

NM1 - 10B

**APPROVALS**

*Disposition*

**YEAR(S):**

*2009*

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## Hansen, Edward J., EMNRD

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Friday, March 06, 2009 1:27 PM  
**To:** '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



Industrial Ecosystems Inc.  
Soil Reclamation Center

P.O. Box 2043  
Farmington, NM 87499

Phone: (505) 632-1782  
Fax: (505) 632-1876

RECEIVED  
#49 CR 3150  
2009 FEB 12 6 11 37  
Aztec, NM 87410

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"***.

**Transitional Provision (19.15.36.20) NMAC** 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,

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

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***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 **Landfarm & Composting Operation, # 17**. – “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 **Landfarm & Composting Operation, # 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.



**Industrial Ecosystems Inc.  
Soil Reclamation Center**

P.O. Box 2043  
Farmington, NM 87499

Phone: (505) 632-1782  
Fax: (505) 632-1876

RECEIVED  
2009 FEB 13 11 37  
#49 CR 31501  
Aztec, NM 87410

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,

Marcella Marquez  
Administrative Officer

Attachment(s)

**Hall Environmental Analysis Laboratory, Inc.**

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Elmridge #4

Lab Order: 0811466

Collection Date: 11/24/2008 8:31:00 AM

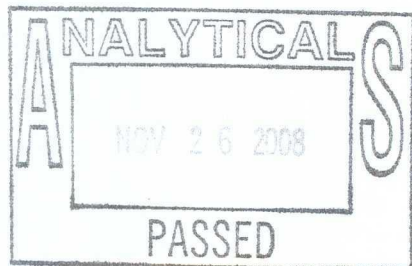
Project: JFJ Land Farm

Date Received: 11/26/2008

Lab ID: 0811466-01

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: RAGS
Chloride	260	3.0		mg/Kg	10	12/11/2008 10:44:46 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

Page 1 of 25

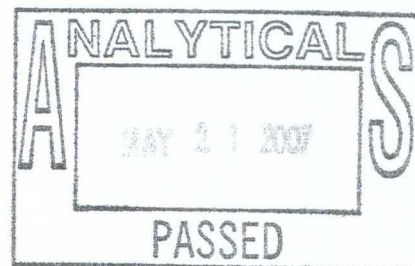
# Hall Environmental Analysis Laboratory, Inc.

Date: 21-May-07

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0705249  
Project: JFJ Land Farm  
Lab ID: 0705249-02

Client Sample ID: Elmridge #4  
Collection Date: 5/15/2007 10:06:00 AM  
Date Received: 5/17/2007  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						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
<b>EPA METHOD 8021B: VOLATILES</b>						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



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

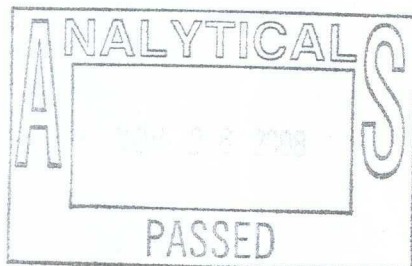
# Hall Environmental Analysis Laboratory, Inc.

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0811466  
Project: JFJ Land Farm  
Lab ID: 0811466-02

Client Sample ID: Basin #12  
Collection Date: 11/24/2008 8:50:00 AM  
Date Received: 11/26/2008  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: RAGS
Chloride	64	0.30		mg/Kg	1	12/10/2008 2:57:04 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



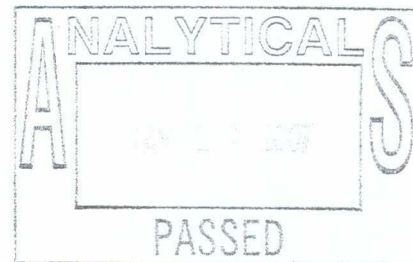
# Hall Environmental Analysis Laboratory, Inc.

