



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
October 12, 2010



Ms. Tiffany McCoy
Compliance Enforcement Section (6EN-HE)
Hazardous Waste Enforcement Branch
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Subject: EPA RCRA Compliance Inspection EPA ID# NM3890139088

Dear Ms. McCoy:

The purpose of this letter is to respond to the letter from the Environmental Protection Agency (EPA) dated August 18, 2010 and the Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection Report for the Waste Isolation Pilot Plant (WIPP) conducted by Mr. Ryan Rosser on May 25-26, 2010. I am providing this letter to you based on a recommendation from Mr. Rosser to Dan Ferguson, of my staff, during a September 24, 2010 telephone conversation. The August 18, 2010 letter stated, "there are areas of concern identified at your facility for which EPA may take enforcement action under the Resource Conservation and Recovery Act (RCRA)." The concern in the Inspection Report stated,

During the inspection, it was noted by the EPA Inspector the facility collects storm water run-off in Evaporation Pond A, Pond 1 and Pond 2. Storm water has the potential to pick up contaminants from the facility before discharging into the ponds. Water from these ponds is used as a dust suppressant at the facility. The last sampling and analysis event performed by the facility was in 2005. The facility has continued to use the storm water as a dust suppressant without sample and analysis prior to each event.

The surface water run-off at the WIPP site is monitored annually for chlorides, sulfates and total dissolved solids. The water from the Evaporation Ponds A, 1 and 2 was sampled on August 30, 2010 for constituents on the RCRA toxicity characteristic list in 40 CFR 261.24. As indicated on the enclosed analytical results, the concentrations of RCRA hazardous constituents were all non-detectable.

Please call Daniel J. Ferguson at (575) 234-7018 if you have any questions or to discuss this topic further.

Sincerely,


George T. Basabilvazo, Director
Office of Regulatory Compliance

Enclosure



Tiffany McCoy

-2-

October 12, 2010

cc: w/enclosure

R. Smith, EPA	* ED
A. Vollmer, NMED	ED
CBFO M&RC	

cc: w/o enclosure

E. Ziemianski, CBFO	ED
G. Hellstrom, CBFO	ED
D. Ferguson, CBFO	ED
S. McCauslin, CBFO	ED
R. Patterson, CBFO	ED
A. Stone, CBFO	ED
F. Sharif, WTS	ED
R. Chavez, WRES	ED
D. Cook, WTS	ED
R. Smith, EPA	ED

*ED denotes electronic distribution

**Attachment 1: Hazardous Waste Characterization
Analysis**

Hall Environmental Analysis Laboratory, Inc.

Date: 23-Sep-10

CLIENT: Waste Isolation Pilot Plant
Lab Order: 1009129
Project: T409304-3
Lab ID: 1009129-01

Client Sample ID: WST-10-095
Collection Date: 8/30/2010 9:35:00 AM
Date Received: 8/31/2010
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8081: PESTICIDES TCLP						Analyst: JDC
Chlordane	ND	0.030		mg/L	1	9/8/2010 3:32:24 PM
Endrin	ND	0.020		mg/L	1	9/8/2010 3:32:24 PM
gamma-BHC (Lindane)	ND	0.40		mg/L	1	9/8/2010 3:32:24 PM
Heptachlor	ND	0.0080		mg/L	1	9/8/2010 3:32:24 PM
Heptachlor epoxide	ND	0.0080		mg/L	1	9/8/2010 3:32:24 PM
Methoxychlor	ND	10		mg/L	1	9/8/2010 3:32:24 PM
Toxaphene	ND	0.50		mg/L	1	9/8/2010 3:32:24 PM
Surr: Decachlorobiphenyl	113	47.3-125		%REC	1	9/8/2010 3:32:24 PM
Surr: Tetrachloro-m-xylene	114	35.7-135		%REC	1	9/8/2010 3:32:24 PM
EPA METHOD 300.0: ANIONS						Analyst: LJB
Chloride	630	25		mg/L	50	9/18/2010 5:57:06 AM
EPA METHOD 7470: MERCURY						Analyst: ELS
Mercury	ND	0.020		mg/L	1	9/20/2010 3:34:54 PM
EPA 6010B: TOTAL RECOVERABLE METALS						Analyst: SNV
Arsenic	ND	5.0		mg/L	1	9/16/2010 12:43:30 PM
Barium	ND	100		mg/L	1	9/16/2010 12:43:30 PM
Cadmium	ND	1.0		mg/L	1	9/16/2010 12:43:30 PM
Chromium	ND	5.0		mg/L	1	9/16/2010 12:43:30 PM
Lead	ND	5.0		mg/L	1	9/16/2010 12:43:30 PM
Selenium	ND	1.0		mg/L	1	9/16/2010 12:43:30 PM
Silver	ND	5.0		mg/L	1	9/16/2010 12:43:30 PM
EPA METHOD 8270C TCLP						Analyst: JDC
2,4-Dinitrotoluene	ND	0.13		mg/L	1	9/8/2010 12:21:31 PM
Hexachlorobenzene	ND	0.13		mg/L	1	9/8/2010 12:21:31 PM
Hexachlorobutadiene	ND	0.50		mg/L	1	9/8/2010 12:21:31 PM
Hexachloroethane	ND	3.0		mg/L	1	9/8/2010 12:21:31 PM
Nitrobenzene	ND	2.0		mg/L	1	9/8/2010 12:21:31 PM
Pentachlorophenol	ND	100		mg/L	1	9/8/2010 12:21:31 PM
Pyridine	ND	5.0		mg/L	1	9/8/2010 12:21:31 PM
2,4,5-Trichlorophenol	ND	400		mg/L	1	9/8/2010 12:21:31 PM
2,4,6-Trichlorophenol	ND	2.0		mg/L	1	9/8/2010 12:21:31 PM
Cresols, Total	ND	200		mg/L	1	9/8/2010 12:21:31 PM
Surr: 2,4,6-Tribromophenol	58.0	20.9-128		%REC	1	9/8/2010 12:21:31 PM
Surr: 2-Fluorobiphenyl	65.2	18.3-119		%REC	1	9/8/2010 12:21:31 PM
Surr: 2-Fluorophenol	37.5	16.6-101		%REC	1	9/8/2010 12:21:31 PM
Surr: 4-Terphenyl-d14	75.8	32.3-135		%REC	1	9/8/2010 12:21:31 PM
Surr: Nitrobenzene-d5	69.5	22.6-117		%REC	1	9/8/2010 12:21:31 PM

