## Amadi, Eric A - DNR

**From:** Michelle Peters <mpeters@ramboll.com>
**Sent:** Friday, November 22, 2024 12:38 PM
**To:** Amadi, Eric A - DNR
**Cc:** Melinda Dejewski; Lee Anderson; Jon Wallenkamp; Dave Wepking; Katlyn Nohr; Patrick Schloss; Alessi, Timothy G - DNR
**Subject:** RE: Review of NR 716 SIR, NR 722 RAOR, NR 724 RAP. Revision 1; and NR 718 MMP, West Allis Waste Transfer Station, 5032 West Rogers Street, West Allis, WI 53219. BRRTS #: 02-41-594132; FID #: 341368390
**Attachments:** 40287754_frc.pdf

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Hello Eric,

At the WDNR and USEPA's coordinated request, additional soil sampling was conducted at the West Allis WTS site to complete vertical delineation of elevated PCBs found at sample location SB-02 within the former Kinnickinnic Creek Channel. Previous sampling indicated total PCB concentrations of 10.1 mg/kg at 9 to 11 feet below ground surface (bgs) at boring SB-02. This sample was collected within the fill of the former Creek Channel and was observed to have visual and olfactory impacts. No deeper sample was collected at that time.

Following input received by the WNDR on 11/11/24, Ramboll mobilized to the WTS site on 11/19/24 and installed one boring located approximately 3 feet east of the original SB-02, within the Creek Channel. The boring could not be reinstalled at the same exact location due to the temporary well that was installed at SB-02. The new boring SB-02A was installed to 20 feet bgs. Fill was observed to a depth of approximately 12 feet bgs. Visual and olfactory impacts were noted at approximately 9.5-12 feet bgs, consistent with the original SB-02 boring. One sample was collected within the underlying visually unimpacted native clay from a depth interval of 15 to 17 feet bgs and was analyzed for PCBs. PCBs were not detected above laboratory limits in this sample, supporting that PCB impacts are vertically limited within the fill material. The laboratory data report is attached.

Ramboll presents this data as a confirmation that vertical delineation of PCB impacts in the vicinity of boring SB-02 is complete. It is Ramboll and the City of West Allis's understanding that with this data, all requests for additional information by the WDNR have been fulfilled and that the necessary data has been collected for completion of the SI at this site. Please reach out if there are any further questions or clarifications.

Kind regards,
Michelle

**Michelle Peters, PE***

Managing Consultant

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mpeters@ramboll.com

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Classification: Confidential

**From:** Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
**Sent:** Thursday, November 14, 2024 1:51 PM
**To:** Michelle Peters <mpeters@ramboll.com>

**Cc:** Melinda Dejewski <MDejewski@westalliswi.gov>; Lee Anderson <Lee@kuenyarch.com>; Jon Wallenkamp <JonW@kuenyarch.com>; Dave Wepking <dwepking@westalliswi.gov>; Katlyn Nohr <Katlyn.Nohr@Ramboll.com>; Patrick Schloss <pschloss@westalliswi.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
**Subject:** RE: Review of NR 716 SIR, NR 722 RAOR, NR 724 RAP. Revision 1; and NR 718 MMP, West Allis Waste Transfer Station, 5032 West Rogers Street, West Allis, WI 53219. BRRTS #: 02-41-594132; FID #: 341368390

Hi Michelle:

Please see DNR comments below in **blue fonts** (following your responses).

Let us know, if you still want to meet; and we can try to organize a time early next week.

Thanks.

Eric

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Eric Amadi
Phone: (414) 405-0752
eric.amadi@wisconsin.gov

Classification: Confidential

**From:** Michelle Peters <mpeters@ramboll.com>
**Sent:** Tuesday, November 12, 2024 11:23 AM
**To:** Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
**Cc:** Melinda Dejewski <MDejewski@westalliswi.gov>; Lee Anderson <Lee@kuenyarch.com>; Jon Wallenkamp <JonW@kuenyarch.com>; Dave Wepking <dwepking@westalliswi.gov>; Katlyn Nohr <Katlyn.Nohr@Ramboll.com>; Patrick Schloss <pschloss@westalliswi.gov>
**Subject:** RE: Review of NR 716 SIR, NR 722 RAOR, NR 724 RAP. Revision 1; and NR 718 MMP, West Allis Waste Transfer Station, 5032 West Rogers Street, West Allis, WI 53219. BRRTS #: 02-41-594132; FID #: 341368390

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Eric and Tim,

Your request for one additional soil sample delineating PCB impacts at/near SB-2 is noted. We will collect an additional soil sample from the native soil underlying the fill material placed within the former Creek channel in this area. This sample will be analyzed for PCBs for purposes of vertically delineating the elevated PCB detection in fill soils in SB-2. We would appreciate additional visibility into WDNR's coordination with USEPA related to this PCB detection.

Your request for revised delineation contours for PCBs and VOCs is also noted. We will revise figures 5A and 5B consistent with your request.

Given the anticipated start of initial construction activities on this site next week (November 18th) and understanding that the above items will be provided as soon as feasible, we are requesting WDNR provide email approval that

earthwork activities on the site can begin on November 18th, consistent with the WDNR's concurrence with the recommendation that implementation of a barrier cap sitewide is appropriate for the site, indicated in the letter dated October 21st, and absence of comments on the site's soil management plan (SMP) other than the two administrative items identified in the letter dated October 21st (corrected in the City's response dated October 29th).

**DNR comment to clarify how we coordinate with the USEPA on sites with PCBs contamination and the response to your request for email approval to start earthwork activities on the site on November 18th:**
The DNR is required to notify the EPA when PCB contamination is reported at a site. The concentrations found, media impacted and historical information on the discharge are used to determine whether the cleanup is subject to both state and federal regulations. Regardless of whether the site is subject to state, or both state and federal regulations, a complete site investigation that defines the degree and extent of PCB contamination in all affected media is required.

The DNR considers the information available at the time it notifies the EPA to recommend a site classification under the One Cleanup Program Memorandum of Agreement (OCP MOA). As a site investigation progresses, new information may become available that changes the site classification. At the West Allis Waste Transfer Station site, the available information supported a Type B classification under the OCP MOA where TSCA regulations would not apply. However, the SI is incomplete as the vertical extent of PCB contamination is unknown. The DNR is required to notify the EPA if additional information obtained through the SI indicates that the site should also be regulated under TSCA.

The DNR recognizes that the SI is an iterative process and recommends that it be completed prior to implementing a remedial action. If a decision is made to proceed with a remedial action and redevelopment plans before completing the SI, the RP takes the risk that modifications and additional actions may be required if new information gained through the SI determines that it is necessary. This can lead to increased costs and delays in use of the property as intended.

More information on PCB cleanups in Wisconsin can be found on the RR Program's website in documents RR-786 (PCB Remediation in Wisconsin under the OCP MOA) and RR-064 (OCP MOA).

With respect to WDNR's comment related to the characterization of the cold storage structure as an "occupied" building, and corresponding request for additional vapor intrusion assessment, the City does not agree with this characterization of the structure as "occupied". What statute or definition is WDNR using to characterize the storage structure as an "occupied" building? What prevents the City from characterizing the use of the storage structure they will own and operate? We would like to schedule a call as soon as possible with WDNR staff, presumably a member of the VI group, to discuss the basis for WDNR's characterization of the structure as "occupied". We would appreciate this meeting occurring this week or next week.

**DNR Comment:**
The storage structure is considered as an "occupied" building because it will have some occupancy even if temporary/occasional. Thus, our original vapor comments still stand.

Kind regards,
Michelle

**Michelle Peters, PE***

Managing Consultant

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**From:** Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
**Sent:** Monday, November 11, 2024 4:52 PM

**To:** Michelle Peters <mpeters@ramboll.com>; Patrick Schloss <pschloss@westalliswi.gov>
**Cc:** Melinda Dejewski <MDejewski@westalliswi.gov>; Lee Anderson <Lee@kuenyarch.com>; Jon Wallenkamp <JonW@kuenyarch.com>; Dave Wepking <dwepking@westalliswi.gov>; Katlyn Nohr <Katlyn.Nohr@Ramboll.com>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
**Subject:** RE: Review of NR 716 SIR, NR 722 RAOR, NR 724 RAP. Revision 1; and NR 718 MMP, West Allis Waste Transfer Station, 5032 West Rogers Street, West Allis, WI 53219. BRRTS #: 02-41-594132; FID #: 341368390

Hi Michelle and Patrick:

Please see the DNR comments below in **blue fonts** (following your responses).

Let us know if you have questions.

Thanks.

Eric

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Eric Amadi
Phone: (414) 405-0752
eric.amadi@wisconsin.gov

Classification: Confidential

---

**From:** Michelle Peters <mpeters@ramboll.com>
**Sent:** Tuesday, October 29, 2024 1:56 PM
**To:** Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>; Patrick Schloss <pschloss@westalliswi.gov>
**Cc:** Melinda Dejewski <MDejewski@westalliswi.gov>; Lee Anderson <Lee@kuenyarch.com>; Jon Wallenkamp <JonW@kuenyarch.com>; Dave Wepking <dwepking@westalliswi.gov>; Katlyn Nohr <Katlyn.Nohr@Ramboll.com>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
**Subject:** RE: Review of NR 716 SIR, NR 722 RAOR, NR 724 RAP. Revision 1; and NR 718 MMP, West Allis Waste Transfer Station, 5032 West Rogers Street, West Allis, WI 53219. BRRTS #: 02-41-594132; FID #: 341368390

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Hello Eric and Tim,

Thank you for this response letter and for your time to discuss the Department's feedback. They City of West Allis appreciates WDNR's collaboration on this redevelopment project. Based on the discussion during the call on October 24th, 2024, we are providing the responses below on each of the comments received. In support of these responses, revised figures and tables to accompany the SIR/RAOR/RAP report are attached. WDNR comments are displayed in bold and responses are provided thereafter. We look forward to your review of these responses in anticipation of a planned start to construction activities in early November 2024. If Ramboll or the City of West Allis can provide any further clarity on the topics below, please do not hesitate to reach out.

