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SENDER'S DIRECT DIAL
(303) 256-3986

SENDER'S INTERNET ADDRESS
jsteeler@irwl.com

May 6, 2002

RECEIVED
MAY 06 2002
Office of Enforcement
Compliance & Environmental
Justice

HAND DELIVER
Ms. Dawn Tesorero
Technical Enforcement Program
U.S. Environmental Protection Agency
999 18th Street, Suite 300
Denver, CO 80202-2466

Re: First Request for Information Pursuant to § 104 of CERCLA for the Vasquez Boulevard/I-70 Site, Denver, Colorado

Dear Ms. Tesorero:

On behalf of Pepsi Bottling Group ("PBG"), the attached is intended to supplement PBG's earlier responses to the above-referenced information request. In earlier submittals, PBG has informed your office of ongoing expansion work at the PBG facility. As part of this work, a hydraulic lift was removed and hazardous wastes were removed from the site.

Responsive to question **9(h)** of the above-referenced information request, attached hereto is a letter report relating to removal of the hazardous waste.

If you have any questions regarding this letter or need further information (including further certification), please advise the undersigned.

Very truly yours,

Jonathan H. Steeler

JHS:jkw
Enclosure
526584

cc: David H. Patrick, Esq.
Dennis H. Hunter, Ph.D.

ORION
Environmental Solutions, Inc.

May 6, 2002

Jonathan Steeler, Esq.
Isaacson, Rosenbaum, Woods & Levy
633 17th Street, Suite 2200
Denver, CO 80202

RECEIVED
MAR 06 2002
Office of Enforcement
Compliance & Environmental
Justice

Hydraulic Oil Pit
PBG Denver, 3801 Brighton Boulevard
Orion Project Number 02-128

Dear Jon:

During construction at the Pepsi Bottling Group (PBG) facility located at 3801 Brighton Boulevard in Denver, the interior fleet maintenance shop of the facility was being renovated for other uses. The fleet shop had a hydraulic lift, and in the process of removing the lift, residual oil and sludge was identified in the hydraulic lift pit. PBG wanted to close the lift and pit. Therefore, Transportation & Industrial Services, Inc. (TIS) was contracted to remove the oil and sludge from the pit and conduct a visual examination of the pit for potential cracks.

On December 14, 2001, TIS vacuum pumped the oil and sludge from the pit into three empty drums for analysis for volatile organic compounds (VOCs) and Toxic Characteristic Leachate Procedure (TCLP) for eight RCRA metals. The laboratory results showed concentrations of cis-1,2-dichloroethene (700 ug/kg); ethylbenzene (600 ug/kg); tetrachloroethene (1,000 ug/kg); toluene (2,700 ug/kg); trichloroethene (3,400 ug/kg); total xylenes (3,900 ug/kg); and TCLP lead (48 mg/kg). Based on these analytical findings, PBG arranged to have Clean Harbors pick up and dispose the three drums as hazardous wastes under a uniform hazardous waste manifest. The three drums were labeled as hazardous waste and staged in an isolated area of the building until pickup by Clean Harbors. The drum contents were incinerated by Clean Harbors.

PBG and TIS personnel visually examined the hydraulic oil pit after the contents had been removed. The pit was confirmed to be concrete and in good condition with no evidence of cracks or physical deterioration. The pit was subsequently filled in gravel and concrete.

A copy of the chain of custody for shipment of the samples to the laboratory, the laboratory certificates, and the hazardous waste manifest are enclosed with this letter. If you have questions, please advise. Kind regards.

Very truly,
Orion Environmental Solutions

Dennis H. Hunter, Ph.D.
Certified Professional Environmental Auditor

Cc	B French	w/o enclosure
	J McKenna	w/o enclosure
	D Patrick, Esq.	w enclosure
	D Patton	w enclosure
	A Smith	w/o enclosure
	T Smith	w/o enclosure

2971 Hodges Landing Drive
Knoxville, TN 37920-8132

Phone: 865-577-7124
Fax: 865-577-0774
e-mail: dhhknx@juno.com

CHAIN OF CUSTODY RECORD / ANALYTICAL SERVICES AGREEMENT *

Evergreen Analytical Inc.
4036 Youngfield St.
Wheat Ridge, Colorado 80033
(303) 425-6021
FAX (303) 425-6854
(800) 845-7400
E-Mail info@EvergreenAnalytical.com

Report Results by: _____ (Date)*
Standard 2 working weeks ☒
3 day UST Analyses per Fee Schedule ☐
* Rush: ☐ 24 hrs ☐ 1 - 2 work days ☐ 3 - 5 work days ☐ 6 - 9 work days
*Rush analysis subject to additional fee

CLIENT: TIS
ADDRESS: 3772 Puritan Way, Unit #4
CITY: Erie STATE: CO ZIP: 80516
PHONE#: 303-833-1111 FAX #: 303-833-1119
REPORT TO (Mr/Ms): GE Johnson
INVOICE TO: TIS
PROJECT I.D.: PBG Hyd Oil Sludge
P.O. #: _____ EAL. QUOTE #: _____
Sampler: Gary E. Johnson (sign)

NOTE: IDENTIFY KNOWN HAZARDS BELOW

Please **PRINT** all information:

SAMPLE IDENTIFICATION	DATE SAMPLED	TIME	No. of Containers	MATRIX: Water-Drinking/Discharge/Ground (circle)	MATRIX: Soil / Solid / Air / Gas	MATRIX: Oil / Sludge / Multi-phase	TCLP VOA/BNA/Pest/Herb/Metals (circle)	VOA 8260/624 (circle)	BNA 8270/625 (circle)	Pesticides 8081/8141/608 (circle)	Pest/PCBs 8081/8082/608 (circle)	PCB Screen 8082 mod.	Herbicides 8151	BTEX 8021/602 (circle)/MTBE (circle)	TVPH 8015mod. (Gasoline)	TEPH 8015mod. (Diesel)	Total Metals-DW / NPDES / SW846 (circle & list metals below)	Dissolved Metals - DW / SW846 (circle & list metals below)	Oil & Grease 413.1	TRPH 418.1	TCLP 8 Metals						For Laboratory use only
Hyd Oil Sludge 1	12/14/01	1030	2					X													X						W.O.# 01-6852 B.O.F.# NA C/S (O) NA / NA C/S (I) 341 / FedEx Cooler Temp. °C 5 Seals Present Y / N / NA Seals Intact Y / N Samples Pres. Y / N / NA Headspace Y / N / NA By MD / _____ 01
						Sample Fraction		A													B						Loc 10
Instructions:						Container																					

Fax results to GE Johnson at 303-833-1119

* **Important Note:** By relinquishing samples client agrees to the terms and conditions on the reverse side hereof

Relinquished by: (Signature)	Date/Time	Received by: (Signature)	Date/Time	Relinquished by: (Signature)	Date/Time	Received by: (Signature)	Date/Time
Gary E. Johnson	12/15/01	[signature]	12/18/01 10:00				

Evergreen Analytical, Inc.
4036 Youngfield St., Wheat Ridge, CO 80033
(303) 425-6021

Client Sample ID	: Hyd Oil Sludge 1	**Client Project ID**	: PBG Hyd Oil Sludge
Lab Sample ID	: 01-6852-01A	**Lab Work Order**	: 01-6852
Date Collected	: 12/14/2001	**Sample Matrix**	: Oil
Date Received	: 12/18/2001	**Lab File ID**	: VOA31227\14382.D
Date Prepared	: 12/27/2001	**Method Blank**	: MB122701
Date Analyzed	: 12/27/2001	**Prep Factor**	: 1
		Effective Dilution	: 500

Method: SW8260B — **Hazardous Substance List - Volatile Organics** — **Units: µg/Kg**

Analyte	CAS #	Concentration	RL	PQL
Acetone	67-64-1	U	5000	50000
Benzene	71-43-2	U	250	2500
Bromodichloromethane	75-27-4	U	500	2500
Bromoform	75-25-2	U	500	2500
Bromomethane	74-83-9	U	500	5000
2-Butanone	78-93-3	U	5000	50000
Carbon disulfide	75-15-0	U	500	2500
Carbon tetrachloride	56-23-5	U	500	2500
Chlorobenzene	108-90-7	U	500	2500
Chloroethane	75-00-3	U	500	5000
2-Chloroethylvinylether	110-75-8	U	500	5000
Chloroform	67-66-3	U	500	2500
Chloromethane	74-87-3	U	500	5000
Dibromochloromethane	124-48-1	U	500	2500
1,1-Dichloroethane	75-34-3	U	500	2500
1,2-Dichloroethane	107-06-2	U	500	2500
1,1-Dichloroethene	75-35-4	U	500	2500
cis-1,2-Dichloroethene	156-59-2	700 J	500	2500
trans-1,2-Dichloroethene	156-60-5	U	500	2500
1,2-Dichloropropane	78-87-5	U	500	2500
cis-1,3-Dichloropropene	10061-01-5	U	500	2500
trans-1,3-Dichloropropene	10061-02-6	U	500	2500
Ethylbenzene	100-41-4	600 J	250	2500
2-Hexanone	591-78-6	U	2500	25000
Methylene chloride	75-09-2	U	500	2500
4-Methyl-2-pentanone	108-10-1	U	2500	25000
Styrene	100-42-5	U	500	2500
Tetrachloroethene	127-18-4	1000 J	600	2500
1,1,2,2-Tetrachloroethane	79-34-5	U	500	2500
Toluene	108-88-3	2700	250	2500
1,1,1-Trichloroethane	71-55-6	U	250	2500
1,1,2-Trichloroethane	79-00-5	U	500	2500
Trichloroethene	79-01-6	3400	500	2500
Vinyl acetate	108-05-4	U	500	5000
Vinyl chloride	75-01-4	U	500	5000
Total Xylene	1330-20-7	• 3900	250	2500

