Texas Commission on Environmental Quality

Investigation Report IHW/F1630/IN

LAJITAS RESORT LTD

LAJITAS RESORT

RN100815687

Investigation # 36472 **Incident #** 17876

Investigator: KENT WAGGONER **Site Classification** GENERATOR

Conducted: 04/10/2003 -- 04/10/2003 **SIC Code:** 9999

Program(s): INDUSTRIAL AND HAZARDOUS WASTE GENERATION

Investigation Type : Compliance Investigation **Location :** LAJITAS

Additional ID(s) : F1630

Address: HC 70 BOX 400; LAJITAS, TX 79852 **Activity Type :** IHW COMPLAINT - Complaint investigation

Principal(s) :

Role	Name
RESPONDENT	LAJITAS RESORT LTD

Contact(s) :

Role	Title	Name	Phone	
Participated in Investigation	GOLF COURSE SUPERINTENDENT	MR JAY POCK	Work	(432) 424-3580
Regulated Entity Contact	PRESIDENT	MR RICHARD HUBBLE	Fax Work	(512) 261-0058 (512) 261-5313

Other Staff Member(s) :

Role	Name
SUPERVISOR	TERRY MCMILLAN
QA REVIEWER	TERRY MCMILLAN

Associated Check List

Checklist Name	Unit Name
IHW INVESTIGATION TYPES	1
QUALITY REVIEW - WASTE	1
COMPLAINT INVESTIGATION - IHW	1

100369903

Investigation Comments :

INTRODUCTION
On April 10, 2003, Kent Waggoner, Environmental Investigator, TCEQ El Paso office, accompanied by Mr. Jay Pock, Golf Course Superintendent, conducted a compliance evaluation investigation at the Lajitas Resort Golf Course Maintenance Facility, Lajitas (Brewster County), Texasin response to a complaint. The complaint alleged that the facility was discharging chemicals into Comanche Creek, a tributary of the Rio Grande. An exit interview was conducted with Mr. Pock onsite on investigation date and with Mr. Richard Hubble, President, via telephone, on April 14, 2003. Facility is not listed in TRACS or RCRAINFO.

GENERAL FACILITY AND WASTE PROCESS INFORMATION
Facility is a self contained resort community located along the Rio Grande river. In response to a complaint, it was confirmed that the facility is discharging wash water into the Comanche Creek (dry) from the wash rack. The wash rack is used to wash lawnmowers and other related equipment. The wash rack is a bermed, concrete area that drains into a grate-covered sump located in the center. The sump is connected to an underground PVC pipe that empties into the creek. Significant staining and standing water was noted in the otherwise, dry creek bed.

Discharges (soil staining and hydrocarbon odor) were also noted from an uncovered, 55-gallon container of used oil and a 1,000 gallon above-ground diesel tank both located on soil adjacent to a concrete pad used for the storage of fertilizer and other lawn chemicals.

During the exit interviews, Mr. Pock and Mr. Hubble were informed of the corrective actions required, compliance dates, and our enforcement policy. Per correspondence dated 4/22/03 and 5/7/03, completion of corrective actions is pending additional excavation of contaminated soils and confirmation sampling. Since the correction actions are not yet complete, a notice of violation will be issued.

NOV Date	Method
05/12/2003	WRITTEN

OUTSTANDING ALLEGED VIOLATIONS

Track No: 28238 **Compliance Due Date: 6/12/03**

TWC Chapter 26.121

Alleged Violation:
Investigation: 36472 Comment Date: 05/09/2003

Failure to prevent unauthorized discharges. Facility was discharging wash waters into Comanche Creek (dry) and also allowed discharges of used oil and diesel fuel onto soil.

Recommended Corrective Action: Facility shall ensure that chemical spillage and water from the wash rack and chemical storage area is contained onsite and managed to ensure no discharge to the environment. PVC discharge pipe from wash rack sump will need to be removed or capped and the sump will need to be connnected to the sanitary sewer, pumped out on an as needed basis, or not used. Soil contaminated by wash water, chemicals, used oil and diesel fuel discharges will need to be excavated, properly disposed and appropriate confirmation samples taken to ensure complete remediation. All compliance documentation shall be submitted to this office.

Per correspondence dated 4/22/03 and 5/7/03, completion of corrective actions is pending additional excavation of contaminated soils and confirmation sampling.

Resolution:

Signed Kent Waggoner **Date** 5/12/03
Environmental Investigator

Signed _____ **Date** 5/12/03
Supervisor

Attachments: (in order of final report submittal)

___Enforcement Action Request (EAR)
✓ Letter to Facility (specify type) : NOV
Investigation Report
✓ Sample Analysis Results
___Manifests
___NOR

___Maps, Plans, Sketches
✓ Photographs
✓ Correspondence from the facility
✓ Other (specify) :
Exit report

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 12, 2003

CERTIFIED MAIL 7001 0320 0003 9510 0773
RETURN RECEIPT REQUESTED

Mr. Richard Hubble, President
Lajitas Resort
HC 70 Box 400
Lajitas, TX 79852

Re: Notice of Violation for the Compliance Evaluation Investigation at:
Lajitas Resort, HC 70 Box 400, Lajitas (Brewster County), Texas
Incident/Investigation No. 17876/36472

Dear Mr. Hubble:

On April 10, 2003, Kent Waggoner of the Texas Commission on Environmental Quality (TCEQ) El Paso Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for industrial and hazardous waste in response to a complaint. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by June 12, 2003, a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations.

In the listing of alleged violations, we have cited applicable requirements, including TCEQ rules. If you would like to obtain a copy of the applicable TCEQ rules, you may contact any of the sources listed in the enclosed brochure entitled "Obtaining TCEQ Rules."

The Texas Commission on Environmental Quality appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation(s) documented in this notice. Should you choose to do so, you must notify the El Paso Region Office within 10 days from the date of this letter. At that time, I will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

REPLY TO: REGION 6 • 401 E. FRANKLIN AVE., STE. 560 • EL PASO, TEXAS 79901-1206 • 915/834-4949 • FAX 915/834-4940

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tceq.state.tx.us

If you or members of your staff have any questions, please feel free to contact Mr. Waggoner in the El Paso Region Office at (915) 834-4957.

Sincerely,

Terry L. McMillan
Waste Section Manager
El Paso Region Office

TLM/wkw

Enclosures: Summary of Investigation Findings
Obtaining TCEQ Rules

Summary of Investigation Findings

LAJITAS RESORT
HC 70 BOX 400
LAJITAS, BREWSTER COUNTY, TX 79852
Additional ID(s): F1630

Investigation # 36472
Date: 04/10/2003

OUTSTANDING ALLEGED VIOLATIONS

Track No: 28238 **Compliance Due Date: 6/12/03**

TWC Chapter 26.121

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Per correspondence dated 4/22/03 and 5/7/03, completion of corrective actions is pending additional excavation of contaminated soils and confirmation sampling.

