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January 14, 2009

Received

347192.CV.03

JAN 15 2009

REMEDICATION &
REDEVELOPMENT

Mr. William Ryan
Work Assignment Manager (SR-6J)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3507

Subject: Final 2008 Second Quarter Groundwater Report
Oconomowoc Electroplating Company, Inc. Site, Ashippun, Wisconsin
WA No. 003-LRLR-05M8, Contract No. EP-S5-06-01

Dear Mr. Ryan:

Enclosed please find for your review one CD-ROM containing the finalized 2008 Second Quarter Groundwater Report for the Oconomowoc Electroplating Company, Inc. Site. Also enclosed are two hardcopy versions of this report, as per your request. This report presents the results of the 2008 second quarter groundwater sampling event. Please contact me if you have any questions or concerns at 414-847-0437.

Sincerely,

CH2M HILL

Matt Boekenhauer
Site Manager

Enclosures

- c: Pat Vogtman, PO/USEPA, Region 5 (w/o enclosure)
- Parveen Vij, CO/USEPA, Region 5 (w/o enclosure)
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- Cherie Wilson, AA/CH2M HILL, Milwaukee

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REMEDICATION &
REDEVELOPMENT

2008 Second Quarter Groundwater Report - OECI Site Work Assignment No. 003-LRLR-05M8 / Contract No. EP-S5-06-01

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Work Assignment Manager (SR-6J)

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DATE: January 8, 2009

PROJECT NUMBER: 347192.CV.03

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JAN 15 2008

REMEDICATION &
REDEVELOPMENT

Introduction

The Oconomowoc Electroplating Company, Inc. (OECI) site is undergoing quarterly groundwater monitoring in accordance with the quality assurance project plan (QAPP) (CH2M HILL, 2004), QAPP changes letter (CH2M HILL, 2007a), and field sampling plan (FSP) (CH2M HILL, 2006).

Groundwater sampling was conducted at the OECI site during the week of April 14, 2008 at 26 monitoring wells, 10 private wells, and 1 onsite potable well. In addition, three surface water samples were collected, and water level measurements were obtained from the site monitoring wells. This report presents the results of the April 2008 second quarter sampling event and includes tables and figures to present these data.

Site Setting

The 10-acre OECI site comprises the former 4-acre OECI facility located at 2573 Oak Street in Ashippun, Wisconsin, and an additional 6 acres of wet, low-lying area located southwest of the facility (Figures 1 and 2). This low-lying area is referred to in historical and recent project plans as a wetland area. Davy Creek flows through this wetland area. Contaminants of concern (COCs) at this site are primarily chlorinated volatile organic compounds (CVOCs), including cis-1,2-dichloroethene (cis-1,2-DCE), trichloroethene (TCE), 1,1,1-trichloroethane (1,1,1-TCA), and vinyl chloride. Within the past year, methyl tertiary-butyl ether (MTBE) and various xylene isomers have been detected in several site wells, but these detections do not appear to be related to historical site activities.

The local geology beneath the site is comprised of Ordovician shale and dolomite bedrock overlain by Quaternary and Holocene unconsolidated deposits of sand, silt, and clay (Figure 3). Groundwater monitoring wells are installed at the site in the shallow and deep portions of the unconsolidated deposits, and within the upper bedrock. Nested wells are installed in the unconsolidated deposits, with the shallow wells monitoring the upper “water table” portion of the aquifer (shallow unconsolidated aquifer) and deeper wells monitoring the lower portion of this aquifer (deep unconsolidated aquifer). Monitoring wells are also installed in the bedrock aquifer (Figure 3). Private wells located near the site are screened in the uppermost water-bearing portions of the underlying shale and dolomite bedrock. A more detailed description of the site’s history and geology is in the 2007 *Annual Groundwater Report and Evaluation of Monitored Natural Attenuation* (CH2M HILL, 2007b).

Field Activities

The purpose of each groundwater sampling event is to monitor groundwater contaminant concentrations and natural attenuation parameters in order to assess the ongoing effectiveness of natural attenuation at the site. Parameters analyzed include alkalinity, ammonia (surface water only), chloride, dissolved gases (methane, ethane, and ethene), total and dissolved iron and manganese, nitrate, orthophosphate (surface water only), sulfate, sulfide, total organic carbon, and volatile organic compounds (VOCs). Groundwater level measurements were collected during this sampling event to assess groundwater flow directions in the shallow unconsolidated, deep unconsolidated, and bedrock aquifers.

Water Level Measurements

Depth to groundwater in 33 site monitoring wells was measured during the week of April 14, 2008. All wells, with the exception of MW-16S, had depth to water measured on April 14, 2008. Monitoring well MW-16S could not be measured until April 18, 2008 because of access issues. Depth to groundwater could not be measured in monitoring well MW-5 due to a damaged surface completion. At this time, there is no plan to replace this well due to its proximity to monitoring wells MW-103S and MW-105S. Monitoring well MW-14D is considered destroyed, and CH2M HILL has recommended replacing the well.

All water levels were measured in accordance with the FSP field operating procedure (FOP) No. 2 – *Groundwater Level Measurements* (CH2M HILL, 2006). Water levels at staff gage locations SG-2 and SG-3 along Davy Creek were not collected due to their present condition (posts supporting staff gages appear to sit at less than 90 degrees from horizontal). Staff gage SG-1 appears to have been washed away and is no longer present. While historical data collected from the staff gages were used to assist with site characterization, future information from these staff gage locations is not anticipated to enhance the characterization; therefore, staff gages SG-1, SG-2, and SG-3 will not be replaced/repared unless site characteristics change. Table 1 contains a summary of the depth to groundwater measurements and groundwater elevations for this sampling event.

Shallow Unconsolidated Aquifer

Groundwater elevations from 15 shallow monitoring wells were used to generate a water table elevation map for the shallow unconsolidated aquifer (Figure 4). The apparent groundwater flow direction in this aquifer is primarily toward Davy Creek to the south-

southwest of the site. Table 2 contains a summary of the calculated vertical gradients. Vertical gradients between the shallow and deep unconsolidated aquifers are downward at well nests MW-15 and MW-102 upland from the wetland area and Davy Creek, and upward at well nests located to the south and east of the site, within (or proximal to) the wetland area and near Davy Creek (MW-12, MW-13, MW-102, MW-103, MW-105, MW-106, and MW-107). Vertical gradients between the unconsolidated aquifer and bedrock vary across the site, with a downward gradient at well nests MW-3, MW-4, MW-15, and MW-105, and slight upward gradients at well nests MW-1, MW-12, and MW-101.

Deep Unconsolidated Aquifer

Groundwater elevations from 10 deep monitoring wells were used to generate a potentiometric surface map for the deep unconsolidated aquifer (Figure 5). The apparent groundwater flow direction in the deep unconsolidated aquifer is toward Davy Creek to the southwest. Vertical gradients between the deep unconsolidated aquifer and bedrock vary across the site, with downward gradients at the MW-15 and MW-105 nests, and an upward gradient at nest MW-12 (located within the wetland area near Davy Creek).

Bedrock Aquifer

Groundwater elevations from eight bedrock monitoring wells were used to generate a potentiometric surface map for the bedrock aquifer (Figure 6). The apparent groundwater flow direction in the bedrock is generally to the west and southwest. Bedrock groundwater elevations appear to be the highest directly beneath and upgradient from the area of the former facility. The residential subdivision west of the site includes a number of actively pumped private wells that may contribute to the horizontal gradient toward the west.

Sampling Activities and Results

Sampling and analyses were completed in accordance with the FSP (CH2M HILL, 2006). All wells were purged and sampled as described in FOP No. 1 – *Low Flow Groundwater Sampling Procedures* (CH2M HILL, 2006). Groundwater field parameters were monitored with a multimeter during well purging. The wells were purged continuously until monitored field parameters stabilized within the limits specified in FOP No. 1. Samples were collected immediately following the stabilization of groundwater field parameters. Procedures for field filtering groundwater samples were followed according to FOP No. 5 – *Field Filtering Samples* (CH2M HILL, 2006). Samples were processed, packaged, and shipped to the laboratory on the day of collection. Between each sampling location, all nondedicated sampling equipment was decontaminated following FOP No. 6 – *Field Sampling Equipment Decontamination* (CH2M HILL, 2006).

Private well locations were sampled as part of the second quarter April 2008 compliance monitoring in accordance with FOP No. 10 – *Private Residential Well Groundwater Sampling Procedures* (CH2M HILL, 2006), with the exception of field parameter collection. Due to the variable nature of access points for private well sampling and the various treatment sequences of these wells, field parameters cannot be used as an indication of proper purging prior to sample collection. Private well taps were opened for 10 to 15 minutes prior to sampling. Whenever the configuration of the water system allowed, the sample was collected from a spigot before water-conditioning equipment was used.

Monitoring Well Results

Groundwater from 22 monitoring wells was collected and sampled for natural attenuation and regulatory compliance parameters (VOCs). Groundwater was collected from four monitoring “sentinel” wells (MW-106S/D and MW-107S/D) and analyzed for regulatory compliance parameters only (VOCs). Table 3 summarizes the results from the groundwater collected at these monitoring wells.

Figures 7 through 12 present the distribution and magnitude of site COC concentrations within each aquifer unit, relative to Wisconsin Administrative Code NR 140 preventive action limits (PAL) and enforcement standards (ES). Specifically, Figures 7, 9, and 11 depict the distribution and concentrations of CVOC “parent” compounds – 1,1,1-TCA (TCA); tetrachloroethene (PCE); and TCE. Figures 8, 10, and 12 depict the distribution and concentrations of common degradation products or “daughter” compounds for these parent compounds – cis-1,2-DCE and vinyl chloride.

Unconsolidated Monitoring Wells

Groundwater PAL and ES exceedances of COCs in groundwater from the shallow unconsolidated aquifer are present for both parent and daughter compounds at four monitoring well locations: MW-12S, MW-103S, and MW-105S (Figures 7 and 8). Groundwater collected at MW-16S was found to have exceedances for daughter compounds, but no detections of any parent compounds. Groundwater PAL and ES exceedances of COCs in groundwater from the deep unconsolidated aquifer are slightly more widespread (Figures 9 and 10). PAL or ES exceedances are present for both parent and daughter compounds at MW-102D (PAL only) west of the site, and at MW-5D, MW-12D, MW-103D, and MW-105D immediately downgradient from the site. There is also a single ES exceedance for TCE at MW-15D, west of the site, and a downgradient PAL exceedance for VC at MW-13D. A number of these exceedances are due to elevated laboratory detection limits caused by sample dilution.

Groundwater collected from sentinel well nests MW-106S/D and MW-107S/D contained no VOC detections during the April 2008 sampling event, with the exception of unconfirmed (not detected in consecutive sampling events) low-level detections of acetone at MW-106S and MW-107S. Acetone is a known laboratory contaminant, and is not believed to be attributable to historic site activities at this time.

Bedrock Monitoring and Private Wells

The bedrock aquifer includes bedrock monitoring wells and private wells, screened at various depths. Bedrock monitoring wells at the site are screened in the upper 5 to 10 feet of the bedrock. Private wells are screened within a wider range of depths, as they are typically drilled to a depth where they intersect a significant water-bearing fracture or joint.

Groundwater collected at bedrock monitoring well MW-1D contained vinyl chloride concentrations that exceed the PAL. MW-1D is located east of the former facility. In all other bedrock monitoring wells, no COCs were identified that exceed the PAL or ES. Figures 11 and 12 show the distribution and magnitude of the detections of site COCs in bedrock.

Groundwater from 10 private wells and 1 onsite potable well was collected and sampled for regulatory compliance parameters (VOCs). Table 4 contains a summary of the results from

the samples collected at these wells. Vinyl chloride was detected at concentrations exceeding the PAL (0.020 micrograms per liter [$\mu\text{g}/\text{L}$]) at two private wells (PW-07 and PW-09, with groundwater concentrations of 0.065 and 0.058 $\mu\text{g}/\text{L}$, respectively). TCE was detected at a concentration of 0.54 $\mu\text{g}/\text{L}$, exceeding the PAL of 0.5 $\mu\text{g}/\text{L}$ in groundwater collected from PW-03. Wells PW-03, PW-07, and PW-09 are on the downgradient/western side of the OECl site. No other COCs were identified that exceed the PAL or ES in the private wells; however, 1,2-dichloroethane (1,2-DCA); cis-1,2-DCE; MTBE; trans-1,2-DCE; and TCE also were detected at low levels in groundwater collected from several private wells at concentrations below the PAL. Over the past several sampling rounds, MTBE and various xylene isomers have been detected in several site wells. However, these detections do not appear to be related to the site because they have been previously detected in several upgradient wells and these compounds were not part of historic site activities.

Natural Attenuation Parameters

The concentrations of analytical natural attenuation and field parameters collected indicate that natural attenuation continues to occur most favorably in the shallow and deep unconsolidated wells located in or just upgradient of the wetland. This is evidenced by favorable oxidation-reduction potential conditions and elevated concentrations of sulfate, chloride, dissolved gases, and total/dissolved iron and manganese. A further assessment of the natural attenuation and VOC concentrations across the site will be provided in the next annual report, which will be generated following completion of the first quarter 2009 sampling round.

Surface Water Results

Surface water from three locations along Davy Creek (SG-01, SG-02, and SG-03) was collected and analyzed for natural attenuation (including ammonia and orthophosphate) and regulatory compliance parameters (VOCs). Table 5 contains a summary of the results from the samples collected at these locations. Several site-related COCs were detected in the surface water collected at SG-02 and SG-03 during the April 2008 sampling event.

Surface water collected at SG-02 contained VOC detections of 1,1-dichloroethane, 1,1-dichloroethene, acetone, benzene, chlorobenzene, chloroethane, cis-1,2-DCE, toluene, trans-1,2-DCE, TCA, TCE, and VC. Surface water collected at SG-03 contained VOC detections of TCA, cis-1,2-DCE, and TCE. The detections of acetone, benzene, chlorobenzene, chloroethane, toluene, and VC are all unconfirmed. Detections of TCA, cis-1,2-DCE, and TCE were found in surface water collected at locations at SG-02 and SG-03 are confirmed from the January 2008 sampling event (detections were found in consecutive sampling events). Surface water collected at upstream location SG-01 had no VOC detections during the April 2008 sampling event.

Previous detections of COCs found in surface water at SG-03 were not thought to have originated from the site for two reasons. As stated in the 2007 *Annual Groundwater Report and Evaluation of Monitored Natural Attenuation* (CH2M HILL 2007b), (1) these VOCs would not be expected to persist in a flowing surface water body and be detected 500 to 1,000 feet downgradient from the site, and (2) this suite of VOCs has not been detected in the groundwater sentinel wells. However, the April 2008 surface water results confirmed the VOC data collected at SG-02 and SG-03 in January 2008, and previous assumptions may no

longer hold true. The presence of upward vertical gradients in the area of Davy Creek and the wetland, coupled with the concentration of COCs (particularly daughter compounds) in the shallow aquifer, make the potential for the discharge of site COCs to the surface water near SG-02, and then move downstream to SG-03 appear possible. Monitoring at all three surface water locations will continue and results and trends will be evaluated when additional quarterly data has been collected.

Data Management

U.S. Environmental Protection Agency (USEPA) software Forms II Lite 5.1 was used in the field to enter field sample data and create chain-of-custody forms. The USEPA copies of the chain-of-custody forms were used to enter sample information into the sample tracking spreadsheet. Upon receipt of the samples, the laboratory transmitted an electronic sample receipt to CH2M HILL, which was then compared to the chain-of-custody and entered into the sample tracking spreadsheet. On May 1, 2008, the laboratory provided CH2M HILL with electronic data deliverables (EDD), including one hard copy package, and a portable document format (PDF) electronic file of the data package. This first set of laboratory data was sent to USEPA for validation on May 16, 2008. Following USEPA data validation, a CH2M HILL project chemist reviewed the validation summaries, and the qualifiers were entered into the EQulS database for use in this quarterly groundwater report. CH2M HILL's data usability memorandum for the April 2008 data is included in Appendix A.

Summary and Recommendations

The 2008 second quarter sampling event was conducted at the OECI site during the week of April 14, 2008. Twenty-six monitoring wells, ten private wells, one onsite potable well, and surface water from three locations were sampled during this event. Groundwater elevations determined from water level measurements collected at site monitoring wells indicate that the apparent groundwater flow direction in the shallow and deep unconsolidated aquifers is toward Davy Creek to the southwest. Groundwater elevations in the bedrock aquifer indicate that the apparent groundwater flow direction is to the west and southwest, toward the residential subdivision where the upper bedrock aquifer is actively pumped by private wells.

Groundwater analytical results indicate that COCs are present across the site at concentrations exceeding the PAL and/or ES. Although the overall favorability of natural attenuation has decreased, conditions exist to support that natural attenuation continues to occur. PAL and ES exceedances of COCs in the shallow and deep unconsolidated aquifers are located directly adjacent to the facility (MW-5D, MW-103S, and MW-103D), immediately downgradient to the southwest (MW-12S, MW-12D, MW-13D, MW-16S, MW-105S, and MW-105D), or crossgradient to the west (MW-15D and MW-102D). In the bedrock aquifer, groundwater at one monitoring well and two private well locations contain vinyl chloride concentrations that exceed the PAL (upgradient well MW-1D, and private wells PW-07 and PW-09). Groundwater from private well PW-03 exceeds the PAL for TCE. In the bedrock aquifer, no other COCs were identified that exceed the PAL (no COCs exceed the ES). However, 1,2-DCA; cis-1,2-DCE; MTBE; trans-1,2-DCE; and TCE were detected in several private wells at concentrations below the PAL. Over the past several sampling rounds,

MTBE and various xylene isomers have been detected in several site wells, but these detections do not appear to be related to the site, because they have been found previously in several upgradient wells and these compounds were not part of historic site activities.

Surface water from three locations along Davy Creek (SG-01, SG-02, and SG-03) was collected during the April 2008 sampling event. Confirmed detections of TCA, cis-1,2-DCE, and TCE were found in surface water collected at locations SG-02 and SG-03. The presence of upward vertical gradients in the area of Davy Creek and the wetland, coupled with the known high concentration of COCs (particularly daughter compounds) in the shallow aquifer, make the potential for the discharge of site COCs to the surface water near SG-02, and then move downstream to SG-03 appear likely. Surface water collected at upstream location SG-01 had no VOC detections during the April 2008 sampling event. Monitoring at all three surface water locations will continue and results and trends will be evaluated when additional quarterly data has been collected.

Monitoring well MW-14D is considered destroyed, and CH2M HILL has recommended replacing the well. CH2M HILL recommends that site monitoring continue under the current sampling plan for natural attenuation and regulatory compliance parameters at the selected monitoring wells, private wells, and surface water sampling points. The next quarterly monitoring event is scheduled for July 2008.

References

CH2M HILL. 2004. *Quality Assurance Project Plan, Oconomowoc Electroplating, Oconomowoc, Wisconsin*. WA No. 236-RALR-05M8, Contract No. 68-W6-0025.

CH2M HILL. 2006. *Field Sampling Plan, Oconomowoc Electroplating, Oconomowoc, Wisconsin*. WA No. 003-LRLR-05MS, Contract No. EP-SS-06-01. December.

CH2M HILL. 2007a. *Quality Assurance Project Plan Changes, Oconomowoc Electroplating, Ashippun, Wisconsin, Long Term Remedial Action*. WA No. 003-LRLR-05MS, Contract No. EP-SS-06-01. January.

CH2M HILL. 2007b. *Annual Groundwater Report and Evaluation of Monitored Natural Attenuation*. WA No. 003-LRLR-05MS, Contract No. EP-SS-06-01. May.

Tables

TABLE 1

Groundwater Elevations--April 2008
 2008 2nd Quarter Groundwater Report
 OECl Site

| Well ID | Hydrogeologic Unit Screened | Top of Casing (TOC) | Groundwater Depth | Groundwater Elevation |
|---------------------|-----------------------------|---------------------|--------------------------------|-----------------------|
| | | Elevation (ft amsl) | April 2008 (measured from TOC) | April 2008 (ft amsl) |
| MW-1S | Shallow Unconsolidated | 853.42 | 4.72 | 848.70 |
| MW-1D | Upper Bedrock | 853.14 | 4.15 | 848.99 |
| MW-2D | Upper Bedrock | 852.36 | 3.65 | 848.71 |
| MW-3S | Shallow Unconsolidated | 853.39 | 4.23 | 849.16 |
| MW-3D | Upper Bedrock | 853.51 | 5.73 | 847.78 |
| MW-4S | Shallow Unconsolidated | 854.58 | 5.30 | 849.28 |
| MW-4D | Upper Bedrock | 854.63 | 5.89 | 848.74 |
| MW-5 | Shallow Unconsolidated | 849.07 | Broken | -- |
| MW-5D | Deep Unconsolidated | 848.80 | 1.51 | 847.29 |
| MW-9S | Shallow Unconsolidated | 851.57 | 4.16 | 847.41 |
| MW-12S | Shallow Unconsolidated | 849.17 | 3.10 | 846.07 |
| MW-12D | Deep Unconsolidated | 848.31 | 1.17 | 847.14 |
| MW-12B | Upper Bedrock | 849.40 | 2.12 | 847.28 |
| MW-13S | Shallow Unconsolidated | 850.91 | 4.02 | 846.89 |
| MW-13D | Deep Unconsolidated | 850.02 | 2.89 | 847.13 |
| MW-15S | Shallow Unconsolidated | 854.68 | 6.40 | 848.28 |
| MW-15D | Deep Unconsolidated | 855.30 | 7.68 | 847.62 |
| MW-15B | Upper Bedrock | 854.35 | 14.88 | 839.47 |
| MW-16S ¹ | Shallow Unconsolidated | 847.90 | 2.30 | 845.60 |
| MW-101S | Shallow Unconsolidated | 851.24 | 2.11 | 849.13 |
| MW-101B | Upper Bedrock | 851.08 | 3.01 | 848.07 |
| MW-102S | Shallow Unconsolidated | 853.65 | 5.85 | 847.80 |
| MW-102D | Deep Unconsolidated | 853.70 | 5.96 | 847.74 |
| MW-103S | Shallow Unconsolidated | 851.84 | 4.45 | 847.39 |
| MW-103D | Deep Unconsolidated | 851.97 | 4.54 | 847.43 |
| MW-104S | Shallow Unconsolidated | 850.56 | 3.35 | 847.21 |
| MW-104D | Deep Unconsolidated | 850.57 | 3.24 | 847.33 |
| MW-105S | Shallow Unconsolidated | 849.01 | 2.76 | 846.25 |
| MW-105D | Deep Unconsolidated | 848.90 | 1.75 | 847.15 |
| MW-105B | Upper Bedrock | 848.90 | 1.78 | 847.12 |
| MW-106S | Shallow Unconsolidated | 848.92 | 2.66 | 846.26 |
| MW-106D | Deep Unconsolidated | 849.01 | 1.74 | 847.27 |
| MW-107S | Shallow Unconsolidated | 848.66 | 2.36 | 846.30 |
| MW-107D | Deep Unconsolidated | 848.64 | 1.56 | 847.08 |

ft amsl = feet above mean sea level

¹MW-16S depth to groundwater collected 4/18/2008; all other groundwater depths collected 4/14/2008.

TABLE 2

Vertical Gradient Summary - April 2008
 2008 2nd Quarter Groundwater Report
 OECl Site

| Well Nest | Screen Midpoint Shallow | Screen Midpoint Deep | Screen Midpoint Bedrock | GW Elev. Shallow - April 2008 | GW Elev. Deep - April 2008 | Unconsolidated (Shallow to Deep) Vertical Gradient (ft/ft) | GW Elev. Unconsolidated - April 2008 | GW Elev. Bedrock - April 2008 | Unconsolidated to Bedrock Vertical Gradient (ft/ft) |
|-----------|-------------------------|----------------------|-------------------------|-------------------------------|----------------------------|--|--------------------------------------|-------------------------------|---|
| 1 | 842.62 | | 806.04 | | | | 848.70 | 848.99 | -0.008 |
| 3 | 844.59 | | 810.51 | | | | 849.16 | 847.78 | 0.040 |
| 4 | 844.78 | | 809.73 | | | | 849.28 | 848.74 | 0.015 |
| 5 | 841.07 | 825.30 | | | 847.29 | NA | | | |
| 12 | 841.17 | 827.81 | 810.90 | 846.07 | 847.14 | -0.080 | 847.14 | 847.28 | -0.008 |
| 13 | 842.91 | 823.52 | | 846.89 | 847.13 | -0.012 | | | |
| 15 | 843.18 | 818.30 | 799.35 | 848.28 | 847.62 | 0.027 | 847.62 | 839.47 | 0.430 |
| 101 | 843.24 | | 804.58 | | | | 849.13 | 848.07 | -0.001 |
| 102 | 842.65 | 807.20 | | 847.80 | 847.74 | 0.002 | | | |
| 103 | 842.84 | 830.47 | | 847.39 | 847.43 | -0.003 | | | |
| 104 | 840.56 | 825.07 | | 847.21 | 847.33 | -0.008 | | | |
| 105 | 841.01 | 824.40 | 807.40 | 846.25 | 847.15 | -0.054 | 847.15 | 847.12 | 0.002 |
| 106 | 838.92 | 797.51 | | 846.26 | 847.27 | -0.024 | | | |
| 107 | 835.62 | 818.24 | | 846.30 | 847.08 | -0.045 | | | |

Note: Negative values for vertical gradients indicate upward movement. Positive values indicate downward movement.

NA = Not Available

All elevations in feet above mean sea level

TABLE 3
Monitoring Well Field and Analytical Results—April 2008
2008 2nd Quarter Groundwater Report
OECl Site

| Constituent | Units | WAC NR 140 PAL | WAC NR 140 ES | MW-106S 08CE12-72 | MW-106D 08CE12-71 | MW-107S 08CE12-85 | MW-107D 08CE12-84 |
|---------------------------------------|------------|----------------|---------------|----------------------|----------------------|----------------------|----------------------|
| Field Parameters | | | | | | | |
| Dissolved Oxygen (DO) | mg/L | | | 0.49 | 0.19 | 0.47 | 0.47 |
| Oxidation Reduction Potential (ORP) | millivolts | | | -96.7 | -85.2 | -100.6 | -89.2 |
| pH | pH units | | | 7.21 | 6.97 | 7.3 | 7.21 |
| Specific Conductivity | mmhos/cm | | | 0.886 | 1.135 | 0.761 | 1.115 |
| Temperature | deg c | | | 9.98 | 10.50 | 7.91 | 9.08 |
| Depth to water | feet | | | 2.66 | 1.74 | 2.36 | 1.56 |
| Natural Attenuation Parameters | | | | | | | |
| Alkalinity, total (as CaCO3) | mg/L | N/A | N/A | | | | |
| Chloride (as Cl) | mg/L | 125 | 250 | | | | |
| Ethane | µg/L | N/A | N/A | | | | |
| Ethene | µg/L | N/A | N/A | | | | |
| Iron, total | µg/L | 150 | 300 | | | | |
| Iron, dissolved | µg/L | 150 | 300 | | | | |
| Manganese, total | µg/L | 25 | 50 | | | | |
| Manganese, dissolved | µg/L | 25 | 50 | | | | |
| Methane | µg/L | N/A | N/A | | | | |
| Nitrogen, nitrate (as N) | mg/L | 2 | 10 | | | | |
| Sulfate (as SO4) | mg/L | 125 | 250 | | | | |
| Sulfide | mg/L | N/A | N/A | | | | |
| Total Organic Carbon | mg/L | N/A | N/A | | | | |
| VOCs | | | | | | | |
| 1,1,1-Trichloroethane | µg/L | 40 | 200 | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,1,2,2-Tetrachloroethane | µg/L | 0.02 | 0.2 | 0.019 U | 0.019 U | 0.019 U | 0.019 U |
| 1,1,2-Trichloroethane | µg/L | 0.5 | 5 | 0.06 U | 0.06 U | 0.06 U | 0.06 U |
| 1,1-Dichloroethane | µg/L | 85 | 850 | 0.06 U | 0.06 U | 0.06 U | 0.06 U |
| 1,1-Dichloroethene | µg/L | 0.7 | 7 | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,2,3-Trichlorobenzene | µg/L | N/A | N/A | 0.07 U | 0.07 U | 0.07 U | 0.07 U |
| 1,2,4-Trichlorobenzene | µg/L | 14 | 70 | 0.06 U | 0.06 U | 0.06 U | 0.06 U |
| 1,2-Dibromo-3-chloropropane | µg/L | 0.02 | 0.2 | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,2-Dibromoethane | µg/L | 0.5 | 5 | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,2-Dichlorobenzene | µg/L | 60 | 600 | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,2-Dichloroethane | µg/L | 0.5 | 5 | 0.03 U | 0.03 U | 0.03 U | 0.03 U |
| 1,2-Dichloropropane | µg/L | 0.5 | 5 | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,3-Dichlorobenzene | µg/L | 125 | 1,250 | 0.027 U | 0.027 U | 0.027 U | 0.027 U |
| 1,4-Dichlorobenzene | µg/L | 15 | 75 | 0.04 U | 0.04 U | 0.04 U | 0.04 U |
| 2-Butanone | µg/L | N/A | N/A | 0.6 U | 0.6 U | 0.6 U | 0.6 U |
| 2-Hexanone | µg/L | N/A | N/A | 1.6 U | 1.6 U | 1.6 U | 1.6 U |
| 4-Methyl-2-pentanone | µg/L | N/A | N/A | 0.8 U | 0.8 U | 0.8 U | 0.8 U |
| Acetone | µg/L | 200 | 1,000 | 2.1 J | 1.5 U | 1.7 J | 1.5 U |
| Benzene | µg/L | 0.5 | 5 | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| Bromochloromethane | µg/L | N/A | N/A | 0.028 U | 0.028 U | 0.028 U | 0.028 U |
| Bromodichloromethane | µg/L | 0.06 | 0.6 | 0.03 U | 0.03 U | 0.03 U | 0.03 U |
| Bromoform | µg/L | 0.44 | 4.4 | 0.04 U | 0.04 U | 0.04 U | 0.04 U |
| Bromomethane | µg/L | 1 | 10 | 0.07 U | 0.07 U | 0.07 U | 0.07 U |
| Carbon disulfide | µg/L | 200 | 1,000 | 0.09 U | 0.09 U | 0.09 U | 0.09 U |
| Carbon tetrachloride | µg/L | 0.5 | 5 | 0.022 U | 0.022 U | 0.022 U | 0.022 U |
| Chlorobenzene | µg/L | N/A | N/A | 0.04 U | 0.04 U | 0.04 U | 0.04 U |
| Chloroethane | µg/L | 80 | 400 | 0.07 U | 0.07 U | 0.07 U | 0.07 U |
| Chloroform | µg/L | 0.6 | 6 | 0.022 U | 0.022 U | 0.022 U | 0.022 U |
| Chloromethane | µg/L | 0.3 | 3 | 0.05 U | 0.05 U | 0.17 U | 0.17 U |
| cis-1,2-Dichloroethene | µg/L | 7 | 70 | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| cis-1,3-Dichloropropene | µg/L | 0.02 | 0.2 | 0.017 U | 0.017 U | 0.017 U | 0.017 U |
| Dibromochloromethane | µg/L | 6 | 60 | 0.026 U | 0.026 U | 0.026 U | 0.026 U |
| Dichlorodifluoromethane | µg/L | 200 | 1,000 | 0.03 U | 0.03 U | 0.03 U | 0.03 U |
| Ethylbenzene | µg/L | 140 | 700 | 0.024 U | 0.024 U | 0.024 U | 0.024 U |
| Isopropylbenzene | µg/L | N/A | N/A | 0.04 U | 0.04 U | 0.04 U | 0.04 U |
| m,p,-Xylene (sum of isomers) | µg/L | 1,000 | 10,000 | 0.08 U | 0.08 U | 0.08 U | 0.08 U |
| Methyl tert-butyl ether | µg/L | 12 | 60 | 0.08 U | 0.08 U | 0.08 U | 0.08 U |
| Methylene chloride | µg/L | 0.5 | 5 | 0.18 UJ | 0.18 UJ | 0.18 UJ | 0.18 UJ |
| o-Xylene | µg/L | N/A | N/A | 0.023 U | 0.023 U | 0.023 U | 0.023 U |
| Styrene | µg/L | 10 | 100 | 0.022 U | 0.022 U | 0.022 U | 0.022 U |
| Tetrachloroethene | µg/L | 0.5 | 5 | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| Toluene | µg/L | 200 | 1,000 | 0.06 U | 0.06 U | 0.06 U | 0.06 U |
| trans-1,2-Dichloroethene | µg/L | 20 | 100 | 0.06 U | 0.06 U | 0.06 U | 0.06 U |
| trans-1,3-Dichloropropene | µg/L | 0.02 | 0.2 | 0.017 U | 0.017 U | 0.017 U | 0.017 U |
| Trichloroethene | µg/L | 0.5 | 5 | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| Vinyl chloride | µg/L | 0.02 | 0.2 | 0.013 U | 0.013 U | 0.013 U | 0.013 U |

J indicates that the value was between the method detection limit and the limit of quantitation and, therefore, is estimated.

U indicates that the constituent was not detected above the method detection limit.

UJ indicates that the constituent was not detected above the estimated method detection limit.

UB indicates that the constituent is considered to be below the detection limit listed due to blank contamination.

Bolded values indicate attainment or exceedance of the Wisconsin Administrative Code (WAC) NR 140 Preventive Action Limit (PAL).

Shaded values indicate attainment or exceedance of the Wisconsin Administrative Code (WAC) NR 140 Enforcement Standard (ES).

TABLE 4
Private Well Analytical Results—April 2008
2008 2nd Quarter Groundwater Report
OEC/ Site

| Constituent | Units | WAC NR 140 PAL | WAC NR 140 ES | PW-01 08CE12-10 | PW-02 08CE12-73 | PW-03 08CE12-60 | PW-04 08CE12-62 | PW-05 08CE12-46 | PW-07 08CE12-67 | PW-08 08CE12-29 | PW-09 08CE12-61 | PW-10 08CE12-30 | PW-11 08CE12-45 | DW-01 08CE12-44 |
|------------------------------|-------|----------------|---------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| VOCs | | | | | | | | | | | | | | |
| 1,1,1-Trichloroethane | µg/L | 40 | 200 | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,1,2,2-Tetrachloroethane | µg/L | 0.02 | 0.2 | 0.019 U | 0.019 U | 0.019 U | 0.019 U | 0.019 U | 0.019 U | 0.019 U | 0.019 U | 0.019 U | 0.019 U | 0.019 U |
| 1,1,2-Trichloroethane | µg/L | 0.5 | 5 | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U |
| 1,1-Dichloroethane | µg/L | 85 | 850 | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U |
| 1,1-Dichloroethene | µg/L | 0.7 | 7 | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,2,3-Trichlorobenzene | µg/L | N/A | N/A | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U |
| 1,2,4-Trichlorobenzene | µg/L | 14 | 70 | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U |
| 1,2-Dibromo-3-chloropropane | µg/L | 0.02 | 0.2 | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,2-Dibromoethane | µg/L | 0.5 | 5 | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,2-Dichlorobenzene | µg/L | 60 | 600 | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,2-Dichloroethane | µg/L | 0.5 | 5 | 0.25 | 0.03 U | 0.049 J | 0.03 U | 0.03 U | 0.049 J | 0.03 U | 0.057 J | 0.03 U | 0.03 U | 0.03 U |
| 1,2-Dichloropropane | µg/L | 0.5 | 5 | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| 1,3-Dichlorobenzene | µg/L | 125 | 1,250 | 0.027 U | 0.027 U | 0.027 U | 0.027 U | 0.027 U | 0.027 U | 0.027 U | 0.027 U | 0.027 U | 0.027 U | 0.027 U |
| 1,4-Dichlorobenzene | µg/L | 15 | 75 | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U |
| 2-Butanone | µg/L | N/A | N/A | 0.6 U | 0.6 U | 0.6 U | 0.6 U | 0.6 U | 0.6 U | 0.6 U | 0.6 U | 0.6 U | 0.6 U | 0.6 U |
| 2-Hexanone | µg/L | N/A | N/A | 1.6 U | 1.6 U | 1.6 U | 1.6 U | 1.6 U | 1.6 U | 1.6 U | 1.6 U | 1.6 U | 1.6 U | 1.6 U |
| 4-Methyl-2-pentanone | µg/L | N/A | N/A | 0.8 U | 0.8 U | 0.8 U | 0.8 U | 0.8 U | 0.8 U | 0.8 U | 0.8 U | 0.8 U | 0.8 U | 0.8 U |
| Acetone | µg/L | 200 | 1,000 | 1.5 U | 1.5 U | 1.5 U | 1.5 U | 1.5 U | 1.5 J | 1.5 U | 1.5 U | 1.5 U | 1.5 U | 1.5 U |
| Benzene | µg/L | 0.5 | 5 | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| Bromochloromethane | µg/L | N/A | N/A | 0.028 U | 0.028 U | 0.028 U | 0.028 U | 0.028 U | 0.028 U | 0.028 U | 0.028 U | 0.028 U | 0.028 U | 0.028 U |
| Bromodichloromethane | µg/L | 0.06 | 0.6 | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U |
| Bromoform | µg/L | 0.44 | 4.4 | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U |
| Bromomethane | µg/L | 1 | 10 | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U |
| Carbon disulfide | µg/L | 200 | 1,000 | 0.09 U | 0.12 J | 0.09 U | 0.09 U | 0.09 U | 0.09 U | 0.09 U | 0.09 U | 0.09 U | 0.09 U | 0.09 U |
| Carbon tetrachloride | µg/L | 0.5 | 5 | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U |
| Chlorobenzene | µg/L | N/A | N/A | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U |
| Chloroethane | µg/L | 80 | 400 | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U | 0.07 U |
| Chloroform | µg/L | 0.6 | 6 | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.13 U | 0.022 U | 0.022 U | 0.022 U |
| Chloromethane | µg/L | 0.3 | 3 | 0.05 U | 0.05 U | 0.17 U | 0.17 U | 0.05 U | 0.17 U | 0.17 U | 0.17 U | 0.05 U | 0.05 U | 0.05 U |
| cis-1,2-Dichloroethene | µg/L | 7 | 70 | 0.05 U | 0.05 U | 0.76 | 0.88 | 0.78 | 4.9 | 1.6 | 5.5 J | 0.05 U | 0.62 | 0.05 U |
| cis-1,3-Dichloropropene | µg/L | 0.02 | 0.2 | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U |
| Dibromochloromethane | µg/L | 6 | 60 | 0.026 U | 0.026 U | 0.026 U | 0.026 U | 0.026 U | 0.026 U | 0.026 U | 0.026 U | 0.026 U | 0.026 U | 0.026 U |
| Dichlorodifluoromethane | µg/L | 200 | 1,000 | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U | 0.03 U |
| Ethylbenzene | µg/L | 140 | 700 | 0.024 U | 0.024 U | 0.024 U | 0.024 U | 0.024 U | 0.024 U | 0.024 U | 0.024 U | 0.024 U | 0.024 U | 0.024 U |
| Isopropylbenzene | µg/L | N/A | N/A | 0.04 U | 0.088 J | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U | 0.04 U |
| m,p,-Xylene (sum of isomers) | µg/L | 1,000 | 10,000 | 0.08 U | 0.14 U | 0.08 U | 0.08 U | 0.08 U | 0.08 U | 0.08 U | 0.08 UJ | 0.08 U | 0.08 U | 0.08 U |
| Methyl tert-butyl ether | µg/L | 12 | 60 | 0.08 U | 0.08 U | 0.64 | 0.5 | 0.83 | 0.87 | 0.75 | 0.93 | 0.3 | 0.91 | 0.08 U |
| Methylene chloride | µg/L | 0.5 | 5 | 0.18 UJ | 0.18 UJ | 0.18 UJ | 0.18 UJ | 0.18 UJ | 0.18 UJ | 0.18 UJ | 0.18 UJ | 0.18 UJ | 0.18 UJ | 0.18 UJ |
| o-Xylene | µg/L | N/A | N/A | 0.023 U | 0.21 | 0.023 U | 0.023 U | 0.023 U | 0.023 U | 0.023 U | 0.023 UJ | 0.023 U | 0.023 U | 0.023 U |
| Styrene | µg/L | 10 | 100 | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 U | 0.022 R | 0.022 U | 0.022 U | 0.022 U |
| Tetrachloroethene | µg/L | 0.5 | 5 | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| Toluene | µg/L | 200 | 1,000 | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U | 0.06 U |
| trans-1,2-Dichloroethene | µg/L | 20 | 100 | 0.06 U | 0.06 U | 0.074 J | 0.099 J | 0.071 J | 0.36 | 0.11 J | 0.37 | 0.06 U | 0.071 J | 0.06 U |
| trans-1,3-Dichloropropene | µg/L | 0.02 | 0.2 | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U | 0.017 U |
| Trichloroethene | µg/L | 0.5 | 5 | 0.05 U | 0.05 U | 0.54 | 0.057 J | 0.1 J | 0.055 J | 0.11 J | 0.083 J | 0.05 U | 0.05 U | 0.05 U |
| Vinyl chloride | µg/L | 0.02 | 0.2 | 0.013 U | 0.013 U | 0.013 U | 0.013 U | 0.013 U | 0.065 | 0.013 U | 0.058 J | 0.013 U | 0.013 U | 0.013 U |

J indicates that the value was between the method detection limit and the limit of quantitation and, therefore, is estimated.

U indicates that the constituent was not detected above the method detection limit.

UJ indicates that the constituent was not detected above the estimated method detection limit.

UB indicates that the constituent is considered to be below the detection limit listed due to blank contamination.

Bolded values indicate attainment or exceedance of the Wisconsin Administrative Code (WAC) NR 140 Preventive Action Limit (PAL).

Shaded values indicate attainment or exceedance of the Wisconsin Administrative Code (WAC) NR 140 Enforcement Standard (ES).

TABLE 5

Private Well Analytical Results—April 2008
2008 2nd Quarter Groundwater Report
OECI Site

| Constituent | Units | SW-01 08CE12-17, 18 | SW-02 08CE12-89, 90 | SW-03 08CE12-65, 66 |
|---|-------|------------------------|------------------------|------------------------|
| Natural Attenuation Parameters | | | | |
| Alkalinity, total (as CaCO ₃) | mg/L | 220 | 350 | 260 |
| Chloride (as Cl) | mg/L | 22 | 190 | 31 |
| Ethane | µg/L | 0.4 U | 0.4 U | 0.4 U |
| Ethene | µg/L | 0.5 U | 0.5 U | 0.5 U |
| Iron, total | µg/L | 100 J | 790 | 136 J |
| Iron, dissolved | µg/L | 81 J | 94 J+ | 58 J |
| Manganese, total | µg/L | 4 UJ | 78 | 4.2 J+ |
| Manganese, dissolved | µg/L | 4 J+ | 81 | 2.8 J+ |
| Methane | µg/L | 0.69 J | 52 | 1.4 J |
| Nitrogen, ammonia (as N) | mg/L | 0.08 U | 0.08 U | 0.08 U |
| Nitrogen, nitrate (as N) | mg/L | 1.2 | 0.49 | 0.65 |
| Phosphorus, total | mg/L | 0.14 U | 0.14 U | 1.4 U |
| Sulfate (as SO ₄) | mg/L | 14 | 59 | 16 |
| Sulfide | mg/L | 1 U | 1 U | 1 U |
| Total Organic Carbon | mg/L | 13 | 7.5 J | 13 |
| VOCs | | | | |
| 1,1,1-Trichloroethane | µg/L | 0.05 U | 13 | 0.2 |
| 1,1,2,2-Tetrachloroethane | µg/L | 0.019 U | 0.019 U | 0.019 U |
| 1,1,2-Trichloroethane | µg/L | 0.06 U | 0.06 U | 0.06 U |
| 1,1-Dichloroethane | µg/L | 0.06 U | 3.2 | 0.06 U |
| 1,1-Dichloroethene | µg/L | 0.05 U | 0.71 | 0.05 U |
| 1,2,3-Trichlorobenzene | µg/L | 0.07 U | 0.07 U | 0.07 U |
| 1,2,4-Trichlorobenzene | µg/L | 0.06 U | 0.06 U | 0.06 U |
| 1,2-Dibromo-3-chloropropane | µg/L | 0.05 U | 0.05 U | 0.05 U |
| 1,2-Dibromoethane | µg/L | 0.05 U | 0.05 U | 0.05 U |
| 1,2-Dichlorobenzene | µg/L | 0.05 U | 0.05 U | 0.05 U |
| 1,2-Dichloroethane | µg/L | 0.03 U | 0.03 U | 0.03 U |
| 1,2-Dichloropropane | µg/L | 0.05 U | 0.05 U | 0.05 U |
| 1,3-Dichlorobenzene | µg/L | 0.027 U | 0.027 U | 0.027 U |
| 1,4-Dichlorobenzene | µg/L | 0.04 U | 0.04 U | 0.04 U |
| 2-Butanone | µg/L | 0.6 U | 0.6 U | 0.6 U |
| 2-Hexanone | µg/L | 1.6 U | 1.6 U | 1.6 U |
| 4-Methyl-2-pentanone | µg/L | 0.8 U | 0.8 U | 0.8 U |
| Acetone | µg/L | 1.5 U | 2.2 J | 1.5 U |
| Benzene | µg/L | 0.05 U | 0.06 J | 0.05 U |
| Bromochloromethane | µg/L | 0.028 U | 0.028 U | 0.028 U |
| Bromodichloromethane | µg/L | 0.03 U | 0.03 U | 0.03 U |
| Bromoform | µg/L | 0.04 U | 0.04 U | 0.04 U |
| Bromomethane | µg/L | 0.07 U | 0.07 U | 0.07 U |
| Carbon disulfide | µg/L | 0.09 U | 0.09 U | 0.09 U |
| Carbon tetrachloride | µg/L | 0.022 U | 0.022 U | 0.022 U |
| Chlorobenzene | µg/L | 0.04 U | 0.054 J | 0.04 U |
| Chloroethane | µg/L | 0.07 U | 0.14 J | 0.07 U |
| Chloroform | µg/L | 0.022 U | 0.022 U | 0.022 U |
| Chloromethane | µg/L | 0.05 U | 0.05 U | 0.17 U |
| cis-1,2-Dichloroethene | µg/L | 0.05 U | 20 | 0.16 J |
| cis-1,3-Dichloropropene | µg/L | 0.017 U | 0.017 U | 0.017 U |
| Dibromochloromethane | µg/L | 0.026 U | 0.026 U | 0.026 U |
| Dichlorodifluoromethane | µg/L | 0.03 U | 0.03 U | 0.03 U |
| Ethylbenzene | µg/L | 0.024 U | 0.024 U | 0.024 U |
| Isopropylbenzene | µg/L | 0.04 U | 0.04 U | 0.04 U |
| m,p,-Xylene (sum of isomers) | µg/L | 0.08 U | 0.08 U | 0.08 U |
| Methyl tert-butyl ether | µg/L | 0.08 U | 0.08 U | 0.08 U |
| Methylene chloride | µg/L | 0.18 UJ | 0.18 UJ | 0.18 UJ |
| o-Xylene | µg/L | 0.023 U | 0.023 U | 0.023 U |
| Styrene | µg/L | 0.022 U | 0.022 U | 0.022 U |
| Tetrachloroethene | µg/L | 0.05 U | 0.05 U | 0.05 U |
| Toluene | µg/L | 0.06 U | 0.11 J | 0.06 U |
| trans-1,2-Dichloroethene | µg/L | 0.06 U | 0.39 | 0.06 U |
| trans-1,3-Dichloropropene | µg/L | 0.017 U | 0.017 U | 0.017 U |
| Trichloroethene | µg/L | 0.05 U | 55 | 0.6 |
| Vinyl chloride | µg/L | 0.013 U | 1.6 | 0.013 U |

J indicates that the value was between the method detection limit and the limit of quantitation and, therefore, is estimated.

U indicates that the constituent was not detected above the method detection limit.

UJ indicates that the constituent was not detected above the estimated method detection limit.

UB indicates that the constituent is considered to be below the detection limit listed due to blank contamination.

Figures

- NOTES**
1. BASE MAP DEVELOPED FROM INFORMATION PROVIDED BY RMT, INC. ON 10/26/04
 2. BASE MAP DEVELOPED FROM AERIAL PHOTOGRAPHS DATED 3/26/1999 PREPARED BY AEROMETRICS, INC., SHEBOYGAN, WISCONSIN.
 3. VERTICAL DATUM (ELEVATION) IS REFERENCED TO USGS MEAN SEA LEVEL DATUM, 1929 ADJUSTMENT. TOPOGRAPHIC CONTOUR INTERVAL: 2 FEET.
 4. THE HORIZONTAL DATUM IS BASED ON THE WISCONSIN STATE PLANE COORDINATE SYSTEM, NORTH AMERICAN DATUM (NAD) 1927 - WISCONSIN SOUTH.
 5. MONITORING WELL LOCATIONS AND ELEVATIONS ARE BASED ON A SURVEY PERFORMED BY SPATIAL DATA SURVEYS ON DECEMBER 2001, JANUARY 2002, JUNE 2002, AND APRIL 2003.
 6. SITE BENCHMARKS ESTABLISHED BASED ON SURVEY FROM BENCHMARK MONUMENT LOCATED ON THE SOUTHWEST CORNER OF THE INTERSECTION OF MAPLETON ROAD AND MILL ROAD. NE 1/4 OF NE 1/4 OF SECTION 8, TOWNSHIP 8 NORTH, RANGE 17 EAST.
 7. THE PRIVATE OR SUPPLY WELLS SHOWN ON THIS MAP REPRESENT A PORTION OF THE PRIVATE WELLS SERVING THE RESIDENTS OR BUSINESSES IN THE TOWN OF ASHIPPUN, AND REPRESENT A PORTION OF THESE WELLS THAT LIKELY EXIST WITHIN THE CONFINED AREA OF THIS MAP.

LEGEND

SITE INSTRUMENTATION

- BEDROCK MONITORING WELL
- DEEP UNCONSOLIDATED MONITORING WELL
- SHALLOW UNCONSOLIDATED MONITORING WELL
- DRIVE POINT WELL
- EXTRACTION WELL
- SITE BUILDING WELL (DW-01)
- RESIDENTIAL WELL
- DEEP UNCONSOLIDATED SENTINEL WELL
- SHALLOW UNCONSOLIDATED SENTINEL WELL
- STAFF GAUGE
- CURRENT SITE BUILDING
- FORMER OECL SITE BUILDING
- FORMER OECL SITE BOUNDARY
- FENCED AREA
- ELEVATION CONTOUR (FT ABOVE MEAN SEA LEVEL)
CONTOUR INTERVAL = 2 FT

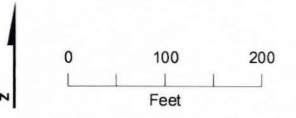
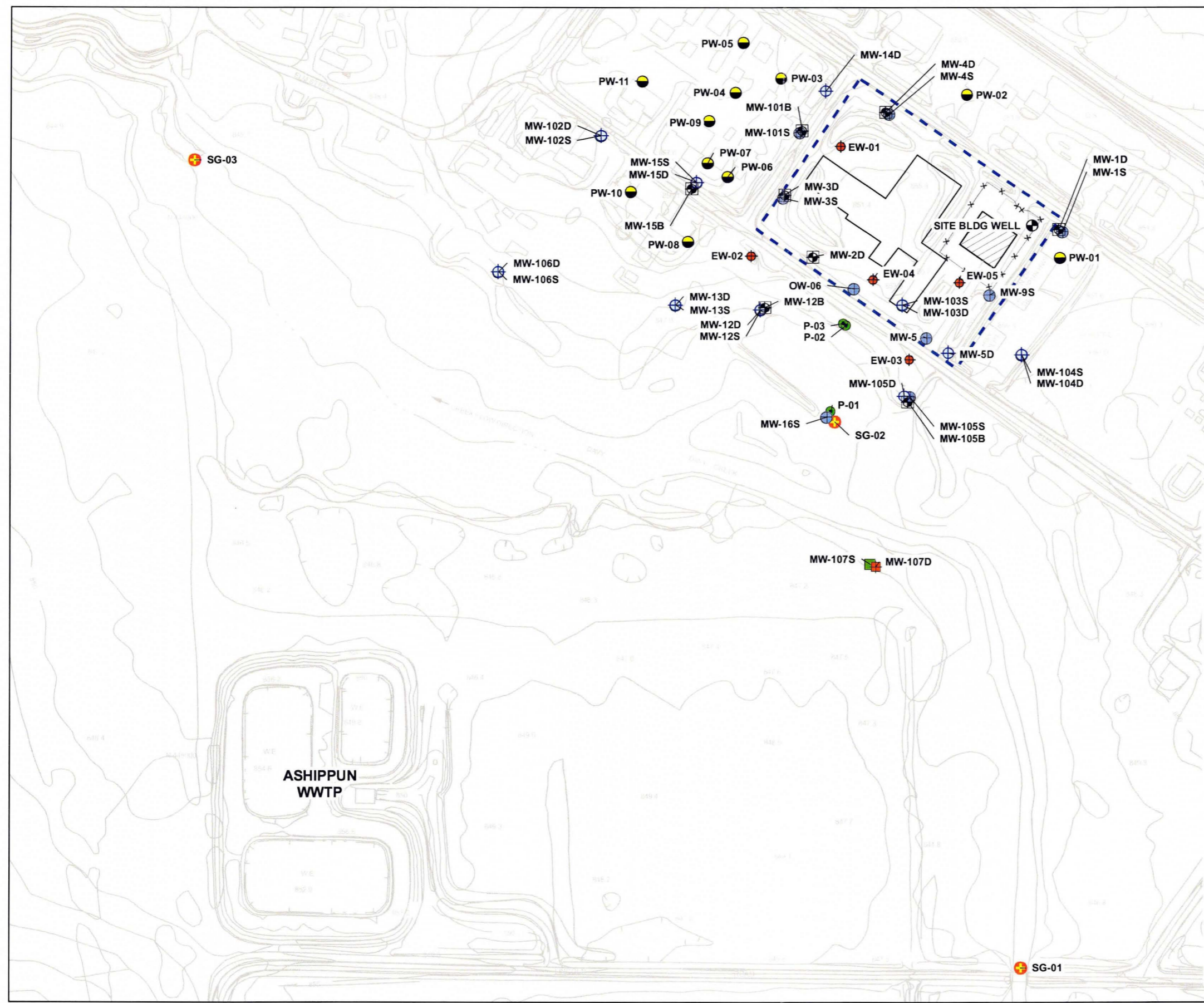


FIGURE 1
Site Monitoring Location- April 2008
2008 2nd Quarter Groundwater Report
OECL Site

NOTES

1. BASE MAP DEVELOPED FROM INFORMATION PROVIDED BY RMT, INC. ON 10/26/04
2. BASE MAP DEVELOPED FROM AERIAL PHOTOGRAPHS DATED 3/26/1999 PREPARED BY AEROMETRICS, INC., SHEBOYGAN, WISCONSIN.
3. VERTICAL DATUM (ELEVATION) IS REFERENCED TO USGS MEAN SEA LEVEL DATUM, 1929 ADJUSTMENT. TOPOGRAPHIC CONTOUR INTERVAL: 2 FEET.
4. THE HORIZONTAL DATUM IS BASED ON THE WISCONSIN STATE PLANE COORDINATE SYSTEM, NORTH AMERICAN DATUM (NAD) 1927 - WISCONSIN SOUTH.
5. MONITORING WELL LOCATIONS AND ELEVATIONS ARE BASED ON A SURVEY PERFORMED BY SPATIAL DATA SURVEYS ON DECEMBER 2001, JANUARY 2002, JUNE 2002, AND APRIL 2003.
6. SITE BENCHMARKS ESTABLISHED BASED ON SURVEY FROM BENCHMARK MONUMENT LOCATED ON THE SOUTHWEST CORNER OF THE INTERSECTION OF MAPLETON ROAD AND MILL ROAD, NE 1/4 OF NE 1/4 OF SECTION 8, TOWNSHIP 8 NORTH, RANGE 17 EAST.
7. THE PRIVATE OR SUPPLY WELLS SHOWN ON THIS MAP REPRESENT A PORTION OF THE PRIVATE WELLS SERVING THE RESIDENTS OR BUSINESSES IN THE TOWN OF ASHIPPIUN, AND REPRESENT A PORTION OF THESE WELLS THAT LIKELY EXIST WITHIN THE CONFINED AREA OF THIS MAP.

LEGEND

SITE INSTRUMENTATION

- BEDROCK MONITORING WELL
- DEEP UNCONSOLIDATED MONITORING WELL
- SHALLOW UNCONSOLIDATED MONITORING WELL
- DRIVE POINT WELL
- EXTRACTION WELL
- SITE BUILDING WELL (DW-01)
- RESIDENTIAL WELL
- DEEP UNCONSOLIDATED SENTINEL WELL
- SHALLOW UNCONSOLIDATED SENTINEL WELL
- STAFF GAUGE
- CURRENT SITE BUILDING
- FORMER OECl SITE BUILDING
- FORMER OECl SITE BOUNDARY
- FENCED AREA
- ELEVATION CONTOUR (FT ABOVE MEAN SEA LEVEL)
CONTOUR INTERVAL = 2 FT

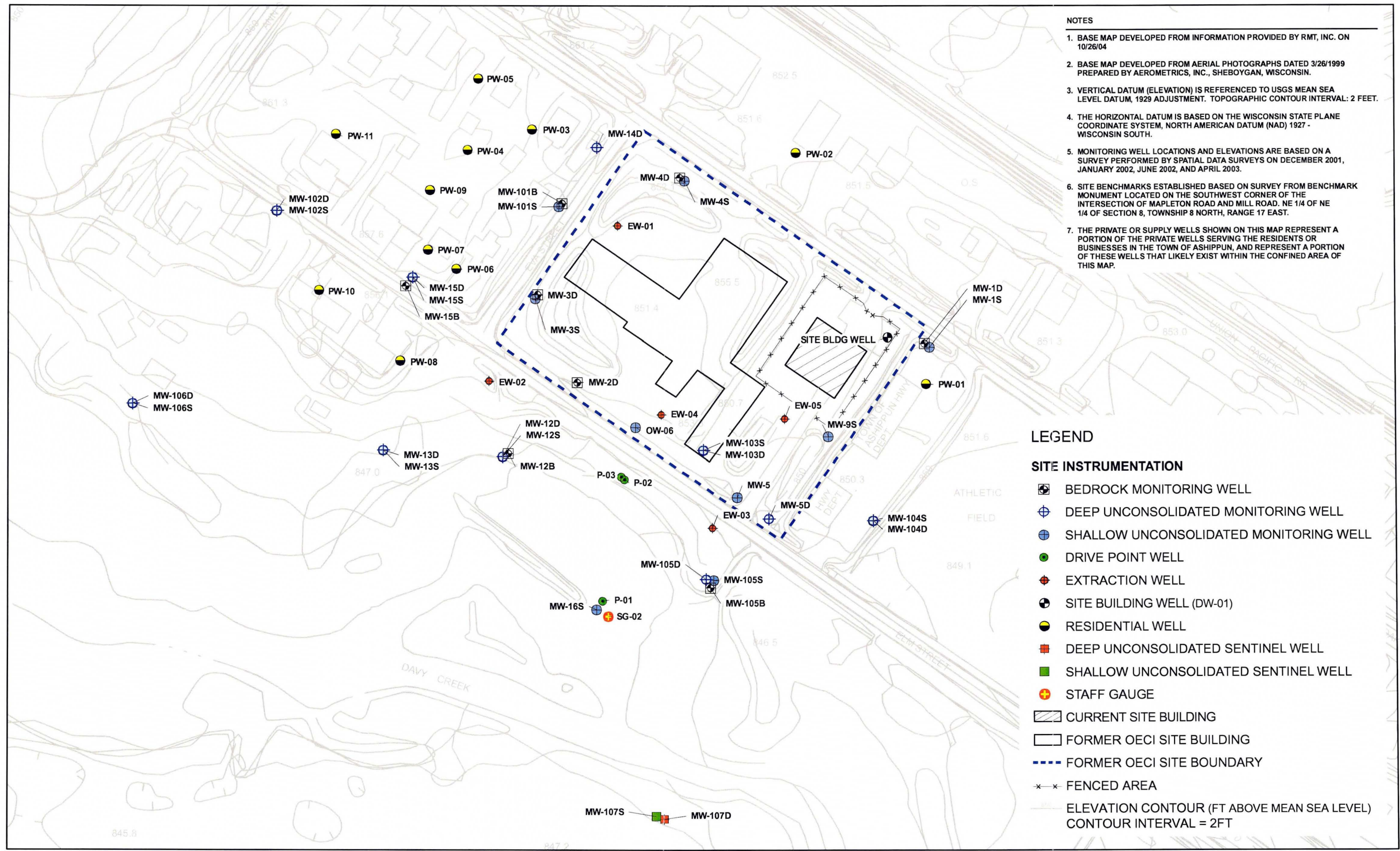
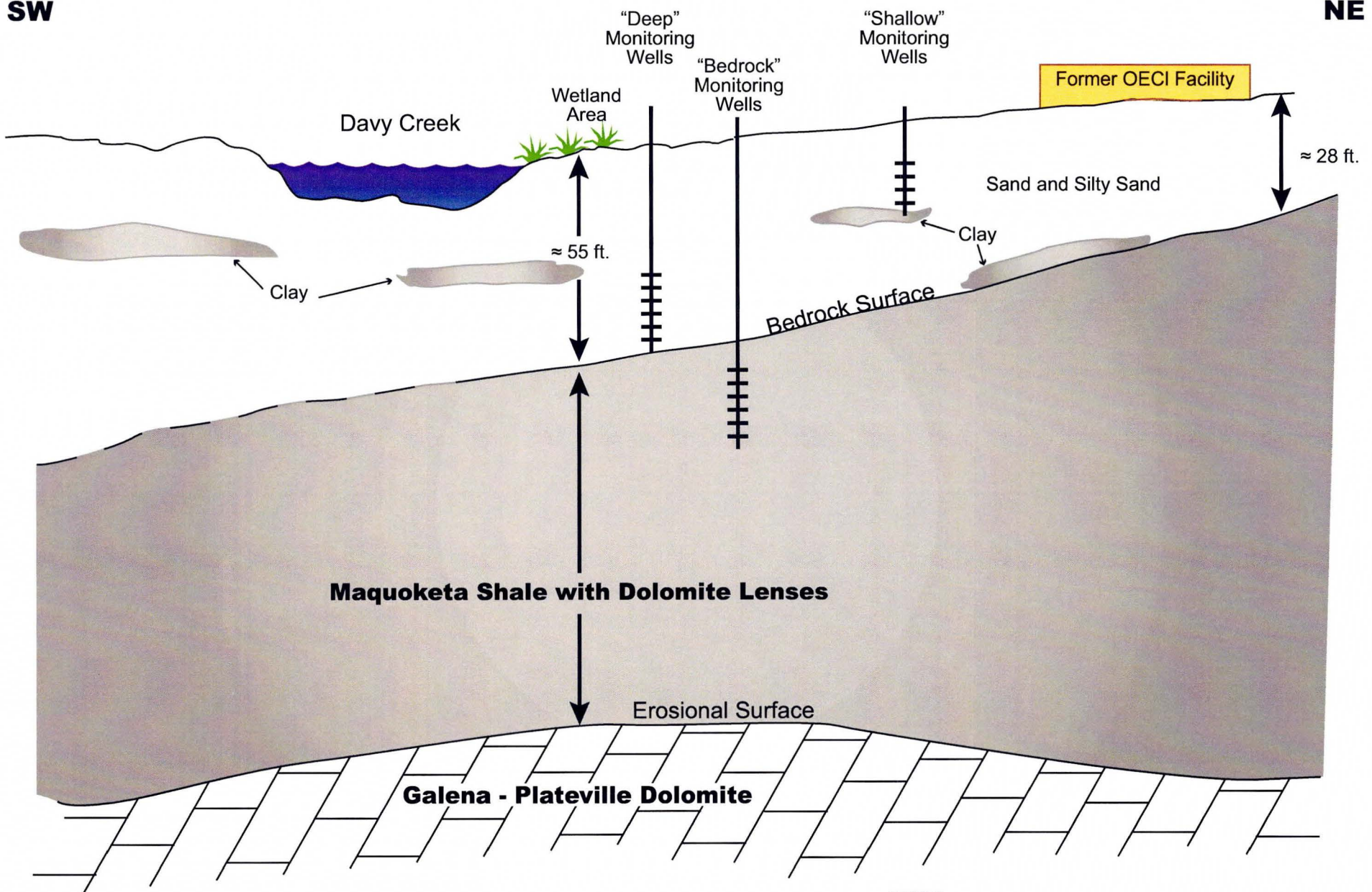


FIGURE 2
 Site Monitoring Well Locations - April 2008
 2008 2nd Quarter Groundwater Report
 OECl Site

SW

NE

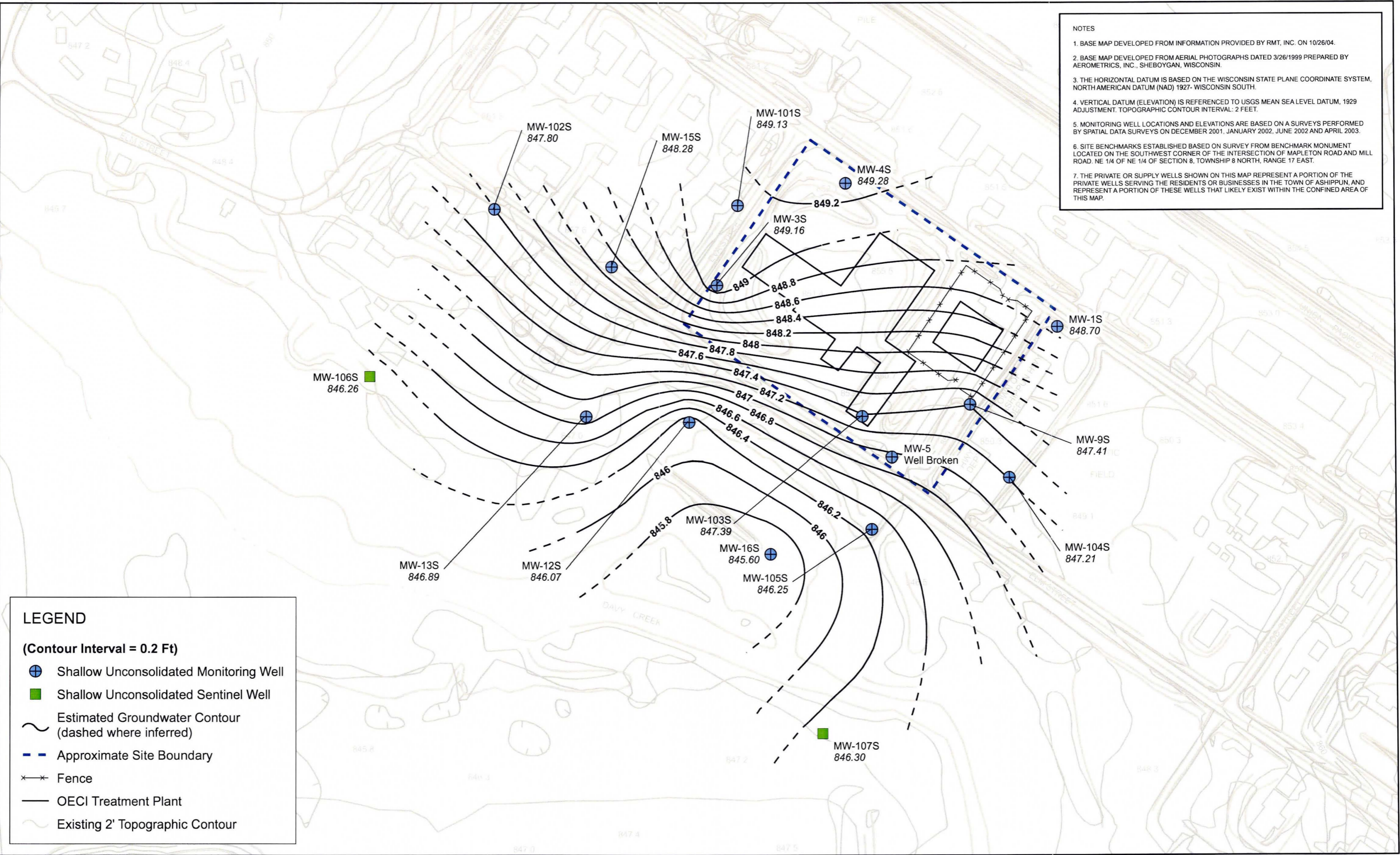


Maquoketa Shale with Dolomite Lenses

Galena - Plateville Dolomite

- NOT TO SCALE -

FIGURE 3
 Conceptual Depiction of Site Aquifer Units and Well Placement – April 2008
 2008 2nd Quarter Groundwater Report
 OECl Site



NOTES

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2. BASE MAP DEVELOPED FROM AERIAL PHOTOGRAPHS DATED 3/26/1999 PREPARED BY AEROMETRICS, INC., SHEBOYGAN, WISCONSIN.
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4. VERTICAL DATUM (ELEVATION) IS REFERENCED TO USGS MEAN SEA LEVEL DATUM, 1929 ADJUSTMENT. TOPOGRAPHIC CONTOUR INTERVAL: 2 FEET.
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7. THE PRIVATE OR SUPPLY WELLS SHOWN ON THIS MAP REPRESENT A PORTION OF THE PRIVATE WELLS SERVING THE RESIDENTS OR BUSINESSES IN THE TOWN OF ASHIPUN, AND REPRESENT A PORTION OF THESE WELLS THAT LIKELY EXIST WITHIN THE CONFINED AREA OF THIS MAP.

LEGEND

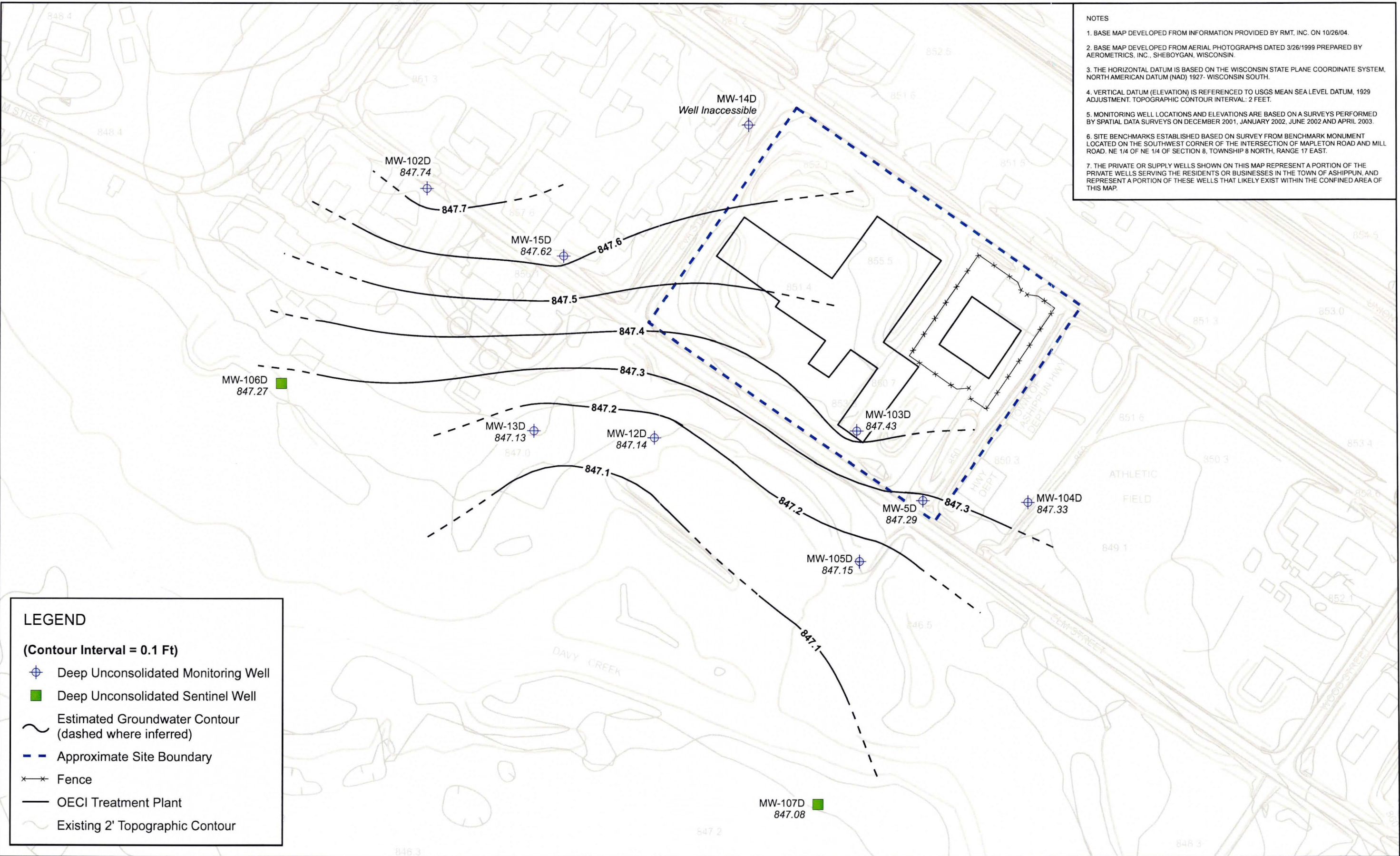
(Contour Interval = 0.2 Ft)

- ⊕ Shallow Unconsolidated Monitoring Well
- Shallow Unconsolidated Sentinel Well
- ~ Estimated Groundwater Contour (dashed where inferred)
- - - Approximate Site Boundary
- ✕✕ Fence
- OECl Treatment Plant
- Existing 2' Topographic Contour

FIGURE 4
 Shallow Unconsolidated Groundwater Elevations - April 2008
 2008 2nd Quarter Groundwater Report
 OECl Site

NOTES

1. BASE MAP DEVELOPED FROM INFORMATION PROVIDED BY RMT, INC. ON 10/26/04.
2. BASE MAP DEVELOPED FROM AERIAL PHOTOGRAPHS DATED 3/26/1999 PREPARED BY AEROMETRICS, INC., SHEBOYGAN, WISCONSIN.
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4. VERTICAL DATUM (ELEVATION) IS REFERENCED TO USGS MEAN SEA LEVEL DATUM, 1929 ADJUSTMENT. TOPOGRAPHIC CONTOUR INTERVAL: 2 FEET.
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7. THE PRIVATE OR SUPPLY WELLS SHOWN ON THIS MAP REPRESENT A PORTION OF THE PRIVATE WELLS SERVING THE RESIDENTS OR BUSINESSES IN THE TOWN OF ASHIPPUN, AND REPRESENT A PORTION OF THESE WELLS THAT LIKELY EXIST WITHIN THE CONFINED AREA OF THIS MAP.

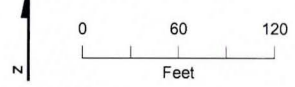


LEGEND

(Contour Interval = 0.1 Ft)

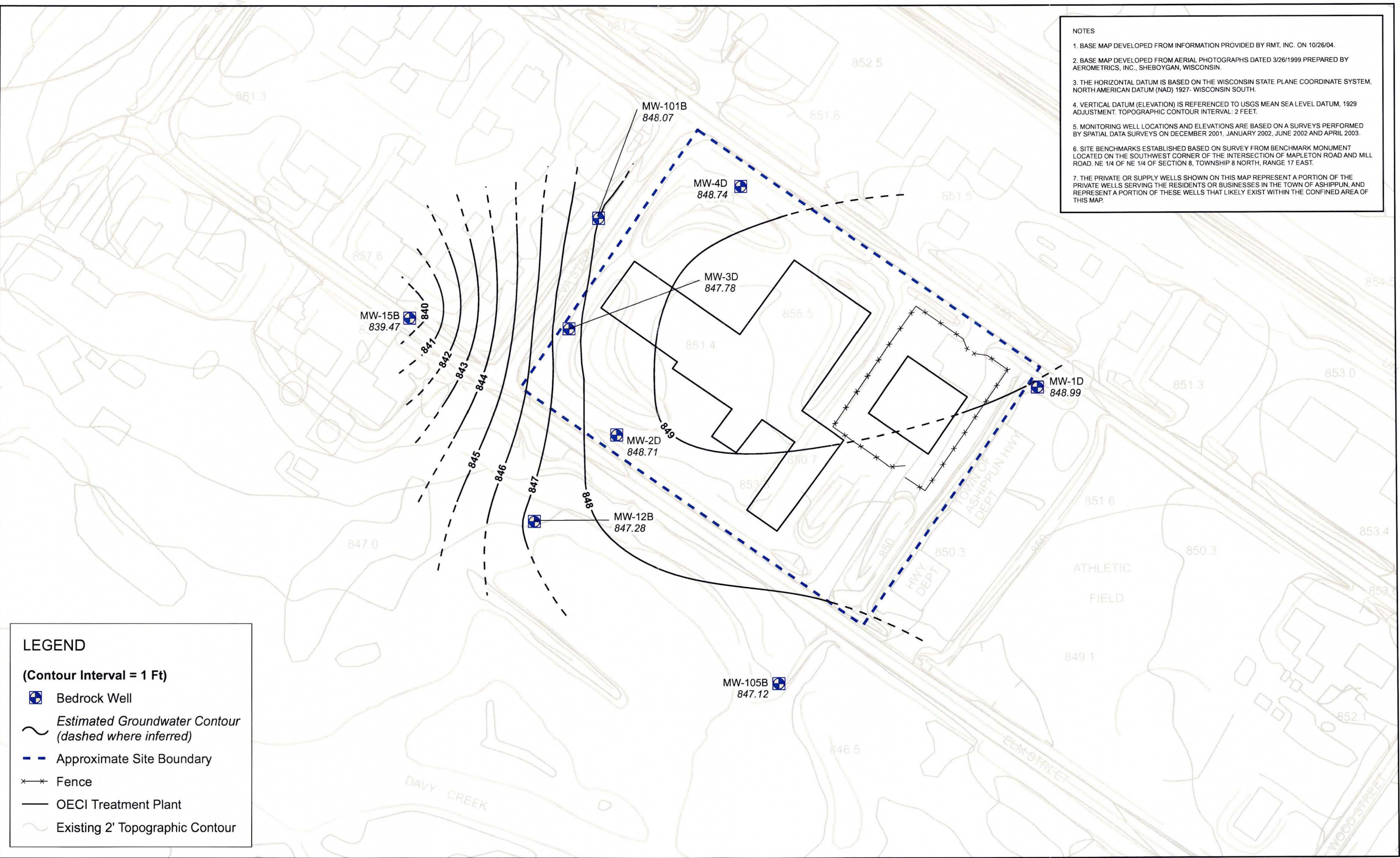
- ⊕ Deep Unconsolidated Monitoring Well
- Deep Unconsolidated Sentinel Well
- ~ Estimated Groundwater Contour (dashed where inferred)
- - - Approximate Site Boundary
- ××× Fence
- OECl Treatment Plant
- Existing 2' Topographic Contour

FIGURE 5
 Deep Unconsolidated Groundwater Elevations - April 2008
 2008 2nd Quarter Groundwater Report
 OECl Site



NOTES

1. BASE MAP DEVELOPED FROM INFORMATION PROVIDED BY RMT, INC. ON 10/26/04.
2. BASE MAP DEVELOPED FROM AERIAL PHOTOGRAPHS DATED 3/26/1999 PREPARED BY AEROMETRICS, INC., SHEBOYGAN, WISCONSIN.
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4. VERTICAL DATUM (ELEVATION) IS REFERENCED TO USGS MEAN SEA LEVEL DATUM, 1929 ADJUSTMENT. TOPOGRAPHIC CONTOUR INTERVAL: 2 FEET.
5. MONITORING WELL LOCATIONS AND ELEVATIONS ARE BASED ON A SURVEYS PERFORMED BY SPATIAL DATA SURVEYS ON DECEMBER 2001, JANUARY 2002, JUNE 2002 AND APRIL 2003.
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LEGEND

(Contour Interval = 1 Ft)

- Bedrock Well
- Estimated Groundwater Contour (dashed where inferred)
- Approximate Site Boundary
- Fence
- OECI Treatment Plant
- Existing 2' Topographic Contour

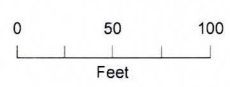


FIGURE 6
 Bedrock Groundwater Elevations - April 2008
 2008 2nd Quarter Groundwater Report
 OECI Site

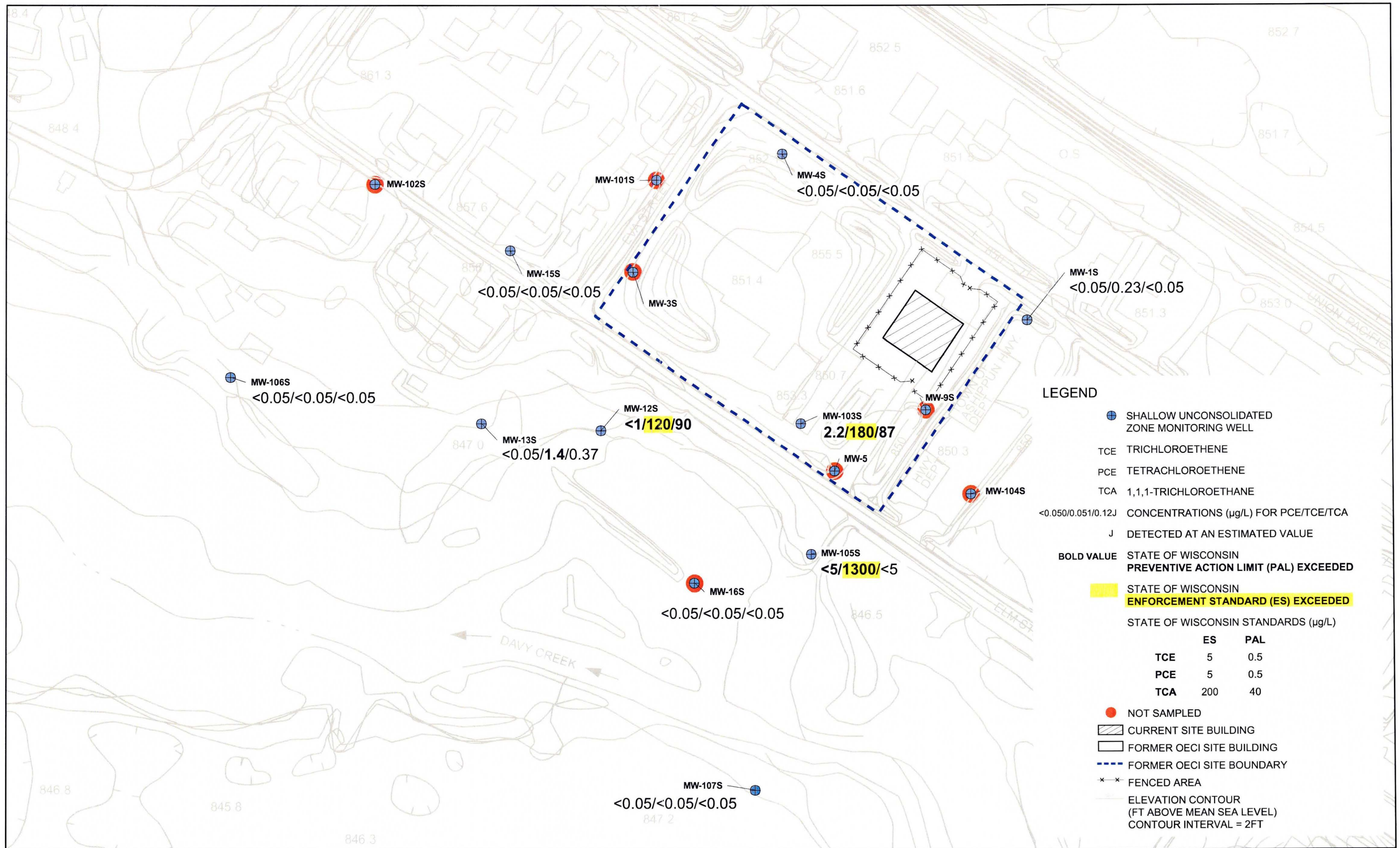
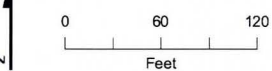


FIGURE 7
 Groundwater PCE, TCE and TCA Concentrations in Shallow Unconsolidated Wells – April 2008
 2008 2nd Quarter Groundwater Report
 OECl Site



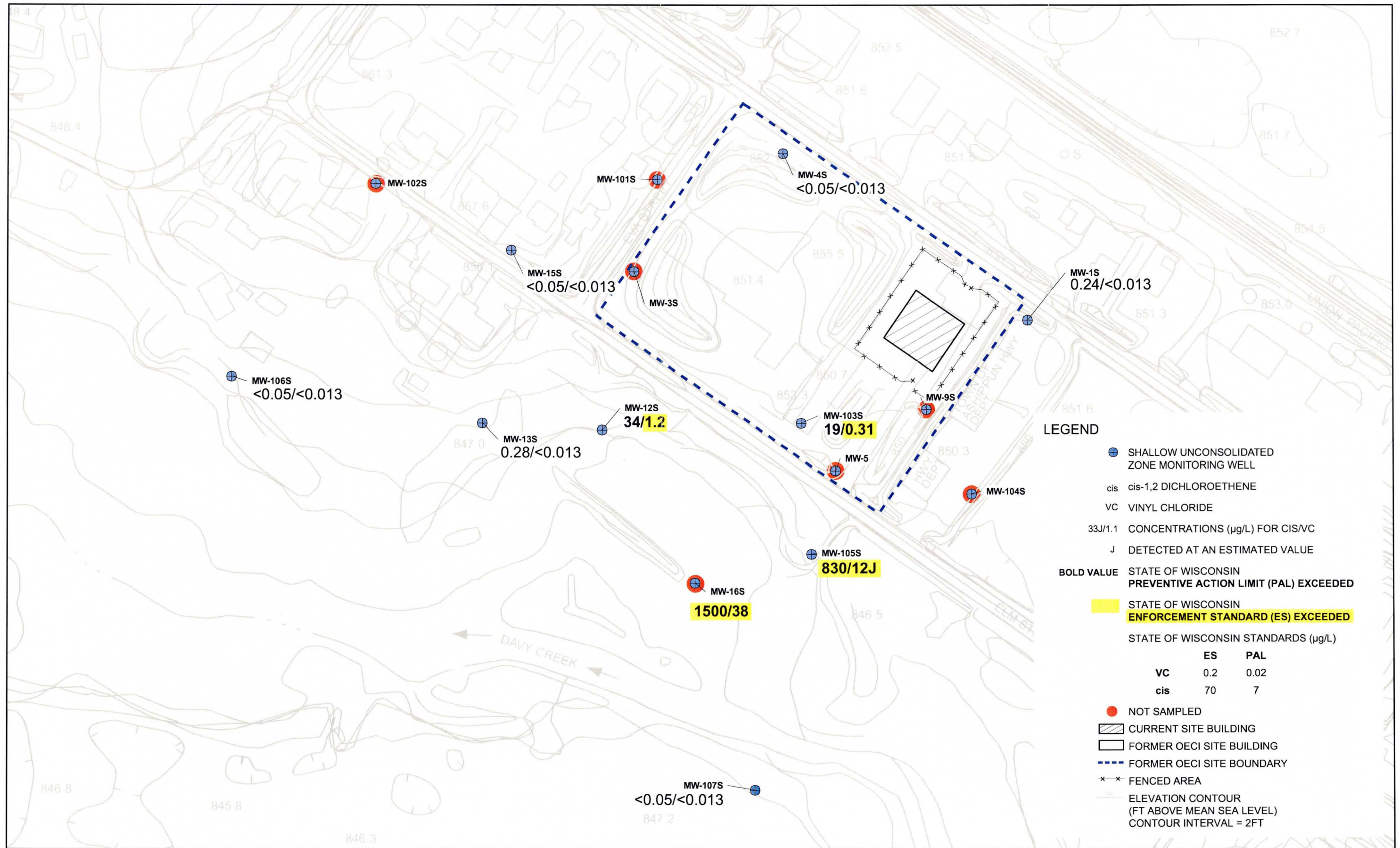


FIGURE 8
 Groundwater CIS and VC Concentrations in Shallow Unconsolidated Wells – April 2008
 2008 2nd Quarter Groundwater Report
 OECS Site

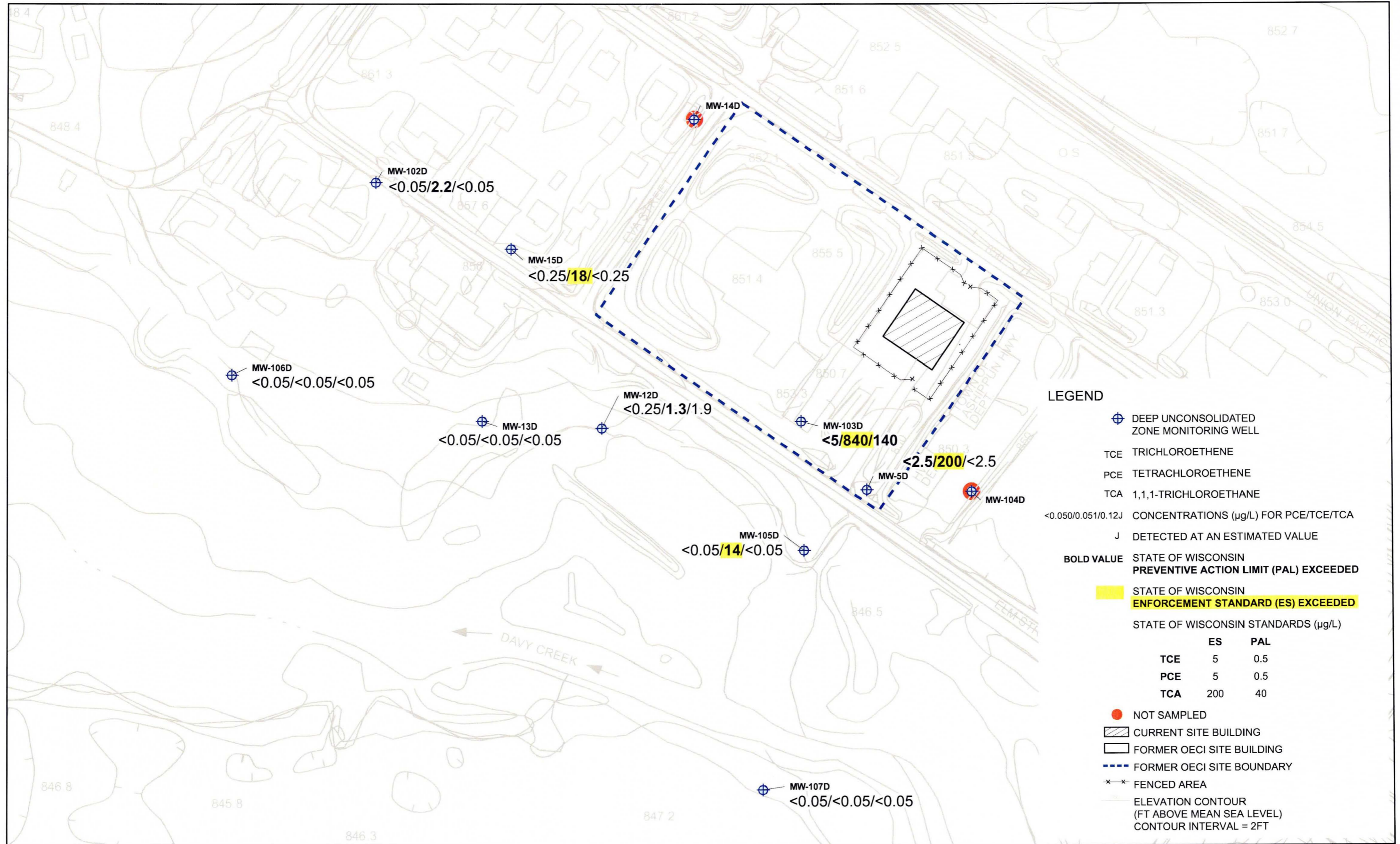
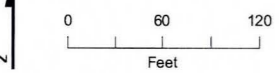
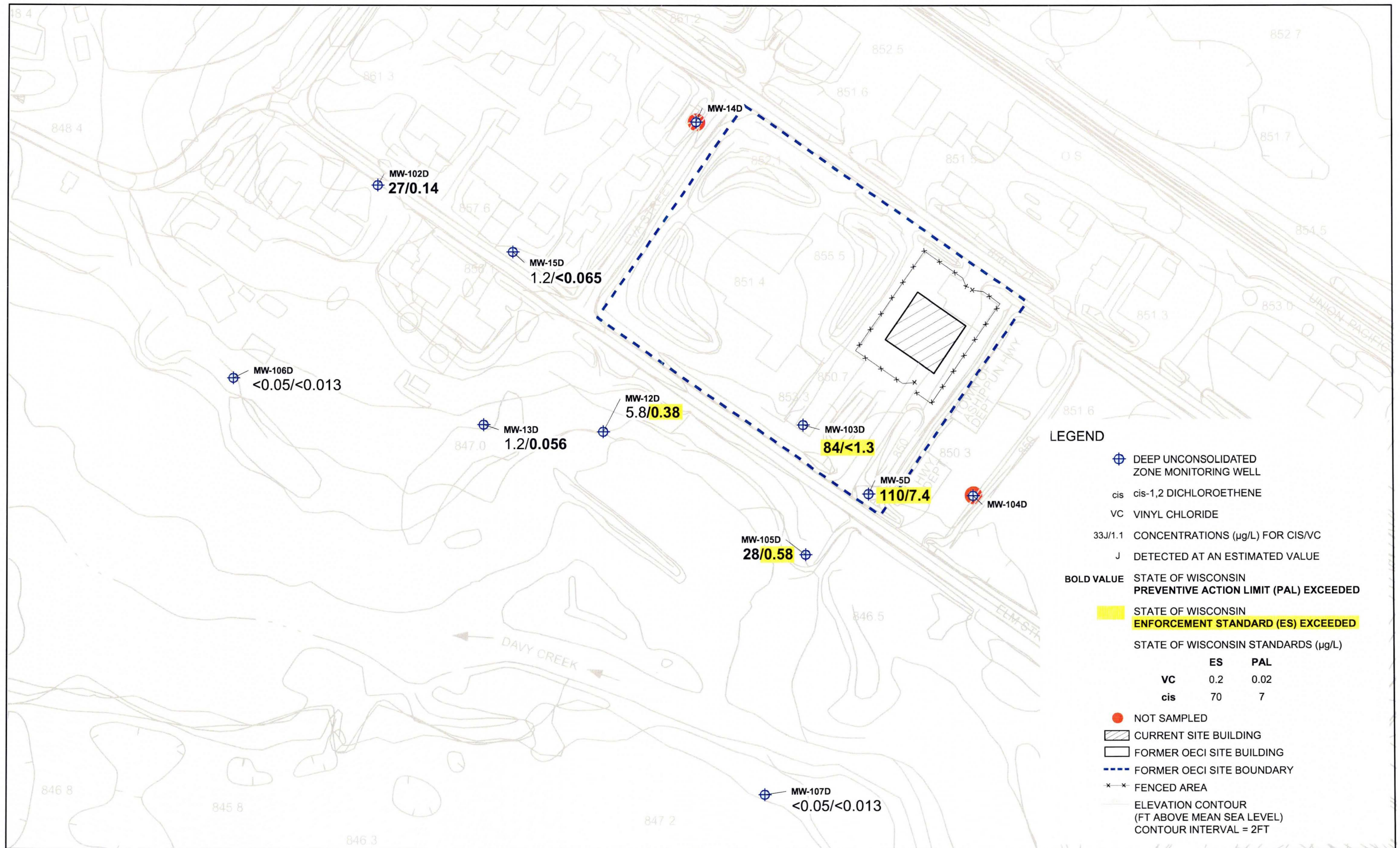


FIGURE 9
 Groundwater PCE, TCE and TCA Concentrations in Deep Unconsolidated Wells – April 2008
 2008 2nd Quarter Groundwater Report
 OECL Site





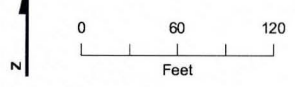
LEGEND

- DEEP UNCONSOLIDATED ZONE MONITORING WELL
- cis cis-1,2 DICHLOROETHENE
- VC VINYL CHLORIDE
- 33J/1.1 CONCENTRATIONS ($\mu\text{g/L}$) FOR CIS/VC
- J DETECTED AT AN ESTIMATED VALUE
- BOLD VALUE** STATE OF WISCONSIN PREVENTIVE ACTION LIMIT (PAL) EXCEEDED
- STATE OF WISCONSIN ENFORCEMENT STANDARD (ES) EXCEEDED

| STATE OF WISCONSIN STANDARDS ($\mu\text{g/L}$) | | |
|--|-----|------|
| | ES | PAL |
| VC | 0.2 | 0.02 |
| cis | 70 | 7 |

- NOT SAMPLED
- CURRENT SITE BUILDING
- FORMER OECl SITE BUILDING
- FORMER OECl SITE BOUNDARY
- FENCED AREA
- ELEVATION CONTOUR (FT ABOVE MEAN SEA LEVEL) CONTOUR INTERVAL = 2FT

FIGURE 10
 Groundwater CIS and VC Concentrations in Deep Unconsolidated Wells – April 2008
 2008 2nd Quarter Groundwater Report
 OECl Site



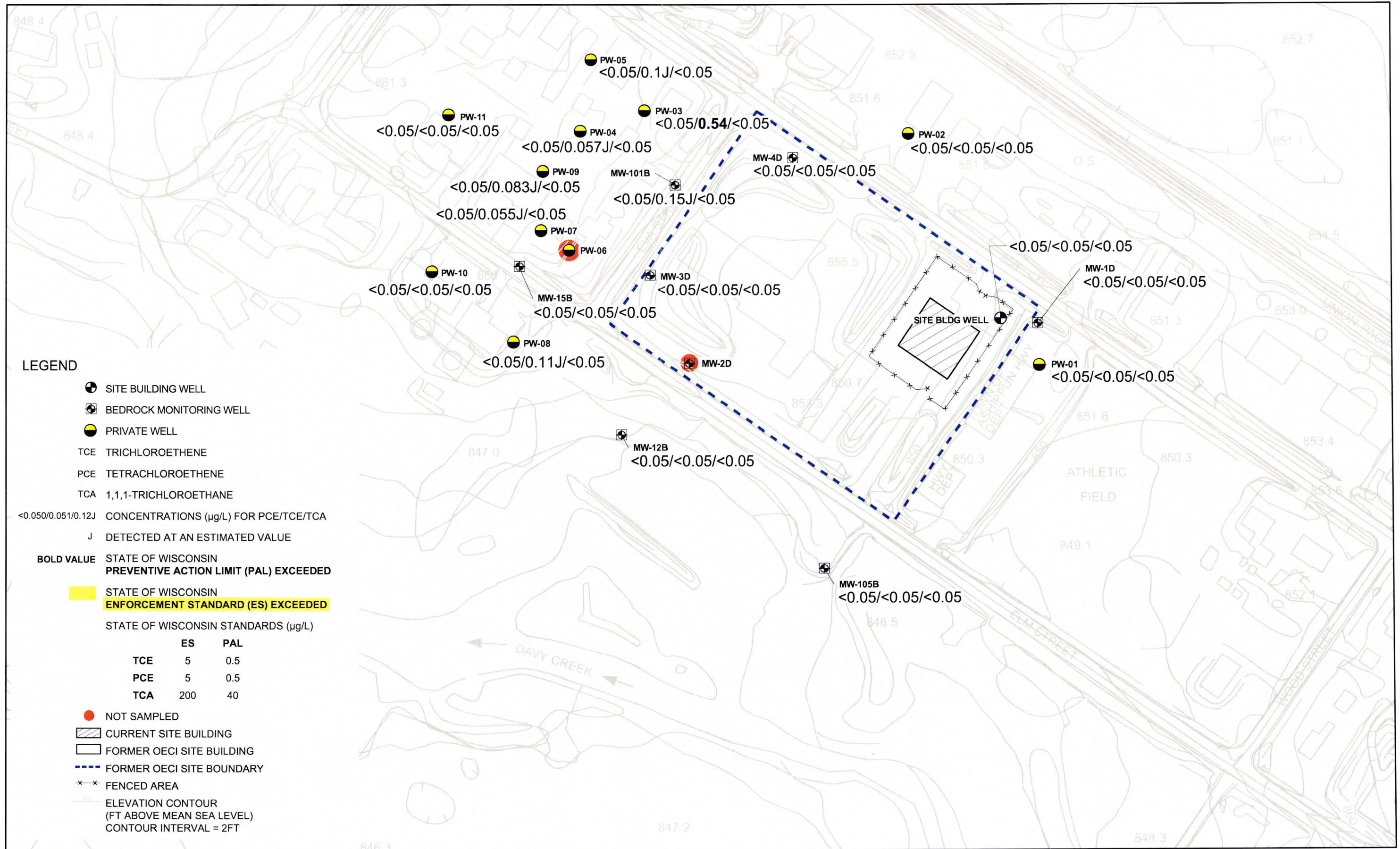


FIGURE 11
 Groundwater PCE, TCE and TCA Concentrations in Bedrock Wells – April 2008
 2008 2nd Quarter Groundwater Report
 OECl Site

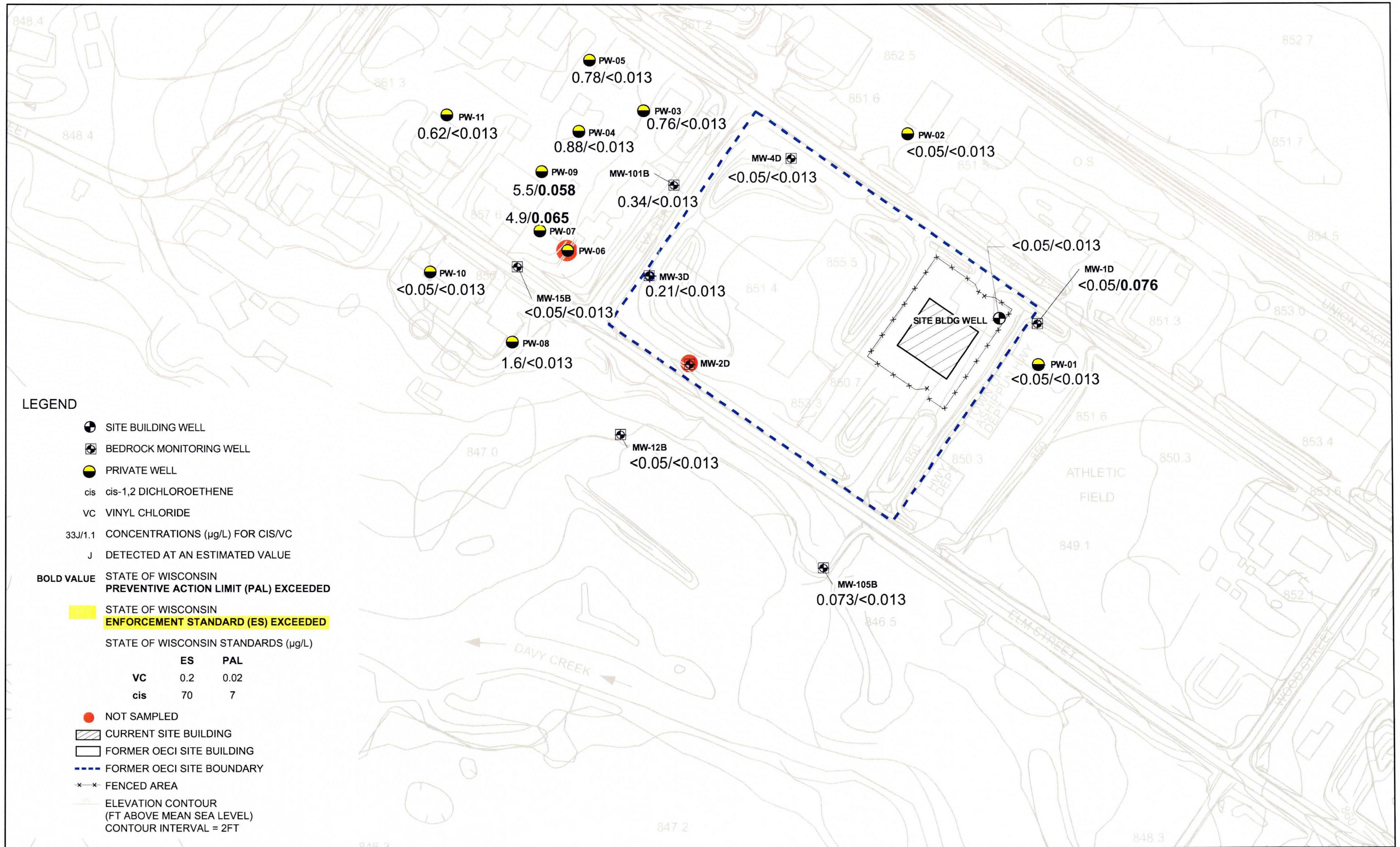


FIGURE 12
Groundwater CIS and VC Concentrations in Bedrock Wells – April 2008
2008 2nd Quarter Groundwater Report
OECl Site

Appendix A
Data Validation Memorandum

Data Usability Evaluation

Oconomowoc Electroplating Company, Inc. Site, Ashippun, Wisconsin

WA No. 003-LRLR-05M8, Contract No. EP-S5-06-01

PREPARED FOR: U.S. Environmental Protection Agency

PREPARED BY: Adrienne Unger/CH2M HILL

DATE: September 11, 2008

This memorandum presents the data usability evaluation of the groundwater samples collected during the field investigation conducted at the Oconomowoc Electroplating Company, Inc. site in Ashippun, Wisconsin, during April 2008. CH2M HILL performed the sampling. CT Laboratories, Inc. of Baraboo, Wisconsin, performed the analyses.

Sixty groundwater and surface water samples were collected, including quality control (QC) samples, and analyzed for one or more of the following U.S. Environmental Protection Agency (USEPA)-approved methods:

- Volatile organic compounds (VOCs) by USEPA SW-846 Method 8260
- Alkalinity by USEPA 310.2
- Ammonia by USEPA 350.1
- Chloride by USEPA SW-846 Method 9056
- Methane, ethane, and ethene by RSK 175
- Nitrate by USEPA SW-846 Method 9056
- Orthophosphate by USEPA SW-846 Method 9056
- Sulfate by USEPA SW-846 Method 9056
- Sulfide by USEPA 376.1
- Total organic carbon by USEPA SW-846 Method 9060
- Total metals by USEPA SW-846 Method 6010B
- Dissolved metals by USEPA SW-846 Method 6010B

As part of the quality assurance (QA) process outlined in the field sampling plan (CH2M HILL 2006), QC samples were collected in the field to complement the assessment of overall data quality and usability. These QC samples collected were field duplicates, aliquots for laboratory matrix spike/matrix spike duplicates (MS/MSDs), a field blank, and an equipment blank. VOC trip blanks also were used as a means of QC; these samples were supplied by the laboratory.

The dataset was reviewed by the USEPA Environmental Service Assistance Team (ESAT) contractor, TechLaw, (Attachment 1) to assess the accuracy and precision of the method and the matrix using criteria established in the National Functional Guidelines (NFG) for data review. Completeness of the dataset was then derived. USEPA validators added data

qualifiers when the QC statistics indicated a possible bias to specific compounds or analytes associated with a particular method and sample batch.

Standard data qualifiers were used as a means of classifying the data as to their conformance to QC requirements. The applied data qualifiers are defined as follows:

- [U] The sample target was analyzed for but not detected above the level of the associated limit of detection or quantitation.
- [J] The associated value is an estimated quantity. This qualifier was appended when the data indicated the presence of a specific target analyte but was below the stated reporting (or quantitation) limit, and/or when QC statistics alluded to an analytical bias.
- [UJ] The component was analyzed for but not detected at a level equal to or greater than the level of detection (LOD) or quantification (often the reporting limit [RL]). This flag was used when QC measurements indicated a possible low bias in the analytical data.
- [R] Rejected. The data were of insufficient quality to be deemed acceptable as reported or otherwise qualified.

Groundwater Samples

CH2M HILL conducted a review of the validation performed by USEPA for the groundwater samples in sample delivery group (SDG) 66005. Table 1 lists the sample identifications (IDs) and Station Locations that were reviewed (100 percent of all samples collected).

TABLE 1
 Sample Summary by Laboratory ID and Station Location
Oconomowoc Electroplating

| Sample ID | Location | Sample ID | Location | Sample ID | Location |
|-----------|------------------|-----------|----------------|-----------|----------------|
| 08CE12-01 | OEP-MW-003D | 08CE12-31 | OEP-JS-003 | 08CE12-62 | OEP-PW-04 |
| 08CE12-02 | OEP-MW-003D(F) | 08CE12-32 | OEP-MW-013D | 08CE12-63 | OEP-JS-007 |
| 08CE12-03 | OEP-JS-001 | 08CE12-33 | OEP-MW-013D(F) | 08CE12-64 | OEP-JS-008 |
| 08CE12-04 | OEP-MW-103S | 08CE12-34 | OEP-JS-004 | 08CE12-65 | OEP-SW-03 |
| 08CE12-05 | OEP-MW-103S(F) | 08CE12-35 | OEP-MW-013S | 08CE12-66 | OEP-SW-03(F) |
| 08CE12-06 | OEP-MW-103D | 08CE12-36 | OEP-MW-013S(F) | 08CE12-67 | OEP-PW-07 |
| 08CE12-07 | OEP-MW-103D(F) | 08CE12-37 | OEP-MW-012D | 08CE12-68 | OEP-JS-009 |
| 08CE12-08 | OEP-MW-103DFR | 08CE12-38 | OEP-MW-012D(F) | 08CE12-69 | OEP-MW-015B |
| 08CE12-09 | OEP-MW-103DFR(F) | 08CE12-39 | OEP-MW-012S | 08CE12-70 | OEP-MW-015B(F) |
| 08CE12-10 | OEP-PW-01 | 08CE12-40 | OEP-MW-012S(F) | 08CE12-71 | OEP-MW-106D |
| 08CE12-11 | OEP-PW-01FR | 08CE12-41 | OEP-JS-005 | 08CE12-72 | OEP-MW-106S |
| 08CE12-12 | OEP-MW-015D | 08CE12-42 | OEP-MW-012B | 08CE12-73 | OEP-PW-02 |

TABLE 1
 Sample Summary by Laboratory ID and Station Location
Oconomowoc Electroplating

| Sample ID | Location | Sample ID | Location | Sample ID | Location |
|-----------|------------------|-----------|----------------|-----------|------------------|
| 08CE12-13 | OEP-MW-015D(F) | 08CE12-43 | OEP-MW-012B(F) | 08CE12-74 | OEP-MW-101B |
| 08CE12-14 | OEP-MW-015S | 08CE12-44 | OEP-DW-01 | 08CE12-75 | OEP-MW-101B(F) |
| 08CE12-15 | OEP-MW-015S(F) | 08CE12-45 | OEP-PW-11 | 08CE12-76 | OEP-MW-005D |
| 08CE12-16 | OEP-JS-002 | 08CE12-46 | OEP-PW-05 | 08CE12-77 | OEP-MW-005D(F) |
| 08CE12-17 | OEP-SW-01 | 08CE12-47 | OEP-JS-006 | 08CE12-78 | OEP-JS-010 |
| 08CE12-18 | OEP-SW-01(F) | 08CE12-48 | OEP-MW-001D | 08CE12-79 | OEP-MW-102D |
| 08CE12-19 | OEP-SW-01FR | 08CE12-49 | OEP-MW-001D(F) | 08CE12-80 | OEP-MW-102D(F) |
| 08CE12-20 | OEP-SW-01FR(F) | 08CE12-50 | OEP-MW-001S | 08CE12-81 | OEP-MW-101BFR |
| 08CE12-21 | OEP-MW-105B | 08CE12-51 | OEP-MW-001S(F) | 08CE12-82 | OEP-MW-101BFR(F) |
| 08CE12-22 | OEP-MW-105B(F) | 08CE12-52 | OEP-FB-001 | 08CE12-83 | OEP-JS-011 |
| 08CE12-23 | OEP-MW-105S | 08CE12-54 | OEP-EB-001 | 08CE12-84 | OEP-MW-107D |
| 08CE12-24 | OEP-MW-105S(F) | 08CE12-55 | OEP-EB-001(F) | 08CE12-85 | OEP-MW-107S |
| 08CE12-25 | OEP-MW-105D | 08CE12-56 | OEP-MW-004D | 08CE12-86 | OEP-MW-107SFR |
| 08CE12-26 | OEP-MW-105D(F) | 08CE12-57 | OEP-MW-004D(F) | 08CE12-87 | OEP-MW-016S |
| 08CE12-27 | OEP-MW-105DFR | 08CE12-58 | OEP-MW-004S | 08CE12-88 | OEP-MW-016S(F) |
| 08CE12-28 | OEP-MW-105DFR(F) | 08CE12-59 | OEP-MW-004S(F) | 08CE12-89 | OEP-SW-02 |
| 08CE12-29 | OEP-PW-08 | 08CE12-60 | OEP-PW-03 | 08CE12-90 | OEP-SW-02(F) |
| 08CE12-30 | OEP-PW-10 | 08CE12-61 | OEP-PW-09 | 08CE12-91 | OEP-JS-014 |

The USEPA validation case narratives and worksheets indicate which of these sample results were biased due to applicable QC statistics or other NFG requirements. The qualifications are described in Attachment 1. One result was rejected.

- The MS/MSD recovery for styrene was below 20 percent for sample 08CE12-61. The sample result was qualified as unusable "R".

The dataset completeness is 99.9 percent usable and may be used in the project decision-making process with qualification. In addition, approximately 10 percent of the data underwent a comparative review to evaluate the accuracy between the database and the USEPA validation reports. No discrepancies were noted.

Conclusions

The USEPA validation reports were verified to comply with the applicable NFG for data review. This verification confirmed that the validation performed by USEPA was complete for the entire dataset analyzed by CT Laboratories. Qualified data, if not rejected, are

considered usable for the project decision-making process. The project data quality objectives (DQOs) established a completeness goal for the project at 90 percent. The percent completeness for these groundwater data is 99.9 percent (0.1 percent of the data were rejected) and met the established DQOs set forth in the quality assurance project plan (CH2M HILL 2004).

Data summary tables of the results have been provided as a table in the *2008 Second Quarter Groundwater Report – OECI Site*. An electronic file of these data also will be submitted as part of this deliverable.

Reference Cited

CH2M HILL. 2004. *Quality Assurance Project Plan, Oconomowoc Electroplating, Oconomowoc, Wisconsin*. WA No. 236-RALR-05M8 Contract No. 68-W6-0025. October.

CH2M HILL. 2006. *Field Sampling Plan, Oconomowoc Electroplating, Oconomowoc, Wisconsin*. WA No. 003-LRLR-05MS Contract No. EP-SS-06-01. October.

Attachment 1
Validation Narratives

Regional Transmittal Form

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 5/5/08

SUBJECT: Review of Data
Received for review on 1/31/08

FROM: Stephen L. Ostrodka, Chief (SRT-4J)
Superfund Field Services Section

TO: Data User: CH2M Hill

We have reviewed the data for the following case:

SITE NAME: Oconomowoc Electroplating (WI)

CASE NUMBER: 08CE08 SDG NUMBER: 64519-MET

Number and Type of Samples: 57 waters (29 total/28 dissolved)

Sample Numbers: 08CE08-01 thru -07, -10 thru -22, -28 thru -31, -39 thru -40, -44 thru -51,
-53 thru -56, -58 thru -65, -74 thru -76

Laboratory: CT Laboratories Hrs. for Review: _____

Following are our findings:

CC: Howard Pham
Region 5 TOPO
Mail Code: SRT-4J

Narrative

The laboratory's portion of this case contains 57 water samples (28 dissolved, 29 total, see attached table) which were collected between January 7 and 11, 2008 and received at the laboratory between January 8 and 12, 2008. They were analyzed for iron and manganese. Total and dissolved samples collected January, 2008 were assigned the same EPA sample IDs by the field personnel. See the attached table for specific identifiers. All sample results are reported to the MDL. The samples were analyzed using SW846 6010B (ICP-AES) analysis procedures.

Evidential Audit: All provided ICP reporting forms are CLP-like documents. All documents provided are copies. No location is noted for the originals. No DC-1 or DC-2 forms, or sample tags were provided. Samples identified as "mdl chk" and "mrl" were present in some of the analytical runs. No CLP forms were provided for them.

The analytical run logs contained more than one calibration per form. Additionally, some of the "runs" reported on separate forms were actually different sections of the same analytical run. Multiple copies of the runs were present in the raw data; much time was required to interpret the data. None of the raw data contained all samples and QC actually analyzed in the run. Of the four actual runs from which data were reported only the first (calibrated on 1-11) contained the raw data for both "mdl chk" and "mrl" samples. The second run (calibrated on 1-16) contained the "mdl chk" sample. Neither the 1-17 nor 1-18 (start date) runs contained raw data for those samples. No times are included on the Analysis Run Logs for the calibration.

No analytical date was provided on the MDL summary form or the linearity form. MDL and linearity values recorded on the forms provided were used for evaluation of the data. The values provided for MDLs on the calibration blanks forms (87 for Fe, 3.1 for Mn) were different from the Level of Detection (LOD) listed on the Form 1s (39 total Fe, 10 dissolved Fe, 0.5 total Mn, 0.4 dissolved Mn). Dissolved LOD/RL values are used for evaluation of the blank data. No values or units were filled in for the method blanks for the dissolved analyses.

The Duplicate Forms included (pages 1215-1219 in the case) are for the LCS/LCSD. No sample description is provided on the Form. Duplicate forms are also included for the MS/MSD. The laboratory performed post digestion spikes on serial dilution failures and reported results unqualified. This does not make the data reportable. Samples affected by failed serial dilutions are qualified due to possible matrix interferences.

No times are included on the Analysis Run Logs for the calibration. Four run logs were included with the case; each represents part of the same analytical run.

Analytical QC samples are reported up to three times for the same sample due to the way the laboratory uses its lab sample ID's.

Serial dilution form for 08CE08-05 dissolved not provided (results acceptable). Mn for 08CE05-44

(total) not listed on form, the result failed.

ICP-AES: Section 8(d) of the SAS requires that the RL must be shown to have been met before any samples are analyzed; since the "CRDL" sample was not analyzed at the SAS required RL (the sample contains 300 ug/L Fe and 10 ug/L Mn; the SAS requires 30 ug/L Fe and 6 ug/L Mn), this requirement was not met. All Fe results less than 300 ug/L and Mn results less than 10 ug/L are estimated "J" for detects and "UJ" for non-detects due to the failure of the laboratory to meet the SAS required reporting limit. Method blank form 3 for dissolved samples (lab ID 536252 & 537529) not completed.

For Fe, the SAS required reporting limit for total Fe (30 ug/L) was not met by the laboratory. All non-detect total Fe results (08CE08-03, -06, -20 and -22) are estimated "UJ." Additionally, all Fe results (total and dissolved) greater than the MDL but less than 300 ug/L are estimated for the laboratory failing to meeting the SAS requirement of showing they were able to meet the SAS required reporting limit (see above). Total Fe results for 08CE08-01, -04, -05, -07, -12, -16, -18, -28, -53, -55, -58, -64, -75 and dissolved Fe results for 08CE08-05, -17, -19, -21, -29, -63, -65, -74, -76 are estimated "J" due to the laboratory not demonstrating that they could meet the SAS required reporting limit.

MS/MSD for 08CE08-44 (lab ID 535405/6 is invalid; sample is greater than 4X spike added.

ICSA values cannot be translated to raw data because no lab identifiers are used on the reporting forms and reported values do not agree with order from raw data. Actual values appear to be within acceptance criteria; no results are qualified for this.

For Fe, Fe was detected in one of the ICB's. The result for total sample 08CE08-06 is estimated "J+" due to possible contamination. Also, the results for dissolved samples 08CE08-05, -17, -19, -21, -29 are estimated "J+" due to possible contamination.

For Fe (total) and Mn (total) serial dilution failed. All results are estimated due to possible interferences.

Other comments: Total samples 08CE08-03/-04, -16/-18, -58/-60 and dissolved samples -03/-04, -17/-19, -59/-61 were identified as field duplicates. Duplicates were evaluated according to the same criteria as laboratory duplicates. All showed good correlation.

Samples 08CE08-20 and -21 were identified as equipment blanks. Sample 08CE08-22 was identified as a field blank. No contamination was found in any of the equipment or field blanks.

| <u>Lab ID</u> | <u>Sample ID</u> | <u>Lab ID</u> | <u>Sample ID</u> | <u>Sample Point</u> | <u>Sample Date</u> | <u>Sample Time</u> |
|---------------|------------------|---------------|------------------|---------------------|--------------------|--------------------|
| | (Total) | | (Dissolved) | | | |
| 534660 | 08CE08-01 | 534661 | 08CE08-01 | OEP-MW-004D | 1/7/2008 | 12:20 |
| 534662 | 08CE08-02 | 534663 | 08CE08-02 | OEP-MW-004S | 1/7/2008 | 11:33 |
| 534664 | 08CE08-03 | 534665 | 08CE08-03 | OEP-MW-103D | 1/7/2008 | 15:45 |
| 534666 | 08CE08-04 | 534667 | 08CE08-04 | OEP-MW-103DFR | 1/7/2008 | 15:45 |
| 534646 | 08CE08-05 | 534654 | 08CE08-05 | OEP-MW-103S | 1/7/2008 | 15:15 |
| 534655 | 08CE08-06 | 534656 | 08CE08-06 | OEP-MW-015D | 1/7/2008 | 16:55 |
| 534657 | 08CE08-07 | 534658 | 08CE08-07 | OEP-MW-015S | 1/7/2008 | 16:35 |
| 534920 | 08CE08-10 | 534921 | 08CE08-11 | OEP-MW-001D | 1/8/2008 | 10:35 |
| 534922 | 08CE08-12 | 534923 | 08CE08-13 | OEP-MW-001S | 1/8/2008 | 10:15 |
| 534929 | 08CE08-14 | 534930 | 08CE08-15 | OEP-MW-003D | 1/8/2008 | 10:20 |
| 534924 | 08CE08-16 | 534925 | 08CE08-17 | OEP-SW-01 | 1/8/2008 | 11:05 |
| 534926 | 08CE08-18 | 534927 | 08CE08-19 | OEP-SW-01FR | 1/8/2008 | 11:05 |
| 534931 | 08CE08-20 | 534932 | 08CE08-21 | OEP-EB-001 | 1/8/2008 | 12:10 |
| 534933 | 08CE08-22 | | | OEP-FB-001 | 1/8/2008 | 12:20 |
| 535224 | 08CE08-28 | 535225 | 08CE08-29 | OEP-MW-101B | 1/9/2008 | 11:10 |
| 535230 | 08CE08-30 | 535231 | 08CE08-31 | OEP-MW-015B | 1/9/2008 | 9:50 |
| 535233 | 08CE08-39 | 535234 | 08CE08-40 | OEP-MW-102D | 1/9/2008 | 12:25 |
| 535189 | 08CE08-44 | 535194 | 08CE08-45 | OEP-MW-105D | 1/9/2008 | 15:20 |
| 535199 | 08CE08-46 | 535200 | 08CE08-47 | OEP-MW-105S | 1/9/2008 | 15:15 |
| 535205 | 08CE08-48 | 535206 | 08CE08-49 | OEP-MW-105B | 1/9/2008 | 16:10 |
| 535207 | 08CE08-50 | 535208 | 08CE08-51 | OEP-MW-005D | 1/9/2008 | 16:25 |
| 535496 | 08CE08-53 | 535497 | 08CE08-54 | OEP-MW-013D | 1/10/2008 | 10:00 |
| 535498 | 08CE08-55 | 535499 | 08CE08-56 | OEP-MW-013S | 1/10/2008 | 10:20 |
| 535504 | 08CE08-58 | 535505 | 08CE08-59 | OEP-MW-012D | 1/10/2008 | 11:50 |
| 535506 | 08CE08-60 | 535507 | 08CE08-61 | OEP-MW-012DFR | 1/10/2008 | 11:50 |
| 535508 | 08CE08-62 | 535509 | 08CE08-63 | OEP-MW-012S | 1/10/2008 | 12:00 |
| 535501 | 08CE08-64 | 535502 | 08CE08-65 | OEP-MW-012B | 1/10/2008 | 12:35 |
| 535604 | 08CE08-73 | 535605 | 08CE08-74 | OEP-SW-02 | 1/11/2008 | 9:40 |
| 535606 | 08CE08-75 | 535607 | 08CE08-76 | OEP-SW-03 | 1/11/2008 | 10:00 |
| | | | | | | |

ILM05.4 Data Qualifier Sheet

| <u>Qualifiers</u> | <u>Data Qualifier Definitions</u> |
|-------------------|---|
| U | The analyte was analyzed for, but was not detected above the reported sample quantitation limit. |
| J | The result is an estimated quantity. The associated numerical value is the approximate concentration of the analyte in the sample. |
| J+ | The result is an estimated quantity, but the result may be biased high. |
| J- | The result is an estimated quantity, but the result may be biased low. |
| R | The data are unusable. The sample results are rejected due to serious deficiencies in meeting Quality Control (QC) criteria. The analyte may or may not be present in the sample. |
| UJ | The analyte was analyzed for, but not detected. The reported quantitation limit is approximate and may be inaccurate or imprecise. |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
SUPERFUND DIVISION

DATE:

SUBJECT: Review of Data
Received for Review on: May 23, 2008

FROM: Stephen L. Ostrodka, Chief (SRT-4J)
Superfund Field Services Section

TO: Data User: Ch2m Hill

We have reviewed the data for the following case:

SITE Name: Oconomowoc Electroplating Company (WI)

SAS Project: 08CE12

SDG Number: 66005-VOC

Number and Type of Samples: 60 Waters (60 VOCs/ 31 MEE)

Sample Numbers: 08CE12; -01, -03, -04, -06, -08, -10 thru -12, -14, -16, -17, -19, -21, -23, -25, -27, -29 thru -32, -34, -35, -37, -39, -41, -42, -44 thru -48, -50, -52, -54, -56, -58, -60 thru -65, -67 thru -69, -71 thru -74, -76, -78, -79, -81, -83 thru -87, -89, -91

Laboratory: CT Laboratories

Hrs for Review:

Following are our findings:

CC: Howard Pham
Region 5 TPO
Mail Code: SRT-4J

Below is a summary of the out-of-control audits and the possible effects on the data for this case:

Sixty (60) preserved water samples listed in the following table were collected April 14 - 18, 2008. CT Laboratories of Baraboo, Wisconsin received the samples April 15 - 19, 2008. All samples were received intact and properly cooled. Sixty (60) samples were analyzed April 22 - 27, 2008 by SW-846 Method 8260 for the volatile list of organic analytes identified in the SAS contract for estimated dates of collection January 2007 through March 2011. Thirty-one (31) samples were analyzed April 22 - 25, 2008 by RSK 175 for Methane, Ethane and Ethene as identified in the SAS contract for estimated dates of collection January 2007 through March 2011.

