



# Florida Department of Environmental Protection

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Mr. Gerald Laurencio  
Friends Recycling, LLC  
2350 N. W. 27th Avenue  
Ocala, FL 34475

OCD-SW-09-0030

Marion County – SW  
Friends Recycling, LLC – C&D Disposal & Recycling  
Fifteenth Semi-Annual Groundwater Monitoring Event

Dear Mr. Laurencio:

Hydrologic Associates U.S.A., Inc. (HAI) submitted the following document on your behalf: "The Fifteenth Semi-annual Report for Friends Recycling C and D Facility." The cover letter was dated September 24, 2008 and signed and sealed on September 30, 2008. The Department received the submittal on October 6, 2008. The submittal included revised Well Completion Forms and the surveyed locations of the monitoring wells shown on a site plan.

The report dated September 28, 2008 is not acceptable. The Department's detail review comments are in Attachment 1. Please respond in writing to our comments within 45 days.

The cover letter for the Semi-annual Report notes, "...the sample from monitor well MW-9S was devoid of volatile detections. It is HAI's understanding that at the time of installation...that should this be the case, then the well would be removed from the permanent network." The report appears to consider that this condition has been met and requests verification before the February 2009 sampling event.

1. The Department's understanding is that the well under consideration is MW-9D rather than MW-9S.
2. The Department does not accept the conclusion that either MW-9S or MW-9D was devoid of volatile detections for the following reasons:
  - a. The August 2008 sampling included only the routine semi-annual sampling parameters. The initial sample for all new wells should have included the parameters listed in MPIS Attachment C. This is an expanded list of parameters required for initial sampling of monitoring wells. It is specifically required by MPIS Condition #6.
  - b. The Department cannot consider the samples results obtained as valid. The Dissolved Oxygen levels need to be less than or equal 20% for the volatile results to be acceptable. Dissolved Oxygen levels for MW-9S and MW-9D were both over 100%.

Mr. Gerald Laurengo  
OCD-SW-09-0030  
Page #2

Based on the Department's review of the above document, the Department requires that the February 2009 sampling include the Initial Sample Parameters (Attachment C of the permit MPIS) for all wells, except MW-1. The regular semi-annual parameters are acceptable for MW-1 because it is not a new well. Dissolved Oxygen levels must be  $\leq 20\%$  for the volatile organic samples to be considered valid. If you cannot obtain an acceptable DO level, make sure you follow the requirements of DEP-SOP-001/01 FS 2200 Groundwater Sampling Section 3.5 (and possibly 3.6).

Please complete the Feb 2009 sampling event within 45 days. The Department must be notified at least 14 days prior to the scheduled sampling date.

Please contact me by e-mail at [marjorie.heidorn@dep.state.fl.us](mailto:marjorie.heidorn@dep.state.fl.us) or phone at (407) 893-3320 with questions about this letter or if you wish to meet to discuss ideas for the groundwater sampling event.

Sincerely,



F. Thomas Lubozynski, P.E.  
Waste Program Administrator

Date: February 11, 2009

FTL/mh

Enclosure:

1. Review Comments on the Semi-annual Report, dated September 24, 2008. (Attachment 1)
2. Initial Sample Parameters (Attachment C of the permit MPIS)
3. Aerial 1 –Land Surrounding Friends Recycling

cc: Juan C. Guerra, P.E., Guerra Development Corp. [guerracorp@att.net](mailto:guerracorp@att.net)  
James T. Miller, P.E., Hydrologic Associates U.S.A., Inc. [JMiller@HAIMiami.com](mailto:JMiller@HAIMiami.com)  
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## Attachment 1: Review Comments on the Semi-annual Report, dated September 24, 2008.

### General Sampling

1. The August 2008 sampling included the routine semi-annual sampling parameters for all monitoring wells. For the new wells (MW-5 is considered a new well since it was not used previously), the sampling should have included the parameters listed in MPIS Attachment C. This is an expanded list of parameters required for initial sampling of monitoring wells. It is specifically required by MPIS Condition #6. The February 2009 sampling shall be done for the Initial Sample Parameters (Attachment C of the permit MPIS) for the 5 new MPIS wells plus MW-9D. (MW-1 can be sampled for the standard semi-annual list of parameters.)

