



**IOWA DEPARTMENT OF NATURAL RESOURCES**  
**REQUEST FOR SPECIAL WASTE**  
**AUTHORIZATION**



Check one of the following:     **New Application**     **Renewal, Existing SWA # \_\_\_\_\_**

The intent of a special waste authorization is to provide safe and proper management for disposal of wastes which present a threat to human health or the environment or a waste with inherent properties which make the disposal of the waste in a sanitary landfill difficult to manage. It is each landfill's responsibility to inform the waste generator if a waste should be handled as a special waste and to ensure that special wastes delivered to the landfill conform to the Special Waste Acceptance Criteria (SWAC) on file with the Department. It is the Department's responsibility to review each application for a special waste authorization to verify that the proposed waste can be landfilled under the current regulations in Iowa.

**READ THE FOLLOWING INSTRUCTIONS BEFORE COMPLETING THIS APPLICATION**

**Waste Generator:**

1. Complete Sections 1-3 of this application applicable to the waste characterization and disposal information.
2. Attach Toxicity Characteristic Leaching Procedure (TCLP) test results, material safety data sheet(s) (MSDS), or evidence of "processor knowledge" when appropriate that demonstrates the waste is not considered a characteristic hazardous waste exhibiting the properties of flammability, corrosivity, reactivity or toxicity or a listed hazardous waste as defined in 40 CFR Part 261, Subpart D.
3. Provide signature in Section 3 to verify that the information provided is true, accurate and complete.
4. Mail or deliver (2) copies of the completed application with attachments to the requested disposal destination (*must be a landfill that is authorized to accept waste from the service area of where the waste was generated*). Please contact Sue Johnson at (515) 281-7982 for a list of landfills authorized to accept waste from the service area in which your facility is located.

**Receiving Landfill:**

Prior review of this application by the receiving landfill allows the department to more quickly process and evaluate the application.

1. Complete Section 5 of this application applicable to the landfill.
2. Indicate by signing the application that the landfill is willing to accept the waste if a Special Waste Authorization is issued by the department and if instructions for disposal of the waste, as contained in the landfill's SWAC, are followed by the generator.
3. Attach SWAC procedures for disposal of the waste.
4. Keep 1 copy for your records and submit the remaining one copy of the completed application with attachments (TCLP, MSDS, SWAC, etc.) to the department at the following address:

Iowa Department of Natural Resources  
 Land Quality Bureau- Attn: Susan Johnson  
 502 East 9<sup>th</sup> Street  
 Des Moines, IA 50319-0034

Applications will be considered incomplete if not signed by both the waste generator and receiving landfill. The receiving landfill must attach a copy of the SWAC for the particular waste for which the application has been submitted.

Written notification of approval or rejection will be mailed or faxed to the generator and landfill. If approved, a copy of the authorization must accompany the waste hauler to the landfill.

For questions concerning this application contact Sue Johnson at (515) 281-7982 or [susan.johnson@dnr.state.ia.us](mailto:susan.johnson@dnr.state.ia.us).

**SECTION 1: WASTE GENERATOR INFORMATION**

**MPC Sample # MW7606**

Name of Primary Contact\* Mike McNulty Title Environmental Manager  
*\*SWA approvals will be sent to this person at the address provided below.*

Company Name ITC Midwest - Karma

Mailing Address 27175 Energy Way

City Novi State MI Zip Code 48377

Telephone # 248-946-3392 Fax # 248-946-3378

Address or location of the point of generation of the waste, if different from the company address:

Address ITCM Karma Substation, 21238 240th Street

City Grand Junction State IA Zip Code 50107 (Greene County)

**All disposal shall be billed to MPC Environmental**

**8631 W. Jefferson Ave.**

**Detroit, MI 48209 313-849-2333**

**SECTION 2: WASTE CHARACTERIZATION**

Waste determined to be hazardous may not be landfilled in Iowa. Attach TCLP analysis that demonstrates the waste is not considered hazardous. For raw or virgin materials being disposed of, a MSDS that indicates the waste is not hazardous may be submitted in lieu of a TCLP analysis.

The generator may also apply knowledge of the hazardous characteristic(s) of the waste in light of the materials or the processes used ("knowledge of process"). In order to use knowledge to characterize the waste, the knowledge that is applied must be valid and verifiable and the generator must be able to demonstrate the basis for their claim by providing supporting information to justify that conclusion.

**Name and description of waste:**

Soil generated from construction activities at an electrical substation.

Because of the former use of this site as an electrical substation, this site has historic low PCB contamination (<1 ppm PCB) and cannot attribute the contamination to any particular source. Any PCBs detected in the waste (soil) covered by this special waste authorization resulted from a spill or release of oil containing some level of PCBs that occurred prior to February 17, 1978, and the actual PCB concentration of the waste is less than 50 ppm.

See MPC Sample # MW7606.

**Has any pretreatment been utilized? If so, please describe the pretreatment process:**

No

**List the alternatives to disposal that were analyzed and reason not utilized (attach extra sheets if necessary):**

Per ITC Policy - all soil from within substation fence lines must be disposed at a landfill. If soil exceeds total petroleum hydrocarbon criteria, ITC understands the soil may need to be land farmed at the landfill prior to landfill disposal. ITC Policy prohibits soil from electrical substations to be used for any beneficial re-use.

**SECTION 2: WASTE CHARACTERIZATION (Continued)**

Physical state at room temperature? <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Semi-Solid <input type="checkbox"/> Liquid	Percent (%) Solid: 100	pH: n/a	Flashpoint: n/a
Does this waste pass the paint filter liquids test?  Free liquids are prohibited from landfill disposal. Free liquids are defined as the liquid produced when a 100-millimeter or 100-gram representative sample is placed on a standard mesh number 60 (fine mesh size) conical paint filter for five minutes.			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is this waste a listed hazardous waste as identified in 40 CFR 261, Subpart D? Refer to the following web link to find listed hazardous wastes: <a href="http://www.gpoaccess.gov/cfr/index.html">http://www.gpoaccess.gov/cfr/index.html</a>			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does this waste exhibit the property of <i>ignitability</i> as defined in 40 CFR 261, Subpart C?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does this waste exhibit the property of <i>corrosivity</i> as defined in 40 CFR 261, Subpart C?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does this waste exhibit the property of <i>reactivity</i> as defined in 40 CFR 261, Subpart C?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does this waste exhibit the property of <i>toxicity</i> as defined in 40 CFR 261, Subpart C?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**SECTION 3: WASTE DISPOSAL INFORMATION**

Indicate the proposed disposal location and if this is a request for an on going disposal of a special waste or a one-time disposal. If on going, indicate the approximate amount in pounds to be disposed of quarterly.

Landfill Name\* Boone County Landfill

\*List only a landfill that is authorized to accept waste from the service area of where the waste was generated. Sue Johnson at (515) 281-7982 or [susan.johnson@dnr.state.ia.us](mailto:susan.johnson@dnr.state.ia.us) for a list of landfills authorized to accept waste from your facility.

On going (or intermittent) with an average disposal rate per quarter of \_\_\_\_\_ pounds

Indicate the amount on hand to be disposed of immediately: \_\_\_\_\_ pounds

One time only, with an estimated quantity of 90 tons ~~XXXXX~~ pounds

**SECTION 4: WASTE GENERATOR CERTIFICATION**

“ I certify under penalty of law (§455B.417.1(c), Code of Iowa) that I have examined and am familiar with the information submitted in this document concerning hazardous waste, and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. ”

**Applicant Signature:** Fenelon Ashley **Date:** 12/23/2024  
**Printed Name:** Fenelon Ashley, Agent for ITC, on behalf of MPC **Title:** MPC Compliance Department

**SECTION 5: LANDFILL INFORMATION**

The following section is to be completed by the receiving landfill. By signing below, the landfill verifies that the application has been examined and if approved by the department, is willing to accept the waste described within, provided that instructions for disposal of the waste, as contained in the landfill’s Special Waste Acceptance Criteria, are followed by the generator.

Prior review of this application by the receiving landfill will allow the department to more quickly process and evaluate the application. Please address the following:

**Indicate the properties that lead you to believe this is a special waste:**

This material does not meet the definition of typical MSW or C&D waste.

**Indicate any special handling procedures that the waste generator must follow prior to delivery at the landfill:**

Contact the office at 515-433-0591 prior to hauling.  
Hauler must provide a copy of the approved SWA upon arrival.