| EPA ID | CTI Lab ID | Sample location | Date sampled | VOC Analyses | MEE Analyses |
|--------------|------------|-----------------|--------------|--------------|--------------|
| 08CE12-01 | 556236 | OEP-MW-003D | 04/14/08 | 04/22/08 | 04/22/08 |
| 08CE12-03 | 556260 | OEP-JS-001 | 04/14/08 | 04/26/08 | |
| 08CE12-04 | 556261 | OEP-MW-103S | 04/14/08 | 04/22/08 | 04/24/08 |
| 08CE12-06 | 556263 | OEP-MW-103D | 04/14/08 | 04/22/08 | 04/24/08 |
| 08CE12-08 | 556265 | OEP-MW-103DFR | 04/14/08 | 04/22/08 | 04/24/08 |
| 08CE12-10 | 556523 | OEP-PW-01 | 04/14/08 | 04/23/08 | |
| 08CE12-11 | 556524 | OEP-PW-01FR | 04/14/08 | 04/23/08 | |
| 08CE12-12 | 556269 | OEP-MW-015D | 04/14/08 | 04/22/08 | 04/24/08 |
| 08CE12-14 | 556271 | OEP-MW-015S | 04/14/08 | 04/23/08 | 04/23/08 |
| 08CE12-16 | 556273 | OEP-JS-002 | 04/14/08 | 04/25/08 | |
| 08CE12-17 | 556274 | OEP-SW-01 | 04/14/08 | 04/23/08 | 04/24/08 |
| 08CE12-19 | 556267 | OEP-SW-01FR | 04/14/08 | 04/22/08 | 04/22/08 |
| 08CE12-21 | 556502 | OEP-MW-105B | 04/15/08 | 04/23/08 | 04/24/08 |
| 08CE12-23 | 556504 | OEP-MW-105S | 04/15/08 | 04/22/08 | 04/24/08 |
| 08CE12-23MS | 558276 | OEP-MW-105S | | 04/22/08 | 04/24/08 |
| 08CE12-23MSD | 558279 | OEP-MW-105S | | 04/22/08 | 04/24/08 |
| 08CE12-25 | 556514 | OEP-MW-105D | 04/15/08 | 04/23/08 | 04/24/08 |
| 08CE12-27 | 556516 | OEP-MW-105DFR | 04/15/08 | 04/22/08 | 04/24/08 |
| 08CE12-29 | 556525 | OEP-PW-08 | 04/15/08 | 04/23/08 | |
| 08CE12-30 | 556526 | OEP-PW-10 | 04/15/08 | 04/23/08 | |
| 08CE12-31 | 556506 | OEP-JS-003 | 04/15/08 | 04/25/08 | |
| 08CE12-32 | 556518 | OEP-MW-013D | 04/15/08 | 04/23/08 | 04/24/08 |
| 08CE12-34 | 556520 | OEP-JS-004 | 04/15/08 | 04/26/08 | |
| 08CE12-35 | 556521 | OEP-MW-013S | 04/15/08 | 04/23/08 | 04/24/08 |
| 08CE12-37 | 556507 | OEP-MW-012D | 04/15/08 | 04/22/08 | 04/24/08 |
| 08CE12-39 | 556509 | OEP-MW-012S | 04/15/08 | 04/22/08 | 04/24/08 |
| 08CE12-41 | 556511 | OEP-JS-005 | 04/15/08 | 04/25/08 | |
| 08CE12-42 | 556512 | OEP-MW-012B | 04/15/08 | 04/23/08 | 04/24/08 |
| 08CE12-44 | 556527 | OEP-DW-01 | 04/15/08 | 04/23/08 | |

| | | | | | |
|--------------|--------|---------------|----------|----------|----------|
| 08CE12-45 | 556528 | OEP-PW-11 | 04/15/08 | 04/23/08 | |
| 08CE12-46 | 556529 | OEP-PW-05 | 04/15/08 | 04/23/08 | |
| 08CE12-47 | 556530 | OEP-JS-006 | 04/15/08 | 04/26/08 | |
| 08CE12-48 | 556809 | OEP-MW-001D | 04/16/08 | 04/24/08 | 04/25/08 |
| 08CE12-50 | 556811 | OEP-MW-001S | 04/16/08 | 04/24/08 | 04/25/08 |
| 08CE12-52 | 556799 | OEP-FB-001 | 04/16/08 | 04/23/08 | 04/24/08 |
| 08CE12-54 | 556800 | OEP-EB-001 | 04/16/08 | 04/24/08 | 04/24/08 |
| 08CE12-56 | 556813 | OEP-MW-004D | 04/16/08 | 04/24/08 | 04/25/08 |
| 08CE12-58 | 556815 | OEP-MW-004S | 04/16/08 | 04/24/08 | 04/25/08 |
| 08CE12-60 | 556793 | OEP-PW-03 | 04/16/08 | 04/23/08 | |
| 08CE12-61 | 556794 | OEP-PW-09 | 04/16/08 | 04/23/08 | |
| 08CE12-61MS | 559352 | OEP-PW-09 | | 04/23/08 | |
| 08CE12-61MSD | 559353 | OEP-PW-09 | | 04/23/08 | |
| 08CE12-62 | 556795 | OEP-PW-04 | 04/16/08 | 04/23/08 | |
| 08CE12-63 | 556817 | OEP-JS-007 | 04/16/08 | 04/26/08 | |
| 08CE12-64 | 556802 | OEP-JS-008 | 04/16/08 | 04/26/08 | |
| 08CE12-65 | 556803 | OEP-SW-03 | 04/16/08 | 04/25/08 | 04/24/08 |
| 08CE12-67 | 556796 | OEP-PW-07 | 04/16/08 | 04/23/08 | |
| 08CE12-68 | 556797 | OEP-JS-009 | 04/16/08 | 04/26/08 | |
| 08CE12-69 | 556805 | OEP-MW-015B | 04/16/08 | 04/24/08 | 04/25/08 |
| 08CE12-71 | 556807 | OEP-MW-106D | 04/16/08 | 04/24/08 | |
| 08CE12-72 | 556808 | OEP-MW-106S | 04/16/08 | 04/24/08 | |
| 08CE12-73 | 556798 | OEP-PW-02 | 04/16/08 | 04/23/08 | |
| 08CE12-74 | 557213 | OEP-MW-101B | 04/17/08 | 04/24/08 | 04/25/08 |
| 08CE12-76 | 557223 | OEP-MW-005D | 04/17/08 | 04/26/08 | 04/25/08 |
| 08CE12-76MS | 560161 | OEP-MW-005D | | 04/26/08 | 04/25/08 |
| 08CE12-76MSD | 560162 | OEP-MW-005D | | 04/26/08 | 04/25/08 |
| 08CE12-78 | 557225 | OEP-JS-010 | 04/17/08 | 04/26/08 | |
| 08CE12-79 | 557215 | OEP-MW-102D | 04/17/08 | 04/27/08 | 04/25/08 |
| 08CE12-81 | 557217 | OEP-MW-101BFR | 04/17/08 | 04/25/08 | 04/25/08 |
| 08CE12-83 | 557219 | OEP-JS-011 | 04/17/08 | 04/26/08 | |
| 08CE12-84 | 557220 | OEP-MW-107D | 04/17/08 | 04/26/08 | |
| 08CE12-85 | 557221 | OEP-MW-107S | 04/17/08 | 04/25/08 | |
| 08CE12-86 | 557222 | OEP-MW-107SFR | 04/17/08 | 04/25/08 | |
| 08CE12-87 | 557402 | OEP-MW-016S | 04/18/08 | 04/25/08 | 04/25/08 |
| 08CE12-89 | 557405 | OEP-SW-02 | 04/18/08 | 04/27/08 | 04/25/08 |
| 08CE12-91 | 557410 | OEP-JS-014 | 04/18/08 | 04/26/08 | |

The laboratory reported the results of 46 volatile analytes. Only the following 36 volatile analytes were requested in the SAS contract and only these analytes will be discussed in the following validation report.

| | | |
|-----------------------|-------------------------|-----------------------------|
| Acetone | Benzene | Bromodichloromethane |
| Bromoform | Bromomethane | 2-Butanone (MEK) |
| Carbon disulfide | Carbon tetrachloride | Chlorobenzene |
| Chloroethane | Chloroform | Chloromethane |
| Dibromochloromethane | 1,1-Dichloroethane | 1,2-Dichloroethane |
| 1,1-Dichloroethene | Cis-1,2-Dichloroethene | Trans-1,2-Dichloroethene |
| 1,2-Dichloropropane | Cis-1,3-Dichloropropene | Trans-1,3-Dichloropropene |
| Ethylbenzene | 2-Hexanone | 4-Methyl-2-pentanone (MIBK) |
| Methylene chloride | Styrene | 1,1,2,2-Tetrachloroethane |
| Tetrachloroethene | Toluene | 1,1,1-Trichloroethane |
| 1,1,2-Trichloroethane | Trichloroethene | Vinyl chloride |
| [Xylenes, total] | M & p-Xylene | o-Xylene |
| Isopropylbenzene | Methyl tert-butyl ether | |

The method blanks for the SW-846 Method 8260B analyses are MB-558232, MB-558272 and MB-559892. In addition to the method blanks there are four (4) VOC Continuing Calibration Blanks (CCBs); CCB1-04/23/08, CCB2-04/24/08, CCB3-04/26/08 and CCB4-04/27/08. The MEE method blanks are MB-560172 and MB-560670 for the Mod RSK 175 analyses. In addition to the method blanks there are two (2) MEE Continuing Calibration Blanks (CCBs); CCB-04/25/08 and CCB-04/24/08.

Samples 08CE12-23, 08CE12-61 and 08CE12-76 are the parent samples used for the VOC Matrix Spike / Matrix Spike Duplicate analyses. Samples 08CE12-23 and 08CE12-76 are the parent samples used for the MEE Matrix Spike / Matrix Spike Duplicate analyses.

The VOC laboratory control samples are LCS-558239, LCS-559343 and LCS-559891. The VOC laboratory control duplicate samples are LCSD-558275, LCSD-559351 and LCSD-561364. The MEE laboratory control samples are LCS-560171, LCS-560175 and LCS-560671. The MEE laboratory control sample duplicate is LCSD-560674.

Twelve (12) samples; 08CE12-03, 08CE12-16, 08CE12-31, 08CE12-34, 08CE12-41, 08CE12-47, 08CE12-63, 08CE12-64, 08CE12-68, 08CE12-78, 08CE12-83 and 08CE12-91 are identified as Trip Blanks. Sample 08CE12-54 is identified as an Equipment Blank. Sample 08CE12-52 is identified as a Field Blank. Sample 08CE12-08 is a field replicate of 08CE12-06. Sample 08CE12-11 is a field replicate of 08CE12-10. Sample 08CE12-19 is a field replicate of 08CE12-17. Sample 08CE12-27 is a field replicate of 08CE12-25. Sample 08CE12-81 is a field replicate of 08CE12-74. Sample 08CE12-86 is a field replicate of 08CE12-85.

The VOA and MEE analyses were performed within the technical holding time of 14 days after sample collection; therefore, the results are acceptable. The VOA analyses were performed within the technical holding time of 14 days after sample collection; therefore, the results are acceptable.

1. HOLDING TIME

Sixty (60) preserved water samples listed in the following table were collected April 14 - 18, 2008. CT Laboratories of Baraboo, Wisconsin received the samples April 15 - 19, 2008. All samples were received intact and properly cooled. Sixty (60) samples were analyzed April 22 - 27, 2008 by SW-846 Method 8260 for the volatile list of organic analytes identified in the SAS contract for estimated dates of collection January 2007 through March 2011. Thirty-one (31) samples were analyzed April 22 - 25, 2008 by RSK 175 for Methane, Ethane and Ethene as identified in the SAS contract for estimated dates of collection January 2007 through March 2011.

The VOA and MEE analyses were performed within the technical holding time of 14 days after sample collection; therefore, the results are acceptable. The VOA analyses were performed within the technical holding time of 14 days after sample collection; therefore, the results are acceptable.

2. GC/MS TUNING AND GC INSTRUMENT PERFORMANCE

VOC: The GC/MS tuning for SW-846 Method 8260B complied with the mass list and ion abundance criteria for BFB, and all samples were analyzed within the twelve (12) hour periods for instrument performance checks.

MEE: All GC/FID calibration complied with the amount and area for the MEE (Methane-Ethane-Ethene) standards. All samples were analyzed within the twelve (12) hour periods for instrument performance checks; therefore, the results are acceptable.

3. CALIBRATION

VOC: A 7-point calibration curve (0.2/2.0, 0.4/4.0, 1.0/10.0, 2.0/20.0, 4.0/40.0, 6.0/60.0 and 8.0/80.0 µg/L) was performed on April 21, 2008. All %RSDs were less than 15%; therefore, the results do not require any qualification for this criterion.

The average RRFs for Acetone and 2-Butanone in the initial and continuing calibrations were less than 0.05 but greater than the minimum RRF of 0.01 currently used in SOW SOM01.1. The average RRFs for all surrogates 1,2-Dichloroethane-d₄, Bromofluorobenzene, Dibromofluoromethane and Toluene-d₈ were mostly less than 0.05 and less than the minimum RRF of 0.05 currently used in SOW SOM01.1. All %Ds were greater than 20%. Sample results are not qualified based on the RRF values or %D of the surrogates alone.

Continuing Calibrations were conducted at the start of every analytical sequence. All analytes are evaluated for %Ds less than 20%. No minimum RRF values were identified in the SAS contract.

The following samples are associated with continuing calibrations where the analyte has %Ds greater than 20%. Detected compounds should be qualified "J".

Methylene chloride

08CE12-23MS, 08CE12-23MSD, 08CE12-61MS, 08CE12-61MSD, 08CE12-76, 08CE12-76MS, 08CE12-76MSD, LCS-558239, LCSD-558275, LCS-559343, LCSD-559351, LCS-559891, LCSD561364

The following samples are associated with continuing calibrations where the analyte has %Ds greater than 20%. Non-detected quantitation limits should be qualified "UJ".

Methylene chloride

08CE12-01, 08CE12-03, 08CE12-04, 08CE12-06, 08CE12-08, 08CE12-10, 08CE12-11, 08CE12-12, 08CE12-14, 08CE12-16, 08CE12-17, 08CE12-19, 08CE12-21, 08CE12-23, 08CE12-25, 08CE12-27, 08CE12-29, 08CE12-30, 08CE12-31, 08CE12-32, 08CE12-34, 08CE12-35, 08CE12-37, 08CE12-39, 08CE12-41, 08CE12-42, 08CE12-44, 08CE12-45, 08CE12-46, 08CE12-47, 08CE12-48, 08CE12-50, 08CE12-52, 08CE12-54, 08CE12-56, 08CE12-58, 08CE12-60, 08CE12-61, 08CE12-62, 08CE12-63, 08CE12-64, 08CE12-65, 08CE12-67, 08CE12-68, 08CE12-69, 08CE12-71, 08CE12-72, 08CE12-73, 08CE12-74, 08CE12-78, 08CE12-79, 08CE12-81, 08CE12-83, 08CE12-84, 08CE12-85, 08CE12-86, 08CE12-87, 08CE12-89, 08CE12-91, MB-558232, MB-558272, MB559892

MEE: A 7-pt Initial Calibration curve (2, 5, 10, 20, 50, 100 and 200 ppmV) was performed on February 8, 2008 and evaluated for a Goodness of Fit (correlation coefficient) ≥ 0.995 . All %RSDs were less than 15%; therefore, the results do not require any qualification.

Continuing calibrations were analyzed on April 24, 2008 and April 25, 2008 at the appropriate frequency of 1 CCV after every 10 field samples. All %Ds were less than 20%; therefore, the results do not require any qualification.

4. BLANKS

VOC: The method blanks for the SW-846 Method 8260B analyses are MB-558232, MB-558272 and MB-559892. In addition to the method blanks there are four (4) VOC Continuing Calibration Blanks (CCBs); CCB1-04/23/08, CCB2-04/24/08, CCB3-04/26/08 and CCB4-04/27/08. The samples associated with each blank were determined from the Volatile Organic Instrument Performance Check Forms. Copies of the Form 5As are included with the hardcopy validation package.

Method blanks MB-558232, MB-558272 and MB-559892 contained no target analytes; therefore no qualification is required for the samples associated with these method blanks.

CCB1 (04/23/08) contained Chloroethane at 0.0742 µg/L. CCB2 (04/24/08) contained Chloromethane at 0.0586 µg/L and Acetone at 1.9457 µg/L. CCB3 (04/26/08) contained Chloromethane at 0.0754 µg/L and Acetone at 2.3294 µg/L. CCB4 (04/27/08) contained Methylene chloride at 1.0898 µg/L. The concentrations of Chloromethane were less than the reporting limits of 0.2 µg/L in the following samples. The presence of the analyte should be qualified "U" and elevated to the RL as resulting from continuing calibration blank contamination.

Chloromethane
08CE12-34, 08CE12-47, 08CE12-63, 08CE12-74, 08CE12-91

Sample 08CE12-52 is identified as a Field Blank. The field blank contained Chloromethane at 0.060 µg/L and Chloroform at 0.93 µg/L. The concentrations of the analytes were less than the reporting limits of 0.2 µg/L in the following samples. The presence of the analytes should be qualified "U" and elevated to the RL as resulting from field blank contamination.

Chloromethane
08CE12-21, 08CE12-29, 08CE12-35, 08CE12-60, 08CE12-61, 08CE12-62,
08CE12-65, 08CE12-67, 08CE12-81, 08CE12-84, 08CE12-85, 08CE12-86

Chloroform
08CE12-61

Twelve (12) samples; 08CE12-03, 08CE12-16, 08CE12-31, 08CE12-34, 08CE12-41, 08CE12-47, 08CE12-63, 08CE12-64, 08CE12-68, 08CE12-78, 08CE12-83 and 08CE12-91 are identified as Trip Blanks. The trip blanks contained no target analytes; therefore no qualification is required for this criterion.

MEE: The MEE method blanks are MB-560172 and MB-560670 for the Mod RSK 175 analyses. In addition to the method blanks there are two (2) MEE Continuing Calibration Blanks (CCB); CCB-04/25/08 and CCB-04/24/08. Continuing Calibration Blank – 04/25/08 contained Methane at 0.07 µg/L.

None of the Method Blank had any contaminants; therefore, the results are acceptable. The Volatile Method Blank Summaries for Analytical Method Mod RSK 175 list the samples associated with each method blank.

Sample 08CE12-52 is identified as a Field Blank and it contained no MEE analytes.

5. SYSTEM MONITORING COMPOUND AND SURROGATE RECOVERY

VOC: All SW-846 Method 8260B volatile surrogate compounds (1,2-Dichloroethane-d₄, Bromofluorobenzene, Dibromofluoromethane, Toluene-d₈) were within the QC limits (75-135%) for all VOC samples.

MEE: Surrogate recoveries are not applicable to RSK-175 analyses.

6A. MATRIX SPIKE/MATRIX SPIKE DUPLICATE

VOC: Samples 08CE12-23, 08CE12-61 and 08CE12-76 are the parent samples used for the VOC Matrix Spike / Matrix Spike Duplicate analyses.

The %recoveries for Vinyl chloride were greater than the upper limit of 130% in samples 08CE12-23MS and 08CE12-23MSD. The %recoveries for Trichloroethene were below the lower limit of 60% and greater than or equal to 20% in samples 08CE12-23MS and 08CE12-23MSD. The RPD was greater than 30% for Trichloroethene. The detection of Vinyl chloride and Trichloroethene in the unspiked sample, 08CE23-23, should be qualified "J".

The %recoveries for Vinyl chloride were greater than the upper of 130% in samples 08CE12-61MS and 08CE12-61MSD. The %recovery for cis-1,2-Dichloroethene was greater than the upper limit of 130% in sample 08CE12-61MS. The %recoveries for Methylene chloride, m & p-Xylene and o-Xylene were less than the lower limit 60% and greater than or equal to 20% in samples 08CE12-61MS and 08CE12-61MSD. The %recoveries of Styrene were less than 20% in samples 08CE12-61MS and 08CE12-61MSD. All RPDs were less than 30%. The detections of Vinyl chloride and cis-1,2-Dichloroethene in the unspiked sample, 08CE12-61, should be qualified "J". The non-detection of Methylene chloride, m & p-Xylene and o-Xylene in the unspiked sample, 08CE12-61, should be qualified "UJ". The non-detection of Styrene in the unspiked sample, 08CE12-61, should be qualified "R".

The %recoveries for Methylene chloride were greater than the upper of 130% in samples 08CE12-76MS and 08CE12-76MSD. The %recovery for Chloromethane was greater than the upper limit of 130% in sample 08CE12-76MS. The %recoveries for Carbon disulfide were less than the lower limit 60% and greater than or equal to 20% in samples 08CE12-76MS and 08CE12-76MSD. All RPDs were less than 30%. The detections of Methylene chloride and Chloromethane in the unspiked sample, 08CE12-76, should be qualified "J". The non-detection of Carbon disulfide in the unspiked sample, 08CE12-76, should be qualified "UJ".

MEE: Samples 08CE12-23 and 08CE12-76 are the parent samples used for the MEE Matrix Spike / Matrix Spike Duplicate analyses.

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The %recoveries for Methane were greater than the upper of 130% in samples 08CE12-23MS and 08CE12-23MSD. All RPDs were less than 30%. The detection of Methane in the unspiked sample, 08CE12-23, should be qualified "J".

The %recovery for Methane was below 20% in sample 08CE12-76MS. All RPD for Methane was greater than 30%. The detection of Methane in the unspiked sample, 08CE12-76, should be qualified "J".

6B. LABORATORY CONTROL SAMPLES

VOC: The VOC laboratory control samples are LCS-558239, LCS-559343 and LCS-559891. The VOC laboratory control duplicate samples are LCSD-558275, LCSD-559351 and LCSD-561364.

LCS-558239 and LCSD-558275 were analyzed April 22 - 23, 2008. The percent recoveries for all compounds were within the QC limits (60 – 130%). All RPDs were less than 30%. The samples associated with these LCS/LCSD samples, did not require any qualification.

LCS-559343 and LCSD-559351 were analyzed April 24, 2008. The percent recoveries for all compounds were within the QC limits (60 – 130%). The RPD for Methylene chloride was greater than 30%. The detection of Methylene chloride samples 08CE12-61MS and 08CE12-61MSD should be qualified "J". The quantitation limits for the non-detected Methylene chloride in the following associated samples should be qualified "UJ".

Methylene chloride

08CE12-30, 08CE12-44, 08CE12-45, 08CE12-46, 08CE12-48, 08CE12-50, 08CE12-52, 08CE12-54, 08CE12-56, 08CE12-58, 08CE12-60, 08CE12-61, 08CE12-61MS, 08CE12-61MSD, 08CE12-62, 08CE12-65, 08CE12-67, 08CE12-69, 08CE12-71, 08CE12-72, 08CE12-73, 08CE12-74

LCS-559891 and LCSD-561364 were analyzed April 25 - 26, 2008. The percent recoveries for Methylene chloride were greater than 130%. All RPDs were less than 30%. The detection of Methylene chloride in samples 08CE12-76, 08CE12-76MS and 08CE12-76MSD should be qualified "J". The quantitation limits for the non-detected Methylene chloride is ultimately qualified "UJ" because all the calibration criteria were not met.

Methylene chloride

08CE12-03, 08CE12-16, 08CE12-31, 08CE12-34, 08CE12-41, 08CE12-47, 08CE12-63, 08CE12-64, 08CE12-68, 08CE12-76, 08CE12-76MS, 08CE12-76MSD, 08CE12-78, 08CE12-79, 08CE12-81, 08CE12-83, 08CE12-84, 08CE12-85, 08CE12-86, 08CE12-87, 08CE12-89, 08CE12-91

MEE: The MEE laboratory control samples are LCS-560171, LCS-560175 and LCS-560671. The MEE laboratory control sample duplicate is LCSD-560674. All recoveries were within the QC limits of 60 – 130%. The RPDs between LCS-560171 and LCSD-560175 were within the QC limits of 30%. No LCSD samples were analyzed for LCS-560571 and LCS-560674.

7. FIELD BLANK AND FIELD DUPLICATE

VOC: Twelve (12) samples; 08CE12-03, 08CE12-16, 08CE12-31, 08CE12-34, 08CE12-41, 08CE12-47, 08CE12-63, 08CE12-64, 08CE12-68, 08CE12-78, 08CE12-83 and 08CE12-91 are identified as Trip Blanks. The trip blanks contained no target analytes; therefore no qualification is required for this criterion.

Sample 08CE12-54 is identified as an Equipment Blank. The equipment blank contained Chloroform at 0.98 µg/L.

Sample 08CE12-52 is identified as a Field Blank. The field blank contained Chloromethane at 0.060 µg/L and Chloroform at 0.93 µg/L.

Sample 08CE12-08 is a field replicate of 08CE12-06. Sample 08CE12-11 is a field replicate of 08CE12-10. Sample 08CE12-19 is a field replicate of 08CE12-17. Sample 08CE12-27 is a field replicate of 08CE12-25. Sample 08CE12-81 is a field replicate of 08CE12-74. Sample 08CE12-86 is a field replicate of 08CE12-85. Sample results and RPDs for these replicate pairs are summarized in the following table.

| Analyte | 08CE12-06 | 08CE12-08 | RPDs |
|------------------------|-----------|-----------|--------|
| | Df = 1.0 | Df = 1.0 | |
| 1,1-Dichloroethene | 10 | 7.9 | 23.5 % |
| 1,1-Dichloroethane | 11 | 11 | 0.0 % |
| 1,1,1-Trichloroethane | 140 | 130 | 7.4 % |
| Bromodichloromethane | 5.9 | 6 | 1.7 % |
| Trichloroethene | 840 | 810 | 3.6 % |
| Cis-1,2-Dichloroethene | 84 | 82 | 2.4 % |

| Analyte | 08CE12-10 | 08CE12-11 | RPDs |
|--------------------|-----------|-----------|---------|
| | Df = 1.0 | Df = 1.0 | |
| Acetone | 0.0 | 1.9 | 200.0 % |
| 1,2-Dichloroethane | 0.25 | 0.28 | 11.3 % |

| Analyte | 08CE12-17 | 08CE12-19 | RPDs |
|---------|-----------|-----------|---------|
| | Df = 1.0 | Df = 1.0 | |
| Acetone | 0 | 2 | 200.0 % |

| Analyte | 08CE12-25 | 08CE12-27 | RPDs |
|--------------------------|-----------|-----------|---------|
| | Df = 1.0 | Df = 1.0 | |
| Chloromethane | 0.2 | 0.0 | 200.0 % |
| Vinyl chloride | 0.58 | 0.58 | 0.0 % |
| 1,1-Dichloroethene | 1.5 | 1.3 | 14.3 % |
| 1,1-Dichloroethane | 6.9 | 6.0 | 14.0 % |
| 1,2-Dichloroethane | 0.099 | 0.0 | 200.0 % |
| Trichloroethane | 14 | 14 | 0.0 % |
| Cis-1,2-Dichloroethene | 28 | 28 | 0.0 % |
| Methyl tert-butyl ether | 0.17 | 0.0 | 200.0 % |
| Trans-1,2-Dichloroethene | 1.2 | 0.79 | 41.2 % |

| Analyte | 08CE12-74 | 08CE12-81 | RPDs |
|-------------------------|-----------|-----------|--------|
| | Df = 1.0 | Df = 1.0 | |
| Chloromethane | 0.079 | 0.071 | 10.7 % |
| Trichloroethene | 0.15 | 0.15 | 0.0 % |
| Cis-1,2-Dichloroethene | 0.34 | 0.34 | 0.0 % |
| Methyl tert-butyl ether | 0.27 | 0.29 | 7.1 % |

| Analyte | 08CE12-85 | 08CE12-86 | RPDs |
|---------------|-----------|-----------|---------|
| | Df = 1.0 | Df = 1.0 | |
| Chloromethane | 0.067 | 0.088 | 27.1 % |
| Acetone | 1.7 | 0.0 | 200.0 % |

MEE: Sample 08CE12-52 is identified as a Field Blank and it contained no MEE analytes.

Sample 08CE12-08 is a field replicate of 08CE12-06. Sample 08CE12-19 is a field replicate of 08CE12-17. Sample 08CE12-27 is a field replicate of 08CE12-25. Sample 08CE12-81 is a field replicate of 08CE12-74. Sample results and RPDs for these replicate pairs are summarized in the following table.

| Analyte | 08CE12-06 | 08CE12-08 | RPDs |
|---------|-----------|-----------|--------|
| | Df = 10.0 | Df = 10.0 | |
| Methane | 87 | 93 | 6.7 % |
| | 08CE12-17 | 08CE12-19 | |
| | Df = 1.0 | Df = 1.0 | |
| Methane | 0.69 | 1.4 | 67.9 % |
| | 08CE12-25 | 08CE12-27 | |
| | Df = 4.0 | Df = 4.0 | |
| Methane | 32 | 32 | 0.0 % |

| | | | |
|---------|------------------|------------------|--------|
| | 08CE12-74 | 08CE12-81 | |
| | Df = 5.0 | Df = 10.0 | |
| Methane | 69 | 82 | 17.2 % |

8. INTERNAL STANDARDS

The three internal standard's (Fluorobenzene, Chlorobenzene-d₅, 1,4-Dichlorobenzene-d₄) retention times and area counts for the VOC samples were within the QC limits; therefore, the results are acceptable.

9. COMPOUND IDENTIFICATION

After reviewing the mass spectra and chromatograms it appears that all VOC and MEE compounds were properly identified.

10. COMPOUND QUANTITATION AND REPORTED DETECTION LIMITS

VOC: All samples were waters and dilutions were run. The reporting limits for the VOC compounds were less than or equal to the reporting limits specified in the SAS contract for all analytes; except 1,1,2,2-Tetrachloroethane, cis-1,3-Dichloropropene and trans-1,3-Dichloropropene. The requested reporting limit for cis-1,3-Dichloropropene was 0.016 µg/L and the actual reporting limit was 0.017 µg/L. The requested reporting limit for trans-1,3-Dichloropropene was 0.015 µg/L and the actual reporting limit was 0.017 µg/L. The requested reporting limit for 1,1,2,2-Tetrachloroethane was 0.018 µg/L and the actual reporting limit was 0.019 µg/L. Xylenes (total) was reported as m,p-Xylene and o-Xylene.

The following VOC samples reported analyte concentrations below the SAS reporting limits but above the laboratory's detection limits. The concentrations should be qualified as estimated, "J".

Chloromethane
08CE12-52

Chloroethane, Benzene, Toluene, Chlorobenzene
08CE12-89

Acetone
08CE12-11, 08CE12-14, 08CE12-21, 08CE12-67, 08CE12-85, 08CE12-87

Carbon disulfide, m & p-Xylene, Isopropylbenzene
08CE12-73

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1,1-Dichloroethene
08CE12-35, 08CE12-79

1,1-Dichloroethane
08CE12-87

1,2-Dichloroethane
08CE12-25, 08CE12-60, 08CE12-61, 08CE12-67

1,1,1-Trichloroethane
08CE12-35, 08CE12-65

Trichloroethene
08CE12-29, 08CE12-46, 08CE12-61, 08CE12-62, 08CE12-67, 08CE12-74,
08CE12-81

Cis-1,2-Dichloroethene
08CE12-21, 08CE12-65

Methyl tert-butyl ether
08CE12-25

Trans-1,2-Dichloroethene
08CE12-29, 08CE12-32, 08CE12-45, 08CE12-46, 08CE12-60, 08CE12-62

MEE: The reporting limit for Ethane, Ethene and Methane were less than or equal to 10 µg/L as specified in the SAS contract.

The following MEE samples reported analyte concentrations below the SAS reporting limits but above the laboratory's detection limits. The concentrations should be qualified as estimated, "J".

Ethane
08CE12-23, 08CE12-23MS, 08CE12-23MSD, 08CE12-76MS,
08CE12-76MSD, LCS560171, LCS-560175, LCS-560671, LCSD-560674

Ethene
08CE12-23MS, 08CE12-23MSD, 08CE12-76MS, 08CE12-76MSD, LCS-
560171, LCS-560175, LCS-560671, LCSD-560674

Methane
08CE12-12, 08CE12-17, 08CE12-19, 08CE12-32, 08CE12-50, 08CE12-56,
08CE12-58, 08CE12-65, 08CE12-79, LCS-560171, LCS-560175,
LCS-560671, LCSD-560674

11. SYSTEM PERFORMANCE

GC/MS baseline indicated acceptable performance.

12. ADDITIONAL INFORMATION

The final shipment of samples arrived at the Laboratory on April 21, 2008. The Laboratory Case Narrative was prepared on May 5, 2008 and forwarded by Ch2mHill on May 16, 2008 which is more than 21 calendar days after sample receipt.

Photocopies of the airbills were included with this package. The original sample tags, packing list and airbills should have been sent to CH2M HILL.

Copies of the most recent MDL studies were not included with this data package but MDL (LOD – Level of Detection) values are present on the Laboratory Form Is.

VOC SAS Table II. QC Requirements lists the frequency of audits for method blanks as 'at least one per group of 10 or fewer samples'. The laboratory provided only 3 analyses identified as method blanks and an additional four analyses identified as Continuing Calibration Blanks. Volatile analyses require the analysis of a QC blank on each day of analysis and the volatile analyses spanned a 6-day time period. Inspections of both SW-846 Method 8000 (Determinative Chromatographic Separations, Sec. 7.7 & 8.2) and Method 8260 (Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry, Sec. 8.4) indicate that the terms method blank and continuing calibration blank could describe the same QC sample. As the CCB samples were analyzed daily and followed the Continuing Calibration Verification Standard, the Reviewer regarded them as method blanks for this data package. No Analysis Data Sheets were provided for the CCB samples. Copies of the raw data for these QC samples and the Form 5As (Volatile Organic Instrument Performance Check) are included with the hardcopy validation package.

The methods blanks were also non-compliant with the QC requirements identified in Table II in the following instances;

- a) MB-558272 is associated with 11 samples rather than 10 samples.
- b) MB-559892 is associated with 12 samples rather than 10 samples.
- c) CCB-1 is associated with 13 samples rather than 10 samples.
- d) The concentrations of Acetone detected in CCB3 was greater than the SAS detection limit of 2.0 µg/L.

The following VOC samples had analyte concentrations that exceeded the instruments calibration range. The samples were re-analyzed at various dilutions and only the diluted compound results were reported for the affected samples:

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08CE12-04, 08CE12-06, 08CE12-23, 08CE12-25, 08CE12-79, 08CE12-87,
08CE12-89

The following MEE samples had analyte concentrations that exceeded the instruments calibration range. The samples were re-analyzed at various dilutions and only the diluted compound results were reported for the affected samples:

08CE12-01, 08CE12-04, 08CE12-06, 08CE12-08, 08CE12-21, 08CE12-23,
08CE12-25, 08CE12-27, 08CE12-39, 08CE12-48, 08CE12-69, 08CE12-74,
08CE12-76, 08CE12-81, 08CE12-87, 08CE12-89

Data Qualifier Sheet

For the purpose of defining the flagging nomenclature utilized in this document, the following code letters and associated definitions are provided:

VALUE – if the result is a value greater than or equal to the Contract Required Quantitation Limit (CRQL).

- U Indicates that the compound was analyzed for, but not detected. The sample quantitation limit corrected for dilution and percent moisture is reported.
- J Indicates an estimated value. This flag is used either when estimating a concentration for a tentatively identified compound or when the data indicates the presence of a compound but the result is less than the sample quantitation limit, but greater than zero. The flag is also used to indicate a reported result having an associated QC problem.
- N Indicates presumptive evidence of a compound. This flag is only used for a tentatively identified compound (TIC), where the identification is based on a mass spectral library search.
- R Indicates the data are unusable. (The compound may or may not be present.)
- P Indicates a pesticide/Aroclor target analyte when there is greater than 25% difference for the detect concentrations between the two GC columns. The lower of the two results is reported.
- C Indicates pesticide results that have been confirmed by GC/MS.
- B Indicates the analyte is detected in the associated method blank as well as the sample.
- E Indicates compounds whose concentrations exceeded the calibration range of the instrument.
- D Indicates an identified compound in an analysis has been diluted. This flag alerts the data user to any difference between the concentrations reported in the two analyses.
- A Indicates TICs that are suspected to be aldol condensation products.
- G Indicates the TCLP Matrix Spike Recovery was greater than the upper limit of the analytical method.
- L Indicates the TCLP Matrix Spike Recovery was less than the lower limit of the analytical method.
- T Indicates the analyte is found in the associated TCLP extraction blank as well as in the sample.

X, Y, Z are reserved for laboratory defined flags.

Regional Transmittal Form

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: June 10, 2008

SUBJECT: Review of Data
Received for review on May 23, 2008

FROM: Stephen L. Ostrodka, Chief (SRT-4J)
Superfund Field Services Section

TO: Data User: CH2M HILL

We have reviewed the data for the following case:

SITE NAME: Oconomowoc Electroplating Company (WI)

CASE NUMBER: 08CE12 SDG NUMBER: 66005-INO

Number and Type of Samples: 31 water samples

Sample Numbers: 08CE12-01, -04, -06, -08, -12, -14, -17, -19, -21, -23, -25, -27, -32, -35, -37, -37, -39, -42, -48, -50, -52, -54, -56, -58, -65, -69, -74, -76, -79, -81, -87, -89

Laboratory: CT Laboratories Hrs. for Review: _____

Following are our findings:

CC: Howard Pham
Region 5 TOPO
Mail Code: SRT-4J

Case: 08CE12
Site: Oconomowoc Electroplating

SDG: 66005-INO
Laboratory: CT Laboratories

Narrative

The laboratory's portion of this case contains 31 water samples (see TABLE 1). The samples were collected between April 14 and 18, 2008. They were analyzed for alkalinity, total organic carbon (TOC), sulfide, nitrate, sulfate and chloride. All sample results are reported to the MDL. The samples were analyzed using SW846 9056 (anions), 9060 (total organic carbon), EPA 310.2 (alkalinity), and 376.1 (sulfide) analysis procedures.

Evidential Audit: All reporting forms provided are CLP-like documents. All documents provided are copies. No location is noted for the originals. No DC-1 or DC-2 forms or sample tags were provided.

No MDL summaries were provided. It is unknown when MDLs were performed. MDL (LOD) values recorded on the results Form 1 were used for evaluation of the data. MDL and RL values on Form 1s are equal.

Alkalinity: The SAS requires that the lowest calibration point be run at 10.0 mg/L. The lowest point performed was 25 mg/L. All sample results were above 25 mg/L except samples 08CE12-52 and 08CE12-54, which were non-detects. These samples are flagged "UJ". All other alkalinity results are acceptable.

Ammonia: No defects were found. All ammonia results are acceptable

Chloride: No defects were found. All chloride results are acceptable.

Nitrate: No defects were found. All nitrate results are acceptable.

Ortho-phosphate: No defects were found. All ortho-phosphate results are acceptable.

Sulfate: No defects were found. All nitrate results are acceptable

Sulfide: No defects were found. All sulfide results are acceptable.

TOC: The SAS requires a low standard be run to confirm the reporting limit of 1.0 mg/L. This was not performed. The lowest calibration standard was 10 mg/L. All TOC results, except 08CE12-02, -17, -65, and -65 Dup, are below 10 mg/L and are estimated "J" for detects and "UJ" for non-detects.

Other comments: Samples 08CE12-06/-08, 08CE12-17/-19, 08CE12-25/-27 and 08CE12-74/-81 were identified as field duplicate pairs. Duplicates were evaluated according to the same criteria as laboratory duplicates. Samples 08CE12-06/-08 and 08CE12-74/-81 were outside the acceptance criteria for nitrate. All other tests showed good correlation. Sample 08CE12-52 was identified as field blank. Sample 08CE12-54 was identified as equipment blank. The field blank contains TOC

Reviewed by: Paul Little (TechLaw/ESAT)

Date: 06/10/2008

Case: 08CE12
 Site: Oconomowoc Electroplating

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above the reporting limit (1.3 mg/L). The equipment blank showed no contamination.

TABLE 1

| <i>Lab ID</i> | <i>EPA sample ID</i> | <i>Sample location</i> | <i>Cooler Tem.</i> | <i>Collection date</i> | <i>Collection time</i> | <i>Received date</i> |
|---------------|----------------------|------------------------|--------------------|------------------------|------------------------|----------------------|
| 556236 | 08CE12-01 | OPE-MW-003D | 4.8 | 4/14/2008 | 12:20 | 4/15/2008 |
| 556261 | 08CE12-04 | OPE-MW-103S | 4.8 | 4/14/2008 | 15:15 | 4/15/2008 |
| 556263 | 08CE12-06 | OEP-MW-103D | 4.8 | 4/14/2008 | 15:40 | 4/15/2008 |
| 556265 | 08CE12-08 | OEP-MW-103DFR | 4.8 | 4/14/2008 | 15:40 | 4/15/2008 |
| 556269 | 08CE12-12 | OEP-MW-015D | 4.0 | 4/14/2008 | 16:40 | 4/15/2008 |
| 556271 | 08CE12-14 | OEP-MW-015S | 4.0 | 4/14/2008 | 16:45 | 4/15/2008 |
| 556274 | 08CE12-17 | OEP-SW-01 | 4.0 | 4/14/2008 | 17:15 | 4/15/2008 |
| 556267 | 08CE12-19 | OEP-SW-01FR | 4.0 | 4/14/2008 | 17:15 | 4/15/2008 |
| 556502 | 08CE12-21 | OEP-MW-105B | 4.1 | 4/15/2008 | 10:15 | 4/16/2008 |
| 556504 | 08CE12-23 | OEP-MW-105S | 4.1 | 4/15/2008 | 10:20 | 4/16/2008 |
| 556514 | 08CE12-25 | OEP-MW-105D | 5.1 | 4/15/2008 | 11:15 | 4/16/2008 |
| 556516 | 08CE12-27 | OEP-MW-105DFR | 5.1 | 4/15/2008 | 11:15 | 4/16/2008 |
| 556518 | 08CE12-32 | OEP-MW-013D | 5.1 | 4/15/2008 | 13:35 | 4/16/2008 |
| 556521 | 08CE12-35 | OEP-MW-013S | 5.1 | 4/15/2008 | 13:50 | 4/16/2008 |
| 556507 | 08CE12-37 | OEP-MW-012D | 3.8 | 4/15/2008 | 14:40 | 4/16/2008 |
| 556509 | 08CE12-39 | OEP-MW-012S | 3.8 | 4/15/2008 | 14:50 | 4/16/2008 |
| 556512 | 08CE12-42 | OEP-MW-012B | 3.8 | 4/15/2008 | 15:30 | 4/16/2008 |
| 556809 | 08CE12-48 | OEP-MW-001D | 3.0 | 4/16/2008 | 09:55 | 4/17/2008 |
| 556811 | 08CE12-50 | OEP-MW-001S | 3.0 | 4/16/2008 | 10:40 | 4/17/2008 |
| 556799 | 08CE12-52 | OEP-FB-001 | 3.4 | 4/16/2008 | 10:55 | 4/17/2008 |
| 556800 | 08CE12-54 | OEP-EB-001 | 3.4 | 4/16/2008 | 11:05 | 4/17/2008 |
| 556813 | 08CE12-56 | OEP-MW-004D | 3.0 | 4/16/2008 | 10:00 | 4/17/2008 |
| 556815 | 08CE12-58 | OEP-MW-004S | 3.0 | 4/16/2008 | 10:50 | 4/17/2008 |
| 556803 | 08CE12-65 | OEP-SW-03 | 3.4 | 4/16/2008 | 13:20 | 4/17/2008 |
| 556805 | 08CE12-69 | OEP-MW-015B | 3.4 | 4/16/2008 | 15:00 | 4/17/2008 |
| 556265 | 08CE12-74 | OEP-MW-101B | 3.1 | 4/17/2008 | 10:00 | 4/18/2008 |
| 557223 | 08CE12-76 | OEP-MW-005D | 3.1 | 4/17/2008 | 10:20 | 4/18/2008 |
| 557215 | 08CE12-79 | OEP-MW-102D | 3.1 | 4/17/2008 | 10:00 | 4/18/2008 |
| 557217 | 08CE12-81 | OEP-MW-101BFR | 3.1 | 4/17/2008 | 10:00 | 4/18/2008 |
| 557402 | 08CE12-87 | OEP-MW-016S | 3.2 | 4/18/2008 | 11:00 | 4/19/2008 |
| 557405 | 08CE12-89 | OEP-SW-02 | 3.2 | 4/18/2008 | 11:10 | 4/19/2008 |

Data Qualifier Sheet

| <u>Qualifiers</u> | <u>Data Qualifier Definitions</u> |
|-------------------|---|
| U | The analyte was analyzed for, but was not detected above the reported sample quantitation limit. |
| J | The result is an estimated quantity. The associated numerical value is the approximate concentration of the analyte in the sample. |
| J+ | The result is an estimated quantity, but the result may be biased high. |
| J- | The result is an estimated quantity, but the result may be biased low. |
| R | The data are unusable. The sample results are rejected due to serious deficiencies in meeting Quality Control (QC) criteria. The analyte may or may not be present in the sample. |
| UJ | The analyte was analyzed for, but not detected. The reported quantitation limit is approximate and may be inaccurate or imprecise. |