

SWISHER INTERNATIONAL, INC.



November 27, 2012

Emerson Raulerson
Florida Department of Environmental
Protection
Northeast District
7777 Baymeadows Way West, Suite 100
Jacksonville, FL 32256

Jabe Breland
Florida Department of Environmental
Protection
Northeast District
7777 Baymeadows Way West, Suite 100
Jacksonville, FL 32256

2012 NOV 29 AM 10:24
NORTHEAST DISTRICT
RECEIVED

Re: Reuse of Swisher Byproduct by Water Recovery, LLC

Dear Emerson and Jabe:

Thank you for meeting with Brenna Durden and me on 31 October, 2012, to discuss the reuse of tobacco byproducts by Water Recovery, LLC. Per your request it is my pleasure to provide this letter describing the proposed reuse of the tobacco byproducts and enclosing the TCLP results.

Water Recovery ("WR") will receive the tobacco byproducts from Swisher. The byproducts consist of cigar seconds and tobacco leaf and stems resulting from the manufacture of cigars at our plant here in Jacksonville. WR will use them as raw materials in the treatment and processing of wastewaters received at their Centralized Wastewater Treatment plant located at 1819 Albert Street, Jacksonville, Florida, as solidifiers and stabilization agents. Swisher will be providing approximately ten tons to Water Recovery on a weekly basis.

The enclosed report, prepared by ALS Environmental and dated November 5, 2012, contains the results from a full TCLP analysis of the solids resulting from a trial using the Swisher byproducts to stabilize typical WR wastewaters. WR has reviewed the report and finds the data consistent with their expectation, that the Swisher byproduct would be suitable for reuse at WR. The trial generated a non-hazardous solids material based on review of the attached TCLP report.

During the course of our meeting on 31 October, you indicated that you would complete some additional inquiry to ensure that no regulations or requirements exist which could impact the proposed reuse of these tobacco byproducts, such as any hazardous substance provisions applicable to nicotine. It is my understanding that you have completed your investigation and determined that there are no regulations, restrictions or prohibitions applicable to the proposed reuse of the tobacco byproducts and that neither Swisher nor WR needs to provide any further information to you or obtain any authorization from the Department prior to implementing reuse of the tobacco byproducts. As a result, Swisher has begun to

provide tobacco byproducts to WR on a weekly basis. If this is not accurate, please contact me immediately at (904)353-4311, extension 3369.

Again, thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Wood", with a stylized flourish at the end.

David Wood
Director of Engineering
Swisher International, Inc.
dwood@swisher.com

cc: Greg Reynolds, Water Recovery (w/ encl.)
Brenna M. Durden, Esquire (w/ encl.)



Water Recovery, LLC

Mr. David Wood
Director of Engineering
Swisher International Inc.
459 E 16th Street
Jacksonville, Florida 32206

November 8, 2012

Re: Beneficial Reuse of Swisher Byproducts TCLP Analytical

Dear Mr. Wood,

Attached you'll find Report J1205059 to reference the analysis for TCLP Regulatory levels on Water Recovery LLC's solidification process with Swisher's byproduct material.
All of the parameters were under or "Not Detected" with the sample tested.

The sample was formed with 1200 gallons of industrial waste water and 1000 pounds of Swisher's byproducts in a rectangular pit. After the sample finished with the mixing process, a grab sample was collected from four corners of the pit and two additional were grabbed from the left and the right middle of the pit to ensure a representative sample for analysis.

Please feel free to contact us with any questions or concerns.

Sincerely,

Ken Khim
Plant Chemist
Water Recovery, LLC
kkhim@wrijax.com

DEP
NORTHEAST DISTRICT
RECEIVED
2012 NOV 29 AM 10:24



November 05, 2012

Service Request No: J1205059

Ken Khim
Water Recovery, LLC
1819 Albert Street
Jacksonville, FL 32202

Laboratory Results for: Sludge TCLP

Dear Ken,

Enclosed are the results of the sample(s) submitted to our laboratory October 17, 2012. For your reference, these analyses have been assigned our service request number **J1205059**.

All analyses were performed according to our laboratory's quality assurance program. The test results meet requirements of the NELAP standards except as noted in the case narrative report. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report. In accordance to the NELAC 2003 Standard, a statement on the estimated uncertainty of measurement of any quantitative analysis will be supplied upon request.

Please contact me if you have any questions. My extension is 4410. You may also contact me via email at Jerry.Allen@alsglobal.com.

Respectfully submitted,

Columbia Analytical Services, Inc. dba ALS Environmental

Jerry Allen
Project Manager

2012 NOV 29 AM 10:59
NORTH EAST DISTRICT
RECEIVED

ADDRESS 9143 Phillips Highway, Suite 200, Jacksonville, FL 32256
PHONE +1 904 739 2277 | FAX +1 904 739 2011
Columbia Analytical Services, Inc.
Part of the ALS Group A Campbell Brothers Limited Company



Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request: J1205059
Date Received: 10/17/12

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for samples designated for Tier II data deliverables, including results of QC samples analyzed from this delivery group. When appropriate to the procedure, method blank results have been reported with each analytical test. Analytical procedures performed by the lab are validated in accordance with NELAC standards. Parameters that are included in the NELAC Fields of Testing but are not included in the lab's NELAC accreditation are identified in the discussion of each analytical procedure.

Sample Receipt

One soil sample was received for analysis at Columbia Analytical Services on 10/17/12. The sample was received in good condition and consistent with the accompanying chain of custody form. Samples are refrigerated at $\leq 6^{\circ}\text{C}$ upon receipt at the lab except for aqueous samples designated for metals analyses, which are stored at room temperature.

Volatile Organic Analyses:

No significant data anomalies were noted with this analysis.

Semi-Volatile Organic Analyses:

Method 8270C: The matrix spike recovery of 2,4,6-Trichlorophenol for sample SP101612 was outside control criteria. Recovery in the Laboratory Control Sample (LCS) was acceptable, which indicates the analytical batch was in control. The matrix spike outlier suggests a potential bias in this matrix. No further corrective action was appropriate.

Method 8270C: The Relative Percent Difference (RPD) for the following analyte in the replicate matrix spike analyses of sample SP101612 was outside control criteria: 2,4,5-Trichlorophenol. All spike recoveries in the MS, DMS, and associated Laboratory Control Sample (LCS) were within acceptance limits, indicating the analytical batch was in control. No further corrective action was appropriate.

Metals Analyses:

No significant data anomalies were noted with this analysis.

General Chemistry Analyses:

No significant data anomalies were noted with this analysis.

Approved by

Date 11/5/2012

State Certifications, Accreditations, and Licenses

Agency	Number	Expire Date
Florida Department of Health	E82502	6/30/2013
North Carolina Department of Environment and Natural Resources	527	12/31/2012
Virginia Environmental Accreditation Program	460191	12/14/2012
Louisiana Department of Environmental Quality	02086	6/30/2013
Georgia Department of Natural Resources	958	6/30/2013
Kentucky Division of Waste Management	63	7/5/2013
South Carolina Department of Health and Environmental Control	96021001	6/30/2013
Texas Commision on Environmental Quality	T104704197-09-TX	5/31/2013
Maine Department of Health and Human Services	2011006	2/3/2013
Department of Defense	66206	5/31/2013

Data Qualifiers

Florida-DEP

- ! Data deviates from historically established concentration ranges
- * Not reported due to interference
- ? Data is rejected and should not be used
- A Value reported is the arithmetic mean of two or more determinations
- B Results based upon colony counts outside the acceptable range.
- D Measurement was made in the field.
- E Extra samples were taken at composite stations
- H Value based on field kit determination; results may not be accurate.
- I The reported value is between the laboratory method detection limit and the laboratory PQL.
- J Estimated value.
- K Off scale low. The value is less than the lowest calibration standard.
- L Off scale high. The analyte is above the acceptable level of quantitation.
- M The MDL/MRL has been elevated because the analyte could not be accurately quantified.
- N Presumptive evidence of presence of material.
- O Sampled, but analysis lost or not performed
- Q Sample held beyond the acceptable holding time.
- R Significant rain in the past 48 hours (typically in excess of 0.5 inches)
- T Estimated value, less than the MDL
- U Indicates that the compound was analyzed for but not detected.
- V Indicates that the analyte was detected in both the sample and the associated method blank.
- X Insufficient individuals were present in the sample to achieve a minimum of 280 organisms for identification (Stream Condition Index Analysis only)
- Y The laboratory analysis was from an unpreserved or improperly preserved sample.
- Z Too many colonies were present, the numeric value represents the filtration volume

ALS Laboratory Group

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

Client: Water Recovery, LLC
Project: Sludge TCLP

Service Request:J1205059

SAMPLE CROSS-REFERENCE

<u>SAMPLE #</u>	<u>CLIENT SAMPLE ID</u>	<u>DATE</u>	<u>TIME</u>
J1205059-001	SP101612	10/16/2012	1300

COLUMBIA ANALYTICAL SERVICES, INC.

Now part of the ALS Group

Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request: J1205059
Date Collected: 10/16/12 13:00
Date Received: 10/17/12 10:15

Sample Name: SP101612
Lab Code: J1205059-001

Units: mg/L
Basis: As Received

TCLP Volatile Organics by GC/MS

Analysis Method: 8260B

Pre-Prep Method: EPA 1311

Pre-Prep Date: 10/23/12

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Q
1,1-Dichloroethene (1,1-DCE)	0.0160 U	0.100	0.0160	100	10/28/12 00:37	
1,2-Dichloroethane	0.0220 U	0.100	0.0220	100	10/28/12 00:37	
1,4-Dichlorobenzene	0.0160 U	0.100	0.0160	100	10/28/12 00:37	
2-Butanone (MEK)	0.380 U	2.50	0.380	100	10/28/12 00:37	
Benzene	0.0210 U	0.100	0.0210	100	10/28/12 00:37	
Carbon Tetrachloride	0.0340 U	0.100	0.0340	100	10/28/12 00:37	
Chlorobenzene	0.0160 U	0.100	0.0160	100	10/28/12 00:37	
Chloroform	0.0350 U	0.100	0.0350	100	10/28/12 00:37	
Tetrachloroethene (PCE)	0.0220 U	0.100	0.0220	100	10/28/12 00:37	
Trichloroethene (TCE)	0.0361 U	0.100	0.0361	100	10/28/12 00:37	
Vinyl Chloride	0.0361 U	0.100	0.0361	100	10/28/12 00:37	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
1,2-Dichloroethane-d4	106	72 - 121	10/28/12 00:37	
4-Bromofluorobenzene	101	86 - 113	10/28/12 00:37	
Dibromofluoromethane	100	86 - 112	10/28/12 00:37	
Toluene-d8	99	88 - 115	10/28/12 00:37	

COLUMBIA ANALYTICAL SERVICES, INC.

