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**Richard, Philip E - DNR**

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**From:** Ree, Timothy <Tim.Ree@ghd.com>  
**Sent:** Wednesday, December 16, 2015 2:54 PM  
**To:** Richard, Philip E - DNR  
**Cc:** Martin, Linda (martin.lindab@epa.gov)  
**Subject:** Penta Wood - November 2015 eDMR Long Report ~COR-086165~  
**Attachments:** 376847.pdf

Phil,

Please find a copy of the Penta Wood November 2015 eDMR (Discharge Monitoring Report) long report submitted electronically in the WDNR Web Access Management System (WAMS) today (12/16/2015).

Regards,

**Tim Ree**

**GHD**

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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: 11/01/2015 - 11/30/2015  
 Form Due Date: 12/21/2015  
 Permit Number: 0061531

Date Received:	
DOC:	353035
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	Day 1	43020		
	2	41274	0.14	<0.069
	3	41469		
	4	41350		
	5	42418		
	6	41354		
	7	41396		
	8	41207		
	9	41002		
	10	39414	0.047	
	11	41393		
	12	41177		
	13	40336		
	14	13598		
	15	0		
	16	0		
	17	22468	0.16	
	18	33846		
	19	41471		
	20	41658		
	21	41364		
	22	41113		
	23	15422		
	24	0		
	25	0		
	26	0		
	27	0		
	28	0		
	29	0		
	30	0		
	31			

	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	
<b>Summary Values</b>	<b>Monthly Avg</b>	26258.3333333333		0.115666667		0		0	
	<b>Daily Max</b>	43020		0.16		<0.069		<0.051	
	<b>Daily Min</b>	0		0.047		<0.069		<0.051	
<b>Limit(s) in Effect</b>	<b>Monthly Avg</b>			0.10	1	8	0		
<b>QA/QC Information</b>	<b>LOD</b>			0.015		0.069		0.051	
	<b>LOQ</b>			0.099*Footnote		0.22		0.1	
	<b>QC Exceedance</b>	N		N		N		N	
	<b>Lab Certification</b>			998027800		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 November 2015 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 1, 2015 discussing the non-compliance, potential cause of the non-compliance, and a corrective action.

The groundwater extraction system was shut down on November 23, 2015, as approved by the United States Environmental Protection Agency (USEPA), to begin the remediation system shutdown pilot study. The system is expected to remain temporarily shutdown through 2019 during the pilot study. If the pilot study results are favorable, WDNR will request that the USEPA authorize that the system remain shutdown permanently. If the system is required to be restarted, the corrective action will include installing new granular activated carbon into all of the treatment vessels at the facility. Subsequent compliance sample analytical data would be evaluated to assess whether other potential system adjustments are appropriate to comply with the substantive permit requirements.

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

**Laboratory Quality Control Comments**

The pentachlorophenol concentrations less than 0.099 ug/L are less than the LOQ but greater than the LOD; therefore, the concentrations were flagged with a "J" qualifier by the laboratory indicating that each concentration is an approximate value.

**Exceedence Comments**

The November 2015 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 1, 2015 discussing the non-compliance, potential cause of the non-compliance, and a corrective action.

The groundwater extraction system was shut down on November 23, 2015, as approved by the United States Environmental Protection Agency (USEPA) scheduled to begin the remediation system shutdown pilot study. The system is expected to remain temporarily shutdown through 2019 during the pilot study. If the pilot study results are favorable, WDNR will request that the USEPA authorize that the system remain shutdown permanently. If the system is required to be restarted, the corrective action will include installing new granular activated carbon into all of the treatment vessels at the facility. Subsequent compliance sample analytical data would be evaluated to assess other potential system adjustments are appropriate to comply with the substantive permit requirements.

Submitted by Timothy Ree(timdree0042) on 12/16/2015 2:49:06 PM