

① 1997

01-02

Alamance County

01021997



November 7, 1997

Ms. Sherri Coghill
Environmental Engineer
Solid Waste Section
State of North Carolina DEHNR Division of Waste Management

RE: Ash Sampling Protocol
BFI Medical Waste Systems
Permit No. 01-02-I



Dear Ms. Coghill,

Thank you for your response to our request to review and revise our ash sampling protocol.

Please find below the information you requested.

1.) Four months of ash generated averaged each 24 hours was 8.85 tons daily which equals to 1.07 20 yd. Containers daily.

2.) I am enclosing a revised plan to show the addition of the required analysis for both pH and free liquids in section F of the proposed plan and we will add a section G to the proposed plan to show the following.

3.) Section G.

A.) Should ash be generated that is tested to be hazardous, the 20 yd. Which was held on sight while waiting for the analysis will then be properly disposed of at a permitted hazardous waste facility.

B.) To ensure that the exceedance is not a permanent problem, we will test the next (14) fourteen 20 yd. Containers for the parameter of the exceedance. All containers testing non-hazardous will be disposed of at a permanent Sub Title D Landfill.

If I can be of further assistance or you need additional information please contact me at (910) 578-8900.

Sincerely,

A handwritten signature in black ink that reads "J.W. Hill".

J.W. Hill
MESH

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Waste Management



James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

July 17, 1997

Mr. Tom Hrubesh
District Vice President
BFI Medical Waste Systems
P. O. Box 310
Haw River, North Carolina 27258

Re: Ash Sampling Protocol
BFI Medical Waste Systems
Permit No. 01-02-I
Alamance County

Dear Mr. Hrubesh:

The Solid Waste Section has completed an initial review of the revised ash sampling protocol submitted by BFI on February 24, 1997. Based on this review, the Section requests the following information.

1. Provide figure for amount of ash generated daily and frequency of generation of 20 yard containers of combustion ash.
2. The Section requires analysis for both pH and free liquids. Add these required analyses to Section F. of proposed plan.
3. Provide a plans for a characterization period following an analysis that indicates hazardous waste has been generated which ensures that ash that exceeds hazardous waste limits is not disposed in a Subtitle D facility and that an increased analysis frequency for a specified duration indicates that the exceedance is not a permanent problem.

If you have any questions or comments, please contact me at (919) 733-0692, ext. 259.

Sincerely,

Sherri Coghill
Environmental Engineer
Solid Waste Section

cc: Julian Foscue
Hugh Jernigan





3

June 27, 1997

Mr. Hugh W. Jernigan
Waste Management Specialist
N.C. Department of Environment, Health and Natural Resources
Solid Waste Section
585 Waughtown St.
Winston Salem, N.C. 27107

Dear Mr. Jernigan,

Thank you for the time you extended to me last week concerning the merger of all BFI companies.

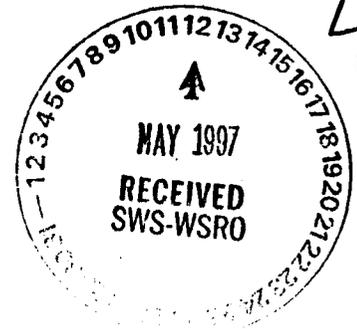
As discussed, our permit No. 01-02-I was issued to Browning-Ferris Industries (BFI) Medical Waste Systems (Southeast), Inc. on December 31, 1991. Beginning September 30, 1997, we request that our permit be issued to BFI Waste Systems of North America, Inc. This merger is the result of BFI's internal efforts to consolidate its North American subsidiaries.

If I can be of any assistance, please contact me at: (910) 578-8900.

Sincerely,

A handwritten signature in cursive script that reads "J.W. Hill".

J.W. Hill
MESH



May 7, 1997

Mr. Hugh W. Jernigan
Solid Waste Section
N.C. Dept. of Environmental Health and Natural Resources
585 Waughton St.
Winston Salem, N.C. 27107-2241

RE: Ash Sampling Protocol

Dear Mr. Jernigan,

My letter is in reference to the ash sampling protocol which we presently sample by at our medical waste incineration facility in Haw River, N.C.

Our recent experience with the lab results showing us over the E.P.A. limit on lead brings us to believe that we should be sampling our ash using the protocol which was patterned after recommended E.P.A. sampling procedures. (Please refer to our letter of February 24, 1997.)

After the lab results showed us over the limit, we sampled fourteen straight containers testing each for lead content with the fourteenth testing for TCLP. All results were within E.P.A. limits.

We are due to sample our ash again the third week of June 1997 and are anxious to know if our request by letter of February 24, 1997 has been approved or if we should continue to sample as prescribed by permit.

Thank you for your time and consideration of this matter. If you have any questions, please feel free to contact me at: 1-800-234-4785 or Larry Holloway at: (770)640-2316.

Sincerely,

A handwritten signature in black ink that reads "J.W. Hill".

J.W. Hill
MESH

State of North Carolina
Department of Environment,
Health and Natural Resources
Winston-Salem Regional Office

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary



JF
FAC
ALUMANCE LO
01-02-I
Concep.
5

**DIVISION OF WASTE MANAGEMENT
SOLID WASTE SECTION**

March 14, 1997

MEMO

TO: File

FROM: Hugh Jernigan *Hugh/mrw*

SUBJECT: BFI Medical Waste Incinerator
Ash Analysis

Received a phone call from J. W. Hill of BFI on February 18, 1997, concerning the semiannual incinerator ash composite sample analysis, which is required by Permit No. 01-02I.

Upon review of the analysis, Mr. Hill discovered that the results for lead was 28.1 mg/L and greatly in excess of the allowable concentration of 5.0 for landfilling. There were no other exceedances on the analysis.

Mr. Hill was informed he should immediately cease any shipments of ash to the BFI Speedway Landfill. Mr. Hill was also to take composite samples of the 20 yd. ash containers on site for TCLP analysis for lead. The results were to be received by BFI on February 20, 1997, and at that time discussions were to be held concerning actions required at BFI.

Met with Mr. Hill and Mr. Hrubesh of BFI on February 20, 1997. The analysis for the previous samples, one each composited from the 20 yd. containers were in totals of lead and not TCLP. Upon discussions with BFI legal representatives, BFI Landfill, and the Solid Waste Section, it was agreed that the 20 yd. roll-offs of ash would be allowed to be disposed at the landfill if the Composite Sample/TCLP analysis for each roll-off for lead meets criteria for disposal. The facility is generating approximately one 20 yd. roll-off of ash. The TCLP for lead is to be conducted for an indeterminate duration of time to generate a data base concerning lead. During the visit, ash sample procedures were reviewed and potentials for contamination of the received medial waste were discussed.

Discussions were held with Hazardous Waste concerning the exceedance on the semiannual analysis and the Hazardous Waste Section deferred the situation to Solid Waste.



March 4, 1997

Mr. Hugh W. Jernigan
Solid Waste Section
N.C. Dept. of Health and Natural Resources
585 Waughton St.
Winston Salem, N.C. 27107-2241

Dear Mr. Jernigan,

Per our phone conversation February 28, 1997 and per your request I am supplying approximate times for the fill of each 20 yd. ash can that we accumulated and had tested for the parameter lead. We had fourteen 20 yd. cans tested with the fourteenth can TCLP tested for the eight RCRA metals. I am listing them by can sample number date and time frame of the fill of each can.

If we can be of assistance please contact Tom Hrubesh or myself at (910) 578-8900.

Sincerely,

A handwritten signature in cursive script that reads "J.W. Hill".

J.W. Hill
MESH

**20 yd. can &
sample number**

**Accumulation
Date**

<i>B000001</i>	<i>Between noon 2/14/97 and noon 2/15/97</i>
<i>B0033A2</i>	<i>Between noon 2/15/97 and noon 2/16/97</i>
<i>B0233A-3</i>	<i>Between noon 2/16/97 and noon 2/17/97</i>
<i>340-4</i>	<i>Between noon 2/17/97 and noon 2/18/97</i>
<i>B000005-5</i>	<i>Between noon 2/18/97 and noon 2/19/97</i>
<i>268-6</i>	<i>Between noon 2/19/97 and noon 2/20/97</i>
<i>220-7</i>	<i>Between noon 2/20/97 and noon 2/21/97</i>
<i>B26-8</i>	<i>Between noon 2/21/97 and noon 2/22/97</i>
<i>320-9</i>	<i>Between noon 2/22/97 and noon 2/23/97</i>
<i>B0233A-3-2</i>	<i>Between noon 2/23/97 and noon 2/24/97</i>
<i>B0033A-2-2</i>	<i>Between noon 2/24/97 and noon 2/25/97</i>
<i>B000001-2</i>	<i>Between noon 2/25/97 and noon 2/26/97</i>

B000005-5-2

*Between noon 2/26/97
and noon 2/27/97*

340-4-2

*Between noon 2/27/97
and noon 2/28/97*



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
 Chemical Product Environmental Assessments • NPDES Testing
 Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
 REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B361-001
 RECEIVED: 02/19/97
 REPORTED: 02/20/97

SAMPLE DESC: B00000#1
 SAMPLE TYPE: COMPOSITE
 COLLECTED: 02/19/97 11:30 to 02/19/97 11:30

PO NUMBER: 0288

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
Lead, Total by ICP - Ash EPA 200.7	Started 02/19/97 12:30 Analyzed 02/20/97 by RTW	2	42 mg/Kg
TCLP Lead-ICP SW846-6010	Started 02/21/97 13:00 Analyzed 02/22/97 by RTW	0.05	0.54 mg/L

MQL = Minimum Quantitation Limit



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Tasting
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B361-002
RECEIVED: 02/19/97
REPORTED: 02/20/97

SAMPLE DESC: B0033A#2
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/19/97 11:30 to 02/19/97 11:30

PO NUMBER: 0288

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
Lead, Total by ICP - Ash EPA 200.7	Started 02/19/97 12:30 Analyzed 02/20/97 by RTW	2	48 mg/Kg
TCLP Lead-ICP SW846-6010	Started 02/21/97 13:00 Analyzed 02/22/97 by RTW	0.05	0.72 mg/L

MQL = Minimum Quantitation Limit



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
 Chemical Product Environmental Assessments • NPOES Testing
 Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B442-001
RECEIVED: 02/21/97
REPORTED: 02/23/97

SAMPLE DESC: FEB. MONITORING, B0233A-3 ASH
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/21/97 08:45 to 02/21/97 09:00

PO NUMBER: 0288

SITE: Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/22/97 10:10 Analyzed 02/22/97 by RTW	0.05	0.43 mg/L

MQL = Minimum Quantitation Limit



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B442-003
RECEIVED: 02/21/97
REPORTED: 02/23/97

SAMPLE DESC: FEB. MONITORING, 340-4 ASH

SAMPLE TYPE: COMPOSITE

PO NUMBER:

COLLECTED: 02/21/97 09:30 to 02/21/97 09:45 SITE: Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/22/97 10:10 Analyzed 02/22/97 by RTW	0.05	0.30 mg/L

MQL = Minimum Quantitation Limit



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
 Chemical Product Environmental Assessments • NPDES Testing
 Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
 REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B442-002
 RECEIVED: 02/21/97
 REPORTED: 02/23/97

SAMPLE DESC: FEB. MONITORING, B000005-5 ASH
 SAMPLE TYPE: COMPOSITE

PO NUMBER:

COLLECTED: 02/21/97 09:00 to 02/21/97 09:15 SITE: Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/22/97 10:10 Analyzed 02/22/97 by RTW	0.05	0.13 mg/L

MQL = Minimum Quantitation Limit



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
 Chemical Product Environmental Assessments • NPDES Testing
 Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
 REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B483-001
 RECEIVED: 02/22/97
 REPORTED: 02/24/97

SAMPLE DESC: 268-6 ASH
 SAMPLE TYPE: COMPOSITE
 COLLECTED: 02/22/97 10:00 to 02/22/97 10:15
 PO NUMBER: 0288
 SITE: Haw River

PARAMETER	DATE/TIME/ANALYST	ML	RESULT
TCLP Lead-ICP SW846-6010	Started 02/23/97 09:55 Analyzed 02/23/97 by RTW	0.05	0.25 mg/L

ML = Minimum Quantitation Limit

RECEIVED
 N.C. Dept. of EHNR
 FEB 24 1997
 Winston-Salem
 Regional Office

Post-It™ brand fax transmittal memo 7671 # of pages 1

To: Hugh W. Jernigan	From: J.W. Hill
Co: NCDEHNR	Co: BFI
Dept: Solid Waste Section	Phone #: 910-578-8900
Fax #: 910-771-4631	Fax #: 910-578-8903



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

RECEIVED
N.C. Dept. of EHNR

FEB 27 1997

Winston-Salem
Regional Office

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B484-001
RECEIVED: 02/23/97
REPORTED: 02/25/97

SAMPLE DESC: 220-7 ASH
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/23/97 13:15 to 02/23/97 13:45
SITE: Haw River
PO NUMBER:

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/24/97 11:00 Analyzed 02/24/97 by RTW	0.05	0.55 mg/L

MQL = Minimum Quantitation Limit

Post-It™ brand fax transmittal memo 7671 # of pages ▶ 4

To: Hugh W. Jernigan	From: J.W. Hill
Co: NCDEHNR	Co: BFI
Dept: Solid Waste Section	Phone #: 710-578-8900
Fax #: 910-771-4631	Fax #: 910-578-8903



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
 Chemical Product Environmental Assessments • NPDES Testing
 Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B484-002
RECEIVED: 02/23/97
REPORTED: 02/25/97

SAMPLE DESC: B26-8 ASH
SAMPLE TYPE: COMPOSITE **PO NUMBER:**
COLLECTED: 02/27/97 14:00 to 02/27/97 14:15 **SITE:** Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/24/97 11:00 Analyzed 02/24/97 by RTW	0.05	0.77 mg/L

MQL = Minimum Quantitation Limit



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
 Chemical Product Environmental Assessments • NPDES Testing
 Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B485-001
RECEIVED: 02/24/97
REPORTED: 02/26/97

SAMPLE DESC: 320-9 ASH
SAMPLE TYPE: COMPOSITE **PO NUMBER:** 0288
COLLECTED: 02/24/97 13:45 to 02/24/97 14:00 **SITE:** Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/25/97 13:00 Analyzed 02/25/97 by RTW	0.05	0.69 mg/L

MQL = Minimum Quantitation Limit



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B496-001
RECEIVED: 02/25/97
REPORTED: 02/27/97

SAMPLE DESC: BO233A-3-2
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/25/97 09:30 to 02/25/97 10:00

PO NUMBER:

SITE: Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/26/97 11:00 Analyzed 02/26/97 by RTW	0.05	0.68 mg/L

MQL = Minimum Quantitation Limit



**BURLINGTON
RESEARCH**

Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: TB547-001
RECEIVED: 02/26/97
REPORTED: 02/28/97

SAMPLE DESC: B0033A-2-2
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/26/97 11:00 to 02/26/97 11:15
PO NUMBER: 0288
SITE: Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/27/97 14:30 Analyzed 02/28/97 by RTW	0.05	0.51 mg/L

MQL = Minimum Quantitation Limit

MAR 01 '97 10:25AM BURLINGTON RESEARCH

**BURLINGTON
RESEARCH**Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORTCUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. HillWORK ORDER #: 7B581-001
RECEIVED: 02/27/97
REPORTED: 03/01/97SAMPLE DESC: B00000#1-2
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/27/97 09:00 to 02/27/97 09:30
SITE: Haw River
PO NUMBER: 0288

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/28/97 15:00 Analyzed 02/28/97 by RTW	0.05	0.54 mg/L

MQL = Minimum Quantitation Limit



**BURLINGTON
RESEARCH**

Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B581-002
RECEIVED: 02/27/97
REPORTED: 03/01/97

SAMPLE DESC: B000005#-5-2

SAMPLE TYPE: COMPOSITE

PO NUMBER: 0288

COLLECTED: 02/27/97 09:35 to 02/27/97 10:00 **SITE:** Haw River

PARAMETER	DATE/TIME/ANALYST	ML	RESULT
TCLP Lead-ICP SW846-6010	Started 02/28/97 15:00 Analyzed 02/28/97 by RTW	0.05	0.53 mg/L

ML = Minimum Quantitation Limit



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B604-001
RECEIVED: 02/28/97
REPORTED: 03/04/97

SAMPLE DESC: 340-4-2

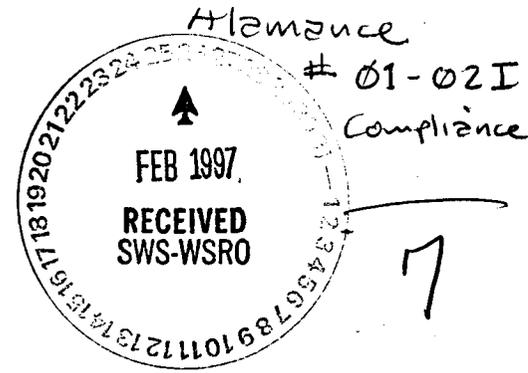
SAMPLE TYPE: COMPOSITE

PO NUMBER: 0288

COLLECTED: 02/28/97 08:30 to 02/28/97 09:00 SITE: Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Arsenic SW846-7060	Started 03/03/97 09:30 Analyzed 03/03/97 by RTW	0.005	<0.005 mg/L
TCLP Barium-ICP SW846-6010	Started 03/03/97 09:30 Analyzed 03/03/97 by RTW	0.005	66 mg/L
TCLP Cadmium-ICP SW846-6010	Started 03/03/97 09:30 Analyzed 03/03/97 by RTW	0.01	<0.01 mg/L
TCLP Chromium-ICP SW846-6010	Started 03/03/97 09:30 Analyzed 03/03/97 by RTW	0.05	0.06 mg/L
TCLP Lead-ICP SW846-6010	Started 03/03/97 09:30 Analyzed 03/03/97 by RTW	0.05	1.9 mg/L
TCLP Mercury SW846-7471A	Started 03/03/97 10:30 Analyzed 03/03/97 by SJH	0.0002	<0.0002 mg/L
TCLP SE by GF SW846 7740	Started 03/03/97 09:30 Analyzed 03/03/97 by RTW	0.005	<0.005 mg/L
TCLP Silver-ICP SW846-6010	Started 03/03/97 09:30 Analyzed 03/03/97 by RTW	0.01	<0.01 mg/L

MQL = Minimum Quantitation Limit



February 24, 1997

Mr. Hugh W. Jernigan
Solid Waste Section
N.C. Dept. of Environmental Health and Natural Resources
585 Waughton St.
Winston Salem, N.C. 27107-2241

Dear Mr. Jernigan,

I have enclosed the results of our required December 1996 ash sampling. As previously discussed on February 18, 1997, we noted the EPA parameter for lead was exceeded according to the laboratory report.

Upon your visit to our site on February 20, 1997, the determination was made that we would initiate composite sampling of each 20 yd. container for TCLP lead and have results that do not exceed EPA limits before hauling each container to Charlotte Motor Speedway Landfill until further notice from NCDEHNR Solid Waste Section. We have contacted the landfill and sent them copies of the test results for their records.

I am including in this package the results of our first six 20 yd. containers that have tested less than the EPA limits of 5.0 for lead.

We are waiting for the Solid Waste Section decision on the duration and frequency of testing.

Under separate cover we are submitting a request to modify our existing ash testing protocol.

Sincerely,

J.W. Hill
MESH

TRITEST, INC.
 3909 Beryl Road
 Raleigh, NC 27607
 Telephone: (919) 834-4984
 Fax: (919) 834-6497
 NC/WW Cert.#: 067

L a b o r a t o r y R e p o r t

--- Prepared for ---

Page 1 of 3

Mr J.W. Hill
 B.F.I.
 1168 Porter Ave.
 Haw River, NC 27258

Report Date: 1/24/97
 Date Received: 1/02/97

Work Order #: 9701-02019

Cust. Code: BF8900
 Cust. P.O.#:

Project ID: 01
 Project Info: INCINERATOR ASH COMPOSITE

No.	Sample ID	Date Sampled	Time Sampled	Matrix	Condition
1	12-1-28-96	12/26/97	10:00	MISC	AMBIENT

Test Performed	Method	Results	Tech	Date Analyzed	Qual
Metals TCLP Package; Solids	EPA 1311		TCW	1/13/97	
TCLP Arsenic Analysis		<0.1 mg/L	TCW	1/13/97	
TCLP Barium Analysis		20.8 mg/L	TCW	1/13/97	
TCLP Cadmium Analysis		0.025 mg/L	TCW	1/13/97	
TCLP Chromium Analysis		0.161 mg/L	TCW	1/13/97	
TCLP Lead Analysis		28.1 mg/L	TCW	1/13/97	
TCLP Selenium Analysis		<0.1 mg/L	TCW	1/13/97	
TCLP Silver Analysis		<0.01 mg/L	TCW	1/13/97	
TCLP Mercury Analysis		<0.0002 mg/L	TCW	1/13/97	
Metals/SVOA TCLP Extraction	EPA 1311	DONE	CLP	1/06/97	
Metals Digest. of TCLP Ext.		DONE	CLP	1/06/97	
Mercury Prep of TCLP Extr.		DONE	CLP	1/13/97	
TCLP 8270; Solids	EPA 8270B		SRB	1/08/97	
1,4-Dichlorobenzene	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
2,4-Dinitrotoluene	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
Hexachlorobenzene	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
Hexachlorobutadiene	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
Hexachloroethane	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
2-Methylphenol	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
3- & 4-Methylphenol	EPA 8270B	<0.100 mg/L	SRB	1/08/97	
Nitrobenzene	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
Pentachlorophenol	EPA 8270B	<0.250 mg/L	SRB	1/08/97	
Pyridine	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
2,4,5-Trichlorophenol	EPA 8270B	<0.100 mg/L	SRB	1/08/97	
2,4,6-Trichlorophenol	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
TCLP Volatiles; Soilds	EPA 8260A		ZW	1/10/97	
Benzene	EPA 8260A	<5 ug/L	ZW	1/10/97	

---- Continued on Next Page ----

Laboratory Report

B.F.I.

Report Date

1/24/97

Project No. 01

Work Order No.

9701-02019

No. Sample ID
1 12-1-28-96

Test Performed	Method	Results	Tech	Date Analyzed	Qual
Carbon tetrachloride	EPA 8260A	<5 ug/L	ZW	1/10/97	
Chlorobenzene	EPA 8260A	<5 ug/L	ZW	1/10/97	
Chloroform	EPA 8260A	<5 ug/L	ZW	1/10/97	
1,2-Dichloroethane	EPA 8260A	<5 ug/L	ZW	1/10/97	
1,1-Dichloroethene	EPA 8260A	<5 ug/L	ZW	1/10/97	
Methyl ethyl ketone (MEK)	EPA 8260A	<50 ug/L	ZW	1/10/97	
Tetrachloroethene	EPA 8260A	<5 ug/L	ZW	1/10/97	
Trichloroethene	EPA 8260A	<5 ug/L	ZW	1/10/97	
Vinyl chloride	EPA 8260A	<10 ug/L	ZW	1/10/97	
Arsenic by GFAA/Soil	EPA 7060	5590 ug/kg	TCW	1/13/97	
Barium by ICP/Soil	EPA 6010A	7016 mg/kg	TCW	1/13/97	
Cadmium by ICP/Soil	EPA 6010A	5.48 mg/kg	TCW	1/13/97	
Chromium by ICP/Soil	EPA 6010A	140 mg/kg	TCW	1/13/97	
Copper by ICP/Soil	EPA 6010A	1210 mg/kg	TCW	1/13/97	
Lead by GFAA/Soil	EPA 7421	15,700 mg/kg	TCW	1/13/97	
Manganese by ICP/Soil	EPA 6010A	149 mg/kg	TCW	1/13/97	
Mercury Analysis/Soil	EPA 7471A	70.8 ug/kg	CLP	1/13/97	
Nickel by ICP/Soil	EPA 6010A	126 mg/kg	TCW	1/13/97	
Selenium by GFAA/Soil	EPA 7740	<164 ug/kg	TCW	1/13/97	
Silver by ICP/Soil	EPA 6010A	7.11 mg/kg	TCW	1/13/97	
Zinc by ICP/Soil	EPA 6010A	1820 mg/kg	TCW	1/13/97	
pH/Soils	EPA 9045	8.46 S.U.	CD	1/03/97	
Paint Filter Test	EPA 9095	negative	CD	1/03/97	
Extraction, 8270 TCLP	EPA 3510	done	SRB	1/06/97	
Extr., ZHE, TCLP Volatiles	EPA 1311	DONE	CLP	1/08/97	
Metals WTG 406 Prep	EPA 3050	DONE	CLP	1/13/97	
Mercury Prep	EPA 7470A/	done	CLP	1/13/97	
Total Solids/Soils & Sludge	EPA 160.3	61 %	DJ	1/24/97	

---- Continued on Next Page ----

L a b o r a t o r y R e p o r t

B.F.I.

Report Date

1/24/97

Project No. 01

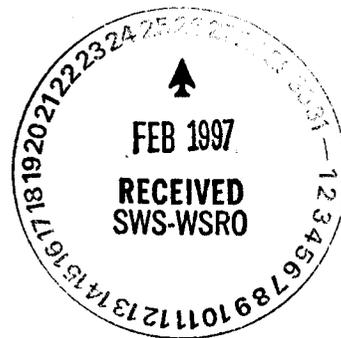
Work Order No.

9701-02019

Report certified by:

Michael Whithead

for Tritest, Inc.



8

February 24, 1997

Mr. Hugh W. Jernigan
Solid Waste Section
N.C. Dept. of Environmental Health and Natural Resources
585 Waughton St.
Winston Salem, N.C. 27107-2241

RE: Ash Sampling Protocol

Dear Mr. Jernigan,

This is to request that the attached sampling protocol be approved for implementation at our Haw River facility. This protocol was patterned after recommended EPA sampling procedures. We feel that this protocol is representative of our operations and allows us to better control the management of the ash-post sampling.

The procedure requires collecting a representative composite sample of the 20 yard container being tested. The container is divided into 8 sections and a sample is pulled from each section. The eight samples are then mixed and a single sample is pulled for analysis at an approved lab. This sampling technique is representative of the ash over a 24 hour day.

The container tested is then held on site until the sample is analyzed and results submitted to the District. This way, should a question arise, the container can be resampled or managed according to the analysis. BFI has adopted this protocol for use at all Medical Waste Facilities in the US and desires to use it at this facility.

We appreciate your consideration of this request. If you have any questions, please feel free to contact me at (910) 578-8900 or Larry Holloway at (770) 640-2316.

Sincerely,

Tom Hrubesh
District Vice President

*Pl
free liquids
how long to fill a 20 yd³ container*

ASH SAMPLING AND ANALYSIS PLAN

A. Introduction:

The purpose of this document is to provide a standard protocol for the sampling and analysis of incinerator ash at the BFI Medical Waste Haw River facility. The sampling protocol contained within will provide an easy and effective method for obtaining a representative composite sample of incinerator ash. Since all the ash from the incinerator is collected in a twenty yard roll-off container, the sample will be taken from a full container before it leaves the facility.

B. Scope:

The collection of a composite sample representative of the entire load will be accomplished by sectioning off the roll-off container into eight equal grids, and, utilizing a thief sampler, removing a core sample from each grid. Cores from each grid will be representative of the respective grid from top to bottom. All eight core samples will be combined to form the final composite sample, representative of the entire load.

The composite sample will be properly labeled and containerized, and with accompanying chain of custody and sample analysis request, forwarded to an analytical laboratory for analysis.

C. Equipment:

(1) Sampling thief- a five foot (5) long, two (2) to two and one half (2 1/2) inch diameter pvc tube.

(2) Mixing bucket- a five (5) gallon plastic pail with lid.

(3) Personal protective equipment- rubber gloves, safety glasses/shields, disposable coveralls, and respirators as needed.

(4) Sufficient sample containers to collect and transport the samples to the analytical laboratory.

D. Preparation:

Prior to sampling, the roll-off container will be divided into a grid of eight equal sections. for example, a typical roll-off container with the inside dimensions of 19 1/2 feet by 7 feet will be divided into 8 equal sections 58 1/2 inches by 42 inches as shown in figure 1- this section.

To prevent contamination of the sample, all equipment used to collect the sample, such as the sampling thief and equipment will be washed with hot tap water and detergent, rinsed with copious amounts of hot tap water, and then rinsed with a deionized water. The equipment will be allowed to air dry, and stored in clean kraft paper and stored in an area to avoid contamination with dirt or dust. All sample containers are to be provided by the laboratory contracted to do the analysis, and shall be pre-cleaned.

E. Sampling:

A TCLP sample for toxic metals will be taken quarterly using the following process.

(1) Notify the analytical laboratory of the scheduled sampling date to allow a reasonable length of time for the receipt of the sample containers at the facility.

(2) Divide the full roll-off container into its eight equal grid sections as specified above.

(3) Use the sampling thief and collect a core sample from each grid section.

(4) Remove the sample from the thief and place it into the pre-cleaned mixing bucket.

(5) Proceed as above and collect one sample from each of the remaining sections.

(6) After all the core samples are collected and deposited into the mixing bucket, thoroughly mix the sample to composite the subsamples into a final homogeneous composite sample.

(7) Once mixing is complete, fill the sample containers and label as follows:

- (a) Name of sampler*
- (b) Name of facility*
- (c) Name of sample point*
- (d) Date/time of sampling*
- (e) Preservative (if any)*
- (f) Constituents to be analyzed*

(8) After the sample has been collected, prepare it for shipment to the laboratory as described in the instructions provided by the laboratory. Complete copies of the attached chain of custody and sample analysis request forms and submit with the samples.

(9) Upon receipt of the results, carefully review the results noting any abnormalities. File the results and maintain for a period of 3 years.

F. Analysis:

The sample will be analyzed for Toxicity Characteristics Metals in accordance with the attached referenced methodologies:

REFERENCED METHODOLOGIES

PREPARATION / METHOD NAME SECTION / METHOD NUMBER
(REFERENCE)

Sample Preparation:

Toxicity Characteristic Leaching Procedure.....(2)
Microwave Acid Digestion of Aqueous Samples and
Extracts for Total Metals Analysis by AAS or ICP.....3015(1)

Metals:

Mercury, manual cold vapor technique.....7470(1)
Arsenic, barium, cadmium (ICP).....6010(1)
Chromium, lead, selenium, silver (ICP).....6010(1)

REFERENCES:

- 1) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, November, 1986, Third Edition, USEPA, SW-846 and additions thereto.
- 2) "Method 1311 - Toxicity Characteristic Leaching Procedure(TCLP)", 40 CFR Part 261, Appendix II.

: sap-ash

TOP VIEW

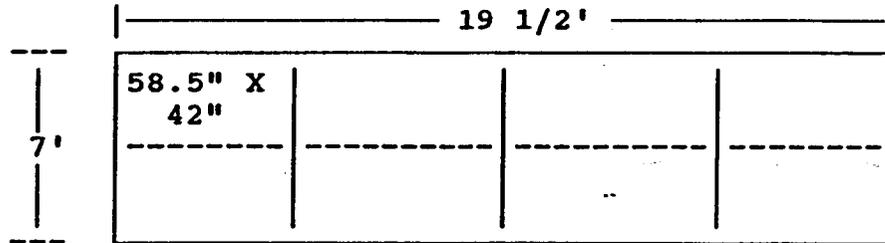


Figure 1. Typical Twenty (20) Yard Roll-off Container

CHAIN-OF-CUSTODY

Shuttle Number: _____ Seal No. _____ Prepared/Sealed By: _____
 (print name)

Laboratory: _____ (signature) _____ (date)

SHIP TO Company: _____ Attn: _____
 Address: _____ Phone: _____

SAMPLE IDENTIFICATION

Facility/Site: _____

SHUTTLE CONTENTS:

LAB I.D.	Site Source I.D.	Sample I.D.	# of Bottles	Size	P* G*	Preservative	Parameter(s)

Container type: P* = Plastic, G* = Glass

(1) Shuttle opened by: _____ (print name)	Date	Time	Seal Intact No. _____	Yes	No	_____ (signature)
(2) Shuttle prepared for shipment by: _____ (print name)	Date	Time	New Seal Installed No. _____	Yes	No	_____ (signature)
(3) Shuttle received at Lab by: _____ (print name)	Date	Time	Seal Intact No. _____	Yes	No	Lab's Name: _____ _____ (signature)
SSK Temp. rec'd: _____ deg. C						

cc-sar.doc

Fill in all applicable areas on both the paperwork and bottle labels. Make sure little or no headspace in the bottles exists. Cool samples to approx. 4 deg. C (in wet ice) and replace wet ice with frozen ice packs prior to shipment. Ship overnight air to contracted laboratory. Call in advance to notify laboratory when to expect shipment.

SAMPLE ANALYSIS REQUEST

BFI Sample No(s): _____

Date Sampled: _____ No. of Samples _____

Assigned Laboratory: _____

Laboratory Contact: _____

Location: _____

Phone: _____

Analyses Requested: _____

Sample Description: _____ Shuttle No: _____

Liquid _____ Sludge/ Solid _____ Oil _____ Other _____ See attached Chain of Custody for details on sample volumes, containers, preservatives, sampling dates.

Safety Precautions: _____ Normal Laboratory Hygiene _____ Avoid skin/eye contact
_____ Avoid breathing vapors/dust _____ Other _____

Special Handling/Storage: _____ Refrig. @ 4 degrees C.

Receiving Laboratory's Comments: (Headspace, etc.) _____

Sample submitted by: _____

Sample received by: _____

SSK temperature rec'd _____ deg. C

Name _____ Title _____

Name _____ Title _____

Company _____ Date/Time _____

Company _____ Date/Time _____

Contract Lab Nos. or Project IDs : _____

SEND REPORT TO:

SEND INVOICES TO:

CC: _____

P.O. # _____

**20 yd. can &
sample number**

**Accumulation
Date**

B000001	Between noon 2/14/97 and noon 2/15/97
B0033A2	Between noon 2/15/97 and noon 2/16/97
B0233A-3	Between noon 2/16/97 and noon 2/17/97
340-4	Between noon 2/17/97 and noon 2/18/97
B000005-5	Between noon 2/18/97 and noon 2/19/97
268-6	Between noon 2/19/97 and noon 2/20/97
220-7	Between noon 2/20/97 and noon 2/21/97
B26-8	Between noon 2/21/97 and noon 2/22/97
320-9	Between noon 2/22/97 and noon 2/23/97
B0233A-3-2	Between noon 2/23/97 and noon 2/24/97
B0033A-2-2	Between noon 2/24/97 and noon 2/25/97
B000001-2	Between noon 2/25/97 and noon 2/26/97

B000005-5-2

*Between noon 2/26/97
and noon 2/27/97*

340-4-2

*Between noon 2/27/97
and noon 2/28/97*

9



**BURLINGTON
RESEARCH**

Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B361-001
RECEIVED: 02/19/97
REPORTED: 02/20/97

SAMPLE DESC: B00000#1
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/19/97 11:30 to 02/19/97 11:30

PO NUMBER: 0288

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
Lead, Total by ICP - Ash EPA 200.7	Started 02/19/97 12:30 Analyzed 02/20/97 by RTW	2	42 mg/Kg
TCLP Lead-ICP SW846-6010	Started 02/21/97 13:00 Analyzed 02/22/97 by RTW	0.05	0.54 mg/L

MQL = Minimum Quantitation Limit



**BURLINGTON
RESEARCH**

Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B361-002
RECEIVED: 02/19/97
REPORTED: 02/20/97

SAMPLE DESC: B0033A#2
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/19/97 11:30 to 02/19/97 11:30

PO NUMBER: 0288

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
Lead, Total by ICP - Ash EPA 200.7	Started 02/19/97 12:30 Analyzed 02/20/97 by RTW	2	48 mg/Kg
TCLP Lead-ICP SW846-6010	Started 02/21/97 13:00 Analyzed 02/22/97 by RTW	0.05	0.72 mg/L

MQL = Minimum Quantitation Limit



**BURLINGTON
RESEARCH**

Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4681 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B442-001
RECEIVED: 02/21/97
REPORTED: 02/23/97

SAMPLE DESC: FEB. MONITORING, B0233A-3 ASH
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/21/97 08:45 to 02/21/97 09:00

PO NUMBER: 0288

SITE: Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/22/97 10:10 Analyzed 02/22/97 by RTW	0.05	0.43 mg/L

MQL = Minimum Quantitation Limit



**BURLINGTON
RESEARCH**

Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B442-003
RECEIVED: 02/21/97
REPORTED: 02/23/97

SAMPLE DESC: FEB. MONITORING, 340-4 ASH

SAMPLE TYPE: COMPOSITE

PO NUMBER:

COLLECTED: 02/21/97 09:30 to 02/21/97 09:45 **SITE:** Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/22/97 10:10 Analyzed 02/22/97 by RTW	0.05	0.30 mg/L

MQL = Minimum Quantitation Limit



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
 Chemical Product Environmental Assessments • NPDES Testing
 Reporting & Data Handling Services

**BURLINGTON
 RESEARCH**

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B442-002
RECEIVED: 02/21/97
REPORTED: 02/23/97

SAMPLE DESC: FEB. MONITORING, B000005-5 ASH

SAMPLE TYPE: COMPOSITE

PO NUMBER:

COLLECTED: 02/21/97 09:00 to 02/21/97 09:15 **SITE:** Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/22/97 10:10 Analyzed 02/22/97 by RTW	0.05	0.13 mg/L

MQL = Minimum Quantitation Limit



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPOES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: **BROWNING FERRIS INDUSTRIES**
REPORT TO: **Mr. J.W. Hill**

WORK ORDER #: **7B483-001**
RECEIVED: **02/22/97**
REPORTED: **02/24/97**

SAMPLE DESC: **268-6 ASH**
SAMPLE TYPE: **COMPOSITE**
COLLECTED: **02/22/97 10:00 to 02/22/97 10:15** SITE: **Haw River**
PO NUMBER: **0288**

PARAMETER	DATE/TIME/ANALYST	ML	RESULT
TCLP Lead-ICP SW846-6010	Started 02/23/97 09:55 Analyzed 02/23/97 by RTW	0.05	0.25 mg/L

ML = Minimum Quantitation Limit

RECEIVED
N.C. Dept. of EHNR
FEB 24 1997
Winston-Salem
Regional Office

Post-It™ brand fax transmittal memo 7671 # of pages > 1

To <i>Hugh W. Jernigan</i>	From <i>J.W. Hill</i>
Co. <i>NCDEHNR</i>	Co. <i>BFI</i>
Dept. <i>Solid Waste Section</i>	Phone # <i>910-578-8900</i>
Fax # <i>910-771-4631</i>	Fax # <i>910-578-8903</i>



**BURLINGTON
RESEARCH**

Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

**RECEIVED
N.C. Dept. of EHNR**

FEB 27 1997

**Winston-Salem
Regional Office**

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B484-001
RECEIVED: 02/23/97
REPORTED: 02/25/97

SAMPLE DESC: 220-7 ASH
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/23/97 13:15 to 02/23/97 13:45
PO NUMBER:
SITE: Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/24/97 11:00 Analyzed 02/24/97 by RTW	0.05	0.55 mg/L

MQL = Minimum Quantitation Limit

Post-It™ brand fax transmittal memo 7671 # of pages **4**

To <i>Hugh W. Jernigan</i>	From <i>J.W. Hill</i>
Co. <i>NCDEHNR</i>	Co. <i>BFI</i>
Dept. <i>Solid Waste Section</i>	Phone # <i>710-578-8900</i>
Fax # <i>910-771-4631</i>	Fax # <i>910-578-8903</i>



**BURLINGTON
RESEARCH**

Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B484-002
RECEIVED: 02/23/97
REPORTED: 02/25/97

SAMPLE DESC: B26-8 ASH
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/27/97 14:00 to 02/27/97 14:15 **SITE:** Haw River
PO NUMBER:

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/24/97 11:00 Analyzed 02/24/97 by RTW	0.05	0.77 mg/L

MQL = Minimum Quantitation Limit



**BURLINGTON
RESEARCH**

Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORT

CUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7B485-001
RECEIVED: 02/24/97
REPORTED: 02/26/97

SAMPLE DESC: 320-9 ASH

SAMPLE TYPE: COMPOSITE

PO NUMBER: 0288

COLLECTED: 02/24/97 13:45 to 02/24/97 14:00 **SITE:** Haw River

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/25/97 13:00 Analyzed 02/25/97 by RTW	0.05	0.69 mg/L

MQL = Minimum Quantitation Limit

**BURLINGTON
RESEARCH**Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations
Chemical Product Environmental Assessments • NPDES Testing
Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • (910) 570-4661 • Fax (910) 570-4698

ANALYTICAL REPORTCUSTOMER: BROWNING FERRIS INDUSTRIES
REPORT TO: Mr. J.W. HillWORK ORDER #: 7B496-001
RECEIVED: 02/25/97
REPORTED: 02/27/97SAMPLE DESC: BO233A-3-2
SAMPLE TYPE: COMPOSITE
COLLECTED: 02/25/97 09:30 to 02/25/97 10:00
SITE: Haw River
PO NUMBER:

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
TCLP Lead-ICP SW846-6010	Started 02/26/97 11:00 Analyzed 02/26/97 by RTW	0.05	0.68 mg/L

MQL = Minimum Quantitation Limit



10

February 24, 1997

Mr. Hugh W. Jernigan
Solid Waste Section
N.C. Dept. of Environmental Health and Natural Resources
585 Waughton St.
Winston Salem, N.C. 27107-2241

Dear Mr. Jernigan,

I have enclosed the results of our required December 1996 ash sampling. As previously discussed on February 18, 1997, we noted the EPA parameter for lead was exceeded according to the laboratory report.

Upon your visit to our site on February 20, 1997, the determination was made that we would initiate composite sampling of each 20 yd. container for TCLP lead and have results that do not exceed EPA limits before hauling each container to Charlotte Motor Speedway Landfill until further notice from NCDEHNR Solid Waste Section. We have contacted the landfill and sent them copies of the test results for their records.

I am including in this package the results of our first six 20 yd. containers that have tested less than the EPA limits of 5.0 for lead.

We are waiting for the Solid Waste Section decision on the duration and frequency of testing.

Under separate cover we are submitting a request to modify our existing ash testing protocol.

Sincerely,

A handwritten signature in black ink that reads "J.W. Hill". The signature is written in a cursive style.

J.W. Hill
MESH

TRITEST, INC.
 3909 Beryl Road
 Raleigh, NC 27607
 Telephone: (919) 834-4984
 Fax: (919) 834-6497
 NC/WW Cert.#: 067

L a b o r a t o r y R e p o r t

--- Prepared for ---

Page 1 of 3

Mr J.W. Hill
 B.F.I.
 1168 Porter Ave.
 Haw River, NC 27258

Report Date: 1/24/97
 Date Received: 1/02/97

Work Order #: 9701-02019

Cust. Code: BF8900
 Cust. P.O.#:

Project ID: 01
 Project Info: INCINERATOR ASH COMPOSITE

No.	Sample ID	Date Sampled	Time Sampled	Matrix	Condition
1	12-1-28-96	12/26/97	10:00	MISC	AMBIENT

Test Performed	Method	Results	Tech	Date Analyzed	Qual
Metals TCLP Package; Solids	EPA 1311		TCW	1/13/97	
TCLP Arsenic Analysis		<0.1 mg/L	TCW	1/13/97	
TCLP Barium Analysis		20.8 mg/L	TCW	1/13/97	
TCLP Cadmium Analysis		0.025 mg/L	TCW	1/13/97	
TCLP Chromium Analysis		0.161 mg/L	TCW	1/13/97	
TCLP Lead Analysis		28.1 mg/L	TCW	1/13/97	
TCLP Selenium Analysis		<0.1 mg/L	TCW	1/13/97	
TCLP Silver Analysis		<0.01 mg/L	TCW	1/13/97	
TCLP Mercury Analysis		<0.0002 mg/L	TCW	1/13/97	
Metals/SVOA TCLP Extraction	EPA 1311		DONE CLP	1/06/97	
Metals Digest. of TCLP Ext.			DONE CLP	1/06/97	
Mercury Prep of TCLP Extr.			DONE CLP	1/13/97	
TCLP 8270; Solids	EPA 8270B		SRB	1/08/97	
1,4-Dichlorobenzene	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
2,4-Dinitrotoluene	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
Hexachlorobenzene	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
Hexachlorobutadiene	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
Hexachloroethane	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
2-Methylphenol	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
3- & 4-Methylphenol	EPA 8270B	<0.100 mg/L	SRB	1/08/97	
Nitrobenzene	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
Pentachlorophenol	EPA 8270B	<0.250 mg/L	SRB	1/08/97	
Pyridine	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
2,4,5-Trichlorophenol	EPA 8270B	<0.100 mg/L	SRB	1/08/97	
2,4,6-Trichlorophenol	EPA 8270B	<0.050 mg/L	SRB	1/08/97	
TCLP Volatiles; Soilds	EPA 8260A		ZW	1/10/97	
Benzene	EPA 8260A	<5 ug/L	ZW	1/10/97	

---- Continued on Next Page ----

Laboratory Report

B.F.I.

Report Date

1/24/97

Project No. 01

Work Order No.

9701-02019

No. Sample ID
1 12-1-28-96

Test Performed	Method	Results	Tech	Date Analyzed	Qual
Carbon tetrachloride	EPA 8260A	<5 ug/L	ZW	1/10/97	
Chlorobenzene	EPA 8260A	<5 ug/L	ZW	1/10/97	
Chloroform	EPA 8260A	<5 ug/L	ZW	1/10/97	
1,2-Dichloroethane	EPA 8260A	<5 ug/L	ZW	1/10/97	
1,1-Dichloroethene	EPA 8260A	<5 ug/L	ZW	1/10/97	
Methyl ethyl ketone (MEK)	EPA 8260A	<50 ug/L	ZW	1/10/97	
Tetrachloroethene	EPA 8260A	<5 ug/L	ZW	1/10/97	
Trichloroethene	EPA 8260A	<5 ug/L	ZW	1/10/97	
Vinyl chloride	EPA 8260A	<10 ug/L	ZW	1/10/97	
Arsenic by GFAA/Soil	EPA 7060	5590 ug/kg	TCW	1/13/97	
Barium by ICP/Soil	EPA 6010A	7016 mg/kg	TCW	1/13/97	
Cadmium by ICP/Soil	EPA 6010A	5.48 mg/kg	TCW	1/13/97	
Chromium by ICP/Soil	EPA 6010A	140 mg/kg	TCW	1/13/97	
Copper by ICP/Soil	EPA 6010A	1210 mg/kg	TCW	1/13/97	
Lead by GFAA/Soil	EPA 7421	15,700 mg/kg	TCW	1/13/97	
Manganese by ICP/Soil	EPA 6010A	149 mg/kg	TCW	1/13/97	
Mercury Analysis/Soil	EPA 7471A	70.8 ug/kg	CLP	1/13/97	
Nickel by ICP/Soil	EPA 6010A	126 mg/kg	TCW	1/13/97	
Selenium by GFAA/Soil	EPA 7740	<164 ug/kg	TCW	1/13/97	
Silver by ICP/Soil	EPA 6010A	7.11 mg/kg	TCW	1/13/97	
Zinc by ICP/Soil	EPA 6010A	1820 mg/kg	TCW	1/13/97	
pH/Soils	EPA 9045	8.46 S.U.	CD	1/03/97	
Paint Filter Test	EPA 9095	negative	CD	1/03/97	
Extraction, 8270 TCLP	EPA 3510	done	SRB	1/06/97	
Extr., ZHE, TCLP Volatiles	EPA 1311	DONE	CLP	1/08/97	
Metals WTG 406 Prep	EPA 3050	DONE	CLP	1/13/97	
Mercury Prep	EPA 7470A/	done	CLP	1/13/97	
Total Solids/Soils & Sludge	EPA 160.3	61 %	DJ	1/24/97	

---- Continued on Next Page ----

L a b o r a t o r y R e p o r t

B.F.I.

Report Date

1/24/97

Project No. 01

Work Order No.

9701-02019

Report certified by:

Michael Whithead

for Tritest, Inc.

Scan Info.

11

MEMO



TO: Sherri Coghill

DATE: BFT

SUBJECT: Medical Waste

Note:
We need to respond on the request
for sampling protocol (Paragraph 4).

Thanks.
[Signature]

From: _____



North Carolina Department of Environment,
Health, and Natural Resources



Printed on Recycled Paper