### Clerical

2. The first paragraph under "Introduction" stated that all four wells are considered compliance wells." Please note for future reports that there are a total of 6 wells in the current MPIS. Four are detection wells and two are compliance wells.
3. The lab reported Phenols in MW-8 as 0.022 mg/L. The Exceedance Table listed the value as 0.22 mg/L. Please verify that this is a clerical error.

### Field Parameters

4. The submitted field parameter table indicates that the measured dissolved oxygen and calculated % in ground water samples collected from monitoring wells were:

| Dissolved Oxygen                     | MW-1  | MW-5  | MW-6  | MW-7  | MW-8  | MW-9S | MW-9D |
|--------------------------------------|-------|-------|-------|-------|-------|-------|-------|
| C°                                   | 26.65 | 24.02 | 23.92 | 25.51 | 23.41 | 23.56 | 23.55 |
| mg/L reported                        | 2.4   | 1.0   | 2.6   | 1.6   | 1.2   | 8.6   | 19.6  |
| % reported                           | 0.64% | 0.08% | 0.21% | 0.13% | 0.10% | 0.73% | 1.66% |
| % DEP Calculated from DO mg/L and C° | 29.9% | 12.5% | 30.8% | 19.5% | 14.1% | 101%  | 231%  |

|   |
|---|
| Legend  |
| Unreasonably high DO mg/L in natural ground water   |
| Result not fit the reported mg/L and C°             |
| Calculated results too high to assure valid results |

- a. Dissolved Oxygen levels need to be less than or equal to 20% for the volatile results to be acceptable. Dissolved Oxygen for MW-9S and MW-9D were both over 100%. DEP does not accept the sampling of the volatile organics for MW-9S and MW-9D to be valid.
- b. The values reported (mg/L and percent saturation) do not correlate. Please explain (show calculations) how one was converted to the other.
- c. Were some results reported incorrectly because based on the reported mg/L levels the saturation point is exceeded?
- d. When completing the Groundwater Sampling Log (Form FD 9000-24) the results should be reported in the units indicated on the measuring instrument. For Dissolved Oxygen, circle the appropriate unit of measure and then record the number on the instrument.
- e. These DO values are an indication that the water column in the well and/or the sample had been agitated and may not represent in situ water quality, that the dissolved oxygen meter was not operating properly, or that there is some other explanation for the high dissolved oxygen which you have not provided.

It is suggested that purge tubing be completely submerged within the measurement container so that purge water will not drip or cascade down the side of the container. Additionally, the dissolved oxygen meter should be placed in the container such that a

constant flow of purge water is flowing over the probe in order to assure a more accurate reading.

While a faster rate of pumping may produce acceptable results, if dissolved oxygen in the sample is high, the affected wells should be purged by pumping at low flow rates of 0.1 to 1 liters per minute. If during purging and sampling dissolved oxygen in a sample exceeds 20 percent of saturation, aeration of the sample may have occurred unless it can be **demonstrated** that in situ ground water contains the levels of dissolved oxygen measured in the ground water samples. The wells with high dissolved oxygen concentrations should be repurged and resampled when dissolved oxygen values are acceptable. Care should be taken during every sampling event to ensure that neither the water column in the wells nor the samples are agitated prior to or while filling sample containers.

- f. If the DO level is still too high make sure you follow the requirements of DEP-SOP-001/01 FS 2200 Groundwater Sampling Section 3.5 (and possibly 3.6).

5. Turbidity in ground water samples collected from monitoring wells were:

| Turbidity | MW-1 | MW-5 | MW-6 | MW-7 | MW-8 | MW-9S | MW-9D |
|-----------|------|------|------|------|------|-------|-------|
| NTUs      | 310  | 296  | 14.2 | 31.7 | 4.09 | 24.7  | 21.8  |

| Legend   |
|--|
| Calculated results too high to assure valid results. Well may need to be redeveloped |
| Lesser concern but should have been discussed in the report.                         |

Turbidity for a properly designed, constructed, developed, and sampled well should not exceed 20 Nephelometric Turbidity Units (NTUs). If turbidity exceeds 20 NTU's, repurging and resampling should be conducted. While a faster rate of pumping may produce acceptable results, if turbidity in the sample is high, the affected wells should be purged by pumping at low flow rates of 0.1 to 1 liters per minute.

During future ground water sampling events, please exercise care to ensure that neither the water column in the well nor the sample are agitated prior to or while filling sample containers. If turbidity values during purging and sampling remain high, the affected wells may need to be abandoned and a ground water monitoring well, designed for site specific conditions, installed.

