

December 22, 2011



Mr. Kevin Pylka
PolyMet Mining, Inc.
P.O. Box 475
Hoyt Lakes, Minnesota 55790

RE: Test pit results and waste removal summary for the Cliffs Biwabik Ore Corporation Property located near Biwabik, Minnesota

Dear Mr. Pylka:

Per the authorization of PolyMet Mining, Inc. (PolyMet) we have completed our services for this project. This report summarizes our methodologies and the results of our field observations and laboratory data.

Background

The Property consists of approximately 5,395 acres. A Phase I Environmental Site Assessment was conducted for this Property and one recognized environmental condition (REC) was observed. The REC was that unauthorized dumping had occurred at various locations across the site. Materials observed in the waste piles included general demolition debris, one old milk truck, metal debris, household garbage, furniture, and animal carcasses. A total of 24 unauthorized dump locations were observed. The Property location is shown on Figure 1 and the unauthorized dump locations are shown on Figure 2.

Procedures and Results

Between July 13 and July 15, 2011 Kangas Excavating (Kangas) was hired to remove the waste piles from the Property. Kangas employees have received Solid Waste Operator Certification from the Minnesota Pollution Control Agency and have a contract with the St. Louis County Environmental Services Department to manage the St. Louis County Mixed Municipal Waste (MSW) Landfill. As part of this Contract, Kangas is responsible for accepting and managing waste at the landfill.

Kangas was asked to segregate the various waste piles and determine what wastes could be accepted at the landfill. Northeast Technical Services, Inc. (NTS) was on-site to inspect the waste and determine if any regulated substances may have spilled that would require any follow-up sampling. The NTS representative on-site also was a Minnesota Department of Health (MDH) Certified Asbestos Inspector. As an asbestos inspector the NTS visually examined the waste and determined if any of the material had the potential to contain asbestos. There were no potential asbestos containing materials observed. Kangas collected all of the waste at the identified unauthorized dump locations and disposed of it in the St. Louis County landfill. Once the dumped materials had been removed Kangas constructed sand berms at the end of each of the access roads to restrict access to these areas.



Of the 24 unauthorized dump locations only two had the potential to release a regulated substance. One is identified as a 1950's Milk Truck and is listed as Reference Point Z on Figure 2, and the second was a mix of twelve 1-quart and 1-gallon containers of used oil located near Reference Point Y on Figure 2.

At the Milk Truck one petroleum stain less than 2-feet in diameter was observed. NTS hand excavated approximately 5-gallons of soil and collected a sample from the base of the excavation. The hand excavation was approximately 2-feet in diameter and extended to a depth of two feet. Excavation was discontinued when no visible staining was left. A sample was collected at the base of the excavation (MT-1) and was analyzed for diesel range organics (DRO) and benzene, toluene, ethylbenzene, and total xylenes (BTEX). There were no detections of the BTEX compounds above the laboratory reporting limits, and there was a DRO detection of 990 parts per million (ppm). A stockpile sample was also collected of the material that was excavated and hauled to the landfill for disposal (MTSP-1). The stockpile sample had no detections of the BTEX compounds above the laboratory reporting limit and a detection of DRO at 2,900 ppm.

Due to the detections at the base of the excavation, NTS returned to the site on September 10, 2011 and excavated another 5-gallons of soil. A sample was collected from the base of the excavation and was analyzed for DRO, gasoline range organics (GRO), BTEX, and DRO using a silica gel clean-up. The silica gel cleanup is intended to remove biogenic interferences to the DRO test. The results of the tests were 61 ppm of DRO and 36 ppm of DRO after the silica gel cleanup. There were no GRO or BTEX detections above the laboratory reporting limits. A copy of the laboratory reports is attached to this letter.

At the Oil container disposal area it was observed that only two of the containers had leaked and the containers were adjacent to each other. The stain from these two leaky containers was approximately 1 1/2-feet in diameter. NTS hand excavated approximately 5-gallons of soil and collected a sample from the base of the excavation. The hand excavation was approximately 1 1/2-feet in diameter and extended to a depth of two feet. Excavation was discontinued when no visible staining was left. A sample was collected at the base of the excavation (OS-1) and was analyzed for diesel range organics (DRO) and benzene, toluene, ethylbenzene, and total xylenes (BTEX). There were no detections of the BTEX compounds above the laboratory reporting limits, and there was a DRO detection of 420 parts per million (ppm). A stockpile sample was also collected of the material that was excavated and hauled to the landfill for disposal (OSSP-1). The stockpile sample had no detections of the BTEX compounds above the laboratory reporting limit and a detection of DRO at 4,000 ppm.

Due to the detections at the base of the excavation, NTS returned to the site on September 10, 2011 and excavated another 5-gallons of soil. A sample was collected from the base of the excavation and was analyzed for DRO. The DRO sample result was 14 ppm. A copy of the laboratory reports is attached to this letter.



Closure

Based on the field and laboratory results it is our opinion that:

1. There were no releases of regulated substances observed at 22 of the 24 identified unauthorized dump locations.
2. Material dumped at all 24 unauthorized dump areas has been removed and properly disposed in the St. Louis County landfill;
3. A release of less than 5-gallons of used oil occurred in the area of the former Milk Truck. The most significant portion of this release, including all of the stained soil, has been removed and disposed of in the St. Louis County Landfill. Due to the low volume of material and the low DRO concentrations the remaining material should degrade in-situ; and,
4. A release of less than 5-gallons of used oil occurred in the area of the oil container disposal area. The most significant portion of this release, including all of the stained soil, has been removed and disposed of in the St. Louis County Landfill. Due to the low volume of material and the low DRO concentrations this material should degrade in-situ

If you have any questions please feel free to contact me at (218) 742-1029.

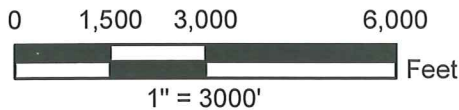
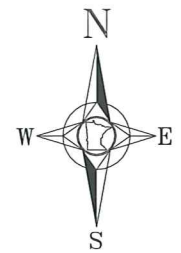
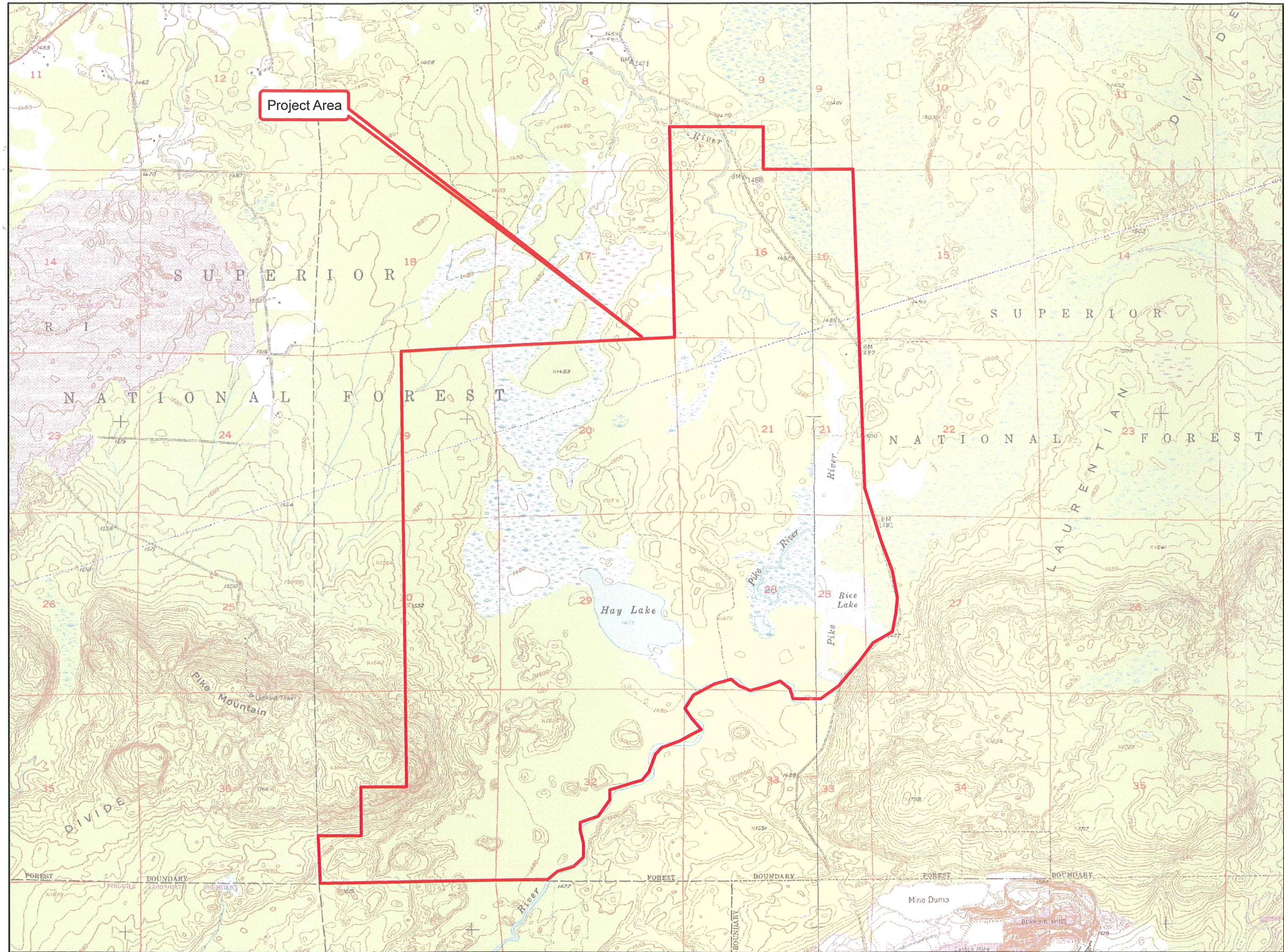
Sincerely,
Northeast Technical Services, Inc

