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Environmental Engineering,
Management and Consulting

November 26, 2024

Ms. Becky Jolly
Iowa Department of Natural Resources
Land Quality Bureau
502 E. 9th Street
Des Moines, Iowa 50319

Dear Ms. Jolly:

Re: Fluff Quarterly Sampling Results
Alter Metal Recycling - Council Bluffs, Iowa
4th Quarter 2024

CJF Associates, LLC (CJF) is pleased to submit this report on behalf of Alter Trading Corporation, Council Bluffs, Iowa (Alter). This report presents the quarterly fluff sampling results as identified above.

Summary

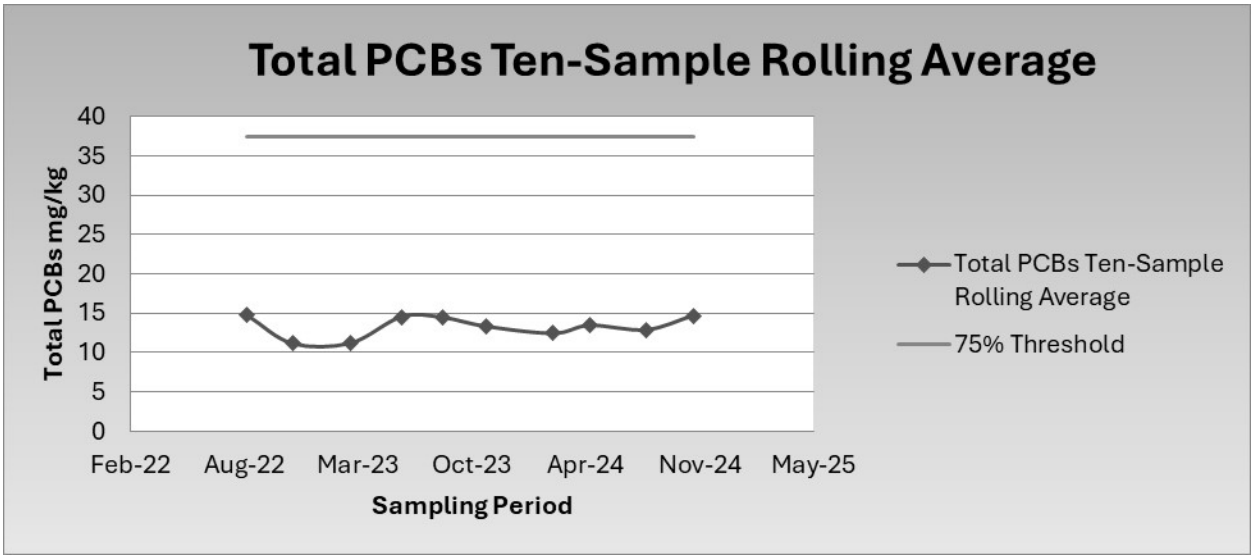
- PCBs concentration this quarter: 22 mg/kg;
- Ten-Sample Rolling PCBs Average: 14.71 mg/kg;
- PCBs TCLP result this quarter is non-detect; and
- All TCLP metal results are below regulatory criteria.

Based on the analytical results; the fluff may be landfilled in Iowa per IAC 567, Chapter 118.

Details

In order to characterize the fluff, samples were collected and analyzed from the bulk seven-day composite sample. The composite sample was collected from September 30 through October 8, 2024 in accordance with IAC 567, Chapter 118. Samples were analyzed for total Polychlorinated Biphenyls (PCBs), Toxic Characteristic Leaching Procedure (TCLP) PCBs, TCLP Resource Conservation and Recovery Act (RCRA) metals, and Ignitability.

Total PCBs results for the sampling period totaled 22 mg/kg. TCLP PCBs were not detected above the laboratory reporting limit. Barium, cadmium, and lead were the only RCRA metals identified above the laboratory reporting limits but below regulatory TCLP concentrations. Lead was detected at a concentration of 0.076 mg/L which does not exceed the regulatory TCLP concentration of 5.0 mg/L. The present ten-sample rolling average for PCBs is 14.71 mg/kg. Rolling averages of the ten-sampling period results for total PCBs are presented below:



Fourth quarter analytical results are summarized as follows:

	Analyte										
Sample ID	Total PCBs[1]	TCLP PCBs	TCLP Arsenic	TCLP Barium	TCLP Cad	TCLP Chrom	TCLP Lead	TCLP Sel	TCLP Silver	TCLP Mercury	Ignitability[2]
ZCSF-102424-001	22	ND	ND	0.69	0.16	ND	0.076	ND	ND	ND	>201

Notes: All TCLP results are reported in mg/L
(1) Results reported in mg/kg
(2) Results reported in degrees Fahrenheit

ND = Not Detected Above Laboratory Detection Limits
NA = Not Analyzed

Laboratory analytical results and chain of custody forms are presented in Attachment A.

If you have any questions, please contact Frank W. Ring at (313) 999-4071.

Sincerely,
CJF Associates, LLC

Frank W. Ring, P.E.

Encl.
CC: Ryan Carpenter, Alter
Ryan Mitchell, Iowa Waste Systems Inc.

