Richard, Philip E - DNR

8 10/6/14 (991

Ree, Timothy <tree@craworld.com>

From: Sent: To:

Friday, October 03, 2014 10:28 AM

Richard, Philip E - DNR

Subject:

RE: Penta Wood - WPDES Compliance Sampling 9/23/2014 ~COR-086165~

Attachments:

Lab Report-240-42299-1-086165-01-07-2014-10-03.pdf

Phil,

Please find attached the revised lab report for the 9/23/2014 compliance sample. The lab re-analyzed the sample at a lower dilution. PCP was not detected at the lower reporting limit (0.095 ug/L), which is also less than the discharge limit (0.1 ug/L). The data indicates the system is treating and discharging water in accordance with the permit requirements.

Regards,

Tim

From: Ree, Timothy

Sent: Thursday, October 02, 2014 1:14 PM

To: 'Richard, Philip E - DNR'

Subject: RE: Penta Wood - WPDES Compliance Sampling 9/23/2014 ~COR-086165~

OK

From: Richard, Philip E - DNR [mailto:Philip.Richard@wisconsin.gov]

Sent: Thursday, October 02, 2014 1:13 PM

To: Ree, Timothy

Subject: RE: Penta Wood - WPDES Compliance Sampling 9/23/2014 ~COR-086165~

I agree, let's wait and see what the re-run shows.

Philip E. Richard

Hydrogeologist

Wisconsin Department of Natural Resources

Phone: 715 762 1352 Fax: 715 762 4348

philip.richard@wisconsin.gov

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From: Ree, Timothy [mailto:tree@craworld.com] Sent: Thursday, October 02, 2014 1:05 PM

To: Richard, Philip E - DNR

Subject: RE: Penta Wood - WPDES Compliance Sampling 9/23/2014 ~COR-086165~

Phil,

Since the reporting limit (0.48 ug/L) was greater than the permit discharge limit (0.1 ug/L), the lab is going to rerun the 9/23/2014 compliance sample at a lower dilution and should be able to provide results by tomorrow. Since PCP was not detected above the reporting limit (0.48 ug/L) or detected at an estimated concentration between the method detection limit (0.074 ug/L) and the reporting limit (0.48 ug/L), we should not be required to report a possible noncompliance of the discharge criteria (0.1 ug/L). Article 3.2.1 of the permit requires that "the Permittee shall report ... noncompliance by a telephone call to the Department's regional office (Spooner) within 24 hours after becoming aware of the noncompliance."

Again, I do not think the permit requires us to notify the Department, but let me know if you would like me to call Kathy Bartilson to explain this issue while we wait for re-run analytical results.

Thanks, Tim

From: Ree, Timothy

Sent: Wednesday, October 01, 2014 1:34 PM

To: 'Richard, Philip E - DNR' **Cc:** Frehner, Ron; Storlie, Pete

Subject: Penta Wood - WPDES Compliance Sampling 9/23/2014 ~COR-086165~

Phil,

Please find attached a copy of the laboratory report for the WPDES compliance samples collected at the Penta Wood site on 9/23/2014. The data indicates the system is treating and discharging water in accordance with the permit requirements.

Regards,

Tim Ree

Conestoga-Rovers & Associates (CRA)

1801 Old Highway 8 NW, Suite 114 St Paul, MN 55112

Phone: 651.639.0913

Direct: 651.639-0439 (ext. 338)

Cell: 651.592.7697 Fax: 651.639.0923

Email: tree@CRAworld.com
www.CRAworld.com

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TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

TestAmerica Laboratories, Inc.

TestAmerica Canton 4101 Shuffel Street NW North Canton, OH 44720 Tel: (330)497-9396

TestAmerica Job ID: 240-42299-1

Client Project/Site: 86165-01, Penta Wood

Revision: 1

For:

Conestoga-Rovers & Associates, Inc. 1801 Old Highway 8 NW Suite 114 St. Paul, Minnesota 55112

Attn: Mr. Grant Anderson

Authorized for release by: 10/3/2014 10:49:42 AM

Denise Heckler, Project Manager II (330)966-9477

enuse DHeckler

denise.heckler@testamericainc.com

intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

This report has been electronically signed and authorized by the signatory. Electronic signature is

TestAmerica Job ID: 240-42299-1

Client: Conestoga-Rovers & Associates, Inc. Project/Site: 86165-01, Penta Wood

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Definitions/Glossary

Client: Conestoga-Rovers & Associates, Inc.

Qualifier Description

Indicates the analyte was analyzed for but not detected.

Project/Site: 86165-01, Penta Wood

Qualifiers GC Semi VOA Qualifier

TestAmerica Job ID: 240-42299-1











Glossary		
Abbreviation	These commonly used abbreviations may or may not be present in this report.	
n	Listed under the "D" column to designate that the result is reported on a dry weight basis	
%R	Percent Recovery	
CFL	Contains Free Liquid	
CNF	Contains no Free Liquid	
DER	Duplicate error ratio (normalized absolute difference)	
Dil Fac	Dilution Factor	
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample	
DLC	Decision level concentration	
MDA	Minimum detectable activity	
EDL	Estimated Detection Limit	
MDC	Minimum detectable concentration	
MDL	Method Detection Limit	
ML	Minimum Level (Dioxin)	
NC	Not Calculated	
ND	Not detected at the reporting limit (or MDL or EDL if shown)	
PQL	Practical Quantitation Limit	
QC	Quality Control	
RER	Relative error ratio	
RL	Reporting Limit or Requested Limit (Radiochemistry)	
RPD	Relative Percent Difference, a measure of the relative difference between two points	
TEF	Toxicity Equivalent Factor (Dioxin)	
TEQ	Toxicity Equivalent Quotient (Dioxin)	

Case Narrative

Client: Conestoga-Rovers & Associates, Inc. Project/Site: 86165-01, Penta Wood

TestAmerica Job ID: 240-42299-1

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Job ID: 240-42299-1

Laboratory: TestAmerica Canton

Narrative

CASE NARRATIVE

Client: Conestoga-Rovers & Associates, Inc.

Project: 86165-01, Penta Wood

Report Number: 240-42299-1

With the exceptions noted as flags or footnotes, standard analytical protocols were followed in the analysis of the samples and no problems were encountered or anomalies observed. In addition all laboratory quality control samples were within established control limits, with any exceptions noted below. Each sample was analyzed to achieve the lowest possible reporting limit within the constraints of the method. In some cases, due to interference or analytes present at high concentrations, samples were diluted. For diluted samples, the reporting limits are adjusted relative to the dilution required.

TestAmerica Canton attests to the validity of the laboratory data generated by TestAmerica facilities reported herein. All analyses performed by TestAmerica facilities were done using established laboratory SOPs that incorporate QA/QC procedures described in the application methods. TestAmerica's operations groups have reviewed the data for compliance with the laboratory QA/QC plan, and data have been found to be compliant with laboratory protocols unless otherwise noted below.

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory.

Calculations are performed before rounding to avoid round-off errors in calculated results.

All holding times were met and proper preservation noted for the methods performed on these samples, unless otherwise detailed in the individual sections below.

All solid sample results are reported on an "as received" basis unless otherwise indicated by the presence of a % solids value in the method header.

This laboratory report is confidential and is intended for the sole use of TestAmerica and its client.

A revised report was provided on October 3, 2014. The sample was reanalyzed at a lower dilution.

RECEIPT

The samples were received on 09/24/2014; the samples arrived in good condition, properly preserved and on ice. The temperature of the coolers at receipt was 4.2 C.

CHLORINATED HERBICIDES

Sample W-140923-PS-WE (240-42299-1) was analyzed for chlorinated herbicides in accordance with EPA SW-846 Method 8151A. The samples were prepared on 09/26/2014 and analyzed on 10/02/2014.

Surrogates are added during the extraction process prior to dilution. When the sample dilution is 5X or greater, surrogate recoveries are diluted out and no corrective action is required.

No analytical or quality issues were noted, other than those described above or in the Definitions/Glossary page.

Method Summary

Client: Conestoga-Rovers & Associates, Inc. Project/Site: 86165-01, Penta Wood

TestAmerica Job ID: 240-42299-1

Method	Method Description	Protocol	Laboratory
8151A	Herbicides (GC)	SW846	TAL PIT

Protocol References:

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

TAL PIT = TestAmerica Pittsburgh, 301 Alpha Drive, RIDC Park, Pittsburgh, PA 15238, TEL (412)963-7058

Sample Summary

Matrix

Water

Client: Conestoga-Rovers & Associates, Inc. Project/Site: 86165-01, Penta Wood

Lab Sample ID

240-42299-1

Client Sample ID

W-140923-PS-WE

TestAmerica Job ID: 240-42299-1

Collected	Received	

09/23/14 09:00 09/24/14 09:25

Detection Summary

Client: Conestoga-Rovers & Associates, Inc. Project/Site: 86165-01, Penta Wood

TestAmerica Job ID: 240-42299-1

Lab Sample ID: 240-42299-1

Client Sample ID: W-140923-PS-WE

No Detections.

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Client Sample Results

Client: Conestoga-Rovers & Associates, Inc. Project/Site: 86165-01, Penta Wood

TestAmerica Job ID: 240-42299-1

Client Sample ID: W-140923-PS-WE

Lab Sample ID: 240-42299-1

Matrix: Water

Date Collected: 09/23/14 09:00 Date Received: 09/24/14 09:25

Method: 8151A - Herbicides (G	C)
-------------------------------	----

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Pentachlorophenol	0.095	U	0.095	0.015	ug/L		09/26/14 16:00	10/02/14 18:38	4

%Recovery Qualifier Limits Surrogate 2,4-Dichlorophenylacetic acid 84 32 - 140

Prepared Analyzed Dil Fac 09/26/14 16:00 10/02/14 18:38

Surrogate Summary

Client: Conestoga-Rovers & Associates, Inc.

Project/Site: 86165-01, Penta Wood

TestAmerica Job ID: 240-42299-1

Method: 8151A - Herbicides (GC)

Matrix: Water

Prep Type: Total/NA

				Percent Surrogate Recovery (Acceptance Limits)
		DCPA1	DCPA2	
_ab Sample ID	Client Sample ID	(32-140)	(32-140)	
240-42299-1	W-140923-PS-WE	84	83	
LCS 180-119460/2-A	Lab Control Sample	107	121	
MB 180-119460/1-A	Method Blank	102	97	
Surrogate Legend				

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QC Sample Results

Client: Conestoga-Rovers & Associates, Inc. Project/Site: 86165-01, Penta Wood

Method: 8151A - Herbicides (GC)

TestAmerica Job ID: 240-42299-1

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Lab Sample ID: MB 180-119460/1- Matrix: Water	A										Client Sa	mple ID: Me Prep Typ	thod Blank e: Total/NA
Analysis Batch: 120108												Prep Bat	ch: 119460
	- 1	MB N	МВ										
Analyte	Res	ult C	Qualifier	RL		MDL	Unit		D	P	repared	Analyzed	Dil Fac
Pentachlorophenol	0.	.10 L	J	0.10	(0.016	ug/L			09/2	6/14 16:00	10/02/14 18:	18 4
	1	мв м	ИВ										
Surrogate	%Recove	ery G	Qualifier	Limits						P	repared	Analyzed	Dil Fac
2,4-Dichlorophenylacetic acid		102		32 - 140						09/2	6/14 16:00	10/02/14 18:	18 4
		.02		32 - 140					C	lient	Sample	ID: Lab Cont	rol Sample
Lab Sample ID: LCS 180-119460/2 Matrix: Water Analysis Batch: 119855				Spike	LCS	LCS			C	lient	Sample	Prep Typ	e: Total/NA
Lab Sample ID: LCS 180-119460/2 Matrix: Water					LCS Result			Unit	C	lient	Sample %Rec	Prep Typ Prep Bat	e: Total/NA
Lab Sample ID: LCS 180-119460/2 Matrix: Water Analysis Batch: 119855				Spike				Unit ug/L	C		•	Prep Typ Prep Bat %Rec.	e: Total/NA
Lab Sample ID: LCS 180-119460/2 Matrix: Water Analysis Batch: 119855		. :		Spike Added	Result			DEDOCESTON 1	C		%Rec	Prep Type Prep Bat %Rec. Limits	e: Total/NA
Lab Sample ID: LCS 180-119460/2 Matrix: Water Analysis Batch: 119855 Analyte Pentachlorophenol	-A	LCS	ier	Spike Added	Result			DEDOCESTON 1	C		%Rec	Prep Type Prep Bat %Rec. Limits	rol Sample e: Total/NA ich: 119460

Page 10 of 17

QC Association Summary

Client: Conestoga-Rovers & Associates, Inc. Project/Site: 86165-01, Penta Wood

TestAmerica Job ID: 240-42299-1

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Prep Batch: 119460

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-42299-1	W-140923-PS-WE	Total/NA	Water	8151A	
LCS 180-119460/2-A	Lab Control Sample	Total/NA	Water	8151A	
MB 180-119460/1-A	Method Blank	Total/NA	Water	8151A	

Analysis Batch: 119855

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
LCS 180-119460/2-A	Lab Control Sample	Total/NA	Water	8151A	119460

Analysis Batch: 120108

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-42299-1	W-140923-PS-WE	Total/NA	Water	8151A	119460
MB 180-119460/1-A	Method Blank	Total/NA	Water	8151A	119460

Lab Chronicle

Client: Conestoga-Rovers & Associates, Inc.

Project/Site: 86165-01, Penta Wood

TestAmerica Job ID: 240-42299-1

Client Sample ID: W-140923-PS-WE

Date Collected: 09/23/14 09:00 Date Received: 09/24/14 09:25

Laboratory References:

Lab Sample ID: 240-42299-1

Matrix: Water

	Batch	Batch		Dilution	Batch	Prepared		
Prep Type	Type	Method	Run	Factor	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	8151A			119460	09/26/14 16:00	CBY	TAL PIT
Total/NA	Analysis	8151A		4	120108	10/02/14 18:38	JMO	TAL PIT

TAL PIT = TestAmerica Pittsburgh, 301 Alpha Drive, RIDC Park, Pittsburgh, PA 15238, TEL (412)963-7058

TestAmerica Canton

Certification Summary

Client: Conestoga-Rovers & Associates, Inc. Project/Site: 86165-01, Penta Wood

TestAmerica Job ID: 240-42299-1

7

Laboratory: TestAmerica Canton

The certifications listed below are applicable to this report.

Authority	Program	EPA Region	Certification ID	Expiration Date	
Wisconsin	State Program	5	999518190	08-31-15	

Laboratory: TestAmerica Pittsburgh

All certifications held by this laboratory are listed. Not all certifications are applicable to this report.

Authority	Program	EPA Region	Certification ID	Expiration Date
Arkansas DEQ	State Program	6	88-0690	06-27-15
California	State Program	9	2891	03-31-15
Connecticut	State Program	1	PH-0688	09-30-14 *
Florida	NELAP	4	E871008	06-30-15
Illinois	NELAP	5	002602	06-30-15
Kansas	NELAP	7	E-10350	01-31-15
Louisiana	NELAP	6	04041	06-30-15
New Hampshire	NELAP	1	203011	04-04-15
New Jersey	NELAP	2	PA005	06-30-15
New York	NELAP	2	11182	03-31-15
North Carolina (WW/SW)	State Program	4	434	12-31-14
Pennsylvania	NELAP	3	02-00416	04-30-15
South Carolina	State Program	4	89014	04-30-15
Texas	NELAP	6	T104704528	03-31-15
US Fish & Wildlife	Federal		LE94312A-1	11-30-14
USDA	Federal		P330-10-00139	05-23-16
Jtah	NELAP	8	STLP	05-31-15
√irginia	NELAP	3	460189	09-14-15
West Virginia DEP	State Program	3	142	01-31-15

HOLD IN

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^{*} Certification renewal pending - certification considered valid.

TestAmerica Canton



TestAmerica Laboratories, Inc.

CHAIN OF CUSTODY AND RECEIVING DOCUMENTS

TestAmerica Chain of **Custody Record** THE LEADER IN ENVIRONMENTAL TESTING Drinking Water? Yes ☐ No ☐ TAL-4124 (1007) Chain of Custody Number 258283 Project Manager Lab Number Telephone Number (Area Code)/Fax Number Page Analysis (Attach list if Site Contact Grant more space is needed) Project Name and Location (State) Carrier/Waybill Number Special Instructions/ Conditions of Receipt Containers & Matrix Preservatives Sample I.D. No. and Description Date Time Sed. (Containers for each sample may be combined on one line) Page 15 9 Possible Hazard Identification Sample Disposal (A fee may be assessed if samples are retained Non-Hazard 🔲 Flammable 🔲 Skin Irritant 🔲 Poison B 🔲 Unknown 🔲 Return To Client Disposal By Lab Archive For _ Months longer than 1 month) QC Requirements (Specify) Turn Around Time Required 7 Days 14 Days 21 Days Other 24 Hours 48 Hours 1. Relinquished By 2. Relinguished By 10/3/2014 Date Time Received By 3. Relinquished By Comments DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

	#: 42299
Canton Facility	
Client Site Name	Cooler unpacketby:
Cooler Received on 124/14 Opened on 9/24/14	Makola Chulle
	Other
TestAmerica Cooler # Foam Box Client Cooler Box Other	
Packing material used: Bubble Wrap Foam Plastic Bag None Other	and the state of t
COOLANT: Werice Blue Ice Dry Ice Water None	
Cooler temperature upon receipt	
IR GUN# A (CF +2 °C) Observed Cooler Temp. °C Corrected Cooler Tem	
IR GUN# 4 (CF -2 °C) Observed Cooler Temp. °C Corrected Cooler Tem	A
R GUN# 5 (CF 0 °C) Observed Cooler Temp. °C Corrected Cooler Tem	
IR GUN# 8 (CF 0 °C) Observed Cooler Temp. 1998. Corrected Gooler Tem	
2. Were custody seals on the outside of the cooler(s)? If Yes Quantity Yes -Were custody seals on the outside of the cooler(s) signed & dated? Yes	No_NA
-Were custody seals on the outside of the cooler(s) signed & dated? -Were custody seals on the bottle(s)? Yes	NOTA
3. Shippers' packing slip attached to the cooler(s)?	No
4. Did custody papers accompany the sample(s)?	No
5. Were the custody papers relinquished & signed in the appropriate place?	No
o, maio and outside, per manifestation of the period of th	
6. Did all bottles arrive in good condition (Unbroken)?	No
1. 001	No
	No
2. 0	No No
10. Hold datapate(o) at the option	No NA pH Strip Lo# HC412469
11. Were VOAs on the COC?	((()
	No MA
13. Was a trip blank present in the cooler(s)?	(No)
Contacted PM Date by via Verbal V	oice Mail Other
Concerning	
	C 1
14. CHAIN OF CUSTODY & SAMPLE DISCREPANCIES	Samples processed by:
15. SAMPLE CONDITION	ing time had expired
Sample(s) were received after the recommended hold Sample(s) were received	d in a broken container.
	an ordinary (1 total)
16. SAMPLE PRESERVATION	
Sample(s) were fu	rther preserved in the laboratory.
Sample(s) were fu Time preserved: Preservative(s) added/Lot number(s):	

Login Sample Receipt Checklist

Client: Conestoga-Rovers & Associates, Inc.

Job Number: 240-42299-1

Login Number: 42299 List Number: 2

Creator: Watson, Debbie

List Source: TestAmerica Pittsburgh List Creation: 09/25/14 04:22 PM

Question	Answer	Comment
Radioactivity wasn't checked or is = background as measured by a survey meter.</td <td>True</td> <td></td>	True	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	

N/A

Residual Chlorine Checked.

Richard, Philip E - DNR

Px 02/14 10/2/14 Pec 10/1/14 (99)

From:

Ree, Timothy <tree@craworld.com>

Sent:

Wednesday, October 01, 2014 1:33 PM

To:

Richard, Philip E - DNR

Cc:

Frehner, Ron; Storlie, Pete

Subject:

Penta Wood - WPDES Compliance Sampling 9/23/2014 ~COR-086165~

Attachments:

Lab Report-240-42299-1-086165-01-07-2014-10-01.pdf

Phil,

Please find attached a copy of the laboratory report for the WPDES compliance samples collected at the Penta Wood site on 9/23/2014. The data indicates the system is treating and discharging water in accordance with the permit requirements.

Regards,

Tim Ree

Conestoga-Rovers & Associates (CRA)

1801 Old Highway 8 NW, Suite 114 St Paul, MN 55112

Phone: 651.639.0913

Direct: 651.639-0439 (ext. 338)

Cell: 651.592.7697 Fax: 651.639.0923

Email: tree@CRAworld.com

www.CRAworld.com

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mode LOD
High

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<u>TestAmerica</u>

THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

TestAmerica Laboratories, Inc.

TestAmerica Canton 4101 Shuffel Street NW North Canton, OH 44720 Tel: (330)497-9396

TestAmerica Job ID: 240-42299-1

Client Project/Site: 86165-01, Penta Woods

For

Conestoga-Rovers & Associates, Inc. 1801 Old Highway 8 NW Suite 114 St. Paul, Minnesota 55112

Attn: Mr. Grant Anderson

Authorized for release by: 10/1/2014 1:36:06 PM

Denise Heckler, Project Manager II (330)966-9477

lenuse DHeckler

denise.heckler@testamericainc.com

This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

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