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Solutia Inc.
575 Maryville Centre Drive
St. Louis, Missouri 63141

P.O. Box 66760
St. Louis, Missouri 63166-6760
Tel 314-674-1000

May 26, 2009

Mr. Kenneth Bardo - LU-9J
U.S. EPA Region V
Corrective Action Section
77 West Jackson Boulevard
Chicago, IL 60604-3507

VIA FEDEX

Re: PCB Groundwater Quality Assessment Program
1st Quarter 2009 Data Report
Solutia Inc., W. G. Krummrich Plant, Sauget, IL

Dear Mr. Bardo:

Enclosed please find the PCB Groundwater Quality Assessment Program 1st Quarter 2009 Data Report for Solutia Inc.'s W. G. Krummrich Plant, Sauget, IL.

If you have any questions or comments regarding this report, please contact me at (314) 674-3312 or gmrina@solutia.com

Sincerely,

A handwritten signature in blue ink that reads "Gerald M. Rinaldi".

Gerald M. Rinaldi
Manager, Remediation Services

Enclosure

cc: Distribution List

DISTRIBUTION LIST

**PCB Groundwater Quality Assessment Program
1st Quarter 2009 Data Report
Solutia Inc., W. G. Krummrich Plant, Sauget, IL**

USEPA

Leah Evison
USEPA Region 5 - SR6J, 77 West Jackson Boulevard, Chicago, IL 60604

IEPA

Sandra Bron
IEPA Bureau of Land/FSRS, 1021 North Grand Avenue East, Springfield, IL 62706

James Moore
IEPA Bureau of Land, 1021 North Grand Avenue East, Springfield, IL 62706

Booz Allen Hamilton

Dan Briller
Booz Allen Hamilton, 8283 Greensboro Drive, McLean, VA 22102

Solutia

Cathy Bumb 575 Maryville Centre Drive, St. Louis, MO 63141

Justin Prien 500 Monsanto Avenue, Sauget, IL 62206-1198

Jerry Rinaldi 575 Maryville Centre Drive, St. Louis, MO 63141

1ST QUARTER 2009
DATA REPORT

PCB GROUNDWATER QUALITY ASSESSMENT PROGRAM

SOLUTIA INC.
W.G. KRUMMRICH FACILITY
SAUGET, ILLINOIS

Prepared for
Solutia Inc.
575 Maryville Centre Drive
St. Louis, Missouri 63141

May 2009



URS Corporation
1001 Highland Plaza Drive West, Suite 300
St. Louis, MO 63110
(314) 429-0100
Project # 21562047.00003

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1.0 INTRODUCTION

This report presents the results of the 1st Quarter 2009 (1Q09) sampling event performed at the Solutia Inc. (Solutia) W.G. Krummrich Facility located in Sauget, Illinois (Site). This sampling event was conducted in accordance with the PCB Groundwater Quality Assessment Program Work Plan (Solutia 2008). The Site location map is presented in **Figure 1**.

The PCB Groundwater Quality Assessment Program well network consists of ten monitoring wells, as follows (**Figure 2**):

- Two source area wells, PMAMW-4S and PMAMW-4D, are screened in the Shallow Hydrogeologic Unit (SHU) (designated with an "S") and Deep Hydrogeologic Unit (DHU) (designated with a "D"), respectively.
- Three well clusters (PMAMW-1S/M, PMAMW-2S/M and PMAMW-3S/M) are located down-gradient of the source area. These clusters include wells screened in the SHU and Middle Hydrogeologic Unit (MHU) (designated with an "M").
- Two individual wells designated PMAMW-5M and PMAMW-6D are located further down-gradient of the source area, with PMAMW-5M screened in the MHU and PMAMW-6D screened in the DHU.

Groundwater samples were collected from nine of the ten monitoring wells during the 1Q09 sampling event. A dense non-aqueous phase liquid (DNAPL) sample was collected from monitoring well PMAMW-4S based on the presence of DNAPL in the monitoring well during sampling.

Field sampling activities were conducted in accordance with the procedures outlined in the PCB Groundwater Quality Assessment Program Work Plan, including the collection of appropriate quality assurance and quality control (QA/QC) samples. The following section summarizes the field investigative procedures.

2.0 FIELD PROCEDURES

URS Corporation (URS) conducted the 1Q09 PCB Groundwater Quality Assessment Program field activities February 23 through March 3, 2009.

Groundwater Level Measurements – On February 23 through 25, 2009, an oil/water interface probe was used to measure depth to static groundwater levels and determine the presence of non-aqueous phase liquids (NAPL) in the PCB Groundwater Quality Assessment Program well network. NAPL was only detected in monitoring well PMAMW04S. Depth to groundwater measurements were collected from accessible existing wells (i.e., GM-, K-, PSMW- and PMA-series) and piezometers clusters (installed for the Sauget Area 2 RI/FS and WGK CA-750

Environmental Indicator projects) specified in the PCB Groundwater Quality Assessment Program Work Plan.

Well gauging information for the 1Q09 event is presented in **Table 1**. As the middle and deep hydrogeologic units are the primary migration pathway for constituents present in groundwater at the WGK Facility, a groundwater potentiometric surface map based on water level data from wells screened in the MHU and DHU is presented as **Figure 3**.

Groundwater Sampling - Low-flow sampling techniques were used for groundwater sample collection on February 27 and March 3, 2009. At each monitoring well, disposable, low-density polyethylene tubing was attached to a submersible pump, which was then lowered into the well to the middle of the screened interval. Monitoring wells were purged at a rate of 200 mL/minute to minimize drawdown. If significant drawdown occurred, flow rates were reduced.

Drawdown was measured periodically throughout purging to ensure that it did not exceed 25% of the distance between the pump intake and the top of the screen. Once the flow rate and drawdown were stable, field measurements were collected approximately every three to five minutes. Purging of a well was considered complete when the following water quality parameters remained stable over three consecutive flow-thru cell volumes:

Parameter	Stabilization Guidelines
Dissolved Oxygen (DO)	+/- 10% or +/-0.2 mg/L, whichever is greatest
Oxidation-Reduction Potential (ORP)	+/- 20 mV
pH	+/- 0.2 units
Specific Conductivity	+/- 3%

Sampling commenced upon completion of purging. Prior to sample collection, the flow-thru cell was bypassed to allow for collection of uncompromised groundwater. Consistent with the work plan, samples were collected at a flow rate less than or equal to the rate at which stabilization was achieved.

Quality Assurance/Quality Control (QA/QC) samples consisting of analytical duplicates (AD) and equipment blanks (EB) were collected at a rate of 10% and matrix spike/matrix spike duplicates (MS/MSD) were collected at a rate of 5%, complying with the work plan. All samples were submitted to TestAmerica for PCB analysis.

Each sample was labeled immediately following collection. The sample identification system used for each sample involved the following nomenclature "PMAMW#-MMYY-QAC" where:

- **PMAMW# – Monitoring Well Location (PCB Manufacturing Area (PMA)) and Number**

- **MMYY – Month and year of sampling quarter, e.g.: February (First quarter), 2009 (0209)**
- **QAC – will denote QA/QC samples (when applicable):**
 - **EB- equipment blank**
 - **AD- analytical duplicate**
 - **MS or MSD – Matrix Spike or Matrix Spike Duplicate**

DNAPL Sampling – An interface probe detected 0.4 feet of DNAPL in monitoring well PMAMW-4S during monitoring well gauging prior to sampling. Consequently, a DNAPL sample was collected. Using the same process as groundwater sampling, DNAPL was pumped through polyethylene tubing into a 4 ounce glass sample container. Sample PMAMW04S-0209-DNAPL was submitted to TestAmerica for Total PCB analysis by EPA Method 680.

Upon collection and labeling, sample containers were immediately placed inside an iced cooler, packed in such a way as to help prevent breakage and maintain inside temperature at approximately 4°C. Field personnel recorded the project identification and number, sample description/location, required analysis, date and time of sample collection, type and matrix of sample, number of sample containers, analysis requested/comments, and sampler signature/date/time, with permanent ink on the chain-of-custody (COC). Prior to shipment, coolers were sealed between the lid and sides of the cooler with a custody seal, and then shipped to TestAmerica in Savannah, Georgia by means of overnight delivery service (FedEx for groundwater, UPS for DNAPL). Field sampling data sheets are included in **Appendix A**, COC forms are included in **Appendix B**.

3.0 LABORATORY PROCEDURES

Samples were analyzed by TestAmerica for PCBs using Method 680.

4.0 QUALITY ASSURANCE

Analytical data were reviewed for quality and completeness, as described in the PCB Groundwater Quality Assessment Work Plan. Data qualifiers were added, as appropriate, and are included on the data tables and the laboratory result pages. The Quality Assurance report is included as **Appendix C**. Laboratory result pages (i.e. Form 1's) along with data validation review sheets are included in **Appendix D**.

A total of 14 samples (nine investigative groundwater samples, one DNAPL, one field duplicate, one MS/MSD pair, one equipment blank) were prepared and analyzed by TestAmerica for PCBs. The results for the various analyses were submitted as sample delivery groups (SDGs) KPM028 and KPM029.

Evaluation of the analytical data followed procedures outlined in the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review, (USEPA, 1999) and the PCB Water Quality Assessment Work Plan (Solutia 2008). Based on the above mentioned criteria, results reported for the analyses performed were accepted for their intended use. Acceptable levels of accuracy and precision, based on MS/MSD, LCS, surrogate and field duplicate data were achieved for these SDGs to meet the project objectives. Completeness, which is defined to be the percentage of analytical results which are judged to be valid, including estimated (J/UJ) data was 100 percent.

5.0 OBSERVATIONS

This section presents a brief summary of the groundwater analytical results from the 1Q09 PCB Groundwater Quality Assessment sampling event. A summary of the laboratory results is provided in **Table 2** and the entire laboratory data package is provided in **Appendix D**.

Shallow Hydrogeologic Unit

A DNAPL sample was collected from source area SHU monitoring well PMAMW04S, and total PCBs were detected at a concentration of 224,400,000 µg/kg. Historically, measurable DNAPL has been observed in PMAMW04S during previous sampling events.

Of the three down-gradient PCB Groundwater Quality Assessment Program SHU monitoring wells (PMAMW-1S through PMAMW-3S), PCBs were only detected in monitoring well PMAMW-3S, at a concentration of 0.79 µg/L. These data indicate that PCBs in the SHU attenuated over the 300 to 400 ft distance between PMAMW04S and the three downgradient monitoring wells. PCB sampling results for the SHU are presented on **Figure 4**.

Middle/Deep Hydrogeologic Unit

Laboratory analytical results for monitoring well PMAMW04D located in the Former PCB Manufacturing Area indicated a total PCB concentration of 2.73 µg/L for the 1Q09 sampling event. PCBs were also detected in four of the five downgradient monitoring wells at concentrations of 0.16 µg/L (PMAMW-1M), 2.9 µg/L (PMAMW-2M)/(2.0 µg/L duplicate), 1.4 µg/L (PMAMW-3M), and 0.32 µg/L (PMAMW-6D). PCBs were not detected in the groundwater sample collected from monitoring well PMAMW-5M. **Figure 5** displays the 1Q09 PCB sampling results for the MHU/DHU.

The 1Q09 sampling event is the third event conducted under the PCB Groundwater Quality Assessment Program. Mann-Kendall trend analyses of total PCBs in unfiltered samples of groundwater from monitoring wells within (PMAMW-4D) or downgradient of (PMAMW-1M, -2M, -3S, and -3M) the former PCB Manufacturing Area are presented in **Tables 3** through **7**. No statistically significant trends in PCB concentrations were observed.

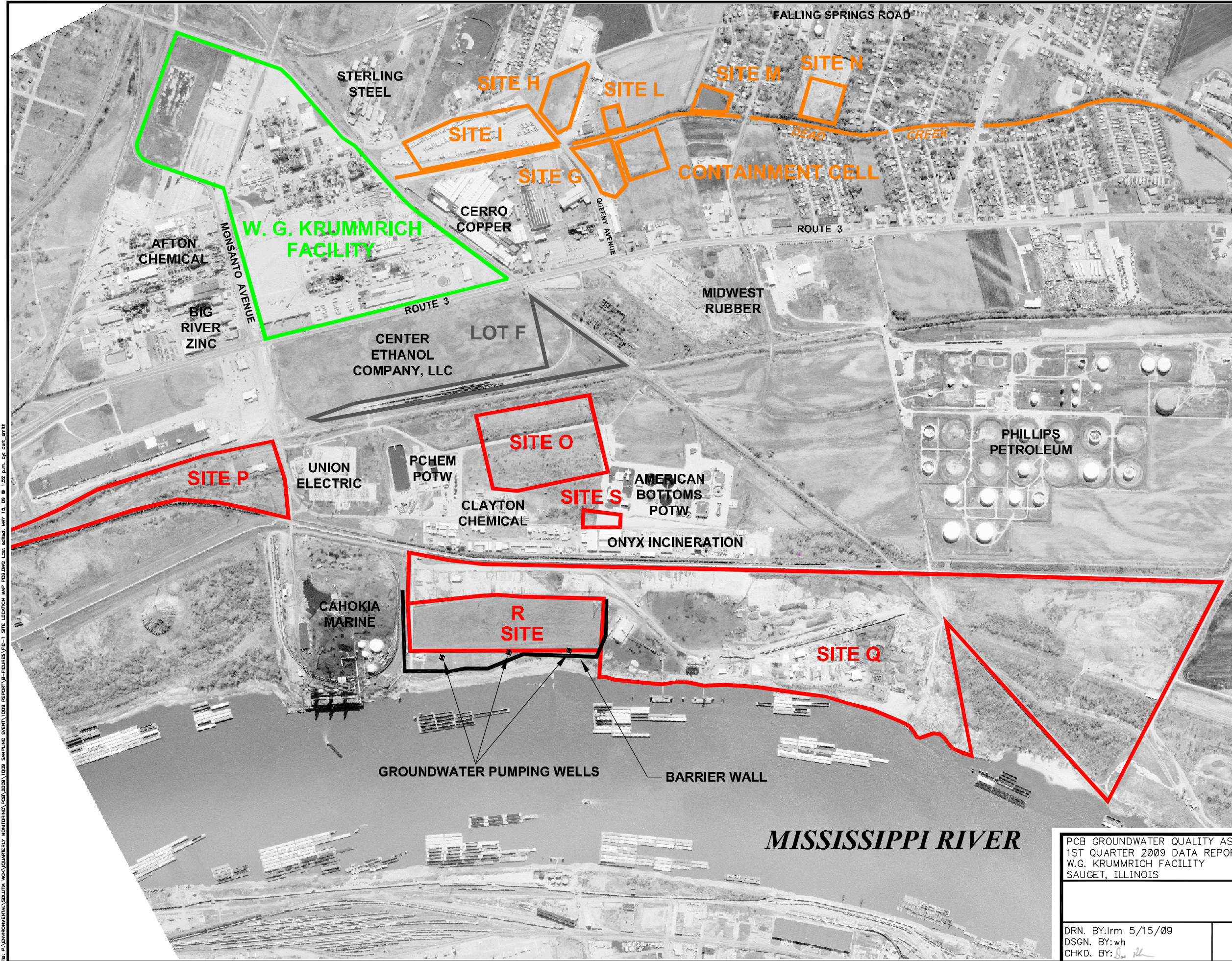
After eight quarters of sampling under the PCB Groundwater Quality Assessment Program, the Mann-Whitney U Test will be performed to determine whether or not concentrations in the second four quarters were higher or lower than the first four quarters. Linear regression analysis will be done for the eight quarters of data provided the data distribution allows the use of parametric statistical analysis.

6.0 REFERENCES

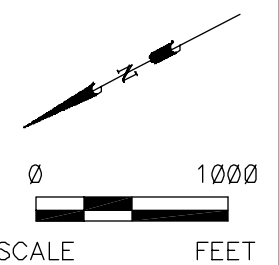
Solutia Inc, 2008. PCB Groundwater Quality Assessment Program, W.G. Krummrich Facility, Sauget, IL, Prepared by URS Corporation, May 2008.

U.S. Environmental Protection Agency (USEPA), 1999. Contract Laboratory Program National Functional Guidelines for Organic Data Review.

