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December 7, 2021

VIA ELECTRONIC SUBMITTAL

Bradley Mitchell
The Ohio Environmental Protection Agency
Lazarus Government Center
50 West Town Street, Suite 700
Columbus, OH 43215

Re: Ross Incineration Services, Inc.
EPA ID: OHD 048 415 665
Ohio ID: 02-47-0295
Submittal of Corrective Measures Completion of Work Report for Dawley Ditch

Dear Mr. Mitchell:

Ross Environmental Services, Inc. on behalf of Ross Incineration Services, Inc. ("RIS") hereby submits a Corrective Measures Completion of Work Report for Dawley Ditch ("CMCW Report"). This report is intended to document completion of Condition E.9(c)(xiii) of RIS Ohio Hazardous Waste Resource Conservation and Recovery Act ("RCRA") Part B Permit ("Part B Permit"), which requires RIS to develop and implement a remediation plan for Dawley Ditch. As such, the CMCW Report documents the following: cleanup objectives and applicable standards have been met; and constituents no longer pose an unacceptable risk to human health and the environment.

BACKGROUND: RIS operates a hazardous waste treatment and storage facility located in Eaton Township, Ohio. The primary service offered by RIS is treatment of hazardous waste by incineration. On January 29, 2014, RIS was issued a Part B Permit renewal from the Ohio Environmental Protection Agency ("EPA").

Corrective Action activities are permitted under RIS' Part B Permit Module E – *Corrective Action* and are incorporated into RIS' Permit Application as Section J – *Corrective Action*. RIS investigated Dawley Ditch as part of its Corrective Action RCRA Facility Investigation ("RFI"). The RFI Report characterizing the facility was submitted in 2009, and Ohio EPA approved the RFI Report in 2011. On December 27, 2017, Ohio EPA issued a Director Initiated Permit Modification ("DIPM") amending RIS' Permit, which required the Corrective Measures and implementation schedule be incorporated into RIS' Application.

In accordance with Condition E.9(c)(xiii) of the Part B Permit, RIS implemented a plan to remove sediments plus 6 inches of underlying soil from Dawley Ditch by dredging reducing ecological risk from persistent bioaccumulative toxic pollutants. Condition E.9(c)(xiii) requires RIS to satisfactorily manage a minimum of 90% of the current hazardous constituent loading in the Dawley Ditch contaminated sediments and soil. The final remedy also needs to address human health (i.e. barriers or controls to minimize contact with any remaining residual contamination). The Dawley Ditch Exposure Control Plan (“ECP”) was submitted to Ohio EPA on March 26, 2020, and Ohio EPA approved the ECP on April 23, 2020. RIS incorporated the Dawley Ditch Exposure Control Plan into RIS’ Part B Permit Application Section J – *Corrective Action*, Appendix J-8 – *Dawley Ditch Exposure Control Plan* on September 11, 2020. On October 8, 2020 RIS began work in Dawley Ditch; and work was complete on October 8, 2021

SUBMITTAL: The purpose of this submittal is to document the completion of Corrective Action requirements for Dawley Ditch. As such, RIS hereby submits a Dawley Ditch Report in accordance with RIS’ Permit Condition E.12 – *Completion of Corrective Action*. The CMCW Report for the Dawley Ditch is included as **Attachment 1**.

REQUEST FOR APPROVAL: RIS hereby requests approval of the CMCW Report for the Dawley Ditch. Upon approval of this report by the Ohio EPA, RIS will submit a Class 1 permit modification request (“PMR”) to revise its Permit to reflect completed exposure control activities in the Dawley Ditch.

CONFIDENTIAL INFORMATION: No Confidential Information is presented in the Dawley Ditch CMCW Report. As such, a separate Public Information Version will not be submitted to the Ohio EPA.

If you have any questions regarding this request, please contact Barbara Kewish at 440.748-5845, or me at 440.748.5847.

Sincerely,
ROSS ENVIRONMENTAL SERVICES, INC.



Susan K. Kaiser
Director, Corporate EHS

cc: Karen Nesbit, Ohio EPA, NEDO DMWM VIA ELECTRONIC SUBMITTAL
Halee Smith, Ohio EPA, CO VIA ELECTRONIC SUBMITTAL

Attachment 1
**[Corrective Measures Completion of Work Report
For Dawley Ditch]**

DAWLEY DITCH
CORRECTIVE MEASURES COMPLETION OF WORK

Ross Incineration Services, Inc.
36790 Giles Road
Grafton, Ohio 44044
December 2021

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LIST OF APPLICABLE DEFINITIONS AND ACRONYMS

Application -- RIS' Ohio Resource Conservation and Recovery Act ("RCRA") Part B Permit Application

CAP - Corrective Action Program

CMCW Report - Corrective Measures Completion of Work Final Report

DIPM - Director Initiated Permit Modification

ECP – Exposure Control Plan

EPA - Environmental Protection Agency

ERA - Ecological Risk Assessment

FWL - Freshwater Lake

OAC - Ohio Administrative Code

PBT – Persistent Bioaccumulative Toxic

PECOC - Potential Ecological Chemicals of Concern

Permit - RIS' Ohio Hazardous Waste Facility RCRA Part B Permit

PCB - Polychlorinated Biphenyl

RCRA - Resource Conservation and Recovery Act

RFI - RCRA Facility Investigation

RIS - Ross Incineration Services, Inc.

DAWLEY DITCH CORRECTIVE MEASURES COMPLETION OF WORK

1. INTRODUCTION

Ross Incineration Services, Inc. (“RIS”) operates a hazardous waste treatment and storage facility located at 36790 Giles Road Eaton Township, Ohio. On January 29, 2014, the Ohio Environmental Protection Agency (“Ohio EPA” or “the Agency”) issued an Ohio Hazardous Waste Facility Resource Conservation and Recovery Act (“RCRA”) Part B Permit (“Permit”) to RIS.

Corrective Action activities are permitted under RIS’ RCRA Part B Permit Module E – *Corrective Action* and are incorporated into RIS’ Ohio RCRA Part B Permit Application (“Application”) as Section J – *Corrective Action*. RIS investigated Dawley Ditch as part of its Corrective Action RCRA Facility Investigation (“RFI”). The RFI Report characterizing the facility was submitted in 2009, and Ohio EPA approved the RFI Report in 2011. On December 27, 2017, Ohio EPA issued a Director Initiated Permit Modification (“DIPM”) amending RIS’ Permit and setting forth Corrective Measures and an implementation schedule for the facility.

