

September 13, 2021

Mr. Kaveh Hosseinzadeh
Senior Engineer
Solid Waste Program
Maryland Department of the Environment
1800 Washington Boulevard, Suite 605
Baltimore, Maryland 21230

**Re: Montgomery County Resource Recovery Facility
Combined Ash Stream TCLP Results**

Dear Mr. Hosseinzadeh:

Attached please find the semi-annual ash test results for the second half of 2021, in accordance with Part III D of the Facility's Waste Disposal Permit. The samples were collected and analyzed in accordance with the Facility's Semi-Annual Ash Sampling Procedure previously submitted to the Department. Summary sample data the last 36 samples are also attached.

Should you have any questions, or require further information, please contact Steve Sprague at the Authority at 410-333-2730 or ssprague@nmwda.org. Thank you.

Sincerely,

Andrew Kays
Andrew Kays (Sep 13, 2021 14:49 EDT)

Andrew Kays
Executive Director

Attachments

cc: Montgomery County - Willie Wainer, Lonnie Heflin. Joe LaDana
Covanta - Mike Pope, Eli Golfer
NMWDA - Steve Sprague

410.333.2730 / 410.333.2721 fax / authority@nmwda.org
nmwda.org / Business-to-Business Recycling: mdrecycles.org
Tower II – Suite 402, 100 S. Charles Street, Baltimore, MD 21201-2705

Comprehensive Waste Management Through Recycling, Reuse, Resource Recovery and Landfill

MCF119096SSLU.DOCX

MEMBERS:

Rhody R. Holthaus, Anne Arundel County / Vacant, Baltimore City / D'Andrea L. Walker, Baltimore County / Jeffrey D. Castonguay, Carroll County
Phillip S. Harris, Frederick County / Joseph J. Siemek, Harford County / Mark A. DeLuca, Howard County / Guillermo Wainer, Montgomery County
Charles Glass, Maryland Environmental Service / Andrew Kays, Executive Director



REGIME I REPORT TABLE 2
LABORATORY RESULTS FOR THE
MONTGOMERY COUNTY MD RESOURCE RECOVERY FACILITY
SAMPLE-SPECIFIC RESULTS FOR TCLP METALS AND PAINT FILTER

These data are and will be from the most recent 36 samples for all eight TCLP metals.

Date Collected	Sample Identification Number	Arsenic (mg/l)	Barium (mg/l)	Cadmium (mg/l)	Chromium (mg/l)	Lead (mg/l)	Selenium (mg/l)	Silver (mg/l)	Mercury (mg/l)	Paint Filter
5/25/2016	MONT/CA/TCLP/052516-A	ND	ND	ND	ND	ND	ND	ND	<0.00064	ND
5/26/2016	MONT/CA/TCLP/052616-A	ND	< 0.11	ND	ND	ND	ND	ND	0.0011	ND
5/27/2016	MONT/CA/TCLP/052716-A	ND	< 0.1	ND	ND	ND	ND	ND	0.00095	ND
11/29/2016	MONT/CA/TCLP/112916-A	< 0.05	0.476	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.0004	ND
11/30/2016	MONT/CA/TCLP/113016-A	< 0.05	0.497	< 0.05	< 0.05	0.448	< 0.05	< 0.05	< 0.0004	ND
12/1/2016	MONT/CA/TCLP/120116-A	< 0.05	0.475	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.0004	ND
1/10/2017	MONT/CA/TCLP/011017-A	< 0.05	0.512	< 0.05	< 0.05	< 0.05	0.058	< 0.05	< 0.0004	ND
1/11/2017	MONT/CA/TCLP/011117-A	< 0.05	0.619	< 0.05	< 0.05	< 0.05	0.067	< 0.05	< 0.0004	ND
1/12/2017	MONT/CA/TCLP/011217-A	< 0.05	0.773	< 0.05	< 0.05	0.732	0.121	< 0.05	< 0.0004	ND
9/14/2017	MONT_CA_TCLP_091417_A	< 0.05	0.537	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	0.001	ND
9/15/2017	MONT_CA_TCLP_091517_A	< 0.05	0.606	< 0.05	< 0.05	< 0.05	0.054	< 0.05	0.0011	ND
9/16/2017	MONT_CA_TCLP_091617_A	< 0.05	0.541	< 0.05	< 0.05	< 0.05	0.056	< 0.05	< 0.0004	ND
2/12/2018	MONT_CA_TCLP_021218_A	< 0.05	0.488	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	0.001	ND
2/13/2018	MONT_CA_TCLP_021318_A	< 0.05	0.561	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.0004	ND
2/14/2018	MONT_CA_TCLP_021418_A	< 0.05	0.609	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.0004	ND
7/10/2018	MONT_CA_TCLP_071018_A	< 0.05	0.562	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	0.0006	ND
7/11/2018	MONT_CA_TCLP_071118_A	< 0.05	0.452	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	0.004	ND
7/12/2018	MONT_CA_TCLP_071218_A	< 0.05	0.677	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	0.0007	ND
1/28/2019	MONT/CA/012819/1100_A	< 0.05	0.509	< 0.05	< 0.05	< 0.05	0.079	< 0.05	0.0006	ND
1/29/2019	MONT/CA/012919/1100_A	< 0.05	0.607	< 0.05	< 0.05	< 0.05	0.072	< 0.05	< 0.0004	ND
1/31/2019	MONT/CA/013119/1100_A	< 0.05	0.572	< 0.05	< 0.05	< 0.05	0.065	< 0.05	< 0.0004	ND
9/23/2019	MONT/CA/092319/1200_A	< 0.05	0.445	< 0.05	< 0.05	< 0.05	0.54	< 0.05	0.0005	ND
9/24/2019	MONT/CA/092419/1200_A	< 0.05	0.42	< 0.05	< 0.05	< 0.05	0.059	< 0.05	0.001	ND
9/25/2019	MONT/CA/092519/1200_A	< 0.05	0.42	< 0.05	< 0.05	< 0.05	0.054	< 0.05	0.0008	ND
3/16/2020	MONT/CA/031620/1200_A	< 0.05	0.608	< 0.05	< 0.05	< 0.05	0.06	< 0.05	< 0.0004	ND
3/17/2020	MONT/CA/031720_1200_A	< 0.05	0.474	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.0004	ND
3/18/2020	MONT/CA/031820/1200_A	< 0.05	0.518	< 0.05	< 0.05	< 0.05	0.084	< 0.05	< 0.0004	ND
7/6/2020	MONT/CA/070620_A	< 0.05	0.411	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.0004	ND
7/7/2020	MONT/CA/070720_A	< 0.05	0.389	< 0.05	< 0.05	< 0.05	0.121	< 0.05	0.0008	ND
7/8/2020	MONT/CA/070820_A	< 0.05	0.412	< 0.05	< 0.05	< 0.05	0.088	< 0.05	0.0011	ND
3/2/2021	MONT/CA/030221	< 0.05	0.678	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.0004	ND
3/3/2021	MONT/CA/030321	< 0.05	0.632	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.0004	ND
3/4/2021	MONT/CA/030421	< 0.05	0.52	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.0004	ND
7/26/2021	MON/CA/072621	< 0.05	0.557	< 0.05	< 0.05	< 0.05	0.064	< 0.05	0.0007	ND
7/27/2021	MON/CA/072721	< 0.05	0.51	< 0.05	< 0.05	< 0.05	0.066	< 0.05	0.0012	ND
7/28/2021	MON/CA/072821	< 0.05	0.668	0.071	< 0.05	< 0.05	< 0.05	< 0.05	< 0.0004	ND
1/2 of Detection Limit (mg/l)		0.25	0.25	0.05	0.25	0.25	0.05	0.25	0.0002	
Regulatory Threshold (mg/l)		5.0	100.0	1.0	5.0	5.0	1.0	5.0	0.2	

For Paint Filter test, "ND" means no apparent free liquid detected.

Going forward, the 3 added samples in the rolling Regime 1 evaluation data set will be taken from semi-annual reporting due each Dec 31 & June 30.

The laboratory sheets for each sample will be appended for all values.

REGIME I REPORT TABLE 3
MONTGOMERY COUNTY MD RESOURCE RECOVERY FACILITY
STATISTICAL RESULTS FOR TRACE METALS

CONSTITUENT	Arsenic	Barium	Cadmium	Chromium	Lead	Selenium	Silver	Mercury
MAXIMUM (mg/l)	0.05	0.773	0.071	0.05	0.732	0.54	0.05	0.004
MINIMUM (mg/l)	0.05	0.1	0.05	0.05	0.05	0.05	0.05	0.0004
NUMBER OF SAMPLES	33	35	33	33	33	33	33	36
DEGRESS OF FREEDOM	32	34	32	32	32	32	32	35
SAMPLE MEAN (mg/l)	0.050	0.513	0.051	0.050	0.083	0.076	0.050	0.001
SAMPLE VARIANCE (mg/l)	0.000	0.018	0.000	0.000	0.018	0.007	0.000	0.000
STANDARD DEVIATION (mg/l)	0.014	0.158	0.015	0.014	0.132	0.084	0.014	0.001
STANDARD ERROR (mg/l)	0.002	0.027	0.003	0.002	0.023	0.015	0.002	0.000
90% SINGLE-TAIL UPPER BOUND (mg/l)	0.053	0.549	0.054	0.053	0.114	0.096	0.053	0.001
REGIME I ASH TESTING THRESHOLD (mg/l)	-vs-	-vs-	-vs-	-vs-	-vs-	-vs-	-vs-	-vs-
	4.25	85	0.85	4.25	4.25	0.85	4.25	0.17

Note: The 90% Upper Confidence Interval as single-tailed distribution is equivalent to the 80% Upper Confidence Interval as a two-tailed distribution.






MCF119096SSLU Semi-Annual Ash Report MDE CY2021-2

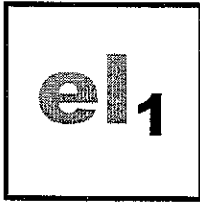
Final Audit Report

2021-09-13

Created:	2021-09-13
By:	Sabrina Ross (sross@nmwda.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAArP8FhmVF8e_iDkXgMeqURtyrD1UorPVn

"MCF119096SSLU Semi-Annual Ash Report MDE CY2021-2" History

-  Document created by Sabrina Ross (sross@nmwda.org)
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-  Document e-signed by Andrew Kays (akays@nmwda.org)
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Element One Inc.
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elementOne

SUMMARY OF TCLP ANALYSES
Element One, Inc. Project Number e37098

Covanta Montgomery
21204 Martinsburg Rd.
Dickerson, MD 20846


August 9, 2021
Client Project Name
Client Project Number

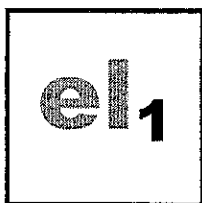
Sample ID: MON_CA_pH_072621

Sample Matrix	Combined Ash	Sample Type	4H Composite	Date Received	08/02/2021
Date Combined	07/26/2021	Time Sampled	0700	Time Received	1310
Sampler	Eli Golfer	Delivered by	UPS	Received by	KLG

Extraction Begun	08/02/21 1615	Extraction Ended	08/03/21 0830	E1 Sample #	37098-1
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Parameter	Result	Unit	Calc. RL	Dilution	DL	Method	Date
Chromium, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Arsenic, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Selenium, TCLP digested	0.064	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Silver, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Cadmium, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Barium, TCLP digested	0.557	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Lead, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Mercury, TCLP digested	0.0007	mg/L	0.0004	2	0.0002	EPA 1311/7470A	08/04/21
Solids	82.4	%				SM2540G	08/02/21
pH, Initial	12.80	SU				EPA 1311	08/02/21
Fluid Determination pH	10.97	SU				EPA 1311	08/02/21
TCLP pH, Final	10.16	SU				EPA 1311	08/03/21
pH, Extraction Fluid #2	2.88	SU				EPA 1311	08/02/21


Ken Smith, Laboratory Director



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SUMMARY OF TCLP ANALYSES
Element One, Inc. Project Number e37098

Covanta Montgomery
21204 Martinsburg Rd.
Dickerson, MD 20846

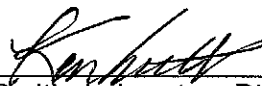
August 9, 2021
Client Project Name
Client Project Number

Sample ID: MON_CA_pH_072721

Sample Matrix	Combined Ash	Sample Type	4H Composite	Date Received	08/02/2021
Date Combined	07/27/2021	Time Sampled	0700	Time Received	1310
Sampler	Eli Golfer	Delivered by	UPS	Received by	KLG

Extraction Begun	08/02/21 1615	Extraction Ended	08/03/21 0830	E1 Sample #	37098-2
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Parameter	Result	Unit	Calc. RL	Dilution	DL	Method	Date
Chromium, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Arsenic, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Selenium, TCLP digested	0.066	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Silver, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Cadmium, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Barium, TCLP digested	0.510	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Lead, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Mercury, TCLP digested	0.0012	mg/L	0.0004	2	0.0002	EPA 1311/7470A	08/04/21
Solids	81.4	%				SM2540G	08/02/21
pH, Initial	12.55	SU				EPA 1311	08/02/21
Fluid Determination pH	10.17	SU				EPA 1311	08/02/21
TCLP pH, Final	9.42	SU				EPA 1311	08/03/21
pH, Extraction Fluid #2	2.88	SU				EPA 1311	08/02/21


Kerri Smith, Laboratory Director

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37098 Covanta Montgomery Metals Report 1-3 Compiled by 

Certifications: NJ NELAP NC009, NY ELAP 11889, NC DW 37788 and NC DWQ DENR 604



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SUMMARY OF TCLP ANALYSES
Element One, Inc. Project Number e37098

Covanta Montgomery
21204 Martinsburg Rd.
Dickerson, MD 20846

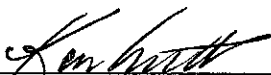
August 9, 2021
Client Project Name
Client Project Number

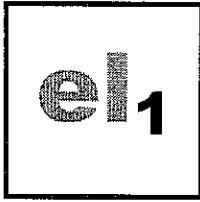
Sample ID: MON_CA_pH_072821

Sample Matrix	Combined Ash	Sample Type	4H Composite	Date Received	08/02/2021
Date Combined	07/28/2021	Time Sampled	0700	Time Received	1310
Sampler	Eli Golfer	Delivered by	UPS	Received by	KLG

Extraction Begun	08/02/21 1615	Extraction Ended	08/03/21 0830	E1 Sample #	37098-3
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Parameter	Result	Unit	Calc. RL	Dilution	DL	Method	Date
Chromium, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Arsenic, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Selenium, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Silver, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Cadmium, TCLP digested	0.071	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Barium, TCLP digested	0.668	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Lead, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Mercury, TCLP digested	< 0.0004	mg/L	0.0004	2	0.0002	EPA 1311/7470A	08/04/21
Solids	84.1	%				SM2540G	08/02/21
pH, Initial	12.68	SU				EPA 1311	08/02/21
Fluid Determination pH	9.01	SU				EPA 1311	08/02/21
TCLP pH, Final	8.00	SU				EPA 1311	08/03/21
pH, Extraction Fluid #2	2.88	SU				EPA 1311	08/02/21


Ken Smith, Laboratory Director



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FINAL REPORT OF ANALYSES
Element One, Inc. Project Number e37098

Covanta Montgomery
21204 Martinsburg Rd.
Dickerson, MD 20846

August 9, 2021
Client Project Name
Client Project Number

Sample ID: TCLP Extraction Blank

Sample Matrix	Combined Ash	Sample Type	4H Composite	Date Received	08/02/2021
Date Combined	07/26-28/2021	Time Sampled	0700	Time Received	1310
Sampler	Eli Golfer	Delivered by	UPS	Received by	KLG

Extraction Begun	08/02/21 1615	Extraction Ended	08/03/21 0830	E1 Sample #	37098-Blk
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Parameter	Result	Unit	Calc. RL	Dilution	DL	Method	Date
Chromium, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Arsenic, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Selenium, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Silver, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Cadmium, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Barium, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Lead, TCLP digested	< 0.05	mg/L	0.05	50	0.001	EPA 1311/6020B	08/06/21
Mercury, TCLP digested	< 0.0004	mg/L	0.0004	2	0.0002	EPA 1311/7470A	08/04/21
pH, Extraction Fluid #2	2.88	SU				EPA 1311	08/02/21
Chromium, Spike Recovery	99	%		50	0.001	EPA 1311/6020B	08/06/21
Arsenic, Spike Recovery	96	%		50	0.001	EPA 1311/6020B	08/06/21
Selenium, Spike Recovery	95	%		50	0.001	EPA 1311/6020B	08/06/21
Silver, Spike Recovery	94	%		100	0.001	EPA 1311/6020B	08/06/21
Cadmium, Spike Recovery	99	%		50	0.001	EPA 1311/6020B	08/06/21
Barium, Spike Recovery	94	%		50	0.001	EPA 1311/6020B	08/06/21
Lead, Spike Recovery	98	%		50	0.001	EPA 1311/6020B	08/06/21
Mercury, Spike Recovery	97	%		2	0.0002	EPA 1311/7470A	08/04/21

Ken Smith, Laboratory Director

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Certifications: NJ NELAP NC009, NY ELAP 11889, NC DW 37788 and NC DWQ DENR 604



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FINAL REPORT OF ANALYSES -PAINT FILTER TEST
Element One, Inc. Project Number e37098

Covanta Montgomery, Inc.
21204 Martinsburg Road
Dickerson, MD 20842

August 13, 2021
Client Project Name
Client Project Number

Sample Matrix	Combined Ash	Sample Type	4H Composite	Date Received	08/02/2021
Date Combined	07/26-28/2021	Time Sampled	0700	Time Received	1310
Sampler	Eli Golfer	Delivered by	UPS	Received by	KLG
Method	SW846-9095B	Date Analyzed	08/12/2021	E1 Sample #	37098-1-3

Sample ID	MON_CA_pH_072621	MON_CA_pH_072721	MON_CA_pH_072821
Paint Filter Test	Deemed to Contain No Free Liquid	Deemed to Contain No Free Liquid	Deemed to Contain No Free Liquid

Ken Smith, Laboratory Director

Page 1 of 1

37098 Covanta Montgomery Paint Filter Test Report 1-3 Compiled by

Certifications: NJ NELAP NC009, NY ELAP 11889, NC DW 37788 and NC DWQ DENR 604



CHAIN OF CUSTODY - ASH

Designed for DMS

Lab ID # 37098 Page 1 of 1

Facility: Montgomery	PO#	Report to (Email): <u>egolfer@covanta.com</u>	+ Email ID
Address: 21204 Madinsburg Road	Billing Information, if different:		+ Email ID
Contact Name: Eli Goller	Email: <u>egolfer@covanta.com</u>	Phone: 301-691-9000	Project ID
Delivery Date	TAT (circle one)	Rush: 1-Day 2-Day 3-Day	
	Normal		

Instructions: Use legend shown below to identify Purpose, Sample Location, Ash Type and Sample Type. For changes to COC, contact the Corporate Ash Team.

Purpose	Sample Location		Ash Type		Sample Type				Sample Collection Date	Sample Collection Start Time	# Container (s)	Analyses Requested	Notes:
	Characterize	Belt	Combined Ash: CA	Other	Composite			Other					
	Process Knowledge	Crane	Bottom Ash: BA	2-Hr. 2H	Daily: DC	Tuek: TR	Grab: GR						
R&D		FEL/Front/End Loader	Top Ash: FA	4-Hr. 4H	Week: WC	Day Shift: AM							
			Ratio Sample: RS	6-Hr. 6H	Month: MC	Night Shift: PM							
				8-Hr. 8H	Quarter: QC								
Ref No.	Sample ID on Label (3-DigitFacID/AshTypeDate/Time)	Purpose	Sample Location	Ash Type	Sample Type	Sample #	Aliquot #	Sample Collection Date	Sample Collection Start Time	# Container (s)	Analyses Requested	Notes:	
1	MON_CA_ph_072621	Process Knowledge	Belt	CA	4H	1	1	7/26/2021	7:00-AM	1	TCP Fluid PH TCP Metals	Please send us the final pH.	
2	MON_CA_ph_072721	Process Knowledge	Belt	CA	4H	1	1	7/27/2021	7:00-AM	1			
3	MON_CA_ph_072821	Process Knowledge	Belt	CA	4H	1	1	7/28/2021	7:00-AM	1			
4													
5													
6													
7													
8													
9													
10													

Collected by	Name: Eli Goller	Date: 7/29/2021	Signature: <i>Eli Goller</i>
Relinquished by	Name: Eli Goller	Date: 7/29/2021	Signature: <i>Eli Goller</i>
Received for Lab by	Name: <i>K-Grattis</i>	Date: <i>8/2/21</i>	Signature: <i>[Signature]</i>
Lab Notes	<i>samples rec'd via VPS in good condition</i>		
	Time: <i>1310</i>		