FINAL REPORT

For Industrial Hygiene Monitoring During VirkonTM Use and Mixing at the Peshtigo Service Center

WISCONSIN DEPARTMENT OF NATURAL RESOURCES

Ms. M. Present, Safety Manager

June 13, 2014

Project No. 193700658





June 12, 2014

Ms. Marsha Present DNR Safety Manager Wisconsin Department of Natural Resources 101 N Ogden Road, Suite A Peshtigo, WI 54157

RE: Final Report – Industrial Hygiene Monitoring During Virkon Mixing, Wisconsin DNR, Peshtigo, WI Stantec Project Number: 193700658

Dear Ms. Present:

Wisconsin Department of Natural Resources (WDNR) retained Stantec Consulting Services Inc. (Stantec) to perform employee breathing zone air monitoring during Dupont Virkon[™] Aquatic (Virkon) mixing at the facility located at 101 Ogden Road, in Peshtigo, WI (the Facility). The site contact was Ms. Marsha Present, WDNR Safety Manager, and the monitoring was conducted on May 28, 2014 by Stantec's Senior Scientist, Mr. Rick Pager.

The intent of the air monitoring was to evaluate compliance with the Wisconsin Department of Safety and Professional Services (SPS) permissible exposure limits (PELs), as adopted from the federal Occupational Safety and Health Administration (OSHA), as well as the American Conference of Governmental Industrial Hygienists' (ACGIH) advisory threshold limit values (TLVs) established for the specific agents, as well as recommending control measures, including personal protective equipment, based on the results.

SUMMARY AND FINDINGS

The results for Sulfamic Acid (measured as total dust as the marker or surrogate) and Potassium Peroxymonosulfate (measured as Potassium as the surrogate) showed concentrations below the analytical limits for both compounds. Thus, no remedial or corrective actions are required for the inhalation potential. However, it was noted that the employees wore no special eye protection while mixing the Virkon. Based on the significant eye and face hazard that this agent poses in the concentrated state, it should be considered mandatory that safety glasses and either a full faceshield or chemical goggles be worn whenever handling this product in an open container, along with nitrile gloves. Additionally, an emergency eyewash should be readily available during mixing activities, and when using this product.

SAMPLING STRATEGY

Both the sulfamic acid and potassium samples were collected utilizing Sensidyne GilAir5 personal sampling pumps and drawing air through a 37 mm, match-weighed, mixed cellulose ester (MCE) filters enclosed in a three-piece polycarbonate cassette at a rate of

RE: Final Report –Industrial Hygiene Monitoring During Virkon Mixing, Wisconsin DNR Peshtigo, WI

approximately 2.0 liters per minute. The pumps were calibrated prior to and after sampling utilizing a BIOS Defender 510-M primary flow calibrator.

The air samples were sent to, and analyzed, by Galson Laboratories, East Syracuse, New York, which is certified by the American Industrial Hygiene Association (AIHA). National Institute of Occupational Safety and Health (NIOSH) Methods were utilized for analysis including field blanks.

DISCUSSION

The DNR utilizes the Virkon as a disinfectant on boats and equipment after they have been removed from a waterway. The product is also used as a boot wash at State fish hatcheries to disinfect shoes prior to entering operational areas. The Virkon product is a powder, packaged in a plastic-lined tub, and mixed with water prior to use. The powder is mixed at a concentration of approximately a 100 milliters (ml) per gallon of water for disinfection of a boat, and at 200 ml/gallon as a boot wash in the fish hatcheries.

In regard to the mixing activities, Mr. Ron Rhode, wearing a rain jacket and nitrile gloves, used a small scoop to fill a measuring cup to the proper volume of product. The measured powder was poured into a sprayer, water was added, and then the sprayer was pressurized by hand pumping. As a second operation, Mr. Rhode used the scoop to fill the measuring cup to the proper level, poured the powder into a tub, and added water to the tub to the proper level, and sloshed the tub back and forth to mix the product to simulate the operations at the hatcheries.

Mr. Brad Ryan, wearing waders, rain jacket and nitrile gloves used the measuring cup to scoop the appropriate volume of product, poured it into the sprayer, and added water. The sprayer was pressurized and a boat was sprayed over the entire exterior and interior. The spraying operation did not saturate the boat as to cause runoff from the spraying. Mr. Ryan then placed a set of waders on the boat and sprayed them to simulate the disinfection process.

It was stated that once a solution of Virkon is mixed, it stays in the sprayer and is used until it is consumed. Then a new batch is mixed for use. The spraying may occur at a boat launch if the boat will be taken to another water body. As an alternative, the boat can be brought back to the Facility for disinfection.

CONCLUSIONS & RECOMMENDATIONS

Based on the test results, the conditions on the day of the testing, and on the authorized scope of this project, the following recommendations and conclusions are provided for DNR's consideration:

• It is concluded that the airborne concentrations of Virkon are minimal and well below any applicable regulatory limits;

Ms. M. Present, WDNR, Peshtigo June 12, 2014 Page 3

RE: Final Report –Industrial Hygiene Monitoring During Virkon Mixing, Wisconsin DNR Peshtigo, WI

- It is recommended that the employees always wear nitrile gloves, chemical splash goggles and/or face shield while mixing the Virkon product, and that an emergency eyewash is readily available in the immediate area of use; and
- It is recommended that the monitoring results from this survey be shared with the respective employees.

Stantec appreciates the opportunity to provide these services to the Wisconsin DNR. Please feel free to contact me at 262-643-9156 or Dan Feldt at 262-643-9176 if you have any questions.

Sincerely,

STANTEC CONSULTING SERVICES INC.

Richard Page1

Richard Pager Sr. Scientist

. G. -

Daniel G. Feldt, MPH, CIH Senior Industrial Hygienist

Attachments Table 1 – Air Monitoring Results Galson Laboratory Results

LIMITATIONS

The contents of this report reflect conditions and controls that Stantec was retained specifically to identify with at the time of the survey only, and may not reflect all conditions or potential exposures at this facility with regard to occupational safety and industrial hygiene. Stantec completed this industrial hygiene study in accordance with the degree of care and technical skill appropriately exercised by professionals currently practicing in this area. Conclusions contained in this report represent professional judgment and are based upon available information and technically accepted industrial hygiene and environmental health practices at the present time and location. Other than this, no warranty is implied or expressed.

Table 1Air Monitoring Results

Wisconsin Department of Natural Resources

101 N Ogden Road, Suite A

Peshtigo, WI 54157

May 28, 2014

SAMPLE				DURATION	ANALYTICAL	8 HR.	WDSPS	ACGIH
#/ID	NAME*	Activity	CHEMICAL	(MINS.)	RESULTS	TWA	PEL	TLV
D 101	Brad Ryan	mixing /disinfection	Sulfamic Acid (as total dust) Potassium	480***	<0.42 mg/m³	<0.001 mg/m³	15 mg/m³	10 mg/m³
			Peroxymonosulfate (as Potassium)		<0.031 mg/m³	<0.0008 mg/m³	ND	0.1^ mg/m³
D 102	Ron Rhode	mixing	Sulfamic Acid (as total dust) Potassium	480***	<0.42 mg/m³	<0.0096 mg/m³	15 mg/m³	10 mg/m³
			Peroxymonosulfate (as Potassium)		<0.031 mg/m³	<0.0007 mg/m³	ND	0.1^ mg/m³
D 105	Field Blank		Sulfamic acid (as total dust) Potassium		<0.20 mg			
			Peroxymonosulfate (as Potassium)		<15 ug			
Analytic	al Labororatory:	Galson Laboratory - Ea	st Syracuse, New York. AIHA Cert	ified				
Analytic	al Methods:	Total Dust mod. NIOSH	0500, Gravimetric; Potassium moc	d. NIOSH 7300	/mod. OSHA ID-1250	G, IPC/I		
Sampling Equipment: Sensidyne GilAir 5 San		Impling Pumps; BIOS Defender Primary Standard Calibrator						
WDSPS: Wisconsin Department		nt of Safety and Professional Services						
ACGIH: American Conference of Governmental Indu		of Governmental Industrial Hygie	nists					
	PEL: Permissible exposure limit/8 hr. time-weigh							
		Permissible exposure lin	nit/8 hr. time-weighted average					
			nit/8 hr. time-weighted average Value/8 hr. time-weighted averag	je				

Table 1 Air Monitoring Results

Wisconsin Department of Natural Resources 101 N Ogden Road, Suite A Peshtigo, WI 54157 May 28, 2014

*.	Employees and areas selected by WDNR
<:	Less Than. The analyte was detected but at a level too low to be accurately quantitated by the method used.
	The actual amount is less than the reported value.
ND	None Determined
٨	as Persulfate
***	Actual Sample time for B Ryan was 13 minutes, for R Rhode was 11 minutes



June 05, 2014

DOH ELAP #11626 AIHA-LAP #100324

Account# 21621

Login# L319759

Dear Ms. Garza:

Ms. Sherry Garza

Parker Services Inc 1800 North Point Drive Stevens Point, WI 54481

Enclosed are the analytical results for the samples received by our laboratory on May 29, 2014. All test results meet the quality control requirements of AIHA-LAP and NELAC unless otherwise stated in this report. All samples on the chain of custody were received in good condition unless otherwise noted.

Results in this report are based on the sampling data provided by the client and refer only to the samples as they were received at the laboratory. Unless otherwise requested, all samples will be discarded 14 days from the date of this report, with the exception of IOMs, which will be cleaned and disposed of after seven calendar days.

Current Scopes of Accreditation can be viewed at www.galsonlabs.com in the accreditations section under the "about Galson" tab.

Please contact Patty Gregorich at (888)-432-5227, if you would like any additional information regarding this report.

Thank you for using Galson Laboratories.

Sincerely,

Galson Laboratories

Mary & Unangst

Mary G. Unangst Laboratory Director

Enclosure(s)



LABORATORY ANALYSIS REPORT

	Client	: Parker Services, Inc	
6601 Kirkville Road	Site	: DNR Peshtigo	
East Syracuse, NY 13057	Project No.	: 19370658 Virkon Samplin	la
(315) 432-5227			
FAX: (315) 437-0571	Date Sampled	: 28-MAY-14	Account No.: 21621
www.galsonlabs.com	Date Received	: 29-MAY-14	Login No. : L319759
	Date Analyzed	: 02-JUN-14	
	Report ID	: 834684	

Client ID : D 101 Date Sampled : 05/28/14		: L319759-1 nalyzed : 06/02/1	Air Volume : 4	480 Liter
<u>Parameter</u>	LOQ uq	Total uq	Conc	Units
Potassium	15.	<15	<0.031	mg/m3

<u>COMMENTS:</u> Please see attached lab footnote report for any applicable footnotes.

Collection Med.	ia : Filter	Approved 1 Date : 03	by: mlh/kml by : keg -JUN-14 NYS DOH # : 11626 by: Tony D'Amico
< -Less Than	mg -Milligrams	m3 -Cubic Meters	kg -Kilograms
> -Greater Than	ug -Micrograms	l -Liters	NS -Not Specified
NA -Not Applicable	ND -Not Detected	ppm -Parts per Million	LOQ-Limit of Quantitation



	Client	: Parker Services, Inc	
6601 Kirkville Road	Site	: DNR Peshtigo	
East Syracuse, NY 13057 (315) 432-5227	Project No.	: 19370658 Virkon Samplir	ıg
FAX: (315) 437-0571	Date Sampled	: 28-MAY-14	Account No.: 21621
www.galsonlabs.com	Date Received	: 29-MAY-14	Login No. : L319759
	Date Analyzed	: 02-JUN-14	
	Report ID	: 834684	

Client ID : D 102 Lab ID : L319759-2 Air Volume : 480 Liter Date Sampled : 05/28/14 Date Analyzed : 06/02/14

Parameter	LOQ uq	Total uq	Conc	Units
Potassium	15.	<15	<0.031	mg/m3

<u>COMMENTS:</u> Please see attached lab footnote report for any applicable footnotes.

Collection Med	ia : Filter	Approved 1 Date : 03	by: mlh/kml by : keg -JUN-14 NYS DOH # : 11626 by: Tony D'Amico
< -Less Than > -Greater Than NA -Not Applicable	mg -Milligrams ug -Micrograms ND -Not Detected	m3 -Cubic Meters l -Liters ppm -Parts per Million	kg -Kilograms NS -Not Specified LOQ-Limit of Quantitation
Field sampling was not	performed by Galson	Galson presents results	based on sampling data



	Client	: Parker Services, Inc	
6601 Kirkville Road	Site	: DNR Peshtigo	
East Syracuse, NY 13057	Project No.	: 19370658 Virkon Samplin	g
(315) 432-5227			
FAX: (315) 437-0571	Date Sampled	: 28-MAY-14	Account No.: 21621
www.galsonlabs.com	Date Received	: 29-MAY-14	Login No. : L319759
	Date Analyzed	: 02-JUN-14	
	Report ID	: 834684	

Client ID : D 105Lab ID : L319759-3Air Volume : NADate Sampled : 05/28/14Date Analyzed : 06/02/14

Parameter	LOQ uq	Total uq	Conc	Units
Potassium	15.	<15	NA	mg/m3

<u>COMMENTS:</u> Please see attached lab footnote report for any applicable footnotes.

Collection Med	ia : Filter	Approved : Date : 03	by: mlh/kml by : keg -JUN-14 NYS DOH # : 11626 by: Tony D'Amico
 -Less Than -Greater Than NA -Not Applicable 	mg -Milligrams ug -Micrograms ND -Not Detected	m3 -Cubic Meters l -Liters ppm -Parts per Million	kg -Kilograms NS -Not Specified LOQ-Limit of Quantitation
Field sampling was not	performed by Galson.	Galson presents results	based on sampling data



LABORATORY ANALYSIS REPORT

	Client	: Parker Services, Inc	
6601 Kirkville Road	Site	: DNR Peshtigo	
East Syracuse, NY 13057	Project No.	: 19370658 Virkon Samplin	ıg
(315) 432-5227			
FAX: (315) 437-0571	Date Sampled	: 28-MAY-14	Account No.: 21621
www.galsonlabs.com	Date Received	: 29-MAY-14	Login No. : L319759
	Date Analyzed	: 30-MAY-14	
	Report ID	: 834005	

Client ID : D 101 Date Sampled : 05/28/14		ID : L319759-1 Air Volume : 480 Lite Analyzed : 05/30/14		
Parameter	LOQ mg	Total mg	Conc mg/m3	
Total Dust	0.20	<0.20	<0.42	

<u>COMMENTS:</u> Please see attached lab footnote report for any applicable footnotes.

Collection Med	ia : Filter		-
< -Less Than	mg -Milligrams	m3 -Cubic Meters	kg -Kilograms
> -Greater Than	ug -Micrograms	l -Liters	NS -Not Specified
NA -Not Applicable	ND -Not Detected	ppm -Parts per Million	LOQ-Limit of Quantitation



	Client	: Parker Services, Inc	
6601 Kirkville Road	Site	: DNR Peshtigo	
East Syracuse, NY 13057	Project No.	: 19370658 Virkon Sampling	g
(315) 432-5227			
FAX: (315) 437-0571	Date Sampled		Account No.: 21621
www.galsonlabs.com	Date Received	: 29-MAY-14	Login No. : L319759
	Date Analyzed	: 30-MAY-14	
	Report ID	: 834005	

Client ID : D 102 Lab ID : L319759-2 Air Volume : 480 Liter Date Sampled : 05/28/14 Date Analyzed : 05/30/14

<u>Parameter</u>	LOQ	Total	Conc
	mq	mg	mg/m3
Total Dust	0.20	<0.20	<0.42

<u>COMMENTS:</u> Please see attached lab footnote report for any applicable footnotes.

Collection Med	ia : Filter		-
< -Less Than > -Greater Than NA -Not Applicable	mg -Milligrams ug -Micrograms ND -Not Detected	m3 -Cubic Meters l -Liters ppm -Parts per Million	kg -Kilograms NS -Not Specified LOQ-Limit of Quantitation
Field sampling was not	performed by Galson	Galson presents results	based on sampling data



	Client	: Parker Services, Inc	
6601 Kirkville Road	Site	: DNR Peshtigo	
East Syracuse, NY 13057 (315) 432-5227	Project No.	: 19370658 Virkon Samplin	g
FAX: (315) 437-0571	Date Sampled	: 28-MAY-14	Account No.: 21621
www.galsonlabs.com	Date Received	: 29-MAY-14	Login No. : L319759
	Date Analyzed	: 30-MAY-14	
	Report ID	: 834005	

Client ID : D 105Lab ID : L319759-3Air Volume : NADate Sampled : 05/28/14Date Analyzed : 05/30/14

Parameter	LOQ	Total	Conc
	mg	mg	mg/m3
Total Dust	0.20	<0.20	NA

<u>COMMENTS:</u> Please see attached lab footnote report for any applicable footnotes.

Collection Med	ia : Filter		-
< -Less Than > -Greater Than NA -Not Applicable	mg -Milligrams ug -Micrograms ND -Not Detected	m3 -Cubic Meters l -Liters ppm -Parts per Million	kg -Kilograms NS -Not Specified LOQ-Limit of Quantitation
Field sampling was not	performed by Galson	Galson presents results	based on sampling data



LABORATORY FOOTNOTE REPORT

6601 Kirkville Road	Site	: Parker Services, Inc : DNR Peshtigo : 19370658 Virkon Samplin	ıg
East Syracuse, NY 13057 (315) 432-5227 FAX: (315) 437-0571 www.galsonlabs.com	Date Sampled Date Received Date Analyzed		Account No.: 21621 Login No. : L319759

Unless otherwise noted below, all quality control results associated with the samples were within established control limits or did not impact reported results.

Unrounded results are carried through the calculations that yield the final result and the final result is rounded to the number of significant figures appropriate to the accuracy of the analytical method. Please note that results appearing in the columns preceeding the final result column may have been rounded in order to fit the report format and therefore, if carried through the calculations, may not yield an identical final result to the one reported.

The stated LOQs for each analyte represent the demonstrated LOQ concentrations prior to correction for desorption efficiency (if applicable).

Unless otherwise noted below, reported results have not been blank corrected for any field blank or method blank.

L319759 (Report ID: 834684):

Reported results reflect elemental analysis of the requested metals. Certain compounds may not be solubilized during digestion, resulting in data that is biased low. SOPs: MT-SOP-9(25), im-mwvfilt(20)

Accuracy and mean recovery data presented below is based on a 95% confidence interval (k=2). The estimated uncertainty applies to the media, technology, and SOP referenced in this report and does not account for the uncertainty associated with the sampling process.

Parameter	Accuracy	Mean Recovery	
Potassium	+/-7.3%	97.9%	
Parameter	Method		PEL
Potassium	mod. NIOSH 7300/m	od. OSHA ID-125G; ICP/I	NA

L319759 (Report ID: 834005):

PNOR = Particulates Not Otherwise Regulated.

SOPs: GRAV-SOP-7(4)

Dust analytical accuracy is within +/- 0.036 mg (95% confidence interval or k=2). The estimated uncertainty applies to the media, technology, and SOP(s) referenced in this report and does not account for any uncertainty associated with the sampling process.

Parameter Method		PEL
Total Dust	mod. NIOSH 0500; Gravimetric	PNOR 15 mg/m3 (TWA)

|--|--|--|

	□ New Client?	l? Report To*		Mr Rick Pager	ader Invoice To*	Mr Dan Feldt	-aldt
				Stantec Consulting		Stante	sulting
LABORATORIES	Client Account No.*:	t No.*	12075	12075 Corporate Parkway	Parkway #200	12075 Corporate Parkway #200	arkway #200
801531429284 Date:05/29/14	21621			Mequon, WI 53092		Mequon, WI 53092	53092
Shipper:FEDEX To:+ isle:)me		Phone No.*:		1-262-241-4466	-4466 Phone No.	1-262-241-4466	-4466
		Cell No.		21.00	Email	dan.feldt@stantec.com	ntec.com
Prep: PSY298468	Email Resu	Email Results To : Mr. Dan Feld	eldt	- 9	Purchase	se Order No. :	
	Email Ad	Email Address : richard.pager@stantec.com	ger@stantec.	com	Credit Card	Credit Card on File	Call for Credit Card Info
weed results by (surcharge)		Samples submitted using the	he FreePumpLoa	FreePumpLoanTM Program.	Samples submit	Samples submitted using the FreeSamplingBadgesTM Program.	esTM Program.
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O 2 Business Days 75%	2	•	•				
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ŝ					WI MSHA	Other (specify)	
Sample Identification* Maximum of 20 characters, IDs longer than 20 characters will be abbreviated 1	Date Sampled*	Collection Medium	Sample Volume, Sample Time, or Sample Area*	Li ml, min., Li ml, min., in2 cm2 ft2	Analysis Requested*	Method Reference ^A	Process (ex. welding,
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For crystalline silica: form(s) of silica needed must be indicated (Quartz, Cristobalite, and/or Tridymite)*.	ilica needed must be	indicated (Quartz,	Cristobalite, a	and/or Tridym	lite)*:		
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