In accordance with Condition E.9(c)(xiii) of the RCRA Part B Permit, RIS implemented a plan to remove sediment plus 6 inches of underlying soil from Dawley Ditch to reduce ecological risk from persistent bioaccumulative toxic pollutants. Condition E.9(c)(xiii) requires RIS to satisfactorily manage a minimum of 90% of the current hazardous constituent loading in Dawley Ditch contaminated sediment and soil. As such, RIS developed and submitted the Dawley Ditch Exposure Control Plan (“ECP”). The Dawley Ditch ECP was submitted to Ohio EPA on March 26, 2020, and Ohio EPA approved the ECP on April 23, 2020. RIS incorporated the Dawley Ditch ECP into RIS’ Part B Permit Application Section J – *Corrective Action*, Appendix J-8 – *Dawley Ditch Exposure Control Plan* on September 11, 2020.

Beginning October 8, 2020 RIS began work to implement the ECP. The Dawley Ditch Corrective Measures Completion of Work Final Report (“CMCW Report”) serves to document implementation of RCRA Corrective Action Program (“CAP”) requirements for Dawley Ditch. Per OAC Rule 3745-54-101 and RIS Permit Condition E.12 - *Completion of Corrective Action*, the CMCW Report for Dawley Ditch documents that Corrective Action construction is complete, cleanup objectives and applicable standards are met, and potential release of hazardous waste or constituents no longer poses an unacceptable risk to human health or the environment.

2. DAWLEY DITCH DESCRIPTION

Dawley Ditch, an intermittent stream that flows through the eastern portion of the RIS facility, flows westerly onto the northeastern portion of RIS, turns to the south and exits the

facility fenceline. A significant portion of Dawley Ditch flows parallel and outside the facility fenceline next to the southeastern side of the facility. Dawley Ditch empties into Willow Creek, a few hundred feet south of the site. Long ago, a portion of the ditch was artificially rerouted onto the southern portion of the facility.

The ditch collects rainwater runoff from a large rural area east of the facility. The ditch contains vegetation typical of the area, i.e., cottonwood, pin oak, and ash trees; sedges; and grasses. Flow in the ditch is generally slow and is typically depositional. Flow rates in the ditch can average 145 gallons per minute (“gpm”) when flowing. However, flow varies seasonally.

An earthen dike extending along a portion of Dawley Ditch prohibits stormwater run-off from the active area of the facility from entering the ditch. The Freshwater Lake, located in the north central portion of the facility, also communicates with Dawley Ditch during times of high precipitation.

3. CHARACTERIZATION ACTIVITIES IN DAWLEY DITCH

As part of the RFI, RIS sampled Dawley Ditch several times. RIS sampled and analyzed surface water and sediment in the ditch in 1986, 1987, 1994, and 2000. Samples were analyzed for water quality and a variety of organic and inorganic constituents.

Additional observational data was collected between 2000 and 2003, and again in 2009 to determine seasonal times of higher flow. Typically, surface water has higher flow in the spring, between March and June, followed by lower flow with intermittent higher flow events between July and November. Generally flow is lower between December and February with intermittent freezing.

During the RFI, Dawley Ditch was evaluated for human exposure risks to surface water and ecological exposure to surface water and sediment. Potential risks for human exposure to Dawley Ditch were within acceptable limits.

During the RFI Dawley Ditch was included in the Ecological Risk Assessment (“ERA”), The ERA for Dawley Ditch was comprised of both a qualitative and quantitative evaluation. The qualitative evaluation consisted of three ecological surveys conducted at RIS and confirmed that ecological receptors in and around Dawley Ditch show no obvious signs of stress. The quantitative ecological risk evaluation calculated potential risks for direct chemical exposures to lower level receptors and bioaccumulative exposures to upper level receptors. Potential Ecological Chemicals of Concern (“PECOC”) identified in Dawley Ditch surface water and sediment include low levels of fourteen (14) metals, three (3) semi-volatile organic compounds, polychlorinated biphenyls (“PCB”) and dioxin.

Based on the findings of the RFI, RIS implemented a plan to remove sediments plus 6 inches of underlying soil from Dawley Ditch (“Ditch”) to reduce ecological risk from persistent bioaccumulative toxic pollutants. The remedy was designed to remove a minimum of 90% of the current hazardous constituent loading in Ditch contaminated sediments and soil. In order to effectively remove 90% of the hazardous constituent loading, data was evaluated to determine the locations of the most significant persistent bioaccumulative toxic (“PBT”) detections. PBTs were of primary consideration because of their potential bioaccumulative effect on ecological receptors. As such, detected analytical results for Dioxin, PCBs, and Mercury data were considered at ten (10) sample locations throughout the ditch. The sample locations are identified in **Attachment A – Sediment Removal Area**. In addition, sample results for PBT chemicals of concern are in **Attachment B - PBT Analytical Summary Table**.

To determine a relative burden of PBTs, each sample location and PBT chemical were weighted equally. In addition, all reported data was conservatively considered at 100% of its reported value, even if a qualifier was assigned to the data by the laboratory. Detected PBTs were added together to determine a total PBT burden at each location. The data evaluation showed that sample locations SS-SED-4 through SS-SED-10 contain 90% of the total PBT chemical burden in the ditch. As such, in order to remove 90% of the hazardous constituent loading the remediation area was defined as fifty (50) feet upstream of location SS-SED-4 through location SS-SED-10.

4. 2021 DAWLEY DITCH EXPOSURE CONTROL PLAN IMPLEMENTATION

The Dawley Ditch ECP outlined steps to be taken to complete remediation activities in the ditch. Generally, activities included removal of vegetation in the ditch, steps to manage/divert water if necessary, excavation of sediment and underlying clays, and disposal of excavated material. Sediment and soil removal activities were planned for times of lower Ditch flow. The project completion schedule was weather dependent.

On October 8, 2020 RIS began to prepare for vegetation and tree removal in the ditch. Trees and scrub-shrub vegetation were removed to allow better access the ditch during excavation. To prepare for vegetation removal, RIS placed straw bales in the ditch downstream of the tree removal area to catch sediment that may be displaced during the project and prevent it from flowing downstream. To allow for contractor access to the ditch, a small opening was made in RIS’ fence line. The fence was closed at the end of each work day to maintain facility security. Because the portion of Dawley Ditch requiring remediation is adjacent to and outside of the facility fenceline, a long-reach crane was used to access the ditch without having to remove large sections of the facility fence. Vegetation and tree removal continued intermittently, as weather allowed, until December 2020.

