



Environmental Engineering,
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September 3, 2020

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 – Davenport, Iowa
3rd Quarter 2020 - September 2020

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

Summary

- PCB concentration this quarter: 12 mg/kg;
- Ten-Sample Rolling PCB Average: 14.73 mg/kg;
- PCB 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.

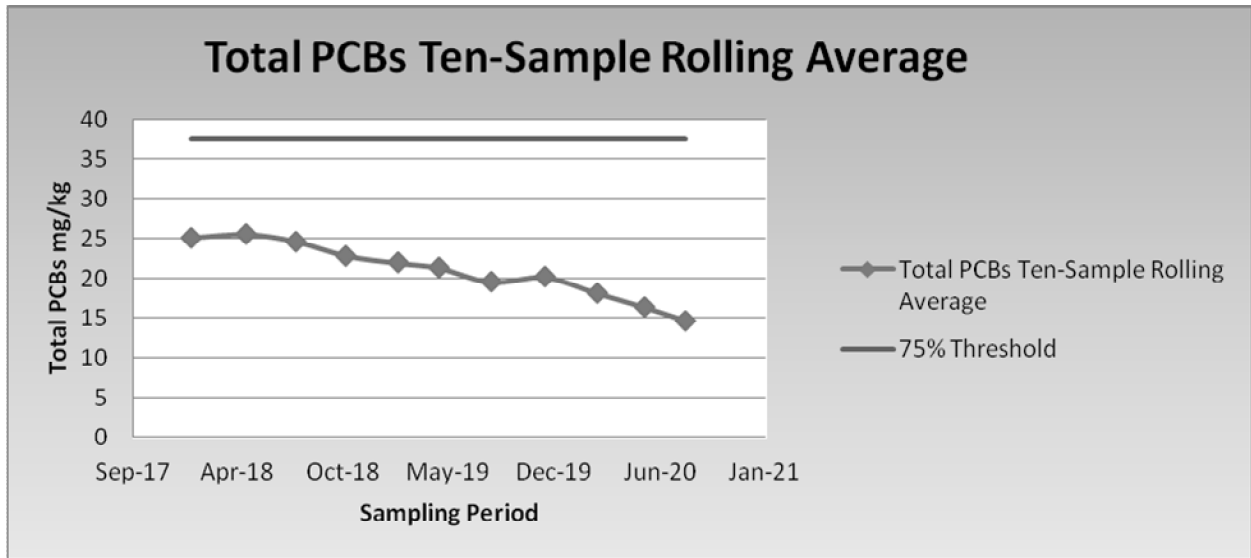
Details

In order to characterize the fluff, samples were collected and analyzed from the bulk seven-day composite sample. The composite sample was collected from July 13, 2020 through July 22, 2020 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 PCB results for the sampling period totaled 12 mg/kg. TCLP PCBs were not detected above the laboratory reporting limit. Barium, cadmium, and lead were the only RCRA metal identified above the laboratory reporting limits but below regulatory TCLP concentrations. The detected concentration for lead at 0.2 mg/L does not exceed the regulatory TCLP concentration of 5.0 mg/L. The present ten-sample rolling average for PCBs is 14.73 mg/kg. Rolling averages of the ten-sampling period results for total PCBs are presented below:



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Third quarter analytical results are summarized as follows:

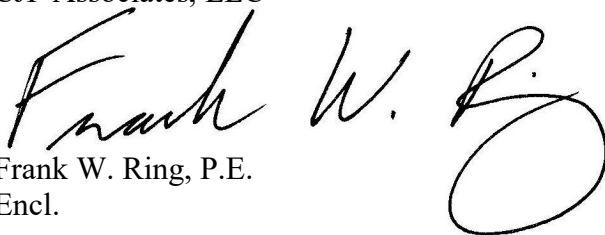
Sample ID	Analyte										Ignitability ²
	Total PCBs ¹	TCLP PCBs	TCLP Arsenic	TCLP Barium	TCLP Cad	TCLP Chrom	TCLP Lead	TCLP Sel	TCLP Silver	TCLP Mercury	
ZD-080620-003	12	ND	ND	0.77	0.16	ND	0.2	ND	ND	ND	>215

Notes: All TCLP results are reported in mg/L ND = Not Detected above Laboratory Detection Limits
 (1) Results reported in mg/kg NA = Not Analyzed
 (2) Results reported in degrees Fahrenheit

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: Patrick Kohlmeier, Alter
 Brian Seals, Waste Commission of Scott County
 Spencer Brothersen, Waste Commission of Scott County

ATTACHMENT A

LABORATORY ANALYTICAL RESULTS