Kind regards,
Michelle

***Soil***

**Soil sample at SB-2 (9 - 11 feet bgs) showed elevated PCBs level. Determine the extent of PCBs.**
There is a single soil sample (in boring SB-02) in which the detected concentration of PCBs exceeds the industrial direct contact (IDC) RCL. This sample came from deeper than 4 feet and as such is not within the direct contact interval. The exceedance contours on Ramboll's figures have been revised to include a contour for detections of PCBs relative the direct contact exceedances, regardless of sample depth. As shown on revised Figure 5B, there is a single exceedance IDC RCL exceedance for PCBs and PCBs above the direct contact interval are otherwise delineated to fill soils placed within the former Kinnickinnic Creek Channel.

Based on borings conducted for this investigation, the Site is underlain by 4 to 12 feet of re-worked soil/fill material. The observed depth of fill was greatest, approximately 10 to 12 feet, in soil borings advanced within the extent of the former Kinnickinnic Creek Channel. Based on observed thickness of fill, it is Ramboll's understanding that the former creek channel was filled in 1946 as part of the rerouting of the Kinnickinnic Creek Channel to the east of the site, prior to the placement of surficial fill across the site in support of its development as the City of West Allis waste incinerator facility. As such, the characteristics of the deeper fill within the former creek channel are somewhat different from other fill soils present at the site. Fill materials of varying thickness across the site were observed to be underlain by native silty clay.

Based on the delineation of PCB concentrations above the IDC RCL to within the former Kinnickinnic Creek Channel, specifically to a single sample (SB-02 [9-11']), and the understanding that deeper fill within the former channel was placed prior to the placement of surficial fill site-wide, the samples from within the former channel are representative of localized conditions and not site-wide conditions. PCBs were not detected above the IDC RCL in soil samples from MW-1 to the east, also collected from within the former channel. As shown on Figure 5B, the extent of PCBs at concentrations above the IDC RCL are defined to a limited area in the western portion of the former Kinnickinnic Creek Channel. Consistent with the approved remedy including a site-wide direct contact barrier, further sampling in this area is not warranted.

**DNR Additional Comment:**
**The DNR requests additional PCBs vertical delineation of the impacts found at SB-2 (will be a new location within the Creek Channel but nearby due to the temporary well, TW-2), since this is a coordinated approval with USEPA. Figures and/or Cross Sections may be updated (based on the results).**

.

**On soil tables, compare soil concentrations to all RCLs (regardless of depth).** Ramboll has added data flags for all RCLs to the tables, regardless of sample depth.

**DNR Additional Comment:**
**Thank you for addressing our concern**

**On soil tables, include the columns "saturated vs. non-saturated" and "soil types (Fill/Native)".** Ramboll has added "saturated vs. non-saturated" and "soil types (Fill/Native)" to each soil sample presented in the data tables.

**DNR Additional Comment:**
**Thank you for addressing our concern**

**For fill related impacts, the RCL lines need to be extended to the site boundaries.** As discussed, Ramboll has adjusted the contours for PAHs and metals for all RCLs to extend to the property boundaries, consistent with our understanding that these constituents are associated with site-wide fill placement. Exceedances of PCBs and PVOCs are defined to discrete areas. As such, those contours do not extend to the property boundary.

**DNR Additional Comment:**
**PCBs RCL lines > IDC need to be dashed and pushed further towards the east, near MW-1; west, towards property boundary line and near SB-7; south, towards SB-6 and MW-3; and north, near SB-5 and MW-2 - Figure 5B**
**Similar exercise applies to VOCs RCL lines in Figure 5A.**

**Lines should not extend offsite at SB-7 and SB-8.** Samples SB-07 and SB-08, which are located on the north and west-adjoining former Teledyne Motors property, have been excluded from site contours. This data will be presented in a forthcoming submittal related to the adjoining former Teledyne property.

**DNR Additional Comment:**

**Thank you for addressing our concern**

***Groundwater***
**Proposal to re-install wells after redevelopment is acceptable**. Noted.

**DNR Additional Comment:**
**No further comment**

**A work plan will need to be submitted for the post-development well network.** A work plan describing proposed post-construction groundwater monitoring, including the proposed placement/replacement of monitoring wells on the site and analytical sampling, will be provided to WDNR following the completion of construction activities on this site.

**DNR Additional Comment:**
**Thank you in advance for addressing our concern.**

**Monitoring wells (MW-1 and TW-2) should be sampled for PCBs prior to abandonment**. Ramboll is planning to sample these two wells for PCBs prior to the start of construction activities. For purposes of establishing baseline pre-construction conditions in groundwater, we anticipate using USEPA Method 8082A. Please confirm as soon as possible whether this method is acceptable to WDNR.

**DNR Additional Comment:**
**Thank you for submitting the PCBs groundwater monitoring results for monitoring wells MW-1 and TW-2**

***Vapor***
**There are NAPL indicators of Benzene and Naphthalene within screening range of the proposed building. This will need to be taken into consideration for vapor screening of the proposed building.** WDNR's letter uses the term 'building', implying that it is an 'occupied building', as described in vapor intrusion guidance document RR-800, but this is a cold storage structure, so we do not agree that the terms are equivalent. Per Wis. Admin. Code § NR 716.11(5)(g), sub-slab vapor sampling is required when soil, soil gas, or groundwater indicates vapor may migrate to the foundation of an occupied building. The future structure is a cold-storage structure intended to house seasonal tools and equipment in connection with the nearby Department of Public Works (DPW) facility, currently under construction. It will be accessed only by DPW employees, and only on a very limited basis for purposes of moving the seasonal tools. The figures have been revised to refer to the future structure as an "unoccupied storage structure" to clarify that this is not an occupied building and is accordingly not subject to the requirement for VI assessment as described in RR-800.

**DNR Additional Comment:**
**Even though employees will only access the building on a limited basis, it still counts as "occupied" for our purposes and thus, our original vapor comments still stand.**

***Emerging Contaminants***
**The DNR has reviewed the emerging contaminant statement and evaluation contained within the Report and agrees that based on the historic use of the property, it is unlikely that emerging contaminants were used, stored, or handled on the site. Therefore, no sampling is needed to complete the investigation at this time. This decision may be reevaluated if new information is received in the future.** Noted.

**DNR Additional Comment:**
**No further comment**

***RAOR/RAP***
**The DNR concurs with the recommendation in the Report that implementation of a barrier cap sitewide is appropriate for the Site.** Noted.

**DNR Additional Comment:**
**No further comment**

***Soil Management Plan (MMP)***

**Include the exemption to place material within three (3) feet of water table (Locational Criteria).** This selection has been included in the revised Form 4400-315 (attached).

**DNR Additional Comment:**
**Thank you for addressing our concern**

**Uncheck the box for "Use of Industrial Land Use Soil Standards."** This selection has been unchecked in the revised Form 4400-315 (attached).

**DNR Additional Comment:**
**Thank you for addressing our concern**

***Other DNR Comments***
**In accordance with regulatory authority, the DNR has notified the USEPA of the PCBs detected at the Site. We will provide you with updates when we receive information from the USEPA.**
Noted.

**DNR Additional Comment:**
**No further comment**

**Michelle Peters, PE***

Managing Consultant

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mpeters@ramboll.com

* PE - CO, UT, WI

Classification: Confidential

**From:** Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
**Sent:** Monday, October 21, 2024 11:41 AM
**To:** Patrick Schloss <pschloss@westalliswi.gov>
**Cc:** Melinda Dejewski <MDejewski@westalliswi.gov>; Michelle Peters <mpeters@ramboll.com>; Lee Anderson <Lee@kuenyarch.com>; Jon Wallenkamp <JonW@kuenyarch.com>; Dave Wepking <dwepking@westalliswi.gov>; Katlyn Nohr <Katlyn.Nohr@Ramboll.com>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
**Subject:** Review of NR 716 SIR, NR 722 RAOR, NR 724 RAP. Revision 1; and NR 718 MMP, West Allis Waste Transfer Station, 5032 West Rogers Street, West Allis, WI 53219. BRRTS #: 02-41-594132; FID #: 341368390

Hi Patrick:

Please see the attached letter regarding the referenced subject. If you have questions, please let us know.

Thanks.

Eric

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Eric Amadi
Phone: (414) 405-0752
eric.amadi@wisconsin.gov

**Pace Analytical Services, LLC**
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

November 22, 2024

Michelle Peters
Ramboll

,

RE: Project: West Allis WTS
Pace Project No.: 40287754

Dear Michelle Peters:

Enclosed are the analytical results for sample(s) received by the laboratory on November 20, 2024. 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,

Christopher Hyska for
Steven Mleczko
steve.mleczko@pacelabs.com
(920)469-2436
Project Manager

Enclosures

cc: Kyle Heimstead, Ramboll US Consulting, Inc.
Katlyn Nohr, Ramboll
Katie Phillips, Ramboll



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1241 Bellevue Street - Suite 9
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## CERTIFICATIONS

| | |
|---|---|
| Project: | West Allis WTS |
| Pace Project No.: | 40287754 |

**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
South Carolina Certification #: 83006001
Texas Certification #: T104704529-21-8
Virginia VELAP Certification ID: 11873
Wisconsin Certification #: 405132750
Wisconsin DATCP Certification #: 105-444
USDA Soil Permit #: P330-21-00008
Federal Fish & Wildlife Permit #: 51774A



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## SAMPLE SUMMARY

Project: West Allis WTS
Pace Project No.: 40287754

| Lab ID | Sample ID | Matrix | Date Collected | Date Received |
|---|---|---|---|---|
| **40287754001** | **SB-02A (15-17)** | Solid | 11/19/24 08:50 | 11/20/24 09:05 |



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## SAMPLE ANALYTE COUNT

Project: West Allis WTS
Pace Project No.: 40287754

| Lab ID | Sample ID | Method | Analysts | Analytes Reported | Laboratory |
|---|---|---|---|---|---|
| **40287754001** | **SB-02A (15-17)** | EPA 8082A | KLA | 10 | PASI-G |
| | | ASTM D2974-87 | NMK | 1 | PASI-G |

PASI-G = Pace Analytical Services - Green Bay



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## SUMMARY OF DETECTION

Project: West Allis WTS
Pace Project No.: 40287754

| Lab Sample ID<br>Method | Client Sample ID<br>Parameters | Result | Units | Report Limit | Analyzed | Qualifiers |
|---|---|---|---|---|---|---|
| **40287754001** | **SB-02A (15-17)** | | | | | |
| ASTM D2974-87 | Percent Moisture | 16.9 | % | 0.10 | 11/20/24 18:11 | |



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# ANALYTICAL RESULTS

Project: West Allis WTS
Pace Project No.: 40287754

**Sample: SB-02A (15-17)** **Lab ID: 40287754001** Collected: 11/19/24 08:50 Received: 11/20/24 09:05 Matrix: Solid

***Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.***

| Parameters | Results | Units | LOQ | LOD | DF | Prepared | Analyzed | CAS No. | Qual |
|---|---|---|---|---|---|---|---|---|---|
| **8082A GCS PCB** | Analytical Method: EPA 8082A Preparation Method: EPA 3541 | | | | | | | | |
| | Pace Analytical Services - Green Bay | | | | | | | | |
| PCB-1016 (Aroclor 1016) | **<18.3** | ug/kg | 60.2 | 18.3 | 1 | 11/21/24 10:24 | 11/21/24 18:22 | 12674-11-2 | |
| PCB-1221 (Aroclor 1221) | **<18.3** | ug/kg | 60.2 | 18.3 | 1 | 11/21/24 10:24 | 11/21/24 18:22 | 11104-28-2 | |
| PCB-1232 (Aroclor 1232) | **<18.3** | ug/kg | 60.2 | 18.3 | 1 | 11/21/24 10:24 | 11/21/24 18:22 | 11141-16-5 | |
| PCB-1242 (Aroclor 1242) | **<18.3** | ug/kg | 60.2 | 18.3 | 1 | 11/21/24 10:24 | 11/21/24 18:22 | 53469-21-9 | |
| PCB-1248 (Aroclor 1248) | **<18.3** | ug/kg | 60.2 | 18.3 | 1 | 11/21/24 10:24 | 11/21/24 18:22 | 12672-29-6 | |
| PCB-1254 (Aroclor 1254) | **<18.3** | ug/kg | 60.2 | 18.3 | 1 | 11/21/24 10:24 | 11/21/24 18:22 | 11097-69-1 | |
| PCB-1260 (Aroclor 1260) | **<18.3** | ug/kg | 60.2 | 18.3 | 1 | 11/21/24 10:24 | 11/21/24 18:22 | 11096-82-5 | |
| PCB, Total | **<18.3** | ug/kg | 60.2 | 18.3 | 1 | 11/21/24 10:24 | 11/21/24 18:22 | 1336-36-3 | |
| ***Surrogates*** | | | | | | | | | |
| Tetrachloro-m-xylene (S) | 88 | % | 65-120 | | 1 | 11/21/24 10:24 | 11/21/24 18:22 | 877-09-8 | |
| Decachlorobiphenyl (S) | 68 | % | 55-120 | | 1 | 11/21/24 10:24 | 11/21/24 18:22 | 2051-24-3 | |
| **Percent Moisture** | Analytical Method: ASTM D2974-87 | | | | | | | | |
| | Pace Analytical Services - Green Bay | | | | | | | | |
| Percent Moisture | **16.9** | % | 0.10 | 0.10 | 1 | | 11/20/24 18:11 | | |



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# QUALITY CONTROL DATA

Project: West Allis WTS
Pace Project No.: 40287754

QC Batch: 490866
QC Batch Method: EPA 3541
Analysis Method: EPA 8082A
Analysis Description: 8082 GCS PCB
Laboratory: Pace Analytical Services - Green Bay
Associated Lab Samples: 40287754001

METHOD BLANK: 2810607 Matrix: Solid
Associated Lab Samples: 40287754001

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|---|---|---|---|---|---|
| PCB-1016 (Aroclor 1016) | ug/kg | <15.2 | 50.0 | 11/21/24 15:27 | |
| PCB-1221 (Aroclor 1221) | ug/kg | <15.2 | 50.0 | 11/21/24 15:27 | |
| PCB-1232 (Aroclor 1232) | ug/kg | <15.2 | 50.0 | 11/21/24 15:27 | |
| PCB-1242 (Aroclor 1242) | ug/kg | <15.2 | 50.0 | 11/21/24 15:27 | |
| PCB-1248 (Aroclor 1248) | ug/kg | <15.2 | 50.0 | 11/21/24 15:27 | |
| PCB-1254 (Aroclor 1254) | ug/kg | <15.2 | 50.0 | 11/21/24 15:27 | |
| PCB-1260 (Aroclor 1260) | ug/kg | <15.2 | 50.0 | 11/21/24 15:27 | |
| Decachlorobiphenyl (S) | % | 81 | 55-120 | 11/21/24 15:27 | |
| Tetrachloro-m-xylene (S) | % | 101 | 65-120 | 11/21/24 15:27 | |

LABORATORY CONTROL SAMPLE: 2810608

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|---|---|---|---|---|---|---|
| PCB-1016 (Aroclor 1016) | ug/kg | | <15.2 | | | |
| PCB-1221 (Aroclor 1221) | ug/kg | | <15.2 | | | |
| PCB-1232 (Aroclor 1232) | ug/kg | | <15.2 | | | |
| PCB-1242 (Aroclor 1242) | ug/kg | | <15.2 | | | |
| PCB-1248 (Aroclor 1248) | ug/kg | | <15.2 | | | |
| PCB-1254 (Aroclor 1254) | ug/kg | | <15.2 | | | |
| PCB-1260 (Aroclor 1260) | ug/kg | 501 | 382 | 76 | 68-120 | |
| Decachlorobiphenyl (S) | % | | | 76 | 55-120 | |
| Tetrachloro-m-xylene (S) | % | | | 97 | 65-120 | |

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2810609 2810610

| Parameter | Units | 40287754001 Result | MS Spike Conc. | MSD Spike Conc. | MS Result | MSD Result | MS % Rec | MSD % Rec | % Rec Limits | RPD | Max RPD | Qual |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PCB-1016 (Aroclor 1016) | ug/kg | <18.3 | | | <18.3 | <18.3 | | | | | 20 | |
| PCB-1221 (Aroclor 1221) | ug/kg | <18.3 | | | <18.3 | <18.3 | | | | | 20 | |
| PCB-1232 (Aroclor 1232) | ug/kg | <18.3 | | | <18.3 | <18.3 | | | | | 20 | |
| PCB-1242 (Aroclor 1242) | ug/kg | <18.3 | | | <18.3 | <18.3 | | | | | 20 | |
| PCB-1248 (Aroclor 1248) | ug/kg | <18.3 | | | <18.3 | <18.3 | | | | | 20 | |
| PCB-1254 (Aroclor 1254) | ug/kg | <18.3 | | | <18.3 | <18.3 | | | | | 20 | |
| PCB-1260 (Aroclor 1260) | ug/kg | <18.3 | 599 | 600 | 402 | 393 | 67 | 65 | 45-126 | 2 | 20 | |
| Decachlorobiphenyl (S) | % | | | | | | 66 | 66 | 55-120 | | | |
| Tetrachloro-m-xylene (S) | % | | | | | | 90 | 87 | 65-120 | | | |

**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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**Pace Analytical Services, LLC**
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

# QUALITY CONTROL DATA

Project: West Allis WTS
Pace Project No.: 40287754

QC Batch: 490792
QC Batch Method: ASTM D2974-87
Analysis Method: ASTM D2974-87
Analysis Description: Dry Weight/Percent Moisture
Laboratory: Pace Analytical Services - Green Bay

Associated Lab Samples: 40287754001

SAMPLE DUPLICATE: 2810379

| Parameter | Units | 40287691003 Result | Dup Result | RPD | Max RPD | Qualifiers |
|---|---|---|---|---|---|---|
| Percent Moisture | % | 3.9 | 4.2 | 7 | 10 | |

**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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Green Bay, WI 54302
(920)469-2436

# QUALIFIERS

Project: West Allis WTS
Pace Project No.: 40287754

**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 - The reported result is an estimated value.

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.

DL - Adjusted Method Detection Limit.

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 - Analyte was not detected and is reported as less than the LOD or as defined by the customer.

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.



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## QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: West Allis WTS
Pace Project No.: 40287754

| Lab ID | Sample ID | QC Batch Method | QC Batch | Analytical Method | Analytical Batch |
|---|---|---|---|---|---|
| **40287754001** | **SB-02A (15-17)** | EPA 3541 | 490866 | EPA 8082A | 490869 |
| **40287754001** | **SB-02A (15-17)** | ASTM D2974-87 | 490792 | | |



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# CHAIN-OF-CUSTODY Analytical Request Document

Chain-of-Custody is a LEGAL DOCUMENT - Complete all relevent fields

LAB USE ONLY- Affix Workorder/Login Label Here or List Pace Workorder Number or MTJL Log-in Number Here: 40287754

**ALL SHADED AREAS are for LAB USE ONLY**

Company: Ramboll

Billing Information:

Address: 234 W Florida St 5th Floor 53204 Milwaukee WI

Report To: Michelle Peters

Email To: mpeters@ramboll.com

Copy To:

Site Collection Info/Address:

Customer Project Name/Number: West Allis WTS

State: WI / County/City: Milwaukee / Time Zone Collected: [ ] PT [ ] MT [X] CT [ ] ET

Phone: 920-366-2365
Email: kathlyn.nohr@ramboll.com

Site/Facility ID #:

Compliance Monitoring? [ ] Yes [ ] No

Collected By (print): Kathlyn Nohr

Purchase Order #:
Quote #:

DW PWS ID #:
DW Location Code:

Collected By (signature):

Turnaround Date Required: 48 hours / ASAP

Immediately Packed on Ice: [X] Yes [ ] No

Sample Disposal: [X] Dispose as appropriate [ ] Return [ ] Archive: _____ [ ] Hold: _____

Rush: [ ] Same Day [X] Next Day [ ] 2 Day [ ] 3 Day [ ] 4 Day [ ] 5 Day (Expedite Charges Apply)

Field Filtered (if applicable): [ ] Yes [X] No
Analysis: _____

Container Preservative Type **: U

Lab Project Manager:

** Preservative Types: (1) nitric acid, (2) sulfuric acid, (3) hydrochloric acid, (4) sodium hydroxide, (5) zinc acetate, (6) methanol, (7) sodium bisulfate, (8) sodium thiosulfate, (9) hexane, (A) ascorbic acid, (B) ammonium sulfate, (C) ammonium hydroxide, (D) TSP, (U) Unpreserved, (O) Other _____

Analyses: PCBs

Lab Profile/Line:

Lab Sample Receipt Checklist:

| | |
|---|---|
| Custody Seals Present/Intact | Y N NA |
| Custody Signatures Present | Y N NA |
| Collector Signature Present | Y N NA |
| Bottles Intact | Y N NA |
| Correct Bottles | Y N NA |
| Sufficient Volume | Y N NA |
| Samples Received on Ice | Y N NA |
| VOA - Headspace Acceptable | Y N NA |
| USDA Regulated Soils | Y N NA |
| Samples in Holding Time | Y N NA |
| Residual Chlorine Present | Y N NA |
| Cl Strips: | |
| Sample pH Acceptable | Y N NA |
| pH Strips: | |
| Sulfide Present | Y N NA |
| Lead Acetate Strips: | |

LAB USE ONLY:
Lab Sample # / Comments:

1 11/20/24 CCW

* Matrix Codes (Insert in Matrix box below): Drinking Water (DW), Ground Water (GW), Wastewater (WW), Product (P), Soil/Solid (SL), Oil (OL), Wipe (WP), Air (AR), Tissue (TS), Bioassay (B), Vapor (V), Other (OT)

| Customer Sample ID | Matrix * | Comp / Grab | Collected (or Composite Start) Date | Collected (or Composite Start) Time | Composite End Date | Composite End Time | Res Cl | # of Ctns | PCBs | Lab Sample # / Comments |
|---|---|---|---|---|---|---|---|---|---|---|
| SB-02A (15-17) | SL | G | 11/19/24 | 08:50 | | | | 1 | X | 001 |

KRW 11/19/24

KRW 11/19/24

Customer Remarks / Special Conditions / Possible Hazards:

Type of Ice Used: Wet Blue Dry None

Packing Material Used:

Radchem sample(s) screened (<500 cpm): Y N NA

SHORT HOLDS PRESENT (<72 hours): Y N N/A

Lab Tracking #: 2823859

Samples received via: FEDEX UPS Client Courier Pace Courier

Lab Sample Temperature Info:
Temp Blank Received: Y N NA
Therm ID#: _____
Cooler 1 Temp Upon Receipt: _____ oC
Cooler 1 Therm Corr. Factor: _____ oC
Cooler 1 Corrected Temp: _____ oC
Comments:

1

| Relinquished by/Company: (Signature) | Date/Time: | Received by/Company: (Signature) | Date/Time: |
|---|---|---|---|
| Ramboll | 11/19/24 @ 1430 | CS Logistics | 11/19/24 @ 1430 |
| CS logistics | 11/20/24 0905 | Pace | 11/20/24 0905 |
| | | | |

MTJL LAB USE ONLY
Table #:
Acctnum:
Template:
Prelogin:
PM:
PB:

Trip Blank Received: Y N NA
HCL MeOH TSP Other

Non Conformance(s): YES / NO

# Sample Preservation Receipt Form

Client Name: Ramboll

Project # 40287754

All containers needing preservation have been checked and noted below: ☐Yes ☐No ☒N/A

Lab Lot# of pH paper:

Lab Std #ID of preservation (if pH adjusted):

Initial when completed:

Date/ Time:

| Pace Lab # | Glass | | | | | | | Plastic | | | | | | Vials | | | | | | Jars | | | | General | | | | VOA Vials (>6mm) * | H2SO4 pH ≤2 | NaOH+Zn Act pH ≥9 | NaOH pH ≥12 | HNO3 pH ≤2 | pH after adjusted | Volume (mL) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | AG1U | BG1U | AG1H | AG4S | AG5U | AG2S | BG3U | BP1U | BP3U | BP3B | BP3N | BP3S | BP2Z | VG9C | DG9T | VG9U | VG9H | VG9M | VG9D | JGFU | JG9U | WGFU | WPFU | SP5T | ZPLC | GN 1 | GN 2 | | | | | | | |
| 001 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 002 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 003 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 004 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 005 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 006 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 007 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 008 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 009 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 010 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 011 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 012 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 013 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 014 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 015 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 016 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 018 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |
| 020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2.5 / 5 |

11/20/24 NK

Exceptions to preservation check: VOA, Coliform, TOC, TOX, TOH, O&G, WI DRO, Phenolics, Other:

Headspace in VOA Vials (>6mm) : ☐Yes ☐No ☒N/A *If yes look in headspace column

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| AG1U | 1 liter amber glass | BP1U | 1 liter plastic unpres | VG9C | 40 mL clear ascorbic w/ HCl | JGFU | 4 oz amber jar unpres |
| BG1U | 1 liter clear glass | BP3U | 250 mL plastic unpres | DG9T | 40 mL amber Na Thio | JG9U | 9 oz amber jar unpres |
| AG1H | 1 liter amber glass HCL | BP3B | 250 mL plastic NaOH | VG9U | 40 mL clear vial unpres | WGFU | 4 oz clear jar unpres |
| AG4S | 125 mL amber glass H2SO4 | BP3N | 250 mL plastic HNO3 | VG9H | 40 mL clear vial HCL | WPFU | 4 oz plastic jar unpres |
| AG5U | 100 mL amber glass unpres | BP3S | 250 mL plastic H2SO4 | VG9M | 40 mL clear vial MeOH | SP5T | 120 mL plastic Na Thiosulfate |
| AG2S | 500 mL amber glass H2SO4 | BP2Z | 500 mL plastic NaOH + Zn | VG9D | 40 mL clear vial DI | ZPLC | ziploc bag |
| BG3U | 250 mL clear glass unpres | | | | | GN 1 | |
| | | | | | | GN 2 | |

Page 1 of 2

DC#_Title: ENV-FRM-GBAY-0014 v03_SCUR
Effective Date: 8/17/2022

# Sample Condition Upon Receipt Form (SCUR)

Project #:

WO#: 40287754

40287754

**Client Name:** Ramboll

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

**Tracking #:** _____

**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 - 138 **Type of Ice:** (Wet) Blue Dry None ☐ Meltwater Only

**Cooler Temperature** Uncorr: 2.5 /Corr: 2.5

**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: 11/20/24 /Initials: NK

**Labeled By Initials:** VN

| | | |
|---|---|---|
| Chain of Custody Present: | ☒Yes ☐No ☐N/A | 1. |
| Chain of Custody Filled Out: | ☐Yes ☒No ☐N/A | 2. pg. # 11/20/24 NK |
| Chain of Custody Relinquished: | ☒Yes ☐No ☐N/A | 3. |
| Sampler Name & Signature on COC: | ☒Yes ☐No ☐N/A | 4. |
| Samples Arrived within Hold Time: | ☒Yes ☐No | 5. |
| - DI VOA Samples frozen upon receipt | ☐Yes ☐No | Date/Time: |
| **Short Hold Time Analysis (<72hr):** | ☐Yes ☒No | 6. |
| **Rush Turn Around Time Requested:** | ☒Yes ☐No | 7. 2 day TAT 11/20/24 NK |
| Sufficient Volume: For Analysis: ☒Yes ☐No MS/MSD: ☐Yes ☒No ☐N/A | | 8. |
| Correct Containers Used: | ☒Yes ☐No | 9. |
| Correct Type: ~~Pace Green Bay~~, Pace IR, Non-Pace | | |
| Containers Intact: | ☒Yes ☐No | 10. |
| Filtered volume received for Dissolved tests | ☐Yes ☐No ☒N/A | 11. |
| Sample Labels match COC: | ☒Yes ☐No ☐N/A | 12. |
| -Includes date/time/ID/Analysis Matrix: S | | |
| Trip Blank Present: | ☐Yes ☐No ☒N/A | 13. |
| Trip Blank Custody Seals Present | ☐Yes ☐No ☒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 logi**

Page 2 of 2