ATTACHMENT A

LABORATORY ANALYTICAL RESULTS

eurofins | Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: Charles Ring
CJF Associates, LLC
PO BOX 80815
St. Claire Shores, Michigan 48080

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JOB DESCRIPTION

Alter Council Bluffs Iowa 1216-01

JOB NUMBER

240-213775-1

Eurofins Cleveland
180 S. Van Buren Avenue
Barberton OH 44203

See page two for job notes and contact information.

my EOL

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing North Central, LLC Project Manager.

Authorization

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Authorized for release by
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Definitions/Glossary

Client: CJF Associates, LLC
Job ID: 240-213775-1
Project/Site: Alter Council Bluffs Iowa 1216-01

Qualifiers

Metals

Qualifier	Qualifier Description
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
☼	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Job ID: 240-213775-1 — Eurofins Cleveland

Job Narrative
240-213775-1

Receipt
The samples were received on 10/25/2024 9:30 AM. Unless otherwise noted below, the samples arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 2.5°C.

PCBs
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Metals
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

General Chemistry
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Method Summary

Client: CJF Associates, LLC
Job ID: 240-213775-1
Project/Site: Alter Council Bluffs Iowa 1216-01

Method	Method Description	Protocol	Laboratory
8082A	Polychlorinated Biphenyls (PCBs) by Gas Chromatography	SW846	EET CF
PCB	Total PCB Calculation	TAL SOP	EET CF
6010D	Metals (ICP)	SW846	EET CF
7470A	Mercury (CVAA)	SW846	EET CF
D92	Flashpoint	ASTM	EET CF
Moisture	Percent Moisture	EPA	EET CF
1311	TCLP Extraction	SW846	EET CF
3010A	Preparation, Total Metals	SW846	EET CF
3511	Microextraction of Organic Compounds	SW846	EET CF
3546	Microwave Extraction	SW846	EET CF
7470A	Preparation, Mercury	SW846	EET CF

Protocol References:

ASTM = ASTM International
EPA = US Environmental Protection Agency
SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.
TAL SOP = TestAmerica Laboratories, Standard Operating Procedure

Laboratory References:

EET CF = Eurofins Cedar Falls, 3019 Venture Way, Cedar Falls, IA 50613, TEL (319)277-2401

Sample Summary

Client: CJF Associates, LLC
Project/Site: Alter Council Bluffs Iowa 1216-01

Job ID: 240-213775-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
240-213775-1	ZCSF-102424-001	Solid	10/20/24 14:45	10/25/24 09:30

Detection Summary

Client: CJF Associates, LLC
Job ID: 240-213775-1
Project/Site: Alter Council Bluffs Iowa 1216-01

Client Sample ID: ZCSF-102424-001
Lab Sample ID: 240-213775-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
PCB-1242	22		1.7	1.1	mg/Kg	5	☼	8082A	Total/NA
Total PCBs	22		1.7	1.1	mg/Kg	1		PCB	Total/NA
Barium	0.69		0.40	0.080	mg/L	2		6010D	TCLP
Cadmium	0.16		0.040	0.0078	mg/L	2		6010D	TCLP
Lead	0.076	J	0.20	0.074	mg/L	2		6010D	TCLP
Flashpoint	>201		65.0	65.0	Degrees F	1		D92	Total/NA

This Detection Summary does not include radiochemical test results.

Client: CJF Associates, LLC
Project/Site: Alter Council Bluffs Iowa 1216-01

Job ID: 240-213775-1

Client Sample ID: ZCSF-102424-001

Date Collected: 10/20/24 14:45
Date Received: 10/25/24 09:30

Lab Sample ID: 240-213775-1

Matrix: Solid

Method: SW846 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography - TCLP

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		1.8	0.75	ug/L		11/01/24 13:29	11/04/24 14:46	1
PCB-1221	ND		1.8	0.75	ug/L		11/01/24 13:29	11/04/24 14:46	1
PCB-1232	ND		1.8	0.75	ug/L		11/01/24 13:29	11/04/24 14:46	1
PCB-1242	ND		1.8	0.75	ug/L		11/01/24 13:29	11/04/24 14:46	1
PCB-1248	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 14:46	1
PCB-1254	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 14:46	1
PCB-1260	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 14:46	1
PCB-1268	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 14:46	1
Polychlorinated biphenyls, Total	ND		1.8	0.75	ug/L		11/01/24 13:29	11/04/24 14:46	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
DCB Decachlorobiphenyl (Surr)	*34*		*11 - 122*	*11/01/24 13:29*	*11/04/24 14:46*	*1*
Tetrachloro-m-xylene	*110*		*23 - 123*	*11/01/24 13:29*	*11/04/24 14:46*	*1*

Method: TAL SOP PCB - Total PCB Calculation

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Total PCBs	**22**		1.7	1.1	mg/Kg			11/15/24 02:46	1