Resolution:

Facility Name	Lajitas Resort
Location	Golf Course Maintenance Facility, Lajitas, Texas
Date	April 10, 2003
Photographer	Kent Waggoner

Photo 1: Discharge into Comanche Creek. Note discharge residue/water and PVC drain pipe.

Photo 2: PVC drain pipe into Comanche Creek. Note liquid dripping from drain pipe.

Photo 3: Discharge into Comanche Creek. Note discharge residue/water.

Photo 4: Wash rack area with evidence of overflow.

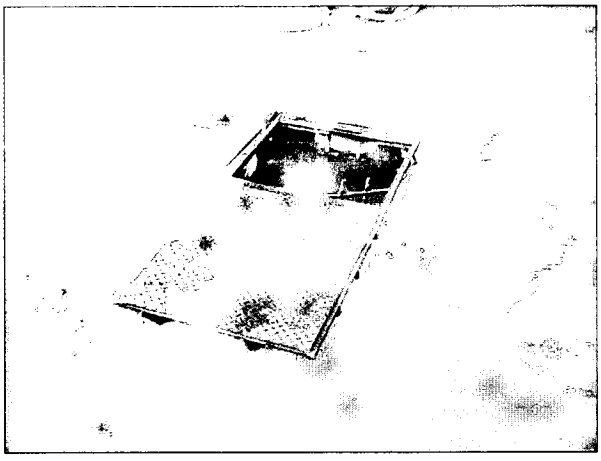

Photo 5: Sump/drain in center of wash rack area.

Photo 6: Chemical storage area. Note yellow discharge onto soil in foreground.

Photo 7: Yellow discharge from chemical storage area. Discharge material contains sulfur.

Photo 8: Discharge of used oil onto soil next to chemical storage area.

Photo 9: Drum of used oil with discharge onto soil.

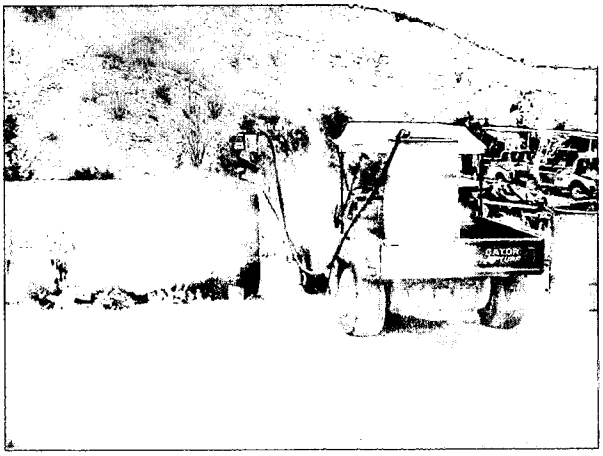

Photo 10: Above ground diesel tank with discharge onto soil.

Photo 11: Discharge of diesel fuel onto soil.

Photo 12: Drums of diesel and used oil with discharge to soil.

Richard Hubble 4/14/03

TCEQ El Paso Region 6 Potential or Alleged Violations Noted and/or Records Request

Regulated Entity Name	Lajitas Resort		**TCEQ I.D No.**		
Investigation Type	Complaint		**EPA I.D. No.**		
Regulated Entity Contact & Title	Jay D. Rock, Golf Course Sup.	**Telephone No.**	424-3580	**Fax No.**	424-3581

NOTE: The information provided in this notice is intended to provide clarity to issues that have arisen to the date of this notice during the above investigation and *does not represent agency findings related to violations.* Any potential or alleged violations discovered after the date of this notice will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in the final investigation report.

Issue		**For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.**	
No.	**Type[1]**	**Rule Citation**	**Description of Issue**
1	AV	26.121	Unauthorized discharge. - Facility shall ensure that all chemicals
		*	water from wash rack & chemical storage area is
			contained onsite & managed to ensure no discharge to
			environment (no discharge sump or connect to sewer system)
			- Remove PCV discharge pipe or cap pipe AND seal
			wash rack discharge unless connection is to sewer.
2	AV	324.1	Cleanup discharge of used oil & other discharge and take confirmation samples
		CFR 279	of used oil discharge & water discharge area in Comanche creek*

No.	**Type[1]**	**Description of Records Requested**	**Date Range**	**Request Date**	**Due Date**	**Reg Ent Contact** *(if different from above)*
		Sample analyses of cleanup/soil &	sample for	fertilizer/pesticides/herbicides		
		prevention of discharge activities				

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), .or RR (Records Request)

Document Acknowledgment. Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

Kent Lunggoner	4/10/03	Jay Rock Jay Rock	4/10/03
TCEQ Investigator Name (Signed & Printed) 401 E. Franklin, Suite 560, El Paso, Texas 79901 Phone: 915/834-4949 Fax: 915-834-4940	**Date**	**Regulated Entity Representative Name (Signed & Printed)**	**Date**

(Note: use additional pages as necessary) **Page** 1 **of** 1

* to ensure contamination has been remediated.

36472

COPIES: White: for Regulated Entity Representative Yellow: Agency Copy

soil
used oil
fertilizer
golf course
outdoor Chemical storage
Bldg
asphalt
Wash rack
soil
Creek

Wash rack
Comache Creek

From: Muhammadali Abbaszadeh
To: Waggoner, Kent
Date: 5/8/03 11:34AM
Subject: Re: Another F number

The assigned F# for this facility is **1630**

Muhammadali Abbaszadeh
Health Physicist/Border, UIC, & Rad Waste Liaison
Texas Commission on Environmental Quality(TCEQ)
Waste & ER Program Support Section
Field Operations Division--Central Office
mabbasza@tceq.state.tx.us
512/239-6078

>>> Kent Waggoner 05/08/03 11:59AM >>>
Please send a F number for

Lajitas Resort, Ltd.
HC 70 Box 400
Lajitas, TX 79852 (Brewster County)

Thanks,

W. Kent Waggoner, P.G.
Environmental Investigator
Texas Commission on Environmental Quality
401 E. Franklin Ave., Suite 560
El Paso, Texas 79901
Office: (915) 834-4949 Fax: (915) 834-4940
kwaggone@tceq.state.tx.us

Kent Waggoner - Lajitas golf maintenance facility NOV

From: "Richard Hubble" <rhubble@srsmanagement.com>
To: <kwaggone@tceq.state.tx.us>
Date: 4/22/03 6:49 PM
Subject: Lajitas golf maintenance facility NOV

