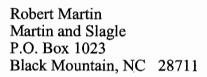


April 11, 2007



Dear Mr. Martin,

Enclosed is the Technical Memorandum for 1,4-Dioxane work recently performed at the Kuhlman Electric Corporation (KEC) facility in Crystal Springs, MS. If you have any questions concerning this information, give me a call.

Sincerely,

Kari An Kullian Fr Joseph Kubale

Enclosure

Technical Memorandum

Kuhlman Electric Corporation (KEC)

Crystal Springs, Mississippi



TECHNICAL MEMORANDUM

April 11, 2007

To:

Robert Martin

Martin and Slagle

From: Joseph Kubale

Re:

Field Analytical Methods

1,4-Dioxane

Kuhlman Electric Corporation (KEC)

Crystal Springs, MS

Introduction

This Technical Memorandum provides documentation of the field analytical test methods used to analyze water samples collected in September 2006 during the waterloo profile groundwater investigation near the Kuhlman Electric Corporation (KEC) facility in Crystal Springs, MS. The samples were analyzed direct injection GC/MSD/SIM for the 1,4-Dioxane.

Narrative

Waters

Water samples were extracted then analyzed for 1,4-Dioxane by direct injection GC/MSD/SIM.

The report limit for 1,4-Dioxane is 5.0µg/L for water samples.

A summary of test results is provided in Table 1. A summary of method blanks and matrix spike/matrix spike duplicate data is provided in Table 2.

In addition copies of the chain of custody sheets can be found in appendix A.

A) Chain of custody sheets for samples

Environmental Chemistry Consulting Services, Inc.

1,4-Dioxane Method Summary

Water Samples

Water samples were provided by the client to the field lab in 40mL VOA vials. Two 40mL VOA vials were filtered through a 3M 2272 activated carbon disk after adding 40uL of 25ug/mL Dioxane-d8 surrogate. The activated carbon disk was placed in a 3 dram vial containing 8mL acetone and sonicated for 15 minutes. A 0.8mL subsample is aliquoted and transferred to an injection vial containing internal standard and injected into a calibrated GCMS system.

GC/MSD Procedure:

Identification of the target compound was done by matching retention times and mass spectra of peak found in samples to those found in a Dioxane calibration standard using the internal standards as a time reference peak. Quantitation was performed by the internal standard technique using a seven point standard curve generated from 5, 10, 20, 50, 100, 250, and 500 ng standards. These levels equate to 0.5, 1.0, 2.0, 5.0, 10, 25 and 50 μ g/L for water samples.

A Hewlett-Packard 5890 gas chromatograph with a 30m x 0.32mm RTX-624 micro-capillary column interfaced to a Hewlett-Packard 5972 MSD was used. The data system included a Hewlett-Packard Enviroquant chromatography workstation for data handling.

Quality control consisted of the following items:

- Initial calibration with % relative standard deviation less than 15% of individual response factors obtained from analysis of calibration standards
- Continuing Calibration Verification standards analyzed at a frequency of every ten samples or less
- Surrogate standard additions to samples
- Blank and LCS samples analyzed every twenty samples or less with a minimum of one per day per matrix.
- MS/MSD samples analyzed every twenty samples or less per matrix.
- Information documented in Field Logbook 150.

Table 1 Sample Results – September

		i :		GY I	ו אם, י' ו					
		Kuhlman El	Kuhlman Electric - Crystal Springs,	Springs,	ssippi - Vo	ssippi - Volatiles Detected in Water	ted in Water			د دهمی
		W1699	W1700	W1701	W1702	W1703	W1704	W1705	W1706	W1707
		KEP-	KEP-GW	KEP-GW	KEP-GW	KEP-GW	KEP-GW	KEP-GW	KEP-GW	KEP-GW
		FB	002	003	004	900	900	200	800	600
		012	900	900	900	900	900	900	005	003
	Depth	•	•		•	,	ı	,	,	,
	Date Collected	20-Sep-06	20-Sep-06	20-Sep-06	20-Sep-06	20-Sep-06	20-Sep-06	20-Sep-06	20-Sep-06	20-Sep-06
	Time Collected	13:40	15:30	20:20	17:45	14:05	12:30	10:20	11:40	19:15
	Date Analyzed	22-Sep-06	22-Sep-06	22-Sep-06	22-Sep-06	22-Sep-06	22-Sep-06	22-Sep-06	22-Sep-06	22-Sep-06
L	Reporting Limit									
VOLATILES	ng/L									
1,4-Dioxane	5.0	< 5.0	13	30	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Surrogates:										
1,4-Dioxane-D8	%	95.0	9.68	93.1	95.5	82.3	104	97.6	97.3	107

|--|

Table 2 QC Results – September

TABLE 2 QC Report

Lab # associated with qc samples:

W1699 through W1708

Matrix

Matrix

Spike

Spike

Duplicate

W1703

W1703

Blank

LCS

Date Analyzed:

9/22/06

9/22/06

9/22/06

9/22/06

Compound	% Rec	% Rec	% RPD	ug/L	% Rec
1,4-Dioxane	88.9%	87.0%	2%	< 5.0	89.7%

Appendix A

Chain of Custody Sheets for Samples

TODY No. 012486 ★	Pageof	Turn Around (circle one) Normal Rush	Report Due:	
 emistry CHAIN OF CUSTODY	ces, Inc.	Madison, WI 53718	FAX 608-221-4889	Moil Doort To:
Environmental Chemistry	Consulting Service	2525 Advance Road	Phone 608-221-8700 FA.	74
1 1				Droject Number

Phone 608-221-8700 FAX 608-221-4889			
		Kepar Due:	
The state of the s	1	Invoice To:	
Project Name: KUJ-UIIIN & LEC (1-1C Company: 1	MARTIN + SCARCLE	Company:	
Project Location: CMYS 7AC SPRINGS, D11 Address:		Address:	
Sampled By (Print), L SK (D & D /			
		P.O. No.: Quote No.:	
Collection		21	Laboratory
Sample Description Date Time Matrix Bottles Preserv*	Requested	Comments	Number
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KED -64-603-005 25 2020			oC) 01
12P-6W-604-005 Peac 1745			40C) W
KRD-6w-005-w5 2806/405			EOC) W
KRP-62-006-005 586 1230			90C)@
KRD-GW-007-005 38E6 1020			2001a1
KRP-6w-008-005 25 EG 1140			90ClM
KPD-GD-009-003 "Se, 1915			70C)W
KEP-DUPLICATE 3860 - J N J	ファ		80<1m
*Preservation Code Relinquished By:	Date/Time: Recrived B		Date/Time:
A=None B=HCL C=H2SO4	9/2/66 2030	Men 20 SCO6	2030
D=HNO3 E=EnCore F=Methanol Relinquished By: G=NaOH O=Other(Indicate)	Date/Time:		Date/Time:
Custody Seal: Present/Absent Intact/Not Intact Seal #'s	Receipt Temp:	du:	
Shipped Via:	Temp Blank	Z >	
	WHITE - REPORT COPY YELLOW - LABORATORY COPY	ATORY COPY PINK - SAMPLER/SUBMITTER	ER

Appendix B

FEDEX shipping label for Paradigm Labs

Express USA Airbill	Tracking Number 837784146668
From Please print and pross herd. Date 26 Reg Sender's FedEx Account Number	226281991
RICHARD VOHUS	Phone (60%) 358 - 2175
Company RCCS	
Address 2525 AD VA	UCR RD
City MADISON	State WZ ZIP 537(8
Your Internal Billing Reference First 24 characters will appear on invoice.	7호 상취(경원왕선 ⁴
To Recipient's JOE KUBACR	Phone (608) >>4-8700
COMPANY ECCS INC	
Address 2525 AD VA	UCR RD

Try online shipping at fedex com

By using this Airbill you agree to the service conditions on the back of this Airbill and in our current Service Guide, including terms that limit our liability.

Questions? Visit our Web site at fedex.com or call 1.800.Go.FedEx® 800.463.2339.

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	FedEx 2Day Second business day — FedEx Envelope rate not evail.	Third but	Express Saver siness day e-pound rate		
4b	Express Freight Se	rvice		Delivery comm	Packages over 150 lbs.
	FedEx 1Day Freight* Next business day	FedEx	t 2Day Freight business day		FedEx 3Day Freight Third business day
* Call	for Confirmation:				
5	Packaging				* Declared value limit \$500
	FedEx Envelope*		Pak* FedEx Small Pek, FedEx ik, end FedEx Sturdy Pak		Other
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Appendix C

Chain of Custody Sheets for samples sent to Paradigm Labs



CHAIN OF C ∴ODY RECORD SGS Environmental Services Inc.

054091

Alaska
 Louisiana
 New Jersey
 West Virginia

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Relinguished Rv. 73V						Special Deliverable Requirements:	l'ements:	(e)p
	Date.	Time	Received By:			Requested Turnaround Time and Special Instructions	Ime and Spec	MACCI BROKEN ABSENT
Relinquished By: (4)	Date	Пт	Received By:					

U 200 W. Potter Drive Anchorage, AK 99518 Tel: (907) 562-2343 Fax: (907) 561-5301 U 5500 Business Drive Wilmington, NC 28405 Tel: (910) 350-1903 Fax: (910) 350-1557

O 1258 Greenbrier Street Charleston, WV 25311 Tel: (304) 346-0725 Fex: (304) 346-0761

White - Retained by Lab



April 11, 2007

Robert Martin Martin & Slagle, LLC P.O. Box 1023 Black Mountain, NC 28711

Dear Mr. Martin,

Enclosed is the Technical Memorandum for work completed at the Kuhlman Electric Corporation (KEC) facility in Crystal Springs, Mississippi during the month of September. If you have any questions concerning this information, please give me a call.

Sincerely,

Kari-Ann Killian Richard Johnson

Enclosure

Technical Memorandum

Kuhlman Electric Corporation (KEC)

Crystal Springs, Mississippi



TECHNICAL MEMORANDUM

April 11, 2007

To: Robert Martin

Martin Slagle Inc.

From: Richard Johnson

ECCS, Inc.

Re: Field Analytical Methods – QC Summary

Kuhlman Electric Corporation (KEC) Facility

Crystal Springs, Mississippi

INTRODUCTION

This Technical Memorandum provides documentation of the field analytical test methods used to analyze water samples collected from KEP Property area during September 2006 during an accelerated site investigation episode around the Kuhlman Electric Corporation (KEC) facility in Crystal Springs, Mississippi. Water samples were analyzed for polychlorinated biphenyls (PCBs) and chlorinated benzenes by gas chromatography (GC) in accordance with ECCS's Polychlorinated Biphenyl (PCB) Mini Extraction Screening Procedure. A summary of test results is provided in Table 1. A summary of method blanks, laboratory control samples and matrix spike/matrix spike duplicate data is provided in Table 2.

In addition copies of the chain of custody sheets and shipping sheets can be found in appendix A through C.

- A) Chain of custody sheets for samples
- B) FEDEX shipping label for Paradigm Labs
- C) Chain of custody sheets for samples sent to Paradigm Labs

The PCB mini-extraction procedure is based on the existing EPA SW846 methods 8082/8141. The procedure incorporates all the quality control rigors of the full 8082/8141 methods including quantification based on 6-point calibration with continuing calibration verification, surrogate method performance monitoring, method blanks, laboratory control samples (LCS), and matrix spike/matrix spike (MS/MSD) duplicate samples. As such, you should consider these test results as comparable to what you would get from a fixed-based laboratory using the more-widely accepted extraction procedure.

Environmental Chemistry Consulting Services, Inc.

The primary project objective of the sampling and testing episode was to delineate the PCB contamination at and around the site using the accelerated site characterization approach. The mobile laboratory was required to provide data as quickly as possible to keep the accelerated site investigation process on track while trying to maintain a goal of level three data quality.

CASE NARRATIVE

During the episode, all samples collected were analyzed. To maintain rapid turnaround and to meet the project objective, three GCs were operated on a nearly continuous basis.

Quality control including proper calibration, continuing calibration verification, surrogates, method blanks, laboratory control samples and matrix spike/matrix spike duplicate samples was performed at the method-specified intervals. Overall quality of the data is very good. The following quality related issues should be noted:

- 1. All surrogate recoveries were within acceptable ranges.
- 2. All LCS recoveries were within acceptable ranges. See Table 2.
- 3. All MS/MSD recoveries were within acceptable ranges. Percent repeatability was also within acceptable ranges. See Table 2.
- 4. Since electron capture of detectors tend to have a very narrow linear range, many sample extracts required dilution. Dilutions were accurately done.

METHOD SUMMARY

This method employs a mini-extraction procedure and gas chromatography analysis for the detection of PCBs and chlorinated benzenes. Reporting limits are provided in the results Tables. Four grams of sample are dried with anhydrous sodium sulfate and extracted with eight mLs of 80/20 iso-octane/acetone. The extract is then analyzed by Gas Chromatography-Electron Capture Detector (GC-ECD).

Procedure

- 1. Standards Preparation Primary standards are prepared from a solution purchased from various vendors at Certified concentrations. Stock standards are prepared in suitable solvents and stored in a freezer when not in use. Secondary standards are prepared in 80/20 iso-octane/acetone and stored in a freezer when not in use. Standard curve mixes for this project was prepared at six concentrations: PCBs 0.05, 0.10, 0.20, 0.50, 1.0 and 2.0 ug/m; chlorinated benzenes 0.005, 0.01, 0.02, 0.05, 0.10 and 0.20 ug/ml.
- 2. Sample Preparation SOILS: Each sample or quality control sample is prepared in identical fashion. Approximately four grams of silica sand (blanks and control spikes) or sample is transferred into a clean scintillation vial. Ten grams of anhydrous sodium sulfate are added to the vial and mixed well. Extra sodium sulfate is added when necessary to assure the sample is dried. A surrogate, spike compound mix (if necessary) and eight mLs of 80/20 iso-octane/acetone are added to the vial. The vial is shaken for 30 seconds, allowed to settle for 2 minutes, shaken again for 30 seconds, and allowed to settle for 10 minutes. An aliquot of the extract is transferred to an autosampler vial for injection into the GC-ECD.
- 3. WATER Samples: 200 grams of water was weighed into a clean jar containing 50 grams of sodium chloride. The samples were spiked with a surrogate in addition the LCS/MS/MSD were spiked with PCB's and chlorinated benzenes. Added 10 ml of isooctane to each and shake 3 times for 2 minutes each time. Samples were allowed to settle for approximately 5 minutes between each shake. Isooctane was decanted into a scintillation vial and then an aliquot was transferred to an autosampler vial. Then extracts were injected into a GC-ECD.
- 4. GC-ECD Analysis A sample aliquot is injected into an HP5890 GC with an ECD equipped with an HP ChemStation for data processing. PCBs were identified by matching retention times of standards to the same retention time in the sample. Regression analysis was performed on each of the selected peak's height verses concentration of the standard using a LN/LN transformed linear regression. For PCBs nine peaks were selected for quantification. The ug/mL value for each peak was added together and divided by the number of peaks selected to obtain the total PCB ug/mL result. If interference occurred at any of the peaks, these peaks were not included in the total, and the divisor was reduced accordingly.
- 5. Quality Control Quality control consisted of the following items:
 - Continuing calibration standards analyzed every ten samples or less and at the end of a run.
 - Blank and LCS samples analyzed every twenty sample or less with a minimum of one per day.
 - MS/MSD samples analyzed every twenty samples or less with a minimum of one per day.
 - Information is documented in logbook 45 and September run sheets.
- 6. Instrument Conditions Two HP5890 gas chromatographs were equipped with RTX-35 capillary columns. Each system had a Leap Technologies A200S auto-sampler and an HP ChemStation for data handling.

Table 1 Sample Results – September

Kuhlmari Electric Crystal Springs, Mississippi Chlorinated Benzenes Concentrations Detected in ug/L

								Field Laboratory	oratory			
Depth		Date Collected	Time Collected	Date Analyzed	1,3,5- Trichloro- benzene	1,2,4- Trichloro- benzene	1,2,3- Trichloro- benzene	1,2,3,5-8 1,2,4,5- Tetrachloro- benzene	1,2,3,4 Tetrachloro- benzene	Penta- chloro- benzene	Hexa- chloro- benzene	Surrogate TCMX(%)
		20-Sep-06	13-40	30 con 06	70.025	3000	3000	7.0050	3000	3000	2000	400
,		20-Sep-06	15:30	20-Sep-06	< 0.025	< 0.025	< 0.025	< 0.050	0.025	< 0.025	< 0.025	27.9
1	_	20-Sep-06	20:20	21-Sep-06	< 0.025	< 0.025	0.16	< 0.050	0.096	< 0.025	< 0.025	96.0
-		20-Sep-06	17:45	20-Sep-06	< 0.025	< 0.025	0.057	< 0.050	< 0.025	< 0.025	< 0.025	68.6
•	_	20-Sep-06	14:05	20-Sep-06	< 0.025	< 0.025	< 0.025	< 0.050	< 0.025	< 0.025	< 0.025	99.9
		20-Sep-06	12:30	20-Sep-06	< 0.025	< 0.025	< 0.025	< 0.050	0.080	0.076	< 0.025	112
•		20-Sep-06	10:20	20-Sep-06	< 0.025	< 0.025	< 0.025	< 0.050	< 0.025	< 0.025	< 0.025	87.1
-		20-Sep-06	11:40	20-Sep-06	< 0.025	< 0.025	< 0.025	< 0.050	< 0.025	< 0.025	< 0.025	88.9
,	_	20-Sep-06	19:15	20-Sep-06	< 0.025	< 0.025	< 0.025	< 0.050	< 0.025	< 0.025	< 0.025	6.96
1		20-Sep-06		20-Sep-06	< 0.025	< 0.025	< 0.025	< 0.050	< 0.025	< 0.025	< 0.025	70.2

Table 2 QC Samples - September

Table 2 QC Results

Lab # associated with qc samples:

W1699 through W1708

Matrix

Matrix

Spike

Spike

Duplicate

W1705

W1705

Blank

LCS

Date Analyzed:

9/20/06

9/20/06

9/20/06

9/20/06

Compound	% Rec	% Rec	% RPD	ug/L	% Rec
1,3,5-Trichlorobenzene	109	121	-10%	< 0.025	122
1,2,4-Trichlorobenzene	110	124	-12%	< 0.025	123
1,2,3-Trichlorobenzene	106	119	-12%	< 0.025	121
1,2,3,5- & 1,2,4,5-Tetrachlorobenzene	97.4	110	-12%	< 0.050	115
1,2,3,4-Tetrachlorobenzene	101	113	-11%	< 0.025	116
Pentachlorobenzene	88.3	99.7	-12%	< 0.025	110
Hexachlorobenzene	68.6	78.8	-14%	< 0.025	115

Appendix A

Chain of Custody Sheets for Samples

No. 012486 **	Turn Around (circle one) Normal Rush	Report Due:	Invoice To:
CHAIN OF CUSTODY			
ental Che g Service		Phone 608-221-8700 FAX 608-221-4889	Mail Report To:
			Project Number:

Phone 608-221-8700 FAX 608-221-4889	61	Report Due:	
Project Number:		Invoice To:	
UC Company:	WARTIN JSCHOLE	Company:	
520 59		Address:	
Sampled By (Print): No V (D D D I			
		P.O. No.: Quote No.:	
Collection	Analysis	21	Laboratory
Sample Description Date Time Matrix Bottles Presery*		Comments	Number
KEP-FB-012 786 1340 W 5 A	CB2/8260\$/DIOXANB)	W/699
42P-GW-002-005 28/2 1530		JOLIN WITH	2 33
KRP-GW-603-005 75 2020			oC) 01
1427-6W-004-005 Perch 1745			40C)W
KRD-Gw-005-w5 2806/405			£0€) W
KRP-64-006-005 366 1230			40C)W
KED-GW-007-005 ME6 1020			200101
KRP-64-008-005 23 E. 1140			90c/m
KBD-GD-009-003 "3c, 1915			70C1W
KEP-DUPLICATE 3E JN J			80C1W
*Preservation Code Relinquished By:	Date/Time: Received B/:		Date/Time:
A=None B=HCL C=H2SO4 Chanks 10. Mr. 16.	9/20/66 2030	N 20 SC 06	960%
D=HNO3 E=EnCore F=Methanol Relinquished By: G=NaOH O=Other(Indicate)	Date/Time: Received By:		Date/Time:
Custody Seal: Present/Absent Intact/Not Intact Seal #'s	Receipt Temp:		
Shipped Via:	Temp Blank Y	Z	
,	WHITE - REPORT COPY YELLOW - LABORATORY COPY	RY COPY PINK - SAMPLER/SUBMITTER	TFR

Appendix B

FEDEX shipping label for Paradigm Labs

Fed USA Airbill Tracking 83778414668
From Phase print and press hard. Date XISROS Sender's FedEx Account Number 224281991
SE RICHARD 10 HNSON Phone (608) 358-2175
Company & CCS
Address 25 15 AD VANCE RD
City MADISON State WZ ZIP 53718
Your Internal Billing Reference First 24 characters will appear on invoice.
To Recipient's SOE KUBACR Name SOE KUBACR Phone (608) 221-8700
Company ECCS INC
Address 25 25 AD VAWCR RD [6 "HOLD" at FedEx location, print FedEx address. We cannot deliver to P.D. boxes or P.D. ZIP codes.
Address
City MANKON State WZ 718 537 18

Questions? Visit our Web site at fedex.com or call 1.800.Go.FedEx® 800.463.3339.

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	FedEx 1Day Freight* Next business day	FedEx 2Da Second busine			3Day Freight
* Cell 1	for Confirmation:				
5	Packaging				Declared value limit \$500
	FedEx Envelope*		* «Smell Pek, FedEx I FedEx Sturdy Pek	Other	,
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	and agree to indemnify an	us to deliver this shipment of hold us harmless from at	ry resulting claims.	nature	446



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 North Carolina Maryland

Alaska
 Louisiana
 New Jersey
 West Virginia

Li 200 W. Potter Drive Anchorage, AK 99518 Tel: (907) 562-2343 Fax: (907) 561-5301 Li 5500 Business Drive Wilmington, NC 28405 Tel: (910) 356-1903 Fax: (910) 350-1557

☐ 1228 Greenbrier Street Charleston, WV 25311 Tel: (304) 346-0725 Fax: (304) 346-0761

White - Retained by Lab Yellow - Returned with Report Pink - Retained by Sampler

ABSENT

BROKEN

INTACT

Requested Turnaround Time and Special Instructions:

Samples Received Cold? (Circle) YES NO

Chain of Custody Seal: (Circle)

Special Deliverable Requirements:

Shipping Ticket No:

Shipping Carrier:

Received By:

Time

Date

Collected/Relinquished By:(1)

Received By

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N.

9/11/18

Received By:

Time

Date

Relinquished By: (3)

Received By:

Time

Date

Relinquished By: (4)

Temperature [C:

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