

OCFL Leachate

June 11, 2020

Environmental Manager  
Ottawa County Landfill  
15550 68th Avenue  
Coopersville, MI 49404

RE: Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

Dear Environmental Manager:

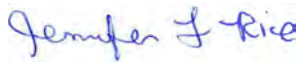
Enclosed are the analytical results for sample(s) received by the laboratory on May 27, 2020. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Grand Rapids
- Pace Analytical Services - Indianapolis
- Pace Analytical Services - New Orleans

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Jennifer Rice  
jennifer.rice@pacelabs.com  
(616)975-4500  
Project Manager

Enclosures

cc: Trihydro Lab Data, TriHydro



## REPORT OF LABORATORY ANALYSIS

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## CERTIFICATIONS

Project: Ottawa County Farms Landfill

Pace Project No.: 50258232

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### **Pace Analytical Services New Orleans**

California Env. Lab Accreditation Program Branch:  
11277CA

Florida Department of Health (NELAC): E87595

Illinois Environmental Protection Agency: 0025721

Kansas Department of Health and Environment (NELAC):  
E-10266

Louisiana Dept. of Environmental Quality (NELAC/LELAP):  
02006

Texas Commission on Env. Quality (NELAC):  
T104704405-09-TX

U.S. Dept. of Agriculture Foreign Soil Import: P330-10-  
00119

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### **Pace Analytical Services Indianapolis**

7726 Moller Road, Indianapolis, IN 46268

Illinois Accreditation #: 200074

Indiana Drinking Water Laboratory #: C-49-06

Kansas/TNI Certification #: E-10177

Kentucky UST Agency Interest #: 80226

Kentucky WW Laboratory ID #: 98019

Michigan Drinking Water Laboratory #9050

Ohio VAP Certified Laboratory #: CL0065

Oklahoma Laboratory #: 9204

Texas Certification #: T104704355

West Virginia Certification #: 330

Wisconsin Laboratory #: 999788130

USDA Soil Permit #: P330-19-00257

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### **Pace Analytical Services Grand Rapids**

5560 Corporate Exchange Ct SE, Grand Rapids, MI 49512

Minnesota/TNI Laboratory #026-999-161

Michigan Drinking Water Laboratory #0034

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## REPORT OF LABORATORY ANALYSIS

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## SAMPLE SUMMARY

Project: Ottawa County Farms Landfill

Pace Project No.: 50258232

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| Lab ID      | Sample ID  | Matrix | Date Collected | Date Received  |
|-------------|------------|--------|----------------|----------------|
| 50258232001 | Leachate   | Water  | 05/27/20 16:00 | 05/27/20 16:55 |
| 50258232002 | Trip Blank | Water  | 05/27/20 00:00 | 05/27/20 16:55 |

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### SAMPLE ANALYTE COUNT

Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

| Lab ID      | Sample ID | Method          | Analysts | Analytes Reported | Laboratory |
|-------------|-----------|-----------------|----------|-------------------|------------|
| 50258232001 | Leachate  |                 | JLR1     | 3                 | PASI-GR    |
|             |           | EPA 6010        | JPK      | 5                 | PASI-I     |
|             |           | EPA 5030B/8260  | JPV      | 50                | PASI-I     |
|             |           | EPA 1010        | WDB      | 1                 | PASI-I     |
|             |           | SM 2320B        | SCM      | 3                 | PASI-I     |
|             |           | SM 2540C        | SKK      | 1                 | PASI-I     |
|             |           | SM 2540D        | SKK      | 1                 | PASI-I     |
|             |           | SW-846 7.3.4.2  | LJL      | 1                 | PASI-N     |
|             |           | ASTM D516-90,02 | TPD      | 1                 | PASI-I     |
|             |           | SM 4500-CI-E    | GWA      | 1                 | PASI-I     |
|             |           | SM 4500-NH3 G   | DAC1     | 1                 | PASI-I     |
|             |           | SM 5310C        | GWA      | 1                 | PASI-I     |
|             |           | SW-846 7.3.3.2  | MHM      | 1                 | PASI-N     |

PASI-GR = Pace Analytical Services - Grand Rapids  
PASI-I = Pace Analytical Services - Indianapolis  
PASI-N = Pace Analytical Services - New Orleans

### REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

| Sample: Leachate  |         | Lab ID: 50258232001 | Collected: 05/27/20 16:00 | Received: 05/27/20 16:55 | Matrix: Water  |                |            |      |
|---|---------|---------------------|---------------------------|--------------------------|----------------|----------------|------------|------|
| Parameters  | Results | Units               | Report Limit              | DF                       | Prepared       | Analyzed       | CAS No.    | Qual |
| <b>Field Data</b>   |         |                     |                           |                          |                |                |            |      |
| Analytical Method: Pace Analytical Services - Grand Rapids  |         |                     |                           |                          |                |                |            |      |
| Field pH  | 7.58    | Std. Units          |                           | 1                        |                | 06/03/20 09:00 |            |      |
| Field Temperature   | 23.2    | deg C               |                           | 1                        |                | 06/03/20 09:00 |            |      |
| Field Specific Conductance  | 11200   | umhos/cm            |                           | 1                        |                | 06/03/20 09:00 |            |      |
| <b>6010 MET ICP</b>   |         |                     |                           |                          |                |                |            |      |
| Analytical Method: EPA 6010 Preparation Method: EPA 3010<br>Pace Analytical Services - Indianapolis |         |                     |                           |                          |                |                |            |      |
| Calcium   | 90700   | ug/L                | 1000                      | 1                        | 06/03/20 13:30 | 06/11/20 01:22 | 7440-70-2  |      |
| Iron  | 7600    | ug/L                | 50.0                      | 1                        | 06/03/20 13:30 | 06/11/20 01:22 | 7439-89-6  |      |
| Magnesium   | 111000  | ug/L                | 1000                      | 1                        | 06/03/20 13:30 | 06/11/20 01:22 | 7439-95-4  |      |
| Potassium   | 450000  | ug/L                | 10000                     | 20                       | 06/03/20 13:30 | 06/11/20 01:45 | 7440-09-7  |      |
| Sodium  | 2330000 | ug/L                | 20000                     | 20                       | 06/03/20 13:30 | 06/11/20 01:45 | 7440-23-5  |      |
| <b>8260 MSV Low Level</b>   |         |                     |                           |                          |                |                |            |      |
| Analytical Method: EPA 5030B/8260<br>Pace Analytical Services - Indianapolis                        |         |                     |                           |                          |                |                |            |      |
| Acetone   | 955     | ug/L                | 200                       | 10                       |                | 06/02/20 20:09 | 67-64-1    |      |
| Acrylonitrile   | <50.0   | ug/L                | 50.0                      | 10                       |                | 06/02/20 20:09 | 107-13-1   |      |
| Benzene   | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 71-43-2    |      |
| Bromochloromethane  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 74-97-5    |      |
| Bromodichloromethane  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 75-27-4    |      |
| Bromoform   | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 75-25-2    |      |
| Bromomethane  | <50.0   | ug/L                | 50.0                      | 10                       |                | 06/02/20 20:09 | 74-83-9    |      |
| 2-Butanone (MEK)  | 1040    | ug/L                | 50.0                      | 10                       |                | 06/02/20 20:09 | 78-93-3    |      |
| Carbon disulfide  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 75-15-0    |      |
| Carbon tetrachloride  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 56-23-5    |      |
| Chlorobenzene   | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 108-90-7   |      |
| Chloroethane  | <50.0   | ug/L                | 50.0                      | 10                       |                | 06/02/20 20:09 | 75-00-3    |      |
| Chloroform  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 67-66-3    |      |
| Chloromethane   | <50.0   | ug/L                | 50.0                      | 10                       |                | 06/02/20 20:09 | 74-87-3    |      |
| 1,2-Dibromo-3-chloropropane   | <50.0   | ug/L                | 50.0                      | 10                       |                | 06/02/20 20:09 | 96-12-8    |      |
| Dibromochloromethane  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 124-48-1   |      |
| 1,2-Dibromoethane (EDB)   | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 106-93-4   |      |
| Dibromomethane  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 74-95-3    |      |
| 1,2-Dichlorobenzene   | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 95-50-1    |      |
| 1,4-Dichlorobenzene   | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 106-46-7   |      |
| trans-1,4-Dichloro-2-butene   | <50.0   | ug/L                | 50.0                      | 10                       |                | 06/02/20 20:09 | 110-57-6   |      |
| 1,1-Dichloroethane  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 75-34-3    |      |
| 1,2-Dichloroethane  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 107-06-2   |      |
| 1,1-Dichloroethene  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 75-35-4    |      |
| cis-1,2-Dichloroethene  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 156-59-2   |      |
| trans-1,2-Dichloroethene  | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 156-60-5   |      |
| 1,2-Dichloropropane   | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 78-87-5    |      |
| cis-1,3-Dichloropropene   | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 10061-01-5 |      |
| trans-1,3-Dichloropropene   | <10.0   | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 10061-02-6 |      |
| Ethylbenzene  | 12.1    | ug/L                | 10.0                      | 10                       |                | 06/02/20 20:09 | 100-41-4   |      |
| 2-Hexanone  | <50.0   | ug/L                | 50.0                      | 10                       |                | 06/02/20 20:09 | 591-78-6   |      |

### REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS

Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

| Sample: Leachate                    | Lab ID: 50258232001 | Collected: 05/27/20 16:00  | Received: 05/27/20 16:55 | Matrix: Water |                |                |           |      |
|-------------------------------------|---------------------|--|--------------------------|---------------|----------------|----------------|-----------|------|
| Parameters                          | Results             | Units  | Report Limit             | DF            | Prepared       | Analyzed       | CAS No.   | Qual |
| <b>8260 MSV Low Level</b>           |                     | Analytical Method: EPA 5030B/8260<br>Pace Analytical Services - Indianapolis                                   |                          |               |                |                |           |      |
| Iodomethane                         | <10.0               | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 74-88-4   |      |
| Methylene Chloride                  | <50.0               | ug/L   | 50.0                     | 10            |                | 06/02/20 20:09 | 75-09-2   |      |
| 4-Methyl-2-pentanone (MIBK)         | <50.0               | ug/L   | 50.0                     | 10            |                | 06/02/20 20:09 | 108-10-1  |      |
| Styrene                             | <10.0               | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 100-42-5  |      |
| 1,1,1,2-Tetrachloroethane           | <10.0               | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 630-20-6  |      |
| 1,1,2,2-Tetrachloroethane           | <10.0               | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 79-34-5   |      |
| Tetrachloroethene                   | <10.0               | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 127-18-4  |      |
| Toluene                             | 61.7                | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 108-88-3  |      |
| 1,1,1-Trichloroethane               | <10.0               | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 71-55-6   |      |
| 1,1,2-Trichloroethane               | <10.0               | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 79-00-5   |      |
| Trichloroethene                     | <10.0               | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 79-01-6   |      |
| Trichlorofluoromethane              | <10.0               | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 75-69-4   |      |
| 1,2,3-Trichloropropane              | <10.0               | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 96-18-4   |      |
| Vinyl acetate                       | <50.0               | ug/L   | 50.0                     | 10            |                | 06/02/20 20:09 | 108-05-4  |      |
| Vinyl chloride                      | <10.0               | ug/L   | 10.0                     | 10            |                | 06/02/20 20:09 | 75-01-4   |      |
| Xylene (Total)                      | 38.4                | ug/L   | 20.0                     | 10            |                | 06/02/20 20:09 | 1330-20-7 |      |
| <b>Surrogates</b>                   |                     |  |                          |               |                |                |           |      |
| 4-Bromofluorobenzene (S)            | 92                  | %  | 85-116                   | 10            |                | 06/02/20 20:09 | 460-00-4  | F1   |
| Dibromofluoromethane (S)            | 106                 | %  | 75-120                   | 10            |                | 06/02/20 20:09 | 1868-53-7 |      |
| Toluene-d8 (S)                      | 105                 | %  | 83-111                   | 10            |                | 06/02/20 20:09 | 2037-26-5 |      |
| <b>1010 Flashpoint,Closed Cup</b>   |                     | Analytical Method: EPA 1010<br>Pace Analytical Services - Indianapolis   |                          |               |                |                |           |      |
| Flashpoint                          | >200                | deg F  |                          | 1             |                | 06/03/20 21:56 |           |      |
| <b>2320B Alkalinity</b>             |                     | Analytical Method: SM 2320B<br>Pace Analytical Services - Indianapolis   |                          |               |                |                |           |      |
| Alkalinity, Total as CaCO3          | 7940                | mg/L   | 10.0                     | 1             |                | 06/04/20 12:33 |           |      |
| Alkalinity,Bicarbonate (CaCO3)      | 7940                | mg/L   | 10.0                     | 1             |                | 06/04/20 12:33 |           |      |
| Alkalinity,Carbonate (CaCO3)        | <10.0               | mg/L   | 10.0                     | 1             |                | 06/04/20 12:33 |           |      |
| <b>2540C Total Dissolved Solids</b> |                     | Analytical Method: SM 2540C<br>Pace Analytical Services - Indianapolis   |                          |               |                |                |           |      |
| Total Dissolved Solids              | 8400000             | ug/L   | 200000                   | 1             |                | 06/02/20 11:42 |           |      |
| <b>2540D Total Suspended Solids</b> |                     | Analytical Method: SM 2540D<br>Pace Analytical Services - Indianapolis   |                          |               |                |                |           |      |
| Total Suspended Solids              | 39000               | ug/L   | 25000                    | 1             |                | 05/29/20 17:04 |           |      |
| <b>734S Reactive Sulfide</b>        |                     | Analytical Method: SW-846 7.3.4.2 Preparation Method: SW-846 7.3.4.2<br>Pace Analytical Services - New Orleans |                          |               |                |                |           |      |
| Sulfide, Reactive                   | <50.0               | mg/kg  | 50.0                     | 1             | 06/02/20 09:47 | 06/02/20 13:39 |           |      |

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### ANALYTICAL RESULTS

Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

| Sample: Leachate   | Lab ID: 50258232001 | Collected: 05/27/20 16:00 | Received: 05/27/20 16:55 | Matrix: Water |                |                |            |       |
|--|---------------------|---------------------------|--------------------------|---------------|----------------|----------------|------------|-------|
| Parameters   | Results             | Units                     | Report Limit             | DF            | Prepared       | Analyzed       | CAS No.    | Qual  |
| <b>ASTM D516-9002 Sulfate Water</b>  |                     |                           |                          |               |                |                |            |       |
| Analytical Method: ASTM D516-90,02<br>Pace Analytical Services - Indianapolis                                  |                     |                           |                          |               |                |                |            |       |
| Sulfate  | <b>&lt;500000</b>   | ug/L                      | 500000                   | 50            |                | 06/03/20 15:22 | 14808-79-8 | D3    |
| <b>4500 Chloride</b>   |                     |                           |                          |               |                |                |            |       |
| Analytical Method: SM 4500-Cl-E<br>Pace Analytical Services - Indianapolis                                     |                     |                           |                          |               |                |                |            |       |
| Chloride   | <b>2090000</b>      | ug/L                      | 50000                    | 50            |                | 06/08/20 10:06 | 16887-00-6 |       |
| <b>4500 Ammonia Water, Distilled</b>   |                     |                           |                          |               |                |                |            |       |
| Analytical Method: SM 4500-NH3 G Preparation Method: SM 4500-NH3 B<br>Pace Analytical Services - Indianapolis  |                     |                           |                          |               |                |                |            |       |
| Nitrogen, Ammonia  | <b>1260000</b>      | ug/L                      | 30000                    | 5             | 06/03/20 13:03 | 06/03/20 14:21 | 7664-41-7  | P4    |
| <b>5310C TOC</b>   |                     |                           |                          |               |                |                |            |       |
| Analytical Method: SM 5310C<br>Pace Analytical Services - Indianapolis   |                     |                           |                          |               |                |                |            |       |
| Total Organic Carbon   | <b>769000</b>       | ug/L                      | 50000                    | 100           |                | 06/10/20 21:22 | 7440-44-0  | C4,P4 |
| <b>733C S Reactive Cyanide</b>   |                     |                           |                          |               |                |                |            |       |
| Analytical Method: SW-846 7.3.3.2 Preparation Method: SW-846 7.3.3.2<br>Pace Analytical Services - New Orleans |                     |                           |                          |               |                |                |            |       |
| Cyanide, Reactive  | <b>&lt;25.0</b>     | mg/kg                     | 25.0                     | 1             | 06/02/20 09:41 | 06/02/20 14:57 |            |       |

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

QC Batch: 564665      Analysis Method: EPA 6010  
QC Batch Method: EPA 3010      Analysis Description: 6010 MET  
Laboratory: Pace Analytical Services - Indianapolis

Associated Lab Samples: 50258232001

METHOD BLANK: 2605031      Matrix: Water  
Associated Lab Samples: 50258232001

| Parameter | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|-----------|-------|--------------|-----------------|----------------|------------|
| Calcium   | ug/L  | <1000        | 1000            | 06/10/20 04:48 |            |
| Iron      | ug/L  | <50.0        | 50.0            | 06/10/20 04:48 |            |
| Magnesium | ug/L  | <1000        | 1000            | 06/10/20 04:48 |            |
| Potassium | ug/L  | <500         | 500             | 06/10/20 04:48 |            |
| Sodium    | ug/L  | <1000        | 1000            | 06/10/20 04:48 |            |