If the turbidity level is still too high make sure you follow the requirements of DEP-SOP-001/01 FS 2200 Groundwater Sampling Section 3.5 (and possibly 3.6).

In the future, if any turbidity results are greater than 20 NTUs the report shall discuss the suspected reason for the elevated level, what has been done to correct the turbidity, and how the results may be affected by the elevated turbidity.

## Lab Reports

6. MW-8 is a compliance well not a detection well as listed in Validator. Please use the "DE" well type in future submittals.
7. All Field Parameters, including ground water elevations, must be included in all future submittals of the Validator data.
8. The reported detection limit for Antimony was 13 ug/L, but Antimony has a primary standard of 6 ug/L and a PQL of 5 ug/L. As noted in Condition #9 of the MPIS, please confer with your consultant and analytical laboratory prior to sampling to ensure the analytical method is capable of achieving detection limits at or below the Ground Water Cleanup Target Levels (GCTLs) in Chapter 62-777, F.A.C. GCTLs are used as screening tools and interim guidelines for ground water minimum criteria until standards are promulgated.

## Maps

9. Condition #18 of the MPIS requires that following installation of the monitoring wells:

One (1) paper copy and one (1) electronic copy of a drawing must be submitted within thirty (30) days following monitoring well installation showing the location of all monitoring wells (active and abandoned), water bodies and waste filled areas. The location of features on the drawing must be horizontally and vertically located by standard surveying techniques. The drawing shall include all monitoring well locations, each monitoring well name and identification (WACS) number, the top of casing, pad elevation, permanent benchmark(s) and/or corner monument marker(s) referenced to NGVD with an accuracy of 0.01 feet. The latitude and longitude of each well in degrees, minutes and seconds, to two (2) decimal places, with an accuracy of 15 feet, must be determined and provided on the drawing. The survey shall be conducted and certified by a Florida Licensed Surveyor and Mapper. [62-701.730(4)(b), 62-701.510(3)(d)1, F.A.C.]

Although the report does not name Figure 2, it implies that the Department is to use it as the official Site Plan, meeting the requirement of Condition #18. However:

- a. There is no information on how the elevations were obtained. (A hand held GPS would not give the accuracy required.)
- b. There is no assurance that the survey was conducted and certified by a Florida Licensed Surveyor and Mapper. It is not signed and sealed.
- c. Two copies of Figure 3 "Ground Water Flow Plan" were provided. Both were signed and sealed. If one of these seals was intended for the Figure 2, it would not be acceptable because it was signed and sealed by a Professional Engineer. MPIS Condition #18 requires a site plan be signed and sealed by a Florida Licensed Surveyor and Mapper.

Figure 2 is not acceptable; it does not meet the requirement of Condition # 18 of the permit MPIS. Please provide the map as specified in Condition #18.

10. There are no contours on the "Ground Water Flow Plan" (Figure 3). An arrow indicating groundwater flow direction in one location is not a contour map. Also, not all of the flow would be toward the east as indicated by the arrow. (The ground water values posted indicate that flow should be from MW-1 to the northwest toward the MW-9 cluster.).

Figure 3 does not satisfy the requirements of a ground water contour map. Please provide a contoured ground water map as required by Condition #22 of the MPIS.

11. The pages titled "Introduction" and "Results" both note that the ground water flow direction is variable due to pumping at nearby groves. This statement has never been supported with data.

If the groves are ever to be referred to again, the statement must at the minimum be accompanied with a copy of the attached aerial (Aerial 1) with all of the suspected groves clearly outlined and labeled with the name of each grove and location of the irrigation wells.