Surrogate Recovery		**QC Limits**
1,2-Dichloroethane-d4 (SS-1)	101%	79 - 115
Toluene-d8 (SS-2)	102%	82 - 113
4-Bromofluorobenzene (SS-3)	97%	74 - 122

Qualifiers:
U - Not Detected at the Reporting Limit (RL)
J - Analyte detected below Practical Quantitation Limit (PQL)
E - Extrapolated value. See rerun at dilution.
B - Analyte detected in the associated Method Blank
S - Spike Recovery outside accepted recovery limits
• - Compound detected above regulatory limit.
X - Not Applicable.

Analyst

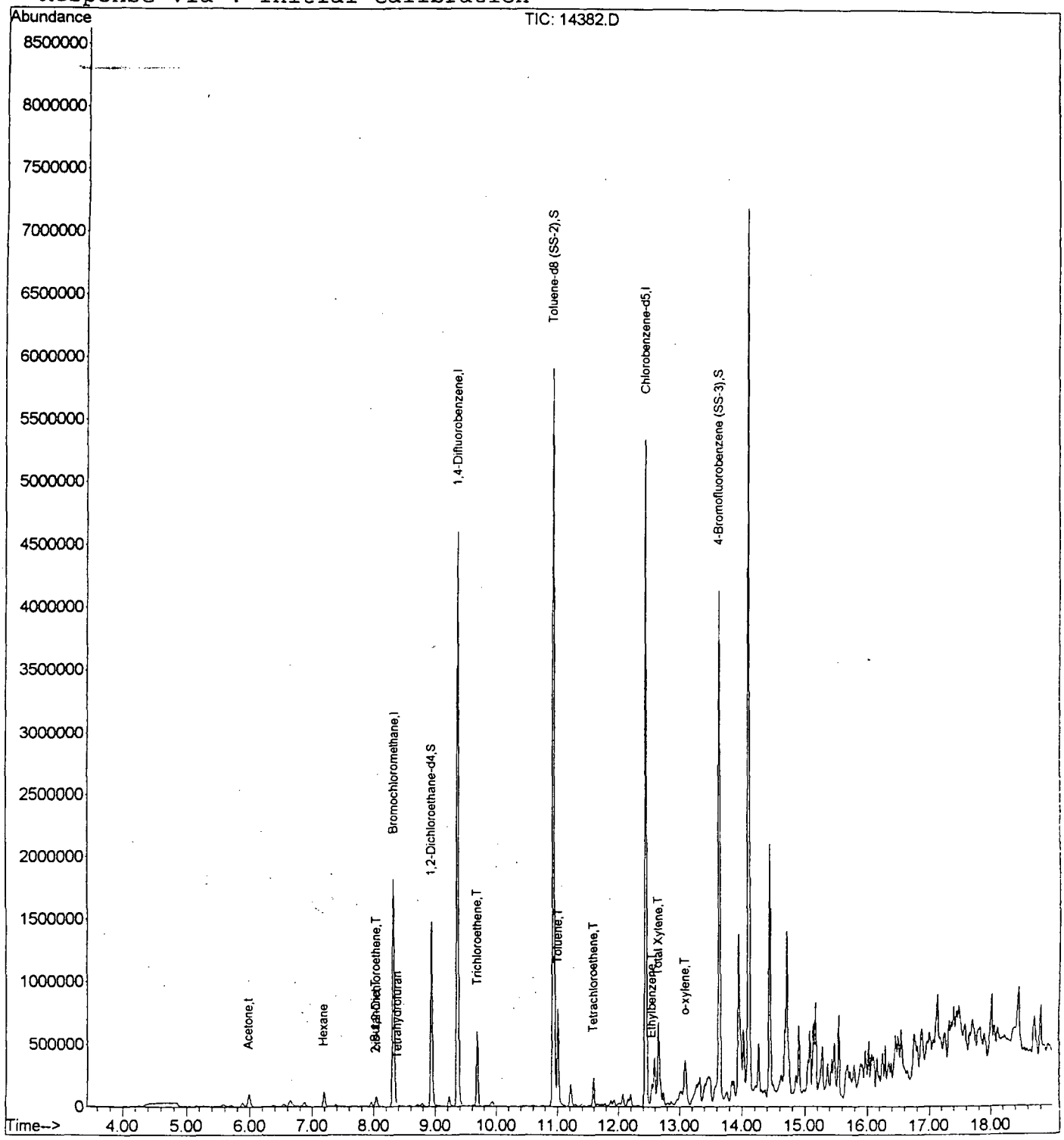
Approved

12/31/2001 3:32 PM

Data File : C:\HPCHEM\1\DATA\VOA31227\14382.D
Acq On : 27 Dec 2001 6:48 pm
Sample : 01-6852-01A DF=500
Misc : SAMP 8260_O
MS Integration Params: rteint.p
Quant Time: Dec 31 15:28 2001

Vial: 25
Operator: Steve Tyson
Inst : VOA3
Multiplr: 1.00
Quant Results File: 82601218.RES

Method : C:\HPCHEM\1\METHODS\82601218.M (RTE Integrator)
Title : 8260
Last Update : Tue Dec 18 11:58:46 2001
Response via : Initial Calibration



Evergreen Analytical, Inc.
4036 Youngfield St., Wheat Ridge, CO 80033
(303) 425-6021

Method Blank Report

Client Project ID : PBG Hyd Oil Sludge
Lab Sample ID : MB122701
Lab Work Order : 01-6852
Date Prepared : 12/27/2001
Lab File ID : VOA31227\14363.D
Date Analyzed : 12/27/2001
Prep Factor : 1
Effective Dilution : 125

Method: SW8260B — **VOA 8260** — **Units: µg/Kg**

Analyte	CAS #	Concentration	RL	PQL
Acetone	67-64-1	U	1200	12000
Benzene	71-43-2	U	62	620
Bromodichloromethane	75-27-4	U	120	620
Bromoform	75-25-2	U	120	620
Bromomethane	74-83-9	U	120	1200
2-Butanone	78-93-3	U	1200	12000
Carbon disulfide	75-15-0	U	120	620
Carbon tetrachloride	56-23-5	U	120	620
Chlorobenzene	108-90-7	U	120	620
Chloroethane	75-00-3	U	120	1200
2-Chloroethylvinylether	110-75-8	U	120	1200
Chloroform	67-66-3	U	120	620
Chloromethane	74-87-3	U	120	1200
Dibromochloromethane	124-48-1	U	120	620
1,1-Dichloroethane	75-34-3	U	120	620
1,2-Dichloroethane	107-06-2	U	120	620
1,1-Dichloroethene	75-35-4	U	120	620
cis-1,2-Dichloroethene	156-59-2	U	120	620
trans-1,2-Dichloroethene	156-60-5	U	120	620
1,2-Dichloropropane	78-87-5	U	120	620
cis-1,3-Dichloropropene	10061-01-5	U	120	620
trans-1,3-Dichloropropene	10061-02-6	U	120	620
Ethylbenzene	100-41-4	U	62	620
2-Hexanone	591-78-6	U	620	6200
Methylene chloride	75-09-2	U	120	620
4-Methyl-2-pentanone	108-10-1	U	620	6200
Styrene	100-42-5	U	120	620
Tetrachloroethene	127-18-4	U	150	620
1,1,2,2-Tetrachloroethane	79-34-5	U	120	620
Toluene	108-88-3	U	62	620
1,1,1-Trichloroethane	71-55-6	U	62	620
1,1,2-Trichloroethane	79-00-5	U	120	620
Trichloroethene	79-01-6	U	120	620
Vinyl acetate	108-05-4	U	120	1200
Vinyl chloride	75-01-4	U	120	1200
Total Xylene	1330-20-7	U	62	620

Surrogate Recovery		QC Limits
1,2-Dichloroethane-d4 (SS-1)	108%	79 - 115
Toluene-d8 (SS-2)	109%	82 - 113
4-Bromofluorobenzene (SS-3)	105%	74 - 122

Qualifiers:
U - Not Detected at the Reporting Limit (RL)
J - Analyte detected below Practical Quantitation Limit (PQL)
E - Extrapolated value. See rerun at dilution.
B - Analyte detected in the associated Method Blank
S - Spike Recovery outside accepted recovery limits
X - Not Applicable.

Analyst

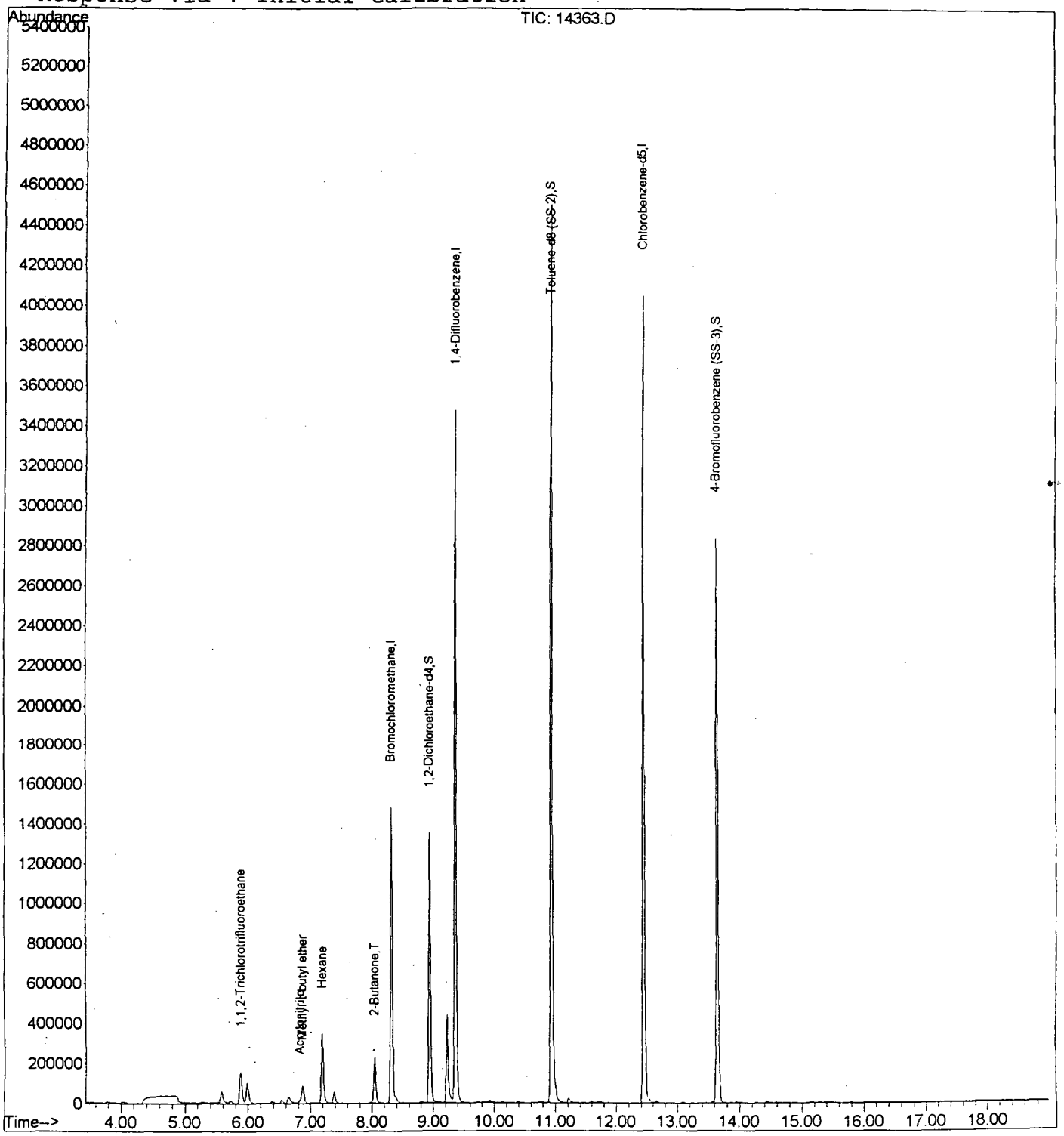
Approved

12/31/2001 3:32 PM

Data File : C:\HPCHEM\1\DATA\VOA31227\14363.D
Acq On : 27 Dec 2001 11:03 am
Sample : MB122701 DF=125
Misc : MBLK 8260_O
MS Integration Params: rteint.p
Quant Time: Dec 27 11:30 2001

Vial: 6
Operator: Steve Tyson
Inst : VOA3
Multiplr: 1.00
Quant Results File: 82601218.RES

Method : C:\HPCHEM\1\METHODS\82601218.M (RTE Integrator)
Title : 8260
Last Update : Tue Dec 18 11:58:46 2001
Response via : Initial Calibration



Evergreen Analytical, Inc

Date: *3-Jan-2002*

CLIENT: Transportation & Industrial Services, Inc
Work Order: 01-6852
Project: PBG Hyd Oil Sludge

QC SUMMARY REPORT
Laboratory Control Spike - generic

Sample ID: **LCS122701** Matrix: **Soil** Test Code: **SW8260B** Units: **µg/Kg** Run ID: **VOA-3_011227A** Prep Date: **27-Dec-2001**
Client ID: Batch ID: **VOA-3_011227A** Seq No: **358148** Analysis Date: **27-Dec-2001 11:52 AM**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Acetone	46.4	20	50	5	82.8%	81	185				B
Benzene	48.28	5	50	ND	96.6%	91	114				
Bromodichloromethane	48.18	5	50	ND	96.4%	79	128				
Bromoform	53.22	5	50	ND	106.4%	69	148				
Bromomethane	74.83	5	50	ND	149.7%	53	213				
2-Butanone	48.33	20	50	3	90.7%	77	179				B
Carbon disulfide	50.54	5	50	ND	101.1%	54	122				
Carbon tetrachloride	46.84	5	50	ND	93.7%	73	124				
Chlorobenzene	50.45	5	50	ND	100.9%	89	108				
Chloroethane	48.52	5	50	ND	97.0%	60	126				
2-Chloroethylvinylether	43.28	5	50	ND	86.6%	62	182				
Chloroform	48.91	5	50	ND	97.8%	79	115				
Chloromethane	49.34	10	50	ND	98.7%	34	125				
Dibromochloromethane	48.58	5	50	ND	97.2%	71	136				
1,1-Dichloroethane	49.57	5	50	ND	99.1%	82	114				
1,2-Dichloroethane	48.97	5	50	ND	97.9%	72	138				
1,1-Dichloroethene	48.49	5	50	ND	97.0%	76	116				
cis-1,2-Dichloroethene	50.83	5	50	ND	101.7%	83	107				
trans-1,2-Dichloroethene	49.31	5	50	ND	98.6%	78	112				
1,2-Dichloropropane	49.73	5	50	ND	99.5%	90	120				
cis-1,3-Dichloropropene	51.08	5	53	ND	96.4%	80	117				
trans-1,3-Dichloropropene	49.09	5	47	ND	104.4%	78	143				
Ethylbenzene	49.63	5	50	ND	99.3%	73	122				
2-Hexanone	50.68	10	50	ND	101.4%	62	219				
Methylene chloride	45.71	10	50	ND	91.4%	81	107				
4-Methyl-2-pentanone	46.65	20	50	ND	93.3%	65	207				
Styrene	54.52	5	50	ND	109.0%	71	107				S (2% HIGH)
Tetrachloroethene	47.11	5	50	ND	94.2%	68	121				
1,1,2,2-Tetrachloroethane	49.7	5	50	ND	99.4%	70	169				

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
* - Not applicable to matrix spikes or LCS.
E - Analyte detected above calibration limits
B - Analyte detected in the associated Method Blank
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits

CLIENT: Transportation & Industrial Services, Inc
Work Order: 01-6852
Project: PBG Hyd Oil Sludge

QC SUMMARY REPORT
Laboratory Control Spike - generic

Toluene	49.16	5	50	ND	98.3%	85	119	
1,1,1-Trichloroethane	47.92	5	50	ND	95.8%	77	126	
1,1,2-Trichloroethane	48.58	5	50	ND	97.2%	79	144	
Trichloroethene	48.78	5	50	ND	97.6%	82	114	
Vinyl acetate	51.58	5	50	ND	103.2%	70	124	
Vinyl chloride	47.42	5	50	ND	94.8%	48	123	
Total Xylene	53.58	5	50	ND	107.2%	71	108	
1,2-Dichloroethane-d4 (SS-1)	51.7	0	50	ND	103.4%	93	109	
Toluene-d8 (SS-2)	50.29	0	50	ND	100.6%	86	118	
4-Bromofluorobenzene (SS-3)	50.51	0	50	ND	101.0%	77	118	

Sample ID: **LCSD122701** Matrix: **Soil** Test Code: **SW8260B** Units: **µg/Kg** Run ID: **VOA-3_011227A** Prep Date: **27-Dec-2001**

Client ID: Batch ID: **VOA-3_011227A** Seq No: **358149** Analysis Date: **27-Dec-2001 12:17 PM**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Acetone	48.89	20	50	5	87.8%	81	185	46.4	5.8%	30	B
Benzene	47.88	5	50	ND	95.8%	91	114	48.28	0.8%	10	
Bromodichloromethane	48.82	5	50	ND	97.6%	79	128	48.18	1.3%	12	
Bromoform	58.26	5	50	ND	116.5%	69	148	53.22	9.0%	21	
Bromomethane	59.9	5	50	ND	119.8%	53	213	74.83	22.2%	30	
2-Butanone	50.53	20	50	3	95.1%	77	179	48.33	4.7%	30	B
Carbon disulfide	49.79	5	50	ND	99.6%	54	122	50.54	1.5%	15	
Carbon tetrachloride	47.92	5	50	ND	95.8%	73	124	46.84	2.3%	10	
Chlorobenzene	51.14	5	50	ND	102.3%	89	108	50.45	1.4%	10	
Chloroethane	47.53	5	50	ND	95.1%	60	126	48.52	2.1%	15	
2-Chloroethylvinylether	43.11	5	50	ND	86.2%	62	182	43.28	0.4%	30	
Chloroform	47.81	5	50	ND	95.6%	79	115	48.91	2.3%	10	
Chloromethane	47.77	10	50	ND	95.5%	34	125	49.34	3.2%	21	
Dibromochloromethane	50.42	5	50	ND	100.8%	71	136	48.58	3.7%	17	
1,1-Dichloroethane	47.82	5	50	ND	95.6%	82	114	49.57	3.6%	11	
1,2-Dichloroethane	47.55	5	50	ND	95.1%	72	138	48.97	2.9%	10	
1,1-Dichloroethene	48.43	5	50	ND	96.9%	76	116	48.49	0.1%	17	
cis-1,2-Dichloroethene	50.23	5	50	ND	100.5%	83	107	50.83	1.2%	10	
trans-1,2-Dichloroethene	48.73	5	50	ND	97.5%	78	112	49.31	1.2%	12	
1,2-Dichloropropane	49.01	5	50	ND	98.0%	90	120	49.73	1.5%	11	
cis-1,3-Dichloropropene	51.18	5	53	ND	96.6%	80	117	51.08	0.2%	13	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
* - Not applicable to matrix spikes or LCS.
E - Analyte detected above calibration limits
B - Analyte detected in the associated Method Blank
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits

CLIENT: Transportation & Industrial Services, Inc
Work Order: 01-6852
Project: PBG Hyd Oil Sludge

QC SUMMARY REPORT

Laboratory Control Spike Duplicate

trans-1,3-Dichloropropene	49.68	5	47	ND	105.7%	78	143	49.09	1.2%	16	
Ethylbenzene	49.45	5	50	ND	98.9%	73	122	49.63	0.4%	13	
2-Hexanone	54.05	10	50	ND	108.1%	62	219	50.68	6.4%	30	
Methylene chloride	45.72	10	50	ND	91.4%	81	107	45.71	0.0%	10	
4-Methyl-2-pentanone	48.9	20	50	ND	97.8%	65	207	46.65	4.7%	29	
Styrene	54.94	5	50	ND	109.9%	71	107	54.52	0.8%	13	S (3% HIGH)
Tetrachloroethene	47.18	5	50	ND	94.4%	68	121	47.11	0.1%	15	
1,1,2,2-Tetrachloroethane	52.46	5	50	ND	104.9%	70	169	49.7	5.4%	28	
Toluene	49.27	5	50	ND	98.5%	85	119	49.16	0.2%	10	
1,1,1-Trichloroethane	48.23	5	50	ND	96.5%	77	126	47.92	0.6%	10	
1,1,2-Trichloroethane	49.31	5	50	ND	98.6%	79	144	48.58	1.5%	18	
Trichloroethene	48.3	5	50	ND	96.6%	82	114	48.78	1.0%	10	
Vinyl acetate	49.55	5	50	ND	99.1%	70	124	51.58	4.0%	13	
Vinyl chloride	45.87	5	50	ND	91.7%	48	123	47.42	3.3%	18	
Total Xylene	53.36	5	50	ND	106.7%	71	108	53.58	0.4%	13	
1,2-Dichloroethane-d4 (SS-1)	51.19	0	50	ND	102.4%	93	109	ND	0.0%	20	
Toluene-d8 (SS-2)	50.2	0	50	ND	100.4%	86	118	ND	0.0%	20	
4-Bromofluorobenzene (SS-3)	50.25	0	50	ND	100.5%	77	118	ND	0.0%	20	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
* - Not applicable to matrix spikes or LCS.
E - Analyte detected above calibration limits
B - Analyte detected in the associated Method Blank
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits

Evergreen Analytical, Inc.
4036 Youngfield St., Wheat Ridge, CO 80033
(303) 425-6021

Client Sample ID : Hyd Oil Sludge 1
Lab Sample ID : 01-6852-01B
Date Collected : 12/14/2001
Date Received : 12/18/2001

Client Project ID : PBG Hyd Oil Sludge
Lab Work Order : 01-6852
Sample Matrix : Oil

Method: SW6020A — TCLP METALS ,OIL

Date Prepared : 01/02/2002
Date Analyzed : 01/03/2002
Lab File ID : 020103A.B\056SMPL.D\
Method Blank : MB-10857
Effective Dilution : 1

Compound Name	CAS Number	Concentration	RL	Units
Silver	7440-22-4	U	0.64	mg/Kg
Arsenic	7440-38-2	U	2	mg/Kg
Barium	7440-39-3	6.1	1.2	mg/Kg
Cadmium	7440-43-9	U	0.75	mg/Kg
Chromium	7440-47-3	U	2.2	mg/Kg
Lead	7439-92-1	48	1.4	mg/Kg
Selenium	7782-49-2	U	0.73	mg/Kg

Method: SW7470 — TCLP HG FOR OIL

Date Prepared : 01/02/2002
Date Analyzed : 01/04/2002
Lab File ID : 02010400
Method Blank : MB-10857HG
Effective Dilution : 1

Compound Name	CAS Number	Concentration	RL	Units
Mercury	7439-97-6	0.072	0.05	mg/Kg

Qualifiers:
U - Not Detected at the Reporting Limit (RL)
J - Analyte detected below Practical Quantitation Limit (PQL)
E - Extrapolated value. See rerun at dilution.
S - Spike Recovery outside accepted recovery limits
B - Analyte detected in the associated Method Blank. This value was not subtracted from the sample result.
* - Value exceeds maximum contamination limit (MCL)
R - Dilution Test RPD >10% indicates possible interference.

Analyst

Approved

1/07/2002 8:30 AM

Evergreen Analytical, Inc.
4036 Youngfield St., Wheat Ridge, CO 80033
(303) 425-6021

Method Blank Data Report

Lab Work Order : 01-6852
Lab Sample ID : MB-10857

Client Project ID : PBG Hyd Oil Sludge

Method: SW6020A — **TCLP METALS ,OIL**

Date Prepared : 01/02/2002
Date Analyzed : 01/03/2002
Lab File ID : 020103A.B\042SMPL.D\
Method Blank : MB-10857
Effective Dilution : 1

Compound Name	CAS Number	Concentration	RL	Units
Silver	7440-22-4	U	0.7	mg/Kg
Arsenic	7440-38-2	U	2.2	mg/Kg
Barium	7440-39-3	U	1.3	mg/Kg
Cadmium	7440-43-9	U	0.83	mg/Kg
Chromium	7440-47-3	U	2.4	mg/Kg
Lead	7439-92-1	U	1.5	mg/Kg
Selenium	7782-49-2	U	0.8	mg/Kg

Qualifiers:
U - Not Detected at the Reporting Limit (RL)
J - Analyte detected below Practical Quantitation Limit (PQL)
E - Extrapolated value. See rerun at dilution.
S - Spike Recovery outside accepted recovery limits
B - Analyte detected in the associated Method Blank

mc
Analyst

Approved

1/08/2002 8:52 AM

Evergreen Analytical, Inc.
4036 Youngfield St., Wheat Ridge, CO 80033
(303) 425-6021

Method Blank Data Report

Lab Work Order : 01-6852 **Client Project ID** : PBG Hyd Oil Sludge
Lab Sample ID : MB-10857HG

Method: SW7470 **MERCURY , OIL ,TOTAL BASIS**

Date Prepared : 01/04/2002 **Lab File ID** : 02010400 **Effective Dilution** : 1
Date Analyzed : 01/04/2002 **Method Blank** :

Compound Name	CAS Number	Concentration	RL	Units
Mercury	7439-97-6	U	0.07	mg/Kg

Qualifiers:
U - Not Detected at the Reporting Limit (RL)
J - Analyte detected below Practical Quantitation Limit (PQL)
E - Extrapolated value. See rerun at dilution.
S - Spike Recovery outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Analyst

Approved

1/08/2002 8:52 AM

Evergreen Analytical, Inc

Date: *8-Jan-2002*

CLIENT: Transportation & Industrial Services, Inc
Work Order: 01-6852
Project: PBG Hyd Oil Sludge

QC SUMMARY REPORT

Laboratory Control Spike - generic

Sample ID: **LCS-10857** Matrix: **Oil** Test Code: **SW6020A** Units: **mg/Kg** Run ID: **IMS-NT_020103A** Prep Date: **2-Jan-2002**

Client ID: Batch ID: **10857** Seq No: **359696** Analysis Date **3-Jan-2002 2:37 PM**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	19.8	0	25	ND	79.2%	75	125				
Barium	23.42	0	25	ND	93.7%	75	125				
Cadmium	2.056	0	2.5	ND	82.2%	75	125				
Chromium	22.78	0	25	ND	91.1%	75	125				
Lead	22.14	0	25	ND	88.6%	75	125				
Selenium	6.56	0	10	ND	65.6%	75	125				S
Silver	2.298	0	2.5	ND	91.9%	75	125				

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
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E - Analyte detected above calibration limits
B - Analyte detected in the associated Method Blank
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. C O D 0 0 7 0 6 9 4 4 6

Manifest Document No. 0 4 8 4 1

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Pepsi Bottling Group
3801 Brighton Boulevard
Denver, CO 80216

4. Generator's Phone (303) 299-4315

5. Transporter 1 Company Name: Clean Harbors Env Services Inc

6. US EPA ID Number: M A D 0 3 9 3 2 2 2 5 0

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
Clean Harbors Env Services Inc
5 miles South of Kimball on Highway 71
Kimball, NE 69145

10. US EPA ID Number: N E D 9 8 1 7 2 3 5 1 3

C. State Transporter's ID
D. Transporter's Phone
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM	11. US DOT Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a.	X	WASTE TOXIC, SOLID, INORGANIC, N.O.S., 6.1, UN3288, II	003	DM	00750	P
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
H2-DH1-H2-H3-K-55

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
wo# D9404841
IN EMERGENCY, CALL CHES 1-800-645-8265

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [illegible] | Signature: [illegible] | Month 0 3 Day 2 1 Year 0 2

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Steve Pooton | Signature: [illegible] | Month 0 3 Day 2 1 Year 0 2

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month | Day | Year

e permits for & will accept the was

GENERATOR'S COPY