

1106 Vernon Road, Suite A, Lake Stevens, WA 98258

(425) 334-8588 · Fax (425) 335-5947 Web Address: lkstevenssewer.org

Water Quality Permit Coordinator Northwest Regional Office Washington State Department of Ecology 3190 160th Avenue SE Bellevue, WA 98008-5452

Regarding: Whether a general permit is the appropriate tool to control and reduce nutrients in discharges from WWTP's to Puget Sound.

Dear Ecology:

The answer to the above question is no, a general permit is not the appropriate tool to control and reduce nutrients in discharges from WWTP's to Puget Sound. A general permit would not take into account a WWTP's receiving water, present or future capacity to remove nutrients, or the ability of its ratepayers to bear the burden of cost. This last point is perhaps the most poignant: a blanket general permit such as this would adversely affect the poorest and most vulnerable members of our population, as those communities would be held to the same standard as wealthier ones, without consideration of how the ratepayers would cover the cost. Wealthy communities will have an easier time either buying their way out of these limits or purchasing, installing and maintaining the technology needed to achieve nutrient reductions.

The Lake Stevens Sewer District believes it would be more important to invest in efforts to quantify non-point source, agricultural, and Victorian inputs of nutrients into Puget Sound before requiring the expenditure of billions of dollars. While WWTP's may appear to be low hanging fruit, that fruit is small and withered compared to other yet-to-be quantified inputs of nutrient sources to Puget Sound. If this must happen immediately, we ask that a means of funding be included in order to protect those ratepayers in the most vulnerable portions of society.

Because the receiving waters of the Lake Stevens Sewer District have not been sampled in a long time, and this comment period encouraged submitting data about receiving waters, LSSD sampled Ebey Slough upstream and downstream of its outfall. Sampling was conducted 150' north and south of the outfall via grab sample from a boat. Because Ebey Slough is a marine estuary with flow direction dependent on the tide, sampling occurred while the tide was coming in (flowing north) and when the tide was flowing out (flowing south). The mixing zone for this outfall is 215' in length, and sampling was conducted outside of this zone. During the first sampling, the downstream sample was 0.01 mg/L lower in Total Inorganic Nitrogen (TIN) than the upstream sample. When the tides changed, again the downstream sample was 0.01 mg/L lower than the upstream sample. Supplemental information for this sampling event is included in the following pages.

We are dedicated to protecting and enhancing water resources in Puget Sound, and are hoping for a collaborative approach that gets most impact per dollar spent.

Thank you for your consideration, Caitlin Hubbard, Lake Stevens Sewer District

Ebey Slough Sampling

Background/Introduction

The WA State Department of Ecology has opened a comment period from August 21, 2019 – October 21, 2019 to answer the following question:

"Whether a general permit is the appropriate tool to control and reduce nutrients in discharges from domestic wastewater treatment plants (WWTPs) to Puget Sound. This public comment period is also an opportunity to provide us other relevant information about WWTPs and Puget Sound water quality. For example, you may submit any documented information on the characteristics of the discharge (individually or categorically) including effluent quantity, quality, and any receiving water impacts."

The suggested Total Inorganic Nitrogen (TIN) limit for all Western Washington WWTP's is 8 mg/L. The average TIN for LSSD's final effluent in 2019 through September is 17 mg/L. The LSSD WWTP has an average ammonia load of 34 mg/L, which is a portion of TIN loading but has no official data with respect to TIN inputs. The LSSD WWTP is a Membrane Bioreactor plant with the ability to nitrify and do some denitrifying. At the time the above question was asked, the Lake Stevens Sewer District (LSSD) did not have data on hand with respect to receiving water quality, so a sampling event of its receiving water (Ebey Slough) was conducted on September 4, 2019.

Materials and Methods

Because Ebey Slough is a tidal marine estuary, water flows north when the tide is going in and south when the tide is going out. Two sampling trips were made via boat to sample upstream and downstream of the LSSD WWTP outfall; one trip when the tide was on its way in and one when the tide was on its way out. The LSSD Mixing Zone is 215 feet long, and samples were gathered outside of this zone, at approximately 150' north and south of the outfall. Samples were gathered via grab sample from the side of the boat, were preserved with 0.5 mL of H_2SO_4 , and transported to Edge Analytical for analysis within the required time period.

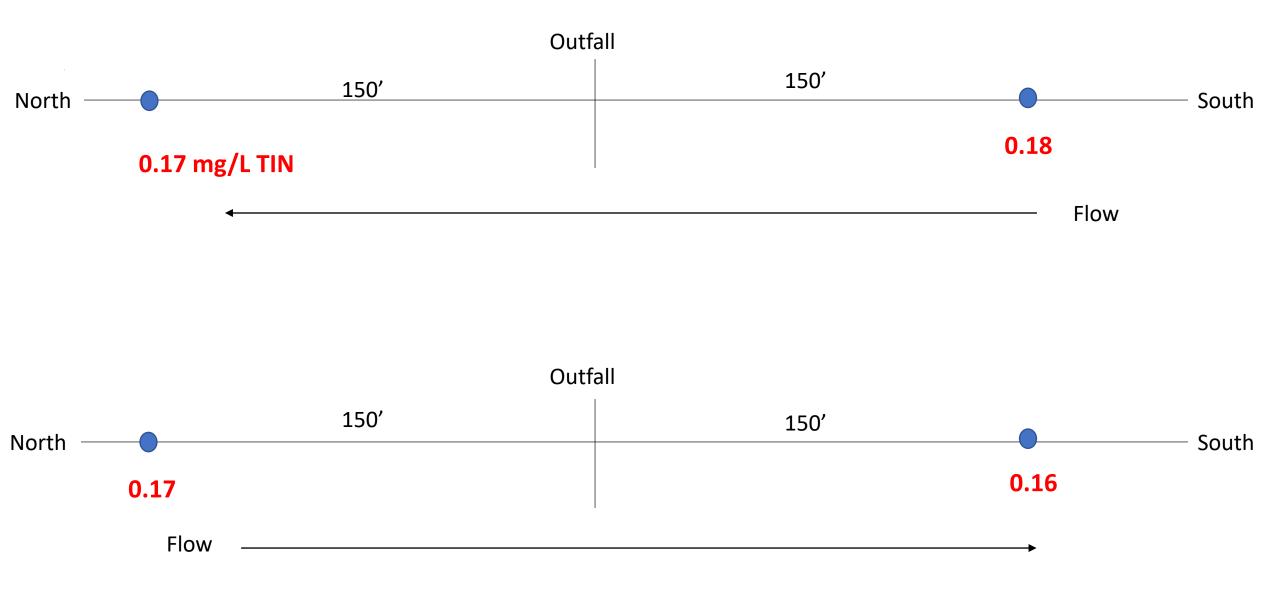
<u>Results</u>

Time	Upstream TIN mg/L	Downstream TIN mg/L
Sept. 4, 2019		
8:18 AM	0.18	0.17
12:25 PM	0.17	0.16

Discussion/Analysis

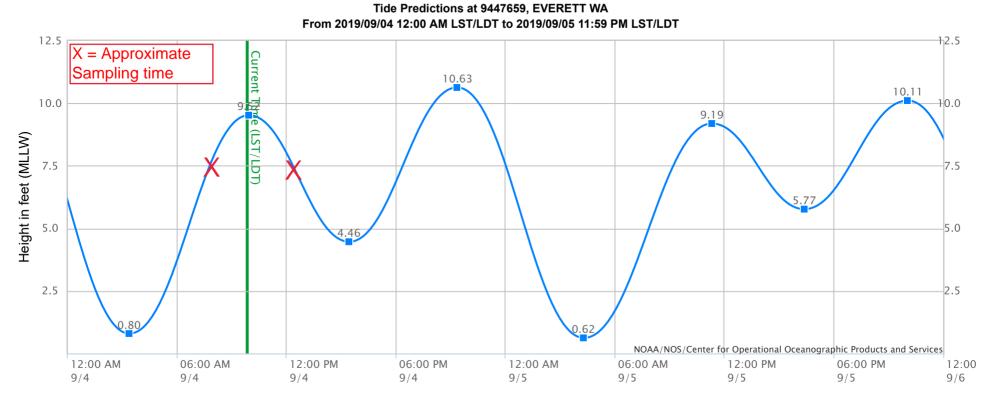
On any given day LSSD discharges roughly 2-2.5 MGD of water that has a TIN concentration of approximately 17 mg/L. It is fascinating to see that downstream measurements of TIN are less than upstream measurements in both cases. The average TIN of the four samples taken is 0.17 mg/L, 100 times less than LSSD's final effluent.

