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To: Craig Benson/R9/USEPA/US@EPA
cc: "Eric D. Nelson" <enelson@ene.com>, Ilona Martin <ilona@design-curve.com>, Linda Rovira <linda@consolidatedwaste.com>, Ed McGlothlin <cwi@consolidatedwaste.com>, Danielle Roberts <droberts@associatedlabs.com>
Subject: DICO Oil: Updated Analytical Results of Bulk Waste

Dear Mr. Benson,

Please find attached Tables 1, 2a, 2b and 2c that contain summary laboratory results and which incorporate your comments. This should be the complete set now of the bulk wastes. Please review again.

Under separate cover in couple of hours we will be submitting Supplement #3 to the Work Plan.

Have a good day.

Sincerely,
THE REYNOLDS GROUP,
a California corporation, by:
F. Edward Reynolds, Jr.
President

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20031030 dico bulk sampling spreadsheet TRG645

TABLE 1

US EPA UAO 9-2003-14
DICO Oil Co., Signal Hill, CA
Bulk Sample Summary Spreadsheet

Sample Date Thursday, October 2, 2003

Location	Valve mainfold on west side of tank	Valves at south and west sides of tank	Inside open hatch on east end of tank	Valve manifold at north end of tank	Composite from valves at north and south ends of tank	Valve at bottom of west end of tank
Description	liquid	black oily water and sludge	brown solid with soil	clear amber liquid	brown soily solid with light brown/orange sludge	clear light amber liquids
Sample Time	11:15 AM	12:26 PM	11:29 AM	12:04 PM	12:04 PM	12:42 PM
Sample Container	1 - 8 oz jar *2 - 40 ml VOA's*	2 - 8 oz jars *2 - 40 ml VOA's*	2 - 8 oz jars	1 -- 8 oz jar	1 - 8 oz jar	1 - 8 oz jar 4 - 40 ml VOA's
Preservative	none	none	none	none		
Storage	All samples were place in separate plastic baggies and stored and transported on ice.					
Photographic ID	#1	#1, #2	#3	#4, #7	#5, #6, #7	#8
Analyses/Extraction Methods	All samples analyzed per EPA Methods 418.1 / 418.1, 8260b / 5035, 8082 / 3545, 8081 / 3545, 6010 / 3050, 8270 / 3545					
Notes	No split samples were required by the EPA representative Eric Nelson. No duplicate samples were collected.					

TABLE 2A

ANALYTICAL RESULTS BULK SAMPLES (EPA Methods: 1010, 1030, 6010, and 1311)
DICO OIL, COMPANY
SIGNAL HILL, CALIFORNIA

TOTALS

Sample I.D.	Date Sampled	Ignitability EPA 1010 (degrees F)	Ignitability EPA 1030 (pass/fail)	Antimony EPA 6010 (mg/kg)	Arsenic EPA 6010 (mg/kg)	Barium EPA 6010 (mg/kg)	Beryllium EPA 6010 (mg/kg)	Cadmium EPA 6010 (mg/kg)	Chromium EPA 6010 (mg/kg)	Cobalt EPA 6010 (mg/kg)	Copper EPA 6010 (mg/kg)	Lead EPA 6010 (mg/kg)	Molybdenum EPA 6010 (mg/kg)	Nickel EPA 6010 (mg/kg)	Selenium EPA 6010 (mg/kg)	Silver EPA 6010 (mg/kg)	Vanadium EPA 6010 (mg/kg)	Zinc EPA 6010 (mg/kg)
T3 Bottom	10/02/03	>200 F	NA	<0.62	<0.72	1.71	<0.16	<0.06	0.253 J	0.122 J	7.85	4.66	0.962 J	0.751 J	<0.55	0.151 J	<0.17	6.52
T3 Composite	10/02/03	65 F	NA	1.31 J	12.7	334	<0.16	5.27	21.2	2.58	908	1,760	6.24	23.9	0.995 J	0.798	17.1	477
T2 Solid	10/02/03	NA	Pass	16.7	45.7	1,010	0.539	8.17	498	36.6	1,140	2,070	117	294	6.68	2.25	241	1,850
TB Liquid	10/02/03	>200 F	NA	<0.62	<0.72	0.369 J	<0.16	<0.06	0.651 J	0.091 J	0.409 J	0.574	1.04	0.319 J	0569 J	0.126 J	<0.17	5.640
TB Sludge	10/02/03	NA	Pass	<0.62	2.43	33.3	<0.16	20.9	45.7	0.435 J	24.3	87.6	2.96	5.07	<0.55	0.221 J	8.68	11,600
T5 Liquid	10/02/03	>200 F	NA	<0.62	<0.72	0.334 J	<0.16	<0.06	<0.14	<0.06	1.11	6.87	<0.38	<0.29	<0.55	<0.12	<0.17	5.25
LMB-S	10/02/03	NA	NA	<0.62	<0.72	<0.05	<0.16	<0.06	<0.14	<0.06	<0.10	<0.16	<0.38	<0.29	<0.55	<0.12	<0.17	<0.07
Regulatory Levels																		
TTLC		NP	NP	500	500	10,000	75	100	2,500	8,000	2,500	1,000	3,500	2,000	100	500	2,400	5,000
STLC		NP	NP	15	5.0	100	0.75	1.0	5.0	80	25	5.0	350	20	1.0	5.0	24	250
TCLP		NP	NP	NP	5.0	100	NP	1.0	5.0	NP	NP	5.0	NP	NP	1.0	5.0	NP	NP