### Exceedances

12. The page titled "Results" states, "The exceedance table shows parameters which exceeded groundwater standards during this sampling and analysis event. Some parameters are considered naturally occurring, especially when no other indicator parameters are above criteria." This is too general of a statement to be of value. In the future, specify which parameters should be considered natural. Also, give a reason for that conclusion. How do you know such parameters are in the natural environment at a concentration that would result in the concentration measured? Also, if naturally occurring why are the measured concentrations so varied among the wells?
13. The Exceedance Table omitted MW-1 Arsenic 0.011 mg/L and MW-5 TDS 586 mg/L. In the future, all exceedances shall be included in the Exceedance Table.
14. Modified Exceedance Table with DEP comments:

| Monitoring Site    | Parameter                | Result | Qualifier | Units | Standard | DEP Comment  |
|--------------------|--------------------------|--------|-----------|-------|----------|--|
| Primary Standard   |                          |        |           |       |          |  |
| MW-1               | Arsenic                  | 11     |           | ug/L  | 10       | High Turbidity (360 NTUs) need to see results with low turbidity. The well has had <20 NTUs in the past. |
| MW-8               | Benzene                  | 1.3    |           | ug/L  | 1        | Could be an issue. First Sample from this well. Will watch.  |
| MW-7               | Nitrogen, Nitrate (as N) | 14     |           | mg/L  | 10       | Could be an issue. First Sample from this well. Will watch.  |
| Secondary Standard |                          |        |           |       |          |  |
| MW-1               | Aluminum                 | 360    | V         | ug/L  | 200      |  |
| MW-7               | Aluminum                 | 220    | V         | ug/L  | 200      |  |
| MW-9D              | Aluminum                 | 400    | V         | ug/L  | 200      |  |
| MW-1               | Iron                     | 3600   |           | ug/L  | 300      |  |
| MW-5               | Iron                     | 11,000 |           | ug/L  | 300      |  |
| MW-7               | Iron                     | 350    |           | ug/L  | 300      |  |
| MW-8               | Iron                     | 1,100  |           | ug/L  | 300      |  |
| MW-1               | Solids, Total Dissolved  | 1560   |           | mg/L  | 500      |  |
| MW-5               | Solids, Total Dissolved  | 586    |           | mg/L  | 500      |  |
| MW-6               | Solids, Total Dissolved  | 598    |           | mg/L  | 500      |  |
| MW-7               | Solids, Total Dissolved  | 676    |           | mg/L  | 500      |  |
| MW-8               | Solids, Total Dissolved  | 648    |           | mg/L  | 500      |  |
| MW-1               | Sulfate                  | 670    |           | mg/L  | 250      |  |
| GTCL               |                          |        |           |       |          |  |
| MW-1               | Phenols, Total           | 32.6   |           | ug/L  | 10       |  |
| MW-5               | Phenols, Total           | 24.6   |           | ug/L  | 10       |  |
| MW-6               | Phenols, Total           | 17.9   |           | ug/L  | 10       |  |
| MW-7               | Phenols, Total           | 16     |           | ug/L  | 10       |  |
| MW-8               | Phenols, Total           | 22     |           | ug/L  | 10       |  |
| MW-9D              | Phenols, Total           | 13.3   |           | ug/L  | 10       |  |
| MW-9S              | Phenols, Total           | 16.6   |           | ug/L  | 10       |  |

15. The Department is not requesting Contamination Evaluation (Rule 62-701.510(7)(a), F.A.C.) of exceedances at this time, because the Department does not have reasonable assurance that the above list of exceedances is representative of the ground water quality for the following reasons:
- a. Sampling was incomplete. The new wells were not sampled for all of the initial sampling parameters.
  - b. Need more sampling events to verify a trend.
  - c. The turbidity may have interfered with some parameters. (In particular Arsenic in MW-1 may be a turbidity problem rather than a true exceedance.)
  - d. The dissolved oxygen levels in important wells (MW-1, MW-9S, and MW-9D) were unacceptable. (In the future if the dissolved oxygen is out of range, the Department may require complete resampling of the volatiles for the wells with excessive DO.)

#### **Next Step**

16. As stated in the cover letter, please complete the Feb 2009 semi-annual/initial sampling event and respond to this letter within 45 days. If you are willing we would appreciate the data being submitted electronically using ADaPT, rather than Validator. This is the new QA/QC software the Solid Waste Program is beginning to use. Please contact Ms. Laxsamee Levin at [Laxsamee.levin@dep.state.fl.us](mailto:Laxsamee.levin@dep.state.fl.us) or 407-893-3311 for more information about ADaPT.

# ATTACHMENT C

## FRIENDS RECYCLING LLC-C & D DISPOSAL AND RECYCLING

### PARAMETER MONITORING REPORT

Rules 62-701.510(8)(a)&(d) & 62-701.730(4)(b)5, F.A.C.

