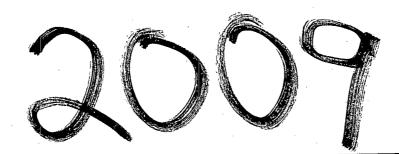
NM1 - 108

APPROVALS Disposition

YEAR(S):



Hansen, Edward J., EMNRD

From:Hansen, Edward J., EMNRDSent:Friday, March 06, 2009 1:27 PMTo:'marcella@industrialecosystems.com'Subject:JFJ Landfarm (NM1-10B) - Disposition of treated soils - Additional Sampling Required

Dear Ms. Marquez:

The New Mexico Oil Conservation Division (OCD) has received the request for "Disposition of accumulation of soils within the facility boundary" for the above-referenced site, dated February 10, 2009, and has conducted a review of the request. The request, received February 12, 2009, indicates that Industrial Ecosystems Inc. (IEI) has not completed the disposition of treated soils requirements. Therefore, the OCD cannot approve the request at this time for disposition of soils for above-referenced site, in accordance with 19.15.36 NMAC (Part 36). To proceed with the review and approval process, please complete the following:

ICI must collect soil samples and analyze the samples from each biopile proposed to be dismantled for all 12 metals listed (excluding U) in Subsections A and B of 20.6.2.3103 NMAC (WQCC rule) in accordance with 19.15.36.15.F.(5) NMAC. This will necessitate the collection of at least one background sample (located over a pipeline right-of-way) for the metals listed in Subsections A & B of 20.6.2.3103 NMAC since background has not been established for these constituents. Please submit the results of the biopile sampling and background sampling to the OCD for review and approval. ICI may be required to propose alternative closure standards in accordance with 19.15.36.15.F.(5) NMAC.

In addition, ICI must collect soil samples and analyze the samples from each biopile proposed to be dismantled for TPH using EPA method 418.1 in accordance with 19.15.36.15.F.(3) NMAC. Please submit the results of the biopile sampling to the OCD for review and approval.

Also, ICI must submit to the OCD written confirmation from the respective pipeline operators granting approval to spread treated soil onto right-of-ways located within the facility boundaries.

Please keep in mind that ICI must follow the conditions of their permit even if the conditions differ from Part 36. However, if the permit is silent (e.g., no alternate concentration or specific waiver granted) regarding a specified requirement in Part 36, then ICI must also follow the requirements of Part 36.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen Hydrologist Environmental Bureau



P.O. Box 2043 Farmington, NM 87499

Industrial Ecosystems Inc. Soil Reclamation Center

Phone: (505) 632-1782 Fax: (505) 632-1876 #49 CR 3150 2009 FEBALLEC, NM \$ 141037

February 10, 2009

Brad Jones, Environmental Engineer NM Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, NM 87505

Re: JFJ Landfarm Permit # NM01-0010B Disposition of accumulation of soils within the facility boundary

Dear Brad:

This letter is being submitted to you as a reply to your concerns regarding "excessive accumulation of soils within the facility boundary". Attached you will find our "Action Plan to Address Disposition of Remediated Soils within the Facility Boundary".

<u>Transitional Provision (19.15.36.20) NMAC</u> Existing permitted facilities. Surface waste management facilities in operation prior to the effective date of 19.15.36 NMAC pursuant to division permits or orders may continue to operate in accordance with such permits or orders, subject to the following provisions.

A. Existing surface waste management facilities shall comply with the operational, waste acceptance and closure requirements provided in 19.15.36 NMAC, *except as otherwise specifically provided in the applicable permit or order*, or in a specific waiver, exception or agreement that the division has granted in writing to the particular surface waste management facility.

Landfarm & Composting Operation As per #17 of our current permit – "Compost piles may not be dismantled until a laboratory measurement of total petroleum hydrocarbons (TPH) in the compost pile is less than 100 parts per million (ppm), the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations must be maintained at the facility. Authorization from the OCD must be obtained prior to dismantling of the compost pile and/or removal or reuse of the remediated soils."

As per the Transitional Provision (19.15.36.20) NMAC, Industrial Ecosystems, Inc. will continue to operate in accordance with our current permit regarding dismantling of compost piles for removal and or reuse of the remediated soils. Attached you will find our "*Action Plan to Address Disposition of Remediated Soils within the Facility Boundary*".

If you should have any questions or if additional information is needed, please feel free to contact me at the above listed telephone number.

Respectfully Submitted,

marcueamarquez

Marcella Marquez Administrative Officer

Attachment(s)



Industrial Ecosystems Inc. Soil Reclamation Center

P.O. Box 2043 Farmington, NM 87499 Phone: (505) 632-1782 Fax: (505) 632-1876 #49 CR 3150 Aztec, NM 87410

Industrial Ecosystems, Inc. /JFJ Landfarm Permit # NM01-0010B "Action Plan to Address Disposition of Remediated Soils Within the Facility Boundary"

IEI/JFJ Landfarm is aware that a plan to address disposition of remediated soils within the facility boundaries is prudent and we are committed to working with the NMOCD to address this concern.

The *objective* of the action plan is to reduce accumulation of remediated soils within the facility boundaries. The *purpose* of the action plan is to describe the methods which will be used to reduce the accumulation of remediated soils within the facility boundaries.

The action plan currently addresses three methods for dismantling, disposal and/or reuse of the *remediated compost piles*. It should be considered a living document as additional methods are being researched and the plan will evolve as these methods are developed. The action plan only addresses methods for dismantling/disposal/reuse of *remediated compost piles* as IEI/JFJ Landfarm will continue to process untreated waste in accordance with our current permit.

As per our current permit <u>Landfarm & Composting Operation, #17</u>. – "Compost piles may not be dismantled until a laboratory measurement of total petroleum hydrocarbons (TPH) in the compost pile is less than 100 parts per million (ppm), the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations must be maintained at the facility. Authorization from the OCD must be obtained prior to dismantling of the compost pile and/or removal or reuse of the remediated soils."

Disposition of remediated compost piles – Upon receipt of analytical reports confirming the compost piles have met the requirements listed in <u>Landfarm & Composting Operation</u>, # 17, the following methods will be used to dismantle, dispose of and/or reuse the remediated soils:

- 1. Remediated Compost Piles will be reused -
 - A. IEI has contacted pipeline operators to obtain approval to spread remediated soils onto right-of-ways located within the facility boundaries. The use of this method will help to reduce remediated soils on the facility while also providing extra coverage and protection to the pipelines.
 - B. IEI will also continue to reuse remediated soils to mix/solidify incoming liquid waste.
- 2. **Remediated Compost Piles will be dismantled and/or disposed of** IEI will transport remediated soils to acquired property, located outside of the facility boundaries. The remediated soils will be spread and compacted on the property. The use of this method will reduce the amount of remediated soils on the facility.

NMOCD will be provided with updates to this plan as modifications are made.



P.O. Box 2043 Farmington, NM 87499

February 10, 2009

Brad A. Jones Environmental Bureau NM Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, New Mexico 87505

RE: Dismantling of Compost Pile(s)

Dear Brad:

Recent analytical results show the following biopiles have reached acceptable levels as specified by our permit:

Elm Ridge # 4	Basin # 12
Conoco # 26	Williams # 48
Basin # 54	Red Willow # 60
Basin # 67	Basin # 212
Burlington # 516	Burlington # 518
Dugan # 557	Basin # 559
Burlington # 571	Burlington # 612
Burlington # 625	Community # 655
Graves # 105-B	

Attached you will find copies of all applicable analytical reports (DRO, GRO, BTEX and chloride levels) for each of these biopiles.

As per our "Action Plan to Address Disposition of Accumulation of Soils within the Facility **Boundary**", it is our intent to spread the above listed compost piles onto the pipeline right-of-ways within the facility boundaries.

Please contact me at the above listed number with any questions or concerns with this request.

Respectfully Submitted,

Marcueamarquez

Marcella Marquez Administrative Officer

Attachment(s)

Phone: (505) 632-1782 Fax: (505) 632-1876 2009 F #49 & 31681 11 37 Aztec, NM 87410

Hall Envir	ronmental Anal	ysis Labora	tory, II	nc.	×	Date: 12-D	ec-08
CLIENT:	Industrial Ecosyster	ms, Inc.		Clier	it Sample I	D: Elmridge	: #4
Lab Order:	0811466			Co	llection Dat	te: 11/24/20	08 8:31:00 AM
Project:	JFJ Land Farm			D	ate Receive	ed: 11/26/20	08
Lab ID:	0811466-01				Matr	ix: SOIL	
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD	300.0: ANIONS			ann an sinne a' subatat			Analyst: RAGS
Chloride		260	3.0		mg/Kg	10	12/11/2008 10:44:46 PM

AL	YT	ICA	40
		2008	D
PA	1551	ED	

Qualifiers:

* Value exceeds Maximum Contaminant Level Е Estimated value

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

S Spike recovery outside accepted recovery limits

Analyte detected in the associated Method Blank В

Holding times for preparation or analysis exceeded Н

Page 1 of 25

MCL Maximum Contaminant Level

RL Reporting Limit

1

CLIENT: Industrial Ecosystems, 1		Client Sample ID:	Elmric	lge #4	
Lab Order: 0705249 Collection Dat				5/15/2	007 10:06:00 AM
Project: JFJ Land Farm			Date Received:	5/17/2	007
Lab ID: 0705249-02			Matrix:	SOIL	
Analyses	Result	PQL Qua	al Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE O	RGANICS				Analyst: SCC
Diesel Range Organics (DRO)	ND	10	mg/Kg	1	5/18/2007 4:13:54 PM
Surr: DNOP	96.7	61.7-135	%REC	1	5/18/2007 4:13:54 PM
EPA METHOD 8015B: GASOLINE RANG	E				Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0	mg/Kg	1	5/18/2007 4:40:00 PM
Surr: BFB	111	84-138	%REC	1	5/18/2007 4:40:00 PM
EPA METHOD 8021B: VOLATILES					Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10	mg/Kg	1	5/18/2007 4:40:00 PM
Benzene	ND	0.050	mg/Kg	1	5/18/2007 4:40:00 PM
Toluene	ND	0.050	mg/Kg	1	5/18/2007 4:40:00 PM
Ethylbenzene	ND	0.050	mg/Kg	1	5/18/2007 4:40:00 PM
Xylenes, Total	ND	0.10	mg/Kg	1	5/18/2007 4:40:00 PM
Surr: 4-Bromofluorobenzene	86.6	68.2-109	%REC	1	5/18/2007 4:40:00 PM

Date: 21-May-07

PASSED

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

В

Hall Envir	onmental Anal	ysis Labora	tory, In	1C.	D	ate: 12-Dec	-08
CLIENT:	Industrial Ecosyster	ns, Inc.		Clier	it Sample ID	Basin #12	
Lab Order:	0811466			Co	llection Date	: 11/24/2008	8 8:50:00 AM
Project:	JFJ Land Farm			D	ate Received	: 11/26/2008	3
Lab ID:	0811466-02				Matrix	: SOIL	
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD	300.0: ANIONS				nalan tasahadaha yang dalam ta kumpanan da		Analyst: RAGS
Chloride		64	0.30		mg/Kg	1	12/10/2008 2:57:04 PM

NALYTICALO
PASSED

Qualifiers:

Value exceeds Maximum Contaminant Level * Е Estimated value

- Analyte detected below quantitation limits J
- ND Not Detected at the Reporting Limit
- Spike recovery outside accepted recovery limits S
- В Analyte detected in the associated Method Blank

Date: 12-Dec-08

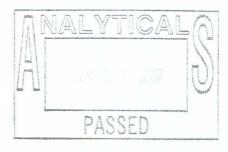
- Holding times for preparation or analysis exceeded Η
- MCL Maximum Contaminant Level
- RL Reporting Limit

Page 2 of 25

2

Date: 21-May-07

CLIENT: Lab Order: Project: Lab ID:	Industrial Ecosystems, L 0705249 JFJ Land Farm 0705249-05	nc.		Client Sample ID: Collection Date: Date Received: Matrix:	5/15/2 5/17/2	2007 10:40:00 AM 2007
Analyses		Result	PQL Qua	al Units	DF	Date Analyzed
EPA METHOD	8015B: DIESEL RANGE O	RGANICS				Analyst: SCC
Diesel Range (Organics (DRO)	ND	10	mg/Kg	1	5/18/2007 5:57:07 PM
Surr: DNOP		79.3	61.7-135	%REC	1	5/18/2007 5:57:07 PM
EPA METHOD	8015B: GASOLINE RANG	E				Analyst: NSB
Gasoline Rang	e Organics (GRO)	ND	5.0	mg/Kg	1	5/18/2007 7:10:34 PM
Surr: BFB		112	84-138	%REC	1	5/18/2007 7:10:34 PM
EPA METHOD	8021B: VOLATILES					Analyst: NSB
Methyl tert-but	yl ether (MTBE)	ND	0.10	mg/Kg	1	5/18/2007 7:10:34 PM
Benzene		ND	0.050	mg/Kg	1	5/18/2007 7:10:34 PM
Toluene		ND	0.050	mg/Kg	1	5/18/2007 7:10:34 PM
Ethylbenzene		ND	0.050	mg/Kg	1	5/18/2007 7:10:34 PM
Xylenes, Total		ND	0.10	mg/Kg	1	5/18/2007 7:10:34 PM
Surr: 4-Bron	nofluorobenzene	87.0	68.2-109	%REC	1	5/18/2007 7:10:34 PM



Qualifiers:

- Value exceeds Maximum Contaminant Level *
- Е Value above quantitation range J
- Analyte detected below quantitation limits ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- В Analyte detected in the associated Method Blank
- Н Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Page 5 of 16

Date: 12-Dec-08

CLIENT:Industrial EcosystemLab Order:0811466Project:JFJ Land FarmLab ID:0811466-13	ns, Inc.		Date Receive		08 12:30:00 PM
Analyses	Result	PQL	Qual Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANG	E ORGANICS	na kanangan kulurang si kanang kulung kulung k	anna a' faoinn a' faoinn a chuir, dheadan a' gu dheann ann ann an ann an an an an an an ann an a		Analyst: SCC
Diesel Range Organics (DRO)	ND	10	mg/Kg	1	12/2/2008
Surr: DNOP	83.5	61.7-135	%REC	1	12/2/2008
EPA METHOD 8015B: GASOLINE RA	NGE				Analyst: DAM
Gasoline Range Organics (GRO)	ND	5.0	mg/Kg	1	12/3/2008 1:37:54 PM
Surr: BFB	92.3	58.8-123	%REC	1	12/3/2008 1:37:54 PM
EPA METHOD 8021B: VOLATILES					Analyst: DAM
Benzene	ND	0.050	mg/Kg	1	12/3/2008 1:37:54 PM
Toluene	ND	0.050	mg/Kg	1	12/3/2008 1:37:54 PM
Ethylbenzene	ND	0.050	mg/Kg	1	12/3/2008 1:37:54 PM
Xylenes, Total	ND	0.15	mg/Kg	1	12/3/2008 1:37:54 PM
Surr: 4-Bromofluorobenzene	103	66.8- <mark>1</mark> 39	%REC	1	12/3/2008 1:37:54 PM



*

Qualifiers:

E Estimated value

- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

Value exceeds Maximum Contaminant Level

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Page 13 of 25

CLIENT: Lab Order: Project: Lab ID:	Industrial Ecosystems, In 0809404 JFJ Land Farm 0809404-24	nc.	Client Sample ID: Conco Collection Date: 9/16/2 Date Received: 9/19/2 Matrix: SOIL			e: 9/16/2008 d: 9/19/2008	
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD	8015B: DIESEL RANGE O	RGANICS					Analyst: SCC
Diesel Range C	Organics (DRO)	310	100		mg/Kg	10	9/23/2008
Surr: DNOP		0	61.7-135	S	%REC	10	9/23/2008
EPA METHOD	8015B: GASOLINE RANGI	E, K A					Analyst: DAM
Gasoline Range	e Organics (GRO)	ND	5.0		mg/Kg	1	9/25/2008 12:25:27 AM
Surr: BFB		83.8	58.8-123		%REC	1	9/25/2008 12:25:27 AM
EPA METHOD	300.0: ANIONS						Analyst: SLB
Chloride		170	3.0		mg/Kg	10	9/29/2008 3:12:56 PM

Date: 01-Oct-08

Qualifiers:

* Value exceeds Maximum Contaminant Level

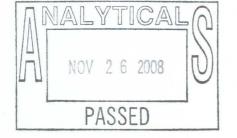
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded

MCL Maximum Contaminant Level

RL Reporting Limit

CLIENT:	Industrial Ecosystems, Inc.		ms, Inc. Client Sample ID:				Williams #48		
Lab Order:	0811466	0811466			lection Dat	e: 11/24/200	8 9:15:00 AM		
Project: JFJ Land Farm			Date Received: 11/26/2008				8		
Lab ID:	0811466-03		Matrix:			x: SOIL			
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed		
EPA METHOD	300.0: ANIONS		an ann an Air an Airtean			nanti - Al-Cicara no anima al ba	Analyst: RAGS		
Chloride		93	0.30		mg/Kg	1	12/10/2008 3:14:28 PM		

Date: 12-Dec-08



Qualifiers:

* Value exceeds Maximum Contaminant LevelE Estimated value

- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded

Page 3 of 25

- MCL Maximum Contaminant Level
- RL Reporting Limit

CLIENT:	Industrial Ecosystem	s, Inc.		C	Client Sample ID:	Willia	ms #48
Lab Order:	0705249				Collection Date:	5/15/2	007 11:32:00 AM
Project:	JFJ Land Farm				Date Received:	5/17/2	007
Lab ID:	0705249-08				Matrix:	SOIL	
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD	8015B: DIESEL RANGE	ORGANICS					Analyst: SCC
Diesel Range C	Draanics (DRO)	ND	10		mg/Kg	1	5/18/2007 7:41:06 PM
Surr: DNOP		87.7	61.7-135		%REC	1	5/18/2007 7:41:06 PM
EPA METHOD	8015B: GASOLINE RA	NGE					Analyst: NSB
Gasoline Rang	e Organics (GRO)	ND	5.0		mg/Kg	1	5/18/2007 9:40:38 PM
Surr: BFB		110	84-138		%REC	1	5/18/2007 9:40:38 PM
EPA METHOD	8021B: VOLATILES						Analyst: NSB
Methyl tert-buty	yl ether (MTBE)	ND	0.10		mg/Kg	1	5/18/2007 9:40:38 PM
Benzene		ND	0.050		mg/Kg	1	5/18/2007 9:40:38 PM
Toluene		ND	0.050		mg/Kg	1	5/18/2007 9:40:38 PM
Ethylbenzene		ND	0.050		mg/Kg	1	5/18/2007 9:40:38 PM
Xylenes, Total		ND	0.10		mg/Kg	1	5/18/2007 9:40:38 PM
Surr: 4-Brom	nofluorobenzene	85.9	68.2-109		%REC	1	5/18/2007 9:40:38 PM

	IAL	Y	T		
	MAY	9. 7. 5m	direct the	2007	D
a start	P/	15	SE	ED	

Qualifiers:

- Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank

Date: 21-May-07

- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Envir	onmental Analy	ysis Labora	tory, Iı	nc.	Date: 11-No	v-08	
CLIENT:	Industrial Ecosyster		Client Sample ID: Basin #54				
Lab Order:	0810611 JFJ Land Farm			Collection Date: 10/29/2008 9:30:00 A			
Project:			Date Received: 10/30/2008				
Lab ID:	0810611-05						
Analyses		Result	PQL	Qual Units	DF	Date Analyzed	
EPA METHOD	300.0: ANIONS					Analyst: SLB	
Chloride		440	3.0	mg/Kg	- 10	11/10/2008 11:42:08 AM	

	JALYTICAL	0
	OCT 3 0 2008	U
L	PASSED	

Qualifiers:

Value exceeds Maximum Contaminant Level * E Estimated value

- Analyte detected below quantitation limits J
- ND Not Detected at the Reporting Limit
- Spike recovery outside accepted recovery limits S
- В Analyte detected in the associated Method Blank

Date: 11-Nov-08

- Η Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

CLIENT:	Industrial Ecosystems, In	nc.		Client Sample	e ID: Ba	Basin #54 4/25/2007 10:10:00 AM		
Lab Order:	0704405			Collection D	ate: 4/2			
Project:	JFJ Land Farm			Date Recei	ved: 4/2	26/2007		
Lab ID:	0704405-09			Ma	trix: SO	DIL		
Analyses		Result	PQL Q	ual Units	DF	Date Analyzed		
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC		
Diesel Range Org	ganics (DRO)	75	10	mg/Kg	1	4/28/2007 7:20:53 PM		
Surr: DNOP		105	61.7-135	%REC	1	4/28/2007 7:20:53 PM		
EPA METHOD 8	015B: GASOLINE RANGE	1				Analyst: NSB		
Gasoline Range	Organics (GRO)	ND	5.0	mg/Kg	1	4/27/2007 4:03:39 PM		
Surr: BFB		113	84-138	%REC	1	4/27/2007 4:03:39 PM		
EPA METHOD 8	021B: VOLATILES					Analyst: NSB		
Methyl tert-butyl	ether (MTBE)	ND	0.10	mg/Kg	1	4/27/2007 4:03:39 PM		
Benzene		ND	0.050	mg/Kg	1	4/27/2007 4:03:39 PM		
Toluene		ND	0.050	mg/Kg	, 1	4/27/2007 4:03:39 PM		
Ethylbenzene		ND	0.050	mg/Kg	1	4/27/2007 4:03:39 PM		
Xyl <mark>enes, Tota</mark> l		ND	0.10	mg/Kg	1	4/27/2007 4:03:39 PM		
Surr: 4-Bromot	fluorobenzene	90.0	68.2-109	%REC	1	4/27/2007 4:03:39 PM		