Figures



- LEGEND**
- W.G. KRUMMRICH FACILITY
 - SAUGET AREA #1
 - SAUGET AREA #2

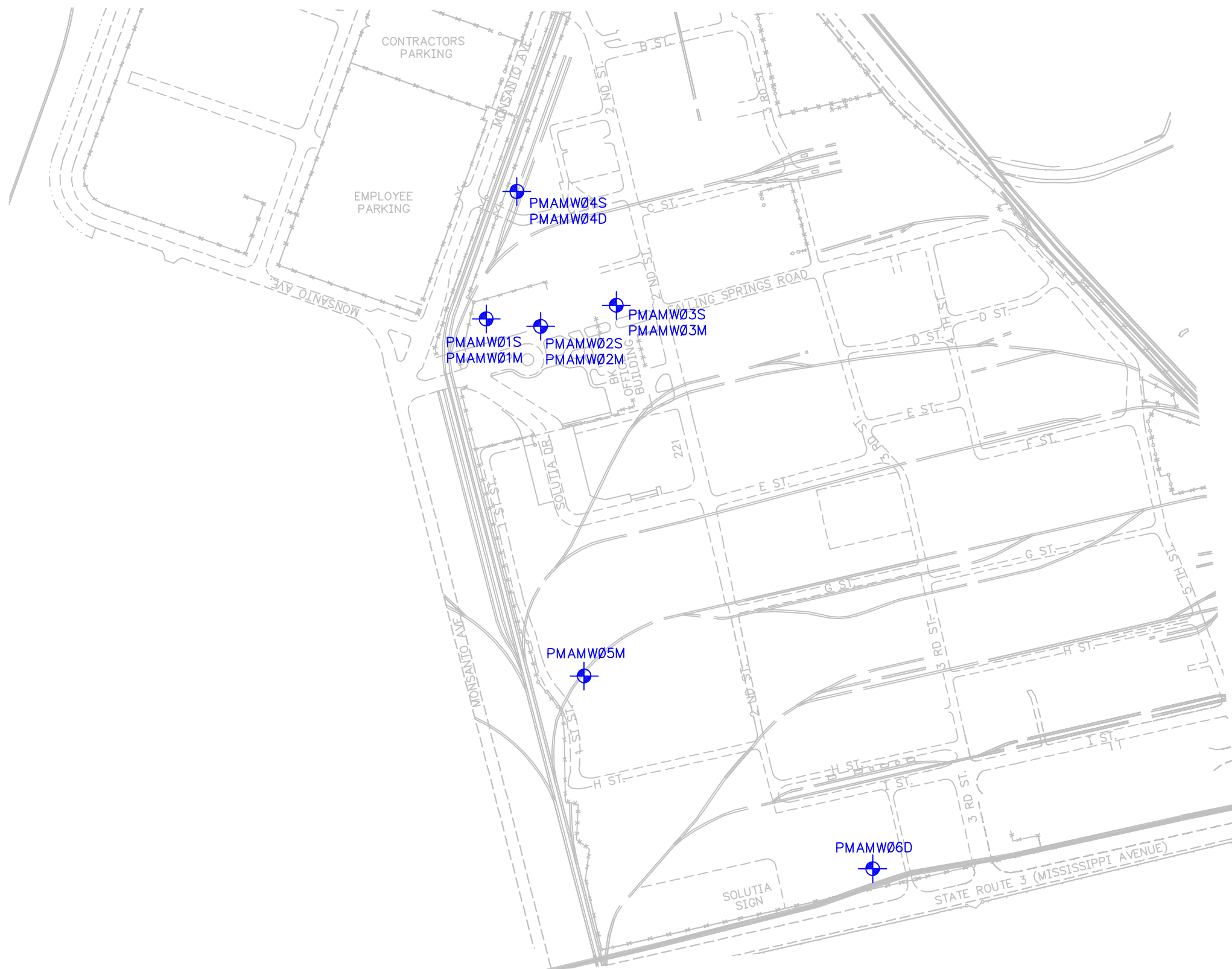


PCB GROUNDWATER QUALITY ASSESSMENT PROGRAM 1ST QUARTER 2009 DATA REPORT W.G. KRUMMRICH FACILITY SAUGET, ILLINOIS	PROJECT NO. 21562156
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URS	
DRN. BY: lrm 5/15/09 DSGN. BY: wh CHKD. BY: <i>[Signature]</i>	Site Location Map
	FIG. NO. 1

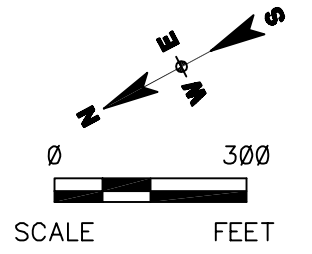
P:\ENVIRONMENTAL\SOLUTIONS\WORK\QUARTERLY MONITORING\PCB 2009\1009 SAMPLING EVENT\1009 REPORT\FIGURES\FIG-1 SITE LOCATION MAP FIGURE USE: 12.05.09 1:02 P.M. BY: GUC/EMR

FILE: P:\ENVIRONMENTAL\SOLUTIONS\WORK\QUARTERLY MONITORING\PCB\2009\1Q09\REPORT\B-FIGURES\FIG-2 FORMER PCB MANUFACTURING AREA\DWG LAYOUT.dwg DATE: MAY 15, 09 @ 1:53 P.M. BY: curt_smith



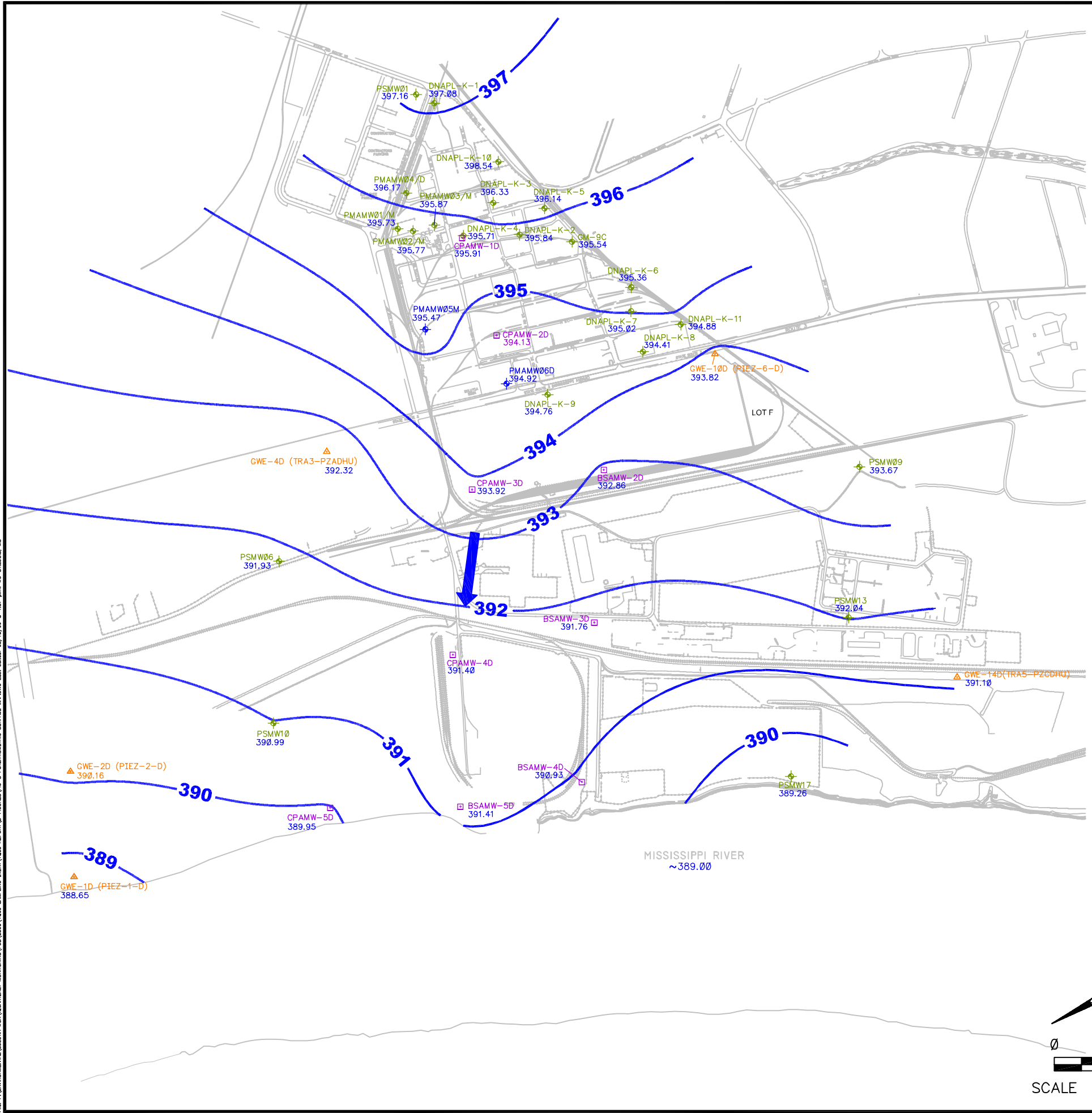
LEGEND

MONITORING WELL LOCATION



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URS		
DRN. BY: lrm 5/15/09 DSGN. BY: ekf CHKD. BY: <i>[Signature]</i>	Former PCB Manufacturing Area Monitoring Well Locations	FIG. NO. 2

F:\ENVIRONMENTAL\SCOUTA\WORK\QUARTERLY MONITORING\PCB\2009\009 SAMPLING EVENT\009 REPORT\FIGURES\FIG-3 POTENTIOMETRIC SURFACE MAP.DWG Last edited: 05/15/09 @ 1:57 p.m. WC-STLOUIS, MO

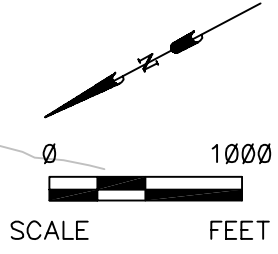


LEGEND

- LONG-TERM MONITORING WELL USED FOR GROUNDWATER CONTOURING
- + OTHER MONITORING WELL USED FOR GROUNDWATER CONTOURING
- △ PIEZOMETER CLUSTER USED FOR GROUNDWATER CONTOURING
- ⊠ GMCS EXTRACTION WELL USED FOR GROUNDWATER CONTOURING
- ▲ GMCS PIEZOMETER USED FOR GROUNDWATER CONTOURING
- **392** GROUNDWATER ELEVATION CONTOUR (FT NAVD)
- ← INDICATES GROUNDWATER FLOW DIRECTION

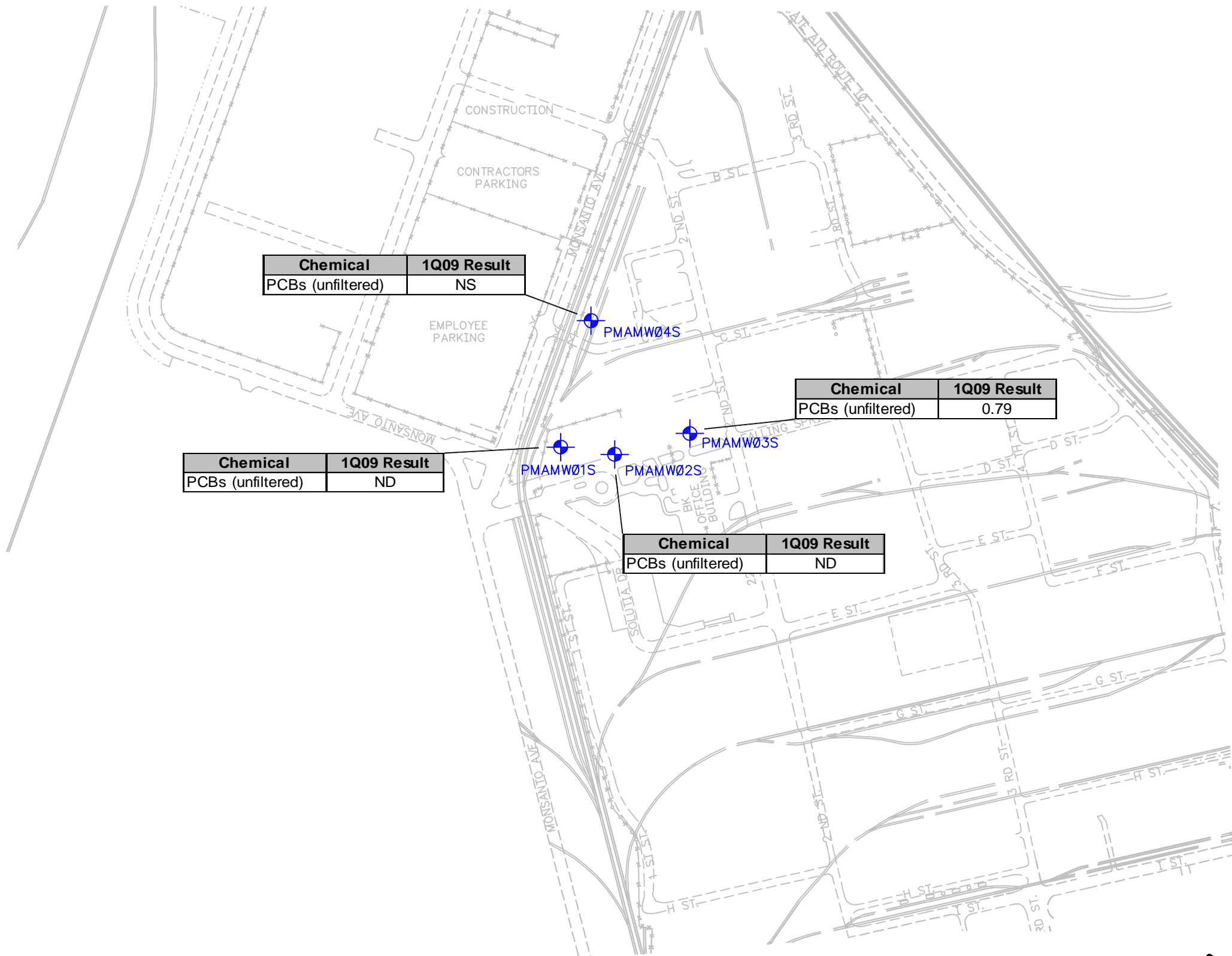
NOTES:

1. GROUNDWATER LEVELS WERE MEASURED FEBRUARY 23-25, 2009.
2. CONTOURS GENERATED PRIMARILY USING SURFER SOFTWARE VERSION 8. SOME INTERPRETATION WAS DONE USING PROFESSIONAL JUDGMENT AND CONTOUR LINES WERE MODIFIED BY HAND.
3. WELLS/PIEZOMETERS SHOWN IN GRAYSCALE WERE NOT USED FOR CONTOURING.
4. THE MISSISSIPPI RIVER STAGE ELEVATION PRESENTED ON THE FIGURE IS AN AVERAGE ELEVATION FOR THE TIME OF THE GAUGING EVENT. THE INFORMATION WAS OBTAINED FROM THE SITE R BUBBLER.
5. THE POTENTIOMETRIC SURFACE OBSERVED AROUND SITE R MAY BE ASSOCIATED WITH THE OPERATION OF THE SA2 GMCS.
6. NEITHER THE PHYSICAL NOR THE HYDROLOGIC BARRIERS CREATED BY THE SA2 GMCS WERE INCORPORATED INTO THE DEVELOPMENT OF THESE CONTOURS.
7. LOCATIONS WITH WELLS SCREENED IN BOTH THE MHU AND DHU UTILIZED THE DHU WELL FOR DEVELOPMENT OF THE POTENTIOMETRIC SURFACE MAP.



