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Sent: Tuesday, March 15, 2022 9:31 AM
To: Werner.Leah@epa.gov
Cc: Krueger, Sarah E - DNR; 'adrienne.korpela@jacobs.com'; 'staci.goetz@ramboll.com'; Luke, Glenn R
Subject: Former WPSC Green Bay MGP - Supplemental PDI Workplan
Attachments: PDI WP Add 2 Memo FINAL.pdf

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Leah,

As discussed at our last project update call, please find attached for your review the supplemental PDI workplan for additional soil borings and sampling in the north parking lot area of OU1. At this time, we have the drillers scheduled for the week of 4/11. If we could get your feedback on the workplan in time to facilitate that schedule it would be mot appreciated. Please do not hesitate to contact me with any questions.

Thanks,

Frank Dombrowski
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Minnesota Energy Resources, Peoples Gas and North Shore Gas*

MEMO

To: Frank Dombrowski - WEC Energy Group
From: Abby Small and Staci Goetz – Ramboll
cc: Glenn Luke – WEC Energy Group
Re: Pre-Design Investigation Work Plan Addendum No. 2, Revision 0
 Green Bay Former Manufactured Gas Plant, Green Bay, Wisconsin
 Wisconsin Public Service Corporation

BACKGROUND AND OBJECTIVE

Ramboll has prepared this Pre-Design Investigation Work Plan, Addendum 2 (PDIWP Addendum 2) on behalf of Wisconsin Public Service Corporation (WPSC) for a portion of the upland operable unit (OU1) of the Green Bay Former Manufactured Gas Plant (MGP). This investigation is to augment information collected under the USEPA-approved August 2020 Pre-Design Investigation Work Plan (PDIWP) (Ramboll, 2020) and support design for an early removal action in the upland north parking lot area. Soil sample collection is proposed to begin in early April 2022 pending work plan approval.

Preliminary discussions with potential developers indicate an interest in a mixed-use development on the northern portion of the property owned by WPSC, north of Utility Court and East of the Annex Building. This proposed development may consist of residential housing, commercial uses, green space and parking. By conducting an early removal action in this area in advance of development construction, WPSC will address impacted soil potentially encountered during foundation construction and potential exposure pathways the construction team or building occupants may encounter.

Based on a review of site data collected to date and the preliminary redevelopment plan for residential use, the proposed supplemental PDI activities are intended to address the remaining data gaps for the northern half of the upland portion of the site. PDI data collected will be utilized to prepare a Removal Action Work Plan (RAWP) for an early removal action in the north parking lot. For the purposes of the early removal action, removal and off-site disposal of soil identified as principal threat waste as well as removal and off-site disposal of the top four feet of surface soil in the main parking lot and removal and off-site disposal of the top two feet of surface soil in the Riverwalk area and import of clean soil to address the direct contact pathway will be proposed in a Letter of Intent that will be submitted separately.

CURRENT DATA GAPS

This supplemental PDI focuses on refining the remaining limits of principal threat waste. Because surface soil (0-4 feet in main parking lot and 0-2 feet in the Riverwalk) will be removed throughout the north parking lot, additional delineation of direct contact screening level exceedances is not proposed. For the purposes of

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this PDI, a definition of principal threat waste consistent with the definition recently used at WPSC's Marinette Former MGP will be utilized (accounting for the difference in proposed land use – residential versus industrial) and will be defined as soil that meets one or more of the following metrics:

- Non-aqueous phase liquid (NAPL) identified as separated liquid.
- Oil-coated or oil-wetted soil.
- Highly adsorbed phase concentrations of constituents of concern (COCs) exceeding a lifetime incremental cancer risk (CR) of 10^{-3} or a hazard index (HI) of 10 under applicable, residential land use assumptions.

Previously installed soil borings that meet the above definition of principal threat waste are shown on Figure 1. A summary of oil-wetted or oil-coated material observed in previous soil borings is provided on Table 1. Analytical data is provided in Table 2 and Table 3. Note that data collected through May 2020 was previously reported in the September 2020 Upland Remedial Investigation Data Summary Report – Revision 0 (RI Data Summary Report) (Ramboll, 2020b). PDI data collected between September 2020 and November 2020 has been provided in monthly progress reports to USEPA, but not in a formal report. All data were submitted to USEPA via email transmittal on March 1, 2022. Following the implementation of this work plan, a full synopsis of September 2020 through April 2022 sampling activities and results including risk calculations will be provided in a PDI Evaluation Report included with the RAWP. A full discussion of sampling and results are not provided herein. Results are reported as necessary to understand proposed additional PDI data collection activities.

As shown on Figure 1, the extent of principal threat waste is generally limited to the areas surrounding former Excavation Area 3. The following data gaps have been identified as the preliminary remedial action design for an early removal action Letter Of Intent (LOI) is being initiated:

- Refine the limits of principal threat waste identified for removal and off-site disposal. The following borings are proposed to address this data gap:
 - Two additional borings (SB-612 and SB-613) to the southwest of borings SB-553 and SB-589 to bound the oil-wetted/oil-coated remedial area.
 - Although oil-wetted/oil-coated material was not identified in the sidewall samples of Excavation Area 4 (Figure 1), the adsorbed phase COCs exceed a Residential HI of 10 (risk calculations provided in the RI Data Summary Report) primarily driven by concentrations of total cyanide. The extents of the Residential HI > 10 are delineated by borings SB-403 and SB-404, but further refinement through the installation of SB-617, SB-618, and SB-619 is proposed to define the scope of the remedial action in this area.
- Determine if principal threat waste remains within Excavation Area 3 or has re-affected the thermally treated soil backfill placed during the 2003 remedial action. Monitoring well MW-411AR is screened mainly within the thermally treated backfill within Excavation Area 3 (Figure 2). As reported in the RI Data Summary Report, concentrations of benzene exceed Wisconsin Groundwater Risk Assessment Framework (RAF) Screening Levels (SLs). While the concentrations have remained stable with time, they remain above the SL. Based on these groundwater concentrations, it is unknown whether principal threat waste either remains within Excavation Area 3 (e.g. within clay fractures) or has re-affected the thermally treated soil backfill. Three soil borings (SB-614, SB-615, and SB-616) are proposed to be installed within Excavation Area 3 to address this data gap.
- Confirm the absence of principal threat waste in areas where limited investigation has occurred, and redevelopment is slated to occur (i.e. gas holder and the southeast corner of the north parking lot –

Figure 1). Nine soil borings (SB-609, SB-610, SB-611, SB-620, SB-621, SB-622, SB-623, SB-624, and SB-625, Figure 1) are proposed to address this data gap.

PROPOSED SUPPLEMENTAL SAMPLING ACTIVITIES

Based on the discussion above, additional investigation will be performed to complete delineation of the nature and extent of principal threat waste. The supplemental PDI activities described below will be performed in accordance with the site-specific information included in the Site Specific Work Plan (SSWP), Revision 2 (NRT, 2015A; NRT, 2015B), the Multi-Site Field Sampling Plan (FSP) – Revision 4 (IBS, 2008), and the PDIWP Revision 1 (Ramboll, 2020a), except where noted.

Soil Boring Advancement and Sampling Methods

Soil borings will be installed at the primary and secondary soil boring locations where data gaps have been identified as shown on Figure 1 and described above. Both primary and secondary soil borings will be advanced in the field and soil samples will be collected to limit the number of mobilizations needed of the drill rig. Soil samples collected from the primary borings will be run for laboratory analysis as described below. Soil samples collected from the secondary borings will be submitted to the analytical laboratory and placed on hold¹ pending the results of the primary soil borings. The vertical and horizontal extent evaluation will involve advancing soil borings for visual observations and evaluation of analytical exceedances of risk threshold criteria. Soil borings will be advanced using a direct-push method. Unless otherwise noted, sampling will be continuous, to define the presence/absence and vertical extent of affected soil at each boring location and extend a minimum of 5-ft into confining clay layer or to a depth of 20-ft bgs, whichever is achieved first. For the purpose of guiding PDI fieldwork, the vertical and horizontal extent of principal threat waste will be considered delineated if:

- no oil-coated or oil-wetted observations are present for two consecutive sample intervals (e.g., 4-feet) or into top of clay; and
- for the evaluation of risk criteria, a Residential CR is less than 10^{-3} and Residential HI is less than 10 within one sample interval.

All borings advanced as part of the PDI will be continuously logged, following Multi-Site standard operating procedure (SOP) SAS-05-02, the presence of fill material, moisture content, photoionization detector readings, the nature of each geologic unit encountered, and visual and olfactory observations indicating the presence of NAPL (e.g., oil-coated, or oil-wetted). Soil boring locations will be recorded per Multi-Site SOP SAS-03-03, and will be abandoned following the methods described in Multi-Site SOP SAS-05-05. Field equipment will be calibrated prior to use, as required by Multi-Site SOP SAS-02-01 from the Multi-Site FSP.

Subsurface soil samples will be collected from all delineation borings as follows:

- For borings that show no visual, olfactory, or photoionization detector (PID) indication of impacts, one sample within the 2-foot interval above the clay confining layer will be collected.
- For borings that indicate the presence of contamination (through visual, olfactory, or PID indication), a sample of impacted material will be collected. A second sample will also be collected below the interval(s)

¹ Analytes that could potentially exceed their hold times while the samples from primary borings are being analyzed will be extracted so hold times will not be exceeded for the samples collected from secondary borings.

of potential MGP residuals, to document vertical extent. A third sample will be collected from within the 2-foot interval above the clay confining layer if not included in the other samples.

No samples will be collected from the surface interval (0-4 ft) because the surface interval is slated for removal and offsite disposal as part of the early removal action.

All soil samples will be submitted to a Wisconsin certified laboratory (Pace Analytical of Green Bay, Wisconsin or EurofinsTest America, Chicago, IL)² for constituents of potential concern (COPCs) identified in the SSWP Revision 2 including:

- Petroleum volatile organic compounds (PVOCs) via USEPA Method 8260 (Benzene, Ethylbenzene, Toluene, Total Xylenes, 1,2,4-Trimethylbenzene)
- Polycyclic aromatic hydrocarbons (PAHs) via USEPA Method 8270 (1-Methylnaphthalene, 2-Methylnaphthalene, Acenaphthene, Acenaphthylene, Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(g,h,i)perylene, Benzo(k)fluoranthene, Chrysene, Dibenz(a,h)anthracene, Fluoranthene, Fluorene, Indeno(1,2,3-cd)pyrene, Naphthalene, Phenanthrene, Pyrene)
- Total Metals via USEPA Method 6020A (Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver) and total mercury via USEPA Method 7471.
- Total cyanide via USEPA Method 9012B

A sampling and analysis plan summary is presented in Table 4.

Quality control (QC) samples will be collected as required by Multi-Site FSP SOP SAS-04-03. Samples will be labeled and packaged in accordance with Multi-Site FSP SOP SAS-03-01 and shipped using chain-of-custody procedures described in Multi-Site FSP SOP SAS-03-02. Equipment will be decontaminated after use in accordance with Multi-Site FSP SOP SAS-04-04.

Schedule and Reporting

Soil sample collection is proposed to begin in early April 2022 pending work plan approval. Results of the supplemental PDI will be presented in a PDI Evaluation Report included with the RAWP for early removal action.

References

Integrays Business Support, 2008. Multi-Site Field Sampling Plan, Revision 4, Remedial Investigation/Feasibility Study, Former Manufactured Gas Plant Sites, CERCLA V-W-06-C-847. September.

NRT, 2015a. Site Specific Work Plan Revision 2, Green Bay Former MGP, Green Bay, Wisconsin. March 20.

NRT, 2015b. Site Specific Work Plan Revision 2, Modified October 2015, Green Bay Former MGP, Green Bay, Wisconsin. October 9.

Ramboll, 2020a. Pre-Design Investigation Work Plan Revision 1, Former Green Bay Manufactured Gas Plant Site. August 12.

² Expedited turn around times will be requested. The laboratory will be selected based on ability to support requested turn around times to meet WPSC goals for incorporating validated PDI results evaluation into the early removal action RAWP.

Ramboll, 2020b. Upland Remedial Investigation Data Summary Report, Former Green Bay Manufactured Gas Plant Site Operable Unit 1. September 18.

Attachments

Figure 1 – Principal Threat Waste Observations and Proposed Sample Location Map

Figure 2 – Shallow Groundwater Benzene Isoconcentration Map

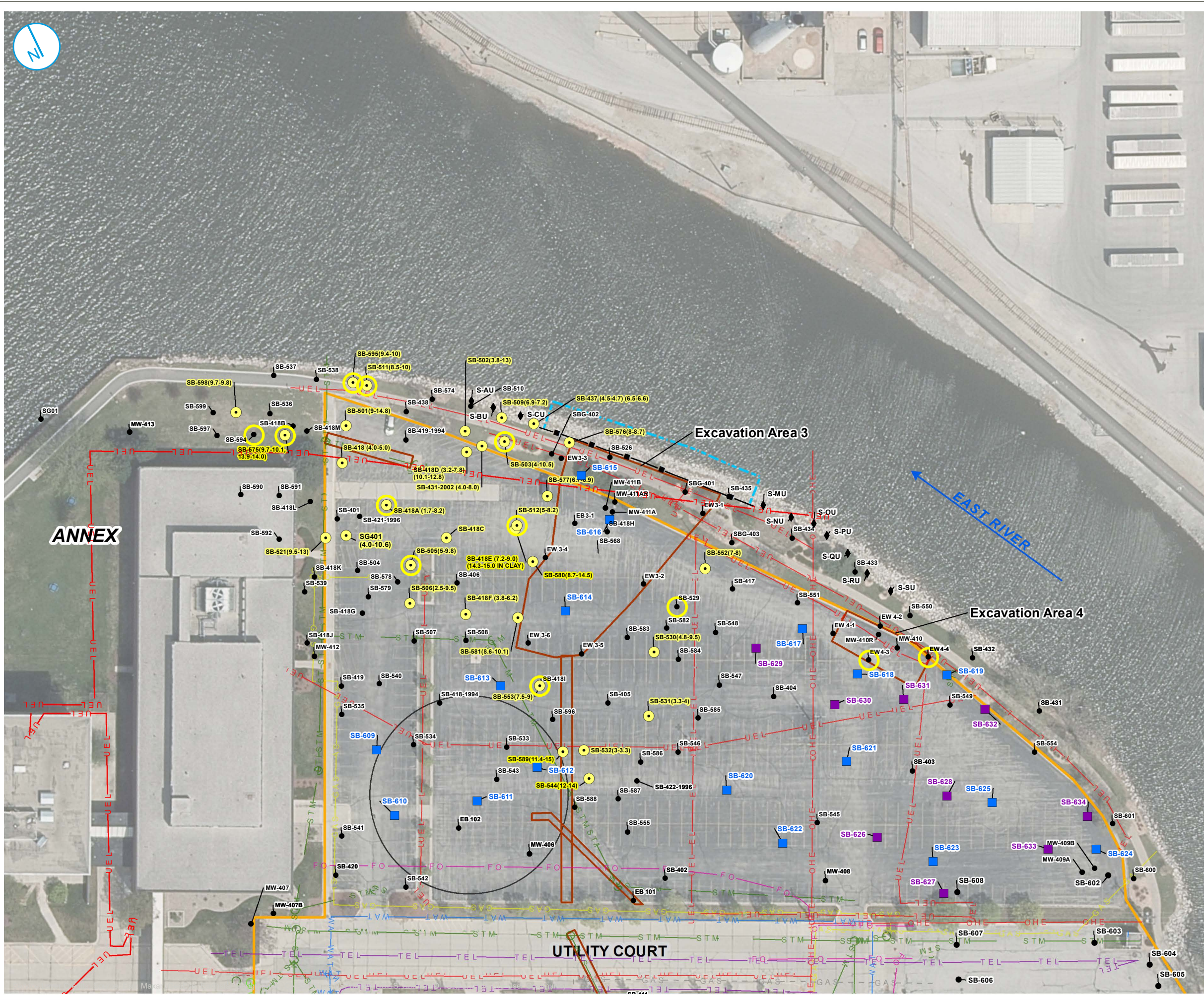
Table 1 – Summary of Post-Excavation Oil-Wetted/Oil-Coated Observations in the North Parking Lot

Table 2 – Soil SVOCs Analytical Results Compared to Residential and Industrial SLs - North Parking Lot

Table 3 – Soil VOCs and Inorganic Analytical Results Compared to Residential and Industrial SLs - North Parking Lot

Table 4 – Sampling and Analysis Plan

FIGURES



- OIL WETTED-COATED MATERIAL
- SOIL BORING LOCATION
- ◆ 2017 VISUAL BORING - NO OIL-WETTED/OIL-COATED MATERIAL OBSERVED
- RESIDENTIAL CANCER RISK > 1E-3 OR HAZARD INDEX > 10
- SHEET PILE WALL
- SHORELINE EXCAVATION EXTENT (REMEDIAL ACTION COMPLETED IN 2018)
- FORMER STRUCTURE
- SOIL REMEDIATION EXCAVATION AREAS (2003)
- ← RIVER FLOW DIRECTION
- CAP MAINTENANCE
- PRIMARY PROPOSED SOIL BORING
- SECONDARY PROPOSED SOIL
- FIBER OPTIC LINE
- GAS LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- TELEPHONE LINE
- WATER LINE
- UNDERGROUND ELECTRIC LINE
- OVERHEAD ELECTRIC LINE
- ABANDONED GAS LINE

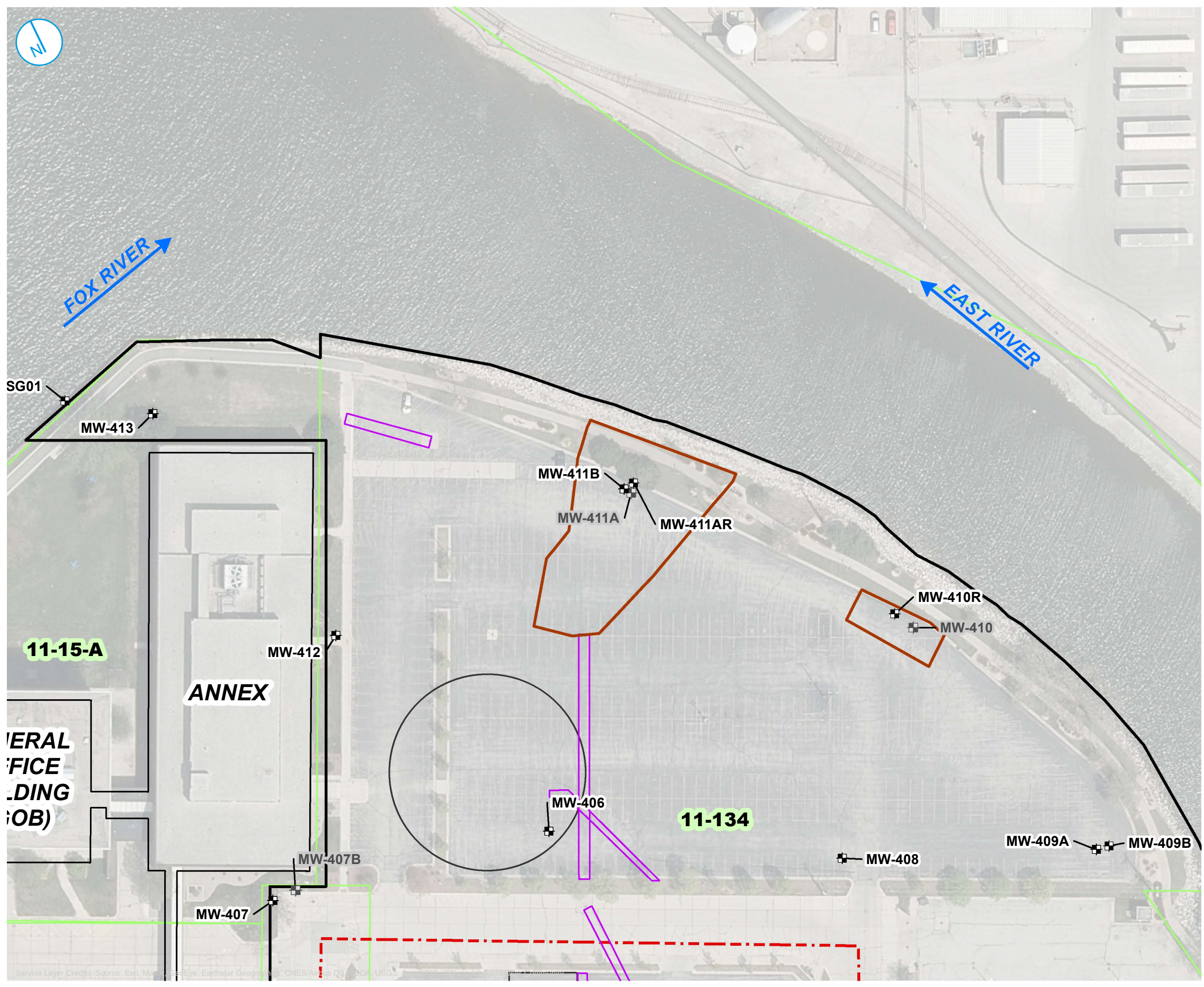
SB418 (4.0-5.0) SAMPLE ID AND INTERMITTENT NAPL DEPTH IN FEET BELOW GROUND SURFACE



PRINCIPAL THREAT WASTE OBSERVATIONS AND PROPOSED SAMPLE LOCATION MAP

FIGURE 1





- MONITORING WELL/STAFF GAUGE LOCATION
- ABANDONED MONITORING WELL LOCATION
- FORMER STRUCTURE
- SOIL REMEDIATION EXCAVATION AREAS (2003)
- SOIL REMEDIATION MGP PIPING RUNS
- UPLAND SITE BOUNDARY
- FORMER MGP
- BUILDING FOOTPRINT
- TAX PARCEL



GROUNDWATER MONITORING LOCATIONS - NORTH PARKING LOT

FORMER GREEN BAY MANUFACTURED GAS PLANT
 WISCONSIN PUBLIC SERVICE CORPORATION
 CITY OF GREEN BAY, WISCONSIN

FIGURE 2



TABLES

Table 1. Summary of Post-Excavation Oil-Wetted/Oil-Coated Observations in the North Parking Lot

Pre-Design Investigation Work Plan, Addendum 2
 Wisconsin Public Service Corporation
 Former MGP Site - Green Bay
 700 N. Adams Steet, Green Bay, WI 54307
 BRRTS# 02-05-000254 USEPA# WIN000509948

Location ID	Top of Interval (ft bgs)	Bottom of Interval (ft bgs)	NAPL Observation	NAPL above Native Clay	NAPL in Native Clay
Historical and Remedial Investigation Borings					
SB-418	4.0	5.0	slight odor, oil-wetted in the form of weathered tar-like material with taffy-like texture at bottom of sleeve	Y	N
SB-418A	1.7	6.2	odor, oil-wetted	N	N
SB-418A	6.2	7.2	odor, oil-wetted, sheen	N	N
SB-418A	7.2	8.2	odor, oil-wetted	N	N
SB-418C	4.8	5.0	odor, stained, oil-wetted, weathered tar-like material	Y	N
SB-418C	5.0	6.2	odor, oil-wetted in the form of weathered tar-like material	Y	N
SB-418C	6.2	10.7	odor, oil-wetted, sheen	Y	N
SB-418D	3.2	6.5	odor, stained to oil-wetted	Y	N
SB-418D	6.5	6.9	strong odor, oil-wetted	Y	N
SB-418D	6.9	7.8	odor, oil-wetted in the form of trace droplets	Y	N
SB-418D	10.1	12.8	strong odor, oil-wetted, sheen	Y	N
SB-418E	7.2	9.0	strong odor, stained, oil-wetted wood (produces droplets when squeezed)	Y	N
SB-418E	14.3	15.0	no odor, trace weathered tar-like material in fractures (larger fractures may have droplets of liquid material in center of weathered material)	N	Y
SB-418F	3.8	4.1	odor, stained, oil-wetted in the form of weathered tar-like material	Y	N
SB-418F	4.1	6.2	odor, oil-coated	Y	N
SB-431-2002	4.0	8.0	Oil stained/wetted SAND, odor.	Y	N
SB-437	4.5	4.7	no odor, oil-wetted weathered tar-like material	Y	N
SB-437	6.5	6.6	no odor, oil-wetted weathered tar-like material in 1/2-inch lens	Y	N
SG-401	4.0	10.0	slight odor, oil-wetted	Y	N
SG-401	10.0	10.6	slight odor, oil-wetted, slight sheen	Y	N
Pre-Design Investigation Borings					
PDI-SB-501	9.0	11.0	oil-wetted (60-80%), 1-5mm fluid droplets, oil-coated (30-50%), sheen (0-20%), moderate odor	Y	N
PDI-SB-501	11.0	14.8	oil-coated (30-50%), 1-5mm, sheen (0-10%), moderate odor	Y	N
PDI-SB-502	3.8	6.5	oil-coated (70-90%), strong odor	Y	N
PDI-SB-502	6.5	7.5	oil-wetted to oil-coated (70-90%)	Y	N
PDI-SB-502	7.5	13.0	oil-wetted (10-30%), 1-10mm fluid droplets, oil-coated (30-50%), sheen (0-20%)	N	Y
PDI-SB-503	4.0	7.0	oil-coated (30-50%), moderate odor	Y	N
PDI-SB-503	7.0	10.5	oil-coated (60-80%), strong odor	Y	N
PDI-SB-505	5.0	6.2	oil-wetted (0-20%), fluid droplets in wood, oil-coated (30-50%), moderate odor	Y	N
PDI-SB-505	6.2	9.0	oil-coated (40-60%), moderate odor	Y	N
PDI-SB-505	9.0	9.8	oil-wetted (20-40%), fluid droplets	Y	N
PDI-SB-506	2.5	6.0	oil-coated (20-40%), strong odor	Y	N
PDI-SB-506	6.0	9.5	oil-coated (10-30%), coating decreases with depth, faint odor	Y	N
PDI-SB-509	6.9	7.2	oil-coated (10-20%), moderate odor	Y	N
PDI-SB-511	8.5	10.0	oil-wetted, weathered (hard)	Y	N
PDI-SB-512	5.0	8.2	oil-wetted to oil-coated (70-90%), 1-10mm fluid droplets, sheen (0-20%), moderate odor	Y	N
PDI-SB-521	9.5	12.5	oil-wetted (20-40%), sheen (10-20%)	Y	N
PDI-SB-521	12.5	13.0	oil-wetted (5-10%), moderate odor	Y	N



Table 1. Summary of Post-Excavation Oil-Wetted/Oil-Coated Observations in the North Parking Lot

Pre-Design Investigation Work Plan, Addendum 2
 Wisconsin Public Service Corporation
 Former MGP Site - Green Bay
 700 N. Adams Steet, Green Bay, WI 54307
 BRRTS# 02-05-000254 USEPA# WIN000509948

Location ID	Top of Interval (ft bgs)	Bottom of Interval (ft bgs)	NAPL Observation	NAPL above Native Clay	NAPL in Native Clay
Pre-Design Investigation Borings					
PDI-SB-530	4.8	5.3	oil-coated (60-80%)	Y	N
PDI-SB-530	5.3	9.5	oil-coated (30-50%), moderate odor	Y	N
PDI-SB-531	3.3	4.0	oil-coated (70-90%), faint odor	Y	N
PDI-SB-532	3.0	3.3	oil-coated (70-90%), moderate odor	Y	N
PDI-SB-544	12.0	14.0	oil-wetted to oil-coated (100%) in fractures, fluid to viscous	N	Y
PDI-SB-552	7.0	8.0	oil-wetted (10-20%), staining, moderate odor	Y	N
PDI-SB-553	7.5	8.5	oil-wetted (10-20%), moderate odor	Y	N
PDI-SB-553	8.5	9.0	oil-coated (10-30%)	Y	N
PDI-SB-575	9.7	10.0	oil-coated (35-40%), sheen (100%), moderate odor	Y	N
PDI-SB-575	13.9	14.4	oil-wetted (5-10%) in 1mm to 3mm fractures, viscous, moderate odor	N	Y
PDI-SB-576	8.0	8.7	oil-coated (5-10%), pinhead sized spots, moderate to strong odor	Y	N
PDI-SB-577	6.7	6.9	Staining (30-40%), sheen (10-20%) pinhead sized spots, moderate odor	Y	N
PDI-SB-580	8.7	10.2	oil-coated (80-100%), sheen (20%) 1mm to 3mm diameter spots, moderate odor	Y	N
PDI-SB-580	10.2	11.1	sheen (20-30%) 1mm to 3mm diameter spots	Y	N
PDI-SB-580	11.1	14.5	oil-wetted (0-5%) fractures 1mm to 3mm thick, faint odor	N	Y
PDI-SB-581	8.6	10.1	sheen (0-5%), pinhead size spots, moderate odor	Y	N
PDI-SB-589	11.4	15.0	oil-wetted (0-5%) in 2mm to 4mm diameter fractures, faint odor	N	Y
PDI-SB-595	9.4	10.0	oil-coated (0-5%), 1mm to 2mm spots, brown (10YR 3/3) staining (10-15%), moderate to strong odor	N	Y
PDI-SB-598	9.7	9.8	oil-coated (0-5%) 1mm to 2mm spots, staining (0-5%), faint to moderate odor	N	Y

Notes:

- bgs = below ground surface
- ft = foot/feet
- N = no
- NAPL = non-aqueous phase liquid
- Y = yes



Table 4. Sampling and Analysis Plan Summary

Pre-Design Investigation Work Plan, Addendum 2
 Wisconsin Public Service Corporation
 Former MGP Site - Green Bay
 700 N. Adams Street, Green Bay, WI 54307
 BRRTS# 02 05 000254 USEPA# WIN000509948

SAMPLE TYPE	SAMPLE FREQUENCY	ESTIMATED NUMBER OF SAMPLES ¹	PARAMETER	METHOD	FIELD DUPLICATES (1 extra volume)	MS/MSD (2 extra volumes)	EQUIPMENT BLANKS	TRIP BLANKS	TOTAL NUMBER OF SAMPLES	ESTIMATED NO. OF CONTAINERS	CONTAINER TYPE	MINIMUM VOLUME	PRESERVATION (Cool All Samples to 4° ± 2°C Unless 'None' Indicated)	HOLDING TIME FROM SAMPLING DATE
Subsurface Investigation per Workplan Addendum	If visual, olfactory, or PID indications of impacts: 1 within impacted interval(s), 1 immediately below impacted interval(s), 1 from bottom of boring. If no indication of impacts: 1 sample within 2-ft interval above clay	Continuous	Logging	Multi-Site SOP SAS-05-02	--									
		Up to 3 per boring	PVOCs ¹	8260	1 per 20	1 per 20	Equipment blanks will be collected at a frequency of 1 per soil sampling day with non-dedicated sampling equipment.	VOC trip blanks will accompany each cooler containing VOC samples.	Min: 26 samples collected & 17 samples analyzed; Max: 78 samples collected & analyzed	Min: 26 Max: 78	Glass Vial	2 oz.	NaSO4 and MeOH	48 hours to freeze 14 days to analyze
		Up to 3 per boring	PAHs ²	8270	1 per 20	1 per 20				Min: 26 Max: 78	Glass	4 oz.	--	14 days to extract 40 days to analyze
		Up to 3 per boring	Total Metals ³	6020A/7471	1 per 20	1 per 20				Min: 26 Max: 78	Plastic	5 oz.	--	14 days/6 months
		Up to 3 per boring	Total Cyanide	9012B	1 per 20	1 per 20				Min: 26 Max: 78	Glass	4 oz.	--	14 days

Notes:

- Petroleum volatile organic compounds (PVOCs) include benzene, ethylbenzene, toluene, total xylenes, and 1,2,4-trimethylbenzene
- Polycyclic aromatic hydrocarbon (PAHs) include 1-Methylnaphthalene, 2-Methylnaphthalene, Acenaphthene, Acenaphthylene, Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(g,h,i)perylene, Benzo(k)fluoranthene, Chrysene, Dibenz(a,h)anthracene, Fluoranthene, Fluorene, Indeno(1,2,3-cd)pyrene, Naphthalene, Phenanthrene, Pyrene
- Total Metals include arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver