MICHAEL BEST

Michael Best & Friedrich LLP Attorneys at Law One South Pinckney Street Suite 700 Madison, WI 53703 P.O. Box 1806

Madison, WI 53701-1806

Phone 608.257.3501 Fax 608.283.2275

David A. Crass Direct 608.283.2267 Email dacrass@michaelbest.com

August 12, 2016

VIA EMAIL: <u>STEKETEE.JOHN@EPA.GOV</u> & U.S. MAIL

John P. Steketee, Esq. Associate Regional Counsel Office of Regional Counsel U.S. EPA, Region 5 77 W. Jackson Blvd. (C-14J) Chicago, IL 60604-3590

Re: Madison-Kipp Corporation, 201 Waubesa Street, Madison, Wisconsin

Dear Mr. Steketee:

As you know, our Firm represents Madison-Kipp Corporation (MKC) in connection with the above-captioned site. I understand from your voicemail greeting that you are out of the office until August 22, 2016. We write to respond to the August 3, 2016 letter from Margaret M. Guerriero addressed to MKC and the Wisconsin Department of Natural Resources (WDNR).

Coincidentally, the very day we received USEPA's letter, we confirmed a meeting with and among representatives of MKC, WDNR and the State of Wisconsin Department of Justice (DOJ) for September 7, 2016 to continue our negotiations toward settlement of the State's pending enforcement action captioned *State of Wisconsin v. Madison-Kipp Corporation*, Dane County Case 12-CX-46. These settlement negotiations reach back some time as noted in USEPA's letter. However, that is not to say that the matter has been dormant since the parties' meeting in August 2014. Rather, MKC has accomplished much by way of further investigation and remediation at the site generally and specifically with respect to polychlorinated biphenyls (PCBs). We note the following:

- On February 15, 2016, Arcadis, on behalf of MKC, submitted a Supplemental Investigation Summary Report (attached) concerning building interior PCBs and the "Background" section of that report provides a summary of activities undertaken with respect to PCBs subsequent to the August 2014 meeting in Janesville;
- On February 25, 2016, a Groundwater Closure Strategy document was provided by MKC to WDNR to advance discussions;
- On May 6, 2016, follow-up correspondence (attached) was sent seeking agency concurrence on all activities required and completed subsequent to the August 2014 meeting in Janesville.



John P. Steketee, Esq. August 12, 2016 Page 2

Additionally, we provided a markup of a proposed Stipulation and Order for Judgment for negotiation with DOJ on January 14, 2016, and have thereafter repeatedly indicated our readiness to engage in further discussions.

We have consulted with both DOJ and WDNR representatives and what the parties propose is that the parties meet after the September 7, 2016 meeting scheduled among MKC and State representatives and that that meeting would serve to update USEPA on the status of those discussions. Unfortunately, the date USEPA proposed (September 8, 2016) does not work on my schedule. As such, we have shared potential dates with WDNR that we believe to be mutually convenient for the State and MKC and, therefore, offer the following dates for a meeting either in Chicago, Madison or Janesville. Those dates are as follows: September 19, 23 or 29.

Please consider this information and I look forward to hearing from you regarding rescheduling the meeting suggested in the August 3, 2016 USEPA correspondence.

Very truly yours,

MICHAEL BEST & FRIEDRICH LLP

David A. Crass

Enclosures

cc via email w enc.:

Anthony Koblinski, MKC (tkoblinski@madison-kipp.com) Thomas J. Dawson, DOJ (dawsontj@doj.state.wi.us) Patrick Stevens, DNR (patrick.stevens@wisconsin.gov) Darsi Foss, DNR (darsi.foss@wisconsin.gov)

063628-0040\19485654.1



Mike Schmoller Project Manager Wisconsin Department of Natural Resources South Central Region 3911 Fish Hatchery Rd Fitchburg WI 53711

Subject:

Building Interior Polychlorinated Biphenyl (PCB) Supplemental Investigation Summary, Madison-Kipp Corporation, 201 Waubesa Street, Madison, Wisconsin. Facility ID No. 113125320, BRRTS No. 02-13-001569

Dear Mr. Schmoller:

On behalf of Madison-Kipp Corporation (MKC), this letter provides a summary of the supplemental sampling and floor coating activities, analytical results, and recommendations for PCBs within the manufacturing portion of the MKC facility located at 201 Waubesa Street, Madison, Wisconsin (Site).

A Natural Resources 712.09 submittal certification is included in Attachment A.

BACKGROUND

A Supplemental Building Interior Polychlorinated Biphenyl Work Plan Subsurface Investigation Summary was submitted to the Wisconsin Department of Natural Resources (WDNR) and United States Environmental Protection Agency (U.S. EPA) on April 22, 2014, to provide details of the investigation activities completed within the MKC building from December 2013 through February 2014. On August 27, 2014, ARCADIS met with the WDNR and U.S. EPA to discuss the next steps for addressing the soils containing PCBs beneath the building. At this meeting, U.S. EPA requested the completion of indoor air and surface wipe sampling activities, a technical justification submittal for management of PCB contaminated soils beneath the building, and additional soil investigation activities for beneath the building.

On October 22, 2014, a Technical Justification – Polychlorinated Biphenyl (PCB)-Impacted Soils Beneath the Main Manufacturing Building (Technical Justification) Arcadis U.S., Inc. 126 North Jefferson Street Suite 400 Milwaukee Wisconsin 53202 Tel 414 276 7742 Fax 414 276 7603 www.arcadis.com

ENVIRONMENT

Date: February 15, 2016

Contact: Jennine Trask

Phone: 414.277.6203

^{Email:} Jennine.trask @arcadis.com

Our ref: WI001368.0029 Mike Schmoller February 15, 2016

was submitted to the WDNR. The Technical Justification included the *Supplemental Work Plan for Polychlorinated Biphenyl Building Subsurface Investigation* (Subsurface Work Plan) as an attachment. On November 4, 2014, a *Work Plan for Polychlorinated Biphenyl Building Wipe Sampling* (Wipe Sampling Work Plan) was submitted to the WDNR and U.S. EPA for approval. The WDNR approved the Wipe Sampling Work Plan in electronic correspondence dated December 8, 2014.

On December 17, 2014, MKC met with the WDNR and U.S. EPA (via telephone) to discuss the Technical Justification, Subsurface Work Plan, and Wipe Sampling Work Plan submittals. During this meeting, U.S. EPA requested continuous soil sampling during the additional soil investigation, PCB homolog analysis for select soil sample locations, and installation and sampling of one monitoring well within the building as part of the Subsurface Work Plan. In addition, U.S. EPA requested preparation and submittal of a Quality Assurance Project Plan (QAPP) for the Wipe Sampling Work Plan. On December 18, 2014, ARCADIS, WDNR, and U.S. EPA participated in a conference call to discuss the proposed QAPP requirements.

Based on the December 17 and 18, 2014, communications, the Subsurface Work Plan was revised and submitted to the WDNR and U.S. EPA on January 22, 2015, and the *Quality Assurance Project Plan Building Interior Polychlorinated Biphenyl Wipe Sampling* (Wipe Sampling QAPP) was submitted to the WDNR and U.S. EPA on February 19, 2015. The Subsurface Work Plan was approved by WDNR in electronic correspondence dated January 23, 2015. The Wipe Sampling QAPP was approved by U.S. EPA in electronic correspondence dated February 25, 2015.

On April 21, 2015, a *Building Interior Polychlorinated Biphenyl Investigation Summary* (April 2015 Summary Report) was submitted to the WDNR to provide details of the investigations completed in March and April 2015. On April 23, 2015, MKC and ARCADIS met with the WDNR at the MKC facility and U.S. EPA (via telephone) to discuss the April 2015 Summary Report. During this meeting, U.S. EPA recommended additional wipe and indoor air sampling activities.

On June 10, 2015, MKC and ARCADIS met with the WDNR and U.S. EPA (via telephone) to discuss additional wipe and indoor air sampling activities recommended during the April 23, 2015, meeting. On June 16, 2015, a Work Plan-Building Interior Polychlorinated Biphenyl Supplemental Sampling (Supplemental Work Plan) was submitted to the WDNR and U.S. EPA for approval. The Supplemental Work Plan was approved by U.S. EPA via telephone on July 15, 2015.

On October 12, 2015, a *Building Interior Polychlorinated Biphenyl Investigation Summary* (October 2015 Summary Report) was submitted to the WDNR to provide details of the floor cleaning and coating activities, PCB awareness program, wipe sampling activities completed in July 2015, and summer indoor air sampling activities completed in August 2015.

This letter documents the subsequent activities completed through January 2016 in accordance with the Supplemental Work Plan.

Mike Schmoller February 15, 2016

INDOOR AIR SAMPLING

Per the request of U.S. EPA and in accordance with the approved Supplemental Work Plan, an additional indoor air sampling event was conducted by MKC within the manufacturing building. Three indoor air samples were collected from the same three locations identified during the April and August 2015 sampling activities. The winter sampling event was conducted on January 12, 2016, when outdoor temperatures were less than 10 degrees Fahrenheit. It should be noted that the outdoor temperatures were between 1 and 7 degrees Fahrenheit. The indoor air sample locations are presented on Figure 1.

The three indoor air samples were collected for analysis of PCB Aroclors by EPA Method TO-10A. The indoor air samples were collected over an eight hour timeframe with low-volume air samplers and polyurethane foam sorbent cartridges.

After collection, the indoor air samples were packaged, placed in a cooler with ice, and submitted to Pace Analytical Services, Inc. in Schenectady, New York for PCB Aroclor analysis by Method TO-10A. The cooler submittal also included laboratory-provided trip blank and field spike samples. The field spike sample was prepared by the laboratory with 1 microgram of Aroclor 1242 and included in a separate, sealed cooler with the original shipment of sampling media. The field spike sample remained packaged and in the separate cooler during the sampling event. The field spike was analyzed by the laboratory to determine if the specific Aroclor that was used for spiking was adequately recovered.

FLOOR COATING ACTIVITIES

The final floor coating activity was completed in select areas of the Grid 4 (Figure 1) area during the week of November 23, 2015. The activity was conducted in accordance with the U.S. EPA-approved method of using a urethane fortified cementitious coating. The select floor area was power-washed and scarified as necessary prior to applying the coating. One coat was applied via hand-trowels and is ¼-inch in thickness. MKC personnel will inspect the floor coating on a monthly basis to verify coating is intact and in good condition.

EVALUATION OF RESULTS AND RECOMMENDATIONS

The following sections present a summary of the regulatory criteria, analytical results, and recommendations.

Regulatory Criteria

The analytical results of the indoor air samples were compared to the U.S. EPA Site-specific calculated standard of 0.21 microgram per cubic meter for an industrial/commercial setting. The Site-specific calculated standard is based on the potential cancer risk for an adult worker. This criteria is summarized in Table 1.

Mike Schmoller February 15, 2016

Indoor Air Analytical Results

The results of the indoor air samples collected on January 12, 2016, were below the criteria in all three samples. A summary of the indoor air analytical results is presented in Table 1 and the laboratory report is provided in Attachment B.

Recommendations

All activities associated with the Supplemental Work Plan have been completed and satisfy the WDNR and U.S. EPA requirements. We request concurrence that no further actions are required related to the Supplemental Work Plan and PCBs in the interior of the MKC facility.

CLOSING

If you have any questions regarding this letter, please contact us at (414) 276-7742.

Sincerely, Arcadis U.S., Inc.

Trenna Sullein

Trenna Seilheimer Senior Scientist

huttokahl.

Christopher D. Kubacki, PE Senior Engineer

- Drash

Jennine L. Trask, PE Project Manager

Electronic Copies: David Crass – Michael Best Tony Koblinski – Madison-Kipp Alina Satkoski – Madison-Kipp Kenneth Zolnierczyk – U.S. EPA

Enclosures:

Table

1 Summary of Interior Building Indoor Air Analytical Results

Figure

1 Indoor Air Sampling Locations and Approximate Floor Coating Footprint

Attachments

- A Submittal Certification
- B Laboratory Report





Table 1

Summary of Interior Building Indoor Air Analytical Results Building Interior Polychlorinated Biphenyl Supplemental Investigation Summary 201 Waubesa Street Madison-Kipp Corporation Madison, Wisconsin Grid I.D. U.S. EPA Grid 3 Grid 1 Grid 7 Sample LD MKC AID04 MKC AIDO MIKC AIDOS

oumpro no.	one-opeome		MILLO-ALILOE			
Sample Date	Value	1/12/2016	1/12/2016	1/12/2016		
PCBs				Contraction of the local division of the loc		
Aroclor 1016		<0.0417	<0.0417	<0.0417		
Aroclor 1221		<0.0417	< 0.0417	< 0.0417		
Aroclor 1232		<0.0417	<0.0417	< 0.0417		
Aroclor 1242		0.139	<0.0417	< 0.0417		
Aroclor 1248		<0.0417	<0.0417	< 0.0417		
Aroclor 1254		< 0.0417	< 0.0417	< 0.0417		
Aroclor 1260		<0.0417	<0.0417	< 0.0417		
Total Aroclor PCBs	0.21	0.139	ND	ND		

General Note:

Constituent concentrations are reported as microgram per cubic meter (µg/m³).

Acronyms and Abbreviations:

- < = Constituent not detected above noted laboratory detection limit
- "--" = Criteria not established
- ND = Constituent not detected above noted laboratory detection limit of individual analytes
- PCB = Polychlorinated biphenyl
- U.S. EPA United States Environmental Protection Agency

Figure



ATTACHMENT A

Submittal Certification



Submittal Certification

This attachment was prepared to satisfy the requirements of Wisconsin Administrative Code Chapter NR 712.09 and is applicable to the following document.

Building Interior Polychlorinated Biphenyl (PCB) Supplemental Investigation Summary Madison-Kipp Corporation 201 Waubesa Street Madison, Wisconsin

I, _____Jennine Trask______, hereby certify that I am a registered professional engineer in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

CPM #34959 Signature, title and P.E. number



I, _______, hereby certify that I am a scientist as that term is defined in s. NR 712.03
 (3), Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

Signature and title

Date

ATTACHMENT B

Laboratory Reports

Date Issued: January 27, 2016



Pace Analytical e-Report

Report prepared for: ARCADIS 126 N. JEFFERSON ST #400 MILWAUKEE, WI 53202 CONTACT: JENNINE TRASK

Project ID: WI001368.0028.00001 MADISON KIPP Sampling Date(s): January 12, 2016 Lab Report ID: 16010182 Client Service Contact: Chelsea Farmer (518) 346-4592 ext. 3843

Analysis Included: PCB Analysis (TO-10A)

Test results meet all National Environmental Laboratory Accreditation Conference (NELAC) requirements unless noted in the case narrative. The results contained within this document relate only to the samples included in this report. Pace Analytical is responsible only for the certified testing and is not directly responsible for the integrity of the sample before laboratory receipt. This report shall not be reproduced, except in full, without the written consent of Pace Analytical Services, Inc.

Koy Smo

Roy Smith Technical Director



Certifications: New York (EPA: NY00906, ELAP: 11078), New Jersey (NY026), Connecticut (PH-0337), Massachusetts (M-NY906), Virginia (1884)

> Pace Analytical Services, Inc. 2190 Technology Drive | Schenectady, NY 12308 Phone: 518.346.4592 | internet: www.pacelabs.com

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CASE NARRATIVE

January 27, 2016

CASE NARRATIVE

This data package (SDG ID: 16010182) consists of 5 polyurethane foam samples received on 01/13/2016. The samples are from Project Name: WI001368.0028.00001 MADISON KIPP.

This sample delivery group consists of the following samples:

5:26
5:35
5:46

Sample Delivery and Receipt Conditions

(1.) All samples were delivered to the laboratory via UPS delivery service on 01/13/2016.

(2.) All samples were received at the laboratory intact and within holding times.

(3.) All samples were received at the laboratory properly preserved, if applicable.

PCB Aroclor Analysis

Analysis for PCB Aroclors was performed by EPA Method TO-10A with Dual GC Column Analysis. Samples were extracted by Method TO-10A. The following technical and administrative items were noted for the analysis:

(1.) All quality assurance parameters were met for this analysis, unless otherwise noted.

Respectfully submitted,

Chelsea L. Farmer Project Manager

S:\Lims Data\1601\16010182\Package\CN_16010182_Rev00.doc

QUALIFIERS

Definitions

B - Denotes analyte observed in associated method blank or extraction blank. Analyte concentration should be considered as estimated.

D - Surrogate was diluted. The analysis of the sample required a dilution such that the surrogate concentration was diluted outside the laboratory acceptance criteria.

E - Denotes analyte concentration exceeded calibration range of instrument. Sample could not be reanalyzed at secondary dilution due to insufficient sample amount, quick turn-around request, sample matrix interference or hold time excursion. Concentration result should be considered as estimated.

J - Denotes an estimated concentration. The concentration result is greater than or equal to the Method Detection Limit (MDL) but less than the Practical Quantitation Limit (PQL).

MDL – Adjusted Method Detection Limit.

P - Indicates relative percent difference (RPD) between primary and secondary gas chromatograph (GC) column analysis exceeds 40 % or indicates percent difference (PD) between primary and secondary gas chromatograph (GC) column analysis exceeds 25 %.

PQL - Practical Quantitation Limit. PQLs are adjusted for sample weight/volume and dilution factors.

RL - Reporting Limit Denotes lowest analyte concentration reportable for the sample based on regulatory or project specific limits.

U - Denotes analyte not detected at concentration greater than the Practical Quantitation Limit (PQL) or the Reporting Limit (RL) or the Method Detection Limit (MDL) as applicable.

Z - Chromatographic interference due to polychlorinated biphenyl (PCB) co-elution.

* - Value not within control limits.

SAMPLE CHAIN OF CUSTODY

Pace Analytical Services, Inc.

0	Pace Analytical" www.pacetabs.com
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CHAIN-OF-CUSTODY / Analytical <16010182P1 >)ent The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fie

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Www.pacetabs.com	Section A Section: Required Client Information:	Company: APCADIS Report	March Jefferson of #400 Com	Milwauker w 53202.	TENNING TRUCK O LIVERON LAM PURCH	1414 276 7742 Fill 4 - 276 7603 Project	Requested Due Date/TAT: 510.000 r.C. Projec		Section D Matrix Codes Required Client Information MATRIX / CODE	Matter Waster P Product P Pro		I MIKO	2 MUL- #K07	3 MUC-MK4:3	4 IT IP BIANT	5 Meld wite	0 L		10	11 12	ADDITIONAL COMMENTS	Each Put had zulou G	of air pumped through N	>

F-ALL-Q-020rev.07,150, May 2007 Page 9 of 25

seint seiqme2 (N/Y)

Custody Sealed Cooler (Y/N)

Received on Ice (Y/V)

O° ni qmaT

DATE Signed (MM/DD/YY):

PRINT NAME OF SAMPLER: ALING SAFFOSK

SAMPLER NAME AND SIGNATURE

ORIGINAL

SIGNATURE OF SAMPLER: (LUNDOR HOUL)

*Important Note: By signing this form you are accepting Pace's NET 30 day payment terms and agreeing to late charges of 1.5% per month for any involves not paid within 30 days. Pace Analytical Services, Inc.

Sample Condition Upon Receipt	CLIENT NAME: ARC-WIT PROJECT: 400 W1001368.0008.00001	5 7 3/0 49 4 1 0 0 0 N/A 0 0 0 N/A 0 0 0 N/A 0	に is rrucial: Tes U NO D N/A あ Temperature is Acceptable? Nyes The	Present: See ONe 1.	Filled Out: Dres Drug 2."Trip blank" and "Field Sonke missing matrix same le trop.	Relinquished: Stres DNo 3. alloction date and reguested analyses.	olgnature on COC: Xyes DNo 4. ' ' ' ' '	wurin Hold Time: Strees Dive 5. Malvsis (<22hr): Dive Street 6	Time Requested:	Elves DNo 8.	s Used: Kyes DNo 9.	ners Used: Xves DNo	Coves DNo 10.	ceived for Dissolved tests: Dres DNo DNA 11.	tch COC: Eres DNo 12. N° (NFCGMasticn and labol fice Sample) e/time/ID/Analysis Trip Blank and Sield Caiko	ling preservation have been \Box ves \Box No ŽNIA 13. checked:	eding preservation are in Uves UNo Advia	not checked: TOC, VOA, Subcontract Analyses	Vials (>6mm): Dyes DNo 14. 14.	Dyes DNo 2012.	Seals Present: Dres DNo Éfina :#:/ []	n filled in: <u>YAC 1/13/IL</u> Line-Out (Includes Copying Shipping Documents and verifying sample pH): <u>アトレ 1/13/IC</u> Log In (Includes notifying PM of any discrepacies and documenting in LIMS): <u>アホレ 1/13/IC</u> Labeling (Includes Scanning Bottles and entering LAB IDs into pH logbook): <u>アホレ 1/13/IC</u>
	COURIER: FedEx D	TRACKING # <u>신 15 7</u> 3() 4 ⁷ PACKING MATERIAL: Bubble Wra THERMOMETER USED: #164형	COMMENTS:	Chain of Custody Present:	Chain of Custody Filled Out:	Chain of Custody Relinquished:	Sampler Name / Signature on CC	Short Hold Time Analysis (<72hr)	Rush Turn Around Time Request	Sufficient Volume:	Correct Containers Used:	- Pace Containers Used:	Containers Intact:	Filtered volume received for Diss	Sample Labels match COC: - Includes date/time/ID/Ana	All containers needing preservation f checked:	All containers needing preservatio compliance with EPA recommend	- Exceptions that are not checked: TOC, v	Headspace in VOA Vials (>6mm):	Trip Blank Present:	Trip Blank Custody Seals Present: Pace Trip Blank Lot #: $$	Sample Receipt form filled in: KAC

Document Control# F-NY-C-034-rev.00 (15July2015)

Pace Analytical Services, Inc.

16010182 - Page 10 of 25

January 27, 2016

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<16010182P2>

SAMPLE RECEIPT

16010182 - Page 11 of 25



SAMPLE RECEIPT REPORT 16010182

Pace Analytical Services, Inc. 2190 Technology Drive Schenectady, NY 12308 Phone: 518.346.4592 Fax: 518.381.6055

CLIENT: ARCADIS PROJECT: WI001368.0028.00001 MADISON KIPP LRF: 16010182 REPORT: ANALYTICAL REPORT EDD: YES LRF TAT: 2 WEEK

 Received date: 01/13/2016 10:20
 SAMPLE SEALS INTACT: NA

 Shipped via: Ups
 1.3AMPLES PRESERVED PER METHOD GUIDANCE: YES

 Shipping id: J4543104494
 3 SAMPLES REC'D IN HOLDTIME: YES

 NUMBER OF COOLERS: 1
 DISPOSAL: BY LAB (45 DAYS)

 CUSTODY SEAL INTACT: YES
 COC DISCREPANCY: YES

 COOLER STATUS: CHILLED
 5.0 °C

COMMENTS:

TRIP BLANK AND FIELD SPIKE MISSING MATRIX, SAMPLE TYPE, COLLECTION DATE AND REQUESTED ANALYSES.

NO INFORMATION ON CLIENT LABEL FOR SAMPLE "TRIP BLANK" AND "FIELD SPIKE".

CLIENT ID (LAB ID)	TAT-DUE Date ⁴	DATE-TIME SAMPLED	MATRIX	METHOD	TEST DESCRIPTION	QC REQUEST
MKC-AIR01 (AT00531)	2 WEEK 01-27-16	01/12/2016 15:26	PF10	EPA TO-10A	PCB Analysis (TO-10A)	
MKC-AIR02 (AT00532)	2 WEEK 01-27-16	01/12/2016 15:35	PF10	EPA TO-10A	PCB Analysis (TO-10A)	
MKC-AIR03 (AT00533)	2 WEEK 01-27-16	01/12/2016 15:46	PF10	EPA TO-10A	PCB Analysis (TO-10A)	
TRIP BLANK (AT00534)	2 WEEK 01-27-16	01/12/2016	PF10	EPA TO-10A	PCB Analysis (TO-10A)	
FIELD SPIKE (AT00535)	2 WEEK 01-27-16	01/12/2016	PF10	EPA TO-10A	PCB Analysis (TO-10A)	

¹The pH preservation check of Oil and Grease (Method 1664) and Total Organic Carbon (Method 5310B) are performed as soon as possible after sample receipt and may not be included in this report.

² The pH preservation check of aqueous volatile samples is not performed until after the analysis of the sample to maintain zero headspace and is not included in this report. ³ Samples received for pH analysis are not marked as a hold time exceedance here. SW-846 methods suggests analysis to be done within 15 minutes of sample collection. Because of transportation time it

4 is not possible for the laboratory to perform the test in that time. Sample Certificates of Analysis reports are noted as such.

Samples arriving at the laboratory after 4:00 pm are assigned a due date as if they arrived the following business day unless other arrangements have been made.

The due date represents the date the lab report is expected to be completed on or before 5:00 pm (EST) for the date specified.

⁵All samples which require thermal preservation shall be considered acceptable when received greater than 6 degrees Celsius if they are collected on the same day as received and there is evidence that the chilling process has begun, such as arrival on ice. Control limits are between 0-6 Degrees Celsius. Control limits do not apply for metals analysis.

⁶Samples requesting analysis for Orthophosphate (SM 4500-P E-99,-11) require the samples to be filtered in the field within 15 minutes of the sampling event. Samples that are received unfiltered will be noted as not method compliant on the Certificates of Analysis.

Reporting Parameters and Lists

EPA TO-10A - PCB Analysis (TO-10A) - (ug)

Aroclor 1016 Aroclor 1221 Aroclor 1232 Aroclor 1242 Aroclor 1248 Aroclor 1254 Aroclor 1254 Aroclor 1260 Total PCB Amount > RL EPA TO-10A - PCB Analysis (TO-10A) - (ug/m3)

Aroclor 1016 Aroclor 1221 Aroclor 1232 Aroclor 1242 Aroclor 1248 Aroclor 1254 Aroclor 1254 Aroclor 1260 Total PCB Amount > RL

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Page 1 of 1

2190 Technology Drive Schenectady, NY 12308 Phone 518.346.4592 Fax 518.381.6055

GC - PCB



Job Number: 16010182

Pace Analytical Services, Inc. 2190 Technology Drive Schenectady, NY 12308 Phone: 518.346.4592 Fax: 518.381.6055

Client: ARCADIS Project: WI001368.0028.00001 MADISON KIPP Client Sample ID: MKC-AIR01 Lab Sample ID: 16010182-01 (AT00531)

Collection Date: 01/12/2016 15:26 Sample Matrix: POLYURETHANE FOAM Received Date: 01/13/2016 10:20 Percent Solid: N/A

Batch	ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1: GC10B-1	1617-23	EPA Method TO-10A	01/15/2016 16:36	JKA	NA	NA	Phenomenex, Zebron ZB-5, 20 m, 0.18 mm ID, 0.18 μm
Prep 1: 33249		TO-10A	01/14/2016 15:30	MH	2.40m ³	5.00 mL	NA
Analyte		CAS No.	Result (ug/m ³)	PQL	Dilution Fact	or Flags	File ID
Aroclor 1016		12674-11-2	ND	0.0417	1.00	U	GC10B-1617-23
Aroclor 1221		11104-28-2	ND	0.0417	1.00	U	GC10B-1617-23
Aroclor 1232		11141-16-5	ND	0.0417	1.00	U	GC10B-1617-23
Aroclor 1242		53469-21-9	0.139	0.0417	1.00		GC10B-1617-23
Aroclor 1248		12672-29-6	ND	0.0417	1.00	U	GC10B-1617-23
Aroclor 1254		11097-69-1	ND	0.0417	1.00	U	GC10B-1617-23
Aroclor 1260		11096-82-5	ND	0.0417	1.00	U	GC10B-1617-23
Total PCB Amount >	RL	1336-36-3	0.139		1.00		GC10B-1617-23
				Lin	nits		
Surrogate		CAS No.	% Recovery	(%	6)	\mathbf{Q}^{1}	File ID
Tetrachloro-meta-xyle	ene	877-09-8	91.5	60.0	-120		GC10F-1631-23
Decachlorobiphenyl		2051-24-3	109	60.0	-120		GC10F-1631-23
Tetrachloro-meta-xyle	ene	877-09-8	98.0	60.0	-120		GC10B-1617-23
Decachlorobiphenyl		2051-24-3	114	60.0	-120		GC10B-1617-23

¹Qualifier column where '*' denotes value outside the control limits or 'D' denotes value was diluted.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.

Note: Concentration results based upon client supplied air volumes.



Job Number: 16010182

Pace Analytical Services, Inc. 2190 Technology Drive Schenectady, NY 12308 Phone: 518.346.4592 Fax: 518.381.6055

Client: ARCADIS Project: W1001368.0028.00001 MADISON KIPP Client Sample ID: MKC-AIR02 Lab Sample ID: 16010182-02 (AT00532)

Collection Date: 01/12/2016 15:35 Sample Matrix: POLYURETHANE FOAM Received Date: 01/13/2016 10:20 Percent Solid: N/A

Ba	atch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1: GC	10F-1631-24	EPA Method TO-10A	01/15/2016 16:48	JKA	NA	NA	Phenomenex, Zebron ZB-1MS, 20 m, 0.18 mm ID, 0.18 µm
Prep 1: 332	249	TO-10A	01/14/2016 15:30	MH	2.40m ³	5.00 mL	NA
Analyte		CAS No.	Result (ug/m ³)	PQL	Dilution Fact	or Flags	File ID
Aroclor 1016		12674-11-2	ND	0.0417	1.00	U	GC10F-1631-24
Aroclor 1221		11104-28-2	ND	0.0417	1.00	U	GC10F-1631-24
Aroclor 1232		11141-16-5	ND	0.0417	1.00	U	GC10F-1631-24
Aroclor 1242		53469-21-9	ND	0.0417	1.00	U	GC10F-1631-24
Aroclor 1248		12672-29-6	ND	0.0417	1.00	\mathbf{U}	GC10F-1631-24
Aroclor 1254		11097-69-1	ND	0.0417	1.00	U	GC10F-1631-24
Aroclor 1260		11096-82-5	ND	0.0417	1.00	U	GC10F-1631-24
Total PCB Amour	nt > RL	1336-36-3	ND		1.00	U	GC10F-1631-24
				Lin	nits		
Surrogate		CAS No.	% Recovery	(%	()	\mathbf{Q}^{1}	File ID
Tetrachloro-meta-	xylene	877-09-8	90.0	60.0	-120		GC10F-1631-24
Decachlorobiphen	nyl	2051-24-3	102	60.0	-120		GC10F-1631-24
Tetrachloro-meta-	xylene	877-09-8	94.7	60.0	-120		GC10B-1617-24
Decachlorobiphen	nyl	2051-24-3	115	60.0	-120		GC10B-1617-24

Qualifier column where '*' denotes value outside the control limits or 'D' denotes value was diluted.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.

Note: Concentration results based upon client supplied air volumes.



Job Number: 16010182

Pace Analytical Services, Inc. 2190 Technology Drive Schenectady, NY 12308 Phone: 518.346.4592 Fax: 518.381.6055

Client: ARCADIS Project: WI001368.0028.00001 MADISON KIPP Client Sample ID: MKC-AIR03 Lab Sample ID: 16010182-03 (AT00533)

Collection Date: 01/12/2016 15:46 Sample Matrix: POLYURETHANE FOAM Received Date: 01/13/2016 10:20 Percent Solid: N/A

Ba	atch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1: GC	C10F-1631-25	EPA Method TO-10A	01/15/2016 17:01	JKA	NA	NA	Phenomenex, Zebron ZB-1MS, 20 m, 0.18 mm ID, 0.18 µm
Prep 1: 332	249	TO-10A	01/14/2016 15:30	MH	2.40m ³	5.00 mL	NA
Analyte		CAS No.	Result (ug/m ³)	PQL	Dilution Facto	or Flags	File ID
Aroclor 1016		12674-11-2	ND	0.0417	1.00	U	GC10F-1631-25
Aroclor 1221		11104-28-2	ND	0.0417	1.00	U	GC10F-1631-25
Aroclor 1232		11141-16-5	ND	0.0417	1.00	U	GC10F-1631-25
Aroclor 1242		53469-21-9	ND	0.0417	1.00	U	GC10F-1631-25
Aroclor 1248		12672-29-6	ND	0.0417	1.00	U	GC10F-1631-25
Aroclor 1254		11097-69-1	ND	0.0417	1.00	U	GC10F-1631-25
Aroclor 1260		11096-82-5	ND	0.0417	1.00	U	GC10F-1631-25
Total PCB Amou	nt > RL	1336-36-3	ND		1.00	U	GC10F-1631-25
				Lin	nits		
Surrogate		CAS No.	% Recovery	(%	()	\mathbf{Q}^{1}	File ID
Tetrachloro-meta-	-xylene	877-09-8	82.6	60.0	-120		GC10F-1631-25
Decachlorobipher	nyl	2051-24-3	101	60.0	-120		GC10F-1631-25
Tetrachloro-meta-	-xylene	877-09-8	87.4	60.0	-120		GC10B-1617-25
Decachlorobipher	nyl	2051-24-3	111	60.0	-120		GC10B-1617-25

¹Qualifier column where '*' denotes value outside the control limits or 'D' denotes value was diluted.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.

Note: Concentration results based upon client supplied air volumes.



Job Number: 16010182

Pace Analytical Services, Inc. 2190 Technology Drive Schenectady, NY 12308 Phone: 518.346.4592 Fax: 518.381.6055

Client: ARCADIS Project: WI001368.0028.00001 MADISON KIPP Client Sample ID: TRIP BLANK Lab Sample ID: 16010182-04 (AT00534)

Collection Date: 01/12/2016 Sample Matrix: POLYURETHANE FOAM Received Date: 01/13/2016 10:20 Percent Solid: N/A

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	GC10F-1631-26	EPA Method TO-10A	01/15/2016 17:13	JKA	NA	NA	Phenomenex, Zebron ZB-1MS, 20 m, 0.18 mm ID, 0.18 µm
Prep 1:	33249	TO-10A	01/14/2016 15:30	MH	0.00m ³	5.00 mL	NA
Analyte		CAS No.	Result (ug)	PQL	Dilution Facto	or Flags	File ID
Aroclor 1016		12674-11-2	ND	0.100	1.00	U	GC10F-1631-26
Aroclor 1221		11104-28-2	ND	0.100	1.00	U	GC10F-1631-26
Aroclor 1232		11141-16-5	ND	0.100	1.00	U	GC10F-1631-26
Aroclor 1242		53469-21-9	ND	0.100	1.00	U	GC10F-1631-26
Aroclor 1248		12672-29-6	ND	0.100	1.00	U	GC10F-1631-26
Aroclor 1254		11097-69-1	ND	0.100	1.00	U	GC10F-1631-26
Aroclor 1260		11096-82-5	ND	0.100	1.00	U	GC10F-1631-26
Total PCB Amo	ount > RL	1336-36-3	ND		1.00	U	GC10F-1631-26
				Lin	nits		
Surrogate		CAS No.	% Recovery	(%	(a)	\mathbf{Q}^1	File ID
Tetrachloro-me	ta-xylene	877-09-8	92.3	60.0	-120		GC10F-1631-26
Decachlorobiph	nenyl	2051-24-3	108	60.0	-120		GC10F-1631-26
Tetrachloro-me	ta-xylene	877-09-8	89.7	60.0	-120		GC10B-1617-26
Decachlorobiph	nenyl	2051-24-3	113	60.0	-120		GC10B-1617-26

¹Qualifier column where '*' denotes value outside the control limits or 'D' denotes value was diluted.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Job Number: 16010182

Pace Analytical Services, Inc. 2190 Technology Drive Schenectady, NY 12308 Phone: 518.346.4592 Fax: 518.381.6055

Client: ARCADIS Project: W1001368.0028.00001 MADISON KIPP Client Sample ID: FIELD SPIKE Lab Sample ID: 16010182-05 (AT00535)

Collection Date: 01/12/2016 Sample Matrix: POLYURETHANE FOAM Received Date: 01/13/2016 10:20 Percent Solid: N/A

Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1: GC10B-1617-	27 EPA Method TO-10A	01/15/2016 17:26	JKA	NA	NA .	Phenomenex, Zebron ZB-5, 20 m, 0.18 mm ID, 0.18 µm
Prep 1: 33249	TO-10A	01/14/2016 15:30	MH	0.00m ³	5.00 mL	NA
Analyte	CAS No.	Result (ug)	PQL	Dilution Fact	or Flags	File ID
Aroclor 1016	12674-11-2	ND	0.100	1.00	U	GC10B-1617-27
Aroclor 1221	11104-28-2	ND	0.100	1.00	\mathbf{U}	GC10B-1617-27
Aroclor 1232	11141-16-5	ND	0.100	1.00	\mathbf{U}	GC10B-1617-27
Aroclor 1242	53469-21-9	0.993	0.100	1.00		GC10B-1617-27
Aroclor 1248	12672-29-6	ND	0.100	1.00	U	GC10B-1617-27
Aroclor 1254	11097-69-1	ND	0.100	1.00	U	GC10B-1617-27
Aroclor 1260	11096-82-5	ND	0.100	1.00	U	GC10B-1617-27
Total PCB Amount > RL	1336-36-3	0.993		1.00		GC10B-1617-27
			Lin	nits		
Surrogate	CAS No.	% Recovery	(%	6)	\mathbf{Q}^{1}	File ID
Tetrachloro-meta-xylene	877-09-8	90.8	60.0	-120		GC10F-1631-27
Decachlorobiphenyl	2051-24-3	101	60.0	-120		GC10F-1631-27
Tetrachloro-meta-xylene	877-09-8	92.5	60.0	-120		GC10B-1617-27
Decachlorobiphenyl	2051-24-3	108	60.0	-120		GC10B-1617-27

¹Qualifier column where '*' denotes value outside the control limits or 'D' denotes value was diluted.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.

Quality Control Samples (Lab)



Quality Control Results Method Blank Job Number: 16010182

Pace Analytical Services, Inc. 2190 Technology Drive Schenectady, NY 12308 Phone: 518.346.4592 Fax: 518.381.6055

Client: ARCADIS Project: WI001368.0028.00001 MADISON KIPP Client Sample ID: Method Blank (AT00531B) Lab Sample ID: PBLK-81

Collection Date: N/A Sample Matrix: POLYURETHANE FOAM Received Date: N/A Percent Solid: N/A

Bat	tch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1: GC10	0B-1617-20	EPA Method TO-10A	01/15/2016 15:58	JKA	NA	NA	Phenomenex, Zebron ZB-5, 20 m, 0.18 mm ID, 0.18 µm
Prep 1: 3324	49	TO-10A	01/14/2016 15:30	MH	0.00m ³	5.00 mL	NA
Analyte		CAS No.	Result (ug)	PQL	Dilution Fact	or Flags	File ID
Aroclor 1016		12674-11-2	ND	0.100	1.00	U	GC10B-1617-20
Aroclor 1221		11104-28-2	ND	0.100	1.00	U	GC10B-1617-20
Aroclor 1232		11141-16-5	ND	0.100	1.00	U	GC10B-1617-20
Aroclor 1242		53469-21-9	ND	0.100	1.00	U	GC10B-1617-20
Aroclor 1248		12672-29-6	ND	0.100	1.00	U	GC10B-1617-20
Aroclor 1254		11097-69-1	ND	0.100	1.00	U	GC10B-1617-20
Aroclor 1260		11096-82-5	ND	0.100	1.00	U	GC10B-1617-20
Total PCB Amount	t > RL	1336-36-3	ND		1.00	U	GC10B-1617-20
				Lin	nits		
Surrogate		CAS No.	% Recovery	(%	()	\mathbf{Q}^{1}	File ID
Tetrachloro-meta-x	xylene	877-09-8	89.9	60.0	-120		GC10B-1617-20
Decachlorobipheny	yl	2051-24-3	108	60.0	-120		GC10B-1617-20

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Quality Control Results Method Blank Job Number: 16010182

Pace Analytical Services, Inc. 2190 Technology Drive Schenectady, NY 12308 Phone: 518.346.4592 Fax: 518.381.6055

Client: ARCADIS Project: W1001368.0028.00001 MADISON KIPP Client Sample ID: Method Blank (AT00531B) Lab Sample ID: PBLK-81

Collection Date: N/A Sample Matrix: POLYURETHANE FOAM Received Date: N/A Percent Solid: N/A

В	atch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1: GC	C10F-1631-20	EPA Method TO-10A	01/15/2016 15:58	JKA	NA	NA	Phenomenex, Zebron ZB-1MS, 20 m, 0.18 num ID, 0.18 µm
Prep 1: 33	249	TO-10A	01/14/2016 15:30	MH	0.00m ³	5.00 mL	NA
Analyte		CAS No.	Result (ug)	PQL	Dilution Fact	or Flags	File ID
Aroclor 1016		12674-11-2	ND	0.100	1.00	U	GC10F-1631-20
Aroclor 1221		11104-28-2	ND	0.100	1.00	U	GC10F-1631-20
Aroclor 1232		11141-16-5	ND	0.100	1.00	\mathbf{U}	GC10F-1631-20
Aroclor 1242		53469-21-9	ND	0.100	1.00	U	GC10F-1631-20
Aroclor 1248		12672-29-6	ND	0.100	1.00	U	GC10F-1631-20
Aroclor 1254		11097-69-1	ND	0.100	1.00	U	GC10F-1631-20
Aroclor 1260		11096-82-5	ND	0.100	1.00	U	GC10F-1631-20
Total PCB Amou	nt > RL	1336-36-3	ND		1.00	U	GC10F-1631-20
Commence		CAS N.	0/ D	Lin	nits		
Surrogate		CAS No.	% Recovery	(%	0)	Q	File ID
Tetrachloro-meta-	-xylene	877-09-8	95.1	60.0	-120		GC10F-1631-20
Decachlorobipher	nyl	2051-24-3	114	60.0	-120		GC10F-1631-20

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Quality Control Results Lab Control Sample (LCS) Job Number: 16010182

Pace Analytical Services, Inc. 2190 Technology Drive Schenectady, NY 12308 Phone: 518.346.4592 Fax: 518.381.6055

Client: ARCADIS Project: WI001368.0028.00001 MADISON KIPP Client Sample ID: Lab Control Sample (AT00531L) Lab Sample ID: LCS-81

Collection Date: N/A Sample Matrix: POLYURETHANE FOAM **Received Date: N/A** Percent Solid: N/A

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	GC10B-1617-21	EPA Method TO-10A	01/15/2016 16:10	JKA	NA	NA	Phenomenex, Zebron ZB-5, 20 m, 0.18 mm ID, 0.18 µm
Prep 1:	33249	TO-10A	01/14/2016 15:30	MH	0.00m ³	5,00 mL	NA

	Analyte Spiked	CAS No.	Added (ug)	LCS (ug)	LCS % Rec.	\mathbf{Q}^{1}	Limits (%)	
Aroclor 1242 53469-21-9 1.00 1.04 104 70.0-130	Aroclor 1242	53469-21-9	1.00	1.04	104		70.0-130	

es value outside the control limits. Note: RPD criteria does not apply

			Limits			
Surrogate	CAS No.	% Recovery	(%)	\mathbf{Q}^{T}	File ID	
Tetrachloro-meta-xylene	877-09-8	98.4	60.0-120		GC10B-1617-21	
Decachlorobiphenyl	2051-24-3	113	60.0-120		GC10B-1617-21	
1 Qualifier column where '*' denotes value	ue outside the control limits or	'D' denotes value was diluted.				

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Quality Control Results Lab Control Sample (LCS) Job Number: 16010182

Client: ARCADIS Project: WI001368.0028.00001 MADISON KIPP Client Sample ID: Lab Control Sample (AT00531L) Lab Sample ID: LCS-81

Collection Date: N/A Sample Matrix: POLYURETHANE FOAM **Received Date: N/A** Percent Solid: N/A

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	GC10F-1631-21	EPA Method TO-10A	01/15/2016 16:10	JKA	NA	NA	Phenomenex, Zebron ZB-1MS, 20 m, 0.18 mm ID, 0.18 µm
Prep 1:	33249	TO-10A	01/14/2016 15:30	MH	0.00m ³	5.00 mL	NA

Analyte Spiked	CAS No.	Added (ug)	LCS (ug)	LCS % Rec.	\mathbf{Q}^{1}	Limits (%)	
Aroclor 1242	53469-21-9	1.00	0.920	92.0		70.0-130	
¹ Oualifier column where '*' denote	s value outside the control limits Not	e RPD criteria does not	t apply if eithe	r the comple and	duplica	to annulo are not detected	

ample

Surrogate	CAS No.	% Recovery	Limits (%)	\mathbf{Q}^{1}	File ID
Tetrachloro-meta-xylene	877-09-8	90.0	60.0-120		GC10F-1631-21
Decachlorobiphenyl	2051-24-3	103	60.0-120		GC10F-1631-21
Qualifier column where '*' denotes value	ue outside the control limits or	'D' denotes value was diluted.			

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.

Pace Analytical

Quality Control Results Lab Control Sample - Duplicate (LCSD) Job Number: 16010182

Pace Analytical Services, Inc. 2190 Technology Drive Schenectady, NY 12308 Phone: 518.346.4592 Fax: 518.381.6055

Client: ARCADIS Project: WI001368.0028.00001 MADISON KIPP Client Sample ID: Lab Control Sample - Duplicate (AT00531S) Lab Sample ID: LCSD-81

Collection Date: N/A Sample Matrix: POLYURETHANE FOAM Received Date: N/A Percent Solid: N/A

	Batch ID	Method	Dat	e /	Analyst	Init W	t./Vol. 1	Final V	ol.	(Columi	1
Analysis 1: Prep 1:	GC10B-1617-22	2 EPA Method TO-10A TO-10A	01/15/2016	16:23 15:30	JKA MH	N/ 0.00	4 m ³	NA 5.00 m	Phenor L	menex, Zebron Z	B-5, 20 m, 0.1 NA	8 mm ID, 0.18 μm
		CASN	Added	LCSI	D LCS	D	Lim_{1}	uits	LCS % Rec.	Prec	ision	Limits
Analyte S Aroclor 1242		53469-21-9	1.00	(ug)	10	5	70.0	-130	104	0.957	¥.	20

Qualifier column where '*' denotes value outside the control limits. Note: RPD criteria does not apply if either the sample and duplicate sample are not detected.

Surrogate	CAS No.	% Recovery	Limits (%)	\mathbf{Q}^{1}	File ID
Tetrachloro-meta-xylene	877-09-8	95.4	60.0-120		GC10B-1617-22
Decachlorobiphenyl	2051-24-3	110	60.0-120		GC10B-1617-22

¹Qualifier column where '*' denotes value outside the control limits or 'D' denotes value was diluted.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Quality Control Results • Lab Control Sample - Duplicate (LCSD) Job Number: 16010182

Client: ARCADIS Project: WI001368.0028.00001 MADISON KIPP Client Sample ID: Lab Control Sample - Duplicate (AT00531S) Lab Sample ID: LCSD-81

Collection Date: N/A Sample Matrix: POLYURETHANE FOAM Received Date: N/A Percent Solid: N/A

	Batch ID	Method	Dat	e	Analyst	Init V	Vt./Vol.	Final	Vol.		Colum	n
Analysis 1: Prep 1:	GC10F-1631-22 33249	2 EPA Method TO-10A TO-10A	01/15/2016 01/14/2016	5 16:23 5 15:30	JKA MH	1 0.0	VA)0m³	N 5.00	A Phenom mL	enex, Zebron ZB	-1MS, 20 m, 0 NA).18 mm ID, 0.18 μm
Analyte Sp	piked	CAS No.	Added (ug)	LCS (ug	SD LC	SD Rec.	\mathbf{Q}^{1}	imits (%)	LCS % Rec.	Prec RPD	Q ¹	Limits (%)
Aroclor 1242		53469-21-9	1.00	0.956	9:	5.6	7	0.0-130	92.0	3.84		20

Qualifier column where '*' denotes value outside the control limits. Note: RPD criteria does not apply if either the sample and duplicate sample are not detected.

Surrogate	CAS No.	% Recovery	Limits (%)	\mathbf{Q}^{\dagger}	File ID	
Tetrachloro-meta-xylene	877-09-8	87.5	60.0-120		GC10F-1631-22	
Decachlorobiphenyl	2051-24-3	102	60.0-120		GC10F-1631-22	
1 Qualifier column where '*' denotes val	ue outside the control limits of	'D' denotes value was diluted.				

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Design & Consultancy for natural and

Mike Schmoller Project Manager Wisconsin Department of Natural Resources South Central Region 3911 Fish Hatchery Rd Fitchburg WI 53711

Subject:

Follow-Up Correspondence - Building Interior Polychlorinated Biphenyl (PCB) Supplemental Investigation Summary, Madison-Kipp Corporation, 201 Waubesa Street, Madison, Wisconsin. Facility ID No. 113125320, BRRTS No. 02-13-001569

Dear Mr. Schmoller:

On behalf of Madison-Kipp Corporation (MKC), the Building Interior Polychlorinated Biphenyl (PCB) Supplemental Investigation Summary letter dated February 15, 2016 was submitted to the Wisconsin Department of Natural Resources (WDNR) and United States Environmental Protection Agency (U.S. EPA) for review. The letter provided a summary of the supplemental sampling and floor coating activities, analytical results, and recommendations for PCBs within the manufacturing portion of the MKC facility located at 201 Waubesa Street, Madison, Wisconsin (Site). These activities were conducted in accordance with the U.S. EPA-approved Work Plan-Building Interior Polychlorinated Biphenyl Supplemental Sampling (Supplemental Work Plan) dated June 16, 2015.

All activities associated with the Supplemental Work Plan have been completed and satisfy the WDNR and U.S. EPA requirements. We kindly request your response and concurrence that no further actions are required related to the Supplemental Work Plan and PCBs in the interior of the MKC facility.

Arcadis U.S., Inc. 126 North Jefferson Street Suite 400 Milwaukee Wisconsin 53202 Tel 414 276 7742 Fax 414 276 7603 www.arcadis.com

ENVIRONMENT

Date: May 6, 2016

Contact: Jennine Trask

Phone: 414.277.6203

Email Jennine.trask @arcadis.com

Our ref: WI001368.0035 Mike Schmoller May 6, 2016

If you have any questions regarding this letter, please contact us at (414) 276-7742.

Sincerely,

Arcadis U.S., Inc.

Chuttoskill.

Christopher D. Kubacki, PE Senior Engineer

Thask

Jennine L. Trask, PE Project Manager

Electronic Copies: David Crass – Michael Bost Tony Koblinski – Madison-Kipp Alina Satkoski – Madison-Kipp Kenneth Zolnierczyk – U.S. EPA