

NAMMO DEFENSE SYSTEMS INC

October 14, 2024

Jocelyn Clark, P.E., Civil/Environmental Engineer
 Land, Chemicals and Redevelopment Division, RCRA Branch
 United States Environmental Protection Agency, Region 9
 75 Hawthorne Street, LND-4-2
 San Francisco, California 94105

VIA ELECTRONIC MAIL

**Re: Third Quarter 2024 Progress Report, Nammo Defense Systems Inc. Facility
 Mesa, Arizona**

Dear Ms. Clark:

Pursuant with Paragraph 34 of the Administrative Order on Consent between Nammo Defense Systems Inc. (NDS) and the United States Environmental Protection Agency Region 9 (EPA) effective 9 February 2021, this report submittal includes a summary of the activities completed during the third quarter (Q3) 2024.

CONTACT INFORMATION AND CHANGES IN PROJECT PERSONNEL

Contact Name and Position	Contact Information	Changes
Jocelyn Clark, EPA, Special Projects Coordinator	Clark.jocelyn@EPA.gov (415) 972-3324	No change
Matthew Trask, NDS, Director, Ethics and Compliance	Mtrask@Nammo.us (480) 898-2495	No change
Carole Thompson, NDS, Communications Manager	Cthompson@Nammo.us (480) 898-2565	No change
Kate Blatchford, NDS, Environmental Remediation Manager	Kblatchford@Nammo.us (480) 490-8911	No change

Fabrizio Mascioni, Geosyntec Consultants, Project Manager	Fmascioni@Geosyntec.com (602) 513-5816	No change
Isaac Roll, Geosyntec Consultants, Senior Engineer	Iroll@Geosyntec.com (602) 513-5829	No change

SIGNIFICANT ACTIVITIES DURING REPORTING PERIOD

Meetings

- Biweekly meetings were conducted between EPA, Arizona Department of Environmental Quality (ADEQ), NDS, and its consultants including Geosyntec, related to the Consent Order Project, except July 4th for the holiday, and September 12, when the EPA was unavailable.
- Monthly meetings were conducted with ADEQ, NDS, and its consultants related to the Voluntary Remediation Program Project.

NDS Communications

- Revised CRP Document submitted to EPA on 9/10/24 (original submission 8/3/23).

Consent Order Project

Deliverables:

- Alternative groundwater sampling contractor Quality Management Plan submitted 8/14/24.
- Second Quarter 2024 Groundwater Monitoring Report, Former TTU, Nammo Defense Systems Inc., Mesa, Arizona submitted 8/27/24.
- Second Quarter 2024 Former TTU Interim Remedial Action (IRA) Report Nammo submitted 8/27/24.
- Second Quarter TTU GIS and Laboratory Database Package submitted 9/11/24.

Field Activities:

- TTU Evaporator carbon pretreatment pilot test completed 8/19/24 through 8/22/24.
- Q3 2024 groundwater sampling was conducted from 8/26/24 through 8/28/24.

Notable Analytical Results:

Perchlorate concentrations at well TTU-6 were observed at 309 micrograms per liter (ug/l). Historically, concentrations of perchlorate from the past three sampling events were under 20 ug/l. Since this concentration exceeds an order of magnitude from the past three events, the well was immediately resampled on 9/24/24. Perchlorate was observed in the resample at a concentration of 246 ug/l. Per the Contingency Plan for Groundwater Contamination Limit Exceedance at Primate Facility Well No. 2 (Geosyntec, 2023) NDS will have well TTU-6 sampled monthly for three months starting in October.

Results from the Washington National Primate Research Center well PF-2, located on Salt River Pima-Maricopa Indian Community (SRPMIC) property, did not exceed the site-specific perchlorate concentration limit of 6.4 µg/l or the trigger level (TL) of 3.2 µg/l.

Remediation Systems Update:

Evaporator Unit

- During Q2 the evaporator system processed approximately 21,080 gallons of water.
- Approximately 2,150 gallons of water was collected from the wells by NDS and sent for offsite disposal due to evaporator being down prior to the well evacuation event. A copy of Evaporator Interim Remedial Action (IRA) System O&M Form, manifests, and the waste profile are provided in **Attachment A**.
- The pumping wells were shut off on 7/12/24 through 7/15/24 due to a power outage.
- On 7/22/24 the system was shut down due to a pump malfunction, however it was restored on the same day.
- From 8/19/24 through 8/22/24, Geosyntec performed a carbon pretreatment pilot test using the well water that is usually processed in the evaporator.
- Water used in the carbon pretreatment pilot test was processed through the evaporator system starting on 8/22/24.
- From 8/30/24 through 9/5/24 the system was down due to a malfunctioning of the level sensor.

