

Consulting Engineers and October 2, 2024 (Revised October 22, 2024)

Project 2304769

Scientists

Via Email: paul.hlavinka@maryland.gov; anuradha.mohanty@maryland.gov

Ms. Anuradha Mohanty Project Manager Maryland Department of the Environment Land and Materials Administration 1800 Washington Boulevard, Suite: 625 Baltimore, Maryland 21230

Mr. Paul Hlavinka Maryland Department of Environment Water and Science Administration 1800 Washington Blvd Baltimore, Maryland 21230

Re: Basin DA-2 and DA-11 Water Management Plan – Discharge to Groundwater

Proposed Addendum to EMP-2 Rev 2 (May 20, 2024)

Quantum Maryland

Former Alcoa Eastalco Property

Frederick, Maryland

Dear Ms. Mohanty and Mr. Hlavinka:

GEI Consultants, Inc. (GEI) and Quantum Maryland, LLC (QM) are requesting your approval of the water management plan described herein for the dewatering of stormwater basins DA-2 and DA-11 as part of the Quantum Place (QPS) Improvement Plan. As you are aware, completion of construction of these stormwater basins is the first major step in the construction sequence of QPS. QPS construction is part of the scope of work described within Environmental Management Plan 2 (EMP-2 Rev 2, dated May 20, 2024). It is also the subject of MDE construction stormwater permit Notices of Intent (NOIs) 20CPK08SX (QM) and 20CPK08SY (STO) which were issued by MDE September 6, 2024. The locations of basins DA-2 and DA-11 are shown on **Figure 1**.

This letter seeks approval from Maryland Department of the Environment (MDE) Land and Materials Administration (LMA) for approval to discharge Basin DA-2 and DA-11 waters to groundwater as a proposed Addendum to EMP-2 Rev 2. This letter also seeks approval from MDE Water Science Administration (WSA) as an operational procedure under the recently issued 20-CP Permit.

GEI previously submitted a *Basin DA-2 and DA-11 Water Management Plan* (September 3, 2024, revised September 6, 2024) describing proposed discharge of basin DA-2 and DA-11 water to surface water. WSA provided comment dated September 5, 2024 regarding the discharge flow rate which was addressed in Revision 1 September 6, 2024. LMA provided comments dated

Discharge to Groundwater Request Former Alcoa Eastalco Property

September 12, 2024. These comments related to the June 2024 basin data, consistency with the approved EMP-2 water management procedures, potential groundwater contaminant sources, and ongoing free cyanide monitoring in surface water.

The LMA comment email states that "Another alternative may be to allow the water to infiltrate to groundwater at a low lying area during the construction of the DAs." Based on that email and subsequent conversation with LMA, GEI submitted on September 19 a drawing similar to **Figure 2** of this letter presenting a plan to distribute water over the land surface within the Environmental Covenant (EC) area to infiltrate to groundwater in a manner which does not run off to surface water. The proposed plan was discussed at a September 24, 2024 on-site meeting with LMA, WSA, and Frederick County representatives (Anu Mohanty, Kate Ansalvish, and Douglas Cochran). This *Basin DA-2 and DA-11 Water Management Plan – Discharge to Groundwater* presents additional detail and requests LMA and WSA approval.

Discharge to groundwater rather than surface water means that the chronic fresh water free cyanide criterion described in the prior plan is not relevant or applicable. Discharge to groundwater also addresses expressed uncertainty regarding possible changes in basin water quality due to groundwater infiltration as basin dewatering occurs. As water is to be discharged back to the same groundwater from which it came, data for chemicals of concern (COC) which may be slightly above any groundwater cleanup standard cannot result in any deterioration of groundwater quality.

This Plan has been revised to reflect combined LMA and WSA comments transmitted by email dated October 17 from Barbara Krupiarz with clarification by Paul Hlavinka regarding the number of samples.

Purpose

As described below the DA-11 volume has fluctuated between approximately 500,000 and 2,700,000 gallons. As of October 21, DA-11 contained approximately 250,000 gallons of water, with approximately 700,000 gallons in DA-2.

An LMA-approved management procedure for containerization, testing, and use of construction water for dust control is described in Appendix G of EMP-2.¹ On the WSA side, a July 15, 2024 letter and procedure describe WSA requirements for testing of containerized water and the approval process for use for dust control.

The combined LMA (Appendix G) and WSA (July 15 letter) procedures have been applied to evaluate and approve seven frac tanks full of water removed from Basin DA-11 in March 2024 and that water has been used for site dust control. Six tanks have been refilled.

The reason for this letter is to describe the procedure that will be used for removal and management of the entire volume of water present in basins DA-2 and DA-11 as well as for maintaining dry conditions during the remainder of the basin construction and lining process.

GEI Consultants, Inc.

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¹ Appendix G of EMP's 1A, 2, 3, 4 contained substantially similar water testing and management procedures. Based on discussion with MDE after approval of EMP-2 Rev 2, testing procedures and standards in EMP-1A Appendix G were revised and approved. The same revisions were submitted as a draft modification to EMP-2 as DRAFT EMP-2 Rev 3 (August 13, 2024); however that revision was returned by MDE for reasons unrelated to Appendix G procedures. This letter presumes that approval of the revised EMP-2 Appendix G will be administratively addressed, and references herein to EMP-2 Appendix G refer to the terms of the submitted revision.

The method described in Appendix G to EMP-2 Rev 2 is not practical for management of the entire volume of water present in DA-2 and DA-11.

The proposed water management plan for basins DA-2 and DA-11 will:

- Effectively dewater both basins at a rate necessary to empty the basins and keep them dry during basin construction/lining;
- Provide additional capacity to address precipitation inflow (primarily observed in DA-11) and groundwater seepage (more likely in DA-2 based on basin depth relative to groundwater but also possible in DA-11);
- Ensure the same water quality goals as presently required; and
- Reduce truck traffic to the site (for frac tanks and/or water shipments).

Stormwater Basins Recent Actions and Data

Rain events during the early spring of 2024 filled stormwater Basin DA-11 to beyond capacity (top of berm). Completion of basin construction including the spillway and liner has not yet been completed. Construction is authorized under EMP-2 and the 20-CP construction stormwater permit issued September 6, 2024.

GEI requested and received approval from the Maryland Department of the Environment (MDE) to dewater the basin and place the water into on-site frac tanks per the water management procedure of EMP-1A at the same time that procedure was being written into EMP-2 (which includes Quantum Place South and the basins).

Approximately 200,000 gallons of water was pumped from Basin DA-11 into 10 on-site frac tanks. The dewatering was conducted from April 5 through April 11, 2024 and resulted in lowering the basin water level by approximately 6 inches. Analytical samples were collected from each frac tank (in addition to the initial basin water sample) and sent for laboratory analysis.

The basin water sample and 7 of the 10 tank samples met MDE drinking water standards for all parameters tested (including fluoride, cyanide, pH, DRO, GRO, metals, VOCs, PAHs, PCBs, pesticides). Water in the three tanks which did not pass (tanks A652, N48966, and A1930) was disposed off-site; however, we suspect this was due to cleanliness of the tanks themselves as the basin water sample met MDE drinking water standards. The remaining 7 tanks (A4712, N48962, A2636, A1173, A4209, A3718, A4832) were approved by LMA and WSA and have been used for site dust control.

Basin Water Sampling and Results

Eight water samples were collected by Tetra Tech from Basin DA-11 on June 4, 2024 in accordance with an MDE-approved sampling plan. Four samples were collected from one foot below the water surface and another four samples were collected at prescribed depths. The water samples were analyzed for the following parameters: pH, fluoride, free cyanide, priority pollutant metals (dissolved), volatile organic compounds, polycyclic aromatic hydrocarbons, polychlorinated biphenyls, and total petroleum hydrocarbons (diesel range organics/gasoline range organics). Additionally, field turbidity readings were collected at one-foot depth increments from the surface to base of the basin at the time of the sampling.

On June 5, 2024 six samples were collected from the smaller Basin DA-2 (three shallow and three at varying depth) and tested for the same parameters.

MDE has not made a direct determination whether the same standards described under "Purpose" above apply to a groundwater discharge, and some flexibility is anticipated based on the concept of returning water to the groundwater from which it is generated. Sample results for each basin are tabulated and compared to MDE standards and attached to this letter (**Tables 1 and 2**). The WSA July 15 procedure requires data comparison to MCLs and acute fresh surface water criteria. Based on the LMA Appendix G procedure, samples are compared to MCLs, and where an MCL does not exist compared to MDE groundwater cleanup standards. Per the footnote on the tables, the Environmental Covenant (EC) additionally refers to the chronic surface water criteria of 0.0052 mg/l for free cyanide; however this criterion is not applicable or relevant to a discharge to groundwater. Combining LMA and WSA requirements, the tables flag (highlight) any exceedance of acute surface water criteria, any exceedance of MCLs, and any exceedance of a groundwater standard where an MCL does not exist.

Basin DA-11 Results

• All eight samples from DA-11 met all applicable requirements for all parameters tested.

Basin DA-2 Results

- Aside from diesel range organics (DRO [C10-C28]), all six samples from DA-2 met all applicable requirements for all parameters tested (including chronic free cyanide).
- For DRO:
 - O Standards are:
 - There is no drinking water MCL
 - There is no acute fresh water standard
 - The groundwater cleanup standard is 47 ug/l
 - The laboratory reporting limit varies per sample between 45 ug/l and 47 ug/l
 - The six sample results include 5 non-detect samples and one sample at 54 ug/l (J-flag estimated value).
 - QM requests LMA and WSA concurrence that short-term discharge of DA-2
 water to ground surface is acceptable and that the single estimated DRO value of
 54 ug/l does not prohibit discharge to groundwater of the DA-2 water as most
 recently tested.

Sampling and Discharge Plan

DA-11 Volume

Basin DA-11 is approximately 11 feet deep from top of existing berm to base of the sediment trap. Timmons Group has surveyed and provided elevations for Basin DA-11 and placed two water monitoring posts in the basin to determine water volumes (one near the west edge useful for

higher water elevations and one in the center capable of reading lower water elevations). A table was developed that correlates the elevation of the water with cubic feet of water in the basin (Attachment 1). Attachment 1 also includes an elevation contour map of DA-11 as it presently exists.

The highest recorded measurement (early April of 2024) was 322.38 (full capacity) or approximately 2,700,000 gallons of water. After removal of approximately 200,000 gallons to tanks, the water level continued to decrease during summer months reaching a low of approximately 550,000 gallons. The approximate 5-inch rainfall on/around August 8 then increased the basin water volume to approximately 1,300,000 gallons. Temporary berms have been constructed in order to reduce the run-on which can reach DA-11. The current water level (10/21/2024) is approximately at elevation 313.7 or approximately 250,300 gallons based on the Timmons table.

DA-2 Volume

Basin DA-2 is approximately 13 feet deep from top of existing berm to base of the sediment trap. While this is deeper than DA-11, DA-2 has steeper sides and a lower typical water pool. Timmons Group has surveyed and provided elevations for Basin DA-2. A table was developed that correlates the elevation of the water with cubic feet of water in the basin (**Attachment 2**). **Attachment 2** also includes an elevation contour map of DA-2 as it presently exists.

The current (October $\underline{21}$) water level is approximately at elevation $\underline{315.5}$ or approximately $\underline{700,500}$ gallons based on the Timmons table.

Proposed Discharge Locations

GEI evaluated locations within the EC where water can be discharged to the ground surface for infiltration to groundwater (without runoff to surface water). These can include locations contained by a physical berm/barrier or large areas where water can be applied at a moderate rate so that runoff does not occur.

Figure 2 shows <u>four</u> discharge locations (Discharge Area 1, 3, 4, and 5) for DA-11 and DA-2 discharge to groundwater. <u>Discharge Area 2 was removed from this request based on MDE comment and was removed from **Figure 2**. Any of the <u>four</u> areas are proposed for use for either basin, although it is anticipated that the most convenient locations will be Discharge Area 1 for Basin DA-11 and Discharge Area 5 for DA-2 based on proximity to the respective basins.</u>

• Discharge Area 1 is a vegetated area primarily comprising the future substation pad north of DA-11 (future Lot 112A) and adjacent area to the east of the substation pad (future Lot 112C). These combined areas comprise approximately 23.4 acres. Applying water at a conservative rate of one inch of water over this area amounts to 610,000 gallons (capacity 50% greater than the present DA-11 volume). One inch per week is a rate typically applied to spray irrigation systems for water disposal or agricultural irrigation. Runoff from the substation pad is partially contained by the berm constructed across the south end of the substation. Runoff from the area to the east is partially contained by the existing contours of the partially constructed Clean Energy Lane to the south. However, these containments are not relied upon in applying/infiltrating the calculated water volume. As a contingency, any excess water would be contained by the berms or would naturally drain back toward DA-11 and would not discharge to surface water.

- Discharge Area 3 is a vegetated area on future lot 102 located south of QPS and east of Sewer Line B. Keeping away from existing swales this area comprises approximately 11.9 acres. The downslope (western) end of this area is contained by the recently constructed berm, allowing water application at a depth up to an average of 0.25 feet, resulting in a total volume of 967,000 gallons. Any excess water in this area would naturally drain toward basin DA-11; the existing temporary berm and DA-11 itself would prevent discharge to surface water.
- Discharge Area 4 is a low-lying area to the west of Basin DA-2 and north of Stockpile 3. This area generally drains to the southeast toward Basin DA-2 but existing berms/topography prevent flow into DA-2. **Figure 2** shows an area of 3.4 acres and a proposed water depth of up to 0.24 feet or approximately 274,000 gallons.
- Discharge Area 5 is a low-lying area to the south of basin DA-2, bounded by former railroad berms and other features with no outlet to surface water. **Figure 2** shows an area of approximately 1.9 acres. Based on an average water depth of 2 feet over this area amounts to 1,207,000 gallons (50% more capacity than the present volume of DA-2). This area is within the mapped floodway; however in reality this area is physically separated from Tuscarora Creek by physical barriers including former rail embankment and provides a convenient water management/infiltration location with no outlet to surface water.

In all areas, additional water may be applied after infiltration of the stated dosage as long as runoff does not occur based on field verification. Based on the calculated capacity of Discharge Areas 1 (for DA-11) and 5 (for DA-2), the entire present basin volumes can be applied in one event, with reapplication only required if needed based on pond seepage during construction once emptied.

Pre-Discharge Sampling and Data Submittal

By email dated October 17, MDE provided a written WSA Process for Data Analysis and Review of Quantum Loophole DA-2 & DA-11 Standing Pool (WSA Process, copy attached). Prior to discharge, 8 samples will be collected from each basin at a variety of locations and depths. Proposed sample location plans for DA-2 and DA-11 are attached.

Samples will be analyzed for the list of parameters specified in item 2 of the WSA Process plus diesel range organics (DRO) which is specified under item 6.

Data will be tabulated and submitted in accordance with items 4 and 5 of the WSA Process.

Discharge will commence after review and approval of the data set by MDE per item 7 of the WSA Process.

Due to the decreased level of water in DA-11, and to move forward with basin construction QM may elect to move forward with containerization of the water to empty the basin prior to (in lieu of) sampling the basin, or may containerize the water prior to receipt of laboratory results. QM requests that in the case that 8 samples are collected and the water is then temporarily containerized (with field parameter measurement as described below at each foot of drawdown), WSA authorizes discharge based on the 8 samples from Basin DA-11 rather than subsequently testing the (approximately 15) tanks of water.

Proposed Discharge Methods

A floating inlet located (tethered) at the deepest part of each basin would be used to pump water from the basin to minimize sediment disturbance and lessen the amount of sediment in the discharge. For DA-11, this location is the western half of the basin where the base elevation is approximately 310.3. For DA-2, this is the eastern side of the basin where the base elevation is approximately 309.

As specified by WSA, water must be discharged in a manner with a linear velocity of less than 4 linear feet per second. Water will be distributed via a hose (approximate 4 to 6-inch diameter) following the route indicated by yellow arrows to reach the discharge location(s). The hose will connect to a network of perforated PVC pipe arranged at intervals for low-velocity discharge to ground surface or will be connected to a commercial/agricultural spray head(s) within the approved areas.

Item 8 of the WSA Process specifies field sampling and field analysis of three parameters during discharge. Item 8 states "This procedure should be followed for initial dewatering of the DA-2 & DA-11 standing pool. Drawdown should be taken from the surface or no deeper than 1 foot of depth. For each foot of drawdown, samples of turbidity, fluoride and cyanide must be taken to determine if these are increasing. An increase would indicate an interaction with groundwater and at that point all water must be containerized and then follow the same process used for frac tank processing."

Turbidity will be monitored using an Apera TN420 instrument or similar. Fluoride will be monitored using an ExTech handheld waterproof fluoride meter or equal. Cyanide will be measured using a Hannah Instruments portable Cyanide Photometer HI97714 or equal. Readings will be taken at a minimum at each foot of drawdown of each basin, with data tracked to identify increasing trends approaching selected criteria. Should fluoride or cyanide criteria be reached/exceeded, pumping will be ceased or diverted to tanks. For turbidity, there is no specific discharge criteria for groundwater discharge (not reaching surface water). GEI recommends a screening value of 1500 NTU (10 times the surface water criterion) to cease discharge or modify the intake or discharge to reduce turbidity.

QM proposes to use a 4-inch portable pump with a nominal flow rate of 1,200 gallons per minute for approximately 8 hours per day or approximately 576,000 gallons per day. This rate is adequate to discharge the present basin volumes in approximately 2 working days. In the case of Discharge Area 1, the present DA-11 volume (410,500 gallons) is equal to 0.67 inches when distributed over 23.4 acres, well within the range of typical stormwater events when applied over the course of one day.

Closing

GEI and Quantum Maryland appreciate MDE's review of this request. Please let us know if you have any questions or would like to schedule any further review meeting or discharge location inspection.

Sincerely,

Russell S. Greatorex, CHMM

Senior Scientist

William Silverstein, P.E.

Senior Consultant

cc: Brian Dietz – MDE LMA
Barbara Krupiarz – MDE LMA
Tyler Abbott – MDE LMA
Kate Ansalvish – MDE WSA
Brad Metzger – MDE WSA
Lee Curry – MDE WSA
AD Robison – QL
Josh Mullis – Tetra Tech
Michael Kuykendall - Catellus

Attachments:

Table 1 - Basin DA-11 Water Data - June 4, 2024

Table 2 - Basin DA-2 Water Data - June 5, 2024

Figure 1 - Site Plan

Figure 2 - Proposed Groundwater Discharge Areas

Figure 3 – Proposed DA-2 Sample Location Plan

Figure 3 – Proposed DA-11 Sample Location Plan

Attachment 1. Basin DA-11 Storage Capacity and Elevation Survey

Attachment 2. Basin DA-2 Storage Capacity and Elevation SurveyAttachment 3. WSA

Process for Data Analysis and Review of Quantum Loophole DA-2 & DA-11 Standing Pool

Tables

- 1. Basin DA-11 Water Data June 4, 2024
- 2. Basin DA-2 Water Data June 5, 2024

Client Name: Tetra Lab: Eurofins Lanca		mantown													
Specific Method	CAS#	Matrix	Analyte	Results Basis				410-17438		410-174386-4	410-174386-5	410-174386-6	410-174386-7	410-17438	
					MD LRP Cleanup	A1		QL-DA11-S Result	SW1-1-060424 QL-DA11-SW1-5-060424 Units Qualifier Result Units	QL-DA11-SW2-1-060424 Qualifier Result Units	QL-DA11-SW2-5-060424 Qualifier Result Units Qua	QL-DA11-SW3-1-060424 alifier Result Units Qualifi	QL-DA11-SW3-4-060424 er Result Units Qualifier	QL-DA11-9 Result	5W4-1-060424 QL-DA11-SW4-3-060424 Units Qualifier Result Units Qualifier
					Stds_Tbl 1_GWs Aquifers_Oct2018	AWQCFA	MCL								
8260D_LL		Water Water	1,1,1-Trichloroethane 1,1,2,2-Tetrachloroethane	Total Total	200 0.076	NC NC	200 NC	<0.080	5.	<0.080 ug/L <0.10 ug/L	<0.080 ug/L <0.10 ug/L	<0.080 ug/L <0.10 ug/L	<0.080 ug/L <0.10 ug/L	<0.080	
8260D_LL 8260D_LL		Water	1,1,2-Trichloroethane	Total	5	NC NC	5	<0.10 <0.080		<0.10 ug/L <0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.10 ug/L <0.080 ug/L	<0.10 <0.080	
8260D_LL		Water	1,1-Dichloroethane	Total	2.8	NC NG	NC 7	<0.10	5. 5.	<0.10 ug/L <0.10 ug/L	<0.10 ug/L <0.10 ug/L	<0.10 ug/L <0.10 ug/L	<0.10 ug/L <0.10 ug/L	<0.10 <0.10	ug/L <0.10 ug/L ug/L <0.10 ug/L
8260D_LL 8260D_LL		Water Water	1,1-Dichloroethene 1,2,4-Trichlorobenzene	Total Total	7 70	NC NC	7 70	<0.10 <0.070	5.	<0.10 ug/L <0.070 ug/L	<0.10 ug/L <0.070 ug/L	<0.10 ug/L	<0.10 ug/L <0.070 ug/L	<0.10	
8260D_LL		Water	1,2-Dibromo-3-Chloropropane 1.2-Dichlorobenzene	Total	0.2 600	NC NC	0.2 600	<0.10 <0.070		<0.10 ug/L <0.070 ug/L	<0.10 ug/L <0.070 ug/L	<0.10 ug/L <0.070 ug/L	<0.10 ug/L <0.070 ug/L	<0.10 <0.070	
8260D_LL 8260D_LL		Water Water	1,2-Dichloroethane	Total Total	5	NC NC	5	<0.070	5.	<0.070 ug/L	<0.070 ug/L	<0.070 ug/L	<0.070 ug/L	<0.070	5.
8260D_LL 8260D_LL		Water Water	1,2-Dichloropropane 1,3-Dichlorobenzene	Total Total	5 NC	NC NC	5 NC	<0.10	5.	<0.10 ug/L <0.070 ug/L	<0.10 ug/L <0.070 ug/L	<0.10 ug/L <0.070 ug/L	<0.10 ug/L <0.070 ug/L	<0.10	5.
8260D_LL 8260D_LL	106-46-7		1,4-Dichlorobenzene	Total	NC 75	NC NC	75	<0.070 <0.070		<0.070 ug/L	<0.070 lug/L	<0.070 ug/L	<0.070 ug/L	<0.070 <0.070	
8260D_LL		Water	2-Butanone	Total	560	NC	NC		ug/L <1.0 ug/L	<1.0 ug/L	<1.0 ug/L	<1.0 ug/L	<1.0 ug/L		ug/L <1.0 ug/L
8260D_LL 8260D_LL	591-78-6 108-10-1	Water	2-Hexanone 4-Methyl-2-pentanone	Total Total	NC 630	NC NC	NC NC	<2.0 <1.0	ug/L <2.0 ug/L ug/L <1.0 ug/L	<2.0 ug/L <1.0 ug/L	<2.0 ug/L <1.0 ug/L	<2.0 ug/L <1.0 ug/L	<2.0 ug/L <1.0 ug/L	<2.0 <1.0	ug/L <2.0 ug/L ug/L <1.0 ug/L
8270D_SIM		Water	Acenaphthene	Total	53	NC NG	NC NC	<0.010		<0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010	
8270D_SIM 8260D_LL	208-96-8 67-64-1	Water	Acetone Acetone	Total Total	NC 1400	NC NC	NC NC	<0.010 <1.5	5. 5.	<0.010 ug/L <1.5 ug/L	<0.010 ug/L <1.5 ug/L	<0.010 ug/L <1.5 ug/L	<0.010 ug/L <1.5 ug/L	<0.010 <1.5	ug/L <0.010 ug/L ug/L <1.5 ug/L
6020B	7429-90-5		Aluminum	Dissolved	2000	1100	NC		ug/L J 19 ug/L	J 14 ug/L	J 38 ug/L	18 ug/L J	31 ug/L		ug/L J 16 ug/L J
8270D_SIM 6020B	120-12-7 7440-36-0		Anthracene Antimony	Total Dissolved	180 6	NC NC	NC 6	<0.010 <0.20	5. 5.	<0.010 ug/L <0.20 ug/L	<0.010 ug/L <0.20 ug/L	<0.010 ug/L <0.20 ug/L	<0.010 ug/L <0.20 ug/L	<0.010 <0.20	
6020B	7440-38-2	Water	Arsenic	Dissolved	10	340	10	<0.68	ug/L 0.74 ug/L	J 0.90 ug/L	J <0.68 ug/L	0.79 ug/L J	0.69 ug/L J	0.71	ug/L J <0.68 ug/L
6020B 8260D LL	7440-39-3 71-43-2	Water Water	Barium Benzene	Dissolved Total	2000 5	NC NC	2000 5	9.4 <0.10	ug/L 9.2 ug/L ug/L <0.10 ug/L	9.4 ug/L <0.10 ug/L	9.6 ug/L <0.10 ug/L	9.5 ug/L <0.10 ug/L	9.8 ug/L <0.10 ug/L		ug/L 8.7 ug/L ug/L <0.10 ug/L
8270D_SIM	56-55-3	Water	Benzo[a]anthracene	Total	0.03	NC	0.1	<0.010	ug/L <0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010	ug/L <0.010 ug/L
8270D_SIM 8270D_SIM	50-32-8 205-99-2	Water Water	Benzo[a]pyrene Benzo[b]fluoranthene	Total Total	0.2 0.25	NC NC	0.2	<0.010 <0.010	5.	<0.010 ug/L <0.010 ug/L	<0.010 ug/L <0.010 ug/L	<0.010 ug/L <0.010 ug/L	<0.010 ug/L <0.010 ug/L	<0.010 <0.010	
8270D_SIM	191-24-2	Water	Benzo[g,h,i]perylene	Total	NC	NC	NC	<0.010	ug/L <0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010	ug/L <0.010 ug/L
8270D_SIM 6020B	207-08-9 7440-41-7	Water Water	Benzo[k]fluoranthene Beryllium	Total Dissolved	2.5 4	NC NC	0.2 4	<0.010 <0.12	5. 5.	<0.010 ug/L <0.12 ug/L	<0.010 ug/L <0.12 ug/L	<0.010 ug/L <0.12 ug/L	<0.010 ug/L <0.12 ug/L	<0.010 <0.12	
8260D_LL	75-27-4	Water	Bromodichloromethane	Total	80	NC	NC	<0.080	ug/L <0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080	ug/L <0.080 ug/L
8260D_LL 8260D_LL		Water Water	Bromoform Bromomethane	Total Total	80 0.75	NC NC	NC NC	<0.30	ug/L <0.30 ug/L ug/L <0.10 ug/L	<0.30 ug/L <0.10 ug/L	<0.30 ug/L <0.10 ug/L	<0.30 ug/L <0.10 ug/L	<0.30 ug/L <0.10 ug/L	<0.30 <0.10	
6020B	7440-43-9	Water	Cadmium	Dissolved	5	1.8	5	<0.15	ug/L <0.15 ug/L	<0.15 ug/L	<0.15 ug/L	<0.15 ug/L	<0.15 ug/L	<0.15	ug/L <0.15 ug/L
6020B 8260D LL	7440-70-2 75-15-0	Water Water	Carbon disulfide	Dissolved Total	NC 81	NC NC	NC NC	23000 < 0.10	5.	23000 ug/L J <0.10 ug/L	23000 ug/L <0.10 ug/L	23000 ug/L <0.10 ug/L	22000 ug/L <0.10 ug/L	22000 <0.10	ug/L 23000 ug/L ug/L <0.10 ug/L
8260D_LL	56-23-5	Water	Carbon tetrachloride	Total	5	NC	5	<0.10	ug/L <0.10 ug/L	<0.10 ug/L	<0.10 ug/L	<0.10 ug/L	<0.10 ug/L	<0.10	ug/L <0.10 ug/L
8260D_LL 8260D_LL		Water Water	Chlorobenzene Chloroethane	Total Total	100 2100	NC NC	100 NC	<0.070 <0.10		<0.070 ug/L <0.10 ug/L	<0.070 ug/L <0.10 ug/L	<0.070 ug/L <0.10 ug/L	<0.070 ug/L <0.10 ug/L	<0.070 <0.10	
8260D_LL	67-66-3	Water	Chloroform	Total	80	NC	NC	<0.090	ug/L <0.090 ug/L	<0.090 ug/L	<0.090 ug/L	<0.090 ug/L	<0.090 ug/L	<0.090	ug/L <0.090 ug/L
8260D_LL 6020B	74-87-3 7440-47-3	Water Water	Chromium Chromium	Total Dissolved	19 100	NC 16	NC 100	<0.10 <0.55		<0.10 ug/L <0.55 ug/L	<0.10 ug/L <0.55 ug/L	<0.10 ug/L <0.55 ug/L	<0.10 ug/L <0.55 ug/L	<0.10 <0.55	
8270D_SIM	218-01-9	Water	Chrysene	Total	25	NC	0.2	<0.010	ug/L <0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010	ug/L <0.010 ug/L
8260D_LL 8260D_LL	156-59-2 10061-01-5		cis-1,2-Dichloroethene cis-1.3-Dichloropropene	Total Total	70 NC	NC NC	70 NC	<0.080		<0.080 ug/L <0.10 ug/L	<0.080 ug/L <0.10 ug/L	<0.080 ug/L <0.10 ug/L	<0.080 ug/L <0.10 ug/L	<0.080 <0.10	
6020B	7440-48-4	Water	Cobalt	Dissolved	NC	NC	NC	<0.16	ug/L <0.16 ug/L	0.23 ug/L	J <0.16 ug/L	<0.16 ug/L	0.18 ug/L J	<0.16	ug/L <0.16 ug/L
6020B 9040C		Water Water	Copper Corrosivity	Dissolved Total	1300 NC	13 NC	1300 NC		ug/L 2.6 ug/L NONE HF no NONE	2.5 ug/L HF no NONE	2.9 ug/L HF no NONE HF	2.9 ug/L no NONE HF	2.6 ug/L no NONE HF		ug/L
1677_Free	N/A	Water	Cyanide, Free	Total	0.2	0.022	0.2	<0.0050	mg/L 0.0060 mg/L	0.0055 mg/L	J <0.0050 mg/L	<0.0050 mg/L	<0.0050 mg/L	0.0060	mg/L <0.0050 mg/L
8260D_LL 8270D_SIM		Water Water	Cyclohexane Dibenz(a.h)anthracene	Total Total	NC 0.025	NC NC	NC 0.3	<0.10 <0.020	ug/L <0.10 ug/L ug/L <0.020 ug/L	<0.10 ug/L <0.020 ug/L	<0.10 ug/L <0.021 ug/L	<0.10 ug/L <0.020 ug/L	<0.10 ug/L <0.020 ug/L	<0.10 <0.020	ug/L <0.10 ug/L ug/L <0.020 ug/L
8260D_LL	124-48-1		Dibromochloromethane	Total	80	NC	NC	<0.080	ug/L <0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080	ug/L <0.080 ug/L
8260D_LL 8015D_DRO	75-71-8 N/A	Water Water	Dichlorodifluoromethane DRO (C10-C28)	Total Total	NC 47	NC NC	NC NC	<0.10 <47		<0.10 ug/L <46 ug/L	<0.10 ug/L <46 ug/L	<0.10 ug/L <45 ug/L	<0.10 ug/L <46 ug/L	<0.10 <45	
8260D_LL	100-41-4	Water	Ethylbenzene	Total	700	NC	700	<0.080	ug/L <0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080	ug/L <0.080 ug/L
8011 8270D SIM	106-93-4 206-44-0		Ethylene Dibromide (1,2-dibromomethane) Fluoranthene	Total Total	0.05 80	NC NC	0.05 NC	<0.0095 <0.010		<0.0096 ug/L <0.010 ug/L	<0.0096 ug/L <0.010 ug/L	<0.0095 ug/L <0.010 ug/L	<0.0097 ug/L <0.010 ug/L	<0.0095 <0.010	
8270D_SIM	86-73-7	Water	Fluorene	Total	29	NC	NC	<0.010	ug/L <0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010 ug/L	<0.010	ug/L <0.010 ug/L
300_ORGFM_28D 8260D_LL	16984-48-8 76-13-1		Fluoride Freon 113	Total Total	NC NC	NC NC	4 NC	1.1 < 0.080		0.98 mg/L <0.080 ug/L	1.0 mg/L <0.080 ug/L	1.0 mg/L <0.080 ug/L	1.0 mg/L <0.080 ug/L	1.0 < 0.080	
8015D_GRO	N/A	Water	GRO	Total	47	NC	NC	<23	ug/L <23 ug/L	<23 ug/L	<23 ug/L	<23 ug/L	<23 ug/L	<23	ug/L <23 ug/L
8270D_SIM 6020B	193-39-5 7439-89-6		Indeno[1,2,3-cd]pyrene	Total Dissolved	0.25 1400	NC NC	0.4 NC	<0.020 36	ug/L <0.020 ug/L ug/L J 38 ug/L	<0.020 ug/L J 32 ug/L	<0.021 ug/L J 35 ug/L J	<0.020 ug/L J	<0.020 ug/L 62 ug/L	<0.020 38	ug/L
8260D_LL	98-82-8	Water	Isopropylbenzene	Total	45	NC	NC	<0.080	ug/L <0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080	ug/L <0.080 ug/L
6020B 6020B	7439-92-1 7439-95-4		Lead Magnesium	Dissolved Dissolved	15 NC	65 NC	15 NC	<0.12 2400		<0.12 ug/L 2400 ug/L	<0.12 ug/L 2500 ug/L	<0.12 ug/L 2400 ug/L	<0.12 ug/L 2300 ug/L	<0.12 2300	ug/L <0.12 ug/L ug/L 2400 ug/L
6020B	7439-96-5	Water	Manganese	Dissolved	43	NC	NC	3.3	ug/L 1.4 ug/L	J 4.3 ug/L	1.3 ug/L J	6.9 ug/L	29 ug/L	2.9	ug/L 2.1 ug/L
7470A 8260D LL	7439-97-6 79-20-9		Mercury Methyl acetate	Dissolved Total	2 NC	1.4 NC	2 NC	<0.079 <0.20		J 0.085 ug/L <0.20 ug/L	J <0.079 ug/L <0.20 ug/L	<0.079 ug/L <0.20 ug/L	<0.079 ug/L <0.20 ug/L	0.089 <0.20	
8260D_LL	1634-04-4	Water	Methyl tertiary butyl ether	Total	20	NC	NC	<0.080	ug/L <0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080 ug/L	<0.080	ug/L <0.080 ug/L
8260D_LL 8260D_LL	108-87-2 75-09-2	Water Water	Methylcyclohexane Methylene Chloride	Total Total	NC 5	NC NC	NC 5	<0.10 <0.20		<0.10 ug/L <0.20 ug/L	<0.10 ug/L <0.20 ug/L	<0.10 ug/L <0.20 ug/L	<0.10 ug/L <0.20 ug/L	<0.10 <0.20	
8270D_SIM	91-20-3	Water	Naphthalene	Total	0.17	NC	NC	<0.031	ug/L <0.030 ug/L	<0.030 ug/L	<0.031 ug/L	<0.030 ug/L	<0.030 ug/L	<0.030	ug/L <0.030 ug/L
6020B 8082A LL	7440-02-0 12674-11-2		Nickel PCB-1016	Dissolved Total	39 0.14	470 0.014*	NC 0.5**	0.54 < 0.0077		J 0.47 ug/L <0.0090 ug/L	J <0.40 ug/L <0.0086 ug/L	0.44 ug/L J <0.0087 ug/L	0.52 ug/L J <0.0087 ug/L	0.42 <0.0086	
8082A_LL	11104-28-2	Water	PCB-1221	Total	0.0047	0.014*	0.5**	<0.0077	ug/L <0.0092 ug/L	<0.0090 ug/L	<0.0086 ug/L	<0.0087 ug/L	<0.0087 ug/L	<0.0086	ug/L <0.0090 ug/L
8082A_LL 8082A_LL	11141-16-5 53469-21-9		PCB-1232 PCB-1242	Total Total	0.0047 0.0078	0.014* 0.014*	0.5** 0.5**	<0.0077 <0.0077		<0.0090 ug/L <0.0090 ug/L	<0.0086 ug/L <0.0086 ug/L	<0.0087 ug/L <0.0087 ug/L	<0.0087 ug/L <0.0087 ug/L	<0.0086 <0.0086	
8082A_LL	12672-29-6	Water	PCB-1248	Total	0.0078	0.014*	0.5**	<0.0077	ug/L <0.0092 ug/L	<0.0090 ug/L	<0.0086 ug/L	<0.0087 ug/L	<0.0087 ug/L	<0.0086	ug/L <0.0090 ug/L
8082A_LL	11097-69-1	Water	PCB-1254	Total	0.0078	0.014*	0.5**	<0.0048	ug/L <0.0058 ug/L	<0.0056 ug/L	<0.0054 ug/L	<0.0054 ug/L	<0.0054 ug/L	<0.0054	ug/L <0.0056 ug/L

Basin DA-11 Water Sample Results. June 4, 2024

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8082A_LL	11096-82-5 Water	PCB-1260	Total	0.0078	0.014*	0.5**	<0.0048 ug/L		<0.0058 ug/L		<0.0056	ug/L		<0.0054	ug/L		<0.0054	ug/L	<0.	054 ug/L		<0.00	54 ug/L		<0.0056 ug	3/L	
9040C	N/A Water	рН	Total	NC	6.5-8.5	NC	7.2 S.U.	HF	7.1 S.U.	HF	7.2	S.U.	HF	7.2	S.U.	HF	7.2	S.U.	HF 7.1	S.U.		HF 7.0	S.U.	HF	7.1 S.	U.	HF
8270D_SIM	85-01-8 Water	Phenanthrene	Total	12	NC	NC	<0.031 ug/L		<0.030 ug/L		<0.030	ug/L		< 0.031	ug/L		<0.030	ug/L	<0.	30 ug/L		<0.03) ug/L		<0.030 ug	g/L	
6020B	7440-09-7 Water	Potassium	Dissolved	NC	NC	NC	2100 ug/L		2100 ug/L		2100	ug/L		2100	ug/L		2100	ug/L	200	ug/L		2000	ug/L		2000 ug	g/L	
8270D_SIM	129-00-0 Water	Pyrene	Total	12	NC	NC	<0.010 ug/L		<0.010 ug/L		< 0.010	ug/L		< 0.010	ug/L		<0.010	ug/L	<0.	10 ug/L		<0.01) ug/L		<0.010 ug	g/L	
6020B	7782-49-2 Water	Selenium	Dissolved	50	NC	50	<0.28 ug/L		<0.28 ug/L		<0.28	ug/L		<0.28	ug/L		<0.28	ug/L	<0.	8 ug/L		<0.28	ug/L		<0.28 ug	g/L	
6020B	7440-22-4 Water	Silver	Dissolved	9.4	3.2	9.4	<0.10 ug/L		<0.10 ug/L		<0.10	ug/L		<0.10	ug/L		<0.10	ug/L	<0.	0 ug/L		<0.10	ug/L		<0.10 ug	g/L	
6020B	7440-23-5 Water	Sodium	Dissolved	NC	NC	NC	3500 ug/L		3800 ug/L		3700	ug/L		3800	ug/L		3900	ug/L	360	ug/L		3700	ug/L		3700 ug	g/L	
8260D_LL	100-42-5 Water	Styrene	Total	100	NC	NC	<0.070 ug/L		<0.070 ug/L		< 0.070	ug/L		< 0.070	ug/L		<0.070	ug/L	<0.	70 ug/L		<0.07) ug/L		<0.070 ug	g/L	
9040C	N/A Water	Temperature	Total	NC	NC	NC	20.1 Degrees C	HF	20.1 Degrees C	HF	20.2	Degrees C	HF	20.2	Degrees C	HF	20.1	Degrees C	HF 20.	Degre	es C	HF 20.0	Degrees C	HF	20.0 De	egrees C	HF
8260D_LL	127-18-4 Water	Tetrachloroethene	Total	5	NC	5	<0.20 ug/L		<0.20 ug/L		<0.20	ug/L		<0.20	ug/L		<0.20	ug/L	<0.	0 ug/L		<0.20	ug/L		<0.20 ug	g/L	
6020B	7440-28-0 Water	Thallium	Dissolved	2	NC	2	<0.13 ug/L		<0.13 ug/L		0.20	ug/L	J	<0.13	ug/L		<0.13	ug/L	<0.	3 ug/L		<0.13	ug/L		<0.13 ug	g/L	
8260D_LL	108-88-3 Water	Toluene	Total	1000	NC	1000	<0.080 ug/L		<0.080 ug/L		<0.080	ug/L		<0.080	ug/L		<0.080	ug/L	<0.	80 ug/L		<0.08) ug/L		<0.080 ug	g/L	
8260D_LL	156-60-5 Water	trans-1,2-Dichloroethene	Total	100	NC	100	<0.10 ug/L		<0.10 ug/L		<0.10	ug/L		<0.10	ug/L		<0.10	ug/L	<0.	0 ug/L		<0.10	ug/L		<0.10 ug	g/L	
8260D_LL	10061-02-6 Water	trans-1,3-Dichloropropene	Total	NC	NC	NC	<0.080 ug/L		<0.080 ug/L		<0.080	ug/L		<0.080	ug/L		<0.080	ug/L	<0.	80 ug/L		<0.08) ug/L		<0.080 ug	g/L	
8260D_LL	79-01-6 Water	Trichloroethene	Total	5	NC	5	<0.080 ug/L		<0.080 ug/L		<0.080	ug/L		<0.080	ug/L		<0.080	ug/L	<0.	80 ug/L		<0.08) ug/L		<0.080 ug	g/L	
8260D_LL	75-69-4 Water	Trichlorofluoromethane	Total	NC	NC	NC	<0.10 ug/L		<0.10 ug/L		<0.10	ug/L		<0.10	ug/L		<0.10	ug/L	<0.	0 ug/L		<0.10	ug/L		<0.10 ug	g/L	
6020B	7440-62-2 Water	Vanadium	Dissolved	8.6	NC	NC	<0.79 ug/L		<0.79 ug/L		<0.79	ug/L		<0.79	ug/L		<0.79	ug/L	<0.	9 ug/L		<0.79	ug/L		<0.79 ug	g/L	
8260D_LL	75-01-4 Water	Vinyl chloride	Total	2	NC	3	<0.10 ug/L		<0.10 ug/L		<0.10	ug/L		<0.10	ug/L		<0.10	ug/L	<0.	0 ug/L		<0.10	ug/L		<0.10 ug	g/L	
8260D LL	1330-20-7 Water	Xylenes, Total	Total	10000	NC	2	<0.070 ug/L		<0.070 ug/L		<0.070	ug/L		< 0.070	ug/L		<0.070	ug/L	<0.	70 ug/L		<0.07) ug/L		<0.070 ug	g/L	
6020B	7440-66-6 Water	Zinc	Dissolved	600	120	NC	<4.0 ug/L		<4.0 ug/L		<4.0	ug/L	i	<4.0	ug/L		<4.0	ug/L	<4.	ug/L		<4.0	ug/L		<4.0 us	g/L	

^{*0.014} ug/L is the aquatic life - chronic criteria for Total PCBs

**0.5 ug/L is the drinking water MCL for Total PCBs.

Results first compared to MCLs, then AWQCFA and MD LRP Cleanup Criteria if MCLs are not available.

Per the soil management plan, free cyanide would also be compared to the chronic AWQ criteria of 0.0052 mg/L, if discharging directly to surface water.

This table presents combined standards as specified by both MDE LMA and WSA. For LMA, results are compared to MCL and where there is no MCL to GWCS. For WSA, results are compared to lower of MCL and acute FW

Bold values indicate the analyte was detected Qualifier Definitions

1 - Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value
HF - Parameter with a holding time of 15 minutes. Test performed by the laboratory at client's request. Sample was analyzed outside of hold time.
*1 - LCS/LCSD RPD Exceeds Control Limits

	Client Name: Tetra Lab: Eurofins Lanca	Tech Inc - Germanto	wn																		
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	8260D_LL	78-87-5	Water	1,2-Dichloropropane	Total	5	NC	5		ug/L	<			<0.10	-	<0.10	ug/L	<0.10 ug/L			
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Company Comp	6020B	7440-36-0	Water	Antimony	Dissolved	6	NC	6		ug/L	<			<0.20	-	<0.20	ug/L	<0.20 ug/L			
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\$250 U. \$7.66-7				Chlorobenzene	Total			100		ug/L		ų.			-		ug/L	, J.			
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2500 L. 2001-01-3 Water C1-3-2-0-th/loropropene Total N.C.	8270D_SIM	218-01-9	Water	Chrysene	Total	25	NC	0.2	_	ug/L					-	<0.010	ug/L				
2740 284 Water Constet Con				,						-					-		-	, , , , , , , , , , , , , , , , , , ,		Ŭ,	
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S2700 SIM S47-03 Water Dibent(a)Ananthracene Total 0.025 NC 0.3 0.020 ug/L 0.021 ug/L 0.020 ug/L		· '							_					_		_	-			-	
2500 1 124-8-1 Water Obcomochromethane Total 80 NC NC 40.080 Ug/L 40.0				, , , , , , , , , , , , , , , , , , ,						- 0,					-		O,	, J.		Ŭ,	
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Second 1.0 1.0 1.4 Water Sthylenzene Total Tot										U.							O,	, J.			
8011 106-93-4 Water Ethylene Dibromide (1,2-dibromomethane) Total 0.05 NC 0.5 0.095 0g/L 0.0093 0g/L 0.0093 0g/L 0.0094 0g/L												, ,			-		-	, J.		Ŭ,	
S270D_SIM 206-44-0 Water Fluoranthene Total 80 NC NC 4.0.010 ug/L 4.0.011 ug/L 4.0.010 ug/L 4.0				,										_		_					
STOD_SIM 36-73-7 Water Fluorine Freon 113 NC NC NC NC NC NC NC N										-				_	-		-		1		
16984-48-8 Water Fluoride Fluoride Fluoride Total NC NC 4 0.73 mg/L 0.73 mg/L 0.67 mg/L 0.66 mg/L 0.66 mg/L 0.66 mg/L 0.67 mg/L 0.20 m										ug/L						_	-		<u>L</u>		
S015D_GRO N/A Water GRO Total 47 NC NC <23 ug/L <24 ug/L <23 ug/L <23 ug/L <23 ug/L <23 ug/L <24 ug/L	300_ORGFM_28D	16984-48-8		<u> </u>		NC			0.73		0	0.73 mg/L		0.67	mg/L			0.66 mg/L		0.77 mg/	L L
Secondary Seco				<u> </u>						Ü,				_	-		O,	U.			
Figure F										Ü,		, ,			-		O,	, J.		Ŭ,	
Second S			_						24	-				_	-	_	-		J		
6020B 7439-92-1 Water Lead Dissolved 15 65 15 <0.12 ug/L <0.12 ug/				Isopropylbenzene					<0.080	U.					-		O,	- 0,		- 0,	
6020B 7439-96-5 Water Manganese Dissolved 43 NC NC 3.6 ug/L 6.2 ug/L 5.5 ug/L 7.7 ug/L 19 ug/L 35 ug/L 7470A 7439-97-6 Water Mercury Dissolved 2 1.4 2 <0.079 ug/L				<u> </u>					_												
7470A 7439-97-6 Water Mercury Dissolved 2 1.4 2 <0.079 ug/L <0.079										-				_		_	-		 		
8260D_LL 79-20-9 Water Methyl acetate Total NC NC NC <0.20 ug/L												, ,			-		-	, J.	1	Ŭ,	
				·											-						
			Water	Methyl tertiary butyl ether	Total				_					_		_	-				

Basin DA-2 Water Sample Results. June 5, 2024

8260D_LL	108-87-2	Water	Methylcyclohexane	Total	NC	NC	NC	<0.10 ug	g/L		<0.10	ug/L													
8260D_LL	75-09-2	Water	Methylene Chloride	Total	5	NC	5	<0.20 ug	g/L		<0.20	ug/L													
8270D_SIM	91-20-3	Water	Naphthalene	Total	0.17	NC	NC	<0.030 ug,	g/L		<0.032	ug/L		<0.030	ug/L		<0.031	ug/L		<0.030	ug/L		<0.030	ug/L	
6020B	7440-02-0	Water	Nickel	Dissolved	39	470	NC	0.48 ug,	g/L	J	<0.40	ug/L		<0.40	ug/L		<0.40	ug/L		0.44	ug/L	J	0.60	ug/L J	
8082A_LL	12674-11-2	Water	PCB-1016	Total	0.14	0.014*	0.5**	<0.011 ug,	g/L		<0.0091	ug/L		<0.0089	ug/L		<0.0096	ug/L		<0.0091	ug/L		<0.0093	ug/L	
8082A_LL	11104-28-2	Water	PCB-1221	Total	0.0047	0.014*	0.5**	<0.011 ug,	g/L		<0.0091	ug/L		<0.0089	ug/L		<0.0096	ug/L		<0.0091	ug/L		<0.0093	ug/L	
8082A_LL	11141-16-5	Water	PCB-1232	Total	0.0047	0.014*	0.5**	<0.011 ug,	g/L		<0.0091	ug/L		<0.0089	ug/L		<0.0096	ug/L		<0.0091	ug/L		<0.0093	ug/L	
8082A_LL	53469-21-9	Water	PCB-1242	Total	0.0078	0.014*	0.5**	<0.011 ug,	g/L		<0.0091	ug/L		<0.0089	ug/L		<0.0096	ug/L		<0.0091	ug/L		<0.0093	ug/L	
8082A_LL	12672-29-6	Water	PCB-1248	Total	0.0078	0.014*	0.5**	<0.011 ug,	g/L		<0.0091	ug/L		<0.0089	ug/L		<0.0096	ug/L		<0.0091	ug/L		<0.0093	ug/L	
8082A_LL	11097-69-1	Water	PCB-1254	Total	0.0078	0.014*	0.5**	<0.0070 ug,	g/L		<0.0057	ug/L		<0.0056	ug/L		<0.0060	ug/L		<0.0057	ug/L		<0.0058	ug/L	
8082A_LL	11096-82-5	Water	PCB-1260	Total	0.0078	0.014*	0.5**	<0.0070 ug,	g/L		0.014	ug/L		<0.0056	ug/L		<0.0060	ug/L		<0.0057	ug/L		<0.0058	ug/L	
9040C	N/A	Water	рН	Total	NC	6.5-8.5	NC	7.0 S.U	U.	HF	7.1	S.U.	HF	7.4	S.U.	HF	7.3	S.U.	HF	7.3	S.U.	HF	7.2	S.U. HF	
8270D_SIM	85-01-8	Water	Phenanthrene	Total	12	NC	NC	<0.030 ug	g/L		<0.032	ug/L		<0.030	ug/L		<0.031	ug/L		<0.030	ug/L		<0.030	ug/L	
6020B	7440-09-7	Water	Potassium	Dissolved	NC	NC	NC	2300 ug,	g/L		2300	ug/L		2400	ug/L		2400	ug/L		2400	ug/L		2500	ug/L	
8270D_SIM	129-00-0	Water	Pyrene	Total	12	NC	NC	<0.010 ug	g/L		<0.011	ug/L		<0.010	ug/L										
6020B	7782-49-2	Water	Selenium	Dissolved	50	NC	50	<0.28 ug	g/L		<0.28	ug/L													
6020B	7440-22-4	Water	Silver	Dissolved	9.4	3.2	9.4	<0.10 ug	g/L		<0.10	ug/L		<0.10	ug/L		0.11	ug/L	J	0.14	ug/L	J	<0.10	ug/L	
6020B	7440-23-5	Water	Sodium	Dissolved	NC	NC	NC	9900 ug,	g/L		9900	ug/L		9900	ug/L		9900	ug/L		10000	ug/L		9900	ug/L	
8260D_LL	100-42-5	Water	Styrene	Total	100	NC	NC	<0.070 ug	g/L		<0.070	ug/L													
9040C	N/A	Water	Temperature	Total	NC	NC	NC	20.3 De	egrees C	HF	20.2	Degrees C	HF	20.2	Degrees C	HF	20.4	Degrees C	HF	20.3	Degrees C	HF	20.3	Degrees C HF	
8260D_LL	127-18-4	Water	Tetrachloroethene	Total	5	NC	5	<0.20 ug,	g/L		<0.20	ug/L													
6020B	7440-28-0	Water	Thallium	Dissolved	2	NC	2	<0.13 ug,	g/L		<0.13	ug/L													
8260D_LL	108-88-3	Water	Toluene	Total	1000	NC	1000	<0.080 ug,	g/L		<0.080	ug/L		0.36	ug/L J										
8260D_LL	156-60-5	Water	trans-1,2-Dichloroethene	Total	100	NC	100	<0.10 ug,	g/L		<0.10	ug/L													
8260D_LL	10061-02-6	Water	trans-1,3-Dichloropropene	Total	NC	NC	NC	<0.080 ug,	g/L		<0.080	ug/L													
8260D_LL	79-01-6	Water	Trichloroethene	Total	5	NC	5	<0.080 ug,	g/L		<0.080	ug/L													
8260D_LL	75-69-4	Water	Trichlorofluoromethane	Total	NC	NC	NC	<0.10 ug,	g/L		<0.10	ug/L													
6020B	7440-62-2	Water	Vanadium	Dissolved	8.6	NC	NC	<0.79 ug,	g/L	•	<0.79	ug/L		<0.79	ug/L										
8260D_LL	75-01-4	Water	Vinyl chloride	Total	2	NC	2	<0.10 ug	g/L		<0.10	ug/L													
8260D_LL	1330-20-7	Water	Xylenes, Total	Total	10000	NC	10000	<0.070 ug	g/L		<0.070	ug/L													
6020B	7440-66-6	Water	Zinc	Dissolved	600	120	600	<4.0 ug,	g/L		<4.0	ug/L													

Page 2 of 2

Per the soil management plan, free cyanide would also be compared to the chronic AWQ criteria of 0.0052 mg/L, if discharging directly to surface water.

This table presents combined standards as specified by both MDE LMA and WSA. For LMA, results are compared to MCL and where there is no MCL to GWCS. For WSA, results are compared to lower of MCL and acute FW.

Bold values indicate the analyte was detected

Qualifier Definitions

 $^{*0.014 \}text{ ug/L}$ is the aquatic life - chronic criteria for Total PCBs

^{**0.5} ug/L is the drinking water MCL for Total PCBs.

Results first compared to MCLs, then AWQCFA and MD LRP Cleanup Criteria if MCLs are not available.

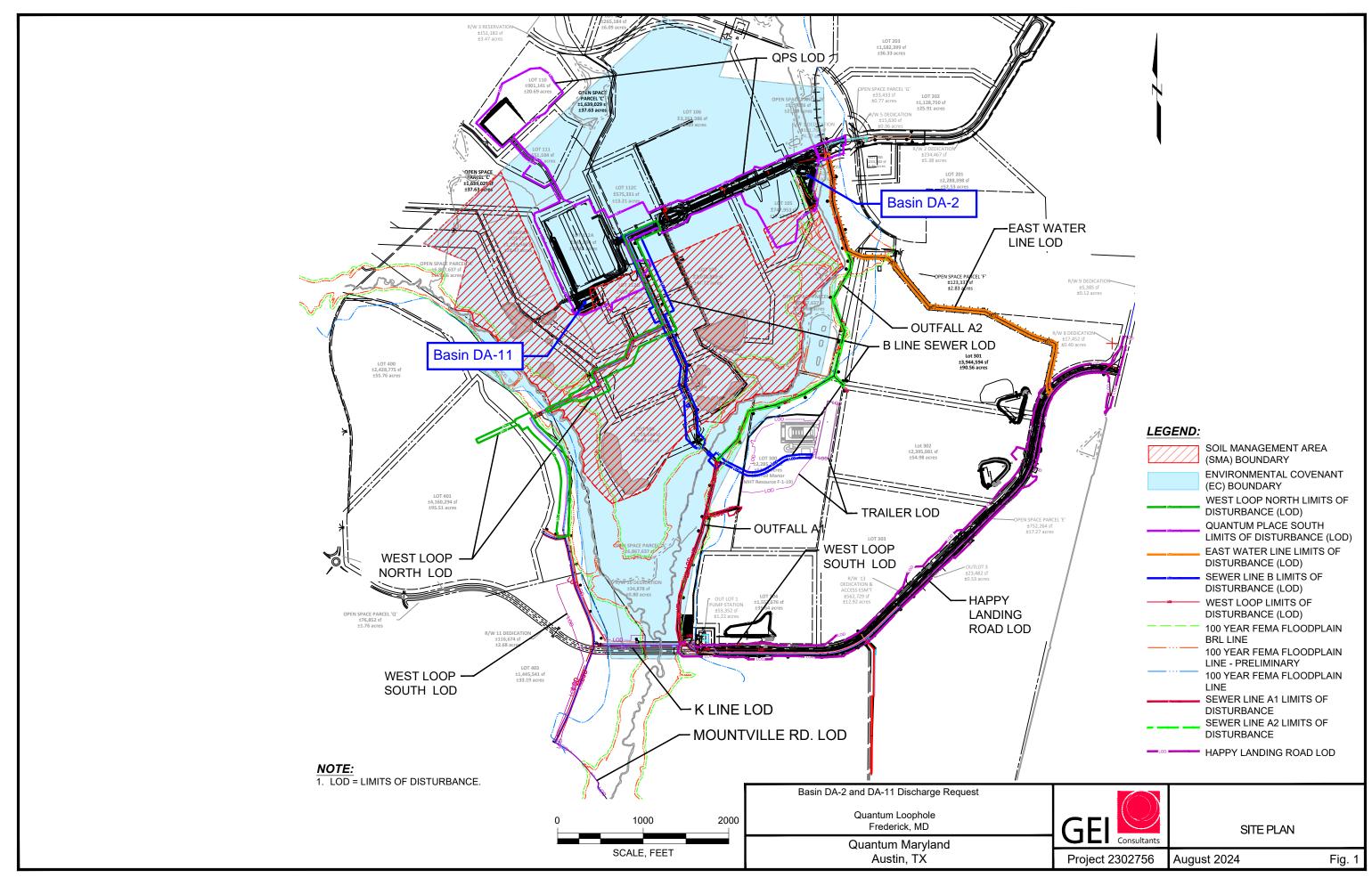
J - Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value

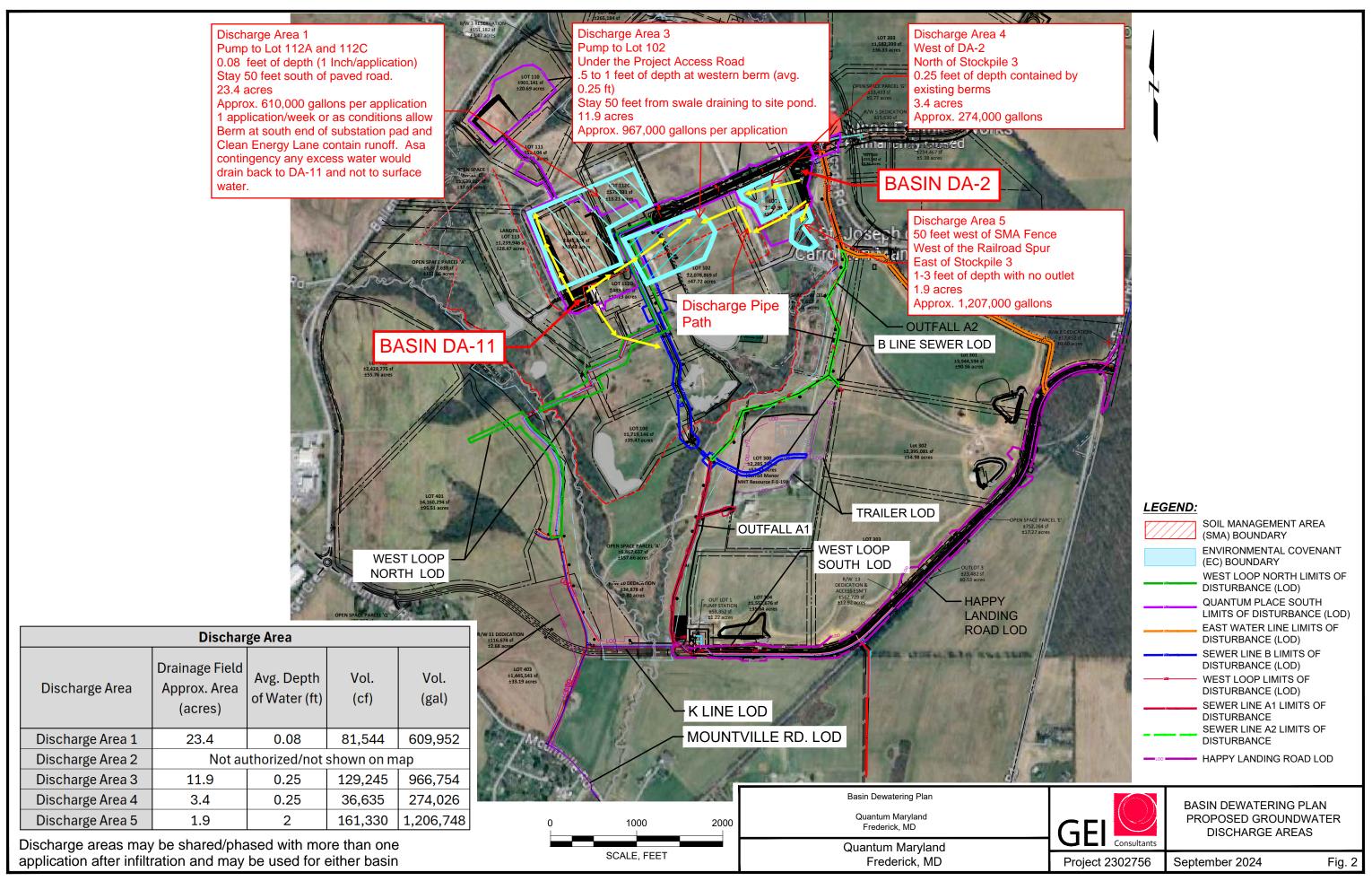
HF - Parameter with a holding time of 15 minutes. Test performed by the laboratory at client's request. Sample was analyzed outside of hold time.

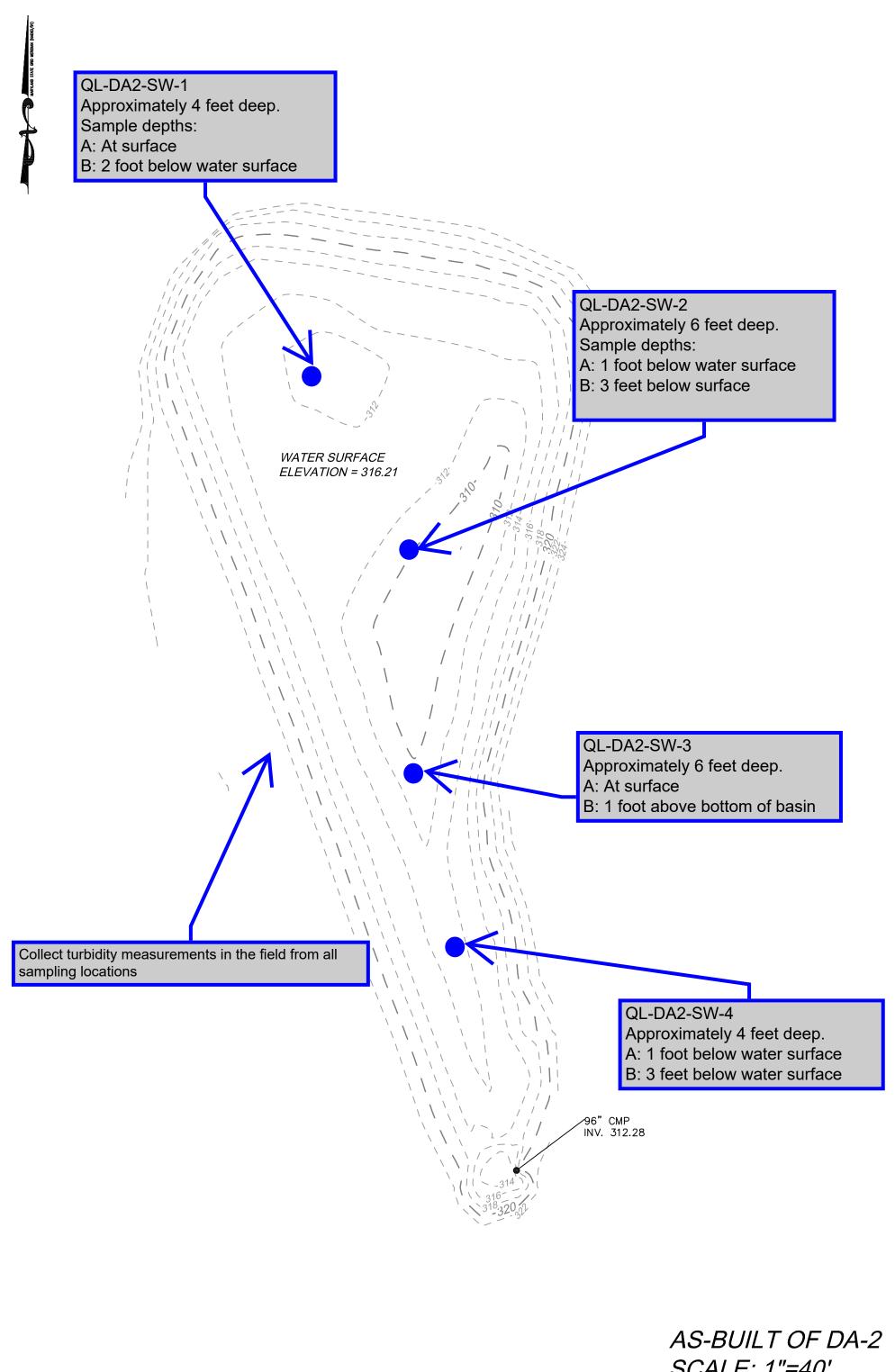
^{*1 -} LCS/LCSD RPD Exceeds Control Limits

Figures

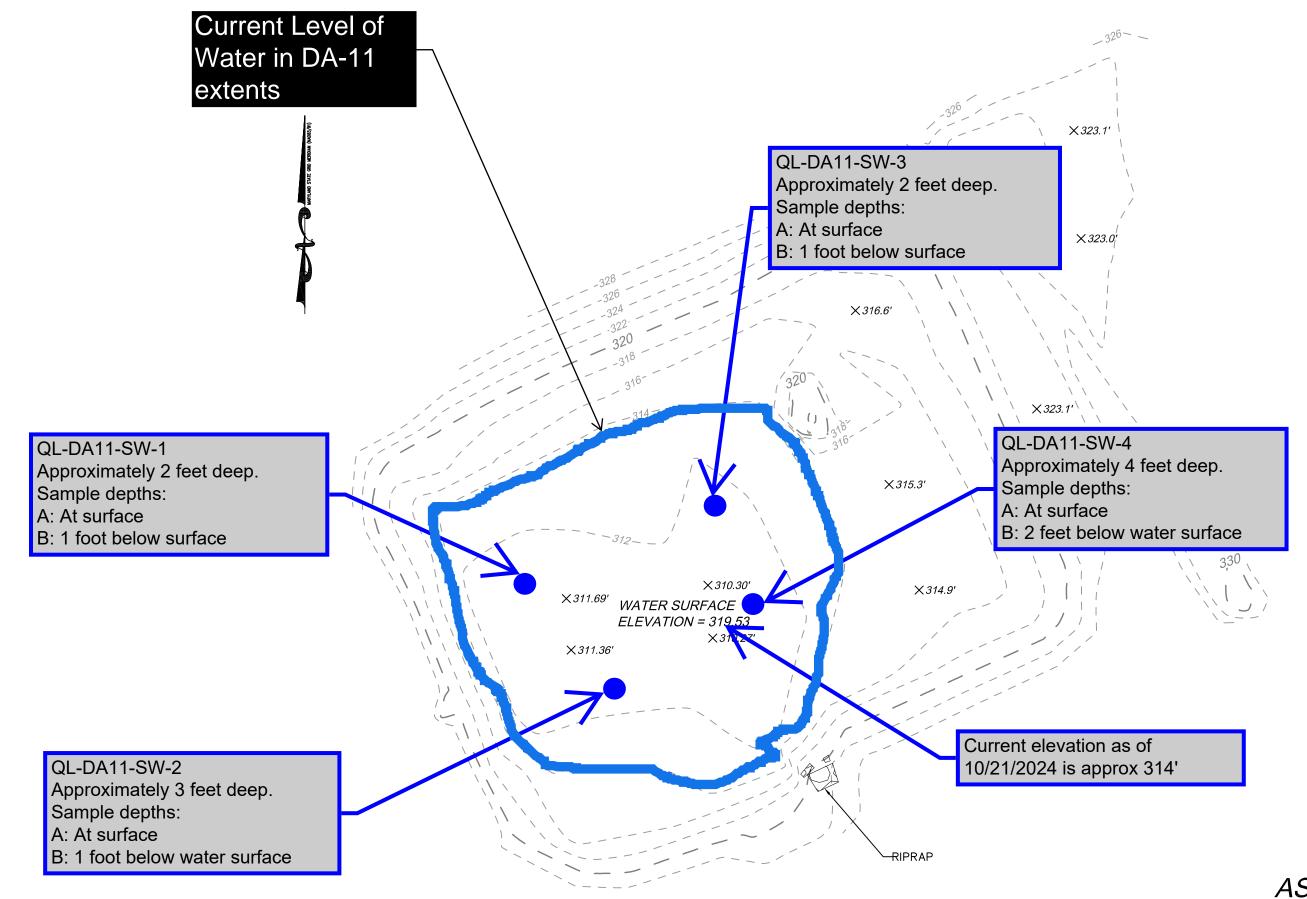
- 1. Site Plan
- 2. Proposed Groundwater Discharge Areas
- 3. Proposed DA-2 Sample Location Plan
- 4. Proposed DA-11 Sample Location Plan







SCALE: 1"=40'



AS-BUILT OF DA-11 SCALE: 1"=40'

Attachment 1

Basin DA-11	Storage	Capacity	and	Elevation	Survey
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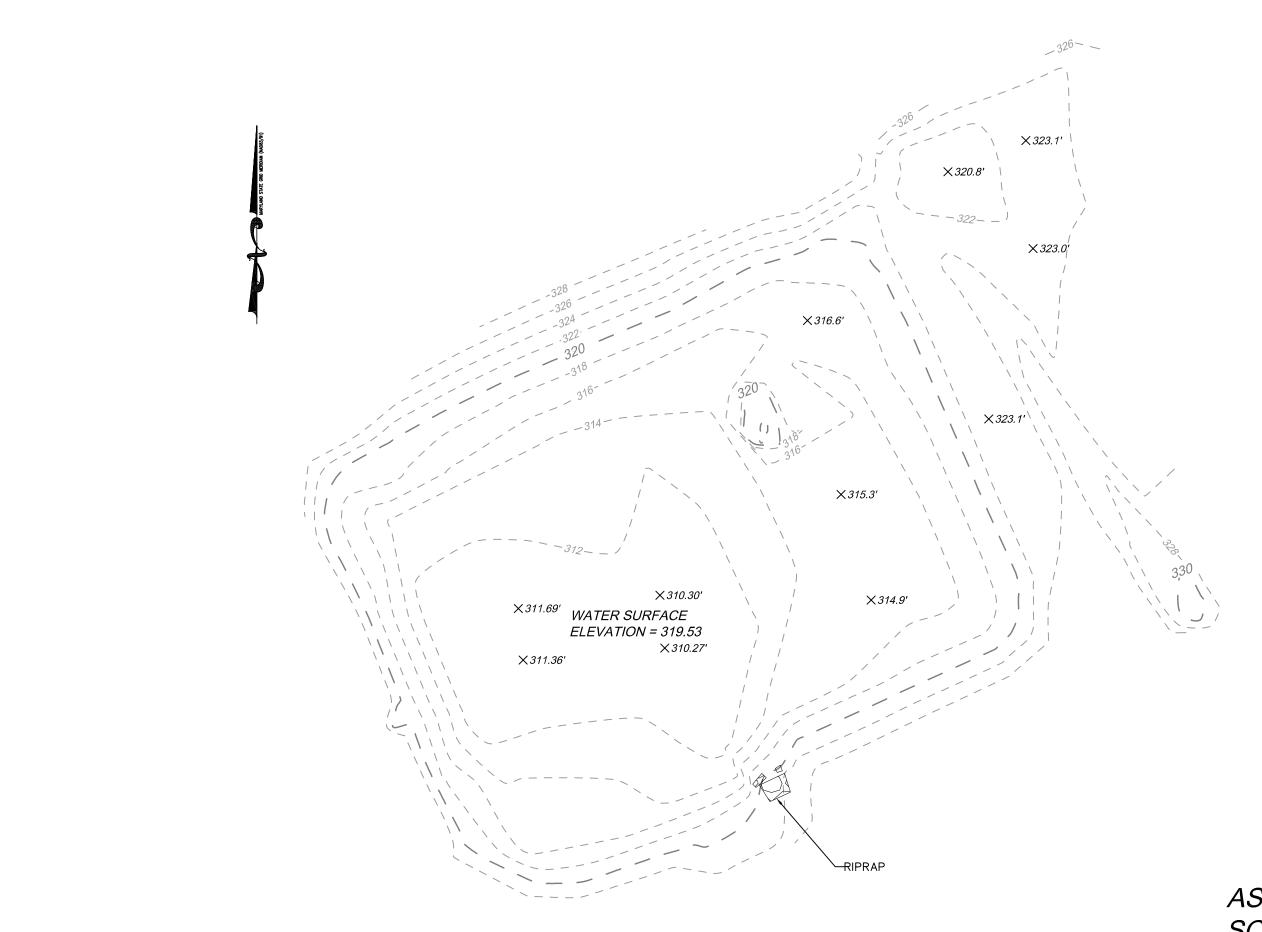
Project :

Quantum Frederick

Computed By: ACS
Date: 04/05/24

BASIN DA-11 ELEVATION - STORAGE TABLE Basin As-Built 2/05/24

ELEV.	AREA	AVG.	ELEV.	INTERVAL	ACCUM.
		AREA	INTERVAL	STORAGE	STORAGE
FT.	S.F.	S.F.	FT.	C.F.	C.F.
311	4,695				0
		7,702	1	7,702	
312	10,709				7,702
		12,853	1	12,853	
313	14,996				20,554
		17,658	1	17,658	
314	20,320				38,212
		23,482	1	23,482	
315	26,645				61,694
		29,537	1	29,537	
316	32,429				91,231
		35,281	1	35,281	
317	38,134				126,512
		40,071	1	40,071	
318	42,009				166,584
		44,011	1	44,011	
319	46,012				210,594
		47,478	1	47,478	
320	48,944				258,072
		50,337	1	50,337	
321	51,730				308,409
		53,130	1	53,130	
322	54,530				361,539



AS-BUILT OF DA-11 SCALE: 1"=40'

Attachment 2

Basin	DA-2	Storage	Capacity	and	Elevation	Survey
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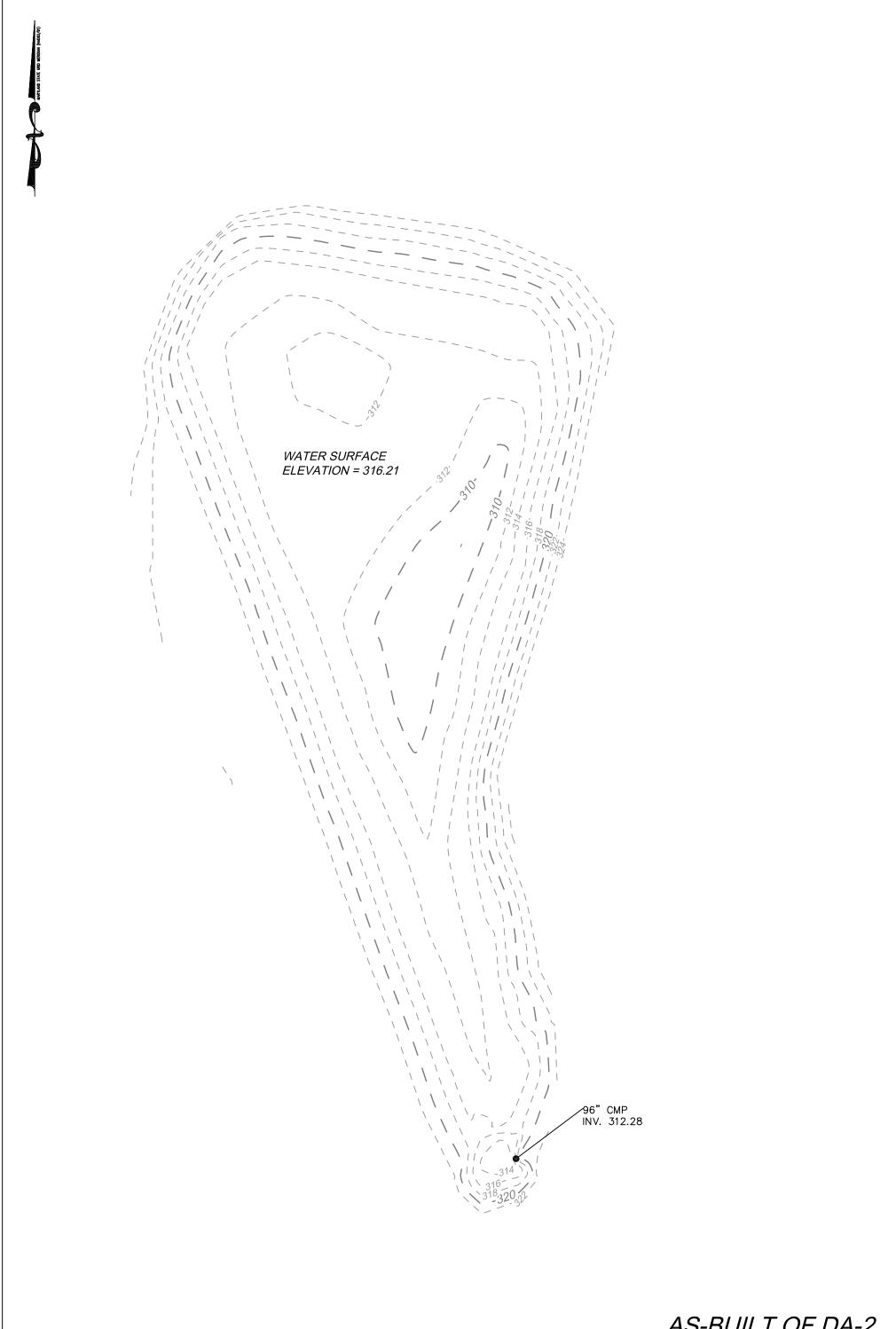
Project :

Quantum Frederick

Computed By: ACS
Date: 04/05/24

BASIN DA-2 ELEVATION - STORAGE TABLE Basin As-Built 2/05/24

ELEV.	AREA	AVG.	ELEV.	INTERVAL	ACCUM.
		AREA	INTERVAL	STORAGE	STORAGE
FT.	S.F.	S.F.	FT.	C.F.	C.F.
309	1,568				0
		2,434	1	2,434	
310	3,299				2,434
		4,324	1	4,324	
311	5,349				6,758
		6,579	1	6,579	
312	7,808				13,337
		12,782	1	12,782	
313	17,755				26,118
		20,918	1	20,918	
314	24,080				47,036
		26,967	1	26,967	
315	29,853				74,003
		32,815	1	32,815	
316	35,776				106,818
		37,589	1	37,589	
317	39,402				144,407
		40,766	1	40,766	
318	42,131				185,173
		43,491	1	43,491	
319	44,850				228,663
		46,217	1	46,217	
320	47,583				274,880
		48,954	1	48,954	
321	50,326				323,834
		51,736	1	51,736	
322	53,147				375,570



AS-BUILT OF DA-2 SCALE: 1"=40'

Attachment 3

WSA Process for Data Analysis and Review of Quantum Loophole DA-2 & DA-11 Standing Pool

WSA Process for Data Analysis and Review of Quantum Loophole DA-2 & DA-11 Standing Pool Water (10/21/2024)

*Item 8 further defines criteria for resuming frac tank collection.

- 1) Provide a minimum of 8 samples from representative locations and depths from each pond (DA-11 & DA-2). The June samples shall not be included.
- 2) Analyze for full set of analytes expected using detection sufficiently sensitive test methods. At a minimum test for:
 - *Specify Test Method specified in Part III.C.8.e of the 20CP.

	Aquatic Life - Acute	Drinking Water MCL
fluoride		4000 ug/l
aluminum	1100 ug/l	
benzo(a)pyrene		0.2 ug/l
antimony		6.0 ug/l
nickel	470 ug/l	
cyanide (free)	22 ug/l	200 ug/l
cadmium	1.8 ug/l	5 ug/l
chromium Total		100 ug/l
Total PCB	0.014 ug/l (chronic)	0.5 ug/l
рН	6.5-8.5	
VOC - PCE		5 ug/L
lead	65 ug/l	15 ppb
copper	13 ug/l	1300 ug/l

3) The

water should have no discernible odor or oil sheen.

- 4) The results should then be reported using Form 2C: https://mde.maryland.gov/programs/permits/WaterManagementPermits/Documents/www. mde.state.md.us/assets/document/permit/3510-2C.pdf
- 5) Present the dataset, with a map, to MDE through the ePermits website.
 - a) Instructions: Upload as an attachment similar to uploading turbidity reports.
 - b) Instructions:email us in permitting to verify it is ready for review.
- 6) We will analyze this as compared to: The Numerical Criteria for Toxic Substances in Surface Waters are provided in the Code of Maryland Regulations (COMAR) Section 26.08.02.03-2 acute criteria. They can be accessed through the web at: https://dsd.maryland.gov/regulations/Pages/26.08.02.03-2.aspx. We will also analyze

this as compared to our safe drinking standards for fluoride: https://www.epa.gov/ground-water-and-drinking-water/national-primary-drinking-water-regulations. Additionally, we screen for DRO using Soil and Groundwater Cleanup Standards.

- 7) MDE will provide you with a confirmation email that this is either uncontaminated (falls below the State's water criteria) or if it is considered contaminated.
 - a) If uncontaminated, you will be able to use this for dust suppression, landscape watering, fire suppression or other uses as provided in the construction stormwater permit, including return to the ground through surface infiltration. Surface water discharge is not authorized.
 - b) If contaminated, you will need to haul to a treatment plant.
- 8) This procedure should be followed for initial dewatering of the DA-2 & DA-11 standing pool. Drawdown should be taken from the surface or no deeper than 1 foot of depth. For each foot of drawdown, samples of turbidity, fluoride and cyanide must be taken to determine if these are increasing. An increase would indicate an interaction with groundwater and at that point all water must be containerized and then follow the same process used for frac tank processing. Containerization of groundwater and testing procedures as outlined in the July 15, 2024 WSA document must be followed through the duration of pond construction.
- 9) The above procedure should be followed in addition to requirements of the MDE Land and Materials Administration and the applicable Environmental Management Plan.