



NON-HAZARDOUS LIQUID WASTE TRANSPORTERS PERMIT APPLICATION

Groundwater Discharges Section, Division of Water
DE Department of Natural Resources and Environmental
Control
89 Kings Highway, Dover DE 19901
(302) 739-9948

1. Permit Number (For renewals only):	DE-WH-012
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2. Company Information

Company Name: Kent County Wastewater Treatment Facility	Telephone: 302-335-6000
	Fax: 3023350365

Address (street, city, state and zip code): 139 Milford Neck Road, Milford, Delaware, 19963

Company Email Address & Contact Name: Colby.Harrington@co.kent.de.us, Colby Harrington

3. Owner/President Business Information

Name: Colby Harrington	Business Telephone: 3023356000
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Business Address if different from above (street, city, state and zip code):

4. Vehicle(s) Information (Attach additional sheets if necessary to identify each vehicle used for transport.)

#	Make	Model	Year	Vehicle Type (Tank, Trailer, Etc.)	License Plate Number	State of Registration	Capacity (gal)
1	Western Star	Honey Dipper	2020	truck	C81209	Delaware	4,700

* Please submit a Certificate of Insurance for each vehicle listed demonstrating commercial automobile liability insurance with a combined single limit of at least \$100,000.

*Certificate of insurance uploaded: **certif of ins.pdf***

5. Please Check Type(s) of Waste Being Transported and Provide the Information Requested in the Indicated Sections for Each Waste Type Checked

		Waste Type	Quantity Collected
	✓		
i.	✓	Septage	200,000 gal/yr
ii.		Holding Tank Waste	gal/yr
iii.		Grease Trap Waste and/or Cooking Oil Waste	gal/yr
iv.		Portable Toilet Waste	gal/yr
v.	✓	Municipal or Industrial Biosolids	10,000 # wet tons/yr
vi.		Sludge From Package Treatment Plants	# wet tons/yr
vii.		Other Non-Hazardous Liquid Waste	gal/yr

Documents required for all new permit applications *and* renewals:

- Attach an Operation Plan detailing the following:
 - a spill reporting and clean-up plan,
 - plans for cleaning vehicles,
 - recordkeeping procedures and
 - days and hours of operation.
- Attach a list of all disposal facilities to be used. Include a copy of the permit/authorization letter from each disposal facility stating the company is currently authorized to discharge the requested waste stream (i.e. septage, holding tank waste, portable toilet waste, etc.) to the facility. Authorization documentation is required for both new and renewal applications.

7 DelC §6023(d): No person shall haul, convey or transport any liquid waste in any container without a license issued by the Department.

Septage
<p>1. Attach a list of all Class F Licensees currently working for the company.</p> <p>If there are no Class F licensees currently working for the company, please note according to Section 4.1.6 of the State of Delaware Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems, all individuals who will be responsible for removal, transportation or disposal of the solid and liquid contents of septic tanks, cesspools, grease traps, seepage pits, holding tanks, portable toilets or other wastewater treatment or disposal facilities must obtain a Class F license before pumping. In order for an individual to obtain a Class F license.</p>
<p>Class F Licenses uploaded: <i>Class F License Holders.docx</i></p>

Holding Tanks
<p>1. Attach a list of all Class F Licensees currently working for the company.</p> <p>If there are no Class F licensees currently working for the company, please note according to Section 4.1.6 of the State of Delaware Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems, all individuals who will be responsible for removal, transportation or disposal of the solid and liquid contents of septic tanks, cesspools, grease traps, seepage pits, holding tanks, portable toilets or other wastewater treatment or disposal facilities must obtain a Class F license before pumping. In order for an individual to obtain a Class F license</p>
<p>Class F Licenses uploaded:</p>

Grease Trap Waste and/or Cooking Oil Waste

1. Attach a list of all disposal facilities to be used.

2. Attach a list of all Class F Licensees currently working for the company.

If there are no Class F Licensees currently working for the company, please note according to Section 4.1.6 of the State of Delaware Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems, all individuals who will be responsible for removal, transportation or disposal of the solid and liquid contents of septic tanks, cesspools, grease traps, seepage pits, holding tanks, portable toilets or other wastewater treatment or disposal facilities must obtain a Class F license before pumping. For a Class F License application, please contact the Licensing Coordinator at 302-739-9948.

Grease Trap Waste Disposal Facilities to be used:

Class F Licenses Uploaded:

Portable Toilets

1. Attach a list of all Class F Licensees currently working for the company.

If there are no Class F Licensees currently working for the company, please note according to Section 4.1.6 of the State of Delaware Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems, all individuals who will be responsible for removal, transportation or disposal of the solid and liquid contents of septic tanks, cesspools, grease traps, seepage pits, holding tanks, portable toilets or other wastewater treatment or disposal facilities must obtain a Class F license before pumping.

Class F Licenses uploaded:

3. Quantity of portable toilets you own:

Municipal and Industrial Biosolids

1. Identify all Facilities the company will service by attaching a table listing the following:

Facility Name of Sludge Generator # Estimated Volume of Sludge to be Transported # Disposal Facility*

* If sludge is to be land applied, include the current Agricultural Utilization Permit Number for that facility.

Municipal and Industrial Biosolids *Disposal Facilities: AGU 2401-K-03 Sludge Permit (12124-113029)-Multi+West Farm.pdf , DM 2402-K-03 Distribution & Marketing Permit (12124-113029) (1).pdf , PERMIT-AGU 2104-K-03 (120121-113026)-Vineyard Farmit (1).pdf*

2. Provide transportation routes from all generating facilities to all applicable disposal facilities.

Municipal and Industrial Biosolids *Transportation Routes: oper plan_disp list.pdf*

3. Indicate any treatment the sludge has undergone before transportation (for example anaerobic digestion, aerobic digestion, lime stabilization, composting, or dewatering).

Sludge Treatment Description Upload: *oper plan_disp list.pdf*

4. Provide results of a laboratory analysis of a representative sample of the sludge which was obtained not more than 6 months before submission of the application unless these results would be submitted as a part of the land application program. The analysis shall include, as a minimum, percent solids, pH, and the dry weight concentration of total nitrogen, ammonium, nitrate, total phosphorous, total potassium, cadmium, copper, mercury, nickel, lead, zinc, arsenic, selenium, and molybdenum.

Sludge From Package Treatment Plants Laboratory Analysis Uploaded: **2025 Kentorganite Lab Results (1).pdf**

Sludge From Package Treatment Plants

1. Identify all Facilities the company will service by attaching a table listing the following:
Facility Name of Sludge Generator # Estimated Volume of Sludge to be Transported # Disposal Facility*
* If sludge is to be land applied, include the current Agricultural Utilization Permit Number for that facility.

Sludge From Package Treatment Plants *Disposal Facilities*:

2. Provide transportation routes from all generating facilities to all applicable disposal facilities.

Sludge From Package Treatment Plants *Transportation Routes*:

3. Indicate any treatment the sludge has undergone before transportation (for example anaerobic digestion, aerobic digestion, lime stabilization, composting, or dewatering).

Sludge Treatment Description Upload:

4. Provide results of a laboratory analysis of a representative sample of the sludge which was obtained not more than 6 months before submission of the application unless these results would be submitted as a part of the land application program. The analysis shall include, as a minimum, percent solids, pH, and the dry weight concentration of total nitrogen, ammonium, nitrate, total phosphorous, total potassium, cadmium, copper, mercury, nickel, lead, zinc, arsenic, selenium, and molybdenum.

Sludge From Package Treatment Plants Laboratory Analysis Uploaded:

Other Non-Hazardous Liquid Wastes

1. Describe the source, nature and make-up of the non-hazardous liquid waste to be transported.

2. Will any of the wastes contain petroleum products (i.e. oil, gas, grease, etc.)?

_____ **Yes** ___ **No** :

* Transportation of liquid wastes containing any petroleum products will require a permit from the Division of Waste & Hazardous Substances (302-739-9400).

Operating Plan
Attach an Operation Plan detailing the following: a spill reporting and clean-up plan, plans for cleaning vehicles, recordkeeping procedures and days and hours of operation.
Operating Plan Upload: <i>oper plan_disp list.pdf</i>

Disposal Facilities
Attach a list of all disposal facilities to be used. Include a copy of the permit/authorization letter from each disposal facility stating the company is currently authorized to discharge the requested waste stream (i.e. septage, holding tank waste, portable toilet waste, etc.) to the facility.
Disposal Facilities Upload: <i>AGU 2401-K-03 Sludge Permit (12124-113029)-Multi+West Farm.pdf</i>

Proof of Bond (If applicable)
Proof of Bond - Part III B, Section 500 of the Guidance and Regulations Governing the Land Treatment of Wastes directs, as a requirement for keeping a permit issued under these Regulations, the permittee to file a bond or other security in the amount of Five Thousand Dollars (\$5,000) with the Department. The bond is to be payable to the Department and the obligation of the bond shall be conditioned upon the fulfillment of all requirements related to the permit. If this application is for permit renewal, please submit a copy of the current Transporters Bond certification.
Proof of Bond Upload: <i>bond exempt.pdf</i>

8. Certification	
I certify that all information submitted as part of this application is true and correct to the best of my knowledge and belief.	
Printed Name of Applicant: Colby Harrington	Date Submitted via DNREC ePermitting: 2026-03-06 12:25:46



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

3/12/2026

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Strategic Insurance Partners 492 Franklin Avenue Nutley NJ 07110	CONTACT NAME: Shannon DeFrancesco PHONE (A/C, No, Ext): (973) 798-0958 E-MAIL ADDRESS:	FAX (A/C, No): (973) 798-0978
	INSURER(S) AFFORDING COVERAGE	
INSURED Kent County Levy Court, Kent County Aeropark Authority 555 Bay Road Dover DE 19901	INSURER A: Ascot Insurance Company	
	INSURER B: Safety National Casualty Corporation	
	INSURER C:	
	INSURER D:	
	INSURER E:	

COVERAGES

CERTIFICATE NUMBER: Cert of Liability-Master

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.


INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:			TRPK-4001215-01	7/1/2025	7/1/2026	EACH OCCURRENCE	\$ 1,000,000
							DAMAGE TO RENTED PREMISES (Ea occurrence)	\$ 100,000
							MED EXP (Any one person)	\$ 10,000
							PERSONAL & ADV INJURY	\$ 1,000,000
							GENERAL AGGREGATE	\$ 2,000,000
							PRODUCTS - COMP/OP AGG	\$ 2,000,000
							Employee Benefits	\$ 1,000,000
A	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> NON-OWNED AUTOS			TRPK-4001215-01	7/1/2025	7/1/2026	COMBINED SINGLE LIMIT (Ea accident)	\$ 1,000,000
							BODILY INJURY (Per person)	\$
							BODILY INJURY (Per accident)	\$
							PROPERTY DAMAGE (Per accident)	\$
								\$
A	<input type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> EXCESS LIAB <input type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$			TRPK-4001215-01	7/1/2025	7/1/2026	EACH OCCURRENCE	\$ 10,000,000
							AGGREGATE	\$ 10,000,000
								\$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N	N/A	AGC 4067217	9/1/2025	9/1/2026	<input checked="" type="checkbox"/> PER STATUTE	
							E.L. EACH ACCIDENT	\$ 1,000,000
							E.L. DISEASE - EA EMPLOYEE	\$ 1,000,000
							E.L. DISEASE - POLICY LIMIT	\$ 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Coverages are subject to Terms, Conditions and Exclusions on the policies. Kent County Wastewater Treatment Facility is additional insured when required by written contract.

Re: 2025 Freightliner 114SD VIN: 3ALHG3DV5SDVT5085

CERTIFICATE HOLDER**CANCELLATION**

DNREC	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE David Wildt/SDF 

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Coverages are subject to Terms, Conditions and Exclusions on the policies. Kent County Wastewater Treatment Facility is additional insured when required by written contract.

Re: 2020 Western Star. VIN: 5KKHAXFE9LLLZ1887

CERTIFICATE HOLDER**CANCELLATION**

DNREC	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE David Wildt/SDF 

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DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

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Re: 2018 Freightliner Van-Con. Vin: 1FVAG3FE2JHJG3336

CERTIFICATE HOLDER**CANCELLATION**

DNREC	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE David Wildt/SDF

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State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that

Robert T Brooks

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 5796F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101, Section 1.0.



Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

This license may be revoked or suspended if the license holder violates any of the lawful rules or regulations of the board, any condition of this license, or the provisions of the act under which the license is issued.

State of Delaware
Department of Natural Resources
and Environmental Control

This certifies that
Robert T Brooks

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License

License Number: 5796F

Issued: 01/01/2026

Expires: 12/31/2026



Signature of Licensee

Sarah Sliyes, Licensing Program Coordinator
DNREC Division of Water

This license issued by the Secretary of the Department of Natural Resources and Environmental Control pursuant to the authorities set forth in 7 Del C. Ch 60, Section 6023, Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101.

For questions related to small systems in:

New Castle County
call 302-739-9947

Kent County
call 302-739-9947

Sussex County
call 302-656-4541

For questions related to large systems, call 302-739-9948.

Division of Water Licensing Program
302-739-9116 · DOWLicensing@delaware.gov

24 Hour Environmental Emergency Hotline:
800-662-8802

X

License Card

Licensee, please cut your license card out and keep with you at all times when conducting business under this license.

State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that
Devin Dupree

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 5805F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations
Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal
Systems Delaware Administrative Code 7101, Section 1.0.



Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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of the board, any condition of this license, or the provisions of the act under which the license is issued.

State of Delaware
Department of Natural Resources
and Environmental Control

This certifies that
Devín Dupree

has been issued a

On-Site Wastewater-Liquid Waste Hauler (Class F) License

License Number: 5805F

Issued: 01/01/2026

Expires: 12/31/2026



Signature of Licensee

Sarah Sives, Licensing Program Coordinator
DNREC Division of Water

This license issued by the Secretary of the Department of Natural Resources and Environmental Control pursuant to the authorities set forth in 7 Del C Ch. 60, Section 6023, Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101.

For questions related to small systems in:

New Castle County
call 302-739-9947

Kent County
call 302-739-9947

Sussex County
call 302-856-4561

For questions related to large systems, call 302-739-9948.

Division of Water Licensing Program
302-739-9116 · DOWLicensing@delaware.gov

24 Hour Environmental Emergency Hotline:
800-662-8802

X

License Card

Licensee, please cut your license card out and keep with you at all times when conducting business under this license.

State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that

jason gary


has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 5933F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations
Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal
Systems Delaware Administrative Code 7101, Section 1.0.





Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

This license may be revoked or suspended if the license holder violates any of the lawful rules or regulations of the board, any condition of this license, or the provisions of the act under which the license is issued.

State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that

Justin Hurley

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 5798F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations
Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal
Systems Delaware Administrative Code 7101, Section 1.0.



A handwritten signature in black ink, appearing to read "Sarah Silves".

Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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State of Delaware
Department of Natural Resources
and Environmental Control

This certifies that
Justin Hurley

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License

License Number: **5798F**

Issued: 01/01/2026

Expires: 12/31/2026



Signature of Licensee

Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

This license issued by the Secretary of the Department of Natural Resources and Environmental Control pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023, Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101.

For questions related to small systems in:

New Castle County
call 302-739-9947

Kent County
call 302-739-9947

Sussex County
call 302-856-4561

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State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that

Michael R Lynch

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 5802F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations
Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal
Systems Delaware Administrative Code 7101, Section 1.0.



Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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State of Delaware
Department of Natural Resources
and Environmental Control

This certifies that
Michael R Lynch


has been issued a

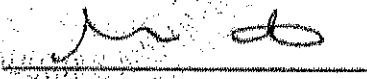
On-Site Wastewater Liquid Waste Hauler (Class F) License

License Number: **5802F**

Issued: 01/01/2026

Expires: 12/31/2026



Signature of Licensee

Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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800-662-8802

License Card

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X

State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that

Patrick McPhail

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 6212F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101, Section 1.0.



Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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State of Delaware
Department of Natural Resources
and Environmental Control

This certifies that

Patrick McPhail

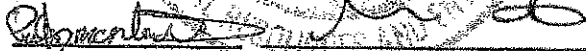
has been issued a

On-Site Wastewater Liquid Waste Hauler (Class E) License

License Number: **6212F**

Issued: **01/01/2026**

Expires: **12/31/2026**


Signature of Licensee Sarah Stives, Licensing Program Coordinator
DNREC Division of Water

This license issued by the Secretary of the Department of Natural Resources and Environmental Control pursuant to the authorities set forth in 7 Del. C. Ch. 60, Section 6023, Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101.

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Sussex County
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24 Hour Environmental Emergency Hotline:
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License Card

Licensee, please cut your license card out and keep with you at all times when conducting business under this license.

State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that
David Melvin

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 5799F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations
Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal
Systems Delaware Administrative Code 7101, Section 1.0.



Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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of the board, any condition of this license, or the provisions of the act under which the license is issued.

State of Delaware
Department of Natural Resources
and Environmental Control

This certifies that
David Melvin


has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License

License Number: **5799F**

Issued: 01/01/2026

Expires: 12/31/2026



Signature of Licensee

Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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License Card

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State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that
Richard Mosley Jr.

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 5801F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations
Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal
Systems Delaware Administrative Code 7101, Section 1.0.



Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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State of Delaware
Department of Natural Resources
and Environmental Control

This certifies that
Richard Mosley Jr.

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License

License Number: **5801F**

Issued: 01/01/2026

Expires: 12/31/2026

Signature of Licensee



Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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call 302-739-9947

Sussex County
call 302-856-4561

For questions related to large systems, call 302-739-9948.

Division of Water Licensing Program
302-739-9116 · DOWLicensing@delaware.gov

24 Hour Environmental Emergency Hotline:
800-662-8802

X

License Card

Licensee, please cut your license card out and keep with you at all times when conducting business under this license.

State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that

STEVEN A MULLINS

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License

License Number: 5803F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101, Section 1.0.



Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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State of Delaware
Department of Natural Resources
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This certifies that
STEVEN A MULLINS

has been issued a


On-Site Wastewater Liquid Waste Hauler (Class F) License

License Number: **5803F**

Issued: 01/01/2026

Expires: 12/31/2026


Signature of Licensee


Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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call 302-739-9947

Sussex County
call 302-856-4561

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Division of Water Licensing Program
302-739-9116 DOWLicensing@delaware.gov

24 Hour Environmental Emergency Hotline:
800-662-8802

X

License Card

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State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that

Phillip W Parsons

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 6206F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations
Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal
Systems Delaware Administrative Code 7101, Section 1.0.



A handwritten signature in black ink, appearing to read "Sarah Silves".

Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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State of Delaware
Department of Natural Resources
and Environmental Control

This certifies that
Phillip W Parsons

has been issued a
On-Site Wastewater Liquid Waste Handler (Class F) License
License Number: **6206F**

Issued: 01/01/2026

Expires: 12/31/2026



Signature of Licensee

Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

This license issued by the Secretary of the Department of Natural Resources and Environmental Control pursuant to the authorities set forth in 7 Del C Ch 60, Section 5023, Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101.

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Sussex County
call 302-856-4561

For questions related to large systems, call 302-739-9948.

Division of Water Licensing Program
302-739-9116 · DOWLicensing@delaware.gov

24 Hour Environmental Emergency Hotline:
800-642-8802

X

License Card

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State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that

Cordae A Showell

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 5960F

Valid from January 01, 2026 through December 31, 2026

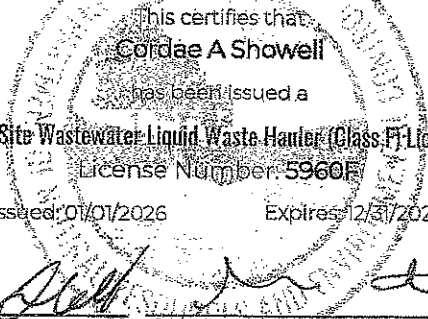
In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101, Section 1.0.



Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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State of Delaware
Department of Natural Resources
and Environmental Control



This certifies that
Cordae A Showell

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: **5960F**

Issued: 01/01/2026

Expires: 12/31/2026


Signature of Licensee Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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call 302-739-9947

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call 302-856-4561

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24 Hour Environmental Emergency Hotline:
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License Card

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State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that

Christopher A Wallace

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 6112F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101, Section 1.0.



Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that

Jesse Wallace Sr.

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 5814F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101, Section 1.0.



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State of Delaware
Department of Natural Resources
and Environmental Control

This certifies that
Jesse Wallace Sr.

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License

License Number: **5814F**

Issued: 01/01/2026

Expires: 12/31/2026


Signature of Licensee


Sarah Stives, Licensing Program Coordinator
DNREC Division of Water

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State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that

MARK WAMBOLD

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 6111F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7101, Section 1.0.



Sarah Silves, Licensing Program Coordinator
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State of Delaware
Department of Natural Resources
and Environmental Control

This certifies that
MARK WAMBOLD
has been issued a
On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: **611E**

Issued: 07/01/2026

Expires: 12/31/2026


Signature of Licensee


Sarah Stives, Licensing Program Coordinator
DNREC Division of Water

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call 302-739-9947

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call 302-856-4561

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State of Delaware
Department of Natural Resources and Environmental Control
Division of Water
89 Kings Highway, Dover, Delaware, 19901

This certifies that
Joshua White

has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: 6307F

Valid from January 01, 2026 through December 31, 2026

In the State of Delaware pursuant to the authorities set forth in 7 Del C Ch 60, Section 6023. Regulations
Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal
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Sarah Silves, Licensing Program Coordinator
DNREC Division of Water

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State of Delaware
Department of Natural Resources
and Environmental Control

This certifies that
Joshua White
has been issued a

On-Site Wastewater Liquid Waste Hauler (Class F) License
License Number: **6307F**

Issued: 01/01/2026

Expires: 12/31/2026



Signature of Licensee

Sarah Sives, Licensing Program Coordinator
DNREC Division of Water

This license issued by the Secretary of the Department of Natural Resources and Environmental Control pursuant to the authorities set forth in 7 Del. C. Ch. 60, Section 6023, Regulations Governing the Design, Installation and Operation of On-Site Wastewater Treatment and Disposal Systems Delaware Administrative Code 7103.

For questions related to small systems in:

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Kent County
call 302-739-9947

Sussex County
call 302-856-4561

For questions related to large systems, call 302-739-9948.

Division of Water Licensing Program
302-739-9116 · DOWLicensing@delaware.gov

24 Hour Environmental Emergency Hotline:
800-662-8802

X

License Card

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Cleaning of Vehicles

- All vehicles are to be cleaned at the plant
- Solid waste (biosolids) is to be swept up and put back in the biosolids area
- Liquid waste is to be washed into the storm water grating that goes back to the head of the plant for treatment.
- The area designated for truck cleaning is back by the vac-truck dump site as all storm water collected in that area goes to the head of the plant.

Record Keeping

- Each License holder is to have a book for record keeping of loads hauled
- Records consist of each load picked up and how much and where delivered (all septage comes to the plant at 139 Milford Neck Rd.)
- Biosolids loads have a weigh ticket from the plant and the location delivered.
- All biosolids loads are entered into the BARRS report at years end for DNREC.

Authorized Facility

- The only authorized facility for liquid septage is the plant at 139 Milford Neck Rd.
- Authorized biosolids delivery sites are fields with Nutrient Management plans.

Permits

- Distribution and Marketing permit -State Permit Number: DM 2401-K-03
- Agricultural Utilization Permit-State Permit Number: AGU
2104/2401-K-03

Sludge Generated

- All biosolids are generated at Kent County Regional Resource Recovery Facility 139 Milford Neck Rd. Milford, De 19963
- All biosolids is a Class A EQ sludge
 - 1) Lime stabilization
 - 2) Heat treatment
- Typical generation is 10,000 tons per year but can vary

Hours of Operation

- The facility operates 24/7/365 for liquid septage
- The biosolids delivery is Monday through Friday 7:00 am to 3:30 pm except for national holidays
- Kent County Wastewater Treatment Facility is the generating facility and disposal facility

Spill Reporting and clean-up

- Stop spill
- Mobilize equipment and personnel for clean up, including recovering spilled material, remediation of soil, and lime of affected areas
- Any spill over 25 gallons will be documented and reported to the GWDS as required

State Permit Number: AGU 2401-K-03

Effective Date: December 1, 2024

Expiration Date: November 30, 2029



AUTHORIZATION TO OPERATE A LAND TREATMENT SYSTEM

FOR THE

AGRICULTURAL UTILIZATION OF SLUDGE

Pursuant to the provisions of 7 Del. C., §6003

Kent County Levy Court
555 Bay Road
Dover, Delaware 19901

is hereby granted a permit to operate land treatment systems for the agricultural utilization of Class B sludge from the Kent County Regional Resource Recovery Facility and Class B sludge from other locations as approved by the Department in writing. This permit is limited to the application of Department approved sludges and/or wastes at agronomic rates to the site designated in this permit.

Should Class A sludge from the Kent County Wastewater Treatment Facility be utilized on the on the land application sites listed in this permit, the Class A sludge shall be prepared and applied in accordance with State Distribution and Marketing (DM) Permit Number DM 2402-K-03 (as amended), Part III, B. of the Department of Natural Resources and Environmental Control's (Department) Guidance and Regulations Governing the Land Treatment of Wastes, the Kentorganite Class A Biosolids Fertilizer Product label, and in accordance with any applicable requirements in this permit.

The application rates, monitoring requirements and other permit conditions are set forth in Parts I, II and III hereof.

Gordon Woodrow, Program Manager
Commercial and Government Services
Division of Water
Department of Natural Resources
and Environmental Control

11-20-2024

Date Signed

Part I

A. GENERAL DESCRIPTION OF OPERATION

The operation involves the land application of Department approved Class B stabilized sludge onto any of the site locations listed below. Class A sludge generated at the Kent County Regional Resource Recovery Facility may also be land applied to site locations listed in this permit. Sludge shall be delivered to the sites in accordance with a valid Delaware Waste Transporters Permit where it will be land applied at agronomic rates.

Sludge stabilization of Class B sludge shall be achieved by an approved alternative found in Part III, (B), Section 133 and 134 of the Guidance and Regulations Governing The Land Treatment of Wastes and Title 40 Code of Federal Regulations, Part 503, Standards for the Use or Disposal of Sewage Sludge.

B. SITE LOCATIONS

1. Kent County Sludge Farm (KSF 1) Site Description:

The site consists of two parcels of containing approximately 130 acres of which approximately 58 acres are suitable for land application, located on the northeast side of the Kent County Wastewater Treatment Facility, approximately 2 miles east of Frederica.

Tax parcel number: 5-00-14200-01-5500 and 5-00-14200-01-2000



Note: Refer to land application map in the November 2014 Project Development Report (PDR) for specific land application area and exclusion areas.

2. The Blessing Farm (KSF4) Site Description:

The Blessing Farm consists of 150 acres of which approximately 107 are suitable for land application, located 1 mile north of Houston, on the east side of County Road # 384 (Killens Pond Road), approximately 0.15 miles north of Delaware Route 14.

Tax parcel numbers: 5-00-17200-01-6900 and 5-00-17200-01-3300



Note: Refer to land application map in the November 2014 PDR for specific land application area and exclusion areas.

3. The Goldinger Farm (KSF5) Site Description:

The site consists of one parcel consisting of 243 acres of which approximately 145 acres are suitable for land application, located on the southeast side of Kent County Road # 84 (Twin Willows Road) 4 miles southeast of Smyrna.

Tax parcel number: 1-00-03800-01-0200



Note: Refer to land application map in the November 2014 PDR for specific land application area and exclusion areas.

4. **The West Farm (fields 41B, 41C, and 41D) Site Description:**

The site consists of one parcel consisting of approximately 216 acres of which approximately 30 acres are suitable for land application, located on the east side of Kent County Road # 1 (Bay Road) less than 1 mile southeast of Frederica.

Tax parcel number: 5-08-14100-01-0100



Note: Refer to land application map in Exhibit V-4 sheet 1 of the November 2014 PDR for specific land application area, seasonally restricted areas and exclusion areas. Refer to Exhibit V-4 sheet 1 for land application acreages for fields 41-B, 41-C, and 41-D. Fields 41-B, 41-C, and 41-D shall be flagged using GPS points from Exhibit V-4 sheet 1 prior to land application. **Field 41-A is NOT permitted for biosolids application under this permit.** Monitoring well locations in the above map are approximate.

5. The West Farm (fields 53D and 53 E) Site Description:

The site consists of one parcel consisting of approximately 170 acres of which approximately 38 acres are suitable for land application. Located on the east side of Kent County Road # 1 (Bay Road) approximately 1 mile southeast of Frederica and immediately to the northwest of the Wastewater Treatment Plant.

Tax parcel number: 5-00-14100-01-0300



Note: Refer to land application map in Exhibit V-4 sheet 2 of the November 2014 PDR for specific land application area, seasonally restricted areas and exclusion areas. Refer to Exhibit V-4 sheet 2 for land application acreages for fields 53 D and 53-E. Fields shall be flagged using GPS points from Exhibit V-4 sheet 1 prior to land application. Monitoring well locations in the above map are approximate.

C. REGULATORY AND SUPPORTING DOCUMENTS:

The land treatment operations shall be conducted in accordance with the following documents:

1. The Department of Natural Resources and Environmental Control's Guidance and Regulations Governing the Land Treatment of Wastes, Part III, (B); (October 1999 Revision);
2. Title 40 of the Code of Federal Regulations Part 503, Standards for The Use and Disposal of Sewage Sludge, Final rule dated February 19, 1993;
3. The November 28, 2023 permit application.
4. The Kent County Sludge Farm (Field KSF-1) letter of intent dated February 15, 1989; and,
5. The Kent County Sludge Farm (Field KSF-1) revised Project Development Report dated February 2014.
6. The Blessing Farm letter of intent dated December 27, 1990; and,
7. The revised Blessing Farm project development report dated February 2014.
8. The Goldinger Farm letter of intent dated July 8, 1992; and,
9. The revised Goldinger Farm project development report dated February 2014.
10. The West Farm letter of intent dated February 11, 2014; and,
11. The West Farm project development report dated January 2014.
12. The request to renew State Permit Number AGU 1901-K-03 dated November 28, 2023.

D. SLUDGE APPLICATION LIMITATIONS

1. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to operate land treatment sites as identified on pages 3 through 7 of this permit for the application of stabilized sludge at agronomic rates. The timing of sludge application to the site, as well as the quantity and quality of sludge to be land applied shall be specified in a Nutrient Management Plan (NMP) and in accordance with the limitations below.
2. Sludge shall be applied at agronomic rates established for the subsequent cropping plan. Mineralized nitrogen from prior application must be considered in calculating nitrogen application rates.
3. Sludge shall be applied at a rate to meet, but not exceed, the Plant Available Nitrogen (PAN) requirement for the crop(s) grown. All nutrient application rates shall be determined by a Delaware Certified Nutrient Consultant. Estimated crop nutrient uptake requirements shall be based on University of Delaware Cooperative Extension Service crop fertility recommendations and based upon realistic crop yields. The Department may approve alternate fertility recommendations should University of Delaware Cooperative Extension Service crop fertility recommendations not be available for the planned crop rotation. PAN calculations shall also include any residual mineralized nitrogen from previous sludge application. The cropping plan and the nutrient requirement for the crop(s) shall be submitted to the Department for review and approval, prior to the commencement of sludge application activities.
4. Supplemental additions of fertilizers (i.e., commercial fertilizer, manure, Class A biosolids, etc.) shall be limited to amounts necessary to meet crop needs using the written recommendations of a Delaware Certified Nutrient Consultant for the specified crop and anticipated yield.
5. Fields with "high" phosphorus soil levels as defined by Title 3, Chapter 22 of the Delaware Code (the Nutrient Management Law) and the Delaware Nutrient Management Commission shall be in compliance with a current Nutrient Management Plan and phosphorus management requirements in the Nutrient Management Law. Utilization of the phosphorous site index (PSI) and phosphorus management strategies, as recommended by the University of Delaware Cooperative Extension, may also be utilized to comply with the Nutrient Management Law.
6. For any portions of the sludge application area where the depth to seasonal high-water table is less than 20 inches but greater than 12 inches, application is limited to May, June July or August. Sludge shall only be applied when the actual water table depth is at least 20 inches below the maximum depth of tillage as defined in Part I, G. 3 and pursuant to Part III, (B), Subsection 138.6 of the Guidance and Regulations Governing the Land Treatment of Wastes.

7. The depth to water of all observation wells and/or monitoring wells (where applicable) surrounding application fields must be monitored and the results recorded, before land application begins each calendar year. Groundwater level measurements shall continue monthly until land application activities cease. The frequency of water-level monitoring, during application activities, must increase to weekly in any monitoring well containing a depth to water reading that is within 3 feet of the ground surface. The Department may also require hand auger borings to confirm depth to groundwater prior to the application of Class B biosolids.
8. Should water-level readings indicate that areas of the sludge field have or likely have a water table that is within 20 inches of the ground surface, sludge application in these areas must cease immediately and be discontinued until the limiting situation has passed.
9. Only sludge, which has been treated to Process to Significantly Reduce Pathogens (PSRP) or Process to Further Reduce Pathogen (PFRP) requirements, as defined in Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes, shall be applied to any of the land treatment sites in this permit.
10. A sufficient amount of lime to adjust the soil pH to a value of 6.2 or above shall be applied to the site prior to sludge application. If lime stabilized sludge is to be utilized for land application, a sufficient amount of lime stabilized sludge shall be added to the application site to raise the pH to 6.2 or above at the time of application.
11. Sludge may not be applied when the ground is frozen, saturated or covered with snow or during periods of rain or runoff. Sludge may not be applied from December 7 through February 15 unless the permittee receives written approval from the Department to land apply sludge during this period.
12. The sludge shall be applied so that the application is uniform.
13. Fields that receive land application of sludge must have appropriate vegetation established and harvested during the growing season(s) to receive nutrient uptake credit. Fields must be planted with appropriate vegetation or a cover crop within one (1) month of completing sludge application, unless prohibited by weather conditions in which case vegetation must be established as soon as practicable.
14. Liquid sludge shall only be applied by means of subsurface injection into the soil. Solid Sludge (> 20% solids) may be surface applied. The permittee shall ensure that the sludge is incorporated into the soil within 6 hours of surface application.
15. At minimum, crop harvest restrictions in Part III, (B), Section 138.3 of the Guidance and Regulations Governing the Land Treatment of Wastes, shall be implemented.
16. Public access to the sludge application area must be restricted for at least

twelve (12) months after sludge application, unless sludge has been treated by an approved process to further reduce pathogens (PFRP).

17. Buffer zones established pursuant to Part III, (B), Subsection 138.2 of the Guidance and Regulations Governing the Land Treatment of Wastes shall be maintained at all times during sludge application. A minimum buffer of 33 feet for injection and 50 feet for surface application shall be maintained from streams, tidal waters, or other water bodies. During the “Pre Start Up” inspection as required in Part III, 6., of this permit, the Department may require increased buffer zones as allowed in Section 138.2.2 of Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes. Considerations for buffer extensions may include adjacent land use, type of sludge, sludge application method, sludge application rate, sludge quality and level of treatment, land slopes, vegetative cover used the nature of surrounding bodies of water and any other factors considered relevant by the Department.
18. No sludge shall be applied if sample analysis yields pollutant concentrations in excess of the following values:

Arsenic	75 mg/kg	Cadmium	85 mg/kg	Chromium	3000 mg/kg
Copper	4300 mg/kg	Lead	840 mg/kg	Mercury	57 mg/kg
Molybdenum	75 mg/kg	Nickel	420 mg/kg	Selenium	100 mg/kg
Zinc	7500 mg/kg	PCB	3 mg/kg		

E. GROUNDWATER LIMITATIONS

Application of sludge to the designated fields shall not cause groundwater to be in violation of applicable Federal or State drinking water standards on an average annual basis. If down-gradient water supply wells (public or private) are impacted above applicable Federal or State drinking water standards from the land application of sludge, the permittee shall be required to provide a free Department approved alternative potable water supply to the affected parties.

F. MONITORING REQUIREMENTS

During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to apply stabilized sludge at agronomic rates to the sludge application sites found in Part I, of this permit. Such applications shall be monitored by the permittee as specified below:

1. STABILIZED SLUDGE

a. During periods when sludge is not land applied and is prepared in accordance with State Permit Number DM 2402-K-03 (as amended) and given away or sold in bulk, the monitoring and reporting requirements of that permit will fulfill the monitoring and reporting requirements of Part J.1 of this permit.

b. When sludge is prepared for land application for application at any site approved in this permit, monitoring is required as specified below:

Parameter	Unit Measurement	Minimum Frequency	Sample Type
Moisture Content	percent	Monthly*	Composite
Total Nitrogen as N (Moist & Dried)	percent	Monthly*	Composite
Organic Nitrogen as N (Moist & Dried)	percent	Monthly*	Composite
Ammonium and Nitrate Nitrogen as N (Moist & Dried)	percent	Monthly*	Composite
pH	S.U.	Monthly*	Composite
Volatile Solids	percent	Monthly*	Composite
Phosphorus as P (dry weight basis)	percent	Monthly*	Composite
Potassium (dry weight basis)	percent	Monthly*	Composite
Aluminum (dry weight basis)	mg/kg	Monthly*	Composite
Arsenic (dry weight basis)	mg/kg	Monthly*	Composite
Cadmium (dry weight basis)	mg/kg	Monthly*	Composite
Chlorides (dry weight basis)	mg/kg	Monthly*	Composite
Chromium (dry weight basis)	mg/kg	Monthly*	Composite
Copper (dry weight basis)	mg/kg	Monthly*	Composite
Lead (dry weight basis)	mg/kg	Monthly*	Composite
Mercury (dry weight basis)	mg/kg	Monthly*	Composite
Molybdenum (dry weight basis)	mg/kg	Monthly*	Composite
Nickel (dry weight basis)	mg/kg	Monthly*	Composite
Selenium (dry weight basis)	mg/kg	Monthly*	Composite
Sodium (dry weight basis)	mg/kg	Monthly*	Composite
Zinc (dry weight basis)	mg/kg	Monthly*	Composite
Fecal Coliform (MPN dry wt. basis)	colonies/g	Monthly*	Composite
PCB's (dry weight basis)	mg/kg	Monthly*	Composite
Priority Pollutant Scan	-----	Every 3 years*	Composite

Sludge samples shall be collected at the following location: the sludge cake storage area or the sludge storage lagoons. All sludge samples shall be taken and analyzed in accordance with Section 151 of the Department's Guidance and Regulations Governing the Land Treatment of Wastes. See Part I J. for reporting frequencies.

* For sludge lagoons, the minimum frequency of sampling shall be determined by a Department approved sampling plan.

See Part I, I.1. for reporting requirements. After notice and opportunity for a hearing, the Department may modify the list of parameters required to be monitored and/or the frequency of monitoring.

2. SLUDGE STABILIZATION PROCESS MONITORING

All Class B sludge prepared for land application at the sites approved in this permit must meet one of the alternatives listed in Part III, Section 133.1.1 of the Guidance and Regulations Governing the Land Treatment of Wastes. The permittee shall be exempt from the sludge stabilization process monitoring requirements of this permit for Class B Kent County Wastewater Treatment Plant sludge if the stabilization process monitoring of sludge generated is conducted as required in State Permit Number DM 2402-K-03 (as amended) or if sludge is disposed of in a landfill. Any new or different stabilization process shall be monitored in accordance with the Guidance and Regulations Governing the Land Treatment of Wastes. See Part I, J. for reporting requirements.

3. VECTOR ATTRACTION REDUCTION

Vector attraction reduction must be achieved by pH adjustment, “pH of sewage sludge shall be raised to 12 or higher by alkaline addition and, without the addition of more alkali shall remain at 12 or higher for two hours and then at 11.5 or higher for an additional 22 hours” or other alternative method for achieving vector attraction reduction found in Subsection 135 of Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes, may be employed with prior Department approval.

4. SOIL MONITORING

Soil monitoring shall commence at least thirty (30) days prior to land application at the locations and frequency outlined below. A copy of all soil monitoring results required by this permit shall be submitted to the Department in accordance with Part I, J.2 of this permit.

Parameter	Unit Measurement	Minimum Frequency	Sample Type
pH	S.U.	Annually	Composite
Phosphorus as P (dry weight basis)	mg/kg	Annually	Composite
Potassium (dry weight basis)	mg/kg	Annually	Composite
% Organic Matter	percent	Annually	Composite
Arsenic (dry weight basis)	mg/kg	*	Composite
Cadmium (dry weight basis)	mg/kg	*	Composite
Copper (dry weight basis)	mg/kg	*	Composite
Chromium (dry weight basis)	mg/kg	*	Composite
Lead (dry weight basis)	mg/kg	*	Composite
Mercury (dry weight basis)	mg/kg	*	Composite
Molybdenum (dry weight basis)	mg/kg	*	Composite
Nickel (dry weight basis)	mg/kg	*	Composite
Selenium (dry weight basis)	mg/kg	*	Composite
Zinc (dry weight basis)	mg/kg	*	Composite
Aluminum (dry weight basis)	mg/kg	Annually	Composite
Magnesium (dry soil basis)	mg/kg	Annually	Composite
Manganese (dry soil basis)	mg/kg	Annually	Composite
Iron (dry weight basis)	mg/kg	Annually	Composite
Sodium (dry soil basis)	mg/kg	Annually	Composite
% Organic Matter	Percent	Annually	Composite

NOTE: Composite soil samples representing each soil series identified within each sludge application area shall be collected in accordance with the Kent County Sludge Management Manual. Soil chemistry testing must be in accordance with the Methods of Soil Analysis published by the American Society of Agronomy, and in accordance with Part III, (B), Section 151 of the Department's Guidance and Regulations Governing the Land Treatment of Wastes. See Part I, J.1. for reporting requirements.

* If Class B sludge is applied during the effective period of this permit, the parameters above marked with a * shall be monitored at least once (for any field(s) utilized) during the effective period of this permit. Parameters marked with a * are not required to be sampled if only "Class A" "EQ" sludge is applied during the effective period of this permit.

After notice and opportunity for a hearing, the Department may modify the list of parameters required to be monitored and/or the frequency of monitoring.

5. PLANT TISSUE AND GRAIN ANALYSIS

None is required at this time.

6. GROUNDWATER MONITORING (Kent County Sludge Farm (KSF-1) and West Farm)

Parameter	Unit Measurement	Minimum Frequency	Sample Type
Depth to Water	hundredths of a foot	Annually	In-Situ
Dissolved Oxygen	mg/l	Annually	Field Test
pH	S.U.	Annually	Field Test
Specific Conductivity	UMHOS/CM	Annually	Field Test
Temperature	°C	Annually	Field Test
Ammonium as N	mg/l	Annually	Grab
Nitrate Nitrogen as N	mg/l	Annually	Grab
Total Nitrogen as N	mg/l	Annually	Grab
Total Phosphorus	mg/l	Annually	Grab
Total Dissolved Solids	mg/l	Annually	Grab
Chloride	mg/l	Annually	Grab
Sodium	mg/l	Annually	Grab
Arsenic, Total	mg/l	*	Grab
Cadmium, Total	mg/l	*	Grab
Chromium, Total	mg/l	*	Grab
Copper, Total	mg/l	*	Grab
Lead, Total	mg/l	*	Grab
Molybdenum, Total	mg/l	*	Grab
Mercury, Total	mg/l	*	Grab
Nickel, Total	mg/l	*	Grab
Selenium, Total	mg/l	*	Grab
Zinc, Total	mg/l	*	Grab
Fecal Coliform	Colonies/100ml	*	Grab

- a. At the West Farm, groundwater samples shall be collected and analyzed individually from monitoring wells 4 (242095), 7 (242091), 8 (242533), 9 (242532), A (256989), and B (256990). Additionally, wells KC2, KC3, KC4, and KC8 at the Kent County Sludge Farm shall also be sampled. All groundwater samples shall be collected in compliance with the monitoring requirements specified above and shall be collected at each monitoring well in accordance with procedures approved by the Department and listed in the Department's Field Manual for Groundwater Sampling (March, 1988). A request to suspend groundwater monitoring may be made when sludge has not been applied for three or more consecutive years.
- b. Groundwater monitoring results for each monitoring well shall be reported using the State of Delaware Well Identification Tag Number that is required on all wells in accordance with the Delaware Regulations Governing the Construction and use of Wells, Section 10, A.
- c. After notice and opportunity for a hearing, the Department may modify the list of parameters required to be monitored and/or the frequency of monitoring.
- d. If sludge has not been applied for three (3) or more years, the permittee may request suspending groundwater monitoring at the corresponding farm(s).
- e. If sludge is applied during the effective period of this permit, the parameters above marked * shall be monitored at least once during the effective period of this permit from wells KC2, KC3, KC4, and KC8 at the Kent County Sludge Farm and/or wells 4 (242095), 7 (242091), 8 (242533) and 9 (242532) at the West Farm.

7. OTHER MONITORING AS REQUIRED BY THE DEPARTMENT

The Permittee shall perform additional monitoring of effluent, groundwater, soils, and/or surface water upon Department notification. Monitoring requirements may include increased sampling frequency, additional sampling parameters/contaminants, and/or additional monitoring locations (including additional wells) to assure the protection of human health and/or water resources. Analytical results from additional monitoring shall be submitted in monthly reports unless the Department requires an alternative submission schedule.

G. SCHEDULE OF COMPLIANCE

1. Should the Blessing Farm or Goldinger Farm be utilized for sludge application more than once during the effective period of this permit, a network of monitoring wells shall be installed in accordance with the following requirements for the applicable farm(s):

Within one hundred eighty (180) days of utilizing the applicable farm(s) for the second time during the effective period of this permit, Kent County shall submit a plan completed by, or under the supervision of, a Delaware-licensed professional geologist (PG), or a professional engineer qualified in hydrology and licensed to practice in the State of Delaware for review and approval. The plan shall include the proposed location and construction details of a network of groundwater monitoring wells sufficient to characterize groundwater beneath each agricultural utilization farm. Within one hundred eighty (180) days of DNREC approval of the plan, all groundwater monitoring wells shall be installed, surveyed and sampled for the parameters listed in Part I, F.6 of this permit. Sample frequency shall comply with Part 1, F.6 of this permit after initial sampling.

H. BONDING

1. Not Required

I. MONITORING

1. Representative Sampling:

Samples and measurements taken as required herein shall be representative of the volume and nature of the sludge to be land applied.

2. Recording of Results:

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact place, date and time of sampling and/or measurement;
- b. The person(s) who performed the sampling and/or measurement;

- c. The dates and times the analyses were performed;
 - d. The person(s) who performed the analyses;
 - e. The results of each analysis.
3. Records Retention:

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recording from continuous monitoring instrumentation shall be retained for five (5) years. This period of retention shall be extended automatically during the course of any unresolved litigation regarding the regulated activity or regarding control standards applicable to the permittee, or as requested by the Department.

J. REPORTING

1. The permittee shall submit to the Department and landowners an annual operation report on or before February 1 of each year for the previous calendar year. The annual report shall be in a format acceptable to the Department. The annual operation report shall include the following:
 - a. If no sludge is applied, the annual operation report shall consist of a letter to the Department by the permittee stating that no land application of sludge occurred in the previous calendar year and include information required in d., h., and i. below.
 - b. The daily operational record (as specified in Part II, A.1);
 - c. The weight (wet and dry tons) and volume of sludge utilized at the land application site;
 - d. Any changes in ownership of the land where the operation is conducted or any change in any lease agreement for the use of such land that may affect or alter the operator's rights upon such land;
 - e. A chemical analysis of soil from each field for the constituents identified in Part I, F.4. The results shall be compared to the corresponding soils data submitted as a part of the Project Development Reports. The procedure for soil analysis shall be consistent with Department guidance;
 - f. Groundwater analysis from monitoring wells for the constituents identified in Part I, F.6.
 - g. Site maps of the same scale and contour interval as the maps submitted with the Project Development Reports, showing the boundaries within each field where sludge has been applied during the previous year;
 - h. For each site: the cropping scheme followed during the previous year and

anticipated for the coming year; crop yield data and an explanation of which portions of the plants were harvested; results of plant tissue and grain analyses, if required; Identification of fields to be used during the coming year; sludge application rates for the coming year based on nitrogen mineralization calculations from previous sludge application practices;

i Any other information required by the Department.

2. Sludge analytical and stabilization process monitoring data obtained during the previous period shall be summarized for each period and submitted no later than the 28th day of the month following the completed reporting period. Signed copies of these, and all other reports required herein, shall be electronically submitted to the Department to biosolids_de@delaware.gov.

If more than one sample is analyzed during any month, a table showing the range of constituent concentration values shall be prepared and included with the submittal. Monthly reports may be submitted electronically or in any format specified by the Department.

When submitting monitoring results, copies of the original laboratory sheets should be included. If more than one sample is analyzed during any month, a table showing the range of constituent concentration values shall be prepared and included with the submittal.

3. The permittee shall submit copies of all monitoring results required in condition J.2 above to the landowner of each site.
4. The permittee shall maintain monthly sludge inventory data. This data shall include at a minimum (a) the quantity of sludge generated, (b) quantity of sludge stored on site, and (c) quantity of sludge transported off site. Transportation records shall include the date, quantity, carrier used, and the final destination of each shipment. The inventory data shall be maintained at the facility and be made available to the Department in accordance with Part I, I.3 of this permit.
5. Test Procedures

Test procedures for all analyses shall conform to the applicable test procedures identified in Part III, (B), Section 151 of the Department's Guidance and Regulations Governing the Land Treatment of Wastes, unless otherwise specified in this permit.

K. DEFINITIONS

1. "Agricultural Utilization" means the application rate of wastes or sludge or sludge products which shall not exceed the nutrient needs of the crop grown on the particular soil plus the other assimilative pathways in soils (e.g. immobilization with organic material, volatilization, and leachate in compliance with drinking water standards). This term may be used interchangeably with "agronomic rate".
2. "Composite" means a series of grab samples which have been collected in a manner such that the final sample is representative of the volume and characteristics of the material to be analyzed.
3. "Depth of Tillage" means the maximum depth at which sludge can be found after injection or incorporation into the soil.
4. "Feed crops" are crops produced primarily for consumption by animals.
5. "Fiber crops" are crops such as flax, cotton, and hemp.
6. "Food crops" are crops consumed by humans. These include, but are not limited to, fruits, vegetables, and tobacco.
7. "Land application" means the placement of sludge, treated sludge, or any other product containing these materials within 2 feet below the surface of land used to support vegetative growth.
8. "PFRP" means Process to Further Reduce Pathogens.
9. "PSRP" means Process to Significantly Reduce Pathogens.
10. "Sewage" means water-carried human or animal wastes from septic tanks, water closets, residences, buildings, industrial establishments, or other places, together with such groundwater infiltration, subsurface water, admixture of industrial wastes or other wastes as may be present.
11. "Sewage sludge" means sludge which derives in whole or in part from sewage.
12. "Sludge" means the accumulated semi-liquid suspension, settled solids, or dried residue of these solids that is deposited from (a) liquid waste in a municipal or industrial wastewater treatment plant, (b) surface or ground water treated in a water treatment plant, whether or not these solids have undergone treatment. Septage is included herein as sludge.
13. "Treatment" means a process which alters modifies or changes the biological, physical, or chemical characteristics of sludge or liquid waste.
14. "Vector Attraction" is the characteristic of sewage sludge that attracts rodent, flies, mosquitoes, or other organisms capable of transporting infectious agents.

Part II

A. MANAGEMENT REQUIREMENTS

1. Land Application of Sludge

The permittee shall prepare and maintain an operational record for each day that sludge is applied and when any other management activities are conducted at the land application sites. The daily operational record shall include the following:

- a. The date, type, and wet and dry weights of the sludge applied;
- b. The facility from which the sludge originated;
- c. A record of any major deviations from the operating plan;
- d. General daily weather conditions;
- e. The application rate for sludge;
- f. A map for each site showing the area of daily activity;
- g. A record of all actions taken to correct violations of the Delaware Environmental Protection Act and the Department's Regulations; and,
- h. Management undertaken, such as planting and harvesting of crops, fertilizers and chemicals added, irrigation frequency, techniques used, etc.

2. Change in Operation

The application of sludge to the sites authorized herein shall be consistent with the terms and conditions of this permit. The application of sludge at levels in excess of the amount necessary to provide plant available nitrogen for the crop being grown, in accordance with the limits identified in Part I, D.1, 2, and 3 of this permit, shall constitute a violation of the permit. Any anticipated facility expansion, production increase, or change in site conditions which would affect the land limiting constituent, create a new land limiting constituent, or adversely affect site conditions must be reported to the Department. Upon review of this information, the Department may invoke the provisions of Part II, B.6 of this permit.

3. Noncompliance Notification

The permittee shall report to the Department at biosolids_de@delaware.gov:

- a. In writing thirty (30) days before any planned physical alteration or addition to the permitted facilities or activities, if that alteration or addition would result in any significant change in information that was submitted during the permit application process;

- b. In writing thirty (30) days before any anticipated change which would result in noncompliance with any permit condition or Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes;
- c. Orally within twenty-four (24) hours from the time the permittee became aware of any noncompliance which may endanger the public health or the environment, at (800) 662-8802. In addition, a call must be placed at (302) 739-9946 during normal business hours, and;
- d. In writing as soon as possible but within five (5) days of the date the permittee knows or should know of any noncompliance unless extended by the Department;

This report shall contain:

- 1) A description of the noncompliance and its cause;
 - 2) The period of noncompliance including to the extent possible, times and dates and, if the noncompliance has not been corrected, the anticipated time it is expected to continue; and
 - 3) Steps taken or planned to reduce or eliminate reoccurrence of the noncompliance.
- e. In writing as soon as possible after the permittee becomes aware of relevant facts not submitted or incorrect information submitted, in a permit application or any report to the Department. Those facts or the correct information shall be included as a part of this report.
4. Minimize Impacts

The permittee shall take all necessary actions to eliminate and correct any adverse impact on the public health or the environment resulting from permit noncompliance.

B. RESPONSIBILITIES

1. Renewal Responsibilities

At least one hundred eighty (180) days before the expiration date of this permit, the permittee shall submit a new application for a permit or notify the Department of the intent to cease operation by the expiration date. In the event that a timely and sufficient reapplication has been submitted and the Department is unable, through no fault of the permittee, to issue a new permit before the expiration date of this permit, the terms and conditions of this permit are automatically continued and remain fully effective and enforceable.

2. Entry and Access

The permittee shall allow the Department, consistent with 7 Del. C., Chapter 60, to:

- a. Enter the permitted facilities;
- b. Inspect any records that must be kept under this permit;
- c. Inspect any facility, equipment, practice, or operation permitted or required by this permit;
- d. Sample or monitor for the purpose of assuring permit compliance, any substance or any parameter at the facility or land application site.

3. Provide Information

The permittee shall furnish to the Department within a reasonable time, any information requested, including copies of records, which may be used by the Department to determine whether cause exists for modifying, revoking, reissuing, or terminating the permit, or to determine compliance with the permit or Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes.

4. Transfer of Ownership or Control

This permit shall be transferable to a new owner or operator provided that the permittee notifies the Department by requesting a minor modification of the permit before the date of transfer and provided that the transferee shows evidence of a legal right to use the site and is otherwise in compliance with all applicable provisions of Part III, (B), of the Department's Guidance and Regulations Governing the Land Treatment of Wastes.

5. Operation of Facility

The permittee shall at all times properly maintain and operate all structures, systems, and equipment for treatment, control and monitoring, which are installed or used by the permittee to achieve compliance with this permit or Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes.

6. Permit Revocation and Modification

- a. After notice and opportunity for a hearing, this permit may be modified or revoked in whole or in part during its term for cause including, but not

limited to, the following:

- 1) Violation of any terms or conditions of this permit;
- 2) Obtaining this permit by misrepresentation or failure to disclose fully all of the relevant facts;

- 3) Any change in operating conditions that requires either a temporary or permanent permit modification; or
 - 4) If the Department finds that the public health, safety or welfare requires emergency action, the Department shall incorporate findings in support of such action in a written notice of emergency revocation issued to the permittee. Emergency revocation shall be effective upon receipt by the permittee. Thereafter, if requested by the permittee in writing, the Department shall provide the permittee a revocation hearing and prior notice thereof. Such hearings shall be conducted in accordance with 7 Del. C., Chapter 60.
- b. The Department may revoke this permit if the permittee violates any permit condition, any provisions of Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes, or fails to pay applicable Department fees.

7. Permit Closure Report

- a. All land approved for the Agricultural Utilization of sludge is required to have a closure report when the land is no longer being utilized as described in permit application. The report must be submitted to the Department within four (4) months of determination that the field will no longer be utilized for sludge application. The closure report will have the following:
- 1) Letter from permittee stating the application site (with tax parcel number(s)) will no longer receive sludge approved by this Permit.
 - 2) A copy of the last sludge monitoring results as required in Part 1, F.1 of this permit.
 - 3) A copy of the last soil monitoring results as required in Part 1, F.4 of this permit. A soil test is required after the last land application of sludge.
 - 4) The intended date to cease operations and proposed future use of each tax parcel listed in this permit.
 - 5) The Permittee must continue monitoring all groundwater monitoring wells in accordance with this permit and may not close or abandon any wells until authorized in writing by the Department. The Department will require groundwater monitoring results from after the final land application event (if monitoring was previously required).
 - 6) Prior to closure of this permit, the Department may require additional monitoring of soil and/or groundwater for emerging contaminants that are found or are likely to be present in sludge previously applied under this permit.

8. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under 7 Del. C., Chapter 60.

9. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

11. Severability

If any provision of this permit is held invalid, the remainder of this permit shall not be affected. If the application of any provision of this permit to any circumstance is held invalid, its application to other circumstances shall not be affected.

12. Compliance Required

The permittee shall comply with all conditions of the permit.

13. Reopener

In the event that the Part III, B, of the Guidance and Regulations Governing the Land Treatment of Wastes applicable Federal Regulations are revised, this permit may be reopened and modified accordingly after notice and opportunity for a public hearing.

Part III

A. SPECIAL CONDITIONS

The permittee must ensure that the following conditions are met:

1. Monitoring wells
 - a. Groundwater shall be sampled at the following locations at the frequencies indicated.
 - 1) Groundwater shall be sampled per the frequency listed in Part I, Subsection B.6. of this permit at the West Farm in monitoring wells 4 (242095), 7 (242091), 8 (242533), 9 (242532), A (256989), and B (256990) and at the Kent County Sludge Farm (KSF-1) monitoring wells KC2, KC3, KC4, and KC8.
 - b. All monitoring wells samples shall be analyzed for the parameters listed in Part I, Subsection F.6.
 - c. Copies of the laboratory reports for all groundwater analytical data and the corresponding sampling logs shall be submitted to the Department within thirty days of receipt of the analytical data. In addition, the elevation of the top of the casing (TOC) for each monitoring well shall be surveyed in reference to a permanently marked, stationary point. After notice and opportunity for a hearing, the Department may modify the list of parameters specified above based on observations of groundwater quality trends in the area.
 - d. The monitoring frequency for groundwater will be increased to semi-annually at any of the above sites, when sludge is applied.
2. Only sludge meeting the requirements for stabilization and that has been processed to significantly reduce pathogens, by methods approved by the Department and as specified in this permit, may be land applied.
3. Sludge shall be transported to the land treatment sites in accordance with Delaware Non Hazardous Waste Transporters Permit No. OH-11.
4. Supersedes Previous Permit

This permit supersedes the State Permit No. AGU 1901-K-03, effective June 1, 2019.
5. Pre-Start Up
 - a. Prior to the application of sludge, buffer zones and the areas on which sludge is to be applied must be clearly marked with stakes or other suitable

markers acceptable to the Department.

- b. The permittee must notify the Department at (302) 739-9946 at least two (2) working days prior to the application of sludge to any field.
- c. Before the permittee can begin to apply sludge to the designated site, a pre start-up inspection may be conducted by the Department to verify that proper buffer zones and non-application areas are suitably marked. Based on the results of the pre start-up inspection, the Department will either:
 - 1) Grant approval for sludge application operations to begin or;
 - 2) Require the permittee to perform additional site preparation (such work must be performed and approved prior to sludge application).

6. Application Measures

If at any time during the sludge application period the depth to groundwater is less than twenty (20) inches from the depth of tillage, all sludge application activities shall immediately cease and the Department shall be notified. Departmental approval shall then be required before sludge application operations can continue.

7. Post Application Measures

- a. The facility must provide the Department with a crop plan for the year in which stabilized sludge are to be applied to lands specified in this permit. Any changes to the crop rotation plan must be approved by the Department prior to implementation.
 - b. The Annual Report shall be submitted to the Department as required in Part I, F.1 of this permit. Should the permittee fail to supply the required documents on or before the deadline specified, the Department may revoke this permit.
8. If for any reason any of the contracts or agreements specified in the Project Development Report for one of the approved sites is cancelled or amended, approval granted for use of that site shall be void.

State Permit Number: DM 2402-K-03
Effective Date: December 1, 2024
Expiration Date: November 30, 2029



AUTHORIZATION TO CONDUCT
A LIMITED DISTRIBUTION AND MARKETING PROGRAM
FOR THE UTILIZATION OF SLUDGE OR SLUDGE PRODUCTS

Pursuant to the provisions of 7 Del. C., §6003

Kent County Levy Court
555 Bay Road
Dover, Delaware 19901

is hereby granted authorization to conduct a limited distribution and marketing program for the utilization of the following EQ biosolids products generated at the Kent County Regional Resource Recovery Facility:

Thermally treated sludge (mixed with or without heat dried sludge) with vector attraction reduction achieved by utilizing lime stabilization

Heat dried sludge (sludge dried in greenhouses) with vector attraction reduction achieved by utilizing lime stabilization

The general requirements, monitoring requirements and other permit conditions are set forth in Parts I, II and III hereof.

Gordon Woodrow, Program Manager
Commercial and Government Services
Division of Water
Department of Natural Resources
and Environmental Control

11-13-2024

Date Signed

Part I

A. GENERAL DESCRIPTION OF OPERATION

This operation involves sewage sludge stabilization through thermal and/or treatment to an EQ biosolids rating.

The primary treatment method involves the thermal treatment (heating sludge until it maintains a temperature of 75° Centigrade (C) for a minimum of 15 minutes) of sewage sludge generated by the Kent County Regional Resource Recovery Facility. Additionally, the sludge is required to be lime stabilized (sludge reaches and maintains a pH of 12 S.U. for a minimum of 2 hours and then maintains a pH of 11.5 or higher for an additional 22 hours) to meet vector attraction reduction requirements.

An additional treatment method involves utilizing the Parkson Thermo Drying System to achieve stabilization through a combination of wastewater treatment and heat drying (demonstrating that Fecal Coliform, Salmonella, Enteric Viruses and Viable Helminth Ova are below regulated levels) of sewage sludge generated by the Kent County Regional Resource Recovery Facility in greenhouses. The sludge is dried to at least 75% solids before distribution.

All EQ biosolids processing begins when unstabilized sewage sludge is dewatered on a belt filter press (typically to a range of 15-21% solids) and then mixed with lime using a variable speed pug mill mixer.

For the production of thermally treated biosolids, the dewatered sludge is conveyed to non-direct contact dryers (either dryer one or two and dryer three) used to heat the sludge to a temperature of at least 75° C for a minimum total time of 15 minutes. To ensure appropriate thermal treatment, confirmatory temperature readings of the sludge shall be collected and logged at minimum every two hours during processing from the outlet of the final dryer being utilized. Daily dryer retention confirmatory time measurements shall also be collected and the results shall be recorded in a bound log book. The 15 minute time check shall begin at the first temperature sensor located at the beginning of the second dryer row and end at the second temperature sensor near the discharge point for each dryer. The resultant Class A thermally treated biosolids product, marketed as "Kentorganite", may be utilized as a liming material and fertilizer for agronomic purposes in accordance with the "Kentorganite" product label.

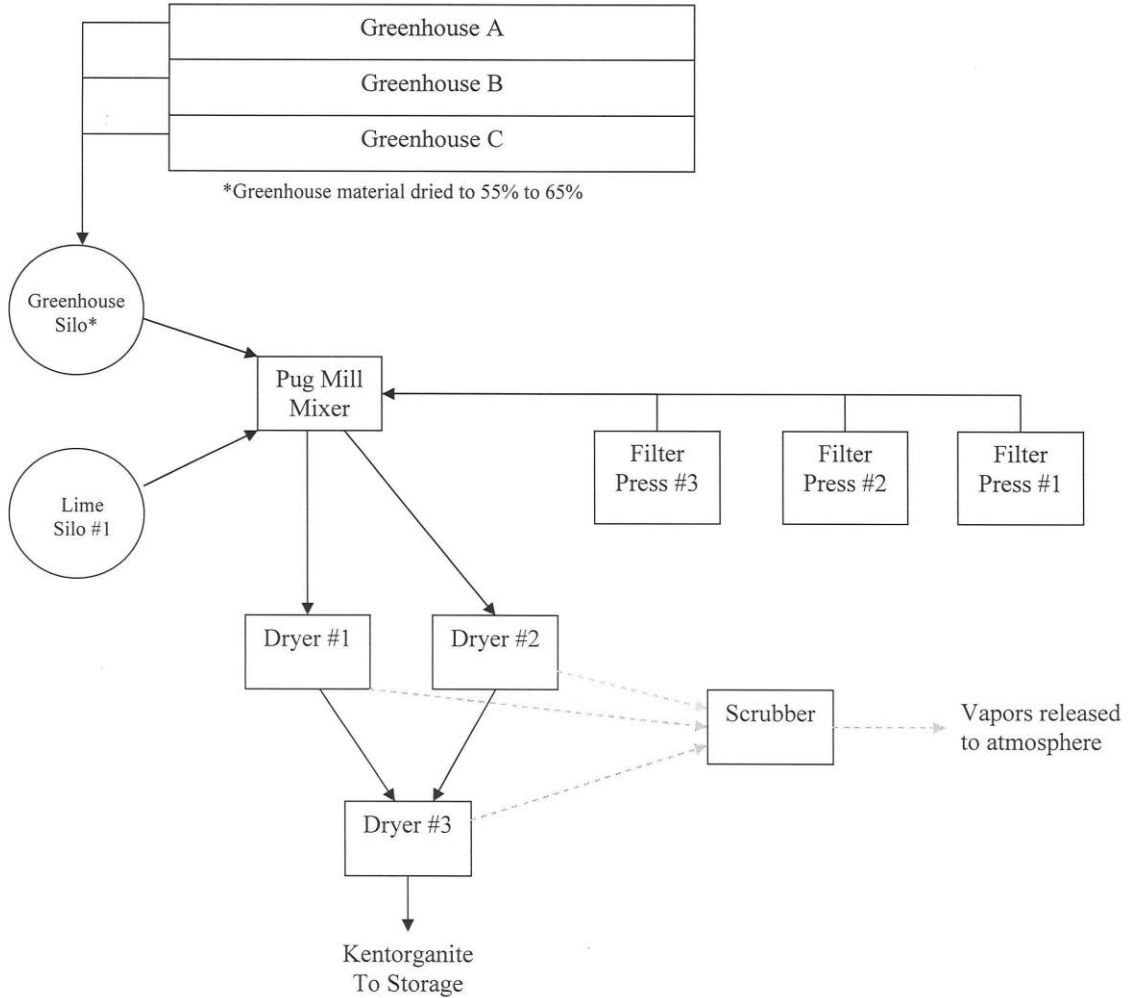
Sludge that will be heat dried is loaded into a spreader truck and transported to the Kent County Regional Resource Recovery Facility greenhouses from the thermal treatment processing building/cake storage shed. The material is then spread to an even depth of four to twelve inches throughout the greenhouses (except for a 6 foot arc in the corners is left intentionally empty due to inaccessibility of the sludge leveling/mixing mole to turn the material sufficiently). The greenhouses are heated from solar radiance through the glass panels

and/or heating of the greenhouse floor. Sludge remains in the greenhouses until the heat drying process dries the sludge and the solids content reaches 75% or more. At this point, the sludge is piled in the rear of the greenhouses or in a three sided enclosure under the cake storage shed for testing to demonstrate the sludge meets EQ biosolids criteria.

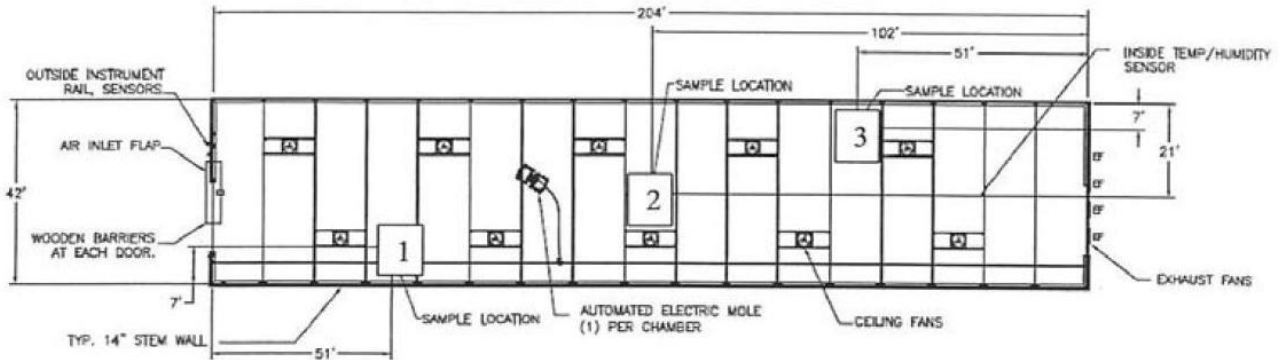
An optional supplemental sludge treatment method involves utilizing the "Parkson Thermo Drying System" for the partial heat drying of sewage sludge generated by the Kent County Regional Resource Recovery Facility in greenhouses until the dry solids content reaches approximately 55% to 65% solids. The partially heat dried sludge may then be collected and loaded into a silo adjacent to the lime silo at the sludge thermal treatment process building. Utilizing an auger, the partially heat dried sludge from the greenhouses may be mixed with the dewatered sludge cake prior to thermal treatment. The sludge mixture may then be thermally treated in the non-direct contact dryers to at least 75° C for a minimum of 15 minutes to achieve Class A pathogen reduction.

After thermal treatment or heat drying is achieved and the stabilized sludge is tested for parameters in Part I, E.1 of this permit, the EQ biosolids may be distributed and land applied at farm(s) or utilized for other approved end uses (within seven (7) days of delivery to the site). All product will be produced, stored and handled in accordance with specifications and instructions in the official "Kentorganite" product label.

B. THERMAL AND HEAT DRYING TREATMENT PROCESS SCHEMATICS



Typical Greenhouse Layout



C. REGULATORY AND SUPPORTING DOCUMENTS:

The limited distribution and marketing program shall be conducted in accordance with the following documents:

1. The Department's Guidance and Regulations Governing the Land Treatment of Wastes, Part III, (B); (October 1999 Revision);
2. Title 40 of the Code of Federal Regulations Part 503, "Standards for the Use and Disposal of Sewage Sludge";
3. The original permit application, dated April 2, 1993;
4. The Project Development Report for Biosolids in Greenhouse dated November 21, 2012;
5. Kentorganite product label dated November 21, 2012;
6. Request for the renewal of Kent County's limited distribution and marketing permit dated, December 5, 2013;
7. Request from Kent County Levy Court to adjust the thermal treatment retention time from 20 minutes to 15 minutes; and,
8. The request to renew State Permit Number DM1902-K-03 dated November 11, 2023

D. PROGRAM LIMITATIONS

1. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to conduct a Limited Distribution and Marketing Program for thermally treated and heat dried EQ biosolids generated at the Kent County Regional Resource Recovery Facility.
2. Only thermally treated and heat dried sludge, known as Kentorganite, which satisfies the EQ requirements as specified in Part III, (B), of the Guidance and Regulation Governing the Land Treatment of Wastes may be distributed under this permit.
3. Thermally Treated EQ Biosolids: In order to satisfy the minimum requirements for Class A conditions, the thermally treated lime-amended sludge must be maintained at operating temperatures of 75 degrees centigrade or greater for a minimum of fifteen (15) minutes. Additionally, the sludge must be maintained at a pH of 12 S.U. for a minimum of 2 hours and then at a pH of 11.5 or higher for an additional 22 hours. Furthermore, the density of Salmonella spp. bacteria in the sewage sludge shall be less than three (3) most probable number per four (4) grams of total solids **or** the fecal coliform shall be less than 1,000 most probable number per gram of total solids.
4. Heat Dried (Greenhouse) EQ Biosolids: In order to satisfy the minimum requirements for EQ conditions, the fecal coliform in the heat dried sludge must be less than 1,000 most probable number per gram of total solids **and** the density of Salmonella sp. bacteria in the sewage sludge shall be less than three (3) most probable number per four (4) grams of total solids. The density of enteric viruses in the sludge shall be less than one Plaque-forming Unit per four grams of total solids (dry weight basis). The density of viable Helminth Ova in the sludge shall be less than one per four grams of total solids (dry weight). Additionally, the sludge must be dried until the dry solids content reaches 75% or more.
5. Off-spec sludge product shall not be distributed. The sludge product shall be deemed to be off-spec if it fails to meet PFRP Class A conditions, vector control requirements, or any of the following pollutant concentrations are exceeded on a dry weight basis:

Arsenic	41 mg/kg	Cadmium	39 mg/kg	Chromium	1200 mg/kg
Copper	1500 mg/kg	Lead	300 mg/kg	Mercury	17 mg/kg
Molybdenum	18 mg/kg	Nickel	420 mg/kg	Selenium	36 mg/kg
Zinc	2800 mg/kg	PCB	3 mg/kg	-	-
Fecal Coliform 1000 colonies/gm (MPN)		Salmonella Density (sp) 3/4gm (MPN)			

6. Utilization of off-spec sludge product must receive separate authorization from the Department prior to distribution if it is not re-processed.

7. The permittee shall resample the sludge product and submit to the Department additional analysis if there has been a significant increase (greater than 25%) from a baseline established in the permit application. Based upon a review of the data submitted the Department may require the permittee to make changes in the product literature, may limit the allowable end uses, or may otherwise modify or revoke this permit.
8. EQ biosolids product generated at the Kent County Regional Resource Recovery Facility shall not be land applied on crops for direct human consumption and shall not be applied to land where root vegetables or vegetables which are eaten raw or are grown or will be grown within twenty-four (24) months. Kentorganite can be used on turf or sod farms and any crop that is a secondary consumption crop for humans such as animal feed crops.
9. EQ biosolids product may only be distributed as a liming material to raise soil pH or as a fertilizer for agricultural purposes and for use on athletic fields, golf courses, roadside grass strips and other similar grassy areas.
10. Copies of the product literature sheet, as submitted to the Department in the permit application, shall be distributed to each end-user.
11. Additional end uses of Kentorganite may be approved by the Department following Departmental written approval of use-specific product literature.
12. EQ biosolids shall be land applied at the land application farm within seven (7) days of delivery to the site. All product shall be stored and handled in accordance with the product label. The permittee shall not knowingly allow any customer to use the EQ biosolids product in any manner which is inconsistent with the product literature.
13. No EQ biosolids product may be stored or applied in a manner that causes surface or groundwater pollution, run-on/runoff, cause odor, adversely affect the food chain, attract vectors, or adversely affect private or public water supplies.
14. The permittee shall require the use of tarps or otherwise assure that all vehicles transporting EQ biosolids products from the facility are properly sealed to retain the EQ biosolids product in the vehicle during transportation.

E. MONITORING REQUIREMENTS

During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to conduct a Limited Distribution and Marketing program for the EQ biosolids product generated at the Kent County Regional Resource Recovery Facility. Product for distribution and marketing shall be monitored by the permittee as specified below:

1. THERMALLY TREATED AND HEAT DRIED SLUDGE PRODUCT

Parameter	Measurement	Minimum Frequency	Sample Type
Moisture content	percent	Monthly	Composite
Total Nitrogen as N (moist and dry weight basis)	percent	Monthly	Composite
Organic Nitrogen as N (moist and dry weight basis)	percent	Monthly	Composite
Ammonium as N (moist and dry weight basis)	percent	Monthly	Composite
Nitrate Nitrogen as N (moist and dry weight basis)	percent	Monthly	Composite
Phosphorus (dry weight basis)	percent	Monthly	Composite
Potassium (dry weight basis)	percent	Monthly	Composite
Volatile solids	percent	Monthly	Composite
Calcium Carbonate Equivalence	percent	Monthly	Composite
Salmonella (spp.) (Colonies/4gm)	MPN	Monthly	Composite
pH	S.U.	Monthly	Composite
Aluminum (dry weight basis)	mg/kg	Monthly	Composite
Arsenic (dry weight basis)	mg/kg	Monthly	Composite
Cadmium (dry weight basis)	mg/kg	Monthly	Composite
Chromium (dry weight basis)	mg/kg	Monthly	Composite
Chlorides (dry weight basis)	mg/kg	Monthly	Composite
Copper (dry weight basis)	mg/kg	Monthly	Composite
Iron (dry weight basis)	mg/kg	Monthly	Composite
Lead (dry weight basis)	mg/kg	Monthly	Composite
Mercury (dry weight basis)	mg/kg	Monthly	Composite
Molybdenum (dry weight basis)	mg/kg	Monthly	Composite
Nickel (dry weight basis)	mg/kg	Monthly	Composite
Selenium (dry weight basis)	mg/kg	Monthly	Composite
Sodium (dry weight basis)	mg/kg	Monthly	Composite
Zinc (dry weight basis)	mg/kg	Monthly	Composite
PCB's (dry weight basis)	mg/kg	Monthly	Composite
Priority pollutant scan (see NOTE)	---	Every 3 years	Composite

* Thermally treated sludge samples shall be collected at the following location: Dryer three (3) discharge belt. Sampling for the above parameters are not be required for both heat dried sludge and thermally treated sludge in the same month. If heat dried sludge is produced in a month, every batch shall be samples for the parameters listed in Part B. 3 of this permit.

Note: Every batch sample collected for heat dried sludge shall be analyzed for Salmonella sp. and fecal coliform. All processed sludge samples shall be collected and analyzed in accordance with the Quality Assurance Program.

See Part I, I.1. for reporting requirements. After notice and opportunity for a hearing, the Department may modify the list of parameters required to be monitored and/or the frequency of monitoring.

2. THERMALLY TREATED SLUDGE PRODUCT STABILIZATION AND TREATMENT PROCESS MONITORING

<u>Parameter</u>	<u>Unit Measurement</u>	<u>Minimum Sampling Frequency</u>	<u>Sample Type</u>
Temperature	Degrees Centigrade	Beginning and end of each active dryer every two (2) hours	Grab
Salmonella sp. or fecal coliform	MPN (dry weight basis)	Monthly	Composite
pH*	S.U.	Initially, two (2) hours, and 22 hours thereafter	Grab

NOTE: Temperature and pH monitoring results shall be recorded in a bound log book submitted as part of the Quality Control Program.

Daily 15 minute dryer retention time confirmatory tests shall be conducted and the results shall be recorded in a bound log book. The starting timing point shall be at the first temperature sensor located at beginning of the second dryer row of each dryer and at end point shall be at the second temperature sensor located near the discharge location for each drier (as appropriate).

All temperature probes utilized for treatment process monitoring shall be calibrated against a NIST Certified thermometer at minimum quarterly and documented in a bound log book. All temperature probes shall be marked with a designated number for tracking purposes. The log book shall include the date of calibration, probe number, and the signature of the individual that conducted the calibration.

See Part I, I.1 for reporting requirements.

*Other vector attraction reduction methods may be approved by the Department in writing.

3. HEAT DRIED SLUDGE PRODUCT STABILIZATION AND TREATMENT PROCESS MONITORING

<u>Parameter</u>	<u>Unit Measurement</u>	<u>Minimum Sampling Frequency</u>	<u>Sample Type</u>
Salmonella sp. or fecal coliform	MPN (dry weight basis)	Every Batch	Composite
Enteric Viruses	Plaque-forming unit per four grams of total solids (dry weight basis)	Every Batch	Composite
Viable Helminth Ova	One per four grams of total solids (dry weight basis)	Every Batch	Composite
Dry Solids Content	%	Every Monday, Wednesday and Friday for every batch	Composite
pH	S.U.	At completion of every batch initially, two (2) hours and 22 hours thereafter.	Grab

NOTE: Provided that none of the samples fail to meet exceptional quality requirements during within one year of this modification date of this permit, heat treated biosolids materials from the three greenhouses may be combined into a single pile and a composite sampled collected for the parameters above.

4. OTHER MONITORING AS REQUIRED BY THE DEPARTMENT

The Permittee shall perform additional monitoring of EQ biosolids upon Department notification. Monitoring requirements may include increased sampling frequency, additional sampling parameters/contaminants, and/or additional monitoring locations to assure the protection of human health and/or water resources. Analytical results from additional monitoring shall be submitted in monthly reports unless the Department requires an alternative submission schedule.

F. SCHEDULE OF COMPLIANCE

None

G. BONDING

Not required pursuant to Part III, (B), Section 126 of the Guidance and Regulations Governing the Land Treatment of Wastes.

H. MONITORING

1. Representative Sampling

- a. Samples and measurements taken as required herein shall be representative of the volume and nature of the sludge product to be distributed and marketed.
- b. All thermally treated and/or heat dried sludge product must be analyzed for the parameters identified in Part I, E.1, E.2 and E.3 of this permit, as applicable, prior to distribution.

2. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact place, date and time of sampling and/or measurement;
- b. The person(s) who performed the sampling and/or measurement;
- c. The dates and analyses were performed and the time the analyses were begun;
- d. The person(s) who performed the analyses (if applicable);
- e. The results of each analysis, along with the original laboratory report; and,
- f. The analytical methods employed.

3. Records Retention

All records and information resulting from the monitoring activities required by this permit, including all records of analyses performed and calibration and maintenance of instrumentation and recording from continuous monitoring instrumentation, shall be retained for five (5) years. This period of retention shall be extended automatically during the course of any unresolved litigation regarding the regulated activity or regarding control standards applicable to the permittee, or as requested by the Department.

I. REPORTING

1. Monthly Report

- a. Upon Department request, sludge product analytical and stabilization process monitoring data obtained during the previous one (1) month shall be summarized for each month and submitted no later than the 28th day of the month following the completed reporting period. Signed copies of these, and all other reports required herein, shall be electronically submitted to the Department to biosolids_de@delaware.gov
- b. When submitting monitoring results, copies of the original laboratory sheets should be included. If more than one sample is analyzed during any month, a table showing the range of constituent concentration values shall be prepared and included with the submittal. Monthly reports may be submitted electronically or in any format specified by the Department.
- c. Upon Department request, temperature and pH monitoring of the sludge product as required in Part I, E.2 and E.3 of this permit, shall be summarized in the monthly report.

2. Annual Report

The permittee shall submit to the Department an annual report to include the date, customer, shipping destination and quantity per customer for all sludge products distributed during the previous year. The annual report may be submitted electronically or in any format specified by the Department. The annual report shall be due on February 1 of each year, and the information contained in the report shall cover the previous calendar year.

3. Test Procedures

Test procedures for laboratory analyses shall conform to the applicable test procedures identified in Section 152 of Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes, Title 40, Code of Federal Regulations, Part 503, Subsection 503.8 and to the applicable test procedures identified in the Quality Control Program.

J. DEFINITIONS

1. "Class A" means sludge that has undergone a process to further reduce pathogens (PFRP) in Part III, B. of the Department's Guidance and Regulations Governing the Land Treatment of Wastes.
2. "Composite" means a series of grab samples which have been collected in a manner such that the final sample is representative of the volume and characteristics of the sludge to be distributed.
3. "Distribute" means to barter, sell, offer for sale, consign, furnish, provide, or otherwise supply a material as part of a commercial enterprise or giveaway program.
4. "Exceptional Quality Biosolids" ("EQ Biosolids") sludge that has been stabilized by a PFRP, meets Vector Attraction Reduction Requirements and contains lower metal concentrations than the allowable Pollutant Concentration levels.
5. "Food chain crops" means tobacco, crops grown for human consumption, and crops grown to feed animals whose products are consumed by humans.
6. "Handling" means any way in which sludge, treated sludge, or any other product containing these materials is dealt with, other than collection, burning, storage, treatment, land application, disposal, or transportation. It includes distribution of treated sludge.
7. "Heat dried sludge product" means sludge which has undergone processing to meet PFRP standards that is verified by testing fecal coliform, Salmonella sp., enteric viruses, and viable helminth ova. The sludge is heat dried by using thermal radiance from the sun to dry the product to a dry solids content of 75% or greater.
8. "Label" means the display of all written, printed, or graphic material on the immediate container, or information accompanying the material.
9. "Landfill" means a natural topographic depression, man-made excavation or diked area formed primarily of earthen materials, which has been lined with man-made materials or remains unlined and which is designed to hold an accumulation of solid wastes.
10. "Person" means an individual, trust, firm, joint stock company, federal agency, corporation (including a government corporation), partnership, association, state, municipality, commission, political subdivision of a state, or any interstate body.
11. "Sewage" means water-carried human or animal wastes from septic tanks, water closets, residences, buildings, industrial establishments, or other places, together with such groundwater infiltration, subsurface water, admixture of industrial

wastes or other wastes as may be present.

12. "Sewage sludge" means sludge which derives in whole or in part from sewage.
13. "Sludge" means the accumulated semi-liquid suspension, settled solids, or dried residue of these solids that is deposited from (a) liquid waste in a municipal or industrial wastewater treatment plant, (b) surface or ground waters treated in a water treatment plant, whether or not these solids have undergone treatment. Septage is included herein as sludge.
14. "Solid waste" means any garbage, refuse, rubbish, and other discarded materials resulting from industrial, commercial, mining, agricultural operations and from community activities which does not contain free liquids. Containers holding free liquids shall be considered solid waste when the container is designed to hold free liquids for use other than storage (e.g. radiators, batteries, transformers) or the waste is household waste.
15. "Storage" means the interim containment of sludge, treated sludge, or any other product containing these materials after removal from the wastewater and before disposal or utilization.
16. "Thermally treated sludge product" means sludge which has undergone processing to meet PFRP standards by increasing temperature to 75°C or greater for a minimum of fifteen (15) minutes.
17. "Treatment" means a process which alters, modifies or changes the biological, physical, or chemical characteristics of sludge or liquid waste.
18. "Vector Attraction Reduction (VAR)" means sludge that undergone one of the

Part II

A. MANAGEMENT REQUIREMENTS

1. Noncompliance Notification

The permittee shall report to the Department at biosolids_de@delaware.gov:

- a. In writing, thirty (30) days before any planned change to the sludge treatment process or the distribution and marketing program, if that change would result in any alterations to the program as represented in the permit application.
- b. In writing thirty (30) days before any anticipated change which would result in noncompliance with any permit condition, the Guidance and Regulations Governing the Land Treatment of Wastes or 40 CFR, Part 503, Standards for the Use and Disposal of Sewage Sludge.
- c. Orally within twenty-four (24) hours from the time the permittee became aware of any noncompliance which may endanger the public health or the environment, at (800) 662-8802. In addition, a call must be placed at (302) 739-9946 during normal business hours, and;
- d. In writing as soon as possible but within five (5) days of the date the permittee knows or should know of any noncompliance unless extended by the Department. This report shall contain:
 - 1) A description of the noncompliance and its cause.
 - 2) The period of noncompliance including to the extent possible, times and dates and, if the noncompliance has not been corrected, the anticipated time it is expected to continue.
 - 3) Steps taken or planned to reduce or eliminate reoccurrence of the noncompliance.
- e. In writing as soon as possible after the permittee becomes aware of relevant facts not submitted or incorrect information submitted, in a permit application or any report to the Department. Those facts or the correct information shall be included as a part of this report.

2. Minimize Impacts

The permittee shall take all necessary actions to eliminate and correct any adverse impact on the public health or the environment resulting from permit noncompliance.

B. RESPONSIBILITIES

1. Renewal Responsibilities

At least 180 days before the expiration date of this permit, the permittee shall submit a new application for a permit or notify the Department of the intent to cease operation of the distribution and marketing program by the expiration date. In the event that a timely and sufficient reapplication has been submitted and the Department is unable, through no fault of the permittee, to issue a new permit before the expiration date of this permit, the terms and conditions of this permit are automatically continued and remain fully effective and enforceable.

2. Entry and Access

The permittee shall allow the Department, consistent with 7 Del. C., Chapter 60, to:

- a. Enter the permitted facility.
- b. Inspect any records that must be kept under this permit.
- c. Inspect any facility, equipment, practice, or operation permitted or required by this permit.
- d. Sample or monitor for the purpose of assuring permit compliance, any substance or any parameter at the facility or land application site.

3. Provide Information

The permittee shall furnish to the Department within a reasonable time, any information requested, including copies of records, which may be used by the Department to determine whether cause exists for modifying, revoking, reissuing, or terminating the permit, or to determine compliance with the permit or Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes.

4. Transfer of Ownership or Control

This permit shall be transferable to a new owner or operator provided that the permittee notifies the Department by requesting a minor modification of the permit before the date of transfer and provided that the transferee shows evidence of a legal right to use the site and is otherwise in compliance with all applicable provisions of the Department's Guidance and Regulations Governing the Land Treatment of Wastes.

5. Operation of Facility

The permittee shall at all times properly maintain and operate all structures, systems, and equipment for treatment, control and monitoring, which are installed or used by the permittee to achieve compliance with 7 Del. C., Chapter 60, this permit, or Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes.

6. Permit Revocation and Modification

a. After notice and opportunity for a hearing, this permit may be modified or revoked in whole or in part during its term for causing including, but not limited to, the following:

- 1) Violation of any terms or conditions of this permit;
- 2) Obtaining this permit by misrepresentation or failure to disclose fully all of the relevant facts;
- 3) Any change in operating conditions that requires either a temporary or permanent permit modification; or
- 4) If the Department finds that the public health, safety or welfare requires emergency action, the Department shall incorporate findings in support of such action in a written notice of emergency revocation issued to the permittee. Emergency revocation shall be effective upon receipt by the permittee. Thereafter, if requested by the permittee in writing, the Department shall provide the permittee a revocation hearing and prior notice thereof. Such hearings shall be conducted in accordance with 7 Del. C., Chapter 60.

b. The Department may revoke this permit if the permittee violates any permit condition, any provisions of Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes, or fails to pay applicable Department fees.

7. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation.

8. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any

infringement of Federal, State or local laws or regulations.

9. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application or any provision of this permit to any circumstances, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

10. Compliance Required

The permittee shall comply with all conditions of the permit.

11. Reopener

In the event that the Part III, B, of the Guidance and Regulations Governing the Land Treatment of Wastes or applicable Federal Regulations are revised, this permit may be reopened and modified accordingly after notice and opportunity for a public hearing.

Part III

A. SPECIAL CONDITIONS

1. Supersedes Previous Permit

This permit supersedes all previous distribution and marketing permits issued by the Department.
2. The Facility must comply with the Federal Code of Regulations, Title 40, Part 503, "Standards for the Use and Disposal of Sewage Sludge" in the production, distribution and management of the sludge products.
3. For contractors who may utilize more than 100 tons of sludge product per year, a plan must be submitted to the Department which addresses the following:
 - a. The end use(s) of the material
 - b. Maximum application rates
 - c. Total amount of material to be utilized
 - d. Storage practices
 - e. Transportation methods
4. The permittee shall maintain a log of all persons that receive more than ten (10) cubic yards of sludge product material on an annual basis. At minimum this log shall include the name of the purchaser, the amount purchased, the date of the purchase, and the proposed end use. This log shall be maintained in accordance with Part I, H. 3 of this permit.
5. Product literature sheets, as submitted to the Department in the permit application, shall be distributed to each end-user.
6. In accordance with the Department's Regulations Governing Solid Waste, the Department must approve utilization or disposal of sludge at landfill sites in writing before the sludge may be transported to the landfill.
7. Off-spec sludge that has not met the EQ criteria shall be transported only in accordance with a valid Delaware Waste Transporters Permit.



AUTHORIZATION TO OPERATE A LAND TREATMENT SYSTEM
FOR THE
AGRICULTURAL UTILIZATION OF SLUDGE

Pursuant to the provisions of 7 Del. C., §6003

Kent County Levy Court
555 Bay Road
Dover, Delaware 19901

is hereby granted a permit to operate land treatment systems for the agricultural utilization of Class B sludge generated by the Kent County Wastewater Treatment Facility. This permit is limited to the application of stabilized Class B sludge from the Kent County Wastewater Treatment Facility at agronomic rates to the site designated in this permit, known as the Vineyard Farm.

Should Class A sludge from the Kent County Wastewater Treatment Facility be utilized on the Vineyard Farm, the Class A sludge shall be prepared and applied in accordance with State Distribution and Marketing (DM) Permit Number DM 1902-K-03 (as amended), Part III, B. of the Department of Natural Resources and Environmental Control's (Department) Guidance and Regulations Governing the Land Treatment of Wastes, the Kentorganite Class A Biosolids Fertilizer Product label, and in accordance with applicable requirements in this permit.

The application rates, monitoring requirements and other permit conditions are set forth in Parts I, II and III hereof.

Nicole L. Smith, Program Manager
Surface Water Discharges Section
Division of Water
Department of Natural Resources
and Environmental Control

Date Signed

Part I

A. GENERAL DESCRIPTION OF OPERATION

The operation involves the land application of Class B stabilized sludge from the Kent County Wastewater Treatment Facility onto the site location listed below. Class B sludge generated at the Kent County Wastewater Treatment Plant may also be land applied to site locations listed in State Permit Number AGU 1901-K-03 (as amended). Class B sludge shall be delivered to the site in accordance with Delaware Waste Transporters Permit No. OH-11.

Sludge stabilization of Class B sludge will be achieved by an approved alternative found in Part III, (B), Section 133 or 134 of the Guidance and Regulations Governing The Land Treatment of Wastes, and Title 40 Code of Federal Regulations, Part 503, Standards for the Use or Disposal of Sewage Sludge. Should Class A sludge be utilized at the Vineyard Farm, stabilization of Class A sludge shall be in accordance with State Permit Number DM 1902-K-03 (as amended).

B. SITE LOCATION

1. The Vineyard Farm North and South Fields Site Description:

The site consists of one parcel of land consisting of approximately 148 acres, of which approximately 119 acres are suitable for land application. The Vineyard Farm is located on the east side of Carpenter Bridge Road (Road #35) approximately 1 mile southwest of Frederica.

Tax parcel number: SM-00-140.00-01-76.00-000



Note: Refer to land application map in Exhibit V-3 sheet 1 of the March 2016 project development report (PDR) for the specific land application area, seasonally restricted areas, monitoring well locations and exclusion areas. Refer to Exhibit I-1 for a map showing land application acreages, setback areas and sensitive areas. The sensitive area in the northeast part of the north field shall not have sludge applied to the surface without incorporation and shall never have sludge applied if rainfall is forecast within 72 hours of a predicted rain event. The sensitive area noted in the southeast area of the of the south field shall be limited to seasonal application (May through August) unless the groundwater level is confirmed to be at least 20 inches below the depth of tillage prior to sludge application in this area.

C. REGULATORY AND SUPPORTING DOCUMENTS:

The land treatment operations shall be conducted in accordance with the following documents:

1. The Department of Natural Resources and Environmental Control's Guidance and Regulations Governing the Land Treatment of Wastes, Part III, (B); (October 1999 Revision);
2. Title 40 of the Code of Federal Regulations Part 503, Standards for The Use and Disposal of Sewage Sludge, Final rule date February 19, 1993;
3. Title 3, Chapter 22, The Department of Agricultural Nutrient Management Law;
4. State Permit Number DM 1902-K-03;
5. The Letter of Intent dated December 11, 2013;
6. Hydrogeologic Evaluation for Land Application of Biosolids at the Vineyard Farm dated July 28, 2014;
7. The Soils Evaluation for Land Application of Biosolids for Vineyard Farm, Carpenters Bridge Road dated August 4, 2014.; and,
8. The revised Project Development Report (PDR) for the Vineyard Farm, dated March, 2016.
9. The request to renew State Permit Number AGU 1604-K-03 dated August 12, 2021.

D. SLUDGE APPLICATION LIMITATIONS

1. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to operate land treatment site as identified on page 3 of this permit for the application of stabilized sludge at agronomic rates. The timing of sludge application to the fields, as well as the quantity and quality of sludge to be land applied, shall be specified in an annual Nutrient Management Plan (NMP) and in accordance with the limitations below.
2. Sludge shall be applied at agronomic rates established for the subsequent cropping plan. Mineralized nitrogen from prior application must be considered in calculating nitrogen application rates.
3. Sludge shall be applied at a rate to meet, but not exceed, the Plant Available Nitrogen (PAN) requirement for the crop(s) grown. All nutrient application rates shall be determined by a Delaware Certified Nutrient Consultant. The PAN application rates shall also include any residual mineralized nitrogen from previous sludge application. The cropping plan and the nutrient requirement for that crop shall be submitted to the Department, prior to sludge application, for review and approval.
4. Supplemental additions of fertilizers (i.e., commercial fertilizer, manure, Class A biosolids, etc.) shall be limited to amounts necessary to meet crop needs using the written recommendations of a Delaware Certified Nutrient Consultant for the specified crop and anticipated yield.
5. Fields with "high" phosphorus soil levels as defined by Title 3, Chapter 22 of the Delaware Code (the Nutrient Management Law) and the Delaware Nutrient Management Commission (150 FIV) shall be in compliance with a current Nutrient Management Plan and phosphorus management requirements in the Nutrient Management Law. Utilization of the phosphorous site index (PSI) and phosphorus management strategies, as recommended by the University of Delaware Cooperative Extension, may also be utilized to comply with the Nutrient Management Law.
6. For any portions of the sludge application area where the depth to seasonal high-water table is less than 20 inches but greater than 12 inches, application is limited to May, June July or August. Sludge shall only be applied when the actual water table depth is at least 20 inches below the maximum depth of tillage as defined in Part I, G. 3 of this permit and pursuant to Part III, (B), Subsection 138.6 of the Guidance and Regulations Governing the Land Treatment of Wastes.
7. The depth to water of all observation wells and/or monitoring wells surrounding application fields must be monitored and the results recorded before land application begins each calendar year. Groundwater level measurements shall continue monthly until land application activities cease. The frequency of water-level monitoring must increase to weekly in any monitoring well containing a depth to water reading that is within 3 feet of the ground surface. Should water-

level readings indicate that areas of the sludge field have or likely have a water table that is within 20 inches of the ground surface, sludge application in these areas must cease immediately and be discontinued until the limiting situation has passed. Annual water-level monitoring can resume once the DTW readings drops to less than 3 feet below ground surface.

8. Only sludge, which has been treated by a Process to Significantly Reduce Pathogens (PSRP), as defined in Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes, shall be applied to the land treatment site.
9. A sufficient amount of lime to adjust the soil pH to a value of 6.2 or above shall be applied to the site prior to sludge application. If lime stabilized sludge is to be utilized for land application, a sufficient amount of lime stabilized sludge shall be added to the application site to raise the pH to 6.2 or above at the time of application.
10. Sludge may not be applied when the ground is frozen, saturated or covered with snow or during periods of rain or runoff. Sludge may not be applied from December 7 through February 15 unless the permittee receives written approval from the Department to land apply sludge during this period.
11. Fields that receive land application of sludge must have appropriate vegetation established and harvested during the growing season(s) to receive nutrient uptake credits. Fields must be planted with appropriate vegetation or a cover crop within one (1) month of completing sludge application, unless prohibited by weather conditions in which case vegetation must be established as soon as practicable.
12. The sludge shall be applied so that the application is uniform. As long as no till farming is continued to be practiced at the Vineyard Farm, applied sludge may remain unincorporated provided that sludge migration from the application area does not occur and odors and nuisances are not created by the sludge.
13. If objectionable odors, vectors, or other nuisance conditions from land application activities regulated under this permit impact neighboring properties, the Department may require the addition of lime (or another odor mitigating substance) to the land application fields after application of sludge and/or require lime to be added to sludge prior to land application. In addition, if the Department determines nuisance vectors from land application activities are affecting neighbors, pest management practices shall be immediately implemented by the utilization of appropriate pesticides in accordance with State and Federal requirements. The Department may require additional odor, vector, and/or nuisance control measures to be taken for any sludge application under this permit, if deemed necessary.
14. After application of Class B sludge:
 - a. Livestock shall not be allowed to graze on land application fields for at

least thirty (30) days subsequent to application of sludge.
 Feed and fiber crops removed from the sludge land application site shall not be harvested until at least thirty (30) days after the application of sludge.

- b. Food crops may not be harvested from the sludge application area for at least 24 months after the application of sludge.
 - c. Food crops with harvested parts below the surface of the land shall not be harvested for 38 months after application of sewage sludge.
 - d. Public access to the sludge application area must be restricted for at least twelve (12) months.
15. At minimum, buffer zones established pursuant to Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes and the 2014 PDR (as amended), whichever are more stringent, shall be maintained at all times for sludge application. A minimum application setback distance of 200 feet from western edge of the right of way on Carpenter Bridge Road will be maintained. Additionally, an application setback in accordance with engineering drawing V-3 Sheet 1, from the Kent County Vineyard Farm 2016 Project Development Report, must be maintained from Carpenter Bridge Road and the southeast corner of the South Field. During the "Pre-Start Up" inspection as required in Part III, 6., of this permit, the Department may require increased buffer zones as allowed in Section 138.2.2 of Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes. Considerations may include adjacent land use, type of sludge, sludge application method, sludge application rate, sludge quality and level of treatment, land slopes, vegetative cover used the nature of surrounding bodies of water and any other factors considered relevant by the Department.
16. No sludge shall be applied if sample analysis yields pollutant concentrations in excess of the following values:

Arsenic	75 mg/kg	Cadmium	85 mg/kg	Chromium	1000 mg/kg
Copper	4300 mg/kg	Lead	840 mg/kg	Mercury	57 mg/kg
Molybdenum	75 mg/kg	Nickel	420 mg/kg	Selenium	100 mg/kg
Zinc	7500 mg/kg	PCB	3 mg/kg		

E. GROUNDWATER LIMITATIONS

Application of sludge to the designated fields shall not exceed applicable Federal or State drinking water standards on an average annual basis. If down-gradient water supply wells (public or private) exceed applicable Federal or State drinking water standards from the land application of sludge, the permittee shall be required to provide a Department approved alternative potable water supply to any affected parties at no cost to them.

F. MONITORING REQUIREMENTS

During the period beginning on the effective date and lasting through the expiration date, the permittee is authorized to apply stabilized sludge at agronomic rates to the sludge application sites found in Part I, of this permit. Applications shall be monitored by the permittee as specified below:

1. STABILIZED SLUDGE

- a. During periods when Class B sludge is not land applied and sludge is prepared in accordance with State Permit Number DM 1904-K-03 (as amended) the monitoring and reporting requirements of the DM permit will fulfill the monitoring and reporting requirements of Part F.1, F.2 and F.3 of this permit.
- b. When Class B sludge is prepared for land application in accordance with this permit, monitoring is required as specified below:

Parameter	Unit Measurement	Minimum Frequency	Sample Type
Moisture Content	percent	Monthly	Composite
Total Nitrogen as N (Moist & Dried)	percent	Monthly	Composite
Organic Nitrogen as N (Moist & Dried)	percent	Monthly	Composite
Ammonium and Nitrate Nitrogen as N (Moist & Dried)	percent	Monthly	Composite
pH	S.U.	Monthly	Composite
Volatile Solids	percent	Monthly	Composite
Phosphorus as P (dry weight basis)	percent	Monthly	Composite
Potassium (dry weight basis)	percent	Monthly	Composite
Aluminum (dry weight basis)	mg/kg	Monthly	Composite
Arsenic (dry weight basis)	mg/kg	Monthly	Composite
Cadmium (dry weight basis)	mg/kg	Monthly	Composite
Chlorides (dry weight basis)	mg/kg	Monthly	Composite
Chromium (dry weight basis)	mg/kg	Monthly	Composite
Copper (dry weight basis)	mg/kg	Monthly	Composite
Lead (dry weight basis)	mg/kg	Monthly	Composite
Mercury (dry weight basis)	mg/kg	Monthly	Composite
Molybdenum (dry weight basis)	mg/kg	Monthly	Composite
Nickel (dry weight basis)	mg/kg	Monthly	Composite
Selenium (dry weight basis)	mg/kg	Monthly	Composite
Sodium (dry weight basis)	mg/kg	Monthly	Composite
Zinc (dry weight basis)	mg/kg	Monthly	Composite
Fecal Coliform (MPN dry wt. basis)	colonies/g	Monthly	Composite
PCB's (dry weight basis)	mg/kg	Monthly	Composite
Priority Pollutant Scan	-----	Every 3 years	Composite

Sludge samples shall be collected following dewatering from a location that allows for representative sampling of the sludge. All sludge samples shall be taken and analyzed in accordance with Section 151 of the Department's Guidance and Regulations Governing the Land Treatment of Wastes. See Part I J. for reporting frequencies.

NOTE: The 126 priority pollutants list can be found in 40 CFR, Part 423, Appendix A, 1987

2 SLUDGE STABILIZATION PROCESS MONITORING

All approved Class B sludge prepared for land application at the site must meet the requirements in Part III, Section 133.1.2.5 (lime stabilization) of the Guidance and Regulations Governing the Land Treatment of Wastes. The permittee must obtain approval from the Department to utilize a different Class B stabilization process. If Class B sludge for application under this permit is not produced in a calendar year, the permittee shall be exempt from the sludge stabilization process monitoring requirements of this permit. See Part I, J. for reporting requirements.

3 VECTOR ATTRACTION REDUCTION

Vector attraction reduction must be achieved by pH adjustment, "pH of sewage sludge shall be raised to 12 or higher by alkaline addition and, without the addition of more alkali shall remain at 12 or higher for two hours and then at 11.5 or higher for an additional 22 hours" or other alternative methods for achieving vector attraction reduction found in Subsection 135 of Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes, may be employed with prior Department approval.

4. SOIL MONITORING

Soil monitoring shall commence at least thirty (30) days prior to land application at the locations and frequency outlined below. The permittee shall be exempt from the requirements of this section if no sludge is land applied. A copy of all soil monitoring results required by this permit shall be submitted to the Department in accordance with Part I, J.2 of this permit. The Department may modify the sampling frequency based upon review of continuing or additional analyses.

Parameter	Unit Measurement	Minimum Frequency	Sample Type
pH	S.U.	Annually	Composite
Phosphorus as P (dry weight basis)	mg/kg	Annually	Composite
Potassium (dry weight basis)	mg/kg	Annually	Composite
% Organic Matter	percent	Annually	Composite
Arsenic (dry weight basis)	mg/kg	*	Composite
Cadmium (dry weight basis)	mg/kg	*	Composite
Copper (dry weight basis)	mg/kg	*	Composite
Chromium (dry weight basis)	mg/kg	*	Composite
Lead (dry weight basis)	mg/kg	*	Composite
Mercury (dry weight basis)	mg/kg	*	Composite
Molybdenum (dry weight basis)	mg/kg	*	Composite
Nickel (dry weight basis)	mg/kg	*	Composite
Selenium (dry weight basis)	mg/kg	*	Composite
Zinc (dry weight basis)	mg/kg	*	Composite
Aluminum (dry weight basis)	mg/kg	Annually	Composite
Magnesium (dry soil basis)	mg/kg	Annually	Composite
Manganese (dry soil basis)	mg/kg	Annually	Composite
Iron (dry weight basis)	mg/kg	Annually	Composite
Sodium (dry soil basis)	mg/kg	Annually	Composite
% Organic Matter	Percent	Annually	Composite

NOTE: Composite soil samples representing each soil series identified within each sludge application area shall be collected in accordance with the Kent County Sludge Management Manual. Soil chemistry testing must be in accordance with the Methods of Soil Analysis published by the American Society of Agronomy, and in accordance with Part III, (B), Section 151 of the Department's Guidance and Regulations Governing the Land Treatment of Wastes. See Part I, J.1. for reporting requirements.

* If Class B sludge is applied during the effective period of this permit, the parameters above marked with a * shall be monitored at least once during the effective period of this permit. Parameters marked with a * are not required to be sampled if only "Class A" "EQ" sludge is applied during the effective period of this permit.

5. PLANT TISSUE AND GRAIN ANALYSIS

None is required at this time.

6. GROUNDWATER MONITORING

Parameter	Unit Measurement	Minimum Frequency	Sample Type
Depth to Water	hundredths of a foot	Annually	In-Situ
Dissolved Oxygen	mg/l	Annually	Field Test
pH	S.U.	Annually	Field Test
Specific Conductivity	UMHOS/CM	Annually	Field Test
Temperature	°C	Annually	Field Test
Ammonium as N	mg/l	Annually	Grab
Nitrate Nitrogen as N	mg/l	Annually	Grab
Total Nitrogen as N	mg/l	Annually	Grab
Total Phosphorus	mg/l	Annually	Grab
Total Dissolved Solids	mg/l	Annually	Grab
Chloride	mg/l	Annually	Grab
Sodium	mg/l	Annually	Grab

- a. Groundwater samples shall be collected and analyzed individually from all monitoring wells (MW-1 = 246596, MW-2 = 246598, MW-3 = 246597, MW-4 = 246599, MW-5 = 246600, "MW-A" = 256986, and "MW-B" = 256994). All groundwater samples shall be taken in compliance with the monitoring requirements specified above and shall be taken at each monitoring well in accordance with procedures approved by the Department and listed in the Department's Field Manual for Groundwater Sampling (March, 1988). A request to suspend groundwater monitoring may be made when sludge has not been applied for three or more consecutive years.
- b. Groundwater monitoring results for each monitoring well shall be reported using the State of Delaware Well Identification Tag Number that is required on all wells in accordance with the Delaware Regulations Governing the Construction and use of Wells, Section 10, A.
- c. After notice and opportunity for a hearing, the Department may modify the list of parameters to be monitored and/or the frequency of monitoring by the permittee based upon observations of ground water quality trends in the area.
- d. If sludge has not been applied for three (3) or more years, the permittee may request suspending groundwater monitoring at the corresponding farm.

G. SCHEDULE OF COMPLIANCE

None at this time

H. BONDING

Not Required

I. MONITORING

1. Representative Sampling:

Samples and measurements taken as required in this permit shall be representative of the volume and nature of the sludge to be land applied.

2. Recording of Results:

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact place, date and time of sampling and/or measurement;
- b. The person(s) who performed the sampling and/or measurement;
- c. The dates and times the analyses were performed;
- d. The person(s) who performed the analyses; and,
- e. The results of each analysis.

3. Records Retention:

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recording from continuous monitoring instrumentation shall be retained for five (5) years. This period of retention shall be extended automatically during the course of any unresolved litigation regarding the regulated activity or regarding control standards applicable to the permittee, or as requested by the Department.

J. REPORTING

1. The permittee shall submit to the Department and landowners an annual operation report on or before February 1 of each year for the previous calendar year. The annual report shall be in a format acceptable to the Department. The annual operation report shall include the following:

- a. If no sludge is applied, the annual operation report shall consist of a letter to the Department by the permittee stating that no land application of sludge occurred in the previous calendar year and include information required in d., g., and i. below.
- b. The daily operational record (as specified in Part II, A.1);
- c. The weight (wet and dry tons) and volume of sludge utilized at the land application site;

- d. Any changes in ownership of the land where the operation is conducted or any change in any lease agreement for the use of such land that may affect or alter the operator's rights upon such land;
 - e. A chemical analysis of soil from each field for the constituents identified in Part I, F.4. The results shall be compared to the corresponding soils data submitted as a part of the Project Development Reports. The procedure for soil analysis shall be consistent with Department guidance;
 - f. Groundwater analysis from monitoring wells for the constituents identified in Part I, F.6.
 - g. Site maps of the same scale and contour interval as the maps submitted with the Project Development Reports, showing the boundaries within each field where sludge has been applied during the previous year;
 - h. For each site: the cropping scheme followed during the previous year and anticipated for the coming year; Crop yield data and an explanation of which portions of the plants were harvested; Results of plant tissue and grain analyses, if required; Identification of fields to be used during the coming year; Sludge application rates for the coming year based on nitrogen mineralization calculations from previous sludge application practices;
 - i. Any other information required by the Department.
2. Sludge analytical and stabilization process monitoring data obtained during the previous reporting period shall be summarized for each period and postmarked no later than the 28th day of the month following the completed reporting period. Signed copies of these, and all other reports required herein, shall be submitted to the Department at the following address:

DELAWARE DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENTAL CONTROL, DIVISION OF WATER RESOURCES, SURFACE WATER DISCHARGES SECTION, 89 KINGS HIGHWAY, DELAWARE 19901; TELEPHONE: (302) 739-9946

When submitting monitoring results, copies of the original laboratory sheets should be included. If more than one sample is analyzed during any month, a table showing the range of constituent concentration values shall be prepared and included with the submittal.

3. The permittee shall submit copies of all monitoring results required in condition J.2 above to the landowner of each site.
4. The permittee shall maintain monthly sludge inventory data. This data shall include at a minimum (a) the quantity of sludge generated, (b) quantity of sludge stored on site, and (c) quantity of sludge transported off site.

Transportation records shall include the date, quantity, carrier used, and the final destination of each shipment. The inventory data shall be maintained at the facility and be made available to the Department in accordance with Part I, I.3 of this permit.

5. Test Procedures

Test procedures for all analyses shall conform to the applicable test procedures identified in Part III, (B), Section 151 of the Department's Guidance and Regulations Governing the Land Treatment of Wastes, unless otherwise specified in this permit.

K. DEFINITIONS

1. "Agricultural Utilization" means the application rate of wastes or sludge or sludge products which shall not exceed the nutrient needs of the crop grown on the particular soil plus the other assimilative pathways in soils (e.g. immobilization with organic material, volatilization, and leachate in compliance with drinking water standards). This term may be used interchangeably with "agronomic rate".
2. "Composite" means a series of grab samples which have been collected in a manner such that the final sample is representative of the volume and characteristics of the material to be analyzed.
3. "Depth of Tillage" means the maximum depth at which sludge can be found after injection or incorporation into the soil.
4. "Feed crops" are crops produced primarily for consumption by animals.
5. "Fiber crops" are crops such as flax, cotton, and hemp.
6. "Food crops" are crops consumed by humans. These include, but are not limited to, fruits, vegetables, and tobacco.
7. "Land application" means the placement of sludge, treated sludge, or any other product containing these materials within 2 feet below the surface of land used to support vegetative growth.
8. "PFRP" means Process to Further Reduce Pathogens. This term means the same as Class A sludge or Class A biosolids.
9. "PSRP" means Process to Significantly Reduce Pathogens. This term means the same as Class B sludge.
10. "Sewage" means water-carried human or animal wastes from septic tanks, water closets, residences, buildings, industrial establishments, or other places, together with such groundwater infiltration, subsurface water, admixture of industrial wastes or other wastes as may be present.
11. "Sewage sludge" means sludge which derives in whole or in part from sewage.
12. "Sludge" means the accumulated semi-liquid suspension, settled solids, or dried residue of these solids that is deposited from (a) liquid waste in a municipal or industrial wastewater treatment plant, (b) surface or ground water treated in a water treatment plant, whether or not these solids have undergone treatment. Septage is included herein as sludge.
13. "Treatment" means a process which alters modifies or changes the biological, physical, or chemical characteristics of sludge or liquid waste.
14. "Vector Attraction" is the characteristic of sewage sludge that attracts rodent, flies, mosquitoes, or other organisms capable of transporting infectious agents.

Part II

A. MANAGEMENT REQUIREMENTS

1. Land Application of Sludge

The permittee shall prepare and maintain an operational record for each day that sludge is applied and when any other management activities are conducted at the land application sites. The daily operational record shall include the following:

- a. The date, type, and wet and dry weights of the sludge applied;
- b. The facility from which the sludge originated;
- c. A record of any major deviations from the operating plan;
- d. General daily weather conditions;
- e. The application rate for sludge;
- f. A map for each site showing the area of daily activity;
- g. A record of all actions taken to correct violations of the Delaware Environmental Protection Act and the Department's Regulations; and,
- h. Management undertaken, such as planting and harvesting of crops, fertilizers and chemicals added, irrigation frequency, techniques used, etc.

2. Change in Operation

The application of sludge to the sites authorized herein shall be consistent with the terms and conditions of this permit. The application of sludge at levels in excess of the amount necessary to provide plant available nitrogen for the crop being grown, in accordance with the limits identified in Part I, D of this permit, shall constitute a violation of the permit. Any anticipated facility expansion, production increase, or change in site conditions which would affect the land limiting constituent, create a new land limiting constituent, or adversely affect site conditions must be reported to the Department. Upon review of this information, the Department may invoke the provisions of Part II, B.6 of this permit.

3. Noncompliance Notification

The permittee shall report to the Department:

- a. In writing thirty (30) days before any planned physical alteration or addition to the permitted facilities or activities, if that alteration or addition would result in any significant change in information that was submitted during the permit application process;
- b. In writing thirty (30) days before any anticipated change which would result in noncompliance with any permit condition or Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes;
- c. Orally within twenty-four (24) hours from the time the permittee became aware of any noncompliance which may endanger the public health or the environment, at (800) 662-8802. In addition, a call must be placed at (302) 739-9946 during normal business hours, and;
- d. In writing as soon as possible but within five (5) days of the date the permittee knows or should know of any noncompliance unless extended by the Department;

This report shall contain:

- 1) A description of the noncompliance and its cause;
 - 2) The period of noncompliance including to the extent possible, times and dates and, if the noncompliance has not been corrected, the anticipated time it is expected to continue; and
 - 3) Steps taken or planned to reduce or eliminate reoccurrence of the noncompliance.
- e. In writing as soon as possible after the permittee becomes aware of relevant facts not submitted or incorrect information submitted, in a permit application or any report to the Department. Those facts or the correct information shall be included as a part of this report.

4. Minimize Impacts

The permittee shall take all necessary actions to eliminate and correct any adverse impact on the public health or the environment resulting from permit noncompliance.

B. RESPONSIBILITIES

1. Renewal Responsibilities

At least one hundred eighty (180) days before the expiration date of this permit,

the permittee shall submit a new application for a permit or notify the Department of the intent to cease operation by the expiration date. In the event that a timely and sufficient reapplication has been submitted and the Department is unable, through no fault of the permittee, to issue a new permit before the expiration date of this permit, the terms and conditions of this permit are automatically continued and remain fully effective and enforceable.

2. Entry and Access

The permittee shall allow the Department, consistent with 7 Del. C., Chapter 60, to:

- a. Enter the permitted facilities;
- b. Inspect any records that must be kept under this permit;
- c. Inspect any facility, equipment, practice, or operation permitted or required by this permit;
- d. Sample or monitor for the purpose of assuring permit compliance, any substance or any parameter at the facility or land application site.

3. Provide Information

The permittee shall furnish to the Department within a reasonable time, any information requested, including copies of records, which may be used by the Department to determine whether cause exists for modifying, revoking, reissuing, or terminating the permit, or to determine compliance with the permit or Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes.

4. Transfer of Ownership or Control

This permit may be transferable to a new owner or operator provided that the permittee notifies the Department by requesting a minor modification of the permit before the date of transfer and provided that the transferee shows evidence of a legal right to use the site and is otherwise in compliance with all applicable provisions of Part III, (B), of the Department's Guidance and Regulations Governing the Land Treatment of Wastes.

5. Operation of Facility

The permittee shall at all times properly maintain and operate all structures, systems, and equipment for treatment, control and monitoring, which are installed or used by the permittee to achieve compliance with this permit or Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes.

6. Permit Revocation and Modification

- a. After notice and opportunity for a hearing, this permit may be modified or revoked in whole or in part during its term for cause including, but not limited to, the following:

- 1) Violation of any terms or conditions of this permit;
- 2) Obtaining this permit by misrepresentation or failure to disclose fully all of the relevant facts;
- 3) Any change in operating conditions that requires either a temporary or permanent permit modification; or
- 4) If the Department finds that the public health, safety or welfare requires emergency action, the Department shall incorporate findings in support of such action in a written notice of emergency revocation issued to the permittee. Emergency revocation shall be effective upon receipt by the permittee. Thereafter, if requested by the permittee in writing, the Department shall provide the permittee a revocation hearing and prior notice thereof. Such hearings shall be conducted in accordance with 7 Del. C., Chapter 60.

- b. The Department may revoke this permit if the permittee violates any permit condition, any provisions of Part III, (B), of the Guidance and Regulations Governing the Land Treatment of Wastes, or fails to pay applicable Department fees.

7. Permit Closure Requirements

- a. All land approved for the Agricultural Utilization of Class B sludge is required to have a closure report when the land is no longer being utilized as described in the permit application when the permit expires. The report must be submitted to the Department within four (4) months of determination that the field(s) will no longer be utilized for sludge application. The closure report shall include the following:
 - 1) A letter from permittee stating the application site(s) (with tax parcel number(s)) that will no longer receive sludge approved by this Permit.
 - 2) A copy of the last sludge, septage and/or waste monitoring results as required in Part 1, F.1 of this permit.
 - 3) A copy of the last soil monitoring results as required in Part 1, F.4 of this permit. A soil test is required after the last land application of sludge, septage and/or waste.
 - 4) A copy of the last groundwater monitoring well results as required in Part I, F.6 of this permit. A groundwater test is required after the last land application of sludge, septage or waste.

8. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal

action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under 7 Del. C., Chapter 60.

9. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

11. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application or any provision of this permit to any circumstances is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

12. Compliance Required

The permittee shall comply with all conditions of the permit.

13. Reopener

In the event that the Part III, B, of the Guidance and Regulations Governing the Land Treatment of Wastes or applicable Federal Regulations are revised, this permit may be reopened and modified accordingly after notice and opportunity for a public hearing.

Part III

A. SPECIAL CONDITIONS

The permittee must ensure that the following conditions are met:

1. Monitoring wells
 - a. Groundwater shall be sampled at the following locations at the frequencies indicated.
 - 1) Groundwater shall be sampled per the frequency listed in Part I, F.6. at monitoring wells (DNREC ID) 246596, 246598, 246597, 246599, 246600, 256986, and 256994.
 - b. All monitoring wells samples shall be analyzed for the parameters listed in Part I, Subsection F.6.
 - c. Copies of the laboratory reports for all groundwater analytical data and the corresponding sampling logs shall be submitted to the Department within thirty days of receipt of the analytical data. In addition, the elevation of the top of the casing (TOC) for each monitoring well shall be surveyed in reference to a permanently marked, stationary point. After notice and opportunity for a hearing, the Department may modify the list of parameters specified above based on observations of groundwater quality trends in the area.
 - d. The monitoring frequency for groundwater will be increased to semi-annually at any of the above sites, when sludge is applied.
2. Only sludge that meets the requirements for stabilization and that has been processed to significantly reduce pathogens, by methods approved by the Department and as specified in this permit, may be land applied.
3. Sludge shall be transported to the land treatment sites in accordance with Delaware Non-Hazardous Waste Transporters Permit No. OH-11.
4. Pre-Start Up
 - a. Prior to the application of sludge, buffer zones, sensitive areas and the areas on which sludge is to be applied must be clearly marked with stakes, flags or other suitable markers acceptable to the Department.
 - b. The permittee must notify the Department at (302) 739-9946 at least two (2) working days prior to the application of sludge to any field.
 - c. Before the permittee can begin to apply sludge to the designated site, a pre start-up inspection may be conducted by the Department to verify that proper buffer zones and non-application areas are suitably marked.

Based on the results of the pre start-up inspection, the Department will either:

- 1) Grant approval for sludge application operations to begin or;
- 2) Require the permittee to perform additional site preparation (such work must be performed and approved prior to sludge application).

5. Application Measures

If at any time during the sludge application period the depth to groundwater is less than twenty (20) inches from the depth of tillage, all sludge application activities shall immediately cease and the Department shall be notified. Department approval is required before sludge application operations can continue.

6. Post Application Measures

- a. The facility must provide the Department with a crop plan for the year in which stabilized sludge are to be applied to lands specified in this permit. Any changes to the crop rotation plan must be approved by the Department prior to implementation.
- b. The Annual Report shall be submitted to the Department as required in Part I, J.1 of this permit. Should the permittee fail to supply the required documents on or before the deadline specified, the Department may revoke this permit.

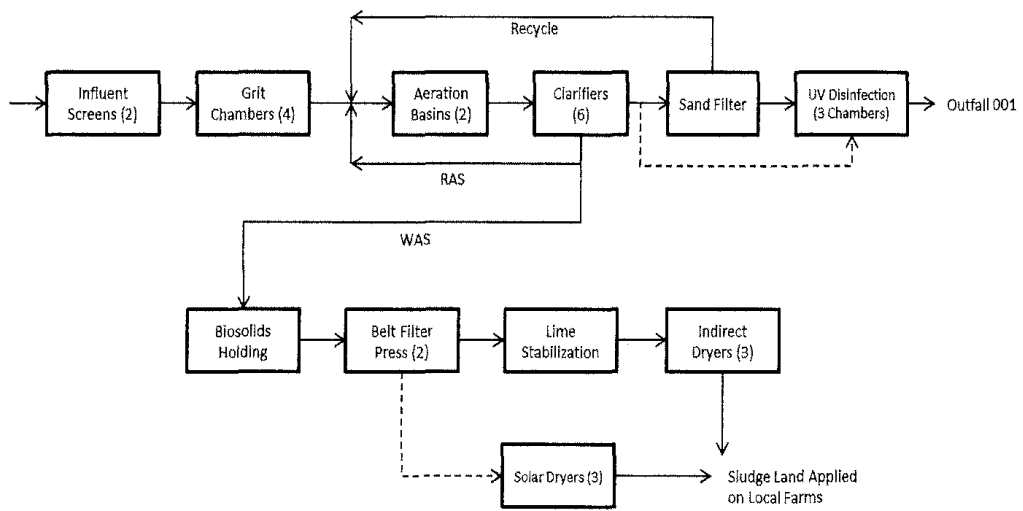
7. If, for any reason, any of the contracts or agreements specified in the Project Development Report any one of the approved sites is cancelled or amended, approval granted for use of that site shall be void.

- i) Kent County Sewer System and
- ii) Land-applied in accordance with AGU 2401-K-03 and AGU 2104-K-03 (and subsequent amendments) to the following tax parcels: Kent County Sludge Farm (KSF1) (5-00-142.00-01-55.00 and 5-00-142.00-01-20.00); Blessing Farm (KSF4) (5-00-172.00-01-69.00 and 5-00-172.00-01-33.00); Goldlinger Farm (KSF5) (1-00-038.00-01-02.00); and West Farm (5-08-141.00-01-01.00 and 5-08-141.00-01-3.00).

A. General Description of Discharges and Facilities (continued)

2. Process Diagram

The treatment of the wastewater includes fine screening, grit removal, influent sampling for process control, extended aeration with rolling oxic and anoxic zones for BNR, ferric chloride addition for phosphorous reduction, secondary clarification with six (6) clarifiers available, sand filter, ultra violet (UV) disinfection with twelve (12) UV channels available, effluent metering and monitoring. In addition, two lagoons with underdrain systems are used for the temporary storage of filter backwash wastewater (west lagoon) and grit (east lagoon).





ENVIROCORP LABORATORIES INC.

51 CLARK STREET, HARRINGTON, DE 19952
302-398-4313
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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER

Kent County Waste Treatment Facility

Project: Biosolids - Quarterly

139 Milford Neck Road

Project Number:

Milford, DE 19963

Reported: 01/28/2025 15:54

Analytical Results

Sample ID: Kentorganite **Sample Start:** 01/13/25 08:00
Lab ID: 2500297-01
Matrix: Solid **Received:** 01/13/25 10:38
Sample Type: Grab

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
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Microbiology

Salmonella	ND	#/4 g TS dry	1.26		EPA 1682	1/13/25 15:29	1/14/25 16:11	RD
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Inorganic

% Moisture	42.8	%	0.100		SM2540-G	1/14/25 12:40	1/14/25 12:40	HM
% Solids	57.2	%	0.100		SM2540-G	1/13/25 14:36	1/15/25 08:28	HM
Chloride	2000	mg/L	0.50		SM4500-Cl-C	1/21/25 14:33	1/21/25 14:35	MEM
Cyanide	0.270	mg/L	0.0572		SM4500-CN-E	1/16/25 12:51	1/17/25 11:15	JMW
Ammonia as N	0.05	% dry	0.003		SM4500-NH3-G	1/15/25 10:52	1/15/25 11:30	CK
Nitrite as N	0.0005	% dry	0.00009		SM4500-NO2-B	1/14/25 15:00	1/14/25 15:35	CK
Nitrate as N	ND	% dry	0.000175		[CALC]	1/15/25 10:52	1/15/25 11:31	CK
Nitrate+Nitrite as N	0.000612	% dry	0.0000874		SM4500-NO3-H	1/15/25 10:52	1/15/25 11:31	CK
Organic Nitrogen as N	1.98	% dry			[CALC]	1/20/25 14:55	1/20/25 15:30	CK
pH	12.38	SU			SM4500-H+/B	1/14/25 16:32	1/14/25 16:32	JB
Total Kjeldahl Nitrogen	2.03	% dry	0.035		SM4500-Norg-C	1/20/25 14:55	1/20/25 15:30	CK
Total Nitrogen as N	2.03	% dry			[CALC]	1/20/25 14:55	1/20/25 15:30	CK
Total Phosphorus as P	0.267	% dry	0.0349		SM4500-P-F	1/20/25 14:55	1/20/25 15:35	CK
Volatile Solids	13.9	%	0.100		EPA 160.4	1/13/25 14:36	1/15/25 15:14	HM

Metals

Silver	0.725	mg/kg dry	0.255		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW
Aluminum	2040	mg/kg dry	5.10		EPA 6010	1/21/25 9:00	1/21/25 13:22	JMW
Arsenic	5.06	mg/kg dry	0.510		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW
Cadmium	0.786	mg/kg dry	0.255		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW
Chromium	17.0	mg/kg dry	0.510		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW
Copper	142	mg/kg dry	0.510		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW
Iron	18700	mg/kg dry	5.10		EPA 6010	1/21/25 9:00	1/21/25 13:22	JMW
Potassium	0.322	% dry	0.0000510		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW
Molybdenum	5.47	mg/kg dry	0.510		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW
Sodium	689	mg/kg dry	0.510		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW
Nickel	9.08	mg/kg dry	0.510		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW
Lead	4.52	mg/kg dry	0.510		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW
Selenium	4.11	mg/kg dry	0.510		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW
Zinc	203	mg/kg dry	0.510		EPA 6010	1/21/25 9:00	1/21/25 13:18	JMW



ANALYTICAL RESULTS

Project: 2500297
Pace Project No.: 30749222

Sample: 2500297-01 **Lab ID: 30749222001** Collected: 01/13/25 08:00 Received: 01/16/25 10:30 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B Pace Analytical Services - Beaver								
Mercury	0.068	mg/kg	0.035	1	01/17/25 06:57	01/20/25 06:07	7439-97-6	
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546 Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	0.99	5	01/17/25 09:38	01/17/25 23:40	12674-11-2	ED,P1
PCB-1221 (Aroclor 1221)	ND	mg/kg	0.99	5	01/17/25 09:38	01/17/25 23:40	11104-28-2	ED,P1
PCB-1232 (Aroclor 1232)	ND	mg/kg	0.99	5	01/17/25 09:38	01/17/25 23:40	11141-16-5	ED,P1
PCB-1242 (Aroclor 1242)	ND	mg/kg	2.0	5	01/17/25 09:38	01/17/25 23:40	53469-21-9	ED,P1
PCB-1248 (Aroclor 1248)	ND	mg/kg	0.99	5	01/17/25 09:38	01/17/25 23:40	12672-29-6	ED,P1
PCB-1254 (Aroclor 1254)	ND	mg/kg	0.99	5	01/17/25 09:38	01/17/25 23:40	11097-69-1	ED,P1
PCB-1260 (Aroclor 1260)	ND	mg/kg	2.0	5	01/17/25 09:38	01/17/25 23:40	11096-82-5	ED,P1
PCB, Total	ND	mg/kg	0.99	5	01/17/25 09:38	01/17/25 23:40	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	74	%.	59-94	5	01/17/25 09:38	01/17/25 23:40	877-09-8	
Decachlorobiphenyl (S)	96	%.	73-118	5	01/17/25 09:38	01/17/25 23:40	2051-24-3	
Percent Moisture								
Analytical Method: SM 2540G-2015 Pace Analytical Services - Greensburg								
Percent Moisture	43.5	%	0.10	1		01/20/25 13:18		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2500297
Pace Project No.: 30749222

QC Batch: 721380 Analysis Method: EPA 7471B
QC Batch Method: EPA 7471B Analysis Description: BVR 7471B Mercury
Laboratory: Pace Analytical Services - Beaver
Associated Lab Samples: 30749222001

METHOD BLANK: 3512627 Matrix: Solid
Associated Lab Samples: 30749222001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	01/20/25 05:27	

LABORATORY CONTROL SAMPLE: 3512628

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.5	0.50	101	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3512629 3512630

Parameter	Units	30748460001		3512629		3512630		% Rec Limits	RPD	Max RPD	Qual	
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec					
Mercury	mg/kg	ND	0.64	0.64	0.61	0.58	94	90	80-120	5	20	

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QUALITY CONTROL DATA

Project: 2500297
Pace Project No.: 30749222

QC Batch: 721401 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30749222001

METHOD BLANK: 3512721 Matrix: Solid
Associated Lab Samples: 30749222001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.017	01/17/25 20:59	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.017	01/17/25 20:59	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.017	01/17/25 20:59	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	01/17/25 20:59	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.017	01/17/25 20:59	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.017	01/17/25 20:59	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	01/17/25 20:59	
Decachlorobiphenyl (S)	%	81	73-118	01/17/25 20:59	
Tetrachloro-m-xylene (S)	%	60	59-94	01/17/25 20:59	

LABORATORY CONTROL SAMPLE: 3512722

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.16	0.13	83	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.16	0.15	92	57-108	
Decachlorobiphenyl (S)	%			101	73-118	
Tetrachloro-m-xylene (S)	%			75	59-94	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3512723 3512724

Parameter	Units	30748406001		3512724		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.18	0.19	0.17	0.16	93	86	10-175	8	25
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.18	0.19	0.17	0.16	91	85	10-175	6	25
Decachlorobiphenyl (S)	%						98	91	73-118		
Tetrachloro-m-xylene (S)	%						86	80	59-94		

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QUALITY CONTROL DATA

Project: 2500297
Pace Project No.: 30749222

QC Batch: 721774 Analysis Method: SM 2540G-2015
QC Batch Method: SM 2540G-2015 Analysis Description: Dry Weight/Percent Moisture
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30749222001

SAMPLE DUPLICATE: 3514121

Parameter	Units	30749191001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	81.2	81.4	0	10	H3

SAMPLE DUPLICATE: 3514122

Parameter	Units	30749538001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	86.9	86.5	0	10	H3

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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER
Kent County Waste Treatment Facility
Project: Biosolids - Monthly

139 Milford Neck Road

Project Number:

Milford, DE 19963

Reported: 02/24/2025 11:56

Analytical Results

Sample ID:	Kentorganite	Sample Start:	02/03/25 07:30
Lab ID:	2500886-01	Received:	02/03/25 10:49
Matrix:	Solid		
Sample Type:	Grab		

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
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Microbiology

Salmonella	ND	#/4 g TS dry	1.36		EPA 1682	2/3/25 14:54	2/4/25 16:02	RD
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Inorganic

% Moisture	47.0	%	0.100		SM2540-G	2/4/25 13:40	2/4/25 13:40	HM
% Solids	53.0	%	0.100		SM2540-G	2/3/25 15:49	2/5/25 08:51	HM
Chloride	2040	mg/L	0.50		SM4500-Cl-C	2/14/25 15:08	2/14/25 16:04	MEM
Ammonia as N	0.05	% dry	0.002		SM4500-NH3-G	2/4/25 15:37	2/5/25 10:22	CK
Nitrite as N	0.0005	% dry	0.00009		SM4500-NO2-B	2/5/25 15:42	2/5/25 16:06	CK
Nitrate as N	ND	% dry	0.000189		[CALC]	2/5/25 15:42	2/5/25 16:06	CK
Nitrate+Nitrite as N	0.000680	% dry	0.0000944		SM4500-NO3-H	2/4/25 15:37	2/5/25 10:23	CK
Organic Nitrogen as N	1.39	% dry			[CALC]	2/11/25 10:25	2/11/25 13:02	CK
pH	12.57	SU			SM4500-H+/B	2/6/25 15:54	2/6/25 15:54	JB
Total Kjeldahl Nitrogen	1.44	% dry	0.038		SM4500-Norg-C	2/11/25 10:25	2/11/25 13:02	CK
Total Nitrogen as N	1.44	% dry			[CALC]	2/11/25 10:25	2/11/25 13:02	CK
Total Phosphorus as P	0.194	% dry	0.0378		SM4500-P-F	2/11/25 10:25	2/11/25 13:03	CK
Volatile Solids	13.2	%	0.100		EPA 160.4	2/3/25 15:49	2/6/25 10:44	HM

Metals

Aluminum	2680	mg/kg dry	5.05		EPA 6010	2/11/25 9:00	2/12/25 14:15	JMW
Arsenic	4.54	mg/kg dry	0.505		EPA 6010	2/11/25 9:00	2/12/25 14:12	JMW
Cadmium	0.682	mg/kg dry	0.253		EPA 6010	2/11/25 9:00	2/12/25 14:12	JMW
Chromium	16.5	mg/kg dry	0.505		EPA 6010	2/11/25 9:00	2/12/25 14:12	JMW
Copper	117	mg/kg dry	0.505		EPA 6010	2/11/25 9:00	2/12/25 14:12	JMW
Iron	19800	mg/kg dry	5.05		EPA 6010	2/11/25 9:00	2/12/25 14:15	JMW
Potassium	0.380	% dry	0.0000505		EPA 6010	2/11/25 9:00	2/12/25 14:12	JMW
Molybdenum	5.56	mg/kg dry	0.505		EPA 6010	2/11/25 9:00	2/12/25 14:12	JMW
Sodium	807	mg/kg dry	0.505		EPA 6010	2/11/25 9:00	2/12/25 14:12	JMW
Nickel	7.44	mg/kg dry	0.505		EPA 6010	2/11/25 9:00	2/12/25 14:12	JMW
Lead	3.39	mg/kg dry	0.505		EPA 6010	2/11/25 9:00	2/12/25 14:12	JMW
Selenium	0.905	mg/kg dry	0.505		EPA 6010	2/11/25 9:00	2/12/25 14:12	JMW
Zinc	196	mg/kg dry	0.505		EPA 6010	2/11/25 9:00	2/12/25 14:12	JMW

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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER

Kent County Waste Treatment Facility	Project: Biosolids - Monthly
139 Milford Neck Road	Project Number:
Milford, DE 19963	Reported: 02/24/2025 11:56

Quality Control

[TOC_1]Quality Assurance Results[TOC]

Inorganic

Analyte	Result	Qualifier	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: P5B0008 - Solids Preperation										
Duplicate (P5B0008-DUP1)			Source: 2500886-01		Prepared: 2/4/2025 Analyzed: 2/5/2025					
% Solids	54.3		0.100	%		53.0			2.45	20
% Moisture	45.7		0.100	%		47.0			2.84	200
Volatile Solids	13.1		0.100	%		13.2			0.515	200



ANALYTICAL RESULTS

Project: 2500886
Pace Project No.: 30753587

Sample: 2500886-01 **Lab ID: 30753587001** Collected: 02/03/25 07:30 Received: 02/05/25 10:10 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Comments: • Per client, CCE was sent elsewhere.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B Pace Analytical Services - Beaver								
Mercury	0.064	mg/kg	0.036	1	02/07/25 12:01	02/07/25 15:19	7439-97-6	
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546 Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	0.42	5	02/12/25 15:04	02/13/25 23:28	12674-11-2	ED,P1
PCB-1221 (Aroclor 1221)	ND	mg/kg	0.42	5	02/12/25 15:04	02/13/25 23:28	11104-28-2	ED,P1
PCB-1232 (Aroclor 1232)	ND	mg/kg	0.42	5	02/12/25 15:04	02/13/25 23:28	11141-16-5	ED,P1
PCB-1242 (Aroclor 1242)	ND	mg/kg	0.85	5	02/12/25 15:04	02/13/25 23:28	53469-21-9	ED,P1
PCB-1248 (Aroclor 1248)	ND	mg/kg	0.42	5	02/12/25 15:04	02/13/25 23:28	12672-29-6	ED,P1
PCB-1254 (Aroclor 1254)	ND	mg/kg	0.42	5	02/12/25 15:04	02/13/25 23:28	11097-69-1	ED,P1
PCB-1260 (Aroclor 1260)	ND	mg/kg	0.85	5	02/12/25 15:04	02/13/25 23:28	11096-82-5	ED,P1
PCB, Total	ND	mg/kg	0.42	5	02/12/25 15:04	02/13/25 23:28	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	95	%	59-94	5	02/12/25 15:04	02/13/25 23:28	877-09-8	ST
Decachlorobiphenyl (S)	126	%	73-118	5	02/12/25 15:04	02/13/25 23:28	2051-24-3	ST
Percent Moisture								
Analytical Method: SM 2540G-2015 Pace Analytical Services - Greensburg								
Percent Moisture	45.6	%	0.10	1		02/06/25 12:00		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2500886
 Pace Project No.: 30753587

QC Batch: 725442 Analysis Method: EPA 7471B
 QC Batch Method: EPA 7471B Analysis Description: BVR 7471B Mercury
 Laboratory: Pace Analytical Services - Beaver

Associated Lab Samples: 30753587001

METHOD BLANK: 3531365 Matrix: Solid
 Associated Lab Samples: 30753587001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	02/07/25 15:14	

LABORATORY CONTROL SAMPLE: 3531366

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.49	0.48	98	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3531367 3531368

Parameter	Units	30753587001		3531368		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
Mercury	mg/kg	0.064	0.92	0.84	0.79	85	80	80-120	6	20	

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QUALITY CONTROL DATA

Project: 2500886
Pace Project No.: 30753587

QC Batch: 726282 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30753587001

METHOD BLANK: 3535425 Matrix: Solid
Associated Lab Samples: 30753587001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.017	02/13/25 19:13	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.017	02/13/25 19:13	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.017	02/13/25 19:13	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	02/13/25 19:13	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.017	02/13/25 19:13	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.017	02/13/25 19:13	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	02/13/25 19:13	
Decachlorobiphenyl (S)	%	94	73-118	02/13/25 19:13	
Tetrachloro-m-xylene (S)	%	80	59-94	02/13/25 19:13	

LABORATORY CONTROL SAMPLE: 3535426

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.16	0.13	83	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.16	0.14	88	57-108	
Decachlorobiphenyl (S)	%			87	73-118	
Tetrachloro-m-xylene (S)	%			75	59-94	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3535427 3535428

Parameter	Units	30753648001		3535428		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.53	0.49	0.51	92	102	10-175	5	25	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.53	0.55	0.57	103	113	10-175	3	25	
Decachlorobiphenyl (S)	%					98	107	73-118			
Tetrachloro-m-xylene (S)	%					79	85	59-94			

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QUALITY CONTROL DATA

Project: 2500886
Pace Project No.: 30753587

QC Batch:	725213	Analysis Method:	SM 2540G-2015
QC Batch Method:	SM 2540G-2015	Analysis Description:	Dry Weight/Percent Moisture
		Laboratory:	Pace Analytical Services - Greensburg

Associated Lab Samples: 30753587001

SAMPLE DUPLICATE: 3529932

Parameter	Units	30753671001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	12.0	9.6	22	10	D6

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Report Number
25-037-0246

Account Number
27155

Send To: Envirocorp Inc
51 Clark Street
Harrington, DE 19952



2790 Whitten Road, Memphis, TN 38133
Main 901.213.2400 ° Fax 901.213.2440
www.waypointanalytical.com

Page: 1 of 1

Project: Subcontract Order#2500886

Purchase Order:

Report Date: 02/24/2025

Date Received: 02/06/2025

Date Sampled: 02/03/2025

REPORT OF ANALYSIS

Farm Name:

Lab Number: 87200

Sample ID: 2500886-01

Analysis	Result	Quantitation Limit	Method	Date and Time Test Started	Analyst
Neutralizing Value (%CCE) , %	76.2	0.1	AOAC 955.01	02/20/2025 14:00	DXT

Method Reference:

Official Methods of Analysis of AOAC International, 17th Edition, 1998

Comments:

A handwritten signature in black ink that reads "Connie Cook".

Connie Cook
Project Manager



ENVIROCORP LABORATORIES INC.

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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER

Kent County Waste Treatment Facility

Project: Biosolids - Monthly

139 Milford Neck Road

Project Number:

Milford, DE 19963

Reported: 03/20/2025 12:20

Analytical Results

Sample ID: Kentorganite **Sample Start:** 03/03/25 08:00
Lab ID: 2501801-01
Matrix: Solid **Received:** 03/03/25 10:22
Sample Type: Grab

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
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Microbiology

Salmonella	ND	#/4 g TS dry	1.30		EPA 1682	3/3/25 11:36	3/4/25 14:04	RD
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Inorganic

% Moisture	44.8	%	0.100		SM2540-G	3/4/25 9:17	3/4/25 09:17	HM
% Solids	55.2	%	0.100		SM2540-G	3/3/25 16:20	3/5/25 13:21	HM
Chloride	950	mg/L	0.50		SM4500-Cl-C	3/19/25 14:28	3/19/25 15:26	MEM
Ammonia as N	0.06	% dry	0.002		SM4500-NH3-G	3/6/25 10:13	3/6/25 11:26	CK
Nitrite as N	0.0006	% dry	0.00009		SM4500-NO2-B	3/5/25 16:13	3/5/25 16:18	CK
Nitrate as N	ND	% dry	0.000181		[CALC]	3/6/25 10:13	3/6/25 11:33	CK
Nitrate+Nitrite as N	0.000748	% dry	0.0000906		SM4500-NO3-H	3/6/25 10:13	3/6/25 11:33	CK
Organic Nitrogen as N	2.31	% dry			[CALC]	3/12/25 11:49	3/12/25 13:49	CK
pH	12.54	SU			SM4500-H+/B	3/4/25 16:34	3/4/25 16:34	JB
Total Kjeldahl Nitrogen	2.37	% dry	0.091		SM4500-Norg-C	3/12/25 11:49	3/12/25 13:49	CK
Total Nitrogen as N	2.37	% dry			[CALC]	3/12/25 11:49	3/12/25 13:49	CK
Total Phosphorus as P	0.545	% dry	0.0906		SM4500-P-F	3/12/25 11:49	3/12/25 14:04	CK
Volatile Solids	11.6	%	0.100		EPA 160.4	3/3/25 16:20	3/6/25 13:44	HM

Metals

Aluminum	1460	mg/kg dry	0.497		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW
Arsenic	4.33	mg/kg dry	0.497		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW
Cadmium	0.636	mg/kg dry	0.248		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW
Chromium	13.6	mg/kg dry	0.497		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW
Copper	67.0	mg/kg dry	0.497		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW
Iron	14000	mg/kg dry	4.97		EPA 6010	3/11/25 9:00	3/12/25 16:13	JMW
Potassium	0.337	% dry	0.0000497		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW
Molybdenum	4.52	mg/kg dry	0.497		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW
Sodium	553	mg/kg dry	0.497		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW
Nickel	1.81	mg/kg dry	0.497		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW
Lead	3.05	mg/kg dry	0.497		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW
Selenium	1.24	mg/kg dry	0.497		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW
Zinc	196	mg/kg dry	0.497		EPA 6010	3/11/25 9:00	3/11/25 15:57	JMW



ANALYTICAL RESULTS

Project: 2501801
Pace Project No.: 30760120

Sample: 2501801-01 **Lab ID: 30760120001** Collected: 03/03/25 08:00 Received: 03/04/25 09:45 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B Pace Analytical Services - Beaver								
Mercury	0.084	mg/kg	0.036	1	03/05/25 08:34	03/05/25 11:03	7439-97-6	
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546 Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	0.45	5	03/06/25 09:03	03/06/25 21:32	12674-11-2	ED,P1
PCB-1221 (Aroclor 1221)	ND	mg/kg	0.45	5	03/06/25 09:03	03/06/25 21:32	11104-28-2	ED,P1
PCB-1232 (Aroclor 1232)	ND	mg/kg	0.45	5	03/06/25 09:03	03/06/25 21:32	11141-16-5	ED,P1
PCB-1242 (Aroclor 1242)	ND	mg/kg	0.89	5	03/06/25 09:03	03/06/25 21:32	53469-21-9	ED,P1
PCB-1248 (Aroclor 1248)	ND	mg/kg	0.45	5	03/06/25 09:03	03/06/25 21:32	12672-29-6	ED,P1
PCB-1254 (Aroclor 1254)	ND	mg/kg	0.45	5	03/06/25 09:03	03/06/25 21:32	11097-69-1	ED,P1
PCB-1260 (Aroclor 1260)	ND	mg/kg	0.89	5	03/06/25 09:03	03/06/25 21:32	11096-82-5	ED,P1
PCB, Total	ND	mg/kg	0.45	5	03/06/25 09:03	03/06/25 21:32	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	91	%.	59-94	5	03/06/25 09:03	03/06/25 21:32	877-09-8	
Decachlorobiphenyl (S)	106	%.	73-118	5	03/06/25 09:03	03/06/25 21:32	2051-24-3	
Percent Moisture								
Analytical Method: SM 2540G-2015 Pace Analytical Services - Greensburg								
Percent Moisture	44.2	%	0.10	1		03/05/25 13:27		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2501801
Pace Project No.: 30760120

QC Batch: 730643 Analysis Method: EPA 7471B
QC Batch Method: EPA 7471B Analysis Description: BVR 7471B Mercury
Laboratory: Pace Analytical Services - Beaver

Associated Lab Samples: 30760120001

METHOD BLANK: 3556629 Matrix: Solid
Associated Lab Samples: 30760120001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	03/05/25 10:40	

LABORATORY CONTROL SAMPLE: 3556630

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.5	0.48	97	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3556631 3556632

Parameter	Units	30759671001		3556632		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual	
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result							
Mercury	mg/kg	ND	0.55	0.56	0.50	0.49	89	87	80-120	1	20	

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QUALITY CONTROL DATA

Project: 2501801
Pace Project No.: 30760120

QC Batch: 730919 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30760120001

METHOD BLANK: 3558324 Matrix: Solid
Associated Lab Samples: 30760120001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.017	03/06/25 19:33	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.017	03/06/25 19:33	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.017	03/06/25 19:33	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	03/06/25 19:33	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.017	03/06/25 19:33	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.017	03/06/25 19:33	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	03/06/25 19:33	
Decachlorobiphenyl (S)	%	74	73-118	03/06/25 19:33	
Tetrachloro-m-xylene (S)	%	73	59-94	03/06/25 19:33	

LABORATORY CONTROL SAMPLE: 3558325

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.16	0.14	83	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.16	0.14	83	57-108	
Decachlorobiphenyl (S)	%			77	73-118	
Tetrachloro-m-xylene (S)	%			76	59-94	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3558326 3558327

Parameter	Units	30760198001		3558327		MS % Rec	MSD % Rec	% Rec Limits	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result					
PCB-1016 (Aroclor 1016)	mg/kg	ND	1.2	0.98	0.85	83	83	10-175	15	25
PCB-1260 (Aroclor 1260)	mg/kg	ND	1.2	0.99	0.85	84	83	10-175	15	25
Decachlorobiphenyl (S)	%					81	80	73-118		
Tetrachloro-m-xylene (S)	%					75	74	59-94		

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QUALITY CONTROL DATA

Project: 2501801
Pace Project No.: 30760120

QC Batch: 730642 Analysis Method: SM 2540G-2015
QC Batch Method: SM 2540G-2015 Analysis Description: Dry Weight/Percent Moisture
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30760120001

SAMPLE DUPLICATE: 3556628

Parameter	Units	30759785001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	15.5	13.3	15	10	D6

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51 CLARK STREET, HARRINGTON, DE 19952
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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER

Kent County Waste Treatment Facility

Project: Biosolids - Annual

139 Milford Neck Road

Project Number:

Milford, DE 19963

Reported: 04/24/2025 11:05

Analytical Results

Sample ID: Kentorganite **Sample Start:** 04/07/25 07:30
Lab ID: 2503055-01
Matrix: Solid **Received:** 04/07/25 10:24
Sample Type: Grab

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
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Microbiology

Salmonella	ND	#/4 g TS dry	1.34		EPA 1682	4/7/25 15:26	4/8/25 17:08	RD
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Inorganic

% Moisture	46.1	%	0.100		SM2540-G	4/8/25 9:11	4/8/25 09:11	HM
% Solids	53.9	%	0.100		SM2540-G	4/7/25 15:04	4/8/25 15:45	HM
Chloride	2090	mg/L	0.50		SM4500-Cl-C	4/18/25 10:59	4/18/25 11:01	MEM
Cyanide	0.0560	mg/L	0.0539		SM4500-CN-E	4/11/25 13:02	4/15/25 16:12	JMW
Ammonia as N	0.13	% dry	0.004		SM4500-NH3-G	4/16/25 10:22	4/16/25 10:50	CK
Nitrite as N	0.0007	% dry	0.00009		SM4500-NO2-B	4/8/25 15:20	4/8/25 16:30	CK
Nitrate as N	ND	% dry	0.000185		[CALC]	4/16/25 10:22	4/16/25 11:10	CK
Nitrate+Nitrite as N	0.000853	% dry	0.0000927		SM4500-NO3-H	4/16/25 10:22	4/16/25 11:10	CK
Organic Nitrogen as N	1.71	% dry			[CALC]	4/17/25 9:55	4/17/25 14:31	CK
pH	12.49	SU			SM4500-H+/B	4/9/25 13:53	4/9/25 13:53	JB
Total Kjeldahl Nitrogen	1.84	% dry	0.037		SM4500-Norg-C	4/17/25 9:55	4/17/25 14:31	CK
Total Nitrogen as N	1.84	% dry			[CALC]	4/17/25 9:55	4/17/25 14:31	CK
Total Phosphorus as P	0.260	% dry	0.0371		SM4500-P-F	4/17/25 9:55	4/17/25 14:36	CK
Volatile Solids	12.4	%	0.100		EPA 160.4	4/7/25 15:04	4/10/25 12:00	HM

Metals

Silver	0.865	mg/kg dry	0.254		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Aluminum	2000	mg/kg dry	5.09		EPA 6010	4/15/25 9:00	4/15/25 15:04	JMW
Arsenic	6.79	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Beryllium	ND	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Cadmium	0.758	mg/kg dry	0.254		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Chromium	17.0	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Copper	71.8	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Iron	17800	mg/kg dry	5.09		EPA 6010	4/15/25 9:00	4/15/25 15:04	JMW
Potassium	0.350	% dry	0.0000509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Molybdenum	6.28	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Sodium	621	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Nickel	10.1	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Lead	4.20	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Antimony	3.28	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW

ENVIROCORP LABORATORIES INC.



51 CLARK STREET, HARRINGTON, DE 19952
 302-398-4313
 www.envirocorplabs.com



ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER

Kent County Waste Treatment Facility	Project: Biosolids - Annual
139 Milford Neck Road	Project Number:
Milford, DE 19963	Reported: 04/24/2025 11:05

Analytical Results

Sample ID: Kentorganite **Sample Start:** 04/07/25 07:30
Lab ID: 2503055-01
Matrix: Solid **Received:** 04/07/25 10:24
Sample Type: Grab

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
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Metals (Continued)

Selenium	6.23	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Thallium	1.37	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW
Zinc	217	mg/kg dry	0.509		EPA 6010	4/15/25 9:00	4/15/25 15:00	JMW



2790 Whitten Road, Memphis, TN 38133
 Main 901.213.2400 ° Fax 901.213.2440
 www.waypointanalytical.com

27155
 Envirocorp Inc
 51 Clark Street

Project Kentorganite
 Information : Sub-Contract Order 2503055

Report Date : 04/15/2025
 Received : 04/08/2025

Harrington , DE 19952

Connie Cook

Report Number : **25-098-0091**

REPORT OF ANALYSIS

Connie Cook
 Project Manager

Lab No : **85730**

Matrix: **Solids**

Sample ID : **2503055-01**

Sampled: **4/7/2025 07:30**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Neutralizing Value (%CCE)	57.4	%	0.1	1	04/15/25 10:30	DXT	AOAC 955.01

**Qualifiers/
 Definitions**

DF

Dilution Factor

MQL

Method Quantitation Limit



ANALYTICAL RESULTS

Project: 2503055
 Pace Project No.: 30770088

Sample: 2503055-01 Lab ID: 30770088001 Collected: 04/07/25 07:30 Received: 04/09/25 10:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B								
Pace Analytical Services - Beaver								
Mercury	0.11	mg/kg	0.038	1	04/11/25 05:27	04/11/25 09:23	7439-97-6	
8081B GCS Pesticides								
Analytical Method: EPA 8081B Preparation Method: EPA 3546								
Pace Analytical Services - Greensburg								
Aldrin	ND	mg/kg	0.32	100	04/10/25 08:49	04/11/25 10:31	309-00-2	ED
alpha-BHC	ND	mg/kg	0.32	100	04/10/25 08:49	04/11/25 10:31	319-84-6	ED
beta-BHC	ND	mg/kg	0.32	100	04/10/25 08:49	04/11/25 10:31	319-85-7	ED,ML
delta-BHC	ND	mg/kg	0.32	100	04/10/25 08:49	04/11/25 10:31	319-86-8	ED
gamma-BHC (Lindane)	ND	mg/kg	0.32	100	04/10/25 08:49	04/11/25 10:31	58-89-9	ED,ML
alpha-Chlordane	ND	mg/kg	0.32	100	04/10/25 08:49	04/11/25 10:31	5103-71-9	ED,ML
gamma-Chlordane	ND	mg/kg	0.32	100	04/10/25 08:49	04/11/25 10:31	5103-74-2	ED,MH
4,4'-DDD	ND	mg/kg	0.64	100	04/10/25 08:49	04/11/25 10:31	72-54-8	ED,ML
4,4'-DDE	ND	mg/kg	0.64	100	04/10/25 08:49	04/11/25 10:31	72-55-9	ED
4,4'-DDT	ND	mg/kg	0.64	100	04/10/25 08:49	04/11/25 10:31	50-29-3	ED
Dieldrin	ND	mg/kg	0.64	100	04/10/25 08:49	04/11/25 10:31	60-57-1	ED
Endosulfan I	ND	mg/kg	0.32	100	04/10/25 08:49	04/11/25 10:31	959-98-8	ED,ML
Endosulfan II	ND	mg/kg	0.64	100	04/10/25 08:49	04/11/25 10:31	33213-65-9	ED
Endosulfan sulfate	ND	mg/kg	0.64	100	04/10/25 08:49	04/11/25 10:31	1031-07-8	ED,MH
Endrin	ND	mg/kg	0.64	100	04/10/25 08:49	04/11/25 10:31	72-20-8	ED
Endrin aldehyde	ND	mg/kg	0.64	100	04/10/25 08:49	04/11/25 10:31	7421-93-4	ED,ML
Endrin ketone	ND	mg/kg	0.64	100	04/10/25 08:49	04/11/25 10:31	53494-70-5	ED,ML
Heptachlor	ND	mg/kg	0.32	100	04/10/25 08:49	04/11/25 10:31	76-44-8	ED,ML
Heptachlor epoxide	ND	mg/kg	0.32	100	04/10/25 08:49	04/11/25 10:31	1024-57-3	ED
Methoxychlor	ND	mg/kg	3.2	100	04/10/25 08:49	04/11/25 10:31	72-43-5	ED,ML
Toxaphene	ND	mg/kg	3.2	100	04/10/25 08:49	04/11/25 10:31	8001-35-2	ED
Surrogates								
Tetrachloro-m-xylene (S)	117	%	44-102	100	04/10/25 08:49	04/11/25 10:31	877-09-8	S4
Decachlorobiphenyl (S)	175	%	41-108	100	04/10/25 08:49	04/11/25 10:31	2051-24-3	S4
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546								
Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	0.16	5	04/10/25 08:49	04/10/25 20:13	12674-11-2	ED
PCB-1221 (Aroclor 1221)	ND	mg/kg	0.16	5	04/10/25 08:49	04/10/25 20:13	11104-28-2	ED
PCB-1232 (Aroclor 1232)	ND	mg/kg	0.16	5	04/10/25 08:49	04/10/25 20:13	11141-16-5	ED
PCB-1242 (Aroclor 1242)	ND	mg/kg	0.32	5	04/10/25 08:49	04/10/25 20:13	53469-21-9	ED
PCB-1248 (Aroclor 1248)	ND	mg/kg	0.16	5	04/10/25 08:49	04/10/25 20:13	12672-29-6	ED
PCB-1254 (Aroclor 1254)	ND	mg/kg	0.16	5	04/10/25 08:49	04/10/25 20:13	11097-69-1	ED
PCB-1260 (Aroclor 1260)	ND	mg/kg	0.32	5	04/10/25 08:49	04/10/25 20:13	11096-82-5	ED
PCB, Total	ND	mg/kg	0.16	5	04/10/25 08:49	04/10/25 20:13	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	62	%	59-94	5	04/10/25 08:49	04/10/25 20:13	877-09-8	
Decachlorobiphenyl (S)	83	%	73-118	5	04/10/25 08:49	04/10/25 20:13	2051-24-3	

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: 2503055
 Pace Project No.: 30770088

Sample: 2503055-01 Lab ID: 30770088001 Collected: 04/07/25 07:30 Received: 04/09/25 10:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8270D MSSV Microwave		Analytical Method: EPA 8270D Preparation Method: EPA 3546 Pace Analytical Services - Greensburg						
Acenaphthene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	83-32-9	ED
Acenaphthylene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	208-96-8	ED
Anthracene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	120-12-7	ED
Azobenzene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	103-33-3	ED
Benzo(a)anthracene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	56-55-3	ED
Benzo(a)pyrene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	50-32-8	ED
Benzo(b)fluoranthene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	205-99-2	ED
Benzo(g,h,i)perylene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	191-24-2	ED
Benzo(k)fluoranthene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	207-08-9	ED
Benzoic acid	ND	mg/kg	95.3	10	04/14/25 08:51	04/15/25 20:26	65-85-0	ED
Benzyl alcohol	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	100-51-6	ED
4-Bromophenylphenyl ether	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	101-55-3	ED
Butylbenzylphthalate	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	85-68-7	ED
Carbazole	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	86-74-8	ED
4-Chloro-3-methylphenol	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	59-50-7	ED
4-Chloroaniline	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	106-47-8	ED
bis(2-Chloroethoxy)methane	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	111-91-1	ED
bis(2-Chloroethyl) ether	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	111-44-4	ED
bis(2-Chloroisopropyl) ether	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	108-60-1	ED
2-Chloronaphthalene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	91-58-7	ED
2-Chlorophenol	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	95-57-8	ED
4-Chlorophenylphenyl ether	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	7005-72-3	ED
Chrysene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	218-01-9	ED
Dibenz(a,h)anthracene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	53-70-3	ED
Dibenzofuran	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	132-64-9	ED
1,2-Dichlorobenzene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	95-50-1	ED
1,3-Dichlorobenzene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	541-73-1	ED
1,4-Dichlorobenzene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	106-46-7	ED
3,3'-Dichlorobenzidine	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	91-94-1	CH,ED, L1
2,4-Dichlorophenol	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	120-83-2	ED
Diethylphthalate	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	84-66-2	ED
2,4-Dimethylphenol	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	105-67-9	ED
Dimethylphthalate	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	131-11-3	ED
Di-n-butylphthalate	ND	mg/kg	50.9	10	04/14/25 08:51	04/15/25 20:26	84-74-2	ED
4,6-Dinitro-2-methylphenol	ND	mg/kg	15.9	10	04/14/25 08:51	04/15/25 20:26	534-52-1	ED
2,4-Dinitrophenol	ND	mg/kg	15.9	10	04/14/25 08:51	04/15/25 20:26	51-28-5	CH,ED
2,4-Dinitrotoluene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	121-14-2	ED
2,6-Dinitrotoluene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	606-20-2	ED
Di-n-octylphthalate	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	117-84-0	CH,ED
bis(2-Ethylhexyl)phthalate	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	117-81-7	ED
Fluoranthene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	206-44-0	ED
Fluorene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	86-73-7	ED
Hexachloro-1,3-butadiene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	87-68-3	ED
Hexachlorobenzene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	118-74-1	ED

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: 2503055
 Pace Project No.: 30770088

Sample: 2503055-01 Lab ID: 30770088001 Collected: 04/07/25 07:30 Received: 04/09/25 10:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8270D MSSV Microwave								
Analytical Method: EPA 8270D Preparation Method: EPA 3546								
Pace Analytical Services - Greensburg								
Hexachlorocyclopentadiene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	77-47-4	ED
Hexachloroethane	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	67-72-1	ED
Indeno(1,2,3-cd)pyrene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	193-39-5	ED
Isophorone	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	78-59-1	ED
1-Methylnaphthalene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	90-12-0	ED
2-Methylnaphthalene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	91-57-6	ED
2-Methylphenol(o-Cresol)	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	95-48-7	ED
3&4-Methylphenol(m&p Cresol)	ND	mg/kg	12.7	10	04/14/25 08:51	04/15/25 20:26		ED
Naphthalene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	91-20-3	ED
2-Nitroaniline	ND	mg/kg	15.9	10	04/14/25 08:51	04/15/25 20:26	88-74-4	ED
3-Nitroaniline	ND	mg/kg	15.9	10	04/14/25 08:51	04/15/25 20:26	99-09-2	ED
4-Nitroaniline	ND	mg/kg	15.9	10	04/14/25 08:51	04/15/25 20:26	100-01-6	ED, L1
Nitrobenzene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	98-95-3	ED
2-Nitrophenol	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	88-75-5	ED
4-Nitrophenol	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	100-02-7	ED
N-Nitrosodimethylamine	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	62-75-9	ED
N-Nitroso-di-n-propylamine	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	621-64-7	ED
N-Nitrosodiphenylamine	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	86-30-6	ED
Pentachlorophenol	ND	mg/kg	15.9	10	04/14/25 08:51	04/15/25 20:26	87-86-5	ED
Phenanthrene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	85-01-8	ED
Phenol	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	108-95-2	ED
Pyrene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	129-00-0	ED
1,2,4-Trichlorobenzene	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	120-82-1	ED
2,4,5-Trichlorophenol	ND	mg/kg	15.9	10	04/14/25 08:51	04/15/25 20:26	95-95-4	ED
2,4,6-Trichlorophenol	ND	mg/kg	6.4	10	04/14/25 08:51	04/15/25 20:26	88-06-2	ED
Surrogates								
Nitrobenzene-d5 (S)	0	%	32-154	10	04/14/25 08:51	04/15/25 20:26	4165-60-0	S4
2-Fluorobiphenyl (S)	17	%	50-144	10	04/14/25 08:51	04/15/25 20:26	321-60-8	S4
Terphenyl-d14 (S)	35	%	57-146	10	04/14/25 08:51	04/15/25 20:26	1718-51-0	S4
Phenol-d6 (S)	73	%	54-121	10	04/14/25 08:51	04/15/25 20:26	13127-88-3	S4
2-Fluorophenol (S)	0	%	57-124	10	04/14/25 08:51	04/15/25 20:26	367-12-4	S4
2,4,6-Tribromophenol (S)	0	%	44-127	10	04/14/25 08:51	04/15/25 20:26	118-79-6	S4

8260C MSV 5035 Med Level

Analytical Method: EPA 8260C Preparation Method: EPA 5035A/5030B
 Pace Analytical Services - Greensburg

Acetone	17.0	mg/kg	6.4	1	04/16/25 15:37	04/16/25 20:17	67-64-1	1c,2c
Benzene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	71-43-2	1c,2c
Bromochloromethane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	74-97-5	1c,2c
Bromodichloromethane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	75-27-4	1c,2c
Bromoform	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	75-25-2	1c,2c
Bromomethane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	74-83-9	1c,2c
TOTAL BTEX	ND	mg/kg	3.8	1	04/16/25 15:37	04/16/25 20:17		
2-Butanone (MEK)	2.6	mg/kg	1.3	1	04/16/25 15:37	04/16/25 20:17	78-93-3	1c,2c
Carbon disulfide	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	75-15-0	1c,2c
Carbon tetrachloride	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	56-23-5	1c,2c

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: 2503055
 Pace Project No.: 30770088

Sample: 2503055-01 Lab ID: 30770088001 Collected: 04/07/25 07:30 Received: 04/09/25 10:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260C MSV 5035 Med Level		Analytical Method: EPA 8260C Preparation Method: EPA 5035A/5030B Pace Analytical Services - Greensburg						
Chlorobenzene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	108-90-7	1c,2c
Chloroethane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	75-00-3	1c,2c
Chloroform	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	67-66-3	1c,2c
Chloromethane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	74-87-3	1c,2c
Dibromochloromethane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	124-48-1	1c,2c
1,2-Dichlorobenzene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	95-50-1	1c,2c
1,3-Dichlorobenzene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	541-73-1	1c,2c
1,4-Dichlorobenzene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	106-46-7	1c,2c
1,1-Dichloroethane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	75-34-3	1c,2c
1,2-Dichloroethane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	107-06-2	1c,2c
1,2-Dichloroethene (Total)	ND	mg/kg	1.3	1	04/16/25 15:37	04/16/25 20:17	540-59-0	
1,1-Dichloroethene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	75-35-4	1c,2c
cis-1,2-Dichloroethene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	156-59-2	1c,2c
trans-1,2-Dichloroethene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	156-60-5	1c,2c
1,2-Dichloropropane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	78-87-5	1c,2c
cis-1,3-Dichloropropene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	10061-01-5	1c,2c
trans-1,3-Dichloropropene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	10061-02-6	1c,2c
Ethylbenzene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	100-41-4	1c,2c
2-Hexanone	ND	mg/kg	1.3	1	04/16/25 15:37	04/16/25 20:17	591-78-6	1c,2c
Isopropylbenzene (Cumene)	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	98-82-8	1c,2c
Methylene Chloride	2.5	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	75-09-2	1c,2c
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	1.3	1	04/16/25 15:37	04/16/25 20:17	108-10-1	1c,2c
Methyl-tert-butyl ether	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	1634-04-4	1c,2c
Naphthalene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	91-20-3	1c,2c
Styrene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	100-42-5	1c,2c
1,1,2,2-Tetrachloroethane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	79-34-5	1c,2c
Tetrachloroethene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	127-18-4	1c,2c
Toluene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	108-88-3	1c,2c
1,2,4-Trichlorobenzene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	120-82-1	1c,2c
1,1,1-Trichloroethane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	71-55-6	1c,2c
1,1,2-Trichloroethane	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	79-00-5	1c,2c
Trichloroethene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	79-01-6	1c,2c
1,2,4-Trimethylbenzene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	95-63-6	1c,2c
1,3,5-Trimethylbenzene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	108-67-8	1c,2c
Vinyl chloride	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	75-01-4	1c,2c
Xylene (Total)	ND	mg/kg	1.9	1	04/16/25 15:37	04/16/25 20:17	1330-20-7	
m&p-Xylene	ND	mg/kg	1.3	1	04/16/25 15:37	04/16/25 20:17	179601-23-1	1c,2c
o-Xylene	ND	mg/kg	0.64	1	04/16/25 15:37	04/16/25 20:17	95-47-6	1c,2c
Surrogates								
Toluene-d8 (S)	96	%	70-130	1	04/16/25 15:37	04/16/25 20:17	2037-26-5	
4-Bromofluorobenzene (S)	99	%	70-130	1	04/16/25 15:37	04/16/25 20:17	460-00-4	
1,2-Dichloroethane-d4 (S)	95	%	70-130	1	04/16/25 15:37	04/16/25 20:17	17060-07-0	
Dibromofluoromethane (S)	88	%	70-130	1	04/16/25 15:37	04/16/25 20:17	1868-53-7	

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ANALYTICAL RESULTS

Project: 2503055
 Pace Project No.: 30770088

Sample: 2503055-01 **Lab ID: 30770088001** Collected: 04/07/25 07:30 Received: 04/09/25 10:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
Percent Moisture								
Analytical Method: SM 2540G-2015 Pace Analytical Services - Greensburg								
Percent Moisture	48.1	%	0.10	1		04/10/25 16:00		
Phenolics, Total Recoverable								
Analytical Method: EPA 9065 Preparation Method: EPA 9065 Pace Analytical Services - Greensburg								
Phenolics, Total Recoverable	ND	mg/kg	2.1	1	04/10/25 13:11	04/10/25 13:38	64743-03-9	

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QUALITY CONTROL DATA

Project: 2503055
Pace Project No.: 30770088

QC Batch: 738900 Analysis Method: EPA 7471B
QC Batch Method: EPA 7471B Analysis Description: BVR 7471B Mercury
Laboratory: Pace Analytical Services - Beaver

Associated Lab Samples: 30770088001

METHOD BLANK: 3596649 Matrix: Solid
Associated Lab Samples: 30770088001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	04/11/25 08:48	

LABORATORY CONTROL SAMPLE: 3596650

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.5	0.48	98	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3596651 3596652

Parameter	Units	30770502001		3596652		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual	
		Result	MS Spike Conc.	MSD Spike Conc.	MS Result							MSD Result
Mercury	mg/kg	0.055	0.71	0.71	0.66	0.75	84	98	80-120	14	20	

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QUALITY CONTROL DATA

Project: 2503055
Pace Project No.: 30770088

QC Batch: 739910 Analysis Method: EPA 8260C
QC Batch Method: EPA 5035A/5030B Analysis Description: 8260C MSV 5035 Med Level
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30770088001

METHOD BLANK: 3601063 Matrix: Solid
Associated Lab Samples: 30770088001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/kg	ND	0.25	04/16/25 12:55	
1,1,2,2-Tetrachloroethane	mg/kg	ND	0.25	04/16/25 12:55	
1,1,2-Trichloroethane	mg/kg	ND	0.25	04/16/25 12:55	
1,1-Dichloroethane	mg/kg	ND	0.25	04/16/25 12:55	
1,1-Dichloroethene	mg/kg	ND	0.25	04/16/25 12:55	
1,2,4-Trichlorobenzene	mg/kg	ND	0.25	04/16/25 12:55	
1,2,4-Trimethylbenzene	mg/kg	ND	0.25	04/16/25 12:55	
1,2-Dichlorobenzene	mg/kg	ND	0.25	04/16/25 12:55	
1,2-Dichloroethane	mg/kg	ND	0.25	04/16/25 12:55	
1,2-Dichloroethene (Total)	mg/kg	ND	0.50	04/16/25 12:55	
1,2-Dichloropropane	mg/kg	ND	0.25	04/16/25 12:55	
1,3,5-Trimethylbenzene	mg/kg	ND	0.25	04/16/25 12:55	
1,3-Dichlorobenzene	mg/kg	ND	0.25	04/16/25 12:55	
1,4-Dichlorobenzene	mg/kg	ND	0.25	04/16/25 12:55	
2-Butanone (MEK)	mg/kg	ND	0.50	04/16/25 12:55	
2-Hexanone	mg/kg	ND	0.50	04/16/25 12:55	
4-Methyl-2-pentanone (MIBK)	mg/kg	ND	0.50	04/16/25 12:55	
Acetone	mg/kg	ND	2.5	04/16/25 12:55	
Benzene	mg/kg	ND	0.25	04/16/25 12:55	
Bromochloromethane	mg/kg	ND	0.25	04/16/25 12:55	
Bromodichloromethane	mg/kg	ND	0.25	04/16/25 12:55	
Bromoform	mg/kg	ND	0.25	04/16/25 12:55	
Bromomethane	mg/kg	ND	0.25	04/16/25 12:55	
Carbon disulfide	mg/kg	ND	0.25	04/16/25 12:55	
Carbon tetrachloride	mg/kg	ND	0.25	04/16/25 12:55	
Chlorobenzene	mg/kg	ND	0.25	04/16/25 12:55	
Chloroethane	mg/kg	ND	0.25	04/16/25 12:55	
Chloroform	mg/kg	ND	0.25	04/16/25 12:55	
Chloromethane	mg/kg	ND	0.25	04/16/25 12:55	
cis-1,2-Dichloroethene	mg/kg	ND	0.25	04/16/25 12:55	
cis-1,3-Dichloropropene	mg/kg	ND	0.25	04/16/25 12:55	
Dibromochloromethane	mg/kg	ND	0.25	04/16/25 12:55	
Ethylbenzene	mg/kg	ND	0.25	04/16/25 12:55	
Isopropylbenzene (Cumene)	mg/kg	ND	0.25	04/16/25 12:55	
m&p-Xylene	mg/kg	ND	0.50	04/16/25 12:55	
Methyl-tert-butyl ether	mg/kg	ND	0.25	04/16/25 12:55	
Methylene Chloride	mg/kg	ND	0.25	04/16/25 12:55	
Naphthalene	mg/kg	ND	0.25	04/16/25 12:55	
o-Xylene	mg/kg	ND	0.25	04/16/25 12:55	
Styrene	mg/kg	ND	0.25	04/16/25 12:55	

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QUALITY CONTROL DATA

Project: 2503055
 Pace Project No.: 30770088

METHOD BLANK: 3601063 Matrix: Solid
 Associated Lab Samples: 30770088001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Tetrachloroethene	mg/kg	ND	0.25	04/16/25 12:55	
Toluene	mg/kg	ND	0.25	04/16/25 12:55	
TOTAL BTEX	mg/kg	ND	1.5	04/16/25 12:55	
trans-1,2-Dichloroethene	mg/kg	ND	0.25	04/16/25 12:55	
trans-1,3-Dichloropropene	mg/kg	ND	0.25	04/16/25 12:55	
Trichloroethene	mg/kg	ND	0.25	04/16/25 12:55	
Vinyl chloride	mg/kg	ND	0.25	04/16/25 12:55	
Xylene (Total)	mg/kg	ND	0.75	04/16/25 12:55	
1,2-Dichloroethane-d4 (S)	%	102	70-130	04/16/25 12:55	
4-Bromofluorobenzene (S)	%	97	70-130	04/16/25 12:55	
Dibromofluoromethane (S)	%	95	70-130	04/16/25 12:55	
Toluene-d8 (S)	%	98	70-130	04/16/25 12:55	

LABORATORY CONTROL SAMPLE: 3601064

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/kg	1	0.92	92	70-130	
1,1,2,2-Tetrachloroethane	mg/kg	1	0.77	77	54-130	
1,1,2-Trichloroethane	mg/kg	1	0.83	83	60-130	
1,1-Dichloroethane	mg/kg	1	0.88	88	58-130	
1,1-Dichloroethene	mg/kg	1	0.91	91	44-130	
1,2,4-Trichlorobenzene	mg/kg	1	0.91	91	51-130	
1,2,4-Trimethylbenzene	mg/kg	1	0.93	93	62-130	
1,2-Dichlorobenzene	mg/kg	1	0.88	88	58-130	
1,2-Dichloroethane	mg/kg	1	0.83	83	56-130	
1,2-Dichloroethene (Total)	mg/kg	2	1.7	85	56-130	
1,2-Dichloropropane	mg/kg	1	0.87	87	59-130	
1,3,5-Trimethylbenzene	mg/kg	1	0.94	94	62-130	
1,3-Dichlorobenzene	mg/kg	1	0.86	86	58-130	
1,4-Dichlorobenzene	mg/kg	1	0.93	93	56-130	
2-Butanone (MEK)	mg/kg	1	0.87	87	36-130	
2-Hexanone	mg/kg	1	0.86	86	45-130	
4-Methyl-2-pentanone (MIBK)	mg/kg	1	0.90	90	41-130	
Acetone	mg/kg	1	ND	124	10-175	
Benzene	mg/kg	1	0.90	90	63-130	
Bromochloromethane	mg/kg	1	0.91	91	59-130	
Bromodichloromethane	mg/kg	1	0.82	82	59-130	
Bromoform	mg/kg	1	0.80	80	43-130	
Bromomethane	mg/kg	1	0.92	92	42-130	
Carbon disulfide	mg/kg	1	1.1	106	35-135	
Carbon tetrachloride	mg/kg	1	0.96	96	48-130	
Chlorobenzene	mg/kg	1	0.89	89	62-130	
Chloroethane	mg/kg	1	1.1	106	43-136	
Chloroform	mg/kg	1	0.86	86	58-130	

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QUALITY CONTROL DATA

Project: 2503055
 Pace Project No.: 30770088

LABORATORY CONTROL SAMPLE: 3601064

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloromethane	mg/kg	1	1.1	106	44-130	
cis-1,2-Dichloroethene	mg/kg	1	0.86	86	56-130	
cis-1,3-Dichloropropene	mg/kg	1	0.83	83	56-130	
Dibromochloromethane	mg/kg	1	0.82	82	50-130	
Ethylbenzene	mg/kg	1	0.90	90	63-130	
Isopropylbenzene (Cumene)	mg/kg	1	0.96	96	57-137	
m&p-Xylene	mg/kg	2	1.8	91	65-130	
Methyl-tert-butyl ether	mg/kg	1	0.93	93	55-130	
Methylene Chloride	mg/kg	1	0.69	69	32-136	
Naphthalene	mg/kg	1	0.86	86	43-145	
o-Xylene	mg/kg	1	0.88	88	65-130	
Styrene	mg/kg	1	0.85	85	60-130	
Tetrachloroethene	mg/kg	1	0.96	96	52-130	
Toluene	mg/kg	1	0.90	90	59-130	
TOTAL BTEX	mg/kg	6	5.4	90	51-123	
trans-1,2-Dichloroethene	mg/kg	1	0.84	84	53-130	
trans-1,3-Dichloropropene	mg/kg	1	0.78	78	55-130	
Trichloroethene	mg/kg	1	0.93	93	55-130	
Vinyl chloride	mg/kg	1	0.96	96	46-130	
Xylene (Total)	mg/kg	3	2.7	90	65-130	
1,2-Dichloroethane-d4 (S)	%			105	70-130	
4-Bromofluorobenzene (S)	%			100	70-130	
Dibromofluoromethane (S)	%			103	70-130	
Toluene-d8 (S)	%			99	70-130	

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QUALITY CONTROL DATA

Project: 2503055
 Pace Project No.: 30770088

QC Batch: 738595 Analysis Method: EPA 8081B
 QC Batch Method: EPA 3546 Analysis Description: 8081 GCS Pesticides
 Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30770088001

METHOD BLANK: 3595042 Matrix: Solid
 Associated Lab Samples: 30770088001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
4,4'-DDD	mg/kg	ND	0.0033	04/11/25 10:08	
4,4'-DDE	mg/kg	ND	0.0033	04/11/25 10:08	
4,4'-DDT	mg/kg	ND	0.0033	04/11/25 10:08	
Aldrin	mg/kg	ND	0.0016	04/11/25 10:08	
alpha-BHC	mg/kg	ND	0.0016	04/11/25 10:08	
alpha-Chlordane	mg/kg	ND	0.0016	04/11/25 10:08	
beta-BHC	mg/kg	ND	0.0016	04/11/25 10:08	
delta-BHC	mg/kg	ND	0.0016	04/11/25 10:08	
Dieldrin	mg/kg	ND	0.0033	04/11/25 10:08	
Endosulfan I	mg/kg	ND	0.0016	04/11/25 10:08	
Endosulfan II	mg/kg	ND	0.0033	04/11/25 10:08	
Endosulfan sulfate	mg/kg	ND	0.0033	04/11/25 10:08	
Endrin	mg/kg	ND	0.0033	04/11/25 10:08	
Endrin aldehyde	mg/kg	ND	0.0033	04/11/25 10:08	
Endrin ketone	mg/kg	ND	0.0033	04/11/25 10:08	
gamma-BHC (Lindane)	mg/kg	ND	0.0016	04/11/25 10:08	
gamma-Chlordane	mg/kg	ND	0.0016	04/11/25 10:08	
Heptachlor	mg/kg	ND	0.0016	04/11/25 10:08	
Heptachlor epoxide	mg/kg	ND	0.0016	04/11/25 10:08	
Methoxychlor	mg/kg	ND	0.016	04/11/25 10:08	
Toxaphene	mg/kg	ND	0.016	04/11/25 10:08	
Decachlorobiphenyl (S)	%	74	41-108	04/11/25 10:08	
Tetrachloro-m-xylene (S)	%	58	44-102	04/11/25 10:08	

LABORATORY CONTROL SAMPLE: 3595043

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
4,4'-DDD	mg/kg	0.027	0.023	87	53-108	
4,4'-DDE	mg/kg	0.027	0.022	83	57-104	
4,4'-DDT	mg/kg	0.027	0.023	86	53-120	
Aldrin	mg/kg	0.013	0.0099	75	55-99	
alpha-BHC	mg/kg	0.013	0.0099	74	51-98	
alpha-Chlordane	mg/kg	0.013	0.010	75	54-99	
beta-BHC	mg/kg	0.013	0.010	79	55-99	
delta-BHC	mg/kg	0.013	0.011	81	24-129	
Dieldrin	mg/kg	0.027	0.022	82	58-103	
Endosulfan I	mg/kg	0.013	0.010	76	51-94	
Endosulfan II	mg/kg	0.027	0.021	80	55-97	
Endosulfan sulfate	mg/kg	0.027	0.026	98	59-102	

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QUALITY CONTROL DATA

Project: 2503055
Pace Project No.: 30770088

LABORATORY CONTROL SAMPLE: 3595043

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Endrin	mg/kg	0.027	0.022	81	57-104	
Endrin aldehyde	mg/kg	0.027	0.018	68	34-93	
Endrin ketone	mg/kg	0.027	0.022	84	58-99	
gamma-BHC (Lindane)	mg/kg	0.013	0.010	76	54-96	
gamma-Chlordane	mg/kg	0.013	0.010	76	55-99	
Heptachlor	mg/kg	0.013	0.0099	74	55-96	
Heptachlor epoxide	mg/kg	0.013	0.0099	74	54-96	
Methoxychlor	mg/kg	0.13	0.12	90	57-120	
Decachlorobiphenyl (S)	%			88	41-108	
Tetrachloro-m-xylene (S)	%			68	44-102	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3595044 3595045

Parameter	Units	30770088001		MS		MSD		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		Result	Conc.	Spike Conc.	Spike Conc.	Result	Result						
4,4'-DDD	mg/kg	ND	0.05	0.05	ND	ND	41	18	31-123		25	ML	
4,4'-DDE	mg/kg	ND	0.05	0.05	ND	.064J	87	104	10-144		25		
4,4'-DDT	mg/kg	ND	0.05	0.05	ND	ND	62	52	10-175		25		
Aldrin	mg/kg	ND	0.025	0.025	ND	ND	24	46	10-175		25		
alpha-BHC	mg/kg	ND	0.025	0.025	ND	ND	57	33	24-132		25		
alpha-Chlordane	mg/kg	ND	0.025	0.025	ND	.062J	-33	107	19-134		25	ML	
beta-BHC	mg/kg	ND	0.025	0.025	ND	ND	-165	-188	10-167		25	ML	
delta-BHC	mg/kg	ND	0.025	0.025	ND	ND	34	49	10-152		25		
Dieldrin	mg/kg	ND	0.05	0.05	.084J	.065J	73	34	10-164		25		
Endosulfan I	mg/kg	ND	0.025	0.025	ND	ND	4	-29	10-169		25	ML	
Endosulfan II	mg/kg	ND	0.05	0.05	ND	ND	29	24	24-119		25		
Endosulfan sulfate	mg/kg	ND	0.05	0.05	ND	ND	166	137	17-130		25	MH	
Endrin	mg/kg	ND	0.05	0.05	ND	ND	54	44	10-171		25		
Endrin aldehyde	mg/kg	ND	0.05	0.05	ND	ND	-45	-57	10-114		25	ML	
Endrin ketone	mg/kg	ND	0.05	0.05	ND	ND	0	0	15-129		25	ML	
gamma-BHC (Lindane)	mg/kg	ND	0.025	0.025	ND	ND	29	-36	10-139		25	ML	
gamma-Chlordane	mg/kg	ND	0.025	0.025	ND	ND	134	166	20-134		25	MH	
Heptachlor	mg/kg	ND	0.025	0.025	ND	ND	3	-28	10-144		25	ML	
Heptachlor epoxide	mg/kg	ND	0.025	0.025	ND	ND	90	35	10-153		25		
Methoxychlor	mg/kg	ND	0.25	0.25	ND	ND	40	-26	10-155		25	ML	
Decachlorobiphenyl (S)	%						138	79	41-108			S4	
Tetrachloro-m-xylene (S)	%						107	113	44-102			S4	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2503055
 Pace Project No.: 30770088

QC Batch: 738601 Analysis Method: EPA 8082A
 QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
 Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30770088001

METHOD BLANK: 3595064 Matrix: Solid
 Associated Lab Samples: 30770088001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.016	04/10/25 19:05	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.016	04/10/25 19:05	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.016	04/10/25 19:05	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	04/10/25 19:05	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.016	04/10/25 19:05	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.016	04/10/25 19:05	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	04/10/25 19:05	
Decachlorobiphenyl (S)	%	79	73-118	04/10/25 19:05	
Tetrachloro-m-xylene (S)	%	67	59-94	04/10/25 19:05	

LABORATORY CONTROL SAMPLE: 3595065

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.17	0.14	84	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.17	0.15	89	57-108	
Decachlorobiphenyl (S)	%			99	73-118	
Tetrachloro-m-xylene (S)	%			81	59-94	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3595288 3595289

Parameter	Units	30770169002		3595289		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual	
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result							
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.19	0.18	2.0	0.26	1100	145	10-175	154	25	E,MH,R1
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.19	0.18	0.36	0.26	197	147	10-175	31	25	MH,R1
Decachlorobiphenyl (S)	%						127	106	73-118			ST
Tetrachloro-m-xylene (S)	%						132	97	59-94			ST

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QUALITY CONTROL DATA

Project: 2503055
 Pace Project No.: 30770088

QC Batch: 739306 Analysis Method: EPA 8270D
 QC Batch Method: EPA 3546 Analysis Description: 8270D Solid MSSV Microwave
 Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30770088001

METHOD BLANK: 3598354 Matrix: Solid
 Associated Lab Samples: 30770088001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,2,4-Trichlorobenzene	mg/kg	ND	0.33	04/15/25 14:16	
1,2-Dichlorobenzene	mg/kg	ND	0.33	04/15/25 14:16	
1,3-Dichlorobenzene	mg/kg	ND	0.33	04/15/25 14:16	
1,4-Dichlorobenzene	mg/kg	ND	0.33	04/15/25 14:16	
1-Methylnaphthalene	mg/kg	ND	0.33	04/15/25 14:16	
2,4,5-Trichlorophenol	mg/kg	ND	0.83	04/15/25 14:16	
2,4,6-Trichlorophenol	mg/kg	ND	0.33	04/15/25 14:16	
2,4-Dichlorophenol	mg/kg	ND	0.33	04/15/25 14:16	
2,4-Dimethylphenol	mg/kg	ND	0.33	04/15/25 14:16	
2,4-Dinitrophenol	mg/kg	ND	0.83	04/15/25 14:16	CH
2,4-Dinitrotoluene	mg/kg	ND	0.33	04/15/25 14:16	
2,6-Dinitrotoluene	mg/kg	ND	0.33	04/15/25 14:16	
2-Chloronaphthalene	mg/kg	ND	0.33	04/15/25 14:16	
2-Chlorophenol	mg/kg	ND	0.33	04/15/25 14:16	
2-Methylnaphthalene	mg/kg	ND	0.33	04/15/25 14:16	
2-Methylphenol(o-Cresol)	mg/kg	ND	0.33	04/15/25 14:16	
2-Nitroaniline	mg/kg	ND	0.83	04/15/25 14:16	
2-Nitrophenol	mg/kg	ND	0.33	04/15/25 14:16	
3&4-Methylphenol(m&p Cresol)	mg/kg	ND	0.67	04/15/25 14:16	
3,3'-Dichlorobenzidine	mg/kg	ND	0.33	04/15/25 14:16	CH
3-Nitroaniline	mg/kg	ND	0.83	04/15/25 14:16	
4,6-Dinitro-2-methylphenol	mg/kg	ND	0.83	04/15/25 14:16	
4-Bromophenylphenyl ether	mg/kg	ND	0.33	04/15/25 14:16	
4-Chloro-3-methylphenol	mg/kg	ND	0.33	04/15/25 14:16	
4-Chloroaniline	mg/kg	ND	0.33	04/15/25 14:16	
4-Chlorophenylphenyl ether	mg/kg	ND	0.33	04/15/25 14:16	
4-Nitroaniline	mg/kg	ND	0.83	04/15/25 14:16	
4-Nitrophenol	mg/kg	ND	0.33	04/15/25 14:16	
Acenaphthene	mg/kg	ND	0.33	04/15/25 14:16	
Acenaphthylene	mg/kg	ND	0.33	04/15/25 14:16	
Anthracene	mg/kg	ND	0.33	04/15/25 14:16	
Azobenzene	mg/kg	ND	0.33	04/15/25 14:16	
Benzo(a)anthracene	mg/kg	ND	0.33	04/15/25 14:16	
Benzo(a)pyrene	mg/kg	ND	0.33	04/15/25 14:16	
Benzo(b)fluoranthene	mg/kg	ND	0.33	04/15/25 14:16	
Benzo(g,h,i)perylene	mg/kg	ND	0.33	04/15/25 14:16	
Benzo(k)fluoranthene	mg/kg	ND	0.33	04/15/25 14:16	
Benzoic acid	mg/kg	ND	5.0	04/15/25 14:16	
Benzyl alcohol	mg/kg	ND	0.33	04/15/25 14:16	
bis(2-Chloroethoxy)methane	mg/kg	ND	0.33	04/15/25 14:16	

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QUALITY CONTROL DATA

Project: 2503055
 Pace Project No.: 30770088

METHOD BLANK: 3598354 Matrix: Solid
 Associated Lab Samples: 30770088001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
bis(2-Chloroethyl) ether	mg/kg	ND	0.33	04/15/25 14:16	
bis(2-Chloroisopropyl) ether	mg/kg	ND	0.33	04/15/25 14:16	
bis(2-Ethylhexyl)phthalate	mg/kg	ND	0.33	04/15/25 14:16	
Butylbenzylphthalate	mg/kg	ND	0.33	04/15/25 14:16	
Carbazole	mg/kg	ND	0.33	04/15/25 14:16	
Chrysene	mg/kg	ND	0.33	04/15/25 14:16	
Di-n-butylphthalate	mg/kg	ND	2.7	04/15/25 14:16	
Di-n-octylphthalate	mg/kg	ND	0.33	04/15/25 14:16	CH
Dibenz(a,h)anthracene	mg/kg	ND	0.33	04/15/25 14:16	
Dibenzofuran	mg/kg	ND	0.33	04/15/25 14:16	
Diethylphthalate	mg/kg	ND	0.33	04/15/25 14:16	
Dimethylphthalate	mg/kg	ND	0.33	04/15/25 14:16	
Fluoranthene	mg/kg	ND	0.33	04/15/25 14:16	
Fluorene	mg/kg	ND	0.33	04/15/25 14:16	
Hexachloro-1,3-butadiene	mg/kg	ND	0.33	04/15/25 14:16	
Hexachlorobenzene	mg/kg	ND	0.33	04/15/25 14:16	
Hexachlorocyclopentadiene	mg/kg	ND	0.33	04/15/25 14:16	
Hexachloroethane	mg/kg	ND	0.33	04/15/25 14:16	
Indeno(1,2,3-cd)pyrene	mg/kg	ND	0.33	04/15/25 14:16	
Isophorone	mg/kg	ND	0.33	04/15/25 14:16	
N-Nitroso-di-n-propylamine	mg/kg	ND	0.33	04/15/25 14:16	
N-Nitrosodimethylamine	mg/kg	ND	0.33	04/15/25 14:16	
N-Nitrosodiphenylamine	mg/kg	ND	0.33	04/15/25 14:16	
Naphthalene	mg/kg	ND	0.33	04/15/25 14:16	
Nitrobenzene	mg/kg	ND	0.33	04/15/25 14:16	
Pentachlorophenol	mg/kg	ND	0.83	04/15/25 14:16	
Phenanthrene	mg/kg	ND	0.33	04/15/25 14:16	
Phenol	mg/kg	ND	0.33	04/15/25 14:16	
Pyrene	mg/kg	ND	0.33	04/15/25 14:16	
2,4,6-Tribromophenol (S)	%	95	44-127	04/15/25 14:16	
2-Fluorobiphenyl (S)	%	94	50-144	04/15/25 14:16	
2-Fluorophenol (S)	%	91	57-124	04/15/25 14:16	
Nitrobenzene-d5 (S)	%	89	32-154	04/15/25 14:16	
Phenol-d6 (S)	%	89	54-121	04/15/25 14:16	
Terphenyl-d14 (S)	%	114	57-146	04/15/25 14:16	

LABORATORY CONTROL SAMPLE: 3598355

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,2,4-Trichlorobenzene	mg/kg	3.3	3.2	97	63-112	
1,2-Dichlorobenzene	mg/kg	3.3	3.0	92	63-108	
1,3-Dichlorobenzene	mg/kg	3.3	3.1	94	63-108	
1,4-Dichlorobenzene	mg/kg	3.3	2.8	85	58-107	
1-Methylnaphthalene	mg/kg	3.3	3.3	100	65-114	

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QUALITY CONTROL DATA

Project: 2503055
 Pace Project No.: 30770088

LABORATORY CONTROL SAMPLE: 3598355

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
2,4,5-Trichlorophenol	mg/kg	3.3	3.4	102	64-127	
2,4,6-Trichlorophenol	mg/kg	3.3	3.6	109	64-129	
2,4-Dichlorophenol	mg/kg	3.3	3.4	103	63-120	
2,4-Dimethylphenol	mg/kg	3.3	3.4	102	62-120	
2,4-Dinitrophenol	mg/kg	3.3	3.7	111	43-149	CH
2,4-Dinitrotoluene	mg/kg	3.3	3.7	113	63-133	
2,6-Dinitrotoluene	mg/kg	3.3	3.7	110	62-122	
2-Chloronaphthalene	mg/kg	3.3	3.3	99	63-117	
2-Chlorophenol	mg/kg	3.3	3.1	94	64-116	
2-Methylnaphthalene	mg/kg	3.3	3.4	102	65-111	
2-Methylphenol(o-Cresol)	mg/kg	3.3	3.2	97	65-121	
2-Nitroaniline	mg/kg	3.3	3.6	109	65-128	
2-Nitrophenol	mg/kg	3.3	3.4	103	63-126	
3&4-Methylphenol(m&p Cresol)	mg/kg	6.6	6.6	99	65-121	
3,3'-Dichlorobenzidine	mg/kg	3.3	4.2	125	50-124	CH,L1
3-Nitroaniline	mg/kg	3.3	3.7	110	51-120	
4,6-Dinitro-2-methylphenol	mg/kg	3.3	4.2	127	59-152	
4-Bromophenylphenyl ether	mg/kg	3.3	3.5	104	63-124	
4-Chloro-3-methylphenol	mg/kg	3.3	3.7	110	66-126	
4-Chloroaniline	mg/kg	3.3	2.6	78	46-107	
4-Chlorophenylphenyl ether	mg/kg	3.3	3.5	106	63-121	
4-Nitroaniline	mg/kg	3.3	6.8	206	43-162	E,L1
4-Nitrophenol	mg/kg	3.3	4.1	122	56-148	
Acenaphthene	mg/kg	3.3	3.5	105	64-116	
Acenaphthylene	mg/kg	3.3	3.4	103	68-117	
Anthracene	mg/kg	3.3	3.5	106	65-120	
Azobenzene	mg/kg	3.3	3.3	101	60-121	
Benzo(a)anthracene	mg/kg	3.3	3.8	113	70-124	
Benzo(a)pyrene	mg/kg	3.3	3.7	110	69-128	
Benzo(b)fluoranthene	mg/kg	3.3	3.4	104	60-137	
Benzo(g,h,i)perylene	mg/kg	3.3	4.0	121	65-132	
Benzo(k)fluoranthene	mg/kg	3.3	3.8	115	63-125	
Benzoic acid	mg/kg	3.3	2.9J	86	29-168	
Benzyl alcohol	mg/kg	3.3	3.4	102	43-130	
bis(2-Chloroethoxy)methane	mg/kg	3.3	3.2	95	64-115	
bis(2-Chloroethyl) ether	mg/kg	3.3	3.0	91	61-117	
bis(2-Chloroisopropyl) ether	mg/kg	3.3	3.0	91	53-123	
bis(2-Ethylhexyl)phthalate	mg/kg	3.3	4.1	124	65-132	
Butylbenzylphthalate	mg/kg	3.3	4.0	121	66-135	
Carbazole	mg/kg	3.3	3.4	103	65-117	
Chrysene	mg/kg	3.3	3.6	109	69-118	
Di-n-butylphthalate	mg/kg	3.3	3.8	113	54-142	
Di-n-octylphthalate	mg/kg	3.3	4.3	129	59-144	CH
Dibenz(a,h)anthracene	mg/kg	3.3	4.0	120	65-138	
Dibenzofuran	mg/kg	3.3	3.5	106	65-117	
Diethylphthalate	mg/kg	3.3	3.7	111	62-124	
Dimethylphthalate	mg/kg	3.3	3.6	108	61-122	

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QUALITY CONTROL DATA

Project: 2503055
 Pace Project No.: 30770088

LABORATORY CONTROL SAMPLE: 3598355

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Fluoranthene	mg/kg	3.3	3.8	113	67-124	
Fluorene	mg/kg	3.3	3.6	108	67-119	
Hexachloro-1,3-butadiene	mg/kg	3.3	3.3	99	61-113	
Hexachlorobenzene	mg/kg	3.3	3.5	106	63-124	
Hexachlorocyclopentadiene	mg/kg	3.3	3.4	103	62-129	
Hexachloroethane	mg/kg	3.3	2.8	84	63-109	
Indeno(1,2,3-cd)pyrene	mg/kg	3.3	4.0	121	63-134	
Isophorone	mg/kg	3.3	3.3	100	64-115	
N-Nitroso-di-n-propylamine	mg/kg	3.3	3.1	93	62-119	
N-Nitrosodimethylamine	mg/kg	3.3	3.2	96	61-114	
N-Nitrosodiphenylamine	mg/kg	3.3	3.5	105	61-121	
Naphthalene	mg/kg	3.3	3.3	98	66-112	
Nitrobenzene	mg/kg	3.3	3.2	96	63-114	
Pentachlorophenol	mg/kg	3.3	3.6	108	67-157	
Phenanthrene	mg/kg	3.3	3.5	106	67-122	
Phenol	mg/kg	3.3	3.2	97	64-123	
Pyrene	mg/kg	3.3	3.7	111	66-123	
2,4,6-Tribromophenol (S)	%			107	44-127	
2-Fluorobiphenyl (S)	%			101	50-144	
2-Fluorophenol (S)	%			100	57-124	
Nitrobenzene-d5 (S)	%			95	32-154	
Phenol-d6 (S)	%			97	54-121	
Terphenyl-d14 (S)	%			113	57-146	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3598356 3598357

Parameter	Units	MS		MSD		MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		30771080001 Result	Spike Conc.	Spike Conc.	Conc.								
1,2,4-Trichlorobenzene	mg/kg	ND	4.5	4.3	4.9	4.7	111	108	52-126	4	25		
1,2-Dichlorobenzene	mg/kg	ND	4.5	4.3	4.5	3.9J	102	90	56-120		25		
1,3-Dichlorobenzene	mg/kg	ND	4.5	4.3	4.3J	3.7J	97	85	55-121		25		
1,4-Dichlorobenzene	mg/kg	ND	4.5	4.3	4.1J	3.6J	92	83	53-118		25		
1-Methylnaphthalene	mg/kg	ND	4.5	4.3	5.4	5.1	121	117	55-126	5	25		
2,4,5-Trichlorophenol	mg/kg	ND	4.5	4.3	5.8J	5.1J	131	117	42-139		25		
2,4,6-Trichlorophenol	mg/kg	ND	4.5	4.3	5.5	5.4	125	124	30-156	2	25		
2,4-Dichlorophenol	mg/kg	ND	4.5	4.3	5.4	5.0	123	113	50-127	9	25		
2,4-Dimethylphenol	mg/kg	ND	4.5	4.3	4.7	4.3J	106	99	47-128		25		
2,4-Dinitrophenol	mg/kg	ND	4.5	4.3	ND	ND	0	0	10-175		25	CH,ML	
2,4-Dinitrotoluene	mg/kg	ND	4.5	4.3	5.7	5.4	129	123	48-135	6	25		
2,6-Dinitrotoluene	mg/kg	ND	4.5	4.3	5.8	5.3	131	120	54-122	9	25	MH	
2-Chloronaphthalene	mg/kg	ND	4.5	4.3	5.4	5.1	121	117	48-135	5	25		
2-Chlorophenol	mg/kg	ND	4.5	4.3	4.9	4.3J	111	99	54-128		25		
2-Methylnaphthalene	mg/kg	ND	4.5	4.3	5.5	5.1	125	117	54-121	7	25	MH	
2-Methylphenol(o-Cresol)	mg/kg	ND	4.5	4.3	4.9	ND	112	100	56-129		25		
2-Nitroaniline	mg/kg	ND	4.5	4.3	5.5J	5J	125	115	53-133		25		

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QUALITY CONTROL DATA

Project: 2503055
 Pace Project No.: 30770088

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3598356 3598357												
Parameter	Units	MS		MSD		MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	Max RPD	Qual
		30771080001 Result	Spike Conc.	Spike Conc.	MS Result							
2-Nitrophenol	mg/kg	ND	4.5	4.3	4.5	4.1J	101	94	31-146		25	
3&4-Methylphenol(m&p Cresol)	mg/kg	ND	8.8	8.8	10.5	9.4	119	107	58-128	11	25	
3,3'-Dichlorobenzidine	mg/kg	ND	4.5	4.3	6.8	6.5	154	148	10-159	6	25	CH
3-Nitroaniline	mg/kg	ND	4.5	4.3	6.1J	5.3J	139	122	42-121		25	MH
4,6-Dinitro-2-methylphenol	mg/kg	ND	4.5	4.3	ND	ND	23	0	10-175		25	ML
4-Bromophenylphenyl ether	mg/kg	ND	4.5	4.3	6.1	5.6	138	128	57-130	9	25	MH
4-Chloro-3-methylphenol	mg/kg	ND	4.5	4.3	5.7	5.2	129	118	58-132	10	25	
4-Chloroaniline	mg/kg	ND	4.5	4.3	4.1J	3.6J	93	83	28-112		25	
4-Chlorophenylphenyl ether	mg/kg	ND	4.5	4.3	6.0	5.6	136	129	56-129	7	25	MH
4-Nitroaniline	mg/kg	ND	4.5	4.3	ND	ND	51	52	28-175		25	
4-Nitrophenol	mg/kg	ND	4.5	4.3	5.4	5.4	122	123	14-164	0	25	
Acenaphthene	mg/kg	ND	4.5	4.3	5.8	5.4	131	123	53-133	7	25	
Acenaphthylene	mg/kg	ND	4.5	4.3	5.5	5.4	125	123	53-133	2	25	
Anthracene	mg/kg	ND	4.5	4.3	6.0	5.6	137	127	50-133	8	25	MH
Azobenzene	mg/kg	ND	4.5	4.3	5.8	5.4	132	123	60-120	8	25	MH
Benzo(a)anthracene	mg/kg	ND	4.5	4.3	6.1	5.7	138	131	42-149	6	25	
Benzo(a)pyrene	mg/kg	ND	4.5	4.3	6.0	5.4	137	123	55-133	11	25	MH
Benzo(b)fluoranthene	mg/kg	ND	4.5	4.3	6.2	5.4	138	122	51-144	13	25	
Benzo(g,h,i)perylene	mg/kg	ND	4.5	4.3	3.3J	2.5J	75	58	10-147		25	
Benzo(k)fluoranthene	mg/kg	ND	4.5	4.3	6.4	6.2	143	140	43-147	3	25	
Benzoic acid	mg/kg	ND	4.5	4.3	ND	ND	64	55	10-175		25	
Benzyl alcohol	mg/kg	ND	4.5	4.3	5.4	4.6	122	105	23-145	16	25	
bis(2-Chloroethoxy)methane	mg/kg	ND	4.5	4.3	5.1	4.8	115	110	57-124	6	25	
bis(2-Chloroethyl) ether	mg/kg	ND	4.5	4.3	4.2J	3.8J	96	87	61-117		25	
bis(2-Chloroisopropyl) ether	mg/kg	ND	4.5	4.3	4.6	4.3J	105	97	54-127		25	
bis(2-Ethylhexyl)phthalate	mg/kg	ND	4.5	4.3	7.1	6.5	160	148	56-149	9	25	MH
Butylbenzylphthalate	mg/kg	ND	4.5	4.3	6.9	6.3	155	145	60-149	8	25	MH
Carbazole	mg/kg	ND	4.5	4.3	6.4	5.9	145	135	53-130	8	25	MH
Chrysene	mg/kg	ND	4.5	4.3	6.2	5.7	141	131	36-149	9	25	
Di-n-butylphthalate	mg/kg	ND	4.5	4.3	ND	ND	149	138	56-138		25	MH
Di-n-octylphthalate	mg/kg	ND	4.5	4.3	8.3	7.8	187	177	36-175	6	25	CH,MH
Dibenz(a,h)anthracene	mg/kg	ND	4.5	4.3	4J	3J	90	68	21-142		25	
Dibenzofuran	mg/kg	ND	4.5	4.3	5.8	5.4	132	123	54-131	8	25	MH
Diethylphthalate	mg/kg	ND	4.5	4.3	6.0	5.5	136	126	56-130	9	25	MH
Dimethylphthalate	mg/kg	ND	4.5	4.3	5.8	5.5	131	126	54-131	5	25	
Fluoranthene	mg/kg	ND	4.5	4.3	6.3	6.0	142	138	17-174	4	25	
Fluorene	mg/kg	ND	4.5	4.3	5.9	5.7	133	131	54-135	3	25	
Hexachloro-1,3-butadiene	mg/kg	ND	4.5	4.3	5.2	4.7	117	107	51-126	10	25	
Hexachlorobenzene	mg/kg	ND	4.5	4.3	6.3	5.8	142	132	55-131	9	25	MH
Hexachlorocyclopentadiene	mg/kg	ND	4.5	4.3	2.4J	2.2J	54	50	10-155		25	
Hexachloroethane	mg/kg	ND	4.5	4.3	4.1J	3.7J	94	85	50-120		25	
Indeno(1,2,3-cd)pyrene	mg/kg	ND	4.5	4.3	3.9J	3.2J	89	74	20-139		25	
Isophorone	mg/kg	ND	4.5	4.3	5.2	4.8	118	109	57-119	9	25	
N-Nitroso-di-n-propylamine	mg/kg	ND	4.5	4.3	5.1	4.4	114	102	61-122	13	25	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2503055
 Pace Project No.: 30770088

Parameter	Units	30771080001		3598356		3598357		% Rec	% Rec	% Rec	Limits	RPD	Max RPD	Qual
		Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec							
N-Nitrosodimethylamine	mg/kg	ND	4.5	4.3	2.9J	2.3J	65	52	60-110			25	ML	
N-Nitrosodiphenylamine	mg/kg	ND	4.5	4.3	5.9	5.3	134	121	55-125	11		25	MH	
Naphthalene	mg/kg	ND	4.5	4.3	5.1	4.8	115	110	50-133	6		25		
Nitrobenzene	mg/kg	ND	4.5	4.3	4.8	4.3J	108	99	59-118			25		
Pentachlorophenol	mg/kg	ND	4.5	4.3	ND	ND	104	102	16-175			25		
Phenanthrene	mg/kg	ND	4.5	4.3	5.8	5.9	132	134	25-161	1		25		
Phenol	mg/kg	ND	4.5	4.3	4.8	4.6	109	106	60-125	4		25		
Pyrene	mg/kg	ND	4.5	4.3	5.9	5.8	134	133	13-173	2		25		
2,4,6-Tribromophenol (S)	%						155	112	44-127				S4	
2-Fluorobiphenyl (S)	%						156	123	50-144				S4	
2-Fluorophenol (S)	%						129	83	57-124				S4	
Nitrobenzene-d5 (S)	%						129	97	32-154					
Phenol-d6 (S)	%						144	102	54-121				S4	
Terphenyl-d14 (S)	%						172	132	57-146				S4	

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QUALITY CONTROL DATA

Project: 2503055
 Pace Project No.: 30770088

QC Batch: 738691 Analysis Method: EPA 9065
 QC Batch Method: EPA 9065 Analysis Description: 9065 Phenolics, Total Recoverable
 Laboratory: Pace Analytical Services - Greensburg
 Associated Lab Samples: 30770088001

METHOD BLANK: 3595323 Matrix: Solid
 Associated Lab Samples: 30770088001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Phenolics, Total Recoverable	mg/kg	ND	1.0	04/10/25 13:36	

LABORATORY CONTROL SAMPLE: 3595324

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Phenolics, Total Recoverable	mg/kg	10	11.1	111	85-115	

MATRIX SPIKE SAMPLE: 3595326

Parameter	Units	30770088001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Phenolics, Total Recoverable	mg/kg	ND	20.6	18.7	86	85-115	

SAMPLE DUPLICATE: 3595325

Parameter	Units	30770088001 Result	Dup Result	RPD	Max RPD	Qualifiers
Phenolics, Total Recoverable	mg/kg	ND	ND		20	

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Pace - Greensburg 1638 Roseytown Rd, Suite 2, 3, 4 Greensburg PA, 15601	Project Name: 2503055 Project Number: 2503055 Project Manager: Nikayla Yasurek	Reported: 04/23/2025 10:39
---	--	-------------------------------

Sample Number: 5D05118-01 Collector: Client	Site: 2503055-01 Collect Date: 04/07/2025 7:30 am	Sample ID: 2503055 Sample Type: Grab
--	--	---

Department / Test / Parameter	Result	Units	Method	MRL	MDL	DF	Prep Date	By	Analysis Date	By
<u>Semivolatiles</u>										
Dioxin	Absent	N/A	SW846 3550C/8270E			5	04/16/25	SCD	04/16/25 21:40	LEB

Work Order Memo

Sample Receipt Conditions:
 Sample(s) received with incomplete Chain of Custody form. At a minimum, Chain of Custody forms must contain a description of the sample location, matrix, the date and time of collection, the collector(s) initials or name, and the testing requested.

Units P/A = Present/Absent
 Units P/F = Pass/Fail


ENVIROCOP LABORATORIES INC.

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302-398-4313
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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER
Kent County Waste Treatment Facility
Project: Biosolids - Monthly

139 Milford Neck Road

Project Number:

Milford, DE 19963

Reported: 05/21/2025 15:42

Analytical Results

Sample ID:	Kentorganite	Sample Start:	05/05/25 09:15
Lab ID:	2503896-01	Received:	05/05/25 10:21
Matrix:	Solid		
Sample Type:	Grab		

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
---------	--------	-------	-----------------	-----------	--------	---------------	---------------	---------

Microbiology

Salmonella	ND	#/4 g TS dry	1.44		EPA 1682	5/5/25 16:05	5/6/25 16:22	RD
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Inorganic

% Moisture	49.9	%	0.100		SM2540-G	5/6/25 8:30	5/6/25 08:30	HM
% Solids	50.1	%	0.100		SM2540-G	5/5/25 14:07	5/6/25 11:51	HM
Chloride	1900	mg/L	0.50		SM4500-Cl-C	5/15/25 11:00	5/15/25 11:03	MEM
Ammonia as N	0.01	% dry	0.001		SM4500-NH3-G	5/7/25 9:58	5/7/25 11:10	CK
Nitrite as N	0.0007	% dry	0.0001		SM4500-NO2-B	5/6/25 13:21	5/6/25 15:58	CK
Nitrate as N	0.000216	% dry	0.000200		[CALC]	5/7/25 9:58	5/7/25 11:10	CK
Nitrate+Nitrite as N	0.000893	% dry	0.0000999		SM4500-NO3-H	5/7/25 9:58	5/7/25 11:10	CK
Organic Nitrogen as N	1.55	% dry			[CALC]	5/13/25 9:23	5/13/25 13:38	CK
pH	12.46	SU			SM4500-H+/B	5/7/25 14:36	5/7/25 14:36	JB
Total Kjeldahl Nitrogen	1.56	% dry	0.040		SM4500-Norg-C	5/13/25 9:23	5/13/25 13:38	CK
Total Nitrogen as N	1.56	% dry			[CALC]	5/13/25 9:23	5/13/25 13:38	CK
Total Phosphorus as P	0.211	% dry	0.0400		SM4500-P-F	5/13/25 9:23	5/13/25 13:53	CK
Volatile Solids	14.2	%	0.100		EPA 160.4	5/5/25 14:07	5/7/25 08:27	HM

Metals

Aluminum	2140	mg/kg dry	5.06		EPA 6010	5/8/25 9:00	5/8/25 14:07	JMW
Arsenic	4.65	mg/kg dry	0.506		EPA 6010	5/8/25 9:00	5/8/25 14:03	JMW
Cadmium	0.967	mg/kg dry	0.253		EPA 6010	5/8/25 9:00	5/8/25 14:03	JMW
Chromium	21.9	mg/kg dry	0.506		EPA 6010	5/8/25 9:00	5/8/25 14:03	JMW
Copper	142	mg/kg dry	0.506		EPA 6010	5/8/25 9:00	5/8/25 14:03	JMW
Iron	22100	mg/kg dry	5.06		EPA 6010	5/8/25 9:00	5/8/25 14:07	JMW
Potassium	0.284	% dry	0.0000506		EPA 6010	5/8/25 9:00	5/8/25 14:03	JMW
Molybdenum	5.81	mg/kg dry	0.506		EPA 6010	5/8/25 9:00	5/8/25 14:03	JMW
Sodium	761	mg/kg dry	0.506		EPA 6010	5/8/25 9:00	5/8/25 14:03	JMW
Nickel	ND	mg/kg dry	0.506		EPA 6010	5/8/25 9:00	5/8/25 14:03	JMW
Lead	4.99	mg/kg dry	0.506		EPA 6010	5/8/25 9:00	5/8/25 14:03	JMW
Selenium	ND	mg/kg dry	0.506		EPA 6010	5/8/25 9:00	5/8/25 14:03	JMW
Zinc	228	mg/kg dry	0.506		EPA 6010	5/8/25 9:00	5/8/25 14:03	JMW

Report Number
25-126-0071

Account Number
27155

Send To: Envirocorp Inc
51 Clark Street
Harrington, DE 19952



2790 Whitten Road, Memphis, TN 38133
Main 901.213.2400 ° Fax 901.213.2440
www.waypointanalytical.com

Page: 1 of 1

Project: Ketorganite
Subcontract Order# 2503896

Purchase Order:

Report Date: 05/15/2025

Date Received: 05/06/2025

Date Sampled: 05/05/2025

REPORT OF ANALYSIS

Farm Name:
Lab Number: 89917
Sample ID: 2503896-01

Analysis	Result	Quantitation Limit	Method	Date and Time Test Started	Analyst
Neutralizing Value (%CCE) , %	87.1	0.1	AOAC 955.01	05/15/2025 11:13	DXT

Method Reference:
Official Methods of Analysis of AOAC International, 17th Edition, 1998

Comments:

A handwritten signature in black ink that reads "Connie Cook".

Connie Cook
Project Manager



ANALYTICAL RESULTS

Project: 2503896
Pace Project No.: 30776550

Sample: 2503896-01 Lab ID: 30776550001 Collected: 05/05/25 09:15 Received: 05/06/25 10:30 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B Pace Analytical Services - Beaver								
Mercury	0.21	mg/kg	0.040	1	05/08/25 04:38	05/08/25 09:03	7439-97-6	
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546 Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	0.17	5	05/15/25 09:09	05/16/25 00:24	12674-11-2	ED
PCB-1016 (Aroclor 1016)	ND	mg/kg	0.16	5	05/19/25 09:08	05/20/25 12:53	12674-11-2	ED
PCB-1221 (Aroclor 1221)	ND	mg/kg	0.17	5	05/15/25 09:09	05/16/25 00:24	11104-28-2	ED
PCB-1221 (Aroclor 1221)	ND	mg/kg	0.16	5	05/19/25 09:08	05/20/25 12:53	11104-28-2	CH,ED
PCB-1232 (Aroclor 1232)	ND	mg/kg	0.17	5	05/15/25 09:09	05/16/25 00:24	11141-16-5	ED
PCB-1232 (Aroclor 1232)	ND	mg/kg	0.16	5	05/19/25 09:08	05/20/25 12:53	11141-16-5	CH,ED
PCB-1242 (Aroclor 1242)	ND	mg/kg	0.33	5	05/15/25 09:09	05/16/25 00:24	53469-21-9	ED
PCB-1242 (Aroclor 1242)	ND	mg/kg	0.33	5	05/19/25 09:08	05/20/25 12:53	53469-21-9	CH,ED
PCB-1248 (Aroclor 1248)	ND	mg/kg	0.17	5	05/15/25 09:09	05/16/25 00:24	12672-29-6	ED
PCB-1248 (Aroclor 1248)	ND	mg/kg	0.16	5	05/19/25 09:08	05/20/25 12:53	12672-29-6	CH,ED
PCB-1254 (Aroclor 1254)	ND	mg/kg	0.17	5	05/15/25 09:09	05/16/25 00:24	11097-69-1	ED
PCB-1254 (Aroclor 1254)	ND	mg/kg	0.16	5	05/19/25 09:08	05/20/25 12:53	11097-69-1	CH,ED
PCB-1260 (Aroclor 1260)	ND	mg/kg	0.33	5	05/15/25 09:09	05/16/25 00:24	11096-82-5	ED
PCB-1260 (Aroclor 1260)	ND	mg/kg	0.33	5	05/19/25 09:08	05/20/25 12:53	11096-82-5	CH,ED, L1
PCB, Total	ND	mg/kg	0.17	5	05/15/25 09:09	05/16/25 00:24	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	54	%	59-94	5	05/19/25 09:08	05/20/25 12:53	877-09-8	SR
Tetrachloro-m-xylene (S)	15	%	59-94	5	05/15/25 09:09	05/16/25 00:24	877-09-8	SR
Decachlorobiphenyl (S)	36	%	73-118	5	05/15/25 09:09	05/16/25 00:24	2051-24-3	SR
Decachlorobiphenyl (S)	108	%	73-118	5	05/19/25 09:08	05/20/25 12:53	2051-24-3	CH
Percent Moisture								
Analytical Method: SM 2540G-2015 Pace Analytical Services - Greensburg								
Percent Moisture	50.0	%	0.10	1		05/12/25 13:46		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2503896
Pace Project No.: 30776550

QC Batch: 744209 Analysis Method: EPA 7471B
QC Batch Method: EPA 7471B Analysis Description: BVR 7471B Mercury
Laboratory: Pace Analytical Services - Beaver

Associated Lab Samples: 30776550001

METHOD BLANK: 3622643 Matrix: Solid
Associated Lab Samples: 30776550001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	05/08/25 08:05	

LABORATORY CONTROL SAMPLE: 3622644

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.5	0.50	100	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3622645 3622646

Parameter	Units	30773578001		3622646		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
Mercury	mg/kg	0.038	0.9	0.89	15.5	0.99	1710	104	80-120	176	20 M1,R1

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QUALITY CONTROL DATA

Project: 2503896
Pace Project No.: 30776550

QC Batch: 745747 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30776550001

METHOD BLANK: 3631412 Matrix: Solid
Associated Lab Samples: 30776550001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.017	05/15/25 20:35	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.017	05/15/25 20:35	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.017	05/15/25 20:35	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	05/15/25 20:35	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.017	05/15/25 20:35	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.017	05/15/25 20:35	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	05/15/25 20:35	
Decachlorobiphenyl (S)	%	89	73-118	05/15/25 20:35	
Tetrachloro-m-xylene (S)	%	83	59-94	05/15/25 20:35	

LABORATORY CONTROL SAMPLE: 3631413

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.17	0.15	92	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.17	0.16	96	57-108	
Decachlorobiphenyl (S)	%			99	73-118	
Tetrachloro-m-xylene (S)	%			92	59-94	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3631414 3631415

Parameter	Units	3631414		3631415		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		30777811005 Result	MS Spike Conc.	MSD Spike Conc.	MS Result						
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.2	0.19	.18J	0.23	90	116	10-175	25	
PCB-1260 (Aroclor 1260)	mg/kg	420 ug/kg	0.2	0.19	0.45	1.0	14	294	10-175	76	25 MH,R1
Decachlorobiphenyl (S)	%						92	108	73-118		
Tetrachloro-m-xylene (S)	%						108	107	59-94		S4

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QUALITY CONTROL DATA

Project: 2503896
Pace Project No.: 30776550

QC Batch: 746391 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30776550001

METHOD BLANK: 3634969 Matrix: Solid
Associated Lab Samples: 30776550001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.017	05/20/25 12:35	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.017	05/20/25 12:35	CH
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.017	05/20/25 12:35	CH
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	05/20/25 12:35	CH
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.017	05/20/25 12:35	CH
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.017	05/20/25 12:35	CH
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	05/20/25 12:35	CH
Decachlorobiphenyl (S)	%	109	73-118	05/20/25 12:35	CH
Tetrachloro-m-xylene (S)	%	83	59-94	05/20/25 12:35	

LABORATORY CONTROL SAMPLE: 3634970

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.17	0.17	105	66-108	CH
PCB-1260 (Aroclor 1260)	mg/kg	0.17	0.19	114	57-108	CH,L1
Decachlorobiphenyl (S)	%			119	73-118	CH,S0
Tetrachloro-m-xylene (S)	%			96	59-94	S0

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3634971 3634972

Parameter	Units	30778547001		3634972		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual	
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result							
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.2	0.19	0.20	0.19	103	101	10-175	3	25	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.2	0.19	0.21	0.20	107	107	10-175	1	25	CH
Decachlorobiphenyl (S)	%						113	115	73-118			CH
Tetrachloro-m-xylene (S)	%						98	88	59-94			ST

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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER

Kent County Waste Treatment Facility

Project: Biosolids - Monthly

139 Milford Neck Road

Project Number:

Milford, DE 19963

Reported: 06/18/2025 16:15

Analytical Results

Sample ID: Kentorganite **Sample Start:** 06/02/25 08:00
Lab ID: 2504864-01
Matrix: Solid **Received:** 06/02/25 10:32
Sample Type: Grab

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
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Microbiology

Salmonella	ND	#/4 g TS dry	1.35		EPA 1682	6/2/25 15:24	6/3/25 17:20	RD
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Inorganic

% Moisture	46.7	%	0.100		SM2540-G	6/3/25 10:25	6/3/25 10:25	HM
% Solids	53.3	%	0.100		SM2540-G	6/2/25 15:20	6/3/25 13:30	HM
Chloride	1710	mg/L	0.50		SM4500-Cl-C	6/18/25 14:51	6/18/25 15:00	MEM
Ammonia as N	0.08	% dry	0.002		SM4500-NH3-G	6/9/25 10:25	6/9/25 13:25	CK
Nitrite as N	0.0008	% dry	0.00009		SM4500-NO2-B	6/4/25 10:59	6/4/25 15:37	CK
Nitrate as N	0.000810	% dry	0.000188		[CALC]	6/9/25 10:25	6/9/25 12:51	CK
Nitrate+Nitrite as N	0.00159	% dry	0.0000938		SM4500-NO3-H	6/9/25 10:25	6/9/25 12:51	CK
Organic Nitrogen as N	1.34	% dry			[CALC]	6/11/25 12:54	6/11/25 14:28	CK
pH	12.52	SU			SM4500-H+/B	6/3/25 12:11	6/3/25 12:11	HJG3
Total Kjeldahl Nitrogen	1.42	% dry	0.038		SM4500-Norg-C	6/11/25 12:54	6/11/25 14:28	CK
Total Nitrogen as N	1.43	% dry			[CALC]	6/11/25 12:54	6/11/25 14:28	CK
Total Phosphorus as P	0.147	% dry	0.0375		SM4500-P-F	6/11/25 12:54	6/11/25 14:33	CK
Volatile Solids	14.3	%	0.100		EPA 160.4	6/2/25 15:20	6/3/25 15:30	HM

Metals

Aluminum	1840	mg/kg dry	5.05		EPA 6010	6/5/25 9:00	6/5/25 13:30	JMW
Arsenic	3.50	mg/kg dry	0.505		EPA 6010	6/5/25 9:00	6/5/25 13:27	JMW
Cadmium	1.01	mg/kg dry	0.252		EPA 6010	6/5/25 9:00	6/5/25 13:27	JMW
Chromium	19.5	mg/kg dry	0.505		EPA 6010	6/5/25 9:00	6/5/25 13:27	JMW
Copper	131	mg/kg dry	0.505		EPA 6010	6/5/25 9:00	6/5/25 13:27	JMW
Iron	18600	mg/kg dry	5.05		EPA 6010	6/5/25 9:00	6/5/25 13:30	JMW
Potassium	0.346	% dry	0.0000505		EPA 6010	6/5/25 9:00	6/5/25 13:27	JMW
Molybdenum	6.43	mg/kg dry	0.505		EPA 6010	6/5/25 9:00	6/5/25 13:27	JMW
Sodium	676	mg/kg dry	0.505		EPA 6010	6/5/25 9:00	6/5/25 13:27	JMW
Nickel	11.3	mg/kg dry	0.505		EPA 6010	6/5/25 9:00	6/5/25 13:27	JMW
Lead	4.41	mg/kg dry	0.505		EPA 6010	6/5/25 9:00	6/5/25 13:27	JMW
Selenium	2.79	mg/kg dry	0.505		EPA 6010	6/5/25 9:00	6/5/25 13:27	JMW
Zinc	230	mg/kg dry	0.505		EPA 6010	6/5/25 9:00	6/5/25 13:27	JMW



ANALYTICAL RESULTS

Project: 2504864
Pace Project No.: 30783929

Sample: 2504864-01 **Lab ID: 30783929001** Collected: 06/02/25 08:00 Received: 06/03/25 10:15 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B Pace Analytical Services - Beaver								
Mercury	0.17	mg/kg	0.036	1	06/04/25 09:39	06/05/25 07:16	7439-97-6	
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546 Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	0.44	5	06/10/25 08:45	06/12/25 04:24	12674-11-2	ED,P1
PCB-1221 (Aroclor 1221)	ND	mg/kg	0.44	5	06/10/25 08:45	06/12/25 04:24	11104-28-2	ED,P1
PCB-1232 (Aroclor 1232)	ND	mg/kg	0.44	5	06/10/25 08:45	06/12/25 04:24	11141-16-5	ED,P1
PCB-1242 (Aroclor 1242)	ND	mg/kg	0.88	5	06/10/25 08:45	06/12/25 04:24	53469-21-9	ED,P1
PCB-1248 (Aroclor 1248)	ND	mg/kg	0.44	5	06/10/25 08:45	06/12/25 04:24	12672-29-6	ED,P1
PCB-1254 (Aroclor 1254)	ND	mg/kg	0.44	5	06/10/25 08:45	06/12/25 04:24	11097-69-1	ED,P1
PCB-1260 (Aroclor 1260)	ND	mg/kg	0.88	5	06/10/25 08:45	06/12/25 04:24	11096-82-5	ED,P1
PCB, Total	ND	mg/kg	0.44	5	06/10/25 08:45	06/12/25 04:24	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	66	%	59-94	5	06/10/25 08:45	06/12/25 04:24	877-09-8	
Decachlorobiphenyl (S)	111	%	73-118	5	06/10/25 08:45	06/12/25 04:24	2051-24-3	
Percent Moisture								
Analytical Method: SM 2540G-2015 Pace Analytical Services - Greensburg								
Percent Moisture	44.6	%	0.10	1		06/09/25 14:27		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2504864
Pace Project No.: 30783929

QC Batch: 749628 Analysis Method: EPA 7471B
QC Batch Method: EPA 7471B Analysis Description: BVR 7471B Mercury
Laboratory: Pace Analytical Services - Beaver

Associated Lab Samples: 30783929001

METHOD BLANK: 3651675 Matrix: Solid
Associated Lab Samples: 30783929001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	06/05/25 05:54	

LABORATORY CONTROL SAMPLE: 3651676

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.5	0.48	96	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3651677 3651678

Parameter	Units	30783612006		3651677		3651678		% Rec Limits	RPD	Max RPD	Qual	
		MS Result	MSD Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result					MS % Rec
Mercury	mg/kg	0.055	0.055	0.6	0.6	0.61	0.61	91	92	80-120	0	20

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QUALITY CONTROL DATA

Project: 2504864
Pace Project No.: 30783929

QC Batch: 750914 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30783929001

METHOD BLANK: 3658447 Matrix: Solid
Associated Lab Samples: 30783929001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.017	06/11/25 22:07	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.017	06/11/25 22:07	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.017	06/11/25 22:07	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	06/11/25 22:07	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.017	06/11/25 22:07	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.017	06/11/25 22:07	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	06/11/25 22:07	
Decachlorobiphenyl (S)	%	118	73-118	06/11/25 22:07	
Tetrachloro-m-xylene (S)	%	88	59-94	06/11/25 22:07	

LABORATORY CONTROL SAMPLE: 3658448

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.16	0.16	98	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.16	0.17	102	57-108	
Decachlorobiphenyl (S)	%			118	73-118	
Tetrachloro-m-xylene (S)	%			81	59-94	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3658449 3658450

Parameter	Units	3658449		3658450		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.21	3.9	2.8	1940	1410	10-175	34	25	MH,R1
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.21	.24J	.27J	118	136	10-175		25	
Decachlorobiphenyl (S)	%					82	99	73-118			
Tetrachloro-m-xylene (S)	%					215	223	59-94			S4

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ENVIROCORP LABORATORIES INC.

51 CLARK STREET, HARRINGTON, DE 19952
302-398-4313
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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER
Kent County Waste Treatment Facility
Project: Biosolids - Quarterly

139 Milford Neck Road

Project Number:

Milford, DE 19963

Reported: 07/28/2025 08:47

Analytical Results

Sample ID:	Kentorganite	Sample Start:	07/07/25 08:07
Lab ID:	2506094-01	Received:	07/07/25 10:29
Matrix:	Solid		
Sample Type:	Grab		

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
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Microbiology

Salmonella	ND	#/4 g TS dry	1.31		EPA 1682	7/7/25 15:32	7/8/25 16:36	RD
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Inorganic

% Moisture	45.0	%	0.100		SM2540-G	7/8/25 8:37	7/8/25 08:37	HM
% Solids	55.0	%	0.100		SM2540-G	7/7/25 15:56	7/8/25 10:10	HM
Chloride	2190	mg/L	0.50		SM4500-Cl-C	7/23/25 15:03	7/23/25 15:07	MEM
Cyanide	0.0897	mg/L	0.0549		SM4500-CN-E	7/18/25 13:02	7/25/25 16:40	JMW
Ammonia as N	0.08	% dry	0.004		SM4500-NH3-G	7/10/25 10:23	7/10/25 12:09	CK
Nitrite as N	0.0005	% dry	0.00009		SM4500-NO2-B	7/9/25 14:58	7/9/25 15:42	CK
Nitrate as N	ND	% dry	0.000182		[CALC]	7/10/25 10:23	7/10/25 12:09	CK
Nitrate+Nitrite as N	0.000605	% dry	0.0000908		SM4500-NO3-H	7/10/25 10:23	7/10/25 12:09	CK
Organic Nitrogen as N	1.39	% dry			[CALC]	7/18/25 10:46	7/18/25 13:03	JMW
pH	12.43	SU			SM4500-H+/B	7/8/25 15:59	7/8/25 15:59	ML
Total Kjeldahl Nitrogen	1.47	% dry	0.036		SM4500-Norg-C	7/18/25 10:46	7/18/25 13:03	JMW
Total Nitrogen as N	1.47	% dry			[CALC]	7/18/25 10:46	7/18/25 13:03	JMW
Total Phosphorus as P	0.0807	% dry	0.0363		SM4500-P-F	7/18/25 10:46	7/18/25 13:01	JMW
Volatile Solids	11.6	%	0.100		EPA 160.4	7/7/25 15:56	7/9/25 10:25	HM

Metals

Silver	0.698	mg/kg dry	0.293		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW
Aluminum	2180	mg/kg dry	5.86		EPA 6010	7/15/25 9:00	7/15/25 14:53	JMW
Arsenic	3.30	mg/kg dry	0.586		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW
Cadmium	1.13	mg/kg dry	0.293		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW
Chromium	23.8	mg/kg dry	0.586		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW
Copper	150	mg/kg dry	0.586		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW
Iron	25500	mg/kg dry	5.86		EPA 6010	7/15/25 9:00	7/15/25 14:53	JMW
Potassium	0.198	% dry	0.0000586		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW
Molybdenum	7.61	mg/kg dry	0.586		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW
Sodium	740	mg/kg dry	0.586		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW
Nickel	12.3	mg/kg dry	0.586		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW
Lead	5.75	mg/kg dry	0.586		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW
Selenium	1.12	mg/kg dry	0.586		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW
Zinc	269	mg/kg dry	0.586		EPA 6010	7/15/25 9:00	7/15/25 14:50	JMW

Report Number
25-189-0044

Account Number
27155

Send To: Envirocorp Inc
51 Clark Street
Harrington, DE 19952



2790 Whitten Road, Memphis, TN 38133
Main 901.213.2400 ° Fax 901.213.2440
www.waypointanalytical.com

Page: 1 of 1

Project: Subcontract Order: 2506094

Purchase Order:

Report Date: 07/14/2025

Date Received: 07/08/2025

Date Sampled: 07/07/2025

REPORT OF ANALYSIS

Farm Name:

Lab Number: 84947

Sample ID: 2506094-01

Analysis	Result	Quantitation Limit	Method	Date and Time Test Started	Analyst
Neutralizing Value (%CCE) , %	57.3	0.1	AOAC 955.01	07/11/2025 12:40	DXT

Method Reference:

Official Methods of Analysis of AOAC International, 17th Edition, 1998

Comments:

Connie Cook
Project Manager



ANALYTICAL RESULTS

Project: 2506094
Pace Project No.: 30792905

Sample: 2506094-01 **Lab ID: 30792905001** Collected: 07/07/25 08:07 Received: 07/08/25 10:30 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Comments: • The sampler's name and signature were not listed on the COC.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B Pace Analytical Services - Beaver								
Mercury	0.14	mg/kg	0.037	1	07/09/25 09:48	07/10/25 08:04	7439-97-6	
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546 Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	1.1	5	07/11/25 09:03	07/11/25 23:57	12674-11-2	ED,P1
PCB-1221 (Aroclor 1221)	ND	mg/kg	1.1	5	07/11/25 09:03	07/11/25 23:57	11104-28-2	ED,P1
PCB-1232 (Aroclor 1232)	ND	mg/kg	1.1	5	07/11/25 09:03	07/11/25 23:57	11141-16-5	ED,P1
PCB-1242 (Aroclor 1242)	ND	mg/kg	2.2	5	07/11/25 09:03	07/11/25 23:57	53469-21-9	ED,P1
PCB-1248 (Aroclor 1248)	ND	mg/kg	1.1	5	07/11/25 09:03	07/11/25 23:57	12672-29-6	ED,P1
PCB-1254 (Aroclor 1254)	ND	mg/kg	1.1	5	07/11/25 09:03	07/11/25 23:57	11097-69-1	ED,P1
PCB-1260 (Aroclor 1260)	ND	mg/kg	2.2	5	07/11/25 09:03	07/11/25 23:57	11096-82-5	ED,P1
PCB, Total	ND	mg/kg	1.1	5	07/11/25 09:03	07/11/25 23:57	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	69	%	59-94	5	07/11/25 09:03	07/11/25 23:57	877-09-8	
Decachlorobiphenyl (S)	74	%	73-118	5	07/11/25 09:03	07/11/25 23:57	2051-24-3	
Percent Moisture								
Analytical Method: SM 2540G-2015 Pace Analytical Services - Greensburg								
Percent Moisture	46.8	%	0.10	1		07/09/25 11:21		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2506094
Pace Project No.: 30792905

QC Batch: 756827 Analysis Method: EPA 7471B
QC Batch Method: EPA 7471B Analysis Description: BVR 7471B Mercury
Laboratory: Pace Analytical Services - Beaver
Associated Lab Samples: 30792905001

METHOD BLANK: 3688112 Matrix: Solid
Associated Lab Samples: 30792905001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	07/10/25 07:32	

LABORATORY CONTROL SAMPLE: 3688113

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.5	0.50	100	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3688114 3688115

Parameter	Units	30793025001		3688115		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
Mercury	mg/kg	<0.023	0.62	0.61	0.61	98	99	80-120	1	20	H1

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QUALITY CONTROL DATA

Project: 2506094
Pace Project No.: 30792905

QC Batch: 757411 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30792905001

METHOD BLANK: 3691516 Matrix: Solid
Associated Lab Samples: 30792905001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.016	07/14/25 05:34	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.016	07/14/25 05:34	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.016	07/14/25 05:34	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	07/14/25 05:34	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.016	07/14/25 05:34	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.016	07/14/25 05:34	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	07/14/25 05:34	
Decachlorobiphenyl (S)	%	85	73-118	07/14/25 05:34	
Tetrachloro-m-xylene (S)	%	82	59-94	07/14/25 05:34	

LABORATORY CONTROL SAMPLE: 3691517

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.17	0.15	89	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.17	0.14	88	57-108	
Decachlorobiphenyl (S)	%			80	73-118	
Tetrachloro-m-xylene (S)	%			80	59-94	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3691518 3691519

Parameter	Units	3691518		3691519		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
PCB-1016 (Aroclor 1016)	mg/kg	<36.9 ug/kg	0.57	0.57	0.51	0.47	89	82	10-175	8	25
PCB-1260 (Aroclor 1260)	mg/kg	<10.4 ug/kg	0.57	0.57	0.51	0.46	89	81	10-175	9	25
Decachlorobiphenyl (S)	%						81	75	73-118		
Tetrachloro-m-xylene (S)	%						75	77	59-94		

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QUALITY CONTROL DATA

Project: 2506094
Pace Project No.: 30792905

QC Batch: 756846 Analysis Method: SM 2540G-2015
QC Batch Method: SM 2540G-2015 Analysis Description: Dry Weight/Percent Moisture
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30792905001

SAMPLE DUPLICATE: 3688148

Parameter	Units	30793026001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	0.37	0.14	93	10	D6,H3

SAMPLE DUPLICATE: 3688149

Parameter	Units	30793025001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	19.2	18.5	4	10	H3

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ENVIROCORP LABORATORIES INC.

51 CLARK STREET, HARRINGTON, DE 19952
302-398-4313
www.envirocorplabs.com



ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER

Kent County Waste Treatment Facility

Project: Biosolids - Monthly

139 Milford Neck Road

Project Number:

Milford, DE 19963

Reported: 08/26/2025 14:32

Analytical Results

Sample ID: Kentorganite **Sample Start:** 08/04/25 06:30
Lab ID: 2506997-01
Matrix: Solid **Received:** 08/04/25 10:36
Sample Type: Grab

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
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Microbiology

Salmonella	ND	#/4 g TS dry	1.36		EPA 1682	8/4/25 14:11	8/5/25 16:37	RD
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Inorganic

% Moisture	47.0	%	0.100		SM2540-G	8/5/25 8:23	8/5/25 08:23	HM
% Solids	53.0	%	0.100		SM2540-G	8/4/25 15:09	8/5/25 09:31	HM
Chloride	1710	mg/L	0.50		SM4500-Cl-C	8/26/25 11:41	8/26/25 13:53	MEM
Ammonia as N	0.09	% dry	0.002		SM4500-NH3-G	8/12/25 10:32	8/12/25 12:17	CK
Nitrite as N	0.0004	% dry	0.00009		SM4500-NO2-B	8/6/25 15:12	8/6/25 16:23	CK
Nitrate as N	ND	% dry	0.000189		[CALC]	8/12/25 10:32	8/12/25 12:23	CK
Nitrate+Nitrite as N	0.000594	% dry	0.0000943		SM4500-NO3-H	8/12/25 10:32	8/12/25 12:23	CK
Organic Nitrogen as N	1.12	% dry			[CALC]	8/18/25 12:20	8/18/25 15:20	CK
pH	12.12	SU			SM4500-H+/B	8/4/25 13:26	8/4/25 13:26	LAW
Total Kjeldahl Nitrogen	1.21	% dry	0.038		SM4500-Norg-C	8/18/25 12:20	8/18/25 15:20	CK
Total Nitrogen as N	1.21	% dry			[CALC]	8/18/25 12:20	8/18/25 15:20	CK
Total Phosphorus as P	0.333	% dry	0.0377		SM4500-P-F	8/18/25 12:20	8/18/25 15:20	CK
Volatile Solids	13.0	%	0.100		EPA 160.4	8/4/25 15:09	8/7/25 13:41	HM

Metals

Aluminum	2370	mg/kg dry	4.99		EPA 6010	8/7/25 11:00	8/7/25 18:07	JMW
Arsenic	7.27	mg/kg dry	0.499		EPA 6010	8/7/25 11:00	8/7/25 17:38	JMW
Cadmium	0.973	mg/kg dry	0.249		EPA 6010	8/7/25 11:00	8/7/25 17:38	JMW
Chromium	26.5	mg/kg dry	0.499		EPA 6010	8/7/25 11:00	8/7/25 17:38	JMW
Copper	120	mg/kg dry	0.499		EPA 6010	8/7/25 11:00	8/7/25 17:38	JMW
Iron	30700	mg/kg dry	4.99		EPA 6010	8/7/25 11:00	8/7/25 18:07	JMW
Potassium	0.180	% dry	0.0000499		EPA 6010	8/7/25 11:00	8/7/25 17:38	JMW
Molybdenum	6.22	mg/kg dry	0.499		EPA 6010	8/7/25 11:00	8/7/25 17:38	JMW
Sodium	688	mg/kg dry	0.499		EPA 6010	8/7/25 11:00	8/7/25 17:38	JMW
Nickel	ND	mg/kg dry	0.499		EPA 6010	8/7/25 11:00	8/7/25 17:38	JMW
Lead	6.88	mg/kg dry	0.499		EPA 6010	8/7/25 11:00	8/7/25 17:38	JMW
Selenium	7.34	mg/kg dry	0.499		EPA 6010	8/7/25 11:00	8/7/25 17:38	JMW
Zinc	319	mg/kg dry	4.99		EPA 6010	8/7/25 11:00	8/7/25 18:07	JMW



ANALYTICAL RESULTS

Project: 2506997
Pace Project No.: 30799866

Sample: 2506997-01 **Lab ID: 30799866001** Collected: 08/04/25 06:30 Received: 08/05/25 10:15 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B Pace Analytical Services - Beaver								
Mercury	0.28	mg/kg	0.036	1	08/06/25 07:30	08/07/25 08:13	7439-97-6	M1
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546 Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	0.44	5	08/07/25 09:25	08/08/25 05:04	12674-11-2	ED,P1
PCB-1221 (Aroclor 1221)	ND	mg/kg	0.44	5	08/07/25 09:25	08/08/25 05:04	11104-28-2	ED,P1
PCB-1232 (Aroclor 1232)	ND	mg/kg	0.44	5	08/07/25 09:25	08/08/25 05:04	11141-16-5	ED,P1
PCB-1242 (Aroclor 1242)	ND	mg/kg	0.89	5	08/07/25 09:25	08/08/25 05:04	53469-21-9	ED,P1
PCB-1248 (Aroclor 1248)	ND	mg/kg	0.44	5	08/07/25 09:25	08/08/25 05:04	12672-29-6	ED,P1
PCB-1254 (Aroclor 1254)	ND	mg/kg	0.44	5	08/07/25 09:25	08/08/25 05:04	11097-69-1	ED,P1
PCB-1260 (Aroclor 1260)	ND	mg/kg	0.89	5	08/07/25 09:25	08/08/25 05:04	11096-82-5	ED,P1
PCB, Total	ND	mg/kg	0.44	5	08/07/25 09:25	08/08/25 05:04	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	85	%.	59-94	5	08/07/25 09:25	08/08/25 05:04	877-09-8	
Decachlorobiphenyl (S)	104	%.	73-118	5	08/07/25 09:25	08/08/25 05:04	2051-24-3	
Percent Moisture								
Analytical Method: SM 2540G-2015 Pace Analytical Services - Greensburg								
Percent Moisture	45.3	%	0.10	1		08/06/25 16:10		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2506997
Pace Project No.: 30799866

QC Batch: 762633 Analysis Method: EPA 7471B
QC Batch Method: EPA 7471B Analysis Description: BVR 7471B Mercury
Laboratory: Pace Analytical Services - Beaver
Associated Lab Samples: 30799866001

METHOD BLANK: 3716190 Matrix: Solid
Associated Lab Samples: 30799866001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	08/07/25 06:25	

LABORATORY CONTROL SAMPLE: 3716191

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.5	0.50	101	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3716192 3716193

Parameter	Units	30799866001		3716193		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
Mercury	mg/kg	0.28	0.91	0.93	1.0	1.1	78	86	80-120	7	20 M1

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QUALITY CONTROL DATA

Project: 2506997
Pace Project No.: 30799866

QC Batch: 762948 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30799866001

METHOD BLANK: 3718130 Matrix: Solid
Associated Lab Samples: 30799866001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.017	08/07/25 23:22	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.017	08/07/25 23:22	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.017	08/07/25 23:22	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	08/07/25 23:22	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.017	08/07/25 23:22	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.017	08/07/25 23:22	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	08/07/25 23:22	
Decachlorobiphenyl (S)	%	76	73-118	08/07/25 23:22	
Tetrachloro-m-xylene (S)	%	81	59-94	08/07/25 23:22	

LABORATORY CONTROL SAMPLE: 3718131

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.16	0.14	89	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.16	0.15	89	57-108	
Decachlorobiphenyl (S)	%			77	73-118	
Tetrachloro-m-xylene (S)	%			84	59-94	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3718132 3718133

Parameter	Units	3718132		3718133		MS % Rec	MSD % Rec	% Rec Limits	Max RPD	Qual
		30799371001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result					
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.21	0.19	0.18	0.18	90	92	10-175	1 25
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.21	0.19	0.17	0.16	84	83	10-175	2 25
Decachlorobiphenyl (S)	%						76	77	73-118	
Tetrachloro-m-xylene (S)	%						80	82	59-94	

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Report Number

25-217-0094

Account Number

27155

Send To: Envirocorp Inc

51 Clark Street
Harrington, DE 19952



2790 Whitten Road, Memphis, TN 38133

Main 901.213.2400 ° Fax 901.213.2440

www.waypointanalytical.com

Page: 1 of 1

Project: Subcontract Order: 2506997

Purchase Order:

Report Date: 08/08/2025

Date Received: 08/05/2025

Date Sampled: 08/04/2025

REPORT OF ANALYSIS

Farm Name:

Lab Number: 97074

Sample ID: 2506997-01 (Kentorganite)

Analysis	Result	Quantitation Limit	Method	Date and Time Test Started	Analyst
Neutralizing Value (%CCE) , %	59.1	0.1	AOAC 955.01	08/07/2025 14:20	DXT

Method Reference:

Official Methods of Analysis of AOAC International, 17th Edition, 1998

Comments:

Connie Cook
Project Manager

ENVIROCORP LABORATORIES INC.



51 CLARK STREET, HARRINGTON, DE 19952
302-398-4313
www.envirocorplabs.com



ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER

Kent County Waste Treatment Facility	Project: Biosolids - Monthly
139 Milford Neck Road	Project Number:
Milford, DE 19963	Reported: 09/30/2025 16:13

Analytical Results

Sample ID: Kentorganite	Sample Start: 09/08/25 08:10
Lab ID: 2508199-01	
Matrix: Solid	
Sample Type: Grab	Received: 09/08/25 10:28

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
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Microbiology

Salmonella	ND	#/4 g TS dry	1.45		EPA 1682	9/8/25 14:30	9/9/25 16:21	RD
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Inorganic

% Moisture	50.4	%	0.100		SM2540-G	9/9/25 8:32	9/9/25 08:32	HM
% Solids	49.6	%	0.100		SM2540-G	9/8/25 14:08	9/9/25 09:37	HM
Chloride	2280	mg/L	0.50		SM4500-Cl-C	9/11/25 10:44	9/11/25 11:06	MEM
Ammonia as N	0.09	% dry	0.004		SM4500-NH3-G	9/16/25 10:26	9/16/25 11:21	CK
Nitrite as N	0.0006	% dry	0.0001		SM4500-NO2-B	9/10/25 15:18	9/10/25 16:41	CK
Nitrate as N	ND	% dry	0.000202		[CALC]	9/16/25 10:26	9/16/25 13:19	CK
Nitrate+Nitrite as N	0.000742	% dry	0.000101		SM4500-NO3-H	9/16/25 10:26	9/16/25 13:19	CK
Organic Nitrogen as N	1.66	% dry			[CALC]	9/18/25 10:35	9/18/25 13:43	CK
pH	12.37	SU			SM4500-H+/B	9/8/25 14:58	9/8/25 14:58	HM
Total Kjeldahl Nitrogen	1.75	% dry	0.040		SM4500-Norg-C	9/18/25 10:35	9/18/25 13:43	CK
Total Nitrogen as N	1.75	% dry			[CALC]	9/18/25 10:35	9/18/25 13:43	CK
Total Phosphorus as P	0.397	% dry	0.0403		SM4500-P-F	9/18/25 10:35	9/18/25 13:45	CK
Volatile Solids	11.5	%	0.100		EPA 160.4	9/8/25 14:08	9/10/25 12:32	HM

Metals

Aluminum	2470	mg/kg dry	4.86		EPA 6010	9/23/25 9:00	9/23/25 15:38	JMW
Arsenic	6.02	mg/kg dry	0.486		EPA 6010	9/23/25 9:00	9/23/25 15:35	JMW
Cadmium	1.06	mg/kg dry	0.243		EPA 6010	9/23/25 9:00	9/23/25 15:35	JMW
Chromium	33.5	mg/kg dry	0.486		EPA 6010	9/23/25 9:00	9/23/25 15:35	JMW
Copper	156	mg/kg dry	0.486		EPA 6010	9/23/25 9:00	9/23/25 15:35	JMW
Iron	37500	mg/kg dry	4.86		EPA 6010	9/23/25 9:00	9/23/25 15:38	JMW
Potassium	0.194	% dry	0.0000486		EPA 6010	9/23/25 9:00	9/23/25 15:35	JMW
Molybdenum	7.20	mg/kg dry	0.486		EPA 6010	9/23/25 9:00	9/23/25 15:35	JMW
Sodium	918	mg/kg dry	0.486		EPA 6010	9/23/25 9:00	9/23/25 15:35	JMW
Nickel	3.28	mg/kg dry	0.486		EPA 6010	9/23/25 9:00	9/23/25 15:35	JMW
Lead	7.07	mg/kg dry	0.486		EPA 6010	9/23/25 9:00	9/23/25 15:35	JMW
Selenium	1.40	mg/kg dry	0.486		EPA 6010	9/23/25 9:00	9/23/25 15:35	JMW
Zinc	323	mg/kg dry	4.86		EPA 6010	9/23/25 9:00	9/23/25 15:38	JMW

Report Number
25-252-0023
Account Number
27155



2790 Whitten Road, Memphis, TN 38133
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Send To: Envirocorp Inc
51 Clark Street
Harrington, DE 19952

Page: 1 of 1

Project: Subcontract Order: 2508199

Purchase Order:

Report Date: 09/16/2025

Date Received: 09/09/2025

REPORT OF ANALYSIS

Date Sampled: 09/08/2025

Farm Name:
Lab Number: 97974
Sample ID: 2508199-01

Analysis	Result	Quantitation Limit	Method	Date and Time Test Started	Analyst
Neutralizing Value (%CCE) , %	100	0.1	AOAC 955.01	09/15/2025 14:20	DXT

Method Reference:
Official Methods of Analysis of AOAC International, 17th Edition, 1998

Comments:

A handwritten signature in black ink that reads "Connie Cook".

Connie Cook
Project Manager



ANALYTICAL RESULTS

Project: 2508199

Pace Project No.: 30809027

Sample: 2508199-01 **Lab ID: 30809027001** Collected: 09/08/25 08:10 Received: 09/09/25 11:00 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B								
Pace Analytical Services - Beaver								
Mercury	0.25	mg/kg	0.038	1	09/11/25 05:35	09/11/25 11:32	7439-97-6	
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546								
Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	1.1	5	09/25/25 08:36	09/26/25 02:27	12674-11-2	ED, P1
PCB-1221 (Aroclor 1221)	ND	mg/kg	1.1	5	09/25/25 08:36	09/26/25 02:27	11104-28-2	ED, P1
PCB-1232 (Aroclor 1232)	ND	mg/kg	1.1	5	09/25/25 08:36	09/26/25 02:27	11141-16-5	ED, P1
PCB-1242 (Aroclor 1242)	ND	mg/kg	2.1	5	09/25/25 08:36	09/26/25 02:27	53469-21-9	ED, P1
PCB-1248 (Aroclor 1248)	ND	mg/kg	1.1	5	09/25/25 08:36	09/26/25 02:27	12672-29-6	ED, P1
PCB-1254 (Aroclor 1254)	ND	mg/kg	1.1	5	09/25/25 08:36	09/26/25 02:27	11097-69-1	ED, P1
PCB-1260 (Aroclor 1260)	ND	mg/kg	2.1	5	09/25/25 08:36	09/26/25 02:27	11096-82-5	ED, P1
PCB, Total	ND	mg/kg	1.1	5	09/25/25 08:36	09/26/25 02:27	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	88	%.	59-94	5	09/25/25 08:36	09/26/25 02:27	877-09-8	
Decachlorobiphenyl (S)	82	%.	73-118	5	09/25/25 08:36	09/26/25 02:27	2051-24-3	
Percent Moisture								
Analytical Method: SM 2540G-2015								
Pace Analytical Services - Greensburg								
Percent Moisture	48.3	%	0.10	1		09/11/25 10:50		1c

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2508199

Pace Project No.: 30809027

QC Batch: 770049

Analysis Method: EPA 7471B

QC Batch Method: EPA 7471B

Analysis Description: BVR 7471B Mercury

Laboratory: Pace Analytical Services - Beaver

Associated Lab Samples: 30809027001

METHOD BLANK: 3753981

Matrix: Solid

Associated Lab Samples: 30809027001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	09/11/25 10:31	

LABORATORY CONTROL SAMPLE: 3753982

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.5	0.50	100	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3753983 3753984

Parameter	Units	3753983		3753984		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
Mercury	mg/kg	ND	4.4	4.4	4.2	4.2	97	97	80-120	0	20

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QUALITY CONTROL DATA

Project: 2508199
Pace Project No.: 30809027

QC Batch: 772961 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30809027001

METHOD BLANK: 3768478 Matrix: Solid
Associated Lab Samples: 30809027001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.016	09/25/25 21:03	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.016	09/25/25 21:03	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.016	09/25/25 21:03	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	09/25/25 21:03	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.016	09/25/25 21:03	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.016	09/25/25 21:03	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	09/25/25 21:03	
Decachlorobiphenyl (S)	%	74	73-118	09/25/25 21:03	
Tetrachloro-m-xylene (S)	%	78	59-94	09/25/25 21:03	

LABORATORY CONTROL SAMPLE: 3768479

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.16	0.14	88	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.16	0.14	89	57-108	
Decachlorobiphenyl (S)	%			79	73-118	
Tetrachloro-m-xylene (S)	%			79	59-94	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3768480 3768481

Parameter	Units	30810664001		3768481		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.2	0.2	76.2	49.0	37400	23700	43	25	E,MH, R1
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.2	0.2	.25J	.16J	121	76		25	
Decachlorobiphenyl (S)	%						98	64			S4
Tetrachloro-m-xylene (S)	%						108	68			S4

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

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QUALITY CONTROL DATA

Project: 2508199

Pace Project No.: 30809027

QC Batch: 770100

Analysis Method: SM 2540G-2015

QC Batch Method: SM 2540G-2015

Analysis Description: Dry Weight/Percent Moisture

Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30809027001

SAMPLE DUPLICATE: 3754138

Parameter	Units	30809134001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	80.0	80.2	0	10	1c

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

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER
Kent County Waste Treatment Facility
Project: Biosolids - Quarterly

139 Milford Neck Road

Project Number:

Milford, DE 19963

Reported: 10/28/2025 06:33

Analytical Results

Sample ID:	Kentorganite	Sample Start:	10/06/25 08:15
Lab ID:	2509117-01	Received:	10/06/25 10:28
Matrix:	Solid		
Sample Type:	Grab		

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
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Microbiology

Salmonella	ND	#/4 g TS dry	1.59		EPA 1682	10/6/25 16:08	10/8/25 08:53	RD
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Inorganic

% Moisture	54.8	%	0.100		SM2540-G	10/7/25 11:09	10/7/25 11:09	HM
% Solids	45.2	%	0.100		SM2540-G	10/6/25 15:58	10/7/25 15:20	HM
Chloride	2030	mg/L	0.50		SM4500-Cl-C	10/10/25 10:18	10/10/25 12:17	MEM
Cyanide	0.0746	mg/L	0.0452		SM4500-CN-E	10/10/25 13:42	10/16/25 16:05	JMW
Ammonia as N	0.09	% dry	0.004		SM4500-NH3-G	10/14/25 11:24	10/14/25 13:09	CK
Nitrite as N	0.0007	% dry	0.0001		SM4500-NO2-B	10/8/25 16:09	10/8/25 16:34	CK
Nitrate as N	0.000314	% dry	0.000221		[CALC]	10/14/25 11:24	10/14/25 13:10	CK
Nitrate+Nitrite as N	0.00106	% dry	0.000111		SM4500-NO3-H	10/14/25 11:24	10/14/25 13:10	CK
Organic Nitrogen as N	1.90	% dry			[CALC]	10/15/25 10:00	10/15/25 13:40	CK
pH	12.35	SU			SM4500-H+/B	10/7/25 13:24	10/7/25 13:24	LAW
Total Kjeldahl Nitrogen	1.98	% dry	0.044		SM4500-Norg-C	10/15/25 10:00	10/15/25 13:40	CK
Total Nitrogen as N	1.99	% dry			[CALC]	10/15/25 10:00	10/15/25 13:40	CK
Total Phosphorus as P	0.583	% dry	0.0443		SM4500-P-F	10/15/25 10:00	10/15/25 14:00	CK
Volatile Solids	12.7	%	0.100		EPA 160.4	10/6/25 15:58	10/8/25 13:20	HM

Metals

Silver	1.08	mg/kg dry	0.245		EPA 6010	10/16/25 9:00	10/16/25 15:01	JMW
Aluminum	2360	mg/kg dry	4.89		EPA 6010	10/16/25 9:00	10/16/25 15:05	JMW
Arsenic	6.81	mg/kg dry	0.489		EPA 6010	10/16/25 9:00	10/16/25 15:01	JMW
Cadmium	1.34	mg/kg dry	0.245		EPA 6010	10/16/25 9:00	10/16/25 15:01	JMW
Chromium	36.7	mg/kg dry	0.489		EPA 6010	10/16/25 9:00	10/16/25 15:01	JMW
Copper	180	mg/kg dry	0.489		EPA 6010	10/16/25 9:00	10/16/25 15:01	JMW
Iron	32900	mg/kg dry	4.89		EPA 6010	10/16/25 9:00	10/16/25 15:05	JMW
Potassium	0.237	% dry	0.0000489		EPA 6010	10/16/25 9:00	10/16/25 15:01	JMW
Molybdenum	8.10	mg/kg dry	0.489		EPA 6010	10/16/25 9:00	10/16/25 15:01	JMW
Sodium	1010	mg/kg dry	0.489		EPA 6010	10/16/25 9:00	10/16/25 15:01	JMW
Nickel	6.39	mg/kg dry	0.489		EPA 6010	10/16/25 9:00	10/16/25 15:01	JMW
Lead	5.88	mg/kg dry	0.489		EPA 6010	10/16/25 9:00	10/16/25 15:01	JMW
Selenium	5.19	mg/kg dry	0.489		EPA 6010	10/16/25 9:00	10/16/25 15:01	JMW
Zinc	301	mg/kg dry	4.89		EPA 6010	10/16/25 9:00	10/16/25 15:05	JMW

Report Number
25-280-0068

Account Number
27155

Send To: Envirocorp Inc
51 Clark Street
Harrington, DE 19952



2790 Whitten Road, Memphis, TN 38133
Main 901.213.2400 ° Fax 901.213.2440
www.waypointanalytical.com

Page: 1 of 1

Project: Subcontract Order: 2509117
Analytical Testing

Purchase Order:

Report Date: 10/17/2025

Date Received: 10/07/2025

Date Sampled: 10/06/2025

REPORT OF ANALYSIS

Farm Name:

Lab Number: 95125

Sample ID: 2509117-01

Analysis	Result	Quantitation Limit	Method	Date and Time Test Started	Analyst
Neutralizing Value (%CCE) , %	52.7	0.1	AOAC 955.01	10/16/2025 12:44	DXT

Method Reference:

Official Methods of Analysis of AOAC International, 17th Edition, 1998

Comments:

A handwritten signature in black ink that reads "Connie Cook".

Connie Cook
Project Manager



ANALYTICAL RESULTS

Project: 2509117
 Pace Project No.: 30816214

Sample: 2509117-01 **Lab ID: 30816214001** Collected: 10/06/25 08:15 Received: 10/07/25 10:15 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Comments: • The sampler's name and/or signature was not listed on the client COC; client notified via SAF.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B Pace Analytical Services - Beaver								
Mercury	0.17	mg/kg	0.042	1	10/09/25 09:40	10/10/25 14:00	7439-97-6	
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546 Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	1.1	5	10/23/25 09:00	10/24/25 01:54	12674-11-2	ED,P1
PCB-1221 (Aroclor 1221)	ND	mg/kg	1.1	5	10/23/25 09:00	10/24/25 01:54	11104-28-2	ED,P1
PCB-1232 (Aroclor 1232)	ND	mg/kg	1.1	5	10/23/25 09:00	10/24/25 01:54	11141-16-5	ED,P1
PCB-1242 (Aroclor 1242)	ND	mg/kg	2.3	5	10/23/25 09:00	10/24/25 01:54	53469-21-9	ED,P1
PCB-1248 (Aroclor 1248)	ND	mg/kg	1.1	5	10/23/25 09:00	10/24/25 01:54	12672-29-6	ED,P1
PCB-1254 (Aroclor 1254)	ND	mg/kg	1.1	5	10/23/25 09:00	10/24/25 01:54	11097-69-1	ED,P1
PCB-1260 (Aroclor 1260)	ND	mg/kg	2.3	5	10/23/25 09:00	10/24/25 01:54	11096-82-5	ED,P1
PCB, Total	ND	mg/kg	1.1	5	10/23/25 09:00	10/24/25 01:54	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	85	%	59-94	5	10/23/25 09:00	10/24/25 01:54	877-09-8	
Decachlorobiphenyl (S)	74	%	73-118	5	10/23/25 09:00	10/24/25 01:54	2051-24-3	
Percent Moisture								
Analytical Method: SM 2540G-2015 Pace Analytical Services - Greensburg								
Percent Moisture	51.7	%	0.10	1		10/09/25 11:13		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2509117
Pace Project No.: 30816214

QC Batch: 776131 Analysis Method: EPA 7471B
QC Batch Method: EPA 7471B Analysis Description: BVR 7471B Mercury
Laboratory: Pace Analytical Services - Beaver

Associated Lab Samples: 30816214001

METHOD BLANK: 3785089 Matrix: Solid
Associated Lab Samples: 30816214001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	10/10/25 13:52	

LABORATORY CONTROL SAMPLE: 3785090

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.5	0.59	119	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3785091 3785092

Parameter	Units	30816618001		3785091		3785092		% Rec Limits	RPD	Max RPD	Qual	
		MS Result	MS Spike Conc.	MS Result	MS Spike Conc.	MS Result	MS Spike Conc.					MS Result
Mercury	mg/kg	0.024	0.61	0.61	0.61	0.79	0.81	124	129	80-120	3	20 M1

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QUALITY CONTROL DATA

Project: 2509117
Pace Project No.: 30816214

QC Batch: 779074 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30816214001

METHOD BLANK: 3799351 Matrix: Solid
Associated Lab Samples: 30816214001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.016	10/23/25 21:21	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.016	10/23/25 21:21	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.016	10/23/25 21:21	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	10/23/25 21:21	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.016	10/23/25 21:21	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.016	10/23/25 21:21	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	10/23/25 21:21	
Decachlorobiphenyl (S)	%	69	73-118	10/23/25 21:21	SR
Tetrachloro-m-xylene (S)	%	76	59-94	10/23/25 21:21	

LABORATORY CONTROL SAMPLE: 3799352

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.16	0.13	81	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.16	0.13	81	57-108	
Decachlorobiphenyl (S)	%			73	73-118	
Tetrachloro-m-xylene (S)	%			79	59-94	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3800135 3800136

Parameter	Units	38014510001		3800136		MS % Rec	MSD % Rec	% Rec Limits	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result					
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.2	0.19	0.22	.17J	115	90	10-175	25
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.2	0.19	.14J	.13J	74	67	10-175	25
Tetrachloro-m-xylene (S)	%						82	78	59-94	

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QUALITY CONTROL DATA

Project: 2509117
Pace Project No.: 30816214

QC Batch: 776129	Analysis Method: SM 2540G-2015
QC Batch Method: SM 2540G-2015	Analysis Description: Dry Weight/Percent Moisture
	Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30816214001

SAMPLE DUPLICATE: 3785087

Parameter	Units	30815986001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	32.7	33.2	1	10	

SAMPLE DUPLICATE: 3785088

Parameter	Units	30815986002 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	27.2	26.6	2	10	

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REPORT OF LABORATORY ANALYSIS

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ENVIROCORP LABORATORIES INC.

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ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER

Kent County Waste Treatment Facility

Project: Biosolids - Monthly

139 Milford Neck Road

Project Number:

Milford, DE 19963

Reported: 11/30/2025 09:45

Analytical Results

Sample ID: Kentorganite **Sample Start:** 11/03/25 08:30
Lab ID: 2510047-01
Matrix: Solid **Received:** 11/03/25 10:31
Sample Type: Grab

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
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Microbiology

Salmonella	ND	#/4 g TS dry	1.39		EPA 1682	11/3/25 15:45	11/4/25 16:39	RD
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Inorganic

% Moisture	48.1	%	0.100		SM2540-G	11/4/25 8:09	11/4/25 08:09	HM
% Solids	51.9	%	0.100		SM2540-G	11/3/25 13:52	11/5/25 13:19	HM
Chloride	1660	mg/L	0.50		SM4500-Cl-C	11/26/25 15:34	11/26/25 15:42	MEM
Ammonia as N	0.05	% dry	0.004		SM4500-NH3-G	11/6/25 10:16	11/6/25 12:10	CK
Nitrite as N	0.0006	% dry	0.0001		SM4500-NO2-B	11/5/25 15:18	11/5/25 15:37	CK
Nitrate as N	0.000310	% dry	0.000193		[CALC]	11/6/25 10:16	11/6/25 12:11	CK
Nitrate+Nitrite as N	0.000938	% dry	0.0000963		SM4500-NO3-H	11/6/25 10:16	11/6/25 12:11	CK
Organic Nitrogen as N	1.42	% dry			[CALC]	11/13/25 11:44	11/13/25 17:47	CK
pH	11.98	SU			SM4500-H+/B	11/3/25 12:52	11/3/25 12:52	LAW
Total Kjeldahl Nitrogen	1.47	% dry	0.039		SM4500-Norg-C	11/13/25 11:44	11/13/25 17:47	CK
Total Nitrogen as N	1.48	% dry			[CALC]	11/13/25 11:44	11/13/25 17:47	CK
Total Phosphorus as P	0.327	% dry	0.0385		SM4500-P-F	11/13/25 11:44	11/13/25 14:11	CK
Volatile Solids	11.4	%	0.100		EPA 160.4	11/3/25 13:52	11/6/25 16:44	HM

Metals

Aluminum	2330	mg/kg dry	4.94		EPA 6010	11/14/25 9:00	11/14/25 16:19	JMW
Arsenic	3.95	mg/kg dry	0.494		EPA 6010	11/14/25 9:00	11/14/25 16:16	JMW
Cadmium	0.696	mg/kg dry	0.247		EPA 6010	11/14/25 9:00	11/14/25 16:16	JMW
Chromium	20.8	mg/kg dry	0.494		EPA 6010	11/14/25 9:00	11/14/25 16:16	JMW
Copper	147	mg/kg dry	0.494		EPA 6010	11/14/25 9:00	11/14/25 16:16	JMW
Iron	30700	mg/kg dry	4.94		EPA 6010	11/14/25 9:00	11/14/25 16:19	JMW
Potassium	0.238	% dry	0.0000494		EPA 6010	11/14/25 9:00	11/14/25 16:16	JMW
Molybdenum	5.32	mg/kg dry	0.494		EPA 6010	11/14/25 9:00	11/14/25 16:16	JMW
Sodium	777	mg/kg dry	0.494		EPA 6010	11/14/25 9:00	11/14/25 16:16	JMW
Nickel	11.4	mg/kg dry	0.494		EPA 6010	11/14/25 9:00	11/14/25 16:16	JMW
Lead	4.06	mg/kg dry	0.494		EPA 6010	11/14/25 9:00	11/14/25 16:16	JMW
Selenium	0.859	mg/kg dry	0.494		EPA 6010	11/14/25 9:00	11/14/25 16:16	JMW
Zinc	215	mg/kg dry	0.494		EPA 6010	11/14/25 9:00	11/14/25 16:16	JMW

Report Number
25-308-0029
Account Number
27155



2790 Whitten Road, Memphis, TN 38133
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51 Clark Street
Harrington, DE 19952

Page: 1 of 1

Project: Subcontract Order# 2510047

Purchase Order:

Report Date: 11/14/2025

Date Received: 11/04/2025

Date Sampled: 11/03/2025

REPORT OF ANALYSIS

Farm Name:
Lab Number: 82805
Sample ID: 2510047-01

Analysis	Result	Quantitation Limit	Method	Date and Time Test Started	Analyst
Neutralizing Value (%CCE) , %	58.5	0.1	AOAC 955.01	11/10/2025 15:04	DXT

Method Reference:
Official Methods of Analysis of AOAC International, 17th Edition, 1998

Comments:

A handwritten signature in black ink that reads "Connie Cook".

Connie Cook
Project Manager



ANALYTICAL RESULTS

Project: 2510047
Pace Project No.: 30823237

Sample: 2510047-01 **Lab ID: 30823237001** Collected: 11/03/25 08:30 Received: 11/04/25 10:15 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B Pace Analytical Services - Beaver								
Mercury	0.18	mg/kg	0.038	1	11/05/25 07:02	11/07/25 05:58	7439-97-6	
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546 Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	1.1	5	11/14/25 16:18	11/17/25 23:41	12674-11-2	ED,P1
PCB-1221 (Aroclor 1221)	ND	mg/kg	1.1	5	11/14/25 16:18	11/17/25 23:41	11104-28-2	ED,P1
PCB-1232 (Aroclor 1232)	ND	mg/kg	1.1	5	11/14/25 16:18	11/17/25 23:41	11141-16-5	ED,P1
PCB-1242 (Aroclor 1242)	ND	mg/kg	2.2	5	11/14/25 16:18	11/17/25 23:41	53469-21-9	ED,P1
PCB-1248 (Aroclor 1248)	ND	mg/kg	1.1	5	11/14/25 16:18	11/17/25 23:41	12672-29-6	ED,P1
PCB-1254 (Aroclor 1254)	ND	mg/kg	1.1	5	11/14/25 16:18	11/17/25 23:41	11097-69-1	ED,P1
PCB-1260 (Aroclor 1260)	ND	mg/kg	2.2	5	11/14/25 16:18	11/17/25 23:41	11096-82-5	ED,P1
PCB, Total	ND	mg/kg	1.1	5	11/14/25 16:18	11/17/25 23:41	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	93	%.	59-94	5	11/14/25 16:18	11/17/25 23:41	877-09-8	
Decachlorobiphenyl (S)	93	%.	73-118	5	11/14/25 16:18	11/17/25 23:41	2051-24-3	
Percent Moisture								
Analytical Method: SM 2540G-2015 Pace Analytical Services - Greensburg								
Percent Moisture	48.1	%	0.10	1		11/05/25 12:35		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2510047
 Pace Project No.: 30823237

QC Batch: 781755 Analysis Method: EPA 7471B
 QC Batch Method: EPA 7471B Analysis Description: BVR 7471B Mercury
 Laboratory: Pace Analytical Services - Beaver

Associated Lab Samples: 30823237001

METHOD BLANK: 3812741 Matrix: Solid
 Associated Lab Samples: 30823237001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	11/07/25 05:07	

LABORATORY CONTROL SAMPLE: 3812742

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.5	0.49	100	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3812743 3812744

Parameter	Units	3812743		3812744		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
Mercury	mg/kg	0.13	1.3	1.3	1.3	84	87	80-120	1	20	

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QUALITY CONTROL DATA

Project: 2510047
Pace Project No.: 30823237

QC Batch: 784088 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30823237001

METHOD BLANK: 3825204 Matrix: Solid
Associated Lab Samples: 30823237001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.016	11/17/25 22:58	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.016	11/17/25 22:58	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.016	11/17/25 22:58	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	11/17/25 22:58	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.016	11/17/25 22:58	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.016	11/17/25 22:58	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	11/17/25 22:58	
Decachlorobiphenyl (S)	%	81	73-118	11/17/25 22:58	
Tetrachloro-m-xylene (S)	%	79	59-94	11/17/25 22:58	

LABORATORY CONTROL SAMPLE: 3825205

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.16	0.14	84	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.16	0.15	89	57-108	
Decachlorobiphenyl (S)	%			83	73-118	
Tetrachloro-m-xylene (S)	%			78	59-94	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3825537 3825538

Parameter	Units	3825537		3825538		MS % Rec	MSD % Rec	% Rec Limits	Max RPD	Qual
		30822095006 Result	MS Spike Conc.	MSD Spike Conc.	MS Result					
PCB-1016 (Aroclor 1016)	mg/kg	<119 ug/kg	0.2	0.19	0.20	0.21	101	108	10-175	5 25
PCB-1260 (Aroclor 1260)	mg/kg	<33.6 ug/kg	0.2	0.19	.21J	.23J	107	120	10-175	25
Decachlorobiphenyl (S)	%						73	83	73-118	
Tetrachloro-m-xylene (S)	%						89	86	59-94	

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QUALITY CONTROL DATA

Project: 2510047
Pace Project No.: 30823237

QC Batch: 781930 Analysis Method: SM 2540G-2015
QC Batch Method: SM 2540G-2015 Analysis Description: Dry Weight/Percent Moisture
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30823237001

SAMPLE DUPLICATE: 3813557

Parameter	Units	30823335001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	20.2	21.7	7	10	

SAMPLE DUPLICATE: 3813558

Parameter	Units	30823338001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	52.2	44.9	15	10	D6

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REPORT OF LABORATORY ANALYSIS

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ENVIROCORP LABORATORIES INC.

51 CLARK STREET, HARRINGTON, DE 19952
302-398-4313
www.envirocorplabs.com


ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER
Kent County Waste Treatment Facility
Project: Biosolids - Monthly

139 Milford Neck Road

Project Number:

Milford, DE 19963

Reported: 12/16/2025 16:21

Analytical Results

Sample ID:	Kentorganite	Sample Start:	12/01/25 09:10
Lab ID:	2510998-01	Received:	12/01/25 10:51
Matrix:	Solid		
Sample Type:	Grab		

Analyte	Result	Units	Reporting Limit	Qualifier	Method	Date Prepared	Date Analyzed	Analyst
---------	--------	-------	-----------------	-----------	--------	---------------	---------------	---------

Microbiology

Salmonella	ND	#/4 g TS dry	1.36		EPA 1682	12/1/25 16:13	12/2/25 17:06	RD
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Inorganic

% Moisture	47.1	%	0.100		SM2540-G	12/2/25 8:57	12/2/25 08:57	HM
% Solids	52.9	%	0.100		SM2540-G	12/1/25 14:25	12/2/25 10:45	HM
Chloride	830	mg/L	0.50		SM4500-Cl-C	12/11/25 11:31	12/11/25 12:07	MEM
Ammonia as N	0.08	% dry	0.002		SM4500-NH3-G	12/4/25 10:38	12/4/25 11:46	CK
Nitrite as N	0.0007	% dry	0.00009		SM4500-NO2-B	12/3/25 15:36	12/3/25 15:42	CK
Nitrate as N	0.000191	% dry	0.000189		[CALC]	12/4/25 10:38	12/4/25 12:13	CK
Nitrate+Nitrite as N	0.000908	% dry	0.0000945		SM4500-NO3-H	12/4/25 10:38	12/4/25 12:13	CK
Organic Nitrogen as N	2.03	% dry			[CALC]	12/12/25 12:18	12/12/25 13:33	CK
pH	12.53	SU			SM4500-H+/B	12/2/25 13:46	12/2/25 13:46	JB
Total Kjeldahl Nitrogen	2.12	% dry	0.038		SM4500-Norg-C	12/12/25 12:18	12/12/25 13:33	CK
Total Nitrogen as N	2.12	% dry			[CALC]	12/12/25 12:18	12/12/25 13:33	CK
Total Phosphorus as P	0.445	% dry	0.0378		SM4500-P-F	12/12/25 12:18	12/12/25 13:35	CK
Volatile Solids	10.3	%	0.100		EPA 160.4	12/1/25 14:25	12/3/25 09:12	HM

Metals

Aluminum	1990	mg/kg dry	5.04		EPA 6010	12/9/25 9:00	12/9/25 15:44	JMW
Arsenic	7.64	mg/kg dry	0.504		EPA 6010	12/9/25 9:00	12/9/25 15:40	JMW
Cadmium	0.730	mg/kg dry	0.252		EPA 6010	12/9/25 9:00	12/9/25 15:40	JMW
Chromium	11.1	mg/kg dry	0.504		EPA 6010	12/9/25 9:00	12/9/25 15:40	JMW
Copper	146	mg/kg dry	0.504		EPA 6010	12/9/25 9:00	12/9/25 15:40	JMW
Iron	21300	mg/kg dry	5.04		EPA 6010	12/9/25 9:00	12/9/25 15:44	JMW
Potassium	0.351	% dry	0.0000504		EPA 6010	12/9/25 9:00	12/9/25 15:40	JMW
Molybdenum	ND	mg/kg dry	0.504		EPA 6010	12/9/25 9:00	12/9/25 15:40	JMW
Sodium	760	mg/kg dry	0.504		EPA 6010	12/9/25 9:00	12/9/25 15:40	JMW
Nickel	5.49	mg/kg dry	0.504		EPA 6010	12/9/25 9:00	12/9/25 15:40	JMW
Lead	4.42	mg/kg dry	0.504		EPA 6010	12/9/25 9:00	12/9/25 15:40	JMW
Selenium	0.559	mg/kg dry	0.504		EPA 6010	12/9/25 9:00	12/9/25 15:40	JMW
Zinc	246	mg/kg dry	0.504		EPA 6010	12/9/25 9:00	12/9/25 15:40	JMW



2790 Whitten Road, Memphis, TN 38133
 Main 901.213.2400 ° Fax 901.213.2440
 www.waypointanalytical.com

27155
 Envirocorp Inc
 51 Clark Street
 Harrington , DE 19952

Project Order 2510998
 Information : Kentorganite

Report Date : 12/12/2025
 Received : 12/02/2025

Connie Cook

Report Number : **25-336-0092**

REPORT OF ANALYSIS

Connie Cook
 Project Manager

Lab No : **90215**

Matrix: **Solids**

Sample ID : **2510998-01 - Kentorganite**

Sampled: **12/1/2025 09:10**

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Method
Neutralizing Value (%CCE)	63.6	%	0.1	1	12/09/25 16:23	DXT	AOAC 955.01

**Qualifiers/
 Definitions**

DF

Dilution Factor

ML

Method Quantitation Limit



ANALYTICAL RESULTS

Project: 2510998
Pace Project No.: 30829842

Sample: 2510998-01 **Lab ID: 30829842001** Collected: 12/01/25 09:10 Received: 12/02/25 10:00 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 7471B Mercury								
Analytical Method: EPA 7471B Preparation Method: EPA 7471B Pace Analytical Services - Beaver								
Mercury	0.15	mg/kg	0.038	1	12/04/25 00:53	12/04/25 06:23	7439-97-6	
8082A GCS PCB								
Analytical Method: EPA 8082A Preparation Method: EPA 3546 Pace Analytical Services - Greensburg								
PCB-1016 (Aroclor 1016)	ND	mg/kg	1.2	5	12/09/25 13:15	12/13/25 01:03	12674-11-2	ED,P1
PCB-1221 (Aroclor 1221)	ND	mg/kg	1.2	5	12/09/25 13:15	12/13/25 01:03	11104-28-2	ED,P1
PCB-1232 (Aroclor 1232)	ND	mg/kg	1.2	5	12/09/25 13:15	12/13/25 01:03	11141-16-5	ED,P1
PCB-1242 (Aroclor 1242)	ND	mg/kg	2.4	5	12/09/25 13:15	12/13/25 01:03	53469-21-9	ED,P1
PCB-1248 (Aroclor 1248)	ND	mg/kg	1.2	5	12/09/25 13:15	12/13/25 01:03	12672-29-6	ED,P1
PCB-1254 (Aroclor 1254)	ND	mg/kg	1.2	5	12/09/25 13:15	12/13/25 01:03	11097-69-1	ED,P1
PCB-1260 (Aroclor 1260)	ND	mg/kg	2.4	5	12/09/25 13:15	12/13/25 01:03	11096-82-5	ED,P1
PCB, Total	ND	mg/kg	1.2	5	12/09/25 13:15	12/13/25 01:03	1336-36-3	
Surrogates								
Tetrachloro-m-xylene (S)	90	%	59-94	5	12/09/25 13:15	12/13/25 01:03	877-09-8	
Decachlorobiphenyl (S)	78	%	73-118	5	12/09/25 13:15	12/13/25 01:03	2051-24-3	
Percent Moisture								
Analytical Method: SM 2540G-2015 Pace Analytical Services - Greensburg								
Percent Moisture	48.1	%	0.10	1		12/04/25 11:18		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 2510998
Pace Project No.: 30829842

QC Batch: 787395 Analysis Method: EPA 7471B
QC Batch Method: EPA 7471B Analysis Description: BVR 7471B Mercury
Laboratory: Pace Analytical Services - Beaver

Associated Lab Samples: 30829842001

METHOD BLANK: 3841828 Matrix: Solid
Associated Lab Samples: 30829842001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/kg	ND	0.020	12/04/25 05:33	

LABORATORY CONTROL SAMPLE: 3841829

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.5	0.50	100	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3841830 3841831

Parameter	Units	30820240001		3841830		3841831		% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec				
Mercury	mg/kg	ND	12.3	12.3	10.7	10.8	88	89	80-120	1	20 H1

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QUALITY CONTROL DATA

Project: 2510998
Pace Project No.: 30829842

QC Batch: 788390 Analysis Method: EPA 8082A
QC Batch Method: EPA 3546 Analysis Description: 8082A GCS PCB
Laboratory: Pace Analytical Services - Greensburg

Associated Lab Samples: 30829842001

METHOD BLANK: 3846739 Matrix: Solid
Associated Lab Samples: 30829842001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.016	12/10/25 13:00	
PCB-1221 (Aroclor 1221)	mg/kg	ND	0.016	12/10/25 13:00	
PCB-1232 (Aroclor 1232)	mg/kg	ND	0.016	12/10/25 13:00	
PCB-1242 (Aroclor 1242)	mg/kg	ND	0.033	12/10/25 13:00	
PCB-1248 (Aroclor 1248)	mg/kg	ND	0.016	12/10/25 13:00	
PCB-1254 (Aroclor 1254)	mg/kg	ND	0.016	12/10/25 13:00	
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.033	12/10/25 13:00	
Decachlorobiphenyl (S)	%	83	73-118	12/10/25 13:00	
Tetrachloro-m-xylene (S)	%	78	59-94	12/10/25 13:00	

LABORATORY CONTROL SAMPLE: 3846740

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	mg/kg	0.16	0.14	83	66-108	
PCB-1260 (Aroclor 1260)	mg/kg	0.16	0.15	89	57-108	
Decachlorobiphenyl (S)	%			86	73-118	
Tetrachloro-m-xylene (S)	%			79	59-94	

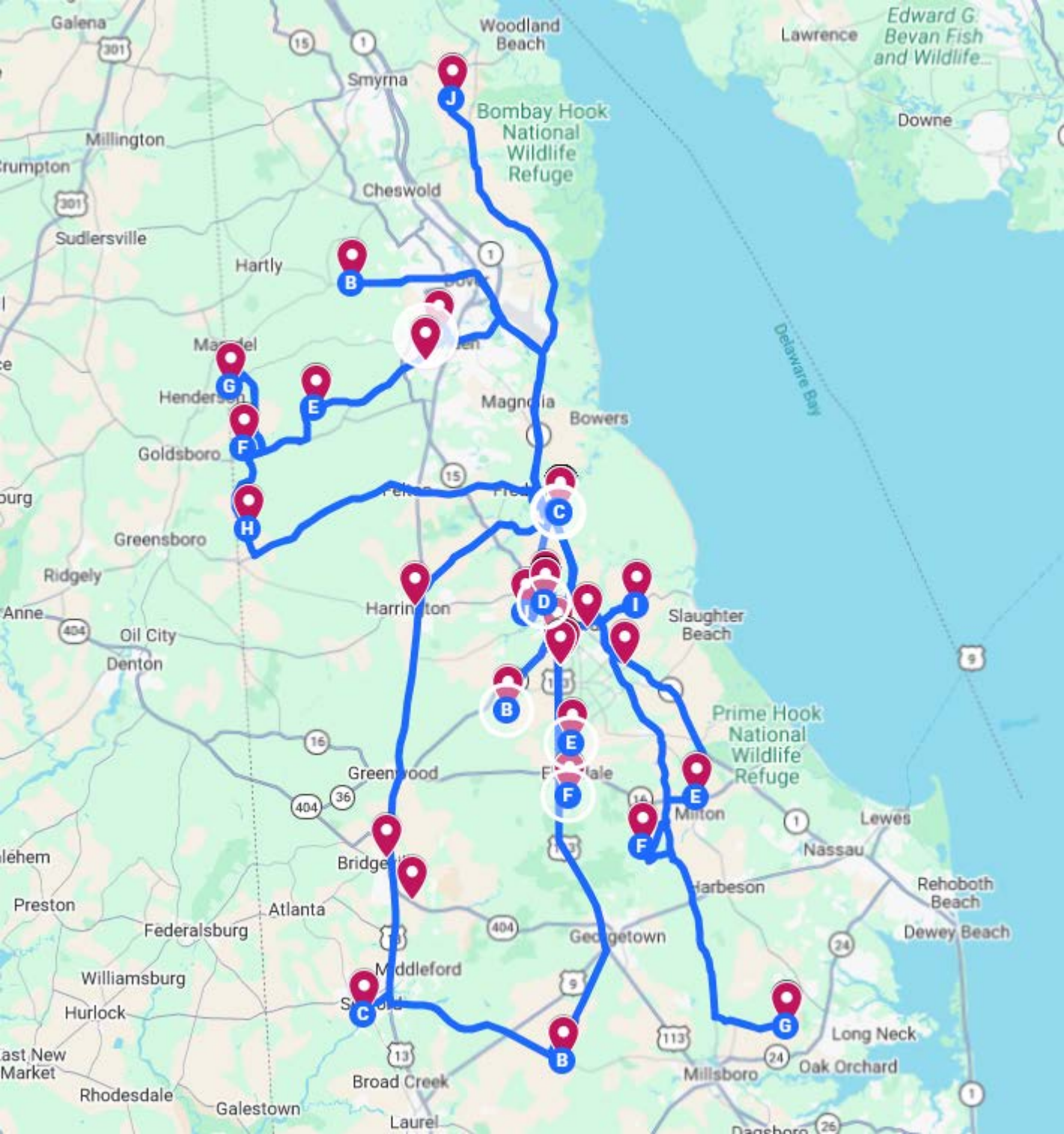
MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3846741 3846742

Parameter	Units	3846741		3846742		MS % Rec	MSD % Rec	% Rec Limits	Max RPD	Qual
		30831591001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result					
PCB-1016 (Aroclor 1016)	mg/kg	ND	0.21	0.2	0.16	0.16	76	77	10-175	0 25
PCB-1260 (Aroclor 1260)	mg/kg	ND	0.21	0.2	0.18	0.17	87	83	10-175	6 25
Decachlorobiphenyl (S)	%						77	71	73-118	
Tetrachloro-m-xylene (S)	%						79	75	59-94	

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Kent Organite Customer List

Name or Corp Name	First Name / Initial	Address	City	Zip	Phone
Alexander	Jeff	267 Cabin Ridge Road	Felton	19943	302-632-6303
Alexander	Mike				
Ammons	Martin L.	PO Box 507	Delmar	19940	443-359-0831
Argo	Alex	701 Bloomfield Drive	Harrington	19952	302-422-7157
Ashley	Rich	542 Sportsman Road	Felton	19943	302-270-6480
Betts	Wm	17818 Shoemaker Dr	Georgetown	19947	302-604-2548
Beachy	Freeman	436 Halltown Road	Marydel	19964	
Blanton	Dale	5600 Willow Grove Road	Wyoming	19934	
Bowden	William	26423 Avalon Road	Georgetown	19947	302-228-9313 302-856-4181
Brandenburg	Tom`	2435 Hickman Rd	Greenwood	19950	443-510-2447
Bowman	Jim	960 Bowman Road	Milford	19963	302-233-2820
Breeding	Chris	361 Tomahawk Road	Greenwood	19950	
Breeding	Douglas	11663 Windmill Lane	Lincoln	19960	302-422-6922
Bullock	Michael W	1201 Bullock Rd	Harrington	19952	302-398-3896 302-270-6272c
Butler	Ralph	1649 Butler Rd	Harrington	19952	
Byler	Rudy	Box 54	Kenton	19955	

Kent Organite Customer List

Name or Corp Name	First Name / Initial	Address	City	Zip	Phone
Byler	Henry	767 Victory Chapel Road	Dover	19904	
Cain	Mike	8327 Vernon Road	Harrington	19952	302-270-8681
Charles West Farms	-----	2953 Tub Mill Pond Road	Milford	19963	
Chorman	Dennis	28118 Washington Street Ext	Millsboro	19966	302-934-1942
Collins	Alton	20 Collins Road	Harrington	19952	
Couden	Dewitt	3992 Westville Rd	Wyoming	19934	
Davis	Mark	18655 Piper Lane	Ellendale	19941	302-422-1861 302-245-0045
Davis	Bill	29 Willow Tree Circle	Camden	19934	
Davis	Marvin	1557 New Wharf Road	Milford	19963	
Dill	Eugene	24108 Still road	Wyoming	19934	302-270-2258
Dorman	Sonny	22650 Dorman Road	Lewes	19958	302-841-9290
Evans	David	389 Deer Valley Road	Harrington	19952	302-422-2873
Evans Farms LLC	Kevin Evans	9843 Seashore Hwy	Bridgeville	19933	302-337-8130 302-542-6672
Farrow	Lowell	251 Briar Bush Road	Magnolia	19962	302-670-2457
Fitzgerald	Jack	Route 113	Lincoln	19960	
Fox	Daniel	17794 Oak Hill Dr	Milford	19963	

Kent Organite Customer List

Name or Corp Name	First Name / Initial	Address	City	Zip	Phone
Fox	Duane	809 New St	Milford	19963	
Fox	Val	18656 Johnson Road	Lincoln	19960-2633	
Hill	Marvin	2007 School Street	Houston	19954	302-228-9839
Hill	Chris	1243 Holly Hill Road	Milford	19963	
Hopkins	Eric	572 Dulany Ine Rd	Clayton		302-653-4538
Hines	Kimley	11414 Whearfield Road	Greenwood	19950	302-381-4539
Hopkins	William	4991 Mills Rd	Milford	19963	
H. Wilkins & Sons	-----	7630 Wilkins Road	Lincoln	19960-2616	
Hutchins	Donald	2987 Sandtown Road	Felton	19943	
Hutson	Jim	300 Morgan Choice Road	Wyoming	19934	302-252-8009
Ingram	Gary	102 Minner Road	Milford	19963	
Jarman	LeRoy	1807 Darling Farm Road	Camden	19934	
Keller	Larry	200 Robbins Road	Frederica	19946	
King	Raymond	3039 Pearsons Corner Rd	Dover	19904	302-492-0197 302-492-8975F
Klinkenborg	Joel	6748 Westville Road	Hartly	19953	
Kohout	John	683 Hartly Rd	Hartly	19953	302-222-4227

Kent Organite Customer List

Name or Corp Name	First Name / Initial	Address	City	Zip	Phone
Krupka	Edward	1079 Lockwood Chapal Rd	Hartly	19953	302-270-1878
Krupka	Chuck	961 Lockwood Chapel Road	Hartly	19953	
Legacy Farms	c/o Mark Wilson	565 Hurd Road	Smyrna	19977	
Law	Jack	142 Semmental Meadows	Marydel	19964	
Lawson	Dave	2257 Westville Rd	Marydel	19964	302-744-4237
Long	Robert	2277 Tower Road	Hartly	19953-1958	
Maloney	Barry	3277 Milford Neck Road	Milford	19963	
McCloskey	Richard	957 Mid State Road	Felton	19943	302-745-1078
McCloskey	Randy				302-745-9724
Morris	John	1733 Farm Lane	Wyoming	19943	302-331-1800
McDougall	Paul	1986 Cedar Grove Church Rd	Felton	19943	302-632-9163
Mast	Benjamin	5224 Pearsons Corner Road	Dover	19904	
Mast	Henry	2397 Sandy Bend Road	Camden	19934	
McCauley	Dennis	10480 North Old State Road	Lincoln	19960	302-228-7209
Mersky	Harold	c/o Gene Dill, 2408 Still Road	Camden	19934	
Miller	Adam	1780 Yoder Dr	Hartly	19953	302-492-8303

Kent Organite Customer List

Name or Corp Name	First Name / Initial	Address	City	Zip	Phone
Miller	David	723 Brittney Lane	Hartly	19953	
Miller	Ervin	926 W Denneys Road	Dover	19904	
Miller	Jon	2870 John Hurd Road	Felton	19943	
Miller	Jonathan E	155 T and B Lane	Wyoming	19934	302-883-1240
Miller	William Ray	6702 Westville Road	Haryly	19953	
Miller's Butcher Shop		577 Morgan's Choice Road	Wyoming	19934	
M J Webb Farms LLC	c/o Michael Webb	12608 Webb Farm Rd	Greenwood	19950	302-349-4453 302-363-2075
Moore	John	2559 Canterbury Milford Rd	Milford	19963	
Morgan	Douglas	18024 Johnson Rd	Lincoln	19960	302-233-8242
Morgan	Richard	10187 Dupont Blvd	Lincoln	19960	302-841-8047
Morgan	William	9119 N. Old StAte Rd	Lincoln	19960	302-381-5211
Nagyiski	John	1990 Sportsman Road	Felton	19943	
Ockels Farm Inc	c/oDale Ockels	17120 Ockeeks Lane	Milton	19968	302-684-0456
O'Toole	Jon	994 Fork Landing Rd	Milford	19963	
Nye	Bruce	2573 Woodlytown Rd	Magnolia	19962	302-242-3402 302-697-8878
Palmer	Danny	4664 Mudmill Rd	Wyoming	19934	

Kent Organite Customer List

Name or Corp Name	First Name / Initial	Address	City	Zip	Phone
Passwaters Landscaping LLC		18956 Sussex Hwy	Bridgeville	19933	302-227-5296 302-542-8077
Peabody-Bane	Arline	1311 Fox Hole Rd	Wyoming	19934	302-492-1700 302-359-4334C
Peterman	Bryan	5522 Westville Road	Hartly	19953	
Peterman	David	567 Oak Point School Road	Wyoming	19934	
Rigby	Mike	2741 Westville Road	Marydel	19964	
Sapp Jr	Richard	12698 Union Street Ext	Milton	19968	
Sapp Sr	Richard				
Ricland Farms LLC		23728 Chapel Branch Rd	Seaford	19973	3027457688
Robbins	Ronald & Margaretta	543 Church Hill Road	Milford	19963	302-242-0856
Rogers	Elmer	20474 Clam Shell Road	Georgetown	19947	302-423-7732
Roles	Dean	22000 Heritage Farm Road	Bridgeville	19933	
Rossa	Jacob	903 Rosa Rd	Milford	19963	
Schepens	Neil	436 Grygo Road	Marydel	19964	
Schlabaugh	Titus	11123 Woods Ln	Greenwood	19950	
Scuse	George	1762 Smyrna Leipsic Road	Smyrna	19977	
Short	Clifford	606 East Market Street	Georgetown	19947	302-249-1527

Kent Organite Customer List

Name or Corp Name	First Name / Initial	Address	City	Zip	Phone
Staats	Ray	1570 VanDyke Greenspring Road	Smyrna	19977	302-382-0043
Stayton	Grier	16041 Staytonville Road	Lincoln	19960	302-242-3702
Sterling	Richard	1575 VanDyke Greenspring Road	Smyrna	19977	
Steward	Arthur	333 Cedar Grove Church Road	Harrington	19952	302-284-0514
Strachar	Joe	1445 Hills Market Rd	Harrington	19952	302-284-4259 302-272-0516 c
Syester Farms Inc	Skip Syester	909 Beebe Rd	Harrington	19952	302-398-9563 302-542-6807
Twin Maple Farms	Roger Swartzentuber	12897 Menonite School Road	Greenwood	19950	302-542-9087
T.A. Farms	Dan Palmer	4664 Mudmill Road	Wyoming	19934	302-242-4930 302-492-3030
Taraila	Raymond	48 Philcrest Drive	Dover	19901	302-632-8563
Thompson	Douglas	1894 Holly Springs RD	Felton	19943	302-632-6181
Thompson	John L.	2324 Milford Neck Road	Milford	19963	
Tigner	John	2582 Authersville Rd	Hartly	19953	
Trader	Kathleen	16153 Beach Highway	Ellendale	19941	
Unruh	Aubrey	240 Daughters Lane	Hartly	19953	302-492-1584
Vasey	Dean	7047 Horse Cart Lane	Lincoln	19960	302-745-2222
Vincent	Rick	2729 Hopkins Cemetary Rd	Harrington	19952	302-398-3740 302-242-4338

Kent Organite Customer List

Name or Corp Name	First Name / Initial	Address	City	Zip	Phone
Wagner	Roy E.	2744 Todds Chapel Road	Greenwood	19950	
Walls (DECEASED)	Bill	1973 Thompsonville Road	Milford	19963	
Walton	William	707 State Street	Ellendale	19941	
Warner	Larry	578 Bowman Road	Milford	19963	302-242-1001
Warrington	Nelson	695 Hunting Quarter Road	Houston	19954	
Wright	Dallas	28272 Warrick Rd	Millsboro	19966	302-542-3401
Wells	J. Carlton	24868 Broadkill Road	Milton	19968	302-336-1536
Wilkerson	Norman	1161 Pearson Corner Road	Hartly	19953	302-242-5440
Willis	Bill	677 Lake Drive West	Smyrna	19977	302-270-0150
Wilson	Dave	PO Box 84	Lincoln	19960	302-270-8707
Wilson	Mark	565 Hurd Road	Smyrna	19977	302-242-2824
Wintjen	Louis	8083 N Old State Road	Lincoln	19960	
Woikoski Farms, Inc	-----	542 Sportsman Road	Felton	19943	302-270-6480
Woodall	Norman	3296 Andrews ville Road	Greenwood	19950	
Wyatt	Dennis	19800 Reynolds Pond Road	Ellendale	19941	302-422-8634
Yoder	Owen	5012 Pearsons Corner Road	Dover	19904	

Kent Organite Customer List

Name or Corp Name	First Name / Initial	Address	City	Zip	Phone
Yoder	Rufus	140 Crystal Road	Hartly	19953	302-492-8525