Action Items for Next Reporting Period:

- Submittal of Q3 2024 Former TTU Groundwater Monitoring Report 60 days from end of quarter (11/30/24).
- Completion of Q4 2024 groundwater sampling (proposed November 2024).
- Submittal of a GIS and Laboratory Database package including Q3 2024 groundwater monitoring data (11/30/24).
- Complete and evaluate results for Carbon Pretreatment Pilot Test for TTU Evaporator System.

Plant 3 and Former Water Bore Out (WBO) Project

Deliverables:

- Semiannual (Q1, Q2) 2024 Groundwater Monitoring Report, Former WBO, Nammo Defense Systems Inc., Mesa, Arizona submitted 8/27/24.
- Semiannual (Q1, Q2) 2024 Former WBO Fluidized Bed Reactor (FBR) Interim Remedial Action (IRA) Report submitted 8/27/24.
- Semiannual (Q1, Q2) 2024 Former WBO Soil Vapor Extraction (SVE) Interim Remedial Action (IRA) Report submitted 8/27/24.
- Second Quarter WBO GIS and Laboratory Database Package submitted 9/11/24.
- NT-21 and NT-22 permitting submitted to City of Mesa with traffic control plans.

Field Activities:

- Q3 2024 groundwater sampling was conducted from 8/26/24 through 8/28/24.

Notable Analytical Results:

- Q3 2024 Groundwater Monitoring- Concentrations of perchlorate were observed at NT-5 slightly increased in concentrations (14,800 ug/l) from the previous sampling event.

Action Items for Next Reporting Period:

- Completion of Q3 2024 quarterly sampling (proposed November 2024).
- Pull pump from FBR extraction well EXT-2 for evaluation.
- Permitting and Installation of shallow wells NT-21 and NT-22.

Remediation System Updates:

Hydraulic Containment FBR System

Between 7/1/24 and 9/30/24, the FBR system operated continuously at an average flow rate of approximately 340 gallons per minute, pumping exclusively during this time period from EXT-1. Approximately 107.3 pounds of perchlorate was removed during Q2 operation.

FBR-230 was offline from 6/6/24 through 7/11/24, when the recirculation pump was re-installed. Both FBRs experienced down time due to a power outage from 7/27/24 through 7/29/24 and between 8/3/24 and 8/5/24 due to a low voltage alarm at EXT-1, believed to be related to a separate power loss event. FBR-230 experienced approximately 3 days of downtime between 9/16 and 9/19 while the recirculation pump was pulled for repairs, and approximately 3 days of downtime from 9/28 to 9/30 due to a phosphoric acid check valve malfunction.

In late September Weber Water Resources was onsite and confirmed that the pump in well EXT-2 was not functioning. NDS plans to pull the pump from EXT-2 and evaluate it for repair or replacement as soon as possible.

Soil Vapor Extraction System (Plant 3)

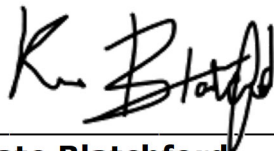
The system has run continually since May 2024, totaling approximately 3,042.9 run hours since start up with an average flow rate of 123 cubic feet per minute (cfm) from well SVE-01 for Q3. Influent concentrations of 1,1-DCE averaged 133 ug/l and a total of approximately 264.9 pounds of 1,1-DCE have been removed to date. Influent concentrations of TCE averaged 177.33 ug/l and a total of approximately 347.8 pounds of TCE have been removed to date.

If you have any questions about this report, please contact Matthew Trask at Mtrask@Nammo.us or at 480.898.2495.

Sincerely,

NAMMO DEFENSE SYSTEMS INC.

By:



Kate Blatchford
Environmental Remediation Manager

ATTACHMENT A

Wastewater Manifests
Evaporator IRA System O&M Form
Wastewater Profile



LIQUID ENVIRONMENTAL SOLUTIONS

NON-HAZARDOUS WASTE MANIFEST

214979

Profile Number

213910

TTL Well Water 50-36486 D659644

Generator Name	Name: <u>Nanimo Defense Systems</u>	Generator Address	Address: <u>4111 N Higley Rd</u>
	Phone: <u>(415) 613-4039</u>		City: <u>Mesa</u> State: <u>AZ</u> Zip: <u>85215</u>

Check with your state and local regulatory agencies for manifest retention requirements. NOTE: Many regulatory agencies require records to be kept on-site and available to review for up to 3 years.

