

January 21, 2021

Mr. Kevin McKnight
Northeast Region
Wisconsin Department of Natural Resources
625 East County Road Y, Suite 700
Oshkosh, WI 54901

**Subject: 2020 Groundwater Monitoring Report
Former Tecumseh Products, Former Plating Line Area
New Holstein, Wisconsin
BRRTS# 02-08-363333**

Dear Mr. McKnight:

TRC continues groundwater monitoring specific to the former plating line area at the former Tecumseh Products facility in New Holstein, Wisconsin (BRRTS #: 02-08-363333). On November 5, 2020, TRC completed groundwater sampling at monitoring wells specific to the former plating line area to verify a stable residual chromium plume and confirm that the chromium plume is naturally attenuating. This letter presents the results of the data collected during the groundwater monitoring event, in accordance with the 2017 *Long Term Groundwater Monitoring Plan*. A technical review and response from the Wisconsin Department of Natural Resources (WDNR) is not requested, and this report is being submitted to the State's file for long-term monitoring plans.

BACKGROUND

Evaluation of the groundwater data through June 2017 indicated that 1) the contaminant plume remains stable and has not shown any migration from previous sampling events, 2) the groundwater impacts do not pose a threat to human health or the environment, and 3) that natural attenuation continues to control the migration of chromium impacts and is still a viable remedy for the site.

Since the groundwater contaminant trends in source area wells (TEC-3, TEC-4, and NH-26) do not allow for case closure after the 2019 sampling event, TRC submitted the October 2019 *Remedial Action Options Report* (RAOR) to address residual hexavalent chromium sources in groundwater. The selected remedy is soil mixing and in-situ chemical reduction (ISCR) within the unconsolidated soils once demolition of the facility has taken place. The timing/sequencing of the demolition is incorporated into the selected remedy to make best use of the accessibility and enhanced safety benefits of conducting the remediation after the Site structures are demolished. Monitored natural attenuation (MNA) will be utilized after the initial goals of the active remedial actions are achieved. The Wisconsin Department of Natural Resources (WDNR) conditionally approved the RAOR in a letter dated December 3, 2019, including that

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annual groundwater sampling as approved in the 2017 *Long Term Groundwater Monitoring Plan* be continued until the RAOR is implemented.

Demolition activities have not taken place, and therefore, the RAOR has not been implemented in 2020. Hence, TRC completed an annual groundwater sampling event in 2020.

SUMMARY OF GROUNDWATER MONITORING

Groundwater Monitoring Program

On November 5, 2020, TRC completed a groundwater gauging and sampling event at the former Tecumseh chromium line remediation area. Prior to groundwater sampling, water levels were measured at each monitoring well with an oil-water interface probe.

Groundwater sampling was completed at monitoring wells MW-E, TEC-3, TEC-4, MW-8, NH-7, NH-26, MW-A, and MW-B. In addition, TRC also sampled MW-5, TEC-1 and MW-F to evaluate for submittal of case closure. As noted in previous reports, monitoring well MW-24 was destroyed.

Groundwater samples were collected using low-flow sampling techniques with an Alexis peristaltic pump and YSI Pro Dss Sonde M4 multi-parameter meter and flow cell. During well purging, field parameters (temperature, conductivity, turbidity, dissolved oxygen, pH and oxidation/reduction potential [ORP]) were measured and allowed to stabilize prior to sampling. Low-flow sampling stabilization forms are provided in **Attachment A**. Groundwater samples were field filtered with a 0.52 micron filter and submitted for laboratory analysis of total dissolved chromium using method EPA 6010. All samples were packaged in a cooler and shipped to Pace Analytical Services, LLC in Green Bay, Wisconsin (Pace) under standard chain of custody procedures.

Purge water was drummed.

Groundwater Elevations

Table 1 presents a summary of water level measurements collected during events between 2009 and 2020 and **Figure 1** presents the groundwater elevation contours for the November 2020 sampling event. The groundwater gradient is oriented from the east/southeast portion of the facility, towards the west. Groundwater elevations were similar to previous groundwater monitoring events. Groundwater continues to exhibit an overall westerly flow direction as illustrated on **Figure 1**.

Groundwater Quality Assurance/Quality Control Results

TRC performed a Quality Assurance/Quality Control (QA/QC) review of the laboratory report, in regards to analyses, procedures, and protocols performed by Pace. Samples were received by Pace within the mandated timeframe and maintained at the proper temperature. Based on the results, there were no major insufficiencies regarding surrogate recoveries, analyte detections or sample duplicate recoveries. Based on an internal review by TRC, all data were considered acceptable. QC data indicate that measurement data are sufficient to meet method

quality objectives, data are defensible, and QC mechanisms were effective in ensuring measurement data reliability.

RESULTS AND DISCUSSION

The groundwater analytical results are summarized in **Table 2**, which contains total dissolved chromium results from the November 2020 groundwater event, as well as previous analytical results. The low-flow stabilization geochemical results indicate that the dissolved oxygen is ranging between 1 and 6 milligrams per liter (mg/L) and an ORP is generally greater than 200 millivolts (mV). The pH of the groundwater is basically neutral, ranging between 7 and 8 S.U. There is no obvious difference between the geochemistry of the source area as compared to down-gradient. The distribution of total dissolved chromium in groundwater is shown on **Figure 2**. The monitoring wells with total dissolved chromium exceeding the ES are shown on **Figure 2**. The laboratory analytical results are provided in **Attachment B**.

Total dissolved chromium concentrations exceeded the ES in 8 of the 11 monitoring wells in November 2020 (MW-5, MW-A, MW-E, TEC-1, TEC-3, TEC-4, NH-7 and NH-26). Monitoring well MW-B exceeded the Preventative Action Limit (PAL) in November 2020, but not the ES. The remaining two monitoring wells MW-F and MW-8 were below the ES and PAL.

In order to assess the current subsurface conditions of the Site, an evaluation of the dissolved chromium concentration trends has been completed. The historic distribution of total dissolved chromium in groundwater is shown on **Figure 2**. The extent of the total dissolved chromium has receded over time. The northern extent of dissolved chromium is likely not related to migration; dissolved chromium was likely there beforehand, which is supported by the more recent data points. The trend analysis charts were completed on monitoring wells which exceeded the ES. The trend analysis charts are provided in **Attachment C**. Based on these charts, the below significant points can be made.

Source area monitoring wells NH-26, TEC-3, and TEC-4 increased over concentrations from the previous groundwater sampling event; however, these concentrations appear to fluctuate and have not exceeded the historically highest concentrations at each of these monitoring wells. The high chromium concentration received during the April 22, 2016 groundwater sampling event at TEC-4 appears to be an anomaly.

Total dissolved chromium concentrations in down-gradient monitoring wells MW-E and MW-A increased. While these concentrations have increased, they have not increased beyond historically high concentrations in such a way that would be indicative of an expanding plume. In addition, total dissolved chromium concentrations have continued to decrease at west periphery monitoring well TEC-1 and have remained below detection levels at southwest periphery monitoring well MW-F which provides additional support for a stable chromium plume.

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The total dissolved chromium concentration in down-gradient monitoring well NH-7 also increased during the 2020 groundwater sampling event; however, these concentrations are still relatively low. Monitoring well NH-7 is near to and upgradient of MW-24 and NH-10, both of which have historical chromium results below the PAL and ES.

CONCLUSIONS AND RECOMMENDATIONS

Based on the evaluation of recent groundwater data, the overall extent of the dissolved contaminant plume remains relatively stable. Additionally, monitoring wells MW-B and MW-8 now lie outside of the impacted area above the ES indicating that the dissolved chromium has receded over time. Monitoring well MW-5 appears to fluctuate between the ES and PAL. These results confirm that MNA continues to be effective in controlling and mitigating the migration of residual chromium impacts to groundwater and remains a viable remedy for the site.

The groundwater impacts do not pose a threat to human health or the environment. Moreover, there is a deed restriction recorded to the property limiting certain activities and uses that further acts to protect human health and the environment.

TRC will continue to conduct annual groundwater monitoring and sampling with the next round scheduled for fall/winter 2021 to further assess contaminant trends and confirm the effectiveness of MNA. Samples will be collected and analyzed for total dissolved chromium from monitoring wells MW-E, TEC-3, TEC-4, MW-8, NH-7, NH-26, MW-A, and MW-B..

If you have any questions, please contact me at (312) 578-0870, extension 11910.

Sincerely,



Chris Harvey, PE
Program Manager

TABLES

Table 1. Groundwater Elevations 2009 - 2020

Table 2. Summary of Groundwater Analytical Data

FIGURES

Figure 1. Groundwater Contour Map – November 2020

Figure 2. Total Dissolved Chromium Isoconcentration Map by Year

ATTACHMENTS

Attachment A. Low-Flow Sampling Logs

Attachment B. Laboratory Analytical Report (November 5, 2020)

Attachment C. Trend Analysis Charts

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cc: Mr. Jason Smith/Tecumseh Products Co. – Paris, TN
Mr. Curtis Toll/Greenberg Traurig, LLP – Philadelphia
Mr. Ron Bock/TRC – Irvine, CA

TABLES

Table 1. Groundwater Level Elevations 2009-2020

Location	Top of Casing (TOC) Elevation (ft MSL)	June 8, 2009		September 23, 2009		December 28 & 29, 2009		March 29 & 30, 2010		March 18 & 19, 2011		May 15, 2012	
		Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation
MW-1	932.60	6.13	926.47	8.80	923.80	3.71	928.89	4.98	927.62	4.92	927.68	2.77	929.83
NH-2	935.34	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	932.24	4.32	927.92	7.55	924.69	2.56	929.68	3.77	928.47	3.56	928.68	2.67	929.57
MW-5	931.81	4.30	927.51	7.24	924.57	3.10	928.71	3.27	928.54	2.99	928.82	2.39	929.42
MW-6	931.90	5.23	926.67	8.45	923.45	3.17	928.73	3.72	928.18	3.46	928.44	2.85	929.05
NH-7	935.42	Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012	
MW-8	931.89	4.07	927.82	6.73	925.16	2.99	928.90	3.33	928.56	3.11	928.78	2.63	929.26
MW-9	931.54	7.04	924.50	10.65	920.89	4.71	926.83	4.58	926.96	--	--	--	--
NH-10	935.37	--	--	--	--	--	--	--	--	--	--	--	--
NH-25	934.65	Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012	
MW-24	931.07	--	--	--	--	--	--	--	--	--	--	--	--
NH-26	934.76	Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012	
MW-A	932.83	6.78	926.05	9.38	923.45	4.79	928.04	5.62	927.21	5.57	927.26	4.47	928.36
MW-B	932.58	5.69	926.89	8.60	923.98	3.00	929.58	4.40	928.18	4.22	928.36	3.11	929.47
MW-C	931.89	5.88	926.01	9.24	922.65	3.29	928.60	3.86	928.03	3.64	928.25	2.59	929.30
MW-D	941.90	5.81	936.09	9.96	931.94	5.18	936.72	4.04	937.86	--	--	--	--
MW-E	933.31	7.28	926.03	9.81	923.50	6.20	927.11	6.43	926.88	6.33	926.98	5.32	927.99
MW-F	933.83	8.52	925.31	10.93	922.90	7.31	926.52	7.53	926.30	7.52	926.31	6.71	927.12
MW-G	934.37	7.52	926.85	10.66	923.71	7.02	927.35	7.28	927.09	7.21	927.16	5.98	928.39
MW-H	933.63	8.81	924.82	12.40	921.23	9.06	924.57	8.45	925.18	--	--	--	--
TEC-1	932.51	4.20	928.31	6.67	925.84	3.69	928.82	3.89	928.62	3.46	929.05	3.14	929.37
TEC-1A	932.02	14.29	917.73	18.37	913.65	14.66	917.36	13.58	918.44	13.42	918.60	13.17	918.85
TEC-2	931.90	4.67	927.23	7.47	924.43	3.55	928.35	3.68	928.22	3.40	928.50	2.90	929.00
TEC-3	934.62	6.94	927.68	9.07	925.55	6.51	928.11	6.20	928.42	5.94	928.68	5.38	929.24
TEC-4	934.50	7.15	927.35	9.64	924.86	6.12	928.38	6.33	928.17	5.98	928.52	5.35	929.15

MSL - Mean Sea Level

NA* Well underwater and could not be measured

Table 1. Groundwater Level Elevations 2009-2020

Location	Top of Casing (TOC) Elevation (ft MSL)	June 20 & 21, 2013		August 18, 2014		April 22, 2016		September 7, 2016		April 26, 2017		March 21, 2019		November 5, 2020	
		Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation
MW-1	932.60	5.13	927.47	6.80	925.80	4.53	928.07	2.97	929.63	--	--	4.12	928.48	--	--
NH-2	935.34	--	--	3.68	931.66	4.01	931.33	3.65	931.69	3.82	931.52	3.63	931.71	--	--
MW-4	932.24	4.08	928.16	5.62	926.62	3.36	928.88	3.03	929.21	--	--	--	--	--	--
MW-5	931.81	3.70	928.11	4.89	926.92	2.87	928.94	3.35	928.46	--	--	2.81	929.00	3.08	928.73
MW-6	931.90	4.28	927.62	5.91	925.99	3.19	928.71	3.69	928.21	--	--	--	--	--	--
NH-7	935.42	8.64	926.78	9.14	926.28	7.77	927.65	8.13	927.29	--	--	7.22	928.20	7.83	927.59
MW-8	931.89	3.63	928.26	4.74	927.15	2.91	928.98	2.42	929.47	2.33	929.56	1.54	930.35	3.03	928.86
MW-9	931.54	--	--	--	--	3.96	927.58	4.99	926.55	--	--	--	--	--	--
NH-10	935.37	--	--	9.24	926.13	8.23	927.14	8.59	926.78	--	--	7.80	927.57	--	--
NH-25	934.65	6.34	928.31	6.73	927.92	5.83	928.82	5.49	929.16	--	--	4.97	929.68	--	--
MW-24	931.07	--	--	7.58	923.49	4.94	926.13	6.21	924.86	--	--	Destroyed		Destroyed	
NH-26	934.76	6.76	928.00	6.99	927.77	6.24	928.52	NA*	934.76	5.73	929.03	6.04	928.72	6.28	928.48
MW-A	932.83	5.72	927.11	7.33	925.50	5.23	927.60	4.56	928.27	3.92	928.91	5.34	927.49	5.33	927.50
MW-B	932.58	4.58	928.00	6.31	926.27	3.95	928.63	3.57	929.01	2.69	929.89	3.88	928.70	4.32	928.26
MW-C	931.89	4.57	927.32	6.35	925.54	3.26	928.63	3.63	928.26	--	--	4.19	927.70	--	--
MW-D	941.90	--	--	--	--	3.86	938.04	6.59	935.31	--	--	3.58	938.32	--	--
MW-E	933.31	6.44	926.87	7.98	925.33	6.01	927.30	5.60	927.71	4.92	928.39	6.16	927.15	6.09	927.22
MW-F	933.83	7.76	926.07	9.02	924.81	7.21	926.62	7.41	926.42	--	--	7.38	926.45	7.27	926.56
MW-G	934.37	7.68	926.69	9.29	925.08	7.11	927.26	5.89	928.48	--	--	8.25	926.12	--	--
MW-H	933.63	--	--	--	--	7.88	925.75	7.19	926.44	--	--	8.61	925.02	--	--
TEC-1	932.51	4.08	928.43	4.95	927.56	3.54	928.97	4.29	928.22	3.29	929.22	3.34	929.17	3.78	928.73
TEC-1A	932.02	14.18	917.84	15.76	916.26	13.60	918.42	15.17	916.85	--	--	13.90	918.12	--	--
TEC-2	931.90	3.97	927.93	4.86	927.04	3.30	928.60	NA*	931.90	--	--	2.98	928.92	--	--
TEC-3	934.62	6.23	928.39	6.88	927.74	5.90	928.72	5.78	928.84	5.31	929.31	5.74	928.88	5.95	928.67
TEC-4	934.50	6.40	928.10	7.43	927.07	5.76	928.74	5.23	929.27	4.88	929.62	5.79	928.71	5.94	928.56

MSL - Mean Sea Level

NA* Well underwater and could

Table 2
Groundwater Analytical Results - Dissolved Chromium and Lead
Tecumseh Products Co. (Former)-Chromium Line
New Holstein, Wisconsin

WELL ID	Date Sampled	DISSOLVED METALS				UNDISSOLVED METALS	
		Hexavalent Chromium (CrVI)	Total Chromium ¹	Trivalent Chromium ² (CrIII)	Lead	Ferrous Iron	Total Organic Carbon
		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	150	--
	ES	--	100	--	15	300	--
TW-1	8/13/2002	5.0	3.6	NM	--	--	--
TW-2	8/13/2002	24	33	8.7	--	--	--
TW-3	8/13/2002	130	110	NM	--	--	--
TW-4	8/13/2002	7,900	8,200	NM	--	--	--
TW-5	8/13/2002	700	640	NM	--	--	--
TW-6	8/13/2002	5	1 U	NM	--	--	--
TW-7	8/13/2002	6.3	1 U	NM	--	--	--
TW-8	8/13/2002	6.3	1.9	NM	--	--	--
TW-9	8/13/2002	8.9	0.44 U	NM	--	--	--
TW-10	8/13/2002	3.6 U	1.3 U	NM	--	--	--
MW-1	8/13/2002	1,900	1,700	NM	--	--	--
	11/16/2005	4,600	4,900	300	--	--	--
	5/24/2007	2,800	2,800	NM	0.24	--	--
	6/9/2009	680	738	58 J	1.7 J	--	--
	9/24/2009	1,700	1,660	200 U	3.3 J	--	--
	12/28/2009	3.90 U	9.2	9.2 J	2.2 J	--	--
	3/29/2010	5.3	57.6	52.3	2.2 J	--	--
	5/18/2011	50	54.1	4.1	--	--	--
	5/15/2012	4.4 J	16.1	11.7 J	--	--	--
	6/21/2013	33	54.9	NM	2.3 J	--	--
MW-2	8/13/2002	3.6 U	2.3	3.6 U	--	--	--
	11/16/2005	5.0 U	2.8	NM	--	--	--
NH-2	4/24/2012	--	<2.4	--	<1.4	--	--
	8/19/2014	--	2.1 J	--	3 J	--	--
	4/26/2017	<3.9	3.7 J	NM	NM	<28	3,400
MW-3	8/13/2002	1,900	1,700	NM	--	--	--
MW-4	8/13/2002	3.7	0.44 U	NM	--	--	--
	11/15/2005	5.0 U	2.0	NM	--	--	--
	5/24/2007	3.4 U	0.63	NM	0.26	--	--
	6/9/2009	3.9 U	1.3 J	NM	2.2 J	--	--
	9/24/2009	3.9 U	0.39 U	3.9 U	1.3	--	--
	12/28/2009	3.9 U	1.2 J	3.9 U	1.3	--	--
	3/29/2010	3.9 U	0.82 J	3.9 U	1.4 J	--	--
	5/18/2011	3.9 U	1.6 J	3.9 U	--	--	--
	5/15/2012	3.9 U	2.4 U	3.9 U	--	--	--
	6/20/2013	3.4 U	1.2 U	3.9 U	1.2 U	--	--
8/19/2014	--	2.1 U	NM	3 U	--	--	

Notes:

ES = NR140 Enforcement Standard

PAL = NR140 Preventative Action Limit

ITALICIZE = Detection over NR140 PAL Limit

BOLD = Detection over NR140 ES Limit

U = Analyte not detected at or above reporting limit

J = Estimated value. Analyte detected at a level less than the reporting limit and greater than or equal to the detection limit.

"--" = Analyte was not sampled during sampling round

NM Not measured/calculated, due to Cr(VI) result greater than total Cr result.

l = PAL and ES values are for total chromium.

As such, these values are not applicable for hexavalent chromium.

2 = Trivalent chromium is the difference between total chromium and hexavalent chromium concentrations.

Table 2
 Groundwater Analytical Results - Dissolved Chromium and Lead
 Tecumseh Products Co. (Former)-Chromium Line
 New Holstein, Wisconsin

WELL ID	DATE SAMPLED	DISSOLVED METALS				UNDISSOLVED METALS	
		HEXAVALENT CHROMIUM (CrVI)	TOTAL CHROMIUM ¹	TRIVALENT CHROMIUM ² (CrIII)	Lead	Ferrous Iron	Total Organic Carbon
UNITS		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	--	-
	ES	--	100	--	15	--	-
MW-5	8/13/2002	380	390	180 U	NM	--	--
	11/16/2005	330	270	NM	NM	--	--
	5/24/2007	1,100	910	NM	0.19	--	--
	6/9/2009	950	938	9.8 U	3.2 J	--	--
	9/24/2009	3400	3,510	110	2.6 J	--	--
	12/29/2009	240	240	3.9 U	1.5 J	--	--
	3/30/2010	210	202	3.9 U	2 J	--	--
	5/19/2011	140	134	NM	NM	--	--
	5/15/2012	350	339	NM	NM	--	--
	6/20/2013	290	313	NM	1.2 U	--	--
	8/18/2014	NM	318	--	3 U	--	--
	3/21/2019	--	<i>81.6</i>	--	--	--	--
11/5/2020	--	102	--	--	--	--	
MW-6	8/13/2002	8.9	0.56 U	NM	NM	--	--
	11/15/2005	45	65	20	NM	--	--
	5/24/2007	3.4 U	2.6	NM	0.07	--	--
	6/9/2009	3.9 U	0.39 U	3.9	2.6 J	--	--
	9/24/2009	3.9 U	5.0	5.0	2 J	--	--
	12/28/2009	3.9 U	0.48 J	3.9	1.3 U	--	--
	3/29/2010	3.9 U	0.39 U	3.9	2.3 J	--	--
	5/18/2011	3.9 U	1.2 J	3.9	NM	--	--
	5/15/2012	3.9 U	2.4 U	3.9	NM	--	--
	6/20/2013	3.4 U	1.2 U	NM	1.2 U	--	--
	8/19/2014	NM	2.1 U	NM	3 U	--	--
	NH-7	4/24/2012	NM	261	NM	1.7 J	--
6/20/2013		110	111	NM	1.2 U	--	--
8/19/2014		NM	114	NM	3 U	--	--
3/21/2019		--	279	--	--	--	--
11/5/2020		--	311	--	--	--	--
MW-8	8/13/2002	3,100	3,200	720 U	NM	--	--
	11/16/2005	3,000	2,900	NM	NM	--	--
	5/24/2007	1,900	1,600	NM	0.09	--	--
	6/9/2009	7,300	8,730	1400	2.9 J	--	--
	9/24/2009	8,200	8,470	270	2.6 J	--	--
	12/29/2009	5100	5,150	50 J	1.9 J	--	--
	3/29/2010	1,900	1,720	180	2.3 J	--	--
	5/19/2011	320	330	10	NM	--	--
	5/15/2012	3,100	2,940	NM	NM	--	--
	6/20/2013	860	844	NM	1.8 J	--	--
	8/18/2014	NM	1,320	NM	3 U	--	--
	4/22/2016	NM	46.7	NM	NM	--	--
	9/7/2016	NM	725	NM	NM	--	--
4/26/2017	<3.9	<2.5	NM	NM	<28	4,500	
3/21/2019	--	5.2 J	--	--	--	--	
11/5/2020	--	5.0 J	--	--	--	--	

Notes:

ES = NR140 Enforcement Standard

PAL = NR140 Preventative Action Limit

ITALICIZE = Detection over NR140 PAL Limit

BOLD = Detection over NR140 ES Limit

U = Analyte not detected at or above reporting limit

J = Estimated value. Analyte detected at a level less than the reporting limit and greater than or equal to the detection limit.

"--" = Analyte was not sampled during sampling round

NM Not measured/calculated, due to Cr(VI) result greater than total Cr result.

1 = PAL and ES values are for total chromium.

As such, these values are not applicable for hexavalent chromium.

2 = Trivalent chromium is the difference between total chromium and hexavalent chromium concentrations.

Table 2
 Groundwater Analytical Results - Dissolved Chromium and Lead
 Tecumseh Products Co. (Former)-Chromium Line
 New Holstein, Wisconsin

WELL ID	DATE SAMPLED	DISSOLVED METALS				UNDISSOLVED METALS	
		HEXAVALENT CHROMIUM (CrVI)	TOTAL CHROMIUM ¹	TRIVALENT CHROMIUM ² (CrIII)	Lead	Ferrous Iron	Total Organic Carbon
UNITS		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	--	--
	ES	--	100	--	15	--	--
MW-9	8/13/2002	3.6 U	0.44 U	3.6	NM	--	--
	11/15/2005	5.0 U	1.7	NM	1.8	--	--
	5/24/2007	5.4	0.44	NM	0.06	--	--
	6/9/2009	3.9 U	0.39 U	3.9 U	2.2 J	--	--
	9/24/2009	3.9 U	0.39 U	3.9 U	2.1 J	--	--
	12/28/2009	3.9 U	0.39 U	3.9 U	1.7 J	--	--
	3/29/2010	3.9 U	4.9 J	4.9 J	2.4 J	--	--
NH-10	4/23/2012	NM	4.1 J	NM	1.9 J	--	--
	8/19/2014	NM	2.1 U	NM	3 U	--	--
MW-24	8/19/2014	NM	3.7 J	NM	3 U	--	--
NH-25	4/23/2012	NM	1,220	NM	1.6 J	--	--
	6/20/2013	3,100	3,330	NM	2.8 J	--	--
	8/19/2014	NM	895	--	3 U	--	--
NH-26	4/23/2012	--	470	--	<1.4	--	--
	6/20/2013	480	510	NM	1.2 U	--	--
	8/19/2014	--	284	--	3 U	--	--
	4/26/2017	1,500	1,400	NM	NM	<28	7,400
	3/21/2019	--	763	--	--	--	--
	11/5/2020	--	1,080	--	--	--	--
MW-A	5/24/2007	4,000	4,100	100	27.0	--	--
	6/8/2009	1,500	1,510	20 U	2.1 J	--	--
	9/24/2009	3,600	3,710	110	1.5 J	--	--
	12/28/2009	1,900	1,870	20 U	2.1 J	--	--
	3/29/2010	1,500	1,390	110	2.3 J	--	--
	5/18/2011	590	594	4	--	--	--
	5/15/2012	440	417	NM	--	--	--
	6/21/2013	520	484	NM	2.3 J	--	--
	8/19/2014	--	18.1	--	3	--	--
	4/22/2016	--	307	--	--	--	--
	9/7/2016	NM	60.1	NM	NM	--	--
	4/26/2017	330	295	NM	NM	<28	5,800
	3/21/2019	--	458	--	--	--	--
11/5/2020	--	779	--	--	--	--	
MW-B	5/24/2007	910	780	NM	0.044 U	--	--
	6/9/2009	570	533	20 U	2.2 J	--	--
	9/24/2009	1,300	1,200	100 U	1.6 J	--	--
	12/28/2009	740	649	20 U	2.4 J	--	--
	3/29/2010	270	263	20 U	2.2 J	--	--
	5/18/2011	68	64	NM	--	--	--
	5/15/2012	5.5 J	10.2	4.7 J	--	--	--
	6/20/2013	74	73.8	NM	1.2 U	--	--
	8/19/2014	--	47.1	--	3 U	--	--
	4/22/2016	NM	20.1	NM	NM	--	--
	9/7/2016	NM	585	NM	NM	--	--
	4/26/2017	<3.9	4.7 J	NM	NM	<28	910
	3/21/2019	--	79.6	--	--	--	--
11/5/2020	--	73.3	--	--	--	--	

Notes:

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NM Not measured/calculated, due to Cr(VI) result greater than total Cr result.

1 = PAL and ES values are for total chromium.

As such, these values are not applicable for hexavalent chromium.

2 = Trivalent chromium is the difference between total chromium and hexavalent chromium concentrations.

Table 2
 Groundwater Analytical Results - Dissolved Chromium and Lead
 Tecumseh Products Co. (Former)-Chromium Line
 New Holstein, Wisconsin

WELL ID	DATE SAMPLED	DISSOLVED METALS				UNDISSOLVED METALS	
		HEXAVALENT CHROMIUM (CrVI)	TOTAL CHROMIUM ¹	TRIVALENT CHROMIUM ² (CrIII)	Lead	Ferrous Iron	Total Organic Carbon
UNITS		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	--	--
	ES	--	100	--	15	--	--
MW-C	5/24/2007	3.4 U	1.3	NM	0.07	--	--
	6/9/2009	3.9 U	1.1 J	3.9 U	2.4 J	--	--
	9/24/2009	3.9 U	0.39 U	3.9 U	4.1 J	--	--
	12/28/2009	3.9 U	4.5 J	4.5 J	1.9 J	--	--
	3/29/2010	3.9 U	4.2 J	4.2 J	1.4 J	--	--
	5/18/2011	3.9 U	2.3 J	3.9 U	--	--	--
	5/15/2012	3.9 U	2.4 U	3.9 U	--	--	--
	6/20/2013	3.4 U	1.2 U	NM	1.2 U	--	--
8/19/2014	--	2.1 U	--	3 U	--	--	
MW-D	5/25/2007	3.4 U	1.9	NM	0.1	--	--
	6/9/2009	3.9 U	2.4 J	3.9 U	1.7 J	--	--
	9/24/2009	3.9 U	0.42 J	3.9 U	3 J	--	--
	12/29/2009	3.9 U	1.9 J	3.9 U	2.5 J	--	--
	3/29/2010	3.9 U	1.0 J	3.9 U	1.4 J	--	--
MW-E	6/9/2009	290	268	3.9 U	2 J	--	--
	9/24/2009	340	353	20 U	2 J	--	--
	12/29/2009	870	814	39 U	3.9 J	--	--
	3/30/2010	890	808	39 U	1.9 J	--	--
	5/19/2011	1,000	963	NM	--	--	--
	5/15/2012	1,000	920	NM	--	--	--
	6/20/2013	1,200	1,150	NM	2.9 J	--	--
	8/19/2014	--	1,290	--	3 U	--	--
	4/22/2016	NM	594	NM	NM	--	--
	9/7/2016	NM	507	NM	NM	--	--
4/26/2017	550	533	NM	NM	<28	6,200	
3/21/2019	--	628	--	--	--	--	
11/5/2020	--	1,420	--	--	--	--	
MW-F	6/8/2009	3.9 U	0.46 J	3.9 U	2.2 J	--	--
	9/23/2009	3.9 U	0.39 U	3.9 U	2.4 J	--	--
	12/28/2009	3.9 U	1.8 J	3.9 U	1.6 J	--	--
	3/29/2010	3.9 U	1.4 J	3.9 U	2.2 J	--	--
	5/18/2011	3.9 U	1.7 J	3.9 U	--	--	--
	5/15/2012	3.9 U	2.4 U	3.9 U	--	--	--
	6/21/2013	3.9 U	1.2 U	NM	1.2 U	--	--
	8/19/2014	3.9 U	2.1 U	--	3 U	--	--
	3/21/2019	--	2.5 U	--	--	--	--
	11/5/2020	--	2.5 U	--	--	--	--
MW-G	6/8/2009	3.9 U	0.7 J	3.9 U	1.3	--	--
	9/23/2009	3.9 U	0.39 U	3.9 U	4.9 J	--	--
	12/28/2009	3.9 U	0.39 J	3.9 U	1.9 J	--	--
	3/29/2010	3.9 U	0.39 U	3.9 U	3 J	--	--
	5/18/2011	3.9 U	1.1 J	3.9 U	--	--	--
	5/15/2012	3.9 U	2.4 U	3.9 U	--	--	--
	6/21/2013	3.4 U	1.2 U	NM	3.1 J	--	--
	8/19/2014	--	2.1 U	--	3 U	--	--

Notes:

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ITALICIZE = Detection over NR140 PAL Limit

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U = Analyte not detected at or above reporting limit

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NM = Not measured/calculated, due to Cr(VI) result greater than total Cr result.

I = PAL and ES values are for total chromium.

As such, these values are not applicable for hexavalent chromium.

2 = Trivalent chromium is the difference between total chromium and hexavalent chromium concentrations.

Table 2
Groundwater Analytical Results - Dissolved Chromium and Lead
Tecumseh Products Co. (Former)-Chromium Line
New Holstein, Wisconsin

WELL ID	DATE SAMPLED	DISSOLVED METALS				UNDISSOLVED METALS	
		HEXAVALENT CHROMIUM (CrVI)	TOTAL CHROMIUM ¹	TRIVALENT CHROMIUM ² (CrIII)	Lead	Ferrous Iron	Total Organic Carbon
UNITS		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	--	-
	ES	--	100	--	15	--	-
MW-H	6/8/2009	3.9 U	0.89 J	3.9 U	1.3	--	--
	9/23/2009	3.9 U	3.9 U	3.9 U	2.1 J	--	--
	12/28/2009	3.9 U	3.9 U	3.9 U	2.7 J	--	--
	3/29/2010	3.9 U	3.9 U	3.9 U	1.6 J	--	--
TEC-1	8/13/2002	500	490	NM	--	--	--
	11/16/2005	4,300	3,800	NM	1.9	--	--
	5/23/2007	790	670	NM	20	--	--
	6/10/2009	11,400	12,000	600 J	3.5 J	--	--
	9/24/2009	3,000	3,120	120	3.8 J	--	--
	12/29/2009	7,900	7,430	200 U	3.3 J	--	--
	3/30/2010	6,700	6,710	200 U	3.3 J	--	--
	5/19/2011	2,400	2,620	220	--	--	--
	5/15/2012	2,300	2,190	NM	--	--	--
	6/20/2013	2,300	2,250	NM	4.3 J	--	--
	8/18/2014	--	1,250	--	3 U	--	--
	4/26/2017	650	598	NM	NM	<28	2,100
	3/21/2019	--	315	--	--	--	--
11/5/2020	--	318	--	--	--	--	
TEC-1A	8/13/2002	14	0.52 U	NM	--	--	--
	3/6/2006	5.0 U	2.8	NM	--	--	--
	5/23/2007	3.4 U	0.43 U	NM	0.07	--	--
	6/9/2009	14 J	22.6	9 J	2.2 J	--	--
	9/24/2009	3.9 U	1.1 J	3.9 U	2.1 J	--	--
	12/29/2009	3.9 U	4.3 J	4.3 J	2 J	--	--
	3/29/2010	3.9 U	5.1	5.1	1.5 J	--	--
	5/19/2011	32	38.7	6.7	--	--	--
	5/15/2012	3.9 U	8.2	8.2	--	--	--
	6/20/2013	3.4 U	1.2 U	NM	1.2 U	--	--
	8/18/2014	--	2.1 U	--	3 U	--	--
TEC-2	8/13/2002	16	0.44 U	NM	--	--	--
	11/16/2005	5.0 U	0.78	NM	--	--	--
	5/24/2007	3.4 U	0.94	--	0.13	--	--
	6/9/2009	3.9 U	1.2 J	3.9 U	2.5 J	--	--
	9/24/2009	3.9 U	0.68 J	3.9 U	3.1 J	--	--
	12/29/2009	3.9 U	1.1 J	3.9 U	3.2 J	--	--
	3/30/2010	3.9 U	2.7 J	3.9 U	2.3 J	--	--
	5/19/2011	3.9 U	1.3 J	3.9 U	--	--	--
	5/15/2012	3.9 U	2.4 U	3.9 U	--	--	--
	6/20/2013	3.4 U	1.2 U	NM	2.8 J	--	--
	8/18/2014	--	2.1 U	--	3.0 U	--	--

Notes:

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Table 2
 Groundwater Analytical Results - Dissolved Chromium and Lead
 Tecumseh Products Co. (Former)-Chromium Line
 New Holstein, Wisconsin

WELL ID	DATE SAMPLED	DISSOLVED METALS				UNDISSOLVED METALS	
		HEXAVALENT	TOTAL	TRIVALENT	Lead	Ferrous Iron	Total Organic
UNITS		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	--	-
	ES	--	100	--	15	--	-
TEC-3	9/23/2003	270	310	40	--	--	--
	11/16/2005	540	490	NM	--	--	--
	5/24/2007	1,000	910	NM	0.17	--	--
	6/10/2009	400	789	390	3.5 J	--	--
	9/24/2009	99	99	20 U	1.8 J	--	--
	12/29/2009	190	201	11 J	2.2 J	--	--
	3/30/2010	470	445	20 U	1.3 J	--	--
	5/19/2011	580	585	5	--	--	--
	5/15/2012	250	227	NM	--	--	--
	6/20/2013	1,200	1,260	NM	1.2 U	--	--
	8/19/2014	--	2,100	--	3 U	--	--
	4/22/2016	NM	5,650	NM	NM	--	--
	9/7/2016	NM	2,820	NM	NM	--	--
	4/26/2017	5,300	5,040	NM	NM	<28	5,800
	3/21/2019	--	1,080	--	--	--	--
11/5/2020	--	4,560	--	--	--	--	
TEC-4	9/23/2003	1,200	1,300	100	--	--	--
	11/16/2005	2,800	2,700	NM	0.40 U	--	--
	5/24/2007	4,800	4,000	NM	0.06	--	--
	6/10/2009	13,300	12,500	200 U	2.3 J	--	--
	9/24/2009	5,500	5,220	500 U	2.3 J	--	--
	12/29/2009	5,200	5,360	160 J	3 J	--	--
	3/30/2010	14,300	12,900	390 U	2.5 J	--	--
	5/19/2011	29,000	29,200	200	--	--	--
	5/15/2012	21,300	20,300	NM	--	--	--
	6/20/2013	33,600	32,200	NM	14 U	--	--
	8/19/2014	--	6,880	--	3 U	--	--
	4/22/2016	NM	65,100	NM	NM	--	--
	9/7/2016	NM	33,100	NM	NM	--	--
	4/26/2017	16,200	15,400	NM	NM	<28	13,400
	3/21/2019	--	16,900	--	--	--	--
11/5/2020	--	26,100	--	--	--	--	

Notes:

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PAL = NR140 Preventative Action Limit

<i>ITALICIZE</i>	= Detection over NR140 PAL Limit
------------------	----------------------------------

BOLD	= Detection over NR140 ES Limit
-------------	---------------------------------

U = Analyte not detected at or above reporting limit

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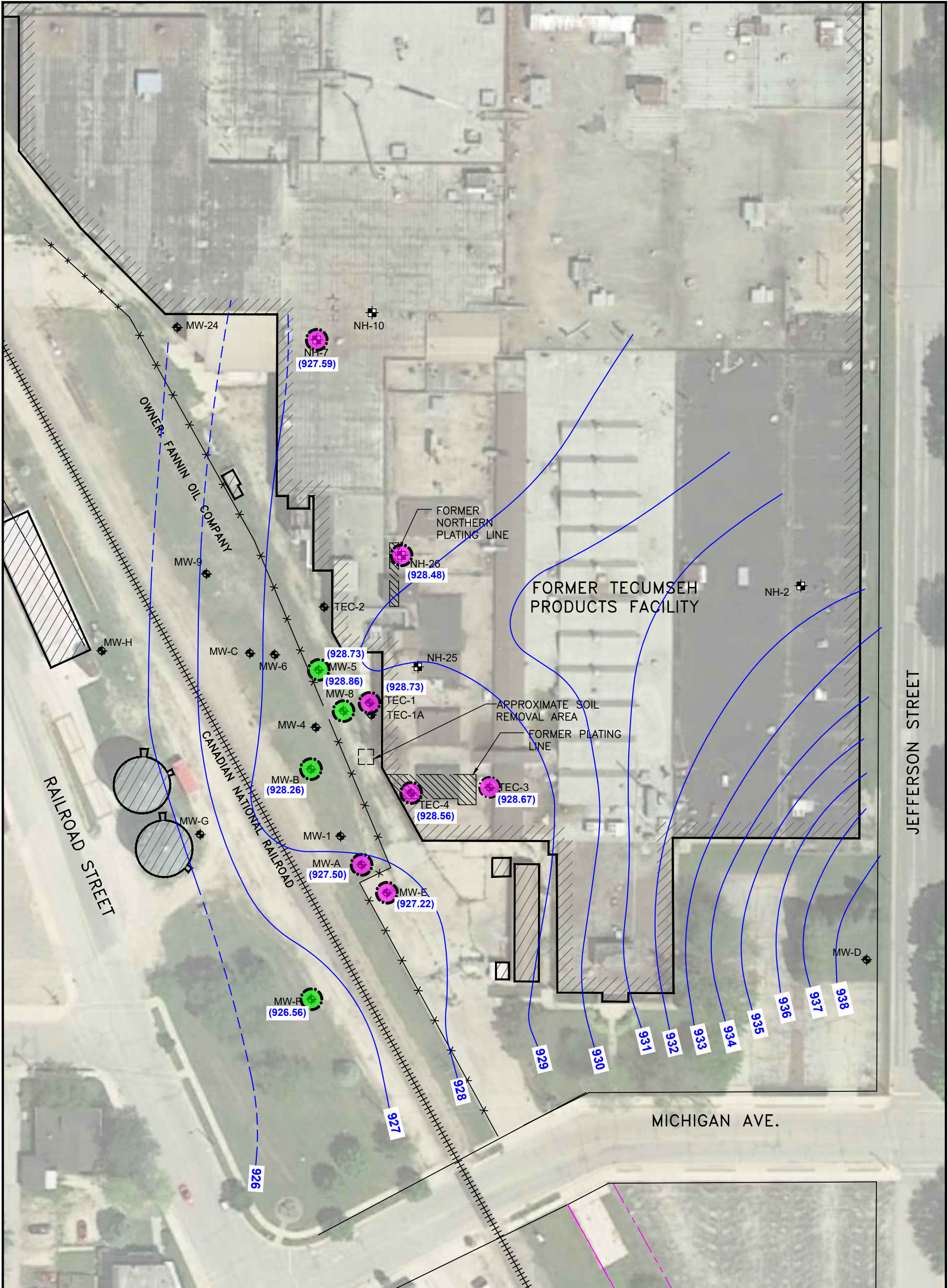
NM Not measured/calculated, due to Cr(VI) result greater than total Cr result.

l = PAL and ES values are for total chromium.

As such, these values are not applicable for hexavalent chromium.

2 = Trivalent chromium is the difference between total chromium and hexavalent chromium concentrations.

FIGURES

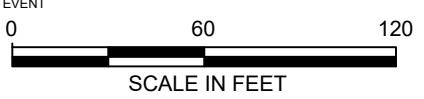


LEGEND:

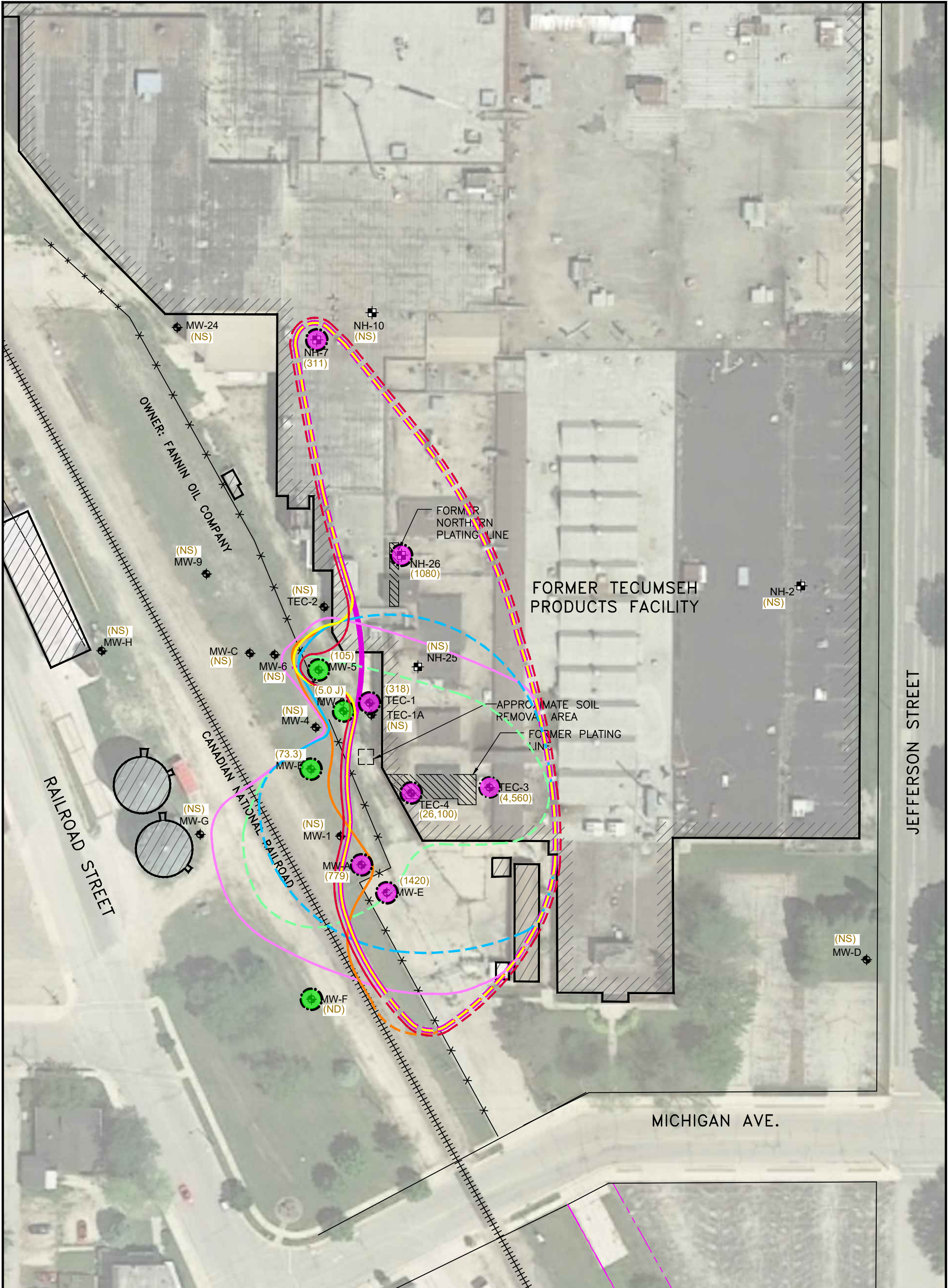
- MONITORING WELL LOCATION
- MONITORING WELL INSTALLED BY ROBERT E. LEE & ASSOCIATES IN 2012
- RAILROAD TRACKS
- FENCE
- GROUNDWATER ELEVATION - NOVEMBER 13, 2020
- GROUNDWATER ELEVATION CONTOUR
- GROUNDWATER ELEVATION CONTOUR - ESTIMATED

- TOTAL CHROMIUM BELOW ENFORCEMENT STANDARD
- TOTAL CHROMIUM ABOVE ENFORCEMENT STANDARD
- WELLS SAMPLED IN 2019.

NOTE: MW-24 WAS FOUND TO BE DESTROYED DURING THE NOVEMBER 13, 2020 GROUNDWATER EVENT



PROJECT: BRRTS #02-08-36333		
TITLE: TECUMSEH PRODUCTS CO. (FORMER) - CHROMIUM LINE NEW HOLSTEIN, WISCONSIN		
DATE: DECEMBER 2020		
DRAWN BY: S.ALBERTS	SCALE: AS SHOWN	PROJ. NO. 107927
CHECKED BY: T.GOMOLL	DATE PRINTED:	FILE NO. 107927-17(CR LINE).dwg
APPROVED BY: C.HARVEY	FIGURE 1	



LEGEND:

- ◆ MONITORING WELL LOCATION
- ◆ MONITORING WELL INSTALLED BY ROBERT E. LEE & ASSOCIATES IN 2012
- ||||| RAILROAD TRACKS
- FENCE
- (65) TOTAL DISSOLVED CHROMIUM (ug/L) - NOVEMBER 13, 2020
- (NS) NOT SAMPLED
- (ND) CHROMIUM NOT DETECTED
- TOTAL CHROMIUM BELOW ENFORCEMENT STANDARD
- TOTAL CHROMIUM ABOVE ENFORCEMENT STANDARD

ENFORCEMENT STANDARD POINT-OF-COMPLIANCE FOR TOTAL DISSOLVED CHROMIUM (100 ug/L) BY YEAR DASHED WHERE INFERRED

- 2020
- 2019
- 2017
- 2014
- 2009
- 2005
- 2003/2002


NOTES:

- SAMPLES COLLECTED NOVEMBER 13, 2020.
- TEC-1A IS A DEEP WELL.

PROJECT: **BRRTS #02-08-36333**
TECUMSEH PRODUCTS CO. (FORMER) - CHROMIUM LINE
NEW HOLSTEIN, WISCONSIN

TITLE: **TOTAL DISSOLVED CHROMIUM**
ISOCONCENTRATION MAP BY YEAR

DRAWN BY: S.ALBERTS	SCALE: AS SHOWN	PROJ. NO. 107927
CHECKED BY: T.GOMOLL	DATE PRINTED:	FILE NO. 107927-18(CR LINE).dwg
APPROVED BY: C.HARVEY	FIGURE 2	
DATE: DECEMBER 2020		


 230 West Monroe St.
 Suite 630
 Chicago, IL 60606
 Phone: 312.578.0870

ATTACHMENT A

ATTACHMENT B

December 07, 2020

Chris Harvey
TRC Environmental
230 W. Monroe St
Suite 630
Chicago, IL 60606

RE: Project: TECUMSEH-HARP
Pace Project No.: 40217966

Dear Chris Harvey:

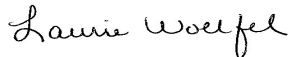
Enclosed are the analytical results for sample(s) received by the laboratory on November 07, 2020. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Green Bay

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Laurie Woelfel
laurie.woelfel@pacelabs.com
(920)469-2436
Project Manager

Enclosures

cc: Tyler Gomoll, TRC Solutions
Tanner Hess, TRC



REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, LLC.

CERTIFICATIONS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Pace Analytical Services Green Bay

1241 Bellevue Street, Green Bay, WI 54302

Florida/NELAP Certification #: E87948

Illinois Certification #: 200050

Kentucky UST Certification #: 82

Louisiana Certification #: 04168

Minnesota Certification #: 055-999-334

New York Certification #: 12064

North Dakota Certification #: R-150

Virginia VELAP ID: 460263

South Carolina Certification #: 83006001

Texas Certification #: T104704529-14-1

Wisconsin Certification #: 405132750

Wisconsin DATCP Certification #: 105-444

USDA Soil Permit #: P330-16-00157

Federal Fish & Wildlife Permit #: LE51774A-0

REPORT OF LABORATORY ANALYSIS

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without the written consent of Pace Analytical Services, LLC.

SAMPLE SUMMARY

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40217966001	TEC-3	Water	11/05/20 10:15	11/07/20 10:45
40217966002	TEC-4	Water	11/05/20 10:45	11/07/20 10:45
40217966003	NH-26	Water	11/05/20 11:20	11/07/20 10:45
40217966004	NH-7	Water	11/05/20 12:05	11/07/20 10:45
40217966005	MW-E	Water	11/05/20 13:30	11/07/20 10:45
40217966006	TEC-1	Water	11/05/20 14:10	11/07/20 10:45
40217966007	DUP-1	Water	11/05/20 00:00	11/07/20 10:45
40217966008	MW-8	Water	11/05/20 14:40	11/07/20 10:45
40217966009	MW-5	Water	11/05/20 15:15	11/07/20 10:45
40217966010	MW-A	Water	11/05/20 16:05	11/07/20 10:45
40217966011	MW-B	Water	11/05/20 16:30	11/07/20 10:45
40217966012	MW-F	Water	11/05/20 17:10	11/07/20 10:45

REPORT OF LABORATORY ANALYSIS

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SAMPLE ANALYTE COUNT

Project: TECUMSEH-HARP
Pace Project No.: 40217966

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
40217966001	TEC-3	EPA 6010	TXW	1	PASI-G
40217966002	TEC-4	EPA 6010	TXW	1	PASI-G
40217966003	NH-26	EPA 6010	TXW	1	PASI-G
40217966004	NH-7	EPA 6010	TXW	1	PASI-G
40217966005	MW-E	EPA 6010	TXW	1	PASI-G
40217966006	TEC-1	EPA 6010	TXW	1	PASI-G
40217966007	DUP-1	EPA 6010	TXW	1	PASI-G
40217966008	MW-8	EPA 6010	TXW	1	PASI-G
40217966009	MW-5	EPA 6010	TXW	1	PASI-G
40217966010	MW-A	EPA 6010	TXW	1	PASI-G
40217966011	MW-B	EPA 6010	TXW	1	PASI-G
40217966012	MW-F	EPA 6010	TXW	1	PASI-G

PASI-G = Pace Analytical Services - Green Bay

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: TEC-3 **Lab ID: 40217966001** Collected: 11/05/20 10:15 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved	Analytical Method: EPA 6010 Pace Analytical Services - Green Bay								
Chromium, Dissolved	4560	ug/L	10.0	2.5	1		11/09/20 20:27	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: TEC-4 **Lab ID: 40217966002** Collected: 11/05/20 10:45 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved	Analytical Method: EPA 6010 Pace Analytical Services - Green Bay								
Chromium, Dissolved	26100	ug/L	10.0	2.5	1		11/09/20 20:37	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: NH-26 **Lab ID: 40217966003** Collected: 11/05/20 11:20 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Pace Analytical Services - Green Bay									
Chromium, Dissolved	1080	ug/L	10.0	2.5	1		11/09/20 20:39	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: NH-7 **Lab ID: 40217966004** Collected: 11/05/20 12:05 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved	Analytical Method: EPA 6010 Pace Analytical Services - Green Bay								
Chromium, Dissolved	311	ug/L	10.0	2.5	1		11/09/20 20:42	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: MW-E **Lab ID: 40217966005** Collected: 11/05/20 13:30 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved	Analytical Method: EPA 6010 Pace Analytical Services - Green Bay								
Chromium, Dissolved	1420	ug/L	10.0	2.5	1		11/09/20 20:17	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: TEC-1 **Lab ID: 40217966006** Collected: 11/05/20 14:10 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Pace Analytical Services - Green Bay									
Chromium, Dissolved	318	ug/L	10.0	2.5	1		11/09/20 20:44	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: DUP-1 **Lab ID: 40217966007** Collected: 11/05/20 00:00 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010 Pace Analytical Services - Green Bay									
Chromium, Dissolved	319	ug/L	10.0	2.5	1		11/09/20 20:47	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: MW-8 **Lab ID: 40217966008** Collected: 11/05/20 14:40 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010 Pace Analytical Services - Green Bay									
Chromium, Dissolved	5.0J	ug/L	10.0	2.5	1		11/09/20 20:49	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: MW-5 **Lab ID: 40217966009** Collected: 11/05/20 15:15 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Pace Analytical Services - Green Bay									
Chromium, Dissolved	102	ug/L	10.0	2.5	1		11/09/20 20:51	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: MW-A **Lab ID: 40217966010** Collected: 11/05/20 16:05 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved	Analytical Method: EPA 6010 Pace Analytical Services - Green Bay								
Chromium, Dissolved	779	ug/L	10.0	2.5	1		11/09/20 20:54	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: MW-B **Lab ID: 40217966011** Collected: 11/05/20 16:30 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved	Analytical Method: EPA 6010 Pace Analytical Services - Green Bay								
Chromium, Dissolved	73.3	ug/L	10.0	2.5	1		11/09/20 20:56	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

Sample: MW-F **Lab ID: 40217966012** Collected: 11/05/20 17:10 Received: 11/07/20 10:45 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved	Analytical Method: EPA 6010 Pace Analytical Services - Green Bay								
Chromium, Dissolved	<2.5	ug/L	10.0	2.5	1		11/09/20 21:04	7440-47-3	

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QUALITY CONTROL DATA

Project: TECUMSEH-HARP
Pace Project No.: 40217966

QC Batch:	370698	Analysis Method:	EPA 6010
QC Batch Method:	EPA 6010	Analysis Description:	ICP Metals, Trace, Dissolved
		Laboratory:	Pace Analytical Services - Green Bay

Associated Lab Samples: 40217966001, 40217966002, 40217966003, 40217966004, 40217966005, 40217966006, 40217966007, 40217966008, 40217966009, 40217966010, 40217966011, 40217966012

METHOD BLANK: 2143712 Matrix: Water
Associated Lab Samples: 40217966001, 40217966002, 40217966003, 40217966004, 40217966005, 40217966006, 40217966007, 40217966008, 40217966009, 40217966010, 40217966011, 40217966012

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chromium, Dissolved	ug/L	<2.5	10.0	11/09/20 20:13	

LABORATORY CONTROL SAMPLE: 2143713

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chromium, Dissolved	ug/L	500	496	99	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2143715 2143716

Parameter	Units	40217966005 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chromium, Dissolved	ug/L	1420	500	500	1910	1900	98	95	75-125	1	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

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QUALIFIERS

Project: TECUMSEH-HARP

Pace Project No.: 40217966

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above LOD.

J - Estimated concentration at or above the LOD and below the LOQ.

LOD - Limit of Detection adjusted for dilution factor, percent moisture, initial weight and final volume.

LOQ - Limit of Quantitation adjusted for dilution factor, percent moisture, initial weight and final volume.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected at or above the adjusted LOD.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA CROSS REFERENCE TABLE


Project: TECUMSEH-HARP

Pace Project No.: 40217966

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40217966001	TEC-3	EPA 6010	370698		
40217966002	TEC-4	EPA 6010	370698		
40217966003	NH-26	EPA 6010	370698		
40217966004	NH-7	EPA 6010	370698		
40217966005	MW-E	EPA 6010	370698		
40217966006	TEC-1	EPA 6010	370698		
40217966007	DUP-1	EPA 6010	370698		
40217966008	MW-8	EPA 6010	370698		
40217966009	MW-5	EPA 6010	370698		
40217966010	MW-A	EPA 6010	370698		
40217966011	MW-B	EPA 6010	370698		
40217966012	MW-F	EPA 6010	370698		

REPORT OF LABORATORY ANALYSIS

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 1241 Bellevue Street, Green Bay, WI 54302	Document Name: Sample Condition Upon Receipt (SCUR)	Document Revised: 26Mar2020
	Document No.: ENV-FRM-GBAY-0014-Rev.00	Author: Pace Green Bay Quality Office

Sample Condition Upon Receipt Form (SCUR)

Client Name: TRC
Project #: _____

Courier: CS Logistics Fed Ex Speedee UPS Waltco
 Client Pace Other: _____

Tracking #: 8152 5165 2417

Custody Seal on Cooler/Box Present: yes no
 Seals intact: yes no
Custody Seal on Samples Present: yes no
 Seals intact: yes no

Packing Material: Bubble Wrap Bubble Bags None Other

Thermometer Used SR - N/A
 Type of Ice: Wet Blue Dry None Samples on ice, cooling process has begun

Cooler Temperature
 Uncorr: N/A ICorr: _____

Temp Blank Present: yes no
 Biological Tissue is Frozen: yes no


Temp should be above freezing to 6°C.
 Biota Samples may be received at ≤ 0°C if shipped on Dry Ice.

Person examining contents:

Date: 11/7/20 / Initials: SRK

Labeled By Initials: NO

WO#: 40217966



40217966

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.
Chain of Custody Filled Out:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	2. <u>Proj. #, mail/invoice info.</u> <u>11/7/20</u> <u>SRK</u>
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	5.
- VOA Samples frozen upon receipt	<input type="checkbox"/> Yes <input type="checkbox"/> No	Date/Time: _____
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6.
Rush Turn Around Time Requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	7.
Sufficient Volume:		8.
For Analysis: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No MS/MSD: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Correct Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	9.
-Pace Containers Used:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
-Pace IR Containers Used:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	10.
Filtered volume received for Dissolved tests	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	11.
Sample Labels match COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	12.
-Includes date/time/ID/Analysis Matrix: <u>W</u>		
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	13.
Trip Blank Custody Seals Present	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Pace Trip Blank Lot # (if purchased):		

Client Notification/ Resolution: If checked, see attached form for additional comments

Person Contacted: _____ Date/Time: _____

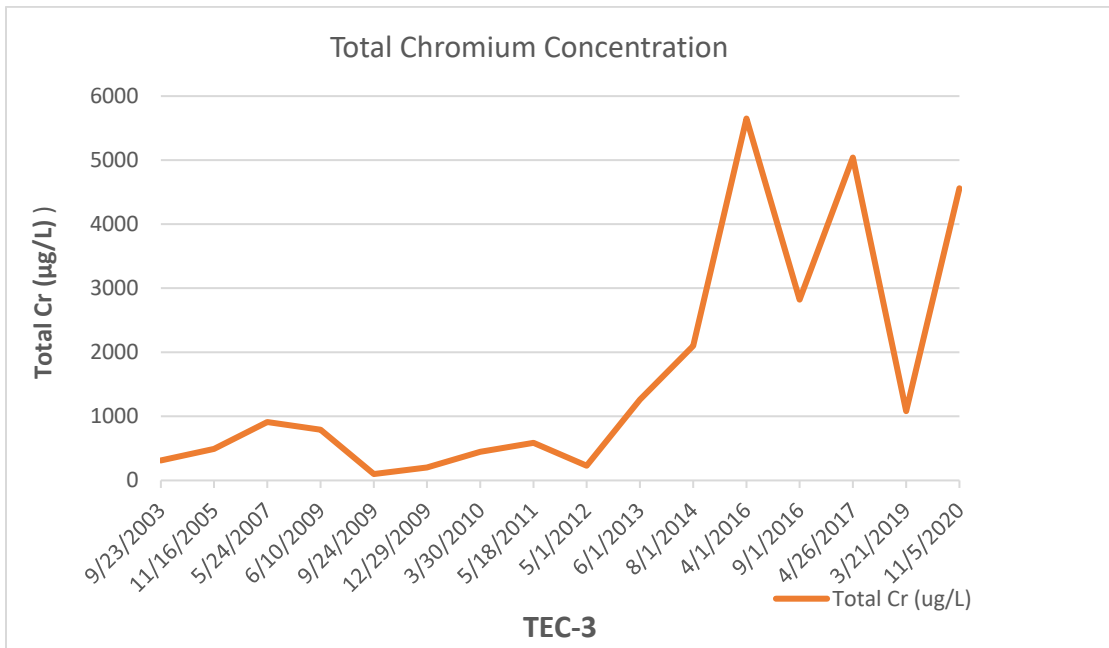
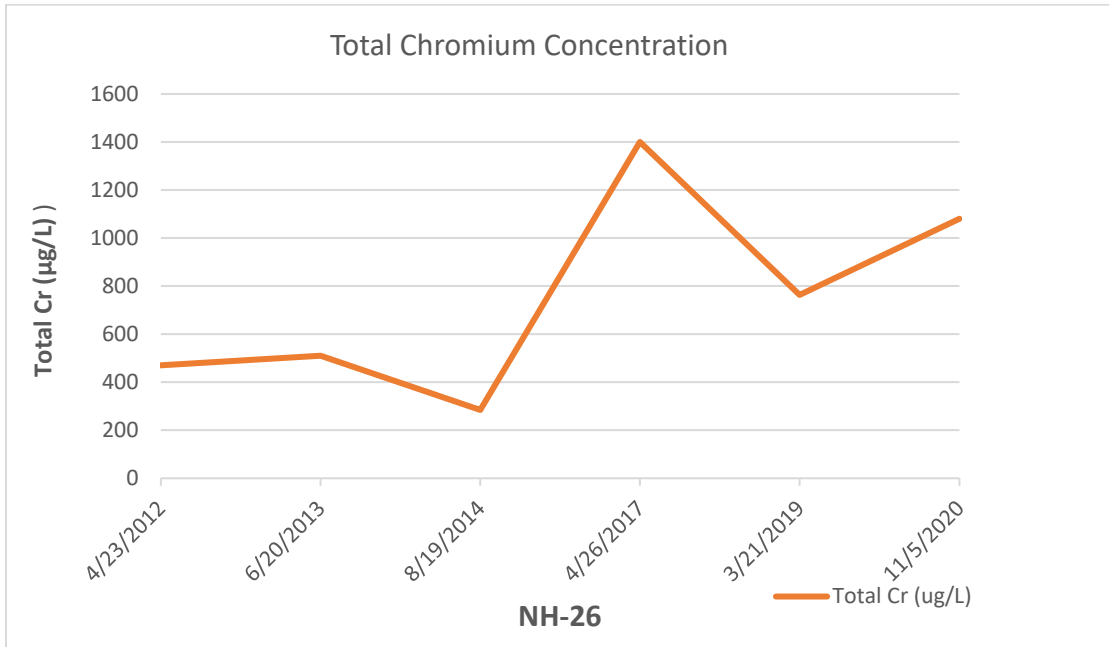
Comments/ Resolution: _____

PM Review is documented electronically in LIMs. By releasing the project, the PM acknowledges they have reviewed the sample logir

ATTACHMENT C

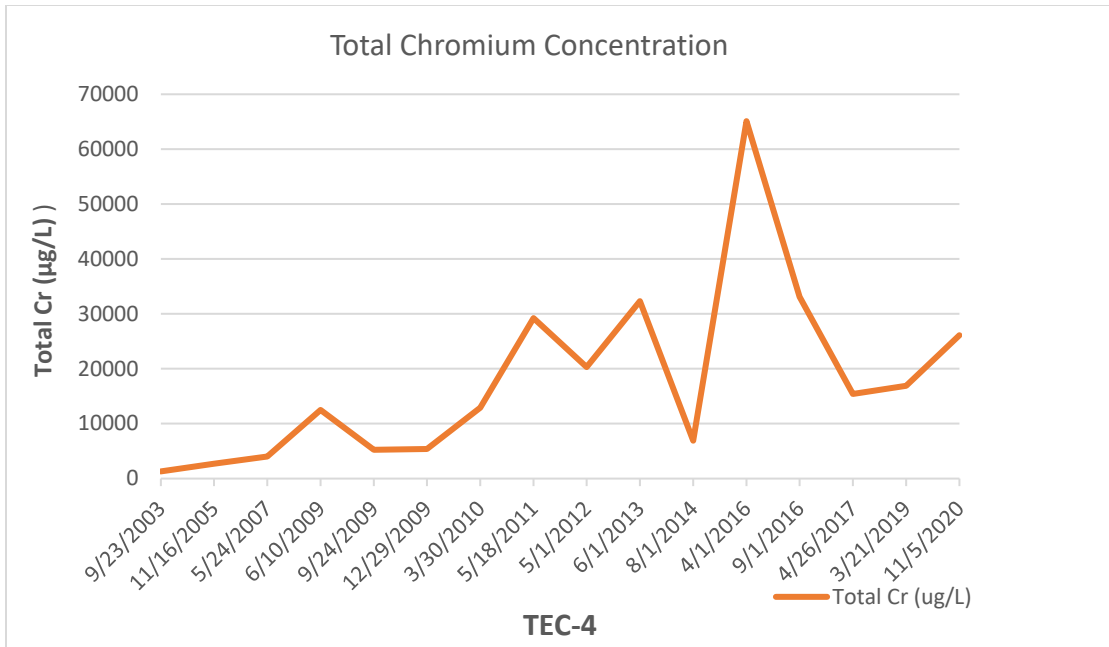
Attachment C – Trend Analysis Charts

Source Area Monitoring Wells

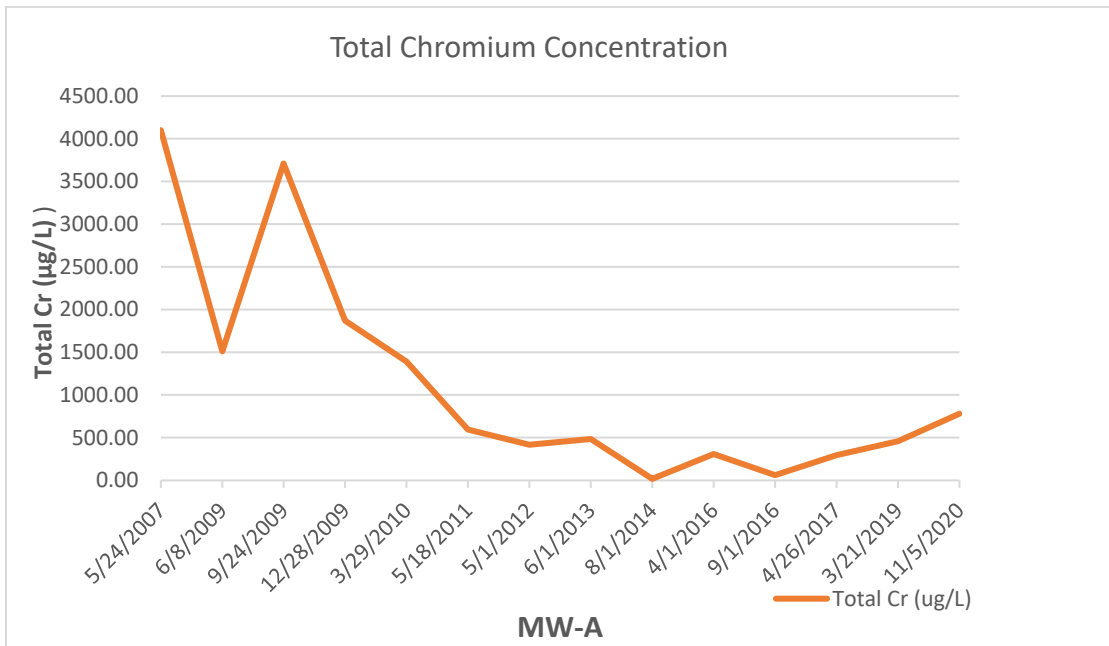


Trends depict sample date versus chromium concentration in micrograms per liter (ug/L)

Attachment C – Trend Analysis Charts

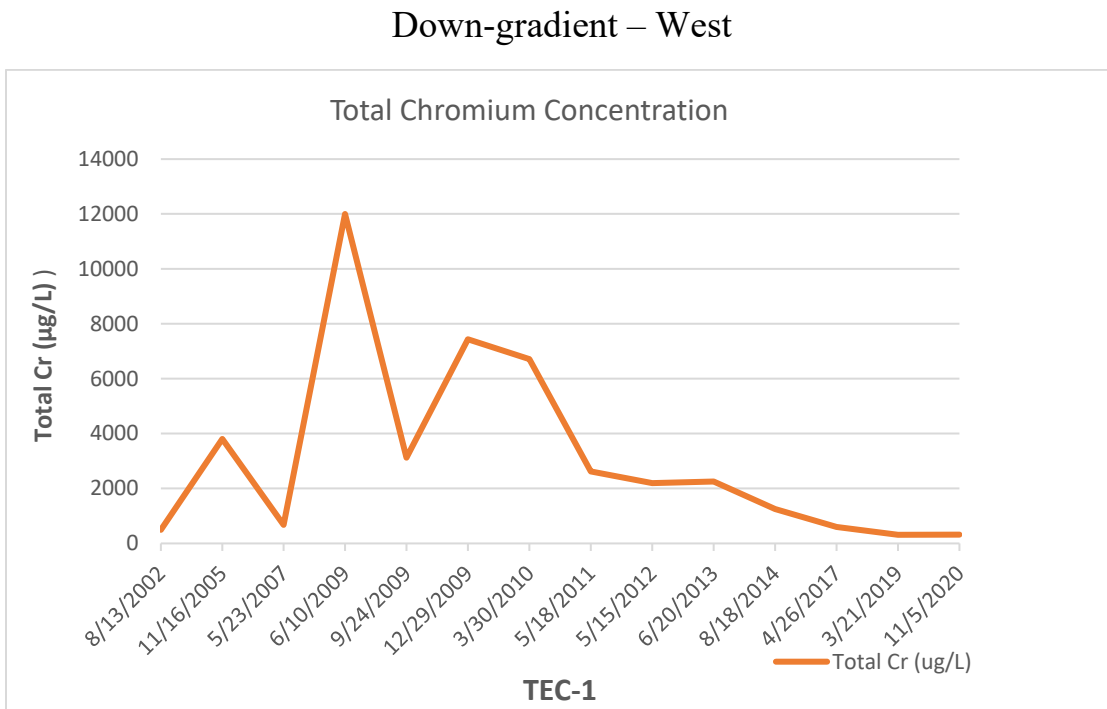
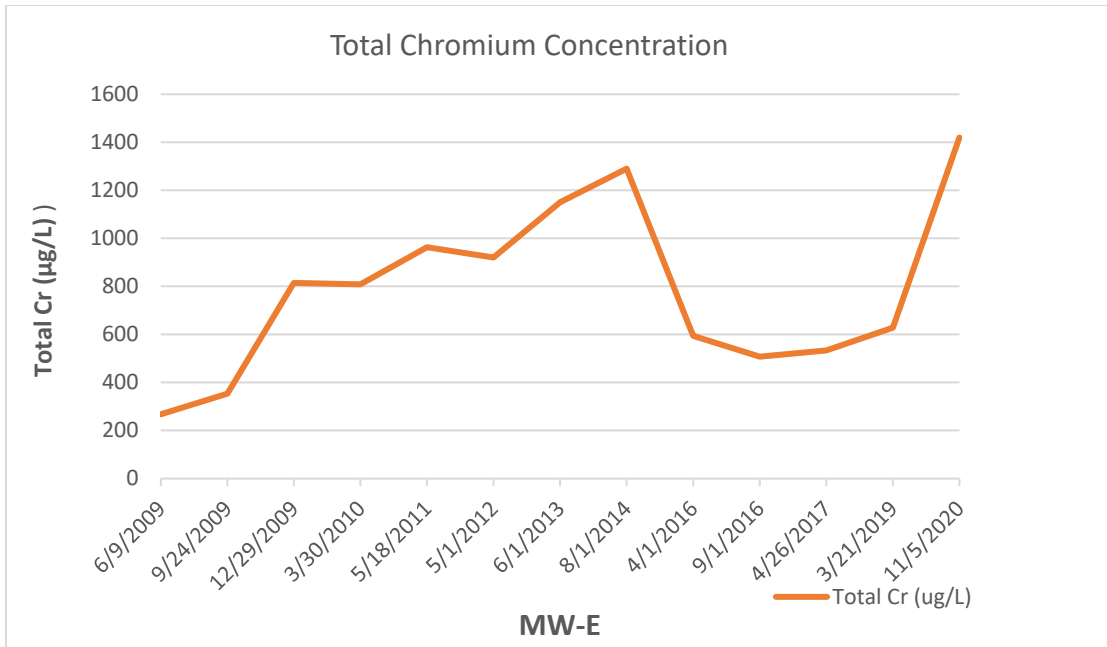


Down-gradient - Southwest



Trends depict sample date versus chromium concentration in micrograms per liter (ug/L)

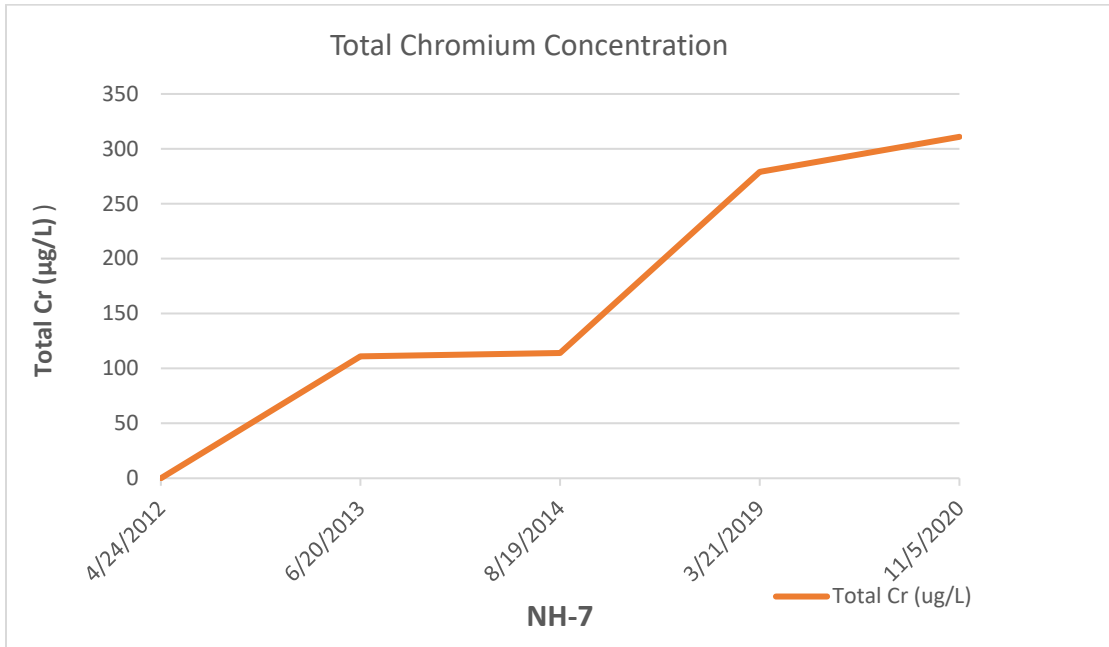
Attachment C – Trend Analysis Charts



Trends depict sample date versus chromium concentration in micrograms per liter (ug/L)

Attachment C – Trend Analysis Charts

Down-gradient - Northwest



Trends depict sample date versus chromium concentration in micrograms per liter (ug/L)