Annual Groundwater Monitoring Report

Kentucky Power Company Mitchell Plant Bottom Ash Pond Moundsville, WV

January 2023

Prepared by: American Electric Power Service Corporation 1 Riverside Plaza Columbus, Ohio 43215



An **AEP** Company

BOUNDLESS ENERGY**

Table of Contents

I.	Overview	. 1
II.	Groundwater Monitoring Well Locations and Identification Numbers	. 2
III.	Monitoring Wells Installed or Decommissioned	. 2
IV. Disc	Groundwater Quality Data and Static Water Elevation Data, With Flow Rate and Direction and cussion	. 2
V.	Groundwater Quality Data Statistical Analysis	. 3
VI.	Alternative Source Demonstrations	. 3
VII. Frec	Discussion About Transition Between Monitoring Requirements or Alternate Monitoring juency	.3
	. Other Information Required	
IX.	Description of Any Problems Encountered in 2022 and Actions Taken	.4
X.	A Projection of Key Activities for the Upcoming Year	.4

- Appendix 1 Groundwater Data Tables and Figures
- Appendix 2 Statistical Analyses
- Appendix 3 Alternative Source Demonstrations
- Appendix 4 Notices for Monitoring Program Transitions
- Appendix 5 Well Installation/Decommissioning Logs

I. <u>Overview</u>

This *Annual Groundwater Monitoring Report* (Report) has been prepared to report the status of activities for the preceding year for the Bottom Ash Pond at Kentucky Power Company's, a wholly owned subsidiary of American Electric Power Company (AEP), Mitchell Power Plant. The USEPA's CCR rules require that the Annual Groundwater Monitoring Report be posted to the operating record for the preceding year no later than January 31st.

In general, the following activities were completed in 2021:

- The CCR unit was in assessment monitoring at the beginning and end of 2022;
- Groundwater samples were collected on March 15, 2022 and analyzed in accordance with 40 CFR 257.95(b) for all Appendix IV constituents. Groundwater samples were collected on May 10 and 11, 2022 in accordance with 40 CFR 257.95(d)(1), and analyzed for all Appendix III constituents and those Appendix IV constituents that were detected during the previous sampling in accordance with 40 CFR 257.95(b) in March 2022. Groundwater samples were collected on October 17, 2022 in accordance with 40 CFR 257.95(d)(1), and analyzed for all Appendix III constituents and those Appendix IV constituents that were detected during the previous sampling in accordance with 40 CFR 257.95(b) in March 2022. Groundwater samples were collected on October 17, 2022 in accordance with 40 CFR 257.95(d)(1), and analyzed for all Appendix III constituents and those Appendix IV constituents that were detected during the previous sampling in accordance with 40 CFR 257.95(b) in March 2022. All sampling was performed in accordance with 40 CFR 257.95 *et seq.*, and AEP's *Groundwater Sampling and Analysis Plan (2016)*;
- Groundwater monitoring data underwent various validation tests, including tests for completeness, valid values, transcription errors, and consistent units;
- Statistical analysis of assessment monitoring samples collected on October 19 and 20, 2021 was completed on February 14, 2022. Statistical analysis of assessment monitoring samples collected in March and May 2022 was completed on August 30, 2022;
- Because no statistically significant levels (SSLs) above the groundwater protection standard were detected, assessment monitoring continued;
- No alternative source demonstrations (ASDs) relative to the Appendix IV SSLs above the groundwater protection standard were conducted.

The major components of this annual report, to the extent applicable at this time, are presented in sections that follow:

- A map, aerial photograph or a drawing showing the CCR management unit(s), all groundwater monitoring wells and monitoring well identification numbers;
- All of the monitoring data collected, including the rate and direction of groundwater flow, plus a summary showing the number of samples collected per monitoring well, the dates

the samples were collected, and whether the sample was collected as part of detection monitoring or assessment monitoring programs (Attached as Appendix 1);

- Statistical comparison of monitoring data to determine if there have been statistically significant levels above the groundwater protection standards (Attached as Appendix 2, where applicable);
- A discussion of whether any alternate source demonstrations were performed, and the conclusions (Attached as Appendix 3, where applicable);
- A summary of any transition between monitoring programs, for example the date and circumstances for transitioning from detection monitoring to assessment monitoring (Notices attached as Appendix 4, where applicable);
- Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a statement regarding the rationale for the installation/decommission (Attached as Appendix 5, where applicable); and
- Other information required to be included in the annual report such as an alternate monitoring frequency, or assessment of corrective measures, if applicable.

In addition, this report summarizes key actions completed, and where applicable, describes any problems encountered and actions taken to resolve those problems. The report includes a projection of key activities for the upcoming year.

II. Groundwater Monitoring Well Locations and Identification Numbers

A figure that depicts the PE-certified groundwater monitoring network, the monitoring well locations, and their corresponding identification is provided in Appendix 1.

III. Monitoring Wells Installed or Decommissioned

There were no monitoring wells installed or decommissioned in 2022. The network design, as summarized in the *Groundwater Monitoring Network Design Report* (2016) and as posted at the CCR web site for Mitchell Plant, did not change. That design report, viewable on the AEP CCR web site, discusses the facility location, the hydrogeological setting, the hydrostratigraphic units, the uppermost aquifer, downgradient monitoring well locations, and the upgradient monitoring well locations.

IV. <u>Groundwater Quality Data and Static Water Elevation Data, With Flow Rate and</u> <u>Direction and Discussion</u>

Appendix 1 contains tables showing the groundwater quality data collected during the establishment of background quality, detection monitoring, and assessment monitoring. Static water elevation data from each monitoring event also are shown in Appendix 1, along with the

groundwater velocities, groundwater flow direction, and potentiometric maps developed after each sampling event.

V. Groundwater Quality Data Statistical Analysis

Statistical analysis of assessment monitoring samples collected on October 19 and 20, 2021 was completed on February 14, 2022. Statistical analysis of assessment monitoring samples collected in March and May 2022 was completed on August 30, 2022. Statistical analyses of samples collected during the October 17, 2022 sampling event will be completed in 2023. No SSLs above the groundwater protection standards were identified during either the February 2022 or the August 2022 analysis. The results of these statistical analyses are documented in the corresponding statistical analysis summary reports, which are provided in Appendix 2.

VI. Alternative Source Demonstrations

ASDs relative to Appendix IV SSLs above the groundwater protection standard were not necessary because no SSLs above the groundwater protection standards were identified from the completed sampling events required by 40 CFR 257.95(d)(1). A statement to this effect is provided in Appendix 3.

VII. <u>Discussion About Transition Between Monitoring Requirements or Alternate</u> <u>Monitoring Frequency</u>

No transition between monitoring requirements occurred in 2022; the CCR unit was in assessment monitoring at the beginning and at the end of the year. A statement to this effect is provided in Appendix 4.

The Mitchell bottom ash pond monitoring program would return to detection monitoring if all Appendix III and IV constituents are below background values for two consecutive monitoring events. If one or more Appendix IV constituents exceed the corresponding groundwater protection standard due to a release from the bottom ash pond, and are not demonstrated to be caused by a source other than the CCR unit or resulting from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality by means of an ASD, an assessment of corrective measures will be undertaken as required by 40 CFR 257.96.

Regarding defining an alternate monitoring frequency, the groundwater velocity and monitoring well production is high enough at this facility that no modification of the assessment monitoring schedule is necessary.

VIII. Other Information Required

The Mitchell bottom ash pond has progressed from detection monitoring to its current status in assessment monitoring. All required information has been included in this annual groundwater monitoring report.

IX. <u>Description of Any Problems Encountered in 2022 and Actions Taken</u>

No significant problems were encountered. Through the use of low-flow purging and sampling methodology, samples representative of uppermost aquifer groundwater were obtained and the schedule was met to support this annual groundwater report preparation.

X. <u>A Projection of Key Activities for the Upcoming Year</u>

Key activities for 2023 include the following:

- Assessment monitoring on a semiannual schedule;
- Statistical evaluation of the assessment monitoring results to determine any statistically significant increases (or decreases with respect to pH) over an established groundwater protection standard, or whether the concentrations have returned below background concentrations;
- Responding to any new data received in light of CCR rule requirements;
- Preparation of the next annual groundwater report.

APPENDIX 1 - Groundwater Data Tables and Figures

Tables follow showing the groundwater monitoring data collected, the rate of groundwater flow each time groundwater was sampled, the number of samples collected per monitoring well, dates that the samples were collected, and whether each sample was collected as part of a detection monitoring or an assessment monitoring program. Figures follow showing the PE-certified groundwater monitoring network with the corresponding well identifications along with static water elevation data and groundwater flow directions each time groundwater was sampled in the form of annotated satellite images.

Table 1 - Groundwater Data Summary: MW-1504 Mitchell - BAP Appendix III Constituents

Collection Date	Monitoring Program	Boron	Calcium	Chloride	Fluoride	рН	Sulfate	Total Dissolved Solids
		mg/L	mg/L	mg/L	mg/L	SU	mg/L	mg/L
6/13/2016	Background	0.054	220	99.1	0.23	6.9	375	990
8/1/2016	Background	0.070	220	103	0.25	7.0	403	970
9/26/2016	Background	0.098	225	103	0.24	7.1	389	946
11/8/2016	Background	0.053	219	92.8	0.19	7.1	369	930
2/7/2017	Background	0.162	218	81.7	0.20	7.1	291	904
4/4/2017	Background	0.105	237	89.8	0.21	7.3	362	924
5/16/2017	Background	0.113	225	93.5	0.22	7.2	371	995
7/19/2017	Background	0.129	230	96.3	0.15	7.2	405	999
10/9/2017	Detection	0.114	212	93.4	0.24	7.2	392	982
4/11/2018	Assessment	0.063	204	83.6	0.19	7.0	291	842
8/22/2018	Assessment	0.096	230	91.9	0.20	7.3	372	936
5/1/2019	Assessment	0.05 J1	220	81.8	0.17	8.0	317	926
6/11/2019	Assessment	0.04 J1	183	78.5	0.17	7.6	261	829
10/22/2019	Assessment	0.02 J1	196	85.9	0.15	7.3	242	801
3/17/2020	Assessment				0.15	7.1		
5/5/2020	Assessment	0.04 J1	230	96.2	0.12	7.5	372	1,020
10/20/2020	Assessment	0.082	255		0.14	7.3		1,230
1/7/2021	Assessment			101			292	
3/16/2021	Assessment				0.15	7.7		
5/11/2021	Assessment	0.03 J1	206	101	0.15	8.6	300	908
10/19/2021	Assessment	0.046 J1	252	107	0.15	7.1	467	1,150
3/15/2022	Assessment				0.13	7.2		
5/11/2022	Assessment	0.026 J1	224 M1, P3	79.4	0.12	7.8	239	810
10/17/2022	Assessment	2.86	271	170	0.20	6.9	851	1,630

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report.

- -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit.

In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report.

P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1504 Mitchell - BAP **Appendix IV Constituents**

Collection Date	Monitoring	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Combined Radium	Fluoride	Lead	Lithium	Mercury	Molybdenum	Selenium	Thallium
	Program	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	pCi/L	mg/L	μg/L	mg/L	μg/L	μg/L	μg/L	μg/L
6/13/2016	Background	0.03 J1	0.73	46.2	0.01 J1	0.04	0.4	0.523	0.0838	0.23	0.379	0.002	< 0.002 U1	0.59	0.1	0.02 J1
8/1/2016	Background	0.02 J1	0.52	42.7	0.009 J1	0.04	0.5	0.549	0.248	0.25	0.222	< 0.0002 U1	0.002 J1	0.74	0.07 J1	0.02 J1
9/26/2016	Background	< 0.05 U1	0.38	36.7	< 0.02 U1	0.03 J1	0.3	0.362	0.656	0.24	0.104	0.007	< 0.002 U1	2.31	0.2 J1	0.1 J1
11/8/2016	Background	0.02 J1	0.36	38.4	< 0.005 U1	0.03	0.469	0.249	1.748	0.19	0.041	0.004	< 0.002 U1	0.66	< 0.03 U1	0.089
2/7/2017	Background	0.02 J1	0.39	33.8	< 0.005 U1	0.03	0.530	0.239	0.563	0.20	0.022	0.008	< 0.002 U1	0.94	< 0.03 U1	0.090
4/4/2017	Background	0.02 J1	0.35	40.5	< 0.005 U1	0.04	0.283	0.277	0.327	0.21	0.021	0.009	< 0.002 U1	0.81	0.06 J1	0.110
5/16/2017	Background	0.02 J1	0.46	37.3	< 0.004 U1	0.04	0.250	0.319	0.3882	0.22	0.01 J1	0.011	< 0.002 U1	0.55	0.05 J1	0.02 J1
7/19/2017	Background	0.03 J1	0.41	34.9	< 0.004 U1	0.04	0.175	0.382	0.401	0.15	0.087	0.012	< 0.002 U1	1.25	< 0.03 U1	0.03 J1
4/11/2018	Assessment	0.02 J1	0.36	36.9	0.005 J1	0.03	0.562	0.114	0.349	0.19	0.052	0.004	< 0.004 U1	0.41	0.04 J1	0.03 J1
8/22/2018	Assessment	0.05 J1	0.28	37.9	< 0.004 U1	0.03	0.331	0.093	1.048	0.20	0.037	0.006	< 0.002 U1	0.33	0.04 J1	0.03 J1
5/1/2019	Assessment	< 0.02 U1	0.22	36.4	< 0.02 U1	0.03 J1	0.305	0.071	0.675	0.17	0.02 J1	< 0.009 U1	< 0.002 U1	< 0.4 U1	< 0.03 U1	< 0.1 U1
6/11/2019	Assessment	< 0.02 U1	0.24	33.5	< 0.02 U1	< 0.01 U1	0.05 J1	0.04 J1	0.261	0.17	< 0.02 U1	< 0.009 U1	< 0.002 U1	< 0.4 U1	0.7	< 0.1 U1
10/22/2019	Assessment	0.06 J1	0.29	37.0	< 0.02 U1	0.03 J1	0.399	0.475	0.613	0.15	< 0.05 U1	0.00448	< 0.002 U1	< 0.4 U1	0.05 J1	< 0.1 U1
3/17/2020	Assessment	< 0.02 U1	0.29	48.3	< 0.02 U1	0.03 J1	0.238	0.04 J1	0.4423	0.15	< 0.05 U1	0.00441	< 0.002 U1	< 0.4 U1	7.3	< 0.1 U1
5/5/2020	Assessment	< 0.02 U1	0.26	43.8	< 0.02 U1	0.03 J1	0.238	0.03 J1	0.758	0.12	< 0.05 U1	0.00442	< 0.002 U1	< 0.4 U1	3.8	< 0.1 U1
10/20/2020	Assessment	< 0.02 U1	0.28	41.0	< 0.02 U1	0.03 J1	0.204	0.04 J1	0.093	0.14	< 0.05 U1	0.00430	< 0.002 U1	< 0.4 U1	7.5	< 0.1 U1
3/16/2021	Assessment	< 0.02 U1	0.25	39.2	< 0.007 U1	0.02 J1	0.325	0.03 J1	0.0768	0.15	< 0.05 U1	0.00459	< 0.002 U1	0.2 J1	1.9	< 0.04 U1
5/11/2021	Assessment	< 0.02 U1	0.25	39.2	< 0.007 U1	0.02 J1	0.314	0.03 J1	0.439	0.15	< 0.05 U1	0.00447	< 0.002 U1	1 J1	0.3 J1	< 0.04 U1
10/19/2021	Assessment	< 0.02 U1	0.21	34.8	< 0.007 U1	0.024	0.26	0.027	1.48	0.15	< 0.05 U1	0.00434	< 0.002 U1	0.2 J1	4.38	< 0.04 U1
3/15/2022	Assessment	< 0.02 U1	0.23	40.0	< 0.007 U1	0.018 J1	0.26	0.031	2.16	0.13	0.05 J1	0.00483	< 0.002 U1	0.2 J1	5.69	< 0.04 U1
5/11/2022	Assessment	0.02 J1	0.27	38.1	< 0.007 U1	0.034	0.38	0.334	0.37	0.12	0.08 J1	0.00461	< 0.004 U1	0.2 J1	0.1 J1	< 0.04 U1
10/17/2022	Assessment	0.03 J1	0.34	40.9	< 0.007 U1	0.025	0.36	0.124	0.83	0.20	0.20	0.00600	< 0.007 U1	0.3 J1	9.02	< 0.04 U1

Notes:

 μ g/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report. - -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit. In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report.

P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1505 Mitchell - BAP Appendix III Constituents

Collection Date	Monitoring Program	Boron	Calcium	Chloride	Fluoride	рН	Sulfate	Total Dissolved Solids
		mg/L	mg/L	mg/L	mg/L	SU	mg/L	mg/L
6/14/2016	Background	10.8	288	365	< 0.05 U1	7.1	337	1,530
8/1/2016	Background	10.6	294	358	< 0.05 U1	7.1	337	1,580
9/26/2016	Background	10.3	289	345	< 0.05 U1	7.2	317	1,420
11/8/2016	Background	9.12	261	316	< 0.05 U1	7.2	307	1,470
2/7/2017	Background	10.0	296	318	< 0.05 U1	7.2	317	1,340
4/4/2017	Background	8.80	293	303	< 0.05 U1	7.3	324	1,350
5/16/2017	Background	10.1	278	298	< 0.05 U1	7.2	316	1,550
7/19/2017	Background	9.13	267	293	< 0.05 U1	7.3	318	1,390
10/10/2017	Detection	8.70	255	287	< 0.05 U1	7.2	327	1,270
12/27/2017	Detection	8.02	259	288		7.3		1,220
4/11/2018	Assessment	8.00	282	289	< 0.05 U1	7.0	401	1,220
8/22/2018	Assessment	8.00	274	284	0.02 J1	7.3	383	1,520
5/1/2019	Assessment	7.31	287	285	< 0.01 U1	7.8	408	1,580
6/11/2019	Assessment	7.79	279	261	0.03 J1	7.7	404	1,450
10/22/2019	Assessment	7.37	285	260	0.03 J1	7.2	455	1,480
3/17/2020	Assessment				0.03 J1	7.2		
5/5/2020	Assessment	7.36	282	252	0.02 J1	7.5	471	1,460
10/20/2020	Assessment	6.78	242		0.03 J1	7.3		1,420
1/7/2021	Assessment			240			502	
3/16/2021	Assessment				0.04 J1	7.7		
5/11/2021	Assessment	8.40	281	284	0.04 J1	7.7	599	1,620
10/19/2021	Assessment	8.22 P3, M1	273	265	0.03 J1	7.1	601	1,560 S7
3/15/2022	Assessment				< 0.02 U1	7.3		
5/11/2022	Assessment	3.70	323	185	< 0.05 U1	7.8	927	1,770
10/17/2022	Assessment	6.17	271	253	< 0.05 U1	7.1	983	1,760

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report.

- -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit.

In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report.

P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1505 Mitchell - BAP **Appendix IV Constituents**

Collection Date	Monitoring	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Combined Radium	Fluoride	Lead	Lithium	Mercury	Molybdenum	Selenium	Thallium
	Program	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	pCi/L	mg/L	μg/L	mg/L	μg/L	μg/L	μg/L	μg/L
6/14/2016	Background	0.06	1.40	57.7	0.049	0.03	33.2	0.966	0.466	< 0.05 U1	1.02	0.006	0.002 J1	2.94	0.2	0.074
8/1/2016	Background	0.11	3.73	81.0	0.150	0.05	10.4	2.69	1.2271	< 0.05 U1	3.69	0.011	0.013	0.95	0.9	0.093
9/26/2016	Background	< 0.05 U1	0.79	47.2	< 0.02 U1	0.03 J1	0.9	0.404	0.912	< 0.05 U1	0.546	0.008	< 0.002 U1	7.35	0.4 J1	0.464
11/8/2016	Background	0.07	2.14	63.3	0.091	0.03	7.07	1.77	1.26	< 0.05 U1	2.06	0.007	0.006	0.90	0.5	0.093
2/7/2017	Background	0.04 J1	1.16	51.7	0.035	0.03	9.06	0.772	1.236	< 0.05 U1	0.697	0.010	0.002 J1	1.21	0.5	0.102
4/4/2017	Background	0.03 J1	0.41	47.2	< 0.005 U1	0.02	11.0	0.509	0.4842	< 0.05 U1	0.091	0.007	< 0.002 U1	1.54	0.3	0.057
5/16/2017	Background	0.04 J1	0.73	45.5	0.01 J1	0.02	4.93	0.594	0.604	< 0.05 U1	0.224	0.017	< 0.002 U1	0.85	0.4	0.067
7/19/2017	Background	0.04 J1	0.78	45.9	0.02 J1	0.03 J1	2.38	0.628	1.222	< 0.05 U1	0.434	0.012	< 0.002 U1	1.69	0.9	0.08 J1
4/11/2018	Assessment	0.03 J1	0.44	46.0	0.006 J1	0.03	1.16	0.151	0.582	< 0.05 U1	0.116	0.005	< 0.002 U1	0.67	0.7	0.065
8/22/2018	Assessment	0.05 J1	0.38	48.0	0.007 J1	0.03	1.40	0.257	0.576	0.02 J1	0.150	0.008	< 0.002 U1	1.35	0.4	0.070
5/1/2019	Assessment	0.03 J1	0.29	48.7	< 0.02 U1	0.03 J1	0.665	0.199	0.2396	< 0.01 U1	0.07 J1	< 0.009 U1	< 0.002 U1	0.6 J1	0.9	< 0.1 U1
6/11/2019	Assessment	0.03 J1	0.28	49.3	< 0.02 U1	0.03 J1	0.849	0.155	0.526	0.03 J1	0.04 J1	0.01 J1	< 0.002 U1	0.7 J1	0.4	< 0.1 U1
10/22/2019	Assessment	0.03 J1	0.34	49.9	< 0.02 U1	0.03 J1	0.450	0.143	0.759	0.03 J1	< 0.05 U1	0.00534	< 0.002 U1	< 0.4 U1	0.1 J1	< 0.1 U1
3/17/2020	Assessment	< 0.02 U1	0.31	42.8	< 0.02 U1	0.02 J1	0.624	0.100	0.715	0.03 J1	< 0.05 U1	0.00501	< 0.002 U1	< 0.4 U1	0.06 J1	< 0.1 U1
5/5/2020	Assessment	0.03 J1	0.27	48.4	< 0.02 U1	0.03 J1	0.291	0.096	0.7905	0.02 J1	< 0.05 U1	0.00493	< 0.002 U1	< 0.4 U1	0.06 J1	< 0.1 U1
10/20/2020	Assessment	0.03 J1	0.35	43.0	< 0.02 U1	0.02 J1	0.603	0.151	0.1742	0.03 J1	0.09 J1	0.00501	< 0.002 U1	0.5 J1	0.06 J1	< 0.1 U1
3/16/2021	Assessment	0.03 J1	0.35	48.6	0.01 J1	0.03 J1	0.567	0.211	0.158	0.04 J1	0.1 J1	0.00529	< 0.002 U1	0.3 J1	0.2 J1	0.07 J1
5/11/2021	Assessment	0.03 J1	0.32	48.6	0.008 J1	0.03 J1	0.361	0.218	0.895	0.04 J1	0.1 J1	0.00527	< 0.002 U1	0.6 J1	0.2 J1	0.08 J1
10/19/2021	Assessment	0.03 J1	0.29	38.9	< 0.007 U1	0.025	0.42	0.215	1.98	0.03 J1	0.10 J1	0.00577	< 0.002 U1	0.2 J1	0.09 J1	0.06 J1
3/15/2022	Assessment	0.03 J1	0.38	35.5	0.009 J1	0.022	0.70	0.286	1.27	< 0.02 U1	0.14 J1	0.00664	< 0.002 U1	0.4 J1	2.41	0.07 J1
5/11/2022	Assessment	0.03 J1	0.40	33.5	< 0.007 U1	0.020	0.65	0.245	0.54	< 0.05 U1	0.16 J1	0.00676	< 0.002 U1	0.3 J1	2.76	0.06 J1
10/17/2022	Assessment	0.04 J1	0.57	37.1	0.014 J1	0.017 J1	0.86	0.404	0.90	< 0.05 U1	0.32	0.00705	0.005	0.2 J1	2.82	0.07 J1

Notes:

 μ g/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report. - -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit. In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report. P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1506 Mitchell - BAP Appendix III Constituents

Collection Date	Monitoring Program	Boron	Calcium	Chloride	Fluoride	рН	Sulfate	Total Dissolved Solids
		mg/L	mg/L	mg/L	mg/L	SU	mg/L	mg/L
6/14/2016	Background	8.04	275	422	0.07 J1	7.1	315	1,640
8/2/2016	Background	9.72	299	418	0.07 J1	7.0	325	1,600
9/27/2016	Background	6.77	304	428	< 0.05 U1	7.2	323	1,610
11/9/2016	Background	5.50	281	392	< 0.05 U1	7.4	285	1,510
2/8/2017	Background	5.70	289	395	< 0.05 U1	7.3	292	1,350
4/5/2017	Background	5.59	282	389	< 0.05 U1	7.4	301	1,430
5/17/2017	Background	7.11	278	393	< 0.05 U1	7.3	307	1,520
7/19/2017	Background	6.26	277	379	< 0.05 U1	7.3	297	1,480
10/10/2017	Detection	8.03	257	357	< 0.05 U1	7.3	326	1,390
12/27/2017	Detection	6.14	264	383		7.3		1,280
4/11/2018	Assessment	5.73	275	382	< 0.05 U1	7.1	347	1,300
8/22/2018	Assessment	5.91	270	369	0.05 J1	7.4	349	1,590
5/1/2019	Assessment	5.24	280	331	0.03 J1	7.9	347	1,360
6/11/2019	Assessment	5.27	265	315	0.05 J1	7.8	335	1,370
10/22/2019	Assessment	4.49	293	364	0.04 J1	7.4	354	1,330
3/17/2020	Assessment				0.04 J1	7.3		
5/5/2020	Assessment	4.07	290	379	0.03 J1	7.5	337	1,530
10/20/2020	Assessment	4.59	265		0.04 J1	7.4		1,490
1/7/2021	Assessment			259			404	
3/16/2021	Assessment				0.06 J1	7.6		
5/11/2021	Assessment	5.81	245	228	0.06	7.6	477	1,330
10/19/2021	Assessment	5.90	282	328	0.04 J1	7.3	399	1,340 S7
3/15/2022	Assessment				0.04 J1	7.4		
5/10/2022	Assessment	3.72	283	195	< 0.05 U1	8.9	703	1,450 S7, L1
10/17/2022	Assessment	5.03 M1, P3	272 M1, P3	227	< 0.05 U1	7.1	909	1,640

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report.

- -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit.

In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report.

P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1506 Mitchell - BAP **Appendix IV Constituents**

Collection Date	Monitoring	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Combined Radium	Fluoride	Lead	Lithium	Mercury	Molybdenum	Selenium	Thallium
	Program	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	pCi/L	mg/L	μg/L	mg/L	μg/L	μg/L	μg/L	μg/L
6/14/2016	Background	0.07	1.65	73.0	0.053	0.04	1.1	1.31	0.488	0.07 J1	1.25	0.006	0.004 J1	0.74	0.2	0.070
8/2/2016	Background	0.05 J1	1.01	70.4	0.026	0.04	0.8	0.799	0.67	0.07 J1	0.601	0.015	0.003 J1	0.68	0.09 J1	0.060
9/27/2016	Background	0.05 J1	1.14	62.0	0.030	0.03	1.0	0.739	1.263	< 0.05 U1	0.744	0.015	0.002 J1	0.55	0.2	0.064
11/9/2016	Background	0.03 J1	0.64	57.4	0.01 J1	0.02 J1	0.959	0.251	2.196	< 0.05 U1	0.272	0.008	< 0.002 U1	0.45	0.07 J1	0.05 J1
2/8/2017	Background	0.03 J1	0.62	52.9	0.008 J1	0.02 J1	4.28	0.305	0.4008	< 0.05 U1	0.217	0.013	< 0.002 U1	1.07	< 0.03 U1	0.066
4/5/2017	Background	0.04 J1	0.81	60.1	0.021	0.02	3.87	0.891	0.438	< 0.05 U1	0.574	0.011	0.002 J1	0.49	0.08 J1	0.04 J1
5/17/2017	Background	0.05 J1	1.26	60.9	0.027	0.03	2.83	0.768	0.226	< 0.05 U1	0.726	0.016	0.002 J1	1.22	0.1	0.05 J1
7/19/2017	Background	0.18	0.80	54.9	0.02 J1	0.02 J1	3.15	0.932	0.889	< 0.05 U1	0.457	0.016	< 0.002 U1	1.14	< 0.06 U1	0.06 J1
4/11/2018	Assessment	0.03 J1	0.73	55.4	0.021	0.02 J1	2.01	0.476	0.592	< 0.05 U1	0.477	0.009	0.002 J1	1.23	0.1	0.05 J1
8/22/2018	Assessment	0.06	0.46	54.6	0.01 J1	0.02	2.47	0.581	1.723	0.05 J1	0.319	0.010	< 0.002 U1	0.50	0.09 J1	0.050
5/1/2019	Assessment	0.03 J1	0.34	53.5	< 0.02 U1	0.02 J1	0.752	0.256	0.1879	0.03 J1	0.135	0.02 J1	< 0.002 U1	2 J1	0.07 J1	< 0.1 U1
6/11/2019	Assessment	0.03 J1	0.42	49.8	< 0.02 U1	0.01 J1	1.11	0.290	1.009	0.05 J1	0.234	< 0.009 U1	< 0.002 U1	0.4 J1	0.04 J1	< 0.1 U1
10/22/2019	Assessment	0.03 J1	0.37	52.7	< 0.02 U1	0.02 J1	0.708	0.167	0.997	0.04 J1	0.1 J1	0.00873	< 0.002 U1	2 J1	0.04 J1	< 0.1 U1
3/17/2020	Assessment	< 0.02 U1	0.44	53.0	< 0.02 U1	0.01 J1	4.24	0.393	< 0.680 U1	0.04 J1	0.213	0.00825	< 0.002 U1	1 J1	0.09 J1	< 0.1 U1
5/5/2020	Assessment	0.02 J1	0.33	52.2	< 0.02 U1	0.01 J1	0.592	0.162	0.478	0.03 J1	0.2 J1	0.00782	< 0.002 U1	0.7 J1	< 0.03 U1	< 0.1 U1
10/20/2020	Assessment	0.02 J1	0.30	47.7	< 0.02 U1	0.02 J1	0.407	0.119	0.5997	0.04 J1	0.1 J1	0.00774	< 0.002 U1	2.05	< 0.03 U1	< 0.1 U1
3/16/2021	Assessment	0.03 J1	0.33	49.9	0.009 J1	0.02 J1	0.680	0.512	0.612	0.06 J1	0.1 J1	0.00783	< 0.002 U1	0.7 J1	< 0.09 U1	< 0.04 U1
5/11/2021	Assessment	0.03 J1	0.38	51.9	0.009 J1	0.02 J1	0.591	0.357	0.4573	0.06	0.2 J1	0.00771	< 0.002 U1	0.7 J1	< 0.09 U1	0.05 J1
10/19/2021	Assessment	0.03 J1	0.27	44.7	< 0.007 U1	0.022	0.55	0.465	1.42	0.04 J1	0.13 J1	0.00735	< 0.002 U1	1	0.10 J1	0.06 J1
3/15/2022	Assessment	0.03 J1	0.34	41.2	0.012 J1	0.014 J1	0.73	0.344	1.22	0.04 J1	0.14 J1	0.00753	< 0.002 U1	1.3	0.13 J1	< 0.04 U1
5/10/2022	Assessment	0.02 J1	0.31	42.5	< 0.007 U1	0.012 J1	0.42	0.183	0.99	< 0.05 U1	0.08 J1	0.00764	< 0.002 U1	0.4 J1	1.51	< 0.04 U1
10/17/2022	Assessment	0.03 J1	0.38	38.3	0.007 J1	0.011 J1	0.39	0.154	0.59	< 0.05 U1	0.19 J1	0.00814	0.004 J1	0.3 J1	2.30	0.04 J1

Notes:

 μ g/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report. - -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit. In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report. P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1507 Mitchell - BAP Appendix III Constituents

Collection Date	Monitoring Program	Boron	Calcium	Chloride	Fluoride	рН	Sulfate	Total Dissolved Solids
		mg/L	mg/L	mg/L	mg/L	SU	mg/L	mg/L
6/14/2016	Background	13.2	333	529	0.06 J1	7.0	339	1,070
8/2/2016	Background	12.2	323	497	0.07 J1	7.0	332	1,890
9/27/2016	Background	14.1	355	517	0.06 J1	7.1	345	1,840
11/9/2016	Background	12.1	325	480	0.06 J1	7.1	314	1,840
2/8/2017	Background	11.1	312	401	0.06 J1	7.1	276	1,480
4/5/2017	Background	10.6	324	445	0.05 J1	7.2	306	1,630
5/17/2017	Background	12.1	308	437	0.05 J1	7.2	310	1,680
7/19/2017	Background	11.1	298	447	< 0.05 U1	7.2	308	1,740
10/10/2017	Detection	10.7	289	430	0.06 J1	7.2	316	1,660
12/27/2017	Detection	10.4	284	450		7.2		1,380
4/11/2018	Assessment	10.4	296	400	0.06 J1	6.9	347	1,390
8/21/2018	Assessment	9.29	272	331	0.07	7.2	323	1,430
5/1/2019	Assessment	8.36	271	296	0.07	8.0	346	1,270
6/11/2019	Assessment	8.41	257	279	0.07	7.8	349	1,340
10/22/2019	Assessment	8.39	273	295	0.08	7.4	369	1,360
3/18/2020	Assessment				0.07	7.2		
5/5/2020	Assessment	7.72	262	310	0.05 J1	7.4	350	1,330
10/21/2020	Assessment	7.12	229	242	0.07	7.4	420	1,300
3/16/2021	Assessment				0.09	7.7		
5/11/2021	Assessment	7.12	252	274	0.08	7.5	387	1,300
10/19/2021	Assessment	7.28	255	262	0.07	7.2	378	1,320
3/15/2022	Assessment				0.04 J1	7.3		
5/10/2022	Assessment	4.08	251	169	0.05 J1	8.3	671	1,500 L1
10/17/2022	Assessment	9.07	360	288	< 0.05 U1	7.0	1,040	1,900

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report.

- -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit.

In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report.

P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1507 Mitchell - BAP **Appendix IV Constituents**

Collection Date	Monitoring	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Combined Radium	Fluoride	Lead	Lithium	Mercury	Molybdenum	Selenium	Thallium
	Program	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	pCi/L	mg/L	μg/L	mg/L	μg/L	μg/L	μg/L	μg/L
6/14/2016	Background	0.05 J1	2.19	84.5	0.142	0.07	3.6	3.18	0.521	0.06 J1	4.07	0.011	0.025	0.25	0.7	0.051
8/2/2016	Background	0.12	4.54	104	0.168	0.07	10.4	4.10	2.09	0.07 J1	4.48	0.019	0.016	2.14	0.5	0.078
9/27/2016	Background	0.10	3.58	92.0	0.134	0.06	14.0	3.06	2.029	0.06 J1	2.96	0.020	0.010	1.80	0.5	0.08 J1
11/9/2016	Background	0.11	4.15	102	0.202	0.07	12.6	4.50	1.784	0.06 J1	3.97	0.016	0.010	12.8	0.5	0.09 J1
2/8/2017	Background	0.08	2.16	73.6	0.089	0.04	6.16	1.77	16.587	0.06 J1	1.86	0.013	0.007	2.31	0.3	0.081
4/5/2017	Background	0.06	1.51	71.3	0.053	0.04	19.4	1.26	0.600	0.05 J1	1.17	0.011	0.006	5.29	0.2	0.053
5/17/2017	Background	0.11	1.30	63.6	0.031	0.04	12.6	0.990	0.767	0.05 J1	0.799	0.024	0.003 J1	4.54	0.2	0.04 J1
7/19/2017	Background	0.06 J1	1.29	62.0	0.044	0.04	12.1	2.37	1.215	< 0.05 U1	0.999	0.018	0.004 J1	4.37	0.1 J1	0.06 J1
4/11/2018	Assessment	0.07	1.67	71.2	0.062	0.04	21.3	1.45	0.701	0.06 J1	1.56	0.012	0.006	2.73	0.3	0.059
8/21/2018	Assessment	0.08	0.47	62.1	0.01 J1	0.03	2.00	0.426	1.419	0.07	0.308	0.010	0.002 J1	0.87	0.08 J1	0.05 J1
5/1/2019	Assessment	0.03 J1	0.43	53.9	< 0.02 U1	0.03 J1	2.35	0.331	0.496	0.07	0.239	< 0.009 U1	< 0.002 U1	1 J1	0.07 J1	< 0.1 U1
6/11/2019	Assessment	0.03 J1	0.24	52.2	< 0.02 U1	0.03 J1	0.315	0.160	1.454	0.07	< 0.02 U1	0.01 J1	0.003 J1	0.4 J1	0.04 J1	< 0.1 U1
10/22/2019	Assessment	0.03 J1	0.45	54.8	< 0.02 U1	0.03 J1	1.51	0.343	0.952	0.08	0.239	0.00814	0.003 J1	< 0.4 U1	0.08 J1	< 0.1 U1
3/18/2020	Assessment	< 0.02 U1	0.44	53.0	< 0.02 U1	0.03 J1	2.69	0.342	0.381	0.07	0.217	0.00794	< 0.002 U1	0.8 J1	0.06 J1	< 0.1 U1
5/5/2020	Assessment	0.03 J1	0.42	53.1	< 0.02 U1	0.03 J1	1.30	0.345	0.836	0.05 J1	0.208	0.00757	< 0.002 U1	0.7 J1	0.08 J1	< 0.1 U1
10/21/2020	Assessment	0.03 J1	0.41	48.3	< 0.02 U1	0.04 J1	0.857	0.347	0.0979	0.07	0.201	0.00799	< 0.002 U1	0.7 J1	0.05 J1	< 0.1 U1
3/16/2021	Assessment	0.03 J1	0.44	53.5	0.02 J1	0.02 J1	1.91	0.384	0.5512	0.09	0.232	0.00710	< 0.002 U1	1 J1	< 0.09 U1	< 0.04 U1
5/11/2021	Assessment	0.03 J1	0.42	54.4	0.01 J1	0.03 J1	1.71	0.360	0.506	0.08	0.225	0.00739	< 0.002 U1	0.9 J1	< 0.09 U1	0.04 J1
10/19/2021	Assessment	0.04 J1	0.37	45.5	0.009 J1	0.035	2.31	0.845	1.24	0.07	0.23	0.00784	< 0.002 U1	0.7	< 0.09 U1	< 0.04 U1
3/15/2022	Assessment	0.03 J1	0.31	44.0	0.011 J1	0.026	1.49	0.357	1.19	0.04 J1	0.10 J1	0.00842	< 0.002 U1	0.8	< 0.09 U1	0.04 J1
5/10/2022	Assessment	0.03 J1	0.49	45.0	0.012 J1	0.022	1.48	0.330	1.31	0.05 J1	0.24	0.00831	< 0.002 U1	0.8	4.44	< 0.04 U1
10/17/2022	Assessment	0.03 J1	0.32	45.1	< 0.007 U1	0.034	0.75	0.102	1.15	< 0.05 U1	< 0.05 U1	0.00889	0.004 J1	0.4 J1	0.28 J1	0.07 J1

Notes:

 μ g/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report. - -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit. In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report. P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1508 Mitchell - BAP Appendix III Constituents

Collection Date	Monitoring Program	Boron	Calcium	Chloride	Fluoride	рН	Sulfate	Total Dissolved Solids
		mg/L	mg/L	mg/L	mg/L	SU	mg/L	mg/L
6/14/2016	Background	0.509	204	211	0.1 J1	6.9	291	1,060
8/1/2016	Background	0.690	218	237	0.1 J1	7.0	302	1,100
9/26/2016	Background	1.03	215	238	0.1 J1	7.0	304	1,110
11/8/2016	Background	1.36	234	227	0.08 J1	7.2	304	1,140
2/8/2017	Background	1.04	236	220	0.08 J1	7.1	301	1,070
4/5/2017	Background	0.780	228	215	0.08 J1	7.2	311	1,070
5/16/2017	Background	0.846	218	208	0.07 J1	7.1	296	1,130
7/18/2017	Background	1.00	224	214	0.06 J1	7.1	305	1,110
10/9/2017	Detection	0.881	207	212	0.08 J1	7.1	322	1,200
4/11/2018	Assessment	0.806	229	200	0.08	6.9	302	1,050
8/21/2018	Assessment	0.952	219	204	0.08	7.2	313	1,080
5/1/2019	Assessment	0.622	221	178	0.08	8.2	287	978
6/12/2019	Assessment	0.679	209	163	0.08	7.1	285	988
10/22/2019	Assessment	0.860	212	168	0.09	7.3	309	991
3/18/2020	Assessment				0.08	7.2		
5/6/2020	Assessment	0.486	198	148	0.06	7.2	273	947
10/20/2020	Assessment	0.962	201		0.08	7.1		982
1/7/2021	Assessment			161			286	
3/17/2021	Assessment				0.09	7.5		
5/12/2021	Assessment	0.454	205	156	0.09	7.6	281	974
10/20/2021	Assessment	0.439	195	157	0.09	7.4	283	940
3/15/2022	Assessment				0.09	7.0		
5/11/2022	Assessment	0.215	245	147	0.06 J1	7.6	335	980
10/17/2022	Assessment	4.06	248	191	0.06 J1	7.0	734	1,360

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report.

- -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit.

In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report.

P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1508 Mitchell - BAP **Appendix IV Constituents**

Collection Date	Monitoring	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Combined Radium	Fluoride	Lead	Lithium	Mercury	Molybdenum	Selenium	Thallium
	Program	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	pCi/L	mg/L	μg/L	mg/L	μg/L	μg/L	μg/L	μg/L
6/14/2016	Background	0.04 J1	1.05	48.7	0.038	0.09	0.8	3.21	0.763	0.1 J1	1.61	0.009	0.003 J1	0.93	0.5	0.04 J1
8/1/2016	Background	0.04 J1	1.07	51.7	0.037	0.07	1.2	2.22	0.0803	0.1 J1	1.34	< 0.0002 U1	0.008	0.74	0.7	0.03 J1
9/26/2016	Background	0.06 J1	1.65	50.2	0.06 J1	0.07 J1	2.3	2.34	0.596	0.1 J1	1.69	0.007	0.003 J1	1.17	0.8	< 0.05 U1
11/8/2016	Background	0.05 J1	1.32	53.9	0.058	0.05	1.70	2.17	2.782	0.08 J1	2.06	0.003	0.002 J1	0.63	0.7	0.03 J1
2/8/2017	Background	0.04 J1	0.97	46.1	0.042	0.04	1.34	1.40	12.465	0.08 J1	1.32	0.009	0.003 J1	0.53	0.7	0.04 J1
4/5/2017	Background	0.04 J1	1.09	49.9	0.049	0.04	1.74	1.66	0.394	0.08 J1	1.71	0.008	0.004 J1	0.35	0.9	0.03 J1
5/16/2017	Background	0.04 J1	1.21	47.0	0.041	0.03	1.32	1.12	0.931	0.07 J1	1.13	0.014	< 0.002 U1	0.46	0.9	0.04 J1
7/18/2017	Background	0.04 J1	1.11	45.1	0.040	0.04	1.33	1.27	0.597	0.06 J1	1.20	0.012	< 0.002 U1	0.68	0.6	0.04 J1
4/11/2018	Assessment	0.04 J1	1.04	46.4	0.040	0.04	1.40	1.03	0.236	0.08	1.11	0.008	< 0.004 U1	0.45	0.7	0.05 J1
8/21/2018	Assessment	0.06	0.44	40.1	0.01 J1	0.04	0.691	0.678	0.3152	0.08	0.384	0.007	< 0.002 U1	0.25	0.4	0.03 J1
5/1/2019	Assessment	0.03 J1	0.60	37.4	0.02 J1	0.03 J1	0.735	0.637	0.636	0.08	0.540	< 0.009 U1	< 0.002 U1	< 0.4 U1	0.3	< 0.1 U1
6/12/2019	Assessment	< 0.02 U1	0.41	35.2	< 0.02 U1	0.03 J1	0.590	0.419	0.295	0.08	0.336	< 0.009 U1	< 0.002 U1	< 0.4 U1	0.2	< 0.1 U1
10/22/2019	Assessment	0.05 J1	0.35	34.8	< 0.02 U1	0.03 J1	1.20	0.521	1.491	0.09	0.2 J1	0.00485	< 0.002 U1	0.6 J1	0.3	< 0.1 U1
3/18/2020	Assessment	< 0.02 U1	0.52	36.2	< 0.02 U1	0.03 J1	0.820	0.481	0.636	0.08	0.298	0.00484	< 0.002 U1	0.8 J1	0.1 J1	< 0.1 U1
5/6/2020	Assessment	< 0.02 U1	0.44	35.4	< 0.02 U1	0.03 J1	0.654	0.413	0.5934	0.06	0.311	0.00483	< 0.002 U1	0.7 J1	0.1 J1	< 0.1 U1
10/20/2020	Assessment	< 0.02 U1	0.29	31.4	< 0.02 U1	0.02 J1	0.336	0.114	0.01901	0.08	0.05 J1	0.00416	< 0.002 U1	< 0.4 U1	0.2 J1	< 0.1 U1
3/17/2021	Assessment	< 0.02 U1	0.36	34.0	0.01 J1	0.04 J1	0.661	0.242	0.3413	0.09	0.233	0.00475	< 0.002 U1	0.4 J1	0.2 J1	< 0.04 U1
5/12/2021	Assessment	< 0.02 U1	0.39	36.4	< 0.007 U1	0.04 J1	0.511	0.261	1.083	0.09	0.217	0.00458	< 0.002 U1	1 J1	0.2 J1	< 0.04 U1
10/20/2021	Assessment	< 0.02 U1	0.30	29.6	< 0.007 U1	0.037	0.53	0.244	0.17	0.09	0.14 J1	0.00423	< 0.002 U1	0.4 J1	0.15 J1	< 0.04 U1
3/15/2022	Assessment	< 0.02 U1	0.30	28.7	< 0.007 U1	0.038	0.31	0.219	0.70	0.09	< 0.05 U1	0.00421	< 0.002 U1	0.3 J1	0.1 J1	< 0.04 U1
5/11/2022	Assessment	< 0.02 U1	0.28	30.7	< 0.007 U1	0.026	0.31	0.162	0.85	0.06 J1	< 0.05 U1	0.00432	< 0.002 U1	0.3 J1	0.83	< 0.04 U1
10/17/2022	Assessment	< 0.02 U1	0.28	28.6	< 0.007 U1	0.022	0.59	0.147	0.86	0.06 J1	0.06 J1	0.00473	< 0.002 U1	0.2 J1	3.34	< 0.04 U1

Notes:

 μ g/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report. - -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit. In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report. P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1509 Mitchell - BAP Appendix III Constituents

Collection Date	Monitoring Program	Boron	Calcium	Chloride	Fluoride	рН	Sulfate	Total Dissolved Solids
		mg/L	mg/L	mg/L	mg/L	SU	mg/L	mg/L
6/14/2016	Background	12.4	280	435	0.16	7.0	380	1,730
8/9/2016	Background	11.6	292	401	0.16	7.1	388	1,670
9/27/2016	Background	10.6	292	371	0.1 J1	7.1	418	1,540
11/8/2016	Background	8.29	258	333	0.1 J1	7.1	400	1,410
2/7/2017	Background	7.65	280	360	0.15	7.1	416	1,450
4/5/2017	Background	6.22	290	358	0.1 J1	7.2	416	1,560
5/17/2017	Background	7.36	284	354	0.1 J1	7.2	420	1,520
7/19/2017	Background	6.54	279	346	0.1 J1	7.2	418	1,560
10/10/2017	Detection	6.70	277	345	0.1 J1	7.2	432	1,490
12/27/2017	Detection	6.31	271	315		7.1		1,360
4/11/2018	Assessment	6.81	272	324	0.15	6.9	488	1,390
8/21/2018	Assessment	6.97	279	323	0.14	7.2	465	1,540
5/1/2019	Assessment	8.73	287	328	0.13	8.5	429	1,480
6/11/2019	Assessment	8.37	273	311	0.13	7.8	432	1,410
10/22/2019	Assessment	8.02	273	297	0.15	7.3	468	1,420
3/18/2020	Assessment				0.13	7.3		
5/5/2020	Assessment	10.6	262	331	0.10	7.4	402	1,390
10/21/2020	Assessment	7.97	237	291	0.14	7.3	463	1,360
3/16/2021	Assessment				0.16	7.9		
5/11/2021	Assessment	7.29	239	230	0.15	7.6	447	1,310
10/19/2021	Assessment	7.37	234	238	0.15	7.2	413	1,260
3/15/2022	Assessment				0.09	7.3		
5/10/2022	Assessment	8.95	240	267	0.09 J1	8.4	456	1,270 S7, L1
10/17/2022	Assessment	6.99	279	251	0.06 J1	7.2	918	1,730

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report.

- -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit.

In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report.

P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1509 Mitchell - BAP **Appendix IV Constituents**

Collection Date	Monitoring	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Combined Radium	Fluoride	Lead	Lithium	Mercury	Molybdenum	Selenium	Thallium
	Program	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	pCi/L	mg/L	μg/L	mg/L	μg/L	μg/L	μg/L	μg/L
6/14/2016	Background	0.03 J1	0.55	64.4	0.008 J1	0.03	2.5	0.514	0.816	0.16	0.102	0.0009 J1	< 0.002 U1	1.43	0.1	0.03 J1
8/9/2016	Background	0.03 J1	0.62	64.4	0.01 J1	0.02	0.5	0.484	0.45569	0.16	0.251	0.015	< 0.002 U1	1.00	0.1	0.03 J1
9/27/2016	Background	0.03 J1	0.39	61.0	< 0.005 U1	0.02	4.6	0.424	2.664	0.1 J1	0.024	0.018	< 0.002 U1	1.07	0.2	0.04 J1
11/8/2016	Background	0.03 J1	0.40	62.0	< 0.005 U1	0.02	0.627	0.253	0.413	0.1 J1	0.006 J1	0.012	< 0.002 U1	0.59	0.1	0.05 J1
2/7/2017	Background	0.03 J1	0.50	56.7	< 0.005 U1	0.02	0.650	0.130	1.399	0.15	0.056	0.011	< 0.002 U1	0.66	0.09 J1	0.04 J1
4/5/2017	Background	0.02 J1	0.33	63.5	< 0.005 U1	0.02 J1	1.15	0.189	0.304	0.1 J1	0.01 J1	0.012	< 0.002 U1	0.48	0.2	0.03 J1
5/17/2017	Background	0.02 J1	0.56	61.5	< 0.004 U1	0.01 J1	1.05	0.255	1.673	0.1 J1	0.02 J1	0.022	0.002 J1	0.56	0.2	0.03 J1
7/19/2017	Background	0.03 J1	0.65	58.5	0.01 J1	0.01 J1	0.857	0.344	1.134	0.1 J1	0.220	0.017	< 0.002 U1	0.80	0.2 J1	0.04 J1
4/11/2018	Assessment	0.03 J1	0.42	52.8	0.005 J1	0.01 J1	0.657	0.215	0.792	0.15	0.062	0.009	0.002 J1	0.34	0.2	0.057
8/21/2018	Assessment	0.09	0.33	53.8	< 0.004 U1	0.008 J1	0.777	0.132	0.736	0.14	0.035	0.012	< 0.002 U1	0.32	0.3	0.03 J1
5/1/2019	Assessment	0.03 J1	0.33	47.2	< 0.02 U1	0.01 J1	2.28	0.324	0.4075	0.13	0.114	< 0.009 U1	< 0.002 U1	< 0.4 U1	0.2 J1	< 0.1 U1
6/11/2019	Assessment	0.03 J1	0.28	48.6	< 0.02 U1	0.02 J1	1.47	0.097	0.559	0.13	0.05 J1	0.02 J1	< 0.002 U1	< 0.4 U1	0.2	< 0.1 U1
10/22/2019	Assessment	0.03 J1	0.37	47.2	< 0.02 U1	0.01 J1	1.22	0.164	1.441	0.15	0.08 J1	0.00911	< 0.002 U1	< 0.4 U1	0.3	< 0.1 U1
3/18/2020	Assessment	< 0.02 U1	0.42	45.8	< 0.02 U1	< 0.01 U1	0.518	0.144	0.5514	0.13	0.2 J1	0.00934	< 0.002 U1	< 0.4 U1	0.07 J1	< 0.1 U1
5/5/2020	Assessment	0.03 J1	0.27	43.7	< 0.02 U1	< 0.01 U1	0.633	0.092	1.2019	0.10	0.05 J1	0.00897	< 0.002 U1	0.6 J1	0.1 J1	< 0.1 U1
10/21/2020	Assessment	0.03 J1	0.35	45.9	< 0.02 U1	< 0.01 U1	0.698	0.115	1.6015	0.14	0.09 J1	0.00809	< 0.002 U1	< 0.4 U1	0.3	< 0.1 U1
3/16/2021	Assessment	0.03 J1	0.30	43.8	0.01 J1	0.009 J1	0.552	0.099	0.33	0.16	0.1 J1	0.00749	< 0.002 U1	0.3 J1	0.6	< 0.04 U1
5/11/2021	Assessment	0.03 J1	0.37	45.0	0.009 J1	0.01 J1	0.492	0.143	0.56	0.15	0.2 J1	0.00732	< 0.002 U1	0.3 J1	0.7	< 0.04 U1
10/19/2021	Assessment	0.03 J1	0.33	37.3	< 0.007 U1	0.012 J1	0.61	0.261	1.32	0.15	0.20	0.00763	0.002 J1	0.3 J1	0.24 J1	< 0.04 U1
3/15/2022	Assessment	0.03 J1	0.45	43.3	0.021 J1	0.014 J1	0.70	0.422	1.48	0.09	0.24	0.0101	0.002 J1	0.6	< 0.09 U1	< 0.04 U1
5/10/2022	Assessment	0.02 J1	0.31	36.7	< 0.007 U1	0.009 J1	0.34	0.129	0.47	0.09 J1	0.09 J1	0.00952	< 0.002 U1	2.2	1.03	< 0.04 U1
10/17/2022	Assessment	0.03 J1	0.54	44.3	0.014 J1	0.011 J1	0.52	0.279	0.54	0.06 J1	0.29	0.00987	0.006	0.2 J1	1.10	< 0.04 U1

Notes:

 μ g/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report. - -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit. In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report. P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1510 Mitchell - BAP Appendix III Constituents

Collection Date	Monitoring Program	Boron	Calcium	Chloride	Fluoride	рН	Sulfate	Total Dissolved Solids
		mg/L	mg/L	mg/L	mg/L	SU	mg/L	mg/L
6/14/2016	Background	9.36	283	334	0.06 J1	7.0	358	1,520
8/2/2016	Background	9.18	294	333	0.06 J1	7.0	356	1,410
9/27/2016	Background	10.1	296	338	0.05 J1	7.1	367	1,410
11/9/2016	Background	9.22	280	325	< 0.05 U1	7.1	332	1,420
2/8/2017	Background	10.4	281	314	0.06 J1	7.2	325	1,270
4/5/2017	Background	9.23	261	303	0.06 J1	7.3	313	1,330
5/17/2017	Background	10.8	249	306	0.05 J1	7.2	307	1,340
7/18/2017	Background	9.86	255	311	< 0.05 U1	7.2	309	1,410
10/9/2017	Detection	8.70	249	327	0.05 J1	7.2	356	1,520
12/27/2017	Detection	8.83	261	339		7.2		1,300
4/12/2018	Assessment	10.4	292	322	< 0.05 U1	7.0	398	1,290
8/21/2018	Assessment	9.13	268	334	0.09	7.3	428	1,550
5/1/2019	Assessment	8.83	287	325	0.10	8.1	467	1,460
6/12/2019	Assessment	8.50	266	293	0.10	6.9	469	1,430
10/22/2019	Assessment	9.30	259	283	0.11	7.2	483	1,360
3/18/2020	Assessment				0.11	7.4		
5/6/2020	Assessment	9.14	228	252	0.10	7.4	484	1,440
10/20/2020	Assessment	8.38	197		0.11	7.4		1,280
1/7/2021	Assessment			229			441	
3/17/2021	Assessment				0.13	7.6		
5/12/2021	Assessment	7.52	180	226	0.13	7.4	405	1,220
10/20/2021	Assessment	7.70	186	215	0.13	7.3	409	1,250
3/15/2022	Assessment				0.13	7.3		
5/11/2022	Assessment	5.04	163	175	0.1 J1	7.7	354	1,010
10/17/2022	Assessment	6.50	195	165	0.09 J1	7.2	612	1,450

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report.

- -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit.

In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report.

P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1 - Groundwater Data Summary: MW-1510 Mitchell - BAP **Appendix IV Constituents**

Collection Date	Monitoring	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Combined Radium	Fluoride	Lead	Lithium	Mercury	Molybdenum	Selenium	Thallium
	Program	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	pCi/L	mg/L	μg/L	mg/L	μg/L	μg/L	μg/L	μg/L
6/14/2016	Background	0.03 J1	0.72	50.8	0.02 J1	0.01 J1	0.6	0.257	0.331	0.06 J1	0.282	0.003	< 0.002 U1	0.65	0.2	0.057
8/2/2016	Background	0.03 J1	0.62	49.0	0.02 J1	0.009 J1	0.7	0.256	1.383	0.06 J1	0.269	0.016	< 0.002 U1	0.92	0.2	0.02 J1
9/27/2016	Background	0.03 J1	0.70	48.7	0.02 J1	0.009 J1	0.8	0.329	0.865	0.05 J1	0.333	0.014	< 0.002 U1	0.45	0.2	0.04 J1
11/9/2016	Background	0.02 J1	0.58	44.6	0.02 J1	0.01 J1	0.655	0.230	0.88	< 0.05 U1	0.261	0.009	< 0.002 U1	0.33	0.1	0.03 J1
2/8/2017	Background	0.02 J1	0.47	39.5	< 0.005 U1	0.005 J1	0.521	0.073	6.828	0.06 J1	0.066	0.013	< 0.002 U1	0.42	0.08 J1	0.02 J1
4/5/2017	Background	0.02 J1	0.36	41.4	< 0.005 U1	0.006 J1	2.34	0.175	1.12829	0.06 J1	0.094	0.011	< 0.002 U1	0.27	0.07 J1	< 0.01 U1
5/17/2017	Background	0.02 J1	0.53	40.2	< 0.004 U1	0.005 J1	1.40	0.138	0.176	0.05 J1	0.049	0.015	< 0.002 U1	0.28	0.1	0.01 J1
7/18/2017	Background	0.02 J1	0.51	41.0	0.007 J1	0.008 J1	6.41	0.234	0.97	< 0.05 U1	0.125	0.014	< 0.002 U1	0.85	0.1	0.01 J1
4/12/2018	Assessment	0.03 J1	0.42	43.3	0.01 J1	0.005 J1	27.4	0.217	0.094	< 0.05 U1	0.119	0.006	0.002 J1	3.30	0.1	0.02 J1
8/21/2018	Assessment	0.03 J1	0.37	42.6	0.008 J1	0.006 J1	5.64	0.383	1.237	0.09	0.133	0.011	< 0.002 U1	0.43	0.1	0.01 J1
5/1/2019	Assessment	0.02 J1	0.29	41.7	< 0.02 U1	< 0.01 U1	1.75	0.172	0.5725	0.10	0.105	0.01 J1	< 0.002 U1	< 0.4 U1	0.2 J1	< 0.1 U1
6/12/2019	Assessment	0.02 J1	0.27	41.3	< 0.02 U1	< 0.01 U1	0.697	0.105	0.4098	0.10	0.07 J1	0.02 J1	< 0.002 U1	< 0.4 U1	0.2 J1	< 0.1 U1
10/22/2019	Assessment	0.02 J1	0.33	38.7	< 0.02 U1	< 0.01 U1	1.12	0.154	0.333	0.11	0.07 J1	0.00862	< 0.002 U1	< 0.4 U1	0.2	< 0.1 U1
3/18/2020	Assessment	< 0.02 U1	0.31	38.0	< 0.02 U1	< 0.01 U1	2.10	0.121	0.864	0.11	0.08 J1	0.00808	< 0.002 U1	< 0.4 U1	0.2 J1	< 0.1 U1
5/6/2020	Assessment	< 0.02 U1	0.29	36.7	< 0.02 U1	< 0.01 U1	0.886	0.109	0.7374	0.10	0.07 J1	0.00750	< 0.002 U1	< 0.4 U1	0.2 J1	< 0.1 U1
10/20/2020	Assessment	0.02 J1	0.27	32.6	< 0.02 U1	< 0.01 U1	0.688	0.091	0.3002	0.11	0.06 J1	0.00675	< 0.002 U1	< 0.4 U1	0.3	< 0.1 U1
3/17/2021	Assessment	0.02 J1	0.25	30.6	0.01 J1	0.004 J1	1.04	0.098	0.5272	0.13	0.08 J1	0.00720	< 0.002 U1	0.2 J1	0.3	< 0.04 U1
5/12/2021	Assessment	0.02 J1	0.34	33.4	0.01 J1	0.005 J1	3.16	0.339	1.024	0.13	0.2 J1	0.00689	< 0.002 U1	0.5 J1	0.3 J1	< 0.04 U1
10/20/2021	Assessment	0.02 J1	0.26	29.7	< 0.007 U1	0.005 J1	0.57	0.128	0.62	0.13	0.11 J1	0.00701	< 0.002 U1	0.5	0.23 J1	< 0.04 U1
3/15/2022	Assessment	0.02 J1	0.29	26.5	0.015 J1	0.006 J1	0.73	0.127	0.60	0.13	0.12 J1	0.00687	0.003 J1	0.2 J1	0.59	< 0.04 U1
5/11/2022	Assessment	0.02 J1	0.27	25.8	< 0.007 U1	0.004 J1	0.54	0.119	0.43	0.1 J1	0.08 J1	0.00616	0.002 J1	0.2 J1	0.60	< 0.04 U1
10/17/2022	Assessment	0.03 J1	0.35	37.6	< 0.007 U1	0.005 J1	0.93	0.275	0.50	0.09 J1	0.12 J1	0.00760	0.019	0.3 J1	7.10	< 0.04 U1

Notes:

 μ g/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

<: Non-detect value. Analytes which were not detected are shown as less than the method detection limit (MDL) followed by a 'U1' flag. In analytical data prior to 5/18/2021, U1 flags were reported as U in the analytical report. - -: Not analyzed

J1: Concentration estimated. Analyte was detected between the method detection limit and the reporting limit. In analytical data prior to 5/18/2021, J1 flags were reported as J in the analytical report. P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

Table 1: Residence Time Calculation Summary Mitchell Bottom Ash Ponds

			2022	2-03	2022	2-05	202	2-10
CCR Management Unit	Monitoring Well	Well Diameter (inches)	Groundwater Velocity (ft/year)	Groundwater Residence Time (days)	Groundwater Velocity (ft/year)	Groundwater Residence Time (days)	Groundwater Velocity (ft/year)	Groundwater Residence Time (days)
	MW-1504 ^[1]	2.0	64.0	1.0	113.8	0.5	113.9	0.5
	MW-1505 ^[2]	2.0	63.1	1.0	118.2	0.5	83.4	0.7
Bottom	MW-1506 ^[2]	2.0	31.6	1.9	79.1	0.8	88.0	0.7
Ash	MW-1507 ^[2]	2.0	24.9	2.4	34.2	1.8	56.5	1.1
Pond	MW-1508 ^[3]	2.0	76.6	0.8	112.9	0.5	77.5	0.8
	MW-1509 ^[2]	2.0	50.9	1.2	70.8	0.9	93.4	0.7
	MW-1510 ^[1]	2.0	72.4	0.8	109.3	0.6	117.8	0.5

Notes:

[1] - Sidegradient Well

[2] - Downgradient Well

[3] - Upgradient Well



Monitoring Well Network

- Compliance Sampling Location
- Upgradient Sampling Location

Bottom Ash Pond

Notes - Monitoring well coordinates provided by AEP. - Site features based on information available in the Groundwater Monitoring Network Evaluation (CEC, 2016) provided by AEP.

Site Layout Bottom Ash Pond

Mitchell Power Generation Plant - Bottom Ash Pond Marshall County, West Virginia

Geosyntec [⊳]	
consultants	

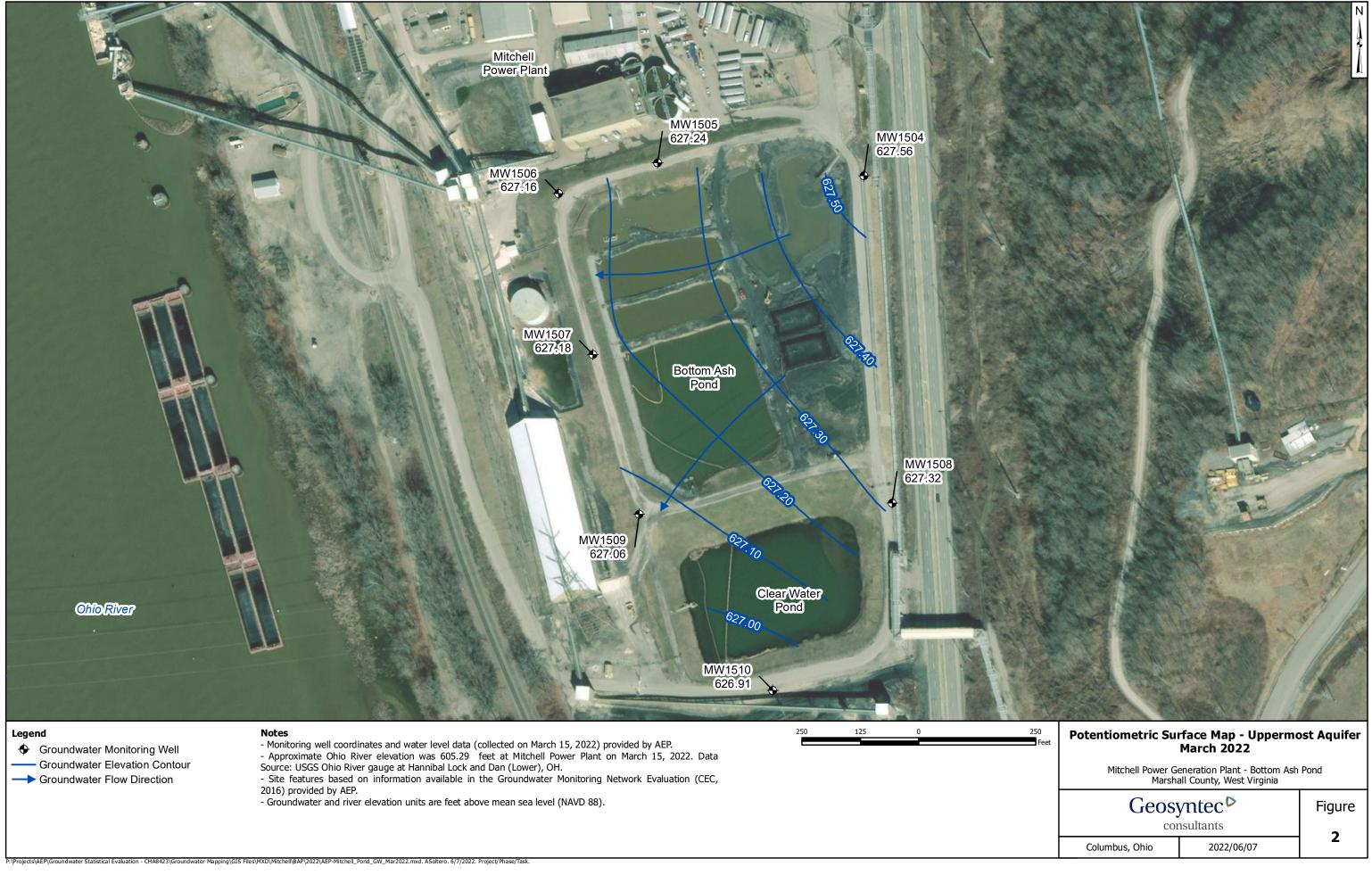
Fi	ig	u	re	ć
	.9	~		

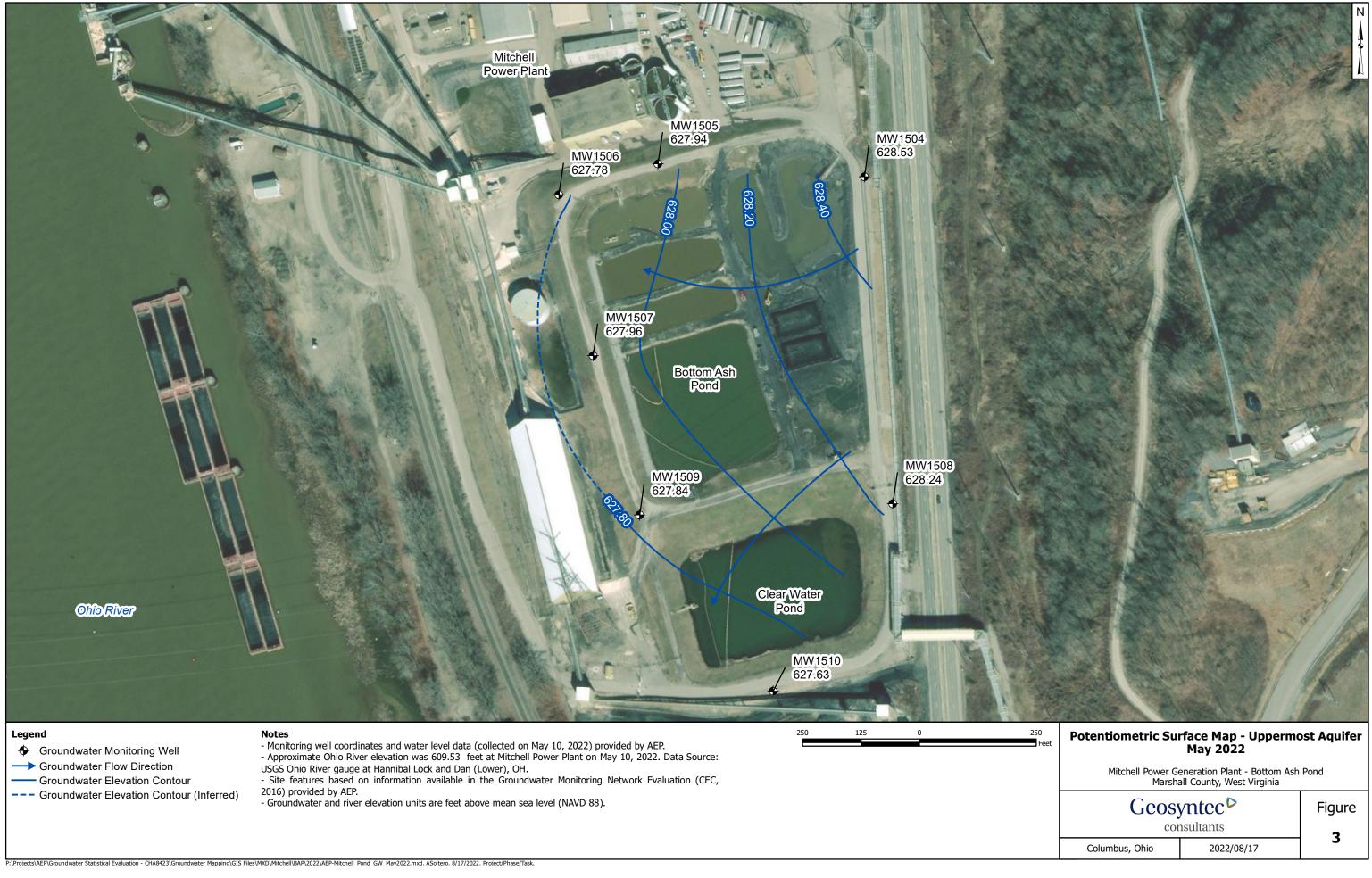
Columbus, Ohio

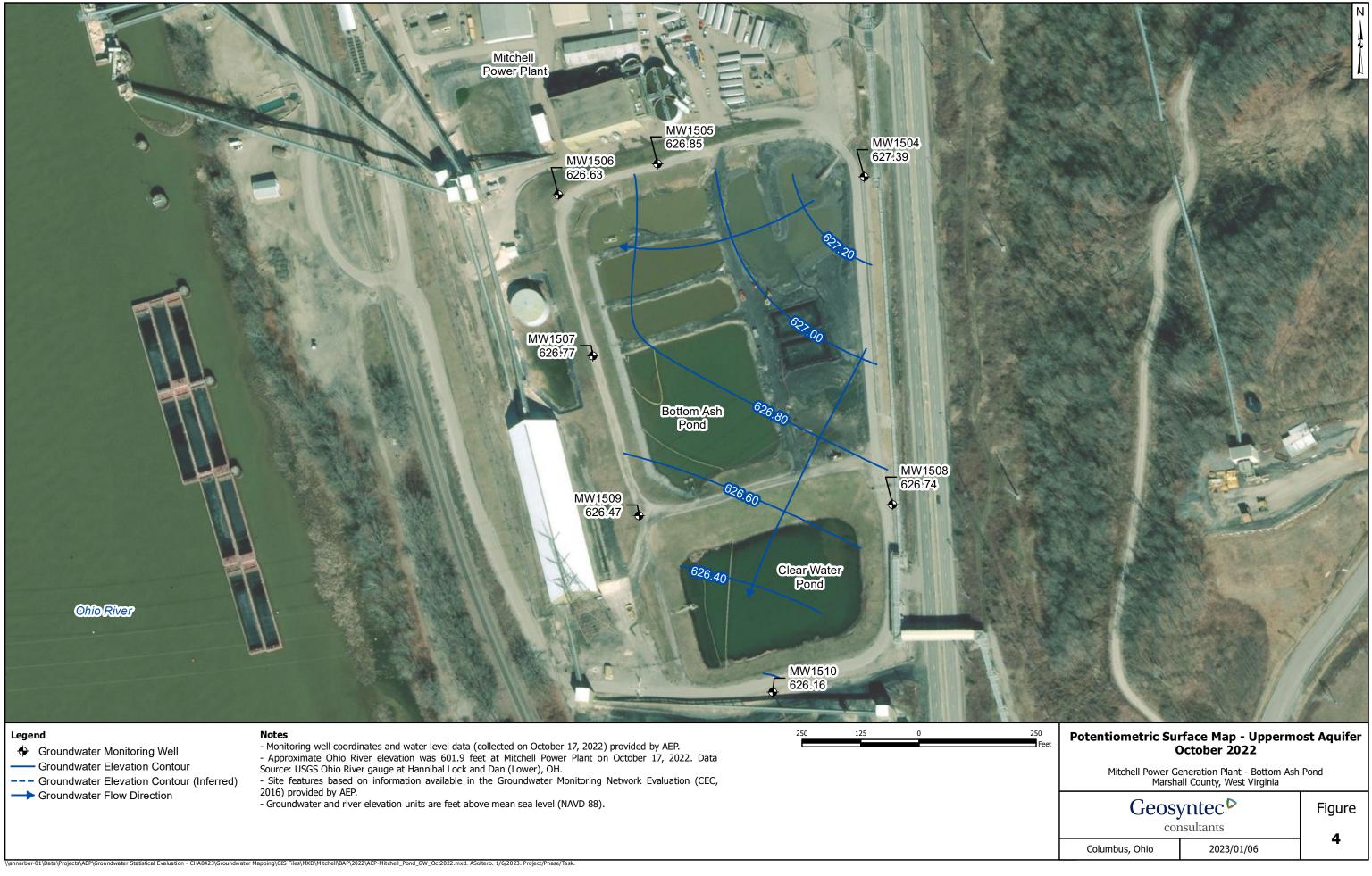
Feet

2018/01/26

1







APPENDIX 2 - Statistical Analyses

The February and August 2022 statistical analysis summaries concluding that no SSLs were identified at the CCR unit follow.

STATISTICAL ANALYSIS SUMMARY BOTTOM ASH POND Mitchell Plant Moundsville, West Virginia

Submitted to



1 Riverside Plaza Columbus, Ohio 43215-2372

Submitted by

Geosyntec Consultants

engineers | scientists | innovators

941 Chatham Lane Suite 103 Columbus, Ohio 43221

> February 14, 2022 CHA8500

TABLE OF CONTENTS

SECTION 1	Execut	ive Summary	1				
SECTION 2	2 Fly Asl	h Pond Evaluation	2-1				
2.1	Data V	Data Validation & QA/QC2					
2.2	Statisti	Statistical Analysis					
	2.2.1	Establishment of GWPSs	2-1				
	2.2.2	Evaluation of Potential Appendix IV SSLs	2-2				
	2.2.3	Establishment of Appendix III Prediction Limits	2-2				
	2.2.4	Evaluation of Potential Appendix III SSIs	2-3				
2.3	Conclu	usions	2-4				
SECTION 3	8 Referen	nces	3-1				

LIST OF TABLES

Table 1	Groundwater Data Summary
Table 2	Appendix IV Groundwater Protection Standards
Table 3	Appendix III Data Summary

LIST OF ATTACHMENTS

Attachment A	Certification by Qualified Professional Engineer
Attachment B	Statistical Analysis Output

LIST OF ACRONYMS AND ABBREVIATIONS

- AEP American Electric Power
- BAP Bottom Ash Pond
- CCR Coal Combustion Residuals
- CCV Continuing Calibration Verification
- CFR Code of Federal Regulations
- GWPS Groundwater Protection Standard
- LCL Lower Confidence Limit
- LFB Laboratory Fortified Blanks
- LPL Lower Prediction Limit
- LRB Laboratory Reagent Blanks
- MCL Maximum Contaminant Level
- NELAP National Environmental Laboratory Accreditation Program
- QA Quality Assurance
- QC Quality Control
- SSI Statistically Significant Increase
- SSL Statistically Significant Level
- TDS Total Dissolved Solids
- UPL Upper Prediction Limit
- USEPA United States Environmental Protection Agency
- UTL Upper Tolerance Limit

SECTION 1

EXECUTIVE SUMMARY

In accordance with the United States Environmental Protection Agency's (USEPA's) regulations regarding the disposal of coal combustion residuals (CCR) in landfills and surface impoundments (40 CFR 257.90-257.98, "CCR rule"), groundwater monitoring has been conducted at the Bottom Ash Pond (BAP), an existing CCR unit at the Mitchell Power Plant located in Moundsville, West Virginia. Recent groundwater monitoring results were compared to site-specific groundwater protection standards (GWPSs) to identify potential exceedances.

Based on detection monitoring conducted in 2017 and 2018, statistically significant increases (SSIs) over background were concluded for boron, calcium, chloride, and total dissolved solids (TDS) at the BAP. An alternative source was not identified following the detection monitoring events; thus, the BAP has been in assessment monitoring since 2018. GWPSs were set in accordance with 40 CFR 257.95(d)(2) and a statistical evaluation of the assessment monitoring data was conducted. During 2021, an annual sampling event for Appendix IV parameters required by 257.95(b) was completed in March, and semiannual sampling events for both Appendix III parameters and Appendix IV parameters, as required by 257.95(d)(1), were completed in May and October. During the March and May 2021 assessment monitoring events, no statistically significant levels (SSLs) were identified (Geosyntec, 2021). Concentrations of Appendix III parameters were observed above background; thus, the unit remained in assessment monitoring. One assessment monitoring event was conducted at the BAP in October 2021 in accordance with 40 CFR 257.95. The results of this assessment event are documented in this report.

Prior to conducting the statistical analyses, the groundwater data underwent several validation tests, including those for completeness, sample tracking accuracy, transcription errors, and consistent use of measurement units. No data quality issues were identified which would impact data usability.

The monitoring data were submitted to Groundwater Stats Consulting, LLC for statistical analysis. GWPSs were established for the Appendix IV parameters. Confidence intervals were calculated for Appendix IV parameters at the compliance wells to assess whether SSLs of Appendix IV parameters were present above the GWPS. No SSLs were identified for Mitchell BAP; however, concentrations of Appendix III parameters were observed above background. Thus, the unit will remain in assessment monitoring. Certification of the selected statistical methods by a qualified professional engineer is documented in Attachment A.

SECTION 2

FLY ASH POND EVALUATION

2.1 <u>Data Validation & QA/QC</u>

During the assessment monitoring program, one set of samples was collected for analysis from the upgradient and downgradient wells to meet the requirements of 257.95(d)(1) in October 2021. Samples from October 2021 were analyzed for all Appendix IV and Appendix III parameters. A summary of data collected during this assessment monitoring event is presented in Table 1.

Chemical analysis was completed by an analytical laboratory certified by the National Environmental Laboratory Accreditation Program (NELAP). Quality assurance and quality control (QA/QC) samples completed by the analytical laboratory included the use of laboratory reagent blanks (LRBs), continuing calibration verification (CCV) samples, and laboratory fortified blanks (LFBs).

The analytical data were imported into a Microsoft Access database, where checks were completed to assess the accuracy of sample location identification and analyte identification. Where necessary, unit conversions were applied to standardize reported units across all sampling events. Exported data files were created for use with the SanitasTM v.9.6.32 statistics software. The export file was checked against the analytical data for transcription errors and completeness. No QA/QC issues were noted which would impact data usability.

2.2 <u>Statistical Analysis</u>

Statistical analyses for the BAP were conducted in accordance with the October 2020 *Statistical Analysis Plan* (Geosyntec, 2020b). Time series plots and results for all completed statistical tests are provided in Attachment B.

The data obtained in October 2021 were screened for potential outliers. No outliers were identified for this event.

2.2.1 Establishment of GWPSs

A GWPS was established for each Appendix IV parameter in accordance with 40 CFR 257.95(h) and the *Statistical Analysis Plan* (Geosyntec, 2020b). The established GWPS was determined to be the greater value of the background concentration and the maximum contaminant level (MCL) or risk-based level specified in 40 CFR 257.95(h)(2) for each Appendix IV parameter. To determine background concentrations, an upper tolerance limit (UTL) was calculated using pooled data from the background wells collected during the background monitoring and assessment monitoring events. Tolerance limits were calculated parametrically with 95% coverage and 95% confidence for barium, chromium, cobalt, combined radium, lead, molybdenum, and selenium. Non-parametric tolerance limits were calculated for antimony, arsenic, cadmium, fluoride, lithium,

and thallium due to apparent non-normal distributions and for beryllium and mercury due to a high non-detect frequency. Tolerance limits and the final GWPSs are summarized in Table 2.

2.2.2 Evaluation of Potential Appendix IV SSLs

A confidence interval was constructed for each Appendix IV parameter at each compliance well. Confidence limits were generally calculated parametrically ($\alpha = 0.01$); however, non-parametric confidence limits were calculated in some cases (e.g., when the data did not appear to be normally distributed or when the non-detect frequency was too high). An SSL was concluded if the lower confidence limit (LCL) exceeded the GWPS (i.e., if the entire confidence interval exceeded the GWPS). Calculated confidence limits are shown in Attachment B.

No SSLs were identified at the Mitchell BAP.

2.2.3 Establishment of Appendix III Prediction Limits

Upper prediction limits (UPLs) were previously established for all Appendix III parameters following the background monitoring period (Geosyntec, 2018). Intrawell tests were used to evaluate potential SSIs for fluoride and sulfate, whereas interwell tests were used to evaluate potential SSIs for boron, calcium, chloride, pH, and TDS. Interwell and intrawell prediction limits are updated periodically during the assessment monitoring period as sufficient data became available.

Prediction limits for the interwell tests were recalculated using data collected during the 2021 assessment monitoring events. New data were tested for outliers prior to being added to the background dataset. The updated boron, calcium, chloride, pH, and TDS prediction limits were calculated using a one-of-two retesting procedure, as during detection monitoring. The revised interwell prediction limits were used to evaluate potential SSIs for boron, calcium, chloride, pH, and TDS.

Mann-Whitney (Wilcoxon rank-sum) tests were performed to determine whether the newer data are affected by a release from the BAP. Because the interwell Appendix III limits and the Appendix IV GWPSs are based on data from upgradient wells, which we would not expect to have been impacted by a release, these tests were used for intrawell Appendix III tests only. Mann-Whitney tests were used to compare the medians of historical data (June 2016 – June 2019) to the new compliance samples (October 2019 – May 2021) for sulfate and fluoride. Results were evaluated to determine if the medians of the two groups were similar at the 99% confidence level. Where no significant difference was found, the new compliance data were added to the background dataset. Where a statistically significant difference was found between the medians of the two groups, the data were reviewed to evaluate the cause of the difference and to determine if adding newer data to the background dataset, replacing the background dataset with the newer data, or continuing to use the existing background dataset was most appropriate. If the differences appeared to have been caused by a release, then the previous background dataset would have continued to be used without the addition of the more recent data. Statistically significant differences were found between the two groups for sulfate and fluoride at select wells. The

complete Mann-Whitney test results and a summary of the significant findings can be found in Attachment B.

After the revised background set was established, a parametric or non-parametric analysis was selected based on the distribution of the data and the frequency of non-detect data. Estimated results less than the practical quantitation limit (PQL) – i.e., "J-flagged" data – were considered detections and the estimated results were used in the statistical analyses. Non-parametric analyses were selected for datasets with at least 50% non-detect data or datasets that could not be normalized. Parametric analyses were selected for datasets (either transformed or untransformed) that passed the Shapiro-Wilk / Shapiro-Francía test for normality. The Kaplan-Meier non-detect adjustment was applied to datasets with between 15% and 50% non-detect data. For datasets with fewer than 15% non-detect data, non-detect data were replaced with one half of the PQL. The selected analysis (i.e., parametric or non-parametric) and transformation (where applicable) for each background dataset are shown in Attachment B.

Interwell UPLs were updated for boron, calcium, chloride, pH, and TDS and lower prediction limits (LPLs) were also updated for pH using historical data through October 2021. Except as noted in Attachment B, intrawell UPLs were updated for fluoride and sulfate using all the historical data through May 2021 to represent background values. The updated prediction limits are summarized in Table 3. The prediction limits were calculated for a one-of-two retesting procedure; i.e., if at least one sample in a series of two does not exceed the UPL, or in the case of pH, is neither less than the LPL nor greater than the UPL, then it can be concluded that an SSI has not occurred. In practice, where the initial result does not exceed the UPL, or in the case of pH, is neither less than the LPL nor greater than the UPL, a second sample will not be collected. The retesting procedures allowed achieving an acceptably high statistical power to detect changes at compliance wells for constituents evaluated using intrawell prediction limits.

2.2.4 Evaluation of Potential Appendix III SSIs

A review of the Appendix III results was also completed to assess whether concentrations of Appendix III parameters at the compliance wells exceeded background concentrations.

Data collected during the October 2021 assessment monitoring event from each compliance well were compared to the re-calculated prediction limits to evaluate results above background values. The results from this event and the prediction limits are summarized in Table 3. The following exceedances of the UPLs were noted:

- Boron concentrations exceeded the interwell UPL of 1.36 mg/L at MW-1505 (8.22 mg/L), MW-1506 (5.90 mg/L), MW-1507 (7.28 mg/L), MW-1509 (7.37 mg/L) and MW-1510 (7.70 mg/L).
- Calcium concentrations exceeded the interwell UPL of 247 mg/L at MW-1505 (273 mg/L), MW-1506 (282 mg/L), and MW-1507 (255 mg/L).

- Chloride concentrations exceeded the interwell UPL of 238 mg/L at MW-1505 (265 mg/L), MW-1506 (328 mg/L), and MW-1507 (262 mg/L).
- Sulfate concentrations exceeded the intrawell UPL of 408 mg/L at MW-1505 (601 mg/L), the intrawell UPL of 369 mg/L at MW-1506 (399 mg/L), and the intrawell UPL of 373 mg/L at MW-1507 (378 mg/L).
- TDS concentrations exceeded the interwell UPL of 1,200 mg/L at MW-1505 (1,560 mg/L), MW-1506 (1,340 mg/L), MW-1507 (1,320 mg/L), MW-1509 (1,260 mg/L), and MW-1510 (1,250 mg/L).

While the prediction limits were calculated for a one-of-two retesting procedure, SSIs were conservatively assumed if the October 2021 sample was above the UPL or below the LPL. Based on these results, concentrations of Appendix III constituents appear to be above background levels at compliance wells.

2.3 <u>Conclusions</u>

A semi-annual assessment monitoring event was conducted at the BAP in accordance with the CCR Rule. The laboratory and field data were reviewed prior to statistical analysis, with no QA/QC issues identified that impacted data usability. A review of outliers identified no potential outliers in the October 2021 data. GWPSs were re-established for the Appendix IV parameters. A confidence interval was constructed at each compliance well for each Appendix IV parameter; SSLs were concluded if the entire confidence interval exceeded the GWPS. No SSLs were identified. Appendix III parameters were compared to re-established prediction limits, with exceedances identified for boron, calcium, chloride, sulfate, and TDS.

Based on this evaluation, the Mitchell BAP CCR unit will remain in assessment monitoring.

SECTION 3

REFERENCES

Geosyntec Consultants (Geosyntec). 2018. Statistical Analysis Summary – Bottom Ash Pond, Mitchell Plant, Moundsville, West Virginia. January 2018.

Geosyntec. 2020. Statistical Analysis Plan. October 2020.

Geosyntec. 2021. Statistical Analysis Summary – Bottom Ash Pond, Mitchell Plant, Moundsville, West Virginia. September 2021.

TABLES

Table 1 - Groundwater Data SummaryMitchell Plant - Bottom Ash Pond

Demonster	Unit	MW-1504	MW-1504 MW-1505 MW-1506 MW-1507		MW-1508	MW-1508 MW-1509			
Parameter	10/19/2		10/19/2021	10/19/2021	10/19/2021	10/20/2021	10/19/2021	10/20/2021	
Antimony	μg/L	0.1 U	0.03 J	0.03 J	0.04 J	0.1 U	0.03 J	0.02 J	
Arsenic	μg/L	0.21	0.29	0.27	0.37	0.30	0.33	0.26	
Barium	μg/L	34.8	38.9	44.7	45.5	29.6	37.3	29.7	
Beryllium	μg/L	0.05 U	0.05 U	0.05 U	0.009 J	0.05 U	0.05 U	0.05 U	
Boron	mg/L	0.046 J	8.22	5.90	7.28	0.439	7.37	7.70	
Cadmium	μg/L	0.024	0.025	0.022	0.035	0.037	0.012 J	0.005 J	
Calcium	mg/L	252	273	282	255	195	234	186	
Chloride	mg/L	107	265	328	262	157	238	215	
Chromium	μg/L	0.26	0.42	0.55	2.31	0.53 0.244	0.61 0.261 1.32	0.57	
Cobalt	μg/L	0.027	0.215	0.465	0.845			0.128	
Combined Radium	pCi/L	1.48	1.98	1.42	1.24	0.17		0.62	
Fluoride	mg/L	0.15	0.03 J	0.04 J	0.07	0.09	0.15	0.13	
Lead	μg/L	0.2 U	0.10 J	0.13 J	0.23	0.14 J	0.20	0.11 J	
Lithium	mg/L	0.00434	0.00577	0.00735	0.00784	0.00423	0.00763	0.00701	
Mercury	μg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.002 J	0.005 U	
Molybdenum	μg/L	0.2 J	0.2 J	1	0.7	0.4 J	0.3 J	0.5	
Selenium	μg/L	4.38	0.09 J	0.10 J	0.5 U	0.15 J	0.24 J	0.23 J	
Sulfate	mg/L	467	601	399	378	283	413	409	
Thallium	μg/L	0.2 U	0.06 J	0.06 J	0.2 U	0.2 U	0.2 U	0.2 U	
Total Dissolved Solids	mg/L	1,150	1,560	1,340	1,320	940	1,260	1,250	
pН	SU	SU 7.1 7.1		7.3	7.2	7.4	7.2	7.3	

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. For statistical analysis, parameters which were not detected were replaced with the reporting limit.

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not analyzed

Table 2 - Appendix IV Groundwater Protection Standards
Mitchell Plant - Bottom Ash Pond

Constituent Name	MCL	CCR Rule-Specified	Calculated UTL	GWPS
Antimony, Total (mg/L)	0.00600		0.000100	0.00600
Arsenic, Total (mg/L)	0.0100		0.00165	0.0100
Barium, Total (mg/L)	2.00		0.0534	2.00
Beryllium, Total (mg/L)	0.00400		0.0000600	0.00400
Cadmium, Total (mg/L)	0.00500		0.0000900	0.00500
Chromium, Total (mg/L)	0.100		0.00197	0.100
Cobalt, Total (mg/L)	n/a	0.00600	0.00289	0.00600
Combined Radium, Total (pCi/L)	5.00		1.95	5.00
Fluoride, Total (mg/L)	4.00		0.250	4.00
Lead, Total (mg/L)	n/a	0.0150	0.00477	0.0150
Lithium, Total (mg/L)	n/a	0.0400	0.0300	0.0400
Mercury, Total (mg/L)	0.00200		0.00000800	0.00200
Molybdenum, Total (mg/L)	n/a	0.100	0.00182	0.100
Selenium, Total (mg/L)	0.0500		0.00646	0.0500
Thallium, Total (mg/L)	0.00200		0.000200	0.00200

Notes:

MCL = Maximum Contaminant Level

CCR = Coal Combustion Residual

GWPS = Groundwater Protection Standard

Calculated UTL (Upper Tolerance Limit) represents site-specific background values.

Table 3 - Appendix III Data SummaryMitchell Plant - Bottom Ash Pond

A	TL. A	Description	MW-1505	MW-1506	MW-1507	MW-1509	MW-1510			
Analyte	Unit	Description	10/19/2021	10/19/2021	10/19/2021	10/19/2021	10/20/2021			
Boron	mg/L	Interwell Background Value (UPL)	1.36							
DOIOII	mg/L	Analytical Result	8.22	5.90	7.28	7.37	7.70			
Calcium	mg/L	Interwell Background Value (UPL)	247							
Calcium	mg/L	Analytical Result	273	282	255	234	186			
Chloride	mg/L	Interwell Background Value (UPL)	238							
Cilionde	mg/L	Analytical Result	265	328	262	238	215			
Fluoride	mg/L	Intrawell Background Value (UPL)	0.20	0.20	0.20	0.16	0.13			
Fluoride	mg/L	Analytical Result	0.03	0.03 0.04		0.15	0.13			
		Interwell Background Value (UPL)		8.6						
pH	SU	Interwell Background Value (LPL)	6.9							
		Analytical Result	7.1	7.3	7.2	7.2	7.3			
Sulfate	ma/I	Intrawell Background Value (UPL)	408	369	373	492	523			
Suitate	mg/L	Analytical Result	601	399	378	413	409			
Total Dissolved Solids	ma/I	Interwell Background Value (UPL)	1,200							
Total Dissolved Sollds	mg/L	Analytical Result	1,560	1,340	1,320	1,260	1,250			

Notes:

UPL: Upper prediction limit LPL: Lower prediction limit **Bold values exceed the background value.** Background values are shaded gray.

ATTACHMENT A Certification by Qualified Professional Engineer

Certification by Qualified Professional Engineer

I certify that the selected and above described statistical method is appropriate for evaluating the groundwater monitoring data for the Mitchell Bottom Ash Pond CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER

Printed Name of Licensed Professional Engineer

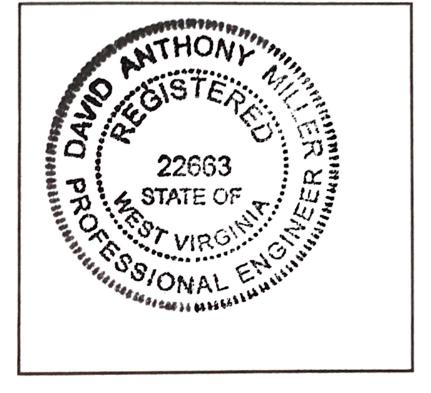
Daird Anthony Miller Signature

22663

WEST VIRGINIA

License Number

Licensing State

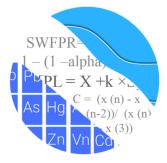


02-14-22

Date

ATTACHMENT B Statistical Analysis Output

GROUNDWATER STATS CONSULTING



January 6, 2022

Geosyntec Consultants Attn: Ms. Allison Kreinberg 941 Chatham Lane, #103 Columbus, OH 43221

RE: Mitchell Bottom Ash Pond (BAP) Assessment Monitoring & Background Update – Fall 2021

Dear Ms. Kreinberg,

Groundwater Stats Consulting, formerly the statistical consulting division of Sanitas Technologies, is pleased to provide the statistical analysis and background update of 2021 groundwater data for American Electric Power Company's Mitchell Bottom Ash Pond. The analysis complies with the federal rule for the Disposal of Coal Combustion Residuals from Electric Utilities (CCR Rule, 2015) as well as with the USEPA Unified Guidance (2009).

Sampling at each of the wells below began at Mitchell Bottom Ash Pond for the CCR program in 2016. The monitoring well network, as provided by Geosyntec Consultants, consists of the following:

- **Upgradient wells:** MW-1504 and MW-1508
- Downgradient wells: MW-1505, MW-1506, MW-1507, MW-1509, and MW-1510

Data were sent electronically, and the statistical analysis was conducted according to the Statistical Analysis Plan and screening evaluation prepared by GSC and approved by Dr. Kirk Cameron, PhD Statistician with MacStat Consulting, primary author of the USEPA Unified Guidance, and Senior Advisor to GSC. The analysis was reviewed by Kristina Rayner, Groundwater Statistician and Founder of Groundwater Stats Consulting.

The CCR program consists of the following constituents listed below. The terms "constituent" and "parameter" are interchangeable.

- Appendix III (Detection Monitoring) boron, calcium, chloride, fluoride, pH, sulfate, and TDS
- Appendix IV (Assessment Monitoring) antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, combined radium 226 + 228, fluoride, lead, lithium, mercury, molybdenum, selenium, and thallium

Time series plots and box plots for Appendix III and IV parameters are provided for all wells (Figures A and B). Values which have been flagged as outliers may be seen in a lighter font and as a disconnected symbol on the time series plots. A summary of flagged values follows this letter (Figure C). The time series plots are used to evaluate concentrations over time and between wells, to initially screen for suspected outliers and trends; while the box plots provide visual representation of variation within individual wells and between wells. For all constituents, a substitution of the most recent reporting limit is used for non-detect data. While the reporting limits may vary from well to well, a single reporting limit substitution is used across all wells for a given parameter in the time series plots since the wells are plotted as a group.

For regulatory comparison of current observations against statistical limits for Appendix III constituents, the annual site-wide false positive rate is based on the USEPA Unified Guidance (2009) recommendation of 10% (5% for each semi-annual sample event). Power curves were included with the previous update to demonstrate that the selected statistical method provides sufficient power to detect a change at any of the downgradient wells which complies with the USEPA Unified Guidance recommendation. The EPA suggests the selected statistical method should provide at least 55% power at 3 standard deviations or at least 80% power at 4 standard deviations. Power curves were based on the following:

Semi-Annual Sampling 1-of-2 resample plan # Constituents, c=7 # Downgradient wells, w=5

All data were initially screened for outliers and trends in December 2017. As a result of that screening, the statistical methods implemented at this site are listed below.

Summary of Statistical Methods – Appendix III Parameters

- 1) Intrawell prediction limits, combined with a 1-of-2 resample plan for fluoride and sulfate
- 2) Interwell prediction limits, combined with a 1-of-2 resample plan for boron, calcium, chloride, pH, and TDS

Parametric prediction limits are utilized when the screened historical data follow a normal or transformed-normal distribution. When data cannot be normalized or the majority of data are non-detects, a nonparametric test is utilized. While the annual false positive rate associated with parametric limits is fixed at 10% as recommended by the EPA Unified Guidance (2009), the false positive rate associated with nonparametric limits is not fixed and depends upon the available background sample size, number of future comparisons, and verification resample plan. The distribution of data is tested using the Shapiro-Wilk/Shapiro-Francia test for normality. After testing for normality and performing any adjustments as discussed below (US EPA, 2009), data are analyzed using either parametric or non-parametric prediction limits as appropriate. Non-detects are handled as follows:

- No statistical analyses are required on wells and analytes containing 100% nondetects (USEPA Unified Guidance, 2009, Chapter 6).
- When data contain <15% non-detects in background, simple substitution of onehalf the reporting limit is utilized in the statistical analysis. The reporting limit utilized for non-detects is the most recent practical quantification limit (PQL) as reported by the laboratory.
- When data contain between 15-50% non-detects, the Kaplan-Meier non-detect adjustment is applied to the background data. This technique adjusts the mean and standard deviation of the historical concentrations to account for concentrations below the reporting limit.
- Nonparametric tolerance limits are used on data containing greater than 50% non-detects.

Natural systems continuously evolve due to physical changes made to the environment. Examples include capping a landfill, paving areas near a well, or lining a drainage channel to prevent erosion. Periodic updating of background statistical limits is necessary to accommodate these types of changes. In the intrawell case, data for all wells and constituents may be re-evaluated when a minimum of 4 new data points are available to determine whether earlier concentrations are representative of present-day groundwater quality. In the interwell case, prediction limits are updated with upgradient well data following each sampling event after careful screening for any new outliers. In some cases, deselecting the earlier portion of data may be necessary prior to construction of limits so

that resulting statistical limits are conservative (i.e. lower) from a regulatory perspective and capable of rapidly detecting changes in groundwater quality. Even though the data are excluded from the calculation, the values will continue to be reported and shown in tables and graphs.

Summary of Background Screening Conducted in December 2017

Intrawell prediction limits combined with a 1-of-2 verification strategy were recommended for fluoride and sulfate; and interwell prediction limits combined with a 1-of-2 verification strategy were recommended for boron, calcium, chloride, pH, and TDS. All proposed background data were screened for outliers and trends during the background screening. The findings of those reports were submitted at that time. Interwell prediction limits utilize pooled upgradient well data for construction of statistical limits. During each sample event, upgradient well data are screened for any newly suspected outliers or obvious trending patterns using time series plots. Intrawell prediction limits utilize historical data within a given well for comparison of compliance data from the same well. As recommended in the EPA Unified Guidance (2009), the background data sets are periodically evaluated for the purpose of updating statistical limits, as described below.

Appendix III Background Update Summaries

December 2019

Samples from all wells for parameters using intrawell prediction limits and from all upgradient wells for parameters using interwell prediction limits were evaluated using Tukey's outlier test and visual screening. A summary of Tukey's test results and flagged outliers were included with the December 2019 background update.

For constituents requiring intrawell prediction limits (fluoride and sulfate), the Mann-Whitney (Wilcoxon Rank Sum) test was used to compare the medians of historical data through June 2017 to the new compliance samples at each well through June 2019 to evaluate whether the groups are statistically similar at the 99% confidence level, in which case background data may be updated with compliance data. Although statistically significant differences were found among well/constituent pairs using intrawell statistical methods, all background data were updated with compliance data. A complete list of the Mann-Whitney test results and associated statistical explanations were included with the December 2019 Background Update report. Intrawell prediction limits were updated for each well and constituent using the updated background data through June 2019. A summary table and complete graphical results were included with the report.

For parameters tested using interwell analyses (boron, calcium, chloride, pH, and TDS), the Sen's Slope/Mann-Kendall trend test was used on upgradient wells to determine whether concentrations are statistically increasing, decreasing or stable. While increasing and decreasing trends were identified, no adjustments were required. The interwell prediction limits, combined with a 1-of-2 resample plan, were updated using all available data from upgradient wells for the same time period. Results were included with the December 2019 Background Update report.

February 2021

Prior to updating background data during the 2021 analysis, Tukey's outlier test and visual screening were used to re-evaluate data for outliers at all upgradient wells for parameters utilizing interwell prediction limits, i.e., boron, calcium, chloride, pH and TDS. Tukey's outlier test on pooled upgradient well data identified only two values outliers for pH. Those values were similar to each other and not dramatically higher than the remaining observations. Therefore, no values were flagged in upgradient wells for Appendix III parameters.

As mentioned above, in the intrawell case, data for all wells and constituents will be re-evaluated when a minimum of 4 new data points are available. Sulfate lacked sufficient data to update background during the February 2021 update; therefore, intrawell prediction limits for fluoride and sulfate were not updated at that time and continued to use historical data through June 2019 for constructing statistical limits.

For boron, calcium, chloride, pH, and TDS, which are tested using interwell prediction limits, the Sen's Slope/Mann-Kendall trend test was used to test data in upgradient wells to determine whether concentrations are statistically increasing, decreasing or stable. A statistically significant increasing trend was identified for pH in well MW-1504 and a statistically significant decreasing trend was noted for chloride in well MW-1508. The magnitude of these trends was fairly small relative to the range of concentrations in the pooled upgradient data. All reported data through January 2021 from upgradient wells were used to construct interwell prediction limits, combined with a 1-of-2 resample plan, for boron, calcium, chloride, pH, and TDS.

January 2022

Outlier Analysis

Prior to updating background data during this analysis, Tukey's outlier test and visual screening were used to re-evaluate data through May 2021 at all wells for parameters

using intrawell prediction limits (fluoride and sulfate) and through October 2021 at all upgradient wells for parameters utilizing interwell prediction limits (boron, calcium, chloride, pH, and TDS). For parameters which use intrawell prediction limits, Tukey's outlier test on all wells identified one value for fluoride as an outlier; however, the identified value was a historic non-detect value and is less than the Maximum Containment Level (MCL). Therefore, this value was not flagged as an outlier.

For parameters which use interwell prediction limits, Tukey's outlier test identified two values for pH as outliers but these values were similar to remaining observations within their respective record and were, therefore, not flagged in the database. No new values were flagged as outliers and no changes were made to previously flagged outliers. Tukey's outlier test results for all Appendix III parameters are shown in Figure C. A list of all flagged values follows this report.

Intrawell - Mann-Whitney Evaluation

For constituents requiring intrawell prediction limits, the Mann-Whitney (Wilcoxon Rank Sum) test was used to compare the medians of historical data through June 2019 to the new compliance samples through May 2021 at each well to evaluate whether the groups are statistically different at the 99% confidence level (Figure D). When no statistically significant difference is found, background data may be updated with compliance data. Statistically significant differences (either an increase or decrease in median concentrations) were found between the two groups for the following well/constituent pairs:

Increase:

• Sulfate: MW-1505 and MW-1507

Decrease:

• Fluoride: MW-1504 (upgradient), MW-1505, and MW-1506

Typically, when the test concludes that the medians of the two groups are statistically significantly different, particularly in the downgradient wells, the background data are not updated to include the newer data, unless it can be reasonably justified that the change in concentrations reflects a naturally occurring shift unrelated to practices at the site. In studies such as the current one, in which at least one of the segments being compared is of short duration, the comparison is complicated by the fact that normal short-term variation may be mistaken for long-term change in medians.

Regarding well/constituent pairs with statistically significant increases in medians, newer observations are higher than historical concentrations and appear to be increasing. Therefore, the background records for the following well/constituent pairs were not updated at this time and will be re-evaluated during the next background update:

• Sulfate: MW-1505 and MW-1507

Although not identified as statistically significant by the Mann-Whitney test of medians at the 99% confidence level, the two most recent reported concentrations for sulfate at well MW-1506 are also above historical concentrations and appear to be increasing. Therefore, this well/constituent pair was not updated at this time. A list of well/constituent pairs using a truncated portion of their record follows this report.

Regarding well/constituent pairs with statistically significant decreases in medians, the background datasets were updated through June 2021 for the following well/constituent pairs in order to construct statistical limits that are conservative from a regulatory perspective:

• Fluoride: MW-1504 (upgradient), MW-1505, and MW-1506

For fluoride in downgradient wells MW-1505 and MW-1506, the statistically significant decrease in medians identified by the Mann-Whitney test was a result of historic non-detect values in the earlier portion of the record being compared to more recent trace values in the latter part of the record. While the non-detects at this level appear to be outliers, the remaining values in the data set are all trace values at very low levels where the measurement precision is also low. The non-detects are not flagged presently but may be re-evaluated in the future. For fluoride in upgradient well MW-1504, the decrease in concentrations was marginal to the overall record and remains below the Maximum Contaminant Level (MCL). In addition, these concentrations represent groundwater quality conditions upgradient of the facility; therefore, the record for this well/constituent pair was updated.

Intrawell – Prediction Limits

Intrawell prediction limits were constructed using all historical data through May 2021, unless otherwise noted above, and a summary table of the updated limits follows this report (Figure E).

Interwell – Trend Test Evaluation

For parameters which are tested using interwell prediction limits, the Sen's Slope/Mann-Kendall trend test was used to test data in upgradient wells to determine whether concentrations are statistically increasing, decreasing or stable (Figure F). Statistically significant trends were identified for the following well/constituent pairs:

Increasing

• pH: MW-1504 and MW-1508

Decreasing

- Chloride: MW-1508
- TDS: MW-1508

Since increasing trends were identified for pH in both upgradient wells and the magnitude of the increase is marginal relative to the concentrations, no adjustments were required for these well/constituent pairs at this time. Similarly, no adjustments were required for TDS in upgradient well MW-1508 because the magnitude of the decrease was marginal relative to the concentrations. For chloride in upgradient well MW-1508, however, earlier concentrations were higher than more recent concentrations; therefore, the earlier portion of the record was deselected to remove the decreasing trend and construct statistical limits that are conservative (i.e., lower) from a regulatory perspective. As more data are collected, all upgradient well data will be re-evaluated for possible deselection of earlier portion of the record if the measurements no longer represent present-day groundwater quality conditions.

Interwell – Prediction Limits

The interwell prediction limits for boron, calcium, chloride, pH, and TDS, combined with a 1-of-2 resample plan, were updated using all pooled upgradient data through October 2021, except for chloride as discussed above. The summary table follows this letter (Figure G).

Evaluation of Appendix IV Parameters – October 2021

Data were last screened for outliers by Tukey's outlier test during the December 2019 background update, and a summary of those findings was submitted with that report. During this analysis, data were screened for any new outliers using time series graphs and Tukey's outlier test. No additional values were flagged. When values are identified as outliers, they are flagged in the database with "o" and are deselected prior to construction

of statistical limits. A list of all flagged outliers follows this letter (Figure C). Additionally, flagged data are displayed in a lighter font and as a disconnected symbol on the time series reports, as well as in a lighter font on the accompanying data pages.

Interwell Upper Tolerance Limits

Interwell upper tolerance limits were used to calculate the site-specific background limits from pooled upgradient well data through October 2021 for the Appendix IV constituents discussed above (Figure H). Parametric tolerance limits are calculated, with a target of 95% confidence and 95% coverage, when data follow a normal or transformed-normal distribution such as for barium, chromium, cobalt, combined radium 226 + 228, lead, molybdenum, and selenium. When data contained greater than 50% non-detects or did not follow a normal or transformed-normal distribution, non-parametric tolerance limits are used. The confidence and coverage levels for nonparametric tolerance limits are dependent upon the number of background samples.

Groundwater Protection Standards

These limits were compared to the Maximum Contaminant Levels (MCLs) and the CCR-Rule specified levels in the Groundwater Protection Standards (GWPS) table following this letter to determine the highest limit for use as the GWPS in the Confidence Interval comparisons (Figure I).

Confidence Intervals

Confidence intervals were then constructed using all available data through October 2021 on downgradient wells for each of the Appendix IV parameters using the highest limit of either the MCL, CCR-Rule specified, or background as the GWPS as discussed above (Figure J). Only when the entire confidence interval is above a GWPS is the well/constituent pair considered to exceed its respective standard. Complete graphical results of the confidence intervals follow this report and no confidence interval exceedances were noted for any of the Appendix IV parameters. Thank you for the opportunity to assist you in the statistical analysis of groundwater quality for the Mitchell Bottom Ash Pond. If you have any questions or comments, please feel free to contact us.

For Groundwater Stats Consulting,

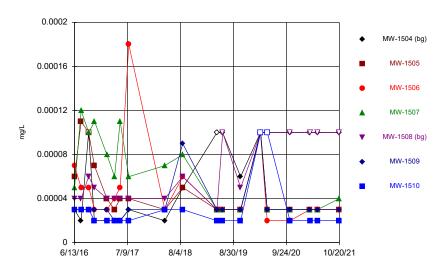
Andrew T. Collins Project Manager

Kristina Rayner

Kristina L. Rayner Groundwater Statistician

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

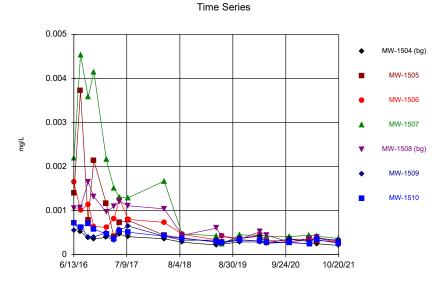
Time Series



Constituent: Antimony, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

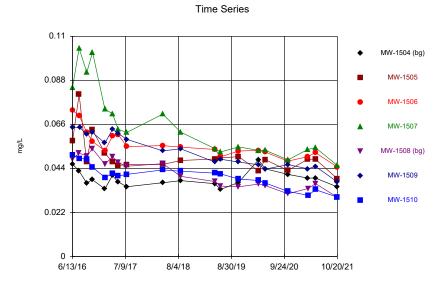
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

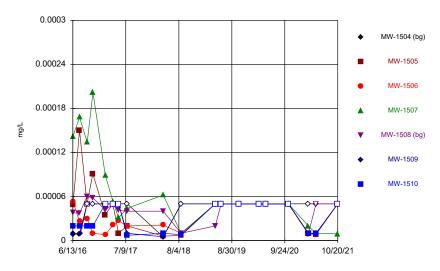


Constituent: Arsenic, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

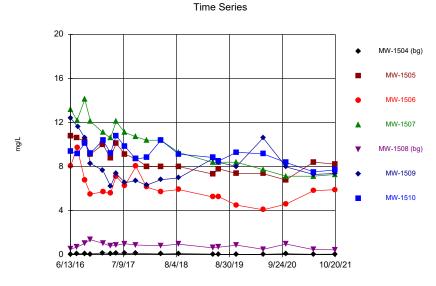
Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG



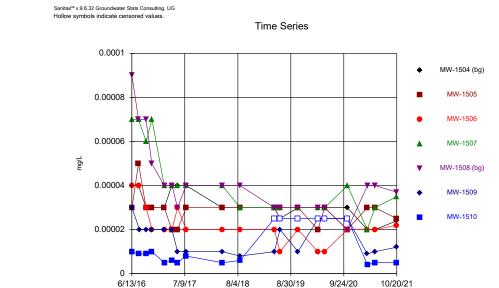
Constituent: Barium, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP Time Series



Constituent: Beryllium, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

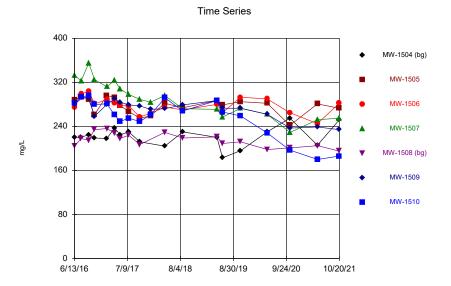


Constituent: Boron, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

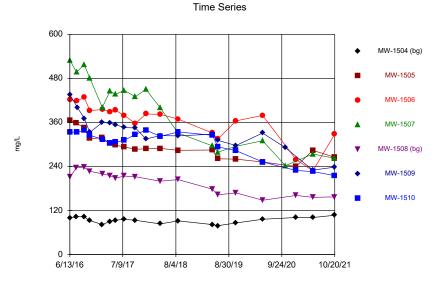


Constituent: Cadmium, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG

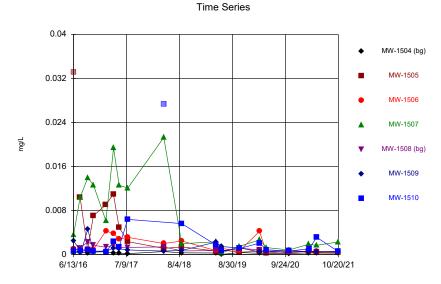


Constituent: Calcium, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

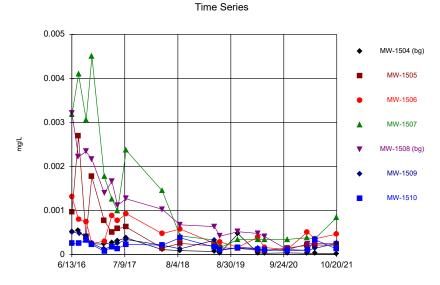


Constituent: Chloride, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



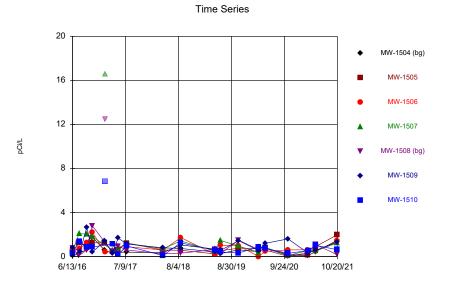
Constituent: Chromium, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Cobalt, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

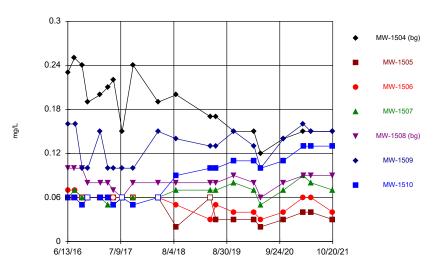
Time Series

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



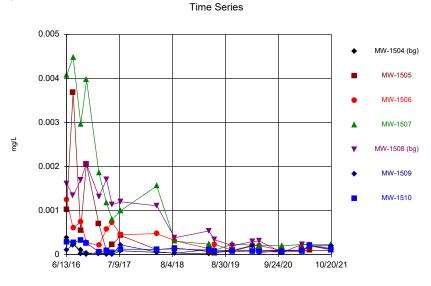
Constituent: Combined Radium 226 + 228 Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP





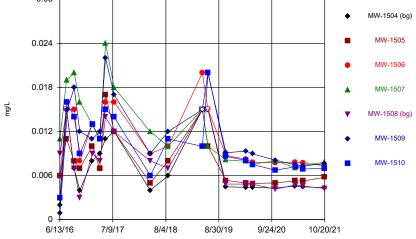
Constituent: Fluoride, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG Hollow symbols indicate censored values



Constituent: Lead, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

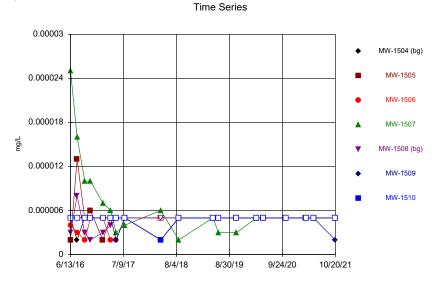




Time Series

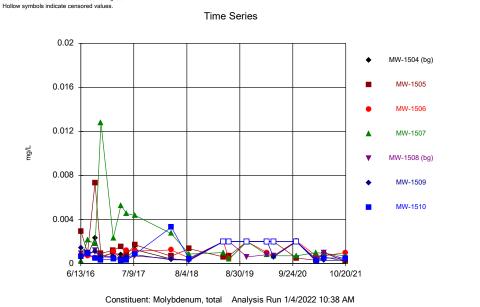
Constituent: Lithium, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG Hollow symbols indicate censored values

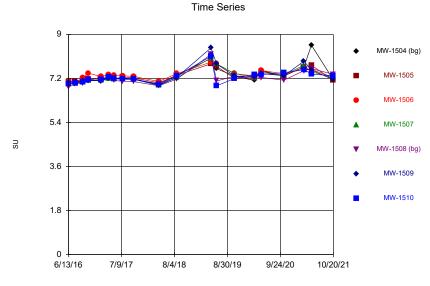


Constituent: Mercury, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

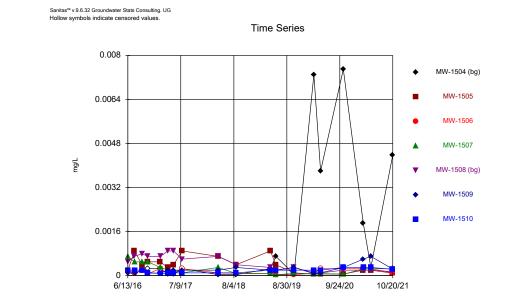
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



Mitchell BAP Client: Geosyntec Data: Mitchell BAP

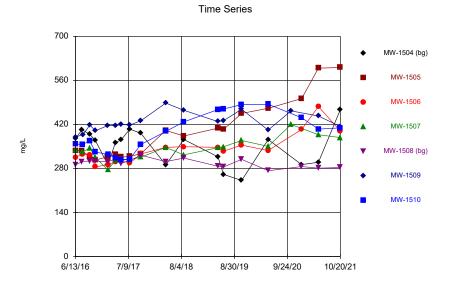


Constituent: pH, field Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Selenium, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

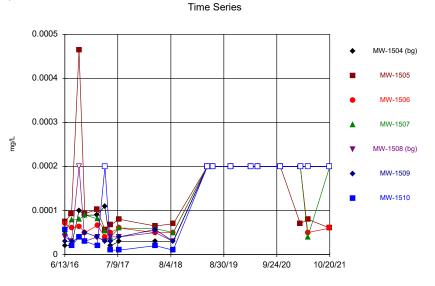
Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG



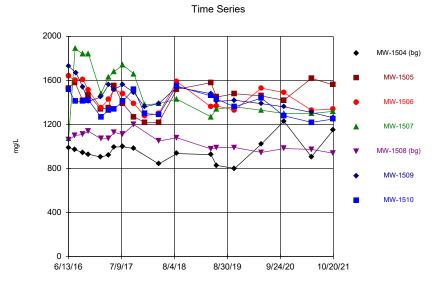
Constituent: Sulfate, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

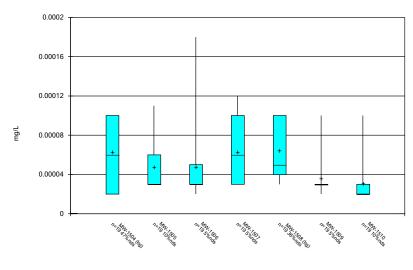


Constituent: Thallium, total Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

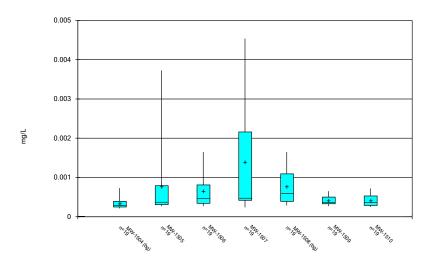


Constituent: Total Dissolved Solids [TDS] Analysis Run 1/4/2022 10:38 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



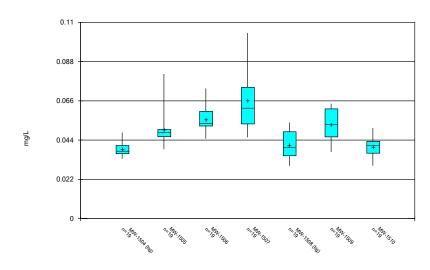
Box & Whiskers Plot



Constituent: Arsenic, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG

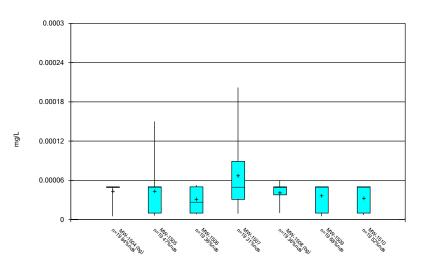
Box & Whiskers Plot



Constituent: Barium, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP







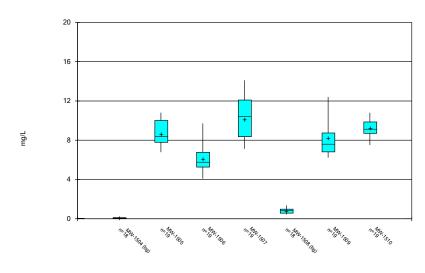
Constituent: Beryllium, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Constituent: Antimony, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

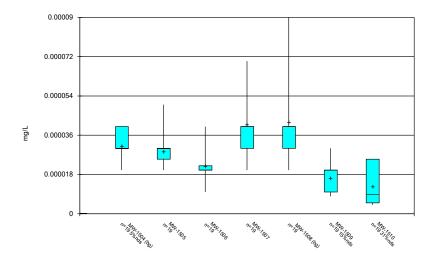
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Box & Whiskers Plot





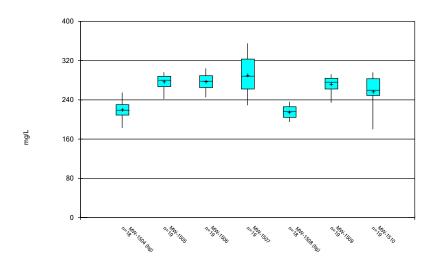
Constituent: Boron, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Cadmium, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG

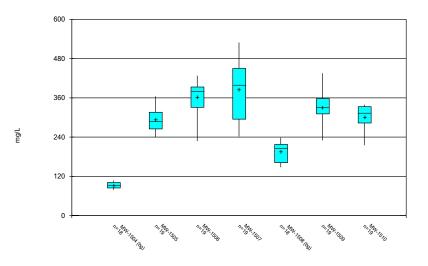
Box & Whiskers Plot



Constituent: Calcium, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

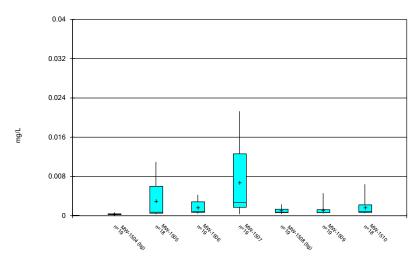


Box & Whiskers Plot

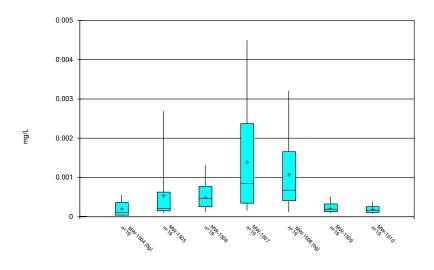


Constituent: Chloride, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



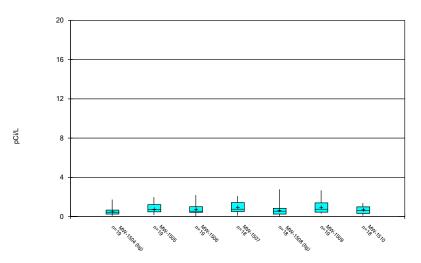
Box & Whiskers Plot



Constituent: Cobalt, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG

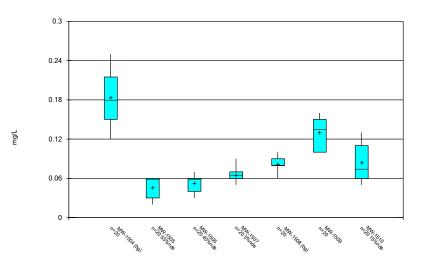
Box & Whiskers Plot



Constituent: Combined Radium 226 + 228 Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP



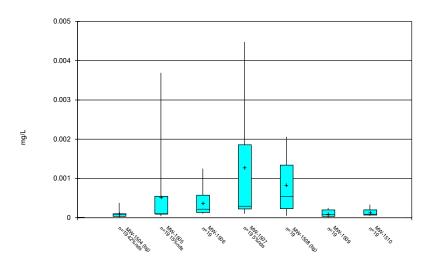




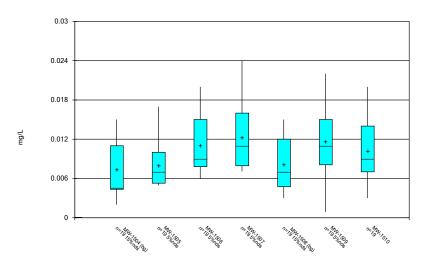
Constituent: Fluoride, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Constituent: Chromium, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



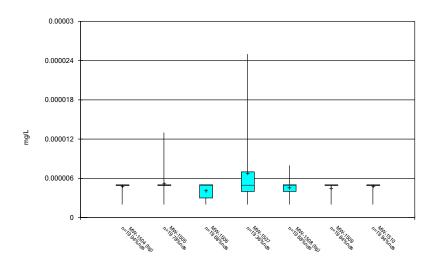
Constituent: Lead, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Lithium, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG

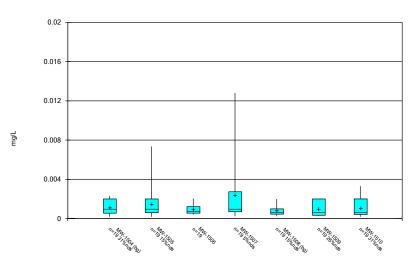
Box & Whiskers Plot



Constituent: Mercury, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

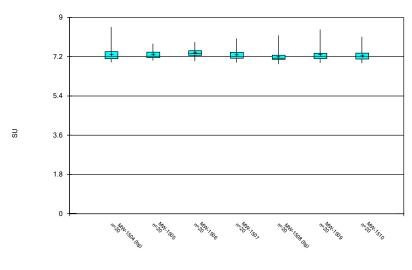






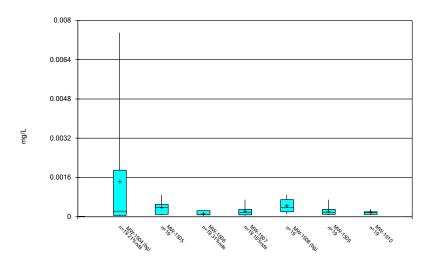
Constituent: Molybdenum, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



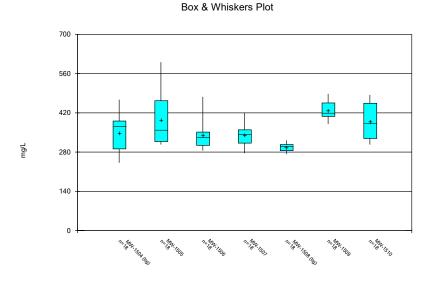
Box & Whiskers Plot

Constituent: pH, field Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Selenium, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

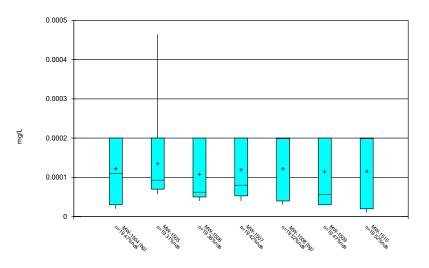
Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG



Constituent: Sulfate, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP



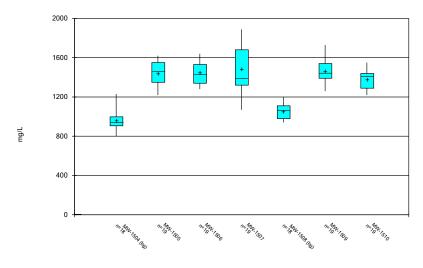
Box & Whiskers Plot



Constituent: Thallium, total Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot

Box & Whiskers Plot



Constituent: Total Dissolved Solids [TDS] Analysis Run 1/4/2022 1:03 PM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Outlier Summary

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/4/2022, 1:04 PM

	MW-1505 Chromium, total (mg/L) MW-1510 Chromium, total (mg/L) MW-1507 Combined Radium 226 + 228 (pCi/L) MW-1508 Combined Radium 226 + 228 (pCi/L) MW-1510 Combined Radium 226 + 228 (pCi/L)
6/14/2016	0.0332 (o)
2/8/2017	16.587 (o) 12.465 (o) 6.828 (o)
4/12/2018	0.0274 (o)

Tukey's Outlier Test - Significant Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/6/2022, 1:24 PM

<u>Constituent</u>	Well	Outlier	<u>Value(s)</u>	Method	<u>Alpha</u>	<u>N</u>	Mean	Std. Dev.	Distribution	Normality Test
Fluoride, total (mg/L)	MW-1507	Yes	0.2	NP	NaN	19	0.07263	0.03263	ln(x)	ShapiroWilk

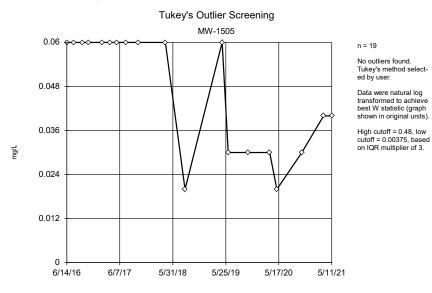
Tukey's Outlier Test - All Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/6/2022, 1:24 PM

Constituent	Well	Outlier	Value(s)	Method	<u>Alpha</u>	<u>N</u>	Mean	Std. Dev.	Distribution	Normality Test
Fluoride, total (mg/L)	MW-1504 (bg)	No	n/a	NP	NaN	19	0.1853	0.03907	x^(1/3)	ShapiroWilk
Fluoride, total (mg/L)	MW-1505	No	n/a	NP	NaN	19	0.04737	0.01593	ln(x)	ShapiroWilk
Fluoride, total (mg/L)	MW-1506	No	n/a	NP	NaN	19	0.1126	0.0773	ln(x)	ShapiroWilk
Fluoride, total (mg/L)	MW-1507	Yes	0.2	NP	NaN	19	0.07263	0.03263	ln(x)	ShapiroWilk
Fluoride, total (mg/L)	MW-1508 (bg)	No	n/a	NP	NaN	19	0.08211	0.01134	normal	ShapiroWilk
Fluoride, total (mg/L)	MW-1509	No	n/a	NP	NaN	19	0.1289	0.02447	x^4	ShapiroWilk
Fluoride, total (mg/L)	MW-1510	No	n/a	NP	NaN	19	0.1037	0.05047	ln(x)	ShapiroWilk
Sulfate, total (mg/L)	MW-1504 (bg)	No	n/a	NP	NaN	17	341.4	52.38	x^5	ShapiroWilk
Sulfate, total (mg/L)	MW-1505	No	n/a	NP	NaN	17	383.7	82.61	ln(x)	ShapiroWilk
Sulfate, total (mg/L)	MW-1506	No	n/a	NP	NaN	17	336.5	46.23	ln(x)	ShapiroWilk
Sulfate, total (mg/L)	MW-1507	No	n/a	NP	NaN	17	337.5	33.92	ln(x)	ShapiroWilk
Sulfate, total (mg/L)	MW-1508 (bg)	No	n/a	NP	NaN	17	298.4	12.87	x^4	ShapiroWilk
Sulfate, total (mg/L)	MW-1509	No	n/a	NP	NaN	17	428.4	29.69	ln(x)	ShapiroWilk
Sulfate, total (mg/L)	MW-1510	No	n/a	NP	NaN	17	388.1	63.62	ln(x)	ShapiroWilk

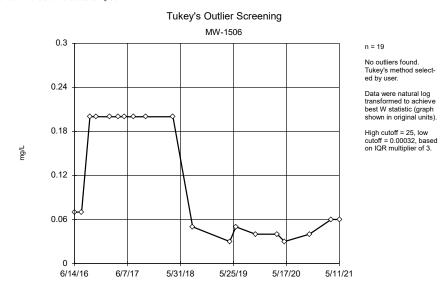
Tukey's Outlier Screening MW-1504 (bg) 0.3 n = 19 No outliers found. Tukey's method selected by user. 0.24 Data were cube root transformed to achieve best W statistic (graph shown in original units). High cutoff = 0.5529, low cutoff = 0.03104, 0.18 based on IQR multiplier of 3. mg/L 0.12 0.06 Ω 6/13/16 6/6/17 5/31/18 5/24/19 5/17/20 5/11/21 Constituent: Fluoride, total Analysis Run 1/6/2022 1:24 PM View: Outlier Tests

Mitchell BAP Client: Geosyntec Data: Mitchell BAP



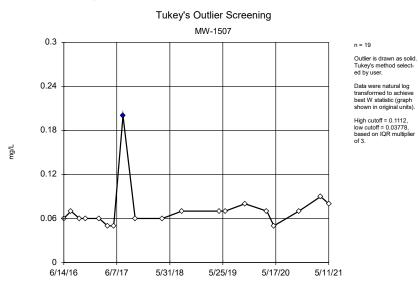
Constituent: Fluoride, total Analysis Run 1/6/2022 1:24 PM View: Outlier Tests Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



Constituent: Fluoride, total Analysis Run 1/6/2022 1:24 PM View: Outlier Tests Mitchell BAP Client: Geosyntec Data: Mitchell BAP

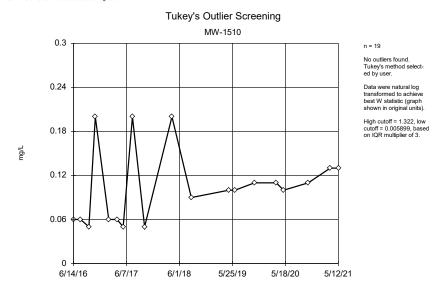




Constituent: Fluoride, total Analysis Run 1/6/2022 1:24 PM View: Outlier Tests Mitchell BAP Client: Geosyntec Data: Mitchell BAP

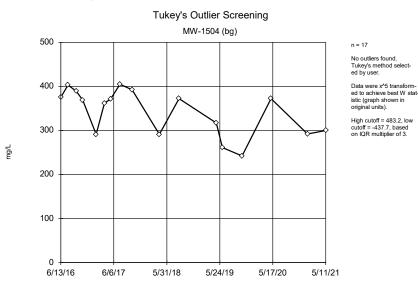
Tukey's Outlier Screening Tukey's Outlier Screening MW-1508 (bg) MW-1509 0.1 0.2 n = 19 n = 19 No outliers found. Tukey's method select-No outliers found. Tukey's method selected by user. ed by user. Ladder of Powers trans-formations did not im-Data were x⁴ transform-ed to achieve best W stat-0.08 0.16 prove normality; analyistic (graph shown in sis run on raw data original units). High cutoff = 0.2038, High cutoff = 0.12 low cutoff = 0.05, based on low cutoff = -0.1829, 0.06 0.12 based on IQR multiplier of 3. IQR multiplier of 3. mg/L mg/L 0.04 0.08 0.02 0.04 Ω 0 5/12/21 5/17/20 5/11/21 6/14/16 6/7/17 6/1/18 5/25/19 5/18/20 6/14/16 6/7/17 5/31/18 5/25/19 Constituent: Fluoride, total Analysis Run 1/6/2022 1:24 PM View: Outlier Tests Constituent: Fluoride, total Analysis Run 1/6/2022 1:24 PM View: Outlier Tests Mitchell BAP Client: Geosyntec Data: Mitchell BAP Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG



Constituent: Fluoride, total Analysis Run 1/6/2022 1:24 PM View: Outlier Tests Mitchell BAP Client: Geosyntec Data: Mitchell BAP



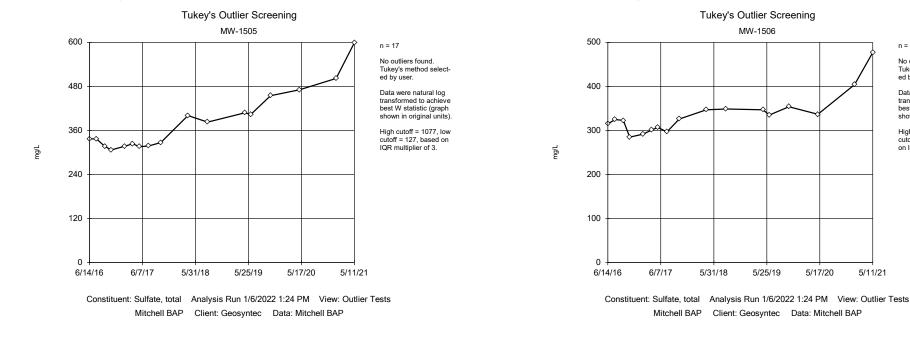


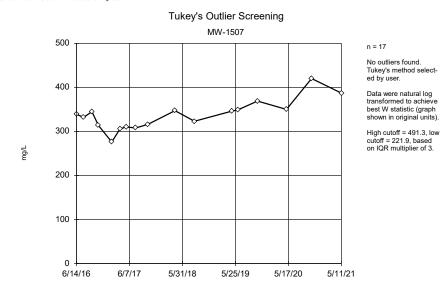
 Constituent: Sulfate, total
 Analysis Run 1/6/2022 1:24 PM
 View: Outlier Tests

 Mitchell BAP
 Client: Geosyntec
 Data: Mitchell BAP

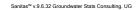
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

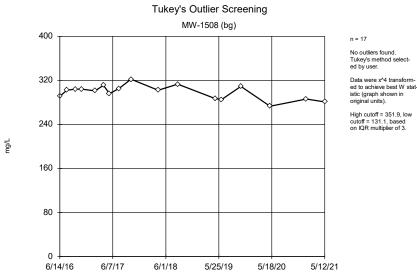
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG





Constituent: Sulfate, total Analysis Run 1/6/2022 1:24 PM View: Outlier Tests Mitchell BAP Client: Geosyntec Data: Mitchell BAP





ed by user. Data were natural log transformed to achieve best W statistic (graph

5/11/21

No outliers found.

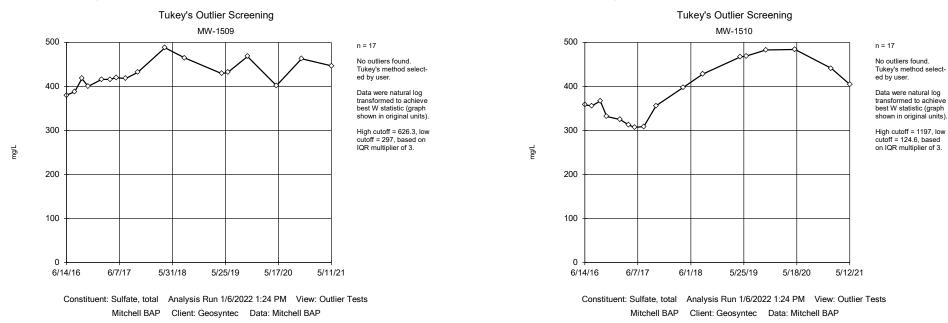
Tukey's method select-

n = 17

shown in original units). High cutoff = 522.1. low cutoff = 202.6, based on IQR multiplier of 3.

Constituent: Sulfate, total Analysis Run 1/6/2022 1:24 PM View: Outlier Tests

Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Tukey's Outlier Test - Upgradient Wells - Significant Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/6/2022, 1:25 PM

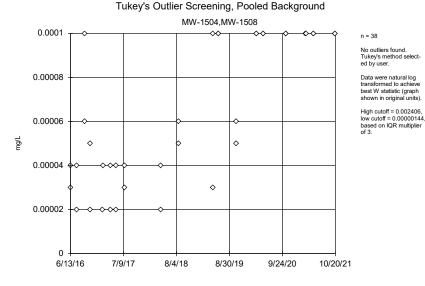
Constituent	Well	Outlier	<u>Value(s)</u>	Method	<u>Alpha N Me</u>	an <u>Std. Dev.</u>	Distribution	Normality Test
pH, field (SU)	MW-1504,MW-1508	Yes	8.56,8.18	NP	NaN 40 7.2	75 0.3439	ln(x)	ShapiroWilk

Tukey's Outlier Test - Upgradient Wells - All Results

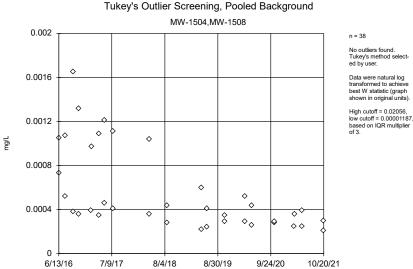
Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/6/2022, 1:25 PM

Constituent	Well	Outlier	Value(s)	Method	<u>Alpha</u>	N	<u>Mean</u>	Std. Dev.	Distribution	Normality Test
Antimony, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.00006368	0.00003308	ln(x)	ShapiroWilk
Arsenic, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.0005563	0.0003731	ln(x)	ShapiroWilk
Barium, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.04021	0.006162	ln(x)	ShapiroWilk
Beryllium, total (mg/L)	MW-1504,MW-1508	n/a	n/a	NP	NaN	38	0.00004261	0.00001484	unknown	ShapiroWilk
Boron, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	36	0.4378	0.4057	ln(x)	ShapiroWilk
Cadmium, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.00003647	0.00001397	ln(x)	ShapiroWilk
Calcium, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	36	218.2	15.3	ln(x)	ShapiroWilk
Chloride, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	36	144.3	56.11	ln(x)	ShapiroWilk
Chromium, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.000684	0.0005213	ln(x)	ShapiroWilk
Cobalt, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.00064	0.0007679	x^(1/3)	ShapiroWilk
Combined Radium 226 + 228 (pCi/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.923	1.997	ln(x)	ShapiroWilk
Fluoride, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	40	0.133	0.05841	ln(x)	ShapiroWilk
Lead, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.0004862	0.0005827	ln(x)	ShapiroWilk
Lithium, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.01009	0.009137	ln(x)	ShapiroWilk
Mercury, total (mg/L)	MW-1504,MW-1508	n/a	n/a	NP	NaN	38	0.000004737	70.00000100	unknown	ShapiroWilk
Molybdenum, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.001002	0.0006698	ln(x)	ShapiroWilk
pH, field (SU)	MW-1504,MW-1508	Yes	8.56,8.18	NP	NaN	40	7.275	0.3439	ln(x)	ShapiroWilk
Selenium, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.0009353	0.001798	ln(x)	ShapiroWilk
Thallium, total (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	38	0.0001229	0.00008068	ln(x)	ShapiroWilk
Total Dissolved Solids [TDS] (mg/L)	MW-1504,MW-1508	No	n/a	NP	NaN	36	1006	100.3	x^(1/3)	ShapiroWilk

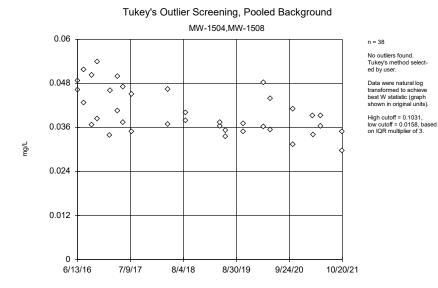




Constituent: Antimony, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP

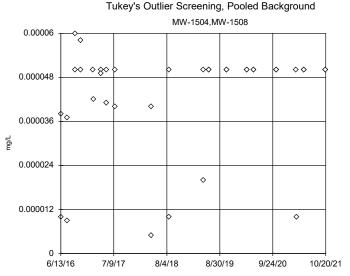


Constituent: Arsenic, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Barium, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP





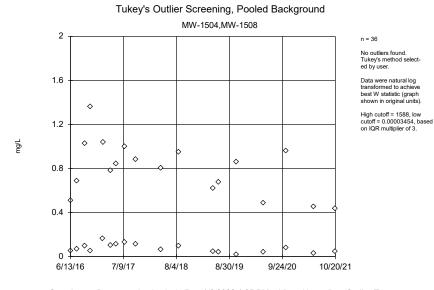
n = 38 No outliers found. Tukey's method select

ed by user. Data were x^4 transform-

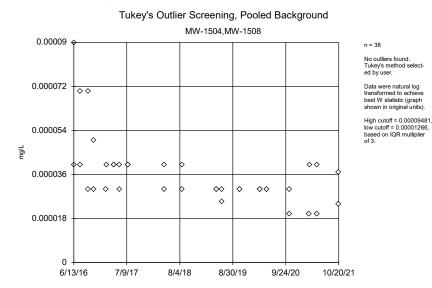
ed to achieve best W statistic (graph shown in original units).

The results were invalidated, because both the lower and upper quartiles represent reporting limits.

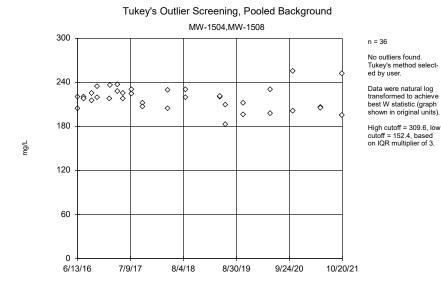
Constituent: Beryllium, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Boron, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP

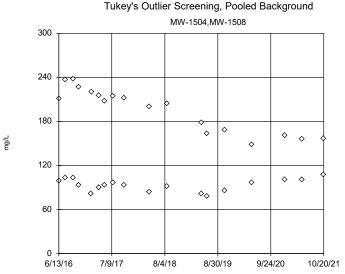


Constituent: Cadmium, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Calcium, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP





n = 36

ed by user.

No outliers found.

Tukey's method select-

Data were natural log

transformed to achieve

best W statistic (graph

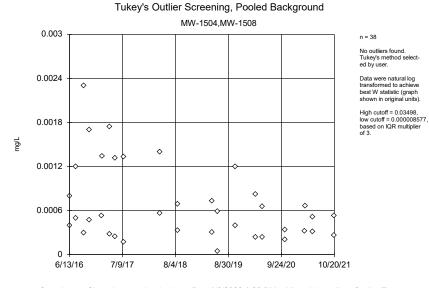
shown in original units).

High cutoff = 2206, low

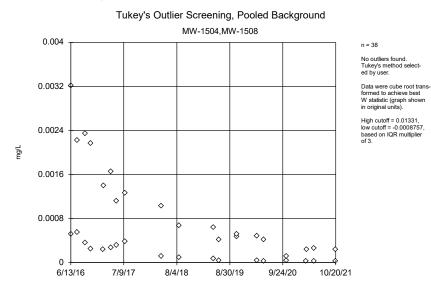
cutoff = 8.725, based

on IQR multiplier of 3.

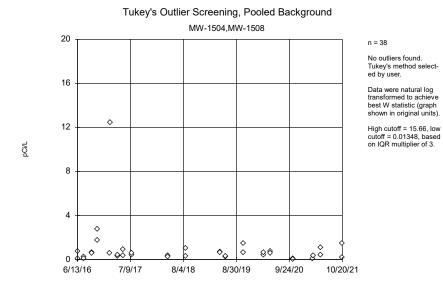
Constituent: Chloride, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Chromium, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP

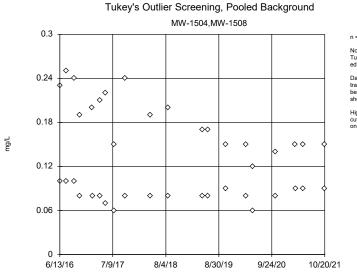


Constituent: Cobalt, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Combined Radium 226 + 228 Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP





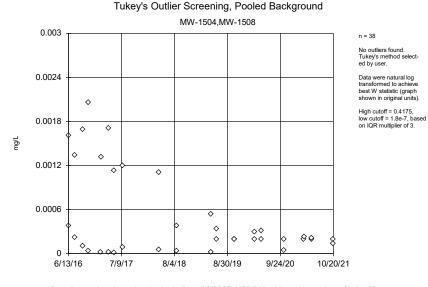
n = 40 No outliers found.

Tukey's method selected by user. Data were natural log

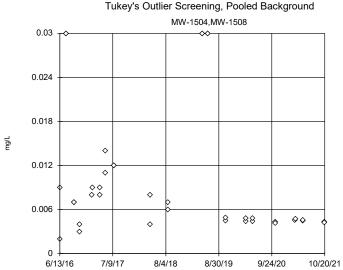
transformed to achieve best W statistic (graph shown in original units).

High cutoff = 2.038, low cutoff = 0.007056, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP

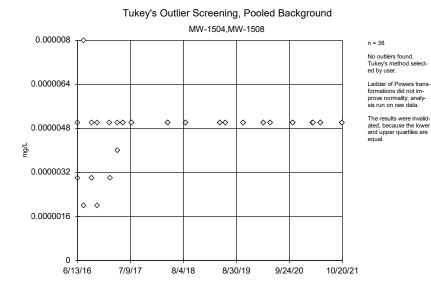


Constituent: Lead, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP



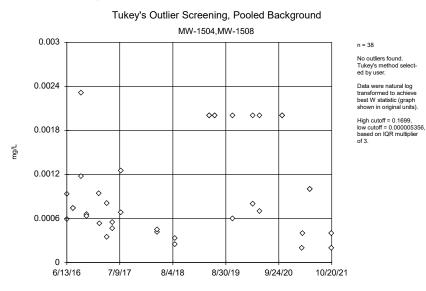
Constituent: Lithium, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



Constituent: Mercury, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP





n = 38

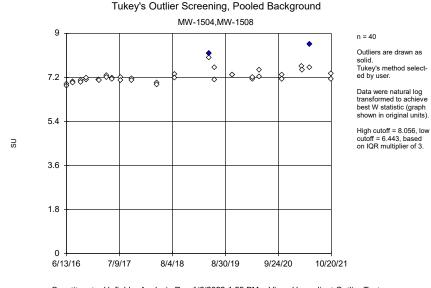
No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

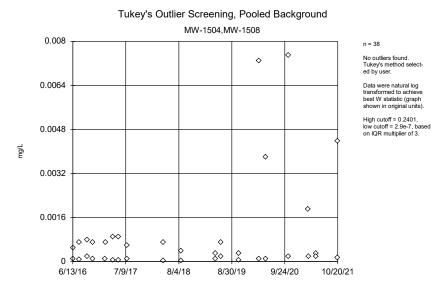
High cutoff = 0.2025, low cutoff = 0.0002505, based on IQR multiplier of 3.

Constituent: Molybdenum, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP

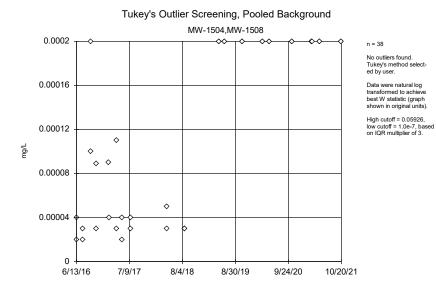




Constituent: pH, field Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP

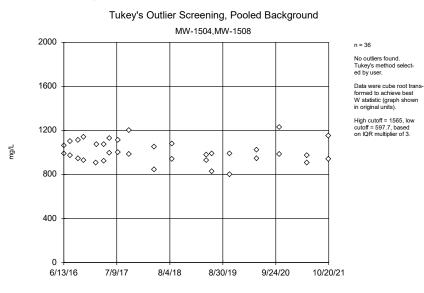


Constituent: Selenium, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Thallium, total Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



Constituent: Total Dissolved Solids [TDS] Analysis Run 1/6/2022 1:25 PM View: Upgradient Outlier Test Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Welch's t-test/Mann-Whitney - Significant Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/4/2022, 1:09 PM

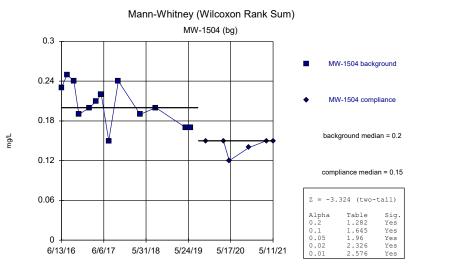
Constituent	Well	Calc.	<u>0.01</u>	Method
Fluoride, total (mg/L)	MW-1504 (bg)	-3.324	Yes	Mann-W
Fluoride, total (mg/L)	MW-1505	-2.997	Yes	Mann-W
Fluoride, total (mg/L)	MW-1506	-2.744	Yes	Mann-W
Sulfate, total (mg/L)	MW-1505	2.891	Yes	Mann-W
Sulfate, total (mg/L)	MW-1507	2.887	Yes	Mann-W

Welch's t-test/Mann-Whitney - All Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/4/2022, 1:09 PM

Constituent	Well	Calc.	<u>0.01</u>	Method
Fluoride, total (mg/L)	MW-1504 (bg)	-3.324	Yes	Mann-W
Fluoride, total (mg/L)	MW-1505	-2.997	Yes	Mann-W
Fluoride, total (mg/L)	MW-1506	-2.744	Yes	Mann-W
Fluoride, total (mg/L)	MW-1507	1.588	No	Mann-W
Fluoride, total (mg/L)	MW-1508 (bg)	0.2858	No	Mann-W
Fluoride, total (mg/L)	MW-1509	0.9982	No	Mann-W
Fluoride, total (mg/L)	MW-1510	1.731	No	Mann-W
Sulfate, total (mg/L)	MW-1504 (bg)	-1.474	No	Mann-W
Sulfate, total (mg/L)	MW-1505	2.891	Yes	Mann-W
Sulfate, total (mg/L)	MW-1506	2.549	No	Mann-W
Sulfate, total (mg/L)	MW-1507	2.887	Yes	Mann-W
Sulfate, total (mg/L)	MW-1508 (bg)	-1.757	No	Mann-W
Sulfate, total (mg/L)	MW-1509	1.191	No	Mann-W
Sulfate, total (mg/L)	MW-1510	2.323	No	Mann-W

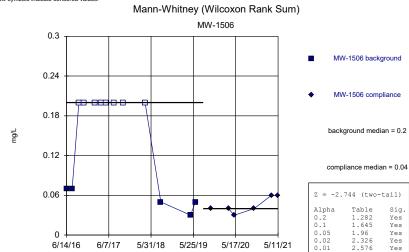
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

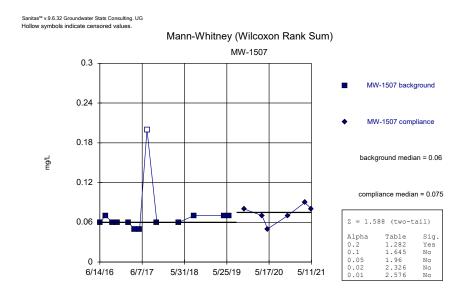


Constituent: Fluoride, total Analysis Run 1/4/2022 1:08 PM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG Hollow symbols indicate censored values. Mann-Whitney (Wilcoxon Rank Sum) MW-1505 MW-1505 background 0.048 MW-1505 compliance 0.036 background median = 0.06 mg/L 0.024 compliance median = 0.03 0.012 Z = -2.997 (two-tail) Alpha 0.2 Table Sig. Yes 1.282 0.1 Yes 0.05 1.96 Yes 0 0.02 2.326 Yes 6/14/16 6/7/17 5/25/19 5/17/20 5/11/21 5/31/18 2.576 Yes

> Constituent: Fluoride, total Analysis Run 1/4/2022 1:08 PM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.





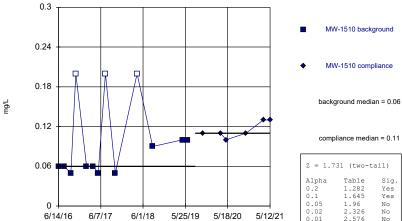
Constituent: Fluoride, total Analysis Run 1/4/2022 1:08 PM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Constituent: Fluoride, total Analysis Run 1/4/2022 1:08 PM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

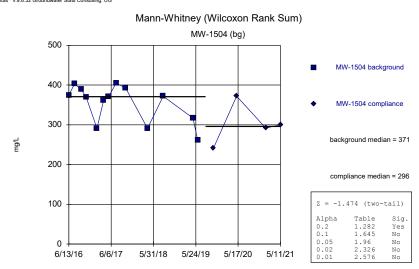
Mann-Whitney (Wilcoxon Rank Sum) MW-1509 0.2 MW-1509 background 0.16 ٩ MW-1509 compliance 0.12 background median = 0.13 mg/L 0.08 compliance median = 0.145 0.04 Z = 0.9982 (two-tail) Alpha 0.2 Table Sig. 1.282 No 0.1 No 1.96 No 0 0.02 2.326 No 6/14/16 5/25/19 5/17/20 5/11/21 6/7/17 5/31/18 2.576 No

Constituent: Fluoride, total Analysis Run 1/4/2022 1:08 PM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Mann-Whitney (Wilcoxon Rank Sum) MW-1510



Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

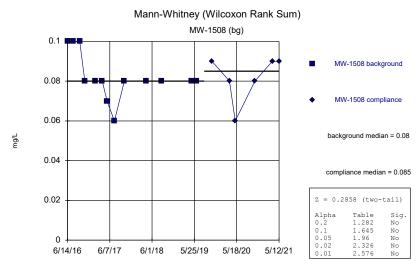


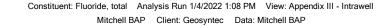
6/14/16 6/7/17 6/1/18 5/25/19 5/18/20 5/12/21

Constituent: Fluoride, total Analysis Run 1/4/2022 1:08 PM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

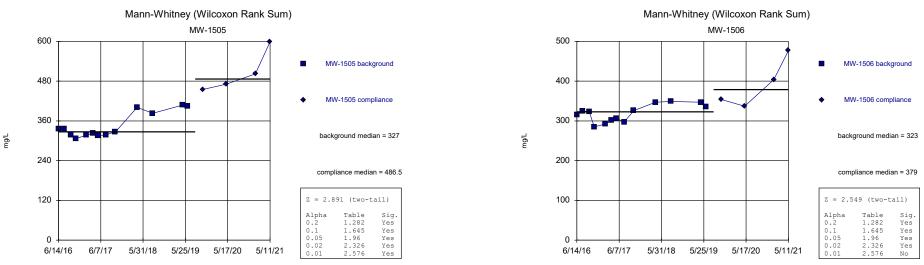
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Hollow symbols indicate censored values



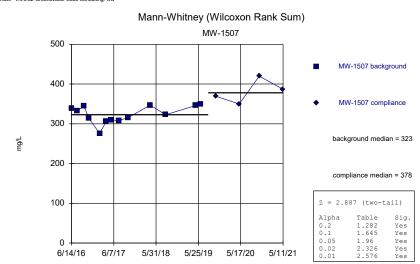






Constituent: Sulfate, total Analysis Run 1/4/2022 1:08 PM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP Constituent: Sulfate, total Analysis Run 1/4/2022 1:08 PM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG

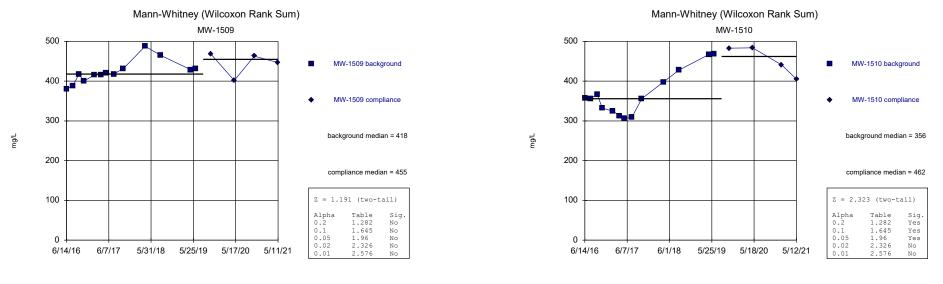


Mann-Whitney (Wilcoxon Rank Sum) MW-1508 (bg) 400 MW-1508 background 320 MW-1508 compliance 240 background median = 302 mg/L 160 compliance median = 283.5 80 Z = -1.757 (two-tail) Alpha Table Sig. 0.2 1.282 Yes 1.645 Yes 0.05 1.96 No 0 0.02 2.326 No 5/12/21 6/14/16 6/7/17 6/1/18 5/25/19 5/18/20 0.01 2.576 No

Constituent: Sulfate, total Analysis Run 1/4/2022 1:08 PM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG



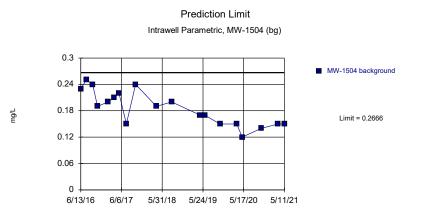
Constituent: Sulfate, total Analysis Run 1/4/2022 1:08 PM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP Constituent: Sulfate, total Analysis Run 1/4/2022 1:08 PM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Intrawell Prediction Limits - All Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/5/2022, 10:23 AM

Constituent	Well	Upper Lim.	Lower Lim	. <u>Date</u>	Observ.	<u>Sig.</u>	Bg N	<u>Bg Mean</u>	Std. Dev.	<u>%NDs</u>	ND Adj.	Transform	Alpha	Method
Fluoride, total (mg/L)	MW-1504	0.2666	n/a	n/a	1 future	n/a ʻ	19	0.1853	0.03907	0	None	No	0.001504	Param Intra 1 of 2
Fluoride, total (mg/L)	MW-1505	0.2	n/a	n/a	1 future	n/a ′	19	n/a	n/a	57.89	n/a	n/a	0.004832	NP Intra (NDs) 1 of 2
Fluoride, total (mg/L)	MW-1506	0.2	n/a	n/a	1 future	n/a ′	19	n/a	n/a	42.11	n/a	n/a	0.004832	NP Intra (normality) 1 of 2
Fluoride, total (mg/L)	MW-1507	0.2	n/a	n/a	1 future	n/a ′	19	n/a	n/a	5.263	n/a	n/a	0.004832	NP Intra (normality) 1 of 2
Fluoride, total (mg/L)	MW-1508	0.1057	n/a	n/a	1 future	n/a ʻ	19	0.08211	0.01134	0	None	No	0.001504	Param Intra 1 of 2
Fluoride, total (mg/L)	MW-1509	0.16	n/a	n/a	1 future	n/a ′	19	n/a	n/a	0	n/a	n/a	0.004832	NP Intra (normality) 1 of 2
Fluoride, total (mg/L)	MW-1510	0.125	n/a	n/a	1 future	n/a ʻ	19	0.2564	0.04669	15.79	Kaplan-Meier	sqrt(x)	0.001504	Param Intra 1 of 2
Sulfate, total (mg/L)	MW-1504	452.8	n/a	n/a	1 future	n/a ′	17	341.4	52.38	0	None	No	0.001504	Param Intra 1 of 2
Sulfate, total (mg/L)	MW-1505	408	n/a	n/a	1 future	n/a ′	13	n/a	n/a	0	n/a	n/a	0.009692	NP Intra (normality) 1 of 2
Sulfate, total (mg/L)	MW-1506	368.7	n/a	n/a	1 future	n/a ′	13	319.2	21.75	0	None	No	0.001504	Param Intra 1 of 2
Sulfate, total (mg/L)	MW-1507	373.2	n/a	n/a	1 future	n/a ′	13	323.9	21.63	0	None	No	0.001504	Param Intra 1 of 2
Sulfate, total (mg/L)	MW-1508	325.7	n/a	n/a	1 future	n/a ′	17	298.4	12.87	0	None	No	0.001504	Param Intra 1 of 2
Sulfate, total (mg/L)	MW-1509	491.5	n/a	n/a	1 future	n/a ′	17	428.4	29.69	0	None	No	0.001504	Param Intra 1 of 2
Sulfate, total (mg/L)	MW-1510	523.4	n/a	n/a	1 future	n/a ′	17	388.1	63.62	0	None	No	0.001504	Param Intra 1 of 2

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

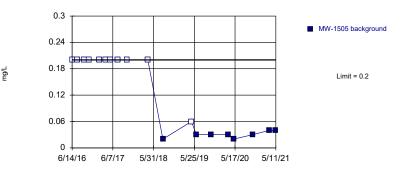


Background Data Summary: Mean=0.1853, Std. Dev.=0.03907, n=19. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9383, critical = 0.863. Kappa = 2.081 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Fluoride, total Analysis Run 1/5/2022 10:22 AM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Prediction Limit

Intrawell Non-parametric, MW-1505

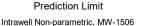


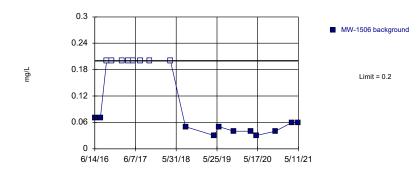
Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 19 background values. 57.89% NDs. Well-constituent pair annual alpha = 0.009641. Individual comparison alpha = 0.00482 (1 of 2). Assumes 1 future value.

Constituent: Fluoride, total Analysis Run 1/5/2022 10:22 AM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Prediction Limit

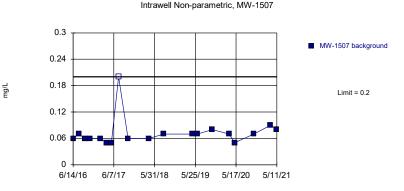
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.



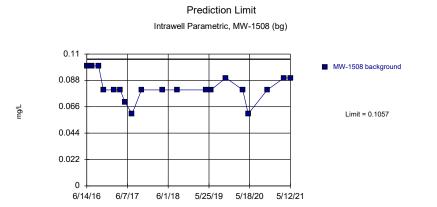


Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 19 background values. 42.11% NDs. Well-constituent pair annual alpha = 0.009641. Individual comparison alpha = 0.004832 (1 of 2). Assumes 1 future value.

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 19 background values. 5.263% NDs. Well-constituent pair annual alpha = 0.009641. Individual comparison alpha = 0.004832 (1 of 2). Assumes 1 future value.



Background Data Summary: Mean=0.08211, Std. Dev.=0.01134, n=19. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8672, critical = 0.863. Kappa = 2.081 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value. 0.2 0.16 0.12 0.08 0.04 0 6/14/16 6/7/17 5/31/18 5/25/19 5/17/20 5/11/21

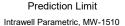
Prediction Limit

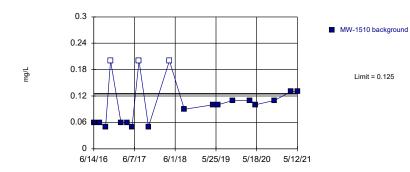
Intrawell Non-parametric, MW-1509

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 19 background values. Well-constituent pair annual alpha = 0.009641. Individual comparison alpha = 0.004832 (1 of 2). Assumes 1 future value.

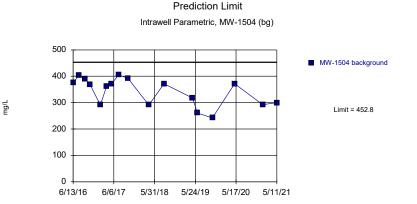
Constituent: Fluoride, total Analysis Run 1/5/2022 10:22 AM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP Constituent: Fluoride, total Analysis Run 1/5/2022 10:22 AM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.



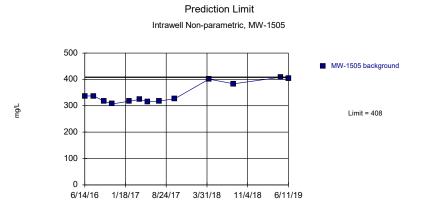


Background Data Summary (based on square root transformation) (after Kaplan-Meier Adjustment): Mean=0.2564, Std. Dev.=0.04669, n=19, 15.79% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8848, critical = 0.863. Kappa = 2.081 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value. Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

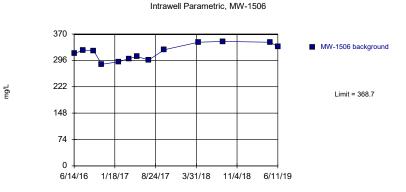


Background Data Summary: Mean=341.4, Std. Dev.=52.38, n=17. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8888, critical = 0.851. Kappa = 2.127 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Fluoride, total Analysis Run 1/5/2022 10:22 AM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP Constituent: Sulfate, total Analysis Run 1/5/2022 10:22 AM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 13 background values. Well-constituent pair annual alpha = 0.01929. Individual comparison alpha = 0.009692 (1 of 2). Assumes 1 future value.

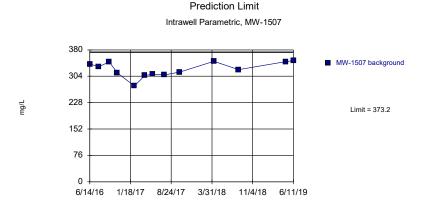


Prediction Limit

Background Data Summary: Mean=319.2, Std. Dev.=21.75, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9405, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Sulfate, total Analysis Run 1/5/2022 10:22 AM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP Constituent: Sulfate, total Analysis Run 1/5/2022 10:22 AM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

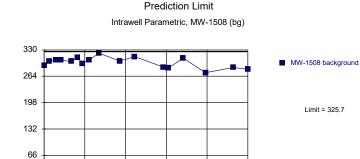


Background Data Summary: Mean=323.9, Std. Dev.=21.63, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9109, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

0

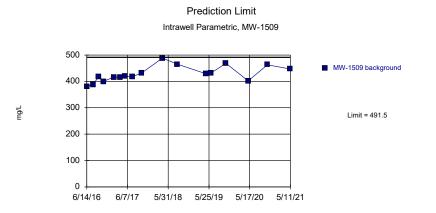
mg/L



6/14/16 6/7/17 6/1/18 5/25/19 5/18/20 5/12/21

Background Data Summary: Mean=298.4, Std. Dev.=12.87, n=17. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9729, critical = 0.851. Kappa = 2.127 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

mg/L



Background Data Summary: Mean=428.4, Std. Dev.=29.69, n=17. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9605, critical = 0.0851. Kappa = 2.127 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Prediction Limit

Intrawell Parametric, MW-1510

Background Data Summary: Mean=388.1, Std. Dev.=63.62, n=17. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9067, critical = 0.051. Kappa = 2.127 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Sulfate, total Analysis Run 1/5/2022 10:22 AM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP Constituent: Sulfate, total Analysis Run 1/5/2022 10:22 AM View: Appendix III - Intrawell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Upgradient Wells Trend Tests - Significant Results

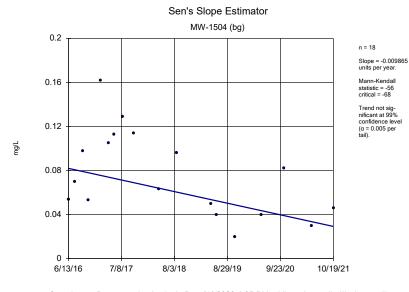
Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/4/2022, 1:06 PM

Constituent	Well	Slope	Calc.	<u>Critical</u>	<u>Sig.</u>	<u>N</u>	%ND	s Normality	Xform	<u>Alpha</u>	Method
Chloride, total (mg/L)	MW-1508 (bg)	-16.34	-121	-68	Yes	18	0	n/a	n/a	0.01	NP
pH, field (SU)	MW-1504 (bg)	0.1263	100	81	Yes	20	0	n/a	n/a	0.01	NP
pH, field (SU)	MW-1508 (bg)	0.07415	102	81	Yes	20	0	n/a	n/a	0.01	NP
Total Dissolved Solids [TDS] (mg/L)	MW-1508 (bg)	-31.01	-81	-68	Yes	18	0	n/a	n/a	0.01	NP

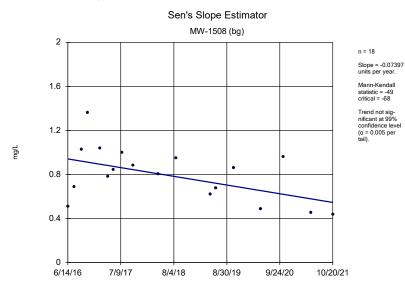
Upgradient Wells Trend Tests - All Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/4/2022, 1:06 PM

Constituent	Well	Slope	Calc.	Critical	<u>Sig.</u>	<u>N</u>	<u>%NDs</u>	Normality	<u>Xform</u>	Alpha	Method
Boron, total (mg/L)	MW-1504 (bg)	-0.009865	-56	-68	No	18	0	n/a	n/a	0.01	NP
Boron, total (mg/L)	MW-1508 (bg)	-0.07397	-49	-68	No	18	0	n/a	n/a	0.01	NP
Calcium, total (mg/L)	MW-1504 (bg)	0	4	68	No	18	0	n/a	n/a	0.01	NP
Calcium, total (mg/L)	MW-1508 (bg)	-4.975	-60	-68	No	18	0	n/a	n/a	0.01	NP
Chloride, total (mg/L)	MW-1504 (bg)	0	-1	-68	No	18	0	n/a	n/a	0.01	NP
Chloride, total (mg/L)	MW-1508 (bg)	-16.34	-121	-68	Yes	18	0	n/a	n/a	0.01	NP
pH, field (SU)	MW-1504 (bg)	0.1263	100	81	Yes	20	0	n/a	n/a	0.01	NP
pH, field (SU)	MW-1508 (bg)	0.07415	102	81	Yes	20	0	n/a	n/a	0.01	NP
Total Dissolved Solids [TDS] (mg/L)	MW-1504 (bg)	-3.899	-3	-68	No	18	0	n/a	n/a	0.01	NP
Total Dissolved Solids [TDS] (mg/L)	MW-1508 (bg)	-31.01	-81	-68	Yes	18	0	n/a	n/a	0.01	NP

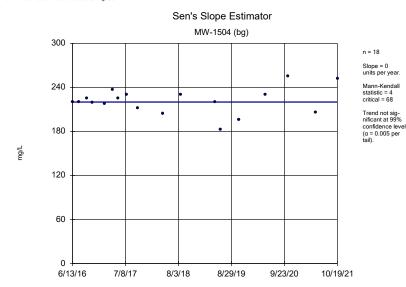


Constituent: Boron, total Analysis Run 1/4/2022 1:05 PM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP



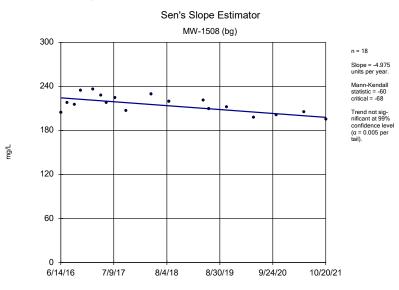
Constituent: Boron, total Analysis Run 1/4/2022 1:05 PM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

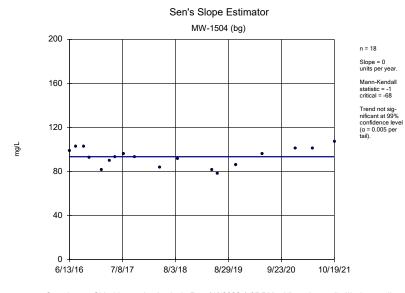


Constituent: Calcium, total Analysis Run 1/4/2022 1:05 PM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

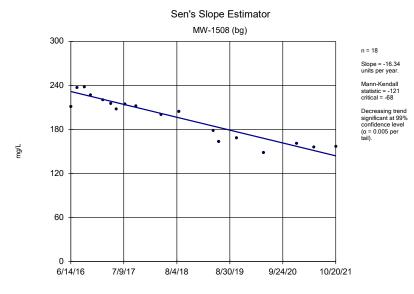




Constituent: Calcium, total Analysis Run 1/4/2022 1:05 PM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

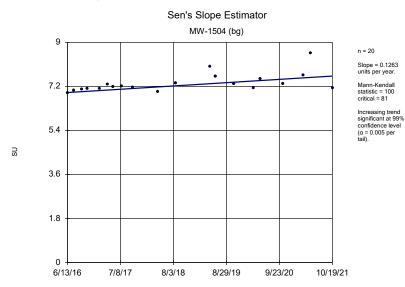


Constituent: Chloride, total Analysis Run 1/4/2022 1:05 PM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP



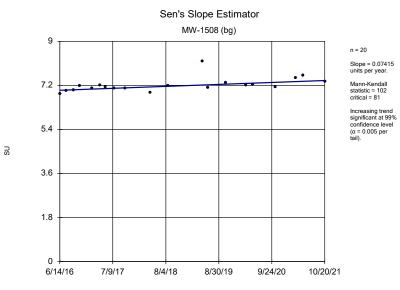
Constituent: Chloride, total Analysis Run 1/4/2022 1:05 PM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



Constituent: pH, field Analysis Run 1/4/2022 1:05 PM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

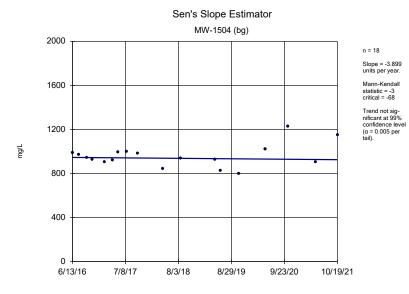




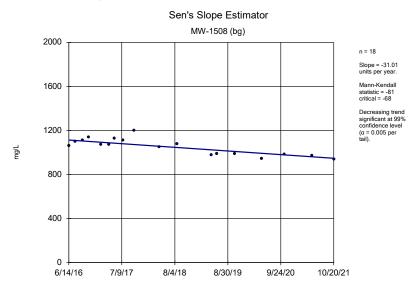
Constituent: pH, field Analysis Run 1/4/2022 1:05 PM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



Constituent: Total Dissolved Solids [TDS] Analysis Run 1/4/2022 1:05 PM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

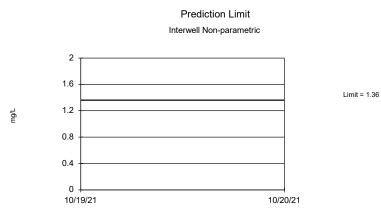


Constituent: Total Dissolved Solids [TDS] Analysis Run 1/4/2022 1:05 PM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Interwell Prediction Limits - All Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/5/2022, 10:25 AM

Constituent	Well	Upper Li	m. Lower L	.im. Date	Observ.	<u>Sig.</u> Bg	N Bg Mean	Std. Dev.	<u>%NDs</u>	ND Adj.	Transfor	rm <u>Alpha</u>	Method
Boron, total (mg/L)	n/a	1.36	n/a	n/a	5 future	n/a 36	n/a	n/a	0	n/a	n/a	0.001394	NP Inter (normality) 1 of 2
Calcium, total (mg/L)	n/a	247.4	n/a	n/a	5 future	n/a 36	218.2	15.3	0	None	No	0.001504	Param Inter 1 of 2
Chloride, total (mg/L)	n/a	238	n/a	n/a	5 future	n/a 36	n/a	n/a	0	n/a	n/a	0.001394	NP Inter (normality) 1 of 2
pH, field (SU)	n/a	8.56	6.86	n/a	5 future	n/a 40	n/a	n/a	0	n/a	n/a	0.002272	NP Inter (normality) 1 of 2
Total Dissolved Solids [TDS] (mg/L)	n/a	1197	n/a	n/a	5 future	n/a 36	1006	100.3	0	None	No	0.001504	Param Inter 1 of 2



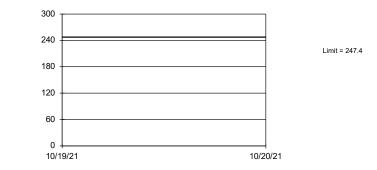
Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 36 background values. Annual per-constituent alpha = 0.001385. Individual comparison alpha = 0.001394 (1 of 2). Assumes 5 future values.

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

mg/L

Prediction Limit

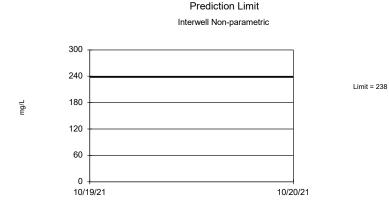
Interwell Parametric



Background Data Summary: Mean=218.2, Std. Dev.=15.3, n=36. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9818, critical = 0.912. Kappa = 1.906 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.007498. Individual comparison alpha = 0.001504. Assumes 5 future values.

Constituent: Boron, total Analysis Run 1/5/2022 10:24 AM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP Constituent: Calcium, total Analysis Run 1/5/2022 10:24 AM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

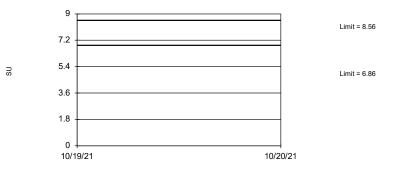
Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG



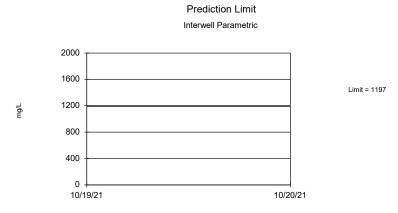
Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 36 background values. Annual per-constituent alpha = 0.01385. Individual comparison alpha = 0.001394 (1 of 2). Assumes 5 future values. Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Prediction Limit





Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limits are highest and lowest of 40 background values. Annual perconstituent alpha = 0.0226. Individual comparison alpha = 0.002272 (1 of 2). Assumes 5 future values.



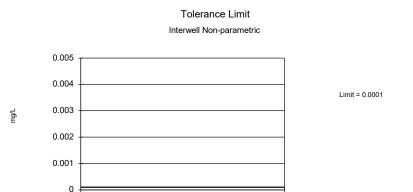
Background Data Summary: Mean=1006, Std. Dev.=100.3, n=36. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9753, critical = 0.912. Kappa = 1.906 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.007498. Individual comparison alpha = 0.001504. Assumes 5 future values.

Constituent: Total Dissolved Solids [TDS] Analysis Run 1/5/2022 10:24 AM View: Appendix III - Interwell Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Upper Tolerance Limits - Summary Table

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/4/2022, 1:48 PM

Constituent	Well	Upper Lim.	Date	Observ.	<u>Sig. Bg N</u>	Bg Mean	Std. Dev.	<u>%NDs</u>	<u>ND Adj.</u>	<u>Transform</u>	<u>Alpha</u>	Method
Antimony, total (mg/L)	n/a	0.0001	n/a	n/a	n/a 38	n/a	n/a	42.11	n/a	n/a	0.1424	NP Inter(normality)
Arsenic, total (mg/L)	n/a	0.00165	n/a	n/a	n/a 38	n/a	n/a	0	n/a	n/a	0.1424	NP Inter(normality)
Barium, total (mg/L)	n/a	0.05341	n/a	n/a	n/a 38	0.04021	0.006162	0	None	No	0.05	Inter
Beryllium, total (mg/L)	n/a	0.00006	n/a	n/a	n/a 38	n/a	n/a	60.53	n/a	n/a	0.1424	NP Inter(NDs)
Cadmium, total (mg/L)	n/a	0.00009	n/a	n/a	n/a 38	n/a	n/a	2.632	n/a	n/a	0.1424	NP Inter(normality)
Chromium, total (mg/L)	n/a	0.001974	n/a	n/a	n/a 38	0.02449	0.009309	0	None	sqrt(x)	0.05	Inter
Cobalt, total (mg/L)	n/a	0.002894	n/a	n/a	n/a 38	0.07386	0.03205	0	None	x^(1/3)	0.05	Inter
Combined Radium 226 + 228 (pCi/L)	n/a	1.945	n/a	n/a	n/a 37	0.7173	0.3151	0	None	sqrt(x)	0.05	Inter
Fluoride, total (mg/L)	n/a	0.25	n/a	n/a	n/a 40	n/a	n/a	0	n/a	n/a	0.1285	NP Inter(normality)
Lead, total (mg/L)	n/a	0.004765	n/a	n/a	n/a 38	-8.756	1.592	21.05	Kaplan-Meier	ln(x)	0.05	Inter
Lithium, total (mg/L)	n/a	0.03	n/a	n/a	n/a 38	n/a	n/a	15.79	n/a	n/a	0.1424	NP Inter(normality)
Mercury, total (mg/L)	n/a	0.000008	n/a	n/a	n/a 38	n/a	n/a	81.58	n/a	n/a	0.1424	NP Inter(NDs)
Molybdenum, total (mg/L)	n/a	0.001815	n/a	n/a	n/a 38	-7.492	0.5513	23.68	Kaplan-Meier	ln(x)	0.05	Inter
Selenium, total (mg/L)	n/a	0.006464	n/a	n/a	n/a 38	-8.078	1.417	10.53	None	ln(x)	0.05	Inter
Thallium, total (mg/L)	n/a	0.0002	n/a	n/a	n/a 38	n/a	n/a	50	n/a	n/a	0.1424	NP Inter(normality)



Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 38 background values. 42.11% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1424.

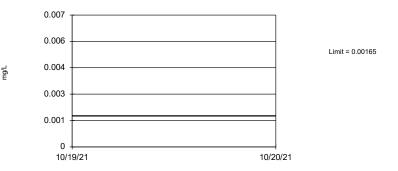
10/20/21

Constituent: Antimony, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Tolerance Limit



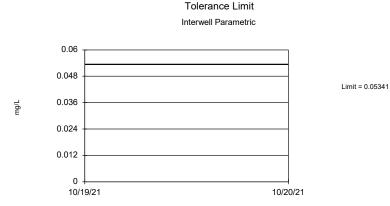


Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 38 background values. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.5. Report alpha = 0.1424.

Constituent: Arsenic, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG

10/19/21

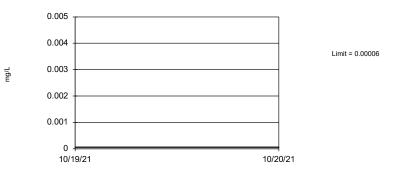


95% coverage. Background Data Summary: Mean=0.04021, Std. Dev.=0.006162, n=38. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9342, critical = 0.916. Report alpha = 0.05.

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Tolerance Limit

Interwell Non-parametric

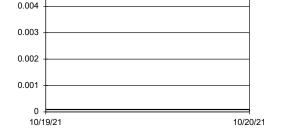


Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Limit is highest of 38 background values. 60.53% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.5. Report alpha = 0.1424.

ng/L

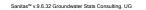
0.005

Tolerance Limit Interwell Non-parametric



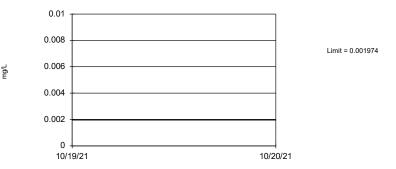
Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 38 background values. 2.632% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1424.

Constituent: Cadmium, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP





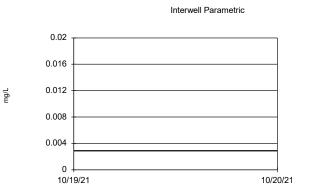
Interwell Parametric

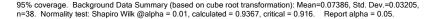


95% coverage. Background Data Summary (based on square root transformation): Mean=0.02449, Std. Dev.=0.009309, n=38. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9398, critical = 0.916. Report alpha = 0.05.

Constituent: Chromium, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP

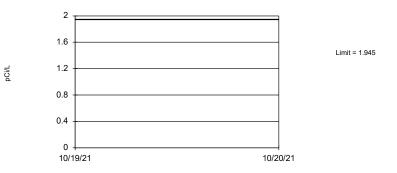
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG





Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



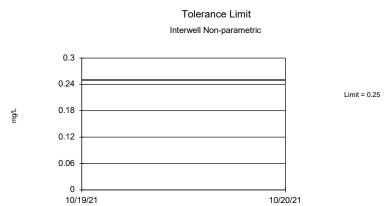


95% coverage. Background Data Summary (based on square root transformation): Mean=0.7173, Std. Dev.=0.3151, n=37. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9572, critical = 0.914. Report alpha = 0.05.

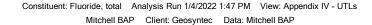




Limit = 0.00009



Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 40 background values. 89.26% coverage at alpha=0.01; 92.77% coverage at alpha=0.5. Report alpha = 0.1285.

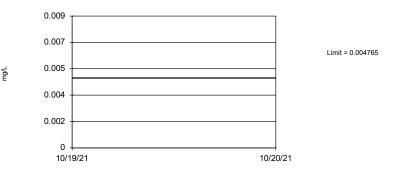


Tolerance Limit





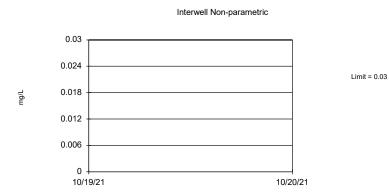
Interwell Parametric



95% coverage. Background Data Summary (based on natural log transformation) (after Kaplan-Meier Adjustment): Mean=-8.756, Std. Dev.=1.592, n=38, 21.05% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9382, critical = 0.916. Report alpha = 0.05.

> Constituent: Lead, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP

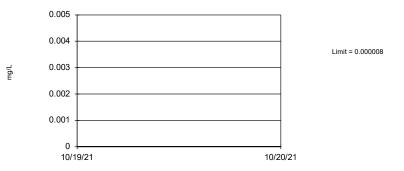
Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG



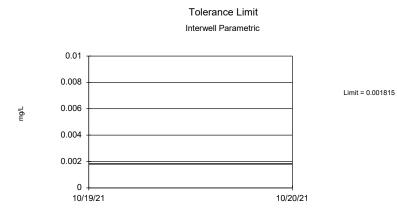
Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 38 background values. 15.79% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1424. Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Tolerance Limit

Interwell Non-parametric



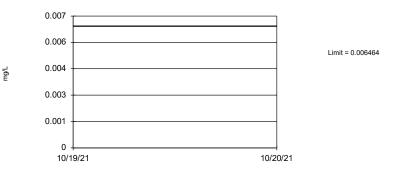
Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Limit is highest of 38 background values. 81.58% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1424.



95% coverage. Background Data Summary (based on natural log transformation) (after Kaplan-Meier Adjustment): Mean=7.492, Std. Dev.=0.5513, n=38, 23.68% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9276, critical = 0.916. Report lapha = 0.05. Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



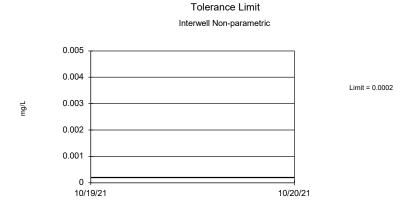
Interwell Parametric



95% coverage. Background Data Summary (based on natural log transformation): Mean=-8.078, Std. Dev.=1.417, n=38, 10.53% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9316, critical = 0.916. Report alpha = 0.05.

Constituent: Molybdenum, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP Constituent: Selenium, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 38 background values. 50% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha= 1.0424.

l N	IITCHELL BAP G	WPS		
	Compliance	CCR-Rule	Background	
Constituent Name	Limit	Specified	Limit	GWPS
Antimony, Total (mg/L)	0.006		0.0001	0.006
Arsenic, Total (mg/L)	0.01		0.0017	0.01
Barium, Total (mg/L)	2		0.053	2
Beryllium, Total (mg/L)	0.004		0.00006	0.004
Cadmium, Total (mg/L)	0.005		0.00009	0.005
Chromium, Total (mg/L)	0.1		0.002	0.1
Cobalt, Total (mg/L)	n/a	0.006	0.0029	0.006
Combined Radium, Total (pCi/L)	5		1.95	5
Fluoride, Total (mg/L)	4		0.25	4
Lead, Total (mg/L)	n/a	0.015	0.0048	0.015
Lithium, Total (mg/L)	n/a	0.04	0.03	0.04
Mercury, Total (mg/L)	0.002		0.000008	0.002
Molybdenum, Total (mg/L)	n/a	0.1	0.0018	0.1
Selenium, Total (mg/L)	0.05		0.0065	0.05
Thallium, Total (mg/L)	0.002		0.0002	0.002

*GWPS = Groundwater Protection Standard

*MCL = Maximum Contaminant Level

*CCR = Coal Combustion Residual

Confidence Intervals - All Results (No Significant)

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/4/2022, 2:08 PM

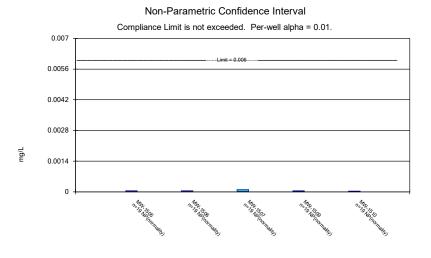
		Witcher	DAI Olient.	Geosyntee	Dai	.a. IV		nineu 1/4/2022, 2.0					
Constituent	Well	Upper Lim.	Lower Lim.	Compliance	<u>Sig.</u>	N	Mean	Std. Dev.	<u>%NDs</u>	<u>ND Adj.</u>	Transform	<u>Alpha</u>	Method
Antimony, total (mg/L)	MW-1505	0.00005	0.00003	0.006	No	19	0.00004263	0.00002023	10.53	None	No	0.01	NP (normality)
Antimony, total (mg/L)	MW-1506	0.00005	0.00003	0.006	No	19	0.00004526	0.00003533	5.263	None	No	0.01	NP (normality)
Antimony, total (mg/L)	MW-1507	0.0001	0.00003	0.006	No	19	0.00006	0.00003162	5.263	None	No	0.01	NP (normality)
Antimony, total (mg/L)	MW-1509	0.00005	0.00002	0.006	No	19	0.00003316	0.00001493	5.263	None	No	0.01	NP (normality)
Antimony, total (mg/L)	MW-1510	0.00003	0.00002	0.006	No	19	0.00002579	0.000009612	10.53	None	No	0.01	NP (normality)
Arsenic, total (mg/L)	MW-1505	0.00116	0.00031	0.01	No	19	0.0007768	0.0008654	0	None	No	0.01	NP (normality)
Arsenic, total (mg/L)	MW-1506	0.0008186	0.0004169	0.01	No	19	0.0006474	0.0003836	0	None	sqrt(x)	0.01	Param.
Arsenic, total (mg/L)	MW-1507	0.00219	0.00042	0.01	No	19	0.001394	0.001361	0	None	No	0.01	NP (normality)
Arsenic, total (mg/L)	MW-1509	0.0004682	0.0003408	0.01	No	19	0.0004089	0.0001139	0	None	sqrt(x)	0.01	Param.
Arsenic, total (mg/L)	MW-1510	0.0004925	0.0003221	0.01	No	19	0.0004153	0.0001532	0	None	sqrt(x)	0.01	Param.
Barium, total (mg/L)	MW-1505	0.0517	0.0455	2	No	19	0.05009	0.009145	0	None	No	0.01	NP (normality)
Barium, total (mg/L)	MW-1506	0.05981	0.05146	2	No	19	0.05563	0.007131	0	None	No	0.01	Param.
Barium, total (mg/L)	MW-1507	0.07413	0.0553	2	No	19	0.06605	0.01784	0	None	ln(x)	0.01	Param.
Barium, total (mg/L)	MW-1509	0.05777	0.04782	2	No	19	0.05279	0.008504	0	None	No	0.01	Param.
Barium, total (mg/L)	MW-1510	0.04366	0.03674	2	No	19	0.0402	0.005909	0	None	No	0.01	Param.
Beryllium, total (mg/L)	MW-1505	0.000091	0.00001	0.004	No	19	0.000044	0.00003405	47.37	None	No	0.01	NP (normality)
Beryllium, total (mg/L)	MW-1506	0.00005	0.00001	0.004	No	19	0.00003126	0.00001788	36.84	None	No	0.01	NP (normality)
Beryllium, total (mg/L)	MW-1507	0.00008378	0.00002526	0.004	No	19	0.00006705	0.00005521	31.58	Kaplan-Meier	sqrt(x)	0.01	Param.
Beryllium, total (mg/L)	MW-1509	0.00005	0.00001	0.004	No	19	0.00003695	0.00001977	68.42	Kaplan-Meier	No	0.01	NP (NDs)
Beryllium, total (mg/L)	MW-1510	0.00005	0.00001	0.004	No	19	0.00003289	0.00001894	52.63	Kaplan-Meier	No	0.01	NP (NDs)
Cadmium, total (mg/L)	MW-1505	0.00005	0.000025	0.005	No	19	0.00002868	0.000006634	0	None	No	0.01	NP (normality)
Cadmium, total (mg/L)	MW-1506	0.000022	0.00001	0.005	No	19	0.00002168	0.000008334	0	None	No	0.01	NP (normality)
Cadmium, total (mg/L)	MW-1507	0.00006	0.00003	0.005	No	19	0.00004079	0.0000153	0	None	No	0.01	NP (normality)
Cadmium, total (mg/L)	MW-1509	0.000025	0.00001	0.005	No	19	0.00001653	0.000006971	15.79	None	No	0.01	NP (normality)
Cadmium, total (mg/L)	MW-1510	0.000025	0.000005	0.005	No	19	0.00001247	0.000008922	31.58	None	No	0.01	NP (normality)
Chromium, total (mg/L)	MW-1505	0.00707	0.00045	0.1	No	18	0.002952	0.003768	0	None	No	0.01	NP (normality)
Chromium, total (mg/L)	MW-1506	0.00315	0.000592	0.1	No	19	0.001689	0.00135	0	None	No	0.01	NP (normality)
Chromium, total (mg/L)	MW-1507	0.008706	0.002241	0.1	No	19	0.006795	0.006688	0	None	x^(1/3)	0.01	Param.
Chromium, total (mg/L)	MW-1509	0.00147	0.000552	0.1	No	19	0.00115	0.001013	0	None	No	0.01	NP (normality)
Chromium, total (mg/L)	MW-1510	0.00234	0.000655	0.1		18	0.001727	0.001728	0	None	No	0.01	NP (normality)
Cobalt, total (mg/L)	MW-1505	0.0005753	0.0001881	0.006			0.0005384	0.0006631	0	None	ln(x)	0.01	Param.
Cobalt, total (mg/L)	MW-1506	0.0007008	0.0003279	0.006	No		0.0005144	0.0003184	0	None	No	0.01	Param.
Cobalt, total (mg/L)	MW-1507	0.001571	0.0004647	0.006	No		0.001398	0.001386	0	None	ln(x)	0.01	Param.
Cobalt, total (mg/L)	MW-1509	0.0002912	0.0001488	0.006			0.0002305	0.0001322	0	None	sqrt(x)	0.01	Param.
Cobalt, total (mg/L)	MW-1510	0.0002435	0.0001364	0.006		19	0.0001899	0.00009152	0	None	No	0.01	Param.
Combined Radium 226 + 228 (pCi/L)	MW-1505	1.045	0.5133	5	No		0.7793	0.4544	0	None	No	0.01	Param.
Combined Radium 226 + 228 (pCi/L)	MW-1506	1.096	0.4454	5	No		0.7707	0.5556	0	None	No	0.01	Param.
Combined Radium 226 + 228 (pCi/L)	MW-1507	1.333	0.6267	5	No		0.9801	0.5841	0	None	No	0.01	Param.
Combined Radium 226 + 228 (pCi/L)	MW-1509	1.239	0.5874	5			0.9662	0.6118	0	None	sqrt(x)	0.01	Param.
Combined Radium 226 + 228 (pCi/L)	MW-1510	0.92	0.4639	5			0.692	0.3769	0	None	No	0.01	Param.
Fluoride, total (mg/L)	MW-1505	0.06	0.03	4	No		0.0465	0.01599	55	None	No	0.01	NP (NDs)
Fluoride, total (mg/L)	MW-1506	0.06	0.04	4		20	0.053	0.01218	40	None	No	0.01	NP (normality)
Fluoride, total (mg/L)	MW-1507	0.07146	0.05954	4	No		0.0655	0.0105	5	None	No	0.01	Param.
Fluoride, total (mg/L)	MW-1509	0.15	0.1	4			0.13	0.02428	0	None	No	0.01	NP (normality)
Fluoride, total (mg/L)	MW-1509	0.13	0.06	4		20	0.084	0.02428	15	None	No	0.01	NP (normality)
Lead, total (mg/L)	MW-1510	0.000697	0.000091	4		20 19	0.004	0.02963	15	None	No	0.01	NP (normality)
Lead, total (mg/L)		0.000697	0.0001908	0.015			0.000371	0.0003003	0			0.01	,
,	MW-1506 MW-1507	0.0004901		0.015			0.000371	0.0003003		None	sqrt(x)	0.01	Param. NP (normality)
Lead, total (mg/L)			0.000217						5.263		No		,
Lead, total (mg/L)	MW-1509	0.0001318	0.00004488	0.015			0.00009842	0.00007802	0	None	sqrt(x)	0.01	Param.
Lead, total (mg/L)	MW-1510	0.0001607	0.0000809	0.015	No	19	0.0001356	0.00008786	0	None	ln(x)	0.01	Param.

Confidence Intervals - All Results (No Significant)

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/4/2022, 2:08 PM

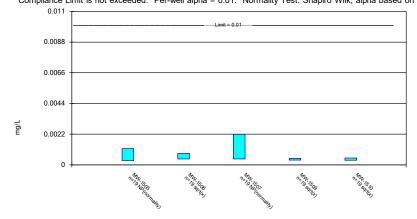
				- ,				, .					
Constituent	Well	Upper Lim.	Lower Lim.	Compliance	Sig.	N	Mean	Std. Dev.	<u>%NDs</u>	ND Adj.	<u>Transform</u>	<u>Alpha</u>	Method
Lithium, total (mg/L)	MW-1505	0.011	0.00527	0.04	No	19	0.008033	0.003591	5.263	None	No	0.01	NP (normality)
Lithium, total (mg/L)	MW-1506	0.01274	0.008469	0.04	No	19	0.01102	0.004011	5.263	None	ln(x)	0.01	Param.
Lithium, total (mg/L)	MW-1507	0.01474	0.009208	0.04	No	19	0.01226	0.005041	5.263	None	sqrt(x)	0.01	Param.
Lithium, total (mg/L)	MW-1509	0.01469	0.008667	0.04	No	19	0.01168	0.005139	5.263	None	No	0.01	Param.
Lithium, total (mg/L)	MW-1510	0.01267	0.007752	0.04	No	19	0.01021	0.004203	0	None	No	0.01	Param.
Mercury, total (mg/L)	MW-1505	0.000006	0.000002	0.002	No	19	0.000005158	0.000002141	78.95	None	No	0.01	NP (NDs)
Mercury, total (mg/L)	MW-1506	0.000005	0.000003	0.002	No	19	0.000004211	0.000001273	68.42	None	No	0.01	NP (NDs)
Mercury, total (mg/L)	MW-1507	0.000005773	0.000002392	0.002	No	19	0.000006842	0.000005449	36.84	Kaplan-Meier	ln(x)	0.01	Param.
Mercury, total (mg/L)	MW-1509	0.000005	0.000002	0.002	No	19	0.000004526	0.000001124	84.21	Kaplan-Meier	No	0.01	NP (NDs)
Mercury, total (mg/L)	MW-1510	0.000005	0.000002	0.002	No	19	0.000004842	6.9e-7	94.74	Kaplan-Meier	No	0.01	NP (NDs)
Molybdenum, total (mg/L)	MW-1505	0.001606	0.0005396	0.1	No	19	0.001492	0.001587	15.79	Kaplan-Meier	x^(1/3)	0.01	Param.
Molybdenum, total (mg/L)	MW-1506	0.001204	0.0006536	0.1	No	19	0.00098	0.0005289	0	None	x^(1/3)	0.01	Param.
Molybdenum, total (mg/L)	MW-1507	0.002997	0.0008614	0.1	No	19	0.002384	0.002925	5.263	None	x^(1/3)	0.01	Param.
Molybdenum, total (mg/L)	MW-1509	0.002	0.00032	0.1	No	19	0.0009868	0.0006873	26.32	None	No	0.01	NP (normality)
Molybdenum, total (mg/L)	MW-1510	0.000685	0.0003257	0.1	No	19	0.001111	0.0009072	31.58	Kaplan-Meier	ln(x)	0.01	Param.
Selenium, total (mg/L)	MW-1505	0.0005093	0.0001851	0.05	No	19	0.0003826	0.0002903	0	None	sqrt(x)	0.01	Param.
Selenium, total (mg/L)	MW-1506	0.00025	80000.0	0.05	No	19	0.0001458	0.00008329	31.58	None	No	0.01	NP (normality)
Selenium, total (mg/L)	MW-1507	0.0002052	0.0000586	0.05	No	19	0.0002374	0.0001913	15.79	Kaplan-Meier	sqrt(x)	0.01	Param.
Selenium, total (mg/L)	MW-1509	0.0002747	0.0001329	0.05	No	19	0.0002316	0.0001653	0	None	ln(x)	0.01	Param.
Selenium, total (mg/L)	MW-1510	0.00023	0.0001	0.05	No	19	0.0001779	0.00007561	0	None	No	0.01	NP (normality)
Thallium, total (mg/L)	MW-1505	0.0002	0.000067	0.002	No	19	0.0001355	0.00009935	31.58	None	No	0.01	NP (normality)
Thallium, total (mg/L)	MW-1506	0.0002	0.00005	0.002	No	19	0.0001089	0.00007178	36.84	None	No	0.01	NP (normality)
Thallium, total (mg/L)	MW-1507	0.0002	0.000051	0.002	No	19	0.0001201	0.0000712	42.11	None	No	0.01	NP (normality)
Thallium, total (mg/L)	MW-1509	0.0002	0.00003	0.002	No	19	0.0001146	0.00008354	47.37	None	No	0.01	NP (normality)
Thallium, total (mg/L)	MW-1510	0.0002	0.00002	0.002	No	19	0.0001167	0.00009085	52.63	None	No	0.01	NP (NDs)

Page 2



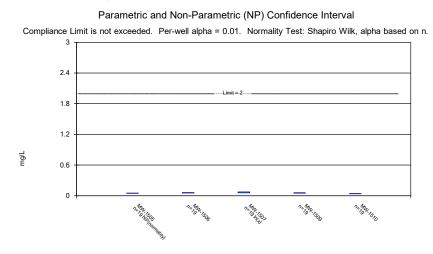
Constituent: Antimony, total Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Arsenic, total Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

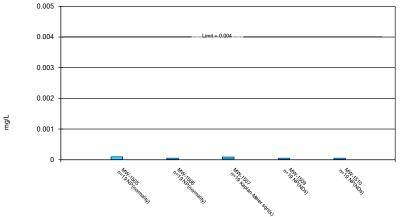
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



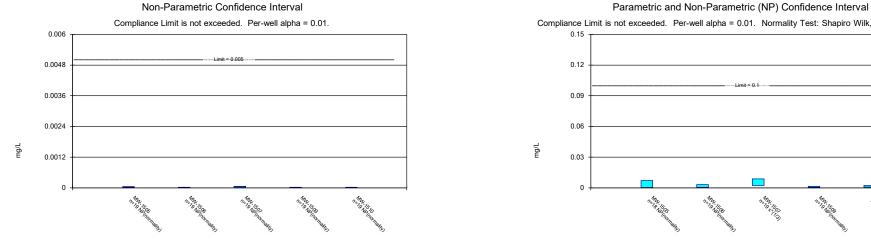
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

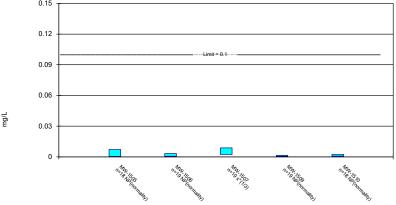


Constituent: Beryllium, total Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP



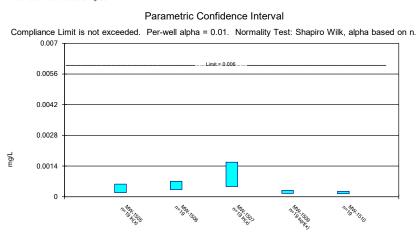
Constituent: Cadmium, total Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Chromium, total Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

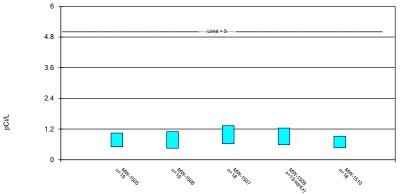
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Parametric Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



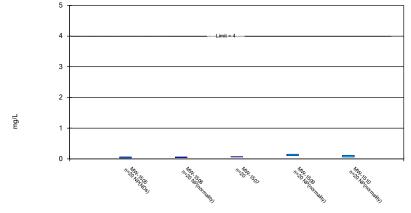
Constituent: Cobalt, total Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Constituent: Combined Radium 226 + 228 Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

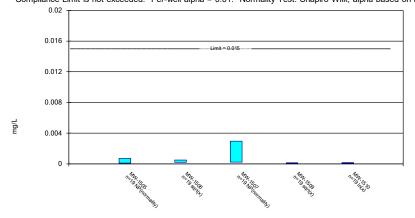
Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



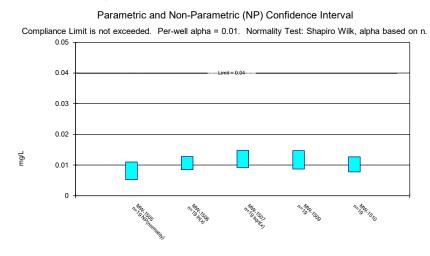
Constituent: Fluoride, total Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



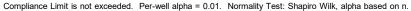
Constituent: Lead, total Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

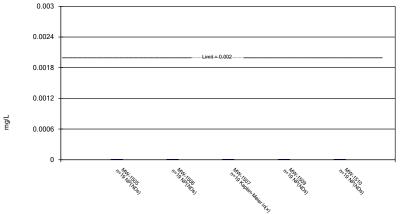
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval



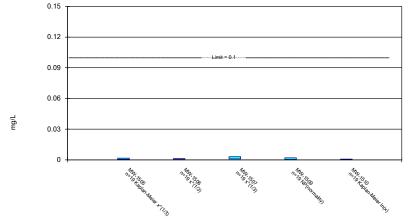


Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG

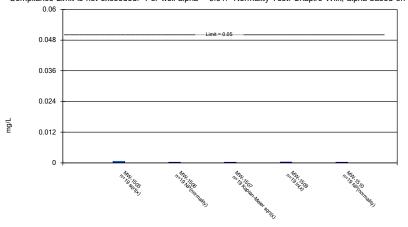
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

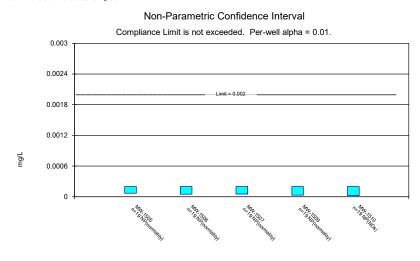


Constituent: Molybdenum, total Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP Parametric and Non-Parametric (NP) Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Selenium, total Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



Constituent: Thallium, total Analysis Run 1/4/2022 2:06 PM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

STATISTICAL ANALYSIS SUMMARY BOTTOM ASH POND Mitchell Plant Moundsville, West Virginia

Submitted to



1 Riverside Plaza Columbus, Ohio 43215-2372

Submitted by

Geosyntec Consultants

engineers | scientists | innovators

941 Chatham Lane Suite 103 Columbus, Ohio 43221

August 23, 2022

CHA8500B

TABLE OF CONTENTS

SECTION 1	Execut	ive Summary	1
SECTION 2	Bottom	Ash Pond Evaluation	2-1
2.1	Data V	alidation & QA/QC	2-1
2.2	Statisti	cal Analysis	2-1
	2.2.1	Evaluation of Potential Appendix IV SSLs	2-1
	2.2.2	Evaluation of Potential Appendix III SSIs	2-2
2.3	Conclu	isions	2-2
SECTION 3	Referen	nces	3-1

LIST OF TABLES

Table 1	Groundwater Data Summary
Table 2	Appendix IV Groundwater Protection Standards
Table 3	Appendix III Data Summary

LIST OF ATTACHMENTS

Attachment A	Certification by Qualified Professional Engineer
Attachment B	Statistical Analysis Output

LIST OF ACRONYMS AND ABBREVIATIONS

- AEP American Electric Power
- BAP Bottom Ash Pond
- CCR Coal Combustion Residuals
- CCV Continuing Calibration Verification
- CFR Code of Federal Regulations
- GWPS Groundwater Protection Standard
- LCL Lower Confidence Limit
- LFB Laboratory Fortified Blanks
- LPL Lower Prediction Limit
- LRB Laboratory Reagent Blanks
- MCL Maximum Contaminant Level
- NELAP National Environmental Laboratory Accreditation Program
- QA Quality Assurance
- QC Quality Control
- SSI Statistically Significant Increase
- SSL Statistically Significant Level
- TDS Total Dissolved Solids
- UPL Upper Prediction Limit
- USEPA United States Environmental Protection Agency

SECTION 1

EXECUTIVE SUMMARY

In accordance with the United States Environmental Protection Agency's (USEPA's) regulations regarding the disposal of coal combustion residuals (CCR) in landfills and surface impoundments (40 CFR 257.90-257.98, "CCR rule"), groundwater monitoring has been conducted at the Bottom Ash Pond (BAP), an existing CCR unit at the Mitchell Power Plant located in Moundsville, West Virginia. Recent groundwater monitoring results were compared to the site-specific groundwater protection standards (GWPSs) to identify potential exceedances.

Based on detection monitoring conducted in 2017 and 2018, statistically significant increases (SSIs) over background were concluded for boron, calcium, chloride, and total dissolved solids (TDS), at the BAP. An alternative source was not identified following the detection monitoring events; thus, the BAP has been in assessment monitoring since 2018. During the most recent assessment monitoring event, completed in October 2021, Appendix III detections of boron, calcium, chloride, sulfate, and TDS were observed above background levels and the unit remained in assessment monitoring (Geosyntec, 2022).

During 2022, an annual sampling event for Appendix IV parameters required by 257.95(b) was completed in March, and a semi-annual sampling event for Appendix III and Appendix IV parameters required by 257.95(d)(1) was completed in May. The results of these annual and semi-annual assessment monitoring events are documented in this report.

Prior to conducting the statistical analyses, the groundwater data underwent several validation tests, including those for completeness, sample tracking accuracy, transcription errors, and consistent use of measurement units. No data quality issues were identified which would impact the usability of the data.

The monitoring data were submitted to Groundwater Stats Consulting, LLC for statistical analysis. Confidence intervals were calculated for Appendix IV parameters at the compliance wells to assess whether any were present at concentrations above previously established GWPSs. No statistically significant levels (SSLs) were identified; however, concentrations of Appendix III parameters remained above background. Thus, the unit will remain in assessment monitoring. Certification of the selected statistical methods by a qualified professional engineer is documented in Attachment A.

SECTION 2

BOTTOM ASH POND EVALUATION

2.1 <u>Data Validation & QA/QC</u>

During the assessment monitoring program in 2022, two sets of samples were collected for analysis from each upgradient and downgradient well to meet the requirements of 40 CFR 257.95(b) (March 2022) and 257.95(d)(1) (May 2022). Samples from the May 2022 sample event were analyzed for all Appendix III and Appendix IV parameters, whereas samples from the March 2022 event the were analyzed for Appendix IV parameters only. A summary of data collected during these assessment monitoring events may be found in Table 1.

Chemical analysis was completed by an analytical laboratory certified by the National Environmental Laboratory Accreditation Program (NELAP). Quality assurance and quality control (QA/QC) samples completed by the analytical laboratory included the use of laboratory reagent blanks (LRBs), continuing calibration verification (CCV) samples, and laboratory fortified blanks (LFBs).

The analytical data were imported into a Microsoft Access database, where checks were completed to assess the accuracy of sample location identification and analyte identification. Where necessary, unit conversions were applied to standardize reported units across all sampling events. Exported data files were created for use with the SanitasTM v.9.6.35 statistics software. The export file was checked against the analytical data for transcription errors and completeness. No QA/QC issues were noted which would impact data usability.

2.2 <u>Statistical Analysis</u>

Statistical analyses for the BAP were conducted in accordance with the October 2020 *Statistical Analysis Plan* (Geosyntec, 2020). Time series plots and results for all completed statistical tests are provided in Attachment B.

The data obtained in March and May 2022 were screened for potential outliers; however, no outliers were identified in either set of data (Attachment B).

2.2.1 Evaluation of Potential Appendix IV SSLs

A confidence interval was constructed for each Appendix IV parameter at each compliance well. Confidence limits were generally calculated parametrically ($\alpha = 0.01$); however, non-parametric confidence limits were calculated in some cases (e.g., when the data were not normally distributed or when the non-detect frequency was too high). An SSL was concluded if the lower confidence limit (LCL) exceeded the GWPS (i.e., if the entire confidence interval exceeded the GWPS). Calculated confidence limits are shown in Attachment B. The calculated confidence limits were compared to the GWPSs provided in Table 2. The GWPSs were established during a previous statistical analysis as either the greater value of the background concentration or the maximum contaminant level (MCL) and risk-based level specified in 40 CFR 257.95(h)(2) (Geosyntec, 2022).

No SSLs were identified at the Mitchell BAP.

2.2.2 Evaluation of Potential Appendix III SSIs

The Appendix III results were analyzed to assess whether concentrations of Appendix III parameters at the compliance wells exceeded background concentrations. Data collected during the May 2022 assessment monitoring event from each compliance well were compared to previously established prediction limits to assess whether the results are above background values. The results from these events and the prediction limits are summarized in Table 3. The following exceedances of the upper prediction limits (UPLs) were noted:

- Boron concentrations exceeded the interwell UPL of 1.36 mg/L at MW-1505 (3.70 mg/L), MW-1506 (3.72 mg/L), MW-1507 (4.08 mg/L), MW-1509 (8.95 mg/L), and MW-1510 (5.04 mg/L).
- Calcium concentrations exceeded the interwell UPL of 247 mg/L at MW-1505 (323 mg/L), MW-1506 (283 mg/L), and MW-1507 (251 mg/L).
- Chloride concentrations exceeded the interwell UPL of 238 mg/L at MW-1509 (267 mg/L).
- pH values exceeded the interwell UPL of 8.6 SU at MW-1506 (8.9 SU).
- Sulfate concentrations exceeded the intrawell UPL of 408 mg/L at MW-1505 (927 mg/L), the intrawell UPL of 369 mg/L at MW-1506 (703 mg/L) and the intrawell UPL of 373 mg/L at MW-1507 (671 mg/L).
- TDS concentrations exceeded the interwell UPL of 1,200 mg/L at MW-1505 (1,770 mg/L), MW-1506 (1,450 mg/L), MW-1507 (1,500 mg/L), and MW-1509 (1,270 mg/L).

While the prediction limits were calculated for a one-of-two retesting procedure, SSIs were conservatively assumed if the May 2022 sample was above the UPL. Based on this evaluation, concentrations of Appendix III constituents appear to be above background concentrations and the unit will remain in assessment monitoring.

2.3 <u>Conclusions</u>

An annual and a semi-annual assessment monitoring event were conducted in accordance with the CCR Rule. The laboratory and field data were reviewed prior to statistical analysis, with no QA/QC issues identified that impacted data usability. A review of outliers identified no potential outliers in the March 2022 and May 2022 data. A confidence interval was constructed at each

compliance well for each Appendix IV parameter; SSLs were concluded if the entire confidence interval exceeded the GWPSs. No SSLs were identified.

The Appendix III results were evaluated to assess whether concentrations of Appendix III parameters exceeded background levels. Boron, calcium, chloride, pH, sulfate, and TDS results exceeded background levels at select downgradient wells. Based on this evaluation, the Mitchell BAP CCR unit will remain in assessment monitoring.

SECTION 3

REFERENCES

Geosyntec Consultants (Geosyntec). 2020. Statistical Analysis Plan – Mitchell Plant. October 2020.

Geosyntec. 2022. Statistical Analysis Summary – Bottom Ash Pond, Mitchell Plant, Moundsville, West Virginia. February 14, 2022.

TABLES

Table 1 - Groundwater Data SummaryMitchell Plant - Bottom Ash Pond

Demonster	Unit	MW	-1504	MW	-1505	MW	-1506	MW	-1507	MW	-1508	MW	-1509	MW	-1510
Parameter	Unit	3/15/2022	5/11/2022	3/15/2022	5/11/2022	3/15/2022	5/10/2022	3/15/2022	5/10/2022	3/15/2022	5/11/2022	3/15/2022	5/10/2022	3/15/2022	5/11/2022
Antimony	μg/L	0.1 U1	0.02 J1	0.03 J1	0.03 J1	0.03 J1	0.02 J1	0.03 J1	0.03 J1	0.1 U1	0.1 U1	0.03 J1	0.02 J1	0.02 J1	0.02 J1
Arsenic	μg/L	0.23	0.27	0.38	0.40	0.34	0.31	0.31	0.49	0.30	0.28	0.45	0.31	0.29	0.27
Barium	μg/L	40.0	38.1	35.5	33.5	41.2	42.5	44.0	45.0	28.7	30.7	43.3	36.7	26.5	25.8
Beryllium	μg/L	0.05 U1	0.05 U1	0.009 J1	0.05 U1	0.012 J1	0.05 U1	0.011 J1	0.012 J1	0.05 U1	0.05 U1	0.021 J1	0.05 U1	0.015 J1	0.05 U1
Boron	mg/L	-	0.026 J1	-	3.70	-	3.72	-	4.08	-	0.215	-	8.95	-	5.04
Cadmium	μg/L	0.018 J1	0.034	0.022	0.020	0.014 J1	0.012 J1	0.026	0.022	0.038	0.026	0.014 J1	0.009 J1	0.006 J1	0.004 J1
Calcium	mg/L	-	224 M1, P3	-	323	-	283	-	251	-	245	-	240	-	163
Chloride	mg/L	-	79.4	-	185	-	195	-	169	-	147	-	267	-	175
Chromium	μg/L	0.26	0.38	0.70	0.65	0.73	0.42	1.49	1.48	0.31	0.31	0.70	0.34	0.73	0.54
Cobalt	μg/L	0.031	0.334	0.286	0.245	0.344	0.183	0.357	0.330	0.219	0.162	0.422	0.129	0.127	0.119
Combined Radium	pCi/L	2.16	0.37	1.27	0.54	1.22	0.99	1.19	1.31	0.7	0.85	1.48	0.47	0.6	0.43
Fluoride	mg/L	0.13	0.12	0.06 U1	0.15 U1	0.04 J1	0.15 U1	0.04 J1	0.05 J1	0.09	0.06 J1	0.09	0.09 J1	0.13	0.1 J1
Lead	μg/L	0.05 J1	0.08 J1	0.14 J1	0.16 J1	0.14 J1	0.08 J1	0.10 J1	0.24	0.2 U1	0.2 U1	0.24	0.09 J1	0.12 J1	0.08 J1
Lithium	mg/L	0.00483	0.00461	0.00664	0.00676	0.00753	0.00764	0.00842	0.00831	0.00421	0.00432	0.0101	0.00952	0.00687	0.00616
Mercury	μg/L	0.005 U1	0.01 U1	0.005 U1	0.005 U1	0.005 U1	0.005 U1	0.005 U1	0.005 U1	0.005 U1	0.005 U1	0.002 J1	0.005 U1	0.003 J1	0.002 J1
Molybdenum	μg/L	0.2 J1	0.2 J1	0.4 J1	0.3 J1	1.3	0.4 J1	0.8	0.8	0.3 J1	0.3 J1	0.6	2.2	0.2 J1	0.2 J1
Selenium	μg/L	5.69	0.1 J1	2.41	2.76	0.13 J1	1.51	0.5 U1	4.44	0.1 J1	0.83	0.5 U1	1.03	0.59	0.60
Sulfate	mg/L	-	239	-	927	-	703	-	671	-	335	-	456	-	354
Thallium	μg/L	0.2 U1	0.2 U1	0.07 J1	0.06 J1	0.2 U1	0.2 U1	0.04 J1	0.2 U1	0.2 U1	0.2 U1				
Total Dissolved Solids	mg/L	-	810	-	1,770	-	1,450 S7, L1	-	1,500 L1	-	980	-	1,270 S7, L1	-	1,010
pН	SU	7.19	7.78	7.28	7.83	7.37	8.9	7.29	8.34	6.96	7.56	7.28	8.35	7.34	7.74

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U1: Not detected at or above the method detection limit. For statistical analysis, parameters which were not detected were replaced with the reporting limit.

J1: Concentration estimated. Parameter was detected between the method detection limit and the reporting limit.

M1: The associated matrix spike (MS) or matrix spike duplicate (MSD) recovery was outside acceptance limits.

P3: The precision on the matrix spike duplicate (MSD) was above acceptance limits.

S7: Sample did not achieve constant weight.

L1: The associated laboratory control sample (LCS) or laboratory control sample duplicate (LCSD) recovery was outside acceptance limits.

-: Not analyzed

Table 2 - Appendix IV Groundwater Protection Standards
Mitchell Plant - Bottom Ash Pond

Constituent Name	MCL	CCR Rule-Specified	Calculated UTL	GWPS
Antimony, Total (mg/L)	0.00600		0.000100	0.00600
Arsenic, Total (mg/L)	0.0100		0.00165	0.0100
Barium, Total (mg/L)	2.00		0.0534	2.00
Beryllium, Total (mg/L)	0.00400		0.0000600	0.00400
Cadmium, Total (mg/L)	0.00500		0.0000900	0.00500
Chromium, Total (mg/L)	0.100		0.00197	0.100
Cobalt, Total (mg/L)	n/a	0.00600	0.00289	0.00600
Combined Radium, Total (pCi/L)	5.00		1.95	5.00
Fluoride, Total (mg/L)	4.00		0.250	4.00
Lead, Total (mg/L)	n/a	0.0150	0.00477	0.0150
Lithium, Total (mg/L)	n/a	0.0400	0.0300	0.0400
Mercury, Total (mg/L)	0.00200		0.00000800	0.00200
Molybdenum, Total (mg/L)	n/a	0.100	0.00182	0.100
Selenium, Total (mg/L)	0.0500		0.00646	0.0500
Thallium, Total (mg/L)	0.00200		0.000200	0.00200

Notes:

MCL = Maximum Contaminant Level

CCR = Coal Combustion Residual

GWPS = Groundwater Protection Standard

Calculated UTL (Upper Tolerance Limit) represents site-specific background values.

Table 3 - Appendix III Data SummaryMitchell Plant - Bottom Ash Pond

Analyte	Unit	Description	MW-1505	MW-1506	MW-1507	MW-1509	MW-1510				
Allalyte	Omt	Description	5/11/2022	5/10/2022	5/10/2022	5/10/2022	5/11/2022				
Boron	mg/L	Interwell Background Value (UPL)	1.36								
DOIOII	mg/L	Analytical Result	3.70	3.72	4.08	8.95	5.04				
Calcium	mg/L	Interwell Background Value (UPL)			247						
Calciulii	mg/L	Analytical Result	323	283	251	240	163				
Chloride	mg/L	Interwell Background Value (UPL)	238								
Cilionde	mg/L	Analytical Result	185	195	169	267	175				
Fluoride	mg/L	Intrawell Background Value (UPL)	0.200	0.200	0.200	0.160	0.125				
Fluoride	mg/L	Analytical Result	0.05	0.05	0.05	0.09	0.1				
		Interwell Background Value (UPL)			8.6	-					
pН	SU	Interwell Background Value (LPL)			6.9						
		Analytical Result	7.8	8.9	8.3	8.4	7.7				
Sulfate	mg/L	Intrawell Background Value (UPL)	408	369	373	492	523				
Suitate	mg/L	Analytical Result	927	703	671	456	354				
Total Dissolved Solids	ma/I	Interwell Background Value (UPL)	1,200								
Total Dissolved Solids	mg/L	Analytical Result	1,770	1,450	1,500	1,270	1,010				

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

Bold values exceed the background value.

Background values are shaded gray.

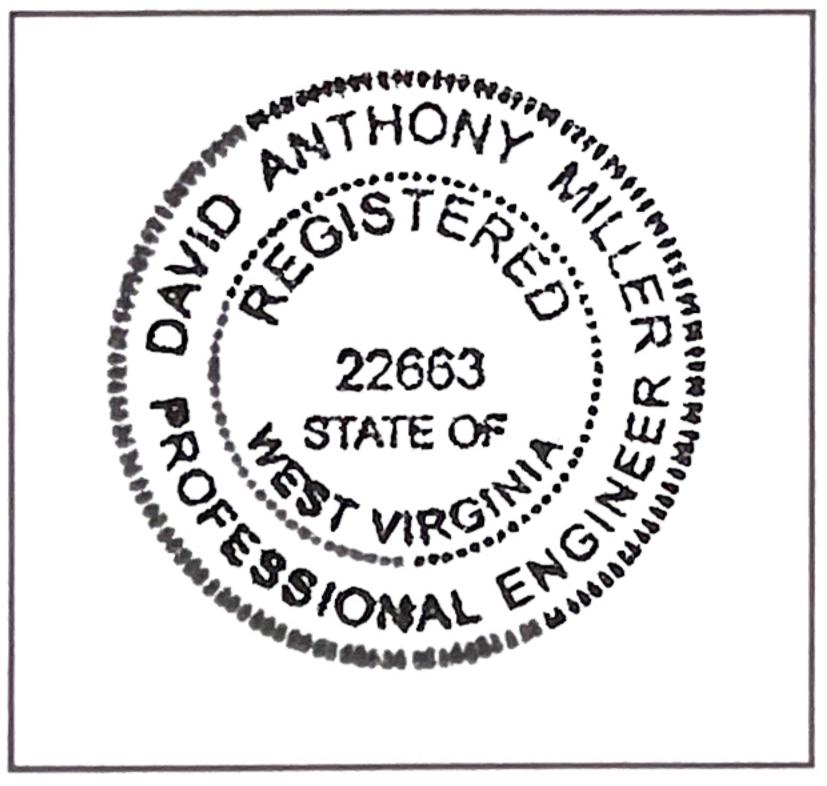
ATTACHMENT A Certification by Qualified Professional Engineer

Certification by Qualified Professional Engineer

I certify that the selected and above described statistical method is appropriate for evaluating the groundwater monitoring data for the Mitchell Bottom Ash Pond CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER

Printed Name of Licensed Professional Engineer



David Anthony Miller Signature

22663 License Number

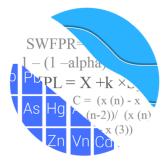
WEST VIRGINIA Licensing State

08.30.22

Date

ATTACHMENT B Statistical Analysis Output

GROUNDWATER STATS CONSULTING



August 23, 2022

Geosyntec Consultants Attn: Ms. Allison Kreinberg 941 Chatham Lane, #103 Columbus, OH 43221

RE: Mitchell Bottom Ash Pond (BAP) Assessment Monitoring Summary – March & May 2022

Dear Ms. Kreinberg,

Groundwater Stats Consulting (GSC), formerly the statistical consulting division of Sanitas Technologies, is pleased to provide the Assessment Monitoring statistical analysis of groundwater data for the March and May 2022 sample events for American Electric Power Company's Mitchell BAP. The analysis complies with the federal rule for the Disposal of Coal Combustion Residuals from Electric Utilities (CCR Rule, 2015) as well as with the United States Environmental Protection Agency (USEPA) Unified Guidance (2009).

Sampling at each of the wells below began at Mitchell Bottom Ash Pond for the CCR program in 2016. The monitoring well network, as provided by Geosyntec Consultants, consists of the following:

- **Upgradient wells:** MW-1504 and MW-1508
- o **Downgradient wells:** MW-1505, MW-1506, MW-1507, MW-1509, and MW-1510

Data were sent electronically, and the statistical analysis was conducted according to the Statistical Analysis Plan and screening evaluation prepared by GSC and approved by Dr. Kirk Cameron, PhD Statistician with MacStat Consulting, primary author of the USEPA Unified Guidance, and Senior Advisor to GSC. The analysis was reviewed by Kristina Rayner, Senior Statistician and Founder of GSC.

The CCR Assessment Monitoring program consists of the following constituents:

 Appendix IV (Assessment Monitoring) – antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, combined radium 226 + 228, fluoride, lead, lithium, mercury, molybdenum, selenium, and thallium

Time series graphs and box plots for Appendix IV parameters are provided for all wells and constituents; and are used to evaluate concentrations over the entire record as well as to view variation within and across wells (Figures A and B). All data were initially screened for outliers and trends in December 2017.

Summary of Statistical Methods – Appendix IV Parameters

Parametric tolerance limits are utilized when the screened historical data follow a normal or transformed-normal distribution. When data cannot be normalized or the majority of data are non-detects, a nonparametric test is utilized. The distribution of data is tested using the Shapiro-Wilk/Shapiro-Francia test for normality. After testing for normality and performing any adjustments as discussed below (USEPA, 2009), data are analyzed using either parametric or non-parametric tolerance limits as appropriate.

- No statistical analyses are required on wells and analytes containing 100% nondetects (USEPA Unified Guidance, 2009, Chapter 6).
- When data contain <15% non-detects in background, simple substitution of onehalf the reporting limit is utilized in the statistical analysis. The reporting limit utilized for non-detects is the most recent practical quantification limit (PQL) as reported by the laboratory.
- When data contain between 15-50% non-detects, the Kaplan-Meier non-detect adjustment is applied to the background data. This technique adjusts the mean and standard deviation of the historical concentrations to account for concentrations below the reporting limit.
- Nonparametric tolerance limits are used on data containing greater than 50% non-detects.

For all constituents, a substitution of the most recent reporting limit is used for non-detect data. In the time series plots, a single reporting limit substitution is used across all wells for a given parameter since the wells are plotted as a group. For calculating confidence intervals, the substitution is performed for individual wells and may differ across wells. This generally gives the most conservative limit in each case. Note that when there are no detections present in downgradient wells for a given constituent, statistical analyses are not required. All downgradient well/constituent pairs contained detected measurements

and were, therefore, analyzed in this report. If records contain 100% non-detects in future analyses, a summary of those well/constituent pairs will be provided.

Summary of Background Screening

Outlier Screening

Data were re-evaluated for outliers using Tukey's outlier test during the background update performed in January 2022, and a summary of those findings was submitted with that report. No additional values were flagged during that screening. Values identified as outliers are flagged in the database with "o" and are deselected prior to construction of statistical limits. A list of all previously flagged outliers follows this letter (Figure C). Additionally, flagged data are displayed in a lighter font and as a disconnected symbol on the time series reports, as well as in a lighter font on the accompanying data pages.

Evaluation of Appendix IV Parameters – March & May 2022

Interwell upper tolerance limits were used to calculate the site-specific background limits from pooled upgradient well data in the Fall 2021 analysis using upgradient well data through October 2021 for the Appendix IV constituents discussed above (Figure D). These limits are updated on an annual basis and will be updated again during the Fall 2022 sample event. Parametric tolerance limits are calculated, with a target of 95% confidence and 95% coverage, when data follow a normal or transformed-normal distribution such as for barium, chromium, cobalt, combined radium 226 + 228, lead, molybdenum, and selenium. When data contained greater than 50% non-detects or did not follow a normal or transformed-normal distribution, non-parametric tolerance limits were constructed using the highest background measurement. The confidence and coverage levels for nonparametric tolerance limits are dependent upon the number of background samples.

Groundwater Protection Standards

The upper tolerances limits were compared to the Maximum Contaminant Levels (MCLs) and the CCR-Rule specified levels in the Groundwater Protection Standards (GWPS) table following this letter to determine the highest limit for use as the GWPS in the Confidence Interval comparisons (Figure E).

Confidence Intervals

Confidence intervals were then constructed on downgradient wells using all available data through May 2022 for each of the Appendix IV parameters using the highest limit of either

the MCL, CCR-Rule specified, or background as the GWPS as discussed above (Figure F). Only when the entire confidence interval is above a GWPS is the well/constituent pair considered to exceed its respective standard. Complete graphical results of the confidence intervals follow this report and no confidence interval exceedances were noted for any of the Appendix IV parameters.

Thank you for the opportunity to assist you in the statistical analysis of groundwater quality for the Mitchell BAP. If you have any questions or comments, please feel free to contact us.

For Groundwater Stats Consulting,

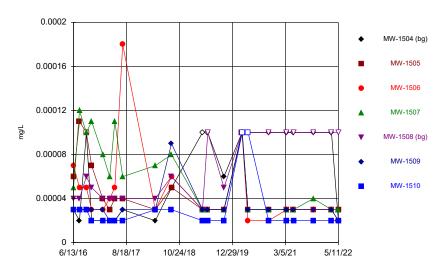
Andrew T. Collins Project Manager

Kristina Rayner

Kristina L. Rayner Senior Statistician

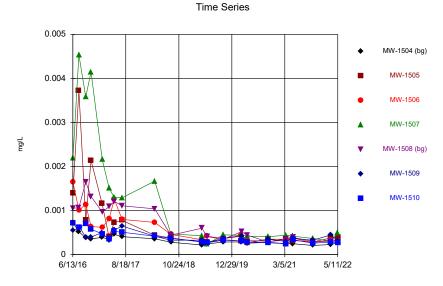
Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series



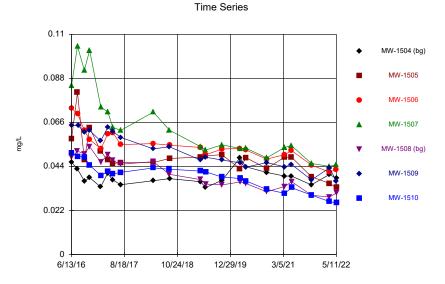
Constituent: Antimony, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG

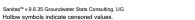


Constituent: Arsenic, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

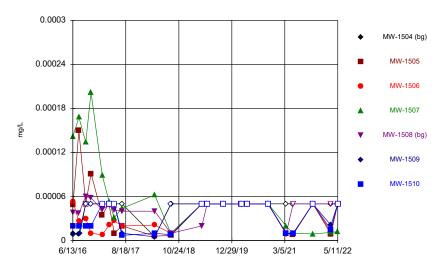
Sanitas™ v.9.6.35 Groundwater Stats Consulting. UG



Constituent: Barium, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

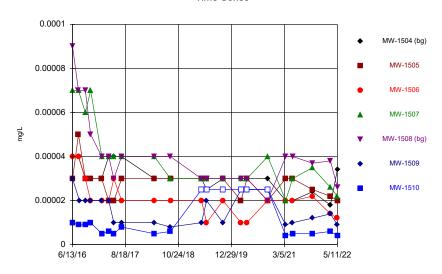






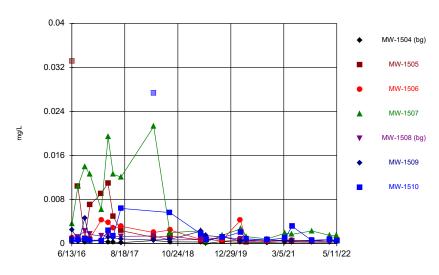
Constituent: Beryllium, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series



Constituent: Cadmium, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

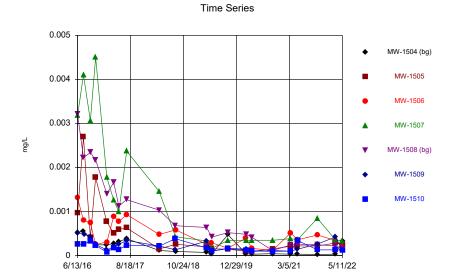
Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG



Time Series

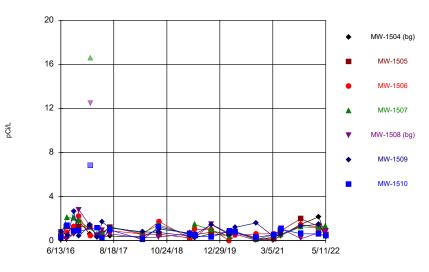
Constituent: Chromium, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.35 Groundwater Stats Consulting. UG



Constituent: Cobalt, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG

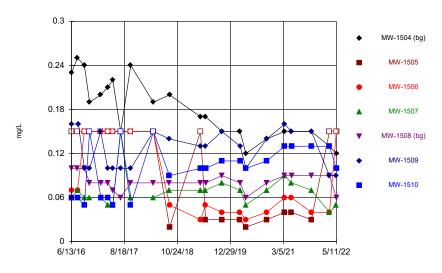




Constituent: Combined Radium 226 + 228 Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.



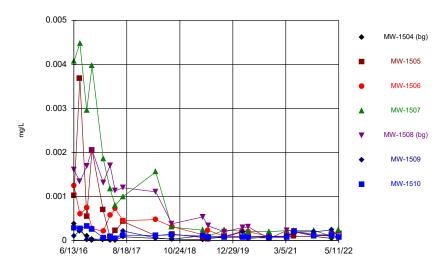


Constituent: Fluoride, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG

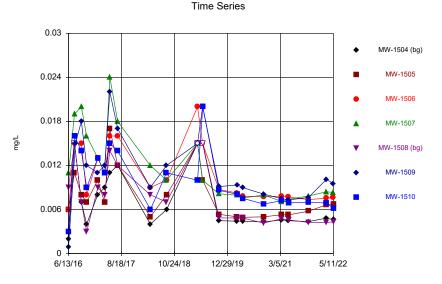
Hollow symbols indicate censored values.



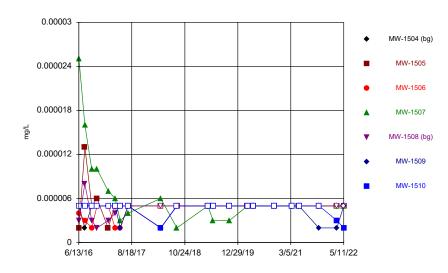
Time Series

Constituent: Lead, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

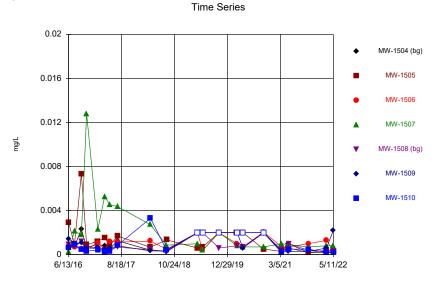
Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.



Constituent: Lithium, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP Time Series

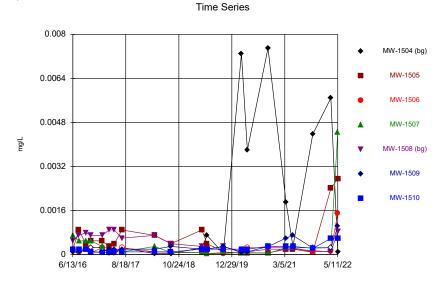


Constituent: Mercury, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.



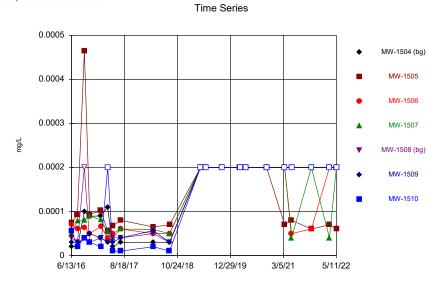
Constituent: Molybdenum, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.



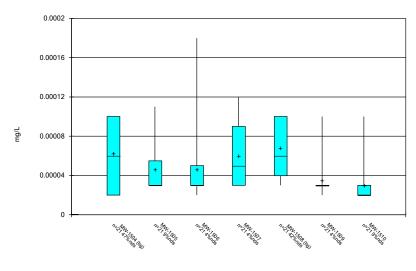
Constituent: Selenium, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

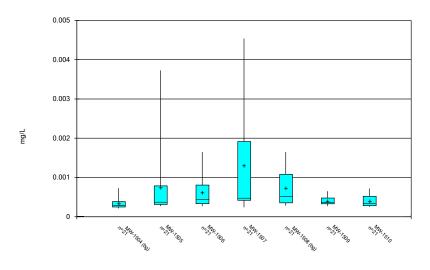


Constituent: Thallium, total Analysis Run 8/8/2022 11:40 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



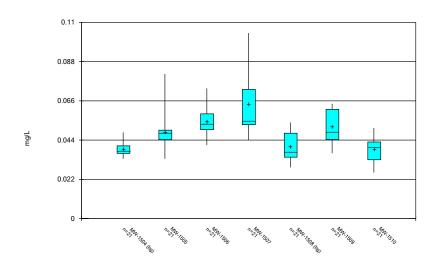
Box & Whiskers Plot



Constituent: Arsenic, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.35 Groundwater Stats Consulting. UG

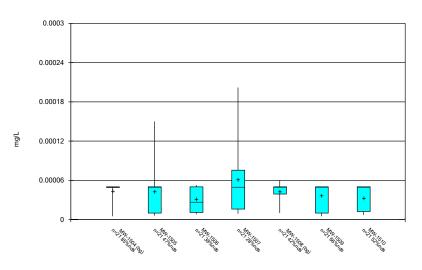
Box & Whiskers Plot



Constituent: Barium, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP



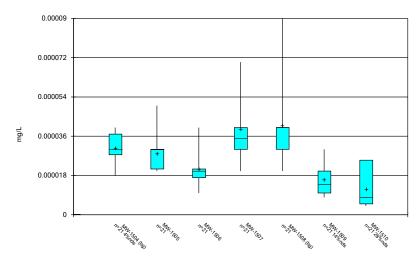




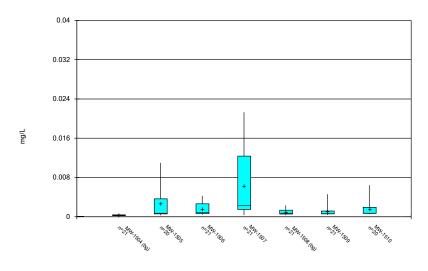
Constituent: Beryllium, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Constituent: Antimony, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot

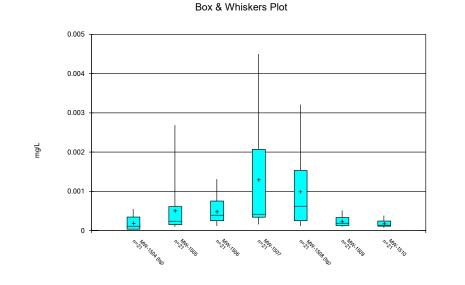


Constituent: Cadmium, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP



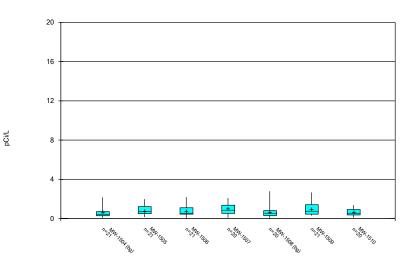
Constituent: Chromium, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.35 Groundwater Stats Consulting. UG



Constituent: Cobalt, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG

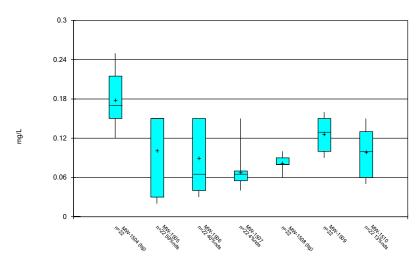




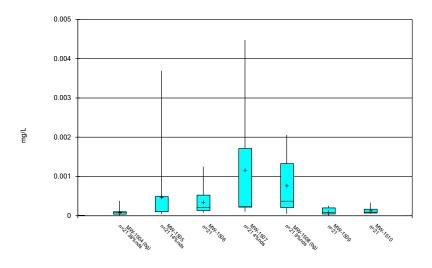
Constituent: Combined Radium 226 + 228 Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot





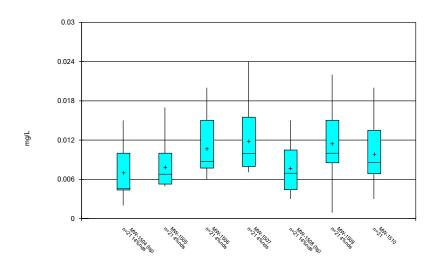
Box & Whiskers Plot



Constituent: Lead, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.35 Groundwater Stats Consulting. UG

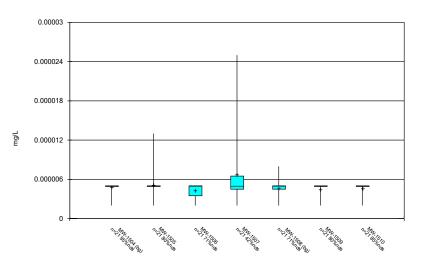
Box & Whiskers Plot



Constituent: Lithium, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP





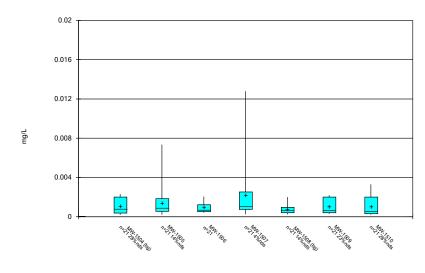


Constituent: Mercury, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

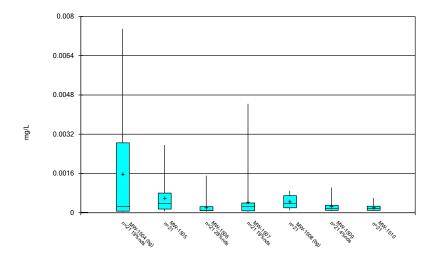
Constituent: Fluoride, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot





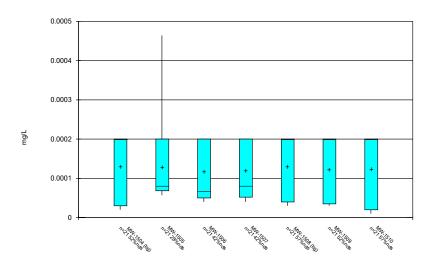
Constituent: Molybdenum, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Selenium, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG

Box & Whiskers Plot



Constituent: Thallium, total Analysis Run 8/8/2022 11:43 AM Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Outlier Summary

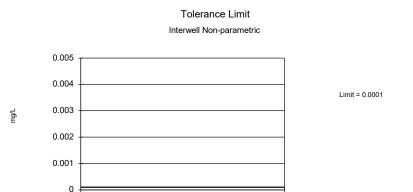
Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 8/8/2022, 11:46 AM

	MW-1505 Chromium, total (mg/L) MW-1505 Chromium, total (mg/L) MW-1507 Combined Radium 226 + 228 (pCi/L) MW-1508 Combined Radium 226 + 228 (pCi/L) MW-1510 Combined Radium 226 + 228 (pCi/L)
6/14/2016	0.0332 (o)
2/8/2017	16.587 (o) 12.465 (o) 6.828 (o)
4/12/2018	0.0274 (o)

Upper Tolerance Limits - Summary Table

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/4/2022, 1:48 PM

Constituent	Well	Upper Lim.	Date	Observ.	<u>Sig. Bg N</u>	Bg Mean	Std. Dev.	<u>%NDs</u>	<u>ND Adj.</u>	<u>Transform</u>	<u>Alpha</u>	Method
Antimony, total (mg/L)	n/a	0.0001	n/a	n/a	n/a 38	n/a	n/a	42.11	n/a	n/a	0.1424	NP Inter(normality)
Arsenic, total (mg/L)	n/a	0.00165	n/a	n/a	n/a 38	n/a	n/a	0	n/a	n/a	0.1424	NP Inter(normality)
Barium, total (mg/L)	n/a	0.05341	n/a	n/a	n/a 38	0.04021	0.006162	0	None	No	0.05	Inter
Beryllium, total (mg/L)	n/a	0.00006	n/a	n/a	n/a 38	n/a	n/a	60.53	n/a	n/a	0.1424	NP Inter(NDs)
Cadmium, total (mg/L)	n/a	0.00009	n/a	n/a	n/a 38	n/a	n/a	2.632	n/a	n/a	0.1424	NP Inter(normality)
Chromium, total (mg/L)	n/a	0.001974	n/a	n/a	n/a 38	0.02449	0.009309	0	None	sqrt(x)	0.05	Inter
Cobalt, total (mg/L)	n/a	0.002894	n/a	n/a	n/a 38	0.07386	0.03205	0	None	x^(1/3)	0.05	Inter
Combined Radium 226 + 228 (pCi/L)	n/a	1.945	n/a	n/a	n/a 37	0.7173	0.3151	0	None	sqrt(x)	0.05	Inter
Fluoride, total (mg/L)	n/a	0.25	n/a	n/a	n/a 40	n/a	n/a	0	n/a	n/a	0.1285	NP Inter(normality)
Lead, total (mg/L)	n/a	0.004765	n/a	n/a	n/a 38	-8.756	1.592	21.05	Kaplan-Meier	ln(x)	0.05	Inter
Lithium, total (mg/L)	n/a	0.03	n/a	n/a	n/a 38	n/a	n/a	15.79	n/a	n/a	0.1424	NP Inter(normality)
Mercury, total (mg/L)	n/a	0.000008	n/a	n/a	n/a 38	n/a	n/a	81.58	n/a	n/a	0.1424	NP Inter(NDs)
Molybdenum, total (mg/L)	n/a	0.001815	n/a	n/a	n/a 38	-7.492	0.5513	23.68	Kaplan-Meier	ln(x)	0.05	Inter
Selenium, total (mg/L)	n/a	0.006464	n/a	n/a	n/a 38	-8.078	1.417	10.53	None	ln(x)	0.05	Inter
Thallium, total (mg/L)	n/a	0.0002	n/a	n/a	n/a 38	n/a	n/a	50	n/a	n/a	0.1424	NP Inter(normality)



Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 38 background values. 42.11% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1424.

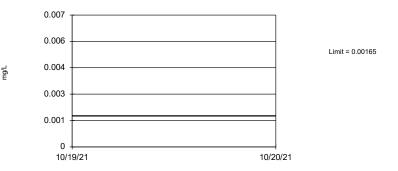
10/20/21

Constituent: Antimony, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Tolerance Limit



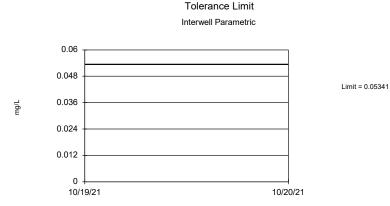


Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 38 background values. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.5. Report alpha = 0.1424.

Constituent: Arsenic, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG

10/19/21

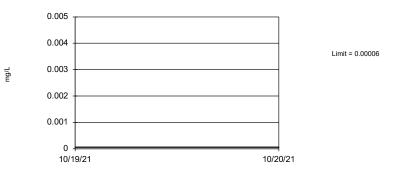


95% coverage. Background Data Summary: Mean=0.04021, Std. Dev.=0.006162, n=38. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9342, critical = 0.916. Report alpha = 0.05.

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Tolerance Limit

Interwell Non-parametric

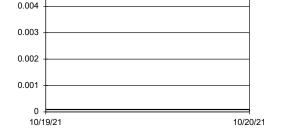


Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Limit is highest of 38 background values. 60.53% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.5. Report alpha = 0.1424.

ng/L

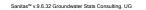
0.005

Tolerance Limit Interwell Non-parametric



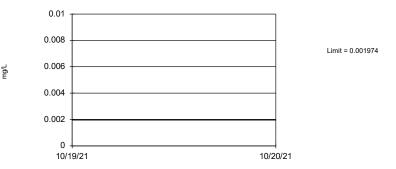
Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 38 background values. 2.632% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1424.

Constituent: Cadmium, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP





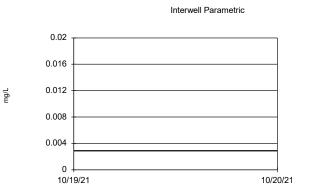
Interwell Parametric

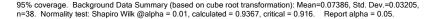


95% coverage. Background Data Summary (based on square root transformation): Mean=0.02449, Std. Dev.=0.009309, n=38. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9398, critical = 0.916. Report alpha = 0.05.

Constituent: Chromium, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP

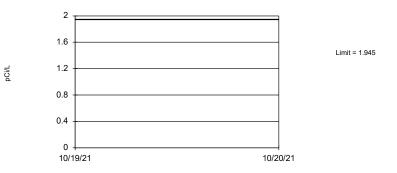
Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG





Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



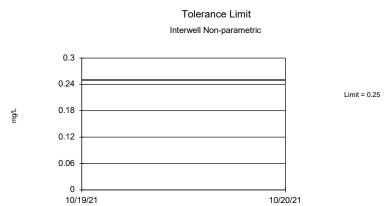


95% coverage. Background Data Summary (based on square root transformation): Mean=0.7173, Std. Dev.=0.3151, n=37. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9572, critical = 0.914. Report alpha = 0.05.

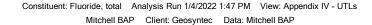




Limit = 0.00009



Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 40 background values. 89.26% coverage at alpha=0.01; 92.77% coverage at alpha=0.5. Report alpha = 0.1285.

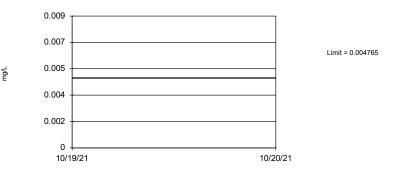


Tolerance Limit





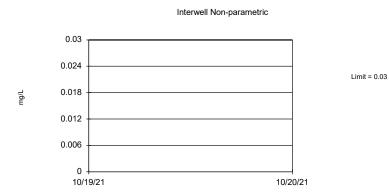
Interwell Parametric



95% coverage. Background Data Summary (based on natural log transformation) (after Kaplan-Meier Adjustment): Mean=-8.756, Std. Dev.=1.592, n=38, 21.05% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9382, critical = 0.916. Report alpha = 0.05.

> Constituent: Lead, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP

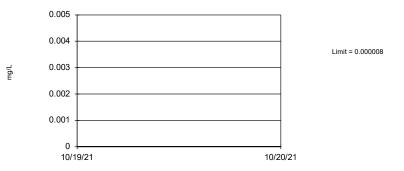
Sanitas™ v.9.6.32 Groundwater Stats Consulting. UG



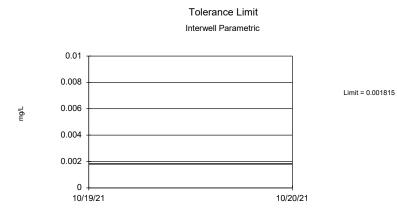
Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 38 background values. 15.79% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1424. Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG

Tolerance Limit

Interwell Non-parametric



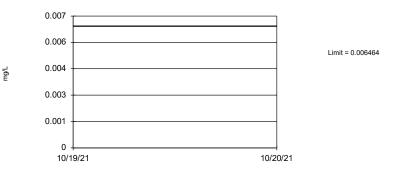
Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Limit is highest of 38 background values. 81.58% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1424.



95% coverage. Background Data Summary (based on natural log transformation) (after Kaplan-Meier Adjustment): Mean=7.492, Std. Dev.=0.5513, n=38, 23.68% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.0276, critical = 0.916. Report lapha = 0.05. Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



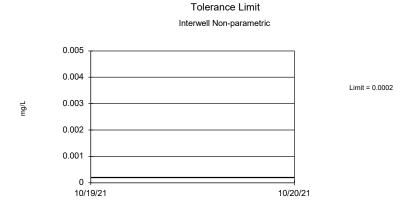
Interwell Parametric



95% coverage. Background Data Summary (based on natural log transformation): Mean=-8.078, Std. Dev.=1.417, n=38, 10.53% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9316, critical = 0.916. Report alpha = 0.05.

Constituent: Molybdenum, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP Constituent: Selenium, total Analysis Run 1/4/2022 1:47 PM View: Appendix IV - UTLs Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.32 Groundwater Stats Consulting. UG



Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 38 background values. 50% NDs. 88.48% coverage at alpha=0.01; 92.38% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha= 1.0424.

MITCHELL BAP GWPS												
	Compliance	CCR-Rule	Background									
Constituent Name	Limit	Specified	Limit	GWPS								
Antimony, Total (mg/L)	0.006		0.0001	0.006								
Arsenic, Total (mg/L)	0.01		0.0017	0.01								
Barium, Total (mg/L)	2		0.053	2								
Beryllium, Total (mg/L)	0.004		0.00006	0.004								
Cadmium, Total (mg/L)	0.005		0.00009	0.005								
Chromium, Total (mg/L)	0.1		0.002	0.1								
Cobalt, Total (mg/L)	n/a	0.006	0.0029	0.006								
Combined Radium, Total (pCi/L)	5		1.95	5								
Fluoride, Total (mg/L)	4		0.25	4								
Lead, Total (mg/L)	n/a	0.015	0.0048	0.015								
Lithium, Total (mg/L)	n/a	0.04	0.03	0.04								
Mercury, Total (mg/L)	0.002		0.000008	0.002								
Molybdenum, Total (mg/L)	n/a	0.1	0.0018	0.1								
Selenium, Total (mg/L)	0.05		0.0065	0.05								
Thallium, Total (mg/L)	0.002		0.0002	0.002								

*GWPS = Groundwater Protection Standard

*MCL = Maximum Contaminant Level

*CCR = Coal Combustion Residual

Confidence Intervals - All Results (No Significant)

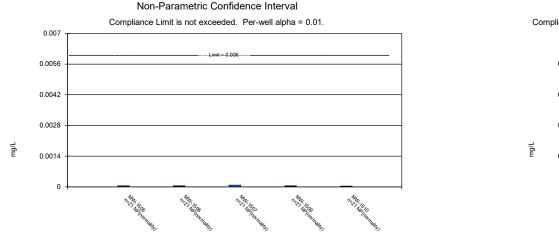
Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 8/8/2022, 11:53 AM

		Witcheil	BAP Client: Ge	eosyntec Da		cneii	BAP Printed	18/8/2022, 11:53					
Constituent	Well	Upper Lim.	Lower Lim.	Compliance	<u>Sig.</u>	<u>N</u>	Mean	Std. Dev.	<u>%NDs</u>	<u>ND Adj.</u>	Transforr	n <u>Alpha</u>	Method
Antimony, total (mg/L)	MW-1505	0.00005	0.00003	0.006	No	21	0.00004143	0.00001957	9.524	None	No	0.01	NP (normality)
Antimony, total (mg/L)	MW-1506	0.00005	0.00002	0.006	No	21	0.00004333	0.00003411	4.762	None	No	0.01	NP (normality)
Antimony, total (mg/L)	MW-1507	0.00008	0.00003	0.006	No	21	0.00005714	0.00003133	4.762	None	No	0.01	NP (normality)
Antimony, total (mg/L)	MW-1509	0.00005	0.00002	0.006	No	21	0.00003238	0.00001446	4.762	None	No	0.01	NP (normality)
Antimony, total (mg/L)	MW-1510	0.00003	0.00002	0.006	No	21	0.00002524	0.000009284	9.524	None	No	0.01	NP (normality)
Arsenic, total (mg/L)	MW-1505	0.00079	0.00031	0.01	No	21	0.00074	0.0008292	0	None	No	0.01	NP (normality)
Arsenic, total (mg/L)	MW-1506	0.0007681	0.0004032	0.01	No	21	0.0006167	0.0003767	0	None	sqrt(x)	0.01	Param.
Arsenic, total (mg/L)	MW-1507	0.00216	0.00042	0.01	No	21	0.001299	0.001326	0	None	No	0.01	NP (normality)
Arsenic, total (mg/L)	MW-1509	0.0004672	0.0003451	0.01	No	21	0.0004062	0.0001107	0	None	No	0.01	Param.
Arsenic, total (mg/L)	MW-1510	0.0004722	0.0003159	0.01	No	21	0.0004024	0.0001509	0	None	sqrt(x)	0.01	Param.
Barium, total (mg/L)	MW-1505	0.05326	0.04317	2	No	21	0.0486	0.009867	0	None	x^(1/3)	0.01	Param.
Barium, total (mg/L)	MW-1506	0.0587	0.04994	2	No	21	0.05432	0.007937	0	None	No	0.01	Param.
Barium, total (mg/L)	MW-1507	0.0727	0.05379	2	No	21	0.064	0.01813	0	None	sqrt(x)	0.01	Param.
Barium, total (mg/L)	MW-1509	0.05654	0.04661	2	No	21	0.05158	0.008999	0	None	No	0.01	Param.
Barium, total (mg/L)	MW-1510	0.04274	0.03499	2	No	21	0.03886	0.007021	0	None	No	0.01	Param.
Beryllium, total (mg/L)	MW-1505	0.00005	0.00001	0.004	No	21	0.00004262	0.00003324	47.62	None	No	0.01	NP (normality)
Beryllium, total (mg/L)	MW-1506	0.00005	0.00001	0.004	No	21	0.00003124	0.00001799	38.1	None	No	0.01	NP (normality)
Beryllium, total (mg/L)	MW-1507	0.00007371	0.00002171	0.004	No	21	0.00006176	0.00005498	28.57	Kaplan-Meier	sqrt(x)	0.01	Param.
Beryllium, total (mg/L)	MW-1509	0.00005	0.00001	0.004	No	21	0.00003681	0.00001931	66.67	Kaplan-Meier	No	0.01	NP (NDs)
Beryllium, total (mg/L)	MW-1510	0.00005	0.000015	0.004	No	21	0.00003286	0.0000188	52.38	Kaplan-Meier	No	0.01	NP (NDs)
Cadmium, total (mg/L)	MW-1505	0.00003	0.000022	0.005	No	21	0.00002795	0.000006712	0	None	No	0.01	NP (normality)
Cadmium, total (mg/L)	MW-1506	0.000022	0.000014	0.005	No	21	0.00002086	0.000008332	0	None	No	0.01	NP (normality)
Cadmium, total (mg/L)	MW-1507	0.0000457	0.00003037	0.005	No	21	0.00003919	0.00001538	0	None	x^(1/3)	0.01	Param.
Cadmium, total (mg/L)	MW-1509	0.000025	0.00001	0.005	No	21	0.00001605	0.00000683	14.29	None	No	0.01	NP (normality)
Cadmium, total (mg/L)	MW-1510	0.000025	0.000005	0.005	No	21	0.00001176	0.000008763	28.57	None	No	0.01	NP (normality)
Chromium, total (mg/L)	MW-1505	0.00493	0.000567	0.1	No	20	0.002724	0.003632	0	None	No	0.01	NP (normality)
Chromium, total (mg/L)	MW-1506	0.001795	0.0007577	0.1	No	21	0.001583	0.001325	0	None	ln(x)	0.01	Param.
Chromium, total (mg/L)	MW-1507	0.007735	0.002121	0.1	No	21	0.00629	0.006543	0	None	x^(1/3)	0.01	Param.
Chromium, total (mg/L)	MW-1509	0.001221	0.0006102	0.1	No	21	0.00109	0.0009815	0	None	ln(x)	0.01	Param.
Chromium, total (mg/L)	MW-1510	0.0021	0.000655	0.1	No	20	0.001617	0.001669	0	None	No	0.01	NP (normality)
Cobalt, total (mg/L)	MW-1505	0.0005318	0.0001952	0.006	No	21	0.0005124	0.0006344	0	None	ln(x)	0.01	Param.
Cobalt, total (mg/L)	MW-1506	0.0006628	0.0003182	0.006	No		0.0004905	0.0003123	0	None	No	0.01	Param.
Cobalt, total (mg/L)	MW-1507	0.001379	0.0004452	0.006	No	21	0.001298	0.001353	0	None	ln(x)	0.01	Param.
Cobalt, total (mg/L)	MW-1509	0.0003089	0.0001606	0.006	No	21	0.0002348	0.0001344	0	None	No	0.01	Param.
Cobalt, total (mg/L)	MW-1510	0.0002327	0.0001344	0.006	No		0.0001836	0.00008914	0	None	No	0.01	Param.
Combined Radium 226 + 228 (pCi/L)	MW-1505	1.038	0.5442	5	No		0.7913	0.4479	0	None	No	0.01	Param.
Combined Radium 226 + 228 (pCi/L)	MW-1506	1.099	0.5059	5	No		0.8026	0.5378	0	None	No	0.01	Param.
Combined Radium 226 + 228 (pCi/L)	MW-1507	1.325	0.6896	5	No		1.007	0.559	0	None	No	0.01	Param.
Combined Radium 226 + 228 (pCi/L)	MW-1509	1.299	0.6349	5	No		0.967	0.602	0	None	No	0.01	Param.
Combined Radium 226 + 228 (pCi/L)	MW-1510	0.8797	0.4689	5	No		0.6743	0.3617	0	None	No	0.01	Param.
Fluoride, total (mg/L)	MW-1505	0.15	0.03	4	No		0.1009	0.06055	59.09	None	No	0.01	NP (NDs)
Fluoride, total (mg/L)	MW-1506	0.15	0.04	4	No		0.08955	0.05251	40.91	None	No	0.01	NP (normality)
Fluoride, total (mg/L)	MW-1507	0.07523	0.05658	4	No		0.06773	0.02181	4.545	None	ln(x)	0.01	Param.
Fluoride, total (mg/L)	MW-1509	0.15	0.1	4	No		0.1264	0.02592	0	None	No	0.01	NP (normality)
Fluoride, total (mg/L)	MW-1509	0.13	0.08043	4	No		0.09909	0.02392	13.64	None	No	0.01	Param.
Lead, total (mg/L)	MW-1510 MW-1505	0.000546	0.00043	4 0.015	No		0.0004823	0.0008718	13.04	None	No	0.01	NP (normality)
Lead, total (mg/L)	MW-1505	0.000348	0.0001	0.015	No		0.0004823	0.0002956	0	None		0.01	Param.
Lead, total (mg/L)	MW-1506	0.000449	0.0001774	0.015	No		0.0003461	0.0002956	0 4.762	None	sqrt(x) No	0.01	Param. NP (normality)
Lead, total (mg/L)	MW-1507 MW-1509	0.00186	0.000217	0.015			0.000102	0.0001454				0.01	Param.
					No				0	None	No		
Lead, total (mg/L)	MW-1510	0.0001613	0.00008376	0.015	No	21	0.0001322	0.00008427	0	None	x^(1/3)	0.01	Param.

Confidence Intervals - All Results (No Significant)

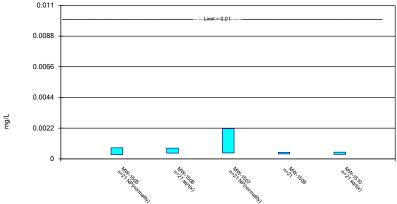
Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 8/8/2022, 11:53 AM

	Wildheir DAir Chong, Geosyntee Data, Wildheir DAir Thinted Oro/2022, 11:30 Awr												
Constituent	Well	Upper Lim.	Lower Lim.	Compliance	<u>Sig.</u>	<u>N</u>	Mean	Std. Dev.	<u>%NDs</u>	<u>ND Adj.</u>	Transform	<u>Alpha</u>	Method
Lithium, total (mg/L)	MW-1505	0.009043	0.005957	0.04	No	21	0.007906	0.00343	4.762	None	ln(x)	0.01	Param.
Lithium, total (mg/L)	MW-1506	0.01242	0.0084	0.04	No	21	0.0107	0.003944	4.762	None	x^(1/3)	0.01	Param.
Lithium, total (mg/L)	MW-1507	0.01411	0.009085	0.04	No	21	0.01189	0.004924	4.762	None	sqrt(x)	0.01	Param.
Lithium, total (mg/L)	MW-1509	0.01421	0.008791	0.04	No	21	0.0115	0.004909	4.762	None	No	0.01	Param.
Lithium, total (mg/L)	MW-1510	0.01215	0.007576	0.04	No	21	0.009861	0.004141	0	None	No	0.01	Param.
Mercury, total (mg/L)	MW-1505	0.000006	0.000002	0.002	No	21	0.000005143	0.000002032	80.95	None	No	0.01	NP (NDs)
Mercury, total (mg/L)	MW-1506	0.000005	0.000003	0.002	No	21	0.000004286	0.000001231	71.43	None	No	0.01	NP (NDs)
Mercury, total (mg/L)	MW-1507	0.000005348	0.000002389	0.002	No	21	0.000006667	0.000005199	42.86	Kaplan-Meier	ln(x)	0.01	Param.
Mercury, total (mg/L)	MW-1509	0.000005	0.000002	0.002	No	21	0.000004429	0.000001207	80.95	Kaplan-Meier	No	0.01	NP (NDs)
Mercury, total (mg/L)	MW-1510	0.000005	0.000003	0.002	No	21	0.000004619	9.7e-7	85.71	Kaplan-Meier	No	0.01	NP (NDs)
Molybdenum, total (mg/L)	MW-1505	0.001337	0.0005512	0.1	No	21	0.00124	0.001526	14.29	None	ln(x)	0.01	Param.
Molybdenum, total (mg/L)	MW-1506	0.001192	0.0006602	0.1	No	21	0.0009676	0.000523	0	None	sqrt(x)	0.01	Param.
Molybdenum, total (mg/L)	MW-1507	0.002255	0.0007934	0.1	No	21	0.002186	0.002828	4.762	None	ln(x)	0.01	Param.
Molybdenum, total (mg/L)	MW-1509	0.0008583	0.0004284	0.1	No	21	0.0007881	0.0004562	23.81	Kaplan-Meier	sqrt(x)	0.01	Param.
Molybdenum, total (mg/L)	MW-1510	0.0006065	0.0002894	0.1	No	21	0.0007381	0.0006665	28.57	Kaplan-Meier	ln(x)	0.01	Param.
Selenium, total (mg/L)	MW-1505	0.0007212	0.0002016	0.05	No	21	0.0005924	0.0007196	0	None	x^(1/3)	0.01	Param.
Selenium, total (mg/L)	MW-1506	0.0001199	0.00004866	0.05	No	21	0.00021	0.0003082	28.57	Kaplan-Meier	ln(x)	0.01	Param.
Selenium, total (mg/L)	MW-1507	0.0002222	0.00006177	0.05	No	21	0.0004381	0.0009347	19.05	Kaplan-Meier	ln(x)	0.01	Param.
Selenium, total (mg/L)	MW-1509	0.0003076	0.0001429	0.05	No	21	0.0002705	0.0002343	4.762	None	ln(x)	0.01	Param.
Selenium, total (mg/L)	MW-1510	0.0002665	0.0001352	0.05	No	21	0.0002176	0.0001445	0	None	x^(1/3)	0.01	Param.
Thallium, total (mg/L)	MW-1505	0.0002	0.000067	0.002	No	21	0.0001288	0.00009662	28.57	None	No	0.01	NP (normality)
Thallium, total (mg/L)	MW-1506	0.0002	0.00005	0.002	No	21	0.0001176	0.00007339	42.86	None	No	0.01	NP (normality)
Thallium, total (mg/L)	MW-1507	0.0002	0.000051	0.002	No	21	0.0001201	0.00007213	42.86	None	No	0.01	NP (normality)
Thallium, total (mg/L)	MW-1509	0.0002	0.00004	0.002	No	21	0.0001227	0.00008331	52.38	None	No	0.01	NP (NDs)
Thallium, total (mg/L)	MW-1510	0.0002	0.00002	0.002	No	21	0.0001246	0.00008976	57.14	None	No	0.01	NP (NDs)



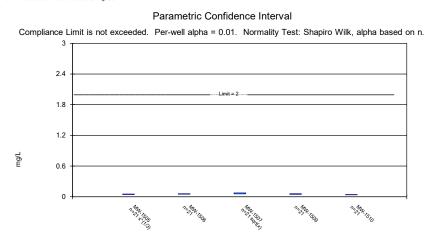
Constituent: Antimony, total Analysis Run 8/8/2022 11:47 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Arsenic, total Analysis Run 8/8/2022 11:47 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

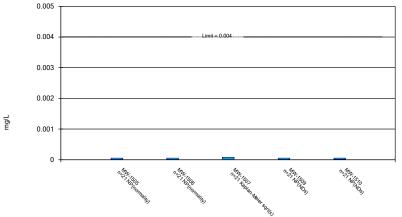
Sanitas™ v.9.6.35 Groundwater Stats Consulting. UG



Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

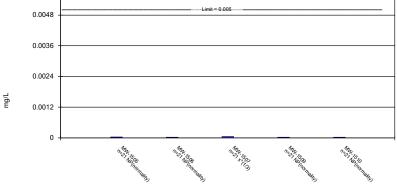
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Barium, total Analysis Run 8/8/2022 11:47 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP Constituent: Beryllium, total Analysis Run 8/8/2022 11:47 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

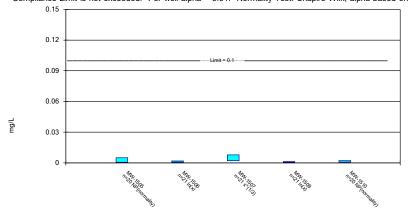
Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n. 0.006



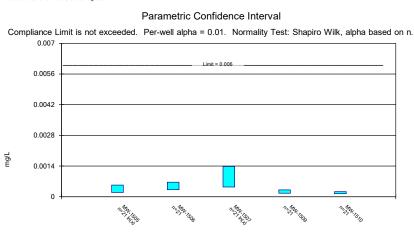
Constituent: Cadmium, total Analysis Run 8/8/2022 11:47 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Chromium, total Analysis Run 8/8/2022 11:47 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

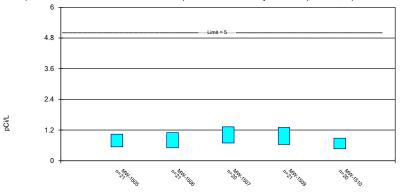
Sanitas™ v.9.6.35 Groundwater Stats Consulting. UG



Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG

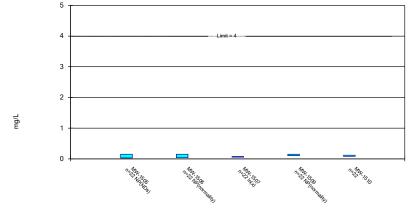
Parametric Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



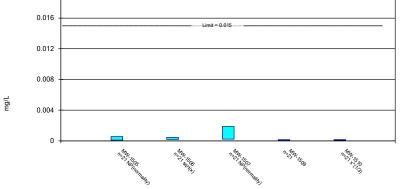
Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



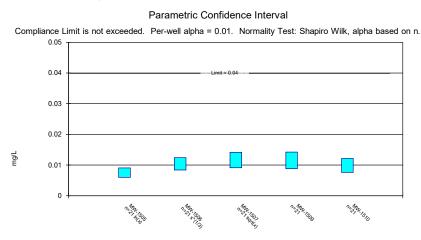


Parametric and Non-Parametric (NP) Confidence Interval



Constituent: Lead, total Analysis Run 8/8/2022 11:47 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

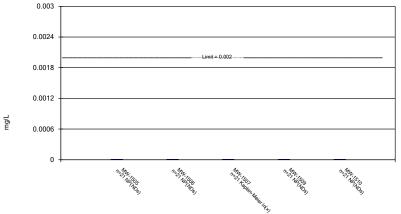
Sanitas™ v.9.6.35 Groundwater Stats Consulting. UG



Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

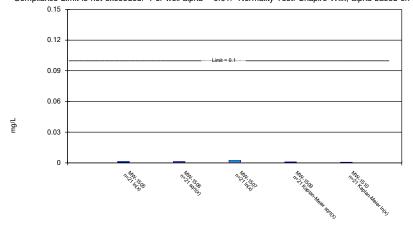


Constituent: Lithium, total Analysis Run 8/8/2022 11:47 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP Constituent: Mercury, total Analysis Run 8/8/2022 11:47 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Constituent: Fluoride, total Analysis Run 8/8/2022 11:47 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

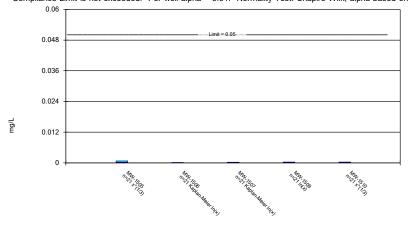
Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG

Parametric Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



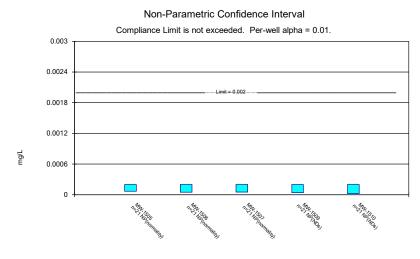
Constituent: Molybdenum, total Analysis Run 8/8/2022 11:47 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Selenium, total Analysis Run 8/8/2022 11:48 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sanitas[™] v.9.6.35 Groundwater Stats Consulting. UG



Constituent: Thallium, total Analysis Run 8/8/2022 11:48 AM View: Appendix IV Mitchell BAP Client: Geosyntec Data: Mitchell BAP

APPENDIX 3 – Alternative Source Demonstrations

Alternative source demonstrations relative to Appendix IV SSLs above the groundwater protection standard were not necessary because no SSLs above the groundwater protection standards were identified in 2022. Alternative source demonstrations are not applicable at this time.

APPENDIX 4 - Notices for Monitoring Program Transitions

No transition between monitoring requirements occurred in 2022; the CCR unit remained in assessment monitoring. Notices for monitoring program transitions are not applicable at this time.

APPENDIX 5 - Well Installation/Decommissioning Logs

No monitoring wells installed or decommissioned in 2022. Well installation/decommissioning logs are not applicable at this time.