WACS Report Type: INICD

Initial Ground Water Monitoring (Page 1 of 10)

WACS\_FACILITY 21012

SAMPLING DATE/TIME \_\_\_\_\_

WACS\_WELL \_\_\_\_\_

SAMPLING METHOD \_\_\_\_\_

MONITORING\_SITE\_NUM \_\_\_\_\_

WELL TYPE: (CO) Compliance (DE) Detection

Well Purged prior to  
Sample Collection? (Y/N) \_\_\_\_\_

Ground water classification: G-II

| STORET CODE | PARAMETER MONITORED       | ANALYSIS DATE | FIELD FILTERED (/N) | PRESERV. INTACT (Y/n) | ANALYSIS METHOD | ANALYSIS RESULT | DETECTION LIMIT | UNITS    | QUALIFIER |
|-------------|---------------------------|---------------|---------------------|-----------------------|-----------------|-----------------|-----------------|----------|-----------|
| 082545      | Water Elevation (NGVD)    |               |                     |                       |                 |                 |                 | Ft       |           |
| 000010      | Temperature (field)       |               |                     |                       |                 |                 |                 | deg C    |           |
| 000299      | Dissolved Oxygen (field)  |               |                     |                       |                 |                 |                 | Mg/L     |           |
| 000406      | pH (field)                |               |                     |                       |                 |                 |                 | STD      |           |
| 000094      | Spec. Conductance (field) |               |                     |                       |                 |                 |                 | Umhos/cm |           |
| 082078      | Turbidity (field)         |               |                     |                       |                 |                 |                 | NTU      |           |
| 000610      | Total Ammonia as N        |               |                     |                       |                 |                 |                 | Mg/L     |           |
| 000940      | Chlorides                 |               |                     |                       |                 |                 |                 | Mg/L     |           |
| 000620      | Nitrate as N              |               |                     |                       |                 |                 |                 | Mg/L     |           |
| 000945      | Sulfate                   |               |                     |                       |                 |                 |                 | Mg/L     |           |
| 070300      | Total Dissolved Solids    |               |                     |                       |                 |                 |                 | Mg/L     |           |
| 032730      | Phenols                   |               |                     |                       |                 |                 |                 |          |           |
|             | <b><u>METALS</u></b>      |               |                     |                       |                 |                 |                 |          |           |
| 001105      | Aluminum                  |               |                     |                       |                 |                 |                 | Ug/L     |           |
| 001097      | Antimony                  |               |                     |                       |                 |                 |                 | Ug/L     |           |
| 001002      | Arsenic                   |               |                     |                       |                 |                 |                 | Ug/L     |           |
| 001007      | Barium                    |               |                     |                       |                 |                 |                 | Ug/L     |           |
| 001012      | Beryllium                 |               |                     |                       |                 |                 |                 | Ug/L     |           |
| 001027      | Cadmium                   |               |                     |                       |                 |                 |                 | Ug/L     |           |
| 001034      | Chromium                  |               |                     |                       |                 |                 |                 | Ug/L     |           |
| 001037      | Cobalt                    |               |                     |                       |                 |                 |                 | Ug/L     |           |
| 001042      | Copper                    |               |                     |                       |                 |                 |                 | Ug/L     |           |
| 001045      | Iron                      |               |                     |                       |                 |                 |                 | Ug/L     |           |
| 001051      | Lead                      |               |                     |                       |                 |                 |                 | Ug/L     |           |
| 071900      | Mercury                   |               |                     |                       |                 |                 |                 | Ug/L     |           |



# ATTACHMENT C

## FRIENDS RECYCLING LLC-C & D DISPOSAL AND RECYCLING

### PARAMETER MONITORING REPORT

Rules 62-701.510(8)(a)&(d) & 62-701.730(4)(b)5, F.A.C.

