west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0470
Fax: (304) 926-0488

Harold D. Ward, Cabinet Secretary
dep.wv.gov

CONSENT ORDER
ISSUED UNDER THE
WATER POLLUTION CONTROL AND GROUNDWATER PROTECTION ACTS
WEST VIRGINIA CODE CHAPTER 22, ARTICLES 11 AND 12

TO: Elkins Metal Recycling, LLC
Andrew Gongola, Owner
21 High Street
Elkins, WV 26241

DATE: May 6, 2026

ORDER NO.: 10235

INTRODUCTION

This Consent Order is issued by the Director of the Division of Water and Waste Management (hereinafter "Director"), under the authority of West Virginia Code 22-11-1 et seq. and 22-12-1 et seq. to Elkins Metal Recycling, LLC (hereinafter "EMR").

FINDINGS OF FACT

In support of this Order, the Director hereby finds the following:

1. EMR operates a Recycling Center located in Elkins, Randolph County, West Virginia. EMR was reissued WV/NPDES Water Pollution Control Permit No. WV0116955 on November 8, 2017 and March 23, 2022.

2. On September 17, 2012, West Virginia Department of Environmental Protection (WVDEP) and EMR entered into Order No. 7634. The Order was issued in response to EMR's violations of WV Legislative Rule and the WV/NPDES permit at the aforementioned facility. Among other provisions, the Order required that EMR submit a proposed Plan of Corrective Action (POCA). EMR's POCA was subsequently approved by WVDEP on January 14, 2013 and was incorporated into the terms/conditions of the Order.

3. On March 4, 2020, EMR installed a treatment channel including a new oil/water separator in the ditch/stream, as described in WV/NPDES Permit Modification No. 2, dated December 18, 2019.

4. On March 5, 2020, WVDEP personnel conducted a site visit and observed and documented a partially open trench with prefab concrete basins in place. Staining was noted on the trench walls. A sample taken by WVDEP personnel at the excavation trench reflected elevated concentrations of lead (438 mg/kg), TPH-DRO (4,307 mg/kg), and TPH-GRO (114 mg/kg). In consideration of these results, WVDEP requested that EMR submit a remediation plan for the contaminated area.

5. On March 1, 2022, WVDEP personnel conducted an inspection of the facility. During the inspection, violations of the following sections of the WV/NPDES permit were observed and documented:

    a. Section C.1 and Appendix A.II.1 – EMR failed to practice good housekeeping and failed to properly operate and maintain the facility. Solid waste was present around a railroad car on the east side of the property. There was equipment leaking fluids onto the ground on the south side of the railroad tracks. Fluid had been allowed to accumulate within the secondary containment for drums and tanks. Petroleum was present in water on the ground around the processing/receiving area.
    b. Section A.001 – EMR exceeded permitted discharge limits.

    As a result of the aforementioned violations, Notice of Violation (NOV) Nos. w22-42-028-mkk and w22-42-030-mkk were issued to EMR.

6. On July 12, 2022, WVDEP personnel conducted an inspection of the facility. During the inspection, violations of the following sections of West Virginia Legislative Rules and the WV/NPDES permit were observed and documented:

    a. Appendix A.III – EMR failed to adhere to proper procedures for monitoring and reporting by exceeding hold times for samples.
    b. Section C.1 and Appendix A.II.1 – EMR failed to practice good housekeeping and failed to properly operate and maintain the facility. In addition, contaminated fluid inside secondary containment had been allowed to accumulate.
    c. Section A.001 – EMR exceeded permitted discharge limits.
    d. 47CSR58 Section 4.7.d – EMR failed to ensure that drums containing corrosive materials that had the potential to contaminate groundwater were stored so that spills and leaks were contained. Specifically, drums in the water treatment area were not entirely within secondary containment.
    e. 47CSR58 Section 7.1 – EMR allowed petroleum products to flow onto or under the land surface in such a manner that could impact groundwater quality. Specifically, several petroleum stains were present under leaking salvage vehicles and pieces of equipment.

    As a result of the aforementioned violations, NOV Nos. w22-42-087-mkk, w22-42-088-mkk, w22-42-089-mkk, w22-42-090-mkk, and w22-42-091-mkk were issued to EMR.

7. On September 14, 2022, WVDEP personnel conducted a follow-up site visit at the facility. During the site visit, WVDEP personnel observed and documented petroleum staining under multiple pieces of equipment. Furthermore, contaminated fluids were still being allowed to accumulate within secondary containment.

8. On May 24, 2023, WVDEP personnel conducted an inspection of the facility. During the inspection, violations of the following sections of West Virginia Legislative Rules and the WV/NPDES permit were observed and documented:

    a. Section C.13.c – EMR failed to revise and implement the Stormwater Pollution Prevention Plan (SWPPP) in response to benchmark exceedances and submit a letter to the agency stating the revised and implemented stormwater pollution prevention practices.
    b. Section C.1 and Appendix A.II.1 – EMR failed to practice good housekeeping and failed to properly operate and maintain the facility by failing to remediate petroleum spills in several areas on the ground throughout the facility.
    c. Section A.001 – EMR exceeded permitted discharge limits.
    d. 47CSR58 Section 7.1 – EMR allowed petroleum products to flow onto or under the land surface in such a manner that could impact groundwater quality.

    As a result of the aforementioned violations, NOV Nos. w23-42-038-mkk, w23-42-040-mkk, and w23-42-041-mkk were issued to EMR.

9. On December 2, 2023, WVDEP personnel conducted a review of records from October 1, 2021 through September 30, 2023. During this review, the following violations of the terms and conditions of EMR's WV/NPDES permit were observed:

    a. Section A – Eight (8) exceedances of EMR's permit parameters were observed and documented (Table 1). These exceedances can be further defined as:
        i. Minor violations – Three (3)
        ii. Moderate violations – Three (3)
        iii. Major violations – Two (2)
    b. Section C.13 – EMR failed to revise and implement the SWPPP in response to benchmark exceedances which occurred during 1st quarter 2022, 2nd quarter 2022, and 1st quarter 2023 (Table 2) and submit a letter to the agency stating the revised and implemented stormwater pollution prevention practices.
    c. Appendix A.III – EMR failed to adhere to proper procedures for monitoring and reporting. Based upon a review of laboratory analyses, WVDEP personnel determined that, on several occasions, hold times were exceeded, samples were submitted without proper preservatives, and sample labels did not match chain of custody forms.

10. On February 27, 2024, WVDEP personnel and representatives of EMR met to discuss the terms and conditions of this Order.

11. On March 23, 2026, EMR submitted a plan of corrective action (POCA) that outlined action items and completion dates for how and when EMR would achieve compliance with all terms and conditions of the WV/NPDES permit and all permit laws and rules. The POCA was subsequently approved by WVDEP personnel.

ORDER FOR COMPLIANCE

Now, therefore, in accordance with West Virginia State Code 22-11-1 et seq. and 22-12-1 et seq., it is hereby agreed between the parties, and ORDERED by the Director:

1. EMR shall immediately take all measures to initiate compliance with all terms and conditions of its WV/NPDES permit and pertinent laws and rules.

2. Upon the effective date of this Order, EMR shall begin complying with the aforementioned approved POCA and schedule, dated March 23, 2026. The POCA and schedule have been incorporated into and become part of this Order. Failure to adhere to the approved POCA and schedule is a violation of this Order.

3. Because of EMR's violations, EMR shall be assessed a civil administrative penalty of twenty-four thousand four hundred thirty dollars ($24,430) to be paid to the West Virginia Department of Environmental Protection for deposit in the Water Quality Management Fund in accordance with the following schedule: Two thousand thirty-five dollars and eighty-three cents ($2,035.83) shall be submitted within thirty (30) days after the effective date of this Order and by the first day of each month thereafter for the next ten (10) months. Two thousand thirty-five dollars and eighty-seven cents ($2,035.87) shall be submitted by the first day of the final month. Payments made pursuant to this paragraph are not tax-deductible for purposes of State or federal law. **Payment shall include a reference to the Order No. and shall be mailed to:**

Chief Inspector
Environmental Enforcement - Mail Code #031328
WVDEP
601 57th Street SE
Charleston, WV 25304

OTHER PROVISIONS

1. EMR hereby waives its right to appeal this Order under the provisions of West Virginia State Code 22-11-21 and 22-12-11. Under this Order, EMR agrees to take all actions required by the terms and conditions of this Order and consents to and will not contest the Director's jurisdiction regarding this Order. However, EMR does not admit to any factual and legal determinations made by the Director and reserves all rights and defenses available regarding liability or responsibility in any proceedings regarding EMR other than proceedings, administrative or civil, to enforce this Order.

2. The Director reserves the right to take further action if compliance with the terms and conditions of this Order does not adequately address the violations noted herein and reserves all rights and defenses which he may have pursuant to any legal authority, as well as the right to raise, as a basis for supporting such legal authority or defenses, facts other than those contained in the Findings of Fact.

3. If any event occurs which causes delay in the achievement of the requirements of this Order, EMR shall have the burden of proving that the delay was caused by circumstances beyond its reasonable control which could not have been overcome by due diligence (i.e., force majeure). Force majeure shall not include delays caused or contributed to by the lack of sufficient funding. Within three (3) working days after EMR becomes aware of such a delay, notification shall be provided to the Director/Chief Inspector and EMR shall, within ten (10) working days of initial notification, submit a detailed written explanation of the anticipated length and cause of the delay, the measures taken and/or to be taken to prevent or minimize the delay, and a timetable by which EMR intends to implement these measures. If the Director agrees that the delay has been or will be caused by circumstances beyond the reasonable control of EMR (i.e., force majeure), the time for performance hereunder shall be extended for a period of time equal to the delay resulting from such circumstances. A force majeure amendment granted by the Director shall be considered a binding extension of this Order and of the requirements herein. The determination of the Director shall be final and not subject to appeal.

4. Compliance with the terms and conditions of this Order shall not in any way be construed as relieving EMR of the obligation to comply with any applicable law, permit, other order, or any other requirement otherwise applicable. Violations of the terms and conditions of this Order may subject EMR to additional penalties and injunctive relief in accordance with the applicable law.

5. The provisions of this Order are severable and should a court or board of competent jurisdiction declare any provisions to be invalid or unenforceable, all other provisions shall remain in full force and effect.

6. This Order is binding on EMR, its successors and assigns.

7. This Order shall terminate upon EMR's notification of full compliance with the "Order for Compliance" and verification of this notification by WVDEP.

Andrew Gongola, Owner
Elkins Metal Recycling, LLC

5-11-26
Date

Public Notice begin:

Date

Public Notice end:

Date

Jeremy W. Bandy, Director
Division of Water and Waste Management

Date

Table Two: Benchmark Exceedance Summary

Responsible Party: Elkins Metal Recycling, LLC

Date Range:	Oct-21		To:	Sep-23

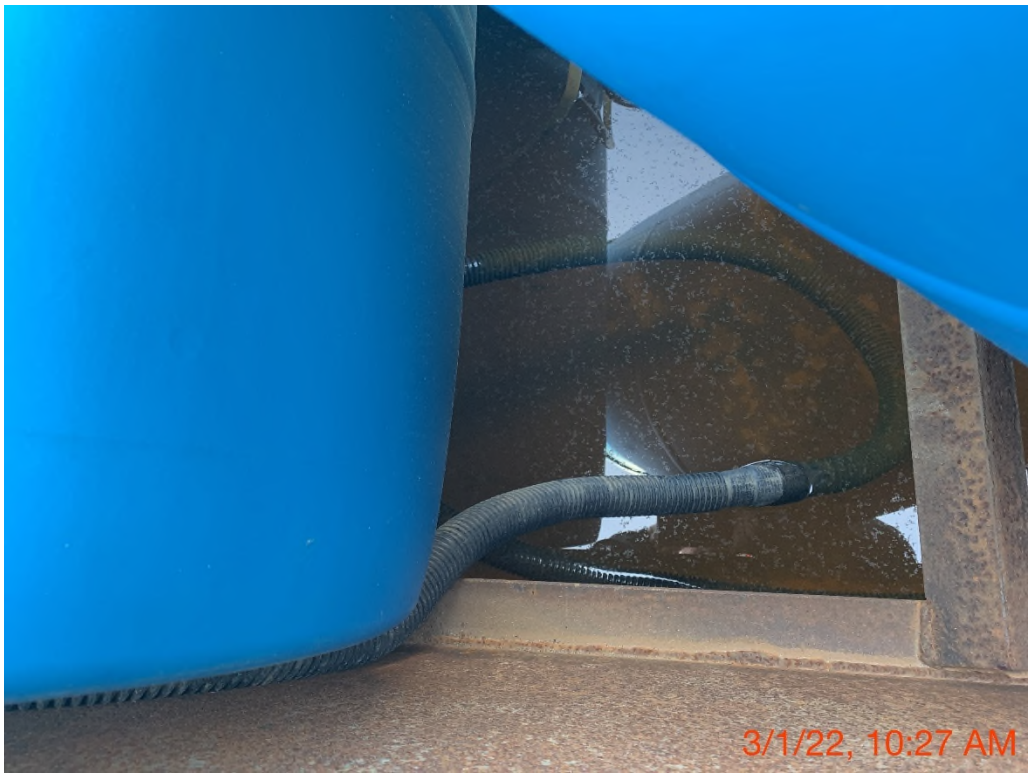
Outlet	Date	Parameter	Units	Benchmark Cut-off Value	Reported Result
001	Dec-21	**Chemical Oxygen Demanc**	mg/L	120	**189**
001	Mar-22	**Chemical Oxygen Demanc**	mg/L	120	**210**
001	Jun-22	**Chemical Oxygen Demanc**	mg/L	120	**126**
001	Mar-23	**Chemical Oxygen Demanc**	mg/L	120	**212**

Total = 4

Table One: Elkins Metal Recycling, LLC DMR Exceedance Summary

Outlet 001 DMR Exceedances - MAX. DAILY - October 2021 through September 2023						Degree of non-compliance		
Date	Parameter	Units	Permitted max. daily	Reported max. daily	% Exceedance	Min	Mod	Maj
12/21	**Copper, Total Recoverable**	mg/l	0.0093	**0.021**	126%	-	X	-
12/21	**Lead, Total Recoverable**	mg/l	0.0032	**0.018**	463%	-	X	-
3/22	**Copper, Total Recoverable**	mg/l	0.0093	**0.066**	610%	-	-	X
3/22	**Lead, Total Recoverable**	mg/l	0.0032	**0.072**	2150%	-	-	X
3/22	**Zinc, Total Recoverable**	mg/l	0.12	**0.23**	92%	X	-	-
3/22	**Aluminum, Total Recoverable**	mg/l	0.75	**1.4**	87%	X	-	-
3/22	**Iron, Total Recoverable**	mg/l	1.5	**3.4**	127%	-	X	-
12/22	**Copper, Total Recoverable**	mg/l	0.0187	**0.022**	18%	X	-	-
					Total	**3**	**3**	**2**

Elkins Metal Recycling, LLC - PHOTO LOG



Accumulated contaminated water in secondary containment

Inadequate secondary containment for Drums of PremierFloc 4240

Elkins Metal Recycling, LLC - PHOTO LOG

Solid waste in the rear of the property at the “wetland.”

No berm installed in this area

Elkins Metal Recycling, LLC - PHOTO LOG

No berm as outlined within the SWPPP/GPP

Fuel staining on the ground below the tank

Elkins Metal Recycling, LLC - PHOTO LOG

Excavator leaking onto the ground

Equipment leaking onto ground

Elkins Metal Recycling, LLC - PHOTO LOG

Secondary containment with petroleum contaminated water

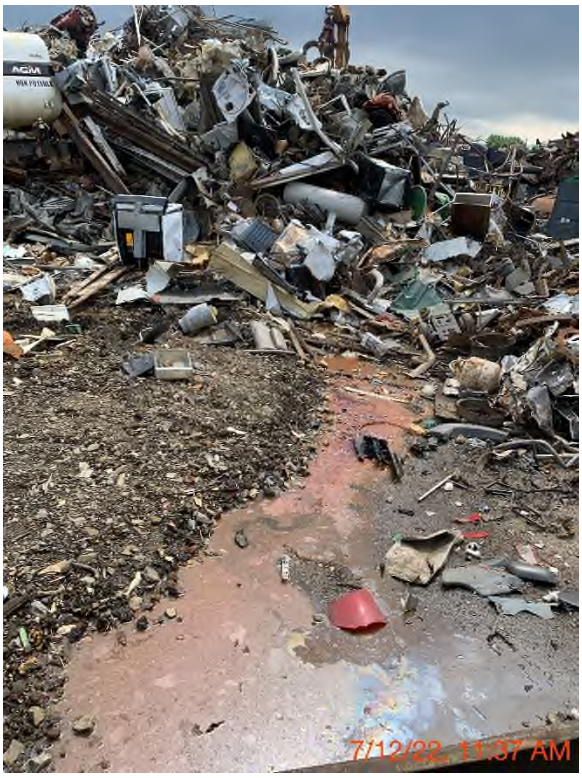
Petroleum staining in a puddle of water in scrap yard

Elkins Metal Recycling, LLC - PHOTO LOG

Solid waste along the rail car on the east side of the property.

7/12/2022 Improper secondary containment for drums and hoses.

Elkins Metal Recycling, LLC - PHOTO LOG



7/12/2022 There was iron and petroleum leaching from the scrap pile towards the ditch.

7/12/2022 Petroleum was leaking from a salvage truck onto the ground near the ditch.

Elkins Metal Recycling, LLC - PHOTO LOG

7/12/2022 Petroleum was leaking from a salvage vehicle.

7/12/2022 Petroleum was leaking from equipment.

Elkins Metal Recycling, LLC - PHOTO LOG

7/12/2022 Petroleum (used gas) contaminated fluid had accumulated within secondary containment.

7/12/2022 There was petroleum staining on the ground.

Elkins Metal Recycling, LLC - PHOTO LOG

7/12/2022 There was petroleum leaking from equipment.

7/12/2022 Staining around hopper trailers.

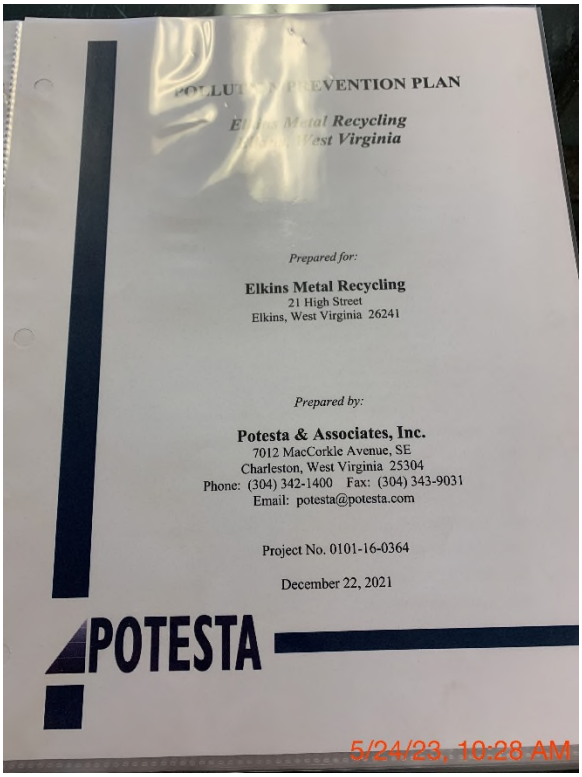
Elkins Metal Recycling, LLC - PHOTO LOG

7/12/2022 Staining near the metal cutting area.

9/14/2022 Petroleum (used gas) contaminated fluids had accumulated within secondary containment.

Elkins Metal Recycling, LLC - PHOTO LOG

9/14/2022 There was petroleum staining on the ground.



5/24/2023 This was the current SWPPP/GPP cover, dated December 22, 2021.

Elkins Metal Recycling, LLC - PHOTO LOG

5/24/2023 There was heavy equipment filling in the “wetland” area.

5/24/2023 There was petroleum staining on the ground around the scrap metal dumpster.

Elkins Metal Recycling, LLC - PHOTO LOG

5/24/2023 There was petroleum staining on the ground.

5/24/2023 There was staining on the ground around secondary containment.

Elkins Metal Recycling, LLC - PHOTO LOG

5/24/2023 There was staining on ground from equipment.

5/24/2023 There was staining on the ground under a crane.

Elkins Metal Recycling, LLC - PHOTO LOG

5/24/2023 There was staining on the ground from equipment.

5/24/2023 There was staining on ground from equipment.

ELKINS METAL RECYCLING

1401 15TH Street Ext. Phone: 304-636-3456
Elkins, WV 26241 Fax: 304-636-3491
www.ElkinsMetalRecycling.com

March 23, 2026

Mr. Brad Wright
Chief Inspector – Environmental Enforcement
West Virginia Department of Environmental Protection
601 57th Street, SE
Charleston, West Virginia 25304

RE: Draft Consent Order Number 10235
Plan of Corrective Action
EMR Metal Recycling, LLC

Dear Mr. Wright:

Elkins Metal Recycling (EMR) in Elkins, West Virginia, (National Pollutant Discharge Elimination System [NPDES] Permit No. WV0116955) received Draft Consent Order Number 10235 (Order), issued by the West Virginia Department of Environmental Protection (WVDEP), Division of Environmental Enforcement, on May 1, 2025. The Order required a Plan of Corrective Action (POCA) to outline action items and completion dates for how and when EMR will achieve compliance with the terms and conditions of the NPDES permit, pertinent laws and rules. EMR submitted an initial POCA to the WVDEP on May 23, 2025. Correspondence was issued by the WVDEP on November 19, 2025 stating that the submitted POCA was not sufficient. Pursuant to our discussions on December 1, 2025 and subsequent electronic mail correspondence, EMR is providing this revised POCA for inclusion to the Final Order.

EMR has reviewed items listed within the Order and noted that many items were corrected immediately following the initial WVDEP site visit or upon receipt of the related Notice of Violation (NOV). A summary of the Inspector comments/photos and actions taken to achieve compliance are included in the attached table. Further, EMR is providing the WVDEP with a commitment that a letter outlining revised and implemented storm water prevention practices will be provided to the WVDEP IF future required outlet monitoring shows the concentration of a pollutant exceeds the corresponding benchmark concentration or shows a pH value that is not within the acceptable range.

EMR contends that the individual spills/releases referenced in the Order have been addressed as outlined in the attached table, with the exception of the suspected petroleum contamination in soil under/around the treatment channel, for which sampling is proposed herein. Additionally,

per discussions with WVDEP representatives, EMR agrees to perform sampling in the basin area of the former wetland adjacent to the current treatment channel, as well as within an area to verify successful clean-up of petroleum contaminated soil in an area that was noted to have previous releases. The maintenance area to the south of the railroad tracks was cited multiple times for leaking equipment and has been determined appropriate for sampling to represent previously remediated areas. This is the portion of the site where equipment that may contain petroleum products (e.g., fuel, oils, automotive fluids, etc.) are staged prior to processing. EMR believes that evaluation of these areas will satisfy the requirement for "*delineating all petroleum-contaminated soil at the facility . . . .*"

EMR provided a general sampling plan for soil sampling in the area of the treatment channel in a letter dated May 7, 2020. Since that time, analytical parameters used for Division of Water and Waste cleanups have been modified from total petroleum hydrocarbon (TPH) to those specified by the Corrective Action Guidance Document for Leaking Aboveground Storage Tanks and Underground Storage Tanks (CAGD). Based on the reported concentrations of TPH-DRO and TPH-ORO in the samples collected by WVDEP personnel on March 5, 2020, EMR proposes to submit samples for analysis for the analytical parameters specified in CAGD *Table 2. Diesel, Kerosene, and Refined Oils Analytical Parameters*.

To further define the sampling methodology for the three areas, EMR proposes to use a direct-push sampling unit to advance soil borings to 4 feet below ground surface (bgs) at or near the locations presented on Figure 1 (attached). Soil samples collected during the sampling activities will be visually classified and logged by an experienced staff scientist/technician following the Unified Soil Classification System, observed, and screened using a PID for evidence of impact from petroleum contamination. Up to two soil samples per soil boring will be selected for analysis based on location, depth, and field observations. If evidence of impact from petroleum contamination is observed in the first four feet bgs, the soil boring(s) will be advanced another four feet bgs. This process will continue until evidence of impact is not observed, groundwater is encountered, or refusal. If groundwater is encountered, that soil boring will be converted to a temporary groundwater sampling point and a grab sample of groundwater will be collected if sufficient quantity can be obtained. Groundwater samples will also be analyzed for CAGD *Table 2* parameters.

As requested, EMR will notify WVDEP regional staff (i.e., Environmental Enforcement Romney office) of the scheduled sampling one week prior to initiation of the soil sampling activities.

The analytical results for the groundwater samples will be compared to CAGD *Groundwater Standards/Action Levels (Table 4), and the analytical results for the soil samples will be compared to CAGD Tier 1 and/or Tier 2 Soil Action Levels as appropriate for their respective location and depth*. The results of the initial round of sampling and analysis as discussed within this POCA will be reported to the WVDEP as presented in the table below. If contaminants are identified exceeding these standards/action levels, EMR will submit an addendum to the POCA outlining the path forward to address the contamination. The addendum to the POCA will

include information related to the presence or absence of shallow groundwater tables at the site and the potential for contamination based on soil boring observations and sampling results.

The following presents a summary of actions that will be completed to comply with Order No. 10235:

Description of Action	Timeline for Completion*
Collect soil and groundwater (if encountered) samples as discussed within this POCA at the six (6) identified boring locations.	Within 60 days (Notify WVDEP Romney 7 days prior to sampling)
Provide results of the initial round of sampling and analysis (as discussed within this POCA) to the WVDEP	Within 120 days
If contaminants are identified as exceeding the specified standards/action levels within the initial samples, submit a POCA addendum to the WVDEP outlining the path forward to address contamination.	Within 210 days
Request access onto adjacent property, owned by the railroad, to capture the offsite solid waste located to the north and east side of the site.	Within 30 days
If property owner approval is granted, retrieve previously identified solid waste and appropriately recycle or dispose.	Within 180 days

**Timeline for Completion is based off of effective date of the final Order*

A timeline for removal of "solid waste" from the site berm has NOT been included in the POCA. The debris and solid waste referenced in the Order consists of small pieces of plastics that have become entrained within the site dirt over the years of operations. As discussed during our meeting on May 16, 2025, the berm and entrained debris are not considered solid waste as this material is serving a purpose. Although no longer required to control site drainage, the berm is maintained in certain places around the recycling yard to identify the site boundary and prevent placement of material or equipment beyond the berm. At the request of WVDEP Environmental Enforcement (EE), grab samples from the berm soil/material were obtained and analyzed using TCLP for arsenic, barium, cadmium, chromium, lead, selenium, silver, mercury and benzene (laboratory data attached). The levels reported from the TCLP analyses were observed to be below the Maximum Concentration of Contaminants for the Toxicity Characteristic, as included in Title 40 of the Code of Federal Regulations, Chapter 1, Subchapter 1, Part 261 Subpart C. Therefore, pursuant to correspondence with WVDEP EE, it has been determined acceptable to leave the berm with entrained material in place.

If you have any questions or require more information regarding these matters, please do not hesitate to contact me at (304) 692-6900, Dave Corsaro or Christina Moore of Potesta & Associates, Inc. at (304) 342-1400.

Sincerely,

Elkins Metal Recycling

Barry Bledsoe
Chief Operations Officer

BB:CCM:DC/rlh

Attachments

c: Ms. Christina Moore, Potesta & Associates, Inc.

SCALE: 1" = 75' | DATE: 03/16/2026 | PN: 13-0493.000
DRAWN: CH | CHECKED: | APPROVED:

POTESTA

Potesta & Associates, Inc.
ENGINEERS AND ENVIRONMENTAL CONSULTANTS
7012 MacCorkle Avenue, S.E.
Charleston, WV 25304
Office: (304) 342-1400 Fax: (304) 343-9031
E-mail: potesta@potesta.com

ELKINS METAL RECYCLING
21 High Street
Elkins, West Virginia 26241

MAPPING FOR VISUAL REPRESENTATION ONLY
Elkins Metals Recycling
Proposed Soil Boring Locations
Elkins Quadrangle
Randolph County, West Virginia
For Informational Purposes Only

FIGURE 1

Original Inspection Date	Order 10235 Item No.	NOV Number	Documented Violation	Permittee Action
5-Mar-20	4	--	Staining noted on trench walls in area where concrete basin had not yet been installed. DEP requested EMR submit a remediation plan of the contaminated area.	EMR provided a plan for soil samples via NOV response letter on May 7, 2020. Mr. Kanehl wanted additional samples and stated we would discuss further after he visited the site again. EMR submitted letter that we were awaiting further direction from WVDEP prior to collecting soil samples.
1-Mar-22	5a	w-22-42-030-mkk	Miscellaneous debris and spillage were observed within the berm.	–
			Solid waste within the water to the north and east side along the berm.	–
			Solid waste around a railroad car.	As discussed in the April 18, 2022 NOV response letter, paper materials around the railroad care were collected and dispensed immediately following the WVDEP visit.
			Equipment leaking fluids onto the ground on the south side of the railroad tracks.	As discussed in the April 18, 2022 NOV response letter, a small leak from the site excavator was noted within the inspection report. The leak was estimated to total approximately 10 ml and present only on the surface of the gravel. Gravel was cleaned up immediately following WVDEP's site visit.
			Photo of equipment leaking	Roller that was purchased for scrap. Received the day before inspection and started leaking after parked. After identification, leakage captured. Minimal petroleum leakage on ground surface. Dirt/gravel was removed following inspection and disposed of appropriately.
			Photo of equipment leaking	The staining on the ground below the Woodford Oil fuel tank (as shown in photo of Order) is located on concrete. Petroleum was cleaned up and disposed, but staining remains on the concrete and cannot be removed. EMR constructed a nozzle holder to place the nozzle in after fueling to prevent future leaks.
			Fluid allowed to accumulate within secondary containment.	–
			Petroleum present in water on the ground around the processing receiving area.	As stated in the April 18, 2022 NOV response letter, EMR cleaned up the petroleum noted on the puddle with an oil absorbent pad immediately following WVDEP's site visit.
1-Mar-22	5b	w-22-42-028-mkk	Violated discharge limitations for copper, lead, zinc and iron March 2019 through December 2021.	As discussed in the NOV response letter provided to the WVDEP on April 18, 2022, EMR installed the treatment channel in 2020 and began adjusting flocculant addition and treatment practices to reduce concentrations. In 2021, EMR collected and submitted background river data to obtain a default mixing zone during storm conditions. The permit was reissued March 2022 and limitations were increased based on the default mixing zone. EMR has been compliant with discharge limitations since March 2022 (with the exception of a minor exceedance of copper in December 2022.)
			Exceeded hold times for pH during 2020 and 2021.	As discussed in the NOV response letter provided to the WVDEP on April 18, 2022, the reported pH values did not exceed hold times. The DEP inspector assumed the hold times were exceeded since EMR included pH on the lab requested analysis. However, EMR also completes field pH measurements and reported those field measurements on the DMRs.

Original Inspection Date	Order 10235 Item No.	NOV Number	Documented Violation	Permittee Action
12-Jul-22	6c	w22-42-087-mkk	Exceeded discharge limits for copper, lead, zinc, iron and aluminum from March 2020 through March 2022	Limit exceedances for 2020 and 2021 were discussed under NOV w22-42-028-mkk. As discussed in the April 18, 2022 and August 24, 2022 NOV response letters, the permit was reissued March 2022 and limitations were increased based on the default mixing zone. The exceedances noted for March 2022 would have been compliant if the revised permit limitations were in effect. EMR has been compliant with discharge limitations since March 2022 (with the exception of a minor exceedance of copper in December 2022.)
	6b	w22-42-088-mkk	Debris (solid waste, spills, scrap metal) observed in the berm	–
			Solid waste in the water on the north and east side along the berm	–
			Contaminated fluid inside secondary containment allowed to accumulate	Fluid within secondary containment was appropriately removed.
	6a	w22-42-089-mkk	Exceeded hold times for pH and TSS during 2020, 2021 and 2022	As discussed in the April 18, 2022 NOV response letter, the reported pH values did not exceed hold times. The TSS hold time exceedance occurred during the 2nd quarter 2022 due to lab error. The lab did not make EMR aware of the exceedance in time to collect an additional sample.
	6d	w22-42-090-mkk	Drums within the water treatment area were not entirely within secondary containment	The top of the flocculant drum(s) extended approximately 2 inches past the edge of containment. As discussed in the August 24, 2022 NOV response letter, EMR modified the containment structure to completely contain the treatment drums.
	6e	w22-42-091-mkk	Several petroleum stains were present under leaking salvage vehicles and pieces of equipment. Areas noted in the inspection report and associated photos are as follows:	
			- Several salvage vehicles in the processing area (2)	As stated in the August 24, 2022 NOV response letter, the leaks were addressed, petroleum cleaned up and impacted soil (surface impact only) was removed.
			- leaking from equipment (photo time 11:18)	Purchased scrap motors from drilling company on day before inspection. Started leaking. Cleaned up immediately following inspection, disposed of soils/gravel
			- leaking from equipment	Site grapple developed hydraulic leak. Fixed the hydraulic leak, removed stained gravel and soil and appropriately disposed.
			- leaching from scrap pile	As stated in the August 24, 2022 NOV response letter, EMR sorted the scrap pile and removed the shredder material was identified to contain the leaching material(s). The source of iron and petroleum was not identified during the removal of the material. However, the entire pile was removed thus also removing the source. Dirt potentially impacted by the petroleum leaching was also removed and properly disposed.
			- Ground surface staining near the cutting area	As stated in the August 24, 2022 NOV response letter, this area did not have petroleum staining. The soil coloration observed by the WVDEP was the result of slag from cutting operations.
			- staining around hopper trailers	Photo is of a scrap trailer from drilling industry that was used to transport sand. No known oils within this trailer as it was air/electric operated. This area was not mentioned during the DEP site visit. EMR inspected the area after receiving the report with photo, but did not find evidence of a petroleum leak/spill.
			- Petroleum staining on concrete	As stated in the August 24, 2022 NOV response letter, the leaks were addressed, petroleum staining on concrete is a result of a leak that has been cleaned. The concrete staining has no potential to contaminate storm water runoff or contaminate the groundwater.

Original Inspection Date	Order 10235 Item No.	NOV Number	Documented Violation	Permittee Action
9/14/2022	7	--	Berm around scrap yard contained misc. solid waste	EMR asserts that the solid waste noted within the berm contains small pieces of plastic that have become entrained within the facility soils. The plastics do not result in environmental harm. EMR proposes to maintain this dirt onsite.
		--	Solid waste still present in water on the north and east side along the berm	The items present within the water on the north/east side of the berm are not located on EMR property and were not placed by EMR operations. Access to these items is dangerous. EMR does not intend to gather these items.
		--	Petroleum staining under multiple pieces of equipment	Photographs within inspection report notes one piece of equipment with petroleum staining. This is the scrap trailer from drilling industry used to move sand discussed previously. The trailer was scrapped shortly following the inspection and area inspected to ensure petroleum staining not present
		--	Contaminated fluids were still being allowed to accumulate in secondary containment	Fluids were removed and roofs or covers were placed on the secondary containment to minimize rainwater intrusion
5/24/2023	8c	w23-42-038-mkk	Violated discharge limitations for copper in December 2022	EMR adjusted the treatment process and reduced the copper below limitations in subsequent quarters.
	8a	w23-42-040-mkk	Failed to revise and implement the SWPPP to lower benchmark exceedances (Order 10235 includes failure to submit a letter of revisions to WVDEP, but the NOV did not include this comment.)	As stated in the July 12, 2023 NOV response letter, EMR notes changes in response to benchmark or limitation exceedances in the water treatment system maintenance log. This log is included as an appendix within the SWPPP and updated frequently on the electronic file at the facility.
	8b, 8d	w23-42-041-mkk	Failed to remediate a petroleum spill around the oil/water separator and other areas that could contaminate the groundwater quality	EMR submitted response on May 11, 2020 which included sampling to determine if contamination was present at the oil water separator. EMR was instructed to wait on WVDEP direction before collecting samples.
			- Order includes photos of several areas in addition to the oil water separator:	
			- petroleum staining on the ground around the scrap metal dumpster	As stated in the July 12, 2023 NOV response letter, petroleum staining around scrap metal dumpster (Inspection Report Photo Time 10:42) – This was surface staining and has been cleaned up with contaminated soils properly disposed.
			- petroleum staining on the ground	As stated in the July 12, 2022 NOV response letter, petroleum staining on ground (Inspection Report Photo Time 10:44) has been thoroughly inspected to identify stained soils. Stained soils have been removed and properly disposed.
			- staining on the ground around secondary containment	Staining on ground around secondary containment (Inspection Report Photo Time 10:45) - The majority of area that appears as staining within the photo is a shadow. However, some staining was present and was cleaned up.
			- staining on the ground from equipment	As stated in the July 12, 2022 NOV response letter, the staining noted in inspection report photo time 10:50) is petroleum staining on ground from recycled material. The material was removed, the area cleaned and stained soil/gravel appropriately disposed.
			- staining on the ground under a crane	Staining on ground under a crane (Inspection Report Photo time 10:53) – The staining has been cleaned up and a pan has been placed under the crane to capture potential leakage. The equipment is being evaluated to determine if repairs are necessary. The site will be inspected daily to ensure future staining of site soil is minimized.
			- staining on the ground from equipment	Staining on ground from equipment (Inspection Report Photo times 10:54 and 11:01) – As discussed in the July 12, 2023 NOV response letter, the staining has been cleaned up and a pan was placed under the equipment to capture potential leakage until the equipment could be evaluated for repair. Subsequently, the equipment was repaired and the ground surface was inspected to note additional leaks had not occurred.

Original Inspection Date	Order 10235 Item No.	NOV Number	Documented Violation	Permittee Action
12/2/2023	9a	Records Review inserted into Order 10235	12/2021 Cu & Pb moderate exceedance; 3/2022 Cu & Pb major exceedance, Zn & Al minor exceedance, Fe moderate exceedance; 12/2022 Cu minor exceedance	As discussed in previous NOV response letters, the exceedances were addressed by changes in the treatment channel. The facility is currently in compliance with permit limitations and benchmarks.
	9b		Failed to revise and implement the SWPPP in response to benchmark exceedances 1q22, 2q22, 1q23 and submit a letter to the agency stating the revised and implemented practices	As discussed in previous NOV response letters, revisions to the SWPPP were made by updates to the treatment channel log which is included as an appendix to the SWPPP.
	9c		Hold time exceedances on several occasions samples submitted without proper preservatives, sample labels did not match chain of custody forms	As discussed in previous NOV response letters, EMR is only aware of one TSS hold time exceedance that was the result of laboratory error.

Elkins Metal Recycling
Site Berm TCLP Analysis Results

Parameter	Regulatory Level	Location 1	Location 2	Location 3
Arsenic (mg/l)	5	<0.1	<0.1	<0.1
Barium (mg/l)	100	2	2.4	1.9
Cadmium (mg/l)	1	0.039	0.056	0.024
Chromium (mg/l)	5	<0.025	<0.025	<0.025
Lead (mg/l)	5	<0.050	0.14	<0.050
Selenium (mg/l)	1	<0.10	<0.10	<0.10
Silver (mg/l)	5	<0.025	<0.025	<0.025
Mercury (mg/l)	0.2	<0.00040	<0.00040	<0.00040
Benzene (mg/l)	0.5	<0.05	<0.05	<0.05

Regulatory level obtained from Title 40 of the Code of Federal Regulations, Chapter 1, Subchapter 1, Part 261 Subpart C - Maximum Concentration of Contaminants for the Toxicity Characteristic

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

January 20, 2026

Ms. Mindi Reams
Elkins Metal Recycling
21 High St.
Elkins, WV 26241

RE: Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

Dear Ms. Reams:

Enclosed are the analytical results for sample(s) received by the laboratory on January 07, 2026. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Beaver
- Pace Analytical Services - Greensburg

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Beth Johnson
beth.johnson@pacelabs.com
(800)999-0105
Project Manager

Enclosures

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

CERTIFICATIONS

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

Pace Analytical Services Pennsylvania

1638 Roseytown Rd Suites 2,3&4, Greensburg, PA 15601
ANAB DOD-ELAP Rad Accreditation #: L2417
ANABISO/IEC 17025:2017 Rad Cert#: L24170
Alabama Certification #: 41590
Arizona Certification #: AZ0734
Arkansas Certification
California Certification #: 2950
Colorado Certification #: PA01547
Connecticut Certification #: PH-0694
EPA Region 4 DW Rad
Florida/TNI Certification #: E87683
Georgia Certification #: C040
Guam Certification
Hawaii Certification
Idaho Certification
Illinois Certification
Indiana Certification
Iowa Certification #: 391
Kansas Certification #: E-10358
Kentucky Certification #: KY90133
KY WW Permit #: KY0098221
KY WW Permit #: KY0000221
Louisiana DHH/TNI Certification #: LA010
Louisiana DEQ/TNI Certification #: 04086
Maine Certification #: 2023021
Maryland Certification #: 308
Massachusetts Certification #: M-PA1457
Michigan/PADEP Certification #: 9991
Missouri Certification #: 235
Montana Certification #: Cert0082
Nebraska Certification #: NE-OS-29-14
Nevada Certification #: PA014572023-03
New Hampshire/TNI Certification #: 297622
New Jersey/TNI Certification #: PA051
New Mexico Certification #: PA01457
New York/TNI Certification #: 10888
North Carolina Certification #: 42706
North Dakota Certification #: R-190
Ohio EPA Rad Approval: #41249
Oregon/TNI Certification #: PA200002-015
Pennsylvania/TNI Certification #: 65-00282
Puerto Rico Certification #: PA01457
Rhode Island Certification #: 65-00282
South Dakota Certification
Tennessee Certification #: TN02867
Texas/TNI Certification #: T104704188-22-18
Utah/TNI Certification #: PA014572223-14
USDA Soil Permit #: 525-23-67-77263
Vermont Dept. of Health: ID# VT-0282
Virgin Island/PADEP Certification
Virginia/VELAP Certification #: 460198
Washington Certification #: C868
West Virginia DEP Certification #: 143
West Virginia DHHR Certification #: 9964C
Wisconsin Approve List for Rad

Pace Analytical Services Beaver

225 Industrial Park Road, Beaver, WV 25813
New York DOH Lab ID12167 SN69208
Virginia VELAP 460148
West Virginia DEP 060
West Virginia DHHR 00412CM
North Carolina DEQ 466
Kentucky Wastewater Certification KY90039
Pennsylvania DEP 68-00839

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

SAMPLE SUMMARY

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

Lab ID	Sample ID	Matrix	Date Collected	Date Received
30838012001	**LOCATION - 1**	Solid	01/06/26 14:32	01/07/26 20:00
30838012002	**LOCATION - 2**	Solid	01/06/26 14:47	01/07/26 20:00
30838012003	**LOCATION - 3**	Solid	01/06/26 14:50	01/07/26 20:00

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(800)999-0105

SAMPLE ANALYTE COUNT

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

Lab ID	Sample ID	Method	Analysts	Analytes Reported
30838012001	**LOCATION - 1**	EPA 6010D	AGB	7
		EPA 7470A	JLH1	1
		EPA 8260C	EG	5
30838012002	**LOCATION - 2**	EPA 6010D	AGB	7
		EPA 7470A	SLT	1
		EPA 8260C	EG	5
30838012003	**LOCATION - 3**	EPA 6010D	AGB	7
		EPA 7470A	SLT	1
		EPA 8260C	EG	5

PASI-BV = Pace Analytical Services - Beaver
PASI-PA = Pace Analytical Services - Greensburg

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

PROJECT NARRATIVE

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

Method: **EPA 6010D**
Description: BVR 6010D MET ICP, TCLP, 3010A
Client: ELKINS METAL RECYCLING
Date: January 20, 2026

General Information:
3 samples were analyzed for EPA 6010D by Pace Analytical Services Beaver. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:
The samples were prepared in accordance with EPA 3010A with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

PROJECT NARRATIVE

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

Method: **EPA 7470A**
Description: BVR 7470 Mercury, TCLP
Client: ELKINS METAL RECYCLING
Date: January 20, 2026

General Information:
3 samples were analyzed for EPA 7470A by Pace Analytical Services Beaver. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:
The samples were prepared in accordance with EPA 7470A with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

PROJECT NARRATIVE

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

Method: **EPA 8260C**
Description: 8260C MSV TCLP
Client: ELKINS METAL RECYCLING
Date: January 20, 2026

General Information:
3 samples were analyzed for EPA 8260C by Pace Analytical Services Greensburg. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

ANALYTICAL RESULTS

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

Sample: LOCATION - 1 **Lab ID: 30838012001** Collected: 01/06/26 14:32 Received: 01/07/26 20:00 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 6010D MET ICP, TCLP, 3010A	Analytical Method: EPA 6010D Preparation Method: EPA 3010A Leachate Method/Date: EPA 1311; 01/12/26 11:45 Initial pH: 8.62; Final pH: 5.65 Pace Analytical Services - Beaver							
Arsenic	ND	mg/L	0.10	1	01/13/26 08:23	01/13/26 19:53	7440-38-2	
Barium	**2.0**	mg/L	0.025	1	01/13/26 08:23	01/13/26 19:53	7440-39-3	
Cadmium	**0.039**	mg/L	0.010	1	01/13/26 08:23	01/13/26 19:53	7440-43-9	
Chromium	ND	mg/L	0.025	1	01/13/26 08:23	01/13/26 19:53	7440-47-3	
Lead	ND	mg/L	0.050	1	01/13/26 08:23	01/13/26 19:53	7439-92-1	
Selenium	ND	mg/L	0.10	1	01/13/26 08:23	01/13/26 19:53	7782-49-2	
Silver	ND	mg/L	0.025	1	01/13/26 08:23	01/13/26 19:53	7440-22-4	
BVR 7470 Mercury, TCLP	Analytical Method: EPA 7470A Preparation Method: EPA 7470A Leachate Method/Date: EPA 1311; 01/12/26 11:45 Initial pH: 8.62; Final pH: 5.65 Pace Analytical Services - Beaver							
Mercury	ND	mg/L	0.00040	1	01/13/26 08:00	01/13/26 11:52	7439-97-6	
8260C MSV TCLP	Analytical Method: EPA 8260C Leachate Method/Date: EPA 1311; 01/15/26 12:56 Pace Analytical Services - Greensburg							
Benzene	ND	ug/L	50.0	10		01/19/26 15:59	71-43-2	
Surrogates								
1,2-Dichloroethane-d4 (S)	96	%.	70-130	10		01/19/26 15:59	17060-07-0	
Toluene-d8 (S)	93	%.	70-130	10		01/19/26 15:59	2037-26-5	
4-Bromofluorobenzene (S)	110	%.	70-130	10		01/19/26 15:59	460-00-4	
Dibromofluoromethane (S)	107	%.	70-130	10		01/19/26 15:59	1868-53-7	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

ANALYTICAL RESULTS

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

Sample: LOCATION - 2 **Lab ID: 30838012002** Collected: 01/06/26 14:47 Received: 01/07/26 20:00 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 6010D MET ICP, TCLP, 3010A	Analytical Method: EPA 6010D Preparation Method: EPA 3010A Leachate Method/Date: EPA 1311; 01/13/26 12:16 Initial pH: 8.56; Final pH: 5.98 Pace Analytical Services - Beaver							
Arsenic	ND	mg/L	0.10	1	01/14/26 08:40	01/14/26 18:40	7440-38-2	
Barium	**2.4**	mg/L	0.025	1	01/14/26 08:40	01/14/26 18:40	7440-39-3	
Cadmium	**0.056**	mg/L	0.010	1	01/14/26 08:40	01/14/26 18:40	7440-43-9	
Chromium	ND	mg/L	0.025	1	01/14/26 08:40	01/14/26 18:40	7440-47-3	
Lead	**0.14**	mg/L	0.050	1	01/14/26 08:40	01/14/26 18:40	7439-92-1	
Selenium	ND	mg/L	0.10	1	01/14/26 08:40	01/14/26 18:40	7782-49-2	
Silver	ND	mg/L	0.025	1	01/14/26 08:40	01/14/26 18:40	7440-22-4	
BVR 7470 Mercury, TCLP	Analytical Method: EPA 7470A Preparation Method: EPA 7470A Leachate Method/Date: EPA 1311; 01/13/26 12:16 Initial pH: 8.56; Final pH: 5.98 Pace Analytical Services - Beaver							
Mercury	ND	mg/L	0.00040	1	01/14/26 08:00	01/14/26 11:48	7439-97-6	
8260C MSV TCLP	Analytical Method: EPA 8260C Leachate Method/Date: EPA 1311; 01/15/26 12:56 Pace Analytical Services - Greensburg							
Benzene	ND	ug/L	50.0	10		01/19/26 17:17	71-43-2	
Surrogates								
1,2-Dichloroethane-d4 (S)	100	%.	70-130	10		01/19/26 17:17	17060-07-0	
Toluene-d8 (S)	93	%.	70-130	10		01/19/26 17:17	2037-26-5	
4-Bromofluorobenzene (S)	104	%.	70-130	10		01/19/26 17:17	460-00-4	
Dibromofluoromethane (S)	109	%.	70-130	10		01/19/26 17:17	1868-53-7	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

ANALYTICAL RESULTS

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

Sample: LOCATION - 3 **Lab ID: 30838012003** Collected: 01/06/26 14:50 Received: 01/07/26 20:00 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
BVR 6010D MET ICP, TCLP, 3010A	Analytical Method: EPA 6010D Preparation Method: EPA 3010A Leachate Method/Date: EPA 1311; 01/13/26 12:16 Initial pH: 8.61; Final pH: 6.03 Pace Analytical Services - Beaver							
Arsenic	ND	mg/L	0.10	1	01/14/26 08:40	01/14/26 18:51	7440-38-2	
Barium	**1.9**	mg/L	0.025	1	01/14/26 08:40	01/14/26 18:51	7440-39-3	
Cadmium	**0.024**	mg/L	0.010	1	01/14/26 08:40	01/14/26 18:51	7440-43-9	
Chromium	ND	mg/L	0.025	1	01/14/26 08:40	01/14/26 18:51	7440-47-3	
Lead	ND	mg/L	0.050	1	01/14/26 08:40	01/14/26 18:51	7439-92-1	
Selenium	ND	mg/L	0.10	1	01/14/26 08:40	01/14/26 18:51	7782-49-2	
Silver	ND	mg/L	0.025	1	01/14/26 08:40	01/14/26 18:51	7440-22-4	
BVR 7470 Mercury, TCLP	Analytical Method: EPA 7470A Preparation Method: EPA 7470A Leachate Method/Date: EPA 1311; 01/13/26 12:16 Initial pH: 8.61; Final pH: 6.03 Pace Analytical Services - Beaver							
Mercury	ND	mg/L	0.00040	1	01/14/26 08:00	01/14/26 12:02	7439-97-6	
8260C MSV TCLP	Analytical Method: EPA 8260C Leachate Method/Date: EPA 1311; 01/15/26 12:56 Pace Analytical Services - Greensburg							
Benzene	ND	ug/L	50.0	10		01/19/26 17:43	71-43-2	
Surrogates								
1,2-Dichloroethane-d4 (S)	97	%.	70-130	10		01/19/26 17:43	17060-07-0	
Toluene-d8 (S)	92	%.	70-130	10		01/19/26 17:43	2037-26-5	
4-Bromofluorobenzene (S)	114	%.	70-130	10		01/19/26 17:43	460-00-4	
Dibromofluoromethane (S)	106	%.	70-130	10		01/19/26 17:43	1868-53-7	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

QUALITY CONTROL DATA

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

QC Batch: 794419
QC Batch Method: EPA 3010A
Analysis Method: EPA 6010D
Analysis Description: 6010D MET ICP, TCLP, 3010A
Laboratory: Pace Analytical Services - Beaver
Associated Lab Samples: 30838012001

METHOD BLANK: 3875205 Matrix: Water
Associated Lab Samples: 30838012001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Arsenic	mg/L	ND	0.10	01/13/26 19:03	
Barium	mg/L	ND	0.025	01/13/26 19:03	
Cadmium	mg/L	ND	0.010	01/13/26 19:03	
Chromium	mg/L	ND	0.025	01/13/26 19:03	
Lead	mg/L	ND	0.050	01/13/26 19:03	
Selenium	mg/L	ND	0.10	01/13/26 19:03	
Silver	mg/L	ND	0.025	01/13/26 19:03	

LABORATORY CONTROL SAMPLE: 3876320

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/L	10	9.6	96	80-120	
Barium	mg/L	10	9.5	95	80-120	
Cadmium	mg/L	5	4.9	98	80-120	
Chromium	mg/L	10	9.5	95	80-120	
Lead	mg/L	10	9.5	95	80-120	
Selenium	mg/L	10	9.8	98	80-120	
Silver	mg/L	2.5	2.4	95	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3876321 3876322

Parameter	Units	30837699001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Arsenic	mg/L	ND	10	10	9.6	9.7	95	96	75-125	1	20	
Barium	mg/L	0.087	10	10	9.4	9.5	93	94	75-125	1	20	
Cadmium	mg/L	ND	5	5	4.8	4.8	95	96	75-125	1	20	
Chromium	mg/L	0.31	10	10	9.7	9.8	94	95	75-125	1	20	
Lead	mg/L	ND	10	10	9.3	9.4	93	94	75-125	1	20	
Selenium	mg/L	ND	10	10	9.8	9.9	97	99	75-125	1	20	
Silver	mg/L	ND	2.5	2.5	2.4	2.4	95	96	75-125	1	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

QUALITY CONTROL DATA

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

QC Batch: 794680
QC Batch Method: EPA 3010A
Analysis Method: EPA 6010D
Analysis Description: 6010D MET ICP, TCLP, 3010A
Laboratory: Pace Analytical Services - Beaver
Associated Lab Samples: 30838012002, 30838012003

METHOD BLANK: 3876585 Matrix: Water
Associated Lab Samples: 30838012002, 30838012003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Arsenic	mg/L	ND	0.10	01/14/26 18:32	
Barium	mg/L	ND	0.025	01/14/26 18:32	
Cadmium	mg/L	ND	0.010	01/14/26 18:32	
Chromium	mg/L	ND	0.025	01/14/26 18:32	
Lead	mg/L	ND	0.050	01/14/26 18:32	
Selenium	mg/L	ND	0.10	01/14/26 18:32	
Silver	mg/L	ND	0.025	01/14/26 18:32	

LABORATORY CONTROL SAMPLE: 3877597

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/L	10	9.6	96	80-120	
Barium	mg/L	10	9.6	96	80-120	
Cadmium	mg/L	5	5.0	100	80-120	
Chromium	mg/L	10	9.7	97	80-120	
Lead	mg/L	10	9.8	98	80-120	
Selenium	mg/L	10	10.2	102	80-120	
Silver	mg/L	2.5	2.4	97	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3877598 3877599

Parameter	Units	30838012002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Arsenic	mg/L	ND	10	10	9.7	9.7	97	96	75-125	1	20	
Barium	mg/L	2.4	10	10	11.6	11.6	93	92	75-125	0	20	
Cadmium	mg/L	0.056	5	5	4.9	4.9	98	97	75-125	1	20	
Chromium	mg/L	ND	10	10	9.7	9.7	97	97	75-125	1	20	
Lead	mg/L	0.14	10	10	9.7	9.7	96	96	75-125	0	20	
Selenium	mg/L	ND	10	10	10.3	10.2	103	102	75-125	0	20	
Silver	mg/L	ND	2.5	2.5	2.5	2.4	98	98	75-125	1	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

QUALITY CONTROL DATA

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

QC Batch: 794418
QC Batch Method: EPA 7470A
Analysis Method: EPA 7470A
Analysis Description: BVR 7470 Mercury TCLP
Laboratory: Pace Analytical Services - Beaver
Associated Lab Samples: 30838012001

METHOD BLANK: 3875205 Matrix: Water
Associated Lab Samples: 30838012001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/L	ND	0.00040	01/13/26 11:06	

LABORATORY CONTROL SAMPLE: 3876317

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/L	0.01	0.011	112	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3876318 3876319

Parameter	Units	30837699001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Mercury	mg/L	ND	0.01	0.01	0.011	0.011	111	110	80-120	1	20	H3

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

QUALITY CONTROL DATA

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

QC Batch: 794667
QC Batch Method: EPA 7470A
Analysis Method: EPA 7470A
Analysis Description: BVR 7470 Mercury TCLP
Laboratory: Pace Analytical Services - Beaver
Associated Lab Samples: 30838012002, 30838012003

METHOD BLANK: 3876585 Matrix: Water
Associated Lab Samples: 30838012002, 30838012003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/L	ND	0.00040	01/14/26 11:45	

LABORATORY CONTROL SAMPLE: 3877557

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/L	0.01	0.0093	93	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3877558 3877559

Parameter	Units	30838012002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Mercury	mg/L	ND	0.01	0.01	0.010	0.0099	102	99	80-120	2	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

QUALITY CONTROL DATA

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

QC Batch: 795620
QC Batch Method: EPA 8260C
Analysis Method: EPA 8260C
Analysis Description: 8260C MSV TCLP
Laboratory: Pace Analytical Services - Greensburg
Associated Lab Samples: 30838012001, 30838012002, 30838012003

LABORATORY CONTROL SAMPLE: 3882016

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Benzene	ug/L	20	18.1	90	63-130	
1,2-Dichloroethane-d4 (S)	%.			99	70-130	
4-Bromofluorobenzene (S)	%.			100	70-130	
Dibromofluoromethane (S)	%.			102	70-130	
Toluene-d8 (S)	%.			95	70-130	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3882014 3882015

Parameter	Units	30838012001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Benzene	ug/L	ND	200	200	128	131	64	66	10-136	2	30	
1,2-Dichloroethane-d4 (S)	%.						99	96	70-130			
4-Bromofluorobenzene (S)	%.						103	100	70-130			
Dibromofluoromethane (S)	%.						104	101	70-130			
Toluene-d8 (S)	%.						93	94	70-130			

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

QUALIFIERS

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

ANALYTE QUALIFIERS

H3 Sample was received or analysis requested beyond the recognized method holding time.

Pace Analytical Services, LLC
225 Industrial Park RD
Beaver, WV 25813
(800)999-0105

QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: DIRT SAMPLES 1-2026
Pace Project No.: 30838012

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
30838012001	**LOCATION - 1**	EPA 3010A	794419	EPA 6010D	794569
30838012002	**LOCATION - 2**	EPA 3010A	794680	EPA 6010D	794839
30838012003	**LOCATION - 3**	EPA 3010A	794680	EPA 6010D	794839
30838012001	**LOCATION - 1**	EPA 7470A	794418	EPA 7470A	794476
30838012002	**LOCATION - 2**	EPA 7470A	794667	EPA 7470A	794759
30838012003	**LOCATION - 3**	EPA 7470A	794667	EPA 7470A	794759
30838012001	**LOCATION - 1**	EPA 8260C	795620		
30838012002	**LOCATION - 2**	EPA 8260C	795620		
30838012003	**LOCATION - 3**	EPA 8260C	795620		

Pace® Location Requested (City/State):

CHAIN-OF-CUSTODY Analytical Request Document

Chain-of-Custody is a LEGAL DOCUMENT - Complete all relevant fields

WO# : 30838012

30838012

Company Name: Elkins Metal Recycling	Contact/Report To: Mindi Reams
Street Address: 21 High St. Elkins, WV 26241	Phone #: 304-635-0775
	E-Mail: ElkinsMetal@yahoo.com
	Cc E-Mail: JCLATTERBUCK1985@GMAIL.COM
Customer Project #:	Invoice to: Elkins Metal Recycling
Project Name: Dirt Samples 1-2026	Invoice E-mail:
Site Collection Info/Facility ID (as applicable):	Purchase Order # (if applicable):
	Quote #:
Time Zone Collected: [ ] AK [ ] PT [ ] MT [ ] CT [X] ET	County / State origin of sample(s): Randolph / WV

Data Deliverables: [ ] Level II [ ] Level III [ ] Level IV [ ] EQUIS [ ] Other_____

Regulatory Program (DW, RCRA, etc.) as applicable: Reportable [ ] Yes [ ] No

Rush (Pre-approval required): [ ] Same Day [ ] 1 Day [ ] 2 Day [ ] 3 Day Other _____

Date Results Requested:

DW PWSID # or WW Permit # as applicable:

Field Filtered (if applicable): [ ] Yes [ ] No

Analysis:

* Matrix Codes (Insert in Matrix box below): Drinking Water (DW), Ground Water (GW), Wastewater (WW), Product (P), Soil/Solid (SS), Oil (OL), Wipe (WP), Tissue (TS), Bioassay (B), Vapor (V), Surface Water (SW), Sediment (SED), Sludge (SL), Caulk (CK), Leachate (LL), Biosolid (BS), Other (OT)

Customer Sample ID	Matrix *	Comp / Grab	Composite Start Date	Composite Start Time	Collected or Composite End Date	Collected or Composite End Time	# Cont.	Residual Chlorine Result	Residual Chlorine Units
Location 1		G	1/6/26	2:32p	1/6/26	2:38p	5		
Location 2		G	1/6/26	2:43p	1/6/26	2:47p	5		
Location 3		G	1/6/26	2:50p	1/6/26	2:55p	5		

Specify Container Size **

Identify Container Preservative Type***

Analysis Requested

**Container Size: (1) 1L, (2) 500mL, (3) 250mL, (4) 125mL, (5) 100mL, (6) 40mL vial, (7) EnCore, (8) TerraCore, (9) 90mL, (10) Other

*** Preservative Types: (1) None, (2) HNO3, (3) H2SO4, (4) HCl, (5) NaOH, (6) Zn Acetate, (7) NaHSO4, (8) Sod. Thiosulfate, (9) Ascorbic Acid, (10) MeOH, (11) Other

Lab Use Only: Proj. Mgr: | AcctNum / Client ID: | Table #: | Profile / Template: | Prelog / Bottle Ord. ID:

Sample Comment

Preservation non-conformance identified for sample.

NON-CONFORMANCE
No Preserves
No Analyses
No Matrix

Additional Instructions from Pace® :

Collected By: Jimmy Clatterbuck
Printed Name
Signature

Customer Remarks / Special Conditions / Possible Hazards:

# Coolers:	Thermometer ID:	Correction Factor (°C):	Obs. Temp. (°C):	Corrected Temp. (°C):	On Ice
1	X1	0	1.7	1.7	Yes

	Date/Time		Date/Time
Relinquished by/Company: (Signature)	1/7/26 915	Received by/Company: (Signature)	1/7/26 915
Relinquished by/Company: (Signature)	1/7/26 1400	Received by/Company: (Signature)	1/7/26 1400
Relinquished by/Company: (Signature)	1/7/26 1600	Received by/Company: (Signature) 1-7-26	1600
Relinquished by/Company: (Signature) 1-7-26	2000	Received by/Company: (Signature) 1-7-26	2000

Tracking Number:

Delivered by: [ ] In- Person [ ] Courier [ ] FedEX [ ] UPS [ ] Other

Page: of

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ENV-FRM-CORQ-0019_v02_110123 ©

3 packs w/ 3 tubes / 2 jars

WO#: 30838012
PM: BMJ Due Date: 01/22/26
CLIENT: BV-ELKMETREC

LIMS30 Lab Sample Condition Upon Receipt (West Virg

Custody Seal on Cooler/Box/Containers Present: ☐ Yes ☑ No   Seals intact: ☐ Yes ☑ No

Thermal Preservation Requirement Met Yes ☑ No ☐

pH paper Lot#	Date and Initials of person examining contents:
201524	kw 1-8-26

	Yes	No	N/A	
Chain of Custody Present:	✓			1.
Chain of Custody Filled Out:		✓		2. no pres codes, no analyses
Chain of Custody Relinquished:	✓			3. no matrix
Sampler Name & Signature on COC:	✓			4.
Sample Labels match COC:	✓			5.
-Includes date/time/ID Matrix: SS				
Samples Arrived within Hold Time:	✓			6.
Short Hold Time Analysis (<72hr remaining):	✓			7.
Rush Turn Around Time Requested:		✓		8.
Sufficient Volume:	✓			9.
Correct Containers Used:	✓			10.
-Pace Containers Used:	✓			
Containers Intact:	✓			11.
Orthophosphate field filtered:			✓	12.
Hex Cr Aqueous sample field filtered:			✓	13.
-pH adjusted within 24 hours? (If yes, indicate acid lot #)			✓	
Filtered volume received for Dissolved tests:			✓	14.
All containers have been checked for chemical preservation:			✓	15.
exceptions: VOA, coliform, O&G, LLMercury, Non-aqueous matrix				
All containers meet method/chemical preservation requirements:			✓	Initial when completed: kw Date: 1-8-26
				Tests not preserved:
Headspace in VOA Vials:		✓		16.
Trip Blank Present:			✓	17.
				Initial when completed: kw Date: 1-8-26

Comments:

*__PM review__ is documented electronically in LIMS, when the Project Manager closes the SRF Review schedule in LIMS. The status may be reviewed in the Status section of the Workorder Edit Screen.

Pace® Location Requested (City/State):

CHAIN-OF-CUSTODY Analytical Request Document

Chain-of-Custody is a LEGAL DOCUMENT - Complete all relevant fields

WO# : 30838012

30838012

Company Name: Elkins Metal Recycling
Street Address: 21 High St. Elkins, WV 26241
Customer Project #:
Project Name: Dirt Samples 1-2026
Site Collection Info/Facility ID (as applicable):

Contact/Report To: Mindi Reams
Phone #: 304-636-0775
E-Mail: Elkinsmetal@yahoo.com
Cc E-Mail: JCLATTERBUCK1985@GMAIL.com
Invoice to: Elkins Metal Recycling
Invoice E-mail:
Purchase Order # (if applicable):
Quote #:

Time Zone Collected: [ ] AK [ ] PT [ ] MT [ ] CT [X] ET

County / State origin of sample(s): Randolph / WV

Data Deliverables: [ ] Level II [ ] Level III [ ] Level IV [ ] EQUIS [ ] Other

Regulatory Program (DW, RCRA, etc.) as applicable: Reportable [ ] Yes [ ] No

Rush (Pre-approval required): [ ] Same Day [ ] 1 Day [ ] 2 Day [ ] 3 Day Other

Date Results Requested:

DW PWSID # or WW Permit # as applicable:

Field Filtered (if applicable): [ ] Yes [ ] No

Analysis:

* Matrix Codes (Insert in Matrix box below): Drinking Water (DW), Ground Water (GW), Wastewater (WW), Product (P), Soil/Solid (SS), Oil (OL), Wipe (WP), Tissue (TS), Bioassay (B), Vapor (V), Surface Water (SW), Sediment (SED), Sludge (SL), Caulk (CK), Leachate (LL), Biosolid (BS), Other (OT)

Specify Container Size **

Identify Container Preservative Type***

Analysis Requested

**Container Size: (1) 1L, (2) 500mL, (3) 250mL, (4) 125mL, (5) 100mL, (6) 40mL vial, (7) EnCore, (8) TerraCore, (9) 90mL, (10) Other

*** Preservative Types: (1) None, (2) HNO3, (3) H2SO4, (4) HCl, (5) NaOH, (6) Zn Acetate, (7) NaHSO4, (8) Sod. Thiosulfate, (9) Ascorbic Acid, (10) MeOH, (11) Other

Lab Use Only: Proj. Mgr: / AcctNum / Client ID: / Table #: / Profile / Template: / Prelog / Bottle Ord. ID:

Preservation non-conformance identified for sample.

Customer Sample ID	Matrix *	Comp / Grab	Composite Start Date	Composite Start Time	Collected or Composite End Date	Collected or Composite End Time	# Cont.	Residual Chlorine Result	Residual Chlorine Units	Sample Comment
Location 1		G	1/6/26	2:32p	1/6/26	2:38p	5			
Location 2		G	1/6/26	2:43p	1/6/26	2:47p	5			
Location 3		G	1/6/26	2:50p	1/6/26	2:55p	5			

Received by Pace Greensburg
Therm ID 25 Corr Factor +/- 0.0
Receipt Temp 3.7
Corrected Temp 3.7
Correct Preservation (Y)/N
Res. Chlorine Y/N Lot # N/A
Rad Samples Screened <0.05 mrem/hr-(Y)/N
Survey Meter: 25014380

NON-CONFORMANCE
No preservation
No analyses
No matrix

Additional Instructions from Pace®:

Collected By: Printed Name: Jimmy Clatterbuck
Signature: [signature]

Customer Remarks / Special Conditions / Possible Hazards:

# Coolers:	Thermometer ID:	Correction Factor (°C):	Obs. Temp. (°C):	Corrected Temp. (°C):	[ ] On Ice
1	JL	0	1.1	1.1	Yes

Relinquished by/Company: (Signature)	Date/Time:	Received by/Company: (Signature)	Date/Time:
[signature]	1/7/26 915	Randy Moran	1/7/26 915
Randy Moran	1/7/26 1400	[signature]	1/7/26 1400
[signature]	1/7/26 1600	[signature] 1-7-26	1600
[signature] 1-7-26	2000	[signature] 1-7-26	2000

Tracking Number:

Delivered by: [ ] In-Person [/] Courier [ ] FedEX [ ] UPS [ ] Other

Page: of

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ENV-FRM-CORQ-0019_v02_110123 ©

3 packs w/ 3 tubes / 2 jars

Pace® Location Requested (City/State):

CHAIN-OF-CUSTODY Analytical Request Document

Chain-of-Custody is a LEGAL DOCUMENT - Complete all relevant fields

LAB USE ONLY- Affix Workorder/Login Label Here

30838012

Scan QR Code for instructions

Company Name:	Contact/Report To:
Street Address:	Phone #:
	E-Mail:
	Cc E-Mail:
Customer Project #:	
Project Name:	Invoice To:
	Invoice E-Mail:
Site Collection Info/Facility ID (as applicable):	Purchase Order # (if applicable):
	Quote #:
Time Zone Collected: [ ] AK [ ] PT [ ] MT [ ] CT [ ] ET	County / State origin of sample(s):
Data Deliverables: [ ] Level II [ ] Level III [ ] Level IV [ ] EQUIS [ ] Other	Regulatory Program (DW, RCRA, etc.) as applicable: Reportable [ ] Yes [ ] No
	Rush (Pre-approval required): [ ] Same Day [ ] 1 Day [ ] 2 Day [ ] 3 Day [ ] Other _____
	DW PWSID # or WW Permit # as applicable:
	Date Results Requested:
	Field Filtered (If applicable): [ ] Yes [ ] No
	Analysis:

Specify Container Size **

Identify Container Preservative Type***

Analysis Requested

**Container Size: (1) 1L, (2) 500mL, (3) 250mL, (4) 125mL, (5) 100mL, (6) 40mL vial, (7) EnCore, (8) TerraCore, (9) 90mL, (10) Other

*** Preservative Types: (1) None, (2) HNO3, (3) H2SO4, (4) HCl, (5) NaOH, (6) Zn Acetate, (7) NaHSO4, (8) Sod. Thiosulfate, (9) Ascorbic Acid, (10) MeOH, (11) Other

Lab Use Only: Proj. Mgr.; Acct.Num. / Client ID:; Table #:; Profile / Template:; Prelog / Bottle Ord. ID:

Preservation non-conformance identified for sample.