Qualifiers:

* Value exceeds Maximum Contaminant Level
 E Estimated value
 J Analyte detected below quantitation limits
 NC Non-Chlorinated
 PQL Practical Quantitation Limit

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 MCL Maximum Contaminant Level
 ND Not Detected at the Reporting Limit
 S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: 23-Sep-10

CLIENT: Waste Isolation Pilot Plant
Lab Order: 1009129
Project: T409304-3
Lab ID: 1009129-01

Client Sample ID: WST-10-095
Collection Date: 8/30/2010 9:35:00 AM
Date Received: 8/31/2010
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8270C TCLP						Analyst: JDC
Surr: Phenol-d5	33.2	8-77.9		%REC	1	9/8/2010 12:21:31 PM
TCLP VOLATILES BY 8260B						Analyst: MMS
Benzene	ND	0.50		mg/L	1	9/9/2010 5:16:12 PM
2-Butanone	ND	10		mg/L	1	9/9/2010 5:16:12 PM
Carbon Tetrachloride	ND	0.50		mg/L	1	9/9/2010 5:16:12 PM
Chlorobenzene	ND	100		mg/L	1	9/9/2010 5:16:12 PM
Chloroform	ND	6.0		mg/L	1	9/9/2010 5:16:12 PM
1,4-Dichlorobenzene	ND	7.5		mg/L	1	9/9/2010 5:16:12 PM
1,2-Dichloroethane (EDC)	ND	0.50		mg/L	1	9/9/2010 5:16:12 PM
1,1-Dichloroethene	ND	0.70		mg/L	1	9/9/2010 5:16:12 PM
Hexachlorobutadiene	ND	0.50		mg/L	1	9/9/2010 5:16:12 PM
Tetrachloroethene (PCE)	ND	0.70		mg/L	1	9/9/2010 5:16:12 PM
Trichloroethene (TCE)	ND	0.50		mg/L	1	9/9/2010 5:16:12 PM
Vinyl chloride	ND	0.20		mg/L	1	9/9/2010 5:16:12 PM
Surr: 1,2-Dichloroethane-d4	76.4	69.9-130		%REC	1	9/9/2010 5:16:12 PM
Surr: 4-Bromofluorobenzene	95.2	71.2-123		%REC	1	9/9/2010 5:16:12 PM
Surr: Dibromofluoromethane	89.8	73.9-134		%REC	1	9/9/2010 5:16:12 PM
Surr: Toluene-d8	95.7	81.9-122		%REC	1	9/9/2010 5:16:12 PM
SM4500-H+B: PH						Analyst: NSB
pH	8.88	0.100		pH units	1	9/3/2010 9:50:00 PM
SM2540C MOD: TOTAL DISSOLVED SOLIDS						Analyst: SNV
Total Dissolved Solids	1000	20.0		mg/L	1	9/7/2010 12:49:00 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: 23-Sep-10

CLIENT: Waste Isolation Pilot Plant	Client Sample ID: WST-10-096
Lab Order: 1009129	Collection Date: 8/30/2010 9:54:00 AM
Project: T409304-3	Date Received: 8/31/2010
Lab ID: 1009129-02	Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8081: PESTICIDES TCLP						Analyst: JDC
Chlordane	ND	0.030		mg/L	1	9/8/2010 4:24:02 PM
Endrin	ND	0.020		mg/L	1	9/8/2010 4:24:02 PM
gamma-BHC (Lindane)	ND	0.40		mg/L	1	9/8/2010 4:24:02 PM
Heptachlor	ND	0.0080		mg/L	1	9/8/2010 4:24:02 PM
Heptachlor epoxide	ND	0.0080		mg/L	1	9/8/2010 4:24:02 PM
Methoxychlor	ND	10		mg/L	1	9/8/2010 4:24:02 PM
Toxaphene	ND	0.50		mg/L	1	9/8/2010 4:24:02 PM
Surr: Decachlorobiphenyl	112	47.3-125		%REC	1	9/8/2010 4:24:02 PM
Surr: Tetrachloro-m-xylene	107	35.7-135		%REC	1	9/8/2010 4:24:02 PM
EPA METHOD 300.0: ANIONS						Analyst: LJB
Chloride	130	10		mg/L	20	9/3/2010 8:31:21 AM
EPA METHOD 7470: MERCURY						Analyst: ELS
Mercury	ND	0.020		mg/L	1	9/20/2010 3:40:26 PM
EPA 6010B: TOTAL RECOVERABLE METALS						Analyst: SNV
Arsenic	ND	5.0		mg/L	1	9/16/2010 1:09:55 PM
Barium	ND	100		mg/L	1	9/16/2010 1:09:55 PM
Cadmium	ND	1.0		mg/L	1	9/16/2010 1:09:55 PM
Chromium	ND	5.0		mg/L	1	9/16/2010 1:09:55 PM
Lead	ND	5.0		mg/L	1	9/16/2010 1:09:55 PM
Selenium	ND	1.0		mg/L	1	9/16/2010 1:09:55 PM
Silver	ND	5.0		mg/L	1	9/16/2010 1:09:55 PM
EPA METHOD 8270C TCLP						Analyst: JDC
2,4-Dinitrotoluene	ND	0.13		mg/L	1	9/8/2010 1:53:14 PM
Hexachlorobenzene	ND	0.13		mg/L	1	9/8/2010 1:53:14 PM
Hexachlorobutadiene	ND	0.50		mg/L	1	9/8/2010 1:53:14 PM
Hexachloroethane	ND	3.0		mg/L	1	9/8/2010 1:53:14 PM
Nitrobenzene	ND	2.0		mg/L	1	9/8/2010 1:53:14 PM
Pentachlorophenol	ND	100		mg/L	1	9/8/2010 1:53:14 PM
Pyridine	ND	5.0		mg/L	1	9/8/2010 1:53:14 PM
2,4,5-Trichlorophenol	ND	400		mg/L	1	9/8/2010 1:53:14 PM
2,4,6-Trichlorophenol	ND	2.0		mg/L	1	9/8/2010 1:53:14 PM
Cresols, Total	ND	200		mg/L	1	9/8/2010 1:53:14 PM
Surr: 2,4,6-Tribromophenol	74.4	20.9-128		%REC	1	9/8/2010 1:53:14 PM
Surr: 2-Fluorobiphenyl	66.0	18.3-119		%REC	1	9/8/2010 1:53:14 PM
Surr: 2-Fluorophenol	39.5	16.6-101		%REC	1	9/8/2010 1:53:14 PM
Surr: 4-Terphenyl-d14	84.4	32.3-135		%REC	1	9/8/2010 1:53:14 PM
Surr: Nitrobenzene-d5	58.2	22.6-117		%REC	1	9/8/2010 1:53:14 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: 23-Sep-10

CLIENT: Waste Isolation Pilot Plant
Lab Order: 1009129
Project: T409304-3
Lab ID: 1009129-02

Client Sample ID: WST-10-096
Collection Date: 8/30/2010 9:54:00 AM
Date Received: 8/31/2010
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8270C TCLP						
Surr: Phenol-d5	31.9	8-77.9	%REC		1	9/8/2010 1:53:14 PM
TCLP VOLATILES BY 8260B						
Benzene	ND	0.50	mg/L		1	9/9/2010 5:44:27 PM
2-Butanone	ND	10	mg/L		1	9/9/2010 5:44:27 PM
Carbon Tetrachloride	ND	0.50	mg/L		1	9/9/2010 5:44:27 PM
Chlorobenzene	ND	100	mg/L		1	9/9/2010 5:44:27 PM
Chloroform	ND	6.0	mg/L		1	9/9/2010 5:44:27 PM
1,4-Dichlorobenzene	ND	7.5	mg/L		1	9/9/2010 5:44:27 PM
1,2-Dichloroethane (EDC)	ND	0.50	mg/L		1	9/9/2010 5:44:27 PM
1,1-Dichloroethene	ND	0.70	mg/L		1	9/9/2010 5:44:27 PM
Hexachlorobutadiene	ND	0.50	mg/L		1	9/9/2010 5:44:27 PM
Tetrachloroethene (PCE)	ND	0.70	mg/L		1	9/9/2010 5:44:27 PM
Trichloroethene (TCE)	ND	0.50	mg/L		1	9/9/2010 5:44:27 PM
Vinyl chloride	ND	0.20	mg/L		1	9/9/2010 5:44:27 PM
Surr: 1,2-Dichloroethane-d4	73.3	69.9-130	%REC		1	9/9/2010 5:44:27 PM
Surr: 4-Bromofluorobenzene	95.5	71.2-123	%REC		1	9/9/2010 5:44:27 PM
Surr: Dibromofluoromethane	88.4	73.9-134	%REC		1	9/9/2010 5:44:27 PM
Surr: Toluene-d8	96.2	81.9-122	%REC		1	9/9/2010 5:44:27 PM
SM4500-H+B: PH						
pH	8.72	0.100	pH units		1	9/3/2010 10:07:00 PM
SM2540C MOD: TOTAL DISSOLVED SOLIDS						
Total Dissolved Solids	396	20.0	mg/L		1	9/7/2010 12:49:00 PM

Qualifiers:

* Value exceeds Maximum Contaminant Level
 E Estimated value
 J Analyte detected below quantitation limits
 NC Non-Chlorinated
 PQL Practical Quantitation Limit

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 MCL Maximum Contaminant Level
 ND Not Detected at the Reporting Limit
 S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: 23-Sep-10

