2018 Annual Groundwater Monitoring and Corrective Action Report

Weston Disposal Site No. 3 Landfill
Town of Knowlton, Wisconsin

Wisconsin Public Service Corporation

January 31, 2019



JANUARY 31, 2019 | PROJECT #71202

2018 Annual Groundwater Monitoring and Corrective Action Report

Weston Disposal Site No. 3 Landfill

Town of Knowlton, Wisconsin

Prepared for:

WEC Business Services, LLC 333 W. Everett Street Milwaukee, WI

> NATHANIEL R. KELLER Senior Hydrogeologist

GLENN R. LUKE, PE Managing Engineer

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ACRONYMS AND ABBREVIATIONS

ASD Alternate Source Demonstration

B Boron Ca Calcium

CCR Coal Combustion Residual
CFR Code of Federal Regulations

Cl Chloride

mg/L milligrams per liter

OBG O'Brien & Gere Engineers, Inc., part of Ramboll

SO₄ Sulfate

SSI Statistically Significant Increase

TBD To be Determined
TDS Total Dissolved Solids
WDS3 Weston Disposal Site No. 3

WPSC Wisconsin Public Service Corporation



1 INTRODUCTION

This report has been prepared on behalf of Wisconsin Public Service Corporation (WPSC) by O'Brien & Gere Engineers, Inc., part of Ramboll (OBG), to provide the information required by Title 40 of the Code of Federal Regulations (40 CFR) 257.90(e) for the Weston Disposal Site No. 3 (WDS3) Landfill located in the Town of Knowlton, Wisconsin.

In accordance with 40 CFR 257.90(e), the owner or operator of an existing coal combustion residual (CCR) unit must prepare an annual groundwater monitoring and corrective action report (Annual Report) for the preceding calendar year. The Annual Report must document the status of the groundwater monitoring and corrective action program for the CCR unit and summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year. At a minimum, the Annual Report must contain the following information, to the extent available:

- (1) A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;
- (2) Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;
- (3) In addition to all the monitoring data obtained under 40 CFR 257.90 through 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;
- (4) A narrative discussion of any transition between monitoring programs (*e.g.*, the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels); and
- (5) Other information required to be included in the annual report as specified in 40 CFR 257.90 through 257.98.1

This report provides the required information for the WDS3 Landfill for calendar year 2018.

¹ For calendar year 2018, corrective action and other information required to be included in the annual report as specified in 40 CFR 257.95 through 257.98 is not applicable.



2 MONITORING AND CORRECTIVE ACTION PROGRAM STATUS

The WDS3 Landfill remained in Detection Monitoring (40 CFR 257.94) during 2018. Detection Monitoring Program sampling dates and parameters collected are provided in Table 1. Analytical results from the two sampling rounds collected and those statistically analyzed in 2018 are included in Table 2.

In accordance with 40 CFR 257.93(h)(2), the *Statistical Analysis Plan, Weston Disposal Site No. 3 Landfill* (Natural Resource Technology, an OBG Company, 2017), and within 90 days of completing sampling and analysis (receipt of data); analytical data was evaluated for statistically significant increases (SSIs) over background concentrations for Appendix III constituents at monitoring wells at the WDS3 Landfill. SSIs and the SSI determination dates are provided in Table 1.

40 CFR 257.94(e)(2) allows 90 days to demonstrate that a SSI was caused by a source other than the CCR unit or resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality (i.e., an alternate source demonstration). An alternate source demonstration (ASD) was completed for the WDS3 Landfill on the date provided in Table 1. The ASD document is provided in Appendix A.

Table 1. Detection Monitoring Program Summary

Detection Monitoring Round	Sampling Date	Parameters Collected	Data Received	SSI Determination Date	SSI Parameters	Resample Date	ASD Date
1	10/11/2017	Appendix III	10/26/2017	1/15/2018	B, Ca, Cl, SO ₄ , TDS	NA	4/15/2018
2	4/26/2018	Appendix III	5/10/2018	8/8/2018	B, Ca, SO ₄ , TDS	NA	4/15/2018
3	10/25/2018	Appendix III	11/26/2018	TBD (before 2/24/2019)	TBD	TBD	TBD

B - Boron

Ca - Calcium

Cl - Chloride

NA - Not applicable

SO₄ – Sulfate

TBD - To Be Determined

TDS - Total Dissolved Solids

The WDS3 Landfill remains in the Detection Monitoring Program in accordance with 40 CFR 257.94.



3 KEY ACTIONS COMPLETED IN 2018

Two groundwater sampling events were completed in 2018 as part of the Detection Monitoring Program, Rounds 2 and 3. One groundwater sample was collected from each background and downgradient well in the monitoring system during each event. Sampling dates are summarized in Table 1. All samples were collected and analyzed in accordance with the *Sampling and Analysis Plan, Weston Disposal Site No. 3 Landfill* (Natural Resource Technology, an OBG Company, 2017). All monitoring data obtained under 40 CFR 257.90 through 257.98 (as applicable) in 2018 are presented in Table 2.

A map showing the groundwater monitoring system, including the CCR unit and all background (upgradient) and downgradient monitoring wells with well identification numbers, for the WDS3 Landfill is presented on Figure 1. There were no changes to the monitoring system in 2018.

Statistical evaluation, including SSI determinations, of analytical data from the Detection Monitoring Program for October 11, 2017 (Detection Monitoring Round 1) and April 26, 2018 (Detection Monitoring Round 2) were completed within 90 days of receipt of the analytical data. Statistical evaluation of analytical data is being performed in accordance with the *Statistical Analysis Plan, Weston Disposal Site No. 3 Landfill* (Natural Resource Technology, an OBG Company, 2017).

An ASD dated April 15, 2018 was prepared for the WDS3 Landfill in 2018 and is provided in Appendix A; the April 15, 2018 ASD is applicable to wells and parameters with SSIs during Detection Monitoring Rounds 1 and 2, as indicated in Table 1. The ASD was prepared in accordance with 40 CFR 257.94(e)(2) and provides a description, data, and pertinent information supporting an alternate source applicable to the wells and parameters with SSIs at the WDS3 Landfill. The ASD supports the position that the SSIs observed during the Detection Monitoring Program were not due to a release from the CCR unit but were either from anthropogenic impacts in the area of WDS3 Landfill or from naturally occurring conditions (e.g. natural variation in groundwater quality).



WESTON DISPOSAL SITE NO. 3 LANDFILL 2018 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT PROBLEMS ENCOUNTERED AND ACTIONS TO RESOLVE PROBLEMS

4 PROBLEMS ENCOUNTERED AND ACTIONS TO RESOLVE PROBLEMS

No problems were encountered during implementation of the Detection Monitoring Program during 2018. Groundwater samples were collected and analyzed in accordance with the *Sampling and Analysis Plan, Weston Disposal Site No. 3 Landfill* (Natural Resource Technology, an OBG Company, 2017), and all data was accepted.



5 KEY ACTIVITIES PLANNED FOR 2019

The following key activities are planned for 2019:

- Continuation of the Detection Monitoring Program with semi-annual sampling scheduled for the 2nd and 4th quarters of 2019.
- Complete statistical evaluation of analytical data from the downgradient wells, using background data to determine whether a SSI of Appendix III parameters over background concentrations has occurred.
- If an SSI is identified, potential alternate sources (*i.e.*, a source other than the CCR unit caused the SSI or that that SSI resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality) will be evaluated. If an alternate source is demonstrated to be the cause of the SSI, a written demonstration will be completed within 90 days of SSI determination and included in the annual groundwater monitoring and corrective action report for 2019.
 - » If an alternate source(s) is not identified to be the cause of the SSI, the applicable requirements of 40 CFR 257.94 through 257.98 (*e.g.*, assessment monitoring) will apply in 2019, including associated recordkeeping/notifications required by 40 CFR 257.105 through 257.108.



WESTON DISPOSAL SITE NO. 3 LANDFILL 2018 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT REFERENCES

REFERENCES

Natural Resource Technology, an OBG Company, 2017, Sampling and Analysis Plan, Weston Disposal Site No. 3 Landfill, Town of Knowlton, Wisconsin, October 3, 2017.

Natural Resource Technology, an OBG Company, 2017, Statistical Analysis Plan, Weston Disposal Site No. 3 Landfill, Town of Knowlton, Wisconsin, October 17, 2017.



Tables



Weston Disposal Site No. 3 Landfill
Table 2. Weston Disposal Site No. 3 Landfill: Appendix III Analytical Results

Date Range: 10/01/2017 to 10/25/2018								
Well Id	Date Sampled	Lab Id	B, tot, mg/L	Ca, tot, mg/L	Cl, tot, mg/L	F, tot, mg/L	pH (field), STD	SO4, tot, mg/L
I.C. 100	10/11/2017	401505(0000	0.0550	11,000	0.960	<0.100	(270	15 700
LS-100	10/11/2017 04/26/2018	40158568002 40168127002	0.0559 0.0292	11.000 6.550	0.860 0.720	<0.100 <0.100	6.270 6.970	15.700 13.100
	10/25/2018	AE31422	0.0292	11.000	0.720	0.100	6.300	17.000
LS-101	10/11/2017	40158568003	0.0230	11.400	0.760	< 0.100	5.750	5.900
LS-101								
	04/26/2018	40168127003	< 0.0067	4.180	0.540	< 0.100	6.450	4.100
	10/25/2018	AE31423	0.0140	3.000	0.400	0.061	6.100	3.100
LS-105	10/11/2017	40158568004	0.0452	18.800	3.600	< 0.500	7.240	31.000
	04/26/2018	40168127004	0.0161	18.700	2.600	< 0.500	7.430	15.900
	10/25/2018	AE31424	0.0300	20.000	0.740	0.085	6.500	16.000
LS-106	10/11/2017	40158568005	0.1060	15.500	3.600	< 0.500	6.580	11.400
	04/26/2018	40168127005	0.0544	6.160	< 2.500	< 0.500	7.510	< 5.000
	10/25/2018	AE31425	0.0540	6.000	0.470	0.066	6.400	3.200
LS-107	10/11/2017	40158568006	0.0143	26.000	6.200	< 0.100	6.130	25.500
	04/26/2018	40168127006	0.0097	20.100	3.000	< 0.100	6.850	17.500
	10/25/2018	AE31426	0.0170	21.000	2.700	0.065	6.000	26.000

Weston Disposal Site No. 3 Landfill Table 2. Weston Disposal Site No. 3 Landfill: Appendix III Analytical Results

Date Range:	Date Range: 10/01/2017 to 10/25/2018					
Well Id	Date Sampled	Lab Id	TDS, mg/L			
LS-100	10/11/2017	40158568002	80.000			
	04/26/2018	40168127002	82.000			
	10/25/2018	AE31422	50.000			
LS-101	10/11/2017	40158568003	62.000			
	04/26/2018	40168127003	58.000			
	10/25/2018	AE31423	44.000			
LS-105	10/11/2017	40158568004	100.000			
	04/26/2018	40168127004	118.000			
	10/25/2018	AE31424	110.000			
LS-106	10/11/2017	40158568005	108.000			
	04/26/2018	40168127005	88.000			
	10/25/2018	AE31425	58.000			
LS-107	10/11/2017	40158568006	134.000			
	04/26/2018	40168127006	128.000			
	10/25/2018	AE31426	120.000			

Figures





Appendix A

40 CFR 257.94(e)(2)
Alternate Source
Demonstration (ASD) –
April 15, 2018

OBG

Alternate Source Demonstration

Weston Disposal Site No. 3 Landfill Town of Knowlton, WI

Wisconsin Public Service Corporation

April 15, 2018



APRIL 15, 2018 | PROJECT #67985

Alternate Source Demonstration

Weston Disposal Site No. 3 Landfill Town of Knowlton, Wisconsin

Prepared for:

WEC Business Services, LLC 333 W. Everett Street Milwaukee, WI

> GLENN R. LUKE, PE Managing Engineer

NATHANIEL R. KELLER, PG Senior Hydrogeologist

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Attachment C Construction Documentation Report Appendix C – Phase I Closure Report

ACRONYMS AND ABBREVIATIONS

msl

ASD alternate source demonstration CCR **Coal Combustion Residuals CFR Code of Federal Regulations HDPE** high density polyethylene mg/L milligrams per liter mean sea level

NRT Natural Resource Technology, an OBG Company

OBG O'Brien & Gere Engineers, Inc. SSI statistically significant increase

STD standard units

TDS Total dissolved solids

WAC Wisconsin Administrative Code

WDNR Wisconsin Department of Natural Resources

WDS3 Weston Disposal Site No. 3

1 INTRODUCTION

1.1 OVERVIEW

This document has been prepared on behalf of Wisconsin Public Service Corporation (WPSC) by O'Brien & Gere Engineers, Inc. (OBG) to provide pertinent information for an alternate source demonstration (ASD) as allowed by 40 CFR § 257.94(e)(2) for the Weston Disposal Site No. 3 (WDS3) Landfill located in the Town of Knowlton, Wisconsin.

Initial background groundwater monitoring consisting of a minimum of eight samples as required under 40 CFR § 257.94(b) was initiated in February 2016 and completed prior to October 17, 2017. The first semi-annual detection monitoring sample was collected on October 12, 2017 for which analytical data was received on October 25, 2017. Statistical analysis of the first detection monitoring sample for statistically significant increases (SSIs) of 40 CFR Part 257 Subpart D (CCR Rule) Appendix III parameters over background concentrations was completed within 90 days of collection of the sample (January 15, 2018). The determination identified the following SSIs at downgradient monitoring wells:

- Boron above the background prediction interval at wells LS-100, LS-105, and LS-106
- Calcium above the background prediction interval at wells LS-100, LS-105, LS-106, and LS-107
- Chloride above the background prediction interval at well LS-107
- Sulfate above the background prediction interval at wells LS-100, LS-105, and LS-107
- Total dissolved solids (TDS) above the background prediction interval at wells LS-105, LS-106, and LS-107

40 CFR § 257.94(e)(2) allows the owner or operator 90 days from the date of determination to demonstrate that a source other than the coal combustion residual (CCR) unit caused the SSI, or that the apparent SSI was from a source other than the CCR unit, or that the SSI resulted from errors in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. Pursuant to 40 CFR § 257.94(e)(2), the following demonstrates that sources other than the recently reconstructed landfill were the cause of the SSIs listed above. This ASD was completed within 90 days of determination of the SSIs (April 15, 2018) as required by 40 CFR § 257.94(e)(2).

1.2 BACKGROUND

The WDS3 Landfill is located in the E 1/2 of the NW 1/4 and W 1/2 of the NE 1/4, Section 23, Township 26 North, Range 7 East, Town of Knowlton, Marathon County, Wisconsin. The landfill was originally permitted by the Wisconsin Department of Natural Resources (WDNR) on October 20, 1986, with the issuance of a Conditional Plan of Operation Approval. The original facility was licensed and approved to consist of 8 cells covering 35 acres and having a total design capacity of 873,000 cubic yards. Former Cell 1 was constructed and placed into operation with the construction documentation approval on December 18, 1990.

However, due to WPSC's beneficial use program, the former cell was only partially filled, temporarily capped, and remained dormant. In 2011, WPSC began a permitting effort to expand the WDS3 landfill from 35 acres and 873,000 cubic yards to 57.6 acre and 4,075,500 cubic yards. The new expanded landfill was permitted December 11, 2014, with the issuance of a Conditional Plan of Operation Approval by WDNR.

As part of that permitting effort the geologic and hydrogeologic investigation program defined the geologic conditions, groundwater quality, and groundwater flow regimes for the site. All of the information for permitting of the reconfigured landfill is included in the report titled; *Feasibility Report, Proposed Weston Disposal Site No. 3 Expansion* (AECOM, 2012). Table 1 summarizes the location and applicable elevations of the CCR groundwater monitoring wells. Figure 1 shows the location of all existing groundwater monitoring wells.

WDS3 ASD FINAL 180415.docx

Cells 1 and 2 of the existing landfill were constructed during the 2015 construction season, with completion of the new landfill cells and installation of a new leachate force main, storage tank, and load-out system in late December 2015. The construction of Cells 1 and 2 of the new landfill included the removal and off-site disposal of all CCR from the former Cell 1 at a licensed municipal solid waste landfill (TRC, 2016).

1.3 GROUNDWATER MONITORING

Background groundwater sampling in compliance with the CCR Rule was initiated in February 2016, with the final round of background groundwater samples collected in October 2017 Groundwater is also sampled to meet the requirements of a WDNR program and groundwater samples have been collected on other portions of the site since the late 1980's. The CCR Rule monitoring program includes background well LS-101, and downgradient wells LS-100, and LS-105 to LS-107. A map showing the groundwater monitoring system, including the WDNR program and CCR Rule monitoring wells, is presented on Figure 1. Groundwater generally flows both southeast and northwest from a bedrock high that trends southwest to northeast (Figure 2 and 3).

All monitoring data obtained under 40 CFR § 257.90 through 257.98 (as applicable) are presented in Table 2. Statistical evaluation of analytical data was performed in accordance with the Statistical Analysis Plan, Weston Disposal Site No. 3, Wisconsin Public Service (Natural Resource Technology, an OBG Company, 2017b).

1.4 GEOLOGY

Based on the AECOM investigation and previous geologic investigations at the site, the geology at the landfill property is characterized as a thin layer of glacial till and weathered bedrock overlying a shallow, variable granitic bedrock surface that has been previously influenced by glaciation. The underlying bedrock is an igneous Precambrian granite, quartz diorite, and/or amphibole. The unconsolidated sediments are generally between 0.5 and 20.0 feet thick, consisting of a relatively thin and discontinuous unit of glacial till and weathered bedrock identified as the Marathon Formation (undifferentiated). The weathered bedrock layer was derived from the parent bedrock material, via erosion and/or by glacial processes, which also leaves behind glacially transported material. Typically, it is difficult to differentiate the till from the weathered bedrock. The Marathon Formation (undifferentiated) tends to exhibit some degree of sorting, with no relict textures of the parent bedrock.

The weathered bedrock gradually transitions from the overlying Marathon Formation (undifferentiated) or more sharply from the thin overlying topsoil. The weathered bedrock is predominately a silty sand (SM) derived from the bedrock directly beneath it. Fragments of gravel to cobble-sized competent pieces of the parent rock are found in-place throughout this silty sand. Relics of the parent material can be observed. The contact with the underlying competent bedrock is generally abrupt. The 2012 AECOM geologic investigation encountered three rock types: quartz diorite, amphibolite, and granite.

Borings completed for both prior work at the site and the 2012 AECOM investigation indicate there is a bedrock high on the west side of the landfill site near LS-16 OW at an elevation of approximately 1,200 feet mean sea level (msl). The bedrock surface slopes radially away from this area. A smaller bedrock high exists southwest of well LS-101 in the northeast corner of the site at approximately the same elevation; this high is located beneath the northwest corner of the newly constructed Cell 1.

Details of geology near WDS3 Landfill are found on the cross-sections provided in Attachment A (Sheets FR-15, FR-17, FR-24, Sheet 19 of 29).

The landfill site is located along a regional bedrock high between Johnson Creek, 0.6 mile to the east and Peplin Creek, 1.25 miles west. It is an area of groundwater recharge, with groundwater flow moving radially from the bedrock high located on the west side of the site.

Groundwater flow mimics the surface topography and the bedrock surface, with a groundwater mound roughly centered near well LS-16 OW, and groundwater flowing generally to the northwest, southwest, and southeast away from the bedrock high and off the site. This is also observed at the smaller bedrock high near LS-101, with groundwater flowing generally to the southeast and northwest. Measured water elevations along the bedrock highs can be four or more feet higher than lower elevation bedrock (and topographic) areas, reflecting areas of

WESTON DISPOSAL SITE NO. 3 LANDFILL 40 CFR § 257.94(E)(2): ALTERNATE SOURCE DEMONSTRATION

recharge proximate to the west-central part of the WDS3 Landfill (future Cells 7-9) and the northern portion of Cell 1.

There is an observed southwest to northeast trending groundwater divide, with components of groundwater flow to the north and south. The groundwater divide has implications for the design of a groundwater monitoring network compliant with the CCR Rule. Most of Cell 1, all of Cells 2 and future Cell 3, and the southern portions of future Cells 4 and 5 are predominantly east and south of the groundwater flow divide, so monitoring wells southeast of Cells 1-2 and future Cells 3-5 are downgradient. For the west half of the property and future Cells 6-9 the groundwater flow is south to southwest and northwest to northeast.

Based on field testing for the AECOM 2012 Feasibility Report, the unconsolidated glacial till deposit was reported to have a saturated hydraulic conductivity of 1.1E-04 centimeters per second (cm/s). Hydraulic conductivities for the granitic bedrock were lower, ranging from approximately 2.1E-05 to 9.0E-07 cm/s.

2 ALTERNATE SOURCE DEMONSTRATION

2.1 SUMMARY

Statistical analysis of the first detection monitoring sample for SSIs of 40 CFR Part 257 Appendix III parameters over background concentrations identified the following SSIs at downgradient monitoring wells:

- Boron above the background prediction interval at wells LS-100, LS-105, and LS-106
- Calcium above the background prediction interval at wells LS-100, LS-105, LS-106, and LS-107
- Chloride above the background prediction interval at well LS-107
- Sulfate above the background prediction interval at wells LS-100, LS-105, and LS-107
- Total dissolved solids above the background prediction interval at wells LS-105, LS-106, and LS-107

As allowed by 40 CFR § 257.94(e)(2), this ASD demonstrates that sources other than the WDS3 Landfill caused the SSI or that the apparent SSI was a result of natural variation in groundwater quality. Lines of evidence supporting this ASD include the following:

- Existing Groundwater Concentrations: From about 1990 to 2015 a prior CCR landfill was present onsite, occupying a footprint adjacent to and west of the current landfill extent. In 2015 the former landfill including all existing CCR material was removed and hauled to a municipal solid waste facility. The closure of the former landfill and construction of the existing WDS3 Landfill Cells 1 and 2 was approved by the WDNR on April 22, 2016 (Attachment B). Construction was completed in late 2015 and CCR was placed in Cell 2 beginning on June 27, 2016. Concentrations of some CCR indicator parameters in groundwater, prior to placement of CCR in the new landfill, were similar to those detected during both the background and first detection monitoring events for WDS3 Landfill. Existing Cell 1 is complete but does not contain CCR at this time.
- Landfill Design: The former Cell 1 (now removed) was constructed in the late 1980's with a 5-foot clay liner with leachate collection; a revised design was approved in 2015 during an expansion request. The current CCR unit (WDS3 Landfill) was constructed with a composite 60-mil high density polyethylene (HDPE) and geosynthetic clay liner with leachate collection system and groundwater gradient control system.
- Variability of Uppermost Aquifer and Groundwater Geochemistry: The geology of the site and uppermost aquifer composition are variable based on the elevation of the underlying granitic bedrock. The upgradient well, LS-101 is screened almost entirely in the bedrock, while downgradient well LS-106 is screened in unlithified materials overlying the bedrock. The composition of the aquifer (bedrock, weathered bedrock, and unlithified materials) controls the naturally occurring inorganic constituents and groundwater geochemistry.
- Changes in Geochemical Conditions from Landfill Construction: During removal of the old landfill and construction of the existing WDS3 Landfill, the ground surface was disturbed and non-native materials (clay, general fill) were placed to construct the new landfill. Groundwater and precipitation interactions with the new materials above and within the uppermost aquifer, likely resulted in both release of inorganic compounds into the groundwater and geochemical changes impacting downgradient groundwater quality. Groundwater recharge along the bedrock surface, with general groundwater flow direction towards lower bedrock elevations, would result in elevated inorganic constituent concentrations downgradient. Following construction of liner for existing Cells 1 and 2 of the WDS3 Landfill, inorganic constituent concentrations in the uppermost aquifer may be increased further due to longer residence time of groundwater (i.e. slower flow paths) and reduced localized recharge.

Data and information supporting these ASD lines of evidence are discussed in more detail below.

2.2 ASD SUPPORTING INFORMATION

2.2.1 Existing Groundwater Concentrations

A times series plot for parameters in groundwater from LS-100 is included in Figure 4 (below). CCR was first placed in Cell 2 of the Landfill in June, 2016. The concentration of sulfate during detection monitoring (15.7 mg/L) is less than that detected prior to CCR placement in WDS3 Landfill which were higher in February 2016 (16.6 mg/L) and October, 2011 (18.8 mg/L, Figure 5).

The calcium concentration in LS-100 during detection monitoring (11 mg/L) was also lower than concentrations detected historically in this well prior to CCR placement (pre-filling average 15.6 mg/L, and median 13.2 mg/L) (Figure 5).

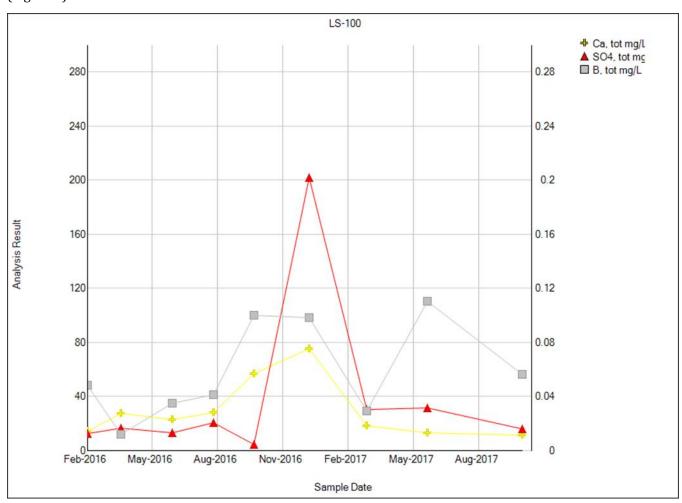


Figure 4. Time Series Plot of Calcium, Boron, and Sulfate in LS-100

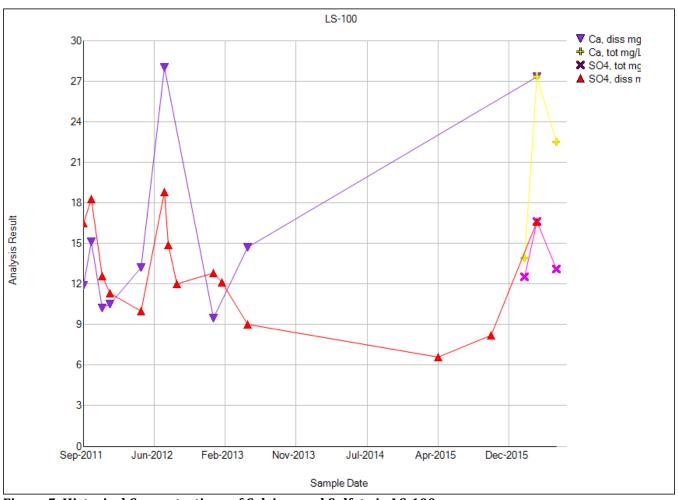


Figure 5. Historical Concentrations of Calcium and Sulfate in LS-100

Elevated concentrations of calcium and sulfate at upgradient well LS-101 also occurred prior to CCR placement in October and November, 2011 and 2012 (Figure 6). This indicates that these compounds were present both upgradient and downgradient at concentrations similar to or above those reported during detection monitoring prior to landfill construction. SSIs are attributable to variability in groundwater concentrations and not the CCR unit.

A SSI was reported for boron in LS-100, however, initial placement of CCR material began in June 2016 in Cell 2; and LS-100 is located upgradient to sidegradient of Cell 2 (Figures 2 and 3) and groundwater from below Cell 2 of the CCR unit does not flow toward LS-100. Based on existing groundwater flow directions and placement of CCR in Cell 2, boron concentrations observed in groundwater at LS-100 are unrelated to WDS3 Landfill.

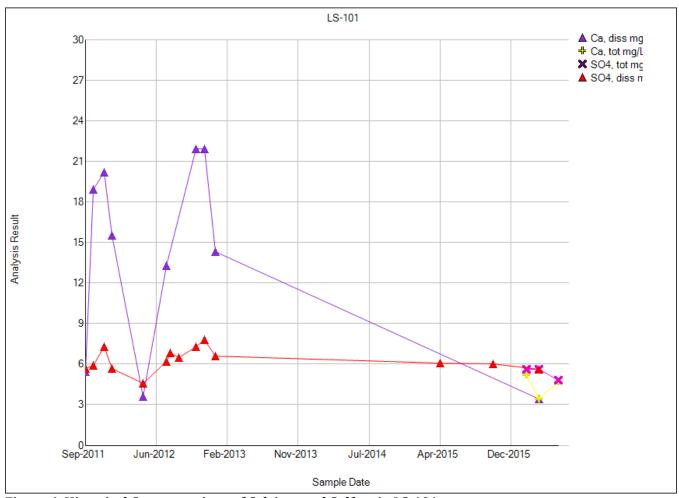


Figure 6. Historical Concentrations of Calcium and Sulfate in LS-101

Concentrations of boron, calcium, sulfate, and TDS were reported above background for LS-105 (Figure 7, below). However, the concentration of calcium (18.8 mg/L) reported during detection monitoring has been detected at higher levels prior to the construction of the landfill including October, November, and December, 2011 (20 mg/L), and in November 2013 (20.4 mg/L) (Figure 8). Calcium has also been detected above this concentration in background well LS-101 in October and November, 2011, and 2012 as shown previously in Figure 5.

Groundwater flow below the landfill is controlled by a groundwater gradient control system, such that groundwater flows towards the drainage lines when groundwater elevations are elevated (Figure 2 and 3). Based on the interpreted flow directions, the boron (0.0452 mg/L), sulfate (31 mg/L), and TDS concentrations (100 mg/L) reported for LS-105 are less than concentrations reported in well LS-100 (0.11, 202, and 360 mg/L, respectively) which is located upgradient of LS-105. Because concentrations of these parameters are not increasing downgradient of the landfill and groundwater flow toward LS-105 is limited by gradient control systems, WDS3 Landfill is not impacting groundwater.

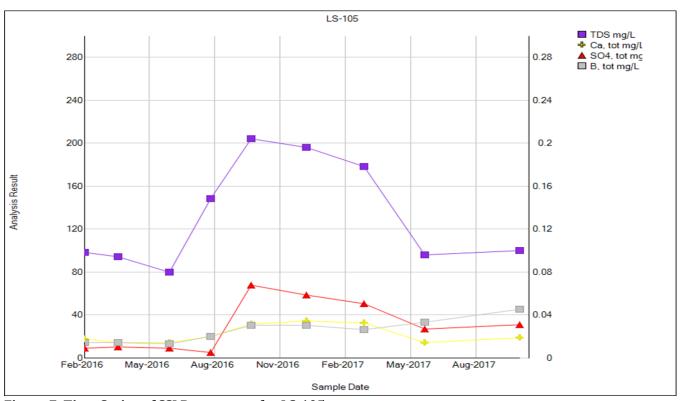


Figure 7. Time Series of SSI Parameters for LS-105

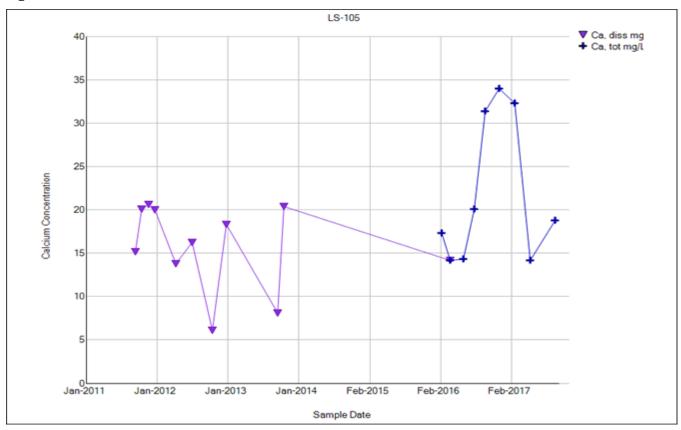


Figure 8. Time Series Plot of Calcium Concentrations at LS-105

Concentrations of boron, calcium, and TDS were also reported above background for LS-106 (Figure 9, below). However, ion rations of boron and calcium with other primary and secondary CCR indicators indicate that the groundwater from LS-106 is not affected by CCR leachate (Table 3). In the six ion ratios below, LS-106 never falls between background (LS-101) and the leachate sample, demonstrating that the leachate is not the source of elevated calcium and boron.

Table 3. Summary of Average Ion Ratios

Location ID	B/Ca	B/Cl	B/SO4	Ca/B	Ca/SO4	Ca/Cl
Leachate	0.003	0.017	0.001	290	0.28	4.9
LS-106	0.014	0.076	0.033	156	1.8	4.1
LS-101	0.004	0.022	0.003	517	1.2	5.9

TDS concentrations incorporate a number of dissolved constituents; however, because boron and sulfate are not elevated as a result of the CCR Unit, the TDS concentrations are also not attributable to the Unit.

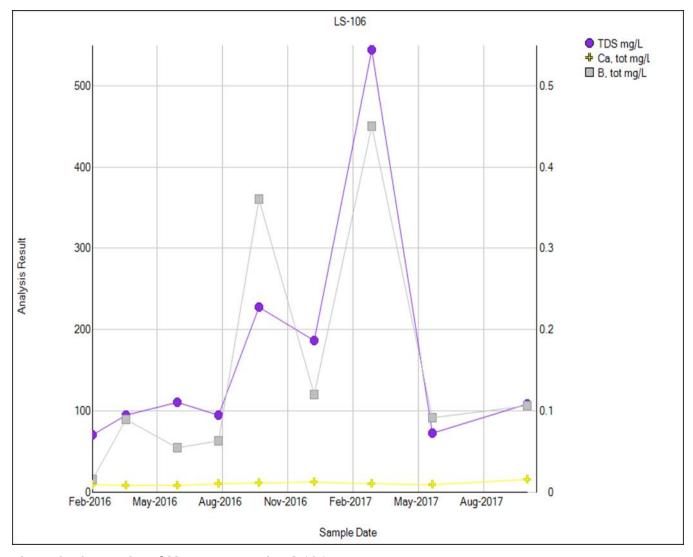


Figure 9. Time series of SSI Parameters in LS-106

Concentrations of calcium, chloride, sulfate, and TDS were reported above background for LS-107 (Figure 10, below). However, the concentration of chloride reported during detection monitoring (6.2 mg/L) was at lower levels than observed prior to construction of the CCR Unit (9.4, 7.4, and 7.9mg/L, respectively, in February, April, and June, 2016). Since concentrations exceeding this level were present prior to CCR placement into WDS3 Landfill, chloride concentrations are not attributable to the WDS3.

Boron is a conservative and non-reactive tracer of potential CCR impacts. Concentrations of boron are not elevated in groundwater collected from LS-107. The lack of elevated boron concentrations in LS-107 indicates that SSIs reported for chloride, calcium, sulfate, and TDS are from an alternate source and not attributable to WDS3 Landfill. Also, LS-107 is located downgradient of Cell 1 of WDS3 Landfill, but no CCR material has been placed in this cell, therefore SSIs reported in LS-107 are not attributable to the landfill.

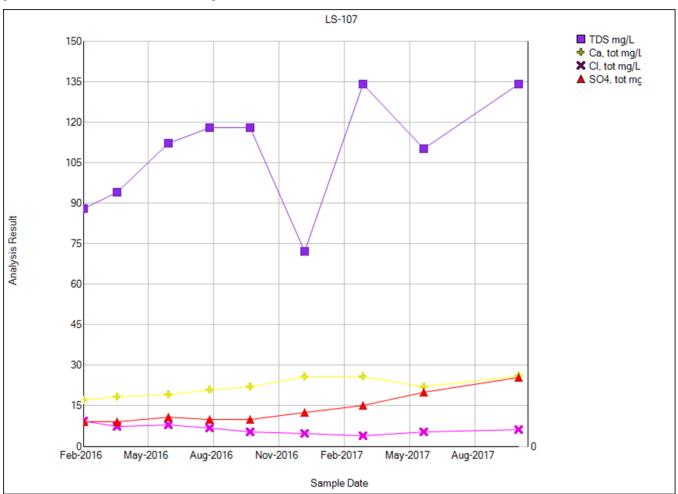


Figure 10. Time Series of SSI Parameters for LS-107

2.2.2 Landfill Design

This ASD is supported by the fact that the WDS3 Landfill was constructed with a composite 60-mil HDPE and geosynthetic clay liner with leachate collection system and groundwater gradient control system. Precipitation and/or leachate that collects on top of the HDPE liner is removed by a leachate collection system and managed in accordance with the landfill's operating permit. Leachate levels are monitored within the landfill. The system is flushed annually as part of regular operation and maintenance. System monitoring and reporting indicate that the leachate collection system is functioning as designed and indicate there is not significant leachate migration into underlying materials.