WACS Report Type: INICD

Initial Ground Water Monitoring (Page 2 of 10)

WACS\_FACILITY 21012

SAMPLING DATE/TIME \_\_\_\_\_

WACS\_WELL \_\_\_\_\_

SAMPLING METHOD \_\_\_\_\_

MONITORING\_SITE\_NUM \_\_\_\_\_

WELL TYPE: (CO) Compliance (DE) Detection

Well Purged prior to  
Sample Collection? (Y/N) \_\_\_\_\_

Ground water classification: G-II

| STORET CODE | PARAMETER MONITORED          | ANALYSIS DATE | FIELD FILTERED (N) | PRESERV. INTACT (Y/n) | ANALYSIS METHOD | ANALYSIS RESULT | DETECTION LIMIT | UNITS | QUALIFIER |
|-------------|------------------------------|---------------|--------------------|-----------------------|-----------------|-----------------|-----------------|-------|-----------|
| 001067      | Nickel                       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 001147      | Selenium                     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 001077      | Silver                       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 000929      | Sodium                       |               |                    |                       |                 |                 |                 | Mg/L  |           |
| 001059      | Thallium                     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 001102      | Tin                          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 001087      | Vanadium                     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 001092      | Zinc                         |               |                    |                       |                 |                 |                 | Ug/L  |           |
|             | <u>ORGANICS</u>              |               |                    |                       |                 |                 |                 |       |           |
| 034205      | Acenaphthene                 |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034200      | Acenaphthylene               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081552      | Acetone                      |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 076997      | Acetonitrile; Methyl cyanide |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081553      | Acetophenone                 |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073501      | 2-Acetylaminofluorene; 2-AAF |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034210      | Acrolein                     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034215      | Acrylonitrile                |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039330      | Aldrin                       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 078109      | Allyl chloride               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077581      | 4-Aminobiphenyl              |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034220      | Anthracene                   |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034030      | Benzene                      |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034526      | Benzo(a)anthracene           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034230      | Benzo(b)fluoranthene         |               |                    |                       |                 |                 |                 | Ug/L  |           |

# ATTACHMENT C

## FRIENDS RECYCLING LLC-C & D DISPOSAL AND RECYCLING

### PARAMETER MONITORING REPORT

Rules 62-701.510(8)(a)&(d) & 62-701.730(4)(b)5, F.A.C.

WACS Report Type: INICD

Initial Ground Water Monitoring (Page 3 of 10)

WACS\_FACILITY 21012

SAMPLING DATE/TIME \_\_\_\_\_

WACS\_WELL \_\_\_\_\_

SAMPLING METHOD \_\_\_\_\_

MONITORING\_SITE\_NUM \_\_\_\_\_

WELL TYPE: (CO) Compliance (DE) Detection

Well Purged prior to  
Sample Collection? (Y/N) \_\_\_\_\_

Ground water classification: G-II

| STORET CODE | PARAMETER MONITORED                | ANALYSIS DATE | FIELD FILTERED (N) | PRESERV. INTACT (Y/n) | ANALYSIS METHOD | ANALYSIS RESULT | DETECTION LIMIT | UNITS | QUALIFIER |
|-------------|------------------------------------|---------------|--------------------|-----------------------|-----------------|-----------------|-----------------|-------|-----------|
| 034242      | Benzo(k)fluoranthene               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034247      | Benzo(a)pyrene                     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034521      | Benzo(g,h,i)perylene               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077147      | Benzyl alcohol                     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039337      | alpha-BHC                          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039338      | beta-BHC                           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 046323      | delta-BHC                          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039340      | gamma-BHC; Lindane                 |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034273      | Bis(2-chloroethyl)ether            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034278      | Bis(2-chloroethoxy)methane         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073522      | Bis (2-chloro-1-methylethyl) ether |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039100      | Bis(2-ethylhexyl)phthalate         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073085      | Bromochloromethane                 |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 032101      | Bromodichloromethane               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 032104      | Bromoform                          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034413      | Bromomethane                       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034636      | 4-Bromophenyl phenyl ether         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034292      | Butyl benzyl phthalate             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077041      | Carbon Disulfide                   |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 032102      | Carbon Tetrachloride               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039350      | Chlordane                          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073529      | p-Chloroaniline                    |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034301      | Chlorobenzene                      |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039460      | Chlorobenzilate                    |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034452      | p-chloro-m-cresol                  |               |                    |                       |                 |                 |                 | Ug/L  |           |

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### PARAMETER MONITORING REPORT

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SAMPLING DATE/TIME \_\_\_\_\_