Now part of the ALS Group

Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid
Sample Name: SP101612
Lab Code: J1205059-001

Service Request: J1205059
Date Collected: 10/16/12 13:00
Date Received: 10/17/12 10:15
Units: mg/L
Basis: As Received

TCLP Semivolatile Organic Compounds by GC/MS

Analysis Method: 8270C
Prep Method: EPA 3510C

Pre-Prep Method: EPA 1311
Pre-Prep Date: 10/22/12

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
o-Cresol, TCLP	0.0131 U	0.0500	0.0131	1	10/26/12 16:13	10/25/12	
m,p-Cresols, TCLP	0.0100 U	0.0500	0.0100	1	10/26/12 16:13	10/25/12	
2,4-Dinitrotoluene, TCLP	0.0131 U	0.0500	0.0131	1	10/26/12 16:13	10/25/12	
Hexachlorobenzene, TCLP	0.0170 U	0.0500	0.0170	1	10/26/12 16:13	10/25/12	
Hexachlorobutadiene, TCLP	0.0120 U	0.0500	0.0120	1	10/26/12 16:13	10/25/12	
Hexachloroethane, TCLP	0.00811 U	0.0500	0.00811	1	10/26/12 16:13	10/25/12	
Nitrobenzene, TCLP	0.0210 U	0.0500	0.0210	1	10/26/12 16:13	10/25/12	
Pentachlorophenol (PCP), TCLP	0.0110 U	0.200	0.0110	1	10/26/12 16:13	10/25/12	
Pyridine, TCLP	0.0110 U	0.200	0.0110	1	10/26/12 16:13	10/25/12	
2,4,5-Trichlorophenol, TCLP	0.0131 U	0.0500	0.0131	1	10/26/12 16:13	10/25/12	
2,4,6-Trichlorophenol, TCLP	0.00890 U	0.0500	0.00890	1	10/26/12 16:13	10/25/12	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
2,4,6-Tribromophenol	53	13 - 133	10/26/12 16:13	
2-Fluorobiphenyl	60	22 - 105	10/26/12 16:13	
2-Fluorophenol	29	10 - 69	10/26/12 16:13	
Nitrobenzene-d5	54	10 - 123	10/26/12 16:13	
Phenol-d6	28	10 - 59	10/26/12 16:13	
p-Terphenyl-d14	58	28 - 120	10/26/12 16:13	

COLUMBIA ANALYTICAL SERVICES, INC.

Now part of the ALS Group

Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Sample Name: SP101612
Lab Code: J1205059-001

Service Request: J1205059
Date Collected: 10/16/12 13:00
Date Received: 10/17/12 10:15

Units: mg/L
Basis: As Received

TCLP Organochlorine Pesticides by Gas Chromatography

Analysis Method: 8081A
Prep Method: EPA 3510C

Pre-Prep Method: EPA 1311
Pre-Prep Date: 10/22/12

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
Chlordane, TCLP	0.00131 U	0.0500	0.00131	1	10/29/12 21:47	10/25/12	
Endrin, TCLP	0.0000791 U	0.000200	0.0000791	1	10/29/12 21:47	10/25/12	
gamma-BHC (Lindane), TCLP	0.000180 U	0.000200	0.000180	1	10/29/12 21:47	10/25/12	
Heptachlor, TCLP	0.0000670 U	0.000200	0.0000670	1	10/29/12 21:47	10/25/12	
Heptachlor Epoxide, TCLP	0.0000930 U	0.000200	0.0000930	1	10/29/12 21:47	10/25/12	
Methoxychlor, TCLP	0.0000770 U	0.000400	0.0000770	1	10/29/12 21:47	10/25/12	
Toxaphene, TCLP	0.00261 U	0.00500	0.00261	1	10/29/12 21:47	10/25/12	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
Decachlorobiphenyl	32	10 - 160	10/29/12 21:47	
Tetrachloro-m-xylene	37	22 - 126	10/29/12 21:47	

COLUMBIA ANALYTICAL SERVICES, INC.

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Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid
Sample Name: SP101612
Lab Code: J1205059-001

Service Request: J1205059
Date Collected: 10/16/12 13:00
Date Received: 10/17/12 10:15
Units: ug/L
Basis: As Received

TCLP Chlorinated Herbicides by GC

Analysis Method: 8151A
Prep Method: Method

Pre-Prep Method: EPA 1311
Pre-Prep Date: 10/22/12

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
2,4-D	0.60 U	25	0.60	5.0	10/30/12 10:42	10/26/12	
2,4,5-TP (Silvex)	150	25	0.40	5.0	10/30/12 10:42	10/26/12	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
DCAA	64	12 - 131	10/30/12 10:42	

COLUMBIA ANALYTICAL SERVICES, INC.

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Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid
Sample Name: SP101612
Lab Code: J1205059-001

Service Request: J1205059
Date Collected: 10/16/12 13:00
Date Received: 10/17/12 10:15
Basis: As Received

Toxicity Characteristics Leachate Procedure (TCLP)**Inorganic Parameters****Pre-Prep Method:** EPA 1311

Analyte Name	Analysis Method	Result	Units	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
Arsenic, TCLP	6010B	0.06 I	mg/L	0.10	0.04	1	10/24/12 18:23	10/24/12	
Barium, TCLP	6010B	0.22 V	mg/L	0.10	0.003	1	10/24/12 18:23	10/24/12	
Cadmium, TCLP	6010B	0.002 U	mg/L	0.050	0.002	1	10/24/12 18:23	10/24/12	
Chromium, TCLP	6010B	0.005 U	mg/L	0.10	0.005	1	10/24/12 18:23	10/24/12	
Lead, TCLP	6010B	0.04 U	mg/L	0.10	0.04	1	10/24/12 18:23	10/24/12	
Mercury, TCLP	7470A	0.0010 U	mg/L	0.0010	0.0010	1	10/25/12 11:18	10/24/12	
Selenium, TCLP	6010B	0.07 U	mg/L	0.10	0.07	1	10/24/12 18:23	10/24/12	
Silver, TCLP	6010B	0.02 U	mg/L	0.10	0.02	1	10/24/12 18:23	10/24/12	

COLUMBIA ANALYTICAL SERVICES, INC.

Now part of the ALS Group

Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid
Sample Name: SP101612
Lab Code: J1205059-001

Service Request: J1205059
Date Collected: 10/16/12 13:00
Date Received: 10/17/12 10:15
Basis: As Received

General Chemistry Parameters

Analyte Name	Analysis Method	Result	Units	MRL	MDL	Dil.	Date Analyzed	Q
Solids, Total	160.3 Modified	72	Percent	0.10	0.10	1	10/18/12 14:09	

COLUMBIA ANALYTICAL SERVICES, INC.

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Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Sample Name: Method Blank
Lab Code: JQ1206809-01

Service Request: J1205059
Date Collected: NA
Date Received: NA

Units: mg/L
Basis: As Received

TCLP Volatile Organics by GC/MS

Analysis Method: 8260B

Pre-Prep Method: EPA 1311

Pre-Prep Date: 10/23/12

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Q
1,1-Dichloroethene (1,1-DCE)	0.0160 U	0.100	0.0160	100	10/27/12 22:31	
1,2-Dichloroethane	0.0220 U	0.100	0.0220	100	10/27/12 22:31	
1,4-Dichlorobenzene	0.0160 U	0.100	0.0160	100	10/27/12 22:31	
2-Butanone (MEK)	0.380 U	2.50	0.380	100	10/27/12 22:31	
Benzene	0.0210 U	0.100	0.0210	100	10/27/12 22:31	
Carbon Tetrachloride	0.0340 U	0.100	0.0340	100	10/27/12 22:31	
Chlorobenzene	0.0160 U	0.100	0.0160	100	10/27/12 22:31	
Chloroform	0.0350 U	0.100	0.0350	100	10/27/12 22:31	
Tetrachloroethene (PCE)	0.0220 U	0.100	0.0220	100	10/27/12 22:31	
Trichloroethene (TCE)	0.0361 U	0.100	0.0361	100	10/27/12 22:31	
Vinyl Chloride	0.0361 U	0.100	0.0361	100	10/27/12 22:31	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
1,2-Dichloroethane-d4	106	72 - 121	10/27/12 22:31	
4-Bromofluorobenzene	99	86 - 113	10/27/12 22:31	
Dibromofluoromethane	100	86 - 112	10/27/12 22:31	
Toluene-d8	95	88 - 115	10/27/12 22:31	

COLUMBIA ANALYTICAL SERVICES, INC.

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Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request: J1205059
Date Collected: NA
Date Received: NA

Sample Name: Method Blank
Lab Code: JQ1206811-01

Units: mg/L
Basis: As Received

TCLP Semivolatile Organic Compounds by GC/MS

Analysis Method: 8270C
Prep Method: EPA 3510C

Pre-Prep Method: EPA 1311
Pre-Prep Date: 10/22/12

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
o-Cresol, TCLP	0.0131 U	0.0500	0.0131	1	10/26/12 13:37	10/25/12	
m,p-Cresols, TCLP	0.0100 U	0.0500	0.0100	1	10/26/12 13:37	10/25/12	
2,4-Dinitrotoluene, TCLP	0.0131 U	0.0500	0.0131	1	10/26/12 13:37	10/25/12	
Hexachlorobenzene, TCLP	0.0170 U	0.0500	0.0170	1	10/26/12 13:37	10/25/12	
Hexachlorobutadiene, TCLP	0.0120 U	0.0500	0.0120	1	10/26/12 13:37	10/25/12	
Hexachloroethane, TCLP	0.00811 U	0.0500	0.00811	1	10/26/12 13:37	10/25/12	
Nitrobenzene, TCLP	0.0210 U	0.0500	0.0210	1	10/26/12 13:37	10/25/12	
Pentachlorophenol (PCP), TCLP	0.0110 U	0.200	0.0110	1	10/26/12 13:37	10/25/12	
Pyridine, TCLP	0.0110 U	0.200	0.0110	1	10/26/12 13:37	10/25/12	
2,4,5-Trichlorophenol, TCLP	0.0131 U	0.0500	0.0131	1	10/26/12 13:37	10/25/12	
2,4,6-Trichlorophenol, TCLP	0.00890 U	0.0500	0.00890	1	10/26/12 13:37	10/25/12	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
2,4,6-Tribromophenol	66	13 - 133	10/26/12 13:37	
2-Fluorobiphenyl	66	22 - 105	10/26/12 13:37	
2-Fluorophenol	58	10 - 69	10/26/12 13:37	
Nitrobenzene-d5	63	10 - 123	10/26/12 13:37	
Phenol-d6	36	10 - 59	10/26/12 13:37	
p-Terphenyl-d14	75	28 - 120	10/26/12 13:37	

COLUMBIA ANALYTICAL SERVICES, INC.

Now part of the ALS Group

Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request: J1205059
Date Collected: NA
Date Received: NA

Sample Name: Method Blank
Lab Code: JQ1206811-01

Units: mg/L
Basis: As Received

TCLP Organochlorine Pesticides by Gas Chromatography

Analysis Method: 8081A
Prep Method: EPA 3510C

Pre-Prep Method: EPA 1311
Pre-Prep Date: 10/22/12

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
Chlordane, TCLP	0.00131 U	0.0500	0.00131	1	10/29/12 20:03	10/25/12	
Endrin, TCLP	0.0000791 U	0.000200	0.0000791	1	10/29/12 20:03	10/25/12	
gamma-BHC (Lindane), TCLP	0.000180 U	0.000200	0.000180	1	10/29/12 20:03	10/25/12	
Heptachlor, TCLP	0.0000670 U	0.000200	0.0000670	1	10/29/12 20:03	10/25/12	
Heptachlor Epoxide, TCLP	0.0000930 U	0.000200	0.0000930	1	10/29/12 20:03	10/25/12	
Methoxychlor, TCLP	0.0000770 U	0.000400	0.0000770	1	10/29/12 20:03	10/25/12	
Toxaphene, TCLP	0.00261 U	0.00500	0.00261	1	10/29/12 20:03	10/25/12	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
Decachlorobiphenyl	63	10 - 160	10/29/12 20:03	
Tetrachloro-m-xylene	50	22 - 126	10/29/12 20:03	

COLUMBIA ANALYTICAL SERVICES, INC.

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Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request: J1205059**Date Collected:** NA**Date Received:** NA**Sample Name:** Method Blank**Units:** ug/L**Lab Code:** JQ1206811-01**Basis:** As Received**TCLP Chlorinated Herbicides by GC****Analysis Method:** 8151A**Pre-Prep Method:** EPA 1311**Prep Method:** Method**Pre-Prep Date:** 10/22/12

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
2,4-D	0.12 U	5.0	0.12	1	10/29/12 17:34	10/26/12	
2,4,5-TP (Silvex)	0.080 U	5.0	0.080	1	10/29/12 17:34	10/26/12	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
DCAA	93	12 - 131	10/29/12 17:34	

COLUMBIA ANALYTICAL SERVICES, INC.

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Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid
Sample Name: Method Blank
Lab Code: RQ1212836-01

Service Request: J1205059
Date Collected: NA
Date Received: NA

Units: ug/L
Basis: As Received

TCLP Chlorinated Herbicides by GC

Analysis Method: 8151A
Prep Method: Method

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
2,4-D	0.12 U	5.0	0.12	1	10/29/12 10:54	10/26/12	
2,4,5-TP (Silvex)	0.080 U	5.0	0.080	1	10/29/12 10:54	10/26/12	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
DCAA	80	12 - 131	10/29/12 10:54	

COLUMBIA ANALYTICAL SERVICES, INC.

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Analytical Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid
Sample Name: Method Blank
Lab Code: J1205059-MB1

Service Request: J1205059
Date Collected: NA
Date Received: NA

Basis: As Received

Toxicity Characteristics Leachate Procedure (TCLP)

Inorganic Parameters

Pre-Prep Method: EPA 1311

Analyte Name	Analysis Method	Result	Units	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
Arsenic, TCLP	6010B	0.04 U	mg/L	0.10	0.04	1	10/24/12 18:16	10/24/12	
Barium, TCLP	6010B	0.04 I	mg/L	0.10	0.003	1	10/24/12 18:16	10/24/12	
Cadmium, TCLP	6010B	0.002 U	mg/L	0.050	0.002	1	10/24/12 18:16	10/24/12	
Chromium, TCLP	6010B	0.005 U	mg/L	0.10	0.005	1	10/24/12 18:16	10/24/12	
Lead, TCLP	6010B	0.04 U	mg/L	0.10	0.04	1	10/24/12 18:16	10/24/12	
Mercury, TCLP	7470A	0.0010 U	mg/L	0.0010	0.0010	1	10/25/12 11:14	10/24/12	
Selenium, TCLP	6010B	0.07 U	mg/L	0.10	0.07	1	10/24/12 18:16	10/24/12	
Silver, TCLP	6010B	0.02 U	mg/L	0.10	0.02	1	10/24/12 18:16	10/24/12	