Date: 21-May-07

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0705249  
Project: JFJ Land Farm  
Lab ID: 0705249-05

Client Sample ID: Basin #12  
Collection Date: 5/15/2007 10:40:00 AM  
Date Received: 5/17/2007  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: NSB
Gasoline Range 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
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: NSB
Methyl tert-butyl 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-Bromofluorobenzene	87.0	68.2-109		%REC	1	5/18/2007 7:10:34 PM



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

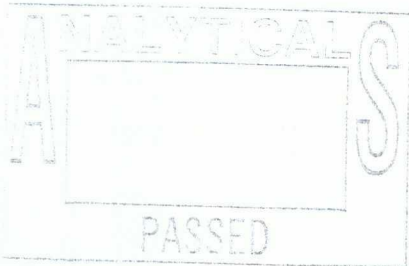
## Hall Environmental Analysis Laboratory, Inc.

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0811466  
Project: JFJ Land Farm  
Lab ID: 0811466-13

Client Sample ID: Conco #26  
Collection Date: 11/24/2008 12:30:00 PM  
Date Received: 11/26/2008  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						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
<b>EPA METHOD 8021B: VOLATILES</b>						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	66.8-139		%REC	1	12/3/2008 1:37:54 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

**Hall Environmental Analysis Laboratory, Inc.**

Date: 01-Oct-08

**CLIENT:** Industrial Ecosystems, Inc.  
**Lab Order:** 0809404  
**Project:** JFJ Land Farm  
**Lab ID:** 0809404-24

**Client Sample ID:** Conco #26  
**Collection Date:** 9/16/2008 11:35:00 AM  
**Date Received:** 9/19/2008  
**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (DRO)	310	100		mg/Kg	10	9/23/2008
Surr: DNOP	0	61.7-135	S	%REC	10	9/23/2008
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: DAM
Gasoline Range 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
<b>EPA METHOD 300.0: ANIONS</b>						Analyst: SLB
Chloride	170	3.0		mg/Kg	10	9/29/2008 3:12:56 PM

**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

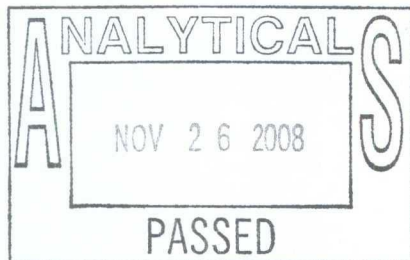
**Hall Environmental Analysis Laboratory, Inc.**

Date: 12-Dec-08

**CLIENT:** Industrial Ecosystems, Inc.  
**Lab Order:** 0811466  
**Project:** JFJ Land Farm  
**Lab ID:** 0811466-03

**Client Sample ID:** Williams #48  
**Collection Date:** 11/24/2008 9:15:00 AM  
**Date Received:** 11/26/2008  
**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: RAGS
Chloride	93	0.30		mg/Kg	1	12/10/2008 3:14:28 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



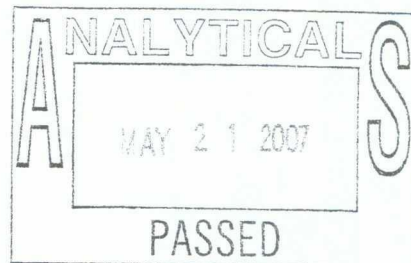
**Hall Environmental Analysis Laboratory, Inc.**

Date: 21-May-07

**CLIENT:** Industrial Ecosystems, Inc.  
**Lab Order:** 0705249  
**Project:** JFJ Land Farm  
**Lab ID:** 0705249-08

**Client Sample ID:** Williams #48  
**Collection Date:** 5/15/2007 11:32:00 AM  
**Date Received:** 5/17/2007  
**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: NSB
Gasoline Range 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
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: NSB
Methyl tert-butyl 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-Bromofluorobenzene	85.9	68.2-109		%REC	1	5/18/2007 9:40:38 PM



**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

# Hall Environmental Analysis Laboratory, Inc.

Date: 11-Nov-08

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Basin #54

Lab Order: 0810611

Collection Date: 10/29/2008 9:30:00 AM

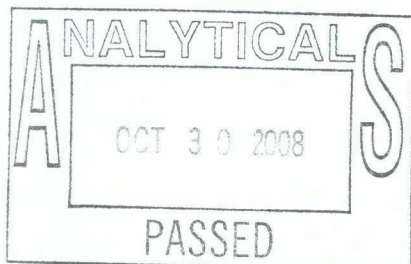
Project: JFJ Land Farm

Date Received: 10/30/2008

Lab ID: 0810611-05

Matrix: SOIL

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



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

## Hall Environmental Analysis Laboratory, Inc.

Date: 30-Apr-07

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Basin #54

Lab Order: 0704405

Collection Date: 4/25/2007 10:10:00 AM

Project: JFJ Land Farm

Date Received: 4/26/2007

Lab ID: 0704405-09

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (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 8015B: GASOLINE RANGE						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 8021B: 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
Xylenes, Total	ND	0.10		mg/Kg	1	4/27/2007 4:03:39 PM
Surr: 4-Bromofluorobenzene	90.0	68.2-109		%REC	1	4/27/2007 4:03:39 PM

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

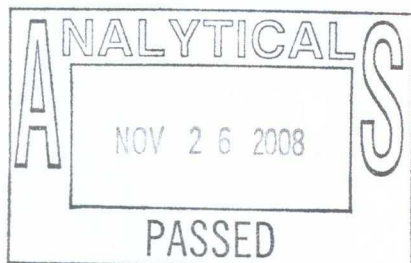
# Hall Environmental Analysis Laboratory, Inc.

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0811466  
Project: JFJ Land Farm  
Lab ID: 0811466-04

Client Sample ID: Red Willow #60  
Collection Date: 11/24/2008 9:30:00 AM  
Date Received: 11/26/2008  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: RAGS
Chloride	140	3.0		mg/Kg	10	12/11/2008 11:02:10 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



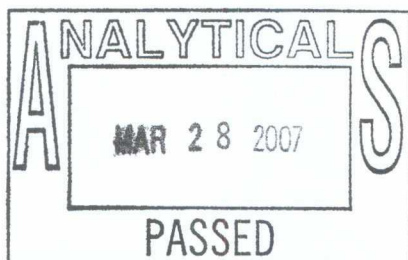
# Hall Environmental Analysis Laboratory, Inc.

Date: 28-Mar-07

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0703336  
Project: JFJ Land Farm  
Lab ID: 0703336-05

Client Sample ID: Red willow 60  
Collection Date: 3/21/2007 10:20:00 AM  
Date Received: 3/22/2007  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						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
<b>EPA METHOD 8021B: VOLATILES</b>						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-Bromofluorobenzene	91.4	68.2-109		%REC	1	3/26/2007 1:44:15 PM



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

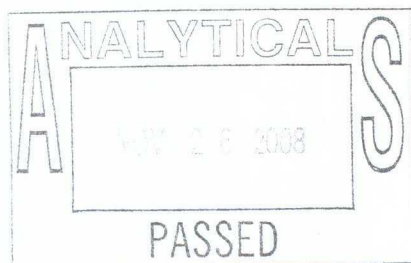
## Hall Environmental Analysis Laboratory, Inc.

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.  
 Lab Order: 0811466  
 Project: JFJ Land Farm  
 Lab ID: 0811466-16

Client Sample ID: Basin #67  
 Collection Date: 11/24/2008 1:25:00 PM  
 Date Received: 11/26/2008  
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	12/2/2008
Surr: DNOP	85.6	61.7-135		%REC	1	12/2/2008
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: DAM
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	12/3/2008 3:09:24 PM
Surr: BFB	92.9	58.8-123		%REC	1	12/3/2008 3:09:24 PM
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: DAM
Benzene	ND	0.050		mg/Kg	1	12/3/2008 3:09:24 PM
Toluene	ND	0.050		mg/Kg	1	12/3/2008 3:09:24 PM
Ethylbenzene	ND	0.050		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	1	12/3/2008 3:09:24 PM
<b>EPA METHOD 300.0: ANIONS</b>						Analyst: RAGS
Chloride	16	0.30		mg/Kg	1	12/10/2008 7:18:13 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

**Hall Environmental Analysis Laboratory, Inc.**

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Basin #212

Lab Order: 0811466

Collection Date: 11/24/2008 9:45:00 AM

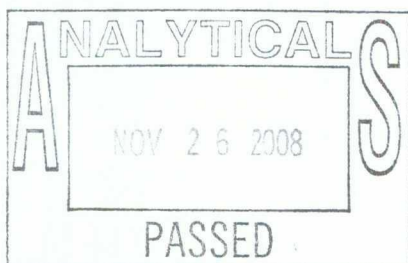
Project: JFJ Land Farm

Date Received: 11/26/2008

Lab ID: 0811466-05

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: RAGS
Chloride	430	3.0		mg/Kg	10	12/11/2008 11:54:25 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

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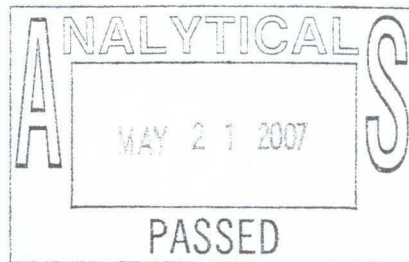
# Hall Environmental Analysis Laboratory, Inc.

Date: 21-May-07

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0705249  
Project: JFJ Land Farm  
Lab ID: 0705249-10

Client Sample ID: Basin #212  
Collection Date: 5/15/2007 12:00:00 PM  
Date Received: 5/17/2007  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range 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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: NSB
Gasoline Range 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
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: NSB
Methyl tert-butyl 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-Bromofluorobenzene	86.3	68.2-109		%REC	1	5/18/2007 10:40:51 PM



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



**Hall Environmental Analysis Laboratory, Inc.**

Date: 11-Nov-08

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Burlington #516

Lab Order: 0810611

Collection Date: 10/29/2008 10:15:00 AM

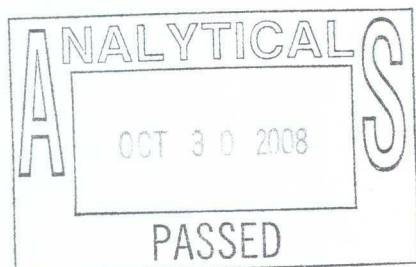
Project: JFJ Land Farm

Date Received: 10/30/2008

Lab ID: 0810611-08

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
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

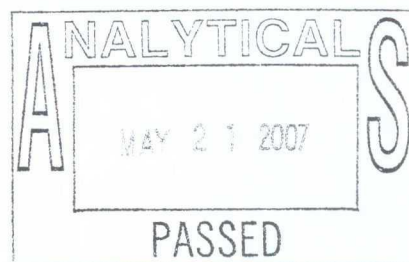
# Hall Environmental Analysis Laboratory, Inc.

Date: 21-May-07

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0705249  
Project: JFJ Land Farm  
Lab ID: 0705249-14

Client Sample ID: Burlington #516  
Collection Date: 5/15/2007 1:00:00 PM  
Date Received: 5/17/2007  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	5/19/2007 12:40:46 AM
Surr: BFB	111	84-138		%REC	1	5/19/2007 12:40:46 AM
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	5/19/2007 12:40:46 AM
Benzene	ND	0.050		mg/Kg	1	5/19/2007 12:40:46 AM
Toluene	ND	0.050		mg/Kg	1	5/19/2007 12:40:46 AM
Ethylbenzene	ND	0.050		mg/Kg	1	5/19/2007 12:40:46 AM
Xylenes, Total	ND	0.10		mg/Kg	1	5/19/2007 12:40:46 AM
Surr: 4-Bromofluorobenzene	86.5	68.2-109		%REC	1	5/19/2007 12:40:46 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
- 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

**Hall Environmental Analysis Laboratory, Inc.**

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Burlington #518

Lab Order: 0811466

Collection Date: 11/24/2008 10:42:00 AM

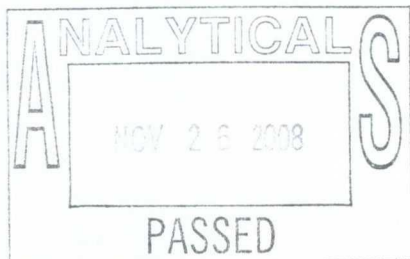
Project: JFJ Land Farm

Date Received: 11/26/2008

Lab ID: 0811466-08

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: RAGS
Chloride	220	3.0		mg/Kg	10	12/12/2008 12:46:39 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

## Hall Environmental Analysis Laboratory, Inc.

Date: 22-Feb-07

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Burlington 518

Lab Order: 0702228

Collection Date: 2/20/2007 9:15:00 AM

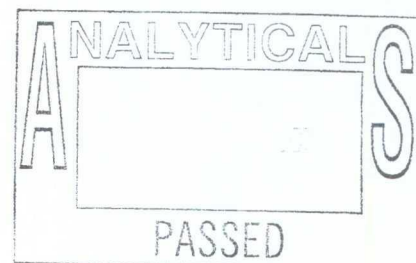
Project: JFJ Land Farm

Date Received: 2/21/2007

Lab ID: 0702228-08

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						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
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: NSB
Methyl tert-butyl 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-Bromofluorobenzene	90.1	68.2-109		%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

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



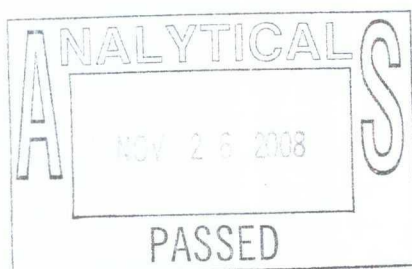
# Hall Environmental Analysis Laboratory, Inc.

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0811466  
Project: JFJ Land Farm  
Lab ID: 0811466-09

Client Sample ID: Dugans #557  
Collection Date: 11/24/2008 11:02:00 AM  
Date Received: 11/26/2008  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	600	3.0		mg/Kg	10	Analyst: RAGS 12/12/2008 1:04:04 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

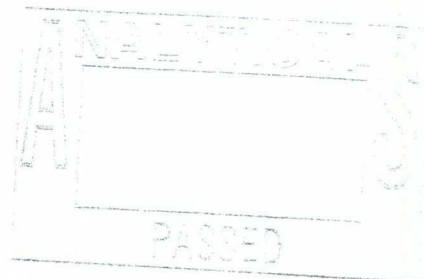
# Hall Environmental Analysis Laboratory, Inc.

Date: 22-Feb-07

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0702228  
Project: JFJ Land Farm  
Lab ID: 0702228-10

Client Sample ID: Dugan 557  
Collection Date: 2/20/2007 9:48:00 AM  
Date Received: 2/21/2007  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	2/22/2007 1:32:12 AM
Surr: BFB	108	84-138		%REC	1	2/22/2007 1:32:12 AM
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	2/22/2007 1:32:12 AM
Benzene	ND	0.050		mg/Kg	1	2/22/2007 1:32:12 AM
Toluene	ND	0.050		mg/Kg	1	2/22/2007 1:32:12 AM
Ethylbenzene	ND	0.050		mg/Kg	1	2/22/2007 1:32:12 AM
Xylenes, Total	ND	0.10		mg/Kg	1	2/22/2007 1:32:12 AM
Surr: 4-Bromofluorobenzene	90.8	68.2-109		%REC	1	2/22/2007 1:32:12 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  
S Spike recovery outside accepted recovery limit:

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

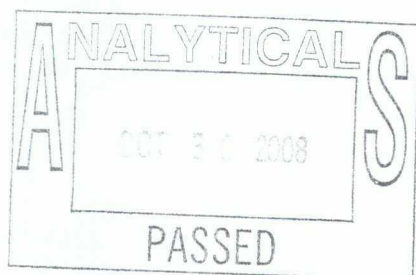
# Hall Environmental Analysis Laboratory, Inc.

Date: 11-Nov-08

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0810611  
Project: JFJ Land Farm  
Lab ID: 0810611-16

Client Sample ID: Basin #559  
Collection Date: 10/29/2008 1:20:00 PM  
Date Received: 10/30/2008  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	11/3/2008
Surr: DNOP	101	61.7-135		%REC	1	11/3/2008
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: DAM
Gasoline Range Organics (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
<b>EPA METHOD 8021B: VOLATILES</b>						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
Xylenes, Total	ND	0.15		mg/Kg	1	11/4/2008 12:12:40 PM
Surr: 4-Bromofluorobenzene	117	66.8-139		%REC	1	11/4/2008 12:12:40 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

**Hall Environmental Analysis Laboratory, Inc.**

Date: 17-Sep-08

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0809036  
Project: JFJ Land Farm  
Lab ID: 0809036-11

Client Sample ID: Basin #559  
Collection Date: 9/2/2008 11:35:00 AM  
Date Received: 9/3/2008  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (DRO)	340	100		mg/Kg	10	9/6/2008
Surr: DNOP	0	61.7-135	S	%REC	10	9/6/2008
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: DAM
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	9/13/2008 4:23:29 AM
Surr: BFB	78.6	58.8-123		%REC	1	9/13/2008 4:23:29 AM
<b>EPA METHOD 300.0: ANIONS</b>						Analyst: SLB
Chloride	170	3.0		mg/Kg	10	9/11/2008 10:39:31 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  
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

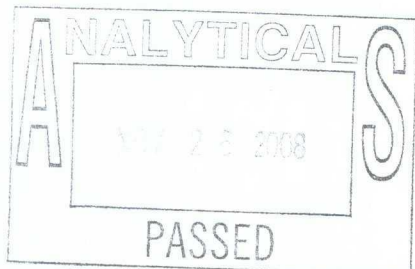
**Hall Environmental Analysis Laboratory, Inc.**

Date: 12-Dec-08

**CLIENT:** Industrial Ecosystems, Inc.  
**Lab Order:** 0811466  
**Project:** JFJ Land Farm  
**Lab ID:** 0811466-10

**Client Sample ID:** Burlington #571  
**Collection Date:** 11/24/2008 11:16:00 AM  
**Date Received:** 11/26/2008  
**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 300.0: ANIONS</b>						
Chloride	330	3.0		mg/Kg	10	Analyst: RAGS 12/12/2008 1:21:29 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

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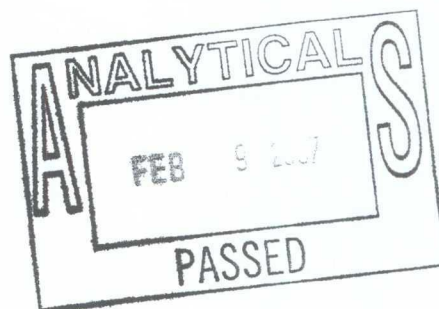
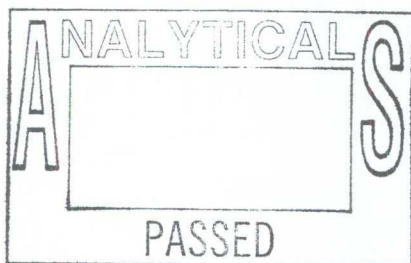
# Hall Environmental Analysis Laboratory, Inc.

Date: 09-Feb-07

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0701333  
Project: JFJ Land Farm  
Lab ID: 0701333-05

Client Sample ID: Burlington 571  
Collection Date: 1/25/2007 1:20:00 PM  
Date Received: 1/29/2007  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						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
<b>EPA METHOD 8021B: VOLATILES</b>						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



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

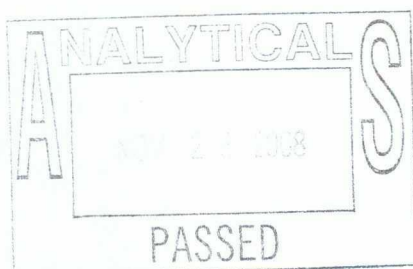
# Hall Environmental Analysis Laboratory, Inc.

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0811466  
Project: JFJ Land Farm  
Lab ID: 0811466-11

Client Sample ID: Burlington #612  
Collection Date: 11/24/2008 11:36:00 AM  
Date Received: 11/26/2008  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	62	0.30		mg/Kg	1	Analyst: RAGS 12/10/2008 6:25:59 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

**Hall Environmental Analysis Laboratory, Inc.**

Date: 03-Jan-08

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Burlington #612

Lab Order: 0712353

Collection Date: 12/26/2007 11:10:00 AM

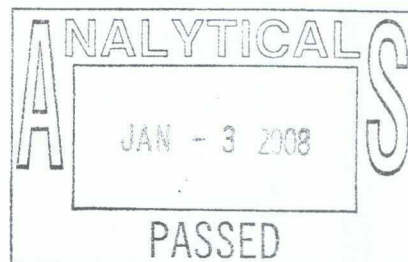
Project: JFJ Land Farm

Date Received: 12/27/2007

Lab ID: 0712353-08

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range 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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: NSB
Gasoline Range 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
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: NSB
Methyl tert-butyl 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-Bromofluorobenzene	98.7	81.4-117		%REC	1	12/28/2007 3:18:25 PM



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



**Hall Environmental Analysis Laboratory, Inc.**

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Burlington #625

Lab Order: 0811466

Collection Date: 11/24/2008 11:56:00 AM

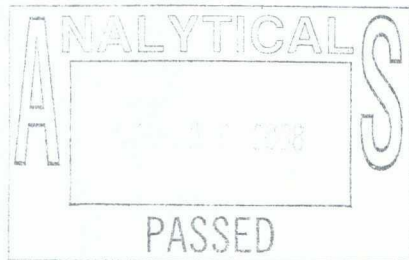
Project: JFJ Land Farm

Date Received: 11/26/2008

Lab ID: 0811466-12

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: RAGS
Chloride	34	0.30		mg/Kg	1	12/10/2008 6:43:24 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

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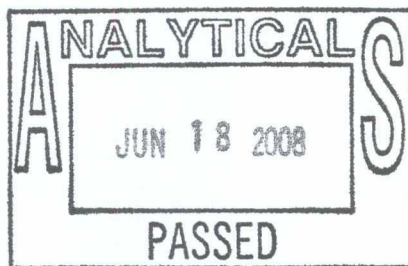
**Hall Environmental Analysis Laboratory, Inc.**

Date: 30-Jun-08

**CLIENT:** Industrial Ecosystems, Inc.  
**Lab Order:** 0806270  
**Project:** JFJ Land Farm  
**Lab ID:** 0806270-04

**Client Sample ID:** Burlington #625  
**Collection Date:** 6/16/2008 10:20:00 AM  
**Date Received:** 6/18/2008  
**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		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
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		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
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	6/24/2008 3:45:10 PM
Benzene	ND	0.050		mg/Kg	1	6/24/2008 3:45:10 PM
Toluene	ND	0.050		mg/Kg	1	6/24/2008 3:45:10 PM
Ethylbenzene	ND	0.050		mg/Kg	1	6/24/2008 3:45:10 PM
Xylenes, Total	ND	0.10		mg/Kg	1	6/24/2008 3:45:10 PM
Surr: 4-Bromofluorobenzene	91.2	81.4-117		%REC	1	6/24/2008 3:45:10 PM
<b>EPA METHOD 9056A: ANIONS</b>						Analyst: SLB
Chloride	130	1.5		mg/Kg	5	6/25/2008 9:30:17 PM



**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

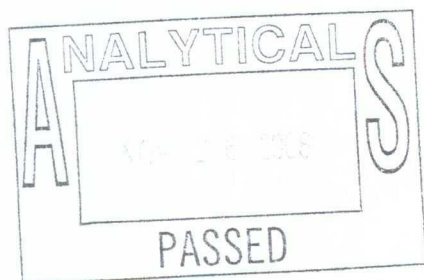
# Hall Environmental Analysis Laboratory, Inc.

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0811466  
Project: JFJ Land Farm  
Lab ID: 0811466-24

Client Sample ID: Community #655  
Collection Date: 11/24/2008 3:40:00 PM  
Date Received: 11/26/2008  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	12/2/2008
Surr: DNOP	86.5	61.7-135		%REC	1	12/2/2008
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: DAM
Gasoline Range 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
<b>EPA METHOD 8021B: VOLATILES</b>						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-Bromofluorobenzene	100	66.8-139		%REC	1	12/4/2008 1:47:31 AM
<b>EPA METHOD 300.0: ANIONS</b>						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
- 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

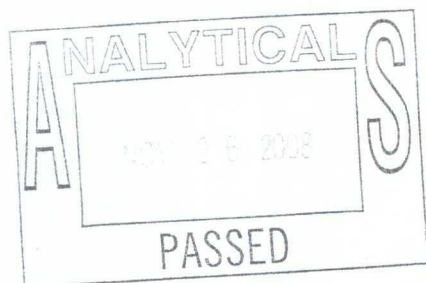
# Hall Environmental Analysis Laboratory, Inc.

Date: 12-Dec-08

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0811466  
Project: JFJ Land Farm  
Lab ID: 0811466-25

Client Sample ID: Graves #105-B  
Collection Date: 11/24/2008 3:50:00 PM  
Date Received: 11/26/2008  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range 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 RANGE						Analyst: DAM
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

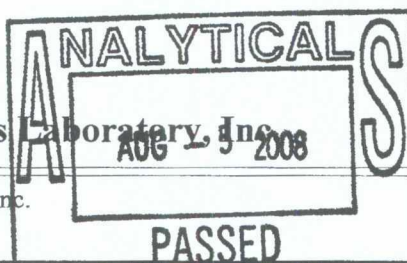


# Hall Environmental Analysis Laboratory, Inc.

Date: 05-Aug-08

CLIENT: Industrial Ecosystems, Inc.  
Project: JFJ Land Farm

Lab Order: 0807324



Lab ID: 0807324-01 Collection Date: 7/22/2008 1:45:00 PM  
Client Sample ID: [REDACTED] 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 Collection Date: 7/22/2008 2:05:00 PM  
Client Sample ID: [REDACTED] 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 Collection Date: 7/22/2008 2:20:00 PM  
Client Sample ID: [REDACTED] Matrix: SOIL

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 Collection Date: 7/22/2008 2:45:00 PM  
Client Sample ID: [REDACTED] 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 Collection Date: 7/22/2008 2:53:00 PM  
Client Sample ID: [REDACTED] Matrix: SOIL

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 Collection Date: 7/22/2008  
Client Sample ID: Graves #105B Matrix: SOIL

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 Contaminant Level  
E Value above quantitation range  
J Analyte detected below quantitation limits  
ND Not Detected at the Reporting Limit

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

# Hall Environmental Analysis Laboratory, Inc.

Date: 09-Feb-07

CLIENT: Industrial Ecosystems, Inc.  
Lab Order: 0701333  
Project: JFJ Land Farm  
Lab ID: 0701333-14

Client Sample ID: Graves 105-*B*  
Collection Date: 1/25/2007 11:42:00 AM  
Date Received: 1/29/2007  
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (DRO)	240	10		mg/Kg	1	2/7/2007 6:09:49 AM
Surr: DNOP	106	61.7-135		%REC	1	2/7/2007 6:09:49 AM
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						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
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: LMM
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	1/30/2007 9:01:10 PM
Benzene	ND	0.050		mg/Kg	1	1/30/2007 9:01:10 PM
Toluene	ND	0.050		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

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