WACS\_WELL \_\_\_\_\_

SAMPLING METHOD \_\_\_\_\_

MONITORING\_SITE\_NUM \_\_\_\_\_

WELL TYPE: (CO) Compliance (DE) Detection

Well Purged prior to  
Sample Collection? (Y/N) \_\_\_\_\_

Ground water classification: G-II

| STORET CODE | PARAMETER MONITORED                   | ANALYSIS DATE | FIELD FILTERED (N) | PRESERV. INTACT (Y/n) | ANALYSIS METHOD | ANALYSIS RESULT | DETECTION LIMIT | UNITS | QUALIFIER |
|-------------|---------------------------------------|---------------|--------------------|-----------------------|-----------------|-----------------|-----------------|-------|-----------|
| 034311      | Chloroethane                          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 032106      | Chloroform                            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034418      | Chloromethane                         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034581      | 2-Chloronaphthalene                   |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034586      | 2-Chlorophenol                        |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034641      | 4-Chloropheny phenyl ether            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081520      | Chloroprene                           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034320      | Chrysene                              |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077151      | m-Cresol                              |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077152      | o-Cresol                              |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077146      | p-Cresol                              |               |                    |                       |                 |                 |                 | Mg/l  |           |
| 000720      | Cyanide                               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039730      | 2,4-D; 2,4-Dichlorophenoxyacetic acid |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039360      | 4,4-DDD                               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039365      | 4,4-DDE                               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039370      | 4,4-DDT                               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073540      | Diallate                              |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034556      | Dibenz(a,h)anthracene                 |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081302      | Dibenzofuran                          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 032105      | Dibromochloromethane                  |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 049146      | 1,2-Dibromo-3-chloropropane           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077651      | 1,2-Dibromoethane                     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039110      | Di-n-butylphthalate                   |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034536      | 1,2-Dichlorobenzene                   |               |                    |                       |                 |                 |                 | Ug/L  |           |

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SAMPLING DATE/TIME \_\_\_\_\_

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|-------------|--------------------------------|---------------|--------------------|-----------------------|-----------------|-----------------|-----------------|-------|-----------|
| 034566      | 1,3-Dichlorobenzene            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034571      | 1,4-Dichlorobenzene            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034631      | 3,3-Dichlorobenzidine          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 049263      | trans-1,4-Dichloro-2-butene    |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034668      | Dichlorodifluoromethane        |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034496      | 1,1-Dichloroethane             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034531      | 1,2-Dichloroethane             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034501      | 1,1-Dichloroethene             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077093      | cis-1,2-Dichloroethene         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034546      | trans-1,2-Dichloroethene       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034601      | 2,4-Dichlorophenol             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077541      | 2,6-Dichlorophenol             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034541      | 1,2-Dichloropropane            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077173      | 1,3-Dichloropropane            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077170      | 2,2-Dichloropropane            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077168      | 1,1-Dichloropropene            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034704      | cis-1,3-Dichloropropene        |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034699      | trans-1,3-Dichloropropene      |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039380      | Dieldrin                       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034336      | Diethyl phthalate              |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073553      | Thionazin                      |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 046314      | Dimethoate                     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073558      | p-(Dimethylamino)azobenzene    |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073559      | 7,12-Dimethylbenz(a)anthracene |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 082213      | 3,3-Dimethylbenzidine          |               |                    |                       |                 |                 |                 | Ug/L  |           |

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|-------------|----------------------------|---------------|--------------------|-----------------------|-----------------|-----------------|-----------------|-------|-----------|
| 034606      | 2,4-Dimethylphenol         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034341      | Dimethyl phthalate         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 045622      | m-Dinitrobenzene           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034657      | 2-Methyl-4,6-dinitrophenol |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034616      | 2,4-Dinitrophenol          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034611      | 2,4-Dinitrotoluene         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034626      | 2,6-Dinitrotoluene         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081287      | DNBP (Dinoseb)             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034596      | Di-n-octyl phthalate       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077579      | Diphenylamine              |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081888      | Disulfoton                 |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034361      | Endosulfan I               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034356      | Endosulfan II              |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034351      | Endosulfan sulfate         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039390      | Endrin                     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034366      | Endrin aldehyde            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034371      | Ethylbenzene               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073570      | Ethyl methacrylate         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073571      | Ethyl methanesulfonate     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 038462      | Famphur                    |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034376      | Fluoranthene               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034381      | Fluorene                   |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039410      | Heptachlor                 |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039420      | Heptachlor epoxide         |               |                    |                       |                 |                 |                 | Ug/L  |           |

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|-------------|---------------------------|---------------|--------------------|-----------------------|-----------------|-----------------|-----------------|-------|-----------|
| 039700      | Hexachlorobenzene         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034391      | Hexachlorobutadiene       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034386      | Hexachlorocyclopentadiene |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034396      | Hexachloroethane          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073576      | Hexachloropropene         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034403      | Indeno (1,2,3-c,d) pyrene |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077424      | Iodomethane               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077033      | Isobutyl alcohol          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039430      | Isodrin                   |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034408      | Isophorone                |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073582      | Isosafrole                |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081281      | Kepone                    |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081593      | Methacrylonitrile         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073589      | Methapyrilene             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039480      | Methoxychlor              |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077103      | Methyl butyl ketone       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073591      | 3-Methylcholanthrene      |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081595      | Methyl ethyl ketone       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081597      | Methyl methacrylate       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073595      | Methyl methanesulfonate   |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077416      | 2-Methylnaphthalene       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039600      | Methyl Parathion          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077596      | Methylene Bromide         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034423      | Methylene Chloride        |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081596      | Methyl isobutyl ketone    |               |                    |                       |                 |                 |                 | Ug/L  |           |

# ATTACHMENT C

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|-------------|---------------------------|---------------|--------------------|-----------------------|-----------------|-----------------|-----------------|-------|-----------|
| 034696      | Naphthalene               |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073599      | 1,4-Naphthoquinone        |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073600      | 1-Naphthylamine           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073601      | 2-Naphthylamine           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 078142      | o-Nitroaniline            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 078300      | m-Nitroaniline            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 030342      | p-Nitroaniline            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034447      | Nitrobenzene              |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034591      | 2-Nitrophenol             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034646      | 4-Nitrophenol             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073609      | N-Nitrosodi-n-butylamine  |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073611      | N-Nitrosodiethylamine     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034438      | N-Nitrosodimethylamine    |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034428      | N-Nitrosodipropylamine    |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034433      | N-Nitrosodiphenylamine    |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073613      | N-Nitrosomethylethylamine |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073619      | N-Nitrosopiperidine       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 078206      | N-Nitrosopyrrolidine      |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073622      | 5-Nitro-o-toluidine       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039540      | Parathion                 |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077793      | Pentachlorobenzene        |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 081316      | Pentachloronitrobenzene   |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039032      | Pentachlorophenol         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073626      | Phenacetin                |               |                    |                       |                 |                 |                 | Ug/L  |           |

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|-------------|-----------------------------------|---------------|--------------------|-----------------------|-----------------|-----------------|-----------------|-------|-----------|
| 034461      | Phenanthrene                      |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073628      | p-Phenylenediamine                |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 046313      | Phorate                           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039516      | Polychlorinated biphenyls         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039080      | Pronamide                         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077007      | Propionitrile                     |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034469      | Pyrene                            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077545      | Safrole                           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039760      | Silvex; 2,4,5-TP                  |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077128      | Styrene                           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 000745      | Sulfide                           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039740      | 2,4,5-Trichlorophenoxyacetic acid |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077734      | 1,2,4,5-Tetrachlorobenzene        |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077562      | 1,1,1,2-Tetrachloroethane         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034516      | 1,1,2,2-Tetrachloroethane         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034475      | Tetrachloroethene                 |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077770      | 2,3,4,6-Tetrachlorophenol         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034010      | Toluene                           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077142      | o-Toluidine                       |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039400      | Toxaphene                         |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034551      | 1,2,4-Trichlorobenzene            |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034506      | 1,1,1-Trichloroethane             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034511      | 1,1,2-Trichloroethane             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039180      | Trichloroethene                   |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034488      | Trichlorofluoromethane            |               |                    |                       |                 |                 |                 | Ug/L  |           |



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|-------------|---------------------------------|---------------|--------------------|-----------------------|-----------------|-----------------|-----------------|-------|-----------|
| 077687      | 2,4,5-Trichlorophenol           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034621      | 2,4,6-Trichlorophenol           |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077443      | 1,2,3-Trichloropropane          |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073652      | 0,0,0-Triethyl phosphorothioate |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 073653      | sym-Trinitrobenzene             |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 077057      | Vinyl Acetate                   |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 039175      | Vinyl Chloride                  |               |                    |                       |                 |                 |                 | Ug/L  |           |
| 034020      | Xylenes                         |               |                    |                       |                 |                 |                 | Ug/L  |           |

**Attachment 3: Aerial 1 –Land Surrounding Friends Recycling**