Waste Type	<input type="checkbox"/> Grease Trap <input type="checkbox"/> Grit Trap <input type="checkbox"/> Septic/Chemical Toilet <input type="checkbox"/> Non-Industrial <input type="checkbox"/> Industrial <input type="checkbox"/> Special
	<input type="checkbox"/> Used Cooking Oil <input type="checkbox"/> Recyclable Used Oil

I certify that the waste material removed from the above premises does not contain any radioactive, flammable, explosive, toxic or hazardous material ("Excluded Waste"). The term "hazardous material" is defined as any one or more pollutant, toxic substance, hazardous substance, solvent or oil as defined in or pursuant to the Resource Conservation and Recovery Act, the Comprehensive Environmental Response Compensation and Liability Act, the Federal Clean Water Act, or any other federal, state or local environmental law, regulation, ordinance, or rule, whether existing as of the date of this agreement or subsequently enacted. I also acknowledge that the Generator shall be responsible for any costs incurred by the Transporter or Disposal Facility in handling or proper disposal of any hazardous waste and that the Generator expressly agrees to defend, indemnify and hold harmless the Transporter from and against any and all damages, costs, fines and liabilities resulting from or arising out of any such hazardous waste.

Generator Rep. Name (please print)	<u>David Veroyes I</u>	Generator Rep. Signature	<u>David Veroyes I</u>
--	------------------------	---------------------------------	------------------------

Transporter Name	Name: <u>Advanced Chemical Transport</u>	Transporter Address	Address: <u>1211 Eike Drive</u>
	Phone: <u>(408) 548-5050</u>		City: <u>Summerville</u> State: <u>GA</u> Zip: <u>31489</u>

Waste Removed (Gallons)	<u>2150</u>	Date	<u>4/5/24</u>	Time	<u>9:40 am</u>
--------------------------------	-------------	-------------	---------------	-------------	----------------

I certify that the information above is accurate, and that only the waste certified for removal by the Generator is contained in the servicing vehicle. I am aware that falsification of this manifest may result in prosecution.

Driver Name (please print)		Driver Signature	
--------------------------------------	--	-------------------------	--

Disposal Facility	<u>Liquid Environmental Solutions of Arizona</u>	Address	<u>5159 West Van Buren Street Phoenix, AZ 85043</u>
--------------------------	--	----------------	---

Waste Received (Gallons)		Date		Time	
---------------------------------	--	-------------	--	-------------	--

Facility Rep. Name (please print)		Facility Rep. Signature	
---	--	--------------------------------	--

WHITE - Generator Final Copy YELLOW - Liquid Environmental Solutions Copy GOLDENROD - Transporter Copy PINK - Generator 1st Copy

EVAPORATOR IRA SYSTEM O&M FORM

DATE: 9/2/2024	INSPECTOR: David Venegas
----------------	--------------------------

EXTRACTION WELL	VOL. ON ARRIVAL (GAL)	VOL. REMAINING (GAL)	VOL. EXTRACTED (GAL)
TTU-1	1000	0	1000
TTU-2	1000	0	1000
TTU-20			

Tank Level Info: Multiply tank level by 1,000 to calculate gallons (example: 0.125 x 1000= 125)
 1/8= 125 GAL | 1/4= 250 GAL | 3/8= 375 GAL | 1/2= 500 GAL | 5/8 = 625 GAL | 3/4 = 750 GAL | 7/8 = 875 GAL | 1= 1,000 GAL

CYCLE TIME:	FILTER CHANGE?	Y/N	
EVAPORATOR WELL WATER TANK	VOL. ON ARRIVAL (GAL)	VOL. DELIVERED (GAL)	VOL. IN TANK (GAL)
	1050	950	2000

Tank Level Info: Multiply tank level by 3,000 to calculate gallons (example: 0.125 x 3000= 375)
 0.125= 375 GAL | 0.250= 750 GAL | 0.375= 1125 GAL | 0.500= 1500 GAL | 0.625= 1,875 GAL | 0.750= 2,000 GAL | 0.875 = 2,625 GAL | 1= 3,000 GAL

RESIDUE WATER TANK	VOL. IN TANK (GAL)	VOL. PUMPED FROM EVAPORATOR (GAL)	VOL. REMAINING IN TANK (GAL)	VOL. IN EVAP PAN (GAL)	VOL. PUMPED INTO EVAP PAN (GAL)	VOL. REMOVED FROM EVAP PAN (GAL)	VOL. REMAINIG IN EVAP PAN (GAL)

Tank Level Info: Multiply tank level by 500 to calculate gallons (example: 0.125 x 500= 63)
 1/8= 63 GAL | 1/4= 125 GAL | 3/8= 190 GAL | 1/2= 250 GAL | 5/8 = 315 GAL | 3/4 = 375 GAL | 7/8 = 440 GAL | 1= 500 GAL

COMMENTS: Pumped remaining totes into holding tanks which totals 950 gallons. 9/5 well were extracted and shipped offsite.