CLIENT: Waste Isolation Pilot Plant
Lab Order: 1009129
Project: T409304-3
Lab ID: 1009129-03

Client Sample ID: WST-10-097
Collection Date: 8/30/2010 10:02:00 AM
Date Received: 8/31/2010
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8081: PESTICIDES TCLP						Analyst: JDC
Chlordane	ND	0.030		mg/L	1	9/8/2010 4:41:15 PM
Endrin	ND	0.020		mg/L	1	9/8/2010 4:41:15 PM
gamma-BHC (Lindane)	ND	0.40		mg/L	1	9/8/2010 4:41:15 PM
Heptachlor	ND	0.0080		mg/L	1	9/8/2010 4:41:15 PM
Heptachlor epoxide	ND	0.0080		mg/L	1	9/8/2010 4:41:15 PM
Methoxychlor	ND	10		mg/L	1	9/8/2010 4:41:15 PM
Toxaphene	ND	0.50		mg/L	1	9/8/2010 4:41:15 PM
Surr: Decachlorobiphenyl	105	47.3-125		%REC	1	9/8/2010 4:41:15 PM
Surr: Tetrachloro-m-xylene	108	35.7-135		%REC	1	9/8/2010 4:41:15 PM
EPA METHOD 300.0: ANIONS						Analyst: LJB
Chloride	140	10		mg/L	20	9/18/2010 6:49:20 AM
EPA METHOD 7470: MERCURY						Analyst: ELS
Mercury	ND	0.020		mg/L	1	9/20/2010 3:45:51 PM
EPA 6010B: TOTAL RECOVERABLE METALS						Analyst: SNV
Arsenic	ND	5.0		mg/L	1	9/16/2010 1:25:21 PM
Barium	ND	100		mg/L	1	9/16/2010 1:25:21 PM
Cadmium	ND	1.0		mg/L	1	9/16/2010 1:25:21 PM
Chromium	ND	5.0		mg/L	1	9/16/2010 1:25:21 PM
Lead	ND	5.0		mg/L	1	9/16/2010 1:25:21 PM
Selenium	ND	1.0		mg/L	1	9/16/2010 1:25:21 PM
Silver	ND	5.0		mg/L	1	9/16/2010 1:25:21 PM
EPA METHOD 8270C TCLP						Analyst: JDC
2,4-Dinitrotoluene	ND	0.13		mg/L	1	9/8/2010 2:23:51 PM
Hexachlorobenzene	ND	0.13		mg/L	1	9/8/2010 2:23:51 PM
Hexachlorobutadiene	ND	0.50		mg/L	1	9/8/2010 2:23:51 PM
Hexachloroethane	ND	3.0		mg/L	1	9/8/2010 2:23:51 PM
Nitrobenzene	ND	2.0		mg/L	1	9/8/2010 2:23:51 PM
Pentachlorophenol	ND	100		mg/L	1	9/8/2010 2:23:51 PM
Pyridine	ND	5.0		mg/L	1	9/8/2010 2:23:51 PM
2,4,5-Trichlorophenol	ND	400		mg/L	1	9/8/2010 2:23:51 PM
2,4,6-Trichlorophenol	ND	2.0		mg/L	1	9/8/2010 2:23:51 PM
Cresols, Total	ND	200		mg/L	1	9/8/2010 2:23:51 PM
Surr: 2,4,6-Tribromophenol	44.3	20.9-128		%REC	1	9/8/2010 2:23:51 PM
Surr: 2-Fluorobiphenyl	44.4	18.3-119		%REC	1	9/8/2010 2:23:51 PM
Surr: 2-Fluorophenol	29.8	16.6-101		%REC	1	9/8/2010 2:23:51 PM
Surr: 4-Terphenyl-d14	66.9	32.3-135		%REC	1	9/8/2010 2:23:51 PM
Surr: Nitrobenzene-d5	44.8	22.6-117		%REC	1	9/8/2010 2:23:51 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: 23-Sep-10

CLIENT: Waste Isolation Pilot Plant
 Lab Order: 1009129
 Project: T409304-3
 Lab ID: 1009129-03

Client Sample ID: WST-10-097
 Collection Date: 8/30/2010 10:02:00 AM
 Date Received: 8/31/2010
 Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8270C TCLP						Analyst: JDC
Surr: Phenol-d5	25.6	8-77.9	%REC		1	9/8/2010 2:23:51 PM
TCLP VOLATILES BY 8260B						Analyst: MMS
Benzene	ND	0.50		mg/L	1	9/9/2010 6:12:39 PM
2-Butanone	ND	10		mg/L	1	9/9/2010 6:12:39 PM
Carbon Tetrachloride	ND	0.50		mg/L	1	9/9/2010 6:12:39 PM
Chlorobenzene	ND	100		mg/L	1	9/9/2010 6:12:39 PM
Chloroform	ND	6.0		mg/L	1	9/9/2010 6:12:39 PM
1,4-Dichlorobenzene	ND	7.5		mg/L	1	9/9/2010 6:12:39 PM
1,2-Dichloroethane (EDC)	ND	0.50		mg/L	1	9/9/2010 6:12:39 PM
1,1-Dichloroethene	ND	0.70		mg/L	1	9/9/2010 6:12:39 PM
Hexachlorobutadiene	ND	0.50		mg/L	1	9/9/2010 6:12:39 PM
Tetrachloroethene (PCE)	ND	0.70		mg/L	1	9/9/2010 6:12:39 PM
Trichloroethene (TCE)	ND	0.50		mg/L	1	9/9/2010 6:12:39 PM
Vinyl chloride	ND	0.20		mg/L	1	9/9/2010 6:12:39 PM
Surr: 1,2-Dichloroethane-d4	75.1	69.9-130	%REC		1	9/9/2010 6:12:39 PM
Surr: 4-Bromofluorobenzene	93.7	71.2-123	%REC		1	9/9/2010 6:12:39 PM
Surr: Dibromofluoromethane	90.8	73.9-134	%REC		1	9/9/2010 6:12:39 PM
Surr: Toluene-d8	96.9	81.9-122	%REC		1	9/9/2010 6:12:39 PM
SM4500-H+B: PH						Analyst: NSB
pH	8.73	0.100		pH units	1	9/3/2010 10:17:00 PM
SM2540C MOD: TOTAL DISSOLVED SOLIDS						Analyst: SNV
Total Dissolved Solids	396	20.0		mg/L	1	9/7/2010 12:49:00 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: 23-Sep-10

CLIENT: Waste Isolation Pilot Plant
Lab Order: 1009129
Project: T409304-3
Lab ID: 1009129-04

Client Sample ID: WST-10-098
Collection Date: 8/30/2010 10:19:00 AM
Date Received: 8/31/2010
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8081: PESTICIDES TCLP						Analyst: JDC
Chlordane	ND	0.030		mg/L	1	9/8/2010 4:58:29 PM
Endrin	ND	0.020		mg/L	1	9/8/2010 4:58:29 PM
gamma-BHC (Lindane)	ND	0.40		mg/L	1	9/8/2010 4:58:29 PM
Heptachlor	ND	0.0080		mg/L	1	9/8/2010 4:58:29 PM
Heptachlor epoxide	ND	0.0080		mg/L	1	9/8/2010 4:58:29 PM
Methoxychlor	ND	10		mg/L	1	9/8/2010 4:58:29 PM
Toxaphene	ND	0.50		mg/L	1	9/8/2010 4:58:29 PM
Surr: Decachlorobiphenyl	103	47.3-125		%REC	1	9/8/2010 4:58:29 PM
Surr: Tetrachloro-m-xylene	99.6	35.7-135		%REC	1	9/8/2010 4:58:29 PM
EPA METHOD 300.0: ANIONS						Analyst: LJB
Chloride	190	10		mg/L	20	9/3/2010 9:06:11 AM
EPA METHOD 7470: MERCURY						Analyst: ELS
Mercury	ND	0.020		mg/L	1	9/20/2010 3:47:35 PM
EPA 6010B: TOTAL RECOVERABLE METALS						Analyst: SNV
Arsenic	ND	5.0		mg/L	1	9/16/2010 1:31:34 PM
Barium	ND	100		mg/L	1	9/16/2010 1:31:34 PM
Cadmium	ND	1.0		mg/L	1	9/16/2010 1:31:34 PM
Chromium	ND	5.0		mg/L	1	9/16/2010 1:31:34 PM
Lead	ND	5.0		mg/L	1	9/16/2010 1:31:34 PM
Selenium	ND	1.0		mg/L	1	9/16/2010 1:31:34 PM
Silver	ND	5.0		mg/L	1	9/16/2010 1:31:34 PM
EPA METHOD 8270C TCLP						Analyst: JDC
2,4-Dinitrotoluene	ND	0.13		mg/L	1	9/8/2010 2:54:21 PM
Hexachlorobenzene	ND	0.13		mg/L	1	9/8/2010 2:54:21 PM
Hexachlorobutadiene	ND	0.50		mg/L	1	9/8/2010 2:54:21 PM
Hexachloroethane	ND	3.0		mg/L	1	9/8/2010 2:54:21 PM
Nitrobenzene	ND	2.0		mg/L	1	9/8/2010 2:54:21 PM
Pentachlorophenol	ND	100		mg/L	1	9/8/2010 2:54:21 PM
Pyridine	ND	5.0		mg/L	1	9/8/2010 2:54:21 PM
2,4,5-Trichlorophenol	ND	400		mg/L	1	9/8/2010 2:54:21 PM
2,4,6-Trichlorophenol	ND	2.0		mg/L	1	9/8/2010 2:54:21 PM
Cresols, Total	ND	200		mg/L	1	9/8/2010 2:54:21 PM
Surr: 2,4,6-Tribromophenol	46.3	20.9-128		%REC	1	9/8/2010 2:54:21 PM
Surr: 2-Fluorobiphenyl	75.3	18.3-119		%REC	1	9/8/2010 2:54:21 PM
Surr: 2-Fluorophenol	33.7	16.6-101		%REC	1	9/8/2010 2:54:21 PM
Surr: 4-Terphenyl-d14	78.5	32.3-135		%REC	1	9/8/2010 2:54:21 PM
Surr: Nitrobenzene-d5	79.5	22.6-117		%REC	1	9/8/2010 2:54:21 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: 23-Sep-10