Kent,
This email is to update you on our progress with the items you noted on your NOV dated April 10,2003 relative to the golf maintenance shop in Lajitas, Texas.
1. The PVC drain line from the wash rack has been capped and the contaminated soil has been removed and properly disposed of. Soil samples have been taken and forwarded to Severn Trent Labs for confirmation. We expect the results from the lab within 10 days.
2. Cleaned up discharge from used oil drum and removed drum to recycle oil recycle center in Terlingua. Sampled soil at previously contaminated area and forwarded sample to Severn Trent Labs fo confirmation. We expect the results from the lab within 10 days.
3. We moved the diesel storage tank and batteries onto the asphalt and cleaned up the contaminated soil. Again the confirmation soil samples are at the Lab and we expect results within 10 days.
Please feel free to call with any questions or further requirements. We will send copies of the test results as soon as we receive them.
Richard Hubble
2101 Lakeway Blvd.
Austin, Texas 78734
512/261-5313
fax 261-0058
rhubble@srsmanagement.com

Kent Waggoner - FW: Lajitas Golf Course

From: "Richard Hubble" <rhubble@srsmanagement.com>
To: "Kent Waggoner" <KWAGGONE@tceq.state.tx.us>
Date: 5/7/03 3:36 PM
Subject: FW: Lajitas Golf Course
CC: "Gavin Heap" <gheap@lajitas.com>, "Daniel Hostettler"

Kent,
It looks like we will have to do some more clean on one location and retest. I will send you the ressults when we get them back. I expect it to be about three or four weeks to get the sample sent in and retested.
Please call or email if you have any questions.
Richard Hubble

-----Original Message-----
From: mloeb@stl-inc.com [mailto:mloeb@stl-inc.com]
Sent: Wed 5/7/2003 3:33 PM
To: Richard Hubble
Cc: mroetzel@capeenv.com
Subject: RE: Lajitas Golf Course

Richard,

I have attached to files to this email. One is results for the soils analyzed for pesticides, Herbicides and TPH. The only place you have a hit is the sample identified as drum by the wall. Looks like both Motor Oil and Diesel. Hardcopy report should be in the mail shortly.

The second file is a copy of a COC for samples received today. I was under the impression someone had talked with Mac and explained what needed to be sampled. I am not sure (based on the COC) which sampling point(s) the containers that I received today are supposed to represent. When you or Mark have a chance to review, Let me know if you can explain to me.

Thanks in advance!!

MJL
Mark J. Loeb
Project Manager
STL St. Louis
(314) 298-8566
(314) 298-8757
mloeb@stl-inc.com

-----Original Message-----
From: Richard Hubble [mailto:rhubble@srsmanagement.com]
Sent: Tuesday, April 29, 2003 8:29 AM
To: Loeb, Mark
Subject: RE: Lajitas Golf Course

Thanks, Mark.
Hubble

-----Original Message-----
From: mloeb@stl-inc.com [mailto:mloeb@stl-inc.com]
Sent: Tuesday, April 29, 2003 8:29 AM

To: Richard Hubble
Subject: RE: Lajitas Golf Course

Richard - The project is scheduled for completion early next week. I will be able to email the complete report or preliminary data once it is available. At this point, all analyses have been extracted, but only pesticides have completed.

MJL

-----Original Message-----
From: Richard Hubble [mailto:rhubble@srsmanagement.com]
Sent: Monday, April 28, 2003 5:50 PM
To: Loeb, Mark
Subject: RE: Lajitas Golf Course
Mark,
Can you tell me when to expect the results?
Hubble

-----Original Message-----
From: mloeb@stl-inc.com [mailto:mloeb@stl-inc.com]
Sent: Wednesday, April 23, 2003 9:01 AM
To: Richard Hubble
Subject: RE: Lajitas Golf Course

Richard,
We can test for the TPH, Pesticides and Herbicides. We have never tested for Fertilizers.
What do you want us to do at this point?
We were logging as follows:
"Wash System" to be analyzed for Herbicides.
"Shop Drums", "Fuel Tank" and "Drum by Wall" for TPH.
Based on this email, I will add Pesticides to the "Wash System" sample.
I do not know what to do for the fertilizer request.
Let me know if this will suffice for TCEQ?
Thanks,
MJL
Mark J. Loeb
Project Manager
STL St. Louis
(314) 298-8566
(314) 298-8757
mloeb@stl-inc.com

-----Original Message-----
From: Richard Hubble [mailto:rhubble@srsmanagement.com]
Sent: Tuesday, April 22, 2003 7:45 PM
To: Loeb, Mark
Subject: RE: Lajitas Golf Course

Mark,
I am not sure what all of these initials mean, but the TCEQ inspector said that we need to test for TPH at the diesel and oil drum samples and for fertilizers, pesticides, and herbicides in the sample at the wash rack.
Thanks.
Hubble

-----Original Message-----
From: mloeb@stl-inc.com [mailto:mloeb@stl-inc.com]

Sent: Tue 4/22/2003 9:33 AM
To: Richard Hubble
Cc:
Subject: Lajitas Golf Course

Richard,

STL St. Louis received 4 ziploc bags filled with soil today. COC lists exactly that.. 3 sacks and 1 sack. Take a look at the pdf attachment please.

I have written the IDs that were on the bags on the COC.

For Petroleum analysis.. are we looking for just an 8015 DRO type analysis?

- are we analyzing each bag as a separate sample?

For the Herbicide.. standard 8151? Can I assume that is the "Maint. Shop Wash System" sample?
Let me know when you get a chance.
<<image.pdf>>
Thanks,
MJL

Mark J. Loeb
Project Manager
STL St. Louis
(314) 298-8566
(314) 298-8757
mloeb@stl-inc.com

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Chain of Custody Record

SEVERN TRENT SERVICES — Severn Trent Laboratories, Inc.

STL-4124 (0901)

Client	Project Manager	Date	Chain of Custody Number
LAJITAS Utility Co. Inc (LUCI)	Mark Roetzel	050603	
Address	**Telephone Number (Area Code)/Fax Number**	**Lab Number**	**Page ____ of ____**
HC. 70, Box 400	210/377 2008		
City / **State** / **Zip Code**	**Site Contact**	**Lab Contact**	
LAJITAS / TX / 79852	Mac Morrow	Mark Loeb	
Project Name and Location (State)	**Carrier/Waybill Number**		
L.U. CI, TX			
Contract/Purchase Order/Quote No.			
Verbal R. Hubble			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	Containers & Preservatives: Unpres.	H2SO4	HNO3	HCl	NaOH	ZnAc/NaOH	Analysis: Gross Alpha/Beta	Metals	Radium 226/228	Total Uranium	Waterchem	pH	TDS	Radium 226/228	Special Instructions/ Conditions of Receipt
Sample #1, #2, #3	050603	0700		✓				3					3								
Sample #4	050603	0700		✓				1						1							
Sample #5, #6, #7, #8, #9, #10	050603	0700		✓				6							6						
Sample #11, #12, #13	050603	0700		✓				3								3					
Sample #14	050603	0700		✓				1									1				
Sample #15, #16	050603	0700		✓				2										2			
Sample #17	050603	0700		✓				1											1		
Sample #18	050503	0830			✓			1												1	

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal
☐ Return To Client ☑ Disposal By Lab ☐ Archive For ____ Months (A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☐ 7 Days ☐ 14 Days ☐ 21 Days ☑ Other ASAP

QC Requirements (Specify)

	Date	Time		Date	Time
1. Relinquished By			1. Received By Kris Akers	5.7.03	0830
2. Relinquished By			2. Received By		
3. Relinquished By			3. Received By		

Comments: All H_2O samples were Taken in the 3 waste streams going To waste Tank Ambient Temp 42.4 °C

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

SEVERN TRENT STL

ANALYTICAL REPORT

Lajitas Golf Course

Lot #: F3D230184

Mark Roetzel

Cape Environmental Management
Blossom Business Center
12037 Star Crest Drive
San Antonio, TX 78247

SEVERN TRENT LABORATORIES, INC.

Mark J. Loeb
Project Manager

May 6, 2003

Severn Trent Laboratories, Inc.
STL St. Louis • 13715 Rider Trail North, Earth City, MO 63045
Tel 314 298 8566 Fax 314 298 8757 • *www.stl-inc.com*

Case Narrative
LOT NUMBER: **F3D230184**

This report contains the analytical results for the four samples received under chain of custody by STL St. Louis on April 22, 2003. These samples are associated with your Lajitas Golf Course project.

All applicable quality control procedures met method-specified acceptance criteria except as noted on the following page.

This report is incomplete without the case narrative. All chemical analysis results are based upon sample as received, wet weight, unless noted otherwise. All radiochemistry results are based upon sample as dried and ground with the exception of tritium, unless requested wet weight by the client.

Observations/Nonconformances

Reference the chain of custody and condition upon receipt report for any variations on receipt conditions and temperature of samples on receipt.

TPH Extractable

The sample would only concentrate to 1.5 ml.

Affected Samples:
F3D230184 (4): DRUM BY WALL

The Method Blank surrogate recovery is outside acceptance limits. The samples associated with this method blank demonstrated acceptable surrogate recoveries indicating the surrogate excursion is isolated to the method blank and not indicative of the batch. Sample results are reported with this narrative.

Affected Samples:
F3D230184 (2): G.C. SHOP DRUMS
F3D230184 (3): FUEL TANK
F3D230184 (4): DRUM BY WALL

The following sample was analyzed at two different concentration levels. The original analysis had high surrogate recovery due to a matrix interference. The sample was analyzed at a dilution due to high concentrations of target analytes. Surrogates could not be reported from the dilution run.

Affected Samples:
F3D230184 (4): DRUM BY WALL

Herbicides Method 8151A

The Laboratory Control Sample Dinoseb recovery is outside the lower QC limit, indicating a potential negative bias for this analyte. The associated samples were reprepared and reanalyzed. Results of the reanalysis yielded an acceptable result. Results are provided with this narrative.

The Batch QC MS and MSD recovery for Dalapon and Dinoseb is outside the established lower QC limits. Samples were reprepared and reanalyzed. The reanalysis yielded acceptable results. Results are provided with this narrative.

Affected Samples:
F3D230184 (1): MAINTENANCE WASH SYSTEM

METHODS SUMMARY

F3D230184

PARAMETER	ANALYTICAL METHOD	PREPARATION METHOD
Chlorinated Herbicides by GC	SW846 8151A	SW846 8151A
Extractable Petroleum Hydrocarbons	SW846 8015 MOD	SW846 3550
Organochlorine Pesticides	SW846 8081A	SW846 3550
Percent Moisture	MCAWW 160.3 MOD	MCAWW 160.3 MOD

References:

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

F3D230184

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
FMFAX	001	MAINTENANCE WASH SYSTEM	04/21/03	10:25
FMFA5	002	G.C. SHOP DRUMS	04/21/03	09:55
FMFA8	003	FUEL TANK	04/21/03	09:55
FMFA9	004	DRUM BY WALL	04/21/03	09:55

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

LAJITAS UTILITY COMPANY

Client Sample ID: MAINTENANCE WASH SYSTEM

GC Semivolatiles

Lot-Sample #...: F3D230184-001 **Work Order #...:** FMFAX1AD **Matrix.....:** SOLID
Date Sampled...: 04/21/03 10:25 **Date Received..:** 04/22/03
Prep Date.....: 04/24/03 **Analysis Date..:** 04/25/03
Prep Batch #...: 3114339 **Analysis Time..:** 23:41
Dilution Factor: 1
% Moisture.....: 26 **Method.....:** SW846 8081A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Heptachlor	ND	2.3	ug/kg
Heptachlor epoxide	ND	2.3	ug/kg
Toxaphene	ND	90	ug/kg
Aldrin	ND	2.3	ug/kg
alpha-BHC	ND	2.3	ug/kg
beta-BHC	ND	2.3	ug/kg
delta-BHC	ND	2.3	ug/kg
gamma-BHC (Lindane)	ND	2.3	ug/kg
4,4'-DDD	ND	2.3	ug/kg
4,4'-DDE	ND	2.3	ug/kg
4,4'-DDT	ND	2.3	ug/kg
Dieldrin	ND	2.3	ug/kg
Endosulfan I	ND	2.3	ug/kg
Endosulfan II	ND	2.3	ug/kg
Endosulfan sulfate	ND	2.3	ug/kg
Endrin	ND	2.3	ug/kg
Chlordane (technical)	ND	23	ug/kg
Endrin aldehyde	ND	2.3	ug/kg
Endrin ketone	ND	2.3	ug/kg
Methoxychlor	ND	4.5	ug/kg

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	65	(18 - 150)
Decachlorobiphenyl	80	(30 - 150)

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

LAJITAS UTILITY COMPANY

Client Sample ID: MAINTENANCE WASH SYSTEM

GC Semivolatiles

Lot-Sample #...: F3D230184-001 **Work Order #...:** FMFAX1AC **Matrix.....:** SOLID
Date Sampled...: 04/21/03 10:25 **Date Received..:** 04/22/03
Prep Date.....: 04/28/03 **Analysis Date..:** 05/01/03
Prep Batch #...: 3118243 **Analysis Time..:** 11:49
Dilution Factor: 1
% Moisture.....: 26 **Method.....:** SW846 8151A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
2,4-D	ND	110	ug/kg
2,4-DB	ND	110	ug/kg
2,4,5-TP (Silvex)	ND	27	ug/kg
2,4,5-T	ND	27	ug/kg
Dalapon	ND	54	ug/kg
Dicamba	ND	54	ug/kg
Dichlorprop	ND	110	ug/kg
Dinoseb	ND	16	ug/kg
MCPA	ND	11000	ug/kg
MCPP	ND	11000	ug/kg

