UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

October 14, 2008

LU-9J

REPLY TO THE ATTENTION OF:

Vic Stirnaman
Executive Vice President
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Groundwater Monitoring Letter Report
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Stirnaman

After re-evaluating your June 2008 revised response and the monitoring wells data from the April 29, 2008 monitoring event, the U.S. Environmental Protection Agency is in agreement with Keystone Steel & Wire's conclusion that detected lead concentrations at the F-Pond monitoring wells, did not exceed the Illinois EPA's Tier 1 Groundwater Remediation Objective of 7.5 ppb for Class 1 groundwater. You may submit a revised Corrective Measures Completion Report.

If you have any questions, please contact me at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Land and Chemicals Division
Corrective Action Section 2

Cc: Chad Erdmann, KS&W
Cc: Jim Moore, IEPA

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June 30, 2008

Mr. Jonathan Adenuga
U.S. EPA Region 5 DE-9J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

Re: Completion of the Corrective Measures Activities
at the Keystone Steel & Wire Company
7000 SW Adams Street, Peoria, Illinois
EPA ID No. ILD 000 714 881

Dear Mr. Adenuga:

On behalf of Keystone Consolidated Industries, Inc d/b/a Keystone Steel & Wire Company (Keystone), ENTACT, LLC thanks you for the United States Environmental Protection Agency's (U.S. EPA's) May 22, 2008 letter. We are in agreement with the conclusion regarding the groundwater monitoring data from the Class 2 groundwater FP-1 monitoring well. With this agreement regarding the groundwater monitoring results for the F-pond, Keystone considers the groundwater monitoring activities complete for the F-Pond and the North Ditch Staging Area. The Class 2 groundwater monitoring wells will be closed and abandoned pursuant to the Illinois Water Well Construction Code, Title 77 Illinois Administrative Code Section 920.120.

In an effort to complete the remaining RCRA Corrective Action requirements at the site, Keystone is resubmitting a response to U.S. EPA's September 26, 2006 comments regarding the *Corrective Measures Completion Report* dated July 31, 2006 and Addenda. The original response was dated October 26, 2006. The revised response will include an evaluation of the additional 2 years of groundwater monitoring conducted at the site and the conclusion reached from the groundwater data (refer to Attachment 1 for the revised response document). A revised Corrective Measures Completion Report will be submitted to U.S. EPA for approval upon acceptance of the attached revised responses to U.S. EPA's September 26, 2006 comments.

In addition, we would like to inform the U.S. EPA that the Environmental Land Use Controls (ELUC) for the F-Pond and North Ditch Staging Area have been filed with the city/county and submitted to the Illinois Environmental Protection Agency's Bureau of Land. We believe, with the approval of the revised Corrective Measures Completion Report, that this will complete the RCRA corrective measure requirements for this site and would like a designation of RCRA Corrective Action Complete with Controls from U.S. EPA.

If you have any questions, or concerns regarding this submittal, please contact me at (972) 580-1323 or Chad Erdmann with Keystone at (309) 697-7165.

Respectfully,

Thad Slaughter
ENTACT LLC

cc: Chad Erdmann, Keystone Steel & Wire
Jim Moore, IEPA

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www.entact.com

ATTACHMENT 1

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June 30, 2008

Mr. Jonathan Adenuga
U.S. EPA Region 5, DE-9J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

RE: Corrective Measures Completion Report
Keystone Steel & Wire Company
7000 SW Adams Street, Peoria, Illinois
EPA ID No. ILD 000 714 881

Dear Jonathan:

On behalf of the Keystone Consolidated Industries, Inc d/b/a Keystone Steel & Wire Company (Keystone), ENTACT Services LLC (ENTACT) is re-transmitting the attached revised responses to the U.S. Environmental Protection Agency's (U.S. EPA) comments dated September 26, 2006 regarding Keystone's *Corrective Measures Completion Report* dated July 31, 2006. The responses to U.S. EPA comment numbers 6 and 11 were revised to include the groundwater monitoring data collected from the F-Pond and North Ditch Staging Area since the original submittal.

For reviewing convenience, the U.S. EPA's comments are provided, followed by ENTACT's corresponding response in italicized type. A revision to the *Corrective Measures Completion Report* will be submitted to the U.S. EPA for approval upon acceptance of the attached responses to U.S. EPA's comments.

If you have any questions or concerns regarding this submittal, please feel free to contact me at (972) 580-1323 or Chad Erdmann with Keystone at (309) 697-7165.

Respectfully,

Thad Slaughter
ENTACT Services LLC

cc: Chad Erdmann, Keystone Steel & Wire Company
Jim Moore, IEPA
George Hamper, USEPA
Andrew Running, Kirkland & Ellis
Pierce Marshall, on behalf of Keystone Steel & Wire Co.
Kevin Lombardozzi, on behalf of Keystone Steel & Wire Co.
Russ Perry, on behalf of Keystone Steel & Wire Co.
Bert Downing, Keystone Consolidated Industries, Inc.

ENTACT's Responses to the U.S. EPA Comments Dated September 26, 2006 Regarding the Corrective Measures Completion Report (CMCR) and the CMCR Addenda for the Keystone Steel & Wire Company Facility in Peoria, Illinois

I. GENERAL COMMENTS ON THE CMCR

U.S. EPA Comment No. 1: The CMCR should include additional figures of the F-Pond and NDSA. Figures showing the grid layouts, confirmatory sampling locations, and reported exceedance locations in each area should be added to the CMCR figures section. Figures 1 and 2 from the Field Sampling Plan in the Corrective Measures Implementation (CMI) Workplan should be used as the basis for construction of these figures. It is also recommended that the figures provided in Appendix D be moved to the main body of the report for easier reference.

ENTACT Response: An additional figure of the NDSA that depicts the grid locations, excavation limits and post-excavation confirmation sample locations and the results for the initial and final excavation has been added to the figures section of the CMCR (refer to the response to Comment no. 5). There are no exceedances of the remediation goals in either the NDSA or F-Pond after the completion of the corrective measures, thus additional figures that would depict this have not been provided as requested. The drawings provided in Appendix D of the CMCR have been added to the figures section and the appendices have been renumbered to reflect the removal of the drawings from Appendix D.

U.S. EPA Comment No. 2: Tables provided in the CMCR routinely omit the data qualifier "J', which is used to indicate that data have been estimated. Data qualifiers are typically included in these types of tables because they provide an indication of data reliability and confirmation that the data have been validated. Revise the tables accordingly to include all appropriate qualifiers.

ENTACT Response: The tables in the CMCR have been revised to reflect this Comment.

II. SPECIFIC COMMENTS ON THE CMCR

<u>Section 2.2.5, F-Pond Excavation</u>

U.S. EPA Comment No. 3: While Section 2.2.5 indicates that Paint Filter Liquids Test results are provided in Appendix B, it is recommended that a brief statement be added to the text that indicates whether stabilization efforts were successful. Revise the text in Section 2.2.5 accordingly.

ENTACT Response: Section 2.2.5 of the CMCR has been revised to reflect this Comment.

U.S. EPA Comment No. 4: The first sentence of this section lists the F-Pond grids from which impacted soil and sediment was excavated during the CMI. Grid 14 (with a reported lead level of 9,500 milligrams per kilogram (mg/kg)) has not been included. A review of Table 2, however, indicates that post-excavation samples were collected from Grid 14. Based on this

determination, it appears that Grid 14 was inadvertently omitted from the list of F-Pond excavation grids. Revise the first sentence as appropriate.

ENTACT Response: Section 2.2.5 of the CMCR has been revised to reflect this Comment.

Section 2.3.4, NDSA Excavation

U.S. EPA Comment No. 5: A review of the laboratory reports in Appendix A revealed that a confirmation sample was collected from the south sidewall of Grid A4 (sample ECS-ND-A4-SWS-001-2') from laboratory report number PDC 6021467). Furthermore, the lead concentration measured in this confirmation sample (1,100 mg/kg) exceeded the remediation goal of 800 mg/kg. These data were not provided in Table 2, apparently because this sample was not a formal sampling point from the CMI Workplan. Nevertheless, the exceedance was reported and should be included with the remaining data. Because no follow-up confirmation sampling data were found in the laboratory reports and no additional discussion is provided, it is unclear whether additional excavation was completed and impacted soil was successfully removed from Grid A4. Revise the report to clarify the status of this exceedance area. Furthermore, the CMCR should be revised to discuss the implications of this detection as it pertains to achieving overall remediation goals at the NDSA (e.g., could other exceedance areas be present at the NDSA, was the sampling program sufficiently representative and widespread to identify all exceedance areas, is Keystone confident that remediation goals have been met across the entire NDSA, what is the justification for that determination, should additional excavation have been performed, have the corrective measures been implemented appropriately).

ENTACT Response: The initial area of excavation in the NDSA consisted of the two areas depicted on Figure 2 of the Field Sampling Plan included in the CMI Workplan, Revision 2.0 and the space in between these areas to a depth of 1 foot below ground surface (bgs) for access purposes. At the completion of initial excavation, post-excavation confirmation samples, including sample ECS-ND-A4-SWS-001-2', were collected from the general locations depicted on this figure. The results of these post-excavation confirmation samples indicated that the remediation goals had not been achieved at all sample locations. Thus, additional excavation, where necessary in the horizontal and vertical directions, was performed and is referred to as the final excavation for the purposes of this response. This final excavation included the excavation of soils located in the space between the two excavation areas to a depth of 3 feet bgs. Because the previously sampled sidewall, represented by sample ID ECS-ND-A4-SWS-001-2', was no longer present after the completion of the final excavation, a post-excavation confirmation sample of the bottom of the excavation in the location of the previous sidewall was collected and was labeled as sample ID ECS-ND-A3-SWS-002-3'. A figure has been included in the figures section of the revised CMCR that depicts the boundaries of the initial and final excavations and the associated post-excavation confirmation sample locations and results for clarification purposes. The final post-excavation confirmation samples indicated that the remediation goals had been achieved at all sample locations.

Section 2.3.7, NDSA Groundwater Monitoring

U.S. EPA Comment No. 6: According to Section 3.3.8 of the approved CMI Workplan (Revision 2), two new monitoring wells were to be installed north and southwest of the NDSA footprint. A review of CMCR Figure 3 indicates that well NDSA-1 was installed in the appropriate approximate location, but new well NDSA-2 was installed within and on the western edge of the footprint of the NDSA, rather than north of the area. Concern over the specific location of this well is further heightened after review of groundwater elevations and the eastward flow direction reported for the NDSA in the CMCR Addendum. With flow moving east, samples collected from well NDSA-2 will largely be indicative of upgradient groundwater quality. Revise the text to justify this discrepancy and its impact on groundwater monitoring of the NDSA. The text should specifically discuss the ability of the existing well network to document potential groundwater quality downgradient of the NDSA. Finally, Figure 3 should be modified to include existing NDSA wells T-6A and W-2.

ENTACT Response: The monitoring wells were installed as close as possible to the footprint of the NDSA in the north and southwest directions per the U.S. EPA's request during CMI Workplan development. Monitoring well NDSA-2 was in fact installed outside of the limits of the NDSA on the north side. It appears that the location of the NDSA in relation to these monitoring wells was incorrectly represented on Figure 3. Thus, this figure has been revised to show the correct location of the NDSA and monitoring wells NDSA-1 and NDSA-2. The figure has also been revised to depict the locations of monitoring wells T-6A and W-2.

Regarding the ability of the well network to document groundwater quality downgradient of the NDSA, the monitoring wells were installed at their locations based on a groundwater gradient map for the facility. This map indicated that the general groundwater flow direction for this portion of the facility was towards the north-northeast.

Additionally, the NDSA is within the limits of the designated Groundwater Management Zone (the "GMZ") being implemented pursuant to an Agreed Order on Consent with the Illinois EPA. Groundwater within this zone is currently extracted from five large pumping wells and treated before discharge. This GMZ was established due to the current extent of groundwater contamination in the area related to the presence of chlorinated organic compounds in the groundwater. The terms "up gradient" and "down gradient" really have little meaning for this unit since the groundwater gradients are artificial and will remain artificial for as long as the GMZ is in existence. Currently the groundwater flow in the area is artificially depressed and groundwater in the GMZ flows radially towards one of the five pumping wells.

Groundwater monitoring at the North Ditch Staging Area was performed for a period of one year. The results were submitted to U.S. EPA for review in several Groundwater Monitoring Letter Reports dated September 8, 2006; February 5, 2007; May 1, 2007; July 13, 2007; and January 14, 2008. Groundwater monitoring associated with the North Ditch Staging Area was discontinued after the August 2007 event based on the demonstration of no impact to groundwater from the North Ditch Staging Area, as determined by total and dissolved lead concentrations that have remained below the Illinois EPA's Tier I Groundwater Remediation Objective of 7.5 ug/l for Class I groundwater during the monitoring period. Based on these

results, we are proposing to plug and abandon the North Ditch Staging Area monitoring wells (NDSA-1 and NDSA-2).

U.S. EPA Comment No. 7: As outlined in Section 3.3.8 of the approved CMI Workplan (Revision 2), groundwater monitoring at the NDSA was to include the two new wells (NDSA-1 and NDSA-2) and existing wells T-6A and W-2. The CMCR text indicates that new wells were sampled on July 13, 2006. The text should be clarified to note that the two existing wells were also sampled.

ENTACT Response: Section 2.3.7 of the CMCR has been revised to reflect this Comment.

Table 1, Characterization Sample Analytical Results

U.S. EPA Comment No. 8: The detection of lead at F-Pond Grid 32 (sample CS-F-32-001-0.5) should also be highlighted as an exceedance because the detected concentration of 900 mg/kg exceeds the remediation goal of 800 mg/kg.

ENTACT Response: Table 1 of the CMCR has been revised to reflect this Comment.

Table 2, Post-Excavation Confirmation Sample Analytical Results

U.S. EPA Comment No. 9: Two minor data errors were identified in Table 2. Revise Table 2 to indicate that the TCLP lead result recorded for the NDSA Grid A5/ND-3 sample location (sample ECS-ND-A5-ND3-001-2') was 0.065 milligrams per liter (mg/l), rather than some value less than this concentration. In addition, the detected lead concentrations in the F-Pond Grid 14 bottom confirmation sample (sample ECS-F-14-01-2) should be listed as 9.1 mg/kg, rather than 9 mg/kg.

ENTACT Response: Table 2 of the CMCR has been revised to reflect this Comment.

Table 4, Common Fill, Topsoil Sample Analytical Results

U.S. EPA Comment No. 10: For accuracy and consistency with lab reports provided in Appendix A, this table should be corrected to show a detection limit of 630 micrograms per kilogram (ug/kg), rather than 500 ug/kg, for gasoline range total petroleum hydrocarbons.

ENTACT Response: Table 4 of the CMCR has been revised to reflect this Comment.

III. GENERAL COMMENTS ON THE CMCR ADDENDUM

U.S. EPA Comment No. 11: As indicated on pages 2 and 3 of the CMCR Addendum, elevated total lead concentrations were reported both upgradient of and sidegradient to the F-Pond. Total lead concentrations of 13 and 11,000 micrograms per liter (ug/l) were reported in upgradient well FP-1 and sidegradient well TL4-R, respectively. Both of these detections exceed the Illinois Environmental Protection Agency (IEPA) Tiered Approach to Corrective Action Objectives (TACO) Tier I Groundwater Remediation objectives (GRO) of 7.5 ug/l for lead in Class I

groundwater, and the concentration at well TL4-R exceeds the TACO Tier I GRO of 100 ug/l for lead in Class II groundwater. Well FP-2, located downgradient of the F-Pond, did not report detectable concentrations of total lead. Keystone should expand the CMCR Addendum to discuss and provide possible explanations for the unexpected analytical results upgradient and sidegradient to the F-Pond. Keystone should specifically consider the possibility of an as yet-unidentified source of lead contamination northeast of the F-Pond. Future monitoring results should be closely evaluated to confirm or dispute this interpretation and give an accurate portrayal of the nature and extent of lead contamination in the vicinity of the F-Pond. If these results and interpreted groundwater flow directions are confirmed during the October 2006 sampling event, additional investigation will likely be required.

As indicated in the May groundwater data, the turbidity (NTU) results range from 14.7 to 5,999 and the July data range from 3 to 175. The U.S. EPA guidance document requires a NTU of 10 for all groundwater samples collected for analysis. KS&W needs to explain the source of lead in the turbid sediments. Provide soil sample results collected from these monitoring wells.

ENTACT Response: Based on U.S. EPA's comment, additional monitoring of the Class II groundwater at the F-Pond was performed in October 2006, January 2007, April 2007, August 2007, October 2007, February 2008, and April 2008. Monitoring well TL4-R was plugged and abandoned in July 2007 due to its discovered location within the limits of the Tail Tracks Landfill. Two additional monitoring wells, the existing monitoring well TL-3 and the newly installed monitoring well FP-3, were added to the F-Pond groundwater monitoring well network in November 2006 and July 2007, respectively, to monitor lead concentrations in groundwater sidegradient to the F-Pond. The results of the groundwater monitoring events were submitted to U.S. EPA for review in several Groundwater Monitoring Letter Reports dated September 8, 2006; February 5, 2007; May 1, 2007; July 13, 2007; January 14, 2008; April 15, 2008; and June 17, 2008. Groundwater monitoring associated with the F-Pond was discontinued after the April 2008 event based on the demonstration of no impact to groundwater from the F-Pond, as determined by total and dissolved lead concentrations that have remained below the Illinois EPA's Tier I Groundwater Remediation Objective of 100 ug/l for Class II groundwater during the monitoring period. U.S. EPA concurred that lead concentrations in the groundwater at the F-Pond did not exceed the Illinois EPA's Tier I Groundwater Remediation Objective of 7.5 ug/l for Class I groundwater. Based on these results, we are proposing to plug and abandon the F-Pond groundwater monitoring wells (FP-1, FP-2 and FP-3).

With respect to the requested soil sample results from the F-Pond monitoring wells, soil samples were not collected from these wells. A lithological description of the material encountered during the installation of the monitoring wells is contained in Appendix F of the CMCR.

IV. SPECIFIC COMMENTS ON THE CMCR ADDENDUM

Table 2, Field Parameter and Laboratory Analytical Results for Groundwater Samples

U.S. EPA Comment No. 12: For ease of comparison, this table and similar tables in subsequent monitoring reports should be expanded to include groundwater quality criteria (i.e., IEPA TACO

Tier I GROs) that will be used to screen detected total lead concentrations and determine the need for additional corrective measures.

ENTACT Response: Table 2 of the CMCR has been revised to reflect this Comment.

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June 17, 2008

Mr. Jonathan Adenuga
U.S. EPA Region 5, DE-9J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

RE: Groundwater Monitoring Letter Report
4th Quarter FP-3 Monitoring Event
Keystone Steel & Wire Company
7000 SW Adams Street, Peoria, Illinois

Dear Mr. Adenuga:

On behalf of the Keystone Steel & Wire Company ("Keystone"), ENTACT Services LLC ("ENTACT") is submitting this Groundwater Monitoring Letter Report for the 4th Quarter FP-3 Monitoring Event. This letter report presents and discusses the groundwater monitoring results from the April 29, 2008 monitoring event conducted pursuant to the requirements of corrective action for the Class II groundwater monitoring program at the F-Pond.

Monitoring of the FP-3 groundwater monitoring well is required for a period of 1 year after installation to demonstrate the completion of satisfactory remediation of impacted material within the F-Pond. Since suspect constituent concentrations were detected in the F-Pond groundwater monitoring wells during the August 2007 event, the remainder of the F-Pond groundwater monitoring wells were also sampled during this quarterly event, as previously discussed in the Groundwater Monitoring Letter Report dated January 14, 2008. The following sections describe the sampling procedures, field parameter results and laboratory analytical results for the April 29, 2008 sampling event.

Groundwater Monitoring Events

Groundwater samples were collected by Keystone's groundwater monitoring consultant, EarthTech, from monitoring wells FP-1, FP-2, FP-3, and TL-3 at the F-Pond on April 28, 2008. Groundwater samples were previously collected from groundwater monitoring wells FP-1 and FP-2 in July 2006, October 2006, January 2007, April 2007, August 2007, October 2007, and February 2008; from FP-3 in July 2007, October 2007 and February 2008; and from TL-3 in November 2006, January 2007, April 2007, August 2007, October 2007, and February 2008.

Sampling Procedures

Prior to sampling, water level measurements were taken at the monitoring wells with an electronic water level measuring device to determine the depth to groundwater. A summary of

the water level measurements is presented on Table 1 and the groundwater flow direction and elevations are presented on Figure 1.

After measurement, the monitoring wells were purged and sampled using clean disposable bailers. The depth to groundwater information collected was used to determine the amount of groundwater required to be removed from the well prior to sampling. At least three well volumes were removed by hand bailing prior to collecting a sample.

Groundwater samples were then collected from the monitoring wells and were submitted for laboratory analysis of total and dissolved lead by U.S. EPA Method SW-846 6020. The samples from each monitoring wells were collected in two 500 ml plastic containers and preserved with nitric acid. A 0.45 micron filter was used to filter a separate aliquot sample for dissolved lead. A separate aliquot sample was also collected from the monitoring well for field measurements of temperature, pH, conductivity, and turbidity (see Table 2 for the field parameter results). The samples were placed in a cooler with ice under chain-of-custody. The samples were picked up by a laboratory courier for delivery to PDC Laboratories in Peoria, Illinois. The purge water was containerized and transferred to the groundwater monitoring zone treatment system, which ultimately connects to the facility's wastewater treatment system, for disposal.

Analytical Results

The laboratory analytical results indicate that total and dissolved lead concentrations were below the laboratory detection limit of 1 part per billion (ppb) in the samples from monitoring wells FP-2, FP-3 and TL-3. Total lead were detected in the sample from monitoring well FP-1, located upgradient of the F-Pond, at a concentration of 2.8 ppb. The dissolved lead concentration was below the laboratory detection limit of 1 ppb.

The laboratory analytical results for all of the monitoring events are presented on Table 2 and the laboratory analytical report is included as Attachment 1.

Discussion

Per the requirements of Sections 3.2.9 and 3.3.8 of the *Corrective Measures Implementation Workplan, Revision 2* dated April 17, 2006, groundwater monitoring was to be conducted on a quarterly basis for a period of one year. Because detections were noted in monitoring well TL4-R during the year, an additional groundwater monitoring well, FP-3, was installed downgradient of monitoring well TL4-R outside of the limits of the F-Pond and the Tail Tracks Landfill. This monitoring well is to be monitored on a quarterly basis for a period of one year. Due to the suspect total lead detections in monitoring wells FP-1 and FP-2 during the August 2007 sampling event, Keystone proposed to continue monitoring the F-Pond monitoring wells for 2 quarters in

order to demonstrate satisfactory remediation of the F-Pond. The April 28, 2008 groundwater monitoring event represents the last groundwater monitoring event required at the F-Pond.

Total and dissolved lead concentrations at the F-Pond have remained below the Illinois EPA's Tier I Groundwater Remediation Objective of 100 ug/l for Class II groundwater. We believe that Keystone has successfully demonstrated that there are no impacts to groundwater from the F-Pond and North Ditch Staging Area and that Keystone has met the groundwater monitoring requirements described in the *Corrective Measures Implementation Workplan, Revision 2.0* dated April 17, 2006. Based on this fact, Keystone proposes to permanently cease monitoring at the F-Pond and North Ditch Staging Area and plug and abandon monitoring wells FP-1, FP-2, FP-3, NDSA-1, and NDSA-2. The monitoring wells will be plugged and abandoned by a well driller licensed in the State of Illinois in accordance with the requirements of the Illinois Water Well Construction Code (Title 77 of the Illinois Administrative Code, Section 920.120).

Conclusion

Based on the monitoring results for the F-Pond and North Ditch Staging Area and U.S. EPA's May 22, 2008 letter, groundwater monitoring at the F-Pond and North Ditch Staging Area is complete. Keystone proposes to plug and abandon monitoring wells FP-1, FP-2, FP-3, NDSA-1, and NDSA-2 at both the F-Pond and North Ditch Staging Area.

If you have any questions or issues regarding this addendum, please feel free to contact me at (972) 580-1323 or Chad Erdmann with Keystone at (309) 697-7165.

Respectfully,

Jenny Self

Jenny Self
ENTACT Services LLC

Attachments

cc: Chad Erdmann, Keystone Steel & Wire Company
Jim Moore, IEPA
Thad Slaughter, ENTACT Services, LLC

TABLE 1
Water Level Measurements for Groundwater Monitoring Wells
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

Monitoring Well ID No.	Installation/ Sample Date	Ground Elevation (ft amsl)	TOC Elevation (ft amsl)	Standpipe Stickup (+) Stickdown (-)	Depth to Water (ft from gs)	Depth to Water (ft from TOC)	Water Elevation (ft amsl)
F-Pond Monitoring Wells							
FP-1	05/02/06	450.75	453.25	+2.50			
	07/13/06				9.94	12.44	440.81
	10/05/06				10.41	12.91	440.34
	01/16/07				7.48	9.98	443.27
	04/24/07				5.38	7.88	445.37
	08/01/07				5.07	7.57	445.68
	10/31/07				4.93	7.43	445.82
	02/04/08				7.30	9.80	443.45
	04/28/08				8.00	10.50	442.75
FP-2	05/03/06	443.54	446.04	+2.50			
	07/13/06				4.72	7.22	438.82
	10/05/06				4.37	6.87	439.17
	01/16/07				0.71	3.21	442.83
	04/24/07				3.59	6.09	439.95
	08/01/07				4.38	6.88	439.16
	10/31/07				4.07	6.57	439.47
	02/04/08				4.09	6.59	439.45
	04/28/08				2.97	5.47	440.57
FP-3	07/18/07	442.87	446.45	+3.58			
	07/19/07				-0.55	3.03	443.42
	8/1/2007				-0.17	3.41	443.04
	10/31/07				-0.19	3.39	443.06
	02/04/08				-0.23	3.35	443.10
	04/28/08				-0.79	2.79	443.66
TL-3	09/18/01	444.01	446.60	+2.59			
	11/28/06				2.55	5.14	441.46
	01/16/07				-1.03	1.56	445.04
	04/24/07				1.40	3.99	442.61
	08/01/07				1.93	4.52	442.08
	10/31/07				1.73	4.32	442.28
	02/04/08				1.56	4.15	442.45
	04/28/08				1.17	3.76	442.84
TL4-R	05/03/06	448.95	451.45	+2.50			
	07/13/06				9.53	12.03	439.42
	10/05/06				9.55	12.05	439.40
	01/16/07				6.07	8.57	442.88
	04/25/07				6.83	9.33	442.12
	07/18/07	MW was plugged and abandoned.					
North Ditch Staging Area Monitoring Wells							
NDSA-1	05/02/06	449.67	449.67	-0.32			
	07/13/06				9.40	9.08	440.59
	10/05/06				9.87	9.55	440.12
	01/16/07				7.37	7.05	442.62
	04/24/07				6.95	6.63	443.04

TABLE 1
Water Level Measurements for Groundwater Monitoring Wells
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

Monitoring Well ID No.	Installation/ Sample Date	Ground Elevation (ft amsl)	TOC Elevation (ft amsl)	Standpipe Stickup (+) Stickdown (-)	Depth to Water (ft from gs)	Depth to Water (ft from TOC)	Water Elevation (ft amsl)
NDSA-1	08/01/07				8.52	8.20	441.47
NDSA-2	05/02/06	448.62	448.62	-0.30			
	07/13/06				10.17	9.87	438.75
	10/05/06				8.64	8.34	440.28
	01/16/07				11.38	11.08	437.54
	04/24/07				9.09	8.79	439.83
	08/01/07				13.31	13.01	435.61
T-6A	11/06/89	449.10	451.67	+2.57			
	07/13/06				8.30	10.87	440.80
	10/05/06				8.72	11.29	440.38
	01/16/07				5.98	8.55	443.12
	04/24/07				5.94	8.51	443.16
	08/01/07				7.74	10.31	441.36
W-2	01/15/86	448.60	451.79	+3.19			
	07/13/06				9.61	12.80	438.99
	10/05/06				9.73	12.92	438.87
	01/16/07				5.79	8.98	442.81
	04/24/07				6.44	9.63	442.16
	08/01/07				8.25	11.44	440.35

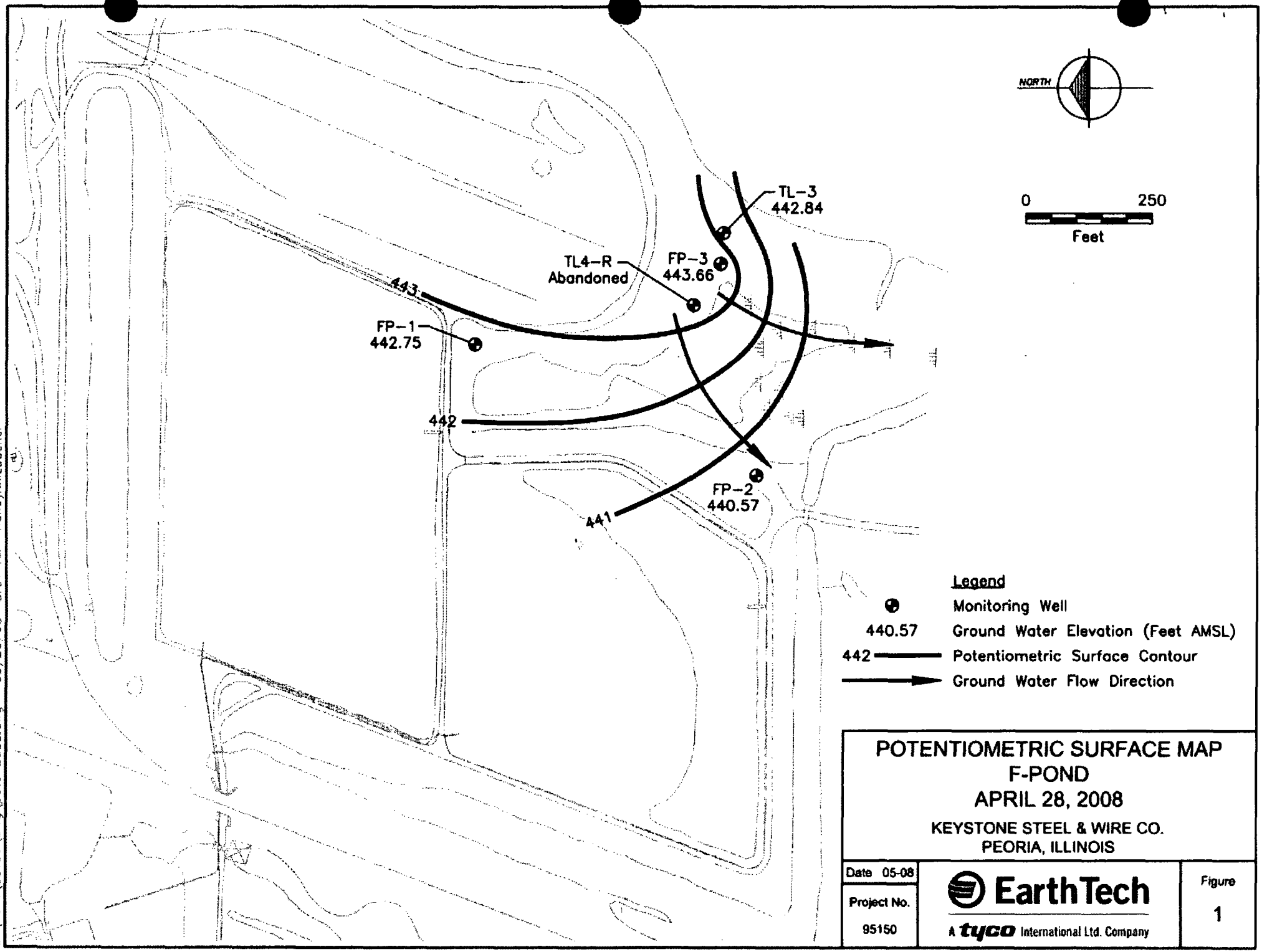
TABLE 2
Field Parameter and Laboratory Analytical Results for Groundwater Samples
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

MW ID No.	Sample Date	Total Lead (ug/l)	Dissolved Lead (ug/l)	pH (s.u.)	Conductivity (mS/cm)	Turbidity (NTU)	Temperature (°C)	Comments
F-Pond Monitoring Wells								
FP-1	07/13/06	13	<5	7.58	1.940	175	21.10	
	10/06/06	6.6	<5	7.43	1.560	9	15.10	
	01/17/07	6.6	<5	7.00	1.450	15	11.10	
	04/25/07	3	<1	6.88	1.640	10	11.19	
	08/02/07	10	<1	6.91	1.560	11.6	25.89	
	10/31/07	2.3	<1	6.80	1.480	17.8	15.79	
	10/31/07	1.3	<1	7.33	1.470	14	16.53	Duplicate
	02/05/08	4	1.3	7.50	1.070	6	7.10	
	04/29/08	2.8	<1	6.91	1.570	10	9.00	
FP-2	07/13/06	<5	<5	6.05	2.270	118	20.30	
	10/06/06	<5	<5	6.65	2.060	6	15.10	
	10/06/06	<5	<5	6.71	2.020	9	15.90	Duplicate
	01/17/07	<5	<5	6.30	1.700	1	7.20	
	01/17/07	<5	<5	6.30	1.700	1	7.20	Duplicate
	04/25/07	<1	<1	6.59	2.070	9.8	10.36	
	08/02/07	1.5	<1	6.58	2.080	45.2	17.13	
	08/02/07	15	<1	6.52	2.080	47.8	16.95	Duplicate
	10/31/07	<1	<1	6.23	2.120	23.6	15.78	
	02/05/08	<1	<1	6.29	1.540	15	9.00	
	04/29/08	<1	<1	6.47	2.070	15.5	9.45	
	04/29/08	<1	<1	6.52	2.120	18.1	9.64	Duplicate
FP-3	07/19/07	1.8	<1	6.11	1.680	127	16.50	
	10/31/07	<1	<1	6.65	1.600	8.5	14.28	
	02/05/08	<1	<1	6.58	1.210	12	8.50	
	04/29/08	<1	<1	6.71	1.560	13.8	10.55	
TL-3	11/29/06	<5	<5	7.23	1.960	114	17.09	
	01/17/07	<5	<5	9.21	1.710	14	3.50	
	04/25/07	1.5	<1	6.57	2.650	56	11.79	
	08/02/07	<1	<1	6.94	1.570	24.2	19.68	
	10/31/07	<1	<1	6.61	1.710	12.9	14.52	
	02/05/08	<1	<1	6.87	1.100	8	7.70	
	02/05/08	1.5	<1	6.11	1.090	20	8.30	Duplicate
	04/29/08	<1	<1	6.85	1.400	12.4	10.45	
TLR-4	07/13/06	11000	8800	11.41	5.430	120	21.40	
	10/06/06	17000	18000	12.49	4.400	17	17.00	
	01/17/07	470	200	12.22	1.740	0	9.60	
	04/25/07	No sample collected - MW to be plugged and abandoned.						
	07/18/07	MW was plugged and abandoned.						
North Ditch Staging Area Monitoring Wells								
NDSA-1	07/13/06	<5	<5	5.46	0.950	15	20.30	
	10/06/06	<5	<5	6.52	0.944	11	17.10	
	01/17/07	<5	<5	5.87	0.819	11	11.80	
	04/25/07	<1	<1	6.56	0.866	24	11.75	

TABLE 2
Field Parameter and Laboratory Analytical Results for Groundwater Samples
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

MW ID No.	Sample Date	Total Lead (ug/l)	Dissolved Lead (ug/l)	pH (s.u.)	Conductivity (mS/cm)	Turbidity (NTU)	Temperature (°C)	Comments
NDSA-1	04/25/07	1	<1	6.32	0.866	23	11.76	Duplicate
	08/02/07	<1	<1	6.25	0.854	30	17.78	
NDSA-2	07/13/06	<5	<5	5.98	0.990	3	20.30	
	10/06/06	<5	<5	6.75	0.934	6	16.70	
	01/17/07	<5	<5	6.26	0.905	0	10.90	
	04/25/07	<1	<1	6.69	1.199	12	10.13	
	08/02/07	<1	<1	6.41	0.977	4.4	17.20	
T-6A	07/13/06	<5	<5	5.67	1.290	15	19.00	
	07/13/06	<5	<5	5.57	1.320	26	19.70	Duplicate
	10/06/06	<5	<5	6.67	1.180	11	15.40	
	01/17/07	<5	<5	6.25	1.050	7	10.90	
	04/25/07	<1	<1	6.42	1.280	22	11.22	
	08/02/07	<1	<1	6.37	1.225	24	16.80	
W-2	07/13/06	<5	<5	5.81	1.450	106	20.30	
	10/06/06	6.5	<5	7.22	1.340	8	15.10	
	01/17/07	<5	<5	6.32	1.140	0	11.40	
	04/25/07	<1	<1	6.55	1.315	24	10.54	
	08/02/07	1.4	<1	6.34	1.355	42.2	18.61	

Notes:
<: Less than the detection limit


NORTH
0
250
Feet
TL-3
442.84
TL4-R
Abandoned
FP-3
443.66
443
FP-1
442.75
442
FP-2
440.57
441
Legend
Monitoring Well
440.57 Ground Water Elevation (Feet AMSL)
442 Potentiometric Surface Contour
Ground Water Flow Direction
POTENTIOMETRIC SURFACE MAP
F-POND
APRIL 28, 2008
KEYSTONE STEEL & WIRE CO.
PEORIA, ILLINOIS
Date 05-08
Project No.
95150
EarthTech
A tyco International Ltd. Company
Figure
1
L:\work\95150\Dwg\pot042808.dwg 05/20/08 8:37 AM nancy.wilzbacher

ATTACHMENT 1

LABORATORY ANALYTICAL REPORT

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

May 9, 2008

Mr. Andy Duwelius
Earth Tech
5010 Stone Mill Road
Bloomington, IN 47408

Dear Mr. Duwelius:

Enclosed is the quality control deliverables for the April 29, 2008 groundwater sampling of Keystone Steel & Wire F-Pond. If you have any questions, please call.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

XC: Mr. Chad Erdman, Keystone Steel & Wire Co.

recycled paper

EARTH TECH
BLOOMINGTON, IN

KEYSTONE STEEL & WIRE CO.
F-POND

SAMPLING EVENT:
APRIL 29, 2008

REPORT DATE:
MAY 9, 2008

TABLE OF CONTENTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

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Metals Analyses – Quality Control Documentation	7

CASE NARRATIVE

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

To: Earth Tech

Facility: Keystone Steel & Wire Company, Project Number 95150

INORGANICS CASE NARRATIVE

Four groundwater samples and one duplicate sample were received on April 29, 2008 for analysis in accordance with our Level II protocol. The samples arrived in good condition with a cooler temperature of 6°C. The samples were analyzed for Lead, Total and Dissolved (SW-846 Method 6020).

The analyses were performed according to protocol and within the maximum allowable holding times. The samples were analyzed on May 7, 2008 and May 8, 2008.

The matrix spike and matrix spike duplicate analyses was performed on FP-1.

The recoveries for accuracy and precision were within their required QC limits. Recoveries on the other quality control parameters (blanks, controls, verifications, etc.) were within the required QC limits.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

COVER PAGE

PDC Laboratories, Inc.
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(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

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Form 0

INORGANIC ANALYSIS COVER PAGE

Client Sample ID	Lab Sample ID	Date Collected	Final Date Analyzed
FP-1	08044479-1	29-Apr-08	08-May-08
FP-2	08044479-2	29-Apr-08	08-May-08
FP-3	08044479-3	29-Apr-08	08-May-08
TL-3	08044479-4	29-Apr-08	08-May-08
Dup-0429	08044479-5	29-Apr-08	08-May-08

CHAIN OF CUSTODY

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

State where samples collected IL

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT) - (SAMPLE ACCEPTANCE POLICY ON REVERSE)

1 CLIENT: Earth Tech / Keystone
ADDRESS: 5010 Stone Mill Rd
CITY STATE ZIP: Bloomington, IN 47404
CONTACT PERSON: Andy Duwelius

PROJECT NUMBER: 95150
P.O. NUMBER:
MEANS SHIPPED:
PHONE NUMBER: 812-336-0972
FAX NUMBER: 812-336-3991
DATE SHIPPED:
SAMPLER (PLEASE PRINT): Duwelius
SAMPLER'S SIGNATURE: Duwelius

MATRIX TYPES: WW-WASTEWATER, DW-DRINKING WATER, GW-GROUND WATER, WWSL-SLUDGE, NAS-SOLID, L'CHT-LEACHATE, OTHER:

3 ANALYSIS REQUESTED

4 (FOR LAB USE ONLY)
LOGIN #: 08044419-5
LOGGED BY:
LAB PROJ. #:
TEMPLATE:
PROJ. MGR.:

2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	BOTTLE COUNT	TOTAL LEAD	DISS. LEAD						REMARKS
FP-1	4.29.08	0658	X		GW	2	X	X						
FP-2	4.29.08	0727	X		GW	2	X	X						
FP-3	4.29.08	0714	X		GW	2	X	X						
TL-3	4.29.08	0719	X		GW	2	X	X						
Dup-0429	4.29.08	0800	X		GW	2	X	X						

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) NORMAL RUSH DATE RESULTS NEEDED
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.

7 RELINQUISHED BY: (SIGNATURE) J.A. Duwelius DATE 4-29-08 TIME 11:28 RECEIVED BY: (SIGNATURE) DATE TIME
RELINQUISHED BY: (SIGNATURE) DATE TIME RECEIVED BY: (SIGNATURE) DATE TIME
RELINQUISHED BY: (SIGNATURE) DATE TIME RECEIVED AT LAB BY: (SIGNATURE) [signature] DATE 4/29/08 TIME 11:28

8 COMMENTS: (FOR LAB USE ONLY)
SAMPLE TEMPERATURE UPON RECEIPT ___ °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) Y OR N
(EXCLUDES TYPICAL FIELD PARAMETERS)
DATE AND TIME TAKEN FROM SAMPLE BOTTLE ___

Copies: white should accompany samples to PDC Labs. Yellow copy to be retained by the client.

PAGE ___ OF ___

00000004

TABULATED ANALYTICAL RESULTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

Laboratory Results

Earth Tech
5010 Stone Mill Road

Bloomington, IN 47408
Attn : Mr. Andy Duwelius

Date Received : 04/29/08 11:28
Report Date 05/09/08
Customer # : 205746
P.O. Number : WN32918
Facility : KEYSTONE

Sample No: **08044479-1** Collect Date **04/29/08 06:58**
Client ID : **PROJECT 95150** Site : **FP-1** Locator : **KEYSTONE STEEL**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			05/01/08 10:15	BAB
SW-846 6020				
Lead		2.8 ug/l	05/08/08 08:00	JMW
Lead, Dissolved	U	1 ug/l	05/07/08 07:17	JMW

Sample No: **08044479-2** Collect Date **04/29/08 07:27**
Client ID : **PROJECT 95150** Site : **FP-2** Locator : **KEYSTONE STEEL**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			05/01/08 10:15	BAB
SW-846 6020				
Lead	U	1 ug/l	05/08/08 08:05	JMW
Lead, Dissolved	U	1 ug/l	05/07/08 07:42	JMW

Sample No: **08044479-3** Collect Date **04/29/08 07:14**
Client ID : **PROJECT 95150** Site : **FP-3** Locator : **KEYSTONE STEEL**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			05/01/08 10:15	BAB
SW-846 6020				
Lead	U	1 ug/l	05/08/08 08:11	JMW
Lead, Dissolved	U	1 ug/l	05/07/08 07:47	JMW

Sample No: **08044479-4** Collect Date **04/29/08 07:19**
Client ID : **PROJECT 95150** Site : **TL-3** Locator : **KEYSTONE STEEL**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			05/01/08 10:15	BAB
SW-846 6020				
Lead	U	1 ug/l	05/08/08 08:16	JMW
Lead, Dissolved	U	1 ug/l	05/07/08 07:52	JMW

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

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Laboratory Results

Earth Tech
5010 Stone Mill Road

Bloomington, IN 47408
Attn : Mr. Andy Duwelius

Date Received : 04/29/08 11:28
Report Date 05/09/08
Customer # : 205746
P.O. Number : WN32918
Facility : KEYSTONE

Sample No: **08044479-5** Collect Date **04/29/08 08:00**
Client ID : **PROJECT 95150** Site : **DUP-0429** Locator : **KEYSTONE STEEL**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			05/01/08 10:15	BAB
SW-846 6020				
Lead	U	1 ug/l	05/08/08 08:21	JMW
Lead, Dissolved	U	1 ug/l	05/07/08 07:57	JMW

PDC Laboratories participates in the following laboratory accreditation/certification and proficiency programs. Endorsement by the Federal or State Government or their agencies is not implied.

NELAC Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230
State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
Drinking Water Certifications: Indiana (C-IL-040); Kansas (E-10338); Kentucky (90058); Missouri (00870); Wisconsin (998294430)
Wastewater Certifications: Arkansas; Iowa (240); Kansas (E-10338); Wisconsin (99829443)
Hazardous/Solid Waste Certifications: Arkansas; Kansas (E-10338); Wisconsin (998294430)
UST Certification: Iowa (240)

Certified by: Gail Schindler
Gail Schindler, Project Manager

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METALS
QUALITY CONTROL DOCUMENTATION

PDC Laboratories Quality Control Summary Report

PROJECT: 08044479

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
QC CROSS REFERENCE REPORT

Lab ID	Client ID	Prep. Lot	Analysis Lot	Analysis Date	Analyst	Method	Sample Tag
08044479-1	FP-1		WG164972	07-May-08 07:17	JMW	SW-846 6020	D10:1
08044479-1	FP-1	WG164596	WG165092	08-May-08 08:00	JMW	SW-846 6020	D10:1
08044479-2	FP-2		WG164972	07-May-08 07:42	JMW	SW-846 6020	D10:1
08044479-2	FP-2	WG164596	WG165092	08-May-08 08:05	JMW	SW-846 6020	D10:1
08044479-3	FP-3		WG164972	07-May-08 07:47	JMW	SW-846 6020	D10:1
08044479-3	FP-3	WG164596	WG165092	08-May-08 08:11	JMW	SW-846 6020	D10:1
08044479-4	TL-3		WG164972	07-May-08 07:52	JMW	SW-846 6020	D10:1
08044479-4	TL-3	WG164596	WG165092	08-May-08 08:16	JMW	SW-846 6020	D10:1
08044479-5	DUP-0429		WG164972	07-May-08 07:57	JMW	SW-846 6020	D10:1
08044479-5	DUP-0429	WG164596	WG165092	08-May-08 08:21	JMW	SW-846 6020	D10:1

METHOD BLANK

Laboratory ID: WG164596-1 Analysis Lot: WG165092 Prep Batch: WG164596 Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	1.0U	1.0	08-May-08 07:43

Laboratory ID: WG164972-3 Analysis Lot: WG164972 Prep Batch: N/A Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	1.0U	1.0	07-May-08 07:00

LABORATORY CONTROL SAMPLE

Laboratory ID: WG164596-2 Analysis Lot: WG165092 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	556	570	103	80.0-120	08-May-08 07:47

Laboratory ID: WG164972-4 Analysis Lot: WG164972 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	500	480	96.0	80.0-120	07-May-08 07:04

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Laboratory IDs: WG164972-5, WG164972-6 Analysis Lot: WG164972 Sample Spiked: 08044479-1 Site: FP-1 Sample Tag: D10:1

Analyte	Units	Amt MS Spiked	Amt MSD Spiked	Sample Value	MS Value	MSD Value	MS % Rec	MSD % Rec	Rec Limits	RPD	RPD Limits
Lead, Dissolved	UG/L	500	500	1.0U	450	460	90.0	92.0	75.0-125	2.20	20.0

PDC Laboratories Quality Control Summary Report

PROJECT: 08044479

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
INITIAL CALIBRATION VERIFICATION

INITIAL CALIBRATION VERIFICATION

Laboratory ID: WG164972-1 Analysis Lot: WG164972 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25.	25.	100	90.0-110	07-May-08 06:50

Laboratory ID: WG165092-1 Analysis Lot: WG165092 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25.	25.	100	90.0-110	08-May-08 07:28

INITIAL CALIBRATION BLANK

Laboratory ID: WG164972-2 Analysis Lot: WG164972

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.10U	0.10	07-May-08 06:45

Laboratory ID: WG165092-2 Analysis Lot: WG165092

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	08-May-08 07:38

CONTINUING CALIBRATION BLANK

Laboratory ID: WG164972-8 Analysis Lot: WG164972

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.10U	0.10	07-May-08 08:17

Laboratory ID: WG165092-4 Analysis Lot: WG165092

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	08-May-08 09:00

CONTINUING CALIBRATION VERIFICATION

Laboratory ID: WG164972-7 Analysis Lot: WG164972 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25	25	100	90.0-110	07-May-08 08:07

PDC Laboratories Quality Control Summary Report

PROJECT: 08044479

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
CONTINUING CALIBRATION VERIFICATION

Laboratory ID: WG165092-3 Analysis Lot: WG165092 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25	25	100	90.0-110	08-May-08 08:42

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

May 22, 2008

LU-9J

REPLY TO THE ATTENTION OF:

Vic Stirnaman
Executive Vice President
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Groundwater Monitoring Letter Report
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Stirnaman

In our May 8, 2008, letter to you, the United States Environmental Protection Agency (U.S. EPA) expressed some concerns regarding the erratic lead levels reported during the August and October 2007 groundwater monitoring events in monitoring well FP-1. The U.S. EPA also informed you in a February 2008 letter, that if at the conclusion of the next two quarterly events of monitoring, any monitoring well, including monitoring well FP-1 continues to exceed for lead levels, KS&W must immediately submit a new proposal to address the contamination at the F-Pond area.

After re-evaluating the monitoring well (FP-1) data, the U.S. EPA does not believe that the lead concentrations detected to date in the FP-1 monitoring well exceed the lead levels for class 1 groundwater. We hope this letter clarifies our earlier position.

If you have any questions, please contact me at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Land and Chemicals Division
Corrective Action Section 2

Cc: Chad Erdmann, KS&W
Cc: Jim Moore, IEPA

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

May 8, 2008

LU-9J

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vic Stirnaman
Executive Vice President
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Groundwater Monitoring Letter Report
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Stirnaman

The U.S. EPA has completed the review of your April 15, 2008, Groundwater Monitoring Letter Report for the Keystone Steel and Wire (KS&W) Company. The letter report presents results of the February 5, 2008, groundwater monitoring events at the F-Pond Area.

In our February 26, 2008 letter, we expressed some of our concerns regarding the erratic lead levels reported during the August and October 2007 groundwater monitoring events in monitoring well FP-1. We also informed you in the February 2008 letter, that if at the conclusion of the next two quarters, any monitoring well including FP-1 continues to exceed for lead levels, KS&W must immediately submit a new proposal to address the contamination at the F-Pond area. The recent result for the FP-1 monitoring well in your recent groundwater letter report confirms our suspension that the residual lead contamination in the F-Pond area is an issue that must be addressed.

You state in the discussion section of your April letter report **"The last groundwater monitoring event for the F-Pond will be scheduled for May 2008".** However, you have not indicated what KS&W would do if the lead levels in the FP-1 monitoring well continues to exceed for lead or any other hazardous constituents. Please respond within 7 days of receipt of this letter, explaining how you intend to address the above issue.

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

If you have any questions, please contact me at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Land and Chemicals Division
Corrective Action Section 2

Cc: Chad Erdmann, KS&W
Cc: Jim Moore, IEPA

ENTACT
environmental services

April 15, 2008

Mr. Jonathan Adenuga
U.S. EPA Region 5, DE-9J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

RE: Groundwater Monitoring Letter Report
3rd Quarter FP-3 Monitoring Event
Keystone Steel & Wire Company
7000 SW Adams Street, Peoria, Illinois

Dear Mr. Adenuga:

On behalf of the Keystone Steel & Wire Company ("Keystone"), ENTACT Services LLC ("ENTACT") is submitting this Groundwater Monitoring Letter Report for the 3rd Quarter FP-3 Monitoring Event. This letter report presents and discusses the groundwater monitoring results from the February 5, 2008 monitoring event conducted pursuant to the requirements of corrective action for the groundwater monitoring program at the F-Pond.

Monitoring of the FP-3 groundwater monitoring well is required for a period of 1 year after installation to demonstrate the completion of satisfactory remediation of impacted material within the F-Pond. Since suspect constituent concentrations were detected in the F-Pond groundwater monitoring wells during the August 2007 event, the remainder of the F-Pond groundwater monitoring wells were also sampled during this quarterly event, as previously discussed in the Groundwater Monitoring Letter Report dated January 14, 2008. The following sections describe the sampling procedures, field parameter results and laboratory analytical results for the February 5, 2008 sampling event.

Groundwater Monitoring Events

Groundwater samples were collected by Keystone's groundwater monitoring consultant, EarthTech, from monitoring wells FP-1, FP-2, FP-3, and TL-3 at the F-Pond on February 5, 2008. Groundwater samples were previously collected from groundwater monitoring wells FP-1 and FP-2 in July 2006, October 2006, January 2007, April 2007, August 2007, and October 2007; from FP-3 in July 2007 and October 2007; and from TL-3 in November 2006, January 2007, April 2007, August 2007, and October 2007.

Sampling Procedures

Prior to sampling, water level measurements were taken at the monitoring wells with an electronic water level measuring device to determine the depth to groundwater. A summary of

3129 Bass Pro Drive • Grapevine, Texas 76051 • p 972.580.1323 • f 972.550.7464
www.entact.com

the water level measurements is presented on Table 1 and the groundwater flow direction and elevations are presented on Figure 1.

After measurement, the monitoring wells were purged and sampled using clean disposable bailers. The depth to groundwater information collected was used to determine the amount of groundwater required to be removed from the well prior to sampling. At least three well volumes were removed by hand bailing prior to collecting a sample.

Groundwater samples were then collected from the monitoring wells and were submitted for laboratory analysis of total and dissolved lead by U.S. EPA Method SW-846 6020. The samples from each monitoring wells were collected in two 500 ml plastic containers and preserved with nitric acid. A 0.45 micron filter was used to filter a separate aliquot sample for dissolved lead. A separate aliquot sample was also collected from the monitoring well for field measurements of temperature, pH, conductivity, and turbidity (see Table 2 for the field parameter results). The samples were placed in a cooler with ice under chain-of-custody. The samples were picked up by a laboratory courier for delivery to PDC Laboratories in Peoria, Illinois. The purge water was containerized and transferred to the groundwater monitoring zone treatment system, which ultimately connects to the facility's wastewater treatment system, for disposal.

Analytical Results

The laboratory analytical results indicate that total and dissolved lead concentrations were below the laboratory detection limit of 1 part per billion (ppb) in the samples from monitoring wells FP-2, FP-3 and TL-3. Total and dissolved lead were detected in the sample from monitoring well FP-1, located upgradient of the F-Pond, at concentrations of 4 ppb and 1.3 ppb, respectively.

The laboratory analytical results for all of the monitoring events are presented on Table 2 and the laboratory analytical report is included as Attachment 1.

Discussion

Per the requirements of Sections 3.2.9 and 3.3.8 of the *Corrective Measures Implementation Workplan, Revision 2* dated April 17, 2006, groundwater monitoring was to be conducted on a quarterly basis for a period of one year. Because detections were noted in monitoring well TL4-R during the year, an additional groundwater monitoring well, FP-3, was installed downgradient of monitoring well TL4-R outside of the limits of the F-Pond and the Tail Tracks Landfill. This monitoring well is to be monitored on a quarterly basis for a period of one year. Due to the suspect total lead detections in monitoring wells FP-1 and FP-2 during the August 2007 sampling event, Keystone proposed to continue monitoring the F-Pond monitoring wells for 2 quarters in order to demonstrate satisfactory remediation of the F-Pond. The last groundwater monitoring event for the F-Pond will be scheduled for May 2008.

Conclusion

Keystone will continue to monitor the corrective action groundwater monitoring wells at the F-Pond for one additional quarter. Keystone has ceased monitoring and will close groundwater monitoring wells (NDSA-1 and NDSA-2) associated with the North Ditch Staging Area corrective action activities, as discussed in the Groundwater Monitoring Letter Report dated January 14, 2008, upon U.S. EPA's approval.

If you have any questions or issues regarding this addendum, please feel free to contact me at (972) 580-1323 or Chad Erdmann with Keystone at (309) 697-7165.

Respectfully,

Jenny Self

Jenny Self
ENTACT Services LLC

Attachments

cc: Chad Erdmann, Keystone Steel & Wire Company
Jim Moore, IEPA
Thad Slaughter, ENTACT Services, LLC

TABLE 1
Water Level Measurements for Groundwater Monitoring Wells
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

Monitoring Well ID No.	Installation/ Sample Date	Ground Elevation (ft amsl)	TOC Elevation (ft amsl)	Standpipe Stickup (+) Stickdown (-)	Depth to Water (ft from gs)	Depth to Water (ft from TOC)	Water Elevation (ft amsl)
F-Pond Monitoring Wells							
FP-1	05/02/06	450.75	453.25	+2.50			
	07/13/06				9.94	12.44	440.81
	10/05/06				10.41	12.91	440.34
	01/16/07				7.48	9.98	443.27
	04/24/07				5.38	7.88	445.37
	08/01/07				5.07	7.57	445.68
	10/31/07				4.93	7.43	445.82
	02/04/08				7.30	9.80	443.45
FP-2	05/03/06	443.54	446.04	+2.50			
	07/13/06				4.72	7.22	438.82
	10/05/06				4.37	6.87	439.17
	01/16/07				0.71	3.21	442.83
	04/24/07				3.59	6.09	439.95
	08/01/07				4.38	6.88	439.16
	10/31/07				4.07	6.57	439.47
	02/04/08				4.09	6.59	439.45
FP-3	07/18/07	442.87	446.45	+3.58			
	07/19/07				-0.55	3.03	443.42
	8/1/2007				-0.17	3.41	443.04
	10/31/07				-0.19	3.39	443.06
	02/04/08				-0.23	3.35	443.10
TL-3	09/18/01	444.01	446.60	+2.59			
	11/28/06				2.55	5.14	441.46
	01/16/07				-1.03	1.56	445.04
	04/24/07				1.40	3.99	442.61
	08/01/07				1.93	4.52	442.08
	10/31/07				1.73	4.32	442.28
	02/04/08				1.56	4.15	442.45
TL4-R	05/03/06	448.95	451.45	+2.50			
	07/13/06				9.53	12.03	439.42
	10/05/06				9.55	12.05	439.40
	01/16/07				6.07	8.57	442.88
	04/25/07				6.83	9.33	442.12
	07/18/07	MW was plugged and abandoned.					
North Ditch Staging Area Monitoring Wells							
NDSA-1	05/02/06	449.67	449.67	-0.32			
	07/13/06				9.40	9.08	440.59
	10/05/06				9.87	9.55	440.12
	01/16/07				7.37	7.05	442.62
	04/24/07				6.95	6.63	443.04
	08/01/07				8.52	8.20	441.47
NDSA-2	05/02/06	448.62	448.62	-0.30			
	07/13/06				10.17	9.87	438.75
	10/05/06				8.64	8.34	440.28

TABLE 1
Water Level Measurements for Groundwater Monitoring Wells
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

Monitoring Well ID No.	Installation/ Sample Date	Ground Elevation (ft amsl)	TOC Elevation (ft amsl)	Standpipe Stickup (+) Stickdown (-)	Depth to Water (ft from gs)	Depth to Water (ft from TOC)	Water Elevation (ft amsl)
NDSA-2	01/16/07				11.38	11.08	437.54
	04/24/07				9.09	8.79	439.83
	08/01/07				13.31	13.01	435.61
T-6A	11/06/89	449.10	451.67	+2.57			
	07/13/06				8.30	10.87	440.80
	10/05/06				8.72	11.29	440.38
	01/16/07				5.98	8.55	443.12
	04/24/07				5.94	8.51	443.16
	08/01/07				7.74	10.31	441.36
W-2	01/15/86	448.60	451.79	+3.19			
	07/13/06				9.61	12.80	438.99
	10/05/06				9.73	12.92	438.87
	01/16/07				5.79	8.98	442.81
	04/24/07				6.44	9.63	442.16
	08/01/07				8.25	11.44	440.35

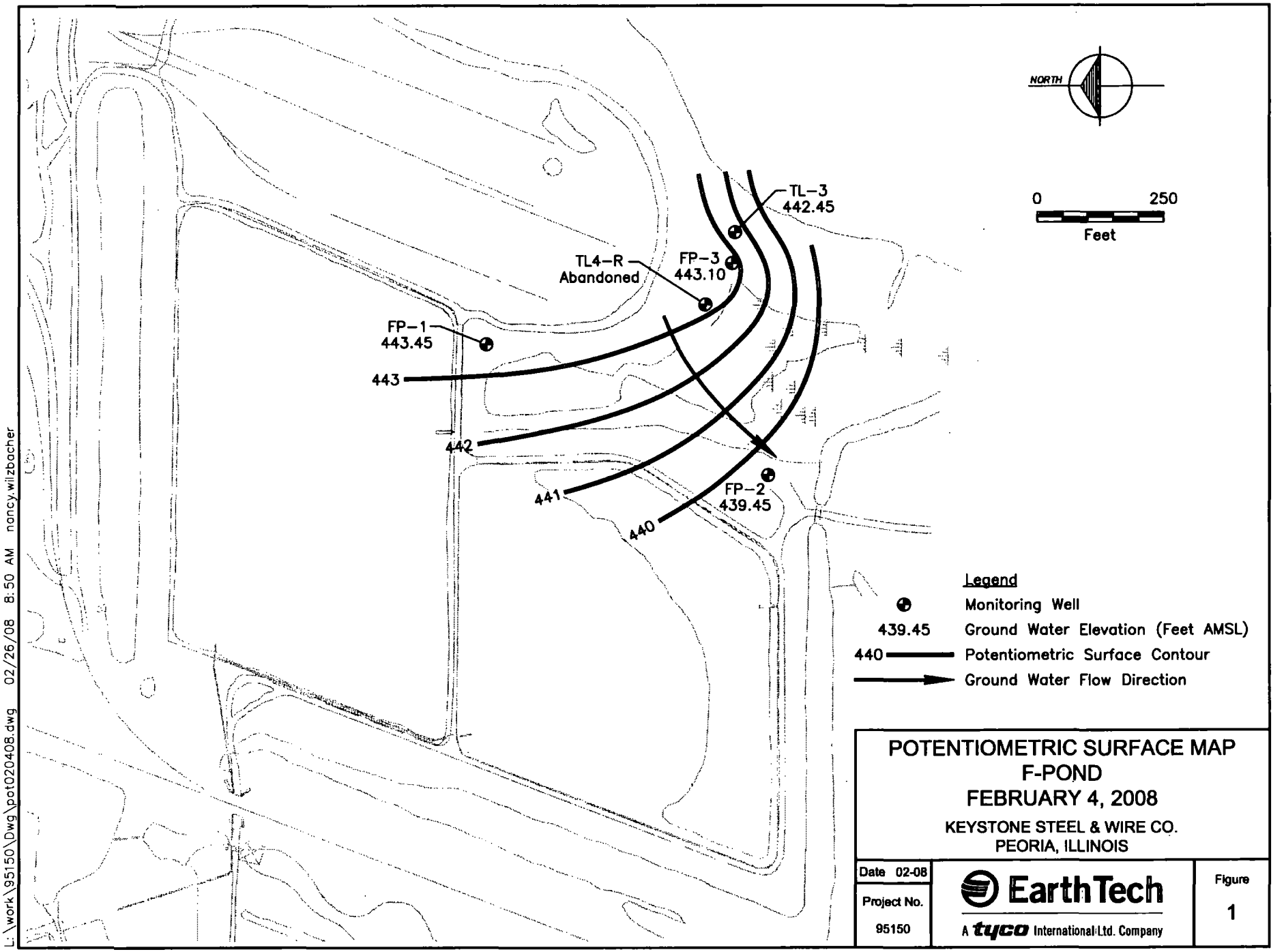
TABLE 2
Field Parameter and Laboratory Analytical Results for Groundwater Samples
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

MW ID No.	Sample Date	Total Lead (ug/l)	Dissolved Lead (ug/l)	pH (s.u.)	Conductivity (mS/cm)	Turbidity (NTU)	Temperature (°C)	Comments
F-Pond Monitoring Wells								
FP-1	07/13/06	13	<5	7.58	1.940	175	21.10	
	10/06/06	6.6	<5	7.43	1.560	9	15.10	
	01/17/07	6.6	<5	7.00	1.450	15	11.10	
	04/25/07	3	<1	6.88	1.640	10	11.19	
	08/02/07	10*	<1	6.91	1.560	11.6	25.89	
	10/31/07	2.3	<1	6.80	1.480	17.8	15.79	
	10/31/07	1.3	<1	7.33	1.470	14	16.53	Duplicate
	02/05/08	4	1.3	7.50	1.070	6	7.10	
FP-2	07/13/06	<5	<5	6.05	2.270	118	20.30	
	10/06/06	<5	<5	6.65	2.060	6	15.10	
	10/06/06	<5	<5	6.71	2.020	9	15.90	Duplicate
	01/17/07	<5	<5	6.30	1.700	1	7.20	
	01/17/07	<5	<5	6.30	1.700	1	7.20	Duplicate
	04/25/07	<1	<1	6.59	2.070	9.8	10.36	
	08/02/07	1.5	<1	6.58	2.080	45.2	17.13	
	08/02/07	15*	<1	6.52	2.080	47.8	16.95	Duplicate
	10/31/07	<1	<1	6.23	2.120	23.6	15.78	
	02/05/08	<1	<1	6.29	1.540	15	9.00	
FP-3	07/19/07	1.8	<1	6.11	1.680	127	16.50	
	10/31/07	<1	<1	6.65	1.600	8.5	14.28	
	02/05/08	<1	<1	6.58	1.210	12	8.50	
TL-3	11/29/06	<5	<5	7.23	1.960	114	17.09	
	01/17/07	<5	<5	9.21	1.710	14	3.50	
	04/25/07	1.5	<1	6.57	2.650	56	11.79	
	08/02/07	<1	<1	6.94	1.570	24.2	19.68	
	10/31/07	<1	<1	6.61	1.710	12.9	14.52	
	02/05/08	<1	<1	6.87	1.100	8	7.70	
	02/05/08	1.5	<1	6.11	1.090	20	8.30	Duplicate
TLR-4	07/13/06	11000	8800	11.41	5.430	120	21.40	
	10/06/06	17000	18000	12.49	4.400	17	17.00	
	01/17/07	470	200	12.22	1.740	0	9.60	
	04/25/07	No sample collected - MW to be plugged and abandoned.						
	07/18/07	MW was plugged and abandoned.						
North Ditch Staging Area Monitoring Wells								
NDSA-1	07/13/06	<5	<5	5.46	0.950	15	20.30	
	10/06/06	<5	<5	6.52	0.944	11	17.10	
	01/17/07	<5	<5	5.87	0.819	11	11.80	
	04/25/07	<1	<1	6.56	0.866	24	11.75	
	04/25/07	1	<1	6.32	0.866	23	11.76	Duplicate
	08/02/07	<1	<1	6.25	0.854	30	17.78	
NDSA-2	07/13/06	<5	<5	5.98	0.990	3	20.30	
	10/06/06	<5	<5	6.75	0.934	6	16.70	
	01/17/07	<5	<5	6.26	0.905	0	10.90	

TABLE 2
Field Parameter and Laboratory Analytical Results for Groundwater Samples
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

MW ID No.	Sample Date	Total Lead (ug/l)	Dissolved Lead (ug/l)	pH (s.u.)	Conductivity (mS/cm)	Turbidity (NTU)	Temperature (°C)	Comments
NDSA-2	04/25/07	<1	<1	6.69	1.199	12	10.13	
	08/02/07	<1	<1	6.41	0.977	4.4	17.20	
T-6A	07/13/06	<5	<5	5.67	1.290	15	19.00	
	07/13/06	<5	<5	5.57	1.320	26	19.70	Duplicate
	10/06/06	<5	<5	6.67	1.180	11	15.40	
	01/17/07	<5	<5	6.25	1.050	7	10.90	
	04/25/07	<1	<1	6.42	1.280	22	11.22	
	08/02/07	<1	<1	6.37	1.225	24	16.80	
W-2	07/13/06	<5	<5	5.81	1.450	106	20.30	
	10/06/06	6.5	<5	7.22	1.340	8	15.10	
	01/17/07	<5	<5	6.32	1.140	0	11.40	
	04/25/07	<1	<1	6.55	1.315	24	10.54	
	08/02/07	1.4	<1	6.34	1.355	42.2	18.61	

Notes:
<: Less than the detection limit



L:\work\95150\Dwg\pot020408.dwg 02/26/08 8:50 AM nancy.wilzbacher

ATTACHMENT 1

LABORATORY ANALYTICAL REPORT

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

February 20, 2008

Mr. Andy Duwelius
Earth Tech
5010 Stone Mill Road
Bloomington, IN 47408

Dear Mr. Duwelius:

Enclosed is the quality control deliverables for the February 5,2008 groundwater sampling of Keystone Steel & Wire F-Pond. If you have any questions, please call.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

XC: Mr. Chad Erdman, Keystone Steel & Wire Co.

recycled paper

EARTH TECH
BLOOMINGTON, IN

KEYSTONE STEEL & WIRE CO.
F-POND

SAMPLING EVENT:
FEBRUARY 5, 2008

REPORT DATE:
FEBRUARY 20, 2008

TABLE OF CONTENTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

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CASE NARRATIVE

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

To: Earth Tech

Facility: Keystone Steel & Wire Company, Project Number 95150

INORGANICS CASE NARRATIVE

Four groundwater samples and one duplicate sample were received on February 5, 2008 for analysis in accordance with our Level II protocol. The samples arrived in good condition with a cooler temperature of 6°C. The samples were analyzed for Lead, Total and Dissolved (SW-846 Method 6020).

The analyses were performed according to protocol and within the maximum allowable holding times. The samples were analyzed on February 11, 2008 and February 13, 2008.

The matrix spike and matrix spike duplicate analyses were performed on sample Dup-0205.

The recoveries for accuracy and precision were within their required QC limits. Recoveries on the other quality control parameters (blanks, controls, verifications, etc.) were within the required QC limits.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

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COVER PAGE

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

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Form 0

INORGANIC ANALYSIS COVER PAGE

Client Sample ID	Lab Sample ID	Date Collected	Final Date Analyzed
FP-1	08021267-1	05-Feb-08	13-Feb-08
FP-2	08021267-2	05-Feb-08	13-Feb-08
FP-3	08021267-3	05-Feb-08	13-Feb-08
TL-3	08021267-4	05-Feb-08	13-Feb-08
Dup-0205	08021267-5	05-Feb-08	13-Feb-08

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CHAIN OF CUSTODY

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

State where samples collected IL

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT) - (SAMPLE ACCEPTANCE POLICY ON REVERSE)

1			
CLIENT: EARTH TECH (KEYSTONE F-POND)	PROJECT NUMBER: 95150	P.O. NUMBER:	MEANS SHIPPED: HAND DELIVERED
ADDRESS: 5010 STONE MILL ROAD	PHONE NUMBER: 812-336-0972	FAX NUMBER:	DATE SHIPPED: 2-5-08
CITY STATE ZIP: BLOOMINGTON, IN 47409	SAMPLER (PLEASE PRINT): Duwelius		
CONTACT PERSON: Andy Duwelius	SAMPLER'S SIGNATURE: Duwelius		

MATRIX TYPES: WW-WASTEWATER, DW-DRINKING WATER, GW-GROUND WATER, WWSL-SLUDGE, NAS-SOLID, L'CHT-LEACHATE, OTHER:

3 ANALYSIS REQUESTED

4 (FOR LAB USE ONLY)
LOGIN # 08021269-5
LOGGED BY: MP
LAB PROJ. #
TEMPLATE:
PROJ. MGR.:

2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	BOTTLE COUNT	TOTAL LEAD	DISSOLVED LEAD						REMARKS
FP-1	2-5-08	0710	X		GW	2	X	X						
FP-2	2-5-08	0752	X		GW	2	X	X						
FP-3	2-5-08	0739	X		GW	2	X	X						
TL-3	2-5-08	0724	X		GW	2	X	X						
Dup-0205	2-5-08	0730	X		GW	2	X	X						

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) NORMAL RUSH DATE RESULTS NEEDED
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.*

7			
RELINQUISHED BY: (SIGNATURE) John A. Duwelius	DATE 2-5-08 TIME 0837	RECEIVED BY: (SIGNATURE)	DATE TIME
RELINQUISHED BY: (SIGNATURE)	DATE TIME	RECEIVED BY: (SIGNATURE)	DATE TIME
RELINQUISHED BY: (SIGNATURE)	DATE TIME	RECEIVED AT LAB BY: (SIGNATURE) Jerry S Ashley	DATE 2/5/08 TIME @ 0835a

8 COMMENTS: (FOR LAB USE ONLY)
SAMPLE TEMPERATURE UPON RECEIPT 6 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) Y OR N
DATE AND TIME TAKEN FROM SAMPLE BOTTLE

Copies: white should accompany samples to PDC Labs. Yellow copy to be retained by the client.

PAGE 1 OF 1

00000004

TABULATED ANALYTICAL RESULTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404
Attn : Mr. Andy Duwelius

Date Received : 02/05/08 09:35
Report Date 02/20/08
Customer # : 205746
P.O. Number : WN31654
Facility :

Sample No: **08021267-1** Collect Date **02/05/08 07:10**
Client ID : **PROJECT #95150** Site : **FP-1** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			02/11/08 10:00	JEM
SW-846 6020				
Lead		4 ug/l	02/13/08 09:17	JMW
Lead, Dissolved		1.3 ug/l	02/11/08 09:18	JMW

Sample No: **08021267-2** Collect Date **02/05/08 07:52**
Client ID : **PROJECT #95150** Site : **FP-2** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			02/11/08 10:00	JEM
SW-846 6020				
Lead	U	1 ug/l	02/13/08 09:22	JMW
Lead, Dissolved	U	1 ug/l	02/11/08 09:22	JMW

Sample No: **08021267-3** Collect Date **02/05/08 07:39**
Client ID : **PROJECT #95150** Site : **FP-3** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			02/11/08 10:00	JEM
SW-846 6020				
Lead	U	1 ug/l	02/13/08 09:27	JMW
Lead, Dissolved	U	1 ug/l	02/11/08 09:27	JMW

Sample No: **08021267-4** Collect Date **02/05/08 07:24**
Client ID : **PROJECT #95150** Site : **TL-3** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			02/11/08 10:00	JEM
SW-846 6020				
Lead	U	1 ug/l	02/13/08 09:33	JMW
Lead, Dissolved	U	1 ug/l	02/11/08 09:32	JMW

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404
Attn : Mr. Andy Duwelius

Date Received : 02/05/08 09:35
Report Date 02/20/08
Customer # : 205746
P.O. Number : WN31654
Facility :

Sample No: **08021267-5** Collect Date **02/05/08 07:30**
Client ID : **PROJECT #95150** Site : **DUP-0205** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			02/11/08 10:00	JEM
SW-846 6020				
Lead		1.5 ug/l	02/13/08 09:38	JMW
Lead, Dissolved	U	1 ug/l	02/11/08 09:37	JMW

PDC Laboratories participates in the following laboratory accreditation/certification and proficiency programs. Endorsement by the Federal or State Government or their agencies is not implied.

NELAC Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230
State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
Drinking Water Certifications: Indiana (C-IL-040); Kansas (E-10338); Kentucky (90058); Missouri (00870); Wisconsin (998294430)
Wastewater Certifications: Arkansas; Iowa (240); Kansas (E-10338); Wisconsin (99829443)
Hazardous/Solid Waste Certifications: Arkansas; Kansas (E-10338); Wisconsin (998294430)
UST Certification: Iowa (240)

Certified by: Gail Schindler
Gail Schindler, Project Manager

This report shall not be reproduced, except in full, without the written approval of the laboratory.

METALS
QUALITY CONTROL DOCUMENTATION

PDC Laboratories Quality Control Summary Report

PROJECT: 08021267

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
QC CROSS REFERENCE REPORT

Lab ID	Client ID	Prep. Lot	Analysis Lot	Analysis Date	Analyst	Method	Sample Tag
08021267-1	FP-1		WG159220	11-Feb-08 09:18	JMW	SW-846 6020	D10:1
08021267-1	FP-1	WG159276	WG159403	13-Feb-08 09:17	JMW	SW-846 6020	D10:1
08021267-2	FP-2		WG159220	11-Feb-08 09:22	JMW	SW-846 6020	D10:1
08021267-2	FP-2	WG159276	WG159403	13-Feb-08 09:22	JMW	SW-846 6020	D10:1
08021267-3	FP-3		WG159220	11-Feb-08 09:27	JMW	SW-846 6020	D10:1
08021267-3	FP-3	WG159276	WG159403	13-Feb-08 09:27	JMW	SW-846 6020	D10:1
08021267-4	TL-3		WG159220	11-Feb-08 09:32	JMW	SW-846 6020	D10:1
08021267-4	TL-3	WG159276	WG159403	13-Feb-08 09:33	JMW	SW-846 6020	D10:1
08021267-5	DUP-0205		WG159220	11-Feb-08 09:37	JMW	SW-846 6020	D10:1
08021267-5	DUP-0205	WG159276	WG159403	13-Feb-08 09:38	JMW	SW-846 6020	D10:1

METHOD BLANK

Laboratory ID: WG159220-3 Analysis Lot: WG159220 Prep Batch: N/A Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.69J	1.0	11-Feb-08 09:00

Laboratory ID: WG159276-1 Analysis Lot: WG159403 Prep Batch: WG159276 Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	1.0U	1.0	13-Feb-08 09:00

LABORATORY CONTROL SAMPLE

Laboratory ID: WG159220-4 Analysis Lot: WG159220 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	500	480	96.0	80.0-120	11-Feb-08 09:04

Laboratory ID: WG159276-2 Analysis Lot: WG159403 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	556	550	99.0	80.0-120	13-Feb-08 09:04

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Laboratory IDs: WG159220-5, WG159220-6 Analysis Lot: WG159220 Sample Spiked: 08021267-5 Site: DUP-0205 Sample Tag: D10:1

Analyte	Units	Amt MS Spiked	Amt MSD Spiked	Sample Value	MS Value	MSD Value	MS % Rec	MSD % Rec	Rec Limits	RPD	RPD Limits
Lead, Dissolved	UG/L	500	500	0.69	480	480	95.9	95.9	75.0-125	0.00	20.0

00000007

PDC Laboratories Quality Control Summary Report

PROJECT: 08021267

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
INITIAL CALIBRATION VERIFICATION

INITIAL CALIBRATION VERIFICATION

Laboratory ID: WG159220-1 Analysis Lot: WG159220 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25.	24.	96.0	90.0-110	11-Feb-08 08:41

Laboratory ID: WG159403-1 Analysis Lot: WG159403 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25.	25.	100	90.0-110	13-Feb-08 08:46

INITIAL CALIBRATION BLANK

Laboratory ID: WG159220-2 Analysis Lot: WG159220

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.10U	0.10	11-Feb-08 08:56

Laboratory ID: WG159403-2 Analysis Lot: WG159403

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	13-Feb-08 08:38

CONTINUING CALIBRATION BLANK

Laboratory ID: WG159220-8 Analysis Lot: WG159220

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.10U	0.10	11-Feb-08 10:26

Laboratory ID: WG159403-4 Analysis Lot: WG159403

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	13-Feb-08 10:26

CONTINUING CALIBRATION VERIFICATION

Laboratory ID: WG159220-7 Analysis Lot: WG159220 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25	24	96.0	90.0-110	11-Feb-08 10:16

PDC Laboratories Quality Control Summary Report

PROJECT: 08021267

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
CONTINUING CALIBRATION VERIFICATION

Laboratory ID: WG159403-3 Analysis Lot: WG159403 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25	25	100	90.0-110	13-Feb-08 10:16

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

February 26, 2008

LU-9J

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vic Stirnaman
Executive Vice President
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Groundwater Monitoring Letter Report
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Stirnaman

The U.S. EPA has completed the review of your January 14, 2008, Groundwater Monitoring Letter Report at the Keystone Steel and Wire Company. The letter report presents results of the July, August and October 2007groundwater monitoring events at the F-Pond and the North Ditch Staging Area.

As you indicated in the letter report, a replacement monitoring well FP-3 for well TL4-R was installed and sampled. Detection of total lead in the FP-3 well was below the laboratory detection limit of 1 ppb. However, lead levels in FP-1 and W-2 continues to be problematic. The erratic lead levels detected in Well FP-1 from April 2006 through August 2007 would indicate that the implemented remedy at the F-Pond **may not** have completely treated all of the waste streams that were disposed within the F-Pond area. Also the letter report did not explain why well W-2 was not re-sampled during the October sampling episode. In the August sampling, lead was detected in wells W-2 at a concentration of 1.4 ppb, FP-2 at a concentration of 1.5 ppb and FP-1 at a concentration of 10 ppb. In October, only wells FP-1 and FP-2 were re-sampled.

Finally, we agree that Keystone Steel and Wire should continue to monitor the groundwater at the F-Pond for the next two quarters. If at the end of the of these two quarters, any of the wells surrounding the F-Pond continues to exceed, Keystone Steel and Wire must immediately submit a new proposal to address the remaining contamination within the F-Pond area within 30 days of submitting the results from the last quarter of monitoring. The proposal must contain a detail plan describing how Keystone Steel and Wire intends to perform additional waste removal from the F-Pond area in order to address the lead contamination that is continuously been detected in the monitoring wells surrounding the F-Pond.

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If you have any questions, please contact me at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Land and Chemicals Division
Corrective Action Section 2

Cc: Chad Erdmann, KS&W
Cc: Jim Moore, IEPA

ENTACT.
environmental services

January 14, 2008

Mr. Jonathan Adenuga
U.S. EPA Region 5, DE-9J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

RE: Groundwater Monitoring Letter Report
1st and 2nd Quarter FP-3 Monitoring Events
Keystone Steel & Wire Company
7000 SW Adams Street, Peoria, Illinois

Dear Mr. Adenuga:

On behalf of the Keystone Steel & Wire Company ("Keystone"), ENTACT Services LLC ("ENTACT") is submitting this Groundwater Monitoring Letter Report for the 1st and 2nd Quarter FP-3 Monitoring Events. This letter report presents and discusses the groundwater monitoring results from the July 19, 2007, August 2, 2007 and October 31, 2007 monitoring events conducted pursuant to the requirements of corrective action for the groundwater monitoring program at the F-Pond and the North Ditch Staging Area. Specifically, the July monitoring event reports on the sampling results of the newly installed groundwater monitoring well, FP-3, at the F-Pond. The August 2, 2007 monitoring event reports on the sampling results associated with the remainder of the monitoring wells at the F-Pond and North Ditch Staging Area. The October 31, 2007 monitoring event reports only on the sampling results of the F-Pond groundwater monitoring wells.

Monitoring of the FP-3 groundwater monitoring well is required for a period of 1 year after installation to demonstrate the completion of satisfactory remediation of impacted material within the F-Pond. Monitoring of the remainder of the F-Pond and North Ditch Staging Area groundwater monitoring wells in August 2007 was performed to demonstrate completion of the satisfactory remediation of impacted materials within the units. Since suspect constituent concentrations were detected in the F-Pond groundwater monitoring wells during the August 2007 event, an additional groundwater monitoring event was performed in October 2007. The following sections describe the sampling procedures, field parameter results and laboratory analytical results for the July 19, 2007, August 2, 2007 and October 31, 2007 sampling events.

Groundwater Monitoring Events

Groundwater samples were collected by Keystone's groundwater monitoring consultant, EarthTech, from monitoring well FP-3 at the F-Pond on July 19, 2007; from monitoring wells FP-1, FP-2 and TL-3 at the F-Pond and monitoring wells NDSA-1, NDSA-2, T-6A, and W-2 at the North Ditch Staging Area on August 2, 2007; and from monitoring wells FP-1, FP-2, FP-3, and TL-3 at the F-Pond on October 31, 2007. Groundwater monitoring well FP-3 was installed

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www.entact.com

on July 18, 2007 and copies of the boring log and well completion report are included as Attachment 1. Refer to Figure 1 for the location of the monitoring wells.

Development Procedures

The newly installed monitoring well, FP-3, was developed shortly after installation by hand surging and bailing techniques. Development focused on removing sediment introduced into the monitoring well during well installation. The monitoring well was considered developed once the water removed from the well became less turbid. Approximately 15-20 gallons of groundwater was removed from monitoring well FP-3. The development water was containerized and transferred to the groundwater monitoring zone treatment system, which ultimately connects to the facility's wastewater treatment system, for disposal.

Sampling Procedures

Prior to sampling, a water level measurement was taken at the monitoring wells with an electronic water level measuring device to determine the depth to groundwater. A summary of the water level measurements is presented on Table 1 and the groundwater flow direction and elevations are presented on Figures 2 and 3.

After measurement, the monitoring wells were purged and sampled using clean disposable bailers. The depth to groundwater information collected was used to determine the amount of groundwater required to be removed from the well prior to sampling. At least three well volumes were removed by hand bailing prior to collecting a sample.

Groundwater samples were then collected from the monitoring wells and were submitted for laboratory analysis of total and dissolved lead by U.S. EPA Method SW-846 6020. The samples from each monitoring wells were collected in two 500 ml plastic containers and preserved with nitric acid. A 0.45 micron filter was used to filter a separate aliquot sample for dissolved lead. A separate aliquot sample was also collected from the monitoring well for field measurements of temperature, pH, conductivity, and turbidity (see Table 2 for the field parameter results). The samples were placed in a cooler with ice under chain-of-custody. The samples were picked up by a laboratory courier for delivery to PDC Laboratories in Peoria, Illinois. The purge water was containerized and transferred to the groundwater monitoring zone treatment system, which ultimately connects to the facility's wastewater treatment system, for disposal.

Analytical Results

July 19, 2007 Monitoring Event
The laboratory analytical results indicate that a total lead concentration of 1.8 parts per billion

(ppb) was detected in the sample from monitoring well FP-3. The dissolved lead concentration was below the laboratory detection limit of 1 ppb.

August 2, 2007 Monitoring Event
The laboratory analytical results indicate that total and dissolved lead concentrations were below the laboratory detection limit of 1 ppb in monitoring wells NDSA-1, NDSA-2, T-6A, and TL-3. Total lead was detected in monitoring well W-2 at a concentration of 1.4 ppb, in monitoring well FP-2 at a concentration of 1.5 ppb, in the monitoring well FP-2 duplicate sample at a concentration of 15 ppb, and in monitoring well FP-1 at a concentration of 10 ppb. The dissolved lead concentrations associated with these monitoring wells were below the laboratory detection limit of 1 ppb.

The total lead detections observed in monitoring well FP-1 and the duplicate sample from monitoring well FP-2 are considered suspect due to historical concentrations previously detected in these monitoring wells, as well as the parent sample concentration detected in monitoring well FP-2. For this reason, an additional quarterly monitoring event was scheduled for October 2007 to confirm or deny these results.

October 31, 2007 Monitoring Event
The laboratory analytical results indicate that total and dissolved lead concentrations were below the laboratory detection limit of 1 ppb in monitoring wells FP-2, FP-3, and TL-3. Total lead was detected in monitoring well FP-1 at a concentration of 2.3 ppb, with a duplicate sample concentration of 1.3 ppb. The dissolved lead concentration was below the laboratory detection limit of 1 ppb.

The laboratory analytical results for all of the monitoring events are presented on Table 2 and the laboratory analytical reports are included as Attachment 2.

Monitoring Well TL4-R

Pursuant to the Groundwater Monitoring Letter dated February 5, 2007 and U.S. EPA's letter dated April 17, 2007, groundwater monitoring well TL4-R was plugged and abandoned on July 18, 2007. A copy of the plugging report is included as Attachment 3.

Discussion

F-Pond
Per the requirements of Sections 3.2.9 and 3.3.8 of the *Corrective Measures Implementation Workplan, Revision 2* dated April 17, 2006, groundwater monitoring was to be conducted on a quarterly basis for a period of one year. Because detections were noted in monitoring well TL4-R during the year, an additional groundwater monitoring well, FP-3, was installed downgradient

of monitoring well TL4-R outside of the limits of the F-Pond and the Tail Tracks Landfill. This monitoring well is to be monitored on a quarterly basis for a period of one year. Due to the suspect total lead detections in monitoring wells FP-1 and FP-2 during the August 2007 sampling event, Keystone proposes to continue monitoring the F-Pond monitoring wells for 2 quarters in order to demonstrate satisfactory closure of the F-Pond. The next groundwater monitoring event for the F-Pond will be scheduled for late January 2008.

North Ditch Staging Area
Based on the groundwater monitoring results for samples collected from the North Ditch Staging Area, the total and dissolved lead concentrations in the groundwater have decreased and/or stabilized to well below the Illinois EPA Tiered Approach to Corrective Action Objectives standard of 7.5 ppb. As ENTACT discussed with you earlier in the year and pursuant to the requirements of the *Corrective Measures Implementation Workplan, Revision 2.0*, Keystone has demonstrated satisfactory remediation of this unit. With this fact, Keystone proposes to cease groundwater monitoring at the North Ditch Staging Area and plug and abandon monitoring wells NDSA-1 and NDSA-2 (Monitoring wells T-6A and W-2 will not be plugged and abandoned due to their use in the groundwater management zones currently monitored under the supervision of the Illinois EPA).

Conclusion

Keystone will continue to monitor the corrective action groundwater monitoring wells at the F-Pond for two additional quarters. Keystone will cease monitoring and close groundwater monitoring wells (NDSA-1 and NDSA-2) associated with the North Ditch Staging Area corrective action activities.

If you have any questions or issues regarding this addendum, please feel free to contact me at (972) 580-1323 or Chad Erdmann with Keystone at (309) 697-7165.

Respectfully,

Jenny Self
ENTACT Services LLC

Attachments

cc: Chad Erdmann, Keystone Steel & Wire Company
Jim Moore, IEPA
Thad Slaughter, ENTACT Services, LLC

TABLE 1
Water Level Measurements for Groundwater Monitoring Wells
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

Monitoring Well ID No.	Installation/ Sample Date	Ground Elevation (ft amsl)	TOC Elevation (ft amsl)	Standpipe Stickup (+) Stickdown (-)	Depth to Water (ft from gs)	Depth to Water (ft from TOC)	Water Elevation (ft amsl)
F-Pond Monitoring Wells							
FP-1	05/02/06	450.75	453.25	+2.50			
	07/13/06				9.94	12.44	440.81
	10/05/06				10.41	12.91	440.34
	01/16/07				7.48	9.98	443.27
	04/24/07				5.38	7.88	445.37
	08/01/07				5.07	7.57	445.68
	10/31/07				4.93	7.43	445.82
FP-2	05/03/06	443.54	446.04	+2.50			
	07/13/06				4.72	7.22	438.82
	10/05/06				4.37	6.87	439.17
	01/16/07				0.71	3.21	442.83
	04/24/07				3.59	6.09	439.95
	08/01/07				4.38	6.88	439.16
	10/31/07				4.07	6.57	439.47
FP-3	07/18/07	442.87	446.45	+3.58			
	07/19/07				-0.55	3.03	443.42
	8/1/2007				-0.17	3.41	443.04
	10/31/07				-0.19	3.39	443.06
TL-3	09/18/01	444.01	446.60	+2.59			
	11/28/06				2.55	5.14	441.46
	01/16/07				-1.03	1.56	445.04
	04/24/07				1.40	3.99	442.61
	08/01/07				1.93	4.52	442.08
	10/31/07				1.73	4.32	442.28
TL4-R	05/03/06	448.95	451.45	+2.50			
	07/13/06				9.53	12.03	439.42
	10/05/06				9.55	12.05	439.40
	01/16/07				6.07	8.57	442.88
	04/25/07				6.83	9.33	442.12
	07/18/07	MW was plugged and abandoned.					
North Ditch Staging Area Monitoring Wells							
NDSA-1	05/02/06	449.67	449.67	-0.32			
	07/13/06				9.40	9.08	440.59
	10/05/06				9.87	9.55	440.12
	01/16/07				7.37	7.05	442.62
	04/24/07				6.95	6.63	443.04
	08/01/07				8.52	8.20	441.47
NDSA-2	05/02/06	448.62	448.62	-0.30			
	07/13/06				10.17	9.87	438.75
	10/05/06				8.64	8.34	440.28
	01/16/07				11.38	11.08	437.54
	04/24/07				9.09	8.79	439.83
	08/01/07				13.31	13.01	
T-6A	11/06/89	449.10	451.67	+2.57			

TABLE 1
Water Level Measurements for Groundwater Monitoring Wells
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

Monitoring Well ID No.	Installation/ Sample Date	Ground Elevation (ft amsl)	TOC Elevation (ft amsl)	Standpipe Stickup (+) Stickdown (-)	Depth to Water (ft from gs)	Depth to Water (ft from TOC)	Water Elevation (ft amsl)
T-6A	07/13/06				8.30	10.87	440.80
	10/05/06				8.72	11.29	440.38
	01/16/07				5.98	8.55	443.12
	04/24/07				5.94	8.51	443.16
	08/01/07				7.74	10.31	441.36
W-2	01/15/86	448.60	451.79	+3.19			
	07/13/06				9.61	12.80	438.99
	10/05/06				9.73	12.92	438.87
	01/16/07				5.79	8.98	442.81
	04/24/07				6.44	9.63	442.16
	08/01/07				8.25	11.44	440.35

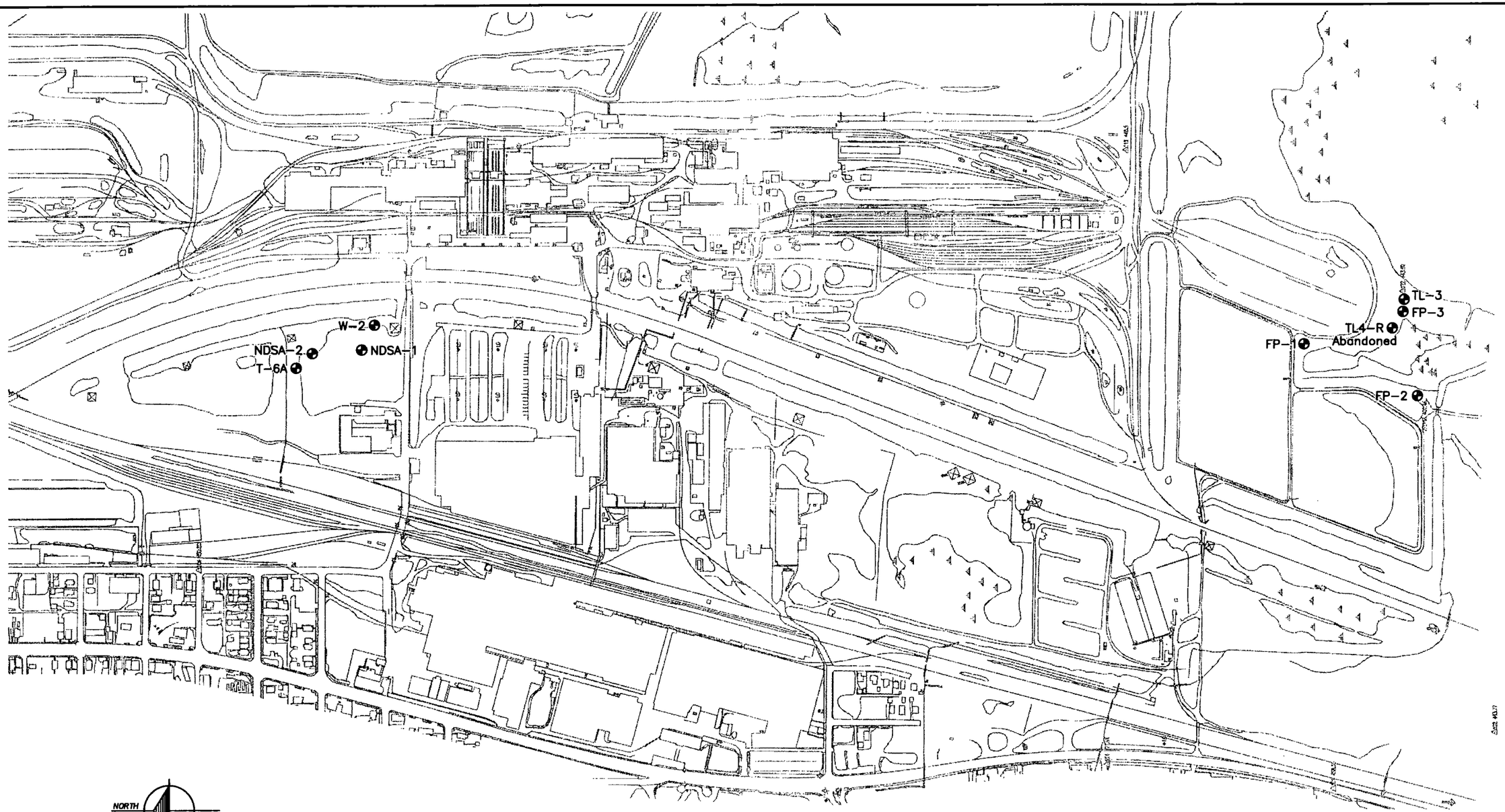
TABLE 2
Field Parameter and Laboratory Analytical Results for Groundwater Samples
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

MW ID No.	Sample Date	Total Lead (ug/l)	Dissolved Lead (ug/l)	pH (s.u.)	Conductivity (mS/cm)	Turbidity (NTU)	Temperature (°C)	Comments
F-Pond Monitoring Wells								
FP-1	07/13/06	13	<5	7.58	1.940	175	21.10	
	10/06/06	6.6	<5	7.43	1.560	9	15.10	
	01/17/07	6.6	<5	7.00	1.450	15	11.10	
	04/25/07	3	<1	6.88	1.640	10	11.19	
	08/02/07	10*	<1	6.91	1.560	11.6	25.89	
	10/31/07	2.3	<1	6.80	1.480	17.8	15.79	
	10/31/07	1.3	<1	7.33	1.470	14	16.53	Duplicate
FP-2	07/13/06	<5	<5	6.05	2.270	118	20.30	
	10/06/06	<5	<5	6.65	2.060	6	15.10	
	10/06/06	<5	<5	6.71	2.020	9	15.90	Duplicate
	01/17/07	<5	<5	6.30	1.700	1	7.20	
	01/17/07	<5	<5	6.30	1.700	1	7.20	Duplicate
	04/25/07	<1	<1	6.59	2.070	9.8	10.36	
	08/02/07	1.5	<1	6.58	2.080	45.2	17.13	
	08/02/07	15*	<1	6.52	2.080	47.8	16.95	Duplicate
	10/31/07	<1	<1	6.23	2.120	23.6	15.78	
FP-3	07/19/07	1.8	<1	6.11	1.680	127	16.50	
	10/31/07	<1	<1	6.65	1.600	8.5	14.28	
TL-3	11/29/06	<5	<5	7.23	1.960	114	17.09	
	01/17/07	<5	<5	9.21	1.710	14	3.50	
	04/25/07	1.5	<1	6.57	2.650	56	11.79	
	08/02/07	<1	<1	6.94	1.570	24.2	19.68	
	10/31/07	<1	<1	6.61	1.710	12.9	14.52	
TLR-4	07/13/06	11000	8800	11.41	5.430	120	21.40	
	10/06/06	17000	18000	12.49	4.400	17	17.00	
	01/17/07	470	200	12.22	1.740	0	9.60	
	04/25/07	No sample collected - MW to be plugged and abandoned.						
	07/18/07	MW was plugged and abandoned.						
North Ditch Staging Area Monitoring Wells								
NDSA-1	07/13/06	<5	<5	5.46	0.950	15	20.30	
	10/06/06	<5	<5	6.52	0.944	11	17.10	
	01/17/07	<5	<5	5.87	0.819	11	11.80	
	04/25/07	<1	<1	6.56	0.866	24	11.75	
	04/25/07	1	<1	6.32	0.866	23	11.76	Duplicate
	08/02/07	<1	<1	6.25	0.854	30	17.78	
NDSA-2	07/13/06	<5	<5	5.98	0.990	3	20.30	
	10/06/06	<5	<5	6.75	0.934	6	16.70	
	01/17/07	<5	<5	6.26	0.905	0	10.90	
	04/25/07	<1	<1	6.69	1.199	12	10.13	
	08/02/07	<1	<1	6.41	0.977	4.4	17.20	
T-6A	07/13/06	<5	<5	5.67	1.290	15	19.00	
	07/13/06	<5	<5	5.57	1.320	26	19.70	Duplicate
	10/06/06	<5	<5	6.67	1.180	11	15.40	

TABLE 2
Field Parameter and Laboratory Analytical Results for Groundwater Samples
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

MW ID No.	Sample Date	Total Lead (ug/l)	Dissolved Lead (ug/l)	pH (s.u.)	Conductivity (mS/cm)	Turbidity (NTU)	Temperature (°C)	Comments
T-6A	01/17/07	<5	<5	6.25	1.050	7	10.90	
	04/25/07	<1	<1	6.42	1.280	22	11.22	
	08/02/07	<1	<1	6.37	1.225	24	16.80	
W-2	07/13/06	<5	<5	5.81	1.450	106	20.30	
	10/06/06	6.5	<5	7.22	1.340	8	15.10	
	01/17/07	<5	<5	6.32	1.140	0	11.40	
	04/25/07	<1	<1	6.55	1.315	24	10.54	
	08/02/07	1.4	<1	6.34	1.355	42.2	18.61	

Notes:
<: Less than the detection limit



NORTH

0 250 500 1000
Scale in Feet

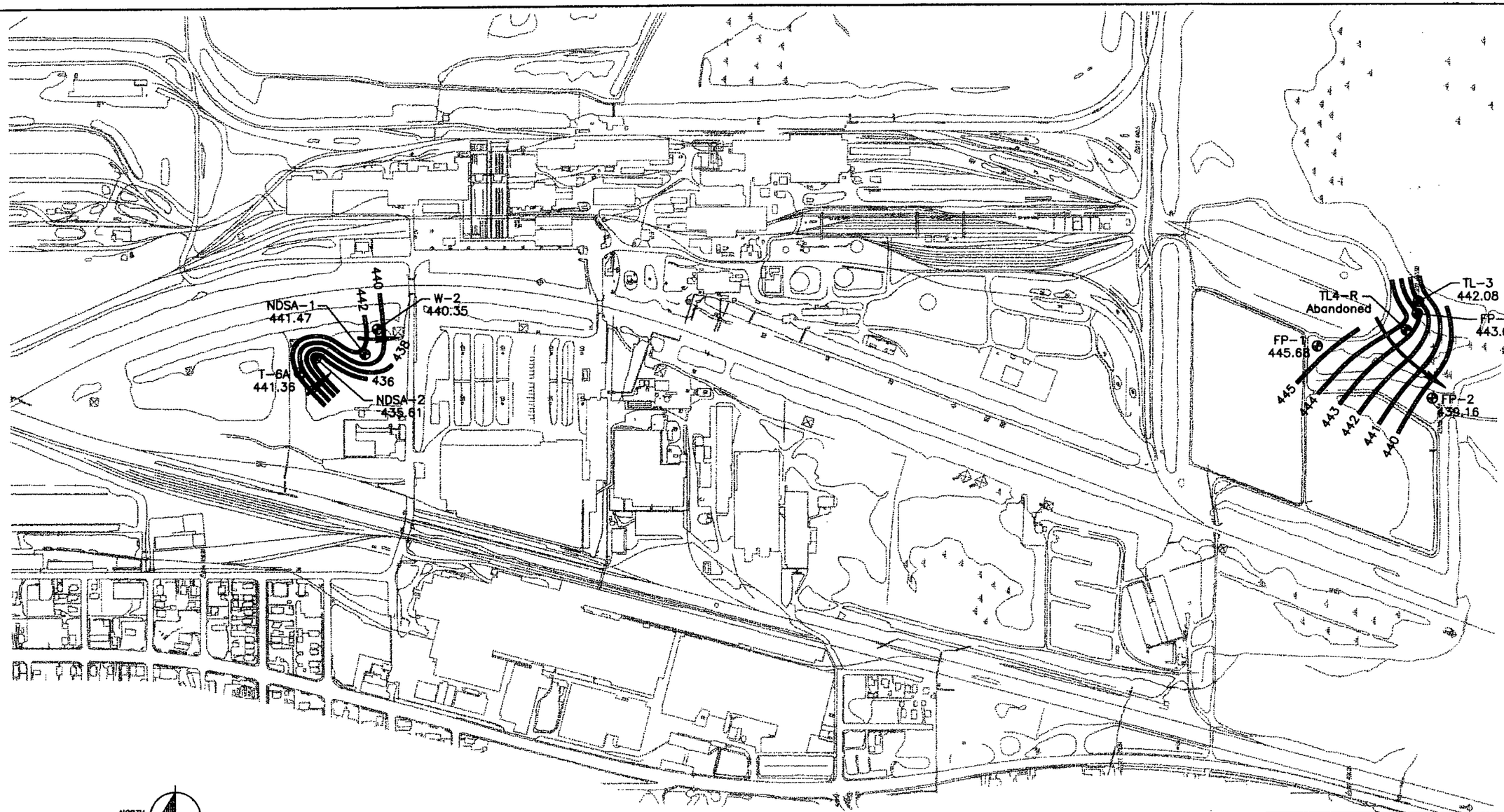
Legend
Monitoring Well Location

MONITORING WELL LOCATION MAP

KEYSTONE STEEL & WIRE CO.
PEORIA, ILLINOIS

Date 10-07	EarthTech	Figure
Project No. 95150	A tyco International Ltd. Company	1

L:\work\95150\Dwg\MW Location Map.dwg 10/08/07 4:00 PM nancy.wilzbacher



Legend

- Monitoring Well
- 445.68 Ground Water Elevation (Feet AMSL)
- 445 Potentiometric Surface Contour
- Ground Water Flow Direction

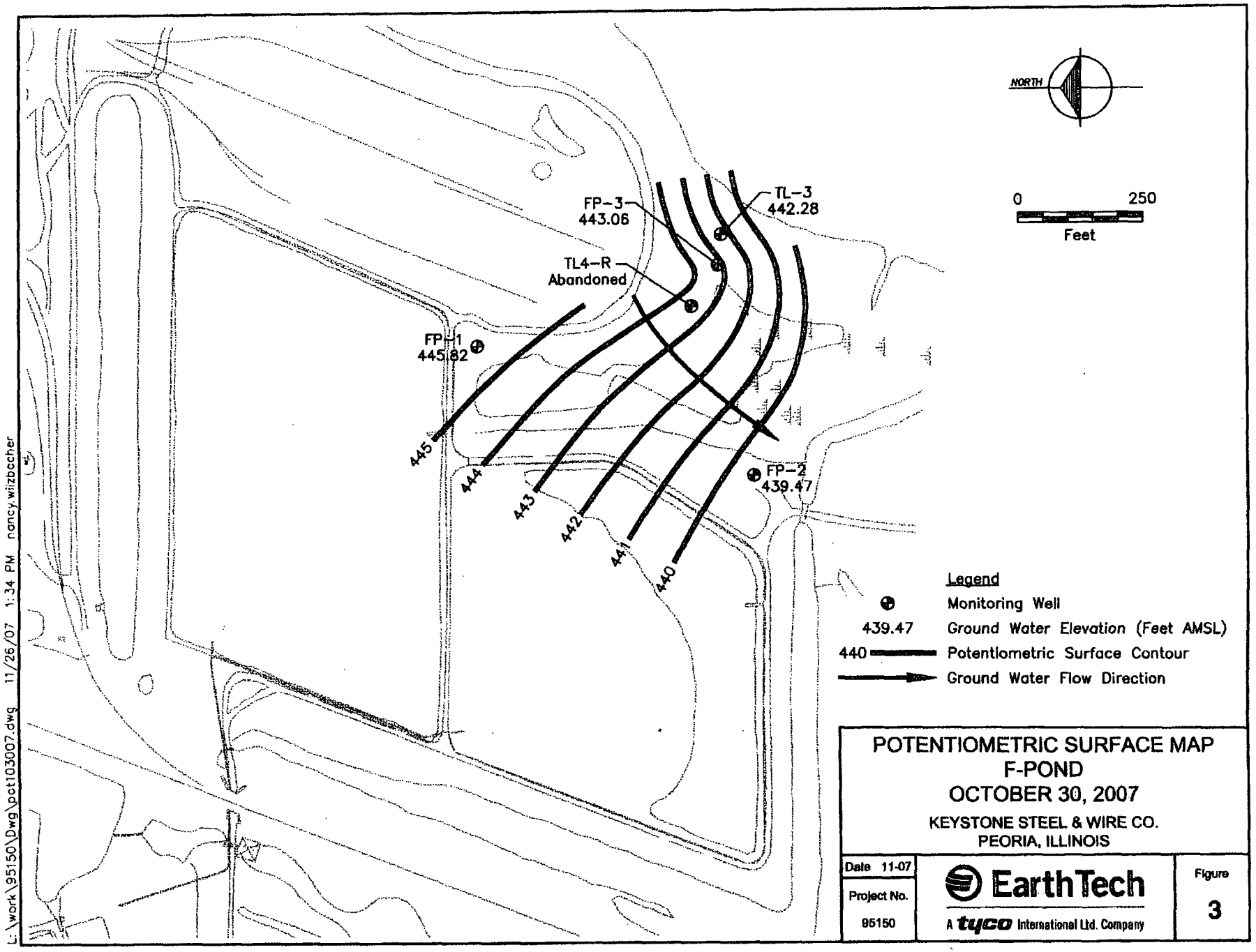
0 250 500 1000
Scale In Feet

POTENTIOMETRIC SURFACE MAP
F-POND AND
NORTH DITCH STAGING AREA
AUGUST 1, 2007

KEYSTONE STEEL & WIRE CO.
PEORIA, ILLINOIS

Date 09-07	EarthTech	Figure
Project No. 95150	A tyco International Ltd. Company	2