**Name of Responsible Official\*:** John Roosa  
*\*SWA approvals will be sent to this person at the address given below.*

**Solid Waste Agency Name** Boone County Landfill

**Mailing Address** 1268 224th Lane

**City** Boone **State** Iowa **Zip Code** 50036

**Telephone #** 515-433-0591 **Fax #** jroosa@iastate.edu

**Responsible Official Signature:** John Roosa

Digitally signed by John Roosa  
DN: cn=John Roosa, o=Landfill, ou=Boone County,  
email=jroosa@boonecounty.iowa.gov, c=US  
Date: 2025.01.14 08:22:52 -06'00'



# ANALYTICAL REPORT

## PREPARED FOR

Attn: Roland Newton  
Marine Pollution Control Corp  
8631 W Jefferson Avenue  
Detroit, Michigan 48209-2691

Generated 11/26/2024 2:34:55 PM

## JOB DESCRIPTION

Karma

## JOB NUMBER

310-295031-1

# Eurofins Cedar Falls

## 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.

This report was automatically generated by Eurofins Cedar Falls LIMS system, after peer review by each individual department. If you notice any issues please contact your project manager or call the lab at 319-277-2401.

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  
Samuel Miller, Project Management Assistant I  
[Samuel.Miller@et.eurofinsus.com](mailto:Samuel.Miller@et.eurofinsus.com)  
(319)277-2401



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# Case Narrative

Client: Marine Pollution Control Corp  
Project: Karma

Job ID: 310-295031-1

**Job ID: 310-295031-1**

**Eurofins Cedar Falls**

## Job Narrative 310-295031-1

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable.

- Matrix QC may not be reported if insufficient sample is provided or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

### Receipt

The sample was received on 11/12/2024 3:05 PM. Unless otherwise noted below, the sample arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 6.7°C.

### Hydrocarbons

Method OA1: The surrogate recovery for the LCS associated with preparation batch 310-439703 and analytical batch 310-439738 was outside the upper control limits.

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

### Diesel Range Organics

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

### PCBs

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

### Metals

Method 6010D - TCLP: The following sample(s) was diluted due to the presence of an interferent. MW 7606 (310-295031-1). Elevated reporting limits (RLs) are provided.

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

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# Sample Summary

Client: Marine Pollution Control Corp  
Project/Site: Karma

Job ID: 310-295031-1

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Lab Sample ID	Client Sample ID	Matrix	Collected	Received
310-295031-1	MW 7606	Solid	11/12/24 12:40	11/12/24 15:05

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

# Detection Summary

Client: Marine Pollution Control Corp  
Project/Site: Karma

Job ID: 310-295031-1

**Client Sample ID: MW 7606**

**Lab Sample ID: 310-295031-1**

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Barium	4.31		0.600		mg/L	3		6010D	TCLP

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15

This Detection Summary does not include radiochemical test results.

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# Client Sample Results

Client: Marine Pollution Control Corp  
Project/Site: Karma

Job ID: 310-295031-1

**Client Sample ID: MW 7606**

**Lab Sample ID: 310-295031-1**

Date Collected: 11/12/24 12:40

Matrix: Solid

Date Received: 11/12/24 15:05

**Method: Iowa DNR OA-1 (GC) - Volatile Petroleum Hydrocarbons (GC)**

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<0.0920		0.0920		mg/Kg		11/14/24 10:18	11/15/24 11:54	1
Toluene	<0.0920		0.0920		mg/Kg		11/14/24 10:18	11/15/24 11:54	1
Ethylbenzene	<0.0920		0.0920		mg/Kg		11/14/24 10:18	11/15/24 11:54	1
Xylenes, Total	<0.276		0.276		mg/Kg		11/14/24 10:18	11/15/24 11:54	1
<b>Surrogate</b>	<b>%Recovery</b>	<b>Qualifier</b>	<b>Limits</b>				<b>Prepared</b>	<b>Analyzed</b>	<b>Dil Fac</b>
4-Bromofluorobenzene (Surr)	113		50 - 150				11/14/24 10:18	11/15/24 11:54	1

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	<0.0487		0.0487		mg/Kg		11/20/24 08:23	11/21/24 01:07	1
PCB-1221	<0.0487		0.0487		mg/Kg		11/20/24 08:23	11/21/24 01:07	1
PCB-1232	<0.0487		0.0487		mg/Kg		11/20/24 08:23	11/21/24 01:07	1
PCB-1242	<0.0487		0.0487		mg/Kg		11/20/24 08:23	11/21/24 01:07	1
PCB-1248	<0.0487		0.0487		mg/Kg		11/20/24 08:23	11/21/24 01:07	1
PCB-1254	<0.0487		0.0487		mg/Kg		11/20/24 08:23	11/21/24 01:07	1
PCB-1260	<0.0487		0.0487		mg/Kg		11/20/24 08:23	11/21/24 01:07	1
PCB-1268	<0.0487		0.0487		mg/Kg		11/20/24 08:23	11/21/24 01:07	1
<b>Surrogate</b>	<b>%Recovery</b>	<b>Qualifier</b>	<b>Limits</b>				<b>Prepared</b>	<b>Analyzed</b>	<b>Dil Fac</b>
DCB Decachlorobiphenyl (Surr)	124		10 - 150				11/20/24 08:23	11/21/24 01:07	1
Tetrachloro-m-xylene (Surr)	124		12 - 127				11/20/24 08:23	11/21/24 01:07	1

**Method: Iowa DNR OA-2 - Iowa - Extractable Petroleum Hydrocarbons (GC)**

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Gasoline	<9.73		9.73		mg/Kg		11/14/24 08:03	11/20/24 09:26	1
Diesel	<9.73		9.73		mg/Kg		11/14/24 08:03	11/20/24 09:26	1
Waste Oil	<9.73		9.73		mg/Kg		11/14/24 08:03	11/20/24 09:26	1
Total Extractable Hydrocarbons	<14.6		14.6		mg/Kg		11/14/24 08:03	11/20/24 09:26	1
<b>Surrogate</b>	<b>%Recovery</b>	<b>Qualifier</b>	<b>Limits</b>				<b>Prepared</b>	<b>Analyzed</b>	<b>Dil Fac</b>
n-Octacosane	89		12 - 150				11/14/24 08:03	11/20/24 09:26	1

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	<0.300		0.300		mg/L		11/18/24 09:30	11/26/24 13:29	3
Barium	4.31		0.600		mg/L		11/18/24 09:30	11/26/24 13:29	3
Cadmium	<0.0600		0.0600		mg/L		11/18/24 09:30	11/26/24 13:29	3
Chromium	<0.0600		0.0600		mg/L		11/18/24 09:30	11/26/24 13:29	3
Lead	<0.300		0.300		mg/L		11/18/24 09:30	11/26/24 13:29	3
Selenium	<0.300		0.300		mg/L		11/18/24 09:30	11/26/24 13:29	3
Silver	<0.150		0.150		mg/L		11/18/24 09:30	11/26/24 13:29	3

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	<0.00200		0.00200		mg/L		11/15/24 11:23	11/18/24 12:35	1

# Definitions/Glossary

Client: Marine Pollution Control Corp  
Project/Site: Karma

Job ID: 310-295031-1

## Qualifiers

### GC VOA

Qualifier	Qualifier Description
S1+	Surrogate recovery exceeds control limits, high biased.

## 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

# Surrogate Summary

Client: Marine Pollution Control Corp  
Project/Site: Karma

Job ID: 310-295031-1

## Method: OA-1 (GC) - Volatile Petroleum Hydrocarbons (GC)

Matrix: Solid

Prep Type: Total/NA

### Percent Surrogate Recovery (Acceptance Limits)

Lab Sample ID	Client Sample ID	BFB (50-150)
310-295031-1	MW 7606	113
LCS 310-439703/2-A	Lab Control Sample	107
LCS 310-439703/3-A	Lab Control Sample	265 S1+
MB 310-439703/1-A	Method Blank	117

#### Surrogate Legend

BFB = 4-Bromofluorobenzene (Surr)

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

Matrix: Solid

Prep Type: Total/NA

### Percent Surrogate Recovery (Acceptance Limits)

Lab Sample ID	Client Sample ID	DCB1 (10-150)	TCX1 (12-127)
310-295031-1	MW 7606	124	124
LCS 310-440317/2-A	Lab Control Sample	117	120
MB 310-440317/1-A	Method Blank	85	88

#### Surrogate Legend

DCB = DCB Decachlorobiphenyl (Surr)

TCX = Tetrachloro-m-xylene (Surr)

## Method: OA-2 - Iowa - Extractable Petroleum Hydrocarbons (GC)

Matrix: Solid

Prep Type: Total/NA

### Percent Surrogate Recovery (Acceptance Limits)

Lab Sample ID	Client Sample ID	OTCN (12-150)
310-295031-1	MW 7606	89

#### Surrogate Legend

OTCN = n-Octacosane

# QC Sample Results

Client: Marine Pollution Control Corp  
Project/Site: Karma

Job ID: 310-295031-1

## Method: OA-1 (GC) - Volatile Petroleum Hydrocarbons (GC)

**Lab Sample ID: MB 310-439703/1-A**  
**Matrix: Solid**  
**Analysis Batch: 439738**

**Client Sample ID: Method Blank**  
**Prep Type: Total/NA**  
**Prep Batch: 439703**

Analyte	MB	MB	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Benzene	<0.0953		0.0953		mg/Kg		11/14/24 10:18	11/15/24 08:26	1
Toluene	<0.0953		0.0953		mg/Kg		11/14/24 10:18	11/15/24 08:26	1
Ethylbenzene	<0.0953		0.0953		mg/Kg		11/14/24 10:18	11/15/24 08:26	1
Xylenes, Total	<0.286		0.286		mg/Kg		11/14/24 10:18	11/15/24 08:26	1

Surrogate	MB	MB	Limits	Prepared	Analyzed	Dil Fac
	%Recovery	Qualifier				
4-Bromofluorobenzene (Surr)	117		50 - 150	11/14/24 10:18	11/15/24 08:26	1

**Lab Sample ID: LCS 310-439703/2-A**  
**Matrix: Solid**  
**Analysis Batch: 439738**

**Client Sample ID: Lab Control Sample**  
**Prep Type: Total/NA**  
**Prep Batch: 439703**

Analyte	Spike Added	LCS	LCS	Unit	D	%Rec	%Rec Limits
		Result	Qualifier				
Benzene	1.83	1.816		mg/Kg		99	71 - 134
Toluene	1.83	1.867		mg/Kg		102	72 - 135
Ethylbenzene	1.83	1.898		mg/Kg		104	72 - 135
Xylenes, Total	5.50	5.797		mg/Kg		105	70 - 139

Surrogate	LCS	LCS	Limits
	%Recovery	Qualifier	
4-Bromofluorobenzene (Surr)	107		50 - 150

**Lab Sample ID: LCS 310-439703/3-A**  
**Matrix: Solid**  
**Analysis Batch: 439738**

**Client Sample ID: Lab Control Sample**  
**Prep Type: Total/NA**  
**Prep Batch: 439703**

Surrogate	LCS	LCS	Limits
	%Recovery	Qualifier	
4-Bromofluorobenzene (Surr)	265	S1+	50 - 150

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

**Lab Sample ID: MB 310-440317/1-A**  
**Matrix: Solid**  
**Analysis Batch: 440404**

**Client Sample ID: Method Blank**  
**Prep Type: Total/NA**  
**Prep Batch: 440317**

Analyte	MB	MB	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
PCB-1016	<0.0472		0.0472		mg/Kg		11/20/24 08:23	11/20/24 21:26	1
PCB-1221	<0.0472		0.0472		mg/Kg		11/20/24 08:23	11/20/24 21:26	1
PCB-1232	<0.0472		0.0472		mg/Kg		11/20/24 08:23	11/20/24 21:26	1
PCB-1242	<0.0472		0.0472		mg/Kg		11/20/24 08:23	11/20/24 21:26	1
PCB-1248	<0.0472		0.0472		mg/Kg		11/20/24 08:23	11/20/24 21:26	1
PCB-1254	<0.0472		0.0472		mg/Kg		11/20/24 08:23	11/20/24 21:26	1
PCB-1260	<0.0472		0.0472		mg/Kg		11/20/24 08:23	11/20/24 21:26	1
PCB-1268	<0.0472		0.0472		mg/Kg		11/20/24 08:23	11/20/24 21:26	1

Surrogate	MB	MB	Limits	Prepared	Analyzed	Dil Fac
	%Recovery	Qualifier				
DCB Decachlorobiphenyl (Surr)	85		10 - 150	11/20/24 08:23	11/20/24 21:26	1
Tetrachloro-m-xylene (Surr)	88		12 - 127	11/20/24 08:23	11/20/24 21:26	1

Eurofins Cedar Falls

# QC Sample Results

Client: Marine Pollution Control Corp  
Project/Site: Karma

Job ID: 310-295031-1

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

Lab Sample ID: LCS 310-440317/2-A  
Matrix: Solid  
Analysis Batch: 440404

Client Sample ID: Lab Control Sample  
Prep Type: Total/NA  
Prep Batch: 440317

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits	
PCB-1016	0.314	0.2862		mg/Kg		91	35 - 128	
PCB-1260	0.314	0.2981		mg/Kg		95	38 - 128	
		LCS LCS						
Surrogate	%Recovery	Qualifier	Limits					
DCB Decachlorobiphenyl (Surr)	117		10 - 150					
Tetrachloro-m-xylene (Surr)	120		12 - 127					

## Method: 6010D - Metals (ICP)

Lab Sample ID: LB 310-439742/1-B  
Matrix: Solid  
Analysis Batch: 441028

Client Sample ID: Method Blank  
Prep Type: TCLP  
Prep Batch: 439878

Analyte	LB LB		RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Arsenic	<0.100		0.100		mg/L		11/18/24 09:30	11/26/24 13:21	1
Barium	<0.200		0.200		mg/L		11/18/24 09:30	11/26/24 13:21	1
Cadmium	<0.0200		0.0200		mg/L		11/18/24 09:30	11/26/24 13:21	1
Chromium	<0.0200		0.0200		mg/L		11/18/24 09:30	11/26/24 13:21	1
Lead	<0.100		0.100		mg/L		11/18/24 09:30	11/26/24 13:21	1
Selenium	<0.100		0.100		mg/L		11/18/24 09:30	11/26/24 13:21	1
Silver	<0.0500		0.0500		mg/L		11/18/24 09:30	11/26/24 13:21	1

Lab Sample ID: LCS 310-439742/2-B  
Matrix: Solid  
Analysis Batch: 441028

Client Sample ID: Lab Control Sample  
Prep Type: TCLP  
Prep Batch: 439878

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits	
Arsenic	4.00	4.450		mg/L		111	80 - 120	
Barium	2.00	2.042		mg/L		102	80 - 120	
Cadmium	2.00	1.986		mg/L		99	80 - 120	
Chromium	2.00	2.036		mg/L		102	80 - 120	
Lead	4.00	3.831		mg/L		96	80 - 120	
Selenium	8.00	8.984		mg/L		112	80 - 120	
Silver	2.00	2.098		mg/L		105	80 - 120	

Lab Sample ID: 310-295031-1 MS  
Matrix: Solid  
Analysis Batch: 441028

Client Sample ID: MW 7606  
Prep Type: TCLP  
Prep Batch: 439878

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits	
Arsenic	<0.300		4.00	4.183		mg/L		105	75 - 125	
Barium	4.31		2.00	6.132		mg/L		91	75 - 125	
Cadmium	<0.0600		2.00	1.878		mg/L		94	75 - 125	
Chromium	<0.0600		2.00	1.883		mg/L		94	75 - 125	
Lead	<0.300		4.00	3.675		mg/L		92	75 - 125	
Selenium	<0.300		8.00	8.619		mg/L		108	75 - 125	
Silver	<0.150		2.00	2.065		mg/L		103	75 - 125	

# QC Sample Results

Client: Marine Pollution Control Corp  
 Project/Site: Karma

Job ID: 310-295031-1

## Method: 7470A - Mercury (CVAA)

**Lab Sample ID: LB 310-439742/1-C**  
**Matrix: Solid**  
**Analysis Batch: 440102**

**Client Sample ID: Method Blank**  
**Prep Type: TCLP**  
**Prep Batch: 439886**

Analyte	LB Result	LB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	<0.00200		0.00200		mg/L		11/15/24 11:23	11/18/24 12:30	1

**Lab Sample ID: LCS 310-439742/2-C**  
**Matrix: Solid**  
**Analysis Batch: 440102**

**Client Sample ID: Lab Control Sample**  
**Prep Type: TCLP**  
**Prep Batch: 439886**

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Mercury	0.0167	0.01681		mg/L		101	80 - 120

**Lab Sample ID: 310-295031-1 MS**  
**Matrix: Solid**  
**Analysis Batch: 440102**

**Client Sample ID: MW 7606**  
**Prep Type: TCLP**  
**Prep Batch: 439886**

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
Mercury	<0.00200		0.0167	0.01624		mg/L		97	80 - 120



# QC Association Summary

Client: Marine Pollution Control Corp  
Project/Site: Karma

Job ID: 310-295031-1

## GC VOA

### Prep Batch: 439703

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-295031-1	MW 7606	Total/NA	Solid	5030B	
MB 310-439703/1-A	Method Blank	Total/NA	Solid	5030B	
LCS 310-439703/2-A	Lab Control Sample	Total/NA	Solid	5030B	
LCS 310-439703/3-A	Lab Control Sample	Total/NA	Solid	5030B	

### Analysis Batch: 439738

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-295031-1	MW 7606	Total/NA	Solid	OA-1 (GC)	439703
MB 310-439703/1-A	Method Blank	Total/NA	Solid	OA-1 (GC)	439703
LCS 310-439703/2-A	Lab Control Sample	Total/NA	Solid	OA-1 (GC)	439703
LCS 310-439703/3-A	Lab Control Sample	Total/NA	Solid	OA-1 (GC)	439703

## GC Semi VOA

### Prep Batch: 439656

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-295031-1	MW 7606	Total/NA	Solid	3546	

### Analysis Batch: 440204

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-295031-1	MW 7606	Total/NA	Solid	OA-2	439656

### Prep Batch: 440317

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-295031-1	MW 7606	Total/NA	Solid	3546	
MB 310-440317/1-A	Method Blank	Total/NA	Solid	3546	
LCS 310-440317/2-A	Lab Control Sample	Total/NA	Solid	3546	

### Analysis Batch: 440404

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-295031-1	MW 7606	Total/NA	Solid	8082A	440317
MB 310-440317/1-A	Method Blank	Total/NA	Solid	8082A	440317
LCS 310-440317/2-A	Lab Control Sample	Total/NA	Solid	8082A	440317

## Metals

### Leach Batch: 439742

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-295031-1	MW 7606	TCLP	Solid	1311	
LB 310-439742/1-B	Method Blank	TCLP	Solid	1311	
LB 310-439742/1-C	Method Blank	TCLP	Solid	1311	
LCS 310-439742/2-B	Lab Control Sample	TCLP	Solid	1311	
LCS 310-439742/2-C	Lab Control Sample	TCLP	Solid	1311	
310-295031-1 MS	MW 7606	TCLP	Solid	1311	

### Prep Batch: 439878

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-295031-1	MW 7606	TCLP	Solid	3010A	439742
LB 310-439742/1-B	Method Blank	TCLP	Solid	3010A	439742
LCS 310-439742/2-B	Lab Control Sample	TCLP	Solid	3010A	439742
310-295031-1 MS	MW 7606	TCLP	Solid	3010A	439742

Eurofins Cedar Falls

# QC Association Summary

Client: Marine Pollution Control Corp  
Project/Site: Karma

Job ID: 310-295031-1

## Metals

### Prep Batch: 439886

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-295031-1	MW 7606	TCLP	Solid	7470A	439742
LB 310-439742/1-C	Method Blank	TCLP	Solid	7470A	439742
LCS 310-439742/2-C	Lab Control Sample	TCLP	Solid	7470A	439742
310-295031-1 MS	MW 7606	TCLP	Solid	7470A	439742

### Analysis Batch: 440102

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-295031-1	MW 7606	TCLP	Solid	7470A	439886
LB 310-439742/1-C	Method Blank	TCLP	Solid	7470A	439886
LCS 310-439742/2-C	Lab Control Sample	TCLP	Solid	7470A	439886
310-295031-1 MS	MW 7606	TCLP	Solid	7470A	439886

### Analysis Batch: 441028

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-295031-1	MW 7606	TCLP	Solid	6010D	439878
LB 310-439742/1-B	Method Blank	TCLP	Solid	6010D	439878
LCS 310-439742/2-B	Lab Control Sample	TCLP	Solid	6010D	439878
310-295031-1 MS	MW 7606	TCLP	Solid	6010D	439878

# Lab Chronicle

Client: Marine Pollution Control Corp  
Project/Site: Karma

Job ID: 310-295031-1

**Client Sample ID: MW 7606**

**Lab Sample ID: 310-295031-1**

**Date Collected: 11/12/24 12:40**

**Matrix: Solid**

**Date Received: 11/12/24 15:05**

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Batch Analyst	Lab	Prepared or Analyzed
Total/NA	Prep	5030B			439703	P5ZC	EET CF	11/14/24 10:18
Total/NA	Analysis	OA-1 (GC)		1	439738	P5ZC	EET CF	11/15/24 11:54
Total/NA	Prep	3546			440317	BDJ4	EET CF	11/20/24 08:23
Total/NA	Analysis	8082A		1	440404	BW2O	EET CF	11/21/24 01:07
Total/NA	Prep	3546			439656	BDJ4	EET CF	11/14/24 08:03
Total/NA	Analysis	OA-2		1	440204	C3AA	EET CF	11/20/24 09:26
TCLP	Leach	1311			439742	U8FK	EET CF	11/14/24 15:00 - 11/15/24 07:00 <sup>1</sup>
TCLP	Prep	3010A			439878	F5MW	EET CF	11/18/24 09:30
TCLP	Analysis	6010D		3	441028	ZRI4	EET CF	11/26/24 13:29
TCLP	Leach	1311			439742	U8FK	EET CF	11/14/24 15:00 - 11/15/24 07:00 <sup>1</sup>
TCLP	Prep	7470A			439886	QTZ5	EET CF	11/15/24 11:23
TCLP	Analysis	7470A		1	440102	NFT2	EET CF	11/18/24 12:35

<sup>1</sup> 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: Marine Pollution Control Corp  
 Project/Site: Karma

Job ID: 310-295031-1

## 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	3546	Solid	PCB-1268

Kansas	NELAP	E-10341	01-31-25
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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
OA-1 (GC)	5030B	Solid	Benzene
OA-1 (GC)	5030B	Solid	Ethylbenzene
OA-1 (GC)	5030B	Solid	Toluene
OA-1 (GC)	5030B	Solid	Xylenes, Total
OA-2	3546	Solid	Diesel
OA-2	3546	Solid	Gasoline
OA-2	3546	Solid	Total Extractable Hydrocarbons
OA-2	3546	Solid	Waste Oil



# Method Summary

Client: Marine Pollution Control Corp  
Project/Site: Karma

Job ID: 310-295031-1

Method	Method Description	Protocol	Laboratory
OA-1 (GC)	Volatile Petroleum Hydrocarbons (GC)	Iowa DNR	EET CF
8082A	Polychlorinated Biphenyls (PCBs) by Gas Chromatography	SW846	EET CF
OA-2	Iowa - Extractable Petroleum Hydrocarbons (GC)	Iowa DNR	EET CF
6010D	Metals (ICP)	SW846	EET CF
7470A	Mercury (CVAA)	SW846	EET CF
1311	TCLP Extraction	SW846	EET CF
3010A	Preparation, Total Metals	SW846	EET CF
3546	Microwave Extraction	SW846	EET CF
5030B	Purge and Trap	SW846	EET CF
7470A	Preparation, Mercury	SW846	EET CF

**Protocol References:**

Iowa DNR = Iowa Department of Natural Resources

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

**Laboratory References:**

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



Environment Testing  
America



310-295031 Chain of Custody

### Cooler/Sample Receipt and Temperature Log Form

<b>Client Information</b>			
Client: <u>MPC</u>			
City/State:	CITY <u>Detroit</u>	STATE <u>MI</u>	Project: <u>Karna</u>
<b>Receipt Information</b>			
Date/Time Received:	DATE <u>11/12/24</u>	TIME <u>15:00</u>	Received By: <u>[Signature]</u>
Delivery Type: <input type="checkbox"/> UPS <input type="checkbox"/> FedEx <input type="checkbox"/> FedEx Ground <input type="checkbox"/> US Mail <input type="checkbox"/> Spee-Dee <input type="checkbox"/> Lab Courier <input type="checkbox"/> Lab Field Services <input checked="" type="checkbox"/> Client Drop-off <input type="checkbox"/> Other: _____			
<b>Condition of Cooler/Containers</b>			
Sample(s) received in Cooler?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes: Cooler ID: _____	
Multiple Coolers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes: Cooler # _____ of _____	
Cooler Custody Seals Present?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes: Cooler custody seals intact? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Sample Custody Seals Present?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes: Sample custody seals intact? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Trip Blank Present?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes: Which VOA samples are in cooler? ↓	
<b>Temperature Record</b>			
Coolant: <input checked="" type="checkbox"/> Wet ice <input type="checkbox"/> Blue ice <input type="checkbox"/> Dry ice <input type="checkbox"/> Other: _____ <input type="checkbox"/> NONE			
Thermometer ID: <u>U</u>		Correction Factor (°C): <u>0.3</u>	
• <b>Temp Blank Temperature</b> – If no temp blank, or temp blank temperature above criteria, proceed to Sample Container Temperature			
Uncorrected Temp (°C): <u>6.7</u>		Corrected Temp (°C): <u>6.7</u>	
• <b>Sample-Container-Temperature</b>			
Container(s) used:	CONTAINER 1	CONTAINER 2	
Uncorrected Temp (°C):			
Corrected Temp (°C):			
<b>Exceptions Noted</b>			
1) If temperature exceeds criteria, was sample(s) received same day of sampling? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No a) If yes: Is there evidence that the chilling process began? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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?) <input type="checkbox"/> Yes <input type="checkbox"/> No			
NOTE: If yes, contact PM before proceeding. If no, proceed with login			
<b>Additional Comments</b>			





## Login Sample Receipt Checklist

Client: Marine Pollution Control Corp

Job Number: 310-295031-1

**Login Number: 295031**

**List Source: Eurofins Cedar Falls**

**List Number: 1**

**Creator: Hirsch, Preston**

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.	False	Received same day of collection; chilling process has begun.
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	