NOTES:
- EPA = Environmental Protection Agency
- mg/kg = Milligrams per kilogram
- LMB-s = Laboratory Method Blank-Solid
- J = Trace
- NP = Not Performed
- NA = Not Analyzed
- < = Less than reportable limit
- TCLP = Toxicity Characteristic Leaching Procedure
- TTLC = Total Threshold Limit Concentration
- STLC = Soluble Threshold Limit Concentration

TABLE 2B

ANALYTICAL RESULTS FOR BULK SAMPLES (EPA Method: 8260B)
DICO OIL COMPANY
SIGNAL HILL, CALIFORNIA

SAMPLE I.D.	DATE SAMPLED	1,2,4-TMB EPA 8260B (ug/kg)	1,3,5-TMB EPA 8260B (ug/kg)	MEK EPA 8260B (ug/kg)	Acetone EPA 8260B (ug/kg)	Benzene EPA 8260B (ug/kg)	Ethylbenzene EPA 8260B (ug/kg)	Isopropylbenzene EPA 8260B (ug/kg)	MTBE EPA 8260B (ug/kg)	Methylene Chloride EPA 8260B (ug/kg)	Napthalene EPA 8260B (ug/kg)	n-Butylbenzene EPA 8260B (ug/kg)	n-Propylbenzene EPA 8260B (ug/kg)	Tetrachloroethene EPA 8260B (ug/kg)	p-Isopropyltoluene EPA 8260B (ug/kg)	Tot Xylenes EPA 8260B (ug/kg)	Toluene EPA 8260B (ug/kg)	TCE EPA 8260B (ug/kg)
T3 Bottom	10/02/03	275	60 J	689 J	8,300	1,210	241 J	<0.38	1,330	<0.91	<0.60	<0.38	<0.32	<0.49	<0.32	1,350	2,980	<0.43
T3 Composite	10/02/03	76,900	25,100	<0.98	<3.81	3,570	20,100	6,000	1,060	27,800	<0.60	13,700	9,910	1,090	7,100	106,000	45,700	592 J
T2 Solid	10/02/03	51	18 J	<0.98	<3.81	<0.39	1.1 J	<0.38	<0.51	<0.91	<0.60	<0.38	<0.32	<0.49	<0.32	51	17 J	<0.43
TB Liquid	10/02/03	233 J	53 J	<0.98	19,300	515	137 J	<0.38	3,160	<0.91	300	<0.38	<0.32	<0.49	<0.32	756	855	<0.43
TB Sludge	10/02/03	34,500	11,200	<0.98	30,600 J	1,440 J	6,510	1,320 J	4,560 J	<0.91	22,300	8,810	3,340 J	<0.49	2,750 J	44,900	17,400	<0.43
T5 Liquid	10/02/03	165 J	<0.55	<0.98	11,900	<0.39	<0.41	<0.38	<0.51	<0.91	<0.60	<0.38	<0.32	<0.49	<0.32	112 J	<0.42	<0.43
LMB-S	10/02/03	<0.54	<0.55	<0.98	<3.81	<0.39	<0.41	<0.38	<0.51	<0.91	<0.60	<0.38	<0.32	<0.49	<0.32	<0.8	<0.42	<0.43

NOTES:
- EPA = Environmental Protection Agency
- mg/kg = Milligrams per kilogram
- LMB-s = Laboratory Method Blank-Solid
- J = Trace
- NA = Not Analyzed
- < = Less than reportable limit

TABLE 2C

ANALYTICAL RESULTS FOR BULK SAMPLES (EPA Methods: 1311/6010, 7471A, 418.1, 8270C, and 8082)
DICO OIL COMPANY
SIGNAL HILL, CALIFORNIA

TCLP

SAMPLE I.D.	DATE SAMPLED	Cadmium TCLP EPA 1311/6010 (mg/L)	Zinc TCLP EPA 1311/6010 (mg/L)	Benzene TCLP EPA 1311/8260 (mg/L)	Chromium TCLP EPA 1311/6010 (mg/L)	Mercury TCLP EPA 1311/6010 (mg/L)	Copper TCLP EPA 1311/6010 (mg/L)	Lead TCLP EPA 1311/6010 (mg/L)	Nickel TCLP EPA 6010 (mg/L)	Mercury EPA 7471A (mg/kg)	TRPH EPA 418.1 (mg/kg)	bis(2-Ethylhexyl)phthalate EPA 8270C (ug/kg)	Chrysene EPA 8270C (ug/kg)	2,4-DMP EPA 8270C (ug/kg)	2-Methylphenol EPA 8270C (ug/kg)	4-Methylphenol EPA 8270C (ug/kg)	Phenanthrene EPA 8270C (ug/kg)	Phenol EPA 8270C (ug/kg)	Total PCBs EPA 8082 (mg/kg)
T3 Bottom	10/02/03	NA	NA	0.58	NA	NA	NA	NA	NA	0.16	25	<36.1	<38.0	651	612	591	<19.4	408	<0.026
T3 Composite	10/02/03	NA	NA	1.1	NA	NA	0.044 J	7.38	NA	1.49	288,000	<36.1	<38.0	<37.1	<194.3	<211.4	<19.4	<229.8	<0.026
T2 Solid	10/02/03	NA	NA	NA	<0.002	<0.004	2.68	1.63	0.408	11.85	43,200	8,310	9,160	<37.1	<194.3	<211.4	16,300	<229.8	0.53
TB Liquid	10/02/03	NA	NA	NA	NA	NA	NA	NA	NA	<0.015	105	<36.1	<38.0	<37.1	<194.3	<211.4	<19.4	<229.8	<0.026
TB Sludge	10/02/03	<0.001	240	0.021	NA	NA	NA	0.54	NA	0.14	5,520	<36.1	<38.0	<37.1	<194.3	<211.4	<19.4	<229.8	<0.026
T5 Liquid	10/02/03	NA	NA	NA	NA	NA	NA	NA	NA	<0.015	<10	<36.1	<38.0	<37.1	<194.3	<211.4	<19.4	<229.8	<0.026
LMB-S	10/02/03	NA	NA	NA	NA	NA	NA	NA	NA	<0.015	<10	<36.1	<38.0	<37.1	<194.3	<211.4	<19.4	<229.8	<0.026
Regulatory Levels TCLP		1.0	NP	0.5	5.0	0.2	NP	5.0	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP

NOTES:
- EPA = Environmental Protection Agency
- mg/L = Milligrams per Liter
- mg/kg = Milligrams per kilogram
- LMB-s = Laboratory Method Blank-Solid
- J = Trace
- NP = Not Performed
- NA = Not Analyzed
- < = Less than reportable limit
- Total PCBs = Sum of PCB-1016, PCB -1221, PCB-1242, PCB-1248, PCB-1254, and PCB-1260, reporting limit I sum of reporting limits for each constituent
- TCLP = Toxicity Characteristic Leaching Procedure