Date: 30-Apr-07

Qualifiers:

* Value exceeds Maximum Contaminant Level

E Value above quantitation range

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

S Spike recovery outside accepted recovery limits 9 / 18

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded

MCL Maximum Contaminant Level

RL Reporting Limit

Hall Envir	conmental Analys	sis Laborat	atory, Inc. Date: 12-Dec-08				
CLIENT: Industrial Ecosystems, Inc.				Client Sample ID: R			w #60
Lab Order:	0811466			Co	llection Dat	e: 11/24/200	8 9:30:00 AM
Project:	JFJ Land Farm			D	ate Receive	d: 11/26/200	8
Lab ID:	0811466-04				Matri	x: SOIL	
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD	300.0: ANIONS		and a second second				Analyst: RAGS
Chloride		140	3.0		mg/Kg	10	12/11/2008 11:02:10 PM

VAL	Y	T		50
NOV	2	6	2008	D
P	AS	SI	ED	

Qualifiers:

* Value exceeds Maximum Contaminant Level Е Estimated value

- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- Spike recovery outside accepted recovery limits S
- В Analyte detected in the associated Method Blank

Date: 12-Dec-08

- Н Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

CLIENT:						Red willow 60		
Lab Order:	0703336						3/21/2007 10:20:00 AM	
Project:	JFJ Land Farm				Date Received:	3/22/20	007	
Lab ID:	0703336-05				Matrix:	SOIL		
Analyses	2	Result	PQL	Qual	Units	DF	Date Analyzed	
EPA METHOD 8015B: DIESEL RANGE ORGANICS							Analyst: SCC	
Diesel Range Or	ganics (DRO)	11	10		mg/Kg	1	3/26/2007 9:05:54 PM	
Surr: DNOP		96.0	61.7-135		%REC	1	3/26/2007 9:05:54 PM	
EPA METHOD 8	015B: GASOLINE RANGE						Analyst: NSB	
Gasoline Range	Organics (GRO)	ND	5.0		mg/Kg	1	3/26/2007 1:44:15 PM	
Surr: BFB		112	84-138		%REC	1	3/26/2007 1:44:15 PM	
EPA METHOD 8	021B: VOLATILES						Analyst: NSB	
Methyl tert-butyl	ether (MTBE)	ND	0.10		mg/Kg	1	3/26/2007 1:44:15 PM	
Benzene		ND	0.050		mg/Kg	1	3/26/2007 1:44:15 PM	
Toluene		ND	0.050		mg/Kg	1	3/26/2007 1:44:15 PM	
Ethylbenzene		ND	0.050		mg/Kg	>1	3/26/2007 1:44:15 PM	
Xylenes, Total		ND	0.10		mg/Kg	1	3/26/2007 1:44:15 PM	
Surr: 4-Bromo	ofluorobenzene	91.4	68.2-109		%REC	1	3/26/2007 1:44:15 PM	

NALY ICA MAR 2 8 2007 PASSED

Qualifiers:

- * Value exceeds Maximum Contaminant Level Е Value above quantitation range
- J
- Analyte detected below quantitation limits ND Not Detected at the Reporting Limit
- S
- Spike recovery outside accepted recovery limits
- В Analyte detected in the associated Method Blank

Date: 28-Mar-07

- Holding times for preparation or analysis exceeded Н
- MCL Maximum Contaminant Level
- RL Reporting Limit

5/15

CLIENT: Industrial Ecosystems, Inc. Client Sample ID: Basin #67 Lab Order: 0811466 Collection Date: 11/24/2008 1:25:00 PM **Project:** JFJ Land Farm Date Received: 11/26/2008 Matrix: SOIL 0811466-16 Lab ID: Result PQL Qual Units DF **Date Analyzed** Analyses EPA METHOD 8015B: DIESEL RANGE ORGANICS Analyst: SCC Diesel Range Organics (DRO) 10 ma/Ka 1 12/2/2008 ND Surr: DNOP 85.6 %REC 12/2/2008 61.7-135 1 **EPA METHOD 8015B: GASOLINE RANGE** Analyst: DAM Gasoline Range Organics (GRO) 12/3/2008 3:09:24 PM ND 5.0 mg/Kg 1 Surr: BFB 92.9 %REC 12/3/2008 3:09:24 PM 58.8-123 1 **EPA METHOD 8021B: VOLATILES** Analyst: DAM Benzene ND 0.050 12/3/2008 3:09:24 PM mg/Kg 1 Toluene ND 0.050 mg/Kg 1 12/3/2008 3:09:24 PM 0.050 Ethylbenzene ND mg/Kg 1 12/3/2008 3:09:24 PM Xylenes, Total ND 0.15 mg/Kg 1 12/3/2008 3:09:24 PM Surr: 4-Bromofluorobenzene 102 66.8-139 %REC 12/3/2008 3:09:24 PM 1 EPA METHOD 300.0: ANIONS Analyst: RAGS Chloride 16 0.30 12/10/2008 7:18:13 PM mg/Kg 1

Hall Environmental Analysis Laboratory, Inc.

PASSED

Oualifiers:

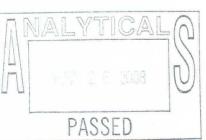
- E Estimated value
- J Analyte detected below quantitation limits
- Not Detected at the Reporting Limit ND
- S Spike recovery outside accepted recovery limits

Value exceeds Maximum Contaminant Level

- B Analyte detected in the associated Method Blank
- Η Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Page 16 of 25

Date: 12-Dec-08



*

CLIENT: Lab Order: Project: Lab ID:	Industrial Ecosystems, 0811466 JFJ Land Farm 0811466-05	Inc.		Client Sample II Collection Dat Date Receive Matri	e: 11/24/200	08 9:45:00 AM
Analyses		Result	PQL	Qual Units	DF	Date Analyzed
EPA METHOD	300.0: ANIONS	430	3.0	mg/Kg	10	Analyst: RAGS
					ъ	
NALY	TICAL 6 2008					
PAS	SSED					

Date: 12-Dec-08

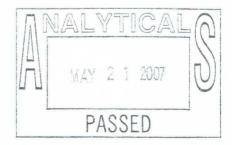
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- Spike recovery outside accepted recovery limits S
- MCL Maximum Contaminant Level
- RL Reporting Limit

Page 5 of 25

5

CLIENT: Lab Order: Project: Lab ID:				Date Received	e: 5/15/2	2007 12:00:00 PM 2007
Analyses		Result	PQL Q	ual Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Di <mark>esel Range C</mark>	Organics (DRO)	ND	10	mg/Kg	1	5/18/2007 9:59:50 PM
Surr: DNOP		87.3	61.7-135	%REC	1	5/18/2007 9:59:50 PM
EPA METHOD	8015B: GASOLINE RAM	NGE				Analyst: NSB
Gasoline Range	e Organics (GRO)	ND	5.0	mg/Kg	1	5/18/2007 10:40:51 PM
Surr: BFB		111	84-138	%REC	1	5/18/2007 10:40:51 PM
EPA METHOD	8021B: VOLATILES					Analyst: NSB
Methyl tert-buty	d ether (MTBE)	ND	0.10	mg/Kg	1	5/18/2007 10:40:51 PM
Benzene		ND	0.050	mg/Kg	1	5/18/2007 10:40:51 PM
Toluene		ND	0.050	mg/Kg	1	5/18/2007 10:40:51 PM
Ethylbenzene		ND	0.050	mg/Kg	້ 1	5/18/2007 10:40:51 PM
Xylenes, Total		ND	0.10	mg/Kg	1	5/18/2007 10:40:51 PM
Surr: 4-Brom	ofluorobenzene	86.3	68.2-109	%REC	1	5/18/2007 10:40:51 PM

Date: 21-May-07



Qualifiers:

Value exceeds Maximum Contaminant Level

- E Value above quantitation range
- J Analyte detected below quantitation limits

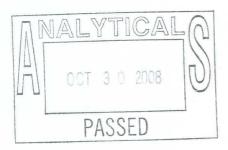
ND Not Detected at the Reporting Limit

- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level

RL Reporting Limit

10/19

Hall Envir	onmental Analy	ysis Laborat	atory, Inc. Date: 11-Nov-08				
CLIENT: Industrial Ecosystems, Inc.			C	lient Sample II	: Burlingto	n #516	
Lab Order:	Order: 0810611		Collection Date: 10/29/2008 10:15:00			08 10:15:00 AM	
Project:	JFJ Land Farm			Date Received	1: 10/30/200)8	
Lab ID:	0810611-08		Date Received: 10/30/2008 Matrix: SOIL				
Analyses		Result	PQL Q	ual Units	DF	Date Analyzed	
EPA METHOD	300.0: ANIONS					Analyst: SLE	
Chloride		95	0.30	mg/Kg	1	11/7/2008 7:27:29 PM	



Qualifiers:

* Value exceeds Maximum Contaminant Level

E Estimated value

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

CLIENT: Lab Order: Project: Lab ID:	Industrial Ecosystem 0705249 JFJ Land Farm 0705249-14	s, Inc.	Client Sample ID: E Collection Date: 5 Date Received: 5 Matrix: S		5/15/2 5/17/2	5/15/2007 1:00:00 PM 5/17/2007		
Analyses		Result	PQL	Qual U	nits	DF	Date Analyzed	
EPA METHOD	8015B: DIESEL RANGE	ORGANICS					Analyst: SCC	
Diesel Range O	rganics (DRO)	ND	10	m	g/Kg	1	5/20/2007 2:04:10 PM	
Surr: DNOP		98.1	61.7-135	%	REC	1	5/20/2007 2:04:10 PM	
EPA METHOD	8015B: GASOLINE RAI	NGE					Analyst: NSB	
Gasoline Range	e Organics (GRO)	ND	5.0	m	ig/Kg	1	5/19/2007 12:40:46 AM	
Surr: BFB		111	84-138	%	REC	1	5/19/2007 12:40:46 AM	
EPA METHOD	8021B: VOLATILES						Analyst: NSB	
Methyl tert-buty	l ether (MTBE)	ND	0.10	m	ig/Kg	1	5/19/2007 12:40:46 AM	
Benzene		ND	0.050	m	ig/Kg	1	5/19/2007 12:40:46 AM	
Toluene		ND	0.050	m	ig/Kg	1	5/19/2007 12:40:46 AM	
Ethylbenzene		ND	0.050	m	ig/Kg	1	5/19/2007 12:40:46 AM	
Xylenes, Total		ND	0.10	m	ig/Kg	1	5/19/2007 12:40:46 AM	
Surr: 4-Brom	ofluorobenzene	86.5	68.2-109	%	REC	1	5/19/2007 12:40:46 AM	

Date: 21-May-07

	IAL	YT	'ICA	LQ
	× 4 V	2	2007	D
-	P	ASS	ED	

Qualifiers:

*

- Value exceeds Maximum Contaminant Level
- E Value above quantitation range J
- Analyte detected below quantitation limits ND Not Detected at the Reporting Limit
- S
- Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- Η Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

14/19

Page 14 of 16

the second se	the second s					the second	and a second		
CLIENT:	Industrial Ecosystem	ns, Inc.	Client Sample ID: Burlington #518						
Lab Order:	Order: 0811466			Col	lection Dat	te: 11/24/2008	11/24/2008 10:42:00 AM		
Project: JFJ Land Farm			Date Received:			d: 11/26/2008			
Lab ID:	0811466-08	Matrix: SOIL							
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed		
EPA METHOD	300.0: ANIONS		Charlen and Sold Charles and Charles	North Contract Contraction	All and a low and an and a low and a low a low a		Analyst: R	AGS	
Chloride		220	3.0		mg/Kg	10	12/12/2008 12:46:39	9 AM	

MALYTICAL NOV 2 6 2008 PASSED

Qualifiers:

Value exceeds Maximum Contaminant Level
E Estimated value

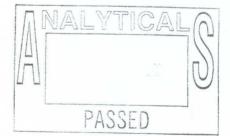
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank

Date: 12-Dec-08

- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

8

CLIENT: Lab Order: Project: Lab ID:	Industrial Ecosystems, I 0702228 JFJ Land Farm 0702228-08	lnc.			lient Sample ID: Collection Date: Date Received: Matrix:	2/20/20 2/21/20	007 9:15:00 AM
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD	8015B: DIESEL RANGE O	RGANICS					Analyst: SCC
Diesel Range O	rganics (DRO)	23	10		mg/Kg	1	2/21/2007 9:08:53 PM
Surr: DNOP		90.0	61.7-135		%REC	1	2/21/2007 9:08:53 PM
EPA METHOD	8015B: GASOLINE RANG	E					Analyst: NSB
Gasoline Range	Organics (GRO)	ND	5.0		mg/Kg	1	2/22/2007 12:32:09 AM
Surr: BFB		107	84-138		%REC	1	2/22/2007 12:32:09 AM
EPA METHOD	8021B: VOLATILES						Analyst: NSB
Methyl tert-buty	l ether (MTBE)	ND	0.10		mg/Kg	1	2/22/2007 12:32:09 AM
Benzene		ND	0.050		mg/Kg	1	2/22/2007 12:32:09 AM
Toluene		ND	0.050		mg/Kg	1	2/22/2007 12:32:09 AM
Ethylbenzene		ND	0.050		mg/Kg	1	2/22/2007 12:32:09 AM
Xylenes, Total		ND	0.10		mg/Kg	1	2/22/2007 12:32:09 AM
Surr: 4-Brom	ofluorobenzene	90.1	68.2-109	1	%REC	1	2/22/2007 12:32:09 AM



Qualifiers:	*	Value exceeds Maximum Contaminant Level
	E	Value above quantitation range

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

- S Spike recovery outside accepted recovery limits 8/14
- B Analyte detected in the associated Method Blank

Date: 22-Feb-07

H Holding times for preparation or analysis exceeded

MCL Maximum Contaminant Level

RL Reporting Limit

Hall Envir	onmental Analysi	s Laborat	tory, Ir	ıc.		Date: 12-Dec	c-08
CLIENT: Industrial Ecosystem Lab Order: 0811466		is, Inc. Client Sa		t Sample I	Sample ID: Dugans #557		
			Collection Date:			te: 11/24/200	11/24/2008 11:02:00 AM
Project:	JFJ Land Farm		Date Received: 11/26/2008				
Lab ID:	0811466-09			Matrix: SOIL			
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
•/	300.0: ANIONS	600	3.0		mg/Kg	10	Analyst: RAGS 12/12/2008 1:04:04 AM