Method: SW846 6010D - Metals (ICP) - TCLP

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	ND		0.20	0.060	mg/L		11/04/24 09:30	11/05/24 13:36	2
Barium	**0.69**		0.40	0.080	mg/L		11/04/24 09:30	11/05/24 13:36	2
Cadmium	**0.16**		0.040	0.0078	mg/L		11/04/24 09:30	11/05/24 13:36	2
Chromium	ND		0.040	0.012	mg/L		11/04/24 09:30	11/05/24 13:36	2
Lead	**0.076**	**J**	0.20	0.074	mg/L		11/04/24 09:30	11/05/24 13:36	2
Selenium	ND		0.20	0.058	mg/L		11/04/24 09:30	11/05/24 13:36	2
Silver	ND		0.10	0.032	mg/L		11/04/24 09:30	11/05/24 13:36	2

Method: SW846 7470A - Mercury (CVAA) - TCLP

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.0020	0.0011	mg/L		11/02/24 15:10	11/04/24 11:30	1

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Flashpoint (ASTM D92)	**>201**		65.0	65.0	Degrees F			11/09/24 14:25	1
Percent Moisture (EPA Moisture)	**11.2**		0.1	0.1	%			10/29/24 17:06	1
Percent Solids (EPA Moisture)	**88.8**		0.1	0.1	%			10/29/24 17:06	1

Client: CJF Associates, LLC
Project/Site: Alter Council Bluffs Iowa 1216-01

Job ID: 240-213775-1

Client Sample ID: ZCSF-102424-001
Date Collected: 10/20/24 14:45
Date Received: 10/25/24 09:30

Lab Sample ID: 240-213775-1
Matrix: Solid
Percent Solids: 88.8

Method: SW846 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		0.35	0.22	mg/Kg	☼	11/08/24 10:37	11/11/24 16:31	1
PCB-1221	ND		0.35	0.22	mg/Kg	☼	11/08/24 10:37	11/11/24 16:31	1
PCB-1232	ND		0.35	0.22	mg/Kg	☼	11/08/24 10:37	11/11/24 16:31	1
PCB-1242	**22**		1.7	1.1	mg/Kg	☼	11/08/24 10:37	11/15/24 02:46	5
PCB-1248	ND		0.35	0.30	mg/Kg	☼	11/08/24 10:37	11/11/24 16:31	1
PCB-1254	ND		0.35	0.30	mg/Kg	☼	11/08/24 10:37	11/11/24 16:31	1
PCB-1260	ND		0.35	0.30	mg/Kg	☼	11/08/24 10:37	11/11/24 16:31	1
PCB-1268	ND		0.35	0.30	mg/Kg	☼	11/08/24 10:37	11/11/24 16:31	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
DCB Decachlorobiphenyl (Surr)	*97*		*10 - 150*	*11/08/24 10:37*	*11/11/24 16:31*	*1*
Tetrachloro-m-xylene	*79*		*12 - 127*	*11/08/24 10:37*	*11/11/24 16:31*	*1*

Surrogate Summary

Client: CJF Associates, LLC
Job ID: 240-213775-1
Project/Site: Alter Council Bluffs Iowa 1216-01

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Matrix: Solid **Prep Type: Total/NA**

		Percent Surrogate Recovery (Acceptance Limits)	
		DCB1	TCX1
Lab Sample ID	Client Sample ID	(10-150)	(12-127)
240-213775-1	ZCSF-102424-001	97	79
LCS 310-439110/2-A	Lab Control Sample	95	96
MB 310-439110/1-A	Method Blank	95	94

Surrogate Legend

DCB = DCB Decachlorobiphenyl (Surr)
TCX = Tetrachloro-m-xylene

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Matrix: Solid **Prep Type: Total/NA**

		Percent Surrogate Recovery (Acceptance Limits)	
		DCB1	TCX1
Lab Sample ID	Client Sample ID	(11-122)	(23-123)
LCS 310-438428/9-A	Lab Control Sample	56	107
MB 310-438428/1-A	Method Blank	26	52

Surrogate Legend

DCB = DCB Decachlorobiphenyl (Surr)
TCX = Tetrachloro-m-xylene

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Matrix: Solid **Prep Type: TCLP**

		Percent Surrogate Recovery (Acceptance Limits)	
		DCB1	TCX1
Lab Sample ID	Client Sample ID	(11-122)	(23-123)
240-213775-1	ZCSF-102424-001	34	110
LB 310-438266/1-D	Method Blank	40	52

Surrogate Legend

DCB = DCB Decachlorobiphenyl (Surr)
TCX = Tetrachloro-m-xylene

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Lab Sample ID: MB 310-438428/1-A
Matrix: Solid
Analysis Batch: 438540

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 438428

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		1.8	0.75	ug/L		11/01/24 13:29	11/04/24 12:26	1
PCB-1221	ND		1.8	0.75	ug/L		11/01/24 13:29	11/04/24 12:26	1
PCB-1232	ND		1.8	0.75	ug/L		11/01/24 13:29	11/04/24 12:26	1
PCB-1242	ND		1.8	0.75	ug/L		11/01/24 13:29	11/04/24 12:26	1
PCB-1248	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 12:26	1
PCB-1254	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 12:26	1
PCB-1260	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 12:26	1
PCB-1268	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 12:26	1
Polychlorinated biphenyls, Total	ND		1.8	0.75	ug/L		11/01/24 13:29	11/04/24 12:26	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
DCB Decachlorobiphenyl (Surr)	*26*		*11 - 122*	*11/01/24 13:29*	*11/04/24 12:26*	*1*
Tetrachloro-m-xylene	*52*		*23 - 123*	*11/01/24 13:29*	*11/04/24 12:26*	*1*

Lab Sample ID: LCS 310-438428/9-A
Matrix: Solid
Analysis Batch: 438540

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 438428

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits		
PCB-1016			26.5	27.2		ug/L		103	30 - 133		
PCB-1260			26.5	26.0		ug/L		98	31 - 133		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
DCB Decachlorobiphenyl (Surr)	*56*		*11 - 122*
Tetrachloro-m-xylene	*107*		*23 - 123*

Lab Sample ID: MB 310-439110/1-A
Matrix: Solid
Analysis Batch: 439242

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 439110

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		0.047	0.030	mg/Kg		11/08/24 10:37	11/11/24 13:14	1
PCB-1221	ND		0.047	0.030	mg/Kg		11/08/24 10:37	11/11/24 13:14	1
PCB-1232	ND		0.047	0.030	mg/Kg		11/08/24 10:37	11/11/24 13:14	1
PCB-1242	ND		0.047	0.030	mg/Kg		11/08/24 10:37	11/11/24 13:14	1
PCB-1248	ND		0.047	0.041	mg/Kg		11/08/24 10:37	11/11/24 13:14	1
PCB-1254	ND		0.047	0.041	mg/Kg		11/08/24 10:37	11/11/24 13:14	1
PCB-1260	ND		0.047	0.041	mg/Kg		11/08/24 10:37	11/11/24 13:14	1
PCB-1268	ND		0.047	0.041	mg/Kg		11/08/24 10:37	11/11/24 13:14	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
DCB Decachlorobiphenyl (Surr)	*95*		*10 - 150*	*11/08/24 10:37*	*11/11/24 13:14*	*1*
Tetrachloro-m-xylene	*94*		*12 - 127*	*11/08/24 10:37*	*11/11/24 13:14*	*1*

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography (Continued)

Lab Sample ID: LCS 310-439110/2-A
Matrix: Solid
Analysis Batch: 439242

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 439110

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits		
PCB-1016			0.321	0.223		mg/Kg		70	35 - 128		
PCB-1260			0.321	0.212		mg/Kg		66	38 - 128		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
DCB Decachlorobiphenyl (Surr)	*95*		*10 - 150*
Tetrachloro-m-xylene	*96*		*12 - 127*

Lab Sample ID: LB 310-438266/1-D
Matrix: Solid
Analysis Batch: 438540

Client Sample ID: Method Blank
Prep Type: TCLP
Prep Batch: 438428

Analyte	LB Result	LB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		1.8	0.74	ug/L		11/01/24 13:29	11/04/24 13:12	1
PCB-1221	ND		1.8	0.74	ug/L		11/01/24 13:29	11/04/24 13:12	1
PCB-1232	ND		1.8	0.74	ug/L		11/01/24 13:29	11/04/24 13:12	1
PCB-1242	ND		1.8	0.74	ug/L		11/01/24 13:29	11/04/24 13:12	1
PCB-1248	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 13:12	1
PCB-1254	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 13:12	1
PCB-1260	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 13:12	1
PCB-1268	ND		1.8	0.63	ug/L		11/01/24 13:29	11/04/24 13:12	1
Polychlorinated biphenyls, Total	ND		1.8	0.74	ug/L		11/01/24 13:29	11/04/24 13:12	1

Surrogate	*LB %Recovery*	*LB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
DCB Decachlorobiphenyl (Surr)	*40*		*11 - 122*	*11/01/24 13:29*	*11/04/24 13:12*	*1*
Tetrachloro-m-xylene	*52*		*23 - 123*	*11/01/24 13:29*	*11/04/24 13:12*	*1*

Method: 6010D - Metals (ICP)

Lab Sample ID: LB 310-438266/1-B
Matrix: Solid
Analysis Batch: 438772

Client Sample ID: Method Blank
Prep Type: TCLP
Prep Batch: 438389

Analyte	LB Result	LB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	ND		0.10	0.030	mg/L		11/04/24 09:30	11/05/24 12:25	1
Barium	ND		0.20	0.040	mg/L		11/04/24 09:30	11/05/24 12:25	1
Cadmium	ND		0.020	0.0039	mg/L		11/04/24 09:30	11/05/24 12:25	1
Chromium	ND		0.020	0.0060	mg/L		11/04/24 09:30	11/05/24 12:25	1
Lead	ND		0.10	0.037	mg/L		11/04/24 09:30	11/05/24 12:25	1
Selenium	ND		0.10	0.029	mg/L		11/04/24 09:30	11/05/24 12:25	1
Silver	ND		0.050	0.016	mg/L		11/04/24 09:30	11/05/24 12:25	1

Lab Sample ID: LCS 310-438266/2-B
Matrix: Solid
Analysis Batch: 438772

Client Sample ID: Lab Control Sample
Prep Type: TCLP
Prep Batch: 438389

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits		
Arsenic			4.00	4.68		mg/L		117	80 - 120		
Barium			2.00	2.13		mg/L		107	80 - 120		

Method: 6010D - Metals (ICP) (Continued)

Lab Sample ID: LCS 310-438266/2-B
Matrix: Solid
Analysis Batch: 438772

Client Sample ID: Lab Control Sample
Prep Type: TCLP
Prep Batch: 438389

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Cadmium	2.00	2.17		mg/L		108	80 - 120
Chromium	2.00	2.22		mg/L		111	80 - 120
Lead	4.00	4.28		mg/L		107	80 - 120
Selenium	8.00	9.18		mg/L		115	80 - 120
Silver	2.00	2.20		mg/L		110	80 - 120

Method: 7470A - Mercury (CVAA)

Lab Sample ID: LB 310-438266/1-F
Matrix: Solid
Analysis Batch: 438610

Client Sample ID: Method Blank
Prep Type: TCLP
Prep Batch: 438436

Analyte	LB Result	LB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.0020	0.0011	mg/L		11/02/24 15:10	11/04/24 11:17	1

Lab Sample ID: LCS 310-438266/2-C
Matrix: Solid
Analysis Batch: 438610

Client Sample ID: Lab Control Sample
Prep Type: TCLP
Prep Batch: 438436

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Mercury	0.0167	0.0172		mg/L		103	80 - 120

Method: Moisture - Percent Moisture

Lab Sample ID: 240-213775-1 DU
Matrix: Solid
Analysis Batch: 437980

Client Sample ID: ZCSF-102424-001
Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	RPD Limit
Percent Moisture	11.2		15.4		%		32	40
Percent Solids	88.8		84.6		%		5	16

GC Semi VOA

Leach Batch: 438266

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	TCLP	Solid	1311	
LB 310-438266/1-D	Method Blank	TCLP	Solid	1311	

Prep Batch: 438428

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	TCLP	Solid	3511	438266
LB 310-438266/1-D	Method Blank	TCLP	Solid	3511	438266
MB 310-438428/1-A	Method Blank	Total/NA	Solid	3511	
LCS 310-438428/9-A	Lab Control Sample	Total/NA	Solid	3511	

Analysis Batch: 438540

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	TCLP	Solid	8082A	438428
LB 310-438266/1-D	Method Blank	TCLP	Solid	8082A	438428
MB 310-438428/1-A	Method Blank	Total/NA	Solid	8082A	438428
LCS 310-438428/9-A	Lab Control Sample	Total/NA	Solid	8082A	438428

Prep Batch: 439110

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	Total/NA	Solid	3546	
MB 310-439110/1-A	Method Blank	Total/NA	Solid	3546	
LCS 310-439110/2-A	Lab Control Sample	Total/NA	Solid	3546	

Analysis Batch: 439242

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	Total/NA	Solid	8082A	439110
MB 310-439110/1-A	Method Blank	Total/NA	Solid	8082A	439110
LCS 310-439110/2-A	Lab Control Sample	Total/NA	Solid	8082A	439110

Analysis Batch: 439774

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	Total/NA	Solid	8082A	439110

Analysis Batch: 440014

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	Total/NA	Solid	PCB	

Metals

Leach Batch: 438266

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	TCLP	Solid	1311	
LB 310-438266/1-B	Method Blank	TCLP	Solid	1311	
LB 310-438266/1-F	Method Blank	TCLP	Solid	1311	
LCS 310-438266/2-B	Lab Control Sample	TCLP	Solid	1311	
LCS 310-438266/2-C	Lab Control Sample	TCLP	Solid	1311	

Prep Batch: 438389

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	TCLP	Solid	3010A	438266
LB 310-438266/1-B	Method Blank	TCLP	Solid	3010A	438266

Metals (Continued)

Prep Batch: 438389 (Continued)

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
LCS 310-438266/2-B	Lab Control Sample	TCLP	Solid	3010A	438266

Prep Batch: 438436

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	TCLP	Solid	7470A	438266
LB 310-438266/1-F	Method Blank	TCLP	Solid	7470A	438266
LCS 310-438266/2-C	Lab Control Sample	TCLP	Solid	7470A	438266

Analysis Batch: 438610

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	TCLP	Solid	7470A	438436
LB 310-438266/1-F	Method Blank	TCLP	Solid	7470A	438436
LCS 310-438266/2-C	Lab Control Sample	TCLP	Solid	7470A	438436

Analysis Batch: 438772

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	TCLP	Solid	6010D	438389
LB 310-438266/1-B	Method Blank	TCLP	Solid	6010D	438389
LCS 310-438266/2-B	Lab Control Sample	TCLP	Solid	6010D	438389

General Chemistry

Analysis Batch: 437980

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	Total/NA	Solid	Moisture	
240-213775-1 DU	ZCSF-102424-001	Total/NA	Solid	Moisture	

Analysis Batch: 439199

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-213775-1	ZCSF-102424-001	Total/NA	Solid	D92	