L:\work\95150\Dwg\pot080107.dwg 09/25/07 11:24 AM nancy.wilzbacher



L:\work\95150\Dwg\pct103007.dwg 11/26/07 1:34 PM nancy.wilzbacher

ATTACHMENT 1

BORING LOG AND WELL COMPLETION REPORT

Illinois Environmental Protection Agency — Field Boring Log

Site File No. 1430050001 County Peoria Boring No. FP-3 Monitor Well No. FP-3

Site File Name Keystone Steel & Wire Company Surface Elevation 442.87 ft. Completion Depth 11.22

Fed. ID. No. ILD000714881 Auger Depth 11.50 ft. Rotary Depth NA

Quadrangle Peoria West Sec. 36 T. 8N R. 7E Date: Start 7/18/07 Finish 7/18/07

Site Coord. N.(X) 14996.91 E.(Y) 9495.87

Latitude ___ ° ___ ' ___ " Longitude ___ ° ___ ' ___ "

Boring Location

Drilling Equipment Geoprobe 6110 DT

PERSONNEL: G - J.A. Duwelius; D - J. Upcraft; H - ; H -

Elev.	DESCRIPTION OF MATERIALS	Graphic Log	Depth in feet	SAMPLE NO.	SAMPLE TYPE	SAMPLE RECOVERY (%)	PENETROMETER	N VALUES (BLOW COUNTS)	OVA or HNU READINGS	REMARKS
	Silty clay loam, very dark brown (10YR 2/2), color change @ 1.5' to dark brown, wet, slightly plastic, contains organic material, noncalcareous, clear contact @ 4.0' to					4				
445.5			1							
444.5			2							
443.5			3							
442.5	Loamy sand, medium-fine, grayish brown (10YR 5/2), wet, nonplastic, noncalcareous		4			4				
441.5			5							
440.5			6							
439.5			7							
438.5			8			4				
437.5			9							
436.5			10							

(950226)

Illinois Environmental Protection Agency — Field Boring Log

Site File No. 1430050001 County Peoria Boring No. FP-3 Monitor Well No. FP-3

Site File Name Keystone Steel & Wire Company Surface Elevation 442.87 ft. Completion Depth 11.22

Fed. ID. No. ILD000714881 Auger Depth 11.50 ft. Rotary Depth NA

Quadrangle Peoria West Sec. 36 T. 8N R. 7E Date: Start 7/18/07 Finish 7/18/07

Site Coord. N.(X) 14996.91 E.(Y) 9495.87

Latitude ___° ___' ___" Longitude ___° ___' ___"

Boring Location

Drilling Equipment Geoprobe 6110 DT

PERSONNEL
G - J.A. Duwelius
D - J. Upcraft
H -
H -

Elev.	DESCRIPTION OF MATERIALS	Graphic Log	Depth in feet	SAMPLES: SAMPLE NO.	SAMPLE TYPE	SAMPLE RECOVERY (%)	PENETROMETER	N VALUES (BLOW COUNTS)	OVA or HNU READINGS	REMARKS
										Total depth 12.0'

(950226)

Illinois Environmental Protection Agency — Well Completion Report

SITE #: 1430050001 COUNTY: Peoria WELL #: FP-3

SITE NAME: Keystone Steel & Wire Company BOREHOLE #: FP-3

SITE GRID COORDINATE: X 9495.87 Y 14996.91 (or) LATITUDE ___° ___' ___" LONGITUDE ___° ___' ___"

SURVEYED BY: Forth Infrastructure & Environment, LLC ILL. REGISTRATION #: NA

DRILLING CONTRACTOR: Innovative Probing Solutions DRILLER: J. Upcraft

CONSULTING FIRM: Earth Tech GEOLOGIST: J.A. Duwelius

DRILLING METHOD: HSA 8 1/4" OD; 4 1/4" ID DRILLING FLUIDS (TYPE): None

LOGGED BY: J.A. Duwelius DATE STARTED: 7/18/07 DATE FINISHED: 7/18/07

REPORT FORM COMPLETED BY: J.A. Duwelius DATE: 9/21/07

ANNULAR SPACE DETAILS

TYPE OF SURFACE SEAL: Concrete

TYPE OF ANNULAR SEALANT: Bentonite

INSTALLATION METHOD: Pour

SETTING TIME: ___

TYPE OF BENTONITE SEAL - GRANULAR [PELLET] SLURRY (CIRCLE ONE)

INSTALLATION METHOD: Pour

SETTING TIME: ___

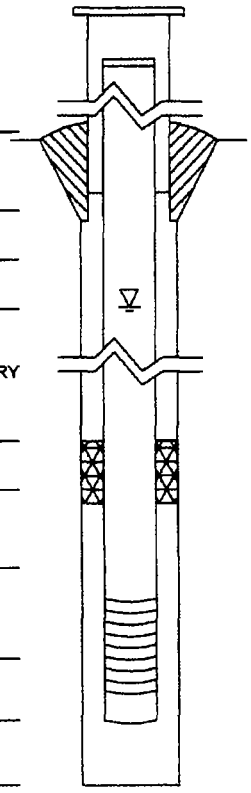
TYPE OF SAND PACK: Silica Sand #5

GRAIN SIZE: ___ (SIEVE SIZE)

INSTALLATION METHOD: Pour

TYPE OF BACKFILL MATERIAL: NA (IF APPLICABLE)

INSTALLATION METHOD: NA



	ELEVATIONS (MSL)*	DEPTHS (BGS) (.01 ft)
TOP OF PROTECTIVE CASING		NA
TOP OF RISER PIPE	446.45	-3.58
GROUND SURFACE	442.87	0.00
TOP OF ANNULAR SEALANT	440.87	2.00
STATIC WATER LEVEL (AFTER COMPLETION)	443.15	-0.28
TOP OF SEAL	440.87	2.00
TOP OF SANDPACK	438.77	4.10
TOP OF SCREEN	436.71	6.16
BOTTOM OF SCREEN	431.99	10.88
BOTTOM OF WELL	431.65	11.22
BOTTOM OF BOREHOLE	431.37	11.50

* REFERENCED TO A NATIONAL GEODETIC VERTICAL DATUM

WELL CONSTRUCTION MATERIALS (CIRCLE ONE)

PROTECTIVE CASING	SS304	SS316	PTFE	[PVC]	OTHER:
RISER PIPE ABOVE W.T.	SS304	SS316	PTFE	[PVC]	OTHER:
RISER PIPE BELOW W.T.	SS304	SS316	PTFE	[PVC]	OTHER:
SCREEN	SS304	SS316	PTFE	[PVC]	OTHER:

CASING MEASUREMENTS

DIAMETER OF BOREHOLE	(in)	8.5
ID OF RISER PIPE	(in)	2.0
PROTECTIVE CASING LENGTH	(ft)	5.0
RISER PIPE LENGTH	(ft)	9.74
BOTTOM OF SCREEN TO END CAP	(ft)	0.34
SCREEN LENGTH (1st SLOT TO LAST SLOT)	(ft)	4.72
TOTAL LENGTH OF CASING	(ft)	14.80
SCREEN SLOT SIZE **	(in)	0.010

**HAND-SLOTTED WELL SCREENS ARE UNACCEPTABLE

(941014)

ATTACHMENT 2

LABORATORY ANALYTICAL REPORTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

August 1, 2007

Mr. Andy Duwelius
Earth Tech
5010 Stone Mill Road
Bloomington, IN 47408

Dear Mr. Duwelius:

Enclosed is the quality control deliverables for the July 19, 2007 groundwater sampling of FP-3 at Keystone Steel & Wire F-Pond. If you have any questions, please call.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

XC: Mr. Chad Erdman, Keystone Steel & Wire Co.

recycled paper

EARTH TECH
BLOOMINGTON, IN

KEYSTONE STEEL & WIRE CO.
F-POND FP-3

SAMPLING EVENT:
JULY 19, 2007

REPORT DATE:
AUGUST 1, 2007

TABLE OF CONTENTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH

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CASE NARRATIVE

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

To: Earth Tech

Facility: Keystone Steel & Wire Company, Project Number 95150.04

INORGANICS CASE NARRATIVE

One groundwater sample was received on July 19, 2007 for analysis in accordance with our Level II protocol. The sample arrived in good condition with a cooler temperature of 11°C. The sample was analyzed for Lead, Total and Dissolved (SW-846 Method 6020).

The analysis was performed according to protocol and within the maximum allowable holding times. The sample was analyzed on July 25, 2007 and July 26, 2007.

No matrix spike and matrix spike duplicate analyses was performed on this sample data group. The recoveries for accuracy and precision were within their required QC limits. Recoveries on the other quality control parameters (blanks, controls, verifications, etc.) were within the required QC limits.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

COVER PAGE

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

Form 0

INORGANIC ANALYSIS COVER PAGE

Client Sample ID	Lab Sample ID	Date Collected	Final Date Analyzed
FP-3	07073237-1	19-Jul-07	26-Jul-07

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CHAIN OF CUSTODY

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

State where samples collected IL

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT) - (SAMPLE ACCEPTANCE POLICY ON REVERSE)

1			
CLIENT: EARTH TECH / KEYSTONE	PROJECT NUMBER: 95150.04	P.O. NUMBER:	MEANS SHIPPED: DECIVELED
ADDRESS: 5010 STONE MILL RD	PHONE NUMBER: 812-336-0972	FAX NUMBER:	DATE SHIPPED: 7-19-07
CITY STATE ZIP: Bloomington, IN 47408	SAMPLER (PLEASE PRINT):		MATRIX TYPES: WW-WASTEWATER, DW-DRINKING WATER, GW-GROUND WATER, WWSL-SLUDGE, NAS-SOLID, L'CHT-LEACHATE, OTHER:
CONTACT PERSON: Andy Duwelius	SAMPLER'S SIGNATURE:		

3 ANALYSIS REQUESTED

4 (FOR LAB USE ONLY)
LOGIN #: 07732371
LOGGED BY:
LAB PROJ.:
TEMPLATE:
PROJ. MGR.:

2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	BOTTLE COUNT	TOTAL LEAD	DISS. LEAD						REMARKS
FP-3	7-19-07	0930	X		GW	2	X	X						

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) NORMAL RUSH DATE RESULTS NEEDED
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.*

7			
RELINQUISHED BY: (SIGNATURE) J.A. Duwelius	DATE 7-19-07 TIME 1003	RECEIVED BY: (SIGNATURE)	DATE TIME
RELINQUISHED BY: (SIGNATURE)	DATE TIME	RECEIVED BY: (SIGNATURE)	DATE TIME
RELINQUISHED BY: (SIGNATURE)	DATE TIME	RECEIVED AT LAB BY: (SIGNATURE) Gina Peters	DATE 7/19/07 TIME 10:03

8 COMMENTS: (FOR LAB USE ONLY)
SAMPLE TEMPERATURE UPON RECEIPT 11 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) Y OR N
(EXCLUDES TYPICAL FIELD PARAMETERS)
DATE AND TIME TAKEN FROM SAMPLE BOTTLE

Copies: white should accompany samples to PDC Labs. Yellow [illegible] to be retained by the client.

PAGE ____ OF ____

00000004

TABULATED ANALYTICAL RESULTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404
Attn : Mr. Andy Duwelius

Date Received : 07/19/07 10:03
Report Date 07/31/07
Customer # : 205746
P.O. Number : WN31654
Facility :

Sample No: **07073237-1** Collect Date **07/19/07 09:30**
Client ID : **PROJECT #95150.04** Site : **FP-3** Locator : **KEYSTONE**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			07/23/07 11:45	LMR
SW-846 6020				
Lead		1.8 ug/l	07/26/07 12:11	JMW
Lead, Dissolved	U	1 ug/l	07/25/07 10:50	JMW

PDC Laboratories participates in the following laboratory accreditation/certification and proficiency programs. Endorsement by the Federal or State Government or their agencies is not implied.

NELAC Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230
State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
Drinking Water Certifications: Indiana (C-IL-040); Kansas (E-10338); Kentucky (90058); Missouri (00870); Wisconsin (998294430)
Wastewater Certifications: Arkansas; Iowa (240); Kansas (E-10338); Wisconsin (99829443)
Hazardous/Solid Waste Certifications: Arkansas; Kansas (E-10338); Wisconsin (998294430)
UST Certification: Iowa (240)

Certified by: Gail A Schindler
Gail Schindler, Project Manager

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METALS
QUALITY CONTROL DOCUMENTATION

PDC Laboratories Quality Control Summary Report

PROJECT: 07073237

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
QC CROSS REFERENCE REPORT

Lab ID	Client ID	Prep. Lot	Analysis Lot	Analysis Date	Analyst	Method	Sample Tag
07073237-1			WG147222	25-Jul-07 10:50	JMW	SW-846 6020	D10:1
07073237-1			WG147330	26-Jul-07 12:11	JMW	SW-846 6020	D10:1

METHOD BLANK

Laboratory ID: WG147074-1 Analysis Lot: WG147330 Prep Batch: N/A Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	1.0U	1.0	26-Jul-07 10:36

Laboratory ID: WG147222-3 Analysis Lot: WG147222 Prep Batch: N/A Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.18J	1.0	25-Jul-07 10:40

LABORATORY CONTROL SAMPLE

Laboratory ID: WG147074-2 Analysis Lot: WG147330 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	556	640	115	80.0-120	26-Jul-07 10:40

Laboratory ID: WG147222-4 Analysis Lot: WG147222 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	500	520	104	80.0-120	25-Jul-07 10:26

INITIAL CALIBRATION VERIFICATION

Laboratory ID: WG147222-1 Analysis Lot: WG147222 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25.0	26.	104	90.0-110	25-Jul-07 09:41

Laboratory ID: WG147330-1 Analysis Lot: WG147330 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25.0	26.	104	90.0-110	26-Jul-07 10:22

PROJECT: 07073237

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
INITIAL CALIBRATION BLANK

INITIAL CALIBRATION BLANK

Laboratory ID: WG147222-2 Analysis Lot: WG147222

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.080J	0.10	25-Jul-07 09:51

Laboratory ID: WG147330-2 Analysis Lot: WG147330

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	26-Jul-07 10:32

CONTINUING CALIBRATION BLANK

Laboratory ID: WG147222-6 Analysis Lot: WG147222

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.10U	0.10	25-Jul-07 11:05

Laboratory ID: WG147330-4 Analysis Lot: WG147330

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	26-Jul-07 12:07

Laboratory ID: WG147330-6 Analysis Lot: WG147330

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	26-Jul-07 13:26

CONTINUING CALIBRATION VERIFICATION

Laboratory ID: WG147222-5 Analysis Lot: WG147222 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25	26	104	90.0-110	25-Jul-07 10:55

Laboratory ID: WG147330-3 Analysis Lot: WG147330 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25	27	108	90.0-110	26-Jul-07 11:50

PDC Laboratories Quality Control Summary Report

PROJECT: 07073237

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
CONTINUING CALIBRATION VERIFICATION

Laboratory ID: WG147330-5 Analysis Lot: WG147330 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25	25	100	90.0-110	26-Jul-07 13:16

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

August 16, 2007

Mr. Andy Duwelius
Earth Tech
5010 Stone Mill Road
Bloomington, IN 47408

Dear Mr. Duwelius:

Enclosed is the quality control deliverables for the August 2, 2007 groundwater sampling of Keystone Steel & Wire F-Pond. If you have any questions, please call.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

XC: Mr. Chad Erdman, Keystone Steel & Wire Co.

recycled paper

EARTH TECH
BLOOMINGTON, IN

KEYSTONE STEEL & WIRE CO.
F-POND

SAMPLING EVENT:
AUGUST 2, 2007

REPORT DATE:
AUGUST 16, 2007

TABLE OF CONTENTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

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CASE NARRATIVE

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

To: Earth Tech

Facility: Keystone Steel & Wire Company, Project Number 95150

INORGANICS CASE NARRATIVE

Seven groundwater samples and one duplicate sample were received on August 2, 2007 for analysis in accordance with our Level II protocol. The sample arrived in good condition with a cooler temperature of 11°C. The sample was analyzed for Lead, Total and Dissolved (SW-846 Method 6020).

The analyses were performed according to protocol and within the maximum allowable holding times. The samples were analyzed on August 8, 2007 and August 15, 2007.

The matrix spike and matrix spike duplicate analyses was performed on TL-3. The recoveries for accuracy and precision were within their required QC limits. Recoveries on the other quality control parameters (blanks, controls, verifications, etc.) were within the required QC limits.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

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COVER PAGE

PDC Laboratories, Inc.
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(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

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Form 0

INORGANIC ANALYSIS COVER PAGE

Client Sample ID	Lab Sample ID	Date Collected	Final Date Analyzed
W-2	07081334-1	02-Aug-07	15-Aug-07
NSDA-1	07081334-2	02-Aug-07	15-Aug-07
NSDA-2	07081334-3	02-Aug-07	15-Aug-07
T-6A	07081334-4	02-Aug-07	15-Aug-07
FP-1	07081334-5	02-Aug-07	15-Aug-07
TL-3	07081334-6	02-Aug-07	15-Aug-07
FP-2	07081334-7	02-Aug-07	15-Aug-07
FP-2 DUP	07081334-8	02-Aug-07	15-Aug-07

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CHAIN OF CUSTODY

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

State where samples collected IL

F-POND/NDSA

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT) - (SAMPLE ACCEPTANCE POLICY ON REVERSE)

1			
CLIENT: EARTH TECH (KEYSTONE)	PROJECT NUMBER: 95150	P.O. NUMBER:	MEANS SHIPPED: DROP-OFF
ADDRESS: 5010 STONE MILL ROAD	PHONE NUMBER: 812-336-0972	FAX NUMBER: 812-336-3991	DATE SHIPPED:
CITY STATE ZIP: BLOOMINGTON, IN 47408	SAMPLER (PLEASE PRINT): BRYAN / Duwelius		
CONTACT PERSON: ANDY Duwelius	SAMPLER'S SIGNATURE:		

MATRIX TYPES: WW-WASTEWATER, DW-DRINKING WATER, GW-GROUND WATER, WWSL-SLUDGE, NAS-SOLID, L'CHT-LEACHATE, OTHER:

3 ANALYSIS REQUESTED

4 (FOR LAB USE ONLY)
LOGIN # 07081334-8
LOGGED BY: DMK
LAB PROJ. #
TEMPLATE:
PROJ. MGR.:

2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	BOTTLE COUNT	TOTAL LEAD	DISSOLVED LEAD		REPORTING LIMIT	<5.0m			REMARKS
W-2	8-2-07	0730	X		GW	2	X	X						
NSDA-1	8-2-07	0739	X		GW	2	X	X						
NSDA-2	8-2-07	0743	X		GW	2	X	X						
T-6A	8-2-07	0749	X		GW	2	X	X						
FP-1	8-2-07	0812	X		GW	2	X	X						
TL-3	8-2-07	0822	X		GW	2	X	X						
FP-2	8-2-07	0832	X		GW	2	X	X						
FP-2 Dup	8-2-07	0832	X		GW	2	X	X						

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) NORMAL RUSH DATE RESULTS NEEDED
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.*

7			
RELINQUISHED BY: (SIGNATURE) J. A. Duwel	DATE 8-2-07 TIME 1010	RECEIVED BY: (SIGNATURE)	DATE TIME
RELINQUISHED BY: (SIGNATURE)	DATE TIME	RECEIVED BY: (SIGNATURE)	DATE TIME
RELINQUISHED BY: (SIGNATURE)	DATE TIME	RECEIVED AT LAB BY: (SIGNATURE) Brenda Lane	DATE 8-2-07 TIME 10:00

8 COMMENTS: (FOR LAB USE ONLY)
SAMPLE TEMPERATURE UPON RECEIPT 1! °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) Y OR N
(EXCLUDES TYPICAL FIELD PARAMETERS)
DATE AND TIME TAKEN FROM SAMPLE BOTTLE

Copies: white should accompany samples to PDC Labs. Yellow [illegible]y to be retained by the client.

PAGE ____ OF ____

TABULATED ANALYTICAL RESULTS

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404
Attn : Mr. Andy Duwelius

Date Received : 08/02/07 10:00
Report Date 08/15/07
Customer # : 205746
P.O. Number : WN31654
Facility :

Sample No: **07081334-1** Collect Date **08/02/07 07:30**
Client ID : **PROJ #95150** Site : **W-2** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			08/07/07 10:00	DAB
SW-846 6020				
Lead		1.4 ug/l	08/08/07 07:03	JMW
Lead, Dissolved	U	1 ug/l	08/15/07 06:14	JMW

Sample No: **07081334-2** Collect Date **08/02/07 07:39**
Client ID : **PROJ #95150** Site : **NSDA-1** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			08/07/07 10:00	DAB
SW-846 6020				
Lead	U	1 ug/l	08/08/07 07:08	JMW
Lead, Dissolved	U	1 ug/l	08/15/07 06:16	JMW

Sample No: **07081334-3** Collect Date **08/02/07 07:43**
Client ID : **PROJ #95150** Site : **NSDA-2** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			08/07/07 10:00	DAB
SW-846 6020				
Lead	U	1 ug/l	08/08/07 07:14	JMW
Lead, Dissolved	U	1 ug/l	08/15/07 06:19	JMW

Sample No: **07081334-4** Collect Date **08/02/07 07:49**
Client ID : **PROJ #95150** Site : **T-6A** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			08/07/07 10:00	DAB
SW-846 6020				
Lead	U	1 ug/l	08/08/07 07:19	JMW
Lead, Dissolved	U	1 ug/l	08/15/07 06:22	JMW

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404
Attn : Mr. Andy Duwelius

Date Received : 08/02/07 10:00
Report Date 08/15/07
Customer # : 205746
P.O. Number : WN31654
Facility :

Sample No: **07081334-5** Collect Date **08/02/07 08:12**
Client ID : **PROJ #95150** Site : **FP-1** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			08/07/07 10:00	DAB
SW-846 6020				
Lead		10 ug/l	08/08/07 07:24	JMW
Lead, Dissolved	U	1 ug/l	08/15/07 06:25	JMW

Sample No: **07081334-6** Collect Date **08/02/07 08:22**
Client ID : **PROJ #95150** Site : **TL-3** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			08/07/07 10:00	DAB
SW-846 6020				
Lead	U	1 ug/l	08/08/07 07:29	JMW
Lead, Dissolved	U	1 ug/l	08/15/07 06:28	JMW

Sample No: **07081334-7** Collect Date **08/02/07 08:32**
Client ID : **PROJ #95150** Site : **FP-2** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			08/07/07 10:00	DAB
SW-846 6020				
Lead		1.5 ug/l	08/08/07 07:35	JMW
Lead, Dissolved	U	1 ug/l	08/15/07 06:44	JMW

Sample No: **07081334-8** Collect Date **08/02/07 08:32**
Client ID : **PROJ #95150** Site : **FP-2 DUP** Locator : **GRAB**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			08/07/07 10:00	DAB
SW-846 6020				
Lead		15 ug/l	08/08/07 07:40	JMW
Lead, Dissolved	U	1 ug/l	08/15/07 06:47	JMW

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404
Attn : Mr. Andy Duwelius

Date Received : 08/02/07 10:00
Report Date 08/15/07
Customer # : 205746
P.O. Number : WN31654
Facility :

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NELAC Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230
State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
Drinking Water Certifications: Indiana (C-IL-040); Kansas (E-10338); Kentucky (90058); Missouri (00870); Wisconsin (998294430)
Wastewater Certifications: Arkansas; Iowa (240); Kansas (E-10338); Wisconsin (99829443)
Hazardous/Solid Waste Certifications: Arkansas; Kansas (E-10338); Wisconsin (998294430)
UST Certification: Iowa (240)

Certified by: Gail J. Schindler
Gail Schindler, Project Manager

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07081334

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METALS
QUALITY CONTROL DOCUMENTATION

PDC Laboratories Quality Control Summary Report

PROJECT: 07081334

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
QC CROSS REFERENCE REPORT

Lab ID	Client ID	Prep. Lot	Analysis Lot	Analysis Date	Analyst	Method	Sample Tag
07081334-1	W-2	WG148004	WG148055	08-Aug-07 07:03	JMW	SW-846 6020	D10:1
07081334-1	W-2		WG148512	15-Aug-07 06:14	JMW	SW-846 6020	D10:1
07081334-2	NSDA-1	WG148004	WG148055	08-Aug-07 07:08	JMW	SW-846 6020	D10:1
07081334-2	NSDA-1		WG148512	15-Aug-07 06:16	JMW	SW-846 6020	D10:1
07081334-3	NSDA-2	WG148004	WG148055	08-Aug-07 07:14	JMW	SW-846 6020	D10:1
07081334-3	NSDA-2		WG148512	15-Aug-07 06:19	JMW	SW-846 6020	D10:1
07081334-4	T-6A	WG148004	WG148055	08-Aug-07 07:19	JMW	SW-846 6020	D10:1
07081334-4	T-6A		WG148512	15-Aug-07 06:22	JMW	SW-846 6020	D10:1
07081334-5	FP-1	WG148004	WG148055	08-Aug-07 07:24	JMW	SW-846 6020	D10:1
07081334-5	FP-1		WG148512	15-Aug-07 06:25	JMW	SW-846 6020	D10:1
07081334-6	TL-3	WG148004	WG148055	08-Aug-07 07:29	JMW	SW-846 6020	D10:1
07081334-6	TL-3		WG148512	15-Aug-07 06:28	JMW	SW-846 6020	D10:1
07081334-7	FP-2	WG148004	WG148055	08-Aug-07 07:35	JMW	SW-846 6020	D10:1
07081334-7	FP-2		WG148512	15-Aug-07 06:44	JMW	SW-846 6020	D10:1
07081334-8	FP-2 DUP	WG148004	WG148055	08-Aug-07 07:40	JMW	SW-846 6020	D10:1
07081334-8	FP-2 DUP		WG148512	15-Aug-07 06:47	JMW	SW-846 6020	D10:1

METHOD BLANK

Laboratory ID: WG148004-1 Analysis Lot: WG148055 Prep Batch: WG148004 Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	1.0U	1.0	08-Aug-07 06:46

Laboratory ID: WG148512-3 Analysis Lot: WG148512 Prep Batch: N/A Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	1.0U	1.0	15-Aug-07 06:08

LABORATORY CONTROL SAMPLE

Laboratory ID: WG148004-2 Analysis Lot: WG148055 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	556	600	108	80.0-120	08-Aug-07 06:50

Laboratory ID: WG148512-4 Analysis Lot: WG148512 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	500	540	108	80.0-120	15-Aug-07 06:10

PDC Laboratories Quality Control Summary Report

PROJECT: 07081334

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Laboratory IDs: WG148512-5, WG148512-6 Analysis Lot: WG148512 Sample Spiked: 07081334-6 Site: TL-3 Sample Tag: D10:1

Analyte	Units	Amt MS Spiked	Amt MSD Spiked	Sample Value	MS Value	MSD Value	MS % Rec	MSD % Rec	Rec Limits	RPD	RPD Limits
Lead, Dissolved	UG/L	500	500	1.0U	550	550	110	110	75.0-125	0.00	20.0

INITIAL CALIBRATION VERIFICATION

Laboratory ID: WG148055-1 Analysis Lot: WG148055 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25.0	24.	96.0	90.0-110	08-Aug-07 06:24

Laboratory ID: WG148512-1 Analysis Lot: WG148512 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25.0	25.	100	90.0-110	15-Aug-07 06:02

INITIAL CALIBRATION BLANK

Laboratory ID: WG148055-2 Analysis Lot: WG148055

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	08-Aug-07 06:41

Laboratory ID: WG148512-2 Analysis Lot: WG148512

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.020J	0.10	15-Aug-07 06:05

CONTINUING CALIBRATION BLANK

Laboratory ID: WG148055-4 Analysis Lot: WG148055

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.018J	0.10	08-Aug-07 07:56

Laboratory ID: WG148512-10 Analysis Lot: WG148512

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.028J	0.10	15-Aug-07 07:17

PDC Laboratories Quality Control Summary Report

PROJECT: 07081334

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
CONTINUING CALIBRATION BLANK

Laboratory ID: WG148512-8 Analysis Lot: WG148512

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.030J	0.10	15-Aug-07 06:41

CONTINUING CALIBRATION VERIFICATION

Laboratory ID: WG148055-3 Analysis Lot: WG148055 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25	26	104	90.0-110	08-Aug-07 07:46

Laboratory ID: WG148512-7 Analysis Lot: WG148512 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25	26	104	90.0-110	15-Aug-07 06:37

Laboratory ID: WG148512-9 Analysis Lot: WG148512 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25	27	108	90.0-110	15-Aug-07 07:13

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November 15, 2007

Mr. Andy Duwelius
Earth Tech
5010 Stone Mill Road
Bloomington, IN 47408

Dear Mr. Duwelius:

Enclosed is the quality control deliverables for the October 31, 2007 groundwater sampling of Keystone Steel & Wire F-Pond. If you have any questions, please call.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

XC: Mr. Chad Erdman, Keystone Steel & Wire Co.

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EARTH TECH
BLOOMINGTON, IN

KEYSTONE STEEL & WIRE CO.
F-POND

SAMPLING EVENT:
OCTOBER 31, 2007

REPORT DATE:
NOVEMBER 15, 2007

TABLE OF CONTENTS

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CASE NARRATIVE

PDC Laboratories, Inc.
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To: Earth Tech

Facility: Keystone Steel & Wire Company, Project Number 95150.05

INORGANICS CASE NARRATIVE

Four groundwater samples and one duplicate sample were received on October 31, 2007 for analysis in accordance with our Level II protocol. The samples arrived in good condition with a cooler temperature of7. The samples were analyzed for Lead, Total and Dissolved (SW-846 Method 6020).

The analyses were performed according to protocol and within the maximum allowable holding times. The samples were analyzed on November 5, 2007 and November 9, 2007.

No matrix spike or matrix spike duplicate analyses were performed on this sample delivery group.

The recoveries for accuracy and precision were within their required QC limits. Recoveries on the other quality control parameters (blanks, controls, verifications, etc.) were within the required QC limits.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

COVER PAGE

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Form 0

INORGANIC ANALYSIS COVER PAGE

Client Sample ID	Lab Sample ID	Date Collected	Final Date Analyzed
FP-1	07104407-1	31-Oct-07	09-Nov-07
FP-2	07104407-2	31-Oct-07	09-Nov-07
FP-3	07104407-3	31-Oct-07	09-Nov-07
TL-3	07104407-4	31-Oct-07	09-Nov-07
Dup-1031	07104407-5	31-Oct-07	09-Nov-07

CHAIN OF CUSTODY

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

State where samples collected IL

F-POND LEAD MONITORING

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT) - (SAMPLE ACCEPTANCE POLICY ON REVERSE)

1 CLIENT INFORMATION

PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED
95150.05		COURIER
PHONE NUMBER	**FAX NUMBER**	**DATE SHIPPED**
812-336-6972	812-336-3991	10-31-07

MATRIX TYPES: WW-WASTEWATER, DW-DRINKING WATER, GW-GROUND WATER, WWSL-SLUDGE, NAS-SOLID, L'CHT-LEACHATE, OTHER:

3 ANALYSIS REQUESTED

4 (FOR LAB USE ONLY)
LOGIN # G7104407-5
LOGGED BY: MP
LAB PROJ. #
TEMPLATE:
PROJ. MGR.:

2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	BOTTLE COUNT	TOTAL LEAD	DISSOLVED LEAD						REMARKS
FP-1	10/31/07	0721	X		GW	2	X	X						
FP-2	10/31/07	0745	X		GW	2	X	X						
FP-3	10/31/07	0810	X		GW	2	X	X						
TC-3	10/31/07	0820	X		GW	2	X	X						
Dup-1031	10/31/07	0800	X		GW	2	X	X						

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) NORMAL RUSH DATE RESULTS NEEDED
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.*

7 RELINQUISHED BY: (SIGNATURE)	DATE / TIME	RECEIVED BY: (SIGNATURE)	DATE / TIME
RELINQUISHED BY: (SIGNATURE)	DATE / TIME	RECEIVED BY: (SIGNATURE)	DATE / TIME
RELINQUISHED BY: (SIGNATURE)	DATE / TIME	RECEIVED AT LAB BY: (SIGNATURE)	DATE 10/31/07 TIME 10:20

8 COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT 7 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) Y OR N
(EXCLUDES TYPICAL FIELD PARAMETERS)
DATE AND TIME TAKEN FROM SAMPLE BOTTLE

Copies: white should accompany samples to PDC Labs. Yellow [illegible] to be retained by the client.

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TABULATED ANALYTICAL RESULTS

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404
Attn : Mr. Andy Duwelius

Date Received : 10/31/07 10:00
Report Date 11/14/07
Customer # : 205746
P.O. Number : WN31654
Facility :

Sample No: **07104407-1** Collect Date **10/31/07 07:21**
Client ID : **PROJECT #95150.05** Site : **FP-1** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			11/05/07 10:00	JMW
SW-846 6020				
Lead		2.3 ug/l	11/08/07 07:00	JMW
Lead, Dissolved	U	1 ug/l	11/09/07 08:04	JMW

Sample No: **07104407-2** Collect Date **10/31/07 07:45**
Client ID : **PROJECT #95150.05** Site : **FP-2** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			11/05/07 10:00	JMW
SW-846 6020				
Lead	U	1 ug/l	11/08/07 07:05	JMW
Lead, Dissolved	U	1 ug/l	11/09/07 08:09	JMW

Sample No: **07104407-3** Collect Date **10/31/07 08:10**
Client ID : **PROJECT #95150.05** Site : **FP-3** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			11/05/07 10:00	JMW
SW-846 6020				
Lead	U	1 ug/l	11/08/07 07:10	JMW
Lead, Dissolved	U	1 ug/l	11/09/07 08:13	JMW

Sample No: **07104407-4** Collect Date **10/31/07 08:20**
Client ID : **PROJECT #95150.05** Site : **TL-3** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			11/05/07 10:00	JMW
SW-846 6020				
Lead	U	1 ug/l	11/08/07 07:15	JMW
Lead, Dissolved	U	1 ug/l	11/09/07 08:18	JMW

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404
Attn : Mr. Andy Duwelius

Date Received : 10/31/07 10:00
Report Date 11/14/07
Customer # : 205746
P.O. Number : WN31654
Facility :

Sample No: **07104407-5** Collect Date **10/31/07 08:00**
Client ID : **PROJECT #95150.05** Site : **DUP-1031** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			11/05/07 10:00	JMW
SW-846 6020				
Lead		1.3 ug/l	11/08/07 07:21	JMW
Lead, Dissolved	U	1 ug/l	11/09/07 08:23	JMW

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Wastewater Certifications: Arkansas; Iowa (240); Kansas (E-10338); Wisconsin (99829443)
Hazardous/Solid Waste Certifications: Arkansas; Kansas (E-10338); Wisconsin (998294430)
UST Certification: Iowa (240)

Certified by: Gail J. Schindler
Gail Schindler, Project Manager

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DISSOLVED METALS
QUALITY CONTROL DOCUMENTATION

PDC Laboratories Quality Control Summary Report

PROJECT: 07104407

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
QC CROSS REFERENCE REPORT

Lab ID	Client ID	Prep. Lot	Analysis Lot	Analysis Date	Analyst	Method	Sample Tag
07104407-1	FP-1	WG153619	WG153836	08-Nov-07 07:00	JMW	SW-846 6020	D10:1
07104407-1	FP-1		WG153941	09-Nov-07 08:04	JMW	SW-846 6020	D10:1
07104407-2	FP-2	WG153619	WG153836	08-Nov-07 07:05	JMW	SW-846 6020	D10:1
07104407-2	FP-2		WG153941	09-Nov-07 08:09	JMW	SW-846 6020	D10:1
07104407-3	FP-3	WG153619	WG153836	08-Nov-07 07:10	JMW	SW-846 6020	D10:1
07104407-3	FP-3		WG153941	09-Nov-07 08:13	JMW	SW-846 6020	D10:1
07104407-4	TL-3	WG153619	WG153836	08-Nov-07 07:15	JMW	SW-846 6020	D10:1
07104407-4	TL-3		WG153941	09-Nov-07 08:18	JMW	SW-846 6020	D10:1
07104407-5	DUP-1031	WG153619	WG153836	08-Nov-07 07:21	JMW	SW-846 6020	D10:1
07104407-5	DUP-1031		WG153941	09-Nov-07 08:23	JMW	SW-846 6020	D10:1

METHOD BLANK

Laboratory ID: WG153619-1 Analysis Lot: WG153836 Prep Batch: WG153619 Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	1.0U	1.0	08-Nov-07 06:35

Laboratory ID: WG153941-3 Analysis Lot: WG153941 Prep Batch: N/A Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	1.0U	1.0	09-Nov-07 07:46

LABORATORY CONTROL SAMPLE

Laboratory ID: WG153619-2 Analysis Lot: WG153836 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	556	560	101	80.0-120	08-Nov-07 06:39

Laboratory ID: WG153941-4 Analysis Lot: WG153941 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	500	550	110	80.0-120	09-Nov-07 07:50

INITIAL CALIBRATION VERIFICATION

Laboratory ID: WG153836-1 Analysis Lot: WG153836 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25.	24.	96.0	90.0-110	08-Nov-07 06:12

PDC Laboratories Quality Control Summary Report

PROJECT: 07104407

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
INITIAL CALIBRATION VERIFICATION

Laboratory ID: WG153941-1 Analysis Lot: WG153941 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25.	25.	100	90.0-110	09-Nov-07 07:32

INITIAL CALIBRATION BLANK

Laboratory ID: WG153836-2 Analysis Lot: WG153836

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	08-Nov-07 06:29

Laboratory ID: WG153941-2 Analysis Lot: WG153941

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.10U	0.10	09-Nov-07 07:42

CONTINUING CALIBRATION BLANK

Laboratory ID: WG153836-4 Analysis Lot: WG153836

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	08-Nov-07 07:50

Laboratory ID: WG153941-6 Analysis Lot: WG153941

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.10U	0.10	09-Nov-07 09:03

CONTINUING CALIBRATION VERIFICATION

Laboratory ID: WG153836-3 Analysis Lot: WG153836 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25	24	96.0	90.0-110	08-Nov-07 07:37

Laboratory ID: WG153941-5 Analysis Lot: WG153941 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25	27	108	90.0-110	09-Nov-07 08:53

ATTACHMENT 3

PLUGGING REPORT

4/2000

ILLINOIS DEPARTMENT OF PUBLIC HEALTH
DIVISION OF ENVIRONMENTAL HEALTH
525 W. JEFFERSON ST.
SPRINGFIELD, IL 62761

WATER WELL SEALING FORM

TYPE OR PRESS FIRMLY

RETURN ALL COPIES TO IDPH OR LOCAL HEALTH DEPARTMENT

[illegible]

1. Ownership (Name of Controlling Party) KEYSTONE STEEL & WIRE COMPANY

2. Well Location TL-4R 7000 S.W. ADAMS ST. PEORIA PEORIA
Address - Lot Number City County

General Description Township 8 (N)(S) Range 7 (E)(W) Section 36

SE Quarter of the SE Quarter of the NE Quarter

3. Year Drilled 2006

4. Drilling Permit Number (and date, if known) NA

5. Type of Well Bored ____ Drilled X Other MONITORING WELL

6. Total Depth 15' Diameter (inches) ____

7. Formation clear of obstruction X Yes ____ No

8. DETAILS OF PLUGGING

Filled with ____ from ____ to ____ ft.
(cement or other materials)

Kind of plug NEAT CEMENT GROUT from 0 to 8 ft.

Filled with SAND PACK COLLAPSE from 8 to 15 ft.

Kind of plug ____ from ____ to ____ ft.

Filled with ____ from ____ to ____ ft.

Kind of plug ____ from ____ to ____ ft.

9. CASING RECORD Upper 2 feet of casing removed X Yes ____ No

10. Date well was sealed Month JULY Day 18 Year 2007.

11. Licensed water well driller or other person approved by the Department performing well sealing.

JOHN UPCRAFT
Name

____
Complete License Number

P.O. BOX 1243
Address

MT. VERNON
City

IL 62864
State/ZIP

This state agency is requesting disclosure of information that is necessary to accomplish the statutory purpose as outlined under Public Act 85-0863. Disclosure of this information is mandatory. This form has been approved by the Forms Management Center. IL 482-0631

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P.O. #530379 9.6M 4/00

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

July 27, 2007

DE-9J REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vic Stirnaman
Executive Vice President
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Groundwater Monitoring Letter Report
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Stirnaman

The U.S. EPA has completed the review of your July 13, 2007, Groundwater Monitoring Letter Report at the Keystone Steel and Wire Company. The U.S. EPA disagrees with the conclusion in the letter report. The letter report presents results of the April 24-25, 2007 groundwater monitoring event and concludes that Keystone believes that no further monitoring of groundwater in the North Ditch Staging Area and F-Pond is warranted.

As you indicated in the letter report, a replacement monitoring well for well TL4-R was proposed. While this replacement well is not in place and functional, total lead and pH levels in well TL4-R remain elevated at the southeastern corner of the F-Pond. Finally, as you indicate, when the replacement well is installed, the well will be sampled on a quarterly basis for one year to demonstrate satisfactory closure of the F-Pond. The U.S. EPA believes that all existing monitoring wells must be included in this demonstration for the U.S. EPA to accept satisfactory closure at the F-Pond and the North Ditch Staging Area.

If you have any questions, please contact me at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Waste Pesticides and Toxics Division

Cc: Chad Erdmann, KS&W

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ENTACT.
environmental services

July 13, 2007

Mr. Jonathan Adenuga
U.S. EPA Region 5, DE-9J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

RE: Groundwater Monitoring Letter Report
April 2007 Quarterly Event
Keystone Steel & Wire Company
7000 SW Adams Street, Peoria, Illinois

Dear Jonathan:

On behalf of the Keystone Steel & Wire Company ("Keystone"), ENTACT Services LLC ("ENTACT") is submitting this Groundwater Monitoring Letter Report for the April 2007 quarterly monitoring event. This letter report discusses the groundwater monitoring results from the April 24-25, 2007 sampling of the groundwater monitoring wells. This sampling event was required as part of the corrective measures implemented at the F-Pond and North Ditch Staging Area. The following sections describe the sampling procedures, field parameter results and laboratory analytical results for the April 24-25, 2007 sampling event.

Groundwater Monitoring Event

Groundwater samples were collected by Keystone's groundwater monitoring consultant, EarthTech, from groundwater monitoring wells FP-1, FP-2 and TL-3 at the F-Pond and groundwater monitoring wells NDSA-1, NDSA-2, W-2, and T-6A at the North Ditch Staging Area on April 25, 2007. Groundwater samples were previously collected from these groundwater monitoring wells on July 13, 2006, October 6, 2006 and November 29, 2006, and January 17, 2007.

Refer to Figure 1 for the location of these monitoring wells.

Sampling Procedures

Prior to sampling, water level measurements were taken at each monitoring well with an electronic water level measuring device to determine the depth to groundwater. The calculated static water table elevations were then used to construct a groundwater gradient map for the F-Pond and North Ditch Staging Area. From this data, it was determined that the groundwater flow direction at the F-Pond was to the south and to the south/southwest at the North Ditch Staging Area. These flow directions are consistent with the previous quarterly monitoring event.

3129 Bass Pro Drive ○ Grapevine, Texas 76051 ○ p.972.580.1323 ○ f.972.550.7464
www.entact.com

A summary of the water level measurements is presented on Table 1 and the groundwater flow direction and elevations are presented on Figure 2.

After measurement, the monitoring wells were purged and sampled using clean disposable bailers. The depth to groundwater information collected was also used to determine the amount of groundwater required to be removed from each well prior to sampling. At least three well volumes were removed by hand bailing prior to collecting a sample.

Groundwater samples were then collected from each monitoring well and were submitted for laboratory analysis of total and dissolved lead by U.S. EPA Method SW-846 6020. The samples from each monitoring well were collected in two 500 ml plastic containers and preserved with nitric acid. A 0.45 micron filter was used to filter a separate aliquot sample for dissolved lead. A separate aliquot sample was also collected from each monitoring well for field measurements of temperature, pH, conductivity, and turbidity (see Table 2 for the field parameter results). The samples were placed in a cooler with ice under chain-of-custody. The samples were picked up by a laboratory courier for delivery to PDC Laboratories in Peoria, Illinois. The purge water was containerized and transferred to the groundwater monitoring zone treatment system, which ultimately connects to the facility's wastewater treatment system, for disposal.

Analytical Results

The laboratory analytical results indicate that total and dissolved lead concentrations were below the laboratory detection limit of 1 part per billion (ppb) in monitoring wells FP-2, NDSA-2, T6-A, and W-2. Total lead was detected in monitoring well FP-1, located upgradient of the F-Pond, at a concentration of 3 ppb; in monitoring well TL-3, located side-gradient to the F-Pond, at a concentration of 1.5 ppb; and in monitoring well NDSA-1, located downgradient of the North Ditch Staging Area, at a concentration of 1 ppb. These detections were below the concentrations previously detected in these monitoring wells or below the laboratory detection limit of 5 ppb used for the previous monitoring events. The dissolved lead concentrations associated with these monitoring wells were below the laboratory detection limit of 1 ppb.

Groundwater samples were not collected from monitoring well TL4-R during this quarterly event due to U.S. EPA's approval to plug and abandon the well.

The laboratory analytical results are presented on Table 2 and the laboratory analytical reports are included as Attachment 1.

Monitoring Well TL4-R Discussion

Pursuant to the Groundwater Monitoring Letter dated February 5, 2007 and U.S. EPA's letter

dated April 17, 2007, Keystone plans to close monitoring well TL4-R and install a new monitoring well further down-gradient at a location clearly outside the boundary of the F-Pond and Tail Tracks Landfill cap. This is scheduled to be completed during the week of July 16, 2007. After installation, the new monitoring well will developed and sampled. The results of the sampling will be submitted to U.S. EPA for review.

Conclusions

Per the requirements of Sections 3.2.9 and 3.3.8 of the *Corrective Measures Implementation Workplan, Revision 2.0* dated April 17, 2006, groundwater monitoring was to be conducted on a quarterly basis for a period of one year. The April 24-25, 2007 quarterly sampling event represents the last quarterly monitoring event required by the workplan. However, because of the previous detections in monitoring well TL4-R, an additional groundwater monitoring well will be installed downgradient of monitoring well TL4-R outside of the limits of the F-Pond and the Tail Tracks Landfill. This new monitoring well will be sampled on a quarterly basis for a period of one year to demonstrate satisfactory closure of the F-Pond.

Based on the groundwater monitoring results for samples collected during the year from the North Ditch Staging Area and F-Pond, it appears that total and dissolved lead concentrations in the groundwater have decreased and/or stabilized. Therefore, the elevated concentrations of lead detected in monitoring well FP-1 (at the F-Pond) in July 2006 were temporary and associated with the soil disturbing activities of the F-Pond corrective measure. Thus, Keystone believes that no further monitoring of the groundwater in the North Ditch Staging Area and F-Pond is warranted, with the exception of the new monitoring well at the F-Pond.

If you have any questions or concerns regarding this addendum, please feel free to contact me at (972) 580-1323 or Chad Erdmann with Keystone at (309) 697-7165.

Respectfully,

Jenny Self

Jenny Self
ENTACT Services LLC

Attachments

cc: Chad Erdmann, Keystone Steel & Wire Company
Jim Moore, IEPA
Thad Slaughter, ENTACT Services, LLC

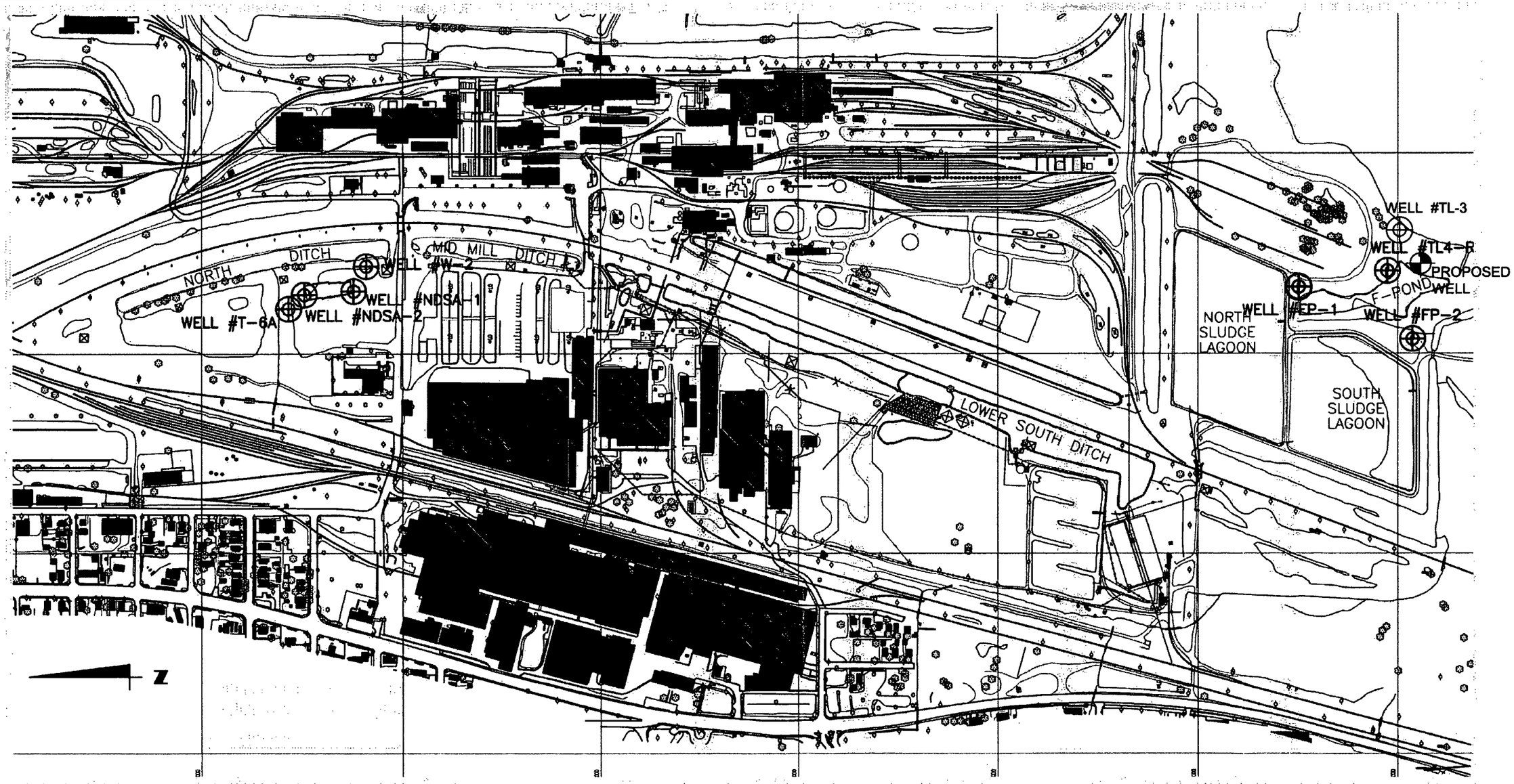
TABLE 1
Water Level Measurements for Groundwater Monitoring Wells
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

Monitoring Well ID No.	Installation/ Sample Date	Ground Elevation (ft amsl)	TOC Elevation (ft amsl)	Standpipe Stickup (+) Stickdown (-)	Depth to Water (ft from gs)	Depth to Water (ft from TOC)	Water Elevation (ft amsl)
FP-1	05/02/06	450.75	453.25	+2.50			
	07/13/06				9.94	12.44	440.81
	10/05/06				10.41	12.91	440.34
	01/16/07				7.48	9.98	443.27
	04/24/07				5.38	7.88	445.37
FP-2	05/03/06	443.54	446.04	+2.50			
	07/13/06				4.72	7.22	438.82
	10/05/06				4.37	6.87	439.17
	01/16/07				0.71	3.21	442.83
	04/24/07				10.80	6.09	439.95
TL-3	09/18/01	444.01	446.60	+2.59			
	11/28/06				2.55	5.14	441.46
	01/16/07				-1.03	1.56	445.04
	04/24/07				1.40	3.99	442.61
TL4-R	05/03/06	448.95	451.45	+2.50			
	07/13/06				9.53	12.03	439.42
	10/05/06				9.55	12.05	439.40
	01/16/07				6.07	8.57	442.88
	04/25/07				6.83	9.33	442.12
NDSA-1	05/02/06	449.67	449.67	0			
	07/13/06				9.08	9.08	440.59
	10/05/06				9.55	9.55	440.12
	01/16/07				7.05	7.05	442.62
	04/24/07				6.95	6.63	443.04
NDSA-2	05/02/06	448.62	448.62	0			
	07/13/06				9.87	9.87	438.75
	10/05/06				8.34	8.34	440.28
	01/16/07				11.08	11.08	437.54
	04/24/07				9.09	8.79	439.83
T-6A	11/06/89	449.10	451.67	2.57			
	07/13/06				8.30	10.87	440.80
	10/05/06				8.72	11.29	440.38
	01/16/07				5.98	8.55	443.12
	04/24/07				5.94	8.51	443.16
W-2	01/15/86	448.60	451.79	3.19			
	07/13/06				9.61	12.80	438.99
	10/05/06				9.73	12.92	438.87
	01/16/07				5.79	8.98	442.81
	04/24/07				6.94	9.63	442.16

TABLE 2
Field Parameter and Laboratory Analytical Results for Groundwater Samples
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

MW ID No.	Sample Date	Total Lead (ug/l)	Dissolved Lead (ug/l)	pH (s.u.)	Conductivity (mS/cm)	Turbidity (NTU)	Temperature (°C)	Comments
F-Pond Monitoring Wells								
FP-1	07/13/06	13	<5	7.58	1.940	175	21.10	
	10/06/06	6.6	<5	7.43	1.560	9	15.10	
	01/17/07	6.6	<5	7.00	1.450	15	11.10	
	04/25/07	3	<1	6.88	1.640	10	11.19	
FP-2	07/13/06	<5	<5	6.05	2.270	118	20.30	
	10/06/06	<5	<5	6.65	2.060	6	15.10	
	10/06/06	<5	<5	6.71	2.020	9	15.90	Duplicate
	01/17/07	<5	<5	6.30	1.700	1	7.20	
	01/17/07	<5	<5	6.30	1.700	1	7.20	Duplicate
	04/25/07	<1	<1	6.59	2.070	9.8	10.36	
TL-3	11/29/06	<5	<5	7.23	1.960	114	17.09	
	01/17/07	<5	<5	9.21	1.710	14	3.50	
	04/25/07	1.5	<1	6.57	2.650	56	11.79	
TLR-4	07/13/06	11000	8800	11.41	5.430	120	21.40	
	10/06/06	17000	18000	12.49	4.400	17	17.00	
	01/17/07	470	200	12.22	1.740	0	9.60	
	04/25/07	No sample collected - MW to be plugged and abandoned.						
North Ditch Staging Area Monitoring Wells								
NDSA-1	07/13/06	<5	<5	5.46	0.950	15	20.30	
	10/06/06	<5	<5	6.52	0.944	11	17.10	
	01/17/07	<5	<5	5.87	0.819	11	11.80	
	04/25/07	<1	<1	6.56	0.866	24	11.75	
	04/25/07	1	<1	6.32	0.866	23	11.76	Duplicate
NDSA-2	07/13/06	<5	<5	5.98	0.990	3	20.30	
	10/06/06	<5	<5	6.75	0.934	6	16.70	
	01/17/07	<5	<5	6.26	0.905	0	10.90	
	04/25/07	<1	<1	6.69	1.199	12	10.13	
T-6A	07/13/06	<5	<5	5.67	1.290	15	19.00	
	07/13/06	<5	<5	5.57	1.320	26	19.70	Duplicate
	10/06/06	<5	<5	6.67	1.180	11	15.40	
	01/17/07	<5	<5	6.25	1.050	7	10.90	
	04/25/07	<1	<1	6.42	1.280	22	11.22	
W-2	07/13/06	<5	<5	5.81	1.450	106	20.30	
	10/06/06	6.5	<5	7.22	1.340	8	15.10	
	01/17/07	<5	<5	6.32	1.140	0	11.40	
	04/25/07	<1	<1	6.55	1.315	24	10.54	

Notes:
<: Less than the detection limit



LEGEND

- MONITORING WELL
- PROPOSED MONITORING WELL

MONITORING WELL LOCATION MAP

DRAWING SCALE 0 500 1000 scale feet UNLESS OTHERWISE NOTED

WELL #	NORTHING	EASTING	ELEV
F POND			
FP-1	15492.687	9334.767	453.25
TL4-R	15050.765	9413.462	451.45
FP-2	14925.184	9073.208	446.04
NORTH DITCH STAGING AREA			
NDSA-2	20489.974	9296.460	448.62
NDSA-1	20243.901	9313.923	449.67
T-6A	20569.15	9223.84	451.67
W-2	20180.69	9438.46	451.79

BASE MAP FROM FOTH & DYKE AND ASSOCIATES, INC.

ENTACT environmental services
3129 Bass Pro Drive • Grapevine, TX 76051
(972) 560-1323 • Fax (972) 560-1464

NO.	DATE	REVISION	APP.

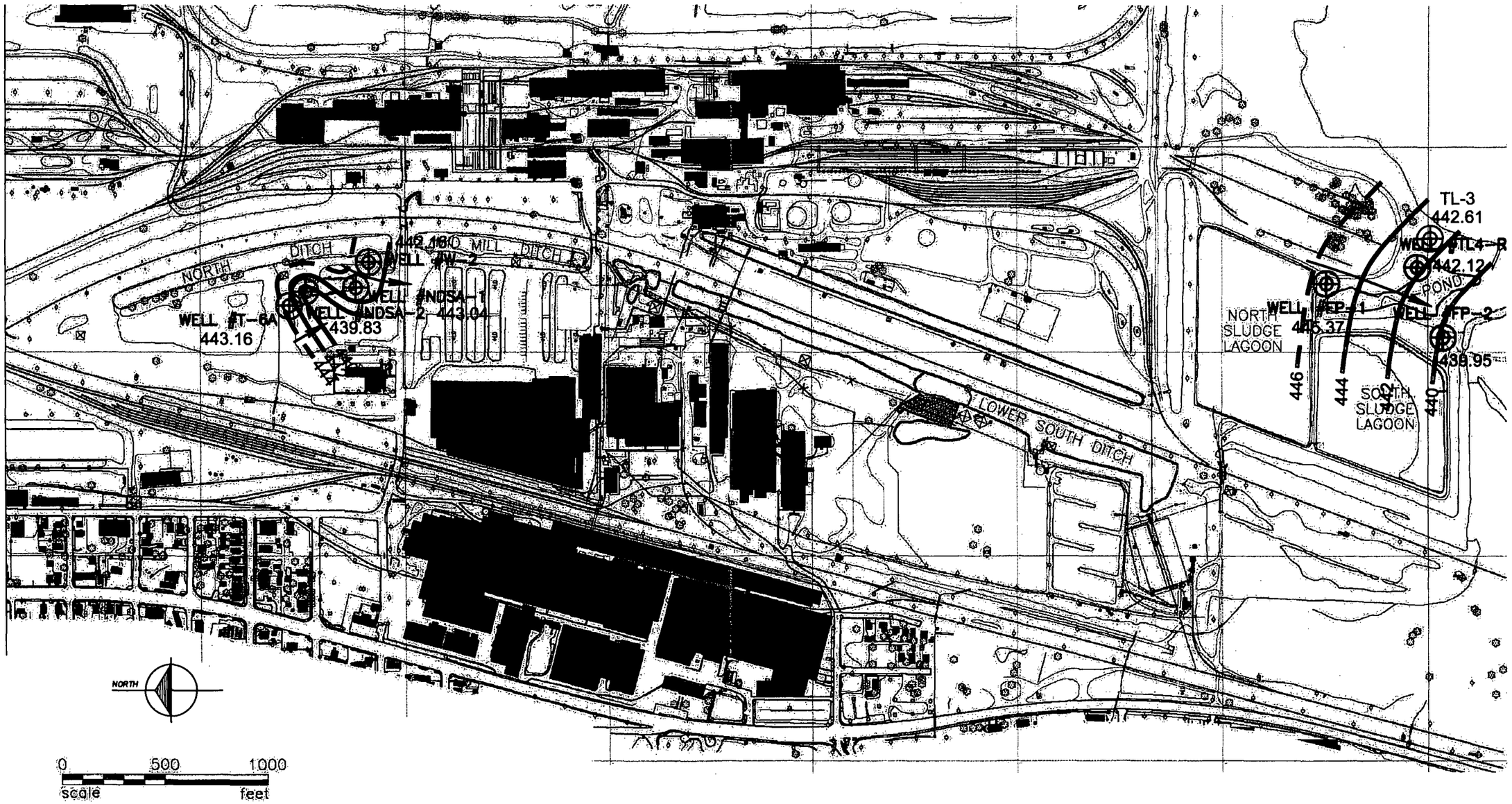
Scale: AS SHOWN | Drawn By: – | Checked By: – | Date: 2/22/07

KEYSTON STEEL & WIRE CO.
PEORIA, IL

FIGURE 1

MONITORING WELL LOCATION MAP

P:\Projects\Keystone, Peoria,IL\Drawings\keystone-023.dwg, 4/20/2007 4:48:57 PM, entact,entact



LEGEND

⊕	MONITORING WELL
443.16	GROUNDWATER ELEVATION – APRIL 24-25, 2007
440 ———	POTENTIOMETRIC SURFACE CONTOUR
——→	GROUNDWATER FLOW DIRECTION

BASE MAP FROM FOTH & VAN DYKE AND ASSOCIATES, INC.

WELL #	NORTHING	EASTING	ELEV
F POND			
FP–1	15492.687	9334.767	453.25
TL4–R	15050.765	9413.462	451.45
FP–2	14925.184	9073.208	446.04
NORTH DITCH STAGING AREA			
NDSA–2	20489.974	9296.460	448.62
NDSA–1	20243.901	9313.923	449.67
T–6A	20569.15	9223.84	451.67
W–2	20180.69	9438.46	451.79

POTENTIOMETRIC SURFACE MAP
F-POND AND
NORTH DITCH STAGING AREA
APRIL 24-25, 2007

KEYSTONE STEEL & WIRE CO.
PEORIA, ILLINOIS

Date 05-07

Project No. 95150

EarthTech
A tyco International Ltd. Company

Figure 2

L:\work\95150\Dwg\pot042407.dwg 05/29/07 10:34 AM nancy.wilzbacher

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

May 18, 2007

Mr. Andy Duwelius
Earth Tech
5010 Stone Mill Road
Bloomington, IN 47408

Dear Mr. Duwelius:

Enclosed is the quality control deliverables for the April 25, 2007 groundwater sampling event at Keystone Steel & Wire F-Pond. If you have any questions, please call.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

XC: Mr. Chad Erdman, Keystone Steel & Wire Co.

recycled paper

EARTH TECH
BLOOMINGTON, IN

KEYSTONE STEEL & WIRE CO
F-POND

SAMPLING EVENT:
APRIL 25, 2007

REPORT DATE:
MAY 18, 2007

TABLE OF CONTENTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

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CASE NARRATIVE

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

To: Earth Tech

Facility: Keystone Steel & Wire Company, Project Number 95150.02

INORGANICS CASE NARRATIVE

Seven groundwater samples and one duplicate sample were received on April 25, 2007 for analysis in accordance with our Level II protocol. Samples arrived in good condition with a cooler temperature of 4°C. The samples were analyzed for Lead, Total and Dissolved (SW-846 Method 6020). No sample was received for TL-4R.

The analysis was performed according to protocol and within the maximum allowable holding times. The samples were analyzed on May 3, 2007 and May 8, 2007.

Matrix spike and matrix spike duplicate analyses were performed on FP-1 for Lead Total and NDSA-1 for Lead Dissolved. The recoveries for accuracy and precision were within their required QC limits. Recoveries on the other quality control parameters (blanks, controls, verifications, etc.) were within the required QC limits.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

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COVER PAGE

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

Form 0

INORGANIC ANALYSIS COVER PAGE

Client Sample ID	Lab Sample ID	Date Collected	Final Date Analyzed
FP-1	07043719-1	25-Apr-07	08-May-07
FP-2	07043719-2	25-Apr-07	08-May-07
TL-3	07043719-3	25-Apr-07	08-May-07
W-2	07043719-4	25-Apr-07	08-May-07
T-6A	07043719-5	25-Apr-07	08-May-07
NDSA-1	07043719-6	25-Apr-07	08-May-07
NDSA-2	07043719-7	25-Apr-07	08-May-07
Dup-0425	07043719-8	25-Apr-07	08-May-07

recycled paper

CHAIN OF CUSTODY

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

State where samples collected IL

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT) - (SAMPLE ACCEPTANCE POLICY ON REVERSE)

1			
CLIENT: EARTH TECH (KEYSTONE LEAD G.W. Monitoring)	PROJECT NUMBER: 95150.02	P.O. NUMBER:	MEANS SHIPPED: DROP OFF
ADDRESS: 5010 STONE Mill Rd	PHONE NUMBER: 812-336-0972	FAX NUMBER: 812-336-3991	DATE SHIPPED: 4-25-07
CITY STATE ZIP: Bloomington, IN 47408	SAMPLER (PLEASE PRINT): Duwelius		MATRIX TYPES: WW-WASTEWATER, DW-DRINKING WATER, GW-GROUND WATER, WWSL-SLUDGE, NAS-SOLID, L'CHT-LEACHATE, OTHER:
CONTACT PERSON: Andy Duwelius	SAMPLER'S SIGNATURE: Duwelius		

3 ANALYSIS REQUESTED

4 (FOR LAB USE ONLY)
LOGIN # 07043719-8
LOGGED BY: AP
LAB PROJ. #
TEMPLATE:
PROJ. MGR.:

2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	BOTTLE COUNT	TOTAL LEAD	DISSOLVED LEAD						REMARKS
FP-1	4-25-07	0840	X		GW	2	X	X						
FP-2	4-25-07	0836	X		GW	2	X	X						
TL-3	4-25-07	0800	X		GW	2	X	X						
~~TL-4R~~	~~4-25-07~~		~~X~~		~~GW~~	~~2~~	~~X~~	~~X~~						NOT Sampled
W-2	4-25-07	0658	X		GW	2	X	X						
T-6A	4-25-07	0725	X		GW	2	X	X						
NDSA-1	4-25-07	0710	X		GW	2	X	X						
NDSA-2	4-25-07	0735	X		GW	2	X	X						
Dup-0425	4-25-07	0830	X		GW	2	X	X						

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) NORMAL RUSH DATE RESULTS NEEDED
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.*

7			
RELINQUISHED BY: (SIGNATURE) John A. Duwelius	DATE 4-25-07 TIME 10:20 AM	RECEIVED BY: (SIGNATURE)	DATE TIME
RELINQUISHED BY: (SIGNATURE)	DATE TIME	RECEIVED BY: (SIGNATURE)	DATE TIME
RELINQUISHED BY: (SIGNATURE)	DATE TIME	RECEIVED AT LAB BY: (SIGNATURE) [signature]	DATE 4/25/07 TIME 10:20 AM

8 COMMENTS: (FOR LAB USE ONLY)
SAMPLE TEMPERATURE UPON RECEIPT 4 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) Y OR N
(EXCLUDES TYPICAL FIELD PARAMETERS)
DATE AND TIME TAKEN FROM SAMPLE BOTTLE

Copies: white should accompany samples to PDC Labs. Yellow c[illegible] to be retained by the client.

00000004

TABULATED ANALYTICAL RESULTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404
Attn : Mr. Andy Duwelius

Date Received : 04/25/07 10:20
Report Date 05/18/07
Customer # : 205746
P.O. Number :
Facility :

Sample No: **07043719-1** Collect Date **04/25/07 08:40**
Client ID : **PROJECT #95150.02** Site : **FP-1** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			04/30/07 12:00	DAB
SW-846 6020				
Lead		3 ug/l	05/03/07 11:22	JMW
Lead, Dissolved	U	1 ug/l	05/08/07 06:54	JMW

Sample No: **07043719-2** Collect Date **04/25/07 08:36**
Client ID : **PROJECT #95150.02** Site : **FP-2** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			04/30/07 12:00	DAB
SW-846 6020				
Lead	U	1 ug/l	05/03/07 11:37	JMW
Lead, Dissolved	U	1 ug/l	05/08/07 06:58	JMW

Sample No: **07043719-3** Collect Date **04/25/07 08:00**
Client ID : **PROJECT #95150.02** Site : **TL-3** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			04/30/07 12:00	DAB
SW-846 6020				
Lead		1.5 ug/l	05/03/07 11:39	JMW
Lead, Dissolved	U	1 ug/l	05/08/07 07:01	JMW

Sample No: **07043719-4** Collect Date **04/25/07 06:58**
Client ID : **PROJECT #95150.02** Site : **W-2** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			04/30/07 12:00	DAB
SW-846 6020				
Lead	U	1 ug/l	05/03/07 11:41	JMW
Lead, Dissolved	U	1 ug/l	05/08/07 07:05	JMW

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404
Attn : Mr. Andy Duwelius

Date Received : 04/25/07 10:20
Report Date 05/18/07
Customer # : 205746
P.O. Number :
Facility :

Sample No: **07043719-5** Collect Date **04/25/07 07:25**
Client ID : **PROJECT #95150.02** Site : **T-6A** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			04/30/07 12:00	DAB
SW-846 6020				
Lead	U	1 ug/l	05/03/07 11:43	JMW
Lead, Dissolved	U	1 ug/l	05/08/07 07:08	JMW

Sample No: **07043719-6** Collect Date **04/25/07 07:10**
Client ID : **PROJECT #95150.02** Site : **NDSA-1** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			04/30/07 12:00	DAB
SW-846 6020				
Lead	U	1 ug/l	05/03/07 11:45	JMW
Lead, Dissolved	U	1 ug/l	05/08/07 07:12	JMW

Sample No: **07043719-7** Collect Date **04/25/07 07:35**
Client ID : **PROJECT #95150.02** Site : **NDSA-2** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			04/30/07 12:00	DAB
SW-846 6020				
Lead	U	1 ug/l	05/03/07 11:47	JMW
Lead, Dissolved	U	1 ug/l	05/08/07 07:48	JMW

Sample No: **07043719-8** Collect Date **04/25/07 08:30**
Client ID : **PROJECT #95150.02** Site : **DUP-0425** Locator : **KEYSTONE F POND**

Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 3015				
Sample Preparation			04/30/07 12:00	DAB
SW-846 6020				
Lead		1 ug/l	05/03/07 11:50	JMW
Lead, Dissolved	U	1 ug/l	05/08/07 07:52	JMW

PDC Laboratories, Inc.
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(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404
Attn : Mr. Andy Duwelius

Date Received : 04/25/07 10:20
Report Date 05/18/07
Customer # : 205746
P.O. Number :
Facility :

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NELAC Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230
State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
Drinking Water Certifications: Indiana (C-IL-040); Kansas (E-10338); Kentucky (90058); Missouri (00870); Wisconsin (998294430)
Wastewater Certifications: Arkansas; Iowa (240); Kansas (E-10338); Wisconsin (99829443)
Hazardous/Solid Waste Certifications: Arkansas; Kansas (E-10338); Wisconsin (998294430)
UST Certification: Iowa (240)

Certified by: Gail Schindler
Gail Schindler, Project Manager

This report shall not be reproduced, except in full, without the written approval of the laboratory.

07043719

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METALS
QUALITY CONTROL DOCUMENTATION

PDC Laboratories Quality Control Summary Report

PROJECT: 07043719

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
QC CROSS REFERENCE REPORT

Lab ID	Client ID	Prep. Lot	Analysis Lot	Analysis Date	Analyst	Method	Sample Tag
07043719-1	FP-1	WG141560	WG141854	03-May-07 11:22	JMW	SW-846 6020	D10:1
07043719-1	FP-1		WG142092	08-May-07 06:54	JMW	SW-846 6020	D10:1
07043719-2	FP-2	WG141560	WG141854	03-May-07 11:37	JMW	SW-846 6020	D10:1
07043719-2	FP-2		WG142092	08-May-07 06:58	JMW	SW-846 6020	D10:1
07043719-3	TL-3	WG141560	WG141854	03-May-07 11:39	JMW	SW-846 6020	D10:1
07043719-3	TL-3		WG142092	08-May-07 07:01	JMW	SW-846 6020	D10:1
07043719-4	W-2	WG141560	WG141854	03-May-07 11:41	JMW	SW-846 6020	D10:1
07043719-4	W-2		WG142092	08-May-07 07:05	JMW	SW-846 6020	D10:1
07043719-5	T-6A	WG141560	WG141854	03-May-07 11:43	JMW	SW-846 6020	D10:1
07043719-5	T-6A		WG142092	08-May-07 07:08	JMW	SW-846 6020	D10:1
07043719-6	NDSA-1	WG141560	WG141854	03-May-07 11:45	JMW	SW-846 6020	D10:1
07043719-6	NDSA-1		WG142092	08-May-07 07:12	JMW	SW-846 6020	D10:1
07043719-7	NDSA-2	WG141560	WG141854	03-May-07 11:47	JMW	SW-846 6020	D10:1
07043719-7	NDSA-2		WG142092	08-May-07 07:48	JMW	SW-846 6020	D10:1
07043719-8	DUP-0425	WG141560	WG141854	03-May-07 11:50	JMW	SW-846 6020	D10:1
07043719-8	DUP-0425		WG142092	08-May-07 07:52	JMW	SW-846 6020	D10:1

METHOD BLANK

Laboratory ID: WG141560-1 Analysis Lot: WG141854 Prep Batch: WG141560 Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.36J	1.0	03-May-07 11:17

Laboratory ID: WG142092-3 Analysis Lot: WG142092 Prep Batch: N/A Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	1.0U	1.0	08-May-07 06:39

LABORATORY CONTROL SAMPLE

Laboratory ID: WG141560-2 Analysis Lot: WG141854 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	556	610	110	80.0-120	03-May-07 11:19

Laboratory ID: WG142092-4 Analysis Lot: WG142092 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	500	510	102	80.0-120	08-May-07 06:42

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PDC Laboratories Quality Control Summary Report

PROJECT: 07043719

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Laboratory IDs: WG141560-3, WG141560-4 Analysis Lot: WG141854 Sample Spiked: 07043719-1 Site: FP-1 Sample Tag: D10:1

Analyte	Units	Amt MS Spiked	Amt MSD Spiked	Sample Value	MS Value	MSD Value	MS % Rec	MSD % Rec	Rec Limits	RPD	RPD Limits
Lead	UG/L	556	556	3.0	570	580	102	104	75.0-125	1.74	20.0

Laboratory IDs: WG142092-5, WG142092-6 Analysis Lot: WG142092 Sample Spiked: 07043719-6 Site: NDSA-1 Sample Tag: D10:1

Analyte	Units	Amt MS Spiked	Amt MSD Spiked	Sample Value	MS Value	MSD Value	MS % Rec	MSD % Rec	Rec Limits	RPD	RPD Limits
Lead, Dissolved	UG/L	500	500	1.0U	520	470	104	94.0	75.0-125	10.1	20.0

INITIAL CALIBRATION VERIFICATION

Laboratory ID: WG141854-1 Analysis Lot: WG141854 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25.0	26.	104	90.0-110	03-May-07 10:54

Laboratory ID: WG142092-1 Analysis Lot: WG142092 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25.0	25.	100	90.0-110	08-May-07 06:22

INITIAL CALIBRATION BLANK

Laboratory ID: WG141854-2 Analysis Lot: WG141854

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	03-May-07 10:56

Laboratory ID: WG142092-2 Analysis Lot: WG142092

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.10U	0.10	08-May-07 06:35

CONTINUING CALIBRATION BLANK

Laboratory ID: WG141854-4 Analysis Lot: WG141854

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	03-May-07 11:33

PDC Laboratories Quality Control Summary Report

PROJECT: 07043719

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
CONTINUING CALIBRATION BLANK

Laboratory ID: WG141854-6 Analysis Lot: WG141854

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.10U	0.10	03-May-07 11:55

Laboratory ID: WG142092-10 Analysis Lot: WG142092

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.10U	0.10	08-May-07 08:49

Laboratory ID: WG142092-8 Analysis Lot: WG142092

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	0.10U	0.10	08-May-07 07:44

CONTINUING CALIBRATION VERIFICATION

Laboratory ID: WG141854-3 Analysis Lot: WG141854 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25	27	108	90.0-110	03-May-07 11:30

Laboratory ID: WG141854-5 Analysis Lot: WG141854 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25	27	108	90.0-110	03-May-07 11:52

Laboratory ID: WG142092-7 Analysis Lot: WG142092 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25	25	100	90.0-110	08-May-07 07:34

Laboratory ID: WG142092-9 Analysis Lot: WG142092 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	25	26	104	90.0-110	08-May-07 08:25

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

June 19, 2007

REPLY TO THE ATTENTION OF: DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vic Stirnaman
Executive Vice President
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Groundwater Monitoring Letter Report
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Stirnaman

The U.S. EPA has completed the review of your May 1, 2007, Groundwater Monitoring Letter Report at the Keystone Steel and Wire Company. The letter report presents results of the January 2007 groundwater monitoring event and provides recommendations for ongoing monitoring. Two issues of concern were identified with regard to the report:

1. Total lead and pH levels in well TL4-R remain elevated, and the letter report reaffirms the decision to replace this well with a new well further downgradient at the southeastern corner of the F-Pond. While the replacement well may not have been installed in time for the April 2007 monitoring round (based on EPA's approval date of April 17, 2007), it is expected that the well could be installed and operational for monitoring during the July 2007 sampling event. The letter report does not, however, indicate a projected date for the replacement. Keystone should provide a tentative installation date or schedule for that field effort.

2. The water elevation data in Table 1 indicate that groundwater at the site was generally higher during the January 2007 sampling event than in previous sampling rounds, but the groundwater elevation in well NDSA-2 dropped as compared to previous rounds. As plotted on Figure 2, these measurements suggest a convoluted groundwater flow pattern, with flow converging in an area southwest of well NDSA-2. Keystone should consider whether the water level measurement from well NDSA-2 was an error and/or what conditions could cause groundwater levels to decline in only this well while increasing in all of the remaining wells.

It should also be noted that lead was again detected at a concentration of 6.6 ppb in well FP-1. Although the lead level is below the Illinois EPA Tiered Approach to Corrective

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Action Objectives (TACO) standard of 7.5 ppb, future monitoring results should continue to be closely evaluated. Specifically, this evaluation should focus on whether the increased levels of lead reported in July 2006 (measured at 13 µg/L) were temporary and associated with disturbance of lead during corrective measures implementation at the F-Pond, or if they are indicative of more significant lead contamination in groundwater that requires further investigation and corrective action.

Finally, the letter report provides an explanation as to why groundwater samples are being analyzed for lead using EPA test method SW6020, rather than method SW6010B as specified in the work plan. According to the letter report, this change was implemented to allow for greater analytical sensitivity and lower lead reporting limits. This discussion in the current letter report adequately addresses the previous comment on this issue.

If you have any questions, please contact me at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Waste Pesticides and Toxics Division

Cc: Chad Erdmann, KS&W
Cc: Jim Moore, IEPA
Cc: Booze Allen

ENTACT®
environmental services

3129 Bass Pro Drive
Grapevine, Texas
76051

May 1, 2007

Mr. Jonathan Adenuga
U.S. EPA Region 5, DE-9J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

RE: Groundwater Monitoring Letter Report
January 2007 Quarterly Event
Keystone Steel & Wire Company
7000 SW Adams Street, Peoria, Illinois

Dear Jonathan:

On behalf of the Keystone Steel & Wire Company ("Keystone"), ENTACT Services LLC ("ENTACT") is submitting this Groundwater Monitoring Letter Report for the January 2007 quarterly monitoring event. This letter report discusses the groundwater monitoring results from the January 17, 2007 sampling of the groundwater monitoring wells. This sampling event was required as part of the corrective measures implemented at the F-Pond and North Ditch Staging Area. The following sections describe the sampling procedures, field parameter results and laboratory analytical results for the January 17, 2007 sampling event.

Groundwater Monitoring Event

Groundwater samples were collected by Keystone's groundwater monitoring consultant, EarthTech, from groundwater monitoring wells FP-1, FP-2, TL-3, and TL4-R at the F-Pond and groundwater monitoring wells NDSA-1, NDSA-2, W-2, and T-6A at the North Ditch Staging Area on January 17, 2007. Groundwater samples were previously collected from these groundwater monitoring wells on October 6, 2006 and November 29, 2006.

Refer to Figure 1 for the location of these monitoring wells.

Sampling Procedures

Prior to sampling, water level measurements were taken at each monitoring well with an electronic water level measuring device to determine the depth to groundwater. The calculated static water table elevations were then used to construct a groundwater gradient map for the F-Pond and North Ditch Staging Area. From this data, it was determined that the groundwater flow direction at the F-Pond was to the south and to the southwest at the North Ditch Staging Area. A summary of the water level measurements is presented on Table 1 and the groundwater flow direction and elevations are presented on Figure 2.

After measurement, the monitoring wells were purged and sampled using clean disposable bailers. The depth to groundwater information collected was also used to determine the amount of groundwater required to be removed from each well prior to sampling. At least three well volumes were removed by hand bailing prior to collecting a sample.

Groundwater samples were then collected from each monitoring well and were submitted for laboratory analysis of total and dissolved lead by U.S. EPA Method SW-846 6020. [U.S. EPA Method 6020 (Inductively Coupled Plasma – Mass Spectroscopy (ICP-MS) method) was used in lieu of U.S. EPA Method 6010B (Inductively Coupled Plasma – Atomic Emission Spectroscopy (ICP-AES) method) because the instrumentation allows for greater sensitivity and therefore allows lower reporting limits. The ICP-MS method is a more current technology being used by laboratories for metals analysis in soils and water.]

The samples from each monitoring well were collected in two 500 ml plastic containers and preserved with nitric acid. A 0.45 micron filter was used to filter a separate aliquot sample for dissolved lead. A separate aliquot sample was also collected from each monitoring well for field measurements of temperature, pH, conductivity, and turbidity (see Table 2 for the field parameter results). The samples were placed in a cooler with ice under chain-of-custody. The samples were picked up by a laboratory courier for delivery to PDC Laboratories in Peoria, Illinois. The purge water was containerized and transferred to the groundwater monitoring zone treatment system, which ultimately connects to the facility's wastewater treatment system, for disposal.

Analytical Results

The laboratory analytical results indicate that total and dissolved lead concentrations were below the laboratory detection limit of 5 parts per billion (ppb) in monitoring wells FP-2, TL-3, NDSA-1, NDSA-2, W-2, and T-6A. Total lead was detected in monitoring well FP-1, located upgradient of the F-Pond, at a concentration of 6.6 ppb.

Total and dissolved lead were also detected in monitoring well TL4-R at concentrations of 470 ppb and 200 ppb, respectively. This monitoring well replaced monitoring well TL-4 that was initially installed as part of the Environmental Indicators Assessment Investigation conducted in September 2001. Monitoring well TL4-R was installed in the vicinity of monitoring well TL-4 and cross-gradient to the local groundwater flow direction in the area. The elevated lead concentrations in the groundwater at monitoring well TL4-R were also accompanied by an unusually high pH level of 12.22.

The laboratory analytical results are presented on Table 2 and the laboratory analytical reports are included as Attachment 1.

Monitoring Well TL4-R Discussion

Pursuant to the Groundwater Monitoring Letter dated February 5, 2007 and U.S. EPA's letter dated April 17, 2007, Keystone plans to close monitoring well TL4-R and install a new monitoring well further down-gradient at a location clearly outside the boundary of the F-Pond and Tail Tracks Landfill cap. This new monitoring well will be sampled on a quarterly basis after the completion of the 4th quarterly sampling event to demonstrate satisfactory closure of the F-Pond.

Conclusions

Per the requirements of Sections 3.2.9 and 3.3.8 of the *Corrective Measures Implementation Workplan, Revision 2.0* dated April 17, 2006, groundwater monitoring will be conducted on a quarterly basis for a period of one year. The 4th quarter groundwater monitoring event was performed on April 25, 2007.

Keystone also plans to close monitoring well TL4-R and install a new groundwater monitoring well further downgradient. The replacement well will be installed to the south of the original well, TL-4, and outside of the footprint of the F-Pond and Tail Tracks Landfill, as detailed on Figure 2 of the February 5, 2007 Groundwater Monitoring Letter. The new groundwater monitoring well will be sampled on a quarterly basis for a period of one year. The samples will be submitted to an analytical laboratory for analysis of total and dissolved lead and the results will be forwarded to U.S. EPA for review.

If you have any questions or concerns regarding this addendum, please feel free to contact me at (972) 580-1323 or Chad Erdmann with Keystone at (309) 697-7165.

Respectfully,

Jenny Self

Jenny Self, P.G.
ENTACT Services LLC

Attachments

cc: Chad Erdmann, Keystone Steel & Wire Company
Jim Moore, IEPA
Thad Slaughter, ENTACT Services, LLC

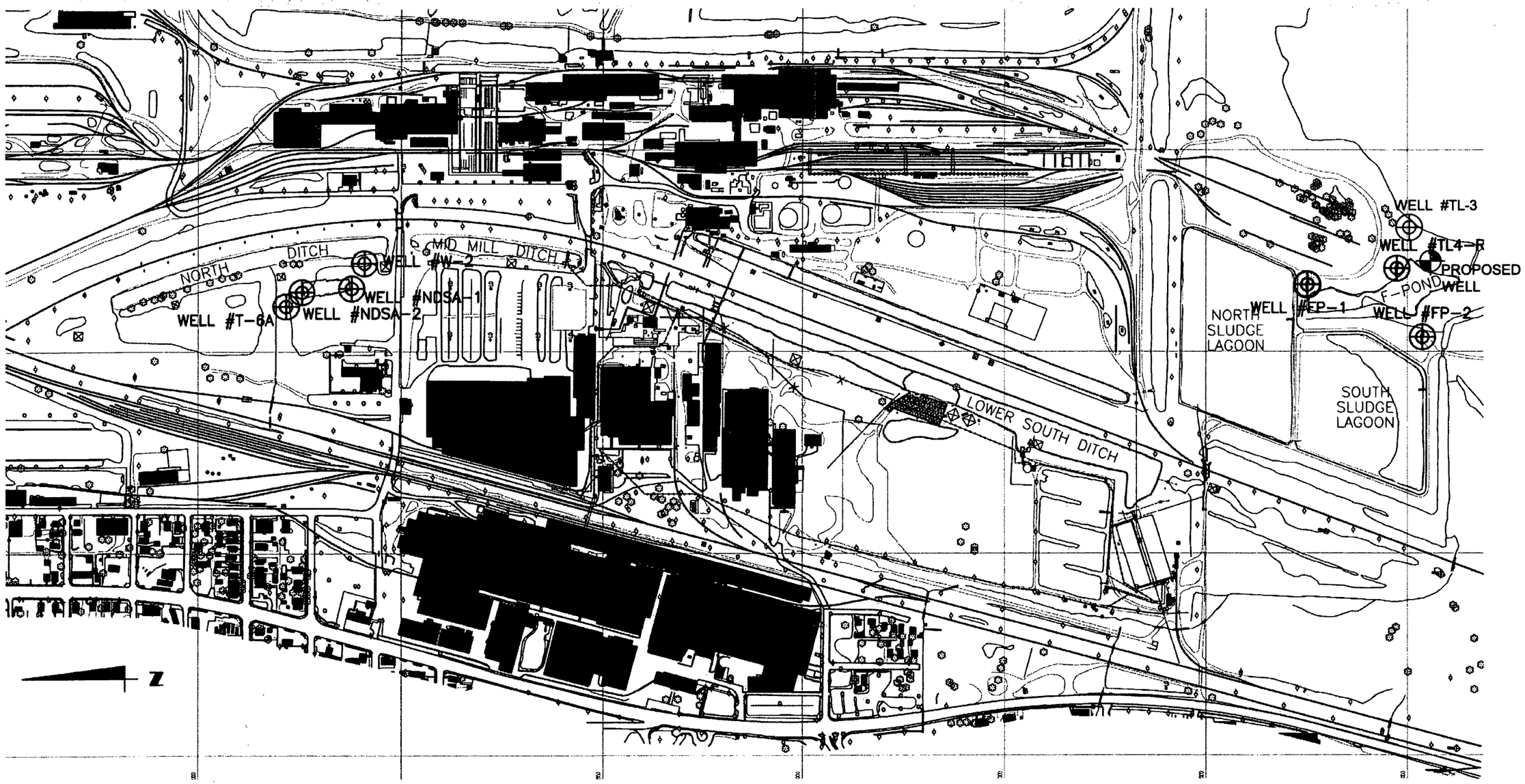
TABLE 1
Water Level Measurements for Groundwater Monitoring Wells
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

Monitoring Well ID No.	Installation/ Sample Date	Ground Elevation (ft amsl)	TOC Elevation (ft amsl)	Standpipe Stickup (+) Stickdown (-)	Depth to Water (ft from gs)	Depth to Water (ft from TOC)	Water Elevation (ft amsl)
FP-1	05/02/06	450.75	453.25	+2.50			
	07/13/06				9.94	12.44	440.81
	10/05/06				10.41	12.91	440.34
	01/16/07				7.48	9.98	443.27
FP-2	05/03/06	443.54	446.04	+2.50			
	07/13/06				4.72	7.22	438.82
	10/05/06				4.37	6.87	439.17
	01/16/07				0.71	3.21	442.83
TL4-R	05/03/06	448.95	451.45	+2.50			
	07/13/06				9.53	12.03	439.42
	10/05/06				9.55	12.05	439.40
	01/16/07				6.07	8.57	442.88
TL-3	09/18/01	444.01	446.60	+2.59			
	11/28/06				2.55	5.14	441.46
	01/16/07				-1.03	1.56	445.04
NDSA-1	05/02/06	449.67	449.67	0			
	07/13/06				9.08	9.08	440.59
	10/05/06				9.55	9.55	440.12
	01/16/07				7.05	7.05	442.62
NDSA-2	05/02/06	448.62	448.62	0			
	07/13/06				9.87	9.87	438.75
	10/05/06				8.34	8.34	440.28
	01/16/07				11.08	11.08	437.54
T-6A	11/06/89	449.10	451.67	2.57			
	07/13/06				8.30	10.87	440.80
	10/05/06				8.72	11.29	440.38
	01/16/07				5.98	8.55	443.12
W-2	01/15/86	448.60	451.79	3.19			
	07/13/06				9.61	12.80	438.99
	10/05/06				9.73	12.92	438.87
	01/16/07				5.79	8.98	442.81

TABLE 2
Field Parameter and Laboratory Analytical Results for Groundwater Samples
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

MW ID No.	Sample Date	Total Lead (ug/l)	Dissolved Lead (ug/l)	pH (s.u.)	Conductivity (mS/cm)	Turbidity (NTU)	Temperature (°C)	Comments
F-Pond Monitoring Wells								
FP-1	07/13/06	13	<5	7.58	1.94	175	21.1	
	10/06/06	6.6	<5	7.43	1.56	9	15.1	
	01/17/07	6.6	<5	7.00	1.45	15	11.1	
FP-2	07/13/06	<5	<5	6.05	2.27	118	20.3	
	10/06/06	<5	<5	6.65	2.06	6	15.1	
	10/06/06	<5	<5	6.71	2.02	9	15.9	Duplicate
	01/17/07	<5	<5	6.30	1.70	1	7.2	
	01/17/07	<5	<5	6.30	1.70	1	7.2	Duplicate
TLR-4	07/13/06	11000	8800	11.41	5.43	120	21.4	
	10/06/06	17000	18000	12.49	4.40	17	17.0	
	01/17/07	470	200	12.22	1.74	0	9.6	
TL-3	11/29/06	<5	<5	7.23	1.96	114	17.1	
	01/17/07	<5	<5	9.21	1.71	14	3.5	
North Ditch Staging Area Monitoring Wells								
NDSA-1	07/13/06	<5	<5	5.46	0.95	15	20.3	
	10/06/06	<5	<5	6.52	0.944	11	17.1	
	01/17/07	<5	<5	5.87	0.819	11	11.8	
NDSA-2	07/13/06	<5	<5	5.98	0.99	3	20.3	
	10/06/06	<5	<5	6.75	0.934	6	16.7	
	01/17/07	<5	<5	6.26	0.905	0	10.9	
T-6A	07/13/06	<5	<5	5.67	1.29	15	19.0	
	07/13/06	<5	<5	5.57	1.32	26	19.7	Duplicate
	10/06/06	<5	<5	6.67	1.18	11	15.4	
	01/17/07	<5	<5	6.25	1.05	7	10.9	
W-2	07/13/06	<5	<5	5.81	1.45	106	20.3	
	10/06/06	6.5	<5	7.22	1.34	8	15.1	
	01/17/07	<5	<5	6.32	1.14	0	11.4	

Notes:
<: Less than the detection limit



LEGEND

- MONITORING WELL
- PROPOSED MONITORING WELL

MONITORING WELL LOCATION MAP

DRAWING SCALE 0 500 1000 scale feet UNLESS OTHERWISE NOTED

WELL #	NORTHING	EASTING	ELEV
F POND			
FP-1	15492.687	9334.767	453.25
TL4-R	15050.765	9413.462	451.45
FP-2	14925.184	9073.208	446.04
NORTH DITCH STAGING AREA			
NDSA-2	20489.974	9296.460	448.62
NDSA-1	20243.901	9313.923	449.67
T-6A	20569.15	9223.84	451.67
W-2	20180.69	9438.46	451.79

BASE MAP FROM FOTH & DYKE AND ASSOCIATES, INC.

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ENTACT
environmental services
3129 Bass Pro Drive • Grapevine, TX 76051
(972) 550-1323 • Fax (972) 550-7464

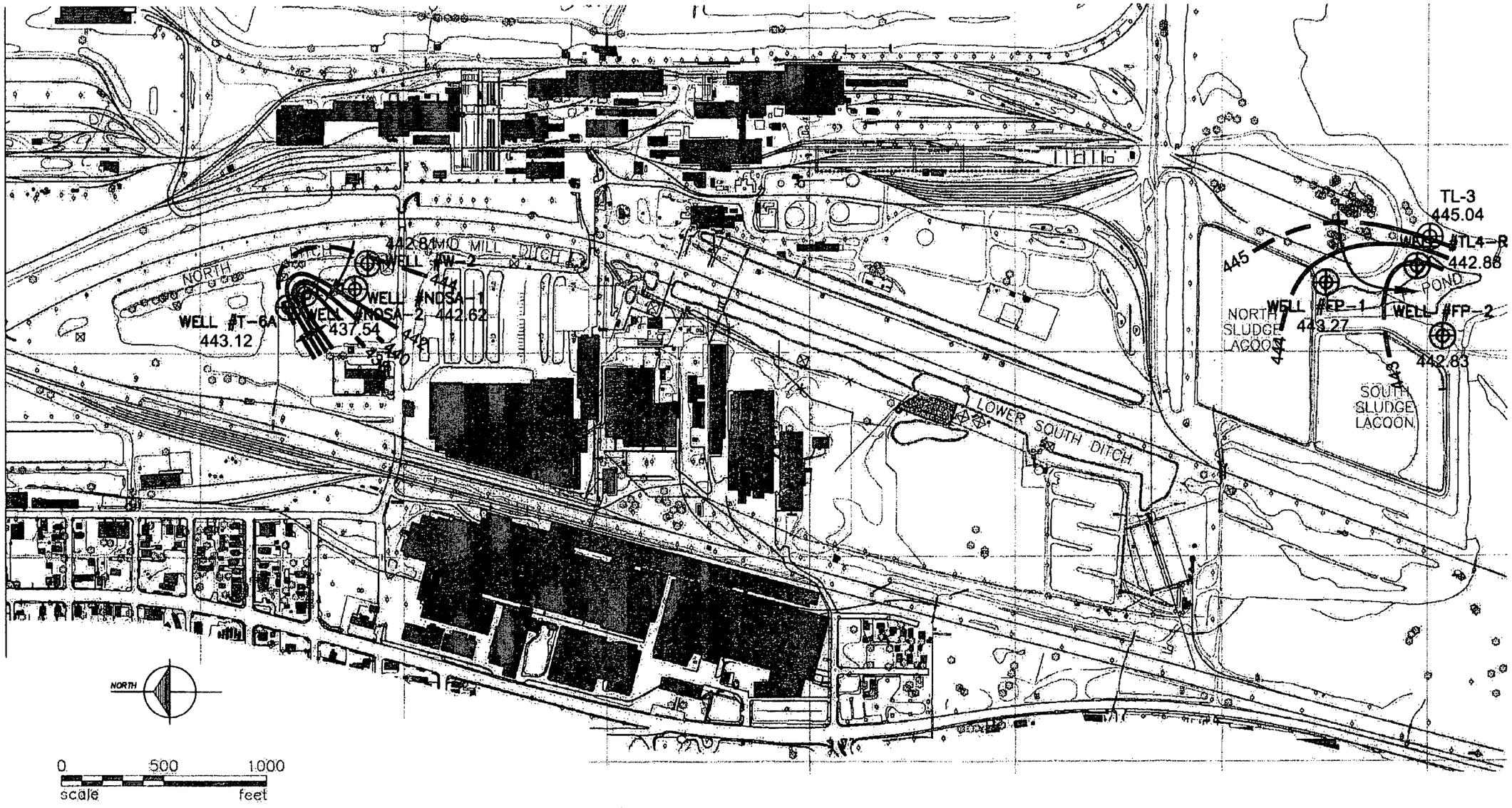
NO.	DATE	REVISION	APP.

Scale: as shown | Drawn By: - | Checked By: - | Date: 2/2007

KEYSTON STEEL & WIRE CO.
PEORIA, IL

FIGURE 1

MONITORING WELL LOCATION MAP



LEGEND

- MONITORING WELL
- 443.12 GROUNDWATER ELEVATION – JANUARY 16, 2007
- 440 POTENTIOMETRIC SURFACE CONTOUR
- GROUNDWATER FLOW DIRECTION

BASE MAP FROM FOTH & VAN DYKE AND ASSOCIATES, INC.

WELL #	NORTHING	EASTING	ELEV
F POND			
FP-1	15492.687	9334.767	453.25
TL4-R	15050.765	9413.462	451.45
FP-2	14925.184	9073.208	446.04
NORTH DITCH STAGING AREA			
NDSA-2	20489.974	9296.460	448.62
NDSA-1	20243.901	9313.923	449.67
T-6A	20569.15	9223.84	451.67
W-2	20180.69	9438.46	451.79

POTENTIOMETRIC SURFACE MAP
F-POND AND
NORTH DITCH STAGING AREA
JANUARY 16, 2007

KEYSTONE STEEL & WIRE CO.
PEORIA, ILLINOIS

Date 04-07
Project No. 95150

EarthTech
A tyco International Ltd. Company

Figure 2

L:\work\95150\Dwg\pot011607.dwg 04/19/07 1:13 PM nancy.wilzbacher

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

April 17, 2007

REPLY TO THE ATTENTION OF: DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vic Stirnaman
Executive Vice President
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Groundwater Monitoring Letter Report
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Stirnaman

The U.S. EPA has completed the review of your February 5, 2007, Groundwater Monitoring Letter Report for the October 2006 quarterly monitoring event at the Keystone Steel and Wire Company. The report shows that total lead was detected in monitoring well FP-1 at a concentration of 6.6ppb and in monitoring well W-2 at a concentration of 6.5ppb. Total lead was also detected in monitoring well TL4-R at concentrations of 17,000ppb and 18,000ppb. In the report, you attribute the source of the high lead concentration detected in monitoring well TL4-R to originate from the nearby Tail Tracks Landfill. It is your contention that well TL4-R was installed through the cap of the Tail Track Landfill.

Based on the proximity of the Tail Track landfill to well TL4-R, it is **possible** that the high lead concentration detected in well TL4-R could be coming from the landfill. However, this same logic does not apply to the lead detection reported in monitoring wells FP-1 and well W-2. Further evaluation of monitoring wells FP-1 and W-2 must continue and the lead concentration addressed. Your recommendation to close monitoring well TL4-R and install a new replacement monitoring well further downgradient outside the boundary of the tail Track Landfill cap is acceptable. However, the new monitoring well must be installed sufficiently close to the F-Pond to adequately monitor any releases from the pond.

Finally, the letter report indicates that the groundwater samples were analyzed using SW-846 Method 6020. This is a deviation from Section 4.1 of the Field Sampling Plan, presented as Appendix B to the April 2006 Corrective Measures Implementation Workplan, which requires analysis for lead using SW-846 Method 6010B. Keystone should provide detail as to why this deviation was necessary and indicate any expected difficulties associated with comparison of results obtained using the different methods.

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If you have any questions regarding this matter, please contact Jonathan Adenuga at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Waste Pesticides and Toxics Division

Cc: Chad Erdmann, KS&W
Cc: Jim Moore, IEPA
Cc: Booze Allen

ENTACT®
environmental services

3129 Bass Pro Drive
Grapevine, Texas
76051

February 5, 2007

Mr. Jonathan Adenuga
U.S. EPA Region 5, DE-9J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

RE: Groundwater Monitoring Letter Report
October 2006 Quarterly Event
Keystone Steel & Wire Company
7000 SW Adams Street, Peoria, Illinois

Dear Jonathan:

On behalf of the Keystone Steel & Wire Company ("Keystone"), ENTACT Services LLC ("ENTACT") is submitting this Groundwater Monitoring Letter Report for the October 2006 quarterly monitoring event. This letter report discusses the groundwater monitoring results from the October 6, 2006 sampling of the groundwater monitoring wells. This sampling event was required as part of the corrective measures implemented at the F-Pond and North Ditch Staging Area. The following sections describe the sampling procedures, field parameter results and laboratory analytical results for the October 6, 2006 sampling event.

Groundwater Monitoring Event

Groundwater samples were collected by Keystone's groundwater monitoring consultant, EarthTech, from groundwater monitoring wells FP-1, FP-2 and TL4-R at the F-Pond and groundwater monitoring wells NDSA-1, NDSA-2, W-2, and T-6A at the North Ditch Staging Area on October 6, 2006. Groundwater samples were previously collected from these groundwater monitoring wells on July 13, 2006.

A groundwater sample was also collected from groundwater monitoring well TL-3, located to the east of groundwater monitoring well TLR-4 at the F-Pond, on November 29, 2006 to further delineate potential groundwater impacts to the east of the F-Pond.

Refer to Figure 1 for the location of these monitoring wells.

Sampling Procedures

Prior to sampling, water level measurements were taken at each monitoring well with an electronic water level measuring device to determine the depth to groundwater. The calculated static water table elevations were then used to construct a groundwater gradient map for the F-

Pond and North Ditch Staging Area. From this data, it was determined that the groundwater flow direction and gradient at the F-Pond was to the south at 0.0022 feet/foot and to the east at 0.01 feet/foot at the North Ditch Staging Area. A summary of the water level measurements is presented on Table 1 and the groundwater gradient/flow direction and elevations are presented on Figure 1. (The location of monitoring well TL-3 has been included on Figure 1. This well, however, was not used to determine the groundwater gradient and flow direction due to the fact that this well was measured and sampled more than a month after the October 2006 quarterly event.)

After measurement, the monitoring wells were purged and sampled using clean disposable bailers. The depth to groundwater information collected was also used to determine the amount of groundwater required to be removed from each well prior to sampling. At least three well volumes were removed by hand bailing prior to collecting a sample.

Groundwater samples were then collected from each monitoring well and were submitted for laboratory analysis of total and dissolved lead by U.S. EPA Method SW-846 6020. The samples from each monitoring well were collected in two 500 ml plastic containers and preserved with nitric acid. A 0.45 micron filter was used to filter a separate aliquot sample for dissolved lead. A separate aliquot sample was also collected from each monitoring well for field measurements of temperature, pH, conductivity, and turbidity (see Table 2 for the field parameter results). The samples were placed in a cooler with ice under chain-of-custody. The samples were picked up by a laboratory courier for delivery to PDC's laboratory in Peoria, Illinois. The purge water was containerized and transferred to the groundwater monitoring zone treatment system, which ultimately connects to the facility's wastewater treatment system, for disposal.

Analytical Results

The laboratory analytical results indicate that total and dissolved lead concentrations were below the laboratory detection limit of 5 parts per billion (ppb) in monitoring wells TL-3, FP-2, NDSA-1, NDSA-2, and T-6A. Total lead was detected in monitoring well FP-1, located upgradient of the F-Pond, at a concentration of 6.6 ppb and monitoring well W-2, located side gradient of the North Ditch Staging Area, at a concentration of 6.5 ppb.

Total and dissolved lead were also detected in monitoring well TL4-R at concentrations of 17,000 ppb and 18,000 ppb, respectively. This monitoring well replaced monitoring well TL-4 that was initially installed as part of the Environmental Indicators Assessment Investigation conducted in September 2001. Monitoring well TL4-R was installed in the vicinity of monitoring well TL-4 and cross-gradient to the local groundwater flow direction in the area. The elevated lead concentrations in the groundwater at monitoring well TL4-R were also accompanied by an unusually high pH level of 12.49.

The laboratory analytical results are presented on Table 2 and the laboratory analytical reports are included as Attachment 1.

Monitoring Well TL4-R Discussion

In the Keystone response dated April 26, 2000 to the U.S. EPA Administrative Order on Consent (AOC) concerning corrective action requirements at the Keystone facility, there was an extensive discussion of the closed Tail Tracks Landfill. In that discussion, it was related that the landfill received electric arc furnace dust from 1970 to 1976. In 1978, a closure permit for that landfill was received from the Corp of Engineers, the closure plan approval was received from the IEPA Division of Land/Noise Pollution Control and the landfill was closed (October 1978) by installing a clay cap according to the approved closure plan. Groundwater sampling was conducted for 3 years following the closure at 2 shallow and 2 deep monitoring wells downgradient of the landfill. No releases from the landfill were discovered during this sampling.

When the RCRA program was promulgated, Keystone submitted a Notification of Hazardous Waste Site for the landfill to the U.S. EPA in May 1981.

As part of the AOC, soil, surface water and groundwater samples from around the Tail Tracks Landfill were collected and analyzed. The Environmental Indicators Assessment Report submitted in January 2002 stated that these results clearly demonstrated that the Tail Tracks Landfill did not pose a risk to human health or the environment.

Subsequent to closure activities at the F-Pond, adjacent to the Tail Tracks Landfill, additional groundwater sampling has been performed to demonstrate satisfactory closure of the F-Pond. As part of this sampling, groundwater well TL-4 was replaced due to damage to the original well. Samples collected from the 3 existing monitoring wells (FP-1, FP-2 and TL-3) meet groundwater quality requirements. Samples collected from the new well, TL4-R, continue to show high levels of lead and an extraordinarily high pH.

NOT Really what about FP-1 and W-2

NO How do they explain this

It is Keystone's opinion that the fourth well, TL4-R, was inadvertently installed through the cap of the Tail Tracks Landfill. Prior activities at the site have shown that the underlying soils on the site are dense, very low permeability clays and silts that have very effectively prevented the migration of any hazardous constituents. The cap of the Tail Tracks Landfill is constructed of similar material. For only one well to suddenly start exhibiting the high pH values and high lead concentrations detected at monitoring well TL4-R is not logical. The only logical explanation is that the monitoring well TL4-R inadvertently penetrated the landfill cap and waste within the landfill.

Keystone proposes to close monitoring well TL4-R and install a new monitoring well further down-gradient at a location clearly outside the boundary of the Tail Tracks Landfill cap. This

new monitoring well will be sampled on a quarterly basis after the completion of the 4th quarterly sampling event to demonstrate satisfactory closure of the F-Pond and to assure that no hazardous constituents have been released from the Tail Tracks Landfill.

Conclusions

Per the requirements of Sections 3.2.9 and 3.3.8 of the *Corrective Measures Implementation Workplan, Revision 2.0* dated April 17, 2006, groundwater monitoring will be conducted on a quarterly basis for a period of one year. The 3rd quarter groundwater monitoring event was scheduled for late January 2007. For the 3rd quarter groundwater monitoring event and subsequent quarterly events, groundwater monitoring well TL-3 will also be sampled.

Keystone also proposes to close monitoring well TL4-R and install a new groundwater monitoring well further downgradient. The replacement well will be installed to the south of the original well, TL-4, and outside of the footprint of the Tail Tracks Landfill (see Figure 2 for the approximate location). The new groundwater monitoring well will be sampled during the 4th quarter groundwater monitoring event and on a quarterly basis for an additional year. The samples will be submitted to an analytical laboratory for analysis of total and dissolved lead and the results will be forwarded to U.S. EPA for review.

If you have any questions or concerns regarding this addendum, please feel free to contact me at (972) 580-1323 or Chad Erdmann with Keystone at (309) 697-7165.

Respectfully,

Jenny Self

Jenny Self, P.G.
ENTACT Services LLC

Attachments

cc: Chad Erdmann, Keystone Steel & Wire Company
Jim Moore, IEPA
Thad Slaughter, ENTACT Services, LLC

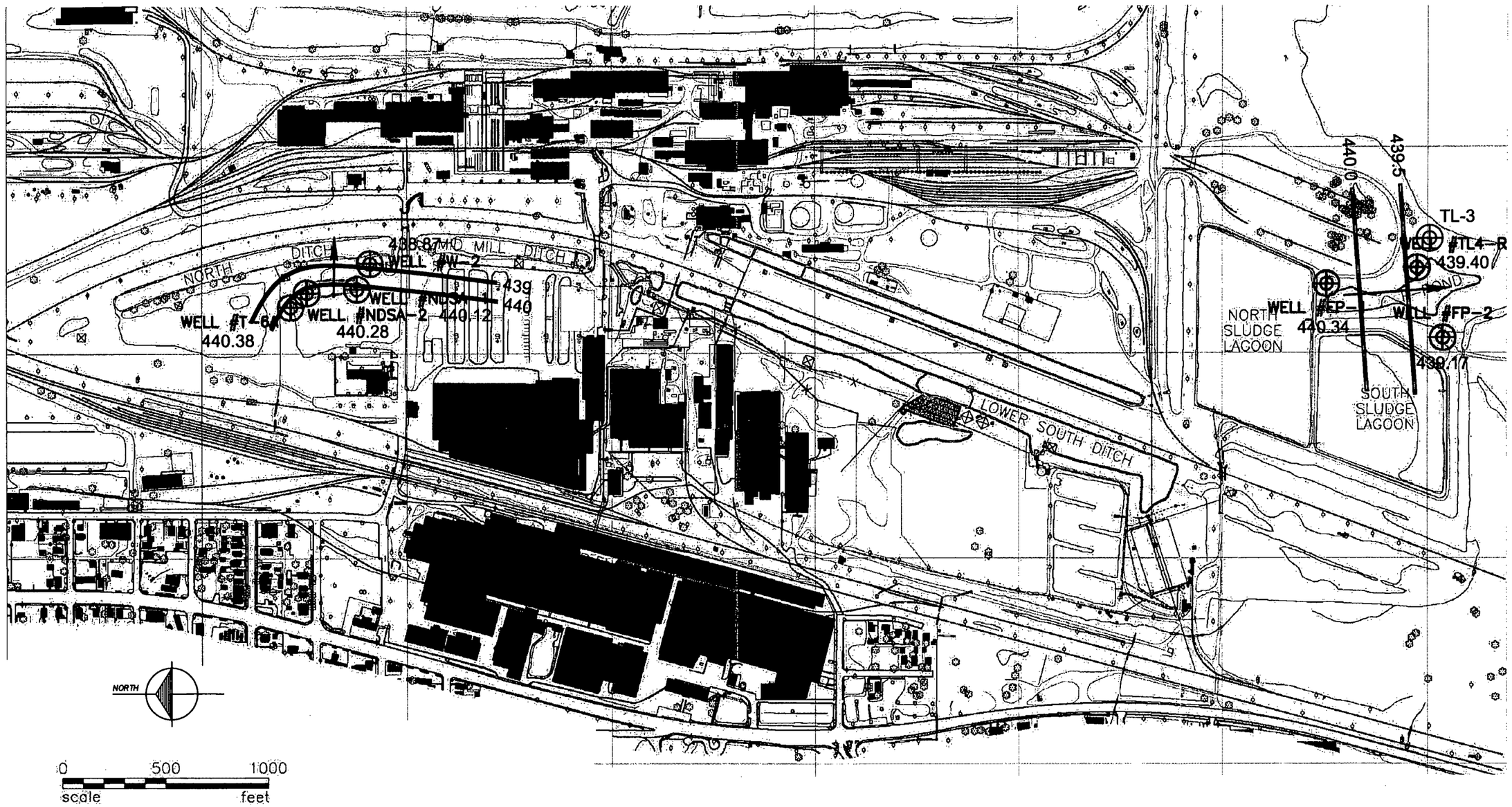
TABLE 1
Water Level Measurements for Groundwater Monitoring Wells
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

Monitoring Well ID No.	Installation/ Sample Date	Ground Elevation (ft amsl)	TOC Elevation (ft amsl)	Standpipe Stickup (+) Stickdown (-)	Depth to Water (ft from gs)	Depth to Water (ft from TOC)	Water Elevation (ft amsl)
FP-1	05/02/06	450.75	453.25	+2.50			
	07/13/06				9.94	12.44	440.81
	10/05/06				10.41	12.91	440.34
FP-2	05/03/06	443.54	446.04	+2.50			
	07/13/06				4.72	7.22	438.82
	10/05/06				4.37	6.87	439.17
TL4-R	05/03/06	448.95	451.45	+2.50			
	07/13/06				9.53	12.03	439.42
	10/05/06				9.55	12.05	439.40
TL-3	09/18/01	444.01	446.60	+2.59			
	11/28/06				2.55	5.14	441.46
NDSA-1	05/02/06	449.67	449.67	0			
	07/13/06				9.08	9.08	440.59
	10/05/06				9.55	9.55	440.12
NDSA-2	05/02/06	448.62	448.62	0			
	07/13/06				9.87	9.87	438.75
	10/05/06				8.34	8.34	440.28
T-6A	11/06/89	449.10	451.67	2.57			
	07/13/06				8.30	10.87	440.80
	10/05/06				8.72	11.29	440.38
W-2	01/15/86	448.60	451.79	3.19			
	07/13/06				9.61	12.80	438.99
	10/05/06				9.73	12.92	438.87

TABLE 2
Field Parameter and Laboratory Analytical Results for Groundwater Samples
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

MW ID No.	Sample Date	Total Lead (ug/l)	Dissolved Lead (ug/l)	pH (s.u.)	Conductivity (mS/cm)	Turbidity (NTU)	Temperature (°C)	Comments
F-Pond Monitoring Wells								
FP-1	07/13/06	13	<5	7.58	1.94	175	21.1	
	10/06/06	6.6	<5	7.43	1.56	9	15.1	
FP-2	07/13/06	<5	<5	6.05	2.27	118	20.3	
	10/06/06	<5	<5	6.65	2.06	6	15.1	
	10/06/06	<5	<5	6.71	2.02	9	15.9	Duplicate
TLR-4	07/13/06	11000	8800	11.41	5.43	120	21.4	
	10/06/06	17000	18000	12.49	4.40	17	17.0	
TL-3	11/29/06	<5	<5	7.23	1.96	114	17.1	
North Ditch Staging Area Monitoring Wells								
NDSA-1	07/13/06	<5	<5	5.46	0.95	15	20.3	
	10/06/06	<5	<5	6.52	0.944	11	17.1	
NDSA-2	07/13/06	<5	<5	5.98	0.99	3	20.3	
	10/06/06	<5	<5	6.75	0.934	6	16.7	
T-6A	07/13/06	<5	<5	5.67	1.29	15	19.0	
	07/13/06	<5	<5	5.57	1.32	26	19.7	Duplicate
	10/06/06	<5	<5	6.67	1.18	11	15.4	
W-2	07/13/06	<5	<5	5.81	1.45	106	20.3	
	10/06/06	6.5	<5	7.22	1.34	8	15.1	

Notes:
<: Less than the detection limit



LEGEND

- MONITORING WELL
- 440.12 GROUNDWATER ELEVATION – OCTOBER 6, 2006
- 440 POTENTIOMETRIC SURFACE CONTOUR
- GROUNDWATER FLOW DIRECTION

BASE MAP FROM FOTH & VAN DYKE AND ASSOCIATES, INC.

WELL #	NORTHING	EASTING	ELEV
F POND			
FP-1	15492.687	9334.767	453.25
TL4-R	15050.765	9413.462	451.45
FP-2	14925.184	9073.208	446.04
NORTH DITCH STAGING AREA			
NDSA-2	20489.974	9296.460	448.62
NDSA-1	20243.901	9313.923	449.67
T-6A	20569.15	9223.84	451.67
W-2	20180.69	9438.46	451.79

POTENTIOMETRIC SURFACE MAP F-POND AND NORTH DITCH STAGING AREA OCTOBER 6, 2006

KEYSTONE STEEL & WIRE CO.
PEORIA, ILLINOIS

Date 01-07	EarthTech	Figure
Project No. 82780	A tyco International Ltd. Company	1

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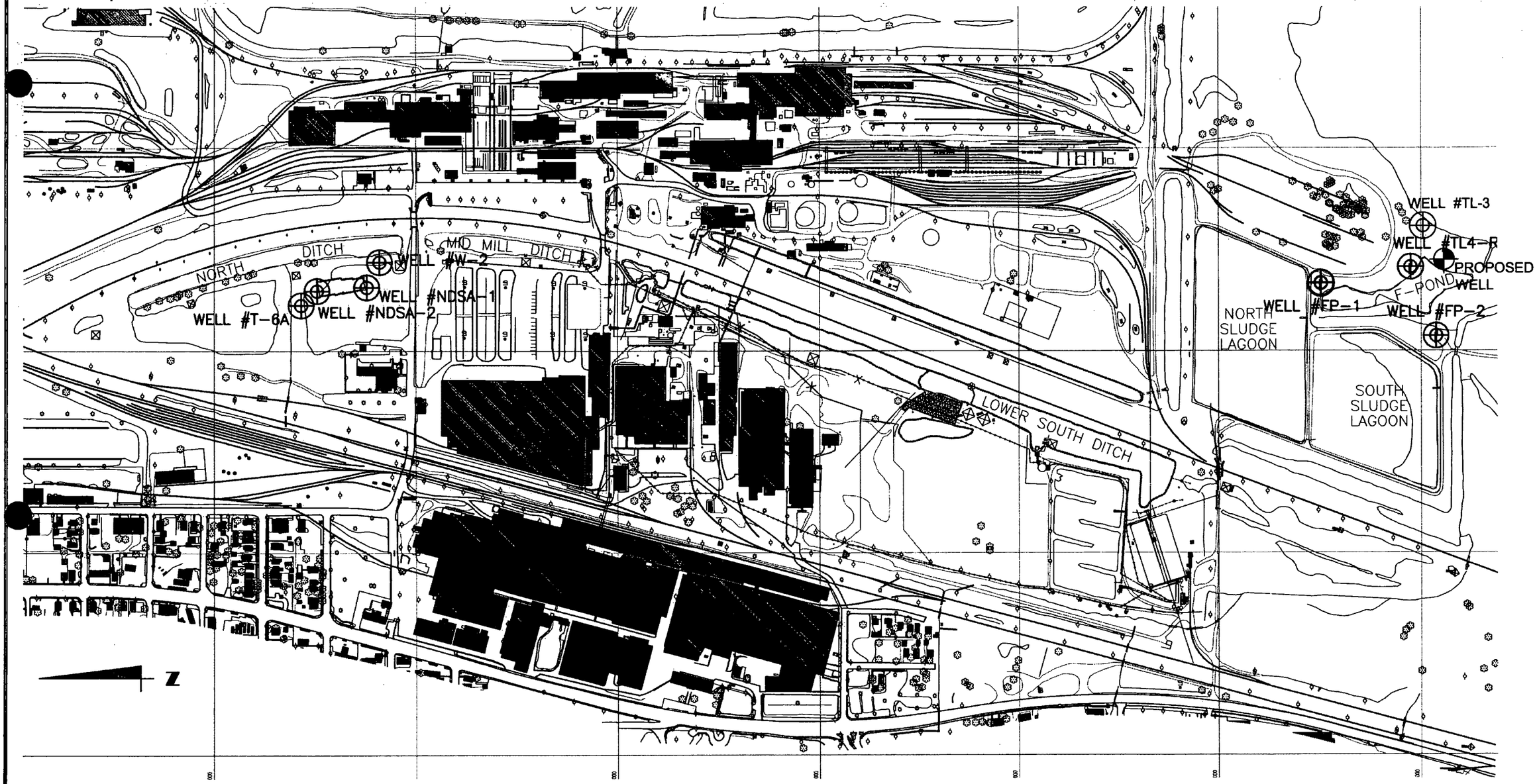

LEGEND

MONITORING WELL

PROPOSED MONITORING WELL

MONITORING WELL LOCATION MAP

DRAWING SCALE 0 500 1000 scale feet UNLESS OTHERWISE NOTED

WELL #	NORTHING	EASTING	ELEV
F POND			
FP-1	15492.687	9334.767	453.25
TL4-R	15050.765	9413.462	451.45
FP-2	14925.184	9073.208	446.04
NORTH DITCH STAGING AREA			
NDSA-2	20489.974	9296.460	448.62
NDSA-1	20243.901	9313.923	449.67
T-6A	20569.15	9223.84	451.67
W-2	20180.69	9438.46	451.79

BASE MAP FROM FOTH & DYKE AND ASSOCIATES, INC.

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ENTACT environmental services
3129 Bass Pro Drive • Grapevine, TX 76051
(972) 580-1323 • Fax (972) 550-7484

NO.	DATE	REVISION	APP.

Scale: as shown | Drawn By: – | Checked By: – | Date: 2/2/07

KEYSTON STEEL & WIRE CO.
PEORIA, IL

FIGURE 2

MONITORING WELL LOCATION MAP

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

October 19, 2006

Mr. Andy Duwelius
Earth Tech
5010 Stone Mill Road
Bloomington, IN 47408

Dear Mr. Duwelius:

Enclosed is the quality control deliverables for the October 6, 2006 groundwater sampling event at Keystone Steel & Wire F-Pond. If you have any questions, please call.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

XC: Mr. Chad Erdman, Keystone Steel & Wire Co.

recycled paper

EARTH TECH
BLOOMINGTON, IN

KEYSTONE STEEL & WIRE CO.
F-POND

SAMPLING EVENT:
OCTOBER 6, 2006

REPORT DATE:
OCTOBER 19, 2006

TABLE OF CONTENTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

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CASE NARRATIVE

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

To: Earth Tech

Facility: Keystone Steel & Wire Company, Project Number 95150.01

INORGANICS CASE NARRATIVE

Seven groundwater samples and one duplicate sample were received on October 6, 2006 for analysis in accordance with our Level II protocol. Samples arrived in good condition with a cooler temperature of 4°C. The samples were analyzed for Lead, Total and Dissolved (SW-846 Method 6010B).

The analysis was performed according to protocol and within the maximum allowable holding times. The samples were analyzed on October 18, 2006.

Matrix spike and matrix spike duplicate analyses was not performed on this sample data group. The recoveries for accuracy and precision were within their required QC limits. Recoveries on the other quality control parameters (blanks, controls, verifications, etc.) were within the required QC limits.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

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COVER PAGE

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Form 0

INORGANIC ANALYSIS COVER PAGE

Client Sample ID	Lab Sample ID	Date Collected	Final Date Analyzed
W-2	06101800-1	06-Oct-06	18-Oct-06
NDSA-1	06101800-2	06-Oct-06	18-Oct-06
NDSA-2	06101800-3	06-Oct-06	18-Oct-06
T-6A	06101800-4	06-Oct-06	18-Oct-06
FP-2	06101800-5	06-Oct-06	18-Oct-06
FP-2 Dup	06101800-6	06-Oct-06	18-Oct-06
FP-1	06101800-7	06-Oct-06	18-Oct-06
TL-4R	06101800-8	06-Oct-06	18-Oct-06

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

State where samples collected IL

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT) - (SAMPLE ACCEPTANCE POLICY ON REVERSE)

1

PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED
95150.01		DELIVERED
PHONE NUMBER	**FAX NUMBER**	**DATE SHIPPED**
812-336-0972	812-3363991	9-6-06

MATRIX TYPES:
WW-WASTEWATER
DW-DRINKING WATER
GW-GROUND WATER
WWSL-SLUDGE
NAS-SOLID
L'CHT-LEACHATE
OTHER:

3

4 (FOR LAB USE ONLY)
LOGIN # 06101800-8
LOGGED BY: UB
LAB PROJ. #
TEMPLATE:
PROJ. MGR.:

2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	BOTTLE COUNT	TOTAL LEAD	DISSOLVED LEAD	DL = 5.0ug/L					REMARKS
W-2	10-6-06	0700	X		GW	2	X	X						
NDSA-1	10-6-06	0710	X		GW	2	X	X						
NDSA-2	10-6-06	0723	X		GW	2	X	X						
T-6A	10-6-06	0740	X		GW	2	X	X						
FP-2	10-6-06	0800	X		GW	2	X	X						
FP-2 DUP	10-6-06	0800	X		GW	2	X	X						
FP-1	10-6-06	0818	X		GW	2	X	X						
TL-4R	10-6-06	0834	X		GW	2	X	X						
CC LAB REPORT TO														
GNAD R. ERDMANN @ KEYSTONE														

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) NORMAL RUSH DATE RESULTS NEEDED
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.*

7

RELINQUISHED BY: (SIGNATURE)	DATE / TIME	RECEIVED BY: (SIGNATURE)	DATE / TIME
John A. Dunvelius	DATE 10-6-06 TIME 1043		
RELINQUISHED BY: (SIGNATURE)	DATE / TIME	RECEIVED AT LAB BY: (SIGNATURE) [signature]	DATE 10-6-06 TIME 10:43

8 COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT 4 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) Y OR N
(EXCLUDES TYPICAL FIELD PARAMETERS)
DATE AND TIME TAKEN FROM SAMPLE BOTTLE

Copies: white should accompany samples to PDC Labs. Yellow copy to be retained by the client.

00000004

TABULATED ANALYTICAL RESULTS

PDC Laboratories, Inc.
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Report Cover Page

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404

Attn: Mr. Andy Duwelius

Date Received: 06-Oct-06
Date Reported: 20-Oct-06
PO #:
PDC Cust. # : 205746

Login No. 06101800

This report includes information regarding the following described samples as received by the laboratory and is only valid for the parameters tested. This report contains 8 results page(s) not including the cover page(s).

Sample No.	Client ID	Site	Locator
06101800-1	HAZ. WST. MGMT UNIT W-2		KEYSTONE STEEL
06101800-2	HAZ. WST. MGMT UNIT NDSA-1		KEYSTONE STEEL
06101800-3	HAZ. WST. MGMT UNIT NDSA-2		KEYSTONE STEEL
06101800-4	HAZ. WST. MGMT UNIT T-6A		KEYSTONE STEEL
06101800-5	HAZ. WST. MGMT UNIT FP-2		KEYSTONE STEEL
06101800-6	HAZ. WST. MGMT UNIT FP-2 DUP		KEYSTONE STEEL
06101800-7	HAZ. WST. MGMT UNIT FP-1		KEYSTONE STEEL
06101800-8	HAZ. WST. MGMT UNIT TL-4R		KEYSTONE STEEL

Certified by: Gail J. Schindler
Gail J. Schindler, Project Manager

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NELAC Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230

State of Illinois Certification for Bacteriological Analysis in Drinking Water -Lab Registry No. S/B 17553
Drinking Water Certifications: Indiana (C-IL-04); Kansas (E-10338); Kentucky (90058); Missouri (00870); Wisconsin (998284430)
Wastewater Certifications: Arkansas; Iowa (240); Kansas (E-10338); Wisconsin (998284430)
Hazardous/Solid Waste Certifications: Arkansas; Kansas (E-10338); Wisconsin (998284430)
UST Certification: Iowa (240)
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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404

Attn: Mr. Andy Duwelius

Date Received: 06-Oct-06
Date Reported: 20-Oct-06
PO #:
PDC Cust. # : 205746

Login No. 06101800

Sample No: 06101800-1
Client ID: HAZ. WST. MGMT UNIT
Site: W-2
Locator: KEYSTONE STEEL
Collect Date: 06-OCT-06 07:00

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				16-Oct-06 13:00	DAB
SW-846 METHOD 6010B					
Lead		6.5	ug/l	18-Oct-06 10:51	JVH
Lead, Dissolved	U	5.0	ug/l	18-Oct-06 09:42	JVH

00000006

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404

Attn: Mr. Andy Duwelius

Date Received: 06-Oct-06
Date Reported: 20-Oct-06
PO #:
PDC Cust. # : 205746

Login No. 06101800

Sample No: 06101800-2
Client ID: HAZ. WST. MGMT UNIT
Site: NDSA-1
Locator: KEYSTONE STEEL
Collect Date: 06-OCT-06 07:10

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				16-Oct-06 13:00	DAB
SW-846 METHOD 6010B					
Lead	U	5.0	ug/l	18-Oct-06 10:56	JVH
Lead, Dissolved	U	5.0	ug/l	18-Oct-06 09:45	JVH

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404

Attn: Mr. Andy Duwelius

Date Received: 06-Oct-06
Date Reported: 20-Oct-06
PO #:
PDC Cust. # : 205746

Login No. 06101800

Sample No: 06101800-3
Client ID: HAZ. WST. MGMT UNIT
Site: NDSA-2
Locator: KEYSTONE STEEL
Collect Date: 06-OCT-06 07:23

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				16-Oct-06 13:00	DAB
SW-846 METHOD 6010B					
Lead	U	5.0	ug/l	18-Oct-06 11:01	JVH
Lead, Dissolved	U	5.0	ug/l	18-Oct-06 09:49	JVH

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Laboratory Results

Earth Tech
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Attn: Mr. Andy Duwelius

Date Received: 06-Oct-06
Date Reported: 20-Oct-06
PO #:
PDC Cust. # : 205746

Login No. 06101800

Sample No: 06101800-4
Client ID: HAZ. WST. MGMT UNIT
Site: T-6A
Locator: KEYSTONE STEEL
Collect Date: 06-OCT-06 07:40

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				16-Oct-06 13:00	DAB
SW-846 METHOD 6010B					
Lead	U	5.0	ug/l	18-Oct-06 11:05	JVH
Lead, Dissolved	U	5.0	ug/l	18-Oct-06 09:52	JVH

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404

Attn: Mr. Andy Duwelius

Date Received: 06-Oct-06
Date Reported: 20-Oct-06
PO #:
PDC Cust. # : 205746

Login No. 06101800

Sample No: 06101800-5
Client ID: HAZ. WST. MGMT UNIT
Site: FP-2
Locator: KEYSTONE STEEL
Collect Date: 06-OCT-06 08:00

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				16-Oct-06 13:00	DAB
SW-846 METHOD 6010B					
Lead	U	5.0	ug/l	18-Oct-06 11:09	JVH
Lead, Dissolved	U	5.0	ug/l	18-Oct-06 09:56	JVH

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404

Attn: Mr. Andy Duwelius

Date Received: 06-Oct-06
Date Reported: 20-Oct-06
PO #:
PDC Cust. # : 205746

Login No. 06101800

Sample No: 06101800-6
Client ID: HAZ. WST. MGMT UNIT
Site: FP-2 DUP
Locator: KEYSTONE STEEL
Collect Date: 06-OCT-06 08:00

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				16-Oct-06 13:00	DAB
SW-846 METHOD 6010B					
Lead	U	5.0	ug/l	18-Oct-06 11:14	JVH
Lead, Dissolved	U	5.0	ug/l	18-Oct-06 10:00	JVH

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404

Attn: Mr. Andy Duwelius

Date Received: 06-Oct-06
Date Reported: 20-Oct-06
PO #:
PDC Cust. # : 205746

Login No. 06101800

Sample No: 06101800-7
Client ID: HAZ. WST. MGMT UNIT
Site: FP-1
Locator: KEYSTONE STEEL
Collect Date: 06-OCT-06 08:18

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				16-Oct-06 13:00	DAB
SW-846 METHOD 6010B					
Lead		6.6	ug/l	18-Oct-06 11:18	JVH
Lead, Dissolved	U	5.0	ug/l	18-Oct-06 10:03	JVH

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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404

Attn: Mr. Andy Duwelius

Date Received: 06-Oct-06
Date Reported: 20-Oct-06
PO #:
PDC Cust. # : 205746

Login No. 06101800

Sample No: 06101800-8
Client ID: HAZ. WST. MGMT UNIT
Site: TL-4R
Locator: KEYSTONE STEEL
Collect Date: 06-OCT-06 08:34

Parameter	Result	Units	Date	By
SW-846 METHOD 3015				
Sample Preparation			16-Oct-06 13:00	DAB
SW-846 METHOD 6010B				
Lead	17000	ug/l	18-Oct-06 11:22	JVH
Lead, Dissolved	18000	ug/l	18-Oct-06 10:10	JVH

DATA QUALIFIERS APPLICABLE TO THE "STANDARD QC" PROGRAM

A The presence of this analyte was confirmed using a second column but there was a disparity (> 40% RPD) between the two sets of results with no apparent chromatographic anomalies. The lower of the two results was reported.

B _____ present in the method blank at _____.

C The batch control sample failed to meet the required acceptance criteria.

D Result obtained through analysis of a sample dilution.

E Concentration exceeds the instrument calibration range.

F Internal standard area failed to meet the required acceptance criteria in repeat instrumental analyses. Results should be interpreted as estimated concentrations.

G The Method of Standard Additions (MSA) was used to quantify the concentration.

H Test performed after the expiration of the appropriate regulatory/advisory maximum allowable hold time.

J Estimated value; value between the MDL and the RDL.

M Analyte failed to meet the required acceptance criteria for duplicate analysis.

P Chemical preservation discrepancy noted at the time of analysis.

Q Analyte failed to meet the required acceptance criteria for spike recovery in the Matrix Spike (MS) and Matrix Spike Duplicate (MSD) due to apparent matrix effects.

R Analyte failed to meet the required acceptance criteria for relative percent difference (RPD) between the Matrix Spike and Matrix Spike Duplicate (MS/MSD).

S Surrogate compound diluted below a reliable quantitation level.

T Surrogate recovery failed to meet the required acceptance criteria in initial analysis. Sample was re-extracted (if applicable) and re-analyzed, and the surrogate recovery was outside of the required acceptance criteria on the second analysis, also. Results should be interpreted as estimated concentrations.

U Parameter was analyzed for, but not detected above the reporting limit.

V Verification standard recovery failed to meet the required acceptance criteria on repeat instrumental analyses.

W Surrogate recovery failed to meet the required acceptance criteria in initial analysis. Sample was re-extracted (if applicable) beyond the maximum allowable hold time, and re-analyzed. The surrogate recovery was within the required acceptance criteria on this second analysis.

NA Not analyzed.

NR Not requested.

X Miscellaneous; see comments.

TOTAL METALS
QUALITY CONTROL DOCUMENTATION

PDC Laboratories, Inc.

Metals Data Reporting Form

Initial Calibration Verification Standar

SDG: 06101800TOTA

Instrument: ICPST

Units: ug/L

Chart Number: 101806TO.ARC

Acceptable Range: 90% - 110%

Standard Source: Inorganic Ventures

Standard ID: TS8-41A

Element	WL/ Mass	True Conc	ICV 10/18/2006 8:53 AM Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec
Lead	220.353	4000.0	4080.20	102.0								

PDC Laboratories, Inc.

Metals Data Reporting Form

Continuing Calibration Verification **SDG:** 06101800TOTA

Instrument: ICPST **Units:** ug/L

Chart Number: 101806TO.ARC **Acceptable Range:** 90% - 110%

Standard Source: Inorganic Ventures **Standard ID:** TS8-41A

Element	WL/ Mass	True Conc	CCV 10/18/2006 10:35 AM		CCV 10/18/2006 11:25 AM							
			Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec
Lead	220.353	4000.0	4064.84	101.6	4146.74	103.7						

PDC Laboratories, Inc.

Metals Data Reporting Form

Initial Calibration Blank Results **SDG:** 06101800TOTA

Instrument: ICPST **Units:** ug/L

Chart Number: 101806TO.ARC

Standard Source: NA **Standard ID:** NA

Element	WL/ Mass	Report Limit	ICB 10/18/2006 8:58 AM									
			Found	Q	Found	Q	Found	Q	Found	Q	Found	Q
Lead	220.353	5	0.9	U								

U Result is less than the IDL

B Result is between IDL and RL

PDC Laboratories, Inc.

Metals Data Reporting Form

Continuing Calibration Blank Result **SDG:** 06101800TOTA

Instrument: ICPST **Units:** ug/L

Chart Number: 101806TO.ARC

Standard Source: NA **Standard ID:** NA

Element	WL/ Mass	Report Limit	CCB 10/18/2006 10:38 AM Found	Q	CCB 10/18/2006 12:03 PM Found	Q	Found	Q	Found	Q	Found	Q
Lead	220.353	5	-1.7	B	0.9	U						

U Result is less than the IDL
B Result is between IDL and RL

Form 3 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Preparation Blank Results **SDG:** 06101800TOTA

Lab Sample ID: MB-10/16-1

Matrix: Water **Units:** ug/L **Prep Date:** 10/16/2006 **Prep Batch:** 29

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.353	0.95	5.6	-1.5	B	1.11	ICPST	10/18/2006	10:44

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL

Form 3 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Laboratory Control Sample Results **SDG:** 06101800TOTA

Lab Sample ID: LCS-10/16-1

Matrix: Water **Units:** ug/L **Prep Date:** 10/16/2006 **Prep Batch:** 29

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	Spike Level	Conc	Percent Recovery	Q	Range	DF	Instr	Anal Date	Anal Time
Lead	220.353	555	603	108.7		80-120	1.11	ICPST	10/18/2006	10:48

Comments:

U Result is less than the IDL

B Result is between IDL and RL

Form 7 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Instrument Detection Limits **SDG:** 06101800TOTA

Instrument: ICPST **Units:** ppb

Element	Wavelength	Reporting Limit	MDL	Date of MDL
Lead	220.353	5.0	0.86	7/18/2006

DISSOLVED METALS
QUALITY CONTROL DOCUMENTATION

PDC Laboratories, Inc.

Metals Data Reporting Form

Initial Calibration Verification Standar

SDG: 06101800SOLU

Instrument: ICPST

Units: ug/L

Chart Number: 101806AS.ARC

Acceptable Range: 90% - 110%

Standard Source: Inorganic Ventures

Standard ID: TS8-41A

Element	WL/ Mass	True Conc	ICV 10/18/2006 8:53 AM Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec
Lead	220.353	4000.0	4080.20	102.0								

PDC Laboratories, Inc.

Metals Data Reporting Form

Continuing Calibration Verification **SDG:** 06101800SOLU

Instrument: ICPST **Units:** ug/L

Chart Number: 101806AS.ARC **Acceptable Range:** 90% - 110%

Standard Source: Inorganic Ventures **Standard ID:** TS8-41A

Element	WL/ Mass	True Conc	CCV 10/18/2006 10:35 AM Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec
Lead	220.353	4000.0	4064.84	101.6								

PDC Laboratories, Inc.

Metals Data Reporting Form

Initial Calibration Blank Results **SDG:** 06101800SOLU

Instrument: ICPST **Units:** ug/L

Chart Number: 101806AS.ARC

Standard Source: NA **Standard ID:** NA

Element	WL/ Mass	Report Limit	ICB 10/18/2006 8:58 AM Found	Q	Found	Q	Found	Q	Found	Q	Found	Q
Lead	220.353	5	0.9	U								

5.04.0

U Result is less than the IDL
B Result is between IDL and RL

Form 3 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Continuing Calibration Blank Result **SDG:** 06101800SOLU

Instrument: ICPST **Units:** ug/L

Chart Number: 101806AS.ARC

Standard Source: NA **Standard ID:** NA

Element	WL/ Mass	Report Limit	CCB 10/18/2006 10:38 AM Found	Q	Found	Q	Found	Q	Found	Q	Found	Q
Lead	220.353	5	-1.7	B								

U Result is less than the IDL
B Result is between IDL and RL

Form 3 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Instrument Detection Limits **SDG:** 06101800SOLU

Instrument: ICPST **Units:** ppb

Element	Wavelength	Reporting Limit	MDL	Date of MDL
Lead	220.353	5.0	0.86	7/18/2006

PDC Laboratories, Inc.

Metals Data Reporting Form

Laboratory Control Sample Results **SDG:** 06101800SOLU

Lab Sample ID: LCS-10/17-1

Matrix: Water **Units:** ug/L **Prep Date:** 10/17/2006 **Prep Batch:** WG130749

Weight: NA **Volume:** NA **Percent Moisture:** NA

Element	WL/ Mass	Spike Level	Conc	Percent Recovery	Q	Range	DF	Instr	Anal Date	Anal Time
Lead	220.353	500	511	102.3		80-120	1	ICPST	10/18/2006	9:28

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

Form 7 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Preparation Blank Results **SDG:** 06101800SOLU

Lab Sample ID: MB-10/17-1

Matrix: Water **Units:** ug/L **Prep Date:** 10/17/2006 **Prep Batch:** WG130749

Weight: NA **Volume:** NA **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.353	0.86	5.0	-2.4	B	1	ICPST	10/18/2006	9:25

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

Form 3 Equivalent

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ACCREDITED IN ACCORDANCE WITH nelac

December 8, 2006

Mr. Andy Duwelius
Earth Tech
5010 Stone Mill Road
Bloomington, IN 47408

Dear Mr. Duwelius:

Enclosed is the quality control deliverables for the November 29, 2006 sampling of TL-3 at Keystone Steel & Wire Company. If you have any questions, please call.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

XC: Mr. Chad Erdmann, Keystone Steel & Wire Co.

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EARTH TECH
BLOOMINGTON, IN

KEYSTONE STEEL & WIRE CO.
TL-3

SAMPLING EVENT:
NOVEMBER 29, 2006

REPORT DATE:
DECEMBER 8, 2006

TABLE OF CONTENTS

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CASE NARRATIVE

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
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ACCREDITED IN ACCORDANCE WITH nelac

To: Earth Tech

Facility: Keystone Steel & Wire Company, Project Number 1272

INORGANICS CASE NARRATIVE

One groundwater sample labeled TL-3 was received on November 29, 2006 for analysis in accordance with our Level II protocol. The sample arrived in good condition with a cooler temperature of 18°C. The sample was analyzed for Lead, Total and Dissolved (SW-846 Method 6020).

The analysis was performed according to protocol and within the maximum allowable holding times. The sample was analyzed on December 6-7, 2006.

Matrix spike and matrix spike duplicate analyses was performed for Lead Dissolved. The recoveries for accuracy and precision were within their required QC limits. Recoveries on the other quality control parameters (blanks, controls, verifications, etc.) were within the required QC limits.

Sincerely,

PDC LABORATORIES, INC.

Gail J Schindler

Gail J. Schindler
Project Manager

COVER PAGE

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Form 0

INORGANIC ANALYSIS COVER PAGE

Client Sample ID	Lab Sample ID	Date Collected	Final Date Analyzed
TL-3	06113968-1	29-Nov-06	07-Dec-06

CHAIN OF CUSTODY

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

State where samples collected IL

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT) - (SAMPLE ACCEPTANCE POLICY ON REVERSE)

1

PROJECT NUMBER	P.O. NUMBER	MEANS SHIPPED
1272		11-29-06
PHONE NUMBER	**FAX NUMBER**	**DATE SHIPPED**
812-336-0972		PICK UP

MATRIX TYPES:
WW-WASTEWATER
DW-DRINKING WATER
GW-GROUND WATER
WWSL-SLUDGE
NAS-SOLID
L'CHT-LEACHATE
OTHER:

3

4 (FOR LAB USE ONLY)
LOGIN # 06113968-1
LOGGED BY: BMM
LAB PROJ. #
TEMPLATE:
PROJ. MGR.:

2

SAMPLE DESCRIPTION AS YOU WANT ON REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	BOTTLE COUNT	TOTAL LEAD	DIS. LEAD	D.L. 5.0ug/L					REMARKS
TL-3	11-29-06	0805	X		GW	2	X	X						CC CHAD ERDMAN W/ REPORT

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) NORMAL RUSH DATE RESULTS NEEDED
RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 *The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature.* _____

7

RELINQUISHED BY: (SIGNATURE)	DATE / TIME	RECEIVED BY: (SIGNATURE)	DATE / TIME
RELINQUISHED BY: (SIGNATURE)	DATE / TIME	RECEIVED BY: (SIGNATURE)	DATE / TIME
RELINQUISHED BY: (SIGNATURE)	DATE / TIME	RECEIVED AT LAB BY: (SIGNATURE) D. Martinez	DATE 11-29-06 TIME 12:13

8 COMMENTS: (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT 18 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) Y OR N
DATE AND TIME TAKEN FROM SAMPLE BOTTLE _____

Copies: white should accompany samples to PDC Labs. Yellow copy should be retained by the client.

PAGE 1 OF 1

00000004

TABULATED ANALYTICAL RESULTS

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Report Cover Page

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404

Attn: Mr. Andy Duwelius

Date Received: 29-Nov-06
Date Reported: 08-Dec-06
PO #:
PDC Cust. # : 205746

Login No. 06113968

This report includes information regarding the following described samples as received by the laboratory and is only valid for the parameters tested. This report contains 1 results page(s) not including the cover page(s).

Sample No.	Client ID	Site	Locator
06113968-1	PROJ #1272	TL-3	KEYSTONE F POND

Certified by: Gail J. Schindler
Gail J. Schindler, Project Manager

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Wastewater Certifications: Arkansas; Iowa (240); Kansas (E-10338); Wisconsin (998284430)
Hazardous/Solid Waste Certifications: Arkansas; Kansas (E-10338); Wisconsin (998284430)
UST Certification: Iowa (240)
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Laboratory Results

Earth Tech
5010 Stone Mill Rd.

Bloomington, IN 47404

Attn: Mr. Andy Duwelius

Date Received: 29-Nov-06
Date Reported: 08-Dec-06
PO #:
PDC Cust. # : 205746

Login No. 06113968

Sample No: 06113968-1
Client ID: PROJ #1272
Site: TL-3
Locator: KEYSTONE F POND
Collect Date: 29-NOV-06 08:05

Parameter		Result	Units	Date	By
SW-846 METHOD 6020					
Lead	U	5.0	ug/l	06-Dec-06 07:30	JMW
Lead, Dissolved	U	5.0	ug/l	07-Dec-06 08:13	JMW

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METALS ANALYSES
QUALITY CONTROL DOCUMENTATION

PDC Laboratories Quality Control Summary Report

PROJECT: 06113968

METALS ANALYSIS (SW6020) AND PREPARATION (SW3051)
QC CROSS REFERENCE REPORT

Lab ID	Client ID	Prep. Lot	Analysis Lot	Analysis Date	Analyst	Method	Sample Tag
06113968-1	TL-3	WG133278	WG133371	06-Dec-06 07:30	JMW	SW-846 6020	D10:1
06113968-1	TL-3		WG133481	07-Dec-06 08:13	JMW	SW-846 6020	D10:1

METHOD BLANK

Laboratory ID: WG133278-1 Analysis Lot: WG133371 Prep Batch: WG133278 Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead	UG/L	0.33J	1.0	06-Dec-06 06:55

Laboratory ID: WG133481-3 Analysis Lot: WG133481 Prep Batch: N/A Sample Tag: D10:1

Analyte	Units	Value	RDL	Analysis Date
Lead, Dissolved	UG/L	1.0U	1.0	07-Dec-06 07:39

LABORATORY CONTROL SAMPLE

Laboratory ID: WG133278-2 Analysis Lot: WG133371 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	556	560	101	80.0-120	06-Dec-06 07:04

Laboratory ID: WG133481-4 Analysis Lot: WG133481 Sample Tag: D10:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, Dissolved	UG/L	500	500	100	80.0-120	07-Dec-06 07:42

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Laboratory IDs: WG133481-5, WG133481-6 Analysis Lot: WG133481 Sample Spiked: 06113968-1 Site: TL-3 Sample Tag: D10:1

Analyte	Units	Amt MS Spiked	Amt MSD Spiked	Sample Value	MS Value	MSD Value	MS % Rec	MSD % Rec	Rec Limits	RPD	RPD Limits
Lead, Dissolved	UG/L	500	500	1.0U	480	490	96.0	98.0	75.0-125	2.06	20.0

INITIAL CALIBRATION VERIFICATION

Laboratory ID: WG133371-1 Analysis Lot: WG133371 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead	UG/L	25.0	26.	104	90.0-110	06-Dec-06 06:34

ENTACT®
environmental services

3129 Bass Pro Drive
Grapevine, Texas
76051

September 21, 2006

Mr. Jonathan Adenuga
U.S. EPA Region 5, DE-9J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

RE: Keystone Steel & Wire Company
7000 SW Adams Street, Peoria, Illinois

Dear Mr. Adenuga:

As requested and on behalf of the Keystone Consolidated Industries, Inc. d/b/a Keystone Steel & Wire Company ("Keystone"), ENTACT Services LLC ("ENTACT") is providing a copy of the laboratory report and the associated field measurements for the groundwater samples from monitoring wells NDSA-1, NDSA-2, W-2 and T-6A at the North Ditch Staging Area and monitoring wells FP-1, FP-2, and TL4-R at the F-Pond, each collected on May 8, 2006. Keystone did not submit these results to the U.S. EPA due to the fact that the newly-installed monitoring wells, NDSA-1, NDSA-2, FP-1, FP-2, and TL4-R, were inadvertently sampled prior to complete well development, as required by applicable regulations before groundwater sampling can be performed. This resulted in high concentrations of total and dissolved lead, as well as extremely high turbidity readings, in the groundwater from the suspended matter present in the water column due to well completion activities.

The sample results presented in the attached laboratory report are unrepresentative of the actual aquifer conditions at the time the monitoring wells were sampled. For this reason, ENTACT has determined that the May 8, 2006 sample results are not qualified to be used for compliance with respect to the RCRA Corrective Action groundwater requirements in the approved *Corrective Measures Implementation Workplan ("CMI Workplan")*. The appropriate procedures for monitoring well development prior to conducting monitoring well sampling were not performed as described in the *Field Sampling Plan* associated with the approved *CMI Workplan* or the U.S. EPA's guidance document titled "Environmental Investigations Standard Operating Procedures and Quality Assurance Manual". Therefore, ENTACT has stamped each page of the attached laboratory report to indicate that the results are unqualified and should not be used in evaluating actual groundwater conditions at the F-Pond and North Ditch Staging Area.

The newly-installed monitoring wells, NDSA-1, NDSA-2, FP-1, FP-2, and TL4-R, were properly developed and sampled along with monitoring wells W-2 and T-6A on July 13, 2006. The monitoring well development procedures, sampling procedures, field parameter results, and laboratory analytical results for the July 13, 2006 sampling event were submitted in a letter addendum to the U.S. EPA on September 8, 2006.

If you have any questions or comments regarding this letter, please feel free to contact me or Thad Slaughter at (972) 580-1323 or Chad Erdmann with Keystone at (309) 697-7165.

Respectfully,

Jenny Elste

Jenny Elste
ENTACT Services LLC

Enclosures

cc: Chad Erdmann, Keystone Steel & Wire Company
Jim Moore, IEPA

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Table 1
Summary of Total and Dissolved Lead Results in Ground Water
F-Pond and North Ditch Staging Area
Keystone Steel & Wire
Peoria, Illinois

Parameter	F-Pond			North Ditch Staging Area				
	FP-1 5/9/2006	FP-2 5/9/2006	TL-4 5/9/2006	NDSA-1 5/9/2006	NDSA-1 5/9/2006 (Dup-1)	NDSA-2 5/9/2006	T-6A 5/9/2006	W-2 5/9/2006
Lead, Total (μg/L)	580	850	110,000	20	24	1400	0.95 (U)	7.2
Lead, Dissolved (μg/L)	0.86 (U)	1.2 (B)	1,500	1.5 (B)	2.0 (B)	1.8 (B)	0.86 (U)	0.86 (U)
pH (s.u.)	7.25	7.37	12.62	6.97	--	7.29	6.95	6.96
Conductivity (mS/cm)	1.93	2.33	5.43	1.055	--	1.011	1.336	1.443
Tubidity (NTU)	331	5999	5999	422	--	2000	14.7	146
Temperature (°C)	14.25	13.32	14.99	18.71	--	15.63	14.92	13.70

Notes:

U - The result is less than the instrument detection limit (IDL).
B - The result is between the IDL and reporting limit (RL).
RL - Reporting limit = 5.0 μg/L

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

June 1, 2006

Mr. Andy Duwelius
Earth Tech
5010 Stone Mill Road
Bloomington, IN 47408

Dear Mr. Duwelius:

Enclosed is the quality control deliverables for the May 9, 2006 groundwater samples collected at Keystone Steel & Wire for Project 82781.02. If you have any questions, please call.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

EARTH TECH
BLOOMINGTON, IN

KEYSTONE STEEL & WIRE CO.
PROJECT 82781.02

SAMPLING EVENT:
MAY 9, 2006

REPORT DATE:
JUNE 1, 2006

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

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CASE NARRATIVE

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

To: Earth Tech

Facility: Keystone Steel & Wire Company, Project 82781.02

INORGANICS CASE NARRATIVE

Seven groundwater samples and one duplicate sample were received on May 10, 2006 for analysis in accordance with our Level II protocol. All samples were received in good condition with a sample temperature of 7°C. The samples were analyzed for Lead, Total and Dissolved (SW-846 Method 6010B).

The analyses were performed according to protocol and within the maximum allowable holding times. The samples were analyzed on May 22, 2006.

Matrix spike and matrix spike duplicate analyses were performed on sample FP-1.

The recoveries for accuracy and precision were within their required QC limits. Recoveries on the other quality control parameters (blanks, controls, verifications, etc.) were within the required QC limits.

Sincerely,

PDC LABORATORIES, INC.

Gail J. Schindler

Gail J. Schindler
Project Manager

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COVER PAGE

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Form 0

INORGANIC ANALYSIS COVER PAGE

Client Sample ID	Lab Sample ID	Date Collected	Final Date Analyzed
FP-1	06052317-1	09-May-06	22-May-06
TL-4	06052317-2	09-May-06	22-May-06
FP-2	06052317-3	09-May-06	22-May-06
NDSA-1	06052317-4	09-May-06	22-May-06
NDSA-2	06052317-5	09-May-06	22-May-06
T-6A	06052317-6	09-May-06	22-May-06
W-2	06052317-7	09-May-06	22-May-06
DUP-1	06052317-8	09-May-06	22-May-06

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CHAIN OF CUSTODY

PDC LABORATORIES, INC.
2231 WEST ALTORFER DRIVE
PEORIA, IL 61615

PHONE # 309-692-9688
FAX # 309-692-9689

CHAIN OF CUSTODY RECORD

State where samples collected _____

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT) - (SAMPLE ACCEPTANCE POLICY ON REVERSE)

1			
CLIENT: Earth Tech [Keystone]	PROJECT NUMBER: 82781.02	P.O. NUMBER:	MEANS SHIPPED:
ADDRESS: 5060 Stone Mill Rd	PHONE NUMBER: 812-336-0972	FAX NUMBER: 812-336-3991	DATE SHIPPED:
CITY STATE ZIP: Bloomington, IN 47408	SAMPLER (PLEASE PRINT): Rob Conway		MATRIX TYPES: WW-WASTEWATER, DW-DRINKING WATER, GW-GROUND WATER, WWSL-SLUDGE, NAS-SOLID, L'CHT-LEACHATE, OTHER:
CONTACT PERSON: R. Flores / J.A. Dawkins	SAMPLER'S SIGNATURE: Robert W. Conway		

3 ANALYSIS REQUESTED

4 (FOR LAB USE ONLY)
LOGIN # 36052317-8
LOGGED BY: MP
LAB PROJ. #
TEMPLATE:
PROJ. MGR.:

2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	BOTTLE COUNT	Total Lead 6010B	Dissolved Lead 6010B						REMARKS
FP-1	5-9-06	11:30	X		WTR	2	X	X						Limit = 15.0 ug/l
TL-4		12:10	X		WTR	2	X	X						
FP-2		12:55	X		WTR	2	X	X						
NDSA-1		14:20	X		WTR	2	X	X						
NDSA-2		16:00	X		WTR	2	X	X						
T-6A		16:55	X		WTR	2	X	X						
W-2		17:30	X		WTR	2	X	X						
Dup-1		13:00	X		WTR	2	X	X						

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE): NORMAL RUSH — DATE RESULTS NEEDED
RUSH RESULTS VIA (PLEASE CIRCLE): FAX PHONE
FAX # IF DIFFERENT FROM ABOVE: PHONE # IF DIFFERENT FROM ABOVE:

6 The sample temperature will be measured upon receipt at the lab. By initialing this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area you allow the lab to proceed with analytical testing regardless of the sample temperature. _____

7			
RELINQUISHED BY: (SIGNATURE) Robert W. Conway	DATE 5/9/06 TIME 1815	RECEIVED BY: (SIGNATURE) under COC Sealed/Released @ Treatment Plant	DATE TIME
RELINQUISHED BY: (SIGNATURE)	DATE TIME	RECEIVED BY: (SIGNATURE) Diana Blevins	DATE 5-10-06 TIME 10:10
RELINQUISHED BY: (SIGNATURE) Diana Blevins	DATE 5-10-06 TIME 11:30a	RECEIVED AT LAB BY: (SIGNATURE) [signature]	DATE 5/10/06 TIME 11:50a

8 COMMENTS: (FOR LAB USE ONLY)
SAMPLE TEMPERATURE UPON RECEIPT 7 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT Y OR N
SAMPLE(S) RECEIVED ON ICE Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) Y OR N
DATE AND TIME TAKEN FROM SAMPLE BOTTLE _____

00000004

Copies: white should accompany samples to PDC Labs. Yellow copy to be retained by the client.

PAGE ____ OF ____

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TABULATED ANALYTICAL RESULTS

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Report Cover Page

Earth Tech
5010 Stone Mill Road

Bloomington, IN 47408

Attn: Mr. Andy Duwelius

Date Received: 10-May-06
Date Reported: 01-Jun-06
PO #: WN26864
PDC Cust. # : 205746

Login No. 06052317

This report includes information regarding the following described samples as received by the laboratory and is only valid for the parameters tested. This report contains 8 results page(s) not including the cover page(s).

Sample No.	Client ID	Site	Locator
06052317-1	HWMU	FP-1	KEYSONE STEEL
06052317-2	HWMU	TL-4	KEYSONE STEEL
06052317-3	HWMU	FP-2	KEYSONE STEEL
06052317-4	HWMU	NDSA-1	KEYSONE STEEL
06052317-5	HWMU	NDSA-2	KEYSONE STEEL
06052317-6	HWMU	T-6A	KEYSONE STEEL
06052317-7	HWMU	W-2	KEYSONE STEEL
06052317-8	HWMU	DUP-1	KEYSONE STEEL

Certified by: Gail J. Schindler
Gail J. Schindler, Project Manager

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Drinking Water Certifications: Indiana (C-IL-04); Kansas (E-10338); Kentucky (90058); Missouri (00870); Wisconsin (998284430)
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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Laboratory Results

Earth Tech
5010 Stone Mill Road

Bloomington, IN 47408

Attn: Mr. Andy Duwelius

Date Received: 10-May-06
Date Reported: 01-Jun-06
PO #: WN26864
PDC Cust. # : 205746

Login No. 06052317

Sample No: 06052317-1
Client ID: HWMU
Site: FP-1
Locator: KEYSONE STEEL
Collect Date: 09-MAY-06 11:30

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				15-May-06 07:00	NJS
SW-846 METHOD 6010B					
Lead		580	ug/l	22-May-06 11:48	JVH
Lead, Dissolved	U	0.86	ug/l	22-May-06 10:31	JVH

U - The result is less than the IDL

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Laboratory Results

Earth Tech
5010 Stone Mill Road

Bloomington, IN 47408

Attn: Mr. Andy Duwelius

Date Received: 10-May-06
Date Reported: 01-Jun-06
PO #: WN26864
PDC Cust. # : 205746

Login No. 06052317

Sample No: 06052317-2
Client ID: HWMU
Site: TL-4
Locator: KEYSONE STEEL
Collect Date: 09-MAY-06 12:10

Parameter	Result	Units	Date	By
SW-846 METHOD 3015				
Sample Preparation			15-May-06 07:00	NJS
SW-846 METHOD 6010B				
Lead	110000	ug/l	22-May-06 12:02	JVH
Lead, Dissolved	1500	ug/l	22-May-06 10:52	JVH

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Laboratory Results

Earth Tech
5010 Stone Mill Road

Bloomington, IN 47408

Attn: Mr. Andy Duwelius

Date Received: 10-May-06
Date Reported: 01-Jun-06
PO #: WN26864
PDC Cust. # : 205746

Login No. 06052317

Sample No: 06052317-3
Client ID: HWMU
Site: FP-2
Locator: KEYSONE STEEL
Collect Date: 09-MAY-06 12:55

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				15-May-06 07:00	NJS
SW-846 METHOD 6010B					
Lead		850	ug/l	22-May-06 12:11	JVH
Lead, Dissolved	B	1.2	ug/l	22-May-06 10:55	JVH

B - The result is between the IDL and RL

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Laboratory Results

Earth Tech
5010 Stone Mill Road

Bloomington, IN 47408

Attn: Mr. Andy Duwelius

Date Received: 10-May-06
Date Reported: 01-Jun-06
PO #: WN26864
PDC Cust. # : 205746

Login No. 06052317

Sample No: 06052317-4
Client ID: HWMU
Site: NDSA-1
Locator: KEYSONE STEEL
Collect Date: 09-MAY-06 14:20

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				15-May-06 07:00	NJS
SW-846 METHOD 6010B					
Lead		20.	ug/l	22-May-06 12:39	JVH
Lead, Dissolved	B	1.5	ug/l	22-May-06 10:59	JVH

B - The result is between the IDL and RL

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P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Laboratory Results

Earth Tech
5010 Stone Mill Road

Bloomington, IN 47408

Attn: Mr. Andy Duwelius

Date Received: 10-May-06
Date Reported: 01-Jun-06
PO #: WN26864
PDC Cust. # : 205746

Login No. 06052317

Sample No: 06052317-5
Client ID: HWMU
Site: NDSA-2
Locator: KEYSONE STEEL
Collect Date: 09-MAY-06 16:00

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				15-May-06 07:00	NJS
SW-846 METHOD 6010B					
Lead		1400	ug/l	22-May-06 12:44	JVH
Lead, Dissolved	B	1.8	ug/l	22-May-06 11:03	JVH

B - The result is between the IDL and RL

00000010

recycled paper

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Laboratory Results

Earth Tech
5010 Stone Mill Road

Bloomington, IN 47408

Attn: Mr. Andy Duwelius

Date Received: 10-May-06
Date Reported: 01-Jun-06
PO #: WN26864
PDC Cust. # : 205746

Login No. 06052317

Sample No: 06052317-6
Client ID: HWMU
Site: T-6A
Locator: KEYSONE STEEL
Collect Date: 09-MAY-06 16:55

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				15-May-06 07:00	NJS
SW-846 METHOD 6010B					
Lead	U	0.95	ug/l	22-May-06 12:51	JVH
Lead, Dissolved	U	0.86	ug/l	22-May-06 11:06	JVH

U - The result is less than the IDL

recycled paper

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Laboratory Results

Earth Tech
5010 Stone Mill Road

Bloomington, IN 47408

Attn: Mr. Andy Duwelius

Date Received: 10-May-06
Date Reported: 01-Jun-06
PO #: WN26864
PDC Cust. # : 205746

Login No. 06052317

Sample No: 06052317-7
Client ID: HWMU
Site: W-2
Locator: KEYSONE STEEL
Collect Date: 09-MAY-06 17:30

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				15-May-06 07:00	NJS
SW-846 METHOD 6010B					
Lead		7.2	ug/l	22-May-06 13:00	JVH
Lead, Dissolved	U	0.86	ug/l	22-May-06 11:19	JVH

U - The result is less than the IDL

00000012

recycled paper

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UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Laboratory Results

Earth Tech
5010 Stone Mill Road

Bloomington, IN 47408

Attn: Mr. Andy Duwelius

Date Received: 10-May-06
Date Reported: 01-Jun-06
PO #: WN26864
PDC Cust. # : 205746

Login No. 06052317

Sample No: 06052317-8
Client ID: HWMU
Site: DUP-1
Locator: KEYSONE STEEL
Collect Date: 09-MAY-06 13:00

Parameter		Result	Units	Date	By
SW-846 METHOD 3015					
Sample Preparation				15-May-06 07:00	NJS
SW-846 METHOD 6010B					
Lead		24.	ug/l	22-May-06 13:06	JVH
Lead, Dissolved	B	2.0	ug/l	22-May-06 11:23	JVH

B - The result is between the IDL and RL

00000013

recycled paper

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

TOTAL METALS
QUALITY CONTROL DOCUMENTATION

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

SDG: 06052317

Lab Sample ID: 06052317-1 **Client ID:** FP-1

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.95	5.6	577		1.11	ICPST	5/22/2006	11:48

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results **UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES** **RDG:** 06052317

Lab Sample ID: 06052317-2 **Client ID:** TL-4

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	4.8	27.8	107000		5.55	ICPST	5/22/2006	12:02

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

E Serial dilution percent difference not within limits

Form I Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES RDG: 06052317

Lab Sample ID: 06052317-3 **Client ID:** FP-2

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	4.8	27.8	847		5.55	ICPST	5/22/2006	12:11

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results **UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES** **RDG:** 06052317

Lab Sample ID: 06052317-4 **Client ID:** NDSA-1

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.95	5.6	20.0		1.11	ICPST	5/22/2006	12:39

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES RDG: 06052317

Lab Sample ID: 06052317-5 **Client ID:** NDSA-2

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	4.8	27.8	1420		5.55	ICPST	5/22/2006	12:44

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

RDG: 06052317

Lab Sample ID: 06052317-6 **Client ID:** T-6A

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.95	5.6	0.95	U	1.11	ICPST	5/22/2006	12:51

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

RDG: 06052317

Lab Sample ID: 06052317-7 **Client ID:** W-2

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.95	5.6	7.2		1.11	ICPST	5/22/2006	13:00

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results **UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES** **RDG:** 06052317

Lab Sample ID: 06052317-8 **Client ID:** DUP-1

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.95	5.6	24.1		1.11	ICPST	5/22/2006	13:06

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Initial Calibration Verification Standar **SDG:** 06052317

Instrument: ICPST **Units:** ug/L

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Chart Number: 52206T.ARC **Acceptable Range:** 90% - 110%

Standard Source: Inorganic Ventures **Standard ID:** TS8-26C

Element	WL/ Mass	True Conc	ICV 5/22/2006 9:33 AM Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec
Lead	220.353	4000.0	4027.06	**100.7**								

PDC Laboratories, Inc.

Metals Data Reporting Form

Continuing Calibration Verification **SDG:** 06052317

Instrument: ICPST **Units:** ug/l

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Chart Number: 52206T.ARC **Acceptable Range:** 90% - 110%

Standard Source: Inorganic Ventures **Standard ID:** TS8-26C

Element	WL/ Mass	True Conc	CCV 5/22/2006 10:14 AM		CCV 5/22/2006 11:10 AM		CCV 5/22/2006 12:15 PM		CCV 5/22/2006 1:33 PM			
			Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec
Lead	220.353	4000.0	4066.57	**101.7**	4025.12	**100.6**	4048.41	**101.2**	4069.97	**101.7**		

PDC Laboratories, Inc.

Metals Data Reporting Form

Initial Calibration Blank Results

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

SDG: 06052317

Instrument: ICPST

Units: ug/L

Chart Number: 52206T.ARC

Standard Source: NA

Standard ID: NA

Element	WL/ Mass	Report Limit	ICB 5/22/2006 9:41 AM Found	Q	Found	Q	Found	Q	Found	Q	Found	Q
Lead	220.353	5	-0.9	B								

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

Form 3 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Continuing Calibration Blank Result

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

SDG: 06052317

Instrument: ICPST **Units:** ug/L

Chart Number: 52206T.ARC

Standard Source: NA **Standard ID:** NA

Element	WL/ Mass	Report Limit	CCB 5/22/2006 10:18 AM		CCB 5/22/2006 11:14 AM		CCB 5/22/2006 12:23 PM		CCB 5/22/2006 1:37 PM			
			Found	Q	Found	Q	Found	Q	Found	Q	Found	Q
Lead	220.353	5	**1.0**	**B**	0.9	U	0.9	U	0.9	U		

U Result is less than the IDL

B Result is between IDL and RL

PDC Laboratories, Inc.

Metals Data Reporting Form

Preparation Blank Results

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

SDG: 06052317

Lab Sample ID: MB-05/15-1

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.353	0.95	5.6	0.95	U	1.11	ICPST	5/22/2006	11:30

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

Form 3 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Interference Check Standard A **SDG:** 06052317

Instrument: ICPST **Units:** ug/l

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Chart Number: 52206T.ARC **Acceptable Range:** 0% - 0%

Standard Source: Solutions Plus **Standard ID:** TS8-18B

Element	WL/ Mass	Reporting Limit	True Conc	ICSA 5/22/2006 9:54 AM				
				Found	Found	Found	Found	Found
Lead	220.353	5		2				

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

Form 4 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Interference Check Standard AB **SDG:** 06052317

Instrument: ICPST **Units:** ug/L

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Chart Number: 52206T.ARC **Acceptable Range:** 80% - 120%

Standard Source: Solutions Plus **Standard ID:** TS8-25C

Element	WL/ Mass	True Conc	ICSAB 5/22/2006 10:09 AM Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec
Lead	220.353	50	52.5	**105.1**								

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
N Spike recovery failed

Form 4 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Matrix Spike Sample Results **SDG:** 06052317

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Spike Sample ID: 06052317-1MS

Original Sample ID: 06052317-1 **Client ID:** FP-1 S

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	OS Conc	Q	MS Conc	Q	Spike Level	% Rec	OS DF	MS DF	Instr	OS Anal Date	OS Anal Time	MS Anal Date	MS Anal Time
Lead	220.4	577		1110		555	96.8	1.11	1.11	ICPST	5/22/2006	11:48	5/22/2006	11:51

Comments:

U Result is less than the IDL
B Result is between IDL and RL
N Spike recovery failed
NC Percent recovery was not calculated
* Duplicate analysis RPD was not within limits

Form 5A Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Matrix Spike Duplicate Sample Results **SDG:** 06052317

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Spike Sample ID: 06052317-1MSD

Original Sample ID: 06052317-1 **Client ID:** FP-1 D

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	OS Conc	Q	MSD Conc	Q	Spike Level	% Rec	OS DF	MSD DF	Instr	OS Anal Date	OS Anal Time	MSD Anal Date	MSD Anal Time
Lead	220.4	577		1100		555	94.3	1.11	1.11	ICPST	5/22/2006	11:48	5/22/2006	11:55

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
N Spike recovery failed
NC Percent recovery was not calculated
* Duplicate analysis RPD was not within limits

Form 5A Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Matrix Spike Duplicate RPD Report **SDG:** 06052317

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Matrix Spike Duplicate Sample ID: 06052317-1MSD

Matrix Spike Sample ID: 06052317-1MS **Client ID:** FP-1 D

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MS Conc	Q	MSD Conc	Q	% RPD	MS DF	MSD DF	Instr	MS Anal Date	MS Anal Time	MSD Anal Date	MSD Anal Time
Lead	220.353	1110		1100		2.7	1.11	1.11	ICPST	5/22/2006	11:51	5/22/2006	11:55

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
N Spike recovery failed
NC Percent recovery was not calculated
* Duplicate analysis RPD was not within limits

Form 6 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Laboratory Control Sample Results

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

SDG: 06052317

Lab Sample ID: LCS-05/15-1

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	Spike Level	Conc	Percent Recovery	Q	Range	DF	Instr	Anal Date	Anal Time
Lead	220.353	555	587	105.7		80-120	1.11	ICPST	5/22/2006	11:34

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

Form 7 Equivalent

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

DISSOLVED METALS
QUALITY CONTROL DOCUMENTATION

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results **UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES** **SDG:** 06052317

Lab Sample ID: 06052317-1 **Client ID:** FP-1

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.86	5.0	0.86	U	1	ICPST	5/22/2006	10:31

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results **UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES** **SDG:** 06052317

Lab Sample ID: 06052317-2 **Client ID:** TL-4

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.86	5.0	1490		1	ICPST	5/22/2006	10:52

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results **UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES** **RDG:** 06052317

Lab Sample ID: 06052317-3 **Client ID:** FP-2

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.86	5.0	1.2	B	1	ICPST	5/22/2006	10:55

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results **UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES** **RDG:** 06052317

Lab Sample ID: 06052317-4 **Client ID:** NDSA-1

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.86	5.0	1.5	B	1	ICPST	5/22/2006	10:59

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

RDG: 06052317

Lab Sample ID: 06052317-5 **Client ID:** NDSA-2

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.86	5.0	1.8	B	1	ICPST	5/22/2006	11:03

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results **UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES** **RDG:** 06052317

Lab Sample ID: 06052317-6 **Client ID:** T-6A

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.86	5.0	0.86	U	1	ICPST	5/22/2006	11:06

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results **UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES** **RDG:** 06052317

Lab Sample ID: 06052317-7 **Client ID:** W-2

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.86	5.0	0.86	U	1	ICPST	5/22/2006	11:19

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Sample Results **UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES** **RDG:** 06052317

Lab Sample ID: 06052317-8 **Client ID:** DUP-1

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.35	0.86	5.0	2.0	B	1	ICPST	5/22/2006	11:23

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

E Serial dilution percent difference not within limits

Form 1 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Initial Calibration Verification Standar **SDG:** 06052317

Instrument: ICPST **Units:** ug/L

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Chart Number: 052206S.ARC **Acceptable Range:** 90% - 110%

Standard Source: Inorganic Ventures **Standard ID:** TS8-26C

Element	WL/ Mass	True Conc	ICV 5/22/2006 9:33 AM Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec
Lead	220.353	4000.0	4027.06	**100.7**								

PDC Laboratories, Inc.

Metals Data Reporting Form

Continuing Calibration Verification **SDG:** 06052317

Instrument: ICPST **Units:** ug/L

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Chart Number: 052206S.ARC **Acceptable Range:** 90% - 110%

Standard Source: Inorganic Ventures **Standard ID:** TS8-26C

Element	WL/ Mass	True Conc	CCV 5/22/2006 10:14 AM		CCV 5/22/2006 11:10 AM		CCV 5/22/2006 12:15 PM					
			Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec
Lead	220.353	4000.0	4066.57	**101.7**	4025.12	**100.6**	4048.41	**101.2**				

PDC Laboratories, Inc.

Metals Data Reporting Form

Initial Calibration Blank Results

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

SDG: 06052317

Instrument: ICPST

Units: ug/L

Chart Number: 052206S.ARC

Standard Source: NA

Standard ID: NA

Element	WL/ Mass	Report Limit	ICB 5/22/2006 9:41 AM Found	Q	Found	Q	Found	Q	Found	Q	Found	Q
Lead	220.353	5	-0.9	B								

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

Form 3 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Continuing Calibration Blank Result

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

SDG: 06052317

Instrument: ICPST **Units:** ug/L

Chart Number: 052206S.ARC

Standard Source: NA **Standard ID:** NA

Element	WL/ Mass	Report Limit	CCB 5/22/2006 10:18 AM		CCB 5/22/2006 11:14 AM		CCB 5/22/2006 12:23 PM					
			Found	Q	Found	Q	Found	Q	Found	Q	Found	Q
Lead	220.353	5	**1.0**	**B**	0.9	U	0.9	U				

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

Form 3 Equivalent

00000044

PDC Laboratories, Inc.

Metals Data Reporting Form

Preparation Blank Results

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

SDG: 06052317

Lab Sample ID: MB-05/22-1

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MDL	Report Limit	Conc	Q	DF	Instr	Anal Date	Anal Time
Lead	220.353	0.86	5.0	0.86	U	1	ICPST	5/22/2006	10:23

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

Form 3 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Interference Check Standard A **SDG:** 06052317

Instrument: ICPST **Units:** ug/L

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Chart Number: 052206S.ARC **Acceptable Range:** 0% - 0%

Standard Source: Solutions Plus **Standard ID:** TS8-18B

Element	WL/ Mass	Reporting Limit	True Conc	ICSA 5/22/2006 9:54 AM Found	ICSA 5/22/2006 10:08 AM Found	Found	Found	Found
Lead	220.353	5		2	2			

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

Form 4 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Interference Check Standard AB **SDG:** 06052317

Instrument: ICPST **Units:** ug/L

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Chart Number: 052206S.ARC **Acceptable Range:** 80% - 120%

Standard Source: Solutions Plus **Standard ID:** TS8-25C

Element	WL/ Mass	True Conc	ICSAB 5/22/2006 10:09 AM Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec	Found	% Rec
Lead	220.353	50	52.5	**105.1**								

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
N Spike recovery failed

Form 4 Equivalent

00000047

PDC Laboratories, Inc.

Metals Data Reporting Form

Matrix Spike Sample Results

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

SDG: 06052317

Spike Sample ID: 06052317-1MS

Original Sample ID: 06052317-1 **Client ID:** FP-1 S

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	OS Conc	Q	MS Conc	Q	Spike Level	% Rec	OS DF	MS DF	Instr	OS Anal Date	OS Anal Time	MS Anal Date	MS Anal Time
Lead	220.4	0.86	U	461		500	92.1	1	1	ICPST	5/22/2006	10:31	5/22/2006	10:34

Comments:

U Result is less than the IDL
B Result is between IDL and RL
N Spike recovery failed
NC Percent recovery was not calculated
* Duplicate analysis RPD was not within limits

Form 5A Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Matrix Spike Duplicate Sample Results **SDG:** 06052317

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Spike Sample ID: 06052317-1MSD

Original Sample ID: 06052317-1 **Client ID:** FP-1 D

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	OS Conc	Q	MSD Conc	Q	Spike Level	% Rec	OS DF	MSD DF	Instr	OS Anal Date	OS Anal Time	MSD Anal Date	MSD Anal Time
Lead	220.4	0.86	U	459		500	91.9	1	1	ICPST	5/22/2006	10:31	5/22/2006	10:37

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
N Spike recovery failed
NC Percent recovery was not calculated
* Duplicate analysis RPD was not within limits

Form 5A Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Matrix Spike Duplicate RPD Report **SDG:** 06052317

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

Matrix Spike Duplicate Sample ID: 06052317-1MSD

Matrix Spike Sample ID: 06052317-1MS **Client ID:** FP-1 D

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	MS Conc	Q	MSD Conc	Q	% RPD	MS DF	MSD DF	Instr	MS Anal Date	MS Anal Time	MSD Anal Date	MSD Anal Time
Lead	220.353	461		459		0.2	1	1	ICPST	5/22/2006	10:34	5/22/2006	10:37

Comments:

5.04.0

U Result is less than the IDL
B Result is between IDL and RL
N Spike recovery failed
NC Percent recovery was not calculated
* Duplicate analysis RPD was not within limits

Form 6 Equivalent

PDC Laboratories, Inc.

Metals Data Reporting Form

Laboratory Control Sample Results

UNQUALIFIED DATA DUE TO ERROR IN FIELD PROCEDURES

SDG: 06052317

Lab Sample ID: LCS-05/22-1

Matrix: Water **Units:** ug/L **Prep Date:** 5/15/2006 **Prep Batch:** 02M

Weight: NA **Volume:** 50 **Percent Moisture:** NA

Element	WL/ Mass	Spike Level	Conc	Percent Recovery	Q	Range	DF	Instr	Anal Date	Anal Time
Lead	220.353	500	531	106.1		80-120	1	ICPST	5/22/2006	10:26

Comments:

5.04.0

U Result is less than the IDL

B Result is between IDL and RL

Form 7 Equivalent