Rec 2/5/15
Put on BARTS
2/6/15
99

Richard, Philip E - DNR

From: Ree, Timothy <tree@craworld.com>
Sent: Thursday, February 05, 2015 12:04 PM
To: Richard, Philip E - DNR
Cc: Endsley, Erin A - DNR; Frehner, Ron; Storlie, Pete
Subject: Penta Wood - WPDES Compliance Sampling 1/27/2015 ~COR-086165~
Attachments: Lab Report-240-46714-1-086165-01-07-2015-02-05.pdf

Phil,

Please find attached a copy of the laboratory report for the WPDES compliance effluent sample collected at the Penta Wood site on 1/27/2015. PCP was detected at a concentration of 0.23 ug/L, which exceeds the permit limit of 0.1 ug/L. This represents the second sample collected after the carbon change-out and restarting the system. This also is the second and final sample collected in January; therefore, the average of January concentrations represent a noncompliance of the substantive WPDES permit requirements. Other compliance sample analyses (i.e., WI-DRO, naphthalene, metals, chloride) were performed on the samples collected on 1/27/2015; these analyses were not expedited and results are due next week.

As part of trouble shooting, CRA collected individual influent samples from each groundwater extraction well for laboratory analysis of pentachlorophenol, WI-DRO, and oil and grease. With the exception of well EW03, the samples were collected on 2/4/2015. A problem the EW03 pump prevented sample collection from that well, but the problem has since been resolved and a sample will be collected yet this week. We requested that the laboratory analyze the samples on an expedited turn-around-time basis (5-day) and expect to receive the results next week. The purpose of this sampling is to identify which extraction wells may be contributing to the increased influent concentration detected in December 2014 and if/where emulsified LNAPL is being extracted and contributing to the increased PCP levels in the influent water. Small amounts of emulsified LNAPL may be prevent treatment to the substantive permit limit by utilizing activated carbon only. CRA recommends that the system continue to operate while we evaluate corrective actions since the effluent concentration is less than 1 ug/L.

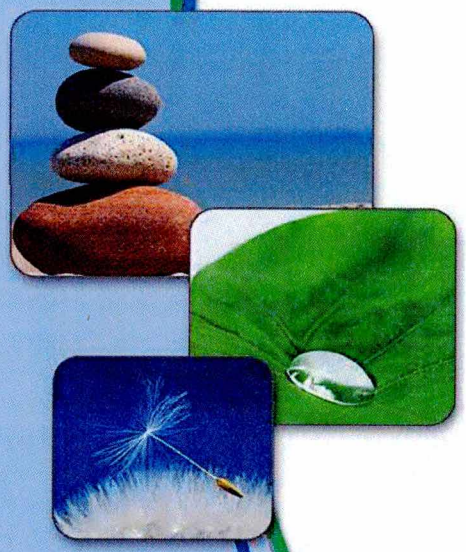
Please update Kathy Bartilson (WDNR) and Linda Martin (USEPA).

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

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



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: 240-46714-1
Client Project/Site: 86165-01-01, Penta Wood

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

Attn: Mr. Grant Anderson

Denise D Heckler

Authorized for release by:
2/5/2015 9:28:00 AM

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

Table of Contents

Qualifiers

GC Semi VOA

Qualifier	Qualifier Description
X	Surrogate is outside control limits
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)

Job ID: 240-46714-1

Laboratory: TestAmerica Canton

Narrative

CASE NARRATIVE

Client: Conestoga-Rovers & Associates, Inc.

Project: 86165-01-01, Penta Wood

Report Number: 240-46714-1

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 01/28/2015; the samples arrived in good condition, properly preserved and on ice. The temperature of the coolers at receipt was 3.3 C.

CHLORINATED HERBICIDES

Sample W-150127-PS-ME (240-46714-1) was analyzed for chlorinated herbicides in accordance with EPA SW-846 Method 8151A. The samples were prepared on 02/03/2015 and analyzed on 02/04/2015.

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).

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: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-46714-1

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: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-46714-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
240-46714-1	W-150127-PS-ME	Water	01/27/15 13:15	01/28/15 09:45

Detection Summary

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

TestAmerica Job ID: 240-46714-1

Client Sample ID: W-150127-PS-ME

Lab Sample ID: 240-46714-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Pentachlorophenol	0.23		0.095	0.015	ug/L	4		8151A	Total/NA

This Detection Summary does not include radiochemical test results.

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

TestAmerica Job ID: 240-46714-1

Client Sample ID: W-150127-PS-ME
Date Collected: 01/27/15 13:15
Date Received: 01/28/15 09:45

Lab Sample ID: 240-46714-1
Matrix: Water

Method: 8151A - Herbicides (GC)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Pentachlorophenol	0.23		0.095	0.015	ug/L		02/03/15 09:37	02/04/15 13:46	4

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
2,4-Dichlorophenylacetic acid	*40*		*32 - 140*	*02/03/15 09:37*	*02/04/15 13:46*	*4*

Surrogate Summary

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

TestAmerica Job ID: 240-46714-1

Method: 8151A - Herbicides (GC)

Matrix: Water

Prep Type: Total/NA

		Percent Surrogate Recovery (Acceptance Limits)	
		DCPA1	DCPA2
Lab Sample ID	**Client Sample ID**	**(32-140)**	**(32-140)**
240-46714-1	W-150127-PS-ME	40	31 X
LCS 180-132482/2-A	Lab Control Sample	81	72
LCSD 180-132482/3-A	Lab Control Sample Dup	78	71
MB 180-132482/1-A	Method Blank	53	44

Surrogate Legend

DCPA = 2,4-Dichlorophenylacetic acid

Method: 8151A - Herbicides (GC)

Lab Sample ID: MB 180-132482/1-A
Matrix: Water
Analysis Batch: 132611

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 132482

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Pentachlorophenol	0.10	U	0.10	0.016	ug/L		02/03/15 09:37	02/04/15 16:30	4

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
2,4-Dichlorophenylacetic acid	*53*		*32 - 140*	*02/03/15 09:37*	*02/04/15 16:30*	*4*

Lab Sample ID: LCS 180-132482/2-A
Matrix: Water
Analysis Batch: 132611

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 132482

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Pentachlorophenol	2.50	2.78		ug/L		111	40 - 140

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
2,4-Dichlorophenylacetic acid	*81*		*32 - 140*

Lab Sample ID: LCSD 180-132482/3-A
Matrix: Water
Analysis Batch: 132611

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA
Prep Batch: 132482

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Pentachlorophenol	2.50	2.67		ug/L		107	40 - 140	4	30

Surrogate	*LCSD %Recovery*	*LCSD Qualifier*	*Limits*
2,4-Dichlorophenylacetic acid	*78*		*32 - 140*

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

TestAmerica Job ID: 240-46714-1

GC Semi VOA

Prep Batch: 132482

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-46714-1	W-150127-PS-ME	Total/NA	Water	8151A	
LCS 180-132482/2-A	Lab Control Sample	Total/NA	Water	8151A	
LCSD 180-132482/3-A	Lab Control Sample Dup	Total/NA	Water	8151A	
MB 180-132482/1-A	Method Blank	Total/NA	Water	8151A	

Analysis Batch: 132611

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-46714-1	W-150127-PS-ME	Total/NA	Water	8151A	132482
LCS 180-132482/2-A	Lab Control Sample	Total/NA	Water	8151A	132482
LCSD 180-132482/3-A	Lab Control Sample Dup	Total/NA	Water	8151A	132482
MB 180-132482/1-A	Method Blank	Total/NA	Water	8151A	132482

Lab Chronicle

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

TestAmerica Job ID: 240-46714-1

Client Sample ID: W-150127-PS-ME
Date Collected: 01/27/15 13:15
Date Received: 01/28/15 09:45

Lab Sample ID: 240-46714-1
Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	8151A			132482	02/03/15 09:37	JPM	TAL PIT
Total/NA	Analysis	8151A		4	132611	02/04/15 13:46	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: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-46714-1

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	03-31-15
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	12-31-15
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	01-31-16
Wisconsin	State Program	5	998027800	08-31-15

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

TestAmerica Laboratories, Inc.

CHAIN OF CUSTODY
AND
RECEIVING DOCUMENTS

240-46714 Chain of Custody

4101 Shuffel Street, N.W. North Canton, OH 44720 tel 330.497.9396 fax 330.497.0772 www.testamericainc.com

CHAIN OF CUSTODY RECORD 2 of 3

COC NO.: SP- 01294

PAGE ___ OF ___

(See Reverse Side for Instructions)

CONESTOGA-ROVERS & ASSOCIATES
1801 Old Highway 8 Northwest, Suite 114
St. Paul, Minnesota 55112 United States
Phone: (651) 639-0913 Fax: (651) 639-0923

Project No/ Phase/Task Code: 086165-01-01	**Laboratory Name:** Test America	**Lab Location:** N. Canton	**SSOW ID:**
Project Name: Penta Wood	**Lab Contact:**	**Lab Quote No:**	**Cooler No:**
Project Location: Siren, WI			**Carrier:**
Chemistry Contact: ganderson@craworld.com			**Airbill No:**
Sampler(s): P. Starlie			**Date Shipped:**

Item	Sample Identification (Containers for each sample may be combined on one line)	Date (mm/dd/yy)	Time (hr:min)	Sample Type: Matrix Code (see back of COC)	Sample Type: Grab (G) or Comp (C)	Container Quantity & Preservation: Unpreserved	HCl	HNO_3	H_2SO_4	NaOH	Methanol/Water (Soil VOC)	EnCores 3x5-g, 1x25-g	Other:	Total Containers/Sample	Analysis Requested (See Back of COC for Definitions): PCP-8151	MS/MSD Request	Comments/ Special Instructions:
1	W-150127-PS-ME	01/27/15	1315	W	G	2								2	X		Monthly Effluent
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	
11																	
12																	
13																	
14																	
15																	

Page 15 of 17

TAT Required in business days (use separate COCs for different TATs):
☐ 1 Day ☐ 2 Days ☐ 3 Days ☐ 1 Week ☐ 2 Week ☒ Other: 5-day

Total Number of Containers: 2

All Samples in Cooler must be on COC

Notes/ Special Requirements:

Relinquished By	Company	Date	Time	Received By	Company	Date	Time
1. Peter Starlie	CRA	1/27/15	1415	1.	TA	1-28-15	7:45
2.				2.			
3.				3.			

2/5/2015

THE CHAIN OF CUSTODY IS A LEGAL DOCUMENT – ALL FIELDS MUST BE COMPLETED ACCURATELY

Distribution: WHITE – Fully Executed Copy (CRA) YELLOW – Receiving Laboratory Copy PINK – Shipper GOLDENROD – Sampling Crew

CRA Form: COC-10A (20110804)

TestAmerica Canton Sample Receipt Form/Narrative **Login # : 40714**
Canton Facility

Client CQA Site Name _____ Cooler unpacked by:

Cooler Received on 1-28-15 Opened on 1-28-15

FedEx: 1st Grd Exp UPS FAS Stetson Client Drop Off TestAmerica Courier Other

Receipt After-hours: Drop-off Date/Time _____ Storage Location _____

TestAmerica Cooler # _____ Foam Box Client Cooler Box Other _____

Packing material used: Bubble Wrap Foam Plastic Bag None Other _____

COOLANT: Wet Ice Blue Ice Dry Ice Water None

1. Cooler temperature upon receipt

IR GUN# A	(CF +4.0 °C)	Observed Cooler Temp. _____ °C	Corrected Cooler Temp. _____ °C	☐ See Multiple Cooler Form
IR GUN# 4	(CF +1.2 °C)	Observed Cooler Temp. _____ °C	Corrected Cooler Temp. _____ °C	
IR GUN# 5	(CF +0.4 °C)	Observed Cooler Temp. _____ °C	Corrected Cooler Temp. _____ °C	
IR GUN# 8	(CF +0.7 °C)	Observed Cooler Temp. 2.6 °C	Corrected Cooler Temp. 3.3 °C	

2. Were custody seals on the outside of the cooler(s)? If Yes Quantity 2 Yes No
   -Were custody seals on the outside of the cooler(s) signed & dated? Yes No NA
   -Were custody seals on the bottle(s)? Yes No
3. Shippers' packing slip attached to the cooler(s)? Yes No
4. Did custody papers accompany the sample(s)? Yes No
5. Were the custody papers relinquished & signed in the appropriate place? Yes No
6. Did all bottles arrive in good condition (Unbroken)? Yes No
7. Could all bottle labels be reconciled with the COC? Yes No
8. Were correct bottle(s) used for the test(s) indicated? Yes No
9. Sufficient quantity received to perform indicated analyses? Yes No
10. Were sample(s) at the correct pH upon receipt? Yes No NA pH Strip Lot# **HC425511**
11. Were VOAs on the COC? Yes No
12. Were air bubbles >6 mm in any VOA vials? Yes No NA
13. Was a trip blank present in the cooler(s)? Yes No

Contacted PM _____ Date _____ by _____ via Verbal Voice Mail Other
Concerning

14. CHAIN OF CUSTODY & SAMPLE DISCREPANCIES Samples processed by:

15. SAMPLE CONDITION

Sample(s) _____ were received after the recommended holding time had expired.
Sample(s) _____ were received in a broken container.
Sample(s) _____ were received with bubble >6 mm in diameter. (Notify PM)

16. SAMPLE PRESERVATION

Sample(s) _____ were further preserved in the laboratory.
Time preserved: _____ Preservative(s) added/Lot number(s): _____

Login Sample Receipt Checklist

Client: Conestoga-Rovers & Associates, Inc.

Job Number: 240-46714-1

Login Number: 46714
List Number: 2
Creator: Watson, Debbie

List Source: TestAmerica Pittsburgh
List Creation: 01/29/15 02:31 PM

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	