ADDENDUM TO PLAN OF OPERATION

*

Dunn
ENVIRONMENTAL, INC.

ADDENDUM No. 1 - Aerated Pond and Rinse Mud Disposal Management and Sampling Plan (Operation Plan), ConAgra Foods

To: Vicki Jones, Stanislaus County Environmental Health
From: Patrick F. Dunn, P.G., C.Hg.
Date: 10/15/09

Consider this document an addendum to the referenced food processing byproduct reuse operation plan for the ConAgra Food Oakdale Facility. Specific clarifications to the plan and sampling updates are provided. In order to address some of the toxicity concerns raised from a series of public comments regarding the mud reuse, additional sample collection and analyses were completed for characterization efforts as described below.

Operational Plan Clarifications

Clarification 1 - As referenced in the response to comment letter No 24A from the San Joaquin Valley Air Pollution Control District (Air District), this addendum has been used to clarify the dredge options associated with the aerated pond mud removal. Section 1 page 2 of the plan referenced the "full scale" or "full time" dredge operation. The Air District was contacted regarding the health risk model result completed by the them due to a misinterpretation of the full scale dredge operation schedule. Their modeling reflected a repeat operation to occur every other month for a three week period at 50 trucks per day with over 4,000 trucks total. This addendum is intended to clarify that the full scale dredge would be a three-week operation occurring only one time. The sensitive parameter in the referenced air model run by the Air District was the truck idle time of 25 minutes. The Air District indicated that based on the clarification regarding a full-scale dredge one time occurrence and if the idle time was reduced, the need to provide additional modeling by ConAgra is not necessary. Trucks will be required to shut off engines during loading onsite to eliminate truck idle time.

Clarification 2 –ConAgra will begin the land application of by-product mud at the most rural subject parcels during the initial phases of the operation, and will closely evaluate project conditions prior to land application occurs at subject sites near the Oakdale City limits.

*

Previous Sampling and Description

As referenced in the operation plan, Dunn Environmental performed the Aerated Pond soil sampling on July 14, 2009. Previous sampling efforts related to the Aerated Mud and Rinse Mud were completed in 2007 and 2004. For the 2009 sampling effort, samples were taken using 3 inch diameter Shelby tube that was pushed into the sludge and underlying sediment. The Shelby tubes were either 2.5 or 3 feet in length. Samples were then lifted out and placed in gallon plastic bags and stored on ice in coolers. If sludge was present within the sampler, the sludge was removed from the top and submitted to the lab as a separate sample. Sediment and sludge were described according to composition and color using a Munsell Color Chart.

Aerated Pond sediment was consistent in description. Sludge samples were high in moisture, slight odor with low plasticity organic material. The grain size was primarily silt with 0.5 to 1 mm organics with color ranging from very dark brown (10YR 2/2) to black (10YR 2/1). Most samples had a gelatinous or paste-like texture with the exception of areas where the aerators had removed sludge due to the strength of the aerator engines. The material near waypoints 173, 180, and 188 was void of sludge and consisted of a stiff clay-like material with poor sample return.

Rinse mud samples were collected directly from the clarifier box on site. These samples were composed of silt soils, tomato stems and broken tomatoes.

Additional 2009 Analytical Results

The additional analyses and comparisons provided are associated with metal results primarily. The Total CAM (California Assessment Metals) and DTPA values (Plant Available) for the aerated mud 2007 and the 2009 Total CAM and DI-Wet leachate method results were compared as presented in the following tables. An additional rinse mud result was collected and analyzed.

The 2007 and 2009 aerated mud general mineral/inorganic results are depicted in Tables 1 and 2. Two figures are provided that show the depth to the sediment below the top to berm. The average pH for all samples collected in 2007 and 2009 increased to 7.30 from 6.8. For total dissolved solids, the average decreased to 2,358 ppm from 2,600. The average specific conductance increased to 4,102 from 3,929 μS/cm; and the total organic carbon average decreased to 10,477 ppm, from 19,684 in 2007. When comparing inorganic results from 2007 and 2009, the following is apparent: CEC, chloride, magnesium, pH, and TOC are lower during 2009. Moisture, Total nitrogen, phosphorus, K, SAR, Na, and TKN are higher during 2009. The total nitrogen average concentration is 59,595 ppm, increased significantly from 1,731 ppm in 2007.

For the referenced 2009 mud samples, the total CAM values indicate the total metal concentrations, DTPA values reflect the portion of nutrients available to plants and the Deionized (DI) -Wet Tests are used for special waste classification. Special waste disposal options, as per Title 22 of the California Code of Regulations (CCR), are

*

determined based on the Total and DI-Wet leachable test results. The individual and average total, extractable and DI-Wet metal results are presented in Tables 3 through 5. Results were compared to CCR Title 14 California Integrated Waste Management Compost regulation maximum acceptable metal concentrations. The Title 14 regulatory levels are three to ten times lower than the Title 22 special waste disposal criteria. Note that no laboratory results are above the total or DI-Wet extractable metal levels for either the Title 14 or Title 22 regulations. The values are significant lower than these regulatory limits. DTPA and total metal results are similar between 2007 and 2009, with the exceptions of nickel and lead which were lower during 2009. Additionally, total barium concentrations were lower during 2009. Pesticides were tested and reported as non-detect. Table 6 shows 2009 rinse mud sample data similar to 2004 sample results. Additional metal analyses will be completed during the dredge operation. However the need to complete additional pesticide sampling is not warranted due to the non-detect result reported and the low likelihood for pesticides remaining on the product during the rinse and plant process.

Regarding pathogen analysis and fate analysis within shallow soils, the potential of pathogen impacts to soil and harvested nuts are minimal with the addition of the byproduct mud to the manure matrix that is already part of the farming practice. In addition, the timing after harvest, thin application and disking will minimize the impact from pathogens. Laboratory testing has confirmed that pathogens, as plant parasitic nematodes only, are non-detect in the mud. In addition, the byproduct mud has low potential of providing a matrix to support pathogens due to the low organic content of this anaerobically treated mud. Note that for mature trees, the manure and mud mix application occurs after harvest and during early spring to minimize the exposure of the pathogens during the nut harvest.

Table 1 - Aerated Pond Mud
General Mineral/Inorganics 2007
9/9/07 and 10/23/07 Sampling

Sample Name	Boron	Ca	CEC	Cl	EC	Excess Carbonates	Total Fixed Solids	Mg	Moisture	Nitrate Nitrogen	Percolation	pH	Phosphorus	Potassium	SAR	Sodium	Soluble Salts	Sulfate Sulfur	TDS	TKN	Total Nitrogen	TOC
Units	ppm	ppm		meq/L	uS/cm	NA	mg/L	ppm	%	ppm	NA	Units	ppm	ppm	%	ppm	ppm	ppm	ppm	ppm	ppm	ppm
WP-5	-	-	4.3	-	2,500	-	-	-	43	<2.0	-	7.7	1	-	-	-	-	-	-	460	460	1,000
WP-9	-	-	4.2	-	1,200	-	-	-	41	<2.0	-	7.6	0.8	-	-	-	-	-	-	390	390	17,000
WP-11	-	-	3.3	-	530	-	-	-	33	<2.0	-	7.6	0.2	-	-	-	-	-	-	180	180	16,000
WP-12	-	-	2.4	-	320	-	-	-	38	<2.0	-	7.4	<0.2	-	-	-	-	-	-	60	60	18,000
WP-28	-	660	90	94	3,000	-	310,000	6500	39	1.1	-	8.2	88	440	0.7	290	-	-	4,100	1,700	1,700	23,000
WP-30	-	620	80	86	1,800	-	270,000	4100	29	0.6	-	7.9	84	540	0.7	210	-	-	3,300	1,600	1,600	21,000
WP-31	-	630	80	57	4,100	-	210,000	3200	34	<1.0	-	8	76	930	0.6	180	-	-	3,600	1,700	1,700	21,000
WP-32	-	590	60	88	7,000	-	110,000	2000	21	0.7	-	8.2	90	820	0.8	190	-	-	2,400	3,000	3,000	21,000
WP-43	-	650	60	88	6,900	-	130,000	2100	21	0.4	-	8.3	86	750	0.7	170	-	-	1,500	3,200	3,200	17,000
WP-47	-	610	70	47	5,900	-	140,000	2100	22	0.5	-	8.1	94	840	0.7	160	-	-	2,600	2,400	2,400	20,000
WP-48	-	580	60	63	6,200	-	380,000	2700	41	0.4	-	8.2	58	980	0.7	170	-	-	2,300	2,400	2,400	15,000
WP-53	-	520	50	95	4,600	-	220,000	3000	36	0.4	-	8.2	82	940	0.6	160	-	-	2,200	2,800	2,800	23,000
WP-59	-	1500	70	93	7,200	-	120,000	2200	20	0.7	-	8.1	78	760	0.6	150	-	-	1,700	2,500	2,500	21,000
WP-61	-	640	50	55	3,900	-	400,000	2400	39	0.5	-	8.1	106	830	0.7	160	-	-	1,300	1,600	1,600	17,000
WP-64	-	970	60	91	2,500	-	200,000	3100	31	0.7	-	7.4	46	450	0.9	250	-	-	6,000	1,300	1,300	32,000
WP-65	-	650	60	75	4,600	-	180,000	2700	27	0.5	-	7.9	114	810	0.7	170	-	-	2,400	2,000	2,000	23,000
WP-66	-	660	50	88	5,400	-	130,000	2100	22	0.5	-	8	82	730	0.8	180	-	-	1,900	1,200	1,200	19,000
WP-67	-	570	70	110	4,300	-	290,000	2700	34	0.3	-	8	114	930	0.7	190	-	-	1,700	1,800	1,800	22,000
WP-72	-	470	80	66	2,700	-	300,000	4000	40	1.6	-	8.1	122	380	0.6	190	-	-	2,000	2,600	2,600	27,000
Average	*NA*	*688*	*53*	*80*	*3,929*	*NA*	*226,000*	*2,993*	*32*	*0.6*	*NA*	*7.9*	*73*	*742*	*0.7*	*188*	*NA*	*NA*	*2,600*	*1,731*	*1,731*	*19,684*

Table 2 - Aerated Pond Mud
General Mineral/Inorganics 2009
7/14/09 Sampling

Sample Name	Boron	Ca	CEC	Cl	EC	Excess Carbonates	Fixed Dissolved Solids	Mg	Moisture	Nitrate Nitrogen	Percolation	pH	Phosphorus	Potassium	SAR	Sodium	Soluble Salts	Sulfate Sulfur	TDS	TKN	Total Nitrogen	TOC
Units	ppm	ppm		meq/L	uS/cm	NA	ppm	ppm	%	ppm	NA	Units	ppm	ppm	%	ppm	ppm	ppm	ppm	ppm	ppm	ppm
6-25 NE CORNER	0.15	1230	10.8	4.3	1,590	None	224	201	59.3	44	High	6.3	98	348	0.16	73	1,018	180	828	297	29,400	2,200
6-26 NW CORNER	0.35	950	12.5	9.1	2,920	None	191	286	62	116	High	6.3	122	661	0.59	381	1,869	160	1,510	616	71,700	2,800
6-26 SETTLING POND	0.44	1140	16.3	12.6	6,430	None	796	398	77	340	High	6.3	125	1,050	0.45	446	4,115	445	3,340	778	112,000	1,900
6-27 SE CORNER	0.25	890	10.8	9.8	4,290	None	412	261	56.3	220	High	6.8	118	722	0.56	318	2,746	185	2,300	627	61,500	2,300
6-27 SW CORNER	0.14	660	5.7	7.1	3,210	None	301	136	27.6	287	High	7.1	60	323	0.37	104	2,054	180	1,710	179	14,000	600
6-29 S CENTRAL	0.25	760	13	7.6	2,340	None	379	355	22.5	94	High	5.6	118	481	0.31	165	1,498	125	1,250	224	18,800	1,200
6-29 SE SIDE	0.49	530	6.1	5.9	3,500	None	277	181	35	87	High	6.6	62	365	0.47	10	2,240	110	1,810	218	21,600	1,100
6-29 WEST SIDE	0.13	640	6.9	6.9	1,980	None	174	208	31.2	102	High	7	84	554	0.42	129	1,267	118	1,020	207	20,000	2,100
6-30 EAST SIDE	0.17	1450	13.3	8.4	3,090	None	156	261	72.9	88	High	7.3	124	708	0.36	480	1,978	200	1,620	941	128,000	3,300
6-30 SOUTH SIDE	0.28	1190	13.4	7.6	2,980	None	196	297	68.4	101	None	6.7	119	729	0.47	451	1,907	90	1,540	711	82,700	2,700
WP 172-SLUDGE	0.29	1250	20	21.4	3,010	None	784	458	92.8	116	Moderate	6.9	470	1,480	2.3	1430	1,926	525	1,530	17,640	199,000	4,800
WP 172-SOLIDS	0.37	980	12.9	15.7	5,350	None	813	352	79.3	370	High	6.9	345	1,040	1.5	573	3,424	300	2,790	9,240	188,000	4,500
WP 175-SLUDGE	0.38	1400	23.8	20.7	6,040	None	904	539	93.4	401	High	6.7	460	1,570	1.8	1420	3,866	305	3,150	17,470	139,000	4,300
WP 175-SOLIDS	0.36	970	13.6	13.2	5,060	None	766	318	77.5	298	High	6.8	330	990	1.5	540	3,238	325	2,630	8,850	301,000	4,300
WP 176-SLUDGE	0.41	1420	25.7	27.1	7,490	None	1040	628	96.2	410	Low	7.1	515	2,280	2	1750	4,794	360	3,760	6,940	98,000	4,900
WP 176-SOLIDS	0.31	890	11.3	12.2	4,720	None	617	345	76.7	112	High	7	131	831	1.4	438	3,021	250	2,460	9,460	118,000	3,500
WP 178-SOLIDS	0.33	1010	12.7	11.9	4,890	None	702	279	72.9	152	High	6.8	128	832	1.3	479	3,130	370	2,540	7,950	117,000	3,700
WP 179-SOLIDS	0.31	1180	13.7	14.1	5,050	None	941	373	79.3	214	High	6.9	380	937	1	536	3,232	145	2,650	11,200	151,000	4,300
WP 180-SOLIDS	0.16	1220	13	12.2	3,660	None	610	297	43.1	76	High	7.3	111	1,050	0.8	413	2,342	275	1,880	5,712	95,000	4,200
WP 181-SOLIDS	0.38	870	11.8	12.9	4,860	None	490	336	74	88	High	6.9	128	1,020	1.6	481	3,110	170	2,550	9,464	104,000	3,600
WP 182-SOLIDS	0.32	1030	16.1	15.1	5,800	None	876	330	84.8	161	High	6.8	345	1,230	2.1	840	3,712	115	3,070	11,704	123,000	4,200
WP 183 Sludge	0.34	980	15.7	15.1	5,200	None	581	411	85.7	276	High	6.7	415	907	2	840	3,328	500	2,730	8,740	138,000	3,700
WP 183 Solids	0.23	850	8.3	9.6	3,530	None	326	189	62.3	155	High	7.2	118	567	1	240	2,259	225	1,810	5,090	72,000	2,600
WP 187	0.38	930	13.8	13.9	4,730	None	564	330	79.3	189	High	6.7	128	1,010	1.8	606	3,027	280	2,480	10,080	127,000	3,700
Average	*0.30*	*1017.5*	*13*	*12*	*4,238*	*NA*	*547*	*324*	*67*	*187*	*NA*	*6.8*	*210*	*903.5*	*1.09*	*548*	*2712.5*	*247*	*2,207*	*6,014*	*105,404*	*3,188*

Table 3 - Total Metals
2007 and 2009
Units in mg/kg

Sample Name	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Iron	Lead	Manganese	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
9/9/07 and 10/23/07 Sampling																			
WP-5	<2.0	1.5	90	<1.0	<1.0	7.8	3.6	8.6	-	10	-	<0.1	1	19	<1.0	<1.0	<1.0	6.2	58
WP-9	<2.0	1.9	92	<1.0	<1.0	6.8	3.4	9.5	-	12	-	<0.1	1	20	<1.0	<1.0	<1.0	6.4	56
WP-11	<2.0	1.3	87	<1.0	<1.0	5.9	3.7	6.1	-	12	-	<0.1	1.2	18	<1.0	<1.0	<1.0	6.4	45
WP-12	<2.0	1.2	88	<1.0	<1.0	3.2	4.8	0	-	3.2	-	<0.1	<1.0	5.6	<1.0	<1.0	<1.0	7	17
WP-28	<2.0	2.1	77	<1.0	<1.0	27	4.1	43	12000	5.5	230	<0.1	1.2	25	<1.0	<1.0	<1.0	24	83
WP-30	<2.0	2	90	<1.0	<1.0	30	4.2	53	13000	5.6	180	<0.1	1	25	<1.0	<1.0	<1.0	24	76
WP-31	<2.0	2.3	89	<1.0	<1.0	29	3.9	49	11000	5.4	140	<0.1	<1.0	25	<1.0	<1.0	<1.0	24	75
WP-32	<2.0	1.5	63	<1.0	<1.0	21	2.7	37	7200	3.5	100	<0.1	1.1	16	<1.0	<1.0	<1.0	16	55
WP-43	<2.0	1.5	58	<1.0	<1.0	18	2.7	32	8000	3.3	130	<0.1	<1.0	15	<1.0	<1.0	<1.0	16	50
WP-47	<2.0	1.6	59	<1.0	<1.0	19	2.7	31	8200	3.7	130	0.3	1.1	17	<1.0	<1.0	<1.0	17	54
WP-48	<2.0	2	71	<1.0	<1.0	26	4	36	12000	4.2	220	<0.1	<1.0	22	<1.0	<1.0	<1.0	20	52
WP-53	<2.0	1.9	60	<1.0	<1.0	20	3	35	8700	4.9	130	<0.1	<1.0	22	<1.0	<1.0	<1.0	20	59
WP-59	<2.0	1.6	58	<1.0	<1.0	17	2.7	33	7200	4.2	110	<0.1	<1.0	17	<1.0	<1.0	<1.0	17	56
WP-61	<2.0	1.5	61	<1.0	<1.0	19	3.3	25	11000	4.7	130	<0.1	<1.0	18	<1.0	<1.0	<1.0	26	50
WP-64	<2.0	2.8	71	<1.0	<1.0	23	3.3	37	10000	9.9	140	<0.1	<1.0	29	<1.0	<1.0	<1.0	28	66
WP-65	<2.0	3	75	<1.0	<1.0	24	3.6	40	8900	10	160	<0.1	<1.0	31	<1.0	<1.0	<1.0	30	71
WP-66	<2.0	1.6	52	<1.0	<1.0	15	2.5	30	7700	4.3	120	<0.1	<1.0	19	<1.0	<1.0	<1.0	19	52
WP-67	<2.0	2.1	77	<1.0	<1.0	23	3.9	38	13000	8.8	210	<0.1	<1.0	24	<1.0	<1.0	<1.0	27	69
WP-72	<2.0	2.8	87	<1.0	<1.0	28	4.2	49	13000	9.2	190	<0.1	1	30	<1.0	<1.0	<1.0	31	92
7/14/09 Sampling																			
WP 172	<2.0	1.5	34	<1.0	<1.0	11	1.9	23	-	2.7	-	<0.1	<1.0	13	<1.0	<1.0	<1.0	13	42
WP 175	<2.0	1.9	48	<1.0	<1.0	14	2.3	28	-	1.7	-	<0.1	<1.0	11	<1.0	<1.0	<1.0	12	45
WP 176	<2.0	1.7	68	<1.0	<1.0	18	3	40	-	1.4	-	<0.1	<1.0	15	<1.0	<1.0	<1.0	17	51
WP 178	<2.0	1.6	52	<1.0	<1.0	18	2.5	30	-	2.5	-	<0.1	<1.0	14	<1.0	<1.0	<1.0	14	48
WP 179	<2.0	1.5	40	<1.0	<1.0	14	2.3	26	-	3	-	<0.1	<1.0	13	<1.0	<1.0	<1.0	14	45
WP 181	<2.0	1.7	39	<1.0	<1.0	12	2.1	24	-	2.3	-	<0.1	<1.0	11	<1.0	<1.0	<1.0	13	39
WP 182	<2.0	2.3	40	<1.0	<1.0	14	2	26	-	2.8	-	<0.1	<1.0	15	<1.0	<1.0	<1.0	15	43
WP 183 Sludge	<2.0	1	35	<1.0	<1.0	11	1.7	24	-	1.4	-	<0.1	<1.0	8.8	<1.0	<1.0	<1.0	8.4	39
WP 183 Solids	<2.0	2.6	50	<1.0	<1.0	17	2.7	31	-	6.1	-	0.3	<1.0	25	<1.0	<1.0	<1.0	27	47
WP 187	<2.0	1.2	48	<1.0	<1.0	15	2.1	32	-	1.7	-	<0.1	<1.0	12	<1.0	<1.0	<1.0	12	47
Average	*NA*	*1.8*	*64*	*NA*	*NA*	*17*	*3.1*	*30*	*10060*	*5.2*	*155*	*NA*	*1.1*	*18.5*	*NA*	*NA*	*NA*	*17.6*	*54.6*
Title 14 Compost Maximum	*NA*	*41*	*NA*	*NA*	*39*	*1200*	*NA*	*1500*	*NA*	*300*	*NA*	*17*	*NA*	*420*	*36*	*NA*	*NA*	*NA*	*2800*
Title 22 Special Waste TTLC Levels	*500*	*500*	*10000*	*75*	*100*	*2500*	*8,000*	*2500*	*NA*	*1,0000*	*NA*	*20*	*3,500*	*2,000*	*100*	*500*	*700*	*2,400*	*5,000*

Table 4 - Aerated Pond Mud
DTPA Metals
9/9/07 and 10/23/07
Units in mg/kg

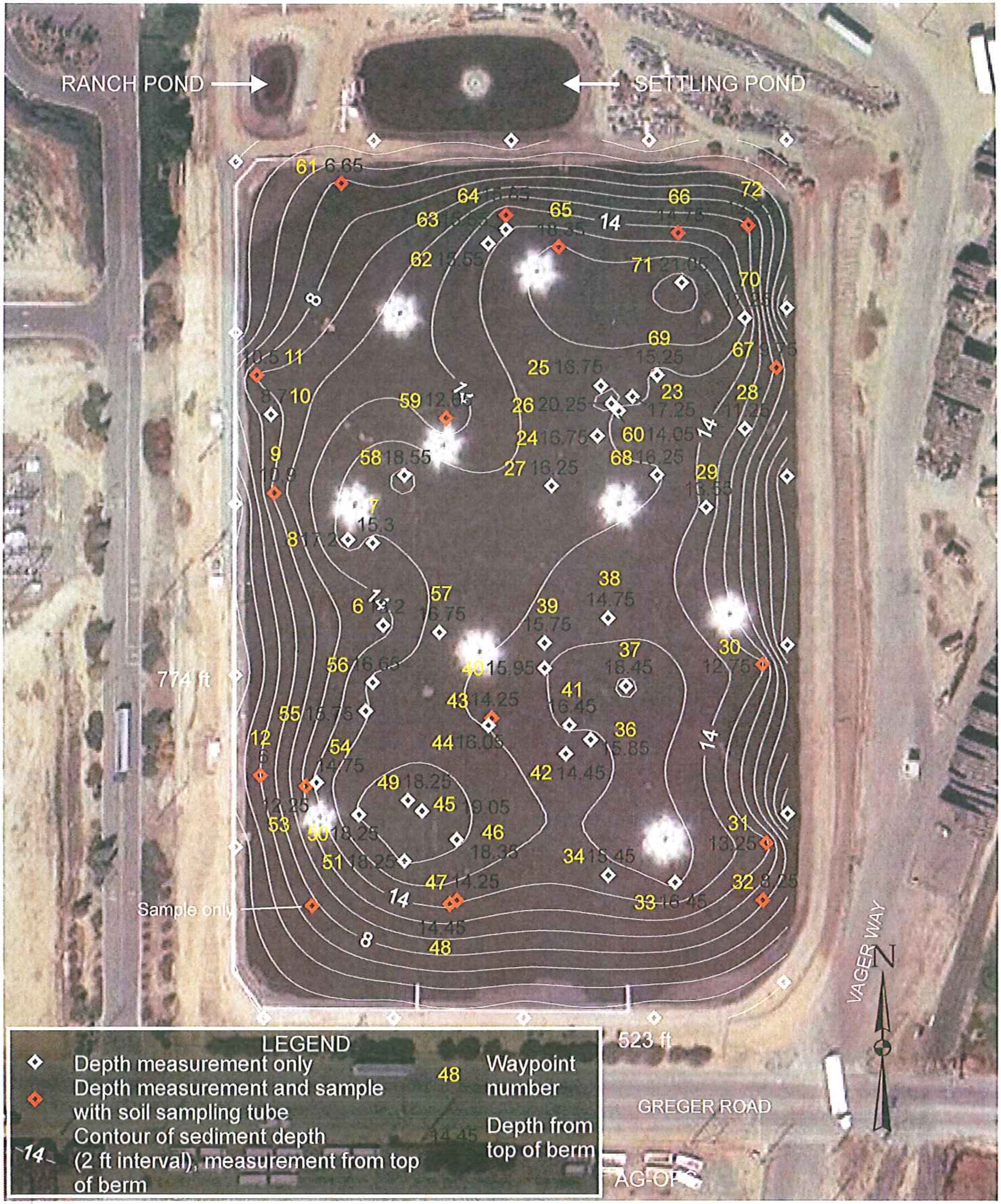
Sample Name	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Iron	Lead	Manganese	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
WP-5	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	290	2.3	<20	<0.10	<1.0	<1.0	<1.0	<1.0	<1.0	1	<5.0
WP-9	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	330	3.1	<20	<0.10	<1.0	1.6	<1.0	<1.0	<1.0	1.3	5.6
WP-11	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	220	3.2	<20	<0.10	<1.0	<1.0	<1.0	<1.0	<1.0	1.2	<5.0
WP-12	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	48	<1.0	22	<0.10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<5.0
WP-28	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	190	3.9	<20	<0.10	<1.0	1.9	<1.0	<1.0	<1.0	1.3	13
WP-30	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	300	1.5	<20	<0.10	<1.0	1.4	<1.0	<1.0	<1.0	1.4	5.2
WP-31	<2.0	<1.0	8.4	<1.0	<1.0	<1.0	<1.0	6.4	220	1.5	<20	<0.10	<1.0	1.4	<1.0	18	<1.0	1.5	22
WP-32	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	4.7	180	1.3	<20	<0.10	<1.0	<1.0	<1.0	<1.0	<1.0	1.7	18
WP-43	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	6.8	140	<1.0	<20	<0.10	<1.0	<1.0	<1.0	<1.0	<1.0	1.2	18
WP-47	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	5.2	140	1.1	<20	<0.10	<1.0	1.5	<1.0	<1.0	<1.0	1.3	22
WP-48	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	220	1.1	<20	<0.10	<1.0	1	<1.0	<1.0	<1.0	1.2	5.5
WP-53	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	260	1.5	<20	<0.10	<1.0	3.2	<1.0	<1.0	<1.0	1.6	11
WP-59	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	2.2	140	<1.0	<20	<0.10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	9.5
WP-61	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	120	1.1	<20	<0.10	<1.0	1	<1.0	<1.0	<1.0	1.4	7
WP-64	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	2.6	250	3.2	<20	<0.10	<1.0	6.1	<1.0	<1.0	<1.0	1.8	14
WP-65	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	3.3	240	2.7	<20	<0.10	<1.0	4.4	<1.0	<1.0	<1.0	2.1	14
WP-66	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	210	1.4	<20	<0.10	<1.0	2	<1.0	<1.0	<1.0	1.4	9.9
WP-67	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	220	1.6	<20	<0.10	<1.0	1.7	<1.0	<1.0	<1.0	1.5	5.6
WP-72	<2.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<2.0	440	3.6	<20	<0.10	<1.0	7.2	<1.0	<1.0	<1.0	2.4	7.8
Average	*NA*	*NA*	*8.4*	*NA*	*NA*	*NA*	*NA*	*4.5*	*219*	*2.1*	*22*	*NA*	*NA*	*2.6*	*NA*	*18*	*NA*	*1.5*	*12*
Title 14 Compost Maximums	NA	41	NA	NA	39	1200	NA	1500	NA	300	NA	17	NA	420	36	NA	NA	NA	2800

Table 5 - Aerated Pond Mud
DI Wet Test Metals
7/14/09
Units in mg/L

Sample Name	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Iron	Lead	Manganese	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc	Ca	Mg	K	Na
WP 175	<0.2	<0.1	1.7	<0.1	<0.1	<0.1	<0.1	<0.2	170	<0.1	5	<0.01	<0.1	0.1	<0.1	<0.1	<0.1	0.2	1.3	46	18	14	<5.0
WP 178	<0.2	<0.1	1.9	<0.1	<0.1	<0.1	<0.1	<0.2	210	<0.1	6	<0.01	<0.1	0.2	<0.1	<0.1	<0.1	0.2	1.5	45	21	15	<5.0
WP 179	<0.2	<0.1	2	<0.1	<0.1	<0.1	<0.1	<0.2	140	<0.1	3.5	<0.01	<0.1	0.2	<0.1	<0.1	<0.1	0.3	1.6	75	22	13	<5.0
WP 183 Solids	<0.2	<0.1	2.1	<0.1	<0.1	<0.1	<0.1	<0.2	160	<0.1	4.3	<0.01	<0.1	0.4	<0.1	<0.1	<0.1	0.4	1.8	65	22	13	<5.0
Average	*NA*	*NA*	*1.9*	*NA*	*NA*	*NA*	*NA*	*4.5*	*170*	*2.1*	*4.7*	*NA*	*NA*	*0.2*	*NA*	*18.0*	*NA*	*0.3*	*1.6*	*58*	*21*	*14*	*NA*
Title 22 STLC Disposal Criteria	*15*	*5*	*100*	*0.75*	*1*	*5*	*80*	*25*	*NA*	*5*	*NA*	*0.2*	*350*	*20*	*1*	*5*	*7*	*24*	*50*				

Table 6 - Rinse Mud Results from 2004 and 2009

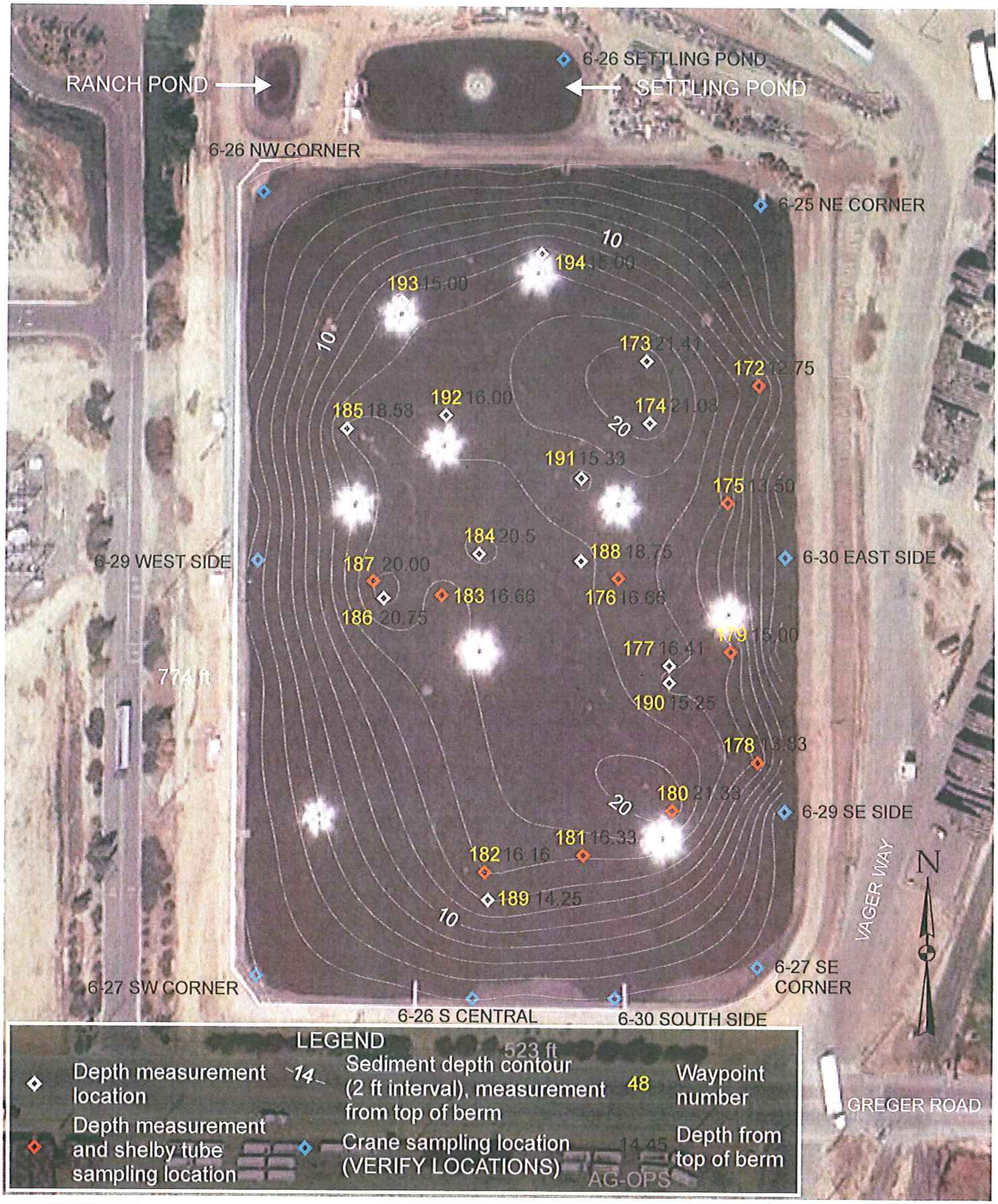
Sample Analysis Date	Units	7/21/04	8/5/04	8/11/04	9/2/04	9/2/04	9/16/04	9/24/04	10/4/04	10/6/04	8/6/09	*Average Nutrients Lbs/Ton of Rinse Mud Application*
pH		-	6.2	6.5	6.8	5.5	5.3	5.5	5.7	5.4	6.8	-
Soluble Salts dS/m		-	4.1	1.6	5.3	1.8	2.1	2.4	2.5	2.3	1.91	-
Cl	%	-	0.31	0.14	0.29	0.1	0.01	0.06	0.32	0.02	-	-
Nitrogen	Pounds Nutrients /Wet Ton	4.39	2.87	1.1	4.16	4.09	12.41	10.08	3.82	2.93	0.28	*4.613*
Boron	Pounds Nutrients /Wet Ton	0.0458	<0.01	0.005	0.04	0.026	0.06	0.073	0.0225	0.062	<0.01	*0.0417*
Zn	Pounds Nutrients /Wet Ton	0.091	0.0208	0.005	0.08	0.026	0.06	0.049	<0.0225	0.0312	0.0192	*0.0425*
PO4	ppm	-	-	-	-	-	-	-	-	-	125	-
K	ppm	-	-	-	-	-	-	-	-	-	2580	-
Ca	ppm	-	-	-	-	-	-	-	-	-	2170	-
Mg	ppm	-	-	-	-	-	-	-	-	-	719	-
Na	ppm	-	-	-	-	-	-	-	-	-	229	-
Mn	ppm	-	-	-	-	-	-	-	-	-	54	-
Sulfate	ppm	-	-	-	-	-	-	-	-	-	430	-
Fe	ppm	-	-	-	-	-	-	-	-	-	70	-
CEC	meq/100gm	-	-	-	-	-	-	-	-	-	26.8	-
Sb	ppm	-	-	-	-	-	-	-	-	-	<2.0	-
As	ppm	2.6	2.5	-	-	1.2	ND	1.5	-	1.5	<1.0	-
Ba	ppm	-	-	-	-	-	-	-	-	-	24	-
Be	ppm	-	-	-	-	-	-	-	-	-	<1.0	-
Cd	ppm	-	-	-	-	-	-	-	-	-	<1.0	-
Cr	ppm	14.3	12.9	-	-	27.3	36.2	12	-	15.9	7.0	-
Co	ppm	-	-	-	-	-	-	-	-	-	<1.0	-
Cu	ppm	-	-	-	-	-	-	-	-	-	3.6	-
Pb	ppm	-	-	-	-	-	-	-	-	-	<1.0	-
Hg	ppm	-	-	-	-	-	-	-	-	-	<0.1	-
Mo	ppm	-	-	-	-	-	-	-	-	-	<1.0	-
Ni	ppm	-	-	-	-	-	-	-	-	-	7.8	-
Se	ppm	-	-	-	-	-	-	-	-	-	<1.0	-
Ag	ppm	-	-	-	-	-	-	-	-	-	<1.0	-
Tl	ppm	-	-	-	-	-	-	-	-	-	<1.0	-
V	ppm	-	-	-	-	-	-	-	-	-	6.2	-
Zn	ppm	-	-	-	-	-	-	-	-	-	9.6	-
Pesticides	ppb	-	-	-	-	-	-	-	-	-	ND	-



Dunn ENVIRONMENTAL, INC.

DATE:07/20/2009
SCALE: 1":120'
PROJECT NO: 102-15
DRAWN: MM
CHECKED: PFD
FIGURE: 2

2007 AERATED POND SAMPLING AND MUD DEPTH MEASUREMENT CONTOURS
CONAGRA FOODS, INC
STANISLAUS COUNTY, CALIFORNIA



Dunn ENVIRONMENTAL, INC.

DATE:07/20/2009	2009 AERATED POND SAMPLING AND MUD DEPTH MEASUREMENT CONTOURS CONAGRA FOODS, INC STANISLAUS COUNTY, CALIFORNIA
SCALE: 1":120'	
PROJECT NO: 102-19	
DRAWN: MM	
CHECKED: PFD	
FIGURE: 3	