LABORATORY CONTROL SAMPLE: 2605032

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|-----------|-------|-------------|------------|-----------|--------------|------------|
| Calcium   | ug/L  | 10000       | 9660       | 97        | 80-120       |            |
| Iron      | ug/L  | 10000       | 9130       | 91        | 80-120       |            |
| Magnesium | ug/L  | 10000       | 9200       | 92        | 80-120       |            |
| Potassium | ug/L  | 10000       | 9170       | 92        | 80-120       |            |
| Sodium    | ug/L  | 10000       | 9130       | 91        | 80-120       |            |

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2605033      2605034

| Parameter | Units | MS                 |             | MSD         |        | MS % Rec | MSD % Rec | % Rec Limits | RPD    | Max RPD | Qual  |
|-----------|-------|--------------------|-------------|-------------|--------|----------|-----------|--------------|--------|---------|-------|
|           |       | 50258201003 Result | Spike Conc. | Spike Conc. | Result |          |           |              |        |         |       |
| Calcium   | ug/L  | 95400              | 10000       | 10000       | 104000 | 111000   | 83        | 153          | 75-125 | 7       | 20 P6 |
| Iron      | ug/L  | 912                | 10000       | 10000       | 9810   | 10100    | 89        | 91           | 75-125 | 3       | 20    |
| Magnesium | ug/L  | 46900              | 10000       | 10000       | 55600  | 59100    | 87        | 122          | 75-125 | 6       | 20    |
| Potassium | ug/L  | 3400               | 10000       | 10000       | 12700  | 13100    | 93        | 97           | 75-125 | 3       | 20    |
| Sodium    | ug/L  | 20300              | 10000       | 10000       | 29400  | 30700    | 91        | 104          | 75-125 | 5       | 20    |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

QC Batch: 564951 Analysis Method: EPA 5030B/8260  
QC Batch Method: EPA 5030B/8260 Analysis Description: 8260 MSV Low Level  
Laboratory: Pace Analytical Services - Indianapolis  
Associated Lab Samples: 50258232001

METHOD BLANK: 2605940 Matrix: Water  
Associated Lab Samples: 50258232001

| Parameter                   | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|-----------------------------|-------|--------------|-----------------|----------------|------------|
| 1,1,1,2-Tetrachloroethane   | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 1,1,1-Trichloroethane       | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 1,1,2,2-Tetrachloroethane   | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 1,1,2-Trichloroethane       | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 1,1-Dichloroethane          | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 1,1-Dichloroethene          | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 1,2,3-Trichloropropane      | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 1,2-Dibromo-3-chloropropane | ug/L  | <5.0         | 5.0             | 06/02/20 13:39 |            |
| 1,2-Dibromoethane (EDB)     | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 1,2-Dichlorobenzene         | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 1,2-Dichloroethane          | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 1,2-Dichloropropane         | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 1,4-Dichlorobenzene         | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| 2-Butanone (MEK)            | ug/L  | <5.0         | 5.0             | 06/02/20 13:39 |            |
| 2-Hexanone                  | ug/L  | <5.0         | 5.0             | 06/02/20 13:39 |            |
| 4-Methyl-2-pentanone (MIBK) | ug/L  | <5.0         | 5.0             | 06/02/20 13:39 |            |
| Acetone                     | ug/L  | <20.0        | 20.0            | 06/02/20 13:39 |            |
| Acrylonitrile               | ug/L  | <5.0         | 5.0             | 06/02/20 13:39 |            |
| Benzene                     | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Bromochloromethane          | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Bromodichloromethane        | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Bromoform                   | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Bromomethane                | ug/L  | <5.0         | 5.0             | 06/02/20 13:39 |            |
| Carbon disulfide            | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Carbon tetrachloride        | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Chlorobenzene               | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Chloroethane                | ug/L  | <5.0         | 5.0             | 06/02/20 13:39 |            |
| Chloroform                  | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Chloromethane               | ug/L  | <5.0         | 5.0             | 06/02/20 13:39 |            |
| cis-1,2-Dichloroethene      | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| cis-1,3-Dichloropropene     | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Dibromochloromethane        | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Dibromomethane              | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Ethylbenzene                | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Iodomethane                 | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Methylene Chloride          | ug/L  | <5.0         | 5.0             | 06/02/20 13:39 |            |
| Styrene                     | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Tetrachloroethene           | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Toluene                     | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| trans-1,2-Dichloroethene    | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |

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### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill

Pace Project No.: 50258232

METHOD BLANK: 2605940

Matrix: Water

Associated Lab Samples: 50258232001

| Parameter                   | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|-----------------------------|-------|--------------|-----------------|----------------|------------|
| trans-1,3-Dichloropropene   | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| trans-1,4-Dichloro-2-butene | ug/L  | <5.0         | 5.0             | 06/02/20 13:39 |            |
| Trichloroethene             | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Trichlorofluoromethane      | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Vinyl acetate               | ug/L  | <5.0         | 5.0             | 06/02/20 13:39 |            |
| Vinyl chloride              | ug/L  | <1.0         | 1.0             | 06/02/20 13:39 |            |
| Xylene (Total)              | ug/L  | <2.0         | 2.0             | 06/02/20 13:39 |            |
| 4-Bromofluorobenzene (S)    | %     | 93           | 85-116          | 06/02/20 13:39 |            |
| Dibromofluoromethane (S)    | %     | 106          | 75-120          | 06/02/20 13:39 |            |
| Toluene-d8 (S)              | %     | 102          | 83-111          | 06/02/20 13:39 |            |

LABORATORY CONTROL SAMPLE: 2605941

| Parameter                   | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|-----------------------------|-------|-------------|------------|-----------|--------------|------------|
| 1,1,1,2-Tetrachloroethane   | ug/L  | 50          | 50.6       | 101       | 78-120       |            |
| 1,1,1-Trichloroethane       | ug/L  | 50          | 59.7       | 119       | 78-130       |            |
| 1,1,2,2-Tetrachloroethane   | ug/L  | 50          | 55.6       | 111       | 64-126       |            |
| 1,1,2-Trichloroethane       | ug/L  | 50          | 48.7       | 97        | 73-125       |            |
| 1,1-Dichloroethane          | ug/L  | 50          | 58.6       | 117       | 77-123       |            |
| 1,1-Dichloroethene          | ug/L  | 50          | 57.8       | 116       | 79-128       |            |
| 1,2,3-Trichloropropane      | ug/L  | 50          | 55.5       | 111       | 71-131       |            |
| 1,2-Dibromo-3-chloropropane | ug/L  | 50          | 39.5       | 79        | 71-133       |            |
| 1,2-Dibromoethane (EDB)     | ug/L  | 50          | 48.0       | 96        | 76-122       |            |
| 1,2-Dichlorobenzene         | ug/L  | 50          | 45.7       | 91        | 79-113       |            |
| 1,2-Dichloroethane          | ug/L  | 50          | 51.6       | 103       | 66-127       |            |
| 1,2-Dichloropropane         | ug/L  | 50          | 51.0       | 102       | 75-127       |            |
| 1,4-Dichlorobenzene         | ug/L  | 50          | 51.9       | 104       | 77-117       |            |
| 2-Butanone (MEK)            | ug/L  | 250         | 219        | 88        | 61-138       |            |
| 2-Hexanone                  | ug/L  | 250         | 244        | 98        | 58-138       |            |
| 4-Methyl-2-pentanone (MIBK) | ug/L  | 250         | 257        | 103       | 60-131       |            |
| Acetone                     | ug/L  | 250         | 216        | 86        | 57-126       |            |
| Acrylonitrile               | ug/L  | 200         | 183        | 91        | 65-127       |            |
| Benzene                     | ug/L  | 50          | 52.4       | 105       | 75-118       |            |
| Bromochloromethane          | ug/L  | 50          | 45.4       | 91        | 66-126       |            |
| Bromodichloromethane        | ug/L  | 50          | 50.1       | 100       | 75-120       |            |
| Bromoform                   | ug/L  | 50          | 47.9       | 96        | 61-119       |            |
| Bromomethane                | ug/L  | 50          | 86.1       | 172       | 12-184       |            |
| Carbon disulfide            | ug/L  | 50          | 59.3       | 119       | 71-123       |            |
| Carbon tetrachloride        | ug/L  | 50          | 59.2       | 118       | 73-125       |            |
| Chlorobenzene               | ug/L  | 50          | 52.5       | 105       | 80-115       |            |
| Chloroethane                | ug/L  | 50          | 55.9       | 112       | 46-133       |            |
| Chloroform                  | ug/L  | 50          | 52.4       | 105       | 75-117       |            |
| Chloromethane               | ug/L  | 50          | 51.4       | 103       | 33-124       |            |
| cis-1,2-Dichloroethene      | ug/L  | 50          | 52.7       | 105       | 76-120       |            |

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

LABORATORY CONTROL SAMPLE: 2605941

| Parameter                   | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|-----------------------------|-------|-------------|------------|-----------|--------------|------------|
| cis-1,3-Dichloropropene     | ug/L  | 50          | 53.4       | 107       | 73-130       |            |
| Dibromochloromethane        | ug/L  | 50          | 49.1       | 98        | 69-124       |            |
| Dibromomethane              | ug/L  | 50          | 50.8       | 102       | 76-124       |            |
| Ethylbenzene                | ug/L  | 50          | 53.6       | 107       | 78-120       |            |
| Iodomethane                 | ug/L  | 100         | 88.7       | 89        | 10-184       |            |
| Methylene Chloride          | ug/L  | 50          | 52.9       | 106       | 68-126       |            |
| Styrene                     | ug/L  | 50          | 49.2       | 98        | 80-121       |            |
| Tetrachloroethene           | ug/L  | 50          | 55.0       | 110       | 70-123       |            |
| Toluene                     | ug/L  | 50          | 53.3       | 107       | 72-114       |            |
| trans-1,2-Dichloroethene    | ug/L  | 50          | 55.9       | 112       | 79-126       |            |
| trans-1,3-Dichloropropene   | ug/L  | 50          | 49.9       | 100       | 68-122       |            |
| trans-1,4-Dichloro-2-butene | ug/L  | 200         | 223        | 111       | 34-130       |            |
| Trichloroethene             | ug/L  | 50          | 53.3       | 107       | 78-120       |            |
| Trichlorofluoromethane      | ug/L  | 50          | 64.7       | 129       | 57-156       |            |
| Vinyl acetate               | ug/L  | 200         | 192        | 96        | 50-116       |            |
| Vinyl chloride              | ug/L  | 50          | 53.0       | 106       | 55-122       |            |
| Xylene (Total)              | ug/L  | 150         | 159        | 106       | 81-118       |            |
| 4-Bromofluorobenzene (S)    | %     |             |            | 98        | 85-116       |            |
| Dibromofluoromethane (S)    | %     |             |            | 106       | 75-120       |            |
| Toluene-d8 (S)              | %     |             |            | 104       | 83-111       |            |

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill

Pace Project No.: 50258232

QC Batch: 565404

Analysis Method: SM 2320B

QC Batch Method: SM 2320B

Analysis Description: 2320B Alkalinity

Laboratory: Pace Analytical Services - Indianapolis

Associated Lab Samples: 50258232001

METHOD BLANK: 2607909

Matrix: Water

Associated Lab Samples: 50258232001

| Parameter                                   | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|---|-------|--------------|-----------------|----------------|------------|
| Alkalinity, Total as CaCO <sub>3</sub>      | mg/L  | <10.0        | 10.0            | 06/04/20 12:13 |            |
| Alkalinity,Bicarbonate (CaCO <sub>3</sub> ) | mg/L  | <10.0        | 10.0            | 06/04/20 12:13 |            |
| Alkalinity,Carbonate (CaCO <sub>3</sub> )   | mg/L  | <10.0        | 10.0            | 06/04/20 12:13 |            |

LABORATORY CONTROL SAMPLE: 2607910

| Parameter                              | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|--|-------|-------------|------------|-----------|--------------|------------|
| Alkalinity, Total as CaCO <sub>3</sub> | mg/L  | 50          | 50.0       | 100       | 90-110       |            |

SAMPLE DUPLICATE: 2607911

| Parameter                                   | Units | 50258752001 Result | Dup Result | RPD | Max RPD | Qualifiers |
|---|-------|--------------------|------------|-----|---------|------------|
| Alkalinity, Total as CaCO <sub>3</sub>      | mg/L  | 2420               | 2400       | 1   | 20      |            |
| Alkalinity,Bicarbonate (CaCO <sub>3</sub> ) | mg/L  | 2420               | 2400       | 1   | 20      |            |
| Alkalinity,Carbonate (CaCO <sub>3</sub> )   | mg/L  | ND                 | <10.0      |     | 20      |            |

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill

Pace Project No.: 50258232

QC Batch: 564899

Analysis Method: SM 2540C

QC Batch Method: SM 2540C

Analysis Description: 2540C Total Dissolved Solids

Laboratory: Pace Analytical Services - Indianapolis

Associated Lab Samples: 50258232001

METHOD BLANK: 2605705

Matrix: Water

Associated Lab Samples: 50258232001

| Parameter              | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|------------------------|-------|--------------|-----------------|----------------|------------|
| Total Dissolved Solids | ug/L  | <10000       | 10000           | 06/02/20 11:41 |            |

LABORATORY CONTROL SAMPLE: 2605706

| Parameter              | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|------------------------|-------|-------------|------------|-----------|--------------|------------|
| Total Dissolved Solids | ug/L  | 300000      | 283000     | 94        | 80-120       |            |

SAMPLE DUPLICATE: 2605707

| Parameter              | Units | 50258170002 Result | Dup Result | RPD | Max RPD | Qualifiers |
|------------------------|-------|--------------------|------------|-----|---------|------------|
| Total Dissolved Solids | ug/L  | 566 mg/L           | 568000     | 0   | 10      |            |

SAMPLE DUPLICATE: 2605708

| Parameter              | Units | 50258335005 Result | Dup Result | RPD | Max RPD | Qualifiers |
|------------------------|-------|--------------------|------------|-----|---------|------------|
| Total Dissolved Solids | ug/L  | 515 mg/L           | 507000     | 2   | 10      |            |

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill

Pace Project No.: 50258232

QC Batch: 564450

Analysis Method: SM 2540D

QC Batch Method: SM 2540D

Analysis Description: 2540D Total Suspended Solids

Laboratory: Pace Analytical Services - Indianapolis

Associated Lab Samples: 50258232001

METHOD BLANK: 2604057

Matrix: Water

Associated Lab Samples: 50258232001

| Parameter              | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|------------------------|-------|--------------|-----------------|----------------|------------|
| Total Suspended Solids | ug/L  | <2500        | 2500            | 05/29/20 17:03 |            |

LABORATORY CONTROL SAMPLE: 2604058

| Parameter              | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|------------------------|-------|-------------|------------|-----------|--------------|------------|
| Total Suspended Solids | ug/L  | 100000      | 90000      | 90        | 80-120       |            |

SAMPLE DUPLICATE: 2604060

| Parameter              | Units | 50258277001 Result | Dup Result | RPD | Max RPD | Qualifiers |
|------------------------|-------|--------------------|------------|-----|---------|------------|
| Total Suspended Solids | ug/L  | 33 mg/L            | 29000      | 13  | 10      | R1         |

SAMPLE DUPLICATE: 2604265

| Parameter              | Units | 50258277004 Result | Dup Result | RPD | Max RPD | Qualifiers |
|------------------------|-------|--------------------|------------|-----|---------|------------|
| Total Suspended Solids | ug/L  | 34 mg/L            | 31500      | 6   | 10      |            |

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

|                                 |  |
|---------------------------------|--|
| QC Batch: 187460                | Analysis Method: SW-846 7.3.4.2                    |
| QC Batch Method: SW-846 7.3.4.2 | Analysis Description: 734S Reactive Sulfide        |
|                                 | Laboratory: Pace Analytical Services - New Orleans |

Associated Lab Samples: 50258232001

METHOD BLANK: 863291 Matrix: Solid  
Associated Lab Samples: 50258232001

| Parameter         | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|-------------------|-------|--------------|-----------------|----------------|------------|
| Sulfide, Reactive | mg/kg | <50.0        | 50.0            | 06/02/20 13:39 |            |

LABORATORY CONTROL SAMPLE: 863292

| Parameter         | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|-------------------|-------|-------------|------------|-----------|--------------|------------|
| Sulfide, Reactive | mg/kg | 500         | 441        | 88        | 1-110        |            |

MATRIX SPIKE SAMPLE: 863294

| Parameter         | Units | 50258232001 Result | Spike Conc. | MS Result | MS % Rec | % Rec Limits | Qualifiers |
|-------------------|-------|--------------------|-------------|-----------|----------|--------------|------------|
| Sulfide, Reactive | mg/kg | <50.0              | 500         | 441       | 84       | 1-110        |            |

SAMPLE DUPLICATE: 863293

| Parameter         | Units | 50258232001 Result | Dup Result | RPD | Max RPD | Qualifiers |
|-------------------|-------|--------------------|------------|-----|---------|------------|
| Sulfide, Reactive | mg/kg | <50.0              | <50.0      |     | 20      |            |

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

QC Batch: 565212      Analysis Method: ASTM D516-90,02  
QC Batch Method: ASTM D516-90,02      Analysis Description: ASTM D516-9002 Sulfate Water  
Laboratory: Pace Analytical Services - Indianapolis  
Associated Lab Samples: 50258232001

METHOD BLANK: 2607086      Matrix: Water  
Associated Lab Samples: 50258232001

| Parameter | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|-----------|-------|--------------|-----------------|----------------|------------|
| Sulfate   | ug/L  | <10000       | 10000           | 06/03/20 14:02 |            |

LABORATORY CONTROL SAMPLE: 2607087

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|-----------|-------|-------------|------------|-----------|--------------|------------|
| Sulfate   | ug/L  | 20000       | 21100      | 106       | 90-110       |            |

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2607088      2607089

| Parameter | Units | 50258281002    |                 | 2607089   |            | MS % Rec | MSD % Rec | % Rec Limits | RPD    | Max RPD | Qual |
|-----------|-------|----------------|-----------------|-----------|------------|----------|-----------|--------------|--------|---------|------|
|           |       | MS Spike Conc. | MSD Spike Conc. | MS Result | MSD Result |          |           |              |        |         |      |
| Sulfate   | ug/L  | 211 mg/L       | 500000          | 500000    | 711000     | 685000   | 100       | 95           | 90-110 | 4       | 20   |

MATRIX SPIKE SAMPLE: 2607090

| Parameter | Units | 50258486001 Result | Spike Conc. | MS Result | MS % Rec | % Rec Limits | Qualifiers |
|-----------|-------|--------------------|-------------|-----------|----------|--------------|------------|
| Sulfate   | ug/L  | 121 mg/L           | 200000      | 333000    | 106      | 90-110       |            |

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

QC Batch: 565858      Analysis Method: SM 4500-Cl-E  
QC Batch Method: SM 4500-Cl-E      Analysis Description: 4500 Chloride  
Laboratory: Pace Analytical Services - Indianapolis  
Associated Lab Samples: 50258232001

METHOD BLANK: 2610345      Matrix: Water  
Associated Lab Samples: 50258232001

| Parameter | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|-----------|-------|--------------|-----------------|----------------|------------|
| Chloride  | ug/L  | <1000        | 1000            | 06/08/20 09:37 |            |

LABORATORY CONTROL SAMPLE: 2610346

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|-----------|-------|-------------|------------|-----------|--------------|------------|
| Chloride  | ug/L  | 20000       | 20000      | 100       | 90-110       |            |

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2610347      2610348

| Parameter | Units | 50258166001 |            | 2610347        |                 | 2610348   |            | % Rec Limits | RPD | Max RPD | Qual |          |
|-----------|-------|-------------|------------|----------------|-----------------|-----------|------------|--------------|-----|---------|------|----------|
|           |       | MS Result   | MSD Result | MS Spike Conc. | MSD Spike Conc. | MS Result | MSD Result |              |     |         |      | MS % Rec |
| Chloride  | ug/L  | <10.0 mg/L  |            | 20000          | 20000           | 22300     | 22500      | 103          | 104 | 90-110  | 1    | 20       |

MATRIX SPIKE SAMPLE: 2610349

| Parameter | Units | 50258231001 Result | Spike Conc. | MS Result | MS % Rec | % Rec Limits | Qualifiers |
|-----------|-------|--------------------|-------------|-----------|----------|--------------|------------|
| Chloride  | ug/L  | 16600              | 20000       | 38600     | 110      | 90-110       |            |

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill

Pace Project No.: 50258232

QC Batch: 565148

Analysis Method: SM 4500-NH3 G

QC Batch Method: SM 4500-NH3 B

Analysis Description: 4500 Ammonia, Distilled

Laboratory: Pace Analytical Services - Indianapolis

Associated Lab Samples: 50258232001

METHOD BLANK: 2606677

Matrix: Water

Associated Lab Samples: 50258232001

| Parameter         | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|-------------------|-------|--------------|-----------------|----------------|------------|
| Nitrogen, Ammonia | ug/L  | <100         | 100             | 06/03/20 14:19 |            |

LABORATORY CONTROL SAMPLE: 2606678

| Parameter         | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|-------------------|-------|-------------|------------|-----------|--------------|------------|
| Nitrogen, Ammonia | ug/L  | 1670        | 1790       | 108       | 90-110       |            |

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2606679 2606680

| Parameter         | Units | 50258253001    |                 | 2606680   |            | MS % Rec | MSD % Rec | % Rec Limits | RPD    | Max RPD | Qual |  |
|-------------------|-------|----------------|-----------------|-----------|------------|----------|-----------|--------------|--------|---------|------|--|
|                   |       | MS Spike Conc. | MSD Spike Conc. | MS Result | MSD Result |          |           |              |        |         |      |  |
| Nitrogen, Ammonia | ug/L  | 0.16 mg/L      | 1670            | 1670      | 1850       | 1910     | 101       | 105          | 90-110 | 3       | 20   |  |

MATRIX SPIKE SAMPLE: 2606681

| Parameter         | Units | 50258665001 Result | Spike Conc. | MS Result | MS % Rec | % Rec Limits | Qualifiers |
|-------------------|-------|--------------------|-------------|-----------|----------|--------------|------------|
| Nitrogen, Ammonia | ug/L  | 0.14 mg/L          | 1670        | 2050      | 114      | 90-110       | M0         |

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill

Pace Project No.: 50258232

QC Batch: 566201

Analysis Method: SM 5310C

QC Batch Method: SM 5310C

Analysis Description: 5310C Total Organic Carbon

Laboratory: Pace Analytical Services - Indianapolis

Associated Lab Samples: 50258232001

METHOD BLANK: 2611521

Matrix: Water

Associated Lab Samples: 50258232001

| Parameter            | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|----------------------|-------|--------------|-----------------|----------------|------------|
| Total Organic Carbon | ug/L  | <500         | 500             | 06/10/20 11:02 |            |

LABORATORY CONTROL SAMPLE: 2611522

| Parameter            | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|----------------------|-------|-------------|------------|-----------|--------------|------------|
| Total Organic Carbon | ug/L  | 10000       | 9540       | 95        | 90-110       |            |

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2611523 2611524

| Parameter            | Units | 50257990008    |                 | 2611523   |            | 2611524  |           | % Rec Limits | RPD    | Max RPD | Qual |  |
|----------------------|-------|----------------|-----------------|-----------|------------|----------|-----------|--------------|--------|---------|------|--|
|                      |       | MS Spike Conc. | MSD Spike Conc. | MS Result | MSD Result | MS % Rec | MSD % Rec |              |        |         |      |  |
| Total Organic Carbon | ug/L  | 1.6 mg/L       | 10000           | 10000     | 11100      | 11200    | 95        | 96           | 80-120 | 1       | 20   |  |

MATRIX SPIKE SAMPLE: 2611525

| Parameter            | Units | 50258201015 Result | Spike Conc. | MS Result | MS % Rec | % Rec Limits | Qualifiers |
|----------------------|-------|--------------------|-------------|-----------|----------|--------------|------------|
| Total Organic Carbon | ug/L  | ND                 | 10000       | 9990      | 95       | 80-120       |            |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA

Project: Ottawa County Farms Landfill

Pace Project No.: 50258232

QC Batch: 187463

Analysis Method: SW-846 7.3.3.2

QC Batch Method: SW-846 7.3.3.2

Analysis Description: 733C Reactive Cyanide

Laboratory: Pace Analytical Services - New Orleans

Associated Lab Samples: 50258232001

METHOD BLANK: 863297

Matrix: Solid

Associated Lab Samples: 50258232001

| Parameter         | Units | Blank Result | Reporting Limit | Analyzed       | Qualifiers |
|-------------------|-------|--------------|-----------------|----------------|------------|
| Cyanide, Reactive | mg/kg | <25.0        | 25.0            | 06/02/20 14:57 |            |

LABORATORY CONTROL SAMPLE: 863298

| Parameter         | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|-------------------|-------|-------------|------------|-----------|--------------|------------|
| Cyanide, Reactive | mg/kg | 50          | <25.0      | 21        | 1-110        |            |

MATRIX SPIKE SAMPLE: 863300

| Parameter         | Units | 50258232001 Result | Spike Conc. | MS Result | MS % Rec | % Rec Limits | Qualifiers |
|-------------------|-------|--------------------|-------------|-----------|----------|--------------|------------|
| Cyanide, Reactive | mg/kg | <25.0              | 50          | <25.0     | 10       | 1-110        |            |

SAMPLE DUPLICATE: 863299

| Parameter         | Units | 50258232001 Result | Dup Result | RPD | Max RPD | Qualifiers |
|-------------------|-------|--------------------|------------|-----|---------|------------|
| Cyanide, Reactive | mg/kg | <25.0              | <25.0      |     | 20      |            |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

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## QUALIFIERS

Project: Ottawa County Farms Landfill

Pace Project No.: 50258232

---

### DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

### ANALYTE QUALIFIERS

- |    |   |
|----|---|
| C4 | Sample container did not meet EPA or method requirements.   |
| D3 | Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.                            |
| F1 | The sample was analyzed at a dilution due to foaming of the sample in the purge vessel.   |
| M0 | Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.                                   |
| P4 | Sample field preservation does not meet EPA or method recommendations for this analysis.  |
| P6 | Matrix spike recovery was outside laboratory control limits due to a parent sample concentration notably higher than the spike level. |
| R1 | RPD value was outside control limits.   |

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Ottawa County Farms Landfill  
Pace Project No.: 50258232

| Lab ID      | Sample ID | QC Batch Method | QC Batch | Analytical Method | Analytical Batch |
|-------------|-----------|-----------------|----------|-------------------|------------------|
| 50258232001 | Leachate  |                 |          |                   |                  |
| 50258232001 | Leachate  | EPA 3010        | 564665   | EPA 6010          | 566290           |
| 50258232001 | Leachate  | EPA 5030B/8260  | 564951   |                   |                  |
| 50258232001 | Leachate  | EPA 1010        | 565326   |                   |                  |
| 50258232001 | Leachate  | SM 2320B        | 565404   |                   |                  |
| 50258232001 | Leachate  | SM 2540C        | 564899   |                   |                  |
| 50258232001 | Leachate  | SM 2540D        | 564450   |                   |                  |
| 50258232001 | Leachate  | SW-846 7.3.4.2  | 187460   | SW-846 7.3.4.2    | 187494           |
| 50258232001 | Leachate  | ASTM D516-90,02 | 565212   |                   |                  |
| 50258232001 | Leachate  | SM 4500-CI-E    | 565858   |                   |                  |
| 50258232001 | Leachate  | SM 4500-NH3 B   | 565148   | SM 4500-NH3 G     | 565199           |
| 50258232001 | Leachate  | SM 5310C        | 566201   |                   |                  |
| 50258232001 | Leachate  | SW-846 7.3.3.2  | 187463   | SW-846 7.3.3.2    | 187545           |

### REPORT OF LABORATORY ANALYSIS

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## Sample Conditions Upon Receipt Form (SCUR)

|  |  |  |  |   |                |
|--|--|--|--|---|----------------|
| Date/Time: <u>5/27/20</u>  |  | Evaluated by: <u>JLR</u>   |  | <b>WO#: 50258232</b><br>PM: JLR1      Due Date: 06/11/20<br>CLIENT: GR-RSC MI |                |
| Client: <u>Republic - Leachate</u>   |  |  |  |   |                |
| Project Manager: <u>JLR</u>  |  | Profile ID: <u>8057</u>  |  |   |                |
| Rush TAT Requested: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>  |  | Due Date:  |  |   |                |
| Lab Notified of Rush or Short Holds: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>   |  | Non Conformance Form Required: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> |  |   |                |
| Samples Received Via: FedEx <input type="checkbox"/> UPS <input type="checkbox"/> Client <input checked="" type="checkbox"/> Pace Courier <input type="checkbox"/> Other: _____                                    |  |  |  |   | Comments:      |
| Custody Seals Present and Intact:  |  | YES  | NO                                     | <input checked="" type="checkbox"/> NA  |                |
| Received Sample Information Form(s): Drinking Waters Only  |  | YES  | NO                                     | <input checked="" type="checkbox"/> NA  |                |
| USDA Regulated Soils: (AL, AR, CA, FL, GA, ID, LA, MS, NM, NY, NC, OK, OR, SC, TN, TX, WA or Puerto Rico)  |  | YES  | NO                                     | <input checked="" type="checkbox"/> N/A                                       |                |
| Short Holds Present (< 72 Hours):  |  | YES  | <input checked="" type="checkbox"/> NO |   |                |
| Samples Received in Hold:  |  | <input checked="" type="checkbox"/> YES  | NO                                     |   |                |
| Custody Signatures Present:  |  | <input checked="" type="checkbox"/> YES  | NO                                     |   |                |
| Collector Signature Present:   |  | <input checked="" type="checkbox"/> YES  | NO                                     |   |                |
| Packing Material Used:   |  | <input checked="" type="checkbox"/> YES  | NO                                     |   |                |
| Samples Collected Today and On Ice:  |  | <input checked="" type="checkbox"/> YES  | NO                                     | N/A   |                |
| IR Gun #: <input checked="" type="checkbox"/> 280    281   |  | Digital Thermometer #:    282    283   |  |   |                |
| Ice Type: WET Bagged / WET Loose <input checked="" type="checkbox"/> BLUE <input type="checkbox"/> NONE <input type="checkbox"/>   |  | 1. Cooler Temp Upon Receipt: <u>1.1 / 1.5</u> °C   |  |   |                |
| Ice Location: TOP <input type="checkbox"/> BOTTOM <input type="checkbox"/> MIDDLE <input type="checkbox"/> <input checked="" type="checkbox"/> DISPERSED   |  | Temp should be 0-6°C (Initial/Corrected)   |  |   |                |
| Temp Blank Received:   |  | <input checked="" type="checkbox"/> YES  | NO                                     |   |                |
| Containers Intact:   |  | <input checked="" type="checkbox"/> YES  | NO                                     |   |                |
| Correct Containers:  |  | YES  | <input checked="" type="checkbox"/> NO |   | <u>SEE NCF</u> |
| Sufficient Volume:   |  | <input checked="" type="checkbox"/> YES  | NO                                     |   |                |
| Sample pH Acceptable: All containers needing preservation are found to be in compliance with EPA recommendation. Exceptions are VOA, coliform, LLHg, O&G, or any container with a septum cap or preserved with HCl |  | YES  | <input checked="" type="checkbox"/> NO | N/A   | <u>SEE NCF</u> |
| Residual Chlorine Absent: (SVOC/Pest 625, PCB 608, Total/Amenable/Available Cyanide)   |  | YES  | NO                                     | <input checked="" type="checkbox"/> N/A                                       |                |
| VOA Headspace Acceptable (<6mm):   |  | <input checked="" type="checkbox"/> YES  | NO                                     | N/A   |                |
| Trip Blank Received: <input checked="" type="checkbox"/> HCl    MeOH    TSP    OTHER   |  | <input checked="" type="checkbox"/> YES  | NO                                     |   | <u>HOLD</u>    |
| Comments:  |  | 2. Cooler Temp Upon Receipt: _____ °C  |  |   |                |
|  |  | 3. Cooler Temp Upon Receipt: _____ °C  |  |   |                |
|  |  | 4. Cooler Temp Upon Receipt: _____ °C  |  |   |                |

Sample Receiving Non-Conformance Form (NCF)

Pace Analytical

**WO# : 50258232**

PM: JLR1 Due Date: 06/11/20  
CLIENT: GR-RSC MI

**COC Integrity Issues:**  
Check issues below and add details where appropriate

**Sample Integrity Issues:**  
Check issues below and add details where appropriate

|   |  |  |  |
|---|--|--|--|
| Date: 5/27/20   | COC does not match samples received (missing, additional, etc.)  | Custody seal(s) damaged or missing on coolers, samples, or trip blanks | *Insufficient sample volume received                                       |
| Evaluated by: JLN   | COC sample ID does not match sample label                        | Cooler or sample container broken or compromised                       | *Sample contains residual chlorine   |
| Client: Republic Leachate   | *COC collection date/time missing or does not match sample label | *Sample past holding time  | Improper preservation  |
| *Drinking Water Deficiency:<br>Samples may be invalid. Analysis must not proceed without client written permission. | *Analyses/ analytes missing or clarification needed              | *Temperature not within acceptance criteria (typically 0-6°C)          | *Sample contains interferences (multi-phasic, solids, color, odor, etc...) |
|   | *Required signatures are missing                                 | *Sample arrived frozen or partially frozen                             | Vial(s) received with improper headspace (>6mm)                            |
|   | *Residual Chlorine presence/absence not indicated on COC         | *Incorrect or improper containers received                             | Other: See notes below   |

| COC       |      |      |                | Sample Label |           |      |      | Sample Notes |                |                      |
|-----------|------|------|----------------|--------------|-----------|------|------|--------------|----------------|----------------------|
| Sample ID | Date | Time | Container Type | Quantity     | Sample ID | Date | Time |              | Container Type | Quantity             |
|           |      |      |                |              | Leachate  |      |      | BP3N         |                | ph = 7               |
|           |      |      |                |              | ↓         |      |      | BP3S         |                | ph = 7               |
|           |      |      |                |              | ↓         |      |      | BP3U         |                | ph = 7 (?)           |
|           |      |      |                |              |           |      |      |              |                | *Missing Containers  |
|           |      |      |                |              |           |      |      |              |                | for Sulfide, Cyanide |
|           |      |      |                |              |           |      |      |              |                | 4 TDC.               |

General Comments/ Client Instructions:

## Waste Analysis Plan

DRAFT  
UNDERGROUND INJECTION  
CONTROL (UIC) WASTE ANALYSIS  
PLAN

Class I Deepwell

for

Ottawa County Farms Landfill  
Ottawa County Landfill, Inc.

Class I Deepwells  
EPA Permit #s TBD

Coopersville, Michigan

July, 2020

Prepared By:

***Petrotek***

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## 1.0 INTRODUCTION

---

### 1.A Background

The purpose of this Waste Analysis Plan (WAP) is to characterize the non-hazardous landfill leachate waste water to be injected into the Ottawa County Landfill, Inc. injection wells to be located at the Ottawa County Farms Landfill (OCFL) in Ottawa County, Michigan. OCFL will be responsible for implementing this WAP. The injection wells are projected to be constructed in 2020 or 2021. Waste will be injected into the Mt. Simon Formation through Trempealeau Formations.

OCFL intends to operate the wells consistent with Title 40 of the Code of Federal Regulations (40 CFR), Section 146.13 that requires operators of Class I underground injection wells to monitor and analyze the fluids injected into the well "to yield representative data of their characteristics." This waste analysis plan also fulfills the specifications at 40 CFR 146.68 by presenting parameters for which the waste will be analyzed, methods that will be used to test for these parameters, and methods that will be used to obtain representative samples of the waste to be analyzed.

### 1.B Sources

The OCFL generates non-hazardous leachate. There is no SIC code for sanitary landfill leachate.

The waste waters produced at the landfill include water collected from leachate collection system, which originates from water infiltration through waste, as well as condensate from the gas collection system. Fluids generated during well maintenance or testing activities may also be reinjected into the well. The waste stream is primarily composed of inorganic, non-hazardous compounds such as chloride, and potassium, with a historic total dissolved solids TDS of up to approximately 10,000 ppm.

Waste water is first accumulated in each landfill cell, then piped to a leachate collection tanks. Although some settling may occur and OCFL may elect to filter waste water prior to injection in the future, no waste treatment for regulatory purposes is performed at the tanks.

## 1.C Summary

The major components of the OCFLs waste characterization and underground injection control (UIC) monitoring program include:

- Volume Monitoring
- Sampling and Analysis
- Quality Assurance/Quality Control

These components are addressed in Sections 2 and 3, below.

The WAP may be reviewed and, if necessary, revised if conditions are identified that may significantly alter the chemical or physical properties of the waste. Revisions to the WAP may also be required if new permit conditions are added by the Agency for cause. Any future revisions to the WAP, upon approval, will become part of the administrative record and constitute a minor modification of the permit. Compatibility issues regarding the subsurface rock matrix and well construction materials are documented in the permit application and are not addressed in this WAP.

## 2.0 PROCEDURES

---

### 2.A Volume Monitoring

As discussed in the text of the Permit Application, flow and pressure recorders are to be used to continuously monitor injection pressure, annulus pressure, and flow rate; totalized cumulative volumes for the wells will be calculated from monitoring data. A summary of recorded data will be provided to the US EPA per applicable permit requirements. The remaining portions of this WAP address physical and chemical characterization of the waste.

### 2.B Waste Characterization

Waste analysis parameters were selected based on process knowledge, historical analysis, and analysis suggested by US EPA Region 5 guidance. These parameters include pH, TDS, TSS, specific gravity, and applicable organic toxicity characteristics. The pH is generally near neutral to basic (i.e., averaging 7.6 for analysis performed in 2015-2019, and ranging from 6.56 to 9.94). The total dissolved solids (TDS) concentration of the waste is also a useful indicator of fluid properties. Sodium and potassium are among the predominant cations and chloride is the predominant anion, with bicarbonate alkalinity also a major waste component. TDS average (2017-2019) ranges from approximately 5,700 to 10,000 mg/l. Because the native brine present in the injection zone contains relatively high TDS including high cation-anion concentration, injectate will have a lower TDS concentration than natural formation waters.

Testing for pH, specific gravity, and temperature will be performed weekly on days when waste is injected. Although only a limited number of chemical constituents are expected in injectate, a relatively comprehensive analysis will be performed on a quarterly basis. The leachate is non-hazardous and originates from a non-hazardous waste landfill, but a more comprehensive analysis will ensure the non-hazardous nature of injectate. Analysis excludes compounds such as pesticides or herbicides because historical process knowledge indicates that the wastewaters are not expected to contain measurable quantities of these compounds. Wastewater is not expected to be ignitable, reactive, or corrosive, but waste will be analyzed for flashpoint, reactive cyanide, and pH on a quarterly basis as a basic way to confirm the non-hazardous nature of the waste and to ensure any trends or changes are identified.

Table 2-1 of the following section lists the parameters and monitoring frequency used to characterize wastewater to be injected into the wells. Fluid to the injection wells will originate from the same tank, therefore tank sampling would be representative of injectate disposed in each well. The table also summarizes the



applicable analytical method and reporting units for each. Characterization parameters were selected based on historical leachate sampling and identified for characterization needed to satisfy regulatory requirements and applicable specifications listed in typical US EPA Region 5 non-hazardous UIC permits.

## 2.C Sampling and Analysis

Samples will be collected on a weekly or quarterly basis via grab sample from the waste injection flow line exiting the waste storage tank during calendar days or quarters when injection of waste takes place. The waste analysis to be conducted is designed to acquire representative samples of typical injectate. OCFL personnel, contractor personnel, or contracted analytical laboratory personnel will collect required on-site waste stream samples. Sampling procedures will be conducted at the direction of site representatives and in accordance with the certified or accredited analytical laboratory procedures, and will meet the minimum current standard US EPA procedures. As applicable, the grab sample will be sent to an independent contract laboratory for analysis. Sufficient mixing and residence time in the system will have occurred at this sampling point for the waste to be representative of the waste stream that is being injected. The sampler's name, sampling point, and date sampled will be documented using COC methods specified in Section 3.A.

Table 2-1 presents the parameters, analytical methods, reporting unit and sample frequency for each test parameter. Sampling and analytical methods will meet or exceed the standards cited below or as presented in US EPA "Methods for the Chemical Analysis of Water and Wastes" or "Standard Methods for the Examination of Water and Wastewater".

**TABLE 2-1  
OTTAWA COUNTY FARMS LANDFILL  
CLASS I WASTE SAMPLING AND ANALYSIS SUMMARY**

| Test Parameter                            | Example Test Methods*           | Reporting Units | Frequency                          |
|---|---------------------------------|-----------------|------------------------------------|
| Ignitability (flash point)                | SW846 1010, SW1010A             | ---             | Quarterly                          |
| Alkalinity (carbonate/bicarbonate), total | EPA 310.1                       | Mg/L            | Quarterly                          |
| Reactive Sulfide and Cyanide              | SW846 9010b, 376.1              | ---             | Quarterly                          |
| pH  | USEPA 150.1                     | pH units        | Weekly when wells are in operation |
| Specific Gravity                          | Hydrometer, ASTM 2710F, D5057   |                 | Weekly when wells are in operation |
| Temperature                               | Thermometer                     | °F              | Quarterly                          |
| TDS                                       | USEPA 160.1                     | mg/L            | Quarterly                          |
| TOC                                       | USEPA 415.1                     | mg/L            | Quarterly                          |
| <b>Select Characteristic Constituents</b> |                                 |                 |                                    |
| Benzene (D018)                            | USEPA 8260B/624                 | mg/L            | Quarterly                          |
| Carbon Tetrachloride (D019)               | USEPA 8260B/8021B               | mg/L            | Quarterly                          |
| Chlorobenzene (D021),                     | USEPA 8260B/8021B               | mg/L            | Quarterly                          |
| Chloroform (D022),                        | USEPA 8260B/8021B               | mg/L            | Quarterly                          |
| 1,4-Dichlorobenzene (D027)                | USEPA 8260B/8021B               | mg/L            | Quarterly                          |
| 1,2-Dichloroethane (D028)                 | USEPA 8260B/8021B               | mg/L            | Quarterly                          |
| Dichloroethylene (D029)                   | USEPA 8260B/8021B               | mg/L            | Quarterly                          |
| Methyl ethyl ketone (D035)                | USEPA 8260B/8261                | mg/L (ppm)      | Quarterly                          |
| Tetrachloroethylene (D039)                | USEPA 8260B/8021B               | mg/L            | Quarterly                          |
| Trichloroethylene (D040)                  | USEPA 8260B/8021B               | mg/L            | Quarterly                          |
| Vinyl Chloride (D043)                     | USEPA 8260B/8021B               | mg/L            | Quarterly                          |
| <b>Additional Parameters</b>              |                                 |                 |                                    |
| Potassium                                 | USEPA 200.8/6010                | mg/L            | Quarterly                          |
| Sodium                                    | USEPA 200.8/6010B, 6020A, 3005A | mg/L            | Quarterly                          |

| Test Parameter           | Example Test Methods*    | Reporting Units | Frequency |
|--------------------------|--------------------------|-----------------|-----------|
| Chloride                 | USEPA 325.2/A4500, 300.0 | mg/L            | Quarterly |
| Total inorganic nitrogen | USEPA 350.2, 300.0       | mg/L            | Quarterly |
| Ammonia (as nitrogen)    | USEPA 350.2, 300.0       | mg/L            | Quarterly |
| Arsenic (D004)           | USEPA 6000 series, 7080  | mg/L (ppm)      | Quarterly |
| Barium (D005)            | USEPA 6000 series        | mg/L (ppm)      | Quarterly |
| Cadmium (D006)           | USEPA 6000 series        | mg/L (ppm)      | Quarterly |
| Chromium (D007)          | USEPA 6000 series        | mg/L (ppm)      | Quarterly |
| Lead (D008)              | USEPA 6000 series        | mg/L (ppm)      | Quarterly |
| Mercury (D009)           | USEPA 6000 Series        | mg/L (ppm)      | Quarterly |
| Selenium (D010)          | USEPA 6000 Series        | mg/L (ppm)      | Quarterly |
| Silver (D011)            | USEPA 6000 Series        | mg/L (ppm)      | Quarterly |

Notes: \* Test methods cited are examples; alternative methods with equal or better detection limits may be used

Results of select analyses collected to satisfy Landfill Operating License are presented in Section H of the US EPA UIC Permit Application and are summarized in Section B.9 of the EGLE 625 mineral well application. As shown in these Sections, analysis shows that only a relatively few organic and inorganic constituents are detected, and inorganic parameters are analyzed on an annual basis as required by the Landfill Operating License. In addition, the waste will be sampled and analyzed for other parameters required by this WAP as shown in Table 2-1, including but not limited to pH, specific gravity, and temperature. Therefore, based on process knowledge and historical analytical results, the WAP parameter list provides analysis for 1) US EPA recommended parameters; 2) select TC compounds to ensure non-hazardous compliance, and 3) compounds typically present in injectate at significant concentrations (e.g., chloride).

It is important to note that OCFL is required to perform ongoing leachate analysis as part of landfill operating permits and requirements. OCFL may collect and analyze samples of injectate as described in this WAP, and share resulting data with operations to satisfy landfill operating permit requirements.

### **3.0 QUALITY ASSURANCE/QUALITY CONTROL**

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#### **3.A General Sampling and Analytical Information**

Sampling protocols outlined in this document are to be followed. OCFL is responsible for obtaining data necessary to comply with this WAP, and will ensure adherence to guidelines set forth in the referenced standards listed in Section 2.C or equivalents, as appropriate. Approved sample collection vessels and preservation techniques from 40 CFR 136.3 or equivalent will be followed as applicable and appropriate. These will include preservation in plastic or glass sample containers provided by the laboratory and storage in a sample refrigerator or cooler for shipment to the laboratory. OCFL reserves the option to choose alternate laboratories for testing provided equivalent QA/QC standards are met. The following applies to samples collected for laboratory analysis (i.e., quarterly analysis).

#### **COC Form Content**

Each sample taken will be accompanied by facility or contract laboratory Chain of Custody (COC) form that provides a record of sample handling starting with sample acquisition, documenting the process up to laboratory analysis. Samples taken are to be logged in the field using the COC, sealed, and delivered to the laboratory with a COC form. The COC form shall provide the following items collected by the sampler:

1. Sample ID including code or name, in addition to date and time;
2. Name of sample collector; (include sampling company name if not site personnel);
3. Sample collection method;
4. Sample collection date;
5. Sample collection point; and
6. Sample presentation technique, as applicable

Sample container label will also include a COC seal. Sample chain-of-custody will be followed at all times during the sampling and subsequent analysis. Chain-of-custody will be used to document the handling and control necessary to identify and trace a sample from collection through to final analytical results. Standard laboratory COC forms that document the times and dates of all personnel handling the sample, along with standard labels and container seals sufficient to distinguish between samples and prevent tampering, will be acceptable.

#### **Reporting and Records Retention**

Analytical reports and regulatory submittals regarding the nature and composition of injected fluids are to be maintained in the well files until authorization is obtained from

US EPA, in writing, to discard the records. All laboratory reports submitted to US EPA will include, at a minimum, the following:

1. Test description;
2. Analytical method for parameter detection;
3. Identification of analysis date and analyst;
4. Result and units; and
5. Analytical reporting limits.

The following sections present QA/QC parameters which will be followed to help to assure the adequacy of the sampling and analytical techniques for wellhead sampling and analysis described in this plan.

### **3.B Sampling Controls**

#### **1. Equipment Blanks**

Fluid samples will be obtained directly from the sample accumulation container before being sealed in the sample container shipped to the laboratory. In this case, no equipment cleaning blanks will be required. If samples cannot be directly placed in the bottles intended for preservation and shipment, equipment blanks will be taken as deemed appropriate by OCFL.

#### **2. Trip Blanks**

If the laboratory analysis is ever suspect because it contains anomalous parameters, trip blanks will be collected to assess in-transit contamination. The trip blank will consist of sample containers filled and sealed at the laboratory with laboratory-provided deionized (DI) water that accompany the sample containers used throughout the sampling event. The sample containers shall be handled in the same manner as the samples. The trip blank(s) will be sent to the laboratory for analysis of, at a minimum, the same parameters specified in the sampling plan above. A minimum of one (1) trip blank per sampling event will be utilized, when deemed necessary. At the discretion of OCFL, trip blanks may be submitted with any sample to verify representativeness of the sampling program.

#### **3. Sample Duplicates**

On advance written request of US EPA, duplicate samples will be taken to further assess the QA/QC program of the laboratory conducting the analysis. Such samples will be drawn from the same site from which primary samples will be taken consecutively from the same sampling tap or sample location to

ensure representativeness. The duplicate will be labeled with a sample number that will not conflict with the other samples, but will not be discernable to the laboratory as a duplicate sample. Upon the request of US EPA or at the discretion of site representatives, one duplicate sample per selected sampling event will be taken and analyzed for the same parameters as the sampling event.

### 3.C Analytical Controls

#### 1. Equipment Calibration

The selected analytical laboratories must maintain QA/QC records of the frequency and type of instrument calibration performed at the laboratory and in the field. Any calibration of thermometers, gauges, chromatographs, spectrometers and other analytical equipment will be conducted according to appropriate instrument manufacturer specifications and manufacturer recommended frequencies or as dictated by applicable laboratory QA/QC plans that have been developed by the laboratory. Valid calibration certificates for instruments used offsite by a certified lab will be maintained at that facility. Calibration data for onsite field testing or continuous monitoring will be maintained as part of the site well records.

#### 2. Data Reduction

Transcription of the raw data into the reportable units is conducted by the laboratory in accordance with the selected laboratory Q/A plan. Data reduction utilized in the analysis and reporting process is presented in the reports to the US EPA for each sampling and analysis event. Data is recorded on hand written or computer work sheets that include identification data, sample data and all data required for calculations, or on computer print-outs accompanied by operator notes and summaries.

#### 3. Data Verification

Data verification is conducted after each sampling event by assigned laboratory personnel and includes, at a minimum, review of chain-of-custody forms, equipment calibration records and data completeness. Spot checks of raw data versus reported data are performed to review math accuracy, significant numbers and reporting units. In addition, certified laboratory standard quality assurance/quality control requirements or checklists are utilized to verify individual test methods such as blanks, standards, and for comparisons of internal lab test duplicate results. Problems with any of these items will be indicated in the analytical report presented to the agency.

#### 4. Internal Quality Control

Per the laboratory QA/QC program, certified quality control samples from appropriate commercial sources or the US EPA, may be run periodically with sample batches. Internal quality control are addressed by disclosure of the laboratory's use of blanks, blind standards, matrix spikes and matrix spike duplicates, preparation of reagents, and laboratory duplicate or replicate analyses.

### 3.D Actions

#### 1. Corrective Actions

Corrective actions are implemented by laboratories if the analytical or sampling methods do not achieve plan objectives or data verification identifies inconsistencies in the results. Actions may entail re-sampling the waste stream and/or re-analyzing the fluid for a particular parameter, re-calibrating an analytical device, or other appropriate actions as dictated by the specific situation encountered. Action levels are typically taken in accordance with any applicable standards from USEPA "Methods for the Chemical Analysis of Water and Wastes" or "Standard Methods for the Examination of Water and Wastewater". OCFL representatives may, at their discretion, require re-sampling and retesting to confirm results that fall outside the historical range of expected analytical results, or outside equipment calibration curves.

#### 2. Reports to US EPA Region 5

Reports of waste analysis to US EPA will contain a table summarizing the sampling date, units and analytical result for each of the parameters listed in table 2-1 of this document. Additionally, analytical results (i.e., data), including chain of custody forms, will be submitted to US EPA.

### 3.E Re-Characterization

OCFL shall review the results of quarterly leachate analysis to ensure that injectate is sufficiently characterized. At the discretion of OCFL or at the written request of US EPA, re-characterization efforts may be conducted should a significant change occur in the injectate composition based on quarterly analyses, or if necessitated or required by process changes or new regulations.

The waste stream will be re-characterized as deemed necessary by OCFL if analyses shows a significant change in parameter concentration, particularly toxicity characteristic compound composition that might affect the non-hazardous nature of the waste. In this instance, sampling may be performed more frequently to obtain more

representative analysis of waste composition, to ensure that the overall composition of injectate is still non-hazardous. Any future revisions to the WAP, upon approval, will become part of the administrative record and constitute a minor modification of the permit upon submittal by OCFL.