

US EPA ARCHIVE DOCUMENT



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March 10, 1997

**MEMORANDUM**

**TO:** Anita Cummings  
**FROM:** Howard Finkel  
**SUBJECT:** Final Revised Calculation of Treatment Standards Using Data Obtained From Rollins Environmental's Highway 36 Commercial Waste Treatment Facility and GNB's Frisco, Texas Waste Treatment Facility

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I followed the methodology presented in "Final Best Demonstrated Available Technology (BDAT) Background Document For Quality Assurance/Quality Control Procedures and Methodology," dated October 23, 1991 to evaluate the data obtained from both Rollins and GNB. Attachment 1 presents a summary of all the data without any data manipulation.

As the first step, I removed data that either (1) did not have both untreated (influent) and treated (effluent) characterization results, or (2) had effluent concentrations that were equal to, or greater than the influent concentrations.

In the second step, I used the Z-score test, as described in Attachment A-1 of the background document, to remove all values that fell outside of the -2.0 to +2.0 range. Based on the Z-score outlier test, I removed one antimony value, one arsenic value, one barium value, two cadmium values, two chromium values, two lead values, one nickel value, one selenium value, two silver values, and one thallium value.<sup>1</sup> Attachment 2 presents a summary of the Z-score analysis.

I then used the BDAT methodology to calculate variability factors and treatment standards. Specifically, I followed Appendix D - Variability Factor to estimate the daily

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<sup>1</sup> A second zinc value was removed because the [effluent] was more than 50 times higher than the next highest data point and, based on engineering judgement, suggested incomplete treatment.

maximum variability factor using both Rollins' and GNB's data. Following this procedure, I used equation [1], on page D-1 to calculate VF:

$$VF = \frac{C_{99}}{\text{Mean}}$$

Where:

$$C_{99} = EXP(y + 2.33 * Sy)$$

y = the mean of the logtransformed (natural log) data  
Sy = the standard deviation of the logtransformed (natural log) data  
Mean = the average of the individual performance values.

As noted on page D-2 of the background document, "For residuals with concentrations that are not all below the detection limit, the 99th percentile and the mean can be estimated using equation 1". However, in cases where all of the data are reported as non-detects, I assumed that the actual values were the same as the detection limits to calculate the mean values, and then applied the standard VF of 2.8.

The treatment standard for each constituent was then calculated by taking the product of the variability factor and mean constituent concentration. Attachment 3 presents both the variability factors and treatment standards calculated using both Rollins' and GNB's data - minus the outliers, sets of data that did not have both untreated and treated data, and sets of data where the effluent was equal to or greater than the influent concentrations.

Attachment 4 presents a summary exhibit to document the final calculations and results for the combined data set (Rollins and GNB). Attachment 5 presents a comparison of the treatment standards for stabilization and HTMR. Attachment 6 presents the hand calculations conducted for chromium.

If you have any questions regarding the attached analyses, please call me at (703) 934-3656.

attachments

## **ATTACHMENT 1**

## TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- All Data

| Samples     | Waste    | Antimony<br>Treated | (LN)    | Arsenic<br>Treated | (LN)    | Raw     | Barium<br>Treated | (LN)    | Beryllium<br>Treated | (LN)    | Raw      | Cadmium<br>Treated | (LN)     |       |
|-------------|----------|---------------------|---------|--------------------|---------|---------|-------------------|---------|----------------------|---------|----------|--------------------|----------|-------|
| 1 C-825     |          | 0.0897              | -2.4113 | <                  | 0.0304  | v       | 0.0304            | -3.4933 | 0.1970               | -1.6246 | 0.0014   | -6.5713            | v 0.0050 |       |
| 2 WP-11262  | < 0.0255 | < 0.0255            | -3.6691 | <                  | 0.0304  | v       | 0.0304            | -3.4933 | 0.3930               | -0.9339 | v 0.0118 | v 0.0050           | v 0.0050 |       |
| 3 WP-10073  | 3.4800   | 0.0428              | -3.1512 | 0.4420             | v       | 0.0304  | -3.4933           | 3.7200  | 0.3690               | -0.9670 | <        | 0.0500             | v 0.0050 |       |
| 4 C-833     |          | 0.0270              | -3.6119 | v                  | 0.0304  | v       | 0.0304            | -3.4933 | 0.8000               | -0.2231 | v v v    | v v v              | v v v    |       |
| 5 C-832     | v        | 0.0255              | -3.6691 | v                  | 0.0304  | v       | 0.0304            | -3.4933 | 0.9620               | -0.0387 | v v v    | v v v              | v v v    |       |
| 6 C-828     | v        | 0.0421              | -3.1677 | v                  | 0.0304  | v       | 0.0304            | -3.4933 | 0.7320               | -0.3120 | v v v    | v v v              | v v v    |       |
| 7 C-830     | v        | 0.0255              | -3.6691 | v                  | 0.0304  | v       | 0.0304            | -3.4933 | 0.8420               | -0.1720 | v v v    | v v v              | v v v    |       |
| 8 WP-10076  | 3.1300   | 0.0499              | -2.9877 | 0.4340             | v       | 0.0304  | -3.4933           | 0.2470  | 0.3160               | -1.1520 | v v v    | v v v              | v v v    |       |
| 9 WP-10081  | 16.1000  | 0.0382              | -3.2849 | 2.0300             | v       | 0.0304  | -3.4933           | 0.0764  | 0.2970               | -1.2140 | v v v    | v v v              | v v v    |       |
| 10 WP-7397  | 0.8100   | 0.0411              | -3.1917 | <                  | 0.0304  | v       | 0.0304            | -3.4933 | 13.5000              | 0.6480  | -0.4339  | v v v              | v v v    | v v v |
| 11 WP-6458  |          |                     |         |                    | 0.0482  | v       | 0.0995            | -2.3076 | 0.2280               | 0.2880  | -1.2448  | v v v              | v v v    | v v v |
| 12 WP-1731  |          |                     |         |                    | 2.5200  | v       | 0.0176            | -4.0399 | 0.2400               | 0.4158  | -0.8776  | v v v              | v v v    | v v v |
| 13 WP-12967 | 0.4210   | 0.0590              | -2.8902 | v                  | 0.0300  | v       | 0.0330            | -3.4112 | 1.6700               | 1.1800  | 0.1655   | v v v              | v v v    | v v v |
| 14 WP-1772  | 0.5970   | < 0.0200            | -3.9120 | v                  | 0.0300  | v       | 0.0300            | -3.5056 | 0.2450               | <       | 0.0100   | -4.6052            | 0.0160   | v v v |
| 15 WP-10078 | 0.2350   |                     | -1.2483 | v                  | 0.4890  | v       | 0.0304            | -3.4933 | 0.1450               | 0.5430  | -0.6106  | v v v              | v v v    | v v v |
| 16 WP-7124  |          |                     |         |                    | 1.3100  | v       | 0.0534            | -2.9299 | 2.3200               | 0.3650  | -1.0079  | v v v              | v v v    | v v v |
| 17 C-473    |          | 0.0365              | -3.3104 | v                  | 0.0304  | v       | 0.0304            | -3.4933 | 0.3110               | 1.1680  | v v v    | v v v              | v v v    | v v v |
| 18 WP-6795  |          |                     |         |                    | 0.5000  | v       | 0.0304            | -3.4933 | 0.2940               | 1.1500  | 0.1398   | v v v              | v v v    | v v v |
| 19 WP-6797  |          |                     |         |                    | v       | 0.0304  | v                 | -3.4933 | 0.1960               | 0.7310  | -0.3133  | v v v              | v v v    | v v v |
| 20 WP-6798  |          |                     |         |                    | 0.1310  | v       | 0.0304            | -3.4933 | 0.1840               | 0.6350  | -0.4541  | v v v              | v v v    | v v v |
| 21 C-992    |          | 0.0690              | -2.6736 | v                  | 0.0300  | v       | 0.0300            | -3.5056 | 0.4650               | -0.7700 | v v v    | v v v              | v v v    | v v v |
| 22 WP-6458  |          |                     |         |                    | 0.0482  | v       | 0.0995            | -2.3076 | 0.2280               | 0.2880  | -1.2448  | v v v              | v v v    | v v v |
| 23 WP-7393  | 0.8100   | 0.0411              | -3.1917 | v                  | 0.0304  | v       | 0.0304            | -3.4933 | 13.5000              | 0.6480  | -0.4339  | v v v              | v v v    | v v v |
| 24 WP-12651 | < 0.0300 | v                   | -3.5066 | v                  | 3.0000  | v       | 0.0300            | -3.5056 | 1.0000               | 0.2800  | -0.2311  | v v v              | v v v    | v v v |
| 25 C-1454   |          | 0.0520              | -2.9565 | v                  |         |         | 0.0300            | -3.5056 | 0.3230               | -1.1301 | 0.0500   | v v v              | v v v    | v v v |
| 26 C-1448   |          | 1.8400              | 0.6098  | v                  | 0.4290  | v       | 0.4290            | -0.8463 | 0.4450               | -0.8097 | v v v    | v v v              | v v v    | v v v |
| 27 C-1456   |          | 0.0460              | -3.0791 | v                  |         |         | 0.0300            | -3.5056 | 0.4170               | -0.8747 | v v v    | v v v              | v v v    | v v v |
| 28 C-1458   |          |                     |         |                    | 9.8900  | 2.2915  | 1.2000            | 0.1823  | 0.6300               | -0.4620 | v v v    | v v v              | v v v    | v v v |
| 29 WP-11504 | v        | 0.0300              | 0.0490  |                    | 0.0159  | 0.1790  | 0.3090            | -1.1744 | 0.0450               | 0.3630  | -1.0134  | v v v              | v v v    | v v v |
| 30 WP-13041 | v        | 0.0300              | v       |                    | 0.0300  | 0.5066  | 0.5220            | v       | 0.0300               | -3.5056 | 0.190    | 1.1500             | 0.1398   | v v v |
| 31 WP-1470  | 0.4340   | 0.0440              | -3.1236 | v                  | 33.1000 | 0.3200  | -1.1384           | 0.1100  | 0.7260               | -0.3202 | 0.0080   | v v v              | v v v    | v v v |
| 32 WP-6766  |          |                     |         |                    | v       | 3.0400  | 0.0563            | -2.8771 | 0.1400               | 0.8150  | -0.2046  | v v v              | v v v    | v v v |
| 33 WP-8036  |          |                     |         |                    | v       | v       | 0.0304            | -3.4933 | 0.1400               | 0.9000  | -0.1054  | v v v              | v v v    | v v v |
| 34 WP-7280  |          |                     |         |                    | v       | v       | 0.0304            | -3.4933 | 0.3200               | 0.7830  | -0.2446  | v v v              | v v v    | v v v |
| 35 WP-6969  |          |                     |         |                    | v       | 0.0304  | 0.0486            | -3.0241 | 0.0739               | 0.3570  | -1.0300  | v v v              | v v v    | v v v |
| 36 WP-1672  | v        | 0.0178              | -4.0286 | 1.1000             | v       | 0.0176  | v                 | -3.0399 | 0.5800               | 0.4933  | -0.7066  | v v v              | v v v    | v v v |
| 37 C-491    |          | 0.0496              | -3.0038 | v                  |         | 0.0304  | v                 | -3.4933 | 0.7800               | -0.2485 | v v v    | v v v              | v v v    | v v v |
| 38 C-484    |          | 0.0587              | -2.8353 | v                  | 0.3100  | -1.1712 | v                 | 0.4080  | -0.8965              | 0.6910  | -0.3696  | v v v              | v v v    | v v v |
| 39 C-470    |          | 0.0476              | -3.0449 | v                  | 0.0581  | -2.8456 | v                 | 0.0320  | -3.4420              | 0.7580  | -0.2256  | v v v              | v v v    | v v v |
| 40 C-480    |          | 0.0407              | -3.2015 | v                  | 0.4170  | -0.8747 | v                 | 0.5850  | -0.4810              | 0.4710  | -0.7744  | v v v              | v v v    | v v v |
| 41 C-489    |          | 0.0482              | -3.0324 | v                  | 0.2990  | -1.2073 | v                 | 0.6520  | -0.4277              | 0.6520  | -0.4277  | v v v              | v v v    | v v v |
| 42 C-495    |          | 0.1170              | -2.1456 | v                  | 0.4080  | -0.8965 | v                 | 0.6910  | -0.3696              | 0.7290  | -0.3538  | v v v              | v v v    | v v v |
| 43 C-1002   |          | 0.0480              | -3.0366 | v                  | 0.0320  | -3.4420 | v                 | 0.7020  | -0.2530              | 0.5850  | -0.6361  | v v v              | v v v    | v v v |
| 44 WP-12111 | 0.2440   | < 0.0300            | -3.5066 | v                  | 0.0300  | -3.3242 | v                 | 0.0300  | -3.5066              | 0.5350  | -0.6255  | v v v              | v v v    | v v v |
| 45 C-896    | 0.0500   | -2.9857             | v       |                    | 0.0300  | -3.5066 | v                 | 0.0300  | -3.5066              | 0.5200  | -0.6539  | v v v              | v v v    | v v v |
| 46 C-906    |          | 0.0350              | -3.3524 | v                  | 0.0410  | -3.1942 | v                 | 0.6130  | -0.4894              | 0.6130  | -0.4894  | v v v              | v v v    | v v v |
| 47 C-912    |          |                     |         |                    |         |         |                   |         |                      |         |          | v v v              | v v v    | v v v |

TCLP Data Provided By Rollins Environmental and GNB (mg/l) -- All Data

| Samples   | Waste   | Antimony Treated |         | Arsenic Treated |         | Barium Treated |         | Beryllium Treated |         | Cadmium Treated |           |
|-----------|---------|------------------|---------|-----------------|---------|----------------|---------|-------------------|---------|-----------------|-----------|
|           |         | Raw              | (LN)    | Raw             | (LN)    | Raw            | (LN)    | Raw               | (LN)    | Raw             | (LN)      |
| 48        | C-918   | 0.6480           | -0.4339 | v               | 0.0300  | -3.5066        | 0.6240  | -0.4716           | v       | 0.0050          | -5.2983   |
| 49        | C-925   | 0.0460           | -3.0791 | v               | 0.0300  | -3.5066        | 0.7610  | -0.2731           | v       | 0.0050          | -5.2983   |
| 50        | C-935   | 0.0580           | -2.8473 | v               | 0.0300  | -3.5066        | 0.7450  | -0.2944           | v       | 0.0050          | -5.2983   |
| 51        | C-1198  | 0.0360           | -3.3242 | v               | 0.0300  | -3.5066        | 0.8620  | -0.1602           | v       | 0.0050          | -5.2983   |
| 32        | C-1203  | 0.0600           | -2.8134 | v               | 0.0300  | -3.5066        | 0.9120  | -0.0921           | v       | 0.0050          | -5.2983   |
| 53        | C-1281  | 0.0480           | -3.0366 | v               | 0.0370  | -3.2968        | 0.4330  | -0.8370           | v       | 0.0050          | -5.2983   |
| 54        | C-1299  | 0.0460           | -3.0791 | v               | 0.0300  | -3.5066        | 0.6740  | -0.3945           | v       | 0.0050          | -5.2983   |
| 55        | C-980   | 0.0340           | -3.3814 | v               | 0.0300  | -3.5066        | 0.8500  | -0.1863           | v       | 0.0050          | -5.2983   |
| 56        | R-1731  | 0.0200           | 0.1240  | v               | 0.0280  | 0.8280         | v       | 0.0050            | v       | 0.0050          | -5.2983   |
| 57        | R-1731  | 0.0200           | 0.2080  | v               | 0.0200  | 0.8020         | v       | 0.0050            | v       | 0.0050          | -5.2983   |
| 58        | R-1731  | 0.0255           | 0.0304  | v               | 0.0304  | 0.3440         | v       | 0.0050            | v       | 0.0050          | -5.2983   |
| 59        | R-1731  | 2.5500           | 3.0400  | v               | 3.0400  | 0.3100         | v       | 0.0050            | v       | 0.0050          | -5.2983   |
| 60        | R-1731  | v                | 0.2100  | v               | 0.2100  | 0.2100         | v       | 0.0050            | v       | 0.0050          | -5.2983   |
| 61        | R-1731  | v                | 0.3890  | v               | 0.3890  | 0.3890         | v       | 0.0050            | v       | 0.0050          | -5.2983   |
| 62        | R-1731  | 0.0255           | 0.2810  | v               | 0.0237  | 0.2810         | v       | 0.0050            | v       | 0.0050          | -5.2983   |
| 63        | GNB-1   | v                | 0.0050  | -5.2983         | v       | 0.0050         | -5.2983 | 10.2000           | 2.5000  | 0.9163          | 0.0050    |
| 64        | GNB-2   | 0.1980           | v       | 0.0050          | -5.2983 | 0.8110         | v       | 0.0050            | -5.2983 | 82.0000         | 8.4000    |
| 65        | GNB-3   | 0.4000           | v       | 0.0050          | -5.2983 | 0.4000         | v       | 0.0050            | -5.2983 | 24.1000         | 8.9000    |
| 66        | GNB-4   | 0.1850           | v       | 0.0050          | -5.2983 | 0.1850         | v       | 0.0050            | -5.2983 | 16.9000         | 2.4000    |
| 67        | GNB-5   | 0.1590           | v       | 0.0050          | -5.2983 | 0.1590         | v       | 0.0050            | -5.2983 | 13.4000         | 2.6000    |
| 68        | GNB-6   | 0.1480           | v       | 0.0050          | -5.2983 | 0.1480         | v       | 0.0050            | -5.2983 | 11.4000         | 2.6000    |
| # of Obs: | 19      | 44               | 39      | 61              | 39      | 61             | 61      | 11                | 26      | 39              | 61        |
| # of NDs: | 9       | 8                | 44      | 17              | 41      | 5              | 1       | 9                 | 25      | 8               | 54        |
| Minimum:  | 0.0200  | 0.0178           | 4.0286  | 0.0300          | 0.0050  | -5.2983        | 0.0100  | -4.6052           | 0.0014  | 6.5713          | 0.0013    |
| Mean:     | 1.6836  | 0.3285           | 2.8582  | 1.6377          | 0.0881  | -3.2631        | 5.1676  | 1.0011            | -0.4398 | 0.0513          | 5.3883    |
| Maximum:  | 16.1000 | 9.8900           | 2.2915  | 33.1000         | 1.2000  | 0.1823         | 82.0000 | 8.9000            | 2.1861  | 0.5000          | 455.7899  |
| Std:      | 3.6887  | 1.5023           | 1.1445  | 5.2863          | 0.1800  | 1.1318         | 13.9120 | 1.5197            | 0.9043  | 0.0009          | 4280.0000 |

## TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- All Data

| Samples | Waste    | Chromium |         | Lead   |         | Nickel   |        | Selenium |         | Silver |         |
|---------|----------|----------|---------|--------|---------|----------|--------|----------|---------|--------|---------|
|         |          | Raw      | Treated | (LN)   | Raw     | Treated  | (LN)   | Raw      | Treated | (LN)   | Raw     |
| 1       | C-825    | 0.4030   | -0.9088 | v      | 0.0286  | -3.5200  | v      | 0.0150   | -4.1997 | v      | 0.0384  |
| 2       | WP-11262 | 40.6000  | 2.0400  | 0.7129 | 0.0286  | -3.5200  | 0.0442 | <        | 0.0384  | v      | -3.2597 |
| 3       | WP-10073 | 284.0000 | 1.0100  | 0.0100 | 0.0286  | -3.5200  | 0.3630 | <        | 0.0384  | v      | -3.2597 |
| 4       | C-833    | 0.1250   | -2.0794 | v      | 0.0286  | -3.5200  | 0.0150 | -4.1997  | <       | 0.0910 | v       |
| 5       | C-832    | 0.6200   | -0.4780 | v      | 0.0286  | -3.5200  | 0.0150 | -4.1997  | v       | 0.0384 | v       |
| 6       | C-828    | 0.1570   | -1.8515 | v      | 0.0286  | -3.5200  | 0.0150 | -4.1997  | v       | 0.0384 | v       |
| 7       | C-830    | 0.1710   | -1.7861 | v      | 0.0286  | -3.5200  | 0.0150 | -4.1997  | v       | 0.0384 | v       |
| 8       | WP-10076 | 317.0000 | 1.4000  | 0.3385 | 0.2960  | -3.5200  | 0.6070 | 0.0150   | -4.1997 | v      | 0.0384  |
| 9       | WP-10081 | 1580.00  | v       | 0.0028 | -5.8781 | 0.2960   | 0.0400 | 0.0150   | -4.1997 | v      | 0.0384  |
| 10      | WP-7397  | 0.0558   | 0.0939  | v      | -2.3655 | 50.7000  | 0.0286 | 0.2180   | v       | 0.0150 | v       |
| 11      | WP-6458  | v        | 0.0028  | v      | -5.8781 | 0.2880   | 0.0286 | -3.5200  | 0.0694  | v      | 0.0384  |
| 12      | WP-1731  | 0.6100   | v       | 0.0057 | -5.1873 | 13.0000  | 0.0212 | -3.8304  | <       | 0.0800 | v       |
| 13      | WP-12967 | 0.0050   | v       | 0.0050 | -5.2983 | 390.0000 | 0.0300 | -3.5086  | 0.1450  | 0.0100 | v       |
| 14      | WP-1772  | 0.0070   | v       | 0.0050 | -5.2983 | 114.0000 | 0.0300 | -3.5086  | 0.2340  | 0.0500 | v       |
| 15      | WP-10078 | 0.6390   | v       | 0.0987 | -2.3157 | 2690.00  | 0.0286 | -3.5200  | 0.0686  | v      | 0.0384  |
| 16      | WP-7124  | 0.0280   | v       | 0.0028 | -5.8781 | 900.0000 | 1.1400 | v        | 0.1500  | v      | 0.0384  |
| 17      | C-473    | v        | v       | 0.0028 | -5.8781 | 4430.00  | 0.0286 | -3.5200  | 0.1660  | v      | 0.0384  |
| 18      | WP-6795  | 0.0390   | v       | 0.0028 | -5.8781 | 77.2000  | v      | 0.0150   | -4.1997 | v      | 0.0384  |
| 19      | WP-6797  | v        | v       | 0.0028 | -5.8781 | 220.0000 | v      | 0.0150   | -4.1997 | v      | 0.0384  |
| 20      | WP-6798  | 0.0018   | v       | 0.0028 | -5.8781 | 8.6700   | 0.4400 | -0.8210  | v       | 0.0150 | v       |
| 21      | C-992    | v        | v       | 0.0340 | -3.3814 | v        | 0.0300 | -3.5086  | 0.0300  | v      | 0.0050  |
| 22      | WP-6458  | v        | v       | 0.0028 | -5.8781 | 0.2880   | v      | 0.0286   | -3.5200 | 0.0694 | v       |
| 23      | WP-7393  | 0.0058   | v       | 0.0939 | -2.3655 | 50.7000  | v      | 0.0286   | -3.5200 | 0.2180 | v       |
| 24      | WP-12651 | 0.5000   | v       | 0.0150 | -4.1997 | 0.3100   | v      | 1.0000   | v       | 0.0100 | v       |
| 25      | C-1454   | v        | v       | 0.0050 | -5.2983 | 1400.00  | 0.4690 | -0.7572  | 0.0900  | 0.0950 | v       |
| 26      | C-1448   | v        | v       | 0.0050 | -5.2983 | 1900.00  | 0.9090 | 0.0862   | 0.1010  | v      | 0.0380  |
| 27      | C-1456   | v        | v       | 0.0090 | -4.7105 | v        | v      | 0.0300   | -3.5086 | 0.1900 | -1.6607 |
| 28      | C-1458   | v        | v       | 0.0050 | -5.2983 | v        | v      | 0.0300   | -3.5086 | 0.0100 | -4.6052 |
| 29      | WP-11504 | 0.0100   | v       | 0.0050 | -5.2983 | 1280.00  | 0.6450 | -0.4385  | 1.5000  | 0.0150 | -4.1997 |
| 30      | WP-13041 | 0.0110   | v       | 0.0050 | -5.2983 | 18.8000  | 0.0377 | -3.2781  | 2.2200  | 0.0951 | -2.3228 |
| 31      | WP-14700 | v        | v       | 0.0050 | -2.2320 | -1.4610  | 0.0610 | 0.0300   | -3.5086 | 0.0760 | 0.0080  |
| 32      | WP-6766  | 0.2800   | v       | 0.0028 | -5.8781 | 338.0000 | 0.1490 | -1.9038  | v       | 1.5000 | 0.0150  |
| 33      | WP-8036  | 0.0280   | v       | 0.0028 | -5.8781 | 783.0000 | v      | 0.0286   | -3.5200 | 0.1500 | 0.0347  |
| 34      | WP-7280  | 0.2800   | v       | 0.0028 | -5.8781 | 0.6450   | v      | 0.0150   | -4.1997 | 1.3610 | 0.3840  |
| 35      | WP-6969  | 0.0922   | v       | 0.0028 | -5.8781 | 3.8000   | v      | 0.0217   | -3.8304 | 1.0000 | v       |
| 36      | WP-1672  | 0.0240   | v       | 0.0057 | -5.1673 | v        | v      | 0.0065   | -5.0360 | 0.0100 | -4.6052 |
| 37      | C-491    | v        | v       | 0.0028 | -5.8781 | v        | v      | 0.0065   | -5.0360 | 0.0150 | -4.1997 |
| 38      | C-484    | v        | v       | 0.0028 | -5.8781 | v        | v      | 0.0065   | -5.0360 | 0.0150 | -4.1997 |
| 39      | C-470    | v        | v       | 0.0227 | -3.7854 | v        | v      | 0.0100   | -4.6052 | v      | v       |
| 40      | C-480    | v        | v       | 0.0573 | -2.8595 | v        | v      | 0.0065   | -5.0360 | 0.0150 | -4.1997 |
| 41      | C-489    | v        | v       | 0.0104 | -4.5659 | v        | v      | 0.0065   | -5.0360 | 0.0150 | -4.1997 |
| 42      | C-495    | v        | v       | 0.0048 | -5.3817 | v        | v      | 0.0065   | -5.0360 | 0.0150 | -4.1997 |
| 43      | C-1002   | v        | v       | 0.0800 | -2.5257 | v        | v      | 0.0300   | -3.5086 | 0.4230 | -0.8604 |
| 44      | WP-12111 | v        | v       | 0.0050 | -5.2983 | 246.0000 | v      | 0.0300   | -3.5086 | 0.0740 | v       |
| 45      | C-896    | v        | v       | 0.0050 | -5.2983 | v        | v      | 0.0100   | -4.6052 | 0.2180 | -1.5233 |
| 46      | C-906    | v        | v       | 0.0050 | -5.2983 | 3.0800   | v      | 0.0060   | -4.8283 | 1.1249 | 0.8100  |
| 47      | C-912    | v        | v       | 0.0050 | -5.2983 | 0.5390   | v      | 0.0100   | -4.6052 | 0.6180 | 0.1010  |

## TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- All Data

| Samples   | Waste  | Raw       | Chromium<br>Treated | (LN)    | Raw       | Lead<br>Treated | (LN)     | Raw      | Nickel<br>Treated | (LN)    | Raw     | Selenium<br>Treated | (LN)    | Raw    | Treated | Silver<br>Treated<br>(LN) |        |
|-----------|--------|-----------|---------------------|---------|-----------|-----------------|----------|----------|-------------------|---------|---------|---------------------|---------|--------|---------|---------------------------|--------|
| 48        | C-918  |           | 1.6600              | 0.5068  | 0.1010    | -2.2926         |          | 0.0050   | -5.2983           |         | 0.2190  | -1.5187             |         | v      | 0.0050  | -5.2983                   |        |
| 49        | C-925  |           | < 0.0050            | -5.2983 | 0.1040    | -2.2634         |          | < 0.0050 | -5.2983           |         | 0.0520  | -2.9565             |         | v      | 0.0050  | -5.2983                   |        |
| 50        | C-935  |           | < 0.0050            | -5.2983 | 0.0950    | -2.3539         |          | 0.0110   | -4.5099           |         | <       | 0.0500              | -2.9957 |        | 0.0050  | -5.2983                   |        |
| 51        | C-1198 |           | < 0.0050            | -5.2983 | 0.0410    | -3.1942         |          | < 0.0100 | -4.6052           |         | 0.0700  | -2.6583             |         | v      | 0.0050  | -5.2983                   |        |
| 52        | C-1203 |           | 0.0050              | -5.2983 | 0.0300    | -3.5068         |          | 0.0100   | -4.6052           |         | 0.0800  | -2.5257             |         | v      | 0.0050  | -5.2983                   |        |
| 53        | C-1281 |           | 0.0050              | -5.2983 | 0.0300    | -3.5068         |          | 0.0100   | -4.6052           |         | <       | 0.0500              | -2.9957 |        | 0.0500  | -2.9957                   |        |
| 54        | C-1299 |           | 0.0050              | -5.2983 | 0.0680    | -2.6882         |          | 0.0100   | -4.6052           |         | <       | 0.0500              | -2.9957 |        | 0.0500  | -2.9957                   |        |
| 55        | C-980  |           | 0.0050              | -5.2983 | 0.0750    | 0.0720          | -0.3257  | 0.0050   | -5.2983           |         | 0.1230  | -2.0956             |         | v      | 0.0050  | -5.2983                   |        |
| 56        | R-1731 |           | 0.1730              |         | 1.3800    |                 |          | 0.1850   |                   |         | 0.0500  |                     | v       |        |         |                           |        |
| 57        | R-1731 |           | 0.2150              |         | 0.0415    |                 |          | 0.1970   |                   |         | 0.0500  |                     | v       |        |         |                           |        |
| 58        | R-1731 |           | 0.0846              |         | < 0.0150  |                 |          | 0.0150   |                   |         | 0.1320  |                     | v       |        |         |                           |        |
| 59        | R-1731 |           | 0.2800              |         | < 2.9600  |                 |          | 2.0800   |                   |         | 3.8400  |                     | v       |        |         |                           |        |
| 60        | R-1731 |           | 0.2800              |         | 2.9600    |                 |          | 1.5000   |                   |         | 3.8400  |                     | v       |        |         |                           |        |
| 61        | R-1731 |           | 0.0037              |         | 0.1640    |                 |          | 0.0150   |                   |         | 0.0384  |                     | v       |        |         |                           |        |
| 62        | R-1731 |           | 0.1730              |         | 1670.00   |                 |          | 0.2280   |                   |         | 0.0384  |                     | v       |        |         |                           |        |
| 63        | GNB-1  |           | 0.0200              | <       | 0.0200    | -3.9120         | 874.0000 | <        | 0.1000            | -2.3026 |         | 0.1100              | <       | 0.0500 | -2.9957 | 0.0100                    |        |
| 64        | GNB-2  |           | 0.7500              | <       | 5.0000    | <               | 0.1000   | -2.3026  |                   | <       | 0.0500  | -2.9957             | v       | 0.0100 | v       | 0.0100                    |        |
| 65        | GNB-3  |           | 0.2100              | <       | 0.0200    | -3.9120         | <        | 0.1000   | -2.3026           |         | <       | 0.0500              | -2.9957 | v      | 0.0100  | v                         | 0.0100 |
| 66        | GNB-4  |           | 0.0200              | <       | 282.0000  | -3.9120         |          | 0.3000   | -1.2040           |         | 0.1100  | -2.9957             | v       | 0.0100 | v       | 0.0100                    |        |
| 67        | GNB-5  |           | 0.0200              | <       | 215.0000  | 0.1000          | -2.3026  | 0.1300   | 0.0600            | -2.8134 |         | 0.0100              | v       | 0.0100 | v       | 0.0100                    |        |
| 68        | GNB-6  |           | 0.0200              | <       | 898.0000  | <               | 0.1000   | -2.3026  |                   | 0.1000  | 0.0900  | -2.4079             | v       | 0.0100 | v       | 0.0100                    |        |
| # of Obs: |        | 39        | 61                  | 39      | 61        | 33              | 55       | 55       | 39                | 61      | 61      | 39                  | 61      | 61     | 61      | 61                        |        |
| # of NDs: |        | 19        | 40                  | 61      | 7         | 41              | 61       | 11       | 41                | 55      | 30      | 32                  | 61      | 39     | 59      | 59                        |        |
| Minimum:  |        | 0.0018    | 0.0028              | -5.8781 | 0.0286    | 0.0065          | -5.0360  | 0.0150   | -5.2983           | 0.0384  | -3.2597 | 0.0046              | 0.0046  | 61     | 61      | 61                        |        |
| Mean:     |        | 57.0890   | 0.1410              | -4.2116 | 483.7651  | 0.1834          | -2.8859  | 0.7925   | 0.0310            | -4.1313 | 0.7155  | 0.0954              | -2.6965 | 0.395  | 0.0145  | -5.3817                   |        |
| Maximum:  |        | 1580.0000 | 2.0400              | 0.7129  | 4430.0000 | 3.0800          | 1.1249   | 8.8000   | 0.4230            | -0.8604 | 5.0000  | 0.8100              | -2.2107 | 5.7700 | 0.0577  | -4.7922                   |        |
| Std:      |        | 259.1531  | 0.3958              | 1.8874  | 906.8499  | 0.4467          | 1.3720   | 1.6286   | 0.0673            | 0.8851  | 1.3844  | 0.1338              | 0.6790  | 1.2007 | 0.0185  | 0.9397                    |        |

## TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- All Data

| Samples | Waste    | Raw    | Thallium Treated | (LN)    | Raw    | Vanadium Treated | (LN)    | Raw     | Zinc Treated | (LN)    | Raw      | Mercury Treated | (LN)    |         |        |        |        |
|---------|----------|--------|------------------|---------|--------|------------------|---------|---------|--------------|---------|----------|-----------------|---------|---------|--------|--------|--------|
| 1       | C-825    | <      | 0.0700           | -2.6593 | <      | 0.0041           | -5.4968 | <       | 0.0082       | -4.8036 | <        | 0.0080          | -4.8283 |         |        |        |        |
| 2       | WP-11262 | <      | 0.1100           | -2.2073 | <      | 0.1100           | -2.2073 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 3       | WP-10073 | <      | 0.1000           | -2.2073 | <      | 0.1100           | -2.2073 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 4       | C-833    | <      | 0.1000           | -2.2073 | <      | 0.1100           | -2.2073 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 5       | C-832    | <      | 0.1000           | -2.2073 | <      | 0.1100           | -2.2073 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 6       | C-828    | <      | 0.1000           | -2.2073 | <      | 0.1100           | -2.2073 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 7       | C-830    | <      | 0.1000           | -2.2073 | <      | 0.1100           | -2.2073 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 8       | WP-10076 | <      | 1.1000           | -2.2073 | <      | 0.1100           | -2.2073 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 9       | WP-10081 | <      | 1.1000           | -2.2073 | <      | 0.1100           | -2.2073 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 10      | WP-7397  | 0.0780 | 0.0780           | -2.5510 | 0.0780 | -2.5510          | -2.5510 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 11      | WP-6458  | 0.1440 | 0.0780           | -2.5510 | 0.1440 | 0.0780           | -2.5510 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 12      | WP-1731  | <      | 7.8000           | 0.8137  | <      | 0.2082           | -2.5510 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 13      | WP-12967 | 0.0700 | 0.0700           | -2.6593 | 0.0700 | 0.0050           | -2.6593 | <       | 0.0050       | -5.2983 | 44.2000  | <               | 0.0080  |         |        |        |        |
| 14      | WP-1772  | 0.0980 | 0.0500           | -2.9857 | 0.0980 | 0.0050           | -2.9857 | <       | 0.0050       | -5.2983 | 44.2000  | <               | 0.0080  |         |        |        |        |
| 15      | WP-10078 | 0.7140 | 0.1100           | -2.2073 | 0.7140 | 0.1100           | -2.2073 | <       | 0.0100       | -0.6931 | 0.5000   | <               | 0.0080  |         |        |        |        |
| 16      | WP-7124  | <      | 0.7800           | 0.0780  | <      | 0.5510           | -2.5510 | <       | 0.0100       | -4.6052 | 0.0080   | <               | 0.0080  |         |        |        |        |
| 17      | C-473    | <      | 0.0780           | -2.5510 | <      | 0.0780           | -2.5510 | <       | 0.0080       | <       | 0.0080   | <               | 0.0080  |         |        |        |        |
| 18      | WP-6795  | 0.7800 | 0.0780           | -2.5510 | 0.7800 | 0.0851           | -2.4639 | <       | 0.0100       | -0.6931 | 0.0080   | <               | 0.0080  |         |        |        |        |
| 19      | WP-6797  | 0.0780 | 0.0780           | -2.5510 | 0.0780 | 0.0851           | -2.4639 | <       | 0.0100       | -4.6052 | 0.0080   | <               | 0.0080  |         |        |        |        |
| 20      | WP-6798  | 0.0780 | 0.0780           | -2.5510 | 0.0780 | 0.0780           | -2.5510 | <       | 0.0100       | -0.6931 | 0.0080   | <               | 0.0080  |         |        |        |        |
| 21      | C-982    | <      | 0.0500           | -2.9857 | <      | 0.1440           | 0.0780  | -2.5510 | 0.0210       | -3.8632 | 0.0430   | -3.1466         | <       | 0.0080  |        |        |        |
| 22      | WP-6458  | <      | 0.0780           | -2.5510 | <      | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 3100.00  | <               | 0.0080  |         |        |        |        |
| 23      | WP-7393  | <      | 0.0780           | -2.5510 | <      | 0.0780           | -2.5510 | <       | 0.0110       | -4.5099 | 0.5000   | <               | 0.0080  |         |        |        |        |
| 24      | WP-12651 | 7.0000 | 0.0700           | -2.6593 | 7.0000 | 0.0700           | -2.6593 | <       | 0.0120       | -4.4228 | 0.5000   | <               | 0.0080  |         |        |        |        |
| 25      | C-1454   | <      | 0.0700           | -2.6593 | <      | 0.0700           | -2.6593 | <       | 0.0050       | -4.4228 | 0.5000   | <               | 0.0080  |         |        |        |        |
| 26      | C-1448   | <      | 0.0700           | -2.6593 | <      | 0.0700           | -2.6593 | <       | 0.0150       | -4.4228 | 0.5000   | <               | 0.0080  |         |        |        |        |
| 27      | C-1456   | <      | 0.0700           | -2.6593 | <      | 0.0700           | -2.6593 | <       | 0.0110       | -4.5099 | 0.5000   | <               | 0.0080  |         |        |        |        |
| 28      | C-1458   | <      | 0.0700           | -2.6593 | <      | 0.0700           | -2.6593 | <       | 0.0120       | -4.4228 | 0.5000   | <               | 0.0080  |         |        |        |        |
| 29      | WP-11504 | <      | 0.0700           | -2.6593 | <      | 0.0700           | -2.6593 | <       | 0.0050       | -4.4228 | 0.2950   | -0.6931         | <       | 0.0080  |        |        |        |
| 30      | WP-13041 | 0.0700 | 0.0700           | -2.6593 | 0.0700 | 0.0050           | -2.6593 | <       | 0.0050       | -4.4228 | 0.6030   | -0.6931         | <       | 0.0080  |        |        |        |
| 31      | WP-14700 | 0.0780 | 0.0500           | -2.9857 | 0.0780 | 0.0780           | -2.5510 | <       | 0.0310       | -3.4738 | 3.1300   | 0.0320          | -3.4420 | <       | 0.0080 |        |        |
| 32      | WP-6766  | 7.8000 | 0.2260           | -1.4872 | 7.8000 | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 1.2000   | 0.5000          | -0.6931 | <       | 0.0080 |        |        |
| 33      | WP-8036  | 0.7800 | 0.0780           | -2.5510 | 0.7800 | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 0.6030   | 0.5000          | -0.6931 | <       | 0.0080 |        |        |
| 34      | WP-7280  | 7.8000 | 0.0780           | -2.5510 | 7.8000 | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 1.2000   | 0.0320          | -3.4420 | <       | 0.0080 |        |        |
| 35      | WP-6969  | 0.0780 | 0.0780           | -2.5510 | 0.0780 | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 3.1300   | 0.0320          | -3.4420 | <       | 0.0080 |        |        |
| 36      | WP-1672  | 0.7700 | 0.0780           | -2.5510 | 0.7700 | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 170.0000 | 27.7400         | 3.3229  | <       | 0.0080 |        |        |
| 37      | C-491    | <      | 0.0780           | -2.5510 | <      | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 0.5000   | 0.0200          | 0.0200  | <       | 0.0080 |        |        |
| 38      | C-484    | <      | 0.0780           | -2.5510 | <      | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 0.5000   | 0.0200          | 0.0200  | <       | 0.0080 |        |        |
| 39      | C-470    | <      | 0.0780           | -2.5510 | <      | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 0.5000   | 0.0200          | 0.0200  | <       | 0.0080 |        |        |
| 40      | C-480    | <      | 0.0780           | -2.5510 | <      | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 0.5000   | 0.0200          | 0.0200  | <       | 0.0080 |        |        |
| 41      | C-489    | <      | 0.0780           | -2.5510 | <      | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 0.5000   | 0.0200          | 0.0200  | <       | 0.0080 |        |        |
| 42      | C-495    | <      | 0.0780           | -2.5510 | <      | 0.0780           | -2.5510 | <       | 0.0050       | -5.2983 | 0.5000   | 0.0200          | 0.0200  | <       | 0.0080 |        |        |
| 43      | C-1002   | <      | 0.0500           | -2.9857 | <      | 0.0700           | -2.6593 | <       | 0.0800       | -2.5257 | 2.2200   | <               | 0.0380  | -3.2702 | <      | 0.0110 |        |
| 44      | WP-12111 | <      | 0.0700           | -2.9857 | <      | 0.0500           | -2.9857 | <       | 0.0050       | -5.2983 | 0.1050   | 0.1050          | -2.2443 | <       | 0.0080 |        |        |
| 45      | C-896    | <      | 0.0500           | -2.9857 | <      | 0.0500           | -2.9857 | <       | 0.0050       | -5.2983 | 1.0000   | 0.0000          | 0.0000  | 0.0080  | <      | 0.0080 |        |
| 46      | C-906    | <      | 0.0500           | -2.9857 | <      | 0.0500           | -2.9857 | <       | 0.0050       | -5.2983 | 0.2870   | 0.2870          | -1.2483 | <       | 0.0080 | <      | 0.0080 |
| 47      | C-912    | <      | 0.0500           | -2.9857 | <      | 0.0500           | -2.9857 | <       | 0.0050       | -5.2983 | 0.2870   | 0.2870          | -1.2483 | <       | 0.0080 | <      | 0.0080 |

## TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- All Data

| Samples   | Waste  | Raw    | Thallium Treated   | (LN)    | Raw    | Vanadium Treated | (LN)     | Raw       | Zinc Treated | (LN)    | Raw    | Mercury Treated | (LN)    |
|-----------|--------|--------|--------------------|---------|--------|------------------|----------|-----------|--------------|---------|--------|-----------------|---------|
| 48        | C-918  |        | 0.1280             | -2.0557 |        | 0.0140           | -4.2687  | 1.1100    | 0.1044       | <       | 0.0080 | -4.8283         |         |
| 49        | C-925  |        | v 0.0500           | -2.9957 |        | 0.0080           | -4.8283  | 0.3920    | -0.9365      | <       | 0.0080 | -4.8283         |         |
| 50        | C-935  |        | v v 0.0500         | -2.9957 |        | 0.0050           | -5.2983  | 0.0420    | -3.1701      | <       | 0.0120 | -4.4228         |         |
| 51        | C-1198 |        | v v v 0.0700       | -2.6593 |        | v 0.0050         | -5.2983  | 0.3240    | -1.1270      | <       | 0.0080 | -4.8283         |         |
| 52        | C-1203 |        | v v v v 0.0700     | -2.6593 |        | v 0.0050         | -5.2983  | 0.2070    | -1.5750      | <       | 0.0080 | -4.8283         |         |
| 53        | C-1281 |        | v v v v v 0.0700   | -2.6593 |        | v 0.0050         | -5.2983  | 0.9200    | -0.9834      | <       | 0.0080 | -4.8283         |         |
| 54        | C-1299 |        | v v v v v v 0.0700 | -2.6593 |        | v 0.0050         | -5.1160  | 0.5000    | -0.6931      | <       | 0.0080 | -4.8283         |         |
| 55        | C-980  |        | v v v v v v 0.0500 | -2.9957 |        | v 0.0050         | -5.1160  | 430.0000  | 1.2000       | 0.1823  | <      | 0.0080          | -4.8283 |
| 56        | R-1731 | 4.7700 | v v v v v v 0.1100 | 7.9000  |        | v 0.0050         | 257.0000 |           |              | <       | 0.0080 |                 |         |
| 57        | R-1731 | 3.4200 | v v v v v v 0.1100 | 7.9000  |        | v 0.0050         |          |           |              | <       | 0.0080 |                 |         |
| 58        | R-1731 | 4.7700 | v v v v v v 0.1100 | 7.9000  |        | v 0.0050         |          |           |              | <       | 0.0080 |                 |         |
| 59        | R-1731 | 3.4200 | v v v v v v 0.1100 | 7.9000  |        | v 0.0050         |          |           |              | <       | 0.0080 |                 |         |
| 60        | R-1731 | 4.7700 | v v v v v v 0.1100 | 7.9000  |        | v 0.0050         |          |           |              | <       | 0.0080 |                 |         |
| 61        | R-1731 | 3.4200 | v v v v v v 0.1100 | 7.9000  |        | v 0.0050         |          |           |              | <       | 0.0080 |                 |         |
| 62        | R-1731 | 4.7700 | v v v v v v 0.1100 | 7.9000  |        | v 0.0050         |          |           |              | <       | 0.0080 |                 |         |
| 63        | GNB-1  |        |                    |         |        |                  |          |           |              | <       | 0.0080 |                 |         |
| 64        | GNB-2  |        |                    |         |        |                  |          |           |              | <       | 0.0080 |                 |         |
| 65        | GNB-3  |        |                    |         |        |                  |          |           |              | <       | 0.0080 |                 |         |
| 66        | GNB-4  |        |                    |         |        |                  |          |           |              | <       | 0.0080 |                 |         |
| 67        | GNB-5  |        |                    |         |        |                  |          |           |              | <       | 0.0080 |                 |         |
| 68        | GNB-6  |        |                    |         |        |                  |          |           |              | <       | 0.0080 |                 |         |
| # of Obs: |        | 33     | 55                 | 55      | 10     | 26               | 9        | 26        | 26           | 39      | 36     | 36              |         |
| # of NDs: |        | 24     | 51                 | 55      | 9      | 13               | 0        | 11        | 26           | 35      | 34     | 36              |         |
| Minimum:  |        | 0.0700 | 0.0500             | -2.9957 | 0.0050 | 0.0041           | -5.4968  | 0.2950    | 0.0082       | -4.8036 | 0.0020 | 0.0020          | -6.2146 |
| Mean:     |        | 2.0757 | 0.0932             | -2.5306 | 0.3055 | 0.0326           | -4.6923  | 445.3383  | 1.4624       | -1.3479 | 0.0133 | 0.0085          | -4.8157 |
| Maximum:  |        | 7.8000 | 0.8137             | -0.2062 | 3.0000 | 0.5661           | -0.5690  | 3100.0000 | 27.7400      | 3.3229  | 0.1100 | 0.0500          | 0.0000  |
| Std:      |        | 2.9855 | 0.1028             | 0.4317  | 0.9468 | 0.1099           | 1.0965   | 1006.6580 | 5.3706       | 1.7184  | 0.0227 | 0.0075          | 1.0218  |

## **ATTACHMENT 2**

## Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- Identification of Outliers

## Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- Identification of Outliers

## Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L)

- Identification of Outliers

## •• Identification of Outliers

## Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L) – Identification of Outliers

## Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L)

- Identification of Outliers

## Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L) — Identification of Outliers

## Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L)

- > Identification of Outliers

## - Identification of Outliers

## Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- Identification of Outliers

## Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- Identification of Outliers

Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L)  
→ Identification of Outliers

| Samples | Waste     | Raw    | Vanadium<br>Treated | Z-Test<br>(LN) | Outlier?<br>(Yes) | Zinc<br>Treated<br>(LN) | Z-Test  | Outlier?<br>(Yes) |
|---------|-----------|--------|---------------------|----------------|-------------------|-------------------------|---------|-------------------|
| 48      | C-918     |        |                     |                |                   |                         |         |                   |
| 49      | C-925     |        |                     |                |                   |                         |         |                   |
| 50      | C-935     |        |                     |                |                   |                         |         |                   |
| 51      | C-1198    |        |                     |                |                   |                         |         |                   |
| 52      | C-1203    |        |                     |                |                   |                         |         |                   |
| 53      | C-1281    |        |                     |                |                   |                         |         |                   |
| 54      | C-1299    |        |                     |                |                   |                         |         |                   |
| 55      | C-980     |        |                     |                |                   |                         |         |                   |
| 56      | R-1731    |        |                     |                |                   |                         |         |                   |
| 57      | R-1731    |        |                     |                |                   |                         |         |                   |
| 58      | R-1731    |        |                     |                |                   |                         |         |                   |
| 59      | R-1731    |        |                     |                |                   |                         |         |                   |
| 60      | R-1731    |        |                     |                |                   |                         |         |                   |
| 61      | R-1731    |        |                     |                |                   |                         |         |                   |
| 62      | R-1731    |        |                     |                |                   |                         |         |                   |
| 63      | GNB-1     |        |                     |                |                   |                         |         |                   |
| 64      | GNB-2     |        |                     |                |                   |                         |         |                   |
| 65      | GNB-3     |        |                     |                |                   |                         |         |                   |
| 66      | GNB-4     |        |                     |                |                   |                         |         |                   |
| 67      | GNB-5     |        |                     |                |                   |                         |         |                   |
| 68      | GNB-6     |        |                     |                |                   |                         |         |                   |
|         | # of Obs: | 1      | 1                   | 1              | 1                 | 7                       | 7       | 7                 |
|         | # of NDs: | 1      | 0                   |                |                   | 0                       | 4       |                   |
|         | Minimum:  | 3.0000 | 0.5661              |                |                   | 0.2950                  | 0.0320  |                   |
|         | Mean:     | 3.0000 | 0.5661              |                |                   | 474.350                 | 4.2621  | -0.8081           |
|         | Maximum:  | 3.0000 | 0.5661              |                |                   | 3100.00                 | 27.7400 |                   |
|         | Std:      |        |                     |                |                   | 1159.4000               | 10.3550 | 2.1557            |
|         | Coe:      |        |                     |                |                   |                         |         |                   |
|         | VF:       |        |                     |                |                   |                         |         |                   |

Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L)  
-- Identification of Outliers

| Samples | Waste    | Raw | Mercury Treated | (LN) | Z-Test | Outlier? (Yes) |
|---------|----------|-----|-----------------|------|--------|----------------|
| 1       | C-825    |     |                 |      |        |                |
| 2       | WP-11262 |     |                 |      |        |                |
| 3       | WP-10073 |     |                 |      |        |                |
| 4       | C-833    |     |                 |      |        |                |
| 5       | C-832    |     |                 |      |        |                |
| 6       | C-828    |     |                 |      |        |                |
| 7       | C-830    |     |                 |      |        |                |
| 8       | WP-10076 |     |                 |      |        |                |
| 9       | WP-10081 |     |                 |      |        |                |
| 10      | WP-7397  |     |                 |      |        |                |
| 11      | WP-6458  |     |                 |      |        |                |
| 12      | WP-1731  |     |                 |      |        |                |
| 13      | WP-12967 |     |                 |      |        |                |
| 14      | WP-1772  |     |                 |      |        |                |
| 15      | WP-10078 |     |                 |      |        |                |
| 16      | WP-7124  |     |                 |      |        |                |
| 17      | C-473    |     |                 |      |        |                |
| 18      | WP-6795  |     |                 |      |        |                |
| 19      | WP-6797  |     |                 |      |        |                |
| 20      | WP-6798  |     |                 |      |        |                |
| 21      | C-992    |     |                 |      |        |                |
| 22      | WP-6458  |     |                 |      |        |                |
| 23      | WP-7393  |     |                 |      |        |                |
| 24      | WP-12651 |     |                 |      |        |                |
| 25      | C-1454   |     |                 |      |        |                |
| 26      | C-1448   |     |                 |      |        |                |
| 27      | C-1456   |     |                 |      |        |                |
| 28      | C-1458   |     |                 |      |        |                |
| 29      | WP-11504 |     |                 |      |        |                |
| 30      | WP-13041 |     |                 |      |        |                |
| 31      | WP-14700 |     |                 |      |        |                |
| 32      | WP-6766  |     |                 |      |        |                |
| 33      | WP-8036  |     |                 |      |        |                |
| 34      | WP-7280  |     |                 |      |        |                |
| 35      | WP-6969  |     |                 |      |        |                |
| 36      | WP-1672  | <   |                 |      |        |                |
| 37      | C-491    |     |                 |      |        |                |
| 38      | C-484    |     |                 |      |        |                |
| 39      | C-470    |     |                 |      |        |                |
| 40      | C-480    |     |                 |      |        |                |
| 41      | C-489    |     |                 |      |        |                |
| 42      | C-495    |     |                 |      |        |                |
| 43      | C-1002   |     |                 |      |        |                |
| 44      | WP-12111 |     |                 |      |        |                |
| 45      | C-896    |     |                 |      |        |                |
| 46      | C-906    |     |                 |      |        |                |
| 47      | C-912    |     |                 |      |        |                |

Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L)  
 - Identification of Outliers

| Samples | Waste     | Raw    | Mercury Treated<br>(LN) | Z-Test  | Outlier?<br>(Yes) |
|---------|-----------|--------|-------------------------|---------|-------------------|
| 48      | C-918     |        |                         |         |                   |
| 49      | C-925     |        |                         |         |                   |
| 50      | C-935     |        |                         |         |                   |
| 51      | C-1198    |        |                         |         |                   |
| 52      | C-1203    |        |                         |         |                   |
| 53      | C-1281    |        |                         |         |                   |
| 54      | C-1299    |        |                         |         |                   |
| 55      | C-980     |        |                         |         |                   |
| 56      | R-1731    |        |                         |         |                   |
| 57      | R-1731    |        |                         |         |                   |
| 58      | R-1731    |        |                         |         |                   |
| 59      | R-1731    |        |                         |         |                   |
| 60      | R-1731    |        |                         |         |                   |
| 61      | R-1731    |        |                         |         |                   |
| 62      | R-1731    |        |                         |         |                   |
| 63      | GNB-1     |        |                         |         |                   |
| 64      | GNB-2     |        |                         |         |                   |
| 65      | GNB-3     |        |                         |         |                   |
| 66      | GNB-4     |        |                         |         |                   |
| 67      | GNB-5     |        |                         |         |                   |
| 68      | GNB-6     |        |                         |         |                   |
|         | # of Obs: | 2      | 2                       | 2       |                   |
|         | # of NDs: | 1      | 2                       |         |                   |
|         | Minimum:  | 0.0200 | 0.0080                  |         |                   |
|         | Mean:     | 0.0650 | 0.0290                  | -3.9120 |                   |
|         | Maximum:  | 0.1100 | 0.0500                  |         |                   |
|         | Std:      | 0.0636 | 0.0297                  | 1.2958  |                   |
|         | C99:      |        |                         |         |                   |
|         | VF:       |        |                         |         |                   |

## **ATTACHMENT 3**

Evaluation of TCLP Data Provided By Rollins Environmental and GNB ( $\text{mg/L}$ ) - Minus Incomplete Data, Points Showing No Treatment (Effluent>Influent), and Statistical Outliers

#### Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- Minus Incomplete Data, Points Showing No Treatment (Effluent>Influent), and Statistical Outliers

| Sample#   | Waste   | Antimony Treated |         | Arsenic Treated |         | Barium Treated |         | Beryllium Treated |        | Cadmium Treated |        |
|-----------|---------|------------------|---------|-----------------|---------|----------------|---------|-------------------|--------|-----------------|--------|
|           |         | Raw              | (LN)    | Raw             | (LN)    | Raw            | (LN)    | Raw               | (LN)   | Raw             | (LN)   |
| 48        | C-918   |                  |         |                 |         |                |         |                   |        |                 |        |
| 49        | C-925   |                  |         |                 |         |                |         |                   |        |                 |        |
| 50        | C-935   |                  |         |                 |         |                |         |                   |        |                 |        |
| 51        | C-1198  |                  |         |                 |         |                |         |                   |        |                 |        |
| 52        | C-1203  |                  |         |                 |         |                |         |                   |        |                 |        |
| 53        | C-1281  |                  |         |                 |         |                |         |                   |        |                 |        |
| 54        | C-1299  |                  |         |                 |         |                |         |                   |        |                 |        |
| 55        | C-980   |                  |         |                 |         |                |         |                   |        |                 |        |
| 56        | R-1731  |                  |         |                 |         |                |         |                   |        |                 |        |
| 57        | R-1731  |                  |         |                 |         |                |         |                   |        |                 |        |
| 58        | R-1731  |                  |         |                 |         |                |         |                   |        |                 |        |
| 59        | R-1731  |                  |         |                 |         |                |         |                   |        |                 |        |
| 60        | R-1731  |                  |         |                 |         |                |         |                   |        |                 |        |
| 61        | R-1731  |                  |         |                 |         |                |         |                   |        |                 |        |
| 62        | R-1731  |                  |         |                 |         |                |         |                   |        |                 |        |
| 63        | GNB-1   |                  |         |                 |         |                |         |                   |        |                 |        |
| 64        | GNB-2   |                  |         |                 |         |                |         |                   |        |                 |        |
| 65        | GNB-3   |                  |         |                 |         |                |         |                   |        |                 |        |
| 66        | GNB-4   |                  |         |                 |         |                |         |                   |        |                 |        |
| 67        | GNB-5   |                  |         |                 |         |                |         |                   |        |                 |        |
| 68        | GNB-6   |                  |         |                 |         |                |         |                   |        |                 |        |
| # of Obs: | 9       | 9                | 9       | 20              | 20      | 20             | 12      | 12                | 12     | 4               | 4      |
| # of NDs: | 1       | 2                | 5       | 18              | 0       | 0              | 2       | 2                 | 4      | 4               | 4      |
| Minimum:  | 0.2440  | 0.0300           | 0.1310  | 0.0050          | 1.4000  | 0.3650         | 0.0050  | 0.0017            | 0.0017 | 5               | 5      |
| Mean:     | 3.1588  | 0.0418           | -3.1960 | 1.1750          | 0.0239  | -4.0318        | 16.1758 | 2.5836            | 0.3647 | 0.0080          | 0.0050 |
| Maximum:  | 16.1000 | 0.0590           | 3.0400  | 0.0563          | 82.0000 | 8.9000         | 0.5000  | 0.0050            | 0.0042 | 1.5230          | 0.0050 |
| Sd:       | 5.0256  | 0.0911           | 0.2174  | 1.1382          | 0.0155  | 0.8898         | 21.8519 | 2.9826            | 1.1454 | 0.2452          | 0.0000 |
| VF:       |         |                  |         |                 |         |                |         |                   |        | 0.5394          | 0.0000 |
| TS:       |         |                  |         |                 |         |                |         |                   |        | 0.280           | 0.0000 |
|           |         |                  |         |                 |         |                |         |                   |        | 0.0112          | 0.0000 |
|           |         |                  |         |                 |         |                |         |                   |        | 0.014           | 0.0000 |

#### Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L) – Minus Incomplete Data, Points Showing No Treatment (Effluent>Influent), and Statistical Outliers

#### Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- Minus Incomplete Data, Points Showing No Treatment (Effluent>Influent), and Statistical Outliers

| Samples   | Waste  | Chromium Treated (LN) |         |         | Lead Treated (LN) |         |         | Nickel Treated (LN) |         |         | Selenium Treated (LN) |         |         | Silver Treated (LN) |         |         |
|-----------|--------|-----------------------|---------|---------|-------------------|---------|---------|---------------------|---------|---------|-----------------------|---------|---------|---------------------|---------|---------|
|           |        | Raw                   | Treated | (LN)    | Raw               | Treated | (LN)    | Raw                 | Treated | (LN)    | Raw                   | Treated | (LN)    | Raw                 | Treated | (LN)    |
| 48        | C-918  |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 49        | C-925  |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 50        | C-935  |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 51        | C-1198 |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 52        | C-1203 |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 53        | C-1281 |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 54        | C-1299 |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 55        | C-980  |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 56        | R-1731 |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 57        | R-1731 |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 58        | R-1731 |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 59        | R-1731 |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 60        | R-1731 |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 61        | R-1731 |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 62        | R-1731 |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 63        | GNB-1  |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| 64        | GNB-2  | 0.7500 <              | 0.0200  | -3.9120 | 5.0000 <          | 0.1000  | -2.3026 | 874.0000 <          | 0.1000  | -2.3026 | 0.1100 <              | 0.0500  | -2.9957 |                     |         |         |
| 65        | GNB-3  | 0.2100 <              | 0.0200  | -3.9120 | 282.0000          | 0.3000  | -1.2040 |                     |         |         | 0.1100                | 0.0500  | -2.9957 |                     |         |         |
| 66        | GNB-4  |                       |         |         | 215.0000          | 0.1000  | -2.3026 |                     |         |         | 0.1300                | 0.0600  | -2.8134 |                     |         |         |
| 67        | GNB-5  |                       |         |         | 898.0000 <        | 0.1000  | -2.3026 |                     |         |         | 0.1000                | 0.0900  | -2.4079 |                     |         |         |
| 68        | GNB-6  |                       |         |         |                   |         |         |                     |         |         |                       |         |         |                     |         |         |
| # of Obs: |        | 17                    | 17      | 27      | 27                | 27      | 22      | 22                  | 22      | 22      | 15                    | 15      | 14      | 14                  | 14      | 14      |
| # of NDs: |        | 6                     | 14      | 2       | 19                | 6       | 18      | 10                  | 9       | 9       | 14                    | 14      | 12      | 12                  | 12      | 12      |
| Minimum:  |        | 0.0070                | 0.0028  | 0.0610  | 0.0217            | 0.0442  | 0.0080  | 0.1000              | 0.0384  | 0.0384  | 0.0091                | 0.0091  | 0.0046  | 0.0046              | 0.0046  | 0.0046  |
| Mean:     |        | 109.8534              | 0.0712  | -4.8062 | 532.9296          | 0.1189  | -2.8026 | 0.9461              | 0.0232  | -4.0448 | 1.2469                | 0.0554  | -2.9615 | 0.0554              | -0.0552 | -0.0552 |
| Maximum:  |        | 1580.00               | 1.0100  | 4430.00 | 0.6450            | 8.8000  | 0.0951  | 5.00                | 0.1164  | 0.9100  | 0.9100                | 0.1466  | 0.9100  | 0.0090              | 0.0090  | 0.0090  |
| Std:      |        | 385.0248              | 0.2430  | 1.5889  | 990.3406          | 0.1654  | 1.0776  | 0.0239              | 0.6626  | 1.6893  | 0.2324                | 0.3629  | 0.2476  | 0.0114              | 0.2215  | 0.2215  |
| VF:       |        | 4.66                  | 0.33    | 6.28    | 3.53              | 1.9297  | 3.53    | 2.18                |         |         |                       |         | 0.163   | 0.163               |         |         |
| TS:       |        |                       |         |         |                   | 0.75    | 0.75    | 0.75                |         |         |                       |         | 0.082   | 0.082               | 0.082   | 0.082   |

#### Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L) - Minus Incomplete Data, Points Showing No Treatment (Effluent>Influent), and Statistical Outliers

Evaluation of TCLP Data Provided By Rollins Environmental and GNB (mg/L) – Minus Incomplete Data, Points Showing No Treatment (Effluent>Influent), and Statistical Outliers

| Samples   | Waste  | Raw    | Thallium Treated (LN) | Raw    | Vanadium Treated (LN) | Raw       | Zinc Treated (LN) | Raw     | Mercury Treated (LN) |
|-----------|--------|--------|-----------------------|--------|-----------------------|-----------|-------------------|---------|----------------------|
| 48        | C-918  |        |                       |        |                       |           |                   |         |                      |
| 49        | C-925  |        |                       |        |                       |           |                   |         |                      |
| 50        | C-935  |        |                       |        |                       |           |                   |         |                      |
| 51        | C-1198 |        |                       |        |                       |           |                   |         |                      |
| 52        | C-1203 |        |                       |        |                       |           |                   |         |                      |
| 53        | C-1281 |        |                       |        |                       |           |                   |         |                      |
| 54        | C-1299 |        |                       |        |                       |           |                   |         |                      |
| 55        | C-980  |        |                       |        |                       |           |                   |         |                      |
| 56        | R-1731 |        |                       |        |                       |           |                   |         |                      |
| 57        | R-1731 |        |                       |        |                       |           |                   |         |                      |
| 58        | R-1731 |        |                       |        |                       |           |                   |         |                      |
| 59        | R-1731 |        |                       |        |                       |           |                   |         |                      |
| 60        | R-1731 |        |                       |        |                       |           |                   |         |                      |
| 61        | R-1731 |        |                       |        |                       |           |                   |         |                      |
| 62        | R-1731 |        |                       |        |                       |           |                   |         |                      |
| 63        | GNB-1  |        |                       |        |                       |           |                   |         |                      |
| 64        | GNB-2  |        |                       |        |                       |           |                   |         |                      |
| 65        | GNB-3  |        |                       |        |                       |           |                   |         |                      |
| 66        | GNB-4  |        |                       |        |                       |           |                   |         |                      |
| 67        | GNB-5  |        |                       |        |                       |           |                   |         |                      |
| 68        | GNB-6  |        |                       |        |                       |           |                   |         |                      |
| <hr/>     |        |        |                       |        |                       |           |                   |         |                      |
| # of Obs: | 15     | 15     | 15                    | 1      | 1                     | 1         | 6                 | 6       | 2                    |
| # of NDs: | 9      | 14     | 1                     | 0      | 0                     | 0         | 4                 | 0       | 2                    |
| Minimum:  | 0.0780 | 0.0500 | 3.0000                | 0.5661 | 0.5661                | 0.2950    | 0.0320            | 0.0200  | 0.0080               |
| Mean:     | 2.0126 | 0.0921 | -2.4550               | 3.0000 | 0.5661                | 525.1742  | 0.3492            | -1.4965 | 0.0290               |
| Maximum:  | 7.80   | 0.2280 | 0.3658                | 3.0000 | 0.5661                | 3100.00   | 0.5000            | 0.1100  | 0.0500               |
| Std:      | 2.8851 | 0.0419 | 0.3658                |        |                       | 1261.5167 | 0.2339            | 1.2629  | 0.0636               |
| VF:       |        | 2.19   |                       | 2.80   | 1.59                  | 12.16     | 4.25              | 2.80    |                      |
| TS:       |        | 0.20   |                       |        |                       |           |                   |         | 0.081                |

## **ATTACHMENT 4**

**Calculation of Treatment Standards for TC Metals in Stabilized Wastes  
Performance Data from Rollins Environmental and GNB**

|  | <b>Antimony</b>                           | <b>Arsenic</b>                            | <b>Barium</b>        | <b>Beryllium</b>     | <b>Cadmium</b>                            | <b>Chromium</b>                           | <b>Lead</b>          | <b>Mercury</b>                            | <b>Nickel</b>                             | <b>Selenium</b>                           | <b>Silver</b>                             | <b>Tellurium</b>                          | <b>Vanadium</b>                           | <b>Zinc</b> |
|--|---|---|----------------------|----------------------|---|---|----------------------|---|---|---|---|---|---|-------------|
| Number of Samples                          | 9   | 20  | 12                   | 4                    | 26  | 17  | 27                   | 2   | 22  | 15  | 14  | 15  | 1   | 6           |
| Percent Recovery (PR) %                    | -   | -   | -                    | -                    | -   | -   | -                    | -   | -   | -   | -   | -   | -   | -           |
| Accuracy Correction Factor (ACF)           | 1   | 1   | 1                    | 1                    | 1   | 1   | 1                    | 1   | 1   | 1   | 1   | 1   | 1   | 1           |
| Mean of Corrected Data                     | 0.042                                     | 0.024                                     | 2.6                  | 0.0042               | 0.005                                     | 0.071                                     | 0.12                 | 0.029                                     | 0.023                                     | 0.065                                     | 0.0052                                    | 0.092                                     | 0.57                                      | 0.35        |
| Variability Factor (VF)                    | 1.63                                      | 5.9                                       | 8.04                 | 2.8                  | 2.8                                       | 4.66                                      | 6.28                 | 2.8                                       | 3.53                                      | 2.18                                      | 1.63                                      | 2.19                                      | 2.8                                       | 12.2        |
| Formula for Calculating Treatment Standard | $\text{EXP}(\gamma + 2.33^{\circ}\gamma)$ | $\text{EXP}(\gamma + 2.33^{\circ}\gamma)$ | $\text{Value}^{2.8}$ | $\text{Value}^{2.8}$ | $\text{EXP}(\gamma + 2.33^{\circ}\gamma)$ | $\text{EXP}(\gamma + 2.33^{\circ}\gamma)$ | $\text{Value}^{2.8}$ | $\text{EXP}(\gamma + 2.33^{\circ}\gamma)$ |             |
| Treatment Standard (TS) (mg/L)             | 0.068                                     | 0.14                                      | 21                   | 0.012                | 0.014                                     | 0.33                                      | 0.75                 | 0.001                                     | 0.081                                     | 0.12                                      | 0.0085                                    | 0.20                                      | 1.6                                       | 4.3         |

## **ATTACHMENT 5**

**Comparison of Treatment Standards  
Calculated for Stabilized Waste Vs. HTMR Residues (mg/L)**

| Constituents     | TS - Stabilization | TS - HTMR | New TS <u>1/</u> |
|------------------|--------------------|-----------|------------------|
| <b>Antimony</b>  | 0.068              | 0.043     | 0.07 <u>2/</u>   |
| <b>Arsenic</b>   | 0.14               | 0.026     | NC               |
| <b>Barium</b>    | 21                 | 3.3       | 21               |
| <b>Beryllium</b> | 0.012              | 0.018     | 0.02 <u>2/</u>   |
| <b>Cadmium</b>   | 0.014              | 0.20      | 0.20             |
| <b>Chromium</b>  | 0.33               | 0.85      | 0.85             |
| <b>Lead</b>      | 0.75               | 0.12      | 0.75             |
| <b>Mercury</b>   | 0.081              | --        | NC               |
| <b>Nickel</b>    | 0.081              | 13.6      | 13.6             |
| <b>Selenium</b>  | 0.12               | 0.29      | NC               |
| <b>Silver</b>    | 0.0085             | 0.11      | 0.11             |
| <b>Thallium</b>  | 0.20               | --        | 0.20             |
| <b>Vanadium</b>  | 1.6                | 0.015     | 1.6              |
| <b>Zinc</b>      | 4.3                | 3.8       | 4.3              |

**1/** The new treatment standard was established by selecting the higher of the two treatment standards calculated for stabilized wastes and HTMR residues.

**2/** The new treatment standard was rounded up.

**NC** A final treatment standard already exists for this constituent.

## **ATTACHMENT 6**

**Calculations****SUBJECT:**

Calculation of Treatment Standard for Cr.

Job Number \_\_\_\_\_  
 File Number \_\_\_\_\_  
 Sheet 1 Of 4  
 By \_\_\_\_\_ Date \_\_\_\_\_  
 App \_\_\_\_\_ Date \_\_\_\_\_

**I. Data Reduction**

Rollins Environmental and GNB provided a total of 61 samples of stabilized waste that had been analyzed for TCLP concentrations of chromium. Of the 61 samples, 42 were removed because:

- (1) the [Influent] was not provided, or
- (2) [Influent]  $\geq$  [Effluent].

The attached spreadsheet lists all of the treatment data provided by Rollins Environmental and GNB for Chromium.

**II. Outlier Analysis**

The 19 remaining data points were evaluated using the Z-score test to determine whether each individual data point was significantly different from the data set. Because the outlier test assumes that the data are normally distributed, it was necessary to transform the data by computing the logarithm of each data point before performing the outlier test. The Z-score is calculated by dividing the difference between the data point and the average of the data set by the standard deviation. For data that are normally distributed, 99.5% (or 2 standard deviations) of the measurements will have Z-scores between -2.0 and +2.0. A data point outside of this range is not considered to be representative of the population from which the data are drawn.