UNIFORM WASTE PROFILE
866-694-7327
www.liquidenviro.com

Internal Use Only:
Profile #: 213911
Account #:
Approved [] Non-Approved []
Subcategory A [] B [] C []
Waste Code

PROFILE INFORMATION

US EPA ID#: AZD020132502 State ID#: NAICS # 332993 TCEQ ID#(TX-Only): Analytical Attached MSDS Attached

GENERATOR INFORMATION

Name: NAMMO DEFENSE SYSTEMS INC
Address: 4111 N HIGLEY ROAD
City: MESA State: AZ Zip: 85215
Contact: Antonio Curiale Title: Main Contact
Phone: (480)898-2261 Fax:
Email: acuriale@nammo.us

BILLING INFORMATION

Name: ACTENVIRO
Address: 6212 S 75th Ave #4
City: Laveen State: AZ Zip: 85339
Contact: Cindy Duncan Title: Project Manager
Phone: (602)509-9591 Fax:
Email: cduncan@actenviro.com and scokeley@actenviro.com

WASTE QUESTIONNAIRE (CHECK ALL THAT APPLY)

Non-hazardous Waste
1. Is this material a hazardous waste (F, K, U, or P listed) as defined by 40 CFR 261 Subpart D?
2. Has this material been mixed with a hazardous waste as defined by 40 CFR 261?
3. Does this material exhibit any of the following hazardous waste characteristics?
4. Does this material contain?
5. Is the waste derived from an underground storage tank (UST)?
6. If waste is derived from fuel, is the fuel leaded?
Used Oil (as defined by CFR 279.1)
1. Is this material Used Oil as defined by 40 CFR 279?
2. Has this Used Oil been mixed with hazardous waste?
3. Is the source of the waste a Conditionally Exempt Small Quantity Generator?
4. Does this Used Oil contain chlorinated paraffins? If yes, attach MSDS
5. Does this Used Oil contain TSCA (40 CFR 761) regulated levels of PCB?
6. Does this Used Oil contain less (<) than or equal to 1,000 mg/L Total Organic Halogens (TOX)?
7. Is this Used Oil soluble in water?

WASTE STREAM COMPOSITION (TOTAL MUST EQUAL 100%)

Table with columns: Major Components, Concentration, Range. Row: Well Water, Average 100, Minimum 100, Maximum.

WASTE DESCRIPTION

Common Name of Waste: TTU-1 Well water
Detail onsite remediation process
Process Generating Waste:
(Add additional sheet if necessary)

Physical State: 100% Liquid With No Solids
Layers: Single Phase
pH: 2-6
Flash Point: 73-100 F
Specific Gravity: Range: To:
Color: Describe Colorless
Odor: None
Viscosity: Low
TX-Only Classification: Class I

TX-ONLY: PLEASE INDICATE WHETHER ANY OF THE FOLLOWING ARE PRESENT:

TCLP Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium and Silver
TCLP Semivolatiles: (o-Cresol, m-Cresol, p-Cresol, Cresol (total) 2-4 Dinitrotoluene, Hexachlorobenzene, Hexachlorobutadiene, Hexachloroethane, Nitrobenzene, Pentachlorophenol, Pyridine, 2-4-5 Trichlorophenol, and 2-4-6 Trichlorophenol)
TCEQ Appendix 1: (TAC 31, Section 335-Subchapter R) or Total Petroleum Table 1, Constituents Hydrocarbons
TCLP Herbicides/Pesticides: (Chlordane, 2-4 Endrin, Heptachlor, Heptachlor epoxide, Lindane, Methoxychlor, Toxaphene, and 2-4-5 TP/Sivex)
TCLP Volatiles: (Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroform, Methyl Ethyl Kelone, 1-4 Dichlorobenzene, 1-2 Dichloroethane, 1-1 Dichloroethylene, Trichloroethylene, Tetrachloroethylene, and Vinyl Chloride)
RCI: (Reactive Cyanide, Reactive Sulfide, Corrosivity, Ignitability)

TRANSPORTATION INFORMATION

Method of Shipment: Bulk Liquid
Shipment Frequency: Quarterly
Anticipated Volume:

GENERATOR CERTIFICATION AND GUARANTEE - PLEASE READ AND SIGN BELOW

As the generator of the material (waste) described above, I certify that I have provided all relevant information as required by this profile and that the information provided is, to the best of my knowledge and belief, true, accurate and complete. Generator agrees not to deliver or arrange for delivery of any material that does not conform to the waste characterization contained in this profile. I further certify that this material is not a RCRA hazardous waste pursuant to federal, state or local laws and has not been mixed with any chlorinated solvents or any other contaminants including, without limitation, PCBs, pesticides, or other hazardous wastes. If Liquid Environmental Solutions (LES) accepts the material for processing and the material is later determined by LES or any other person to be or contain hazardous waste within the meaning of any federal, state or local law, or contain PCBs in sufficient quantity to render it a TSCA-regulated material, the generator agrees to pay all costs incurred by LES to properly treat, store, dispose or otherwise handle the material and any fines and penalties resulting from LES's handling of generator's material. Generator agrees to promptly notify LES of any change in the composition of the material or process generating the material, and agrees to provide LES with a new Uniform Waste Profile prior to delivering any material to LES that does not conform to the waste characterization contained in this profile. The undersigned is an authorized representative of the generator.

Antonio Curiale
Generator Authorization Signature
Date 7/11/2024
Print Name and Title Antonio Curiale Environmental Supervisor
LES Rev: 8-18-15



UNIFORM WASTE PROFILE
866-694-7327
www.liquidenviro.com

Internal Use Only:
Profile #: 213912
Account #:
Approved [] Non-Approved []
Subcategory A [] B [] C []
Waste Code

PROFILE INFORMATION

US EPA ID#: AZD020132502 State ID#: NAICS # 332993 TCEQ ID#(TX-Only): Analytical Attached MSDS Attached

GENERATOR INFORMATION

Name: NAMMO DEFENSE SYSTEMS INC
Address: 4111 N HIGLEY ROAD
City: MESA State: AZ Zip: 85215
Contact: Antonio Curiale Title: Main Contact
Phone: (480)898-2261 Fax:
Email: acuriale@nammo.us

BILLING INFORMATION

Name: ACTENVIRO
Address: 6212 S 75th Ave #4
City: Laveen State: AZ Zip: 85339
Contact: Cindy Duncan Title: Project Manager
Phone: (602)509-9591 Fax:
Email: cduncan@actenviro.com and scokey@actenviro.com

WASTE QUESTIONNAIRE (CHECK ALL THAT APPLY)

Non-hazardous Waste
1. Is this material a hazardous waste (F, K, U, or P listed) as defined by 40 CFR 261 Subpart D?
2. Has this material been mixed with a hazardous waste as defined by 40 CFR 261.2?
3. Does this material exhibit any of the following hazardous waste characteristics?
4. Does this material contain?
5. Is the waste derived from an underground storage tank (UST)?
6. If waste is derived from fuel, is the fuel leaded?
Used Oil (as defined by CFR 279.1)
1. Is this material Used Oil as defined by 40 CFR 279?
2. Has this Used Oil been mixed with hazardous waste?
3. Is the source of the waste a Conditionally Exempt Small Quantity Generator?
4. Does this Used Oil contain chlorinated paraffins? If yes, attach MSDS
5. Does this Used Oil contain TSCA (40 CFR 761) regulated levels of PCB?
6. Does this Used Oil contain less than or equal to 1,000 mg/L Total Organic Halogens (TOX)? * If no, rebuttal per 40 CFR 279.10(b)(1)(ii) must be included.
7. Is this Used Oil soluble in water?

WASTE STREAM COMPOSITION (TOTAL MUST EQUAL 100%)

Table with columns: Major Components, Concentration Range, Average, Minimum, Maximum. Row: Well Water, 100, 100.

WASTE DESCRIPTION

Common Name of Waste: TTU-2 Well water
Detail: onsite remediation process
Process Generating Waste:
(Add additional sheet if necessary)

Physical State: 100% Liquid With No Solids
Layers: Single Phase
pH: 2-6
Flash Point: 73-100 F
Specific Gravity: Range: To:
Color: Describe Colorless
TX-Only Classification: Class I

TX-ONLY: PLEASE INDICATE WHETHER ANY OF THE FOLLOWING ARE PRESENT:

TCLP Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium and Silver
TCLP Semivolatiles: (o-Cresol, m-Cresol, p-Cresol, Cresol (total) 2,4-Dinitrotoluene, Hexachlorobenzene, Hexachlorobutadiene, Hexachloroethane, Nitrobenzene, Pentachlorophenol, Pyridine, 2,4-5 Trichlorophenol, and 2,4-6 Trichlorophenol)
TCEQ Appendix 1: (TAC 31, Section 335-Subchapter R) or Total Petroleum Table 1, Constituents Hydrocarbons

TRANSPORTATION INFORMATION

Method of Shipment: Bulk Liquid
Shipment Frequency: Quarterly
Anticipated Volume:

GENERATOR CERTIFICATION AND GUARANTEE - PLEASE READ AND SIGN BELOW

As the generator of the material (waste) described above, I certify that I have provided all relevant information as required by this profile and that the information provided is, to the best of my knowledge and belief, true, accurate and complete. Generator agrees not to deliver or arrange for delivery of any material that does not conform to the waste characterization contained in this profile. I further certify that this material is not a RCRA hazardous waste pursuant to federal, state or local laws and has not been mixed with any chlorinated solvents or any other contaminants including, without limitation, PCBs, pesticides, or other hazardous wastes. If Liquid Environmental Solutions (LES) accepts the material for processing and the material is later determined by LES or any other person to be or contain hazardous waste within the meaning of any federal, state or local law, or contain PCBs in sufficient quantity to render it a TSCA-regulated material, the generator agrees to pay all costs incurred by LES to properly treat, store, dispose or otherwise handle the material and any fines and penalties resulting from LES's handling of generator's material. Generator agrees to promptly notify LES of any change in the composition of the material or process generating the material, and agrees to provide LES with a new Uniform Waste Profile prior to delivering any material to LES that does not conform to the waste characterization contained in this profile. The undersigned is an authorized representative of the generator.

Signature: Antonio Curiale
Date: 7/11/2024
Print Name and Title: Antonio Curiale Environmental Supervisor
LES Rev: 8-18-15



UNIFORM WASTE PROFILE
866-694-7327
www.liquidenviro.com

Internal Use Only:	
Profile #:	213913
Account #:	
Approved	<input type="radio"/> Non-Approved <input type="radio"/>
Subcategory	A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>
Waste Code	

PROFILE INFORMATION

US EPA ID#: AZD020132502 State ID#: NAICS # 332993 TCEQ ID#(TX-Only): Analytical Attached MSDS Attached

GENERATOR INFORMATION

Name: NAMMO DEFENSE SYSTEMS INC
Address: 4111 N HIGLEY ROAD
City: MESA State: AZ Zip: 85215
Contact: Antonio Curiale Title: Main Contact
Phone: (480)898-2261 Fax:
Email: acuriale@nammo.us

BILLING INFORMATION

Name: ACTENVIRO
Address: 6212 S 75th Ave #4
City: Laveen State: AZ Zip: 85339
Contact: Cindy Duncan Title: Project Manager
Phone: (602)509-9591 Fax:
Email: cduncan@actenviro.com and scookely@actenviro.com

WASTE QUESTIONNAIRE (CHECK ALL THAT APPLY)

Non-hazardous Waste

1. Is this material a hazardous waste (F, K, U, or P listed) as defined by 40 CFR 261 Subpart D? Yes No Unknown
If yes to the above, identify the listing.

2. Has this material been mixed with a hazardous waste as defined by 40 CFR 261? Yes No Unknown

3. Does this material exhibit any of the following hazardous waste characteristics?
 Ignitability? (40 CFR Part 261.21) Yes No Unknown
 Corrosivity? (40 CFR Part 261.21) Yes No Unknown
 Reactivity? (40 CFR Part 261.21) Yes No Unknown
 Toxicity? (40 CFR Part 261.21) Yes No Unknown

4. Does this material contain?
 Herbicides, pesticides, insecticides? Yes No Unknown
 Dioxins? Yes No Unknown
 Radioactive substances? Yes No Unknown
 Domestic Wastes? Yes No Unknown
 Biohazardous materials? Yes No Unknown

5. Is the waste derived from an underground storage tank (UST)? Yes No Unknown

6. If waste is derived from fuel, is the fuel leaded? Yes No Unknown

Used Oil (as defined by CFR 279.1)

1. Is this material Used Oil as defined by 40 CFR 279? Yes No Unknown

2. Has this Used Oil been mixed with hazardous waste? Yes No Unknown

3. Is the source of the waste a Conditionally Exempt Small Quantity Generator? Yes No Unknown

4. Does this Used Oil contain chlorinated paraffins? If yes, attach MSDS Yes No Unknown

5. Does this Used Oil contain TSCA (40 CFR 761) regulated levels of PCB? Yes No Unknown
If yes, list PCB level:

6. Does this Used Oil contain less (<) than or equal to 1,000 mg/L Total Organic Halogens (TOX)? *If no, rebuttal per 40 CFR 279.10(b)(1)(ii) must be included. Yes No Unknown

7. Is this Used Oil soluble in water? Yes No Unknown

Is this a virgin or off-spec product? (If Yes, must include MSDS)

1. Unused Product or Chemical Yes No Unknown

2. Waste by-product from process Yes No Unknown

3. Spill Clean Up Yes No Unknown

4. Planned Site Remediation Yes No Unknown

5. Representative Sample Provided Yes No Unknown

Petroleum Contact Water (PCW)/Leaking Yes No Unknown

Underground Storage Tank (LUST) Water Yes No Unknown

Is the generator a Conditionally Exempt Small Quantity Generator (CESQG)? Yes No Unknown

Does this waste contain oils, lubricants, coolants or petroleum products Yes No Unknown

WASTE STREAM COMPOSITION (TOTAL MUST EQUAL 100%)

Major Components	Concentration	Range
(Water, Oil, Solid, etc.)	Average	Minimum Maximum
Well Water	100	100

WASTE DESCRIPTION

Common Name of Waste: TTU-20 Well water

Detail onsite remediation process

Process Generating Waste: (Add additional sheet if necessary)

Physical State	Layers	ph	Flash Point	Specific Gravity
<input type="radio"/> 100% Solid Without Free Liquid	<input checked="" type="radio"/> Single Phase	<input type="radio"/> <2 <input type="radio"/> 8-12.5	<input type="radio"/> <73 F <input type="radio"/> 141-200 F	Range: To:
<input checked="" type="radio"/> 100% Liquid With No Solids	<input type="radio"/> Bi-Layered	<input type="radio"/> 2-6 <input type="radio"/> >12.5	<input type="radio"/> 73-100 F <input type="radio"/> >200 F	Color
<input type="radio"/> Liquid/Solid Mixture	<input type="radio"/> Multi Layered	<input type="radio"/> 6-8 <input checked="" type="radio"/> N/A	<input type="radio"/> 101-140 F <input checked="" type="radio"/> N/A	Describe Colorless
100 % Free Liquid	Odor	<input checked="" type="radio"/> None <input type="radio"/> Mild <input type="radio"/> Strong	Viscosity	TX-Only Classification
0 % Settled Solids	Describe:		<input type="radio"/> Low	<input type="radio"/> Class I
0 % Total Suspended Solids			<input type="radio"/> High	<input type="radio"/> Class II
			<input type="radio"/> Medium	<input type="radio"/> Other:

TX-ONLY: PLEASE INDICATE WHETHER ANY OF THE FOLLOWING ARE PRESENT:

TCLP Metals Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium and Silver

TCLP Semivolatiles (o-Cresol, m-Cresol, p-Cresol, Cresol (total) 2-4 Dinitrotoluene, Hexachlorobenzene, Hexachlorobutadiene, Hexachloroethane, Nitrobenzene, Pentachlorophenol, Pyridine, 2-4-5 Trichlorophenol, and 2-4-6 Trichlorophenol)

TCEQ Appendix 1 (TAC 31, Section 335-Subchapter R) or Total Petroleum Table 1, Constituents Hydrocarbons)

TCLP Herbicides/Pesticides (Chlordane, 2-4 Endrin, Heptachlor, Heptachlor epoxide, Lindane, Methoxychlor, Toxaphene, and 2-4-5 TP/Silver)

TCLP Volatiles (Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroform, Methyl Ethyl Ketone, 1-4 Dichlorobenzene, 1-2 Dichloroethane, 1-1 Dichloroethylene, Trichloroethylene, Tetrachloroethylene, and Vinyl Chloride)

RCI (Reactive Cyanide, Reactive Sulfide, Corrosivity, Ignitability)

TRANSPORTATION INFORMATION

Method of Shipment: Bulk Liquid Bulk Sludge Bulk Solid Drum/Box Other:

Shipment Frequency: One Time Weekly Monthly Quarterly Annually Other:

Anticipated Volume:

GENERATOR CERTIFICATION AND GUARANTEE - PLEASE READ AND SIGN BELOW

As the generator of the material (waste) described above, I certify that I have provided all relevant information as required by this profile and that the information provided is, to the best of my knowledge and belief, true, accurate and complete. Generator agrees not to deliver or arrange for delivery of any material that does not conform to the waste characterization contained in this profile. I further certify that this material is not a RCRA hazardous waste pursuant to federal, state or local laws and has not been mixed with any chlorinated solvents or any other contaminants including, without limitation, PCBs, pesticides, or other hazardous wastes. If Liquid Environmental Solutions (LES) accepts the material for processing and the material is later determined by LES or any other person to be or contain hazardous waste within the meaning of any federal, state or local law, or contain PCBs in sufficient quantity to render it a TSCA-regulated material, the generator agrees to pay all costs incurred by LES to properly treat, store, dispose or otherwise handle the material and any fines and penalties resulting from LES's handling of generator's material. Generator agrees to promptly notify LES of any change in the composition of the material or process generating the material, and agrees to provide LES with a new Uniform Waste Profile prior to delivering any material to LES that does not conform to the waste characterization contained in this profile. The undersigned is an authorized representative of the generator.

Antonio Curiale
Generator Authorization Signature Date 7/11/2024 Print Name and Title Antonio Curiale Environmental Supervisor



UNIFORM WASTE PROFILE
866-694-7327
www.liquidenviro.com

Internal Use Only:
Profile #: 213910
Account #:
Approved [X] Non-Approved []
Subcategory A [] B [] C []
Waste Code

PROFILE INFORMATION

US EPA ID#: AZD020132502 State ID#: NAICS # 332993 TCEQ ID#(TX-Only): Analytical Attached MSDS Attached

GENERATOR INFORMATION

Name: NAMMO DEFENSE SYSTEMS INC
Address: 4111 N HIGLEY ROAD
City: MESA State: AZ Zip: 85215
Contact: Antonio Curiale Title: Main Contact
Phone: (480)898-2261 Fax:
Email: acuriale@nammo.us

BILLING INFORMATION

Name: ACTENVIRO
Address: 6212 S 75th Ave #4
City: Laveen State: AZ Zip: 85339
Contact: Cindy Duncan Title: Project Manager
Phone: (602)509-9591 Fax:
Email: cduncan@actenviro.com and scokey@actenviro.com

WASTE QUESTIONNAIRE (CHECK ALL THAT APPLY)

Non-hazardous Waste-

- 1. Is this material a hazardous waste (F, K, U, or P listed) as defined by 40 CFR 261 Subpart D?
2. Has this material been mixed with a hazardous waste as defined by 40 CFR 261?
3. Does this material exhibit any of the following hazardous waste characteristics?
4. Does this material contain?
5. Is the waste derived from an underground storage tank (UST)?
6. If waste is derived from fuel, is the fuel leaded?

- Is this a virgin or off-spec product? (If Yes, must include MSDS)
1. Unused Product or Chemical
2. Waste by-product from process
3. Spill Clean Up
4. Planned Site Remediation
5. Representative Sample Provided.
Petroleum Contact Water (PCW)/Leaking
Underground Storage Tank (LUST) Water
Is the generator a Conditionally Exempt Small Quantity Generator (CESQG)?
Does this waste contain oils, lubricants, coolants or petroleum products

Used Oil (as defined by CFR 279.1)

- 1. Is this material Used Oil as defined by 40 CFR 279?
2. Has this Used Oil been mixed with hazardous waste?
3. Is the source of the waste a Conditionally Exempt Small Quantity Generator?
4. Does this Used Oil contain chlorinated paraffins? If yes, attach MSDS
5. Does this Used Oil contain TSCA (40 CFR 761) regulated levels of PCB?
6. Does this Used Oil contain less (-) than or equal to 1,000 mg/L Total Organic Halogens (TOX)?
7. Is this Used Oil soluble in water?

WASTE STREAM COMPOSITION (TOTAL MUST EQUAL 100%)

Table with columns: Major Components, Concentration, Range. Row: Well Water, 100, 100.

WASTE DESCRIPTION

Common Name of Waste: TTU Well water
Detail onsite remediation process
Process Generating Waste:
(Add additional sheet if necessary)

Physical State, Layers, pH, Flash Point, Specific Gravity, Odor, Viscosity, TX-Only Classification

TX-ONLY: PLEASE INDICATE WHETHER ANY OF THE FOLLOWING ARE PRESENT:

- TCLP Metals, TCLP Semivolatiles, TCEQ Appendix 1, TCLP Herbicides/Pesticides, TCLP Volatiles, RCI

TRANSPORTATION INFORMATION

Method of Shipment: Bulk Liquid, Bulk Sludge, Bulk Solid, Drum/Box, Other
Shipment Frequency: One Time, Weekly, Monthly, Quarterly, Annually, Other
Anticipated Volume:

GENERATOR CERTIFICATION AND GUARANTEE - PLEASE READ AND SIGN BELOW

As the generator of the material (waste) described above, I certify that I have provided all relevant information as required by this profile and that the information provided is, to the best of my knowledge and belief, true, accurate and complete. Generator agrees not to deliver or arrange for delivery of any material that does not conform to the waste characterization contained in this profile.

Antonio Curiale
Generator Authorization Signature

Date 7/11/2024

Print Name and Title Antonio Curiale Environmental Supervisor