

December 5, 2022

Report to Town of Primrose and Primrose Gun and Conservation Club

Topic: Lead levels in soil within club sporting clay area

On September 19 Geoff Siemering, UW Madison Extension, met with representatives of the Primrose Gun and Conservation Club, town council and club neighbors at the club sporting clay shooting area. After a discussion of lead (Pb) and polycyclic aromatic hydrocarbon (PAH) soil contamination, the group moved to sample the area in question.

Surface samples were analyzed for a range of elements using a portable x-ray fluorescence (XRF) spectrometer by Mr. Siemering. Composite samples of 30 increments each were collected by group members using stainless steel soil probes provided by Mr. Siemering. Each increment was a 1" diameter 4" deep soil plug collected by pushing the steel probe into the ground, twisting and pulling the probe up. The plugs were then deposited into a plastic bucket for further processing.

The composite samples were collected from three regions within the shooting area. Region 1 is beyond the further range that shot is expected to fall and can be considered to give background soil elemental values. Region 2 is from the furthest range that shot can be expected to fall to where shot is estimated to likely fall (per club member estimates). Region 3 is the area where shot is expected to fall most heavily. Surface XRF Pb sample analysis confirmed estimates of shot fall density. One additional composite sample was collected within the area closest to the gun stands for analysis for PAH compounds. A map of the sample locations is attached.

Mr. Siemering brought the four composite sample containers back to the UW Madison campus for further processing and analysis. The samples for lead analysis were air dried, deaggregated with a mortar and pestle, and sieved through a 2mm sieve to isolate the soil fraction of the sample collected. Material smaller than 2mm is considered the soil fraction and this removes all larger rock fragments and plant material. After sieving the composite samples were mixed thoroughly and three subsamples were analyzed using the XRF. The sample for PAH analysis was dried, aggregates broken apart by hand and obvious sporting clay fragments removed. This sample analyzed by CT Laboratories (Baraboo, WI). The data for this analysis appended to the end of this report.

Sample analysis showed that the soil lead background values for the area are approximately 12ppm (mg/kg) (Region 1). Region 2 showed a slight increase to 24ppm. Region 3 soil averaged 198ppm. The region 3 surface sample were generally higher than the composite. This is likely due to dilution from soil with lower lead concentrations from below the surface being mixed with higher Pb surface soil. The variation (79-307ppm) seen in the samples analyzed from Region 3 are typical of that expected with discrete sample analysis as soil is a highly heterogeneous matrix. Composite sampling helps to smooth out the variation and give more

Department of Soil Science College of Agricultural and Life Sciences

University of Wisconsin-Madison 1525 Observatory Drive Madison, Wisconsin 53706-1207 608-262-2633. Fax: 608-265-2595 www.soils.wisc.edu useful scientific data. The data from the discrete and composite samples are provided as a PDF file. No other elemental enrichment was noted beyond that for Pb.

As expected, the area of highest shot fall showed the highest Pb concentration. At approximately 200ppm, per WDNR guidelines, a "spill" would be considered to have occurred (and hence need to be reported), but a cleanup not mandated as would be the case above 400ppm. One item to note is that no visible shot fragments were observed in the sieved soil. As most shot used at the club is larger than 2mm, it is likely that future "shot harvesting" will not reduce this Pb concentration. The elevated soil Pb levels are likely due to oxidation of the Pb materials and dissolution of the shot into the soil. As use continues, it can be expected that the surface Pb concentrations will continue to increase.

As noted during the discussion at the club, Pb tends to remain in the soil where it is deposited with minimal downward movement in the soil column. It is unlikely that lead contamination at the club will impact local well water supplies. Large rain events can move the contaminated soil downslope and off site. Current site management with the area tilled and planted will reduce the potential for soil runoff. Continued vegetative cover is recommended.

If the club ceases operation and the land is sold, potential buyers should be notified of the Pb soil contamination. An environmental restoration of the area would likely involve the removal and off-site disposal of the top several inches of soil from the most impacted areas. Reuse on site is possible of human contact is prevented and work done in accordance with WDNR guidelines and approvals.

The lead present does not constitute a hazard to the plants growing in the field nor the shooters at the end of the field. There is the potential for elevated Pb levels in the soybeans, but confirmation of this would take further study. If only used as a forage area for wild deer there would be no hazard from deer harvested from the area. In management of the contaminated soil, it is most important to limit contact with the soil. This includes field preparation for planting. The field preparation can result in lead contaminated soil being stuck to boots and tractor tires and implements. This can then cause the lead contaminated material to be transported to areas where it is not expected. Working the area when it is sufficiently dry will prevent most of this soil transport.

Sulfy & Diemoning

Geoffrey Siemering, MS



Primrose Gun Club sporting clay fall area soil PAH values.

The polycyclic aromatic hydrocarbon (PAH) soil test results from a single composite soil sample collected from the sporting clay fall area are shown in Table 1. Sporting clays are almost exclusively made from clay, colorant, and coal tar. The coal tar is the source of the PAH compounds.

Five of the tested compounds (Benz[a]anthracene, Benzo[a]pyrene, Benzo[b]fluoranthene, Dibenz[a,h]anthracene, Indeno[1,2,3-c,d]pyrene) exceed the WDNR direct contact residual contaminant limits (RCL) for soil. For comparison purposes the PAH soil background values determined for the urban core of Milwaukee are also shown.

Based on the Milwaukee study DNR proposed to increase the RCLs by 10x but this change did not make it through the complete rule making process. With the RCLs increased 10X benzo(a)pyrene would still exceed by 2X the allowable limit.

The level of soil contamination is not surprising based on similar investigations by the U.S. Department of Defense. As more sporting clays are dispersed on the ground in this area the contaminant concentration levels will continue to increase. The compounds listed above are generally immobile in the soil and do not pose a threat to groundwater supplies. Surface water supplies may be impacted if soil is washed from the field directly into the nearby stream in a large rain event.

While organic compounds do decompose in soil, the compounds listed above are known to be particularly persistent in soil with residence times of multiple decades.

As with the soil lead found at the club, the primary health risk to human from these PAHs would be if the land use changes and the area is converted to playgrounds, gardens or another activity where high human-soil contact takes place.

Table 1. Soil PAH values.

PAH Compound (carcinogen in bold)	Primrose Gun Club, sporting clay fall area (mg/kg)	WNDR direct contact RCL (mg/kg)	Milwaukee Background PAH values (mg/kg)			
Acenaphthene	0.076	3590	0.05			
Acenaphthylene	0.00397	NA	0.0352			
Anthracene	0.159	17900	0.118			
Benz[a]anthracene	<u>1.91</u>	1.14	0.599			
Benzo[a]pyrene	<u>2.81</u>	0.115	0.68			
Benzo[b]fluoranthene	<u>3.4</u>	1.15	0.878			
Benzo[e]pyrene	2.00	NA	NA			
Benzo[g,h,i]perylene	2.34	NA	0.465			
Benzo[k]fluoranthene	1.16	11.5	0.514			
Chrysene	1.84	115	0.764			
Dibenz[a,h]anthracene	<u>0.388</u>	0.115	0.144			
Fluoranthene	1.59	2390	1.358			
Fluorene	0.0302	2390	0.0521			
Indeno[1,2,3- c,d]pyrene	<u>2.36</u>	1.15	0.422			
1-Methylnaphthalene	0.00484	17.6	0.0373			
2-Methylnaphthalene	0.00784	239	0.03965			
Naphthalene	0.00865	5.52	0.06894			
Phenanthrene	0.45	NA	0.558			



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ANALYTICAL REPORT

UW MADISON SOIL SCIENCE	Project Name: PRIMROSE GUN CLUB	Page 1 of 3		
GEOFF SIEMERING	Project Phase: PRIMROSE, WI	Arrival Temperature	: See COC	
1525 OBSERVATORY DRIVE	Contract #: 3089	Report Date: 12/5/2022		
MADISON, WI 53706	Project #:	Date Received: 11/8	3/2022	
	Folder #: 173533	Reprint Date:	12/5/2022	
	Purchase Order #:			

CT LAB Sample#: 1260865 Samp	le Description: SPORTI	NG CLAY SOIL							Sampled	: 9/25/2022 11:00	
Analyte	Result	Units	LOD	LOQ	Dilution	Qualifier	Prep Date/Time	Analysis Date/Time	Analyst	Method	
norganic Results											
Solids, Percent	98.8	%			1			11/9/2022 1	:35 BMM	EPA 8000C	
Drganic Results											
I-Methylnaphthalene	4.84	ug/kg	1.2 *	5.1	1		11/21/2022 09:00	11/30/2022 1	:39 JJY	EPA 8270D-SIN	
2-Methylnaphthalene	7.84	ug/kg	1.0	5.1	1		11/21/2022 09:00	11/30/2022 1	:39 JJY	EPA 8270D-SIN	
Acenaphthene	76.0	ug/kg	1.0	5.1	1		11/21/2022 09:00	11/30/2022 1	:39 JJY	EPA 8270D-SIM	
cenaphthylene	3.97	ug/kg	1.0 *	5.1	1		11/21/2022 09:00	11/30/2022 1	:39 JJY	EPA 8270D-SIM	
nthracene	159	ug/kg	1.1	5.1	1		11/21/2022 09:00	11/30/2022 1	:39 JJY	EPA 8270D-SIN	
Benzo(a)anthracene	1910	ug/kg	100	510	100	Y	11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIM	
Benzo(a)pyrene	2810	ug/kg	91	510	100	Y	11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIN	
Benzo(b)fluoranthene	3400	ug/kg	100	510	100	Y	11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIN	
Benzo(e)pyrene	2000	ug/kg	91	510	100	Y	11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIN	
Benzo(g,h,i)perylene	2340	ug/kg	120	510	100	Y	11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIN	
enzo(k)fluoranthene	1160	ug/kg	100	510	100	Y	11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIM	
hrysene	1840	ug/kg	100	510	100	Y	11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIN	
ibenzo(a,h)anthracene	388	ug/kg	120 *	510	100	Y	11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIM	

Unless specifically stated to the contrary, soil/sediment/sludge sample results/LOD/LOQ/RLs were reported on a Dry Weight Basis



UW MADISON SOIL SCIENCE Project Name: PRIMROSE GUN CLUB Project #: Project Phase: PRIMROSE, WI Contract #: 3089 Folder #: 173533 Page 2 of 3

CT LAB Sample#: 1260865	LAB Sample#: 1260865 Sample Description: SPORTING CLAY SOIL Sam												
Analyte	Result	Units	LOD	LOQ	Dilution	Qualifier	Prep Date/Time	Analysis Analyst Date/Time		Method			
Fluoranthene	1590	ug/kg	120	510	100		11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIM			
Fluorene	30.2	ug/kg	0.91	5.1	1		11/21/2022 09:00	11/30/2022 1	4:39 JJY	EPA 8270D-SIM			
Indeno(1,2,3-cd)pyrene	2360	ug/kg	120	510	100	Y	11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIM			
Naphthalene	8.65	ug/kg	1.0	5.1	1		11/21/2022 09:00	11/30/2022 1	4:39 JJY	EPA 8270D-SIM			
Phenanthrene	450	ug/kg	120 *	510	100		11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIM			
Pyrene	2050	ug/kg	91	510	100	Y	11/21/2022 09:00	12/2/2022 1	5:09 JJY	EPA 8270D-SIM			



UW MADISON SOIL SCIENCE Project Name: PRIMROSE GUN CLUB Project #: Project Phase: PRIMROSE, WI Contract #: 3089 Folder #: 173533 Page 3 of 3

Notes regarding entire Chain of Custody:

Notes: * Indicates a value in between the LOD (limit of detection) and the LOQ (limit of quantitation). All LOD/LOQs are adjusted to reflect dilution and also any differences in the sample weight / volume as compared to standard amounts. All samples were received intact and properly preserved unless otherwise noted. The results reported relate only to the samples tested. This report shall not be reproduced, except in full, without written approval of this laboratory. The Chain of Custody is attached. Submitted by: Brett M. Szymanski Project Manager 608-356-2760 **QC Qualifiers Current CT Laboratories Certifications** Description Code в Analyte detected in the associated Method Blank. Wisconsin (WDNR) Chemistry ID# 157066030 С Toxicity present in BOD sample. Wisconsin (DATCP) Bacteriology ID# 289 D Diluted Out. Louisiana NELAP (primary) ID# 115843 Е Safe, No Total Coliform detected. Illinois NELAP Lab ID# 200073 F Unsafe, Total Coliform detected, no E. Coli detected. Kansas NELAP Lab ID# E-10368 G Unsafe, Total Coliform detected and E. Coli detected. Virginia NELAP Lab ID# 460203 н Holding time exceeded. ISO/IEC 17025-2005 A2LA Cert # 3806.01 Incubator temperature was outside acceptance limits during test period. Estimated value. DoD-ELAP A2LA 3806.01 .1 Significant peaks were detected outside the chromatographic window. L Matrix spike and/or Matrix Spike Duplicate recovery outside acceptance limits. м Ν Insufficient BOD oxygen depletion. 0 Complete BOD oxygen depletion. Concentration of analyte differs more than 40% between primary and confirmation analysis. Ρ Q Laboratory Control Sample outside acceptance limits. R See Narrative at end of report. s Surrogate standard recovery outside acceptance limits due to apparent matrix effects. т Sample received with improper preservation or temperature. U Analyte concentration was below detection limit. v Raised Quantitation or Reporting Limit due to limited sample amount or dilution for matrix background interference. w Sample amount received was below program minimum. x Analyte exceeded calibration range. Υ Replicate/Duplicate precision outside acceptance limits. z Specified calibration criteria was not met.

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