The Z-score calculations are presented below in Table 1. The standard deviation of the logtransformed data was calculated using the following, general equation:

$$\sigma = \sqrt{\frac{\sum_{i=1}^N (x_i - \bar{x})^2}{N-1}}$$



## Calculations

SUBJECT:

Job Number \_\_\_\_\_  
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TABLE-1 (mg/L)

| <u>[Eff]</u>                        | <u>Ln [Eff]</u> | <u><math>X_i - \bar{X}</math></u> | <u><math>(X_i - \bar{X})^2</math></u> | <u>Z-score<br/><math>(X_i - \bar{X})/\sigma</math></u> | Outlier<br>Yes/No |
|-------------------------------------|-----------------|-----------------------------------|---------------------------------------|--|-------------------|
| 2.04                                | 0.713           | 4.95                              | 24.5                                  | 2.2  | Yes               |
| 1.01                                | 0.010           | 4.25                              | 18.1                                  | 1.84   | No                |
| 1.4                                 | 0.336           | 4.58                              | 21                                    | 2.03   | Yes               |
| <0.0028                             | -5.88           | -1.64                             | 2.69                                  | -0.73  | No                |
| <0.0057                             | -5.17           | -0.93                             | 0.86                                  | -0.41  | No                |
| <0.005                              | -5.3            | -1.06                             | 1.12                                  | -0.47  | No                |
| 0.0187                              | -2.31           | 1.93                              | 3.72                                  | 0.34   | No                |
| <0.0028                             | -5.88           | -1.64                             | 2.69                                  | -0.73  | No                |
| <0.0028                             | -5.88           | -1.64                             | 2.69                                  | -0.73  | No                |
| 0.015                               | -4.2            | 0.04                              | 0.016                                 | 0.018  | No                |
| <0.005                              | -5.3            | -1.06                             | 1.12                                  | -0.47  | No                |
| <0.005                              | -5.3            | -1.06                             | 1.12                                  | -0.47  | No                |
| <0.0028                             | -5.88           | -1.64                             | 2.69                                  | -0.73  | No                |
| <0.0028                             | -5.88           | -1.64                             | 2.69                                  | -0.73  | No                |
| <0.0028                             | -5.88           | -1.64                             | 2.69                                  | -0.73  | No                |
| <0.0028                             | -5.88           | -1.64                             | 2.69                                  | -0.73  | No                |
| <0.0057                             | -5.17           | -0.93                             | 0.865                                 | -0.41  | No                |
| <0.02                               | -3.91           | -0.33                             | 0.109                                 | 0.15   | No                |
| <0.02                               | -3.91           | 0.33                              | 0.109                                 | 0.15   | No                |
| <u><math>\Sigma = -80.67</math></u> |                 | <u><math>\Sigma = 91.5</math></u> |                                       |  |                   |
| $\bar{X} = -4.24$                   |                 |                                   |                                       |  |                   |

$$\sigma = \sqrt{\frac{91.5}{19-1}} = \sqrt{5.08} = \underline{\underline{2.25}}$$

**Calculations****SUBJECT:**

Job Number \_\_\_\_\_  
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Based on the results of the z-score test, 2 additional values were removed from the data set.

III. Calculation of Variability Factor (VF)

The standard deviation of the log transformed data was recalculated using the final data set of 17 points.

| [EFF]              | LN [EFF]            | $\bar{x}_i - \bar{x}$ | $(\bar{x}_i - \bar{x})^2$ |
|--------------------|---------------------|-----------------------|---------------------------|
| 1.01               | 0.01                | 4.81                  | 23.1                      |
| <0.0028            | -5.88               | -1.08                 | 1.17                      |
| <0.0057            | -5.17               | -0.37                 | 0.137                     |
| <0.005             | -5.3                | -0.5                  | 0.25                      |
| 0.0287             | -2.31               | 2.49                  | 6.2                       |
| <0.0028            | -5.18               | -1.08                 | 1.17                      |
| <0.0028            | -5.88               | -1.08                 | 1.17                      |
| 0.015              | -4.2                | 0.6                   | 0.36                      |
| <0.005             | -5.3                | -0.5                  | 0.25                      |
| <0.005             | -5.3                | -0.5                  | 0.25                      |
| <0.0028            | -5.88               | -1.08                 | 1.17                      |
| <0.0028            | -5.88               | -1.08                 | 1.17                      |
| <0.0028            | -5.88               | -1.08                 | 1.17                      |
| <0.0028            | -5.88               | -1.08                 | 1.17                      |
| <0.0057            | -5.17               | -0.37                 | 0.137                     |
| <0.02              | -3.91               | 0.89                  | 0.792                     |
| <0.02              | -3.91               | 0.89                  | 0.792                     |
| $\Sigma = 1.21$    | $\Sigma = -81.72$   |                       | $\Sigma = 40.46$          |
| $\bar{x} = 0.0712$ | $\bar{x}_i = -4.81$ |                       |                           |

$$\theta = \sqrt{\frac{40.46}{17-1}} = \sqrt{2.5} = \underline{\underline{1.5}}$$



## Calculations

SUBJECT:

Job Number \_\_\_\_\_  
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The VF was then calculated using Eq. 1 from page D-1 of App. D of the 1991 Background Document:

$$VF_{99} = \frac{C_{99}}{\text{mean}} = \frac{Exp(y + 2.33\sigma)}{\text{mean}}$$

$$VF = \frac{Exp(-4.81 + 2.33 + 1.59)}{0.071} = \frac{Exp(-1.1053)}{0.071} = \frac{0.331}{0.071}$$

$$VF = 4.66$$

### III. Accuracy Correction Factor (ACF)

Matrix spike recovery data were not provided. ACF = 1.

### IV. Calculation of Treatment Standard (T.S.)

The treatment standard is calculated as follows:

$$T.S. = [\text{ave}] \times VF \times ACF$$

$$T.S. = 0.071 \times 4.66 \times 1$$

$$TS = 0.33 \text{ mg/L}$$

## TCLP Data Provided By Rollins Environmental and GNB (mg/L) -- Raw Data for Chromium

| Samples | Waste    |          | Chromium<br>Treated | (LN)    |
|---------|----------|----------|---------------------|---------|
|         |          | Raw      |                     |         |
| 1       | C-825    |          | 0.4030              | -0.9088 |
| 2       | WP-11262 | 40.6000  | 2.0400              | 0.7129  |
| 3       | WP-10073 | 284.0000 | 1.0100              | 0.0100  |
| 4       | C-833    |          | 0.1250              | -2.0794 |
| 5       | C-832    |          | 0.6200              | -0.4780 |
| 6       | C-828    |          | 0.1570              | -1.8515 |
| 7       | C-830    |          | 0.1710              | -1.7661 |
| 8       | WP-10076 | 317.0000 | 1.4000              | 0.3365  |
| 9       | WP-10081 | 1580.00  | < 0.0028            | -5.8781 |
| 10      | WP-7397  | 0.0056   | 0.0939              | -2.3655 |
| 11      | WP-6458  | < 0.0028 | < 0.0028            | -5.8781 |
| 12      | WP-1731  | < 0.6100 | < 0.0057            | -5.1673 |
| 13      | WP-12967 | < 0.0050 | < 0.0050            | -5.2983 |
| 14      | WP-1772  | 0.0070   | < 0.0050            | -5.2983 |
| 15      | WP-10078 | 0.6390   | 0.0987              | -2.3157 |
| 16      | WP-7124  | < 0.0280 | < 0.0028            | -5.8781 |
| 17      | C-473    |          | < 0.0028            | -5.8781 |
| 18      | WP-6795  | 0.0390   | < 0.0028            | -5.8781 |
| 19      | WP-6797  | < 0.0028 | < 0.0028            | -5.8781 |
| 20      | WP-6798  | < 0.0018 | < 0.0028            | -5.8781 |
| 21      | C-992    |          | 0.0340              | -3.3814 |
| 22      | WP-6458  | < 0.0028 | < 0.0028            | -5.8781 |
| 23      | WP-7393  | 0.0056   | 0.0939              | -2.3655 |
| 24      | WP-12651 | < 0.5000 | 0.0150              | -4.1997 |
| 25      | C-1454   |          | < 0.0050            | -5.2983 |
| 26      | C-1448   |          | < 0.0050            | -5.2983 |
| 27      | C-1456   |          | 0.0090              | -4.7105 |
| 28      | C-1458   |          | < 0.0050            | -5.2983 |
| 29      | WP-11504 | 0.0100   | < 0.0050            | -5.2983 |
| 30      | WP-13041 | 0.0110   | < 0.0050            | -5.2983 |
| 31      | WP-14700 | < 0.0050 | 0.2320              | -1.4610 |
| 32      | WP-6766  | < 0.2800 | < 0.0028            | -5.8781 |
| 33      | WP-8036  | < 0.0280 | < 0.0028            | -5.8781 |
| 34      | WP-7280  | < 0.2800 | < 0.0028            | -5.8781 |
| 35      | WP-6969  | 0.0922   | < 0.0028            | -5.8781 |
| 36      | WP-1672  | 0.0240   | < 0.0057            | -5.1673 |
| 37      | C-491    |          | < 0.0028            | -5.8781 |
| 38      | C-484    |          | < 0.0028            | -5.8781 |
| 39      | C-470    |          | 0.0227              | -3.7854 |
| 40      | C-480    |          | 0.0573              | -2.8595 |
| 41      | C-489    |          | 0.0104              | -4.5659 |
| 42      | C-495    |          | 0.0046              | -5.3817 |
| 43      | C-1002   |          | 0.0800              | -2.5257 |
| 44      | WP-12111 | < 0.0050 | < 0.0050            | -5.2983 |
| 45      | C-896    |          | < 0.0050            | -5.2983 |
| 46      | C-906    |          | < 0.0050            | -5.2983 |
| 47      | C-912    |          | < 0.0050            | -5.2983 |
| 48      | C-918    |          | 1.6600              | 0.5068  |
| 49      | C-925    |          | < 0.0050            | -5.2983 |
| 50      | C-935    |          | < 0.0050            | -5.2983 |
| 51      | C-1198   |          | < 0.0050            | -5.2983 |
| 52      | C-1203   |          | < 0.0050            | -5.2983 |
| 53      | C-1281   |          | < 0.0050            | -5.2983 |
| 54      | C-1299   |          | < 0.0050            | -5.2983 |
| 55      | C-980    |          | < 0.0050            | -5.2983 |
| 56      | R-1731   | 0.1730   |                     |         |
| 57      | R-1731   | 0.2150   |                     |         |
| 58      | R-1731   | 0.0846   |                     |         |
| 59      | R-1731   | < 0.2800 |                     |         |
| 60      | R-1731   | < 0.2800 |                     |         |
| 61      | R-1731   | 0.0037   |                     |         |
| 62      | R-1731   | 0.1730   |                     |         |
| 63      | GNB-1    | < 0.0200 | < 0.0200            | -3.9120 |
| 64      | GNB-2    | 0.7500   | < 0.0200            | -3.9120 |
| 65      | GNB-3    | 0.2100   | < 0.0200            | -3.9120 |
| 66      | GNB-4    | < 0.0200 | < 0.0200            | -3.9120 |
| 67      | GNB-5    | < 0.0200 | < 0.0200            | -3.9120 |
| 68      | GNB-6    | < 0.0200 | < 0.0200            | -3.9120 |

