RAC V TECHNICAL STATUS REPORT

December 31, 2005 to January 27, 2006

WORK ASSIGNMENT NUMBER:	201-RALR-05WE
SITE NAME:	Penta Wood Products-OU1, WI
ACTIVITY:	Long-Term Response Action
CH2M HILL JOB NUMBER:	184202
PREPARED BY:	Bill Andrae, Site Manager Keli McKenna, Assistant Site Manager
PERIOD ENDING:	January 27, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

An estimated 2.2 million gallons (MG) were treated and discharged during the reporting period. To date, a total of 41.8 MG of water have been treated. During the reporting period, the free product recovery system removed approximately 1,370 gallons of oil/water mixture, bringing the total recovered volume since March 2004 to approximately 14,944 gallons.

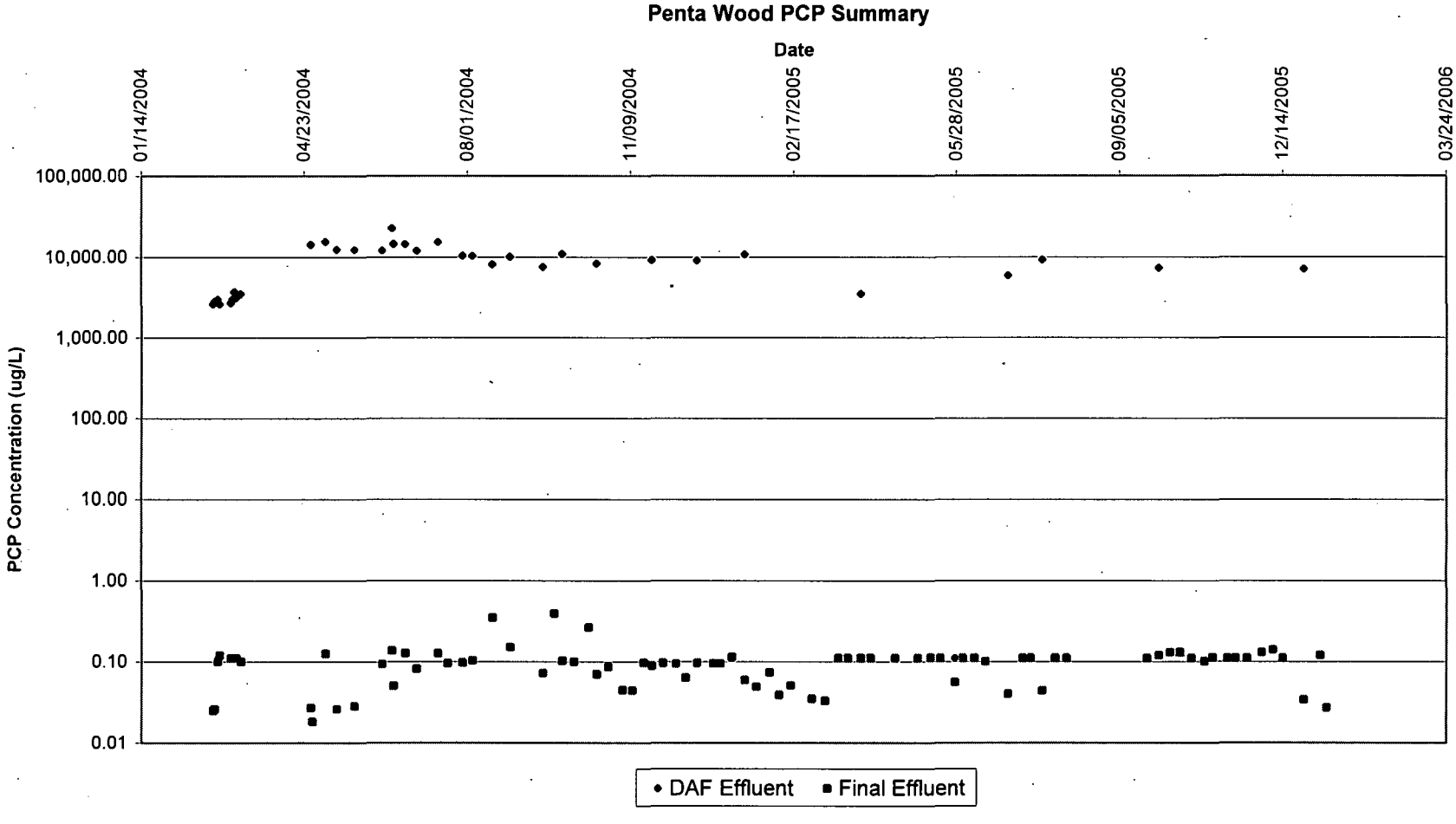
On January 3 and January 24, North Shore Environmental was onsite to load and transport 3,700 gallons of the oil/water mixture and 13.5 tons of filter cake to the approved offsite disposal facility.

On January 24, CH2M HILL discussed its responses to the recommendations for the remediation system evaluation report with USEPA and the Wisconsin Department of Natural Resources (WDNR).

Both heating pads for the free product storage tank are operating normally after being inspected and repaired by a local electrician.

CH2M HILL is waiting for the instrumentation and controls subcontractor, STS, to inspect the variable frequency drive (VFD) for the pump in Extraction Well No. 4. It appears that the pump is not operating correctly because of an issue with the VFD. The VFD for the pump will be inspected and repaired as soon as possible.

The results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling are summarized in the following chart.


Penta Wood PCP Summary
Date
01/14/2004
04/23/2004
08/01/2004
11/09/2004
02/17/2005
05/28/2005
09/05/2005
12/14/2005
03/24/2006
PCP Concentration (ug/L)
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
DAF Effluent
Final Effluent

The results of the WPDES sampling are summarized in the table on the following page. The effluent concentration of naphthalene was 37 micrograms per liter (µg/L), which is above the 8.0 µg/L monthly average. Past results for naphthalene indicate that this result may be an anomaly. Another naphthalene sample was collected on January 17 and the result for that sample will be reported in the February TSR. The table detailing results are presented at the end of the document.

Summary of Project Status					
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete
1-PP	09/30/03	09/30/03	06/30/06		85
3-DU	09/30/03	09/30/03	06/30/06		99
4-PB	09/30/03	09/30/03	06/30/06		98
5-MS	09/30/03	09/30/03	03/30/04	03/30/04	100
6-RI	09/30/03	09/30/03	03/30/04	03/30/04	100
7-CV	09/30/03	09/30/03	06/30/06		86
8-AI	09/30/03	09/30/03	06/30/06		80
9-PJ	09/30/03	09/30/03	06/30/06		85
11-CO	05/01/06		06/30/06		0

2. Problems Resolved

The free product storage tank heating pads were repaired.

3. Problem Areas and Recommended Solutions

The new groundwater pump in Extraction Well No. 4 is experiencing electrical problems. The VFD for the pump will be inspected and repaired.

Change Order Status, Subcontract No. 308 Clearwater Technologies, Inc. Change Order submitted by CH2M HILL to USEPA (under WA #201)			
CO #1	Final actual quantity adjustment for the Equipment Installation, Option Period 2	$49,034	Approved

4. Deliverables Submitted

None.

5. Activities Planned Next Reporting Period

CH2M HILL expects to conduct ongoing routine operations and maintenance (O&M) activities, including normal effluent sampling based on the substantive requirements of the WPDES permit. CH2M HILL plans on performing the following activities during the next reporting period:

- Resolve operation issue with Extraction Well No. 4 pump

At the request of USEPA, CH2M HILL will research the feasibility of delisting the filter cake in order to reduce disposal costs.

6. **Key Personnel Changes**

None.

7. **Subcontractor Services**

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company
Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Earthworks:	Darcy Brust Excavating
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	USFilter/Westates
Hazardous Waste Disposal:	North Shore Environmental
Tank Cleaning and Decontamination Services:	MidAmerica
Instrumentation and Controls:	System Technology Services, Inc.
Equipment Installation:	Clearwater Technologies, Inc.
Treatment System Chemicals:	Glacier Pure, Inc.
Backwash System:	Environmental Field Services, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells

8. **Travel**

None.

9. **Laboratories**

The 2005–2006 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. **Project Performance**

The treatment system modifications added in 2003–2004 have significantly improved the overall performance of the granular activated carbon system. The carbon beds are effectively adsorbing dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 µg/L.

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04		7.0									0.265B													
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
04-Nov-04		7.0									0.0447J													
10-Nov-04		7.0									0.0442J													
17-Nov-04		7.0									0.0971U													
22-Nov-04	9,140	7.0	--	--	0.0935U	0.787JB	--	--	--	0.82U	0.0900J	9.43U	1.0U	0.5U	--	--	--	0.727B	--	--	--	--	--	--
29-Nov-04		7.0									0.0962U													
07-Dec-04		7.0									0.0943U													
13-Dec-04		7.0									0.0637J													
20-Dec-04	9,100	7.0	4.0U	27	0.0962U	0.905B	1.0U	1.0U	2.0U	1.17U	0.0962U	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	0.550B	1.66B	66.7	8.35B	2670	--	--
30-Dec-04		7.0									0.0952U													
03-Jan-05		7.0									0.0952U													
10-Jan-05		7.0									0.114B													
18-Jan-05	10,800B	7.0	--	--	0.120	0.923B	--	--	--	2.65U	0.0595JB	9.52U	5.0U	0.5U	--	--	--	0.454B	--	--	--	--	--	--
25-Jan-05		7.0									0.049J													
02-Feb-05		7.0									0.074J													
08-Feb-05		7.0									0.039J													
15-Feb-05		7.0									0.051J													
28-Feb-05	--	7.0	--	--	0.096U	0.67B	--	--	--	0.43U	0.035J	4.7U	0.94U	0.5U	--	--	--	14	--	--	--	--	--	--
08-Mar-05	--	7.0	--	--	--	--	--	--	--	--	0.033J	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Mar-05		7.0									0.11U													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
22-Mar-05	3,500	7.0	5.0U	22	0.094U	0.37B	1.0U	1.0U	2.0U	1.4U	0.11U	4.7U	0.93	0.5U	1.0U	1.0U	1.0U	1.0U	7.4B	44	50U	2,400	ND	ND
30-Mar-05		7.0									0.11U													
05-Apr-05		7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR
26-Jan-06	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR

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Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
– = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit

RAC V TECHNICAL STATUS REPORT

January 28, 2006 to February 24, 2006

WORK ASSIGNMENT NUMBER:	201-RALR-05WE
SITE NAME:	Penta Wood Products-OU1, WI
ACTIVITY:	Long-Term Response Action
CH2M HILL JOB NUMBER:	184202
PREPARED BY:	Bill Andrae, Site Manager Mike Lehman, Assistant Site Manager
PERIOD ENDING:	February 24, 2006

COPIES:

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WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

An estimated 745,000 gallons were treated and discharged during the reporting period. To date, a total of 42.5 million gallons of water have been treated. During the reporting period, the free product recovery system removed approximately 715 gallons of oil/water mixture, bringing the total recovered volume since March 2004 to approximately 15,659 gallons.

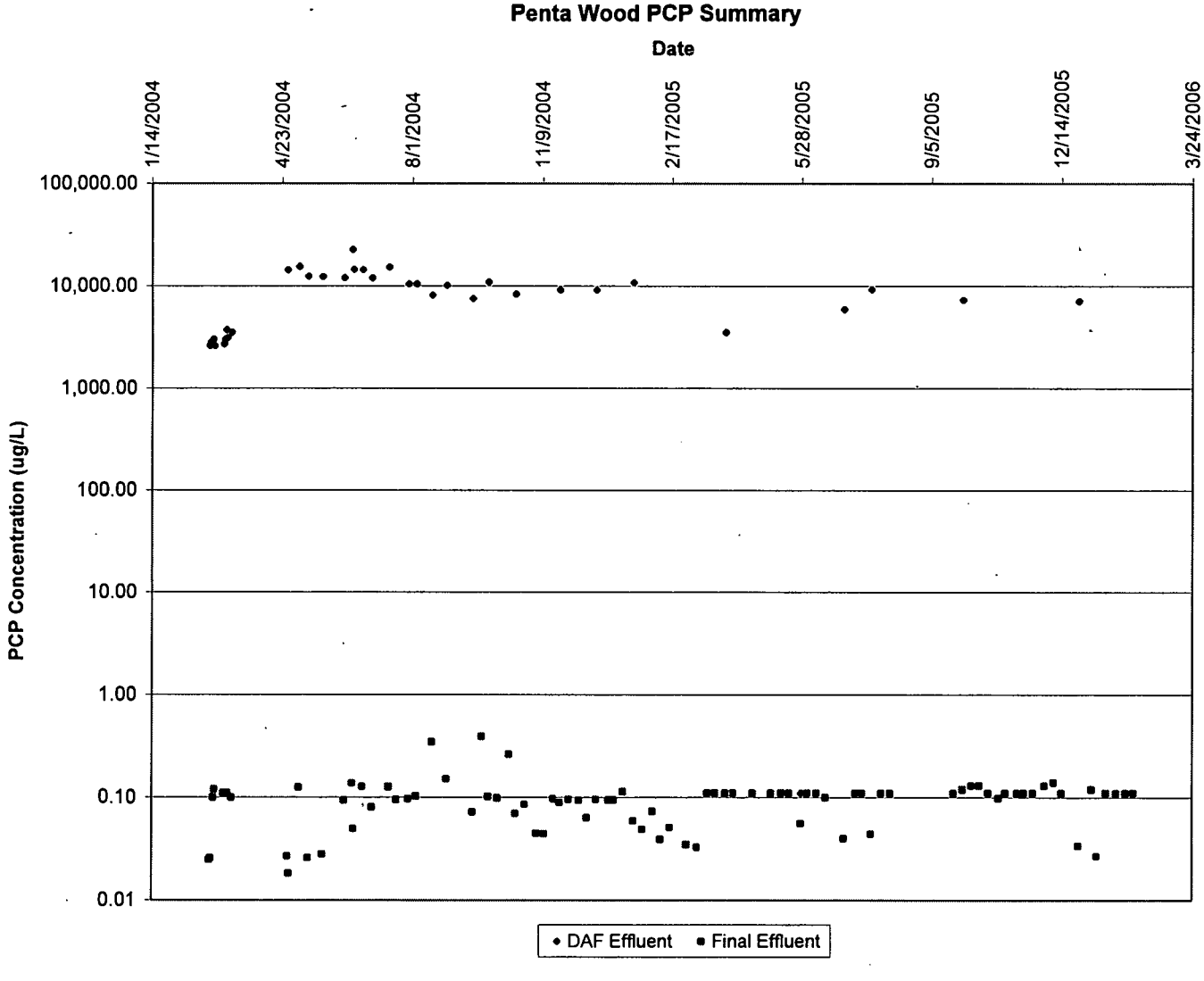
On February 14, US Filter changed out approximately 10,000 lbs of granular activated carbon.

On February 20, Champion Coatings, a lower-tier subcontractor to US Filter was onsite to reline the small carbon vessel and one large carbon vessel with new epoxy. The original liner was damaged by the previous carbon changeout subcontractor, who was fired for poor performance and safety concerns. The alignment of work was completed on February 23, but there is a 1 week cure time for the epoxy before it could be filled with carbon.

On February 17, North Shore Environmental was onsite to load and transport 22,500 lbs of granular activated carbon to the approved offsite disposal facility.

CH2M HILL is waiting for the instrumentation and controls subcontractor, STS, to inspect the variable frequency drive (VFD) for the pump in Extraction Well No. 4. It appears that the pump is not operating correctly because of an issue with the VFD. The VFD will be inspected the week of March 6 and repaired as soon as possible.

The results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling are summarized in the following chart.


Penta Wood PCP Summary
Date
1/14/2004
4/23/2004
8/1/2004
11/9/2004
2/17/2005
5/28/2005
9/5/2005
12/14/2005
3/24/2006
PCP Concentration (ug/L)
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
DAF Effluent
Final Effluent

Two of the effluent samples collected during the reporting period were analyzed for napthanlene. Both samples indicated naphthalene was not present above the laboratory reporting limit. The table detailing the WPDES sampling results is presented at the end of the document.

Summary of Project Status					
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete
1-PP	09/30/03	09/30/03	06/30/06		88
3-DU	09/30/03	09/30/03	06/30/06		99
4-PB	09/30/03	09/30/03	06/30/06		98
5-MS	09/30/03	09/30/03	03/30/04	03/30/04	100
6-RI	09/30/03	09/30/03	03/30/04	03/30/04	100
7-CV	09/30/03	09/30/03	06/30/06		88
8-AI	09/30/03	09/30/03	06/30/06		80
9-PJ	09/30/03	09/30/03	06/30/06		88
11-CO	05/01/06		06/30/06		0

2. Problems Resolved

On February 15, Champion Coatings (a subcontractor of US Filter) inspected the inside of the prefilter and GAC 1 vessel to evaluate the integrity of the epoxy coating. Champion determined both vessels required re-lining. On February 20, Champion Coatings returned to the site to sand blast both vessels. After sand blasting, Champion applied three layers of epoxy to the vessels. The work was completed on February 23.

3. Problem Areas and Recommended Solutions

The new groundwater pump in Extraction Well No. 4 is experiencing electrical problems. The VFD for the pump will be inspected and repaired.

Change Order Status, Subcontract No. 308 Clearwater Technologies, Inc. Change Order submitted by CH2M HILL to USEPA (under WA #201)			
CO #1	Final actual quantity adjustment for the Equipment Installation, Option Period 2	$49,034	Approved

4. Deliverables Submitted

None.

5. Activities Planned Next Reporting Period

CH2M HILL expects to conduct ongoing routine operations and maintenance (O&M) activities, including normal effluent sampling based on the substantive requirements of the WPDES permit. CH2M HILL plans on performing the following activities during the next reporting period:

- Resolve operation issue with Extraction Well No. 4 pump
- Install sand filter on influent water line

6. **Key Personnel Changes**

None.

7. **Subcontractor Services**

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company
Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Earthworks:	Darcy Brust Excavating
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	USFilter/Westates
Hazardous Waste Disposal:	North Shore Environmental
Tank Cleaning and Decontamination Services:	MidAmerica
Instrumentation and Controls:	System Technology Services, Inc.
Equipment Installation:	Clearwater Technologies, Inc.
Treatment System Chemicals:	Glacier Pure, Inc.
Backwash System:	Environmental Field Services, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells

8. **Travel**

Travel charges for Carolyn Fehn were inadvertently charged to this Work Assignment. These costs will be transferred to Oconomowoc, WA No. 236-RALR-05M8 during the next reporting period.

9. **Laboratories**

The 2005–2006 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. **Project Performance**

The treatment system modifications added in 2003–2004 have significantly improved the overall performance of the granular activated carbon system. The carbon beds are effectively adsorbing dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 µg/L.

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000 B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900 B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04		7.0									0.265B													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													
04-Nov-04		7.0									0.0447J													
10-Nov-04		7.0									0.0442J													
17-Nov-04		7.0									0.0971U													
22-Nov-04	9,140	7.0	--	--	0.0935U	0.787JB	--	--	--	0.82U	0.0900J	9.43U	1.0U	0.5U	--	--	--	0.727B	--	--	--	--	--	--
29-Nov-04		7.0									0.0962U													
07-Dec-04		7.0									0.0943U													
13-Dec-04		7.0									0.0637J													
20-Dec-04	9,100	7.0	4.0U	27	0.0962U	0.905B	1.0U	1.0U	2.0U	1.17U	0.0962U	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	0.550B	1.66B	66.7	8.35B	2670	--	--
30-Dec-04		7.0									0.0952U													
03-Jan-05		7.0									0.0952U													
10-Jan-05		7.0									0.114B													
18-Jan-05	10,800 B	7.0	--	--	0.120	0.923B	--	--	--	2.65U	0.0595JB	9.52U	5.0U	0.5U	--	--	--	0.454B	--	--	--	--	--	--
25-Jan-05		7.0									0.049J													
02-Feb-05		7.0									0.074J													
08-Feb-05		7.0									0.039J													
15-Feb-05		7.0									0.051J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
28-Feb-05	--	7.0	--	--	0.096U	0.67B	--	--	--	0.43U	0.035J	4.7U	0.94U	0.5U	--	--	--	14	--	--	--	--	--	--
08-Mar-05	--	7.0	--	--	--	--	--	--	--	--	0.033J	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Mar-05		7.0									0.11U													
22-Mar-05	3,500	7.0	5.0U	22	0.094U	0.37B	1.0U	1.0U	2.0U	1.4U	0.11U	4.7U	0.93	0.5U	1.0U	1.0U	1.0U	1.0U	7.4B	44	50U	2,400	ND	ND
30-Mar-05		7.0									0.11U													
05-Apr-05		7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--
06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06		7.0	--	--	0.098U	0.81B	--	--	--	--	0.11U	4.9U	0.97U	--	--	--	--	--	--	--	--	--	--	--
25-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
01-Feb-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
07-Feb-06	--	7.0	--	--	0.097U	0.67B	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--

Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
-- = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit

RAC V TECHNICAL STATUS REPORT

February 25, 2006 to March 31, 2006

WORK ASSIGNMENT NUMBER:	201-RALR-05WE
SITE NAME:	Penta Wood Products-OU1, WI
ACTIVITY:	Long-Term Response Action
CH2M HILL JOB NUMBER:	184202
PREPARED BY:	Bill Andrae, Site Manager Mike Lehman, Assistant Site Manager
PERIOD ENDING:	March 31, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

An estimated 1.88 million gallons of groundwater were treated and discharged during the reporting period. To date, a total of 44.38 million gallons of water have been treated. During the reporting period, the free product recovery system removed approximately 330 gallons of oil/water mixture, bringing the total recovered volume since March 2004 to approximately 15,989 gallons.

On February 28, a filter was installed on the potable water line to remove sand particles and protect downstream plumbing fixtures.

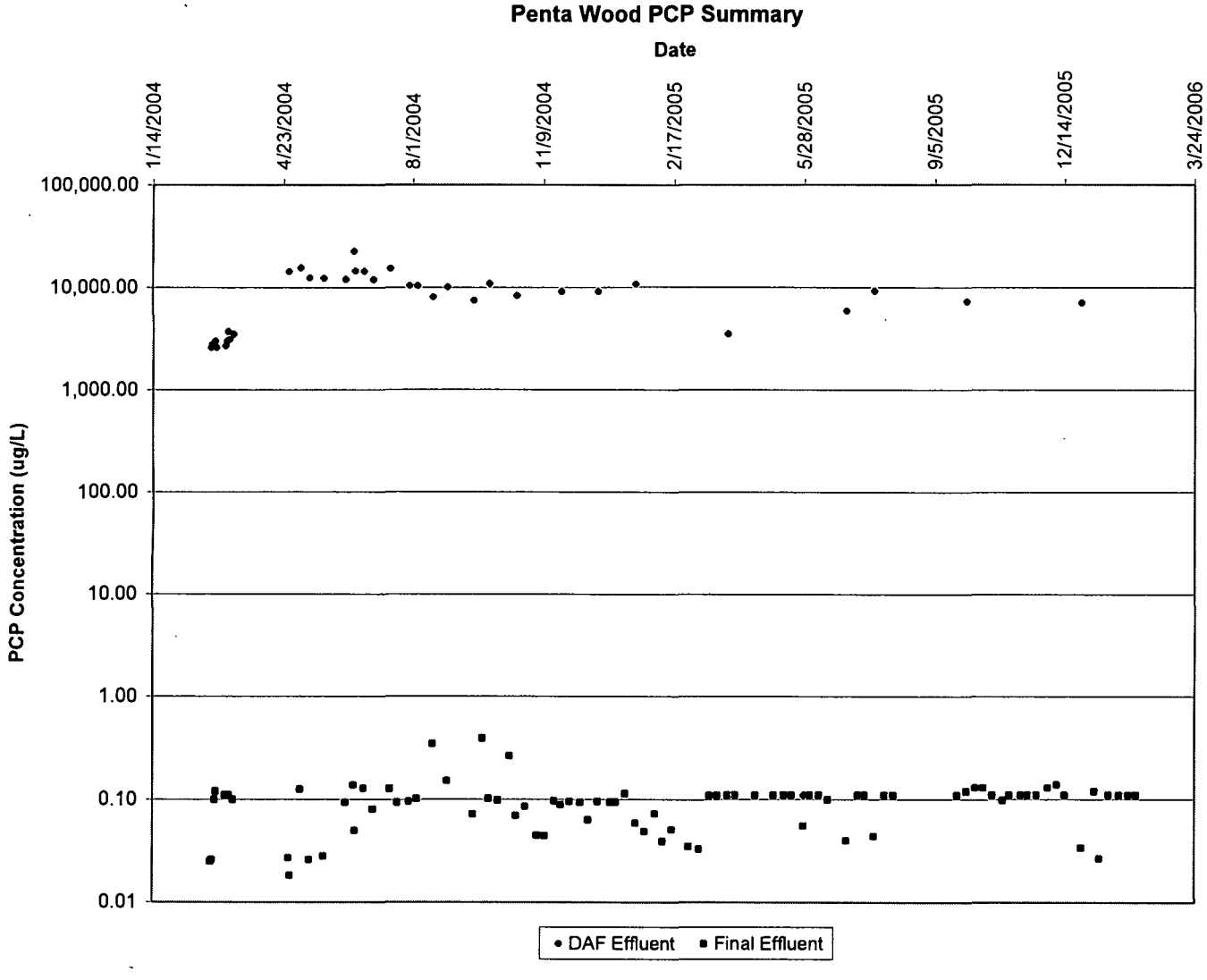
On March 7, US Filter was onsite to refill the small carbon vessel and one large carbon vessel, which had new epoxy liners installed during the last reporting period. The carbon was soaked overnight, and the system was restarted on March 8.

On March 9, the fire extinguishers received their annual inspection and maintenance.

On March 13, a severe snowstorm occurred at the site. The operator was instructed to shut the system down, go home, and restart the system after the storm passed.

CH2M HILL is waiting for the instrumentation and controls subcontractor, STS, to inspect the variable frequency drive (VFD) for the pump in Extraction Well No. 4. It appears that the pump is not operating correctly because of an issue with the VFD. STS will also inspect and repair Odorous Air Fan No. 1, which stopped working during the severe snowstorm.

The results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling are summarized in the following chart.


Penta Wood PCP Summary
Date
1/14/2004
4/23/2004
8/1/2004
11/9/2004
2/17/2005
5/28/2005
9/5/2005
12/14/2005
3/24/2006
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
PCP Concentration (ug/L)
DAF Effluent
Final Effluent

Two of the effluent samples collected during the reporting period were analyzed for napthanlene. Both samples indicated naphthalene was not present above the laboratory reporting limit. The table detailing the WPDES sampling results is presented at the end of the document.

Summary of Project Status					
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete
1-PP	09/30/03	09/30/03	06/30/06		91
3-DU	09/30/03	09/30/03	06/30/06		99
4-PB	09/30/03	09/30/03	06/30/06		98
5-MS	09/30/03	09/30/03	03/30/04	03/30/04	100
6-RI	09/30/03	09/30/03	03/30/04	03/30/04	100
7-CV	09/30/03	09/30/03	06/30/06		88
8-AI	09/30/03	09/30/03	06/30/06		80
9-PJ	09/30/03	09/30/03	06/30/06		91
11-CO	05/01/06		06/30/06		0

2. Problems Resolved

None.

3. Problem Areas and Recommended Solutions

The new groundwater pump in Extraction Well No. 4 is experiencing electrical problems. The VFD for the pump will be inspected and repaired.

Change Order Status, Subcontract No. 308 Clearwater Technologies, Inc. Change Order submitted by CH2M HILL to USEPA (under WA #201)			
CO #1	Final actual quantity adjustment for the Equipment Installation, Option Period 2	$49,034	Approved

4. Deliverables Submitted

None.

5. Activities Planned Next Reporting Period

CH2M HILL plans to submit the annual report for the site.

CH2M HILL expects to conduct ongoing routine operations and maintenance (O&M) activities, including normal effluent sampling based on the substantive requirements of the WPDES permit. CH2M HILL plans on performing the following activities during the next reporting period:

- Resolve the operation issue with the Extraction Well No. 4 pump
- Repair Odorous Air Fan No. 1

6. **Key Personnel Changes**

None.

7. **Subcontractor Services**

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company
Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Earthworks:	Darcy Brust Excavating
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	USFilter/Westates
Hazardous Waste Disposal:	North Shore Environmental
Tank Cleaning and Decontamination Services:	MidAmerica
Instrumentation and Controls:	System Technology Services, Inc.
Equipment Installation:	Clearwater Technologies, Inc.
Treatment System Chemicals:	Glacier Pure, Inc.
Backwash System:	Environmental Field Services, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells

8. **Travel**

None.

9. **Laboratories**

The 2005-2006 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. **Project Performance**

The treatment system modifications added in 2003-2004 have significantly improved the overall performance of the granular activated carbon system. The carbon beds are effectively adsorbing dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 µg/L.

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000 B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900 B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04		7.0									0.265B													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													
04-Nov-04		7.0									0.0447J													
10-Nov-04		7.0									0.0442J													
17-Nov-04		7.0									0.0971U													
22-Nov-04	9,140	7.0	--	--	0.0935U	0.787JB	--	--	--	0.82U	0.0900J	9.43U	1.0U	0.5U	--	--	--	0.727B	--	--	--	--	--	--
29-Nov-04		7.0									0.0962U													
07-Dec-04		7.0									0.0943U													
13-Dec-04		7.0									0.0637J													
20-Dec-04	9,100	7.0	4.0U	27	0.0962U	0.905B	1.0U	1.0U	2.0U	1.17U	0.0962U	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	0.550B	1.66B	66.7	8.35B	2670	--	--
30-Dec-04		7.0									0.0952U													
03-Jan-05		7.0									0.0952U													
10-Jan-05		7.0									0.114B													
18-Jan-05	10,800 B	7.0	--	--	0.120	0.923B	--	--	--	2.65U	0.0595JB	9.52U	5.0U	0.5U	--	--	--	0.454B	--	--	--	--	--	--
25-Jan-05		7.0									0.049J													
02-Feb-05		7.0									0.074J													
08-Feb-05		7.0									0.039J													
15-Feb-05		7.0									0.051J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
28-Feb-05	--	7.0	--	--	0.096U	0.67B	--	--	--	0.43U	0.035J	4.7U	0.94U	0.5U	--	--	--	14	--	--	--	--	--	--
08-Mar-05	--	7.0	--	--	--	--	--	--	--	--	0.033J	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Mar-05		7.0									0.11U													
22-Mar-05	3,500	7.0	5.0U	22	0.094U	0.37B	1.0U	1.0U	2.0U	1.4U	0.11U	4.7U	0.93	0.5U	1.0U	1.0U	1.0U	1.0U	7.4B	44	50U	2,400	ND	ND
30-Mar-05		7.0									0.11U													
05-Apr-05		7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--
06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06		7.0	--	--	0.098U	0.81B	--	--	--	--	0.11U	4.9U	0.97U	--	--	--	--	--	--	--	--	--	--	--
25-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
01-Feb-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
07-Feb-06	--	7.0	--	--	0.097U	0.67B	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
15-Mar-06	*NR	7.0	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR
23-Mar-06	*NR	7.0	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR

Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
-- = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit

RAC V TECHNICAL STATUS REPORT

April 1, 2006 to April 28, 2006

WORK ASSIGNMENT NUMBER:	201-RALR-05WE
SITE NAME:	Penta Wood Products-OU1, WI
ACTIVITY:	Long-Term Response Action
CH2M HILL JOB NUMBER:	184202
PREPARED BY:	Bill Andrae, Site Manager Mike Lehman, Assistant Site Manager
PERIOD ENDING:	April 28, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

An estimated 289,000 gallons of groundwater were treated and discharged during the reporting period. To date, a total of 44.67 million gallons (MG) of water have been treated. During the reporting period, the free product recovery system removed was off while the last granular activated carbon (GAC) vessel was relined. The total recovered volume since March 2004 is approximately 15,989 gallons.

On April 4, North Shore Environmental was onsite to load and transport an estimated 28,000 pounds (lbs) filter cake to the approved offsite disposal facility.

On April 7, the system was shut down due to high pressure on the lead GAC vessel. The spent carbon was removed on April 13. On April 17-19, the GAC vessel was sandblasted, repaired, and relined. After the required 1 week cure time, the GAC vessel was refilled on April 26 and filled with water on April 27. The system was restarted on May 1. This effort completes the relining of all the carbon vessels.

On April 11, the draft Annual Report was submitted to USEPA.

On April 10, Odorous Air Fan No. 1 was repaired. The ferric pump relay was also replaced.

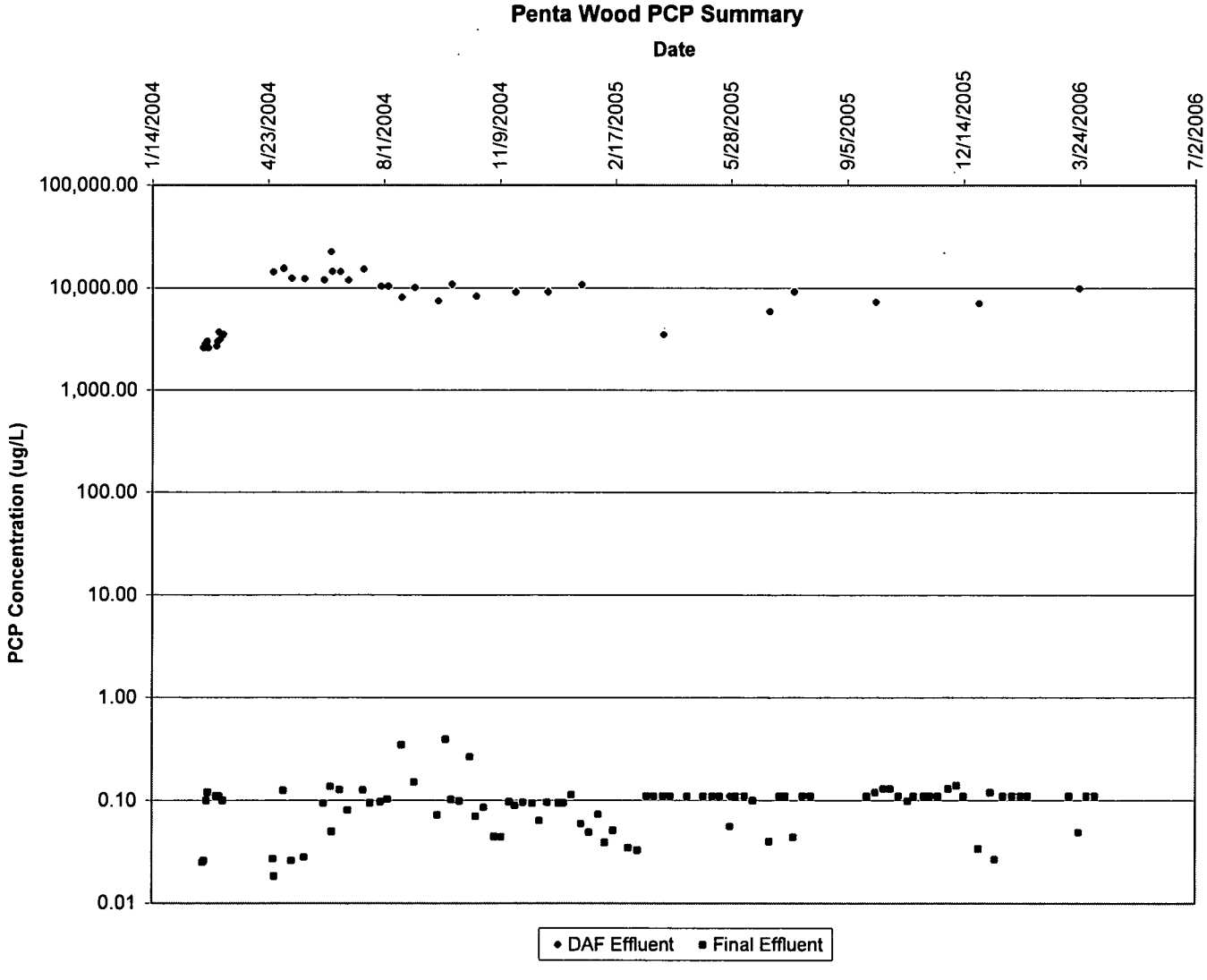
On April 20, the operation issue with Extraction Well No. 4 was identified as a power supply wiring fault rather than a variable frequency drive (VFD) issue. The wiring fault was located and repaired at the well vault.

The site was inspected during the spring breakup and no major erosion damage was identified. The planting of oats on bare spots as a cover crop for grasses was initiated.

Various system maintenance activities were conducted during the system shutdown.

The status of recommendations presented in the Remediation System Evaluation is summarized in a table located at the end of this document.

The results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling are summarized in the following chart. No exceedances of discharge criteria were detected during the reporting period. The table detailing the WPDES sampling results is presented at the end of the document.


Penta Wood PCP Summary
Date
1/14/2004
4/23/2004
8/1/2004
11/9/2004
2/17/2005
5/28/2005
9/5/2005
12/14/2005
3/24/2006
7/2/2006
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
PCP Concentration (ug/L)
DAF Effluent
Final Effluent

Summary of Project Status					
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete
1-PP	09/30/03	09/30/03	06/30/06		94
3-DU	09/30/03	09/30/03	06/30/06		99
4-PB	09/30/03	09/30/03	06/30/06		98
5-MS	09/30/03	09/30/03	03/30/04	03/30/04	100
6-RI	09/30/03	09/30/03	03/30/04	03/30/04	100
7-CV	09/30/03	09/30/03	06/30/06		88
8-AI	09/30/03	09/30/03	06/30/06		80
9-PJ	09/30/03	09/30/03	06/30/06		94
11-CO	05/01/06		06/30/06		0

2. Problems Resolved

The electrical problem with Extraction Well No. 4 was repaired. The issue was not with the VFD drive for the pump, but rather with the power supply wire to the junction box in the well vault. The wire was excavated and repaired and the pump resumed operation.

The last GAC vessel was relined during the week of April 17. Interior corrosion of the vessels will no longer continue. CH2M HILL will closely monitor carbon changeouts in order to prevent damage to the new interior epoxy lining.

3. Problem Areas and Recommended Solutions

None.

Change Order Status, Subcontract No. 308 Clearwater Technologies, Inc. Change Order submitted by CH2M HILL to USEPA (under WA #201)			
CO #1	Final actual quantity adjustment for the Equipment Installation, Option Period 2	$49,034	Approved

4. Deliverables Submitted

The draft annual report was submitted on April 11.

5. Activities Planned Next Reporting Period

CH2M HILL expects to conduct ongoing routine operations and maintenance (O&M) activities, including normal effluent sampling based on the substantive requirements of the WPDES permit.

The spring groundwater sampling event is scheduled for the week of May 29.

6. Key Personnel Changes

None.

7. Subcontractor Services

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company
Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Earthworks:	Darcy Brust Excavating
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	USFilter/Westates
Hazardous Waste Disposal:	North Shore Environmental
Tank Cleaning and Decontamination Services:	MidAmerica
Instrumentation and Controls:	System Technology Services, Inc.
Equipment Installation:	Clearwater Technologies, Inc.
Treatment System Chemicals:	Glacier Pure, Inc.
Backwash System:	Environmental Field Services, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells

8. Travel

None.

9. Laboratories

The 2005–2006 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. Project Performance

The treatment system modifications added in 2003–2004 have significantly improved the overall performance of the granular activated carbon system. The carbon beds are effectively adsorbing dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 micrograms per liter (µg/L).

REMEDIATION SYSTEM EVALUATION RECOMMENDATION STATUS

Recommendation	Status
Follow Water Quality Trends in Monitoring Wells to Determine if the Plume is Migrating	CH2M HILL will continue to evaluate the PCP data for MW-13 and the site to determine if plume migration is expanding and if additional monitoring sites may be needed. If continued increases are observed in MW-13, installation of a monitoring well to the east, in the direction of two residences, may be considered.
Provide More Accurate Prediction of Consumables and Disposal Costs	The budget for the new LTRA Work Plan will be more accurate because of the availability of actual costs.
Consider Modifying Management of GAC Units	CH2M HILL has requested preliminary cost information for the installation of backwash piping for the 10,000 pound units. The backwash pump installed in April 2005 is capable of supplying the necessary flow rate to backwash the larger GAC units.
Eliminate Redundant or Unnecessary Laboratory Analysis	Historical metals data were reviewed to verify elimination of total metals from the annual sampling of the monitoring wells and will not affect data evaluation. As instructed by USEPA, CH2M HILL will eliminate the total metals analysis from the groundwater sampling events. As instructed by USEPA, CH2M HILL will not eliminate the spring sampling event until sufficient data exists to fully understand the contaminant plume.
Savings From the Use of Dedicated Pumps in Monitoring Wells	CH2M HILL is reducing the field staff for 2006 spring sampling event and will evaluate the overall level of effort versus previous sampling events. CH2M HILL will also evaluate the potential for the plant operator to serve as a field team member to further reduce travel costs.
Investigate Possibility of Declassifying Waste	CH2M HILL investigated the possibility of declassifying the waste and determined that this action is not feasible due to the continued presence of LNAPL in the ground considered to be a listed hazardous waste.
Decrease Project Management/ Reporting Costs	CH2M HILL expects project management costs to decrease during the new LTRA work assignment. Data management costs may remain high due to the volume of analytical data generated for the site and the level of effort associated with meeting USEPA reporting requirements.
Develop Tracking of Routine and Non-Routine Costs	For the new LTRA work assignment, CH2M HILL will develop a tracking system to assist in analyzing routine and non-routine maintenance activities, the associated costs, and possible ways to reduce the costs.
Evaluate Potential to Reduce Ground Water Extraction without Substantially Affecting LNAPL Recovery	As part of the data evaluation activities for the new LTRA work assignment, CH2M HILL will continue to evaluate LNAPL recovery and dissolved plume containment to determine the potential for reduced groundwater pumping.
Adjust pH to 6.5 instead of 7.0	As instructed by USEPA, CH2M HILL has implemented this recommendation.
Transition From Ground Water Extraction and LNAPL Recovery System To Bioventing System and Intrinsic Remediation	As part of the new LTRA work assignment, CH2M HILL will review and reevaluate subsurface conditions and the potential impacts of operating the biovent system concurrently with the groundwater and LNAPL extraction systems and present a recommendation to USEPA for review and possible implementation.

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000 B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900 B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04		7.0									0.265B													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													
04-Nov-04		7.0									0.0447J													
10-Nov-04		7.0									0.0442J													
17-Nov-04		7.0									0.0971U													
22-Nov-04	9,140	7.0	--	--	0.0935U	0.787JB	--	--	--	0.82U	0.0900J	9.43U	1.0U	0.5U	--	--	--	0.727B	--	--	--	--	--	--
29-Nov-04		7.0									0.0962U													
07-Dec-04		7.0									0.0943U													
13-Dec-04		7.0									0.0637J													
20-Dec-04	9,100	7.0	4.0U	27	0.0962U	0.905B	1.0U	1.0U	2.0U	1.17U	0.0962U	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	0.550B	1.66B	66.7	8.35B	2670	--	--
30-Dec-04		7.0									0.0952U													
03-Jan-05		7.0									0.0952U													
10-Jan-05		7.0									0.114B													
18-Jan-05	10,800 B	7.0	--	--	0.120	0.923B	--	--	--	2.65U	0.0595JB	9.52U	5.0U	0.5U	--	--	--	0.454B	--	--	--	--	--	--
25-Jan-05		7.0									0.049J													
02-Feb-05		7.0									0.074J													
08-Feb-05		7.0									0.039J													
15-Feb-05		7.0									0.051J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
28-Feb-05	--	7.0	--	--	0.096U	0.67B	--	--	--	0.43U	0.035J	4.7U	0.94U	0.5U	--	--	--	14	--	--	--	--	--	--
08-Mar-05	--	7.0	--	--	--	--	--	--	--	--	0.033J	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Mar-05		7.0									0.11U													
22-Mar-05	3,500	7.0	5.0U	22	0.094U	0.37B	1.0U	1.0U	2.0U	1.4U	0.11U	4.7U	0.93	0.5U	1.0U	1.0U	1.0U	1.0U	7.4B	44	50U	2,400	ND	ND
30-Mar-05		7.0									0.11U													
05-Apr-05		7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--
06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06		7.0	--	--	0.098U	0.81B	--	--	--	--	0.11U	4.9U	0.97U	--	--	--	--	--	--	--	--	--	--	--
25-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
01-Feb-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
07-Feb-06	--	7.0	--	--	0.097U	0.67B	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
15-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
23-Mar-06	9,900	6.5	5.0U	23	0.035J	0.68B	1.0U	1.0U	1.0U	0.32U	0.049J	4.7U	0.93U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	34	50U	2,300	ND	ND
30-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
06-Apr-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--

Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
-- = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit

RAC V TECHNICAL STATUS REPORT

April 29, 2006 to May 26, 2006

WORK ASSIGNMENT NUMBER:	201-RALR-05WE
SITE NAME:	Penta Wood Products-OU1, WI
ACTIVITY:	Long-Term Response Action
CH2M HILL JOB NUMBER:	184202
PREPARED BY:	Bill Andrae, Site Manager Mike Lehman, Assistant Site Manager
PERIOD ENDING:	May 26, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

An estimated 289,000 gallons of groundwater were treated and discharged during the reporting period. To date, a total of 44.67 million gallons (MG) of water have been treated. The total recovered volume of light nonaqueous phase liquid (LNAPL) since March 2004 is approximately 15,989 gallons.

As mentioned in last month's report, the relining of the last carbon vessel was completed and the system was restarted on May 1.

On May 12, North Shore Environmental was onsite to load and transport an estimated 20,800 of carbon and debris to the approved offsite disposal facility.

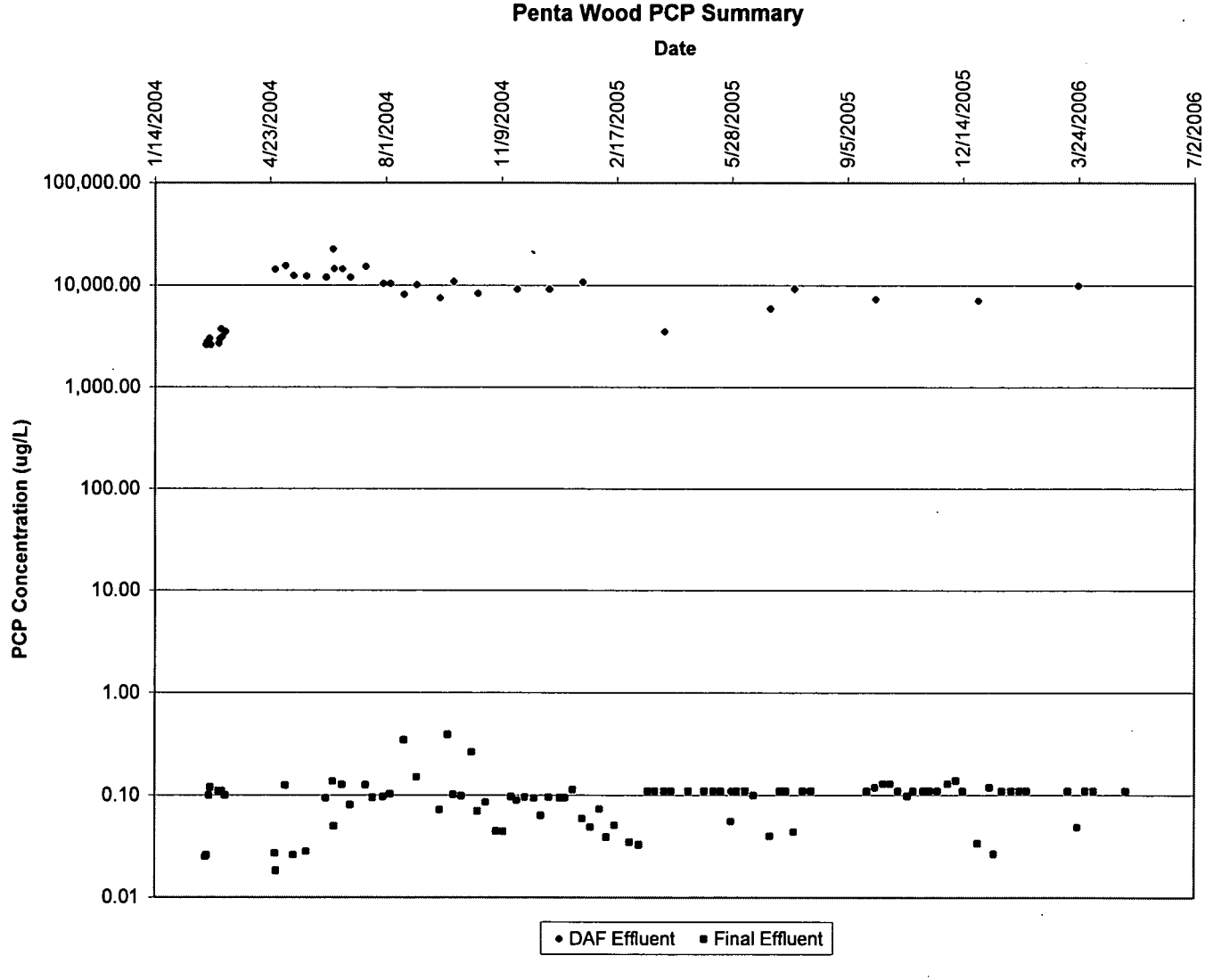
On May 22, the system was shut down in preparation for changeout of the carbon in one vessel. The changeout was conducted on May 24.

On May 24, a computer virus rendered the site computer unusable. The computer was sent to CH2M HILL's office in Milwaukee, Wisconsin for repair. The computer's hard drive was repaired and system software reinstalled and then sent back to the site.

The site was inspected and no major erosion damage was identified. The planting of oats on bare spots as a cover crop for grasses was continued.

The status of recommendations presented in the Remediation System Evaluation is summarized in a table located at the end of this document.

The results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling are summarized in the following chart.


Penta Wood PCP Summary
Date
1/14/2004
4/23/2004
8/1/2004
11/9/2004
2/17/2005
5/28/2005
9/5/2005
12/14/2005
3/24/2006
7/2/2006
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
PCP Concentration (ug/L)
DAF Effluent
Final Effluent

No exceedances of discharge criteria were detected during the reporting period. The table detailing the WPDES sampling results is presented at the end of the document.

Summary of Project Status					
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete
1-PP	09/30/03	09/30/03	06/30/06		97
3-DU	09/30/03	09/30/03	06/30/06	05/26/06	100
4-PB	09/30/03	09/30/03	06/30/06	05/26/06	100
5-MS	09/30/03	09/30/03	03/30/04	03/30/04	100
6-RI	09/30/03	09/30/03	03/30/04	03/30/04	100
7-CV	09/30/03	09/30/03	06/30/06		88
8-AI	09/30/03	09/30/03	06/30/06		80
9-PJ	09/30/03	09/30/03	06/30/06		97
11-CO	05/01/06		06/30/06		0

2. Problems Resolved

None.

3. Problem Areas and Recommended Solutions

None.

Change Order Status, Subcontract No. 308 Clearwater Technologies, Inc. Change Order submitted by CH2M HILL to USEPA (under WA #201)			
CO #1	Final actual quantity adjustment for the Equipment Installation, Option Period 2	$49,034	Approved

4. Deliverables Submitted

None.

5. Activities Planned Next Reporting Period

CH2M HILL expects to conduct ongoing routine operations and maintenance (O&M) activities, including normal effluent sampling based on the substantive requirements of the WPDES permit.

The spring groundwater sampling event is scheduled for the week of May 29.

6. Key Personnel Changes

None.

7. Subcontractor Services

Electrical Service: Northwestern WI Electric Co.

Telephone: Siren Telephone Company

Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Earthworks:	Darcy Brust Excavating
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	USFilter/Westates
Hazardous Waste Disposal:	North Shore Environmental
Tank Cleaning and Decontamination Services:	MidAmerica
Instrumentation and Controls:	System Technology Services, Inc.
Equipment Installation:	Clearwater Technologies, Inc.
Treatment System Chemicals:	Glacier Pure, Inc.
Backwash System:	Environmental Field Services, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells

8. **Travel**

None.

9. **Laboratories**

The 2005–2006 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. **Project Performance**

The treatment system modifications added in 2003–2004 have significantly improved the overall performance of the granular activated carbon system. The carbon beds are effectively adsorbing dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 micrograms per liter (µg/L).

REMEDIATION SYSTEM EVALUATION RECOMMENDATION STATUS

Recommendation	Status
Follow Water Quality Trends in Monitoring Wells to Determine if the Plume is Migrating	CH2M HILL will continue to evaluate the PCP data for MW-13 and the site to determine if plume migration is expanding and if additional monitoring sites may be needed. If continued increases are observed in MW-13, installation of a monitoring well to the east, in the direction of two residences, may be considered.
Provide More Accurate Prediction of Consumables and Disposal Costs	The budget for the new LTRA Work Plan will be more accurate because of the availability of actual costs.
Consider Modifying Management of GAC Units	CH2M HILL has requested preliminary cost information for the installation of backwash piping for the 10,000 pound units. The backwash pump installed in April 2005 is capable of supplying the necessary flow rate to backwash the larger GAC units.
Eliminate Redundant or Unnecessary Laboratory Analysis	Historical metals data were reviewed to verify elimination of total metals from the annual sampling of the monitoring wells and will not affect data evaluation. As instructed by USEPA, CH2M HILL will eliminate the total metals analysis from the groundwater sampling events. As instructed by USEPA, CH2M HILL will not eliminate the spring sampling event until sufficient data exists to fully understand the contaminant plume.
Savings From the Use of Dedicated Pumps in Monitoring Wells	CH2M HILL is reducing the field staff for the 2006 spring sampling event and will evaluate the overall level of effort versus previous sampling events. CH2M HILL will also evaluate the potential for the plant operator to serve as a field team member to further reduce travel costs.
Investigate Possibility of Declassifying Waste	CH2M HILL investigated the possibility of declassifying the waste and determined that this action is not feasible due to the continued presence of LNAPL in the ground considered to be a listed hazardous waste.
Decrease Project Management/ Reporting Costs	CH2M HILL expects project management costs to decrease during the new LTRA work assignment. Data management costs may remain high due to the volume of analytical data generated for the site and the level of effort associated with meeting USEPA reporting requirements.
Develop Tracking of Routine and Non-Routine Costs	For the new LTRA work assignment, CH2M HILL will develop a tracking system to assist in analyzing routine and non-routine maintenance activities, the associated costs, and possible ways to reduce the costs.
Evaluate Potential to Reduce Ground Water Extraction without Substantially Affecting LNAPL Recovery	As part of the data evaluation activities for the new LTRA work assignment, CH2M HILL will continue to evaluate LNAPL recovery and dissolved plume containment to determine the potential for reduced groundwater pumping.
Adjust pH to 6.5 instead of 7.0	As instructed by USEPA, CH2M HILL has implemented this recommendation.
Transition From Ground Water Extraction and LNAPL Recovery System To Bioventing System and Intrinsic Remediation	As part of the new LTRA work assignment, CH2M HILL will review and reevaluate subsurface conditions and the potential impacts of operating the biovent system concurrently with the groundwater and LNAPL extraction systems and present a recommendation to USEPA for review and possible implementation.

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000 B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900 B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04		7.0									0.265B													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													
04-Nov-04		7.0									0.0447J													
10-Nov-04		7.0									0.0442J													
17-Nov-04		7.0									0.0971U													
22-Nov-04	9,140	7.0	--	--	0.0935U	0.787JB	--	--	--	0.82U	0.0900J	9.43U	1.0U	0.5U	--	--	--	0.727B	--	--	--	--	--	--
29-Nov-04		7.0									0.0962U													
07-Dec-04		7.0									0.0943U													
13-Dec-04		7.0									0.0637J													
20-Dec-04	9,100	7.0	4.0U	27	0.0962U	0.905B	1.0U	1.0U	2.0U	1.17U	0.0962U	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	0.550B	1.66B	66.7	8.35B	2670	--	--
30-Dec-04		7.0									0.0952U													
03-Jan-05		7.0									0.0952U													
10-Jan-05		7.0									0.114B													
18-Jan-05	10,800 B	7.0	--	--	0.120	0.923B	--	--	--	2.65U	0.0595JB	9.52U	5.0U	0.5U	--	--	--	0.454B	--	--	--	--	--	--
25-Jan-05		7.0									0.049J													
02-Feb-05		7.0									0.074J													
08-Feb-05		7.0									0.039J													
15-Feb-05		7.0									0.051J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
28-Feb-05	--	7.0	--	--	0.096U	0.67B	--	--	--	0.43U	0.035J	4.7U	0.94U	0.5U	--	--	--	14	--	--	--	--	--	--
08-Mar-05	--	7.0	--	--	--	--	--	--	--	--	0.033J	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Mar-05		7.0									0.11U													
22-Mar-05	3,500	7.0	5.0U	22	0.094U	0.37B	1.0U	1.0U	2.0U	1.4U	0.11U	4.7U	0.93	0.5U	1.0U	1.0U	1.0U	1.0U	7.4B	44	50U	2,400	ND	ND
30-Mar-05		7.0									0.11U													
05-Apr-05	.	7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--
06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06		7.0	--	--	0.098U	0.81B	--	--	--	--	0.11U	4.9U	0.97U	--	--	--	--	--	--	--	--	--	--	--
25-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

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01-Feb-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
07-Feb-06	--	7.0	--	--	0.097U	0.67B	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
15-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
23-Mar-06	9,900	6.5	5.0U	23	0.035J	0.68B	1.0U	1.0U	1.0U	0.32U	0.049J	4.7U	0.93U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	34	50U	2,300	ND	ND
30-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
06-Apr-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
04-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
11-May-06	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR
18-May-06	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR

Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
-- = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit

RAC V TECHNICAL STATUS REPORT

May 27, 2006 to June 30, 2006

WORK ASSIGNMENT NUMBER:	201-RALR-05WE
SITE NAME:	Penta Wood Products-OU1, WI
ACTIVITY:	Long-Term Response Action
CH2M HILL JOB NUMBER:	184202
PREPARED BY:	Bill Andrae/MKE, Site Manager Mike Lehman/MKE, Assistant Site Manager
PERIOD ENDING:	June 30, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

An estimated 1.66 million gallons (MG) of groundwater were treated and discharged during the reporting period. To date, a total of 46.33 MG of water have been treated. An estimated 1,816 gallons of light nonaqueous phase liquid (LNAPL) were recovered bringing the total recovered volume of LNAPL since March 2004 to approximately 17,805 gallons.

The semi-annual groundwater sampling event was conducted May 30 through June 2. An equipment malfunction with the control box for the sample pumps resulted in an additional trip to the site for one CH2M HILL staff member to complete the sampling on June 7 and 8.

On June 9, the relay for the ferric sulfate pump in the programmable logic controller (PLC) cabinet was replaced.

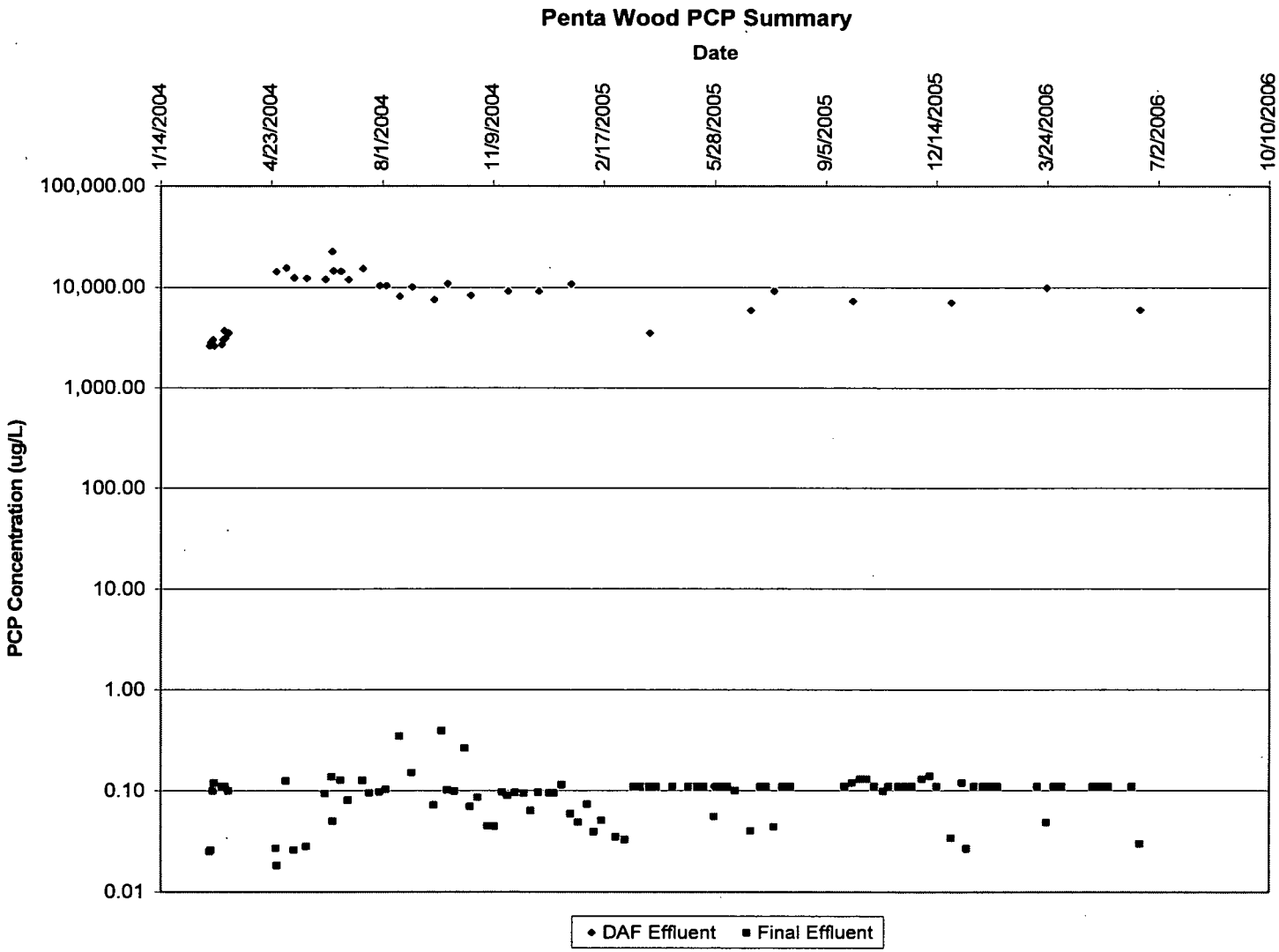
On June 20, North Shore Environmental was onsite to load and transport an estimated 28,000 pounds of filter cake, 20,055 of carbon and debris, and 4,000 gallons of oil/water mixture to the approved offsite disposal facility.

On June 28–29, the site manager met with the WAM at the site to review the treatment system operation, inspect the site, and discuss operational costs.

On June 30, the system was shut down due to high pressure and the holiday weekend.

The status of recommendations presented in the Remediation System Evaluation is summarized in a table located at the end of this document.

The results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling are summarized in the following chart.


Penta Wood PCP Summary
Date
1/14/2004
4/23/2004
8/1/2004
11/9/2004
2/17/2005
5/28/2005
9/5/2005
12/14/2005
3/24/2006
7/2/2006
10/10/2006
PCP Concentration (ug/L)
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
DAF Effluent
Final Effluent

No exceedances of discharge criteria were detected during the reporting period. The table detailing the WPDES sampling results is presented at the end of the document.

Summary of Project Status					
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete
1-PP	09/30/03	09/30/03	06/30/06		99
3-DU	09/30/03	09/30/03	06/30/06	05/26/06	100
4-PB	09/30/03	09/30/03	06/30/06	05/26/06	100
5-MS	09/30/03	09/30/03	03/30/04	03/30/04	100
6-RI	09/30/03	09/30/03	03/30/04	03/30/04	100
7-CV	09/30/03	09/30/03	06/30/06		95
8-AI	09/30/03	09/30/03	06/30/06		80
9-PJ	09/30/03	09/30/03	06/30/06		99
11-CO	05/01/06		06/30/06		0

2. Problems Resolved

None.

3. Problem Areas and Recommended Solutions

None.

Change Order Status, Subcontract No. 308 Clearwater Technologies, Inc. Change Order submitted by CH2M HILL to USEPA (under WA #201)			
CO #1	Final actual quantity adjustment for the Equipment Installation, Option Period 2	$49,034	Approved

4. Deliverables Submitted

None.

5. Activities Planned Next Reporting Period

CH2M HILL expects to conduct ongoing routine operations and maintenance (O&M) activities, including normal effluent sampling based on the substantive requirements of the WPDES permit.

CH2M HILL plans to close out the work assignment.

6. Key Personnel Changes

None.

7. Subcontractor Services

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company

Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Earthworks:	Darcy Brust Excavating
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	USFilter/Westates
Hazardous Waste Disposal:	North Shore Environmental
Tank Cleaning and Decontamination Services:	MidAmerica
Instrumentation and Controls:	System Technology Services, Inc.
Equipment Installation:	Clearwater Technologies, Inc.
Treatment System Chemicals:	Glacier Pure, Inc.
Backwash System:	Environmental Field Services, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells

8. **Travel**

Jon Tortomasi was onsite from May 30–June 2, and Dave Shekoski was onsite from May 30–June 2 and June 7–8 to conduct the semi-annual groundwater sampling event. Travel charges for Jon Tortomasi will be invoiced during the next reporting period.

Bill Andrae traveled to the site on June 28–29 to meet with the WAM site to review the treatment system operation, inspect the site, and discuss operational costs. Travel charges will be invoiced during the next reporting period.

9. **Laboratories**

The 2005–2006 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. **Project Performance**

The treatment system modifications added in 2003–2004 have significantly improved the overall performance of the granular activated carbon system. The carbon beds are effectively adsorbing dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 micrograms per liter (µg/L).

REMEDIATION SYSTEM EVALUATION RECOMMENDATION STATUS

Recommendation	Status
Follow Water Quality Trends in Monitoring Wells to Determine if the Plume is Migrating	CH2M HILL will continue to evaluate the PCP data for MW-13 and the site to determine if plume migration is expanding and if additional monitoring sites may be needed. If continued increases are observed in MW-13, installation of a monitoring well to the east, in the direction of two residences, may be considered.
Provide More Accurate Prediction of Consumables and Disposal Costs	The budget for the new LTRA Work Plan will be more accurate because of the availability of actual costs.
Consider Modifying Management of GAC Units	CH2M HILL has requested preliminary cost information for the installation of backwash piping for the 10,000 pound units. The backwash pump installed in April 2005 is capable of supplying the necessary flow rate to backwash the larger GAC units.
Eliminate Redundant or Unnecessary Laboratory Analysis	Historical metals data were reviewed to verify elimination of total metals from the annual sampling of the monitoring wells and will not affect data evaluation. As instructed by USEPA, CH2M HILL will eliminate the total metals analysis from the groundwater sampling events. As instructed by USEPA, CH2M HILL will not eliminate the spring sampling event until sufficient data exists in order to fully evaluate the contaminant plume.
Savings From the Use of Dedicated Pumps in Monitoring Wells	CH2M HILL is reducing the field staff for the 2006 spring sampling event and will evaluate the overall level of effort versus previous sampling events. CH2M HILL will also evaluate the potential for the plant operator to serve as a field team member to further reduce travel costs.
Investigate Possibility of Declassifying Waste	CH2M HILL investigated the possibility of declassifying the waste and determined that this action is not feasible due to the continued presence of LNAPL in the ground considered to be a listed hazardous waste.
Decrease Project Management/ Reporting Costs	CH2M HILL expects project management costs to decrease during the new LTRA work assignment. Data management costs may remain high due to the volume of analytical data generated for the site and the level of effort associated with meeting USEPA reporting requirements.
Develop Tracking of Routine and Non-Routine Costs	For the new LTRA work assignment, CH2M HILL will develop a tracking system to assist in analyzing routine and non-routine maintenance activities, the associated costs, and possible ways to reduce the costs.
Evaluate Potential to Reduce Ground Water Extraction without Substantially Affecting LNAPL Recovery	As part of the data evaluation activities for the new LTRA work assignment, CH2M HILL will continue to evaluate LNAPL recovery and dissolved plume containment to determine the potential for reduced groundwater pumping.
Adjust pH to 6.5 instead of 7.0	As instructed by USEPA, CH2M HILL has implemented this recommendation.
Transition From Ground Water Extraction and LNAPL Recovery System To Bioventing System and Intrinsic Remediation	As part of the new LTRA work assignment, CH2M HILL will review and reevaluate subsurface conditions and the potential impacts of operating the biovent system concurrently with the groundwater and LNAPL extraction systems and present a recommendation to USEPA for review and possible implementation.

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04		7.0									0.265B													
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
04-Nov-04		7.0									0.0447J													
10-Nov-04		7.0									0.0442J													
17-Nov-04		7.0									0.0971U													
22-Nov-04	9,140	7.0	--	--	0.0935U	0.787JB	--	--	--	0.82U	0.0900J	9.43U	1.0U	0.5U	--	--	--	0.727B	--	--	--	--	--	--
29-Nov-04		7.0									0.0962U													
07-Dec-04		7.0									0.0943U													
13-Dec-04		7.0									0.0637J													
20-Dec-04	9,100	7.0	4.0U	27	0.0962U	0.905B	1.0U	1.0U	2.0U	1.17U	0.0962U	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	0.550B	1.66B	66.7	8.35B	2670	--	--
30-Dec-04		7.0									0.0952U													
03-Jan-05		7.0									0.0952U													
10-Jan-05		7.0									0.114B													
18-Jan-05	10,800B	7.0	--	--	0.120	0.923B	--	--	--	2.65U	0.0595JB	9.52U	5.0U	0.5U	--	--	--	0.454B	--	--	--	--	--	--
25-Jan-05		7.0									0.049J													
02-Feb-05		7.0									0.074J													
08-Feb-05		7.0									0.039J													
15-Feb-05		7.0									0.051J													
28-Feb-05	--	7.0	--	--	0.096U	0.67B	--	--	--	0.43U	0.035J	4.7U	0.94U	0.5U	--	--	--	14	--	--	--	--	--	--
08-Mar-05	--	7.0	--	--	--	--	--	--	--	--	0.033J	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Mar-05		7.0									0.11U													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
22-Mar-05	3,500	7.0	5.0U	22	0.094U	0.37B	1.0U	1.0U	2.0U	1.4U	0.11U	4.7U	0.93	0.5U	1.0U	1.0U	1.0U	1.0U	7.4B	44	50U	2,400	ND	ND
30-Mar-05		7.0									0.11U													
05-Apr-05		7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--

WPDES SAMPLING SUMMARY

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06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06		7.0	--	--	0.098U	0.81B	--	--	--	--	0.11U	4.9U	0.97U	--	--	--	--	--	--	--	--	--	--	--
25-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Feb-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
07-Feb-06	--	7.0	--	--	0.097U	0.67B	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
15-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

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23-Mar-06	9,900	6.5	5.0U	23	0.035J	0.68B	1.0U	1.0U	1.0U	0.32U	0.049J	4.7U	0.93U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	34	50U	2,300	ND	ND
30-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
06-Apr-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
04-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
11-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.8U	0.95U	--	--	--	--	--	--	--	--	--	--	--
08-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-06	6,000	6.5	5.0U	25	0.093U	0.43B	1.0U	1.0U	1.0U	0.87U	0.03J	4.8U	0.88J	0.50U	5.0U	5.0U	5.0U	3.0	4.3B	52	130	2,300	--	--
21-Jun-06	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR

Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
-- = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit

RAC2 TECHNICAL STATUS REPORT

April 11, 2006 to June 30, 2006

WORK ASSIGNMENT NUMBER: 004-LRLR-05WE

SITE NAME: Penta Wood Products-OU1, WI

ACTIVITY: Long-Term Response Action

CH2M HILL JOB NUMBER: 344511

PREPARED BY: Bill Andrae, Site Manager

PERIOD ENDING: June 30, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

On April 11, CH2M HILL received the work assignment form and statement of work for this work assignment.

On April 27, CH2M HILL participated in a kick-off conference call with USEPA to discuss the work assignment statement of work.

On May 23, CH2M HILL submitted the draft work plan.

CH2M HILL initiated preliminary work on the procurement of key subcontracts.

Summary of Project Status					
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete
A (PP)	07/01/06		03/14/11		
B (PJ)	07/01/06		03/14/11		
C (CV)	07/01/06		03/14/11		
D (PC)	07/01/06		03/14/11		
E (CO)	03/01/11		03/14/11		

2. Problems Resolved

None.

3. Problem Areas and Recommended Solutions

None.

4. **Deliverables Submitted**

   On May 23, CH2M HILL submitted the draft work plan.

5. **Activities Planned Next Reporting Period**

   CH2M HILL is awaiting USEPA approval of the draft work plan.

6. **Key Personnel Changes**

   None.

7. **Subcontractor Services**

   None.

8. **Travel**

   None.

9. **Laboratories**

   None.

10. **Project Performance**

    CH2M HILL quickly assembled a project team to deliver the work plan in a timely manner and submitted the draft work plan on May 23 (to arrive on May 24), 1 day ahead of the scheduled due date of May 25.

RAC V TECHNICAL STATUS REPORT

July 1, 2006 to July 28, 2006

WORK ASSIGNMENT NUMBER:	201-RALR-05WE
SITE NAME:	Penta Wood Products-OU1, WI
ACTIVITY:	Long-Term Response Action
CH2M HILL JOB NUMBER:	184202
PREPARED BY:	Bill Andrae/MKE, Site Manager Mike Lehman/MKE, Assistant Site Manager
PERIOD ENDING:	July 28, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

An estimated 1.38 million gallons (MG) of groundwater were treated and discharged during the reporting period. To date, a total of 47.71 MG of water have been treated. An estimated 51 gallons of light nonaqueous phase liquid (LNAPL) were recovered bringing the total recovered volume of LNAPL since March 2004 to approximately 17,856 gallons.

On July 1, the system was shut down to prepare for a carbon changeout. On July 5, USFilter was onsite to perform the carbon changeout on the small carbon vessel and one large carbon vessel. The system was restarted on July 10.

High turbidity in the dissolved air flotation (DAF) effluent was observed during the week of July 19. The operator was advised to increase the pH setpoint for the ferric sulfate addition from 5.7 to 5.9. The operator reported that the high turbidity issue disappeared. The operator will continue to adjust this setpoint and the polymer dosage to minimize the turbidity in the DAF effluent.

During the reporting period, the treatment system experienced electrical service interruptions, brownouts, and power surges most likely related to the high electrical demand resulting from high temperatures. With predictions of temperatures in the high 90s to low 100s, the system was shut down for the weekend on July 28. The system will be restarted on July 31.

The status of recommendations presented in the Remediation System Evaluation is summarized in a table located at the end of this document.

The results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling are summarized in the following chart.

Standard Form 1035 PUBLIC VOUCHER FOR PURCHASES AND SERVICES OTHER THAN PERSONAL

Voucher No. 180
Sheet No. 4

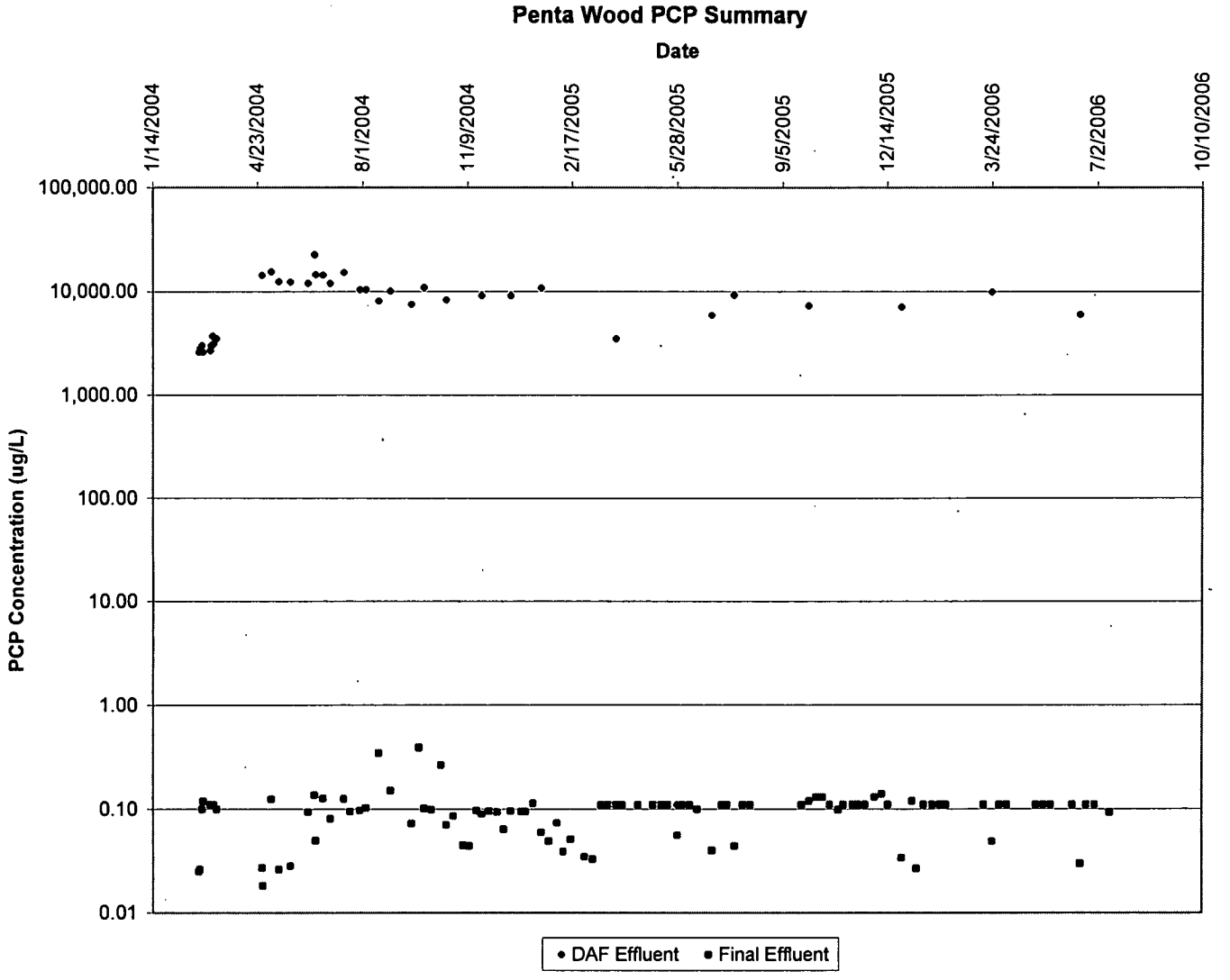
U.S. ENVIRONMENTAL PROTECTION AGENCY
RTP-FINANCIAL MANAGEMENT CENTER
MAIL CODE-D143-02
RESEARCH TRIANGLE PARK, NC 27711

Contract No.68-W6-0025
CH2M HILL, INC.
1300 S.W. 5th Ave.
Portland, OR 97201

CURRENT AND CUMULATIVE COSTS, BASE FEE AND PERFORMANCE FEE
Term Form
Penta Wood Products, WI
Work Assignment 201-RALR-05WE
For the month of JULY, 2006 Period: OPTION2

Major Cost Element	Hours Current	Hours Cumulative	Amount Claimed Current	Amount Claimed Cumulative
LOE	209.60	16,896.30	3,911.81	448,023.60
Clerical	22.10	1,835.90	435.95	33,671.72
1. HOURS/RAW LABOR	231.70	18,732.20	4,347.76	481,695.32
2. FRINGE BENEFITS			646.01	146,715.05
3. OVERHEAD			5,166.48	296,168.47
4. GENERAL AND ADMINISTRATIVE			1,070.53	219,070.61
5. SUBTOTAL LABOR			11,230.78	1,143,649.45
6. OTHER DIRECT COSTS			389.90	101,555.11
7. COMPUTER			109.93	53,147.46
8. TRAVEL			785.70	72,016.25
9. EQUIPMENT			1,937.74	47,570.73
10. SUBTOTAL			3,223.27	274,289.55
11. TEAM SUBCONTRACTS AND SUBCONTRACT POOL SUBCONTRACT POOL			130,311.20	2,509,723.61
12. SUBTOTAL SUBCONTRACTS			130,311.20	2,509,723.61
13. TOTAL COSTS			144,765.25	3,927,662.61
14. BASE FEE			3,417.33	111,500.42
15. PERFORMANCE (AWARD) FEE			0.00	0.00
16. FIXED PRICE			0.00	0.00
17. TOTAL VOUCHER LESS PLI			148,182.58	4,039,163.03
18. POLLUTION LIABILITY INSURANCE			0.00	0.00
19. LABORATORY SERVICES			0.00	0.00
20. AMOUNT CLAIMED THIS VOUCHER			148,182.58	4,039,163.03
21. LESS PRIOR PAYMENTS				3,890,980.45
22. TOTAL AMOUNT DUE				148,182.58

>>> THIS VOUCHER CONTAINS CONFIDENTIAL BUSINESS INFORMATION <<<
(184202)


Penta Wood PCP Summary
Date
1/14/2004
4/23/2004
8/1/2004
11/9/2004
2/17/2005
5/28/2005
9/5/2005
12/14/2005
3/24/2006
7/2/2006
10/10/2006
PCP Concentration (ug/L)
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
DAF Effluent
Final Effluent

No exceedances of discharge criteria were detected during the reporting period. The table detailing the WPDES sampling results is presented at the end of the document.

Summary of Project Status					
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete
1-PP	09/30/03	09/30/03	07/28/06	07/28/06	100
3-DU	09/30/03	09/30/03	07/28/06	05/26/06	100
4-PB	09/30/03	09/30/03	07/28/06	05/26/06	100
5-MS	09/30/03	09/30/03	03/30/04	03/30/04	100
6-RI	09/30/03	09/30/03	03/30/04	03/30/04	100
7-CV	09/30/03	09/30/03	07/28/06	07/28/06	100
8-AI	09/30/03	09/30/03	07/28/06	07/28/06	100
9-PJ	09/30/03	09/30/03	07/28/06	07/28/06	100
11-CO	05/01/06		07/28/06		0

2. Problems Resolved

None.

3. Problem Areas and Recommended Solutions

None.

Change Order Status, Subcontract No. 308 Clearwater Technologies, Inc. Change Order submitted by CH2M HILL to USEPA (under WA #201)			
CO #1	Final actual quantity adjustment for the Equipment Installation, Option Period 2	$49,034	Approved

4. Deliverables Submitted

None.

5. Activities Planned Next Reporting Period

CH2M HILL expects to conduct ongoing routine operations and maintenance (O&M) activities, including normal effluent sampling based on the substantive requirements of the WPDES permit.

Operation of the system will be switched over to the new work assignment and new contract.

CH2M HILL plans to close out the work assignment.

6. Key Personnel Changes

None.

7. Subcontractor Services

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company
Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Earthworks:	Darcy Brust Excavating
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	USFilter/Westates
Hazardous Waste Disposal:	North Shore Environmental
Tank Cleaning and Decontamination Services:	MidAmerica
Instrumentation and Controls:	System Technology Services, Inc.
Equipment Installation:	Clearwater Technologies, Inc.
Treatment System Chemicals:	Glacier Pure, Inc.
Backwash System:	Environmental Field Services, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells

8. Travel

Travel for Jon Tortomasi and Bill Andrae was reported in last month's Technical Status Report.

9. Laboratories

The 2005-2006 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. Project Performance

The treatment system modifications added in 2003-2004 have significantly improved the overall performance of the granular activated carbon system. The carbon beds are effectively adsorbing dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 micrograms per liter (µg/L).

REMEDIATION SYSTEM EVALUATION RECOMMENDATION STATUS

Recommendation	Status
Follow Water Quality Trends in Monitoring Wells to Determine if the Plume is Migrating	CH2M HILL will continue to evaluate the PCP data for MW-13 and the site to determine if plume migration is expanding and if additional monitoring sites may be needed. If continued increases are observed in MW-13, installation of a monitoring well to the east, in the direction of two residences, may be considered.
Provide More Accurate Prediction of Consumables and Disposal Costs	The budget for the new LTRA Work Plan will be more accurate because of the availability of actual costs.
Consider Modifying Management of GAC Units	CH2M HILL has requested preliminary cost information for the installation of backwash piping for the 10,000 pound units. The backwash pump installed in April 2005 is capable of supplying the necessary flow rate to backwash the larger GAC units.
Eliminate Redundant or Unnecessary Laboratory Analysis	Historical metals data were reviewed to verify elimination of total metals from the annual sampling of the monitoring wells and will not affect data evaluation. As instructed by USEPA, CH2M HILL will eliminate the total metals analysis from the groundwater sampling events. As instructed by USEPA, CH2M HILL will not eliminate the spring sampling event until sufficient data exists in order to fully evaluate the contaminant plume.
Savings From the Use of Dedicated Pumps in Monitoring Wells	CH2M HILL is reducing the field staff for the 2006 spring sampling event and will evaluate the overall level of effort versus previous sampling events. CH2M HILL will also evaluate the potential for the plant operator to serve as a field team member to further reduce travel costs.
Investigate Possibility of Declassifying Waste	CH2M HILL investigated the possibility of declassifying the waste and determined that this action is not feasible due to the continued presence of LNAPL in the ground considered to be a listed hazardous waste.
Decrease Project Management/ Reporting Costs	CH2M HILL expects project management costs to decrease during the new LTRA work assignment. Data management costs may remain high due to the volume of analytical data generated for the site and the level of effort associated with meeting USEPA reporting requirements.
Develop Tracking of Routine and Non-Routine Costs	For the new LTRA work assignment, CH2M HILL will develop a tracking system to assist in analyzing routine and non-routine maintenance activities, the associated costs, and possible ways to reduce the costs.
Evaluate Potential to Reduce Ground Water Extraction without Substantially Affecting LNAPL Recovery	As part of the data evaluation activities for the new LTRA work assignment, CH2M HILL will continue to evaluate LNAPL recovery and dissolved plume containment to determine the potential for reduced groundwater pumping.
Adjust pH to 6.5 instead of 7.0	As instructed by USEPA, CH2M HILL has implemented this recommendation.
Transition From Ground Water Extraction and LNAPL Recovery System To Bioventing System and Intrinsic Remediation	As part of the new LTRA work assignment, CH2M HILL will review and reevaluate subsurface conditions and the potential impacts of operating the biovent system concurrently with the groundwater and LNAPL extraction systems and present a recommendation to USEPA for review and possible implementation.

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04		7.0									0.265B													
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
04-Nov-04		7.0									0.0447J													
10-Nov-04		7.0									0.0442J													
17-Nov-04		7.0									0.0971U													
22-Nov-04	9,140	7.0	--	--	0.0935U	0.787JB	--	--	--	0.82U	0.0900J	9.43U	1.0U	0.5U	--	--	--	0.727B	--	--	--	--	--	--
29-Nov-04		7.0									0.0962U													
07-Dec-04		7.0									0.0943U													
13-Dec-04		7.0									0.0637J													
20-Dec-04	9,100	7.0	4.0U	27	0.0962U	0.905B	1.0U	1.0U	2.0U	1.17U	0.0962U	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	0.550B	1.66B	66.7	8.35B	2670	--	--
30-Dec-04		7.0									0.0952U													
03-Jan-05		7.0									0.0952U													
10-Jan-05		7.0									0.114B													
18-Jan-05	10,800B	7.0	--	--	0.120	0.923B	--	--	--	2.65U	0.0595JB	9.52U	5.0U	0.5U	--	--	--	0.454B	--	--	--	--	--	--
25-Jan-05		7.0									0.049J													
02-Feb-05		7.0									0.074J													
08-Feb-05		7.0									0.039J													
15-Feb-05		7.0									0.051J													
28-Feb-05	--	7.0	--	--	0.096U	0.67B	--	--	--	0.43U	0.035J	4.7U	0.94U	0.5U	--	--	--	14	--	--	--	--	--	--
08-Mar-05	--	7.0	--	--	--	--	--	--	--	--	0.033J	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Mar-05		7.0									0.11U													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
22-Mar-05	3,500	7.0	5.0U	22	0.094U	0.37B	1.0U	1.0U	2.0U	1.4U	0.11U	4.7U	0.93	0.5U	1.0U	1.0U	1.0U	1.0U	7.4B	44	50U	2,400	ND	ND
30-Mar-05		7.0									0.11U													
05-Apr-05		7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06		7.0	--	--	0.098U	0.81B	--	--	--	--	0.11U	4.9U	0.97U	--	--	--	--	--	--	--	--	--	--	--
25-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Feb-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
07-Feb-06	--	7.0	--	--	0.097U	0.67B	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
15-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
23-Mar-06	9,900	6.5	5.0U	23	0.035J	0.68B	1.0U	1.0U	1.0U	0.32U	0.049J	4.7U	0.93U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	34	50U	2,300	ND	ND
30-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
06-Apr-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
04-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
11-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.8U	0.95U	--	--	--	--	--	--	--	--	--	--	--
08-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-06	6,000	6.5	5.0U	25	0.093U	0.43B	1.0U	1.0U	1.0U	0.87U	0.03J	4.8U	0.88J	0.50U	5.0U	5.0U	5.0U	3.0	4.3B	52	130	2,300	--	--
21-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-06	--	6.5	--	--	--	--	--	--	--	--	0.093U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Jul-06	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)

Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
-- = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit

RAC2 TECHNICAL STATUS REPORT

July 1, 2006 to July 28, 2006

WORK ASSIGNMENT NUMBER: 004-LRLR-05WE

SITE NAME: Penta Wood Products-OU1, WI

ACTIVITY: Long-Term Response Action

CH2M HILL JOB NUMBER: 344511

PREPARED BY: Bill Andrae/MKE, Site Manager

PERIOD ENDING: July 28, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

Task A (PP):

- On July 12, at the WAM's request, CH2M HILL submitted historical operation cost data for the Penta Wood facility.
- On July 19, CH2M HILL notified the WAM that the expenditure limit had been reached.
- On July 27, CH2M HILL received a WAF which increased the expenditure limit and initiated Tasks A, B, C, and D pending approval of the draft work plan.
- CH2M HILL continued work on the procurement of key subcontracts.

Summary of Project Status

Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete	Schedule Variance
A (PP)	07/01/06	07/01/06	03/14/11			0 days
B (PJ)	07/29/06	07/29/06	03/14/11			0 days
C (CV)	07/29/06	07/29/06	03/14/11			0 days
D (PC)	07/29/06	07/29/06	03/14/11			0 days
E (CO)	03/01/11		03/14/11			

2. **Problems Resolved**

The initial expenditure limit was reached; however, on July 27, CH2M HILL received a WAF which increased the expenditure limit and initiated Tasks A, B, C, and D pending approval of the draft work plan.

3. **Problem Areas and Recommended Solutions**

None.

4. **Deliverables Submitted**

On July 12, at the WAM's request, CH2M HILL submitted historical operation cost data for the Penta Wood facility.

5. **Activities Planned Next Reporting Period**

Task A (PP): CH2M HILL plans to perform monthly project management and will finalize procurement of key subcontracts.

Task B (PJ): CH2M HILL will begin operation of the system under this task. CH2M HILL plans to start the LNAPL evaluation as described in the draft work plan.

Task C (CV): CH2M HILL plans to start operational monitoring, if a laboratory subcontract can be issued.

Task D (PC): No work is planned for this task.

6. **Key Personnel Changes**

None.

7. **Subcontractor Services**

None.

8. **Travel**

None.

9. **Laboratories**

None.

10. **Project Performance**

CH2M HILL quickly assembled a project team to deliver the work plan in a timely manner and submitted the draft work plan on May 23 (to arrive on May 24), 1 day ahead of the scheduled due date of May 25.

RAC V TECHNICAL STATUS REPORT

July 29, 2006 to August 25, 2006

WORK ASSIGNMENT NUMBER: 201-RALR-05WE

SITE NAME: Penta Wood Products-OU1, WI

ACTIVITY: Long-Term Response Action

CH2M HILL JOB NUMBER: 184202

PREPARED BY: Bill Andrae/MKE, Site Manager
Mike Lehman/MKE, Assistant Site Manager

PERIOD ENDING: August 25, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

Project closeout related activities were performed during the reporting period.

Operation related efforts and cost have been transferred to the new RAC2 contract and work assignment.

Trailing costs for OMI's labor were applied to this work assignment during the reporting period.

Summary of Project Status					
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete
1-PP	09/30/03	09/30/03	07/28/06	07/28/06	100
3-DU	09/30/03	09/30/03	07/28/06	05/26/06	100
4-PB	09/30/03	09/30/03	07/28/06	05/26/06	100
5-MS	09/30/03	09/30/03	03/30/04	03/30/04	100
6-RI	09/30/03	09/30/03	03/30/04	03/30/04	100
7-CV	09/30/03	09/30/03	07/28/06	07/28/06	100
8-AI	09/30/03	09/30/03	07/28/06	07/28/06	100
9-PJ	09/30/03	09/30/03	07/28/06	07/28/06	100
11-CO	05/01/06	07/28/06	07/28/06		50

2. Problems Resolved

None.

3. **Problem Areas and Recommended Solutions**

None.

Change Order Status, Subcontract No. 308 Clearwater Technologies, Inc. Change Order submitted by CH2M HILL to USEPA (under WA #201)			
CO #1	Final actual quantity adjustment for the Equipment Installation, Option Period 2	$49,034	Approved

4. **Deliverables Submitted**

None.

5. **Activities Planned Next Reporting Period**

Trailing costs will be applied to the work assignment.

CH2M HILL plans to close out the work assignment.

6. **Key Personnel Changes**

None.

7. **Subcontractor Services**

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company
Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Earthworks:	Darcy Brust Excavating
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	USFilter/Westates
Hazardous Waste Disposal:	North Shore Environmental
Tank Cleaning and Decontamination Services:	MidAmerica
Instrumentation and Controls:	System Technology Services, Inc.
Equipment Installation:	Clearwater Technologies, Inc.
Treatment System Chemicals:	Glacier Pure, Inc.
Backwash System:	Environmental Field Services, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells

8. **Travel**

None.

9. **Laboratories**

The 2005–2006 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. Project Performance

The treatment system modifications added in 2003-2004 have significantly improved the overall performance of the granular activated carbon system. The carbon beds are effectively adsorbing dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 micrograms per liter (µg/L).

RAC2 TECHNICAL STATUS REPORT

July 29, 2006 to August 25, 2006

WORK ASSIGNMENT NUMBER:	004-LRLR-05WE
SITE NAME:	Penta Wood Products-OU1, WI
ACTIVITY:	Long-Term Response Action
CH2M HILL JOB NUMBER:	344511
PREPARED BY:	Bill Andrae/MKE, Site Manager
PERIOD ENDING:	August 25, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

Task A (PP):

- CH2M HILL performed routine monthly project management activities.
- CH2M HILL continued work on the procurement of key subcontracts.

Task B (PJ):

- CH2M HILL continued operation of the system under this task.
- CH2M HILL initiated to the LNAPL evaluation as described in the work plan.
- An estimated 1.02 million gallons (MG) of groundwater were treated and discharged during the reporting period. To date, a total of 48.73 MG of water have been treated. An estimated 391 gallons of light nonaqueous phase liquid (LNAPL) were recovered bringing the total recovered volume of LNAPL since March 2004 to approximately 18,247 gallons.
- On August 10, the well pump for EW-10 stopped pumping. Most likely this is due to worn gears on the pump and motor which has been observed on other pumps that have failed.
- The system was shut down on August 11 to prepare for a carbon changeout. The carbon changeout was performed on August 15. The system was restarted on August 21.
- The status of recommendations presented in the Remediation System Evaluation is summarized in a table located at the end of this document.

- The results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling are summarized in the chart located at the end of this document.

Summary of Project Status						
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete	Schedule Variance
A (PP)	07/01/06	07/01/06	03/14/11		4	0 days
B (PJ)	07/29/06	07/29/06	03/14/11		4	0 days
C (CV)	07/29/06	07/29/06	03/14/11		0	0 days
D (PC)	07/29/06	07/29/06	03/14/11		0	0 days
E (CO)	03/01/11		03/14/11		0	

2. **Problems Resolved**

   None.

3. **Problem Areas and Recommended Solutions**

   None.

4. **Deliverables Submitted**

   None.

5. **Activities Planned Next Reporting Period**

   Task A (PP): CH2M HILL plans to perform monthly project management and will finalize procurement of key subcontracts.

   Task B (PJ): CH2M HILL will begin operation of the system under this task. CH2M HILL plans to submit the LNAPL evaluation.

   The pump in EW-10 will be replaced as soon as possible.

   Task C (CV): CH2M HILL plans to start operational monitoring, when the laboratory subcontract is issued.

6. **Key Personnel Changes**

   None.

7. **Subcontractor Services**

   None.

8. **Travel**

   None.

9. **Laboratories**

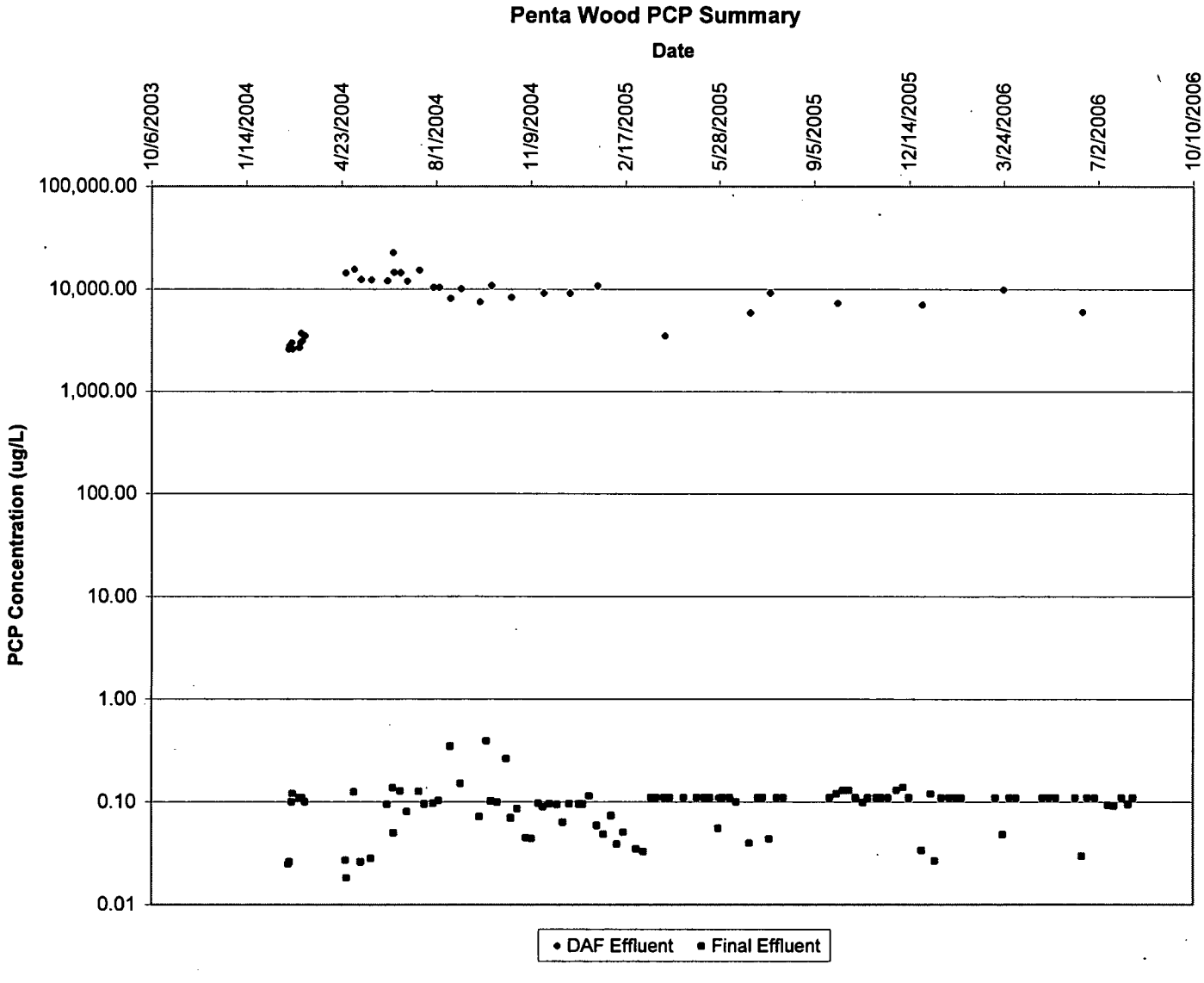
   None.

10. Project Performance

The carbon beds are continuing to effectively adsorb dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 micrograms per liter (µg/L).

REMEDIATION SYSTEM EVALUATION RECOMMENDATION STATUS

Recommendation	Status
Follow Water Quality Trends in Monitoring Wells to Determine if the Plume is Migrating	CH2M HILL will continue to evaluate the PCP data for MW-13 and the site to determine if plume migration is expanding and if additional monitoring sites may be needed. If continued increases are observed in MW-13, installation of a monitoring well to the east, in the direction of two residences, may be considered.
Provide More Accurate Prediction of Consumables and Disposal Costs	The budget for the new LTRA Work Plan will be more accurate because of the availability of actual costs.
Consider Modifying Management of GAC Units	CH2M HILL has requested preliminary cost information for the installation of backwash piping for the 10,000 pound units. The backwash pump installed in April 2005 is capable of supplying the necessary flow rate to backwash the larger GAC units.
Eliminate Redundant or Unnecessary Laboratory Analysis	Historical metals data were reviewed to verify elimination of total metals from the annual sampling of the monitoring wells and will not affect data evaluation. As instructed by USEPA, CH2M HILL will eliminate the total metals analysis from the groundwater sampling events. As instructed by USEPA, CH2M HILL will not eliminate the spring sampling event until sufficient data exists in order to fully evaluate the contaminant plume.
Savings From the Use of Dedicated Pumps in Monitoring Wells	CH2M HILL is reducing the field staff for the 2006 spring sampling event and will evaluate the overall level of effort versus previous sampling events. CH2M HILL will also evaluate the potential for the plant operator to serve as a field team member to further reduce travel costs.
Investigate Possibility of Declassifying Waste	CH2M HILL investigated the possibility of declassifying the waste and determined that this action is not feasible due to the continued presence of LNAPL in the ground considered to be a listed hazardous waste.
Decrease Project Management/ Reporting Costs	CH2M HILL expects project management costs to decrease during the new LTRA work assignment. Data management costs may remain high due to the volume of analytical data generated for the site and the level of effort associated with meeting USEPA reporting requirements.
Develop Tracking of Routine and Non-Routine Costs	For the new LTRA work assignment, CH2M HILL will develop a tracking system to assist in analyzing routine and non-routine maintenance activities, the associated costs, and possible ways to reduce the costs.
Evaluate Potential to Reduce Ground Water Extraction without Substantially Affecting LNAPL Recovery	As part of the data evaluation activities for the new LTRA work assignment, CH2M HILL will continue to evaluate LNAPL recovery and dissolved plume containment to determine the potential for reduced groundwater pumping.
Adjust pH to 6.5 instead of 7.0	As instructed by USEPA, CH2M HILL has implemented this recommendation.
Transition From Ground Water Extraction and LNAPL Recovery System To Bioventing System and Intrinsic Remediation	As part of the new LTRA work assignment, CH2M HILL will review and reevaluate subsurface conditions and the potential impacts of operating the biovent system concurrently with the groundwater and LNAPL extraction systems and present a recommendation to USEPA for review and possible implementation.


Penta Wood PCP Summary
Date
10/6/2003
1/14/2004
4/23/2004
8/1/2004
11/9/2004
2/17/2005
5/28/2005
9/5/2005
12/14/2005
3/24/2006
7/2/2006
10/10/2006
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
PCP Concentration (ug/L)
DAF Effluent
Final Effluent

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04		7.0									0.265B													
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													
04-Nov-04		7.0									0.0447J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
05-Apr-05		7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--
06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbanzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06		7.0	--	--	0.098U	0.81B	--	--	--	--	0.11U	4.9U	0.97U	--	--	--	--	--	--	--	--	--	--	--
25-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Feb-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
07-Feb-06	--	7.0	--	--	0.097U	0.67B	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
15-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
23-Mar-06	9,900	6.5	5.0U	23	0.035J	0.68B	1.0U	1.0U	1.0U	0.32U	0.049J	4.7U	0.93U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	34	50U	2,300	ND	ND
30-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
06-Apr-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
04-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
11-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.8U	0.95U	--	--	--	--	--	--	--	--	--	--	--
08-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-06	6,000	6.5	5.0U	25	0.093U	0.43B	1.0U	1.0U	1.0U	0.87U	0.03J	4.8U	0.88J	0.50U	5.0U	5.0U	5.0U	3.0	4.3B	52	130	2,300	--	--
21-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-06	--	6.5	--	--	--	--	--	--	--	--	0.093U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Jul-06	*NR	6.5	*NR	*NR	0.096U	0.61B	*NR	*NR	*NR	*NR	0.092U	4.7U	0.93U	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR
27Jul-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
03-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.095U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
24-Aug-06	*NR	6.5	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR

Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
-- = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit

RAC V TECHNICAL STATUS REPORT

August 26, 2006 to September 29, 2006

WORK ASSIGNMENT NUMBER: 201-RALR-05WE

SITE NAME: Penta Wood Products-OU1, WI

ACTIVITY: Long-Term Response Action

CH2M HILL JOB NUMBER: 184202

PREPARED BY: Bill Andrae/MKE, Site Manager
Mike Lehman/MKE, Assistant Site Manager

PERIOD ENDING: September 29, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

Project closeout related activities were performed during the reporting period.

Operation related efforts and cost have been transferred to the new RAC2 contract and work assignment.

Summary of Project Status					
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete
1-PP	09/30/03	09/30/03	07/28/06	07/28/06	100
3-DU	09/30/03	09/30/03	07/28/06	05/26/06	100
4-PB	09/30/03	09/30/03	07/28/06	05/26/06	100
5-MS	09/30/03	09/30/03	03/30/04	03/30/04	100
6-RI	09/30/03	09/30/03	03/30/04	03/30/04	100
7-CV	09/30/03	09/30/03	07/28/06	07/28/06	100
8-AI	09/30/03	09/30/03	07/28/06	07/28/06	100
9-PJ	09/30/03	09/30/03	07/28/06	07/28/06	100
11-CO	05/01/06	07/28/06	07/28/06		100

2. Problems Resolved

None.

3. **Problem Areas and Recommended Solutions**

None.

Change Order Status, Subcontract No. 308 Clearwater Technologies, Inc. Change Order submitted by CH2M HILL to USEPA (under WA #201)			
CO #1	Final actual quantity adjustment for the Equipment Installation, Option Period 2	$49,034	Approved

4. **Deliverables Submitted**

None.

5. **Activities Planned Next Reporting Period**

- Trailing costs will be applied to the work assignment.
- CH2M HILL plans to close out the work assignment.

6. **Key Personnel Changes**

None.

7. **Subcontractor Services**

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company
Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Earthworks:	Darcy Brust Excavating
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	USFilter/Westates
Hazardous Waste Disposal:	North Shore Environmental
Tank Cleaning and Decontamination Services:	MidAmerica
Instrumentation and Controls:	System Technology Services, Inc.
Equipment Installation:	Clearwater Technologies, Inc.
Treatment System Chemicals:	Glacier Pure, Inc.
Backwash System:	Environmental Field Services, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells

8. **Travel**

None.

9. **Laboratories**

The 2005–2006 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. Project Performance

None.

RAC2 TECHNICAL STATUS REPORT

August 26, 2006 to September 29, 2006

WORK ASSIGNMENT NUMBER: 004-LRLR-05WE

SITE NAME: Penta Wood Products-OU1, WI

ACTIVITY: Long-Term Response Action

CH2M HILL JOB NUMBER: 344511

PREPARED BY: Bill Andrae/MKE, Site Manager

PERIOD ENDING: September 29, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

Task A (PP):

- Performed routine monthly project management activities.
- Continued work on the procurement of key subcontracts.

Task B (PJ):

- Continued operation of the system under this task.
- Initiated the light nonaqueous phase liquid (LNAPL) evaluation as described in the work plan.
- Treated and discharged an estimated 0.40 million gallons (MG) of groundwater during the reporting period. To date, a total of 49.13 MG of water have been treated. An estimated 8 gallons of LNAPL were recovered bringing the total recovered volume of LNAPL since March 2004 to approximately 18,255 gallons.
- Opened bids for the hazardous waste disposal subcontract on August 28. The apparent low bidder is North Shore Environmental Services. This is the same firm that was providing hazardous waste disposal services under the RAC V contract.
- Repaired air compressor on September 22. On August 28, the main air compressor failed. The air compressor service company used previously to service the compressors at the site is no longer in business. It took a while to locate and subcontract with a new qualified air compressor service company. The system was restarted on September 26.

- Initiated cleanup of treatment system equipment. During the shutdown period, the operator cleaned and serviced mixer motors, pumps, and other treatment system equipment.
- Conducted the annual groundwater sampling event the week of September 25. The sampling team was unable to collect samples from all the designated wells due to uncharacteristically low water levels. All the residential wells were sampled.
- Summarized the status of recommendations presented in the Remediation System Evaluation in a table located at the end of this document.
- Summarized the results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling in the chart located at the end of this document.

Summary of Project Status						
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete	Schedule Variance
A (PP)	07/01/06	07/01/06	03/14/11		6	0 days
B (PJ)	07/29/06	07/29/06	03/14/11		6	0 days
C (CV)	07/29/06	07/29/06	03/14/11		0	0 days
D (PC)	07/29/06	07/29/06	03/14/11		0	0 days
E (CO)	03/01/11		03/14/11		0	

2. **Problems Resolved**

None.

3. **Problem Areas and Recommended Solutions**

None.

4. **Deliverables Submitted**

None.

5. **Activities Planned Next Reporting Period**

Task A (PP): CH2M HILL plans to perform monthly project management and will finalize procurement of key subcontracts.

Task B (PJ): CH2M HILL will begin operation of the system under this task. CH2M HILL plans to submit the LNAPL evaluation.

The pump in EW-10 will be replaced as soon as possible.

Task C (CV): CH2M HILL plans to start operational monitoring, when the laboratory subcontract is issued.

6. **Key Personnel Changes**

None.

7. **Subcontractor Services**

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company
Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	Siemens Water Technologies, Inc.
Hazardous Waste Disposal:	North Shore Environmental
Treatment System Chemicals:	Glacier Pure, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells

8. **Travel**

Dave Shekoski, Jon Tortomasi, and Adrienne Unger traveled to the site on September 25 and returned on September 28 for the annual groundwater sampling event. Travel charges will be invoiced during the next reporting period.

9. **Laboratories**

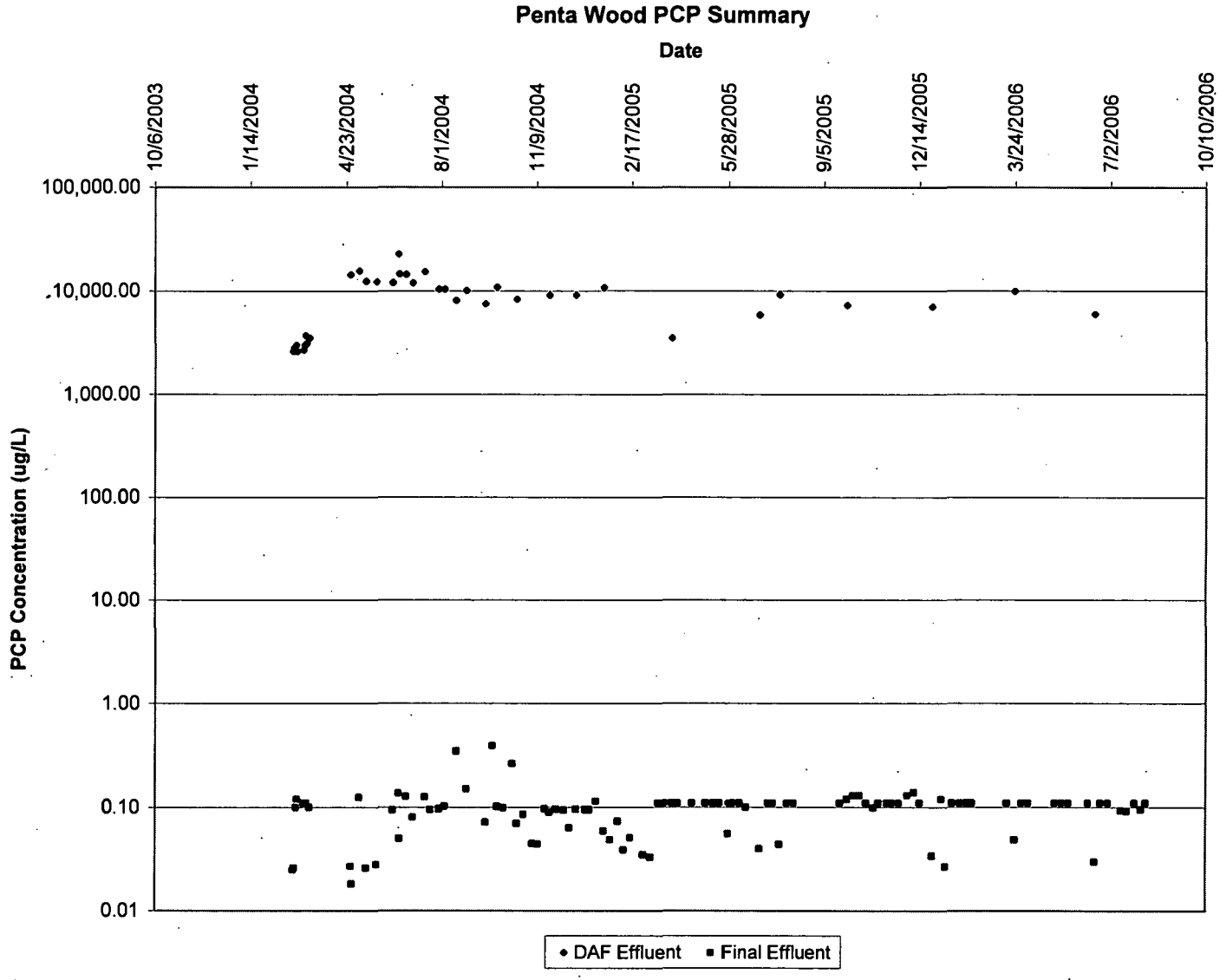
The 2006-2008 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. **Project Performance**

The carbon beds are continuing to effectively adsorb dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 micrograms per liter (µg/L).

REMEDIATION SYSTEM EVALUATION RECOMMENDATION STATUS

Recommendation	Status
Follow Water Quality Trends in Monitoring Wells to Determine if the Plume is Migrating	CH2M HILL will continue to evaluate the PCP data for MW-13 and the site to determine if plume migration is expanding and if additional monitoring sites may be needed. If continued increases are observed in MW-13, installation of a monitoring well to the east, in the direction of two residences, may be considered.
Provide More Accurate Prediction of Consumables and Disposal Costs	The budget for the new LTRA Work Plan will be more accurate because of the availability of actual costs.
Consider Modifying Management of GAC Units	CH2M HILL has requested preliminary cost information for the installation of backwash piping for the 10,000 pound units. The backwash pump installed in April 2005 is capable of supplying the necessary flow rate to backwash the larger GAC units.
Eliminate Redundant or Unnecessary Laboratory Analysis	Historical metals data were reviewed to verify elimination of total metals from the annual sampling of the monitoring wells and will not affect data evaluation. As instructed by USEPA, CH2M HILL will eliminate the total metals analysis from the groundwater sampling events. As instructed by USEPA, CH2M HILL will not eliminate the spring sampling event until sufficient data exists in order to fully evaluate the contaminant plume.
Savings From the Use of Dedicated Pumps in Monitoring Wells	CH2M HILL is reducing the field staff for the 2006 spring sampling event and will evaluate the overall level of effort versus previous sampling events. CH2M HILL will also evaluate the potential for the plant operator to serve as a field team member to further reduce travel costs.
Investigate Possibility of Declassifying Waste	CH2M HILL investigated the possibility of declassifying the waste and determined that this action is not feasible due to the continued presence of LNAPL in the ground considered to be a listed hazardous waste.
Decrease Project Management/ Reporting Costs	CH2M HILL expects project management costs to decrease during the new LTRA work assignment. Data management costs may remain high due to the volume of analytical data generated for the site and the level of effort associated with meeting USEPA reporting requirements.
Develop Tracking of Routine and Non-Routine Costs	For the new LTRA work assignment, CH2M HILL will develop a tracking system to assist in analyzing routine and non-routine maintenance activities, the associated costs, and possible ways to reduce the costs.
Evaluate Potential to Reduce Ground Water Extraction without Substantially Affecting LNAPL Recovery	As part of the data evaluation activities for the new LTRA work assignment, CH2M HILL will continue to evaluate LNAPL recovery and dissolved plume containment to determine the potential for reduced groundwater pumping.
Adjust pH to 6.5 instead of 7.0	As instructed by USEPA, CH2M HILL has implemented this recommendation.
Transition From Ground Water Extraction and LNAPL Recovery System To Bioventing System and Intrinsic Remediation	As part of the new LTRA work assignment, CH2M HILL will review and reevaluate subsurface conditions and the potential impacts of operating the biovent system concurrently with the groundwater and LNAPL extraction systems and present a recommendation to USEPA for review and possible implementation.


Penta Wood PCP Summary
Date
10/6/2003
1/14/2004
4/23/2004
8/1/2004
11/9/2004
2/17/2005
5/28/2005
9/5/2005
12/14/2005
3/24/2006
7/2/2006
10/10/2006
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
PCP Concentration (ug/L)
DAF Effluent
Final Effluent

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04		7.0									0.265B													
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													
04-Nov-04		7.0									0.0447J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Nov-04		7.0									0.0442J													
17-Nov-04		7.0									0.0971U													
22-Nov-04	9,140	7.0	--	--	0.0935U	0.787JB	--	--	--	0.82U	0.0900J	9.43U	1.0U	0.5U	--	--	--	0.727B	--	--	--	--	--	--
29-Nov-04		7.0									0.0962U													
07-Dec-04		7.0									0.0943U													
13-Dec-04		7.0									0.0637J													
20-Dec-04	9,100	7.0	4.0U	27	0.0962U	0.905B	1.0U	1.0U	2.0U	1.17U	0.0962U	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	0.550B	1.66B	66.7	8.35B	2670	--	--
30-Dec-04		7.0									0.0952U													
03-Jan-05		7.0									0.0952U													
10-Jan-05		7.0									0.114B													
18-Jan-05	10,800B	7.0	--	--	0.120	0.923B	--	--	--	2.65U	0.0595JB	9.52U	5.0U	0.5U	--	--	--	0.454B	--	--	--	--	--	--
25-Jan-05		7.0									0.049J													
02-Feb-05		7.0									0.074J													
08-Feb-05		7.0									0.039J													
15-Feb-05		7.0									0.051J													
28-Feb-05	--	7.0	--	--	0.096U	0.67B	--	--	--	0.43U	0.035J	4.7U	0.94U	0.5U	--	--	--	14	--	--	--	--	--	--
08-Mar-05	--	7.0	--	--	--	--	--	--	--	--	0.033J	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Mar-05		7.0									0.11U													
22-Mar-05	3,500	7.0	5.0U	22	0.094U	0.37B	1.0U	1.0U	2.0U	1.4U	0.11U	4.7U	0.93	0.5U	1.0U	1.0U	1.0U	1.0U	7.4B	44	50U	2,400	ND	ND
30-Mar-05		7.0									0.11U													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
05-Apr-05		7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--
06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06		7.0	--	--	0.098U	0.81B	--	--	--	--	0.11U	4.9U	0.97U	--	--	--	--	--	--	--	--	--	--	--
25-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Feb-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
07-Feb-06	--	7.0	--	--	0.097U	0.67B	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
15-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
23-Mar-06	9,900	6.5	5.0U	23	0.035J	0.68B	1.0U	1.0U	1.0U	0.32U	0.049J	4.7U	0.93U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	34	50U	2,300	ND	ND
30-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
06-Apr-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
04-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
11-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.8U	0.95U	--	--	--	--	--	--	--	--	--	--	--
08-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-06	6,000	6.5	5.0U	25	0.093U	0.43B	1.0U	1.0U	1.0U	0.87U	0.03J	4.8U	0.88J	0.50U	5.0U	5.0U	5.0U	3.0	4.3B	52	130	2,300	--	--
21-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-06	--	6.5	--	--	--	--	--	--	--	--	0.093U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Jul-06	--	6.5	--	--	0.096U	0.61B	*NR	*NR	*NR	*NR	0.092U	4.7U	0.93U	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR
27Jul-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
03-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.095U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
24-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.095U	--	--	--	--	--	--	--	--	--	--	--	--	--

Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
-- = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit

RAC2 TECHNICAL STATUS REPORT

September 30, 2006 to October 27, 2006

WORK ASSIGNMENT NUMBER: 004-LRLR-05WE

SITE NAME: Penta Wood Products-OU1, WI

ACTIVITY: Long-Term Response Action

CH2M HILL JOB NUMBER: 344511

PREPARED BY: Bill Andrae/MKE, Site Manager

PERIOD ENDING: October 27, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

Task A (PP):

- Performed routine monthly project management activities.
- Continued work on the procurement of key subcontracts.

Task B (PJ):

- Continued operation of the system under this task.
- Submitted the light nonaqueous phase liquid (LNAPL) evaluation on October 23 as described in the work plan.
- Treated and discharged an estimated 0.21 million gallons (MG) of groundwater during the reporting period. To date, a total of 49.34 MG of water have been treated. An estimated 92 gallons of LNAPL were recovered bringing the total recovered volume of LNAPL since March 2004 to approximately 18,347 gallons.
- Shut down the system on October 5 due to high pressure in the lead carbon vessel. An interim subcontract for a changeout was prepared and executed and the carbon was changed out on October 26.
- On October 6, a technical representative of USWater Services (polymer vendor) was onsite to conduct jar testing to help determine why the DAF effluent water quality is not as good as it has been previously. The jar testing indicated that the polymer delivery system may not be providing the correct dosage. Another theory is that since Well Pump No. 10 is not operating, there may be less emulsified oil in the water, and the ferric sulfate is not being completely removed

in the DAF. The operator performed a thorough cleaning of the polymer delivery system and slightly increased the dosage of the anionic polymer.

- On October 17, North Shore Environmental Services was onsite to load and transport approximately 45,000 pounds of spent carbon to the approved offsite disposal facility.
- On October 18, the carbon change out solicitation was sent out to perspective firms. The bids are due back on November 3.
- Performed additional cleanup of the treatment system equipment. During the shutdown period, the operator cleaned and serviced mixer motors, pumps, and other treatment system equipment.
- Summarized the status of recommendations presented in the Remediation System Evaluation in a table located at the end of this document.
- Summarized the results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling in the chart located at the end of this document. The sample result on September 27 exceeded the target discharge limit of 0.1 micrograms per liter (µg/L); however, the following samples had no detectable concentration of PCP.

Summary of Project Status						
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete	Schedule Variance
A (PP)	07/01/06	07/01/06	03/14/11		13	0 days
B (PJ)	07/29/06	07/29/06	03/14/11		13	0 days
C (CV)	07/29/06	07/29/06	03/14/11		5	0 days
D (PC)	07/29/06	07/29/06	03/14/11		0	0 days
E (CO)	03/01/11		03/14/11		0	0 days

2. **Problems Resolved**

None.

3. **Problem Areas and Recommended Solutions**

None.

4. **Deliverables Submitted**

On October 23, CH2M HILL submitted the LNAPL evaluation as described in the work plan.

5. **Activities Planned Next Reporting Period**

Task A (PP): CH2M HILL plans to perform monthly project management and will finalize procurement of key subcontracts.

Task B (PJ): CH2M HILL will continue operation of the system under this task.

The pump in EW-10 will be replaced as soon as possible.

Task C (CV): CH2M HILL will continue to conduct operational monitoring.

6. **Key Personnel Changes**

None.

7. **Subcontractor Services**

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company
Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	Siemens Water Technologies, Inc.
Hazardous Waste Disposal:	North Shore Environmental
Treatment System Chemicals:	Glacier Pure, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells

8. **Travel**

Travel for Dave Shekoski, Jon Tortomosi and Adrienne Unger was reported in last month's Technical Status Report.

9. **Laboratories**

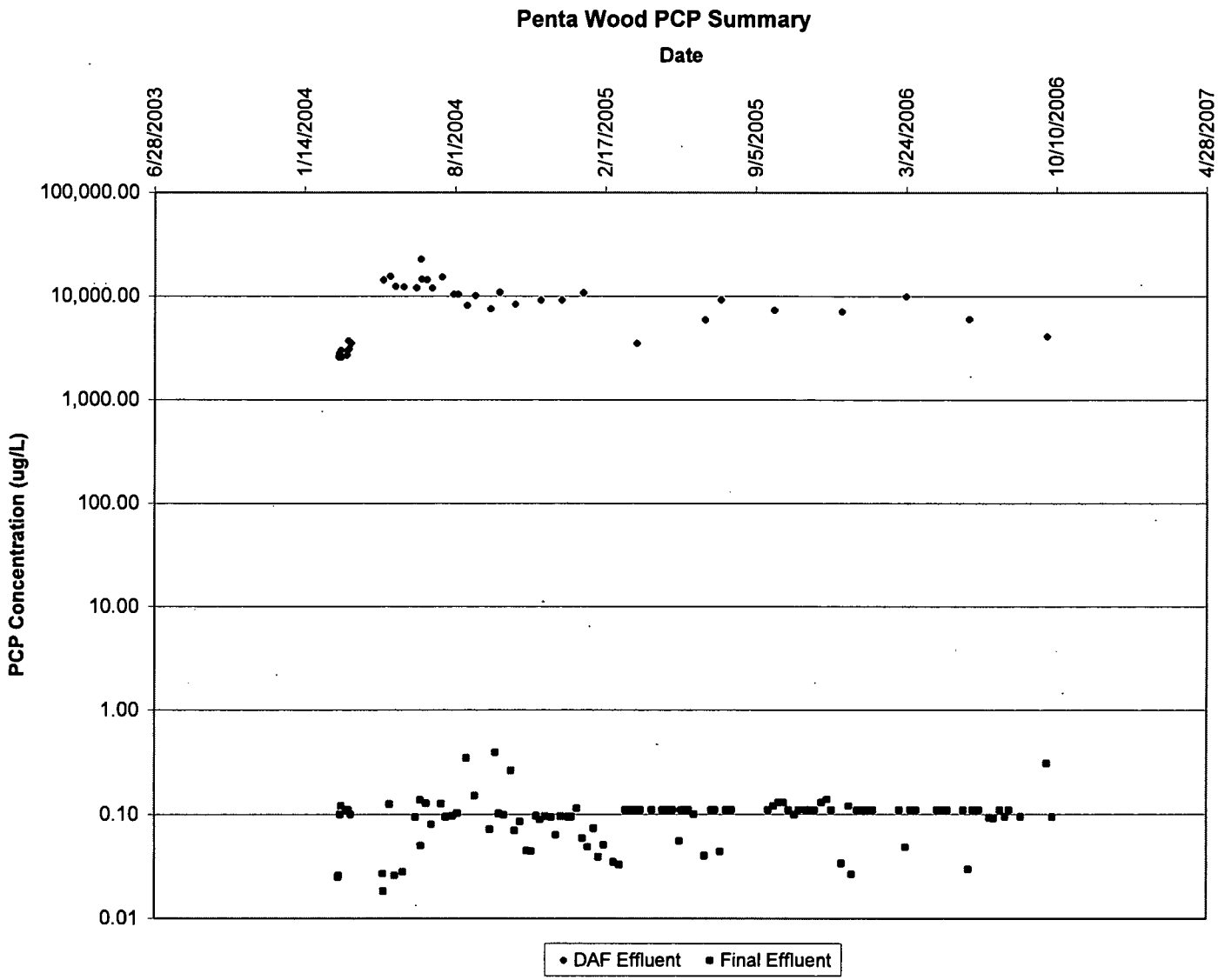
The 2006-2008 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. **Project Performance**

The carbon beds are continuing to effectively adsorb dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 µg/L.

REMEDIATION SYSTEM EVALUATION RECOMMENDATION STATUS

Recommendation	Status
Follow Water Quality Trends in Monitoring Wells to Determine if the Plume is Migrating	CH2M HILL will continue to evaluate the PCP data for MW-13 and the site to determine if plume migration is expanding and if additional monitoring sites may be needed. If continued increases are observed in MW-13, installation of a monitoring well to the east, in the direction of two residences, may be considered.
Provide More Accurate Prediction of Consumables and Disposal Costs	The budget for the new LTRA Work Plan will be more accurate because of the availability of actual costs.
Consider Modifying Management of GAC Units	CH2M HILL has requested preliminary cost information for the installation of backwash piping for the 10,000 pound units. The backwash pump installed in April 2005 is capable of supplying the necessary flow rate to backwash the larger GAC units.
Eliminate Redundant or Unnecessary Laboratory Analysis	Historical metals data were reviewed to verify elimination of total metals from the annual sampling of the monitoring wells and will not affect data evaluation. As instructed by USEPA, CH2M HILL will eliminate the total metals analysis from the groundwater sampling events. As instructed by USEPA, CH2M HILL will not eliminate the spring sampling event until sufficient data exists in order to fully evaluate the contaminant plume.
Savings From the Use of Dedicated Pumps in Monitoring Wells	CH2M HILL is reducing the field staff for the 2006 spring sampling event and will evaluate the overall level of effort versus previous sampling events. CH2M HILL will also evaluate the potential for the plant operator to serve as a field team member to further reduce travel costs.
Investigate Possibility of Declassifying Waste	CH2M HILL investigated the possibility of declassifying the waste and determined that this action is not feasible due to the continued presence of LNAPL in the ground considered to be a listed hazardous waste.
Decrease Project Management/ Reporting Costs	CH2M HILL expects project management costs to decrease during the new LTRA work assignment. Data management costs may remain high due to the volume of analytical data generated for the site and the level of effort associated with meeting USEPA reporting requirements.
Develop Tracking of Routine and Non-Routine Costs	For the new LTRA work assignment, CH2M HILL will develop a tracking system to assist in analyzing routine and non-routine maintenance activities, the associated costs, and possible ways to reduce the costs.
Evaluate Potential to Reduce Ground Water Extraction without Substantially Affecting LNAPL Recovery	As part of the data evaluation activities for the new LTRA work assignment, CH2M HILL will continue to evaluate LNAPL recovery and dissolved plume containment to determine the potential for reduced groundwater pumping.
Adjust pH to 6.5 instead of 7.0	As instructed by USEPA, CH2M HILL has implemented this recommendation.
Transition From Ground Water Extraction and LNAPL Recovery System To Bioventing System and Intrinsic Remediation	As part of the new LTRA work assignment, CH2M HILL will review and reevaluate subsurface conditions and the potential impacts of operating the bioventing system concurrently with the groundwater and LNAPL extraction systems and present a recommendation to USEPA for review and possible implementation.


Penta Wood PCP Summary
Date
6/28/2003
1/14/2004
8/1/2004
2/17/2005
9/5/2005
3/24/2006
10/10/2006
4/28/2007
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
PCP Concentration (ug/L)
DAF Effluent
Final Effluent

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04		7.0									0.265B													
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													
04-Nov-04		7.0									0.0447J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Nov-04		7.0									0.0442J													
17-Nov-04		7.0									0.0971U													
22-Nov-04	9,140	7.0	--	--	0.0935U	0.787JB	--	--	--	0.82U	0.0900J	9.43U	1.0U	0.5U	--	--	--	0.727B	--	--	--	--	--	--
29-Nov-04		7.0									0.0962U													
07-Dec-04		7.0									0.0943U													
13-Dec-04		7.0									0.0637J													
20-Dec-04	9,100	7.0	4.0U	27	0.0962U	0.905B	1.0U	1.0U	2.0U	1.17U	0.0962U	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	0.550B	1.66B	66.7	8.35B	2670	--	--
30-Dec-04		7.0									0.0952U													
03-Jan-05		7.0									0.0952U													
10-Jan-05		7.0									0.114B													
18-Jan-05	10,800B	7.0	--	--	0.120	0.923B	--	--	--	2.65U	0.0595JB	9.52U	5.0U	0.5U	--	--	--	0.454B	--	--	--	--	--	--
25-Jan-05		7.0									0.049J													
02-Feb-05		7.0									0.074J													
08-Feb-05		7.0									0.039J													
15-Feb-05		7.0									0.051J													
28-Feb-05	--	7.0	--	--	0.096U	0.67B	--	--	--	0.43U	0.035J	4.7U	0.94U	0.5U	--	--	--	14	--	--	--	--	--	--
08-Mar-05	--	7.0	--	--	--	--	--	--	--	--	0.033J	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Mar-05		7.0									0.11U													
22-Mar-05	3,500	7.0	5.0U	22	0.094U	0.37B	1.0U	1.0U	2.0U	1.4U	0.11U	4.7U	0.93	0.5U	1.0U	1.0U	1.0U	1.0U	7.4B	44	50U	2,400	ND	ND
30-Mar-05		7.0									0.11U													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
05-Apr-05		7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--
06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06		7.0	--	--	0.098U	0.81B	--	--	--	--	0.11U	4.9U	0.97U	--	--	--	--	--	--	--	--	--	--	--
25-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Feb-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
07-Feb-06	--	7.0	--	--	0.097U	0.67B	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
15-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
23-Mar-06	9,900	6.5	5.0U	23	0.035J	0.68B	1.0U	1.0U	1.0U	0.32U	0.049J	4.7U	0.93U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	34	50U	2,300	ND	ND
30-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
06-Apr-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
04-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

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11-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.8U	0.95U	--	--	--	--	--	--	--	--	--	--	--
08-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-06	6,000	6.5	5.0U	25	0.093U	0.43B	1.0U	1.0U	1.0U	0.87U	0.03J	4.8U	0.88J	0.50U	5.0U	5.0U	5.0U	3.0	4.3B	52	130	2,300	--	--
21-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-06	--	6.5	--	--	--	--	--	--	--	--	0.093U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Jul-06	--	6.5	--	--	0.096U	0.61B	*NR	*NR	*NR	*NR	0.092U	4.7U	0.93U	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR
27Jul-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
03-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.095U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
24-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.095U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Sept-06	4,100	6.5	5.0U	20	0.018U	0.89B	1.0U	1.0U	1.0U	1.6U	0.31	4.5U	0.91U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	39	50	2,000	--	--
05-Oct-06	--	6.5	--	--	--	--	--	--	--	--	0.094U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)

Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
-- = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit

RAC2 TECHNICAL STATUS REPORT

October 28, 2006 to November 24, 2006

WORK ASSIGNMENT NUMBER: 004-LRLR-05WE

SITE NAME: Penta Wood Products-OU1, WI

ACTIVITY: Long-Term Response Action

CH2M HILL JOB NUMBER: 344511

PREPARED BY: Bill Andrae/MKE, Site Manager

PERIOD ENDING: November 24, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

Task A (PP):

- Performed routine monthly project management activities.
- Continued work on the procurement of key subcontracts.

Task B (PJ):

- Continued operation of the system under this task.
- Treated and discharged an estimated 1.2 million gallons (MG) of groundwater during the reporting period. To date, a total of 50.54 MG of water have been treated. An estimated 688 gallons of light nonaqueous phase liquid (LNAPL) were recovered bringing the total recovered volume of LNAPL since March 2004 to approximately 19,035 gallons.
- A carbon changeout was performed on October 28. The system was restarted on November 1.
- On November 10, WDC was onsite to replace the well pumps in Extraction Well Nos. 10 and 11. The pumps were restarted; however, Well Pump No. 11 is still not functioning due to issues with the variable frequency drive. An instrumentation electrician will be contacted to inspect the drive and repair or replace it.
- The turbidity of the dissolved air flotation unit has decreased since Well Pump No. 10 returned to operation. The jar testing performed last reporting period seems to have confirmed the theory that the water from Extraction Well No. 10

contributes a significant amount of emulsified oil to the system, and if it is not operating, the ferric sulfate and polymer dosage need to be readjusted.

- During the reporting period, both heating units were inspected and repaired.
- On November 2, CH2M HILL gave advanced notification to USEPA of the subcontract award for the road maintenance and erosion control and repair work.
- On November 3, responses to the carbon change out solicitation were received from four firms. The responses were evaluated during the reporting period.
- The status of recommendations presented in the Remediation System Evaluation are summarized in a table located at the end of this document.
- The results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling were summarized and are presented in the chart located at the end of this document. There were no exceedances of the PCP target discharge limit of 0.1 micrograms per liter (µg/L).

Summary of Project Status						
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete	Schedule Variance
A (PP)	07/01/06	07/01/06	03/14/11		13	0 days
B (PJ)	07/29/06	07/29/06	03/14/11		13	0 days
C (CV)	07/29/06	07/29/06	03/14/11		7	0 days
D (PC)	07/29/06	07/29/06	03/14/11		0	0 days
E (CO)	03/01/11		03/14/11		0	0 days

2. **Problems Resolved**

None.

3. **Problem Areas and Recommended Solutions**

None.

4. **Deliverables Submitted**

None.

5. **Activities Planned Next Reporting Period**

Task A (PP): CH2M HILL plans to perform monthly project management and will finalize procurement of key subcontracts.

CH2M HILL plans to award the carbon changeout subcontract.

Task B (PJ): CH2M HILL will continue operation of the system under this task.

The variable frequency drive for the pump in EW-11 will be repaired or replaced.

Task C (CV): CH2M HILL will continue to conduct operational monitoring.

6. **Key Personnel Changes**

None.

7. **Subcontractor Services**

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company
Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	Siemens Water Technologies, Inc.
Hazardous Waste Disposal:	North Shore Environmental
Treatment System Chemicals:	Glacier Pure, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells
Road Maintenance, Erosion Control, and Repair:	Brust Excavating

8. **Travel**

None.

9. **Laboratories**

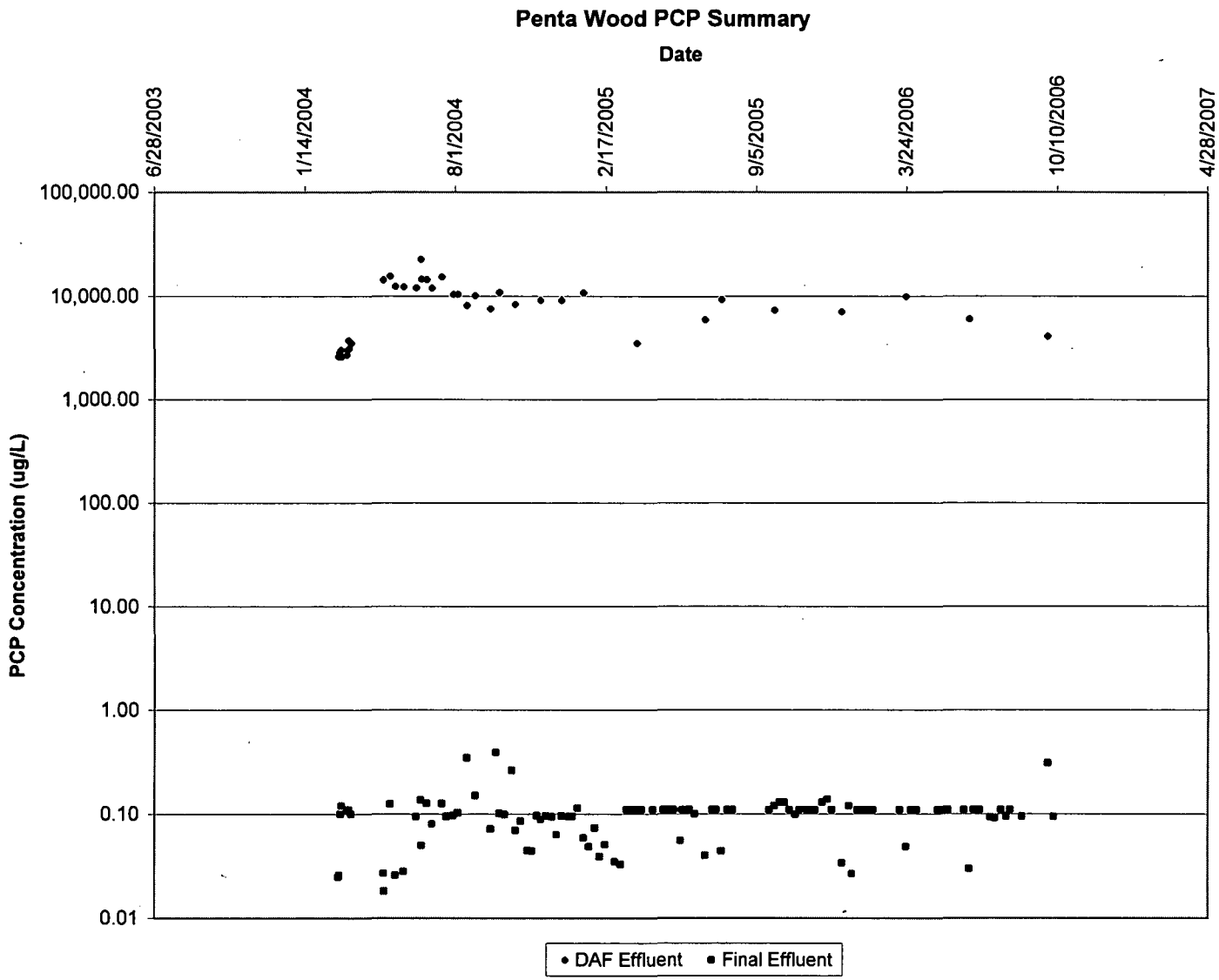
The 2006–2008 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. **Project Performance**

The carbon beds are continuing to effectively adsorb dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 µg/L.

REMEDIATION SYSTEM EVALUATION RECOMMENDATION STATUS

Recommendation	Status
Follow Water Quality Trends in Monitoring Wells to Determine if the Plume is Migrating	CH2M HILL will continue to evaluate the PCP data for MW-13 and the site to determine if plume migration is expanding and if additional monitoring sites may be needed. If continued increases are observed in MW-13, installation of a monitoring well to the east, in the direction of two residences, may be considered.
Provide More Accurate Prediction of Consumables and Disposal Costs	The budget for the new LTRA Work Plan will be more accurate because of the availability of actual costs.
Consider Modifying Management of GAC Units	CH2M HILL has requested preliminary cost information for the installation of backwash piping for the 10,000 pound units. The backwash pump installed in April 2005 is capable of supplying the necessary flow rate to backwash the larger GAC units.
Eliminate Redundant or Unnecessary Laboratory Analysis	Historical metals data were reviewed to verify elimination of total metals from the annual sampling of the monitoring wells and will not affect data evaluation. As instructed by USEPA, CH2M HILL will eliminate the total metals analysis from the groundwater sampling events. As instructed by USEPA, CH2M HILL will not eliminate the spring sampling event until sufficient data exists in order to fully evaluate the contaminant plume.
Savings From the Use of Dedicated Pumps in Monitoring Wells	CH2M HILL is reducing the field staff for the 2006 spring sampling event and will evaluate the overall level of effort versus previous sampling events. CH2M HILL will also evaluate the potential for the plant operator to serve as a field team member to further reduce travel costs.
Investigate Possibility of Declassifying Waste	CH2M HILL investigated the possibility of declassifying the waste and determined that this action is not feasible due to the continued presence of LNAPL in the ground considered to be a listed hazardous waste.
Decrease Project Management/ Reporting Costs	CH2M HILL expects project management costs to decrease during the new LTRA work assignment. Data management costs may remain high due to the volume of analytical data generated for the site and the level of effort associated with meeting USEPA reporting requirements.
Develop Tracking of Routine and Non-Routine Costs	For the new LTRA work assignment, CH2M HILL will develop a tracking system to assist in analyzing routine and non-routine maintenance activities, the associated costs, and possible ways to reduce the costs.
Evaluate Potential to Reduce Ground Water Extraction without Substantially Affecting LNAPL Recovery	As part of the data evaluation activities for the new LTRA work assignment, CH2M HILL will continue to evaluate LNAPL recovery and dissolved plume containment to determine the potential for reduced groundwater pumping.
Adjust pH to 6.5 instead of 7.0	As instructed by USEPA, CH2M HILL has implemented this recommendation.
Transition From Ground Water Extraction and LNAPL Recovery System To Bioventing System and Intrinsic Remediation	As part of the new LTRA work assignment, CH2M HILL will review and reevaluate subsurface conditions and the potential impacts of operating the bioventing system concurrently with the groundwater and LNAPL extraction systems and present a recommendation to USEPA for review and possible implementation.


Penta Wood PCP Summary
Date
6/28/2003
1/14/2004
8/1/2004
2/17/2005
9/5/2005
3/24/2006
10/10/2006
4/28/2007
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
PCP Concentration (ug/L)
DAF Effluent
Final Effluent

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04	.	7.0									0.265B													
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													
04-Nov-04		7.0									0.0447J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Nov-04		7.0									0.0442J													
17-Nov-04		7.0									0.0971U													
22-Nov-04	9,140	7.0	--	--	0.0935U	0.787JB	--	--	--	0.82U	0.0900J	9.43U	1.0U	0.5U	--	--	--	0.727B	--	--	--	--	--	--
29-Nov-04		7.0									0.0962U													
07-Dec-04		7.0									0.0943U													
13-Dec-04		7.0									0.0637J													
20-Dec-04	9,100	7.0	4.0U	27	0.0962U	0.905B	1.0U	1.0U	2.0U	1.17U	0.0962U	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	0.550B	1.66B	66.7	8.35B	2670	--	--
30-Dec-04		7.0									0.0952U													
03-Jan-05		7.0									0.0952U													
10-Jan-05		7.0									0.114B													
18-Jan-05	10,800B	7.0	--	--	0.120	0.923B	--	--	--	2.65U	0.0595JB	9.52U	5.0U	0.5U	--	--	--	0.454B	--	--	--	--	--	--
25-Jan-05		7.0									0.049J													
02-Feb-05		7.0									0.074J													
08-Feb-05		7.0									0.039J													
15-Feb-05		7.0									0.051J													
28-Feb-05	--	7.0	--	--	0.096U	0.67B	--	--	--	0.43U	0.035J	4.7U	0.94U	0.5U	--	--	--	14	--	--	--	--	--	--
08-Mar-05	--	7.0	--	--	--	--	--	--	--	--	0.033J	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Mar-05		7.0									0.11U													
22-Mar-05	3,500	7.0	5.0U	22	0.094U	0.37B	1.0U	1.0U	2.0U	1.4U	0.11U	4.7U	0.93	0.5U	1.0U	1.0U	1.0U	1.0U	7.4B	44	50U	2,400	ND	ND
30-Mar-05		7.0									0.11U													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
05-Apr-05		7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--
06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

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27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06		7.0	--	--	0.098U	0.81B	--	--	--	--	0.11U	4.9U	0.97U	--	--	--	--	--	--	--	--	--	--	--
25-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Feb-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
07-Feb-06	--	7.0	--	--	0.097U	0.67B	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
15-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
23-Mar-06	9,900	6.5	5.0U	23	0.035J	0.68B	1.0U	1.0U	1.0U	0.32U	0.049J	4.7U	0.93U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	34	50U	2,300	ND	ND
30-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
06-Apr-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
04-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
11-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.8U	0.95U	--	--	--	--	--	--	--	--	--	--	--
08-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-06	6,000	6.5	5.0U	25	0.093U	0.43B	1.0U	1.0U	1.0U	0.87U	0.03J	4.8U	0.88J	0.50U	5.0U	5.0U	5.0U	3.0	4.3B	52	130	2,300	--	--
21-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-06	--	6.5	--	--	--	--	--	--	--	--	0.093U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Jul-06	--	6.5	--	--	0.096U	0.61B	--	--	--	--	0.092U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
27Jul-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
03-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.095U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
24-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.095U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Sept-06	4,100	6.5	5.0U	20	0.018U	0.89B	1.0U	1.0U	1.0U	1.6U	0.31	4.5U	0.91U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	39	50	2,000	--	--
05-Oct-06	--	6.5	--	--	--	--	--	--	--	--	0.094U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Nov-06	--	6.5	--	--	--	--	--	--	--	--	0.098U	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Nov-06	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)

Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
– = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit

RAC2 TECHNICAL STATUS REPORT

November 25, 2006 to December 29, 2006

WORK ASSIGNMENT NUMBER:	004-LRLR-05WE
SITE NAME:	Penta Wood Products-OU1, WI
ACTIVITY:	Long-Term Response Action
CH2M HILL JOB NUMBER:	344511
PREPARED BY:	Bill Andrae/MKE, Site Manager
PERIOD ENDING:	December 29, 2006

COPIES:

RPM:	Tom Williams, USEPA, Region 5
PM:	Isaac H. Johnson, CH2M HILL, Milwaukee, WI
RTL:	Phil Smith, CH2M HILL, Milwaukee, WI
WDNR:	Bill Schultz, WDNR, Rhinelander, WI
WDNR:	Dave Hantz, WDNR, Madison, WI
WDNR:	Pete Prusak, WDNR, Cumberland, WI

1. Progress Made This Reporting Period

Task A (PP):

- Performed routine monthly project management activities.
- Completed work on the procurement of key subcontracts.

Task B (PJ):

- Continued operation of the system under this task.
- Treated and discharged an estimated 1.82 million gallons (MG) of groundwater during the reporting period. To date, a total of 52.36 MG of water have been treated. An estimated 604 gallons of light nonaqueous phase liquid (LNAPL) were recovered bringing the total recovered volume of LNAPL since March 2004 to approximately 19,639 gallons.
- Performed carbon changeout on December 19. The system was restarted on December 21.
- Provided advanced notification to USEPA on December 6, about the subcontract award for carbon changeout services.
- Summarized the status of recommendations presented in the Remediation System Evaluation and are presented in a table located at the end of this document.
- Summarized he results of the Wisconsin Pollutant Discharge Eliminations System (WPDES) for pentachlorophenol (PCP) sampling which are presented in the chart located at the end of this document. There were no exceedances of the PCP target discharge limit of 0.1 micrograms per liter (µg/L).

Task C (CV):

Preparation of the annual report was initiated. As of December 31, CH2M HILL still has not received all the validated data from USEPA.

Summary of Project Status						
Task No./ Code	Planned Start	Actual Start	Planned Completion	Actual Completion	Percent Complete	Schedule Variance
A (PP)	07/01/06	07/01/06	03/14/11		15	0 days
B (PJ)	07/29/06	07/29/06	03/14/11		15	0 days
C (CV)	07/29/06	07/29/06	03/14/11		7	0 days
D (PC)	07/29/06	07/29/06	03/14/11		0	0 days
E (CO)	03/01/11		03/14/11		0	0 days

2. **Problems Resolved**

None.

3. **Problem Areas and Recommended Solutions**

None.

4. **Deliverables Submitted**

None.

5. **Activities Planned Next Reporting Period**

Task A (PP): CH2M HILL plans to perform monthly project management.

Task B (PJ): CH2M HILL will continue operation of the system under this task.

The variable frequency drive for the pump in EW-11 will be repaired or replaced.

Task C (CV): CH2M HILL will continue to conduct operational monitoring. Preparation of the annual report will continue. Progress will be based on the rate at which CH2M HILL receives validated data from USEPA.

6. **Key Personnel Changes**

None.

7. **Subcontractor Services**

Electrical Service:	Northwestern WI Electric Co.
Telephone:	Siren Telephone Company
Septic Service:	A-1 Septic Service
Nonhazardous Waste Disposal:	Allied Waste Services
Polymer:	US Water Services
Propane Tank and Gas:	Larry's LP, Inc.
Contaminated Media Removal:	Siemens Water Technologies, Inc.
Hazardous Waste Disposal:	North Shore Environmental

Treatment System Chemicals:	Glacier Pure, Inc.
Well Pump Inspection and Replacement:	WDC Exploration and Wells
Road Maintenance, Erosion Control, and Repair:	Brust Excavating
Carbon Changeout Services	Siemens Water Technologies

8. **Travel**

None.

9. **Laboratories**

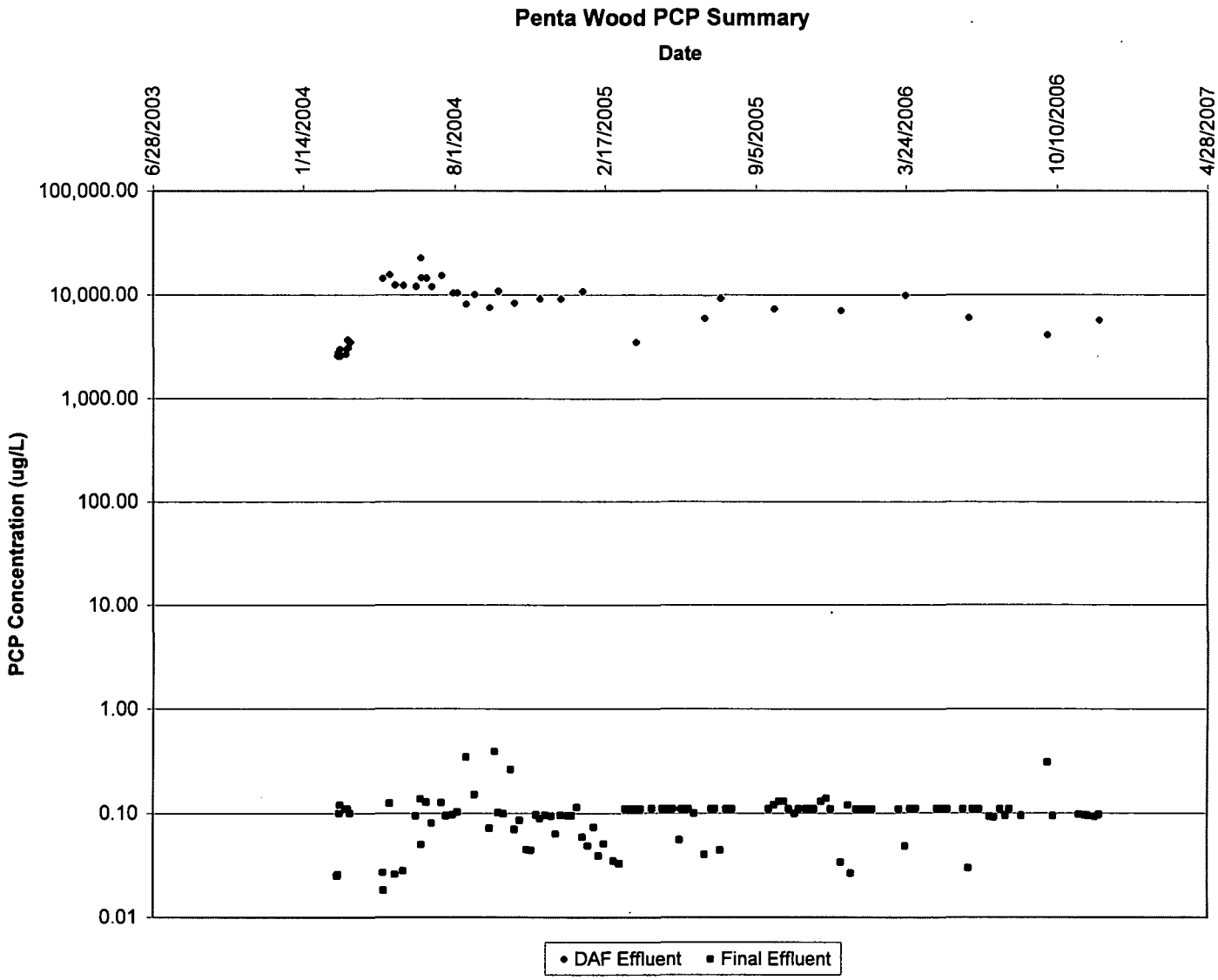
The 2006–2008 analytical services subcontract has been awarded to STL of Chicago, Illinois. They are a Wisconsin-certified laboratory.

10. **Project Performance**

The carbon beds are continuing to effectively adsorb dissolved PCP. Concentrations of PCP in the effluent are consistently below the target concentration of 0.1 µg/L.

REMEDIATION SYSTEM EVALUATION RECOMMENDATION STATUS

Recommendation	Status
Follow Water Quality Trends in Monitoring Wells to Determine if the Plume is Migrating	CH2M HILL will continue to evaluate the PCP data for MW-13 and the site to determine if plume migration is expanding and if additional monitoring sites may be needed. If continued increases are observed in MW-13, installation of a monitoring well to the east, in the direction of two residences, may be considered.
Provide More Accurate Prediction of Consumables and Disposal Costs	The budget for the new LTRA Work Plan will be more accurate because of the availability of actual costs.
Consider Modifying Management of GAC Units	CH2M HILL has requested preliminary cost information for the installation of backwash piping for the 10,000 pound units. The backwash pump installed in April 2005 is capable of supplying the necessary flow rate to backwash the larger GAC units.
Eliminate Redundant or Unnecessary Laboratory Analysis	Historical metals data were reviewed to verify elimination of total metals from the annual sampling of the monitoring wells and will not affect data evaluation. As instructed by USEPA, CH2M HILL will eliminate the total metals analysis from the groundwater sampling events. As instructed by USEPA, CH2M HILL will not eliminate the spring sampling event until sufficient data exists in order to fully evaluate the contaminant plume.
Savings From the Use of Dedicated Pumps in Monitoring Wells	CH2M HILL is reducing the field staff for the 2006 spring sampling event and will evaluate the overall level of effort versus previous sampling events. CH2M HILL will also evaluate the potential for the plant operator to serve as a field team member to further reduce travel costs.
Investigate Possibility of Declassifying Waste	CH2M HILL investigated the possibility of declassifying the waste and determined that this action is not feasible due to the continued presence of LNAPL in the ground considered to be a listed hazardous waste.
Decrease Project Management/ Reporting Costs	CH2M HILL expects project management costs to decrease during the new LTRA work assignment. Data management costs may remain high due to the volume of analytical data generated for the site and the level of effort associated with meeting USEPA reporting requirements.
Develop Tracking of Routine and Non-Routine Costs	For the new LTRA work assignment, CH2M HILL will develop a tracking system to assist in analyzing routine and non-routine maintenance activities, the associated costs, and possible ways to reduce the costs.
Evaluate Potential to Reduce Ground Water Extraction without Substantially Affecting LNAPL Recovery	As part of the data evaluation activities for the new LTRA work assignment, CH2M HILL will continue to evaluate LNAPL recovery and dissolved plume containment to determine the potential for reduced groundwater pumping.
Adjust pH to 6.5 instead of 7.0	As instructed by USEPA, CH2M HILL has implemented this recommendation.
Transition From Ground Water Extraction and LNAPL Recovery System To Bioventing System and Intrinsic Remediation	As part of the new LTRA work assignment, CH2M HILL will review and reevaluate subsurface conditions and the potential impacts of operating the bioventing system concurrently with the groundwater and LNAPL extraction systems and present a recommendation to USEPA for review and possible implementation.


Penta Wood PCP Summary
Date
6/28/2003
1/14/2004
8/1/2004
2/17/2005
9/5/2005
3/24/2006
10/10/2006
4/28/2007
100,000.00
10,000.00
1,000.00
100.00
10.00
1.00
0.10
0.01
PCP Concentration (ug/L)
DAF Effluent
Final Effluent

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Jun-04	12,000B	7.0	2.13U	29	0.10U	0.775B	5.0U	5.0U	10.0U	1.78U	0.0943U	5.0U	5.0U	0.5U	5.0U	5.0U	5.0U	0.967B	4.92	111	412	2,230	--	--
16-Jun-04		7.0									0.137													
17-Jun-04		7.0									0.050U													
23-Jun-04		7.0									*NA													
24-Jun-04		7.0									0.127													
01-Jul-04		7.0									0.081JB													
14-Jul-04		7.0									0.126													
20-Jul-04	--	7.0	2.13U	30B	0.10U	1.12	1.0U	1.0U	2.0U	1.78U	0.0952U	4.85U	1.0U	0.5U	1.0U	1.0U	1.0U	0.843B	3.49	79.7	5.48B	2,460	--	--
29-Jul-04		7.0									0.0971U													
04-Aug-04		7.0									0.103													
16-Aug-04		7.0									0.348													
27-Aug-04	--	7.0	4.0U	--	0.10U	0.789B	1.0U	1.0U	2.0U	1.58U	0.151	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	2.19	3.75	98.1	--	--	--	--
16-Sep-04		7.0									0.0724JB													
23-Sep-04		7.0									0.393B													
28-Sep-04	10,900B	7.0	4.0U	28	0.10U	0.811B	1.0U	1.0U	2.0U	2.17U	0.102B	9.43U	1.0U	0.5U	1.0U	1.0U	1.0U	1.0U	5.51	95.5	36.8B	2,470	--	--
05-Oct-04		7.0									0.0990													
14-Oct-04		7.0									0.265B													
19-Oct-04	8,310B	7.0	--	--	0.143B	1.01	--	--	--	0.97U	0.0702JB	9.52U	1.0U	0.5U	--	--	--	0.500B	--	--	--	--	--	--
26-Oct-04		7.0									0.0861J													
04-Nov-04		7.0									0.0447J													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
10-Nov-04		7.0									0.0442J													
17-Nov-04		7.0									0.0971U													
22-Nov-04	9,140	7.0	--	--	0.0935U	0.787JB	--	--	--	0.82U	0.0900J	9.43U	1.0U	0.5U	--	--	--	0.727B	--	--	--	--	--	--
29-Nov-04		7.0									0.0962U													
07-Dec-04		7.0									0.0943U													
13-Dec-04		7.0									0.0637J													
20-Dec-04	9,100	7.0	4.0U	27	0.0962U	0.905B	1.0U	1.0U	2.0U	1.17U	0.0962U	9.62U	1.0U	0.5U	1.0U	1.0U	1.0U	0.550B	1.66B	66.7	8.35B	2670	--	--
30-Dec-04		7.0									0.0952U													
03-Jan-05		7.0									0.0952U													
10-Jan-05		7.0									0.114B													
18-Jan-05	10,800B	7.0	--	--	0.120	0.923B	--	--	--	2.65U	0.0595JB	9.52U	5.0U	0.5U	--	--	--	0.454B	--	--	--	--	--	--
25-Jan-05		7.0									0.049J													
02-Feb-05		7.0									0.074J													
08-Feb-05		7.0									0.039J													
15-Feb-05		7.0									0.051J													
28-Feb-05	--	7.0	--	--	0.096U	0.67B	--	--	--	0.43U	0.035J	4.7U	0.94U	0.5U	--	--	--	14	--	--	--	--	--	--
08-Mar-05	--	7.0	--	--	--	--	--	--	--	--	0.033J	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Mar-05		7.0									0.11U													
22-Mar-05	3,500	7.0	5.0U	22	0.094U	0.37B	1.0U	1.0U	2.0U	1.4U	0.11U	4.7U	0.93	0.5U	1.0U	1.0U	1.0U	1.0U	7.4B	44	50U	2,400	ND	ND
30-Mar-05		7.0									0.11U													

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
05-Apr-05		7.0									0.11U													
20-Apr-05	--	7.0	--	--	0.098U	0.69B	--	--	--	--	0.066J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
04-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-May-05	0.11U	7.0	--	--	0.093U	0.63B	--	--	--	1.2U	0.056J	4.8U	0.95U	0.5U	--	--	--	1.0U	--	--	--	--	--	--
01-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-05	--	7.0	--	--	--	--	--	--	--	--	0.10U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-05	5,900	7.0	6.0	29	0.091U	0.66B	1.0U	1.0U	1.0U	2.3U	0.040J	4.8U	0.95U	0.50U	5.0U	5.0U	5.0U	9.1	10U	96	5,500	2,500	--	--
08-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
20-Jul-05	9,200	7.0	--	--	0.093U	0.64B	--	--	--	--	0.044J	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
28-Jul-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
04-Aug-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
22-Sept-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Sept-05	7,300	7.0	2.0B	24	0.095U	0.50B	1.0U	1.0U	1.0U	0.68U	0.12U	4.6U	0.93U	0.5U	5.0U	5.0U	5.0U	1.0U	10U	35	50U	2,100	--	--
06-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
12-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Oct-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
27-Oct-05	--	7.0	--	--	0.093U	0.61B	--	--	--	--	0.099J	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
01-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Nov-05	--	7.0	--	--	0.024J	0.59B	--	--	--	--	0.11U	4.7U	--	--	--	--	--	--	--	--	--	--	--	--
22-Nov-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.13U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.14U	--	--	--	--	--	--	--	--	--	--	--	--	--
14-Dec-05	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Dec-05	7,100	7.0	5.0U	23	0.093U	0.70B	1.0U	1.0U	1.0U	0.33U	0.034J	4.8U	37	0.50U	5.0U	5.0U	5.0U	5.0	2.5B	72	390	3,600	--	--
06-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.12U	--	--	--	--	--	--	--	--	--	--	--	--	--
10-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.027J	--	--	--	--	--	--	--	--	--	--	--	--	--
17-Jan-06		7.0	--	--	0.098U	0.81B	--	--	--	--	0.11U	4.9U	0.97U	--	--	--	--	--	--	--	--	--	--	--
25-Jan-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
01-Feb-06	--	7.0	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
07-Feb-06	--	7.0	--	--	0.097U	0.67B	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
15-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
23-Mar-06	9,900	6.5	5.0U	23	0.035J	0.68B	1.0U	1.0U	1.0U	0.32U	0.049J	4.7U	0.93U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	34	50U	2,300	ND	ND
30-Mar-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
06-Apr-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
04-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)
11-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
18-May-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	4.8U	0.95U	--	--	--	--	--	--	--	--	--	--	--
08-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
15-Jun-06	6,000	6.5	5.0U	25	0.093U	0.43B	1.0U	1.0U	1.0U	0.87U	0.03J	4.8U	0.88J	0.50U	5.0U	5.0U	5.0U	3.0	4.3B	52	130	2,300	--	--
21-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Jun-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
13-Jul-06	--	6.5	--	--	--	--	--	--	--	--	0.093U	--	--	--	--	--	--	--	--	--	--	--	--	--
19-Jul-06	--	6.5	--	--	0.096U	0.61B	--	--	--	--	0.092U	4.7U	0.93U	--	--	--	--	--	--	--	--	--	--	--
27Jul-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
03-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.095U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.11U	--	--	--	--	--	--	--	--	--	--	--	--	--
24-Aug-06	--	6.5	--	--	--	--	--	--	--	--	0.095U	--	--	--	--	--	--	--	--	--	--	--	--	--
27-Sept-06	4,100	6.5	5.0U	20	0.018U	0.89B	1.0U	1.0U	1.0U	1.6U	0.31	4.5U	0.91U	0.50U	5.0U	5.0U	5.0U	1.0U	10U	39	50	2,000	--	--
05-Oct-06	--	6.5	--	--	--	--	--	--	--	--	0.094U	--	--	--	--	--	--	--	--	--	--	--	--	--
08-Nov-06	--	6.5	--	--	--	--	--	--	--	--	0.098U	--	--	--	--	--	--	--	--	--	--	--	--	--
16-Nov-06	--	6.5	--	--	0.095U	1.4	--	--	--	--	0.096U	--	0.95U	--	--	--	--	--	--	--	--	--	--	--
20-Nov-06	--	6.5	--	--	--	--	--	--	--	--	0.095U	--	--	--	--	--	--	--	--	--	--	--	--	--
29-Nov-06	--	6.5	--	--	--	--	--	--	--	--	0.093U	--	--	--	--	--	--	--	--	--	--	--	--	--
05-Dec-06	5,700	6.5	5.0U	22	0.096U	0.91B	1.0U	1.0U	1.0U	0.56U	0.097U	4.7U	0.93U	0.50	5.0U	5.0U	5.0U	1.0U	10U	39	50U	2,300		
27-Dec-06	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR	*NR

WPDES SAMPLING SUMMARY

Date	Pentachlorophenol (µg/L) Influent	pH Field	Total Suspended Solids (mg/L)	Chloride (mg/L)	Diesel Range Organics (mg/L)	Total Organic Carbon (mg/L)	1,3,5-Trimethylbenzene (µg/L)	1,2,4-Trimethylbenzene (µg/L)	Total Trimethylbenzene (µg/L)	Dioxin (2,3,7,8 TCDD; pg/L; 3.0 pg/L monthly average limit)	Pentachlorophenol (µg/L; 0.1 µg/L monthly average limit)	Phenol (µg/L)	Naphthalene (µg/L; 8.0 µg/L monthly average limit)	Benzene (µg/L; 0.5 µg/L monthly average limit)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylene (µg/L)	Arsenic, Total Recoverable (ug/L; 5.0 µg/L monthly average limit)	Copper, Total Recoverable (µg/L)	Zinc, Total Recoverable (µg/L)	Iron, Total Recoverable (µg/L)	Manganese, Total Recoverable (µg/L)	Acid Extractables	Dioxins & Furans (all cogeners)

Notes:
*NA = Sample analysis was on hold and cancelled based on the results of the quick turnaround time samples.
*NR = Sample results are not yet available from the laboratory.
*ND = Compound not detected in sample.
-- = Not sampled.

mg/L = milligrams per liter
µg/L = micrograms per liter

Qualifiers:
B = Analyte found in the method blank
J = Estimated value
U = Analyte was not detected at or above the stated limit