In the unlikely event that leachate was not captured by the collection system, the CCR unit and liner system overlie a groundwater gradient control system which would also collect leachate and direct it south of the landfill. WDS3 has only accepted CCR materials since June 2016, making it unlikely that leachate could migrate into groundwater. Landfill design with leachate and groundwater gradient control systems are a line of evidence that any current SSIs are attributable to another source.

2.2.3 Variability of Uppermost Aquifer and Geochemistry

The uppermost aquifer on site is composed of silty sand and weathered bedrock, where encountered at shallow depths. Figure 11 (below) shows the well screen intervals, the ground surface, and the depth to the granitic bedrock. It is important to note that background well LS-101 is screened almost entirely in the granitic bedrock, while downgradient wells are screened in a combination of bedrock and silty sand. The different composition of the aquifer materials can play a significant role in the concentrations of naturally occurring inorganic constituents. In addition, variability in groundwater elevations may result in more water being sampled from the bedrock when groundwater levels are low, specifically in LS-100. In this well, approximately 6 to 7 feet of silty sand is saturated during periods of higher groundwater levels, while only 3 to 4 feet of silty sand is saturated during periods of lower groundwater levels.

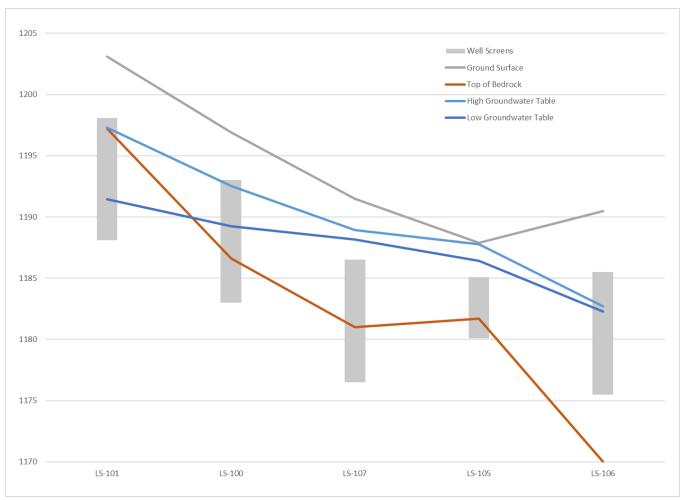


Figure 11. Summary of Well Screen Intervals, High and Low Groundwater Elevations, and Bedrock Surface

The general water chemistry is plotted in the Piper diagram below (Figure 12). The downgradient monitoring wells plot between the background well and leachate, but LS-106, with the highest reported boron concentration, is closer to background than the other downgradient wells. LS-107, in which boron was not above

WESTON DISPOSAL SITE NO. 3 LANDFILL 40 CFR § 257.94(E)(2): ALTERNATE SOURCE DEMONSTRATION

the prediction interval, also plots closer to leachate than the background well. LS-100 plots nearest the leachate sample, but based on flow directions and the current area of filling (Cell 2), this well is not downgradient of the CCR unit. Elevated parameter concentrations at well LS-100 may be affected by an alternate source east of the CCR unit impacting groundwater. This observation is supported by the concentrations in LS-105, which is also located on the eastern portion of the site and plots on the Piper diagram nearest LS-100, suggesting water of a similar origin.

The Stiff Diagram, Figure 13, further illustrates that downgradient groundwater quality is very similar to background well LS-101 and does not appear to be affected by the leachate.

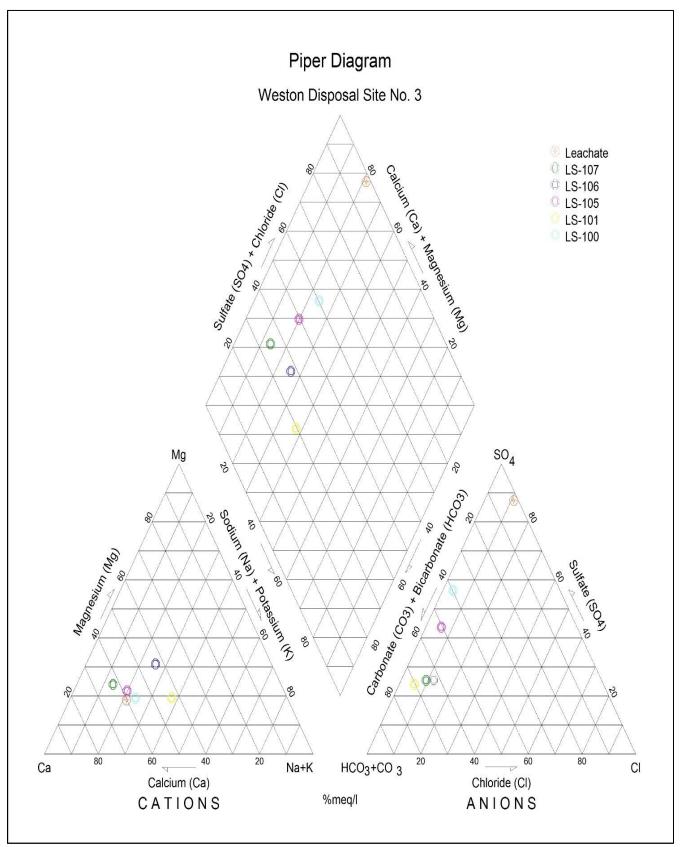


Figure 12. Piper Diagram of Water Quality

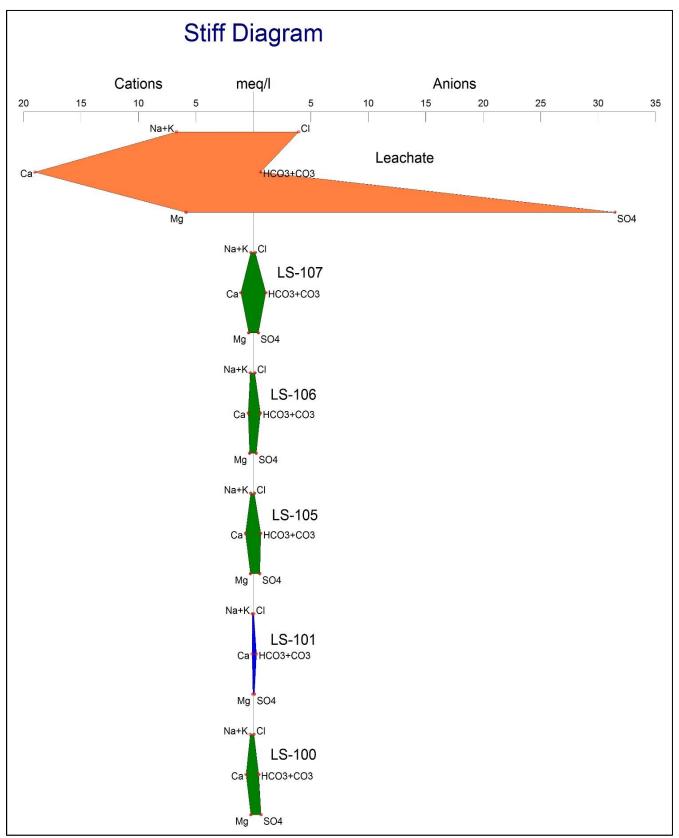


Figure 13. Stiff Diagram of Water Quality.

2.2.4 Changes in Geochemical Conditions From Landfill Construction

Prior to construction of WDS3 Landfill, the site had not been significantly altered since 1990. In 2015 significant construction activities (including stripping of topsoil, trees, and vegetation and placement of general fill and clay) modified a large portion of the site (Figure 14). Given the shallow depth to groundwater and quick recharge of the uppermost aquifer it is expected that these modifications would significantly impact shallow groundwater quality. Precipitation that recharges the groundwater has a pH less than 7 STD; however, interaction with the clay minerals and general fill will result in dissolution of calcium carbonate and other minerals, which will elevate pH and increase concentrations of naturally occurring compounds. The clay liner material from the former landfill was tested to ensure that all CCR was removed (TRC, 2016). Testing results of samples from the former clay liner had calcium concentrations ranging from 1.35 to 2.6 mg/kg. Testing results of clay samples for use onsite during construction had concentrations of boron ranging from 0.1 to 0.2 mg/kg and sulfur from 10 to 50 mg/kg (Attachment C). Although this clay was not used for the liner it was used as general fill around the site and stockpiled for future use. Therefore, the clay from the former landfill and brought to the site for construction and general fill material provide a source of calcium and other minerals that may be mobilized by acidic precipitation and alter concentrations detected in monitoring wells downgradient.



Figure 14. Aerial photograph of site in Summer 2015

The change in geochemical conditions of groundwater following construction of the landfill is illustrated by changes in pH (Figure 15, below). The landfill construction was completed in late 2015 and in the spring of 2016 seasonal recharge due to snow melt and precipitation resulted in lower pH. In the fall of 2016 and winter of 2017, during a period of generally lower groundwater elevations, the pH increased. It declined again in the spring of 2017, again likely due to increased seasonal recharge. Due to the short time period since landfill construction was completed, it is not known if similar seasonal pH trends will be observed in the future. Historical data from the site, indicates seasonality in pH measurements similar to what was observed in these wells.

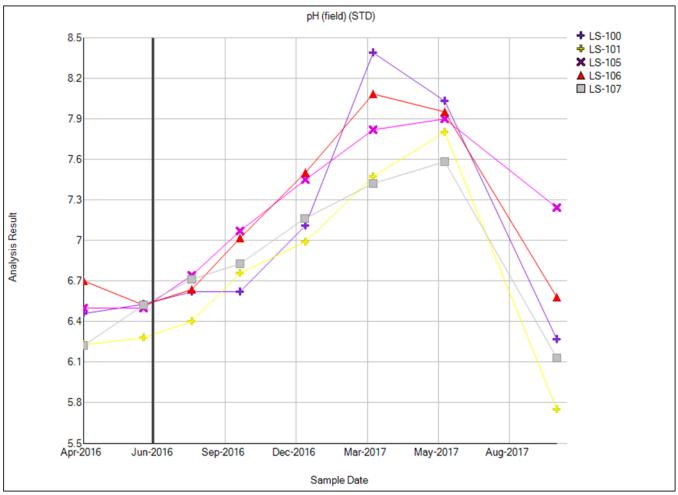


Figure 15. Time Series of pH Measurements in CCR Rule Wells

The placement of geologic materials from offsite to construct the landfill will change the geochemistry of the uppermost aquifer, specifically in locations were the materials become saturated or precipitation percolates through the materials to recharge the uppermost aquifer. Areas where water will likely migrate through placed materials include both the current sedimentation basins and the former sedimentation basin, which was filled prior to construction of Cell 2 of the landfill (See TRC Sheet 4 of 29 in Attachment A). These locations occur upgradient of well LS-106 and are near LS-100 and LS-105, all of which had reported SSIs. The duration of impacts to groundwater from construction activities is unknown, but eventually groundwater will reach equilibrium with the newly placed construction materials and groundwater parameter concentrations will become more stable.

3 CONCLUSIONS AND CERTIFICATION

This document has been prepared on behalf of WPSC by OBG to provide pertinent information for an ASD as allowed by 40 CFR §257.94(e)(2) for the Weston Disposal Site No. 3 Landfill located in the Town of Knowlton, Wisconsin.

Initial background groundwater monitoring consisting of a minimum of eight samples as required under 40 CFR §257.94(b) was initiated in February 2016 and completed prior to October 17, 2017. The first semi-annual detection monitoring sample was collected on October 12, 2017 for which analytical data was received on October 26, 2017. Statistical analysis of the first detection monitoring sample for SSIs of 40 CFR Part 257 Appendix III parameters over background concentrations was completed within 90 days of collection of the sample (January 15, 2018). The determination identified the following SSIs (concentrations greater than background prediction intervals) at downgradient monitoring wells:

- Boron at wells LS-100, LS-105, and LS-106
- Calcium at wells LS-100, LS-105, LS-106, and LS-107
- Chloride at well LS-107
- Sulfate at wells LS-100, LS-105, and LS-107
- Total dissolved solids at wells LS-105, LS-106, and LS-107

40 CFR §257.94(e)(2) allows the owner or operator 90 days from the date of determination to demonstrate that a source other than the CCR unit caused the SSI, or that the apparent SSI was from a source other than the CCR unit, or that the SSI resulted from errors in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. Pursuant to 40 CFR §257.94(e)(2), this document demonstrates that sources other than the WDS3 Landfill were the cause of the SSIs listed above. This ASD was completed within 90 days of determination of the SSIs (April 15, 2018) as required by 40 CFR §257.94(e)(2).

Pursuant to 40 CFR §257.94(e)(2), the following lines of evidence were presented in this report to demonstrate that the listed SSIs are due to alternate sources as follows:

- Existing groundwater concentrations
- Landfill design
- Variability of uppermost aguifer and geochemistry
- Changes in geochemical conditions from landfill construction

The preceding information serves as the ASD prepared in accordance with 40 CFR §257.94(e)(2) and supports the position that the SSIs observed during the first semi-annual detection monitoring event are not due to a release from the CCR unit but were from naturally occurring conditions and anthropogenic impacts in the area of WDS3 Landfill. Therefore, no further action (i.e. assessment monitoring) is warranted and the Weston Disposal Site No. 3 Landfill will remain in detection monitoring.

WESTON DISPOSAL SITE NO. 3 LANDFILL 40 CFR § 257.94(E)(2): ALTERNATE SOURCE DEMONSTRATION

I, Glenn R. Luke, a qualified professional engineer in good standing in the State of Wisconsin, certify that enclosed information is accurate as of the date of my signature below. The content of this report is not to be used for other than its intended purpose and meaning, or for extrapolations beyond the interpretations contained herein.

Glenn R. Luke, PE

Professional Engineer No. 42834-6

State of Wisconsin

O'Brien & Gere Engineers, Inc.

Date: April 15, 2018

I, Nathaniel R. Keller, a qualified professional geologist, certify that the enclosed information is accurate as of the date of my signature below. The content of this report is not to be used for other than its intended purpose and meaning, or for extrapolations beyond the interpretations contained herein.

Nathaniel R. Keller, PG

Professional Geologist No. XXXX

State of Wisconsin

O'Brien & Gere Engineers, Inc.

Date: April 15, 2018

REFERENCES

AECOM, 2012. Feasibility Report, Proposed Weston Disposal Site No. 3 Expansion.

GEI, 2016. Memorandum to Tom Janssen and Dawn DeJardin. Weston Disposal Site No. 3 EPA CCR Groundwater Monitoring Plan. January 26, 2016

TRC, 2016. Phase 1 Closure Report. Included as Appendix C of the Construction Documentation Report.

Natural Resource Technology, an OBG Company, 2017a, Sampling and Analysis Plan, Weston Disposal Site No. 3 Wisconsin, October 2, 2017.

Natural Resource Technology, an OBG Company, 2017b, Statistical Analysis Plan, Weston Disposal Site No. 3, Rothschild, Wisconsin, October 17, 2017.



Table 1. CCR Rule Groundwater Monitoring Well Information Weston Disposal Site No. 3 Wisconsin Public Service Corporation

Town of Knowlton, WI

Well Designation	Wisconsin Unique Well Number	Date Well Installed	Drilling Subcontractor	Drilling Method	Gradient Position	State Plane Northing	State Plane Easting	Latitude	Longitude	Ground Surface Elevation (ft NAVD88)	Top of Protective Cover Pipe Elevation (ft NAVD88)	Top of Well Riser Elevation (ft NAVD88)	Borehole Drilled Depth (ft bgs)	Borehole Bottom Elevation (ft NAVD88)	Depth to Top of Well Screen (ft bgs)	-	Elevation	Well Bottom Elevation (ft NAVD88)	Top of Bedrock Elevation (ft NAVD88)
LS-100	VU955	8/23/2011	Badger State Drilling	Air Rotary and Hollow Stem Auger	Downgradient	325,223	2,063,529	44.72484	-89.63437	1196.9	1199.26	1199.04	14.5	1182.4	3.9	13.9	1193.0	1183.0	1186.6
LS-101	VU952	7/13/2011	Badger State Drilling	Air Rotary and Hollow Stem Auger	Upgradient	325,816	2,063,032	44.72648	-89.63627	1203.1	1205.58	1205.41	16.5	1186.6	5.0	15.0	1198.1	1188.1	1197.2
LS-105	VU953	7/14/2011	Badger State Drilling	Air Rotary and Hollow Stem Auger	Downgradient	324,533	2,063,527	44.72295	-89.63439	1187.9	1190.42	1190.28	9.3	1178.6	2.8	7.8	1185.1	1180.1	1181.7
LS-106	-	2/5/2016	Coleman Engineering Company	Hollow Stem Auger	Downgradient	324,253	2,063,283	44.72219	-89.63533	1190.5	1193.26	1193.24	15.5	1175.0	5.0	15.0	1185.5	1175.5	NE
LS-107	-	2/5/2016	Coleman Engineering Company	Air Rotary	Downgradient	325,749	2,062,448	44.72630	-89.63852	1191.5	1194.50	1194.40	15.5	1176.0	5.0	15.0	1186.5	1176.5	1181.0

Notes:

Ground surface, top of protective cover pipe and top of well riser elevations for wells obtained from well construction forms and tablulated summary provided by GEI Consultants. Elevation datum is referenced to North American Vertical Datum 1988 (NAVD88).

Horizontal Datum is referenced to Wisconsin State Plane Coordinate System, Central Zone, North America Datum (NAD 83/2007), US Survey Feet.

All wells constructed with 2-inch nominal size schedule 40 PVC with 5-foot to 10-foot long 10-slot screens.

bgs = below ground surface

ft = feet

"--" = information not available

NE = Not encountered.

Weston Disposal Site #3
Table 2. Weston Disposal Site No. 3 Landfill: Appendix III Analytical Results

Date Range: 02/18/2016 to 10/11/2017 Well Id **Date Sampled** Lab Id B, tot, mg/L Ca, tot, mg/L Cl, tot, mg/L F, tot, mg/L pH (field), STD SO4, tot, mg/L LS-100 40128408001 02/18/2016 0.0480 13.900 4.000 < 0.200 12.500 04/05/2016 40130257002 0.0120 27.300 4.300 < 0.200 6.460 16.600 06/15/2016 40133877003 0.0350 22.500 3.600 < 0.200 6.530 13.100 0.0410 20.700 08/10/2016 40136543003 28.200 4.900 < 0.200 6.620 10/05/2016 40139741002 0.1000 56.800 0.970 < 0.100 4.500 6.620 12/21/2016 40143755003 0.0980 75.200 21.000 < 0.100 202.000 7.110 30.000 03/10/2017 40146662002 0.0290 17.900 3.600 < 0.100 8.390 06/02/2017 40151013002 0.1100 13.100 1.600 < 0.100 8.030 31.500 40158568002 15.700 10/11/2017 0.0559 11.000 0.860 < 0.100 6.270 LS-101 02/18/2016 40128408002 0.0086 5.200 2.900 < 0.200 5.600 04/05/2016 40130257003 0.0096 < 0.200 6.230 3.400 2.300 5.600 06/15/2016 40133877002 0.0097 4.700 2.600 < 0.200 6.280 4.800 08/10/2016 40136543002 0.0140 11.600 2.400 < 0.200 6.400 4.100 10/05/2016 40139741003 0.0120 6.800 2.000 < 0.100 6.760 13.300 12/21/2016 40143755002 0.0120 6.900 0.820 < 0.100 6.990 4.300 03/10/2017 0.0092 3.300 < 0.500 < 0.100 7.470 4.400 40146662003 06/02/2017 40151013003 0.0430 2.500 0.720 < 0.100 7.800 4.100 10/11/2017 40158568003 0.0138 11.400 0.760 < 0.100 5.750 5.900 LS-105 02/18/2016 40128408003 0.0140 17.300 4.200 < 0.200 9.200 04/05/2016 40130257004 0.0140 14.200 3.500 < 0.200 6.500 10.000 06/15/2016 40133877004 0.0130 14.300 3.500 < 0.200 6.500 9.100 08/10/2016 40136543004 0.0200 20.100 2.900 < 0.200 6.740 4.800 10/05/2016 40139741004 0.0300 31.400 < 1.000 67.800 12.400 7.070 0.0300 12/21/2016 40143755005 34.000 10.600 < 0.500 7.450 58.600 03/10/2017 40146662004 0.0260 32.300 7.200 < 0.100 7.820 50.400 0.0330 14.200 < 0.100 7.900 26.500 06/02/2017 40151013004 2.600 10/11/2017 40158568004 0.0452 18.800 3.600 < 0.500 7.240 31.000 LS-106 02/18/2016 40128408004 0.0150 9.200 4.200 < 0.200 6.700 04/05/2016 40130257005 0.0890 7.700 3.200 < 0.200 6.700 6.600 06/15/2016 40133877005 0.0540 7.600 3.200 < 0.200 6.520 5.500 08/10/2016 40136543005 0.0630 10.100 <10.000 < 1.000 <10.000 6.640 10/05/2016 40139741005 0.3600 10.700 2.800 < 0.500 7.020 < 5.000 5.700 12/21/2016 40143755006 0.1200 12.300 < 2.500 < 0.500 7.500 03/10/2017 0.4500 9.900 < 2.500 < 0.500 8.080 5.200 40146662005 06/02/2017 40151013005 0.0910 9.400 4.100 < 0.500 7.950 11.800 10/11/2017 40158568005 0.1060 15.500 3.600 < 0.500 6.580 11.400

Weston Disposal Site #3
Table 1. Weston Disposal Site No. 3 Landfill: Appendix III Analytical Results

Date Range: 02/18/2016 to 10/11/2017								
			B, tot, mg/L	Ca, tot, mg/L	Cl, tot, mg/L	F, tot, mg/L	pH (field), STD	SO4, tot, mg/L
LS-107	02/18/2016	40128408005	0.0100	17.000	9.400	< 0.200		9.000
25 10,	04/05/2016	40130257006	0.0097	18.200	7.400	< 0.200	6.220	9.200
	06/15/2016	40133877001	0.0089	19.100	7.900	< 0.200	6.520	10.800
	08/10/2016	40136543001	0.0120	21.000	6.900	< 0.200	6.710	10.000
	10/05/2016	40139741006	0.0120	22.000	5.400	< 0.100	6.830	10.000
	12/20/2016	40143755001	0.0140	25.900	4.700	< 0.100	7.160	12.500
	03/10/2017	40146662006	0.0110	25.700	3.800	< 0.100	7.420	15.200
	06/02/2017	40151013006	0.0310	21.900	5.400	< 0.100	7.580	19.900
	10/11/2017	40158568006	0.0143	26.000	6.200	< 0.100	6.130	25.500

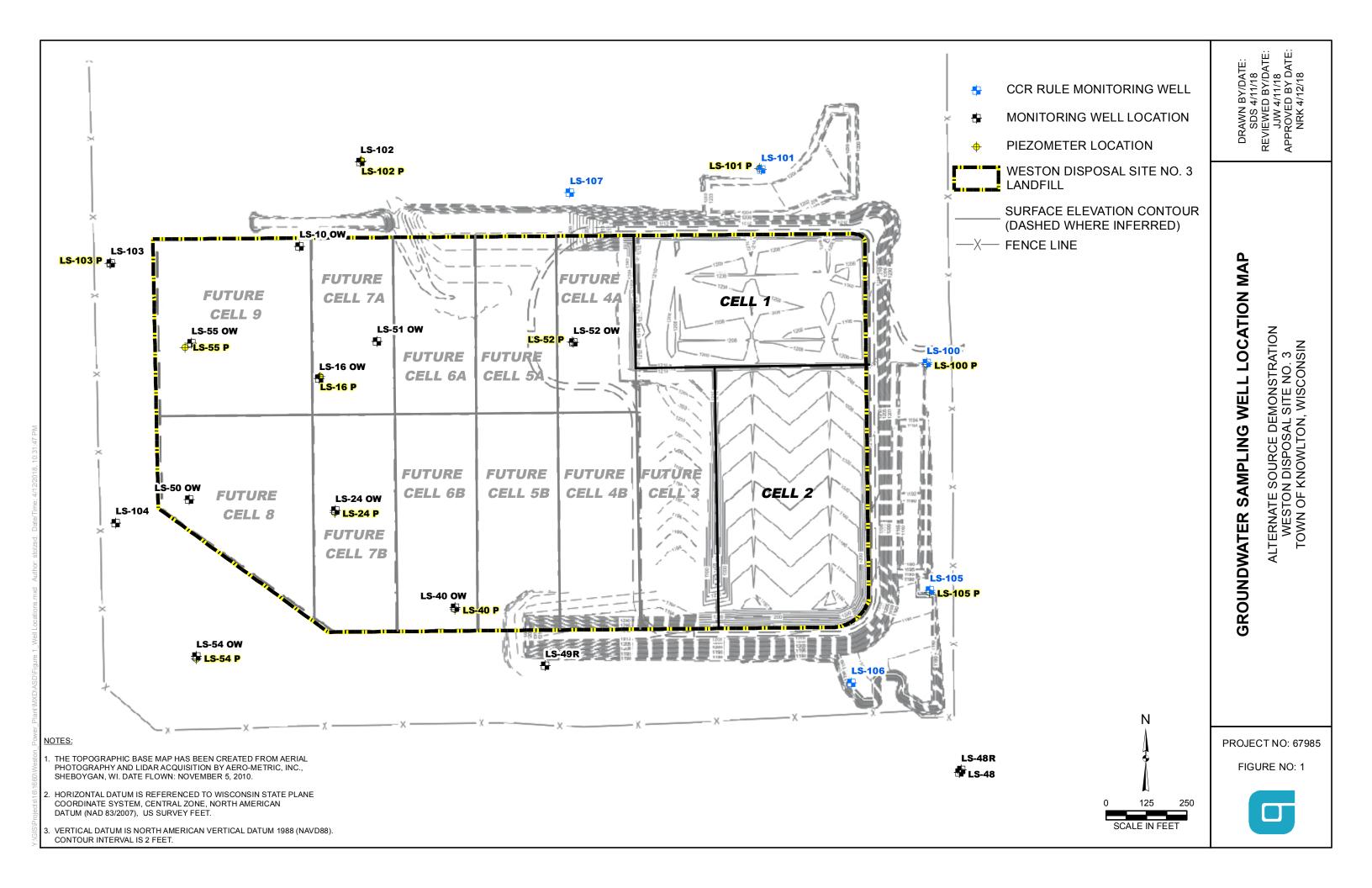
Weston Disposal Site #3
Table 1. Weston Disposal Site No. 3 Landfill: Appendix III Analytical Results

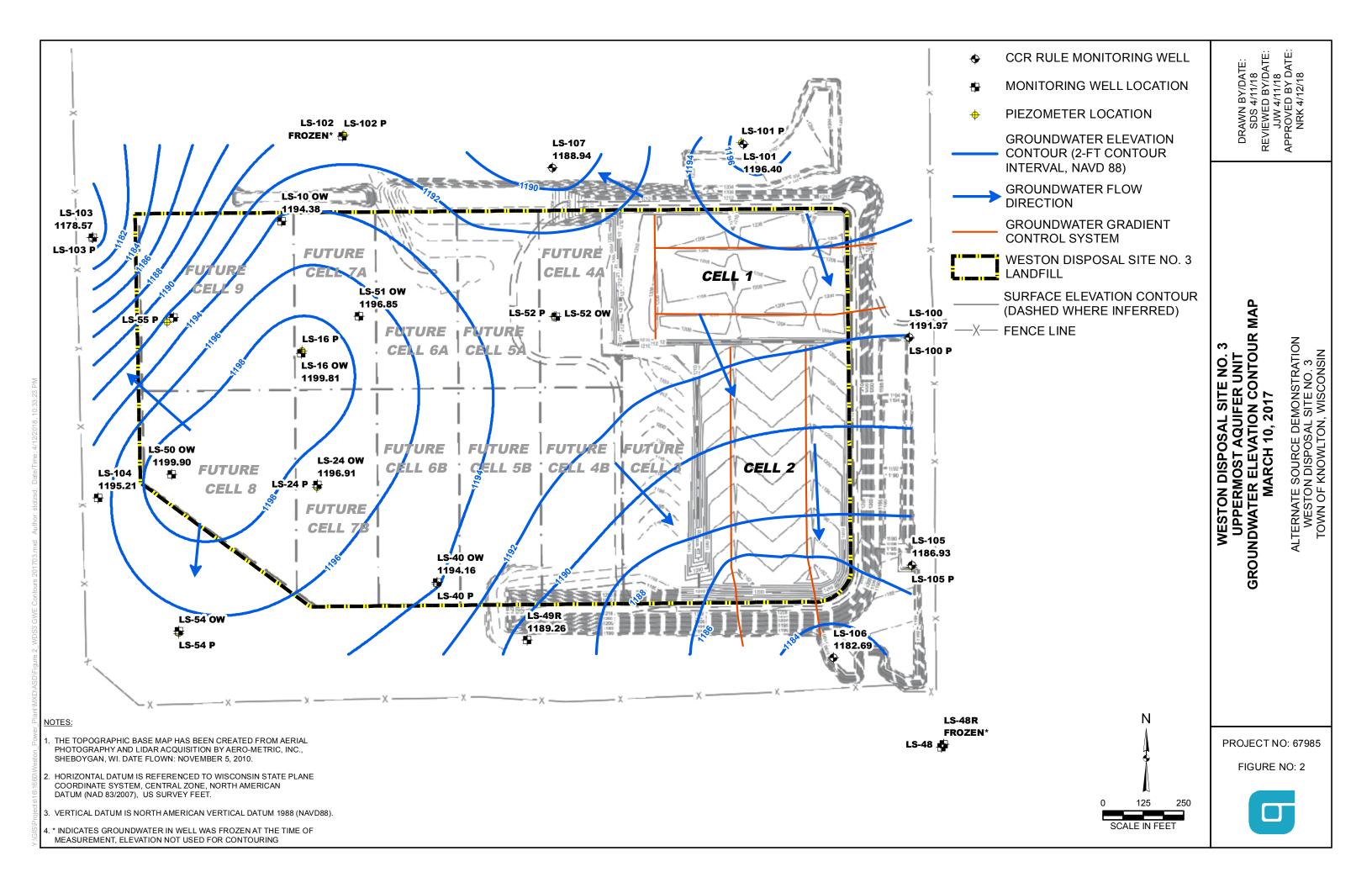
Date Range: 02	/18/2016 to 10/11/2	017	
Well Id	Date Sampled	Lab Id	TDS, mg/L
LS-100	02/18/2016	40128408001	122.000
LD-100	04/05/2016	40130257002	150.000
	06/15/2016	40133877003	148.000
	08/10/2016	40136543003	182.000
	10/05/2016	40139741002	306.000
	12/21/2016	40143755003	360.000
	03/10/2017	40146662002	98.000
	06/02/2017	40151013002	94.000
	10/11/2017	40158568002	80.000
LS-101	02/18/2016	40128408002	50.000
LO-101	04/05/2016	40130257003	52.000
	06/15/2016	40133877002	44.000
	08/10/2016	40136543002	84.000 84.000
	10/05/2016	40139741003	70.000
	12/21/2016	40143755002	60.000
	03/10/2017	40146662003	28.000
	06/02/2017	40151013003	30.000
	10/11/2017	40151013003	62.000
LS-105	02/18/2016	40128408003	98.000
LO-103	04/05/2016	40130257004	94.000
	06/15/2016	40133877004	80.000
	08/10/2016		148.000
	10/05/2016	40136543004	204.000
		40139741004	196.000
	12/21/2016 03/10/2017	40143755005	178.000
		40146662004	
	06/02/2017	40151013004	96.000
I C 106	10/11/2017	40158568004	100.000
LS-106	02/18/2016	40128408004	70.000
	04/05/2016	40130257005	94.000
	06/15/2016	40133877005	110.000
	08/10/2016	40136543005	94.000
	10/05/2016	40139741005	228.000
	12/21/2016	40143755006	186.000
	03/10/2017	40146662005	544.000
	06/02/2017	40151013005	72.000
	10/11/2017	40158568005	108.000

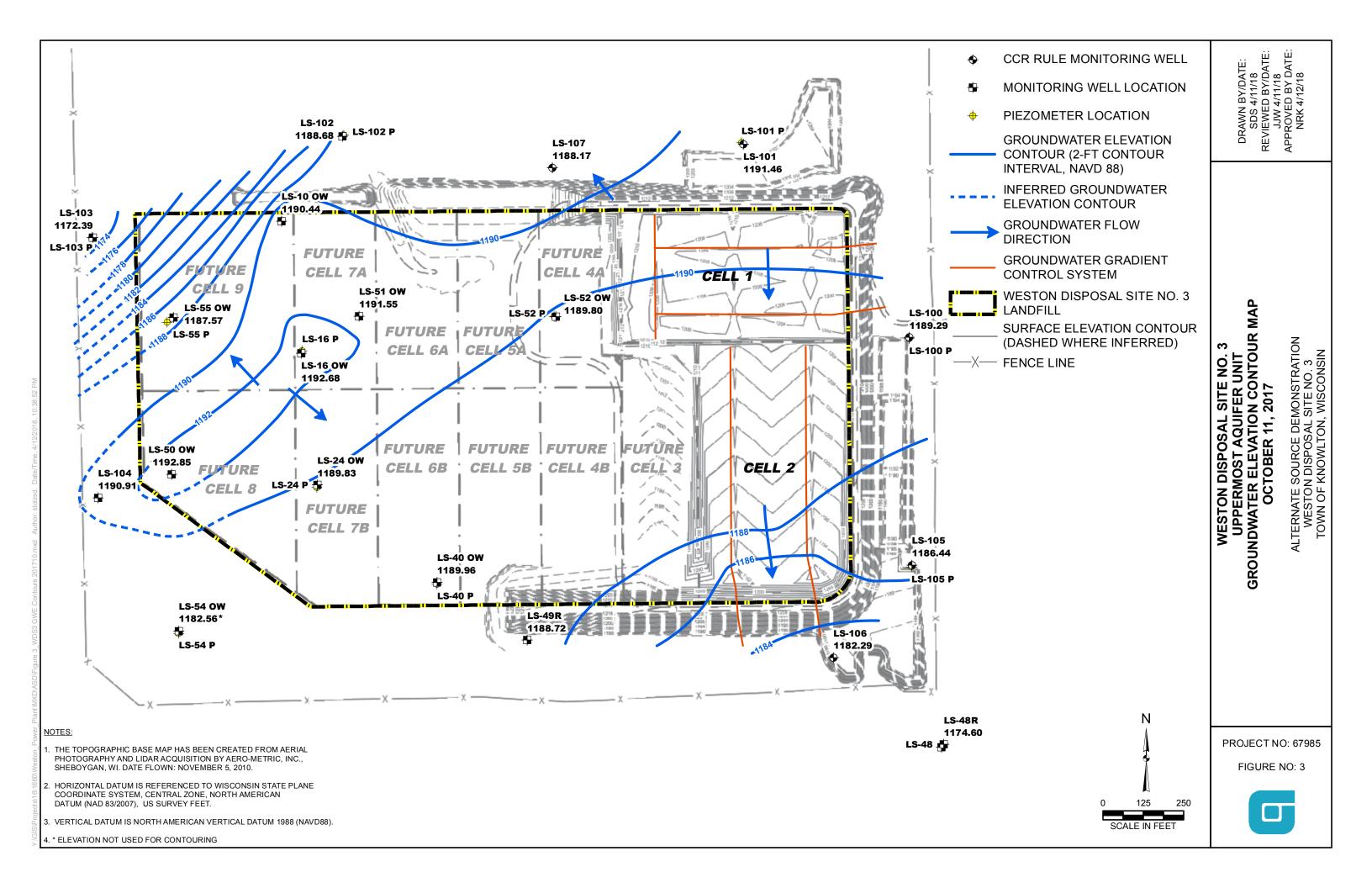
Weston Disposal Site #3 Table 1. Weston Disposal Site No. 3 Landfill: Appendix III Analytical Results

Date Range: 02/18/2016 to 10/11/2017							
			TDS, mg/L				
LS-107	02/18/2016	40128408005	88.000				
	04/05/2016	40130257006	94.000				
	06/15/2016	40133877001	112.000				
	08/10/2016	40136543001	118.000				
	10/05/2016	40139741006	118.000				
	12/20/2016	40143755001	72.000				
	03/10/2017	40146662006	134.000				
	06/02/2017	40151013006	110.000				
	10/11/2017	40158568006	134.000				



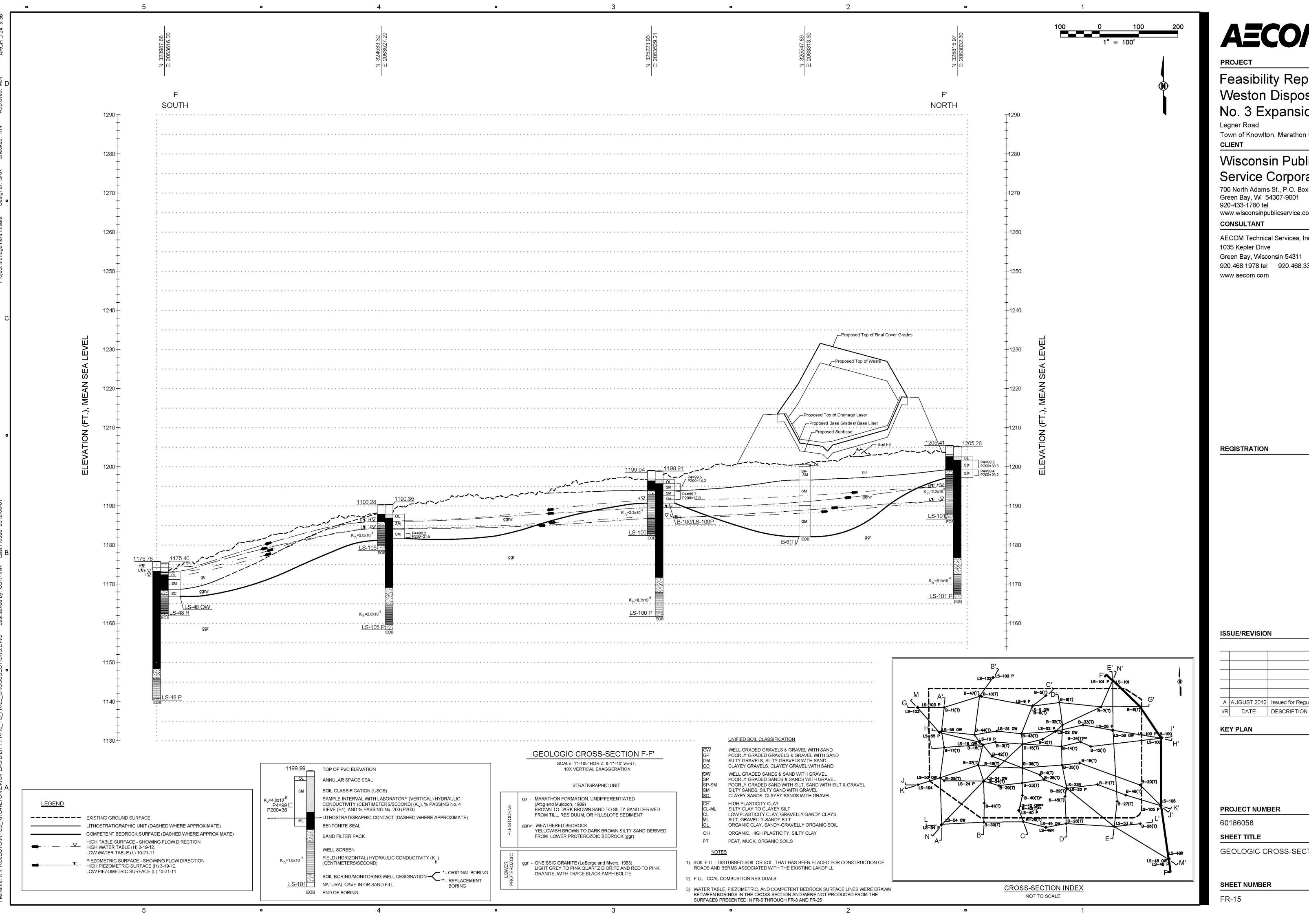






Attachment A

Select Cross-Sections and Drawings from Previous Reports



Feasibility Report
Weston Disposal Site

Town of Knowlton, Marathon County, WI

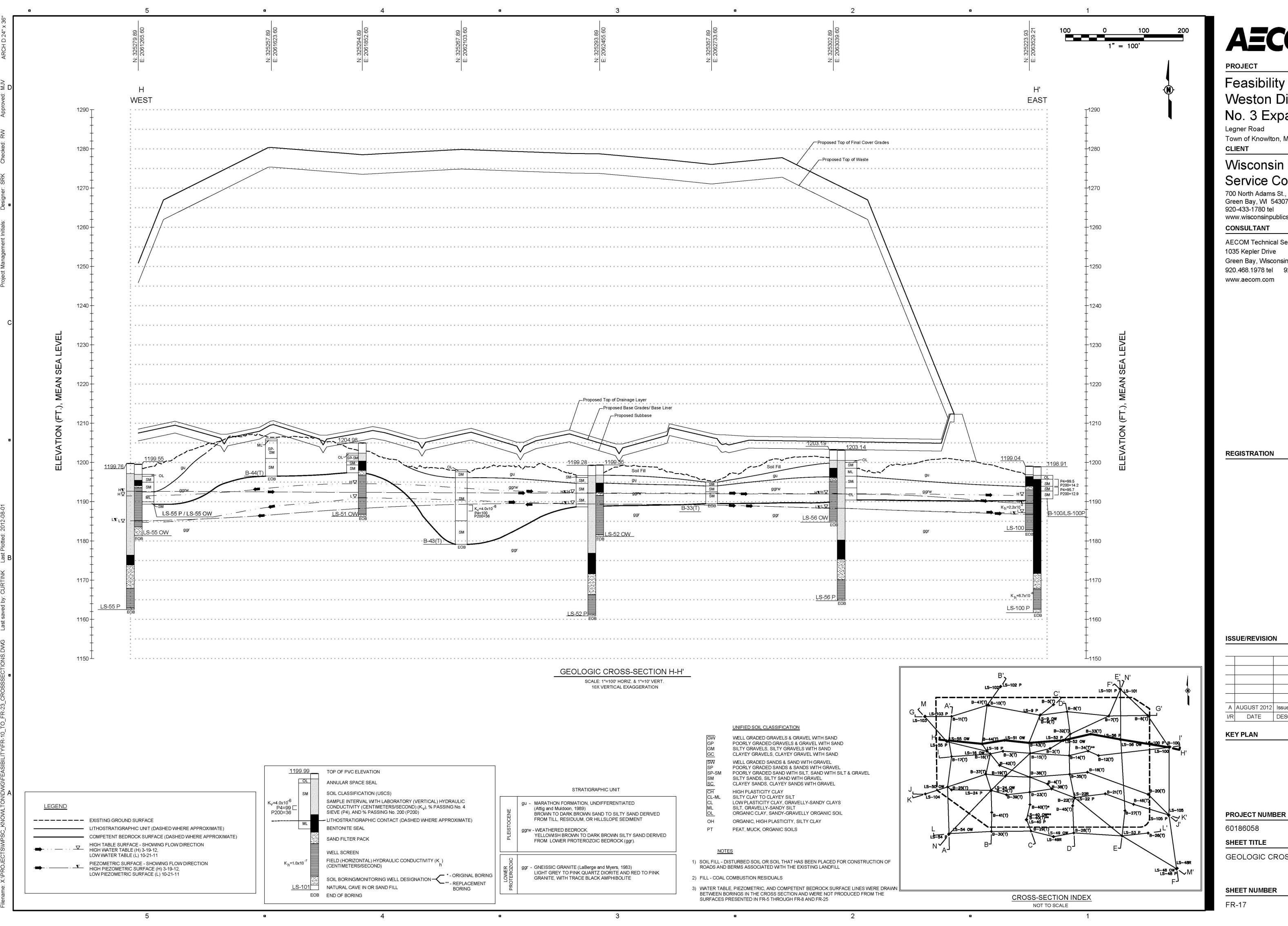
Wisconsin Public **Service Corporation**

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AECOM Technical Services, Inc. Green Bay, Wisconsin 54311 920.468.1978 tel 920.468.3312 fax



GEOLOGIC CROSS-SECTION F-F'



Feasibility Report Weston Disposal Site

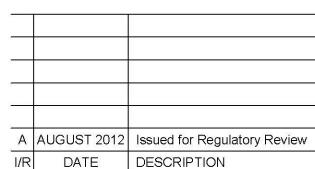
Town of Knowlton, Marathon County, WI

Wisconsin Public

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REGISTRATION

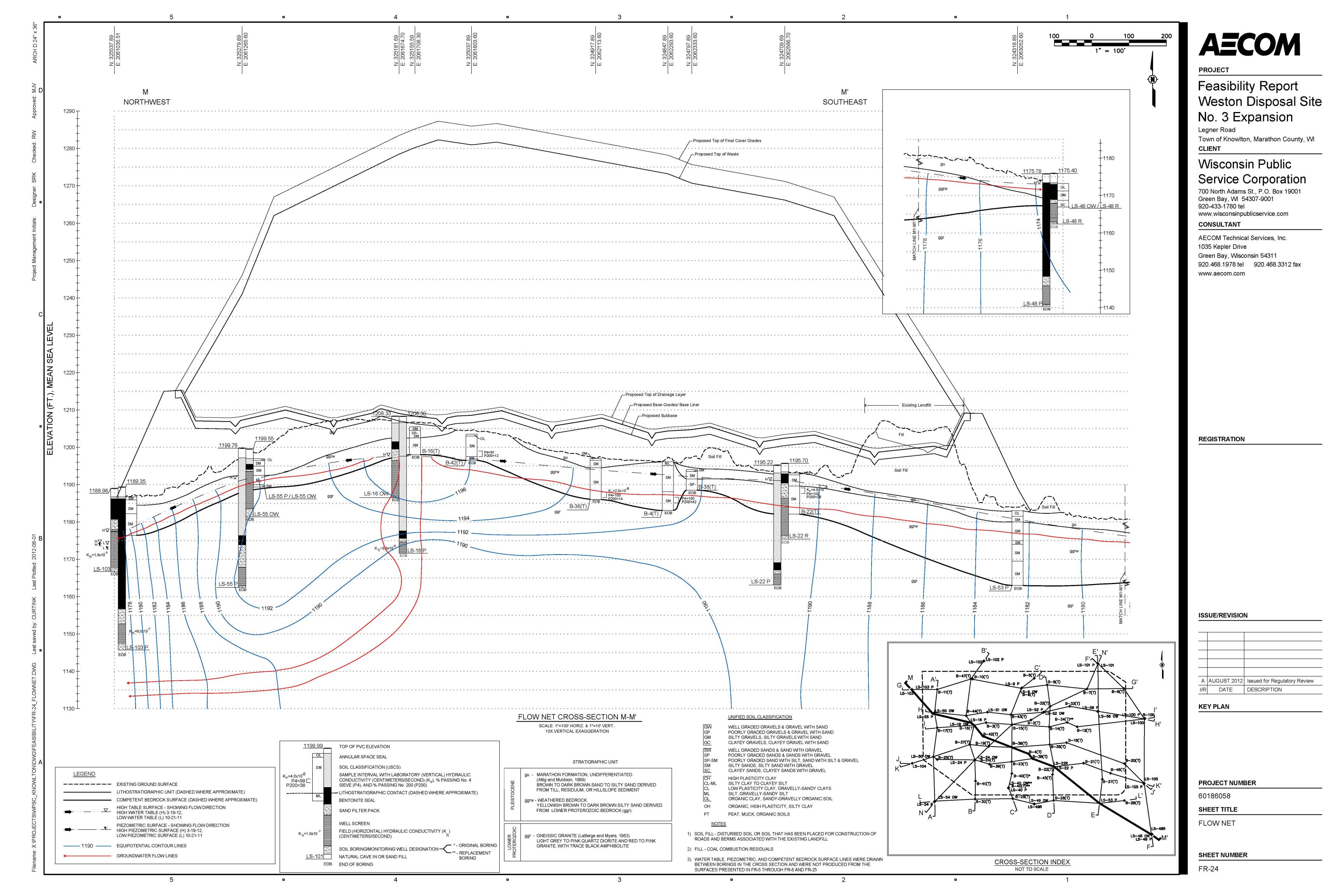


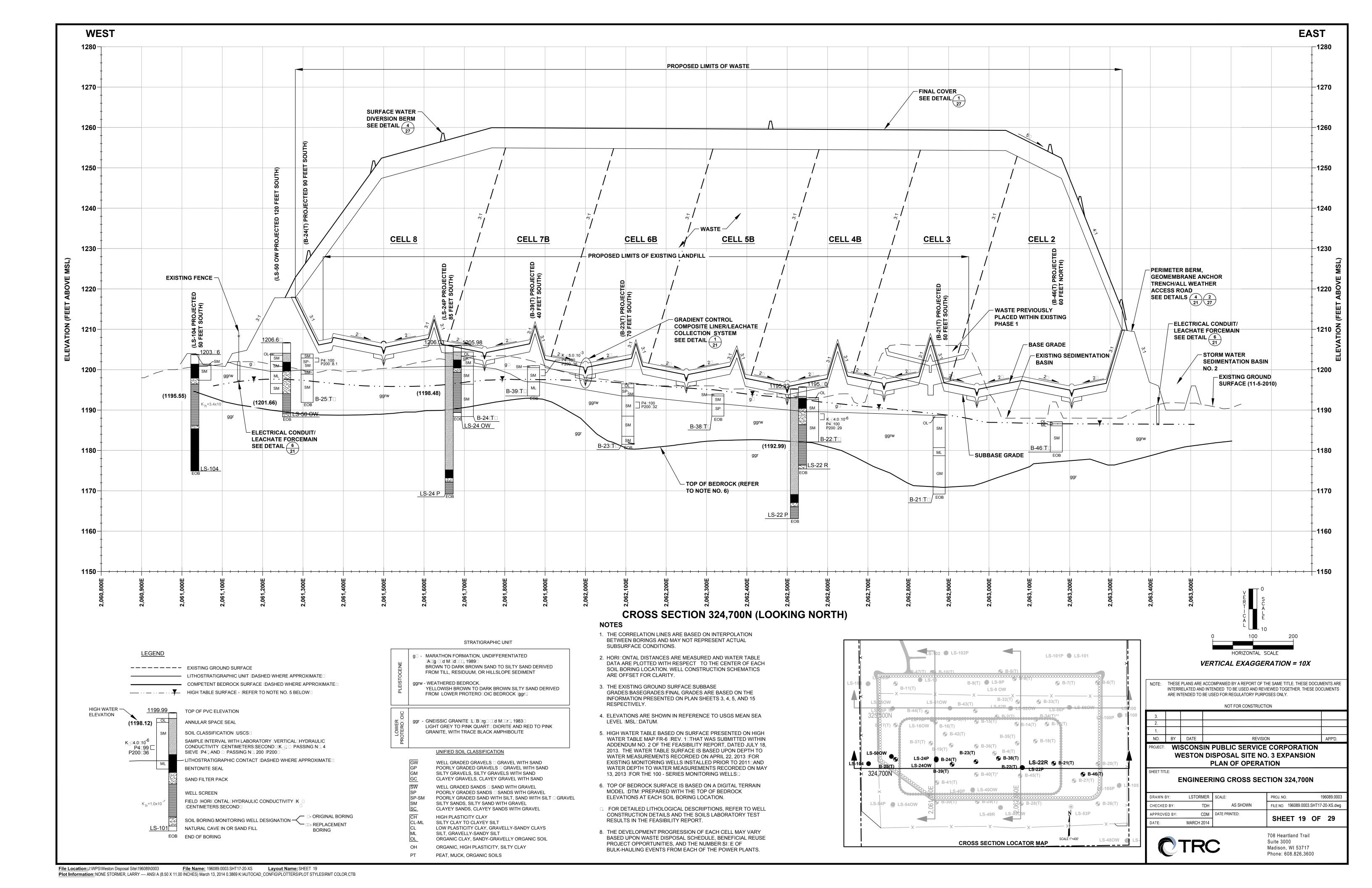
KEY PLAN

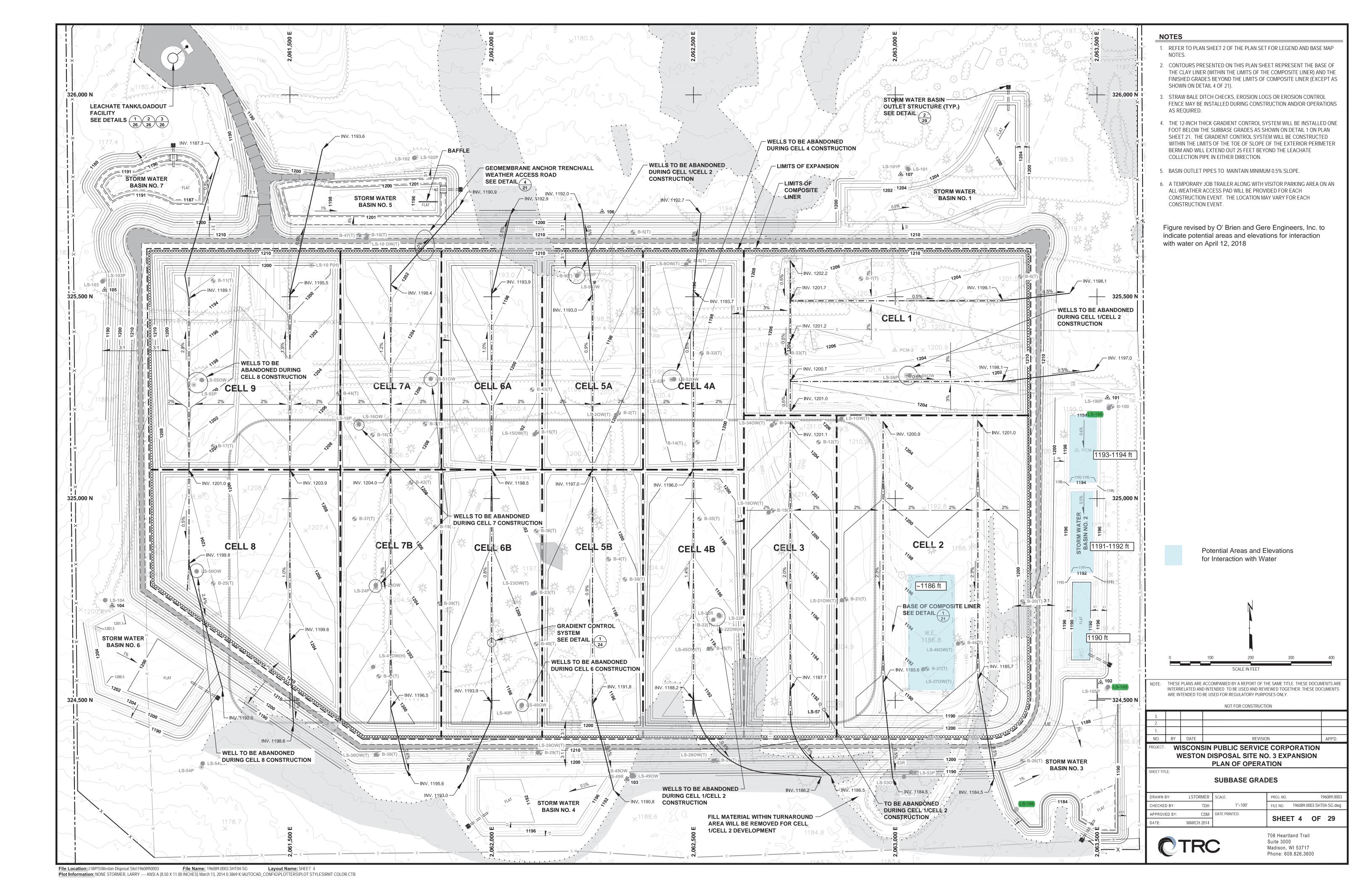
SHEET TITLE

GEOLOGIC CROSS-SECTION H-H'

SHEET NUMBER







Attachment B WDNR Construction Documentation Approval for Cell 1 & 2

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1300 W. Clairemont Ave.
Eau Claire WI 54701

Scott Walker, Governor Cathy Stepp, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



April 22, 2016

File Ref: FID # 737054120 Marathon County SW / Approval File

Ms. Dawn DeJardin Wisconsin Public Service Corporation 700 North Adams Green Bay, WI 54307-9001

Subject: Construction documentation approval for the Cell 1 & 2 liners at the Wisconsin Public

Service Corporation (WPSC) Weston Disposal Site No. 3 located in the Town of

Knowlton, Marathon County, Wisconsin (DNR License No. 3067)

Dear Ms. DeJardin:

We have reviewed and approved the construction documentation report for the Cell 1 & 2 liner at the WPSC landfill. Please include the attached approval in the written operating record for the landfill as specified in s. NR 506.17, Wisconsin Administrative Code.

The report documents construction activities pertaining to Cells 1 & 2 (approximately 15.2 acres). River View Construction began construction activities on May 12, 2015 and TRC oversaw quality assurance on all activities through December 23, 2015. The report outlined two deviations: ash from Phase I was hauled to Lincoln County landfill instead of being placed in Cell 1; and approximately 5% of the granular fill used in the leachate drainage blanket is greater than ¼-inch. These deviations are acceptable to the Department with no additional action being required.

The report includes monitoring well abandonment forms, including a form for a non-potable water supply well (CQ997) not previously identified in either the feasibility report or the plan of operation report for the landfill expansion. During Department site visits, the well was not brought to the attention of the inspector at the time. Pursuant to the locational criteria in ss. NR 504.04(3)(f), and NR512.05, Wis. Adm. Code, all water supply wells within 1,200 feet of the proposed limits of waste are to be identified. The well is located beneath the newly constructed Cell 2. Based on follow up discussions, the well was abandoned in accordance with the requirements of chapter NR 812, Wis. Adm. Code. However, if the well had been identified, as required, additional requirements for abandonment may have been conditioned. The Department has determined, as part of this review, that no additional actions that would require liner excavation are being required. In the future, please ensure all items required by code are identified for Department review.

The report did not include specific information on the abandonment of the leachate detection device (LS-57). The accompanying plan sheet No. 3 showed LS-57 having been adjacent to the underground leachate tank near the division berm for Cell 2 and 3 located in the southwest corner. Based on follow up discussions, LS-57 was removed in its entirety at the same time as the leachate tank. The Department has determined, as part of this review, that no additional actions are being required.



Cell 1 & 2 liner construction included installation of a gradient control system, sub-base construction (material was hauled into the site to build up the grade elevations), installation of the 2-foot clay layer, installation of the geosynthetic clay liner (GCL) and 60-mil Geomembrane, and placement of the leachate collection system. All components of the liner system were constructed in accordance with applicable chapter NR 504 and 516, Wis. Adm. Code requirements and applicable Department approvals.

Additional construction activities at the site included leachate system components and sedimentation basins. The leachate collection system includes the duel contained force main pipe, manholes, and a 104,600 gallon above ground leachate collection tank with load out facility. The entire system from the farthest manhole to the leachate collection tank was pressure tested with no leaks detected. Three storm water basins were constructed as infiltration basins that will naturally dewater. An emergency spillway was included for overflow conditions. A drop manhole was installed to reduce flow velocities.

Construction was completed and documented in compliance with the approved plan of operation, associated plan of operation modification approvals, and ch. NR 500 through 538, Wis. Adm. Code. You are reminded that approval by the Bureau of Waste & Materials Management does not relieve you of obligations to meet all other applicable federal, state, and local permits, zoning and regulatory requirements.

Sally Hronek is the waste management engineer assigned to this facility. Please feel free to contact her by telephone at 920-662-5493 or email: <u>Sally.Hronek@wi.gov</u> if you have questions regarding this approval.

Sincerely,

Jill Schoen, CHMM

U Schoen

Waste & Materials Management Program Supervisor

West Central Region

cc:

Nathan Coller – DNR Waste Management Hydrogeologist (email)

Joe Lourigan – DNR Waste Management Hydrogeologist (email)

Bob Grefe – DNR Waste Management Engineer (email)

BEFORE THE STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES

CONSTRUCTION DOCUMENTATION APPROVAL FOR THE

CELL 1 & 2 LINER AT THE

WISCONSIN PUBLIC SERVICE CORPORATION WESTON 3 LANDFILL WDNR LICENSE NO. 3067

FINDINGS OF FACT

The Department finds that:

- 1. Wisconsin Public Service Corporation (WPSC) owns and operates a non-hazardous industrial waste facility located in the E ½ of the NW ¼ and the W ½ of the NE ¼ of Section 23, Town 26 North, Range 7 East, in the Town of Knowlton, Marathon County, Wisconsin.
- 2. On October 20, 1986, the Department issued a conditional plan of operation approval for the WPSC Weston Disposal Site No. 3 Landfill also known as the WPSC Legner Landfill. The approval includes 35 acres for WPSC industrial material disposal. Only Phase 1 was built and partially filled before temporarily closing.
- 3. On December 11, 2014, the Department issued a conditional plan of operation approval for the expansion of Weston Disposal Site No. 3. The approval expands the landfill an additional 22.6 acres with updated cell designs and requires exhuming the 1986 approved Phase 1 landfill.
- 4. On August 27, 2015, the Department issued a plan of operation modification approval. The approval addresses a 26-foot relocation of the landfill footprint approved in the Department's August 25, 2015 feasibility modification determination.
- 5. On March 7, 2016, the Department received the construction documentation report and 24 plan sheets from TRC Environmental Corporation, on behalf of WPSC titled, 'Cell 1 and Cell 2 Liner Construction Documentation Report, Wisconsin Public Service Corporation, Weston Disposal Site No. 3, WDNR License No. 3067.' The report is dated March 2, 2016.
 - a. Between April 5, 2016 and April 11, 2016, the Department received additional information pertaining to the construction documentation report, which further detailed the abandonment of CQ997. The Department's review of this information is summarized in a memo to the file dated April 21, 2016 and titled "Well abandonment of non-potable private well located within landfill footprint of Cell 2 of Wisconsin Public Service Corporation (WPSC) landfill Site No. 3 (aka Legner Landfill), Lic. #3067."
 - b. Between April 13, 2016, and April 20, 2016, the Department received additional information pertaining to the construction documentation report, which further detailed the abandonment of LS-57. The Department's review of this information is summarized in a memo to the file dated April 21, 2016, and titled "Investigation and abandonment of

leachate monitoring device LS-57 located within the landfill footprint of Wisconsin Public Service Corporation (WPSC) landfill Site No. 3 (aka Legner Landfill), Lic. #3067."

6. On March 28, 2016, the Department received the correct fee of \$6,050. The fee included the \$1,100 document review fee, \$550 pre-construction meeting fee, and \$4,400 fee for 8 construction inspections. The construction inspections were conducted by the Department in 2015 on July 21, August 17, 24, 26, September 21, October 14, November 16, and December 10.

CONCLUSIONS OF LAW

- 1. The Department has authority under s. 289.31(3), Stats., and ch. NR 516, Wis. Adm. Code, to require that the owner of a solid waste disposal facility demonstrate that the facility has been constructed in substantial compliance with the plan of operation approvals.
- 2. In accordance with the foregoing, the Department has authority under ch. 289, Stats., to issue the following construction documentation approval.

CONSTRUCTION DOCUMENTATION APPROVAL

The Department hereby approves the construction documentation report for the Cell 1 & 2 liner at the WPSC landfill, subject to chs. NR 500 through 538, Wis. Adm. Code.

This approval is based on the information available to the Department as of the date of approval. If additional information, project changes or other circumstances indicate a possible need to modify this approval, the Department may ask you to provide further information relating to this activity. Likewise, the Department accepts proposals to modify approvals, as provided for in state statutes and administrative codes.

NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed.

For judicial review of a decision pursuant to sections 227.52 and 227.53, Stats., you have 30 days after the decision is mailed or otherwise served by the Department, to file your petition with the appropriate Circuit Court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

Dated: April 22, 2016

DEPARTMENT OF NATURAL RESOURCES

For the Secretary

Jill/Schoen, CHMM

Waste & Materials Management Program Supervisor

West Central Region

If for Sally Gronek
Sally Hronek

Waste & Materials Management Engineer

Northeast Region

Attachment C
Construction
Documentation Report
Appendix C – Phase I
Closure Report

Appendix C Phase I Closure Report



Phase 1 Closure Report

Weston Disposal Site No. 3 Town of Knowlton, Wisconsin

March 2016

Prepared For Wisconsin Public Service Corporation

Todd Martin

Senior Project Manager

Todd 41. Martin

Jonathan N. Hotstream, P.E., P.G.

Senior Geological Engineer

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i

1.1 Site Background

Wisconsin Public Service Corporation (WPS) is expanding their existing Weston Disposal Site No. 3 coal combustion residuals (CCR) landfill located in the Town of Knowlton, Marathon County, Wisconsin. Phase 1 of the existing landfill (Phase 1) has a footprint of approximately 4 acres. Phase 1 lies within the footprint of Cell 1, Cell 2, and Cell 3 of the permitted expansion. Refer to the figures and Plan Sheets in the Sampling and Analysis Plan prepared by TRC in June 2015 (TRC 2015). The existing Phase 1 liner system lies above the base grades of the approved expansion liner system; therefore, the clay liner of Phase 1 had to be excavated to construct Cells 1, 2, and 3 of the approved expansion. It is estimated that approximately 2 feet of CCR was placed in Phase 1, or approximately 6,800 CY of CCR, prior to installing a temporary cover. The temporary cover over the CCR in Phase 1 was composed of a geomembrane with approximately 6 inches of cover soil. Phase 1 was constructed with a 1-foot-thick leachate collection drainage layer and a 5-foot-thick compacted clay liner.

1.2 Plan Modification Requirements

On December 11, 2014, WPS received a conditional approval for the expansion of the Weston Disposal Site No. 3 facility from the Wisconsin Department of Natural Resources (WDNR). The planned expansion included constructing a new composite lined landfill and closure of existing Phase 1 by removal of the CCR.

Condition 13 of the WDNR conditional approval for the expansion required that a sampling plan be developed and submitted to the WDNR to document the removal of the CCR from the existing Phase 1 landfill. The sampling plan was to be submitted prior to development of the Phase 1 area to the new liner design elevations. A June 2015 Sampling and Analysis Plan (SAP) was developed and submitted to the WDNR to satisfy Condition 13. The SAP outlined the field, laboratory, and reporting methods that would be implemented to document removal of CCR from Phase 1. The SAP indicated that after sampling and testing was completed, a closure report would be submitted to the WDNR providing laboratory testing results and documentation of the closure of Phase 1. This Phase 1 Closure Report was developed to meet the requirement of the SAP (TRC 2015).

1.3 Construction

The Cell 1 and Cell 2 liners of the approved expansion were constructed in 2015. Cell 1 and Cell 2 of the expansion were constructed in stages, with Cell 1 being constructed prior to constructing Cell 2. Construction of Cell 1 and Cell 2 included excavation and off-site disposal of the Phase 1 temporary cover geomembrane, leachate drainage layer, CCR, and approximately one foot of the top of the existing clay liner. The cover soil above the geomembrane of the temporary cover was salvaged and used as general fill during Cell 1 and Cell 2 construction (refer to the photographs in Attachment 1). It was proposed in the approved Plan of Operation to stockpile the remainder of the excavated clay from the Phase 1 liner for construction of clay liner for the expansion (TRC, 2014). The Phase 1 temporary cover geomembrane, drainage layer, CCR, and top foot of the existing clay liner within the construction limits of Cell 1 was removed and disposed of off-site at the Lincoln County Landfill located in Merrill, Wisconsin. The underlying clay within the footprint of Cell 1 was stockpiled so that construction of Cell 1 could continue. Prior to the construction of Cell 2, the reminder of the Phase 1 temporary cover, CCR, and liner were removed as described above for Cell 1 Construction.

1.4 Field Sampling

The sampling was performed in two stages:

- 1. Initially samples of the existing clay liner and CCR were obtained for characterization of each material.
- 2. Confirmation sampling was performed after removal of the CCR and upper foot of the existing clay liner to document removal of the CCR.

Background characteristic sampling consisted of 10 representative samples of clay liner material and 10 samples of CCR. These grab samples were collected by a hand auger. Decontamination procedures outlined in the June 2015 SAP were followed to prevent cross contamination.

Confirmation sampling occurred after the CCR and top foot of the existing liner had been disposed of off-site as described in Subsection 1.3. Approximately 5 grab samples per acre (20 samples total) were collected and analyzed from the base of the excavation (estimated at 1 foot below top of existing clay liner grades) and compared to the results of background characterization. Sample collection methods and decontamination for confirmatory sampling was equivalent to those used during background characterization sampling.

Samples were containerized and kept on ice for shipment to a certified Wisconsin laboratory [Pace Analytical Services, Incorporated (Pace)]. Chain-of-custody and sampling procedures followed the procedures identified in the June 2015 SAP.

Section 2 Characterization Sample Analysis

In June 2015, TRC developed a Sampling and Analysis Plan (SAP) to document the removal of the coal combustion residuals (CCR) from the existing Phase 1 landfill at the Weston Disposal Site No. 3. The SAP outlined a two phase approach where background samples of the CCR and clay liner would be obtained for characterization analysis. Following the characterization analysis, a refined list of parameters would be selected for the confirmation sampling of the underlying clay liner material to document removal of the CCR.

Background sampling was performed on July 2, 2015 and analytical testing was performed by Pace in Green Bay, Wisconsin. The results of the 10 background samples of CCR and the 10 background samples of clay liner are provided in Table 1. Laboratory test results for the characterization samples are provided in Attachment 4. The background sampling data was evaluated using the Unites States Environmental Protection Agency's Pro-UCL software to determine the 95% upper confidence limit (UCL) for each parameter.

The characterization sample results were compared to determine statistically distinct concentrations between the CCR and clay liner materials. It was determined that the confirmation samples would be analyzed for calcium, lead, and zinc. These parameters were selected based on the ratio of the 95% UCL values between the CCR and clay liner calculated for the characterization data sets. These three constituents are less mobile and therefore provide better definition of CCR from clay liner material. A soil averaging approach using the confirmation samples compared to the 95% UCL of the clay was proposed to document removal of the CCR.

Because of the phasing of construction, the analysis procedures presented in the Sampling and Analysis Plan (SAP) dated June 2015 were revised. The SAP proposed comparing soil averaging from contiguous sample blocks to the 95% upper confidence limit (UCL) of the mean to evaluate the confirmation sampling results. Removal of the CCR in the existing Phase 1 landfill was performed in a phased approach (e.g., in the area of overlap between the existing Phase 1 and Cell 1 of the expansion was removed prior to other remaining portions of Phase 1 during Cell 2 construction). This phased construction approach required that the confirmation sampling results be compared on a sample by sample basis; therefore, a UCL approach for the mean of sample blocks was not appropriate. Instead a tolerance limit approach was used to allow individual point observations to be evaluated.

Section 3 Confirmation Sample Analysis

As determined in the characterization analysis, the confirmation samples were analyzed for calcium, lead, and zinc. Upper 95% tolerance limits for the three parameters were calculated for the background liner material using one-sided tolerance factors (refer to Table 2). The results of the confirmation samples were evaluated against 3 criteria to verify that the CCR had been removed. The 3 criteria were:

- Below the tolerance limit for lead (8.9 mg/kg) based on the characterization results on clay
- Below the tolerance limit for zinc (83.2 mg/kg) based on the characterization results on clay
- A zinc concentration to lead concentration ratio greater than 4.8

The parameters lead and zinc show the largest differences between the CCR and background clay datasets. The lead data provides clear separation between the two populations. The zinc data shows some overlap in the two data sets. The ratio of the zinc/lead concentrations in the characterization datasets provides a consistent separation between the two data sets where the CCR ratios range between 2.4 and 3.5 and the clay ratios range between 4.8 and 17.8. Refer to Attachment 2 containing the zinc to lead ratios and the tolerance limit calculations. This ratio data suggests a unique identifier between the two materials. Due to the overlap in the zinc data sets and the short spacing in the zinc to lead concentration ratios meeting two out of three acceptance criteria was considered appropriate.

The calcium concentration of the confirmation samples was evaluated on a qualitative standpoint, but not considered in the formal evaluation. The mean and standard deviation of the calcium concentration for the characterization dataset are 23,534 mg/kg and 30,438 mg/kg, respectively. This indicates that the calcium concentration of the CCR is extremely variable. The characterization data for calcium from the clay result in an average of 1,716 mg/kg with a standard deviation of 280 mg/kg. Calcium functions as a good marker for distinguishing clay from CCR when using soil averaging, but is ambiguous in evaluating individual samples.

Therefore, a confirmation sample that achieved two out of three of these criteria was considered sufficient to document removal of CCR in the vicinity of that sample.

Confirmation sampling was performed on July 30, August 26, August 27, and September 16, 2015. The 20 confirmation sample locations which were collected at an approximate frequency of 5 samples per acre are presented on Figure 1 in Attachment 3. Table 2 contains a summary of the confirmation sample analysis results, and laboratory analysis reports are provided in

Attachment 4. The confirmation sample results indicated that all the individual 20 confirmation samples met the 3 acceptance criteria listed above for the tolerance limit approach. This analysis demonstrates that the CCR in the existing Phase 1 landfill was removed as required per condition 13 of the WDNR expansion approval.

Due to the construction sequencing and time constraints, the clay liner material from the existing Phase 1 landfill was excavated and stockpiled on-site for future construction events. The stockpile was covered with a soil cover and seeded to control erosion. At this time, it is anticipated that this stockpiled material will be used as the compacted clay component below the geomembrane in future final cover construction.

Section 4 References

TRC. 2014. Weston Disposal Site No. 3 Expansion: Plan of Operation. March 2014.

TRC. 2015. Sampling and Analysis Plan for Weston Disposal Site No. 3, Phase 1 Closure, Town of Knowlton, Wisconsin. June 2015.

Table 1

Characterization Sample Analysis Results and 95 percent Upper Confidence Limits for Each Parameter Phase 1 Closure Report Wisconsin Public Service Corporation – Weston Disposal Site No. 3

SAMPLE NAME	ARSENIC (mg/kg)	BERYLLIUM (mg/kg)	BORON (mg/kg)	CALCIUM (mg/kg)	CHROMIUM (mg/kg)	COPPER (mg/kg)	LEAD (mg/kg)	MOLYBDENUM (mg/kg)	SULFUR (mg/kg)	ZINC (mg/kg)
Analytical T	esting on Coa	al Combustio	n Residuals	(CCR)						
FA-1	29.5	6.3	70	2,670	27.1	70.5	80.7	4.7	261	196
FA-2	35.2	10.6	99.7	2,080	36.7	88.4	113	2.4	33.6	273
FA-3	35.8	9.5	105	2,400	34.5	100	107	3.4	182	261
FA-4	14.3	3	151	73,400	26.5	71.1	24.4	2.8	783	84.5
FA-5	10.6 J	2.5	200	10,300	26.2	73.7	19.2	2.7	721	48
FA-6	27.4	6	154	32,900	30.8	74.3	66.3	2.7	724	193
FA-7	41.6	8.5	116	5,890	39.9	108	106	2.4 J	428	330
FA-8	6.1 J	2.1	215	11,700	25.5	70.6	10	2.5	749	25.6
FA-9	16.4	2.8	305	10,300	32.3	77.1	21.4	2.8	2,170	58.8
FA-10	19.6	3.7	199	83,700	32.3	77.8	38.5	2.7	907	97.5
95% UCL	30.6	7.3	202.0	63,262	34.0	89.1	82.3	3.3	1,041	219.2
Analytical T	esting on Cla	y Liner Mater	ial							
CL-1	< 3.8	0.98	133	1,370	94.3	58.8	2.7 J	< .26	38.1	48.1
CL-2	< 3.9	0.63	176	1,650	85.5	22.4	3.0 J	< .26	21.3 J	30.3
CL-3	7 J	1.1	103	1,210	106	67.7	4.9 J	.49 J	27.7	83.2
CL-4	6.1 J	0.73	144	2,180	137	29.7	4.2 J	.42 J	47.5	27.3
CL-5	4.5 J	0.75	142	1,970	82.7	31.8	7.1	< .26	34.1	34.1
CL-6	5.6 J	0.66	128	1,910	84.2	29.3	5.9	< .23	28.1 J	36.3
CL-7	6.4 J	0.76	131	1,760	75.1	34.6	5.9	< .25	37.8	37.5
CL-8	7.7 J	0.69	150	1,660	56.7	31.3	4.9 J	< .27	16.5 J	34.4
CL-9	< 3.4	0.66	109	1,690	60	41.9	6	< .26	36.1	34.7
CL-10	6.4 J	0.76	106	1,760	81.1	46.7	3.5 J	< .25	16 J	36.8
95% UCL	6.3	0.86	145.3	1,878	99.6	47.8	5.6	0.35	36.3	50.2

Notes:

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

Created by: M. Williams Checked by: J. Hotstream

Table 2 Confirmation Sample Analysis Results and Evaluation Phase I Closure Report

Wisconsin Public Service Corporation – Weston Disposal Site No. 3

SAMPLE NAME	CALCIUM (mg/kg)	LEAD (mg/kg)	ZINC (mg/kg)	ZINC/LEAD	MEETS CCR REMOVAL CRITERIA
1	1,820	5.3 JB	33.4	6.3	Yes (3/3)
2	1,630	5.0	31.3	6.3	Yes (3/3)
3	1,430	6.3	41.9	6.7	Yes (3/3)
4	1,620	5.2	39.0	7.5	Yes (3/3)
5	2,140	<2.5 D3	36.7	14.7	Yes (3/3)
6	1,350	3.5 J,B,D3	40.1	11.5	Yes (3/3)
7	2,040	2.5 J,B,D3	40.4	16.2	Yes (3/3)
8	2,410	4.3	29.1	6.8	Yes (3/3)
9	1,950	6.9	47.3	6.9	Yes (3/3)
10	1,900	1.1 J	15.4	14	Yes (3/3)
11	1,570	3.0 J,B,D3	55.3	18.4	Yes (3/3)
12	2,490	4.6	62.0	13.5	Yes (3/3)
13	1,930	2.3 J,B,D3	64.6	28.1	Yes (3/3)
14	1,850	5.2	43.9	8.4	Yes (3/3)
15	1,430	5.6	38.0	6.8	Yes (3/3)
16	1,820	5.2	32.4	6.2	Yes (3/3)
17	2,600	4.1	36.2	8.8	Yes (3/3)
18	1,880	4.0	56.0	14	Yes (3/3)
19	1,470	3.7	29.1	7.9	Yes (3/3)
20	1,530	7.3	35.7	4.9	Yes (3/3)
Average Confirmation Values	1,843	4	40		Yes (3/3)
Upper 95% Tolerance Limit	2,531	8.9	83.2		

Notes:

B = analyte was detected in the associated method blank.

D3 = sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

Created by: J. Hotstream Checked by: K. Pawlisch

J = estimated concentration at or above the LOD and below the LOQ.

Attachment 1 Photographs



Photographic Log

Client Name:

Wisconsin Public Service Corporation

Site Location:

Weston Disposal Site No. 3 Phase 1 Closure **Project No.:**

218938.0000 Phase 6

Photo No.

Date
August 27, 2015

Description

Removing and salvaging Phase 1 cover soil above the geomembrane of the temporary cover. Salvaged cover soil was used as general fill in Cell 1 and Cell 2 construction.



Photo No.	Date
2	August 27, 20

Description

Removing Phase 1 temporary geomembrane, drainage layer, CCR and top 1-foot-thickness of clay liner for transport and disposal. These materials were disposed of at the Lincoln County Landfill in Merrill, Wisconsin





Photographic Log

Client Name:

Wisconsin Public Service Corporation

Site Location: Weston Disposal Site No. 3

Phase 1 Closure

Project No.:

218938.0000 Phase 6

Photo No.

Date

3

August 27, 2015

Description

Photo looking south to leachate tank. CCR excavated with existing clay liner exposed.



Photo No.

4

Date September 10, 2015

Description

Exposed Clay Liner after CCR was removed.



Attachment 2 Tolerance Limit Evaluation



PROJECT / LOCATION: WPS Weston Disposal Site No. 3 Existing Phase 1 Lar	PROJECT / PROPOSAL NO.			
SUBJECT: Tolerance Limit Calculations			218938.0000 Phase 6	
PREPARED BY: J. Hotstream	DATE: 8/7/2015	FINAL		
CHECKED BY: R. Wienkes	DATE: 8/10/2015	REVISION		

<u>Purpose:</u> Calculate tolerance limits for the characterization samples collected in the clay for comparison to the single point observations of the confirmation samples .

<u>Method:</u> the upper tolerance limits are calculated using the procedures outlined in "Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities: Unified Guidance" by the US EPA (2009).

$$TL = \bar{x} + k(n, \gamma, 1 - \alpha) \cdot s \qquad \text{Eq. 17.16}$$
 where $\ddot{x} = \text{the mean}$ $s = \text{standard deviation}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) = \text{one-sided normal tolerance factor, lookup parameter}$ $k(n, \gamma, 1 - \alpha) =$

When zinc was analyzed using the ProUCL software by the EPA to estimate the 95% upper confidence limit, a non-parametric distribution was determined. The EPA guidance used for this tolerance limit analysis recommends that the tolerance limit for a non-parametric dataset be the maximum value observed in the dataset. Therefore a tolerance limit of 83.2 mg/kg will be used for zinc which represents a coverage of 0.741 based on Table 17-4 in Appendix D of the guidance document. Use the tolerance limits calculated for calcium and lead above.

Guidance Document:

U.S. Environmental Protection Agency. Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities: Unified Guidance. Office of Resource Conservation and Recovery Program Implementation and Information Division. EPA 530-R-09-007. March 2009.



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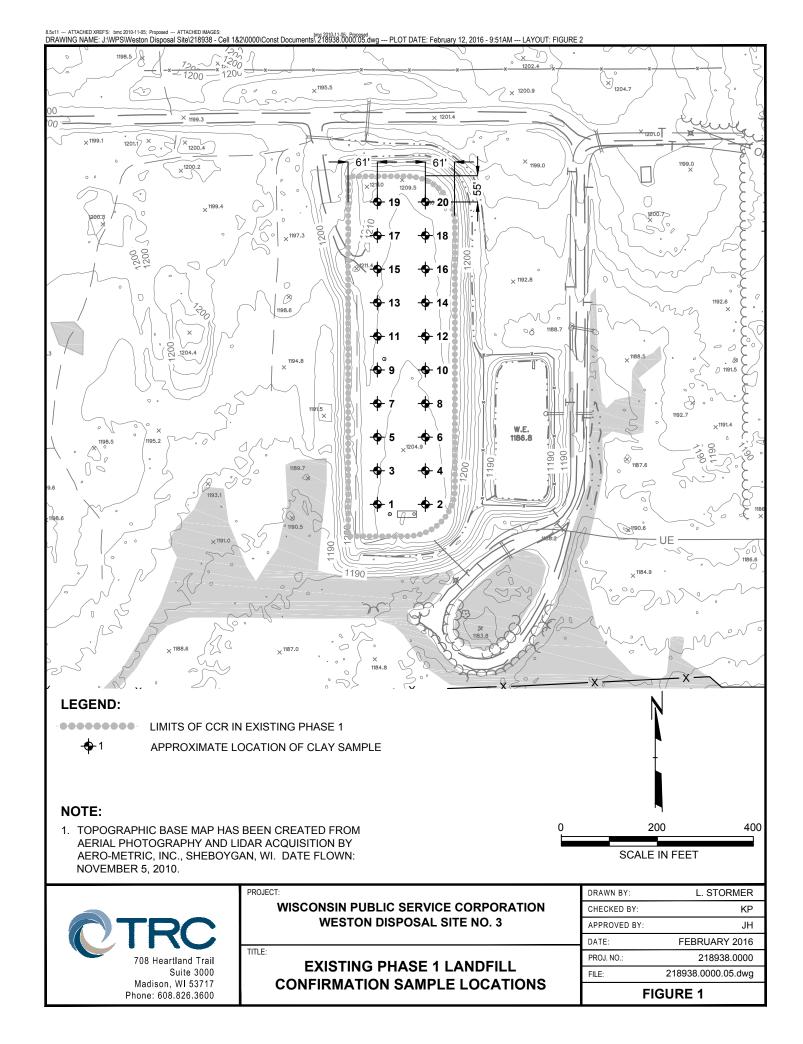
PROJECT / LOCATION: WPS – Weston Disposal Site No. 3		PROJECT / PROPOSAL NO.
SUBJECT: Analytical Results Summary, Background Sampling at Existing Phase 1		218938.0000 Phase 6
PREPARED BY: M. Williams	DATE: 7/22/2015	FINAL
CHECKED BY: J. Hotstream	DATE: 8/7/2015	REVISION

SAMPLE NAME	ARSENIC (mg/kg)	BERYLLIUM (mg/kg)	BORON (mg/kg)	CALCIUM (mg/kg)	CHROMIUM (mg/kg)	COPPER (mg/kg)	LEAD (mg/kg)	MOLYBDENUM (mg/kg)	SULFUR (mg/kg)	ZINC (mg/kg)	ZINC/ LEAD
Analytical Testing on Coal Combustion Residuals (CCR)											
FA-1	29.5	6.3	70	2670	27.1	70.5	80.7	4.7	261	196	2.4
FA-2	35.2	10.6	99.7	2080	36.7	88.4	113	2.4	33.6	273	2.4
FA-3	35.8	9.5	105	2400	34.5	100	107	3.4	182	261	2.4
FA-4	14.3	3	151	73400	26.5	71.1	24.4	2.8	783	84.5	3.5
FA-5	10.6 J	2.5	200	10300	26.2	73.7	19.2	2.7	721	48	2.5
FA-6	27.4	6	154	32900	30.8	74.3	66.3	2.7	724	193	2.9
FA-7	41.6	8.5	116	5890	39.9	108	106	2.4 J	428	330	3.1
FA-8	6.1 J	2.1	215	11700	25.5	70.6	10	2.5	749	25.6	2.6
FA-9	16.4	2.8	305	10300	32.3	77.1	21.4	2.8	2170	58.8	2.7
FA-10	19.6	3.7	199	83700	32.3	77.8	38.5	2.7	907	97.5	2.5
Average	23.7	5.5	161.5	23534	31.2	81.2	58.7	2.9	695.9	156.7	2.7
Maximum	41.6	10.6	305.0	83700	39.9	108.0	113.0	4.7	2170.0	330.0	3.5
Minimum	6.1	2.1	70.0	2080	25.5	70.5	10.0	2.4	33.6	25.6	2.4
Std. Dev.	12.0	3.1	69.9	30437.8	4.9	13.3	40.8	0.7	595.6	107.8	0.4
95% UCL	30.6	7.3	202.0	63262	34.0	88.8	82.3	3.3	1041.0	219.2	
Analytical Tes	ting on Cla	ay Liner Mat	erial								
CL-1	< 3.8	0.98	133	1370	94.3	58.8	2.7 J	< .26	38.1	48.1	17.8
CL-2	< 3.9	0.63	176	1650	85.5	22.4	3.0 J	< .26	21.3 J	30.3	10.1
CL-3	7 J	1.1	103	1210	106	67.7	4.9 J	.49 J	27.7	83.2	17.0
CL-4	6.1 J	0.73	144	2180	137	29.7	4.2 J	.42 J	47.5	27.3	6.5
CL-5	4.5 J	0.75	142	1970	82.7	31.8	7.1	< .26	34.1	34.1	4.8
CL-6	5.6 J	0.66	128	1910	84.2	29.3	5.9	< .23	28.1 J	36.3	6.2
CL-7	6.4 J	0.76	131	1760	75.1	34.6	5.9	< .25	37.8	37.5	6.4
CL-8	7.7 J	0.69	150	1660	56.7	31.3	4.9 J	< .27	16.5 J	34.4	7.0
CL-9	< 3.4	0.66	109	1690	60	41.9	6	< .26	36.1	34.7	5.8
CL-10	6.4 J	0.76	106	1760	81.1	46.7	3.5 J	< .25	16 J	36.8	10.5
Average	5.5	0.77	132	1716	86.3	39.4	4.8	0.30	30.3	40.3	9.2
Maximum	7.7	1.10	176	2180	137.0	67.7	7.1	0.49	47.5	83.2	17.8
Minimum	< 3.9	0.63	103	1210	56.7	22.4	2.7	< 0.27	16.0	27.3	4.8
Std. Dev.	1.5	0.2	22.5	279.9	23.0	14.4	1.4	0.1	10.3	16.0	4.7
95% UCL	6.3	0.9	145.3	1,878	99.6	47.8	5.6	0.4	36.3	50.2	

Notes:

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

Attachment 3 Existing Phase 1 Landfill Confirmation Sample Locations Figure



Attachment 4 Analytical Laboratory Test Results



(920)469-2436



July 22, 2015

Jonathan Hotstream TRC - Madison 708 Heartland Trail Madison, WI 53717

RE: Project: 218938.0006 WESTON DISPOSAL

Pace Project No.: 40117728

Dear Jonathan Hotstream:

Enclosed are the analytical results for sample(s) received by the laboratory on July 07, 2015. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI 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 nolteneya

tod.noltemeyer@pacelabs.com

Project Manager

Enclosures





1241 Bellevue Street - Suite 9 Green Bay, WI 54302 (920)469-2436



CERTIFICATIONS

Project: 218938.0006 WESTON DISPOSAL

Pace Project No.: 40117728

Minnesota Certification IDs

1700 Elm Street SE Suite 200, Minneapolis, MN 55414

A2LA Certification #: 2926.01 Alaska Certification #: UST-078 Alaska Certification #MN00064 Alabama Certification #40770 Arizona Certification #: AZ-0014 Arkansas Certification #: 88-0680 California Certification #: 01155CA Colorado Certification #Pace Connecticut Certification #: PH-0256

EPA Region 8 Certification #: 8TMS-L Florida/NELAP Certification #: E87605

Guam Certification #:14-008r Georgia Certification #: 959 Georgia EPD #: Pace

Idaho Certification #: MN00064 Hawaii Certification #MN00064 Illinois Certification #: 200011 Indiana Certification#C-MN-01 Iowa Certification #: 368

Kansas Certification #: E-10167 Kentucky Dept of Envi. Protection - DW #90062 Kentucky Dept of Envi. Protection - WW #:90062

Louisiana DEQ Certification #: 3086 Louisiana DHH #: LA140001 Maine Certification #: 2013011 Maryland Certification #: 322

Michigan DEPH Certification #: 9909

Minnesota Certification #: 027-053-137 Mississippi Certification #: Pace Montana Certification #: MT0092

Nevada Certification #: MN_00064 Nebraska Certification #: Pace New Jersey Certification #: MN-002 New York Certification #: 11647 North Carolina Certification #: 530

North Carolina State Public Health #: 27700

North Dakota Certification #: R-036

Ohio EPA #: 4150 Ohio VAP Certification #: CL101 Oklahoma Certification #: 9507 Oregon Certification #: MN200001 Oregon Certification #: MN300001 Pennsylvania Certification #: 68-00563

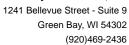
Puerto Rico Certification Saipan (CNMI) #:MP0003 South Carolina #:74003001 Texas Certification #: T104704192 Tennessee Certification #: 02818 Utah Certification #: MN000642013-4 Virginia DGS Certification #: 251 Virginia/VELAP Certification #: Pace Washington Certification #: C486 West Virginia Certification #: 382 West Virginia DHHR #:9952C

Wisconsin Certification #: 999407970

Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302 Florida/NELAP Certification #: E87948 Illinois Certification #: 200050 Kentucky Certification #: 82 Louisiana Certification #: 04168 Minnesota Certification #: 055-999-334

North Dakota Certification #: R-150 South Carolina Certification #: 83006001 Texas Certification #: T104704529-14-1 US Dept of Agriculture #: S-76505 Wisconsin Certification #: 405132750



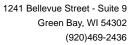


SAMPLE SUMMARY

Project: 218938.0006 WESTON DISPOSAL

Pace Project No.: 40117728

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40117728001	FA-1	Solid	07/02/15 08:00	07/07/15 09:50
40117728002	FA-2	Solid	07/02/15 08:10	07/07/15 09:50
40117728003	FA-3	Solid	07/02/15 08:20	07/07/15 09:50
40117728004	FA-4	Solid	07/02/15 08:30	07/07/15 09:50
40117728005	FA-5	Solid	07/02/15 08:40	07/07/15 09:50
40117728006	FA-6	Solid	07/02/15 08:50	07/07/15 09:50
40117728007	FA-7	Solid	07/02/15 09:00	07/07/15 09:50
40117728008	FA-8	Solid	07/02/15 09:10	07/07/15 09:50
40117728009	FA-9	Solid	07/02/15 09:20	07/07/15 09:50
40117728010	FA-10	Solid	07/02/15 09:30	07/07/15 09:50





SAMPLE ANALYTE COUNT

Project: 218938.0006 WESTON DISPOSAL

Pace Project No.: 40117728

₋ab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
10117728001	FA-1	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	SKW	1	PASI-G
10117728002	FA-2	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	SKW	1	PASI-G
10117728003	FA-3	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	SKW	1	PASI-G
10117728004	FA-4	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	KEW	1	PASI-G
10117728005	FA-5	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	KEW	1	PASI-G
10117728006	FA-6	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	KEW	1	PASI-G
10117728007	FA-7	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	KEW	1	PASI-G
10117728008	FA-8	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	KEW	1	PASI-G
10117728009	FA-9	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	KEW	1	PASI-G
10117728010	FA-10	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	KEW	1	PASI-G

1241 Bellevue Street - Suite 9 Green Bay, WI 54302 (920)469-2436

PROJECT NARRATIVE

Project: 218938.0006 WESTON DISPOSAL

Pace Project No.: 40117728

 Method:
 EPA 6010

 Description:
 6010 MET ICP

 Client:
 TRC - MADISON

 Date:
 July 22, 2015

General Information:

10 samples were analyzed for EPA 6010. 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 3050 with any exceptions noted below.

The samples were prepared in accordance with EPA 3050 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.

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: MPRP/55948

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 40117731001

R1: RPD value was outside control limits.

- MSD (Lab ID: 2018655)
 - Sulfur

Additional Comments:

Analyte Comments:

QC Batch: MPRP/12239

D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

- FA-5 (Lab ID: 40117728005)
 - Arsenic
- FA-8 (Lab ID: 40117728008)
 - Arsenic

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

(920)469-2436



ANALYTICAL RESULTS

Project: 218938.0006 WESTON DISPOSAL

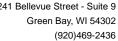
Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

Sample: FA-1 Lab ID: 40117728001 Collected: 07/02/15 08:00 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	29.5	mg/kg	2.6	0.81	1	07/15/15 12:47	07/16/15 17:52	7440-38-2	
Sulfur	261	mg/kg	25.0	1.8	1	07/13/15 23:29	07/16/15 12:05		
Beryllium	6.3	mg/kg	0.51	0.048	1	07/15/15 12:47	07/16/15 17:52	7440-41-7	
Boron	70.0	mg/kg	12.8	0.40	1	07/15/15 12:47	07/16/15 17:52	7440-42-8	
Calcium	2670	mg/kg	128	3.5	1	07/15/15 12:47	07/16/15 17:52	7440-70-2	
Chromium	27.1	mg/kg	0.64	0.25	1	07/15/15 12:47	07/16/15 17:52	7440-47-3	
Copper	70.5	mg/kg	1.3	0.20	1	07/15/15 12:47	07/16/15 17:52	7440-50-8	
Lead	80.7	mg/kg	1.3	0.55	1	07/15/15 12:47	07/16/15 17:52	7439-92-1	
Molybdenum	4.7	mg/kg	2.6	0.27	1	07/15/15 12:47	07/16/15 17:52	7439-98-7	
Zinc	196	mg/kg	5.1	0.49	1	07/15/15 12:47	07/16/15 17:52	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	21.8	%	0.10	0.10	1		07/08/15 14:50		





Project: 218938.0006 WESTON DISPOSAL

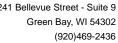
Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

Sample: FA-2 Lab ID: 40117728002 Collected: 07/02/15 08:10 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Sulfur	33.6	mg/kg	25.7	1.8	1	07/13/15 23:29	07/16/15 12:08		
Arsenic	35.2	mg/kg	2.7	0.86	1	07/15/15 12:47	07/16/15 17:55	7440-38-2	
Beryllium	10.6	mg/kg	0.54	0.051	1	07/15/15 12:47	07/16/15 17:55	7440-41-7	
Boron	99.7	mg/kg	13.5	0.42	1	07/15/15 12:47	07/16/15 17:55	7440-42-8	
Calcium	2080	mg/kg	135	3.7	1	07/15/15 12:47	07/16/15 17:55	7440-70-2	
Chromium	36.7	mg/kg	0.67	0.26	1	07/15/15 12:47	07/16/15 17:55	7440-47-3	
Copper	88.4	mg/kg	1.3	0.21	1	07/15/15 12:47	07/16/15 17:55	7440-50-8	
Lead	113	mg/kg	1.3	0.58	1	07/15/15 12:47	07/16/15 17:55	7439-92-1	
Molybdenum	2.4J	mg/kg	2.7	0.29	1	07/15/15 12:47	07/16/15 17:55	7439-98-7	
Zinc	273	mg/kg	5.4	0.52	1	07/15/15 12:47	07/16/15 17:55	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	28.0	%	0.10	0.10	1		07/08/15 14:50		





Project: 218938.0006 WESTON DISPOSAL

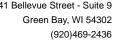
Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

Sample: FA-3 Lab ID: 40117728003 Collected: 07/02/15 08:20 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EPA	A 3050			
Sulfur	182	mg/kg	25.1	1.8	1	07/13/15 23:29	07/16/15 12:11		
Arsenic	35.8	mg/kg	2.6	0.83	1	07/15/15 12:47	07/16/15 17:57	7440-38-2	
Beryllium	9.5	mg/kg	0.52	0.049	1	07/15/15 12:47	07/16/15 17:57	7440-41-7	
Boron	105	mg/kg	13.0	0.41	1	07/15/15 12:47	07/16/15 17:57	7440-42-8	
Calcium	2400	mg/kg	130	3.6	1	07/15/15 12:47	07/16/15 17:57	7440-70-2	
Chromium	34.5	mg/kg	0.65	0.25	1	07/15/15 12:47	07/16/15 17:57	7440-47-3	
Copper	100	mg/kg	1.3	0.20	1	07/15/15 12:47	07/16/15 17:57	7440-50-8	
Lead	107	mg/kg	1.3	0.56	1	07/15/15 12:47	07/16/15 17:57	7439-92-1	
Molybdenum	3.4	mg/kg	2.6	0.28	1	07/15/15 12:47	07/16/15 17:57	7439-98-7	
Zinc	261	mg/kg	5.2	0.50	1	07/15/15 12:47	07/16/15 17:57	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	28.5	%	0.10	0.10	1		07/08/15 14:50		





Project: 218938.0006 WESTON DISPOSAL

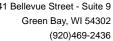
Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

Sample: FA-4 Lab ID: 40117728004 Collected: 07/02/15 08:30 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Sulfur	783	mg/kg	28.1	2.0	1	07/13/15 23:29	07/16/15 12:14		
Arsenic	14.3	mg/kg	4.6	1.5	2	07/15/15 12:47	07/17/15 10:41	7440-38-2	
Beryllium	3.0	mg/kg	0.46	0.043	1	07/15/15 12:47	07/16/15 17:39	7440-41-7	
Boron	151	mg/kg	11.5	0.36	1	07/15/15 12:47	07/16/15 17:39	7440-42-8	
Calcium	73400	mg/kg	231	6.3	2	07/15/15 12:47	07/17/15 10:41	7440-70-2	P6
Chromium	26.5	mg/kg	1.2	0.45	2	07/15/15 12:47	07/17/15 10:41	7440-47-3	
Copper	71.1	mg/kg	1.2	0.18	1	07/15/15 12:47	07/16/15 17:39	7440-50-8	
Lead	24.4	mg/kg	2.3	0.99	2	07/15/15 12:47	07/17/15 10:41	7439-92-1	
Molybdenum	2.8	mg/kg	2.3	0.25	1	07/15/15 12:47	07/16/15 17:39	7439-98-7	
Zinc	84.5	mg/kg	4.6	0.44	1	07/15/15 12:47	07/16/15 17:39	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	13.5	%	0.10	0.10	1		07/10/15 10:51		





Project: 218938.0006 WESTON DISPOSAL

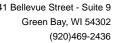
Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

Sample: FA-5 Lab ID: 40117728005 Collected: 07/02/15 08:40 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Sulfur	721	mg/kg	23.3	1.7	1	07/13/15 23:29	07/16/15 12:29		
Arsenic	10.6J	mg/kg	10.7	3.4	5	07/15/15 12:47	07/17/15 10:47	7440-38-2	D3
Beryllium	2.5	mg/kg	0.43	0.040	1	07/15/15 12:47	07/16/15 17:59	7440-41-7	
Boron	200	mg/kg	10.7	0.34	1	07/15/15 12:47	07/16/15 17:59	7440-42-8	
Calcium	103000	mg/kg	537	14.7	5	07/15/15 12:47	07/17/15 10:47	7440-70-2	
Chromium	26.2	mg/kg	2.7	1.0	5	07/15/15 12:47	07/17/15 10:47	7440-47-3	
Copper	73.7	mg/kg	1.1	0.17	1	07/15/15 12:47	07/16/15 17:59	7440-50-8	
Lead	19.2	mg/kg	5.4	2.3	5	07/15/15 12:47	07/17/15 10:47	7439-92-1	
Molybdenum	2.7	mg/kg	2.1	0.23	1	07/15/15 12:47	07/16/15 17:59	7439-98-7	
Zinc	48.0	mg/kg	4.3	0.41	1	07/15/15 12:47	07/16/15 17:59	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	8.9	%	0.10	0.10	1		07/10/15 10:52		





Project: 218938.0006 WESTON DISPOSAL

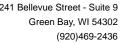
Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

Sample: FA-6 Lab ID: 40117728006 Collected: 07/02/15 08:50 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Sulfur	724	mg/kg	33.0	2.4	1	07/13/15 23:29	07/16/15 12:32		
Arsenic	27.4	mg/kg	2.5	0.78	1	07/15/15 12:47	07/16/15 18:02	7440-38-2	
Beryllium	6.0	mg/kg	0.49	0.046	1	07/15/15 12:47	07/16/15 18:02	7440-41-7	
Boron	154	mg/kg	12.3	0.38	1	07/15/15 12:47	07/16/15 18:02	7440-42-8	
Calcium	32900	mg/kg	123	3.4	1	07/15/15 12:47	07/16/15 18:02	7440-70-2	
Chromium	30.8	mg/kg	0.61	0.24	1	07/15/15 12:47	07/16/15 18:02	7440-47-3	
Copper	74.3	mg/kg	1.2	0.19	1	07/15/15 12:47	07/16/15 18:02	7440-50-8	
Lead	66.3	mg/kg	1.2	0.53	1	07/15/15 12:47	07/16/15 18:02	7439-92-1	
Molybdenum	2.7	mg/kg	2.5	0.26	1	07/15/15 12:47	07/16/15 18:02	7439-98-7	
Zinc	193	mg/kg	4.9	0.47	1	07/15/15 12:47	07/16/15 18:02	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	25.7	%	0.10	0.10	1		07/10/15 10:52		





Project: 218938.0006 WESTON DISPOSAL

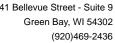
Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

Sample: FA-7 Lab ID: 40117728007 Collected: 07/02/15 09:00 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Sulfur	428	mg/kg	23.2	1.7	1	07/13/15 23:29	07/16/15 12:35		
Arsenic	41.6	mg/kg	2.5	0.80	1	07/15/15 12:47	07/16/15 18:04	7440-38-2	
Beryllium	8.5	mg/kg	0.51	0.047	1	07/15/15 12:47	07/16/15 18:04	7440-41-7	
Boron	116	mg/kg	12.6	0.39	1	07/15/15 12:47	07/16/15 18:04	7440-42-8	
Calcium	5890	mg/kg	126	3.5	1	07/15/15 12:47	07/16/15 18:04	7440-70-2	
Chromium	39.9	mg/kg	0.63	0.24	1	07/15/15 12:47	07/16/15 18:04	7440-47-3	
Copper	108	mg/kg	1.3	0.20	1	07/15/15 12:47	07/16/15 18:04	7440-50-8	
Lead	106	mg/kg	1.3	0.54	1	07/15/15 12:47	07/16/15 18:04	7439-92-1	
Molybdenum	2.4J	mg/kg	2.5	0.27	1	07/15/15 12:47	07/16/15 18:04	7439-98-7	
Zinc	330	mg/kg	5.1	0.49	1	07/15/15 12:47	07/16/15 18:04	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	28.0	%	0.10	0.10	1		07/10/15 10:52		





Project: 218938.0006 WESTON DISPOSAL

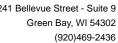
Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

Sample: FA-8 Lab ID: 40117728008 Collected: 07/02/15 09:10 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Sulfur	749	mg/kg	24.6	1.8	1	07/13/15 23:29	07/16/15 12:38		
Arsenic	6.1J	mg/kg	10.1	3.2	5	07/15/15 12:47	07/17/15 10:50	7440-38-2	D3
Beryllium	2.1	mg/kg	0.40	0.038	1	07/15/15 12:47	07/16/15 18:06	7440-41-7	
Boron	215	mg/kg	10.1	0.31	1	07/15/15 12:47	07/16/15 18:06	7440-42-8	
Calcium	117000	mg/kg	503	13.8	5	07/15/15 12:47	07/17/15 10:50	7440-70-2	
Chromium	25.5	mg/kg	2.5	0.98	5	07/15/15 12:47	07/17/15 10:50	7440-47-3	
Copper	70.6	mg/kg	1.0	0.16	1	07/15/15 12:47	07/16/15 18:06	7440-50-8	
Lead	10	mg/kg	5.0	2.2	5	07/15/15 12:47	07/17/15 10:50	7439-92-1	
Molybdenum	2.5	mg/kg	2.0	0.21	1	07/15/15 12:47	07/16/15 18:06	7439-98-7	
Zinc	25.6	mg/kg	4.0	0.39	1	07/15/15 12:47	07/16/15 18:06	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	8.6	%	0.10	0.10	1		07/10/15 10:52		





Project: 218938.0006 WESTON DISPOSAL

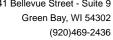
Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

Sample: FA-9 Lab ID: 40117728009 Collected: 07/02/15 09:20 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Sulfur	2170	mg/kg	23.7	1.7	1	07/13/15 23:29	07/16/15 12:42		
Arsenic	16.4	mg/kg	11.1	3.5	5	07/15/15 12:47	07/17/15 10:52	7440-38-2	
Beryllium	2.8	mg/kg	0.44	0.042	1	07/15/15 12:47	07/16/15 18:09	7440-41-7	
Boron	305	mg/kg	11.1	0.35	1	07/15/15 12:47	07/16/15 18:09	7440-42-8	
Calcium	103000	mg/kg	553	15.1	5	07/15/15 12:47	07/17/15 10:52	7440-70-2	
Chromium	32.3	mg/kg	2.8	1.1	5	07/15/15 12:47	07/17/15 10:52	7440-47-3	
Copper	77.1	mg/kg	1.1	0.17	1	07/15/15 12:47	07/16/15 18:09	7440-50-8	
Lead	21.4	mg/kg	5.5	2.4	5	07/15/15 12:47	07/17/15 10:52	7439-92-1	
Molybdenum	2.8	mg/kg	2.2	0.24	1	07/15/15 12:47	07/16/15 18:09	7439-98-7	
Zinc	58.8	mg/kg	4.4	0.43	1	07/15/15 12:47	07/16/15 18:09	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	17.1	%	0.10	0.10	1		07/10/15 10:52		





Project: 218938.0006 WESTON DISPOSAL

Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

Sample: FA-10 Lab ID: 40117728010 Collected: 07/02/15 09:30 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	\ 6010 Prepar	ation Metho	od: EP	A 3050			
Sulfur	907	mg/kg	22.1	1.6	1	07/13/15 23:29	07/16/15 12:45		
Arsenic	19.6	mg/kg	10.9	3.5	5	07/15/15 12:47	07/17/15 10:54	7440-38-2	
Beryllium	3.7	mg/kg	0.43	0.041	1	07/15/15 12:47	07/16/15 18:17	7440-41-7	
Boron	199	mg/kg	10.9	0.34	1	07/15/15 12:47	07/16/15 18:17	7440-42-8	
Calcium	83700	mg/kg	543	14.9	5	07/15/15 12:47	07/17/15 10:54	7440-70-2	
Chromium	32.3	mg/kg	2.7	1.1	5	07/15/15 12:47	07/17/15 10:54	7440-47-3	
Copper	77.8	mg/kg	1.1	0.17	1	07/15/15 12:47	07/16/15 18:17	7440-50-8	
Lead	38.5	mg/kg	5.4	2.3	5	07/15/15 12:47	07/17/15 10:54	7439-92-1	
Molybdenum	2.7	mg/kg	2.2	0.23	1	07/15/15 12:47	07/16/15 18:17	7439-98-7	
Zinc	97.5	mg/kg	4.3	0.42	1	07/15/15 12:47	07/16/15 18:17	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	18.2	%	0.10	0.10	1		07/10/15 10:52		



QUALITY CONTROL DATA

Project: 218938.0006 WESTON DISPOSAL

Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

QC Batch: MPRP/12239 Analysis Method: EPA 6010
QC Batch Method: EPA 3050 Analysis Description: 6010 MET

Associated Lab Samples: 40117728001, 40117728002, 40117728003, 40117728004, 40117728005, 40117728006, 40117728007,

40117728008, 40117728009, 40117728010

METHOD BLANK: 1192800 Matrix: Solid

Associated Lab Samples: 40117728001, 40117728002, 40117728003, 40117728004, 40117728005, 40117728006, 40117728007,

40117728008, 40117728009, 40117728010

		Blank	Reporting		
Parameter	Units	Result	Limit	Analyzed	Qualifiers
Arsenic	mg/kg	<0.64	2.0	07/16/15 17:35	
Beryllium	mg/kg	<0.038	0.40	07/16/15 17:35	
Boron	mg/kg	<0.31	10.0	07/16/15 17:35	
Calcium	mg/kg	<2.7	100	07/16/15 17:35	
Chromium	mg/kg	<0.19	0.50	07/16/15 17:35	
Copper	mg/kg	<0.16	1.0	07/16/15 17:35	
Lead	mg/kg	< 0.43	1.0	07/16/15 17:35	
Molybdenum	mg/kg	<0.21	2.0	07/16/15 17:35	
Zinc	mg/kg	< 0.39	4.0	07/16/15 17:35	

LABORATORY CONTROL SAMPLE:	1192801					
		Spike	LCS	LCS	% Rec	
Parameter	Units	Conc.	Result	% Rec	Limits	Qualifiers
Arsenic	mg/kg	50	48.2	96	80-120	
Beryllium	mg/kg	50	48.3	97	80-120	
Boron	mg/kg	50	47.7	95	80-120	
Calcium	mg/kg	500	490	98	80-120	
Chromium	mg/kg	50	49.4	99	80-120	
Copper	mg/kg	50	49.2	98	80-120	
Lead	mg/kg	50	48.7	97	80-120	
Molybdenum	mg/kg	50	53.2	106	80-120	
Zinc	mg/kg	50	50.1	100	80-120	

MATRIX SPIKE & MATRIX	SPIKE DUPLICA	TE: 11928	02		1192803							
			MS	MSD								
	4	0117728004	Spike	Spike	MS	MSD	MS	MSD	% Rec		Max	
Parameter	Units	Result	Conc.	Conc.	Result	Result	% Rec	% Rec	Limits	RPD	RPD	Qual
Arsenic	mg/kg	14.3	57.7	57.6	65.4	66.8	89	91	75-125	2	20	
Beryllium	mg/kg	3.0	57.7	57.6	51.0	51.0	83	83	75-125	0	20	
Boron	mg/kg	151	57.7	57.6	221	205	121	93	75-125	8	20	
Calcium	mg/kg	73400	577	576	83300	75700	1720	411	75-125	10	20	P6
Chromium	mg/kg	26.5	57.7	57.6	82.8	84.9	98	101	75-125	2	20	
Copper	mg/kg	71.1	57.7	57.6	134	125	109	93	75-125	7	20	
Lead	mg/kg	24.4	57.7	57.6	80.6	80.1	97	97	75-125	1	20	
Molybdenum	mg/kg	2.8	57.7	57.6	51.9	52.4	85	86	75-125	1	20	
Zinc	mg/kg	84.5	57.7	57.6	140	145	96	105	75-125	4	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.

(920)469-2436



QUALITY CONTROL DATA

218938.0006 WESTON DISPOSAL Project:

Pace Project No.: 40117728

Sulfur

Date: 07/22/2015 09:16 AM

QC Batch: MPRP/55948 Analysis Method: EPA 6010 QC Batch Method: EPA 3050 Analysis Description: 6010 MET

40117728001, 40117728002, 40117728003, 40117728004, 40117728005, 40117728006, 40117728007, Associated Lab Samples:

40117728008, 40117728009, 40117728010

METHOD BLANK: 2018652 Matrix: Solid

 $40117728001,\,40117728002,\,40117728003,\,40117728004,\,40117728005,\,40117728006,\,40117728007,\,401$ Associated Lab Samples:

40117728008, 40117728009, 40117728010

mg/kg

Blank Reporting Units Qualifiers Parameter Result Limit Analyzed 07/16/15 11:05

2.3J

21.6

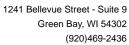
LABORATORY CONTROL SAMPLE: 2018653

LCS LCS Spike % Rec Parameter Units Conc. Result % Rec Limits Qualifiers Sulfur 80-120 917 904 98 mg/kg

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2018655 2018654

MS MSD Spike Spike MS MSD MS MSD 40117731001 % Rec Max Parameter Units Result Conc. % Rec % Rec Limits RPD RPD Conc. Result Result Qual Sulfur mg/kg 38.1 1130 963 984 801 84 79 75-125 21 20 R1

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.





QUALITY CONTROL DATA

Project: 218938.0006 WESTON DISPOSAL

Pace Project No.: 40117728

QC Batch: PMST/11454 Analysis Method: ASTM D2974-87

QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture

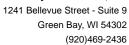
Associated Lab Samples: 40117728001, 40117728002, 40117728003

SAMPLE DUPLICATE: 1189797

Date: 07/22/2015 09:16 AM

40117761001 Dup Max Parameter Units Result Result **RPD** RPD Qualifiers % 9.3 Percent Moisture 9.3 0 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.





QUALITY CONTROL DATA

Project: 218938.0006 WESTON DISPOSAL

Pace Project No.: 40117728

QC Batch: PMST/11466 Analysis Method: ASTM D2974-87

QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture

Associated Lab Samples: 40117728004, 40117728005, 40117728006, 40117728007, 40117728008, 40117728009, 40117728010

SAMPLE DUPLICATE: 1190650

Date: 07/22/2015 09:16 AM

40117710020 Dup Max Parameter Units Result Result **RPD** RPD Qualifiers 7.3 % 7.6 Percent Moisture 5 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.

(920)469-2436



QUALIFIERS

Project: 218938.0006 WESTON DISPOSAL

Pace Project No.: 40117728

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.

LABORATORIES

PASI-G Pace Analytical Services - Green Bay
PASI-M Pace Analytical Services - Minneapolis

ANALYTE QUALIFIERS

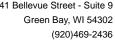
Date: 07/22/2015 09:16 AM

D3 Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

P6 Matrix spike recovery was outside laboratory control limits due to a parent sample concentration notably higher than the

spike level.

R1 RPD value was outside control limits.





QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: 218938.0006 WESTON DISPOSAL

Pace Project No.: 40117728

Date: 07/22/2015 09:16 AM

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40117728001	FA-1	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
40117728001	FA-1	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117728002	FA-2	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
40117728002	FA-2	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117728003	FA-3	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
40117728003	FA-3	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117728004	FA-4	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
40117728004	FA-4	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117728005	FA-5	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
40117728005	FA-5	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117728006	FA-6	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
0117728006	FA-6	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
10117728007	FA-7	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
10117728007	FA-7	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
10117728008	FA-8	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
0117728008	FA-8	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
10117728009	FA-9	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
40117728009	FA-9	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117728010	FA-10	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
40117728010	FA-10	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
10117728001	FA-1	ASTM D2974-87	PMST/11454		
10117728002	FA-2	ASTM D2974-87	PMST/11454		
0117728003	FA-3	ASTM D2974-87	PMST/11454		
10117728004	FA-4	ASTM D2974-87	PMST/11466		
10117728005	FA-5	ASTM D2974-87	PMST/11466		
40117728006	FA-6	ASTM D2974-87	PMST/11466		
10117728007	FA-7	ASTM D2974-87	PMST/11466		
10117728008	FA-8	ASTM D2974-87	PMST/11466		
40117728009	FA-9	ASTM D2974-87	PMST/11466		
40117728010	FA-10	ASTM D2974-87	PMST/11466		

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4			Mail To Address:				I=Sodium Thiosulfate		H=Sodium Bisulfate Solution	H=Sodium I		estan Disposa	Wes	Project Name:	Projec
			Mail To Company:		nol G=NaOH	les Water F=Methanol	Preservation Codes D=HNO3 E=DI Water	C=H2SO4 D	B=HCL C	A=None		5938,0006	218	Project Number:	Projec
			Mail To Contact:		DY	CUSTOR	I	CHAIN OF	CI	-		826-323	608	**	Phone:
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Quick Turn? No, standard

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Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Waste	Waste	Waste	Waste	Waste	Waste	Waste	Waste	Waste	Waste	Matrix					artin	. Hotstream	218938.0000
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Pace Analytical

Sample Condition Upon Receipt

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

/ AUG Allalytical					<u>and the first of the state of </u>
Client Name: TRC			Project #:		10117728
Courier Fed Ex T UPS T Clie	nt F Pace Other				
Tracking #: 7739 299	59,5876		3 1	40117728	
Custody Seal on Cooler/Box Presen		Seals intact:	yes r⊓o [Washington and the state of the
Custody Seal on Samples Present:	yes to no	Seals intact:	T yes no	1	
Packing Material: Bubble Wra	Bubble Bag	s F Noo	Other	1	
Thermometer Used 17/7			Blue Dry None		ice, cooling process has begun
Cooler Temperature Uncorr: RO	1 /Corr:	Biolo	gical Tissue is Fro	zen: Tyes	
Temp Blank Present: yes	no	100		T no	Person examining contents:
Temp should be above freezing to 6°C for a Frozen Biota Samples should be received ≤			Comments:		Initials: KEW)
Chain of Custody Present:	Yes	□No □N/A	1.		
Chain of Custody Filled Out:	X V	XNa □N/A	2004 no	collect	time KW 7-7-19
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	□N₀ □N/A	5.		
 VOA Samples frozen upon rec 	eipt □Yes	□No	Date/Time:		
Short Hold Time Analysis (<72hr):	□Yes	No □N/A	6.		
Rush Turn Around Time Requested:	□Yøs	ZNo □N/A	7.		
Sufficient Volume:	OxiYes	DNO DN/A	8.		
Correct Containers Used:	XYes	□No □N/A	9.		
-Pace Containers Used:	Yes	□No □N/A			
-Pace IR Containers Used:	□Yes	□NO ZÍN/A			
Containers Intact:	Yes	□No □N/A	10.		
Filtered volume received for Dissolved	tests □yes				
Sample Labels match COC:	CXA C	MN) □N/A	12.004十	ve @ (
-Includes date/time/ID/Analysis	Matrix:				KW 7-7-15
All containers needing preservation have be (Non-Compliance noted in 13.)	en checked. □Yes	□NO N/A	13. T HNO3	☐ H2SO4 ☐	NaOH T NaOH +ZnAct
All containers needing preservation are foun	d to be in				
compliance with EPA recommendation.	□Yes	□no OXN/A			
(HNO3, H2SO4 ≤2; NaOH+ZnAct ≥9, NaOH exceptions: VOA, coliform, TOC, TOX, TOH,		<u> </u>	3 L	ab Std #ID of	Date/
O&G, WIDROW, Phenolics, OTHER:	□Yes	No	completed r	preservative	Time:
Headspace in VOA Vials (>6mm):	□Yes	□No ŒN/A	14.		
Trip Blank Present:	□Yes	□No CON/A	15.		
Trip Blank Custody Seals Present	□Yes	□No □NA			
Pace Trip Blank Lot # (if purchased):					I Come for additional accessor.
Client Notification/ Resolution: Person Contacted:		Date/		necked, see attache	ed form for additional comments
Comments/ Resolution:	<u> </u>	Date	i iiiiG.		
- Common Coolano			-		
		1 1			
Project Manager Review:		11 fir	TN	Date:	7-7-15
			<u> </u>		



(920)469-2436



July 22, 2015

Jonathan Hotstream TRC - Madison 708 Heartland Trail Madison, WI 53717

RE: Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Dear Jonathan Hotstream:

Enclosed are the analytical results for sample(s) received by the laboratory on July 07, 2015. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI 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

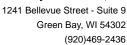
Tod nolteneya

tod.noltemeyer@pacelabs.com

Project Manager

Enclosures







CERTIFICATIONS

Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Minnesota Certification IDs

1700 Elm Street SE Suite 200, Minneapolis, MN 55414

A2LA Certification #: 2926.01 Alaska Certification #: UST-078 Alaska Certification #MN00064 Alabama Certification #40770 Arizona Certification #: AZ-0014 Arkansas Certification #: 88-0680 California Certification #: 01155CA Colorado Certification #Pace

Connecticut Certification #: PH-0256 EPA Region 8 Certification #: 8TMS-L Florida/NELAP Certification #: E87605

Guam Certification #:14-008r Georgia Certification #: 959 Georgia EPD #: Pace

Idaho Certification #: MN00064 Hawaii Certification #MN00064 Illinois Certification #: 200011 Indiana Certification#C-MN-01 Iowa Certification #: 368

Kansas Certification #: E-10167 Kentucky Dept of Envi. Protection - DW #90062 Kentucky Dept of Envi. Protection - WW #:90062

Louisiana DEQ Certification #: 3086 Louisiana DHH #: LA140001 Maine Certification #: 2013011 Maryland Certification #: 322

Michigan DEPH Certification #: 9909

Minnesota Certification #: 027-053-137

Mississippi Certification #: Pace Montana Certification #: MT0092 Nevada Certification #: MN_00064 Nebraska Certification #: Pace New Jersey Certification #: MN-002 New York Certification #: 11647 North Carolina Certification #: 530

North Carolina State Public Health #: 27700

North Dakota Certification #: R-036

Ohio EPA #: 4150 Ohio VAP Certification #: CL101 Oklahoma Certification #: 9507 Oregon Certification #: MN200001 Oregon Certification #: MN300001 Pennsylvania Certification #: 68-00563

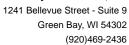
Puerto Rico Certification Saipan (CNMI) #:MP0003 South Carolina #:74003001 Texas Certification #: T104704192 Tennessee Certification #: 02818 Utah Certification #: MN000642013-4 Virginia DGS Certification #: 251 Virginia/VELAP Certification #: Pace Washington Certification #: C486 West Virginia Certification #: 382 West Virginia DHHR #:9952C

Wisconsin Certification #: 999407970

Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302 Florida/NELAP Certification #: E87948 Illinois Certification #: 200050 Kentucky Certification #: 82 Louisiana Certification #: 04168 Minnesota Certification #: 055-999-334

North Dakota Certification #: R-150 South Carolina Certification #: 83006001 Texas Certification #: T104704529-14-1 US Dept of Agriculture #: S-76505 Wisconsin Certification #: 405132750





SAMPLE SUMMARY

Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40117731001	CL-1	Solid	07/02/15 10:00	07/07/15 09:50
40117731002	CL-2	Solid	07/02/15 10:10	07/07/15 09:50
40117731003	CL-3	Solid	07/02/15 10:20	07/07/15 09:50
40117731004	CL-4	Solid	07/02/15 10:30	07/07/15 09:50
40117731005	CL-5	Solid	07/02/15 10:40	07/07/15 09:50
40117731006	CL-6	Solid	07/02/15 10:50	07/07/15 09:50
40117731007	CL-7	Solid	07/02/15 11:00	07/07/15 09:50
40117731008	CL-8	Solid	07/02/15 11:10	07/07/15 09:50
40117731009	CL-9	Solid	07/02/15 11:20	07/07/15 09:50
40117731010	CL-10	Solid	07/02/15 11:30	07/07/15 09:50

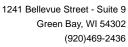


SAMPLE ANALYTE COUNT

Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
40117731001	CL-1	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	MAM	1	PASI-G
40117731002	CL-2	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	MAM	1	PASI-G
40117731003	CL-3	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	MAM	1	PASI-G
40117731004	CL-4	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	MAM	1	PASI-G
40117731005	CL-5	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	MAM	1	PASI-G
40117731006	CL-6	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	MAM	1	PASI-G
40117731007	CL-7	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	MAM	1	PASI-G
40117731008	CL-8	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	MAM	1	PASI-G
40117731009	CL-9	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	MAM	1	PASI-G
40117731010	CL-10	EPA 6010	DLB	9	PASI-G
		EPA 6010	DM	1	PASI-M
		ASTM D2974-87	MAM	1	PASI-G





PROJECT NARRATIVE

Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

 Method:
 EPA 6010

 Description:
 6010 MET ICP

 Client:
 TRC - MADISON

 Date:
 July 22, 2015

General Information:

10 samples were analyzed for EPA 6010. 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 3050 with any exceptions noted below.

The samples were prepared in accordance with EPA 3050 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.

Method Blank:

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

QC Batch: MPRP/55948

- B: Analyte was detected in the associated method blank.
 - BLANK for HBN 365598 [MPRP/559 (Lab ID: 2018652)
 - Sulfur

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: MPRP/12240

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 40117731003

M0: Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

- MS (Lab ID: 1192962)
 - Boron
 - Chromium
- MSD (Lab ID: 1192963)
 - Boron
 - Zinc

(920)469-2436



PROJECT NARRATIVE

Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

 Method:
 EPA 6010

 Description:
 6010 MET ICP

 Client:
 TRC - MADISON

 Date:
 July 22, 2015

QC Batch: MPRP/55948

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 40117731001

R1: RPD value was outside control limits.

• MSD (Lab ID: 2018655)

• Sulfur

Additional Comments:

Analyte Comments:

QC Batch: MPRP/12239

D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

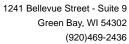
- CL-1 (Lab ID: 40117731001)
 - Arsenic
 - Lead
- CL-2 (Lab ID: 40117731002)
 - Arsenic
 - Lead

QC Batch: MPRP/12240

D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

- CL-10 (Lab ID: 40117731010)
 - Arsenic
 - Lead
- CL-3 (Lab ID: 40117731003)
 - Arsenic
 - Lead
- CL-4 (Lab ID: 40117731004)
 - Arsenic
 - Lead
- CL-5 (Lab ID: 40117731005)
 - Arsenic
- CL-6 (Lab ID: 40117731006)
 - Arsenic
- CL-7 (Lab ID: 40117731007)
 - Arsenic
- CL-8 (Lab ID: 40117731008)
 - Arsenic
 - Lead
- CL-9 (Lab ID: 40117731009)
 - Arsenic

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





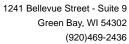
Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Sample: CL-1 Lab ID: 40117731001 Collected: 07/02/15 10:00 Received: 07/07/15 09:50 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	\ 6010 Prepar	ation Metho	od: EP	A 3050			
Sulfur	38.1	mg/kg	28.9	2.1	1	07/13/15 23:29	07/16/15 11:11		R1
Arsenic	<3.8	mg/kg	12.0	3.8	5	07/15/15 12:47	07/17/15 10:57	7440-38-2	D3
Beryllium	0.98	mg/kg	0.48	0.045	1	07/15/15 12:47	07/16/15 18:19	7440-41-7	
Boron	133	mg/kg	12.0	0.38	1	07/15/15 12:47	07/16/15 18:19	7440-42-8	
Calcium	1370	mg/kg	120	3.3	1	07/15/15 12:47	07/16/15 18:19	7440-70-2	
Chromium	94.3	mg/kg	3.0	1.2	5	07/15/15 12:47	07/17/15 10:57	7440-47-3	
Copper	58.8	mg/kg	6.0	0.94	5	07/15/15 12:47	07/17/15 10:57	7440-50-8	
Lead	2.7J	mg/kg	6.0	2.6	5	07/15/15 12:47	07/17/15 10:57	7439-92-1	D3
Molybdenum	<0.26	mg/kg	2.4	0.26	1	07/15/15 12:47	07/16/15 18:19	7439-98-7	
Zinc	48.1	mg/kg	4.8	0.46	1	07/15/15 12:47	07/16/15 18:19	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	16.9	%	0.10	0.10	1		07/15/15 09:27		





Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Sample: CL-2 Lab ID: 40117731002 Collected: 07/02/15 10:10 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Sulfur	21.3J	mg/kg	27.4	2.0	1	07/13/15 23:29	07/16/15 11:27		В
Arsenic	<3.9	mg/kg	12.1	3.9	5	07/15/15 12:47	07/17/15 10:59	7440-38-2	D3
Beryllium	0.63	mg/kg	0.48	0.046	1	07/15/15 12:47	07/16/15 18:22	7440-41-7	
Boron	176	mg/kg	12.1	0.38	1	07/15/15 12:47	07/16/15 18:22	7440-42-8	
Calcium	1650	mg/kg	121	3.3	1	07/15/15 12:47	07/16/15 18:22	7440-70-2	
Chromium	85.5	mg/kg	3.0	1.2	5	07/15/15 12:47	07/17/15 10:59	7440-47-3	
Copper	22.4	mg/kg	6.1	0.94	5	07/15/15 12:47	07/17/15 10:59	7440-50-8	
Lead	3.0J	mg/kg	6.1	2.6	5	07/15/15 12:47	07/17/15 10:59	7439-92-1	D3
Molybdenum	<0.26	mg/kg	2.4	0.26	1	07/15/15 12:47	07/16/15 18:22	7439-98-7	
Zinc	30.3	mg/kg	4.8	0.47	1	07/15/15 12:47	07/16/15 18:22	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	28.3	%	0.10	0.10	1		07/15/15 09:28		

(920)469-2436



ANALYTICAL RESULTS

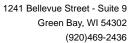
Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Sample: CL-3 Lab ID: 40117731003 Collected: 07/02/15 10:20 Received: 07/07/15 09:50 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepai	ration Metho	od: EP	A 3050			
Sulfur	27.7	mg/kg	24.0	1.7	1	07/13/15 23:29	07/16/15 11:30		В
Arsenic	7.0J	mg/kg	12.9	4.1	5	07/15/15 13:40	07/17/15 12:32	7440-38-2	D3
Beryllium	1.1	mg/kg	0.51	0.048	1	07/15/15 13:40	07/16/15 18:52	7440-41-7	
Boron	103	mg/kg	12.9	0.40	1	07/15/15 13:40	07/16/15 18:52	7440-42-8	M0
Calcium	1210	mg/kg	129	3.5	1	07/15/15 13:40	07/16/15 18:52	7440-70-2	
Chromium	106	mg/kg	3.2	1.2	5	07/15/15 13:40	07/17/15 12:32	7440-47-3	M0
Copper	67.7	mg/kg	6.4	1.0	5	07/15/15 13:40	07/17/15 12:32	7440-50-8	
Lead	4.9J	mg/kg	6.4	2.8	5	07/15/15 13:40	07/17/15 12:32	7439-92-1	D3
Molybdenum	0.49J	mg/kg	2.6	0.27	1	07/15/15 13:40	07/16/15 18:52	7439-98-7	
Zinc	83.2	mg/kg	5.1	0.50	1	07/15/15 13:40	07/16/15 18:52	7440-66-6	MO
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	22.3	%	0.10	0.10	1		07/15/15 09:28		





Project: 218938 PH. 6 WESTON DISPOSAL

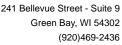
Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Sample: CL-4 Lab ID: 40117731004 Collected: 07/02/15 10:30 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Sulfur	47.5	mg/kg	30.7	2.2	1	07/13/15 23:29	07/16/15 11:33		
Arsenic	6.1J	mg/kg	10.7	3.4	5	07/15/15 13:40	07/17/15 12:39	7440-38-2	D3
Beryllium	0.73	mg/kg	0.43	0.040	1	07/15/15 13:40	07/16/15 18:59	7440-41-7	
Boron	144	mg/kg	10.7	0.33	1	07/15/15 13:40	07/16/15 18:59	7440-42-8	
Calcium	2180	mg/kg	107	2.9	1	07/15/15 13:40	07/16/15 18:59	7440-70-2	
Chromium	137	mg/kg	2.7	1.0	5	07/15/15 13:40	07/17/15 12:39	7440-47-3	
Copper	29.7	mg/kg	5.4	0.84	5	07/15/15 13:40	07/17/15 12:39	7440-50-8	
Lead	4.2J	mg/kg	5.4	2.3	5	07/15/15 13:40	07/17/15 12:39	7439-92-1	D3
Molybdenum	0.42J	mg/kg	2.1	0.23	1	07/15/15 13:40	07/16/15 18:59	7439-98-7	
Zinc	27.3	mg/kg	4.3	0.41	1	07/15/15 13:40	07/16/15 18:59	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	18.6	%	0.10	0.10	1		07/14/15 14:32		





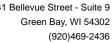
Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Sample: CL-5 Lab ID: 40117731005 Collected: 07/02/15 10:40 Received: 07/07/15 09:50 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Sulfur	34.1	mg/kg	22.7	1.6	1	07/13/15 23:29	07/16/15 11:46		
Arsenic	4.5J	mg/kg	12.0	3.8	5	07/15/15 13:40	07/17/15 12:46	7440-38-2	D3
Beryllium	0.75	mg/kg	0.48	0.045	1	07/15/15 13:40	07/16/15 19:01	7440-41-7	
Boron	142	mg/kg	12.0	0.38	1	07/15/15 13:40	07/16/15 19:01	7440-42-8	
Calcium	1970	mg/kg	120	3.3	1	07/15/15 13:40	07/16/15 19:01	7440-70-2	
Chromium	82.7	mg/kg	3.0	1.2	5	07/15/15 13:40	07/17/15 12:46	7440-47-3	
Copper	31.8	mg/kg	6.0	0.94	5	07/15/15 13:40	07/17/15 12:46	7440-50-8	
Lead	7.1	mg/kg	6.0	2.6	5	07/15/15 13:40	07/17/15 12:46	7439-92-1	
Molybdenum	<0.26	mg/kg	2.4	0.26	1	07/15/15 13:40	07/16/15 19:01	7439-98-7	
Zinc	34.1	mg/kg	4.8	0.46	1	07/15/15 13:40	07/16/15 19:01	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	21.4	%	0.10	0.10	1		07/14/15 14:32		





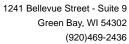
Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Sample: CL-6 Lab ID: 40117731006 Collected: 07/02/15 10:50 Received: 07/07/15 09:50 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepai	ration Metho	od: EP	A 3050			
Sulfur	28.1J	mg/kg	28.6	2.0	1	07/13/15 23:29	07/16/15 11:49		В
Arsenic	5.6J	mg/kg	11.0	3.5	5	07/15/15 13:40	07/17/15 12:49	7440-38-2	D3
Beryllium	0.66	mg/kg	0.44	0.041	1	07/15/15 13:40	07/16/15 19:03	7440-41-7	
Boron	128	mg/kg	11.0	0.34	1	07/15/15 13:40	07/16/15 19:03	7440-42-8	
Calcium	1910	mg/kg	110	3.0	1	07/15/15 13:40	07/16/15 19:03	7440-70-2	
Chromium	84.2	mg/kg	2.7	1.1	5	07/15/15 13:40	07/17/15 12:49	7440-47-3	
Copper	29.3	mg/kg	5.5	0.86	5	07/15/15 13:40	07/17/15 12:49	7440-50-8	
Lead	5.9	mg/kg	5.5	2.4	5	07/15/15 13:40	07/17/15 12:49	7439-92-1	
Molybdenum	<0.23	mg/kg	2.2	0.23	1	07/15/15 13:40	07/16/15 19:03	7439-98-7	
Zinc	36.3	mg/kg	4.4	0.42	1	07/15/15 13:40	07/16/15 19:03	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	22.5	%	0.10	0.10	1		07/14/15 14:32		





Project: 218938 PH. 6 WESTON DISPOSAL

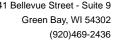
Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Sample: CL-7 Lab ID: 40117731007 Collected: 07/02/15 11:00 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Arsenic	6.4J	mg/kg	11.8	3.7	5	07/15/15 13:40	07/17/15 12:51	7440-38-2	D3
Sulfur	37.8	mg/kg	30.4	2.2	1	07/13/15 23:29	07/16/15 11:52		
Beryllium	0.76	mg/kg	0.47	0.044	1	07/15/15 13:40	07/16/15 19:06	7440-41-7	
Boron	131	mg/kg	11.8	0.37	1	07/15/15 13:40	07/16/15 19:06	7440-42-8	
Calcium	1760	mg/kg	118	3.2	1	07/15/15 13:40	07/16/15 19:06	7440-70-2	
Chromium	75.1	mg/kg	2.9	1.1	5	07/15/15 13:40	07/17/15 12:51	7440-47-3	
Copper	34.6	mg/kg	5.9	0.92	5	07/15/15 13:40	07/17/15 12:51	7440-50-8	
Lead	5.9	mg/kg	5.9	2.5	5	07/15/15 13:40	07/17/15 12:51	7439-92-1	
Molybdenum	<0.25	mg/kg	2.4	0.25	1	07/15/15 13:40	07/16/15 19:06	7439-98-7	
Zinc	37.5	mg/kg	4.7	0.45	1	07/15/15 13:40	07/16/15 19:06	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	20.1	%	0.10	0.10	1		07/14/15 14:32		





Project: 218938 PH. 6 WESTON DISPOSAL

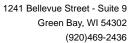
Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Sample: CL-8 Lab ID: 40117731008 Collected: 07/02/15 11:10 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Arsenic	7.7J	mg/kg	12.8	4.1	5	07/15/15 13:40	07/17/15 12:54	7440-38-2	D3
Sulfur	16.5J	mg/kg	24.1	1.7	1	07/13/15 23:29	07/16/15 11:55		В
Beryllium	0.69	mg/kg	0.51	0.048	1	07/15/15 13:40	07/16/15 19:13	7440-41-7	
Boron	150	mg/kg	12.8	0.40	1	07/15/15 13:40	07/16/15 19:13	7440-42-8	
Calcium	1660	mg/kg	128	3.5	1	07/15/15 13:40	07/16/15 19:13	7440-70-2	
Chromium	56.7	mg/kg	3.2	1.2	5	07/15/15 13:40	07/17/15 12:54	7440-47-3	
Copper	31.3	mg/kg	6.4	1.0	5	07/15/15 13:40	07/17/15 12:54	7440-50-8	
Lead	4.9J	mg/kg	6.4	2.8	5	07/15/15 13:40	07/17/15 12:54	7439-92-1	D3
Molybdenum	<0.27	mg/kg	2.6	0.27	1	07/15/15 13:40	07/16/15 19:13	7439-98-7	
Zinc	34.4	mg/kg	5.1	0.49	1	07/15/15 13:40	07/16/15 19:13	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	22.0	%	0.10	0.10	1		07/14/15 14:32		





Project: 218938 PH. 6 WESTON DISPOSAL

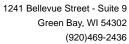
Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Sample: CL-9 Lab ID: 40117731009 Collected: 07/02/15 11:20 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Sulfur	36.1	mg/kg	23.6	1.7	1	07/13/15 23:29	07/16/15 11:59		
Arsenic	<3.4	mg/kg	10.8	3.4	5	07/15/15 13:40	07/17/15 12:56	7440-38-2	D3
Beryllium	0.66	mg/kg	0.43	0.041	1	07/15/15 13:40	07/16/15 19:15	7440-41-7	
Boron	109	mg/kg	10.8	0.34	1	07/15/15 13:40	07/16/15 19:15	7440-42-8	
Calcium	1690	mg/kg	108	3.0	1	07/15/15 13:40	07/16/15 19:15	7440-70-2	
Chromium	60.0	mg/kg	0.54	0.21	1	07/15/15 13:40	07/16/15 19:15	7440-47-3	
Copper	41.9	mg/kg	5.4	0.84	5	07/15/15 13:40	07/17/15 12:56	7440-50-8	
Lead	6.0	mg/kg	5.4	2.3	5	07/15/15 13:40	07/17/15 12:56	7439-92-1	
Molybdenum	<0.23	mg/kg	2.2	0.23	1	07/15/15 13:40	07/16/15 19:15	7439-98-7	
Zinc	34.7	mg/kg	4.3	0.42	1	07/15/15 13:40	07/16/15 19:15	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	20.9	%	0.10	0.10	1		07/14/15 14:32		





Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Sample: CL-10 Lab ID: 40117731010 Collected: 07/02/15 11:30 Received: 07/07/15 09:50 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP/	A 3050			
Arsenic	6.4J	mg/kg	11.7	3.7	5	07/15/15 13:40	07/17/15 12:58	7440-38-2	D3
Sulfur	16.0J	mg/kg	29.0	2.1	1	07/13/15 23:29	07/16/15 12:02		В
Beryllium	0.76	mg/kg	0.47	0.044	1	07/15/15 13:40	07/16/15 19:17	7440-41-7	
Boron	106	mg/kg	11.7	0.37	1	07/15/15 13:40	07/16/15 19:17	7440-42-8	
Calcium	1760	mg/kg	117	3.2	1	07/15/15 13:40	07/16/15 19:17	7440-70-2	
Chromium	81.1	mg/kg	0.59	0.23	1	07/15/15 13:40	07/16/15 19:17	7440-47-3	
Copper	46.7	mg/kg	5.9	0.91	5	07/15/15 13:40	07/17/15 12:58	7440-50-8	
Lead	3.5J	mg/kg	5.9	2.5	5	07/15/15 13:40	07/17/15 12:58	7439-92-1	D3
Molybdenum	<0.25	mg/kg	2.3	0.25	1	07/15/15 13:40	07/16/15 19:17	7439-98-7	
Zinc	36.8	mg/kg	4.7	0.45	1	07/15/15 13:40	07/16/15 19:17	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	21.6	%	0.10	0.10	1		07/14/15 14:32		



QUALITY CONTROL DATA

Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

QC Batch: MPRP/12239 Analysis Method: EPA 6010
QC Batch Method: EPA 3050 Analysis Description: 6010 MET

Associated Lab Samples: 40117731001, 40117731002

METHOD BLANK: 1192800 Matrix: Solid

Associated Lab Samples: 40117731001, 40117731002

Parameter	Units	Blank Result	Reporting Limit	Analyzad	Qualifiers
Farameter	UIIIS	. ————————————————————————————————————		Analyzed	
Arsenic	mg/kg	< 0.64	2.0	07/16/15 17:35	
Beryllium	mg/kg	<0.038	0.40	07/16/15 17:35	
Boron	mg/kg	<0.31	10.0	07/16/15 17:35	
Calcium	mg/kg	<2.7	100	07/16/15 17:35	
Chromium	mg/kg	<0.19	0.50	07/16/15 17:35	
Copper	mg/kg	<0.16	1.0	07/16/15 17:35	
Lead	mg/kg	< 0.43	1.0	07/16/15 17:35	
Molybdenum	mg/kg	<0.21	2.0	07/16/15 17:35	
Zinc	mg/kg	< 0.39	4.0	07/16/15 17:35	

LABORATORY CONTROL SAMPLE:	1192801					
		Spike	LCS	LCS	% Rec	
Parameter	Units	Conc.	Result	% Rec	Limits	Qualifiers
Arsenic	mg/kg	50	48.2	96	80-120	
Beryllium	mg/kg	50	48.3	97	80-120	
Boron	mg/kg	50	47.7	95	80-120	
Calcium	mg/kg	500	490	98	80-120	
Chromium	mg/kg	50	49.4	99	80-120	
Copper	mg/kg	50	49.2	98	80-120	
Lead	mg/kg	50	48.7	97	80-120	
Molybdenum	mg/kg	50	53.2	106	80-120	
Zinc	mg/kg	50	50.1	100	80-120	

MATRIX SPIKE & MATRIX	SPIKE DUPLICA	TE: 11928	02		1192803							
	4	0117728004	MS Spike	MSD Spike	MS	MSD	MS	MSD	% Rec		Max	
Parameter	Units	Result	Conc.	Conc.	Result	Result	% Rec	% Rec	Limits	RPD	RPD	Qual
Arsenic	mg/kg	14.3	57.7	57.6	65.4	66.8	89	91	75-125	2	20	
Beryllium	mg/kg	3.0	57.7	57.6	51.0	51.0	83	83	75-125	0	20	
Boron	mg/kg	151	57.7	57.6	221	205	121	93	75-125	8	20	
Calcium	mg/kg	73400	577	576	83300	75700	1720	411	75-125	10	20	P6
Chromium	mg/kg	26.5	57.7	57.6	82.8	84.9	98	101	75-125	2	20	
Copper	mg/kg	71.1	57.7	57.6	134	125	109	93	75-125	7	20	
Lead	mg/kg	24.4	57.7	57.6	80.6	80.1	97	97	75-125	1	20	
Molybdenum	mg/kg	2.8	57.7	57.6	51.9	52.4	85	86	75-125	1	20	
Zinc	mg/kg	84.5	57.7	57.6	140	145	96	105	75-125	4	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.



QUALITY CONTROL DATA

Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

QC Batch: MPRP/12240 Analysis Method: EPA 6010
QC Batch Method: EPA 3050 Analysis Description: 6010 MET

Associated Lab Samples: 40117731003, 40117731004, 40117731005, 40117731006, 40117731007, 40117731008, 40117731009,

40117731010

METHOD BLANK: 1192960 Matrix: Solid

Associated Lab Samples: 40117731003, 40117731004, 40117731005, 40117731006, 40117731007, 40117731008, 40117731009,

40117731010

		Blank	Reporting		
Parameter	Units	Result	Limit	Analyzed	Qualifiers
Arsenic	mg/kg	<0.64	2.0	07/16/15 18:48	
Beryllium	mg/kg	<0.038	0.40	07/16/15 18:48	
Boron	mg/kg	0.61J	10.0	07/16/15 18:48	
Calcium	mg/kg	5.2J	100	07/16/15 18:48	
Chromium	mg/kg	<0.19	0.50	07/16/15 18:48	
Copper	mg/kg	<0.16	1.0	07/16/15 18:48	
Lead	mg/kg	< 0.43	1.0	07/16/15 18:48	
Molybdenum	mg/kg	<0.21	2.0	07/16/15 18:48	
Zinc	mg/kg	< 0.39	4.0	07/16/15 18:48	

LABORATORY CONTROL SAMPLE:	1192961	Spike	LCS	LCS	% Rec	
Parameter	Units	Conc.	Result	% Rec	Limits	Qualifiers
Arsenic	mg/kg	50	48.1	96	80-120	
Beryllium	mg/kg	50	48.7	97	80-120	
Boron	mg/kg	50	48.1	96	80-120	
Calcium	mg/kg	500	495	99	80-120	
Chromium	mg/kg	50	49.6	99	80-120	
Copper	mg/kg	50	49.1	98	80-120	
Lead	mg/kg	50	48.5	97	80-120	
Molybdenum	mg/kg	50	53.5	107	80-120	
Zinc	mg/kg	50	50.4	101	80-120	

MATRIX SPIKE & MATRIX	SPIKE DUPLICA	TE: 11929	62	·	1192963	·	·	·	·			
			MS	MSD								
	4	0117731003	Spike	Spike	MS	MSD	MS	MSD	% Rec		Max	
Parameter	Units	Result	Conc.	Conc.	Result	Result	% Rec	% Rec	Limits	RPD	RPD	Qual
Arsenic	mg/kg	7.0J	64.3	64.3	60.3	64.9	83	90	75-125	7	20	
Beryllium	mg/kg	1.1	64.3	64.3	61.9	61.1	95	93	75-125	1	20	
Boron	mg/kg	103	64.3	64.3	252	224	231	189	75-125	12	20	MO
Calcium	mg/kg	1210	643	643	1870	1820	102	95	75-125	2	20	
Chromium	mg/kg	106	64.3	64.3	152	159	72	82	75-125	4	20	MO
Copper	mg/kg	67.7	64.3	64.3	129	125	96	89	75-125	3	20	
Lead	mg/kg	4.9J	64.3	64.3	70.2	67.2	102	97	75-125	4	20	
Molybdenum	mg/kg	0.49J	64.3	64.3	61.1	60.0	94	93	75-125	2	20	
Zinc	mg/kg	83.2	64.3	64.3	132	121	76	59	75-125	8	20	MO

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.

(920)469-2436



QUALITY CONTROL DATA

218938 PH. 6 WESTON DISPOSAL Project:

Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Sulfur

QC Batch: MPRP/55948 Analysis Method: EPA 6010 QC Batch Method: EPA 3050 Analysis Description: 6010 MET

40117731001, 40117731002, 40117731003, 40117731004, 40117731005, 40117731006, 40117731007, Associated Lab Samples:

40117731008, 40117731009, 40117731010

METHOD BLANK: 2018652 Matrix: Solid

 $40117731001,\,40117731002,\,40117731003,\,40117731004,\,40117731005,\,40117731006,\,40117731007,\,401$ Associated Lab Samples:

40117731008, 40117731009, 40117731010

mg/kg

Blank Reporting Qualifiers Parameter Units Result Limit Analyzed 07/16/15 11:05

2.3J

21.6

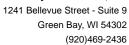
LABORATORY CONTROL SAMPLE: 2018653

LCS LCS Spike % Rec Parameter Units Conc. Result % Rec Limits Qualifiers Sulfur 917 904 98 80-120 mg/kg

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2018655 2018654 MS MSD

Spike MS MSD MS MSD 40117731001 Spike % Rec Max Parameter Units Result Conc. % Rec % Rec Limits RPD RPD Conc. Result Result Qual Sulfur mg/kg 38.1 1130 963 984 801 84 79 75-125 21 20 R1

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.





QUALITY CONTROL DATA

Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

QC Batch: PMST/11484 Analysis Method: ASTM D2974-87

QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture

Associated Lab Samples: 40117731004, 40117731005, 40117731006, 40117731007, 40117731008, 40117731009, 40117731010

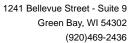
SAMPLE DUPLICATE: 1192290

Date: 07/22/2015 09:16 AM

 Percent Moisture
 Wax Result
 Dup Result
 Max Result
 RPD
 RPD
 Qualifiers

 17.8
 17.7
 1
 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.





QUALITY CONTROL DATA

Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

QC Batch: PMST/11489 Analysis Method: ASTM D2974-87

QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture

Associated Lab Samples: 40117731001, 40117731002, 40117731003

SAMPLE DUPLICATE: 1192731

Date: 07/22/2015 09:16 AM

 Percent Moisture
 Wax Result
 Apple Result
 Max Result
 RPD
 Max RPD
 Qualifiers

 Percent Moisture
 %
 58.7
 58.2
 1
 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.

(920)469-2436



QUALIFIERS

Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

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.

LABORATORIES

PASI-G	Pace Analytical Services - Green Bay
PASI-M	Pace Analytical Services - Minneapolis

ANALYTE QUALIFIERS

Date: 07/22/2015 09:16 AM

В	Analyte was detected in the associated method blank.
---	--

D3 Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

M0 Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

P6 Matrix spike recovery was outside laboratory control limits due to a parent sample concentration notably higher than the

spike level.

R1 RPD value was outside control limits.





QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: 218938 PH. 6 WESTON DISPOSAL

Pace Project No.: 40117731

Date: 07/22/2015 09:16 AM

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40117731001	CL-1	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
40117731001	CL-1	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117731002	CL-2	EPA 3050	MPRP/12239	EPA 6010	ICP/10884
40117731002	CL-2	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117731003	CL-3	EPA 3050	MPRP/12240	EPA 6010	ICP/10885
40117731003	CL-3	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117731004	CL-4	EPA 3050	MPRP/12240	EPA 6010	ICP/10885
40117731004	CL-4	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117731005	CL-5	EPA 3050	MPRP/12240	EPA 6010	ICP/10885
40117731005	CL-5	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117731006	CL-6	EPA 3050	MPRP/12240	EPA 6010	ICP/10885
10117731006	CL-6	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
0117731007	CL-7	EPA 3050	MPRP/12240	EPA 6010	ICP/10885
10117731007	CL-7	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
10117731008	CL-8	EPA 3050	MPRP/12240	EPA 6010	ICP/10885
10117731008	CL-8	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117731009	CL-9	EPA 3050	MPRP/12240	EPA 6010	ICP/10885
40117731009	CL-9	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117731010	CL-10	EPA 3050	MPRP/12240	EPA 6010	ICP/10885
40117731010	CL-10	EPA 3050	MPRP/55948	EPA 6010	ICP/24578
40117731001	CL-1	ASTM D2974-87	PMST/11489		
10117731002	CL-2	ASTM D2974-87	PMST/11489		
40117731003	CL-3	ASTM D2974-87	PMST/11489		
40117731004	CL-4	ASTM D2974-87	PMST/11484		
40117731005 40117731006	CL-5 CL-6	ASTM D2974-87 ASTM D2974-87	PMST/11484 PMST/11484		
10117731006 10117731007	CL-6 CL-7	ASTM D2974-87 ASTM D2974-87	PMST/11484 PMST/11484		
40117731007 40117731008	CL-8	ASTM D2974-87 ASTM D2974-87	PMST/11484		
40117731008 40117731009	CL-9	ASTM D2974-87 ASTM D2974-87	PMST/11484		
40117731009 40117731010	CL-9 CL-10	ASTM D2974-67 ASTM D2974-87	PMST/11484		

ORIGINAL

Intact / Not Present	Date/Time:	Received By:	Date/Time:		Relinquished By:	Samples on HOLD are subject to special pricing and release of liability	Samples special pric
Cooler Custody Seal						ndestrematical destructions des la company de la compa	Fax:
		Received By:			Relinquished By:		Telephone:
Sample	200 51/1, mond Y	Total Own	115 0950	/(-	A POL		Emall #2:
Receipt Temp = 20 °C) ~ Date/Time:	Received By:	107:5	The state of the s	2	all #1:	Email #1:
	/ Date/Time:	Received By	Date inne			Price Results by (complete what you wan	Transmit Pralim Pus
	Mc Marios / PHOTOLOGY 2:25 For	K	 	ACM.		(Rush TAT subject to approval/surcharge)	(Rush TAT su
PACE Project No.	1	Received By:	Date/Time: 7/2//5		Relinquished By:	Rush Turnaround Time Requested - Prelims	Rush Turnarou
				4	→ 11/35	CL-10	010
			***************************************		1120	02-9	000
					1)10	01-8	800
					118	CL-7	007
			Nacrone processor in		10%	07-6	000
					1040	21-18	8
					1530	CL-4	400
					108	2.2	603
					900	9-2	002
4020 A			× -	5 X	7/2/15/1000	02-1	8
	ଊ		5		ЩĒ		PACE LAB #
LAB COMMENTS Profile #	CHENT		<u>UL</u>			your sample	EPA Level IV
	Invoice To Phone:		FU	/865	B = Biota DW = Drinking Water C = Charcoal GW = Ground Water O = Oil SW = Surface Water	(billable)	EPA Level III
			R	Requ	0.	MS/MSD	Data Package Options (billable)
	Invoice To Address:		-	ieste:	Regulatory Program:	82862	PO #:
	Invoice To Company:			d V		A PAR	Sampled By (Sign):
	Invoice To Contact:		Å	ATION Pick A	PRESERVATION (CODE)*	George Sherea	Sampled By (Print):
			<u>で</u>	ED? YIN N			Project State:
	Mail To Address:		=Sodium Thiosulfate J=Other	H=Sodium Bisulfate Solution		Westen Disposa	Project Name:
	Mail To Company:	anol G≃NaOH	*Preservation Codes D=HNO3 E=DI Water F=Methanol	804	A≕None	218938 Ph.	Project Number:
	Mail To Contact:	DY	OF CUSTO	CHAROT	13	608-826-36	Phone:
Pag	Quote #:		The state of the s	** ***********************************	realin	Town than there	Project Contact:
e 24	L		Augar / S	Face Analytical		Madison	Branch/Location:
	20-469-2436	MN: 612-607-1700			M	TRC COMPANIE	Company Name:
Page 1 of	EGION	UPPER MIDWEST REGION				(Please Print Clearly)	<i></i>

ean Closure Sampling - Weston Disposal Site No.

B. Carrie and Carrie a		
Project Name: Clean Closure Sampling - Weston Disposal Site No. 3	Quick Turn? No, standard	
Project #: 218938.0000	Special Detects? WDNR reporting LOD/LOQ	
Report To: J. Hotstream	Price Quote? Y	
PM: Todd Martin	Specific QC? Y-QC summary	
	Data DL? N	
	Parameters	
	The second secon	

_			-									_										
CL-10	CL-9	CL-8	CL-7	CL-6	CL-5	CL-4	CL-3	CL-2	CL-1	FA-10	FA-9	FA-8	FA-7	FA-6	FA-5	FA-4	FA-3	FA-2	FA-1	Sample Id		
Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Waste	Waste	Waste	Waste	Waste	Waste	Waste	Waste	Waste	Waste	Matrix		
×	X	X	X	X	×	X	X	×	×	×	×	X	×	X	X	X	X	×	×	Arsenic		
×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	Beryllium		
×	×	×	×	×	×	×	×	×	×	×	×	X 3.5	×	X	×	×	×	×	×	Boron		
×	×	×	×	×	×	×	X	×	×	×	×	×	X	×	×	×	×	×	×	Calcium		
×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	(total)	Chromium	Para
X	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	Copper		Parameters
×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	X	Lead		
×	×	×	×	×	×	×	×	×	X	×	×	×	×	X	×	×	×	×	×	Molybdenum		
×	X	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	Sulfur		
×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	×	Zinc		
	اسط				1					1				1			النس					

Sample Condition Upon Receipt

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

Client Name: TRC		Pr	oject #: WO#:	40117731
Couried Fed Ex F UPS F Client F P	ace Other:			
Custody Seal on Cooler/Box Present: ye	\ /	intad: yes [no	ookkeendegeergeergeskreiskingsprongs
Custody Seal on Samples Present: Tyes		_	no	
$\mathbf{N} \wedge \mathbf{N} \wedge $		None F Ott		
cooler Temperature Uncorr: RO 1 /Corr.		Wet Blue Dry		ice, cooling process has begun
		- Diological Hissi	ue is Frozen: Tyes	
emp Blank Present: yes no no emp should be above freezing to 6°C for all sample of	energy L and		r no r	Person examining contents Date: 7-7-(-5
rozen Biota Samples should be received ≤ 0°C.	except Biota.	Commen	is:	Initials: KEW
hain of Custody Present:	Yes □No	□N/A 1.		
Chain of Custody Filled Out:	Yes □No	□N/A 2.		
Chain of Custody Relinquished:	Yes □No	□N/A 3.		·
sampler Name & Signature on COC:	Yes □No	□N/A 4.		
camples Arrived within Hold Time:	Yes No	□N/A 5.		
- VOA Samples frozen upon receipt	□Yes □No	Date/Time:	•	
hort Hold Time Analysis (<72hr):	☐Yes No	□n/a 6.		
ush Turn Around Time Requested:	□Yes ZNo	□n/a 7.		
ufficient Volume:	OYYes DNo	□N/A 8.		
orrect Containers Used:	Yes DNo	□N/A 9.		
-Pace Containers Used:	Yes 🗆 No	□N/A		
-Pace IR Containers Used:	□Yes □N6	ZIN/A		
ontainers Intact;	Yes □No	□N/A 10.		
iltered volume received for Dissolved tests	$\overline{}$			
	$\overline{\wedge}$	XÓN/A 11.		
ample Labels match COC:	Yes No	□N/A 12.		
 Includes date/time/ID/Analysis Matrix: Il containers needing preservation have been checken 				
Ion-Compliance noted in 13.)	u. □Yes □No€	N/A 13.	HNO3 H2SO4	NaOH NaOH +ZnAc
containers needing preservation are found to be in				
ompliance with EPA recommendation. INO3, H2SO4 ≤2; NaOH+ZnAct ≥9, NaOH ≥12)	□Yes □No	XN/A		
ceptions: VOA, coliform, TOC, TOX, TOH,		Initial when	Lab Std #ID of	Date/
	□Yes ZNo	completed	preservative	Time:
eadspace in VOA Vials (>6mm):	□Yes □No C	ØN/A 14.		
ip Blank Present:	□Yes □No€	₽N/A 15.		
ip Blank Custody Seals Present	□Yes □No	DV^\		
ace Trip Blank Lot # (if purchased):				
ient Notification/ Resolution: Person Contacted:		Data (Time -	If checked, see attache	ed form for additional comments
Comments/ Resolution:		Date/Time:		
		-		
				,

Confirmation Sample Laboratory Results



(920)469-2436



August 06, 2015

Jonathan Hotstream TRC - Madison 708 Heartland Trail Madison, WI 53717

RE: Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

Dear Jonathan Hotstream:

Enclosed are the analytical results for sample(s) received by the laboratory on July 31, 2015. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI 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

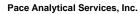
Tod nolteneya

tod.noltemeyer@pacelabs.com

Project Manager

Enclosures





Pace Analytical www.pacelabs.com

1241 Bellevue Street - Suite 9 Green Bay, WI 54302 (920)469-2436

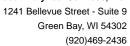
CERTIFICATIONS

Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302 Florida/NELAP Certification #: E87948 Illinois Certification #: 200050 Kentucky Certification #: 82 Louisiana Certification #: 04168 Minnesota Certification #: 055-999-334 North Dakota Certification #: R-150 South Carolina Certification #: 83006001 Texas Certification #: T104704529-14-1 US Dept of Agriculture #: S-76505 Wisconsin Certification #: 405132750



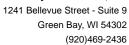


SAMPLE SUMMARY

Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40118960001	SAMPLE 19	Solid	07/30/15 13:00	07/31/15 07:20
40118960002	SAMPLE 20	Solid	07/30/15 13:05	07/31/15 07:20
40118960003	SAMPLE 19, 6-INCH DEEP	Solid	07/30/15 15:00	07/31/15 07:20
40118960004	SAMPLE 20, 6-INCH DEEP	Solid	07/30/15 15:05	07/31/15 07:20



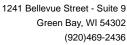


SAMPLE ANALYTE COUNT

Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

Lab ID	Sample ID	Method	Analysts	Analytes Reported
40118960001	SAMPLE 19	EPA 6010	DLB	3
		ASTM D2974-87	MAM	1
40118960002	SAMPLE 20	EPA 6010	DLB	3
		ASTM D2974-87	MAM	1
40118960003	SAMPLE 19, 6-INCH DEEP	EPA 6010	DLB	3
		ASTM D2974-87	MAM	1
40118960004	SAMPLE 20, 6-INCH DEEP	EPA 6010	DLB	3
		ASTM D2974-87	MAM	1





PROJECT NARRATIVE

Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

Method: EPA 6010
Description: 6010 MET ICP
Client: TRC - MADISON
Date: August 06, 2015

General Information:

4 samples were analyzed for EPA 6010. 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 3050 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.

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.

Additional Comments:

Analyte Comments:

QC Batch: MPRP/12362

D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

- SAMPLE 19, 6-INCH DEEP (Lab ID: 40118960003)
 - Lead
- SAMPLE 20, 6-INCH DEEP (Lab ID: 40118960004)
 - Lead

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

1241 Bellevue Street - Suite 9 Green Bay, WI 54302 (920)469-2436



ANALYTICAL RESULTS

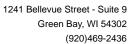
Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

Date: 08/06/2015 02:41 PM

Sample: SAMPLE 19 Lab ID: 40118960001 Collected: 07/30/15 13:00 Received: 07/31/15 07:20 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepara	ation Metho	od: EP/	A 3050			
Calcium	1470	mg/kg	131	3.6	1	08/04/15 13:47	08/05/15 12:50	7440-70-2	
Lead	3.7	mg/kg	1.3	0.56	1	08/04/15 13:47	08/05/15 12:50	7439-92-1	
Zinc	29.1	mg/kg	5.2	0.50	1	08/04/15 13:47	08/05/15 12:50	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	26.9	%	0.10	0.10	1		07/31/15 16:27		





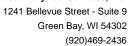
Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

Date: 08/06/2015 02:41 PM

Sample: SAMPLE 20 Lab ID: 40118960002 Collected: 07/30/15 13:05 Received: 07/31/15 07:20 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepara	ation Metho	od: EPA	A 3050			
Calcium	1530	mg/kg	115	3.1	1	08/04/15 13:47	08/05/15 12:52	7440-70-2	
Lead	7.3	mg/kg	2.3	0.99	2	08/04/15 13:47	08/05/15 15:07	7439-92-1	
Zinc	35.7	mg/kg	4.6	0.44	1	08/04/15 13:47	08/05/15 12:52	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	26.4	%	0.10	0.10	1		07/31/15 16:28		





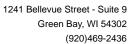
Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

Date: 08/06/2015 02:41 PM

Sample: SAMPLE 19, 6-INCH DEEP Lab ID: 40118960003 Collected: 07/30/15 15:00 Received: 07/31/15 07:20 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepara	ation Metho	od: EPA	A 3050			
Calcium	1870	mg/kg	125	3.4	1	08/04/15 13:47	08/05/15 12:55	7440-70-2	
Lead	<2.7	mg/kg	6.3	2.7	5	08/04/15 13:47	08/05/15 15:09	7439-92-1	D3
Zinc	29.7	mg/kg	5.0	0.48	1	08/04/15 13:47	08/05/15 12:55	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	27.1	%	0.10	0.10	1		07/31/15 16:28		





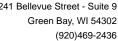
Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

Date: 08/06/2015 02:41 PM

Sample: SAMPLE 20, 6-INCH DEEP Lab ID: 40118960004 Collected: 07/30/15 15:05 Received: 07/31/15 07:20 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepara	ation Metho	od: EPA	A 3050			
Calcium	2570	mg/kg	118	3.2	1	08/04/15 13:47	08/05/15 12:57	7440-70-2	
Lead	2.1J	mg/kg	2.4	1.0	2	08/04/15 13:47	08/05/15 15:12	7439-92-1	D3
Zinc	39.0	mg/kg	4.7	0.46	1	08/04/15 13:47	08/05/15 12:57	7440-66-6	
Percent Moisture	Analytical	Method: ASTI	M D2974-87						
Percent Moisture	21.9	%	0.10	0.10	1		07/31/15 16:28		





QUALITY CONTROL DATA

Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

Date: 08/06/2015 02:41 PM

QC Batch: MPRP/12362 Analysis Method: EPA 6010 QC Batch Method: EPA 3050 Analysis Description: 6010 MET

Associated Lab Samples: 40118960001, 40118960002, 40118960003, 40118960004

METHOD BLANK: 1202248 Matrix: Solid Associated Lab Samples: 40118960001, 40118960002, 40118960003, 40118960004

		Blank	Reporting		
Parameter	Units	Result	Limit	Analyzed	Qualifiers
Calcium	mg/kg	<2.7	100	08/05/15 12:35	
Lead	mg/kg	< 0.43	1.0	08/05/15 12:35	
Zinc	mg/kg	< 0.39	4.0	08/05/15 12:35	

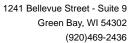
LABORATORY CONTROL SAMPLE: 1202249 Spike LCS LCS % Rec Parameter Units Conc. Result % Rec Limits Qualifiers Calcium mg/kg 500 500 100 80-120

Lead 50 49.3 99 80-120 mg/kg Zinc mg/kg 50 51.3 103 80-120

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1202250 1202251 MS MSD

		40118922007	Spike	Spike	MS	MSD	MS	MSD	% Rec		Max	
Parameter	Units	Result	Conc.	Conc.	Result	Result	% Rec	% Rec	Limits	RPD	RPD	Qual
Calcium	mg/kg	101000	591	591	99000	103000	-378	336	75-125	4	20	P6
Lead	mg/kg	6.7	59.1	59.1	59.6	58.5	90	88	75-125	2	20	
Zinc	mg/kg	45.0	59.1	59.1	97.8	100	89	93	75-125	2	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.





QUALITY CONTROL DATA

Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

QC Batch: PMST/11569 Analysis Method: ASTM D2974-87

QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture

Associated Lab Samples: 40118960001, 40118960002, 40118960003, 40118960004

SAMPLE DUPLICATE: 1201203

Date: 08/06/2015 02:41 PM

 Parameter
 Units
 40118995001 Result
 Dup Result
 Max RPD
 Max RPD
 Qualifiers

 Percent Moisture
 %
 4.9
 4.9
 1
 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.



QUALIFIERS

Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

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.

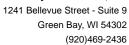
TNI - The NELAC Institute.

ANALYTE QUALIFIERS

Date: 08/06/2015 02:41 PM

D3 Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

P6 Matrix spike recovery was outside laboratory control limits due to a parent sample concentration notably higher than the spike level.





QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: 218938 WPS PHASE I ASH

Pace Project No.: 40118960

Date: 08/06/2015 02:41 PM

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40118960001	SAMPLE 19	EPA 3050	MPRP/12362	EPA 6010	ICP/10967
40118960002	SAMPLE 20	EPA 3050	MPRP/12362	EPA 6010	ICP/10967
40118960003	SAMPLE 19, 6-INCH DEEP	EPA 3050	MPRP/12362	EPA 6010	ICP/10967
40118960004	SAMPLE 20, 6-INCH DEEP	EPA 3050	MPRP/12362	EPA 6010	ICP/10967
40118960001	SAMPLE 19	ASTM D2974-87	PMST/11569		
40118960002	SAMPLE 20	ASTM D2974-87	PMST/11569		
40118960003	SAMPLE 19, 6-INCH DEEP	ASTM D2974-87	PMST/11569		
40118960004	SAMPLE 20, 6-INCH DEEP	ASTM D2974-87	PMST/11569		

						<i>\</i>	1	-			الكميي												ilia.												
Sa	Fax:	Telephone:	4	Fmail #1:		(Rush T)	Rush Tur							18	000 E	200	35	3	PACE LAB#	Era Level IV		(billable)	Data Package Options	PO #:	Sampled By (Sign):	Sampled By (Print):	Project State:	Project Name:		Project Number:	Phone:	Project Contact:	Branch/Location:	Company Name:	
Samples on HOLD are subject to special pricing and release of liability				Iransmit Pfelim Rush Results by (complete what you wait).	Date Needed:	(Rush TAT subject to approval/surcharge)	Rush Turnaround Time Requested - Prelims							ande 20, Oinch	simple 19, 6-inch	Sample CO	1/	Samala 10	CLIENT FIELD ID		(billable) NOT needed on	9	e Options MS/MSD	182862	X	rint): George Sw	TW	NES Trass	7,7,0	7	-25X-200	Tohn Hotes	m Madison	TRC	(Please Print Clearly)
Reling		Reling) ()	2	Relip	argenie.							,	de V	die		1/00	7/25	ΙE	S = Soil SI = Sludge	C = Charcoal O = Oil	A = Air B = Biota	Matri	Regulatory Program:	rell	ereda		ash			14401	COM -			
Relinquished By:		Relinquished By:		Relinquished By:	Wished By CA	Secret L	Relinguished By:							3 8	N B		7	J. 184	m	WW = Waste Water WP = Wipe	GW = Ground Water SW = Surface Water	W = Water DW = Drinking Water	Matrix Codes			PRESERVATION (CODE)*	(YES/NO)		3	A=None B=	<u> </u>	_			
					\ 	ING COC-	James Comments							X				X	6	Ana	lysi Za	es R	equ V	esto	d		N/A			B=HCL C=H2SO4 D	TAR OF		ACT MINITERS COM		<u> </u>
Date/Time:		Date/Time:		Date/Time:	N/M		Date/Time: //							>	X		\\ X\ -	X	7	ri l	re	d				1	1000	* * * * * * * * * * * * * * * * * * *	=Sodium Thiosulfate	*Preservation Codes D=HNO3 E=DI Water			An Idiyulda		
Rece		Rece		Race	シタ マ	2	1/2 Rece																				1	*	J=Other	F=Methanol	CUSTODY			TAILES	5451
Received By:		Received By:		aceived By:	とうとなる	12/2	Received By																							G=NaOH		1	37.	Š	
Dai		Dat	c	Dat	とうろう		H. Dar Dat							V	-			ングク	COMMENTS	CLMAT	III VOICE TO FIIOIRE.	laucica To Bh		Invoice To Address:	Invoice To Company:	Invoice To Contact:			Mail To Address:	Mail To Company:	Mail To Contact:	Quote #:		881. 020-100-2-100	ACPC-09F UCU Hear
Date/Time:		Date/Time:		Date/Time:	1B1//CO24	affilian:	Date/Time: 7/2/3/152										-	1			┢	9		ress:	pany:	tact:			Sec.	any:	act:			•	,,
Intact / Version 6.0 06/14/06	Present	Cooler Cr	Sample	Keceipi			.,,							4				TO M	(Lab Use Only)	LAB COMMENTS														UNIIR HOD	(
Intact / Not Intact	Present Hot Present	In Custody Spal	Sample Receipt pH	KOTi	7,0	000	PACE Project No.													Profile #												Pag		of 1	15

<u>UPPER MIDWEST REGION</u>
MN: 612-607-1700 WI: 920-469-2436

Page 1 of

Sample Condition Upon Receipt

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

Pace Analytical*		Drainat #	ПОШ		reen Bay, WI 543
Client Name:		Project #:	WU#	40118	960
Courier: Fed Ex T UPS T Client T Pa	on Other:			HEERIE IN EIN	
racking #: 78/0708258	30-		40118960		
custody Seal on Cooler/Box Present: yes	no Seals in	tact: 「yes 「no			
ustody Seal on Samples Present: 🔽 yes 🌡	. #	tact: T yes T no			
acking Material: Bubble Wrap Bul		lone C Other _			
hermometer Used	Type of Ice:(V	Vet) Blue Dry None	Samples	on ice, cooling proces	s has begun
ooler Temperature Uncorr: O /Corr:	B	iological Tissue is Fro	zen: T yes		
emp Blank Present: yes no		•	r no	Person examir	ing contents
emp should be above freezing to 6°C for all sample e rozen Biota Samples should be received ≤ 0°C.	xcept Biota.	Comments:		Date:	Ser
hain of Custody Present:	ØYes □No □	IN/A 1.			
Chain of Custody Filled Out:	Mayes □No □	IN/A 2.			
chain of Custody Relinquished:	72 Yes □No □	IN/A 3.	····		
ampler Name & Signature on COC:	¶Yes □No □	IN/A 4.	NAME OF THE OWNER O		
amples Arrived within Hold Time:	ØYes □No □	IN/A 5.			
- VOA Samples frozen upon receipt	□Yes □No	Date/Time:	•		
hort Hold Time Analysis (<72hr):	□Yes ØÎNo □	IN/A 6.			
ush Turn Around Time Requested:	Yes □No □	INVA 7. RUSH	1		7-345
ufficient Volume:	.∰Yes □No □	IN/A 8.			
Forrect Containers Used:	Øves □No □	In/A 9.			
-Pace Containers Used:	ØYes □No □	IN/A			
-Pace IR Containers Used:	□Yes □No □	froza			
ontainers Intact:	ØYes □No □	IN/A 10.	,		
iltered volume received for Dissolved tests	□Yes □No 🔽	NDA 11.			
ample Labels match COC:	ØYes □No □	IN/A 12.			
-Includes date/time/ID/Analysis Matrix:	S				
Il containers needing preservation have been checked	j.	(WA F HNO3	B F H2SO4	「 NaOH	OH +7nAct
Non-Compliance noted in 13.) It containers needing preservation are found to be in	□Yes □No 🖟	13.	, 112004	, 1.0011 ; 140	
ompliance with EPA recommendation.	□Yes □No □	AVA			
INO3, H2SO4 ≤2; NaOH+ZnAct ≥9, NaOH ≥12)		<u> </u>			
cceptions: VOA, coliform, TOC, TOX, TOH, &G, WIDROW, Phenolics, OTHER:	□Yes D TNo	Initial when completed	Lab Std #ID of preservative	Date/ Time:	
eadspace in VOA Vials (>6mm):	□Yes □No 【2	ÍN/A 14.			
rip Blank Present:		Ñ/A 15.			
rip Blank Custody Seals Present		PN/A			
ace Trip Blank Lot # (if purchased):					
lient Notification/ Resolution:			checked, see atta	ched form for addition	al comments
Person Contacted:	D D	ate/Time:	· /	Om not	
Comments/ Resolution: William C	ence COD	gray coc	in VIII	prest.	7-3/-15
	<u> </u>				- OCH
		-			
Project Manager Review:	WL		Date	: 7-31-1	<u>~</u>





August 31, 2015

Jonathan Hotstream TRC - Madison 708 Heartland Trail Madison, WI 53717

RE: Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

Dear Jonathan Hotstream:

Enclosed are the analytical results for sample(s) received by the laboratory on August 27, 2015. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI 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

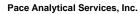
Tod nolteneya

tod.noltemeyer@pacelabs.com

Project Manager

Enclosures





Pace Analytical www.pacelabs.com

1241 Bellevue Street - Suite 9 Green Bay, WI 54302 (920)469-2436

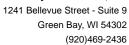
CERTIFICATIONS

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302 Florida/NELAP Certification #: E87948 Illinois Certification #: 200050 Kentucky Certification #: 82 Louisiana Certification #: 04168 Minnesota Certification #: 055-999-334 North Dakota Certification #: R-150 South Carolina Certification #: 83006001 Texas Certification #: T104704529-14-1 US Dept of Agriculture #: S-76505 Wisconsin Certification #: 405132750



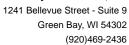


SAMPLE SUMMARY

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40120201001	CL-9	Solid	08/26/15 00:00	08/27/15 10:45
40120201002	CL-12	Solid	08/26/15 00:00	08/27/15 10:45
40120201003	CL-17	Solid	08/26/15 00:00	08/27/15 10:45
40120201004	CL-4	Solid	08/26/15 00:00	08/27/15 10:45





SAMPLE ANALYTE COUNT

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

Lab ID	Sample ID	Method	Analysts	Analytes Reported
40120201001	CL-9	EPA 6010	JBR	6
		ASTM D2974-87	MAM	1
40120201002	CL-12	EPA 6010	JBR	6
		ASTM D2974-87	MAM	1
40120201003	CL-17	EPA 6010	JBR	6
		ASTM D2974-87	MAM	1
40120201004	CL-4	EPA 6010	JBR	6
		ASTM D2974-87	MAM	1



PROJECT NARRATIVE

218938.0000 PH6 WPS CLAY & SED Project:

Pace Project No.: 40120201

Method: **EPA 6010** Description: 6010 MET ICP Client: TRC - MADISON Date: August 31, 2015

General Information:

4 samples were analyzed for EPA 6010. 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 3050 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.

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: MPRP/12497

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 40120201001

M0: Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

- MS (Lab ID: 1212270)
 - Boron
- MSD (Lab ID: 1212271)
 - Boron

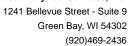
Additional Comments:

Analyte Comments:

QC Batch: MPRP/12497

D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

- CL-12 (Lab ID: 40120201002)
 - Arsenic
- CL-17 (Lab ID: 40120201003)
 - Arsenic
- CL-4 (Lab ID: 40120201004)
 - Arsenic





PROJECT NARRATIVE

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

Method:EPA 6010Description:6010 MET ICPClient:TRC - MADISONDate:August 31, 2015

Analyte Comments:

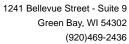
QC Batch: MPRP/12497

D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

• CL-9 (Lab ID: 40120201001)

Arsenic

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





Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

Date: 08/31/2015 02:41 PM

Sample: CL-9 Lab ID: 40120201001 Collected: 08/26/15 00:00 Received: 08/27/15 10:45 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	4.4J	mg/kg	5.1	1.6	2	08/27/15 15:02	08/28/15 16:23	7440-38-2	D3
Boron	237	mg/kg	12.8	0.40	1	08/27/15 15:02	08/28/15 15:23	7440-42-8	M0
Calcium	1950	mg/kg	128	3.5	1	08/27/15 15:02	08/28/15 15:23	7440-70-2	
Lead	6.9	mg/kg	2.6	1.1	2	08/27/15 15:02	08/28/15 16:23	7439-92-1	
Selenium	1.6J	mg/kg	2.6	0.99	1	08/27/15 15:02	08/28/15 15:23	7782-49-2	
Zinc	47.3	mg/kg	5.1	0.49	1	08/27/15 15:02	08/28/15 15:23	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	22.0	%	0.10	0.10	1		08/27/15 16:12		



ANALYTICAL RESULTS

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

Date: 08/31/2015 02:41 PM

Sample: CL-12 Lab ID: 40120201002 Collected: 08/26/15 00:00 Received: 08/27/15 10:45 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	<1.6	mg/kg	4.9	1.6	2	08/27/15 15:02	08/28/15 16:35	7440-38-2	D3
Boron	238	mg/kg	12.2	0.38	1	08/27/15 15:02	08/28/15 15:30	7440-42-8	
Calcium	2490	mg/kg	122	3.3	1	08/27/15 15:02	08/28/15 15:30	7440-70-2	
Lead	4.6	mg/kg	2.4	1.1	2	08/27/15 15:02	08/28/15 16:35	7439-92-1	
Selenium	<0.94	mg/kg	2.4	0.94	1	08/27/15 15:02	08/28/15 15:30	7782-49-2	
Zinc	62.0	mg/kg	4.9	0.47	1	08/27/15 15:02	08/28/15 15:30	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	26.6	%	0.10	0.10	1		08/27/15 16:13		



ANALYTICAL RESULTS

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

Date: 08/31/2015 02:41 PM

Sample: CL-17 Lab ID: 40120201003 Collected: 08/26/15 00:00 Received: 08/27/15 10:45 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	<1.5	mg/kg	4.8	1.5	2	08/27/15 15:02	08/28/15 16:37	7440-38-2	D3
Boron	194	mg/kg	12.0	0.37	1	08/27/15 15:02	08/28/15 15:32	7440-42-8	
Calcium	2600	mg/kg	120	3.3	1	08/27/15 15:02	08/28/15 15:32	7440-70-2	
Lead	4.1	mg/kg	2.4	1.0	2	08/27/15 15:02	08/28/15 16:37	7439-92-1	
Selenium	< 0.92	mg/kg	2.4	0.92	1	08/27/15 15:02	08/28/15 15:32	7782-49-2	
Zinc	36.2	mg/kg	4.8	0.46	1	08/27/15 15:02	08/28/15 15:32	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	21.2	%	0.10	0.10	1		08/27/15 16:13		



ANALYTICAL RESULTS

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

Date: 08/31/2015 02:41 PM

Sample: CL-4 Lab ID: 40120201004 Collected: 08/26/15 00:00 Received: 08/27/15 10:45 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	<1.4	mg/kg	4.4	1.4	2	08/27/15 15:02	08/28/15 16:40	7440-38-2	D3
Boron	162	mg/kg	11.0	0.34	1	08/27/15 15:02	08/28/15 15:39	7440-42-8	
Calcium	1620	mg/kg	110	3.0	1	08/27/15 15:02	08/28/15 15:39	7440-70-2	
Lead	5.2	mg/kg	2.2	0.95	2	08/27/15 15:02	08/28/15 16:40	7439-92-1	
Selenium	<0.85	mg/kg	2.2	0.85	1	08/27/15 15:02	08/28/15 15:39	7782-49-2	
Zinc	39.0	mg/kg	4.4	0.42	1	08/27/15 15:02	08/28/15 15:39	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	19.7	%	0.10	0.10	1		08/27/15 16:13		



QUALITY CONTROL DATA

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

LABORATORY CONTROL SAMPLE:

Zinc

Date: 08/31/2015 02:41 PM

QC Batch: MPRP/12497 Analysis Method: EPA 6010
QC Batch Method: EPA 3050 Analysis Description: 6010 MET

Associated Lab Samples: 40120201001, 40120201002, 40120201003, 40120201004

METHOD BLANK: 1212268 Matrix: Solid

Associated Lab Samples: 40120201001, 40120201002, 40120201003, 40120201004

1212269

mg/kg

47.3

64.1

		Blank	Reporting		
Parameter	Units	Result	Limit	Analyzed	Qualifiers
Arsenic	mg/kg	<0.64	2.0	08/28/15 15:19	
Boron	mg/kg	0.43J	10.0	08/28/15 15:19	
Calcium	mg/kg	2.9J	100	08/28/15 15:19	
Lead	mg/kg	< 0.43	1.0	08/28/15 15:19	
Selenium	mg/kg	< 0.77	2.0	08/28/15 15:19	
Zinc	mg/kg	< 0.39	4.0	08/28/15 15:19	

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/kg	50	50.5	101	80-120	
Boron	ma/ka	50	49 7	99	80-120	

mg/kg 500 105 Calcium mg/kg 525 80-120 51.1 102 80-120 Lead mg/kg 50 Selenium mg/kg 50 51.2 102 80-120 Zinc mg/kg 50 53.6 107 80-120

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1212270 1212271 MS MSD 40120201001 MS MSD MS MSD Spike Spike % Rec Max Parameter Units Result Conc. Conc. Result Result % Rec % Rec Limits RPD RPD Qual Arsenic mg/kg 4.4J 64.1 64.1 65.0 63.8 95 93 75-125 2 20 Boron mg/kg 237 64.1 64.1 354 349 183 175 75-125 1 20 M0 Calcium 1950 2550 75-125 0 20 mg/kg 641 641 2570 95 94 Lead mg/kg 6.9 64.1 64.1 69.3 68.4 97 96 75-125 1 20 Selenium mg/kg 1.6J 64.1 64.1 62.3 60.6 95 92 75-125 3 20

64.1

110

108

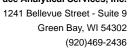
98

95

75-125

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.





QUALITY CONTROL DATA

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

QC Batch: PMST/11692 Analysis Method: ASTM D2974-87

QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture

Associated Lab Samples: 40120201001, 40120201002, 40120201003, 40120201004

SAMPLE DUPLICATE: 1212378

Date: 08/31/2015 02:41 PM

40120202003 Dup Max Parameter Units Result Result **RPD** RPD Qualifiers 25.1 % Percent Moisture 24.8 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.



QUALIFIERS

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

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.

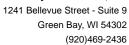
TNI - The NELAC Institute.

ANALYTE QUALIFIERS

Date: 08/31/2015 02:41 PM

D3 Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

M0 Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.





QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120201

Date: 08/31/2015 02:41 PM

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40120201001	CL-9	EPA 3050	MPRP/12497	EPA 6010	ICP/11077
40120201002	CL-12	EPA 3050	MPRP/12497	EPA 6010	ICP/11077
40120201003	CL-17	EPA 3050	MPRP/12497	EPA 6010	ICP/11077
40120201004	CL-4	EPA 3050	MPRP/12497	EPA 6010	ICP/11077
40120201001	CL-9	ASTM D2974-87	PMST/11692		
40120201002	CL-12	ASTM D2974-87	PMST/11692		
40120201003	CL-17	ASTM D2974-87	PMST/11692		
40120201004	CL-4	ASTM D2974-87	PMST/11692		

Sample Condition Upon Receipt

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

Pace Analytical"

Client Name: TRC		Project #:	WO#:4	01202	201
Courier: Fed Ex F UPS F Client F Pac Tracking #: 1812 21.008 012 Custody Seal on Cooler/Box Present: Fyes	no Seals intact	yes no	40120201		
Custody Seal on Samples Present: yes Packing Material: Bubble Wrap Bub Thermometer Used A		e Cother	Samples on ic	e, cooling proces	s has becun
Cooler Temperature Uncor: /Corr:		gical Tissue is Froz			
Temp Blank Present:	cept Biota.	Comments:	. 1	Person examin Date: \$12 Initials: \$2	ing contents:
Chain of Custody Present:	ZYes DNo DN/A				
Chain of Custody Filled Out:	□Yes ZNo □N/A	2.00 times	ldates, m	atrix	KS 8127/
Chain of Custody Relinquished:	ZYes ONO ON/A	1			131 4/4/
Sampler Name & Signature on COC:	ØYes □No □N/A	4.			
Samples Arrived within Hold Time: - VOA Samples frozen upon receipt	ZYes DNo DN/A				
Short Hold Time Analysis (<72hr):	Dyes ONo	Date/Time:		:	
	□Yes ØNo □N/A				0 9405#
Rush Turn Around Time Requested:		7. 8/3\		•	KA 812711
Sufficient Volume:	ZYes ONo ON/A			***	·
Correct Containers Used:	ØYes □No □N/A	9.		*	
-Pace Containers Used:	□Yes ZNo □N/A	•			
-Pace IR Containers Used:	□Yes □No ØÑ/A				·
Containers Intact:	ZYes DNo DN/A				
Filtered volume received for Dissolved tests	DYes DNo ZN/A				
Sample Labels match COC:		12.00 times	ydates		į
-Includes date/time/ID/Analysis Matrix: All containers needing preservation have been checked.	CYes □No ØN/A	F HNO3	□ H2SO4 □ I	NaOH E Na	KR 8127/
(Non-Compliance noted in 13.) All containers needing preservation are found to be in compliance with EPA recommendation. (HNO3, H2SO4 ≤2; NaOH+ZnAct ≥9, NaOH ≥12)	Oyes One Mila	13.	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	; ;	
exceptions: VOA, coliform, TOC, TOX, TOH, D&G, WIDROW, Phenolics, OTHER:			b Std #ID of eservative	Date/ Time:	
leadspace in VOA Vials (>6mm):	□Yes □No ØN/A	14.			
Frip Blank Present:	□Yes □No ØN/A	15.			
Frip Blank Custody Seals Present	□Yes □No ØN/A			•	
Pace Trip Blank Lot # (if purchased): Client Notification/ Resolution; Person Contacted:	Date/T		cked, see attached t	form for additiona	comments
5 t- 4 t 5 t t 5 t 5 t 5 t 5 t 5 t 5 t 5 t 5	Date/T		Date:	form for additiona	comments [

F-GB-C-031-Rev.03 (9April2015) SCUR Form

Email #1: elephone: mall #2: PACE LAB # Sampled By (Sign): Transmit Prelim Rush Results by (complete what you want): C019a(27Jun2006) Data Package Options
(billable) Sampled By (Print): 8 800 Rush Turnaround Time Requested - Prelims 282 8 EPA Level III EPA Level IV special pricing and release of liability Samples on HOLD are subject to CLIENT FIELD ID WALK WILLIAM -NOT needed on your sample On your sample MS/MSD (billable) Regulatory Program: DATE Relinquished By Relinquished By:
Relinquished By: delinquished By elinquished By:

Warth Will **Matrix Codes** W = Water
DW = Drinking Water
GW = Ground Water
SW = Surface Water
WW = Waste Water PRESERVATION (CODE)* S. S. S. **Analyses Requested** METALS - BOROW, CALCIUM, LEAD, ZNC 8/26/15 Arsenic, Selenium Date/Time Date/Time SiSap Received By:

Focal very Control of the Processive of By: Received By Received By: Received By: Invoice To Company: Invoice To Address: **Invoice To Contact:** Invoice To Phone: COMMENTS CLIENT Date/Time:

8/27//5

Date/Time: Date/Time: Date/Time: Date/Time: 1-203p# LAB COMMENTS (Lab Use Only) Receipt Temp = (C) Present / Not Present 40120201 Cooler Custody Seal Intact / Not Intact Sample Receipt pH OK / Adjusted

റ്

Face Analytical*

Project State: Project Name: Project Number:

Phone:

218938,0000 PHU 108-824-2623

WPS CLAY (SED BASIN

CHARACTE

FILTERED? (YES/NO)

YIN

H=Sodium Bisulfate Solution

*Preservation Codes

Preservation Codes

B=HCL C=H2SO4 D=HNO3 E=DI Water F=Methanol G=NaOH CHAIN OF CUSTODY

Mail To Company: Mail To Address:

Profile #

Mail To Contact:

Quote #:

I=Sodium Thiosulfate

Branch/Location: Company Name:

MADISON, W

JON STHAN HOTSTREAM

(Please Print Clearly)

20

Project Contact:

UPPER MIDWEST REGION

MN: 612-607-1700 WI: 920-469-2436

Page

age 17 of 18

Sample Condition Upon Receipt

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

Pace Analytical*

			Project #:	MO#:	401202	201
Client Name: TRC						
Courier: Fed Ex TUPS T Client T Pac Tracking #: 1812 2608 612	e Other:					
^ / · · ^ · · · · · · · · · · ·	no Seals	intoot	yes 🗆 no 🔒	40120201		
Custody Seal on Samples Present: yes			yes no	⁵ 6	:	
Packing Material: F Bubble Wrap F Bubb						
Thermometer UsedA			Blue Dry None	✓ Samples	on ice, cooling proces	s has begun
Cooler Temperature Uncorr: /Corr: F			gical Tissue is Fro	/		J
Temp Blank Present: yes no				☐ no	Person examir	ning contents:
Temp should be above freezing to 6°C for all sample exc	ept Biota.		_		Date: 8/2	-6/15_
Frozen Biota Samples should be received ≤ 0°C.			Comments:		Initials.	9
Chain of Custody Present:		□n/a				
Chain of Custody Filled Out:		□n/a	2.00 times	dates.	matrix	Kg 8/27/1
Chain of Custody Relinquished:	ZYes □No	□n/a	3.			
Sampler Name & Signature on COC:	√Yes □No	□n/a	4.			
Samples Arrived within Hold Time:	ØYes □No	□n/a	5.			
- VOA Samples frozen upon receipt	□Yes □No		Date/Time:	•		
Short Hold Time Analysis (<72hr):	□Yes Ø No	□n/a	6.		:	
Rush Turn Around Time Requested:	ZYes □No	□n/a	7. 8/3\		:	K& 812711
Sufficient Volume:	ØYes □No	□n/a	8.			
Correct Containers Used:	ØYes □No	□n/a	9.		-	
-Pace Containers Used:	_ □Yes ZÎNo	□n/a				
-Pace IR Containers Used:	-	ZŃ/A				
Containers Intact:	ØYes □No	□N/A	10.			-
Filtered volume received for Dissolved tests	□Yes □No	ØN/A	11.			
Sample Labels match COC:	□Yes Z No	□n/a	12. no time	s/dates		
-Includes date/time/ID/Analysis Matrix:	S					K8 8127
All containers needing preservation have been checked.	□Yes □No	TANKA.	. T HNO3	T H2SO4	Г NaOH Г Na	
(Non-Compliance noted in 13.) All containers needing preservation are found to be in		yelvin.	13.	·		
compliance with EPA recommendation.	□Yes □No	ZIN/A				
(HNO3, H2SO4 ≤2; NaOH+ZnAct ≥9, NaOH ≥12) exceptions: VOA, coliform, TOC, TOX, TOH,			Initial when L	ab Std #ID of	Date/	
D&G, WIDROW, Phenolics, OTHER:	□Yes ZÎNo		completed	preservative	Time:	
Headspace in VOA Vials (>6mm):	□Yes □No	ZN/A	14.			
Trip Blank Present:	□Yes □No	ZN/A	15.			
Trip Blank Custody Seals Present	□Yes □No	ZN/A				
Pace Trip Blank Lot # (if purchased):						
Client Notification/ Resolution: Person Contacted:	1	Date/T		necked, see attac	ched form for addition	ai comments
Person Contacted: Comments/ Resolution:		Jule/ 1				
					<u> </u>	
						*
Project Manager Review:	to AAA	A.	TNI	Date:	8/2-1	/5
i ioject manager Keview.	1110011	V UT	1 / V			





September 01, 2015

Jonathan Hotstream TRC - Madison 708 Heartland Trail Madison, WI 53717

RE: Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Dear Jonathan Hotstream:

Enclosed are the analytical results for sample(s) received by the laboratory on August 28, 2015. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI 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

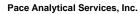
Tod nolteneya

tod.noltemeyer@pacelabs.com

Project Manager

Enclosures





Pace Analytical www.pacelabs.com

1241 Bellevue Street - Suite 9 Green Bay, WI 54302 (920)469-2436

CERTIFICATIONS

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302 Florida/NELAP Certification #: E87948 Illinois Certification #: 200050 Kentucky Certification #: 82 Louisiana Certification #: 04168 Minnesota Certification #: 055-999-334 North Dakota Certification #: R-150 South Carolina Certification #: 83006001 Texas Certification #: T104704529-14-1 US Dept of Agriculture #: S-76505 Wisconsin Certification #: 405132750



SAMPLE SUMMARY

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40120281001	CL-14-4	Solid	08/27/15 00:00	08/28/15 10:10
40120281002	CL-14-5	Solid	08/27/15 00:00	08/28/15 10:10
40120281003	CL-14-2	Solid	08/27/15 00:00	08/28/15 10:10
40120281004	CL-16-4	Solid	08/27/15 00:00	08/28/15 10:10
40120281005	CL-16-5	Solid	08/27/15 00:00	08/28/15 10:10
40120281006	CL-25-5	Solid	08/27/15 00:00	08/28/15 10:10
40120281007	CL-24-2	Solid	08/27/15 00:00	08/28/15 10:10
40120281008	CL-24-5	Solid	08/27/15 00:00	08/28/15 10:10
40120281009	CL-25-4	Solid	08/27/15 00:00	08/28/15 10:10
40120281010	CL-25-2	Solid	08/27/15 00:00	08/28/15 10:10
40120281011	CL-25-1	Solid	08/27/15 00:00	08/28/15 10:10
40120281012	CL-24-4	Solid	08/27/15 00:00	08/28/15 10:10
40120281013	CL-2-2	Solid	08/27/15 00:00	08/28/15 10:10
40120281014	CL-8-2	Solid	08/27/15 00:00	08/28/15 10:10
40120281015	CL-2-4	Solid	08/27/15 00:00	08/28/15 10:10
40120281016	CL-8-4	Solid	08/27/15 00:00	08/28/15 10:10
40120281017	CL-8-5	Solid	08/27/15 00:00	08/28/15 10:10
40120281018	CL-2-5	Solid	08/27/15 00:00	08/28/15 10:10
40120281019	CL-18-4	Solid	08/27/15 00:00	08/28/15 10:10
40120281020	CL-18-5	Solid	08/27/15 00:00	08/28/15 10:10
40120281021	CL-10-5	Solid	08/27/15 00:00	08/28/15 10:10
40120281022	CL-10-2	Solid	08/27/15 00:00	08/28/15 10:10
40120281023	CL-18-2	Solid	08/27/15 00:00	08/28/15 10:10
40120281024	CL-16-2	Solid	08/27/15 00:00	08/28/15 10:10
40120281025	CL-10-4	Solid	08/27/15 00:00	08/28/15 10:10
40120281026	CL-25	Solid	08/27/15 00:00	08/28/15 10:10
40120281027	CL-2	Solid	08/27/15 00:00	08/28/15 10:10
40120281028	CL-8	Solid	08/27/15 00:00	08/28/15 10:10
40120281029	CL-24	Solid	08/27/15 00:00	08/28/15 10:10
40120281030	CL-10	Solid	08/27/15 00:00	08/28/15 10:10
40120281031	CL-18	Solid	08/27/15 00:00	08/28/15 10:10
40120281032	CL-16	Solid	08/27/15 00:00	08/28/15 10:10
40120281033	CL-14	Solid	08/27/15 00:00	08/28/15 10:10
40120281033	CL-14	Solid	08/27/15 00:00	08/28/15 1



SAMPLE ANALYTE COUNT

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Lab ID	Sample ID	Method	Analysts	Analytes Reported	
		ASTM D2974-87	AH	1	
40120281020	CL-18-5	EPA 6010	JBR	4	
		ASTM D2974-87	АН	1	
40120281021	CL-10-5	EPA 6010	JBR	4	
		ASTM D2974-87	АН	1	
0120281022	CL-10-2	EPA 6010	JBR	4	
		ASTM D2974-87	AH	1	
10120281023	CL-18-2	EPA 6010	JBR	4	
		ASTM D2974-87	AH	1	
10120281024	CL-16-2	EPA 6010	JBR	4	
		ASTM D2974-87	AH	1	
0120281025	CL-10-4	EPA 6010	JBR	4	
		ASTM D2974-87	AH	1	
0120281026	CL-25	EPA 6010	JBR	6	
		ASTM D2974-87	AH	1	
0120281027	CL-2	EPA 6010	JBR	6	
		ASTM D2974-87	AH	1	
0120281028	CL-8	EPA 6010	JBR	6	
		ASTM D2974-87	AH	1	
0120281029	CL-24	EPA 6010	JBR	6	
		ASTM D2974-87	AH	1	
40120281030	CL-10	EPA 6010	JBR	6	
		ASTM D2974-87	AH	1	
0120281031	CL-18	EPA 6010	JBR	6	
		ASTM D2974-87	AH	1	
0120281032	CL-16	EPA 6010	JBR	6	
		ASTM D2974-87	АН	1	
10120281033	CL-14	EPA 6010	JBR	6	
		ASTM D2974-87	CMP	1	



PROJECT NARRATIVE

218938.0000 PH6 WPS CLAY & SED Project:

Pace Project No.: 40120281

Method: **EPA 6010** Description: 6010 MET ICP Client: TRC - MADISON Date: September 01, 2015

General Information:

33 samples were analyzed for EPA 6010. 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 3050 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.

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: MPRP/12502

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 40120280021

M0: Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

- MS (Lab ID: 1212811)
 - Boron
- MSD (Lab ID: 1212812)
 - Boron

QC Batch: MPRP/12504

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 40120281017

M0: Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

- MS (Lab ID: 1212854)
 - Calcium
- MSD (Lab ID: 1212855)
 - Calcium

R1: RPD value was outside control limits.

- MS (Lab ID: 1212854)
 - Calcium
- MSD (Lab ID: 1212855)



PROJECT NARRATIVE

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Method: EPA 6010
Description: 6010 MET ICP
Client: TRC - MADISON
Date: September 01, 2015

QC Batch: MPRP/12504

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 40120281017

R1: RPD value was outside control limits.

Calcium

Additional Comments:

Analyte Comments:

QC Batch: MPRP/12502

D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

- CL-14-2 (Lab ID: 40120281003)
 - Arsenic
- CL-14-4 (Lab ID: 40120281001)
 - Arsenic
 - Lead
- CL-16-4 (Lab ID: 40120281004)
 - Arsenic
- CL-2-2 (Lab ID: 40120281013)
 - Arsenic
- CL-24-2 (Lab ID: 40120281007)
 - Arsenic
- CL-24-4 (Lab ID: 40120281012)
 - Arsenic
 - Lead
- CL-24-5 (Lab ID: 40120281008)
 - Arsenic
 - Lead
- CL-25-1 (Lab ID: 40120281011)
 - Arsenic
- CL-25-2 (Lab ID: 40120281010)
 - Arsenic
 - Lead
- CL-25-4 (Lab ID: 40120281009)
 - Arsenic
 - Lead
- CL-8-2 (Lab ID: 40120281014)
 - Arsenic
- CL-8-4 (Lab ID: 40120281016)
 - Arsenic
 - Lead

QC Batch: MPRP/12504

D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

- CL-10 (Lab ID: 40120281030)
 - Arsenic
 - Lead



PROJECT NARRATIVE

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Method: EPA 6010
Description: 6010 MET ICP
Client: TRC - MADISON
Date: September 01, 2015

Analyte Comments:

QC Batch: MPRP/12504

D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

- CL-10-2 (Lab ID: 40120281022)
 - Arsenic
- CL-10-4 (Lab ID: 40120281025)
 - Arsenic
- CL-14 (Lab ID: 40120281033)
 - Arsenic
- CL-16 (Lab ID: 40120281032)
 - Arsenic
- CL-18 (Lab ID: 40120281031)
 - Arsenic
- CL-18-2 (Lab ID: 40120281023)
 - Arsenic
- CL-18-4 (Lab ID: 40120281019)
 - Arsenic
 - Lead
- CL-18-5 (Lab ID: 40120281020)
 - Arsenic
- CL-2 (Lab ID: 40120281027)
 - Arsenic
- CL-2-5 (Lab ID: 40120281018)
 - Arsenic
- CL-24 (Lab ID: 40120281029)
 - Arsenic
 - Lead
- CL-25 (Lab ID: 40120281026)
 - Arsenic
- CL-8 (Lab ID: 40120281028)
 - Arsenic

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



ANALYTICAL RESULTS

Project: 218938.0000 PH6 WPS CLAY & SED

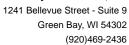
Pace Project No.: 40120281

Date: 09/01/2015 03:24 PM

Sample: CL-25 Lab ID: 40120281026 Collected: 08/27/15 00:00 Received: 08/28/15 10:10 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	<1.5	mg/kg	4.7	1.5	2	08/28/15 14:09	08/31/15 18:45	7440-38-2	D3
Boron	135	mg/kg	11.8	0.37	1	08/28/15 14:09	08/31/15 21:16	7440-42-8	
Calcium	2030	mg/kg	118	3.2	1	08/28/15 14:09	08/31/15 21:16	7440-70-2	
Lead	3.1	mg/kg	2.4	1.0	2	08/28/15 14:09	08/31/15 18:45	7439-92-1	
Selenium	<0.91	mg/kg	2.4	0.91	1	08/28/15 14:09	08/31/15 21:16	7782-49-2	
Zinc	26.8	mg/kg	4.7	0.45	1	08/28/15 14:09	08/31/15 21:16	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	19.9	%	0.10	0.10	1		08/31/15 08:32		





Project: 218938.0000 PH6 WPS CLAY & SED

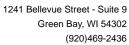
Pace Project No.: 40120281

Date: 09/01/2015 03:24 PM

Sample: CL-2 Lab ID: 40120281027 Collected: 08/27/15 00:00 Received: 08/28/15 10:10 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	2.7J	mg/kg	4.7	1.5	2	08/28/15 14:09	08/31/15 18:47	7440-38-2	D3
Boron	116	mg/kg	11.8	0.37	1	08/28/15 14:09	08/31/15 21:19	7440-42-8	
Calcium	1630	mg/kg	118	3.2	1	08/28/15 14:09	08/31/15 21:19	7440-70-2	
Lead	5.0	mg/kg	2.4	1.0	2	08/28/15 14:09	08/31/15 18:47	7439-92-1	
Selenium	<0.91	mg/kg	2.4	0.91	1	08/28/15 14:09	08/31/15 21:19	7782-49-2	
Zinc	31.3	mg/kg	4.7	0.45	1	08/28/15 14:09	08/31/15 21:19	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	22.5	%	0.10	0.10	1		08/31/15 08:32		





Project: 218938.0000 PH6 WPS CLAY & SED

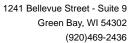
Pace Project No.: 40120281

Date: 09/01/2015 03:24 PM

Sample: CL-8 Lab ID: 40120281028 Collected: 08/27/15 00:00 Received: 08/28/15 10:10 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	2.6J	mg/kg	4.6	1.5	2	08/28/15 14:09	08/31/15 18:50	7440-38-2	D3
Boron	163	mg/kg	11.5	0.36	1	08/28/15 14:09	08/31/15 21:21	7440-42-8	
Calcium	2410	mg/kg	115	3.1	1	08/28/15 14:09	08/31/15 21:21	7440-70-2	
Lead	4.3	mg/kg	2.3	0.99	2	08/28/15 14:09	08/31/15 18:50	7439-92-1	
Selenium	<0.88	mg/kg	2.3	0.88	1	08/28/15 14:09	08/31/15 21:21	7782-49-2	
Zinc	29.1	mg/kg	4.6	0.44	1	08/28/15 14:09	08/31/15 21:21	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	21.2	%	0.10	0.10	1		08/31/15 08:32		





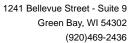
Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Date: 09/01/2015 03:24 PM

Sample: CL-24 Lab ID: 40120281029 Collected: 08/27/15 00:00 Received: 08/28/15 10:10 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	<1.4	mg/kg	4.4	1.4	2	08/28/15 14:09	08/31/15 18:52	7440-38-2	D3
Boron	123	mg/kg	11.1	0.35	1	08/28/15 14:09	08/31/15 21:23	7440-42-8	
Calcium	1400	mg/kg	111	3.0	1	08/28/15 14:09	08/31/15 21:23	7440-70-2	
Lead	< 0.96	mg/kg	2.2	0.96	2	08/28/15 14:09	08/31/15 18:52	7439-92-1	D3
Selenium	<0.86	mg/kg	2.2	0.86	1	08/28/15 14:09	08/31/15 21:23	7782-49-2	
Zinc	45.1	mg/kg	4.4	0.43	1	08/28/15 14:09	08/31/15 21:23	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	20.2	%	0.10	0.10	1		08/31/15 08:32		





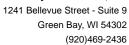
Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Date: 09/01/2015 03:24 PM

Sample: CL-10 Lab ID: 40120281030 Collected: 08/27/15 00:00 Received: 08/28/15 10:10 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	1.9J	mg/kg	5.2	1.6	2	08/28/15 14:09	08/31/15 18:54	7440-38-2	D3
Boron	120	mg/kg	12.9	0.40	1	08/28/15 14:09	08/31/15 21:25	7440-42-8	
Calcium	1900	mg/kg	129	3.5	1	08/28/15 14:09	08/31/15 21:25	7440-70-2	
Lead	1.1J	mg/kg	2.6	1.1	2	08/28/15 14:09	08/31/15 18:54	7439-92-1	D3
Selenium	<1.0	mg/kg	2.6	1.0	1	08/28/15 14:09	08/31/15 21:25	7782-49-2	
Zinc	15.4	mg/kg	5.2	0.50	1	08/28/15 14:09	08/31/15 21:25	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	24.1	%	0.10	0.10	1		08/31/15 08:32		





ANALYTICAL RESULTS

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Date: 09/01/2015 03:24 PM

Sample: CL-18 Lab ID: 40120281031 Collected: 08/27/15 00:00 Received: 08/28/15 10:10 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	3.1J	mg/kg	4.9	1.5	2	08/28/15 14:09	08/31/15 18:56	7440-38-2	D3
Boron	129	mg/kg	12.2	0.38	1	08/28/15 14:09	08/31/15 21:27	7440-42-8	
Calcium	1880	mg/kg	122	3.3	1	08/28/15 14:09	08/31/15 21:27	7440-70-2	
Lead	4.0	mg/kg	2.4	1.0	2	08/28/15 14:09	08/31/15 18:56	7439-92-1	
Selenium	< 0.94	mg/kg	2.4	0.94	1	08/28/15 14:09	08/31/15 21:27	7782-49-2	
Zinc	56.0	mg/kg	4.9	0.47	1	08/28/15 14:09	08/31/15 21:27	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	21.6	%	0.10	0.10	1		08/31/15 08:32		



ANALYTICAL RESULTS

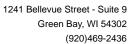
Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Date: 09/01/2015 03:24 PM

Sample: CL-16 Lab ID: 40120281032 Collected: 08/27/15 00:00 Received: 08/28/15 10:10 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	3.1J	mg/kg	4.9	1.6	2	08/28/15 14:09	08/31/15 18:58	7440-38-2	D3
Boron	104	mg/kg	12.3	0.39	1	08/28/15 14:09	08/31/15 21:29	7440-42-8	
Calcium	1820	mg/kg	123	3.4	1	08/28/15 14:09	08/31/15 21:29	7440-70-2	
Lead	5.2	mg/kg	2.5	1.1	2	08/28/15 14:09	08/31/15 18:58	7439-92-1	
Selenium	<0.95	mg/kg	2.5	0.95	1	08/28/15 14:09	08/31/15 21:29	7782-49-2	
Zinc	32.4	mg/kg	4.9	0.48	1	08/28/15 14:09	08/31/15 21:29	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	20.8	%	0.10	0.10	1		08/31/15 08:33		





ANALYTICAL RESULTS

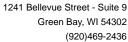
Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Date: 09/01/2015 03:24 PM

Sample: CL-14 Lab ID: 40120281033 Collected: 08/27/15 00:00 Received: 08/28/15 10:10 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	3.0J	mg/kg	4.8	1.5	2	08/28/15 14:09	08/31/15 19:05	7440-38-2	D3
Boron	153	mg/kg	12.1	0.38	1	08/28/15 14:09	08/31/15 21:32	7440-42-8	
Calcium	1850	mg/kg	121	3.3	1	08/28/15 14:09	08/31/15 21:32	7440-70-2	
Lead	5.2	mg/kg	2.4	1.0	2	08/28/15 14:09	08/31/15 19:05	7439-92-1	
Selenium	< 0.93	mg/kg	2.4	0.93	1	08/28/15 14:09	08/31/15 21:32	7782-49-2	
Zinc	43.9	mg/kg	4.8	0.47	1	08/28/15 14:09	08/31/15 21:32	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	24.1	%	0.10	0.10	1		08/28/15 17:23		





Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

Date: 09/01/2015 03:24 PM

QC Batch: MPRP/12502 Analysis Method: EPA 6010
QC Batch Method: EPA 3050 Analysis Description: 6010 MET

Associated Lab Samples: 40120281001, 40120281002, 40120281003, 40120281004, 40120281005, 40120281006, 40120281007,

40120281008, 40120281009, 40120281010, 40120281011, 40120281012, 40120281013, 40120281014,

40120281015, 40120281016

METHOD BLANK: 1212809 Matrix: Solid

Associated Lab Samples: 40120281001, 40120281002, 40120281003, 40120281004, 40120281005, 40120281006, 40120281007,

40120281008, 40120281009, 40120281010, 40120281011, 40120281012, 40120281013, 40120281014,

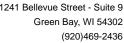
40120281015, 40120281016

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Arsenic	mg/kg	<0.64	2.0	08/31/15 12:02	
Boron	mg/kg	<0.31	10.0	08/31/15 12:02	
Lead	mg/kg	< 0.43	1.0	08/31/15 12:02	
Selenium	mg/kg	<0.77	2.0	08/31/15 12:02	

LABORATORY CONTROL SAMPLE:	1212810	Spike	LCS	LCS	% Rec	
Parameter	Units	Conc.	Result	% Rec	Limits	Qualifiers
Arsenic	mg/kg	50	50.4	101	80-120	
Boron	mg/kg	50	48.3	97	80-120	
Lead	mg/kg	50	50.6	101	80-120	
Selenium	mg/kg	50	50.8	102	80-120	

MATRIX SPIKE & MATRIX SPI	KE DUPLICA	ATE: 12128	11		1212812							
			MS	MSD								
	4	0120280021	Spike	Spike	MS	MSD	MS	MSD	% Rec		Max	
Parameter	Units	Result	Conc.	Conc.	Result	Result	% Rec	% Rec	Limits	RPD	RPD	Qual
Arsenic	mg/kg	1.7J	65.6	65.9	60.8	61.4	90	91	75-125	1	20	
Boron	mg/kg	123	65.6	65.9	243	234	182	168	75-125	4	20	M0
Lead	mg/kg	4.3	65.6	65.9	67.5	67.6	96	96	75-125	0	20	
Selenium	mg/kg	<1.0	65.6	65.9	58.0	60.2	87	90	75-125	4	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.





Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

QC Batch: MPRP/12504 Analysis Method: EPA 6010
QC Batch Method: EPA 3050 Analysis Description: 6010 MET

Associated Lab Samples: 40120281017, 40120281018, 40120281019, 40120281020, 40120281021, 40120281022, 40120281023,

40120281024, 40120281025, 40120281026, 40120281027, 40120281028, 40120281029, 40120281030,

40120281031, 40120281032, 40120281033

METHOD BLANK: 1212852 Matrix: Solid

Associated Lab Samples: 40120281017, 40120281018, 40120281019, 40120281020, 40120281021, 40120281022, 40120281023,

40120281024, 40120281025, 40120281026, 40120281027, 40120281028, 40120281029, 40120281030,

40120281031, 40120281032, 40120281033

		Blank	Reporting		
Parameter	Units	Result	Limit	Analyzed	Qualifiers
Arsenic	mg/kg	<0.64	2.0	08/31/15 18:12	
Boron	mg/kg	<0.31	10.0	08/31/15 18:12	
Calcium	mg/kg	<2.7	100	08/31/15 18:12	
Lead	mg/kg	< 0.43	1.0	08/31/15 18:12	
Selenium	mg/kg	<0.77	2.0	08/31/15 18:12	
Zinc	mg/kg	< 0.39	4.0	08/31/15 18:12	

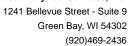
LABORATORY CONTROL SAMPL	LE: 12128	53
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Date: 09/01/2015 03:24 PM

		Spike	LCS	LCS	% Rec	
Parameter	Units	Conc.	Result	% Rec	Limits	Qualifiers
Arsenic	mg/kg	50	49.5	99	80-120	
Boron	mg/kg	50	47.3	95	80-120	
Calcium	mg/kg	500	509	102	80-120	
Lead	mg/kg	50	49.9	100	80-120	
Selenium	mg/kg	50	50.4	101	80-120	
Zinc	mg/kg	50	52.1	104	80-120	

MATRIX SPIKE & MATRIX	SPIKE DUPLICA	TE: 12128	54		1212855							
Parameter	4 Units	0120281017 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Arsenic	mg/kg	1.7J	51.2	51.4	50.3	49.1	95	92	 75-125	2	20	
Boron	mg/kg	3.4J	51.2	51.4	53.1	51.5	97	94	75-125	3	20	
Calcium	mg/kg	1770	512	514	2570	1890	156	24	75-125	30	20	M0,R1
Lead	mg/kg	2.7	51.2	51.4	51.2	50.0	95	92	75-125	2	20	
Selenium	mg/kg	< 0.79	51.2	51.4	48.3	48.8	93	94	75-125	1	20	
Zinc	mg/kg	19.5	51.2	51.4	69.3	68.0	97	94	75-125	2	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.





Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

QC Batch: PMST/11697 Analysis Method: ASTM D2974-87

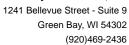
QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture

Associated Lab Samples: 40120281008, 40120281009, 40120281010, 40120281011, 40120281012

SAMPLE DUPLICATE: 1213075

Date: 09/01/2015 03:24 PM

ParameterUnits40120292004 ResultDup ResultMax RPDMax RPDPercent Moisture%47.446.8110





Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

QC Batch: PMST/11698 Analysis Method: ASTM D2974-87

QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture

Associated Lab Samples: 40120281001, 40120281002, 40120281003, 40120281004, 40120281005, 40120281006, 40120281007

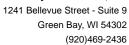
SAMPLE DUPLICATE: 1213080

Date: 09/01/2015 03:24 PM

Percent Moisture

40120280023 Dup Max
Result Result RPD RPD Qualifiers

22.9 23.2 1 10





Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

QC Batch: PMST/11701 Analysis Method: ASTM D2974-87

QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture

Associated Lab Samples: 40120281033

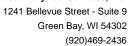
SAMPLE DUPLICATE: 1213131

Date: 09/01/2015 03:24 PM

Percent Moisture

40120281033 Dup Max
Result Result RPD RPD Qualifiers

24.1 23.9 1 10





Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

QC Batch: PMST/11705 Analysis Method: ASTM D2974-87

QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture

Associated Lab Samples: 40120281013, 40120281014, 40120281015, 40120281016, 40120281017, 40120281018, 40120281019,

40120281020, 40120281021, 40120281022, 40120281023, 40120281024, 40120281025, 40120281026, 40120281027, 40120281028, 40120281030, 40120281031, 40120281032

SAMPLE DUPLICATE: 1213480

Date: 09/01/2015 03:24 PM

O 22 20: 2:0/.: 2:		40120281027	Dup		Max	
Parameter	Units	Result	Result	RPD	RPD	Qualifiers
Percent Moisture	%	22.5	23.2	3	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.



QUALIFIERS

Project: 218938.0000 PH6 WPS CLAY & SED

Pace Project No.: 40120281

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.

ANALYTE QUALIFIERS

Date: 09/01/2015 03:24 PM

D3 Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

M0 Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

R1 RPD value was outside control limits.

Email #1: Branch/Location: Company Name: PACE LAB # Project Name: Project Number: **Project Contact:** Sampled By (Sign): Project State: Sampled By (Print): Data Package Options
(billable) mall #2: stephone: Transmit Prelim Rush Results by (complete what you want): Rush Turnaround Time Requested - Prelims EPA Level IV EPA Level III (Please Print Clearly) CLIENT FIELD ID 01-10 WPS CLAN & SED BASIN H-Sodium Bisulfate Solution 218938,000 PHO 8-8-6-36-36 NO STORY 797 SOUNTHAN HORSTON 1-24 -18 ' ≪ NOT needed on On your sample MS/MSD your sample (billable) A = Air B = Biota C = Charcoal O = Oil S = Soil Program: DATE Matrix Codes Relinquished By DW = Drinking Water
GW = Ground Water
SW = Surface Water
WW = Waste Water
WP = Wipe PRESERVATION (CODE)* FILTERED? (YES/NO) A=None MATRIX #Preservation Codes

#Preservation Codes

#Preservation Codes

#Preservation Codes Pace Analytical " CHAIN OF CUSTODY マン2 マ Analyses Requested METALS-BORDN, D ARSENIC, LEAD, SELGNIUM Cakium, Zinc I=Sodium Thiosulfate Date/Time MN: 612-607-1700 WI: 920-469-2436 leceived By: Invoice To Company: Invoice To Address Invoice To Contact: Invoice To Phone: Mail To Company: Mail To Address: Mail To Contact: COMMENTS Quote #: CLIENT Date/Time: LAB COMMENTS (Lab Use Only) teceipt Temp = KQ 4012028 Cooler Custody Sea Sample Receipt pH PACE Project No. OK / Adjusted Profile # 53 of 54

으

UPPER MIDWEST REGION

Sample Condition Upon Receipt

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

/ Pace Analytical						
-pp			Project #	WO# : 4	012028	1
Client Name: / K						· alla
Courier: Theod Ex T UPS T Client T Pace Tracking #: 78/2 3 3 3 9/	Other:					
Custody Seal on Cooler/Box Present: yes ?		intact	_ 「yes	40120281		
Custody Seal on Samples Present: yes y			Fyes no			
Packing Material: Bubble Wrap Bubb		None				
Thermometer Used	_		Blue Dry None	Samples on i	ice, cooling process ha	s begun
Cooler Temperature Uncorr: CO-/Corr:		Bloto	gical Tissue is Froze	/ _		
Temp Blank Present: yes no	a pro			r no □	Person examining	contents:
Temp should be above freezing to 6°C for all sample exce Frozen Biota Samples should be received ≤ 0°C.	ept Biota.		Comments:		Date:	
Chain of Custody Present:	Yes UNo	□n/a	1.	. 0	<u>/) - </u>	1/
Chain of Custody Filled Out:	Yes (MIN)	□n/a	2. NO CA	llect	time	8/28/15
Chain of Custody Relinquished:	ZYes □No	□n/a	3.		·	
Sampler Name & Signature on COC:	Øxes □No	□n/a	4.			
Samples Arrived within Hold Time:	or □No	□n/a	5.			
- VOA Samples frozen upon receipt	□Yes □No		Date/Time:			
Short Hold Time Analysis (<72hr):	□Yes Ş No	□n/a	6. / /			. /
Rush Turn Around Time Requested:	Yes □No	□n/a	7. 9/1/15	TAT		8/28/1
Sufficient Volume:	ØYes □No	□n/a	8.			7
Correct Containers Used:	YYes \(\square\)	□n/a	9.			
-Pace Containers Used:	□Yes ØNo	□n/a				
-Pace IR Containers Used:	□Yes □No	□ N/A				
Containers Intact:	Øxes □No	□n/a	10.			
Filtered volume received for Dissolved tests	□Yes □No	∮ N/A	11.	. 0 . 1	. /	00
Sample Labels match COC:	□Yes XNo	□n/a	12. No Col	lect d	ate on	all
-Includes date/time/ID/Analysis Matrix:		·.	pamples	*		J38-42
All containers needing preservation have been checked. (Non-Compliance noted in 13.)	□Yes □No	N/A	13. THNO3	☐ H2SO4 ☐	NaOH NaOH	+ZnAct
All containers needing preservation are found to be in						
compliance with EPA recommendation. (HNO3, H2SO4 ≤2; NaOH+ZnAct ≥9, NaOH ≥12)	□Yes □No	PATA				
exceptions: VOA, coliform, TOC, TOX, TOH, O&G, WIDROW, Phenolics, OTHER:	□Yes ØÑo			b Std #ID of eservative	Date/ Time:	
Headspace in VOA Vials (>6mm):	□Yes □No	Z N/A				
Trip Blank Present:	□Yes □No					
Trip Blank Custody Seals Present	□Yes □No	_	•			
Pace Trip Blank Lot # (if purchased):						
Client Notification/ Resolution:		_		ecked, see attache	ed form for additional co	mments
Person Contacted: Comments/ Resolution:		Date/1	Time:			
			^			
Project Manager Review:		M	IH for TA	Date:	8/28/10	



(920)469-2436



October 01, 2015

Jonathan Hotstream TRC - Madison 708 Heartland Trail Madison, WI 53717

RE: Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Dear Jonathan Hotstream:

Enclosed are the analytical results for sample(s) received by the laboratory on September 17, 2015. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI 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

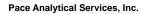
Tod nolteneya

tod.noltemeyer@pacelabs.com

Project Manager

Enclosures





Pace Analytical www.pacelabs.com

1241 Bellevue Street - Suite 9 Green Bay, WI 54302 (920)469-2436

CERTIFICATIONS

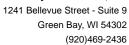
Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302 Florida/NELAP Certification #: E87948 Illinois Certification #: 200050 Kentucky Certification #: 82 Louisiana Certification #: 04168 Minnesota Certification #: 055-999-334 Virginia VELAP ID: 460263

North Dakota Certification #: R-150 South Carolina Certification #: 83006001 Texas Certification #: T104704529-14-1 US Dept of Agriculture #: S-76505 Virginia VELAP ID: 460263 Virginia VELAP Certification ID: 460263 Wisconsin Certification #: 405132750





SAMPLE SUMMARY

Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40121216001	CL-1	Solid	09/16/15 14:30	09/17/15 08:10
40121216002	CL-3	Solid	09/16/15 14:30	09/17/15 08:10
40121216003	CL-5	Solid	09/16/15 14:30	09/17/15 08:10
40121216004	CL-6	Solid	09/16/15 14:30	09/17/15 08:10
40121216005	CL-7	Solid	09/16/15 14:30	09/17/15 08:10
40121216006	CL-11	Solid	09/16/15 14:30	09/17/15 08:10
40121216007	CL-13	Solid	09/16/15 14:30	09/17/15 08:10
40121216008	CL-15	Solid	09/16/15 14:30	09/17/15 08:10

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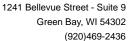
SAMPLE ANALYTE COUNT

Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Lab ID	Sample ID	Method	Analysts	Analytes Reported
40121216001	CL-1	EPA 6010	DLB	5
		ASTM D2974-87	SKW	1
40121216002	CL-3	EPA 6010	DLB	5
		ASTM D2974-87	SKW	1
40121216003	CL-5	EPA 6010	DLB	5
		ASTM D2974-87	SKW	1
40121216004	CL-6	EPA 6010	DLB	5
		ASTM D2974-87	SKW	1
40121216005	CL-7	EPA 6010	DLB	5
		ASTM D2974-87	SKW	1
40121216006	CL-11	EPA 6010	DLB	5
		ASTM D2974-87	SKW	1
40121216007	CL-13	EPA 6010	DLB	5
		ASTM D2974-87	SKW	1
40121216008	CL-15	EPA 6010	DLB	5
		ASTM D2974-87	SKW	1







PROJECT NARRATIVE

Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Method: **EPA 6010** Description: 6010 MET ICP Client: TRC - MADISON Date: October 01, 2015

General Information:

8 samples were analyzed for EPA 6010. 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 3050 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.

Method Blank:

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

QC Batch: MPRP/12655

B: Analyte was detected in the associated method blank.

- BLANK for HBN 205264 [MPRP/126 (Lab ID: 1228464)
 - Lead

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.

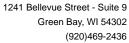
QC Batch: MPRP/12655

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 40121216001

M0: Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

- MS (Lab ID: 1228466)
 - Boron
- MSD (Lab ID: 1228467)
 - Boron

Additional Comments:





PROJECT NARRATIVE

Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Method:EPA 6010Description:6010 MET ICPClient:TRC - MADISONDate:October 01, 2015

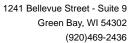
Analyte Comments:

QC Batch: MPRP/12655

D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

- CL-1 (Lab ID: 40121216001)
 - Arsenic
- CL-11 (Lab ID: 40121216006)
 - Arsenic
 - Lead
- CL-13 (Lab ID: 40121216007)
 - Arsenic
 - Lead
- CL-15 (Lab ID: 40121216008)
 - Arsenic
- CL-3 (Lab ID: 40121216002)
 - Arsenic
- CL-5 (Lab ID: 40121216003)
 - Arsenic
 - Lead
- CL-6 (Lab ID: 40121216004)
 - Arsenic
 - Lead
- CL-7 (Lab ID: 40121216005)
 - Arsenic
 - Lead

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





ANALYTICAL RESULTS

Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Date: 10/01/2015 03:57 PM

Sample: CL-1 Lab ID: 40121216001 Collected: 09/16/15 14:30 Received: 09/17/15 08:10 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepara	ation Metho	od: EP	A 3050			
Arsenic	<4.2	mg/kg	13.1	4.2	5	09/28/15 13:21	09/30/15 14:14	7440-38-2	D3
Boron	202	mg/kg	13.1	0.41	1	09/28/15 13:21	09/29/15 20:36	7440-42-8	MO
Calcium	1820	mg/kg	131	3.6	1	09/28/15 13:21	09/29/15 20:36	7440-70-2	
Lead	5.3J	mg/kg	6.6	2.8	5	09/28/15 13:21	09/30/15 14:14	7439-92-1	В
Zinc	33.4	mg/kg	5.2	0.50	1	09/28/15 13:21	09/29/15 20:36	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	24.3	%	0.10	0.10	1		09/18/15 15:50		



ANALYTICAL RESULTS

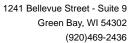
Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Date: 10/01/2015 03:57 PM

Sample: CL-3 Lab ID: 40121216002 Collected: 09/16/15 14:30 Received: 09/17/15 08:10 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	<3.4	mg/kg	10.6	3.4	5	09/28/15 13:21	09/30/15 14:21	7440-38-2	D3
Boron	99.4	mg/kg	10.6	0.33	1	09/28/15 13:21	09/29/15 20:43	7440-42-8	
Calcium	1430	mg/kg	106	2.9	1	09/28/15 13:21	09/29/15 20:43	7440-70-2	
Lead	6.3	mg/kg	5.3	2.3	5	09/28/15 13:21	09/30/15 14:21	7439-92-1	
Zinc	41.9	mg/kg	4.2	0.41	1	09/28/15 13:21	09/29/15 20:43	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	14.9	%	0.10	0.10	1		09/18/15 15:50		





ANALYTICAL RESULTS

Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Date: 10/01/2015 03:57 PM

Sample: CL-5 Lab ID: 40121216003 Collected: 09/16/15 14:30 Received: 09/17/15 08:10 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepar	ation Metho	od: EP	A 3050			
Arsenic	<3.8	mg/kg	11.8	3.8	5	09/28/15 13:21	09/30/15 14:24	7440-38-2	D3
Boron	85.2	mg/kg	11.8	0.37	1	09/28/15 13:21	09/29/15 20:50	7440-42-8	
Calcium	2140	mg/kg	118	3.2	1	09/28/15 13:21	09/29/15 20:50	7440-70-2	
Lead	<2.5	mg/kg	5.9	2.5	5	09/28/15 13:21	09/30/15 14:24	7439-92-1	D3
Zinc	36.7	mg/kg	4.7	0.45	1	09/28/15 13:21	09/29/15 20:50	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	20.9	%	0.10	0.10	1		09/18/15 15:50		



ANALYTICAL RESULTS

Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Date: 10/01/2015 03:57 PM

Sample: CL-6 Lab ID: 40121216004 Collected: 09/16/15 14:30 Received: 09/17/15 08:10 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepara	ation Metho	od: EP	A 3050			
Arsenic	<3.7	mg/kg	11.5	3.7	5	09/28/15 13:21	09/30/15 14:26	7440-38-2	D3
Boron	113	mg/kg	11.5	0.36	1	09/28/15 13:21	09/29/15 20:52	7440-42-8	
Calcium	1350	mg/kg	115	3.1	1	09/28/15 13:21	09/29/15 20:52	7440-70-2	
Lead	3.5J	mg/kg	5.7	2.5	5	09/28/15 13:21	09/30/15 14:26	7439-92-1	B,D3
Zinc	40.1	mg/kg	4.6	0.44	1	09/28/15 13:21	09/29/15 20:52	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	22.2	%	0.10	0.10	1		09/18/15 15:51		



ANALYTICAL RESULTS

Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Date: 10/01/2015 03:57 PM

Sample: CL-7 Lab ID: 40121216005 Collected: 09/16/15 14:30 Received: 09/17/15 08:10 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepara	ation Metho	od: EP	A 3050			
Arsenic	<3.5	mg/kg	11.1	3.5	5	09/28/15 13:21	09/30/15 14:29	7440-38-2	D3
Boron	159	mg/kg	11.1	0.35	1	09/28/15 13:21	09/29/15 20:55	7440-42-8	
Calcium	2040	mg/kg	111	3.0	1	09/28/15 13:21	09/29/15 20:55	7440-70-2	
Lead	2.5J	mg/kg	5.6	2.4	5	09/28/15 13:21	09/30/15 14:29	7439-92-1	B,D3
Zinc	40.4	mg/kg	4.4	0.43	1	09/28/15 13:21	09/29/15 20:55	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	15.2	%	0.10	0.10	1		09/18/15 15:51		



ANALYTICAL RESULTS

Project: 218938 WPS-WESTON 3

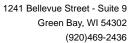
Pace Project No.: 40121216

Date: 10/01/2015 03:57 PM

Sample: CL-11 Lab ID: 40121216006 Collected: 09/16/15 14:30 Received: 09/17/15 08:10 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepara	ation Metho	od: EP	A 3050			
Arsenic	<3.9	mg/kg	12.3	3.9	5	09/28/15 13:21	09/30/15 14:31	7440-38-2	D3
Boron	154	mg/kg	12.3	0.38	1	09/28/15 13:21	09/29/15 20:57	7440-42-8	
Calcium	1570	mg/kg	123	3.4	1	09/28/15 13:21	09/29/15 20:57	7440-70-2	
Lead	3.0J	mg/kg	6.1	2.6	5	09/28/15 13:21	09/30/15 14:31	7439-92-1	B,D3
Zinc	55.3	mg/kg	4.9	0.47	1	09/28/15 13:21	09/29/15 20:57	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	18.9	%	0.10	0.10	1		09/18/15 15:51		





ANALYTICAL RESULTS

Project: 218938 WPS-WESTON 3

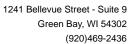
Pace Project No.: 40121216

Date: 10/01/2015 03:57 PM

Sample: CL-13 Lab ID: 40121216007 Collected: 09/16/15 14:30 Received: 09/17/15 08:10 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
6010 MET ICP	Analytical	Method: EPA	6010 Prepara	ation Metho	od: EP	A 3050			
Arsenic	<3.0	mg/kg	9.6	3.0	5	09/28/15 13:21	09/30/15 14:33	7440-38-2	D3
Boron	203	mg/kg	9.6	0.30	1	09/28/15 13:21	09/29/15 20:59	7440-42-8	
Calcium	1930	mg/kg	95.6	2.6	1	09/28/15 13:21	09/29/15 20:59	7440-70-2	
Lead	2.3J	mg/kg	4.8	2.1	5	09/28/15 13:21	09/30/15 14:33	7439-92-1	B,D3
Zinc	64.6	mg/kg	3.8	0.37	1	09/28/15 13:21	09/29/15 20:59	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	11.2	%	0.10	0.10	1		09/18/15 15:51		





ANALYTICAL RESULTS

Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Date: 10/01/2015 03:57 PM

Sample: CL-15 Lab ID: 40121216008 Collected: 09/16/15 14:30 Received: 09/17/15 08:10 Matrix: Solid

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical	Method: EPA	6010 Prepara	ation Metho	od: EP	A 3050			
Arsenic	<3.5	mg/kg	11.0	3.5	5	09/28/15 13:21	09/30/15 14:36	7440-38-2	D3
Boron	111	mg/kg	11.0	0.34	1	09/28/15 13:21	09/29/15 21:02	7440-42-8	
Calcium	1430	mg/kg	110	3.0	1	09/28/15 13:21	09/29/15 21:02	7440-70-2	
Lead	5.6	mg/kg	5.5	2.4	5	09/28/15 13:21	09/30/15 14:36	7439-92-1	
Zinc	38.0	mg/kg	4.4	0.42	1	09/28/15 13:21	09/29/15 21:02	7440-66-6	
Percent Moisture	Analytical	Method: AST	M D2974-87						
Percent Moisture	23.4	%	0.10	0.10	1		09/18/15 15:51		



Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Date: 10/01/2015 03:57 PM

QC Batch: MPRP/12655 Analysis Method: EPA 6010
QC Batch Method: EPA 3050 Analysis Description: 6010 MET

Associated Lab Samples: 40121216001, 40121216002, 40121216003, 40121216004, 40121216005, 40121216006, 40121216007,

40121216008

METHOD BLANK: 1228464 Matrix: Solid

Associated Lab Samples: 40121216001, 40121216002, 40121216003, 40121216004, 40121216005, 40121216006, 40121216007,

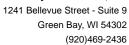
40121216008

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Arsenic	mg/kg	<0.64	2.0	09/29/15 20:32	
Boron	mg/kg	0.57J	10.0	09/29/15 20:32	
Calcium	mg/kg	9.5J	100	09/29/15 20:32	
Lead	mg/kg	0.44J	1.0	09/29/15 20:32	
Zinc	mg/kg	<0.39	4.0	09/29/15 20:32	

LABORATORY CONTROL SAMPLE:	1228465	Spike	LCS	LCS	% Rec	
Parameter	Units	Conc.	Result	% Rec	Limits	Qualifiers
Arsenic	mg/kg	50	48.0	96	80-120	
Boron	mg/kg	50	48.4	97	80-120	
Calcium	mg/kg	500	497	99	80-120	
Lead	mg/kg	50	49.6	99	80-120	
Zinc	mg/kg	50	50.0	100	80-120	

MATRIX SPIKE & MATRIX SP	IKE DUPLICA	TE: 12284	66		1228467							
	40	0121216001	MS Spike	MSD Spike	MS	MSD	MS	MSD	% Rec		Max	
Parameter	Units	Result	Conc.	Conc.	Result	Result	% Rec	% Rec	Limits	RPD	RPD	Qual
Arsenic	mg/kg	<4.2	65.8	65.7	67.2	63.3	102	96	75-125	6	20	
Boron	mg/kg	202	65.8	65.7	370	365	256	249	75-125	1	20	M0
Calcium	mg/kg	1820	658	657	2520	2480	107	102	75-125	2	20	
Lead	mg/kg	5.3J	65.8	65.7	68.6	68.6	96	96	75-125	0	20	
Zinc	mg/kg	33.4	65.8	65.7	97.7	100	98	102	75-125	3	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.





Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

QC Batch: PMST/11800 Analysis Method: ASTM D2974-87

QC Batch Method: ASTM D2974-87 Analysis Description: Dry Weight/Percent Moisture

Associated Lab Samples: 40121216001, 40121216002, 40121216003, 40121216004, 40121216005, 40121216006, 40121216007,

40121216008

SAMPLE DUPLICATE: 1223765

Date: 10/01/2015 03:57 PM

		40121078005	Dup		Max	
Parameter	Units	Result	Result	RPD	RPD	Qualifiers
Percent Moisture	%	22.1	22.0	0	10	

(920)469-2436



QUALIFIERS

Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

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.

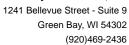
ANALYTE QUALIFIERS

Date: 10/01/2015 03:57 PM

B Analyte was detected in the associated method blank.

D3 Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

M0 Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.





QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: 218938 WPS-WESTON 3

Pace Project No.: 40121216

Date: 10/01/2015 03:57 PM

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40121216001	CL-1	EPA 3050	MPRP/12655	EPA 6010	ICP/11224
40121216002	CL-3	EPA 3050	MPRP/12655	EPA 6010	ICP/11224
40121216003	CL-5	EPA 3050	MPRP/12655	EPA 6010	ICP/11224
40121216004	CL-6	EPA 3050	MPRP/12655	EPA 6010	ICP/11224
40121216005	CL-7	EPA 3050	MPRP/12655	EPA 6010	ICP/11224
40121216006	CL-11	EPA 3050	MPRP/12655	EPA 6010	ICP/11224
40121216007	CL-13	EPA 3050	MPRP/12655	EPA 6010	ICP/11224
40121216008	CL-15	EPA 3050	MPRP/12655	EPA 6010	ICP/11224
40121216001	CL-1	ASTM D2974-87	PMST/11800		
40121216002	CL-3	ASTM D2974-87	PMST/11800		
40121216003	CL-5	ASTM D2974-87	PMST/11800		
40121216004	CL-6	ASTM D2974-87	PMST/11800		
40121216005	CL-7	ASTM D2974-87	PMST/11800		
40121216006	CL-11	ASTM D2974-87	PMST/11800		
40121216007	CL-13	ASTM D2974-87	PMST/11800		
40121216008	CL-15	ASTM D2974-87	PMST/11800		

Sai speci	Fax:	Telephone:	Final #2:	Transmit Prelin		Rush Turn				8	8	38	8	183	283	18	2	PACE LAB #		EPA Level IV	(billable) EPA Level III	Data Package	PO #	Sampled By (Sign):	Sampled By (Print):	Project State:	Project Name:	Project Number:	Phone:	Project Contact:	Branch/Location:	Company Name:
Samples on HOLD are subject to special pricing and release of liability				Transmit Prelim Rush Results by (complete what you want):	Date Needed:	Rush Turnaround Time Requested - Prelims (Rush TAT subject to approval/surcharge)				C) -15	CL-13	CL-11	CL-7	12-6	CT V	(1-3	4	CLIEN! FIELD ID	your sample	NOT needed on	On your sample	MS/MSD		an): 200 20 21	int): 6000l Shea	WHT I	WPS-Weston is	2/8958		Finn Hotsmann	Simon	1
Relinquished By:		Relinquished By:		Relinguished By:	Relindershed By:	Relinquished By:	ſ			K W							116 1750 1	ᅪ	WP = Wipe	SW = Surface Water WW = Waste Water	A = Air W = Water B = Biota DW = Drinking Water C = Charmoni GW = Ground Water	atrix Codes	Regulatory Program:	d	PRESERVATION Pick (CODE)" Letter	. sententiano		A=None B=HCL				- Ange
Date/Time:		Date/Time:		Date/Time:	9-17-15 0810	Date/Tille.													Ar Bo	8 vo	in it	2.	7					C=H2SO4 D=HNO3 E=DI Water F=Methanol	Propertion Codes	_	www.pacelabs.com	PACE ADAINSTCAL®
Received by:		Received By:	,	Received By:	Received By:		Received By:											•		ihu	<u></u>							hanol G=NaOH				
Color Inno.	Date/Time:	Date/Time:		0 '	Date/Time:		Date/Time:												COMMENTS	CHENT	Invoice To Phone:	-	Invoice To Address:	Invoice to Company:	Invoice to Contact:			Mail To Address:	Mail To Company.	Mail To Contact:	Onote #:	
Intact / Not Intact Version 6.0 06/14/06	Present / Not Present	Cooler Custody Seal	OK / Adjusted		080 1	TINO 10 110	PACE Project No.			4		,						1-4020#	\vdash	LAB COMMENTS Profile #												121212 e 19

(Please Print Clearly)

UPPER MIDWEST REGION
MN: 612-607-1700 WI: 920-469-2436

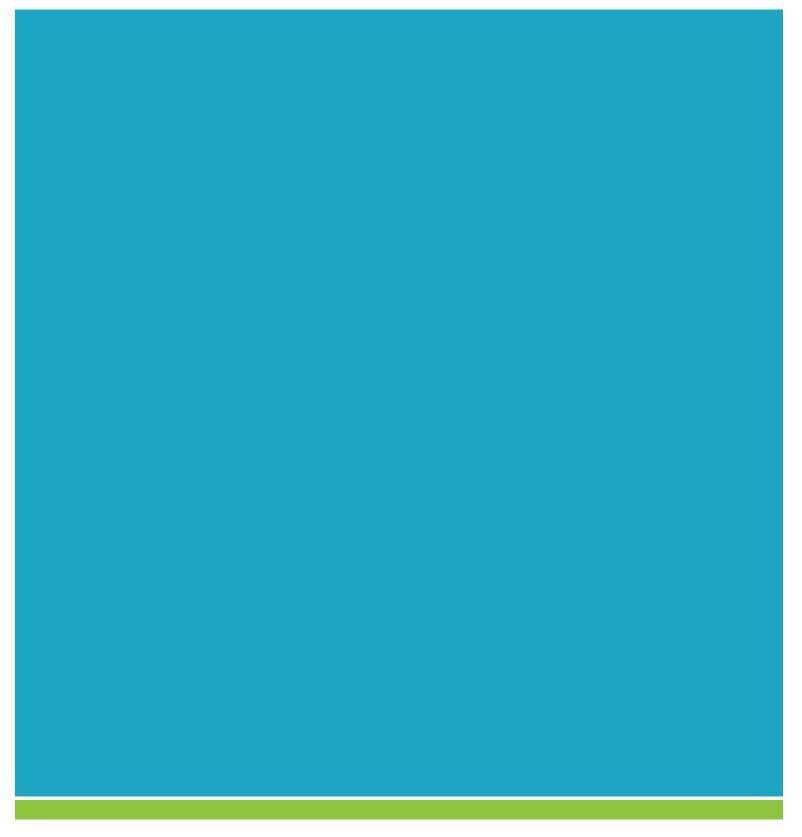
Page 으

e 19 of 20

Sample Condition Upon Receipt

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

lient Name: TRC	- Othor	Project #		10121216 ∭
urier: Fed Ex T UPS T Client T I	Pace Jiner:		40121216	# # #
acking#: <u>/8/3,4444</u> ustody Seal on Cooler/Box Present: Ty	es k no Seals inta	ct: 「yes 「no		
ustody Seal on Samples Present: Tyes	no Seals inta	ct: T yes T no		
acking Material: Bubble Wrap	Bubble Bags 🗀 No	ne Cother		
nermometer Used <u>SR32</u>	Type of Ice We	Blue Dry None	,	on ice, cooling process has begun
Other remperature street	orr: Bio	logical Tissue is F	rozen. r yes	Person examining contents:
emp Blank Present: yes no			,	Date: 9-77-5
emp should be above freezing to 6°C for all samp rozen Biota Samples should be received ≤ 0°C.	le except Biota.	Comments:		Initials:
hain of Custody Present:	Yes DNo DN	I/A 1.		
		I/A 2.		
hain of Custody Filled Out:		I/A 3.		
hain of Custody Relinquished:		1/A 4.		
ampler Name & Signature on COC:	- 3	VA 5.		
samples Arrived within Hold Time:	□Yes □No	Date/Time:		
- VOA Samples frozen upon receipt				
short Hold Time Analysis (<72hr):		N/A 6.		
Rush Turn Around Time Requested:	□Yes ŪNo □I	N/A 7.		
Sufficient Volume:	ØYes □No □	N/A 8.		
Correct Containers Used:	ØYes □No □	N/A 9.		
-Pace Containers Used:	□Yes □ □	N/A		
-Pace IR Containers Used:	□Yes □No 🎝	N/A		
Containers Intact:	Yes No 🗆	N/A 10.		
Filtered volume received for Dissolved tests	□Yes □No □	M/A 11.		
Sample Labels match COC:	□Yes (5)ÎNo □	N/A 12. 120 C	rollect o	late or fine on
-Includes date/time/ID/Analysis Matri		all Dan	ipies.	9-17-5S
All containers needing preservation have been ch	ecked .	(N/A 13. TH	NO3 H2SO4	☐ NaOH ☐ NaOH +ZnAc
(Non-Compliance noted in 13.)		13.		
All containers needing preservation are found to to compliance with EPA recommendation.	□Yes □No 🗗	ĥw/A		
(HNO3, H2SO4 ≤2; NaOH+ZnAct ≥9, NaOH ≥12)		Initial when	Lab Std #ID of	Date/
exceptions: VOA, coliform, TOC, TOX, TOH, O&G, WIDROW, Phenolics, OTHER:	□Yes ZNo	completed	preservative	Time:
Headspace in VOA Vials (>6mm):	□Yes □No □	N/A 14.		
Trip Blank Present:	□Yes □No 万	IN/A 15.		
Trip Blank Custody Seals Present	□Yes □No □	M/A		
Pace Trip Blank Lot # (if purchased):	~			Under the state of
Client Notification/ Resolution:		a-t-/Time:	If checked, see at	ttached form for additional comments
Person Contacted:	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	ate/Time:	OC WN	hunnont. 9-17-15
Comments/ Resolution:	sinal and	Cupy of C		The St



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THERE'S A WAY





