ChemDesign

NR 718 Material Management Plan

1.0 Purpose of Request

ChemDesign Products, Inc. (ChemDesign) is a tenant on the property located at One Stanton Street, Marinette, Wisconsin (Property), located on the banks of the Menomonee River. The landlord, Tyco Fire Products LP (Tyco) also has operations on the Property and entered a Resource Conservation and Recovery Act (RCRA) Administrative Order on Consent (AOC) in 2009 with the U.S. Environmental Protection Agency (EPA) under which Tyco has performed corrective actions and maintains institutional controls.

ChemDesign intends to install a new six-inch water line to connect the water line for ChemDesign Building 1 to an existing water main on the Tyco Property (ChemDesign Proposed Work).

A small portion of cover Area J under the RCRA AOC may be intersected during the ChemDesign Proposed Work, as indicated in a memorandum from Tyco, emailed to EPA on January 16, 2024.

As required by Wisconsin Administrative Code (WAC) Chapter NR 718 Management of Contaminated Soil or Solid Wastes Excavated During Response Actions (NR 718), this Material Management Plan (MMP) provides procedures to be implemented at the Property to properly manage contaminated soil onsite during the ChemDesign Proposed Work, which will involve earth moving and other onsite subsurface activities. The MMP was prepared based on review of available information. This MMP is consistent with the MMP previously submitted by Tyco for other work on the property.

ChemDesign is requesting an exemption from the NR 718.12 (1) (c) location standard requirements so that contaminated soil can be managed, stockpiled, and backfilled within the general area from which it is excavated, as allowed in NR 718.12 (1) (d). It is anticipated that the stockpiled soil will be backfilled or containerized within one to two days, but no longer than fifteen (15) days.

2.0 Contact and Property Information

Information About the Property Where Material is Proposed to be Excavated and Stored

| Property Name | Tyco Fire Products LP |
|----------------------|--|
| Other Property Names | Tyco, Ansul |
| BRRTS #s | 02-38-000011 |
| FID# | 438039470 |
| Address | One Stanton Street, Marinette, WI 54143 |
| County | Marinette |
| Location | NW 1/4 of the SW 1/4 of Sec 05, T30N, R24E |
| Parcel IDs | 251-4273.1, 251-4273.2, 251-4273.5, 251-4273.8, 251-4273.9 |
| WTM Coordinates | - |
| Latitude/Longitude | 45.0978639, -87.6160825 |
| Current Zoning | Industrial |
| Current Land Use | Manufacturing |

Contact Information

| Description of the Description of the Control of th | Decreased by Decreased Decreased | | | | | |
|--|--|--|--|--|--|--|
| Responsible Party, Property Owner | Responsible Party and Requestor: | | | | | |
| and Requestor | Thomas Willis, EHS Director | | | | | |
| | ChemDesign Products, Inc. | | | | | |
| | 2 Stanton Street | | | | | |
| | Marinette, WI 54143 | | | | | |
| | twillis@chemdesign.com | | | | | |
| | 715.735.8263 | | | | | |
| | Property Owner: | | | | | |
| | Denice Nelson, Senior Director, Remediation and Strategy | | | | | |
| | Тусо | | | | | |
| | 5757 North Green Bay Avenue | | | | | |
| | Glendale, WI 53209 | | | | | |
| | denice.karen.nelson@jci.com | | | | | |
| | 651.280.7259 | | | | | |
| Environmental Consultant | Jeffrey Danko, PG | | | | | |
| | Endpoint Solutions Corp. | | | | | |
| | 6871 South Lovers Lane | | | | | |
| | Franklin, WI 53132 | | | | | |
| | jeff@endpointcorporation.com | | | | | |
| | 414.427.1200 | | | | | |
| WDNR Contact | Sarah Kreuger | | | | | |
| | WDNR | | | | | |
| | 2984 Shawano Avenue | | | | | |
| | Green Bay, WI 54313 | | | | | |
| | sarah.krueger@wisconsin.gov | | | | | |
| | 920.510.8277 | | | | | |
| EPA Contact | Andrew Kleinberg, Project Manager – Geologist | | | | | |
| | RCRA Corrective Action Section 2 | | | | | |
| | Land, Chemicals & Redevelopment Division, Region 5, EPA | | | | | |
| | 77 West Jackson Blvd. (LR-16J), | | | | | |
| | Chicago, IL 60604 | | | | | |
| | Kleinberg.Andrew@epa.gov | | | | | |
| | 312.353.4374 | | | | | |
| Initiator for Proposed Activities | Thomas Willis, EHS Director | | | | | |
| , i | ChemDesign Products, Inc. | | | | | |
| | 2 Stanton Street | | | | | |
| | Marinette, WI 54143 | | | | | |
| | twillis@chemdesign.com | | | | | |
| 1 | <u> </u> | | | | | |
| | 715.735.8263 | | | | | |

3.0 Results of Analysis Performed and Characteristics of Waste

Describe the characteristics of the contaminated soil and/or other solid waste material that will be managed under this request, describe the sampling activities conducted and demonstrate how it has been adequately characterized.

| - OCC | n adequately characterized. | , |
|-------|---|---|
| A. | Total volume of contaminated soil and/or other solid waste to be managed (cubic yards) | An estimated 85 cubic yards (yd³) are planned for removal. Of that 25 yd³ are planned for offsite disposal at the Waste Management Landfill located in Arlington, Oregon, and 60 yd³ will be reused onsite as backfill within the general area from which it is excavated. |
| B. | Characteristics of the material proposed to be managed (which may include general makeup, physical characteristics, the homogeneity of the material, the proportion of soil to other solid waste, and any other pertinent descriptors): | Contaminated soil at the site would consist primarily of fill materials, native soil, and occasional debris. Fill and underlying native materials are described in Attachment 1, Section Geologic and Hydrogeologic Characteristics. |
| C. | Describe the historical and current land use of the generating site or facility where the contaminated soil or other solid waste originates. | ChemDesign understands that the Property was first used for lumber mill operations, sawdust disposal, and raw and cut lumber storage. After 1915, the Property has been used for the manufacturing of cattle feed, refrigerants, and specialty chemicals. Arsenical based agricultural herbicides were manufactured on the Property from 1957 to 1977. A byproduct of the manufacturing of this herbicide was a salt that contained approximately 2 percent arsenic by weight and was stockpiled at several locations on the Property and subsequently entered soil and groundwater. By 1978, production of arsenical based herbicides ceased and, since 1983, the Property has been used to produce fire extinguishers and fire suppression systems. ChemDesign leases a portion of the Property from Tyco and ChemDesign conducts chemical toll manufacturing services on the Property. Additional background and details on the Property can be obtained in the 2022 Barrier Wall Groundwater Monitoring Report (Jacobs 2023). |
| D. | Description of identified contaminants and the source(s) and whether contaminant concentrations exceed NR 720 Residual Contaminant Levels. | The following contaminant types are known to be present at the Property at concentrations above applicable soil and/or groundwater standards (where applicable): RCRA metals: primarily arsenic and in some areas low level mercury |

Volatile Organic Compounds (VOCs): benzene, ethylbenzene, naphthalene, toluene, xylenes, chlorobenzene, chloromethane, 1,2dichlorobenzene, 1,4-dichlorobenzene, 1,2dichloroethane, cis-1,2-dichloroethene, methylene chloride, trichloroethene, vinyl chloride, acetone, 4-methyl-2-pentanone Per- and polyfluoroalkyl substances (PFAS) Limited to no semi-volatile organic compounds (SVOCs) Recent waste soil sample analytical laboratory report for the ChemDesign Proposed Work is included in Attachment 2. A Single, aggregate sample was collected on E. Description of the sampling activities September 15, 2023, from the approximate conducted to characterize the material locations the trench boxes which will be placed at including where the samples were collected. the tie-in points for the ChemDesign Proposed how sample locations were chosen, the Work (to connect water service line to a sampling methods used, and when sampling ChemDesign building). Samples were collected activities were conducted. with a hand auger at 4 feet and 7 feet of depth below grade at the approximate center of each proposed trench box that will facilitate the underground boring see Attachment 3. All fourcollection point samples were aggregated in a clean stainless-steel bowl and mixed. Single samples for each method of analysis were collected in the appropriate bottles and sent to Pace Analytical Services, LLC. F. Explain how the sampling activities Sampling activities were conducted per the adequately characterized the contaminated approved site Quality Assurance Project Plans and soil or other solid waste proposed to be Standard Operating Procedures. Samples were managed. Indicate whether the samples were collected at the approximate center point of each analyzed for all contaminants previously trench box which represents the fixed connection identified at the generating site or facility points for the water line tie-ins. Samples were and analyzed for all contaminants potentially analyzed for toxicity characteristic leaching present at the site or facility considering procedure (SW846 1311) for RCRA metals current and historic land use. Discuss how (SW846 6010D and SW846 7470), VOCs (SW846 samples were collected from areas most 8260), and SVOCs (SW846 8270E) and also analyzed for PFAS substances (EPA 537 modified) likely to be contaminated and from material that will actually be managed under this as previously identified present contaminants at the site. request. G. Total number of samples collected from this A single (one) aggregate sample was collected. material and analyzed for contaminants of concern. Approximately 1 sample per 85 yd³ of material H. Rate of sample collection per volume. was sampled. This is based on the rate

recommended in NR 718.12 (1) (e)¹. An alternative sampling plan was not submitted.

4.0 Project Description/Materials Management

Describe how the contaminated materials will be managed, the proposed schedule for managing the material, and provide sufficient information to justify that the placement of the contaminated materials will meet the requirements of NR 726.12 (1) (b) 1. to 5.

A. Describe the material management activities to take place. Provide details on how and where the material will be generated, transported, and placed. Describe the depth of the proposed excavation of contaminated soil or other solid waste, and the depth that it will be placed at the receiving site or facility. Describe any response actions proposed for the receiving site or facility to address the relocated contaminated material (such as the construction of a cap). Discuss how material management activities will fit in with the overall property remediation and/or redevelopment plans.

Horizontal directional drilling will be used to install the six-inch water line. At each end of the water line to be connected, a small trench box will be installed to facilitate the boring. An excavator will be used to dig soils and two separate impermeable barriers to temporarily stockpile soils will be used at each end for the proposed water line. One for the clean six-inch topsoil and a separate barrier for the contaminated materials. This is expected to produce 30 cubic yards at each end of the line which will then be reused as backfill to complete the activity. Should the excavation take an additional day, an impermeable top barrier along with silt tenting will be applied to the contaminated piles overnight.

Once both trench boxes are set, horizontal directional drilling will be used to install approximately 72 feet of the six-inch ductile line. The depth of the trench boxes and water line to be installed is approximately six feet below grade. The drilling is estimated to produce 25 cubic yards of soil and bentonite slurry which will be captured with a hydro-vac truck. The hydo-vac truck will not leave the property and transport the material approximately 200 yards to lined soil boxes provided by Waste Management. The material will be solidified with saw dust within the soil boxes prior to transfer.

The soil boxes will be profiled as non-hazardous waste and sent to the Waste Management Landfill in Arlington, Oregon.

If dewatering is required as part of subsurface activities, groundwater will be collected in container(s) and will be disposed of offsite through Waste Management in Vicory, Illinois.

Once the water line has been installed, the contaminated soils will be placed back into the excavation site, all geo-fabric materials

¹ NR 718.12 (1) (e) requires that samples collected to characterize soil be collected at a rate of one sample per 100 cubic yards (for the first 600 cubic yards) and one sample for each additional 300 cubic yards of material, with a minimum of two samples.

| | | encountered during the excavation will be replaced. To complete, the six inches of topsoil will be re-installed, and the site will be re-seeded with grass seed. Any excess soil will be placed in the soil boxes from the directional drilling for offsite disposal. |
|----|---|---|
| В. | Summarize the proposed schedule for implementation of the activities including anticipated start and end dates. | ChemDesign anticipates starting the new water line work in spring 2024 and is anticipated to take 1 to 2 days to complete. |
| C. | Confirm the proposed management activities will comply with NR 726.13 (1) (b) 1. through 5. | The Property owner is subject to an AOC and the RCRA remedy components are in place and under monitoring and operations and maintenance. The ChemDesign Proposed Work will not change or impact the effectiveness of the RCRA remedy components. The small cover area intersected during the work will be reinstalled pursuant to the 2010 Cover Operation and Maintenance Plan submitted by Tyco and approved by the EPA under the AOC. Materials taken offsite for disposal will be disposed of at the Waste Management Landfill, located in Arlington, Oregon. |
| D. | Describe any procedures that have been established, or methods that will be used, to identify previously undocumented contamination during the completion of this project (such as instrument field screening, visual inspections, etc.). Also describe any contingency procedures that have been established to address unexpected contamination. | If materials not previously known to be present are encountered, the WDNR will be notified and these materials will be analyzed as necessary for offsite disposal. Unexpected subsurface conditions could include, but not limited to, the following: Drums, underground storage tanks, piping, sumps, etc. Suspect regulated materials (e.g., suspect asbestos containing debris) Significant uncharted utilities or subsurface obstructions/features |
| E. | Summarize how the proposed management activities will prevent or minimize adverse environmental impacts and potential threats to human health and welfare, including worker safety, by assessing how all potential exposure and migration pathways of concern, including direct contact exposure, vapor intrusion, ground water, surface water, sediment and any other relevant pathway will be addressed by the proposed management. | See Section 6.0 Location Criteria Exemption Request in Attachment 1 for additional details. |

5.0 Receiving Site or Facility Information

Describe the site or facility receiving the material.

Contaminated soils at the Tyco site will either be reused onsite, as previously approved by WDNR and EPA, or sent offsite to an appropriate disposal facility. Soils are not planned to be brought to another receiving site or facility. Contaminated soil generated from the Property are planned to be disposed of at the Waste Management Landfill located in Arlington, Oregon.

6.0 Locational Criteria Exemption Request

Indicate if excavated contaminated soil will be stored in any of the following locations:

| Within a floodplain | Yes, see attached Property Figures (Attachment 4, Fig. 2) |
|---|--|
| Within 100 feet of any wetland or critical habitat area | Yes, WDNR mapped wetlands on the eastern edge of the Property as shown in attached Property Figures (Attachment 4, Fig. 3) |
| Within 300 feet of any navigable river, stream, lake, pond, or flowage | Yes, Menominee River adjacent to the north edge of the Property, see attached Property Figures (Attachment 4, Fig. 1-3) |
| Within 100 feet of any on-site water supply well or 300 feet of any off-site water supply well | No |
| Within three (3) feet of the high groundwater level | Yes, groundwater ranges from approximately 1 to 5 feet below the ground surface (Attachment 1, Section Geologic and Hydrogeologic Characteristics) |
| At a depth greater than the depth of the original excavation from which the contaminated soil was removed | No |

Provide the justification for exempting the proposed soil management activity from the indicated criteria as described below.

Explain below why granting an exception to the NR 718.12 (1) (c) location criteria will not cause a threat to public health, safety, welfare, and the environment by assessing how all potential exposure and migration pathways of concern (including direct contact exposure, vapor intrusion, groundwater, surface water, sediment, and any other relevant pathway) will be addressed by the proposed management. Consider the quantity and characteristics of the waste being managed, the geologic and hydrogeological characteristics of the receiving site, the unavailability of other environmentally suitable alternatives, and whether the activities will comply with other state and federal regulations including other portions of NR 700 to NR 754.

The reuse of excavated soil as backfill will not cause a threat to public health, safety, welfare and the environment. The primary exposure pathways for the backfilled soil will be direct contact, vapor intrusion and groundwater. Potential for direct contact with the soil will be addressed by placing geo-fabric and 6-inches of topsoil over the backfilled soil at the conclusion of the work. Based on the constituents and the relatively low concentrations of the detected VOCs, the vapor intrusion pathway is not considered viable. Finally, the groundwater pathway is addressed through an existing barrier wall and groundwater collection and treatment system at the site which was installed pursuant to the AOC, as the area where the soil will be backfilled is within the barrier wall.

ChemDesign is requesting an exemption from the NR 718.12 (1) (c) location standard requirements so that contaminated soil can be reused as backfill on the Property, as allowed in NR 718.12 (1) (d). The soil will be backfilled within the general area from which it is excavated and will remain onsite. It is anticipated that the stockpiled soil will be backfilled or containerized within approximately one to two days, but less than fifteen (15) days.

This MMP will provide procedures to properly manage contaminated soil on the Property. Additional details are provided in Attachment 1.

7.0 Continuing Obligations at Receiving Site or Facility

Indicate which continuing obligations will be specifically required to address the material being managed on the receiving site or facility.

Not applicable. The receiving site or facility for contaminated soil and materials from Tyco would be a permitted facility, see Section 5.0 Receiving Site or Facility Information, subject to the permitted facility closure requirements.

8.0 Attachments

Attachment 1- Location Standard Exemption Request Details

Attachment 2 - Analytical laboratory report for recent waste characterization activities

Attachment 3 – Proposed Work Site Plan with RCRA Components and ChemDesign's Proposed Water Line

Attachment 4 – Property Figures

- a. Figure 1 Property Map
- b. Figure 2 FEMA Flood Insurance Rate Map
- c. Figure 3 Marinette County Map with parcels, 100-year flood plain and WDNR mapped wetlands

9.0 Certification Statement

"I, Jeffrey H. Danko, hereby certify that I am a registered professional geologist in the State of Wisconsin, registered in accordance with the requirements of ch. GHSS 2, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. GHSS 5, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code."

| Malle | WI-111 | |
|-------------------------------------|--------|--|
| Jeffrey Danko, PG Senior Consultant | P.G. # | |

Attachment 1

Waste Characteristics and Quantities

Soil excavation activities are anticipated within areas where RCRA metal, VOC, and PFAS impacted soil will be encountered. Contaminated material would consist primarily of fill materials, native soil, and occasional debris. Fill and underlying native materials are described in the following Section. Subsurface activities will include, but are not limited to, stripping of topsoil, excavation, and horizontal drilling to install a water line, and replacement of the soil and topsoil (and geo-fabric cover, where required). Quantities of soil for removal are approximately 85 cubic yards (yd³), up to 60 yd³ of which may be reused onsite as backfill material. Soil and groundwater have been characterized through historical investigations and laboratory analytical results, and Tyco currently has approved waste profiles for disposal of both soil and groundwater. The recent waste soil sample analytical laboratory report is included in Attachment A-1.

Geologic and Hydrogeologic Characteristics

The Property Owner, Tyco, has provided the following information. Geology at the Property consists of an upper soil layer consisting of sand/gravel fill. Based on historical documentation, the fill material has been placed on the Property periodically for over 100 years of various operations. Beneath the fill layer is loose to medium dense alluvial deposits consisting of fine- to coarse-grained sand and gravel. Some of these alluvial deposits consist of an organic-rich, fine-grained peat material. Underlying the alluvial stratigraphy is a layer of dense silty sand to sandy silt that transitions to an even denser sandy silt and clay-compacted glacial till deposit. Below this is dolomitic bedrock at approximately 40 feet below ground surface (bgs).

Groundwater, when encountered at the Property, has typically been present between 3 and 5 feet bgs, but depending on Property conditions can approach 1-foot bgs in some areas. Regional groundwater flow beneath the Property is generally northeast toward the Menominee River. Noted variations in historical groundwater flow (before construction of the barrier wall) were observed in the northwestern portion of the Property: groundwater flow was from the southeast toward the northwest, likely the result of a filled-in slip that is present along the western border of the Property. Other local preferential pathways of migration may be present at the Property. The direction of groundwater flow is affected near the Property because of the presence of the vertical barrier wall (that contains groundwater at the Property), which was completed in fall 2010. Regional groundwater flow outside the Property likely remains generally toward the Menominee River but is diverted around the barrier wall directly south of the Property.

VOCs and total arsenic are monitored as part of the barrier wall groundwater monitoring plan activities per the 2015 Revised Barrier Wall Groundwater Monitoring Plan Update (BWGMPU; CH2M 2015) and June 24, 2019, Addendum to 2015 Revised Barrier Wall Groundwater Monitoring Plan Update (Jacobs 2019 submitted to the EPA and WDNR). Concentrations were reported at levels exceeding their respective NR 140 preventative action limits (PALs) and/or NR 140 enforcement standards (ESs).

Groundwater on the Property is relatively shallow and is contained by the barrier wall and treated by the groundwater treatment system. Property groundwater levels within the containment barrier walls are also maintained by a groundwater treatment system. As a result, storage of impacted soil/fill will not have any additional impact on groundwater quality at the Property. If dewatering is required as part of subsurface activities, groundwater will be collected in containers and will be disposed of offsite.

Unavailability of Environmentally Suitable Alternatives

The corrective measures conducted at the Property by Tyco, as required in the AOC, included components to address historical impacts at the Property and be protective of human health and the environment. The main component consisted of onsite groundwater management, which includes the containment barrier wall, engineered groundwater collection and treatment system, and a phyto-pumping system. We believe it would be less protective of the environment to move contaminated soil from the Property for offsite disposal. The Property is already contained and monitored and has restricted access and 24-hour security; therefore, reuse of the excavated soil as

backfill material is a practical and environmentally suitable option with this MMP in place to provide procedures to properly manage contaminated soil.

Compliance with Other State and Federal Regulations

Soil management will follow other state and federal regulations. Contaminated soil would also be managed in accordance with stormwater requirements and other NR 718 requirements. Soil will be managed per the MMP that includes proper erosion control (to prevent the potential runoff or surface migration of contaminants during subsurface activities) and other measures to be implemented at the Property, designed to be protective of human health and the environment.

The approval of Tyco, EPA, and WDNR will be required before the proposed work can begin due to the small disturbance of the cover area of the existing corrective measures required by the AOC.

Public Health, Safety, or Welfare or the Environment

If this exemption is not granted, excavated soil would have to be transported and stored offsite for disposal, which we believe elevates potential environmental risk and risk to the community. If this exemption is granted, a portion of the soil can be reused as backfill material for the excavation, thus reducing the potential environmental risk and risk to the community. The Property already has RCRA AOC corrective measures in place with monitoring requirements. The Property has restricted access and 24-hour security to keep the public away from stored contaminated soil. The proposed soil handling and onsite storage procedures do not pose an unacceptable threat to public health, safety, welfare, or the environment, including worker safety. Potential exposure and migration pathways of concern are addressed below.

Vapor Intrusion

Identified contamination associated with groundwater and soil may consist of VOCs, SVOCs, metals, and PFAS. The metals, SVOCs, and PFAS constituents do not pose a threat to human health or safety from vapor migration to underlying soils. TCLP VOC concentrations were not detected in the samples subjected to laboratory analysis. Storage and stockpiling of contaminated soils managed in accordance with the MMP are not expected to provide a complete pathway for vapor intrusion. Soils will also be placed back in the same area from which they were removed. Therefore, a vapor intrusion risk is not expected.

Sediment/Surface Water

Storm water discharge at the Property is regulated by the WPDES Industrial Stormwater General Permit; coverage under the Construction Stormwater General Permit would be obtained if applicable. Appropriate storm water and erosion control measures will be put in place prior to subsurface activities to minimize erosion and storm water runoff. To prevent tracking of soil on and off the Property, access areas will be made clear for loading trucks/containers and trucks/containers and equipment will be cleaned of soil prior to leaving the area. As practicable, the weather forecast shall be used to schedule subsurface activities to minimize the potential for significant storm water accumulation. However, potentially impacted groundwater and storm water may accumulate in areas requiring removal. Impacted liquids will be collected and disposed offsite or treated at the groundwater treatment system.

Air Quality

Contaminated soil piles will be covered when not actively being managed, limiting volatilization of residual VOCs. Subsurface activities will include best management practices to limit particulate emissions. Contractors will be required to adequately wet soil during dry periods to prevent dust emissions.

Direct Contact Exposure

The direct contact pathway will be protected by constructing a barrier, such as barricade tape or temporary fencing, for storage areas that are accessible to unauthorized workers and visitors. The contractor performing subsurface activities will evaluate potential health and safety hazards for their workers from potential exposure to contaminants in soil, sediment, buried waste, or groundwater while performing these activities and prepare an

activity-specific plan to address these hazards. The plan must include the appropriate level of monitoring and personal protective equipment identified by the contractor based on known conditions. However, if actual conditions vary from expected hazards based on field observations, the contractor must stop work. The activity-specific plan should be reevaluated and updated by the contractor when appropriate. Workers that may come into contact with impacted soil must be informed of possible contaminant concentrations that may be encountered and must be properly trained in the handling of the soil by the contractor. In addition, based on the tasks that workers perform and whether they come in contact with groundwater, the contractor must determine if their staff have the required training.

At the conclusion of the proposed construction activities, all areas where excavated soil are used for backfill will be covered with either 6-inches of clean topsoil or, for the cover areas, geo-fabric and clean topsoil, limiting the potential for direct contact by site personnel.

Groundwater Quality/Water Supply

Groundwater at this Property is impacted from historical activities and has detections above the NR 140 PALs and ESs. Groundwater is addressed by the barrier wall and an active groundwater collection and treatment system. Groundwater and liquids encountered in construction activities will be disposed of offsite. Surface water controls will be implemented by the contractor to prevent surface runoff that could result in surface water contact with the soil and groundwater, including the construction of berms if necessary. Any water which has been in contact with contaminated soil or groundwater shall be contained and may be replaced in the storage pile or shall be collected and sent offsite for disposal. There are no water supply wells within 300 feet of the Property, only groundwater monitoring and extraction wells associated with the corrective measures.

Attachment 2





October 09, 2023

Matthew Smiley ChemDesign Products Inc 2 Stanton St Marinette, WI 54143

RE: Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Dear Matthew Smiley:

Enclosed are the analytical results for sample(s) received by the laboratory on September 20, 2023. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services Green Bay
- Pace Analytical Services Minneapolis

If you have any questions concerning this report, please feel free to contact me.

Sincerely

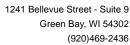
Angela Lane angela.lane@pacelabs.com (920)469-2436

Project Manager

Enclosures

cc: Tom Willis, ChemDesign Products Inc







CERTIFICATIONS

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Pace Analytical Services, LLC - Minneapolis MN

1700 Elm Street SE, Minneapolis, MN 55414

A2LA Certification #: 2926.01 Alabama Certification #: 40770

Alaska Contaminated Sites Certification #: 17-009

Alaska DW Certification #: MN00064 Arizona Certification #: AZ0014 Arkansas DW Certification #: MN00064 Arkansas WW Certification #: 88-0680 California Certification #: 2929 Colorado Certification #: MN00064

Connecticut Certification #: PH-0256

EPA Region 8 Tribal Water Systems+Wyoming DW

Certification #: via MN 027-053-137 Florida Certification #: E87605 Georgia Certification #: 959 GMP+ Certification #: GMP050884 Hawaii Certification #: MN00064 Idaho Certification #: MN00064 Illinois Certification #: 200011 Indiana Certification #: C-MN-01 Iowa Certification #: 368 Kansas Certification #: E-10167 Kentucky DW Certification #: 90062 Kentucky WW Certification #: 90062 Louisiana DEQ Certification #: AI-03086 Louisiana DW Certification #: MN00064

Maine Certification #: MN00064 Maryland Certification #: 322 Michigan Certification #: 9909 Minnesota Certification #: 027-053-137

Minnesota Dept of Ag Approval: via MN 027-053-137

Minnesota Petrofund Registration #: 1240

Mississippi Certification #: MN00064 Missouri Certification #: 10100 Montana Certification #: CERT0092 Nebraska Certification #: NE-OS-18-06 Nevada Certification #: MN00064 New Hampshire Certification #: 2081 New Jersey Certification #: MN002 New York Certification #: 11647

North Carolina DW Certification #: 27700 North Carolina WW Certification #: 530 North Dakota Certification (A2LA) #: R-036 North Dakota Certification (MN) #: R-036

Ohio DW Certification #: 41244 Ohio VAP Certification (1700) #: CL101

Oklahoma Certification #: 9507

Oregon Primary Certification #: MN300001 Oregon Secondary Certification #: MN200001 Pennsylvania Certification #: 68-00563 Puerto Rico Certification #: MN00064 South Carolina Certification #:74003001 Tennessee Certification #: TN02818 Texas Certification #: T104704192 Utah Certification #: MN00064 Vermont Certification #: VT-027053137 Virginia Certification #: 460163 Washington Certification #: C486 West Virginia DEP Certification #: 382 West Virginia DW Certification #: 9952 C

Wyoming UST Certification #: via A2LA 2926.01

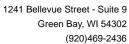
USDA Permit #: P330-19-00208

Wisconsin Certification #: 999407970

Pace Analytical Services Green Bay

1241 Bellevue Street, Green Bay, WI 54302 Florida/NELAP Certification #: E87948 Illinois Certification #: 200050 Kentucky UST Certification #: 82 Louisiana Certification #: 04168 Minnesota Certification #: 055-999-334 New York Certification #: 12064 North Dakota Certification #: R-150

South Carolina Certification #: 83006001 Texas Certification #: T104704529-21-8 Virginia VELAP Certification ID: 11873 Wisconsin Certification #: 405132750 Wisconsin DATCP Certification #: 105-444 USDA Soil Permit #: P330-21-00008 Federal Fish & Wildlife Permit #: 51774A





SAMPLE SUMMARY

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

| Lab ID | Sample ID | Matrix | Date Collected | Date Received |
|-------------|-------------------|--------|----------------|----------------|
| 40268330001 | 91520 TCLP & PFAs | Solid | 09/15/23 12:00 | 09/20/23 09:45 |



Green Bay, WI 54302 (920)469-2436

SAMPLE ANALYTE COUNT

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

| Lab ID | Sample ID | Method | Analysts | Analytes Reported | Laboratory |
|-------------|-------------------|-------------------|----------|----------------------|------------|
| 40268330001 | 91520 TCLP & PFAs | EPA 6010D | SIS | 7 | PASI-G |
| | | EPA 7470 | YER | 1 | PASI-G |
| | | ASTM D2974 | JDL | 1 | PASI-M |
| | | EPA 8270E | RJN | 16 | PASI-G |
| | | EPA 8260 | CXJ | 13 | PASI-G |
| | | ENV-SOP-MIN4-0178 | NF1 | 58 | PASI-M |

PASI-G = Pace Analytical Services - Green Bay PASI-M = Pace Analytical Services - Minneapolis



ANALYTICAL RESULTS

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

Sample: 91520 TCLP & PFAs Lab ID: 40268330001 Collected: 09/15/23 12:00 Received: 09/20/23 09:45 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

| Parameters | Results | Units | LOQ | LOD | DF | Prepared | Analyzed | CAS No. | Qua | | |
|-------------------------------|---|--|-----------------|-------------|--------|-------------------|----------------|------------|-----|--|--|
| 6010D MET ICP, TCLP | Analytical | Method: EPA | A 6010D Prepa | aration Met | hod: E | PA 3015A | | | | | |
| | Leachate Method/Date: EPA 1311; 09/25/23 14:50 | | | | | | | | | | |
| | | | es - Green Bay | | | | | | | | |
| Arsenic | 0.15 | mg/L | 0.050 | 0.017 | 2 | 09/26/23 10:40 | 09/27/23 13:26 | 7440-38-2 | | | |
| Barium | 0.32 | mg/L | 0.010 | 0.0030 | 2 | 09/26/23 10:40 | 09/27/23 13:26 | 7440-39-3 | | | |
| Cadmium | 0.0079J | mg/L | 0.010 | 0.0027 | 2 | 09/26/23 10:40 | 09/27/23 13:26 | 7440-43-9 | D3 | | |
| Chromium | <0.0051 | mg/L | 0.020 | 0.0051 | 2 | 09/26/23 10:40 | 09/27/23 13:26 | 7440-47-3 | D3 | | |
| Lead | 0.055 | mg/L | 0.040 | 0.012 | 2 | 09/26/23 10:40 | 09/27/23 13:26 | 7439-92-1 | | | |
| Selenium | <0.024 | mg/L | 0.080 | 0.024 | 2 | 09/26/23 10:40 | 09/27/23 13:26 | 7782-49-2 | D3 | | |
| Silver | <0.0064 | mg/L | 0.020 | 0.0064 | 2 | 09/26/23 10:40 | 09/27/23 13:26 | 7440-22-4 | D3 | | |
| 7470 Mercury, TCLP | Analytical | Method: EPA | A 7470 Prepar | ation Metho | od: EP | A 7470 | | | | | |
| | Leachate I | Method/Date | e: EPA 1311; 09 | 9/25/23 14: | 50 | | | | | | |
| | | | es - Green Bay | | | | | | | | |
| Mercury | <0.066 | ug/L | 0.20 | 0.066 | 1 | 09/27/23 13:01 | 09/28/23 06:55 | 7439-97-6 | | | |
| Dry Weight / %M by ASTM D2974 | Analytical | Method: AS | ΓM D2974 | | | | | | | | |
| | Pace Analy | Pace Analytical Services - Minneapolis | | | | | | | | | |
| Percent Moisture | 16.6 | % | 0.10 | 0.10 | 1 | | 10/06/23 13:07 | | N2 | | |
| 3270E MSSV TCLP Sep Funnel | Analytical Method: EPA 8270E Preparation Method: EPA 3510 | | | | | | | | | | |
| | Leachate Method/Date: EPA 1311; 09/25/23 14:50 | | | | | | | | | | |
| | Pace Anal | ytical Service | es - Green Bay | / | | | | | | | |
| 1,4-Dichlorobenzene | <17.8 | ug/L | 50.0 | 17.8 | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 106-46-7 | | | |
| 2,4-Dinitrotoluene | <11.9 | ug/L | 50.0 | 11.9 | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 121-14-2 | | | |
| Hexachloro-1,3-butadiene | <16.4 | ug/L | 50.0 | 16.4 | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 87-68-3 | | | |
| Hexachlorobenzene | <25.2 | ug/L | 100 | 25.2 | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 118-74-1 | | | |
| Hexachloroethane | <15.1 | ug/L | 50.0 | 15.1 | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 67-72-1 | | | |
| 2-Methylphenol(o-Cresol) | <7.7 | ug/L | 50.0 | 7.7 | 1 | 09/26/23 10:07 | | 95-48-7 | | | |
| 3&4-Methylphenol(m&p Cresol) | <6.0 | ug/L | 50.0 | 6.0 | 1 | 09/26/23 10:07 | 09/27/23 10:57 | | | | |
| Nitrobenzene | <15.7 | ug/L | 50.0 | 15.7 | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 98-95-3 | | | |
| Pentachlorophenol | <16.3 | ug/L | 50.0 | 16.3 | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 87-86-5 | | | |
| Pyridine | <73.0 | ug/L | 100 | 73.0 | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 110-86-1 | | | |
| 2,4,5-Trichlorophenol | <18.2 | ug/L | 50.0 | 18.2 | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 95-95-4 | | | |
| 2,4,6-Trichlorophenol | <20.0 | ug/L | 50.0 | 20.0 | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 88-06-2 | | | |
| Surrogates | | | | | | | | | | | |
| Nitrobenzene-d5 (S) | 73 | % | 38-130 | | 1 | | 09/27/23 10:57 | | | | |
| 2-Fluorobiphenyl (S) | 51 | % | 23-130 | | 1 | | 09/27/23 10:57 | | | | |
| 2,4,6-Tribromophenol (S) | 46 | % | 10-141 | | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 118-79-6 | | | |
| Phenol-d6 (S) | 19 | % | 11-130 | | 1 | 09/26/23 10:07 | 09/27/23 10:57 | 13127-88-3 | | | |
| 8260 MSV TCLP | Analytical | Method: EPA | A 8260 Leacha | ate Method | /Date: | EPA 1311; 09/21/2 | 23 13:35 | | | | |
| | Pace Analy | ytical Service | es - Green Bay | / | | | | | | | |
| Benzene | <3.0 | ug/L | 10.0 | 3.0 | 10 | | 09/25/23 11:35 | 71-43-2 | | | |
| 2-Butanone (MEK) | <65.2 | ug/L | 250 | 65.2 | 10 | | 09/25/23 11:35 | 78-93-3 | | | |



ANALYTICAL RESULTS

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

Sample: 91520 TCLP & PFAs Lab ID: 40268330001 Collected: 09/15/23 12:00 Received: 09/20/23 09:45 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

| Parameters | Results | Units | LOQ | LOD | DF | Prepared | Analyzed | CAS No. | Qual |
|------------------------------|------------|----------------|---------------|------------|--------|-------------------|----------------|-------------|------|
| 8260 MSV TCLP | Analytical | Method: EPA | A 8260 Leach | ate Method | /Date: | EPA 1311; 09/21/2 | 23 13:35 | | |
| | Pace Anal | ytical Service | es - Green Ba | y | | | | | |
| Carbon tetrachloride | <3.7 | ug/L | 10.0 | 3.7 | 10 | | 09/25/23 11:35 | 56-23-5 | |
| Chlorobenzene | <8.6 | ug/L | 10.0 | 8.6 | 10 | | 09/25/23 11:35 | 108-90-7 | |
| Chloroform | <5.0 | ug/L | 50.0 | 5.0 | 10 | | 09/25/23 11:35 | 67-66-3 | |
| 1,2-Dichloroethane | <2.9 | ug/L | 10.0 | 2.9 | 10 | | 09/25/23 11:35 | 107-06-2 | |
| 1,1-Dichloroethene | <5.8 | ug/L | 10.0 | 5.8 | 10 | | 09/25/23 11:35 | 75-35-4 | |
| Tetrachloroethene | <4.1 | ug/L | 10.0 | 4.1 | 10 | | 09/25/23 11:35 | 127-18-4 | |
| Trichloroethene | <3.2 | ug/L | 10.0 | 3.2 | 10 | | 09/25/23 11:35 | 79-01-6 | |
| Vinyl chloride | <1.7 | ug/L | 10.0 | 1.7 | 10 | | 09/25/23 11:35 | 75-01-4 | |
| Surrogates | | 3 | | | | | | | |
| Toluene-d8 (S) | 100 | % | 70-130 | | 10 | | 09/25/23 11:35 | 2037-26-5 | |
| 4-Bromofluorobenzene (S) | 99 | % | 70-130 | | 10 | | 09/25/23 11:35 | 460-00-4 | |
| 1,2-Dichlorobenzene-d4 (S) | 103 | % | 70-130 | | 10 | | 09/25/23 11:35 | 2199-69-1 | |
| WI ID SL | Analytical | Method: EN | V-SOP-MIN4- | 0178 Prepa | ration | Method: ENV-SO | P-MIN4-0178 | | |
| | Pace Anal | ytical Service | es - Minneapo | lis | | | | | |
| 11CI-PF3OUdS | <0.030 | ug/kg | 0.11 | 0.030 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 763051-92-9 | |
| 4:2 FTS | <0.028 | ug/kg | 0.11 | 0.028 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 757124-72-4 | |
| 6:2 FTS | 1.3 | ug/kg | 0.11 | 0.050 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 27619-97-2 | |
| 8:2 FTS | 0.14 | ug/kg | 0.12 | 0.053 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 39108-34-4 | |
| 9CI-PF3ONS | < 0.030 | ug/kg | 0.11 | 0.030 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 756426-58-1 | |
| ADONA | < 0.043 | ug/kg | 0.11 | 0.043 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 919005-14-4 | |
| HFPO-DA | < 0.033 | ug/kg | 0.12 | 0.033 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 13252-13-6 | |
| NEtFOSAA | <0.048 | ug/kg | 0.12 | 0.048 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 2991-50-6 | |
| NEtFOSA | <0.031 | ug/kg | 0.12 | 0.031 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 4151-50-2 | |
| NEtFOSE | < 0.039 | ug/kg | 0.12 | 0.039 | 1 | 09/27/23 09:20 | | | |
| NMeFOSAA | < 0.034 | ug/kg | 0.12 | 0.034 | 1 | 09/27/23 09:20 | | | |
| NMeFOSA | < 0.033 | ug/kg | 0.12 | 0.033 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 31506-32-8 | |
| NMeFOSE | < 0.036 | ug/kg | 0.12 | 0.036 | 1 | 09/27/23 09:20 | | | |
| Perfluorobutanesulfonic acid | <0.031 | ug/kg | 0.11 | 0.031 | 1 | 09/27/23 09:20 | | 375-73-5 | |
| Perfluorodecanoic acid | 1.0 | ug/kg | 0.12 | 0.027 | 1 | | 09/28/23 21:24 | | |
| Perfluorohexanoic acid | 2.7 | ug/kg | 0.12 | 0.033 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 307-24-4 | |
| PFBA | 1.4 | ug/kg | 0.12 | 0.034 | 1 | 09/27/23 09:20 | | | |
| PFDS | < 0.034 | ug/kg | 0.12 | 0.034 | 1 | 09/27/23 09:20 | | | |
| PFDoS | <0.031 | ug/kg | 0.12 | 0.031 | 1 | 09/27/23 09:20 | | | |
| PFHpS | < 0.033 | ug/kg | 0.11 | 0.033 | 1 | 09/27/23 09:20 | | | |
| PFNS | <0.042 | ug/kg | 0.11 | 0.042 | 1 | 09/27/23 09:20 | | | |
| PFOSA | <0.035 | ug/kg | 0.12 | 0.035 | 1 | | 09/28/23 21:24 | | |
| PFPeA | 4.6 | ug/kg | 0.12 | 0.034 | 1 | | 09/28/23 21:24 | | |
| PFPeS | <0.029 | ug/kg | 0.11 | 0.029 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | | |
| Perfluorododecanoic acid | 0.16 | ug/kg | 0.12 | 0.039 | 1 | 09/27/23 09:20 | | | |
| Perfluoroheptanoic acid | 2.9 | ug/kg | 0.12 | 0.042 | 1 | 09/27/23 09:20 | | | |
| Perfluorohexanesulfonic acid | 0.046J | ug/kg ug/kg | 0.12 | 0.026 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | | В |
| Perfluorononanoic acid | 4.0 | ug/kg ug/kg | 0.12 | 0.037 | 1 | 09/27/23 09:20 | | | _ |
| Perfluorooctanesulfonic acid | 0.62 | ug/kg ug/kg | 0.12 | 0.035 | 1 | 09/27/23 09:20 | | | В |
| remuoroocianesulionic acid | 0.02 | ug/kg | 0.11 | 0.035 | ı | 09/21/23 09:20 | 09/20/23 21:24 | 1703-23-1 | ט |



ANALYTICAL RESULTS

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

Sample: 91520 TCLP & PFAs Lab ID: 40268330001 Collected: 09/15/23 12:00 Received: 09/20/23 09:45 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

| Parameters | Results | Units | LOQ | LOD | DF | Prepared | Analyzed | CAS No. | Qual |
|-----------------------------|------------|----------------|---------------|------------|---------|----------------|----------------|------------|------|
| WI ID SL | Analytical | Method: EN | V-SOP-MIN4- | 0178 Prepa | aration | Method: ENV-SO | P-MIN4-0178 | | |
| | Pace Anal | ytical Service | es - Minneapo | olis | | | | | |
| Perfluorooctanoic acid | 1.8 | ug/kg | 0.12 | 0.037 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 335-67-1 | |
| Perfluorotetradecanoic acid | <0.041 | ug/kg | 0.12 | 0.041 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 376-06-7 | |
| Perfluorotridecanoic acid | 0.065J | ug/kg | 0.12 | 0.038 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 72629-94-8 | |
| Perfluoroundecanoic acid | 0.95 | ug/kg | 0.12 | 0.036 | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 2058-94-8 | |
| Surrogates | | | | | | | | | |
| 13C2-PFDoA (S) | 75 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | | |
| 13C2-PFTA (S) | 69 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | | |
| 13C24:2FTS (S) | 76 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | | |
| 13C26:2FTS (S) | 131 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | | |
| 13C28:2FTS (S) | 176 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | | S0 |
| 13C2PFHxDA (S) | 63 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | | |
| 13C3-PFBS (S) | 74 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 375-73-5 | |
| 13C3-PFHxS (S) | 75 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 355-46-4 | |
| 13C3HFPO-DA (S) | 43 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | | |
| 13C4-PFBA (S) | 82 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 375-22-4 | |
| 13C4-PFHpA (S) | 73 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 375-85-9 | |
| 13C5-PFHxA (S) | 74 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 307-24-4 | |
| 13C5-PFPeA (S) | 75 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 2706-90-3 | |
| 13C6-PFDA (S) | 77 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 335-76-2 | |
| 13C7-PFUdA (S) | 73 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 2058-94-8 | |
| 13C8-PFOA (S) | 71 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 335-67-1 | |
| 13C8-PFOS (S) | 84 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 1763-23-1 | |
| 13C8-PFOSA (S) | 67 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 754-91-6 | |
| 13C9-PFNA (S) | 69 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 375-95-1 | |
| d3-MeFOSAA (S) | 84 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 2355-31-9 | |
| d3-NMeFOSA (S) | 25 | %. | 10-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 31506-32-8 | |
| d5-EtFOSAA (S) | 88 | %. | 25-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 2991-50-6 | |
| d5-NEtFOSA (S) | 26 | %. | 10-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 4151-50-2 | |
| d7-NMeFOSE (S) | 50 | %. | 10-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 24448-09-7 | |
| d9-NEtFOSE (S) | 53 | %. | 10-150 | | 1 | 09/27/23 09:20 | 09/28/23 21:24 | 1691-99-2 | |



Project: TCLP & PFAs Testing

Pace Project No.: 40268330

QC Batch: 455937 Analysis Method: EPA 7470

QC Batch Method: EPA 7470 Analysis Description: 7470 Mercury TCLP

Laboratory: Pace Analytical Services - Green Bay

Associated Lab Samples: 40268330001

METHOD BLANK: 2618484 Matrix: Water

Associated Lab Samples: 40268330001

Blank Reporting
Parameter Units Result Limit Analyzed Qualifiers

Mercury ug/L <0.066 0.20 09/28/23 06:46

METHOD BLANK: 2617498 Matrix: Water

Associated Lab Samples: 40268330001

Blank Reporting
Parameter Units Result Limit Analyzed Qualifiers

Mercury ug/L <0.066 0.20 09/28/23 07:23

METHOD BLANK: 2617499 Matrix: Water

Associated Lab Samples: 40268330001

Blank Reporting Parameter Units Result Limit Analyzed Qualifiers

Mercury ug/L <0.066 0.20 09/28/23 07:04

LABORATORY CONTROL SAMPLE: 2618485

Date: 10/09/2023 11:00 AM

Spike LCS LCS % Rec Parameter Units Conc. Result % Rec Limits

Mercury ug/L 5 5.1 101 85-115

MATRIX SPIKE SAMPLE: 2618486

40268563001 Spike MS MS % Rec
Parameter Units Result Conc. Result % Rec Limits Qualifiers

Mercury ug/L <0.000066 mg/L 5 5.7 113 85-115

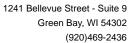
MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2618487 2618488

MS MSD 40268330001 MS MSD MS MSD Spike Spike % Rec Max Parameter Units Result Conc. Conc. Result Result % Rec % Rec Limits RPD RPD Qual Mercury ug/L < 0.066 5 5 5.3 5.5 105 110 85-115 20

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

Qualifiers





Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

| MATRIX SPIKE SAMPLE: | 2618489 | | | | | | |
|----------------------|---------|-------------|-------|--------|-------|--------|------------|
| | | 40268428001 | Spike | MS | MS | % Rec | |
| Parameter | Units | Result | Conc. | Result | % Rec | Limits | Qualifiers |
| Mercury | ug/L | <0.066 | | 5.0 | 101 | 85-115 | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

(920)469-2436



QUALITY CONTROL DATA

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

QC Batch: 455795 Analysis Method: EPA 6010D

QC Batch Method: EPA 3015A Analysis Description: 6010D MET TCLP

Laboratory: Pace Analytical Services - Green Bay

Associated Lab Samples: 40268330001

METHOD BLANK: 2617793 Matrix: Water

Associated Lab Samples: 40268330001

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|-----------|-------|-----------------|--------------------|----------------|------------|
| Arsenic | mg/L | <0.0083 | 0.025 | 09/26/23 18:31 | |
| Barium | mg/L | < 0.0015 | 0.0050 | 09/26/23 18:31 | |
| Cadmium | mg/L | < 0.0013 | 0.0050 | 09/26/23 18:31 | |
| Chromium | mg/L | < 0.0025 | 0.010 | 09/26/23 18:31 | |
| Lead | mg/L | < 0.0059 | 0.020 | 09/26/23 18:31 | |
| Selenium | mg/L | < 0.012 | 0.040 | 09/26/23 18:31 | |
| Silver | mg/L | < 0.0032 | 0.010 | 09/26/23 18:31 | |

METHOD BLANK: 2617494 Matrix: Solid

Associated Lab Samples: 40268330001

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|-----------|-------|-----------------|--------------------|----------------|------------|
| Arsenic | mg/L | < 0.0083 | 0.025 | 09/26/23 19:21 | |
| Barium | mg/L | < 0.0015 | 0.0050 | 09/26/23 19:21 | |
| Cadmium | mg/L | < 0.0013 | 0.0050 | 09/26/23 19:21 | |
| Chromium | mg/L | < 0.0025 | 0.010 | 09/26/23 19:21 | |
| Lead | mg/L | < 0.0059 | 0.020 | 09/26/23 19:21 | |
| Selenium | mg/L | < 0.012 | 0.040 | 09/26/23 19:21 | |
| Silver | mg/L | < 0.0032 | 0.010 | 09/26/23 19:21 | |

METHOD BLANK: 2617495 Matrix: Solid

Associated Lab Samples: 40268330001

Date: 10/09/2023 11:00 AM

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|-----------|-------|-----------------|--------------------|----------------|------------|
| Arsenic | mg/L | <0.0083 | 0.025 | 09/26/23 19:29 | |
| Barium | mg/L | 0.0020J | 0.0050 | 09/26/23 19:29 | |
| Cadmium | mg/L | < 0.0013 | 0.0050 | 09/26/23 19:29 | |
| Chromium | mg/L | < 0.0025 | 0.010 | 09/26/23 19:29 | |
| Lead | mg/L | < 0.0059 | 0.020 | 09/26/23 19:29 | |
| Selenium | mg/L | < 0.012 | 0.040 | 09/26/23 19:29 | |
| Silver | mg/L | < 0.0032 | 0.010 | 09/26/23 19:29 | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.



Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

METHOD BLANK: 2617496 Matrix: Solid

Associated Lab Samples: 40268330001

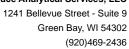
| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|-----------|-------|-----------------|--------------------|----------------|------------|
| Arsenic | mg/L | < 0.0083 | 0.025 | 09/26/23 18:47 | |
| Barium | mg/L | 0.0019J | 0.0050 | 09/26/23 18:47 | |
| Cadmium | mg/L | < 0.0013 | 0.0050 | 09/26/23 18:47 | |
| Chromium | mg/L | < 0.0025 | 0.010 | 09/26/23 18:47 | |
| Lead | mg/L | < 0.0059 | 0.020 | 09/26/23 18:47 | |
| Selenium | mg/L | < 0.012 | 0.040 | 09/26/23 18:47 | |
| Silver | mg/L | < 0.0032 | 0.010 | 09/26/23 18:47 | |

| LABORATORY CONTROL SAMPLE: | 2617794 | | | | | |
|----------------------------|---------|-------|--------|-------|--------|------------|
| | | Spike | LCS | LCS | % Rec | |
| Parameter | Units | Conc. | Result | % Rec | Limits | Qualifiers |
| Arsenic | mg/L | 0.28 | 0.27 | 97 | 80-120 | |
| Barium | mg/L | 0.28 | 0.28 | 101 | 80-120 | |
| Cadmium | mg/L | 0.28 | 0.28 | 101 | 80-120 | |
| Chromium | mg/L | 0.28 | 0.28 | 99 | 80-120 | |
| Lead | mg/L | 0.28 | 0.29 | 104 | 80-120 | |
| Selenium | mg/L | 0.28 | 0.28 | 101 | 80-120 | |
| Silver | mg/L | 0.14 | 0.14 | 99 | 80-120 | |

| MATRIX SPIKE SAMPLE: | 2617795 | | | | | | |
|----------------------|---------|-------------|-------|--------|-------|--------|------------|
| | | 40268428001 | Spike | MS | MS | % Rec | |
| Parameter | Units | Result | Conc. | Result | % Rec | Limits | Qualifiers |
| Arsenic | mg/L | <0.0083 | 0.28 | 0.27 | 97 | 75-125 | |
| Barium | mg/L | 2.5 | 0.28 | 2.8 | 98 | 75-125 | |
| Cadmium | mg/L | < 0.0013 | 0.28 | 0.28 | 102 | 75-125 | |
| Chromium | mg/L | < 0.0025 | 0.28 | 0.28 | 101 | 75-125 | |
| Lead | mg/L | < 0.0059 | 0.28 | 0.29 | 104 | 75-125 | |
| Selenium | mg/L | < 0.012 | 0.28 | 0.28 | 102 | 75-125 | |
| Silver | mg/L | 0.018 | 0.14 | 0.16 | 99 | 75-125 | |

| MATRIX SPIKE & MATRIX SF | PIKE DUPI | LICATE: 2617 | 796 | | 2617797 | , | | | | | | |
|--------------------------|-----------|--------------|-------|-------|---------|--------|-------|-------|--------|-----|-----|------|
| | | | MS | MSD | | | | | | | | |
| | | 40268493001 | Spike | Spike | MS | MSD | MS | MSD | % Rec | | Max | |
| Parameter | Units | Result | Conc. | Conc. | Result | Result | % Rec | % Rec | Limits | RPD | RPD | Qual |
| Arsenic | mg/L | <0.017 | 0.28 | 0.28 | 0.28 | 0.28 | 95 | 96 | 75-125 | 2 | 20 | |
| Barium | mg/L | 0.60 | 0.28 | 0.28 | 0.88 | 0.88 | 98 | 99 | 75-125 | 0 | 20 | |
| Cadmium | mg/L | 0.0047J | 0.28 | 0.28 | 0.29 | 0.29 | 103 | 102 | 75-125 | 1 | 20 | |
| Chromium | mg/L | < 0.0051 | 0.28 | 0.28 | 0.28 | 0.28 | 99 | 99 | 75-125 | 0 | 20 | |
| Lead | mg/L | < 0.012 | 0.28 | 0.28 | 0.29 | 0.28 | 103 | 101 | 75-125 | 1 | 20 | |
| Selenium | mg/L | < 0.024 | 0.28 | 0.28 | 0.30 | 0.30 | 106 | 105 | 75-125 | 1 | 20 | |
| Silver | mg/L | < 0.0064 | 0.14 | 0.14 | 0.14 | 0.14 | 102 | 102 | 75-125 | 0 | 20 | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.





Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

| MATRIX SPIKE SAMPLE: | 2617798 | | | | | | |
|----------------------|---------|-------------|-------|--------|-------|----------|------------|
| | | 40268563001 | Spike | MS | MS | % Rec | |
| Parameter | Units | Result | Conc. | Result | % Rec | Limits | Qualifiers |
| Arsenic | mg/L | <0.042 | 0.28 | 0.30 | 95 | 75-125 | |
| Barium | mg/L | 1.4 | 0.28 | 1.7 | 90 | 75-125 | |
| Cadmium | mg/L | < 0.0067 | 0.28 | 0.28 | 101 | 75-125 | |
| Chromium | mg/L | 0.023J | 0.28 | 0.30 | 101 | 75-125 | |
| Lead | mg/L | 117 | 0.28 | 114 | -1050 | 75-125 P | 6 |
| Selenium | mg/L | < 0.061 | 0.28 | 0.30 | 108 | 75-125 | |
| Silver | mg/L | < 0.016 | 0.14 | 0.14 | 102 | 75-125 | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

(920)469-2436



QUALITY CONTROL DATA

ASTM D2974

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

QC Batch: 909800

QC Batch Method: ASTM D2974 Analysis Description: Dry Weight / %M by ASTM D2974

Laboratory: Pace Analytical Services - Minneapolis

Associated Lab Samples: 40268330001

SAMPLE DUPLICATE: 4789312

 Parameter
 Units
 10669611001 Result
 Dup Result
 Max RPD
 RPD
 Qualifiers

 Percent Moisture
 %
 19.5
 20.6
 6
 30 N2

Analysis Method:

SAMPLE DUPLICATE: 4791727

Date: 10/09/2023 11:00 AM

10670561003 Dup Max Parameter Units Result Result **RPD RPD** Qualifiers 23.0 % 2 Percent Moisture 22.4 30 N2

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

(920)469-2436



QUALITY CONTROL DATA

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

QC Batch: 455574

QC Batch Method: EPA 8260

Analysis Method: EPA 8260

Analysis Description: 8260 MSV TCLP

Laboratory: Pace Analytical Services - Green Bay

Associated Lab Samples: 40268330001

METHOD BLANK: 2616375 Matrix: Water

Associated Lab Samples: 40268330001

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|----------------------------|-------|-----------------|--------------------|----------------|------------|
| 1,1-Dichloroethene | | <0.58 | 1.0 | 09/25/23 08:25 | |
| , | ug/L | | _ | | |
| 1,2-Dichloroethane | ug/L | <0.29 | 1.0 | 09/25/23 08:25 | |
| 2-Butanone (MEK) | ug/L | <6.5 | 25.0 | 09/25/23 08:25 | |
| Benzene | ug/L | < 0.30 | 1.0 | 09/25/23 08:25 | |
| Carbon tetrachloride | ug/L | < 0.37 | 1.0 | 09/25/23 08:25 | |
| Chlorobenzene | ug/L | <0.86 | 1.0 | 09/25/23 08:25 | |
| Chloroform | ug/L | < 0.50 | 5.0 | 09/25/23 08:25 | |
| Tetrachloroethene | ug/L | <0.41 | 1.0 | 09/25/23 08:25 | |
| Trichloroethene | ug/L | < 0.32 | 1.0 | 09/25/23 08:25 | |
| Vinyl chloride | ug/L | <0.17 | 1.0 | 09/25/23 08:25 | |
| 1,2-Dichlorobenzene-d4 (S) | % | 102 | 70-130 | 09/25/23 08:25 | |
| 4-Bromofluorobenzene (S) | % | 100 | 70-130 | 09/25/23 08:25 | |
| Toluene-d8 (S) | % | 100 | 70-130 | 09/25/23 08:25 | |

METHOD BLANK: 2615200 Matrix: Solid

Associated Lab Samples: 40268330001

| | | Blank | Reporting | | |
|----------------------------|-------|--------|-----------|----------------|------------|
| Parameter | Units | Result | Limit | Analyzed | Qualifiers |
| 1,1-Dichloroethene | ug/L | <5.8 | 10.0 | 09/25/23 08:42 | |
| 1,2-Dichloroethane | ug/L | <2.9 | 10.0 | 09/25/23 08:42 | |
| 2-Butanone (MEK) | ug/L | <65.2 | 250 | 09/25/23 08:42 | |
| Benzene | ug/L | <3.0 | 10.0 | 09/25/23 08:42 | |
| Carbon tetrachloride | ug/L | <3.7 | 10.0 | 09/25/23 08:42 | |
| Chlorobenzene | ug/L | <8.6 | 10.0 | 09/25/23 08:42 | |
| Chloroform | ug/L | <5.0 | 50.0 | 09/25/23 08:42 | |
| Tetrachloroethene | ug/L | <4.1 | 10.0 | 09/25/23 08:42 | |
| Trichloroethene | ug/L | <3.2 | 10.0 | 09/25/23 08:42 | |
| Vinyl chloride | ug/L | <1.7 | 10.0 | 09/25/23 08:42 | |
| 1,2-Dichlorobenzene-d4 (S) | % | 101 | 70-130 | 09/25/23 08:42 | |
| 4-Bromofluorobenzene (S) | % | 100 | 70-130 | 09/25/23 08:42 | |
| Toluene-d8 (S) | % | 99 | 70-130 | 09/25/23 08:42 | |

LABORATORY CONTROL SAMPLE: 2616376

Date: 10/09/2023 11:00 AM

| | | Spike | LCS | LCS | % Rec | |
|--------------------|-------|-------|--------|-------|--------|------------|
| Parameter | Units | Conc. | Result | % Rec | Limits | Qualifiers |
| 1,1-Dichloroethene | ug/L | 50 | 52.6 | 105 | 73-140 | |
| 1,2-Dichloroethane | ug/L | 50 | 51.6 | 103 | 70-130 | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.



Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

| LABORATORY CONTROL SAMPLE: | 2616376 | | | | | |
|----------------------------|---------|-------|--------|-------|--------|------------|
| | | Spike | LCS | LCS | % Rec | |
| Parameter | Units | Conc. | Result | % Rec | Limits | Qualifiers |
| Benzene | ug/L | 50 | 51.5 | 103 | 70-130 | |
| Carbon tetrachloride | ug/L | 50 | 48.3 | 97 | 70-135 | |
| Chlorobenzene | ug/L | 50 | 52.0 | 104 | 70-130 | |
| Chloroform | ug/L | 50 | 49.2 | 98 | 80-124 | |
| etrachloroethene | ug/L | 50 | 48.7 | 97 | 70-130 | |
| richloroethene | ug/L | 50 | 49.6 | 99 | 70-130 | |
| inyl chloride | ug/L | 50 | 49.7 | 99 | 51-145 | |
| 2-Dichlorobenzene-d4 (S) | % | | | 99 | 70-130 | |
| Bromofluorobenzene (S) | % | | | 100 | 70-130 | |
| oluene-d8 (S) | % | | | 101 | 70-130 | |

| MATRIX SPIKE & MATRIX SP | IKE DUPLIC | CATE: 2617 | 282 | | 2617283 | | | | | | | |
|----------------------------|------------|------------|-------------|--------------|---------|--------|-------|-------|--------|-----|-----|------|
| - | | 0268341001 | MS Spike | MSD Spike | MS | MSD | MS | MSD | % Rec | | Max | |
| Parameter | Units | Result | Conc. | Conc. | Result | Result | % Rec | % Rec | Limits | RPD | RPD | Qual |
| 1,1-Dichloroethene | ug/L | <5.8 | 500 | 500 | 458 | 491 | 92 | 98 | 69-146 | 7 | 20 | |
| 1,2-Dichloroethane | ug/L | <2.9 | 500 | 500 | 445 | 480 | 89 | 96 | 70-130 | 8 | 20 | |
| Benzene | ug/L | <3.0 | 500 | 500 | 449 | 481 | 90 | 96 | 70-130 | 7 | 20 | |
| Carbon tetrachloride | ug/L | <3.7 | 500 | 500 | 419 | 455 | 84 | 91 | 70-135 | 8 | 20 | |
| Chlorobenzene | ug/L | <8.6 | 500 | 500 | 450 | 484 | 90 | 97 | 70-130 | 7 | 20 | |
| Chloroform | ug/L | <5.0 | 500 | 500 | 432 | 467 | 86 | 93 | 80-126 | 8 | 20 | |
| Tetrachloroethene | ug/L | <4.1 | 500 | 500 | 422 | 446 | 84 | 89 | 70-131 | 6 | 20 | |
| Trichloroethene | ug/L | <3.2 | 500 | 500 | 432 | 467 | 86 | 93 | 70-130 | 8 | 20 | |
| Vinyl chloride | ug/L | <1.7 | 500 | 500 | 425 | 459 | 85 | 92 | 45-147 | 8 | 20 | |
| 1,2-Dichlorobenzene-d4 (S) | % | | | | | | 99 | 100 | 70-130 | | | |
| 4-Bromofluorobenzene (S) | % | | | | | | 100 | 101 | 70-130 | | | |
| Toluene-d8 (S) | % | | | | | | 101 | 100 | 70-130 | | | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.



Project: TCLP & PFAs Testing

Pace Project No.: 40268330

QC Batch: 455790 Analysis Method: EPA 8270E

QC Batch Method: EPA 3510 Analysis Description: 8270E TCLP MSSV

Laboratory: Pace Analytical Services - Green Bay

Associated Lab Samples: 40268330001

METHOD BLANK: 2617774 Matrix: Water

Associated Lab Samples: 40268330001

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|------------------------------|-------|-----------------|--------------------|----------------|------------|
| 1,4-Dichlorobenzene | ug/L | <3.6 | 10.0 | 09/27/23 08:02 | |
| 2,4,5-Trichlorophenol | ug/L | <3.6 | 10.0 | 09/27/23 08:02 | |
| 2,4,6-Trichlorophenol | ug/L | <4.0 | 10.0 | 09/27/23 08:02 | |
| 2,4-Dinitrotoluene | ug/L | <2.4 | 10.0 | 09/27/23 08:02 | |
| 2-Methylphenol(o-Cresol) | ug/L | <1.5 | 10.0 | 09/27/23 08:02 | |
| 3&4-Methylphenol(m&p Cresol) | ug/L | <1.2 | 10.0 | 09/27/23 08:02 | |
| Hexachloro-1,3-butadiene | ug/L | <3.3 | 10.0 | 09/27/23 08:02 | |
| Hexachlorobenzene | ug/L | <5.0 | 20.0 | 09/27/23 08:02 | |
| Hexachloroethane | ug/L | <3.0 | 10.0 | 09/27/23 08:02 | |
| Nitrobenzene | ug/L | <3.1 | 10.0 | 09/27/23 08:02 | |
| Pentachlorophenol | ug/L | <3.3 | 10.0 | 09/27/23 08:02 | |
| Pyridine | ug/L | <14.6 | 20.0 | 09/27/23 08:02 | |
| 2,4,6-Tribromophenol (S) | % | 85 | 10-141 | 09/27/23 08:02 | |
| 2-Fluorobiphenyl (S) | % | 51 | 23-130 | 09/27/23 08:02 | |
| Nitrobenzene-d5 (S) | % | 70 | 38-130 | 09/27/23 08:02 | |
| Phenol-d6 (S) | % | 30 | 11-130 | 09/27/23 08:02 | |

METHOD BLANK: 2617500 Matrix: Water

Associated Lab Samples: 40268330001

Date: 10/09/2023 11:00 AM

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|------------------------------|-------|-----------------|--------------------|----------------|------------|
| 1,4-Dichlorobenzene | ug/L | <17.8 | 50.0 | 09/27/23 12:03 | |
| 2,4,5-Trichlorophenol | ug/L | <18.2 | 50.0 | 09/27/23 12:03 | |
| 2,4,6-Trichlorophenol | ug/L | <20.0 | 50.0 | 09/27/23 12:03 | |
| 2,4-Dinitrotoluene | ug/L | <11.9 | 50.0 | 09/27/23 12:03 | |
| 2-Methylphenol(o-Cresol) | ug/L | <7.7 | 50.0 | 09/27/23 12:03 | |
| 3&4-Methylphenol(m&p Cresol) | ug/L | <6.0 | 50.0 | 09/27/23 12:03 | |
| Hexachloro-1,3-butadiene | ug/L | <16.4 | 50.0 | 09/27/23 12:03 | |
| Hexachlorobenzene | ug/L | <25.2 | 100 | 09/27/23 12:03 | |
| Hexachloroethane | ug/L | <15.1 | 50.0 | 09/27/23 12:03 | |
| Nitrobenzene | ug/L | <15.7 | 50.0 | 09/27/23 12:03 | |
| Pentachlorophenol | ug/L | <16.3 | 50.0 | 09/27/23 12:03 | |
| Pyridine | ug/L | <73.0 | 100 | 09/27/23 12:03 | |
| 2,4,6-Tribromophenol (S) | % | 86 | 10-141 | 09/27/23 12:03 | |
| 2-Fluorobiphenyl (S) | % | 46 | 23-130 | 09/27/23 12:03 | |
| Nitrobenzene-d5 (S) | % | 69 | 38-130 | 09/27/23 12:03 | |
| Phenol-d6 (S) | % | 30 | 11-130 | 09/27/23 12:03 | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.



Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

| Parameter Units Spike Conc. LCS Result LCS % Rec Limits Qualifiers orobenzene ug/L 50 26.4 53 30-130 chlorophenol ug/L 50 35.7 71 47-130 chlorophenol ug/L 50 35.4 71 53-130 |
|--|
| orobenzene ug/L 50 26.4 53 30-130 chlorophenol ug/L 50 35.7 71 47-130 |
| chlorophenol ug/L 50 35.7 71 47-130 |
| |
| phorophonol ug/l 50 35.4 71 53.130 |
| chlorophenol ug/L 50 35.4 71 53-130 |
| rotoluene ug/L 50 38.1 76 61-130 |
| phenol(o-Cresol) ug/L 50 34.4 69 63-130 |
| hylphenol(m&p Cresol) ug/L 50 31.7 63 58-130 |
| pro-1,3-butadiene ug/L 50 22.1 44 10-130 |
| probenzene ug/L 50 43.8 88 61-130 |
| proethane ug/L 50 21.0 42 12-130 |
| zene ug/L 50 40.0 80 70-130 |
| orophenol ug/L 50 34.6 69 29-130 |
| ug/L 50 22.9 46 24-130 |
| oromophenol (S) % 91 10-141 |
| piphenyl (S) % 52 23-130 |
| zene-d5 (S) % 74 38-130 |
| 6 (S) % 35 11-130 |

| MATRIX SPIKE SAMPLE: | 2617776 | | | | | | |
|------------------------------|---------|-------------|-------|--------|-------|--------|------------|
| | | 40268330001 | Spike | MS | MS | % Rec | |
| Parameter | Units | Result | Conc. | Result | % Rec | Limits | Qualifiers |
| 1,4-Dichlorobenzene | ug/L | <17.8 | 250 | 146 | 58 | 30-130 | |
| 2,4,5-Trichlorophenol | ug/L | <18.2 | 250 | 92.0 | 37 | 10-136 | |
| 2,4,6-Trichlorophenol | ug/L | <20.0 | 250 | 87.5 | 35 | 10-131 | |
| 2,4-Dinitrotoluene | ug/L | <11.9 | 250 | 192 | 77 | 15-142 | |
| 2-Methylphenol(o-Cresol) | ug/L | <7.7 | 250 | 159 | 64 | 36-130 | |
| 3&4-Methylphenol(m&p Cresol) | ug/L | <6.0 | 250 | 140 | 56 | 35-130 | |
| Hexachloro-1,3-butadiene | ug/L | <16.4 | 250 | 101 | 41 | 10-130 | |
| Hexachlorobenzene | ug/L | <25.2 | 250 | 199 | 80 | 58-130 | |
| Hexachloroethane | ug/L | <15.1 | 250 | 96.8 | 39 | 12-130 | |
| Nitrobenzene | ug/L | <15.7 | 250 | 194 | 78 | 64-130 | |
| Pentachlorophenol | ug/L | <16.3 | 250 | 58.5 | 23 | 10-147 | |
| Pyridine | ug/L | <73.0 | 250 | 132 | 53 | 10-130 | |
| 2,4,6-Tribromophenol (S) | % | | | | 50 | 10-141 | |
| 2-Fluorobiphenyl (S) | % | | | | 56 | 23-130 | |
| Nitrobenzene-d5 (S) | % | | | | 73 | 38-130 | |
| Phenol-d6 (S) | % | | | | 24 | 11-130 | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

(920)469-2436



QUALITY CONTROL DATA

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

QC Batch: 907953 Analysis Method: ENV-SOP-MIN4-0178

QC Batch Method: ENV-SOP-MIN4-0178 Analysis Description: WI ID SL

Laboratory: Pace Analytical Services - Minneapolis

Associated Lab Samples: 40268330001

METHOD BLANK: 4780263 Matrix: Solid

Associated Lab Samples: 40268330001

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|------------------------------|-------|-----------------|--------------------|----------------|------------|
| 11CI-PF3OUdS | ug/kg | <0.025 | 0.093 | 09/28/23 20:55 | |
| 4:2 FTS | ug/kg | <0.023 | 0.093 | 09/28/23 20:55 | |
| 6:2 FTS | ug/kg | < 0.041 | 0.094 | 09/28/23 20:55 | |
| 8:2 FTS | ug/kg | < 0.043 | 0.096 | 09/28/23 20:55 | |
| 9CI-PF3ONS | ug/kg | < 0.025 | 0.092 | 09/28/23 20:55 | |
| ADONA | ug/kg | < 0.036 | 0.094 | 09/28/23 20:55 | |
| HFPO-DA | ug/kg | < 0.027 | 0.099 | 09/28/23 20:55 | |
| NEtFOSA | ug/kg | < 0.025 | 0.099 | 09/28/23 20:55 | |
| NEtFOSAA | ug/kg | < 0.040 | 0.099 | 09/28/23 20:55 | |
| NEtFOSE | ug/kg | < 0.032 | 0.099 | 09/28/23 20:55 | |
| NMeFOSA | ug/kg | < 0.027 | 0.099 | 09/28/23 20:55 | |
| NMeFOSAA | ug/kg | <0.028 | 0.099 | 09/28/23 20:55 | |
| NMeFOSE | ug/kg | < 0.030 | 0.099 | 09/28/23 20:55 | |
| Perfluorobutanesulfonic acid | ug/kg | < 0.026 | 0.088 | 09/28/23 20:55 | |
| Perfluorodecanoic acid | ug/kg | < 0.023 | 0.099 | 09/28/23 20:55 | |
| Perfluorododecanoic acid | ug/kg | < 0.033 | 0.099 | 09/28/23 20:55 | |
| Perfluoroheptanoic acid | ug/kg | < 0.034 | 0.099 | 09/28/23 20:55 | |
| Perfluorohexanesulfonic acid | ug/kg | 0.023J | 0.090 | 09/28/23 20:55 | |
| Perfluorohexanoic acid | ug/kg | < 0.027 | 0.099 | 09/28/23 20:55 | |
| Perfluorononanoic acid | ug/kg | <0.031 | 0.099 | 09/28/23 20:55 | |
| Perfluorooctanesulfonic acid | ug/kg | 0.056J | 0.092 | 09/28/23 20:55 | |
| Perfluorooctanoic acid | ug/kg | <0.031 | 0.099 | 09/28/23 20:55 | |
| Perfluorotetradecanoic acid | ug/kg | < 0.034 | 0.099 | 09/28/23 20:55 | |
| Perfluorotridecanoic acid | ug/kg | < 0.032 | 0.099 | 09/28/23 20:55 | |
| Perfluoroundecanoic acid | ug/kg | < 0.030 | 0.099 | 09/28/23 20:55 | |
| PFBA | ug/kg | <0.028 | 0.099 | 09/28/23 20:55 | |
| PFDoS | ug/kg | <0.026 | 0.096 | 09/28/23 20:55 | |
| PFDS | ug/kg | <0.028 | 0.096 | 09/28/23 20:55 | |
| PFHpS | ug/kg | <0.027 | 0.094 | 09/28/23 20:55 | |
| PFNS | ug/kg | < 0.034 | 0.095 | 09/28/23 20:55 | |
| PFOSA | ug/kg | <0.029 | 0.099 | 09/28/23 20:55 | |
| PFPeA | ug/kg | <0.028 | 0.099 | 09/28/23 20:55 | |
| PFPeS | ug/kg | <0.024 | 0.093 | 09/28/23 20:55 | |
| 13C2-PFDoA (S) | %. | 90 | 25-150 | 09/28/23 20:55 | |
| 13C2-PFTA (S) | %. | 81 | 25-150 | 09/28/23 20:55 | |
| 13C24:2FTS (S) | %. | 101 | 25-150 | 09/28/23 20:55 | |
| 13C26:2FTS (S) | %. | 123 | 25-150 | 09/28/23 20:55 | |
| 13C28:2FTS (S) | %. | 105 | 25-150 | 09/28/23 20:55 | |
| 13C2PFHxDA (S) | %. | 86 | 25-150 | 09/28/23 20:55 | |
| 13C3-PFBS (S) | %. | 82 | 25-150 | 09/28/23 20:55 | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.



Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

METHOD BLANK: 4780263 Matrix: Solid

Associated Lab Samples: 40268330001

| | | Blank | Reporting | | |
|-----------------|------------|--------|-----------|----------------|------------|
| Parameter | Units | Result | Limit | Analyzed | Qualifiers |
| 13C3-PFHxS (S) | <u></u> %. | 84 | 25-150 | 09/28/23 20:55 | |
| 13C3HFPO-DA (S) | %. | 66 | 25-150 | 09/28/23 20:55 | |
| 13C4-PFBA (S) | %. | 88 | 25-150 | 09/28/23 20:55 | |
| 13C4-PFHpA (S) | %. | 85 | 25-150 | 09/28/23 20:55 | |
| 13C5-PFHxA (S) | %. | 82 | 25-150 | 09/28/23 20:55 | |
| 13C5-PFPeA (S) | %. | 81 | 25-150 | 09/28/23 20:55 | |
| 13C6-PFDA (S) | %. | 88 | 25-150 | 09/28/23 20:55 | |
| 13C7-PFUdA (S) | %. | 89 | 25-150 | 09/28/23 20:55 | |
| 13C8-PFOA (S) | %. | 85 | 25-150 | 09/28/23 20:55 | |
| 13C8-PFOS (S) | %. | 93 | 25-150 | 09/28/23 20:55 | |
| 13C8-PFOSA (S) | %. | 79 | 25-150 | 09/28/23 20:55 | |
| 13C9-PFNA (S) | %. | 81 | 25-150 | 09/28/23 20:55 | |
| d3-MeFOSAA (S) | %. | 90 | 25-150 | 09/28/23 20:55 | |
| d3-NMeFOSA (S) | %. | 77 | 20-150 | 09/28/23 20:55 | |
| d5-EtFOSAA (S) | %. | 91 | 25-150 | 09/28/23 20:55 | |
| d5-NEtFOSA (S) | %. | 81 | 20-150 | 09/28/23 20:55 | |
| d7-NMeFOSE (S) | %. | 77 | 20-150 | 09/28/23 20:55 | |
| d9-NEtFOSE (S) | %. | 80 | 20-150 | 09/28/23 20:55 | |

| LABORATORY CONTROL SAMPLE | & LCSD: 4780264 | | 47 | 80265 | | | | | | |
|------------------------------|-----------------|-------|--------|--------|-------|-------|--------|-----|-----|------------|
| | | Spike | LCS | LCSD | LCS | LCSD | % Rec | | Max | |
| Parameter | Units | Conc. | Result | Result | % Rec | % Rec | Limits | RPD | RPD | Qualifiers |
| 11CI-PF3OUdS | ug/kg | 0.19 | 0.15 | 0.15 | 83 | 81 | 50-150 | 2 | 30 | |
| 4:2 FTS | ug/kg | 0.18 | 0.16 | 0.16 | 89 | 87 | 50-150 | 2 | 30 | |
| 6:2 FTS | ug/kg | 0.19 | 0.17 | 0.16 | 92 | 85 | 50-150 | 7 | 30 | |
| 8:2 FTS | ug/kg | 0.19 | 0.19 | 0.17 | 100 | 90 | 50-150 | 11 | 30 | |
| 9CI-PF3ONS | ug/kg | 0.18 | 0.15 | 0.15 | 82 | 79 | 50-150 | 3 | 30 | |
| ADONA | ug/kg | 0.19 | 0.16 | 0.16 | 86 | 84 | 50-150 | 2 | 30 | |
| HFPO-DA | ug/kg | 0.2 | 0.18 | 0.16 | 91 | 83 | 50-150 | 9 | 30 | |
| NEtFOSA | ug/kg | 0.2 | 0.17 | 0.16 | 84 | 81 | 50-150 | 4 | 30 | |
| NEtFOSAA | ug/kg | 0.2 | 0.18 | 0.17 | 93 | 86 | 50-150 | 8 | 30 | |
| NEtFOSE | ug/kg | 0.2 | 0.17 | 0.16 | 84 | 79 | 50-150 | 5 | 30 | |
| NMeFOSA | ug/kg | 0.2 | 0.15 | 0.18 | 78 | 89 | 50-150 | 13 | 30 | |
| NMeFOSAA | ug/kg | 0.2 | 0.17 | 0.18 | 87 | 91 | 50-150 | 5 | 30 | |
| NMeFOSE | ug/kg | 0.2 | 0.17 | 0.16 | 86 | 80 | 50-150 | 7 | 30 | |
| Perfluorobutanesulfonic acid | ug/kg | 0.17 | 0.16 | 0.16 | 92 | 90 | 50-150 | 2 | 30 | |
| Perfluorodecanoic acid | ug/kg | 0.2 | 0.18 | 0.17 | 92 | 84 | 50-150 | 8 | 30 | |
| Perfluorododecanoic acid | ug/kg | 0.2 | 0.21 | 0.18 | 104 | 91 | 50-150 | 12 | 30 | |
| Perfluoroheptanoic acid | ug/kg | 0.2 | 0.17 | 0.17 | 88 | 85 | 50-150 | 4 | 30 | |
| Perfluorohexanesulfonic acid | ug/kg | 0.18 | 0.20 | 0.20 | 108 | 109 | 50-150 | 1 | 30 | |
| Perfluorohexanoic acid | ug/kg | 0.2 | 0.18 | 0.17 | 92 | 86 | 50-150 | 7 | 30 | |
| Perfluorononanoic acid | ug/kg | 0.2 | 0.19 | 0.17 | 95 | 87 | 50-150 | 8 | 30 | |
| Perfluorooctanesulfonic acid | ug/kg | 0.18 | 0.22 | 0.22 | 122 | 120 | 50-150 | 1 | 30 | |
| Perfluorooctanoic acid | ug/kg | 0.2 | 0.19 | 0.18 | 96 | 90 | 50-150 | 6 | 30 | |
| | | | | | | | | | | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.



Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

| LABORATORY CONTROL SAMPLE | E & LCSD: 4780264 | | 47 | 80265 | | | | | | |
|-----------------------------|-------------------|-------|--------|--------|-------|-------|--------|-----|-----|------------|
| | | Spike | LCS | LCSD | LCS | LCSD | % Rec | | Max | |
| Parameter | Units | Conc. | Result | Result | % Rec | % Rec | Limits | RPD | RPD | Qualifiers |
| Perfluorotetradecanoic acid | ug/kg | 0.2 | 0.18 | 0.17 | 90 | 86 | 50-150 | 3 | 30 | |
| Perfluorotridecanoic acid | ug/kg | 0.2 | 0.19 | 0.17 | 94 | 87 | 50-150 | 7 | 30 | |
| Perfluoroundecanoic acid | ug/kg | 0.2 | 0.18 | 0.18 | 93 | 92 | 50-150 | 0 | 30 | |
| PFBA | ug/kg | 0.2 | 0.22 | 0.21 | 112 | 104 | 50-150 | 7 | 30 | |
| PFDoS | ug/kg | 0.19 | 0.17 | 0.16 | 89 | 83 | 50-150 | 6 | 30 | |
| PFDS | ug/kg | 0.19 | 0.16 | 0.17 | 82 | 90 | 50-150 | 10 | 30 | |
| PFHpS | ug/kg | 0.19 | 0.17 | 0.15 | 93 | 82 | 50-150 | 12 | 30 | |
| PFNS | ug/kg | 0.19 | 0.16 | 0.16 | 85 | 82 | 50-150 | 3 | 30 | |
| PFOSA | ug/kg | 0.2 | 0.19 | 0.19 | 98 | 94 | 50-150 | 4 | 30 | |
| PFPeA | ug/kg | 0.2 | 0.18 | 0.18 | 93 | 89 | 50-150 | 5 | 30 | |
| PFPeS | ug/kg | 0.19 | 0.18 | 0.16 | 98 | 86 | 50-150 | 12 | 30 | |
| 13C2-PFDoA (S) | %. | | | | 84 | 87 | 25-150 | | | |
| 13C2-PFTA (S) | %. | | | | 77 | 83 | 25-150 | | | |
| 13C24:2FTS (S) | %. | | | | 93 | 92 | 25-150 | | | |
| 13C26:2FTS (S) | %. | | | | 112 | 111 | 25-150 | | | |
| 13C28:2FTS (S) | %. | | | | 100 | 102 | 25-150 | | | |
| 13C2PFHxDA (S) | %. | | | | 84 | 81 | 25-150 | | | |
| 13C3-PFBS (S) | %. | | | | 79 | 81 | 25-150 | | | |
| 13C3-PFHxS (S) | %. | | | | 77 | 82 | 25-150 | | | |
| 13C3HFPO-DA (S) | %. | | | | 64 | 67 | 25-150 | | | |
| 13C4-PFBA (S) | %. | | | | 84 | 87 | 25-150 | | | |
| 13C4-PFHpA (S) | %. | | | | 81 | 82 | 25-150 | | | |
| 13C5-PFHxA (S) | %. | | | | 78 | 81 | 25-150 | | | |
| 13C5-PFPeA (S) | %. | | | | 78 | 80 | 25-150 | | | |
| 13C6-PFDA (S) | %. | | | | 85 | 89 | 25-150 | | | |
| 13C7-PFUdA (S) | %. | | | | 82 | 79 | 25-150 | | | |
| 13C8-PFOA (S) | %. | | | | 80 | 81 | 25-150 | | | |
| 13C8-PFOS (S) | %. | | | | 80 | 86 | 25-150 | | | |
| 13C8-PFOSA (S) | %. | | | | 79 | 80 | 25-150 | | | |
| 13C9-PFNA (S) | %. | | | | 82 | 81 | 25-150 | | | |
| d3-MeFOSAA (S) | %. | | | | 86 | 79 | 25-150 | | | |
| d3-NMeFOSA (S) | %. | | | | 79 | 76 | 20-150 | | | |
| d5-EtFOSAA (S) | %. | | | | 80 | 86 | 25-150 | | | |
| d5-NEtFOSA (S) | %. | | | | 80 | 76 | 20-150 | | | |
| d7-NMeFOSE (S) | %. | | | | 74 | 74 | 20-150 | | | |
| d9-NEtFOSE (S) | %. | | | | 78 | 79 | 20-150 | | | |
| | | | | | | | | | | |

| SAMPLE DUPLICATE: 4781045 | | 40268330001 | Dup | | Max | |
|---------------------------|-------|-------------|---------|-----|-----|------------|
| Parameter | Units | Result | Result | RPD | RPD | Qualifiers |
| 11CI-PF3OUdS | ug/kg | <0.030 | <0.030 | | 30 | |
| 4:2 FTS | ug/kg | <0.028 | <0.028 | | 30 | |
| 6:2 FTS | ug/kg | 1.3 | 1.3 | 2 | 30 | |
| 8:2 FTS | ug/kg | 0.14 | 0.14 | 5 | 30 | |
| 9CI-PF3ONS | ug/kg | < 0.030 | < 0.030 | | 30 | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.



Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

| SAMPLE DUPLICATE: 4781045 | | 40000000000 | _ | | |
|------------------------------|----------|-----------------------|---------------|-----|-----------------------|
| Parameter | Units | 40268330001 Result | Dup Result | RPD | Max RPD Qualifier: |
| ADONA | ug/kg | <0.043 | <0.043 | | 30 |
| HFPO-DA | ug/kg | < 0.033 | < 0.033 | | 30 |
| NEtFOSA | ug/kg | < 0.031 | < 0.031 | | 30 |
| NEtFOSAA | ug/kg | <0.048 | <0.048 | | 30 |
| NEtFOSE | ug/kg | < 0.039 | < 0.039 | | 30 |
| NMeFOSA | ug/kg | < 0.033 | < 0.033 | | 30 |
| NMeFOSAA | ug/kg | < 0.034 | < 0.034 | | 30 |
| NMeFOSE | ug/kg | < 0.036 | < 0.036 | | 30 |
| Perfluorobutanesulfonic acid | ug/kg | < 0.031 | < 0.032 | | 30 |
| Perfluorodecanoic acid | ug/kg | 1.0 | 0.99 | 3 | 30 |
| Perfluorododecanoic acid | ug/kg | 0.16 | 0.16 | 3 | 30 |
| Perfluoroheptanoic acid | ug/kg | 2.9 | 2.9 | 2 | 30 |
| Perfluorohexanesulfonic acid | ug/kg | 0.046J | 0.047J | _ | 30 |
| Perfluorohexanoic acid | ug/kg | 2.7 | 2.5 | 8 | 30 |
| Perfluorononanoic acid | ug/kg | 4.0 | 3.6 | 10 | 30 |
| Perfluorooctanesulfonic acid | ug/kg | 0.62 | 0.60 | 3 | 30 |
| Perfluorooctanesunonic acid | | 1.8 | 1.7 | 1 | 30 |
| | ug/kg | <0.041 | | Į. | |
| Perfluorotetradecanoic acid | ug/kg | | <0.041 | | 30 |
| Perfluorotridecanoic acid | ug/kg | 0.065J | 0.065J | 4 | 30 |
| Perfluoroundecanoic acid | ug/kg | 0.95 | 0.92 | 4 | 30 |
| PFBA | ug/kg | 1.4 | 1.3 | 8 | 30 |
| PFDoS | ug/kg | <0.031 | <0.031 | | 30 |
| PFDS | ug/kg | <0.034 | < 0.034 | | 30 |
| PFHpS | ug/kg | < 0.033 | < 0.033 | | 30 |
| PFNS | ug/kg | <0.042 | < 0.042 | | 30 |
| PFOSA | ug/kg | < 0.035 | < 0.035 | | 30 |
| PFPeA | ug/kg | 4.6 | 4.3 | 7 | 30 |
| PFPeS | ug/kg | < 0.029 | < 0.029 | | 30 |
| 3C2-PFDoA (S) | %. | 75 | 80 | | |
| 3C2-PFTA (S) | %. | 69 | 75 | | |
| 3C24:2FTS (S) | %. | 76 | 76 | | |
| 3C26:2FTS (S) | %. | 131 | 136 | | |
| 3C28:2FTS (S) | %. | 176 | 168 | | S0 |
| 3C2PFHxDA (S) | %. | 63 | 69 | | |
| 3C3-PFBS (S) | %. | 74 | 75 | | |
| 3C3-PFHxS (S) | %. | 75 | 77 | | |
| 3C3HFPO-DA (S) | %. | 43 | 45 | | |
| 3C4-PFBA (S) | %. | 82 | 83 | | |
| 3C4-PFHpA (S) | %. | 73 | 75 | | |
| 3C5-PFHxA (S) | %. | 74 | 75 | | |
| 3C5-PFPeA (S) | %. | 75 | 76 | | |
| 3C6-PFDA (S) | %. %. | 75 77 | 76 78 | | |
| 3C7-PFUdA (S) | %. %. | 73 | 76 75 | | |
| | | 73 71 | | | |
| 3C8-PFOA (S) | %. | | 72 | | |
| 13C8-PFOS (S) | %. | 84 | 83 | | |
| I3C8-PFOSA (S) | %. | 67 | 61 | | |
| 13C9-PFNA (S) | %. | 69 | 76 | | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.





Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

| | | 40268330001 | Dup | | Max | |
|----------------|--------|-------------|--------|-----|-----|------------|
| Parameter | Units | Result | Result | RPD | RPD | Qualifiers |
| d3-MeFOSAA (S) | — ——— | | 88 | | | |
| d3-NMeFOSA (S) | %. | 25 | 32 | | | |
| d5-EtFOSAA (S) | %. | 88 | 91 | | | |
| 5-NEtFOSA (S) | %. | 26 | 33 | | | |
| 17-NMeFOSE (S) | %. | 50 | 49 | | | |
| d9-NEtFOSE (S) | %. | 53 | 48 | | | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.



QUALIFIERS

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above LOD.

J - Estimated concentration at or above the LOD and below the LOQ.

LOD - Limit of Detection adjusted for dilution factor, percent moisture, initial weight and final volume.

LOQ - Limit of Quantitation adjusted for dilution factor, percent moisture, initial weight and final volume.

DL - Adjusted Method Detection Limit.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected at or above the adjusted LOD.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

ANALYTE QUALIFIERS

Date: 10/09/2023 11:00 AM

| B Analyte was detected in the associated metho | d blank. |
|--|----------|
|--|----------|

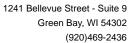
- D3 Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.
- N2 The lab does not hold NELAC/TNI accreditation for this parameter but other accreditations/certifications may apply. A

complete list of accreditations/certifications is available upon request.

P6 Matrix spike recovery was outside laboratory control limits due to a parent sample concentration notably higher than the

spike level.

S0 Surrogate recovery outside laboratory control limits.





QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: TCLP & PFAs Testing

Pace Project No.: 40268330

Date: 10/09/2023 11:00 AM

| Lab ID | Sample ID | QC Batch Method | QC Batch | Analytical Method | Analytical Batch |
|-------------|-------------------|-------------------|----------|-------------------|---------------------|
| 40268330001 | 91520 TCLP & PFAs | EPA 3015A | 455795 | EPA 6010D | 455851 |
| 40268330001 | 91520 TCLP & PFAs | EPA 7470 | 455937 | EPA 7470 | 455989 |
| 40268330001 | 91520 TCLP & PFAs | ASTM D2974 | 909800 | | |
| 40268330001 | 91520 TCLP & PFAs | EPA 3510 | 455790 | EPA 8270E | 455819 |
| 40268330001 | 91520 TCLP & PFAs | EPA 8260 | 455574 | | |
| 40268330001 | 91520 TCLP & PFAs | ENV-SOP-MIN4-0178 | 907953 | ENV-SOP-MIN4-0178 | 909006 |

| | CHAIN | OF 611 | CTODY | A l4. | ! | | *** | | Τ | | BIICE | ONLY- A | ffiv \A/c | rkordo | r/Login | Labol | Horo or Lie | t Daca Warke | ardor Numbe | | |
|--|----------------------------|----------------|---|--|------------|---------------------------------------|---|--------------|--------------------------|---------|--------------------|--------------|-------------|------------------|--|--|-----------------------|--|-------------|---------------------|------------------|
| CHAIN-OF-CUSTODY Analytical Request Document Pace Analytical* | | | | | | | LAB USE ONLY- Affix Workorder/Login Label Here or List Pace Workorder Number or MTJL Log-in Number Here | | | | | | | | | | | | | | |
| Chain-of-Custody is a LEGAL DOCUMENT - Complete all relevent fields | | | | | | 40268330 | | | | | | | | | | | | | | | |
| Company: Chembasich Products Inc | | | | | | | ALL SHADED AREAS are for LAB USE ONLY | | | | | | | | | | | | | | |
| Address: 2 Stanton S | treet | | | | | | | | | C | ontaine T | r Preser | vative 1 | ype ** | | 1 | Lab Proje | ct Manager: | , | | |
| Report To: Thomas Willis Email To: twillis | | | | nah | anda | .>n / | 2111 | | | | | | | | | | sodium hydroxi | | | | |
| Copy To: Site Collection In | | | tion Info/A | ddress: | E. WE | 1, Trice | ,,,,, | | thanol, (7) imonium h | | | | | | | ne, (A) ascor | bıc acıd, (B) am – | monium sulfa | te, | | |
| Customer Project Name/Number: State: | | | State: | Cρųnty/Ci | ty: 11 Tu | me Zone Co | ollected: | | | | | Analys | ses | | | 7 | Lab Profil | e/Line: umple Recei | nt Checkl | ist, | |
| | | | State: | Marin | ettei |] PT [] M | TIMET | [] ET | * 1 200 | 0 | $\sqrt{}$ | | | | | | | ly Seals Pr | - | | JA |
| Phone: (7/5) 135 8263 | Site/Facility ID | #: | Compliance Monitoring? [] Yes [] No | | | | | | | | | | | Custo | ly Signatur tor Signat | es Present | t YNN | IA IA | | | |
| Collected By (print): | Purchase Order Quote #: | r#: | | DW PWS ID #: DW Location Code: | | | | 3 | | | | | | | Correct Suffic | t Bottles cient Volum | | | IA A | | |
| Collected By (signature): | Turnaround Da | te Requir | ed: | | Immediat | ely Packed [] No | | | | YA | | | | | ' | | VOA - USDA 1 | es Received Headspace Regulated S | Accept bl | YWY | iA iA |
| Sample Disposal: [] Dispose as appropriate [] Return [] Archive: | [] 2 Day [| | Field Filtered (if applicable): [] Next Day [] Yes [] No [] 4 Day [] 5 Day | | | | Q\ - | SVC | 13 | ٤, ٣. | | | | | Reside Cl Stample | es in Holdinal Chlorin cips pH Accept cips: | a Present | Y N N | IA . | | |
| * Matrix Codes (Insert in Matrix bo Product (P), Soil/Solid (SL), Oil (OI | x below): Drinki | ng Water | (DW), Grou | | | | | | 2 | 76 | ST | ş hı | × | | , , | | Leau 1 | le Present acetate Str | ips: | YNN | A 5 /5 /5 |
| Customer Sample ID | Matrix * | Comp / Grab | Compos | Collected (or Composite End Res # of Cl Ctns | | | | # of Ctns | 12 | 50 | PFI | ξ μ. , | | F / | , . | | Lab | | comments: | & * * * * * | ' * ' ' , ' to |
| 9/520 -VC | Bulk | \overline{C} | 9/5/3 | Time 12 pm | Date | Time | | | X | + | + | | - Nº | - | | | | (| 201 | , v | \$64v / 1 |
| 91520-5100 | Bulk | 2 | 9/15/23 | 1204 | | | | | rug) | X | | sought of m | , a | ař. | 7 | | 4. | , 4,00 | , " | . Desta | |
| 91520-RCRAMT | Bulk | C | 9/15/23 | 12 pm | | | | | | X | · | N , 1 | | | | | | 4 6 | , | | |
| 91520-PFAS 33 | Bulk | _ | 916/23 | 12 pm | | | | | | ~ | X | u, M | | | | | and the | in . | , | , , , ₂₄ | |
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| Customer Remarks / Special Condition | ions / Possible H | azards: | Type of Ice | e Used: | Wet E | Blue Di | ry No | ne | <u> </u> | SHORT H | OLDS P | RESENT | (<72 h | urs): | Y N | N/A | <u> </u> | Lab Sample | Temperature | e Info: | $\overline{}$ |
| | | | | | | | Lab Tracking #: 2909312 Temp Blank Received: Y NA NA Therm ID#: | | | | | | | | | | | | | | |
| Radchem sample(s) screened (<500 cpm): Y N NA | | | | | | | Samples received via: Cooler 1 Temp of Necespt: OC | | | | | | oC | | | | | | | | |
| Relinquished by/Company: (Signature) Date/Time: Received by/Company: (Signature) | | | | | | ure) | Date/Time: MTJL LAB USE ONLY Comments: | | | | | | oC | | | | | | | | |
| Relinquished by/Company: (Signature) Paye/fine: Received by/Company: (Signature) | | | | | | | | | | - 1 | Table # Acctnui | | | | all the same | 1 de . | | the state of the s | | | |
| Relinquished by/Company: (Signatu | re) | 9/2 | :/fime: 20/23 (|)945 | Keceived b | y/Company | y: (Signati | | i ac | | /Time: | 094 | , _ | empla relogii | te: | | | | Received: | | NA er~~ ~~ |
| Relinquished by/Company: (Signature) Date/Time: Received by/Company: (Signature) | | | | | | Date/Time: PM: Non Conformance(s): Pd | | | | | Page 2 of: | 5 of 28 | | | | | | | | | |



nemDesign Packing Slip

| Date: | 09/18/23 |
|-------|----------|

CHEMDESIGN PRODUCTS INC

| WE MAKE C | CHEMISTRY WORK | | | | | |
|---------------------|---|--|--|--|--|------------|
| | | • • • | REQUISITION: | Willis | Pace Environmenta | a 09/18/23 |
| Ship to: | Pace Environmental | | Fror | n: Tom Will | is SIGN PRODUCTS IN | 10 |
| | Pace Environmental L 1241 Bellevue St, Suit | | | NC . | | |
| • | Green Bay, WI 54302 | | | e, WI 54143 -8263 | | |
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| | | FEDEX Priority Overr | | | id by CDPI | - |
| | 24 HOUR EMERGENCY RESPO |)NSE NUMBER 1-800-688-4 | 1005 FOR VEOLIA ENV | TRONMENTAL S | ERVICES CONTRACT #20 | 1205-024 |
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| • | | | | | - | |
| | | | | • | | |
| Receive | ed By: | | | Date: | | - |

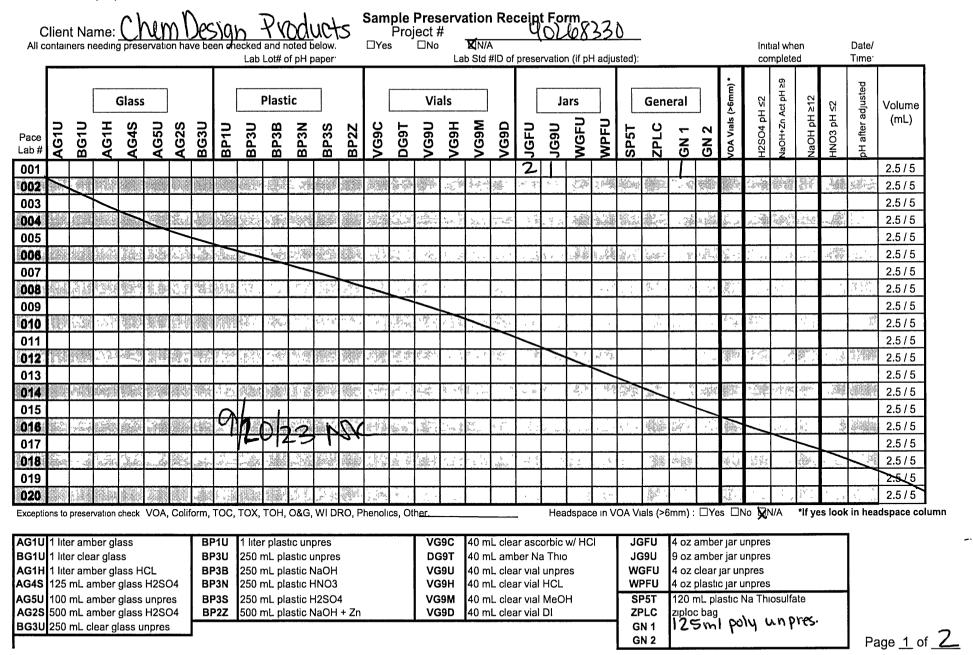
Please contact Customer Service at 715-735-8270 with any questions or concerns.

Thank you for your business!

2 Stanton Street, Marinette WI 715-735-9033 fax 715-735-5304

DC# Title: ENV-FRM-GBAY-0035 v03 Sample Preservation Receipt Form

Effective Date: 8/16/2022



DC#_Title: ENV-FRM-GBAY-0014 v03_SCUR

Effective Date: 8/17/2022

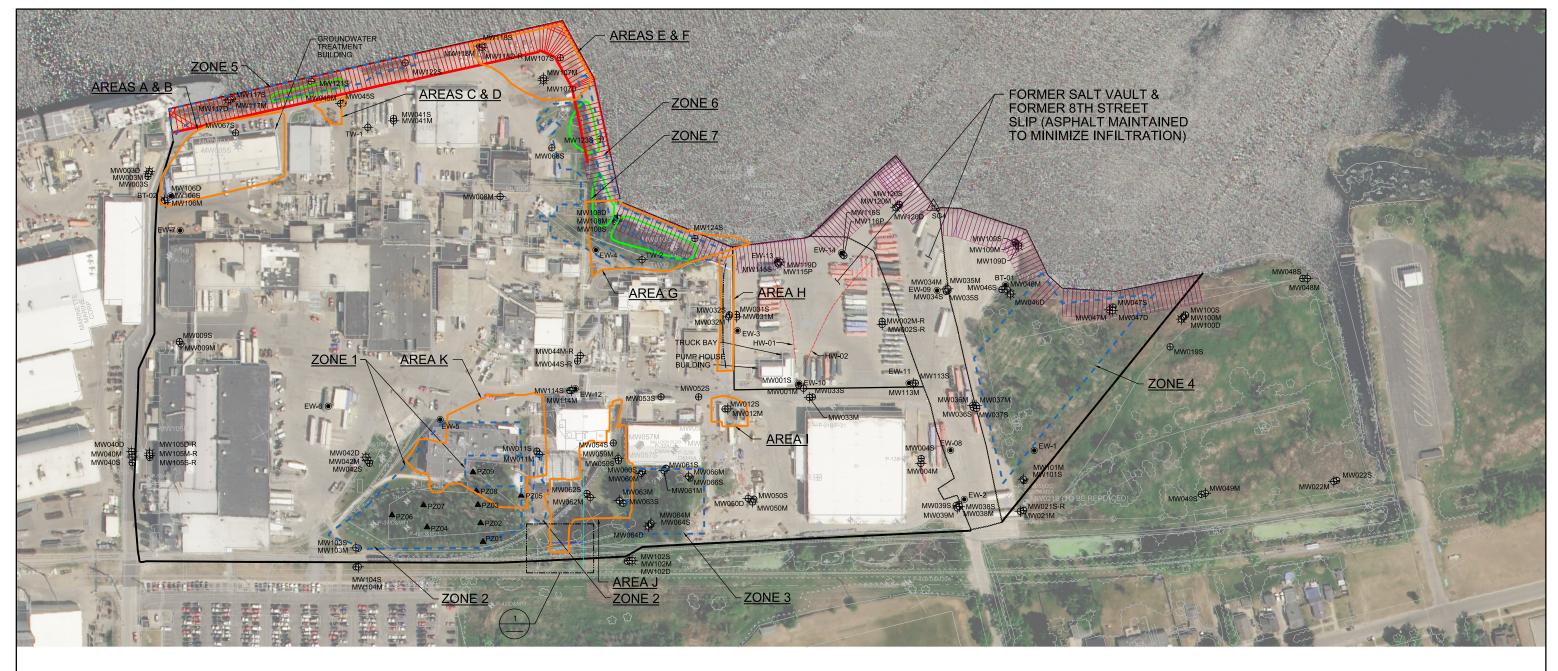
Sample Condition Upon Receipt Form (SCUR)

| | | | • | Project #: |
|---|--------------|-----------------|--------------|---|
| Client Name: Chem Design Pro | du | cts | <u> </u> | LIO#: 40268330 |
| Courier: CS Logistics Fed Ex Speede | e 💢 | UPS | | /altco |
| Client Pace Other: | | | | |
| Tracking #: 125929100391529 | 54 | $\overline{7C}$ |) | 40268330 |
| Custody Seal on Cooler/Box Present: yes | (no | Seals | intact: | yes _ no |
| Custody Seal on Samples Present: | no | Seals | intact: | ☐ yes ☐ no |
| Packing Material: Subble Wrap Bubbl | e Bag | s [| None | Other |
| Thermometer Used SR - 131 | Туре | of Ice: | Wet | Blue Dry None |
| Cooler Temperature Uncorr: 17.5 /Corr: 1 | 7. <i>0</i> | | _ | Person examining contents: |
| Temp Blank Present: | | Biolo | gical T | Tissue is Frozen: ☐ yes☐ no Date: 120/23/Initials: 1 |
| Temp should be above freezing to 6°C. Biota Samples may be received at ≤ 0°C if shipped on Dry | lce. | | | Labeled By Initials: |
| Chain of Custody Present: | ¥Yes | □No | □n/a | 1. |
| Chain of Custody Filled Out: | □Yes | ⊠No | □n/a | 2. pg.#, Proj. name/#, Dresery 9/20/23 NA |
| Chain of Custody Relinquished: | Yes | □No | □n/a | 3. |
| Sampler Name & Signature on COC: | ⊠Yes | □No | □n/a | 4. |
| Samples Arrived within Hold Time: | ⊠ Yes | □No | | 5. |
| - DI VOA Samples frozen upon receipt | □Yes | □No | | Date/Time: |
| Short Hold Time Analysis (<72hr): | □Yes | ĭ€No | | 6. |
| Rush Turn Around Time Requested: | □Yes | ⊠No | | 7. |
| Sufficient Volume: | | | | 8. |
| For Analysis: XiYes □No MS/MSD: | □Yes | ■No | □n/a | |
| Correct Containers Used: | ⊠ Yes | □No | | 9. |
| Correct Type: Pace Green Bay, Pace IR, Non-Pace | | | | |
| Containers Intact: | Yes | □No | | 10. |
| Filtered volume received for Dissolved tests | □Yes | □No | ⊠ N/A | 11. |
| Sample Labels match COC: | □Yes | No | □n/a | 12. no date/time |
| -Includes date/time/ID/Analysis Matrix: | <u> S</u> | <u> </u> | | 1Dis 91523 instead of 91520 9/20/23 NK |
| Trip Blank Present. | □Yes | □No | ⊠ N/A | 13. |
| Trip Blank Custody Seals Present | □Yes | □No | ⊠ N/A | |
| Pace Trip Blank Lot # (if purchased): | | | | |
| Client Notification/ Resolution: | | | D-1 ~ | If checked, see attached form for additional comments |
| Person Contacted: Comments/ Resolution: Tottled PM | al. | 721 | Date/i | temp 9/20/23 NK |
| Per Cleant (TDM Willis)-N | (m | | | Wertenp Alany, 9/20/23 |
| | | | ~ | (Carrier) |
| | | | | |

PM Review is documented electronically in LIMs. By releasing the project, the PM acknowledges they have reviewed the sample login

Page 2 of 2

Attachment 3







LEGEND EW-5 OR BT-02● EXTRACTION WELL OR TEST WELL MW002S OR MW115P MONITORING WELL - SHALLOW OR PEAT MW002M - MONITORING WELL - MEDIUM MW002D MONITORING WELL - DEEP (BEDROCK) PZ04 ▲ PIEZOMETER VW-TB01 ▲ VIBRATING WIRE PIEZOMETER SG1/m STAFF GAUGE WELLS PREVIOUSLY ABANDONED OR DESTROYED GRAB GROUNDWATER SAMPLE LOCATION SHEET PILE WALL ----- HORIZONTAL WELL (SCREEN) HORIZONTAL WELL (RISER) PHYTO-PUMPING AREAS

COVER AREA LOCATIONS

SOIL BERM

2010 H-PILE WALL AND TIE-RODS

2013 H-PILE WALL AND TIE-RODS

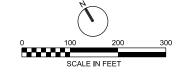


FIGURE 1 SITE PLAN WITH RCRA COMPONENTS AND CHEMDESIGN'S PROPOSED WATER LINE

TYCO FIRE PRODUCTS LP MARINETTE, WISCONSIN

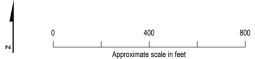


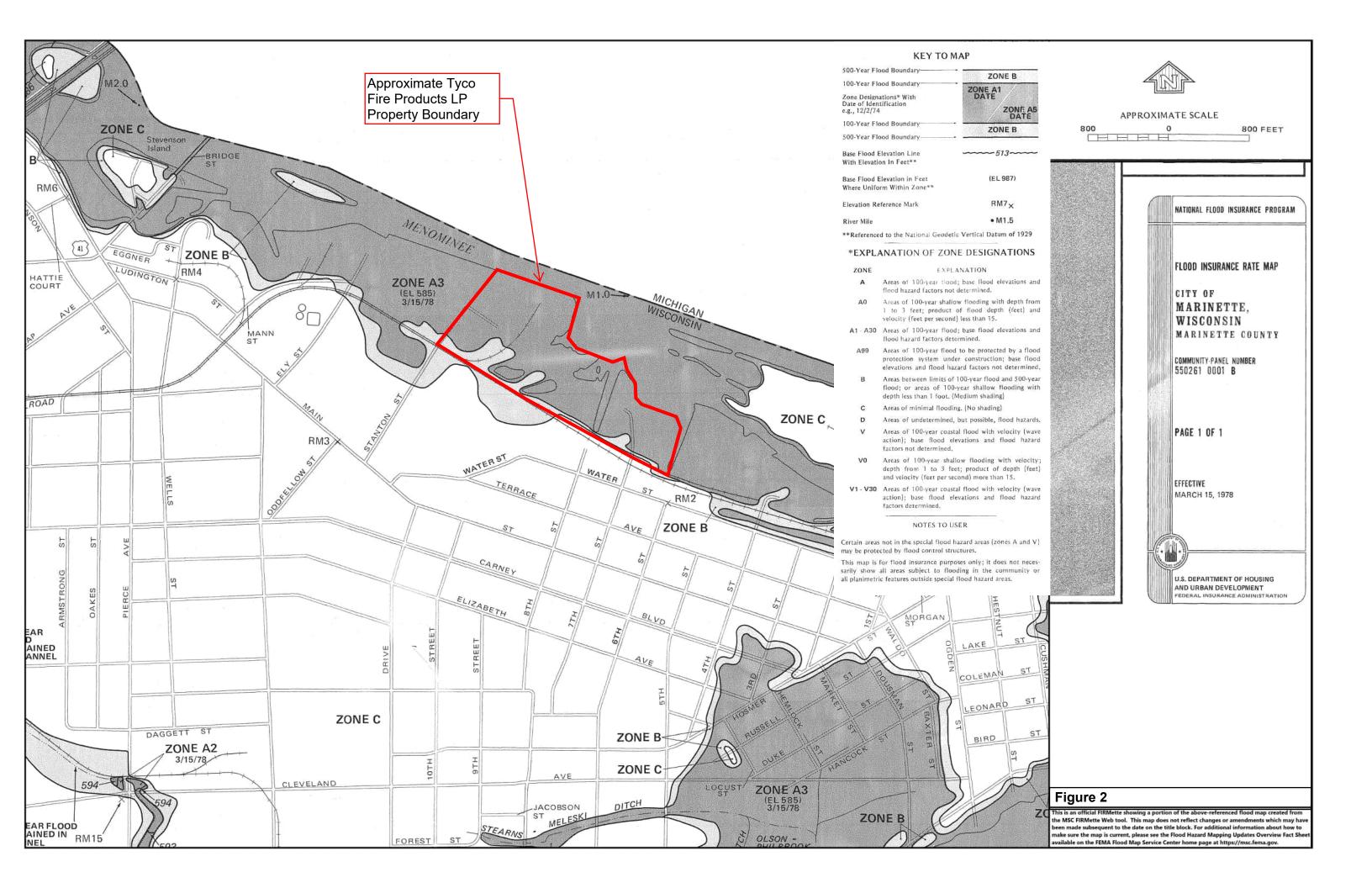
FILENAME: Figure1RCRA_D3766600.dgn

Attachment 4

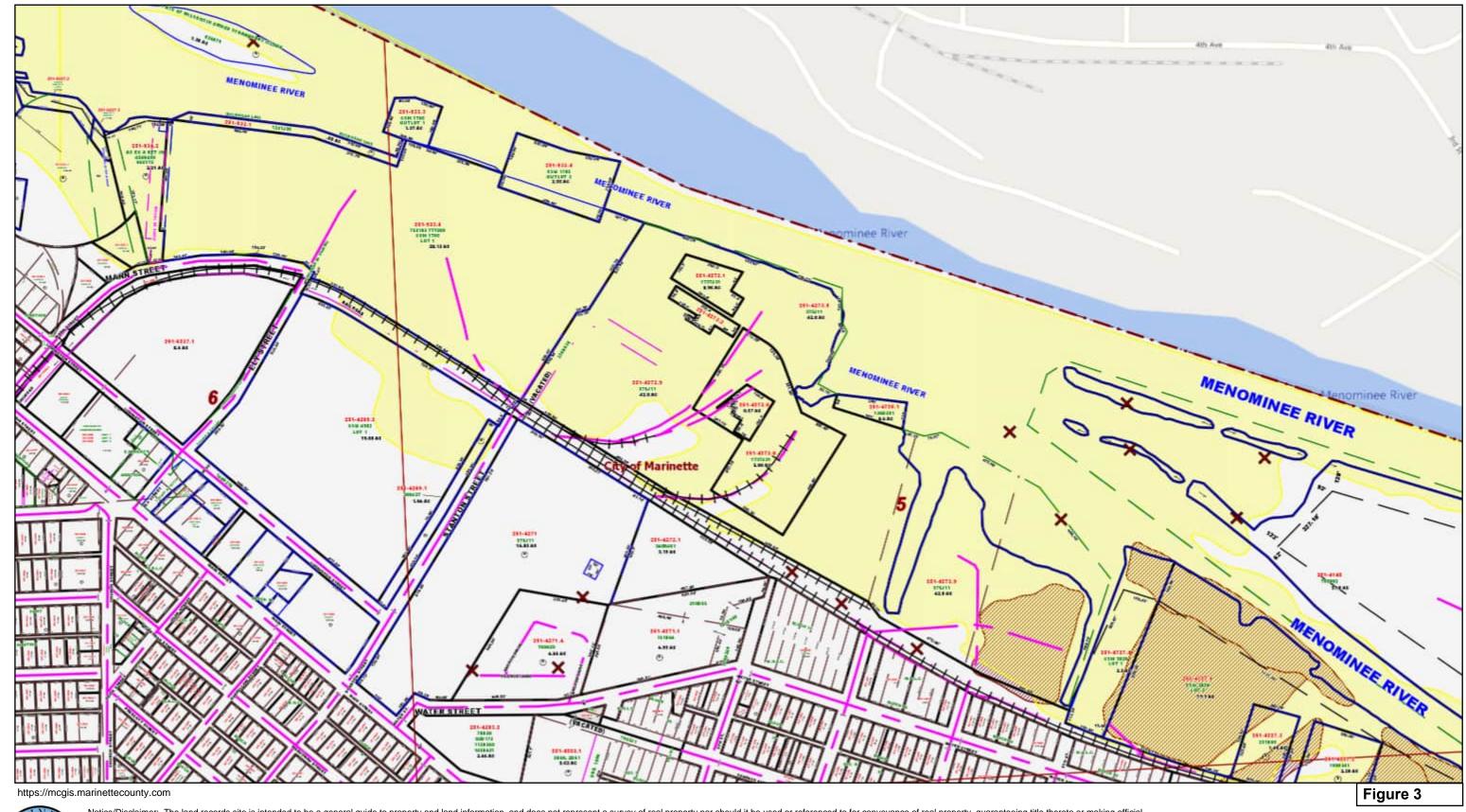


Figure 1. Site Map Tyco Fire Products LP Marinette, WI





Tyco Fire Products LP





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