

Ree 8/11/15
put on BARRIS
8/12/15
(99)

Richard, Philip E - DNR

From: Ree, Timothy <Tim.Ree@ghd.com>
Sent: Tuesday, August 11, 2015 3:41 PM
To: Richard, Philip E - DNR
Cc: Frehner, Ron; Storlie, Pete
Subject: FW: Penta Wood - Between Carbon Unit Sampling 8/4/2015 ~COR-086165~
Attachments: Lab Report-240-53946-1-086165-01-06-2015-08-11.pdf

Phil,

Please find attached the results for the sample collected between the carbon units on 8/4/2015. PCP was detected at a concentration of 0.14 ug/L, which is approximately the same as during July 2015 (0.18 ug/L) and indicates that a carbon exchange is not required. The results of the influent and effluent compliance samples collected on 8/4/2015 are not available, yet.

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

Regards,
Tim

From: Ree, Timothy
Sent: Tuesday, August 11, 2015 10:57 AM
To: Philip Richard (Philip.Richard@wisconsin.gov)
Cc: Frehner, Ron; Storlie, Pete
Subject: Penta Wood - WPDES Compliance Sampling 7/29/2015 ~COR-086165~

Phil,

Please find attached the results for the effluent sample collected at the Penta Wood site on 7/29/2015. PCP was detected at a concentration of 0.064 ug/L (estimated), which is below the permit criteria of 0.1 ug/L. The average effluent concentration for the five samples collected in July 2015 is 0.11 ug/L and represents a non-compliance with the substantive WPDES permit criteria.

PCP was detected at a concentration of 0.16 ug/L in the effluent sample collected on 7/21/2015. As part of a previous corrective action implemented on 7/23/2015 to reduce the influent concentrations and improve treatment, the pumping rate at well EW06 was decreased and the pumping rates at EW02 and EW04 were increased. The 7/29/2014 effluent PCP concentration was less than half of the 7/21/2015 effluent PCP concentration, which indicates that the corrective action was successful.

Sampling between the carbon units in June and July indicated that a carbon exchange was not necessary. We collected an influent sample and a sample between the carbon units on 8/4/2015 to assess the timing of a carbon exchange and assess whether additional pumping modifications are required. The results of this sampling should be available by 8/19/2015.

GHD recommends that we continue to operate the system and re-assess following the receipt of the 8/4/2015 sample results.

Section 3.2.1 of the substantive permit states that the non-compliance shall be reported to the Department's regional office (Spooner) within 24 hours and that a written report describing the noncompliance be submitted to the

Department within 5 days. We will document these results and the corrective action on the monthly discharge monitoring form. Please update Kathy Bartilson (WDNR) and Linda Martin (USEPA), and ask Kathy Bartilson whether a more detailed/formal notification is necessary to document the July 2015 non-compliance.

Regards,

Tim Ree

GHD

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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: 240-53946-1

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

For:

GHD Services Inc.
1801 Old Highway 8 NW
Suite 114
St. Paul, Minnesota 55112

Attn: Mr. Grant Anderson



Authorized for release by:
8/11/2015 10:37:13 AM

Denise Heckler, Project Manager II
(330)966-9477
denise.heckler@testamericainc.com

LINKS

Review your project
results through
Total Access

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The
Expert**

Visit us at:
www.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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Table of Contents

Cover Page	1
Table of Contents	2
Definitions/Glossary	3
Case Narrative	4
Method Summary	5
Sample Summary	6
Detection Summary	7
Client Sample Results	8
Surrogate Summary	9
QC Sample Results	10
QC Association Summary	11
Lab Chronicle	12
Certification Summary	13
Chain of Custody	14
Receipt Checklists	17

Definitions/Glossary

Client: GHD Services Inc.
Project/Site: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-53946-1

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: GHD Services Inc.
Project/Site: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-53946-1

Job ID: 240-53946-1

Laboratory: TestAmerica Canton

Narrative

CASE NARRATIVE

Client: GHD Services Inc.

Project: 86165-01-01, Penta Wood

Report Number: 240-53946-1

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 08/05/2015; 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-150804-TB-BG (240-53946-1) was analyzed for chlorinated herbicides in accordance with EPA SW-846 Method 8151A. The samples were prepared on 08/07/2015 and analyzed on 08/10/2015.

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 analytical batch 180-150167.

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



Method Summary

Client: GHD Services Inc.
Project/Site: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-53946-1

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: GHD Services Inc.
Project/Site: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-53946-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
240-53946-1	W-150804-TB-BG	Water	08/04/15 11:10	08/05/15 09:30

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Detection Summary

Client: GHD Services Inc.
Project/Site: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-53946-1

Client Sample ID: W-150804-TB-BG

Lab Sample ID: 240-53946-1

Analyte	Result	Qualifier	LOQ	LOD	Unit	Dil Fac	D	Method	Prep Type
Pentachlorophenol	0.14		0.096	0.015	ug/L	4		8151A	Total/NA

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This Detection Summary does not include radiochemical test results.