* Matrix Codes (Insert in Matrix box below): Drinking Water (DW), Ground Water (GW), Waste Water (WW), Product (P), Soil/Solid (SS), Oil (OL), Wipe (WP), Tissue (TS), Bioassay (B), Vapor (V), Surface Water (SW),Sediment (SED), Sludge (SL), Caulk (CK), Leachate (LL), Biosolid (BS), Other (OT)

Customer Sample ID	Matrix *	Comp / Grab	Composite Start Date	Composite Start Time	Collected or Composite End Date	Collected or Composite End Time	# Cont.	Res. Chlorine Results	Res. Chlorine Units	Sample Comment

Additional Instructions from Pace®:

Collected By: (Printed Name)

Signature:

Customer Remarks / Special Conditions / Possible Hazards:

# Coolers:	Thermometer ID:	Correction Factor (°C):	Obs. Temp. (°C)	Corrected Temp. (°C)	On Ice:

Relinquished by/Company: (Signature)	Date/Time: 1/8/26 1538	Received by/Company: (Signature) Nicely's Del. Service	Date/Time: 1/8/26 1900	Tracking Number:	
Relinquished by/Company: (Signature) Nicely's Del. Service	Date/Time: 1/8/26 2300	Received by/Company: (Signature)	Date/Time: 1/8/26 2300	Delivered by: [ ] In-Person [ ] Courier [ ] FedEx [ ] UPS [ ] Other	
Relinquished by/Company: (Signature)	Date/Time:	Received by/Company: (Signature)	Date/Time:		
Relinquished by/Company: (Signature)	Date/Time:	Received by/Company: (Signature)	Date/Time:	Page: of	

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ENV-FRM-CORQ-0019_v02_110123 ©

WO#: 30838012
PM: BMJ Due Date: 01/22/26
CLIENT: BV-ELKMETREC

LIMS30 Lab Sample Condition Upon Receipt (West Virg

Custody Seal on Cooler/Box/Containers Present: ☐ Yes ☑ No

Seals intact: ☐ Yes ☑ No

Thermal Preservation Requirement Met Yes ☑ No ☐

pH paper Lot#	Date and Initials of person examining contents
201524	KW 1-8-26

	Yes	No	N/A	
Chain of Custody Present:	✓			1.
Chain of Custody Filled Out:		✓		2. no pres codes, [illegible]
Chain of Custody Relinquished:	✓			3. no [illegible]
Sampler Name & Signature on COC:	✓			4.
Sample Labels match COC:	✓			5.
-Includes date/time/ID Matrix: SS				
Samples Arrived within Hold Time:	✓			6.
Short Hold Time Analysis (<72hr remaining):	✓			7.
Rush Turn Around Time Requested:		✓		8.
Sufficient Volume:	✓			9.
Correct Containers Used:	✓			10.
-Pace Containers Used:	✓			
Containers Intact:	✓			11.
Orthophosphate field filtered:			✓	12.
Hex Cr Aqueous sample field filtered:			✓	13.
-pH adjusted within 24 hours? (If yes, indicate acid lot #)			✓	
Filtered volume received for Dissolved tests:			✓	14.
All containers have been checked for chemical preservation: exceptions: VOA, coliform, O&G, LLMercury, Non-aqueous matrix			✓	15.
All containers meet method/chemical preservation requirements:			✓	Initial when completed KW Date: 1-8-26
				Tests not preserved:
Headspace in VOA Vials:		✓		16.
Trip Blank Present:			✓	17.
				Initial when completed: KW Date: 1-8-26

Comments:

*PM review is documented electronically in LIMS, when the Project Manager closes the SRF Review schedule in LIMS. The status may be reviewed in the Status section of the Workorder Edit Screen.

Base Penalty Calculation

(pursuant to 47CSR1-6.1)

Responsible Party: Elkins Metal Recycling, LLC **Receiving Stream:** Tygart Valley River

Treatment System Design Maximum Flow: 0.0014 **MGD**

Treatment System Actual Average Flow: **MGD** (if known)

Enter FOF# and rate each finding as to Potential and Extent.

1)	Potential for Harm Factor	Factor Range	FOF# 5a	6b	8b	9ai	9aii	9aiii	9b	9c					
a)	Amount of Pollutant Released	1 to 3	1	1	1	1	1	1	1	1					
b)	Toxicity of Pollutant	0 to 3	1	1	1	1	1	1	0	0					
c)	Sensitivity of the Environment	0 to 3	1	1	1	1	1	1	0	0					
d)	Length of Time	1 to 3	1	2	3	1	1	1	3	1					
e)	Actual Exposure and Effects thereon	0 to 3	1	1	1	1	1	1	0	0					
	Average Potential for Harm Factor		1	1.2	1.4	1	1	1	0.8	0.4	No	No	No	No	No
2)	**Extent of Deviation Factor**	**Factor Range**													
	Degree of Non-Compliance	1 to 3	3	3	3	1	2	3	3	1					

Potential for Harm Factors:

1)c - Sensitivity of the Environment Potentially Affected (0 for "dead" stream)

1)d - Length of Time of Violation

1)e - Actual Human/Environmental Exposure and Resulting Effects thereon

Examples/Guidance:

Note: Rate as 1 for Minor, 2 for Moderate and 3 for Major. Rate as 0 if it does not apply.

Minor = exceedance of permit limit by <=40% for Avg. Monthly or <=100% for Daily Max., exceed numeric WQ standard by <= 100%, or report doesn't contain some minor information.

Moderate = exceedance of permit limit by >= 41% and <= 300% for Avg. Monthly , >= 101% and <= 600% for Daily Max., exceed numeric WQ standard by >= 101% and <= of 600% or report doesn't fully address intended subject matter.

Major = exceedance of permit limit by >= 301% for Avg. Monthly, >= 601% for Daily Max., exceed numeric WQ standard by >= 601%, failure to submit a report, failure to obtain a permit, failure to report a spill, etc. Note that a facility in SNC should be rated as major for length of time and degree of non-compliance.

Narrative WQ standard violations - case-by-case.

Continue rating Findings of Facts (FOF) here, if necessary. Otherwise, continue on Page 3.

1)	Potential for Harm Factor	Factor Range	FOF#												
a)	Amount of Pollutant Released	1 to 3													
b)	Toxicity of Pollutant	0 to 3													
c)	Sensitivity of the Environment	0 to 3													
d)	Length of Time	1 to 3													
e)	Actual Exposure and Effects thereon	0 to 3													
	Average Potential for Harm Factor		No	No	No	No	No	No	No	No	No	No	No	No	No
2)	**Extent of Deviation Factor**	**Factor Range**													
	Degree of Non-Compliance	1 to 3													

		Extent of Deviation from Requirement		
		Major	**Moderate**	**Minor**
Potential for Harm to Human Health or the Environment	**Major**	$8,000 to $10,000	$6,000 to $8,000	$5,000 to $6,000
	Moderate	$4,000 to $5,000	$3,000 to $4,000	$2,000 to $3,000
	Minor	$1,500 to $2,000	$1,000 to $1,500	Up to $1,000

FOF #	Potential for Harm	Extent of Deviation	Penalty	Multiple Factor	Base Penalty
5a	Minor	Major	$2,000	1	$2,000
6b	Moderate	Major	$4,200	1	$4,200
8b	Moderate	Major	$4,400	1	$4,400
9ai	Minor	Minor	$1,000	3	$3,000
9aii	Minor	Moderate	$1,500	3	$4,500
9aiii	Minor	Major	$2,000	2	$4,000
9b	Minor	Major	$1,900	1	$1,900
9c	Minor	Minor	$400	1	$400
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
0	FALSE	FALSE	FALSE	1	$0
Total Base Penalty					$24,400

Penalty Adjustment Factors

(pursuant to 47CSR1-6.2)

Penalty Adjustment Factor

6.2.b.1 - Degree of or absence of willfulness and/or negligence - 0% to 30% increase
6.2.b.4 - Previous compliance/noncompliance history - 0% to 100% increase - based upon review of last three (3) years - Warning = maximum of 5% each, N.O.V. = maximum of 10% each, previous Order = maximum of 25% each - Consistent DMR violations for <1 year = 10% maximum, for >1 year but <2 years = 20% maximum, for >2 years but <3 years = 30% maximum, for >3 years = 40 % maximum

6.2.b.6 - Economic benefits derived by the responsible party (increase to be determined)

6.2.b.7 - Public Interest (increase to be determined)

6.2.b.8 - Loss of enjoyment of the environment (increase to be determined)

6.2.b.9 - Staff investigative costs (increase to be determined)
6.2.b.10 - Other factors

Size of Violator: 0 - 50% decrease

NOTE: This factor is not available to discharges that are causing a water quality violation. This factor does not apply to a commercial or industrial facility that employees or is part of a corporation that employees more than 100 individuals.

Avg. Daily WW Discharge Flow (gpd)	% Reduction Factor
< 5,000	50
5,000 to 9,999	40
10,000 to 19,999	30
20,000 to 29,999	20
30,000 to 39,999	10
40,000 to 99,999	5
> 100,000	0

Additional Other factors to be determined for increases or decreases on a case-by-case basis.

Public Notice Costs (cost for newspaper advertisement)
6.2.b.2 - Good Faith - 10% decrease to 10% increase
6.2.b.3 - Cooperation with the Secretary - 0% to 10% decrease
6.2.b.5 - Ability to pay a civil penalty - 0% to 100% decrease

Base Penalty Adjustments

(pursuant to 47CSR1-6.2)

Penalty Adjustment Factor	% Increase	% Decrease	Base Penalty Adjustments
6.2.b.1 - Willfulness and/or negligence -	10		$2,440
6.2.b.4 - Compliance/noncompliance history -			$0
6.2.b.6 - Economic benefits - (flat monetary increase)			$0
6.2.b.7 - Public Interest - (flat monetary increase)			$0
6.2.b.8 - Loss of enjoyment - (flat monetary increase)			$0
6.2.b.9 - Investigative costs - (flat monetary increase)			$0
6.2.b.10 - Other factors (size of violator)			$0
6.2.b.10 - Additional Other Factors - Increase (flat monetary increase)			$0
6.2.b.10 - Additional Other Factors - Decrease (flat monetary decrease)			$0
Public Notice Costs (flat monetary increase)	$30		$30
6.2.b.2 - Good Faith - Increase			$0
6.2.b.2 - Good Faith - Decrease			$0
6.2.b.3 - Cooperation with the Secretary		10	($2,440)
6.2.b.5 - Ability to Pay			$0
Penalty Adjustments			**$30**
Penalty =			**$24,430**

Estimated Economic Benefit Item	Estimated Benefit ($)
Monitoring & Reporting	
Installation & Maintenance of Pollution Control Equipment	
O&M expenses and cost of equipment/materials needed for compliance	
Permit Application or Modification	
Competitive Advantage	
Estimated Economic Benefit	**$0**

Comments: Economic benefit not warranted.