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request: J1205059

SURROGATE RECOVERY SUMMARY
TCLP Volatile Organics by GC/MS

Analysis Method: 8260B

Sample Name	Lab Code	1,2-Dichloroethane-d4	4-Bromofluorobenzene	Dibromofluoromethane
		72 - 121	86 - 113	86 - 112
SP101612	J1205059-001	106	101	100
Method Blank	JQ1206809-01	106	99	100
Lab Control Sample	JQ1206947-01	106	97	101

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC

Service Request: J1205059

Project: Sludge TCLP

Sample Matrix: Sludge, Solid

SURROGATE RECOVERY SUMMARY

TCLP Volatile Organics by GC/MS

Analysis Method: 8260B

Sample Name	Lab Code	Toluene-d8
		88 - 115
SP101612	J1205059-001	99
Method Blank	JQ1206809-01	95
Lab Control Sample	JQ1206947-01	96

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC**Project:** Sludge TCLP**Sample Matrix:** Sludge, Solid**Service Request:**J1205059**Date Analyzed:**10/27/12**Lab Control Sample Summary
TCLP Volatile Organics by GC/MS****Analysis Method:** 8260B**Units:**mg/L**Basis:**As Received**Analysis Lot:**315869**Lab Control Sample
JQ1206947-01**

Analyte Name	Result	Spike Amount	% Rec	% Rec Limits
1,1-Dichloroethene (1,1-DCE)	0.0203	0.0200	102	79-123
1,2-Dichloroethane	0.0209	0.0200	104	73-120
1,4-Dichlorobenzene	0.0187	0.0200	94	77-117
2-Butanone (MEK)	0.0988	0.100	99	38-152
Benzene	0.0196	0.0200	98	83-118
Carbon Tetrachloride	0.0206	0.0200	103	67-129
Chlorobenzene	0.0189	0.0200	95	83-122
Chloroform	0.0200	0.0200	100	81-118
Tetrachloroethene (PCE)	0.0176	0.0200	88	77-129
Trichloroethene (TCE)	0.0193	0.0200	96	81-120
Vinyl Chloride	0.0248	0.0200	124	72-133

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC**Service Request:** J1205059**Project:** Sludge TCLP**Sample Matrix:** Sludge, Solid**SURROGATE RECOVERY SUMMARY**
TCLP Semivolatile Organic Compounds by GC/MS**Analysis Method:** 8270C**Extraction Method:** EPA 3510C

Sample Name	Lab Code	2,4,6-Tribromophenol	2-Fluorobiphenyl	2-Fluorophenol
		13 - 133	22 - 105	10 - 69
SP101612	J1205059-001	53	60	29
Method Blank	JQ1206811-01	66	66	58
Lab Control Sample	JQ1206811-02	61	63	46
SP101612	JQ1206879-01	47	65	35
SP101612	JQ1206879-02	49	49	39

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC**Service Request:** J1205059**Project:** Sludge TCLP**Sample Matrix:** Sludge, Solid**SURROGATE RECOVERY SUMMARY**

TCLP Semivolatile Organic Compounds by GC/MS

Analysis Method: 8270C**Extraction Method:** EPA 3510C

Sample Name	Lab Code	Nitrobenzene-d5	Phenol-d6	p-Terphenyl-d14
		10 - 123	10 - 59	28 - 120
SP101612	J1205059-001	54	28	58
Method Blank	JQ1206811-01	63	36	75
Lab Control Sample	JQ1206811-02	57	34	65
SP101612	JQ1206879-01	58	31	61
SP101612	JQ1206879-02	45	27	48

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request: J1205059

SURROGATE RECOVERY SUMMARY
TCLP Semivolatile Organic Compounds by GC/MS

Analysis Method: 8270C
Extraction Method: EPA 3510C

Sample Name	Lab Code
SP101612	J1205059-001
Method Blank	JQ1206811-01
Lab Control Sample	JQ1206811-02
SP101612	JQ1206879-01
SP101612	JQ1206879-02

COLUMBIA ANALYTICAL SERVICES, INC.

Now part of the ALS Group

QA/QC Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request:J1205059**Date Collected:**10/16/12**Date Received:**10/17/12**Date Analyzed:**10/26/12**Date Extracted:**10/25/12

Duplicate Matrix Spike Summary
TCLP Semivolatile Organic Compounds by GC/MS

Sample Name: SP101612
Lab Code: J1205059-001
Analysis Method: 8270C
Prep Method: EPA 3510C

Units:mg/L**Basis:**As Received

Analyte Name	Sample Result	Matrix Spike JQ1206879-01			Duplicate Matrix Spike JQ1206879-02			% Rec Limits	RPD	RPD Limit
		Result	Spike Amount	% Rec	Result	Spike Amount	% Rec			
2,4,5-Trichlorophenol, TCLP	ND	0.260	0.500	52	0.396	0.500	79	51-126	42*	30
2,4,6-Trichlorophenol, TCLP	ND	0.287	0.500	57	0.238	0.500	48 *	51-120	19	30
2,4-Dinitrotoluene, TCLP	ND	0.436	0.500	87	0.339	0.500	68	59-133	25	30
Hexachlorobenzene, TCLP	ND	0.451	0.500	90	0.351	0.500	70	49-140	25	30
Hexachlorobutadiene, TCLP	ND	0.394	0.500	79	0.309	0.500	62	18-131	24	30
Hexachloroethane, TCLP	ND	0.374	0.500	75	0.298	0.500	60	26-112	22	30
m,p-Cresols, TCLP	ND	0.290	0.500	58	0.305	0.500	61	23-104	5	30
Nitrobenzene, TCLP	ND	0.390	0.500	78	0.308	0.500	62	17-150	24	30
o-Cresol, TCLP	ND	0.392	0.500	78	0.310	0.500	62	26-108	24	30
Pentachlorophenol (PCP), TCLP	ND	0.198	0.500	40	0.269	0.500	54	29-145	30	30
Pyridine, TCLP	ND	0.281	0.500	56	0.226	0.500	45	10-78	22	30

Results flagged with an asterisk (*) indicate values outside control criteria.