Lab Chronicle

Client: CJF Associates, LLC
Project/Site: Alter Council Bluffs Iowa 1216-01

Job ID: 240-213775-1

Client Sample ID: ZCSF-102424-001

Lab Sample ID: 240-213775-1

Date Collected: 10/20/24 14:45

Matrix: Solid

Date Received: 10/25/24 09:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
TCLP	Leach	1311			438266	U8FK	EET CF	10/31/24 15:36 - 11/01/24 07:36 [1]
TCLP	Prep	3511			438428	AYK7	EET CF	11/01/24 13:29
TCLP	Analysis	8082A		1	438540	BW2O	EET CF	11/04/24 14:46
Total/NA	Analysis	PCB		1	440014	BW2O	EET CF	11/15/24 02:46
TCLP	Leach	1311			438266	U8FK	EET CF	10/31/24 15:36 - 11/01/24 07:36 [1]
TCLP	Prep	3010A			438389	F5MW	EET CF	11/04/24 09:30
TCLP	Analysis	6010D		2	438772	ZRI4	EET CF	11/05/24 13:36
TCLP	Leach	1311			438266	U8FK	EET CF	10/31/24 15:36 - 11/01/24 07:36 [1]
TCLP	Prep	7470A			438436	QTZ5	EET CF	11/02/24 15:10
TCLP	Analysis	7470A		1	438610	QTZ5	EET CF	11/04/24 11:30
Total/NA	Analysis	D92		1	439199	WZC8	EET CF	11/09/24 14:25
Total/NA	Analysis	Moisture		1	437980	T5AC	EET CF	10/29/24 17:06

Client Sample ID: ZCSF-102424-001

Lab Sample ID: 240-213775-1

Date Collected: 10/20/24 14:45

Matrix: Solid

Date Received: 10/25/24 09:30

Percent Solids: 88.8

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Prep	3546			439110	D2YP	EET CF	11/08/24 10:37
Total/NA	Analysis	8082A		1	439242	BW2O	EET CF	11/11/24 16:31
Total/NA	Prep	3546			439110	D2YP	EET CF	11/08/24 10:37
Total/NA	Analysis	8082A		5	439774	BW2O	EET CF	11/15/24 02:46

[1] This procedure uses a method stipulated length of time for the process. Both start and end times are displayed.

Laboratory References:

EET CF = Eurofins Cedar Falls, 3019 Venture Way, Cedar Falls, IA 50613, TEL (319)277-2401

Accreditation/Certification Summary

Client: CJF Associates, LLC
Job ID: 240-213775-1
Project/Site: Alter Council Bluffs Iowa 1216-01

Laboratory: Eurofins Cedar Falls

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	Identification Number	Expiration Date
Iowa	State	007	12-01-25

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

Analysis Method	Prep Method	Matrix	Analyte
8082A	3511	Solid	PCB-1268
8082A	3511	Solid	Polychlorinated biphenyls, Total
8082A	3546	Solid	PCB-1268
D92		Solid	Flashpoint
Moisture		Solid	Percent Moisture
Moisture		Solid	Percent Solids
PCB		Solid	Total PCBs

Eurofins Cleveland
180 S. Van Buren Avenue
Barberton, OH 44203
Phone (330) 497-9396 Phone (330) 497-0772

Chain of Custody Record

eurofins | Environment Testing

Client Information	Sampler: Charles Ring	Lab PM: Heckler, Denise D	Carrier Tracking No(s):	COC No:
Client Contact: Charles Ring	Phone: 248-227-5171	E-Mail: Denise.Heckler@et.eurofinsus.com	State of Origin:	Page: 1 of 1
Company: CJF Associates	PWSID:			Job #:
Address: 23210 Greater Mack Ave #174	Due Date Requested:			
City: St Clair Shores	TAT Requested (days):			
State, Zip: Michigan 48080	Compliance Project: Δ Yes Δ No			
Phone: 248-227-5171	PO #:			
Email: cring@cjfassociates.com	WO #:			
Project Name: Alter ZC	Project #: 1216-01			
Site: Council Bluffs, Iowa	SSOW#:			

Analysis Requested

Preservation Codes:
A - HCL
B - NaOH
C - Zn Acetate
D - Nitric Acid
E - NaHSO4
F - MeOH
G - Amchlor
H - Ascorbic Acid
I - Ice
J - DI Water
K - EDTA
L - EDA
M - Hexane
N - None
O - AsNaO2
P - Na2O4S
Q - Na2SO3
R - Na2S2O3
S - H2SO4
T - TSP Dodecahydrate
U - Acetone
V - MCAA
W - pH 4-5
Y - Trizma
Z - other (specify)
Other:

Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=grab)	Matrix (W=water, S=solid, O=waste/oil, BT=Tissue, A=Air)	Field Filtered Sample (Yes or No)	Perform MS/MSD	Total PCBs	TCLPCBs	TCLP RCRA Metals	Ignitability	Total Number of containers	Special Instructions/Note:
			Preservation Code:									
ZCSF-102424-001	10-24-24	2:45	C	S			X	X	X	X		
↓ -001 DUP	↓	↓	↓	↓								hold

240-213775 COC

Possible Hazard Identification	Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown ☐ Radiological	☐ Return To Client ☐ Disposal By Lab ☐ Archive For _____ Months
Deliverable Requested: I, II, III, IV, Other (specify)	Special Instructions/QC Requirements: Sample needs Iowa certification

Empty Kit Relinquished by:	Date:	Time:	Method of Shipment:

	Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
1	[signature]	10-24-24 4:00 PM	CJF	KATHARINE MARTIN	10/25/24 930	EUR
2	Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
3	Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company

Custody Seals Intact: Δ Yes Δ No	Custody Seal No.:	Cooler Temperature(s) °C and Other Remarks:

Ver: 01/16/2019

Eurofins – Cleveland Sample Receipt Form/Narrative **Login # :**
Barberton Facility

Client CJF Associates Site Name

Cooler unpacked by: ICM

Cooler Received on 10/25/24 Opened on 10/26/24

FedEx: 1st Grd (Exp) UPS FAS Waypoint Client Drop Off Eurofins Courier Other

Receipt After-hours Drop-off Date/Time Storage Location

Eurofins Cooler # EC Foam Box Client Cooler Box Other

Packing material used. (Bubble Wrap) Foam Plastic Bag None Other

COOLANT: (Wet Ice) Blue Ice Dry Ice Water None

1 Cooler temperature upon receipt ☐ See Multiple Cooler Form

IR GUN # 17 (CF +0.1 °C) Observed Cooler Temp. 2.4 °C Corrected Cooler Temp. 2.5 °C

2. Were tamper/custody seals on the outside of the cooler(s)? If Yes Quantity 1	(Yes)	No
-Were the seals on the outside of the cooler(s) signed & dated?	(Yes)	No NA
-Were tamper/custody seals on the bottle(s) or bottle kits (LLHg/MeHg)?	Yes	(No)
-Were tamper/custody seals intact and uncompromised?	(Yes)	No NA
3 Shippers' packing slip attached to the cooler(s)?	(Yes)	No
4. Did custody papers accompany the sample(s)?	(Yes)	No
5 Were the custody papers relinquished & signed in the appropriate place?	(Yes)	No
6 Was/were the person(s) who collected the samples clearly identified on the COC?	(Yes)	No
7 Did all bottles arrive in good condition (Unbroken)?	(Yes)	No
8. Could all bottle labels (ID/Date/Time) be reconciled with the COC?	(Yes)	No
9 For each sample, does the COC specify preservatives (Y/N), # of containers (Y/N), and sample type of grab/comp (Y/N)?		
10 Were correct bottle(s) used for the test(s) indicated?	(Yes)	No
11 Sufficient quantity received to perform indicated analyses?	(Yes)	No
12. Are these work share samples and all listed on the COC?	Yes	(No)
If yes, Questions 13-17 have been checked at the originating laboratory		
13 Were all preserved sample(s) at the correct pH upon receipt?	Yes	No (NA) pH Strip Lot# HC447997
14. Were VOAs on the COC?	Yes	(No)
15 Were air bubbles >6 mm in any VOA vials? ● ⬅ Larger than this.	Yes	No (NA)
16 Was a VOA trip blank present in the cooler(s)? Trip Blank Lot #	Yes	(No)
17 Was a LL Hg or Me Hg trip blank present?	Yes	(No)

Tests that are not checked for pH by Receiving:

VOAs
Oil and Grease
TOC

Contacted PM Date by via Verbal Voice Mail Other

Concerning

18. CHAIN OF CUSTODY & SAMPLE DISCREPANCIES ☐ additional next page

Samples processed by:

19. SAMPLE CONDITION

Sample(s) were received after the recommended holding time had expired.

Sample(s) were received in a broken container

Sample(s) were received with bubble >6 mm in diameter (Notify PM)

20. SAMPLE PRESERVATION

Sample(s) were further preserved in the laboratory

Time preserved. Preservative(s) added/Lot number(s)

VOA Sample Preservation - Date/Time VOAs Frozen.

10/26/2024

Login Container Summary Report

240-213775

11/18/2024

Temperature readings _____

Client Sample ID	Lab ID	Container Type	Container pH	Container Temp	Preservation Added	Preservation Lot Number
ZCSF-102424-001	240-213775-A-1	Soil jar 4oz - clear glass				
ZCSF-102424-001	240-213775-B-1	Soil jar 4oz - clear glass				
ZCSF-102424-001	240-213775-C-1	Soil jar 16oz - clear glass				
ZCSF-102424-001	240-213775-D-1	Soil jar 16oz - clear glass				
ZCSF-102424-001 DUP	240-213775-A-2	Soil jar 4oz - clear glass				
ZCSF-102424-001 DUP	240-213775-B-2	Soil jar 4oz - clear glass				
ZCSF-102424-001 DUP	240-213775-C-2	Soil jar 16oz - clear glass				
ZCSF-102424-001 DUP	240-213775-D-2	Soil jar 16oz - clear glass				

eurofins | Environment Testing America

240-213775 Chain of Custody

Cooler/Sample Receipt and Temperature Log Form

Client Information

Client: Eurofins Cleveland

City/State: CITY | STATE | Project:

Receipt Information

Date/Time Received: DATE 10/29/24 | TIME 850 | Received By: PH

Delivery Type: ☐ UPS ☑ FedEx ☐ FedEx Ground ☐ US Mail ☐ Spee-Dee ☐ Lab Courier ☐ Lab Field Services ☐ Client Drop-off ☐ Other:_____

Condition of Cooler/Containers

Sample(s) received in Cooler? ☑ Yes ☐ No *If yes:* Cooler ID:

Multiple Coolers? ☐ Yes ☐ No *If yes:* Cooler # _____ of _____

Cooler Custody Seals Present? ☐ Yes ☑ No *If yes:* Cooler custody seals intact? ☐ Yes ☐ No

Sample Custody Seals Present? ☐ Yes ☑ No *If yes:* Sample custody seals intact? ☐ Yes ☐ No

Trip Blank Present? ☐ Yes ☑ No *If yes:* Which VOA samples are in cooler? ↓

Temperature Record

Coolant: ☑ Wet ice ☐ Blue ice ☐ Dry ice ☐ Other:_____ ☐ NONE

Thermometer ID: P | Correction Factor (°C): 0

Temp Blank Temperature – If no temp blank, or temp blank temperature above criteria, proceed to Sample Container Temperature

Uncorrected Temp (°C): 3.6 | Corrected Temp (°C): 3.6

Sample Container Temperature

	CONTAINER 1	CONTAINER 2
Container(s) used:		
Uncorrected Temp (°C):		
Corrected Temp (°C):		

Exceptions Noted

1) If temperature exceeds criteria, was sample(s) received same day of sampling? ☐ Yes ☐ No
   a) *If yes:* Is there evidence that the chilling process began? ☐ Yes ☐ No

2) If temperature is <0°C, are there obvious signs that the integrity of sample containers is compromised? (e.g., bulging septa, broken/cracked bottles, frozen solid?) ☐ Yes ☐ No

NOTE: If yes, contact PM before proceeding. If no, proceed with login

Additional Comments

Eurofins Cleveland
180 S. Van Buren Avenue
Barberton, OH 44203
Phone. 330-497-9396 Fax: 330-497-0772

Chain of Custody Record

eurofins | Environment Testing

Client Information (Sub Contract Lab)	Sampler: N/A	Lab PM: Heckler, Denise D	Carrier Tracking No(s): N/A	COC No: 240-192897 1
Client Contact: Shipping/Receiving	Phone: N/A	E-Mail: Denise.Heckler@et.eurofinsus com	State of Origin: Iowa	Page: Page 1 of 1
Company: Eurofins Environment Testing North Centr		Accreditations Required (See note): State - Iowa		Job #: 240-213775-1
Address: 3019 Venture Way, ,	Due Date Requested: 11/11/2024			Preservation Codes: -
City: Cedar Falls	TAT Requested (days): N/A			
State, Zip: IA, 50613				
Phone: 319-277-2401(Tel) 319-277-2425(Fax)	PO #: N/A			
Email: N/A	WO #: N/A			
Project Name: Alter Council Bluffs Iowa 1216-01	Project #: 24013819			
Site: N/A	SSOW#: N/A			Other: N/A

Analysis Requested

Sample Identification - Client ID (Lab ID)	Sample Date	Sample Time	Sample Type (C=comp, G=grab)	Matrix (W=water S=solid, O=waste/oil, BT=Tissue, A=Air)	Field Filtered Sample (Yes or No)	Perform MS/MSD (Yes or No)	Moisture/ Percent Moisture	7470A/1311T_Hg Mercury TCLP	D92/ Flashpoint	8082A/3550B_PCB_1YR PCBs	Total_PCB/ Total PCBs	6010D/1311T_M TCLP Metals	8082A/1311_T PCBs	Total Number of containers	Special Instructions/Note:
			Preservation Code:												
ZCSF-102424-001 (240-213775-1)	10/20/24	14 45 Central	G	Solid			X	X	X	X	X	X	X	4	
ZCSF-102424-001 DUP (240-213775-2)	10/20/24	14.45 Central	G	Solid			X							4	

Note: Since laboratory accreditations are subject to change, Eurofins Environment Testing North Central, LLC places the ownership of method, analyte & accreditation compliance upon our subcontract laboratories. This sample shipment is forwarded under chain-of-custody If the laboratory does not currently maintain accreditation in the State of Origin listed above for analysis/tests/matrix being analyzed, the samples must be shipped back to the Eurofins Environment Testing North Central, LLC laboratory or other instructions will be provided. Any changes to accreditation status should be brought to Eurofins Environment Testing North Central, LLC attention immediately If all requested accreditations are current to date, return the signed Chain of Custody attesting to said compliance to Eurofins Environment Testing North Central, LLC.

Possible Hazard Identification *Unconfirmed*	***Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)*** ☐ *Return To Client* ☐ *Disposal By Lab* ☐ *Archive For* _____ *Months*
Deliverable Requested: I, II, III, IV, Other (specify) Primary Deliverable Rank: 2	Special Instructions/QC Requirements.

Empty Kit Relinquished by:	Date:	Time:	Method of Shipment:

	Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
	MALISSA LOAR	10-28-24			10/29/24 830	
	Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
	Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company

Custody Seals Intact: Δ Yes Δ No	Custody Seal No	Cooler Temperature(s) °C and Other Remarks.

Ver: 10/10/2024

Login Sample Receipt Checklist

Client: CJF Associates, LLC

Job Number: 240-213775-1

Login Number: 213775
List Number: 2
Creator: Hirsch, Preston

List Source: Eurofins Cedar Falls
List Creation: 10/29/24 10:23 AM

Question	Answer	Comment
Radioactivity wasn't checked or is </= background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	