A handwritten signature in blue ink, appearing to read 'Douglas A. Fossell', is written over a large, stylized blue circular mark.

Douglas A. Fossell
Senior Project Manager

Enclosures:

Figure 1: Site Location Map
Figure 2: Site Vicinity Map
Laboratory Report

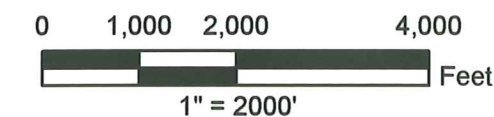


LEGEND

 Approximate Project Area

NOTES:
7.5 Minute United States Geological Service
Topographic Map courtesy of MN DNR Data Deli
The property boundary depicted is approximate.

Reference Point	Materials
A	View of Pike River
B	ATV Bridge
C	Shingles
D	Bottles, paint cans, wood, boxes, couch
E	Building material, flooring, wood
F	Stereo, building material, box spring
G	Household garbage, food containers
H	Plastic sheeting
I	Chairs, tires
J	Wood scrap
K	Tire
L	Burn pile
M	Net, snowmobile helmet, sled
N	Wood, plastic containers, glass
O	Kitchen drainer, rubber hose, metal
P	Rusted metal parts, box springs, car hood
Q	Shingles, box springs, cans
R	Wood, metal spring
S	Concrete block, wood, bricks
T	Tires
U	Household garbage, bed frame
V	Wood debris, door frame
W	Wood, tires, closet door
X	Metal culvert
Y	Snare drum, vacuum, wood trim
Z	F-350 Ford - 1950s Milk Truck



LEGEND

- Reference Points
- Kayak Route
- Trails
- Approximate Project Area

NOTES:

2008 NAIP Digital Aerial Photograph
Courtesy of MN Geospatial Information Office

The property boundary depicted is approximate.

Drawing File Path:
P:\08 Projects\Hoyt Lakes\
PolyMet\7158J\dwg\ReferencePts.mxd

Drawn By: SMJ
Date: NOV 2009

Reviewed By: DAF
Date: NOV 2009

Project #: 7158J.08 Phase I ESA
Hay Lake- PolyMet Mining, Inc.
Biwabik, St. Louis County, Minnesota



NTS, Inc.
526 Chestnut Street
P.O. Box 1142
Virginia, MN 55792

Figure 2
Site Detail Map
Reference Points

2

Wednesday, July 27, 2011



NTS
Attn: Doug Fossell
526 Chestnut Street
Virginia, MN 55792

RE: Pace COC#117013

Dear Doug Fossell,

Enclosed are the analytical results for sample(s) received by the laboratory on July 13, 2011. The results relate only to the samples included in this report. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Dan Toms". The signature is written in a cursive, flowing style.

Dan Toms
Project Manager



SAMPLE SUMMARY



Pace Analytical Services

315 Chestnut Street
PO Box 1212
Virginia, MN 55792
Phone: 218-742-1042
Fax: 218-742-1010

PAGE COC: 117013

Client: - NTS

Project: VM7158JA - Hay Lake Dump Cleanup

Sampled By: M. Lucas

Report Date: 7/27/2011

Laboratory Results

Virginia MDH Certification: 027-137-445

Duluth MDH Certification: 027-137-446

Sample Description	Sample ID	Sample Type	Matrix	Sample Date	Received Date
MT-1	496361	Grab	Non-Aqueous	7/13/2011 10:55	7/13/2011 12:45
MTSP-1	496362	Grab	Non-Aqueous	7/13/2011 10:55	7/13/2011 12:45
OS-1	496363	Grab	Non-Aqueous	7/13/2011 11:56	7/13/2011 12:45
OSSP-1	496364	Grab	Non-Aqueous	7/13/2011 11:56	7/13/2011 12:45

SAMPLE RESULTS

PACE Sample: 496361
Description: MT-1
Sample Date: 7/13/2011 10:55:00 AM

Matrix: Non-Aqueous
Sample Type: Grab

PACE COC: 117013
Client: - NTS
Project: VM7158JA - Hay Lake Dump Cleanup
Sampled By: M. Lucas
Report Date: 7/27/2011
Rec'd Temperature: 3.4 °C

Analyte	Result	RL	Units	Method	Prepared Date	Analysis Date	
Benzene	<100	100	µg/Kg	EPA 8021	7/19/2011	7/19/2011 13:43	q
Ethyl Benzene	<71	71	µg/Kg	EPA 8021	7/19/2011	7/19/2011 13:43	q
Toluene	<100	100	µg/Kg	EPA 8021	7/19/2011	7/19/2011 13:43	q
Xylene, Total	<200	200	µg/Kg	EPA 8021	7/19/2011	7/19/2011 13:43	q
DRO	990	180	mg/Kg	WI(95) DRO	7/14/2011	7/14/2011 21:26	D,q

Qualifier	Description	Note
D	Heavy hydrocarbon compounds detected beyond the DRO window.	
q	Qualified Data.	Sample results are based on wet weight.

SAMPLE RESULTS

PACE Sample: 496362

Description: MTSP-1

Sample Date: 7/13/2011 10:55:00 AM

Matrix: Non-Aqueous

Sample Type: Grab

PACE COC: 117013

Client: - NTS

Project: VM7158JA - Hay Lake Dump Cleanup

Sampled By: M. Lucas

Report Date: 7/27/2011

Rec'd Temperature: 3.4 °C

Analyte	Result	RL	Units	Method	Prepared Date	Analysis Date	
Benzene	<100	100	µg/Kg	EPA 8021	7/19/2011	7/19/2011 15:48	q
Ethyl Benzene	<71	71	µg/Kg	EPA 8021	7/19/2011	7/19/2011 15:48	q
Toluene	<100	100	µg/Kg	EPA 8021	7/19/2011	7/19/2011 15:48	q
Xylene, Total	<200	200	µg/Kg	EPA 8021	7/19/2011	7/19/2011 15:48	q
DRO	2900	430	mg/Kg	WI(95) DRO	7/14/2011	7/14/2011 21:54	D,q

Qualifier	Description	Note
D	Heavy hydrocarbon compounds detected beyond the DRO window.	
q	Qualified Data.	Sample results are based on wet weight.

SAMPLE RESULTS

PACE Sample: 496363

Description: OS-1

Sample Date: 7/13/2011 11:56:00 AM

Matrix: Non-Aqueous

Sample Type: Grab

PACE COC: 117013

Client: - NTS

Project: VM7158JA - Hay Lake Dump Cleanup

Sampled By: M. Lucas

Report Date: 7/27/2011

Rec'd Temperature: 3.4 °C

Analyte	Result	RL	Units	Method	Prepared Date	Analysis Date	
Benzene	<100	100	µg/Kg	EPA 8021	7/19/2011	7/19/2011 16:19	q
Ethyl Benzene	<71	71	µg/Kg	EPA 8021	7/19/2011	7/19/2011 16:19	q
Toluene	<100	100	µg/Kg	EPA 8021	7/19/2011	7/19/2011 16:19	q
Xylene, Total	<200	200	µg/Kg	EPA 8021	7/19/2011	7/19/2011 16:19	q
DRO	420	76	mg/Kg	WI(95) DRO	7/14/2011	7/15/2011 12:10	D,q

Qualifier Description

D Heavy hydrocarbon compounds detected beyond the DRO window.

q Qualified Data.

Note

Sample results are based on wet weight.

SAMPLE RESULTS

PACE Sample: 496364

Description: OSSP-1

Sample Date: 7/13/2011 11:56:00 AM

Matrix: Non-Aqueous

Sample Type: Grab

PACE COC: 117013

Client: - NTS

Project: VM7158JA - Hay Lake Dump Cleanup

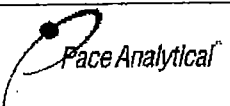
Sampled By: M. Lucas

Report Date: 7/27/2011

Rec'd Temperature: 3.4 °C

Analyte	Result	RL	Units	Method	Prepared Date	Analysis Date	
Benzene	<100	100	µg/Kg	EPA 8021	7/19/2011	7/19/2011 16:51	q
Ethyl Benzene	<71	71	µg/Kg	EPA 8021	7/19/2011	7/19/2011 16:51	q
Toluene	<100	100	µg/Kg	EPA 8021	7/19/2011	7/19/2011 16:51	q
Xylene, Total	<200	200	µg/Kg	EPA 8021	7/19/2011	7/19/2011 16:51	q
DRO	4000	400	mg/Kg	WI(95) DRO	7/14/2011	7/14/2011 22:49	D,q

Qualifier	Description	Note
D	Heavy hydrocarbon compounds detected beyond the DRO window.	
q	Qualified Data.	Sample results are based on wet weight.

	Document Name: Sample Condition Upon Receipt Form	Document Revision: 20 June 2011 Page 1 of 1
	Document No: F-VM-C-001 Rev. 01	Issuing Authority: Pace Virginia Minnesota Quality Office

Client Name: NTS Project # 117013

Courier: ☐ Fed Ex ☐ UPS ☐ USPS ☒ Client ☐ Commercial ☐ Pace Other _____

Tracking #: _____

Custody Seal on Cooler/Box Present: ☐ yes ☒ no Seals intact: ☐ yes ☐ no N/A

Packing Material: ☐ Bubble Wrap ☐ Bubble Bags ☒ None ☐ Other _____ Temp Blank: Yes ☒ No _____

Thermometer Used 101594812 Type of Ice: Wet Blue None ☐ Samples on ice, cooling process has begun

Cooler Temperature 3.84 Biological Tissue Is Frozen: Yes No N/A
Temp should be above freezing to 6°C 7-13-11 Comments: _____

Date and initials of person examining contents: 7-13-11 CO

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5.
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	6.
Rush Turn Around Time Requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	7.
Sufficient Volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	8.
Correct Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	9.
-Pace Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.
Filtered volume received for Dissolved tests	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	11.
Sample Labels match COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	12.
-Includes date/time/ID/Analysis Matrix: <u>SL</u>		
All containers needing acid/base preservation will be checked and documented in the pH logbook		13. See pH log for results and additional preservation documentation
Headspace in VOA Vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	15.
Trip Blank Custody Seals Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Pace Trip Blank Lot #:		

Client Notification/ Resolution:

Field Data Required? Y / N

Person Contacted: Doug F Date/Time: 7/17/11

Comments/ Resolution:

NO moisture samples taken with samples. Client would like to report on a wet weight basis
DIT

Project Manager Review:

Date: 7/14/11



Northeast Technical Services, Inc.
315 Chestnut Street
P.O. Box 1142
Virginia, Minnesota 55792
Phone: 218-741-4290
Fax: 218-742-1010

Duluth Laboratory
1510 W. Superior Street
Duluth, MN 55802
Phone: 218-348-3998
Fax: 218-336-2995

CO# 117013

Page _____ of _____
Date Due: _____

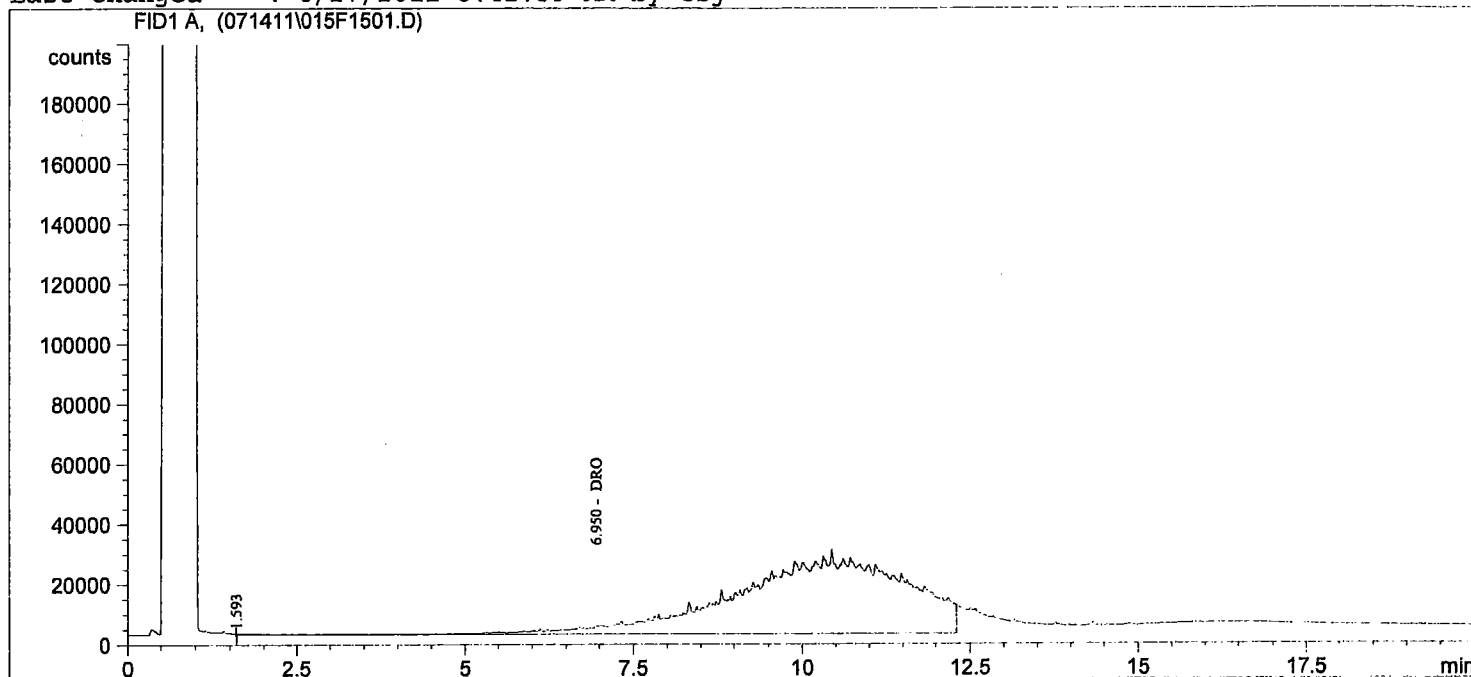
CHAIN OF CUSTODY RECORD

Client Information		Report to:								
Client: <u>175</u>	Address: <u>Dog Fosse</u>	<div style="border: 1px solid black; height: 100px; width: 100%;"></div>								
Contact Person: <u>Dog F.</u>	Address: <u>Dog Fosse</u>									
Address: <u>Dog F.</u>	Address: <u>Dog Fosse</u>									
Phone: _____	Invoice to: _____	<div style="border: 1px solid black; height: 100px; width: 100%;"></div>								
Fax: _____	Address: <u>Dog Fosse</u>									
Project Information: <u>HAZARDOUS WASTE CLEANUP</u>										
Lab Use Only		Analysis Required								
Laboratory ID	Sample Description	Collection	Matrix	Type	Filtered	Comments				
		Date	Time	Liquid	Solid	Other	Grab	Comp		
496361	MT-1	7-13	1055		X		X		1	1
496362	MT-1	7-13	1055		X		X		1	1
496363	MTSP-1	7-13	1055		X		X		1	1
496364	MTSP-1	7-13	1055		X		X		1	1
496365	OS-1	7-13	1156		X		X		1	1
496366	OS-1	7-13	1156		X		X		1	1
496367	OS-1	7-13	1156		X		X		1	1
496368	OS-1	7-13	1156		X		X		1	1
496369	OS-1	7-13	1156		X		X		1	1
496370	OS-1	7-13	1156		X		X		1	1
496371	OS-1	7-13	1156		X		X		1	1
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496373	OS-1	7-13	1156		X		X		1	1
496374	OS-1	7-13	1156		X		X		1	1
496375	OS-1	7-13	1156		X		X		1	1
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496377	OS-1	7-13	1156		X		X		1	1
496378	OS-1	7-13	1156		X		X		1	1
496379	OS-1	7-13	1156		X		X		1	1
496380	OS-1	7-13	1156		X		X		1	1
496381	OS-1	7-13	1156		X		X		1	1
496382	OS-1	7-13	1156		X		X		1	1
496383	OS-1	7-13	1156		X		X		1	1
496384	OS-1	7-13	1156		X		X		1	1
496385	OS-1	7-13	1156		X		X		1	1
496386	OS-1	7-13	1156		X		X		1	1
496387	OS-1	7-13	1156		X		X		1	1
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496389	OS-1	7-13	1156		X		X		1	1
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496393	OS-1	7-13	1156		X		X		1	1
496394	OS-1	7-13	1156		X		X		1	1
496395	OS-1	7-13	1156		X		X		1	1
496396	OS-1	7-13	1156		X		X		1	1
496397	OS-1	7-13	1156		X		X		1	1
496398	OS-1	7-13	1156		X		X		1	1
496399	OS-1	7-13	1156		X		X		1	1
496400	OS-1	7-13	1156		X		X		1	1
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496402	OS-1	7-13	1156		X		X		1	1
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496405	OS-1	7-13	1156		X		X		1	1
496406	OS-1	7-13	1156		X		X		1	1
496407	OS-1	7-13	1156		X		X		1	1
496408	OS-1	7-13	1156		X		X		1	1
496409	OS-1	7-13	1156		X		X		1	1
496410	OS-1	7-13	1156		X		X		1	1
496411	OS-1	7-13	1156		X		X		1	1
496412	OS-1	7-13	1156		X		X		1	1
496413	OS-1	7-13	1156		X		X		1	1
496414	OS-1	7-13	1156		X		X		1	1
496415	OS-1	7-13	1156		X		X		1	1
496416	OS-1	7-13	1156		X		X		1	1
496417	OS-1	7-13	1156		X		X		1	1
496418	OS-1	7-13	1156		X		X		1	1
496419	OS-1	7-13	1156		X		X		1	1
496420	OS-1	7-13	1156		X		X		1	1
496421	OS-1	7-13	1156		X		X		1	1
496422	OS-1	7-13	1156		X		X		1	1
496423	OS-1	7-13	1156		X		X		1	1
496424	OS-1	7-13	1156		X		X		1	1
496425	OS-1	7-13	1156		X		X		1	1
496426	OS-1	7-13	1156		X		X		1	1
496427	OS-1	7-13	1156		X		X		1	1
496428	OS-1	7-13	1156		X		X		1	1
496429	OS-1	7-13	1156		X		X		1	1
496430	OS-1	7-13	1156		X		X		1	1
496431	OS-1	7-13	1156		X		X		1	1
496432	OS-1	7-13	1156		X		X		1	1
496433	OS-1	7-13	1156		X		X		1	1
496434	OS-1	7-13	1156		X		X		1	1
496435	OS-1	7-13	1156		X		X		1	1
496436	OS-1	7-13	1156		X		X		1	1
496437	OS-1	7-13	1156		X		X		1	1
496438	OS-1	7-13	1156		X		X		1	1
496439	OS-1	7-13	1156		X		X		1	1
496440	OS-1	7-13	1156		X		X		1	1
496441	OS-1	7-13	1156		X		X		1	1
496442	OS-1	7-13	1156		X		X		1	1
496443	OS-1	7-13	1156		X		X		1	1
496444	OS-1	7-13	1156		X		X		1	1
496445	OS-1	7-13	1156		X		X		1	1
496446	OS-1	7-13	1156		X		X		1	1
496447	OS-1	7-13	1156		X		X		1	1
496448	OS-1	7-13	1156		X		X		1	1
496449	OS-1	7-13	1156		X		X		1	1
496450	OS-1	7-13	1156		X		X		1	1
496451	OS-1	7-13	1156		X		X		1	1
496452	OS-1	7-13	1156		X		X		1	1
496453	OS-1	7-13	1156		X		X		1	1
496454	OS-1	7-13	1156		X		X		1	1
496455	OS-1	7-13	1156		X		X		1	1
496456	OS-1	7-13	1156		X		X		1	1
496457	OS-1	7-13	1156		X		X		1	1
496458	OS-1	7-13	1156		X		X		1	1
496459	OS-1	7-13	1156		X		X		1	1
496460	OS-1	7-13	1156		X		X		1	1
496461	OS-1	7-13	1156		X		X		1	1
496462	OS-1	7-13	1156		X		X		1	1
496463	OS-1	7-13	1156		X		X		1	1
496464	OS-1	7-13	1156		X		X		1	1
496465	OS-1	7-13	1156		X		X		1	1
496466	OS-1	7-13	1156		X		X		1	1
496467	OS-1	7-13	1156		X		X		1	1
496468	OS-1	7-13	1156		X		X		1	1
496469	OS-1	7-13	1156		X		X		1	1
496470	OS-1	7-13	1156		X		X		1	1
496471	OS-1	7-13	1156		X		X		1	1
496472	OS-1	7-13	1156		X		X		1	1
496473	OS-1	7-13	1156		X		X		1	1
496474	OS-1	7-13	1156		X		X		1	1
496475	OS-1	7-13	1156		X		X		1	1
496476	OS-1	7-13	1156		X		X		1	1
496477	OS-1	7-13	1156		X		X		1	1
496478	OS-1	7-13	1156		X		X		1	1
496479	OS-1	7-13	1156		X		X		1	1
496480	OS-1	7-13	1156		X		X		1	1
496481	OS-1	7-13	1156		X		X		1	1
496482	OS-1	7-13	1156		X		X		1	1
496483	OS-1	7-13	1156		X		X		1	1
496484	OS-1	7-13	1156		X		X		1	1
496485	OS-1	7-13	1156		X		X		1	1
496486	OS-1	7-13	1156		X		X		1	1
496487	OS-1	7-13	1156		X		X		1	1
496488	OS-1	7-13	1156		X		X		1	1
496489	OS-1	7-13	1156		X		X		1	1
496490	OS-1	7-13	1156		X		X		1	1
496491	OS-1	7-13	1156		X		X		1	1
496492	OS-1	7-13	1156		X		X		1	1
496493	OS-1	7-13	1156		X		X		1	1
496494	OS-1	7-13	1156		X		X		1	1
496495	OS-1	7-13	1156		X		X		1	1
496496	OS-1	7-13	1156		X		X		1	1
496497	OS-1	7-13	1156		X		X		1	1
496498	OS-1	7-13	1156		X		X		1	1
496499	OS-1	7-13	1156		X		X		1	1
496500	OS-1	7-13	1156		X		X		1	1
496501	OS-1	7-13	1156		X		X		1	1
496502	OS-1	7-13	1156		X		X		1	1
496503	OS-1	7-13	1156		X		X		1	1
496504	OS-1	7-13	1156		X		X		1	1
496505	OS-1	7-13	1156		X		X		1	1
496506	OS-1	7-13	1156		X		X		1	1
496507	OS-1	7-13	1156		X		X		1	1
496508	OS-1	7-13	1156		X		X		1	1
496509	OS-1	7-13	1156		X		X		1	1
496510	OS-1	7-13	1156		X		X		1	1
496511	OS-1	7-13	1156		X		X		1	1
496512	OS-1	7-13	1156		X		X		1	1
496513	OS-1	7-13	1156		X		X		1	1
496514	OS-1									

```

=====
Injection Date   : 7/14/2011 9:26:40 PM      Seq. Line :   15
Sample Name     : 496361                    Location  : Vial 15
Acq. Operator   : tsj                      Inj       :    1
Acq. Instrument : GC-5                      Inj Volume: 1 µl
Acq. Method     : C:\HPCHEM\5\METHODS\!TEST3.M
Last changed    : 7/9/2010 4:04:34 PM by csd
Analysis Method : C:\HPCHEM\5\METHODS\E060711H.M
Last changed     : 6/27/2011 8:42:39 AM by tsj
=====

```



```

=====
External Standard Report
=====

```

```

Sorted By       :      Signal
Calib. Data Modified : 6/27/2011 8:42:24 AM
Multiplier      :      1.0000
Dilution        :      20.0000
Use Multiplier & Dilution Factor with ISTDs

```

Signal 1: FID1 A,

RetTime [min]	Type	Area counts*s	Amt/Area	Amount [ppm]	Grp	Name
6.950	HHA+	4.60735e6	2.96400e-7	27.31241		DRO

Totals : 27.31241

Results obtained with enhanced integrator!

```

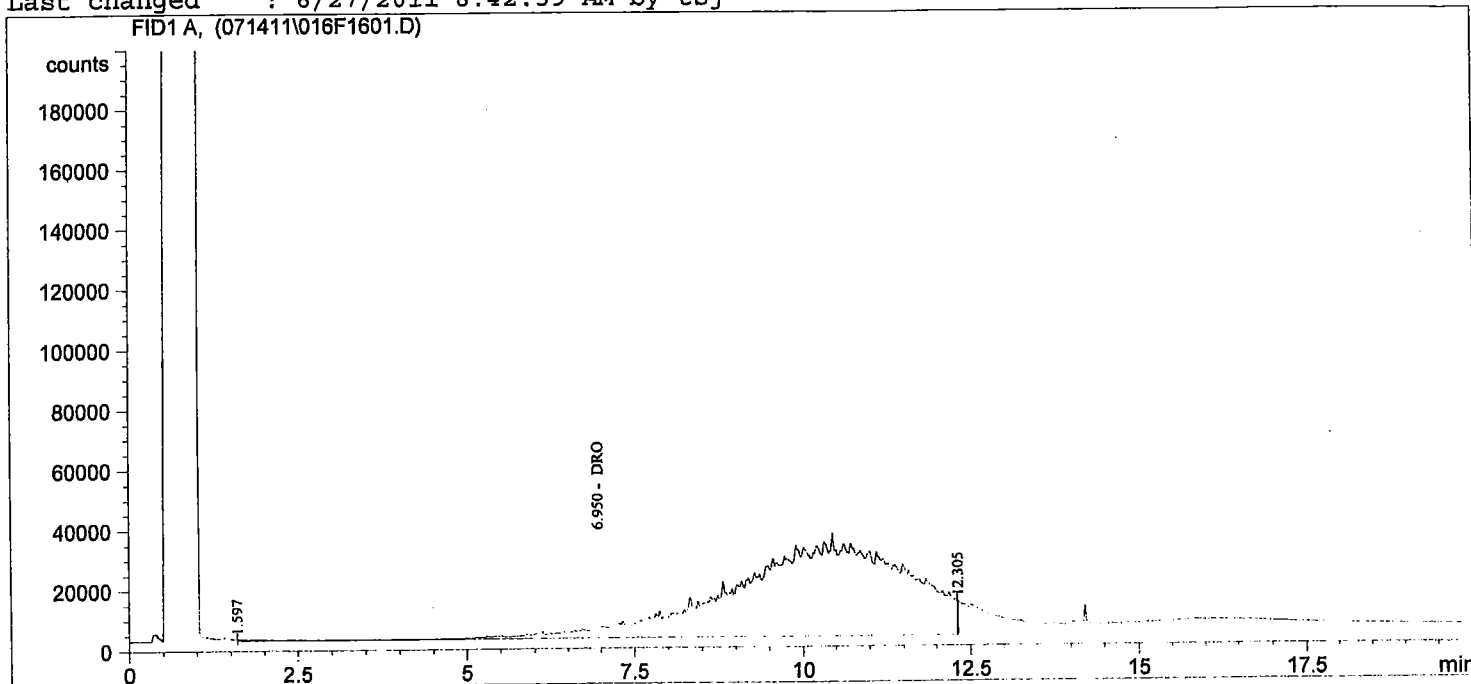
=====
*** End of Report ***

```


=====

Injection Date	: 7/14/2011 9:54:09 PM	Seq. Line	: 16
Sample Name	: 496362	Location	: Vial 16
Acq. Operator	: tsj	Inj	: 1
Acq. Instrument	: GC-5	Inj Volume	: 1 µl
Acq. Method	: C:\HPCHEM\5\METHODS\!TEST3.M		
Last changed	: 7/9/2010 4:04:34 PM by csd		
Analysis Method	: C:\HPCHEM\5\METHODS\E060711H.M		
Last changed	: 6/27/2011 8:42:39 AM by tsj		

=====



=====

External Standard Report

=====

Sorted By : Signal

Calib. Data Modified : 6/27/2011 8:42:24 AM

Multiplier : 1.0000

Dilution : 50.0000

Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A,

RetTime [min]	Type	Area counts*s	Amt/Area	Amount [ppm]	Grp	Name
6.950	HHA+	5.79260e6	2.93326e-7	84.95583		DRO

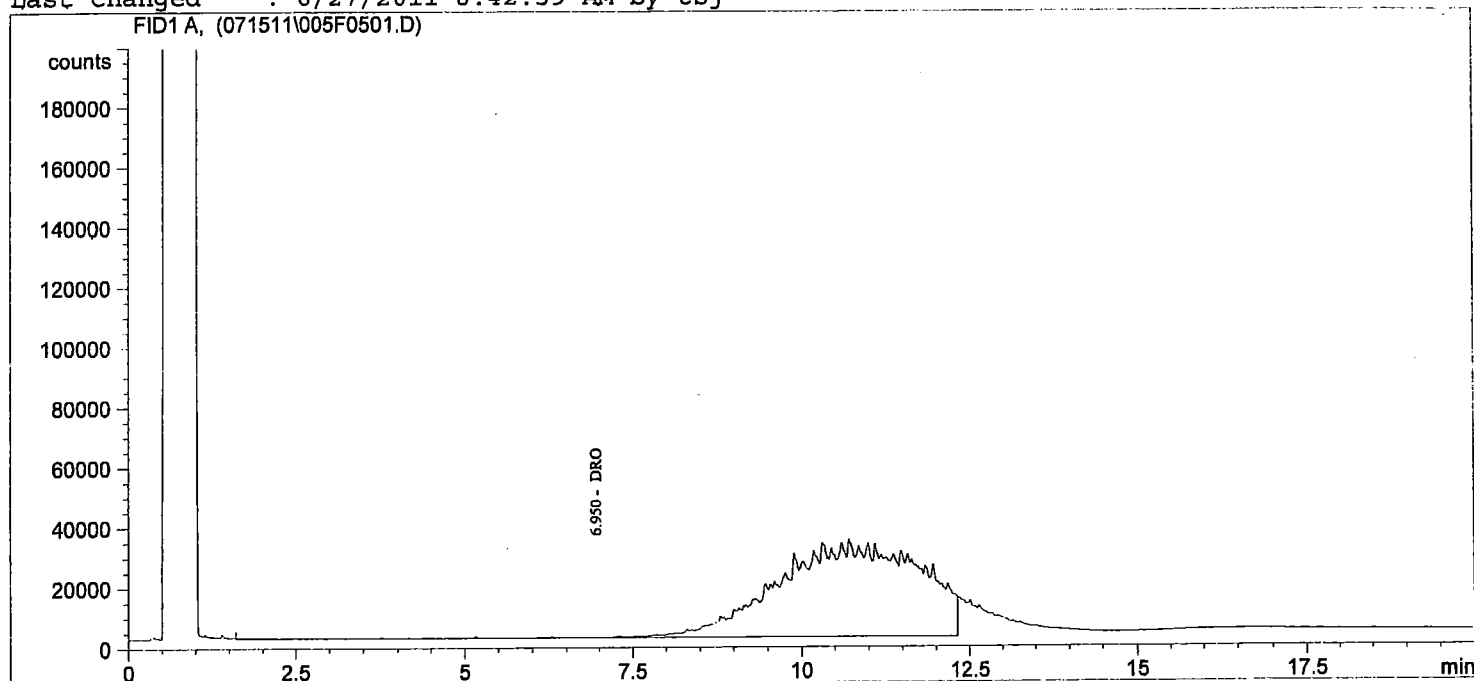
Totals : 84.95583

Results obtained with enhanced integrator!

=====

*** End of Report ***

```
=====
Injection Date   : 7/15/2011 12:10:14 PM      Seq. Line :    5
Sample Name      : 496363                     Location  : Vial 5
Acq. Operator    : tsj                        Inj       :    1
Acq. Instrument  : GC-5                       Inj Volume: 1 µl
Acq. Method      : C:\HPCHEM\5\METHODS\!TEST3.M
Last changed     : 7/9/2010 4:04:34 PM by csd
Analysis Method  : C:\HPCHEM\5\METHODS\E060711H.M
Last changed     : 6/27/2011 8:42:39 AM by tsj
=====
```



```
=====
                        External Standard Report
=====
```

```
Sorted By      :      Signal
Calib. Data Modified : 6/27/2011 8:42:24 AM
Multiplier     :      1.0000
Dilution       :      10.0000
Use Multiplier & Dilution Factor with ISTDs
```

Signal 1: FID1 A,

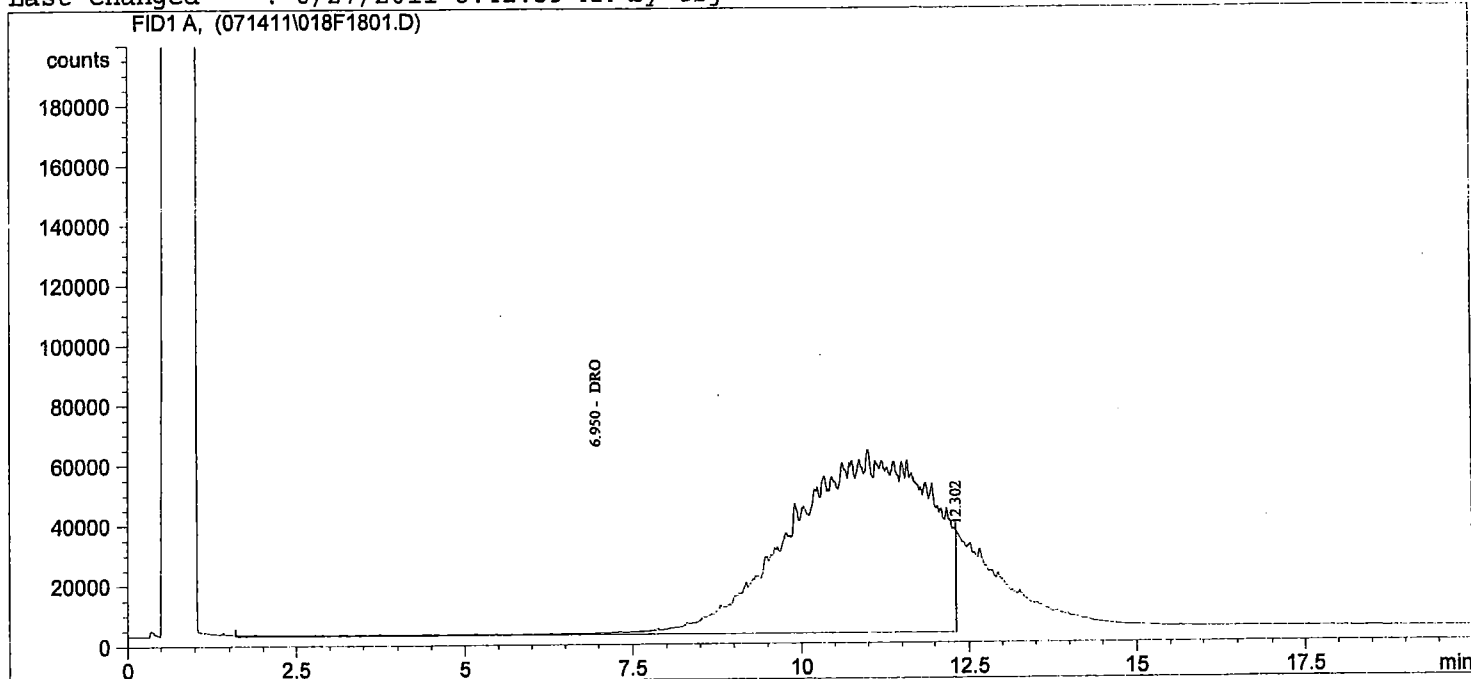
RetTime [min]	Type	Area counts*s	Amt/Area	Amount [ppm]	Grp	Name
6.950	HHA+	4.67821e6	2.96173e-7	13.85560		DRO

Totals : 13.85560

Results obtained with enhanced integrator!

```
=====
                        *** End of Report ***
=====
```


=====
Injection Date : 7/14/2011 10:49:18 PM Seq. Line : 18
Sample Name : 496364 Location : Vial 18
Acq. Operator : tsj Inj : 1
Acq. Instrument : GC-5 Inj Volume : 1 µl
Acq. Method : C:\HPCHEM\5\METHODS\!TEST3.M
Last changed : 7/9/2010 4:04:34 PM by csd
Analysis Method : C:\HPCHEM\5\METHODS\E060711H.M
Last changed : 6/27/2011 8:42:39 AM by tsj
=====



=====
External Standard Report
=====

Sorted By : Signal
Calib. Data Modified : 6/27/2011 8:42:24 AM
Multiplier : 1.0000
Dilution : 50.0000
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A,

RetTime [min]	Type	Area counts*s	Amt/Area	Amount [ppm]	Grp	Name
6.950	HHA+	8.78286e6	2.89256e-7	127.02475		DRO

Totals : 127.02475

Results obtained with enhanced integrator!

=====
*** End of Report ***

Monday, October 24, 2011



NTS
Attn: Doug Fossell
526 Chestnut Street
Virginia, MN 55792

RE: Pace COC 119115
Revised Report - Additional parameter requested

Dear Doug Fossell,

Enclosed are the analytical results for sample(s) received by the laboratory on September 12, 2011. On September 28, 2011, silica gel cleanup was requested for Pace Sample ID 510018 labeled Oil Can.

The results relate only to the samples included in this report. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Dan Toms".

Dan Toms
Project Manager



SAMPLE SUMMARY



Laboratory Results

Pace Analytical Services

315 Chestnut Street
PO Box 1212
Virginia, MN 55792
Phone: 218-742-1042
Fax: 218-742-1010

Virginia MDH Certification: 027-137-445

Duluth MDH Certification: 027-137-446

PACE COC: 119115

Client: - NTS

Project: VM7158JA - Hay Lake Dump Cleanup

Sampled By: D. Fossell

Report Date: 10/24/2011

Sample Description	Sample ID	Sample Type	Matrix	Sample Date	Received Date
Oil Can-1	510018	Grab	Non-Aqueous	9/10/2011 13:30	9/12/2011 15:06
Milk Truck	510019	Grab	Non-Aqueous	9/10/2011 14:30	9/12/2011 15:06

This report may not be reproduced, except in full, without written consent of Pace Analytical.

Results apply only to the sample received. Results for solid matrices are based on dry weight, unless noted.

Analysis was performed in accordance with methods approved by the US EPA and the Minnesota Department of Health, where applicable, unless noted in the report.

SAMPLE RESULTS

PACE Sample: 510018
Description: Oil Can-1
Sample Date: 9/10/2011 1:30:00 PM

Matrix: Non-Aqueous
Sample Type: Grab

PACE COC: 119115
Client: - NTS
Project: VM7158JA - Hay Lake Dump Cleanup
Sampled By: D. Fossell
Report Date: 10/24/2011
Rec'd Temperature: 2.7 °C

Analyte	Result	RL	Units	Method	Prepared Date	Analysis Date	
DRO	14	8.1	mg/Kg	WI(95) DRO	9/13/2011	9/13/2011 16:32	D,r,q

Qualifier	Description	Note
-----------	-------------	------

D	Heavy hydrocarbon compounds detected beyond the DRO window.	
---	---	--

q	Qualified Data.	
---	-----------------	--

r	Duplicate analysis not within control limits.	
---	---	--

Sample results are based on wet weight.

Relative percent difference = 25.5%.

SAMPLE RESULTS

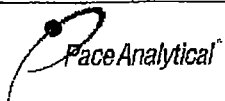
PACE Sample: 510019
Description: Milk Truck
Sample Date: 9/10/2011 2:30:00 PM

Matrix: Non-Aqueous
Sample Type: Grab

PACE COC: 119115
Client: - NTS
Project: VM7158JA - Hay Lake Dump Cleanup
Sampled By: D. Fossell
Report Date: 10/24/2011
Rec'd Temperature: 2.7 °C

Analyte	Result	RL	Units	Method	Prepared Date	Analysis Date	
DRO	61	8.2	mg/Kg	WI(95) DRO		9/13/2011 17:27	D,r,q
DRO w/Silica Gel Cleanup	36	8.6	mg/Kg	WI(95) DRO/3630C	10/3/2011	10/10/2011 11:32	a,D
Benzene	<95	95	µg/Kg	EPA 8021		9/13/2011 22:42	q
Ethyl Benzene	<95	95	µg/Kg	EPA 8021		9/13/2011 22:42	q
GRO	<4.7	4.7	mg/Kg	WI(95) GRO		9/13/2011 22:42	q
Toluene	<95	95	µg/Kg	EPA 8021		9/13/2011 22:42	q
Xylene, Total	<190	190	µg/Kg	EPA 8021		9/13/2011 22:42	q
Solids, Total (TS)	95.5	1	%	SM 2540G, Mod		9/15/2011 16:16	

Qualifier	Description	Note
a	Laboratory Control Spike not within control limits.	Laboratory Control Spike Duplicate recovery = 67%, acceptable range is 70-120%.
D	Heavy hydrocarbon compounds detected beyond the DRO window.	
q	Qualified Data.	Sample results are based on wet weight.
r	Duplicate analysis not within control limits.	Relative percent difference = 25.5%.

	Document Name: Sample Condition Upon Receipt Form	Document Revision: 20 June 2011 Page 1 of 1
	Document No: F-VM-C-001 Rev. 01	Issuing Authority: Pace Virginia Minnesota Quality Office

Client Name: NTS Project # 119115

Courier: ☐ Fed Ex ☐ UPS ☐ USPS ☒ Client ☐ Commercial ☐ Pace Other _____

Tracking #: _____

Custody Seal on Cooler/Box Present: ☐ yes ☒ no Seals intact: ☐ yes ☒ no N/A

Packing Material: ☐ Bubble Wrap ☐ Bubble Bags ☒ None ☐ Other _____

Temp Blank: Yes _____ No ☒

Thermometer Used 101594812

Type of Ice: ☒ Wet ☐ Blue ☐ None

☒ Samples on ice, cooling process has begun

Cooler Temperature 2-7

Biological Tissue is Frozen: Yes ☐ No ☒ N/A

Date and Initials of person examining contents: 9-12-11 CO

Temp should be above freezing to 6°C

Comments:

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5.
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	6.
Rush Turn Around Time Requested:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	7. <u>9-26-11</u>
Sufficient Volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	8.
Correct Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	9.
-Pace Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.
Filtered volume received for Dissolved tests	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	11.
Sample Labels match COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	12.
-Includes date/time/ID/Analysis Matrix: <u>SL</u>		
All containers needing acid/base preservation will be checked and documented in the pH logbook		13. See pH log for results and additional preservation documentation
Headspace in VOA Vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	15.
Trip Blank Custody Seals Present	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Pace Trip Blank Lot #:		

Client Notification/ Resolution:

Field Data Required?

Y / N

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: _____

Date: 9/13/11

CHAIN-OF-CUSTODY / Analytical Request Document
The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Section A

Required Client Information:

Section B

Required Project Information:

Section C

Invoice Information:

Page:

of

1

119115

1504223

Section A Required Client Information: Company: NTS Address: PO Box 1142 Virginia, VA 55792 Email: dfoessel@paceanalytical.com Phone: 741-1024 Fax: 741-4291 Requested Due Date: 9-26-11 / 2 week		Section B Required Project Information: Report To: Doug Fossell / NTS Copy To: Purchase Order No.: Project Name: Hay Lake Dump Cleanup Project Number: 71585A		Section C Invoice Information: Attention: Doug Fossell Company Name: NTS Address: PO Box 1142 Virginia, VA Pace Office Reference: Pace Project Manager: Pace Profile #:		REGULATORY AGENCY: <input type="checkbox"/> NPDES <input type="checkbox"/> GROUND WATER <input type="checkbox"/> DRINKING WATER <input type="checkbox"/> UST <input type="checkbox"/> RCRA <input checked="" type="checkbox"/> OTHER WIC Site Location STATE: MV	
---	--	---	--	--	--	--	--

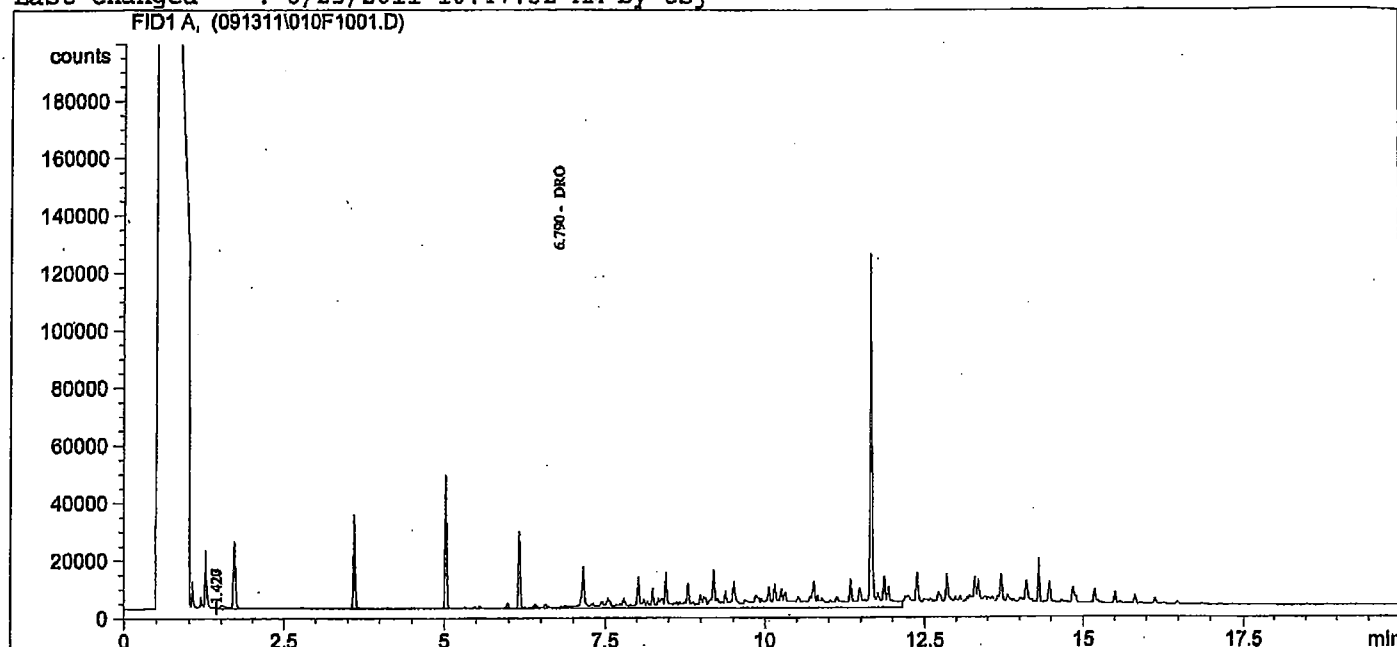
Section D Required Client Information		Matrix Codes MATRIX 1 CODE		COLLECTED		SAMPLE TEMP AT COLLECTION		# OF CONTAINERS		Analysis Test		Residual Chlorine (Y/N)		Pace Project No./ Lab I.D.
SAMPLE ID (A-Z, 0-9 / -) Sample IDs MUST BE UNIQUE		Matrix Codes Drinking Water DW Water WT Waste Water WW Product P Soil/Solid SL Oil OL Wipe WP Air AR Tissue TS Other OT		<div>COMPOSITE START</div> <div>COMPOSITE END/GRAB</div>		SAMPLE TEMP AT COLLECTION		Unpreserved H ₂ SO ₄ HNO ₃ HCl NaOH Na ₂ S ₂ O ₃ Methanol Other		Analysis Test		Residual Chlorine (Y/N)		
1	OIL Can-1	SL	G	DATE	TIME	DATE	TIME	83	33	1	X	X		S10018
2	MILK Truck	SL	G	DATE	TIME			83	33	1	X	X		S10019
3														
4														
5														
6														
7														
8														
9														
10														
11														
12														

ADDITIONAL COMMENTS RELINQUISHED BY / AFFILIATION DATE TIME ACCEPTED BY / AFFILIATION DATE TIME SAMPLE CONDITIONS Temp in °C Received on Ice (Y/N) Custody Sealed Cooler (Y/N) Samples Intact (Y/N)	
ORIGINAL SAMPLER NAME AND SIGNATURE PRINT Name of SAMPLER SIGNATURE of SAMPLER DATE Signed (MM/DD/YY) 09/10/11	

```

=====
Injection Date   : 9/13/2011 4:32:12 PM      Seq. Line :   10
Sample Name     : 510018                    Location  : Vial 10
Acq. Operator   : mes                       Inj       :    1
Acq. Instrument : GC-5                      Inj Volume: 1 µl
Acq. Method     : C:\HPCHEM\5\METHODS\!TEST3.M
Last changed    : 7/9/2010 4:04:34 PM by csd
Analysis Method : C:\HPCHEM\5\METHODS\E060711L.M
Last changed    : 8/23/2011 10:47:32 AM by tsj
=====

```



```

=====
External Standard Report
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```

```

Sorted By      : Signal
Calib. Data Modified : 8/4/2011 3:10:31 PM
Multiplier     : 1.0000
Dilution       : 1.0000
Use Multiplier & Dilution Factor with ISTDs

```

Signal 1: FID1 A,

RetTime [min]	Type	Area counts*s	Amt/Area	Amount [ppm]	Grp	Name
6.790	HHA+	1.41013e6	2.96203e-7	4.17685e-1		DRO

Totals : 4.17685e-1

Results obtained with enhanced integrator!

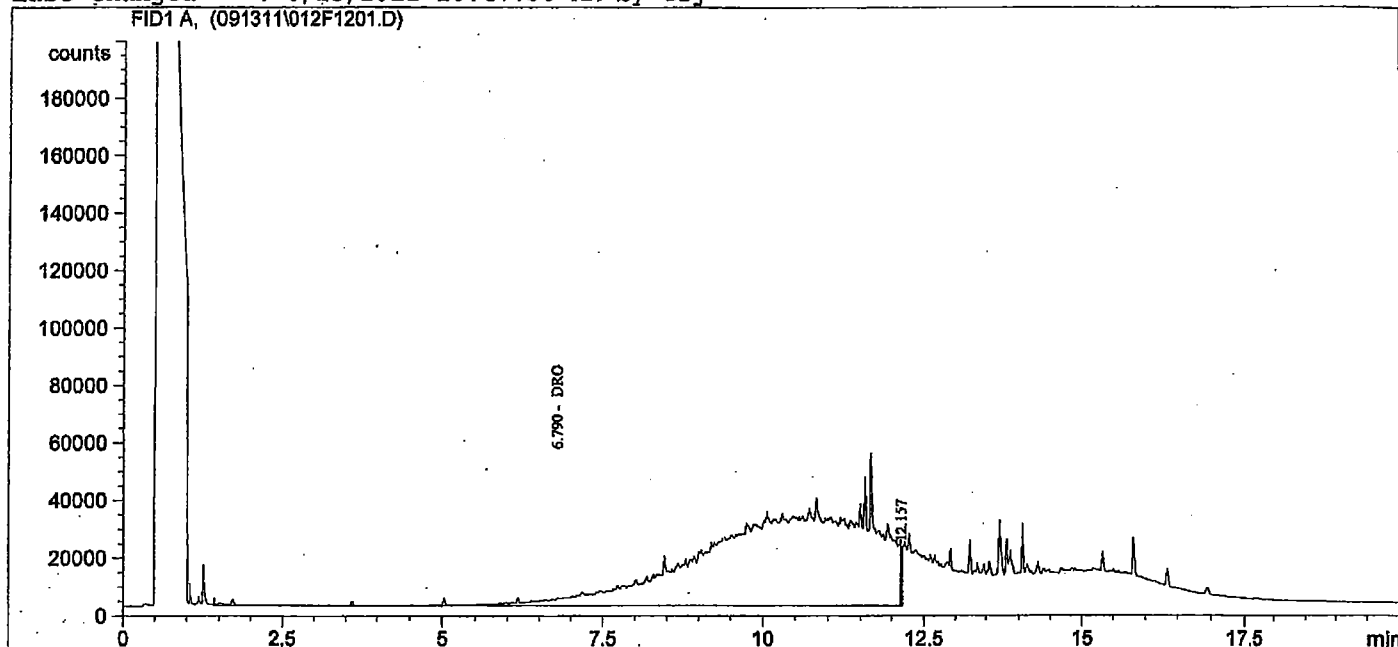
```

=====
*** End of Report ***

```



```
=====
Injection Date : 9/13/2011 5:27:44 PM      Seq. Line : 12
Sample Name    : 510019                    Location  : Vial 12
Acq. Operator  : mes                       Inj       : 1
Acq. Instrument : GC-5                     Inj Volume: 1 µl
Acq. Method    : C:\HPCHEM\5\METHODS\1TEST3.M
Last changed   : 7/9/2010 4:04:34 PM by csd
Analysis Method : C:\HPCHEM\5\METHODS\E060711H.M
Last changed   : 8/23/2011 10:47:58 AM by tsj
=====
```



```
=====
External Standard Report
=====
```

```
Sorted By      : Signal
Calib. Data Modified : 8/4/2011 3:11:21 PM
Multiplier     : 1.0000
Dilution       : 1.0000
Use Multiplier & Dilution Factor with ISTDs
```

Signal 1: FID1 A,

RetTime [min]	Type	Area counts*s	Amt/Area	Amount [ppm]	Grp	Name
------------------	------	------------------	----------	-----------------	-----	------

6.790	HHA+	6.38471e6	2.92217e-7	1.86572		DRO
-------	------	-----------	------------	---------	--	-----

Totals : 1.86572

Results obtained with enhanced integrator!

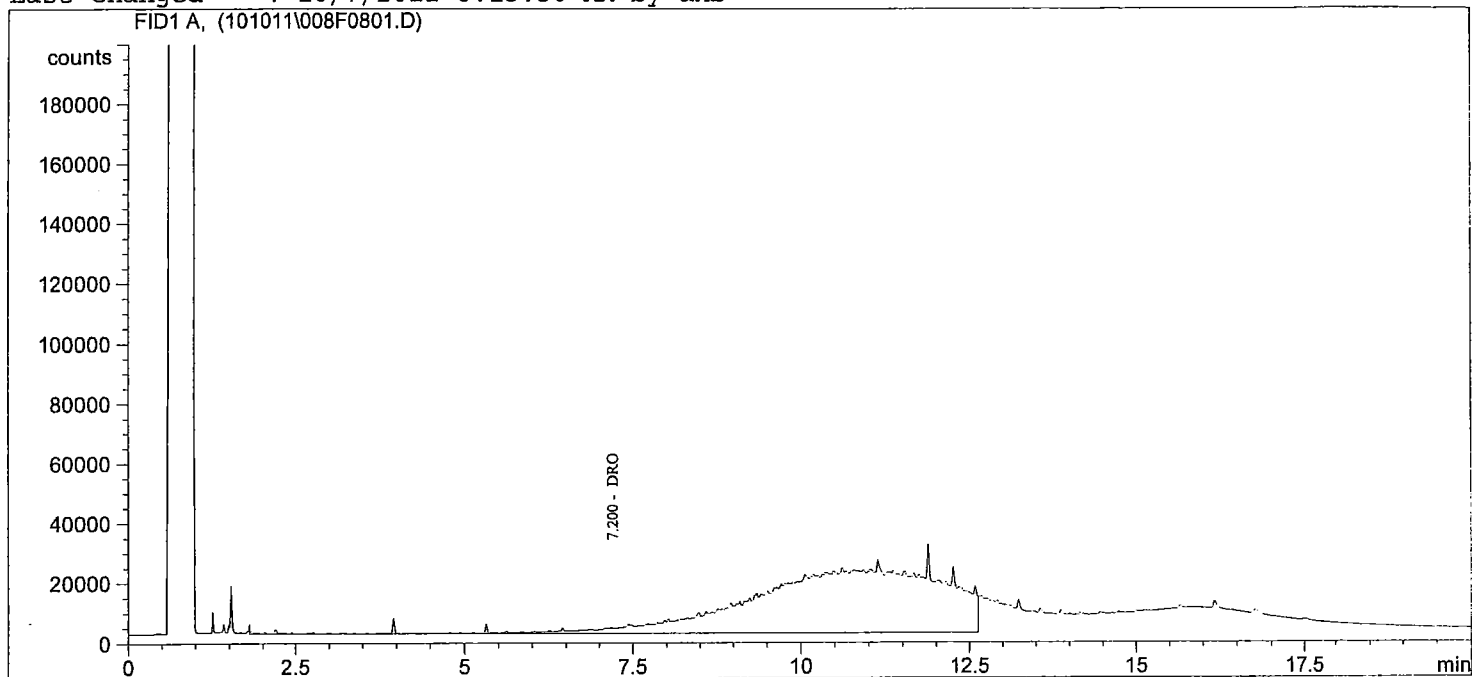
```
=====
*** End of Report ***
```

```

=====
Injection Date   : 10/10/2011 11:32:04 AM      Seq. Line   :    8
Sample Name     : 510019                      Location    : Vial 8
Acq. Operator   : csd                        Inj         :    1
Acq. Instrument : GC-5                      Inj Volume  : 1 µl
Sequence File   : C:\HPCHEM\5\SEQUENCE\101011.S
Acq. Method     : C:\HPCHEM\5\METHODS\!TEST3.M
Last changed    : 7/9/2010 4:04:34 PM by csd
Analysis Method : C:\HPCHEM\5\METHODS\E100611.M
Last changed    : 10/7/2011 8:13:50 AM by akb
=====

```

SG
Cleanup



```

=====
                        External Standard Report
=====

```

```

Sorted By           :      Signal
Calib. Data Modified :      10/7/2011 8:13:47 AM
Multiplier          :      1.0000
Dilution            :      1.0000
Use Multiplier & Dilution Factor with ISTDs

```

Signal 1: FID1 A,

RetTime [min]	Type	Area counts*s	Amt/Area	Amount [ppm]	Grp	Name
7.200	HHA+	4.43714e6	2.33481e-7	1.03599		DRO

Totals : 1.03599

Results obtained with enhanced integrator!

```

=====
                        *** End of Report ***
=====

```