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Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request: J1205059
Date Analyzed: 10/26/12
Date Extracted: 10/25/12

Lab Control Sample Summary
TCLP Semivolatile Organic Compounds by GC/MS

Analysis Method: 8270C
Prep Method: EPA 3510C

Units: mg/L
Basis: As Received
Analysis Lot: 316661

Lab Control Sample
JQ1206811-02

Analyte Name	Result	Spike Amount	% Rec	% Rec Limits
o-Cresol, TCLP	0.379	0.500	76	26-108
m,p-Cresols, TCLP	0.375	0.500	75	23-104
2,4-Dinitrotoluene, TCLP	0.450	0.500	90	59-133
Hexachlorobenzene, TCLP	0.447	0.500	89	49-140
Hexachlorobutadiene, TCLP	0.411	0.500	82	18-131
Hexachloroethane, TCLP	0.383	0.500	77	26-112
Nitrobenzene, TCLP	0.385	0.500	77	17-150
Pentachlorophenol (PCP), TCLP	0.382	0.500	76	29-145
Pyridine, TCLP	0.257	0.500	51	10-78
2,4,5-Trichlorophenol, TCLP	0.420	0.500	84	51-126
2,4,6-Trichlorophenol, TCLP	0.425	0.500	85	51-120

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request: J1205059

SURROGATE RECOVERY SUMMARY
TCLP Organochlorine Pesticides by Gas Chromatography

Analysis Method: 8081A
Extraction Method: EPA 3510C

Sample Name	Lab Code	Decachlorobiphenyl	Tetrachloro-m-xylene
		10 - 160	22 - 126
SP101612	J1205059-001	32	37
Method Blank	JQ1206811-01	63	50
Lab Control Sample	JQ1206811-02	67	63
SP101612	JQ1206880-01	33	47
SP101612	JQ1206880-02	31	36

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request: J1205059

SURROGATE RECOVERY SUMMARY
TCLP Chlorinated Herbicides by GC

Analysis Method: 8151A**Extraction Method:** Method

Sample Name	Lab Code	DCAA
		12 - 131
SP101612	J1205059-001	64
Method Blank	JQ1206811-01	93
Method Blank	RQ1212836-01	80
Lab Control Sample	RQ1212836-02	100
Duplicate Lab Control Sample	RQ1212836-03	88

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request: J1205059**Date Collected:** 10/16/12**Date Received:** 10/17/12**Date Analyzed:** 10/29/12**Date Extracted:** 10/25/12

Duplicate Matrix Spike Summary
TCLP Organochlorine Pesticides by Gas Chromatography

Sample Name: SP101612
Lab Code: J1205059-001
Analysis Method: 8081A
Prep Method: EPA 3510C

Units: mg/L**Basis:** As Received

Analyte Name	Sample Result	Matrix Spike JQ1206880-01			Duplicate Matrix Spike JQ1206880-02			% Rec Limits	RPD	RPD Limit
		Result	Spike Amount	% Rec	Result	Spike Amount	% Rec			
Endrin, TCLP	ND	0.00243	0.00400	61	0.00206	0.00400	52	24-141	16	30
gamma-BHC (Lindane), TCLP	ND	0.00217	0.00400	54	0.00211	0.00400	53	26-114	3	30
Heptachlor Epoxide, TCLP	ND	0.00265	0.00400	66	0.00262	0.00400	66	30-124	1	30
Heptachlor, TCLP	ND	0.00230	0.00400	58	0.00199	0.00400	50	27-119	14	30
Methoxychlor, TCLP	ND	0.000700	0.00400	18	0.000810	0.00400	20	18-153	15	30

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Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request:J1205059**Date Analyzed:**10/29/12**Date Extracted:**10/25/12

Lab Control Sample Summary
TCLP Organochlorine Pesticides by Gas Chromatography

Analysis Method: 8081A
Prep Method: EPA 3510C

Units:mg/L
Basis:As Received
Analysis Lot:316084

Lab Control Sample
JQ1206811-02

Analyte Name	Result	Spike Amount	% Rec	% Rec Limits
Endrin, TCLP	0.00312	0.00400	78	24-141
gamma-BHC (Lindane), TCLP	0.00309	0.00400	77	26-114
Heptachlor, TCLP	0.00351	0.00400	88	27-119
Heptachlor Epoxide, TCLP	0.00305	0.00400	76	30-124
Methoxychlor, TCLP	0.00330	0.00400	83	18-153

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request:J1205059**Date Analyzed:**10/29/12**Date Extracted:**10/26/12

Duplicate Lab Control Sample Summary
TCLP Chlorinated Herbicides by GC

Analysis Method: 8151A**Units:**ug/L**Prep Method:** Method**Basis:**As Received**Analysis Lot:**316074

Lab Control Sample
RQ1212836-02

Duplicate Lab Control Sample
RQ1212836-03

Analyte Name	Result	Spike Amount	% Rec	Result	Spike Amount	% Rec	% Rec Limits	RPD	RPD Limit
2,4-D	23.2	25.0	93	28.9	25.0	116	29-146	22	30
2,4,5-TP (Silvex)	24.9	25.0	100	25.3	25.0	101	40-121	1	30

COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC
Project: Sludge TCLP
Sample Matrix: Sludge, Solid

Service Request:J1205059**Date Collected:**10/16/12**Date Received:**10/17/12**Date Analyzed:**10/25/12**Date Extracted:**10/24/12

Duplicate Matrix Spike Summary
Inorganic Parameters

Sample Name: SP101612
Lab Code: J1205059-001
Analysis Method: 7470A
Prep Method: Method

Units:mg/L**Basis:**As Received

Analyte Name	Sample Result	Result	Matrix Spike J1205059-001MS		Result	Duplicate Matrix Spike J1205059-001DMS		% Rec Limits	RPD	RPD Limit
			Spike Amount	% Rec		Spike Amount	% Rec			
Mercury, TCLP	ND	0.0120	0.0125	96	0.0119	0.0125	95	75-125	1	20

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COLUMBIA ANALYTICAL SERVICES, INC.

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QA/QC Report

Client: Water Recovery, LLC**Project:** Sludge TCLP**Sample Matrix:** Sludge, Solid**Service Request:**J1205059**Date Analyzed:**10/24/12 - 10/25/12**Lab Control Sample Summary****Inorganic Parameters****Units:**mg/L**Basis:**As Received**Lab Control Sample**

J1205059-LCS

Analyte Name	Analytical Method	Result	Spike Amount	% Rec	% Rec Limits
Arsenic, TCLP	6010B	5.10	5.00	102	80-120
Barium, TCLP	6010B	5.02	5.00	100	80-120
Cadmium, TCLP	6010B	2.54	2.50	102	80-120
Chromium, TCLP	6010B	5.01	5.00	100	80-120
Lead, TCLP	6010B	5.11	5.00	102	80-120
Mercury, TCLP	7470A	0.0122	0.0125	97	80-120
Selenium, TCLP	6010B	5.25	5.00	105	80-120
Silver, TCLP	6010B	5.10	5.00	102	80-120

Cooler Receipt Form

Client: Water Recovery Service Request #: 5/205059
 Project: _____
 Cooler received on 10/17/12 and opened on 10/17/12 by SL
 COURIER: ☒ ALS ☐ UPS ☐ FEDEX Client Other _____ Airbill # _____

- | | | | |
|----|--|--|---|
| 1 | Were custody seals on outside of cooler? | Yes | <input checked="" type="radio"/> No |
| | If yes, how many and where? | #: _____ on lid | other _____ |
| 2 | Were seals intact and signature and date correct? | Yes | No <input checked="" type="radio"/> N/A |
| 3 | Were custody papers properly filled out? | <input checked="" type="radio"/> Yes | No N/A |
| 4 | Temperature of cooler(s) upon receipt (Should be > 0°C and < 6°C) | <u>1.0°C</u> | |
| 5 | Thermometer ID | <u>187</u> | |
| 6 | Temperature Blank Present? | Yes | <input checked="" type="radio"/> No |
| 7 | Were Ice or Ice Packs present | <input checked="" type="radio"/> Ice Packs | No |
| 8 | Did all bottles arrive in good condition (unbroken, etc....)? | <input checked="" type="radio"/> Yes | No N/A |
| 9 | Type of packing material present | <input checked="" type="radio"/> Netting | Vial Holder Bubble Wrap |
| | | Paper Styrofoam Other | N/A |
| 10 | Were all bottle labels complete (sample ID, preservation, etc....)? | <input checked="" type="radio"/> Yes | No N/A |
| 11 | Did all bottle labels and tags agree with custody papers? | <input checked="" type="radio"/> Yes | No N/A |
| 12 | Were the correct bottles used for the tests indicated? | <input checked="" type="radio"/> Yes | No N/A |
| 13 | Were all of the preserved bottles received with the appropriate preservative? | Yes | No <input checked="" type="radio"/> N/A |
| | HNO ₃ pH<2 H ₂ SO ₄ pH<2 ZnAc ₂ /NaOH pH>9 NaOH pH>12 HCl pH<2 | Preservative additions noted below | |
| 14 | Were all samples received within analysis holding times? | <input checked="" type="radio"/> Yes | No N/A |
| 15 | Were all VOA vials free of air bubbles? If present, note below | Yes | No <input checked="" type="radio"/> N/A |
| 16 | Where did the bottles originate? | <input checked="" type="radio"/> ALS | Client |

Sample ID	Reagent	Lot #	ml added	Initials Date/Time

Additional comments and/or explanation of all discrepancies noted above:

Client approval to run samples if discrepancies noted:

Date:

ALSO

ALIS Contract

9143 Philips Highway, Suite 200 Jacksonville, FL 32256/PH(904) 739-2277 / FAX (904) 739-2011

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