

Rec 1/21/14  
PUN ON BERTS  
1/22/14  
(99)

**Richard, Philip E - DNR**

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**From:** Ree, Timothy <tree@craworld.com>  
**Sent:** Wednesday, January 21, 2015 3:44 PM  
**To:** Richard, Philip E - DNR  
**Cc:** Endsley, Erin A - DNR; Martin, Linda  
**Subject:** Penta Wood - December 2014 eDMR ~COR-086165~  
**Attachments:** 358133.pdf

Phil,

Please find a copy of the Penta Wood December 2014 eDMR (Discharge Monitoring Report) submitted electronically in the WDNR Web Access Management System (WAMS) today (1/21/2015).

Regards,

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**Tim Ree**  
**Conestoga-Rovers & Associates (CRA)**  
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St Paul, MN 55112

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**Wastewater Discharge Monitoring Long Report**

**For DNR Use Only**

Facility Name: PENTA WOOD SF SITE  
 Contact Address: 1801 Old Highway 8 NW, Ste 114  
 Saint Paul, MN 55112-2307  
 Facility Contact: Timothy Ree, Engineer  
 Phone Number: (651) 639-0913  
 Reporting Period: 12/01/2014 - 12/31/2014  
 Form Due Date: 01/21/2015  
 Permit Number: 0061531

Date Received:	
DOC:	336603
FIN:	16088
FID:	807027980
Region:	Northern Region
Permit Drafter:	Drafter not set
Reviewer:	Kathy M. Bartilson
Office:	Spoooner

Sample Point	001	001	001	001
Description	Treated Groundwater Discharge	Treated Groundwater Discharge	Treated Groundwater Discharge	Treated Groundwater Discharge
Parameter	211	368	307	1287
Description	Flow Rate	Pentachloro- phenol	Naphthalene	Diesel Range Organics (DRO)
Units	gpd	ug/L	ug/L	mg/L
Sample Type	CONTINUOUS	GRAB	GRAB	GRAB
Frequency	DAILY	WEEKLY	MONTHLY	MONTHLY
Sample Results	<b>Day 1</b>	73420		
	<b>2</b>	69256	0.35	<0.20
	<b>3</b>	74644		
	<b>4</b>	73825		
	<b>5</b>	74029		
	<b>6</b>	75063		
	<b>7</b>	73279		
	<b>8</b>	70365		
	<b>9</b>	74009		
	<b>10</b>	75768	0.26	
	<b>11</b>	75147		
	<b>12</b>	65768		
	<b>13</b>	76030		
	<b>14</b>	75827		
	<b>15</b>	75802		
	<b>16</b>	72206	0.21	
	<b>17</b>	73465		
	<b>18</b>	75214		
	<b>19</b>	77106		
	<b>20</b>	74882		
	<b>21</b>	72433		
	<b>22</b>	67499		
	<b>23</b>	42089	0.13	
	<b>24</b>	0		
	<b>25</b>	0		
	<b>26</b>	0		
	<b>27</b>	0		
	<b>28</b>	0		
	<b>29</b>	0		
	<b>30</b>	0		
	<b>31</b>	0		

Sample Point	001	001	001	001	
Description	Treated Groundwater Discharge	Treated Groundwater Discharge	Treated Groundwater Discharge	Treated Groundwater Discharge	
Parameter	211	368	307	1287	
Description	Flow Rate	Pentachloro- phenol	Naphthalene	Diesel Range Organics (DRO)	
Units	gpd	ug/L	ug/L	mg/L	
Summary Values	Monthly Avg	53455.677419355	0.2375	0	
	Daily Max	77106	0.35	<0.2	
	Daily Min	0	0.13	<0.2	
Limit(s) in Effect	Monthly Avg	0.10	1	8	0
QA/QC Information	LOD	0.058*Footnote		0.061	0.077
	LOQ	0.11*Footnote		0.2	0.096
	QC Exceedance	N	N	N	N
	Lab Certification	113289110		999518190	

\*Footnote: QA/QC Information is not identical for each day, so the value shown is the maximum of all values for LOD/LOQ data or the first Lab found for Lab Cert data.

Footnotes (DNR Use Only; Instructions for completing this form that are unique for your facility may be displayed here.)

General Remarks

The December 2014 monthly average pentachlorophenol concentration exceeds the limit of 0.1 ug/L as reported above. WDNR and USEPA were promptly notified of the weekly compliance sample pentachlorophenol concentrations. A written report was submitted to WDNR and USEPA on December 8, 2014 discussing the non-compliance, potential cause of the non-compliance, and a proposed corrective action. A conference call was held on December 12, 2014 between CRA and WDNR to discuss the non-compliance and other issues. WDNR agreed with the corrective action.

Selected effluent samples collected on December 2 and 10, 2014 were filtered by the laboratory to evaluate whether small solid particles were contributing to the effluent pentachlorophenol concentrations and whether installation of a filter downstream of the carbon units may remove solid pentachlorophenol particles prior to discharge. Pentachlorophenol was detected in the filtered effluent samples at concentrations of 0.082 ug/L and 0.074 ug/L (estimated concentrations below the reporting limit). These concentrations indicate that some small solid particles were contributing to the effluent pentachlorophenol concentrations. However, dissolved pentachlorophenol still was present in the effluent.

Pentachlorophenol was subsequently detected at a concentration of 75 ug/L in one sample collected between the lead and lag carbon units on December 16, 2014. This concentration represented a pentachlorophenol breakthrough of the lead carbon unit and indicated that the carbon required replacement. Therefore, the system was shutdown on December 23, 2014 pending the carbon change-out.

The daily flow rates were estimated as reported above based on the effluent flowmeter flowrates.

Laboratory Quality Control Comments

Exceedence Comments

The December 2014 monthly average pentachlorophenol concentration exceeds the limit of 0.1 ug/L. WDNR and USEPA were promptly notified of the weekly compliance sample pentachlorophenol concentrations. A written report was submitted to WDNR and USEPA on December 8, 2014 discussing the non-compliance, potential cause of the non-compliance, and a proposed corrective action. A conference call was held on December 12, 2014 between CRA and WDNR to discuss the non-compliance and other issues. WDNR agreed with the corrective action.

Pentachlorophenol was subsequently detected at a concentration of 75 ug/L in one sample collected between the lead and lag carbon units on December 16, 2014. This concentration represented a pentachlorophenol breakthrough of the lead carbon unit and indicated that the carbon required replacement. Therefore, the system was shutdown on December 23, 2014 pending the carbon change-out.

Submitted by Timothy Ree(timdree0042) on 1/21/2015 3:38:56 PM