#### **Richard, Philip E - DNR**

	(cc)
From:	Ree, Timothy <tree@craworld.com></tree@craworld.com>
Sent:	Monday, May 11, 2015 4:17 PM
То:	Richard, Philip E - DNR
Cc:	Frehner, Ron; Sandberg, Brian; Storlie, Pete; Robinson, John H - DNR; Fassbender, Judy L - DNR
Subject:	RE: Penta Wood - WPDES Compliance Sampling 4/30/2015~COR-086165~
Attachments:	Lab Report-240-50158-1-086165-01-07-2015-05-11.pdf

Rec SIII/15 put un BRATS SZIZ/15

Phil,

Please find attached the results for the effluent sample collected at the Penta Wood site on 4/30/2015. The sample was collected a few hours after modifying the pumping as discussed below. PCP was detected in the effluent sample at a concentration of 0.071 ug/L (estimated). Based on the four effluent samples collected in April, the average PCP concentration is 0.091 ug/L, which meets the criteria.

CRA also collected an influent sample on 4/30/2015 after the pumping modification. We will provide those results after receiving the lab report.

We will measure groundwater levels at the site this week to confirm hydraulic capture is still being maintained.

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

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

Regards,

Tim

From: Ree, Timothy
Sent: Thursday, April 30, 2015 11:09 AM
To: Philip Richard (Philip.Richard@wisconsin.gov); Robinson, John H - DNR (John.Robinson@wisconsin.gov); Judy Fassbender (Judy.Fassbender@wisconsin.gov)
Cc: Frehner, Ron; Sandberg, Brian; Storlie, Pete
Subject: RE: Penta Wood - WPDES Compliance Sampling 4/6/2015 and 4/16/2015 ~COR-086165~
Importance: High

Phil/John/Judy,

Please find attached the results for the additional sampling conducted at the Penta Wood site on 4/23/2015. The purpose of the sampling was to evaluate how to potentially modify the pumping strategy to address elevated influent PCP concentrations and reduce effluent PCP concentrations.

The good news is that PCP was detected at a concentration of 0.077 ug/L (estimated) in the effluent sample, which meets the permit limit of 0.1 ug/L. Based on the three effluent samples collected in April, the average PCP concentration is 0.097 ug/L, which meets the criteria. We will collect the last effluent sample for April this afternoon.

Additional good news is that PCP was detected at a concentration of 0.15 ug/L in the sample collected between the carbon units. This indicates that a carbon change-out is not required, yet.

Additional influent sampling was conducted at each of the five active extraction wells (EW2, EW4, EW7, EW13, and EW14). PCP concentrations remained relatively low and consistent with sampling in August 2014 and February 2015 in wells EW2 and EW4. PCP concentrations increased significantly in wells EW7, EW13, and EW14 as compared to the August 2014 and February 2015 results. CRA believes that emulsified oil is now being removed from these three wells (EW7, EW13, and EW14) with the increased extraction rates (increased from approximately 6 gpm to 10 gpm per well). The combined influent PCP concentration on 4/23/2015 was approximately double that of the sample collected on 4/3/2015. The influent PCP analytical data and pumping rates are summarized in the attached Table 1.

CRA recommends that the pumping strategy be modified as follows:

- EW2 increase pumping rate from 10 gpm to 12 gpm
- EW4 increase pumping rate from 10 gpm to 12 gpm
- EW6 increase pumping rate from 0 gpm to 6 gpm
- EW7 decrease pumping rate from 10 gpm to 0 gpm
- EW13 -- decrease pumping rate from 10 gpm to 0 gpm
- EW14 decrease pumping rate from 10 gpm to 0 gpm

This would provide a total extraction rate of approximately 30 gpm and should reduce the combined influent PCP concentration. CRA would measure water levels at the site within 2 weeks of making the pumping change to confirm hydraulic capture is still achieved.

If you agree with this recommendation, please update Kathy Bartilson (WDNR) and Linda Martin (USEPA) and request their approval. We are prepared to make the pumping changes this afternoon before collecting the effluent sample.

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

Regards, Tim

From: Ree, Timothy
Sent: Wednesday, April 22, 2015 8:45 AM
To: Philip Richard (Philip.Richard@wisconsin.gov); Robinson, John H - DNR (John.Robinson@wisconsin.gov)
Cc: Frehner, Ron; Sandberg, Brian; Storlie, Pete
Subject: Penta Wood - WPDES Compliance Sampling 4/6/2015 and 4/16/2015 ~COR-086165~
Importance: High

Phil/John,

Please find attached copies of the laboratory reports for the WPDES compliance sampling conducted at the Penta Wood site on 4/6/2015 and 4/16/2015. PCP was detected at a concentration of 0.094 ug/L (estimated) on 4/6/2015, which meets the permit limit of 0.1 ug/L. PCP was detected at a concentration of 0.12 ug/L on 4/16/2015, which exceeds the permit limit of 0.1 ug/L. This represents the first sample collected that exceeds the permit limit since implementing the modified pumping strategy on 2/13/2015. However, this result does not represent a noncompliance of the substantive WPDES permit requirements since additional weekly effluent sampling is required to determine the monthly average. Based on the two effluent samples collected in April, the average effluent PCP concentration is 0.107 ug/L. All other parameters met the permit criteria.

Effluent PCP concentrations have been slightly increasing for the past month, but this is the first sample that exceeded the criteria. It has been about 3 months since a carbon change-out was completed and the system was restarted on 1/19/2015.

After the pumping modification, PCP was detected in the influent samples at 480 ug/L in February and 390 ug/L in March. PCP was detected at a significantly increased concentration of 1,500 ug/L in the influent sample on 4/6/2015. CRA believes that we are now extracting emulsified LNAPL from at least one of the extraction wells and that is the reason the effluent exceeded the permit limit.

PCP was detected at 0.016 ug/L (estimated) in the sample collected between the carbon units on 4/10/2015.

CRA recommends that additional samples for PCP be collected of total influent, individual influent at the five active extraction wells, effluent, and between the carbon units to further evaluate whether an adjustment of the current pumping strategy can be made to reduce the influent concentrations and thereby improve treatment to meet the permit limits and still maintain hydraulic capture of the plume area. The analyses would be expedited in an attempt to make a pumping adjustment and collect a subsequent effluent sample before the end of the month. If results are favorable, the monthly average would meet the effluent permit limit.

As we have done in the past, the costs for these additional analyses would be billed under the contract unit prices for expedited PCP analysis. CRA estimates that the additional costs for this sampling and shipping would be less than \$1,500.

If you agree with this recommendation, please update Kathy Bartilson (WDNR) and Linda Martin (USEPA) and request their approval. We are prepared to collect these samples as soon as we receive approval.

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

Regards,

J.

Tim Ree Conestoga-Rovers & Associates (CRA) 1801 Old Highway 8 NW, Suite 114 St Paul, MN 55112

 Phone: 651.639.0913

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 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: 240-50158-1 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

Jenuse DHeckler

Authorized for release by: 5/11/2015 1:39:58 PM

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.

TestAmerica Job ID: 240-50158-1

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# **Table of Contents**

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## **Definitions/Glossary**

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

#### TestAmerica Job ID: 240-50158-1

## Qualifiers

GC Semi V	AOA
Qualifier	Qualifier Description
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.
х	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: 240-50158-1

#### Laboratory: TestAmerica Canton

#### Narrative

## CASE NARRATIVE

#### Client: Conestoga-Rovers & Associates, Inc.

#### Project: 86165-01-01, Penta Wood

#### Report Number: 240-50158-1

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 05/02/2015; the samples arrived in good condition, properly preserved and on ice. The temperature of the coolers at receipt was 3.9 C.

#### **CHLORINATED HERBICIDES**

Sample W-150430-PS-WE (240-50158-1) was analyzed for chlorinated herbicides in accordance with EPA SW-846 Method 8151A. The samples were prepared on 05/05/2015 and analyzed on 05/07/2015.

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) associated with 140631.

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

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

TestAmerica Job ID: 240-50158-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
240-50158-1	W-150430-PS-WE	Water	04/30/15 18:20	05/02/15 09:30

**Detection Summary** 

Client: Conestoga-Rovers & Associates, Inc. Project/Site: 86165-01-01, Penta Wood TestAmerica Job ID: 240-50158-1

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Client Sample ID: W-150430-PS-WE						Lab S	Sar	nple ID:	240-50158-1
Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Ргер Туре
Pentachlorophenol	0.071	J	0.094	0.015	ug/L	4	-	8151A	Total/NA

This Detection Summary does not include radiochemical test results.