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2,4-Dichlorophenylacetic acid	33	(10 - 150)

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

LAJITAS UTILITY COMPANY

Client Sample ID: MAINTENANCE WASH SYSTEM

GC Semivolatiles

Lot-Sample #...: F3D230184-001 **Work Order #...:** FMFAX2AC **Matrix.....:** SOLID
Date Sampled...: 04/21/03 10:25 **Date Received..:** 04/22/03
Prep Date.....: 05/01/03 **Analysis Date..:** 05/05/03
Prep Batch #...: 3121500 **Analysis Time..:** 13:06
Dilution Factor: 1
% Moisture.....: 26 **Method.....:** SW846 8151A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
2,4-D	ND	110	ug/kg
2,4-DB	ND	110	ug/kg
2,4,5-TP (Silvex)	ND	27	ug/kg
2,4,5-T	ND	27	ug/kg
Dalapon	ND	54	ug/kg
Dicamba	ND	54	ug/kg
Dichlorprop	ND	110	ug/kg
Dinoseb	ND	16	ug/kg
MCPA	ND	11000	ug/kg
MCPP	ND	11000	ug/kg

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2,4-Dichlorophenylacetic acid	67	(10 - 150)

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

LAJITAS UTILITY COMPANY

Client Sample ID: MAINTENANCE WASH SYSTEM

General Chemistry

Lot-Sample #...: F3D230184-001 **Work Order #...:** FMFAX **Matrix.....:** SOLID
Date Sampled...: 04/21/03 10:25 **Date Received..:** 04/22/03
% Moisture.....: 26

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Moisture	**25.9**	**0.10**	**%**	**MCAWW 160.3 MOD**	**04/23-04/24/03**	**3113389**

Dilution Factor: 1 Analysis Time..: 00:04

LAJITAS UTILITY COMPANY

Client Sample ID: G.C. SHOP DRUMS

GC Semivolatiles

Lot-Sample #...: F3D230184-002 **Work Order #...:** FMFA51AA **Matrix.....:** SOLID
Date Sampled...: 04/21/03 09:55 **Date Received..:** 04/22/03
Prep Date.....: 04/25/03 **Analysis Date..:** 05/01/03
Prep Batch #...: 3115205 **Analysis Time..:** 09:26
Dilution Factor: 1
% Moisture.....: 8.6 **Method.....:** SW846 8015 MOD

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Kerosene	ND	27	mg/kg
TPH (as Diesel)	ND	27	mg/kg
TPH (as Motor Oil)	ND	27	mg/kg

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
o-Terphenyl	77	(10 - 150)

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

LAJITAS UTILITY COMPANY

Client Sample ID: G.C. SHOP DRUMS

General Chemistry

Lot-Sample #...: F3D230184-002 **Work Order #...:** FMFA5 **Matrix.....:** SOLID
Date Sampled...: 04/21/03 09:55 **Date Received..:** 04/22/03
% Moisture.....: 8.6

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Moisture	**8.6**	**0.10**	**%**	**MCAWW 160.3 MOD**	**04/24-04/25/03**	**3114314**
		Dilution Factor: 1		Analysis Time..: 00:04		

LAJITAS UTILITY COMPANY

Client Sample ID: FUEL TANK

GC Semivolatiles

Lot-Sample #...:	F3D230184-003	**Work Order #...:**	FMFA81AA	**Matrix.....:**	SOLID
Date Sampled...:	04/21/03 09:55	**Date Received..:**	04/22/03		
Prep Date.....:	04/25/03	**Analysis Date..:**	05/01/03		
Prep Batch #...:	3115205	**Analysis Time..:**	10:32		
Dilution Factor:	1				
% Moisture.....:	5.5	**Method.....:**	SW846 8015 MOD		

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Kerosene	ND	26	mg/kg
TPH (as Diesel)	ND	26	mg/kg
TPH (as Motor Oil)	ND	26	mg/kg

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
o-Terphenyl	74	(10 - 150)

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

LAJITAS UTILITY COMPANY

Client Sample ID: FUEL TANK

General Chemistry

Lot-Sample #...: F3D230184-003 **Work Order #...:** FMFA8 **Matrix.....:** SOLID
Date Sampled...: 04/21/03 09:55 **Date Received..:** 04/22/03
% Moisture.....: 5.5

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Moisture	**5.5**	**0.10**	**%**	**MCAWW 160.3 MOD**	**04/24-04/25/03**	**3114314**

Dilution Factor: 1 Analysis Time..: 00:04

LAJITAS UTILITY COMPANY

Client Sample ID: DRUM BY WALL

GC Semivolatiles

Lot-Sample #...:	F3D230184-004	**Work Order #...:**	FMFA91AA	**Matrix.....:**	SOLID
Date Sampled...:	04/21/03 09:55	**Date Received..:**	04/22/03		
Prep Date.....:	04/25/03	**Analysis Date..:**	05/01/03		
Prep Batch #...:	3115205	**Analysis Time..:**	11:15		
Dilution Factor:	1				
% Moisture.....:	15	**Method.....:**	SW846 8015 MOD		

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Kerosene	ND	29	mg/kg
TPH (as Diesel)	**3500 E**	**29**	**mg/kg**
TPH (as Motor Oil)	**8900 E**	**29**	**mg/kg**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
o-Terphenyl	1410 *	(10 - 150)

NOTE(S):

* Surrogate recovery is outside stated control limits.

Results and reporting limits have been adjusted for dry weight.

E Estimated result. Result concentration exceeds the calibration range.

LAJITAS UTILITY COMPANY

Client Sample ID: DRUM BY WALL

GC Semivolatiles

Lot-Sample #...:	F3D230184-004	**Work Order #...:**	FMFA92AA	**Matrix.....:**	SOLID
Date Sampled...:	04/21/03 09:55	**Date Received..:**	04/22/03		
Prep Date.....:	04/25/03	**Analysis Date..:**	05/01/03		
Prep Batch #...:	3115205	**Analysis Time..:**	10:53		
Dilution Factor:	50				
% Moisture.....:	15	**Method.....:**	SW846 8015 MOD		

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Kerosene	ND	1500	mg/kg
TPH (as Diesel)	**3800 D**	**1500**	**mg/kg**
TPH (as Motor Oil)	**25000 D**	**1500**	**mg/kg**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
o-Terphenyl	0.0 DIL,*	(10 - 150)

NOTE(S):

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

* Surrogate recovery is outside stated control limits.

Results and reporting limits have been adjusted for dry weight.

D Result was obtained from the analysis of a dilution.

LAJITAS UTILITY COMPANY

Client Sample ID: DRUM BY WALL

General Chemistry

Lot-Sample #...: F3D230184-004 **Work Order #...:** FMFA9 **Matrix.....:** SOLID
Date Sampled...: 04/21/03 09:55 **Date Received..:** 04/22/03
% Moisture.....: 15

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Moisture	**15.2**	**0.10**	**%**	**MCAWW 160.3 MOD**	**04/24-04/25/03**	**3114314**

Dilution Factor: 1 Analysis Time..: 00:04

METHOD BLANK REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FMKEL1AA **Matrix.....:** SOLID
MB Lot-Sample #: F3D250000-205

Prep Date.....: 04/25/03 **Analysis Time..:** 08:43
Analysis Date..: 05/01/03 **Prep Batch #...:** 3115205
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Kerosene	ND	25	mg/kg	SW846 8015 MOD
TPH (as Diesel)	ND	25	mg/kg	SW846 8015 MOD
TPH (as Motor Oil)	ND	25	mg/kg	SW846 8015 MOD

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
o-Terphenyl	70	(10 - 150)

NOTE(S):

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

METHOD BLANK REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FMHPE1AA **Matrix.....:** SOLID
MB Lot-Sample #: F3D240000-339

Prep Date.....: 04/24/03 **Analysis Time..:** 22:53
Analysis Date..: 04/25/03 **Prep Batch #...:** 3114339
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Heptachlor	ND	1.7	ug/kg	SW846 8081A
Heptachlor epoxide	ND	1.7	ug/kg	SW846 8081A
Toxaphene	ND	67	ug/kg	SW846 8081A
Aldrin	ND	1.7	ug/kg	SW846 8081A
alpha-BHC	ND	1.7	ug/kg	SW846 8081A
beta-BHC	ND	1.7	ug/kg	SW846 8081A
delta-BHC	ND	1.7	ug/kg	SW846 8081A
gamma-BHC (Lindane)	ND	1.7	ug/kg	SW846 8081A
4,4'-DDD	ND	1.7	ug/kg	SW846 8081A
4,4'-DDE	ND	1.7	ug/kg	SW846 8081A
4,4'-DDT	ND	1.7	ug/kg	SW846 8081A
Dieldrin	ND	1.7	ug/kg	SW846 8081A
Endosulfan I	ND	1.7	ug/kg	SW846 8081A
Endosulfan II	ND	1.7	ug/kg	SW846 8081A
Endosulfan sulfate	ND	1.7	ug/kg	SW846 8081A
Endrin	ND	1.7	ug/kg	SW846 8081A
Chlordane (technical)	ND	17	ug/kg	SW846 8081A
Endrin aldehyde	ND	1.7	ug/kg	SW846 8081A
Endrin ketone	ND	1.7	ug/kg	SW846 8081A
Methoxychlor	ND	3.3	ug/kg	SW846 8081A

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	76	(18 - 150)
Decachlorobiphenyl	83	(30 - 150)

NOTE(S):

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

METHOD BLANK REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FMN0N1AA **Matrix.....:** SOLID
MB Lot-Sample #: F3D280000-243

Prep Date.....: 04/28/03 **Analysis Time..:** 10:40
Analysis Date..: 05/01/03 **Prep Batch #...:** 3118243
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
2,4-D	ND	80	ug/kg	SW846 8151A
2,4-DB	ND	80	ug/kg	SW846 8151A
2,4,5-TP (Silvex)	ND	20	ug/kg	SW846 8151A
2,4,5-T	ND	20	ug/kg	SW846 8151A
Dalapon	ND	40	ug/kg	SW846 8151A
Dicamba	ND	40	ug/kg	SW846 8151A
Dichlorprop	ND	80	ug/kg	SW846 8151A
Dinoseb	ND	12	ug/kg	SW846 8151A
MCPA	ND	8000	ug/kg	SW846 8151A
MCPP	ND	8000	ug/kg	SW846 8151A

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2,4-Dichlorophenylacetic acid	25	(10 - 150)

NOTE(S):

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

METHOD BLANK REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FM0N11AA **Matrix.....:** SOLID
MB Lot-Sample #: F3E010000-500

Prep Date.....: 05/01/03 **Analysis Time..:** 11:56
Analysis Date..: 05/05/03 **Prep Batch #...:** 3121500
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
2,4-D	ND	80	ug/kg	SW846 8151A
2,4-DB	ND	80	ug/kg	SW846 8151A
2,4,5-TP (Silvex)	ND	20	ug/kg	SW846 8151A
2,4,5-T	ND	20	ug/kg	SW846 8151A
Dalapon	ND	40	ug/kg	SW846 8151A
Dicamba	ND	40	ug/kg	SW846 8151A
Dichlorprop	ND	80	ug/kg	SW846 8151A
Dinoseb	ND	12	ug/kg	SW846 8151A
MCPA	ND	8000	ug/kg	SW846 8151A
MCPP	ND	8000	ug/kg	SW846 8151A

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2,4-Dichlorophenylacetic acid	88	(10 - 150)

NOTE(S):

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

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FMKEL1AC **Matrix.....:** SOLID
LCS Lot-Sample#: F3D250000-205
Prep Date.....: 04/25/03 **Analysis Date..:** 05/01/03
Prep Batch #...: 3115205 **Analysis Time..:** 09:05
Dilution Factor: 1

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD
TPH (as Diesel)	**71**	**(41 - 115)**	**SW846 8015 MOD**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
o-Terphenyl	115	(75 - 150)

NOTE(S):

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

Bold print denotes control parameters

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FMHPE1AC **Matrix.....:** SOLID
LCS Lot-Sample#: F3D240000-339
Prep Date.....: 04/24/03 **Analysis Date..:** 04/25/03
Prep Batch #...: 3114339 **Analysis Time..:** 23:17
Dilution Factor: 1

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD
Heptachlor	**89**	**(33 - 150)**	**SW846 8081A**
Heptachlor epoxide	**87**	**(40 - 150)**	**SW846 8081A**
Aldrin	**86**	**(29 - 148)**	**SW846 8081A**
alpha-BHC	**91**	**(30 - 141)**	**SW846 8081A**
beta-BHC	**83**	**(41 - 143)**	**SW846 8081A**
delta-BHC	**91**	**(10 - 127)**	**SW846 8081A**
gamma-BHC (Lindane)	**89**	**(37 - 145)**	**SW846 8081A**
4,4'-DDD	**90**	**(41 - 150)**	**SW846 8081A**
4,4'-DDE	**88**	**(36 - 150)**	**SW846 8081A**
4,4'-DDT	**98**	**(37 - 150)**	**SW846 8081A**
Dieldrin	**92**	**(40 - 151)**	**SW846 8081A**
Endosulfan I	**71**	**(39 - 144)**	**SW846 8081A**
Endosulfan II	**80**	**(41 - 146)**	**SW846 8081A**
Endosulfan sulfate	**82**	**(33 - 138)**	**SW846 8081A**
Endrin	**94**	**(41 - 150)**	**SW846 8081A**
alpha-Chlordane	**89**	**(40 - 146)**	**SW846 8081A**
gamma-Chlordane	**87**	**(42 - 146)**	**SW846 8081A**
Endrin aldehyde	**71**	**(29 - 140)**	**SW846 8081A**
Endrin ketone	**86**	**(32 - 150)**	**SW846 8081A**
Methoxychlor	**96**	**(37 - 150)**	**SW846 8081A**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	92	(22 - 150)
Decachlorobiphenyl	93	(47 - 150)

NOTE(S):

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

Bold print denotes control parameters

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FMN0N1AC **Matrix.....:** SOLID
LCS Lot-Sample#: F3D280000-243
Prep Date.....: 04/28/03 **Analysis Date..:** 05/01/03
Prep Batch #...: 3118243 **Analysis Time..:** 11:15
Dilution Factor: 1

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD
2,4-D	**34**	**(10 - 150)**	**SW846 8151A**
2,4-DB	**43**	**(10 - 150)**	**SW846 8151A**
2,4,5-TP (Silvex)	**56**	**(10 - 150)**	**SW846 8151A**
2,4,5-T	**41**	**(10 - 150)**	**SW846 8151A**
Dalapon	**15**	**(10 - 150)**	**SW846 8151A**
Dicamba	**61**	**(10 - 150)**	**SW846 8151A**
Dichlorprop	**52**	**(10 - 150)**	**SW846 8151A**
Dinoseb	**8.1 a**	**(10 - 150)**	**SW846 8151A**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2,4-Dichlorophenylacetic acid	52	(10 - 150)

NOTE(S):

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

Bold print denotes control parameters

a Spiked analyte recovery is outside stated control limits.

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FM0N11AC **Matrix.....:** SOLID
LCS Lot-Sample#: F3E010000-500
Prep Date.....: 05/01/03 **Analysis Date..:** 05/05/03
Prep Batch #...: 3121500 **Analysis Time..:** 12:31
Dilution Factor: 1

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD
2,4-D	**52**	**(10 - 150)**	**SW846 8151A**
2,4-DB	**52**	**(10 - 150)**	**SW846 8151A**
2,4,5-TP (Silvex)	**73**	**(10 - 150)**	**SW846 8151A**
2,4,5-T	**63**	**(10 - 150)**	**SW846 8151A**
Dalapon	**31**	**(10 - 150)**	**SW846 8151A**
Dicamba	**84**	**(10 - 150)**	**SW846 8151A**
Dichlorprop	**68**	**(10 - 150)**	**SW846 8151A**
Dinoseb	**18**	**(10 - 150)**	**SW846 8151A**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2,4-Dichlorophenylacetic acid	69	(10 - 150)

NOTE(S):

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

Bold print denotes control parameters

MATRIX SPIKE SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...:	F3D230184	**Work Order #...:**	FMFA51AD-MS	**Matrix.....:**	SOLID
MS Lot-Sample #:	F3D230184-002		FMFA51AE-MSD		
Date Sampled...:	04/21/03 09:55	**Date Received..:**	04/22/03		
Prep Date.....:	04/25/03	**Analysis Date..:**	05/01/03		
Prep Batch #...:	3115205	**Analysis Time..:**	09:48		
Dilution Factor:	1	**% Moisture.....:**	8.6		

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
TPH (as Diesel)	**79**	**(10 - 150)**			**SW846 8015 MOD**
	77	**(10 - 150)**	**2.3**	**(0-30)**	**SW846 8015 MOD**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
o-Terphenyl	127	(10 - 150)
	124	(10 - 150)

NOTE(S):

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

Bold print denotes control parameters

Results and reporting limits have been adjusted for dry weight.

MATRIX SPIKE SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FMFAX1AE-MS **Matrix.....:** SOLID
MS Lot-Sample #: F3D230184-001 FMFAX1AF-MSD
Date Sampled...: 04/21/03 10:25 **Date Received..:** 04/22/03
Prep Date.....: 04/24/03 **Analysis Date..:** 04/26/03
Prep Batch #...: 3114339 **Analysis Time..:** 00:05
Dilution Factor: 1 **% Moisture.....:** 26

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Heptachlor	86	(35 - 149)			SW846 8081A
	82	(35 - 149)	5.0	(0-30)	SW846 8081A
Heptachlor epoxide	86	(46 - 134)			SW846 8081A
	83	(46 - 134)	3.5	(0-30)	SW846 8081A
Aldrin	86	(43 - 122)			SW846 8081A
	82	(43 - 122)	5.0	(0-30)	SW846 8081A
alpha-BHC	89	(44 - 116)			SW846 8081A
	85	(44 - 116)	5.5	(0-30)	SW846 8081A
beta-BHC	83	(49 - 130)			SW846 8081A
	80	(49 - 130)	3.7	(0-30)	SW846 8081A
delta-BHC	91	(23 - 100)			SW846 8081A
	87	(23 - 100)	4.0	(0-30)	SW846 8081A
gamma-BHC (Lindane)	89	(48 - 123)			SW846 8081A
	85	(48 - 123)	5.5	(0-30)	SW846 8081A
4,4'-DDD	88	(41 - 146)			SW846 8081A
	83	(41 - 146)	4.9	(0-30)	SW846 8081A
4,4'-DDE	88	(33 - 150)			SW846 8081A
	85	(33 - 150)	3.5	(0-30)	SW846 8081A
4,4'-DDT	100	(31 - 150)			SW846 8081A
	88	(31 - 150)	12	(0-30)	SW846 8081A
Dieldrin	89	(43 - 139)			SW846 8081A
	85	(43 - 139)	4.8	(0-30)	SW846 8081A
Endosulfan I	73	(42 - 129)			SW846 8081A
	68	(42 - 129)	6.0	(0-30)	SW846 8081A
Endosulfan II	74	(47 - 133)			SW846 8081A
	71	(47 - 133)	4.1	(0-30)	SW846 8081A
Endosulfan sulfate	70	(37 - 126)			SW846 8081A
	68	(37 - 126)	1.7	(0-30)	SW846 8081A
Endrin	92	(47 - 145)			SW846 8081A
	88	(47 - 145)	4.7	(0-30)	SW846 8081A
alpha-Chlordane	88	(16 - 150)			SW846 8081A
	87	(16 - 150)	1.4	(0-30)	SW846 8081A
gamma-Chlordane	89	(27 - 150)			SW846 8081A
	85	(27 - 150)	4.1	(0-30)	SW846 8081A
Endrin aldehyde	61	(33 - 125)			SW846 8081A
	58	(33 - 125)	5.1	(0-30)	SW846 8081A
Endrin ketone	75	(45 - 150)			SW846 8081A
	72	(45 - 150)	4.1	(0-30)	SW846 8081A
Methoxychlor	90	(41 - 150)			SW846 8081A
	82	(41 - 150)	9.8	(0-30)	SW846 8081A

(Continued on next page)

MATRIX SPIKE SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FMFAX1AE-MS **Matrix.....:** SOLID
MS Lot-Sample #: F3D230184-001 FMFAX1AF-MSD

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	83	(18 - 150)
	83	(18 - 150)
Decachlorobiphenyl	83	(30 - 150)
	81	(30 - 150)

NOTE(S):

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

Bold print denotes control parameters

Results and reporting limits have been adjusted for dry weight.

MATRIX SPIKE SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FMFAX1AG-MS **Matrix.....:** SOLID
MS Lot-Sample #: F3D230184-001 FMFAX1AH-MSD
Date Sampled...: 04/21/03 10:25 **Date Received..:** 04/22/03
Prep Date.....: 04/28/03 **Analysis Date..:** 05/01/03
Prep Batch #...: 3118243 **Analysis Time..:** 12:23
Dilution Factor: 1 **% Moisture.....:** 26

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
2,4-D	**30**	**(10 - 150)**			**SW846 8151A**
	33	**(10 - 150)**	**9.8**	**(0-30)**	**SW846 8151A**
2,4-DB	**40 a**	**(50 - 150)**			**SW846 8151A**
	41 a	**(50 - 150)**	**0.84**	**(0-30)**	**SW846 8151A**
2,4,5-TP (Silvex)	**43**	**(10 - 150)**			**SW846 8151A**
	42	**(10 - 150)**	**3.0**	**(0-30)**	**SW846 8151A**
2,4,5-T	**35 a**	**(50 - 150)**			**SW846 8151A**
	35 a	**(50 - 150)**	**1.7**	**(0-30)**	**SW846 8151A**
Dalapon	**5.9 a**	**(10 - 115)**			**SW846 8151A**
	6.9 a	**(10 - 115)**	**16**	**(0-30)**	**SW846 8151A**
Dicamba	**36**	**(10 - 150)**			**SW846 8151A**
	35	**(10 - 150)**	**4.9**	**(0-30)**	**SW846 8151A**
Dichlorprop	**43**	**(10 - 150)**			**SW846 8151A**
	42	**(10 - 150)**	**1.1**	**(0-30)**	**SW846 8151A**
Dinoseb	**6.0 a**	**(10 - 115)**			**SW846 8151A**
	7.8 a	**(10 - 115)**	**25**	**(0-30)**	**SW846 8151A**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2,4-Dichlorophenylacetic acid	42	(10 - 150)
	42	(10 - 150)

NOTE(S):

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

Bold print denotes control parameters

Results and reporting limits have been adjusted for dry weight.

a Spiked analyte recovery is outside stated control limits.

MATRIX SPIKE SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...: F3D230184 **Work Order #...:** FMFAX1AJ-MS **Matrix.....:** SOLID
MS Lot-Sample #: F3D230184-001 FMFAX1AK-MSD
Date Sampled...: 04/21/03 10:25 **Date Received..:** 04/22/03
Prep Date.....: 05/01/03 **Analysis Date..:** 05/05/03
Prep Batch #...: 3121500 **Analysis Time..:** 13:41
Dilution Factor: 1 **% Moisture.....:** 26

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
2,4-D	**65**	**(10 - 150)**			**SW846 8151A**
	48	**(10 - 150)**	**30**	**(0-30)**	**SW846 8151A**
2,4-DB	**66**	**(50 - 150)**			**SW846 8151A**
	47 a,p	**(50 - 150)**	**34**	**(0-30)**	**SW846 8151A**
2,4,5-TP (Silvex)	**75**	**(10 - 150)**			**SW846 8151A**
	71	**(10 - 150)**	**5.9**	**(0-30)**	**SW846 8151A**
2,4,5-T	**70**	**(50 - 150)**			**SW846 8151A**
	58	**(50 - 150)**	**20**	**(0-30)**	**SW846 8151A**
Dalapon	**28**	**(10 - 115)**			**SW846 8151A**
	21	**(10 - 115)**	**29**	**(0-30)**	**SW846 8151A**
Dicamba	**72**	**(10 - 150)**			**SW846 8151A**
	59	**(10 - 150)**	**20**	**(0-30)**	**SW846 8151A**
Dichlorprop	**75**	**(10 - 150)**			**SW846 8151A**
	66	**(10 - 150)**	**12**	**(0-30)**	**SW846 8151A**
Dinoseb	**12**	**(10 - 115)**			**SW846 8151A**
	12	**(10 - 115)**	**1.7**	**(0-30)**	**SW846 8151A**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2,4-Dichlorophenylacetic acid	75	(10 - 150)
	65	(10 - 150)

NOTE(S):

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

Bold print denotes control parameters

Results and reporting limits have been adjusted for dry weight.

a Spiked analyte recovery is outside stated control limits.

p Relative percent difference (RPD) is outside stated control limits.

SAMPLE DUPLICATE EVALUATION REPORT

General Chemistry

Client Lot #...: F3D230184 **Work Order #...:** FMFA9-SMP FMFA9-DUP **Matrix.....:** SOLID

Date Sampled...: 04/21/03 09:55 **Date Received..:** 04/22/03

% Moisture.....: 15

PARAM	RESULT	DUPLICATE RESULT	UNITS	RPD	RPD LIMIT	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Moisture						SD Lot-Sample #:	F3D230184-004	
	15.2	15.4	%	1.7	(0-30)	MCAWW 160.3 MOD	04/24-04/25/03	3114314

Dilution Factor: 1 Analysis Time..: 00:04

IHW/F1630/IN

Mailed 5/15/03

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

IHW/F1630/IN

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Richard Hubble, President
Street, Apt. No.; or PO Box No.: Lajitas Resort
City, State, ZIP+4: HC 70 Box 400 Lajitas, Tx 79852

PS Form 3800, January 2001 — See Reverse for Instructions

7001 0320 0003 9510 0773

7001 0320 0003 9510 0773

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Richard Hubble, President
Lajitas Resort
HC 70 Box 400
Lajitas, Tx 79852

IHW/F1630/IN

2. Article Number (Transfer from service label) 7001 0320 0003 9510 0773

PS Form 3811, August 2001 — Domestic Return Receipt — 102595-02-M-1035

N DELIVERY

A. Signature
X [signature] ☒ Agent ☐ Addressee

B. Received by (Printed Name) Amanda Willard — C. Date of Delivery 5-19

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☒ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes