

ADEM



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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MONTGOMERY, ALABAMA

WWW.ADEM.STATE.AL.US

(334) 271-7700

JAMES W. WARR
DIRECTOR (Acting)

BOB RILEY
GOVERNOR

January 31, 2005

CERTIFIED MAIL # 7004 1160 0006 6052 5144
RETURN RECEIPT REQUESTED

John M. Richardson
Richardson Brothers Wood Preserving, Inc.
3rd Avenue
Northport AL 35476

Subject: ADEM Consent Order No. 05-041-CHW

Dear Mr. Richardson:

Enclosed please find Consent Order No. 05-041-CHW which requires Richardson Brothers Wood Preserving, Inc. to take certain actions in regard to alleged violations of the Alabama Hazardous Waste Management and Minimization Act. This Order has been issued with your consent and is final and not appealable.

If you have any questions, please feel free to contact Sadiqua Williams-Davis at (334) 271-7740.

Sincerely;

Wm. Gerald Hardy, Chief
Land Division

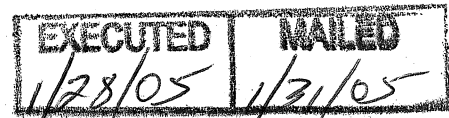
SWD/set

Enclosure

cc: Olivia Rowell, ADEM-General Counsel
Jeff Pallas, US EPA Region 4

Facsimiles: (334)

Administration: 271-7950
General Counsel: 394-4332
Air: 279-3044
Land: 279-3050
Water: 279-3051
Groundwater: 270-5631
Field Operations: 272-8131
Laboratory: 277-6718
Mining: 394-4326
Education/Outreach: 394-4383



Birmingham Branch
110 Vulcan Road
Birmingham, Alabama 35209-4702
(205) 942-6168
(205) 941-1603 [Fax]

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, Alabama 35603-1333
(256) 353-1713
(256) 340-9359 [Fax]

Mobile Branch
2204 Perimeter Road
Mobile, Alabama 36615-1131
(251) 450-3400
(251) 479-2593 [Fax]

Mobile - Coastal
4171 Commanders Drive
Mobile, Alabama 36615-1421
(251) 432-6533
(251) 432-6598 [Fax]



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ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IN THE MATTER OF:)
)
RICHARDSON BROTHERS)
WOOD PRESERVING, INC.)
3rd AVENUE)
NORTHPORT, AL 35746)
U. S. EPA NUMBER ALD093187169)
_____)

CONSENT ORDER NO. 05-041-CHW

FINDINGS

Pursuant to the provisions of the Alabama Environmental Management Act, Code of Alabama (1975), §§ 22-22A-1 through 22-22A-16, as amended, and the Alabama Hazardous Wastes Management and Minimization Act, of 1978 Code of Alabama (1975), §§ 22-30-1 through 22-30-24, as amended, the ADEM Administrative Code of Regulations (hereinafter "ADEM Admin. Code R.") promulgated pursuant thereto, and the federal Solid Wastes Disposal Act, 42 U.S.C. §§ 6901 through 6992k, as amended, and without the adjudication of any issues of fact or law and upon the consent of the parties concerned hereto, the Alabama Department of Environmental Management (hereinafter "the Department") makes the following FINDINGS:

1. Richardson Brothers Wood Preserving, Inc. (hereinafter "RBWP" or "respondent"), located in Tuscaloosa (Tuscaloosa County), Alabama, operates a wood preserving plant that pressure treats wood products with chromated copper arsenate (CCA), a water-borne

inorganic preservative. RBWP is a small quantity generator of hazardous waste that has been assigned EPA ID Number ALD093187169.

2. The Department is a duly constituted department of the State of Alabama pursuant to §§ 22-22A-1 through 22-22A-16, Code of Alabama, (1975).

3. Pursuant to Code of Alabama (1975), § 22-22A-4(n), as amended, the Department is the state agency responsible for the promulgation and enforcement of solid and hazardous waste regulations in accordance with the federal Solid Waste Disposal Act, 42 U.S.C. 3251, et. seq. as amended, including §§ 6901 through 6992k, as amended. In addition, the Department is authorized to administer and enforce the provisions of the Alabama Hazardous Wastes Management and Minimization Act, Code of Alabama (1975), §§ 22-30-1 through 22-30-24, as amended.

4. ADEM, in conjunction with the Environmental Protection Agency (EPA), conducted a compliance evaluation inspection of RBWP on August 20, 2003. Because of the inspection, RBWP was issued a Notice of Violation (NOV) dated October 1, 2003, which cited various violations of state hazardous waste regulations. More specifically, the violations were described in part, as follows:

- a) An engineer's written assessment of the existing (old) portion of the drip pad (constructed prior to December 6, 1990) was not available. Therefore, RBWP is in violation of ADEM Admin. Code R. 335-14-6-.23(2)(a) which requires a facility to keep on file an engineer's written assessment of drip pads constructed prior to December 6, 1990, and to annually re-certify the assessment until standards are met.
- b) A written plan, certified by an engineer, for upgrading the existing drip pad to meet standards was not available and has not been submitted to ADEM. Therefore,

RBWP is in violation of ADEM Admin. Code R. 335-14-6-.23(2)(b) which requires a written plan, certified by an engineer, be developed for upgrading the old drip pad to meet standards, and submitted to ADEM no later than two (2) years before the upgrade completion.

- c) Cracks in the existing pad where repairs had been made have re-appeared.

Therefore, RBWP is in violation of ADEM Admin. Code R. 335-14-6-.23(4)(c) which requires drip pads to be free of cracks, gaps, corrosion, or other deterioration.

- d) The existing drip pad used temporarily to store treated lumber is not protected from precipitation, allowing rainwater and CCA treatment debris to wash into the old containment area. The berm of the old containment area consists of concrete blocks that on the lower side have cracks that have not been repaired. Therefore, because of the state of disrepair of the old containment area, RBWP is in violation of ADEM Admin. Code R. 335-14-6-.23(d) which requires that an "...associated collection system must be designed and operated to ... collect liquid resulting from drippage or precipitation in order to prevent runoff."

- e) The berm of approximately two (2) inches on the upper east side of the new pad has overflow stains on the outside of the berm. There is an area approximately fifty (50) feet from the south side of the existing pad with green stained chips on the ground that appears to have received runoff from the drip pad. Therefore, RBWP is in violation of ADEM Admin. Code R. 335-14-6-.23(4)(m) that requires conditions that have or may have caused releases to be repaired within a reasonable time.

- f) Written procedures to ensure that waste is removed from the pad and collection system at least once every ninety (90) days were not available. Therefore, RBWP is

in violation of ADEM Admin. Code R. 335-14-3-.03(5)(a)1(iii)(I) and (II) which require a description of procedures to be kept on file to ensure that waste is removed from the drip pad and collection system at least once every ninety (90) days and the required documentation of each such waste removal.

- g) The drip pad is inspected, cleaned, and swept twice per month but there was no record of quantity of waste removed from the pad and collection system. Therefore, RBWP is in violation of ADEM Admin. Code R. 335-14-6-.23(5)(b)1.-3, which requires drip pads to be inspected weekly and after storms to detect problems with run-on and run-off control systems; leakage in and proper operation of the leak detection system; and deterioration of the drip pad surface. Also, ADEM Admin. Code R. 335-14-3-.03(5)(a)1.(iii)(II) requires documentation to be kept of each waste removal, including date and time of removal and *quantity of waste* removed from the drip pad and collection system.
- h) The used fluorescent lamps had been disposed in the dumpster. Therefore, RBWP is in violation of ADEM Admin. Code R. 335-14-3-.01(2), which requires a waste determination before waste is disposed and/or ADEM Admin. Code R. 335-14-11-.02 that allows waste lamps to be managed as universal waste.
- i) The two hundred fifty (250) gallon used oil tank beside the shop was not labeled. Therefore, RBWP is in violation of ADEM Admin. Code R. 335-14-17-.03(4)(c), which requires containers and above ground tanks to be labeled with the words "Used Oil", legible from at least twenty-five (25) feet.
- j) There were oil releases on the concrete pad underneath the used oil tank and on the ground beside the concrete pad. Therefore, RBWP is in violation of ADEM Admin.

Code R. 335-14-17-.03 (4)(d)1.-4., which require that, upon detection of a release, the release should be stopped; the used oil contained and cleaned up along with other materials; and repair/replace leaking containers or tanks prior to using again..

- k) RBWP has not notified as a Small Quantity Generator (SQG) since 1995.

Therefore, RBWP is in violation of ADEM Admin. Code R. 335-14-3-.01(4)(a), which requires that a SQG [located and operating in Tuscaloosa County] submit ADEM Form 8700-12 annually by February 15 along with the appropriate fees.

5. On January 28, 2004, EPA and ADEM personnel conducted a Compliance Schedule Evaluation with sampling of RBWP. The results of the sampling are in the attached Table 1. The inspectors collected four (4) soil samples around a containment area, one (1) sample approximately fifty (50) feet south of the pad area, and one (1) background sample (column #6 in the attached Table 1). They also made the following observations:

- a) Written procedures to ensure that waste is removed from the pad and collection system at least once every ninety (90) days was not available for review as required by Admin. Code R. 335-14-3-.03(5)(a)1(iii)(I) and (II). This finding was also noted during the August 20, 2003 CEI.
- b) Documentation noting the quantity of waste removed from the pad and collection system was not available for review as required by ADEM Admin. Code R. 335-14-3-.03(5)(a)1.(iii)(II). This finding was also noted during the August 20, 2003 CEI.
- c) Green-colored/stained wood chips were observed on the ground in an area approximately fifty (50) feet from the south side of the existing pad. This finding was also noted during the August 20, 2003 CEI.

- d) In the hazardous waste storage area, seventeen (17) drums of hazardous waste were not labeled as required by ADEM Admin. Code R. 335-14-3-.03(5)(a)3. This Rule requires that while being accumulated on-site each container and tank is labeled or marked clearly with the words "Hazardous Waste" and the EPA hazardous waste number.
- e) In the hazardous waste storage area, drums containing hazardous waste were grouped together with no aisle space between them as required by ADEM Admin. Code R. 335-14-6-.03(6). This regulation requires the site where hazardous waste is stored to have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.
- f) Corrections to some items of noncompliance noted in the August 20, 2003 inspection had been made by RBWP. Approximately 2 ½ inches of berm was added on the west side of the old pad between the pad and the old containment area. The used oil tank was labeled "Used Oil" and a containment area was added underneath and around the oil tank. The area referred to in subparagraph e) above was dug up and removed while the inspectors were at the site on January 28, 2004.

6. The assessment of civil penalties for violations of the Department's rules and regulations, and for violations of any order, permit condition, license, certification or variance issued by the Department is authorized by Code of Alabama 1975, § 22-22A-5(18), as amended. The statute also authorizes that the penalty amount may range from \$100 to \$25,000 per day for each violation, so long as the penalty amount does not exceed \$250,000 in any given order. Each

day a violation continues constitutes a separate violation. In addition to the foregoing “findings”, the Department has considered the factors detailed in the aforementioned statute in determining the appropriate penalty amount in this particular instance. Those factors are listed as follows:

- A. The seriousness of the violation, including any irreparable harm to the environment and any threat to the health or safety of the public;
- B. The standard of care manifested by the respondent;
- C. The economic benefit which delayed compliance may have conferred upon the respondent;
- D. The nature, extent, and degree of success of the respondent’s efforts to minimize or mitigate the effects of such violations upon the environment;
- E. The respondent’s history of previous violations; and
- F. The respondent’s ability to pay the assessed penalty.

7. RBWP neither admits nor denies the Findings contained in this Consent Order. However, in an effort to cooperate with the Department and to resolve the allegations cited above, RBWP consents to the terms of this Order.

8. The Department agrees to this Consent Order upon a determination that the terms are in the best interests of the citizens of Alabama in resolving the alleged violations cited hereinabove.

ORDER

Based upon the foregoing FINDINGS and pursuant to §§ 22-22A-5(10), 22-22A-5(12), 22-22A-5(18), 22-28-10(2) and 22-28-18, Code of Alabama 1975, as amended, and with the consent of Richardson Brothers Wood Processing, Inc. it is hereby ORDERED:

A. That, within thirty (30) days from the date of receipt of this Consent Order and continuing thereafter, RBWP shall provide to the Department an engineer's written assessment of the existing (old) portion of the drip pad (constructed prior to December 6, 1990) and to annually re-certify the assessment until standards are met in accordance with ADEM Admin. Code R. 335-14-6-.23(2)(a).

B. That, within thirty (30) days from the date of receipt of this Consent Order and continuing thereafter, RBWP shall provide to the Department a written plan to include drawings and a work schedule with completion date, certified by an engineer, for upgrading the existing drip pad to meet standards, and the submission of same to ADEM in accordance with ADEM Admin. Code R. 335-14-6-.23(2)(b) and (c).

C. That, within thirty (30) days from the date of receipt of this Consent Order and continuing thereafter, RBWP shall ensure that cracks in the existing pad are repaired and certified by an engineer in accordance with ADEM Admin. Code R. 335-14-6-.23(4)(c).

D. That, within thirty (30) days from the date of receipt of this Consent Order, RBWP shall provide to the Department a written documentation, which demonstrates the corrective action taken to repair the berm of the old containment area, to include the concrete on the lower side and the slab used for a floor, or methods to be used to ensure that waste does not wash into the old containment area in accordance with ADEM Admin. Code R. 335-14-6-.23(4)(d).

E. That, within thirty (30) days from the date of receipt of this Consent Order, RBWP shall provide to the Department a written description, prepared by an engineer, of the steps taken to ensure the berm surrounding the drip pads is sufficient to prevent overflow in accordance with ADEM Admin. Code R. 335-14-6-.23(4)(d).

F. That, within fifteen (15) days from the date of receipt of this Consent Order, RBWP shall have written procedures on file for waste removal from the drip pad and collection system at least once every ninety (90) days and the required documentation of each such waste removal, to include the quantity of waste removed, is kept on file at the facility for inspection in accordance with ADEM Admin. Code R. 335-14-3-.03(5)(a)1(iii)(I) and (II).

G. That, immediately upon the execution of this Consent Order, RBWP shall document date and time of removal and *quantity of waste removed* from the drip pad and collection system in accordance with ADEM Admin. Code R. 335-14-3-.03(5)(a)1(iii)(II). In addition, the drip pads are to be inspected weekly in accordance with ADEM Admin. Code R. 335-14-6-23((5)(b)1.-3.

H. That, immediately upon the execution of this Consent Order, RBWP shall ensure that used fluorescent lamps are managed properly, either in accordance with ADEM Admin. Code R. 335-14-3-.01(2), which requires a waste determination before disposal or ADEM Admin. Code R. 335-14-11-.02, which allows waste lamps to be managed as universal waste.

I. That, immediately upon the execution of this Consent Order, RBWP shall ensure that tanks and containers of generated used oil are labeled properly in accordance with ADEM Admin. Code R. 335-14-17-.03(4)(c).

J. That, immediately upon the execution of this Consent Order, RBWP shall ensure oil releases, upon detection, are stopped, cleaned up along with other materials, and leaking containers or tanks are repaired or replaced prior to re-use in accordance with ADEM Admin. R. 335-14-17-.03 (4)(d)1.-4.

K. That, immediately upon the execution of this Consent Order and continuing thereafter, RBWP shall ensure an ADEM Form 8700-12 is submitted by 15 February each year in accordance with ADEM Admin. Code R. 335-14-3-.01(4).

L. That, immediately upon the execution of this Consent Order and continuing thereafter, RBWP shall ensure that containers of hazardous waste are labeled or marked clearly with the words “Hazardous Waste” and the EPA hazardous waste number in accordance with ADEM Admin. Code R. 335-14-3-.03(5)(a)(3).

M. That, immediately upon the execution of this Consent Order and continuing thereafter, RBWP shall ensure adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes, in accordance with ADEM Admin. Code R. 335-14-6-.03(6).

N. That, upon the execution of this Consent Order and continuing thereafter, RBWP shall immediately comply with all applicable generator requirements of ADEM Admin. R. 335-14-3 and ADEM Admin. R. 335-14-6.

O. That, not later than thirty (30) days after receipt of notice of this Consent Order, RBWP shall submit to the Department a complete Conversion Plan (CP), which describes the procedures RWBP will implement to convert from CCA to a preservative that does not generate RCRA hazardous waste. The CP must be based on the three options described in Appendix 1 of this Order. The CP must be acceptable to the Department and in accordance with the applicable requirements of ADEM Admin. Code R. 335-14-6-.23(6), “Alabama Environmental Investigation and Remediation Guidance” document, and “EPA Region 9 Preliminary Remediation Goals Table User’s Guide/Technical Background Document”.

P. That, RBWP will undertake the following acts within the times specified below:

- 1) Within forty-five (45) days of the effective date of this Consent Order, RBWP shall submit to ADEM for approval a Sampling Plan (SP) that will determine the extent and level of contamination at the facility. The SP shall include a timetable for implementation.
- 2) ADEM will either: (i) approve the Sampling Plan; (ii) approve the Sampling Plan with modifications; or (iii) notify RBWP, in writing, of deficiencies in the Sampling Plan and grant RBWP an additional thirty (30) days in which to modify the plan.
- 3) Within fifteen (15) days of ADEM's approval of the Sampling Plan, RBWP shall implement the Sampling Plan in accordance with the provisions and schedules contained therein.
- 4) RBWP shall submit a Sampling Report to ADEM for approval within thirty (30) days of completion of the Sampling Plan. The Sampling Report shall summarize the extent and level of the contamination of the Chemicals of Concern (COC) at the site, and shall propose corrective action if necessary. The Sampling Report shall contain a schedule for implementation of any corrective action that shall be required.
- 5) ADEM will either: (i) approve the Sampling Report; (ii) approve the Sampling Report with modifications; or (iii) notify RBWP, in writing, of deficiencies in the Sampling Report and grant RBWP an additional thirty (30) days in which to take corrective action that will modify the report.

6) Within fifteen (15) days of ADEM's approval of the Sampling Report, RBWP shall implement the proposed corrective action, if any, in accordance with the provisions and schedules contained therein.

7) The information required to be submitted under this Section shall be mailed to:

Wm. Gerald Hardy, Chief
Land Division
Alabama Department of Environmental Management
PO Box 301463
Montgomery, AL 36130-1463

Q. That, if RBWP or ADEM determines that remediation is not possible and/or that the groundwater has been adversely impacted, then RBWP shall submit a complete Closure and Contingent Post-Closure Plan by no later than forty-five (45) days past completion of the Sampling Report. The closure and post closure plan shall be acceptable to the Department and in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.07(2) through 335-14-5-.07(6). The post closure plan should also contain inspection schedules and inspection logs as required by ADEM Admin. Code R. 335-14-5-.06, and all appropriate data and records as required by ADEM Admin. Code R. 335-14-5-.07. If clean closure can not be achieved, the closure and post-closure plan shall comply with the requirements of ADEM Admin. Code R. 335-14-5-.07(7) through 335-14-5-.07(11) and 335-14-5-.14(11). The closure plan and contingent post-closure plan shall address all areas of soil and groundwater contamination identified by the site assessment addressed in paragraph O.; shall include proposed cleanup standards and justification; a full description of the methods by which this site will be remediated and by which attainment of cleanup standards will be confirmed; shall comply with all requirements of ADEM Admin. Code R. 335-14-6-.07; and shall be accompanied by all applicable fees. Upon a determination pursuant to this condition

that post-closure is required, this Consent Order shall be amended to include appropriate provisions for post-closure care, groundwater monitoring, and corrective action. A proposed implementation schedule must be submitted at least 180 days prior to the date on which closure is expected to begin.

R. That, not later than forty-five (45) days after receipt of notice of this Consent Order, RBWP shall pay to the Department a Civil Penalty in the amount of fifteen thousand dollars (**\$15,000**) for violations contained herein. This penalty shall be made payable by certified or cashier's check to ADEM and shall be remitted to:

**Office of General Counsel
Alabama Department of Environment Management
Post Office Box 301463
Montgomery, Alabama 336130-1463**

S. The check shall reference RBWP's name and address, and the ADEM Consent Order number of this action.

T. That, subject to the terms of these presents and subject to provisions otherwise provided by statute, this Consent Order is intended to operate as a full resolution of the violations that are cited in this Consent Order.

U. That, upon the effective date of this Consent Order, RBWP shall comply with the provisions of this Order until a determination is made in writing by the Department that all obligations have been, or are, fulfilled and the Order is terminated.

V. That, RBWP is not relieved from any liability if it fails to comply with any provision of this Consent Order.


W. That, for purposes of this Consent Order only, RBWP agrees that the Department may properly bring an action to compel compliance with the terms and conditions

contained herein in a court of competent jurisdiction, including, but not limited to, Montgomery County Circuit Court. RBWP also agrees that in any action brought by the Department to compel compliance with the terms of this Agreement, RBWP shall be limited to the defenses of *Force Majeure*, compliance with this Agreement, and physical impossibility. A *Force Majeure* is defined as any event arising from causes that are not foreseeable and are beyond the reasonable control of RBWP, including its contractors and consultants, which could not be overcome by due diligence (i.e., causes which could have been overcome or avoided by the exercise of due diligence will not be considered to be beyond the reasonable control of RBWP) and which delays or prevents performances by a date required by the Consent Order. Events such as unanticipated or increased costs of performance, changed economic circumstances, normal precipitation events, or failure to obtain federal, state, or local permits shall not constitute *Force Majeure*.

X. That this Order does not preclude the Department from taking other enforcement actions based on these facts regarding violations of other regulatory programs. Should additional facts and circumstances be discovered in the future concerning RBWP which would constitute possible violations not addressed in this Consent Order, or if the violations noted herein continue, then such future violations shall be addressed in Orders as may be issued by the Department, litigation initiated by the Department, or such other enforcement action as may be appropriate, and RBWP shall not object to such future orders, litigation, or enforcement action based on the issuance of this Consent Order.

Y. That, by agreement of the parties, this Consent Order shall be considered final and effective immediately upon signature of all parties. This Consent Order shall not be appealable, and RBWP does hereby waive any hearing on the terms and conditions of same.

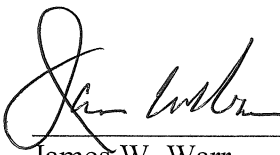
RICHARDSON BROTHERS WOOD
PRESERVING INC



John M. Richardson

Date 10/21/04

ALABAMA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT



James W. Warr (Acting Director)

Date 28 Apr 2005

TABLE 1

SUMMARY OF INORGANICS ANALYSES
RICHARDSON BROTHERS WOOD PRESERVING

28-Jan-04

Metals Scan

ANALYTE	UNIT	1		2		3		4		5		6	
% Moisture	%	17	A	8.2		15		20		29		15	
Aluminum	MG/KG	3100		950		4400		6200		3500		2600	A
Arsenic	MG/KG	3700		8500		1300		860		820			U
Barium	MG/KG	21		49		17		29		72		40	A
Calcium	MG/KG	1600		44000		970		1800		5000		1200	A
Chromium	MG/KG	1200		6100		470		1300		1200		7.9	A
Cobalt	MG/KG	2.3		40	J	6.1		6.8		4.6		2.3	A
Copper	MG/KG	2700		4500		1000		450		220		3.1	A
Iron	MG/KG	7500		3600		15000		26000		12000		12000	A
Lead	MG/KG	16			U	11		28		23		8.2	A
Magnesium	MG/KG	220		8500		160		190		730		230	A
Manganese	MG/KG	97		240		350		310		220		220	A
Molybdenum	MG/KG				U		U	1.6		1.1		0.63	AJ
Nickel	MG/KG				U		U	3.4		7.1		1.6	A
Potassium	MG/KG				U		U		U		U	290	A
Strontium	MG/KG	5.1		37		6.2		8.1		13		7.8	A
Titanium	MG/KG	28		8.2		21		20		33		36	A
Total													
Mercury	MG/KG	0.67		0.13		0.18	AJ	0.24		0.23			U
Vanadium	MG/KG	13			U	20		22		12		11	A
Yttrium	MG/KG	4.7			U	2.2		3.2		5.6		2.3	A
Zinc	MG/KG	24		12		27		31		39		14	A

TCLP Scan

ANALYTE	UNIT	1		2		3		4		5		6	
Arsenic	MG/L	40	A	8.7	A	7.5		0.51		0.62			U
Chromium	MG/L	1.6	A	0.23	A	0.2		0.14		0.06			U

Data Qualifiers

U - Analyte not detected at or above reporting limit.

A - Analyte analyzed in replicate. Reported value is "average" of replicates.

J - Identification of analyte is acceptable; reported value is an estimate.