BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF	)	
	)	
PETITION OF BRICKYARD DISPOSAL	)	AS 13 - 4
& RECYCLING, INC.	)	
PURSUANT TO 35 Ill. Adm. Code	)	
814.402 (b)(3)	)	(Adjusted Standard-Land)
	)	

NOTICE OF FILING

PLEASE TAKE NOTICE that today I have filed with the Office of the Clerk of the Pollution Control Board the Petitioner's Amended Adjusted Standard Petition. Copies of these documents are hereby served upon you.

To: Pollution Control Board, Attn: Clerk
100 West Randolph Street
James R. Thompson Center, Suite 11-500
Chicago, Illinois 60601-3218

Kyle N. Davis, Esq.
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue, East
P.O. Box 19276
Springfield, Illinois 62794-9276

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, Illinois 62794-9274

Dated: October 9, 2013

Respectfully submitted,
BRICKYARD DISPOSAL & RECYCLING, INC.

By: /s/William D. Ingersoll
One of Its Attorneys

BROWN, HAY & STEPHENS, LLP
Claire A. Manning
William D. Ingersoll
cmanning@bhslaw.com
wingersoll@bhslaw.com
205 S. Fifth Street, Suite 700
P.O. Box 2459
Springfield, IL 62705-2459
(217) 544-8491

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AMENDED ADJUSTED STANDARD PETITION

NOW COMES Brickyard Disposal & Recycling, Inc. ("Brickyard" or "Petitioner"), by its attorneys Brown, Hay & Stephens, LLP, and amends its Adjusted Standard Petition filed on May 31, 2013, which requested the Illinois Pollution Control Board ("Board") to grant an adjusted standard pursuant to Section 28.1 of the Illinois Environmental Protection Act (the "Act") (415 ILCS 5/28.1) and, more specifically, Section 814.402(b)(3) of the Board's regulations (35 Ill. Adm. Code 814.402.(b)(3)).[1]

I. BACKGROUND

This Amended Petition is filed and submitted in response to the Board's Order of August 8, 2013, requesting Petitioner to provide more information. The Petitioner appreciates the Board's capable analysis of the Petition and the underlying regulatory scheme. The applicability of specified provisions in Part 811 to the various types of existing landfills as prescribed in Part 814, has proven to be complicated and the Board's request helped focus the Petitioner's analysis. Prior to the initial filing, the Petitioner had worked with the Illinois Environmental Protection Agency ("IEPA") for many months, specifically to identify the applicability of various

[1] Hereinafter, citations to Board regulations will be by Section number only – *e.g.,* Section 814.402(b)(3).

regulatory provisions that may be related to the requested Petition. This Amended Petition should now provide the clarity the Board needs to approve its request, as such request is deemed necessary for appropriate IEPA permitting for closure. The Petitioner's responses to the Board's requests are integrated into the text of the Amended Petition and a corresponding reference to the Board's numbered requests is provided in the footnotes. See also Attachment A.

The Petitioner is located in Vermilion County near Danville, Illinois, and provides waste disposal and recycling services to Vermilion County and the surrounding east-central Illinois region. The Petitioner's landfill facility consists of two separate waste units: Unit I ("Brickyard I") and Unit II ("Brickyard II"), separated by a haul road. Together, the units cover approximately 152 acres within a 293 acre site. The facility is located at 601 Brickyard Road, Danville, Illinois and has been assigned IEPA Bureau of Land I.D. #1838040029.

Brickyard II, to the north of Brickyard I, is still an operational landfill and is not relevant to this Amended Petition. Rather, this Amended Petition concerns Brickyard I, an "existing landfill" under the Board's landfill regulations. *See* 35 Ill. Adm. Code Part 814, Subpart D.

Brickyard I was initially permitted by the IEPA in 1981 (Log. No. 1981-24-DE). It is located in an area that had been disturbed by surface mining, primarily for coal and shale. Brickyard I ceased accepting waste in 1997, and initiated closure at that time. Brickyard I is considered an "existing landfill" under state landfill regulations as it pre-existed the newer federal Resource Conservation and Recovery Act ("RCRA") rules, commonly known as the "Subtitle D" rules. The Subtitle D rules have now been incorporated into state regulations.

Brickyard I is not directly subject to Subtitle D, but rather is regulated under 35 Ill. Adm. Code Part 814, Subpart D ("Subpart D") of the Board's regulations. The landfill has been in the closure process since 1997, pursuant to Subpart D. The Petitioner ultimately intends to seek final closure and post-closure care certification approvals from the IEPA and this adjusted standard is believed necessary to facilitate those approvals.

Specifically, Brickyard has been engaged in discussions with the IEPA concerning permitting required to achieve effective closure, and then to allow appropriate completion of post-closure care. As a result of discussions with the IEPA and the unique circumstances at this site, Petitioner determined (after consultation with the IEPA) to seek an adjusted standard. The IEPA supports the requested Adjusted Standard.[2]

During the landfill's operation, and therefore prior to 1997, railroad ties and other construction debris ("extraneous fill materials") were deposited and/or utilized in an area contiguous to the landfill and now provide stability and support for Brickyard I. As a result, any environmentally responsible final closure will require incorporation of this fill area. Incorporation of the fill area is believed to require an adjustment to the groundwater monitoring boundaries, as specifically allowed for via a Board adjusted standard, as provided for in Section 814.402(b).

Thus, in order to appropriately monitor a closed Brickyard I consistent with the regulations, but accommodate the extraneous materials that remain, by allowing them to remain in place, the Petitioner seeks an adjusted standard pursuant to Section 814.402(b)(3). Such regulatory adjustment will allow the parties to fashion a workable and responsible closure and post-closure care monitoring plan in the permit that allows for the unique circumstances present here. More specifically, such regulatory adjustment, as provided for in Section 814.401(b)(3), will allow for an alternative groundwater compliance boundary, identified by the Board in its

[2] As the requested adjusted standard has not materially changed, the Petitioners anticipate the IEPA will continue to support its request, as it did with the originally filed Adjusted Standard Petition. See IEPA Recommendation, filed on July 15, 2013.

adjusted standard order, as petitioned for here, which will then allow the parties to more effectively place groundwater monitoring wells in the context of IEPA permitting.

II. ADJUSTED STANDARD PETITION FACTORS

In Section 104.406 of its procedural rules, the Board has codified the statutory requirements generally necessary, *as applicable in context*, to justify the Board's grant of an adjusted standard. *See* 35 Ill. Adm. Code 104.406. Following is a discussion of those factors, as related to this Amended Petition.

The Board's authorization to grant adjusted standards is found at Section 28.1 of the Act. Specifically, Section 28.1 provides that "[a]fter adopting a regulation of general applicability, the Board may grant, in a subsequent adjudicatory determination, an adjusted standard for persons who can justify such an adjustment consistent with subsection (a) of Section 27 of this Act." 415 ILCS 5/28.1.

The Board can do so in one of two ways. First, the Board may grant an adjusted standard pursuant to Section 28.1(b) of the Act by providing for a specific adjusted standard in a rule of general applicability. 415 ILCS 5/28.1(b) ("In adopting a rule of general applicability, the Board may specify the level of justification required of a petitioner for an adjusted standard consistent with this Section."). Second, the Board may grant an adjusted standard pursuant to certain factors listed in Section 28.1(c) of the Act. 415 ILCS 5/28.1(c) ("If a regulation of general applicability does not specify a level of justification required of a petitioner to qualify for an adjusted standard, the Board may grant individual adjusted standards whenever the Board determines, upon adequate proof by petitioner, that [specific factors are met].")

Here, Section 28.1(b) applies as the adjusted standard the Petitioner seeks is specifically provided for in Section 814.402(b)(3) of the Board's landfill regulations. Section 814.402(b)(3) allows the Board, via an adjusted standard, *to provide for a groundwater compliance zone different than that provided for in the general landfill regulations ("alternative groundwater compliance zone").* Emphasis added. An alternative groundwater compliance zone is believed necessary here due to unique circumstances present in order for the landfill to achieve responsible final closure. The Petitioner provided the IEPA with a draft of this Petition several months before filing and the IEPA is believed to have no objections to the Board's granting of this adjusted standard. The Petitioner believes that this adjusted standard can be granted pursuant to Section 814.402(b)(3), which allows for an adjusted standard applicable to Brickyard Unit I as it relates to groundwater.

A. Adjusted Standard Sought Pursuant to Section 814.402(b)(3)

Section 104.406(a) requires "[a] statement describing the standard from which an adjusted standard is sought. This must include the Illinois Administrative Code citation to the regulation of general applicability imposing the standard as well as the effective date of that regulation."

The Petitioner seeks an adjusted standard to move its "compliance boundary" outward so that it is beyond the areas of extraneous materials. Such movement of an otherwise applicable compliance boundary is appropriate via adjusted standard, pursuant to Section 814.402(b)(3). The Petition supports adjusted standard relief from Section 811.318(b)(3), which relates to the location of monitoring wells. *See* 35 Ill. Adm. Code 811.318(b)(3). These provisions were adopted in R88-7 at 14 Ill. Reg. 15861, effective September 18, 1990.[3]

B. Federal Rules Not Implicated

Section 104.406(b) requires "[a] statement that indicates whether the regulation of general applicability was promulgated to implement, in whole or in part, the requirements of the

[3] Responsive to Board information request number 1.

CWA (33 USC §§ 1251 *et. seq.*), Safe Drinking Water Act (42 USC §§ 300(f) *et seq.*), Comprehensive Environmental Response, Compensation and Liability Act (42 USC §§ 9601 *et seq.*), CAA (42 USC §§ 7401 *et seq.*), or the State programs concerning RCRA, UIC, or NPDES." 35 Ill. Adm. Code 104.406(b).

As discussed above, the Board's Part 811 landfill regulations fully implement the federal regulations concerning landfills, as required by the federal RCRA. The Part 814 regulations provide the segue between the regulations applicable to landfills that existed prior to the effective date of the new federal Subtitle D rules, such as Brickyard I, and to landfills subject to RCRA Subtitle D, such as Brickyard II. The relief requested in this Amended Petition will simply facilitate final closure of an existing (pre-Subtitle D) landfill; the Amended Petition does not seek relief to construct or operate any new unit. Thus, the newer federally required Subtitle D landfill requirements are not implicated.

C. Necessary Level of Justification is Provided for in Section 814.402(b)(3)

Section 104.406(c) requires the Petitioner to discuss "the information or requirements necessary for an adjusted standard as specified by the regulation of general applicability or a statement that the regulation of general applicability does not specify a level of justification or other requirements." 35 Ill. Adm. Code 104.406(c).

The Petitioner believes that the adjusted standard contemplated here is substantially provided for in the Board's relevant landfill regulation. Specifically, Section 814.402(b)(3) provides for its own level of justification as follows:

> The Board may provide for a zone of attenuation and adjust the compliance boundary in accordance with Section 28.1 of the Act and the procedures of 35 Ill. Adm. Code 106.Subpart G[4] upon petition demonstration by the owner or operator that the alternative

[4] This regulatory reference appears to be a reference to the adjusted standard procedures as numbered prior to the Board's revision of its procedural rules in 2000. *See In the Matter of the Board's Revision of Procedural Rules*, R2000-20.

compliance boundary will not result in contamination of groundwater which may be needed or used for human consumption. In reviewing such petitions, the Board will consider the following factors:

A) The hydrogeological characteristics of the unit and surrounding land, including any natural attenuation and dilution characteristics of the aquifer;
B) The volume and physical and chemical characteristics of the leachate;
C) The quantity, quality, and direction of flow of groundwater underlying the facility;
D) The proximity and withdrawal rates of groundwater users;
E) The availability of alternative drinking water supplies;
F) The existing quality of the groundwater, including other sources of contamination and their cumulative impacts on the groundwater;
G) Public health, safety, and welfare effects;
H) In no case shall the zone of compliance extend beyond the facility property line or beyond the annual high water mark of any navigable surface water; and,
I) Notwithstanding the limitations of subsection 814.402(b)(3)(H), in no case shall the zone of compliance at an existing MSWLF unit extend beyond 150 meters from the edge of the unit.

35 Ill. Adm. Code 814.402(b)(3).

These factors were developed by the Board to address the transition between the old and new landfill rules, which was an issue of immediate importance at the time of adoption. These factors are also relevant to the adjusted standard sought here, as further explained below. Each of the factors listed in Section 814.402(b)(3) is addressed in summary fashion in this petition at Section I. H below. The Section 814.402(b)(3) factors are also addressed in detail in a Technical Support Document, prepared by Andrews Engineering, Inc. ("AEI"), which was attached to the original Adjusted Standard Petition and is fully incorporated herein. See Adj. Stan. Pet., Exhibit B (referred to herein as "Technical Support Document").

D. Petitioner's Activity is a Pre-Subtitle D Landfill Seeking Closure

Section 104.406(d) requires the Petitioner to present "[a] description of the nature of the petitioner's activity that is the subject of the proposed adjusted standard. The description must include the location of, and area affected by, the petitioner's activity. This description must also include the number of persons employed by the petitioner's facility at issue, age of that facility, relevant pollution control equipment already in use, and the qualitative and quantitative description of the nature of emissions, discharges or releases currently generated by the petitioner's activity." 35 Ill. Adm. Code 104.406(d).

As discussed in the introduction and in greater detail the Technical Support Document, the Petitioner operates a municipal landfill and recycling center, located in Danville, Illinois, for Vermilion County (with a population of approximately 81,000) and the immediate surrounding areas. While Brickyard II is still open,[5] Brickyard I is no longer operational and has not accepted waste since 1997.

Brickyard I was first permitted in 1981. Brickyard I accepted its last load of waste in 1997, and initiated closure at that time pursuant to Part 814, Subpart D. The fill area contiguous to Brickyard I pre-existed the initiation of closure and the onset of the federal Subtitle D rules. No waste has been accepted at Brickyard I and no fill has been placed in the contiguous area since 1997.

Brickyard employs eight full-time employees at the facility located at 601 Brickyard Road. Temporary personnel are hired on an as-needed basis. Outside contractor personnel also regularly work at the site, including: construction (15 persons); work on synthetic liner (12 persons); quality control, inspection and sampling (4 persons); surveyor (1 person); and, gas to energy plant (2 persons). Republic Services employs additional personnel at its offices located at 180 S. Henning Road in Danville, including truck drivers (20 persons), maintenance personnel (6 persons), and those related to local and regional business operations, such as management and

[5] Brickyard II was developed after the new federal landfill rules and, accordingly, is a Subtitle D landfill. Brickyard II achieved local siting from Vermilion County in 1992, pursuant to Section 39.2 of the Act. 415 ILCS 5/39.2.

support staff (8 persons). Brickyard thus estimates the total number of persons involved in activities at the landfill to be 70 in any given year.[6]

The relevant pollution control equipment already in use at Unit I includes both gas and leachate extraction systems. The gas extraction system includes 42 vertical extraction wells within Unit I and seven additional vertical gas extraction wells on the periphery of Unit I. Vacuum lines extend to well headers at each location and tie in to the conveyance line that encircles the unit (inside the waste boundary). The conveyance line runs to the main flare unit and gas-to-energy plant located east of Unit II. Liquid collected in the condensate sumps is conveyed to the leachate storage tank, also located east of Unit II. Extraction well and conveyance line locations, with respect to Unit I, were provided on Figures 4 and 6 of the Technical Support Document.

Pursuant to Section 814.402(3), Unit I is not required to incorporate the leachate drainage and collection system. However, leachate is extracted from three manholes (L101, L103, and L104) which are centrally located within Unit I, and discharges to the conveyance line which runs to the leachate storage tank east of Unit II. Level sensors discharge liquid from the storage tank via force main to the treatment facility owned by the City of Danville, Illinois. The treatment facility is located directly adjacent to, and east of, the Brickyard facility as shown on Figure 1 to the Technical Support Document.[7]

The emissions, discharges and releases from Brickyard activities may be qualitatively and quantitatively described as:[8]

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[6] Responsive to Board information request number 2.
[7] Responsive to Board information request number 3.
[8] Responsive to Board information request number 4.

Gas

Gas emissions at the Brickyard facility[9] occur from two separately permitted entities; Brickyard Disposal and Recycling, Inc. (facility ID No. 183020AIF) and Brickyard Energy Partners, LLC (facility ID No. 183020AIJ). Emissions from Brickyard Disposal and Recycling, Inc. are limited to operations pertaining to the roadways, the fugitive landfill emissions, and the tub grinder. Emissions from operations pertaining to Brickyard Energy Partners, LLC include the flare station and gas-to-energy plant. The qualitative and quantitative nature of the gas emissions were obtained from the 2012 Annual Emission Report filed pursuant to Title V CAAPP Permit No. 9810021 and from the owner/operator of the gas-to-energy plant and flare station (Brickyard Energy Partners, LLC) (CAAPP Application No. 00080067).

The following parameters and reported emissions occurred at the facility during 2012:

Constituent	Brickyard Disposal and Recycling, Inc.	Brickyard Energy Partners, LLC.
Carbon Monoxide	0.55	89.32
Carbon Dioxide	3996.50	22592.00
Methane	1426.00	2.29
Nitrogen Oxides	2.55	49.39
Particulate Matter	7.66	5.05
Sulfur Dioxide	0.17	2.12
Volatile Organic Material	1.15	7.35

Units in Tons

The reported emissions have been below the allowable emissions for each entity.

Brickyard Disposal and Recycling, Inc. manages its emissions by watering the roadways to minimize dust (particulate matter), applying other dust control measures, ensuring proper cover is in place on the refuse to minimize fugitive emissions, working with Brickyard Energy

[9] Note that the emissions are reported here as from the entire Brickyard facility and not just Unit I, the subject of this matter.

Partners, LLC to ensure the gas extraction wells are properly adjusted and maintained, and properly maintaining the internal combustion engine and exhaust system for the tub grinder to ensure maximum combustion of the fuel occurs. Brickyard Energy Partners, LLC, through a contractor, adjusts the gas extraction wells to maximize gas recovery from Unit I and Unit II, provides maintenance as necessary to the extraction wells and conveyance lines, and maintains the flare unit and gas-to-energy engines to ensure proper combustion/destruction of the landfill gas.

Leachate

As discussed previously, leachate is extracted from three manholes (L101, L103, and L104) which are centrally located within Unit I. Unit I is inspected on a routine basis pursuant to the closure plan, and on a regular basis due to gas system adjustments, gas probe monitoring, and groundwater monitoring activities. Any observed release, such as a seep, would be repaired immediately. However, due to the existing cover and current leachate extraction, no visual observation of a release has occurred. Therefore, the only mechanism available to monitor for a release is through the groundwater monitoring program. There is no accurate way to quantify the volume of leachate that may migrate through a low hydraulic conductivity media to the monitored zones adjacent to Unit I. Calculation for an approximated volume of leachate for Unit I was presented in Section 4.2.1 of the Technical Support Document. However, unless there is a driving force, such as a pressure gradient, causing the leachate to move, diffusion is the only process by which contaminants could migrate, which is comparatively negligible to advection.

The Unit I monitor well network consists of 33 wells that are tested quarterly and/or semiannually and compared to interwell and/or intrawell background concentrations, and/or the appropriate Part 620 class standards for groundwater. A leachate release should become apparent due to changing groundwater characteristics, typically resulting in increasing concentration trends or multiple exceedences of indicator parameters. However, determination of a potential source has been complicated by past facility activities, including coal and brick mining operations, and by the placement of extraneous materials along the periphery of the waste unit. Thus, Petitioners seek an alternative groundwater monitoring compliance boundary so that any impacts, whether from the landfill itself or from the area of extraneous material outside the landfill cell, are properly monitored and accounted for.

Comprehensive leachate analyses have occurred as required by Condition Nos. VII.4 and VII.5 of Brickyard's current permit. The Unit I leachate concentrations were compared to the average concentrations expected for a municipal solid waste disposal facility as listed in Attachment 1 to Appendix C to LPC-PA2[10]. Typically, leachate concentrations were significantly less than the values listed in the subject Attachment (Section 4.2.2 of the Technical Support Document). A potential release is difficult to confirm given the lower source concentrations. Two of the indicator parameters (chloride and sulfate) are relatively low for the environment (former mining area) and have no groundwater standard pursuant to Section 620.440. Boron is also prevalent in the groundwater, but is present in similar concentrations in upgradient and downgradient wells. There are no current inorganic parameter concentrations that indicate a leachate release.

Volatile organic parameters can also be an indication of a leachate release. The leachate concentrations presented in Attachment 5 of the Technical Support Document show the presence of several volatile organic parameters, including 1,3,5-trimethylbenzene, benzene,

[10] LPC-PA2 is an IEPA permit application form, with its Appendix C being "Instructions for the Groundwater Protection Evaluation for Putrescible and Chemical Waste Landfills" and Appendix C, Attachment 1 is "Chemical Parameters Associated with Putrescible and Chemical Landfills." Appendix C may be found at: http://www.epa.state.il.us/land/regulatory-programs/permits-and-management/forms/appendix-c.pdf.

chlorobenzene, cis-1,2-dichloroethene, ethylbenzene, xylenes, tetrahydrofuran, and toluene, typically in manhole L102. Tetrahydofuran has been detected in well T114 three times since becoming active the second quarter 2010. One such detection occurred the second quarter of 2013. However, the parameter was never confirmed because it was not detected during the following sampling event. Cis-1,2-dichloroethene has been detected in well A126 slightly above the practical quantitation limit of 5.0 ug/L for the last several quarters. Detection of the parameter has been attributed to gas migration. A groundwater management zone was implemented pursuant to Application Log No. 2000-403 to address limited volatile organic compound detections (dichlorodifluoromethane and 1,1-dichloroethane) as a result of gas migration. An evaluation of remedial activities is submitted to the IEPA on an annual basis. The most recent evaluation stated dichlorodifluoromethane and 1,1-dichloroethane were not detected during the 2012 review period, indicating the remedial activities were effective to control potential gas migration from Unit I.

Given the site history and hydrogeologic characteristics, a leachate release cannot be quantified, and confirmation can be difficult. The facility minimizes the potential for a leachate release by maintaining the cover; promoting drainage by augmenting low areas to negate ponded water on the cover, thereby minimizing precipitation infiltration to the waste; adjusting the gas extraction well field to ensure effective removal of landfill gas; and maintaining all monitoring devices. In the event of a confirmed a release, the facility will permit and implement appropriate corrective action to effectively protect the environment. Potential remedial activities are environment dependent and cannot be pre-determined.

Specifically, this adjusted standard will allow the facility to monitor outside the area where extraneous fill materials have been deposited, so that potential impacts from either the landfill unit or the contiguous fill area will be considered and understood and, if necessary, remediated. The adjusted standard is a necessary and appropriate means of dealing with the fill material because removal is not an environmentally sound or economically viable option. *See* Technical Support Document, at Section 4.7, Sections 4.7.1-4.7.6 and Section 5.3. This historic fill area provides support to and stabilization of the existing landfill such that the area, in essence, provides a partial but essential framework for the existing landfill. Accordingly, environmentally responsible final closure needs to incorporate this area into final closure and post-closure care permitting. As the regulations do not squarely contemplate this scenario, this adjusted standard is believed necessary.

As part of the closure process for Brickyard I, the Petitioner developed an assessment monitoring plan (Application Log Nos. 2004-098 and 2005-036) pursuant to Permit Condition VIII.A. 15. The application was approved by the IEPA on April 29, 2005, and temporary assessment monitoring wells (T106, T107 and T108) were installed. During the installation of these temporary wells, the contractors investigated extraneous materials used as fill outside the permitted boundary of the landfill, but within the facility grounds and located in the area directly under the otherwise appropriate area for the location of the monitoring wells. Due to concerns related to locating the temporary assessment wells directly through the fill materials, additional investigations were proposed by the Petitioner, approved by the IEPA and implemented by AEI on behalf of the Petitioner. *See* Technical Support Document, at Section 3.

Extensive investigations were conducted in the area bordering Brickyard I, both in July and August of 2006, and again in the fall of 2008. As part of the 2006 testing, 13 test pits were completed along the northeast boundary of Brickyard I. The test pits were conducted in sequence, chasing the extraneous fill material, or spot-checks verifying previous information.

The results of the 2006 investigation indicated that the fill material was sporadic, but present more consistently west of the eastern haul road, and within the area appropriately designated the Groundwater Management Zone ("GMZ"). After discussions with IEPA, an additional field investigation was conducted during August and September of 2008, which included 59 additional test pits along the perimeter of Brickyard I. The results of this investigation were included as part of Application Log. Nos. 2006-013, 2006-334, and 2009-089. The investigation revealed that the material was primarily broken and shredded railroad ties, with minor amounts of construction and demolition debris, such as scrap metal mixed with soil.

These investigation results are consistent with historical documents discovered in IEPA files. For example, in December of 1986, Charles Clark, from Clark Engineering Services, wrote a letter to Glen Savage of IEPA which explained:

> [These extraneous materials] presently exceed the boundary of the permitted area along the north slope . . . as it is not practical to remove the filled material, and since the company has received an administrative citation for the incursion . . . no corrective action is proposed.

In addition, investigation and IEPA files provide that the fill material covers approximately 18 acres in three different areas, generally contiguous to Brickyard I. Further, investigation and IEPA files state that the material was not continuously deposited, but exists in pockets. The entire area around Brickyard I has been historically utilized (and the land disturbed) by surface mining, either for shale, coal, or both.

E. Efforts Necessary to Comply with Regulation of General Applicability

Section 104.406(e) requires the petition to provide: "a description of the efforts that would be necessary if the Petitioner was to comply with the regulation of general applicability. All compliance alternatives, with the corresponding costs for each alternative, must be discussed.

The discussion of costs must include the overall capital costs as well as the annualized capital and operating costs." 35 Ill. Adm. Code 104.406(e).

Here, Section 814.402(b)(3) directly provides for the adjusted standard the Petitioner seeks. Thus, a discussion of compliance alternatives that would be necessary to justify an alternative to a rule of general applicability is not directly relevant here. Nonetheless, the Petitioner sets forth the following rationale, as related to the context of the Brickyard I situation.

Compliance with the rule of general applicability, without invoking the groundwater compliance adjustment allowed for in Section 814.402(b)(3), would require the Petitioner to monitor directly through the extraneous fill material buried outside the landfill cell. This is problematic, of course, as potential groundwater impacts from the landfill are not capable of accurate assessment because any potential impact can be related to the buried material, as opposed to the landfill. Nonetheless, the Petitioner recognizes that, no matter what the source of any impact (the landfill or the buried material outside the landfill), the Petitioner is responsible for such impact, as the owner of the entire landfill area. Thus, from an environmental perspective, the Petitioner and the IEPA agree that monitoring outside this area is appropriate, as monitoring will then be able to ascertain *any* impact, whether it be from the landfill or from the buried materials.

The only other alternative discussed and considered was removal of the material that was historically placed outside the landfill. It is estimated that monetary costs for doing so would be considerable. However, the costs of removal are not discussed in this Amended Petition[11] because this alternative must be rejected due to its infeasibility and potential adverse environmental impact. Removal would jeopardize the stability of the existing landfill such that

[11] Instead, see discussion at Section I.G of this Amended Petition.

the minimum safety factors under the Board's Part 811 rules could not be met. *See* 35 Ill. Adm. Code 811.304(d). Removal of the buried materials would require removal of much of the existing cover and interruption of the gas extraction system – creating both safety and nuisance concerns. It would require dewatering which could promote mine void collapse, liner fatigue and possible failure, and other potentially serious problems. *See* Technical Support Document, specifically at Section 4.7.4 and Section 5.3.

For these reasons, the Petitioner and IEPA agree that a simple solution to achieve the permitting necessary for effective closure and post-closure care monitoring, consistent with the spirit of the landfill regulations, is to invoke the procedure the Board has set forth in Section 814.402(b)(3).

F. Proposed Adjusted Standard

Section 104.402(f) requires "[a] narrative description of the proposed adjusted standard as well as proposed language for a Board order that would impose the standard. Efforts necessary to achieve this proposed standard and the corresponding costs must also be presented." 35 Ill. Adm. Code 104.402(f).

The Petitioner has attached a proposed Board order, setting forth the language proposed to be utilized in granting the adjusted standard. *See* Exhibit A. The Petitioner has made revisions consistent with this Amended Petition and responsive to the Board's August 8, 2013 Order. The Petitioner believes the IEPA to be supportive of the revised version.[12] The proposed adjusted standard (the Board adjustment of the compliance boundary) can be incorporated into the Petitioner's permit, subsequent to a Board order allowing for such.

As stated in Section 2 of the Technical Support Document, the proposed routine monitor wells were located as close to the limits of the extraneous materials as possible given the

[12] Responsive to Board information requests numbers 10, 15 and 16.

topographic constraints (extreme topographic relief or the presence of surface water). The existing topography is presented in Figures 7REV and 9REV (Figures attached hereto as Exhibit B). The anticipated well locations were shown in Figures 7 and 9 of the Technical Support Document along with the proposed compliance boundary. However, it is understood that each of the proposed locations would require justification to the IEPA in the form of a permit application. Because of site access issues, and the fact the actual well locations must be approved yet, via permitting, the proposed compliance boundary was located beyond the subject well locations to account for potential relocation of wells. The hydrogeologic conditions must also be considered where the monitorable water-bearing zone may be dry, requiring adjustment to a specific well location. Locating the compliance boundary too close to the perimeter of the proposed well network may restrict future adjustments to the network. However, the proposed compliance boundary has been revised as shown in Figure 7REV and Figure 9REV; the proposed compliance boundary has been moved closer to the monitor wells anticipated for the monitor well network subsequent to IEPA approval. Figure 7REV also identifies the distance the revised proposed compliance boundary is from the waste unit boundary, and illustrates how far the subject boundary was moved (closer to the wells) as compared to the initial submittal. The monitor well spacing will be verified via IEPA permit application subsequent to the approval of the adjusted standard. Ample distance should be available between any new well and the compliance boundary to account for access issues.[13]

Section 814.402(b)(3) dictates the location of the monitor wells by defining the compliance boundary. The zone of attenuation or edge of the zone of attenuation as referenced in Section 811.318(b)(5) does not appear applicable. Pursuant to Section 814.402(b)(3), the Board may provide for a zone of attenuation and adjust the compliance boundary as part of an

[13] Responsive to Board information request number 5.

adjusted standard. However, a zone of attenuation does not currently exist at Unit I and has not been requested because it is a Subpart D landfill. Additionally, the placement of at least one well at the edge of the zone of attenuation is typically referred to as a compliance boundary well. The location of a compliance boundary well will be dependent upon where the compliance boundary is located. This is the specific determination Petitioner seeks from the Board in this adjusted standard matter. Temporary well T110 is slightly outside the 150 meter limit for the compliance boundary, so the exact location of a well in that area will be determined through permit application and will be within the compliance boundary proposed herein. Based upon the additional analysis the Petitioner has done to respond to the Board's August 8, 2013 information requests, there is no longer any request for relief from Section 811.318(b)(5). Given that no relief is now being requested from Section 811.318(b)(5), the Petitioner believes that background concentrations used to evaluate the groundwater quality data have been and will continue to be statistically derived pursuant to Section 811.320(e) and no such relief is requested.[14]

The Petitioner has also given additional analysis to the issue of applicability of Section 811.320(c) in response to the Board's information requests. As stated above, Section 814.402(b)(3) dictates the location of the monitor wells by defining the compliance boundary. The zone of attenuation or edge of the zone of attenuation as referenced in Section 811.318(b)(5) does not appear applicable, nor does Section 811.320(c). Pursuant to Section 814.402(b)(3), the Board may provide for a zone of attenuation and adjust the compliance boundary as part of an adjusted standard. However, a zone of attenuation does not currently exist at Unit I and is no longer requested. Instead, a simple adjustment of the location of the compliance boundary pursuant to Section 814.402(b)(3) is requested.[15]

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[14] Responsive to Board information requests numbers 6, 7 and 8.
[15] Responsive to Board information request number 9.

The original draft of the Proposed Board Order (Exhibit A to the Adj. Std. Pet.) references a "temporary Applicable Groundwater Quality Standard," which raised an issue with the Board regarding whether relief was being sought from the Part 302 water quality standards. The Petitioner is not requesting an adjusted standard from the 35 Ill. Adm. Code 302 numeric water quality standards that are applicable pursuant to Section 814.402(b)(3). The usage of "temporary Applicable Groundwater Quality Standard" contained in the Proposed Board Order, Condition 1, intends to denote that the current background concentrations used to evaluate the groundwater quality from the temporary "T" wells would be used until such time the IEPA approves revisions to the background concentrations via a permit modification, if and when necessary.[16]

The migration pathway for Unit I has been identified as the coal seam, the mine void where the coal has been removed via underground mining, or the spoil/bedrock interface where surface mining has occurred. Because of this, the groundwater quality within this pathway exhibits significant spatial variability. Depending upon the horizontal location of the well, intrawell background concentrations may be necessary. The wording defined above was utilized to ensure that the Board Order does not mandate specific numerical standards for the wells at the compliance boundary, but, rather, allows the IEPA to approve revisions as deemed appropriate.

The Petitioner is requesting an adjusted standard from the definition of "compliance boundary" as presented in Section 814.402(b)(3). Specifically, the adjusted standard is sought for the statement ". . . the compliance boundary, defined as any point on the edge of the unit . . . ." Pursuant to Section 814.402(b)(3), "[t]he Board may provide for a zone of attenuation and adjust the compliance boundary in accordance with Section 28.1 of the Act and the procedures of 35 Ill. Adm. Code 106.Subpart G upon petition demonstration by the owner or operator that the

[16] Responsive to Board information request number 11.

alternative compliance boundary will not result in contamination of groundwater which may be needed or used for human consumption." The Petitioner requests an alternative compliance boundary as shown in Figures 7REV and 9REV (Exhibit B). The requested revision complies with Sections 814.402(b)(3)(H) and 814.402(b)(3)(I). Thus, an alternative definition of "compliance boundary" for Brickyard I could be any point *beyond the edge of the waste unit, and extraneous materials that may impact the ability of the monitor well network to allow adequate evaluation of potential sources of discharge to the groundwater*.[17] The Petitioner is not requesting an adjusted standard from the definition of "zone of attenuation," since as mentioned above, Brickyard I is a Subpart D landfill, to which a zone of attenuation does not apply.[18]

The extraneous materials have existed at the current locations in excess of 25 years and are not mobile. "Institutional controls" in this situation would be two containment measures: physical cover and groundwater monitoring.

Cover

As stated in the Technical Support Document and the Extraneous Material Cover Plan ("Cover Plan") (Exhibit C to the Adj. Std. Pet.), multiple investigations were conducted to evaluate the thickness and characteristics of the existing cover overlying the extraneous materials. Cover located over known areas containing extraneous materials ranged in thickness from 1.5 feet to 11.0 feet, with an average thickness for the investigation of 6.9 feet. Physical testing of the existing cover conducted during several investigations indicated the cover on the extraneous materials has performed beyond expectations and appears to perform better than typical clay cover for Part 814, Subpart C facilities.

[17] Responsive to Board information request number 12.
[18] Responsive to Board information request number 13.

The Cover Plan provides specifications for additional cover placement over a small area that does not contain the minimum two feet of low permeable material.

Groundwater Monitoring

The monitor well network proposed in Figure 9REV has been designed to monitor the groundwater quality beyond the Unit I waste boundary and the extraneous materials. Any negative influence to the groundwater quality caused by the extraneous materials will be detected by the monitoring network. Assessment of any negative changes in groundwater quality, and implementation of corrective measures, will be conducted pursuant to the applicable regulations and permit conditions.[19] Only two small areas adjacent to the waste unit do not contain documented extraneous materials. One area is located hydraulically upgradient to the unit (west), and an area exists south of the unit between wells R127 and T118. As shown in Figures 3, 4, 7 and 9 of the Technical Support Document, the areas containing extraneous materials upgradient to Unit I are limited. As stated previously, because groundwater movement is from west to east, monitor wells located outside the subject materials should be representative of background conditions, unaffected by the waste unit or extraneous materials. The placement of the compliance boundary is not as critical upgradient of the waste unit. However, the location of the compliance boundary south of Unit I near T104, T119, T103, T118, and T117 (west to east) is significant because it is downgradient of the waste unit, extraneous materials, and disturbed soils. Borings and cover probes conducted in the area between R127 and T118 indicated all unconsolidated materials to be disturbed from the waste boundary to the drainage way to the south. Although no extraneous materials were encountered, the disturbed nature of the backfill negatively influences the groundwater quality when compared to the current background concentrations. For this reason, the compliance boundary is proposed south and directly adjacent

[19] Responsive to Board information request number 14.

to the drainage feature, which is well within the 150 meter maximum limit. This will allow for adequate monitoring of groundwater quality outside the waste unit and disturbed deposits. The southern edge of the extraneous materials and disturbed deposits comprise the north slope of the drainage area along the south perimeter of Unit I. Little area exists for wells to be installed north of the drainage structure. All but one of the "T" wells (T118) have been installed across the drainage structure. Therefore, locating the compliance boundary on the outside of the drainage structure between wells R127 and T118 is consistent with the remainder of the site.[20]

The Petitioner has developed cost estimates for oversight ($65,213.00) and implementation ($479,473.33) of the Cover Plan and said cost estimates are shown in the tables seen in Exhibit C, attached hereto. The estimates provided include costs for a third party contractor to perform construction services at the Brickyard facility. Construction services provided by the contractor include the following activities: clearing and grubbing; placement of additional compacted cover soils and sidewall berms; placement of topsoil; and vegetation establishment over the disturbed areas (including mulch, seed, fertilizer and turf reinforcement mat over the sidewall berms). Additional costs have been included for permitting and construction quality control by a registered professional engineer. Completion time for the project would include the actual construction time, any permitting as may be necessary, and possible delays caused by inclement weather (ideal construction season to begin this project is the spring of 2014). The Petitioner, in the Proposed Board Order (Exhibit A), has therefore recommended a 12-month completion requirement for the project. This should be adequate for the activities described and accounting for any delays such as weather.[21]

G. Quantitative and Qualitative Environmental Impact of Compliance with Existing Regulations versus Adjusted Standard (35 Ill. Adm. Code 104.406(g))

[20] Responsive to Board information request number 24.
[21] Responsive to Board information request number 17.

Section 104.406(g) requires a discussion of "[t]he quantitative and qualitative description of the impact of the petitioner's activity on the environment if the petitioner were to comply only with the proposed adjusted standard. To the extent applicable, cross-media impacts must be discussed. Also, the petitioner must compare the qualitative and quantitative nature of emissions, discharges or releases that would be expected from compliance with the regulation of general applicability as opposed to that which would be expected from compliance with the proposed adjusted standard." 35 Ill. Adm. Code 104.406(g).

In promulgating the specific adjusted standard provided for in Section 814.402(b)(3) of the Board's landfill regulations, the Board has, in large part, already accounted for the above considerations. For example, the justification required in Section 814.402(b)(3) requires, among other things, consideration of hydrogeological characteristics, surrounding land, geologic considerations, leachate considerations, groundwater flow considerations, and proximity of groundwater users. These are the very criteria which obviously motivated the Board to require a discussion of environmental impact in a petition, as provided in Section 104.406(g) of its procedural rules. Thus, the Petitioner's discussion of the Section 814.402(b)(3) factors also addresses the considerations that would be important to the Board pursuant to Section 104.406(g) of its procedural rules. Nonetheless, the Petitioner presents the following for the Board's consideration.

1. Lack of Interference with Current Beneficial Use of Ground Water

For the reasons set forth in the Technical Support Document, as summarized in Section I. H of this Amended Petition, the adjustment of Brickyard I's groundwater compliance boundary as contemplated in Section 814.402(b)(3) will not interfere with anyone's beneficial use of groundwater.

2. Economic and Social Necessity

As a more general matter, this adjusted standard is believed necessary in order to facilitate final closure of Brickyard I in a manner consistent with relevant landfill regulations, while allowing the railroad ties and other extraneous fill materials to remain in place. Removal of this material is not warranted environmentally and, in fact, removal will jeopardize the stability of the existing landfill and will pose more problematic risks than those involved with allowing it to remain in place. These items are discussed in greater detail in the Technical Support Document, specifically at Sections 4.7, 4.7.1-4.7.6, and 5.3, but are summarized and reiterated here.

First, because of its location around the landfill, removal could create slope stability problems for Brickyard I, threatening the structural integrity of the landfill. Second, the fill area is generally capped with clean soil and vegetation, which need not be disturbed. Third, the removal of the debris would put the Petitioner's employees and the environment at an increased risk of exposure by the excavation, which could jeopardize the contiguous landfill's integrity, potentially causing unnecessary and unwarranted exposure routes. Considering the elevated risks of extraction, the most protective approach for dealing with this historic deposition is to leave it in place, add protections, and continue to monitor it as the landfill is being monitored. However, this responsible solution is believed to require the adjustment provided for via the adjusted standard in Section 814.402(b)(3).

The proposed adjusted standard is both environmentally protective and economically feasible. Brickyard I has and will continue to use safe and appropriate institutional controls to contain the extraneous materials in the existing locations. The adjusted standard will facilitate the installation of a monitor well network beyond the limits of the extraneous fill area and allow monitoring of the groundwater quality that may be influenced by Brickyard I and/or the extraneous materials. Currently, as required by the IEPA, the routine monitoring wells are located along the perimeter of Brickyard I. However, most of the wells are located in areas that contain extraneous material. For this reason alone, the current routine wells cannot effectively monitor surrounding potential groundwater impacts from the landfill and area surrounding it.

As set forth in more detail in the Technical Support Document, twelve assessment wells have already been installed to the east, south and west of the extraneous fill areas and are currently monitoring any potential impact to surrounding groundwater.

3. All Technically Feasible and Economically Reasonable Methods Are Being Used to Prevent the Degradation of the Groundwater Quality

The proposed adjusted standard will not adversely impact groundwater quality but, instead, will achieve a greater degree of protection because monitoring within the compromised area will not achieve accurate results and removal of the material from the compromised area may lead to more serious problems, including possible adverse groundwater impact. *See* Technical Support Document, at Section 4, Sections 4.7.1-4.7.6 and Section 5.

Responding to comments from IEPA, AEI performed additional investigation of the existing cover overlying areas with the extraneous materials in October and November 2012. The report of that investigation may be found in Exhibit C, "Extraneous Materials Cover Plan." The investigation showed that the vast majority of the areas with extraneous materials had considerable cover with very low hydraulic conductivity. In addition, the Cover Plan includes plans for Brickyard to ensure that all areas with less than two feet of protective cover will be augmented to contain at least two feet of protective cover and six inches of a vegetative layer.[22]

[22] *See* "Extraneous Materials Cover Plan, Exhibit C to the Adj. Std. Pet., at p. 6. The work will be certified by a Professional Engineer as being completed consistent with the Plan. Brickyard expects such completion to occur within one year from the adjusted standard order requested herein.

H. Justification of Proposed Adjusted Standard

Section 104.406(h) requires that the Petitioner explain how it "seeks to justify, pursuant to the applicable level of justification, the proposed adjusted standard." 35 Ill. Adm. Code 104.406(h).

The Petitioner has engaged the services of AEI, who performs substantial engineering and other technical work at both Brickyard I and II, to prepare a Technical Support Document justifying this adjusted standard consistent with the Board's requirements found at Section 814.402(b)(3). As stated above, that Technical Support Document was included as Exhibit B in the original Adjusted Standard Petition and is herein incorporated. The technical information contained in the Technical Support Document and the additional information provided with this Amended Petition, as applied to an analysis of the factors set forth in Section 814.402(b)(3), warrant the following conclusions:

A) The hydrogeological characteristics of the unit, the surrounding land and the site do not pose an environmental risk if the boundary is adjusted as requested;

B) The volume and physical and chemical characteristics of the leachate do not pose an environmental risk if the boundary is adjusted as requested;

C) The quantity, quality, and direction of flow of groundwater underlying the facility is not subject to further risk, and does not pose further risk, if the boundary is adjusted as requested;

D) There are no groundwater users who would be impacted if the boundary is adjusted as requested;

E) Alternative drinking water sources will not be necessary;

F) The existing quality of the groundwater will not be adversely impacted if the boundary is adjusted as requested (*See* discussion below regarding existing quality of groundwater and background concentrations in response to Board information request number 18);

G) The public health, safety, and welfare will be protected, and not adversely impacted, if the boundary is adjusted as requested;

H) The proposed zone of compliance will not extend beyond the facility property line nor beyond the annual high water mark of any navigable surface water (*See* discussion below regarding "annual high water mark" in response to Board information request numbers 19, 20 and 21.);

(I) The proposed zone of compliance will not extend beyond 150 meters from the edge of Brickyard I.[23]

The Petitioner offers the following regarding existing groundwater quality and previously approved background concentrations:

Quantitative Information

Pursuant to Section 814.402(b)(3), the Board may provide for a zone of attenuation and adjust the compliance boundary as part of an adjusted standard. However, a zone of attenuation does not currently exist at Unit I and has not been requested. The permitted groundwater

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[23] In response to Board information request number 22, the Petitioner revised Figures 7 and 9 and offers the following:
The compliance boundary has been revised to more closely reflect the locations of the current perimeter wells ("T" wells). Figures 7 and 9 of the Technical Support Document have been revised (as Figures 7REV and 9REV) to illustrate the most recent proposed compliance boundary location. The distance of the revised compliance boundary from the Unit I waste boundary varies dependent upon location, but is considerably less than the maximum 150 meter limit, except near well T110 where the area of the extraneous materials extend farther from the Unit I waste boundary. The proposed compliance boundary has not changed hydraulically upgradient (west) to the waste unit. Because groundwater movement is from west to east, monitor wells located outside the subject materials should be representative of background conditions, unaffected by the waste unit or extraneous materials. The placement of the compliance boundary is not as critical upgradient of the waste unit as the purpose of the monitoring network is to identify releases that could escape the landfill and move downgradient.

management zone exists along sections of the east and southern periphery of Unit I as shown in Figures 2, 3, 5, 6, 7, and 9 of the Technical Support Document. The areas within the groundwater management zone typically contain extraneous materials.

Data from the most recent sampling and reporting event (second quarter 2013) has been used to summarize the groundwater quality within the area bound by the proposed compliance boundary.

The second quarter sampling event is the most comprehensive event of the year, requiring analyses of parameters contained in lists G (field parameters), G1 (quarterly/routine parameters), G2 (semi-annual parameters), and assessment parameters (Modified Appendix II parameters including Dichlorodifluoromethane and 1,1-dichloroethane) for specified wells. Table 1A (tables attached as Exhibit C) lists all of the analytical data and background concentration(s) for each parameter and each well that exists within the proposed compliance boundary, and identifies concentrations which exceeded the applicable background values. The proposed compliance boundary does not extend north of Unit I; therefore, wells G33S, G34S, and G35S were not included in this summary.

Table 1B lists only those parameters that exceeded applicable background concentrations during the second quarter 2013 sampling event. Of the wells listed, six are upgradient to Unit I: G130, G133, G134, R103, T110 and T111. As stated in Section 4.1.2 of the Technical Support Document, wells T110 and T111 are located upgradient to the extraneous materials due to the bedrock trough east of Unit I, even though all other upgradient wells are west of Unit I. Five of the wells (A126, G125, G131, R123, and R124) are located within the area containing the extraneous materials. Five wells (R106, R127, R132, T113, and T114) are located beyond the limits of the extraneous materials. However, each of these wells is screened in or was advanced through disturbed soils creating spatially variable conditions. In addition to the multiple revisions of historical interwell and intrawell background concentrations, and pursuant to Condition No. VIII.A.22 of Permit Modification No. 97, intrawell background concentrations are being developed for total manganese and total recoverable phenols at well T114, and total manganese and total sulfate at well T115. Condition No. VIII.A.25 requires the development of an intrawell background value for dissolved magnesium at well R132. The referenced parameters were shown to be spatially variable and not affected by the waste unit or extraneous materials.

Any well approved for the monitor well network subsequent to the granting of the Amended Petition will require evaluation of the groundwater quality data with respect to appropriate background concentrations. Revisions to some background values will likely be necessary given the history of the facility.

Background Concentrations

As presented in Section 4.1.2 of the Technical Support Document, the migration pathway for Unit I has been identified as the coal seam, the mine void where the coal has been removed via underground mining, or the spoil/bedrock interface where surface mining has occurred; the pathway is continuous beneath Unit I. Groundwater subject to monitoring for Unit I occurs in the coal seam, mine voids, or on top of the shale underlying the mine spoil. Therefore, the groundwater within the coal deposit, mine voids, and strip mine area has been classified as a Class IV ("Other") groundwater pursuant to 35 Ill. Adm. Code Section 620.240(g). Because of the mining activities, the groundwater quality is highly variable dependent upon location (spatial variability). This creates complexities when comparing downgradient groundwater quality with background, upgradient groundwater quality. The permitted interwell background concentrations contained in the current permit were derived from data obtained from wells screened in the coal or unmined areas west of Unit I. To account for the significant spatial variability, intrawell background concentrations have been approved for numerous parameters at varying wells since the issuance of the significant modification permit. Spatial variability of the "T" wells was discussed in Section 4.6 of the Technical Support Document.

As stated above, numerous revisions to the background concentrations have occurred since the approval of the initial significant modification application. Table 2A lists the permits and related revisions to the background concentrations.

The term "annual high water mark"[24] as contained in Section 814.402(b)(3)(H) is ambiguous and does not fit the typical terminology for the study of hydrology. The term, as presented in Section 814.402(b)(3)(H), implies the highest water elevation that occurs on a frequency of one time per year (one-year recurrence interval) or a 100 percent probability of occurring annually. The annual high water mark will vary from year to year, which is why an average annual high (maximum) elevation was provided.

As stated in Section 4.8 of the Technical Support Document, the maximum river elevation (annual high water mark) was determined each year, from October 1, 1993 to July 18, 2012. The average of the annual high water marks was derived, resulting in an elevation of 519.14 feet above mean sea level (MSL). This does appear representative of what is stated in Section 814.402(b)(3)(H). The subject elevation does not encroach on the area containing the proposed compliance boundary.

The Federal Emergency Management Agency ("FEMA") Flood Insurance Study for Vermilion County (#1718CV000A) was evaluated to determine the Vermilion River elevations associated with the recurrence intervals of 10, 25, 50, and 100 years near Brickyard (attached

[24] Discussion relative to annual high water mark is responsive to Board information request number 19

hereto as Exhibit D). As shown in Exhibit D, a detailed study was conducted at a cross section directly adjacent to Unit II of the landfill facility (marked as Cross Section A). As listed in the accompanying Table 8 of the study, the 100-year flood elevation (1% probability of occurrence) at that location is 533.4 feet MSL. The remainder of the flood elevations had to be interpreted from the Flood Profiles graph (Drawing 10P). Exhibit D, page 2. The 50-year flood elevation (2% probability of occurrence) is approximately 531.9 feet MSL. The 25-year flood elevation (4% probability of occurrence) is approximately 530.5 feet MSL. It must be noted that the 25-year flood elevation was interpolated since the profile was not listed on the graph. The 10-year flood elevation (10% probability of occurrence) is approximately 529.2 feet MSL.[25]

The 100-year flood elevation (533.40 feet MSL) has been highlighted on Figure 3 of Exhibit E. As shown, the 100-year flood elevation is partially coincident with the proposed compliance boundary in the northeast corner of Unit I. Otherwise, the 100-year flood elevation is well outside the proposed compliance boundary. Therefore, the 50-year, 25-year, and 10-year flood elevations are further beyond the extent of the proposed compliance boundary. The average annual high water mark (519.14 feet MSL) is also highlighted on Figure 3 and is only present in a very small section of the far northeast corner of the map, well outside the proposed compliance boundary. It must be noted that the 100-year flood elevation (worst case) does not encroach on any well locations anticipated to be part of the monitor well network subsequent to approval of the Amended Petition.[26]

While other Board cases have examined adjusted standards sought in similar contexts, none are directly on point here. *See In the Matter of Petition of Johns Manville for an Adjusted Standard from 35 Ill. Adm. Code 811.310, 811.311, 811.318, 811.320 and 814*, AS 04-4

[25] Responsive to Board information request number 20.
[26] Responsive to Board information request number 21.

(December 6, 2007); *In the Matter of Petition of Carus Chemical for an Adjusted Standard from 35 Ill. Adm. Code 814, Subpart D, AS 98-1* (September 18, 1997); *In the Matter of Petition of Commonwealth Edison for an Adjusted Standard from 35 Ill. Adm. Code Parts 811 and 814*, AS 96-9 (August 15, 1996). Although none of these cases directly implicate Section 814.402(b)(3), they each provide some guidance for the adjusted standard sought here.

For example, in the *Johns Manville* case, the Board granted an adjusted standard which allowed for the drilling of test wells in a different location than required by the regulations of general applicability. Without an adjusted standard, the company would have been required to drill through a cover into a contaminated area. As here, Manville was able to demonstrate that the adjusted standard would be equally protective of the environment as the generally applicable regulation. *See In the Matter of Petition of Johns Manville for an Adjusted Standard from 35 Ill. Adm. Code 811.310, 811.311, 811.318, 811.320 and 814*, AS 04-4 (September 18, 1997), 2007 WL 4305448.

Similarly, the petitioner in *Commonwealth Edison* established that testing in accordance with the regulations of general applicability would have been technically and economically impractical, given the unique circumstances at its site. There, the landfill location was proximate to a quarry and required alternative leachate collection and groundwater monitoring. The petitioner established that following the general regulation would require tremendous expense for minimal and even questionable environmental benefit. The Board thus allowed the proposed adjustments. *See In the Matter of Petition of Commonwealth Edison for an Adjusted Standard from 35 Ill. Adm. Code Parts 811 and 814*, AS 96-9 (August 15, 1996), 1996 WL 473638.

As with the above cases, this case presents the Board with a petitioner who, without the adjusted standard, will be required to perform groundwater monitoring in an area that contains extraneous fill material and that area providesstructural support for the pre-Subtitle D landfill. Groundwater monitoring in that area will be ineffective to ascertain any accurate environmental impacts, a situation not anticipated in the promulgation of the rules of general applicability. Thus, like the above referenced cases, the Brickyard situation is appropriate for employing the adjustment standard mechanism provided for by the Board in Section 814.402(b)(3).

I. Consistency with Federal Law

Section 104.406(i) requires "[a] statement with supporting reasons that the Board may grant the proposed adjusted standard consistent with federal law. The Petitioner must also inform the Board of all procedural requirements applicable to the Board's decision on the petition that are imposed by federal hazardous waste laws are not required by this Subpart. Relevant regulatory and statutory authorities must be cited." 35 Ill. Adm. Code 104.406(i).

This adjusted standard request is consistent with federal law and there are no additional procedural requirements imposed by federal law. Federal law is not implicated because none of the extraneous material constitutes hazardous waste.

Further, as stated above, Brickyard I is a landfill defined and regulated pursuant to Part 814, Subpart D ("Standards for Existing Units Accepting Chemical and Putrescible Wastes that Must Initiate Closure Within Seven Years"). Certain regulations adopted pursuant to the newer federal Subtitle D regulations may be relevant to various aspects of Brickyard's landfill, particularly Unit II. Nevertheless, Section 814.402 is applicable here and specifically exempts Brickyard I from the following requirements: (1) the location standards in 35 Ill. Adm. Code 811.302(a), (c), (d), (e), and (f); (2) the foundation and mass stability analysis standards in 35 Ill. Adm. Code 811.304 and 811.305; (3) the liner and leachate drainage and collection requirements of 35 Ill. Adm. Code 811.306, 811.307, and 811.308; (4) the final cover requirements of 35 Ill.

Adm. Code 811.314; (5) the hydrogeological site investigation requirements of 35 Ill. Adm. Code 811.315; (6) the groundwater impact assessment standards of 35 Ill. Adm. Code 811.317 and the groundwater monitoring program requirements of 35 Ill. Adm. Code 811.318(c); and (7) the groundwater quality standards of 35 Ill. Adm. Code 811.320(a), (b) and (c).

Thus, the Petitioner and IEPA agree that the Petitioner does not need an exemption from any of those requirements. However, to the extent any of those enumerated Part 811 groundwater location standards apply to Brickyard I, the Petitioner and IEPA agree that the requested adjusted standard, sought pursuant to Section 814.402(b)(3), can be granted consistent with federal law and, if granted, would apply in lieu of those Part 811 standards. The proposed Order set forth in Exhibit A has been revised to be consistent with this Amended Petition and responsive to the Board's Order of August 8, 2013.[27]

Section 814.402(b)(3) sets forth certain standards that are applicable to Part 814, Subpart D facilities, such as this one. Section 814.402(b)(1) is relevant to the instant situation, providing that:

> No new units shall be opened and an existing unit may not expand beyond the area included in a permit prior to the effective date of this Part or, in case of permit exempt facilities, beyond the area needed for landfilling to continue until closure is initiated.

35 Ill. Adm. Code 814.402(b)(1). This provision was promulgated to ensure that existing landfills (those in place prior to the federal Subtitle D rules) not be permitted to expand.

Here, the Petitioner does not seek to expand this pre-Subtitle D landfill; rather, it seeks only to achieve final closure, consistent with the regulatory requirements, giving due consideration to its unique and historic circumstances. The Petitioner does not seek to receive new waste or expand the boundaries of Brickyard I. Instead, it seeks simply to achieve final

[27] Revised Exhibit A provided in response to Board information request number 25.

closure in a manner consistent with existing circumstances. Thus, Section 814.402(b)(1) is not implicated.

For the same reasons, Section 814.402(e), which requires application of various Part 811 regulations to a "lateral expansion" at existing MSWLF units, is also not implicated. The Petitioner does not seek to "expand" beyond the permitted boundary or accept any new waste. Thus, the requirements of Part 811 which are set forth in that section (foundation and mass stability standards, liner and leachate drainage and collection, groundwater impact assessment, groundwater monitoring systems, and groundwater quality standards) are also not implicated.

J. Waiver of Hearing (35 Ill. Adm. Code 104.406(j))

The Petitioner hereby waives hearing on this Amended Petition and notes that there were no requests for hearing made to the Board. Again, Petitioners do not seek a hearing before the Board and hope that the Board's questions have been addressed in this Amended Adjusted Standard Petition such that a hearing will not be required. If the Board determines that a hearing is necessary, Petitioner respectfully requests that such be held expeditiously, so that from a timing perspective, Petitioners might have a Board Order authorizing the Adjusted Standard prior to the end of calendar year 2013, so that the obligations set forth in this Order, including the cover requirements, can be addressed as soon as weather permits in 2014.

K. Supporting Documents (35 Ill. Adm. Code 104.406(k))

As justification for this adjusted standard the Petitioner provided, with the original Adjusted Standard Petition, a Technical Support Document that was prepared by AEI and, included, as Exhibit C, the "Extraneous Materials Cover Plan. With this Amended Petition, the Petitioner provides Revised Figures 7REV and 9REV (Exhibit B), cost data relating to the construction and maintenance of the Cover Plan (Exhibit C), groundwater monitoring data and permit modification history (Exhibit D) and information regarding flood profiles (Exhibit E).[28]

III. CONSISTENCY WITH SECTION 27(a) OF THE ACT

Section 28.1 of the Act requires that the Board, in granting adjusted standards, do so "consistent with Section 27(a) of the Act." Section 27(a) of the Act reads, in pertinent part, as follows:

> In promulgating regulations under this Act, the Board shall take into account the existing physical conditions, the character of the area involved, including the character of surrounding land uses, zoning classifications, the nature of the existing air quality or receiving body of water, as the case may be, and the technical feasibility in economic reasonableness of measuring or reducing the particular type of pollution.

415 ILCS 5/27(a). The various courts that have reviewed the Board's evaluation of the Section 27(a) factors have not required the Board to independently consider each and every factor. *See Granite City Div. of Nat'l Steel Co. v. Ill. Pollution Control Bd.*, 155 Ill. 2d. 149, 613 N.E. 2d, 719, 184 Ill. Dec. 502 (1993). Moreover, Section 28.1 only requires application in the specific context of the request before the Board. Here, the Board can certainly grant its adjusted standard consistent with Section 27(a) for the following reasons:

- The character of the area involved is such that the landfill, which has existed since 1981, is appropriately placed;
- The existing physical conditions at this landfill, as explained above and in the Technical Support Document, warrant the grant of an adjusted standard creating an alternative groundwater monitoring zone so that impacts may be more accurately assessed and the environment better protected;

[28] Responsive to Board information request numbers 22 and 23.

- The nature of the existing air quality will not be disturbed by an adjusted standard which simply allows an adjustment to the groundwater monitoring zone; rather, removal of material to accommodate monitoring outside the extraneous fill area *would* result in a risk to the existing air quality;
- An adjustment to the compliance boundary is technically feasible;
- The solution proposed in this Amended Petition is an economically reasonable one, specifically geared to address a unique situation: given due consideration to historically placed fill materials, in order to accurately monitor any relevant groundwater impacts during the post-closure care period of this pre-Subtitle D landfill.

IV. RESPONSES TO ISSUES IN AGENCY RECOMMENDATION

In its August 8, 2013 Order, the Board directed the Petitioner to address concerns that were expressed in the IEPA Recommendation, filed on July 15, 2013. The Petitioner offers the following in response to certain statements in the IEPA Recommendation.

In paragraphs 25 and 28 of the IEPA Recommendation, the IEPA asserts that removal of the extraneous material could someday be required and that removal would require considerable monetary costs. The engineering and monetary obstacles to removal were openly discussed with the IEPA over the long period of time that Brickyard and the IEPA worked toward agreement in this matter. While the Petition did not include a great deal of specifics on these points, the Petitioner believes that the technical staff at the IEPA did not doubt the truth of these assertions, at least in the general sense as they were expressed in the Petition. Since the assertions were only included as general statements, and there had been no disagreement on them during the lengthy discussions with the IEPA, the Petitioner thought it fair to include them in the Petition.

The IEPA included a reference to the implementation of the Cover Plan (Exhibit C to the Adj. Std. Pet.) being made a condition of any grant of an adjusted standard. This appears in Paragraph 31 and in the draft order language provided by the IEPA. In response to the Board's Order, this Amended Petition and its revisions to the Proposed Board Order now includes a provision for completing the Cover Plan work within twelve months of the grant of the adjusted standard. This is consistent with IEPA's Recommendation.

Although the IEPA Recommendation solidly supports grant of the relief requested, some of the IEPA statements appear critical of the Petitioner's discussion of the relief requested. *See* Agency Recommendation at Paragraphs 32, 33, 34 and 36. Petitioner believes that, in response to Board questions as reflected in this Amended Adjusted Standard petition, it has addressed the concerns raised.

V. <u>NOTICE REQUIREMENTS</u>

The Petitioner caused a "Notice of Petition by Brickyard Landfill for an Adjusted Standard before the Illinois Pollution Control Board" to be timely published in a newspaper of general circulation in the Danville area, specifically the *Commercial-News,* on June 4, 2013, in accordance with Section 28.1 of the Act and Section 104.408 of the Board's procedural rules. 415 ILCS 5/28.1; Section 104.408.

The Board's Order of August 8, 2013 provides that if this "amendment is a substantive change to the requested relief in that it requests additional or alternative relief," Brickyard must re-notice the petition. The Petitioner has reduced the number of provisions from which relief is sought, so the amendment should not be considered "substantive." However, because there is added information provided in support of the relief, the Petitioner will err on the side of caution and make an additional publication. Proof of that publication will be timely filed with the Board.

CONCLUSION

WHEREFORE, the Petitioner request that the Board grant an adjusted standard pursuant to Section 28.1 of the Illinois Environmental Protection Act, 415 ILCS 5/28.1 and Section 814.402(b)(3) of the Board's landfill regulations, as sought herein.

BRICKYARD DISPOSAL & RECYCLING, INC.

By: ______/s/William D. Ingersoll________________
One of Its Attorneys

Dated: October 9, 2013

BROWN, HAY & STEPHENS, LLP
Claire A. Manning
Registration No. 3124724
William D. Ingersoll
Registration No. 6186363
205 S. Fifth Street, Suite 700
P.O. Box 2459
Springfield, IL 62705-2459
(217) 544-8491

CERTIFICATE OF SERVICE

I, William D. Ingersoll, certify that I have this date served the attached Notice of Filing and Petitioner's Amended Adjusted Standard Petition, by means described below, upon the following persons:

To: Pollution Control Board, Attn: Clerk
100 West Randolph Street
James R. Thompson Center, Suite 11-500
Chicago, Illinois 60601-3218
(Via Electronic Filing)

Kyle N. Davis, Esq.
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue, East
P.O. Box 19276
Springfield, Illinois 62794-9276
(Via First-Class Mail and Email)

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, Illinois 62794-9274
(Via First-Class Mail and Email)

Dated: October 9, 2013

BROWN, HAY & STEPHENS, LLP
Claire A. Manning
William D. Ingersoll
cmanning@bhslaw.com
wingersoll@bhslaw.com
205 S. Fifth Street, Suite 700
P.O. Box 2459
Springfield, IL 62705-2459
(217) 544-8491

By: ___/s/William D. Ingersoll_______

CROSS REFERENCE
BOARD QUESTIONS/LOCATION OF RESPONSE IN AMENDED PETITION

Therefore, the Board accepts the petition but directs Brickyard to submit an amended petition addressing the following issues:

1.	Provide a specific reference to and a description of all standard(s) from which an adjusted standard is sought and the effective dates of the standards. *See* 35 Ill. Adm. Code 104.406(a); Pet. Exh. A.	p. 5
2.	Provide the number of persons employed by Brickyard's facility. *See* 35 Ill. Adm. Code 104.406(d).	pp. 8-9
3.	Provide the number of persons employed by Brickyard's facility. *See* 35 Ill. Adm. Code 104.406(d).	p. 9
4.	Describe the qualitative and quantitative nature of the emissions, discharges or releases currently generated by Brickyard's activity, including landfill gas and leachate and how those emissions, discharges or releases are managed. *See* 35 Ill. Adm. Code 104.406(d).	pp. 9-11

The Proposed Board Order (Pet. Exh. A) only grants relief from 35 Ill. Adm. Code 811.318(b)(3) and 811.318(b)(5) without proposing specific alternate requirements for these regulatory provisions. Accordingly, pursuant to 35 Ill. Adm. Code 104.406(f), the Board requests that Brickyard:

5.	Clarify the proposed placement of monitoring wells in relation to the proposed compliance boundary and the edge of the unit if an adjusted standard from 35 Ill. Adm. Code 811.318(b)(3) is requested. *See* 35 Ill. Adm. Code 104.406(f).	pp. 17-18
6.	Clarify if Brickyard is seeking relief from the monitoring well location requirements of 35 Ill. Adm. Code 811.318(b)(5). If temporary well T110 is not appropriate for monitoring groundwater at the edge of the zone of attenuation, propose an alternate location for a down-gradient monitoring well at the edge of the zone of attenuation. *See* 35 Ill. Adm. Code 104.406(f).	pp. 18-19

7.	Clarify if Brickyard is seeking relief from the statistical requirements of 35 Ill. Adm. Code 811.318(b)(5) found in 35 Ill. Adm. Code 811.320(e). If such relief is necessary, propose an alternate requirement for statistical analysis of groundwater monitoring data to demonstrate compliance with the applicable groundwater standards. *See* 35 Ill. Adm. Code 104.406(f), 811.320(e), 814.402(a)(8), 811.319(a)(1)(B), 811.319(a)(1)(C)(i), 811.319(a)(4)(B)(i), 811.319(b)(5)(G), and 811.320(d).	pp. 18-19
8.	Clarify whether Brickyard is also seeking relief from the provision of 35 Ill. Adm. Code 811.318(b)(5) that sets forth the requirement for determining a violation of the groundwater quality standards at the compliance boundary. If relief from this provision is sought, propose an alternate requirement for demonstrating compliance with the applicable groundwater quality standard at the compliance boundary. *See* 35 Ill. Adm. Code 104.406(f).	pp. 18-19
9.	If requesting an adjusted standard from 35 Ill. Adm. Code 811.320(c), explain how this subsection is applicable and the reasoning for the request along with a proposed alternate requirement to reflect Brickyard's intent. *See* 35 Ill. Adm. Code 104.406(f), 814.402(a)(8), Pet. Exh. A.	p. 19
10.	Revise the proposed conditions of the adjusted standard to reflect that the Board, not the Agency, may adjust the compliance boundary, consistent with the provisions of 35 Ill. Adm. Code 814.402(b)(3). *See* 35 Ill. Adm. Code 104.406(f), Pet. Exh. A.	p. 17, Ex. A
11.	Provide clarification on Brickyard's request for a "*temporary* Applicable Groundwater Quality Standard." Pet. Exh. A. (emphasis added). If Brickyard is seeking an adjusted standard from the 35 Ill. Adm. Code 302 numeric water quality standards that are applicable pursuant to 35 Ill. Adm. Code 814.402(b)(3), propose specific alternate groundwater quality standards and provide information in accordance with Section 28.1 of the Act (415 ILCS 5/28.1 (2010)) and the procedures of 35 Ill. Adm. Code 104.Subpart D. *See* 35 Ill. Adm. Code 104.406(f), 811.320(a), 811.320(b), 814.402(a)(8), and 814.402(b)(3).	p. 20
12.	If requesting an adjusted standard from the definition of "compliance boundary" at 35 Ill. Adm. Code 814.402(b)(3), state such a request and include language for an alternate definition consistent with the "zone of compliance" that may be provided by the Board consistent with 35 Ill. Adm. Code 814.402(b)(3)(H) and 814.402(b)(3)(I). *See* 35 Ill. Adm. Code 104.406(f).	pp. 20-21

13. If requesting an adjusted standard from the definition of "zone of attenuation" set forth in 35 Ill. Adm. Code 810.103, expressly state the request and propose language for an alternate definition consistent with the zone of attenuation that may be provided by the Board in 814.402(b)(3)(H) and 814.402(b)(3)(I). Integrate the specifics for the bottom of the uppermost aquifer as well as the lateral extent into thedepiction or description of the proposed zone of attenuation and compliance boundary. *See* 35 Ill. Adm. Code 104.406(f). p. 21

14. Describe what institutional controls are proposed "to contain the extraneous materials in the existing location." Pet. at 13, *see* 35 Ill. Adm. Code 104.406(f). p. 22

15. Propose a condition of the adjusted standard that would encompass the institutional controls referenced in the petition. *See* 35 Ill. Adm. Code 104.406(f). p. 17, Ex. A

16. Propose a condition of the adjusted standard regarding Brickyard's commitment to proceed with the extraneous materials cover plan and the date by which it must be completed. *See* 35 Ill. Adm. Code 104.406(f). P. 17, Ex. A

17. Address the costs associated with the institutional controls and extraneous materials cover plan. *See* 35 Ill. Adm. Code 104.406(f). p. 23, Ex. C

18. Provide quantitative information on the existing groundwater quality within the proposed zone of attenuation as well as the background concentrations approved by the Agency thus far. *See* 35 Ill. Adm. Code 104.406(h). p. 28, Ex. D

Section 814.402(b)(3)(H) of the Board regulations provides, "[i]n no case shall the zone of compliance extend beyond the facility property line or beyond the annual high water mark of any navigable surface water." 35 Ill. Adm. Code 814.402(b)(3)(H).

19. Address whether the "*average* annual high water mark" as proposed in the petition or the *maximum* annual high water mark of all years recorded is consistent with the requirements of 35 Ill. Adm. Code 814.402(b)(3)(H). p. 31

20. Instead of an average or maximum, provide comments on using an annual high water mark statistically associated with a recurrence interval of 10, 25, 50 or 100 years (i.e. 10%, 4%, 2% or 1% probability). pp. 31-32

21. Indicate the values for the annual high water mark for the 10-, 25-, 50- and 100-year recurrence intervals and whether the proposed zone of attenuation would extend beyond these values. p. 32

Section 814.402(b)(3)(I) provides, "[n]otwithstanding the limitations of subsection 814.402(b)(3)(H), in no case shall the zone of compliance at an existing [Municipal Solid Waste Landfill] unit extend beyond 150 meters from the edge of the unit." *See* 35 Ill. Adm. Code 814.402(b)(3)(I). Figure 7 of the TSD depicts the "proposed compliance boundary" with a red dashed line. Based on the scale of Figure 7, the contour of the red dashed line appears to extend beyond 150 meters in three places: the southwest corner of the unit between N 50000 and N 49500; the southwest corner between E 2000 and E 3000; and the east corner between N 50000 and N 50500 near the E 5000 line. Therefore, the Board requests that Brickyard:

22. Present a revised figure showing a proposed compliance boundary within 150 meters from the edge of the unit and within the facility property line. Please ensure that the thickness of the line used to depict the proposed compliance boundary is also within 150 meters from the edge of the unit and the facility property line. p. 28, Ex. B

23. Revise Figure 9 of the petition to more clearly depict the property boundary. pp. 36-37, Ex.B

24. Provide justification for the adjusted compliance boundary along sections of the unit's perimeter where the extraneous material is not present. pp. 22-23

25. Propose specific, revised adjusted standard language reflecting all of the standards from which Brickyard seeks relief along with a list of conditions pertaining to the alternate requirements Brickyard proposes to mee p. 35, Ex. A

EXHIBIT A

SUGGESTED BOARD FINDING

The Board finds that Brickyard I has proven that Section 28.1 of the Act (415 ILCS 5/28.1) and Section 814.402(b)(3) of the Board's rules (35 Ill. Adm. Code 814.402(b)(3)) support granting the adjusted standard. Therefore, the Board authorizes an adjustment to the Brickyard I compliance boundary to the limits as shown by redlining in the Revised Figure 9, dated September 2013 attached hereto.

PROPOSED BOARD ORDER

Brickyard Disposal and Recycling, Inc. is granted an adjusted standard from the requirements of 35 Ill. Adm. Code 811.318(b)(3) for the monitoring network wells relative to Brickyard, Unit I, permit 1981-24-DE, Site Number 1838040029. This adjusted standard is subject to the following conditions:

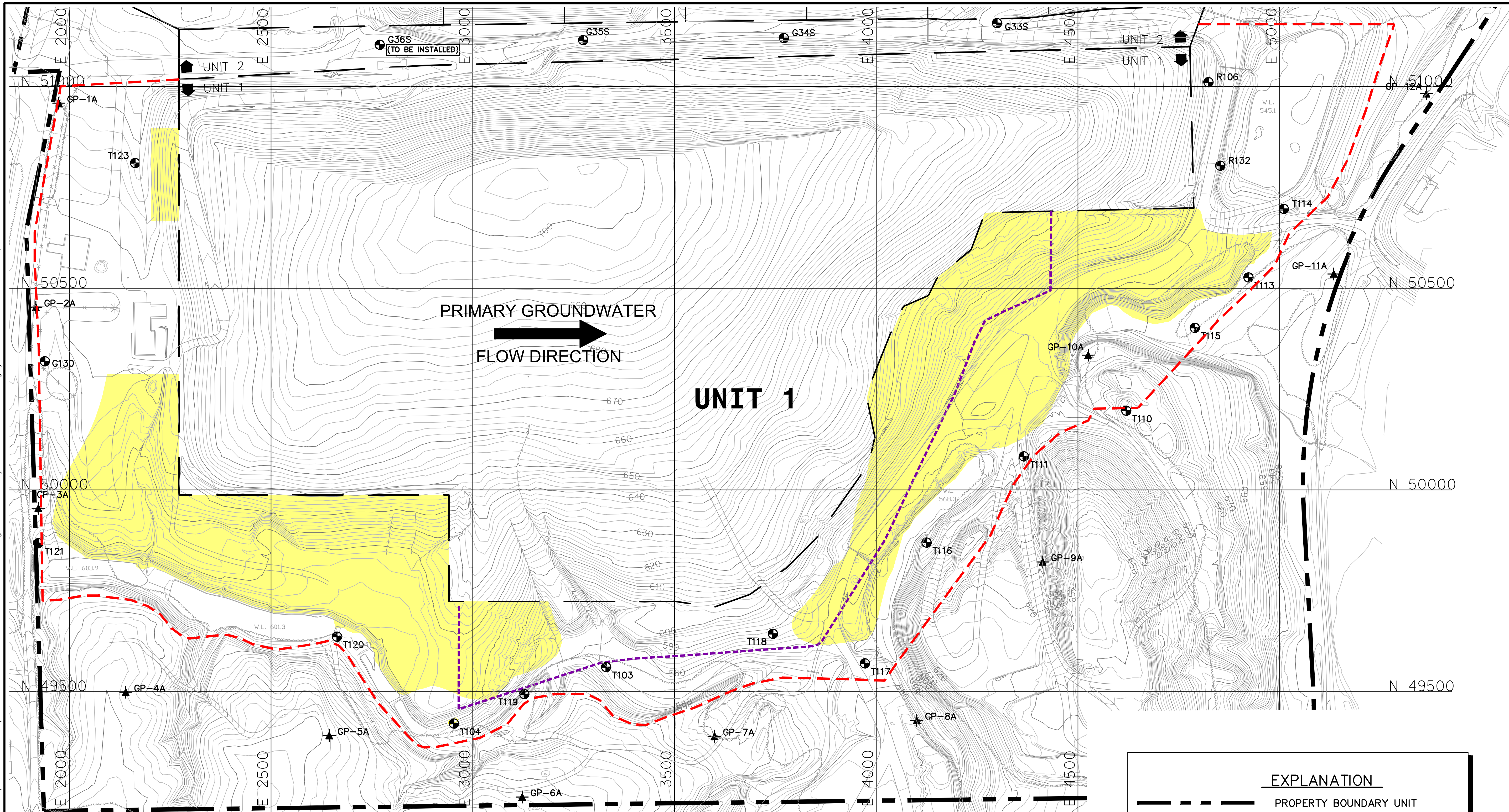
1. The Brickyard I compliance boundary is adjusted to the limits as shown by redlining in the Revised Figure 9, dated September 2013, attached hereto.

2. In lieu of the requirements of 35 Ill. Adm. Code 811.318(b)(3), Brickyard I shall comply with the following:

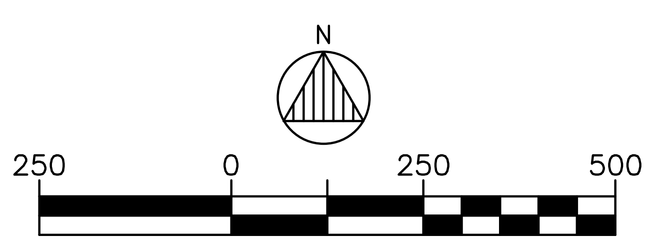
   Monitoring wells shall be established as close to the potential source of discharge as possible without interfering with the waste disposal operations. The monitoring points shall be located within the compliance boundary, as shown by redlining in the Revised Figure 9, dated September 2013, attached hereto, and downgradient, with respect to groundwater flow, from the source.

3. Within 90 days of the date of this Order, Brickyard shall submit a significant modification permit application to the Agency for a groundwater monitoring network for Unit I, consistent with the relief granted herein.

4. Within 12 months of the date of this Order, Brickyard shall complete placement of additional cover to those areas identified in the Cover Plan, and as otherwise determined necessary during cover placement operations. The Construction Certification Report shall be submitted to the Illinois EPA within 60 days of completion of cover placement.



NOTES:
1. THE PROPOSED COMPLIANCE BOUNDARY DOES NOT EXTEND BEYOND 150 METERS FROM THE UNIT 1 WASTE BOUNDARY.
2. CONTOURS WERE GENERATED FROM THE FLYOVER TAKEN ON FEBRUARY 17, 2013 BY COOPER AERIAL SURVEYS, CO. CONTOUR INTERVAL SHOWN IS 2 FEET.
3. FOR CLARITY, NOT ALL SITE FEATURES ARE SHOWN.
4. BACKGROUND WELLS INCLUDE G130, T121 AND T123.
5. ACTUAL MONITOR WELL LOCATIONS MUST BE APPROVED VIA ILLINOIS EPA PERMIT APPLICATION.



SCALE: IN FEET

EXPLANATION
- PROPERTY BOUNDARY UNIT
- APPROXIMATE WASTE BOUNDARY
- EXISTING GMZ
- PROPOSED COMPLIANCE BOUNDARY
- PERMITTED MONITORING WELL
- Txxx TEMPORARY WELL
- EXISTING GAS MONITORING PROBE
- AREA OF EXTRANEOUS MATERIALS

ANDREWS ENGINEERING, INC.
3300 Ginger Creek Drive, Springfield, IL 62711-7233
Tel (217) 787-2334 Fax (217) 787-9495
Pontiac, IL • Naperville, IL • Indianapolis, IN • Warrenton, MO

DRAWN BY: WCU
DESIGNED BY: JLR
APPROVED BY: JLR

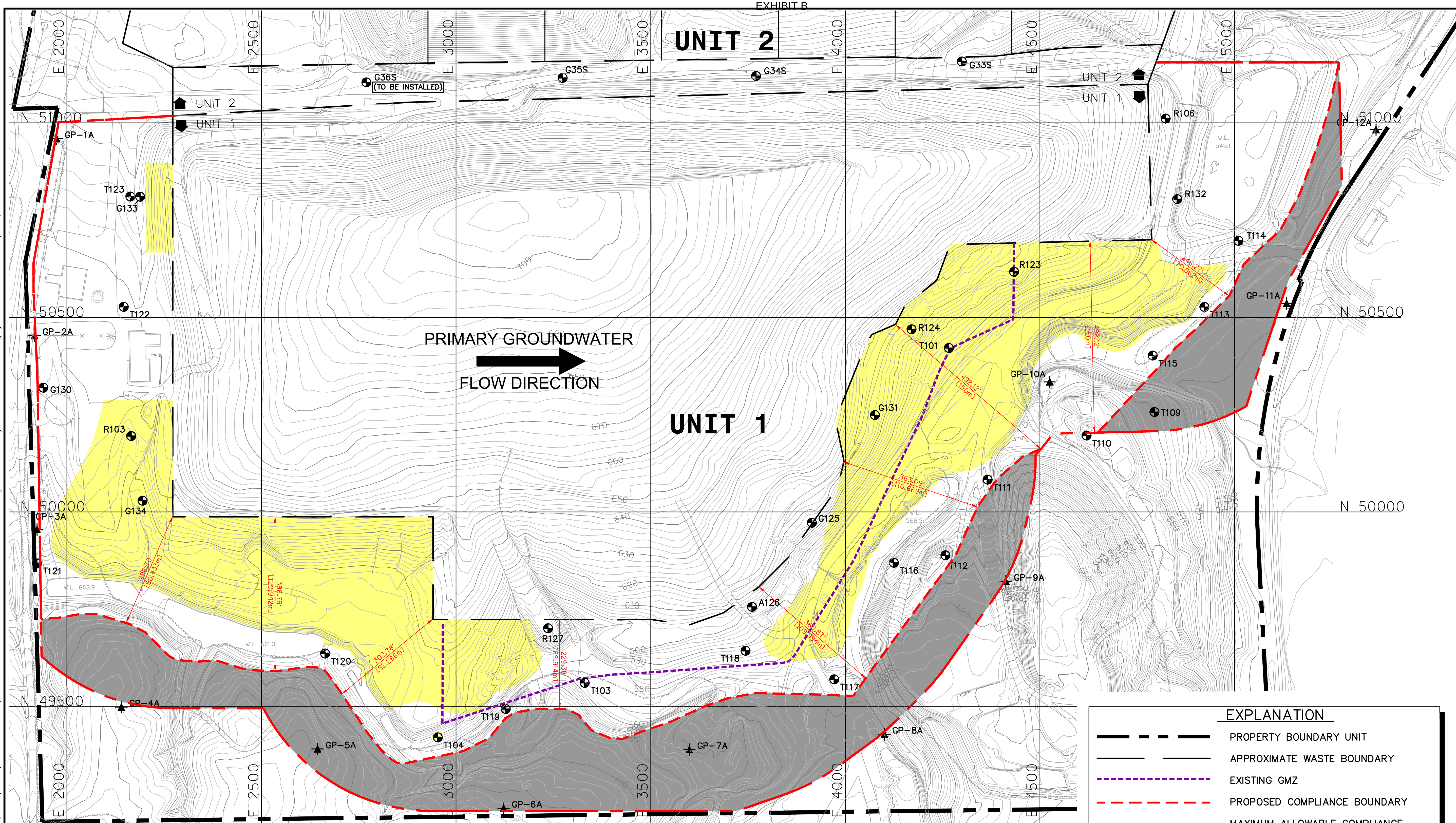
PROPOSED MONITOR WELL NETWORK

PLANS PREPARED FOR
BRICKYARD DISPOSAL & RECYCLING
DANVILLE, ILLINOIS

DATE: SEPTEMBER 2013
PROJECT ID: 89-115A
SHEET NUMBER: FIG. 9 REV.

File: J:\1989\89-115A (Brickyard)\DWG\2011\REVISED FIGS\PROPOSED MONITOR WELL NETWORK.dwg Tab: Layout1 User: mnguyen Plotted: Oct 08, 2013 - 3:21 PM

EXHIBIT B



N

0	25	50	75	100	125	150	

SCALE: IN METERS

250 0 250 500

SCALE: IN FEET

NOTES:

1. THE PROPOSED COMPLIANCE BOUNDARY DOES NOT EXTEND BEYOND 150 METERS FROM THE UNIT 1 WASTE BOUNDARY.
2. CONTOURS WERE GENERATED FROM THE FLYOVER TAKEN ON FEBRUARY 17, 2013 BY COOPER AERIAL SURVEYS, CO. CONTOUR INTERVAL SHOWN IS 2 FEET.
3. FOR CLARITY, NOT ALL SITE FEATURES ARE SHOWN.

EXPLANATION

- PROPERTY BOUNDARY UNIT
- APPROXIMATE WASTE BOUNDARY
- EXISTING GMZ
- PROPOSED COMPLIANCE BOUNDARY
- MAXIMUM ALLOWABLE COMPLIANCE BOUNDARY
- PERMITTED MONITORING WELL
- Txxx TEMPORARY WELL
- EXISTING GAS MONITORING PROBE
- AREA OF EXTRANEOUS MATERIALS
- AREA BETWEEN PROPOSED COMPLIANCE BOUNDARY AND MAXIMUM COMPLIANCE BOUNDARY

ANDREWS ENGINEERING, INC.
3300 Ginger Creek Drive, Springfield, IL 62711-7233
Tel (217) 787-2334 Fax (217) 787-9495
Pontiac, IL • Naperville, IL • Indianapolis, IN • Warrenton, MO

APPROVED BY: JLR
DESIGNED BY: JLR
DRAWN BY: WCU

MAXIMUM COMPLIANCE BOUNDARY

PLANS PREPARED FOR
BRICKYARD DISPOSAL & RECYCLING
DANVILLE, ILLINOIS

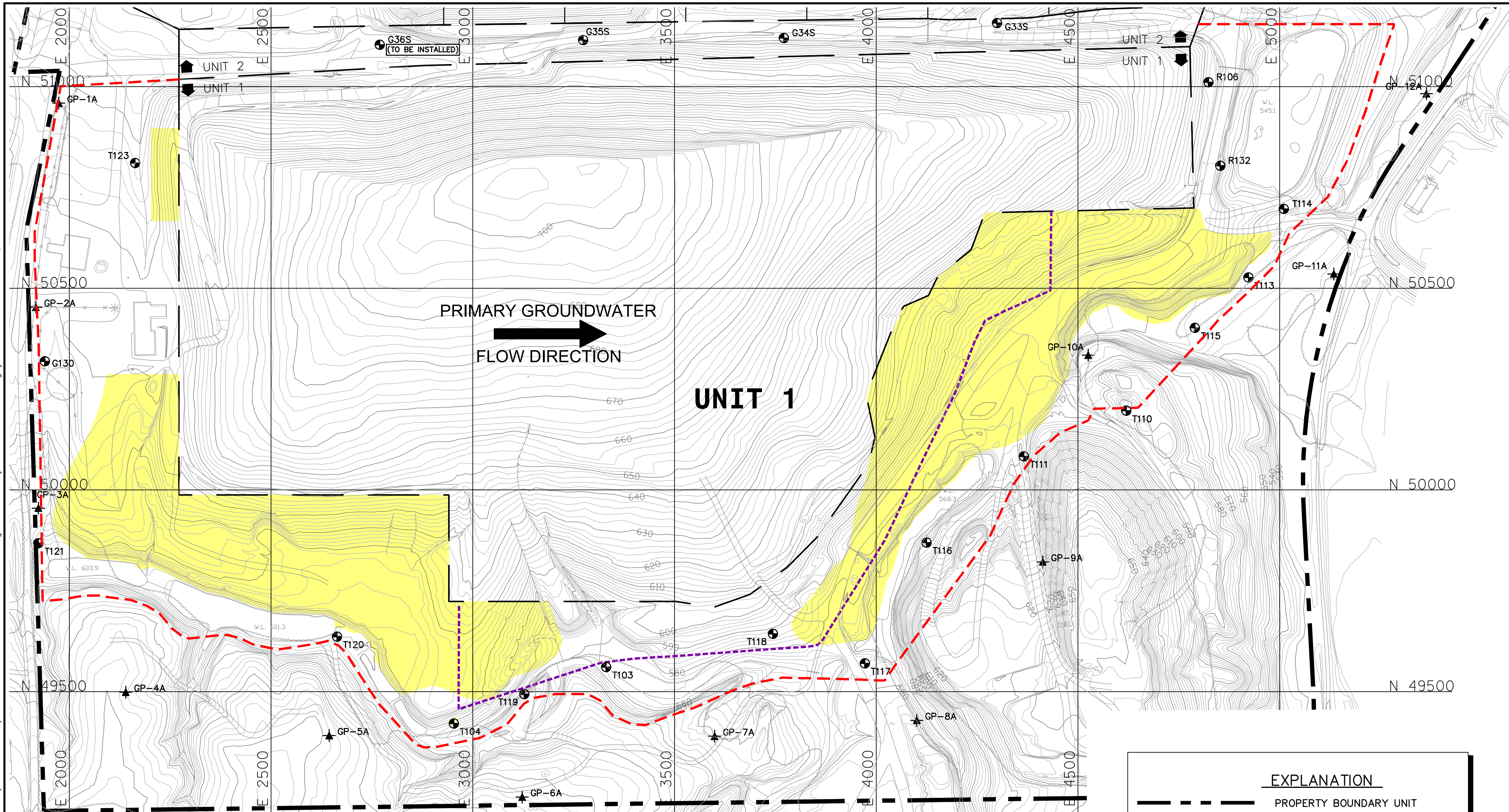
DATE: SEPTEMBER 2013

PROJECT ID: 89-115A

SHEET NUMBER:

FIG. 7 REV.

File: J:\1989\89-115A (Brickyard)\DWG\2011\REVISED FIGS\MONITORING PNT LOCATIONS_REV4_FIG 8A.dwg Tab: Layout1 User: mnguyen Plotted: Sep 12, 2013 - 2:55 PM



N

250 0 250 500

SCALE: IN FEET

NOTES:

1. THE PROPOSED COMPLIANCE BOUNDARY DOES NOT EXTEND BEYOND 150 METERS FROM THE UNIT 1 WASTE BOUNDARY.
2. CONTOURS WERE GENERATED FROM THE FLYOVER TAKEN ON FEBRUARY 17, 2013 BY COOPER AERIAL SURVEYS, CO. CONTOUR INTERVAL SHOWN IS 2 FEET.
3. FOR CLARITY, NOT ALL SITE FEATURES ARE SHOWN.
4. BACKGROUND WELLS INCLUDE G130, T121 AND T123.
5. ACTUAL MONITOR WELL LOCATIONS MUST BE APPROVED VIA ILLINOIS EPA PERMIT APPLICATION.

EXPLANATION

- PROPERTY BOUNDARY UNIT
- APPROXIMATE WASTE BOUNDARY
- EXISTING GMZ
- PROPOSED COMPLIANCE BOUNDARY
- PERMITTED MONITORING WELL
- Txxx TEMPORARY WELL
- EXISTING GAS MONITORING PROBE
- AREA OF EXTRANEOUS MATERIALS

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PROPOSED MONITOR WELL NETWORK

PLANS PREPARED FOR
BRICKYARD DISPOSAL & RECYCLING
DANVILLE, ILLINOIS

DATE: SEPTEMBER 2013
PROJECT ID: 89-115A
SHEET NUMBER:
FIG. 9 REV.

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EXHIBIT C

Construction Quality Assurance Oversight

Brickyard Disposal 4 Acre Cover Augmentation and Sidewall Berms

ACTIVITY	UNIT COST	ONSITE%/ QUANTITY		TOTAL COST
		Total Acreage		4
Lab Testing				
Soil Tests	Unit Cost	Test Needed		Cost
Soil Proctors	185.00	3	$	555.00
Grain Size	110.00	3	$	330.00
Atterberg Limits	80.00	3	$	240.00
Triaxial Permeability	350.00	3	$	1,050.00
		Sub Total	$	2,175.00
Sidewall Berm Placement Oversight				
Days of Placement	15			
Personnel/ Equipment	Rate	Onsite %/ Quantity		Cost
Junior Engineer	86.00	30	$	3,096.00
Engineering Technician	70.00	80	$	6,720.00
Professional Engineer	154.00	30	$	5,544.00
GPS Surveying Equipment	425.00	10	$	4,250.00
Laths	35.00	3	$	105.00
		Sub Total	$	19,715.00
Clay Placement Oversight				
Days of Placement	5.0			
Personnel	Rate	Onsite %/ Quantity		Cost
Junior Engineer	86.00	50	$	1,720.00
Engineering Technician	70.00	80	$	2,240.00
Professional Engineer	154.00	30	$	1,848.00
GPS Surveying Equipment	425.00	20	$	425.00
Nuke Gauge	150.00	5	$	750.00
		Sub Total	$	6,983.00
Cover and Seeding Oversight				
Days of Placement	5			
Personnel	Rate	Onsite %/ Quantity		Cost
Junior Engineer	86.00	30	$	1,032.00
Engineering Technician	70.00	70	$	1,960.00
Professional Engineer	154.00	30	$	1,848.00
GPS Surveying Equipment	425.00	20	$	8,500.00
		Sub Total	$	13,340.00
Permitting/Reporting				
CQA Report			$	8,000.00
ACOE Permitting			$	15,000.00
		Sub Total	$	23,000.00
		Total		**$65,213.00**

EXHIBIT C

Extraneous Materials Cover Plan				
Brickyard Disposal 4 Acre Cover Augmentation and Sidewall Berms				
ACTIVITY	**TOTAL (UNITS)**	**UNIT TYPE**	**UNIT COST**	**TOTAL COST**
MOBILIZATION/DEMOBILIZATION	1	Lump Sum	$85,000.00	$85,000.00
BACKFILLING AND GRADING				
Sidewall Berm- Excavate, Haul, Place and Compact	21000	Cubic Yards	$7.00	$147,000.00
Grading/Clearing - Machine and Operators	60	Hours	$140.00	$8,400.00
EARTHEN LOW PERMEABILITY LAYER PLACEMENT				
Load, Haul, Place, and Compact	6453	Cubic Yards	$7.00	$45,173.33
FINAL PROTECTIVE LAYER PLACEMENT				
Load, Haul, Place, and Grade General Protective and Vegetation Layer	3227	Cubic Yards	$6.00	$19,360.00
VEGETATION				
Lime, Fertilize, Seed, and Mulch	4.0	Acre	$1,750.00	$7,000.00
Turf Reinforcement Mat (Landlock 450)	21000	Square Yard	$5.00	$105,000.00
SUBTOTAL				**$416,933.33**
CONTINGENCIES				
15% of Subtotal				$62,540.00
			TOTAL	**$479,473.33**

Note:

Four acres were assumed for cover costs (instead of three)for purposes of being conservative.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
A126	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
A126	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
A126	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
A126	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
A126	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
A126	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
A126	1,1-Dichloropropene	ug/L	1	G2	5			< 5
A126	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
A126	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
A126	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
A126	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
A126	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 10
A126	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 10
A126	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 2.5
A126	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
A126	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
A126	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
A126	1,3-Dichlorobenzene	ug/L	1	G2	10			< 2.5
A126	1,3-Dichloropropane	ug/L	1	G2	5			< 5
A126	1,3-Dichloropropene	ug/L	1	G2	5			< 5
A126	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 2.5
A126	2,2-Dichloropropane	ug/L	1	G2	5			< 5
A126	2,4,5-TP (Silvex)	ug/L	1		0.3		250	< 2
A126	2,4-D	ug/L	1		0.3		350	< 10
A126	2,4-Dimethylphenol	ug/L	1					< 10
A126	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
A126	2-Chlorotoluene	ug/L	1	G2	5			< 5
A126	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
A126	2-Methylnaphthalene	ug/L	1				140	< 10
A126	4,4'-DDT	ug/L	1		0.01			< 0.1
A126	4-Chlorotoluene	ug/L	1	G2	5			< 5
A126	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
A126	4-Methylphenol	ug/L	1		10			< 10
A126	Acenaphthene	ug/L	1				2100	< 10
A126	Acenaphthylene	ug/L	1					< 10
A126	Acetone	ug/L	1	G2	10		6300	< 10
A126	Acrolein	ug/L	1					< 5
A126	Acrylonitrile	ug/L	1	G2	100			< 5
A126	Alachlor	ug/L	1		0.5		10	< 2
A126	Aldicarb	ug/L	1		4		15	< 2
A126	Aldrin	ug/L	1		0.004			< 0.05
A126	Ammonia as N, Diss.	mg/L	1	G1	1.82	0.13		< 0.1
A126	Anthracene	ug/L	1		1.75		10500	< 10
A126	Anthracene	ug/L	1				10500	< 10
A126	Antimony, total	ug/L	1		10	10	24	< 3
A126	Arsenic, dissolved	ug/L	1	G1	19	7	200	< 2
A126	Arsenic, total	ug/L	1		27	198.32	200	< 2
A126	Atrazine	ug/L	1		0.5		15	< 3
A126	Barium, total	ug/L	1		1920	1013.31	2000	48
A126	Benzene	ug/L	1	G2	5		25	< 5
A126	Benzo(a)pyrene	ug/L	1		10		2	< 0.2
A126	Beryllium, total	ug/L	1		9.7	4	500	< 1
A126	bis(2-ethylhexyl)phthalate	ug/L	1				60	< 6
A126	Boron, dissolved	ug/L	1	G1	1901	40	2000	< 10
A126	Boron, total	ug/L	1		1200	174.42	2000	60
A126	Bromobenzene	ug/L	1	G2	5			< 5
A126	Bromochloromethane	ug/L	1	G2	5			< 5
A126	Bromodichloromethane	ug/L	1	G2	5			< 1
A126	Bromoform	ug/L	1	G2	5			< 1
A126	Bromomethane	ug/L	1	G2	5			< 5
A126	Butylbenzylphthalate	ug/L	1					< 10
A126	Cadmium, dissolved	ug/L	1	G1	68	1	50	< 1
A126	Cadmium, total	ug/L	1		11	11	50	< 1
A126	Carbofuran	ug/L	1		4		200	< 5
A126	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
A126	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
A126	Chlordane	ug/L	1		0.01		10	< 0.5

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
A126	Chloride, dissolved	mg/L	1	G1	276	24.36		18
A126	Chloride, total	mg/L	1		292	27.44		129
A126	Chlorobenzene	ug/L	1	G2	5		500	< 5
A126	Chloroethane	ug/L	1	G2	10			< 10
A126	Chloroform	ug/L	1	G2	5		350	< 1
A126	Chloromethane	ug/L	1	G2	10			< 10
A126	Chromium, dissolved	ug/L	1	G1	3	5	1000	< 1
A126	Chromium, total	ug/L	1		390	610.73	1000	< 1
A126	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	8.8
A126	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
A126	Cobalt, total	ug/L	1		45	233.28	1000	< 1
A126	Copper, total	ug/L	1		140	359	650	< 1
A126	Cyanide, total	mg/L	1	G1	0.005	0.01	0.6	< 0.005
A126	Dalapon	ug/L	1		1.5		2000	< 3
A126	Dibenzofuran	ug/L	1					< 10
A126	Dibromochloromethane	ug/L	1	G2	5			< 1
A126	Dibromomethane	ug/L	1	G2	5			< 5
A126	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
A126	Dieldrin	ug/L	1		0.02			< 0.1
A126	Diethylphthalate	ug/L	1				5600	< 10
A126	Dimethylphthalate	ug/L	1					< 10
A126	Di-n-butylphthalate	ug/L	1		10		3500	< 10
A126	Dinoseb	ug/L	1		1.5		70	< 1
A126	Endothall	ug/L	1		40		100	< 9
A126	Endrin	ug/L	1		0.006		10	< 0.1
A126	Ethylbenzene	ug/L	1	G2	5		1000	< 5
A126	Fluoranthene	ug/L	1				1400	< 10
A126	Fluorene	ug/L	1				1400	< 10
A126	Fluoride, total	mg/L	1		2.578	540	4	< 0.5
A126	gamma-BHC (Lindane)	ug/L	1		0.009		1	< 0.05
A126	Heptachlor	ug/L	1		0.003		2	< 0.05
A126	Heptachlor Epoxide	ug/L	1		0.24		1	< 0.05
A126	Hexachlorobutadiene	ug/L	1	G2	10			< 10
A126	Iodomethane	ug/L	1	G2	5			< 5
A126	Iron, total	ug/L	1		20654000	310397.4		1990
A126	Isophorone	ug/L	1		10			< 10
A126	Isopropylbenzene	ug/L	1	G2	5		3500	< 2
A126	Lead, dissolved	ug/L	1	G1	16	2	100	< 2
A126	Lead, total	ug/L	1		105	489.32	100	< 2
A126	Magnesium, dissolved	mg/L	1	G1	30.9	189.7		117
A126	Manganese, total	ug/L	1		2150	5350.82		277
A126	Mercury, dissolved	ug/L	1	G1	0.2	0.2	10	< 0.2
A126	Mercury, total	ug/L	1		960	0.2	10	< 0.2
A126	Methoxychlor	ug/L	1		0.24		200	< 0.5
A126	Methylene Chloride	ug/L	1	G2	5		50	< 5
A126	Naphthalene	ug/L	1	G2	10		220	< 10
A126	n-Butylbenzene	ug/L	1	G2	5			< 5
A126	Nickel, total	ug/L	1		1410	645.92	2000	< 1
A126	Nitrate as N, dissolved	mg/L	1	G1	1.37	0.15	100	< 0.1
A126	Nitrate as N, total	mg/L	1		0.88	0.28	100	< 0.1
A126	n-Propylbenzene	ug/L	1	G2	5			< 5
A126	Oil (Hexane Soluble)	mg/L	1	G2	13	1		< 1
A126	Parathion	ug/L	1		5			< 10
A126	Pentachlorophenol	ug/L	1		50		5	< 1
A126	pH (field)	SU	1	G1	7.56 - 8.21	6.39 - 7.07		6.57
A126	Phenanthrene	ug/L	1					< 10
A126	Phenolics	ug/L	1	G2	10	10	100	< 10
A126	Picloram	ug/L	1		0.8		5000	< 3
A126	p-Isopropyltoluene	ug/L	1	G2	5			< 2
A126	Polychlorinated Biphenyls(PCBs	ug/L	1		1		2.5	< 0.5
A126	Pyrene	ug/L	1				1050	< 10
A126	sec-Butylbenzene	ug/L	1	G2	5			< 5
A126	Selenium, total	ug/L	1		9	2	50	< 2
A126	Silver, total	ug/L	1		1	1		< 1
A126	Simazine	ug/L	1		5		40	< 5
A126	Specific Conductance (field)	umhos/cm	1	G1	2578			778
A126	Styrene	ug/L	1	G2	5		500	< 5

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
A126	Sulfate, dissolved	mg/L	1	G1	79	503.6		155
A126	Sulfate, total	mg/L	1		79	469.36		139
A126	tert-Butylbenzene	ug/L	1	G2	5			< 5
A126	Tetrachloroethene	ug/L	1	G2	5		25	< 5
A126	Tetrahydrofuran	ug/L	1	G2	5			< 5
A126	Thallium, total	ug/L	1		10	10	20	< 2
A126	Tin, total	ug/L	1					< 20
A126	Toluene	ug/L	1	G2	5		2500	< 5
A126	Total Dissolved Solids	mg/L	1	G1	1421	1606.56	1200	1040
A126	Toxaphene	ug/L	1		0.24		15	< 1
A126	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
A126	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
A126	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 5
A126	Trichloroethene	ug/L	1	G2	5		25	< 5
A126	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
A126	Vanadium, total	ug/L	1		140	357.81	100	< 5
A126	Vinyl Acetate	ug/L	1	G2	10			< 5
A126	Vinyl Chloride	ug/L	1	G2	10		10	< 2
A126	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
A126	Zinc, dissolved	ug/L	1	G1	9	5	10000	< 5
A126	Zinc, total	ug/L	1		760	1500.61	10000	< 5
G125	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
G125	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
G125	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
G125	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
G125	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
G125	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
G125	1,1-Dichloropropene	ug/L	1	G2	5			< 5
G125	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
G125	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
G125	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
G125	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
G125	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 10
G125	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 10
G125	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 10
G125	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
G125	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
G125	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
G125	1,3-Dichlorobenzene	ug/L	1	G2	10			< 10
G125	1,3-Dichloropropane	ug/L	1	G2	5			< 5
G125	1,3-Dichloropropene	ug/L	1	G2	5			< 5
G125	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 10
G125	2,2-Dichloropropane	ug/L	1	G2	5			< 5
G125	2,4-Dimethylphenol	ug/L	1					< 10
G125	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
G125	2-Chlorotoluene	ug/L	1	G2	5			< 5
G125	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
G125	2-Methylnaphthalene	ug/L	1				140	< 10
G125	4-Chlorotoluene	ug/L	1	G2	5			< 5
G125	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
G125	Acenaphthene	ug/L	1				2100	< 10
G125	Acenaphthylene	ug/L	1					< 10
G125	Acetone	ug/L	1	G2	10		6300	< 100
G125	Acrylonitrile	ug/L	1	G2	100			< 5
G125	Aluminum, total	ug/L	1		162000	27406.2		< 50
G125	Ammonia as N, Diss.	mg/L	1	G1	1.82	5.04		16.2
G125	Ammonia as N, total	mg/L	1		1.75	3.92		16.9
G125	Anthracene	ug/L	1				10500	< 10
G125	Antimony, total	ug/L	1		10	10	24	< 6
G125	Arsenic, dissolved	ug/L	1	G1	19	48	200	24
G125	Arsenic, total	ug/L	1		27	135.1	200	30
G125	Barium, total	ug/L	1		1920	391.54	2000	79
G125	Benzene	ug/L	1	G2	5		25	< 5
G125	Benzoic Acid	ug/L	1				28000	< 50
G125	Beryllium, total	ug/L	1		9.7	2	500	< 1
G125	Biochemical Oxygen Demand	mg/L	1		34.3	61.23		10
G125	bis(2-ethylhexyl)phthalate	ug/L	1				60	< 5

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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
G125	Boron, dissolved	ug/L	1	G1	1901	546.3	2000	450
G125	Boron, total	ug/L	1		1200	758.76	2000	300
G125	Bromobenzene	ug/L	1	G2	5			< 5
G125	Bromochloromethane	ug/L	1	G2	5			< 5
G125	Bromodichloromethane	ug/L	1	G2	5			< 1
G125	Bromoform	ug/L	1	G2	5			< 1
G125	Bromomethane	ug/L	1	G2	5			< 5
G125	Cadmium, dissolved	ug/L	1	G1	68	62.82	50	< 1
G125	Cadmium, total	ug/L	1		11	36.39	50	< 1
G125	Calcium, total	mg/L	1		228	897.24		723
G125	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
G125	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
G125	Chemical Oxygen Demand	mg/L	1		97	50.54		56
G125	Chloride, dissolved	mg/L	1	G1	276	416.03		214
G125	Chloride, total	mg/L	1		292	364.96		209
G125	Chlorobenzene	ug/L	1	G2	5		500	< 5
G125	Chloroethane	ug/L	1	G2	10			< 10
G125	Chloroform	ug/L	1	G2	5		350	< 1
G125	Chloromethane	ug/L	1	G2	10			< 10
G125	Chromium, dissolved	ug/L	1	G1	3	1	1000	< 1
G125	Chromium, total	ug/L	1		390	59.08	1000	4
G125	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
G125	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
G125	Cobalt, total	ug/L	1		45	41.41	1000	4
G125	Copper, total	ug/L	1		140	175.1	650	12
G125	Cyanide, total	mg/L	1	G1	0.005	0.01	0.6	< 0.005
G125	Dibenzofuran	ug/L	1					< 10
G125	Dibromochloromethane	ug/L	1	G2	5			< 1
G125	Dibromomethane	ug/L	1	G2	5			< 5
G125	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
G125	Ethylbenzene	ug/L	1	G2	5		1000	< 5
G125	Fluoranthene	ug/L	1				1400	< 10
G125	Fluorene	ug/L	1				1400	< 10
G125	Hexachlorobutadiene	ug/L	1	G2	10			< 10
G125	Iodomethane	ug/L	1	G2	5			< 5
G125	Iron, total	ug/L	1		20654000	400682		54700
G125	Isophorone	ug/L	1		10			< 10
G125	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
G125	Lead, dissolved	ug/L	1	G1	16	34.98	100	< 2
G125	Lead, total	ug/L	1		105	118.25	100	13
G125	Magnesium, dissolved	mg/L	1	G1	30.9	145.7		137
G125	Magnesium, total	mg/L	1		43.52	226.99		251
G125	Manganese, total	ug/L	1		2150	3941.26		626
G125	Mercury, dissolved	ug/L	1	G1	0.2	0.2	10	< 0.2
G125	Methylene Chloride	ug/L	1	G2	5		50	< 5
G125	m-Xylene	ug/L	1		5			< 5
G125	Naphthalene	ug/L	1	G2	10		220	< 10
G125	n-Butylbenzene	ug/L	1	G2	5			< 5
G125	Nickel, total	ug/L	1		1410	126.41	2000	16
G125	Nitrate as N, dissolved	mg/L	1	G1	1.37	0.1	100	< 0.1
G125	Nitrate as N, total	mg/L	1		0.88	0.46	100	< 0.1
G125	n-Propylbenzene	ug/L	1	G2	5			< 5
G125	Oil (Hexane Soluble)	mg/L	1	G2	13	1		< 1
G125	o-Xylene	ug/L	1		5			< 5
G125	pH (field)	SU	1	G1	7.56 - 8.21	4.4 - 8.37		6.47
G125	Phenanthrene	ug/L	1					< 10
G125	Phenolics	ug/L	1	G2	10	10	100	< 10
G125	p-Isopropyltoluene	ug/L	1	G2	5			< 5
G125	Potassium, total	mg/L	1		36	108.59		50
G125	p-Xylene	ug/L	1		5			< 5
G125	Pyrene	ug/L	1				1050	< 10
G125	sec-Butylbenzene	ug/L	1	G2	5			< 5
G125	Selenium, total	ug/L	1		9	2	50	< 2
G125	Silver, total	ug/L	1		1	1		< 1
G125	Sodium, total	mg/L	1		479.8	280.96		313
G125	Specific Conductance (field)	umhos/cm	1	G1	2578			1016
G125	Styrene	ug/L	1	G2	5		500	< 5

Notes:
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EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
G125	Sulfate, dissolved	mg/L	1	G1	79	3416.62		210
G125	Sulfate, total	mg/L	1		79	2932.55		290
G125	tert-Butylbenzene	ug/L	1	G2	5			< 5
G125	Tetrachloroethene	ug/L	1	G2	5		25	< 5
G125	Tetrahydrofuran	ug/L	1	G2	5			< 5
G125	Tin, total	ug/L	1					< 20
G125	Toluene	ug/L	1	G2	5		2500	< 5
G125	Total Dissolved Solids	mg/L	1	G1	1421	3720	1200	1650
G125	Total Organic Carbon	mg/L	1		11.9	36.6		18.8
G125	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
G125	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
G125	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 5
G125	Trichloroethene	ug/L	1	G2	5		25	< 5
G125	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
G125	Vanadium, total	ug/L	1		140	102.86	100	< 10
G125	Vinyl Acetate	ug/L	1	G2	10			< 5
G125	Vinyl Chloride	ug/L	1	G2	10		10	< 2
G125	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
G125	Zinc, dissolved	ug/L	1	G1	9	36.46	10000	< 5
G125	Zinc, total	ug/L	1		760	422.82	10000	34
G130	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
G130	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
G130	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
G130	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
G130	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
G130	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
G130	1,1-Dichloropropene	ug/L	1	G2	5			< 5
G130	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
G130	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
G130	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
G130	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
G130	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
G130	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
G130	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
G130	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
G130	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
G130	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
G130	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
G130	1,3-Dichloropropane	ug/L	1	G2	5			< 5
G130	1,3-Dichloropropene	ug/L	1	G2	5			< 5
G130	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
G130	2,2-Dichloropropane	ug/L	1	G2	5			< 5
G130	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
G130	2-Chlorotoluene	ug/L	1	G2	5			< 5
G130	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
G130	4-Chlorotoluene	ug/L	1	G2	5			< 5
G130	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
G130	Acetone	ug/L	1	G2	10		6300	< 10
G130	Acrylonitrile	ug/L	1	G2	100			< 100
G130	Ammonia as N, Diss.	mg/L	1	G1	1.82			< 0.1
G130	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
G130	Benzene	ug/L	1	G2	5		25	< 5
G130	Boron, dissolved	ug/L	1	G1	1901	136.6	2000	30
G130	Bromobenzene	ug/L	1	G2	5			< 5
G130	Bromochloromethane	ug/L	1	G2	5			< 5
G130	Bromodichloromethane	ug/L	1	G2	5			< 5
G130	Bromoform	ug/L	1	G2	5			< 5
G130	Bromomethane	ug/L	1	G2	5			< 5
G130	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
G130	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
G130	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
G130	Chloride, dissolved	mg/L	1	G1	276			7
G130	Chlorobenzene	ug/L	1	G2	5		500	< 5
G130	Chloroethane	ug/L	1	G2	10			< 10
G130	Chloroform	ug/L	1	G2	5		350	< 5
G130	Chloromethane	ug/L	1	G2	10			< 10
G130	Chromium, dissolved	ug/L	1	G1	3	1	1000	< 1

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or
Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
G130	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
G130	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
G130	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
G130	Dibromochloromethane	ug/L	1	G2	5			< 5
G130	Dibromomethane	ug/L	1	G2	5			< 5
G130	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
G130	Ethylbenzene	ug/L	1	G2	5		1000	< 5
G130	Hexachlorobutadiene	ug/L	1	G2	10			< 10
G130	Iodomethane	ug/L	1	G2	5			< 5
G130	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
G130	Lead, dissolved	ug/L	1	G1	16		100	< 2
G130	Magnesium, dissolved	mg/L	1	G1	30.9	32.92		11.5
G130	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
G130	Methylene Chloride	ug/L	1	G2	5		50	< 5
G130	Naphthalene	ug/L	1	G2	10		220	< 5
G130	n-Butylbenzene	ug/L	1	G2	5			< 5
G130	Nitrate as N, dissolved	mg/L	1	G1	1.37	1.37	100	< 0.1
G130	n-Propylbenzene	ug/L	1	G2	5			< 5
G130	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
G130	pH (field)	SU	1	G1	7.56 - 8.21			7.26
G130	Phenolics	ug/L	1	G2	10		100	< 10
G130	p-Isopropyltoluene	ug/L	1	G2	5			< 5
G130	sec-Butylbenzene	ug/L	1	G2	5			< 5
G130	Specific Conductance (field)	umhos/cm	1	G1	2578			368
G130	Styrene	ug/L	1	G2	5		500	< 5
G130	Sulfate, dissolved	mg/L	1	G1	79			21
G130	tert-Butylbenzene	ug/L	1	G2	5			< 5
G130	Tetrachloroethene	ug/L	1	G2	5		25	< 5
G130	Tetrahydrofuran	ug/L	1	G2	5			< 5
G130	Toluene	ug/L	1	G2	5		2500	< 5
G130	Total Dissolved Solids	mg/L	1	G1	1421		1200	267
G130	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
G130	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
G130	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
G130	Trichloroethene	ug/L	1	G2	5		25	< 5
G130	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
G130	Vinyl Acetate	ug/L	1	G2	10			< 10
G130	Vinyl Chloride	ug/L	1	G2	10		10	< 2
G130	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
G130	Zinc, dissolved	ug/L	1	G1	9	17.99	10000	< 5
G131	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
G131	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
G131	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
G131	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
G131	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
G131	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
G131	1,1-Dichloropropene	ug/L	1	G2	5			< 5
G131	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
G131	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
G131	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
G131	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
G131	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
G131	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
G131	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
G131	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
G131	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
G131	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
G131	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
G131	1,3-Dichloropropane	ug/L	1	G2	5			< 5
G131	1,3-Dichloropropene	ug/L	1	G2	5			< 5
G131	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
G131	2,2-Dichloropropane	ug/L	1	G2	5			< 5
G131	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
G131	2-Chlorotoluene	ug/L	1	G2	5			< 5
G131	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
G131	4-Chlorotoluene	ug/L	1	G2	5			< 5
G131	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
G131	Acetone	ug/L	1	G2	10		6300	< 10
G131	Acrylonitrile	ug/L	1	G2	100			< 100
G131	Ammonia as N, Diss.	mg/L	1	G1	1.82	0.82		0.29
G131	Arsenic, dissolved	ug/L	1	G1	19	3	200	< 2
G131	Benzene	ug/L	1	G2	5		25	< 5
G131	Boron, dissolved	ug/L	1	G1	1901	60	2000	100
G131	Bromobenzene	ug/L	1	G2	5			< 5
G131	Bromochloromethane	ug/L	1	G2	5			< 5
G131	Bromodichloromethane	ug/L	1	G2	5			< 5
G131	Bromoform	ug/L	1	G2	5			< 5
G131	Bromomethane	ug/L	1	G2	5			< 5
G131	Cadmium, dissolved	ug/L	1	G1	68	1	50	< 1
G131	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
G131	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
G131	Chloride, dissolved	mg/L	1	G1	276	171.94		141
G131	Chlorobenzene	ug/L	1	G2	5		500	< 5
G131	Chloroethane	ug/L	1	G2	10			< 10
G131	Chloroform	ug/L	1	G2	5		350	< 5
G131	Chloromethane	ug/L	1	G2	10			< 10
G131	Chromium, dissolved	ug/L	1	G1	3	1	1000	< 1
G131	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
G131	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
G131	Cyanide, total	mg/L	1	G1	0.005	0.01	0.6	< 0.005
G131	Dibromochloromethane	ug/L	1	G2	5			< 5
G131	Dibromomethane	ug/L	1	G2	5			< 5
G131	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
G131	Ethylbenzene	ug/L	1	G2	5		1000	< 5
G131	Hexachlorobutadiene	ug/L	1	G2	10			< 10
G131	Iodomethane	ug/L	1	G2	5			< 5
G131	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
G131	Lead, dissolved	ug/L	1	G1	16	2	100	< 2
G131	Magnesium, dissolved	mg/L	1	G1	30.9	138.5		98.6
G131	Mercury, dissolved	ug/L	1	G1	0.2	0.2	10	< 0.2
G131	Methylene Chloride	ug/L	1	G2	5		50	< 5
G131	Naphthalene	ug/L	1	G2	10		220	< 5
G131	n-Butylbenzene	ug/L	1	G2	5			< 5
G131	Nitrate as N, dissolved	mg/L	1	G1	1.37	0.1	100	2.31
G131	n-Propylbenzene	ug/L	1	G2	5			< 5
G131	Oil (Hexane Soluble)	mg/L	1	G2	13	1		< 1
G131	pH (field)	SU	1	G1	7.56 - 8.21	6.16 - 7.8		6.79
G131	Phenolics	ug/L	1	G2	10	10	100	< 10
G131	p-Isopropyltoluene	ug/L	1	G2	5			< 5
G131	sec-Butylbenzene	ug/L	1	G2	5			< 5
G131	Specific Conductance (field)	umhos/cm	1	G1	2578			825
G131	Styrene	ug/L	1	G2	5		500	< 5
G131	Sulfate, dissolved	mg/L	1	G1	79	996.83		58
G131	tert-Butylbenzene	ug/L	1	G2	5			< 5
G131	Tetrachloroethene	ug/L	1	G2	5		25	< 5
G131	Tetrahydrofuran	ug/L	1	G2	5			< 5
G131	Toluene	ug/L	1	G2	5		2500	< 5
G131	Total Dissolved Solids	mg/L	1	G1	1421	2505.16	1200	1150
G131	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
G131	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
G131	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
G131	Trichloroethene	ug/L	1	G2	5		25	< 5
G131	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
G131	Vinyl Acetate	ug/L	1	G2	10			< 10
G131	Vinyl Chloride	ug/L	1	G2	10		10	< 2
G131	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
G131	Zinc, dissolved	ug/L	1	G1	9	26	10000	< 5
G133	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
G133	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
G133	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
G133	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
G133	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
G133	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
G133	1,1-Dichloropropene	ug/L	1	G2	5			< 5

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
G133	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
G133	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
G133	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
G133	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
G133	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
G133	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
G133	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
G133	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
G133	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
G133	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
G133	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
G133	1,3-Dichloropropane	ug/L	1	G2	5			< 5
G133	1,3-Dichloropropene	ug/L	1	G2	5			< 5
G133	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
G133	2,2-Dichloropropane	ug/L	1	G2	5			< 5
G133	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
G133	2-Chlorotoluene	ug/L	1	G2	5			< 5
G133	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
G133	4-Chlorotoluene	ug/L	1	G2	5			< 5
G133	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
G133	Acetone	ug/L	1	G2	10		6300	< 10
G133	Acrylonitrile	ug/L	1	G2	100			< 100
G133	Ammonia as N, Diss.	mg/L	1	G1	1.82			0.2
G133	Arsenic, dissolved	ug/L	1	G1	19		200	18
G133	Benzene	ug/L	1	G2	5		25	< 5
G133	Boron, dissolved	ug/L	1	G1	1901	2417	2000	620
G133	Bromobenzene	ug/L	1	G2	5			< 5
G133	Bromochloromethane	ug/L	1	G2	5			< 5
G133	Bromodichloromethane	ug/L	1	G2	5			< 5
G133	Bromoform	ug/L	1	G2	5			< 5
G133	Bromomethane	ug/L	1	G2	5			< 5
G133	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
G133	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
G133	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
G133	Chloride, dissolved	mg/L	1	G1	276			34
G133	Chlorobenzene	ug/L	1	G2	5		500	< 5
G133	Chloroethane	ug/L	1	G2	10			< 10
G133	Chloroform	ug/L	1	G2	5		350	< 5
G133	Chloromethane	ug/L	1	G2	10			< 10
G133	Chromium, dissolved	ug/L	1	G1	3	3	1000	< 1
G133	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
G133	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
G133	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
G133	Dibromochloromethane	ug/L	1	G2	5			< 5
G133	Dibromomethane	ug/L	1	G2	5			< 5
G133	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
G133	Ethylbenzene	ug/L	1	G2	5		1000	< 5
G133	Hexachlorobutadiene	ug/L	1	G2	10			< 10
G133	Iodomethane	ug/L	1	G2	5			< 5
G133	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
G133	Lead, dissolved	ug/L	1	G1	16		100	< 2
G133	Magnesium, dissolved	mg/L	1	G1	30.9	28.69		17.3
G133	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
G133	Methylene Chloride	ug/L	1	G2	5		50	< 5
G133	Naphthalene	ug/L	1	G2	10		220	< 5
G133	n-Butylbenzene	ug/L	1	G2	5			< 5
G133	Nitrate as N, dissolved	mg/L	1	G1	1.37	0.1	100	< 0.1
G133	n-Propylbenzene	ug/L	1	G2	5			< 5
G133	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
G133	pH (field)	SU	1	G1	7.56 - 8.21			6.98
G133	Phenolics	ug/L	1	G2	10		100	< 10
G133	p-Isopropyltoluene	ug/L	1	G2	5			< 5
G133	sec-Butylbenzene	ug/L	1	G2	5			< 5
G133	Specific Conductance (field)	umhos/cm	1	G1	2578			721
G133	Styrene	ug/L	1	G2	5		500	< 5
G133	Sulfate, dissolved	mg/L	1	G1	79			89
G133	tert-Butylbenzene	ug/L	1	G2	5			< 5

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV		2Q13
G133	Tetrachloroethene	ug/L	1	G2	5		25	<	5
G133	Tetrahydrofuran	ug/L	1	G2	5			<	5
G133	Toluene	ug/L	1	G2	5		2500	<	5
G133	Total Dissolved Solids	mg/L	1	G1	1421		1200		563
G133	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	<	5
G133	trans-1,3-Dichloropropene	ug/L	1	G2	5			<	5
G133	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			<	20
G133	Trichloroethene	ug/L	1	G2	5		25	<	5
G133	Trichlorofluoromethane	ug/L	1	G2	5		10500	<	5
G133	Vinyl Acetate	ug/L	1	G2	10			<	10
G133	Vinyl Chloride	ug/L	1	G2	10		10	<	2
G133	Xylenes (Total)	ug/L	1	G2	5		10000	<	5
G133	Zinc, dissolved	ug/L	1	G1	9	9	10000	<	5
G134	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			<	5
G134	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	<	5
G134	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			<	5
G134	1,1,2-Trichloroethane	ug/L	1	G2	5		50	<	5
G134	1,1-Dichloroethane	ug/L	1	G2	5		7000	<	5
G134	1,1-Dichloroethene	ug/L	1	G2	5		35	<	5
G134	1,1-Dichloropropene	ug/L	1	G2	5			<	5
G134	1,2,3-Trichlorobenzene	ug/L	1	G2	5			<	5
G134	1,2,3-Trichloropropane	ug/L	1	G2	5			<	5
G134	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	<	5
G134	1,2,4-Trimethylbenzene	ug/L	1	G2	5			<	5
G134	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	<	5
G134	1,2-Dibromoethane	ug/L	1	G2	10		0.5	<	5
G134	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	<	5
G134	1,2-Dichloroethane	ug/L	1	G2	5		25	<	5
G134	1,2-Dichloropropane	ug/L	1	G2	5		25	<	5
G134	1,3,5-Trimethylbenzene	ug/L	1	G2	5			<	5
G134	1,3-Dichlorobenzene	ug/L	1	G2	10			<	5
G134	1,3-Dichloropropane	ug/L	1	G2	5			<	5
G134	1,3-Dichloropropene	ug/L	1	G2	5			<	5
G134	1,4-Dichlorobenzene	ug/L	1	G2	10		375	<	5
G134	2,2-Dichloropropane	ug/L	1	G2	5			<	5
G134	2-Butanone (MEK)	ug/L	1	G2	10		4200	<	10
G134	2-Chlorotoluene	ug/L	1	G2	5			<	5
G134	2-Hexanone (MBK)	ug/L	1	G2	5			<	10
G134	4-Chlorotoluene	ug/L	1	G2	5			<	5
G134	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			<	10
G134	Acetone	ug/L	1	G2	10		6300	<	10
G134	Acrylonitrile	ug/L	1	G2	100			<	100
G134	Ammonia as N, Diss.	mg/L	1	G1	1.82				0.38
G134	Arsenic, dissolved	ug/L	1	G1	19		200		5
G134	Benzene	ug/L	1	G2	5		25	<	5
G134	Boron, dissolved	ug/L	1	G1	1901	2056	2000		130
G134	Bromobenzene	ug/L	1	G2	5			<	5
G134	Bromochloromethane	ug/L	1	G2	5			<	5
G134	Bromodichloromethane	ug/L	1	G2	5			<	5
G134	Bromoform	ug/L	1	G2	5			<	5
G134	Bromomethane	ug/L	1	G2	5			<	5
G134	Cadmium, dissolved	ug/L	1	G1	68		50	<	1
G134	Carbon Disulfide	ug/L	1	G2	5		3500	<	5
G134	Carbon Tetrachloride	ug/L	1	G2	5		25	<	5
G134	Chloride, dissolved	mg/L	1	G1	276				16
G134	Chlorobenzene	ug/L	1	G2	5		500	<	5
G134	Chloroethane	ug/L	1	G2	10			<	10
G134	Chloroform	ug/L	1	G2	5		350	<	5
G134	Chloromethane	ug/L	1	G2	10			<	10
G134	Chromium, dissolved	ug/L	1	G1	3	1	1000	<	1
G134	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	<	5
G134	cis-1,3-Dichloropropene	ug/L	1	G2	5			<	5
G134	Cyanide, total	mg/L	1	G1	0.005		0.6	<	0.005
G134	Dibromochloromethane	ug/L	1	G2	5			<	5
G134	Dibromomethane	ug/L	1	G2	5			<	5
G134	Dichlorodifluoromethane	ug/L	1	G2	5		7000	<	5
G134	Ethylbenzene	ug/L	1	G2	5		1000	<	5

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13	
G134	Hexachlorobutadiene	ug/L	1	G2	10			<	10
G134	Iodomethane	ug/L	1	G2	5			<	5
G134	Isopropylbenzene	ug/L	1	G2	5		3500	<	5
G134	Lead, dissolved	ug/L	1	G1	16		100	<	2
G134	Magnesium, dissolved	mg/L	1	G1	30.9	39.61			109
G134	Mercury, dissolved	ug/L	1	G1	0.2		10	<	0.2
G134	Methylene Chloride	ug/L	1	G2	5		50	<	5
G134	Naphthalene	ug/L	1	G2	10		220	<	5
G134	n-Butylbenzene	ug/L	1	G2	5			<	5
G134	Nitrate as N, dissolved	mg/L	1	G1	1.37	0.1	100	<	0.1
G134	n-Propylbenzene	ug/L	1	G2	5			<	5
G134	Oil (Hexane Soluble)	mg/L	1	G2	13			<	1
G134	pH (field)	SU	1	G1	7.56 - 8.21				6.75
G134	Phenolics	ug/L	1	G2	10		100	<	10
G134	p-Isopropyltoluene	ug/L	1	G2	5			<	5
G134	sec-Butylbenzene	ug/L	1	G2	5			<	5
G134	Specific Conductance (field)	umhos/cm	1	G1	2578				883
G134	Styrene	ug/L	1	G2	5		500	<	5
G134	Sulfate, dissolved	mg/L	1	G1	79				335
G134	tert-Butylbenzene	ug/L	1	G2	5			<	5
G134	Tetrachloroethene	ug/L	1	G2	5		25	<	5
G134	Tetrahydrofuran	ug/L	1	G2	5			<	5
G134	Toluene	ug/L	1	G2	5		2500	<	5
G134	Total Dissolved Solids	mg/L	1	G1	1421		1200		1360
G134	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	<	5
G134	trans-1,3-Dichloropropene	ug/L	1	G2	5			<	5
G134	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			<	20
G134	Trichloroethene	ug/L	1	G2	5		25	<	5
G134	Trichlorofluoromethane	ug/L	1	G2	5		10500	<	5
G134	Vinyl Acetate	ug/L	1	G2	10			<	10
G134	Vinyl Chloride	ug/L	1	G2	10		10	<	2
G134	Xylenes (Total)	ug/L	1	G2	5		10000	<	5
G134	Zinc, dissolved	ug/L	1	G1	9	5	10000	<	5
R103	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			<	5
R103	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	<	5
R103	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			<	5
R103	1,1,2-Trichloroethane	ug/L	1	G2	5		50	<	5
R103	1,1-Dichloroethane	ug/L	1	G2	5		7000	<	5
R103	1,1-Dichloroethene	ug/L	1	G2	5		35	<	5
R103	1,1-Dichloropropene	ug/L	1	G2	5			<	5
R103	1,2,3-Trichlorobenzene	ug/L	1	G2	5			<	5
R103	1,2,3-Trichloropropane	ug/L	1	G2	5			<	5
R103	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	<	5
R103	1,2,4-Trimethylbenzene	ug/L	1	G2	5			<	5
R103	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	<	5
R103	1,2-Dibromoethane	ug/L	1	G2	10		0.5	<	5
R103	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	<	5
R103	1,2-Dichloroethane	ug/L	1	G2	5		25	<	5
R103	1,2-Dichloropropane	ug/L	1	G2	5		25	<	5
R103	1,3,5-Trimethylbenzene	ug/L	1	G2	5			<	5
R103	1,3-Dichlorobenzene	ug/L	1	G2	10			<	5
R103	1,3-Dichloropropane	ug/L	1	G2	5			<	5
R103	1,3-Dichloropropene	ug/L	1	G2	5			<	5
R103	1,4-Dichlorobenzene	ug/L	1	G2	10		375	<	5
R103	2,2-Dichloropropane	ug/L	1	G2	5			<	5
R103	2-Butanone (MEK)	ug/L	1	G2	10		4200	<	10
R103	2-Chlorotoluene	ug/L	1	G2	5			<	5
R103	2-Hexanone (MBK)	ug/L	1	G2	5			<	10
R103	4-Chlorotoluene	ug/L	1	G2	5			<	5
R103	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			<	10
R103	Acetone	ug/L	1	G2	10		6300	<	10
R103	Acrylonitrile	ug/L	1	G2	100			<	100
R103	Ammonia as N, Diss.	mg/L	1	G1	1.25			<	0.1
R103	Arsenic, dissolved	ug/L	1	G1	4		200	<	2
R103	Benzene	ug/L	1	G2	5		25	<	5
R103	Boron, dissolved	ug/L	1	G1	179.1	179.1	2000		60
R103	Bromobenzene	ug/L	1	G2	5			<	5

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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
R103	Bromochloromethane	ug/L	1	G2	5			< 5
R103	Bromodichloromethane	ug/L	1	G2	5			< 5
R103	Bromoform	ug/L	1	G2	5			< 5
R103	Bromomethane	ug/L	1	G2	5			< 5
R103	Cadmium, dissolved	ug/L	1	G1	1		50	< 1
R103	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
R103	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
R103	Chloride, dissolved	mg/L	1	G1	19		200	9
R103	Chlorobenzene	ug/L	1	G2	5		500	< 5
R103	Chloroethane	ug/L	1	G2	10			< 10
R103	Chloroform	ug/L	1	G2	5		350	< 5
R103	Chloromethane	ug/L	1	G2	10			< 10
R103	Chromium, dissolved	ug/L	1	G1	2	2	1000	< 1
R103	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
R103	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
R103	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
R103	Dibromochloromethane	ug/L	1	G2	5			< 5
R103	Dibromomethane	ug/L	1	G2	5			< 5
R103	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
R103	Ethylbenzene	ug/L	1	G2	5		1000	< 5
R103	Hexachlorobutadiene	ug/L	1	G2	10			< 10
R103	Iodomethane	ug/L	1	G2	5			< 5
R103	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
R103	Lead, dissolved	ug/L	1	G1	2000		100	< 2
R103	Magnesium, dissolved	mg/L	1	G1	185.9	185.9		123
R103	Mercury, dissolved	ug/L	1	G1	200		10	< 0.2
R103	Methylene Chloride	ug/L	1	G2	5		50	< 5
R103	Naphthalene	ug/L	1	G2	10		220	< 5
R103	n-Butylbenzene	ug/L	1	G2	5			< 5
R103	Nitrate as N, dissolved	mg/L	1	G1	0.1	0.1	100	< 0.1
R103	n-Propylbenzene	ug/L	1	G2	5			< 5
R103	Oil (Hexane Soluble)	mg/L	1	G2	3			< 1
R103	pH (field)	SU	1	G1	7.38 - 7.61		6.5 - 9	6.73
R103	Phenolics	ug/L	1	G2	10	37.57	100	< 10
R103	p-Isopropyltoluene	ug/L	1	G2	5			< 5
R103	sec-Butylbenzene	ug/L	1	G2	5			< 5
R103	Specific Conductance (field)	umhos/cm	1	G1				745
R103	Styrene	ug/L	1	G2			500	< 5
R103	Sulfate, dissolved	mg/L	1	G1	293	943.2	400	570
R103	tert-Butylbenzene	ug/L	1	G2	5			< 5
R103	Tetrachloroethene	ug/L	1	G2	5		25	< 5
R103	Tetrahydrofuran	ug/L	1	G2	5			< 5
R103	Toluene	ug/L	1	G2	5		2500	< 5
R103	Total Dissolved Solids	mg/L	1	G1	1470	1870	1200	1580
R103	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
R103	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
R103	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
R103	Trichloroethene	ug/L	1	G2	5		25	< 5
R103	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
R103	Vinyl Acetate	ug/L	1	G2	10			< 10
R103	Vinyl Chloride	ug/L	1	G2	10		10	< 2
R103	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
R103	Zinc, dissolved	ug/L	1	G1	25	25	10000	< 5
R106	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
R106	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
R106	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
R106	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
R106	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
R106	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
R106	1,1-Dichloropropene	ug/L	1	G2	5			< 5
R106	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
R106	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
R106	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
R106	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
R106	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
R106	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
R106	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5

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EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
R106	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
R106	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
R106	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
R106	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
R106	1,3-Dichloropropane	ug/L	1	G2	5			< 5
R106	1,3-Dichloropropene	ug/L	1	G2	5			< 5
R106	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
R106	2,2-Dichloropropane	ug/L	1	G2	5			< 5
R106	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
R106	2-Chlorotoluene	ug/L	1	G2	5			< 5
R106	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
R106	4-Chlorotoluene	ug/L	1	G2	5			< 5
R106	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
R106	Acetone	ug/L	1	G2	10		6300	< 10
R106	Acrylonitrile	ug/L	1	G2	100			< 100
R106	Ammonia as N, Diss.	mg/L	1	G1	1.82	1.01		< 0.1
R106	Arsenic, dissolved	ug/L	1	G1	19	18	200	< 2
R106	Benzene	ug/L	1	G2	5		25	< 5
R106	Boron, dissolved	ug/L	1	G1	1901	244.7	2000	100
R106	Bromobenzene	ug/L	1	G2	5			< 5
R106	Bromochloromethane	ug/L	1	G2	5			< 5
R106	Bromodichloromethane	ug/L	1	G2	5			< 5
R106	Bromoform	ug/L	1	G2	5			< 5
R106	Bromomethane	ug/L	1	G2	5			< 5
R106	Cadmium, dissolved	ug/L	1	G1	68	1	50	< 1
R106	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
R106	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
R106	Chloride, dissolved	mg/L	1	G1	276	69		12
R106	Chlorobenzene	ug/L	1	G2	5		500	< 5
R106	Chloroethane	ug/L	1	G2	10			< 10
R106	Chloroform	ug/L	1	G2	5		350	< 5
R106	Chloromethane	ug/L	1	G2	10			< 10
R106	Chromium, dissolved	ug/L	1	G1	3	1	1000	< 1
R106	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
R106	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
R106	Cyanide, total	mg/L	1	G1	0.005	0.005	0.6	< 0.005
R106	Dibromochloromethane	ug/L	1	G2	5			< 5
R106	Dibromomethane	ug/L	1	G2	5			< 5
R106	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
R106	Ethylbenzene	ug/L	1	G2	5		1000	< 5
R106	Hexachlorobutadiene	ug/L	1	G2	10			< 10
R106	Iodomethane	ug/L	1	G2	5			< 5
R106	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
R106	Lead, dissolved	ug/L	1	G1	16	2	100	< 2
R106	Magnesium, dissolved	mg/L	1	G1	30.9	199.6		152
R106	Mercury, dissolved	ug/L	1	G1	0.2	0.2	10	< 0.2
R106	Methylene Chloride	ug/L	1	G2	5		50	< 5
R106	Naphthalene	ug/L	1	G2	10		220	< 5
R106	n-Butylbenzene	ug/L	1	G2	5			< 5
R106	Nitrate as N, dissolved	mg/L	1	G1	1.37	0.1	100	< 0.1
R106	n-Propylbenzene	ug/L	1	G2	5			< 5
R106	Oil (Hexane Soluble)	mg/L	1	G2	13	1		< 1
R106	pH (field)	SU	1	G1	7.56 - 8.21	5.87 - 9.58		6.86
R106	Phenolics	ug/L	1	G2	10	10	100	< 10
R106	p-Isopropyltoluene	ug/L	1	G2	5			< 5
R106	sec-Butylbenzene	ug/L	1	G2	5			< 5
R106	Specific Conductance (field)	umhos/cm	1	G1	2578			2218
R106	Styrene	ug/L	1	G2	5		500	< 5
R106	Sulfate, dissolved	mg/L	1	G1	79	3289		1260
R106	tert-Butylbenzene	ug/L	1	G2	5			< 5
R106	Tetrachloroethene	ug/L	1	G2	5		25	< 5
R106	Tetrahydrofuran	ug/L	1	G2	5			< 5
R106	Toluene	ug/L	1	G2	5		2500	< 5
R106	Total Dissolved Solids	mg/L	1	G1	1421	2989	1200	2200
R106	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
R106	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
R106	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20

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EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
R106	Trichloroethene	ug/L	1	G2	5		25	< 5
R106	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
R106	Vinyl Acetate	ug/L	1	G2	10			< 10
R106	Vinyl Chloride	ug/L	1	G2	10		10	< 2
R106	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
R106	Zinc, dissolved	ug/L	1	G1	9	9	10000	15
R123	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
R123	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
R123	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
R123	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
R123	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
R123	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
R123	1,1-Dichloropropene	ug/L	1	G2	5			< 5
R123	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
R123	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
R123	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
R123	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
R123	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
R123	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
R123	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
R123	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
R123	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
R123	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
R123	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
R123	1,3-Dichloropropane	ug/L	1	G2	5			< 5
R123	1,3-Dichloropropene	ug/L	1	G2	5			< 5
R123	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
R123	2,2-Dichloropropane	ug/L	1	G2	5			< 5
R123	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
R123	2-Chlorotoluene	ug/L	1	G2	5			< 5
R123	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
R123	4-Chlorotoluene	ug/L	1	G2	5			< 5
R123	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
R123	Acetone	ug/L	1	G2	10		6300	< 10
R123	Acrylonitrile	ug/L	1	G2	100			< 100
R123	Ammonia as N, Diss.	mg/L	1	G1	1.82	1.28		7.28
R123	Arsenic, dissolved	ug/L	1	G1	19	2	200	< 2
R123	Benzene	ug/L	1	G2	5		25	< 5
R123	Boron, dissolved	ug/L	1	G1	1901	984.3	2000	880
R123	Bromobenzene	ug/L	1	G2	5			< 5
R123	Bromochloromethane	ug/L	1	G2	5			< 5
R123	Bromodichloromethane	ug/L	1	G2	5			< 5
R123	Bromoform	ug/L	1	G2	5			< 5
R123	Bromomethane	ug/L	1	G2	5			< 5
R123	Cadmium, dissolved	ug/L	1	G1	68	1	50	< 1
R123	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
R123	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
R123	Chloride, dissolved	mg/L	1	G1	276	274.64		460
R123	Chlorobenzene	ug/L	1	G2	5		500	< 5
R123	Chloroethane	ug/L	1	G2	10			< 10
R123	Chloroform	ug/L	1	G2	5		350	< 5
R123	Chloromethane	ug/L	1	G2	10			< 10
R123	Chromium, dissolved	ug/L	1	G1	3	3	1000	3
R123	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
R123	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
R123	Cyanide, total	mg/L	1	G1	0.005	0.01	0.6	< 0.005
R123	Dibromochloromethane	ug/L	1	G2	5			< 5
R123	Dibromomethane	ug/L	1	G2	5			< 5
R123	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
R123	Ethylbenzene	ug/L	1	G2	5		1000	< 5
R123	Hexachlorobutadiene	ug/L	1	G2	10			< 10
R123	Iodomethane	ug/L	1	G2	5			< 5
R123	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
R123	Lead, dissolved	ug/L	1	G1	16	2	100	< 2
R123	Magnesium, dissolved	mg/L	1	G1	30.9	616.9		153
R123	Mercury, dissolved	ug/L	1	G1	0.2	0.2	10	< 0.2
R123	Methylene Chloride	ug/L	1	G2	5		50	< 5

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV		2Q13
R123	Naphthalene	ug/L	1	G2	10		220	<	5
R123	n-Butylbenzene	ug/L	1	G2	5			<	5
R123	Nitrate as N, dissolved	mg/L	1	G1	1.37	0.1	100	<	0.1
R123	n-Propylbenzene	ug/L	1	G2	5			<	5
R123	Oil (Hexane Soluble)	mg/L	1	G2	13	1		<	1
R123	pH (field)	SU	1	G1	7.56 - 8.21	6.43 - 7.39			6.53
R123	Phenolics	ug/L	1	G2	10		100	<	10
R123	p-Isopropyltoluene	ug/L	1	G2	5			<	5
R123	sec-Butylbenzene	ug/L	1	G2	5			<	5
R123	Specific Conductance (field)	umhos/cm	1	G1	2578				1062
R123	Styrene	ug/L	1	G2	5		500	<	5
R123	Sulfate, dissolved	mg/L	1	G1	79	1076.03			460
R123	tert-Butylbenzene	ug/L	1	G2	5			<	5
R123	Tetrachloroethene	ug/L	1	G2	5		25	<	5
R123	Tetrahydrofuran	ug/L	1	G2	5			<	5
R123	Toluene	ug/L	1	G2	5		2500	<	5
R123	Total Dissolved Solids	mg/L	1	G1	1421	3327.07	1200		2600
R123	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	<	5
R123	trans-1,3-Dichloropropene	ug/L	1	G2	5			<	5
R123	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			<	20
R123	Trichloroethene	ug/L	1	G2	5		25	<	5
R123	Trichlorofluoromethane	ug/L	1	G2	5		10500	<	5
R123	Vinyl Acetate	ug/L	1	G2	10			<	10
R123	Vinyl Chloride	ug/L	1	G2	10		10	<	2
R123	Xylenes (Total)	ug/L	1	G2	5		10000	<	5
R123	Zinc, dissolved	ug/L	1	G1	9	25.51	10000	<	5
R124	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			<	5
R124	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	<	5
R124	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			<	5
R124	1,1,2-Trichloroethane	ug/L	1	G2	5		50	<	5
R124	1,1-Dichloroethane	ug/L	1	G2	5		7000	<	5
R124	1,1-Dichloroethene	ug/L	1	G2	5		35	<	5
R124	1,1-Dichloropropene	ug/L	1	G2	5			<	5
R124	1,2,3-Trichlorobenzene	ug/L	1	G2	5			<	5
R124	1,2,3-Trichloropropane	ug/L	1	G2	5			<	5
R124	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	<	5
R124	1,2,4-Trimethylbenzene	ug/L	1	G2	5			<	5
R124	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	<	10
R124	1,2-Dibromoethane	ug/L	1	G2	10		0.5	<	5
R124	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	<	10
R124	1,2-Dichloroethane	ug/L	1	G2	5		25	<	5
R124	1,2-Dichloropropane	ug/L	1	G2	5		25	<	5
R124	1,3,5-Trimethylbenzene	ug/L	1	G2	5			<	5
R124	1,3-Dichlorobenzene	ug/L	1	G2	10			<	10
R124	1,3-Dichloropropane	ug/L	1	G2	5			<	5
R124	1,3-Dichloropropene	ug/L	1	G2	5			<	5
R124	1,4-Dichlorobenzene	ug/L	1	G2	10		375	<	10
R124	2,2-Dichloropropane	ug/L	1	G2	5			<	5
R124	2,4-Dimethylphenol	ug/L	1					<	10
R124	2-Butanone (MEK)	ug/L	1	G2	10		4200	<	10
R124	2-Chlorotoluene	ug/L	1	G2	5			<	5
R124	2-Hexanone (MBK)	ug/L	1	G2	5			<	10
R124	2-Methylnaphthalene	ug/L	1				140	<	10
R124	4-Chlorotoluene	ug/L	1	G2	5			<	5
R124	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			<	10
R124	Acenaphthene	ug/L	1				2100	<	10
R124	Acenaphthylene	ug/L	1					<	10
R124	Acetone	ug/L	1	G2	10		6300	<	10
R124	Acrylonitrile	ug/L	1	G2	100			<	100
R124	Aluminum, total	ug/L	1		162000	16134.75		<	50
R124	Ammonia as N, Diss.	mg/L	1	G1	1.82	64.04			62.4
R124	Ammonia as N, total	mg/L	1		1.75	53.5			60.9
R124	Anthracene	ug/L	1				10500	<	10
R124	Antimony, total	ug/L	1		10	10	24	<	6
R124	Arsenic, dissolved	ug/L	1	G1	19	5	200	<	2
R124	Arsenic, total	ug/L	1		27	57.82	200	<	2
R124	Barium, total	ug/L	1		1920	876.43	2000		174

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
R124	Benzene	ug/L	1	G2	5		25	< 5
R124	Benzoic Acid	ug/L	1				28000	< 50
R124	Beryllium, total	ug/L	1		9.7	1	500	< 1
R124	Biochemical Oxygen Demand	mg/L	1		34.3	70.12		12
R124	bis(2-ethylhexyl)phthalate	ug/L	1				60	< 10
R124	Boron, dissolved	ug/L	1	G1	1901	2125	2000	2620
R124	Boron, total	ug/L	1		1200	1230	2000	2450
R124	Bromobenzene	ug/L	1	G2	5			< 5
R124	Bromochloromethane	ug/L	1	G2	5			< 5
R124	Bromodichloromethane	ug/L	1	G2	5			< 5
R124	Bromoform	ug/L	1	G2	5			< 5
R124	Bromomethane	ug/L	1	G2	5			< 5
R124	Cadmium, dissolved	ug/L	1	G1	68	3	50	< 1
R124	Cadmium, total	ug/L	1		11	10.05	50	< 1
R124	Calcium, total	mg/L	1		228	279.16		555
R124	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
R124	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
R124	Chemical Oxygen Demand	mg/L	1		97	116		139
R124	Chloride, dissolved	mg/L	1	G1	276	379.2		280
R124	Chloride, total	mg/L	1		292	354.64		260
R124	Chlorobenzene	ug/L	1	G2	5		500	< 5
R124	Chloroethane	ug/L	1	G2	10			< 10
R124	Chloroform	ug/L	1	G2	5		350	< 1
R124	Chloromethane	ug/L	1	G2	10			< 10
R124	Chromium, dissolved	ug/L	1	G1	3	2	1000	< 1
R124	Chromium, total	ug/L	1		390	33.2	1000	< 1
R124	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
R124	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
R124	Cobalt, total	ug/L	1		45	33.24	1000	< 1
R124	Copper, total	ug/L	1		140	58.72	650	12
R124	Cyanide, total	mg/L	1	G1	0.005	0.01	0.6	< 0.005
R124	Dibenzofuran	ug/L	1					< 10
R124	Dibromochloromethane	ug/L	1	G2	5			< 1
R124	Dibromomethane	ug/L	1	G2	5			< 5
R124	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
R124	Ethylbenzene	ug/L	1	G2	5		1000	< 5
R124	Fluoranthene	ug/L	1				1400	< 10
R124	Fluorene	ug/L	1				1400	< 10
R124	Hexachlorobutadiene	ug/L	1	G2	10			< 10
R124	Iodomethane	ug/L	1	G2	5			< 5
R124	Iron, total	ug/L	1		20654000	86866.43		30600
R124	Isophorone	ug/L	1		10			< 10
R124	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
R124	Lead, dissolved	ug/L	1	G1	16	2	100	< 2
R124	Lead, total	ug/L	1		105	880.75	100	< 2
R124	Magnesium, dissolved	mg/L	1	G1	30.9	204.9		147
R124	Magnesium, total	mg/L	1		43.52	136.98		298
R124	Manganese, total	ug/L	1		2150	849.99		359
R124	Mercury, dissolved	ug/L	1	G1	0.2	0.2	10	< 0.2
R124	Methylene Chloride	ug/L	1	G2	5		50	< 5
R124	Naphthalene	ug/L	1	G2	10		220	< 10
R124	n-Butylbenzene	ug/L	1	G2	5			< 5
R124	Nickel, total	ug/L	1		1410	92.76	2000	17
R124	Nitrate as N, dissolved	mg/L	1	G1	1.37	0.1	100	< 0.1
R124	Nitrate as N, total	mg/L	1		0.88	0.51	100	0.14
R124	n-Propylbenzene	ug/L	1	G2	5			< 5
R124	Oil (Hexane Soluble)	mg/L	1	G2	13	1		< 1
R124	pH (field)	SU	1	G1	7.56 - 8.21	6.13 - 7.34		6.56
R124	Phenanthrene	ug/L	1					< 10
R124	Phenolics	ug/L	1	G2	10	10	100	< 10
R124	p-Isopropyltoluene	ug/L	1	G2	5			< 5
R124	Potassium, total	mg/L	1		36	66.99		140
R124	Pyrene	ug/L	1				1050	< 10
R124	sec-Butylbenzene	ug/L	1	G2	5			< 5
R124	Selenium, total	ug/L	1		9	2	50	< 2
R124	Silver, total	ug/L	1		1	1		< 1
R124	Sodium, total	mg/L	1		479.8	510.95		476

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
R124	Specific Conductance (field)	umhos/cm	1	G1	2578			1382
R124	Styrene	ug/L	1	G2	5		500	< 5
R124	Sulfate, dissolved	mg/L	1	G1	79	420.89		262
R124	Sulfate, total	mg/L	1		79	430.26		253
R124	tert-Butylbenzene	ug/L	1	G2	5			< 5
R124	Tetrachloroethene	ug/L	1	G2	5		25	< 5
R124	Tetrahydrofuran	ug/L	1	G2	5			< 5
R124	Thallium, total	ug/L	1		10	10	20	< 2
R124	Tin, total	ug/L	1					< 20
R124	Toluene	ug/L	1	G2	5		2500	< 5
R124	Total Dissolved Solids	mg/L	1	G1	1421	1904.15	1200	1920
R124	Total Organic Carbon	mg/L	1		11.9	128.33		62
R124	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
R124	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
R124	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 5
R124	Trichloroethene	ug/L	1	G2	5		25	< 5
R124	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
R124	Vanadium, total	ug/L	1		140	10	100	< 10
R124	Vinyl Acetate	ug/L	1	G2	10			< 10
R124	Vinyl Chloride	ug/L	1	G2	10		10	< 2
R124	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
R124	Zinc, dissolved	ug/L	1	G1	9	13	10000	< 5
R124	Zinc, total	ug/L	1		760	283.85	10000	< 5
R127	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
R127	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
R127	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
R127	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
R127	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
R127	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
R127	1,1-Dichloropropene	ug/L	1	G2	5			< 5
R127	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
R127	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
R127	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
R127	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
R127	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 10
R127	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 10
R127	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 10
R127	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
R127	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
R127	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
R127	1,3-Dichlorobenzene	ug/L	1	G2	10			< 10
R127	1,3-Dichloropropane	ug/L	1	G2	5			< 5
R127	1,3-Dichloropropene	ug/L	1	G2	5			< 5
R127	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 10
R127	2,2-Dichloropropane	ug/L	1	G2	5			< 5
R127	2,4-Dimethylphenol	ug/L	1					< 10
R127	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
R127	2-Chlorotoluene	ug/L	1	G2	5			< 5
R127	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
R127	2-Methylnaphthalene	ug/L	1				140	< 10
R127	4-Chlorotoluene	ug/L	1	G2	5			< 5
R127	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
R127	Acenaphthene	ug/L	1				2100	< 10
R127	Acenaphthylene	ug/L	1					< 10
R127	Acetone	ug/L	1	G2	10		6300	< 100
R127	Acrylonitrile	ug/L	1	G2	100			< 5
R127	Aluminum, total	ug/L	1		162000	6850.71		< 50
R127	Ammonia as N, Diss.	mg/L	1	G1	1.82	0.84		0.46
R127	Ammonia as N, total	mg/L	1		1.75	0.97		0.48
R127	Anthracene	ug/L	1				10500	< 10
R127	Antimony, total	ug/L	1		10	10	24	< 6
R127	Arsenic, dissolved	ug/L	1	G1	19	2	200	< 2
R127	Arsenic, total	ug/L	1		27	2	200	< 2
R127	Barium, total	ug/L	1		1920	1298.79	2000	317
R127	Benzene	ug/L	1	G2	5		25	< 5
R127	Benzoic Acid	ug/L	1				28000	< 50
R127	Beryllium, total	ug/L	1		9.7	1	500	< 1

Notes:
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Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
R127	Biochemical Oxygen Demand	mg/L	1		34.3	50.18		14
R127	bis(2-ethylhexyl)phthalate	ug/L	1				60	< 5
R127	Boron, dissolved	ug/L	1	G1	1901	606.7	2000	280
R127	Boron, total	ug/L	1		1200	724.36	2000	340
R127	Bromobenzene	ug/L	1	G2	5			< 5
R127	Bromochloromethane	ug/L	1	G2	5			< 5
R127	Bromodichloromethane	ug/L	1	G2	5			< 1
R127	Bromoform	ug/L	1	G2	5			< 1
R127	Bromomethane	ug/L	1	G2	5			< 5
R127	Cadmium, dissolved	ug/L	1	G1	68	1	50	< 1
R127	Cadmium, total	ug/L	1		11	1	50	< 1
R127	Calcium, total	mg/L	1		228	178.5		388
R127	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
R127	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
R127	Chemical Oxygen Demand	mg/L	1		97	51.44		49
R127	Chloride, dissolved	mg/L	1	G1	276	329.52		399
R127	Chloride, total	mg/L	1		292	326.6		418
R127	Chlorobenzene	ug/L	1	G2	5		500	< 5
R127	Chloroethane	ug/L	1	G2	10			< 10
R127	Chloroform	ug/L	1	G2	5		350	< 1
R127	Chloromethane	ug/L	1	G2	10			< 10
R127	Chromium, dissolved	ug/L	1	G1	3	1	1000	< 1
R127	Chromium, total	ug/L	1		390	481.2	1000	< 1
R127	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
R127	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
R127	Cobalt, total	ug/L	1		45	1	1000	< 1
R127	Copper, total	ug/L	1		140	92.99	650	7
R127	Cyanide, total	mg/L	1	G1	0.005	0.01	0.6	< 0.005
R127	Dibenzofuran	ug/L	1					< 10
R127	Dibromochloromethane	ug/L	1	G2	5			< 1
R127	Dibromomethane	ug/L	1	G2	5			< 5
R127	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
R127	Ethylbenzene	ug/L	1	G2	5		1000	< 5
R127	Fluoranthene	ug/L	1				1400	< 10
R127	Fluorene	ug/L	1				1400	< 10
R127	Hexachlorobutadiene	ug/L	1	G2	10			< 10
R127	Iodomethane	ug/L	1	G2	5			< 5
R127	Iron, total	ug/L	1		20654000	13335.37		2570
R127	Isophorone	ug/L	1		10			< 10
R127	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
R127	Lead, dissolved	ug/L	1	G1	16	2	100	< 2
R127	Lead, total	ug/L	1		105	8	100	< 2
R127	Magnesium, dissolved	mg/L	1	G1	30.9	148.8		158
R127	Magnesium, total	mg/L	1		43.52	122.44		237
R127	Manganese, total	ug/L	1		2150	2514.41		4000
R127	Mercury, dissolved	ug/L	1	G1	0.2	0.2	10	< 0.2
R127	Methylene Chloride	ug/L	1	G2	5		50	< 5
R127	m-Xylene	ug/L	1		5			< 5
R127	Naphthalene	ug/L	1	G2	10		220	< 10
R127	n-Butylbenzene	ug/L	1	G2	5			< 5
R127	Nickel, total	ug/L	1		1410	217.78	2000	428
R127	Nitrate as N, dissolved	mg/L	1	G1	1.37	0.1	100	< 0.1
R127	Nitrate as N, total	mg/L	1		0.88	0.44	100	< 0.1
R127	n-Propylbenzene	ug/L	1	G2	5			< 5
R127	Oil (Hexane Soluble)	mg/L	1	G2	13	1		< 1
R127	o-Xylene	ug/L	1		5			< 5
R127	pH (field)	SU	1	G1	7.56 - 8.21	6 - 8.11		6.69
R127	Phenanthrene	ug/L	1					< 10
R127	Phenolics	ug/L	1	G2	10	10	100	< 10
R127	p-Isopropyltoluene	ug/L	1	G2	5			< 5
R127	Potassium, total	mg/L	1		36	6.09		2.5
R127	p-Xylene	ug/L	1		5			< 5
R127	Pyrene	ug/L	1				1050	< 10
R127	sec-Butylbenzene	ug/L	1	G2	5			< 5
R127	Selenium, total	ug/L	1		9	2	50	3
R127	Silver, total	ug/L	1		1	1		< 1
R127	Sodium, total	mg/L	1		479.8	271.69		178

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV		2Q13
R127	Specific Conductance (field)	umhos/cm	1	G1	2578				979
R127	Styrene	ug/L	1	G2	5		500	<	5
R127	Sulfate, dissolved	mg/L	1	G1	79	15			56
R127	Sulfate, total	mg/L	1		79	15			55
R127	tert-Butylbenzene	ug/L	1	G2	5			<	5
R127	Tetrachloroethene	ug/L	1	G2	5		25	<	5
R127	Tetrahydrofuran	ug/L	1	G2	5			<	5
R127	Tin, total	ug/L	1					<	20
R127	Toluene	ug/L	1	G2	5		2500	<	5
R127	Total Dissolved Solids	mg/L	1	G1	1421	1399.28	1200		1210
R127	Total Organic Carbon	mg/L	1		11.9	21.55			21
R127	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	<	5
R127	trans-1,3-Dichloropropene	ug/L	1	G2	5			<	5
R127	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			<	5
R127	Trichloroethene	ug/L	1	G2	5		25	<	5
R127	Trichlorofluoromethane	ug/L	1	G2	5		10500	<	5
R127	Vanadium, total	ug/L	1		140	10	100	<	10
R127	Vinyl Acetate	ug/L	1	G2	10			<	5
R127	Vinyl Chloride	ug/L	1	G2	10		10	<	2
R127	Xylenes (Total)	ug/L	1	G2	5		10000	<	5
R127	Zinc, dissolved	ug/L	1	G1	9	21.44	10000	<	5
R127	Zinc, total	ug/L	1		760	46	10000	<	5
R132	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			<	5
R132	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	<	5
R132	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			<	5
R132	1,1,2-Trichloroethane	ug/L	1	G2	5		50	<	5
R132	1,1-Dichloroethane	ug/L	1	G2	5		7000	<	5
R132	1,1-Dichloroethene	ug/L	1	G2	5		35	<	5
R132	1,1-Dichloropropene	ug/L	1	G2	5			<	5
R132	1,2,3-Trichlorobenzene	ug/L	1	G2	5			<	5
R132	1,2,3-Trichloropropane	ug/L	1	G2	5			<	5
R132	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	<	5
R132	1,2,4-Trimethylbenzene	ug/L	1	G2	5			<	5
R132	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	<	5
R132	1,2-Dibromoethane	ug/L	1	G2	10		0.5	<	5
R132	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	<	5
R132	1,2-Dichloroethane	ug/L	1	G2	5		25	<	5
R132	1,2-Dichloropropane	ug/L	1	G2	5		25	<	5
R132	1,3,5-Trimethylbenzene	ug/L	1	G2	5			<	5
R132	1,3-Dichlorobenzene	ug/L	1	G2	10			<	5
R132	1,3-Dichloropropane	ug/L	1	G2	5			<	5
R132	1,3-Dichloropropene	ug/L	1	G2	5			<	5
R132	1,4-Dichlorobenzene	ug/L	1	G2	10		375	<	5
R132	2,2-Dichloropropane	ug/L	1	G2	5			<	5
R132	2-Butanone (MEK)	ug/L	1	G2	10		4200	<	10
R132	2-Chlorotoluene	ug/L	1	G2	5			<	5
R132	2-Hexanone (MBK)	ug/L	1	G2	5			<	10
R132	4-Chlorotoluene	ug/L	1	G2	5			<	5
R132	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			<	10
R132	Acetone	ug/L	1	G2	10		6300	<	10
R132	Acrylonitrile	ug/L	1	G2	100			<	100
R132	Ammonia as N, Diss.	mg/L	1	G1	1.82	0.81		<	0.1
R132	Arsenic, dissolved	ug/L	1	G1	19	5	200	<	2
R132	Benzene	ug/L	1	G2	5		25	<	5
R132	Boron, dissolved	ug/L	1	G1	1901	640	2000		510
R132	Bromobenzene	ug/L	1	G2	5			<	5
R132	Bromochloromethane	ug/L	1	G2	5			<	5
R132	Bromodichloromethane	ug/L	1	G2	5			<	5
R132	Bromoform	ug/L	1	G2	5			<	5
R132	Bromomethane	ug/L	1	G2	5			<	5
R132	Cadmium, dissolved	ug/L	1	G1	68	1	50	<	1
R132	Carbon Disulfide	ug/L	1	G2	5		3500	<	5
R132	Carbon Tetrachloride	ug/L	1	G2	5		25	<	5
R132	Chloride, dissolved	mg/L	1	G1	276	68			218
R132	Chlorobenzene	ug/L	1	G2	5		500	<	5
R132	Chloroethane	ug/L	1	G2	10			<	10
R132	Chloroform	ug/L	1	G2	5		350	<	5

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
R132	Chloromethane	ug/L	1	G2	10			< 10
R132	Chromium, dissolved	ug/L	1	G1	3	1	1000	< 1
R132	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
R132	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
R132	Cyanide, total	mg/L	1	G1	0.005	0.005	0.6	< 0.005
R132	Dibromochloromethane	ug/L	1	G2	5			< 5
R132	Dibromomethane	ug/L	1	G2	5			< 5
R132	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
R132	Ethylbenzene	ug/L	1	G2	5		1000	< 5
R132	Hexachlorobutadiene	ug/L	1	G2	10			< 10
R132	Iodomethane	ug/L	1	G2	5			< 5
R132	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
R132	Lead, dissolved	ug/L	1	G1	16	2	100	< 2
R132	Magnesium, dissolved	mg/L	1	G1	30.9	113.8		114
R132	Mercury, dissolved	ug/L	1	G1	0.2	0.2	10	< 0.2
R132	Methylene Chloride	ug/L	1	G2	5		50	< 5
R132	Naphthalene	ug/L	1	G2	10		220	< 5
R132	n-Butylbenzene	ug/L	1	G2	5			< 5
R132	Nitrate as N, dissolved	mg/L	1	G1	1.37	1.003	100	0.67
R132	n-Propylbenzene	ug/L	1	G2	5			< 5
R132	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
R132	pH (field)	SU	1	G1	7.56 - 8.21	5.87 - 9.58		6.91
R132	Phenolics	ug/L	1	G2	10	110	100	< 10
R132	p-Isopropyltoluene	ug/L	1	G2	5			< 5
R132	sec-Butylbenzene	ug/L	1	G2	5			< 5
R132	Specific Conductance (field)	umhos/cm	1	G1	2578			2008
R132	Styrene	ug/L	1	G2	5		500	< 5
R132	Sulfate, dissolved	mg/L	1	G1	79	299.3		230
R132	tert-Butylbenzene	ug/L	1	G2	5			< 5
R132	Tetrachloroethene	ug/L	1	G2	5		25	< 5
R132	Tetrahydrofuran	ug/L	1	G2	5			< 5
R132	Toluene	ug/L	1	G2	5		2500	< 5
R132	Total Dissolved Solids	mg/L	1	G1	1421	941	1200	1370
R132	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
R132	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
R132	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
R132	Trichloroethene	ug/L	1	G2	5		25	< 5
R132	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
R132	Vinyl Acetate	ug/L	1	G2	10			< 10
R132	Vinyl Chloride	ug/L	1	G2	10		10	< 2
R132	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
R132	Zinc, dissolved	ug/L	1	G1	9	39.62	10000	< 5
T101	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T101	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T101	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T101	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T101	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T101	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T101	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T101	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T101	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T101	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T101	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T101	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T101	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T101	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T101	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T101	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T101	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T101	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T101	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T101	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T101	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T101	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T101	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T101	2-Chlorotoluene	ug/L	1	G2	5			< 5
T101	2-Hexanone (MBK)	ug/L	1	G2	5			< 10

Notes:
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Andrews Engineering, Inc.

Table 1A

Brickyard Disposal and Recycling

Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T101	4-Chlorotoluene	ug/L	1	G2	5			< 5
T101	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T101	Acetone	ug/L	1	G2	10		6300	< 10
T101	Acrylonitrile	ug/L	1	G2	100			< 100
T101	Ammonia as N, Diss.	mg/L	1	G1	1.82			< 0.1
T101	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T101	Benzene	ug/L	1	G2	5		25	< 5
T101	Boron, dissolved	ug/L	1	G1	1901		2000	830
T101	Bromobenzene	ug/L	1	G2	5			< 5
T101	Bromochloromethane	ug/L	1	G2	5			< 5
T101	Bromodichloromethane	ug/L	1	G2	5			< 5
T101	Bromoform	ug/L	1	G2	5			< 5
T101	Bromomethane	ug/L	1	G2	5			< 5
T101	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T101	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T101	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T101	Chloride, dissolved	mg/L	1	G1	276			129
T101	Chlorobenzene	ug/L	1	G2	5		500	< 5
T101	Chloroethane	ug/L	1	G2	10			< 10
T101	Chloroform	ug/L	1	G2	5		350	< 5
T101	Chloromethane	ug/L	1	G2	10			< 10
T101	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T101	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T101	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T101	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T101	Dibromochloromethane	ug/L	1	G2	5			< 5
T101	Dibromomethane	ug/L	1	G2	5			< 5
T101	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T101	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T101	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T101	Iodomethane	ug/L	1	G2	5			< 5
T101	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
T101	Lead, dissolved	ug/L	1	G1	16		100	< 2
T101	Magnesium, dissolved	mg/L	1	G1	30.9			146
T101	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
T101	Methylene Chloride	ug/L	1	G2	5		50	< 5
T101	Naphthalene	ug/L	1	G2	10		220	< 5
T101	n-Butylbenzene	ug/L	1	G2	5			< 5
T101	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	< 0.1
T101	n-Propylbenzene	ug/L	1	G2	5			< 5
T101	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
T101	pH (field)	SU	1	G1	7.56 - 8.21			6.84
T101	Phenolics	ug/L	1	G2	10		100	< 10
T101	p-Isopropyltoluene	ug/L	1	G2	5			< 5
T101	sec-Butylbenzene	ug/L	1	G2	5			< 5
T101	Specific Conductance (field)	umhos/cm	1	G1	2578			1125
T101	Styrene	ug/L	1	G2	5		500	< 5
T101	Sulfate, dissolved	mg/L	1	G1	79			1340
T101	tert-Butylbenzene	ug/L	1	G2	5			< 5
T101	Tetrachloroethene	ug/L	1	G2	5		25	< 5
T101	Tetrahydrofuran	ug/L	1	G2	5			< 5
T101	Toluene	ug/L	1	G2	5		2500	< 5
T101	Total Dissolved Solids	mg/L	1	G1	1421		1200	2980
T101	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
T101	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T101	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
T101	Trichloroethene	ug/L	1	G2	5		25	< 5
T101	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
T101	Vinyl Acetate	ug/L	1	G2	10			< 10
T101	Vinyl Chloride	ug/L	1	G2	10		10	< 2
T101	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
T101	Zinc, dissolved	ug/L	1	G1	9		10000	< 5
T103	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T103	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T103	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T103	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T103	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5

Notes:
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Andrews Engineering, Inc.

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T103	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T103	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T103	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T103	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T103	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T103	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T103	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T103	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T103	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T103	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T103	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T103	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T103	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T103	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T103	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T103	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T103	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T103	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T103	2-Chlorotoluene	ug/L	1	G2	5			< 5
T103	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T103	4-Chlorotoluene	ug/L	1	G2	5			< 5
T103	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T103	Acetone	ug/L	1	G2	10		6300	< 10
T103	Acrylonitrile	ug/L	1	G2	100			< 100
T103	Ammonia as N, Diss.	mg/L	1	G1	1.82			0.49
T103	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T103	Benzene	ug/L	1	G2	5		25	< 5
T103	Boron, dissolved	ug/L	1	G1	1901		2000	170
T103	Bromobenzene	ug/L	1	G2	5			< 5
T103	Bromochloromethane	ug/L	1	G2	5			< 5
T103	Bromodichloromethane	ug/L	1	G2	5			< 5
T103	Bromoform	ug/L	1	G2	5			< 5
T103	Bromomethane	ug/L	1	G2	5			< 5
T103	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T103	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T103	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T103	Chloride, dissolved	mg/L	1	G1	276			57
T103	Chloride, total	mg/L	1		292			57
T103	Chlorobenzene	ug/L	1	G2	5		500	< 5
T103	Chloroethane	ug/L	1	G2	10			< 10
T103	Chloroform	ug/L	1	G2	5		350	< 5
T103	Chloromethane	ug/L	1	G2	10			< 10
T103	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T103	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T103	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T103	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T103	Dibromochloromethane	ug/L	1	G2	5			< 5
T103	Dibromomethane	ug/L	1	G2	5			< 5
T103	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T103	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T103	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T103	Iodomethane	ug/L	1	G2	5			< 5
T103	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
T103	Lead, dissolved	ug/L	1	G1	16		100	< 2
T103	Magnesium, dissolved	mg/L	1	G1	30.9			49.8
T103	Manganese, total	ug/L	1		2150			1240
T103	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
T103	Methylene Chloride	ug/L	1	G2	5		50	< 5
T103	Naphthalene	ug/L	1	G2	10		220	< 5
T103	n-Butylbenzene	ug/L	1	G2	5			< 5
T103	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	< 0.1
T103	n-Propylbenzene	ug/L	1	G2	5			< 5
T103	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
T103	pH (field)	SU	1	G1	7.56 - 8.21			7.07
T103	Phenolics	ug/L	1	G2	10		100	< 10
T103	p-Isopropyltoluene	ug/L	1	G2	5			< 5
T103	sec-Butylbenzene	ug/L	1	G2	5			< 5

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T103	Specific Conductance (field)	umhos/cm	1	G1	2578			664
T103	Styrene	ug/L	1	G2	5		500	< 5
T103	Sulfate, dissolved	mg/L	1	G1	79			102
T103	Sulfate, total	mg/L	1		79			100
T103	tert-Butylbenzene	ug/L	1	G2	5			< 5
T103	Tetrachloroethene	ug/L	1	G2	5		25	< 5
T103	Tetrahydrofuran	ug/L	1	G2	5			< 5
T103	Toluene	ug/L	1	G2	5		2500	< 5
T103	Total Dissolved Solids	mg/L	1	G1	1421		1200	639
T103	Total Organic Carbon	mg/L	1		11.9			5.9
T103	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
T103	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T103	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
T103	Trichloroethene	ug/L	1	G2	5		25	< 5
T103	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
T103	Vinyl Acetate	ug/L	1	G2	10			< 10
T103	Vinyl Chloride	ug/L	1	G2	10		10	< 2
T103	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
T103	Zinc, dissolved	ug/L	1	G1	9		10000	< 5
T104	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T104	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T104	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T104	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T104	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T104	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T104	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T104	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T104	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T104	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T104	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T104	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T104	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T104	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T104	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T104	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T104	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T104	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T104	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T104	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T104	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T104	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T104	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T104	2-Chlorotoluene	ug/L	1	G2	5			< 5
T104	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T104	4-Chlorotoluene	ug/L	1	G2	5			< 5
T104	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T104	Acetone	ug/L	1	G2	10		6300	< 10
T104	Acrylonitrile	ug/L	1	G2	100			< 100
T104	Ammonia as N, Diss.	mg/L	1	G1	1.82			2.56
T104	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T104	Benzene	ug/L	1	G2	5		25	< 5
T104	Boron, dissolved	ug/L	1	G1	1901		2000	1980
T104	Bromobenzene	ug/L	1	G2	5			< 5
T104	Bromochloromethane	ug/L	1	G2	5			< 5
T104	Bromodichloromethane	ug/L	1	G2	5			< 5
T104	Bromoform	ug/L	1	G2	5			< 5
T104	Bromomethane	ug/L	1	G2	5			< 5
T104	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T104	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T104	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T104	Chloride, dissolved	mg/L	1	G1	276			86
T104	Chloride, total	mg/L	1		292			92
T104	Chlorobenzene	ug/L	1	G2	5		500	< 5
T104	Chloroethane	ug/L	1	G2	10			< 10
T104	Chloroform	ug/L	1	G2	5		350	< 5
T104	Chloromethane	ug/L	1	G2	10			< 10
T104	Chromium, dissolved	ug/L	1	G1	3		1000	< 1

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T104	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T104	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T104	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T104	Dibromochloromethane	ug/L	1	G2	5			< 5
T104	Dibromomethane	ug/L	1	G2	5			< 5
T104	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T104	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T104	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T104	Iodomethane	ug/L	1	G2	5			< 5
T104	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
T104	Lead, dissolved	ug/L	1	G1	16		100	< 2
T104	Magnesium, dissolved	mg/L	1	G1	30.9			158
T104	Manganese, total	ug/L	1		2150			670
T104	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
T104	Methylene Chloride	ug/L	1	G2	5		50	< 5
T104	Naphthalene	ug/L	1	G2	10		220	< 5
T104	n-Butylbenzene	ug/L	1	G2	5			< 5
T104	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	< 0.1
T104	n-Propylbenzene	ug/L	1	G2	5			< 5
T104	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
T104	pH (field)	SU	1	G1	7.56 - 8.21			6.83
T104	Phenolics	ug/L	1	G2	10		100	< 10
T104	p-Isopropyltoluene	ug/L	1	G2	5			< 5
T104	sec-Butylbenzene	ug/L	1	G2	5			< 5
T104	Specific Conductance (field)	umhos/cm	1	G1	2578			1791
T104	Styrene	ug/L	1	G2	5		500	< 5
T104	Sulfate, dissolved	mg/L	1	G1	79			1920
T104	Sulfate, total	mg/L	1		79			1790
T104	tert-Butylbenzene	ug/L	1	G2	5			< 5
T104	Tetrachloroethene	ug/L	1	G2	5		25	< 5
T104	Tetrahydrofuran	ug/L	1	G2	5			< 5
T104	Toluene	ug/L	1	G2	5		2500	< 5
T104	Total Dissolved Solids	mg/L	1	G1	1421		1200	4040
T104	Total Organic Carbon	mg/L	1		11.9			3.2
T104	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
T104	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T104	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
T104	Trichloroethene	ug/L	1	G2	5		25	< 5
T104	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
T104	Vinyl Acetate	ug/L	1	G2	10			< 10
T104	Vinyl Chloride	ug/L	1	G2	10		10	< 2
T104	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
T104	Zinc, dissolved	ug/L	1	G1	9		10000	< 5
T110	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T110	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T110	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T110	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T110	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T110	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T110	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T110	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T110	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T110	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T110	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T110	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T110	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T110	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T110	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T110	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T110	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T110	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T110	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T110	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T110	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T110	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T110	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T110	2-Chlorotoluene	ug/L	1	G2	5			< 5

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T110	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T110	4-Chlorotoluene	ug/L	1	G2	5			< 5
T110	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T110	Acetone	ug/L	1	G2	10		6300	< 10
T110	Acrylonitrile	ug/L	1	G2	100			< 100
T110	Ammonia as N, Diss.	mg/L	1	G1	1.82			< 0.1
T110	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T110	Benzene	ug/L	1	G2	5		25	< 5
T110	Boron, dissolved	ug/L	1	G1	1901		2000	170
T110	Bromobenzene	ug/L	1	G2	5			< 5
T110	Bromochloromethane	ug/L	1	G2	5			< 5
T110	Bromodichloromethane	ug/L	1	G2	5			< 5
T110	Bromoform	ug/L	1	G2	5			< 5
T110	Bromomethane	ug/L	1	G2	5			< 5
T110	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T110	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T110	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T110	Chloride, dissolved	mg/L	1	G1	276			10
T110	Chloride, total	mg/L	1		292			8
T110	Chlorobenzene	ug/L	1	G2	5		500	< 5
T110	Chloroethane	ug/L	1	G2	10			< 10
T110	Chloroform	ug/L	1	G2	5		350	< 5
T110	Chloromethane	ug/L	1	G2	10			< 10
T110	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T110	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T110	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T110	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T110	Dibromochloromethane	ug/L	1	G2	5			< 5
T110	Dibromomethane	ug/L	1	G2	5			< 5
T110	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T110	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T110	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T110	Iodomethane	ug/L	1	G2	5			< 5
T110	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
T110	Lead, dissolved	ug/L	1	G1	16		100	< 2
T110	Magnesium, dissolved	mg/L	1	G1	30.9			145
T110	Manganese, total	ug/L	1		2150			1760
T110	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
T110	Methylene Chloride	ug/L	1	G2	5		50	< 5
T110	Naphthalene	ug/L	1	G2	10		220	< 5
T110	n-Butylbenzene	ug/L	1	G2	5			< 5
T110	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	< 0.1
T110	n-Propylbenzene	ug/L	1	G2	5			< 5
T110	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
T110	pH (field)	SU	1	G1	7.56 - 8.21			6.73
T110	Phenolics	ug/L	1	G2	10		100	< 10
T110	p-Isopropyltoluene	ug/L	1	G2	5			< 5
T110	sec-Butylbenzene	ug/L	1	G2	5			< 5
T110	Specific Conductance (field)	umhos/cm	1	G1	2578			720
T110	Styrene	ug/L	1	G2	5		500	< 5
T110	Sulfate, dissolved	mg/L	1	G1	79			1240
T110	Sulfate, total	mg/L	1		79			1160
T110	tert-Butylbenzene	ug/L	1	G2	5			< 5
T110	Tetrachloroethene	ug/L	1	G2	5		25	< 5
T110	Tetrahydrofuran	ug/L	1	G2	5			< 5
T110	Toluene	ug/L	1	G2	5		2500	< 5
T110	Total Dissolved Solids	mg/L	1	G1	1421		1200	2410
T110	Total Organic Carbon	mg/L	1		11.9			3.2
T110	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
T110	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T110	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
T110	Trichloroethene	ug/L	1	G2	5		25	< 5
T110	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
T110	Vinyl Acetate	ug/L	1	G2	10			< 10
T110	Vinyl Chloride	ug/L	1	G2	10		10	< 2
T110	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
T110	Zinc, dissolved	ug/L	1	G1	9		10000	< 5

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T111	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T111	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T111	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T111	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T111	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T111	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T111	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T111	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T111	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T111	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T111	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T111	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T111	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T111	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T111	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T111	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T111	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T111	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T111	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T111	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T111	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T111	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T111	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T111	2-Chlorotoluene	ug/L	1	G2	5			< 5
T111	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T111	4-Chlorotoluene	ug/L	1	G2	5			< 5
T111	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T111	Acetone	ug/L	1	G2	10		6300	< 10
T111	Acrylonitrile	ug/L	1	G2	100			< 100
T111	Ammonia as N, Diss.	mg/L	1	G1	1.82			1.82
T111	Arsenic, dissolved	ug/L	1	G1	19		200	8
T111	Benzene	ug/L	1	G2	5		25	< 5
T111	Boron, dissolved	ug/L	1	G1	1901		2000	220
T111	Bromobenzene	ug/L	1	G2	5			< 5
T111	Bromochloromethane	ug/L	1	G2	5			< 5
T111	Bromodichloromethane	ug/L	1	G2	5			< 5
T111	Bromoform	ug/L	1	G2	5			< 5
T111	Bromomethane	ug/L	1	G2	5			< 5
T111	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T111	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T111	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T111	Chloride, dissolved	mg/L	1	G1	276			21
T111	Chloride, total	mg/L	1		292			22
T111	Chlorobenzene	ug/L	1	G2	5		500	< 5
T111	Chloroethane	ug/L	1	G2	10			< 10
T111	Chloroform	ug/L	1	G2	5		350	< 5
T111	Chloromethane	ug/L	1	G2	10			< 10
T111	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T111	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T111	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T111	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T111	Dibromochloromethane	ug/L	1	G2	5			< 5
T111	Dibromomethane	ug/L	1	G2	5			< 5
T111	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T111	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T111	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T111	Iodomethane	ug/L	1	G2	5			< 5
T111	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
T111	Lead, dissolved	ug/L	1	G1	16		100	< 2
T111	Magnesium, dissolved	mg/L	1	G1	30.9			147
T111	Manganese, total	ug/L	1		2150			8150
T111	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
T111	Methylene Chloride	ug/L	1	G2	5		50	< 5
T111	Naphthalene	ug/L	1	G2	10		220	< 5
T111	n-Butylbenzene	ug/L	1	G2	5			< 5
T111	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	< 0.1
T111	n-Propylbenzene	ug/L	1	G2	5			< 5

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T111	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
T111	pH (field)	SU	1	G1	7.56 - 8.21			5.92
T111	Phenolics	ug/L	1	G2	10		100	< 10
T111	p-Isopropyltoluene	ug/L	1	G2	5			< 5
T111	sec-Butylbenzene	ug/L	1	G2	5			< 5
T111	Specific Conductance (field)	umhos/cm	1	G1	2578			1159
T111	Styrene	ug/L	1	G2	5		500	< 5
T111	Sulfate, dissolved	mg/L	1	G1	79			1920
T111	Sulfate, total	mg/L	1		79			2050
T111	tert-Butylbenzene	ug/L	1	G2	5			< 5
T111	Tetrachloroethene	ug/L	1	G2	5		25	< 5
T111	Tetrahydrofuran	ug/L	1	G2	5			< 5
T111	Toluene	ug/L	1	G2	5		2500	< 5
T111	Total Dissolved Solids	mg/L	1	G1	1421		1200	3260
T111	Total Organic Carbon	mg/L	1		11.9			5.4
T111	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
T111	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T111	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
T111	Trichloroethene	ug/L	1	G2	5		25	< 5
T111	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
T111	Vinyl Acetate	ug/L	1	G2	10			< 10
T111	Vinyl Chloride	ug/L	1	G2	10		10	< 2
T111	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
T111	Zinc, dissolved	ug/L	1	G1	9		10000	146
T113	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T113	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T113	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T113	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T113	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T113	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T113	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T113	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T113	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T113	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T113	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T113	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T113	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T113	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T113	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T113	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T113	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T113	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T113	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T113	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T113	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T113	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T113	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T113	2-Chlorotoluene	ug/L	1	G2	5			< 5
T113	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T113	4-Chlorotoluene	ug/L	1	G2	5			< 5
T113	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T113	Acetone	ug/L	1	G2	10		6300	< 10
T113	Acrylonitrile	ug/L	1	G2	100			< 100
T113	Ammonia as N, Diss.	mg/L	1	G1	1.82			2.41
T113	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T113	Benzene	ug/L	1	G2	5		25	< 5
T113	Boron, dissolved	ug/L	1	G1	1901		2000	560
T113	Bromobenzene	ug/L	1	G2	5			< 5
T113	Bromochloromethane	ug/L	1	G2	5			< 5
T113	Bromodichloromethane	ug/L	1	G2	5			< 5
T113	Bromoform	ug/L	1	G2	5			< 5
T113	Bromomethane	ug/L	1	G2	5			< 5
T113	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T113	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T113	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T113	Chloride, dissolved	mg/L	1	G1	276			93
T113	Chloride, total	mg/L	1		292			98

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T113	Chlorobenzene	ug/L	1	G2	5		500	< 5
T113	Chloroethane	ug/L	1	G2	10			< 10
T113	Chloroform	ug/L	1	G2	5		350	< 5
T113	Chloromethane	ug/L	1	G2	10			< 10
T113	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T113	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T113	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T113	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T113	Dibromochloromethane	ug/L	1	G2	5			< 5
T113	Dibromomethane	ug/L	1	G2	5			< 5
T113	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T113	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T113	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T113	Iodomethane	ug/L	1	G2	5			< 5
T113	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
T113	Lead, dissolved	ug/L	1	G1	16		100	< 2
T113	Magnesium, dissolved	mg/L	1	G1	30.9			170
T113	Manganese, total	ug/L	1		2150			20600
T113	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
T113	Methylene Chloride	ug/L	1	G2	5		50	< 5
T113	Naphthalene	ug/L	1	G2	10		220	< 5
T113	n-Butylbenzene	ug/L	1	G2	5			< 5
T113	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	< 0.1
T113	n-Propylbenzene	ug/L	1	G2	5			< 5
T113	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
T113	pH (field)	SU	1	G1	7.56 - 8.21			6.72
T113	Phenolics	ug/L	1	G2	10		100	< 10
T113	p-Isopropyltoluene	ug/L	1	G2	5			< 5
T113	sec-Butylbenzene	ug/L	1	G2	5			< 5
T113	Specific Conductance (field)	umhos/cm	1	G1	2578			986
T113	Styrene	ug/L	1	G2	5		500	< 5
T113	Sulfate, dissolved	mg/L	1	G1	79			520
T113	Sulfate, total	mg/L	1		79			530
T113	tert-Butylbenzene	ug/L	1	G2	5			< 5
T113	Tetrachloroethene	ug/L	1	G2	5		25	< 5
T113	Tetrahydrofuran	ug/L	1	G2	5			< 5
T113	Toluene	ug/L	1	G2	5		2500	< 5
T113	Total Dissolved Solids	mg/L	1	G1	1421		1200	1900
T113	Total Organic Carbon	mg/L	1		11.9			24
T113	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
T113	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T113	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
T113	Trichloroethene	ug/L	1	G2	5		25	< 5
T113	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
T113	Vinyl Acetate	ug/L	1	G2	10			< 10
T113	Vinyl Chloride	ug/L	1	G2	10		10	< 2
T113	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
T113	Zinc, dissolved	ug/L	1	G1	9		10000	< 5
T114	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T114	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T114	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T114	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T114	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T114	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T114	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T114	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T114	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T114	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T114	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T114	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T114	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T114	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T114	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T114	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T114	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T114	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T114	1,3-Dichloropropane	ug/L	1	G2	5			< 5

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T114	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T114	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T114	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T114	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T114	2-Chlorotoluene	ug/L	1	G2	5			< 5
T114	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T114	4-Chlorotoluene	ug/L	1	G2	5			< 5
T114	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T114	Acetone	ug/L	1	G2	10		6300	< 10
T114	Acrylonitrile	ug/L	1	G2	100			< 100
T114	Ammonia as N, Diss.	mg/L	1	G1	1.82	25.42		11.7
T114	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T114	Benzene	ug/L	1	G2	5		25	< 5
T114	Boron, dissolved	ug/L	1	G1	1901		2000	990
T114	Bromobenzene	ug/L	1	G2	5			< 5
T114	Bromochloromethane	ug/L	1	G2	5			< 5
T114	Bromodichloromethane	ug/L	1	G2	5			< 5
T114	Bromoform	ug/L	1	G2	5			< 5
T114	Bromomethane	ug/L	1	G2	5			< 5
T114	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T114	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T114	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T114	Chloride, dissolved	mg/L	1	G1	276			202
T114	Chlorobenzene	ug/L	1	G2	5		500	< 5
T114	Chloroethane	ug/L	1	G2	10			< 10
T114	Chloroform	ug/L	1	G2	5		350	< 5
T114	Chloromethane	ug/L	1	G2	10			< 10
T114	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T114	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T114	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T114	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T114	Dibromochloromethane	ug/L	1	G2	5			< 5
T114	Dibromomethane	ug/L	1	G2	5			< 5
T114	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T114	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T114	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T114	Iodomethane	ug/L	1	G2	5			< 5
T114	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
T114	Lead, dissolved	ug/L	1	G1	16		100	< 2
T114	Magnesium, dissolved	mg/L	1	G1	30.9	176.61		171
T114	Manganese, total	ug/L	1		2150			8340
T114	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
T114	Methylene Chloride	ug/L	1	G2	5		50	< 5
T114	Naphthalene	ug/L	1	G2	10		220	< 5
T114	n-Butylbenzene	ug/L	1	G2	5			< 5
T114	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	0.3
T114	n-Propylbenzene	ug/L	1	G2	5			< 5
T114	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
T114	pH (field)	SU	1	G1	7.56 - 8.21	6.16 - 7.31		6.62
T114	Phenolics	ug/L	1	G2	10	90.99	100	< 10
T114	p-Isopropyltoluene	ug/L	1	G2	5			< 5
T114	sec-Butylbenzene	ug/L	1	G2	5			< 5
T114	Specific Conductance (field)	umhos/cm	1	G1	2578	3161.94		2389
T114	Styrene	ug/L	1	G2	5		500	< 5
T114	Sulfate, dissolved	mg/L	1	G1	79			27
T114	tert-Butylbenzene	ug/L	1	G2	5			< 5
T114	Tetrachloroethene	ug/L	1	G2	5		25	< 5
T114	Tetrahydrofuran	ug/L	1	G2	5			20.3
T114	Toluene	ug/L	1	G2	5		2500	< 5
T114	Total Dissolved Solids	mg/L	1	G1	1421	1736.63	1200	1410
T114	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
T114	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T114	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
T114	Trichloroethene	ug/L	1	G2	5		25	< 5
T114	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
T114	Vinyl Acetate	ug/L	1	G2	10			< 10
T114	Vinyl Chloride	ug/L	1	G2	10		10	< 2

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T114	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
T114	Zinc, dissolved	ug/L	1	G1	9		10000	< 5
T115	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T115	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T115	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T115	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T115	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T115	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T115	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T115	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T115	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T115	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T115	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T115	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T115	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T115	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T115	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T115	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T115	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T115	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T115	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T115	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T115	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T115	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T115	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T115	2-Chlorotoluene	ug/L	1	G2	5			< 5
T115	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T115	4-Chlorotoluene	ug/L	1	G2	5			< 5
T115	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T115	Acetone	ug/L	1	G2	10		6300	< 10
T115	Acrylonitrile	ug/L	1	G2	100			< 100
T115	Ammonia as N, Diss.	mg/L	1	G1	1.82	6.76		2.56
T115	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T115	Benzene	ug/L	1	G2	5		25	< 5
T115	Boron, dissolved	ug/L	1	G1	1901		2000	250
T115	Bromobenzene	ug/L	1	G2	5			< 5
T115	Bromochloromethane	ug/L	1	G2	5			< 5
T115	Bromodichloromethane	ug/L	1	G2	5			< 5
T115	Bromoform	ug/L	1	G2	5			< 5
T115	Bromomethane	ug/L	1	G2	5			< 5
T115	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T115	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T115	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T115	Chloride, dissolved	mg/L	1	G1	276			52
T115	Chlorobenzene	ug/L	1	G2	5		500	< 5
T115	Chloroethane	ug/L	1	G2	10			< 10
T115	Chloroform	ug/L	1	G2	5		350	< 5
T115	Chloromethane	ug/L	1	G2	10			< 10
T115	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T115	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T115	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T115	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T115	Dibromochloromethane	ug/L	1	G2	5			< 5
T115	Dibromomethane	ug/L	1	G2	5			< 5
T115	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T115	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T115	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T115	Iodomethane	ug/L	1	G2	5			< 5
T115	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
T115	Lead, dissolved	ug/L	1	G1	16		100	< 2
T115	Magnesium, dissolved	mg/L	1	G1	30.9	126.66		119
T115	Manganese, total	ug/L	1		2150			5560
T115	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
T115	Methylene Chloride	ug/L	1	G2	5		50	< 5
T115	Naphthalene	ug/L	1	G2	10		220	< 5
T115	n-Butylbenzene	ug/L	1	G2	5			< 5
T115	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	< 0.1

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T115	n-Propylbenzene	ug/L	1	G2	5			< 5
T115	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
T115	pH (field)	SU	1	G1	7.56 - 8.21	5.18 - 8.86		6.91
T115	Phenolics	ug/L	1	G2	10		100	< 10
T115	p-Isopropyltoluene	ug/L	1	G2	5			< 5
T115	sec-Butylbenzene	ug/L	1	G2	5			< 5
T115	Specific Conductance (field)	umhos/cm	1	G1	2578			904
T115	Styrene	ug/L	1	G2	5		500	< 5
T115	Sulfate, dissolved	mg/L	1	G1	79	1394.52		480
T115	Sulfate, total	mg/L	1		79			480
T115	tert-Butylbenzene	ug/L	1	G2	5			< 5
T115	Tetrachloroethene	ug/L	1	G2	5		25	< 5
T115	Tetrahydrofuran	ug/L	1	G2	5			< 5
T115	Toluene	ug/L	1	G2	5		2500	< 5
T115	Total Dissolved Solids	mg/L	1	G1	1421	2708.41	1200	1520
T115	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
T115	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T115	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
T115	Trichloroethene	ug/L	1	G2	5		25	< 5
T115	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
T115	Vinyl Acetate	ug/L	1	G2	10			< 10
T115	Vinyl Chloride	ug/L	1	G2	10		10	< 2
T115	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
T115	Zinc, dissolved	ug/L	1	G1	9		10000	< 5
T116	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T116	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T116	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T116	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T116	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T116	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T116	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T116	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T116	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T116	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T116	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T116	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T116	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T116	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T116	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T116	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T116	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T116	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T116	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T116	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T116	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T116	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T116	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T116	2-Chlorotoluene	ug/L	1	G2	5			< 5
T116	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T116	4-Chlorotoluene	ug/L	1	G2	5			< 5
T116	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T116	Acetone	ug/L	1	G2	10		6300	< 10
T116	Acrylonitrile	ug/L	1	G2	100			< 100
T116	Ammonia as N, Diss.	mg/L	1	G1	1.82			< 0.1
T116	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T116	Benzene	ug/L	1	G2	5		25	< 5
T116	Boron, dissolved	ug/L	1	G1	1901		2000	320
T116	Bromobenzene	ug/L	1	G2	5			< 5
T116	Bromochloromethane	ug/L	1	G2	5			< 5
T116	Bromodichloromethane	ug/L	1	G2	5			< 5
T116	Bromoform	ug/L	1	G2	5			< 5
T116	Bromomethane	ug/L	1	G2	5			< 5
T116	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T116	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T116	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T116	Chloride, dissolved	mg/L	1	G1	276			18
T116	Chlorobenzene	ug/L	1	G2	5		500	< 5

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T116	Chloroethane	ug/L	1	G2	10			< 10
T116	Chloroform	ug/L	1	G2	5		350	< 5
T116	Chloromethane	ug/L	1	G2	10			< 10
T116	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T116	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T116	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T116	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T116	Dibromochloromethane	ug/L	1	G2	5			< 5
T116	Dibromomethane	ug/L	1	G2	5			< 5
T116	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T116	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T116	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T116	Iodomethane	ug/L	1	G2	5			< 5
T116	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
T116	Lead, dissolved	ug/L	1	G1	16		100	< 2
T116	Magnesium, dissolved	mg/L	1	G1	30.9	112.58		87.5
T116	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
T116	Methylene Chloride	ug/L	1	G2	5		50	< 5
T116	Naphthalene	ug/L	1	G2	10		220	< 5
T116	n-Butylbenzene	ug/L	1	G2	5			< 5
T116	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	< 0.1
T116	n-Propylbenzene	ug/L	1	G2	5			< 5
T116	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
T116	pH (field)	SU	1	G1	7.56 - 8.21	5.37 - 8.62		7.19
T116	Phenolics	ug/L	1	G2	10		100	< 10
T116	p-Isopropyltoluene	ug/L	1	G2	5			< 5
T116	sec-Butylbenzene	ug/L	1	G2	5			< 5
T116	Specific Conductance (field)	umhos/cm	1	G1	2578			858
T116	Styrene	ug/L	1	G2	5		500	< 5
T116	Sulfate, dissolved	mg/L	1	G1	79	661.98		416
T116	tert-Butylbenzene	ug/L	1	G2	5			< 5
T116	Tetrachloroethene	ug/L	1	G2	5		25	< 5
T116	Tetrahydrofuran	ug/L	1	G2	5			< 5
T116	Toluene	ug/L	1	G2	5		2500	< 5
T116	Total Dissolved Solids	mg/L	1	G1	1421		1200	1180
T116	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
T116	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T116	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
T116	Trichloroethene	ug/L	1	G2	5		25	< 5
T116	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
T116	Vinyl Acetate	ug/L	1	G2	10			< 10
T116	Vinyl Chloride	ug/L	1	G2	10		10	< 2
T116	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
T116	Zinc, dissolved	ug/L	1	G1	9		10000	< 5
T117	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T117	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T117	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T117	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T117	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T117	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T117	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T117	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T117	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T117	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T117	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T117	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T117	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T117	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T117	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T117	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T117	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T117	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T117	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T117	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T117	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T117	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T117	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV		2Q13
T117	2-Chlorotoluene	ug/L	1	G2	5			<	5
T117	2-Hexanone (MBK)	ug/L	1	G2	5			<	10
T117	4-Chlorotoluene	ug/L	1	G2	5			<	5
T117	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			<	10
T117	Acetone	ug/L	1	G2	10		6300	<	10
T117	Acrylonitrile	ug/L	1	G2	100			<	100
T117	Ammonia as N, Diss.	mg/L	1	G1	1.82				0.54
T117	Arsenic, dissolved	ug/L	1	G1	19		200	<	2
T117	Benzene	ug/L	1	G2	5		25	<	5
T117	Boron, dissolved	ug/L	1	G1	1901		2000		80
T117	Bromobenzene	ug/L	1	G2	5			<	5
T117	Bromochloromethane	ug/L	1	G2	5			<	5
T117	Bromodichloromethane	ug/L	1	G2	5			<	5
T117	Bromoform	ug/L	1	G2	5			<	5
T117	Bromomethane	ug/L	1	G2	5			<	5
T117	Cadmium, dissolved	ug/L	1	G1	68		50	<	1
T117	Carbon Disulfide	ug/L	1	G2	5		3500	<	5
T117	Carbon Tetrachloride	ug/L	1	G2	5		25	<	5
T117	Chloride, dissolved	mg/L	1	G1	276				14
T117	Chlorobenzene	ug/L	1	G2	5		500	<	5
T117	Chloroethane	ug/L	1	G2	10			<	10
T117	Chloroform	ug/L	1	G2	5		350	<	5
T117	Chloromethane	ug/L	1	G2	10			<	10
T117	Chromium, dissolved	ug/L	1	G1	3		1000	<	1
T117	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	<	5
T117	cis-1,3-Dichloropropene	ug/L	1	G2	5			<	5
T117	Cyanide, total	mg/L	1	G1	0.005		0.6	<	0.005
T117	Dibromochloromethane	ug/L	1	G2	5			<	5
T117	Dibromomethane	ug/L	1	G2	5			<	5
T117	Dichlorodifluoromethane	ug/L	1	G2	5		7000	<	5
T117	Ethylbenzene	ug/L	1	G2	5		1000	<	5
T117	Hexachlorobutadiene	ug/L	1	G2	10			<	10
T117	Iodomethane	ug/L	1	G2	5			<	5
T117	Isopropylbenzene	ug/L	1	G2	5		3500	<	5
T117	Lead, dissolved	ug/L	1	G1	16		100	<	2
T117	Magnesium, dissolved	mg/L	1	G1	30.9	80.41			63.8
T117	Mercury, dissolved	ug/L	1	G1	0.2		10	<	0.2
T117	Methylene Chloride	ug/L	1	G2	5		50	<	5
T117	Naphthalene	ug/L	1	G2	10		220	<	5
T117	n-Butylbenzene	ug/L	1	G2	5			<	5
T117	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	<	0.1
T117	n-Propylbenzene	ug/L	1	G2	5			<	5
T117	Oil (Hexane Soluble)	mg/L	1	G2	13			<	1
T117	pH (field)	SU	1	G1	7.56 - 8.21	5.42 - 8.05			6.91
T117	Phenolics	ug/L	1	G2	10		100	<	10
T117	p-Isopropyltoluene	ug/L	1	G2	5			<	5
T117	sec-Butylbenzene	ug/L	1	G2	5			<	5
T117	Specific Conductance (field)	umhos/cm	1	G1	2578				715
T117	Styrene	ug/L	1	G2	5		500	<	5
T117	Sulfate, dissolved	mg/L	1	G1	79	606.31			350
T117	tert-Butylbenzene	ug/L	1	G2	5			<	5
T117	Tetrachloroethene	ug/L	1	G2	5		25	<	5
T117	Tetrahydrofuran	ug/L	1	G2	5			<	5
T117	Toluene	ug/L	1	G2	5		2500	<	5
T117	Total Dissolved Solids	mg/L	1	G1	1421		1200		885
T117	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	<	5
T117	trans-1,3-Dichloropropene	ug/L	1	G2	5			<	5
T117	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			<	20
T117	Trichloroethene	ug/L	1	G2	5		25	<	5
T117	Trichlorofluoromethane	ug/L	1	G2	5		10500	<	5
T117	Vinyl Acetate	ug/L	1	G2	10			<	10
T117	Vinyl Chloride	ug/L	1	G2	10		10	<	2
T117	Xylenes (Total)	ug/L	1	G2	5		10000	<	5
T117	Zinc, dissolved	ug/L	1	G1	9		10000	<	5
T118	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			<	5
T118	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	<	5
T118	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			<	5

Notes:
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Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T118	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T118	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T118	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T118	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T118	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T118	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T118	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T118	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T118	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T118	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T118	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T118	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T118	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T118	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T118	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T118	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T118	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T118	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T118	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T118	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T118	2-Chlorotoluene	ug/L	1	G2	5			< 5
T118	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T118	4-Chlorotoluene	ug/L	1	G2	5			< 5
T118	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T118	Acetone	ug/L	1	G2	10		6300	< 10
T118	Acrylonitrile	ug/L	1	G2	100			< 100
T118	Ammonia as N, Diss.	mg/L	1	G1	1.82	16.79		2.78
T118	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T118	Benzene	ug/L	1	G2	5		25	< 5
T118	Boron, dissolved	ug/L	1	G1	1901		2000	100
T118	Bromobenzene	ug/L	1	G2	5			< 5
T118	Bromochloromethane	ug/L	1	G2	5			< 5
T118	Bromodichloromethane	ug/L	1	G2	5			< 5
T118	Bromoform	ug/L	1	G2	5			< 5
T118	Bromomethane	ug/L	1	G2	5			< 5
T118	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T118	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T118	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T118	Chloride, dissolved	mg/L	1	G1	276			55
T118	Chlorobenzene	ug/L	1	G2	5		500	< 5
T118	Chloroethane	ug/L	1	G2	10			< 10
T118	Chloroform	ug/L	1	G2	5		350	< 5
T118	Chloromethane	ug/L	1	G2	10			< 10
T118	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T118	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T118	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T118	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T118	Dibromochloromethane	ug/L	1	G2	5			< 5
T118	Dibromomethane	ug/L	1	G2	5			< 5
T118	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T118	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T118	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T118	Iodomethane	ug/L	1	G2	5			< 5
T118	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
T118	Lead, dissolved	ug/L	1	G1	16		100	< 2
T118	Magnesium, dissolved	mg/L	1	G1	30.9	114.7		39.3
T118	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
T118	Methylene Chloride	ug/L	1	G2	5		50	< 5
T118	Naphthalene	ug/L	1	G2	10		220	< 5
T118	n-Butylbenzene	ug/L	1	G2	5			< 5
T118	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	< 0.1
T118	n-Propylbenzene	ug/L	1	G2	5			< 5
T118	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
T118	pH (field)	SU	1	G1	7.56 - 8.21	6.21 - 7.69		7.12
T118	Phenolics	ug/L	1	G2	10		100	< 10
T118	p-Isopropyltoluene	ug/L	1	G2	5			< 5
T118	sec-Butylbenzene	ug/L	1	G2	5			< 5

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T118	Specific Conductance (field)	umhos/cm	1	G1	2578			641
T118	Styrene	ug/L	1	G2	5		500	< 5
T118	Sulfate, dissolved	mg/L	1	G1	79	4089.09		< 15
T118	tert-Butylbenzene	ug/L	1	G2	5			< 5
T118	Tetrachloroethene	ug/L	1	G2	5		25	< 5
T118	Tetrahydrofuran	ug/L	1	G2	5			< 5
T118	Toluene	ug/L	1	G2	5		2500	< 5
T118	Total Dissolved Solids	mg/L	1	G1	1421	5107.68	1200	550
T118	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
T118	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T118	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
T118	Trichloroethene	ug/L	1	G2	5		25	< 5
T118	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
T118	Vinyl Acetate	ug/L	1	G2	10			< 10
T118	Vinyl Chloride	ug/L	1	G2	10		10	< 2
T118	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
T118	Zinc, dissolved	ug/L	1	G1	9	178.98	10000	< 5
T119	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T119	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T119	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T119	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T119	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T119	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T119	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T119	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T119	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T119	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T119	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T119	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T119	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T119	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T119	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T119	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T119	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T119	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T119	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T119	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T119	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T119	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T119	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T119	2-Chlorotoluene	ug/L	1	G2	5			< 5
T119	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T119	4-Chlorotoluene	ug/L	1	G2	5			< 5
T119	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T119	Acetone	ug/L	1	G2	10		6300	< 10
T119	Acrylonitrile	ug/L	1	G2	100			< 100
T119	Ammonia as N, Diss.	mg/L	1	G1	1.82			0.71
T119	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T119	Benzene	ug/L	1	G2	5		25	< 5
T119	Boron, dissolved	ug/L	1	G1	1901		2000	970
T119	Bromobenzene	ug/L	1	G2	5			< 5
T119	Bromochloromethane	ug/L	1	G2	5			< 5
T119	Bromodichloromethane	ug/L	1	G2	5			< 5
T119	Bromoform	ug/L	1	G2	5			< 5
T119	Bromomethane	ug/L	1	G2	5			< 5
T119	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T119	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T119	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T119	Chloride, dissolved	mg/L	1	G1	276			197
T119	Chlorobenzene	ug/L	1	G2	5		500	< 5
T119	Chloroethane	ug/L	1	G2	10			< 10
T119	Chloroform	ug/L	1	G2	5		350	< 5
T119	Chloromethane	ug/L	1	G2	10			< 10
T119	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T119	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T119	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T119	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV		2Q13
T119	Dibromochloromethane	ug/L	1	G2	5			<	5
T119	Dibromomethane	ug/L	1	G2	5			<	5
T119	Dichlorodifluoromethane	ug/L	1	G2	5		7000	<	5
T119	Ethylbenzene	ug/L	1	G2	5		1000	<	5
T119	Hexachlorobutadiene	ug/L	1	G2	10			<	10
T119	Iodomethane	ug/L	1	G2	5			<	5
T119	Isopropylbenzene	ug/L	1	G2	5		3500	<	5
T119	Lead, dissolved	ug/L	1	G1	16		100	<	2
T119	Magnesium, dissolved	mg/L	1	G1	30.9	56.6			52.7
T119	Mercury, dissolved	ug/L	1	G1	0.2		10	<	0.2
T119	Methylene Chloride	ug/L	1	G2	5		50	<	5
T119	Naphthalene	ug/L	1	G2	10		220	<	5
T119	n-Butylbenzene	ug/L	1	G2	5			<	5
T119	Nitrate as N, dissolved	mg/L	1	G1	1.37		100		0.23
T119	n-Propylbenzene	ug/L	1	G2	5			<	5
T119	Oil (Hexane Soluble)	mg/L	1	G2	13			<	1
T119	pH (field)	SU	1	G1	7.56 - 8.21	6.92 - 7.63			7.44
T119	Phenolics	ug/L	1	G2	10		100	<	10
T119	p-Isopropyltoluene	ug/L	1	G2	5			<	5
T119	sec-Butylbenzene	ug/L	1	G2	5			<	5
T119	Specific Conductance (field)	umhos/cm	1	G1	2578				944
T119	Styrene	ug/L	1	G2	5		500	<	5
T119	Sulfate, dissolved	mg/L	1	G1	79			<	15
T119	tert-Butylbenzene	ug/L	1	G2	5			<	5
T119	Tetrachloroethene	ug/L	1	G2	5		25	<	5
T119	Tetrahydrofuran	ug/L	1	G2	5			<	5
T119	Toluene	ug/L	1	G2	5		2500	<	5
T119	Total Dissolved Solids	mg/L	1	G1	1421		1200		936
T119	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	<	5
T119	trans-1,3-Dichloropropene	ug/L	1	G2	5			<	5
T119	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			<	20
T119	Trichloroethene	ug/L	1	G2	5		25	<	5
T119	Trichlorofluoromethane	ug/L	1	G2	5		10500	<	5
T119	Vinyl Acetate	ug/L	1	G2	10			<	10
T119	Vinyl Chloride	ug/L	1	G2	10		10	<	2
T119	Xylenes (Total)	ug/L	1	G2	5		10000	<	5
T119	Zinc, dissolved	ug/L	1	G1	9		10000	<	5
T120	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			<	5
T120	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	<	5
T120	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			<	5
T120	1,1,2-Trichloroethane	ug/L	1	G2	5		50	<	5
T120	1,1-Dichloroethane	ug/L	1	G2	5		7000	<	5
T120	1,1-Dichloroethene	ug/L	1	G2	5		35	<	5
T120	1,1-Dichloropropene	ug/L	1	G2	5			<	5
T120	1,2,3-Trichlorobenzene	ug/L	1	G2	5			<	5
T120	1,2,3-Trichloropropane	ug/L	1	G2	5			<	5
T120	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	<	5
T120	1,2,4-Trimethylbenzene	ug/L	1	G2	5			<	5
T120	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	<	5
T120	1,2-Dibromoethane	ug/L	1	G2	10		0.5	<	5
T120	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	<	5
T120	1,2-Dichloroethane	ug/L	1	G2	5		25	<	5
T120	1,2-Dichloropropane	ug/L	1	G2	5		25	<	5
T120	1,3,5-Trimethylbenzene	ug/L	1	G2	5			<	5
T120	1,3-Dichlorobenzene	ug/L	1	G2	10			<	5
T120	1,3-Dichloropropane	ug/L	1	G2	5			<	5
T120	1,3-Dichloropropene	ug/L	1	G2	5			<	5
T120	1,4-Dichlorobenzene	ug/L	1	G2	10		375	<	5
T120	2,2-Dichloropropane	ug/L	1	G2	5			<	5
T120	2-Butanone (MEK)	ug/L	1	G2	10		4200	<	10
T120	2-Chlorotoluene	ug/L	1	G2	5			<	5
T120	2-Hexanone (MBK)	ug/L	1	G2	5			<	10
T120	4-Chlorotoluene	ug/L	1	G2	5			<	5
T120	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			<	10
T120	Acetone	ug/L	1	G2	10		6300	<	10
T120	Acrylonitrile	ug/L	1	G2	100			<	100
T120	Ammonia as N, Diss.	mg/L	1	G1	1.82				0.61

Notes:
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Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13	
T120	Arsenic, dissolved	ug/L	1	G1	19		200	<	2
T120	Benzene	ug/L	1	G2	5		25	<	5
T120	Boron, dissolved	ug/L	1	G1	1901		2000		910
T120	Bromobenzene	ug/L	1	G2	5			<	5
T120	Bromochloromethane	ug/L	1	G2	5			<	5
T120	Bromodichloromethane	ug/L	1	G2	5			<	5
T120	Bromoform	ug/L	1	G2	5			<	5
T120	Bromomethane	ug/L	1	G2	5			<	5
T120	Cadmium, dissolved	ug/L	1	G1	68		50	<	1
T120	Carbon Disulfide	ug/L	1	G2	5		3500	<	5
T120	Carbon Tetrachloride	ug/L	1	G2	5		25	<	5
T120	Chloride, dissolved	mg/L	1	G1	276				69
T120	Chlorobenzene	ug/L	1	G2	5		500	<	5
T120	Chloroethane	ug/L	1	G2	10			<	10
T120	Chloroform	ug/L	1	G2	5		350	<	5
T120	Chloromethane	ug/L	1	G2	10			<	10
T120	Chromium, dissolved	ug/L	1	G1	3		1000	<	1
T120	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	<	5
T120	cis-1,3-Dichloropropene	ug/L	1	G2	5			<	5
T120	Cyanide, total	mg/L	1	G1	0.005		0.6	<	0.005
T120	Dibromochloromethane	ug/L	1	G2	5			<	5
T120	Dibromomethane	ug/L	1	G2	5			<	5
T120	Dichlorodifluoromethane	ug/L	1	G2	5		7000	<	5
T120	Ethylbenzene	ug/L	1	G2	5		1000	<	5
T120	Hexachlorobutadiene	ug/L	1	G2	10			<	10
T120	Iodomethane	ug/L	1	G2	5			<	5
T120	Isopropylbenzene	ug/L	1	G2	5		3500	<	5
T120	Lead, dissolved	ug/L	1	G1	16		100	<	2
T120	Magnesium, dissolved	mg/L	1	G1	30.9				13.8
T120	Mercury, dissolved	ug/L	1	G1	0.2		10	<	0.2
T120	Methylene Chloride	ug/L	1	G2	5		50	<	5
T120	Naphthalene	ug/L	1	G2	10		220	<	5
T120	n-Butylbenzene	ug/L	1	G2	5			<	5
T120	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	<	0.1
T120	n-Propylbenzene	ug/L	1	G2	5			<	5
T120	Oil (Hexane Soluble)	mg/L	1	G2	13			<	1
T120	pH (field)	SU	1	G1	7.56 - 8.21				7.78
T120	Phenolics	ug/L	1	G2	10		100	<	10
T120	p-Isopropyltoluene	ug/L	1	G2	5			<	5
T120	sec-Butylbenzene	ug/L	1	G2	5			<	5
T120	Specific Conductance (field)	umhos/cm	1	G1	2578				703
T120	Styrene	ug/L	1	G2	5		500	<	5
T120	Sulfate, dissolved	mg/L	1	G1	79			<	15
T120	tert-Butylbenzene	ug/L	1	G2	5			<	5
T120	Tetrachloroethene	ug/L	1	G2	5		25	<	5
T120	Tetrahydrofuran	ug/L	1	G2	5			<	5
T120	Toluene	ug/L	1	G2	5		2500	<	5
T120	Total Dissolved Solids	mg/L	1	G1	1421		1200		547
T120	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	<	5
T120	trans-1,3-Dichloropropene	ug/L	1	G2	5			<	5
T120	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			<	20
T120	Trichloroethene	ug/L	1	G2	5		25	<	5
T120	Trichlorofluoromethane	ug/L	1	G2	5		10500	<	5
T120	Vinyl Acetate	ug/L	1	G2	10			<	10
T120	Vinyl Chloride	ug/L	1	G2	10		10	<	2
T120	Xylenes (Total)	ug/L	1	G2	5		10000	<	5
T120	Zinc, dissolved	ug/L	1	G1	9		10000	<	5
T121	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			<	5
T121	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	<	5
T121	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			<	5
T121	1,1,2-Trichloroethane	ug/L	1	G2	5		50	<	5
T121	1,1-Dichloroethane	ug/L	1	G2	5		7000	<	5
T121	1,1-Dichloroethene	ug/L	1	G2	5		35	<	5
T121	1,1-Dichloropropene	ug/L	1	G2	5			<	5
T121	1,2,3-Trichlorobenzene	ug/L	1	G2	5			<	5
T121	1,2,3-Trichloropropane	ug/L	1	G2	5			<	5
T121	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	<	5

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T121	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T121	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T121	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T121	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T121	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T121	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T121	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T121	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T121	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T121	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T121	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T121	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T121	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T121	2-Chlorotoluene	ug/L	1	G2	5			< 5
T121	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T121	4-Chlorotoluene	ug/L	1	G2	5			< 5
T121	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T121	Acetone	ug/L	1	G2	10		6300	< 10
T121	Acrylonitrile	ug/L	1	G2	100			< 100
T121	Ammonia as N, Diss.	mg/L	1	G1	1.82			0.41
T121	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T121	Benzene	ug/L	1	G2	5		25	< 5
T121	Boron, dissolved	ug/L	1	G1	1901		2000	1210
T121	Bromobenzene	ug/L	1	G2	5			< 5
T121	Bromochloromethane	ug/L	1	G2	5			< 5
T121	Bromodichloromethane	ug/L	1	G2	5			< 5
T121	Bromoform	ug/L	1	G2	5			< 5
T121	Bromomethane	ug/L	1	G2	5			< 5
T121	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T121	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T121	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T121	Chloride, dissolved	mg/L	1	G1	276	497.49		440
T121	Chlorobenzene	ug/L	1	G2	5		500	< 5
T121	Chloroethane	ug/L	1	G2	10			< 10
T121	Chloroform	ug/L	1	G2	5		350	< 5
T121	Chloromethane	ug/L	1	G2	10			< 10
T121	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T121	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T121	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T121	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T121	Dibromochloromethane	ug/L	1	G2	5			< 5
T121	Dibromomethane	ug/L	1	G2	5			< 5
T121	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T121	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T121	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T121	Iodomethane	ug/L	1	G2	5			< 5
T121	Isopropylbenzene	ug/L	1	G2	5		3500	< 5
T121	Lead, dissolved	ug/L	1	G1	16		100	< 2
T121	Magnesium, dissolved	mg/L	1	G1	30.9			3.3
T121	Mercury, dissolved	ug/L	1	G1	0.2		10	< 0.2
T121	Methylene Chloride	ug/L	1	G2	5		50	< 5
T121	Naphthalene	ug/L	1	G2	10		220	< 5
T121	n-Butylbenzene	ug/L	1	G2	5			< 5
T121	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	< 0.1
T121	n-Propylbenzene	ug/L	1	G2	5			< 5
T121	Oil (Hexane Soluble)	mg/L	1	G2	13			< 1
T121	pH (field)	SU	1	G1	7.56 - 8.21	6.9 - 9.81		8.1
T121	Phenolics	ug/L	1	G2	10		100	< 10
T121	p-Isopropyltoluene	ug/L	1	G2	5			< 5
T121	sec-Butylbenzene	ug/L	1	G2	5			< 5
T121	Specific Conductance (field)	umhos/cm	1	G1	2578			1739
T121	Styrene	ug/L	1	G2	5		500	< 5
T121	Sulfate, dissolved	mg/L	1	G1	79			< 15
T121	tert-Butylbenzene	ug/L	1	G2	5			< 5
T121	Tetrachloroethene	ug/L	1	G2	5		25	< 5
T121	Tetrahydrofuran	ug/L	1	G2	5			< 5
T121	Toluene	ug/L	1	G2	5		2500	< 5

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
T121	Total Dissolved Solids	mg/L	1	G1	1421		1200	1320
T121	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	< 5
T121	trans-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T121	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			< 20
T121	Trichloroethene	ug/L	1	G2	5		25	< 5
T121	Trichlorofluoromethane	ug/L	1	G2	5		10500	< 5
T121	Vinyl Acetate	ug/L	1	G2	10			< 10
T121	Vinyl Chloride	ug/L	1	G2	10		10	< 2
T121	Xylenes (Total)	ug/L	1	G2	5		10000	< 5
T121	Zinc, dissolved	ug/L	1	G1	9		10000	< 5
T122	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T122	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	< 5
T122	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			< 5
T122	1,1,2-Trichloroethane	ug/L	1	G2	5		50	< 5
T122	1,1-Dichloroethane	ug/L	1	G2	5		7000	< 5
T122	1,1-Dichloroethene	ug/L	1	G2	5		35	< 5
T122	1,1-Dichloropropene	ug/L	1	G2	5			< 5
T122	1,2,3-Trichlorobenzene	ug/L	1	G2	5			< 5
T122	1,2,3-Trichloropropane	ug/L	1	G2	5			< 5
T122	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	< 5
T122	1,2,4-Trimethylbenzene	ug/L	1	G2	5			< 5
T122	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	< 5
T122	1,2-Dibromoethane	ug/L	1	G2	10		0.5	< 5
T122	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	< 5
T122	1,2-Dichloroethane	ug/L	1	G2	5		25	< 5
T122	1,2-Dichloropropane	ug/L	1	G2	5		25	< 5
T122	1,3,5-Trimethylbenzene	ug/L	1	G2	5			< 5
T122	1,3-Dichlorobenzene	ug/L	1	G2	10			< 5
T122	1,3-Dichloropropane	ug/L	1	G2	5			< 5
T122	1,3-Dichloropropene	ug/L	1	G2	5			< 5
T122	1,4-Dichlorobenzene	ug/L	1	G2	10		375	< 5
T122	2,2-Dichloropropane	ug/L	1	G2	5			< 5
T122	2-Butanone (MEK)	ug/L	1	G2	10		4200	< 10
T122	2-Chlorotoluene	ug/L	1	G2	5			< 5
T122	2-Hexanone (MBK)	ug/L	1	G2	5			< 10
T122	4-Chlorotoluene	ug/L	1	G2	5			< 5
T122	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			< 10
T122	Acetone	ug/L	1	G2	10		6300	< 10
T122	Acrylonitrile	ug/L	1	G2	100			< 100
T122	Ammonia as N, Diss.	mg/L	1	G1	1.82			0.72
T122	Arsenic, dissolved	ug/L	1	G1	19		200	< 2
T122	Benzene	ug/L	1	G2	5		25	< 5
T122	Boron, dissolved	ug/L	1	G1	1901		2000	1020
T122	Bromobenzene	ug/L	1	G2	5			< 5
T122	Bromochloromethane	ug/L	1	G2	5			< 5
T122	Bromodichloromethane	ug/L	1	G2	5			< 5
T122	Bromoform	ug/L	1	G2	5			< 5
T122	Bromomethane	ug/L	1	G2	5			< 5
T122	Cadmium, dissolved	ug/L	1	G1	68		50	< 1
T122	Carbon Disulfide	ug/L	1	G2	5		3500	< 5
T122	Carbon Tetrachloride	ug/L	1	G2	5		25	< 5
T122	Chloride, dissolved	mg/L	1	G1	276			9
T122	Chlorobenzene	ug/L	1	G2	5		500	< 5
T122	Chloroethane	ug/L	1	G2	10			< 10
T122	Chloroform	ug/L	1	G2	5		350	< 5
T122	Chloromethane	ug/L	1	G2	10			< 10
T122	Chromium, dissolved	ug/L	1	G1	3		1000	< 1
T122	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	< 5
T122	cis-1,3-Dichloropropene	ug/L	1	G2	5			< 5
T122	Cyanide, total	mg/L	1	G1	0.005		0.6	< 0.005
T122	Dibromochloromethane	ug/L	1	G2	5			< 5
T122	Dibromomethane	ug/L	1	G2	5			< 5
T122	Dichlorodifluoromethane	ug/L	1	G2	5		7000	< 5
T122	Ethylbenzene	ug/L	1	G2	5		1000	< 5
T122	Hexachlorobutadiene	ug/L	1	G2	10			< 10
T122	Iodomethane	ug/L	1	G2	5			< 5
T122	Isopropylbenzene	ug/L	1	G2	5		3500	< 5

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV		2Q13
T122	Lead, dissolved	ug/L	1	G1	16		100	<	2
T122	Magnesium, dissolved	mg/L	1	G1	30.9				8.4
T122	Mercury, dissolved	ug/L	1	G1	0.2		10	<	0.2
T122	Methylene Chloride	ug/L	1	G2	5		50	<	5
T122	Naphthalene	ug/L	1	G2	10		220	<	5
T122	n-Butylbenzene	ug/L	1	G2	5			<	5
T122	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	<	0.1
T122	n-Propylbenzene	ug/L	1	G2	5			<	5
T122	Oil (Hexane Soluble)	mg/L	1	G2	13			<	1
T122	pH (field)	SU	1	G1	7.56 - 8.21				7.85
T122	Phenolics	ug/L	1	G2	10		100	<	10
T122	p-Isopropyltoluene	ug/L	1	G2	5			<	5
T122	sec-Butylbenzene	ug/L	1	G2	5			<	5
T122	Specific Conductance (field)	umhos/cm	1	G1	2578				533
T122	Styrene	ug/L	1	G2	5		500	<	5
T122	Sulfate, dissolved	mg/L	1	G1	79			<	15
T122	tert-Butylbenzene	ug/L	1	G2	5			<	5
T122	Tetrachloroethene	ug/L	1	G2	5		25	<	5
T122	Tetrahydrofuran	ug/L	1	G2	5			<	5
T122	Toluene	ug/L	1	G2	5		2500	<	5
T122	Total Dissolved Solids	mg/L	1	G1	1421		1200		347
T122	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	<	5
T122	trans-1,3-Dichloropropene	ug/L	1	G2	5			<	5
T122	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			<	20
T122	Trichloroethene	ug/L	1	G2	5		25	<	5
T122	Trichlorofluoromethane	ug/L	1	G2	5		10500	<	5
T122	Vinyl Acetate	ug/L	1	G2	10			<	10
T122	Vinyl Chloride	ug/L	1	G2	10		10	<	2
T122	Xylenes (Total)	ug/L	1	G2	5		10000	<	5
T122	Zinc, dissolved	ug/L	1	G1	9		10000	<	5
T123	1,1,1,2-Tetrachloroethane	ug/L	1	G2	5			<	5
T123	1,1,1-Trichloroethane	ug/L	1	G2	5		1000	<	5
T123	1,1,2,2-Tetrachloroethane	ug/L	1	G2	5			<	5
T123	1,1,2-Trichloroethane	ug/L	1	G2	5		50	<	5
T123	1,1-Dichloroethane	ug/L	1	G2	5		7000	<	5
T123	1,1-Dichloroethene	ug/L	1	G2	5		35	<	5
T123	1,1-Dichloropropene	ug/L	1	G2	5			<	5
T123	1,2,3-Trichlorobenzene	ug/L	1	G2	5			<	5
T123	1,2,3-Trichloropropane	ug/L	1	G2	5			<	5
T123	1,2,4-Trichlorobenzene	ug/L	1	G2	5		700	<	5
T123	1,2,4-Trimethylbenzene	ug/L	1	G2	5			<	5
T123	1,2-Dibromo-3-chloropropane	ug/L	1	G2	10		2	<	5
T123	1,2-Dibromoethane	ug/L	1	G2	10		0.5	<	5
T123	1,2-Dichlorobenzene	ug/L	1	G2	10		1500	<	5
T123	1,2-Dichloroethane	ug/L	1	G2	5		25	<	5
T123	1,2-Dichloropropane	ug/L	1	G2	5		25	<	5
T123	1,3,5-Trimethylbenzene	ug/L	1	G2	5			<	5
T123	1,3-Dichlorobenzene	ug/L	1	G2	10			<	5
T123	1,3-Dichloropropane	ug/L	1	G2	5			<	5
T123	1,3-Dichloropropene	ug/L	1	G2	5			<	5
T123	1,4-Dichlorobenzene	ug/L	1	G2	10		375	<	5
T123	2,2-Dichloropropane	ug/L	1	G2	5			<	5
T123	2-Butanone (MEK)	ug/L	1	G2	10		4200	<	10
T123	2-Chlorotoluene	ug/L	1	G2	5			<	5
T123	2-Hexanone (MBK)	ug/L	1	G2	5			<	10
T123	4-Chlorotoluene	ug/L	1	G2	5			<	5
T123	4-Methyl-2-pentanone (MIBK)	ug/L	1	G2	5			<	10
T123	Acetone	ug/L	1	G2	10		6300	<	10
T123	Acrylonitrile	ug/L	1	G2	100			<	100
T123	Ammonia as N, Diss.	mg/L	1	G1	1.82				1.02
T123	Arsenic, dissolved	ug/L	1	G1	19		200	<	2
T123	Benzene	ug/L	1	G2	5		25	<	5
T123	Boron, dissolved	ug/L	1	G1	1901		2000		1200
T123	Bromobenzene	ug/L	1	G2	5			<	5
T123	Bromochloromethane	ug/L	1	G2	5			<	5
T123	Bromodichloromethane	ug/L	1	G2	5			<	5
T123	Bromoform	ug/L	1	G2	5			<	5

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

Table 1A
Brickyard Disposal and Recycling
Second Quarter 2013 Analytical Data

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13	
T123	Bromomethane	ug/L	1	G2	5			<	5
T123	Cadmium, dissolved	ug/L	1	G1	68		50	<	1
T123	Carbon Disulfide	ug/L	1	G2	5		3500	<	5
T123	Carbon Tetrachloride	ug/L	1	G2	5		25	<	5
T123	Chloride, dissolved	mg/L	1	G1	276				22
T123	Chlorobenzene	ug/L	1	G2	5		500	<	5
T123	Chloroethane	ug/L	1	G2	10			<	10
T123	Chloroform	ug/L	1	G2	5		350	<	5
T123	Chloromethane	ug/L	1	G2	10			<	10
T123	Chromium, dissolved	ug/L	1	G1	3		1000	<	1
T123	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	<	5
T123	cis-1,3-Dichloropropene	ug/L	1	G2	5			<	5
T123	Cyanide, total	mg/L	1	G1	0.005		0.6	<	0.005
T123	Dibromochloromethane	ug/L	1	G2	5			<	5
T123	Dibromomethane	ug/L	1	G2	5			<	5
T123	Dichlorodifluoromethane	ug/L	1	G2	5		7000	<	5
T123	Ethylbenzene	ug/L	1	G2	5		1000	<	5
T123	Hexachlorobutadiene	ug/L	1	G2	10			<	10
T123	Iodomethane	ug/L	1	G2	5			<	5
T123	Isopropylbenzene	ug/L	1	G2	5		3500	<	5
T123	Lead, dissolved	ug/L	1	G1	16		100	<	2
T123	Magnesium, dissolved	mg/L	1	G1	30.9				12.2
T123	Mercury, dissolved	ug/L	1	G1	0.2		10	<	0.2
T123	Methylene Chloride	ug/L	1	G2	5		50	<	5
T123	Naphthalene	ug/L	1	G2	10		220	<	5
T123	n-Butylbenzene	ug/L	1	G2	5			<	5
T123	Nitrate as N, dissolved	mg/L	1	G1	1.37		100	<	0.1
T123	n-Propylbenzene	ug/L	1	G2	5			<	5
T123	Oil (Hexane Soluble)	mg/L	1	G2	13			<	1
T123	pH (field)	SU	1	G1	7.56 - 8.21				7.56
T123	Phenolics	ug/L	1	G2	10		100	<	10
T123	p-Isopropyltoluene	ug/L	1	G2	5			<	5
T123	sec-Butylbenzene	ug/L	1	G2	5			<	5
T123	Specific Conductance (field)	umhos/cm	1	G1	2578				562
T123	Styrene	ug/L	1	G2	5		500	<	5
T123	Sulfate, dissolved	mg/L	1	G1	79			<	15
T123	tert-Butylbenzene	ug/L	1	G2	5			<	5
T123	Tetrachloroethene	ug/L	1	G2	5		25	<	5
T123	Tetrahydrofuran	ug/L	1	G2	5			<	5
T123	Toluene	ug/L	1	G2	5		2500	<	5
T123	Total Dissolved Solids	mg/L	1	G1	1421		1200		233
T123	trans-1,2-Dichloroethene	ug/L	1	G2	5		500	<	5
T123	trans-1,3-Dichloropropene	ug/L	1	G2	5			<	5
T123	trans-1,4-Dichloro-2-butene	ug/L	1	G2	10			<	20
T123	Trichloroethene	ug/L	1	G2	5		25	<	5
T123	Trichlorofluoromethane	ug/L	1	G2	5		10500	<	5
T123	Vinyl Acetate	ug/L	1	G2	10			<	10
T123	Vinyl Chloride	ug/L	1	G2	10		10	<	2
T123	Xylenes (Total)	ug/L	1	G2	5		10000	<	5
T123	Zinc, dissolved	ug/L	1	G1	9		10000	<	5

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).

EXHIBIT D

Table 1B
Brickyard Disposal and Recycling
Second Quarter 2013 Exceedences

Well	Parameter	Units	Unit	GW List	Interwell	Intrawell	Class IV	2Q13
A126	cis-1,2-Dichloroethene	ug/L	1	G2	5		200	8.8
G125	Ammonia as N, Diss.	mg/L	1	G1	1.82	5.04		16.2
G125	Ammonia as N, total	mg/L	1		1.75	3.92		16.9
G125	Magnesium, total	mg/L	1		43.52	226.99		251
G130	pH (field)	SU	1	G1	7.56 - 8.21			7.26
G131	Nitrate as N, dissolved	mg/L	1	G1	1.37	0.1	100	2.31
G133	pH (field)	SU	1	G1	7.56 - 8.21			6.98
G133	Sulfate, dissolved	mg/L	1	G1	79			89
G134	Magnesium, dissolved	mg/L	1	G1	30.9	39.61		109
G134	pH (field)	SU	1	G1	7.56 - 8.21			6.75
G134	Sulfate, dissolved	mg/L	1	G1	79			335
R103	pH (field)	SU	1	G1	7.38 - 7.61		6.5 - 9	6.73
R106	Zinc, dissolved	ug/L	1	G1	9	9	10000	15
R123	Ammonia as N, Diss.	mg/L	1	G1	1.82	1.28		7.28
R123	Chloride, dissolved	mg/L	1	G1	276	274.64		460
R124	Ammonia as N, total	mg/L	1		1.75	53.5		60.9
R124	Boron, dissolved	ug/L	1	G1	1901	2125	2000	2620
R124	Boron, total	ug/L	1		1200	1230	2000	2450
R124	Calcium, total	mg/L	1		228	279.16		555
R124	Chemical Oxygen Demand	mg/L	1		97	116		139
R124	Magnesium, total	mg/L	1		43.52	136.98		298
R124	Potassium, total	mg/L	1		36	66.99		140
R124	Total Dissolved Solids	mg/L	1	G1	1421	1904.15	1200	1920
R127	Calcium, total	mg/L	1		228	178.5		388
R127	Chloride, dissolved	mg/L	1	G1	276	329.52		399
R127	Chloride, total	mg/L	1		292	326.6		418
R127	Magnesium, dissolved	mg/L	1	G1	30.9	148.8		158
R127	Magnesium, total	mg/L	1		43.52	122.44		237
R127	Manganese, total	ug/L	1		2150	2514.41		4000
R132	Magnesium, dissolved	mg/L	1	G1	30.9	113.8		114
T101	Magnesium, dissolved	mg/L	1	G1	30.9			146
T101	pH (field)	SU	1	G1	7.56 - 8.21			6.84
T101	Sulfate, dissolved	mg/L	1	G1	79			1340
T101	Total Dissolved Solids	mg/L	1	G1	1421		1200	2980
T103	Magnesium, dissolved	mg/L	1	G1	30.9			49.8
T103	pH (field)	SU	1	G1	7.56 - 8.21			7.07
T103	Sulfate, dissolved	mg/L	1	G1	79			102
T103	Sulfate, total	mg/L	1		79			100
T104	Ammonia as N, Diss.	mg/L	1	G1	1.82			2.56
T104	Boron, dissolved	ug/L	1	G1	1901		2000	1980
T104	Magnesium, dissolved	mg/L	1	G1	30.9			158
T104	pH (field)	SU	1	G1	7.56 - 8.21			6.83
T104	Sulfate, dissolved	mg/L	1	G1	79			1920
T104	Sulfate, total	mg/L	1		79			1790
T104	Total Dissolved Solids	mg/L	1	G1	1421		1200	4040
T110	Magnesium, dissolved	mg/L	1	G1	30.9			145
T110	pH (field)	SU	1	G1	7.56 - 8.21			6.73
T110	Sulfate, dissolved	mg/L	1	G1	79			1240
T110	Sulfate, total	mg/L	1		79			1160
T110	Total Dissolved Solids	mg/L	1	G1	1421		1200	2410
T111	Magnesium, dissolved	mg/L	1	G1	30.9			147
T111	Manganese, total	ug/L	1		2150			8150
T111	pH (field)	SU	1	G1	7.56 - 8.21			5.92
T111	Sulfate, dissolved	mg/L	1	G1	79			1920
T111	Sulfate, total	mg/L	1		79			2050
T111	Total Dissolved Solids	mg/L	1	G1	1421		1200	3260
T111	Zinc, dissolved	ug/L	1	G1	9		10000	146
T113	Ammonia as N, Diss.	mg/L	1	G1	1.82			2.41
T113	Magnesium, dissolved	mg/L	1	G1	30.9			170
T113	Manganese, total	ug/L	1		2150			20600
T113	pH (field)	SU	1	G1	7.56 - 8.21			6.72
T113	Sulfate, dissolved	mg/L	1	G1	79			520
T113	Sulfate, total	mg/L	1		79			530
T113	Total Dissolved Solids	mg/L	1	G1	1421		1200	1900
T113	Total Organic Carbon	mg/L	1		11.9			24
T114	Manganese, total	ug/L	1		2150			8340
T114	Tetrahydrofuran	ug/L	1	G2	5			20.3
T115	Manganese, total	ug/L	1		2150			5560
T115	Sulfate, total	mg/L	1		79			480

Notes:
A highlighted cell indicates an exceedence of the Interwell, Intrawell and/ or Class IV standard per Permit Condition VIII.A.13 (Mod 98).
Andrews Engineering, Inc.

EXHIBIT D

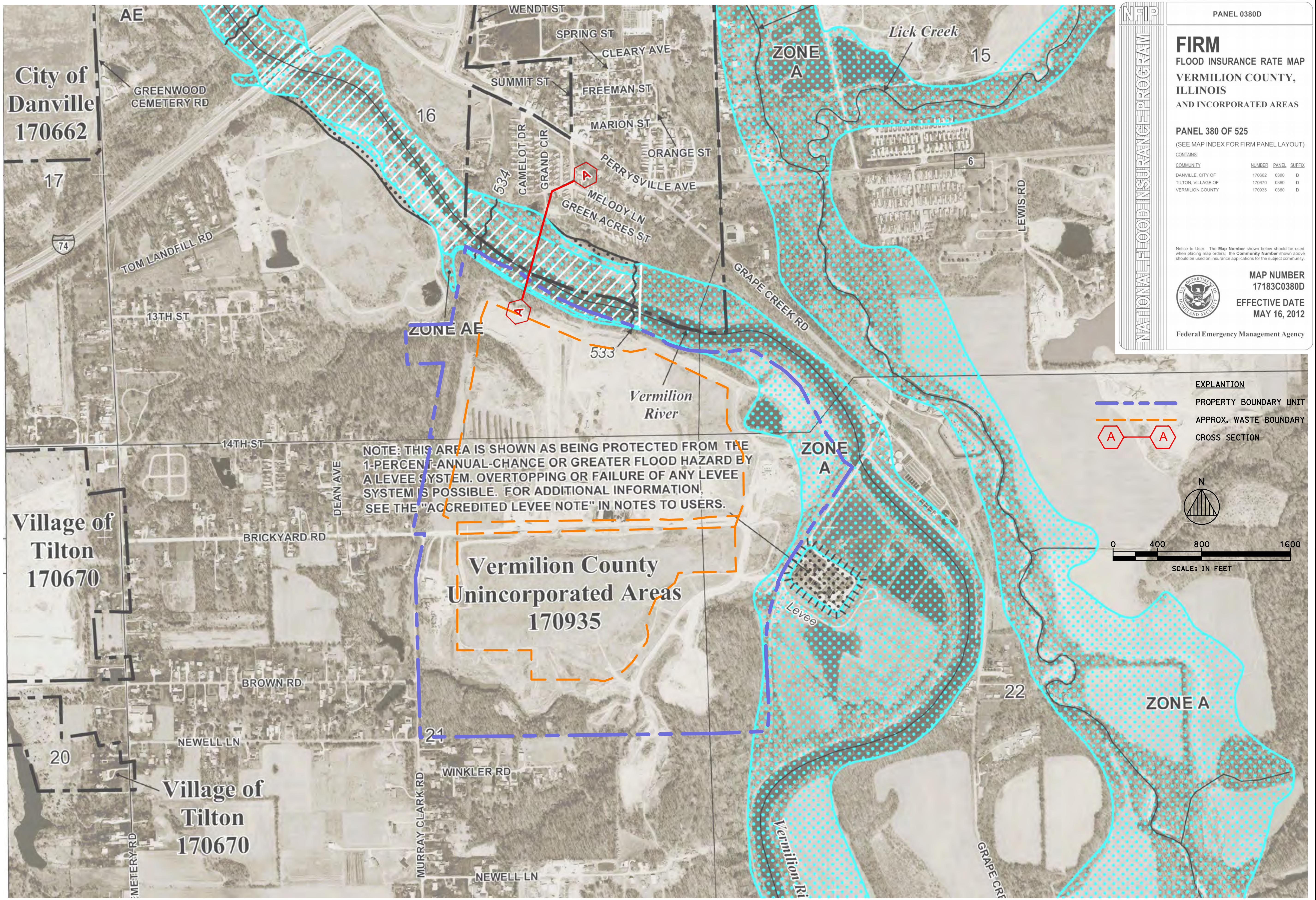
Table 2A
Brickyard Disposal and Recycling
Permit Modification History - Background Revisions

Modification No.	Issue Date	LOG #	DESCRIPTION
10	10/15/1997	1997-020	Approves AGQS and MAPC's for Unit II groundwater monitoring wells, approves the abandonment of 2 wells, added background values for Unit I wells to the permit, and added 2 additional Unit I, up-gradient wells.
13	7/23/1998	1998-067	Approved continued assessment monitoring, the addition of revised background values for the coal unit groundwater monitoring wells, and added intrawell and interwell background values for the Sand Unit groundwater monitoring well G21S.
23	2/25/2000	1999-289	Approves intrawell background values for inorganic parameters for coal unit wells which were submitted as required by special condition 12.A.17 of Modification No. 19.
27	9/12/2000	2000-242	Approves background values for wells R132, G33S and R106.
31	8/3/2001	2001-151	Approved the addition of 8 gas wells to Unit I, reduced the assessment monitoring constituents list and 2 intrawell values at wells G115 and G118.
33	1/15/2002	2001-234	Approved intrawell values proposed in Log No. 2001-378.
44	3/23/2004	2003-413	Approved inorganic intrawell values for Unit I well G34S.
56	7/13/2006	2006-117 2006-118	Approves: A) the ERA report, B) assessment of exceeding inorganic constituents in the Groundwater Management Zone (GMZ), C) return to detection monitoring at well G147, D) and redevelopment of interwell values for dissolved zinc and boron.
58	8/2/2007	2007-146	Approved AGQS's and MAPC's for dissolved zinc and dissolved boron.
71	11/20/2009	2009-261	Approved a revised intrawell background value for dissolved zinc at groundwater monitoring well G115.
72	2/4/2010	2009-326	Address Conditions VIII 21 and 22 and VIII.B.24 and 26 in Modification No. 65, dated March 4, 2009. Established new interwell prediction values.
78	12/17/2010	2010-465	Revising intrawell background values as per Permit Condition VIII.A.21.

EXHIBIT D

Table 2A
Brickyard Disposal and Recycling
Permit Modification History - Background Revisions

Modification No.	Issue Date	LOG #	DESCRIPTION
82	7/27/2011	2010-472	Approved an Alternate Source Demonstration for 2nd quarter 2010 confirmed increases including intrawell values at T117 and T118.
		2011-007	Approved an Alternate Source Demonstration for 3rd quarter 2010 confirmed increases including intrawell values at T116, T119, and T121.
86	5/14/2012	2012-055	Approved application for significant permit modification to address permit condition VIII.24 Unit II, monitoring wells R046 and G047.
88	6/15/2012	2012-098	Approved application for significant permit modification to address permit condition VIII.21 Unit I, Monitoring Well G35S.
91	8/27/2012	2012-222	Approves application for significant permit modification to assess confirmed exceedences from 4th quarter 2011 sampling event.
92	12/3/2012	2012-428	Condition VIII.A.22 (Modification No. 44) and the development of intrawell background values for select parameters at T114 and T115.
93	3/6/2013	2012-535	Application for significant modification to address permit condition VIII.23 Unit 1 Monitoring Well A126.
95	4/24/2013	2013-034	Alternate source demonstration for third quarter 2012 confirmed exceedences of total dissolved solids at wells T114 and T118.
96	5/22/2013	2012-575	Assessment monitoring plan for G34S.
97	7/10/2013	2013-143	Alternate Source Demonstration for Fourth Quarter 2012 confirmed exceedences, including development of intrawell vlues for dissolved magnesium at R132 and dissolved zinc at G039.
		2013-154	Annual evaluation of remedial activities in accordance with Permit Condition IX.5 (Modification No. 92).
		2013-155	Assessment monitoring plan for G35S.
		2013-159	Alternate source demonstration for fourth quarter 2012 confirmed exceedence of phenolics at T114, including development of an intrawell value.
98	8/19/2013	2013-147	Approved intrawell value for dissolved magnesium at R046.



REVISIONS

NO.	DATE	DESCRIPTION	BY

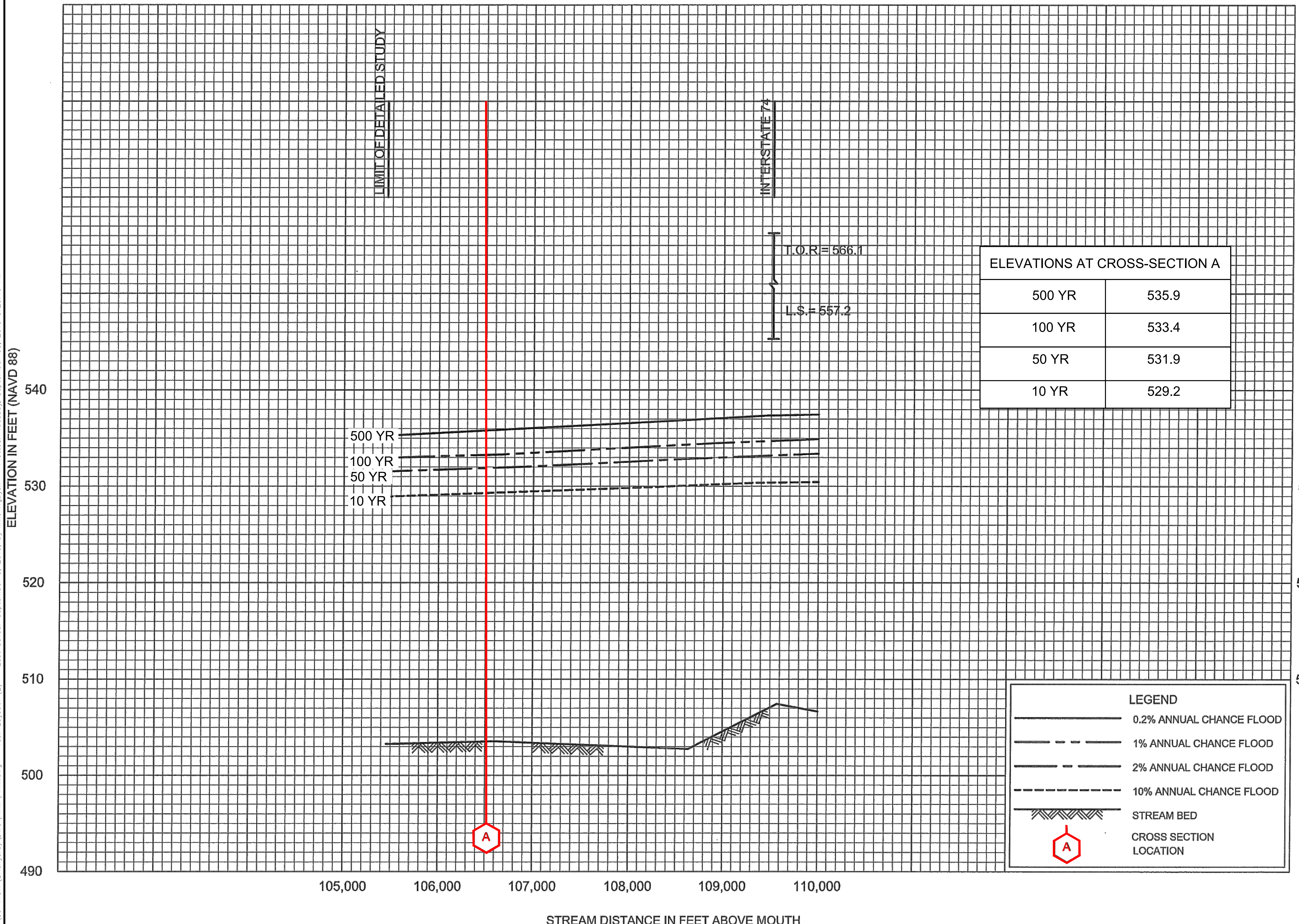
ANDREWS ENGINEERING, INC.
3300 Ginger Creek Drive, Springfield, IL 62711-7233
Tel (217) 787-2334 Fax (217) 787-9495
Pontiac, IL • Naperville, IL • Indianapolis, IN • Warrenton, MO
Professional Design Engineering and Land Surveying Firm #184-001541

APPROVED BY: BJH
DESIGNED BY: BJH
DRAWN BY: MPN

CROSS-SECTION LOCATION MAP

PLANS PREPARED FOR
BRICKYARD DISPOSAL & RECYCLING
DANVILLE, ILLINOIS

DATE: SEPTEMBER 2013
PROJECT ID: 1989-115A
SHEET NUMBER:
FIG. 1



ELEVATIONS AT CROSS-SECTION A	
500 YR	535.9
100 YR	533.4
50 YR	531.9
10 YR	529.2

FLOOD PROFILES
VERMILION RIVER

FEDERAL EMERGENCY MANAGEMENT AGENCY
VERMILION COUNTY, IL
AND INCORPORATED AREAS

10P

REVISIONS
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ANDREWS ENGINEERING, INC.
3300 Ginger Creek Drive, Springfield, IL 62711-7233
Tel (217) 787-2334 Fax (217) 787-9495
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APPROVED BY: BJH DESIGNED BY: BJH DRAWN BY: MPN

CROSS-SECTION A
PLANS PREPARED FOR
BRICKYARD DISPOSAL & RECYCLING
DANVILLE, ILLINOIS

DATE: SEPTEMBER 2013
PROJECT ID: 1989-115A
SHEET NUMBER:

FIG. 2

FLOODING SOURCE		FLOODWAY			1-PERCENT-ANNUAL-CHANCE FLOOD WATER SURFACE ELEVATION (FEET NAVD88)			
CROSS SECTION	DISTANCE	WIDTH (FEET)	SECTION AREA (SQUARE FEET)	MEAN VELOCITY (FEET PER SECOND)	REGULATORY	WITHOUT FLOODWAY	WITH FLOODWAY	INCREASE
Vermilion River								
A	106,526 [1]	460	8,326	5.0	533.4	533.4	533.5	0.1
B	112,266 [1]	458	8,008	5.2	535.3	535.3	535.4	0.1
C	113,856 [1]	493	6,531	6.3	535.7	535.7	535.8	0.1
D	114,896 [1]	495	8,506	4.9	536.6	536.6	536.7	0.1
E	116,386 [1]	621	9,330	4.4	537.1	537.1	537.2	0.1
F	117,806 [1]	450	7,021	5.9	537.4	537.4	537.5	0.1
G	119,737 [1]	338	4,487	7.4	538.6	538.6	538.7	0.1
H	120,507 [1]	873	13,260	2.5	539.3	539.3	539.4	0.1
I	121,987 [1]	822	8,086	4.0	540.4	540.4	540.5	0.1
J	124,097 [1]	555	8,147	3.9	540.9	540.9	541.0	0.1
K	124,407 [1]	479	7,845	4.1	541.0	541.0	541.1	0.1
L	125,147 [1]	616	9,272	3.4	541.3	541.3	541.4	0.1
M	126,457 [1]	648	8,364	3.8	541.6	541.6	541.7	0.1
West Branch Koehn Creek								
A	677 [2]	510	906	0.6	644.4	644.4	644.5	0.1
B	927 [2]	333	274	2.0	644.8	644.8	644.9	0.1
C	1,509 [2]	43	100	5.4	648.6	648.6	648.7	0.1
D	2,569 [2]	164	208	2.6	653.8	653.8	653.9	0.1

[1] Feet above mouth
[2] Feet above confluence with Koehn Creek

FEDERAL EMERGENCY MANAGEMENT AGENCY

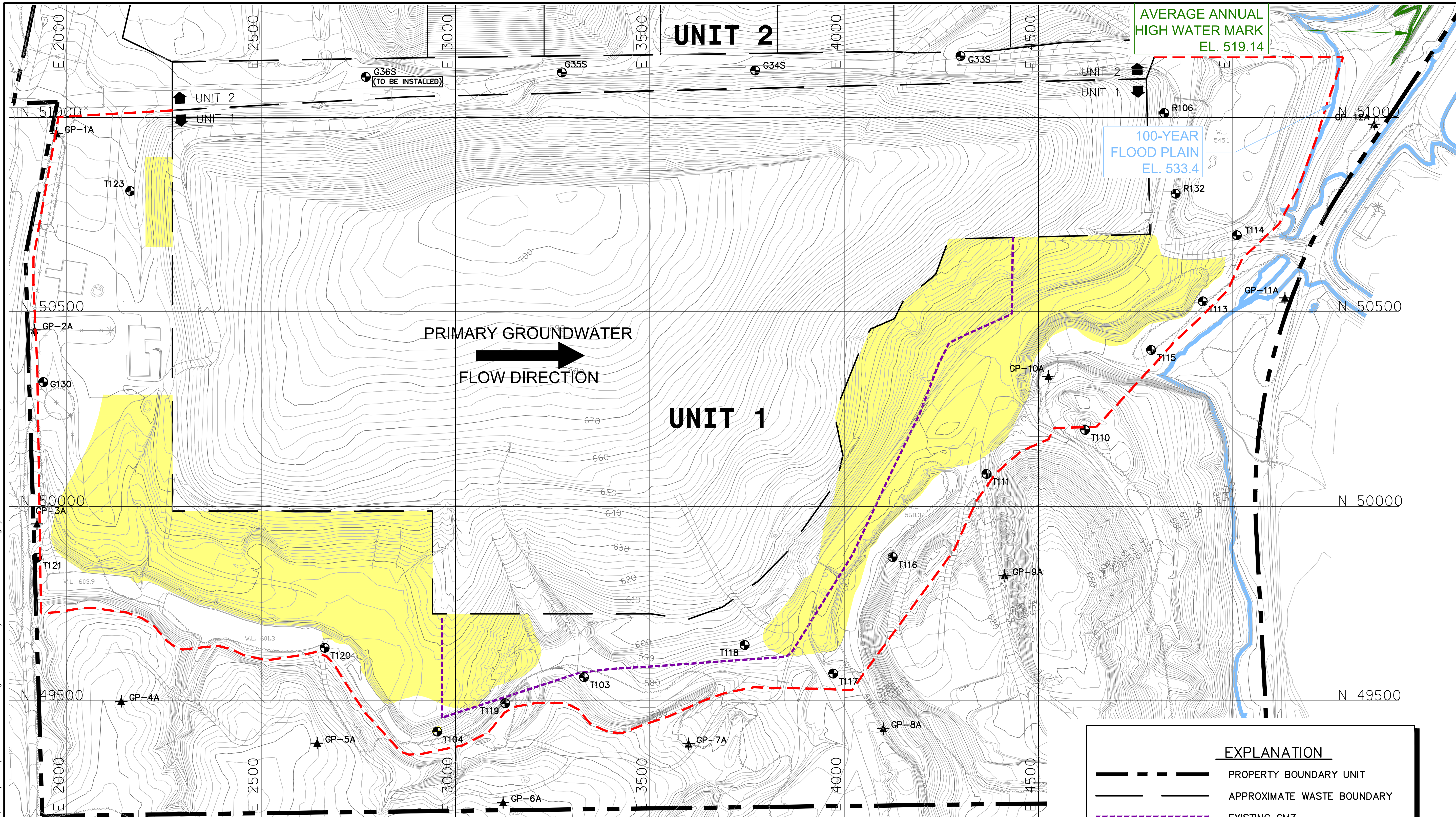
VERMILION COUNTY, IL AND INCORPORATED AREAS

FLOODWAY DATA

VERMILION RIVER – WEST BRANCH KOEHN CREEK

TABLE 8

EXHIBIT E



N

250 0 250 500

SCALE: IN FEET

NOTES:

1. THE PROPOSED COMPLIANCE BOUNDARY DOES NOT EXTEND BEYOND 150 METERS FROM THE UNIT 1 WASTE BOUNDARY.
2. CONTOURS WERE GENERATED FROM THE FLYOVER TAKEN ON FEBRUARY 17, 2013 BY COOPER AERIAL SURVEYS, CO. CONTOUR INTERVAL SHOWN IS 2 FEET.
3. FOR CLARITY, NOT ALL SITE FEATURES ARE SHOWN.
4. BACKGROUND WELLS INCLUDE G130, T121 AND T123.

EXPLANATION

- PROPERTY BOUNDARY UNIT
- APPROXIMATE WASTE BOUNDARY
- EXISTING GMZ
- PROPOSED COMPLIANCE BOUNDARY
- PERMITTED MONITORING WELL
- Txxx TEMPORARY WELL
- EXISTING GAS MONITORING PROBE
- AREA OF EXTRANEOUS MATERIALS

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APPROVED BY: JLR
DESIGNED BY: JLR
DRAWN BY: WCU

PROPOSED MONITOR WELL NETWORK

PLANS PREPARED FOR
BRICKYARD DISPOSAL & RECYCLING
DANVILLE, ILLINOIS

DATE: OCTOBER 2013
PROJECT ID: 89-115A
SHEET NUMBER: FIG. 3