PCB GROUNDWATER QUALITY ASSESSMENT PROGRAM 1ST QUARTER 2009 DATA REPORT W.G. KRUMMRICH FACILITY SAUGET, ILLINOIS		PROJECT NO. 21562156
DRN. BY: lrm 5/15/09 DSGN. BY: ekf CHKD. BY: <i>[Signature]</i>	Potentiometric Surface Map Middle/Deep Hydrogeologic Unit	FIG. NO. 3

FILE: P:\ENVIRONMENTAL\SOLUTIONS\WORK\QUARTERLY MONITORING\PCB\2009\1Q09\REPORT\B-FIGURES\FIG-4 TOTAL PCBs SHU WELLS.DWG. Last edited: MAY 21, 09 @ 4:59 P.M. by: curt_arnth



Chemical	1Q09 Result
PCBs (unfiltered)	NS

Chemical	1Q09 Result
PCBs (unfiltered)	ND

Chemical	1Q09 Result
PCBs (unfiltered)	0.79

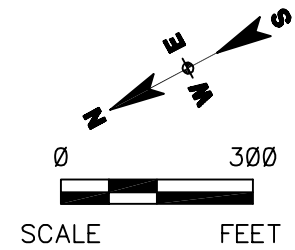
Chemical	1Q09 Result
PCBs (unfiltered)	ND

LEGEND

 MONITORING WELL LOCATION

NOTES:

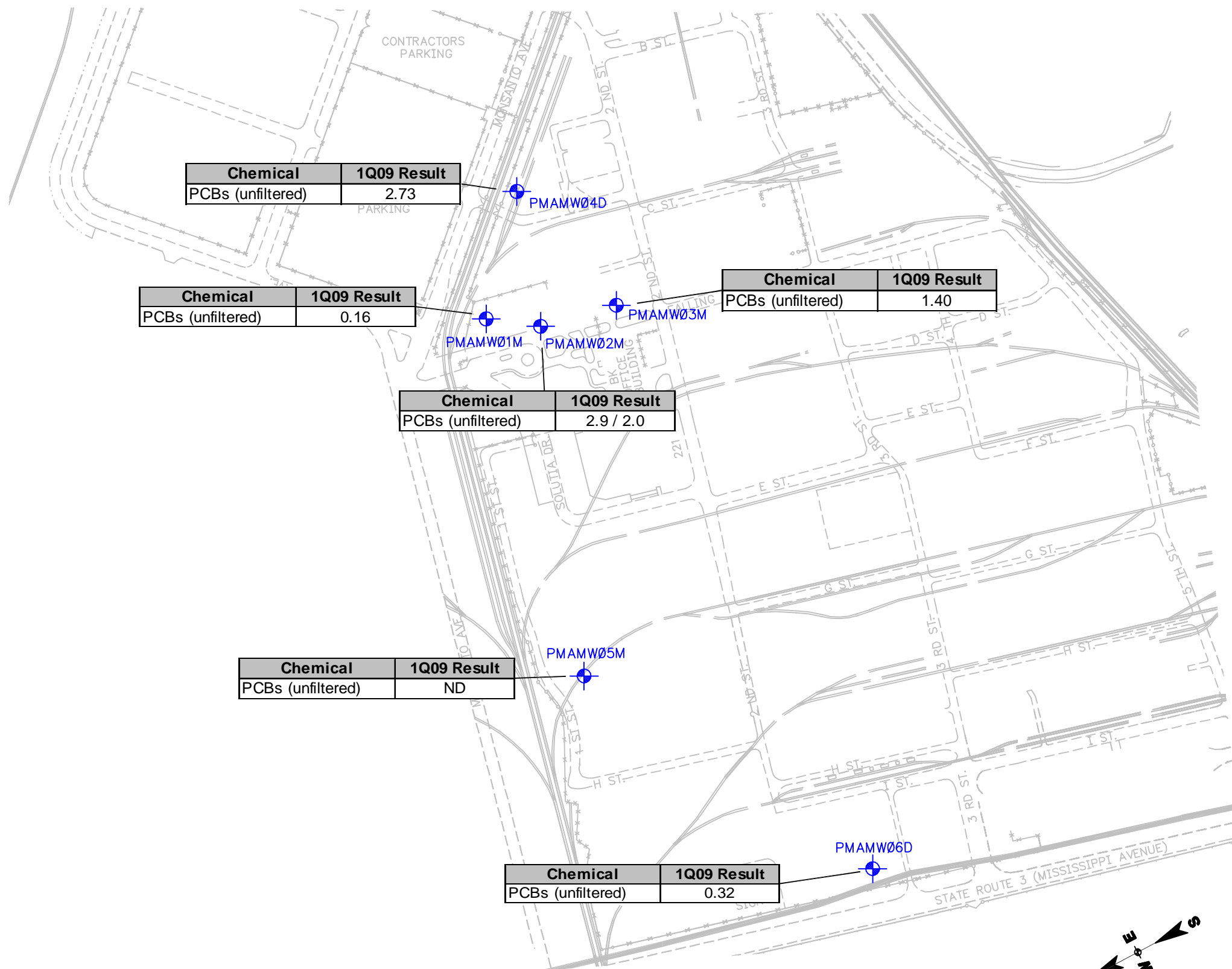
- TOTAL PCB RESULTS INCLUDE THE SUM OF ALL METHOD 680 HOMOLOGS.
- RESULTS ARE SHOWN IN ug/L.
- ND DENOTES NOT DETECTED.
- NS DENOTES NOT SAMPLED. PMAMW04S CONTAINED DNAPL AND THE GROUNDWATER WAS NOT SAMPLED DURING THE 1Q09 SAMPLING EVENT.




PCB GROUNDWATER QUALITY ASSESSMENT PROGRAM 1ST QUARTER 2009 DATA REPORT W.G. KRUMMRICH FACILITY SAUGET, ILLINOIS	PROJECT NO. 21562156
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DRN. BY: lrm 5/21/09 DSGN. BY: ekf CHKD. BY: <i>[Signature]</i>	PCB Results - SHU Wells	FIG. NO. 4
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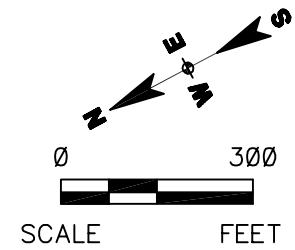


LEGEND

 MONITORING WELL LOCATION

NOTES:

1. TOTAL PCB RESULTS INCLUDE THE SUM OF ALL METHOD 680 HOMOLOGS.
2. RESULTS ARE SHOWN IN ug/L.
3. ND DENOTES NOT DETECTED.
4. MULTIPLE SAMPLE RESULTS INDICATE A DUPLICATE SAMPLE



PCB GROUNDWATER QUALITY ASSESSMENT PROGRAM 1ST QUARTER 2009 DATA REPORT W.G. KRUMMRICH FACILITY SAUGET, ILLINOIS		PROJECT NO. 21562156
URS		
DRN. BY: lrm 5/15/09 DSGN. BY: ekf CHKD. BY: <i>[Signature]</i>	PCB Results - MHU/DHU Wells	FIG. NO. 5

Tables

See last page of table for notes.

**Table 1
Monitoring Well Gauging Information**

Well ID	Construction Details						February 23-25, 2009				Area
	Ground Elevation (feet)*	Casing Elevation* (feet)	Depth to Top of Screen (feet bgs)	Depth to Bottom of Screen (feet bgs)	Top of Screen Elevation* (feet)	Bottom of Screen Elevation* (feet)	Depth to Water (feet btoc)	Depth to Product (feet btoc)	Depth to Bottom (feet btoc)	Water Elevation* (feet)	
Shallow Hydrogeologic Unit (SHU 395-380 feet NAVD 88)											
PMAMW01S	410.06	410.06	20.18	25.18	389.88	384.88	14.07	--	24.93	395.99	WGK
PMAMW02S	411.66	411.66	22.94	27.94	388.72	383.72	15.88	--	27.35	395.78	WGK
PMAMW03S	412.06	412.06	22.71	27.71	389.35	384.35	16.18	--	27.42	395.88	WGK
PMAMW04S	410.43	410.43	20.99	25.99	389.44	384.44	14.22	24.98	25.38	396.21	WGK
Middle Hydrogeologic Unit (MHU 380-350 feet NAVD 88)											
PMAMW01M	410.08	410.08	54.54	59.54	355.54	350.54	14.35	--	59.66	395.73	WGK
PMAMW02M	411.93	411.93	56.87	61.87	355.06	350.06	16.16	--	27.42	395.77	WGK
PMAMW03M	412.10	412.10	57.07	62.07	355.03	350.03	16.23	--	61.88	395.87	WGK
PMAMW05M	411.27	410.97	52.17	57.17	359.10	354.10	15.50	--	57.02	395.47	WGK
PSMW01	409.37	412.59	34.56	39.56	374.81	369.81	15.43	--	46.09	397.16	WGK
Deep Hydrogeologic Unit (DHU 350 feet NAVD 88 - Bedrock)											
BSAMW-2D	412.00	415.13	65.79	70.79	346.21	341.21	22.27	--	77.10	392.86	WGK
BSAMW-3D	412.91	415.74	104.80	109.80	308.11	303.11	23.98	--	114.97	391.76	WGK
BSAMW-4D	425.00	424.69	118.54	123.54	306.46	301.46	33.76	--	123.21	390.93	WGK
BSAMW-5D	420.80	420.49	116.25	120.85	304.95	299.95	29.08	--	120.95	391.41	WGK
CPAMW-1D	408.62	408.32	66.12	71.12	342.50	337.50	12.41	--	70.88	395.91	WGK
CPAMW-2D	408.51	408.20	99.96	104.96	308.55	303.55	14.07	--	104.80	394.13	WGK
CPAMW-3D	410.87	410.67	101.90	106.90	308.97	303.97	16.75	--	113.20	393.92	WGK
CPAMW-4D	421.57	421.20	116.44	121.44	305.13	300.13	29.80	--	114.81	391.40	WGK
CPAMW-5D	411.03	413.15	105.51	110.51	305.52	300.52	23.20	--	114.69	389.95	WGK
DNAPL-K-1	413.07	415.56	108.2	123.2	304.87	289.87	18.48	--	123.35	397.08	WGK
DNAPL-K-2	407.94	407.72	97.63	112.63	310.31	295.31	11.88	--	112.59	395.84	WGK
DNAPL-K-3	412.13	411.91	104.8	119.8	307.33	292.33	15.58	--	119.47	396.33	WGK
DNAPL-K-4	409.48	409.15	102.55	117.55	306.93	291.93	13.44	--	115.80	395.71	WGK
DNAPL-K-5	412.27	411.91	102.15	117.15	310.12	295.12	15.77	--	116.61	396.14	WGK
DNAPL-K-6	410.43	410.09	102.47	117.47	307.96	292.96	14.73	--	117.09	395.36	WGK
DNAPL-K-7	408.32	407.72	100.4	115.4	307.92	292.92	12.70	--	115.59	395.02	WGK
DNAPL-K-8	408.56	411.38	102.65	117.65	305.91	290.91	16.97	--	117.71	394.41	WGK
DNAPL-K-9	406.45	405.97	97.42	112.42	309.03	294.03	11.21	--	111.35	394.76	WGK
DNAPL-K-10	413.50	413.25	105.43	120.43	308.07	293.07	16.71	--	120.40	396.54	WGK
DNAPL-K-11	412.20	411.78	105.46	120.46	306.74	291.74	16.90	--	120.36	394.88	WGK
GM-9C	409.54	411.21	88	108	321.54	301.54	15.67	--	108.46	395.54	WGK

See last page of table for notes.

**Table 1
Monitoring Well Gauging Information**

Well ID	Construction Details						February 23-25, 2009				Area
	Ground Elevation (feet)*	Casing Elevation* (feet)	Depth to Top of Screen (feet bgs)	Depth to Bottom of Screen (feet bgs)	Top of Screen Elevation* (feet)	Bottom of Screen Elevation* (feet)	Depth to Water (feet btoc)	Depth to Product (feet btoc)	Depth to Bottom (feet btoc)	Water Elevation* (feet)	
Deep Hydrogeologic Unit (DHU 350 feet NAVD 88 - Bedrock) (continued)											
GWE-1D (PIEZ-1D)	412.80	415.60	117	127	295.80	285.80	26.95	--	128.72	388.65	Sauget Area 2
GWE-2D (PIEZ-2D)	417.45	417.14	127	137	290.45	280.45	26.98	--	136.95	390.16	Sauget Area 2
GWE-4D (TRA3-PZADHU)	406.05	405.74	74	80	332.05	326.05	13.42	--	78.91	392.32	WGK
GWE-10D (PIEZ-6D)	410.15	412.87	102.5	112.5	307.65	297.65	19.05	--	115.00	393.82	Lot F
GWE-14D (TRA5-PZCDHU)	420.47	422.90	90	96	330.47	324.47	31.80	--	97.18	391.10	WGK
PMAMW04D	411.22	410.88	68.84	73.84	342.38	337.38	14.71	--	73.45	396.17	WGK
PMAMW06D	407.63	407.32	96.49	101.49	311.14	306.14	12.40	--	101.41	394.92	WGK
PSMW06	404.11	406.63	99.80	104.80	304.31	299.31	14.70	--	109.98	391.93	WGK
PSMW09	403.92	403.52	100.40	105.40	303.52	298.52	9.85	--	105.31	393.67	WGK
PSMW10	409.63	412.18	101.23	106.23	308.40	303.40	21.19	--	111.45	390.99	WGK
PSMW13	405.80	405.53	106.08	111.08	299.72	294.72	13.49	--	110.88	392.04	WGK
PSMW17 (BWMW-4D)	420.22	423.26	121.25	126.25	298.97	293.97	34.00	--	134.20	389.26	WGK

Notes:

* - Elevation based upon North American Vertical Datum (NAVD) 88 datum

bgs - below ground surface

btoc - Below top of casing

NG - not gauged

**Table 2
Groundwater and DNAPL Analytical Detections**

Sample ID	Sample Date	Units	Monochlorobiphenyl (ug/L)	Dichlorobiphenyl (ug/L)	Trichlorobiphenyl (ug/L)	Tetrachlorobiphenyl (ug/L)	Pentachlorobiphenyl (ug/L)	Hexachlorobiphenyl (ug/L)	Heptachlorobiphenyl (ug/L)	Octachlorobiphenyl (ug/L)	Nonachlorobiphenyl (ug/L)	Decachlorobiphenyl (ug/L)
Shallow Hydrologic Unit												
PMAMW01S-0209	2/27/2009	µg/L	<0.097	<0.097	<0.097	<0.19	<0.19	<0.19	<0.29	<0.29	<0.49	<0.49
PMAMW02S-0209	2/27/2009	µg/L	<0.097	<0.097	<0.097	<0.19	<0.19	<0.19	<0.29	<0.29	<0.49	<0.49
PMAMW03S-0209	3/3/2009	µg/L	0.67	0.12	<0.097	<0.19	<0.19	<0.19	<0.29	<0.29	<0.49	<0.49
PMAMW-4S-0209-DNAPL	3/3/2009	µg/kg	<200,000	3,400,000	20,000,000	51,000,000	36,000,000	62,000,000	42,000,000	10,000,000	<1,000,000	<1,000,000
Middle / Deep Hydrologic Unit												
PMAMW01M-0209	2/27/2009	µg/L	0.16	<0.098	<0.098	<0.2	<0.2	<0.2	<0.29	<0.29	<0.49	<0.49
PMAMW02M-0209	2/27/2009	µg/L	2.0 J	<0.1	<0.1	<0.2	<0.2	<0.2	<0.3	<0.3	<0.5	<0.5
PMAMW02M-0209-AD	2/27/2009	µg/L	2 J	<0.1	<0.1	<0.2	<0.2	<0.2	<0.3	<0.3	<0.5	<0.5
PMAMW03M-0209	3/3/2009	µg/L	1.4	<0.097	<0.097	<0.19	<0.19	<0.19	<0.29	<0.29	<0.49	<0.49
PMAMW04D-0209	3/3/2009	µg/L	0.20	0.21	0.11	0.54	0.38	0.79	0.5	<0.29	<0.49	<0.49
PMAMW05M-0209	2/27/2009	µg/L	<0.098	<0.098	<0.098	<0.2	<0.2	<0.2	<0.29	<0.29	<0.49	<0.49
PMAMW06D-0209	2/27/2009	µg/L	0.32	<0.098	<0.098	<0.2	<0.2	<0.2	<0.29	<0.29	<0.49	<0.49

Notes:

µg/L = micrograms per liter

µg/Kg = micrograms per kilogram

< = Result is non-detect, less than the reporting limit

AD = Analytical Duplicate

J = Estimated value

BOLD indicates concentration greater than the reporting limit

**Table 3
Monitoring Well PMA MW-1M Mann-Kendall Trend Analysis**

W.G.Krummrich Facility PCB Mfg. Area Monitoring Well MW-1M Mann-Kendall Trend Analysis													
	Event 1	Event 2	Event 3	Event 4	Event 5	Event 6	Event 7	Event 8	Event 9	Event 10	Event 11	Event 12	Row Total
	2Q06	3Q06	4Q06	1Q07	2Q07	3Q07	4Q07	1Q08	2Q08	3Q08	4Q08	1Q09	
Total PCBs, µg/L	ND	0.24	0.21	0.17	0.26	0.29	48	ND	0.18	0.38	0.26	0.16	
Compare to Event 1		1	1	1	1	1	1	NA	1	1	1	1	10
Compare to Event 2			-1	-1	1	1	1	-1	-1	1	1	-1	0
Compare to Event 3				-1	1	1	1	-1	-1	1	1	-1	1
Compare to Event 4					1	1	1	-1	1	1	1	-1	4
Compare to Event 5						1	1	-1	-1	1	1	-1	1
Compare to Event 6							1	-1	-1	1	-1	-1	-2
Compare to Event 7								-1	-1	-1	-1	-1	-5
Compare to Event 8									1	1	1	1	4
Compare to Event 9										1	1	-1	1
Compare to Event 10											-1	-1	-2
Compare to Event 11												-1	-1

Mann-Kendall Statistic (S) 11

90 % Confidence Mann-Kendall Statistic 20

**Table 4
Monitoring Well PMA MW-2M Mann-Kendall Trend Analysis**

W.G.Krummrich Facility PCB Mfg. Area Monitoring Well MW-2M Mann-Kendall Trend Analysis													
	Event 1	Event 2	Event 3	Event 4	Event 5	Event 6	Event 7	Event 8	Event 9	Event 10	Event 11	Event 12	Row Total
	2Q06	3Q06	4Q06	1Q07	2Q07	3Q07	4Q07	1Q08	2Q08	3Q08	4Q08	1Q09	
Total PCBs, µg/L	2.3	2.4	2.8	2.1	3.3	2.5	3.1	1.7	3.0	4.3	2.5	2.9	
Compare to Event 1		1	1	-1	1	1	1	-1	1	1	1	1	7
Compare to Event 2			1	-1	1	1	1	-1	1	1	1	1	6
Compare to Event 3				-1	1	-1	1	-1	1	1	-1	1	1
Compare to Event 4					1	1	1	-1	1	1	1	1	6
Compare to Event 5						-1	-1	-1	-1	1	-1	-1	-5
Compare to Event 6							1	-1	1	1	1	1	4
Compare to Event 7								-1	-1	1	-1	-1	-3
Compare to Event 8									1	1	1	1	4
Compare to Event 9										1	-1	-1	-1
Compare to Event 10											-1	-1	-2
Compare to Event 11												1	1

Mann-Kendall Statistic (S) 18

90 % Confidence Mann-Kendall Statistic 20

**Table 5
Monitoring Well PMA MW-3S Mann-Kendall Trend Analysis**

W.G.Krummrich Facility PCB Mfg. Area Monitoring Well MW-3S Mann-Kendall Trend Analysis													
	Event 1	Event 2	Event 3	Event 4	Event 5	Event 6	Event 7	Event 8	Event 9	Event 10	Event 11	Event 12	Row Total
	2Q06	3Q06	4Q06	1Q07	2Q07	3Q07	4Q07	1Q08	2Q08	3Q08	4Q08	1Q09	
Total PCBs, µg/L	0.66	0.32	0.20	0.35	0.80	0.30	0.21	0.25	0.64	0.26	0.24	0.79	
Compare to Event 1		-1	-1	-1	1	-1	-1	-1	-1	-1	-1	1	-7
Compare to Event 2			-1	1	1	-1	-1	-1	1	-1	-1	1	-2
Compare to Event 3				1	1	1	1	1	1	1	1	1	9
Compare to Event 4					1	-1	-1	-1	1	-1	-1	1	-2
Compare to Event 5						-1	-1	-1	-1	-1	-1	-1	-7
Compare to Event 6							-1	-1	1	-1	-1	1	-2
Compare to Event 7								1	1	1	1	1	5
Compare to Event 8									1	1	-1	1	2
Compare to Event 9										-1	-1	1	-1
Compare to Event 10											-1	1	0
Compare to Event 11												1	1

Mann-Kendall Statistic (S) **-4**

90 % Confidence Mann-Kendall Statistic **-20**

**Table 6
Monitoring Well PMA MW-3M Mann-Kendall Trend Analysis**

W.G.Krummrich Facility PCB Mfg. Area Monitoring Well MW-3M Mann-Kendall Trend Analysis													
	Event 1	Event 2	Event 3	Event 4	Event 5	Event 6	Event 7	Event 8	Event 9	Event 10	Event 11	Event 12	Row Total
	2Q06	3Q06	4Q06	1Q07	2Q07	3Q07	4Q07	1Q08	2Q08	3Q08	4Q08	1Q09	
Total PCBs, µg/L	5.18	1.90	ND	0.77	ND	0.86	0.76	0.39	0.92	1.3	0.71	1.4	
Compare to Event 1		-1	-1	-1	-1	-1	-1	-1	-1	-1	-1	-1	-11
Compare to Event 2			-1	-1	-1	-1	-1	-1	-1	-1	-1	-1	-10
Compare to Event 3				1	NA	1	1	1	1	1	1	1	8
Compare to Event 4					-1	1	-1	-1	1	1	-1	1	0
Compare to Event 5						1	1	1	1	1	1	1	7
Compare to Event 6							-1	-1	1	1	-1	1	0
Compare to Event 7								-1	1	1	-1	1	1
Compare to Event 8									1	1	1	1	4
Compare to Event 9										1	-1	1	1
Compare to Event 10											-1	1	0
Compare to Event 11												1	1

Mann-Kendall Statistic (S) 1

90 % Confidence Mann-Kendall Statistic 20

Table 7
Monitoring Well PMA MW-4D Mann-Kendall Trend Analysis

W.G.Krummrich Facility PCB Mfg. Area Monitoring Well MW-4D Mann-Kendall Trend Analysis												
	Event 1	Event 2	Event 3	Event 4	Event 5	Event 6	Event 7	Event 8	Event 9	Event 10	Event 11	Row Total
	2Q06	3Q06	4Q06	1Q07	2Q07	3Q07	4Q07	1Q08	2Q08	4Q08	1Q09	
Total PCBs, µg/L	0.34	0.10	2.07	0.33	0.50	0.35	0.23	0.27	0.44	0.27	2.73	
Compare to Event 1		-1	1	-1	1	1	-1	-1	1	-1	1	0
Compare to Event 2			1	1	1	1	1	1	1	1	1	9
Compare to Event 3				-1	-1	-1	-1	-1	-1	-1	1	-6
Compare to Event 4					1	1	-1	-1	1	-1	1	1
Compare to Event 5						-1	-1	-1	-1	-1	1	-4
Compare to Event 6							-1	-1	1	-1	1	-1
Compare to Event 7								1	1	1	1	4
Compare to Event 8									1	1	1	3
Compare to Event 9										-1	1	0
Compare to Event 10											1	1

Mann-Kendall Statistic (S) **7**

90 % Confidence Mann-Kendall Statistic **18**

Appendix A

Groundwater Purging and Sampling Forms

LOW FLOW GROUNDWATER SAMPLING DATA SHEET

PROJECT NAME: PCB GW Quality Assessment PROJECT NUMBER: 21562156-00001 FIELD PERSONNEL: M. Corbett, S. Moore
 DATE: 2/27/09 WEATHER: overcast, 37°
 MONITORING WELL ID: PMAMW01M SAMPLE ID: PMAMW01M-0209

INITIAL DATA

Well Diameter: 2 in
 Measured Well Depth (btoc): 59.30 ft
 Constructed Well Depth (btoc): 59.30 ft
 Depth to Water (btoc): 14.58 ft
 Depth to LNAPL/DNAPL (btoc): — ft
 Depth to Top of Screen (btoc): 54.36 ft
 Screen Length: 5 ft

Water Column Height (do not include LNAPL or DNAPL): 44.72 ft btoc
 If Depth to Top of Screen is > Depth to Water AND Screen Length is < 4 feet,
 Place Pump at: Total Well Depth - 0.5 (Screen Length + DNAPL Column Height) = 56.80 ft btoc
 If Depth to Top of Screen is < Depth to Water AND Water Column Height and Screen Length are < 4ft,
 Place Pump at: Total Well Depth - (0.5 X Water Column Height + DNAPL Column Height) = — ft btoc
 If Screen Length and/or water column height is < 4 ft, Place Pump at: Total Well Depth - 2 ft = — ft btoc

Volume of Flow Through Cell): 1,150 mL
 Minimum Purge Volume =
 (3 x Flow Through Cell Volume) 3,450 mL
 Ambient PID/FID Reading: 0.0 ppm
 Wellbore PID/FID Reading: 0.3 ppm

PURGE DATA

Pump Type: Stainless Steel Monsoon

Purge Volume (mL)	Time	Depth to Water (ft)	Color	Odor	±0.1 units	±3%	±10% or ±2 mg/L	±20 mV		
					pH	Temp (°C)	Cond. (ms/cm)	Turbidity (NTUs)	DO (mg/l)	ORP (mv)
0	1055	14.58	colorless	hydrocarbon	6.90	14.23	2.153	2.2	7.76	-122.8
1200	1101	↓	↓	↓	6.87	14.47	2.266	0.7	9.14	-148.2
2400	1107	↓	↓	↓	6.87	14.75	2.285	1.8	9.83	-156.6
3600	1113	↓	↓	↓	6.90	14.74	2.286	1.3	12.34	-160.6
4800	1118	↓	↓	↓	6.90	14.74	2.290	0.1	12.57	-161.3
6000	1126	↓	↓	↓	6.90	14.74	2.297	-1.2	12.96	-165.1

Start Time: 1055 Elapsed Time: 30 min. Water Quality Meter ID: YSI 6920
 Stop Time: 1125 Average Purge Rate (mL/min): 200 Date Calibrated: 2/27/09

SAMPLING DATA

Sample Date: 2/27/09 Sample Time: 1130 Analysis: Total PCBs
 Sample Method: Stainless Steel Monsoon Sample Flow Rate: 200 mL/min Date Calibrated: NA

COMMENTS:

LOW FLOW GROUNDWATER SAMPLING DATA SHEET

PROJECT NAME: PCB GW Quality Assessment PROJECT NUMBER: 21562156.0001 FIELD PERSONNEL: M. Corbett, S. Moore
 DATE: 2/27/09 WEATHER: overcast, 37°
 MONITORING WELL ID: PMAMW01S SAMPLE ID: PMAMW01S-0209, PMAMW01S-0209-MS, PMAMW01S-0209-MSD

INITIAL DATA

Well Diameter: 2 in
 Measured Well Depth (btoc): 24.44 ft
 Constructed Well Depth (btoc): 24.94 ft
 Depth to Water (btoc): 14.00 ft
 Depth to LNAPL/DNAPL (btoc): — ft
 Depth to Top of Screen (btoc): 19.94 ft
 Screen Length: 5 ft

Water Column Height (do not include LNAPL or DNAPL): 10.88 ft btoc
 If Depth to Top of Screen is > Depth to Water AND Screen Length is < 4 feet,
 Place Pump at: Total Well Depth - 0.5 (Screen Length + DNAPL Column Height) = 22.44 ft btoc
 If Depth to Top of Screen is < Depth to Water AND Water Column Height and Screen Length are < 4ft,
 Place Pump at: Total Well Depth - (0.5 X Water Column Height + DNAPL Column Height) = — ft btoc
 If Screen Length and/or water column height is < 4 ft, Place Pump at: Total Well Depth - 2 ft = — ft btoc

Volume of Flow Through Cell): 1,150 mL
 Minimum Purge Volume =
 (3 x Flow Through Cell Volume) 3,450 mL
 Ambient PID/FID Reading: 0.0 ppm
 Wellbore PID/FID Reading: 0.0 ppm

PURGE DATA

Pump Type: Stainless Steel Monsoon

Purge Volume (mL)	Time	Depth to Water (ft)	Color	Odor	±0.2 units	±3%	±10% or ±2 mg/L	±20 mV		
					pH	Temp (°C)	Cond. (ms/cm)	Turbidity (NTUs)	DO (mg/l)	ORP (mv)
0	0955	14.32	colorless	none	6.47	15.08	1.457	0.5	9.90	152.7
1200	1001	14.28	↓	↓	6.54	15.15	1.461	-0.4	10.58	133.8
2400	1007	14.25	↓	↓	6.53	15.17	1.493	-1.6	10.69	117.3
3600	1013	14.25	↓	↓	6.53	15.26	1.500	-1.8	10.48	112.6
4800	1019	14.25	↓	↓	6.52	15.11	1.508	-1.8	10.33	109.0

Start Time: 0955 Elapsed Time: 24 min. Water Quality Meter ID: YSI 6920
 Stop Time: 1019 Average Purge Rate (mL/min): 200 Date Calibrated: 2/27/09

SAMPLING DATA

Sample Date: 2/27/09 Sample Time: 1025 Analysis: Total PCBs
 Sample Method: Stainless Steel Monsoon Sample Flow Rate: 200 ml/min QA/QC: MS/MSD

COMMENTS:

LOW FLOW GROUNDWATER SAMPLING DATA SHEET

PROJECT NAME: PCB GW Quality Assessment PROJECT NUMBER: 21562156.00001 FIELD PERSONNEL: M. Corbett, S. Moore
 DATE: 2/27/09 WEATHER: overcast, 38°
 MONITORING WELL ID: PMAMW02M SAMPLE ID: PMAMW02M-0209, PMAMW02M-0209-AD

INITIAL DATA

Well Diameter: 2 in Water Column Height (do not include LNAPL or DNAPL): 45.18 ft btoc Volume of Flow Through Cell: 1,150 mL
 Measured Well Depth (btoc): 61.54 ft If Depth to Top of Screen is > Depth to Water AND Screen Length is < 4 feet, Minimum Purge Volume =
 Constructed Well Depth (btoc): 61.54 ft Place Pump at: Total Well Depth - 0.5 (Screen Length + DNAPL Column Height) = 59.04 ft btoc (3 x Flow Through Cell Volume) 3,450 mL
 Depth to Water (btoc): 16.36 ft If Depth to Top of Screen is < Depth to Water AND Water Column Height and Screen Length are < 4ft, Ambient PID/FID Reading: 0.0 ppm
 Depth to LNAPL/DNAPL (btoc): — ft Place Pump at: Total Well Depth - (0.5 X Water Column Height + DNAPL Column Height) = — ft btoc Wellbore PID/FID Reading: 0.0 ppm
 Depth to Top of Screen (btoc): 56.54 ft If Screen Length and/or water column height is < 4 ft, Place Pump at: Total Well Depth - 2 ft = — ft btoc
 Screen Length: 5 ft

PURGE DATA

Pump Type: Stainless Steel Monsoon

Purge Volume (mL)	Time	Depth to Water (ft)	Color	Odor	±0.2 units	Temp (°C)	±3 %	Turbidity (NTUs)	±10 % or ±2 mg/L	±20 mV
					pH		Cond. (ms/cm)		DO (mg/l)	ORP (mv)
0	1250	16.48	colorless	hydrocarbon	7.17	15.15	1.870	8.8	6.28	-68.4
1200	1256	↓	↓	↓	7.13	14.49	2.026	9.3	6.08	-114.5
2400	1302	↓	↓	↓	7.11	14.56	2.051	8.6	8.20	-145.4
3600	1308	↓	↓	↓	7.13	14.60	2.059	5.4	8.49	-157.8
4800	1314	↓	↓	↓	7.14	14.70	2.067	1.1	10.88	-158.6
6000	1320	↓	↓	↓	7.14	14.70	2.068	0.5	11.25	-161.9
7200	1326	↓	↓	↓	7.13	14.68	2.069	0.7	11.11	-166.3

Start Time: 1250 Elapsed Time: 36 min. Water Quality Meter ID: YSI 6920
 Stop Time: 1326 Average Purge Rate (mL/min): 200 Date Calibrated: 2/27/09

SAMPLING DATA

Sample Date: 2/27/09 Sample Time: 1330 Analysis: Total PCBs
 Sample Method: Stainless Steel Monsoon Sample Flow Rate: 200 mL/min QA/QC: Analytical duplicate

COMMENTS:

LOW FLOW GROUNDWATER SAMPLING DATA SHEET

PROJECT NAME: PCB GW Quality Assessment PROJECT NUMBER: 21562156.00001 FIELD PERSONNEL: M. Corbett, S. Moore
 DATE: 2/27/09 WEATHER: overcast, 38°
 MONITORING WELL ID: PMAMW02S SAMPLE ID: PMAMW02S-0209, PMAMW02S-0209-EB

INITIAL DATA

Well Diameter: 2 in Water Column Height (do not include LNAPL or DNAPL): 11.18 ft btoc Volume of Flow Through Cell): 1,150 mL
 Measured Well Depth (btoc): 27.33 ft If Depth to Top of Screen is > Depth to Water AND Screen Length is < 4 feet, Minimum Purge Volume =
 Constructed Well Depth (btoc): 27.33 ft Place Pump at: Total Well Depth - 0.5 (Screen Length + DNAPL Column Height) = 24.83 ft btoc (3 x Flow Through Cell Volume) 3,450 mL
 Depth to Water (btoc): 16.10 ft If Depth to Top of Screen is < Depth to Water AND Water Column Height and Screen Length are < 4ft, Ambient PID/FID Reading: 0.0 ppm
 Depth to LNAPL/DNAPL (btoc): — ft Place Pump at: Total Well Depth - (0.5 X Water Column Height + DNAPL Column Height) = — ft btoc Wellbore PID/FID Reading: 0.0 ppm
 Depth to Top of Screen (btoc): 22.33 ft If Screen Length and/or water column height is < 4 ft, Place Pump at: Total Well Depth - 2 ft = — ft btoc
 Screen Length: 5 ft

PURGE DATA

Pump Type: Stainless Steel Monsoon

Purge Volume (mL)	Time	Depth to Water (ft)	Color	Odor	±0.2 units	Temp (°C)	±3 %	Turbidity (NTUs)	±10 % or ±2 mg/L	±20 mV
					pH		Cond. (ms/cm)		DO (mg/l)	ORP (mv)
0	1200	16.10	colorless	none	6.97	15.53	1.310	6.3	7.78	-29.6
1200	1206	↓	↓	↓	6.83	15.58	1.321	2.8	8.55	-21.1
2400	1212	↓	↓	↓	6.81	15.79	1.321	1.1	8.81	-15.1
3600	1218	↓	↓	↓	6.79	15.97	1.321	0.0	9.00	-8.5
4800	1224	↓	↓	↓	6.78	15.99	1.324	-0.8	8.68	-3.0

Start Time: 1200 Elapsed Time: 24 min. Water Quality Meter ID: YSI 6920
 Stop Time: 1224 Average Purge Rate (mL/min): 200 Date Calibrated: 2/27/09

SAMPLING DATA

Sample Date: 2/27/09 Sample Time: 1230 Analysis: Total PCBs
 Sample Method: Stainless Steel Monsoon Sample Flow Rate: 200 mL/min. QA/QC: EB collected before this well

COMMENTS:

LOW FLOW GROUNDWATER SAMPLING DATA SHEET

PROJECT NAME: PCB GW Quality Assessment PROJECT NUMBER: 21562156.0001 FIELD PERSONNEL: M. Corbett, S. Moore
 DATE: 3/3/09 WEATHER: partly cloudy, 39°
 MONITORING WELL ID: PMAMW03M SAMPLE ID: PMAMW03M-0209

INITIAL DATA

Well Diameter: 2 in Water Column Height (do not include LNAPL or DNAPL): 45.41 ft btoc Volume of Flow Through Cell: 1,150 mL
 Measured Well Depth (btoc): 61.81 ft If Depth to Top of Screen is > Depth to Water AND Screen Length is < 4 feet, Minimum Purge Volume =
 Constructed Well Depth (btoc): 61.81 ft Place Pump at: Total Well Depth - 0.5 (Screen Length + DNAPL Column Height) = 59.31 ft btoc (3 x Flow Through Cell Volume) 3,450 mL
 Depth to Water (btoc): 16.40 ft If Depth to Top of Screen is < Depth to Water AND Water Column Height and Screen Length are < 4ft, Ambient PID/FID Reading: 0.0 ppm
 Depth to LNAPL/DNAPL (btoc): — ft Place Pump at: Total Well Depth - (0.5 X Water Column Height + DNAPL Column Height) = — ft btoc Wellbore PID/FID Reading: 0.0 ppm
 Depth to Top of Screen (btoc): 56.81 ft If Screen Length and/or water column height is < 4 ft, Place Pump at: Total Well Depth - 2 ft = — ft btoc
 Screen Length: 5 ft

PURGE DATA

Pump Type: Stainless Steel Monsoon

Purge Volume (mL)	Time	Depth to Water (ft)	Color	Odor	±0.2 units	±3 %	±10 % or ±2 mg/L	±20 mV		
					pH	Temp (°C)	Cond. (ms/cm)	Turbidity (NTUs)	DO (mg/l)	ORP (mv)
0	1410	16.40	brown	hydrocarbon	9.07	15.30	2.317	114.7	3.88	-91.2
1200	1416	↓	↓	↓	9.12	15.43	2.310	100.6	7.32	-109.3
2400	1422	↓	↓	↓	9.12	15.51	2.313	75.7	8.66	-130.2
3600	1428	↓	↓	↓	9.24	15.30	2.315	48.3	8.07	-146.9
4800	1434	↓	↓	↓	9.26	15.30	2.316	30.7	7.39	-154.0
6000	1440	↓	↓	↓	9.24	15.37	2.317	23.0	7.79	-158.0

Start Time: 1410 Elapsed Time: 30 min. Water Quality Meter ID: YSI 6920
 Stop Time: 1440 Average Purge Rate (mL/min): 200 Date Calibrated: 3/3/09

SAMPLING DATA

Sample Date: 3/3/09 Sample Time: 1445 Analysis: Total PCBs
 Sample Method: Stainless Steel Monsoon Sample Flow Rate: 200 mL/min. Date Calibrated: NA

COMMENTS:

LOW FLOW GROUNDWATER SAMPLING DATA SHEET

PROJECT NAME: PCB GW Quality Assessment PROJECT NUMBER: 21562156.00001 FIELD PERSONNEL: M. Corbett, S. Moore
 DATE: 3/3/09 WEATHER: overcast, 39°
 MONITORING WELL ID: PMAMW03S SAMPLE ID: PMAMW03S-0209

INITIAL DATA

Well Diameter: 2 in
 Measured Well Depth (btoc): 27.35 ft
 Constructed Well Depth (btoc): 27.40 ft
 Depth to Water (btoc): 16.28 ft
 Depth to LNAPL/DNAPL (btoc): — ft
 Depth to Top of Screen (btoc): 22.40 ft
 Screen Length: 5 ft

Water Column Height (do not include LNAPL or DNAPL): 11.02 ft btoc
 If Depth to Top of Screen is > Depth to Water AND Screen Length is < 4 feet,
 Place Pump at: Total Well Depth - 0.5 (Screen Length + DNAPL Column Height) = 24.90 ft btoc
 If Depth to Top of Screen is < Depth to Water AND Water Column Height and Screen Length are < 4ft,
 Place Pump at: Total Well Depth - (0.5 X Water Column Height + DNAPL Column Height) = — ft btoc
 If Screen Length and/or water column height is < 4 ft, Place Pump at: Total Well Depth - 2 ft = — ft btoc

Volume of Flow Through Cell): 1,150 mL
 Minimum Purge Volume =
 (3 x Flow Through Cell Volume) 3,450 mL
 Ambient PID/FID Reading: 0.0 ppm
 Wellbore PID/FID Reading: 0.1 ppm

PURGE DATA

Pump Type: Stainless Steel Monsoon

Purge Volume (mL)	Time	Depth to Water (ft)	Color	Odor	±0.2 units	±3 %	±10 % or ±2 mg/L	±20 mV		
					pH	Temp (°C)	Cond. (ms/cm)	Turbidity (NTUs)	DO (mg/l)	ORP (mv)
0	1320	16.44	colorless	hydrocarbon	6.90	15.65	1.888	-3.0	4.24	51.7
1200	1326	↓	↓	↓	6.91	15.67	1.899	-4.2	4.30	45.8
2400	1332	↓	↓	↓	6.83	15.83	1.912	-5.9	7.54	41.2
3600	1338	↓	↓	↓	6.84	15.74	1.913	-6.2	8.10	38.1
4800	1344	↓	↓	↓	6.82	15.66	1.917	-6.7	8.52	36.7
6000	1350	✓	✓	✓	6.81	15.53	1.916	-6.9	8.22	36.2

Start Time: 1320 Elapsed Time: 30 min. Water Quality Meter ID: YSI 6920
 Stop Time: 1350 Average Purge Rate (mL/min): 200 Date Calibrated: 3/3/09

SAMPLING DATA

Sample Date: 3/3/09 Sample Time: 1345 - 1355 Analysis: Total PCBs
 Sample Method: Stainless Steel Monsoon Sample Flow Rate: 200 mL/min. Date Calibrated: NA

COMMENTS:

LOW FLOW GROUNDWATER SAMPLING DATA SHEET

PROJECT NAME: W&K PCB GW Assesment PROJECT NUMBER: 21562156.0001 FIELD PERSONNEL: M. Corbett, S. Moore
 DATE: 3/3/09 WEATHER: cloudy, 35°
 MONITORING WELL ID: PMAMW04D SAMPLE ID: PMAMW04D-0209

INITIAL DATA

Well Diameter: 2 in Water Column Height (do not include LNAPL or DNAPL): _____ ft btoc Volume of Flow Through Cell: 500^{mc} mL
 Total Well Depth (btoc): 73.45 ft If Depth to Top of Screen is > Depth to Water AND Screen Length is < 4 feet, Minimum Purge Volume = _____ mL
 Depth to Water (btoc): 14.90 ft Place Pump at: Total Well Depth - 0.5 (Screen Length + DNAPL Column Height) = _____ ft btoc (3 x Flow Through Cell Volume) 1500^{mc} mL
 Depth to LNAPL/DNAPL (btoc): — ft If Depth to Top of Screen is < Depth to Water AND Water Column Height and Screen Length are < 4ft, Ambient PID/FID Reading: 0.0 ppm
 Depth to Top of Screen (btoc): _____ ft Place Pump at: Total Well Depth - (0.5 X Water Column Height + DNAPL Column Height) = _____ ft btoc Wellbore PID/FID Reading: 0.0 ppm
 Screen Length: 5 ft If Screen Length and/or water column height is < 4 ft, Place Pump at: Total Well Depth - 2 ft = _____ ft btoc

PURGE DATA

Pump Type: Stainless Steel Monsoon

Purge Volume (mL)	Time	Depth to Water (ft)	Color	Odor	pH	Temp (°C)	Cond. (ms/cm)	Turbidity (NTUs)	DO (mg/l)	ORP (mv)
<u>0</u>	<u>1530</u>	<u>14.90</u>	<u>light gray</u>	<u>hydrocarbon</u>	<u>6.66</u>	<u>15.30</u>	<u>1.750</u>	<u>83.8</u>	<u>11.77</u>	<u>-116.2</u>
<u>1200</u>	<u>1536</u>	<u>↓</u>	<u>↓</u>	<u>↓</u>	<u>6.59</u>	<u>15.28</u>	<u>1.747</u>	<u>42.6</u>	<u>12.86</u>	<u>-121.7</u>
<u>2400</u>	<u>1542</u>	<u>↓</u>	<u>colorless</u>	<u>↓</u>	<u>6.65</u>	<u>15.07</u>	<u>1.739</u>	<u>19.6</u>	<u>13.38</u>	<u>-122.2</u>
<u>3600</u>	<u>1548</u>	<u>↓</u>	<u>↓</u>	<u>↓</u>	<u>6.61</u>	<u>15.18</u>	<u>1.738</u>	<u>18.0</u>	<u>12.47</u>	<u>-122.5</u>
<u>4800</u>	<u>1554</u>	<u>↓</u>	<u>↓</u>	<u>↓</u>	<u>6.63</u>	<u>15.08</u>	<u>1.735</u>	<u>12.7</u>	<u>12.61</u>	<u>-126.4</u>

Start Time: 1530 Elapsed Time: 24 min. Water Quality Meter ID: 6920
 Stop Time: 1554 Average Purge Rate (mL/min): 200 Date Calibrated: 3/3/09
 YSI 555 and Lamotte 2020^{mc}

SAMPLING DATA

Sample Date: 3/3/09 Sample Time: 1600 Analysis: Total PCBs
 Sample Method: Stainless Steel Monsoon Sample Flow Rate: 200 mL/min. Date Calibrated: NA

COMMENTS:

LOW FLOW GROUNDWATER SAMPLING DATA SHEET

PROJECT NAME: PCB GW Quality Assessment PROJECT NUMBER: 21562156.00001 FIELD PERSONNEL: M. Corbett, S. Moore
 DATE: 3/3/09 WEATHER: sun/clouds, 35°
 MONITORING WELL ID: PMAMW04S SAMPLE ID: PMAMW04S-0209-M PMAMW04S-0209-DNAPL

INITIAL DATA

Well Diameter: 2 in
 Measured Well Depth (btoc): 25.38 ft
 Constructed Well Depth (btoc): 25.38 ft
 Depth to Water (btoc): 15.33 ft
 Depth to LNAPL/DNAPL (btoc): 24.98 ft
 Depth to Top of Screen (btoc): 20.38 ft
 Screen Length: 5 ft

Water Column Height (do not include LNAPL or DNAPL): 10.05 ft btoc
 If Depth to Top of Screen is > Depth to Water AND Screen Length is < 4 feet,
 Place Pump at: Total Well Depth - 0.5 (Screen Length + DNAPL Column Height) = _____ ft btoc
 If Depth to Top of Screen is < Depth to Water AND Water Column Height and Screen Length are < 4ft,
 Place Pump at: Total Well Depth - (0.5 X Water Column Height + DNAPL Column Height) = _____ ft btoc
 If Screen Length and/or water column height is < 4 ft, Place Pump at: Total Well Depth - 2 ft = _____ ft btoc

Volume of Flow Through Cell): _____ mL
 Minimum Purge Volume = _____ mL
 (3 x Flow Through Cell Volume)
 Ambient PID/FID Reading: 0.0 ppm
 Wellbore PID/FID Reading: 4.1 ppm

PURGE DATA

Pump Type: Stainless Steel Monsoon

Purge Volume (mL)	Time	Depth to Water (ft)	Color	Odor	±0.2 units	±3 %	±10 % or ±2 mg/L	±20 mV
					pH	Temp (°C)	Cond. (ms/cm)	Turbidity (NTUs)

Start Time: _____ Elapsed Time: _____ Water Quality Meter ID: YSI 6920
 Stop Time: _____ Average Purge Rate (mL/min): _____ Date Calibrated: _____

SAMPLING DATA

Sample Date: 3/3/09 Sample Time: 1545 Analysis: Total PCBs
 Sample Method: Stainless Steel Monsoon Sample Flow Rate: _____ Date Calibrated: NA

COMMENTS:

DNAPL sampled for Total PCBs (680)

LOW FLOW GROUNDWATER SAMPLING DATA SHEET

PROJECT NAME: PCB GW Quality Assessment PROJECT NUMBER: 21562156.00001 FIELD PERSONNEL: M. Corbett, S. Moore
 DATE: 2/27/09 WEATHER: overcast, 39°
 MONITORING WELL ID: PMAMW05M SAMPLE ID: PMAMW05-0209 PMAMW05M-0209

INITIAL DATA

Well Diameter: 2 in
 Measured Well Depth (btoc): 57.02 ft
 Constructed Well Depth (btoc): 57.17 ft
 Depth to Water (btoc): 15.58 ft
 Depth to LNAPL/DNAPL (btoc): — ft
 Depth to Top of Screen (btoc): 52.17 ft
 Screen Length: 5 ft

Water Column Height (do not include LNAPL or DNAPL): 41.59 ft btoc
 If Depth to Top of Screen is > Depth to Water AND Screen Length is < 4 feet,
 Place Pump at: Total Well Depth - 0.5 (Screen Length + DNAPL Column Height) = 54.67 ft btoc
 If Depth to Top of Screen is < Depth to Water AND Water Column Height and Screen Length are < 4ft,
 Place Pump at: Total Well Depth - (0.5 X Water Column Height + DNAPL Column Height) = — ft btoc
 If Screen Length and/or water column height is < 4 ft, Place Pump at: Total Well Depth - 2 ft = — ft btoc

Volume of Flow Through Cell): 1,150 mL
 Minimum Purge Volume =
 (3 x Flow Through Cell Volume) 3,450 mL
 Ambient PID/FID Reading: 0.0 ppm
 Wellbore PID/FID Reading: 1.3 ppm

PURGE DATA

Pump Type: Stainless Steel Monsoon

Purge Volume (mL)	Time	Depth to Water (ft)	Color	Odor	±0.2 units	±3%	±10% or ±2 mg/L	±20 mV		
					pH	Temp (°C)	Cond. (ms/cm)	Turbidity (NTUs)	DO (mg/l)	ORP (mv)
0	1525	15.58			7.20	16.77	1.937	43.4	4.98	-91.7
1200	1531	↓	gray	hydrocarbon	7.15	16.91	2.232	30.2	5.04	-100.0
2400	1537	↓	colorless	↓	7.13	15.25	2.263	12.2	5.46	-103.0
3600	1543	↓	↓	↓	7.14	15.16	2.258	6.6	6.73	-108.9
4800	1549	↓	↓	↓	7.14	14.86	2.258	2.1	6.71	-114.1
6000	1555	↓	↓	↓	7.13	14.78	2.257	3.4	7.09	-118.0

Start Time: 1525 Elapsed Time: 30 min. Water Quality Meter ID: YSI 6920
 Stop Time: 1555 Average Purge Rate (mL/min): 200 Date Calibrated: 2/27/09

SAMPLING DATA

Sample Date: 2/27/09 Sample Time: 1600 Analysis: Total PCBs
 Sample Method: Stainless Steel Monsoon Sample Flow Rate: 200 mL/min Date Calibrated: NA

COMMENTS:

LOW FLOW GROUNDWATER SAMPLING DATA SHEET

PROJECT NAME: PCB GW Quality Assessment PROJECT NUMBER: 21562156.00001 FIELD PERSONNEL: M. Corbett, S. Moore
 DATE: 2/27/09 WEATHER: overcast, 90°
 MONITORING WELL ID: PMAMW06D SAMPLE ID: PMAMW06-0209 PMAMW06D-0209

INITIAL DATA

Well Diameter: 2 in Water Column Height (do not include LNAPL or DNAPL): 88.79 ft btoc Volume of Flow Through Cell: 6,150 mL
 Measured Well Depth (btoc): 101.29 ft If Depth to Top of Screen is > Depth to Water AND Screen Length is < 4 feet, Minimum Purge Volume =
 Constructed Well Depth (btoc): 101.29 ft Place Pump at: Total Well Depth - 0.5 (Screen Length + DNAPL Column Height) = 98.79 ft btoc (3 x Flow Through Cell Volume) 3,450 mL
 Depth to Water (btoc): 12.50 ft If Depth to Top of Screen is < Depth to Water AND Water Column Height and Screen Length are < 4ft, Ambient PID/FID Reading: 0.0 ppm
 Depth to LNAPL/DNAPL (btoc): — ft Place Pump at: Total Well Depth - (0.5 X Water Column Height + DNAPL Column Height) = — ft btoc Wellbore PID/FID Reading: 1.1 ppm
 Depth to Top of Screen (btoc): 96.29 ft If Screen Length and/or water column height is < 4 ft, Place Pump at: Total Well Depth - 2 ft = — ft btoc
 Screen Length: 5 ft

PURGE DATA

Pump Type: Stainless Steel Monsoon

Purge Volume (mL)	Time	Depth to Water (ft)	Color	Odor	±0.2 units	±3%	±10% or ±2 mg/L	±20 mV		
					pH	Temp (°C)	Cond. (ms/cm)	Turbidity (NTUs)	DO (mg/l)	ORP (mv)
<u>0</u>	<u>1430</u>	<u>12.51</u>	<u>colorless</u>	<u>hydrocarbon</u>	<u>6.90</u>	<u>16.23</u>	<u>1.080</u>	<u>11.1</u>	<u>7.97</u>	<u>-110.1</u>
<u>1200</u>	<u>1436</u>	↓	↓	↓	<u>6.94</u>	<u>16.00</u>	<u>1.083</u>	<u>2.3</u>	<u>8.65</u>	<u>-130.7</u>
<u>2400</u>	<u>1442</u>	↓	↓	↓	<u>6.90</u>	<u>15.99</u>	<u>1.093</u>	<u>0.1</u>	<u>8.80</u>	<u>-138.9</u>
<u>3600</u>	<u>1448</u>	↓	↓	↓	<u>6.90</u>	<u>16.04</u>	<u>1.105</u>	<u>-0.8</u>	<u>9.06</u>	<u>-145.5</u>
<u>4200</u>	<u>1454</u>	↓	↓	↓	<u>6.90</u>	<u>15.99</u>	<u>1.110</u>	<u>-1.3</u>	<u>9.26</u>	<u>-148.7</u>

Start Time: 1430 Elapsed Time: 24 min. Water Quality Meter ID: YSI 6920
 Stop Time: 1454 Average Purge Rate (mL/min): 200 Date Calibrated: 2/27/09

SAMPLING DATA

Sample Date: 2/27/09 Sample Time: 1500 Analysis: Total PCBs
 Sample Method: Stainless Steel Monsoon Sample Flow Rate: 200 mL/min Date Calibrated: NA

COMMENTS:

Appendix B
Chains-of-Custody

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

TestAmerica Savannah
5102 LaRoche Avenue
Savannah, GA 31404

Website: www.testamericainc.com
Phone: (912) 354-7858
Fax: (912) 352-0165

Alternate Laboratory Name/Location

Phone:
Fax:

PROJECT REFERENCE IGK PCB GW Quality	PROJECT NO. 21562156	PROJECT LOCATION (STATE) IL	MATRIX TYPE	REQUIRED ANALYSIS	PAGE 1	OF 1
LAB PROJECT MANAGER Idya Gulizia	P.O. NUMBER	CONTRACT NO.	COMPOSITE (C) OR GRAB (G) INDICATE AQUEOUS (WATER) SOLID OR SEMISOLID AIR NONAQUEOUS LIQUID (OIL, SOLVENT, ...) (680 PCBs Total)	PRESERVATIVE	STANDARD REPORT DELIVERY <input type="checkbox"/>	DATE DUE _____
CLIENT (SITE) PM Adams	CLIENT PHONE 314-429-0100	CLIENT FAX 314-429-0462			EXPEDITED REPORT DELIVERY (SURCHARGE) <input type="checkbox"/>	DATE DUE _____
CLIENT NAME URS Corporation	CLIENT E-MAIL thomas.adams@urscorp.com				NUMBER OF COOLERS SUBMITTED PER SHIPMENT: 3	
CLIENT ADDRESS 01 Highlands Plaza Dr. West Ste. 300 St. Louis MO 63110	COMPANY CONTRACTING THIS WORK (if applicable) olutia					

SAMPLE		SAMPLE IDENTIFICATION	COMPOSITE (C) OR GRAB (G) INDICATE	AQUEOUS (WATER)	SOLID OR SEMISOLID	AIR	NONAQUEOUS LIQUID (OIL, SOLVENT, ...)	NUMBER OF CONTAINERS SUBMITTED				REMARKS
DATE	TIME							1	2	3	4	
21/09	1025	PMAMW015-0209 ✓	GX					2				
21 OF 29	1025	PMAMW015-0209-MS	GX					2				
	1025	PMAMW015-0209-MSD	GX					2				
	1130	PMAMW01M-0209 ✓	GX					2				
	1145	PMAMW02M ^S -0209-EB sm 2/27/09 ✓	GX					2				
	1230	PMAMW02S-0209 ✓	GX					2				
	1330	PMAMW02M-0209 ✓	GX					2				
	1330	PMAMW02M-0209-AD ✓	GX					2				
	1500	PMAMW06D-0209 ✓	GX					2				
✓	1600	PMAMW05M-0209 ✓	GX					2				

SM 2/27/09

RELINQUISHED BY (SIGNATURE) <i>[Signature]</i>	DATE 2/27/09	TIME 1700	RELINQUISHED BY (SIGNATURE)	DATE	TIME	RELINQUISHED BY (SIGNATURE)	DATE	TIME
RECEIVED BY (SIGNATURE)	DATE	TIME	RECEIVED BY (SIGNATURE)	DATE	TIME	RECEIVED BY (SIGNATURE)	DATE	TIME

RECEIVED FOR LABORATORY BY (SIGNATURE) <i>[Signature]</i>	DATE 02/28/09	TIME 1020	CUSTODY INTACT YES <input type="checkbox"/> NO <input type="checkbox"/>	CUSTODY SEAL NO.	SAVANNAH LOG NO. 67045096	LABORATORY REMARKS 1.0/2.8/2.4
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TEMP

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

TestAmerica Savannah
5102 LaRoche Avenue
Savannah, GA 31404

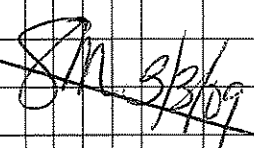
Website: www.testamericainc.com
Phone: (912) 354-7858
Fax: (912) 352-0165

Alternate Laboratory Name/Location

Phone:
Fax:

PROJECT REFERENCE Wgk PCB	PROJECT NO. 21562156.0000 1	PROJECT LOCATION (STATE) IL	MATRIX TYPE	REQUIRED ANALYSIS										PAGE 1	OF 1
TAL (LAB) PROJECT MANAGER Lidya Gulizia	P.O. NUMBER	CONTRACT NO.	COMPOSITE (C) OR GRAB (G) INDICATE AQUEOUS (WATER) SOLID OR SEMISOLID AIR NONAQUEOUS LIQUID (OIL, SOLVENT, ...)	1 Total PCB (680)										STANDARD REPORT DELIVERY <input type="radio"/>	
CLIENT (SITE) PM Thomas Adams	CLIENT PHONE 314-429-0100	CLIENT FAX 314-429-0462												DATE DUE _____	
CLIENT NAME URS Corporation	CLIENT E-MAIL thomas_adams@ursecorp.com													EXPEDITED REPORT DELIVERY (SURCHARGE) <input type="radio"/>	
CLIENT ADDRESS 1001 Highlands Plaza Dr. W. Ste 300 St. Louis, MO 63110	COMPANY CONTRACTING THIS WORK (if applicable) Solutia													DATE DUE _____	

PRESERVATIVE

SAMPLE		SAMPLE IDENTIFICATION	COMPOSITE (C) OR GRAB (G) INDICATE	AQUEOUS (WATER)	SOLID OR SEMISOLID	AIR	NONAQUEOUS LIQUID (OIL, SOLVENT, ...)	NUMBER OF CONTAINERS SUBMITTED										REMARKS
DATE	TIME																	
3/3/09	1355	PMAMW03S-0209	GX				2											
↓	1445	PMAMW03M-0209	GX				2											
↓	1600	PMAMW04D-0209	GX				2											
																		

RELINQUISHED BY: (SIGNATURE) Shemp Moore	DATE 3/3/09	TIME 1700	RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME
RECEIVED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME

LABORATORY USE ONLY							
RECEIVED FOR LABORATORY BY: (SIGNATURE) kh	DATE 3/4/09	TIME 0902	CUSTODY INTACT YES <input type="radio"/> NO <input type="radio"/>	CUSTODY SEAL NO.	SAVANNAH LOG NO. 680-45176	LABORATORY REMARKS 2.4	

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

TestAmerica Savannah
5102 LaRoche Avenue
Savannah, GA 31404

Website: www.testamericainc.com
Phone: (912) 354-7858
Fax: (912) 352-0165

Alternate Laboratory Name/Location

Phone:
Fax:

PROJECT REFERENCE JGK PCB	PROJECT NO. 21562156.0001	PROJECT LOCATION (STATE) IL	MATRIX TYPE	REQUIRED ANALYSIS						PAGE 1 OF 1	
CLIENT (LAB) PROJECT MANAGER Idya Gulizia	P.O. NUMBER	CONTRACT NO.	COMPOSITE (C) OR GRAB (G) INDICATE AQUEOUS (WATER) SOLID OR SEMISOLID AIR NONAQUEOUS LIQUID (OIL, SOLVENT, ...) none Total PCB (680)	PRESERVATIVE							STANDARD REPORT DELIVERY <input type="radio"/>
CLIENT (SITE) PM Thomas Adams	CLIENT PHONE 314 429-0100	CLIENT FAX 314 429-0462									DATE DUE _____
CLIENT NAME URS Corporation	CLIENT E-MAIL thomas.adams@urscorp.com										EXPEDITED REPORT DELIVERY (SURCHARGE) <input type="radio"/>
CLIENT ADDRESS 001 Highlands Plaza W Ste 300 St. Louis MO 63110	COMPANY CONTRACTING THIS WORK (if applicable) Solutia										DATE DUE _____

SAMPLE		SAMPLE IDENTIFICATION	MATRIX TYPE	CONTAINERS	REMARKS
DATE	TIME				
3/10/09	1545	PMAMW04S-0209-DNAPL ✓	GX	X 1	
<i>SR 3/3/09</i>					

RELINQUISHED BY: (SIGNATURE) <i>Sherry Mason</i>	DATE 3/3/09	TIME 1700	RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME
RECEIVED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME

LABORATORY USE ONLY

RECEIVED FOR LABORATORY BY: (SIGNATURE) KL	DATE 3/4/09	TIME 1018	CUSTODY INTACT YES <input type="radio"/> NO <input type="radio"/>	CUSTODY SEAL NO.	SAVANNAH LOG NO. 680-45199	LABORATORY REMARKS 3.8°C
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Appendix C
Quality Assurance Report

QUALITY ASSURANCE REPORT

Solutia Inc.
W.G. Krummrich Facility
Sauget, Illinois

PCB Groundwater Quality
Assessment
1st Quarter 2009 Data Report

Prepared for

Solutia Inc.
575 Maryville Centre Drive
St. Louis, MO 63141

May 2009



URS Corporation
1001 Highland Plaza Drive West, Suite 300
St. Louis, MO 63110
(314) 429-0100
Project # 21562156.00001

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US EPA ARCHIVE DOCUMENT

1.0 INTRODUCTION

This Quality Assurance Report presents the findings of a review of analytical data for groundwater samples collected in February and March of 2009 at the Solutia W.G. Krummrich plant as part of the 1st Quarter 2009 PCB Groundwater Quality Assessment Program. The samples were collected by URS Corporation personnel and analyzed by TestAmerica Laboratories located in Savannah, Georgia using USEPA methodologies. Samples were analyzed for polychlorinated biphenyls (PCBs).

One hundred percent of the data were subjected to a data quality review (Level III validation). The Level III validations were performed in order to confirm that the analytical data provided by TestAmerica were acceptable in quality for their intended use.

A total of 14 samples (nine investigative groundwater samples, one DNAPL, one field duplicate, one matrix spike and matrix spike duplicate (MS/MSD) pair, and one equipment blank) were analyzed by Test America. These samples were analyzed as part of Sample Delivery Groups (SDGs) KPM028 and KPM029, utilizing the following USEPA Methods:

- Method 680 for PCBs

Samples were reviewed following procedures outlined in the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review, October 1999, and the PCB Groundwater Quality Assessment Work Plan, (Solutia 2008).

The above guidelines provided the criteria to review the data. Additional quantitative criteria are given in the analytical methods. Data was qualified based on the data quality review. Qualifiers assigned indicates data that did not meet acceptance criteria and for which corrective actions were not successful or not performed. The various qualifiers are explained in **Tables 1** and **2** below.

TABLE 1 Laboratory Data Qualifiers

Lab Qualifier	Definition
U	Analyte was not detected at or above the reporting limit.
*	LCS, LCSD, MS, MSD, MD or surrogate exceeds the control limits.
E	Result exceeded the calibration range, secondary dilution required.
D	Surrogate or matrix spike recoveries were not obtained because the extract was diluted for analysis; also compounds analyzed at a dilution will be flagged with a D.
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.
N	MS, MSD: Spike recovery exceeds upper or lower control limits.
H	Sample was prepped or analyzed beyond the specified holding time.
B	Compound was found in the blank and sample.
4	MS, MSD: The analyte present in the original sample is 4 times greater than the matrix spike concentration; therefore, control limits are not applicable.

TABLE 2 URS Data Qualifiers

URS Qualifier	Definition
U	The analyte was analyzed for but was not detected.
J	The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.
UJ	The analyte was not detected above the reported sample quantitation limit. However, the reported quantitation limit is approximate and may or may not represent the actual limit of quantitation necessary to accurately and precisely measure the analyte in the sample.
R	The sample results are rejected due to serious deficiencies in the ability to analyze the sample and meet quality control criteria. The presence or absence of the analyte cannot be verified.

Based on the criteria outlined, it is recommended that the results reported for these analyses are accepted for their intended use. Acceptable levels of accuracy, precision, and representativeness (based on MS/MSD, LCS, surrogate compounds and field duplicate results) were achieved for this data set, except where noted in this report. In addition, analytical completeness, defined to be the percentage of analytical results which are judged to be valid, including estimated detect (J) values was 100 percent, which meets the completeness goal of 95 percent.

The data review included evaluation of the following criteria:

Organics

- Receipt condition and sample holding times
- Laboratory method blanks, and field equipment blank samples
- Surrogate spike recoveries
- Laboratory control sample (LCS) recoveries
- Matrix Spike/Matrix Spike Duplicate (MS/MSD) sample recoveries and Relative Percent Difference (RPD) values
- Field duplicate results
- Results reported from dilutions
- Internal standard responses

2.0 RECEIPT CONDITION AND SAMPLE HOLDING TIMES

Sample holding time requirements for the analyses performed are presented in the methods and/or in the data review guidelines. Review of the sample collection, extraction and analysis dates involved comparing the chain-of-custody and the laboratory data summary forms for accuracy, consistency, and holding time compliance. Upon review of the data, the cooler receipt form indicated that no problems were encountered by the laboratory.

Extractions and/or analyses were completed within the recommended holding time requirements; no qualification of data was required.

3.0 LABORATORY METHOD BLANK AND EQUIPMENT BLANK SAMPLES

Laboratory method blank samples evaluate the existence and magnitude of contamination problems resulting from laboratory activities. All laboratory method blank samples were analyzed at the method prescribed frequencies. No analytes were detected in the method blanks.

Equipment blank samples are used to assess the effectiveness of equipment decontamination procedures. All analytes were not detected in the equipment blank samples.

4.0 SURROGATE SPIKE RECOVERIES

Surrogate compounds are used to evaluate overall laboratory performance for sample preparation efficiency on a per sample basis. All samples analyzed for PCBs were spiked with surrogate compounds during sample preparation. USEPA National Functional Guidelines for Organic Data Review state how data is qualified, if surrogate spike recoveries do not meet evaluation criteria. Surrogate recoveries were within evaluation criteria with the exception of those surrogates in data reviews discussed further in **Appendix D**. No qualifications of data were required due to surrogate recoveries.

5.0 LABORATORY CONTROL SAMPLE RECOVERIES

Laboratory control samples (LCS) are analyzed with each analytical batch to assess the accuracy of the analytical process. All LCS recoveries were within evaluation criteria. No qualification of data was required due to LCS recoveries.

6.0 MATRIX SPIKE/MATRIX SPIKE DUPLICATE (MS/MSD) SAMPLES

MS/MSD samples are analyzed to assess the accuracy and precision of the analytical process on an analytical sample in a particular matrix. MS/MSD samples were required to be collected at a frequency of one per 20 investigative samples in accordance with the work plan. URS Corporation submitted one MS/MSD sample set for nine investigative samples, meeting the work plan frequency requirement.

No qualifications were made to the data if the MS/MSD percent recoveries were zero due to dilutions or if the percent RPD was the only factor outside of criteria. Also, USEPA National Functional Guidelines for Organic Data Review (October 1999) states that organic data should not be qualified based on MS/MSD criteria alone. Therefore, if recoveries were outside evaluation criteria due to matrix interference or abundance of analytes, no qualifiers were assigned unless these analytes had other quality control criteria outside evaluation criteria.

Sample PMAMW01S-0209 was spiked and analyzed for PCBs in SDG KPM028. All MS/MSD recoveries were within evaluation criteria. No qualification of data was required due to MS/MSD recoveries.

7.0 FIELD DUPLICATE RESULTS

Field duplicate results are used to evaluate precision of the entire data collection activity, including sampling, analysis and site heterogeneity. When results for both duplicate and sample values are greater than five times the practical quantitation limit (PQL), satisfactory precision is indicated by an RPD less than or equal to 25 percent for aqueous samples. Where one or both of the results of a field duplicate pair are reported at less than five times the PQL, satisfactory precision is indicated if the field duplicate results agree within 2 times the quantitation limit. Field duplicate results that do not meet these criteria may indicate unsatisfactory precision of the results.

One field duplicate sample was collected for the nine investigative samples. This satisfies the requirement in the work plan (one per 10 investigative samples or 10 percent). Field duplicate RPDs were within evaluation criteria with the exception of the RPD in data reviews discussed further in **Appendix D**. Qualifications due to field duplicate RPDs are listed in the table below.

SDG	Field ID	Field Duplicate ID	Parameter	Analyte	RPD	Qualification
KPM028	PMAMW02M-0209	PMAMW02M-0209-AD	PCBs	Monochloro-biphenyl	37	J

8.0 INTERNAL STANDARD RESPONSES

Internal standard (IS) performance criteria ensure that the GC/MS sensitivity and response are stable during each analytical run. For the PCBs (Method 680), the IS areas must be within +/- 30 percent of the preceding calibration verification (CV) IS value. Also, the IS retention times must be within 30 seconds of the preceding IS CV retention time. If the IS area count is outside criteria, Method 680 indicates the mean IS area obtained during the initial calibration (ICAL) (+/- 50 percent) should be used.

The internal standards area responses for PCBs were verified for the data reviews. IS responses met the criteria as described above, with the exception of the IS responses in the data reviews discussed further in **Appendix D**. No qualifications of data were required due to internal standard responses.

9.0 RESULTS REPORTED FROM DILUTIONS

The PCB DNAPL sample was diluted and reanalyzed due to the high levels of PCBs in the sample. The diluted sample results for PCBs were reported at the lowest possible reporting limit.

Appendix D
Groundwater Analytical Results
(with Data Review Sheets)

SDG KPM028

Results of Samples from Wells:

PMAMW01S
PMAMW01M
PMAMW02S
PMAMW02M
PMAMW03S
PMAMW03M
PMAMW04D
PMAMW05M
PMAMW06D

Solutia Krummrich Data Review

Laboratory SDG: KPM028

Reviewer: Elizabeth Kunkel

Date Reviewed: 4/6/2009

Guidance: USEPA National Functional Guidelines for Organic Data Review 1999.

Applicable Work Plan: PCB Groundwater Quality Assessment (Solutia 2008)

Sample Identification #	Sample Identification #
PMAMW01S-0209	PMAMW01M-0209
PMAMW02S-0209-EB	PMAMW02S-0209
PMAMW02M-0209	PMAMW02M-0209-AD
PMAMW06D-0209	PMAMW05-0209
PMAMW03S-0209	PMAMW03M-0209
PSMW04D-0209	

1.0 Data Package Completeness

Were all items delivered as specified in the QAPP and COC?

Yes

2.0 Laboratory Case Narrative \ Cooler Receipt Form

Were problems noted in the laboratory case narrative or cooler receipt form?

Although not indicated in the laboratory case narrative, one internal standard recovery was outside evaluation criteria. In addition, samples were qualified due to a field duplicate RPD outside of evaluation criteria. These issues are addressed further in the appropriate sections below.

The cooler receipt form did not indicate any problems.

3.0 Holding Times

Were samples extracted/analyzed within QAPP limits?

Yes

4.0 Blank Contamination

Were any analytes detected in the Method Blanks, Field Blanks or Trip Blanks?

No

5.0 Laboratory Control Sample

Were LCS recoveries within evaluation criteria?

Yes

6.0 Surrogate Recoveries

Were surrogate recoveries within evaluation criteria?

Yes

7.0 Matrix Spike and Matrix Spike Duplicate Recoveries

Were MS/MSD samples reported as part of this SDG?

Yes, sample PMAMW01S-0209 was spiked and analyzed for PCBs.

Were MS/MSD recoveries within evaluation criteria?

Yes

8.0 Internal Standard (IS) Recoveries

Were internal standard area recoveries within evaluation criteria?

No

Field ID	Parameter	Analyte	IS Area Recovery	IS Criteria
PMAMW03M-0209	PCBs	Phenanthrene-d ₁₀	287508	129844-241138

Analytical data that required qualification based on IS data are included in the table above. Analytical data which were reported as nondetect and associated with internal standard recoveries above evaluation criteria, indicating a possible high bias, did not require qualification.

Internal standard areas for phenanthrene-d₁₀ recovered within the initial calibration average internal standard area, therefore; no qualification of data was required.

9.0 Laboratory Duplicate Results

Were laboratory duplicate samples collected as part of this SDG?

No

Were laboratory duplicate sample RPDs within criteria?

N/A

10.0 Field Duplicate Results

Were field duplicate samples collected as part of this SDG?

Yes

Field ID	Field Duplicate ID
PMAMW02M-0209	PMAMW02M-0209-AD

Were field duplicates within evaluation criteria?

No

Field ID	Field Duplicate ID	Parameter	Analyte	RPD	Qualification
PMAMW02M-0209	PMAMW02M-0209-AD	PCBs	Monochloro-biphenyl	37	J

11.0 Sample Dilutions

For samples that were diluted and nondetect, were undiluted results also reported?

Samples were not analyzed at a dilution.

12.0 Additional Qualifications

Were additional qualifications applied?

No

SAMPLE SUMMARY

Client: Solutia Inc.

Job Number: 680-45096-1
Sdg Number: KPM028

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
680-45096-1	PMAMW01S-0209 ✓	Water	02/27/2009 1025	02/28/2009 1020
680-45096-1MS	PMAMW01S-0209	Water	02/27/2009 1025	02/28/2009 1020
680-45096-1MSD	PMAMW01S-0209	Water	02/27/2009 1025	02/28/2009 1020
680-45096-2	PMAMW01M-0209 ✓	Water	02/27/2009 1130	02/28/2009 1020
680-45096-3EB	PMAMW02S-0209-EB ✓	Water	02/27/2009 1145	02/28/2009 1020
680-45096-4	PMAMW02S-0209 ✓	Water	02/27/2009 1230	02/28/2009 1020
680-45096-5	PMAMW02M-0209 ✓	Water	02/27/2009 1330	02/28/2009 1020
680-45096-6FD	PMAMW02M-0209-AD ✓	Water	02/27/2009 1330	02/28/2009 1020
680-45096-7	PMAMW06D-0209 ✓	Water	02/27/2009 1500	02/28/2009 1020
680-45096-8	PMAMW05M-0209 ✓	Water	02/27/2009 1600	02/28/2009 1020
680-45176-1	PMAMW03S-0209 ✓	Water	03/03/2009 1355	03/04/2009 0902
680-45176-2	PMAMW03M-0209 ✓	Water	03/03/2009 1445	03/04/2009 0902
680-45176-3	PMAMW04D-0209 ✓	Water	03/03/2009 1600	03/04/2009 0902



SAMPLE RESULTS

Analytical Data

Client: Solutia Inc.

Job Number: 680-45096-1

Sdg Number: KPM028

Client Sample ID: PMAMW01S-0209

Lab Sample ID: 680-45096-1

Date Sampled: 02/27/2009 1025

Client Matrix: Water

Date Received: 02/28/2009 1020

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method:	680	Analysis Batch:	680-133546	Instrument ID:	GC/MS SemiVolatiles - Y
Preparation:	680	Prep Batch:	680-131612	Lab File ID:	N/A
Dilution:	1.0			Initial Weight/Volume:	1030 mL
Date Analyzed:	03/17/2009 1107			Final Weight/Volume:	1 mL
Date Prepared:	03/03/2009 1213 ✓			Injection Volume:	

Analyte	Result (ug/L)	Qualifier	RL
Monochlorobiphenyl	0.097	U	0.097
Dichlorobiphenyl	0.097	U	0.097
Trichlorobiphenyl	0.097	U	0.097
Tetrachlorobiphenyl	0.19	U	0.19
Pentachlorobiphenyl	0.19	U	0.19
Hexachlorobiphenyl	0.19	U	0.19
Heptachlorobiphenyl	0.29	U	0.29
Octachlorobiphenyl	0.29	U	0.29
Nonachlorobiphenyl	0.49	U	0.49
DCB Decachlorobiphenyl	0.49	U	0.49

Surrogate	%Rec	Acceptance Limits
Decachlorobiphenyl-13C12	90 ✓	25 - 113

Analytical Data

Client: Solutia Inc.

Job Number: 680-45096-1

Sdg Number: KPM028

Client Sample ID: PMAMW01M-0209

Lab Sample ID: 680-45096-2

Date Sampled: 02/27/2009 1130

Client Matrix: Water

Date Received: 02/28/2009 1020

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method: 680	Analysis Batch: 680-133546	Instrument ID: GC/MS SemiVolatiles - Y
Preparation: 680	Prep Batch: 680-131612	Lab File ID: N/A
Dilution: 1.0		Initial Weight/Volume: 1020 mL
Date Analyzed: 03/26/2009 1347		Final Weight/Volume: 1 mL
Date Prepared: 03/03/2009 1213 ✓		Injection Volume:

Analyte	Result (ug/L)	Qualifier	RL
Monochlorobiphenyl	0.16		0.098
Dichlorobiphenyl	0.098	U	0.098
Trichlorobiphenyl	0.098	U	0.098
Tetrachlorobiphenyl	0.20	U	0.20
Pentachlorobiphenyl	0.20	U	0.20
Hexachlorobiphenyl	0.20	U	0.20
Heptachlorobiphenyl	0.29	U	0.29
Octachlorobiphenyl	0.29	U	0.29
Nonachlorobiphenyl	0.49	U	0.49
DCB Decachlorobiphenyl	0.49	U	0.49
Surrogate	%Rec		Acceptance Limits
Decachlorobiphenyl-13C12	44 ✓		25 - 113

Analytical Data

Client: Solutia Inc.

Job Number: 680-45096-1
Sdg Number: KPM028

Client Sample ID: **PMAMW02S-0209-EB**

Lab Sample ID: 680-45096-3EB
Client Matrix: Water

Date Sampled: 02/27/2009 1145
Date Received: 02/28/2009 1020

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method:	680	Analysis Batch: 680-133546	Instrument ID:	GC/MS SemiVolatiles - Y
Preparation:	680	Prep Batch: 680-131612	Lab File ID:	N/A
Dilution:	1.0		Initial Weight/Volume:	1030 mL
Date Analyzed:	03/17/2009 1208		Final Weight/Volume:	1 mL
Date Prepared:	03/03/2009 1213 ✓		Injection Volume:	

Analyte	Result (ug/L)	Qualifier	RL
Monochlorobiphenyl	0.097	U	0.097
Dichlorobiphenyl	0.097	U	0.097
Trichlorobiphenyl	0.097	U	0.097
Tetrachlorobiphenyl	0.19	U	0.19
Pentachlorobiphenyl	0.19	U	0.19
Hexachlorobiphenyl	0.19	U	0.19
Heptachlorobiphenyl	0.29	U	0.29
Octachlorobiphenyl	0.29	U	0.29
Nonachlorobiphenyl	0.49	U	0.49
DCB Decachlorobiphenyl	0.49	U	0.49

Surrogate	%Rec	Acceptance Limits
Decachlorobiphenyl-13C12	79 ✓	25 - 113



Analytical Data

Client: Solutia Inc.

Job Number: 680-45096-1

Sdg Number: KPM028

Client Sample ID: PMAMW02S-0209

Lab Sample ID: 680-45096-4

Date Sampled: 02/27/2009 1230

Client Matrix: Water

Date Received: 02/28/2009 1020

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method:	680	Analysis Batch: 680-133546	Instrument ID:	GC/MS SemiVolatiles - Y
Preparation:	680	Prep Batch: 680-131612	Lab File ID:	N/A
Dilution:	1.0		Initial Weight/Volume:	1030 mL
Date Analyzed:	03/25/2009 1150		Final Weight/Volume:	1 mL
Date Prepared:	03/03/2009 1213 ✓		Injection Volume:	

Analyte	Result (ug/L)	Qualifier	RL
Monochlorobiphenyl	0.097	U	0.097
Dichlorobiphenyl	0.097	U	0.097
Trichlorobiphenyl	0.097	U	0.097
Tetrachlorobiphenyl	0.19	U	0.19
Pentachlorobiphenyl	0.19	U	0.19
Hexachlorobiphenyl	0.19	U	0.19
Heptachlorobiphenyl	0.29	U	0.29
Octachlorobiphenyl	0.29	U	0.29
Nonachlorobiphenyl	0.49	U	0.49
DCB Decachlorobiphenyl	0.49	U	0.49

Surrogate	%Rec	Acceptance Limits
Decachlorobiphenyl-13C12	65 ✓	25 - 113

Analytical Data

Client: Solutia Inc.

Job Number: 680-45096-1

Sdg Number: KPM028

Client Sample ID: **PMAMW02M-0209**

Lab Sample ID: 680-45096-5

Date Sampled: 02/27/2009 1330

Client Matrix: Water

Date Received: 02/28/2009 1020

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method: 680

Analysis Batch: 680-133546

Instrument ID: GC/MS SemiVolatiles - Y

Preparation: 680

Prep Batch: 680-131612

Lab File ID: N/A

Dilution: 1.0

Initial Weight/Volume: 1000 mL

Date Analyzed: 03/25/2009 1222

Final Weight/Volume: 1 mL

Date Prepared: 03/03/2009 1213 ✓

Injection Volume:

Analyte	Result (ug/L)	Qualifier	RL
Monochlorobiphenyl	2.9	U	0.10
Dichlorobiphenyl	0.10	U	0.10
Trichlorobiphenyl	0.10	U	0.10
Tetrachlorobiphenyl	0.20	U	0.20
Pentachlorobiphenyl	0.20	U	0.20
Hexachlorobiphenyl	0.20	U	0.20
Heptachlorobiphenyl	0.30	U	0.30
Octachlorobiphenyl	0.30	U	0.30
Nonachlorobiphenyl	0.50	U	0.50
DCB Decachlorobiphenyl	0.50	U	0.50

Surrogate	%Rec	Acceptance Limits
Decachlorobiphenyl-13C12	64 ✓	25 - 113

Analytical Data

Client: Solutia Inc.

Job Number: 680-45096-1

Sdg Number: KPM028

Client Sample ID: PMAMW02M-0209-AD

Lab Sample ID: 680-45096-6FD

Date Sampled: 02/27/2009 1330

Client Matrix: Water

Date Received: 02/28/2009 1020

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method: 680

Analysis Batch: 680-133546

Instrument ID: GC/MS SemiVolatiles - Y

Preparation: 680

Prep Batch: 680-131612

Lab File ID: N/A

Dilution: 1.0

Initial Weight/Volume: 1000 mL

Date Analyzed: 03/26/2009 1621 ✓

Final Weight/Volume: 1 mL

Date Prepared: 03/03/2009 1213 ✓

Injection Volume:

Analyte	Result (ug/L)	Qualifier	RL
Monochlorobiphenyl	2.0	J	0.10
Dichlorobiphenyl	0.10	U	0.10
Trichlorobiphenyl	0.10	U	0.10
Tetrachlorobiphenyl	0.20	U	0.20
Pentachlorobiphenyl	0.20	U	0.20
Hexachlorobiphenyl	0.20	U	0.20
Heptachlorobiphenyl	0.30	U	0.30
Octachlorobiphenyl	0.30	U	0.30
Nonachlorobiphenyl	0.50	U	0.50
DCB Decachlorobiphenyl	0.50	U	0.50

Surrogate	%Rec	Acceptance Limits
Decachlorobiphenyl-13C12	86 ✓	25 - 113

Analytical Data

Client: Solutia Inc.

Job Number: 680-45096-1
Sdg Number: KPM028

Client Sample ID: PMAMW06D-0209

Lab Sample ID: 680-45096-7
Client Matrix: Water

Date Sampled: 02/27/2009 1500
Date Received: 02/28/2009 1020

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method:	680	Analysis Batch:	680-133546	Instrument ID:	GC/MS SemiVolatiles - Y
Preparation:	680	Prep Batch:	680-131612	Lab File ID:	N/A
Dilution:	1.0			Initial Weight/Volume:	1020 mL
Date Analyzed:	03/26/2009 1316			Final Weight/Volume:	1 mL
Date Prepared:	03/03/2009 1213			Injection Volume:	

Analyte	Result (ug/L)	Qualifier	RL
Monochlorobiphenyl	0.32		0.098
Dichlorobiphenyl	0.098	U	0.098
Trichlorobiphenyl	0.098	U	0.098
Tetrachlorobiphenyl	0.20	U	0.20
Pentachlorobiphenyl	0.20	U	0.20
Hexachlorobiphenyl	0.20	U	0.20
Heptachlorobiphenyl	0.29	U	0.29
Octachlorobiphenyl	0.29	U	0.29
Nonachlorobiphenyl	0.49	U	0.49
DCB Decachlorobiphenyl	0.49	U	0.49
Surrogate	%Rec		Acceptance Limits
Decachlorobiphenyl-13C12	74		25 - 113

Analytical Data

Client: Solutia Inc.

Job Number: 680-45096-1

Sdg Number: KPM028

Client Sample ID: PMAMW05M-0209

Lab Sample ID: 680-45096-8

Date Sampled: 02/27/2009 1600

Client Matrix: Water

Date Received: 02/28/2009 1020

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method: 680

Analysis Batch: 680-133546

Instrument ID: GC/MS SemiVolatiles - Y

Preparation: 680

Prep Batch: 680-131612

Lab File ID: N/A

Dilution: 1.0

Initial Weight/Volume: 1020 mL

Date Analyzed: 03/17/2009 1441

Final Weight/Volume: 1 mL

Date Prepared: 03/03/2009 1213 ✓

Injection Volume:

Analyte	Result (ug/L)	Qualifier	RL
Monochlorobiphenyl	0.098	U	0.098
Dichlorobiphenyl	0.098	U	0.098
Trichlorobiphenyl	0.098	U	0.098
Tetrachlorobiphenyl	0.20	U	0.20
Pentachlorobiphenyl	0.20	U	0.20
Hexachlorobiphenyl	0.20	U	0.20
Heptachlorobiphenyl	0.29	U	0.29
Octachlorobiphenyl	0.29	U	0.29
Nonachlorobiphenyl	0.49	U	0.49
DCB Decachlorobiphenyl	0.49	U	0.49
<hr/>			
Surrogate	%Rec		Acceptance Limits
Decachlorobiphenyl-13C12	75 ✓		25 - 113

Analytical Data

Client: Solutia Inc.

Job Number: 680-45096-1

Sdg Number: KPM028

Client Sample ID: PMAMW03S-0209

Lab Sample ID: 680-45176-1

Date Sampled: 03/03/2009 1355

Client Matrix: Water

Date Received: 03/04/2009 0902

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method: 680

Analysis Batch: 680-133209

Instrument ID: No Equipment Assigned to

Preparation: 680

Prep Batch: 680-132174

Lab File ID: N/A

Dilution: 1.0

Initial Weight/Volume: 1030 mL

Date Analyzed: 03/19/2009 0835

Final Weight/Volume: 1 mL

Date Prepared: 03/10/2009 1335 ✓

Injection Volume:

Analyte	Result (ug/L)	Qualifier	RL
Monochlorobiphenyl	0.67		0.097
Dichlorobiphenyl	0.12		0.097
Trichlorobiphenyl	0.097	U	0.097
Tetrachlorobiphenyl	0.19	U	0.19
Pentachlorobiphenyl	0.19	U	0.19
Hexachlorobiphenyl	0.19	U	0.19
Heptachlorobiphenyl	0.29	U	0.29
Octachlorobiphenyl	0.29	U	0.29
Nonachlorobiphenyl	0.49	U	0.49
DCB Decachlorobiphenyl	0.49	U	0.49
Surrogate	%Rec		Acceptance Limits
Decachlorobiphenyl-13C12	76 ✓		25 - 113

Analytical Data

Client: Solutia Inc.

Job Number: 680-45096-1

Sdg Number: KPM028

Client Sample ID: PMAMW03M-0209

Lab Sample ID: 680-45176-2

Date Sampled: 03/03/2009 1445

Client Matrix: Water

Date Received: 03/04/2009 0902

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method: 680

Analysis Batch: 680-133209

Instrument ID: No Equipment Assigned to

Preparation: 680

Prep Batch: 680-132174

Lab File ID: N/A

Dilution: 1.0

Initial Weight/Volume: 1030 mL

Date Analyzed: 03/19/2009 0906 ✓

Final Weight/Volume: 1 mL

Date Prepared: 03/10/2009 1335 ✓

Injection Volume:

Analyte	Result (ug/L)	Qualifier	RL
Monochlorobiphenyl	1.4		0.097
Dichlorobiphenyl	0.097	U	0.097
Trichlorobiphenyl	0.097	U	0.097
Tetrachlorobiphenyl	0.19	U	0.19
Pentachlorobiphenyl	0.19	U	0.19
Hexachlorobiphenyl	0.19	U	0.19
Heptachlorobiphenyl	0.29	U	0.29
Octachlorobiphenyl	0.29	U	0.29
Nonachlorobiphenyl	0.49	U	0.49
DCB Decachlorobiphenyl	0.49	U	0.49

Surrogate	%Rec	Acceptance Limits
Decachlorobiphenyl-13C12	60 ✓	25 - 113

Analytical Data

Client: Solutia Inc.

Job Number: 680-45096-1
Sdg Number: KPM028

Client Sample ID: PMAMW04D-0209

Lab Sample ID: 680-45176-3
Client Matrix: Water

Date Sampled: 03/03/2009 1600
Date Received: 03/04/2009 0902

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method: 680	Analysis Batch: 680-133209	Instrument ID: No Equipment Assigned to
Preparation: 680	Prep Batch: 680-132174	Lab File ID: N/A
Dilution: 1.0		Initial Weight/Volume: 1030 mL
Date Analyzed: 03/19/2009 0937		Final Weight/Volume: 1 mL
Date Prepared: 03/10/2009 1335 ✓		Injection Volume:

Analyte	Result (ug/L)	Qualifier	RL
Monochlorobiphenyl	0.20		0.097
Dichlorobiphenyl	0.21		0.097
Trichlorobiphenyl	0.11		0.097
Tetrachlorobiphenyl	0.54		0.19
Pentachlorobiphenyl	0.38		0.19
Hexachlorobiphenyl	0.79		0.19
Heptachlorobiphenyl	0.50		0.29
Octachlorobiphenyl	0.29	U	0.29
Nonachlorobiphenyl	0.49	U	0.49
DCB Decachlorobiphenyl	0.49	U	0.49

Surrogate	%Rec	Acceptance Limits
Decachlorobiphenyl-13C12	71 ✓	25 - 113



DATA REPORTING QUALIFIERS

Client: Solutia Inc.

Job Number: 680-45096-1

Sdg Number: KPM028

Lab Section	Qualifier	Description
GC/MS Semi VOA	U	Indicates the analyte was analyzed for but not detected.

SDG KPM029

Results of Sample from Well:

PMAMW04S

Solutia Krummrich Data Review

Laboratory SDG: KPM029

Reviewer: Elizabeth Kunkel

Date Reviewed: 4/6/2009

Guidance: USEPA National Functional Guidelines for Organic Data Review 1999.

Applicable Work Plan: PCB Groundwater Quality Assessment (Solutia 2008)

Sample Identification #
PMAMW04S-0209-DNAPL

1.0 Data Package Completeness

Were all items delivered as specified in the QAPP and COC?

Yes

2.0 Laboratory Case Narrative \ Cooler Receipt Form

Were problems noted in the laboratory case narrative or cooler receipt form?

Yes, the laboratory case narrative indicated that surrogates were diluted out and not recovered in sample PMAMW04S-0209-DNAPL. Sample PMAMW04S-0209-DNAPL was diluted due to a high level of target analytes. The internal standard recovery for phenanthrene-d₁₀ was outside evaluation criteria. These issues are addressed further in the appropriate sections below.

The cooler receipt form did not indicate any problems.

3.0 Holding Times

Were samples extracted/analyzed within QAPP limits?

Yes

4.0 Blank Contamination

Were any analytes detected in the Method Blanks, Field Blanks or Trip Blanks?

No

5.0 Laboratory Control Sample

Were LCS recoveries within evaluation criteria?

Yes

6.0 Surrogate Recoveries

Were surrogate recoveries within evaluation criteria?

No, surrogates were diluted out and not recovered in sample PMAMW04S-0209-DNAPL. No qualification of data was required.

7.0 Matrix Spike and Matrix Spike Duplicate Recoveries

Were MS/MSD samples reported as part of this SDG?

No

Were MS/MSD recoveries within evaluation criteria?

N/A

8.0 Internal Standard (IS) Recoveries

Were internal standard area recoveries within evaluation criteria?

No

Field ID	Parameter	Analyte	IS Area Recovery	IS Criteria
PMAMW04S-0209-DNAPL	PCBs	Phenanthrene-d ₁₀	274859	129844-241138

Analytical data that required qualification based on IS data are included in the table above. Analytical data which were reported as nondetect and associated with internal standard recoveries above evaluation criteria, indicating a possible high bias, did not require qualification.

Internal standard areas for phenanthrene-d₁₀ recovered within the initial calibration average internal standard area, therefore; no qualification of data was required.

9.0 Laboratory Duplicate Results

Were laboratory duplicate samples collected as part of this SDG?

No

Were laboratory duplicate sample RPDs within criteria?

N/A

10.0 Field Duplicate Results

Were field duplicate samples collected as part of this SDG?

No

11.0 Sample Dilutions

For samples that were diluted and nondetect, were undiluted results also reported?

Analytes were detected in samples that were diluted.

12.0 Additional Qualifications

Were additional qualifications applied?

No

SAMPLE SUMMARY

Client: Solutia Inc.

Job Number: 680-45199-1
Sdg Number: KPM029

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
680-45199-1	PMAMW04S-0209-DNAPL	Waste	03/03/2009 1545	03/04/2009 1018

SAMPLE RESULTS

Analytical Data

Client: Solutia Inc.

Job Number: 680-45199-1

Sdg Number: KPM029

Client Sample ID: PMAMW04S-0209-DNAPL

Lab Sample ID: 680-45199-1

Date Sampled: 03/03/2009 1545

Client Matrix: Waste

Date Received: 03/04/2009 1018

680 Polychlorinated Biphenyls (PCBs) (GC/MS)

Method:	680	Analysis Batch:	680-132480	Instrument ID:	GC/MS SemiVolatiles - Y
Preparation:	680	Prep Batch:	680-132032	Lab File ID:	N/A
Dilution:	200			Initial Weight/Volume:	1.00 g
Date Analyzed:	03/19/2009 0558			Final Weight/Volume:	10 mL
Date Prepared:	03/08/2009 0616			Injection Volume:	

Analyte	DryWt Corrected: N	Result (ug/Kg)	Qualifier	RL
Monochlorobiphenyl		200000	U	200000
Dichlorobiphenyl		3400000		200000
Trichlorobiphenyl		20000000		200000
Tetrachlorobiphenyl		51000000		400000
Pentachlorobiphenyl		36000000		400000
Hexachlorobiphenyl		62000000		400000
Heptachlorobiphenyl		42000000		600000
Octachlorobiphenyl		10000000		600000
Nonachlorobiphenyl		1000000	U	1000000
DCB Decachlorobiphenyl		1000000	U	1000000
Surrogate		%Rec		Acceptance Limits
Decachlorobiphenyl-13C12		0	D	30 - 130

DATA REPORTING QUALIFIERS

Client: Solutia Inc.

Job Number: 680-45199-1

Sdg Number: KPM029

Lab Section	Qualifier	Description
GC/MS Semi VOA	U	Indicates the analyte was analyzed for but not detected.
	D	Surrogate or matrix spike recoveries were not obtained because the extract was diluted for analysis; also compounds analyzed at a dilution may be flagged with a D.