysis Laboratory received 6 sample(s) on 3/9/2017 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

A handwritten signature in black ink, appearing to read 'Andy Freeman', is written over a horizontal line.

Andy Freeman

Laboratory Manager

4901 Hawkins NE

Albuquerque, NM 87109

Analytical Report

Lab Order 1703483

Date Reported: 3/15/2017

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Advanced Chemical Transport Alb

Client Sample ID: 2.5-1 (Dock)

Project: T 1097 Leak

Collection Date: 3/9/2017 11:30:00 AM

Lab ID: 1703483-001

Matrix: SOIL

Received Date: 3/9/2017 12:06:00 PM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
MERCURY, TCLP							Analyst: pmf
Mercury	ND	0.020		mg/L	1	3/14/2017 2:21:08 PM	30661
EPA METHOD 6010B: TCLP METALS							Analyst: pmf
Arsenic	ND	5.0		mg/L	1	3/13/2017 11:21:11 PM	30640
Barium	ND	100		mg/L	1	3/13/2017 11:21:11 PM	30640
Cadmium	ND	1.0		mg/L	1	3/13/2017 11:21:11 PM	30640
Chromium	ND	5.0		mg/L	1	3/13/2017 11:21:11 PM	30640
Lead	ND	5.0		mg/L	1	3/13/2017 11:21:11 PM	30640
Selenium	ND	1.0		mg/L	1	3/13/2017 11:21:11 PM	30640
Silver	ND	5.0		mg/L	1	3/13/2017 11:21:11 PM	30640
SM4500-H+B: PH							Analyst: JRR
pH	7.34			pH Units	1	3/13/2017 3:31:00 PM	R41334

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	E Value above quantitation range
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Advanced Chemical Transport Alb **Client Sample ID:** 6-1 (Dock)
Project: T 1097 Leak **Collection Date:** 3/9/2017 11:30:00 AM
Lab ID: 1703483-002 **Matrix:** SOIL **Received Date:** 3/9/2017 12:06:00 PM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
MERCURY, TCLP							Analyst: pmf
Mercury	ND	0.020		mg/L	1	3/14/2017 2:22:54 PM	30681
EPA METHOD 6010B: TCLP METALS							Analyst: pmf
Arsenic	ND	5.0		mg/L	1	3/13/2017 11:36:23 PM	30640
Barium	ND	100		mg/L	1	3/13/2017 11:36:23 PM	30640
Cadmium	ND	1.0		mg/L	1	3/13/2017 11:36:23 PM	30640
Chromium	ND	5.0		mg/L	1	3/13/2017 11:36:23 PM	30640
Lead	ND	5.0		mg/L	1	3/13/2017 11:36:23 PM	30640
Selenium	ND	1.0		mg/L	1	3/13/2017 11:36:23 PM	30640
Silver	ND	5.0		mg/L	1	3/13/2017 11:36:23 PM	30640
SM4500-H+B: PH							Analyst: JRR
pH	8.11			pH Units	1	3/13/2017 3:31:00 PM	R41334

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	E Value above quantitation range
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Advanced Chemical Transport Alb
 Project: T 1097 Leak
 Lab ID: 1703483-003

Client Sample ID: 2.5-2 (Middle)
 Collection Date: 3/9/2017 11:30:00 AM
 Received Date: 3/9/2017 12:06:00 PM

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
MERCURY, TCLP							Analyst: pmf
Mercury	ND	0.020		mg/L	1	3/14/2017 2:28:13 PM	30661
EPA METHOD 6010B: TCLP METALS							Analyst: pmf
Arsenic	ND	5.0		mg/L	1	3/13/2017 11:38:06 PM	30640
Barium	ND	100		mg/L	1	3/13/2017 11:38:06 PM	30640
Cadmium	ND	1.0		mg/L	1	3/13/2017 11:38:06 PM	30640
Chromium	ND	5.0		mg/L	1	3/13/2017 11:38:06 PM	30640
Lead	ND	5.0		mg/L	1	3/13/2017 11:38:06 PM	30640
Selenium	ND	1.0		mg/L	1	3/13/2017 11:38:06 PM	30640
Silver	ND	5.0		mg/L	1	3/13/2017 11:38:06 PM	30640
SM4500-H+B: PH							Analyst: JRR
pH	7.98			pH Units	1	3/13/2017 3:31:00 PM	R41334

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	E Value above quantitation range
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Advanced Chemical Transport Alb Client Sample ID: 6-2 (Middle)
 Project: T 1097 Leak Collection Date: 3/9/2017 11:30:00 AM
 Lab ID: 1703483-004 Matrix: SOIL Received Date: 3/9/2017 12:06:00 PM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
MERCURY, TCLP							Analyst: pmf
Mercury	ND	0.020		mg/L	1	3/14/2017 2:30:01 PM	30661
EPA METHOD 6010B: TCLP METALS							Analyst: pmf
Arsenic	ND	5.0		mg/L	1	3/14/2017 3:57:15 PM	30640
Barium	ND	100		mg/L	1	3/14/2017 3:57:15 PM	30640
Cadmium	ND	1.0		mg/L	1	3/14/2017 5:01:36 PM	30620
Chromium	ND	5.0		mg/L	1	3/14/2017 3:57:15 PM	30640
Lead	ND	5.0		mg/L	1	3/14/2017 3:57:15 PM	30640
Selenium	ND	1.0		mg/L	1	3/14/2017 3:57:15 PM	30640
Silver	ND	5.0		mg/L	1	3/14/2017 3:57:15 PM	30640
SM4500-H+B: PH							Analyst: JRR
pH	9.13			pH Units	1	3/13/2017 3:31:00 PM	R41334

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:		
*	Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E Value above quantitation range
H	Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P Sample pH Not In Range
R	RPD outside accepted recovery limits	RL Reporting Detection Limit
S	% Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Advanced Chemical Transport Alb Client Sample ID: 2.5-3 (Clean)
 Project: T 1097 Leak Collection Date: 3/9/2017 11:30:00 AM
 Lab ID: 1703483-005 Matrix: SOIL Received Date: 3/9/2017 12:06:00 PM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
MERCURY, TCLP							Analyst: pmf
Mercury	ND	0.020		mg/L	1	3/14/2017 2:31:49 PM	30661
EPA METHOD 6010B: TCLP METALS							Analyst: pmf
Arsenic	ND	5.0		mg/L	1	3/13/2017 11:50:21 PM	30640
Barium	ND	100		mg/L	1	3/13/2017 11:50:21 PM	30640
Cadmium	ND	1.0		mg/L	1	3/13/2017 11:50:21 PM	30640
Chromium	ND	5.0		mg/L	1	3/13/2017 11:50:21 PM	30640
Lead	ND	5.0		mg/L	1	3/13/2017 11:50:21 PM	30640
Selenium	ND	1.0		mg/L	1	3/13/2017 11:50:21 PM	30640
Silver	ND	5.0		mg/L	1	3/13/2017 11:50:21 PM	30640
SM4500-H+B: PH							Analyst: JRR
pH	8.80			pH Units	1	3/13/2017 3:31:00 PM	R41334

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	E Value above quantitation range
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Advanced Chemical Transport Alb Client Sample ID: 6-3 (Clean)
 Project: T 1097 Leak Collection Date: 3/9/2017 11:30:00 AM
 Lab ID: 1703483-006 Matrix: SOIL Received Date: 3/9/2017 12:06:00 PM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
MERCURY, TCLP							Analyst: pmf
Mercury	ND	0.020		mg/L	1	3/14/2017 2:33:37 PM	30661
EPA METHOD 6010B: TCLP METALS							Analyst: pmf
Arsenic	ND	5.0		mg/L	1	3/13/2017 11:52:04 PM	30640
Barium	ND	100		mg/L	1	3/13/2017 11:52:04 PM	30640
Cadmium	ND	1.0		mg/L	1	3/13/2017 11:52:04 PM	30640
Chromium	ND	5.0		mg/L	1	3/13/2017 11:52:04 PM	30640
Lead	ND	5.0		mg/L	1	3/13/2017 11:52:04 PM	30640
Selenium	ND	1.0		mg/L	1	3/13/2017 11:52:04 PM	30640
Silver	ND	5.0		mg/L	1	3/13/2017 11:52:04 PM	30640
SM4500-H+B: PH							Analyst: JRR
pH	8.63			pH Units	1	3/13/2017 3:31:00 PM	R41334

