

Richard, Philip E - DNR

PH on
BDRS
(43)
12/4/14

From: Ree, Timothy <tree@craworld.com>
Sent: Wednesday, December 03, 2014 2:54 PM
To: Richard, Philip E - DNR
Cc: Frehner, Ron; Storlie, Pete; Endsley, Erin A - DNR
Subject: Penta Wood - WPDES Compliance Sampling 11/24/2014 ~COR-086165~
Attachments: Lab Report-240-44845-1-086165-01-07-2014-12-03.pdf

Phil,

Please find attached a copy of the laboratory report for the WPDES compliance effluent sample collected at the Penta Wood site on 11/24/2014. PCP was detected at a concentration of 0.21 ug/L, which exceeds the permit limit of 0.1 ug/L. Furthermore, the average of the weekly effluent PCP concentrations for the samples collected in November 2014 is 0.145 ug/L, which exceeds the permit limit of 0.1 ug/L. This represents a noncompliance.

Sections 2.2.1.6 and 3.2.1 of the Substantive Requirements of a WPDES Permit require that WDNR's Northern Region (Spooner) be notified within 24 hours of becoming aware of a noncompliance. In addition, Section 3.2.1 of the Permit requires that a written report be submitted to WDNR within 5 days. This written report is due on 12/8/2014. CRA recommends that you notify Kathy Bartilson (WDNR) and Linda Martin (USEPA) of this noncompliance.

Before we provide a draft written report with a corrective action for your review, we have asked the carbon vendor to comment on why the lead carbon unit treats PCP from >2,000 ug/L to approximately 0.5 ug/L but the lag unit does not treat PCP from 0.5 ug/L to <0.1 ug/L. We have summarized all system data and provided to the carbon vendor and asked for a response/recommendation by tomorrow (12/4/2014).

Should you have questions, please do not hesitate to contact me.

Regards,

Tim Ree
Conestoga-Rovers & Associates (CRA)

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

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ANALYTICAL REPORT

TestAmerica Laboratories, Inc.

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

TestAmerica Job ID: 240-44845-1

Client Project/Site: 86165-01-07, Penta Wood

For:

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

Attn: Mr. Grant Anderson



Authorized for release by:
12/3/2014 9:57:07 AM

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

denise.heckler@testamericainc.com

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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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Definitions/Glossary

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 86165-01-07, Penta Wood

TestAmerica Job ID: 240-44845-1

Qualifiers

GC Semi VOA

Qualifier	Qualifier Description
U	Indicates the analyte was analyzed for but not detected.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
□	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: 86165-01-07, Penta Wood

TestAmerica Job ID: 240-44845-1

Job ID: 240-44845-1

Laboratory: TestAmerica Canton

Narrative

CASE NARRATIVE

Client: Conestoga-Rovers & Associates, Inc.

Project: 86165-01-07, Penta Wood

Report Number: 240-44845-1

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.

RECEIPT

The samples were received on 11/26/2014; the samples arrived in good condition, properly preserved and on ice. The temperature of the coolers at receipt was 1.6 C.

CHLORINATED HERBICIDES

Sample W-141124-SR-EFF (240-44845-1) was analyzed for chlorinated herbicides in accordance with EPA SW-846 Method 8151A. The samples were prepared on 11/29/2014 and analyzed on 12/02/2014.

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.

Insufficient sample volume was available to perform a matrix spike/matrix spike duplicate/sample duplicate (MS/MSD/DUP) associated with batch 126729.

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: 86165-01-07, Penta Wood

TestAmerica Job ID: 240-44845-1

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

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 86165-01-07, Penta Wood

TestAmerica Job ID: 240-44845-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
240-44845-1	W-141124-SR-EFF	Water	11/24/14 13:35	11/26/14 10:20

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15

Detection Summary

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 86165-01-07, Penta Wood

TestAmerica Job ID: 240-44845-1

Client Sample ID: W-141124-SR-EFF

Lab Sample ID: 240-44845-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Pentachlorophenol	0.21		0.095	0.015	ug/L	4		8151A	Total/NA



This Detection Summary does not include radiochemical test results.

TestAmerica Canton

Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
 Project/Site: 86165-01-07, Penta Wood

TestAmerica Job ID: 240-44845-1

Client Sample ID: W-141124-SR-EFF

Lab Sample ID: 240-44845-1

Date Collected: 11/24/14 13:35

Matrix: Water

Date Received: 11/26/14 10:20

Method: 8151A - Herbicides (GC)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Pentachlorophenol	0.21		0.095	0.015	ug/L		11/29/14 12:20	12/02/14 14:07	4
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
2,4-Dichlorophenylacetic acid	90		32 - 140				11/29/14 12:20	12/02/14 14:07	4



Surrogate Summary

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 86165-01-07, Penta Wood

TestAmerica Job ID: 240-44845-1

Method: 8151A - Herbicides (GC)

Matrix: Water

Prep Type: Total/NA

Lab Sample ID	Client Sample ID	Percent Surrogate Recovery (Acceptance Limits)	
		DCPA1 (32-140)	DCPA2 (32-140)
240-44845-1	W-141124-SR-EFF	90	73
LCS 180-126729/2-A	Lab Control Sample	80	82
LCSD 180-126729/3-A	Lab Control Sample Dup	101	100
MB 180-126729/1-A	Method Blank	83	84

Surrogate Legend

DCPA = 2,4-Dichlorophenylacetic acid



QC Sample Results

Client: Conestoga-Rovers & Associates, Inc.
 Project/Site: 86165-01-07, Penta Wood

TestAmerica Job ID: 240-44845-1

Method: 8151A - Herbicides (GC)

Lab Sample ID: MB 180-126729/1-A						Client Sample ID: Method Blank				
Matrix: Water						Prep Type: Total/NA				
Analysis Batch: 126892						Prep Batch: 126729				
Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac	
Pentachlorophenol	0.50	U	0.50	0.078	ug/L		11/29/14 12:20	12/02/14 13:47	20	
Surrogate	%Recovery	MB Qualifier	Limits				Prepared	Analyzed	Dil Fac	
2,4-Dichlorophenylacetic acid	84		32 - 140				11/29/14 12:20	12/02/14 13:47	20	

Lab Sample ID: LCS 180-126729/2-A						Client Sample ID: Lab Control Sample				
Matrix: Water						Prep Type: Total/NA				
Analysis Batch: 126892						Prep Batch: 126729				
Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits	RPD
Pentachlorophenol			2.00	1.66		ug/L		83	40 - 140	
Surrogate	%Recovery	LCS Qualifier	Limits							RPD
2,4-Dichlorophenylacetic acid	82		32 - 140							

Lab Sample ID: LCSD 180-126729/3-A						Client Sample ID: Lab Control Sample Dup				
Matrix: Water						Prep Type: Total/NA				
Analysis Batch: 126892						Prep Batch: 126729				
Analyte			Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD Limit
Pentachlorophenol			2.00	2.13		ug/L		106	40 - 140	25 30
Surrogate	%Recovery	LCSD Qualifier	Limits							RPD
2,4-Dichlorophenylacetic acid	101		32 - 140							



QC Association Summary

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 86165-01-07, Penta Wood

TestAmerica Job ID: 240-44845-1

GC Semi VOA

Prep Batch: 126729

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-44845-1	W-141124-SR-EFF	Total/NA	Water	8151A	
LCS 180-126729/2-A	Lab Control Sample	Total/NA	Water	8151A	
LCSD 180-126729/3-A	Lab Control Sample Dup	Total/NA	Water	8151A	
MB 180-126729/1-A	Method Blank	Total/NA	Water	8151A	

Analysis Batch: 126892

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-44845-1	W-141124-SR-EFF	Total/NA	Water	8151A	126729
LCS 180-126729/2-A	Lab Control Sample	Total/NA	Water	8151A	126729
LCSD 180-126729/3-A	Lab Control Sample Dup	Total/NA	Water	8151A	126729
MB 180-126729/1-A	Method Blank	Total/NA	Water	8151A	126729



Lab Chronicle

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 86165-01-07, Penta Wood

TestAmerica Job ID: 240-44845-1

Client Sample ID: W-141124-SR-EFF

Lab Sample ID: 240-44845-1

Date Collected: 11/24/14 13:35

Matrix: Water

Date Received: 11/26/14 10:20

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	8151A			126729	11/29/14 12:20	CBY	TAL PIT
Total/NA	Analysis	8151A		4	126892	12/02/14 14:07	JMO	TAL PIT

Laboratory References:

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



Certification Summary

Client: Conestoga-Rovers & Associates, Inc.
 Project/Site: 86165-01-07, Penta Wood

TestAmerica Job ID: 240-44845-1

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	09-30-16
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	11-30-15
USDA	Federal		P330-10-00139	05-23-16
Utah	NELAP	8	STLP	05-31-15
Virginia	NELAP	3	460189	09-14-15
West Virginia DEP	State Program	3	142	01-31-15

* Certification renewal pending - certification considered valid.

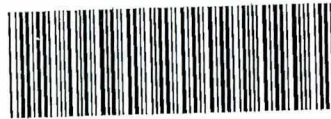


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TestAmerica Laboratories, Inc.

**CHAIN OF CUSTODY
AND
RECEIVING DOCUMENTS**



240-44845 Chain of Custody



Login Sample Receipt Checklist

Client: Conestoga-Rovers & Associates, Inc.

Job Number: 240-44845-1

Login Number: 44845
List Number: 2
Creator: Watson, Debbie

List Source: TestAmerica Pittsburgh
List Creation: 11/29/14 10:14 AM

Question	Answer	Comment
Radioactivity wasn't checked or is <=/ background as measured by a survey meter.	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	
Residual Chlorine Checked.	N/A	

