

Gavin Power, LLC

Addendum to 2020 Annual Groundwater Monitoring and Corrective Action Reports

Gavin Residual Waste Landfill and Fly Ash
Reservoir

Gavin Plant
Cheshire, Ohio

7 December 2021

Project No.: 0589450

Signature Page

7 December 2021

Addendum to 2020 Annual Groundwater Monitoring and Corrective Action Reports

Gavin Residual Waste Landfill and Fly Ash Reservoir



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Acronyms and Abbreviations

amsl	above mean sea level
ASD	Alternate Source Demonstration
BAC	Bottom Ash Complex
BAP	Bottom Ash Pond
CCR	Coal combustion residuals
CCR Rule	Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments
CCR Unit	Bottom Ash Pond CCR Surface Impoundment
CFR	Code of Federal Regulations
ERM	ERM Consulting & Engineering, Inc.
FAR	Fly Ash Reservoir
Gavin	Gavin Power, LLC
OEPA	Ohio Environmental Protection Agency
ORSANCO	Ohio River Valley Water Sanitation Commission
Plant	General James M. Gavin Power Plant
RWL	Residual Waste Landfill
SSI	Statistically Significant Increase
USGS	United States Geological Survey

EXECUTIVE SUMMARY

On behalf of Gavin Power, LLC (Gavin), ERM Consulting and Engineering, Inc. (ERM) has prepared this *Addendum to the 2020 Annual Groundwater Monitoring and Corrective Action Reports (Addendum)* for the Residual Waste Landfill (RWL) and Fly Ash Reservoir (FAR) at the General James M. Gavin Power Plant (Plant) located in Cheshire, Ohio. The RWL and FAR are coal combustion residual (CCR) management units at the Plant that are subject to regulation under Title 40, Code of Federal Regulations, Part 257, Subpart D (40 CFR § 257.50 *et seq.*), also known as the CCR Rule. In 2021, a combined monitoring well network was certified for the RWL and FAR, as documented in the *Updated Groundwater Monitoring System Evaluation and Certification—40 CFR 257.91* (ERM 2021a). Previously, Gavin maintained and monitored two separate (though adjacent) groundwater monitoring networks for the RWL and FAR. Following the combination and certification of the two networks into a single combined monitoring well network, Gavin commissioned ERM to evaluate the data from the combined network to verify the conclusions contained in the 2020 Annual Groundwater Monitoring and Corrective Action Reports for the RWL and FAR, which were prepared and posted consistent with the requirements of 40 CFR § 257.90(e). Specifically, this Addendum evaluates the 2020 groundwater monitoring results from the combined monitoring well network to determine whether they confirm the CCR Rule compliance findings contained in the 2020 annual reports.

The groundwater monitoring programs for the RWL and FAR began calendar year 2020 in “detection monitoring” status as defined by 40 CFR § 257.94. Groundwater monitoring in 2020 consisted of two semiannual monitoring events completed in March and September 2020, which included groundwater level measurements and groundwater sampling. Groundwater level measurements were used to construct updated groundwater potentiometric surface maps for each of the geologic units monitored. Groundwater samples were collected for laboratory analysis of CCR Rule Appendix III constituents and the results were compared to previously calculated upgradient well prediction limits to identify statistically significant increases (SSIs) for downgradient wells.

Only one SSI for an Appendix III constituent was identified at each CCR unit during 2020 based on sampling of the separate groundwater monitoring networks: an SSI for pH at FAR monitoring well 2016-07 in the first half of 2020, and an SSI for total dissolved solids (TDS) at RWL monitoring well 2016-20 in the second half of 2020. Gavin successfully prepared alternate source demonstrations (ASDs) for these two SSIs, allowing both CCR units to remain in detection monitoring in 2021.

In preparing this Addendum, ERM, on behalf of Gavin, evaluated the 2020 data from the combined groundwater monitoring network (as certified in August 2021) to determine whether reliance on the combined network in 2020 would have changed any of the CCR compliance determinations contained in the 2020 Annual Reports for the RWL and FAR. Only one SSI was identified when evaluating the data collected in 2020 from the combined monitoring network: boron at monitoring well 2018-01 in March 2020. Although technically not applicable to 2020 (because the combined network was not certified until August 2021), ERM nevertheless prepared an ASD for the boron SSI (as presented in Section 4 of this Addendum) to determine whether that finding would have changed the monitoring status of either CCR unit. The ASD presented in Section 4 identifies regional brine as the source of boron and identifies the use of cement-bentonite grout for well installation as the catalyst for the localized mobilization of previously adsorbed boron. Thus, even if the combined monitoring well network had been in effect in 2020, the RWL and FAR would have remained in detection monitoring at the conclusion of 2020. Accordingly, no remedial actions would have been required in 2020, regardless of whether the separate or combined monitoring well networks had been used.

INTRODUCTION

The General James M. Gavin Plant (Plant) is located in southeast Ohio along the western bank of the Ohio River (Figure 1-1) near Cheshire, Ohio. The Plant consists of three regulated coal combustion residual (CCR) management units that are subject to regulation under Title 40, Code of Federal Regulations, Part 257, Subpart D (40 CFR 257.50 *et seq.*), also known as the CCR Rule: the Residual Waste Landfill (RWL), the Fly Ash Reservoir (FAR), and the Bottom Ash Pond (BAP). A combined groundwater monitoring system was certified in August 2021 to monitor for potential releases from the RWL and FAR. Previously, Gavin maintained and monitored two separate (though adjacent) groundwater monitoring networks for the RWL and FAR, but certified the combined monitoring network on August 31, 2021 (*Updated Groundwater Monitoring System Evaluation and Certification—40 CFR 257.91* (ERM 2021a)). The BAP has a separate monitoring system (ERM 2021b) and is not addressed in this report.

ERM Consulting & Engineering, Inc. (ERM) has prepared this Addendum to the 2020 Annual Groundwater Monitoring and Corrective Action Report on behalf of Gavin Power, LLC (Gavin) to evaluate the data collected in 2020 from the wells included in the current combined groundwater monitoring network to determine whether reliance on that combined network in 2020 (as opposed to the separate networks in place at the time) would have changed any of the CCR Rule compliance findings and conclusions contained in the 2020 annual reports for the RWL and FAR.

In accordance with the CCR Rule, Gavin has been implementing the groundwater monitoring requirements of 40 CFR § 257.90 *et seq.* for its RWL and FAR CCR units at the Plant. Gavin calculated background levels and conducted statistical analyses for Appendix III constituents in accordance with 40 CFR § 257.93(h). Currently, Gavin is performing detection monitoring at the RWL and FAR in accordance with 40 CFR § 257.94.

REGULATORY STATUS

2.1 Description of the CCR Units

The RWL is located about 1.25 miles northwest of the Plant (Figure 2-1) and is permitted by the Ohio Environmental Protection Agency to accept and dispose of CCR material as a Class 3 Landfill. Approximately 98 percent of this material is Flue Gas Desulfurization byproduct (consisting of scrubber cake, fly ash, and lime) and the remaining 2 percent is other approved materials (bottom ash, lime ball mill rejects, coal pulverizer rejects, and BAP sediments).

The FAR is approximately 300 acres in size and is located about 2.5 miles northwest of the Plant (Figure 2-1). From the mid-1970s until January 1995, fly ash was sluiced to the FAR and the settled CCR materials were retained behind the Stingy Run Fly Ash Dam that formed the FAR. The facility was closed in place, and the closure was completed in 2021.

Expansion of the RWL was proposed in the *Final Permit-to-Install Application – Expansion of the Gavin Plant Residual Waste Landfill (PTI)* submitted in 2012 (Geosyntec 2012). Expansion of the RWL has been ongoing as the capacity needs have arisen, and the limit of waste has extended northward. As a result of this expansion and the placement of CCR in formerly undisturbed areas, Gavin has had to abandon a limited number of groundwater monitoring wells within the larger footprint.