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	E Value above quantitation range
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1703483

15-Mar-17

Client: Advanced Chemical Transport Alb

Project: T 1097 Leak

Sample ID	MB-30661	SampType:	MBLK	TestCode:	MERCURY, TCLP					
Client ID:	PBW	Batch ID:	30661	RunNo:	41367					
Prep Date:	3/13/2017	Analysis Date:	3/14/2017	SeqNo:	1296438	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Mercury	ND	0.020								

Sample ID	LCS-30661	SampType:	LCS	TestCode:	MERCURY, TCLP					
Client ID:	LCSW	Batch ID:	30661	RunNo:	41367					
Prep Date:	3/13/2017	Analysis Date:	3/14/2017	SeqNo:	1296439	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Mercury	ND	0.020	0.005000	0	95.5	80	120			

Sample ID	1703483-002AMS	SampType:	MS	TestCode:	MERCURY, TCLP					
Client ID:	6-1 (Dock)	Batch ID:	30661	RunNo:	41367					
Prep Date:	3/13/2017	Analysis Date:	3/14/2017	SeqNo:	1296442	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Mercury	ND	0.020	0.005000	0	97.7	75	125			

Sample ID	1703483-002AMSD	SampType:	MSD	TestCode:	MERCURY, TCLP					
Client ID:	6-1 (Dock)	Batch ID:	30661	RunNo:	41367					
Prep Date:	3/13/2017	Analysis Date:	3/14/2017	SeqNo:	1296443	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Mercury	ND	0.020	0.005000	0	98.9	75	125	0	20	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1703483

15-Mar-17

Client: Advanced Chemical Transport Alb
Project: T 1097 Leak

Sample ID	MB-30640	SampType:	MBLK	TestCode:	EPA Method 6010B: TCLP Metals					
Client ID:	PBW	Batch ID:	30640	RunNo:	41345					
Prep Date:	3/10/2017	Analysis Date:	3/13/2017	SeqNo:	1295668	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	ND	5.0								
Barium	ND	100								
Cadmium	ND	1.0								
Chromium	ND	5.0								
Lead	ND	5.0								
Selenium	ND	1.0								
Silver	ND	5.0								

Sample ID	LCS-30640	SampType:	LCS	TestCode:	EPA Method 6010B: TCLP Metals					
Client ID:	LCSW	Batch ID:	30640	RunNo:	41345					
Prep Date:	3/10/2017	Analysis Date:	3/13/2017	SeqNo:	1295669	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	ND	5.0	0.5000	0	99.7	80	120			
Barium	ND	100	0.5000	0	100	80	120			
Cadmium	ND	1.0	0.5000	0	102	80	120			
Chromium	ND	5.0	0.5000	0	97.7	80	120			
Lead	ND	5.0	0.5000	0	93.5	80	120			
Selenium	ND	1.0	0.5000	0	98.0	80	120			
Silver	ND	5.0	0.1000	0	101	80	120			

Sample ID	1703483-001AMS	SampType:	MS	TestCode:	EPA Method 6010B: TCLP Metals					
Client ID:	2.5-1 (Dock)	Batch ID:	30640	RunNo:	41345					
Prep Date:	3/10/2017	Analysis Date:	3/13/2017	SeqNo:	1295673	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	ND	5.0	0.5000	0.02447	99.6	75	125			
Barium	ND	100	0.5000	0.4949	101	75	125			
Cadmium	ND	1.0	0.5000	0.001620	102	75	125			
Chromium	ND	5.0	0.5000	0.004310	94.4	75	125			
Lead	ND	5.0	0.5000	0	90.6	75	125			
Selenium	ND	1.0	0.5000	0	95.3	75	125			
Silver	ND	5.0	0.1000	0	100	75	125			

Sample ID	1703483-001AMSD	SampType:	MSD	TestCode:	EPA Method 6010B: TCLP Metals					
Client ID:	2.5-1 (Dock)	Batch ID:	30640	RunNo:	41345					
Prep Date:	3/10/2017	Analysis Date:	3/13/2017	SeqNo:	1295674	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	ND	5.0	0.5000	0.02447	101	75	125	0	20	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1703483

15-Mar-17

Client: Advanced Chemical Transport Alb

Project: T 1097 Leak

Sample ID	1703483-001AMSD	SampType:	MSD	TestCode:	EPA Method 6010B: TCLP Metals					
Client ID:	2.5-1 (Dock)	Batch ID:	30640	RunNo:	41345					
Prep Date:	3/10/2017	Analysis Date:	3/13/2017	SeqNo:	1295674	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Barium	ND	100	0.5000	0.4949	101	75	125	0	20	
Cadmium	ND	1.0	0.5000	0.001620	102	75	125	0	20	
Chromium	ND	5.0	0.5000	0.004310	94.3	75	125	0	20	
Lead	ND	5.0	0.5000	0	90.8	75	125	0	20	
Selenium	ND	1.0	0.5000	0	95.9	75	125	0	20	
Silver	ND	5.0	0.1000	0	99.9	75	125	0	20	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1703483

15-Mar-17

Client: Advanced Chemical Transport Alb

Project: T 1097 Leak

Sample ID	1703483-001ADUP	SampType:	DUP	TestCode:	SM4500-H+B: pH					
Client ID:	2.5-1 (Dock)	Batch ID:	R41334	RunNo:	41334					
Prep Date:		Analysis Date:	3/13/2017	SeqNo:	1295186	Units:	pH Units			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
pH	7.40									

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

Chain-of-Custody Record



HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Client: ART TREATMENT

Turn-Around Time:

Standard Rush

Mailing Address: 10137 EDITH BLVD NE
Albuquerque NM 87107

Project Name: T-1097 LEAK.

Phone #: 505-349-5200

Project #: T-1097

email or Fax#: Kjwast@arttreatment.com

Project Manager: Kels Cushman

QA/QC Package:
 Standard Level 4 (Full Validation)

Sampler: Jeff Smith

Accreditation
 NELAP Other _____

On Site: Yes No

EDD (Type) _____

Sample Temperature: 15.6

Analysis Request:

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEALING- 1703183	BTEX + MTBE + TMB's (8021)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / MRO)	TPH (Method 418.1)	EDB (Method 504.1)	PAH's (8310 or 8270 SIMS)	*RCRA 8 Metals <u>TLCP*</u>	Anions (F, Cl, NO ₃ , NO ₂ , PO ₄ , SO ₄)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	PH	Air Bubbles (Y or N)
<u>3/1/17</u>	<u>1130</u>	<u>Soil</u>	<u>2.5-1 (rock)</u>	<u>Glass 1</u>	<u>-</u>	<u>-001</u>							<u>X</u>					<u>X</u>	
			<u>6-1 (rock)</u>	<u>1</u>		<u>-002</u>							<u>X</u>					<u>X</u>	
			<u>2.5-2 (mud)</u>	<u>2</u>		<u>-003</u>							<u>X</u>					<u>X</u>	
			<u>6-2 (mud)</u>	<u>2</u>		<u>-004</u>							<u>X</u>					<u>X</u>	
			<u>2.5-3 (clean)</u>	<u>3</u>		<u>-005</u>							<u>X</u>					<u>X</u>	
			<u>6-3 (clean)</u>	<u>3</u>		<u>-006</u>							<u>X</u>					<u>X</u>	

Date: 3/9/17 Time: 1206 Reinquished by: [Signature]
 Received by: [Signature] Date: 03/09/17 Time: 1206

Remarks:

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.