## **Client Sample Results**

Client: Conestoga-Rovers & Associates, Inc. Project/Site: 86165-01-01, Penta Wood TestAmerica Job ID: 240-50158-1

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Client Sample ID: W-150	430-PS-WE		-			I	ab Sample	e ID: 240-50	158-1
Date Collected: 04/30/15 18:2	20							Matrix	Water
Date Received: 05/02/15 09:3	0	I							
Method: 8151A - Herbicides	s (GC) Result	Qualifier	RI	MDI	Unit	п	Prenared	Analyzed	Dil Fac
Pentachlorophenol	0.071	J	0.094	0.015	ug/L		05/05/15 15:30	05/07/15 12:25	4
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
2,4-Dichlorophenylacetic acid	59		32 - 140				05/05/15 15:30	05/07/15 12:25	4

## Method: 8151A - Herbicides (GC)

#### Matrix: Water Prep Type: Total/NA Percent Surrogate Recovery (Acceptance Limits) DCPA2 DCPA1 (32-140) (32-140) Lab Sample ID **Client Sample ID** 240-50158-1 W-150430-PS-WE 53 59 58 50 LCS 180-140631/2-A Lab Control Sample 51 LCSD 180-140631/3-A Lab Control Sample Dup 54 MB 180-140631/1-A Method Blank 110 143 X Surrogate Legend

DCPA = 2,4-Dichlorophenylacetic acid

TestAmerica Job ID: 240-50158-1

5

Method: 8151A - Herb	icides (GC)	)												
Lab Sample ID: MB 180-1	40631/1-A									Cli	ent Sam	ole ID: Me	ethod	Blank
Matrix: Water												Prep Typ	e: To	tal/NA
Analysis Batch: 140883												Prep Ba	tch: 1	40631
		MB	MB									•		
Analyte	Res	sult	Qualifier		RL	1	MDL U	nit	ļ	DF	Prepared	Analyz	ed	Dil Fac
Pentachlorophenol	0	0.10	U		0.10	C	.016 ug	g/L		05/0	05/15 15:30	05/07/15	12:46	4
-		MВ	MB											
Surrogate	%Recov	rery	Qualifier	Lim	its					F	Prepared	Analyz	ed	Dil Fac
2,4-Dichlorophenylacetic acid		110		32 -	140					05/0	05/15 15:30	05/07/15	12:46	4
Lab Sample ID: LCS 180-	140631/2-A								Clie	nt Sa	mple ID:	Lab Con	trol S	ample
Matrix: Water												Prep Typ	e: To	tal/NA
Analysis Batch: 140883				12.00								Prep Ba	tch: 1	40631
				Spike		LCS	LCS					%Rec.		
Analyte				Added		Result	Qualifi	er	Unit	D	%Rec	Limits		
Pentachlorophenol				2.50		2.06			ug/L		83	40 - 140		
	LCS	LCS												
Surrogate	%Recovery	Qua	lifier	Limits										
2,4-Dichlorophenylacetic acid	58			32 - 140	-									
Lab Sample ID: LCSD 180	)-140631/3-A							С	lient Sa	mple	ID: Lab	Control S	Sampl	le Dup
Matrix: Water												Prep Typ	e: Io	tal/NA
Analysis Batch: 140883				Sniko								Ргер Ва	tcn: 1	40631
Analyte						Result	Qualifi	or	Unit	п	%Rec	/inite	RPD	Limit
Pentachlorophenol				2.50		2.03	quain				81	40, 140	2	30
			_			0					υ.		-	50
0	LCSD	LCS	D											
Surrogate	%Recovery	Qua	lifier	Limits										
2,4-Dichlorophenylacetic acid	54			32 - 140										

## **QC Association Summary**

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

Lab Control Sample

Method Blank

Lab Control Sample Dup

TestAmerica Job ID: 240-50158-1

8151A

8151A

8151A

Water

Water

Water

## GC Semi VOA

#### Prep Batch: 140631

LCS 180-140631/2-A

MB 180-140631/1-A

LCSD 180-140631/3-A

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-50158-1	W-150430-PS-WE	Total/NA	Water	8151A	······
LCS 180-140631/2-A	Lab Control Sample	Total/NA	Water	8151A	
LCSD 180-140631/3-A	Lab Control Sample Dup	Total/NA	Water	8151A	
MB 180-140631/1-A	Method Blank	Total/NA	Water	8151A	
Analysis Batch: 1408	83				
Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-50158-1	W-150430-PS-WE	Total/NA	Water	8151A	140631

Total/NA

Total/NA

Total/NA

140631

140631

TestAmerica Job ID: 240-50158-1

Lab Sample ID: 240-50158-1

Matrix: Water

#### Client Sample ID: W-150430-PS-WE Date Collected: 04/30/15 18:20 Date Received: 05/02/15 09:30

	Batch	Batch		Dilution	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	8151A			140631	05/05/15 15:30	CBY	TAL PIT
Total/NA	Analysis	8151A		4	140883	05/07/15 12:25	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

## 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

The certifications listed below are applicable to this report.

Authority	Program	EPA Region	Certification ID	Expiration Date
Wisconsin	State Program	5	998027800	08-31-15

TestAmerica Laboratories, Inc.

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## CHAIN OF CUSTODY AND RECEIVING DOCUMENTS

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ENVIRONMENTAL TESTING



& ASSOCIATES						1801 Old Highway 8 Northwest, Suite 114 St. Paul, Minnesota 55112 United States Phone: (651) 639-0913 Fax: (651) 639-0923											(	(See	PAGE Reverse Side f	s <u> </u>	OF				
Project No/ Phase/Task Code: 086165-01-01				Laboratory Name: Test America Lab Location: N. Counto									on	1	1	SSOW ID:									
Project Name: Penta Wood			Lab	Cont	act:		P. Heckler					Lab Quote No:									Cooler No:				
Project Location: Siren, WI				IPLE PE	CONTAINER QUANTITY & PRESERVATION						ANALYSIS REQUESTED						1	Carrier: Fee	10	~					
Shemistry Contact: Ganderson@Crawor/d.Com				np (C)		d (HCI)	(8	SO4)	le	(Soil	x25-g		Sample	-								1	Airbill No:		
Sampler(s): P. Storlie				G) or Cor	served	chloric Aci	Acid (HNO	c Acid (H <sub>2</sub>	n Hydroxic	ol/Water	es 3x5-g, 1		ontainers	Sis	5						D Request		Date Shipped: 5 - 1	- / 9	5
SAMPLE IDENTIFICATION (Containers for each sample may be combined on one line)	DATE (mm/dd//yy)	TIME (hh:mm)	Matrix (see b	Grab (	Unpres	Hydrod	Nitric /	Sulfuri	Sodiun (NaOH)	Methar VOC)	EnCore	Other:	Total C	J.C.	11-6						ISW/SM		Comm Special Ins	ENTS/ TRUC	, TIONS
W-150430-PS-WE	4/30/15	1820	Ŵ	G	2								2	X								$\downarrow$	Weekly C	FAI	uert
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TestAmerica Canton Sample Receipt Form/Narrative	1#: <u>\$015:8</u>
Client CD/4 Site Name DE/ATTA NOOD	Cooler unpacked by:
$\frac{1}{10000000000000000000000000000000000$	Longie Ronon
EndEx: 1 <sup>st</sup> Grd (Exp.) LIPS EAS Statson Client Drop Off Test America Courier	Other
Receipt After-hours: Drop-off Date/Time Storage Location	Uniqu
TestAmerica Cooler # NIO # Eoam Box Client Cooler Box Other	
Packing material used: Bubble Wrap Foam Plastic Bag None Other	1
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.         IR GUN# 4 (CF +0.5 °C) Observed Cooler Temp.       °C Corrected Cooler Temp.         IR GUN# 5 (CF +0.4 °C) Observed Cooler Temp.       °C Corrected Cooler Temp.         IR GUN# 8 (CF -1.2 °C) Observed Cooler Temp.       °C Corrected Cooler Temp.	See Multiple         emp.       °C         See Multiple         cooler Form         mp.       °C         No         No
Concerning Date by via Verbal V	oice Mail Other
14. CHAIN OF CUSTODY & SAMPLE DISCREPANCIES	Samples processed by:
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	<i>b</i>
15. SAMPLE CONDITION	ing time had owing t
15. SAMPLE CONDITION Sample(s)	ing time had expired.
15. SAMPLE CONDITION         Sample(s)	ing time had expired. l in a broken container. in diameter. (Notify PM)
15. SAMPLE CONDITION         Sample(s)	ing time had expired. d in a broken container. in diameter. (Notify PM)
15. SAMPLE CONDITION         Sample(s)	ing time had expired. d in a broken container. in diameter. (Notify PM)
15. SAMPLE CONDITION         Sample(s)	ing time had expired. l in a broken container. in diameter. (Notify PM)

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Ref: SOP NC-SC-0005, Somple Receiving X:VX-Drive Document Control/SOPs/Work Instructions/Word Version Work Instructions/WI-NC-099P-042315 Cooler Receipt Form.doc djl .

4 5 6

## Login Sample Receipt Checklist

Client: Conestoga-Rovers & Associates, Inc.

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#### Job Number: 240-50158-1

# Login Number: 50158 List Source: TestAmerica Pittsburgh List Number: 2 List Creation: 05/05/15 12:04 PM Creator: Watson, Debbie Answer Question Answer Radioactivity wasn't checked or is </= background as measured by a survey</td> True

meter.							
The cooler's custody seal, if present, is intact.	True						
Sample custody seals, if present, are intact.							
The cooler or samples do not appear to have been compromised or tampered with.							
Samples were received on ice.							
Cooler Temperature is acceptable.							
Cooler Temperature is recorded.							
COC is present.							
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?							
There are no discrepancies between the containers received and the COC.							
Samples are received within Holding Time.							
Sample containers have legible labels.							
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.							
Residual Chlorine Checked.							