CLIENT: Waste Isolation Pilot Plant Client Sample ID: WST-10-098
 Lab Order: 1009129 Collection Date: 8/30/2010 10:19:00 AM
 Project: T409304-3 Date Received: 8/31/2010
 Lab ID: 1009129-04 Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8270C TCLP Analyst: JDC						
Surr: Phenol-d5	36.8	8-77.9		%REC	1	9/8/2010 2:54:21 PM
TCLP VOLATILES BY 8260B Analyst: MMS						
Benzene	ND	0.50		mg/L	1	9/9/2010 6:40:56 PM
2-Butanone	ND	10		mg/L	1	9/9/2010 6:40:56 PM
Carbon Tetrachloride	ND	0.50		mg/L	1	9/9/2010 6:40:56 PM
Chlorobenzene	ND	100		mg/L	1	9/9/2010 6:40:56 PM
Chloroform	ND	6.0		mg/L	1	9/9/2010 6:40:56 PM
1,4-Dichlorobenzene	ND	7.5		mg/L	1	9/9/2010 6:40:56 PM
1,2-Dichloroethane (EDC)	ND	0.50		mg/L	1	9/9/2010 6:40:56 PM
1,1-Dichloroethene	ND	0.70		mg/L	1	9/9/2010 6:40:56 PM
Hexachlorobutadiene	ND	0.50		mg/L	1	9/9/2010 6:40:56 PM
Tetrachloroethene (PCE)	ND	0.70		mg/L	1	9/9/2010 6:40:56 PM
Trichloroethene (TCE)	ND	0.50		mg/L	1	9/9/2010 6:40:56 PM
Vinyl chloride	ND	0.20		mg/L	1	9/9/2010 6:40:56 PM
Surr: 1,2-Dichloroethane-d4	78.4	69.9-130		%REC	1	9/9/2010 6:40:56 PM
Surr: 4-Bromofluorobenzene	98.4	71.2-123		%REC	1	9/9/2010 6:40:56 PM
Surr: Dibromofluoromethane	91.2	73.9-134		%REC	1	9/9/2010 6:40:56 PM
Surr: Toluene-d8	99.4	81.9-122		%REC	1	9/9/2010 6:40:56 PM
SM4500-H+B: PH Analyst: NSB						
pH	9.25	0.100		pH units	1	9/3/2010 10:26:00 PM
SM2540C MOD: TOTAL DISSOLVED SOLIDS Analyst: SNV						
Total Dissolved Solids	363	20.0		mg/L	1	9/7/2010 12:49:00 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- NC Non-Chlorinated
- FQL Practical Quantitation Limit
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: 23-Sep-10

CLIENT: Waste Isolation Pilot Plant
Lab Order: 1009129
Project: T409304-3
Lab ID: 1009129-05

Client Sample ID: WST-10-099
Collection Date: 8/30/2010 10:27:00 AM
Date Received: 8/31/2010
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8081: PESTICIDES TCLP						Analyst: JDC
Chlordane	ND	0.030		mg/L	1	9/8/2010 5:15:41 PM
Endrin	ND	0.020		mg/L	1	9/8/2010 5:15:41 PM
gamma-BHC (Lindane)	ND	0.40		mg/L	1	9/8/2010 5:15:41 PM
Heptachlor	ND	0.0080		mg/L	1	9/8/2010 5:15:41 PM
Heptachlor epoxide	ND	0.0080		mg/L	1	9/8/2010 5:15:41 PM
Methoxychlor	ND	10		mg/L	1	9/8/2010 5:15:41 PM
Toxaphene	ND	0.50		mg/L	1	9/8/2010 5:15:41 PM
Surr: Decachlorobiphenyl	99.8	47.3-125		%REC	1	9/8/2010 5:15:41 PM
Surr: Tetrachloro-m-xylene	99.4	35.7-135		%REC	1	9/8/2010 5:15:41 PM
EPA METHOD 300.0: ANIONS						Analyst: LJB
Chloride	ND	0.50		mg/L	1	9/3/2010 5:54:40 AM
EPA METHOD 7470: MERCURY						Analyst: ELS
Mercury	ND	0.020		mg/L	1	9/20/2010 3:49:19 PM
EPA 6010B: TOTAL RECOVERABLE METALS						Analyst: SNV
Arsenic	ND	5.0		mg/L	1	9/16/2010 2:00:59 PM
Barium	ND	100		mg/L	1	9/16/2010 2:00:59 PM
Cadmium	ND	1.0		mg/L	1	9/16/2010 2:00:59 PM
Chromium	ND	5.0		mg/L	1	9/16/2010 2:00:59 PM
Lead	ND	5.0		mg/L	1	9/16/2010 2:00:59 PM
Selenium	ND	1.0		mg/L	1	9/16/2010 2:00:59 PM
Silver	ND	5.0		mg/L	1	9/16/2010 2:00:59 PM
EPA METHOD 8270C TCLP						Analyst: JDC
2,4-Dinitrotoluene	ND	0.13		mg/L	1	9/8/2010 3:24:37 PM
Hexachlorobenzene	ND	0.13		mg/L	1	9/8/2010 3:24:37 PM
Hexachlorobutadiene	ND	0.50		mg/L	1	9/8/2010 3:24:37 PM
Hexachloroethane	ND	3.0		mg/L	1	9/8/2010 3:24:37 PM
Nitrobenzene	ND	2.0		mg/L	1	9/8/2010 3:24:37 PM
Pentachlorophenol	ND	100		mg/L	1	9/8/2010 3:24:37 PM
Pyridine	ND	5.0		mg/L	1	9/8/2010 3:24:37 PM
2,4,5-Trichlorophenol	ND	400		mg/L	1	9/8/2010 3:24:37 PM
2,4,6-Trichlorophenol	ND	2.0		mg/L	1	9/8/2010 3:24:37 PM
Cresols, Total	ND	200		mg/L	1	9/8/2010 3:24:37 PM
Surr: 2,4,6-Tribromophenol	79.8	20.9-128		%REC	1	9/8/2010 3:24:37 PM
Surr: 2-Fluorobiphenyl	78.5	18.3-119		%REC	1	9/8/2010 3:24:37 PM
Surr: 2-Fluorophenol	53.5	16.6-101		%REC	1	9/8/2010 3:24:37 PM
Surr: 4-Terphenyl-d14	68.6	32.3-135		%REC	1	9/8/2010 3:24:37 PM
Surr: Nitrobenzene-d5	75.9	22.6-117		%REC	1	9/8/2010 3:24:37 PM

Qualifiers:

* Value exceeds Maximum Contaminant Level
 E Estimated value
 J Analyte detected below quantitation limits
 NC Non-Chlorinated
 PQL Practical Quantitation Limit

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 MCL Maximum Contaminant Level
 ND Not Detected at the Reporting Limit
 S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: 23-Sep-10

CLIENT: Waste Isolation Pilot Plant
Lab Order: 1009129
Project: T409304-3
Lab ID: 1009129-05

Client Sample ID: WST-10-099
Collection Date: 8/30/2010 10:27:00 AM
Date Received: 8/31/2010
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8270C TCLP						Analyst: JDC
Surr: Phenol-d5	42.3	8-77.9		%REC	1	9/8/2010 3:24:37 PM
TCLP VOLATILES BY 8260B						Analyst: MMS
Benzene	ND	0.50		mg/L	1	9/9/2010 7:09:06 PM
2-Butanone	ND	10		mg/L	1	9/9/2010 7:09:06 PM
Carbon Tetrachloride	ND	0.50		mg/L	1	9/9/2010 7:09:06 PM
Chlorobenzene	ND	100		mg/L	1	9/9/2010 7:09:06 PM
Chloroform	ND	6.0		mg/L	1	9/9/2010 7:09:06 PM
1,4-Dichlorobenzene	ND	7.5		mg/L	1	9/9/2010 7:09:06 PM
1,2-Dichloroethane (EDC)	ND	0.50		mg/L	1	9/9/2010 7:09:06 PM
1,1-Dichloroethene	ND	0.70		mg/L	1	9/9/2010 7:09:06 PM
Hexachlorobutadiene	ND	0.50		mg/L	1	9/9/2010 7:09:06 PM
Tetrachloroethene (PCE)	ND	0.70		mg/L	1	9/9/2010 7:09:06 PM
Trichloroethene (TCE)	ND	0.50		mg/L	1	9/9/2010 7:09:06 PM
Vinyl chloride	ND	0.20		mg/L	1	9/9/2010 7:09:06 PM
Surr: 1,2-Dichloroethane-d4	74.4	69.9-130		%REC	1	9/9/2010 7:09:06 PM
Surr: 4-Bromofluorobenzene	101	71.2-123		%REC	1	9/9/2010 7:09:06 PM
Surr: Dibromofluoromethane	91.0	73.9-134		%REC	1	9/9/2010 7:09:06 PM
Surr: Toluene-d8	99.6	81.9-122		%REC	1	9/9/2010 7:09:06 PM
SM4500-H+B: PH						Analyst: NSB
pH	6.29	0.100		pH units	1	9/3/2010 10:35:00 PM
SM2540C MOD: TOTAL DISSOLVED SOLIDS						Analyst: SNV
Total Dissolved Solids	ND	20.0		mg/L	1	9/7/2010 12:49:00 PM

Qualifiers:

* Value exceeds Maximum Contaminant Level
 E Estimated value
 J Analyte detected below quantitation limits
 NC Non-Chlorinated
 PQL Practical Quantitation Limit

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 MCL Maximum Contaminant Level
 ND Not Detected at the Reporting Limit
 S Spike recovery outside accepted recovery limits

Anatek Labs, Inc.

1282 Alturas Drive • Moscow, ID 83843 • (208) 883-2839 • Fax (208) 882-9246 • email moscow@anateklabs.com
504 E Sprague Ste. D • Spokane WA 99202 • (509) 838-3999 • Fax (509) 838-4433 • email spokane@anateklabs.com

Client: HALL ENVIRONMENTAL ANALYSIS LAB **Batch #:** 100903025
Address: 4901 HAWKINS NE SUITE D **Project Name:** 1009129
ALBUQUERQUE, NM 87109
Attn: ANDY FREEMAN

Analytical Results Report

Sample Number	100903025-001	Sampling Date	8/30/2010	Date/Time Received	9/3/2010	11:20 AM
Client Sample ID	1009129-01D / WST-10-095	Sampling Time	9:35 AM	Extraction Date	9/3/2010	
Matrix	Water	Sample Location				
Comments						

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
TCLP 2,4,5-TP (Silvex)	ND	ppm	0.1	9/7/2010	SAT	EPA 8151A	
TCLP 2,4-D	ND	ppm	0.1	9/7/2010	SAT	EPA 8151A	

Anatek Labs, Inc.

1282 Alturas Drive • Moscow, ID 83843 • (208) 883-2839 • Fax (208) 882-9246 • email moscow@anateklabs.com
504 E Sprague Ste. D • Spokane WA 99202 • (509) 838-3999 • Fax (509) 838-4433 • email spokane@anateklabs.com

Client: HALL ENVIRONMENTAL ANALYSIS LAB
Address: 4901 HAWKINS NE SUITE D
ALBUQUERQUE, NM 87109
Attn: ANDY FREEMAN

Batch #: 100903025
Project Name: 1009129

Analytical Results Report

Sample Number	100903025-002	Sampling Date	8/30/2010	Date/Time Received	9/3/2010	11:20 AM
Client Sample ID	1009129-02D / WST-10-096	Sampling Time	9:54 AM	Extraction Date	9/3/2010	
Matrix	Water	Sample Location				
Comments						

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
TCLP 2,4,5-TP (Silvex)	ND	ppm	0.1	9/7/2010	SAT	EPA 8151A	
TCLP 2,4-D	ND	ppm	0.1	9/7/2010	SAT	EPA 8151A	

Anatek Labs, Inc.

1282 Alturas Drive • Moscow, ID 83843 • (208) 883-2839 • Fax (208) 882-9246 • email moscow@anateklabs.com
504 E Sprague Ste. D • Spokane WA 99202 • (509) 838-3999 • Fax (509) 838-4433 • email spokane@anateklabs.com

Client: HALL ENVIRONMENTAL ANALYSIS LAB
Address: 4901 HAWKINS NE SUITE D
ALBUQUERQUE, NM 87109
Attn: ANDY FREEMAN

Batch #: 100903025
Project Name: 1009129

Analytical Results Report

Sample Number	100903025-003	Sampling Date	8/30/2010	Date/Time Received	9/3/2010 11:20 AM
Client Sample ID	1009129-03D / WST-10-097	Sampling Time	10:02 AM	Extraction Date	9/3/2010
Matrix	Water	Sample Location			
Comments					

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
TCLP 2,4,5-TP (Silvex)	ND	ppm	0.1	9/7/2010	SAT	EPA 8151A	
TCLP 2,4-D	ND	ppm	0.1	9/7/2010	SAT	EPA 8151A	

Anatek Labs, Inc.

1282 Alturas Drive • Moscow, ID 83843 • (208) 883-2839 • Fax (208) 882-9246 • email moscow@anateklabs.com
504 E Sprague Ste. D • Spokane WA 99202 • (509) 838-3999 • Fax (509) 838-4433 • email spokane@anateklabs.com

Client: HALL ENVIRONMENTAL ANALYSIS LAB **Batch #:** 100903025
Address: 4901 HAWKINS NE SUITE D **Project Name:** 1009129
ALBUQUERQUE, NM 87109
Attn: ANDY FREEMAN

Analytical Results Report

Sample Number	100903025-004	Sampling Date	8/30/2010	Date/Time Received	9/3/2010 11:20 AM
Client Sample ID	1009129-04D / WST-10-098	Sampling Time	10:19 AM	Extraction Date	9/3/2010
Matrix	Water	Sample Location			
Comments					

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
TCLP 2,4,5-TP (Silvex)	ND	ppm	0.1	9/7/2010	SAT	EPA 8151A	
TCLP 2,4-D	ND	ppm	0.1	9/7/2010	SAT	EPA 8151A	

Anatek Labs, Inc.

1282 Alturas Drive • Moscow, ID 83843 • (208) 883-2839 • Fax (208) 882-9246 • email moscow@anateklabs.com
504 E Sprague Ste. D • Spokane WA 99202 • (509) 838-3999 • Fax (509) 838-4433 • email spokane@anateklabs.com

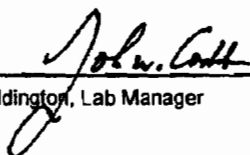
Client: HALL ENVIRONMENTAL ANALYSIS LAB **Batch #:** 100903025
Address: 4901 HAWKINS NE SUITE D **Project Name:** 1009129
ALBUQUERQUE, NM 87109
Attn: ANDY FREEMAN

Analytical Results Report

Sample Number	100903025-005	Sampling Date	8/30/2010	Date/Time Received	9/3/2010 11:20 AM
Client Sample ID	1009129-05D / WST-10-099	Sampling Time	10:27 AM	Extraction Date	9/3/2010
Matrix	Water	Sample Location			
Comments					

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
TCLP 2,4,5-TP (Silvex)	ND	ppm	0.1	9/7/2010	SAT	EPA 8151A	
TCLP 2,4-D	ND	ppm	0.1	9/7/2010	SAT	EPA 8151A	

Authorized Signature


John Coddington, Lab Manager

MCL EPA's Maximum Contaminant Level
ND Not Detected
PQL Practical Quantitation Limit

This report shall not be reproduced except in full, without the written approval of the laboratory.
The results reported relate only to the samples indicated.
Soil/solid results are reported on a dry-weight basis unless otherwise noted.

Certifications held by Anatek Labs ID: EPA:ID00013; AZ:0701; CO:ID00013; FL(NELAP):E87893; ID:ID00013; IN:C-ID-01; KY:90142; MT:CERT0028; NM:ID00013; OR:ID200001-002; WA:C595
Certifications held by Anatek Labs WA: EPA:WA00168; CA:Cert2632; ID:WA00168; WA:C585; MT:Cert0095