Waters of Ebey Slough flow north to the Qwuloolt Estuary, a project with goals of restoration of natural hydrologic processes and aims of sustaining salmon and wildlife. There may be some nutrient uptake by wetland plants in this area, and that could theoretically account for the waters flowing out having lower TIN than waters flowing in. In order to ensure scientific validity, an opportunity to repeat this experiment several times would be necessary.









NOAA/NOS/CO-OPS

Note: The interval is High/Low, the solid blue line depicts a curve fit between the high and low values and approximates the segments between. Disclaimer: These data are based upon the latest information available as of the date of your request, and may differ from the published tide tables.

High/Low Tide Prediction Data Listing											
Station Name: EVERETT, WA	Source: NOAA/NOS/CO-OPS										
Action: Daily	Prediction Type: Harmonic										
Product: Tide Predictions	Datum: MLLW										
Start Date & Time: 2019/9/4 12:00 AM	Height Units: Feet										
End Date & Time: 2019/9/5 11:59 PM	Time Zone: LST/LDT										

Date	Day	Time	Hgt	Time	Hgt	Time	Hgt	Time	Hgt



Burlington, WA Corporate Laboratory (a) 1620 S Walnut St - Burlington, WA 98233 - 800.755.9295 • 360.757.1400

Bellingham, WA Microbiology (b) 805 Orchard Dr Ste 4 - Bellingham, WA 98225 - 360.715.1212 Portland, OR Microbiology/Chemistry (c) 9150 SW Pioneer Ct Ste W - Wilsonville, OR 97070 - 503.682.7802

Corvallis, OR *Microbiology/Chemistry (d)* 1100 NE Circle Blvd, Ste 130 - Carvallis, OR 97330 - 541.753.4946 Bend, OR *Microbiology (e)* 20332 Empire Blvd Ste 4 - Bend, OR 97701 - 541.639.8425

October 9, 2019

Page 1 of 1

Caitlin Hubbard Lake Stevens Sewer District 1106 Vernon Rd Lake Stevens, WA 98258

RE: 19-35418 - Receiving Water Sampling

Dear Caitlin Hubbard,

Your project: Receiving Water Sampling, was received on Friday September 13, 2019.

All samples were analyzed within the accepted holding times and were appropriately preserved and analyzed according to approved analytical protocols, unless noted in the data or QC reports. The quality control data was within laboratory acceptance limits, unless specified in the data or QC reports.

If you have questions phone us at 800 755-9295.

Respectfully

Nille

Patrick Miller, MS QA Officer

Enclosures: Data Report QC Reports Chain of Custody



Burlington, WA	Corporate Laboratory (a)	1620 S Walnut St	Burlington, WA 98233	800.755.9295 • 360.757.1400
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Portland, OR	Microbiology/Chemistry (c)	9150 SW Pioneer Ct Ste W	Wilsonville, OR 97070	503.682.7802
Corvallis, OR	Microbiology (d)	540 SW Third Street	Corvallis, OR 97333	541.753.4946

October 9, 2019

Page 1 of 1

Case Narrative

Reference: 19-35418

Lab Sample ID	Sample Information	
68563	EBS-N1 - Ebey Slough	
Analytical Method	Notes	Created by
351.2	TKN: Analyst ran out of boiling stones and used boiling rods instead. Contamination expected, samples have been blank corrected. If you need a value that has not been blank corrected please contact Edge. BSP 9/26/19	BSP



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Page 1 of 2

Data Report

Client Name: Lake Stevens Sewer District 1106 Vernon Rd Lake Stevens, WA 98258 Reference Number: 19-35418 Project: Receiving Water Sampling

Report Date: 10/9/19

Date Received: 9/13/19

Approved by: bj Authorized by:

at Mille_

Patrick Miller, MS QA Officer

•	Sample Description: EBS-N1 Ebey Slough Matrix W Sample Date: 9/4/19 8:18 am Lab Number: 68563 Sample Comment: Collected By: Caitlin Hubbard											
CAS ID#	Parameter	Result	PQL	MDL	Units	DF	Method	Lab	Analyz	ed Analyst	Batch	Comment
NA	TOTAL NITROGEN	0.41	1.0		mg/L	1.0	<sum></sum>	а	9/30/19	BSP	TN_190930	
7664-41-7	AMMONIA	0.05	0.01	0.007	mg/L	1.0	350.1	а	10/7/19	BSP	350.1_191007	
E-10264	TOTAL KJELDAHL NITROGEN	0.29 BC	0.20	0.0047	mg/L	1.0	351.2	а	9/25/19	BSP	351.2_190925	
NA	TOTAL INORGANIC NITROGEN	0.17	0.01		mg/L	1.0	EDGE_TIN	а	10/9/19	BSP	TIN_191009	
E-10128	TOTAL NITRATE/NITRITE	0.12	0.010	0.004	mg/L	1.0	SM4500-NO3	Fa	9/19/19	BSP	NO3NO2_190919	

	Sample Description: EBS-S1 Ebey Slough Matrix W Sample Date: 9/4/19 8:18 am Lab Number: 68564 Sample Comment: Collected By: Caitlin Hubbard											
CAS ID#	Parameter	Result	PQL	MDL	Units	DF	Method	Lab	Analyze	ed Analyst	Batch	Comment
NA	TOTAL NITROGEN	0.35	1.0		mg/L	1.0	<sum></sum>	а	9/30/19	BSP	TN_190930	
7664-41-7	AMMONIA	0.05	0.01	0.007	mg/L	1.0	350.1	а	10/7/19	BSP	350.1_191007	
E-10264	TOTAL KJELDAHL NITROGEN	0.22 BC	0.20	0.0047	mg/L	1.0	351.2	а	9/25/19	BSP	351.2_190925	
NA	TOTAL INORGANIC NITROGEN	0.18	0.01		mg/L	1.0	EDGE_TIN	а	10/9/19	BSP	TIN_191009	
E-10128	TOTAL NITRATE/NITRITE	0.13	0.010	0.004	mg/L	1.0	SM4500-NO3	Fa	9/19/19	BSP	NO3NO2_190919	

Sample Description: EBS-N2 Ebey Slough Matrix W Sample Date: 9/4/19 12:25 pm Lab Number: 68565 Sample Comment: Collected By: Calitlin Hubbard												
CAS ID#	Parameter	Result	PQL	MDL	Units	DF	Method	Lab	Analyze	ed Analyst	Batch	Comment
NA	TOTAL NITROGEN	0.52	1.0		mg/L	1.0	<sum></sum>	а	9/30/19	BSP	TN_190930	
7664-41-7	AMMONIA	0.04	0.01	0.007	mg/L	1.0	350.1	а	10/7/19	BSP	350.1_191007	
E-10264	TOTAL KJELDAHL NITROGEN	0.39 BC	0.20	0.0047	mg/L	1.0	351.2	а	9/25/19	BSP	351.2_190925	
NA	TOTAL INORGANIC NITROGEN	0.17	0.01		mg/L	1.0	EDGE_TIN	а	10/9/19	BSP	TIN_191009	
E-10128	TOTAL NITRATE/NITRITE	0.13	0.010	0.004	mg/L	1.0	SM4500-NO3	Fa	9/19/19	BSP	NO3NO2_190919	

Notes:

ND = Not detected above the listed practical quantitation limit (PQL) or not above the Method Detection Limit (MDL), if requested.

PQL = Practical Quantitation Limit is the lowest level that can be achieved within specified limits of precision and accuracy during routine laboratory operating conditions. D.F. - Dilution Factor



Data Report

	Sample Description: EBS-S2 Ebey Slough Matrix W Sample Date: 9/4/19 12:25 pm Lab Number: 68566 Sample Comment: Collected By: Caitlin Hubbard												
CAS ID#	Parameter	Result	PQL	MDL	Units	DF	Method	Lab	Analyze	ed Analys	t Batch	Comment	
NA	TOTAL NITROGEN	0.12	1.0		mg/L	1.0	<sum></sum>	а	9/30/19	BSP	TN_190930		
7664-41-7	AMMONIA	0.04	0.01	0.007	mg/L	1.0	350.1	а	10/7/19	BSP	350.1_191007		
E-10264	TOTAL KJELDAHL NITROGEN	ND BC	0.20	0.0047	mg/L	1.0	351.2	а	9/25/19	BSP	351.2_190925		
NA	TOTAL INORGANIC NITROGEN	0.16	0.01		mg/L	1.0	EDGE_TIN	а	10/9/19	BSP	TIN_191009		
E-10128	TOTAL NITRATE/NITRITE	0.12	0.010	0.004	mg/L	1.0	SM4500-NO3	Fa	9/19/19	BSP	NO3NO2_190919		

Notes:

MD = Not detected above the listed practical quantitation limit (PQL) or not above the Method Detection Limit (MDL), if requested. PQL = Practical Quantitation Limit is the lowest level that can be achieved within specified limits of precision and accuracy during routine laboratory operating conditions. D.F. - Dilution Factor





Calibration Check

 Reference Number:
 19-35418

 Report Date:
 10/09/19

			True			%		QC QC	
Batch	Analyte	Result	Value	Units	Method	Recover	y Limits*	Qualifier Type	Comment
350.1_191007 (D AMMONIA	2.54	2.50	mg/L	350.1	102	90-110	CAL	
351.2_190925 (0 TOTAL KJELDAHL NITROGEN	2.43	2.50	mg/L	351.2	97	90-110	CAL	
NO3NO2_19091	O TOTAL NITRATE/NITRITE	2.48	2.50	mg/L	SM4500-NO3 F	99	90-110	CAL	

*Notation:

% Recovery = (Result of Analysis)/(True Value) * 100 NA = Indicates % Recovery could not be calculated.

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.

Page 1 of 5





Laboratory Fortified Blank

Reference Number: **19-35418** Report Date: 10/09/19

			True			%	QC QC	
Batch	Analyte	Result	Value	Units	Method	Recovery Limit	s* Qualifier Type	Comment
351.2_190925	0 TOTAL KJELDAHL NITROGEN	2.10	2.00	mg/L	351.2	105 90-1 [°]	0 LFB	

*Notation:

% Recovery = (Result of Analysis)/(True Value) * 100 NA = Indicates % Recovery could not be calculated.

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.





Laboratory Reagent Blank

Reference Number: **19-35418** Report Date: 10/09/19

			True			%	QC QC	
Batch	Analyte	Result	Value	Units	Method	Recovery Limits*	Qualifier Type	Comment
350.1_191007	0 AMMONIA	ND		mg/L	350.1	0-0	LRB	
351.2_190925	0 TOTAL KJELDAHL NITROGEN	ND		mg/L	351.2	0-0	LRB	

*Notation:

% Recovery = (Result of Analysis)/(True Value) * 100 NA = Indicates % Recovery could not be calculated.

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.

Page 3 of 5





Method Blank

 Reference Number:
 19-35418

 Report Date:
 10/09/19

			True			%	QC QC	
Batch	Analyte	Result	Value	Units	Method	Recovery Limits*	Qualifier Type	Comment
350.1_191007 0	AMMONIA	ND		mg/L	350.1	0-0	MB	
351.2_190925 0	TOTAL KJELDAHL NITROGEN	ND		mg/L	351.2	0-0	MB	
NO3NO2_19091§ 0	TOTAL NITRATE/NITRITE	ND		mg/L	SM4500-NO3 F	0-0	MB	

*Notation:

% Recovery = (Result of Analysis)/(True Value) * 100 NA = Indicates % Recovery could not be calculated.

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Page 4 of 5





Quality Control Sample

Reference Number: **19-35418** Report Date: 10/09/19

			True			%		QC	QC	
Batch Analyte		Result	Value	Units	Method	Recovery	Limits*	Qualifier	Туре	Comment
350.1_191007 0 AMMONIA	N N	4.15	4.00	mg/L	350.1	104	85-115		QCS	
351.2_190925 0 TOTAL KJ	ELDAHL NITROGEN	2.67	2.78	mg/L	351.2	96	85-115		QCS	
NO3NO2_19091{ 0 TOTAL NI	TRATE/NITRITE	1.00	1.00	mg/L	SM4500-NO3 F	100	90-110		QCS	

*Notation:

% Recovery = (Result of Analysis)/(True Value) * 100 NA = Indicates % Recovery could not be calculated.

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Page 5 of 5



Page 1 of 2

SAMPLE DEPENDENT QUALITY CONTROL REPORT

Duplicate, Matrix Spike/Matrix Spike Duplicate and Confirmation Result Report

			Duplicate				QC	
Batch	Sample Analyte	Result	Result	Units	%RPD	Limits	Qualifier Type	e Comments
Duplicate								
350.1_191007								
	70315 AMMONIA	1.20	1.19	mg/L	0.8	0-20	DUI	þ
	70782 AMMONIA	0.16	0.16	mg/L	0.0	0-20	DUI	þ
	71279 AMMONIA	0.52	0.52	mg/L	0.0	0-20	DUI	þ
351.2_190925								
	67942 TOTAL KJELDAHL NITROGEN	0.53	0.84	mg/L	45.3	0-20	DUI	0
	68596 TOTAL KJELDAHL NITROGEN	ND	ND	mg/L	NA	0-20	DUI	0
NO3NO2_1909	19							
_	66596 TOTAL NITRATE/NITRITE	0.26	0.26	mg/L	0.0	0-20	DUI	0
	66604 TOTAL NITRATE/NITRITE	0.27	0.27	mg/L	0.0	0-20	DUI	0
	67943 TOTAL NITRATE/NITRITE	1.03	1.02	mg/L	1.0	0-20	DUI	0
	68599 TOTAL NITRATE/NITRITE	0.15	0.16	mg/L	6.5	0-20	DUI	0

[%]RPD = Relative Percent Difference

NA = Indicates %RPD could not be calculated

Matrix Spike (MS)/Matrix Spike Duplicate (MSD) analyses are used to determine the accuracy (MS) and precision (MSD) of a analytical method in a given sample matrix. Therefore, the usefulness of this report is limited to samples of similar matrices analyzed in the same analytical batch.

Only Duplicate sample with detections are listed in this report

Limits are intended for water matrices only. These criteria are for guidance only when reported with soils/solids.



			Duplicate	Duplicate										
			Spike	Spike	Spike		Percer	nt Recovery				QC		
Batch	Sample Analyte	Result	Result	Result	Conc	Units	MS	MSD	Limits*	%RPD	Limits*	Qualifier	Туре	Comments
Labora	tory Fortified Matrix (MS)													
350.1_1910	007													
	70315 AMMONIA	1.20	2.16	2.18	1.00	mg/L	96	98	70-130	2.1	0-20		LFM	
	70782 AMMONIA	0.16	1.15	1.15	1.00	mg/L	99	99	70-130	0.0	0-20		LFM	
	71279 AMMONIA	0.52	1.55	1.56	1.00	mg/L	103	104	70-130	1.0	0-20		LFM	
351.2_1909	925													
	67942 TOTAL KJELDAHL NITROGEN	0.53	2.23		2.00	mg/L	85		70-130	NA	0-20		LFM	
	68596 TOTAL KJELDAHL NITROGEN	ND	2.41		2.00	mg/L	121		70-130	NA	0-20		LFM	
NO3NO2_1	190919													
	66596 TOTAL NITRATE/NITRITE	0.26	1.31	1.29	1.00	mg/L	105	103	80-120	1.9	0-20		LFM	
	66604 TOTAL NITRATE/NITRITE	0.27	1.25	1.26	1.00	mg/L	98	99	80-120	1.0	0-20		LFM	
	67943 TOTAL NITRATE/NITRITE	1.03	2.05	2.06	1.00	mg/L	102	103	80-120	1.0	0-20		LFM	
	68599 TOTAL NITRATE/NITRITE	0.15	1.18	1.18	1.00	mg/L	103	103	80-120	0.0	0-20		LFM	

%RPD = Relative Percent Difference

NA = Indicates %RPD could not be calculated

Matrix Spike (MS)/Matrix Spike Duplicate (MSD) analyses are used to determine the accuracy (MS) and precision (MSD) of a analytical method in a given sample matrix. Therefore, the usefulness of this report is limited to samples of similar matrices analyzed in the same analytical batch.

Only Duplicate sample with detections are listed in this report

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Page 1 of 1

Qualifier Definitions

Reference Number: 19-35418 Report Date: 10/09/19

Qualifier	Definition
BC	Indicates that the result was blank corrected.

Note: Some qualifier definitions found on this page may pertain to results or QC data which are not printed with this report.

