

# **Chromium Data Report**

# DATE: 2007



4600 South Ulster Street, Suite 930 • Denver, Colorado 80237 • (303) 850-9200 • Fax (303) 850-9214

# GW-199, Hobbs

October 11, 2007

Mr. Wayne Price Environmental Bureau Chief New Mexico Oil Conservation Division 1220 South St Francis Drive Santa Fe, NM 87505

# Re: Chromium Data Compared with Modeling Results, Champion Technologies, Inc., Site (AP-14), 4001 South Highway 18, Hobbs, New Mexico

Dear Mr. Price:

As stated in our letter summarizing the chromium modeling results, dated January 29, 2007, for the Champion Technologies, Inc., site located at 4001 South Highway 18 in Hobbs, New Mexico, WSP Environmental Strategies LLC has prepared this comparison of semiannual sampling results to the model results. That model simulated offsite transport and attenuation of chromium as it relates to the entire saturated thickness of the Ogallala Aquifer. Based on the conditional approval of the July 12, 2006 site investigation report, the New Mexico Oil Conservation Division (NMOCD) concurred that chromium in groundwater is the one remaining environmental problem at the site. This letter recapitulates a description of the modeling effort and presents our interpretation of site data in relation to the model.

# **Model Simulation**

The purpose of the modeling was to estimate future behavior of chromium in groundwater using the site-specific data. The site data suggest that a finite release occurred, and that, on the there is not a continuing source of chromium to the groundwater. The primary attenuation mechanism in groundwater is likely dispersion and, to a lesser degree, sorption and diffusion.

The groundwater modeling software used for this analysis is AT123D, originally developed at Oak Ridge National Laboratory, Oak Ridge, Tennessee, by Gour-Tsyh Yeh, Ph.D. AT123D is based on an analytical solution for transient one-, two-, or three-dimensional transport of a dissolved chemical in a homogeneous aquifer with uniform, stationary regional flow. This model allows for an instantaneous, or continuous, release of organic or inorganic compounds to groundwater. It calculates the distribution of chemicals of concern (COCs) in groundwater over time taking into account dispersion, diffusion, sorption, and biodegradation, as warranted. The program predicts the concentration distribution in space and time in milligrams per liter (mg/l or ppm). The aquifer can be bounded (finite extent) or of infinite extent in the Y- and/or Z- direction; it is defined as an infinite extent in the positive X-direction. The X-direction is west to east, in the direction of groundwater flow; the Y-direction is north to south, perpendicular to groundwater flow; and the Z-direction is the vertical depth into the water table, in other words,

Mr. Wayne Price October 11, 2007 Page 2 of 5

the top of the water table is Z=0, and 30 meters below the water table is Z=30. The simulated source is centered at X=0, Y=0, and Z=0 to 3 meters.

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# **Model Inputs**

Based on information from previous site investigations, the subsurface geologic deposits at the site are characterized as a poorly–graded fine sand with trace silt. Perennial groundwater is encountered in the unconfined sand unit at a depth of approximately 17 meters below ground surface with a saturated thickness of at least 24 meters. A saturated thickness of 30 meters was defined for the modeling effort. Overall, the water level data from recent site investigations indicate a hydraulic gradient of 0.003 feet per foot to the east-southeast. There are no known groundwater recharge areas or sinks in the immediate area.

The release was modeled as a 50-year long, continuous release of chromium into groundwater. The results of historical soil investigations did not identify affected soils or a continuing source, suggesting that the source area currently has a low mass of chromium, within the range of background concentrations; however, in the past, the source area may have had elevated chromium concentrations that already migrated to the water table. The best-fit model input for the source was an area of approximately 10 meters by 10 meters, located at MW-13; this location and source dimensions yielded an output most closely fitting the historical groundwater data. The following table presents the primary model input values and the rationale or source of the values.

Parameter	Value	Comment
Aquifer depth	30 m (98 ft)	Based on review of NMOSE well
		records
Source dimensions	10 m x 10 m	Inferred from site data
Hydraulic conductivity	$1 \text{ m/hr} (2.8 \times 10^{-2} \text{ cm/s})$	Consistent with grain-size observed
		and TWDB literature
Hydraulic gradient	0.003	Based on site data 2003 to 2006
Longitudinal dispersivity, $\alpha_x$	10 m	Based on length of plume observed
Lateral dispersivity, $\alpha_{y}$	1 m	0.1 α <sub>x</sub>
Vertical dispersivity, $\alpha_z$	0.5 m	0.05 α <sub>x</sub>
Partitioning/Distribution coefficient,	$0.001 \text{ m}^3/\text{kg} (1 \text{ ml/g})$	EPA literature value
K <sub>d</sub>		
Molecular diffusion	$1 \times 10^{-5} \text{ m}^2/\text{hr} (2.8 \times 10^{-5} \text{ cm}^2/\text{s})$	Tortuosity factor x FDEP literature
		value
Discharge duration	438,000 hr (50 years)	Based on site operation and regional
		oil-production history
Discharge rate	1.1x10 <sup>-4</sup> kg/hr (0.96 kg/yr)	Inferred from model output

Table Notes:

FDEP: Florida Department of Environmental Protection. Technical Report: Development of Cleanup Target Levels (CTLs), For Chapter 62-777, F.A.C. University of Florida Center for Environmental & Toxicology. February 2005.

NMOSE: New Mexico Office of the State Engineer records for available water well logs in Township 19 South Range 38 East. http://iwaters.osc.state.nm.us;7001/iWATERS/

TWDB: Texas Water Development Board, Report 288, Evaluating the Ground Water Resources of the High Plains of Texas. May 1984.

EPA: United States Environmental Protection Agency. Understanding Variation in Partitioning Coefficient,  $K_{dr}$  Values (402-R-99-004B). August 1999.

Mr. Wayne Price October 11, 2007 Page 3 of 5

The historical groundwater analytical results from monitoring wells MW-13 and MW-20 were the primary calibration targets along the longitudinal axis of the model. Additionally, the analytical data from monitoring wells MW-3 and MW-5 (located approximately 25 meters north of the plume's longitudinal axis, and having chromium concentrations below 0.01 mg/l), were used to calibrate the transverse axis of the model. Figure 1 depicts the location of the monitoring wells. The analytical data used for calibration are as follows:

DATE	MW-19	MW-13	MW-4	MW-4D	MW-20
February-03		0.151	0.271		
May-03		0.158	0.201		
August-03		0.191	0.187		
November-03		0.180	0.161		
March-04		0.179	0.163		
June-04		0.166	0.117		
October-04		0.199	0.161		
July-05	0.001	0.092	0.058	0.110	0.054
October-05	0.003	0.100	0.063	0.089	0.057
January-06	ND	0.110	0.047	0.060	0.047
April-06	ND	0.044	0.035	0.043	0.072
February-07		0.110		0.016	0.042
July-07		0.009		0.019	0.048

Table Notes:

Dissolved chromium is presented in mg/l

MW-4D, MW-19 and MW-20 were installed in July 2005.

Data from MW-4D and all data collected after April 2006 were not used in the model calibration

WSP Environmental Strategies applied AT123D by first calibrating the model using traditional trial and error methods to approximate the field observations. During the calibration, various combinations of input parameters were used to simulate the observed plume behavior; and the final calibrated model represents the scenario with the most plausible combination of input parameters and the best match to the observed analytical data. The final calibrated model output shows a continuous or sustained release, steady-state dispersing plume. This can be considered to be the upper-bound envelope of chromium concentrations in groundwater (calibrated to the maximum historical concentrations).

### **Simulated Plume Behavior**

The series of model outputs simulating a steady-state plume were developed in the January 2007 letter summarizing the modeling effort. The model output indicated that the plume reaches a steady state after 10 years, in other words, the output for a 10-year release duration would attain the same plume dimensions as a release of 50 years or more, as long as it had a steady contaminant flux from the soil to groundwater. The maximum pre-2007 concentrations are represented as the "Baseline" curve, on Figure 2.

Figure 2 depicts the longitudinal profile along the centerline, at a depth of 1.5 meters below the water table, for steady-state sources of varying magnitudes ranging from  $\frac{1}{2}$  to  $\frac{1}{8}$  times the

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Mr. Wayne Price October 11, 2007 Page 4 of 5

Baseline curve. These curves simulate the concentrations along the plume's centerline, caused by an attenuating source, reducing in half, then quarter, then eighth. Because there are infinite gradations between these points, these intervals were selected only for reference. The general shape of the infinite number of curves would be similar, though. Because it takes approximately ten years for each profile to attain steady state, a source that has a half-life of less than ten years would exhibit slightly different profiles, but would not exceed the upper-bound envelope represented by the Baseline curve.

# **Data Comparison**

Figures 3 and 4 show the data from MW-13, MW-4 and MW-20 from July and October 2005. They correspond very well to the  $\frac{1}{2}$  Baseline curve. The error bars shown are +/- 20%, which is the acceptable tolerance, referred to as relative percent difference (RPD), for two measurements of the same sample using EPA Method 6010, which was the analytical method used in this project.

Figures 5 and 6 show the data from January and April 2006. They correspond well with the  $\frac{1}{2}$  and  $\frac{1}{4}$  Baseline curves, with the upgradient part of the plume corresponding better with the  $\frac{1}{4}$  Baseline curve, and the downgradient part still corresponding with the  $\frac{1}{2}$  Baseline curve.

Figures 7 and 8 show data from February and July 2007. The upgradient data correspond well with the  $\frac{1}{4}$  Baseline curve, the middle of the plume corresponds with the  $\frac{1}{4}$  Baseline, and the downgradient data still corresponds with the  $\frac{1}{2}$  Baseline.

As predicted in the January modeling letter, there appears to be a lag in response between decreases in the concentrations near the source area compared with concentrations at distal wells. These comparisons indicate that the source is attenuating faster than the downgradient plume can equilibrate with.

WSP Environmental Strategies tabulated data points for MW-13, MW-4, MW-4D and MW-20, using the Mann Kendall statistical method to evaluate trends in the dissolved chromium data. The method is valid for up to ten data points, in chronological order and includes an estimate of the percent confidence level that a data set is decreasing or increasing. As shown on Table 1, the overall concentrations trends are declining or stable. There is at least 90 percent confidence that MW-13, MW-4 and MW-4D are decreasing and MW-20 is stable. Furthermore, the concentrations have attenuated to less than the New Mexico Water Quality Control Commission standard for groundwater protection 0.05 mg/l in all of the wells monitored.

### **Conclusions**

The site data correspond reasonably well with the model simulation of a declining source, including some lag time between changes in groundwater concentrations in the source area compared with those at distal wells. The chromium concentrations in soil suggest the source has depleted itself.

# **Recommendations**

Because dissolved chromium concentrations at MW-13 and MW-4D statistically decreasing (with more than 90% confidence) and are currently less than 0.05 mg/l, and concentrations at MW-20 are stable and less than 0.05 mg/l, Champion Technologies and WSP Environmental Strategies recommend that abatement activities at the site be terminated.

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If you have any questions regarding this matter, please contact us at (303) 850-9200 or <u>manley.tom@wspgroup.com</u>.

Sincerely yours,

Manley Tom, P.E. Technical Manager

Enclosure

cc/encl:



Mr. Chris Williams, New Mexico Oil Conservation Division
Mr. Marty Brown, Champion Technologies Inc.
Mr. Dwight Vorpahl, Champion Technologies Inc.
Mr. Brian Friedman, Champion Technologies Inc.
Mr. Juan Alvarado, Champion Technologies Inc.
Mr. John Simon, WSP Environmental Strategies LLC

Figures



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Figure 2

Theoretical Curves for Declining Sources: Longitudinal Profile at the Centerline



Page 1 of 1 Revised: 8/27/07

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# July 2005 Data Compared with Theoretical Curves Champion Technologies, Inc. Site Hobbs, New Mexico



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Page 1 of 1 Revised: 8/27/07

 Figure 4







Page 1 of 1 Revised: 8/27/07



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Page 1 of 1 Revised: 8/27/07

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Figure 6

April 2006 Data Compared with Theoretical Curves



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Page 1 of 1 Revised: 8/27/07

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Page 1 of 1 Revised: 8/27/07

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Figure 8



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Page 1 of 1 Revised: 8/27/07

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Tables

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#### Table 1 Mann Kendall Trend Analysis - Chromium (µg/L) Champion Technologies Inc. Site Hobbs, New Mexico

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	Well >	MW-13	MW-4D	MW-20	MW-4		
Event	Sampling Date						
1	4-Nov-03	180			161		
2	17-Mar-04	179			163		
3	25-Jun-04	166		_	117		
4	5-Oct-04	199			161		
5	26-Jul-05	92	110	54	58		
6	25-Oct-05	100	89	57 .	6,1		
7	6-Jan-06	110	61	-17	47		
8	6-Apr-00	44	43	72	35		
9	8-Feb-07	110	16	42			
10	31-Jnj-07	ND 9.3	19	48			
Mitchight		ahalaala kataa kata	olimistication and the	Million Million	in manager and a second	nininkonaloolalaini	alisman kashali da kan
1000 and	Mann Kendall Statistic (S) *	+26.0	-13.0	-3.0	-21.0	0.0	0.0
	Number of Rounds (n) =	10	6	6	8	0	0
	Average =	118.93	56.17	53.33	100.63	#DIV/0!	#DEV/0!
mar hand	Standard Deviation =	62.219	37.839	10.577	55.887	#DIV/0!	#DIV/01
anannene	Coefficient of Variation(CV)=	0.523	0.674	. 0,198	0.555	#DIV/0!	#DIV/01
Error Chee	ck, Blank if No Errors Detected					n<4	n<4
Trend ≥8	0% Confidence Level	DECREASING	DECREASING	No Trend	DECREASING	n<4	n<4
Trend $\geq 9$	1% Confidence Level	DECREASING	DECREASING	No Trend	DECREASING	n<4	n<4
Stability T	est. If No Trend Exists at			_CV <= 1		n<4	n<4
80% Con	fidence Level	NA	NA	STABLE	NA	n<4	n<4
in an	Data Entry By =	MT	Date =	26-Aug-07	Checked By =	MT	

WQCC standard is 50 µg/L. Concentration exceeding the standard are BOLDFACE

THIS BLOCK OF CE	IIS BLOCK OF CELLS IS USED TO SEARCH FOR DATA ENTRY ERRORS												
DATA ERR	Event Number	MW-13	MW-4D	MW-20	MW-4	0	0						
CHECKS		-1		-1	-1	-1	-1						
Checks	2	-1	-1	-1	-1	-]	-1						
for data with	3	-1			-1	-1	-1						
values less	4			-1	-1		•						
than zero or	5	-1	- 1	-1		-1	-1						
text (a space	6			-1	-1		-1						
is seen as	7	· •1	i	-1	-1	-1	-1.						
text in Excel).	8			-1	-1	-1	-1						
Minus one (-1)	9	-1	-1	-1	-1	-1	-1						
shown if no	10	-1		-1	-1	-1	-1						
error.	Data error in column?	no err	no en	no em	no err	по еп	по етт						

THIS BLOCK OF CELLS USED TO FIND ERRORS IN DATES

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DATE ERR	Date	Text in Date?	Consecutive?	Data w no date?
CHECKS	4-Nov-03	-1	-1	-1
	17-Mar-04	-1	-1	-1
Checks	25-Jun-04	-1	-1	-
include	5-Oct-04	-1	-1	-1
a test for	26-Jul-05	-1		· · · · · ·
consecutive	25-Oct-05		-1	-
dates and	6-Jan-06	-1	-1	-
text. Minus	6-Apr-06	-1	-1	-1
one (-1)	8-Feb-07	-1	- }	-1
shown if no	31-Jul-07	-1	-1	
error.	Date Error?	no err	no err	no err

MNA Guidance							
Values of n	Smax@0.2	Smax@0.1					
4	-4	-6					
5	-5	-7					
6	-6	-8					
7	-7	-10					
8	-8	-11					
9	-10	-14					
10	-ii	-16					
TEST	Number of Rounds		MW-4D	MW-20		0	
FOR							
INCREASING							
OR	5						
DECREASING	6		-1	0			
TREND	7						
@ 80 %	8				-1		
If +1, Incrsng	9						
If -1, decrstig	10	-1					
If 0, neither.		Decreasing	Decreasing	Neither	Decreasing	Neither	Neithe
TEST	Number of Rounds	MW-13	MW-4D	MW-20	MW-4	0	
FOR						-	
INCREASING	4						
OR	5						
DECREASING	6		-1	0			
TREND	7						
@ 90 %	8				-1		
If +1, Incrsng	9						
If -1, decrsng	10	-1					
If 0, neither.		Decreasing	Decreasing	Neither	Decreasing	Neither	Neithe

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#1	#2	#3	#4	#5	#6	#7	# 8	#9	#10		
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							-1	-1	-1		-3
								- 1	-1		-2
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February 2007 Laboratory Report

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# ANALYTICAL REPORT

Champion, Hobbs NM Project # 131042/1

Lot #: D7B090307

Manley Tom WSP Environmental Strategies, LLC 4600 South Ulster Street Suite 930 Denver, CO 80237

Severn Trent Laboratories, Inc./STL Denver

Alec Kettula-for Gail DeRuzzo

Project Manager

February 20, 2007

# **Table Of Contents**

# Standard Deliverables

# **Report Contents**

# Standard Deliverables

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The **Cover Letter** and the **Report Cover** page are considered integral parts of this Standard Deliverable package. This report is incomplete unless all pages indicated in this Table of Contents are included.

- Table of Contents
- Case Narrative
- Executive Summary Detection Highlights
- Methods Summary
- Method/Analyst Summary
- Lot Sample Summary
- Analytical Results
- QC Data Association Summary
- QC Evaluation and/or Data Reports
- Chain-of-Custody

**Total Number** 

of Pages

# Case Narrative

Enclosed is the report for three samples that arrived at STL's Denver laboratory on February 9, 2007. The results included in this report have been reviewed for compliance with STL's Laboratory Quality Manual (LQM). The test results shown in this report meet all requirements of NELAC and any exceptions are noted below.

Dilution factors and footnotes have been provided to assist in the interpretation of the results. Each sample was analyzed to achieve the lowest possible reporting limit within the constraints of the method. In some cases, due to interference or analytes present at concentrations above the linear calibration curve, samples were diluted. For diluted samples, the reporting limits are adjusted relative to the dilution required.

STL utilizes USEPA approved methods in all analytical work. The samples presented in this report were analyzed for the parameters listed on the analytical methods summary page in accordance with the methods indicated. A summary of quality control parameters is provided below.

This report shall not be reproduced except in full, without the written approval of the laboratory.

# **Quality Control Summary for Lot D7B090307**

# Sample Receiving

The cooler temperature upon receipt at the Denver laboratory was 4.3°C.

The dissolved metals were filtered and preserved at the laboratory.

No anomalies were observed.

#### **Dissolved Metals – Method 6010B**

Laboratory generated matrix spike analysis data have been provided. The MS/MSD associated with batch 7041064 exhibited spike compound recoveries outside the QC limits. The acceptable LCS analysis data indicated that the analytical system was operating within control; therefore, corrective action is deemed unnecessary.

No other anomalies were observed.

# **EXECUTIVE SUMMARY - Detection Highlights**

# D7B090307

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	PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
MW-13	02/08/07 11:15 001	I			
•	Chromium - DISSOLVED	110	10	ug/L	SW846 6010B
MW-4D	02/08/07 12:45 002				
	Chromium - DISSOLVED	16	10	ug/L	SW846 6010B
MW-20	02/08/07 13:30 003				
	Chromium - DISSOLVED	42	10	ug/L	SW846 6010B

# **METHODS SUMMARY**

# D7B090307

PARAMETER	ANALYTICAL METHOD	PREPARATION METHOD
Inductively Coupled Plasma (ICP) Metals	SW846 6010B	SW846 3005A
References:		4

SW846

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

# **METHOD / ANALYST SUMMARY**

#### D7B090307

ANALYTICAL							
METHOD	ANALYST	<u>ID</u>					
SW846 6010B	Janel Motichka	2862					

# References:

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

# SAMPLE SUMMARY

#### D7B090307

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
JN8FD	001	MW-13	02/08/07	11:15
JN8FF	002	MW-4D	02/08/07	12:45
JN8FG	003	MW-20	02/08/07	13:30

#### NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.

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

- Results noted as "ND" were not detected at or above the stated limit.

- This report must not be reproduced, except in full, without the written approval of the laboratory.

- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor,

paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

# Client Sample ID: MW-13

# DISSOLVED Metals

Lot-Sample #...: D7B090307-001

Date Sampled...: 02/08/07 11:15 Date Received..: 02/09/07

Matrix....: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #
Prep Batch #.	: 7041064					
Chromium	110	10	ug/L	SW846 6010B	02/13/07	JN8FD1AA
		Dilution Facto	or: 1	Analysis Time: 17:39	MDL	: 2.6

# Client Sample ID: MW-4D

#### DISSOLVED Metals

Lot-Sample #...: D7B090307-002 Date Sampled...: 02/08/07 12:45 Date Received..: 02/09/07

5 Date Received..: 02/09/07

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Matrix..... WATER

		REPORTIN	١G		PREPARATION-	WORK
PARAMETER	RESULT	LIMIT	UNITS	METHOD	ANALYSIS DATE	ORDER #
Prep Batch #	: 7041064					
Chromium	16	10	ug/L	SW846 6010B	02/13/07	JN8FF1AA
		Dilution Fac	ctor: 1	Analysis Time: 17:4	3 MDL	.: 2.6

# Client Sample ID: MW-20

#### DISSOLVED Metals

Lot-Sample #...: D7B090307-003 Date Sampled...: 02/08/07 13:30 Date Received..: 02/09/07 Matrix....: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #
Prep Batch #	: 7041064					
Chromium	42	10	ug/L	SW846 6010B	02/13/07	JN8FG1AA
		Dilution Facto	or: 1	Analysis Time: 17:48	MDL	: 2.6

# QC DATA ASSOCIATION SUMMARY

# D7B090307

Sample Preparation and Analysis Control Numbers

SAMPLE#	MATRIX	ANALYTICAL METHOD	LEACH BATCH #	PREP BATCH #	MS RUN#
001	WATER	SW846 6010B		7041064	7041045
002	WATER	SW846 6010B		7041064	7041045
003	WATER	SW846 6010B		7041064	7041045

# METHOD BLANK REPORT

# DISSOLVED Metals

Client Lot #	: D7B090307			M	atrix: WA	TER
PARAMETER	RESULT	REPORTII LIMIT	IG UNITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #
MB Lot-Sampl	<b>e #:</b> D7B100000	-064 Prep 1	Batch #:	7041064		
Chromium	ND	10	ug/L	SW846 6010B	02/13/07	JN8TP1AF
		Dilution Fac	tor: 1			
		Analysis Tir	ne: 16:35			

# NOTE(S):

# LABORATORY CONTROL SAMPLE EVALUATION REPORT

# DISSOLVED Metals

Client Lot #:	D7B090307			<b>M</b> atrix W						
PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #					
LCS Lot-Sample#: Chromium	D7B100000- 103	064 <b>Prep Ba</b> (90 - 113) Dilution Facto	t <b>ch #:</b> 7041064 SW846 6010B r: 1 Analysis	02/13/07 Time: 16:40	JN8TP1AU					

# NOTE(S):

# LABORATORY CONTROL SAMPLE DATA REPORT

# DISSOLVED Metals

Client Lot #	<b>‡:</b> D71	Matrix	WATER				
PARAMETER	SPIKE	MEASURED		PERCNT	MTTUOD	PREPARATION-	WORK
ICE Lot Com							• • <u></u>
nes nor-squit	pre#: D/1	3100000-06	4 Prep I	satch #	7041064		
Chromium	200	206	ug/L	103	SW846 6010B	02/13/07	JN8TP1AU
		D	ilution Fac	tor: 1	Analysis Time	: 16:40	

# NOTE(S):

#### MATRIX SPIKE SAMPLE EVALUATION REPORT

# DISSOLVED Metals

Client Lot # Date Sampled	L: D7B09	90307 5/07 14:00 <b>Date H</b>	eceived.	: 02/08/07	Matrix	: WATER
PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS RPD	RPD LIMITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #
<b>MS Lot-Samp]</b> Chromium	e #: D7B08 70 N 74	30160-001 <b>Prep H</b> (73 - 135) (73 - 135) 3.5 Dilution Fac	<b>Batch #.</b> . (0-25)	: 7041064 SW846 6010B SW846 6010B	02/13/07 02/13/07	JN4191CD JN4191CE
		Analysis Tim	e: 16:54	:		

#### NOTE(S):

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

N Spiked analyte recovery is outside stated control limits.

#### MATRIX SPIKE SAMPLE DATA REPORT

#### DISSOLVED Metals

Client Lot Date Samp]	: #: led:	D7B0903 02/06/0	07 7 14:00	Date Recei	<b>ved:</b> 02/	/08/07	]	Matrix	<b>C</b> WA'I'	ER
PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASRD AMOUNT	UNITS	PERCNT RECVRY F	RPD M	ETHOD		PREPARATION- ANALYSIS DATE	WORK ORDER #
<b>MS Lot-San</b> Chromium	mple #:	D7B0801	60-001	Prep Batch	<b>#:</b> 704	1064				
5	52	200	193 N	ug/L	70	ST	W846 60	10B	02/13/07	JN4191CI
5	52	200	200	ug/L	74 3	3.5 SI	W846 60	10B	02/13/07	JN4191C
			Dilu Anal	ition Factor: 1 Lysis Time: 1	L L 6 : 54				·	

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# NOTE(S):

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

N Spiked analyte recovery is outside stated control limits.

			Sample	STL Denvel Receiving	r Checkli	st		
Lot #:	$\sum$	7-13090307	۷	Date/Time Rec	ceived: Z	1.902	400	
Comp	any N	ame & Sampling S	Site: WS	P - CHA	mpau	HOBBS	Ì	
	2		provention of the product of the second s		<b>z</b>		·······	
PM to Residua	<b>Compl</b> al chior	ete This Section: Yes ine check required.	No P	Quarantine	Yes ed :	No D		
Quote #	¥: (	65831-E	·					
Special	Instruc	ctions:						
•								
m. 7								
• EDT/	one: EST • (	CDT/CST • MDT/MS	T • PDT/PST • O	THER				
Unpac	cking Cooler	Checks: #(s):						
N/A Y	atures ( Tes No	(). <u>-1. </u>				- <u></u> -		Initials
		1. Cooler seals inta	ct? (N/A if hand d	elivered) If no, do	cument on CL	IR.		$\mathcal{L}$
, ,	- 0	2. Chain of custody	y present? If no, doc	cument on CUR.				y-
	Ę,	3. Bottles broken a	nd/or are leaking? I	f yes, document o	n CUR.			
	Z	4. Multiphasic sam	ples obvious? If ye	s, document on Cl	JR.			
		5. Proper container	· & preservatives us	ed? (ref. Attachm	ent D of SOP#	DEN-QA-0003)	If no, docume:	nt on CUR.
a o		6. pH of all sample	s checked and meet	t requirements? If	no, documen	on CUR.		
Z		7. Sufficient volum document on CU	e provided for all a JR, and contact PM	nalysis requested? before proceeding	' (ref. Attachn g.	ient D of SOP# DE	N-QA-0003)	If no,
đ		8. Did chain of cust	tody agree with lab	els ID and sample	s received? If	no, document on C	UR.	
ø d		9. Were VOA sam	ples without heads	oace? If no, docun	nent on CUR.			
		10. Were VOA vials	s preserved? Preser	vative DHCl D4	±2°C □Sodie	m Thiosulfate 🖵 A	scorbic Acid	
ū	A	[11. Did samples requ	lite preservation wi	ith sodium thiosul	fate?			
		12. If yes to #11, did	the samples contai	in residual chlorin	e? If yes, doci	ment on CUR.		
ଏ ପ	ū	13. Sediment present	t in dissolved/filtere	ed bottles? If yes,	document on	CUR.		
ם ע	Ģ	<ol> <li>Is sufficient volu contact PM before</li> </ol>	me provided for cli re proceeding.	ient requested MS	, MSD or mat	rix duplicates? If no	o, document o	n CUR, and
	1	15. Receipt date(s) >	· 48 hours past the c	collection date(s)?	If yes, notify	PA/PM.		
	₽	16. Are analyses with	h short holding time	es requested?				
		17. Was a quick Tur	n Around (TAT) re	quested?				

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# STL Denver Sample Receiving Checklist

Lot # D73090307

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Log	gin C	Theo	ks:	Initials	
N/A	Yes	No		10-	
	<b>Z</b>			Sufficient volume provided for all analysis requested? (ref. Attachment D of SOP# DEN-QA-0003) If no, document on CUR, and contact PM before proceeding.	
Ø			19.	Is sufficient volume provided for client requested MS, MSD or matrix duplicates? If no, document on CUR, and contact PM before proceeding.	
			20.	Did the chain of custody includes "received by" and "relinquished" by signatures, dates, and times?	
a	á		21.	Were special log in instructions read and followed?	
Ð			22.	Were AFCEE metals logged for refrigerated storage?	
		Ó	23.	Were tests logged checked against the COC? Which samples were confirmed?	
ф			24.	Was a Rush form completed for quick TAT?	
ф	۵		25.	Was a Short Hold form completed for any short holds?	
		ф	26.	Is "Strict ICOC" required?	
		9	27.	Were special archiving instructions indicated in the General Comments? If so, what were they?	

# Labeling and Storage Checks:

P	- 🗖		28. Was the subcontract COC signed and sent with samples to bottle prep?	
			29. Were sample labels double-checked by a second person?	
A	Ō		30. Were sample bottles and COC double checked for dissolved/filtered metals by a second person?	
	Ø		31. Did the sample ID, Date, and Time from label match what was logged?	
ц,			32. Were stickers for special archiving instructions affixed to each box and to the ICOC? See #27	
			33. Were AFCEE metals stored refrigerated?	
		۵	34. Were "Strict ICOC" copies given to satellite storage areas?	

Initials

Document any problems or discrepancies and the actions taken to resolve them on a Condition Upon Receipt Anomaly Report (CUR).

	ied Analyses No. No.			/ / / Remarks	STL SHALL FILTER	THE SAMPLES PRICE	TO ACIDIFYING	-							a the second sec	WSP ENVIRONMENTAL STRATEGIES COMENTENCE HC	A CUMINTA TECHNICAL SERVICES COMPANY	outh Ulster, # 930, Denver, CO 80237 'ax: (303) 850-9214 23 North 3rd St, #706, Minneapolis, MN 55401
	E C Request	E a a a a a a a a a a a a a a a a a a a	Treffer				X							Laboratory Name: Sn	Eaboratory Location: ADVANA	Custody Seal Numbers:	Method of Shipment: HAND	Z       Denver Office: 4600 S         Tel: (303) 850-9200, F         □       Minneapolis Office: 12         □       Minneapolis Office: 12
	<u>Matrices</u> : S = Soil; Aq = Water	A = Air; Bu = Bulk; W = Wipe Bi = Biora	OW = Oily Waste; O = Other	Time Matrix	1115 AQ 1	1245 Ap 1	1330 Ag 1							tre):		ire):		VA 20190 , Moon Twp, PA 15108
4.55 palezar	ject Number: Site and Location: Sicot2 CHANPION, HOBBS NM	npler's Name(s): AVID CARSTENS	npler's Signature(s):	mole Identification:	M-13 28/07	N-40	V-20							inquished by (Signature):	Date Time W	inquished by (Signature): Date   Time	n-Around Time: Tracking Number:	Reston Office: 11911 Freedom Dr, # 900, Reston, V         Tel: (703) 709-6500, Fax: (703) 709-8505         Pittsburgh Office: 300 Corporate Center Dr, # 200, Fax: (703) 703 Fax: (703) 703 Fax: (703) 704 Fax:

.

August 2007 Laboratory Report

# STL

STL Denver 4955 Yarrow Street Arvada, CO 80002

Tel: 303 736 0100 Fax: 303 431 7171 www.stl-inc.com

# ANALYTICAL REPORT

Champion, Hobbs NM Project # 131042/1

Lot #: D7H010218

# Manley Tom WSP Environmental Strategies, LLC 4600 South Ulster Street Suite 930 Denver, CO 80237

TestAmerica Denver

Gail DeRuzzo Project Manager

August 14, 2007

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Leaders in Environmental Testing

# **Table Of Contents**

# **Standard Deliverables**

# **Report Contents**

# Standard Deliverables

The **Cover Letter** and the **Report Cover** page are considered integral parts of this Standard Deliverable package. This report is incomplete unless all pages indicated in this Table of Contents are included.

- Table of Contents
- Case Narrative
- Executive Summary Detection Highlights
- Methods Summary
- Method/Analyst Summary
- Lot Sample Summary
- Analytical Results
- QC Data Association Summary
- Chain-of-Custody

# Total Number of Pages

1	
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# Case Narrative

Enclosed is the report for four samples that arrived at TestAmerica's Denver laboratory on August 1, 2007. The results included in this report have been reviewed for compliance with TestAmerica's Laboratory Quality Manual (LQM). The test results shown in this report meet all requirements of NELAC and any exceptions are noted below.

Dilution factors and footnotes have been provided to assist in the interpretation of the results. Each sample was analyzed to achieve the lowest possible reporting limit within the constraints of the method. In some cases, due to interference or analytes present at concentrations above the linear calibration curve, samples were diluted. For diluted samples, the reporting limits are adjusted relative to the dilution required.

TestAmerica utilizes USEPA approved methods in all analytical work. The samples presented in this report were analyzed for the parameters listed on the analytical methods summary page in accordance with the methods indicated. A summary of quality control parameters is provided below.

This report shall not be reproduced except in full, without the written approval of the laboratory.

# **Quality Control Summary for Lot D7H010218**

## Sample Receiving

The cooler temperature upon receipt at the Denver laboratory was 3.4°C.

The dissolved metals were filtered and preserved at the laboratory.

No anomalies were observed.

**Dissolved Metals – Method 6010B** No anomalies were observed.

# **EXECUTIVE SUMMARY - Detection Highlights**

# D7H010218

	PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
MW-13	07/31/07 09:45 001				
	Chromium - DISSOLVED	9.3 B	10	ug/L	SW846 6010B
MW-99	07/31/07 09:30 002				
	Chromium - DISSOLVED	11	10	ug/L	SW846 6010B
MW-4D	07/31/07 10:45 003				
	Chromium - DISSOLVED	19	10	ug/L	SW846 6010B
MW-20	07/31/07 11:30 004				
	Chromium - DISSOLVED	48	10	ug/L	SW846 6010B

# **METHODS SUMMARY**

# D7H010218

PARAMETER	ANALYTICAL METHOD	PREPARATION METHOD
Inductively Coupled Plasma (ICP) Metals	SW846 6010B	SW846 3005A
References:		

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

# **METHOD / ANALYST SUMMARY**

# D7H010218

ANALYTICAL METHOD	ANALYST	ANALYST
SW846 6010B	Lynn-Anne Trudell	6645
References:		

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

# SAMPLE SUMMARY

# D7H010218

<u>wo #</u>	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
	0.01	MW - 1 3	07/31/07	09.45
J31AA	002	MW-99	07/31/07	09:30
J31AC	003	MW-4D	07/31/07	10:45
J31AD	004	MW-20	07/31/07	11:30

#### NOTE (S) :

- The analytical results of the samples listed above are presented on the following pages.

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

- Results noted as "ND" were not detected at or above the stated limit.

- This report must not be reproduced, except in full, without the written approval of the laboratory.

- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor,

paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

# Client Sample ID: MW-13

# DISSOLVED Metals

Lot-Sample #. Date Sampled.	Matrix:	WATER				
PARAMETER	RESULT	REPORTIN LIMIT	IG UNITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #
Prep Batch #.	: 7218455					
Chromium	9.3 B	10	ug/L	SW846 6010B	08/09-08/10/07	J30991AA
		Dilution Fac	tor: 1	Analysis Time: 00:59	MDL	: 2.6

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# NOTE(S):

B Estimated result. Result is less than RL.

Client Sample ID: MW-99

# DISSOLVED Metals

Lot-Sample #...: D7H010218-002 Date Sampled...: 07/31/07 09:30 Date Received..: 08/01/07 Matrix....: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #
Prep Batch #	: 7218455					
Chromium	11	10	ug/L	SW846 6010B	08/09-08/10/07	J31AA1AA
		Dilution Facto	or: 1	Analysis Time: 01:04	MDL	: 2.6

# Client Sample ID: MW-4D

# DISSOLVED Metals

Lot-Sample #...: D7H010218-003

Matrix....: WATER

Date Sampled...: 07/31/07 10:45 Date Received..: 08/01/07

PARAMETER	RESULT	REPORTING	UNITS	METHOD	PREPARATION- ANALYSIS DATE	WORK <u>ORDER #</u>
Prep Batch #	<b>::</b> 7218455					
Chromium	19	10	ug/L	SW846 6010B	08/09-08/10/07	J31AC1AA
		Dilution Fact	or: l	Analysis Time: 01:09	MDL	: 2.6

Client Sample ID: MW-20

#### DISSOLVED Metals

Lot-Sample #...: D7H010218-004

Date Sampled...: 07/31/07 11:30 Date Received..: 08/01/07

Matrix....: WATER

PARAMETER	RESULT	, REPORTING LIMIT	UNITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER_#
Prep Batch #. Chromium	: 7218455 <b>48</b>	10	ug/L	SW846 6010B	08/09-08/10/07	J31AD1AA
		Dilution Facto	or: 1	Analysis Time: 01:14	MDL	: 2.6

# QC DATA ASSOCIATION SUMMARY

# D7H010218

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Sample Preparation and Analysis Control Numbers

SAMPLE#	MATRIX	ANALYTICAL METHOD	LEACH <u>BATCH #</u>	PREP BATCH #	<u>MS RUN#</u>
001	WATER	SW846 6010B		7218455	7218258
0.02	WATER	SW846 6010B		7218455	7218258
003	WATER	SW846 6010B		7218455	7218258
004	WATER	SW846 6010B		7218455	7218258

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#### METHOD BLANK REPORT

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# DISSOLVED Metals

Client Lot #: D7H010218			Matrix WATER			
PARAMETER	RESULT	REPORTI	NG UNITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #
MB Lot-Sample	• #: D7H060000	-455 Prep	Batch #:	: 7218455		
Chromium	ND	10	ug/L	SW846 6010B	08/09-08/10/07	J39491AD
		Dilution Fa	ctor: 1			
		Analysis Ti	me: 00:48			

# NOTE(S):

### LABORATORY CONTROL SAMPLE EVALUATION REPORT

# DISSOLVED Metals

Client Lot #:	D7H010218			Matrix	: WATER
PARAMETER	PERCENT <u>RECOVERY</u>	RECOVERY LIMITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #
LCS Lot-Sample#: Chromium	D7H060000 101	455 <b>Prep Bat</b> (90 - 113) Dilution Facto	t <b>ch #:</b> 7218455 SW846 6010B r: 1 Analysis	08/09-08/10/07 Time: 00:54	J39491AE

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NOTE(S):

# LABORATORY CONTROL SAMPLE DATA REPORT

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#### DISSOLVED Metals

Client Lot #: D7H010218 Matrix: WATER									
PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCNT <u>RECVRY</u>	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER_#		
LCS Lot-Sample#: D7H060000-455 Prep Batch #: 7218455									
Chromium	200	202	ug/L	101	SW846 6010B	08/09-08/10/07	J39491AE		
		Di	lution Factor:	: 1	Analysis Time. : 0	0:54			

# NOTE(S):

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

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## MATRIX SPIKE SAMPLE EVALUATION REPORT

#### DISSOLVED Metals

Client Lot # Date Sampled	: D7H01 : 07/30	0218 /07 12:40 <b>Date Re</b>	eceived.	.: 08/0	01/07	Matrix	: WATER
	PERCENT	RECOVERY	RPD			PREPARATION-	WORK
PARAMETER	RECOVERY	LIMITS RPD	LIMITS	METHOL	>	ANALYSIS DATE	ORDER #
MS Lot-Sample	e #: D7H01	0212-001 Prep Ba	atch #	.: 7218	3455		
Chromium	100	(73 ~ 135)		SW846	6010B	08/09-08/10/07	J309H1A3
	100	(73 - 135) 0.05	(0-25)	SW846	6010B	08/09-08/10/07	J309H1A4
		Dilution Fact	or: 1				
		Analysis Time	: 01:45				

# NOTE(S):

#### MATRIX SPIKE SAMPLE DATA REPORT

## DISSOLVED Metals

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SAM PARAMETER AMO	IPLE SPIKE PUNT AMT	MEASRD AMOUNT	UNITS	PERCNT RECVRY	RPD	METHO	<u>)                                    </u>	PREPARATION- ANALYSIS DATE	WORK <u>ORDER #</u>
MS Lot-Sample Chromium	#: D7H010	212-001	Prep Batch	<b>#:</b> 7;	21845	5			
ND	200	201	ug/L	100		SW846	6010B	08/09-08/10/07	J309H1A3
ND	200	201	ug/L	100	0.05	SW846	6010B	08/09-08/10/07	J309H1A4
		Dilut	ion Factor: 1						•
		Analy	vsis Time: 01	:45					

# NOTE (S) :

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

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21.1 tol.2							1			
Project Number: Site and Location:	•	Matrices: s = Snil			n N	/			_	
151042/1 CHMMPION- MODE N	T	Aq = Water	٦	e	m's pole	_	/	/	/	
		W = Wipe		Itaine	520	/	-		<u> </u>	
DAVID CHESTENS		Bi = Biota;		Cor	0 0 (e#)	/	/	/	<u> </u>	
Sampler's Signature(s):		OW = Oily wa O = Other	iste;	er of	12 2			/	<u> </u>	
Sample Identification:	Date	Time	Matrix	Numl	Diss Ef	/			<u> </u>	Remarks
MW-13	7 31 07	0945	Ð	_	X				ও	1. SHALL FILTER
MM-99		0930	ð	-	<u>Х</u>		<u> </u>		ß	MPLESS PRIOR TO
MW-4D		1045	AQ		X				Ac	IDIFYING
MW-20		1130	Að	-	X					
				_						
				<u> </u>				_		
				_						
Relinquished by (Signature):	ved by (Signati	ure):			aboratory Nair	ie: STL		- WS	P	
Relinquished by (Signature):	ved by (Signat	ure):			Custody Seal N	umbers:				
Turn-Around Time: STANDARD	ing Number:	$\mathcal{T}$	•	7	Aethod of Ship	ment: HAN	A		A Qua	NTPA TECHNICAL SERVICES COMPANY
□ Reston Office: 11911 Freedom Dr, # Tel: (703) 709-6500, Fax: (703) 709 □ Pittsburgh Office: 300 Corporate Cer Tel: (412) 604-1040 Fax: (412) 604	900, Reston, 1-8505 1ter Dr, # 200	VA 20190 , Moon Tw	p, PA 15	5108		Denver Offi Tel: (303) 8 Minneapolis	ce: 4600 S 50-9200, J s Office: 1 s 43-0510	South Ulste Fax: (303) 23 North 3 Fax: (612)	r, # 930, I 850-9214 rd St, #70 343-050	Denver, CO 80237 6, Minneapolis, MN 5540J

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Ref. 🔸 La 🔎 🛶

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		STL Denver	
		Sample Receiving Checklist	
L	ot #:_		
Сс	ompa	any Name & Sampling Site: <u>WSP - Champion Hobbs</u>	
میں رہے۔ میں اور			
PN Re	4 to C sidual	Complete This Section: Yes       No       Yes       No         I chlorine check required: $\Box$ $\Delta$ Quarantined : $\Box$ $\Box$	
Qu	01e #:		
Spe	ecial l	nstructions:	
		· · ·	
Tio	. 700		
• EI	DT/ES	ST • CDT/CST • MDT/MST • PDT/PST • OTHER	
Unj	pack	ing Checks:	
	Co	boler #(s):	<u> </u>
Tem	perati	ures (°C): <u>3.4</u>	<u></u>
N/A	Yes	No	Initials D <
Ø		1. Cooler seals intact? (N/A if hand delivered) If no, document on CUR.	
ć	<u>م</u>	2. Chain of custody present? If no, document on CUR.	
	ц -	3. Bottles broken and/or are leaking? If yes, document on CUR.	
		4. Multiphasic samples obvious? If yes, document on CUR.	
	д D	5. Proper container & preservatives used? (ref. Attachment D of SOP# DEN-QA-0003) If no, docum	ent on CUR.
		<ul> <li>D. prior an samples checked and meet requirements? If no, document on COK</li> <li>T. Sufficient volume provided for all analysis requested? (ref. Attachment D of SOP# DEN OA 0002)</li> </ul>	) If no
	<i>y</i>	document on CUR, and contact PM before proceeding.	, <u>пп</u> ,
	Ø	8. Did chain of custody agree with labels ID and samples received? If no, document on CUR.	
p :	D	$\Box$ 9. Were VOA samples without headspace? If no, document on CUR.	
		□ 10. Were VOA vials preserved? Preservative □HCl □4±2°C □Sodium Thiosulfate □ Ascorbic Acid	
!	<b>D</b> -	11. Did samples require preservation with sodium thiosulfate?	
וב		□ 12. If yes to #11, did the samples contain residual chlorine? If yes, document on CUR.	
) [		13. Sediment present in dissolved/filtered bottles? If yes, document on CUR.	
נ (	ום	14. Is sufficient volume provided for client requested MS, MSD or matrix duplicates? If no, document of contact PM before proceeding.	on CUR, and
Ę		15. Receipt date(s) > 48 hours past the collection date(s)? If yes, notify PA/PM.	
Ę		16. Are analyses with short holding times requested?	
Ε	]	17. Was a quick Turn Around (TAT) requested?	

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# STL Denver Sample Receiving Checklist

11/วิลเช Lot #

Lo	gin C	Chec	ks:		Initials Min
N/A	Yes	No		_	_UB_
	ø	ū	18.	. Sufficient volume provided for all analysis requested? (ref. Attachment D of SOP# DEN-QA-0003) If document on CUR, and contact PM before proceeding.	f no,
ø	Q	ū	19.	Is sufficient volume provided for client requested MS, MSD or matrix duplicates? If no, document on ( contact PM before proceeding.	CUR, and
J	Я		20.	. Did the chain of custody includes "received by" and "relinquished" by signatures, dates, and times?	
Q	ø	Q	21.	Were special log in instructions read and followed?	
ø	₿ B		22.	Were AFCEE metals logged for refrigerated storage?	
	ø		23.	Were tests logged checked against the COC? Which samples were confirmed?	
ø	Q	Q	24.	Was a Rush form completed for quick TAT?	
ø	Q		25.	Was a Short Hold form completed for any short holds?	
	D,	ø	26.	Were special archiving instructions indicated in the General Comments? If so, what were they?	
Lab	eling	an	d St	torage Checks: In	itials

- 28. Was the subcontract COC signed and sent with samples to bottle prep?
  - □ 29. Were sample labels double-checked by a second person?
- **D O** 30. Were sample bottles and COC double checked for dissolved/filtered metals by a second person?
  - □ 31. Did the sample ID, Date, and Time from label match what was logged?
    - □ 32. Were stickers for special archiving instructions affixed to each box and to the ICOC? See #27
  - □ □ 33. Were AFCEE metals stored refrigerated?

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Document any problems or discrepancies and the actions taken to resolve them on a Condition Upon Receipt Anomaly Report (CUR).