

# ROD AND WIRE MILL ANNUAL INTERIM MEASURE 2022 PROGRESS REPORT

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SPARROWS POINT, MARYLAND

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## 1.0 INTRODUCTION

This Progress Report has been prepared by ARM Group LLC (ARM) which presents the 2022 Interim Measures (IMs) conducted for the Rod and Wire Mill (RWM) located at the Tradepoint Atlantic (TPA) property. This report includes:

- a brief history of the Rod and Wire Mill Area,
- a description of historical interim measures that operated at the RWM,
- a description of additional remedial efforts that were completed in 2016 and 2017 to treat soil and groundwater in the RWM area,
- the groundwater flow patterns and contaminant distribution, and
- an evaluation of the effectiveness of the interim measure to date.

### 1.1. TRADEPOINT ATLANTIC SITE BACKGROUND

The Tradepoint Atlantic property is located in Baltimore County, Maryland at the southeastern corner of the Baltimore metropolitan area, approximately nine miles from the downtown area. The property encompasses approximately 3,100 acres located on a peninsula situated on the Patapsco River near its confluence with the Chesapeake Bay, physically positioned in the mouth of the heavily industrialized and urbanized Baltimore Harbor / Patapsco River region. A land connection to the northeast links the peninsula with the adjacent community of Edgemere.

From the late 1800s until 2012, the property was used for the production and manufacturing of steel. Iron and steel production operations and processes at the Site included raw material handling, coke production, sinter production, iron production, steel production, and semi-finished and finished product preparation. In 1970, Sparrows Point was the largest steel facility in the United States, producing hot and cold rolled sheets, coated materials, pipes, plates, and rod and wire. The steelmaking operations at the facility ceased in fall 2012, and current plans for the Site include demolition and redevelopment over the next several years. Some portions of the site have already undergone remediation and/or redevelopment.

The original topography of the peninsula was flat with elevations not exceeding 15 feet based on the North American Vertical Datum 1988 (NAVD88). The peninsula has been significantly altered since the inception of steel manufacturing activities. Creeks have been filled in and new land has been added to various areas of the Site by building up near-shore areas of the river.

### 1.2. SITE OWNERSHIP HISTORY

Bethlehem Steel Corporation operated an integrated steelmaking facility at the site from approximately 1916 through 2003. As a result of multiple market factors, Bethlehem Steel declared bankruptcy in 2001 and the facility was subsequently operated by a succession of owners, the last of which (RG Steel Sparrows Point, LLC) filed for bankruptcy in 2012. The site was subsequently

purchased by Sparrows Point, LLC (SPLLC) at a bankruptcy sale on August 7, 2012. Sparrows Point Terminal, LLC (SPT) purchased the real property on September 18, 2014. SPT has subsequently undergone a name change and is now doing business as Tradepoint Atlantic.

### **1.3. REGULATORY PROCESS**

Environmental responses for the RWM and for the site in general are being implemented pursuant to the following:

- Multi-Media Consent Decree (Decree) between Bethlehem Steel Corporation, the United States Environmental Protection Agency (EPA), and the Maryland Department of the Environment (MDE) (effective October 8, 1997); this Decree has been modified in accordance with a stipulated order entered into by Sparrows Point LLC and the respective agencies effective July 28, 2014;
- Administrative Consent Order (ACO) between Sparrows Point Terminal, LLC, and the Maryland Department of the Environment (effective September 12, 2014); and,
- Settlement Agreement and Covenant Not to Sue (SA) between Sparrows Point Terminal, LLC, and the United States Environmental Protection Agency (effective November 25, 2014).

The original Consent Decree for the Sparrows Point facility dealt with many issues associated with ongoing iron-making, steel-making, coking, byproduct, plating, and finishing operations. To the extent that these operations are no longer conducted, and the associated facilities no longer exist, many specific requirements of the Decree are no longer applicable and have been removed in accordance with the stipulated order implementing modifications to the Decree. The RWM is part of the acreage that remains subject to the requirements of the Decree as documented in correspondence received from EPA on September 12, 2014.

## 2.0 ROD AND WIRE MILL

### 2.1. SITE DESCRIPTION

#### 2.1.1. Historical RWM Industrial Activities

The RWM (the Site) is located in the northwestern portion of the Tradepoint Atlantic property. This area has also been given the designation of Parcel A3, as the Tradepoint Atlantic property as a whole has been divided into several separate parcels. Parcel A3 (the RWM), is shown in **Figure 1**.

The RWM is the location of the former mill that produced rods and wire products from the 1940s to the early 1980s. All manufacturing activities at the RWM ceased operation in the early 1980s with subsequent demolition of all structures between 1994 and 2000, based on historical aerial photos.

Manufacturing activities at the RWM included leaching of zinc ore and a subsequent treatment process to remove cadmium impurities. The leaching process was implemented in large tanks located inside the north end of the former RWM building. From the 1950s, the acidic leach residue was stored in the Northwest Pond until about 1959 when filters were utilized to dewater the residues. Dewatered sludge generated from this process was temporarily stored on the ground outside the north end of the mill in the Former Sludge Bin Storage Area. Filtrate from the dewatering process was recycled to the wire plating process. Excess filtrate was discharged to the East Pond until 1971, after which it was sent to the Humphrey Creek Wastewater Treatment Plant (HCWWTP) for treatment. These operations ended in the early 1980s when the Rod and Wire Mill was shut down. The former locations of the Northwest Pond, the Sludge Bin Storage Area, and the East Pond are shown in **Figure 2**.

#### 2.1.2. Site Geology/Hydrogeology

In general, the subsurface geology at the RWM includes slag fill materials overlying natural soils, which include fine-grained sediments (clays and silts) and coarse-grained sediments (sands). Groundwater occurrence at the Site has been segregated into three horizons identified as shallow, intermediate, and deep hydrogeologic zones.

The shallow hydrogeologic zone includes slag fill material or recent sedimentary deposits and the unconfined water table at the Site. Monitoring wells and piezometers designated as shallow are screened within this uppermost, unconfined water bearing unit. The “shallow” bottom-of-screen elevations generally range from +5 to -20 feet above mean sea level (amsl). In some areas of the Site, the slag fill is directly underlain by and hydrologically connected to, the coarser-grained beds or lenses within the Talbot Formation that comprise the Upper Talbot Channel Unit. In these areas, the slag fill and Upper Talbot Channel Units form a single groundwater flow system. In much of

the investigation area, the slag fill material is underlain by finer-grained silts and clays that comprise the Talbot Clay Aquitard. In these areas, shallow groundwater flow may be separated from groundwater in any underlying coarse-grained beds or lenses.

The intermediate hydrogeologic zone was the focus of the pump and treat interim measure formerly used at the Site (1986-1999/2001-2016) and is therefore also referred to as the intermediate pumping zone. The intermediate zone includes the unconfined to partially confined groundwater in the Pleistocene-aged Upper Talbot unit. The “intermediate” bottom-of-screen elevations range from approximately -20 to -50 feet amsl. The presence of clay and silt layers within the intermediate hydrogeologic zone likely retard the vertical recharge of groundwater from the upper fill material and Upper Talbot channel Unit.

The lower hydrogeologic zone includes the confined groundwater in the Lower Talbot or Upper Patapsco Sand unit. The “lower” bottom-of-screen elevations range from approximately -50 to -141 feet amsl. The lower hydrogeologic zone is not a primary focus of this groundwater investigation. Hydrogeologic zones at greater depth are known to exist based on a review of the regional geology; however, these deeper units are isolated from the upper three units and impacts associated with the former iron and steel operations have not been identified.

## **2.2. HISTORICAL INTERIM MEASURE FOR GROUNDWATER CONDITIONS**

The historical operations within the RWM resulted in releases of cadmium and zinc to soil and groundwater. In 1986, a soil and groundwater remediation program was initiated to address groundwater exhibiting elevated levels of cadmium and zinc, as well as residual soil contamination in the Sludge Bin Storage Area. Remediation initially consisted of a soil flushing program and associated pumping and treatment of groundwater from shallow and intermediate wells. The groundwater pumping was discontinued, and the treatment plant was dismantled in 1999 to support the demolition of the Rod and Wire Mill, allowing for reassessment of the interim measure. A Work Plan to re-establish interim measures was submitted to the reviewing agencies (MDE and EPA) in July 2000, and the Work Plan was approved in November 2000. Re-establishment of the interim measures included the following:

- Institutional controls for soils were established to provide a “Restricted Work Area” to control the exposure of onsite workers to soils in the Former Sludge Bin Storage Area.
- A groundwater monitoring network consisting of 31 wells was installed to monitor the performance of the groundwater pump and treat system. This monitoring network was used to collect water level and groundwater quality data.
- A groundwater pump and treat system was operated and maintained, which consisted of two intermediate zone recovery wells (RW10-PZM020 and RW15-PZM020) that removed water at a rate of between 5 and 12 gallons per minute (gpm). The expected normal operating rate for the treatment system was set at a combined rate of 8 to 12 gpm, with a maximum design flow of 25 gpm.



- Recovered groundwater was transported via a pipeline to the HCWWTP for subsequent treatment and discharge in accordance with the NPDES permit requirements for the facility.

The pumping and treatment of groundwater resumed in September 2001, and continued until September 2016, when it was stopped to support the construction activities at the RWM. In particular, the pumping wells and associated pumps, piping, and pipe racks were shut down and removed in order to install the alkaline charged remediation trenches. The remediation trenches were constructed between October and December 2017 (*Interim Measures Construction Report, In-Situ Groundwater Treatment*, Advanced GeoServices Corp, January 2018).

### 3.0 INTERIM MEASURES AND GROUNDWATER CONDITIONS

#### 3.1. INTERIM MEASURE REMEDIAL APPROACH

Advanced GeoServices (AGS) was contracted to design and install remediation trenches to serve as the interim measure for remediating groundwater at the RWM. The full details of the remediation design are presented in the AGS Work Plan, *Interim Measure Work Plan In-Situ Groundwater Treatment* (AGS, 2016). The primary purpose of this interim measure, which focused on groundwater in the intermediate zone, was to reduce concentrations of dissolved metals and to minimize contaminant discharges from this zone to surface water. In the IM design, the groundwater velocities were expected to be slow, in the range of 5 to 10 feet per year (later calculated to be less than five feet per year in the RWM Supplemental Investigation Report). Groundwater in the shallow zone was noted to have a higher pH compared to the intermediate zone due to the presence of slag fill, and as a result, the distribution of metals in the shallow zone groundwater indicates limited mobility (i.e., lack of migration). Therefore, the intermediate zone was the primary focus of the interim measure.

Groundwater extraction from the pumping wells ceased in September 2016 to support the construction of the remediation trenches. The objective of the remediation trenches is to address the elevated dissolved cadmium and zinc in the intermediate groundwater zone by precipitating the dissolved metals in-situ. This is achieved by raising the existing groundwater pH from approximately 4 to a range of 9.5 to 10 through the addition of alkaline reagents into the intermediate groundwater zone at select high concentration areas. To accomplish this, excavated soils were replaced with alkaline charges that react with acidic groundwater to create alkaline conditions within the aquifer and remove the dissolved cadmium and zinc from solution. The alkaline charges utilized a combination of fast acting TerrabondMG (40% by weight) in conjunction with limestone aggregate (60% by weight). The reagents were placed in trenches in a staggered/offset alignment perpendicular to the anticipated groundwater flow. A typical cross-section of a remediation trench is provided as **Figure 3** and the approximate locations of the trenches are shown on the various maps provided as part of this report.

Paving at the RWM, completed around the end of March 2018, has reduced aquifer recharge from precipitation. While the whole Site is not paved, and it is possible there is some recharge to the intermediate zone via shallow zone groundwater draining through the trenches, the potentiometric surface is nearly flat in the intermediate zone. A lack of gradient in the intermediate zone results in a slow groundwater velocity which controls the rate of treatment by the trenches. As part of creating an updated conceptual site model in the Rod and Wire Mill Interim Measure Supplemental Investigation Report (ARM, Revision 1 dated April 8, 2020), lateral groundwater flow velocities were calculated based on groundwater level measurements in May 2019. Groundwater flow velocity was calculated at 33.8 ft/year in the shallow zone and

4.94 ft/year in the intermediate zone. Details of these calculations can be found in the Rod and Wire Mill Interim Measure Supplemental Investigation Report (ARM 2020a).

Approximately 2,392 cubic yards of contaminated soil were removed from the RWM during construction of the trenches and disposed of at an offsite facility. Construction of the trenches was completed in January 2017.

The interim groundwater treatment goals are to increase the pH in the intermediate groundwater zone in order to precipitate the dissolved metals and achieve a reduction in dissolved concentrations of cadmium and zinc within and downgradient of the source areas. Ultimately the treatment goal is to demonstrate that the concentrations of the primary contaminants (cadmium and zinc) in groundwater discharging at the shoreline/property boundary are acceptable.

### 3.2. GROUNDWATER WELL NETWORK

In 2022, the monitoring network for the shallow and intermediate zones at the Site included 76 wells. Well construction details for all wells are included in **Table 1**. A “well pair” refers to one shallow zone well and one intermediate zone well installed very close to each other whose well names begin with the same prefix (e.g., RWA-MWS and RWA-MWI). Shallow zone wells have been assigned a well name ending in “-MWS” while intermediate zone wells have been assigned a well name ending in “-MWI”.

For the purposes of evaluating trends in groundwater, monitoring wells at the Site have been categorized into four groups:

- The “Upgradient” wells are located farthest upgradient, generally farthest to the east.
- The “Delineation” wells are located along the northern boundary of the site.
- The “Interior” wells are located in the central portion of the site. The Focused well pairs—RWJ, RWK, and RWL—are a subset of Interior wells that were installed directly adjacent to one of the trenches to help assess the trench performance. Proximity to the trench was very important due to the slow intermediate zone groundwater velocity calculated for the site.
- The “Perimeter” wells are generally located farthest to west (downgradient), running north-south.

Well categories are shown below in Table 3.2.1.

As detailed in the RWM Supplemental Investigation Report (ARM, 2020a), well pairs J – K – L were installed in close proximity to the western most trench in order to evaluate the trench performance. Well pair RWJ was installed directly adjacent to the trench. The other two well pairs (RWK and RWL) were installed progressively further from the RWJ pair in the southwestern direction, with the RWK pair approximately 10 feet away and the RWL pair approximately 25 feet

away. These three well pairs, along with the RW12 well pair (located immediately upgradient of the western-most trench and approximately colinear with the J-K-L pairs), are used to assess the near-field effect of one of the remediation trenches.

Groundwater samples were collected from all existing shallow and intermediate wells on a monthly basis from February 2017 up to January 2018. Following the January 2018 sampling event, groundwater samples were collected from all existing shallow and intermediate wells on a quarterly basis.

<b>Table 3.2.1 - Well Categories</b>			
<b>Upgradient</b>	<b>Delineation</b>	<b>Interior/Focused</b>	<b>Perimeter</b>
RW19-MWS/RW19-MWI	RW21-MWS/RW21-MWI	RW09-MWS/RW09-MWI	RW01-MWS/RW01-MWI
RWR-MWS/RWR-MWI	RWH-MWS/RWH-MWI	RW10-MWI	RW02-MWS/RW02-MWI
RWS-MWS/RWS-MWI	RWI-MWS/RWI-MWI	RW11-MWS/RW11-MWI	RW03R-MWS/RW03R-MWI
	RWO-MWS/RWO-MWI	RW12-MWS/RW12-MWI	RW04-MWS
	RWP-MWI	RW13-MWI	RW05-MWS/RW05R-MWI
	RWQ-MWS/RWQMWI	RW14-MWS	RW06R-MWS/RW06-MWI
		RW15-MWS/RW15-MWI	RW07-MWS/RW07-MWI
		RW16-MWS/RW16-MWI	RW08-MWS/RW08-MWI
		RW18-MWS/RW18-MWI	RW22R-MWS/RW22R-MWI
		RW23-MWS/RW23-MWI	RWA-MWS/RWA-MWI
		RW24-MWS/RW24-MWI	RWB-MWS/RWB-MWI
		RW25-MWS/RW25-MWI	RWD-MWS/RWD-MWI
		RWJ-MWS/RWJ-MWI	RWE-MWS/RWE-MWI
		RWK-MWS/RWK-MWI	RWF-MWS/RWF-MWI
		RWL-MWS/RWL-MWI	RWG-MWS/RWG-MWI
		RWM-MWS/RWM-MWI	
		RWN-MWS	

ARM submitted a Rod and Wire Mill Monitoring Network Update Letter dated March 8, 2021 (MNU Letter) to outline an updated groundwater sampling plan for the calendar year of 2021 and going forward. This plan consisted of collecting samples from some wells on a semiannual basis and others on an annual basis. The MNU Letter included tables showing the updated sampling frequency for the wells and the rationale for each. These tables are included as **Table 2** (shallow wells) and **Table 3** (intermediate wells). Samples collected for the first quarter sampling event (Q1) were collected from February 23 to March 28, 2022. Samples collected for the third quarter sampling event (Q3) were collected from September 9-28, 2022.

Well pair RW03R-MWS and RW03R-MWI were installed on May 3, 2022. These wells were installed as replacements for the original RW03 pair (RW03R-MWS and RW03-MWI). The original two wells were inadvertently buried during development and landscaping activities in 2021 and subsequently could not be located. Both new wells were installed about 14 feet south of the original wells, with similar screened intervals: the intermediate replacement well has the same screen interval as the original intermediate well (30-40' bgs), while the shallow replacement well has a screen interval of 12-20' bgs compared to 10-20' bgs for the original. Well construction logs are included in this report in **Appendix A**.

This IM Progress Report summarizes groundwater conditions following remediation trench installation, with focus on the results of the two semiannual sampling events carried out in 2022.

### 3.3. GROUNDWATER CONDITIONS IN 2022

#### 3.3.1. Shallow Groundwater Zone

##### 3.3.1.1 Groundwater Elevations

A synoptic round of groundwater level measurements was collected for the Q1 and Q3 sampling events. Based on the field measurements, groundwater potentiometric surface maps were constructed for the shallow zone for the Q1 and Q3 events and are included as **Figure 4** and **Figure 5**, respectively. As shown on the figures, the predominant flow direction for the shallow zone in the eastern portion of the Site is to the west. In the central and west portions of the Site groundwater flow is to the north and northwest. In the southwest portion of the Site (south of RW06R-MWS) flow is to the west and southwest. On both figures, RW23-MWS is seen to be a localized high point from which groundwater flow radially to the north, northwest, west, and southwest.

##### 3.3.1.2 Zinc

**Figure 6** displays the distribution of zinc concentrations in the shallow zone during the Q1 sampling event. The highest measured concentration was at RWN-MWS (548,000 µg/L), located upgradient of the western-most remediation trench and within the former Sludge Bin Storage Area. In addition, zinc was measured in high concentrations (compared to other shallow well concentrations during this event) east of the trenches near the southern edges of the Former East Pond at RWR-MWS (267,000 µg/L), RWS-MWS (97,500), and north of the remediation trenches in RW22R-MWS (113,000 µg/L).

**Figure 7** displays the distribution of zinc concentrations in the shallow zone during the Q3 sampling event. Relatively high concentrations were measured again at RWR-MWS (205,000 µg/L) and RW22R-MWS (197,000 µg/L). The zinc distribution is very similar to that of the Q1 event. For contour purposes, if a sample was not collected during the Q3 sampling event, then the concentration from the Q1 sampling event was used.

Time series graphs of zinc concentrations in shallow wells are shown in **Figures 8** through **13**. For all charts, the y-axes are shown on logarithmic scales. Results for the shallow wells are compared to the relevant surface water criterion for zinc of 81 µg/L. The charts include the four different well groups and are divided up based on installation date. Wells installed in 2017 or prior are termed “original wells”, and wells installed in 2019 are termed “supplemental wells”.

- **Figure 8:** shallow perimeter wells, original wells
- **Figure 9:** shallow perimeter wells, supplemental wells
- **Figure 10:** shallow interior wells, original wells
- **Figure 11:** shallow interior wells, supplemental wells
- **Figure 12:** shallow delineation wells, all wells
- **Figure 13:** shallow upgradient wells, all wells

Several items to note include:

- Significant fluctuations in zinc concentrations have historically been observed in RW02-MWS. From its installation in 2019 up through the November 2020 sampling event, the concentration of zinc in this well was most often measured between 1,000 and 30,000 µg/L. Then, the zinc concentration in this well went from 3.1 JB µg/L in the Q4 2021 event, to 36,300 µg/L in the Q1 2022 event, to 7,503 µg/L in the Q3 2022 event.
- The concentration of zinc in RW03R-MWS measured during the Q3 2022 event (102 µg/L) is much lower than the last zinc concentration measured in RW03-MWS before it was lost, (18,800 µg/L in the Q2 2020 event.)
- Concentrations of zinc in perimeter shallow wells were below the relevant surface water criterion of 81 µg/L in three of the ten perimeter shallow wells sampled in the Q3 2022 event: RWB-MWS, RWD-MWS, and RW05-MWS.

Refer to Section 3.4 for trend analysis. Results for zinc concentrations in shallow wells are shown in **Table 4**. Laboratory reports for samples collected during 2022 are included as **Appendix B**. Individual time-series graphs for each shallow zone monitoring well are presented in **Appendix C**.

### 3.3.1.3 Cadmium

**Figure 14** displays a map of the distribution of cadmium concentrations in the shallow zone during the Q1 2022 sampling event. Well RWN-MWS, located within the Former Sludge Bin Storage Area, had the highest detected concentration of cadmium at 2,260 µg/L. Well RWI-MWS, located within the Former Northwest Pond, also had a relatively high cadmium concentration of 1,010 µg/L. All cadmium concentrations in shoreline wells that were sampled were non-detect except for RW22R-MWS (29.4 µg/L), RW07-MWS (16.6 µg/L), and RWF-MWS (4.9 µg/L). The

ambient surface water criterion for cadmium is 7.9 µg/L. All other measured cadmium concentrations at shallow zone wells were below 30 µg/L.

**Figure 15** displays the distribution of cadmium concentrations in the shallow zone during the Q3 2022 sampling event. For contour purposes, if a sample was not collected during the Q3 sampling event, then the concentration from the Q1 sampling event was utilized. During the Q3 sampling event, RW22R-MWS had the highest detected concentration of cadmium (56.9 µg/L) (RWN-MWS and RWI-MWS are sampled annually in Q1 only). All cadmium concentrations along the shoreline in the intermediate zone were below 5 µg/L.

Time series graphs of cadmium concentrations in shallow wells are shown in **Figures 16** through **21**. For all charts, the y-axes are shown on logarithmic scales. Results for the shallow wells are compared to the relevant surface water criterion for cadmium of 7.9 µg/L. The charts include the four different well groups, and are divided up based on installation date. Wells installed in 2017 or prior are termed “original wells”, and wells installed in 2019 are termed “supplemental wells”.

- **Figure 16:** shallow perimeter wells, original wells
- **Figure 17:** shallow perimeter wells, supplemental wells
- **Figure 18:** shallow interior wells, original wells
- **Figure 19:** shallow interior wells, supplemental wells
- **Figure 20:** shallow delineation wells, all wells
- **Figure 21:** shallow upgradient wells, all wells

Several items to note include:

- Concentrations of cadmium in perimeter shallow wells were below the relevant surface water criterion of 7.9 µg/L in all perimeter shallow wells sampled in the Q3 2022 event.
- Sampling results for interior shallow zone wells show that total cadmium was generally below 5 µg/L during 2022, except for in well RWN-MWS. This well is located within the former Sludge Bin Storage Area and had a cadmium concentration that was three orders of magnitude greater than concentrations of most of the shallow zone wells.
- Cadmium was detected in upgradient shallow zone well RWS-MWS at very low levels (less than 3 µg/L).

Refer to Section 3.4 for trend analysis. Cadmium concentrations in shallow wells are shown in **Table 5**. Laboratory reports for samples collected during 2022 are included as **Appendix B**. Individual time-series graphs for each shallow zone monitoring well are presented in **Appendix C**.

#### 3.3.1.4 *pH*

Measurements of pH in the shallow groundwater zone from the Q1 2022 sampling event, shown on **Figure 22**, ranged from 4.20 to 10.62. Wells RWJ-MWS, RW06R-MWS and RW16-MWS had relatively high pH values (9.83, 10.1, and 10.62, respectively).

Measurements of pH in the shallow groundwater zone from the Q3 2022 sampling event, shown on **Figure 23**, generally ranged from 4 to 11, with a few pH values outside this range that may be anomalous. All 2022 shallow zone field parameter data, including pH, are summarized in **Table 6**.

### 3.3.2. Intermediate Groundwater Zone

#### 3.3.2.1 *Groundwater Elevations*

A synoptic round of groundwater level measurements was collected for each of the Q1 and Q3 2022 sampling events. Based on these field measurements, groundwater elevation contour maps were constructed for the intermediate zone for the two semiannual events (included as **Figure 24** and **Figure 25**, respectively). The groundwater elevations reveal that the potentiometric surface in the intermediate zone was nearly flat during both 2022 events, with very little variation (generally less than a foot of difference) amongst most calculated groundwater elevations across the Site. Well RWR-MWI had a notably higher groundwater elevation in the Q1 event (3.16 feet amsl) compared to its Q3 elevation (1.30 feet amsl). Otherwise, groundwater elevations were generally higher during the Q3 event than the Q1 event. It should be noted that there was a fairly significant precipitation event (1.38 inches) on the day prior to the Fall 2022 groundwater gauging. Anomalous elevations were measured for the Q3 event for wells RW10-MWI (3.00 feet amsl) and RW19-MWI (-2.83 feet amsl) so these values were not included for the generation of the contours on **Figure 25**.

Groundwater elevations in the intermediate zone are generally lower than in the shallow zone, indicating a downward vertical gradient. There are three exceptions (RW22R, RWE and RWG pairs) where a higher groundwater elevation was observed in the intermediate well than in the shallow well, indicating a potential upward vertical gradient at these locations. The upward vertical gradient has been observed in this area in several sampling events prior to 2022.

#### 3.3.2.2 *Zinc*

Intermediate groundwater zinc concentrations during the Q1 2022 event are shown on **Figure 26**. Zinc concentrations were highest within and outside the north edge of the former East Pond source area, at RW19-MWI (3,090,000 µg/L) and RWP-MWI (2,530,000 µg/L), respectively. A high zinc concentration was also observed at RW21-MWI (5,070,000 µg/L). Zinc concentrations above 500,000 µg/L were also observed at locations RWR-MWI and RWS-MWI. **Figure 26** shows that



the contaminant plume in the intermediate zone extends beyond the northern limits of the treatment trenches and that the former Northwest Pond area may have acted as a source of contaminant mass to the intermediate zone groundwater. This impacted area was discussed in the Comment Response Letter: Rod and Wire Mill IM 2020 Progress Report and Parcel A3 NAPL Semi-Annual Monitoring Report (ARM 2022); it was identified in previous sampling and delineation events but was unable to be completely excavated due to the presence of overhead electric lines.

The concentration observed in RWA-MWI was also elevated compared to other shoreline intermediate wells during this event. Based on the lower concentration in RW22R-MWI, the relatively high zinc concentration in RWA-MWI appears to be isolated from the high concentrations observed around the former Northwest Pond area. At RWJ-MWI, the zinc concentration is low (6,330 µg/L) relative to other intermediate wells nearby. However, concentrations of zinc above 60,000 µg/L extend westward from RWL-MWI toward RWE-MWI, and also to the south from RWL-MWI to RW23-MWI.

Intermediate zone groundwater zinc concentrations during the Q3 2022 event are shown on **Figure 27**. For contour purposes, if a sample was not collected during the Q3 sampling event, then the concentration from the Q1 sampling event was used. High concentrations at well RWP-MWI and RWR-MWI were still present during the Q3 event. The isolated plume in the northwest corner near RWA-MWI persists, as well as the two axes of high concentrations (~60,000-100,000 µg/L) extending from RWL-MWI westward to RWE-MWI and from RWL-MWI southward to RW23-MWI). The concentration in RW06-MWI was significantly higher during the Q3 event (97,570 µg/L) than the Q1 event (anomalously not detected).

Time series graphs of zinc concentrations in intermediate wells are shown in **Figures 28** through **33**. For all charts, the y-axes are shown on logarithmic scales. Results for the intermediate wells are compared to the relevant surface water criterion for zinc of 81 µg/L. The charts include the four different well groups and are divided up based on installation date. Wells installed in 2017 or prior are termed “original wells”, and wells installed in 2019 are termed “supplemental wells”.

- **Figure 28:** intermediate perimeter wells, original wells
- **Figure 29:** intermediate perimeter wells, supplemental wells
- **Figure 30:** intermediate interior wells, original wells
- **Figure 31:** intermediate interior wells, supplemental wells
- **Figure 32:** intermediate delineation wells, all wells
- **Figure 33:** intermediate upgradient wells, all wells

Several items to note include:

- The concentration of zinc in well RW03R-MWI during the Q3 event (3,063 µg/L) was much lower than the last measured concentration of zinc in RW03-MWI before it was lost (19,400 µg/L).

- There were two locations—RWB-MWI (19 µg/L, Q3) and RW08-MWI (not detected, Q1)—with zinc concentrations in the intermediate perimeter wells below the surface water criterion of 81 µg/L during either of the 2022 events. The highest zinc concentration amongst perimeter wells in 2022 was consistently measured in well RWA-MWI (415,000 µg/L in the Q1 event and 340,500 µg/L in the Q3 event).
- The zinc concentration in upgradient intermediate zone well RW19-MWI exhibited a significant increase from the previous Q2 2021 sampling event to the Q1 2022 sampling event; however, the result from the Q2 2021 sampling event was anonymously low, and the result from the Q1 2022 sampling event was within the historic range.

Refer to Section 3.4 for trend analysis. All intermediate well zinc results are included in **Table 7**. Laboratory reports for samples collected during 2022 are included as **Appendix B**. Individual time-series graphs for each intermediate zone monitoring well are presented in **Appendix D**.

### 3.3.2.3 Cadmium

Intermediate zone cadmium concentrations during the Q1 event, shown on **Figure 34**, vary significantly across the Site. The highest cadmium concentration was measured in RW13-MWI (23,700 µg/L) located in the former Sludge Bin Storage Area. There were also relatively high concentrations compared to other intermediate well concentrations during this event north of the easternmost trench near the former East Pond in well RWP-MWI (5,340 µg/L) and north of the westernmost trench near the former Northwest Pond in wells RWI-MWI (5,230 µg/L) and RWH-MWI (5,150 µg/L). As with zinc, the high cadmium detection at the northwestern-most corner of the Site at RWA-MWI (9,840 µg/L) appears to be isolated from the known source areas.

Intermediate zone cadmium concentrations during the Q3 event, shown on **Figure 35**, are similar to those observed during the Q1 event. Relatively high concentrations persisted in northern wells RWH-MWI and RWP-MWI, as well as at the isolated concentrations detected in the northwest corner at RWA-MWI. Cadmium concentrations in the intermediate perimeter wells during the Q3 event were below the relevant surface water criterion of 7.9 µg/L in RWB-MWI, RW22R-MWI, and RW05R-MWI.

Time series graphs of zinc concentrations in intermediate wells are shown in **Figures 36** through **41**. For all charts, the y-axes are shown on logarithmic scales. Results for the intermediate wells are compared to the surface water criterion for cadmium of 7.9 µg/L. The charts include the four different well groups and are divided up based on installation date. Wells installed in 2017 or prior are termed “original wells”, and wells installed in 2019 are termed “supplemental wells”.

- **Figure 36**: intermediate perimeter wells, original wells
- **Figure 37**: intermediate perimeter wells, supplemental wells
- **Figure 38**: intermediate interior wells, original wells
- **Figure 39**: intermediate interior wells, supplemental wells

- **Figure 40:** intermediate delineation wells, all wells
- **Figure 41:** intermediate upgradient wells, all wells

Several items to note include:

- The highest cadmium concentration in perimeter wells in 2022 was consistently measured in well RWA-MWI (9,840 µg/L in the Q1 event and 8,587 µg/L in the Q3 event).
- As with zinc, the concentration of cadmium measured in well RW03R-MWI during the Q3 2022 event (9.6 µg/L) was much lower than the last cadmium concentration measured in the well it replaced RW03-MWI before it was lost (581 µg/L).

Refer to Section 3.4 for trend analysis. Cadmium results for all samples from the intermediate zone are included in **Table 8**. Laboratory reports for samples collected during 2022 are included as **Appendix B**. Individual time-series graphs for each intermediate zone monitoring well are presented in **Appendix D**.

#### 3.3.2.4 pH

For both the Q1 and Q3 event, pH values in the intermediate groundwater zone generally ranged from 3.5 to 7.5. All 2022 intermediate zone field parameter data, including pH, are summarized in **Table 9**. Measurements of pH within the intermediate groundwater zone during the Q1 and Q3 events are shown on **Figure 42** and **Figure 43**, respectively. The highest pH value (7.79) during the Q1 event was measured at well RW16-MWI, while the highest value during the Q3 event was measured at well RWJ-MWI (7.47). There were five intermediate zone monitoring wells with pH values less than 4.0 (RWD-MWI, RWG-MWI, RW08-MWI, RW12-MWI and RW21-MWI). Previous years also had a few wells with pH values below 4.0. Across the whole site, pH is generally lower in the intermediate zone than in the shallow zone. However, during both the Q1 and Q3 events, the pH in the intermediate wells in the RWK and RWL well pairs was higher than it was in the corresponding shallow wells. This is discussed further in the paragraph below.

#### 3.3.3. Focused Well Pairs J-K-L

**Figure 26** and **Figure 27** show the locations of the Focused wells (well pairs J-K-L) relative to the trench, along with the intermediate zinc concentrations for the Q1 and Q3 2022 sampling events, respectively. These Focused wells were installed in 2019, more than two years following the trench installation. As indicated on **Figure 26**, intermediate groundwater upgradient of the westernmost trench in well RW13-MWI contains over 400,000 µg/L of dissolved zinc. The zinc concentration in RWJ-MWI, directly adjacent and downgradient of the trench, was detected at 6,330 µg/L in the Q1 sampling event and 1,325 µg/L in the Q3 sampling event. As the distance downgradient from the trench increased, the zinc concentration was observed to increase such that the zinc concentration ranged from 16,940 µg/L to 19,600 µg/L in RWK-MWI (~10 feet downgradient of RWJ-MWI) and from 75,200 µg/L to 79,440 µg/L in RWL-MWI (~20 feet

downgradient from RWJ-MWI). The same pattern appears in these Focused wells in intermediate zone for cadmium concentrations. The concentrations for RWK-MWI and RWL-MWI in 2022 for zinc only (cadmium levels were similar to previous years) were the lowest observed in these wells.

There is also a corresponding gradient in pH in these focused wells. Measured pH values exhibit decreasing gradient moving away from the trench in the intermediate zone. In both the Q1 and Q3 events, RWJ-MWI has the highest pH (6.84 and 7.47) while RWL-MWI has the lowest pH (5.77 and 6.24), with RWK-MWI having a pH between the two (6.37 and 6.60). These patterns in zinc concentrations, cadmium concentrations, and pH measurements in the intermediate zone suggests that the permeable reactive barrier treatment technology and the reagent appears to be effective in raising the pH of the groundwater and removing the metals concentrations.

Furthermore, during both the Q1 and Q3 events, the pH was higher in intermediate well RWK-MWI than in its paired shallow well RWK-MWS, and the pH was higher in intermediate well RWL-MWI than in its paired shallow well RWL-MWS. This suggests that treated groundwater from the trench may be starting to reach the RWK-MWI and RWL-MWI wells. Time-series graphs of pH measurements for the Focused shallow wells and the Focused intermediate wells are shown on **Figure 44** and **Figure 45**, respectively.

Time series graphs for the focused well pairs are shown in **Figures 46** through **48**. For all charts, the y-axes are shown on logarithmic scales. Results for the intermediate wells are compared to the surface water criterion for cadmium of 7.9 µg/L. The charts include the four different well groups and are divided up based on installation date. Wells installed in 2017 or prior are termed “original wells”, and wells installed in 2019 are termed “supplemental wells”.

- **Figure 46:** shallow zone, zinc
- **Figure 47:** intermediate zone, zinc
- **Figure 48:** intermediate zone, cadmium

Cadmium is rarely detected or is detected below the reporting limit in the shallow Focused wells, therefore no time-series graph was made for cadmium concentrations in the shallow wells. Several items to note include:

- Concentrations upgradient from the trench (RW13-MWI and RW12-MWI concentrations) suggest that the zinc concentration at RWJ-MWI has significantly decreased from what it would have been in that area without installation of the trenches.
- For both the shallow and intermediate wells, the zinc concentrations in the RWJ well pair (the closest wells to the trench) are significantly lower than the zinc concentrations in the RWK and RWL well pairs. Refer to **Figure 46** and **Figure 47**.
- For the intermediate wells, the cadmium concentrations in the RWJ well pair (the closest wells to the trench) are lower than the zinc concentrations in the RWK and RWL well pairs.

In addition, the cadmium concentrations in the RWJ and RWK well pairs are significantly lower than the cadmium concentrations in the RWL well pair (the furthest from the trench). Refer to **Figure 48**.

The groundwater elevations of the Focused well pairs provide evidence that groundwater may be draining through the trenches from the shallow zone to the intermediate zone. In both semiannual sampling events 2022, there is a groundwater elevation gradient toward the trench (from L toward J) in these three wells in the shallow zone. This gradient is depicted by the groundwater elevations shown on **Figure 4** and **Figure 5**. Although the differences in groundwater elevations between the three wells are usually within a tenth of a foot, there is almost a two-foot difference between RWL-MWS (3.67 feet amsl) and RWK-MWS (1.85 feet amsl) in the Q1 event. During the Q3 2022 event, there is a slight groundwater elevation gradient away from the trench (from J toward L) in the intermediate zone. This gradient is depicted by the groundwater elevations shown on Figure 25. The difference in groundwater elevations between the three intermediate zone Focused wells is a few tenths of a foot. A groundwater elevation gradient away from the trench in the intermediate zone was not observed during the Q1 event due to some anomalous groundwater elevations in these wells. Although the groundwater elevations in the Focused wells do not depict a gradient away from the trench (from J to L) in the intermediate zone during the Q1 event, it did show a gradient away from the trench during the Q3 event, and has also been observed during most previous years' monitoring events.

### 3.4. STATISTICAL EVALUATION – TREND ANALYSIS

For the purpose of evaluating the distribution of parameter concentrations over time, parameters were subjected to a trend analysis. Trend analysis was performed for cadmium and zinc for all wells using the Mann-Kendall test.

The Mann-Kendall test is a non-parametric test for identifying linear trends in data. The test is suitable for non-normally distributed data and is not limited by sample size. The test pairs measurements and assigns a score to each possible pair based on comparing the average of the pair in question to the average of a pair of earlier measurements. If the average of a particular pair of measurements is lower than the average of an earlier pair it is assigned a score of -1, if it is tied it is assigned a score of 0, and if it is higher it is assigned a score of 1. The sum of these scores is computed to obtain the Mann-Kendall Statistic (S). If S is positive it implies an upward trend over time, if it is negative it implies a downward trend over time, an S value near zero roughly indicates that there is no apparent trend in data. As the absolute value of S gets larger, the stronger the evidence for a real increasing or decreasing trend. For larger data sets (greater than 10), the behavior of S tends to approximate a normal distribution in accordance to the central limit theorem, and a standardized statistic, Z, is used for trend identification. For higher levels of significance, the larger the absolute value of Z or S needs to be to conclude the presence of a trend in data over time. A significance level of 95 percent was used for all Mann-Kendall Tests performed for this

evaluation. Data points that were below the detection limits were replaced with the laboratory reporting limit divided by two. No wells were excluded as a result of having too few samples. The results of the trend tests were reviewed to remove any trends that were the result of changing detection limits over time. Statistical analyses were performed using the ChemStat® statistical analysis software (version 6.3.0.2, Starpoint Software, Inc., ©1996-2013). A trend was identified as statistically significant if the Mann-Kendall Test identified it as increasing or decreasing at a 95% confidence factor. The ChemStat® input and output files are included as an Electronic Attachment.

Statistically significant trends for cadmium and zinc are summarized **Table 10**. If no statistically significant trend was identified for a parameter, it is not shown in **Table 10**. Historical sampling dates included in the statistical trend analysis covered events from well installation (2017 to 2019) to present. The results of all trend tests are included in **Appendix E**, and are summarized below.

#### Upgradient wells:

- Downward trend for cadmium in RWR-MWS and RW19-MWI
- Downward trend for zinc in RWR-MWI
- Upward trend for cadmium in RWS-MWI

#### Delineation wells:

- Downward trend for cadmium in RWO-MWS and RWO-MWI
- Downward trend for zinc in RWQ-MWI
- Upward trend for cadmium in RWH-MWI

#### Interior wells:

- Downward trend for cadmium in RW12-MWS, RW16-MWS, RW18-MWS, RWN-MWS, RW10-MWI, RW11-MWI, RW16-MWI, RW18-MWI, and RW24-MWI
- Downward trend for zinc in RWM-MWI
- Upward trends for zinc at RW11-MWS and RW09-MWI
- Upward trend for cadmium at RW25-MWI

#### Focused (J-K-L) wells:

- Downward trend for cadmium in RWJ-MWS, RWK-MWS, and RWL-MWS
- Downward trend for zinc in RWL-MWI

Perimeter wells:

- Downward trend for cadmium in RW01-MWS, RW02-MWS, RW05-MWS, RWB-MWS, RWF-MWS, RW05R-MWI, RWB-MWI, and RWE-MWI
- Downward trend for zinc in RW08-MWI
- Upward trends for zinc at RWG-MWI
- Upward trend for cadmium at RW07-MWS, RW01-MWI, RW06-MWI, RW07-MWI, RW22R-MWI, and RWF-MWI

For the Focused J-K-L wells, several downward trends were identified, and no upward trends were identified. For the other interior wells, nine wells had downward trends for cadmium and one well had a downward trend for zinc, compared with only two wells with upward trends for cadmium and one well with an upward trend for zinc. This indicates that for the wells within the remediation trench area, the majority of wells have either stable or downward trends for both cadmium and zinc.

### 3.5. CONTAMINANT REDUCTION

The interim groundwater treatment goals are to increase the pH in the intermediate groundwater zone in order to precipitate the dissolved metals and achieve a reduction in dissolved concentrations of cadmium and zinc within the source areas.

The time-series graphs show that the cadmium and zinc concentrations have, in some cases, fluctuated by orders of magnitude between consecutive sampling events. As a result, the comparison of individual quarterly values for some wells can indicate an increase or decrease depending on which specific quarterly values are compared. For ease in visualizing overall trends and magnitude of reductions, annual average concentrations of cadmium and zinc were calculated for each well for which multiple years of data are available. Values for total and dissolved metals were used interchangeably in the calculations based on previous observations that nearly all of the total metals concentrations are accounted for by the dissolved fraction.

**Table 11** summarizes average annual groundwater cadmium and zinc concentrations at each shallow zone well installed before the remediation trenches. The table shows that the average cadmium concentrations in shallow zone wells that were sampled in 2022 are all below the ambient surface water quality criterion of 7.9 ug/L, except for RW07-MWS. All other shallow well cadmium concentrations have shown decreases over the observed time period.

Zinc concentrations in the easternmost interior shallow zone wells that were sampled in 2022 (RW16-MWS and RW18-MWS) showed reductions of 69% and 97%, respectively, over the observed time periods. However, zinc concentrations increased from 2015 to 2022 at the more western interior well RW12-MWS. The largest percent increases were observed at interior well RW12-MWS (556%) and perimeter well RW02-MWS (562%). Zinc concentrations in perimeter

wells RW01-MWS and RW05-MWS decreased by 24% and 90%, respectively, since they were installed. The only other well that was sampled in 2022 in which 2022 zinc concentrations showed an increase relative to its earliest yearly average was RW07-MWS (209%).

**Table 12** summarizes average annual groundwater cadmium and zinc concentrations at each intermediate zone well installed before the remediation trenches. For cadmium concentrations, the 2022 yearly average for upgradient well RW19-MWI showed a 95% reduction from its 2017 yearly average. Interior wells that were sampled in 2022 showed decreases from the earliest yearly average to the 2022 yearly average except for well RW15-MWI. The most significant cadmium concentration decreases were observed at RW09-MWI, RW10-MWI, RW11-MWI, and RW12-MWI, with values decreasing by over 80%. Intermediate zone yearly average cadmium concentrations have increased in perimeter wells RW01-MWI, RW06-MWI and RW07-MWI. The most notable increases were at wells RW06-MWI and RW07-MWI, where average yearly cadmium concentrations increased by 1,679% and 2,573%, respectively, from their earliest yearly average to their 2022 yearly average. Decreases in cadmium concentrations were observed in RW02-MWI and RW03-MWI from their earliest yearly averages to their 2022 yearly averages.

For zinc concentrations, 2022 yearly average in intermediate zone upgradient well RW19-MWI decreased by 34% compared to the 2017 yearly average. Most interior wells showed significant decreases in zinc concentrations from the earliest yearly average to the 2022 yearly average. Only interior wells RW09-MWI and RW15-MWI exhibited increases from their earliest yearly average zinc concentrations to their 2022 average zinc concentrations. Patterns in zinc concentrations for intermediate zone perimeter wells corresponded to those for cadmium in intermediate zone perimeter wells, where RW01-MWI, RW06-MWI and RW07-MWI showed increases from their earliest yearly averages to their 2022 yearly averages.



## 4.0 SUMMARY AND CONCLUSIONS

The current approach for addressing the source area elevated dissolved cadmium and zinc in the intermediate groundwater zone is to precipitate the dissolved metals in-situ by raising the groundwater pH above 7. This approach relies on groundwater movement to intercept the migration of metals contaminants in the intermediate zone upgradient of the trenches. Therefore, the effectiveness of the interim measure is expected to be observed first in the intermediate zone wells closest to the trenches and, due to the relatively slow groundwater velocity (less than 5 ft/year), may not be apparent in downgradient wells for several years after trench installation (January 2017).

The three Focused well pairs wells J - K - L were installed directly adjacent to the western most treatment trench to help evaluate overall trench performance. RWJ-MWI located closest to the trench exhibited elevated pH values and, most notably, significantly lower zinc concentrations when compared to the upgradient groundwater concentrations relative to the trench. Furthermore, it is notable that the pH was higher in intermediate wells RWK-MWI and RWL-MWI than in their paired shallow wells RWK-MWS and RWL-MWS. This suggests that treated groundwater from the trench may be starting to reach the RWK-MWI and RWL-MWI wells.

It is still early in the generation and evaluation of the groundwater monitoring data, especially due to the relatively flat groundwater gradient in the intermediate zone (as shown on **Figures 24 and 25**). Flow through the trenches is what effects the treatment of the groundwater, and the flow of ground water is slow due to the flat hydraulic gradient. However, the trend analysis completed identified several downward trends in the Focused J-K-L wells, and no upward trends. For the other interior wells, nine wells had downward trends for cadmium and one well had a downward trend for zinc, compared with only two wells with upward trends for cadmium and one well with an upward trend for zinc. This indicates that for the wells within the remediation trench area, the majority of wells have either stable or downward trends for both cadmium and zinc. Groundwater monitoring data and the overall trend will continue to be monitored and evaluated to assess the effectiveness of the treatment trenches in precipitating the dissolved metals from the groundwater.

In the shallow wells along the western shoreline (perimeter wells), cadmium concentrations in nearly all wells are below the ambient surface water quality criterion. However, less than half of zinc concentrations in these wells are below the ambient surface water quality criterion.

**Table 12** shows that concentration reductions have been achieved in the majority of interior intermediate wells since installation of the trenches.

Some wells at the Site are continuing to observe fluctuations in cadmium and zinc concentrations (several orders of magnitude) between consecutive events. It has been noted that the wells that

have exhibited these fluctuations are mostly wells installed prior to 2019. As such, these older wells exhibiting fluctuations will be inspected and/or have the structural integrity evaluated in order to determine if they are still providing groundwater samples that accurately reflect the groundwater geochemistry at the Site and are not being influenced by surface runoff leaking into the well or other similar structural failures.

The RWM IM Supplemental Investigation Report (ARM 2020a) identified some areas that may be outside the intended effective zone of the remediation trenches. The long-term effectiveness of the interim measure and the need for additional or alternative remedial measures will be evaluated further as described in the Rod and Wire Mill Groundwater Corrective Measures Study (CMS) Work Plan (Revision 1, dated January 14, 2021). The forthcoming Rod and Wire Mill Groundwater CMS Report will also evaluate the existing monitoring well network for both the shallow and intermediate groundwater zones.

Groundwater sampling at the RWM for dissolved cadmium and zinc will continue in 2023 in accordance with the schedule as presented in the RWM Monitoring Network Update letter (ARM 2021c).

## 5.0 REFERENCES

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## **FIGURES**

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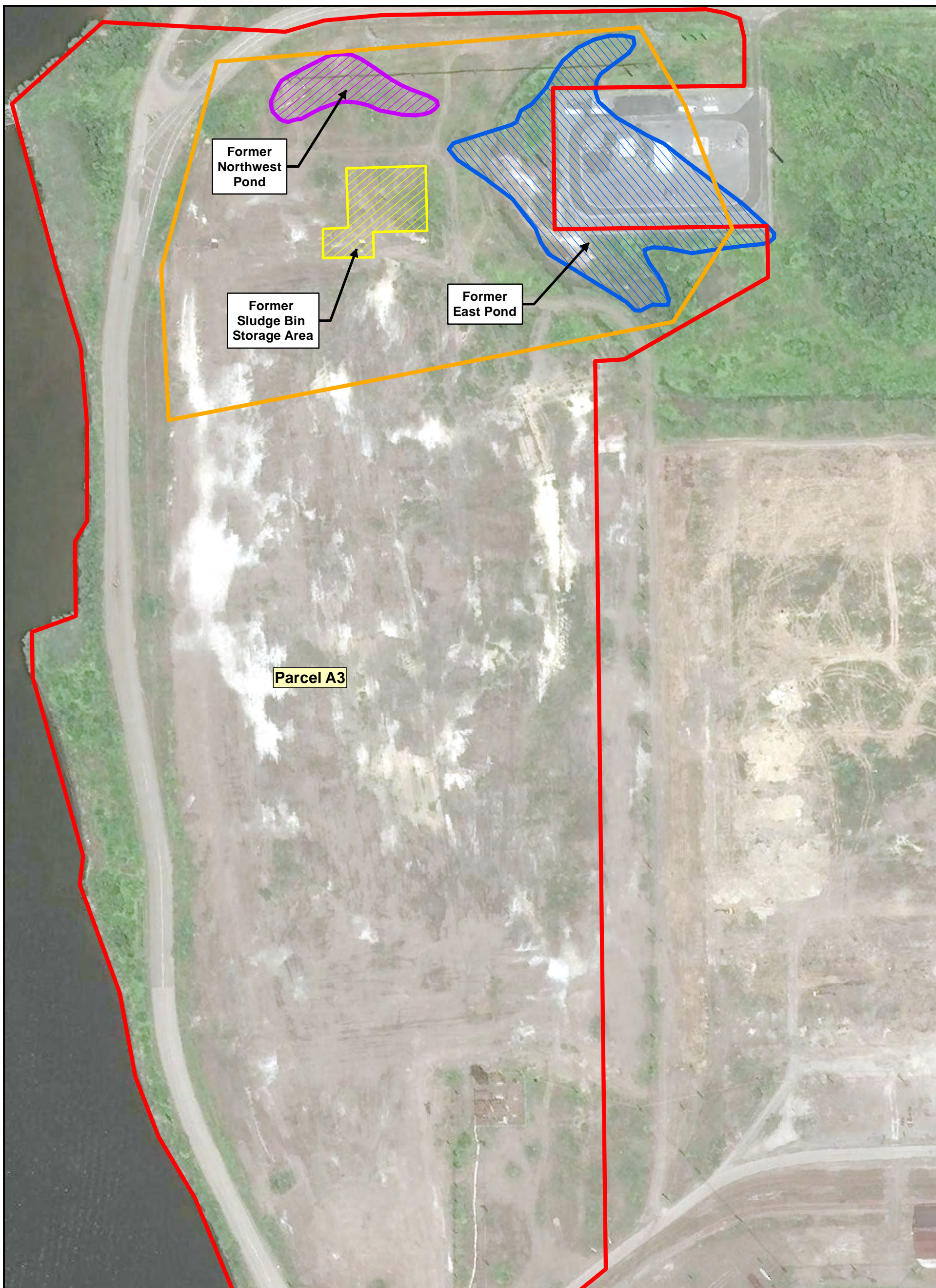
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Property Boundary  
 Rod & Wire Mill (RWM)

**RWM**

<p>Trade Point Atlantic          Sparrows Point Location Map          March 30, 2021</p>		<p><b>Figure</b> <b>1</b></p>
	<p><b>ARM Group LLC</b> Engineers and Scientists</p>	Tradepoint Atlantic
	Sparrows Point	
	Baltimore County, MD	
	ARM Project 21010103	







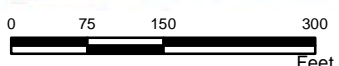


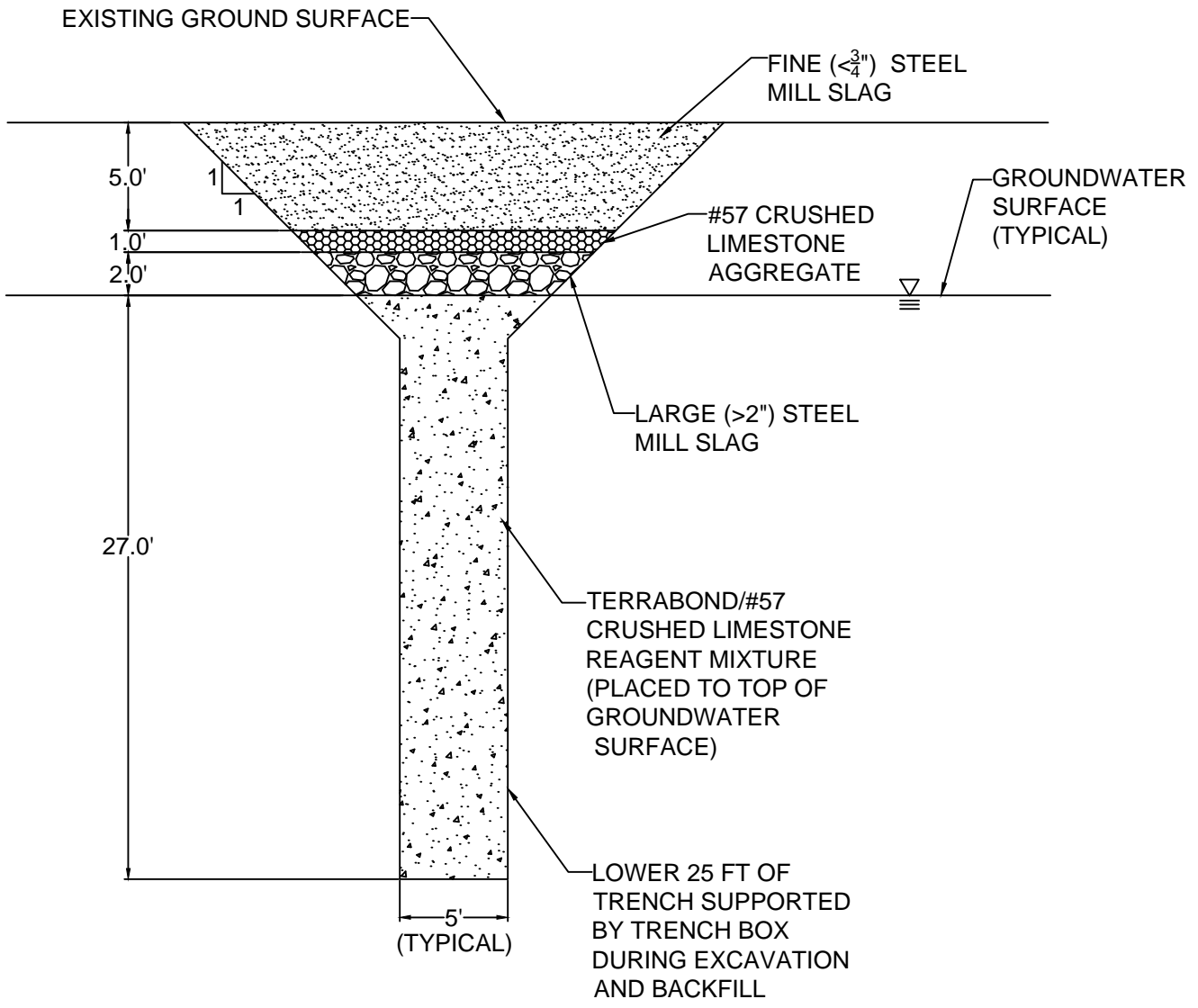
Former Northwest Pond

Former Sludge Bin Storage Area

Former East Pond

Parcel A3

<b>Parcel A3 (Rod &amp; Wire Mill)</b> <b>Location of Historical Activities</b> January 13, 2020		<b>Figure</b> <b>2</b>
Tradepoint Atlantic	Sparrows Point	
ARM Project 21010103	Baltimore County, MD	
 <b>ARM Group LLC</b> Engineers and Scientists	<ul style="list-style-type: none"> <li> Former Northwest Pond</li> <li> Former East Pond</li> <li> Former Sludge Bin Storage Area</li> <li> Approximate Boundary of Remedial Design Area</li> <li> Parcel A3 (RWM) boundary</li> </ul>	
 0 75 150 300 Feet		



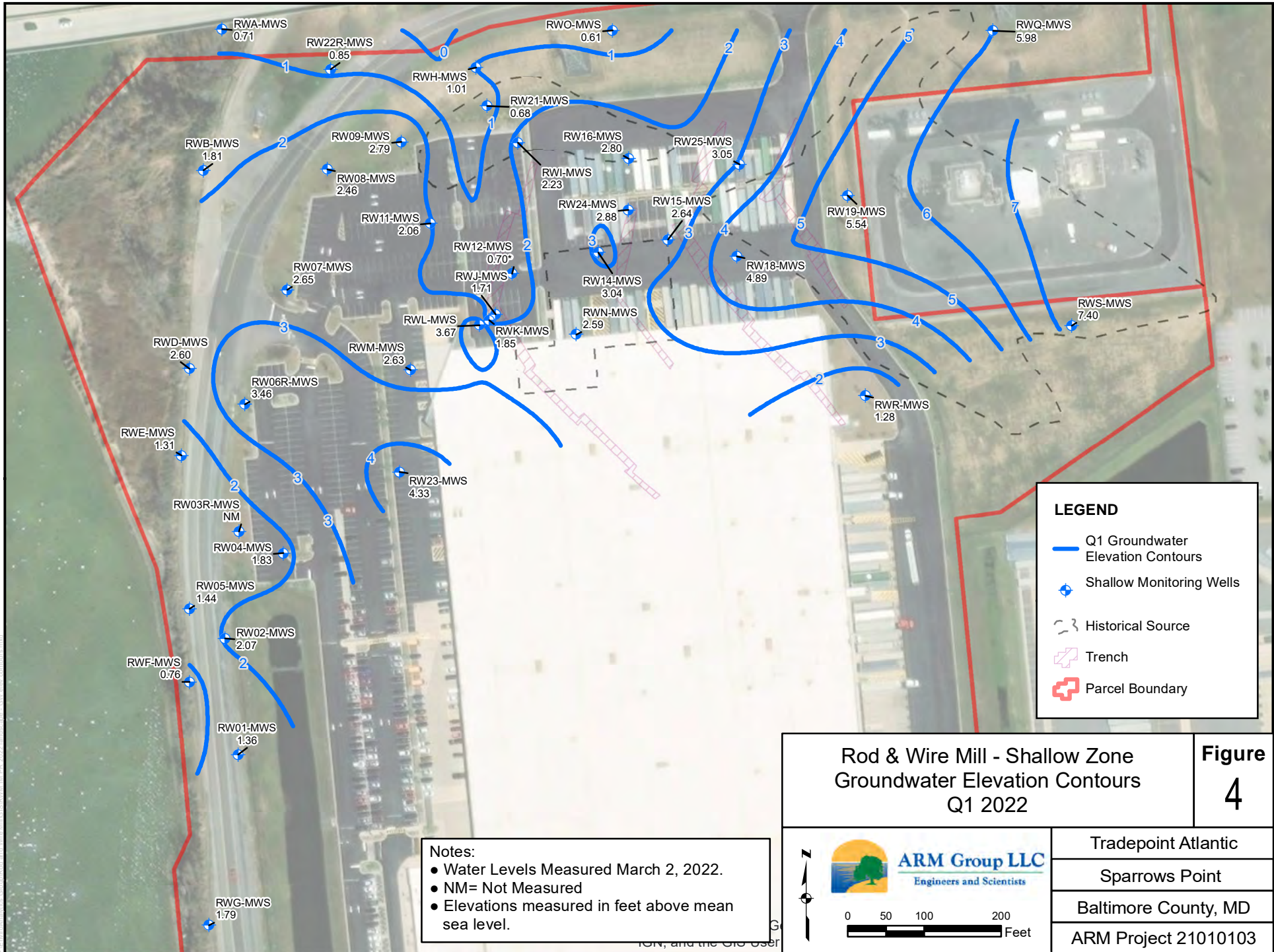
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INTERIM REMEDIAL MEASURES  
 FORMER ROD AND WIRE MILL AREA  
 SPARROWS POINT, MD

TYPICAL TREATMENT TRENCH BACKFILL PROFILE SECTION VIEW

PROJECT ENGINEER:	JSD	SCALE:	1" = 8'
CHECKED BY:		PROJECT NUMBER:	2016-3421
DRAWN BY:	EEE	DATE:	3/23/2017
		FIGURE:	3



Rod & Wire Mill - Shallow Zone  
Groundwater Elevation Contours  
Q1 2022

Figure  
4

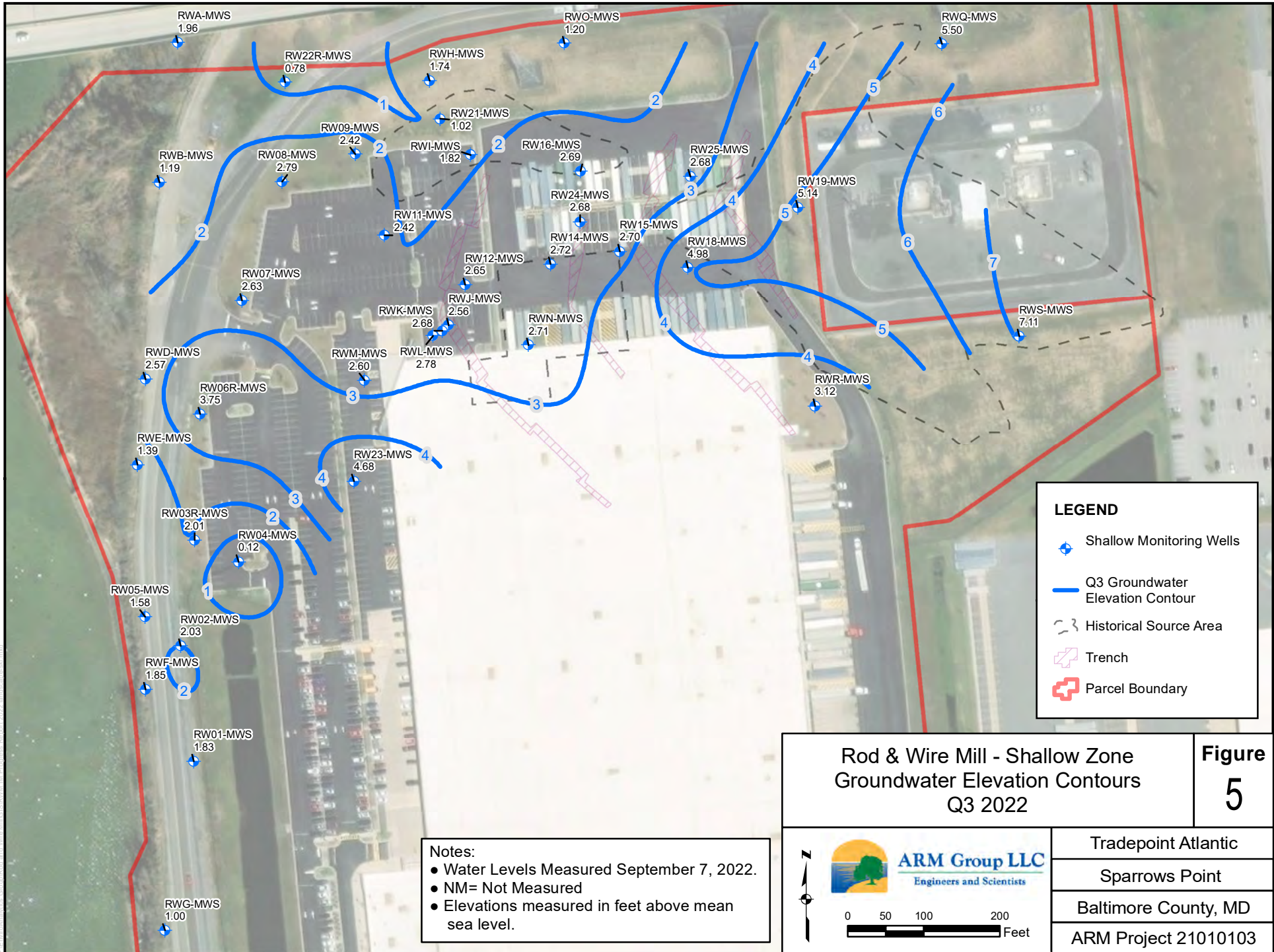
**Notes:**

- Water Levels Measured March 2, 2022.
- NM= Not Measured
- Elevations measured in feet above mean sea level.

ARM Group LLC  
Engineers and Scientists

Tradepoint Atlantic  
Sparrows Point  
Baltimore County, MD  
ARM Project 21010103





RWA-MWS 1.96  
RW22R-MWS 0.78  
RWB-MWS 1.19  
RW08-MWS 2.79  
RW07-MWS 2.63  
RWD-MWS 2.57  
RW06R-MWS 3.75  
RWE-MWS 1.39  
RW03R-MWS 2.01  
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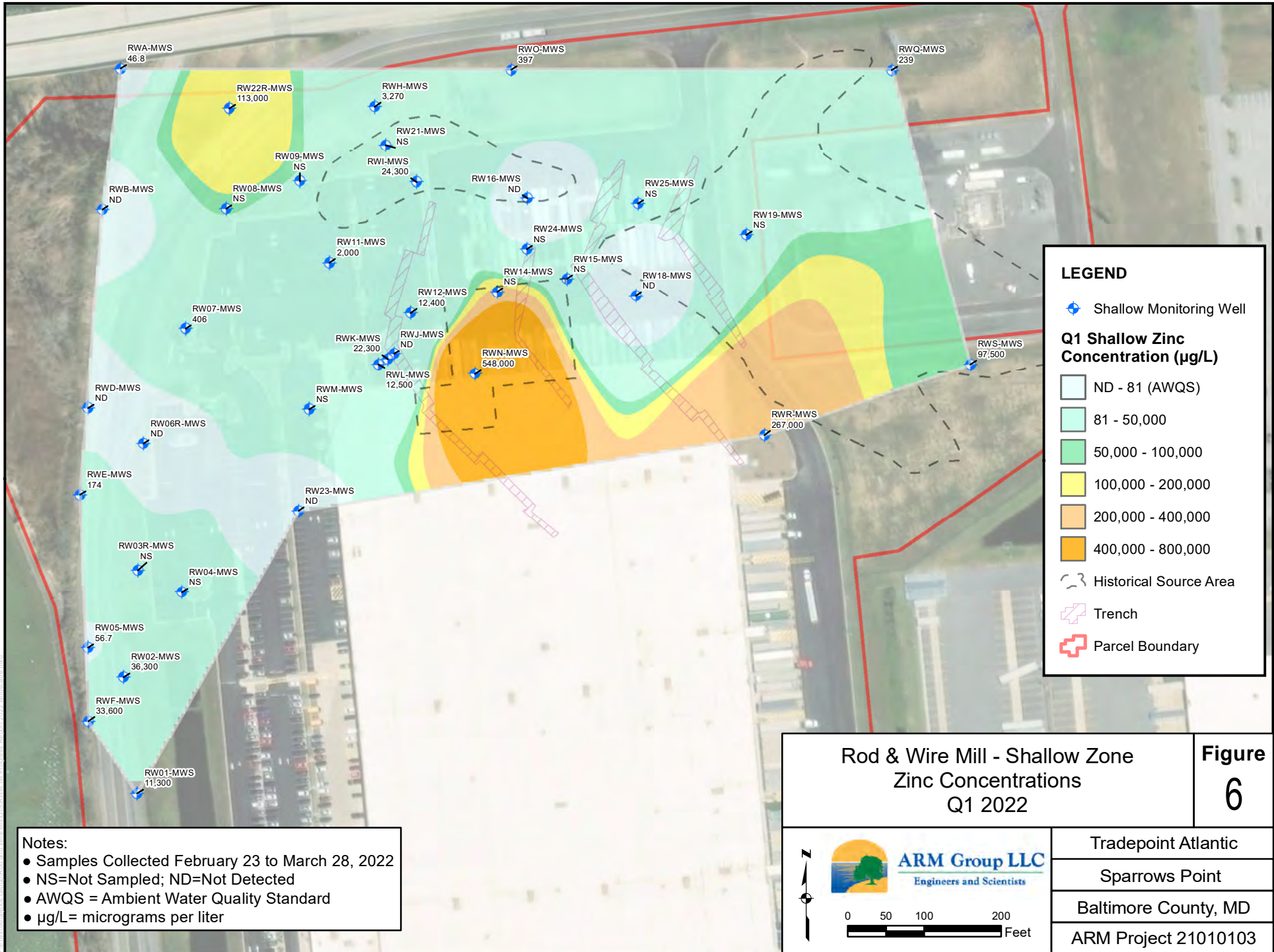
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RW09-MWS 2.42  
RW11-MWS 2.42  
RW12-MWS 2.65  
RWK-MWS 2.68  
RWM-MWS 2.60  
RWL-MWS 2.78  
RW23-MWS 4.68

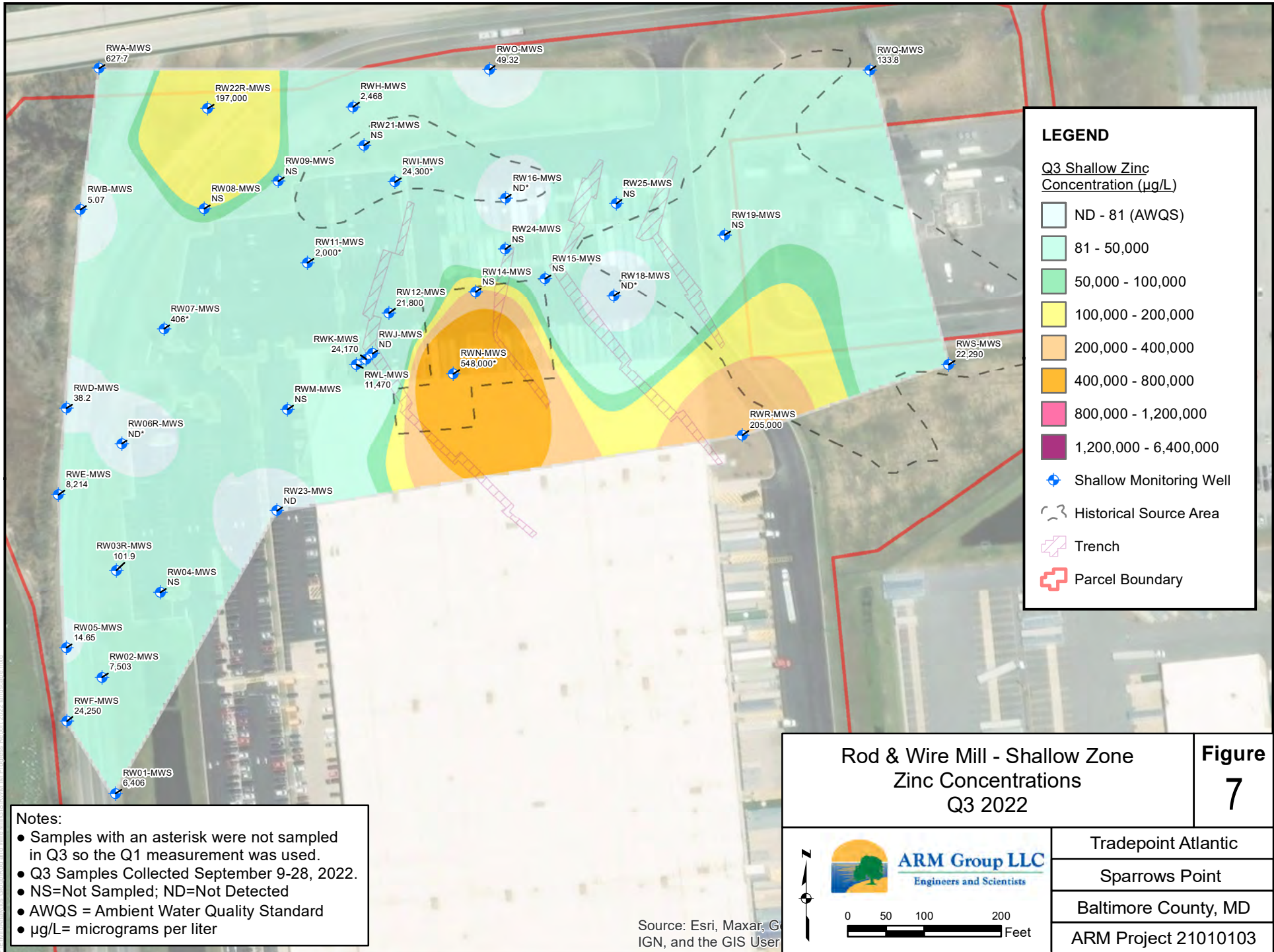
RWI-MWS 1.82  
RW16-MWS 2.69  
RW14-MWS 2.72  
RW15-MWS 2.70  
RW18-MWS 4.98  
RWN-MWS 2.71

RWO-MWS 1.20  
RW21-MWS 1.02  
RW24-MWS 2.68  
RWJ-MWS 2.56

RW25-MWS 2.68  
RW19-MWS 5.14  
RWR-MWS 3.12

RWQ-MWS 5.50  
RWS-MWS 7.11

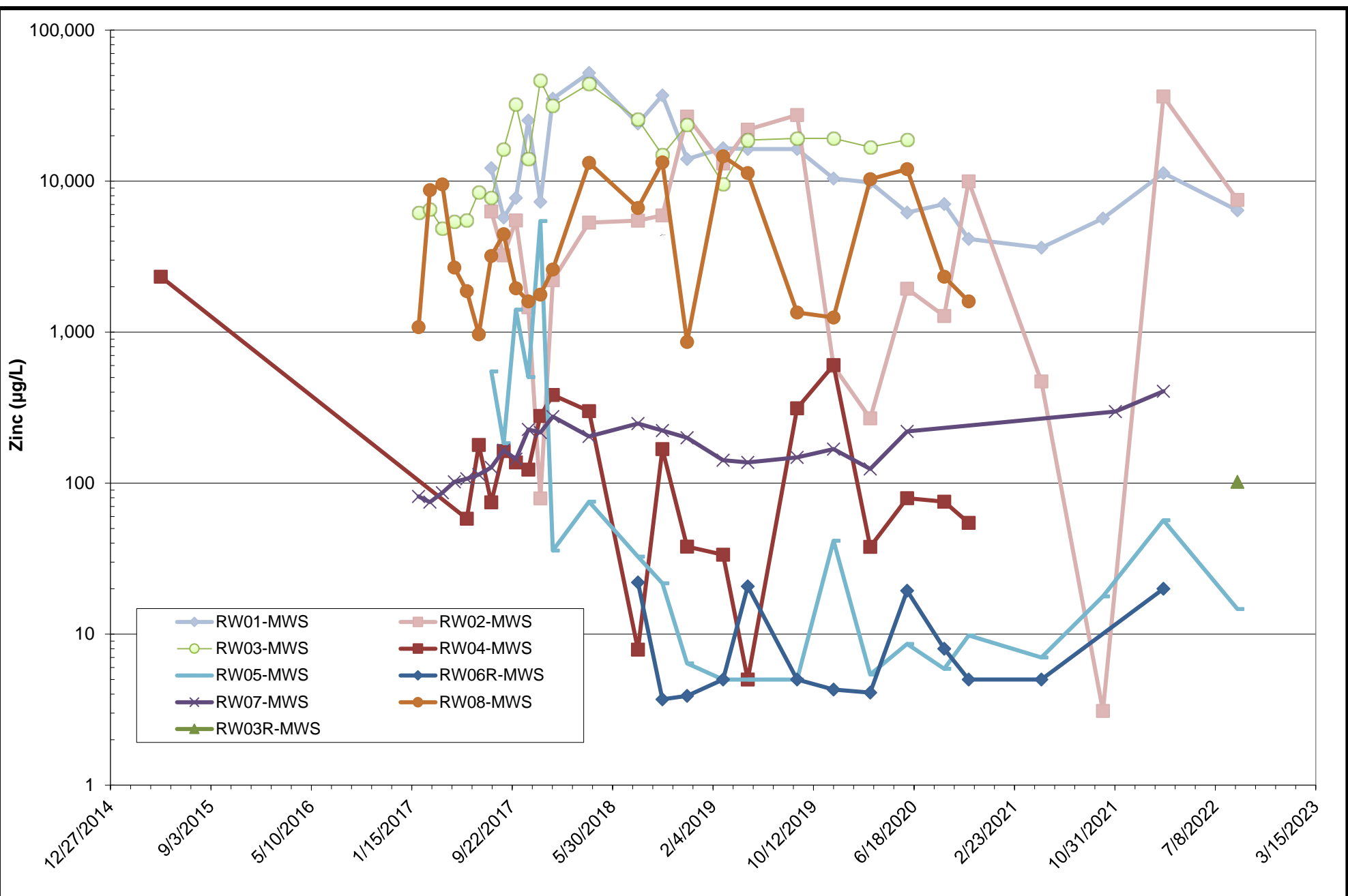




Notes:

- Samples with an asterisk were not sampled in Q3 so the Q1 measurement was used.
- Q3 Samples Collected September 9-28, 2022.
- NS=Not Sampled; ND=Not Detected
- AWQS = Ambient Water Quality Standard
- µg/L= micrograms per liter

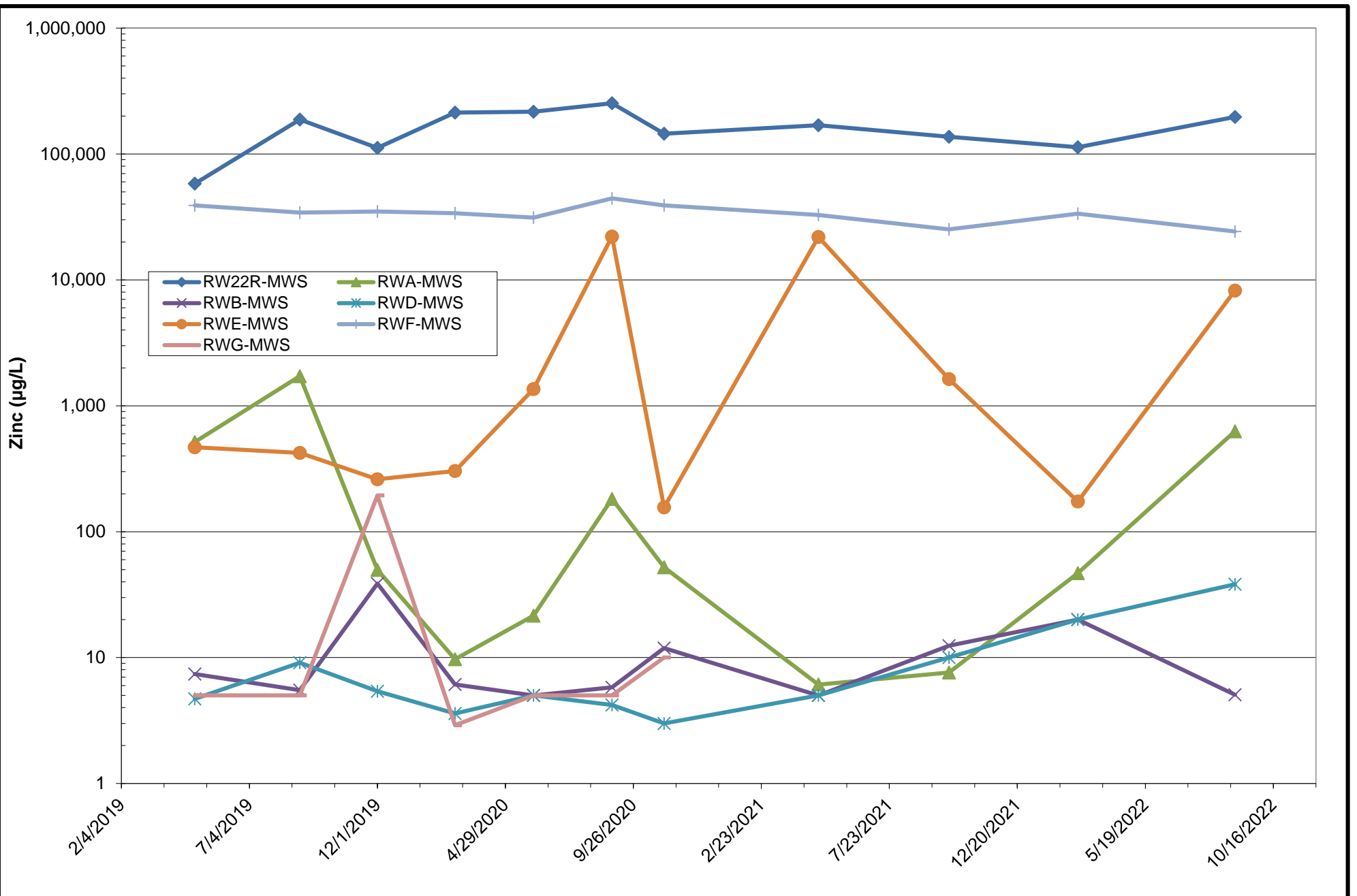
Source: Esri, Maxar, IGN, and the GIS User



Rod and Wire Mill  
Tradeport Atlantic  
Sparrows Point, Maryland

Shallow Perimeter Zinc  
Concentrations (Original Wells)  
February 2023

Figure  
8



**ARM Group LLC**  
Engineers and Scientists

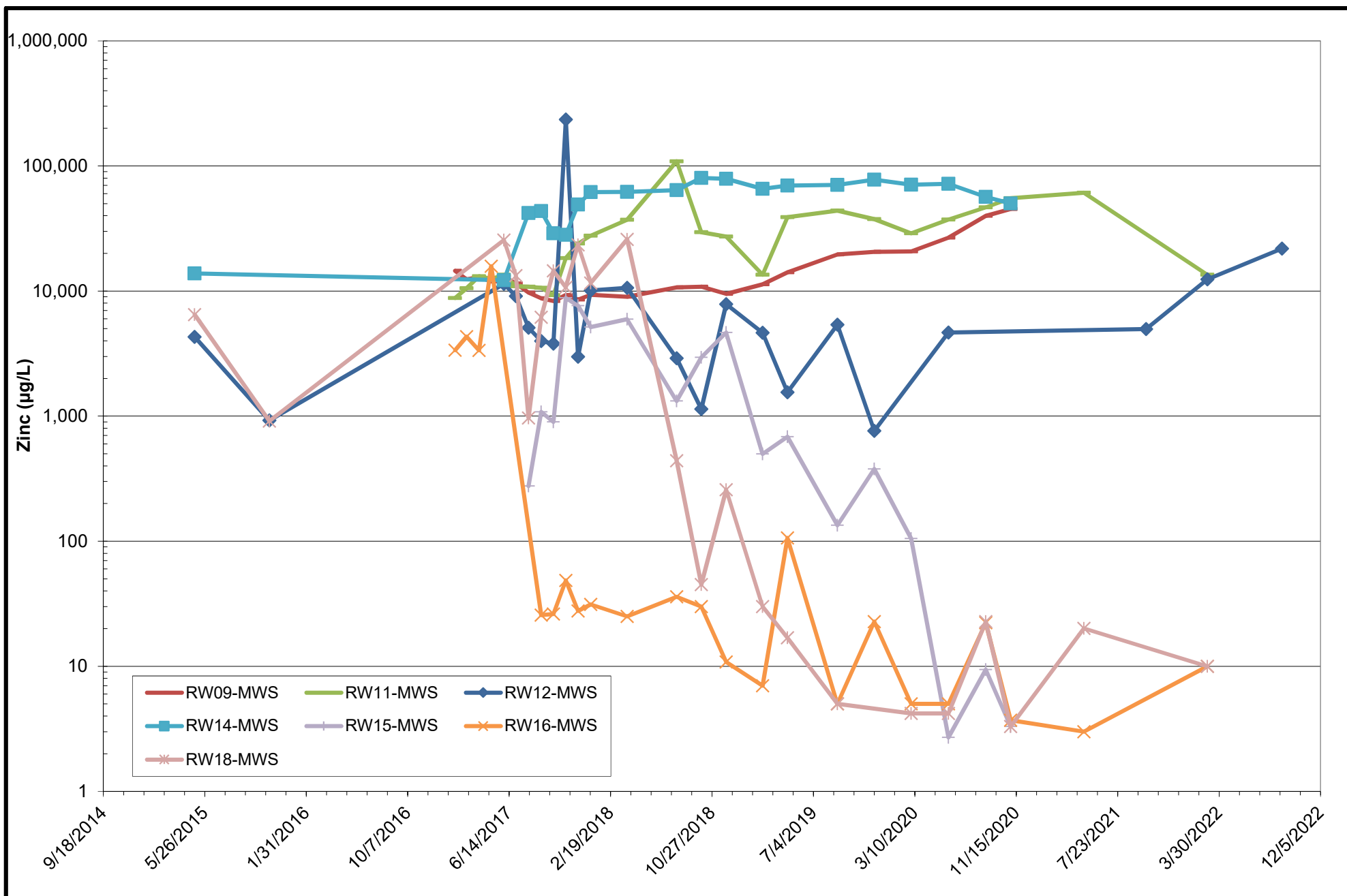
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

### Shallow Perimeter Zinc Concentrations (Supplemental Wells)

February 2023

**Figure  
9**



**ARM Group LLC**  
Engineers and Scientists

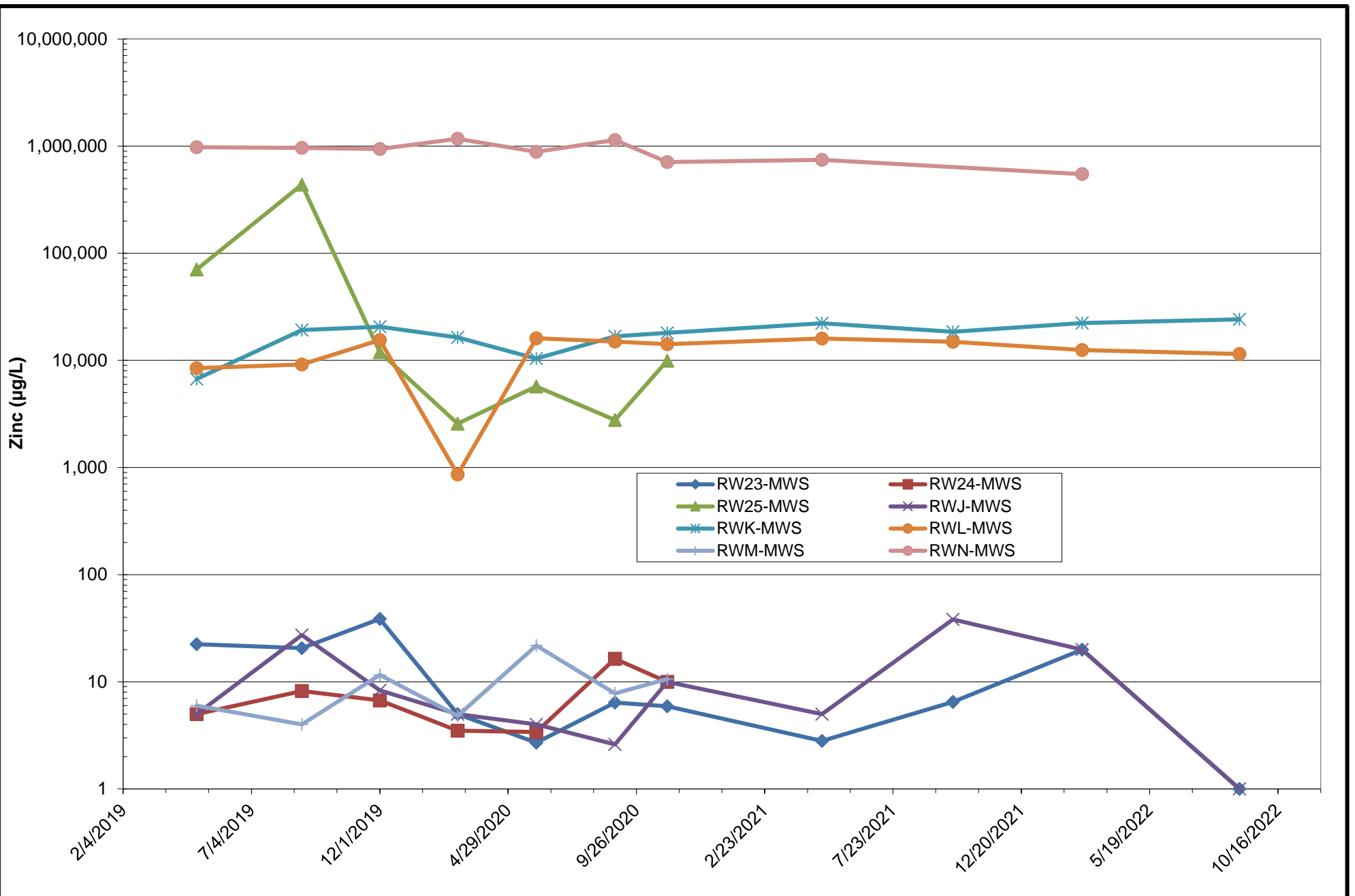
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

## Shallow Interior Zinc Concentrations (Original Wells)

February 2023

**Figure  
10**



**ARM Group LLC**  
Engineers and Scientists

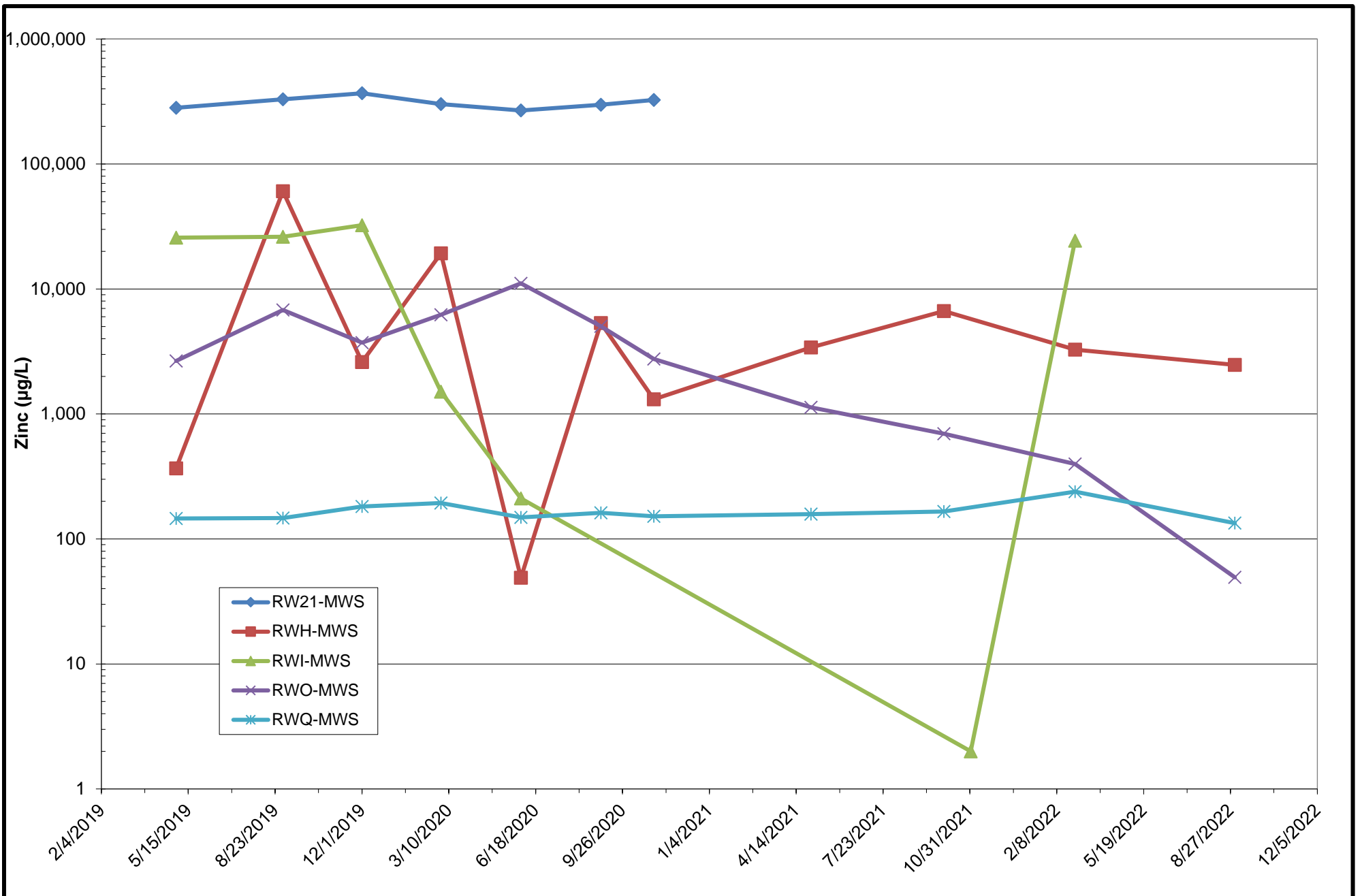
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

### Shallow Interior Zinc Concentrations (Supplemental Wells)

February 2023

**Figure  
11**



**ARM Group LLC**  
Engineers and Scientists

Rod and Wire Mill  
Tradeport Atlantic

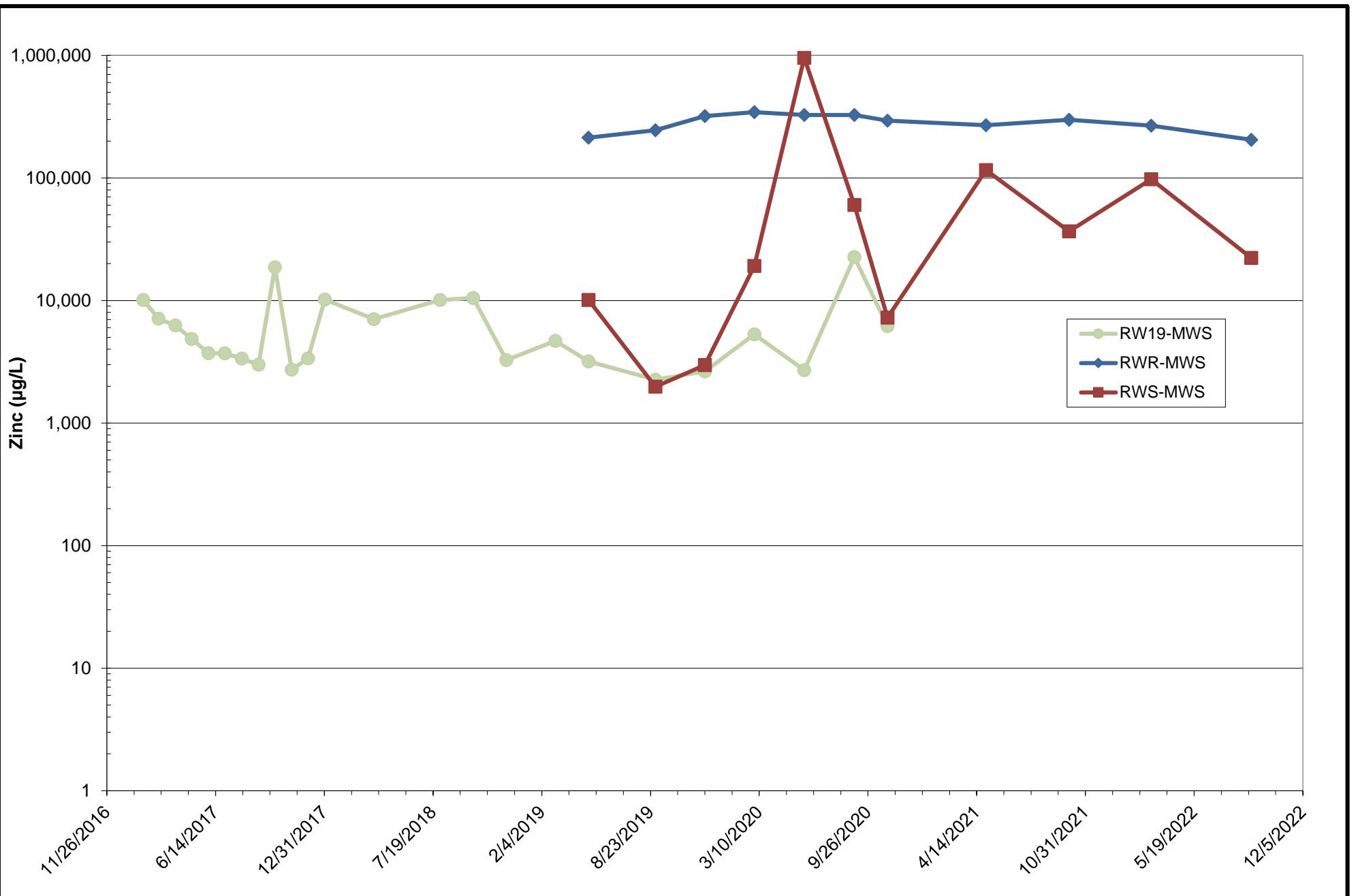
Sparrows Point, Maryland

### Shallow Delineation Wells Zinc Concentrations

February 2023

**Figure  
12**





**ARM Group LLC**  
Engineers and Scientists

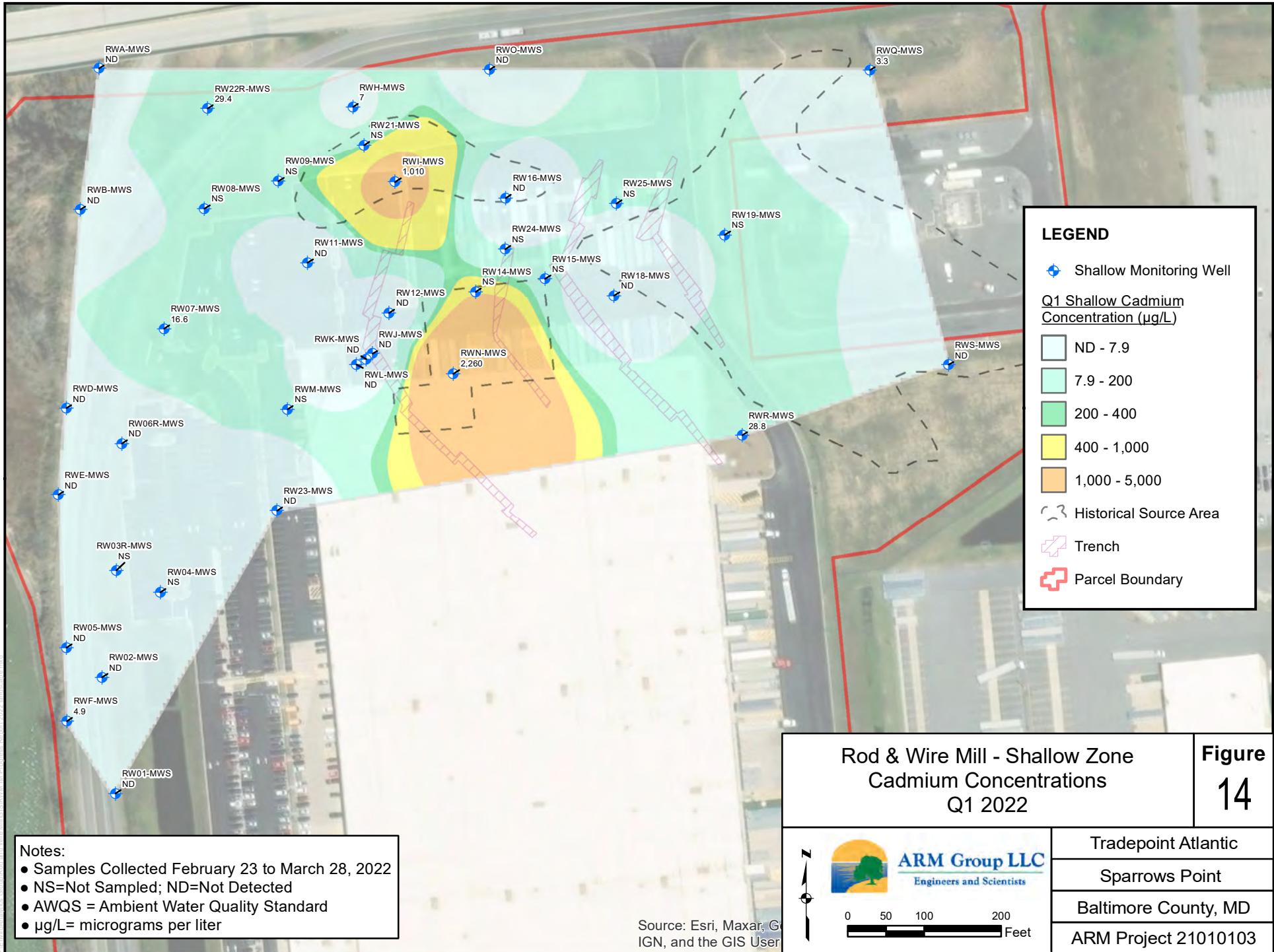
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

### Shallow Upgradient Zinc Concentrations



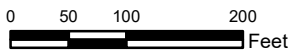
February 2023

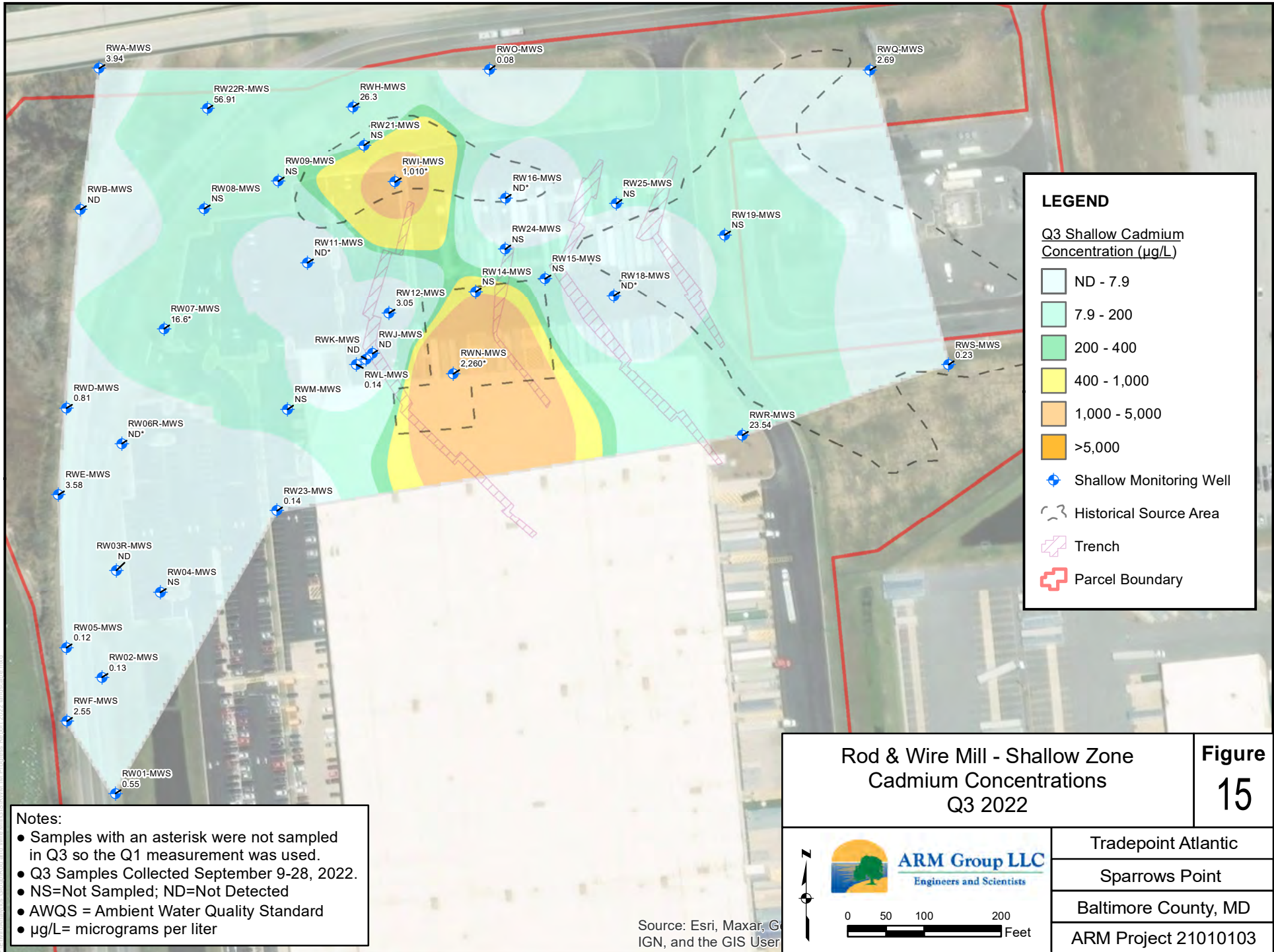
**Figure  
13**



**LEGEND**

- ◆ Shallow Monitoring Well
- Q1 Shallow Cadmium Concentration (µg/L)**
  - ND - 7.9
  - 7.9 - 200
  - 200 - 400
  - 400 - 1,000
  - 1,000 - 5,000
- ⊞ Historical Source Area
- ⊞ Trench
- ⊞ Parcel Boundary

<b>Rod &amp; Wire Mill - Shallow Zone Cadmium Concentrations Q1 2022</b>		<b>Figure 14</b>
 <b>ARM Group LLC</b> Engineers and Scientists		Tradepoint Atlantic Sparrows Point Baltimore County, MD ARM Project 21010103
 		



**LEGEND**

**Q3 Shallow Cadmium Concentration (µg/L)**


- ND - 7.9
- 7.9 - 200
- 200 - 400
- 400 - 1,000
- 1,000 - 5,000
- >5,000
- ⊕ Shallow Monitoring Well
- ⊖ Historical Source Area
- ⊞ Trench
- ⊞ Parcel Boundary

**Notes:**

- Samples with an asterisk were not sampled in Q3 so the Q1 measurement was used.
- Q3 Samples Collected September 9-28, 2022.
- NS=Not Sampled; ND=Not Detected
- AWQS = Ambient Water Quality Standard
- µg/L= micrograms per liter

Rod & Wire Mill - Shallow Zone  
Cadmium Concentrations  
Q3 2022

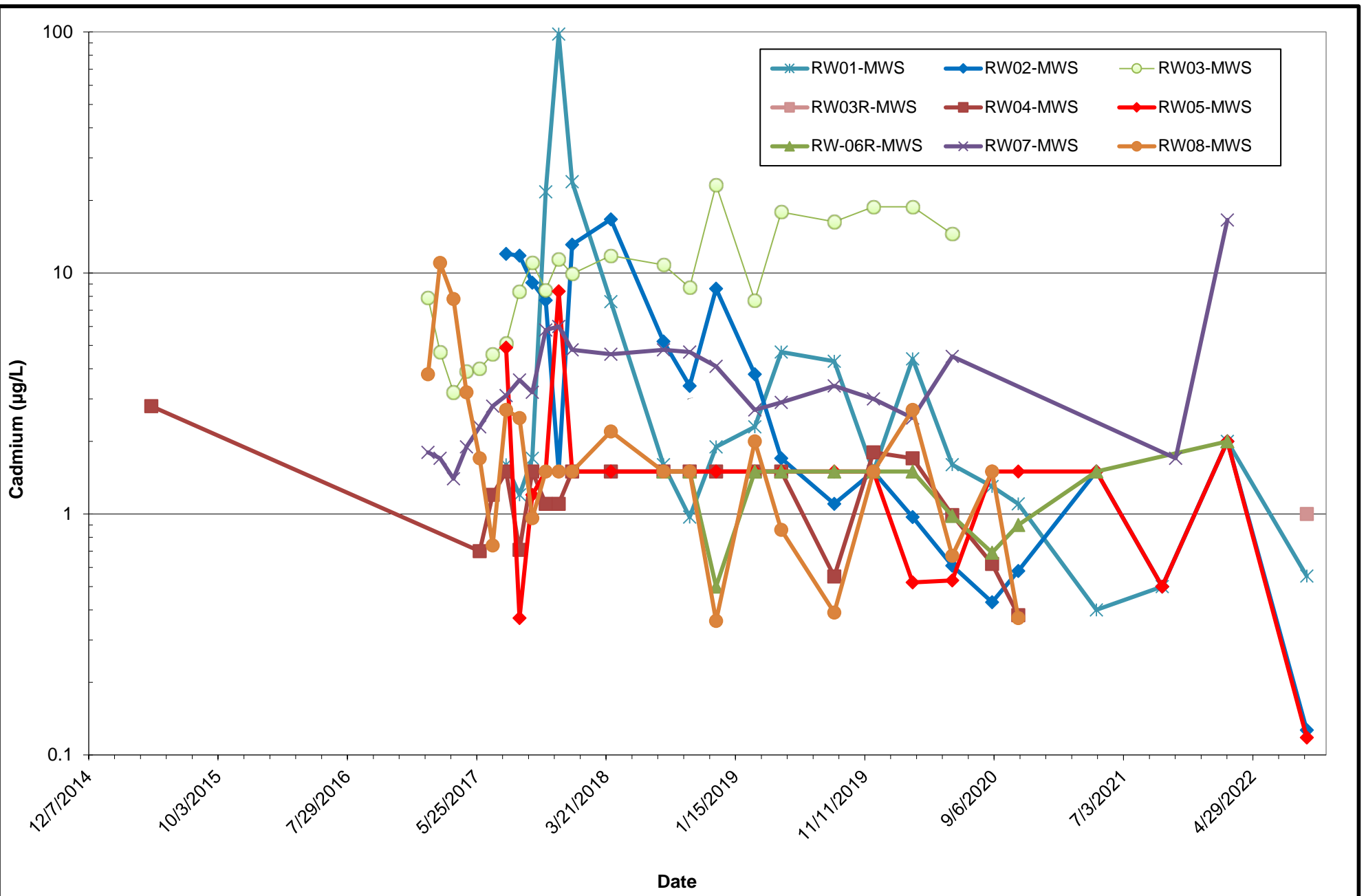
**Figure 15**


**ARM Group LLC**  
 Engineers and Scientists

0 50 100 200  
 Feet

Tradepoint Atlantic
Sparrows Point
Baltimore County, MD
ARM Project 21010103

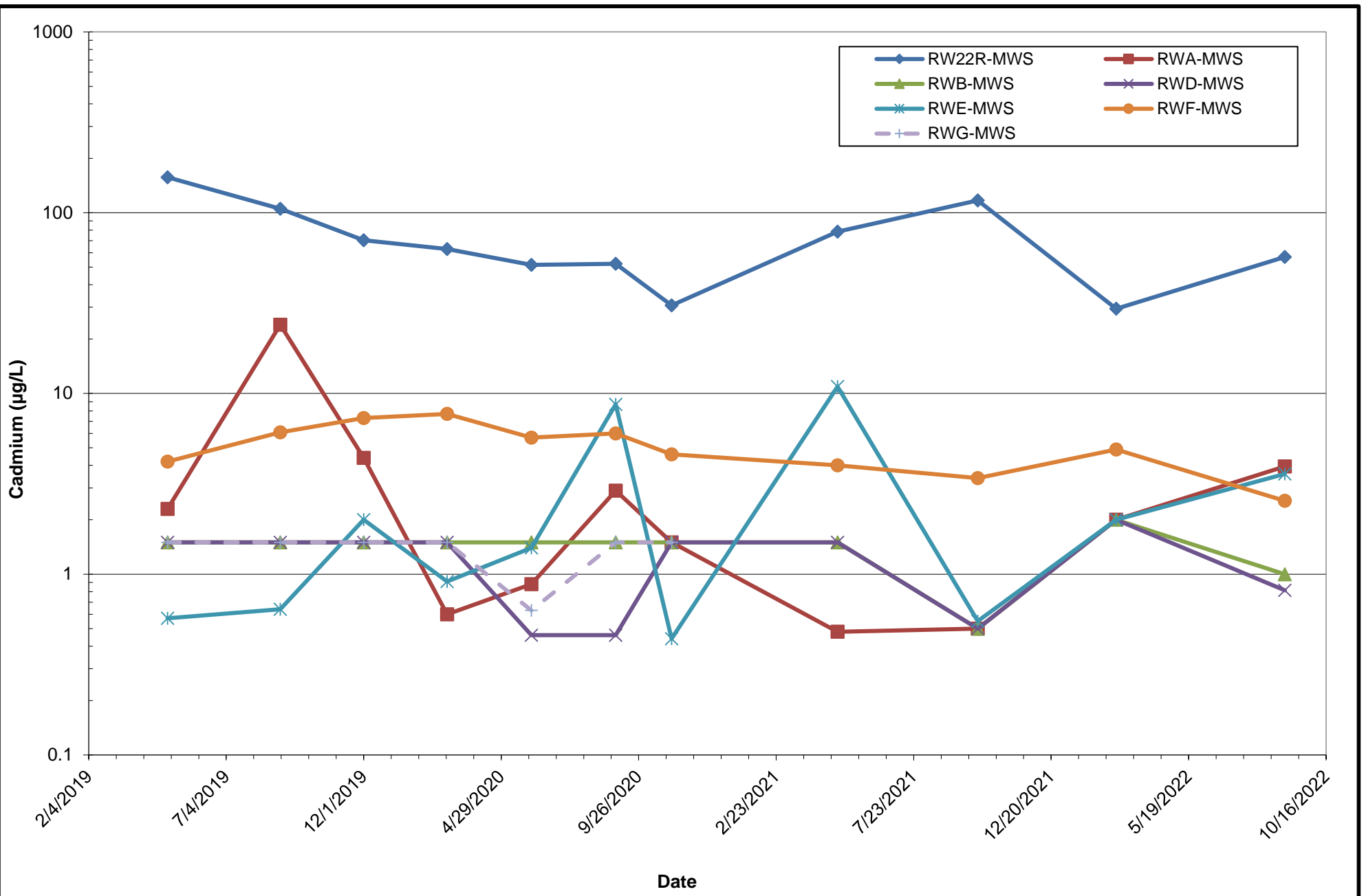
Source: Esri, Maxar, IGN, and the GIS User



Rod and Wire Mill  
Tradeport Atlantic  
Sparrows Point, Maryland

Shallow Perimeter Cadmium  
Concentrations (Original Wells)  
February 2023

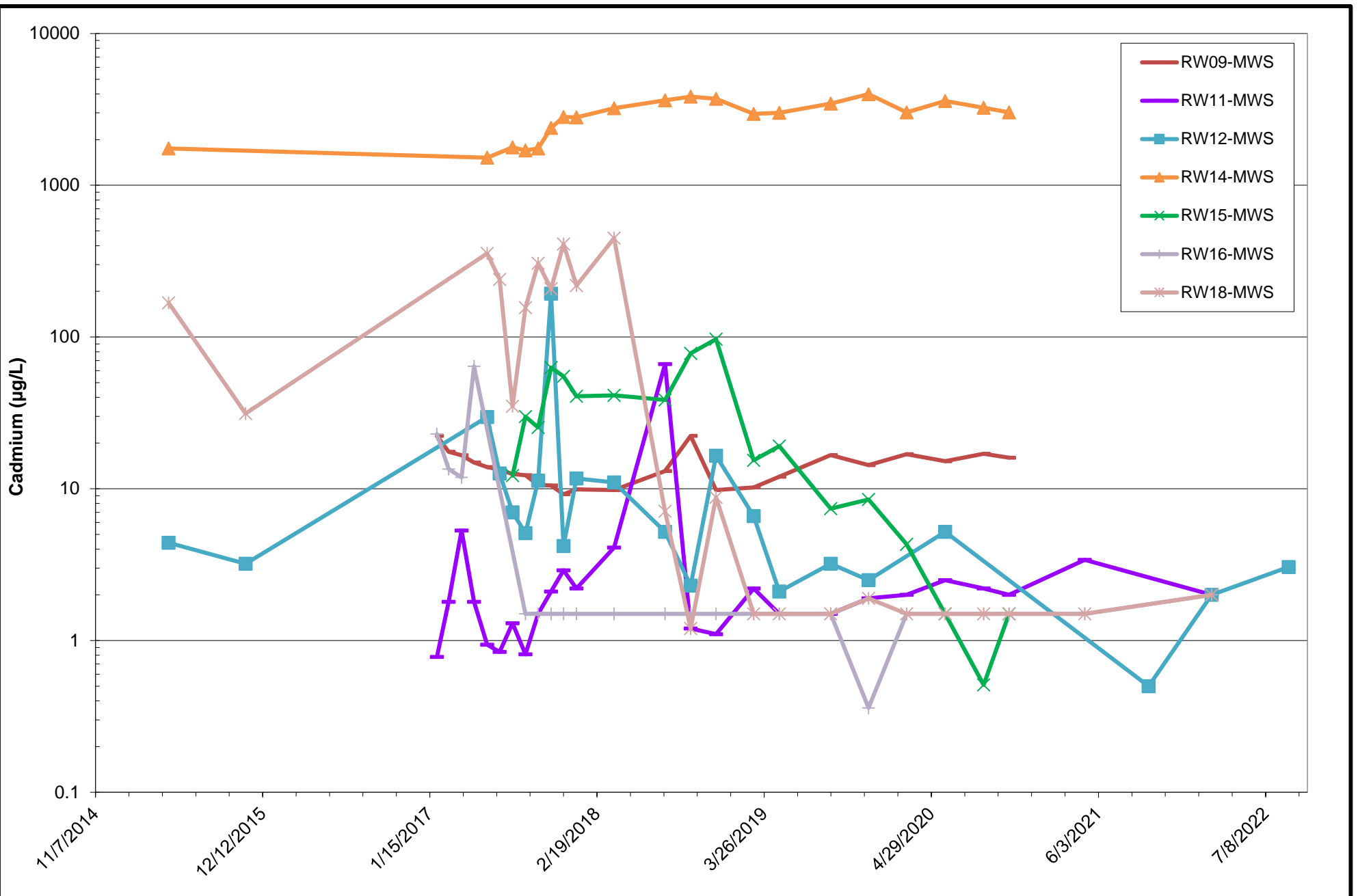
**Figure  
16**



Rod and Wire Mill  
Tradeport Atlantic  
Sparrows Point, Maryland

Shallow Perimeter Cadmium  
Concentrations (Supplemental Wells)  
February 2023

**Figure  
17**



**ARM Group LLC**  
Engineers and Scientists

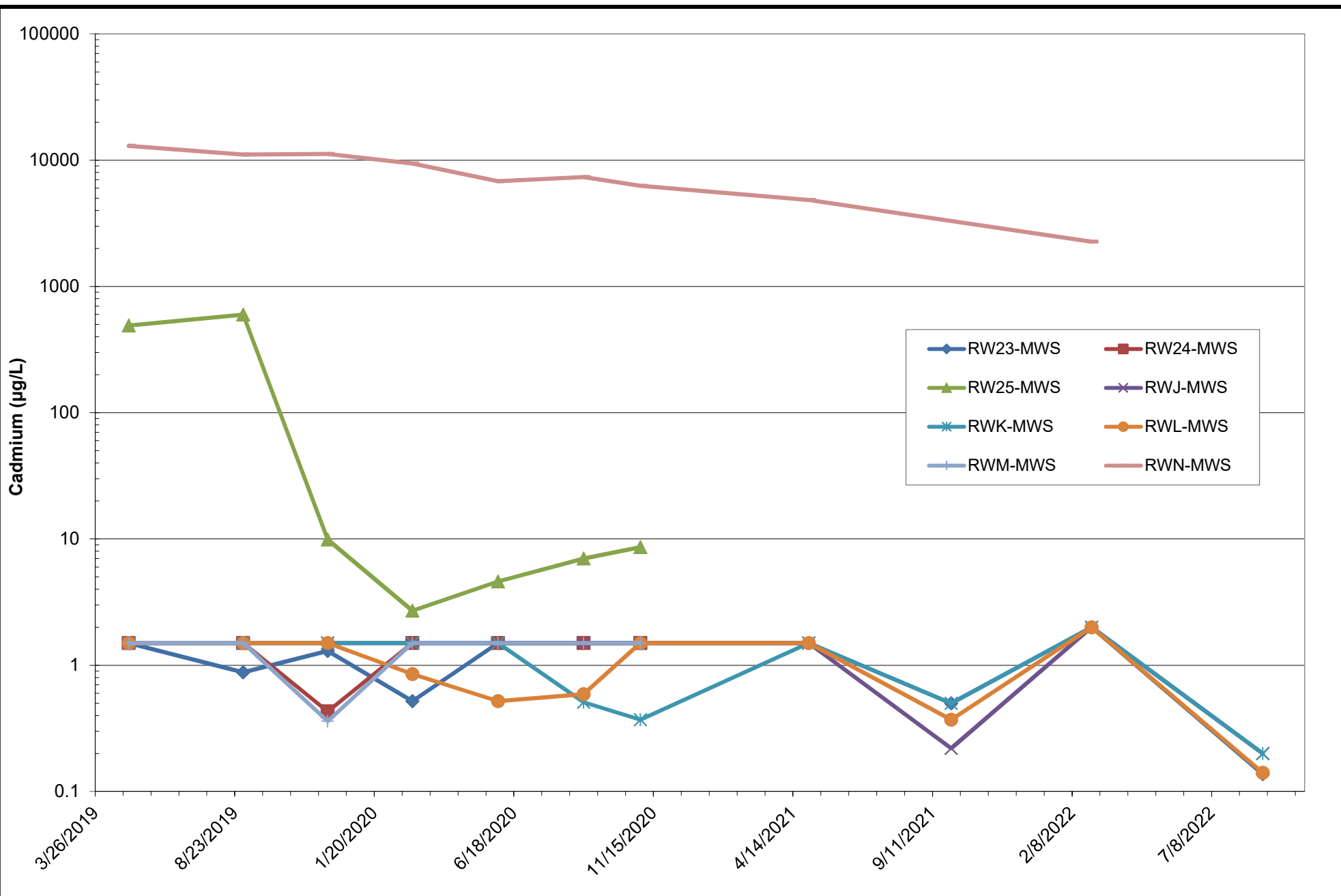
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

### Shallow Interior Cadmium Concentrations (Original Wells)

February 2023

**Figure  
18**



**ARM Group LLC**  
Engineers and Scientists

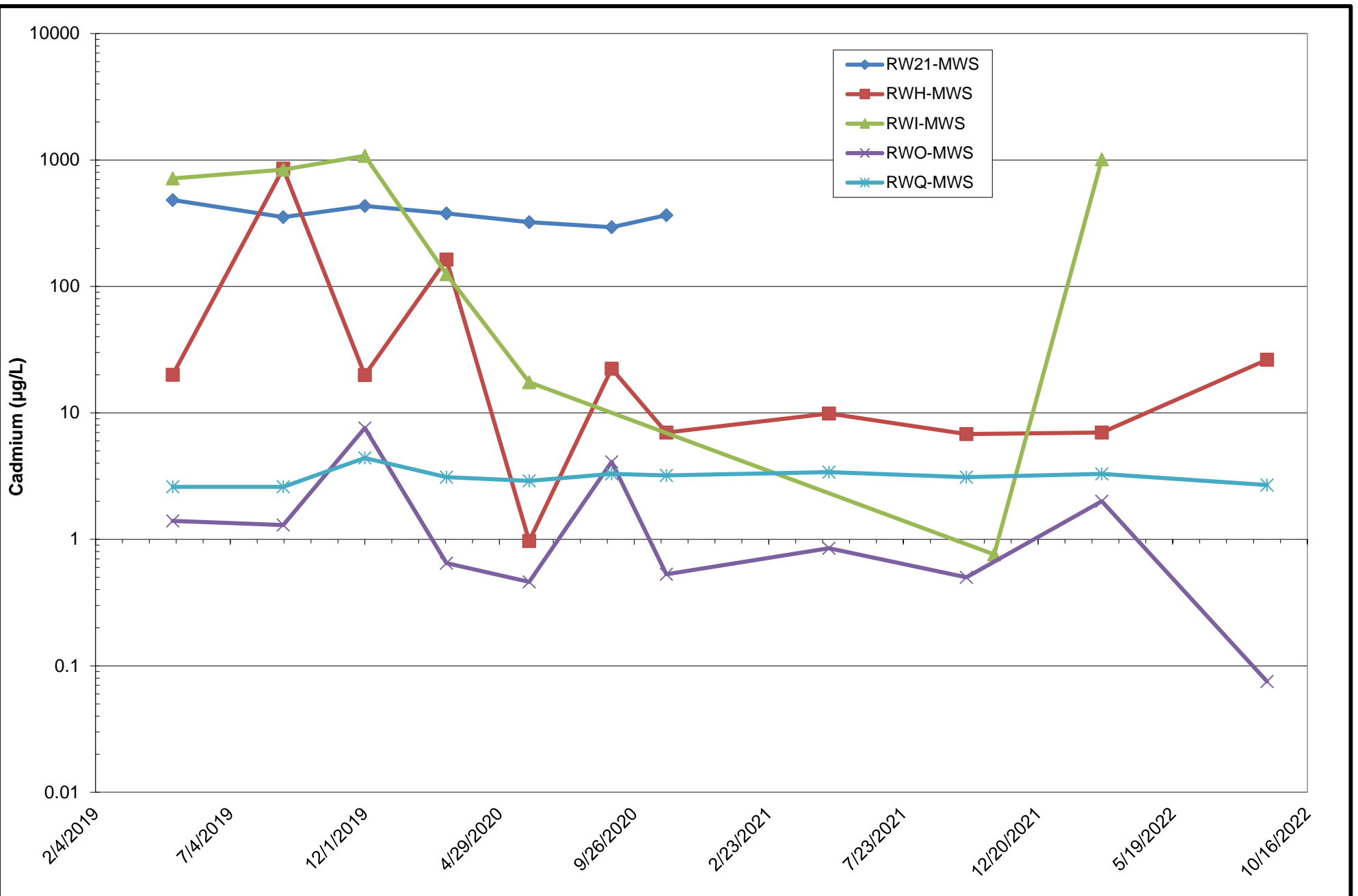
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

### Shallow Interior Cadmium Concentrations (Supplemental Wells)

February 2023

**Figure  
19**



**ARM Group LLC**  
Engineers and Scientists

Rod and Wire Mill  
Tradeport Atlantic

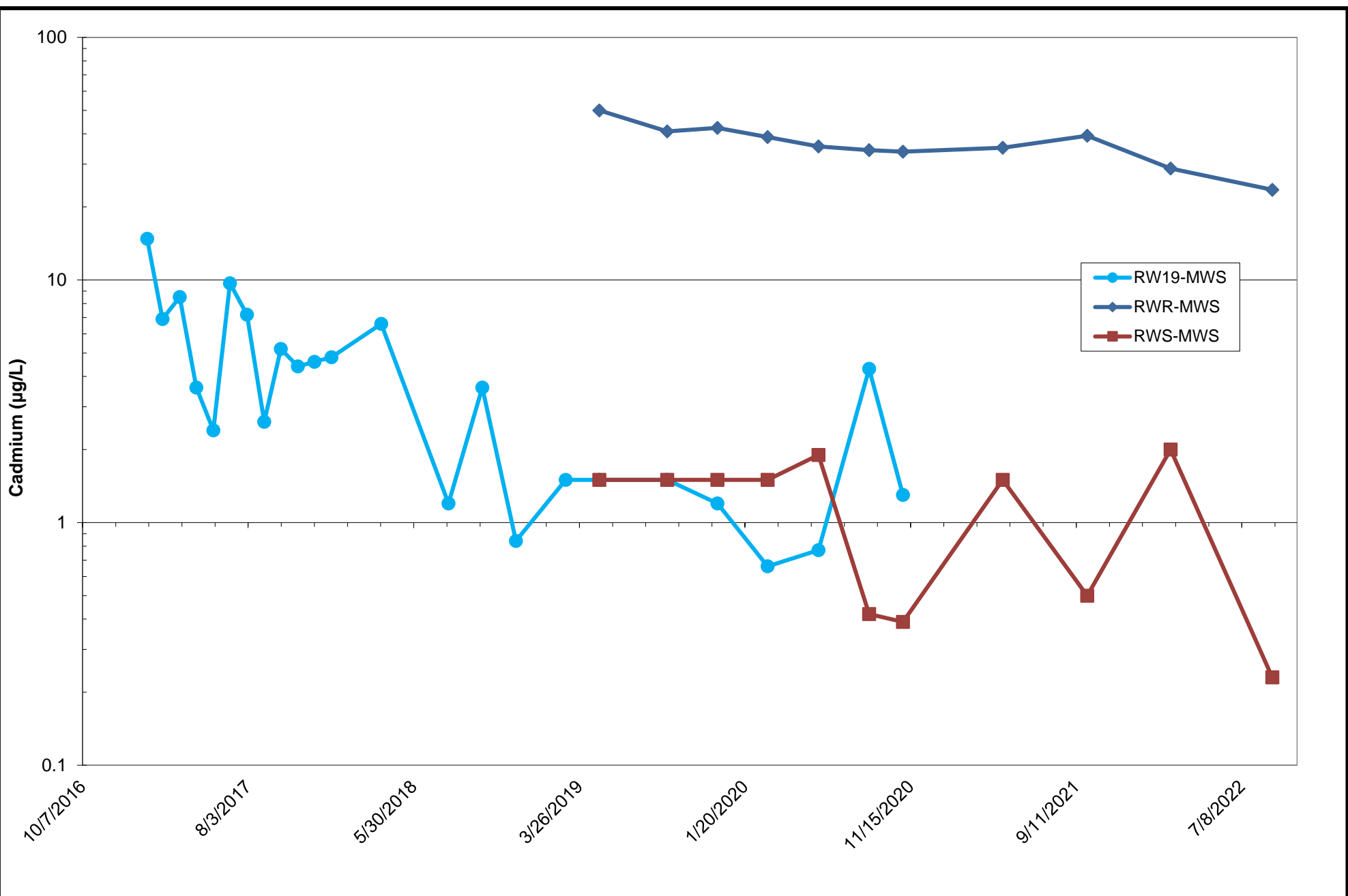
Sparrows Point, Maryland

## Shallow Delineation Cadmium Concentrations

February 2023

**Figure  
20**



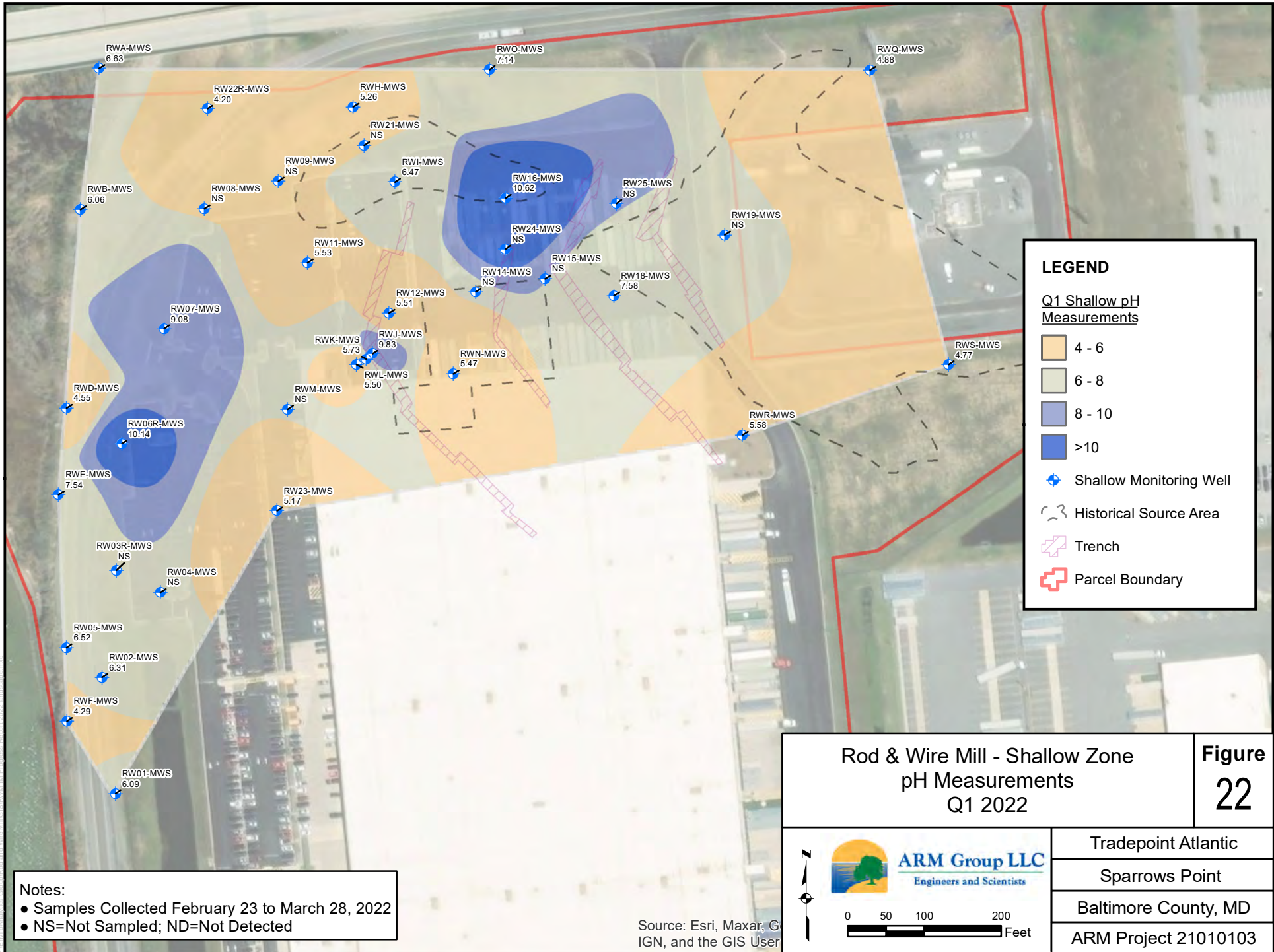


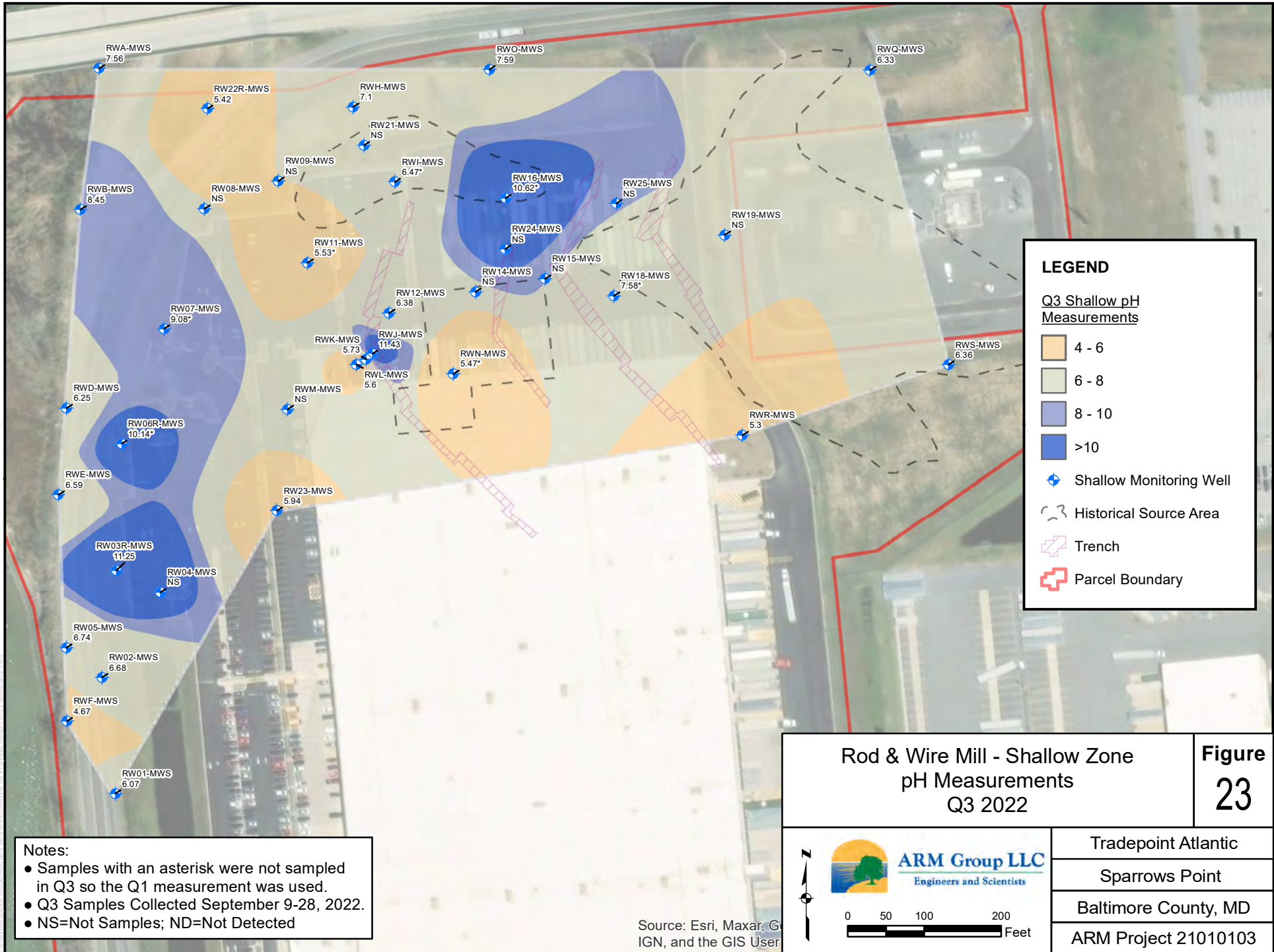
**ARM Group LLC**  
Engineers and Scientists

Rod and Wire Mill  
Tradeport Atlantic  
Sparrows Point, Maryland

Shallow Upgradient  
Cadmium Concentration  
February 2023

**Figure 21**





RWA-MWS  
7.56

RW22R-MWS  
5.42

RWH-MWS  
7.1

RWO-MWS  
7.59

RWQ-MWS  
6.33

RWB-MWS  
8.45

RW08-MWS  
NS

RW21-MWS  
NS

RW09-MWS  
NS

RW1-MWS  
6.47\*

RW16-MWS  
10.62\*

RW25-MWS  
NS

RW19-MWS  
NS

RW11-MWS  
5.53\*

RW14-MWS  
NS

RW15-MWS  
NS

RW18-MWS  
7.58\*

RWS-MWS  
6.36

RW07-MWS  
9.08\*

RW12-MWS  
6.38

RWK-MWS  
5.73

RWJ-MWS  
11.43

RWN-MWS  
5.47\*

RWR-MWS  
5.3

RWD-MWS  
6.25

RW06R-MWS  
10.14\*

RWM-MWS  
NS

RWE-MWS  
6.59

RW23-MWS  
5.94

RW03R-MWS  
11.25

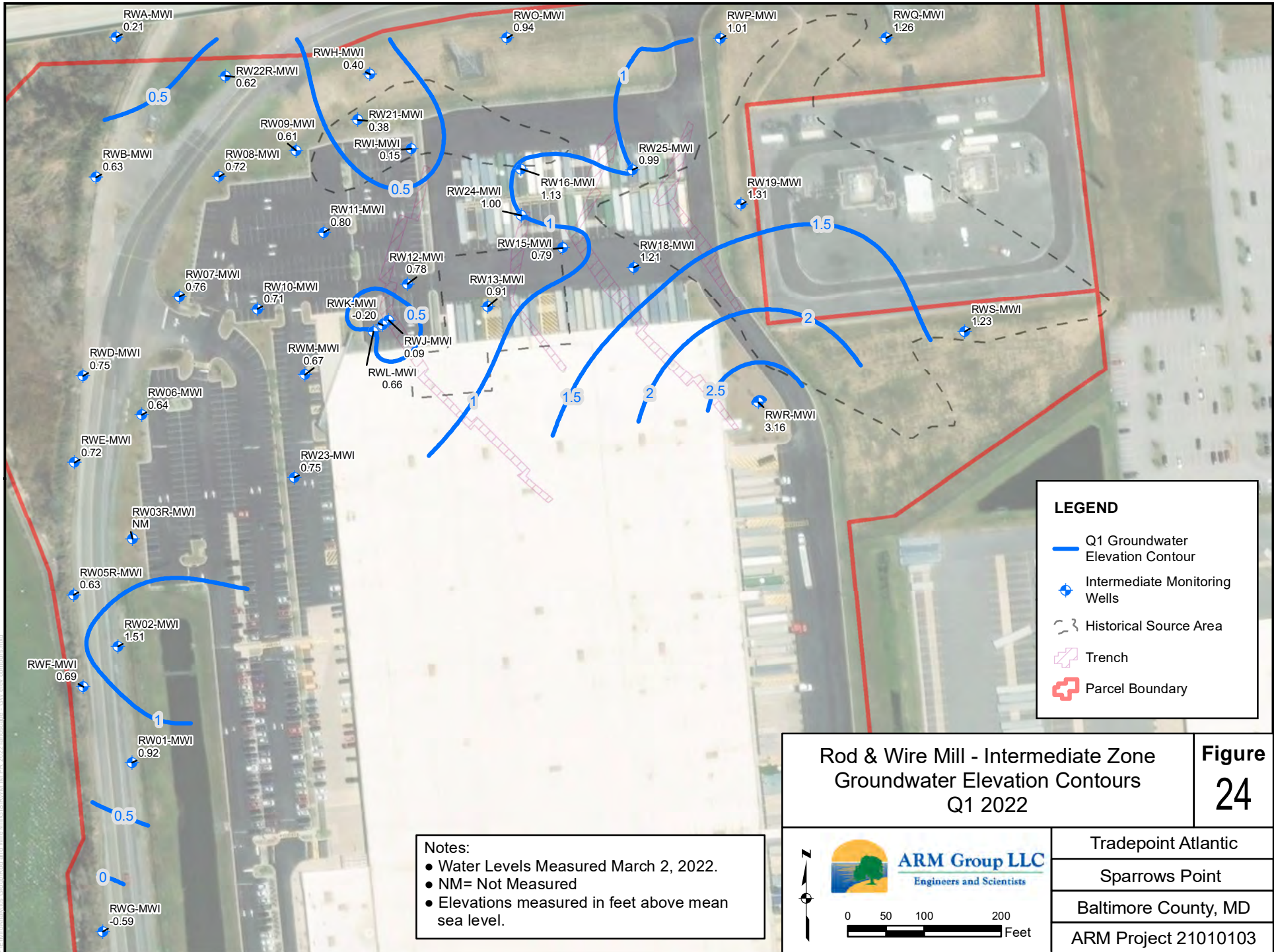
RW04-MWS  
NS

RW05-MWS  
6.74

RW02-MWS  
6.68

RWF-MWS  
4.67

RW01-MWS  
6.07



**LEGEND**

- Q1 Groundwater Elevation Contour
- ◆ Intermediate Monitoring Wells
- Historical Source Area
- Trench
- Parcel Boundary

**Rod & Wire Mill - Intermediate Zone  
Groundwater Elevation Contours  
Q1 2022**

**Figure  
24**

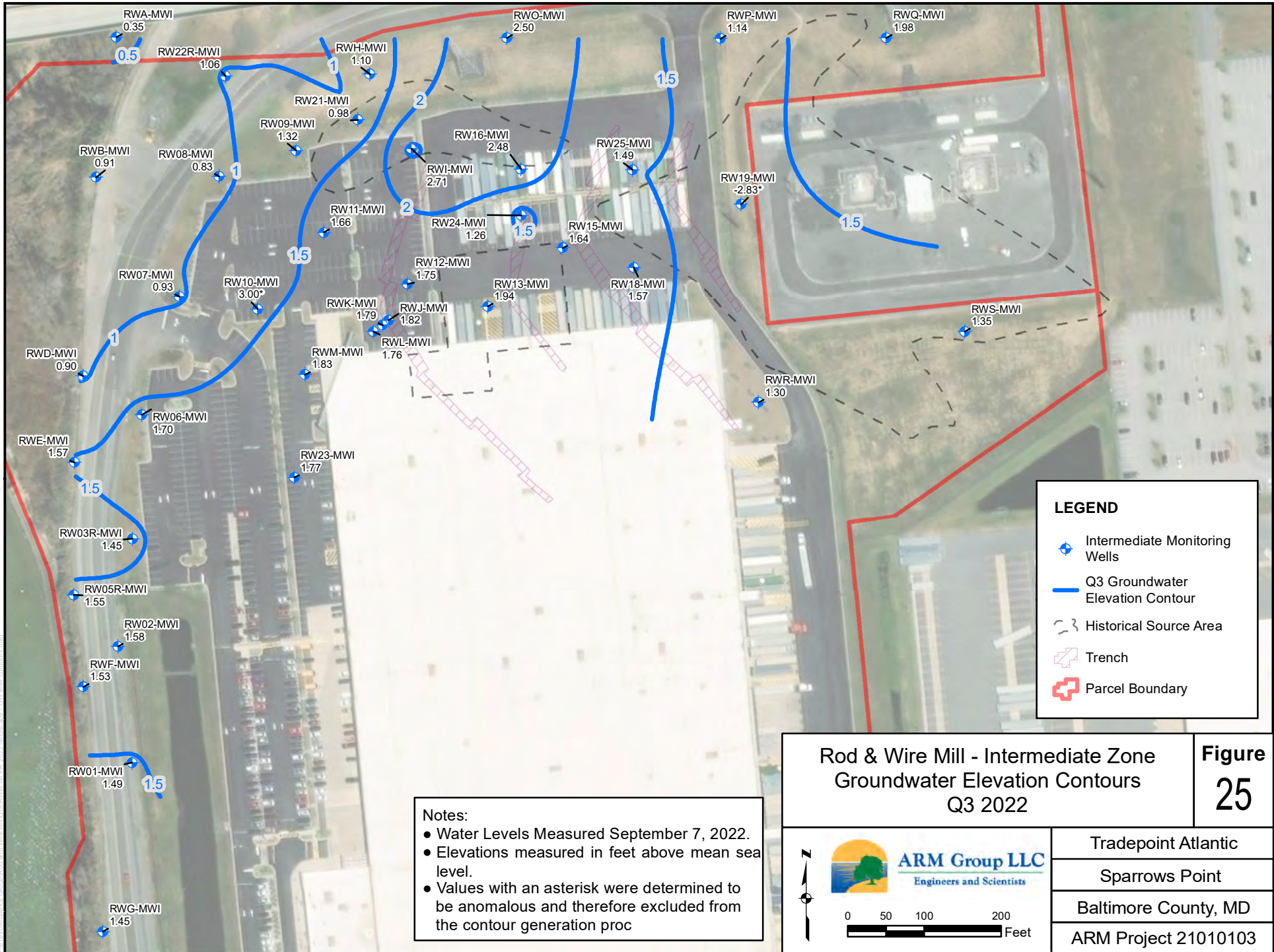
**Notes:**

- Water Levels Measured March 2, 2022.
- NM= Not Measured
- Elevations measured in feet above mean sea level.

**ARM Group LLC**  
Engineers and Scientists

0 50 100 200  
Feet

Tradepoint Atlantic
Sparrows Point
Baltimore County, MD
ARM Project 21010103



RWA-MWI 0.35

RWO-MWI 2.50

RWP-MWI 1.14

RWQ-MWI 1.98

0.5

RW22R-MWI 1.06

RWH-MWI 1.10

1.5

RW21-MWI 0.98

RW16-MWI 2.48

RW25-MWI 1.49

RW19-MWI -2.83\*

RWB-MWI 0.91

RW08-MWI 0.83

RWI-MWI 2.71

RW09-MWI 1.32

RW24-MWI 1.26

RW15-MWI 1.64

RW07-MWI 0.93

RW10-MWI 3.00\*

RW12-MWI 1.75

RW13-MWI 1.94

RW18-MWI 1.57

RWD-MWI 0.90

RWK-MWI 1.79

RWJ-MWI 1.82

RWL-MWI 1.76

RWR-MWI 1.30

RWS-MWI 1.35

RW06-MWI 1.70

RW23-MWI 1.77

RWE-MWI 1.57

RW03R-MWI 1.45

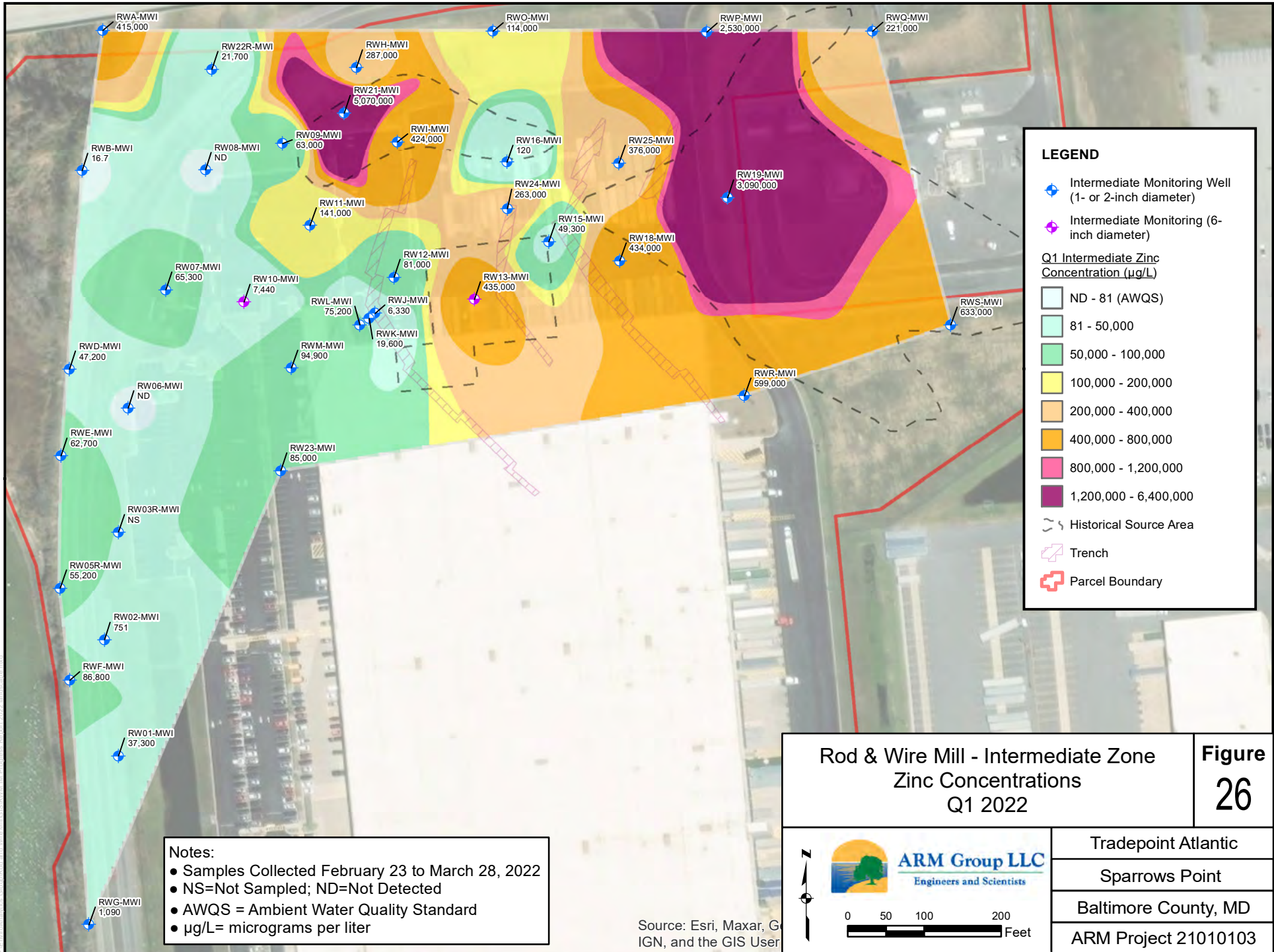
RW05R-MWI 1.55

RW02-MWI 1.58

RWF-MWI 1.53

RW01-MWI 1.49

RWG-MWI 1.45



Rod & Wire Mill - Intermediate Zone  
Zinc Concentrations  
Q1 2022

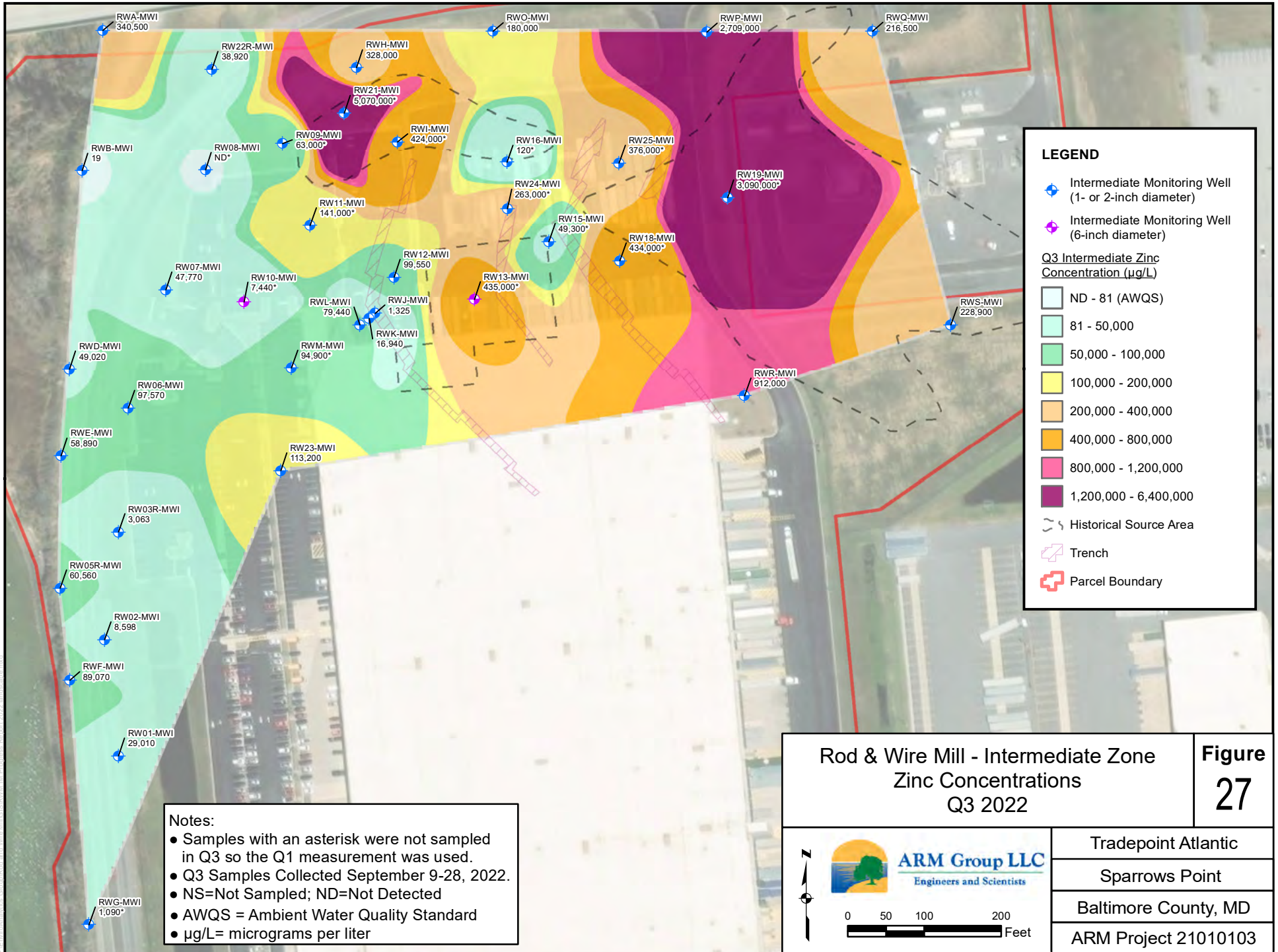
**Figure 26**

ARM Group LLC  
Engineers and Scientists

0 50 100 200 Feet

Tradepoint Atlantic  
Sparrows Point  
Baltimore County, MD  
ARM Project 21010103

Source: Esri, Maxar, IGN, and the GIS User



**LEGEND**

- Intermediate Monitoring Well (1- or 2-inch diameter)
- Intermediate Monitoring Well (6-inch diameter)

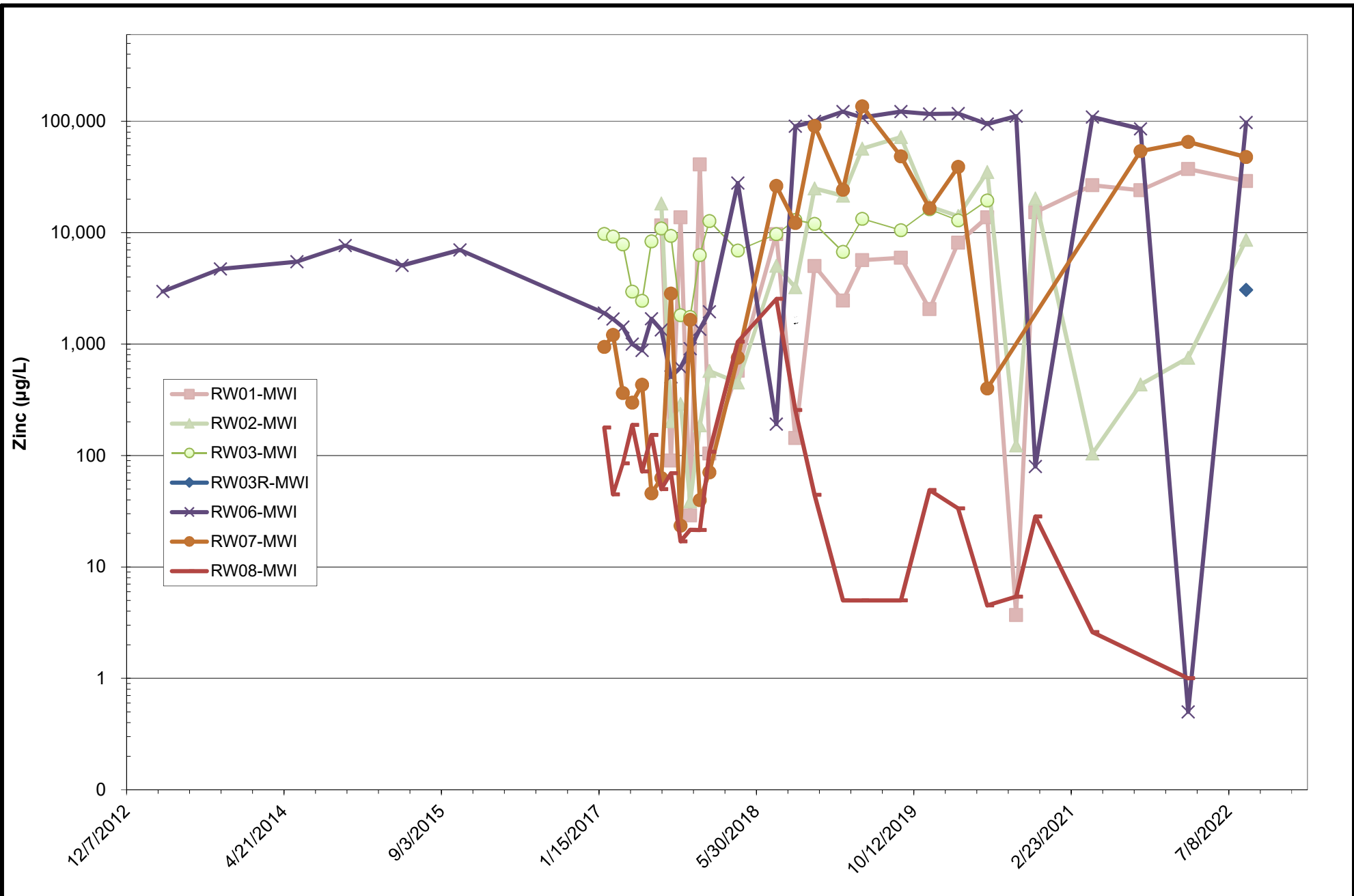
**Q3 Intermediate Zinc Concentration (µg/L)**

- ND - 81 (AWQS)
- 81 - 50,000
- 50,000 - 100,000
- 100,000 - 200,000
- 200,000 - 400,000
- 400,000 - 800,000
- 800,000 - 1,200,000
- 1,200,000 - 6,400,000

- Historical Source Area
- Trench
- Parcel Boundary

- Notes:**
- Samples with an asterisk were not sampled in Q3 so the Q1 measurement was used.
  - Q3 Samples Collected September 9-28, 2022.
  - NS=Not Sampled; ND=Not Detected
  - AWQS = Ambient Water Quality Standard
  - µg/L= micrograms per liter

<b>Rod &amp; Wire Mill - Intermediate Zone Zinc Concentrations Q3 2022</b>		<b>Figure 27</b>
<b>ARM Group LLC</b> Engineers and Scientists		Tradepoint Atlantic
		Sparrows Point
		Baltimore County, MD
ARM Project 21010103		



**ARM Group LLC**  
Engineers and Scientists

Rod and Wire Mill  
Tradeport Atlantic

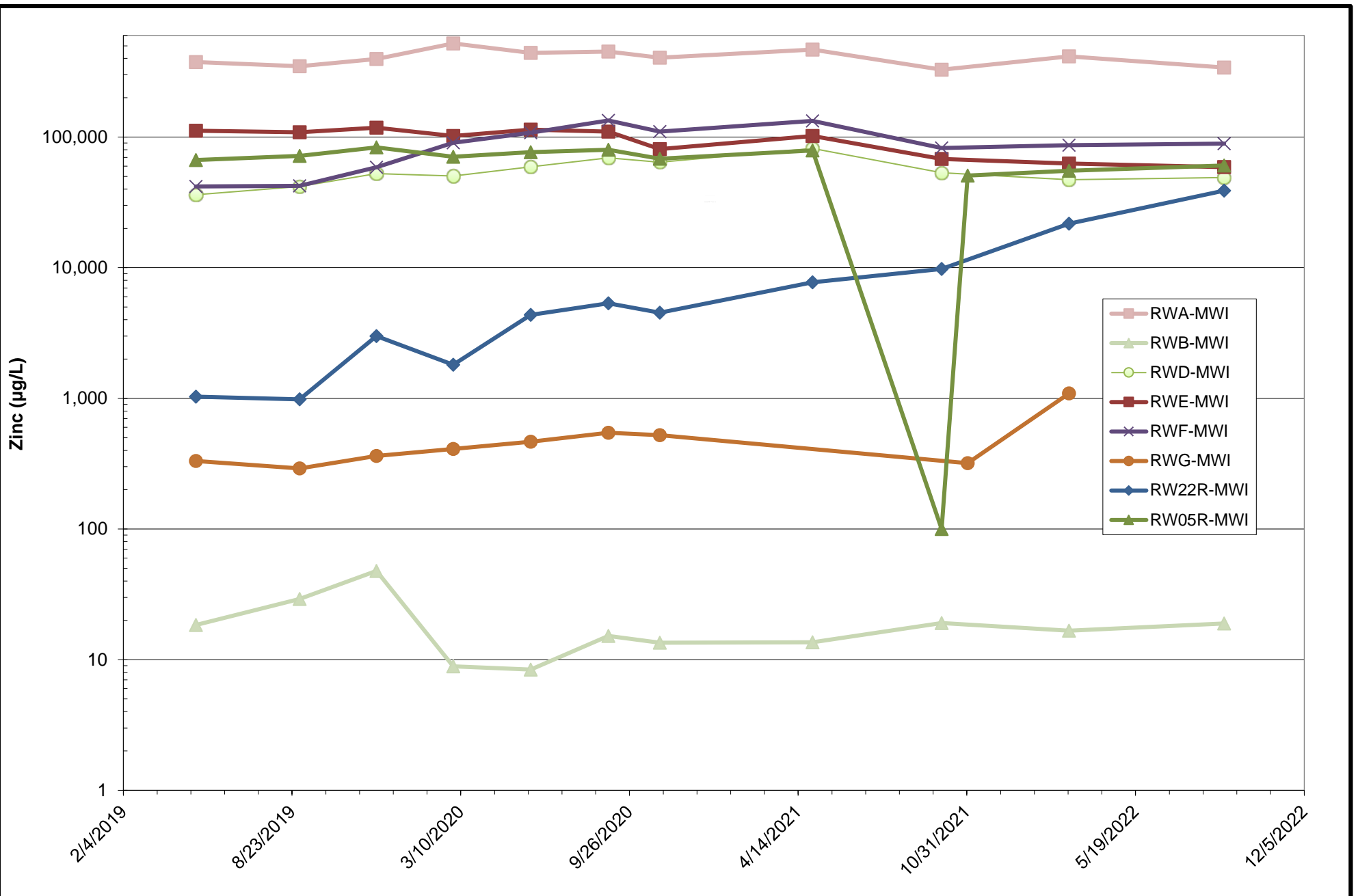
Sparrows Point, Maryland

**Intermediate Perimeter Zinc  
Concentrations (Original Wells)**

February 2023

**Figure  
28**





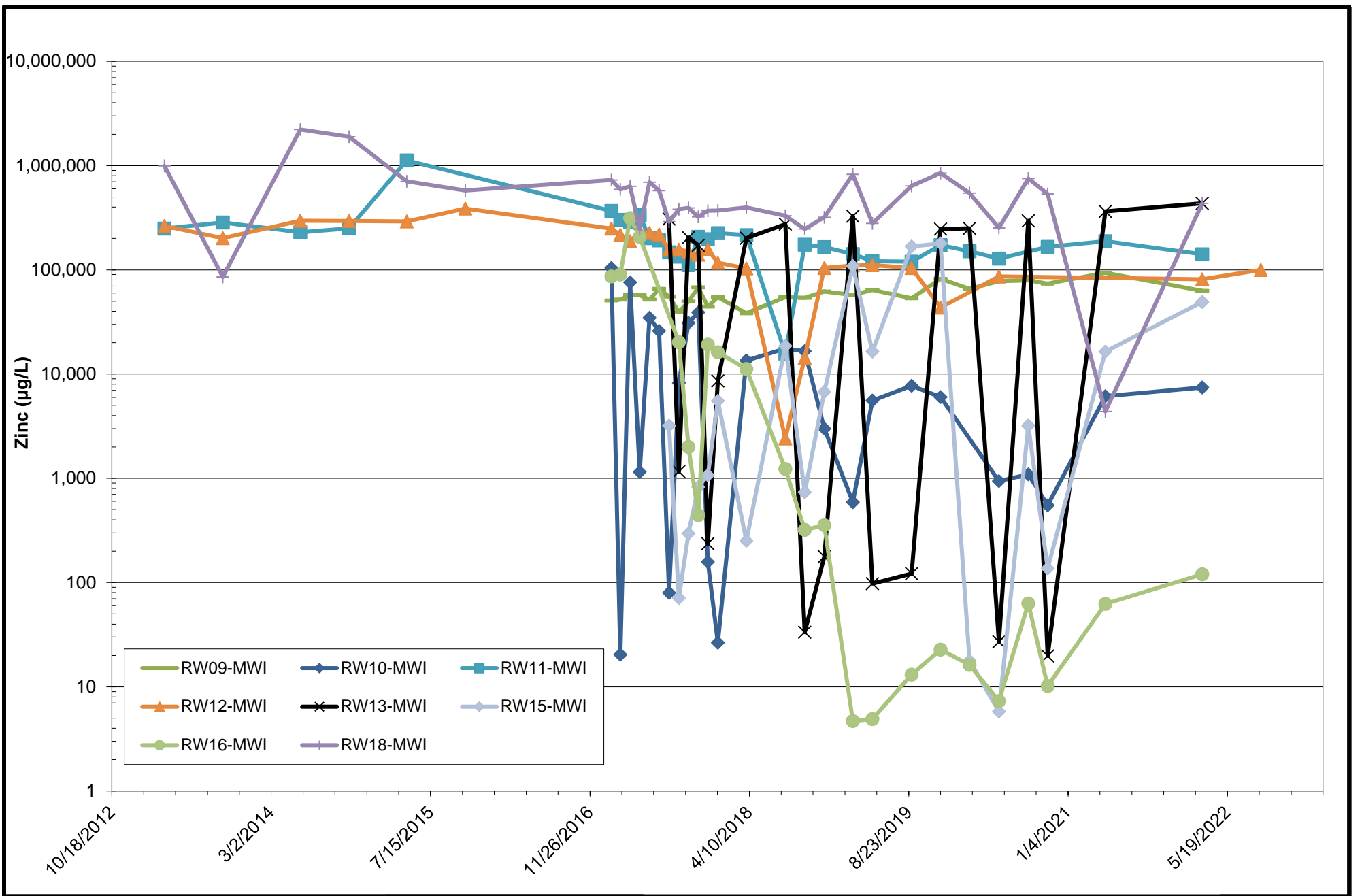
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

### Intermediate Perimeter Zinc Concentrations (Supplemental Wells)

February 2023

**Figure  
29**



**ARM Group LLC**  
Engineers and Scientists

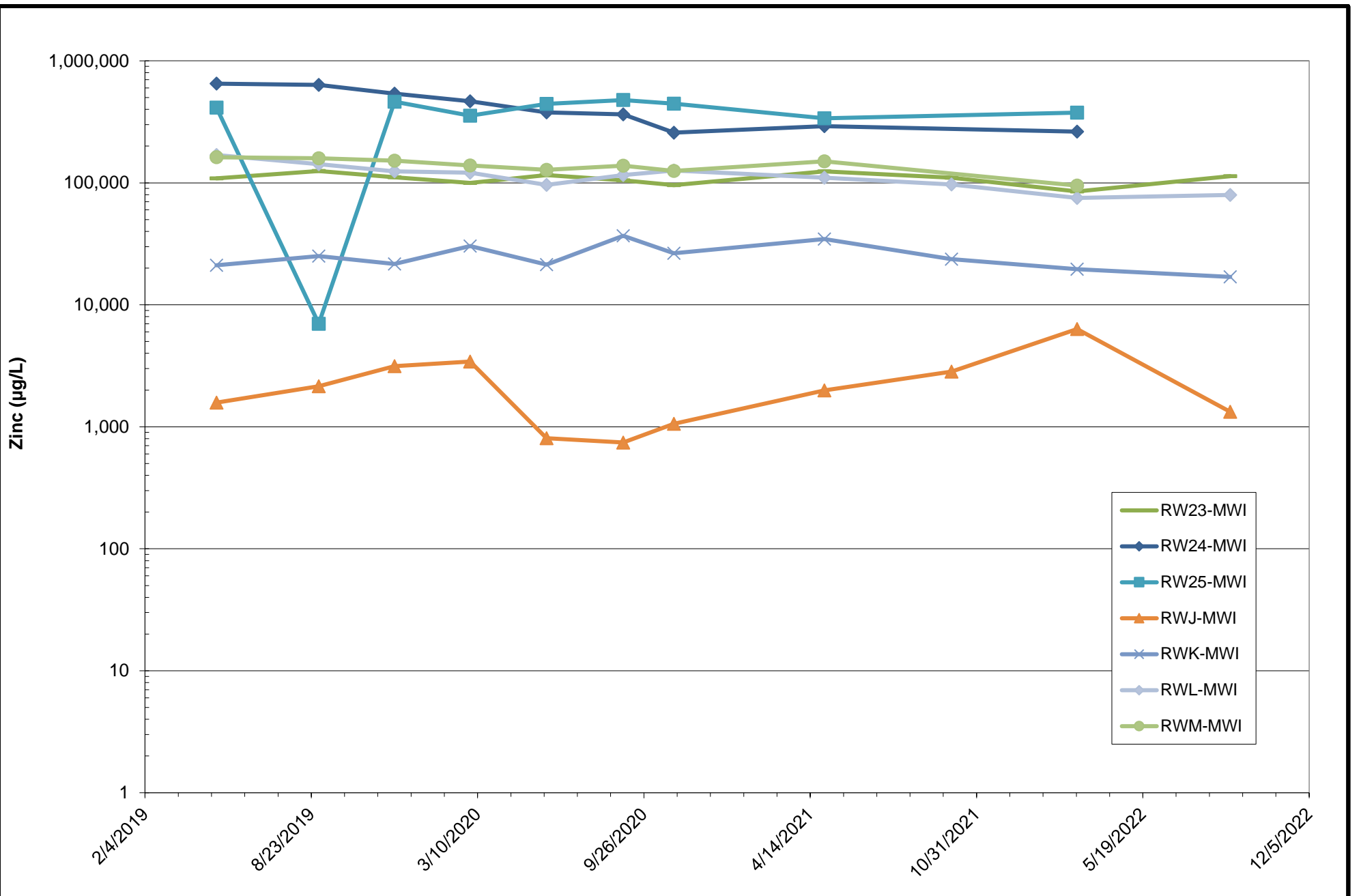
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

Intermediate Interior Zinc  
Concentrations (Original Wells)

February 2023

**Figure  
30**



**ARM Group LLC**  
Engineers and Scientists

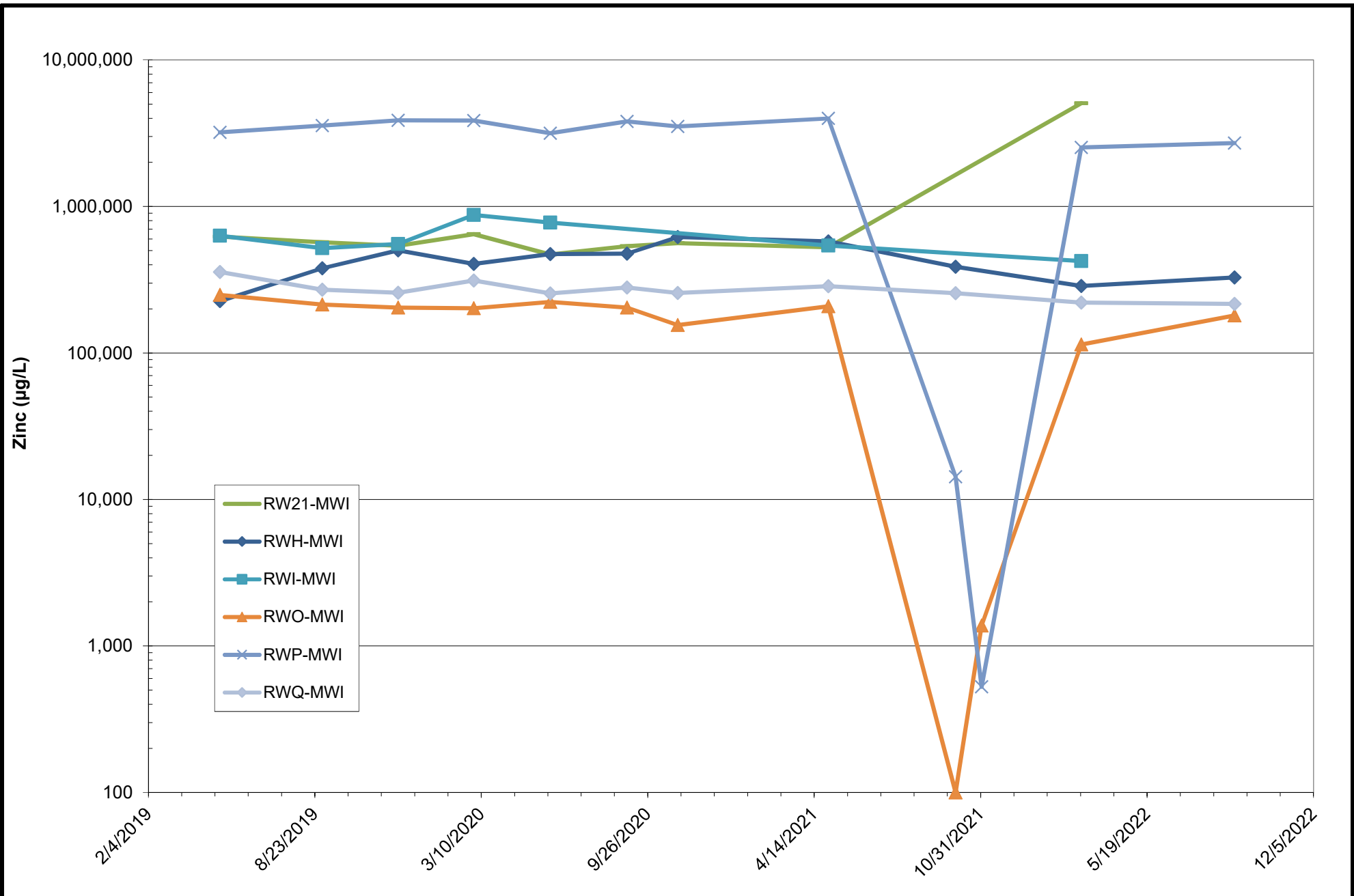
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

Intermediate Interior Zinc  
Concentrations (Supplemental Wells)

February 2023

**Figure  
31**



**ARM Group LLC**  
Engineers and Scientists

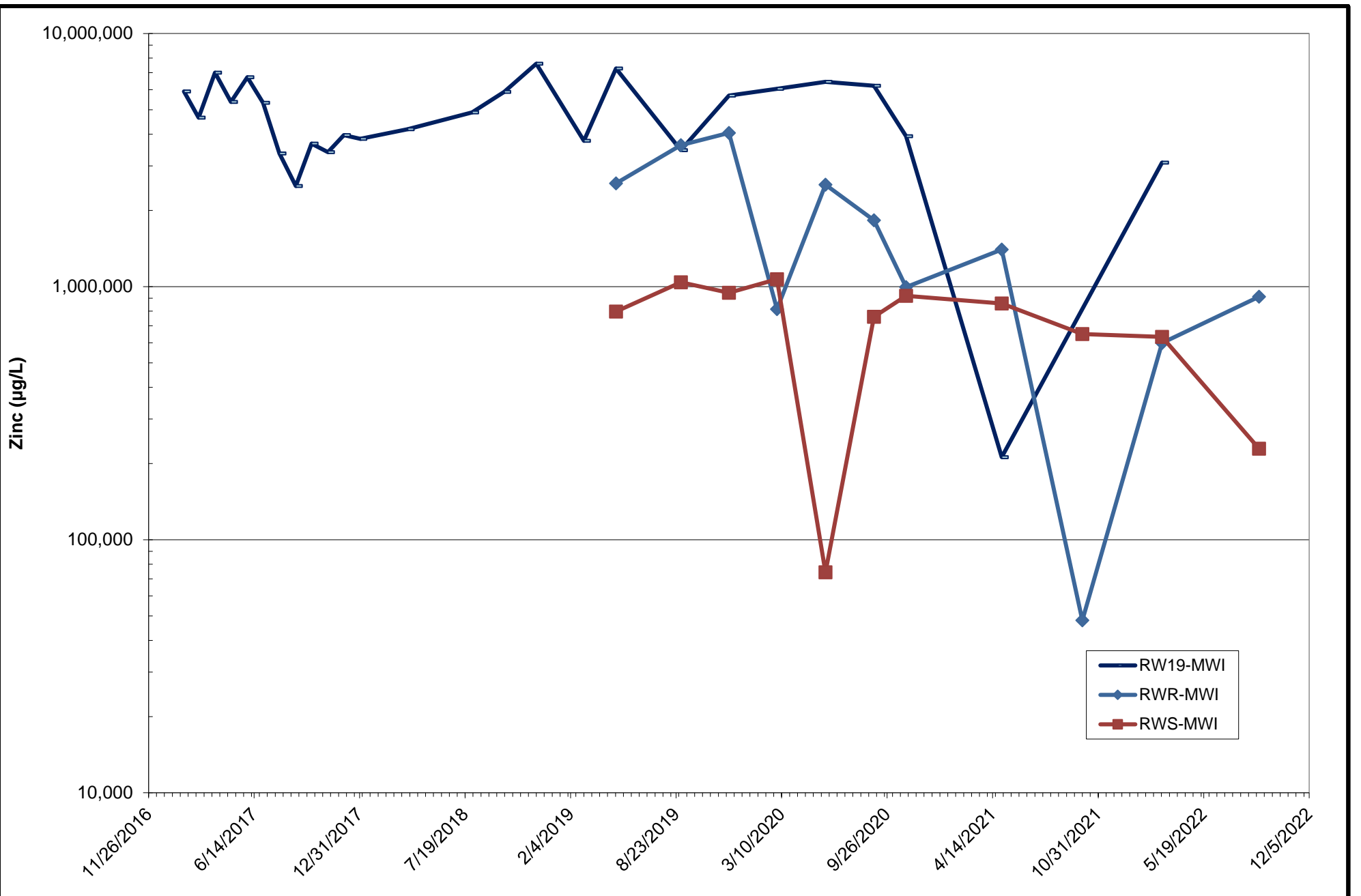
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

**Intermediate Delineation Wells  
Zinc Concentrations**

February 2023

**Figure  
32**



**ARM Group LLC**  
Engineers and Scientists

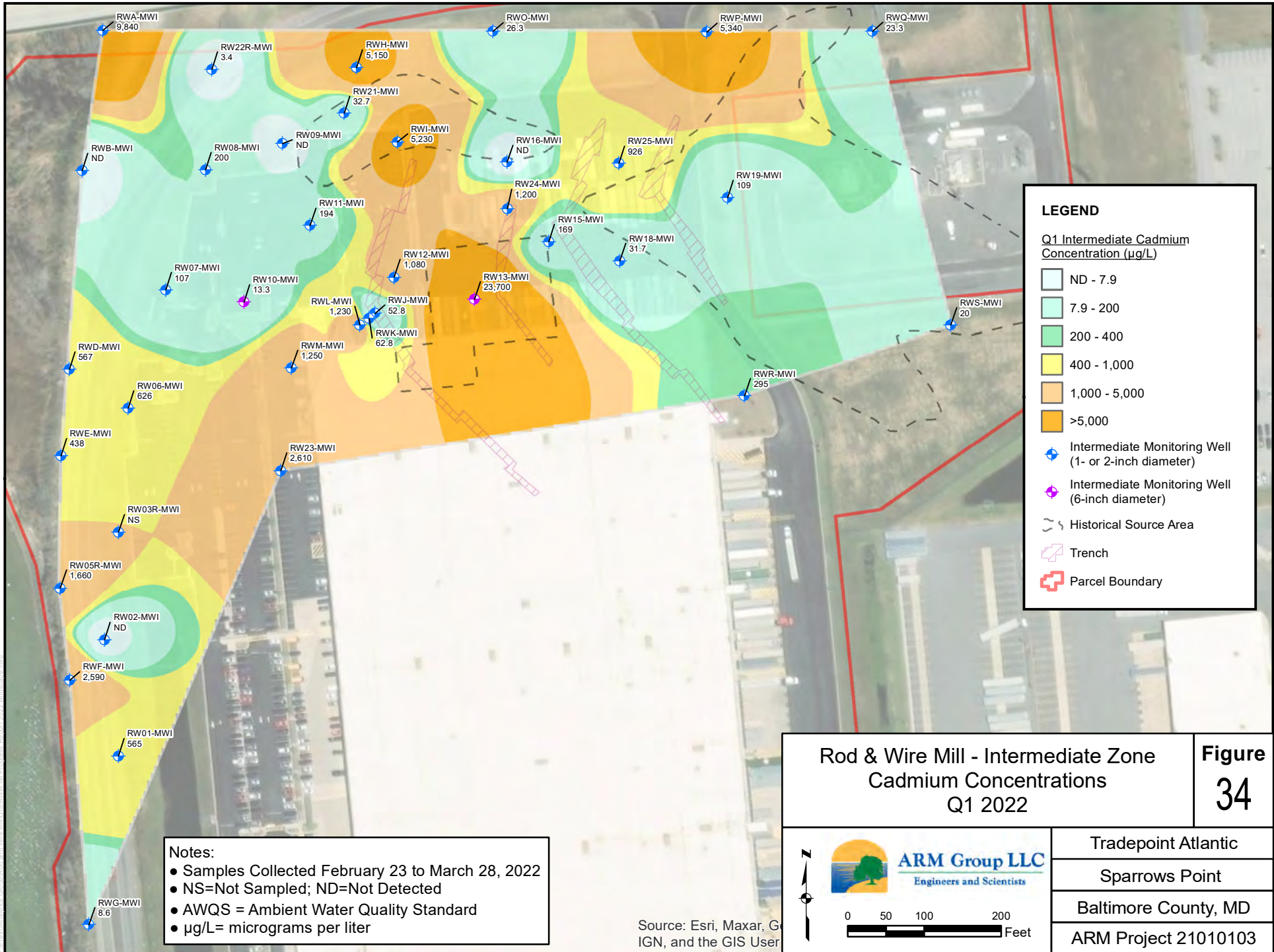
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

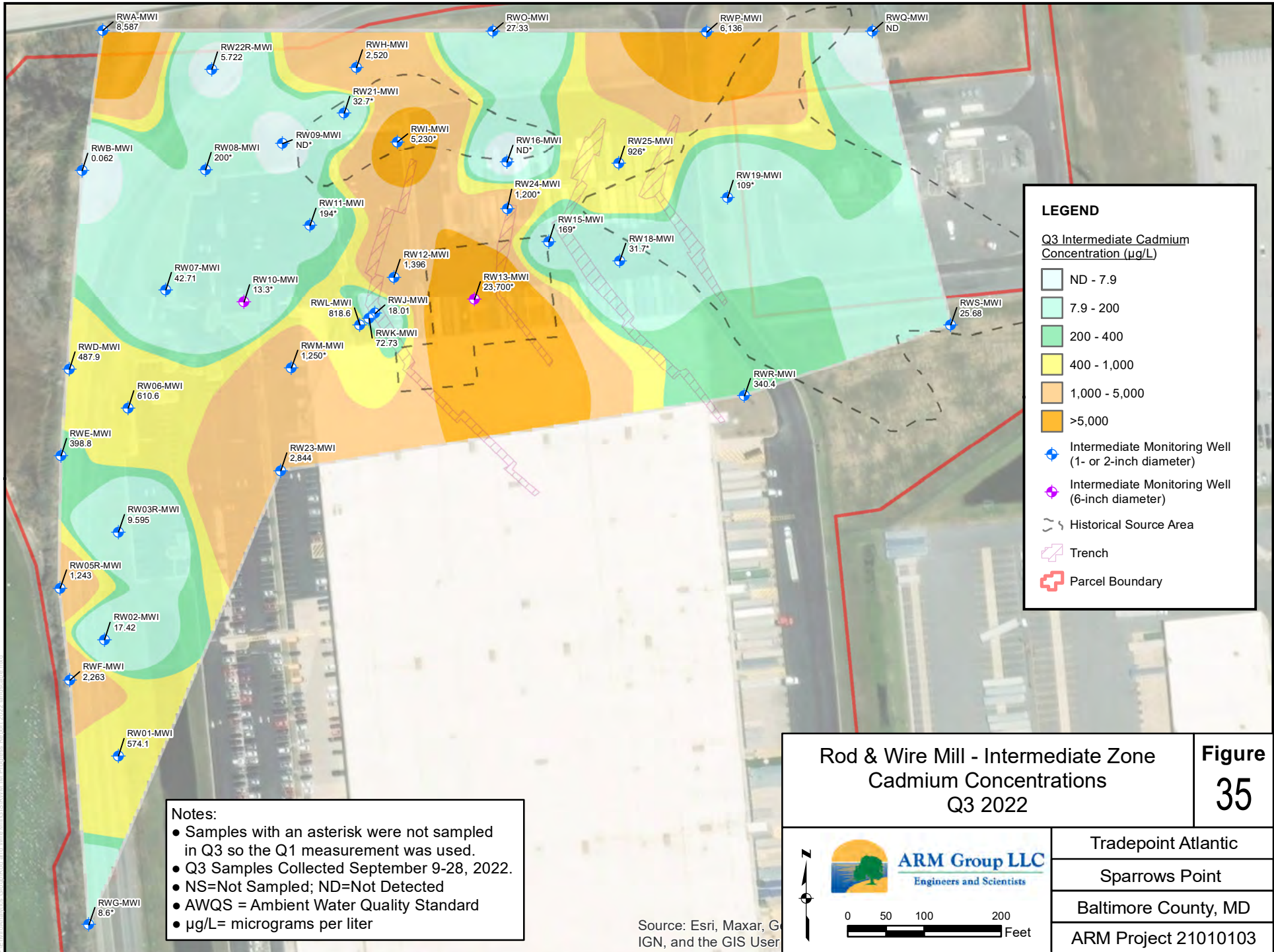
### Intermediate Upgradient Zinc Concentrations

February 2023

**Figure  
33**



Well ID	Concentration (µg/L)	Well Type
RWA-MWI	9,840	1- or 2-inch diameter
RW22R-MWI	3.4	1- or 2-inch diameter
RWH-MWI	5,150	1- or 2-inch diameter
RWO-MWI	26.3	1- or 2-inch diameter
RWP-MWI	5,340	1- or 2-inch diameter
RWQ-MWI	23.3	1- or 2-inch diameter
RWB-MWI	ND	1- or 2-inch diameter
RW08-MWI	200	1- or 2-inch diameter
RW09-MWI	ND	1- or 2-inch diameter
RW21-MWI	32.7	1- or 2-inch diameter
RWI-MWI	5,230	1- or 2-inch diameter
RW16-MWI	ND	1- or 2-inch diameter
RW25-MWI	926	1- or 2-inch diameter
RW19-MWI	109	1- or 2-inch diameter
RW11-MWI	194	1- or 2-inch diameter
RW24-MWI	1,200	1- or 2-inch diameter
RW15-MWI	169	1- or 2-inch diameter
RW18-MWI	31.7	1- or 2-inch diameter
RW07-MWI	107	1- or 2-inch diameter
RW10-MWI	13.3	6-inch diameter
RWL-MWI	1,230	1- or 2-inch diameter
RWJ-MWI	52.8	1- or 2-inch diameter
RW13-MWI	23,700	6-inch diameter
RWK-MWI	62.8	1- or 2-inch diameter
RWS-MWI	20	1- or 2-inch diameter
RWD-MWI	567	1- or 2-inch diameter
RWM-MWI	1,250	1- or 2-inch diameter
RWR-MWI	295	1- or 2-inch diameter
RW06-MWI	626	1- or 2-inch diameter
RWE-MWI	438	1- or 2-inch diameter
RW03R-MWI	NS	1- or 2-inch diameter
RW05R-MWI	1,660	1- or 2-inch diameter
RW02-MWI	ND	1- or 2-inch diameter
RWF-MWI	2,590	1- or 2-inch diameter
RW01-MWI	565	1- or 2-inch diameter
RWG-MWI	8.6	1- or 2-inch diameter
RW23-MWI	2,610	1- or 2-inch diameter



**LEGEND**

Q3 Intermediate Cadmium Concentration (µg/L)

- ND - 7.9
- 7.9 - 200
- 200 - 400
- 400 - 1,000
- 1,000 - 5,000
- >5,000

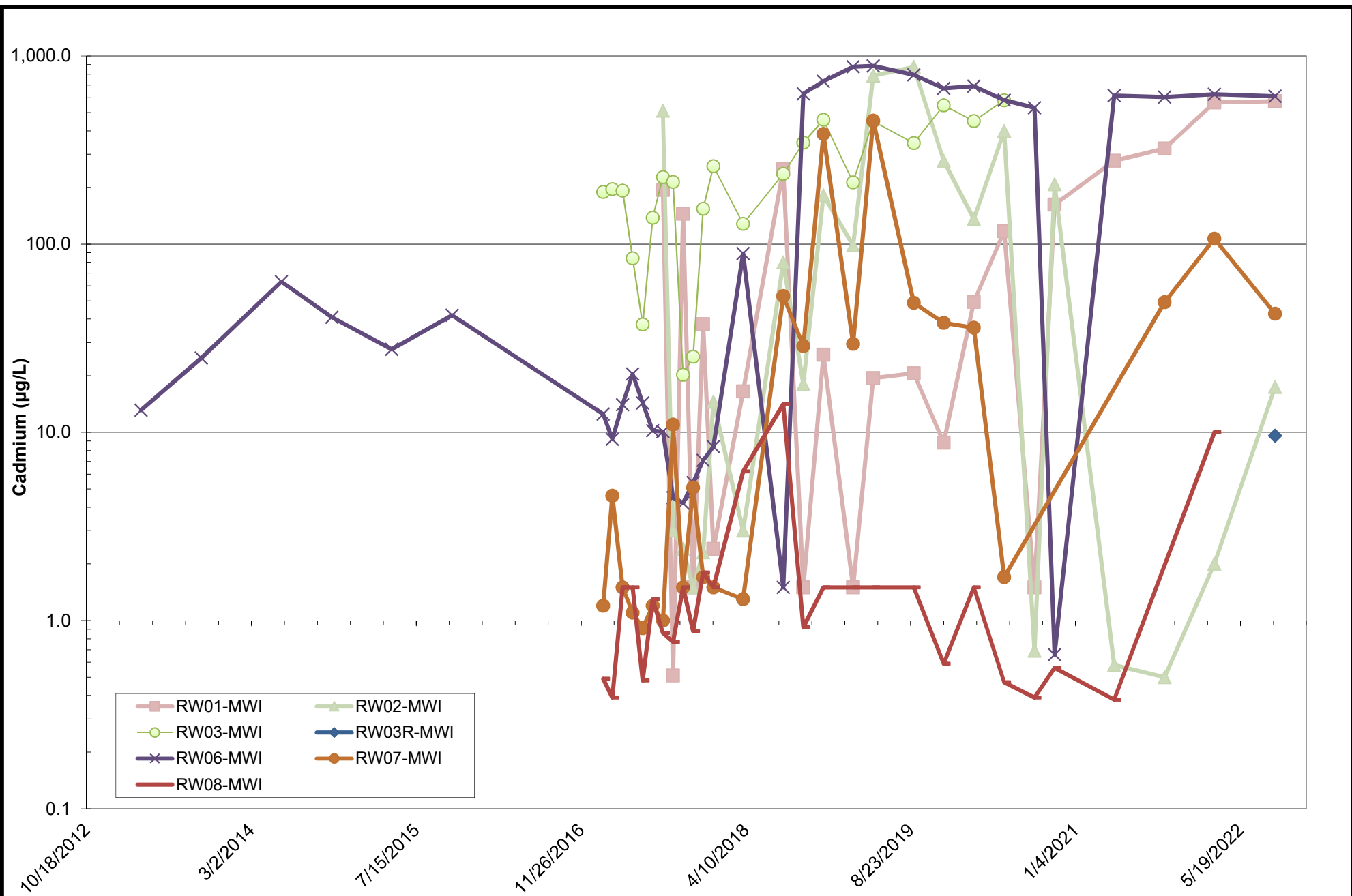
- ◆ Intermediate Monitoring Well (1- or 2-inch diameter)
- ◆ Intermediate Monitoring Well (6-inch diameter)
- - - Historical Source Area
- ▭ Trench
- ▭ Parcel Boundary

**Notes:**

- Samples with an asterisk were not sampled in Q3 so the Q1 measurement was used.
- Q3 Samples Collected September 9-28, 2022.
- NS=Not Sampled; ND=Not Detected
- AWQS = Ambient Water Quality Standard
- µg/L= micrograms per liter

<b>Rod &amp; Wire Mill - Intermediate Zone Cadmium Concentrations Q3 2022</b>		<b>Figure 35</b>
<b>ARM Group LLC</b> Engineers and Scientists		Tradepoint Atlantic Sparrows Point Baltimore County, MD ARM Project 21010103

Source: Esri, Maxar, G  
IGN, and the GIS User



**ARM Group LLC**  
Engineers and Scientists

Rod and Wire Mill  
Tradeport Atlantic

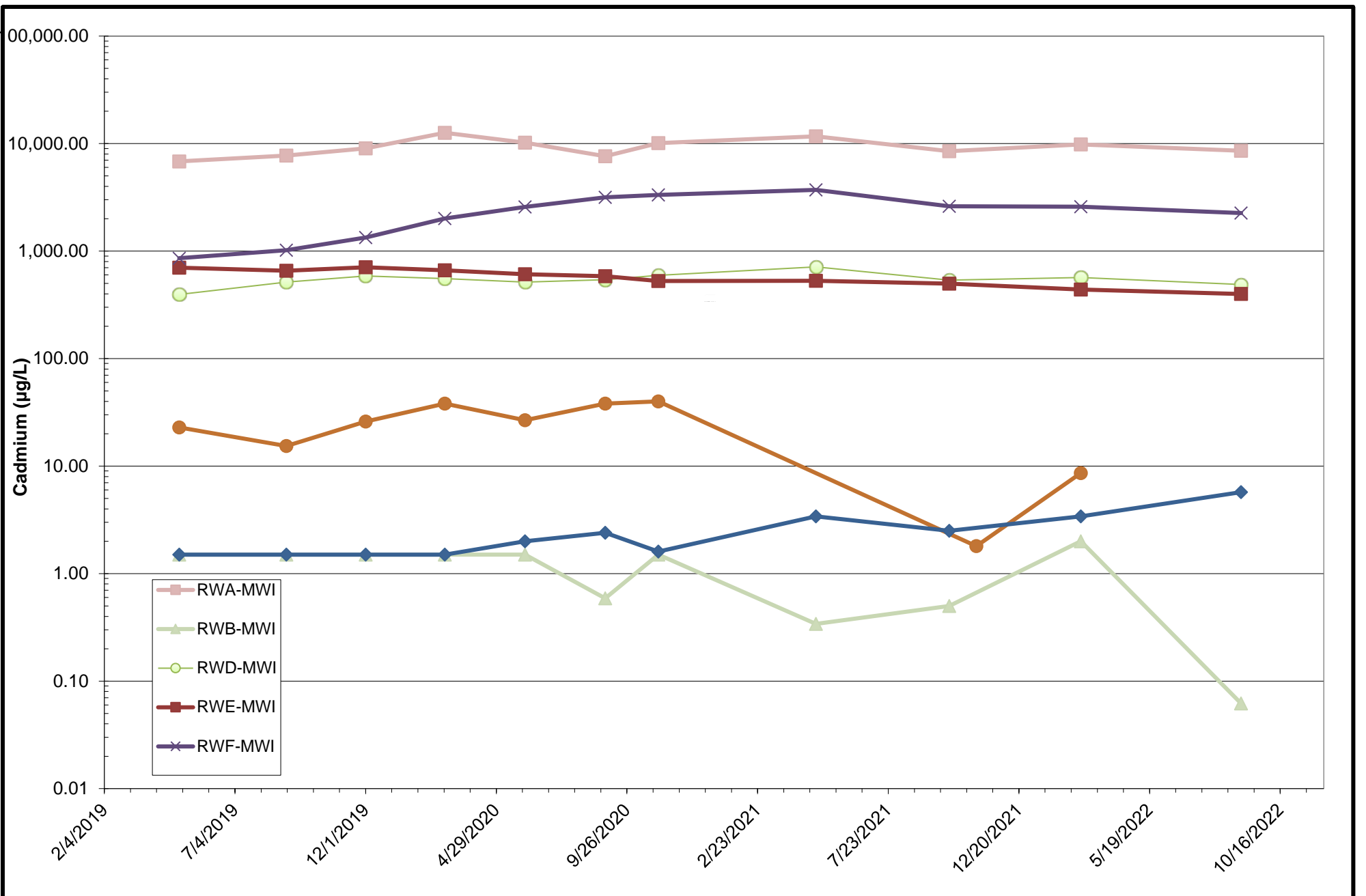
Sparrows Point, Maryland

**Intermediate Perimeter Cadmium  
Concentrations (Original Wells)**

February 2023

**Figure  
36**





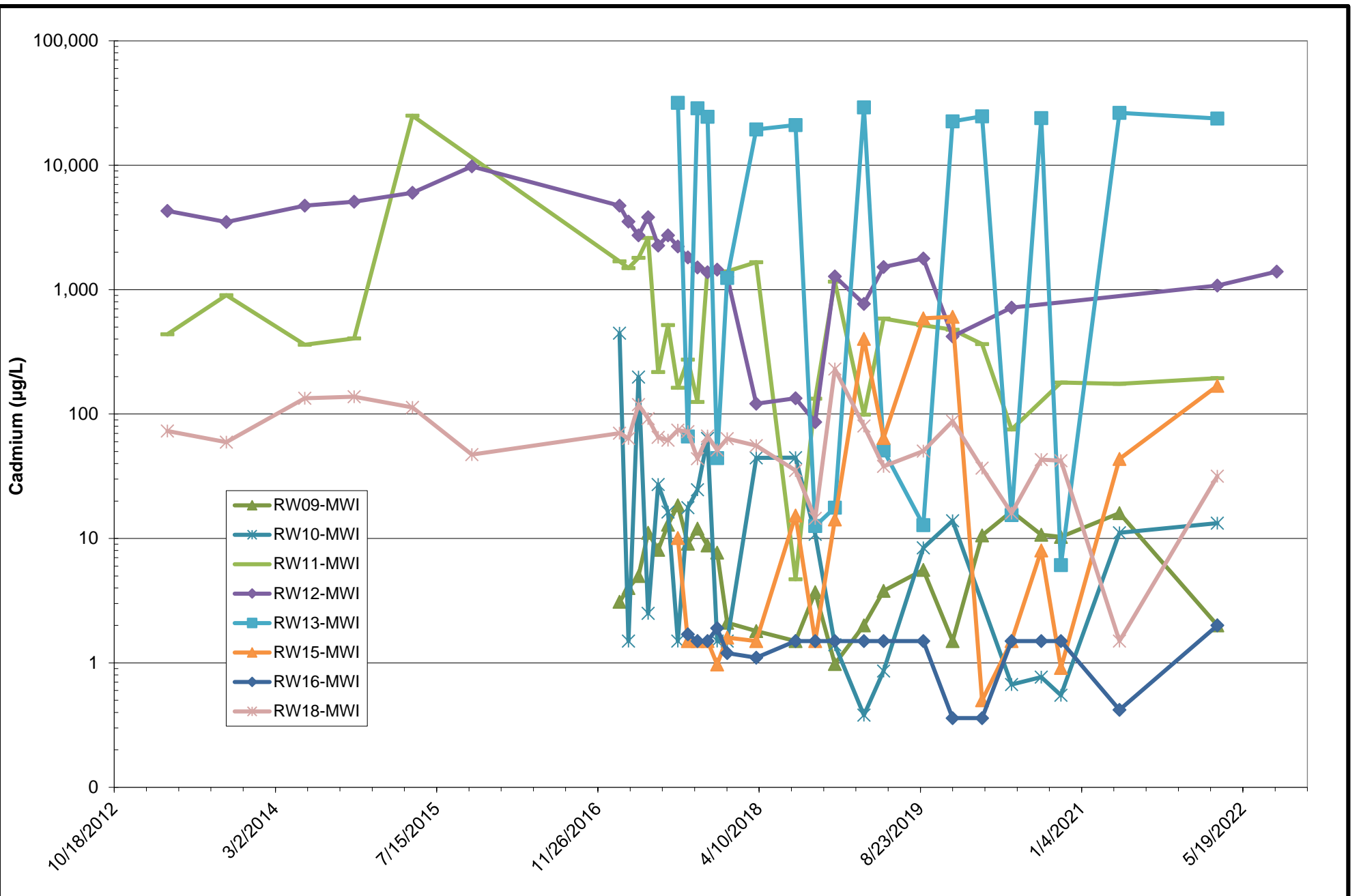
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

### Intermediate Perimeter Cadmium Concentrations (Supplemental Wells)

February 2023

**Figure  
37**



**ARM Group LLC**  
Engineers and Scientists

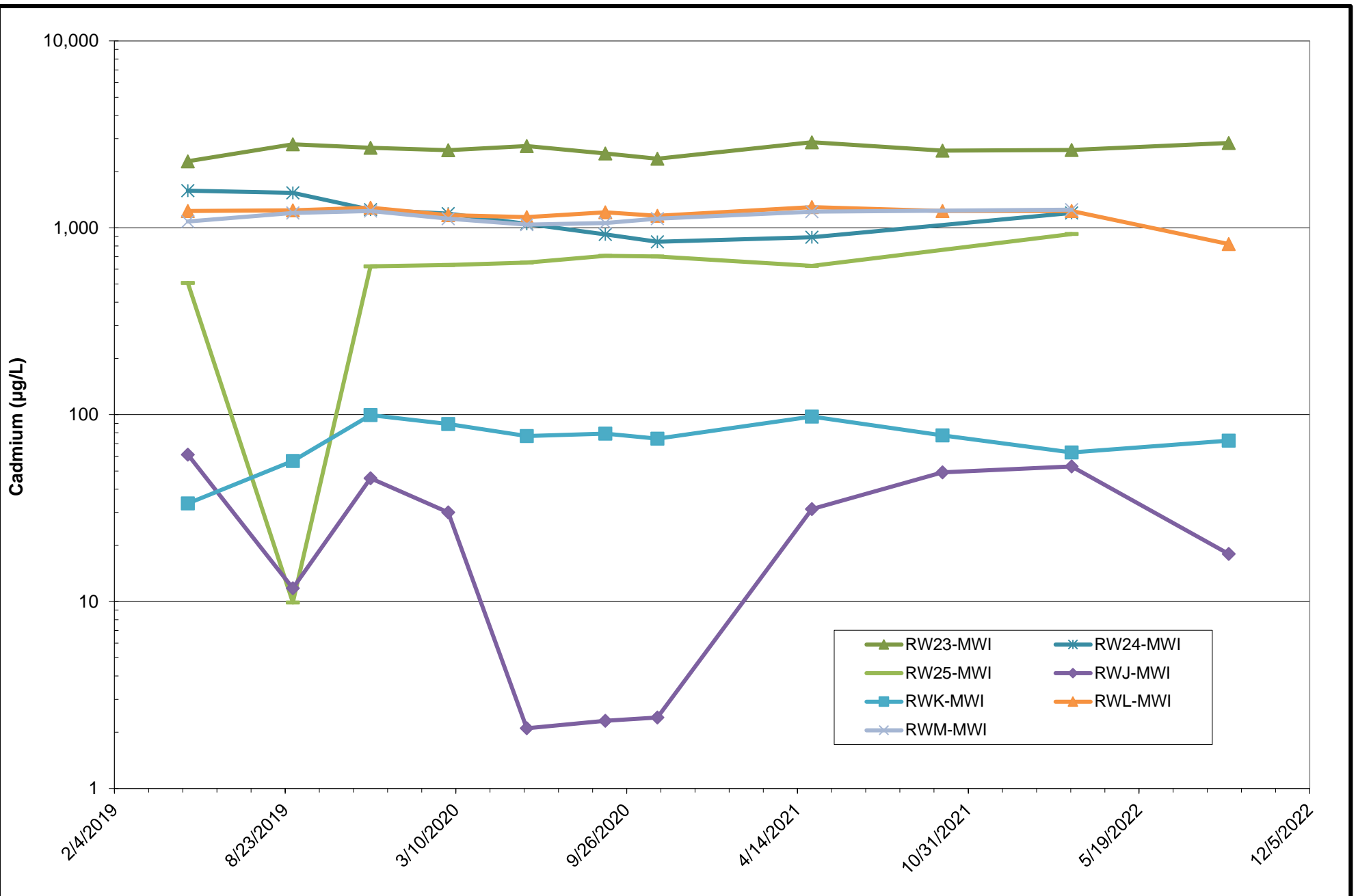
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

Intermediate Interior Cadmium  
Concentrations (Original Wells)

February 2023

**Figure  
38**



**ARM Group LLC**  
Engineers and Scientists

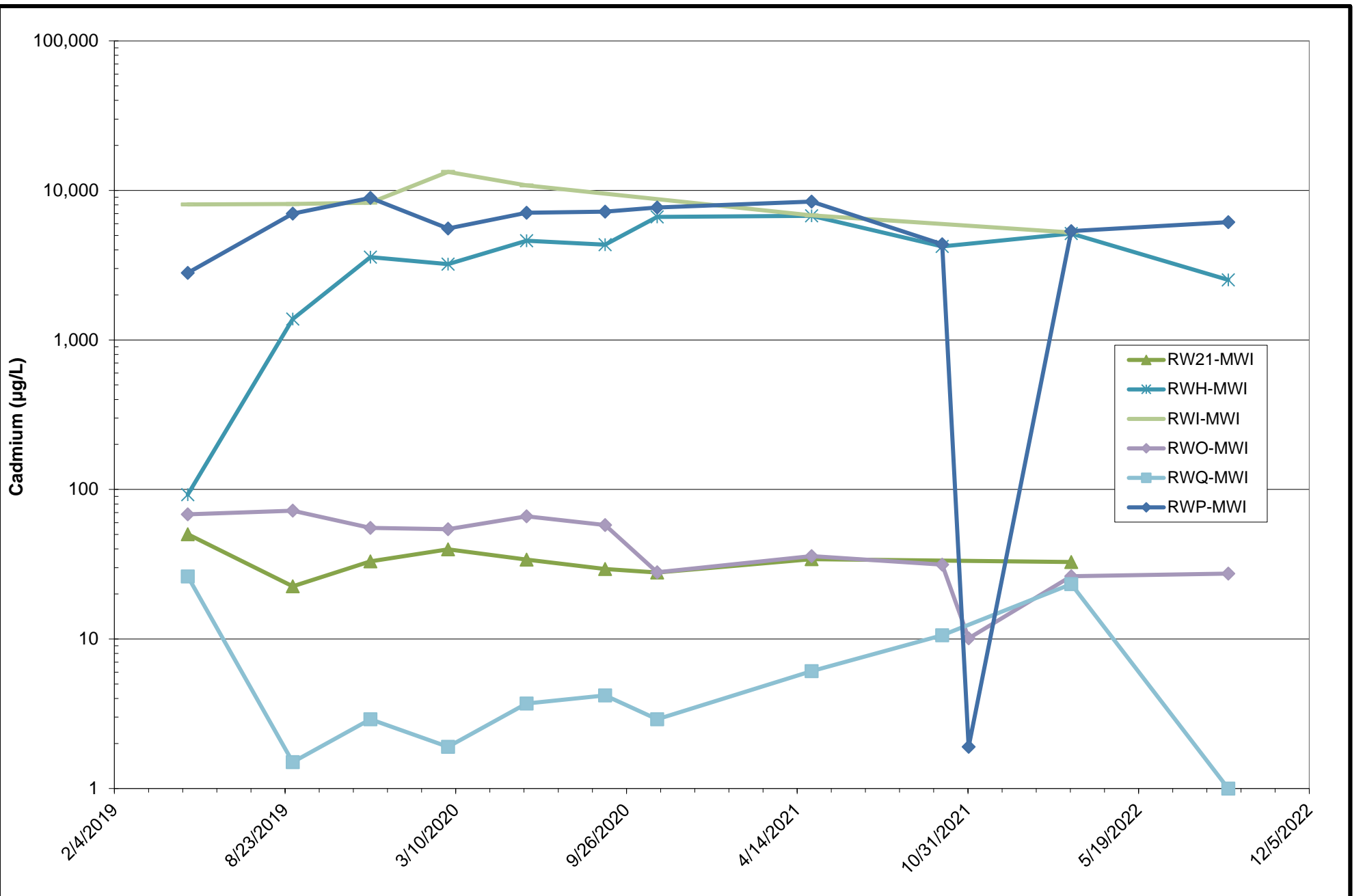
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

**Intermediate Interior Cadmium  
Concentrations (Supplemental Wells)**

February 2023

**Figure  
39**



**ARM Group LLC**  
Engineers and Scientists

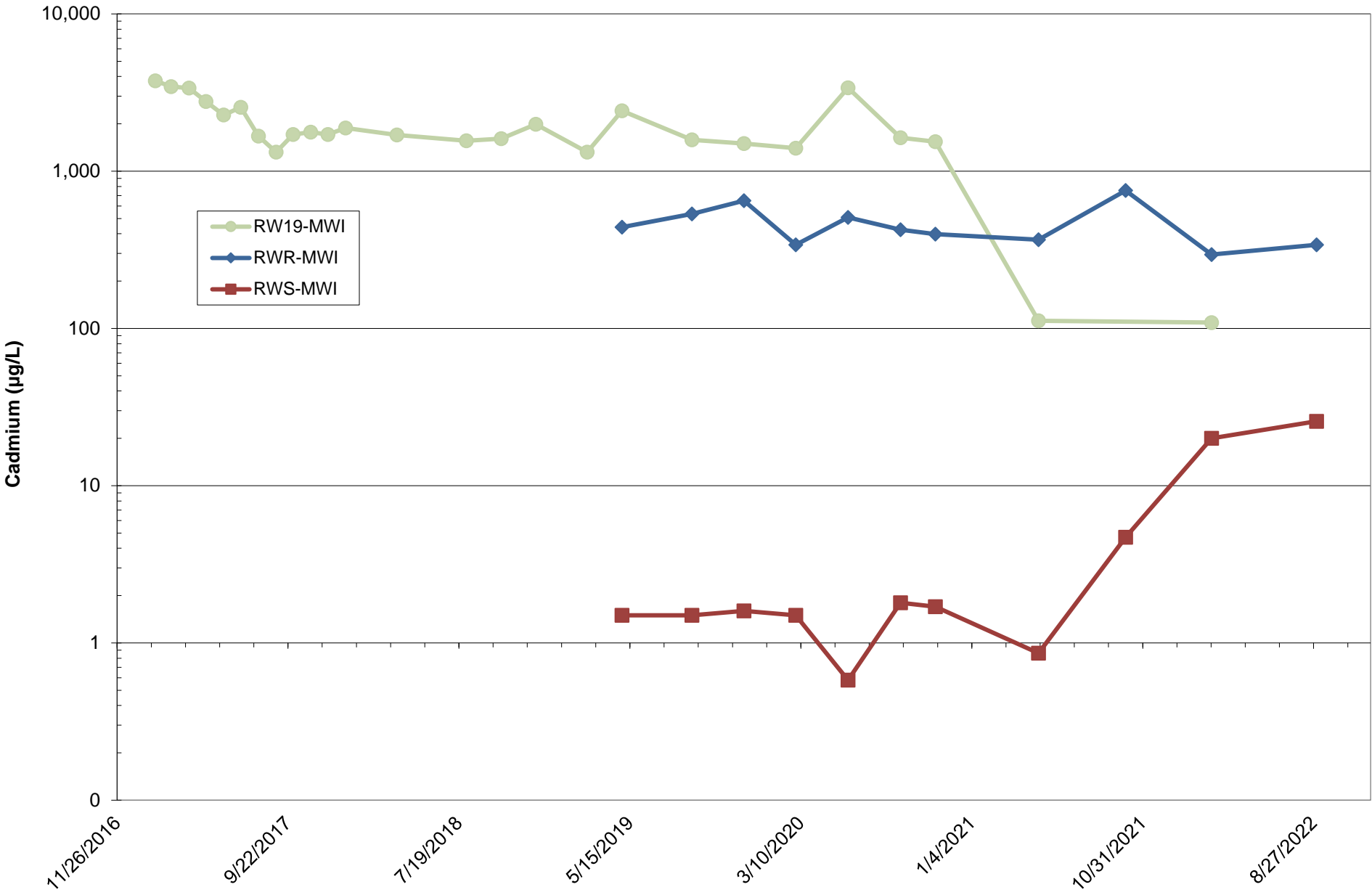
Rod and Wire Mill  
Tradeport Atlantic

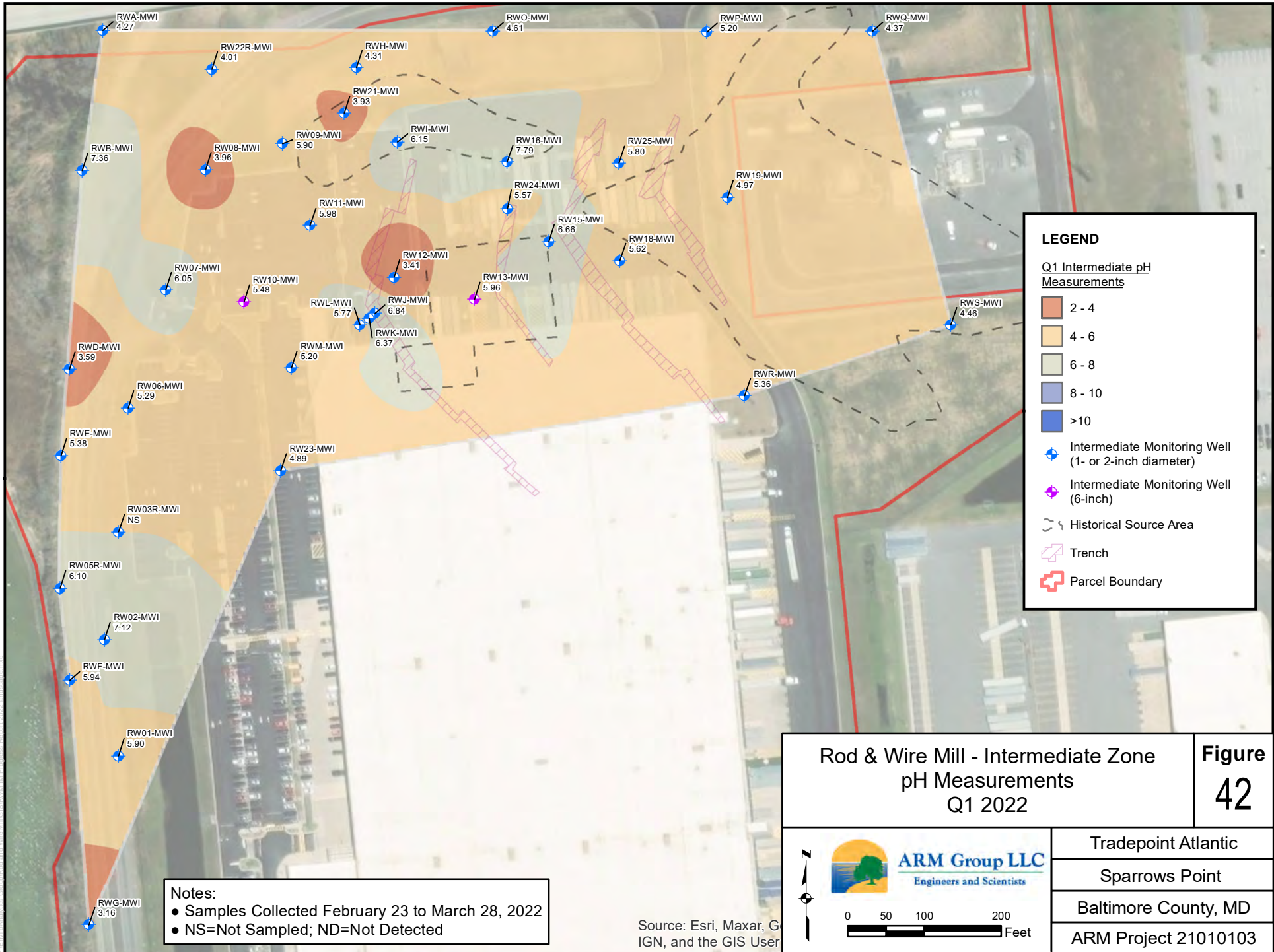
Sparrows Point, Maryland

**Intermediate Delineation Wells  
Cadmium Concentrations**

February 2023

**Figure  
40**





**LEGEND**

**Q1 Intermediate pH Measurements**

- 2 - 4
- 4 - 6
- 6 - 8
- 8 - 10
- >10

- Intermediate Monitoring Well (1- or 2-inch diameter)
- Intermediate Monitoring Well (6-inch)
- Historical Source Area
- Trench
- Parcel Boundary

**Figure 42**

Tradepoint Atlantic

Sparrows Point

Baltimore County, MD

ARM Project 21010103

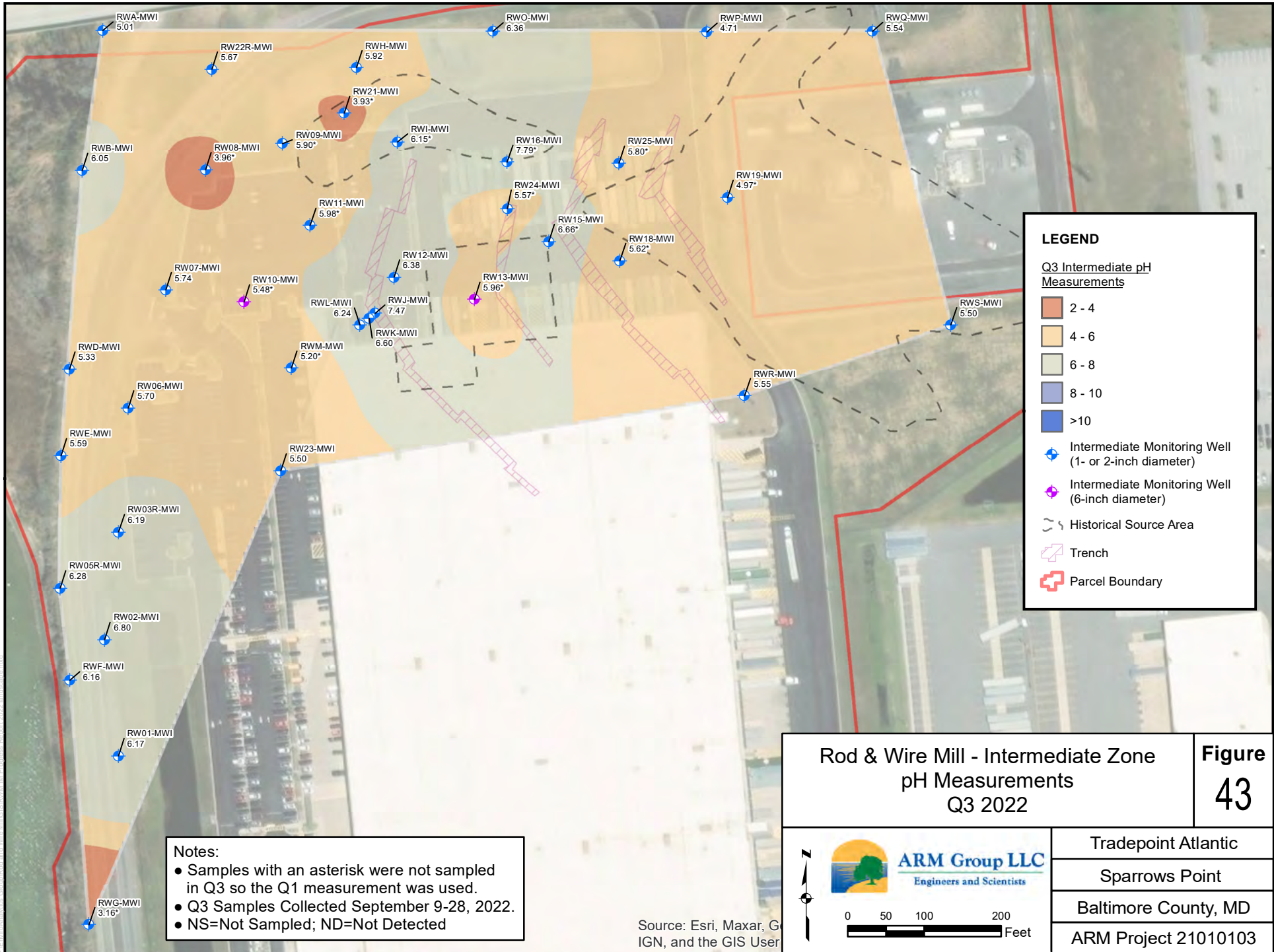
**Notes:**

- Samples Collected February 23 to March 28, 2022
- NS=Not Sampled; ND=Not Detected

Source: Esri, Maxar, IGN, and the GIS User

ARM Group LLC  
Engineers and Scientists

0 50 100 200 Feet



**LEGEND**

**Q3 Intermediate pH Measurements**

- 2 - 4
- 4 - 6
- 6 - 8
- 8 - 10
- >10

- Intermediate Monitoring Well (1- or 2-inch diameter)
- Intermediate Monitoring Well (6-inch diameter)
- Historical Source Area
- Trench
- Parcel Boundary

**Notes:**

- Samples with an asterisk were not sampled in Q3 so the Q1 measurement was used.
- Q3 Samples Collected September 9-28, 2022.
- NS=Not Sampled; ND=Not Detected

Rod & Wire Mill - Intermediate Zone  
pH Measurements  
Q3 2022

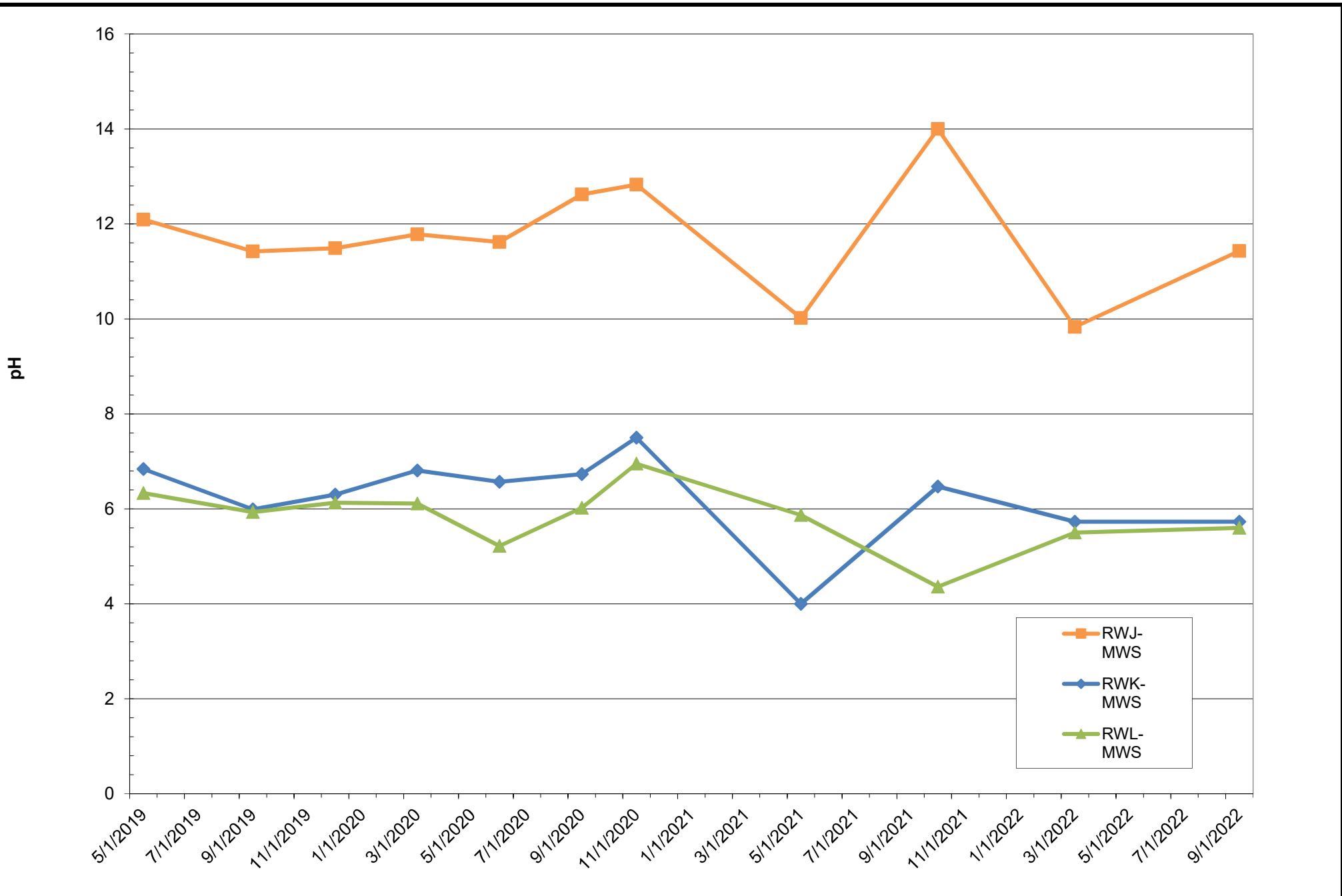
**Figure**  
**43**

ARM Group LLC  
Engineers and Scientists

0 50 100 200 Feet

Tradepoint Atlantic  
Sparrows Point  
Baltimore County, MD  
ARM Project 21010103

Source: Esri, Maxar, IGN, and the GIS User



**ARM Group LLC**  
Engineers and Scientists

Rod and Wire Mill  
Tradeport Atlantic

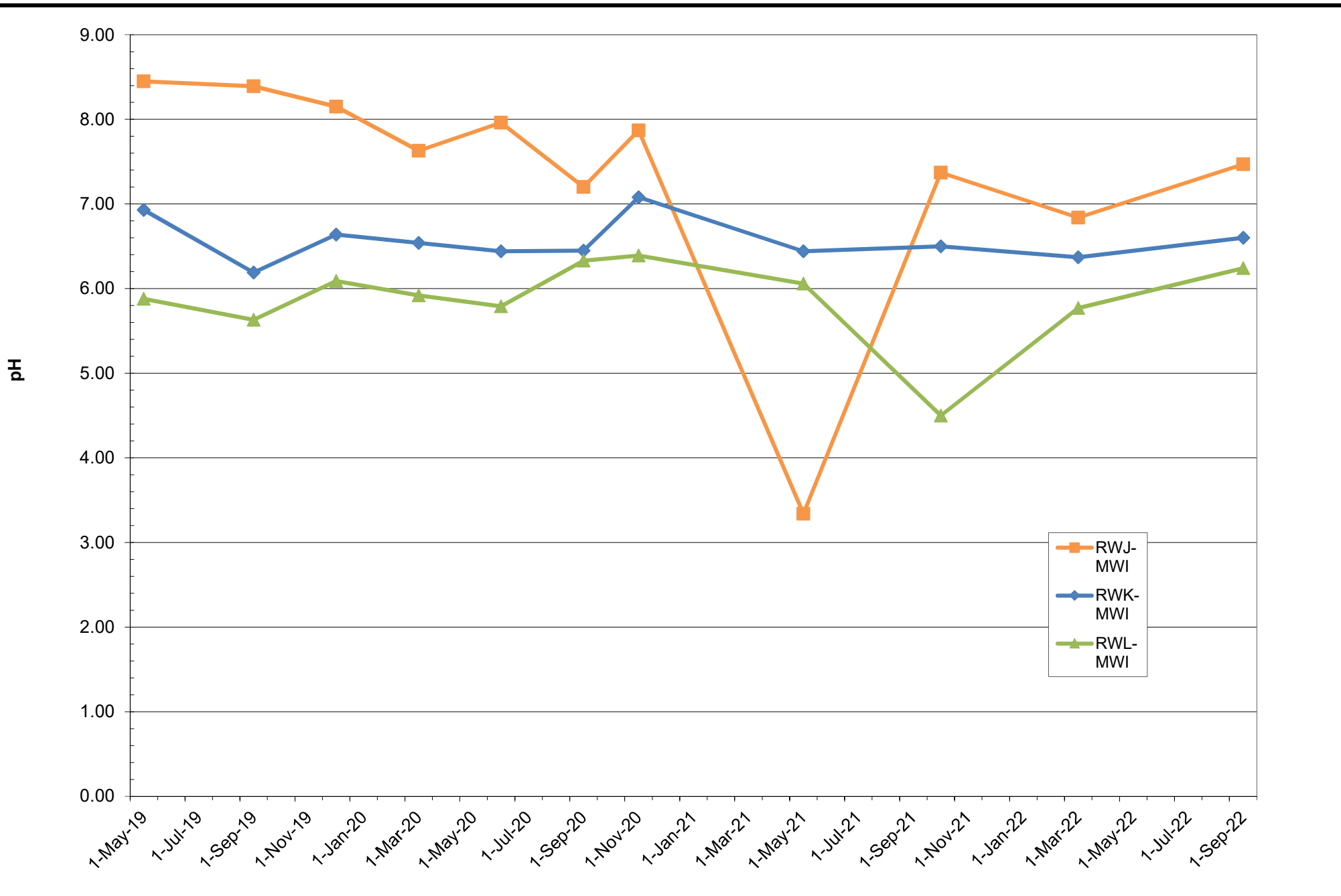
Sparrows Point, Maryland

**RWJ-MWS, RWK-MWS, RWL-MWS  
pH Measurements**

February 2023

**Figure  
44**





**ARM Group LLC**  
Engineers and Scientists

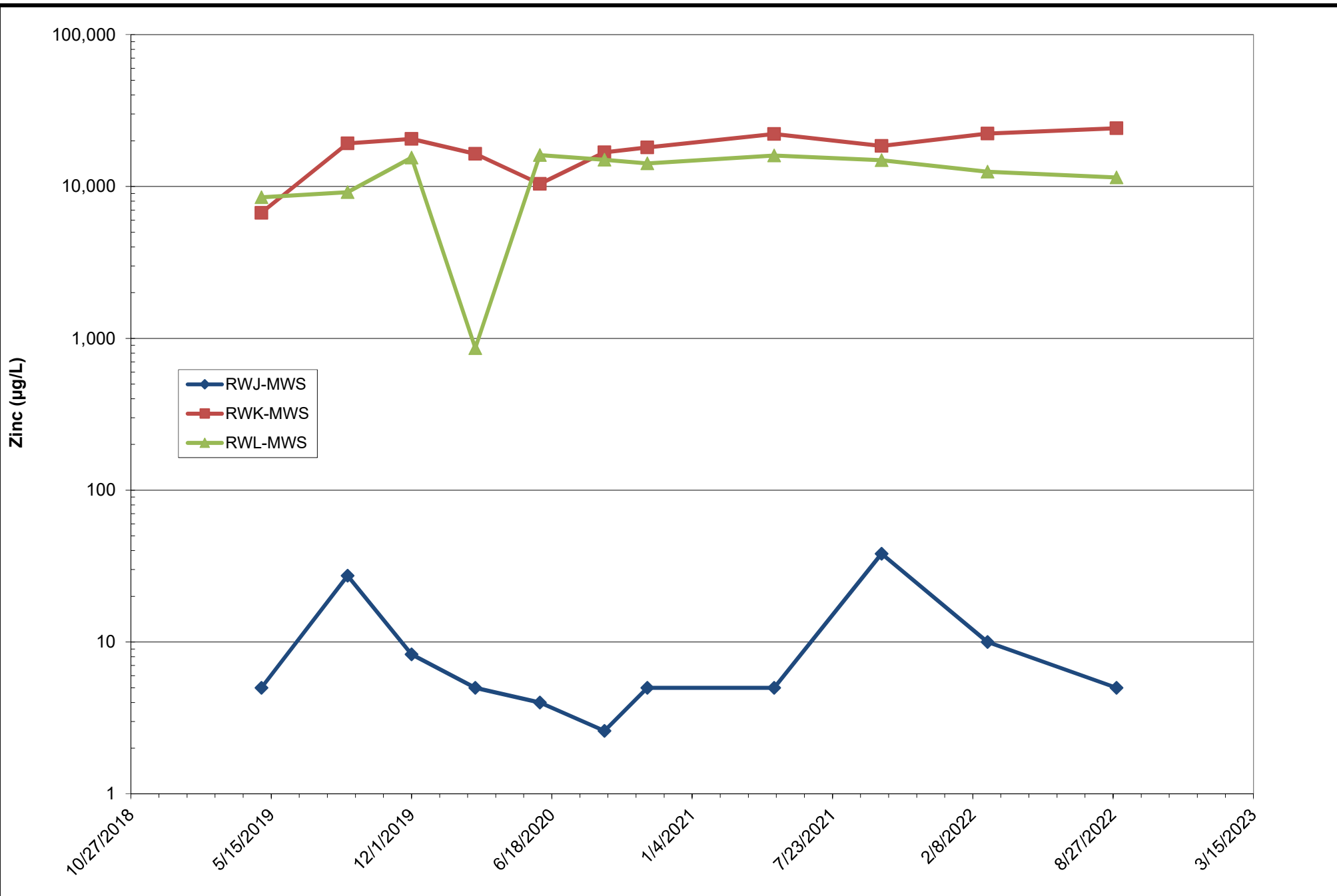
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

**RWJ-MWI, RWK-MWI, and RWL-MWI  
pH Measurements**

February 2023

**Figure  
45**



**ARM Group LLC**  
Engineers and Scientists

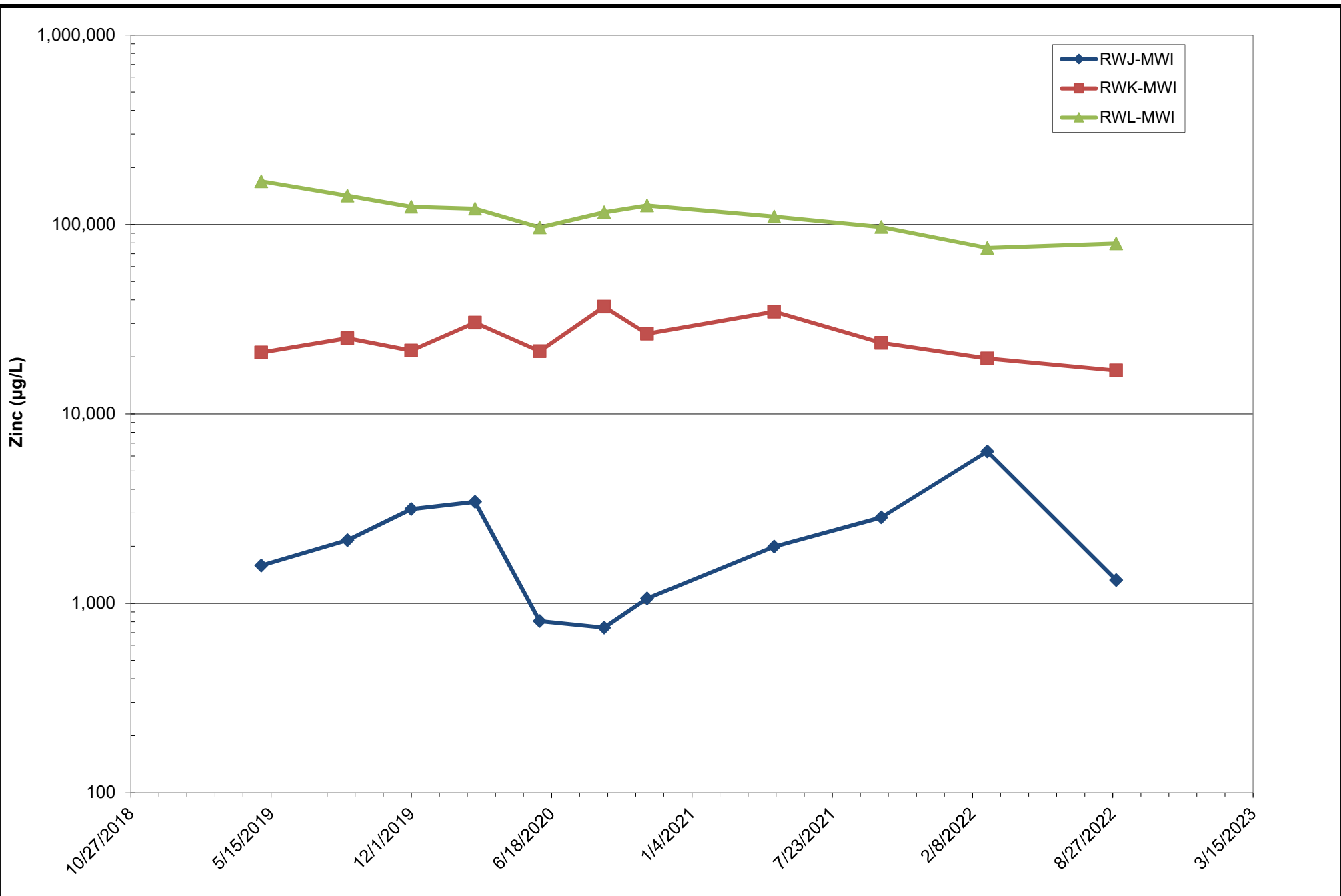
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

**RWJ-MWS, RWK-MWS, and RWL-MWS  
Zinc Concentrations**

February 2023

**Figure  
46**



**ARM Group LLC**  
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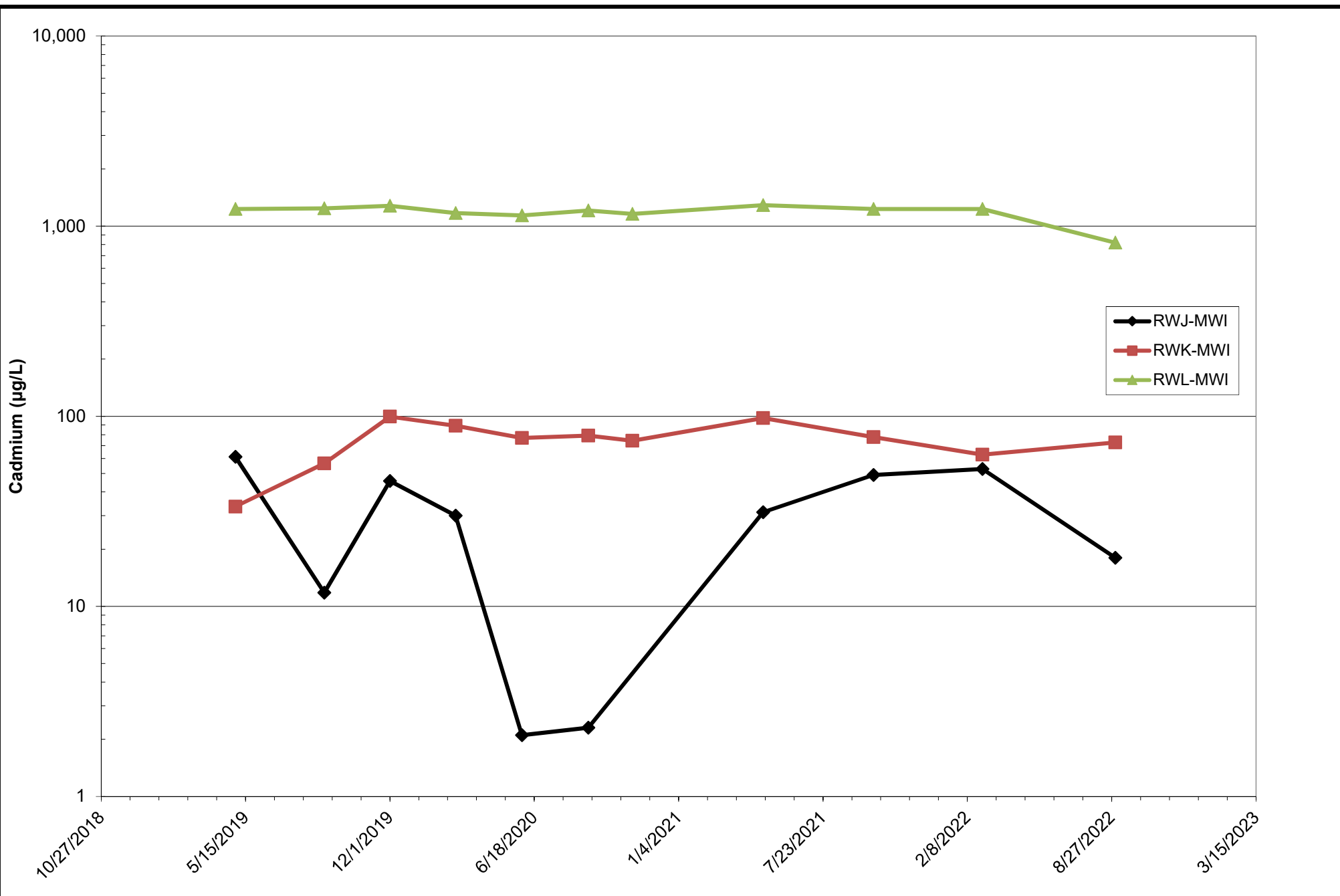
Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

**RWJ-MWI, RWK-MWI, and RWL-MWI  
Zinc Concentrations**

February 2023

**Figure  
47**



**ARM Group LLC**  
Engineers and Scientists

Rod and Wire Mill  
Tradeport Atlantic

Sparrows Point, Maryland

**RWJ-MWI, RWK-MWI, and RWL-MWI  
Cadmium Concentrations**

February 2023

**Figure  
48**

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## **TABLES**

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**TABLE 1**  
**Monitoring Well Construction Summary**  
**Rod Wire Mill Interim Measure Progress Report**

Well Name	Monitoring Area	Installation Date	Abandonment Date	Northing	Easting	Surface Completion	TOC Elevation (ft AMSL)	Ground Surface Elevation (ft AMSL)	Total Well Depth (feet)	Screen Length (feet)	Well Diameter (inch)
RW01-MWI	Intermediate	8/1/2017	4/25/2023	571513.6572	1455952.772	Flush Mount	9.78	10.21	41	10	2
RW01-MWS	Shallow	7/28/2017	4/25/2023	571518.9458	1455952.268	Flush Mount	9.71	10.18	20	10	2
RW02-MWI	Intermediate	7/31/2017	4/25/2023	571665.1462	1455934.83	Flush Mount	9.86	10.12	36.5	10	2
RW02-MWS	Shallow	7/27/2017	4/25/2023	571670.4206	1455934.956	Flush Mount	10.01	10.18	18	10	2
RW03-MWI	Intermediate	12/9/2016	Destroyed	571819.168	1455955.53		13.35	10.15	40	10	2
RW03-MWS	Shallow	12/9/2016	Destroyed	571824.033	1455955.781		13.92	10.08	20	10	2
RW03R-MWI	Shallow	5/3/2022		571809.753	1455953.368	Stick-up Steel Casing	13.8	11.63	20	8	2
RW03R-MWS	Intermediate	5/3/2022		571805.64	1455953.193	Stick-up Steel Casing	13.78	11.52	40	10	2
RW04-MWS	Shallow	8/11/2000		571781.312	1456010.849	Flush Mount	8.89	9.2	15	unknown	2
RW05-MWS	Shallow	7/11/2017		571709.0224	1455888.533	Flush Mount	9.73	10.08	17	10	2
RW05R-MWI	Intermediate	4/23/2019		571732.443	1455877.003	Stick-up Steel Casing	12.95	10.56	40	10	1
RW06R-MWD	Deep	5/1/2018		571962.528	1455966.189	Flush mount	11.84	12.07	62	10	2
RW06R-MWS	Shallow	4/30/2018		571966.8512	1455965.706	Flush mount	11.44	11.95	10	5	2
RW06-MWI	Intermediate	4/30/1986	4/25/2023	571975.244	1455960.618	Flush mount	11.32	11.78	30		2
RW07-MWI	Intermediate	12/14/2016		572120.736	1456014.511	Flush mount	12.87	13.16	40	10	2
RW07-MWS	Shallow	12/14/2016		572124.671	1456015.618	Flush mount	13.01	13.31	20	10	2
RW08-MWI	Intermediate	12/13/2016		572277.419	1456066.32	Flush mount	12.27	12.71	40	10	2
RW08-MWS	Shallow	12/13/2016		572281.232	1456068.357	Flush mount	12.32	12.47	20	10	2
RW09-MWI	Intermediate	12/15/2016		572311.301	1456166.668	Flush mount	12.75	12.95	40	10	2
RW09-MWS	Shallow	12/16/2016		572317.199	1456164.575	flush mount	12.81	13.07	20	10	2
RW10-MWI	Intermediate	12/22/2016		572105.166	1456116.254	Vault	13.44	NM	40	10	6
RW11-MWI	Intermediate	8/30/2001		572204.529	1456202.556	Flush mount	12.34	12.64	30	unknown	2
RW11-MWS	Shallow	12/19/2016		572210.58	1456202.673	Flush mount	12.16	12.63	20	10	2
RW12-MWI	Intermediate	9/12/1985		572137.284	1456311.813	Flush mount	13.43	13.6	30	unknown	2
RW12-MWS	Shallow	8/28/2001		572145.256	1456308.732	Flush mount	13.15	13.5	14	unknown	2
RW13-MWI	Intermediate	7/21/2017		572108.388	1456416.357	Vault	13.69	14.51	38	10	6
RW14-MWS	Shallow	7/27/2017		572172.661	1456421.302	Flush mount	12.64	13.13	20.5	10	2
RW15-MWI	Intermediate	7/24/2017		572183.9168	1456513.584	Flush mount	13.33	13.58	36.5	10	2
RW15-MWS	Shallow	7/21/2017		572189.6508	1456512.039	Flush mount	13.22	13.52	18.3	10	2
RW16-MWI	Intermediate	8/22/2017		572286.93	1456459.18	Flush mount	12.18	12.38	40	10	2
RW16-MWS	Shallow	8/22/2017		572294.99	1456460.62	Flush mount	12.02	12.24	20	10	2
RW18-MWI	Intermediate	9/12/1985		572158.807	1456606.197	Flush mount	13.8	14.04	30	unknown	2
RW18-MWS	Shallow	9/13/1985		572167.7271	1456601.817	Flush mount	13.68	13.92	10	unknown	2
RW19-MWI	Intermediate	12/19/2016		572240.998	1456746.128	Flush mount	12.64	NM	40	10	2
RW19-MWS	Shallow	12/20/2016		572247.126	1456745.983	Flush mount	12.97	NM	20	10	2
RW21-MWI	Intermediate	4/9/2019		572350.7734	1456246.875	Flush mount	14.46	14.63	40	10	1
RW21-MWP	Perched	1/28/2020		572363.832	1456276.034	Flush mount	13.52	13.87	14	10	2
RW21-MWS	Shallow	8/25/2017		572363.8291	1456276.018	Flush mount	13.51	13.91	28	5	2
RW22R-MWI	Intermediate	4/11/2019		572408.1789	1456074.575	Stick-up Steel Casing	16.63	14.02	40	10	1
RW22R-MWS	Shallow	4/10/2019		572411.5743	1456072.492	Stick-up Steel Casing	16.56	14.02	20	10	1

**TABLE 1**  
**Monitoring Well Construction Summary**  
**Rod Wire Mill Interim Measure Progress Report**

Well Name	Monitoring Area	Installation Date	Abandonment Date	Northing	Easting	Surface Completion	TOC Elevation (ft AMSL)	Ground Surface Elevation (ft AMSL)	Total Well Depth (feet)	Screen Length (feet)	Well Diameter (inch)
RW23-MWI	Intermediate	4/3/2019		571885.073	1456164.16	Flush Mount	14.36	14.6	40	10	1
RW23-MWS	Shallow	4/4/2019		571887.2879	1456162.566	Flush Mount	14.24	14.5	20	10	1
RW24-MWI	Intermediate	4/12/2019		572226.4847	1456459.746	Flush Mount	12.57	12.74	40	10	1
RW24-MWS	Shallow	4/12/2019		572228.5369	1456459.897	Flush Mount	12.55	12.78	20	10	1
RW25-MWI	Intermediate	4/15/2019		572285.8111	1456604.805	Flush Mount	12.08	12.28	40	10	1
RW25-MWS	Shallow	4/12/2019		572287.9682	1456604.755	Flush Mount	11.94	12.16	20	10	1
RWA-MWI	Intermediate	4/10/2019		572458.8731	1455932.71	Stick-up Steel Casing	10.2	7.52	20.3	5	1
RWA-MWS	Shallow	4/10/2019		572463.9889	1455931.14	Stick-up Steel Casing	10.59	7.74	14	10	1
RWB-MWI	Intermediate	4/15/2019		572276.3787	1455905.79	Stick-up Steel Casing	19.73	17.57	40	10	1
RWB-MWS	Shallow	4/16/2019		572280.0647	1455906.999	Stick-up Steel Casing	20.17	17.66	20.5	10	1
RWD-MWI	Intermediate	4/22/2019		572017.6	1455888.923	Stick-up Steel Casing	14.87	12.72	40	10	1
RWD-MWS	Shallow	4/22/2019		572021.3034	1455888.645	Stick-up Steel Casing	14.93	12.68	19.5	10	1
RWE-MWI	Intermediate	4/23/2019		571904.5202	1455877.954	Stick-up Steel Casing	13.92	11.43	40	10	1
RWE-MWS	Shallow	4/22/2019		571908.5576	1455878.188	Stick-up Steel Casing	13.96	11.57	20	10	1
RWF-MWI	Intermediate	4/24/2019		571612.1556	1455889.581	Stick-up Steel Casing	12.31	10.3	40	10	1
RWF-MWS	Shallow	4/24/2019		571613.4919	1455888.933	Stick-up Steel Casing	12.74	10.24	20	10	1
RWG-MWI	Intermediate	4/25/2019		571293.311	1455914.675	Flush Mount	9.45	9.62	40	10	1
RWG-MWS	Shallow	4/24/2019		571296.366	1455914.217	Flush mount	9.64	9.55	20	10	1
RWH-MWI	Intermediate	4/9/2019		572410.3075	1456262.809	Flush Mount	12.03	12.4	33.5	10	1
RWH-MWS	Shallow	4/8/2019		572413.9151	1456261.997	Flush Mount	11.83	12.29	20	10	1
RWI-MWI	Intermediate	4/8/2019		572313.561	1456316.524	Flush Mount	12.95	13.23	40	10	1
RWI-MWS	Shallow	4/8/2019		572315.7998	1456316.335	Flush Mount	12.89	13.23	20	10	1
RWJ-MWI	Intermediate	4/29/2019		572090.2068	1456286.997	Flush Mount	14.1	14.4	40	10	1
RWJ-MWS	Shallow	4/29/2019		572092.2156	1456287.233	Flush Mount	13.81	14.31	20.5	10	1
RWK-MWI	Intermediate	4/2/2019		572083.3646	1456279.397	Flush Mount	14.22	14.54	40	10	1
RWK-MWS	Shallow	4/1/2019		572085.0241	1456279.042	Flush Mount	14.24	14.5	20	10	1
RWL-MWI	Intermediate	4/2/2019		572075.2173	1456267.262	Flush Mount	14.36	14.6	40	10	1
RWL-MWS	Shallow	4/2/2019		572078.1957	1456266.559	Flush Mount	14.26	14.55	20	10	1
RWM-MWI	Intermediate	4/4/2019		572018.7755	1456178.189	Flush Mount	14.92	15.2	40	10	1
RWM-MWS	Shallow	4/4/2019		572019.8634	1456176.579	Flush Mount	14.97	15.21	20	10	1
RWN-MWS	Shallow	4/11/2019		572065.843	1456392.375	Flush Mount	14.84	15.16	25	10	1
RWO-MWI	Intermediate	4/29/2019		572457.7694	1456441.038	Flush Mount	11.67	11.99	40	10	1
RWO-MWS	Shallow	4/29/2019		572462.5312	1456439.69	Flush Mount	11.59	11.93	20	10	1
RWP-MWI	Intermediate	4/17/2019		572456.879	1456719.178	Stick-up Steel Casing	14.32	11.62	40	10	1
RWQ-MWI	Intermediate	4/18/2019		572457.955	1456935.254	Stick-up Steel Casing	17.07	14.87	40	10	1
RWQ-MWS	Shallow	4/17/2019		572461.929	1456935.291	Stick-up Steel Casing	17.11	14.64	20	10	1
RWR-MWI	Intermediate	4/25/2019		571982.59	1456768.613	Flush Mount	13.7	14.04	40	10	1
RWR-MWS	Shallow	4/25/2019		571986.165	1456769.115	Flush Mount	13.68	14.07	20	10	1
RWS-MWI	Intermediate	4/18/2019		572075.052	1457037.284	Stick-up Steel Casing	17.6	15.06	45	10	1
RWS-MWS	Shallow	4/18/2019		572077.763	1457037.433	Stick-up Steel Casing	17.6	15.25	20	10	1

NM = not measured  
TOC = top of casing  
AMSL = above mean sea level

**TABLE 2**  
**Shallow Zone Sampling Frequency**  
**Rod Wire Mill Interim Measure Progress Report**

<b>Well Name</b>	<b>Monitoring Area</b>	<b>Sample Frequency</b>	<b>Sampling Rationale</b>
RWA-MWS	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RWB-MWS	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RWD-MWS	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RWE-MWS	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RWF-MWS	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RWG-MWS	Perimeter	Not Sampled	Outside the area of concern (south) and do not expect to see any changes
RWH-MWS	Delineation	Semi-Annually	Monitor northern perimeter concentrations
RWI-MWS	Delineation	Annually	Monitor the northwest pond
RWJ-MWS	Interior	Semi-Annually	Compare to the intermediate well to assess potential vertical migration
RWK-MWS	Interior	Semi-Annually	Compare to the intermediate well to assess potential vertical migration
RWL-MWS	Interior	Semi-Annually	Compare to the intermediate well to assess potential vertical migration
RWM-MWS	Interior	Not Sampled	Not monitoring the perimeter
RWN-MWS	Interior	Annually	Monitor effect on former sludge storage area and any southern direction impacts before the operational building
RWO-MWS	Delineation	Semi-Annually	Monitor northern perimeter concentrations
RWQ-MWS	Delineation	Semi-Annually	Monitor northern perimeter concentrations
RWR-MWS	Upgradient	Semi-Annually	Monitor eastern perimeter concentrations
RWS-MWS	Upgradient	Semi-Annually	Monitor eastern perimeter concentrations
RW01-MWS	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RW02-MWS	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RW03R-MWS	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RW04-MWS	Perimeter	Not Sampled	In close proximity to RW03-MWS; not needed to monitor the perimeter
RW05-MWS	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RW06R-MWS	Perimeter	Annually	In close proximity to RWD and RWE-MWS; not needed to monitor the perimeter
RW07-MWS	Perimeter	Annually	In close proximity to RWB; not needed to monitor the perimeter
RW08-MWS	Perimeter	Not Sampled	Not monitoring the perimeter
RW09-MWS	Interior	Not Sampled	Not monitoring the perimeter
RW11-MWS	Interior	Annually	Provide spatial coverage in central area
RW12-MWS	Interior	Semi-Annually	Compare to the intermediate well to assess potential vertical migration
RW14-MWS	Interior	Not Sampled	Redundant with other wells monitoring central area
RW15-MWS	Interior	Not Sampled	Redundant with other wells monitoring central area
RW16-MWS	Interior	Annually	Within the area of the northwest disposal pond; provide spatial coverage in central area
RW18-MWS	Interior	Annually	Monitor any southern direction impacts before the operational building; provide spatial coverage in central area
RW19-MWS	Upgradient	Not Sampled	Do not expect to see changes in conditions
RW21-MWP	Delineation	Not Sampled	Installed for NAPL monitoring
RW21-MWS	Delineation	Not Sampled	Redundant with other monitoring wells in the central area
RW22R-MWS	Perimeter	Semi-Annually	Monitor downgradient of northwest pond area; monitor northern perimeter concentrations
RW23-MWS	Interior	Semi-Annually	Monitor southern perimeter and immediately downgradient of operational building concentrations
RW24-MWS	Interior	Not Sampled	Redundant with other monitoring wells in the central area
RW25-MWS	Interior	Not Sampled	Redundant with other monitoring wells in the central area



**TABLE 3**  
**Intermediate Zone Sampling Frequency**  
**Rod Wire Mill Interim Measure Progress Report**

Well Name	Monitoring Area	Sample Frequency	Sampling Rationale
RWA-MWI	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RWB-MWI	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RWD-MWI	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RWE-MWI	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RWF-MWI	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RWG-MWI	Perimeter	Annually	Monitor for changes in perimeter concentrations
RWH-MWI	Delineation	Semi-Annually	Monitor northern perimeter conditions
RWI-MWI	Delineation	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater
RWJ-MWI	Performance	Semi-Annually	Near field wells to monitor trench effectiveness; inside final treatment trench
RWK-MWI	Performance	Semi-Annually	Near field wells to monitor trench effectiveness; immediate well downgradient after final treatment trench
RWL-MWI	Performance	Semi-Annually	Near field wells to monitor trench effectiveness; delineation of final treatment trench
RWM-MWI	Performance	Annually	Trench effectiveness is already being monitored closer to the area of concern
RWO-MWI	Delineation	Semi-Annually	Monitor northern perimeter conditions
RWP-MWI	Delineation	Semi-Annually	Monitor northern perimeter conditions
RWQ-MWI	Delineation	Semi-Annually	Monitor northern perimeter conditions
RWR-MWI	Upgradient	Semi-Annually	Monitor eastern perimeter conditions; monitor concentrations proximal to the operational building
RWS-MWI	Upgradient	Semi-Annually	Monitor eastern perimeter conditions
RW01-MWI	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RW02-MWI	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RW03R-MWI	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RW05R-MWI	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RW06-MWI	Perimeter	Semi-Annually	Monitor for changes in perimeter concentrations
RW06R-MWD	Perimeter	Annually	Monitor any vertical movement of groundwater into lower hydrogeologic zone
RW07-MWI	Perimeter	Semi-Annually	Monitor western perimeter
RW08-MWI	Perimeter	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater
RW09-MWI	Performance	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater
RW10-MWI	Performance	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater
RW11-MWI	Performance	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater
RW12-MWI	Performance	Semi-Annually	Near field wells to monitor trench effectiveness; well immediate upgradient to final treatment trench
RW13-MWI	Performance	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater
RW15-MWI	Performance	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater
RW16-MWI	Performance	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater
RW18-MWI	Performance	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater
RW19-MWI	Upgradient	Annually	Do not expect to see changing conditions because it is upgradient of all treatment trenches
RW21-MWI	Delineation	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater
RW22R-MWI	Perimeter	Semi-Annually	Monitor downgradient of northwest pond area; monitor northern perimeter concentrations
RW23-MWI	Performance	Semi-Annually	Monitor the concentrations along the southern perimeter and immediately downgradient of operational building
RW24-MWI	Performance	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater
RW25-MWI	Performance	Annually	Do not expect to see rapid changing conditions due to passive condition and slow migration of groundwater

**TABLE 4**  
**Shallow Zinc Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RW01-MWS	RW02-MWS	RW03-MWS	RW03R-MWS	RW04-MWS	RW05-MWS	RW06R-MWS	RW07-MWS	RW08-MWS	RW09-MWS	RW11-MWS
2022 Sampling Frequency		Semiannually	Semiannually	NA	Semiannually	Not Sampled	Semiannually	Annually	Annually	Not Sampled	Not Sampled	Annually
5/1/2015	µg/L	DNE	DNE	DNE	DNE	<b>2,330</b>	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	NS	DNE	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/14/2017	µg/L	DNE	DNE	<b>6,200</b>	DNE	NS	DNE	DNE	<b>81.6</b>	<b>1,080</b>	<b>14,500</b>	<b>8,790</b>
3/28/2017-3/29/2017	µg/L	DNE	DNE	<b>6,510</b>	DNE	NS	DNE	DNE	<b>74.8</b>	<b>8,710</b>	<b>12,400</b>	<b>10,500</b>
4/25/2017-4/27/2017	µg/L	DNE	DNE	<b>4,860</b>	DNE	NS	DNE	DNE	<b>86.4</b>	<b>9,520</b>	<b>12,900</b>	<b>13,100</b>
5/22/2017-5/24/2017	µg/L	DNE	DNE	<b>5,380</b>	DNE	NS	DNE	DNE	<b>102</b>	<b>2,680</b>	<b>11,900</b>	<b>12,500</b>
6/5/2017-6/8/2017	µg/L	DNE	DNE	<b>5,500</b>	DNE	<b>58.2</b>	DNE	DNE	<b>107</b>	<b>1,870</b>	<b>13,000</b>	<b>13,500</b>
7/10/2017-7/12/2017	µg/L	DNE	DNE	<b>8,460</b>	DNE	<b>179</b>	DNE	DNE	<b>114</b>	<b>968</b>	<b>11,500</b>	<b>10,900</b>
8/7/2017-8/10/2017	µg/L	<b>12,200</b>	<b>6,290</b>	<b>7,730</b>	DNE	<b>74.7</b>	<b>550</b>	DNE	<b>127</b>	<b>3,190</b>	<b>9,700</b>	<b>10,800</b>
9/1/2017-9/8/2017	µg/L	<b>5,730</b>	<b>3,220</b>	<b>16,300</b>	DNE	<b>163</b>	<b>184</b>	DNE	<b>165</b>	<b>4,460</b>	<b>8,750</b>	<b>10,600</b>
10/2/2017-10/6/2017	µg/L	<b>7,730</b>	<b>5,490</b>	<b>32,100</b>	DNE	<b>137</b>	<b>1,410</b>	DNE	<b>144</b>	<b>1,950</b>	<b>8,310 ML</b>	<b>9,270</b>
11/3/2017-11/13/2017	µg/L	<b>25,200</b>	<b>1,460</b>	<b>14,100</b>	DNE	<b>123</b>	<b>503</b>	DNE	<b>227</b>	<b>1,600</b>	<b>9,290</b>	<b>18,300</b>
12/4/2017-12/8/2017	µg/L	<b>7,300</b>	<b>79.3</b>	<b>46,400</b>	DNE	<b>279</b>	<b>5,440</b>	DNE	<b>216</b>	<b>1,770</b>	<b>8,550</b>	<b>24,000</b>
1/2/2018-1/9/2018	µg/L	<b>35,200</b>	<b>2,210</b>	<b>31,500</b>	DNE	<b>384</b>	<b>35.7</b>	DNE	<b>276</b>	<b>2,600</b>	<b>9,310</b>	<b>27,700</b>
4/8/2018-4/13/2018	µg/L	<b>52,000</b>	<b>5,320</b>	<b>44,000</b>	DNE	<b>300</b>	<b>75.3</b>	DNE	<b>204</b>	<b>13,200</b>	<b>8,980</b>	<b>37,100</b>
7/30/2018-8/3/2018	µg/L	<b>24,100</b>	<b>5,470</b>	<b>25,600</b>	DNE	7.9 J	<b>32.6</b>	<b>22</b>	<b>248</b>	<b>6,640</b>	<b>10,700</b>	<b>109,000</b>
10/1/2018-10/5/2018	µg/L	<b>37,000</b>	<b>5,930</b>	<b>14,900</b>	DNE	<b>168</b>	<b>21.7</b>	3.7 J	<b>223</b>	<b>13,300</b>	<b>10,800</b>	<b>29,500</b>
12/10/2018-12/14/2018*	µg/L	<b>13,700</b>	<b>27,400</b>	<b>23,300</b>	DNE	<b>23.5</b>	10 U	10 U	<b>176</b>	<b>931</b>	<b>9,200</b>	<b>28,900</b>
3/12/2019-3/19/2019*	µg/L	<b>16,500</b>	<b>13,100</b>	<b>9,570</b>	DNE	<b>33.6</b>	10 U	10 U	<b>142</b>	<b>14,600</b>	<b>11,300</b>	<b>13,500</b>
5/3/2019-6/7/2019*	µg/L	<b>16,300</b>	<b>21,900</b>	<b>18,700</b>	DNE	10 U	10 U	<b>20.7</b>	<b>137</b>	<b>11,300</b>	<b>14,100</b>	<b>38,900</b>
9/10/2019-9/23/2019*	µg/L	<b>16,300</b>	<b>27,400</b>	<b>19,200</b>	DNE	<b>313</b>	8.3 B	4.1 B	<b>148</b>	<b>1,350</b>	<b>19,600</b>	<b>44,000</b>
12/3/2019-12/11/2019	µg/L	<b>10,400</b>	<b>594</b>	<b>19,200</b>	DNE	<b>604</b>	<b>41.6</b>	4.3 J	<b>168</b>	<b>1,250</b>	<b>20,600</b>	<b>37,500</b>
3/11/20-3/23/20*	µg/L	<b>9,810</b>	<b>269</b>	<b>16,800</b>	DNE	<b>37.8</b>	5.4 J	4.1 J	<b>124</b>	<b>10,300</b>	<b>20,700</b>	<b>28,900</b>
6/8/20-6/30/20*	µg/L	<b>6,200</b>	<b>1,940</b>	<b>18,800</b>	DNE	<b>79.4</b>	8.6 J	<b>19.4</b>	<b>220</b>	<b>12,000</b>	<b>26,700</b>	<b>37,200</b>
9/9/20-9/29/20*	µg/L	<b>7,050</b>	<b>1,280</b>	NS	DNE	<b>75.4</b>	5.9 J	8 J	NS	<b>2,330</b>	<b>39,900</b>	<b>46,600</b>
11/5/20-11/19/20*	µg/L	<b>4,140</b>	<b>9,950</b>	NS	DNE	<b>54.6</b>	9.8 J	10 U	NS	<b>1,600</b>	<b>45,200</b>	<b>55,200</b>
5/26/21-6/18/21*	µg/L	<b>3,620</b>	<b>472</b>	NS	DNE	NS	7.0 J	10 U	NS	NS	NS	<b>61,000</b>
10/4/21-10/18/21*	µg/L	<b>5,660</b>	3.1 J	NS	DNE	NS	17.8 J	NS	NS	NS	NS	NS
11/29/21-11/30/21*	µg/L	NS	NS	NS	DNE	NS	NS	NS	<b>298</b>	NS	NS	NS
2/23/22-3/28/22*	µg/L	<b>11,300</b>	<b>36,300</b>	DNE	DNE	NS	<b>57</b>	20 U	<b>406</b>	NS	NS	<b>13,500</b>
9/9/2022-9/15/2022*	µg/L	<b>6,406</b>	<b>7,503</b>	DNE	<b>102</b>	NS	<b>15</b>	NS	NS	NS	NS	NS

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**TABLE 4**  
**Shallow Zinc Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RW12-MWS	RW14-MWS	RW15-MWS	RW16-MWS	RW18-MWS	RW19-MWS	RW21-MWS	RW22R-MWS	RW23-MWS	RW24-MWS
2022 Sampling Frequency		Semiannually	Not Sampled	Not Sampled	Annually	Annually	Not Sampled	Not Sampled	Semiannually	Semiannually	Not Sampled
5/1/2015	µg/L	<b>4,290</b>	DNE	DNE	DNE	<b>6,470</b>	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	<b>925</b>	DNE	DNE	DNE	<b>912</b>	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/14/2017	µg/L	NS	DNE	DNE	DNE	NS	<b>10,100</b>	DNE	DNE	DNE	DNE
3/28/2017-3/29/2017	µg/L	NS	DNE	DNE	DNE	NS	<b>7,100</b>	DNE	DNE	DNE	DNE
4/25/2017-4/27/2017	µg/L	NS	DNE	DNE	DNE	NS	<b>6,260</b>	DNE	DNE	DNE	DNE
5/22/2017-5/24/2017	µg/L	NS	DNE	DNE	DNE	NS	<b>4,860</b>	DNE	DNE	DNE	DNE
6/5/2017-6/8/2017	µg/L	<b>11,400</b>	DNE	DNE	DNE	<b>25,500</b>	<b>3,720</b>	DNE	DNE	DNE	DNE
7/10/2017-7/12/2017	µg/L	<b>9,090</b>	DNE	DNE	DNE	<b>13,300</b>	<b>3,700</b>	DNE	DNE	DNE	DNE
8/7/2017-8/10/2017	µg/L	<b>5,090</b>	<b>42,000</b>	<b>276</b>	NS	<b>964</b>	<b>3,360</b>	DNE	DNE	DNE	DNE
9/1/2017-9/8/2017	µg/L	<b>3,980</b>	<b>43,500</b>	<b>1,080</b>	<b>25.6</b>	<b>6,160</b>	<b>2,990</b>	DNE	DNE	DNE	DNE
10/2/2017-10/6/2017	µg/L	<b>3,790</b>	<b>28,900</b>	<b>900</b>	<b>26.2</b>	<b>14,500</b>	<b>18,700</b>	DNE	DNE	DNE	DNE
11/3/2017-11/13/2017	µg/L	<b>235,000</b>	<b>28,100</b>	<b>8,800</b>	<b>48.6</b>	<b>10,700</b>	<b>2,730</b>	DNE	DNE	DNE	DNE
12/4/2017-12/8/2017	µg/L	<b>2,980</b>	<b>49,200</b>	<b>7,630</b>	<b>27.7</b>	<b>23,400</b>	<b>3,380</b>	DNE	DNE	DNE	DNE
1/2/2018-1/9/2018	µg/L	<b>10,100</b>	<b>61,800</b>	<b>5,150</b>	<b>31.2</b>	<b>11,600</b>	<b>10,200</b>	DNE	DNE	DNE	DNE
4/8/2018-4/13/2018	µg/L	<b>10,600</b>	<b>62,100</b>	<b>5,940</b>	<b>25</b>	<b>25,900</b>	<b>7,060</b>	DNE	DNE	DNE	DNE
7/30/2018-8/3/2018	µg/L	<b>2,900</b>	<b>64,100</b>	<b>1,320</b>	<b>35.9</b>	<b>439</b>	<b>10,100</b>	DNE	DNE	DNE	DNE
10/1/2018-10/5/2018	µg/L	<b>1,140</b>	<b>80,100</b>	<b>2,950</b>	<b>30.0</b>	<b>44.9</b>	<b>10,500</b>	DNE	DNE	DNE	DNE
12/10/2018-12/14/2018*	µg/L	<b>8,570</b>	<b>79,200</b>	<b>4,380</b>	5.5 J	<b>12.7</b>	<b>3,390</b>	DNE	DNE	DNE	DNE
3/12/2019-3/19/2019*	µg/L	<b>4,640</b>	<b>65,700</b>	<b>499</b>	7 J	<b>30</b>	<b>4,680</b>	DNE	DNE	DNE	DNE
5/3/2019-6/7/2019*	µg/L	<b>1,550</b>	<b>69,600</b>	<b>684</b>	<b>106</b>	<b>16.9</b>	<b>3,180</b>	<b>282,000</b>	<b>58,100</b>	<b>22.4</b>	5 J
9/10/2019-9/23/2019*	µg/L	<b>5,390</b>	<b>70,500</b>	<b>134</b>	10.0 U	4.3 B	<b>2,260</b>	<b>330,000</b>	<b>188,000</b>	<b>20.6</b>	8.2 J
12/3/2019-12/11/2019	µg/L	<b>763</b>	<b>77,500</b>	<b>378</b>	<b>22.7</b>	<b>15.2</b>	<b>2,640</b>	<b>368,000</b>	<b>112,000</b>	<b>38.6</b>	6.7 J
3/11/20-3/23/20*	µg/L	NS	<b>70,800</b>	<b>105</b>	10 U	4.2 J	<b>5,300</b>	<b>301,000</b>	<b>213,000</b>	5 J	3.5 J
6/8/20-6/30/20*	µg/L	<b>4,660</b>	<b>71,900</b>	2.7 J	10 U	4.2 J	<b>2,710</b>	<b>268,000</b>	<b>217,000</b>	2.7 J	3.4 J
9/9/20-9/29/20*	µg/L	NS	<b>56,600</b>	9.4 J	<b>22.3</b>	<b>22.7</b>	<b>22,600</b>	<b>298,000</b>	<b>253,000</b>	6.4 J	<b>16.4</b>
11/5/20-11/19/20*	µg/L	NS	<b>50,200</b>	3.3 J	3.7 J	3.3 J	<b>6,190</b>	<b>325,000</b>	<b>145,000</b>	5.9 J	10 U
5/26/21-6/18/21*	µg/L	NS	NS	NS	3.0 J	<b>20.1</b>	NS	NS	<b>169,000</b>	2.8 J	NS
10/4/21-10/18/21*	µg/L	<b>4,960</b>	NS	NS	NS	NS	NS	NS	<b>137,000</b>	6.5 J	NS
11/29/21-11/30/21*	µg/L	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
2/23/22-3/28/22*	µg/L	<b>12,400</b>	NS	NS	20 U	200 U	NS	NS	<b>113,000</b>	20 U	NS
9/9/2022-9/15/2022*	µg/L	<b>21,800</b>	NS	NS	NS	NS	NS	NS	<b>197,000</b>	10 U	NS

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**TABLE 4**  
**Shallow Zinc Concentrations**  
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Sampling Dates	Units	RW25-MWS	RWA-MWS	RWB-MWS	RWD-MWS	RWE-MWS	RWF-MWS	RWG-MWS	RWH-MWS	RWI-MWS	RWJ-MWS
2022 Sampling Frequency		Not Sampled	Semiannually	Semiannually	Semiannually	Semiannually	Semiannually	Not Sampled	Semiannually	Annually	Semiannually
5/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/14/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/28/2017-3/29/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/25/2017-4/27/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/22/2017-5/24/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/5/2017-6/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/10/2017-7/12/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
8/7/2017-8/10/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
9/1/2017-9/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/2/2017-10/6/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/3/2017-11/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/4/2017-12/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
1/2/2018-1/9/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/8/2018-4/13/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/30/2018-8/3/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2018-10/5/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/10/2018-12/14/2018*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/12/2019-3/19/2019*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/3/2019-6/7/2019*	µg/L	<b>70,500</b>	<b>516</b>	7.4 J	4.7 J	<b>468</b>	<b>39,100</b>	10 U	<b>367</b>	<b>25,800</b>	10 U
9/10/2019-9/23/2019*	µg/L	<b>437,000</b>	<b>1,720</b>	5.5 J	9.1 J	<b>422</b>	<b>34,300</b>	10.0 U	<b>60,600</b>	<b>26,200</b>	<b>27</b>
12/3/2019-12/11/2019	µg/L	<b>11,900</b>	<b>49.7</b>	<b>38.7</b>	5.4 J	<b>261</b>	<b>35,000</b>	<b>194</b>	<b>2,600</b>	<b>32,400</b>	8.3 J
3/11/20-3/23/20*	µg/L	<b>2,570</b>	9.7 J	6.1 J	3.6 J	<b>303</b>	<b>33,900</b>	2.9 J	<b>19,300</b>	<b>1,510</b>	10 U
6/8/20-6/30/20*	µg/L	<b>5,720</b>	<b>21.5</b>	10 U	10 U	<b>1,360</b>	<b>31,200</b>	9.8 J	<b>48.9</b>	<b>211</b>	4 J
9/9/20-9/29/20*	µg/L	<b>2,780</b>	<b>182</b>	5.8 J	4.2 J	<b>22,100</b>	<b>44,400</b>	10 U	<b>5,330</b>	NS	2.6 J
11/5/20-11/19/20*	µg/L	<b>9,930</b>	<b>52.1</b>	<b>11.9</b>	3 J	<b>156</b>	<b>39,000</b>	10 U	<b>1,310</b>	NS	10 U
5/26/21-6/18/21*	µg/L	NS	6.1 J	10 U	10 U	<b>21,900</b>	<b>32,800</b>	NS	<b>3,400</b>	NS	10 U
10/4/21-10/18/21*	µg/L	NS	7.6 J	12.4 J	10 J	<b>1,630</b>	<b>25,200</b>	NS	<b>6,670</b>	NS	<b>38.2</b>
11/29/21-11/30/21*	µg/L	NS	NS	NS	NS	NS	NS	NS	NS	2.0 J	NS
2/23/22-3/28/22*	µg/L	NS	<b>47</b>	20 U	20 U	<b>174</b>	<b>33,600</b>	NS	<b>3,270</b>	<b>24,300</b>	20 U
9/9/2022-9/15/2022*	µg/L	NS	<b>628</b>	5.072 J	<b>38</b>	<b>8,214</b>	<b>24,250</b>	NS	<b>2,468</b>	NS	10 U

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**Shallow Zinc Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RWK-MWS	RWL-MWS	RWM-MWS	RWN-MWS	RWO-MWS	RWQ-MWS	RWR-MWS	RWS-MWS
2022 Sampling Frequency		Semiannually	Semiannually	Not Sampled	Annually	Semiannually	Semiannually	Semiannually	Semiannually
5/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/14/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/28/2017-3/29/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/25/2017-4/27/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/22/2017-5/24/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/5/2017-6/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/10/2017-7/12/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
8/7/2017-8/10/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
9/1/2017-9/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/2/2017-10/6/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/3/2017-11/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/4/2017-12/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
1/2/2018-1/9/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/8/2018-4/13/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/30/2018-8/3/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2018-10/5/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/10/2018-12/14/2018*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/12/2019-3/19/2019*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/3/2019-6/7/2019*	µg/L	<b>6,710</b>	<b>8,480</b>	6 J	<b>978,000</b>	<b>2,660</b>	<b>146</b>	<b>213,000</b>	<b>10,100</b>
9/10/2019-9/23/2019*	µg/L	<b>19,200</b>	<b>9,180</b>	4.0 J	<b>964,000</b>	<b>6,790</b>	<b>147</b>	<b>245,000</b>	<b>1,980</b>
12/3/2019-12/11/2019	µg/L	<b>20,600</b>	<b>15,500</b>	<b>11.6</b>	<b>943,000</b>	<b>3,720</b>	<b>182</b>	<b>320,000</b>	<b>2,970</b>
3/11/20-3/23/20*	µg/L	<b>16,400</b>	<b>861</b>	4.8 J	<b>1,170,000</b>	<b>6,220</b>	<b>194</b>	<b>344,000</b>	<b>19,100</b>
6/8/20-6/30/20*	µg/L	<b>10,400</b>	<b>16,100</b>	<b>21.8</b>	<b>884,000</b>	<b>11,100</b>	<b>149</b>	<b>327,000</b>	<b>954,000</b>
9/9/20-9/29/20*	µg/L	<b>16,800</b>	<b>15,000</b>	7.8 J	<b>1,140,000</b>	<b>5,030</b>	<b>162</b>	<b>326,000</b>	<b>60,300</b>
11/5/20-11/19/20*	µg/L	<b>18,100</b>	<b>14,200</b>	<b>10.6</b>	<b>709,000</b>	<b>2,750</b>	<b>152</b>	<b>293,000</b>	<b>7,260</b>
5/26/21-6/18/21*	µg/L	<b>22,200</b>	<b>16,000</b>	NS	<b>745,000</b>	<b>1,130</b>	<b>158</b>	<b>269,000</b>	<b>116,000</b>
10/4/21-10/18/21*	µg/L	<b>18,500</b>	<b>14,900</b>	NS	NS	<b>694</b>	<b>166</b>	<b>298,000</b>	<b>36,700</b>
11/29/21-11/30/21*	µg/L	NS	NS	NS	NS	NS	NS	NS	NS
2/23/22-3/28/22*	µg/L	<b>22,300</b>	<b>12,500</b>	NS	<b>548,000</b>	<b>397</b>	<b>239</b>	<b>267,000</b>	<b>97,500</b>
9/9/2022-9/15/2022*	µg/L	<b>24,170</b>	<b>11,470</b>	NS	NS	<b>49</b>	<b>134</b>	<b>205,000</b>	<b>22,290</b>

**Bold indicates detection above the reporting limit**

NS = Not Sampled

DNE = Did Not Exist

\*Indicates concentrations are for dissolved metals. All other events show total metals.

**TABLE 5**  
**Shallow Cadmium Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RW01-MWS	RW02-MWS	RW03-MWS	RW03R-MWS	RW04-MWS	RW05-MWS	RW06R-MWS	RW07-MWS	RW08-MWS	RW09-MWS	RW11-MWS
2022 Sampling Frequency		Semiannually	Semiannually	NA	Semiannually	Not Sampled	Semiannually	Annually	Annually	Not Sampled	Not Sampled	Annually
5/1/2015	µg/L	DNE	DNE	DNE	DNE	<b>2.8</b>	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	NS	DNE	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/14/2017	µg/L	DNE	DNE	<b>7.9</b>	DNE	NS	DNE	DNE	<b>1.8 J</b>	<b>3.8</b>	<b>22.3</b>	<b>0.78 J</b>
3/28/2017-3/29/2017	µg/L	DNE	DNE	<b>4.7</b>	DNE	NS	DNE	DNE	<b>1.7 J</b>	<b>11</b>	<b>17.5</b>	<b>1.8 J</b>
4/25/2017-4/27/2017	µg/L	DNE	DNE	<b>3.2</b>	DNE	NS	DNE	DNE	<b>1.4 J</b>	<b>7.8</b>	<b>16.6</b>	<b>5.3</b>
5/22/2017-5/24/2017	µg/L	DNE	DNE	<b>3.9</b>	DNE	NS	DNE	DNE	<b>1.9 J</b>	<b>3.2</b>	<b>14.9</b>	<b>1.8 J</b>
6/5/2017-6/8/2017	µg/L	DNE	DNE	<b>4</b>	DNE	<b>0.7 J</b>	DNE	DNE	<b>2.3 J</b>	<b>1.7 J</b>	<b>13.9</b>	<b>0.94 J</b>
7/10/2017-7/12/2017	µg/L	DNE	DNE	<b>4.6</b>	DNE	<b>1.2 J</b>	DNE	DNE	<b>2.8 J</b>	<b>0.74 J</b>	<b>13.4</b>	<b>0.84 J</b>
8/7/2017-8/10/2017	µg/L	<b>1.6 J</b>	<b>12</b>	<b>5.1</b>	DNE	<i>3 U</i>	<b>4.9</b>	DNE	<b>3.1</b>	<b>2.7 J</b>	<b>12.5</b>	<b>1.3 J</b>
9/1/2017-9/8/2017	µg/L	<b>1.2 J</b>	<b>11.8</b>	<b>8.4</b>	DNE	<b>0.71 J</b>	<b>0.37 J</b>	DNE	<b>3.6</b>	<b>2.5 J</b>	<b>12.3</b>	<b>0.81 J</b>
10/2/2017-10/6/2017	µg/L	<b>1.7 J</b>	<b>9.1</b>	<b>11</b>	DNE	<i>3 U</i>	<b>1.2 J</b>	DNE	<b>3.2</b>	<b>0.96 J</b>	<b>10.6</b>	<i>3 U</i>
11/3/2017-11/13/2017	µg/L	<b>21.7</b>	<b>7.7</b>	<b>8.5</b>	DNE	<b>1.1 J</b>	<i>3 U</i>	DNE	<b>5.8</b>	<i>3 U</i>	<b>10.5</b>	<b>2.1 J</b>
12/4/2017-12/8/2017	µg/L	<b>98</b>	<i>3 U</i>	<b>11.4</b>	DNE	<b>1.1 J</b>	<b>8.4</b>	DNE	<b>6</b>	<i>3 U</i>	<b>9.2</b>	<b>2.9 J</b>
1/2/2018-1/9/2018	µg/L	<b>23.9</b>	<b>13.1</b>	<b>9.9</b>	DNE	<i>3 U</i>	<i>3 U</i>	DNE	<b>4.8</b>	<i>3 U</i>	<b>9.9</b>	<b>2.2 J</b>
4/8/2018-4/13/2018	µg/L	<b>7.6</b>	<b>16.7</b>	<b>11.8</b>	DNE	<i>3 U</i>	<i>3 U</i>	DNE	<b>4.6</b>	<b>2.2 J</b>	<b>9.8</b>	<b>4.1</b>
7/30/2018-8/3/2018	µg/L	<b>1.6 J</b>	<b>5.2</b>	<b>10.8</b>	DNE	<i>3 U</i>	<i>3 U</i>	<i>3 U</i>	<b>4.8</b>	<i>3 U</i>	<b>13.1</b>	<b>66.3</b>
10/1/2018-10/5/2018	µg/L	<b>0.97 J</b>	<b>3.4</b>	<b>8.7</b>	DNE	<i>3 U</i>	<i>3 U</i>	<i>3 U</i>	<b>4.7</b>	<i>3 U</i>	<b>22.3</b>	<b>1.2 J</b>
12/10/2018-12/14/2018*	µg/L	<b>1.8 J</b>	<b>9</b>	<b>24</b>	DNE	<i>3 U</i>	<i>3 U</i>	<b>0.56 J</b>	<b>4.1</b>	<i>3 U</i>	<b>9.3</b>	<b>0.81 J</b>
3/12/2019-3/19/2019*	µg/L	<b>2.3 J</b>	<b>3.8</b>	<b>7.7</b>	DNE	<i>3 U</i>	<i>3 U</i>	<i>3 U</i>	<b>2.7 J</b>	<b>2 J</b>	<b>10.2</b>	<b>2.2 J</b>
5/3/2019-6/7/2019*	µg/L	<b>4.7</b>	<b>1.7 J</b>	<b>17.9</b>	DNE	<i>3 U</i>	<i>3 U</i>	<i>3 U</i>	<b>2.9 J</b>	<b>0.86 J</b>	<b>12</b>	<i>1.1 B</i>
9/10/2019-9/23/2019*	µg/L	<b>4.3</b>	<b>1.1 J</b>	<b>16.3</b>	DNE	<b>0.55 J</b>	<i>3.0 U</i>	<i>3.0 U</i>	<b>3.4</b>	<b>0.39 J</b>	<b>16.7</b>	<i>3.0 U</i>
12/3/2019-12/11/2019	µg/L	<i>3.9 B</i>	<i>0.55 B</i>	<b>18.8</b>	DNE	<b>1.8 J</b>	<i>3.0 U</i>	<i>3.0 U</i>	<b>3.0 J</b>	<i>3.0 U</i>	<b>14.3</b>	<b>1.9 J</b>
3/11/20-3/23/20*	µg/L	<b>4.4</b>	<b>0.97 J</b>	<b>18.8</b>	DNE	<b>1.7 J</b>	<b>0.52 J</b>	<i>3 U</i>	<b>2.5 J</b>	<b>2.7 J</b>	<b>16.9</b>	<b>2 J</b>
6/8/20-6/30/20*	µg/L	<b>1.6 J</b>	<b>0.61 J</b>	<b>14.5</b>	DNE	<b>0.99 J</b>	<b>0.53 J</b>	<b>0.98 J</b>	<b>4.5</b>	<b>0.67 J</b>	<b>15.2</b>	<b>2.5 J</b>
9/9/20-9/29/20*	µg/L	<b>1.3 J</b>	<b>0.43 J</b>	NS	DNE	<b>0.62 J</b>	<i>3 U</i>	<b>0.69 J</b>	NS	<i>3 U</i>	<b>17</b>	<b>2.2 J</b>
11/5/20-11/19/20*	µg/L	<b>1.1 J</b>	<b>0.58 J</b>	NS	DNE	<b>0.38 J</b>	<i>3 U</i>	<b>0.9 J</b>	NS	<b>0.37 J</b>	<b>16</b>	<b>2 J</b>
5/26/21-6/18/21*	µg/L	<b>0.40 J</b>	<i>3 U</i>	NS	DNE	NS	<i>3 U</i>	<i>3 U</i>	NS	NS	NS	<b>3.4</b>
10/4/21-10/18/21*	µg/L	<i>1 U</i>	<i>1 U</i>	NS	DNE	NS	<i>1 U</i>	NS	NS	NS	NS	NS
11/29/21-11/30/21*	µg/L	NS	NS	NS	DNE	NS	NS	NS	<b>1.7</b>	NS	NS	NS
2/23/22-3/28/22*	µg/L	<i>2 U</i>	<i>2 U</i>	DNE	DNE	NS	<i>2 U</i>	<i>2 U</i>	<b>16.6</b>	NS	NS	<i>2 U</i>
9/9/2022-9/15/2022*	µg/L	<b>0.552</b>	<b>0.1269 J</b>	DNE	<i>0.2 U</i>	NS	<b>0.1181 J</b>	NS	NS	NS	NS	NS

**Bold indicates detection above the reporting limit**

NS = Not Sampled

DNE = Did Not Exist

\*Indicates concentrations are for dissolved metals. All other events show total metals.

**TABLE 5**  
**Shallow Cadmium Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RW12-MWS	RW14-MWS	RW15-MWS	RW16-MWS	RW18-MWS	RW19-MWS	RW21-MWS	RW22R-MWS	RW23-MWS	RW24-MWS
2022 Sampling Frequency		Semiannually	Not Sampled	Not Sampled	Annually	Annually	Not Sampled	Not Sampled	Semiannually	Semiannually	Not Sampled
5/1/2015	µg/L	<b>4.4</b>	DNE	DNE	DNE	<b>168</b>	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	<b>3.2</b>	DNE	DNE	DNE	<b>31.3</b>	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/14/2017	µg/L	NS	DNE	DNE	DNE	NS	<b>14.8</b>	DNE	DNE	DNE	DNE
3/28/2017-3/29/2017	µg/L	NS	DNE	DNE	DNE	NS	<b>6.9</b>	DNE	DNE	DNE	DNE
4/25/2017-4/27/2017	µg/L	NS	DNE	DNE	DNE	NS	<b>8.5</b>	DNE	DNE	DNE	DNE
5/22/2017-5/24/2017	µg/L	NS	DNE	DNE	DNE	NS	<b>3.6</b>	DNE	DNE	DNE	DNE
6/5/2017-6/8/2017	µg/L	<b>29.7</b>	DNE	DNE	DNE	<b>356</b>	<b>2.4 J</b>	DNE	DNE	DNE	DNE
7/10/2017-7/12/2017	µg/L	<b>12.6</b>	DNE	DNE	DNE	<b>240</b>	<b>9.7</b>	DNE	DNE	DNE	DNE
8/7/2017-8/10/2017	µg/L	<b>7</b>	<b>1,780</b>	<b>12.2</b>	NS	<b>34.9</b>	<b>7.2</b>	DNE	DNE	DNE	DNE
9/1/2017-9/8/2017	µg/L	<b>5.1</b>	<b>1,700</b>	<b>29.9</b>	3 U	<b>156</b>	<b>2.6 J</b>	DNE	DNE	DNE	DNE
10/2/2017-10/6/2017	µg/L	<b>11.3</b>	<b>1,750</b>	<b>25.3</b>	3 U	<b>306</b>	<b>5.2</b>	DNE	DNE	DNE	DNE
11/3/2017-11/13/2017	µg/L	<b>193</b>	<b>2,390</b>	<b>63</b>	3 U	<b>208</b>	<b>4.4</b>	DNE	DNE	DNE	DNE
12/4/2017-12/8/2017	µg/L	<b>4.2</b>	<b>2,820</b>	<b>55</b>	3 U	<b>410</b>	<b>4.6</b>	DNE	DNE	DNE	DNE
1/2/2018-1/9/2018	µg/L	<b>11.7</b>	<b>2,800</b>	<b>40.7</b>	3 U	<b>218</b>	<b>4.8</b>	DNE	DNE	DNE	DNE
4/8/2018-4/13/2018	µg/L	<b>11</b>	<b>3,220</b>	<b>41.2</b>	3 U	<b>448</b>	<b>6.6</b>	DNE	DNE	DNE	DNE
7/30/2018-8/3/2018	µg/L	<b>5.2</b>	<b>3,630</b>	<b>38.5</b>	3 U	<b>7.1</b>	<b>1.2 J</b>	DNE	DNE	DNE	DNE
10/1/2018-10/5/2018	µg/L	<b>2.3 J</b>	<b>3,840</b>	<b>78.1</b>	3 U	<b>1.2 J</b>	<b>3.6</b>	DNE	DNE	DNE	DNE
12/10/2018-12/14/2018*	µg/L	<b>15.3</b>	<b>3,730</b>	<b>94.4</b>	3 U	<b>1.5 J</b>	3 U	DNE	DNE	DNE	DNE
3/12/2019-3/19/2019*	µg/L	<b>6.6</b>	<b>2,960</b>	<b>15.4</b>	3 U	3 U	3 U	DNE	DNE	DNE	DNE
5/3/2019-6/7/2019*	µg/L	<b>2.1 J</b>	<b>3,000</b>	<b>19.1</b>	3 U	3 U	3 U	<b>483</b>	<b>157</b>	3 U	3 U
9/10/2019-9/23/2019*	µg/L	<b>3.2</b>	<b>3,450</b>	<b>7.4</b>	3.0 U	3.0 U	3.0 U	<b>354</b>	<b>105</b>	<b>0.88 J</b>	3.0 U
12/3/2019-12/11/2019	µg/L	<b>2.5 J</b>	<b>3,990</b>	<b>8.5</b>	<b>0.36 J</b>	<b>1.9 J</b>	<b>1.2 J</b>	<b>433</b>	<b>70.4</b>	<b>1.3 J</b>	<b>0.43 J</b>
3/11/20-3/23/20*	µg/L	NS	<b>3,020</b>	<b>4.3</b>	3 U	3 U	<b>0.66 J</b>	<b>378</b>	<b>62.9</b>	<b>0.52 J</b>	3 U
6/8/20-6/30/20*	µg/L	<b>5.2</b>	<b>3,590</b>	3 U	3 U	3 U	<b>0.77 J</b>	<b>322</b>	<b>51.4</b>	3 U	3 U
9/9/20-9/29/20*	µg/L	NS	<b>3,240</b>	<b>0.51 J</b>	3 U	3 U	<b>4.3</b>	<b>294</b>	<b>52.1</b>	3 U	3 U
11/5/20-11/19/20*	µg/L	NS	<b>3,020</b>	3 U	3 U	3 U	<b>1.3 J</b>	<b>367</b>	<b>30.7</b>	3 U	3 U
5/26/21-6/18/21*	µg/L	NS	NS	NS	3 U	3 U	NS	NS	<b>78.5</b>	3 U	NS
10/4/21-10/18/21*	µg/L	1 U	NS	NS	NS	NS	NS	NS	<b>117</b>	1 U	NS
11/29/21-11/30/21*	µg/L	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
2/23/22-3/28/22*	µg/L	2 U	NS	NS	2 U	2 U	NS	NS	<b>29.4</b>	2 U	NS
9/9/2022-9/15/2022*	µg/L	<b>3.048</b>	NS	NS	NS	NS	NS	NS	<b>56.91</b>	<b>0.1371</b>	NS

**Bold indicates detection above the reporting limit**

NS = Not Sampled

DNE = Did Not Exist

\*Indicates concentrations are for dissolved metals. All other events show total metals.

**TABLE 5**  
**Shallow Cadmium Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RW25-MWS	RWA-MWS	RWB-MWS	RWD-MWS	RWE-MWS	RWF-MWS	RWG-MWS	RWH-MWS	RWI-MWS	RWJ-MWS
2022 Sampling Frequency		Not Sampled	Semiannually	Semiannually	Semiannually	Semiannually	Semiannually	Not Sampled	Semiannually	Annually	Semiannually
5/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/14/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/28/2017-3/29/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/25/2017-4/27/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/22/2017-5/24/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/5/2017-6/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/10/2017-7/12/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
8/7/2017-8/10/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
9/1/2017-9/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/2/2017-10/6/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/3/2017-11/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/4/2017-12/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
1/2/2018-1/9/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/8/2018-4/13/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/30/2018-8/3/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2018-10/5/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/10/2018-12/14/2018*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/12/2019-3/19/2019*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/3/2019-6/7/2019*	µg/L	<b>491</b>	<b>2.3 J</b>	3 U	3 U	<b>0.57 J</b>	<b>4.2</b>	3 U	<b>20</b>	<b>714</b>	3 U
9/10/2019-9/23/2019*	µg/L	<b>599</b>	<b>24</b>	3.0 U	3.0 U	<b>0.64 J</b>	<b>6.1</b>	3.0 U	<b>856</b>	<b>840</b>	3.0 U
12/3/2019-12/11/2019	µg/L	<b>9.9</b>	<b>4.4</b>	3.0 U	3.0 U	<b>2.0 J</b>	<b>7.3</b>	3.0 U	<b>19.9</b>	<b>1,080</b>	3.0 U
3/11/20-3/23/20*	µg/L	<b>2.7 J</b>	<b>0.6 J</b>	3 U	3 U	<b>0.91 J</b>	<b>7.7</b>	3 U	<b>163</b>	<b>125</b>	3 U
6/8/20-6/30/20*	µg/L	<b>4.6</b>	<b>0.88 J</b>	3 U	<b>0.46 J</b>	<b>1.4 J</b>	<b>5.7</b>	<b>0.63 J</b>	<b>0.97 J</b>	<b>17.5</b>	3 U
9/9/20-9/29/20*	µg/L	<b>7.0</b>	<b>2.9 J</b>	3 U	<b>0.46 J</b>	<b>8.7</b>	<b>6.0</b>	3 U	<b>22.4</b>	NS	3 U
11/5/20-11/19/20*	µg/L	<b>8.6</b>	<b>1.5 J</b>	3 U	3 U	<b>0.44 J</b>	<b>4.6</b>	3 U	<b>7.0</b>	NS	3 U
5/26/21-6/18/21*	µg/L	NS	<b>0.48 J</b>	3 U	3 U	<b>10.9</b>	<b>4.0</b>	NS	<b>9.9</b>	NS	3 U
10/4/21-10/18/21*	µg/L	NS	1 U	1 U	1 U	<b>0.55 J</b>	<b>3.4</b>	NS	<b>6.8</b>	NS	<b>0.22 J</b>
11/29/21-11/30/21*	µg/L	NS	NS	NS	NS	NS	NS	NS	NS	<b>0.76 J</b>	NS
2/23/22-3/28/22*	µg/L	NS	2 U	2 U	2 U	2 U	<b>4.9</b>	NS	<b>7.0</b>	<b>1,010</b>	2 U
9/9/2022-9/15/2022*	µg/L	NS	<b>3.9</b>	0.2 U	<b>0.81</b>	<b>3.58</b>	<b>2.5</b>	NS	<b>26.3</b>	NS	0.2 U

**Bold indicates detection above the reporting limit**

NS = Not Sampled

DNE = Did Not Exist

\*Indicates concentrations are for dissolved metals. All other events show total metals.



**TABLE 5**  
**Shallow Cadmium Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RWK-MWS	RWL-MWS	RWM-MWS	RWN-MWS	RWO-MWS	RWQ-MWS	RWR-MWS	RWS-MWS
2022 Sampling Frequency		Semiannually	Semiannually	Not Sampled	Annually	Semiannually	Semiannually	Semiannually	Semiannually
5/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/14/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/28/2017-3/29/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/25/2017-4/27/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/22/2017-5/24/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/5/2017-6/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/10/2017-7/12/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
8/7/2017-8/10/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
9/1/2017-9/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/2/2017-10/6/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/3/2017-11/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/4/2017-12/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
1/2/2018-1/9/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/8/2018-4/13/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/30/2018-8/3/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2018-10/5/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/10/2018-12/14/2018*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/12/2019-3/19/2019*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/3/2019-6/7/2019*	µg/L	3 U	3 U	3 U	<b>13,000</b>	<b>1.4 J</b>	<b>2.6 J</b>	<b>50</b>	3 U
9/10/2019-9/23/2019*	µg/L	3.0 U	3.0 U	3.0 U	<b>11,100</b>	<b>1.3 J</b>	<b>2.6 J</b>	<b>41</b>	3.0 U
12/3/2019-12/11/2019	µg/L	3.0 U	3.0 U	<b>0.36 J</b>	<b>11,200</b>	<b>7.6</b>	<b>4.4</b>	<b>42.3</b>	3.0 U
3/11/20-3/23/20*	µg/L	3 U	<b>0.85 J</b>	3 U	<b>9,420</b>	<b>0.65 J</b>	<b>3.1</b>	<b>38.8</b>	3 U
6/8/20-6/30/20*	µg/L	3 U	<b>0.52 J</b>	3 U	<b>6,810</b>	<b>0.46 J</b>	<b>2.9 J</b>	<b>35.5</b>	<b>1.9 J</b>
9/9/20-9/29/20*	µg/L	<b>0.51 J</b>	<b>0.59 J</b>	3 U	<b>7,350</b>	<b>4.1</b>	<b>3.3</b>	<b>34.3</b>	<b>0.42 J</b>
11/5/20-11/19/20*	µg/L	<b>0.37 J</b>	3 U	3 U	<b>6,260</b>	<b>0.53 J</b>	<b>3.2</b>	<b>33.8</b>	<b>0.39 J</b>
5/26/21-6/18/21*	µg/L	3 U	3 U	NS	<b>4,850</b>	<b>0.85 J</b>	<b>3.4</b>	<b>35.1</b>	3 U
10/4/21-10/18/21*	µg/L	1 U	<b>0.37 J</b>	NS	NS	1 U	<b>3.1</b>	<b>39.3</b>	10 U
11/29/21-11/30/21*	µg/L	NS	NS	NS	NS	NS	NS	NS	NS
2/23/22-3/28/22*	µg/L	2 U	2 U	NS	<b>2260</b>	2 U	<b>3.3</b>	<b>28.8</b>	2 U
9/9/2022-9/15/2022*	µg/L	0.2 U	<b>0.141</b>	NS	NS	<b>0.075</b>	<b>2.7</b>	<b>23.54</b>	<b>0.230</b>

**Bold indicates detection above the reporting limit**

NS = Not Sampled

DNE = Did Not Exist

\*Indicates concentrations are for dissolved metals. All other events show total metals.

**TABLE 6**  
**2022 Shallow Field Parameter Data**  
**Rod Wire Mill Interim Measures Progress Report**

Parameters	Units	RW01-MWS		RW02-MWS		RW03/03R-MWS		RW05-MWS		RW06R-MWS		RW07-MWS		RW11-MWS	
		Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22
pH	s.u.	6.09	6.07	6.31	6.68	<i>DNE</i>	11.25	6.52	6.74	10.14	<i>NS</i>	9.08	<i>NS</i>	5.53	<i>NS</i>
Specific Conductance	ms/cm	0.928	1.178	1.54	1.602	<i>DNE</i>	3.516	3.21	3.545	3.29	<i>NS</i>	5.62	<i>NS</i>	1.79	<i>NS</i>
Dissolved Oxygen	mg/L	NA	1.16	NA	0.11	<i>DNE</i>	0.12	NA	0.2	5.92	<i>NS</i>	NA	<i>NS</i>	NA	<i>NS</i>
ORP	mV	-42	-9.3	-111	-120	<i>DNE</i>	-127.6	40	-54.9	94	<i>NS</i>	-118	<i>NS</i>	15	<i>NS</i>
Turbidity	NTU	8.91	9.93	5.71	9.2	<i>DNE</i>	4.67	9.4	9.78	6.95	<i>NS</i>	11.54	<i>NS</i>	6.03	<i>NS</i>
Depth To Water	ft	8.41	7.98	8.08	8.22	<i>DNE</i>	12.04	7.99	8.15	7.37	<i>NS</i>	10.12	<i>NS</i>	9.58	<i>NS</i>

Parameters	Units	RW12-MWS		RW16-MWS		RW18-MWS		RW22R-MWS		RW23-MWS		RWA-MWS		RWB-MWS	
		Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22
pH	s.u.	5.51	6.38	10.62	<i>NS</i>	7.58	<i>NS</i>	4.2	5.42	5.17	5.94	6.63	7.56	6.06	8.45*
Specific Conductance	ms/cm	1.75	3.067	5.99	<i>NS</i>	21.4	<i>NS</i>	2.72	3.03	0.509	0.899	3.17	2.244	1.01	1.058*
Dissolved Oxygen	mg/L	NA	0.25	NA	<i>NS</i>	NA	<i>NS</i>	NA	0.29	NA	0.2	NA	0.07	NA	2.45*
ORP	mV	10	-47.7	-330	<i>NS</i>	-104	<i>NS</i>	2	85.4	88	41.9	-220	-175.2	-82	-31.0*
Turbidity	NTU	9.75	7.81	6.09	<i>NS</i>	8.7	<i>NS</i>	8.8	4.99	8.1	9.11	6.72	2.43	15.4	10.7*
Depth To Water	ft	10.51	10.56	9.19	<i>NS</i>	8.91	<i>NS</i>	15.98	15.12	9.6	9.71	10.21	9.34	18.66	18.63*

Parameters	Units	RWD-MWS		RWE-MWS		RWF-MWS		RWH-MWS		RWI-MWS		RWJ-MWS		RWK-MWS	
		Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22
pH	s.u.	4.55	6.25	7.54	6.59	4.29	4.67	5.26	7.1	6.47	<i>NS</i>	9.83	11.43	5.73	5.73
Specific Conductance	ms/cm	0.92	1.299	4.51	1.937	6.14	6.55	0.921	0.894	3.06	<i>NS</i>	2.34	3.459	0.969	1.17
Dissolved Oxygen	mg/L	NA	0.15	NA	0.16	NA	0.3	NA	0.1	NA	<i>NS</i>	NA	0.04	NA	0.28
ORP	mV	-65	-93.1	-193	-53.3	213	172.9	-128	-150.4	-116	<i>NS</i>	-52	-197.2	34	11.2
Turbidity	NTU	8.9	10.21	6.93	15.2	6.11	25.1	7.7	1.68	6.32	<i>NS</i>	7.61	1.79	9.1	3.59
Depth To Water	ft	13.65	12.42	12.77	12.63	13.42	11.05	10.74	10.07	10.05	<i>NS</i>	11.52	11.61	12.12	11.66

RWG-MWS	Units	RWL-MWS		RWN-MWS		RWO-MWS		RWQ-MWS		RWR-MWS		RWS-MWS	
		Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22
pH	s.u.	5.5	5.6	5.47	<i>NS</i>	7.14	7.59	4.88	6.33	5.58	5.3	4.77	6.36
Specific Conductance	ms/cm	1.62	0.922	2.35	<i>NS</i>	1.64	1.647	0.465	0.546	2.42	2.347	1.3	1.437
Dissolved Oxygen	mg/L	NA	0.38	NA	<i>NS</i>	NA	0.3	NA	0.05	NA	0.17	NA	0.14
ORP	mV	-63	52.8	41	<i>NS</i>	-150	-251.9	65	108	53	84	-92	-63.5
Turbidity	NTU	7.4	15	9.2	<i>NS</i>	9.54	11.18	8.69	4.94	6	10.76	6.11	6.5
Depth To Water	ft	11.85	11.57	12.2	<i>NS</i>	10.82	10.44	11.34	11.47	10.6	10.54	10.52	10.83

*Wells RW04-MWS, RW08-MWS, RW09-MWS, RW14-MWS, RW15-MWS, RW19-MWS, RW21-MWS, RW24-MWS, RW25-MWS, RWG-MWS, and RWM-MWS were not sampled during either event.*

**TABLE 7**  
**Intermediate Zinc Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RW01-MWI	RW02-MWI	RW03-MWI	RW03R-MWI	RW05-MWI	RW05R-MWI	RW06-MWI	RW07-MWI	RW08-MWI	RW09-MWI	RW10-MWI
2022 Sampling Frequency		Semiannually	Semiannually	NA	Semiannually	NA	Semiannually	Semiannually	Semiannually	Annually	Annually	Annually
4/1/2013	µg/L	DNE	DNE	DNE	DNE	136	DNE	2,970	DNE	DNE	DNE	DNE
10/1/2013	µg/L	DNE	DNE	DNE	DNE	247	DNE	4,720	DNE	DNE	DNE	DNE
6/1/2014	µg/L	DNE	DNE	DNE	DNE	2,180	DNE	5,480	DNE	DNE	DNE	DNE
11/1/2014	µg/L	DNE	DNE	DNE	DNE	592	DNE	7,660	DNE	DNE	DNE	DNE
5/1/2015	µg/L	DNE	DNE	DNE	DNE	1,300	DNE	5,090	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	NS	DNE	7,000	DNE	DNE	DNE	DNE
2/10/2017-2/16/2017	µg/L	DNE	DNE	9,740	DNE	NS	DNE	1,900	944	178	51,000	104,000
3/27/2017-3/30/2017	µg/L	DNE	DNE	9,240	DNE	NS	DNE	1,680	1,210	44.6	51,900	20.4
4/25/2017-4/28/2017	µg/L	DNE	DNE	7,830	DNE	NS	DNE	1,420	364	85	57,500	75,800
5/22/2017-5/24/2017	µg/L	DNE	DNE	2,960	DNE	NS	DNE	999	298	188	57,200	1,150
6/5/2017-6/9/2017	µg/L	DNE	DNE	2,440	DNE	374	DNE	876	432	71.9	51,900	34,600
7/10/2017-7/13/2017	µg/L	DNE	DNE	8,330	DNE	1,730	DNE	1,690	45.7	153	65,600	25,900
8/7/2017-8/10/2017	µg/L	11,600	18,200	10,900	DNE	1,730	DNE	1,340	62.7	49.8	55,500	79.7
9/1/2017-9/8/2017	µg/L	90	203	9,340	DNE	328	DNE	508	2,840	69.4	39,400	8,220
10/2/2017-10/9/2017	µg/L	13,700	290	1,810	DNE	349	DNE	615	23.4	16.9	49,700	31,000
11/3/2017-11/13/2017	µg/L	29	38.6	1,750	DNE	502	DNE	909	1,650	21.5	67,900	39,000
12/4/2017-12/8/2017	µg/L	41,000	186	6,270	DNE	205	DNE	1,360	39.8	21.4	44,500	158
1/2/2018-1/9/2018	µg/L	104	573	12,700	DNE	173	DNE	1,950	70.6	108	54,700	26.5
4/8/2018-4/13/2018	µg/L	576	452	6,920	DNE	402	DNE	27,900	756	1,050	38,400	13,500
7/30/2018-8/3/2018	µg/L	9,710	5,030	9,710	DNE	282	DNE	191	26,300	2,540	54,700	17,600
10/1/2018-10/5/2018	µg/L	143	3,240	13,000	DNE	110	DNE	90,100	12,200	256	53,800	16,600
12/10/2018-12/14/2018*	µg/L	3,880	25,300	14,900	DNE	177	DNE	99,600	86,000	11	66,600	2,520
3/12/2019-3/19/2019*	µg/L	2,460	21,500	6,720	DNE	7.5 J	DNE	122,000	24,200	10 U	57,500	591
5/3/2019-6/7/2019*	µg/L	5,670	56,600	13,300	DNE	Abandoned	66,800	108,000	136,000	10 U	64,200	5,560
9/10/2019-9/23/2019*	µg/L	5,940	72,000	10,500	DNE	Abandoned	71,700	122,000	48,300	11.2 B	53,300	7,730
12/3/2019-12/11/2019	µg/L	2,060	17,200	16,200	DNE	Abandoned	83,400	116,000	16,600	48.9	82,000	6,020
3/11/20-3/23/20*	µg/L	8,120	14,100	12,900	DNE	Abandoned	70,700	117,000	39,000	33.4	65,600	NS
6/8/20-6/30/20*	µg/L	13,700	34,900	19,400	DNE	Abandoned	76,600	94,400	400	4.5 J	77,800	940
9/9/20-9/29/20*	µg/L	3.7 J	123	Destroyed	DNE	Abandoned	80,000	111,000	NS	5.4 J	79,100	1,090
11/5/20-11/19/20*	µg/L	15,200	20,200	Destroyed	DNE	Abandoned	68,200	79.7	NS	28.3	73,700	550
5/26/21-6/18/21*	µg/L	26,600	104	Destroyed	DNE	Abandoned	79,000	109,000	NS	2.6 J	93,600	6,130
10/4/21-10/18/21*	µg/L	24,000	433	Destroyed	DNE	Abandoned	200 U	85,500	53,900	NS	NS	NS
11/29/21-11/30/21*	µg/L	NS	NS	Destroyed	DNE	Abandoned	50,700	NS	NS	NS	NS	NS
2/23/22-3/28/22*	µg/L	37,300	751	Destroyed	DNE	Abandoned	55,200	200 U	65,300	20 U	63,000	7,440
9/9/2022-9/15/2022*	µg/L	29,010	8,598	Destroyed	3,063	Abandoned	60,560	97,570	47,770	NS	NS	NS

**Bold indicates detection above the reporting limit**

NS = Not Sampled

DNE = Did Not Exist

\*Indicates concentrations are for dissolved metals. All other events show total metals.

**TABLE 7**  
**Intermediate Zinc Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RW11-MWI	RW12-MWI	RW13-MWI	RW15-MWI	RW16-MWI	RW18-MWI	RW19-MWI	RW21-MWI	RW22-MWI	RW22R-MWI
2022 Sampling Frequency		Annually	Semiannually	Annually	Annually	Annually	Annually	Annually	Annually	NA	Semiannually
4/1/2013	µg/L	<b>249,000</b>	<b>263,000</b>	DNE	DNE	DNE	<b>996,000</b>	DNE	DNE	NS	DNE
10/1/2013	µg/L	<b>284,000</b>	<b>201,000</b>	DNE	DNE	DNE	<b>85,400</b>	DNE	DNE	NS	DNE
6/1/2014	µg/L	<b>229,000</b>	<b>296,000</b>	DNE	DNE	DNE	<b>2,220,000</b>	DNE	DNE	NS	DNE
11/1/2014	µg/L	<b>250,000</b>	<b>295,000</b>	DNE	DNE	DNE	<b>1,890,000</b>	DNE	DNE	NS	DNE
5/1/2015	µg/L	<b>1,120,000</b>	<b>291,000</b>	DNE	DNE	DNE	<b>708,000</b>	DNE	DNE	NS	DNE
11/1/2015	µg/L	NS	<b>387,000</b>	DNE	DNE	DNE	<b>576,000</b>	DNE	DNE	NS	DNE
2/10/2017-2/16/2017	µg/L	<b>368,000</b>	<b>249,000</b>	DNE	DNE	DNE	<b>728,000</b>	<b>5,900,000</b>	DNE	NS	DNE
3/27/2017-3/30/2017	µg/L	<b>301,000</b>	<b>216,000</b>	DNE	DNE	DNE	<b>592,000</b>	<b>4,650,000</b>	DNE	NS	DNE
4/25/2017-4/28/2017	µg/L	<b>288,000</b>	<b>188,000</b>	DNE	DNE	DNE	<b>633,000</b>	<b>7,010,000</b>	DNE	NS	DNE
5/22/2017-5/24/2017	µg/L	<b>336,000</b>	<b>232,000</b>	DNE	DNE	DNE	<b>246,000</b>	<b>5,370,000</b>	DNE	NS	DNE
6/5/2017-6/9/2017	µg/L	<b>201,000</b>	<b>226,000</b>	DNE	DNE	DNE	<b>694,000</b>	<b>6,720,000</b>	DNE	<b>303</b>	DNE
7/10/2017-7/13/2017	µg/L	<b>192,000</b>	<b>219,000</b>	DNE	DNE	DNE	<b>575,000</b>	<b>5,330,000</b>	DNE	<b>103</b>	DNE
8/7/2017-8/10/2017	µg/L	<b>147,000</b>	<b>156,000</b>	<b>308,000</b>	<b>3,210</b>	DNE	<b>290,000</b>	<b>3,360,000</b>	DNE	NS	DNE
9/1/2017-9/8/2017	µg/L	<b>134,000</b>	<b>156,000</b>	<b>1,160</b>	<b>71.1</b>	<b>20,200</b>	<b>382,000</b>	<b>2,500,000</b>	DNE	<b>43,000</b>	DNE
10/2/2017-10/9/2017	µg/L	<b>111,000</b>	<b>150,000</b>	<b>204,000</b>	<b>295</b>	<b>2,000</b>	<b>393,000</b>	<b>3,670,000</b>	DNE	<b>16,100</b>	DNE
11/3/2017-11/13/2017	µg/L	<b>207,000</b>	<b>140,000</b>	<b>172,000</b>	<b>825</b>	<b>441</b>	<b>323,000</b>	<b>3,400,000</b>	DNE	<b>3,700</b>	DNE
12/4/2017-12/8/2017	µg/L	<b>197,000</b>	<b>157,000</b>	<b>237</b>	<b>1,070</b>	<b>19,200</b>	<b>369,000</b>	<b>3,970,000</b>	DNE	<b>19,500</b>	DNE
1/2/2018-1/9/2018	µg/L	<b>225,000</b>	<b>117,000</b>	<b>8,600</b>	<b>5,540</b>	<b>16,200</b>	<b>370,000</b>	<b>3,840,000</b>	DNE	<b>27,200</b>	DNE
4/8/2018-4/13/2018	µg/L	<b>215,000</b>	<b>103,000</b>	<b>201,000</b>	<b>252</b>	<b>11,200</b>	<b>396,000</b>	<b>4,190,000</b>	DNE	<b>44,700</b>	DNE
7/30/2018-8/3/2018	µg/L	<b>15,700</b>	<b>2,410</b>	<b>274,000</b>	<b>18,600</b>	<b>1,230</b>	<b>330,000</b>	<b>4,880,000</b>	DNE	<b>73,300</b>	DNE
10/1/2018-10/5/2018	µg/L	<b>174,000</b>	<b>14,300</b>	<b>33.4</b>	<b>736</b>	<b>320</b>	<b>247,000</b>	<b>5,880,000</b>	DNE	<b>47,100</b>	DNE
12/10/2018-12/14/2018*	µg/L	<b>176,000</b>	<b>109,000</b>	<b>116</b>	<b>6,540</b>	<b>6 J</b>	<b>318,000</b>	<b>7,580,000</b>	DNE	<b>68,100</b>	DNE
3/12/2019-3/19/2019*	µg/L	<b>142,000</b>	<b>110,000</b>	<b>328,000</b>	<b>109,000</b>	<b>4.7 J</b>	<b>822,000</b>	<b>3,770,000</b>	DNE	<b>81,100</b>	DNE
5/3/2019-6/7/2019*	µg/L	<b>121,000</b>	<b>111,000</b>	<b>97.7</b>	<b>16,400</b>	<b>4.9 J</b>	<b>279,000</b>	<b>7,280,000</b>	<b>624,000</b>	NS	<b>1,030</b>
9/10/2019-9/23/2019*	µg/L	<b>120,000</b>	<b>104,000</b>	<b>122</b>	<b>168,000</b>	<b>13.1</b>	<b>640,000</b>	<b>3,460,000</b>	<b>570,000</b>	NS	<b>983</b>
12/3/2019-12/11/2019	µg/L	<b>173,000</b>	<b>43,500</b>	<b>246,000</b>	<b>179,000</b>	<b>22.7</b>	<b>849,000</b>	<b>5,690,000</b>	<b>539,000</b>	NS	<b>3,000</b>
3/11/20-3/23/20*	µg/L	<b>151,000</b>	NS	<b>250,000</b>	<b>17.9</b>	<b>16.2</b>	<b>545,000</b>	<b>6,050,000</b>	<b>648,000</b>	Abandoned	<b>1,810</b>
6/8/20-6/30/20*	µg/L	<b>128,000</b>	<b>86,400</b>	<b>27</b>	<b>5.8 J</b>	<b>7.3 J</b>	<b>252,000</b>	<b>6,450,000</b>	<b>470,000</b>	Abandoned	<b>4,350</b>
9/9/20-9/29/20*	µg/L	NS	NS	<b>296,000</b>	<b>3,210</b>	<b>63.1</b>	<b>753,000</b>	<b>6,220,000</b>	<b>536,000</b>	Abandoned	<b>5,340</b>
11/5/20-11/19/20*	µg/L	<b>166,000</b>	NS	<b>19.8</b>	<b>137</b>	<b>10.2</b>	<b>534,000</b>	<b>3,930,000</b>	<b>562,000</b>	Abandoned	<b>4,520</b>
5/26/21-6/18/21*	µg/L	<b>188,000</b>	NS	<b>363,000</b>	<b>16,400</b>	<b>62.4</b>	<b>4,380</b>	<b>212,000</b>	<b>527,000</b>	Abandoned	<b>7,730</b>
10/4/21-10/18/21*	µg/L	NS	NS	NS	NS	NS	NS	NS	NS	Abandoned	<b>9,800</b>
11/29/21-11/30/21*	µg/L	NS	NS	NS	NS	NS	NS	NS	NS	Abandoned	NS
2/23/22-3/28/22*	µg/L	<b>141,000</b>	<b>81,000</b>	<b>435,000</b>	<b>49,300</b>	<b>120</b>	<b>434,000</b>	<b>3,090,000</b>	<b>5,070,000</b>	Abandoned	<b>21,700</b>
9/9/2022-9/15/2022*	µg/L	NS	<b>99,550</b>	NS	NS	NS	NS	NS	NS	Abandoned	<b>38,920</b>

**Bold indicates detection above the reporting limit**

NS = Not Sampled

DNE = Did Not Exist

\*Indicates concentrations are for dissolved metals. All other events show total metals.

**TABLE 7**  
**Intermediate Zinc Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RW23-MWI	RW24-MWI	RW25-MWI	RWA-MWI	RWB-MWI	RWD-MWI	RWE-MWI	RWF-MWI	RWG-MWI	RWH-MWI
2022 Sampling Frequency		Semiannually	Annually	Annually	Semiannually	Semiannually	Semiannually	Semiannually	Semiannually	Annually	Semiannually
4/1/2013	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2013	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/1/2014	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2014	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/16/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/27/2017-3/30/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/25/2017-4/28/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/22/2017-5/24/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/5/2017-6/9/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/10/2017-7/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
8/7/2017-8/10/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
9/1/2017-9/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/2/2017-10/9/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/3/2017-11/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/4/2017-12/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
1/2/2018-1/9/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/8/2018-4/13/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/30/2018-8/3/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2018-10/5/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/10/2018-12/14/2018*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/12/2019-3/19/2019*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/3/2019-6/7/2019*	µg/L	<b>109,000</b>	<b>650,000</b>	<b>413,000</b>	<b>375,000</b>	<b>18</b>	<b>36,200</b>	<b>112,000</b>	<b>41,900</b>	<b>332</b>	<b>226,000</b>
9/10/2019-9/23/2019*	µg/L	<b>125,000</b>	<b>635,000</b>	<b>7,000</b>	<b>349,000</b>	<b>29.2</b>	<b>41,900</b>	<b>109,000</b>	<b>42,300</b>	<b>291</b>	<b>378,000</b>
12/3/2019-12/11/2019	µg/L	<b>111,000</b>	<b>538,000</b>	<b>462,000</b>	<b>396,000</b>	<b>47.8</b>	<b>52,600</b>	<b>118,000</b>	<b>58,800</b>	<b>362</b>	<b>502,000</b>
3/11/20-3/23/20*	µg/L	<b>100,000</b>	<b>466,000</b>	<b>355,000</b>	<b>521,000</b>	<b>8.9 J</b>	<b>50,400</b>	<b>102,000</b>	<b>90,400</b>	<b>411</b>	<b>406,000</b>
6/8/20-6/30/20*	µg/L	<b>116,000</b>	<b>378,000</b>	<b>443,000</b>	<b>441,000</b>	<b>8.4 J</b>	<b>59,300</b>	<b>114,000</b>	<b>108,000</b>	<b>465</b>	<b>474,000</b>
9/9/20-9/29/20*	µg/L	<b>105,000</b>	<b>364,000</b>	<b>477,000</b>	<b>452,000</b>	<b>15.2</b>	<b>69,300</b>	<b>110,000</b>	<b>134,000</b>	<b>545</b>	<b>477,000</b>
11/5/20-11/19/20*	µg/L	<b>95,600</b>	<b>258,000</b>	<b>445,000</b>	<b>406,000</b>	<b>13.5</b>	<b>64,200</b>	<b>80,800</b>	<b>110,000</b>	<b>522</b>	<b>618,000</b>
5/26/21-6/18/21*	µg/L	<b>124,000</b>	<b>292,000</b>	<b>338,000</b>	<b>468,000</b>	<b>13.6</b>	<b>81,900</b>	<b>102,000</b>	<b>133,000</b>	<i>NS</i>	<b>578,000</b>
10/4/21-10/18/21*	µg/L	<b>110,000</b>	<i>NS</i>	<i>NS</i>	<b>328,000</b>	<b>19.1 J</b>	<b>53,400</b>	<b>68,000</b>	<b>82,500</b>	<i>NS</i>	<b>388,000</b>
11/29/21-11/30/21*	µg/L	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<b>319</b>	<i>NS</i>
2/23/22-3/28/22*	µg/L	<b>85,000</b>	<b>263,000</b>	<b>376,000</b>	<b>415,000</b>	<b>16.7</b>	<b>47,200</b>	<b>62,700</b>	<b>86,800</b>	<b>1,090</b>	<b>287,000</b>
9/9/2022-9/15/2022*	µg/L	<b>1,113,200</b>	<i>NS</i>	<i>NS</i>	<b>340,500</b>	<b>18.9</b>	<b>49,020</b>	<b>58,890</b>	<b>89,070</b>	<i>NS</i>	<b>328,000</b>

**Bold indicates detection above the reporting limit**

NS = Not Sampled

DNE = Did Not Exist

\*Indicates concentrations are for dissolved metals. All other events show total metals.

**TABLE 7**  
**Intermediate Zinc Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RWI-MWI	RWJ-MWI	RWK-MWI	RWL-MWI	RWM-MWI	RWO-MWI	RWP-MWI	RWQ-MWI	RWR-MWI	RWS-MWI
2022 Sampling Frequency		Annually	Semiannually	Semiannually	Semiannually	Annually	Semiannually	Semiannually	Semiannually	Semiannually	Semiannually
4/1/2013	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2013	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/1/2014	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2014	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/16/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/27/2017-3/30/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/25/2017-4/28/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/22/2017-5/24/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/5/2017-6/9/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/10/2017-7/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
8/7/2017-8/10/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
9/1/2017-9/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/2/2017-10/9/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/3/2017-11/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/4/2017-12/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
1/2/2018-1/9/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/8/2018-4/13/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/30/2018-8/3/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2018-10/5/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/10/2018-12/14/2018*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/12/2019-3/19/2019*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/3/2019-6/7/2019*	µg/L	<b>632,000</b>	<b>1,580</b>	<b>21,100</b>	<b>169,000</b>	<b>162,000</b>	<b>249,000</b>	<b>3,210,000</b>	<b>357,000</b>	<b>2,560,000</b>	<b>797,000</b>
9/10/2019-9/23/2019*	µg/L	<b>519,000</b>	<b>2,150</b>	<b>25,100</b>	<b>142,000</b>	<b>159,000</b>	<b>214,000</b>	<b>3,570,000</b>	<b>270,000</b>	<b>3,620,000</b>	<b>1,040,000</b>
12/3/2019-12/11/2019	µg/L	<b>554,000</b>	<b>3,140</b>	<b>21,600</b>	<b>124,000</b>	<b>152,000</b>	<b>204,000</b>	<b>3,880,000</b>	<b>258,000</b>	<b>4,050,000</b>	<b>946,000</b>
3/11/20-3/23/20*	µg/L	<b>875,000</b>	<b>3,430</b>	<b>30,300</b>	<b>121,000</b>	<b>139,000</b>	<b>202,000</b>	<b>3,860,000</b>	<b>312,000</b>	<b>814,000</b>	<b>1,070,000</b>
6/8/20-6/30/20*	µg/L	<b>775,000</b>	<b>805</b>	<b>21,400</b>	<b>96,300</b>	<b>128,000</b>	<b>223,000</b>	<b>3,160,000</b>	<b>255,000</b>	<b>2,530,000</b>	<b>74,300</b>
9/9/20-9/29/20*	µg/L	NS	<b>744</b>	<b>36,800</b>	<b>116,000</b>	<b>138,000</b>	<b>204,000</b>	<b>3,810,000</b>	<b>280,000</b>	<b>1,830,000</b>	<b>760,000</b>
11/5/20-11/19/20*	µg/L	NS	<b>1,060</b>	<b>26,500</b>	<b>126,000</b>	<b>125,000</b>	<b>155,000</b>	<b>3,520,000</b>	<b>257,000</b>	<b>996,000</b>	<b>919,000</b>
5/26/21-6/18/21*	µg/L	<b>542,000</b>	<b>1,990</b>	<b>34,600</b>	<b>110,000</b>	<b>150,000</b>	<b>208,000</b>	<b>3,990,000</b>	<b>286,000</b>	<b>1,400,000</b>	<b>858,000</b>
10/4/21-10/18/21*	µg/L	NS	<b>2,840</b>	<b>23,700</b>	<b>97,000</b>	NS	<i>200 U</i>	<b>14,300</b>	<b>256,000</b>	<b>48,000</b>	<b>649,000</b>
11/29/21-11/30/21*	µg/L	NS	NS	NS	NS	NS	<b>1,380</b>	<b>526</b>	NS	NS	NS
2/23/22-3/28/22*	µg/L	<b>424,000</b>	<b>6,330</b>	<b>19,600</b>	<b>75,200</b>	<b>94,900</b>	<b>114,000</b>	<b>2,530,000</b>	<b>221,000</b>	<b>599,000</b>	<b>633,000</b>
9/9/2022-9/15/2022*	µg/L	NS	<b>1,325</b>	<b>16,940</b>	<b>79,440</b>	NS	<b>180,000</b>	<b>2,709,000</b>	<b>216,500</b>	<b>912,000</b>	<b>228,900</b>

**Bold indicates detection above the reporting limit**

NS = Not Sampled

DNE = Did Not Exist

\*Indicates concentrations are for dissolved metals. All other events show total metals.

**TABLE 8**  
**Intermediate Cadmium Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RW01-MWI	RW02-MWI	RW03-MWI	RW03R-MWI	RW05-MWI	RW05R-MWI	RW06-MWI	RW07-MWI	RW08-MWI	RW09-MWI	RW10-MWI
2022 Sampling Frequency		Semiannually	Semiannually	NA	Semiannually	NA	Semiannually	Semiannually	Semiannually	Annually	Annually	Annually
4/1/2013	µg/L	DNE	DNE	DNE	DNE	<b>0.75</b>	DNE	<b>13.1</b>	DNE	DNE	DNE	DNE
10/1/2013	µg/L	DNE	DNE	DNE	DNE	<b>1.2</b>	DNE	<b>24.8</b>	DNE	DNE	DNE	DNE
6/1/2014	µg/L	DNE	DNE	DNE	DNE	<b>4.1</b>	DNE	<b>63.2</b>	DNE	DNE	DNE	DNE
11/1/2014	µg/L	DNE	DNE	DNE	DNE	<b>1.8</b>	DNE	<b>40.9</b>	DNE	DNE	DNE	DNE
5/1/2015	µg/L	DNE	DNE	DNE	DNE	<b>13.3</b>	DNE	<b>27.6</b>	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	NS	DNE	<b>41.9</b>	DNE	DNE	DNE	DNE
2/10/2017-2/16/2017	µg/L	DNE	DNE	<b>189</b>	DNE	NS	DNE	<b>12.5</b>	<b>1.2 J</b>	<b>0.49 J</b>	<b>3.1</b>	<b>446</b>
3/27/2017-3/30/2017	µg/L	DNE	DNE	<b>196</b>	DNE	NS	DNE	<b>9.2</b>	<b>4.6</b>	<b>0.39 J</b>	<b>4</b>	<i>3 U</i>
4/25/2017-4/28/2017	µg/L	DNE	DNE	<b>192</b>	DNE	NS	DNE	<b>14</b>	<i>3 U</i>	<i>3 U</i>	<b>5</b>	<b>198</b>
5/22/2017-5/24/2017	µg/L	DNE	DNE	<b>84</b>	DNE	NS	DNE	<b>20.4</b>	<b>1.1 J</b>	<b>1.5 J</b>	<b>11.1</b>	<b>2.5 J</b>
6/5/2017-6/9/2017	µg/L	DNE	DNE	<b>37.4</b>	DNE	<b>1.9 J</b>	DNE	<b>14.3</b>	<b>0.91 J</b>	<b>0.48 J</b>	<b>8.1</b>	<b>27.2</b>
7/10/2017-7/13/2017	µg/L	DNE	DNE	<b>138</b>	DNE	<b>17.5</b>	DNE	<b>10.2</b>	<b>1.2 J</b>	<b>1.3 J</b>	<b>12.9</b>	<b>16.3</b>
8/7/2017-8/10/2017	µg/L	<b>194</b>	<b>511</b>	<b>227</b>	DNE	<b>19.3</b>	DNE	<b>10.1</b>	<b>1 J</b>	<b>0.86 J</b>	<b>18.5</b>	<i>3 U</i>
9/1/2017-9/8/2017	µg/L	<b>0.51 J</b>	<b>3 J</b>	<b>214</b>	DNE	<b>3.7</b>	DNE	<b>4.5</b>	<b>11</b>	<b>0.77 J</b>	<b>9.1</b>	<b>17.7</b>
10/2/2017-10/9/2017	µg/L	<b>145</b>	<b>2.4 J</b>	<b>20.2</b>	DNE	<b>4.2</b>	DNE	<b>4.2</b>	<i>3 U</i>	<i>3 U</i>	<b>12</b>	<b>24.6</b>
11/3/2017-11/13/2017	µg/L	<i>3 U</i>	<i>3 U</i>	<b>25.2</b>	DNE	<b>4.9</b>	DNE	<b>5.4</b>	<b>5.1</b>	<b>0.88 J</b>	<b>8.8</b>	<b>63.7</b>
12/4/2017-12/8/2017	µg/L	<b>37.5</b>	<b>2.3 J</b>	<b>154</b>	DNE	<b>2.7 J</b>	DNE	<b>7.1</b>	<b>1.7 J</b>	<b>1.8 J</b>	<b>7.7</b>	<i>3 U</i>
1/2/2018-1/9/2018	µg/L	<b>2.4 J</b>	<b>14.5</b>	<b>259</b>	DNE	<b>2.2 J</b>	DNE	<b>8.4</b>	<i>3 U</i>	<i>3 U</i>	<b>2.1 J</b>	<i>3 U</i>
4/8/2018-4/13/2018	µg/L	<b>16.5</b>	<b>3</b>	<b>128</b>	DNE	<b>2.6 J</b>	DNE	<b>89.2</b>	<b>1.3 J</b>	<b>6.2</b>	<b>1.8 J</b>	<b>44.4</b>
7/30/2018-8/3/2018	µg/L	<b>250</b>	<b>79.9</b>	<b>236</b>	DNE	<b>1.3 J</b>	DNE	<i>3 U</i>	<b>52.9</b>	<b>14.1</b>	<i>3 U</i>	<b>44.7</b>
10/1/2018-10/5/2018	µg/L	<i>3 U</i>	<b>18</b>	<b>346</b>	DNE	<i>3 U</i>	DNE	<b>629</b>	<b>28.7</b>	<b>0.92 J</b>	<b>3.7</b>	<b>10.8</b>
12/10/2018-12/14/2018*	µg/L	<b>9.3</b>	<b>191</b>	<b>342</b>	DNE	<b>0.76 J</b>	DNE	<b>752</b>	<b>344</b>	<i>3 U</i>	<b>0.96 J</b>	<i>3 U</i>
3/12/2019-3/19/2019*	µg/L	<i>3 U</i>	<b>98.3</b>	<b>213</b>	DNE	<i>3 U</i>	DNE	<b>876</b>	<b>29.5</b>	<i>3 U</i>	<b>2 J</b>	<b>0.38 J</b>
5/3/2019-6/7/2019*	µg/L	<b>19.4</b>	<b>785</b>	<b>449</b>	DNE	Abandoned	<b>2,570</b>	<b>885</b>	<b>453</b>	<i>3 U</i>	<b>3.8</b>	<b>0.86 J</b>
9/10/2019-9/23/2019*	µg/L	<b>20.6</b>	<b>873</b>	<b>344</b>	DNE	Abandoned	<b>2,820</b>	<b>793</b>	<b>48.7</b>	<i>3.0 U</i>	<b>5.6</b>	<b>8.4</b>
12/3/2019-12/11/2019	µg/L	<b>8.8</b>	<b>277</b>	<b>546</b>	DNE	Abandoned	<b>2,700</b>	<b>673</b>	<b>38.1</b>	<b>0.59 J</b>	<i>4.2 B</i>	<b>13.9</b>
3/11/20-3/23/20*	µg/L	<b>49.3</b>	<b>136</b>	<b>451</b>	DNE	Abandoned	<b>1,960</b>	<b>690</b>	<b>36</b>	<i>3 U</i>	<b>10.6</b>	NS
6/8/20-6/30/20*	µg/L	<b>117</b>	<b>398</b>	<b>581</b>	DNE	Abandoned	<b>1,930</b>	<b>582</b>	<b>1.7 J</b>	<b>0.47 J</b>	<b>16.5</b>	<b>0.67 J</b>
9/9/20-9/29/20*	µg/L	<i>3 U</i>	<b>0.69 J</b>	Destroyed	DNE	Abandoned	<b>1,650</b>	<b>530</b>	NS	<b>0.39 J</b>	<b>10.7</b>	<b>0.77 J</b>
11/5/20-11/19/20*	µg/L	<b>162</b>	<b>208</b>	Destroyed	DNE	Abandoned	<b>1,790</b>	<b>0.66 J</b>	NS	<b>0.56 J</b>	<b>10.3</b>	<b>0.55 J</b>
5/26/21-6/18/21*	µg/L	<b>277</b>	<b>0.58 J</b>	Destroyed	DNE	Abandoned	<b>1,570</b>	<b>616</b>	NS	<b>0.38 J</b>	<b>16</b>	<b>11.1</b>
10/4/21-10/18/21*	µg/L	<b>322</b>	<i>1 U</i>	Destroyed	DNE	Abandoned	<b>1,470</b>	<b>604</b>	<b>49.1</b>	NS	NS	NS
11/29/21-11/30/21*	µg/L	NS	NS	Destroyed	DNE	Abandoned	<b>16.8</b>	NS	NS	NS	NS	NS
2/23/22-3/28/22	µg/L	<b>565</b>	<i>2 U</i>	Destroyed	DNE	Abandoned	<b>1,660</b>	<b>626</b>	<b>107</b>	<i>200 U</i>	<i>2 U</i>	<b>13.3</b>
9/9/2022-9/15/2022*	µg/L	<b>574.1</b>	<b>17.42</b>	Destroyed	<b>9.595</b>	Abandoned	<b>1,243</b>	<b>610.6</b>	<b>42.71</b>	NS	NS	NS

**Bold indicates detection above the reporting limit**

NS = Not Sampled

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**TABLE 8**  
**Intermediate Cadmium Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RW11-MWI	RW12-MWI	RW13-MWI	RW15-MWI	RW16-MWI	RW18-MWI	RW19-MWI	RW21-MWI	RW22-MWI	RW22R-MWI
2022 Sampling Frequency		Annually	Semiannually	Annually	Annually	Annually	Annually	Annually	Annually	NA	Semiannually
4/1/2013	µg/L	<b>438</b>	<b>4,300</b>	DNE	DNE	DNE	<b>73.1</b>	DNE	DNE	NS	DNE
10/1/2013	µg/L	<b>903</b>	<b>3,500</b>	DNE	DNE	DNE	<b>59.4</b>	DNE	DNE	NS	DNE
6/1/2014	µg/L	<b>361</b>	<b>4,740</b>	DNE	DNE	DNE	<b>134</b>	DNE	DNE	NS	DNE
11/1/2014	µg/L	<b>405</b>	<b>5,090</b>	DNE	DNE	DNE	<b>138</b>	DNE	DNE	NS	DNE
5/1/2015	µg/L	<b>25,000</b>	<b>6,000</b>	DNE	DNE	DNE	<b>113</b>	DNE	DNE	NS	DNE
11/1/2015	µg/L	NS	<b>9,780</b>	DNE	DNE	DNE	<b>47.2</b>	DNE	DNE	NS	DNE
2/10/2017-2/16/2017	µg/L	<b>1,690</b>	<b>4,740</b>	DNE	DNE	DNE	<b>70.3</b>	<b>3,760</b>	DNE	NS	DNE
3/27/2017-3/30/2017	µg/L	<b>1,490</b>	<b>3,530</b>	DNE	DNE	DNE	<b>63.8</b>	<b>3,450</b>	DNE	NS	DNE
4/25/2017-4/28/2017	µg/L	<b>1,800</b>	<b>2,730</b>	DNE	DNE	DNE	<b>119</b>	<b>3,380</b>	DNE	NS	DNE
5/22/2017-5/24/2017	µg/L	<b>2,600</b>	<b>3,820</b>	DNE	DNE	DNE	<b>92</b>	<b>2,770</b>	DNE	NS	DNE
6/5/2017-6/9/2017	µg/L	<b>218</b>	<b>2,260</b>	DNE	DNE	DNE	<b>65.1</b>	<b>2,280</b>	DNE	<b>0.35 J</b>	DNE
7/10/2017-7/13/2017	µg/L	<b>518</b>	<b>2,730</b>	DNE	DNE	DNE	<b>61.7</b>	<b>2,550</b>	DNE	3 U	DNE
8/7/2017-8/10/2017	µg/L	<b>163</b>	<b>2,220</b>	<b>31,800</b>	<b>10.1</b>	DNE	<b>74.4</b>	<b>1,670</b>	DNE	NS	DNE
9/1/2017-9/8/2017	µg/L	<b>274</b>	<b>1,820</b>	<b>66</b>	3 U	<b>1.7 J</b>	<b>72.2</b>	<b>1,320</b>	DNE	<b>2.3 J</b>	DNE
10/2/2017-10/9/2017	µg/L	<b>125</b>	<b>1,510</b>	<b>28,700</b>	3 U	3 U	<b>43.7</b>	<b>1,710</b>	DNE	3 U	DNE
11/3/2017-11/13/2017	µg/L	<b>1,460</b>	<b>1,380</b>	<b>24,500</b>	3 U	3 U	<b>66.6</b>	<b>1,770</b>	DNE	<b>3.8</b>	DNE
12/4/2017-12/8/2017	µg/L	<b>1,380</b>	<b>1,450</b>	<b>44.2</b>	<b>0.97 J</b>	<b>1.9 J</b>	<b>51.5</b>	<b>1,710</b>	DNE	<b>15.2</b>	DNE
1/2/2018-1/9/2018	µg/L	<b>1,400</b>	<b>1,270</b>	<b>1,240</b>	<b>1.6 J</b>	<b>1.2 J</b>	<b>63.5</b>	<b>1,880</b>	DNE	<b>4.1</b>	DNE
4/8/2018-4/13/2018	µg/L	<b>1,660</b>	<b>121</b>	<b>19,400</b>	3 U	<b>1.1 J</b>	<b>55.8</b>	<b>1,700</b>	DNE	3 U	DNE
7/30/2018-8/3/2018	µg/L	<b>4.7</b>	<b>134</b>	<b>21,000</b>	<b>15.3</b>	3 U	<b>35.1</b>	<b>1,560</b>	DNE	3 U	DNE
10/1/2018-10/5/2018	µg/L	<b>133</b>	<b>86.3</b>	<b>12.6</b>	3 U	3 U	<b>14.5</b>	<b>1,610</b>	DNE	3 U	DNE
12/10/2018-12/14/2018*	µg/L	<b>1,160</b>	<b>1,220</b>	<b>3.2</b>	<b>12.9</b>	3 U	<b>44.7</b>	<b>1,900</b>	DNE	3 U	DNE
3/12/2019-3/19/2019*	µg/L	<b>98.9</b>	<b>768</b>	<b>29,200</b>	<b>402</b>	3 U	<b>80.3</b>	<b>1,320</b>	DNE	3 U	DNE
5/3/2019-6/7/2019*	µg/L	<b>586</b>	<b>1,520</b>	<b>51.1</b>	<b>64.2</b>	3 U	<b>38.0</b>	<b>2,420</b>	<b>50.2</b>	NS	3 U
9/10/2019-9/23/2019*	µg/L	<b>517</b>	<b>1,780</b>	<b>12.8</b>	<b>589</b>	3.0 U	<b>50.4</b>	<b>1,580</b>	<b>23</b>	NS	3.0 U
12/3/2019-12/11/2019	µg/L	<b>476</b>	<b>420</b>	<b>22,500</b>	<b>605</b>	<b>0.36 J</b>	<b>87.6</b>	<b>1,500</b>	<b>33.1</b>	NS	3.0 U
3/11/20-3/23/20*	µg/L	<b>365</b>	NS	<b>24,700</b>	<b>0.5 J</b>	<b>0.36 J</b>	<b>36.8</b>	<b>1,400</b>	<b>39.8</b>	Abandoned	3 U
6/8/20-6/30/20*	µg/L	<b>75.1</b>	<b>716</b>	<b>15.4</b>	3 U	3 U	<b>16</b>	<b>3,390</b>	<b>34</b>	Abandoned	<b>2 J</b>
9/9/20-9/29/20*	µg/L	NS	NS	<b>23,900</b>	<b>8</b>	3 U	<b>43.1</b>	<b>1,630</b>	<b>29.4</b>	Abandoned	<b>2.4 J</b>
11/5/20-11/19/20*	µg/L	<b>179</b>	NS	<b>6.1</b>	<b>0.91 J</b>	3 U	<b>42.1</b>	<b>1,540</b>	<b>27.8</b>	Abandoned	<b>1.6 J</b>
5/26/21-6/18/21*	µg/L	<b>175</b>	NS	<b>26,400</b>	<b>43.6</b>	<b>0.42 J</b>	3 U	<b>112</b>	<b>34.2</b>	Abandoned	<b>3.4</b>
10/4/21-10/18/21*	µg/L	NS	NS	NS	NS	NS	NS	NS	NS	Abandoned	<b>2.5 J</b>
11/29/21-11/30/21*	µg/L	NS	NS	NS	NS	NS	NS	NS	NS	Abandoned	NS
2/23/22-3/28/22	µg/L	<b>194</b>	<b>1,080</b>	<b>23,700</b>	<b>169</b>	2 U	<b>31.7</b>	<b>109</b>	<b>32.7</b>	Abandoned	<b>3.4</b>
9/9/2022-9/15/2022*	µg/L	NS	<b>1,396</b>	NS	NS	NS	NS	NS	NS	Abandoned	<b>5.722</b>

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**Intermediate Cadmium Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RW23-MWI	RW24-MWI	RW25-MWI	RWA-MWI	RWB-MWI	RWD-MWI	RWE-MWI	RWF-MWI	RWG-MWI	RWH-MWI
2022 Sampling Frequency		Semiannually	Annually	Annually	Semiannually	Semiannually	Semiannually	Semiannually	Semiannually	Annually	Semiannually
4/1/2013	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2013	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/1/2014	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2014	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/16/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/27/2017-3/30/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/25/2017-4/28/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/22/2017-5/24/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/5/2017-6/9/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/10/2017-7/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
8/7/2017-8/10/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
9/1/2017-9/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/2/2017-10/9/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/3/2017-11/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/4/2017-12/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
1/2/2018-1/9/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/8/2018-4/13/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/30/2018-8/3/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2018-10/5/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/10/2018-12/14/2018*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/12/2019-3/19/2019*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/3/2019-6/7/2019*	µg/L	<b>2,270</b>	<b>1,580</b>	<b>507</b>	<b>6,830</b>	<i>3 U</i>	<b>395</b>	<b>700</b>	<b>859</b>	<b>23</b>	<b>92</b>
9/10/2019-9/23/2019*	µg/L	<b>2,800</b>	<b>1,540</b>	<b>9.9</b>	<b>7,740</b>	<i>3.0 U</i>	<b>514</b>	<b>656</b>	<b>1,020</b>	<b>15.4</b>	<b>1,380</b>
12/3/2019-12/11/2019	µg/L	<b>2,680</b>	<b>1,250</b>	<b>622</b>	<b>9,020</b>	<i>3.0 U</i>	<b>586</b>	<b>707</b>	<b>1,340</b>	<b>26.0</b>	<b>3,580</b>
3/11/20-3/23/20*	µg/L	<b>2,600</b>	<b>1,190</b>	<b>633</b>	<b>12,600</b>	<i>3 U</i>	<b>555</b>	<b>664</b>	<b>2,010</b>	<b>38.2</b>	<b>3,210</b>
6/8/20-6/30/20*	µg/L	<b>2,740</b>	<b>1,050</b>	<b>652</b>	<b>10,200</b>	<i>3 U</i>	<b>515</b>	<b>609</b>	<b>2,580</b>	<b>26.7</b>	<b>4,610</b>
9/9/20-9/29/20*	µg/L	<b>2,500</b>	<b>922</b>	<b>708</b>	<b>7,630</b>	<b>0.59 J</b>	<b>541</b>	<b>584</b>	<b>3,170</b>	<b>38.2</b>	<b>4,330</b>
11/5/20-11/19/20*	µg/L	<b>2,340</b>	<b>842</b>	<b>703</b>	<b>10,100</b>	<i>3 U</i>	<b>596</b>	<b>527</b>	<b>3,330</b>	<b>40.0</b>	<b>6,650</b>
5/26/21-6/18/21*	µg/L	<b>2,870</b>	<b>890</b>	<b>626</b>	<b>11,700</b>	<b>0.34 J</b>	<b>713</b>	<b>530</b>	<b>3,710</b>	<i>NS</i>	<b>6,760</b>
10/4/21-10/18/21*	µg/L	<b>2,590</b>	<i>NS</i>	<i>NS</i>	<b>8,510</b>	<i>1 U</i>	<b>536</b>	<b>497</b>	<b>2,610</b>	<i>NS</i>	<b>4,220</b>
11/29/21-11/30/21*	µg/L	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<b>1.8</b>	<i>NS</i>
2/23/22-3/28/22	µg/L	<b>2,610</b>	<b>1,200</b>	<b>926</b>	<b>9,840</b>	<i>2 U</i>	<b>567</b>	<b>438</b>	<b>2,590</b>	<b>8.6</b>	<b>5,150</b>
9/9/2022-9/15/2022*	µg/L	<b>2,844</b>	<i>NS</i>	<i>NS</i>	<b>8,587</b>	<b>0.062 J</b>	<b>487.9</b>	<b>398.8</b>	<b>2,263</b>	<i>NS</i>	<b>2,520</b>

**Bold indicates detection above the reporting limit**

NS = Not Sampled

DNE = Did Not Exist

\*Indicates concentrations are for dissolved metals. All other events show total metals.

**TABLE 8**  
**Intermediate Cadmium Concentrations**  
**Rod Wire Mill Interim Measures Progress Report**

Sampling Dates	Units	RWI-MWI	RWJ-MWI	RWK-MWI	RWL-MWI	RWM-MWI	RWO-MWI	RWP-MWI	RWQ-MWI	RWR-MWI	RWS-MWI
2022 Sampling Frequency		Annually	Semiannually	Semiannually	Semiannually	Annually	Semiannually	Semiannually	Semiannually	Semiannually	Semiannually
4/1/2013	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2013	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/1/2014	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2014	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/1/2015	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
2/10/2017-2/16/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/27/2017-3/30/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/25/2017-4/28/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/22/2017-5/24/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
6/5/2017-6/9/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/10/2017-7/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
8/7/2017-8/10/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
9/1/2017-9/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/2/2017-10/9/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
11/3/2017-11/13/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/4/2017-12/8/2017	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
1/2/2018-1/9/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
4/8/2018-4/13/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
7/30/2018-8/3/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
10/1/2018-10/5/2018	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
12/10/2018-12/14/2018*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
3/12/2019-3/19/2019*	µg/L	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
5/3/2019-6/7/2019*	µg/L	<b>8,050</b>	<b>61.2</b>	<b>33.5</b>	<b>1,230</b>	<b>1,080</b>	<b>68</b>	<b>2,810</b>	<b>26.2</b>	<b>440</b>	<i>3 U</i>
9/10/2019-9/23/2019*	µg/L	<b>8,120</b>	<b>11.8</b>	<b>56.5</b>	<b>1,240</b>	<b>1,200</b>	<b>72.1</b>	<b>6,990</b>	<i>3.0 U</i>	<b>535</b>	<i>3.0 U</i>
12/3/2019-12/11/2019	µg/L	<b>8,270</b>	<b>45.7</b>	<b>99.5</b>	<b>1,280</b>	<b>1,230</b>	<b>55.4</b>	<b>8,910</b>	<b>2.9 J</b>	<b>650</b>	<b>1.6 J</b>
3/11/20-3/23/20*	µg/L	<b>13,300</b>	<b>30.0</b>	<b>89.1</b>	<b>1,170</b>	<b>1,120</b>	<b>54.3</b>	<b>5,560</b>	<b>1.9 J</b>	<b>340</b>	<i>3 U</i>
6/8/20-6/30/20*	µg/L	<b>10,800</b>	<b>2.1 J</b>	<b>76.9</b>	<b>1,140</b>	<b>1,040</b>	<b>66.2</b>	<b>7,090</b>	<b>3.7</b>	<b>508</b>	<b>0.58 J</b>
9/9/20-9/29/20*	µg/L	<i>NS</i>	<b>2.3 J</b>	<b>79.1</b>	<b>1,210</b>	<b>1,060</b>	<b>57.8</b>	<b>7,220</b>	<b>4.2</b>	<b>425</b>	<b>1.8 J</b>
11/5/20-11/19/20*	µg/L	<i>NS</i>	<b>2.4 J</b>	<b>74.4</b>	<b>1,160</b>	<b>1,120</b>	<b>27.9</b>	<b>7,700</b>	<b>2.9 J</b>	<b>398</b>	<b>1.7 J</b>
5/26/21-6/18/21*	µg/L	<b>6,810</b>	<b>31.3</b>	<b>97.8</b>	<b>1,290</b>	<b>1,220</b>	<b>35.8</b>	<b>8,430</b>	<b>6.1</b>	<b>367</b>	<b>0.86 J</b>
10/4/21-10/18/21*	µg/L	<i>NS</i>	<b>49.1</b>	<b>77.6</b>	<b>1,230</b>	<i>NS</i>	<b>31.4</b>	<b>4,370</b>	<b>10.6</b>	<b>753</b>	<b>4.7 J</b>
11/29/21-11/30/21*	µg/L	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<i>NS</i>	<b>10.1</b>	<b>2.0</b>	<i>NS</i>	<i>NS</i>	<i>NS</i>
2/23/22-3/28/22	µg/L	<b>5,230</b>	<b>52.8</b>	<b>62.8</b>	<b>1,230</b>	<b>1,250</b>	<b>26.3</b>	<b>5,340</b>	<b>23.3</b>	<b>295</b>	<i>20 U</i>
9/9/2022-9/15/2022*	µg/L	<i>NS</i>	<b>18</b>	<b>73</b>	<b>819</b>	<i>NS</i>	<b>27.3</b>	<b>6,136</b>	<i>2 U</i>	<b>340</b>	<b>25.7</b>

**Bold indicates detection above the reporting limit**

NS = Not Sampled

DNE = Did Not Exist

\*Indicates concentrations are for dissolved metals. All other events show total metals.

**TABLE 9**  
**2022 Intermediate and Deep Field Parameter Data**  
**Rod Wire Mill Interim Measures Progress Report**

Parameters	Units	RW01-MWI		RW02-MWI		RW03/03R-MWI		RW05-MWI		RW06R-MWI		RW06R-MWD		RW07-MWI	
		Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22
pH	s.u.	5.9	6.17	7.12	6.8	DNE	6.17	6.1	6.28	5.29	5.7	6.19	NS	6.05	5.79
Specific Conductance	ms/cm	5.31	7.24	2.67	4.27	DNE	5.79	3.63	4.075	2.5	2.658	0.205	NS	2.77	3.321
Dissolved Oxygen	mg/L	NA	0.67	NA	0.12	DNE	0.24	NA	0.2	NA	0.22	1.1	NS	NA	0.09
ORP	mV	-103	-85.2	-147	-144.8	DNE	-67.4	-85	-87	47	16	-42	NS	-56	-66.8
Turbidity	NTU	8.1	3.24	7.71	10.4	DNE	10.3	7.82	10.8	8.99	4.73	8.6	NS	18.5	10.42
Depth To Water	ft	8.9	8.21	8.39	8.8	DNE	12.62	11.61	11.65	10.55	10.8	11.39	NS	11.8	12.29

Parameters	Units	RW08-MWI		RW09-MWI		RW10-MWI		RW11-MWI		RW12-MWI		RW13-MWI		RW15-MWI	
		Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22
pH	s.u.	3.96	NS	5.9	NS	5.48	NS	5.98	NS	3.41	6.38	5.96	NS	6.66	NS
Specific Conductance	ms/cm	1.3	NS	0.473	NS	1.44	NS	1.77	NS	0.808	1.808	3.89	NS	1.61	NS
Dissolved Oxygen	mg/L	NA	NS	NA	NS	0.64	NS	NA	NS	NA	0.44	NA	NS	NA	NS
ORP	mV	27	NS	-53	NS	-62	NS	-47	NS	66	-64.5	-94	NS	-93	NS
Turbidity	NTU	9.11	NS	8.05	NS	11	NS	8.11	NS	5.41	3.5	8.09	NS	8.63	NS
Depth To Water	ft	11.34	NS	11.92	NS	12.4	NS	11.34	NS	12.51	12.28	12.96	NS	12.3	NS

Parameters	Units	RW16-MWI		RW18-MWI		RW19-MWI		RW21-MWI		RW22R-MWI		RW23-MWI		RW24-MWI	
		Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22
pH	s.u.	7.79	NS	5.62	NS	4.97	NS	3.93	NS	4.01	5.67	4.89	5.5	5.57	NS
Specific Conductance	ms/cm	0.62	NS	3.43	NS	0.28	NS	4.61	NS	4.55	5.66	1.42	2.689	3.26	NS
Dissolved Oxygen	mg/L	NA	NS	NA	NS	NA	NS	NA	NS	NA	0.21	NA	0.39	NA	NS
ORP	mV	-3	NS	-36	NS	-53	NS	-38	NS	-36	-33.4	10	9.6	3	NS
Turbidity	NTU	8.82	NS	9.1	NS	5.62	NS	7.1	NS	8.08	6.47	5.69	8.94	10.1	NS
Depth To Water	ft	10.84	NS	12.57	NS	11.18	NS	13.94	NS	16.14	15.08	13.43	13.55	11.42	NS

RWG-MWS	Units	RW25-MWI		RWA-MWI		RWB-MWI		RWD-MWI		RWE-MWI		RWF-MWI		RWG-MWI	
		Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22
pH	s.u.	5.8	NS	4.27	5.01	7.36	6.05	3.59	5.33	5.38	5.59	5.94	6.16	3.16	NS
Specific Conductance	ms/cm	0.486	NS	3.06	2.885	1	1.143	2.4	2.748	3.07	3.587	7.03	7.17	7.52	NS
Dissolved Oxygen	mg/L	NA	NS	2.11	0.43	NA	0.33	NA	0.43	NA	0.49	NA	0.84	NA	NS
ORP	mV	96	NS	102	145.5	-90	-45.7	58	75.3	-4	25.6	-86	-86.9	-53	NS
Turbidity	NTU	8.73	NS	7.9	10.04	10.4	14.9	4.5	10.6	7.91	9.17	6.41	21.9	8.3	NS
Depth To Water	ft	10.86	NS	10.23	9.53	19.02	18.21	14.95	13.9	13.16	12.82	12.59	10.83	9.93	NS

**TABLE 9**  
**2022 Intermediate and Deep Field Parameter Data**  
**Rod Wire Mill Interim Measures Progress Report**

RWG-MWS	Units	RWH-MWI		RWI-MWI		RWJ-MWI		RWK-MWI		RWL-MWI		RWM-MWI		RWO-MWI	
		Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22
pH	s.u.	4.31	5.92	6.15	NS	6.84	7.47	6.37	6.6	5.77	6.24	5.2	NS	4.61	6.36
Specific Conductance	ms/cm	3.53	3.328	2.68	NS	2.49	2.566	2.49	2.374	2.33	2.573	1	NS	0.303	2.833
Dissolved Oxygen	mg/L	NA	0.05	NA	NS	NA	0.02	NA	0.1	NA	0.29	NA	NS	NA	0.36
ORP	mV	-65	-46.8	165	NS	-132	-185.9	-52	-77.8	-3	-76.3	-9	NS	43	-49.0
Turbidity	NTU	6.94	4.64	8.95	NS	7.14	4.97	9.26	4.72	9.92	10.3	8.5	NS	7.2	2.22
Depth To Water	ft	11.21	10.76	12.38	NS	13.82	13.36	14.3	13.16	14.53	13.57	13.99	NS	10.65	10.43

RWG-MWS	Units	RWP-MWI		RWQ-MWI		RWR-MWI		RWS-MWI	
		Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22	Mar-22	Sep-22
pH	s.u.	5.2	4.71	4.37	5.54	5.36	5.55	4.4	5.5
Specific Conductance	ms/cm	8.37	8.56	2.78	3.664	3.14	4.174	2.08	7.48
Dissolved Oxygen	mg/L	NA	0.45	NA	0.24	NA	0.4	NA	0.42
ORP	mV	136	184.2	-41	-326	-31	34.8	-28	-14.3
Turbidity	NTU	5.92	16.5	8.68	4.71	5.9	10.31	6.15	13.7
Depth To Water	ft	13.44	13.16	16.05	15.57	12.7	11.95	16.58	16.13

**TABLE 10**  
**Statistically Significant Trends**  
**Rod Wire Mill 2022 Interim Measure Progress Report**

Zone	Well ID	Monitoring Area	Parameter Name	Statistical Trend
<b>Shallow</b>	RW01-MWS	Perimeter	Cadmium	Downward
			Zinc	Downward
	RW02-MWS	Perimeter	Cadmium	Downward
	RW05-MWS	Perimeter	Cadmium	Downward
			Zinc	Downward
	RW07-MWS	Perimeter	Cadmium	Upward
			Zinc	Upward
	RW11-MWS	Interior	Zinc	Upward
	RW12-MWS	Interior	Cadmium	Downward
	RW16-MWS	Interior	Cadmium	Downward
			Zinc	Downward
	RW18-MWS	Interior	Cadmium	Downward
			Zinc	Downward
	RWB-MWS	Perimeter	Cadmium	Downward
	RWF-MWS	Perimeter	Cadmium	Downward
			Zinc	Downward
	RWJ-MWS	Focused	Cadmium	Downward
	RWK-MWS	Focused	Cadmium	Downward
			Zinc	Upward
	RWL-MWS	Focused	Cadmium	Downward
RWN-MWS	Interior	Cadmium	Downward	
		Zinc	Downward	
RWO-MWS	Delineation	Cadmium	Downward	
		Zinc	Downward	
RWR-MWS	Upgradient	Cadmium	Downward	

**TABLE 10**  
**Statistically Significant Trends**  
**Rod Wire Mill 2022 Interim Measure Progress Report**

Zone	Well ID	Monitoring Area	Parameter Name	Statistical Trend
<b>Intermediate</b>	RW01-MWI	Perimeter	Cadmium	Upward
			Zinc	Upward
	RW05R-MWI	Perimeter	Cadmium	Downward
	RW06-MWI	Perimeter	Cadmium	Upward
			Zinc	Upward
	RW07-MWI	Perimeter	Cadmium	Upward
			Zinc	Upward
	RW08-MWI	Perimeter	Zinc	Downward
	RW09-MWI	Interior	Zinc	Upward
	RW10-MWI	Interior	Cadmium	Downward
	RW11-MWI	Interior	Cadmium	Downward
			Zinc	Downward
	RW16-MWI	Interior	Cadmium	Downward
			Zinc	Downward
	RW18-MWI	Interior	Cadmium	Downward
	RW19-MWI	Upgradient	Cadmium	Downward
	RW22R-MWI	Perimeter	Cadmium	Upward
			Zinc	Upward
	RW24-MWI	Interior	Cadmium	Downward
			Zinc	Downward
	RW25-MWI	Interior	Cadmium	Upward
	RWB-MWI	Perimeter	Cadmium	Downward
	RWE-MWI	Perimeter	Cadmium	Downward
			Zinc	Downward
	RWF-MWI	Perimeter	Cadmium	Upward
	RWG-MWI	Perimeter	Zinc	Upward
	RWH-MWI	Delineation	Cadmium	Upward
	RWL-MWI	Focused	Zinc	Downward
	RWM-MWI	Interior	Zinc	Downward
	RWO-MWI	Delineation	Cadmium	Downward
Zinc			Downward	
RWQ-MWI	Delineation	Zinc	Downward	
RWR-MWI	Upgradient	Zinc	Downward	
RWS-MWI	Upgradient	Cadmium	Upward	
		Zinc	Downward	

*Note: Cadmium and zinc in all wells underwent trend testing. If the result of the testing was that no upward or downward trend was identified for a parameter at a particular well, it was not included in this table.*

**TABLE 11**  
**Average Historical Shallow Zone Concentrations**  
 Rod Wire Mill Interim Measure Progress Report

Shallow Zone Cadmium Concentration (µg/L)									
Well Group	Well	2015	2017	2018	2019	2020	2021	2022	% Change from Earliest Yearly Average
Upgradient	RW19-MWS	NA	6.4	3.4	1.4	1.8	NS	NS	NA
Interior	RW09-MWS	NA	14.0	13.0	13.3	16.3	NS	NS	NA
	RW11-MWS	NA	1.8	15.0	1.8	2.2	3.4	1.0	-45%
	RW12-MWS	3.8	37.6	9.3	3.6	5.2	0.5	3.0	-20%
	RW14-MWS	NA	2,088	3,440	3,350	3,218	NS	NS	NA
	RW15-MWS	NA	37.1	59.1	12.6	2.0	NS	NS	NA
	RW16-MWS	NA	1.5	1.5	1.2	1.5	1.5	1.5	1.0
Perimeter	RW18-MWS	100	244	137	1.6	1.5	1.5	1.0	-99%
	RW01-MWS	NA	24.8	7.2	3.2	2.1	0.5	0.6	-98%
	RW02-MWS	NA	8.4	9.4	2.0	0.6	1.0	0.1	-99%
	RW03-MWS	NA	6.6	12.9	15.2	16.7	NS	NS	NA
	RW04-MWS	2.8	1.1	1.5	1.3	0.9	NS	NS	NA
	RW05-MWS	NA	3.3	1.5	1.5	1.0	1.0	0.1	-97%
	RW06R-MWS	NA	NA	1.2	1.5	1.0	1.5	1.0	-14%
RW07-MWS	NA	3.1	4.6	3.0	3.5	1.7	16.6	443%	
RW08-MWS	NA	3.4	1.4	1.2	1.3	NS	NS	NA	

Shallow Zone Zinc Concentration (µg/L)									
Well Group	Well	2015	2017	2018	2019	2020	2021	2022	% Change from Earliest Yearly Average
Upgradient	RW19-MWS	NA	6,082	8,226	3,190	9,200	NS	NS	NA
Interior	RW09-MWS	NA	10,982	9,856	16,400	33,125	NS	NS	NA
	RW11-MWS	NA	12,933	46,100	33,475	41,975	61,000	13,500	4%
	RW12-MWS	2,608	38,761	6,516	3,086	4,660	4,960	17,100	556%
	RW14-MWS	NA	38,340	69,380	70,825	62,375	NS	NS	NA
	RW15-MWS	NA	3,737	4,002	424	30	NS	NS	NA
	RW16-MWS	NA	32	26.6	35.2	9.0	3.0	10.0	-69%
Perimeter	RW18-MWS	3,691	13,503	7,648	17.3	8.6	20.1	100.0	-97%
	RW01-MWS	NA	11,632	32,460	14,875	6,800	4,640	8,853	-24%
	RW02-MWS	NA	3,308	9,146	15,749	3,360	238	21,902	562%
	RW03-MWS	NA	13,958	27,920	16,668	17,800	NS	NS	NA
	RW04-MWS	2,330	145	180	239	62	NS	NS	NA
	RW05-MWS	NA	1,617	34.3	14.2	7.4	12.4	35.7	-98%
	RW06R-MWS	NA	NA	9.9	8.8	9.1	5.0	10.0	1%
RW07-MWS	NA	131	230	149	172	298	406.0	209%	
RW08-MWS	NA	3,436	7,320	7,125	6,558	NS	NS	NA	

Positive % change  
 Negative % change  
 NA = Not Applicable  
 NS = Not Sampled

**TABLE 12**  
**Average Historical Intermediate Zone Concentrations**  
 Rod Wire Mill Interim Measure Progress Report

Average Cadmium Concentration (µg/L)									
Well Group	Well	2015	2017	2018	2019	2020	2021	2022	% Change from Earliest Yearly Average
Upgradient	RW19-MWI	NA	2,397	1,748	1,705	1,990	112	109	-95%
Interior	RW09-MWI	NA	9.1	2.0	3.2	12.0	16.0	1	-89%
	RW10-MWI	NA	72.8	20.6	5.9	0.7	11.1	13	-82%
	RW11-MWI	25,000	1,065	872	419	206	175	194	-99%
	RW12-MWI	7,890	2,563	578	1,122	716	NS	1,238	-84%
	RW13-MWI	44,500	17,022	8,334	12,941	12,155	26,400	23,700	-47%
	RW15-MWI	NA	3.1	6.8	415	2.7	43.6	169	5327%
	RW16-MWI	NA	1.7	1.4	1.2	1.2	0.42	1	-39%
Perimeter	RW18-MWI	80.1	70.9	79.8	64.1	34.5	1.5	32	-60%
	RW01-MWI	NA	75.7	59.2	12.6	82.5	299.5	570	652%
	RW02-MWI	NA	104	59.5	508	186	1	9	-91%
	RW03-MWI	NA	134	285	388	516	NS	9.6	-93%
	RW06-MWI	34.8	10.2	292	807	451	610	618	1679%
	RW07-MWI	NA	2.8	93.9	142	18.9	49.1	74.9	2573%
RW08-MWI	NA	1.0	4.8	1.3	0.7	0.38	1.0	-4%	

Average Zinc Concentration (µg/L)									
Well Group	Well	2015	2017	2018	2019	2020	2021	2022	% Change from Earliest Yearly Average
Upgradient	RW19-MWI	NA	4,716,364	5,278,000	5,050,000	5,662,500	212,000	3,090,000	-34%
Interior	RW09-MWI	NA	53,827	52,740	64,250	74,050	93,600	63,000	17%
	RW10-MWI	NA	29,084	10,143	4,975	860	6,130	7,440	-74%
	RW11-MWI	1,120,000	225,636	158,940	139,000	148,333	188,000	141,000	-87%
	RW12-MWI	339,000	189,909	68,142	92,125	86,400	NS	90,275	-73%
	RW13-MWI	658,000	137,079	96,762	143,555	136,512	363,000	435,000	-34%
	RW15-MWI	NA	1,094	6,374	118,100	843	16,400	49,300	4405%
	RW16-MWI	NA	10,460	5,861	11.4	29.8	62.4	120	-99%
Perimeter	RW18-MWI	642,000	475,000	332,400	647,500	521,000	4,380	434,000	-32%
	RW01-MWI	NA	13,284	3,107	4,033	9,256	25,300	33,155	150%
	RW02-MWI	NA	3,784	6,839	41,825	17,331	269	4,675	24%
	RW03-MWI	NA	6,419	10,866	11,680	16,150	NS	3,063	-52%
	RW06-MWI	6,045	1,209	43,988	117,000	80,620	97,250	48,835	708%
	RW07-MWI	NA	719	25,985	56,275	19,700	53,900	65,300	8981%
RW08-MWI	NA	81.8	800	16.0	17.9	2.6	10	-88%	

Positive % change  
 Negative % change  
 NA = Not Applicable  
 NS = Not Sampled

The RW13-MWI concentrations for 2015 are actually results for a sample from RW-057-PZ, a PDI piezometer existing in November 2015 at a location within a few feet of the current location of RW13-MWI.