MN	AL	71	CA	40
		2.6	2008	D
	Pi	45S1	ED	

Qualifiers:

Value exceeds Maximum Contaminant Level * E Estimated value

Analyte detected below quantitation limits J

ND Not Detected at the Reporting Limit

- Spike recovery outside accepted recovery limits S
- Analyte detected in the associated Method Blank В
- Holding times for preparation or analysis exceeded Н
- MCL Maximum Contaminant Level

RL Reporting Limit

9

CLIENT:	Industrial Ecosystem	e Inc		Client Sampl	Dugo	n 557
		s, mc.			Ŭ	
Lab Order:	0702228			Collection]	Date: 2/20/2	2007 9:48:00 AM
Project:	JFJ Land Farm			Date Rece	ived: 2/21/2	2007
Lab ID:	0702228-10			Ma	atrix: SOIL	
Analyses		Result	PQL Q	ual Units	DF	Date Analyzed
EPA METHOD	8015B: DIESEL RANGE	ORGANICS				Analyst: SCC
Diesel Range (Drganics (DRO)	ND	10	mg/Kg	1	2/21/2007 10:16:46 PM
Surr: DNOP		70.0	61.7-135	%REC	1	2/21/2007 10:16:46 PM
EPA METHOD	8015B: GASOLINE RA	NGE				Analyst: NSB
Gasoline Rang	e Organics (GRO)	ND	5.0	mg/Kg	1	2/22/2007 1:32:12 AM

84-138

0.10

0.050

0.050

0.050

0.10

68.2-109

108

ND

ND

ND

ND

ND

90.8

%REC

mg/Kg

mg/Kg

mg/Kg

mg/Kg

mg/Kg

%REC

Hall Environmental Analysis Laboratory, Inc.

Date: 22-Feb-07

1

1

1

1

1

1

1

PASSED

2/22/2007 1:32:12 AM

Analyst: NSB

Qualifiers:

Surr: BFB

Benzene

Toluene

Ethylbenzene

Xylenes, Total

EPA METHOD 8021B: VOLATILES

Methyl tert-butyl ether (MTBE)

Surr: 4-Bromofluorobenzene

Value exceeds Maximum Contaminant Level
E Value above quantitation range

- E Value above quantitation rangeJ Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limit: 10 / 14
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

CLIENT: In	ndustrial Ecosystems	, Inc.		Clien	it Sample ID:	Basin #559	
Lab Order: 0	810611			Co	llection Date:	10/29/2008	1:20:00 PM
Project: J	FJ Land Farm			D	ate Received:	10/30/2008	
Lab ID: 0	810611-16				Matrix:	SOIL	
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015	B: DIESEL RANGE	ORGANICS					Analyst: SCC
Diesel Range Organi	ics (DRO)	ND	10		mg/Kg	1	11/3/2008
Surr: DNOP		101	61.7-135		%REC	1	11/3/2008
EPA METHOD 8015	B: GASOLINE RAN	GE					Analyst: DAM
Gasoline Range Org	anics (GRO)	ND	5.0		mg/Kg	1	11/1/2008 8:01:51 PM
Surr: BFB		95.2	58.8-123		%REC	1	11/1/2008 8:01:51 PM
EPA METHOD 8021	B: VOLATILES						Analyst: DAM
Benzene		ND	0.050		mg/Kg	1	11/4/2008 12:12:40 PM
Toluene		ND	0.050		mg/Kg	1	11/4/2008 12:12:40 PM
Ethylbenzene		ND	0.050		mg/Kg	1	11/4/2008 12:12:40 PM
X <mark>ylenes, To</mark> tal		ND	0.15		mg/Kg	1	11/4/2008 12:12:40 PM
Surr: 4-Bromofluor	robenzene	117	66.8-139		%REC	1	11/4/2008 12:12:40 PM

PASSED

*

Qualifiers:

- Value exceeds Maximum Contaminant Level Е Estimated value
- Analyte detected below quantitation limits J
- ND Not Detected at the Reporting Limit
- Spike recovery outside accepted recovery limits S
- В Analyte detected in the associated Method Blank

Date: 11-Nov-08

- Η Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Page 16 of 24

16

CLIENT:	Industrial Ecosysten	ns, Inc.		Clien	t Sample ID:	Basin #55	9
Lab Order:	0809036				llection Date:		
Project:	JFJ Land Farm			D	ate Received:	9/3/2008	
Lab ID:	0809036-11				Matrix:	SOIL	
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD	8015B: DIESEL RANG	E ORGANICS					Analyst: SCC
Diesel Range O	rganics (DRO)	340	100		mg/Kg	10	9/6/2008
Surr: DNOP		0	61.7-135	S	%REC	10	9/6/2008
EPA METHOD	8015B: GASOLINE RA	NGE					Analyst: DAN
	Organics (GRO)	ND	5.0		mg/Kg	1	9/13/2008 4:23:29 AM
Gasoline Range							
Gasoline Range Surr: BFB	(,	78.6	58.8-123		%REC	1	9/13/2008 4:23:29 AM
•		78.6	58.8-123		%REC	1	9/13/2008 4:23:29 AM Analyst: SLB

Date: 17-Sep-08

Qualifiers:

Value exceeds Maximum Contaminant Level
E Value above quantitation range

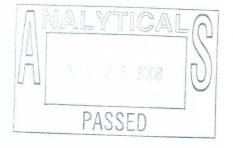
- E Value above quantitation rangeJ Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Snike recovery outside accented recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded

MCL Maximum Contaminant Level

RL Reporting Limit

CLIENT:	Industrial Ecosystems	s, Inc.		Clier	t Sample I	D: Burlington	Burlington #571		
Lab Order:	0811466			Co	llection Dat	te: 11/24/2008	3 11:16:00 AM		
Project:	JFJ Land Farm			D	ate Receive	d: 11/26/2008	3		
Lab ID:	0811466-10				Matri	ix: SOIL			
Analyses	in and in the second	Result	PQL	Qual	Units	DF	Date Analyzed		
EPA METHOD	300.0: ANIONS		and the second secon			a day kaominina mpika kaominina dia mpika mpi	Analyst: RAGS		
Chloride		330	3.0		mg/Kg	10	12/12/2008 1:21:29 AM		

Date: 12-Dec-08



*

Qualifiers:

E Estimated value

- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

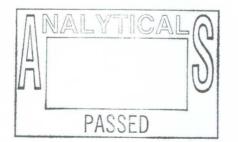
Value exceeds Maximum Contaminant Level

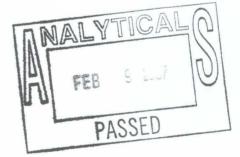
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Page 10 of 25

CLIENT: Industrial Ecosystems, 1	lnc.		С	lient Sample ID:	Burlin	Burlington 571		
Lab Order: 0701333				Collection Date:	1/25/2	2007 1:20:00 PM		
Project: JFJ Land Farm				Date Received:	1/29/2	2007		
Lab ID: 0701333-05				Matrix:	SOIL			
Analyses	Result	PQL	Qual	Units	DF	Date Analyzed		
EPA METHOD 8015B: DIESEL RANGE C	RGANICS					Analyst: SCC		
Diesel Range Organics (DRO)	33	10		mg/Kg	1	2/6/2007 11:58:36 PM		
Surr: DNOP	102	61.7-135		%REC	1	2/6/2007 11:58:36 PM		
EPA METHOD 8015B: GASOLINE RANG	E					Analyst: LMM		
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	1/30/2007 3:30:22 PM		
Surr: BFB	107	84-138		%REC	1	1/30/2007 3:30:22 PM		
EPA METHOD 8021B: VOLATILES						Analyst: LMM		
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	1/30/2007 3:30:22 PM		
Benzene	ND	0.050		mg/Kg	1	1/30/2007 3:30:22 PM		
Toluene	ND	0.050		mg/Kg	1	1/30/2007 3:30:22 PM		
Ethylbenzene	ND	0.050		mg/Kg	1	1/30/2007 3:30:22 PM		
Xylenes, Total	ND	0.15		mg/Kg	1	1/30/2007 3:30:22 PM		
Surr: 4-Bromofluorobenzene	87.9	68.2-109		%REC	1	1/30/2007 3:30:22 PM		

Date: 09-Feb-07





Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level RL Reporting Limit
- i i copo

CLIENT: Lab Order: Project: Lab ID:	Industrial Ecosystems, 0811466 JFJ Land Farm 0811466-11	Inc.		Col	t Sample ID: llection Date: ate Received: Matrix:	11/24/200 11/26/200	8 11:36:00 AM
Analyses	-	Result	PQL	Qual	Units	DF	Date Analyzed
-	300.0: ANIONS	62	0.30		mg/Kg	1	Analyst: RAGS 12/10/2008 6:25:59 PM
						5	
MALY	TICALO						
	2 8 2068						

Qualifiers:

- Value exceeds Maximum Contaminant Level * Estimated value Е
- Analyte detected below quantitation limits J
- Not Detected at the Reporting Limit ND
- Spike recovery outside accepted recovery limits S
- Analyte detected in the associated Method Blank В
- Holding times for preparation or analysis exceeded Н

Page 11 of 25

- MCL Maximum Contaminant Level
- Reporting Limit RL

CLIENT:	Industrial Ecosystem	s, Inc.		0	Client Sample ID	: Burlin	ngton #612
Lab Order:	0712353				Collection Date	: 12/26	/2007 11:10:00 AM
Project:	JFJ Land Farm				Date Received	: 12/27	/2007
Lab ID:	0712353-08				Matrix	: SOIL	
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD	8015B: DIESEL RANGE	ORGANICS					Analyst: SCC
Diesel Range C	Organics (DRO)	22	10		mg/Kg	1	1/2/2008 11:12:08 AM
Surr: DNOP		94.2	61.7-135		%REC	1	1/2/2008 11:12:08 AM
EPA METHOD	8015B: GASOLINE RAI	NGE					Analyst: NSB
Gasoline Range	e Organics (GRO)	ND	5.0		mg/Kg	1	12/28/2007 3:18:25 PM
Surr: BFB		109	84-138		%REC	1	12/28/2007 3:18:25 PM
EPA METHOD	8021B: VOLATILES						Analyst: NSB
Methyl tert-buty	d ether (MTBE)	ND	0.10		mg/Kg	1	12/28/2007 3:18:25 PM
Benzene		ND	0.050		mg/Kg	1	12/28/2007 3:18:25 PM
Toluene		ND	0.050		mg/Kg	, 1	12/28/2007 3:18:25 PM
Ethylbenzene		ND	0.050		mg/Kg	1	12/28/2007 3:18:25 PM
Xylenes, Total		ND	0.10		mg/Kg	1	12/28/2007 3:18:25 PM
Surr: 4-Brom	ofluorobenzene	98.7	81.4-117		%REC	1	12/28/2007 3:18:25 PM

MALYTICAL JAN - 3 2008 PASSED

Date: 03-Jan-08

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

CLIENT: Lab Order: Project: Lab ID:	Industrial Ecosystems, In 0811466 JFJ Land Farm 0811466-12	ıc.	(Date Receive	e: 11/24/200	08 11:56:00 AM
Analyses	No. Lo. S. S.	Result	PQL Qu	al Units	DF	Date Analyzed
EPA METHOD 3 Chloride	00.0: ANIONS	34	0.30	mg/Kg	1	Analyst: RAGS 12/10/2008 6:43:24 PM
					8	
NALYT						
PASS	ED					

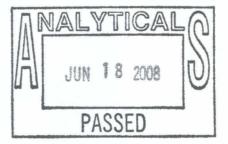
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

Page 12 of 25

RL Reporting Limit

CLIENT:	Industrial Ecosystems,	Inc.		Client	Sample ID:	Burlington	#625
Lab Order:	0806270			Coll	ection Date:	6/16/2008	10:20:00 AM
Project:	JFJ Land Farm			Da	te Received:	6/18/2008	
Lab ID:	0806270-04				Matrix:	SOIL	
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD	8015B: DIESEL RANGE	ORGANICS		dana da antida de estas da			Analyst: SCC
Diesel Range O	rganics (DRO)	ND	10	1	mg/Kg	1	6/20/2008 6:31:51 AM
Surr: DNOP		71.6	61.7-135		%REC	1	6/20/2008 6:31:51 AM
EPA METHOD	8015B: GASOLINE RANG	GE					Analyst: NSB
Gasoline Range	Organics (GRO)	ND	5.0	1	mg/Kg	1	6/24/2008 3:45:10 PM
Surr: BFB		93.0	84-138		%REC	1	6/24/2008 3:45:10 PM
EPA METHOD	8021B: VOLATILES						Analyst: NSB
Methyl tert-buty	ether (MTBE)	ND	0.10	1	mg/Kg	1	6/24/2008 3:45:10 PM
Benzene		ND	0.050	1	mg/Kg	1	6/24/2008 3:45:10 PM
Toluene		ND	0.050	1	mg/Kg	1	6/24/2008 3:45:10 PM
Ethylbenzene		ND	0.050	1	mg/Kg	1	6/24/2008 3:45:10 PM
Xyl <mark>enes, T</mark> otal		ND	0.10	1	ng/Kg	1	6/24/2008 3:45:10 PM
Surr: 4-Brom	ofluorobenzene	91.2	81.4-117		%REC	1	6/24/2008 3:45:10 PM
EPA METHOD	9056A: ANIONS						Analyst: SLB
Chloride		130	1.5		mg/Kg	5	6/25/2008 9:30:17 PM

Date: 30-Jun-08

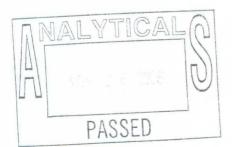


Qualifiers:

*

- Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

CLIENT:	Industrial Ecosystems	, Inc.		Clier	nt Sample ID <mark>:</mark>	Community	y #655
Lab Order:	0811466			Co	llection Date:	11/24/2008	3:40:00 PM
Project:	JFJ Land Farm			D	ate Received:	11/26/2008	3
Lab ID:	0811466-24				Matrix:	SOIL	
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD	8015B: DIESEL RANGE	ORGANICS			and an indiana and an		Analyst: SCC
Diesel Range O	rganics (DRO)	ND	10		mg/Kg	1	12/2/2008
Surr: DNOP		86.5	61.7-135		%REC	1	12/2/2008
EPA METHOD	8015B: GASOLINE RAN	GE					Analyst: DAM
Gasoline Range	e Organics (GRO)	ND	5.0		mg/Kg	1	12/4/2008 1:47:31 AM
Surr: BFB		89.8	58.8-123		%REC	1	12/4/2008 1:47:31 AM
EPA METHOD	8021B: VOLATILES						Analyst: DAM
Benzene		ND	0.050		mg/Kg	1	12/4/2008 1:47:31 AM
Toluene		ND	0.050		mg/Kg	1	12/4/2008 1:47:31 AM
Ethylbenzene		ND	0.050		mg/Kg	1	12/4/2008 1:47:31 AM
Xylenes, Total		ND	0.10		mg/Kg	1	12/4/2008 1:47:31 AM
Surr: 4-Brom	ofluorobenzene	100	66.8-139		%REC	1	12/4/2008 1:47:31 AM
EPA METHOD	300.0: ANIONS						Analyst: RAGS
Chloride		22	3.0		mg/Kg	10	12/12/2008 3:58:09 AM



Qualifiers:

- * Value exceeds Maximum Contaminant Level E Estimated value
- J
- Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- Spike recovery outside accepted recovery limits S
- В Analyte detected in the associated Method Blank
- Holding times for preparation or analysis exceeded Н
- MCL Maximum Contaminant Level
- RL Reporting Limit

Page 24 of 25

24

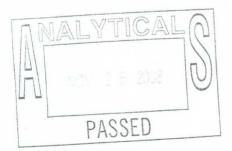
Hall Environmental Analysis Laboratory, Inc.

Date: 12-Dec-08

Date: 12-Dec-08

CLIENT:	Industrial Ecosystems	s, Inc.		Clien	t Sample ID:	Graves #	105-В	
Lab Order:	0811466			Col	llection Date:	11/24/200	08 3:50:00 PM	
Project: JFJ Land Farm				Date Received:		11/26/200	08	
Lab ID:	0811466-25			Matrix:		SOIL		
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed	
EPA METHOD	8015B: DIESEL RANGE	ORGANICS	adar dagi pinci ngener many nakladini orba dagen	A SALAT PLANA			Analyst: SCC	
Diesel Range C	Organics (DRO)	ND	10		mg/Kg	1	12/2/2008	
Surr: DNOP		85.6	61.7-135		%REC	1	12/2/2008	
EPA METHOD	8015B: GASOLINE RAN	IGE					Analyst: DAM	Λ

LFA METHOD OUTSD. GASOLINE RANGE					Analyst. DAW
Gasoline Range Organics (GRO)	ND	5.0	mg/Kg	1	12/4/2008 2:17:46 AM
Surr: BFB	89.8	58.8-123	%REC	1	12/4/2008 2:17:46 AM



Qualifiers:

* Value exceeds Maximum Contaminant Level
E Estimated value

- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

		LYTI		LQ	Data	05-Aug-	0.8
Hall Environmental Analys	IS Zabora	jery, gn	2008	U	Date.	0J-Aug-	00
CLIENT: Industrial Ecosystems. Project: JFJ Land Farm	, Inc	PASSE	D		La	b Order:	0807324
Lab ID: 0807324-01			(Collectio	n Date:	7/22/200	8 1:45:00 PM
Client Sample ID:				I	Matrix:	SOIL	
Analyses	Result	PQL	Qual	Units		DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	210	3.0		mg/Kg		10	Analyst: SLB 7/30/2008 10:39:05 PM
Lab ID: 0807324-02			(Collectio	n Date:	7/22/200	8 2:05:00 PM
Client Sample ID:				1	Matrix:	SOIL	
Analyses	Result	PQL	Qual	Units		DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	710	3.0	÷	mg/Kg		10	Analyst: SLB 7/30/2008 10:56:30 PM
Lab ID: 0807324-03				Collectio	n Date:	7/22/200	8 2:20:00 PM
Client Sample ID:					Matrix:		
Analyses	Result	PQL	Qual	Units		DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	600	3.0		mg/Kg		10	Analyst: SLB 7/30/2008 11:13:54 PM
Lab ID: 0807324-04			(Collectio	n Date:	7/22/200	8 2:45:00 PM
Client Sample ID:]	Matrix:	SOIL	
Analyses	Result	PQL	Qual	Units		DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	590	3.0		mg/Kg		10	Analyst: SLB 7/30/2008 11:31:18 PM
Lab ID: 0807324-05				Collectio	n Date:	7/22/200	8 2:53:00 PM
Client Sample ID:					Matrix:		
Analyses	Result	PQL	Qual	Units		DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	150	3.0		mg/Kg		10	Analyst: SLB 7/30/2008 11:48:43 PM
Lab ID: 0807324-06				Collectio	n Date:	7/22/200	8
Client Sample ID: Graves #105B					Matrix:		
Analyses	Result	PQL	Qual	Units		DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	340	3.0		mg/Kg		10	Analyst: SLB 7/31/2008 12:06:07 AM
Qualifiers: * Value exceeds Maximum E Value above quantitation J Analyte detected below quantitation ND Not Detected at the Report S Solve exceeds the report	range uantitation limits	in a second s		H Hold ACL Maxi	ing times f	or preparation aminant Lev	ciated Method Blank on or analysis exceeded vel

Client Sample ID: Graves 105-B **CLIENT:** Industrial Ecosystems, Inc. Lab Order: 0701333 Collection Date: 1/25/2007 11:42:00 AM **Project:** JFJ Land Farm Date Received: 1/29/2007 Matrix: SOIL Lab ID: 0701333-14 DF Result PQL Qual Units Analyses **Date Analyzed EPA METHOD 8015B: DIESEL RANGE ORGANICS** Analyst: SCC Diesel Range Organics (DRO) 240 1 2/7/2007 6:09:49 AM 10 mg/Kg Surr: DNOP 106 61.7-135 %REC 1 2/7/2007 6:09:49 AM **EPA METHOD 8015B: GASOLINE RANGE** Analyst: LMM Gasoline Range Organics (GRO) ND 5.0 mg/Kg 1 1/30/2007 9:01:10 PM Surr: BFB 241 84-138 S %REC 1 1/30/2007 9:01:10 PM **EPA METHOD 8021B: VOLATILES** Analyst: LMM Methyl tert-butyl ether (MTBE) ND 0.10 mg/Kg 1/30/2007 9:01:10 PM 1 Benzene ND 0.050 mg/Kg 1 1/30/2007 9:01:10 PM ND 0.050 Toluene mg/Kg -1 1/30/2007 9:01:10 PM Ethylbenzene ND 0.050 mg/Kg 1 1/30/2007 9:01:10 PM Xylenes, Total ND 0.15 mg/Kg 1 1/30/2007 9:01:10 PM Surr: 4-Bromofluorobenzene 126 68.2-109 S %REC 1 1/30/2007 9:01:10 PM

Hall Environmental Analysis Laboratory, Inc.

Date: 09-Feb-07

Qualifiers:

* Value exceeds Maximum Contaminant Level

E Value above quantitation range

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

- S Spike recovery outside accepted recovery limits 15/29
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit