Environmental Consultants

RECEIVED

June 4, 2010

JUN 1 1 2010 BUREAU OF AIR REGULATION

Ms. Trina Vielhauer, Bureau Chief Bureau of Air Regulation Department of Environmental Protection STATE OF FLORIDA 2600 Blair Stone Road, MS 5505 Tallahassee, FL 32399-2400

Subject: Seminole Energy, LLC

DEP File No. 1170084-008-AC (PSD-FL-376A) LFG Monitoring Sulfur and Chlorine Contents

Dear Ms. Vielhauer:

Condition 3.C. of Section III – Emission Unit(s) Specific Conditions of Air Construction Permit 1170084-008-AC (PSD-FL-376A) issued Seminole Energy, LLC (Seminole Energy) specifies that The permittee shall comply with the following requirements to monitor the sulfur and chlorine content of the landfill gas:

... the permittee shall sample and analyze the landfill gas for sulfur and chlorine content. The gas sample collected for the analyses shall be a composite sample and collected under normal operating conditions ... The gas sample collection and analyses for sulfur and chlorine content shall be done semi-annually ... Results shall be reported as SO_2 and HCl emission factors in terms of lb/MMscf of landfill gas.

The initial gas sample collection and analyses were completed in February 2007. Therefore, Derenzo and Associates, Inc. (Derenzo and Associates), on behalf of Seminole Energy, is submitting to the Florida Department of Environmental Protection, Division of Air Resource Management (FDEP-DARM) results of sulfur and chlorine analyses that were performed on a sample of landfill gas (LFG) obtained from the Osceola Road Solid Waste Management Facility in April 2010 (semi-annual collection and analyses). The required SO₂ and HCl emission factors (in terms of lb/MMscf of landfill gas) and supporting analytical data are provided in the attached documents.

The air permit application for Seminole Energy developed (based on USEPA AP-42 default LFG composition data) a:

- 1. SO₂ emission factor of 27.5 lb/MMscf of LFG; and
- 2. HCl emission factor of 11.95 lb/MMscf of LFG.

Derenzo and Associates, Inc.

Ms. Trina Vielhauer FDEP-DARM

Page 2 June 4, 2010

The SO₂ emission factor developed from analyses of the April 28, 2010 sample of LFG obtained from the Osceola Road Solid Waste Management Facility is 19.79 lb/MMscf of LFG (<19.87 lb/MMscf of LFG with the incorporation of all non-measured chemicals at its reporting limit).

The HCl emission factor developed from analyses of the April 28, 2010 sample of LFG obtained from the Osceola Road Solid Waste Management Facility is 0.43 lb/MMscf of LFG (<2.23 lb/MMscf of LFG with the incorporation of all non-measured chemicals at its reporting limit).

Please contact us if you have questions or require clarifications

Sincerely,

DERENZO AND ASSOCIATES, INC.

Charles Scamp

Environmental consultant

attachments

c: Mike Laframboise, Landfill Energy Systems
Gary Kuberski, FDEP Central District Office
Kimberly Russell, Seminole County Solid Waste Management Division

Seminole Energy, LLC (April 28, 2010 Sample)

Sulfur Dioxide Emission Factor for LFG Combustion

	Analytical Report		No.	Sulfur Content ^B	Resulting SO ₂
LFG Influent Sulfur Compound	Concentrations ^A (ppmv)	Molecular Formula	Sulfur Atoms	as H ₂ S (ppmv)	Emission Rate (lb./MMcf)
Hydrogen sulfide	96.5	H ₂ S	1	96.5	16.04 *
Carbonyl sulfide	0.28	CSO	1	0.28	0.05
Methyl mercaptan	8.15	CH ₄ S	1	8.15	1.36
Ethyl mercaptan	0.06	C₂H ₆ S	1	0.06	0.01
Dimethyl sulfide	13.5	C_2H_6S	1	13.5	2.24
Carbon disulfide	0.04	CS ₂	2	0.08	0.01
Isopropyl mercaptan	0.13	C_3H_6S	1	0.13	0.02
tert-Butyl mercaptan	0.07	$C_4H_{10}S$	1	0.07	0.01
n-Propyl mercaptan	< 0.05	C_3H_8S	1	< 0.05	< 0.01
Ethyl methyl sulfide	< 0.05	C_3H_8S	1	< 0.05	< 0.01
Thiophene	0.19	C_4H_4S	1	0.19	0.03
Isobutyl mercaptan	< 0.05	$C_4H_{10}S$	1	< 0.05	< 0.01
Diethyl sulfide	< 0.05	CH ₃ CH ₂ SCH ₂ CH ₃	1	< 0.05	< 0.01
n-Butyl mercaptan	< 0.05	$C_4H_{10}S$	1	< 0.05	< 0.01
3-Methyl Thiophene	< 0.05	C₅H ₆ S	1	< 0.05	< 0.01
Dimethyl disulfide	0.04	CH ₃ SSCH ₃	2	0.08	0.01
Tetrahydrothiophene	< 0.05	$C_4H_8O_2S$	ī	< 0.05	< 0.01
2-Ethylthiophene	< 0.05	C_6H_8S	1	< 0.05	< 0.01
2,5-Dimethylthiopene	< 0.05	C_6H_8S	1	< 0.05	< 0.01
Diethyl disulfide	< 0.03	CH ₃ SSCH ₃	2	< 0.05	< 0.01
Total				<119.5	<19.87 ^C

Notes

A. April 29, 2010 LFG sample laboratory analytical results (see Attachment)

B. Determined by multiplying concentration by number of sulfur atoms in the molecule.

C. Calculation of SO₂ emission factor from sulfur content, as H_2S : (119.5 scf $H_2S/MMcf LFG$) (1 scf $SO_2/scf H_2S$) (64.06 lb. SO_2/mol) / (385.3 ft³/mol)

= 19.9 lb SO₂/MMcf LFG

* Sample calculation: SO₂ generation from hydrogen sulfide (H₂S):

(96.5 scf H₂S/MMcf LFG) (1 scf SO₂/scf H₂S) (64.06 lb.SO₂/mol) / (385.3 ft³/mol)

= 16.04 lb SO₂/MMcf LFG

Seminole Energy, LLC (April 28, 2010 Sample)

Sulfur Dioxide Emission Factor for LFG Combustion

	Measured		No.	Sulfur Content ^B	Resulting SO ₂	
LFG Influent Sulfur Compound	Concentrations ^A (ppmv)	Molecular Formula	Sulfur Atoms	as H ₂ S (ppmv)	Emission Rate (lb./MMcf)	
Hydrogen sulfide	96.5	H ₂ S	1	96.5	16.04 *	
Carbonyl sulfide	0.28	CSO	1	0.28	0.05	
Methyl mercaptan	8.15	CH₄S	1	8.15	1.36	
Ethyl mercaptan	0.06	C_2H_6S	1	0.06	0.01	
Dimethyl sulfide	13.5	C_2H_6S	1	13.5	2.24	
Carbon disulfide	0.04	CS ₂	2	0.08	0.01	
sopropyl mercaptan	0.13	C_3H_6S	1	0.13	0.02	
tert-Butyl mercaptan	0.07	$C_4H_{10}S$	1	0.07	0.01	
Thiophene	0.19	C_4H_4S	1	0.19	0.03	
Dimethyl disulfide	0.04	CH₃SSCH₃	2	0.08	0.01	
l'otal				119.0	19.79	

Notes

- A. April 29, 2010 LFG sample laboratory analytical results (see Attachment)
- B. Determined by multiplying concentration by number of sulfur atoms in the molecule.
- * Sample calculation: SO₂ generation from hydrogen sulfide (H₂S):

(96.5 scf H₂S/MMcf LFG) (1 scf SO₂/scf H₂S) (64.06 lb.SO₂/mol) / (385.3 ft³/mol)

= 16.04 lb SO₂/MMcf LFG

LFG Combustion Hydrogen Chloride Emission Factor

	Analytical Report		No.	HCl
LFG Influent Chlorine Coumpounds	Concentration 1	Molecular	Chlorine	Emission Factor
	(ppm)	Formula	Atoms	(lb./MMcf)
Freon 12 (Dichlorodifluoromethane)	0.520	CCl ₂ F ₂	2	0.098
Freon 114 (Dichlorotetrafluroethane)	< 0.200	$C_2Cl_2F_4$	2	< 0.038
Chloromethane	< 0.790	CH ₃ Cl	1	< 0.074
Vinyl Chloride	< 0.200	C₂HCl	1	< 0.019
Chloroethane	< 0.200	C ₂ H ₅ Cl	1	< 0.019
Freon 11 (Fluorotrichloromethane)	< 0.200	CFCl ₃	3	< 0.057
Freon 113 (1,1,2-trichloro-1,2,2-trifluoroethane)	< 0.200	$C_2Cl_2F_3$	2	< 0.038
3-Chloropropene	< 0.790	C ₃ H ₅ Cl	1	< 0.074
Methylene Chloride (Dichloromethane)	0.230	CH ₂ Cl ₂	2	0.043
1,2-Dichloroethene (as cis-1,2-Dichloroethene)	0.310	$C_2H_2Cl_2$	2	0.058
1,2-Dichloroethene (as trans-1,2-Dichloroethene)	< 0.200	$C_2H_2Cl_2$	2	< 0.038
1,1-Dichloroethane	< 0.200	$C_2H_4Cl_2$	2	< 0.038
1,1-Dichloroethene	< 0.200	$C_2H_2Cl_2$	2	< 0.038
Chloroform	< 0.200	CHCl ₃	3	< 0.057
1,1,1-Trichloroethane	< 0.200	$C_2H_3Cl_3$	3	< 0.057
Carbon Tetrachloride	< 0.200	CCl ₄	4	< 0.075
1,2-Dichloroethane	< 0.200	$C_2H_4Cl_2$	2	< 0.038
Trichloroethene	< 0.200	C_2HCl_3	3	< 0.057
1,2-dichloropropane	< 0.200	$C_3H_6Cl_2$	2	< 0.038
Bromodichloromethane	< 0.200	$CBrCl_2$	2	< 0.038
1,3-Dichloropropene (as cis-1,3-Dichloropropene)	< 0.200	$C_3H_4Cl_2$	2	< 0.038
1,3-Dichloropropene (as trans-1,3-Dichloropropene)	< 0.200	$C_3H_4Cl_2$	2	< 0.038
1,1,2-Trichloroethane	< 0.200	$C_2H_3Cl_3$	3	< 0.057
Tetrachloroethene (Perchloroethene)	0.360	C_2Cl_4	4	0.136
Dibromochloromethane	< 0.200	CHBr ₂ Cl	1	< 0.019
Chlorobenzene	<0.200	C ₆ H ₅ Cl	1	< 0.019
1,1,2,2-Tetrachloroethane	< 0.200	$C_2H_2Cl_4$	4	< 0.075
1,3-Dichlorobenzene	< 0.200	$C_6H_4Cl_2$	2	< 0.038
1,4-Dichlorobenzene	0.500	$C_6H_4Cl_2$	2	0.094
alpha-Chlorotoluene	< 0.200	C ₇ H ₇ Cl	1	< 0.019
1,2-Dichlorobenzene	<0.200	$C_6H_4Cl_2$	2	< 0.038
1,2,4-Trichlorobenzene	< 0.790	$C_6H_3Cl_3$	3	< 0.223
Hexachlorobutadiene	<0.790	C ₄ Cl ₆	6	< 0.447
Total hydrogen chloride emission factor (lb./MMcf))			<2.23

Notes

= 0.10 lb. HCl/MMcf LFG

^{1.} May 19, 2010 LFG sample laboratory analytical results (see Attachment)

^{*} Example calculation for Freon 12 that assumes complete conversion of chloride to HCl

^{(0.52} ft³ Freon 12/MMcf LFG) (2 mol HCl/mol Freon 12) (36.46 lb. HCl/mol) / (387 ft³/mol)

Seminole Energy, LLC (April 29, 2010 Sample)

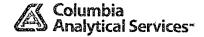
LFG Combustion Hydrogen Chloride Emission Factor

	Measured		No.	HCl
LFG Influent Chlorine Compounds ¹	Concentration Molecul (ppm) Formul		Chlorine Atoms	Emission Factor (lb./MMcf)
Freon 12 (Dichlorodifluoromethane)	0.52	CCl ₂ F ₂	2	0.10 *
Methylene Chloride (Dichloromethane)	0.23	CH_2Cl_2	2	0.04
1,2-Dichloroethene (as cis-1,2-Dichloroethene)	0.31	$C_2H_2Cl_2$	2	0.06
Tetrachloroethene (Perchloroethene)	0.36	C_2Cl_4	4	0.14
1,4-Dichlorobenzene	0.50	$C_6H_4Cl_2$	2	0.09
Total hydrogen chloride emission factor (lb./MMe	cf)			0.43

Notes

- 1. May 19, 2010 LFG sample laboratory analytical results (see Attachment)
- * Example calculation for Freon 12 that assumes complete conversion of chloride to HCl (0.52 ft³ Freon 12/MMcf LFG) (2 mol HCl/mol Freon 12) (36.46 lb. HCl/mol) / (387 ft³/mol)

= 0.10 lb. HCl/MMcf LFG



2655 Park Center Drive, Suita A

Simil Valley, CA 9308:

305,526,7161

TROS SUR JUSTO SUR

www.caslab.com

Client:

Derenzo and Associates, Inc.

CAS Project No:

P1001496

Project:

Seminole Energy / 1001025A

CASE NARRATIVE

The samples were received intact under chain of custody on April 29, 2010 and were stored in accordance with the analytical method requirements. Please refer to the sample acceptance check form for additional information. The results reported herein are applicable only to the condition of the samples at the time of sample receipt.

Sulfur Analysis

The samples were analyzed for twenty sulfur compounds per ASTM D 5504-08 using a gas chromatograph equipped with a sulfur chemiluminescence detector (SCD). All compounds with the exception of hydrogen sulfide and carbonyl sulfide are quantitated against the initial calibration curve for methyl mercaptan.

The results of analyses are given in the attached laboratory report. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for utilization of less than the complete report.

Client:

Derenzo and Associates, Inc.

Project:

Seminole Energy/1001025A

Service Request: P1001496

SAMPLE CROSS-REFERENCE

SAMPLE#	CLIENT SAMPLE ID	<u>DATE</u>	<u>TIME</u>
P1001496-001	SE-1	4/28/10	16:50
P1001496-002	SE-2	4/28/10	16:45

Columbia Analytical Services, Inc. Sample Acceptance Check Form

Client:	Derenzo and	Associates, Inc.				Work order:	P1001496			
Project:	Serminole En	ergy / 1001025A								
Sample(s	s) received on	4/29/2010			Date opened:	: 4/29/2010	by:	ADAV	'ID	
Note: This f	orm is used for all	samples received by CAS.	The use of this for	m for custody seal	s is strictly meant	to indicate presence/	absence and not as a	n indicatio	on of	
compliance o	or nonconformity.	Thermal preservation and p	H will only be eva	luated either at the	e request of the cli	ient and/or as require	d by the method/SOI		Nia	N/A
	XX /	4			T>0			<u>Yes</u> ⊠	<u>№</u>	<u>N/A</u>
	_	containers properly	marked with o	ilent sample i	יט?					
	Container(s) supplied by CAS? Did sample containers arrive in good condition?									
	-	•		!				\boxtimes		
		of-custody provided?						\boxtimes		
		n-of-custody properly	-					X		
	_	ontainer labels and/o			pers?			$\overline{\mathbf{x}}$		
		volume received adeq	•	sis?				\boxtimes		
	_	within specified holdi	_		•			X		
9		emperature (thermal	preservation)		-					X
		Cooler Temperature		°C Blank	Temperature		_°C	_	_	
10	Was a trip bl	i.								X
	-	supplied by CAS:					 .			_
11	_	seals on outside of o	ooler/Box?						\boxtimes	
	Location of			 			_Sealing Lid?			\boxtimes
	_	ure and date included	1?							\boxtimes
	Were seals i									$\overline{\times}$
	-	seals on outside of sa	mple containe	r?					\boxtimes	
	Location of seal(s)? Sealing Lid?						_Sealing Lid?			X
	_	ure and date included	!?							X
	Were seals i									\boxtimes
12	Do containers	have appropriate pre	servation, acc	cording to met	hod/SOP or C	Client specified i	nformation?			X
	Is there a clie	nt indication that the	submitted san	nples are pH p	reserved?					\boxtimes
	Were <u>VOA v</u>	ials checked for prese	nce/absence o	f air bubbles?						\boxtimes
	Does the clier	nt/method/SOP requir	e that the ana	lyst check the	sample pH an	id <u>if necessary</u> a	lter it?			X
13 ′	Tubes:	Are the tubes cap	ped and intact	:?	•					$\overline{\mathbf{x}}$
		Do they contain:	moisture?							\times
14	Badges:	Are the badges p	roperly cappe	d and intact?						X
		Are dual bed bad	lges separated	and individua	lly capped an	d intact?				X
LahS	ample ID	Container	Required	Received	Adjusted	VOA Headspac	e Recein	t / Prese	rvaller	
LAUS	n1.ihi- 11	Description	pII *	pH	pli	(Presence/Absence		ommen		
P1001496-	001.01	1.0 L Tedlar Bag	•							
P1001496-		1.0 L Tedlar Bag				<u> </u>	† 			
							+			
•	Explain any discrepancies: (include lab sample ID numbers):									
	he COC was not relinquished.									
he sample	e sample collection times were taken from the bag labels.									

^{*}Required pH: Phenols/COD/NH3/TOC/TOX/NO3+NO2/TKN/T.PHOS, H2SO4 (pH<2); Metals, HNO3 (pH<2); CN (NaOH or NaOH/Asc Acid) (pH>12); Diss. Sulfide, NaOH (pH>12); T. Sulfide, NaOH/ZnAc (pH>12) RSK - MEEPP, HCL (pH<2); RSK - CO2, (pH 5-8); Sulfur (pH>4)

COLUMBIA ANALYTICAL SERVICES, INC.

RESULTS OF ANALYSIS Page 1 of 1

Client:

Derenzo and Associates, Inc.

Client Sample ID: SE-1

Client Project ID: Seminole Energy / 1001025A

CAS Project ID: P1001496

CAS Sample ID: P1001496-001

Test Code:

ASTM D 5504-08

Instrument ID:

Agilent 7890A/GC22/SCD

Analyst:

Zheng Wang

Sampling Media:

1.0 L Tedlar Bag

Test Notes:

Date Collected: 4/28/10 Time Collected: 16:50 Date Received: 4/29/10 Date Analyzed: 4/29/10 Time Analyzed: 10:43

Volume(s) Analyzed:

0.10 ml(s)

6

CAS#	Compound	Result µg/m³	MRL		Result ppbV	MRL	Data Qualifier
7783-06-4	Hydrogen Sulfide	130,000	μg/m³ 70		94,000	ppbV 50	Quantier
463-58-İ	Carbonyl Sulfide	670		-	•	50	
•	•		120	ē	270		
74-93-1	Methyl Mercaptan	15,000	98		7,500	50	
75-08-1	Ethyl Mercaptan	ND	130		ND	50	
75-18-3	Dimethyl Sulfide	33,000	130		13,000	50	
75-15-0	Carbon Disulfide	120	78	,	37	25	,
75-33-2	Isopropyl Mercaptan	220	160		72	50	
75-66-1	tert-Butyl Mercaptan	ND	180		ND	50	
107-03-9	n-Propyl Mercaptan	ND	160		ND -	50	
624-89-5	Ethyl Methyl Sulfide	ND	160		ND	50	
110-02-1	Thiophene	540	170		160	50	
513-44-0	Isobutyl Mercaptan	ND	180		ND	50	•
352-93-2	Diethyl Sulfide	ND	180		ND	50	
109-79-5	n-Butyl Mercaptan	ND	180		ND	50	
624-92-0	Dimethyl Disulfide	140	96	,	37	25	
616-44-4	3-Methylthiophene	ND	200		ND	50	
110-01-0	Tetrahydrothiophene	ND	180		ND	50	
638-02-8	2,5-Dimethylthiophene	ND	230		ND	50	
872-55-9	2-Ethylthiophene	ND	230		ND	50	
110-81-6	Diethyl Disulfide	ND	120		ND	. 25	

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

P1001496_ASTM5504_1004300935_SS - Sample

COLUMBIA ANALYTICAL SERVICES, INC.

RESULTS OF ANALYSIS

Page 1 of 1

Client:

Derenzo and Associates, Inc.

Client Sample ID: SE-2

Client Project ID: Seminole Energy / 1001025A

CAS Project ID: P1001496

Date Collected: 4/28/10

Date Received: 4/29/10

Date Analyzed: 4/29/10

Time Collected: 16:45

CAS Sample ID: P1001496-002

Test Code:

ASTM D 5504-08

Instrument ID:

Agilent 7890A/GC22/SCD

Analyst:

Zheng Wang

Sampling Media:

1.0 L Tedlar Bag

Test Notes:

Time Analyzed: 11:02

Volume(s) Analyzed:

 $0.10 \, \text{ml(s)}$

CAS#	Compound	Result	MRL	Result	MRL	Data
		μg/m³	μg/m³	ppbV	ppbV	Qualifier
7783-06-4	Hydrogen Sulfide	140,000	70	99,000	50	
463-58-1	Carbonyl Sulfide	700	120	290	50	•
74-93-1	Methyl Mercaptan	17,000	98	8,800	50	
75-08-1	Ethyl Mercaptan	170	130	67	50	
75-18-3	Dimethyl Sulfide	35,000	130	14,000	50	
7.5-15-0	Carbon Disulfide	140	78	45	25	
75-33-2	Isopropyl Mercaptan	590	160	190	50	
75-66-1	tert-Butyl Mercaptan	310	180	85	50	
107-03-9	n-Propyl Mercaptan	ND	160 ·	ND	50	
624-89-5	Ethyl Methyl Sulfide	ND	160	ND	50	
110-02-1	Thiophene	730	170	210	50	
513-44-0	Isobutyl Mercaptan	ND	180	ND	50	
352-93-2	Diethyl Sulfide	ND	180	ND	50	
109-79-5	n-Butyl Mercaptan	ND	180	ND	50	
624-92-0	Dimethyl Disulfide	150	96	38	25	
616-44-4	3-Methylthiophene	ND	200	ND	50	
110-01-0	Tetrahydrothiophene	ND	180	ND ·	- 50	
638-02-8	2,5-Dimethylthiophene	ND	230	ND	50	
872-55-9	2-Ethylthiophene	ND	230	ND	50	
110-81-6	Diethyl Disulfide	ND	120	ND	25	

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

COLUMBIA ANALYTICAL SERVICES, INC.

RESULTS OF ANALYSIS Page 1 of 1

Client:

Derenzo and Associates, Inc.

Client Sample ID: Method Blank

Client Project ID: Seminole Energy / 1001025A

CAS Project ID: P1001496

CAS Sample ID: P100429-MB

Date Collected: NA

Time Collected: NA

Date Received: NA

Test Code:

ASTM D 5504-08

Instrument ID:

Agilent 7890A/GC22/SCD

Analyst:

Zheng Wang

Sampling Media:

1.0 L Tedlar Bag

Test Notes:

Date Analyzed: 4/29/10 Time Analyzed: 09:01 Volume(s) Analyzed:

1.0 ml(s)

8

CAS#	Compound	Result µg/m³	MRL μg/m³	Result ppbV	MRL ppbV	Data Qualifier
7783-06-4	Hydrogen Sulfide	ND	7.0	ND	5.0	
463-58-1	Carbonyl Sulfide	ND	12	, ND	5.0	
74-93-1	Methyl Mercaptan	ND	9.8	ND	5.0	•
75-08-1	Ethyl Mercaptan	. ND	13	ND	5.0	•
75-18-3	Dimethyl Sulfide	ND	13.	ND	5.0	
75-15-0	Carbon Disulfide	. ND	7.8	ND	2.5	,
75-33-2	Isopropyl Mercaptan	ND	16	ND	5.0	
75-66-1	tert-Butyl Mercaptan	ND .	18	ND	5.0	
107-03-9	n-Propyl Mercaptan	ND	16	ND	5.0	
624-89-5	Ethyl Methyl Sulfide	ND	16	ND	5.0	•
110-02-1	Thiophene	ND	17	ND	5.0	
513-44-0	Isobutyl Mercaptan	ND	18	ND	5.0	
352-93-2	Diethyl Sulfide	ND .	18	ND	5.0	•
109-79-5	n-Butyl Mercaptan	ND	18	ND	5.0	
624-92-0	Dimethyl Disulfide	ND	9.6	ND	2.5	
616-44-4	3-Methylthiophene	ND	20	ND	5.0	
110-01-0	Tetrahydrothiophene	ND	18	ND	5.0	
638-02-8	2,5-Dimethylthiophene	ND	23	ND	5.0	
872-55-9	2-Ethylthiophene	ND	23	ND	5.0	
110-81-6	Diethyl Disulfide	ND	12	ND	2.5	

ND = Compound was analyzed for, but not detected above the laboratory reporting limit.

MRL = Method Reporting Limit - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

P1001496_ASTM5504_1004300935_SS - MBlank



LABORATORY NARRATIVE Modified TO-15 Soil Gas Derenzo & Associates Workorder# 1005307

One 6 Liter Summa Canister sample was received on May 13, 2010. The laboratory performed analysis via modified EPA Method TO-15 using GC/MS in the full scan mode. The method involves concentrating up to 50 mLs of air. The concentrated aliquot is then flash vaporized and swept through a water management system to remove water vapor. Following dehumidification, the sample passes directly into the GC/MS for analysis.

This workorder was independently validated prior to submittal using 'USEPA National Functional Guidelines' as generally applied to the analysis of volatile organic compounds in air. A rules-based, logic driven, independent validation engine was employed to assess completeness, evaluate pass/fail of relevant project quality control requirements and verification of all quantified amounts.

Method modifications taken to run these samples are summarized in the table below. Specific project requirements may over-ride the ATL modifications.

Requirement	TO-15	ATL Modifications
Daily CCV	+- 30% Difference	= 30% Difference with two allowed out up to </=40%; flag and narrate outliers</p
Sample collection media	Summa canister	ATL recommends use of summa canisters to insure data defensibility, but will report results from Tedlar bags at client request
Method Detection Limit	Follow 40CFR Pt.136 App. B	The MDL met all relevant requirements in Method TO-15 (statistical MDL less than the LOQ). The concentration of the spiked replicate may have exceeded 10X the calculated MDL in some cases

Receiving Notes

Despite the use of flow controller for sample collection, the final canister vacuum for sample SE-1 were measured at ambient pressure in the field. This ambient pressure reading was confirmed by the laboratory upon sample receipt.

Analytical Notes

The canister in this work order was pressurized with Helium prior to sampling, per client request. Dilution factors have been adjusted accordingly.

Definition of Data Qualifying Flags

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:

- B Compound present in laboratory blank greater than reporting limit (background subtraction not performed).
 - J Estimated value.
 - E Exceeds instrument calibration range.
 - S Saturated peak.
 - Q Exceeds quality control limits.



- U Compound analyzed for but not detected above the reporting limit.
- UJ- Non-detected compound associated with low bias in the CCV
- N The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:

a-File was requantified

b-File was quantified by a second column and detector

r1-File was requantified for the purpose of reissue



Summary of Detected Compounds MODIFIED EPA METHOD TO-15 GC/MS

Client Sample ID: SE-1 Lab ID#: 1005307-01A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Freon 12	200	520	980	2600
Ethanol	790	140000 E	1500	270000 E
Acetone	790	23000	1900	55000
2-Propanol	790	20000	1900	48000
Methylene Chloride	200	230	690	810
Hexane	200	260	700	920
2-Butanone (Methyl Ethyl Ketone)	200	25000	580	74000
cis-1,2-Dichloroethene	200	310	780	1200
Tetrahydrofuran	200	4300	580	13000
Cyclohexane	200	330	680	1100
Benzene	200	1100	630	3600
Heptane	200	500	810	2000
4-Methyl-2-pentanone	200	1400	810	5900
Toluene	200	11000	740	41000
Tetrachloroethene	200	360	1300	2400
Ethyl Benzene	200	4700	860	20000
m,p-Xylene	200	9300	860	40000
o-Xylene	200	2900	860	12000
Styrene	200	800	840	3400
Cumene	200	430	970	2100
Propylbenzene	200	420	970	2100
4-Ethyltoluene	200	1700	970	8500
1,3,5-Trimethylbenzene	200	710	970	3500
1,2,4-Trimethylbenzene	200	1800	970	8700
1,4-Dichlorobenzene	200	500	1200	3000



Client Sample ID: SE-1 Lab ID#: 1005307-01A

MODIFIED EPA METHOD TO-15 GC/MS

File Name:	b051818	Date of Collection: 4/29/10 4:00:00 PM
Dil. Factor:	39.5	Date of Analysis: 5/18/10 05:26 PM

Dil. Factor:	39.5	Date of Analysis: 5/18/10 05:26 PM		/10 05:26 PM
	Rpt. Limit	Amount	Rpt. Limit	Amount
Compound	(ppbv)	(ppbv)	(ug/m3)	(ug/m3)
Freon 12	200	520	980	2600
Freon 114	200	Not Detected	1400	Not Detected
Chloromethane	790	Not Detected	1600	Not Detected
Vinyl Chloride	200	Not Detected	500	Not Detected
1,3-Butadiene	200	Not Detected	440	Not Detected
Bromomethane	200	Not Detected	770	Not Detected
Chloroethane	200	Not Detected	520	Not Detected
Freon 11	200	Not Detected	1100	Not Detected
Ethanol	790	140000 E	1500	270000 E
Freon 113	200	Not Detected	1500	Not Detected
1,1-Dichloroethene	200	Not Detected	780	Not Detected
Acetone	790	23000	1900	55000
2-Propanol	790	20000	1900	48000
Carbon Disulfide	200	Not Detected	620	Not Detected
3-Chloropropene	790	Not Detected	2500	Not Detected
Methylene Chloride	200	230	690	810
Methyl tert-butyl ether	200	Not Detected	710	Not Detected
trans-1,2-Dichloroethene	200	Not Detected	780	Not Detected
Hexane	200	260	700	920
1,1-Dichloroethane	200	Not Detected	800	Not Detected
2-Butanone (Methyl Ethyl Ketone)	200	25000	580	74000
cis-1,2-Dichloroethene	200	310	780	1200
Tetrahydrofuran	200	4300	580	13000
Chloroform	200	Not Detected	960	Not Detected
1,1,1-Trichloroethane	200	Not Detected	1100	Not Detected
Cyclohexane	200	330	680	1100
Carbon Tetrachloride	200	Not Detected	1200	Not Detected
2,2,4-Trimethylpentane	200	Not Detected	920	Not Detected
Benzene	200	1100	630	3600
1,2-Dichloroethane	200	Not Detected	800	Not Detected
Heptane	200	500	810	2000
Trichloroethene	200	Not Detected	1100	Not Detected
1,2-Dichloropropane	200	Not Detected	910	Not Detected
1,4-Dioxane	790	Not Detected	2800	Not Detected
Bromodichloromethane	200	Not Detected	1300	Not Detected
cis-1,3-Dichloropropene	200	Not Detected	900	Not Detected
4-Methyl-2-pentanone	200	1400	810	5900
Toluene	200	11000	740	41000
trans-1,3-Dichloropropene	200	Not Detected	900	Not Detected



Client Sample ID: SE-1 Lab ID#: 1005307-01A

MODIFIED EPA METHOD TO-15 GC/MS

File Name:	b051818	Date of Collection: 4/29/10 4:00:00 PM
Dil. Factor:	39.5	Date of Analysis: 5/18/10 05:26 PM

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Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
1,1,2-Trichloroethane	200	Not Detected	1100	Not Detected
Tetrachloroethene	200	360	1300	2400
2-Hexanone	790	Not Detected	3200	Not Detected
Dibromochloromethane	200	Not Detected	1700	Not Detected
1,2-Dibromoethane (EDB)	200	Not Detected	1500	Not Detected
Chlorobenzene	200	Not Detected	910	Not Detected
Ethyl Benzene	200	4700	860	20000
m,p-Xylene	200	9300	860	40000
o-Xylene	200	2900	860	12000
Styrene	200	800	840	3400
Bromoform	200	Not Detected	2000	Not Detected
Cumene	200	430	970	2100
1,1,2,2-Tetrachloroethane	200	Not Detected	1400	Not Detected
Propylbenzene	200	420	970	2100
4-Ethyltoluene	200	1700	970	8500
1,3,5-Trimethylbenzene	200	710	970	3500
1,2,4-Trimethylbenzene	200	1800	970	8700
1,3-Dichlorobenzene	200	Not Detected	1200	Not Detected
1,4-Dichlorobenzene	200	500	1200	3000
alpha-Chlorotoluene	200	Not Detected	1000	Not Detected
1,2-Dichlorobenzene	200	Not Detected	1200	Not Detected
1,2,4-Trichlorobenzene	790	Not Detected	5900	Not Detected
Hexachlorobutadiene	790	Not Detected	8400	Not Detected

E = Exceeds instrument calibration range.

Container Type: 6 Liter Summa Canister

		Method	
Surrogates	%Recovery	Limits	
1,2-Dichloroethane-d4	97	70-130	
Toluene-d8	100	70-130	
4-Bromofluorobenzene	105	70-130	



Client Sample ID: Lab Blank Lab ID#: 1005307-02A

MODIFIED EPA METHOD TO-15 GC/MS

File Name: Dil. Factor:	ь 0 51809 1.00		of Collection: NA of Analysis: 5/18	/10 11:16 AM
	Rpt. Limit	Amount	Rpt. Limit	Amount
Compound	(ppbv)	(ppbv)	(ug/m3)	(ug/m3)
Freon 12	5.0	Not Detected	25	Not Detected
Freon 114	5.0	Not Detected	35	Not Detected
Chloromethane	20	Not Detected	41	Not Detected
Vinyl Chloride	5.0	Not Detected	13	Not Detected
1,3-Butadiene	5.0	Not Detected	11	Not Detected
Bromomethane	5.0	Not Detected	19	Not Detected
Chloroethane	5.0	Not Detected	13	Not Detected
Freon 11	5.0	Not Detected	28	Not Detected
Ethanol	20	Not Detected	38	Not Detected
Freon 113	5.0	Not Detected	38	Not Detected
1,1-Dichloroethene	5.0	Not Detected	20	Not Detected
Acetone	20	Not Detected	48	Not Detected
2-Propanol	20	Not Detected	49	Not Detected
Carbon Disulfide	5.0	Not Detected	16	Not Detected
3-Chloropropene	20	Not Detected	63	Not Detected
Methylene Chloride	5.0	Not Detected	17	Not Detected
Methyl tert-butyl ether	5.0	Not Detected	18	Not Detected
trans-1,2-Dichloroethene	5.0	Not Detected	20	Not Detected
Hexane	5.0	Not Detected	18	Not Detected
1,1-Dichloroethane	5.0	Not Detected	20	Not Detected
2-Butanone (Methyl Ethyl Ketone)	5.0	Not Detected	15	Not Detected
cis-1.2-Dichloroethene	5.0	Not Detected	20	Not Detected
Tetrahydrofuran	5.0	Not Detected	15	Not Detected
Chloroform	5.0	Not Detected	24	Not Detected
1,1,1-Trichloroethane	5.0	Not Detected	27	Not Detected
Cyclohexane	5.0	Not Detected	17	Not Detected
Carbon Tetrachloride	5.0	Not Detected	31	Not Detected
2,2,4-Trimethylpentane	5.0	Not Detected	23	Not Detected
Benzene	5.0	Not Detected	16	Not Detected
1,2-Dichloroethane	5.0	Not Detected	20	Not Detected
Heptane	5.0	Not Detected	20	Not Detected
Trichloroethene	5.0	Not Detected	27	Not Detected
1,2-Dichloropropane	5.0	Not Detected	23	Not Detected
1,4-Dioxane	20	Not Detected	72	Not Detected
Bromodichloromethane	5.0	Not Detected	34	Not Detected
cis-1,3-Dichloropropene	5.0	Not Detected	23	Not Detected
4-Methyl-2-pentanone	5.0	Not Detected	20	Not Detected
Toluene	5.0	Not Detected	19	Not Detected
trans-1,3-Dichloropropene	5.0	Not Detected	23	Not Detected



Client Sample ID: Lab Blank Lab ID#: 1005307-02A

MODIFIED EPA METHOD TO-15 GC/MS

File Name:	b051809	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 5/18/10 11:16 AM

	1.00	Dut	Bute of Analysis: 6/16/16 11:16 Am		
Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)	
1,1,2-Trichloroethane	5.0	Not Detected	27	Not Detected	
Tetrachloroethene	5.0	Not Detected	34	Not Detected	
2-Hexanone	20	Not Detected	82	Not Detected	
Dibromochloromethane	5.0	Not Detected	42	Not Detected	
1,2-Dibromoethane (EDB)	5.0	Not Detected	38	Not Detected	
Chlorobenzene	5.0	Not Detected	23	Not Detected	
Ethyl Benzene	5.0	Not Detected	22	Not Detected	
m,p-Xylene	5.0	Not Detected	22	Not Detected	
o-Xylene	5.0	Not Detected	22	Not Detected	
Styrene	5.0	Not Detected	21	Not Detected	
Bromoform	5.0	Not Detected	52	Not Detected	
Cumene	5.0	Not Detected	24	Not Detected	
1,1,2,2-Tetrachloroethane	5.0	Not Detected	34	Not Detected	
Propylbenzene	5.0	Not Detected	24	Not Detected	
4-Ethyitoluene	5.0	Not Detected	24	Not Detected	
1,3,5-Trimethylbenzene	5.0	Not Detected	24	Not Detected	
1,2,4-Trimethylbenzene	5.0	Not Detected	24	Not Detected	
1,3-Dichlorobenzene	5.0	Not Detected	30	Not Detected	
1,4-Dichlorobenzene	5.0	Not Detected	30	Not Detected	
alpha-Chlorotoluene	5.0	Not Detected	26	Not Detected	
1,2-Dichlorobenzene	5.0	Not Detected	30	Not Detected	
1,2,4-Trichlorobenzene	20	Not Detected	150	Not Detected	
Hexachlorobutadiene	20	Not Detected	210	Not Detected	

Container Type: NA - Not Applicable

		Method	
Surrogates	%Recovery	Limits	
1,2-Dichloroethane-d4	98	70-130	
Toluene-d8	98	70-130	
4-Bromofluorobenzene	100	70-130	



Client Sample ID: CCV Lab ID#: 1005307-03A

MODIFIED EPA METHOD TO-15 GC/MS

File Name: b051803 Date of Collection: NA
Dil. Factor: 1.00 Date of Analysis: 5/18/10 08:09 AM

Compound	%Recovery
Freon 12	104
Freon 114	105
Chloromethane	104
Vinyl Chloride	115
1,3-Butadiene	119
Bromomethane	109
Chloroethane	98
Freon 11	102
Ethanol	116
Freon 113	107
1,1-Dichloroethene	106
Acetone	105
2-Propanol	106
Carbon Disulfide	103
3-Chloropropene	106
Methylene Chloride	95
Methyl tert-butyl ether	110
trans-1,2-Dichloroethene	105
Hexane	105
1,1-Dichloroethane	106
2-Butanone (Methyl Ethyl Ketone)	108
cis-1,2-Dichloroethene	105
Tetrahydrofuran	. 109
Chloroform	102
1,1,1-Trichloroethane	106
Cyclohexane	102
Carbon Tetrachloride	104
2,2,4-Trimethylpentane	106
Benzene	104
1,2-Dichloroethane	105
-leptane	107
Trichloroethene	104
I,2-Dichloropropane	103
I,4-Dioxane	107
Bromodichloromethane	101
sis-1,3-Dichloropropene	106
1-Methyl-2-pentanone	112
Toluene	. 104
rans-1,3-Dichloropropene	108



Client Sample ID: CCV Lab ID#: 1005307-03A

MODIFIED EPA METHOD TO-15 GC/MS

 File Name:
 b051803
 Date of Collection: NA

 Dil. Factor:
 1.00
 Date of Analysis: 5/18/10 08:09 AM

Compound	%Recovery
1,1,2-Trichloroethane	104
Tetrachloroethene	104
2-Hexanone	108
Dibromochloromethane	106
1,2-Dibromoethane (EDB)	105
Chlorobenzene	102
Ethyl Benzene	106
m,p-Xylene	104
o-Xylene	103
Styrene	112
Bromoform	107
Cumene	106
1,1,2,2-Tetrachloroethane	101
Propylbenzene	103
4-Ethyltoluene	104
1,3,5-Trimethylbenzene	106
1,2,4-Trimethylbenzene	99
1,3-Dichlorobenzene	100
1,4-Dichlorobenzene	101
alpha-Chlorotoluene	123
1,2-Dichlorobenzene	101
1,2,4-Trichlorobenzene	85
Hexachlorobutadiene	89

Container Type: NA - Not Applicable

7,		Method	
Surrogates	%Recovery	Limits	
1,2-Dichloroethane-d4	97	70-130	
Toluene-d8	100	70-130	
4-Bromofluorobenzene	105	70-130	



Client Sample ID: LCS Lab ID#: 1005307-04A

MODIFIED EPA METHOD TO-15 GC/MS

File Name:	b051804	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 5/18/10 08:33 AM

Compound	%Recovery
Freon 12	102
Freon 114	107
Chloromethane	104
Vinyl Chloride	115
1,3-Butadiene	115
Bromomethane	113
Chloroethane	102
Freon 11	104
Ethanol	120
Freon 113	97
1,1-Dichloroethene	96
Acetone	104
2-Propanol	106
Carbon Disulfide	106
3-Chloropropene	109
Methylene Chloride	89
Methyl tert-butyl ether	111
trans-1,2-Dichloroethene	105
Hexane	107
1,1-Dichloroethane	101
2-Butanone (Methyl Ethyl Ketone)	108
cis-1,2-Dichloroethene	104
Tetrahydrofuran	110
Chloroform	102
1,1,1-Trichloroethane	105
Cyclohexane	102
Carbon Tetrachloride	106
2,2,4-Trimethylpentane	107
Benzene	105
1,2-Dichloroethane	103
Heptane	109
Trichloroethene	108
1,2-Dichloropropane	106
1,4-Dioxane	110
Bromodichloromethane	104
cis-1,3-Dichloropropene	112
4-Methyl-2-pentanone	112
Toluene	" 101
trans-1,3-Dichloropropene	111



Client Sample ID: LCS Lab ID#: 1005307-04A

MODIFIED EPA METHOD TO-15 GC/MS

•		
File Name:	b051804	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 5/18/10 08:33 AM

Compound	%Recovery
1,1,2-Trichloroethane	104
Tetrachloroethene	104
2-Hexanone	113
Dibromochloromethane	107
1,2-Dibromoethane (EDB)	108
Chlorobenzene	105
Ethyl Benzene	107
m,p-Xylene	107
o-Xylene	106
Styrene	115
Bromoform	108
Cumene	104
1,1,2,2-Tetrachloroethane	104
Propylbenzene	104
4-Ethyltoluene	106
1,3,5-Trimethylbenzene	109
1,2,4-Trimethylbenzene	103
1,3-Dichlorobenzene	104
1,4-Dichlorobenzene	106
alpha-Chlorotoluene	123
1,2-Dichlorobenzene	103
1,2,4-Trichlorobenzene	92
Hexachlorobutadiene	90

Container Type: NA - Not Applicable

2,1		Method Limits
Surrogates	%Recovery	
1,2-Dichloroethane-d4	99	70-130
Toluene-d8	100	70-130
4-Bromofluorobenzene	103	70-130