As the Dawley Ditch project was weather dependent, RIS began excavation activities in the ditch when the weather forecast predicted several consecutive days of dry weather. As such, RIS planned excavation activities for September 2021, and as a contingency also planned to manage precipitation and ditch flow should it be necessary. On September 20, 2021 RIS placed supersacks of clean sand in the ditch upstream of the remediation area. The purpose of the supersacks was to help block potential water flow into the excavation area and divert ditch water flow to the Freshwater Lake. In addition, RIS rented a pump with 6-inch diameter hose and placed several other smaller pumps and hoses at the jobsite. The pumps and hose would be used to divert water around the excavation area, if necessary.

On September 28, 2021, RIS began removal of sediment and underlying clay from the ditch. RIS began the excavation at the upstream location, fifty (50) feet upstream of location SS-SED-4. Mounded dirt/clay was placed at the upper-most area of the excavation in an additional effort to stop potential precipitation from flowing into the excavation area should it rain. A long-reach backhoe was used to access the ditch; and a small opening was made in the fence to allow personnel access to the ditch area. The fence opening was closed every night to maintain facility security.

A total of eighteen (18) inches of sediment and underlying clays were removed from the ditch to ensure that all sediment and six (6) inches of underlying clay was removed throughout the remediation area. Excavated material was directly placed into a dump truck and was shipped same-day to Republic Landfill in Oberlin, Ohio. No material was placed or staged on the ground during excavation.

Excavation continued through Friday October 1, 2021. RIS removed sediment and more than six (6) inches of underlying clay over a distance of 800 feet in Dawley Ditch. A total of twenty-three (23) dump truck loads (about 160,000 lbs.) of sediment, clay and soils were disposed at Republic Landfill in Oberlin, Ohio over the course of the project. After removal, the ditch bottom and bank were compacted with the backhoe bucket to minimize post-excavation sediment migration. In addition, areas disturbed by backhoe traffic were seeded and mulched on October 2, 2021.

Please refer to **Attachment C – Field Notes**, and **Attachment D – Project Photographs**.

5. DATA COLLECTION AND EVALUATION

In accordance with the Dawley Ditch ECP, samples were collected at three (3) discreet locations after remediation was complete. The first of three (3) confirmatory samples was collected at SS-SED-04. One (1) sample and 1 duplicate sample were collected from SS-SED-04. The second sample was collected at location SS-SED-05. The final sample was collected at location SS-SED-

10. Refer to **Attachment A – Sediment Removal Area** for sample locations. Samples were sent to Eurofins TestAmerica located in North Canton, Ohio for analysis. Samples were analyzed for PCBs in compliance with the Dawley Ditch ECP. Upon receipt of the data, the analytical results were compared to the agreed upon screening level of 0.5 mg/kg. Sample results were below the screening level of 0.5 mg/kg; as such, confirmatory samples were within acceptable limits. Analytical data is included as **Attachment E – Analytical Data**. Analyses confirmed that RIS satisfactorily managed a minimum of 90% of the hazardous constituent loading of Ditch contaminated sediments and soil. In addition, with removal of sediment and more than 6” of underlying material from the ditch, RIS effectively eliminated potential future risk for human contact with the Dawley Ditch sediments.

6. COMPLETION OF CORRECTIVE ACTION

This CMCW Report meets the requirements of OAC Rule 3745-54-101 and RIS Permit Condition E-12 Completion of Corrective Action. The removal of sediment and underlying materials from Dawley Ditch meets the Dawley Ditch ECP objectives, and the area no longer poses an unacceptable risk to human health or the environment. An Independent Engineer’s Certification required per ORC Section 4733.01, for the Dawley Ditch CMCW is included as **Attachment F – Independent Engineer’s Certification**.

Attachment A
Sediment Removal Area

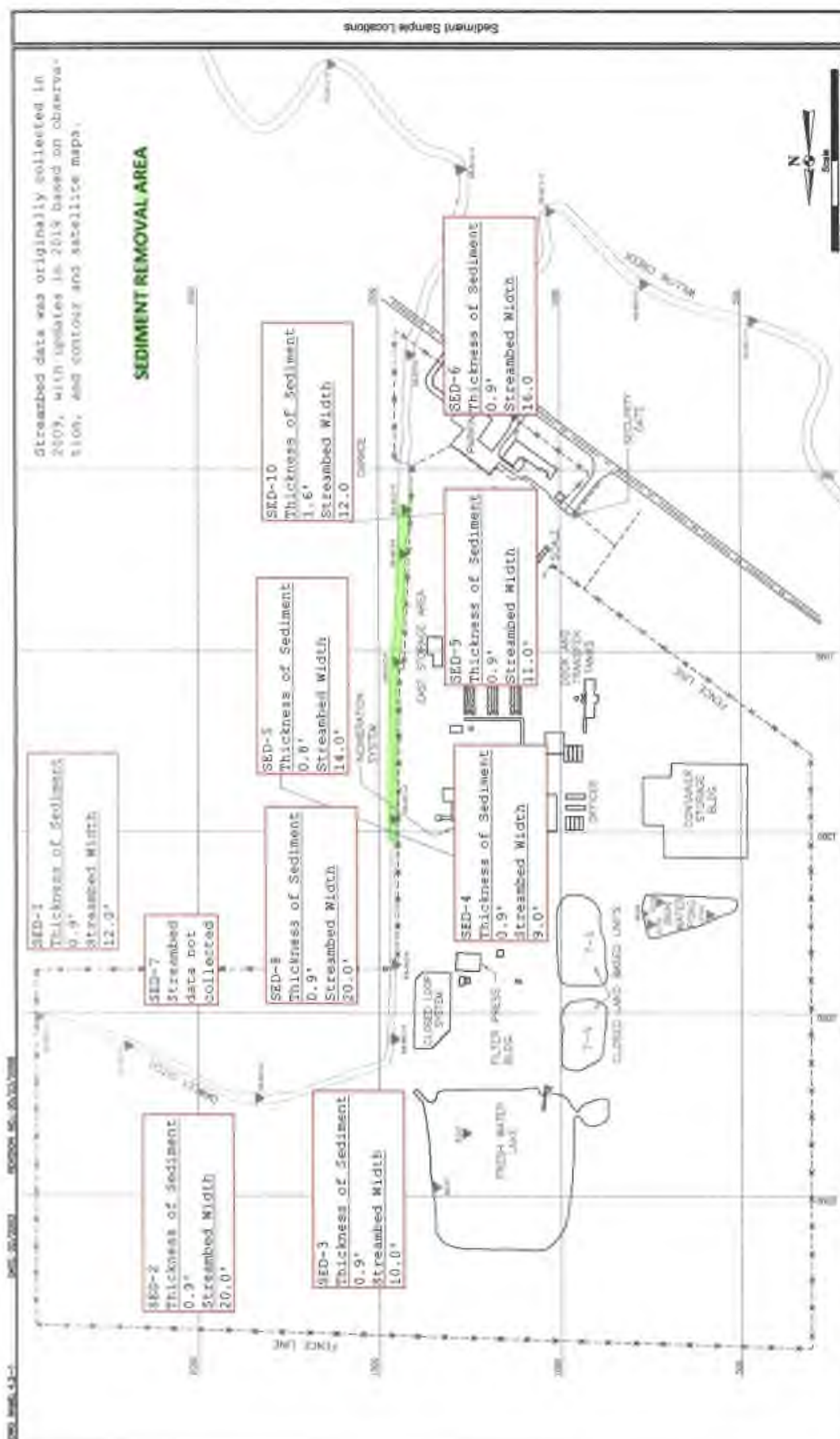


Figure 4.3-1

Sediment Sample Locations, Ross Incineration Services, Inc., Grafton, Ohio



Attachment B

PBT Analytical Summary Table

Oswego Ditch Sediment Concentrations - PBT PECCCA

Value	Sediment Sample Locations (increasing downstream order)										
	1 - Background	2	3	4	5	6	7	8	9	10	6
Dioxin TCQ - Mammal (ug/kg)	0	0	0.11	0.001	0.002	0.475	0.331	0	0.331	0	0.3670
Arochlor 1254 (ug/kg)	31	400	66	330	890	3900	1100	770	1100	770	290
Arochlor 1260 (ug/kg)	31	35	21	0	400	4200	920	0	920	0	190
Mercury (ug/kg)	65	60	150	41	320	1200	600	0	600	0	350
Total PBT Burden - no qualifiers (ug/kg)	0	0	66	330	320	14300	2620	770	2620	770	350
Total PBT Burden - qualifier flags (ug/kg)	143	487	66	36	3310	348	0	0	331	0	48

Removal of SMMC Qualifiers

Flagged data treated at:
 Total Burden (locations 7-6): 21203 ug/kg
 Burden locations & 10: 35323 ug/kg
 Percent Removal: 39%

Flagged data treated at:
 Total Burden (locations 7-6): 20004 ug/kg
 Burden locations & 10: 18605 ug/kg
 Percent Removal: 93%

Flagged data treated at:
 Total Burden (locations 7-6): 18656 ug/kg
 Burden locations & 12: 18010 ug/kg
 Percent Removal: 97%

Remediated Area

Attachment C

Field Notes

Dawley Ditch Field Notes – 2020-2021

October 8, 2020 – Dennis Tree Service is on-site preparing to remove Dawley Ditch vegetation. A long-reach crane, and hand-held chain saws will be used to cut tree and bushes from the ditch area.

After contractor training, contractors set up at the southern-most point to be excavated and began tree removal. Trees were removed, cut to 6' lengths and placed in the Equipment Storage Area. Smaller trees were mulched on-site.

Due to scheduling constraints and weather, Dennis was on-site intermittently until December 2020 removing trees and vegetation along the length in the Ditch in the area to be excavated.

September 28, 2021 - Excavation activities began 9/28 with a single dump truck transporting excavated soil to Republic's Oberlin landfill. Four total loads of excavated material were shipped.

251' of the ditch was remediated. Basically starting from Bulk Repack to the south wall of the Control Room Building (east of the South Landfill). The excavation depth averaged 16"-18" from top of sediment in ditch bed.

Upon removal of excavated material, confirmatory sample UP-1 and UP-1 DUP were collected for PCB testing at the most-upstream area of excavation, at location SS-SED-4.

September 29, 2021 - The excavation continued from north to south along the ditch. Three dump trucks were making the loop to the landfill. 10 total loads were shipped for landfill to Republic in Oberlin.

September 30, 2021 – The excavation continued from north to south along the ditch. By mid-day the excavation was completed to 520' of the total 800 linear feet to east of the old dock. Access is limited east of the old dock and the excavation will continue when the backhoe can be repositioned.

A second confirmatory sample - MID-2, was taken at 400' south of UP-1 (at the mid-point of the excavation), at location SS-SED-5.

Eight loads were loaded and sent to Republic Landfill.

Project is on track for complete removal of remediation material from ditch by Friday September 30, 2021. An Independent Professional Engineer (P.E.) is scheduled to visit the project site on Friday September 30, 2021.

October 1, 2021 – About 15' of ditch remained to be excavated at the beginning of the day. The PE walked the site beginning around 10:00 am. He seemed satisfied with the progress and will certify the report once sample analysis is complete and the report is prepared.

Excavation activities are complete by end of day. One (1) load of excavated material was sent to Republic in Oberlin. Compacting activities continued. The temporary sand dam and earthen dams are removed. Contractors prepared to seed and mulch areas disturbed by backhoe.

A final confirmatory sample, DN-3 at location SS-SED-10, was collected at the southern-most extent of the excavation.

October 2, 2021 - Contractors continued to grade, seed and mulch areas disturbed by backhoe.

Work is complete October 2, 2021.

October 8, 2021 -Dawley Ditch confirmatory data was received. The results are below the screening level documented in the Exposure Control Plan (0.5 mg/kg). Sample results were as follows:

Constituent	Screening Level	UP-1	UP-1 DUP	MID-2	DN-3
PCB	0.5 mg/kg	0.190 mg/kg	0.110 mg/kg	BDL mg/kg	BDL mg/kg

All results are below the screening level.

Attachment D
Project Photographs

October 8, 2020 – Tree and vegetation removal activities in Dawley Ditch. Long reach crane used to reach over the facility fenceline. Looking North.



October 8, 2020 – Tree and vegetation removal activities in Dawley Ditch. Straw staged in the area. Looking East.



October 8, 2020 – Tree and vegetation removal activities in Dawley Ditch. Straw placed downstream of the working area to prevent potential sediment from moving downstream during remediation activities. Looking East.



October 8, 2020 – Tree and vegetation removal activities in Dawley Ditch. Dawley Ditch shown containing scrub/shrub vegetation. Looking Northeast.



October 8, 2020 – Tree and vegetation removal activities in Dawley Ditch. Long reach crane used to reach over the facility fenceline. Looking North.



September 20, 2021 – Sand-filled totes used to prevent water flow downstream to the excavation area. Placed prior to beginning excavation.



September 28, 2021 – Tree and vegetation removal activities in Dawley Ditch. Long reach backhoe used to reach over the facility fence line. Looking South.



September 28, 2021 – Upstream remediation area, beginning excavation. Note earthen dam created to help prevent flow of water through ditch during excavation on left side of the photo. Looking East.



September 28, 2021 – Upstream remediation area, beginning excavation. Note earthen dam created to help prevent flow of water through ditch during excavation. Looking North.



September 28, 2021 – Excavation of sediment and at least 6" underlying clays in Dawley Ditch. Looking Southeast.



September 28, 2021 – Upstream remediation area, beginning excavation. Looking North.



September 28, 2021 – Documentation of excavation of sediment and at least 6" underlying clays in Dawley Ditch.



September 28, 2021 – Excavation of sediment and at least 6" underlying clays in Dawley Ditch. Looking South.



September 28, 2021 – Excavation of sediment and at least 6" underlying clays in Dawley Ditch. Looking South.



September 28, 2021 – Excavation of sediment and at least 6" underlying clays in Dawley Ditch. Looking North.



September 30, 2021 – Excavation of sediment and at least 6" underlying clays in Dawley Ditch. Note sides are compacted to prevent sediment runoff after project completion. Looking North.



September 30, 2021 – Excavation of sediment and at least 6" underlying clays in Dawley Ditch. Note sides are compacted to prevent sediment runoff after project completion. Looking North.



September 30, 2021 – Excavation of sediment and at least 6" underlying clays in Dawley Ditch. Note sides are compacted to prevent sediment runoff after project completion. Looking South.



September 30, 2021 – Excavation of sediment and at least 6" underlying clays in Dawley Ditch. Backhoe compacting sides to prevent sediment runoff after project completion. Looking South.



September 30, 2021 – Excavation of sediment and at least 6" underlying clays in Dawley Ditch. Southern-most point of excavation. Sides have been compacted to prevent sediment runoff after project completion. Looking South.



Attachment E
Analytical Data

ANALYTICAL REPORT

Eurofins TestAmerica, Canton
4101 Shuffel Street NW
North Canton, OH 44720
Tel: (330)497-9396

Laboratory Job ID: 240-157284-1
Client Project/Site: Dawley Ditch

For:
Ross Incineration Services, Inc.
150 Innovation Drive
Elyria, Ohio 44035

Attn: Ms. Barbara Kewish



Authorized for release by:
10/7/2021 5:19:57 PM

Opal Johnson, Project Manager II
(330)966-9279
opal.johnson@eurofinset.com

LINKS

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This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

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Definitions/Glossary

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Qualifiers

GC Semi VOA

Qualifier	Qualifier Description
U	Indicates the analyte was analyzed for but not detected.

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

Case Narrative

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Job ID: 240-157284-1

Laboratory: Eurofins TestAmerica, Canton

Narrative

CASE NARRATIVE

Client: Ross Incineration Services, Inc.

Project: Dawley Ditch

Report Number: 240-157284-1

With the exceptions noted as flags or footnotes, standard analytical protocols were followed in the analysis of the samples and no problems were encountered or anomalies observed. In addition all laboratory quality control samples were within established control limits, with any exceptions noted below. Each sample was analyzed to achieve the lowest possible reporting limit within the constraints of the method. In some cases, due to interference or analytes present at high concentrations, samples were diluted. For diluted samples, the reporting limits are adjusted relative to the dilution required.

Eurofins TestAmerica, Canton attests to the validity of the laboratory data generated by Eurofins TestAmerica facilities reported herein. All analyses performed by Eurofins TestAmerica facilities were done using established laboratory SOPs that incorporate QA/QC procedures described in the application methods. Eurofins TestAmerica's operations groups have reviewed the data for compliance with the laboratory QA/QC plan, and data have been found to be compliant with laboratory protocols unless otherwise noted below.

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory.

Calculations are performed before rounding to avoid round-off errors in calculated results.

All holding times were met and proper preservation noted for the methods performed on these samples, unless otherwise detailed in the individual sections below.

All solid sample results are reported on an "as received" basis unless otherwise indicated by the presence of a % solids value in the method header.

This laboratory report is confidential and is intended for the sole use of Eurofins TestAmerica and its client.

RECEIPT

The samples were received on 10/1/2021 12:00 PM. 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 was 0.4° C.

POLYCHLORINATED BIPHENYLS (PCBS)

Samples UP-1 (240-157284-1), MID-2 (240-157284-2), DN-3 (240-157284-3) and UP-1 DUP (240-157284-4) were analyzed for polychlorinated biphenyls (PCBs) in accordance with EPA SW-846 Method 8082A. The samples were prepared on 10/05/2021 and analyzed on 10/06/2021.

All of the samples in this data set analyzed for PCBs were subjected to the sulfuric acid cleanup procedure before instrumental analysis, per EPA Method 3665A.

The following samples required a copper clean-up to reduce matrix interferences caused by sulfur: DN-3 (240-157284-3), UP-1 DUP (240-157284-4). Reagent: 5372415.

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

Case Narrative

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Job ID: 240-157284-1 (Continued)

Laboratory: Eurofins TestAmerica, Canton (Continued)

PERCENT SOLIDS

Samples UP-1 (240-157284-1), MID-2 (240-157284-2), DN-3 (240-157284-3) and UP-1 DUP (240-157284-4) were analyzed for percent solids in accordance with ASTM Method D2216-80. The samples were analyzed on 10/04/2021.

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

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Method Summary

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Method	Method Description	Protocol	Laboratory
8082A	Polychlorinated Biphenyls (PCBs) by Gas Chromatography	SW846	TAL CAN
Moisture	Percent Moisture	EPA	TAL CAN
3540C	Soxhlet Extraction	SW846	TAL CAN

Protocol References:

EPA = US Environmental Protection Agency

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

Laboratory References:

TAL CAN = Eurofins TestAmerica, Canton, 4101 Shuffel Street NW, North Canton, OH 44720, TEL (330)497-9396

Sample Summary

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
240-157284-1	UP-1	Solid	09/29/21 10:00	10/01/21 12:00
240-157284-2	MID-2	Solid	09/30/21 08:00	10/01/21 12:00
240-157284-3	DN-3	Solid	09/30/21 15:00	10/01/21 12:00
240-157284-4	UP-1 DUP	Solid	09/29/21 10:00	10/01/21 12:00

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Detection Summary

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Client Sample ID: UP-1

Lab Sample ID: 240-157284-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Aroclor-1254	190		61	28	ug/Kg	1	✳	8082A	Total/NA

Client Sample ID: MID-2

Lab Sample ID: 240-157284-2

No Detections.

Client Sample ID: DN-3

Lab Sample ID: 240-157284-3

No Detections.

Client Sample ID: UP-1 DUP

Lab Sample ID: 240-157284-4

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Aroclor-1254	110		64	29	ug/Kg	1	✳	8082A	Total/NA

This Detection Summary does not include radiochemical test results.

Eurofins TestAmerica, Canton

Client Sample Results

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Client Sample ID: UP-1

Lab Sample ID: 240-157284-1

Date Collected: 09/29/21 10:00

Matrix: Solid

Date Received: 10/01/21 12:00

Percent Solids: 82.0

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Aroclor-1016	61	U	61	27	ug/Kg	✳	10/05/21 09:08	10/06/21 17:37	1
Aroclor-1221	61	U	61	29	ug/Kg	✳	10/05/21 09:08	10/06/21 17:37	1
Aroclor-1232	61	U	61	28	ug/Kg	✳	10/05/21 09:08	10/06/21 17:37	1
Aroclor-1242	61	U	61	23	ug/Kg	✳	10/05/21 09:08	10/06/21 17:37	1
Aroclor-1248	61	U	61	29	ug/Kg	✳	10/05/21 09:08	10/06/21 17:37	1
Aroclor-1254	190		61	28	ug/Kg	✳	10/05/21 09:08	10/06/21 17:37	1
Aroclor-1260	61	U	61	27	ug/Kg	✳	10/05/21 09:08	10/06/21 17:37	1
Aroclor-1262	61	U	61	38	ug/Kg	✳	10/05/21 09:08	10/06/21 17:37	1
Aroclor-1268	61	U	61	28	ug/Kg	✳	10/05/21 09:08	10/06/21 17:37	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
Tetrachloro-m-xylene	82		14 - 128	10/05/21 09:08	10/06/21 17:37	1
DCB Decachlorobiphenyl	97		10 - 132	10/05/21 09:08	10/06/21 17:37	1

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Percent Moisture	18.0		0.1	0.1	%			10/04/21 19:22	1

Client Sample Results

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Client Sample ID: MID-2

Lab Sample ID: 240-157284-2

Date Collected: 09/30/21 08:00

Matrix: Solid

Date Received: 10/01/21 12:00

Percent Solids: 81.5

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Aroclor-1016	63	U	63	28	ug/Kg	✳	10/05/21 09:08	10/06/21 17:52	1
Aroclor-1221	63	U	63	30	ug/Kg	✳	10/05/21 09:08	10/06/21 17:52	1
Aroclor-1232	63	U	63	29	ug/Kg	✳	10/05/21 09:08	10/06/21 17:52	1
Aroclor-1242	63	U	63	24	ug/Kg	✳	10/05/21 09:08	10/06/21 17:52	1
Aroclor-1248	63	U	63	30	ug/Kg	✳	10/05/21 09:08	10/06/21 17:52	1
Aroclor-1254	63	U	63	29	ug/Kg	✳	10/05/21 09:08	10/06/21 17:52	1
Aroclor-1260	63	U	63	28	ug/Kg	✳	10/05/21 09:08	10/06/21 17:52	1
Aroclor-1262	63	U	63	39	ug/Kg	✳	10/05/21 09:08	10/06/21 17:52	1
Aroclor-1268	63	U	63	29	ug/Kg	✳	10/05/21 09:08	10/06/21 17:52	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
Tetrachloro-m-xylene	74		14 - 128	10/05/21 09:08	10/06/21 17:52	1
DCB Decachlorobiphenyl	85		10 - 132	10/05/21 09:08	10/06/21 17:52	1

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Percent Moisture	18.5		0.1	0.1	%			10/04/21 19:22	1

Client Sample Results

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Client Sample ID: DN-3

Lab Sample ID: 240-157284-3

Date Collected: 09/30/21 15:00

Matrix: Solid

Date Received: 10/01/21 12:00

Percent Solids: 86.2

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Aroclor-1016	57	U	57	25	ug/Kg	✳	10/05/21 09:08	10/06/21 18:07	1
Aroclor-1221	57	U	57	27	ug/Kg	✳	10/05/21 09:08	10/06/21 18:07	1
Aroclor-1232	57	U	57	26	ug/Kg	✳	10/05/21 09:08	10/06/21 18:07	1
Aroclor-1242	57	U	57	22	ug/Kg	✳	10/05/21 09:08	10/06/21 18:07	1
Aroclor-1248	57	U	57	27	ug/Kg	✳	10/05/21 09:08	10/06/21 18:07	1
Aroclor-1254	57	U	57	26	ug/Kg	✳	10/05/21 09:08	10/06/21 18:07	1
Aroclor-1260	57	U	57	25	ug/Kg	✳	10/05/21 09:08	10/06/21 18:07	1
Aroclor-1262	57	U	57	35	ug/Kg	✳	10/05/21 09:08	10/06/21 18:07	1
Aroclor-1268	57	U	57	26	ug/Kg	✳	10/05/21 09:08	10/06/21 18:07	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
Tetrachloro-m-xylene	73		14 - 128	10/05/21 09:08	10/06/21 18:07	1
DCB Decachlorobiphenyl	87		10 - 132	10/05/21 09:08	10/06/21 18:07	1

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Percent Moisture	13.8		0.1	0.1	%			10/04/21 19:22	1

Client Sample Results

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Client Sample ID: UP-1 DUP

Lab Sample ID: 240-157284-4

Date Collected: 09/29/21 10:00

Matrix: Solid

Date Received: 10/01/21 12:00

Percent Solids: 78.5

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Aroclor-1016	64	U	64	28	ug/Kg	✳	10/05/21 09:08	10/06/21 18:21	1
Aroclor-1221	64	U	64	31	ug/Kg	✳	10/05/21 09:08	10/06/21 18:21	1
Aroclor-1232	64	U	64	29	ug/Kg	✳	10/05/21 09:08	10/06/21 18:21	1
Aroclor-1242	64	U	64	24	ug/Kg	✳	10/05/21 09:08	10/06/21 18:21	1
Aroclor-1248	64	U	64	31	ug/Kg	✳	10/05/21 09:08	10/06/21 18:21	1
Aroclor-1254	110		64	29	ug/Kg	✳	10/05/21 09:08	10/06/21 18:21	1
Aroclor-1260	64	U	64	28	ug/Kg	✳	10/05/21 09:08	10/06/21 18:21	1
Aroclor-1262	64	U	64	40	ug/Kg	✳	10/05/21 09:08	10/06/21 18:21	1
Aroclor-1268	64	U	64	29	ug/Kg	✳	10/05/21 09:08	10/06/21 18:21	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
Tetrachloro-m-xylene	82		14 - 128	10/05/21 09:08	10/06/21 18:21	1
DCB Decachlorobiphenyl	99		10 - 132	10/05/21 09:08	10/06/21 18:21	1

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Percent Moisture	21.5		0.1	0.1	%			10/04/21 19:22	1

Surrogate Summary

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

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	TCX1	DCBP1
		(14-128)	(10-132)
240-157284-1	UP-1	82	97
240-157284-2	MID-2	74	85
240-157284-3	DN-3	73	87
240-157284-4	UP-1 DUP	82	99
LCS 240-506730/14-A	Lab Control Sample	68	96
MB 240-506730/13-A	Method Blank	94	123

Surrogate Legend

TCX = Tetrachloro-m-xylene

DCBP = DCB Decachlorobiphenyl

QC Sample Results

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

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

Lab Sample ID: MB 240-506730/13-A
Matrix: Solid
Analysis Batch: 507022

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 506730

Analyte	MB MB		RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Aroclor-1016	50	U	50	22	ug/Kg		10/05/21 09:08	10/06/21 16:54	1
Aroclor-1221	50	U	50	24	ug/Kg		10/05/21 09:08	10/06/21 16:54	1
Aroclor-1232	50	U	50	23	ug/Kg		10/05/21 09:08	10/06/21 16:54	1
Aroclor-1242	50	U	50	19	ug/Kg		10/05/21 09:08	10/06/21 16:54	1
Aroclor-1248	50	U	50	24	ug/Kg		10/05/21 09:08	10/06/21 16:54	1
Aroclor-1254	50	U	50	23	ug/Kg		10/05/21 09:08	10/06/21 16:54	1
Aroclor-1260	50	U	50	22	ug/Kg		10/05/21 09:08	10/06/21 16:54	1
Aroclor-1262	50	U	50	31	ug/Kg		10/05/21 09:08	10/06/21 16:54	1
Aroclor-1268	50	U	50	23	ug/Kg		10/05/21 09:08	10/06/21 16:54	1

Surrogate	MB MB		Limits	Prepared	Analyzed	Dil Fac
	%Recovery	Qualifier				
Tetrachloro-m-xylene	94		14 - 128	10/05/21 09:08	10/06/21 16:54	1
DCB Decachlorobiphenyl	123		10 - 132	10/05/21 09:08	10/06/21 16:54	1

Lab Sample ID: LCS 240-506730/14-A
Matrix: Solid
Analysis Batch: 507022

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 506730

Analyte	Spike Added	LCS LCS		Unit	D	%Rec	Limits
		Result	Qualifier				
Aroclor-1016	1000	737		ug/Kg		74	47 - 120
Aroclor-1260	1000	816		ug/Kg		82	46 - 120

Surrogate	LCS LCS		Limits
	%Recovery	Qualifier	
Tetrachloro-m-xylene	68		14 - 128
DCB Decachlorobiphenyl	96		10 - 132

Method: Moisture - Percent Moisture

Lab Sample ID: 240-157284-1 DU
Matrix: Solid
Analysis Batch: 506662

Client Sample ID: UP-1
Prep Type: Total/NA

Analyte	Sample Sample		DU DU		Unit	D	RPD	
	Result	Qualifier	Result	Qualifier			RPD	Limit
Percent Moisture	18.0		19.4		%		8	20

QC Association Summary

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

GC Semi VOA

Prep Batch: 506730

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-157284-1	UP-1	Total/NA	Solid	3540C	
240-157284-2	MID-2	Total/NA	Solid	3540C	
240-157284-3	DN-3	Total/NA	Solid	3540C	
240-157284-4	UP-1 DUP	Total/NA	Solid	3540C	
MB 240-506730/13-A	Method Blank	Total/NA	Solid	3540C	
LCS 240-506730/14-A	Lab Control Sample	Total/NA	Solid	3540C	

Analysis Batch: 507022

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-157284-1	UP-1	Total/NA	Solid	8082A	506730
240-157284-2	MID-2	Total/NA	Solid	8082A	506730
240-157284-3	DN-3	Total/NA	Solid	8082A	506730
240-157284-4	UP-1 DUP	Total/NA	Solid	8082A	506730
MB 240-506730/13-A	Method Blank	Total/NA	Solid	8082A	506730
LCS 240-506730/14-A	Lab Control Sample	Total/NA	Solid	8082A	506730

General Chemistry

Analysis Batch: 506662

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-157284-1	UP-1	Total/NA	Solid	Moisture	
240-157284-2	MID-2	Total/NA	Solid	Moisture	
240-157284-3	DN-3	Total/NA	Solid	Moisture	
240-157284-4	UP-1 DUP	Total/NA	Solid	Moisture	
240-157284-1 DU	UP-1	Total/NA	Solid	Moisture	

Lab Chronicle

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Client Sample ID: UP-1

Date Collected: 09/29/21 10:00

Date Received: 10/01/21 12:00

Lab Sample ID: 240-157284-1

Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	Moisture		1	506662	10/04/21 19:22	AGC	TAL CAN

Client Sample ID: UP-1

Date Collected: 09/29/21 10:00

Date Received: 10/01/21 12:00

Lab Sample ID: 240-157284-1

Matrix: Solid

Percent Solids: 82.0

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	3540C			506730	10/05/21 09:08	TEC	TAL CAN
Total/NA	Analysis	8082A		1	507022	10/06/21 17:37	KMG	TAL CAN

Client Sample ID: MID-2

Date Collected: 09/30/21 08:00

Date Received: 10/01/21 12:00

Lab Sample ID: 240-157284-2

Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	Moisture		1	506662	10/04/21 19:22	AGC	TAL CAN

Client Sample ID: MID-2

Date Collected: 09/30/21 08:00

Date Received: 10/01/21 12:00

Lab Sample ID: 240-157284-2

Matrix: Solid

Percent Solids: 81.5

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	3540C			506730	10/05/21 09:08	TEC	TAL CAN
Total/NA	Analysis	8082A		1	507022	10/06/21 17:52	KMG	TAL CAN

Client Sample ID: DN-3

Date Collected: 09/30/21 15:00

Date Received: 10/01/21 12:00

Lab Sample ID: 240-157284-3

Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	Moisture		1	506662	10/04/21 19:22	AGC	TAL CAN

Client Sample ID: DN-3

Date Collected: 09/30/21 15:00

Date Received: 10/01/21 12:00

Lab Sample ID: 240-157284-3

Matrix: Solid

Percent Solids: 86.2

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	3540C			506730	10/05/21 09:08	TEC	TAL CAN
Total/NA	Analysis	8082A		1	507022	10/06/21 18:07	KMG	TAL CAN

Client Sample ID: UP-1 DUP

Date Collected: 09/29/21 10:00

Date Received: 10/01/21 12:00

Lab Sample ID: 240-157284-4

Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	Moisture		1	506662	10/04/21 19:22	AGC	TAL CAN

Eurofins TestAmerica, Canton

Lab Chronicle

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Client Sample ID: UP-1 DUP

Lab Sample ID: 240-157284-4

Date Collected: 09/29/21 10:00

Matrix: Solid

Date Received: 10/01/21 12:00

Percent Solids: 78.5

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	3540C			506730	10/05/21 09:08	TEC	TAL CAN
Total/NA	Analysis	8082A		1	507022	10/06/21 18:21	KMG	TAL CAN

Laboratory References:

TAL CAN = Eurofins TestAmerica, Canton, 4101 Shuffel Street NW, North Canton, OH 44720, TEL (330)497-9396

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Accreditation/Certification Summary

Client: Ross Incineration Services, Inc.
Project/Site: Dawley Ditch

Job ID: 240-157284-1

Laboratory: Eurofins TestAmerica, Canton

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
California	State	2927	02-23-22
Connecticut	State	PH-0590	12-31-21
Florida	NELAP	E87225	06-30-22
Georgia	State	4062	02-23-22
Illinois	NELAP	200004	07-31-22
Iowa	State	421	06-01-23
Kansas	NELAP	E-10336	04-30-22
Kentucky (UST)	State	112225	02-23-22
Kentucky (WW)	State	KY98016	12-31-21
Minnesota	NELAP	OH00048	12-31-21
Minnesota (Petrofund)	State	3506	08-01-23
New Jersey	NELAP	OH001	06-30-22
New York	NELAP	10975	03-31-22
Ohio VAP	State	CL0024	12-21-23
Oregon	NELAP	4062	02-23-22
Pennsylvania	NELAP	68-00340	08-31-22
Texas	NELAP	T104704517-18-10	08-31-22
Virginia	NELAP	11570	09-14-22
Washington	State	C971	01-12-22
West Virginia DEP	State	210	12-31-21

0.3/0.4

Regulatory Program: DW NPDES RCRA Other:

Client Contact
Ross Incineration Services, Inc.
36790 Giles Road
Grafton, OH 44044
440 748-5845
440 366-3845
Dawley Ditch
RIS
P.O.#

Project Manager: Barbara Kewish
bkewish@rossincineration.com
440 748-5845

Site Contact: B. Kewish
Date: 9/30/2021

Lab Contact: Opal
Carrier:

Analysis Turnaround Time
 CALENDAR DAYS WORKING DAYS
TAT if different from Below _____
 2 weeks
 1 week
 2 days
 1 day

COC No: 1 of 1 COCs
TALS Project #:
Sampler: SK.BK
For Lab Use Only:
Walk-in Client:
Lab Sampling:
Job / SDG No.:

Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=Grab)	# of Cont.	Matrix	Filtered Sample (Y/N)	Perform MS / MSD (Y/N)	PCB 8082	Sample Specific Notes:
Mid-2	9/30/21	8 am	C	2	S	X	X		
Dn-3	9/30/21	3 pm	C	2	S	X	X		
Up-1 DUP	9/29/21	10 am	C	2	S	X	X		



Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other

Possible Hazard Identification: Please List any EPA Waste Codes for the sample in the Are any samples from a listed EPA Hazardous Waste? Yes No

Comments Section if the lab is to dispose of the sample.
 Non-Hazard Flammable Skin Irritant Poison B Unknown

Special Instructions/QC Requirements & Comments:

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
 Return to Client Disposal by Lab Archive for _____ Months

Custody Seal No.: Company: RIS
Relinquished by: Barbara Kewish
Relinquished by: _____
Relinquished by: _____

Cooler Temp. (°C): Obs'd: _____
Received by: _____
Received by: _____
Received in Laboratory by: _____

Therm ID No.: Date/Time: 10/12/21 1200
Date/Time: _____
Date/Time: _____

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Eurofins TestAmerica Canton Sample Receipt Form/Narrative Login # : _____

Canton Facility

Client ROSS Incineration Site Name _____ Cooler unpacked by: Tren

Cooler Received on 10/1/21 Opened on 10/1/21

FedEx: 1st Grd Exp UPS FAS Clipper Client Drop Off TestAmerica Courier Other _____

Receipt After-hours: Drop-off Date/Time _____ **Storage Location** _____

TestAmerica Cooler # TA 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# IR-14 (CF +0.1 °C) Observed Cooler Temp. 0.3 °C Corrected Cooler Temp. 0.4 °C
 IR GUN #IR-15 (CF +0.2 °C) Observed Cooler Temp. _____ °C Corrected Cooler Temp. _____ °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)? Yes No
 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# HC157842
 14. Were VOAs on the COC? Yes No NA
 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 NA
 17. Was a LL Hg or Me Hg trip blank present? _____ Yes No NA

Contacted PM _____ Date _____ by _____ via Verbal Voice Mail Other _____

Concerning _____

Tests that are not checked for pH by Receiving:
VOAs
Oil and Grease
TOC

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: _____

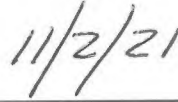
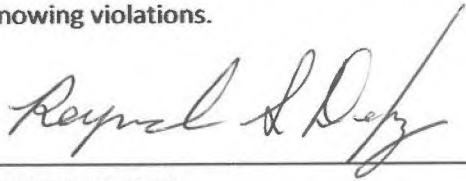
Attachment F

Independent Engineer's Certification

CERTIFICATION OF COMPLETION OF CORRECTIVE MEASURES

Implementation and completion of Corrective Measures for Dawley Ditch at Ross Incineration Services, Inc. were completed in accordance with the requirements of the Ohio Environmental Protection Agency approved Dawley Ditch Exposure Control Plan.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on inquiry of the person or persons who manage the system, or those persons directly responsible for gathering of information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



REYNARD S. DEPUY
THE EDGECLIFF GROUP
25521 EDGECLIFF DRIVE
CLEVELAND, OH 44132-1161
216.261.0582

Date

P.E. STAMP & NO:

