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September 28, 2017

Pablo Valentin
United States Environmental Protection Agency
Region 5
Ralph Metcalfe Federal Building
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

**RE: 2017 Groundwater Monitoring Report
Sheboygan River and Harbor Site
Sheboygan, Wisconsin
SME Project No. 069638.00.029.001**

Dear Pablo:

Pursuant to the Post Remediation Monitoring Plan, SME is providing the groundwater analytical results for the 2017 monitoring event. Six (6) groundwater monitoring wells are located down-gradient of the groundwater monitoring/interceptor trench (GMIT). The wells are sampled for polychlorinated biphenyls (PCBs) following completion of the source removal activities¹. The objective of the monitoring of these wells is to assess the need to operate the GMIT².

Foth conducted the sampling on August 30, 2017. They sampled the down gradient monitoring wells with a low-flow sampler in accordance with the Field Sampling Plan submitted and approved as part of the Phase I Design. A map of the well locations is provided in Attachment 1. The samples were analyzed for total PCBs.

A summary of the 2017 results compared to the historical data is provided in Table 1. Per your request, we also compared the groundwater results to the NR140 groundwater criteria. A copy of the laboratory report is provided in Attachment 2.

There were no detections of PCBs in three of the six wells sampled. At the well that was redeveloped in 2016, MW13, the concentration of PCBs decreased from 1.2 mg/L in 2015 to 0.66 mg/L in 2016 and 0.65 mg/L in 2017. The concentrations of PCBs at monitoring wells MW10 and MW12 have remained stable for the last several years. The wells are down-gradient of the GMIT which has never been operated since it was installed in 2004. The data does not indicate the need to operate the GMIT.

¹ Long-Term Monitoring and Operations Plan, Upper River – Phase 1, PRS and URS, <say 2004.

² Remedial Design Work Plan, Upper River – Phase I and II, PRS and URS, June 2004.

The PCB impact in the three wells is approaching the Maximum Contaminant Level (MCL) exceeding it by 18 to 30%. The stability of the concentration of PCBs at these three wells and the lack of impact in the other wells support the conclusion of our March 2012 evaluation that the PCBs in groundwater pose no threat to the river.

In the past we have concluded that based on the historical data and modeling, as long as the building foundation slab remains acting as an engineering control to prevent infiltration, the river should not be impacted by the groundwater. However, the Phase II investigation of the Tecumseh facility in 2016 demonstrated there were high levels of exposed PCBs outside of the footprint of foundation slab. The concentrations ranged from 0.03 to 15,200 mg/kg with an average of 965 mg/kg. The presence of this exposed impact implies the foundation slab, which limits infiltration, indicates leaching to groundwater is not a significant preferential pathway.

The 2018 monitoring event is scheduled for the summer of 2018. If you have questions regarding the sampling event, feel free to contact me at (513) 319-8919 or egan@sme-usa.com.

Respectfully,

SME

Keith Egan, CP
Senior Consultant

Distribution: Tom Wentland, WDNR
Debbie McMillan, PRS
Peter Johnson, Johnson-Wright
Jason Smith, Tecumseh

TABLES

Table 1
Summary of PCBs in Groundwater
Sheboygan River and Harbor Superfund Site

Date	NR 140 Criteria	MCL	Mean	Maximum	11/17/2004	5/27/2005	12/13/2005	7/10/2006	11/20/2006
Well									
MW9	0.03	0.5	ND	ND	0.47	0.47	0.49	0.49	0.48
MW10			0.6	1.1	0.47	0.48	0.5	NC	1.1
MW12			0.5	1.5	1.5	0.47	0.5	0.47	0.57
MW13			1.2	2.1	1.5	0.48	0.48	2.1	1.1
MW16			ND	0.4	0.49	0.48	0.5	0.47	0.49
MW17			ND	0.27	0.48	0.48	0.48	0.46	0.48

Results in µg/L

Not detected at listed Limit of Detection (LOD)

NC - Not Collected

ND - Not Determined, insufficient detections

J - Concentration is less than Limit of Quantitation (LOQ)

* PCBs were not detected in the duplicate sample

Table 1
Summary of PCBs in Groundwater
Sheboygan River and Harbor Superfund Site

Date	NR 140 Criteria	5/31/2007	10/23/2007	5/14/2008	10/15/2008	5/14/2009	10/22/2009	5/14/2010	10/29/2010
Well									
MW9	0.03	0.49	0.47	0.49	0.24	0.24	0.23	0.29	0.29
MW10		0.49	0.98	0.72	0.5	0.44	0.47	0.39	0.85
MW12		0.46	0.44	0.83	0.23	0.49	0.23	0.33	0.88
MW13		0.82	1.5	1.6	1.9	1.6	1.0	2.0	1.1
MW16		0.4	0.47	0.49	0.24	0.23	0.23	0.29	0.29
MW17		0.51	0.47	0.5	0.24	0.23	0.23	0.3	0.29

Results in µg/L

Not detected at listed Limit of Detection

NC - Not Collected

ND - Not Determined, insufficient detection

J - Concentration is less than Limit of Detection

* PCBs were not detected in the duplicate samples.

Table 1
Summary of PCBs in Groundwater
Sheboygan River and Harbor Superfund Site

Date	NR 140 Criteria	6/29/2011	11/29/2011	6/28/2012	11/7/2012	6/4/2013	6/19/2014	6/11/2015	7/13/2016	8/30/2017
Well										
MW9	0.03	0.29	0.31	0.29	0.31	0.25	0.25	0.24	0.25	0.26
MW10		0.44	0.67	0.38	0.57	0.55	0.57	0.44	0.61	0.65
MW12		0.34	0.31	0.8	0.31	0.25	0.33J	0.30J	0.52	0.59
MW13		1.7	1.5	0.82	0.54	0.44	0.91	1.2	0.66	0.65
MW16		0.29	0.31	0.29	0.31	0.27	0.25	0.24	0.25	0.26
MW17		0.29	0.31	0.29	0.31	0.26	0.27J*	0.24	0.26	0.26

Results in µg/L

Not detected at listed Limit of Detection

NC - Not Collected

ND - Not Determined, insufficient detection

J - Concentration is less than Limit of Detection

* PCBs were not detected in the duplicate sample

ATTACHMENT 1

Project

**SHEBOYGAN RIVER
AND HARBOR
SUPERFUND SITES**

Project Location

**SHEBOYGAN FALLS,
WISCONSIN**

Sheet Name

**TECUMSEH FALLS
PROPERTY
GROUNDWATER
FEATURES**

No.	Revision Date

Date **9-27-17**

CADD **JAB**

Designer **KE**

Scale **1" 100'**

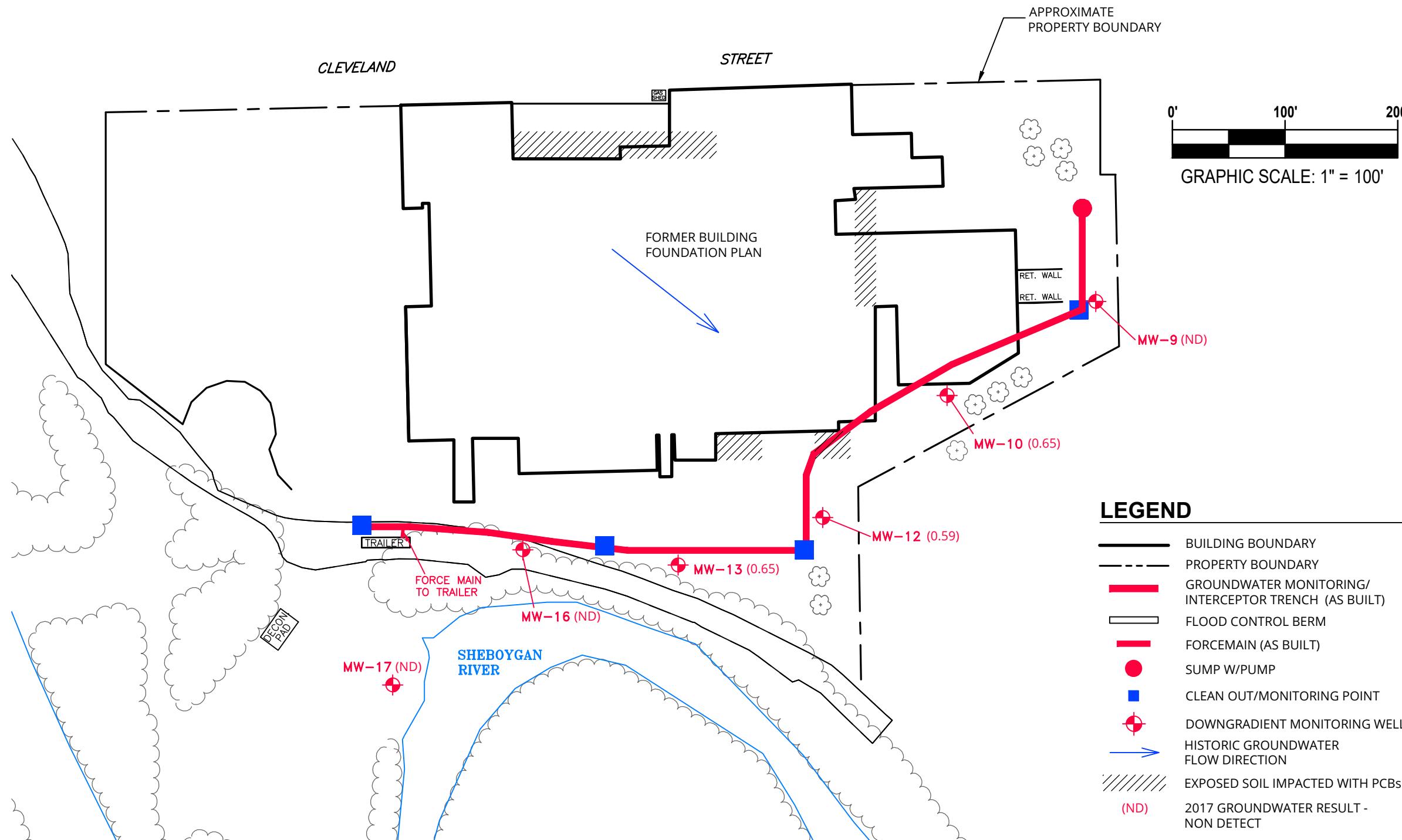
Project **069638.00.029.001**

Figure No.

1

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OTHER SIZE MEDIA

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NOTES:

1. DRAWING INFORMATION PROVIDED BY POLLUTION RISK SERVICES.
2. MW-9, MW-10, MW-12, MW-13, MW-16, AND MW-17 DOWN GRADIENT WELLS INCLUDED IN THE SEMI ANNUAL GROUNDWATER MONITORING.

ATTACHMENT 2

September 05, 2017

Keith Egan
Pollution Risk Services LLC
One North Commerce Park
Suite 318
Cincinnati, OH 452153174

RE: Project: 17S010_2017Q3 SHEBOYGAN RIVER
Pace Project No.: 40155915

Dear Keith Egan:

Enclosed are the analytical results for sample(s) received by the laboratory on August 30, 2017. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

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

Sincerely,



Tod Noltemeyer
tod.noltemeyer@pacelabs.com
(920)469-2436
Project Manager

Enclosures



REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: 17S010_2017Q3 SHEBOYGAN RIVER
Pace Project No.: 40155915

Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302

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

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

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SAMPLE SUMMARY

Project: 17S010_2017Q3 SHEBOYGAN RIVER
 Pace Project No.: 40155915

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40155915001	PHI-MW9_1708	Water	08/30/17 14:55	08/30/17 17:29
40155915002	PHI-MW10_1708	Water	08/30/17 13:05	08/30/17 17:29
40155915003	PHI-MW12_1708	Water	08/30/17 09:55	08/30/17 17:29
40155915004	PHI-MW13_1708	Water	08/29/17 11:00	08/30/17 17:29
40155915005	PHI-MW16_1708	Water	08/30/17 11:35	08/30/17 17:29
40155915006	PHI-MW9 DUP_1708	Water	08/30/17 14:55	08/30/17 17:29
40155915007	PHI-MW9 RB_1708	Water	08/30/17 15:20	08/30/17 17:29
40155915008	PHI-MW17_1708	Water	08/29/17 12:40	08/30/17 17:29

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SAMPLE ANALYTE COUNT

Project: 17S010_2017Q3 SHEBOYGAN RIVER
Pace Project No.: 40155915

Lab ID	Sample ID	Method	Analysts	Analytes Reported
40155915001	PHI-MW9_1708	EPA 8082	BLM	10
40155915002	PHI-MW10_1708	EPA 8082	BLM	10
40155915003	PHI-MW12_1708	EPA 8082	BLM	10
40155915004	PHI-MW13_1708	EPA 8082	BLM	10
40155915005	PHI-MW16_1708	EPA 8082	BLM	10
40155915006	PHI-MW9 DUP_1708	EPA 8082	BLM	10
40155915007	PHI-MW9 RB_1708	EPA 8082	BLM	10
40155915008	PHI-MW17_1708	EPA 8082	BLM	10

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PROJECT NARRATIVE

Project: 17S010_2017Q3 SHEBOYGAN RIVER

Pace Project No.: 40155915

Method: EPA 8082

Description: 8082 GCS PCB

Client: POLLUTION RISK SERVICES

Date: September 05, 2017

General Information:

8 samples were analyzed for EPA 8082. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:

The samples were prepared in accordance with EPA 3510 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

Surrogates:

All surrogates were within QC limits with any exceptions noted below.

QC Batch: 266327

S0: Surrogate recovery outside laboratory control limits.

- PHI-MW12_1708 (Lab ID: 40155915003)
- Tetrachloro-m-xylene (S)

Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 266327

A matrix spike/matrix spike duplicate was not performed due to insufficient sample volume.

Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

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ANALYTICAL RESULTS

Project: 17S010_2017Q3 SHEBOYGAN RIVER

Pace Project No.: 40155915

Sample: PHI-MW9_1708 Lab ID: 40155915001 Collected: 08/30/17 14:55 Received: 08/30/17 17:29 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082 GCS PCB	Analytical Method: EPA 8082 Preparation Method: EPA 3510								
PCB-1016 (Aroclor 1016)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 22:58	12674-11-2	
PCB-1221 (Aroclor 1221)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 22:58	11104-28-2	
PCB-1232 (Aroclor 1232)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 22:58	11141-16-5	
PCB-1242 (Aroclor 1242)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 22:58	53469-21-9	
PCB-1248 (Aroclor 1248)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 22:58	12672-29-6	
PCB-1254 (Aroclor 1254)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 22:58	11097-69-1	
PCB-1260 (Aroclor 1260)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 22:58	11096-82-5	
PCB, Total	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 22:58	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	87	%	48-123		1	08/31/17 10:15	09/01/17 22:58	877-09-8	
Decachlorobiphenyl (S)	66	%	35-125		1	08/31/17 10:15	09/01/17 22:58	2051-24-3	

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ANALYTICAL RESULTS

Project: 17S010_2017Q3 SHEBOYGAN RIVER

Pace Project No.: 40155915

Sample: PHI-MW10_1708 Lab ID: 40155915002 Collected: 08/30/17 13:05 Received: 08/30/17 17:29 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082 GCS PCB	Analytical Method: EPA 8082 Preparation Method: EPA 3510								
PCB-1016 (Aroclor 1016)	<0.26	ug/L	0.53	0.26	1	08/31/17 10:15	09/01/17 23:16	12674-11-2	
PCB-1221 (Aroclor 1221)	<0.26	ug/L	0.53	0.26	1	08/31/17 10:15	09/01/17 23:16	11104-28-2	
PCB-1232 (Aroclor 1232)	<0.26	ug/L	0.53	0.26	1	08/31/17 10:15	09/01/17 23:16	11141-16-5	
PCB-1242 (Aroclor 1242)	0.65	ug/L	0.53	0.26	1	08/31/17 10:15	09/01/17 23:16	53469-21-9	
PCB-1248 (Aroclor 1248)	<0.26	ug/L	0.53	0.26	1	08/31/17 10:15	09/01/17 23:16	12672-29-6	
PCB-1254 (Aroclor 1254)	<0.26	ug/L	0.53	0.26	1	08/31/17 10:15	09/01/17 23:16	11097-69-1	
PCB-1260 (Aroclor 1260)	<0.26	ug/L	0.53	0.26	1	08/31/17 10:15	09/01/17 23:16	11096-82-5	
PCB, Total	0.65	ug/L	0.53	0.26	1	08/31/17 10:15	09/01/17 23:16	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	89	%	48-123		1	08/31/17 10:15	09/01/17 23:16	877-09-8	
Decachlorobiphenyl (S)	82	%	35-125		1	08/31/17 10:15	09/01/17 23:16	2051-24-3	

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ANALYTICAL RESULTS

Project: 17S010_2017Q3 SHEBOYGAN RIVER

Pace Project No.: 40155915

Sample: PHI-MW12_1708 Lab ID: 40155915003 Collected: 08/30/17 09:55 Received: 08/30/17 17:29 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082 GCS PCB	Analytical Method: EPA 8082 Preparation Method: EPA 3510								
PCB-1016 (Aroclor 1016)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 23:33	12674-11-2	
PCB-1221 (Aroclor 1221)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 23:33	11104-28-2	
PCB-1232 (Aroclor 1232)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 23:33	11141-16-5	
PCB-1242 (Aroclor 1242)	0.59	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 23:33	53469-21-9	
PCB-1248 (Aroclor 1248)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 23:33	12672-29-6	
PCB-1254 (Aroclor 1254)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 23:33	11097-69-1	
PCB-1260 (Aroclor 1260)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 23:33	11096-82-5	
PCB, Total	0.59	ug/L	0.51	0.26	1	08/31/17 10:15	09/01/17 23:33	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	140	%	48-123		1	08/31/17 10:15	09/01/17 23:33	877-09-8	S0
Decachlorobiphenyl (S)	85	%	35-125		1	08/31/17 10:15	09/01/17 23:33	2051-24-3	

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ANALYTICAL RESULTS

Project: 17S010_2017Q3 SHEBOYGAN RIVER

Pace Project No.: 40155915

Sample: PHI-MW13_1708 Lab ID: 40155915004 Collected: 08/29/17 11:00 Received: 08/30/17 17:29 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082 GCS PCB	Analytical Method: EPA 8082 Preparation Method: EPA 3510								
PCB-1016 (Aroclor 1016)	<0.27	ug/L	0.53	0.27	1	08/31/17 10:15	09/01/17 23:51	12674-11-2	
PCB-1221 (Aroclor 1221)	<0.27	ug/L	0.53	0.27	1	08/31/17 10:15	09/01/17 23:51	11104-28-2	
PCB-1232 (Aroclor 1232)	<0.27	ug/L	0.53	0.27	1	08/31/17 10:15	09/01/17 23:51	11141-16-5	
PCB-1242 (Aroclor 1242)	0.65	ug/L	0.53	0.27	1	08/31/17 10:15	09/01/17 23:51	53469-21-9	
PCB-1248 (Aroclor 1248)	<0.27	ug/L	0.53	0.27	1	08/31/17 10:15	09/01/17 23:51	12672-29-6	
PCB-1254 (Aroclor 1254)	<0.27	ug/L	0.53	0.27	1	08/31/17 10:15	09/01/17 23:51	11097-69-1	
PCB-1260 (Aroclor 1260)	<0.27	ug/L	0.53	0.27	1	08/31/17 10:15	09/01/17 23:51	11096-82-5	
PCB, Total	0.65	ug/L	0.53	0.27	1	08/31/17 10:15	09/01/17 23:51	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	87	%	48-123		1	08/31/17 10:15	09/01/17 23:51	877-09-8	
Decachlorobiphenyl (S)	64	%	35-125		1	08/31/17 10:15	09/01/17 23:51	2051-24-3	

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ANALYTICAL RESULTS

Project: 17S010_2017Q3 SHEBOYGAN RIVER

Pace Project No.: 40155915

Sample: PHI-MW16_1708 Lab ID: 40155915005 Collected: 08/30/17 11:35 Received: 08/30/17 17:29 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082 GCS PCB	Analytical Method: EPA 8082 Preparation Method: EPA 3510								
PCB-1016 (Aroclor 1016)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/02/17 00:08	12674-11-2	
PCB-1221 (Aroclor 1221)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/02/17 00:08	11104-28-2	
PCB-1232 (Aroclor 1232)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/02/17 00:08	11141-16-5	
PCB-1242 (Aroclor 1242)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/02/17 00:08	53469-21-9	
PCB-1248 (Aroclor 1248)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/02/17 00:08	12672-29-6	
PCB-1254 (Aroclor 1254)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/02/17 00:08	11097-69-1	
PCB-1260 (Aroclor 1260)	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/02/17 00:08	11096-82-5	
PCB, Total	<0.26	ug/L	0.51	0.26	1	08/31/17 10:15	09/02/17 00:08	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	94	%	48-123		1	08/31/17 10:15	09/02/17 00:08	877-09-8	
Decachlorobiphenyl (S)	91	%	35-125		1	08/31/17 10:15	09/02/17 00:08	2051-24-3	

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ANALYTICAL RESULTS

Project: 17S010_2017Q3 SHEBOYGAN RIVER

Pace Project No.: 40155915

Sample: PHI-MW9 DUP_1708 Lab ID: 40155915006 Collected: 08/30/17 14:55 Received: 08/30/17 17:29 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082 GCS PCB	Analytical Method: EPA 8082 Preparation Method: EPA 3510								
PCB-1016 (Aroclor 1016)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:25	12674-11-2	
PCB-1221 (Aroclor 1221)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:25	11104-28-2	
PCB-1232 (Aroclor 1232)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:25	11141-16-5	
PCB-1242 (Aroclor 1242)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:25	53469-21-9	
PCB-1248 (Aroclor 1248)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:25	12672-29-6	
PCB-1254 (Aroclor 1254)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:25	11097-69-1	
PCB-1260 (Aroclor 1260)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:25	11096-82-5	
PCB, Total	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:25	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	94	%	48-123		1	08/31/17 10:15	09/02/17 00:25	877-09-8	
Decachlorobiphenyl (S)	95	%	35-125		1	08/31/17 10:15	09/02/17 00:25	2051-24-3	

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: 17S010_2017Q3 SHEBOYGAN RIVER

Pace Project No.: 40155915

Sample: PHI-MW9 RB_1708 Lab ID: 40155915007 Collected: 08/30/17 15:20 Received: 08/30/17 17:29 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082 GCS PCB	Analytical Method: EPA 8082 Preparation Method: EPA 3510								
PCB-1016 (Aroclor 1016)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:43	12674-11-2	
PCB-1221 (Aroclor 1221)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:43	11104-28-2	
PCB-1232 (Aroclor 1232)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:43	11141-16-5	
PCB-1242 (Aroclor 1242)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:43	53469-21-9	
PCB-1248 (Aroclor 1248)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:43	12672-29-6	
PCB-1254 (Aroclor 1254)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:43	11097-69-1	
PCB-1260 (Aroclor 1260)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:43	11096-82-5	
PCB, Total	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 00:43	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	86	%	48-123		1	08/31/17 10:15	09/02/17 00:43	877-09-8	
Decachlorobiphenyl (S)	45	%	35-125		1	08/31/17 10:15	09/02/17 00:43	2051-24-3	

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ANALYTICAL RESULTS

Project: 17S010_2017Q3 SHEBOYGAN RIVER

Pace Project No.: 40155915

Sample: PHI-MW17_1708 Lab ID: 40155915008 Collected: 08/29/17 12:40 Received: 08/30/17 17:29 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8082 GCS PCB	Analytical Method: EPA 8082 Preparation Method: EPA 3510								
PCB-1016 (Aroclor 1016)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 01:00	12674-11-2	
PCB-1221 (Aroclor 1221)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 01:00	11104-28-2	
PCB-1232 (Aroclor 1232)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 01:00	11141-16-5	
PCB-1242 (Aroclor 1242)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 01:00	53469-21-9	
PCB-1248 (Aroclor 1248)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 01:00	12672-29-6	
PCB-1254 (Aroclor 1254)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 01:00	11097-69-1	
PCB-1260 (Aroclor 1260)	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 01:00	11096-82-5	
PCB, Total	<0.26	ug/L	0.52	0.26	1	08/31/17 10:15	09/02/17 01:00	1336-36-3	
Surrogates									
Tetrachloro-m-xylene (S)	84	%	48-123		1	08/31/17 10:15	09/02/17 01:00	877-09-8	
Decachlorobiphenyl (S)	38	%	35-125		1	08/31/17 10:15	09/02/17 01:00	2051-24-3	

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 17S010_2017Q3 SHEBOYGAN RIVER

Pace Project No.: 40155915

QC Batch: 266327 Analysis Method: EPA 8082

QC Batch Method: EPA 3510 Analysis Description: 8082 GCS PCB

Associated Lab Samples: 40155915001, 40155915002, 40155915003, 40155915004, 40155915005, 40155915006, 40155915007, 40155915008

METHOD BLANK: 1565355 Matrix: Water

Associated Lab Samples: 40155915001, 40155915002, 40155915003, 40155915004, 40155915005, 40155915006, 40155915007, 40155915008

Parameter	Units	Blank Result	Reporting Limit		Analyzed	Qualifiers
			Limit	Analyzed		
PCB-1016 (Aroclor 1016)	ug/L	<0.25	0.50	09/01/17 22:06		
PCB-1221 (Aroclor 1221)	ug/L	<0.25	0.50	09/01/17 22:06		
PCB-1232 (Aroclor 1232)	ug/L	<0.25	0.50	09/01/17 22:06		
PCB-1242 (Aroclor 1242)	ug/L	<0.25	0.50	09/01/17 22:06		
PCB-1248 (Aroclor 1248)	ug/L	<0.25	0.50	09/01/17 22:06		
PCB-1254 (Aroclor 1254)	ug/L	<0.25	0.50	09/01/17 22:06		
PCB-1260 (Aroclor 1260)	ug/L	<0.25	0.50	09/01/17 22:06		
Decachlorobiphenyl (S)	%	85	35-125	09/01/17 22:06		
Tetrachloro-m-xylene (S)	%	84	48-123	09/01/17 22:06		

LABORATORY CONTROL SAMPLE & LCSD: 1565356

1565357

Parameter	Units	Spike Conc.	LCS	LCSD	LCS	LCSD	% Rec	RPD	Max RPD	Qualifiers
			Result	Result	% Rec	% Rec	Limits			
PCB-1016 (Aroclor 1016)	ug/L		<0.25	<0.25					20	
PCB-1221 (Aroclor 1221)	ug/L		<0.25	<0.25					20	
PCB-1232 (Aroclor 1232)	ug/L		<0.25	<0.25					20	
PCB-1242 (Aroclor 1242)	ug/L		<0.25	<0.25					20	
PCB-1248 (Aroclor 1248)	ug/L		<0.25	<0.25					20	
PCB-1254 (Aroclor 1254)	ug/L	5	5.3	4.8	106	96	67-112	10	20	
PCB-1260 (Aroclor 1260)	ug/L		<0.25	<0.25					20	
Decachlorobiphenyl (S)	%				81	62	35-125			
Tetrachloro-m-xylene (S)	%				88	87	48-123			

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.

REPORT OF LABORATORY ANALYSIS

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QUALIFIERS

Project: 17S010_2017Q3 SHEBOYGAN RIVER
Pace Project No.: 40155915

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 and percent moisture.

LOQ - Limit of Quantitation adjusted for dilution factor and percent moisture.

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.

BATCH QUALIFIERS

Batch: 266403

[M5] A matrix spike/matrix spike duplicate was not performed for this batch due to insufficient sample volume.

ANALYTE QUALIFIERS

S0 Surrogate recovery outside laboratory control limits.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: 17S010_2017Q3 SHEBOYGAN RIVER
Pace Project No.: 40155915

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40155915001	PHI-MW9_1708	EPA 3510	266327	EPA 8082	266403
40155915002	PHI-MW10_1708	EPA 3510	266327	EPA 8082	266403
40155915003	PHI-MW12_1708	EPA 3510	266327	EPA 8082	266403
40155915004	PHI-MW13_1708	EPA 3510	266327	EPA 8082	266403
40155915005	PHI-MW16_1708	EPA 3510	266327	EPA 8082	266403
40155915006	PHI-MW9 DUP_1708	EPA 3510	266327	EPA 8082	266403
40155915007	PHI-MW9 RB_1708	EPA 3510	266327	EPA 8082	266403
40155915008	PHI-MW17_1708	EPA 3510	266327	EPA 8082	266403

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CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed and accurate.

✓MRL

1
of
1

Lab Information:		Project Information:		Other Information:	
Lab Name: Pace Analytical Services, Inc	Site ID #: 178010	Site Name: Sheboygan River and Harbor Superfund	Send Invoice to: Gordon Sharp		
Address: 1241 Bellevue Street - Suite 9	Project #: 178010	Address: 7870 E. Kemper Rd., Suite 240	City/State: Cincinnati, OH 45249	Phone #: 920-208-7150	
Green Bay, WI 54301	Site Address:	City/State:	Cincinnati, OH 45249	Phone #:	
Lab P.M.: Tod Noltemyer	City:	State/Zip:	PO#		
Phone/Fax: (608) 232-3300	Site P.M. Name: Kiehl Egan	Phone/Fax: 920-208-7150 / 920-208-7151	Sent EDD to: egan@smme-usa.com		
Lab P.M. email: Tod.Noltemyer@paceelabs.com	Applicable Lab Quote #: egan@smme-usa.com	CC Hardcopy report to: ken.auferman@foth.com	CC Hardcopy report to:		
SAMPLE ID Samples IDs MUST BE UNIQUE		SAMPLE LOCATION	MATRIX CODE G=GRAB C=COMP	SAMPLE DATE & TIME	
ITEM #				# OF CONTAINERS	Comments/Lab Sample I.D.
1	PHI-MW9_1708	001	MW9	WG G 8/29/2017	1455
2	PHI-MW10_1708	002	MW10	WG G 8/30/17	1305
3	PHI-MW12_1708	003	MW12	WG G 8/29/2017	955
4	PHI-MW13_1708	004	MW13	WG G 8/29/2017	1100
5	PHI-MW16_1708	005	MW16	WG G 8/30/17	1135
6	PHI-MW9 DUP_1708	006	MW9	WG G 8/29/2017	1455
7	PHI-MW9 RB_1708	007	MW9	WG G 8/29/2017	1520
8	PHI-MW17_1708	008	MW17	WG G 8/29/2017	1240
9					
10					
11					
Additional Comments/Special Instructions: <i>1-1 Lag A</i> <i>2-1 Lag A</i>					
REASON FOR APPROVAL <i>Melanie J. [Signature]</i>	DATE 8/30/17	ACCEPTED BY APPROVAL <i>Andy Pierre [Signature]</i>	DATE 8/30/17	TIME 1729	Sample Receipt Conditions 5 Y/N Y/N Y/N Y/N Y/N Y/N
SHIPPING INFO Company: PRINT Name of SAMPLER SIGNATURE OF SAMPLER	SAMPLER NAME AND SIGNATURE <i>Andy Pierre [Signature]</i>	DATE Sent 8/30/17	TIME 1729	Temp in 0°C	Samples on Ice? Y/N Y/N Y/N Y/N Y/N Y/N
Tracking #:				Sample intact? Y/N Y/N Y/N Y/N Y/N Y/N	Trip Blank? Y/N Y/N Y/N Y/N Y/N Y/N



Sample Condition Upon Receipt

Pace Analytical Services, LLC. - Green Bay WI
1241 Bellevue Street, Suite 9
Green Bay, WI 54302

Client Name: FothProject #: WO# : 40155915

40155915

Courier: FedEx UPS Client Pace Other:

Tracking #:

Custody Seal on Cooler/Box Present: yes no Seals intact: yes noCustody Seal on Samples Present: yes no Seals intact: yes noPacking Material: Bubble Wrap Bubble Bags None OtherThermometer Used: SR74Type of Ice: Wet Blue Dry NoneCooler Temperature: Uncorr: 4.0 /Corr: 5.0 Biological Tissue is Frozen: yes noTemp Blank Present: yes no

Temp should be above freezing to 6°C.

Biota Samples may be received at ≤ 0°C.

Comments:

Person examining contents:
Date: 8-31-17
Initials: SM

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.
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: - VOA Samples frozen upon receipt	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5. Date/Time:
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	6.
Rush Turn Around Time Requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	7.
Sufficient Volume: <u>8-31-17</u>	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	8. <u>No MS/MSD Volume</u> <u>8-31-17</u>
Correct Containers Used: -Pace Containers Used: -Pace IR Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	9.
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.
Filtered volume received for Dissolved tests	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	11.
Sample Labels match COC: -Includes date/time/ID/Analysis Matrix:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	12.
All containers needing preservation have been checked. (Non-Compliance noted in 13.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	13. <input type="checkbox"/> HNO3 <input type="checkbox"/> H ₂ SO ₄ <input type="checkbox"/> NaOH <input type="checkbox"/> NaOH +ZnAct
All containers needing preservation are found to be in compliance with EPA recommendation. (HNO ₃ , H ₂ SO ₄ ≥2; NaOH+ZnAct ≥9, NaOH ≥12)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
exceptions: VOA, coliform, TOC, TOX, TOH, O&G, WIDROW, Phenolics, OTHER:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Initial when completed
Headspace in VOA Vials (>6mm):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Lab Std #ID of preservative
Trip Blank Present:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Date/Time:
Trip Blank Custody Seals Present	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Pace Trip Blank Lot # (if purchased):		

Client Notification/ Resolution:

Person Contacted:

Date/Time:

If checked, see attached form for additional comments Comments/Resolution: Client crossed out and re-wrote collect dates and times 8-31-17

Project Manager Review:

AR for TNDate: 8-31-17