TestAmerica Canton

Client Sample Results

Client: GHD Services Inc.
 Project/Site: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-53946-1

Client Sample ID: W-150804-TB-BG

Lab Sample ID: 240-53946-1

Date Collected: 08/04/15 11:10

Matrix: Water

Date Received: 08/05/15 09:30

Method: 8151A - Herbicides (GC)

Analyte	Result	Qualifier	LOQ	LOD	Unit	D	Prepared	Analyzed	Dil Fac
Pentachlorophenol	0.14		0.096	0.015	ug/L		08/07/15 17:00	08/10/15 13:34	4
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
2,4-Dichlorophenylacetic acid	53		32 - 140				08/07/15 17:00	08/10/15 13:34	4



Surrogate Summary

Client: GHD Services Inc.
Project/Site: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-53946-1

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)
240-53946-1	W-150804-TB-BG	53	47
LCS 180-150167/2-A	Lab Control Sample	58	51
LCSD 180-150167/3-A	Lab Control Sample Dup	65	58
MB 180-150167/1-A	Method Blank	61	56

Surrogate Legend

DCPA = 2,4-Dichlorophenylacetic acid



QC Sample Results

Client: GHD Services Inc.
Project/Site: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-53946-1

Method: 8151A - Herbicides (GC)

Lab Sample ID: MB 180-150167/1-A						Client Sample ID: Method Blank			
Matrix: Water						Prep Type: Total/NA			
Analysis Batch: 150322						Prep Batch: 150167			
Analyte	MB	MB	LOQ	LOD	Unit	D	Prepared	Analyzed	Dil Fac
Pentachlorophenol	Result	Qualifier	0.50	0.078	ug/L	-	08/07/15 17:00	08/10/15 13:09	20
Surrogate									
	MB	MB	Limits				Prepared	Analyzed	Dil Fac
2,4-Dichlorophenylacetic acid	%Recovery	Qualifier	32 - 140				08/07/15 17:00	08/10/15 13:09	20

Lab Sample ID: LCS 180-150167/2-A						Client Sample ID: Lab Control Sample			
Matrix: Water						Prep Type: Total/NA			
Analysis Batch: 150322						Prep Batch: 150167			
Analyte			Spike	LCS	LCS				
Pentachlorophenol			Added	Result	Qualifier	Unit	D	%Rec	Limits
			5.00	3.50		ug/L	-	70	40 - 140
Surrogate									
	LCS	LCS							
2,4-Dichlorophenylacetic acid	%Recovery	Qualifier							Limits
	58								32 - 140

Lab Sample ID: LCSD 180-150167/3-A						Client Sample ID: Lab Control Sample Dup			
Matrix: Water						Prep Type: Total/NA			
Analysis Batch: 150322						Prep Batch: 150167			
Analyte			Spike	LCSD	LCSD				
Pentachlorophenol			Added	Result	Qualifier	Unit	D	%Rec	Limits
			5.00	4.09		ug/L	-	82	40 - 140
Surrogate									
	LCSD	LCSD							
2,4-Dichlorophenylacetic acid	%Recovery	Qualifier							Limits
	65								32 - 140

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QC Association Summary

Client: GHD Services Inc.
Project/Site: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-53946-1

GC Semi VOA

Prep Batch: 150167

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-53946-1	W-150804-TB-BG	Total/NA	Water	8151A	
LCS 180-150167/2-A	Lab Control Sample	Total/NA	Water	8151A	
LCSD 180-150167/3-A	Lab Control Sample Dup	Total/NA	Water	8151A	
MB 180-150167/1-A	Method Blank	Total/NA	Water	8151A	

Analysis Batch: 150322

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-53946-1	W-150804-TB-BG	Total/NA	Water	8151A	150167
LCS 180-150167/2-A	Lab Control Sample	Total/NA	Water	8151A	150167
LCSD 180-150167/3-A	Lab Control Sample Dup	Total/NA	Water	8151A	150167
MB 180-150167/1-A	Method Blank	Total/NA	Water	8151A	150167



Lab Chronicle

Client: GHD Services Inc.
Project/Site: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-53946-1

Client Sample ID: W-150804-TB-BG

Lab Sample ID: 240-53946-1

Date Collected: 08/04/15 11:10

Matrix: Water

Date Received: 08/05/15 09:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	8151A			150167	08/07/15 17:00	CBY	TAL PIT
Total/NA	Analysis	8151A		4	150322	08/10/15 13:34	DFE	TAL PIT

Laboratory References:

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



Certification Summary

Client: GHD Services Inc.
Project/Site: 86165-01-01, Penta Wood

TestAmerica Job ID: 240-53946-1

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

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



* Certification renewal pending - certification considered valid.

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**CHAIN OF CUSTODY
AND
RECEIVING DOCUMENTS**



240-53946 Chain of Custody



CONESTOGA-ROVERS & ASSOCIATES

3.2/ C4.2
CHAIN OF CUSTODY RECORD

1801 Old Highway 8 Northwest, Suite 114
St. Paul, Minnesota 55112 United States

Phone: (651) 639-0913 Fax: (651) 639-0923

COC NO.: **SP-01647**

PAGE 1 OF 1

(See Reverse Side for Instructions)

Project No/Phase/Task Code: 086165-01			Laboratory Name: TEST AMERICA			Lab Location: NORTH CANTON, OH			SSOW ID:						
Project Name: PENTAWOOD			Lab Contact:			Lab Quote No:			Cooler No:						
Project Location: SIREN, WI			SAMPLE TYPE			CONTAINER QUANTITY & PRESERVATION			ANALYSIS REQUESTED (See Back of COC for Definitions)						
Chemistry Contact: GRAM. ANDERSON@GHD.COM			Matrix Code (see back of COC)			Grab (G) or Comp (C)			Carrier:						
Sampler(s): TIM BRAUN												Airbill No:			
DATE (mm/dd/yy)			TIME (hh:mm)			MS/MSD Request			Date Shipped:						
SAMPLE IDENTIFICATION (Containers for each sample may be combined on one line)			Unpreserved			Hydrochloric Acid (HCl)			COMMENTS/ SPECIAL INSTRUCTIONS:						
1 W-150804-T3-BG			2			Nitric Acid (HNO ₃)			2 X						
2						Sulfuric Acid (H ₂ SO ₄)			SEC STANDARD JAT CONTACT GRAM ANDERSON						
3						Sodium Hydroxide (NaOH)									
4						Methanol/Water (Soil VOC)									
5						EnCores 3x5-g, 1x25-g									
6						Other:									
7						Total Containers/Sample									
8															
9															
10															
11															
12															
13															
14															
15															
TAT Required in business days (use separate COCs for different TATs):			Total Number of Containers: 2			Notes/ Special Requirements:									
<input type="checkbox"/> 1 Day <input type="checkbox"/> 2 Days <input type="checkbox"/> 3 Days <input type="checkbox"/> 1 Week <input type="checkbox"/> 2 Week <input checked="" type="checkbox"/> Other: 3 BE RIGHT			All Samples in Cooler must be on COC												
RELINQUISHED BY		COMPANY		DATE		TIME		RECEIVED BY		COMPANY		DATE		TIME	
1. Tim Braun		GHD		8/4/15		14:00		1. Jennell		TA-Canton		8/5/15		9:30	
2.								2.							
3.								3.							

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 #: 532146

Canton Facility

Client: GHD

Site Name

Cooler unpacked by:

Cooler Received on: 8/5/15

Opened on: 8/5/15

[Signature]

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 +1.0 °C) Observed Cooler Temp. 3.2°C Corrected Cooler Temp. 4.2°C

IR GUN# 4 (CF +0.5 °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 -1.5 °C) Observed Cooler Temp. °C Corrected Cooler Temp. °C

See Multiple Cooler Form

2. Were custody seals on the outside of the cooler(s)? If Yes Quantity Yes No

-Were custody seals on the outside of the cooler(s) signed & dated? Yes No NA

-Were custody seals on the bottle(s) or bottle kits (LLHg/MeHg)? 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. Was/were the person(s) who collected the samples clearly identified on the COC? Yes No

7. Did all bottles arrive in good condition (Unbroken)? Yes No

8. Could all bottle labels be reconciled with the COC? Yes No

9. Were correct bottle(s) used for the test(s) indicated? Yes No

10. Sufficient quantity received to perform indicated analyses? Yes No

11. Were sample(s) at the correct pH upon receipt? Yes No NA pH Strip Lot# HC432654

12. Were VOAs on the COC? Yes No

13. Were air bubbles >6 mm in any VOA vials? Yes No NA

14. Was a trip blank present in the cooler(s)? Trip Blank Lot # Yes No

Contacted PM Date by via Verbal Voice Mail Other

Concerning

14. CHAIN OF CUSTODY & SAMPLE DISCREPANCIES

Samples processed by:

Empty lines for Chain of Custody and Sample Discrepancies.

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: GHD Services Inc.

Job Number: 240-53946-1

Login Number: 53946
List Number: 2
Creator: Watson, Debbie

List Source: TestAmerica Pittsburgh
List Creation: 08/06/15 12:34 PM

Question	Answer	Comment
Radioactivity wasn't checked or is \leq 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 <math><6\text{mm}</math> (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