Field Notes

Date Time	
914/2019	sample event #1: 8:18 Am : tide going in
	Sample event # 2: 12:26 PM : fide going out
	Sample event a signification
Weather	
Field Representative	#1: Overcast, 60°, Caitlin + Amy
	#2: Partly Cloudy, 65°, Caitlin + Ron
Location	
	Approximately 150' upstream + downstream
	of LSSD outfall into Ebey Slough
	of checked with construction
Description	
Description	0700 mobilize equipment to blue Subarn:
	dead battery. Mob. to Amujs car. Stop at
	plant for extra sample bottle - bottle un -
	available. Arrive at boat 0745, load gear
	in + set out for L3SD out fall. 0818
	gather samples appx 150' North # 150'
	South of Outfall. Description of waters:
	lots of debris, partially sunk boats (6 of
<	rhem). Jaw 3 harbor seals. Stopped boat
	twice because of sticks in the propeller. Hade
	it back to dock at 0915. Head back to office.
	1130 mobilize back to dock. Arrive at dock
	at 12:00 \$ set out for LSSD out fall. 1225
	arrive at sampling location & gather
	samples at approximately same locations.
	Place samples in cooler, head back to the
	dock. Arrive at dock at 1'00 & head back to
	office.
	- 1

C	HAIN OF CU	STODY		YSIS	REQ	UEST	(PLEASI						un vol	CI		10	PAGE_			
CHAIN OF CUSTODY / ANALYSIS REQUEST (PLEASE OF Report To: Lake Stevens Sewer District Billing Email: accounts payable									stowns	FOR LAB USE							TAGE_	UF		
Address: Nole Veinon Road Ste A Bill To: Lake Stevens								seur	ering						ANALYTICAL					
Cit	y: Lake Stevens	State: WA	Zip: 982	58 Add	ress //	06 Ver	non Ro	d sto	r a			ATORY PR	0000	162	Mai 0 South W	in Lab Valnut S	(800-755-929) St. Burlington,	5) WA 98233		
Att	m: Caitlin Hu	ibbard				stevens		UA Zip: 4		-11		ing Water A			Micro	biolog	ite 4 Bellingha	12)		
Ph	one: 425-309-400	85 Fax:				.334.85			100-50		Clean Wat		NO1		Portla	and La	b (503-682-78	02)		
Re	port Email: Chubbar	delkster	venssewer.	and Card	d: VIS			pires:			RCRA / CI			9150 5	Corva	Illis La	uite W Wilsonv	46)		
Pro	oject Name: Receiv	ing Water	Sampli	Card							Other				540 SW :	3rd St.	Corvallis, OR (541-639-842)	97333		
	the second s			21_											32 Empire	Ave. S	Suite F4 Bend,	0R 97703		
2. De specific in test requests. 3. List each metal individually. 4. Check off analysis to be performed for each sample location. 5. Enter number of containers.					lard Time (50 est (1009	 Required Surcharg Surcharge hone Call Re 	Phone Cal	Req.	DTAL ORDANIC TROGEN		Analy	sis Rec	lueste	d		Number Of Containers				
	Sample ID	Lo	ocation	Sec.	ample fatrix Below)	Grab or Composite	Date	Time	TOTAL INURAL							Numbe	Special	Instruction/		
1	EB5-N1	Ebey 51	lough	V	J	6	9.4.19	0818	X		П	1 [7]				<u> </u>	Condition	is on Receipt		
2	EBS-51	"	14		1	11	11	0818	X											
3	EBS-N2	71	<i>n</i>		,	H	н -	1225	X											
4	EBS-52	K	"	-		h	n	1225	X											
5 6																-				
7																				
8																-				
9																				
10																				
Sar	npled By: Caitlin	n Hubba	urd	Pho	ne: 47	15-309-4	10.00	Fax:												
	e Receipt requested (Mus) * San W-v	nple Ma	trix Si	W - Surface W - Ground	Water V	VW - Waste)L - Oil)ther	Email: e	hubba		erg	4	 ■ Total Co 	ntainers Yes No N		
elin	quished By		Date	Time	Barri				T						Seals Intac		ω			
~	eitlin Hubbo	ell	9.13.19		Receive	ed By	1	lus		ate Stî	Time 225			Evidence	emp <u>10.</u> Of Cooling	g	Satisfactory			
	4														Received		ls Agree			