2.2 Description of Monitoring System

The RWL and FAR had previously been monitored using separate groundwater monitoring networks as described in the documents: *Groundwater Monitoring Network Evaluation—Residual Waste Landfill* (Geosyntec 2016a) and the *Groundwater Monitoring Network Evaluation—Fly Ash Reservoir* (Geosyntec 2016b). Annual Groundwater Monitoring and Corrective Action Reports for 2020 under these separate monitoring systems were prepared for the FAR (ERM 2021c) and RWL (ERM 2021d) and were posted to the Plant operating record on 31 January 2021. As a result of the ongoing expansion of the RWL, several monitoring wells along the northern and western RWL boundaries were removed and a portion of the RWL was expanded over the FAR. To account for these changes and ensure an adequate groundwater monitoring system for both units, a combined network for the two CCR units was identified and certified in August 2021.

The combined network currently contains 24 upgradient and 15 downgradient monitoring wells. The upgradient wells are placed to accurately represent the quality of background groundwater that has not been affected by potential leakage from the RWL and FAR units, while the downgradient wells are positioned at the downgradient boundary of waste to detect potential release of CCR constituents from the CCR units into groundwater in the uppermost aquifer.

2020 STATUS OF MONITORING PROGRAM

3.1 2020 Sampling Summary

Groundwater samples were collected in 2020 as part of the detection monitoring program under 40 CFR § 257.94 and analyzed for the constituents listed in Appendix III to 40 CFR Part 257, Subpart D. Samples were collected in 2020 based on the existing separate 2016 RWL and FAR monitoring networks; therefore, some wells that were added to the combined monitoring program in 2021 were not sampled in 2020. Table 3-1 lists all of the wells in the combined network, the dates of sampling, or “NS” for wells that were not sampled in spring or fall of 2020.

Consistent with the CCR Rule and the Gavin Statistical Analysis Plan (ERM 2017), a prediction limit approach was used to identify potential impacts to groundwater. Upper prediction limits were developed for the Appendix III parameters; in the case of pH, a lower prediction limit was also developed. The 2018 Alternate Source Demonstration for the RWL (ERM 2018) provides documentation of the most recent revisions of the upper and lower prediction limits.

Table 3-1. 2020 Sampling Dates for RWL-FAR Combined Network

Monitoring Well	Geologic Unit	Location	Sampling Dates	
			Spring	Fall
2000	Morgantown	Downgradient	24 March 2020	22 September 2020
2003	Morgantown	Upgradient	24 March 2020	21 September 2020
9396	Cow Run	Upgradient	NS	NS
9631	Cow Run	Downgradient	NS	NS
9801	Cow Run	Upgradient	24 March 2020	NS
9802	Alluvium	Downgradient	24 March 2020	22 September 2020
9806	Morgantown	Downgradient	25 March 2020	17 September 2020
9910	Morgantown	Upgradient	15 March 2020	17 September 2020
93100	Cow Run	Upgradient	19 March 2020	22 September 2020
93108	Morgantown	Downgradient	NS	NS
94136	Cow Run	Downgradient	25 March 2020	25 September 2020
94137	Alluvium	Downgradient	25 March 2020	25 September 2020
94139	Morgantown	Upgradient	19 March 2020	22 September 2020
96152	Morgantown	Upgradient	26 March 2020	17 September 2020
96153R*	Morgantown	Upgradient	15 March 2020 24 March 2020	15 September 2020
96154R	Morgantown	Upgradient	12 March 2020	14 September 2020
96156	Morgantown	Upgradient	NS	NS
96157	Alluvium	Downgradient	NS	NS
96158	Cow Run	Downgradient	NS	NS
2016-03	Morgantown	Upgradient	25 March 2020	21 September 2020
2016-04	Cow Run	Upgradient	25 March 2020	21 September 2020
2016-05	Morgantown	Downgradient	NS	NS

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Monitoring Well	Geologic Unit	Location	Sampling Dates	
			Spring	Fall
2016-06	Cow Run	Downgradient	15 March 2020	17 September 2020
2016-07*	Morgantown	Upgradient	15 March 2020 24 March 2020	17 September 2020
2016-08*	Cow Run	Upgradient	15 March 2020 24 March 2020	17 September 2020
2016-09	Cow Run	Upgradient	12 March 2020	14 September 2020
2016-10	Cow Run	Upgradient	30 March 2020	14 September 2020
2016-11	Morgantown	Upgradient	NS	NS
2018-01	Cow Run	Downgradient	24 March 2020	22 September 2020
2018-02	Morgantown	Downgradient	8 April 2020	16 November 2020
2018-03	Cow Run	Downgradient	8 April 2020	16 November 2020
2018-04	Morgantown	Downgradient	8 April 2020	16 November 2020
2019-02	Morgantown	Upgradient	NS	15 September 2020
2019-06	Morgantown	Upgradient	NS	15 September 2020
2019-07	Cow Run	Upgradient	NS	NS
2019-09	Cow Run	Upgradient	NS	NS
MW-16	Morgantown	Upgradient	NS	NS
MW-17	Cow Run	Upgradient	NS	NS
MW-20*	Cow Run	Upgradient	15 March 2020 24 March 2020	15 September 2020

Notes:

NS = Not Sampled

* Samples collected 15 March 2020 were misplaced for monitoring wells 96153R, 2016-07, 2016-08, and MW-20. The wells were re-sampled on 24 March 2020. The first samples were located and both sets of samples were analyzed. Both sets of data were found to be valid and appropriate for decision making purposes.

3.2 2020 Sampling Event Results

Results from the 2020 sampling from the wells included in the current combined groundwater monitoring network (as listed in Table 3-1 above) are summarized in Table 3-2 for the Morgantown/Alluvium downgradient wells and Table 3-3 for the Cow Run downgradient wells.

Table 3-2: SSIs from 2020 Sampling Events—Morgantown/Alluvium

Analyte/Event	Monitoring Well																	
	2000		93108 ¹		94137		96157 ²		9802		9806		2016-05 ¹		2018-02		2018-04	
	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2
Boron	φ	φ	NS	NS	φ	φ	NS	NS	φ	φ	φ	φ	NS	NS	φ	φ	φ	φ
Calcium	φ	φ	NS	NS	φ	φ	NS	NS	φ	φ	φ	φ	NS	NS	φ	φ	φ	φ
Chloride	φ	φ	NS	NS	φ	φ	NS	NS	φ	φ	φ	φ	NS	NS	φ	φ	φ	φ
Fluoride	φ	φ	NS	NS	φ	φ	NS	NS	φ	φ	φ	φ	NS	NS	φ	φ	φ	φ
pH	φ	φ	NS	NS	φ	φ	NS	NS	φ	φ	φ	φ	NS	NS	φ	φ	φ	φ
Sulfate	φ	φ	NS	NS	φ	φ	NS	NS	φ	φ	φ	φ	NS	NS	φ	φ	φ	φ
Total Dissolved Solids	φ	φ	NS	NS	φ	φ	NS	NS	φ	φ	φ	φ	NS	NS	φ	φ	φ	φ

Notes: H1 = spring; H2 = fall; NS = Not Sampled; φ = No SSI; X = SSI; SSI = statistically significant increase
 1. Wells 93108 and 2016-05 were not sampled in 2020 because they had an insufficient volume of water to allow collection of samples.
 2. Well 96157 was not sampled in 2020 because it was not part of the federal monitoring network at the time of sampling.

Table 3-3: SSIs from 2020 Sampling Events—Cow Run

Analyte/Event	Monitoring Well											
	94136		96158 ¹		9631 ¹		2016-06		2018-01		2018-03	
	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2
Boron	φ	φ	NS	NS	NS	NS	φ	φ	X	φ	φ	φ
Calcium	φ	φ	NS	NS	NS	NS	φ	φ	φ	φ	φ	φ
Chloride	φ	φ	NS	NS	NS	NS	φ	φ	φ	φ	φ	φ
Fluoride	φ	φ	NS	NS	NS	NS	φ	φ	φ	φ	φ	φ
pH	φ	φ	NS	NS	NS	NS	φ	φ	φ	φ	φ	φ
Sulfate	φ	φ	NS	NS	NS	NS	φ	φ	φ	φ	φ	φ
Total Dissolved Solids	φ	φ	NS	NS	NS	NS	φ	φ	φ	φ	φ	φ

Notes: H1 = spring; H2 = fall; NS = not sampled; φ = No SSI; X = SSI; SSI = statistically significant increase
 1. Wells 96158 and 9631 were not sampled as part of the federal sampling event in spring 2020 because they were not part of the federal monitoring network at the time of sampling.

Comparing the results of samples taken from the wells in the combined groundwater monitoring network during 2020 to the previously determined prediction limits revealed only one SSI – boron at 2018-01 in spring 2020. Although not technically required, because the combined network was only certified in August 2021, ERM, on behalf of Gavin, nevertheless prepared an ASD to determine whether that SSI could have indicated a release from one of the CCR units. Based on that ASD, an alternate source for the boron SSI at 2018-01 was identified, as discussed in Section 4 of this Addendum. A record of all historical

analytical results obtained from wells in the RWL/FAR groundwater monitoring program is included in Appendix A.

ALTERNATE SOURCE DEMONSTRATION

4.1 Regulatory and Legal Framework

In accordance with 40 CFR § 257.93(h), Gavin compared spring and fall 2020 sampling results to calculated background levels for Appendix III constituents. A statistically significant increase over the background concentration was detected in downgradient monitoring well 2018-01 for an Appendix III constituent for the spring 2020 semiannual groundwater sampling event.

An SSI for one or more Appendix III constituents is considered under the CCR Rule as a potential indication of a release from the CCR unit to groundwater. In the event of an SSI, the CCR Rule provides that “the owner or operator may demonstrate that a source other than the CCR unit caused the statistically significant increase over background levels for a constituent or that the statistically significant increase resulted from an error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality” (40 CFR § 257.94(e)(2)). If it can be demonstrated that the SSI is due to a source other than the CCR unit, then the CCR unit may remain in the Detection Monitoring Program instead of transitioning to an Assessment Monitoring Program. An Alternate Source Demonstration (ASD) must be made in writing and the accuracy of the information must be verified through certification by a qualified Professional Engineer (40 CF § 257.94(e)(2)).

The United States Environmental Protection Agency (USEPA) guidance document, “Solid Waste Disposal Facility Criteria Technical Manual, USEPA 530-R-93-017, Subpart E” (USEPA 1993), specifies six lines of evidence (listed below) that must be addressed to determine whether an SSI resulted from a source other than the regulated disposal unit.

1. An alternative source exists.
2. A hydraulic connection exists between the alternative source and the well with the significant increase.
3. Constituent(s) (or precursor constituents) are present at the alternative source or along the flow path from the alternative source prior to possible release from the unit.
4. The relative concentration and distribution of constituents in the zone of contamination are more strongly linked to the alternative source than to the unit when the fate and transport characteristics of the constituents are considered.
5. The concentration observed in groundwater could not have resulted from the unit given the waste constituents and concentrations in the unit leachate and wastes and the site hydrogeologic conditions.
6. The data supporting conclusions regarding the alternative source are historically consistent with the hydrogeologic conditions and findings of the monitoring program.

This ASD addresses each of these lines of evidence for the SSI detected in the groundwater beneath the RWL/FAR in spring 2020—boron at monitoring well 2018-01.

4.2 Description of Alternate Source

The alternate source identified for boron at monitoring well 2018-01 is naturally occurring regional brine within the Cow Run Sandstone (Figure 4-1). The Cow Run is the shallowest sedimentary member that carries naturally occurring brine in the region of the Plant (Phalen 1919, Stout et. al. 1932). Under neutral pH conditions boron in brine-impacted groundwater would partition from groundwater to aquifer solids through adsorption processes; this process results in the accumulation of boron on aquifer solids and limits the concentration of boron in groundwater. Boron adsorption to aquifer solids increases with

increasing pH, reaching a maximum around pH 9.0, while further increases in pH result in desorption and greater mobility of boron in groundwater (Goldberg 1997, ATSDR 2010, Steiner and do Carmo Lana 2013).

The sandstone, shale, limestone, coal, and other sedimentary rocks of the Conemaugh Group in southeast Ohio do not contain caustic minerals or rocks, and Cow Run groundwater upgradient of the Plant has a near-neutral pH. The use of cement-bentonite grout for well construction has a potential to impact groundwater pH if the cement does not cure quickly; when these impacts are observed, they are typically associated with groundwater pH values above 10 (Pohlmann and Alduino 1992). In low-permeability formations like the Cow Run, the impacts of grout materials may persist for months to years due to the slower rate of groundwater migration through the screened interval of the monitoring well (Pohlmann and Alduino 1992, Barcelona and Helfrich. 1986). The introduction of strongly alkaline material such as cement into the Cow Run Sandstone therefore has the potential to cause desorption of boron from the aquifer solids, and thereby increase the concentration of boron in groundwater.

Groundwater from monitoring well 2018-01 had a pH of 12.1 during the first sampling event in November 2019; pH values this high are not observed at other nearby Cow Run wells, and is strongly indicative of impacts from uncured cement. The pH declined in each successive sampling event, which is consistent with curing of the cement and flushing of the well screen interval. During the time period from November 2019 to September 2021, the concentration of boron in groundwater declined from 0.9 milligrams per liter to 0.45 milligrams per liter (Figure 4-2). Results from samples collected after spring 2020 show boron results below the upper prediction limit.

These lines of evidence demonstrate the alternate source identified for boron at monitoring well 2018-01 is boron adsorbed to aquifer solids within the Cow Run Sandstone. Naturally occurring regional brine mixed with groundwater is a regional source of boron, and under neutral pH conditions, boron is expected to adsorb (i.e., accumulate) on aquifer solids.

4.3 Hydraulic Connections to the Alternate Source

Regional groundwater flow near and surrounding the RWL occurs primarily within fractured sedimentary rocks of the Conemaugh Group, which contain the Morgantown and the Cow Run Sandstones (Wyrick and Borchers 1981, USGS 2016). These sedimentary rock groups extend west of the RWL where naturally occurring brine is known to influence groundwater quality. Figure 4-1 illustrates the pathway for regional groundwater flow through the fractured bedrock from the northern and western regions under the RWL, to the southern and eastern regions toward the Ohio River. While migrating through the fractured bedrock, upgradient groundwater can mix with naturally occurring brine containing boron as it then flows beneath the RWL. Over time, low levels of boron contained within the groundwater have interacted with bedrock and underwent adsorption to aquifer solids. Based on these considerations, the fractured rock of the Conemaugh Group, which includes the Cow Run Sandstone, is hydraulically connected to the potential alternate source of boron.

In addition, cement injected in the borehole during construction of monitoring well 2018-01 could have penetrated the fractured bedrock aquifer immediately surrounding the well screen. Groundwater migrating through the aquifer near the well screen likely was exposed to the uncured cement, exposing the aquifer solids to elevated pH conditions in the immediate vicinity of the well screen. Thus, the alternate source (boron adsorbed to aquifer solids) and the release mechanism (elevated pH from cement) are in hydraulic connection with groundwater entering monitoring well 2018-01.

4.4 Presence of Constituents from the Alternate Source

Cement mixtures are strongly basic and can have a pH between 12 and 13 (Portland Cement Association 2018). Groundwater surrounding the well screen of well 2018-01 likely contacted uncured cement. The

elevated pH persists after well installation and multiple sampling events due to the naturally low groundwater velocity of the Cow Run formation, and the limited flushing of the well screen interval.

Boron has been reported to be present in brine (Fan et al. 2018, White et al. 1963, EPRI 2017). Over long periods of time, boron flowing through the region could be adsorbed to aquifer solids by exchange with surface hydroxyl groups (Goldberg and Su 2006). This adsorbed boron would be released by the high pH water resulting from groundwater contacting uncured cement.

As discussed in Section 4.3, brine is commonly found at relatively shallow depths or at the land surface in the Ohio River Valley. The fractured bedrock aquifers of the Monongahela and Conemaugh Group act as the flow pathways where brine can mix with groundwater (Figure 4-1). The Cow Run is the shallowest sedimentary member that carries naturally occurring brine in the region of the Plant (Stout et al. 1932).

These combined lines of evidence demonstrate that the alternative source is boron present in regional brine and along the flow paths underneath the RWL, and the release mechanism (desorption from aquifer solids due to elevated pH) is present in the vicinity of monitoring well 2018-01.

4.5 Relationship of the Alternate Source to Downgradient Wells

The geochemical fingerprints of landfill leachate and monitoring wells screened in the Cow Run Sandstone were determined using a Piper diagram. The Piper diagram is a graphical procedure commonly used to interpret sources of dissolved constituents in water and evaluate the potential for mixing of waters from different sources (Piper 1944). The samples presented on the diagram were collected from 2010 through 2021. The primary observations and conclusions based on the 2018-01 Piper Diagram (Figure 4-3) are the following:

- Multiple datasets collected from a single location (e.g., monitoring well 94136 or Pond 1 Leachate) tended to be tightly clustered, indicating that the chemical signatures of individual locations were consistent over time.
- Regional brine is characterized by elevated sodium/potassium and chloride, and plots on the right side of the upper diamond. The anion signature is dominated by chloride and regional brine consistently plots in the bottom-right corner of the lower-right triangle.
- Groundwater from the upgradient Cow Run wells 2019-07, 93100, and 9801 (shown in blue on Figure 4-3) has a geochemical signature dominated by chloride and sodium, with very low sulfate and magnesium.
- Landfill leachate plots in the upper portion of the upper diamond of the piper diagram and is characterized by elevated concentrations of calcium and sulfate or chloride.
- Groundwater from the downgradient Cow Run wells 2018-03, 94136, and 9631 has a geochemical signature similar to upgradient groundwater, dominated by chloride and sodium. When compared to landfill leachate, downgradient groundwater has lower calcium and sulfate.
- Groundwater at monitoring well 2018-01 has a geochemical signature similar to upgradient and downgradient Cow Run groundwater and is distinct from leachate.

Thus, the chemical characteristics of groundwater from monitoring well 2018-01 are more strongly linked to the alternative source (brine impacted groundwater in the Cow Run) than to the RWL, whose leachate has a distinct geochemical signature that is higher in calcium and sulfate.

4.6 RWL Release Potential

The RWL was constructed with a leachate collection system, and leachate is collected and treated in several ponds located around the landfill. Analytical results are available for samples collected from the

leachate ponds, and represent the geochemical fingerprint of water in direct contact with CCR leachate from the RWL. As described in Section 4.5, and displayed on Figure 4-3, the signature of groundwater at monitoring well 2018-01 is similar to other Cow Run wells and is distinct from the signature of leachate.

Additionally, the RWL is located above the Morgantown Sandstone, and a release would impact groundwater at Morgantown monitoring wells. However, elevated boron concentrations were not observed at any downgradient Morgantown wells. These lines of evidence combine to demonstrate that RWL leachate is not the source of the boron observed at well 2018-01.

4.7 Alternate Source Consistency with Hydrogeologic Conditions

This ASD provides background groundwater quality for the fractured sedimentary bedrock aquifers found within and beyond the boundary of the RWL. The patterns of regional groundwater flow through fractured rock near the RWL were established after the last deglaciation, which occurred approximately 14,000 years ago (Hansen 2017). A conservatively high effective porosity of 1 percent results in an estimated groundwater velocity for the Morgantown Sandstone and Cow Run Sandstone of 75 feet per year and 32 feet per year based on groundwater gauging in the fall of 2020, respectively, which would allow ample time for groundwater to migrate from upgradient regional sources onto Plant property since the end of the last glaciation. The data supporting these conclusions are historically consistent with hydrogeologic conditions and findings of the monitoring program.

4.8 Conclusions

The boron concentration associated with the sample collected from monitoring well 2018-01 in March 2020 was an SSI over the background concentration as determined retroactively after the well was added to the combined groundwater monitoring network for the RWL and FAR. The SSI was determined to be from an alternate source: boron in naturally occurring brine had mixed with groundwater in the Cow Run Sandstone and also adsorbed to aquifer solids. The mechanism of release was the use of cement for installation of monitoring well 2018 01, which resulted in a temporary and localized increase in pH that facilitated desorption of boron from aquifer solids to groundwater. Table 9-1 summarizes the six lines of evidence of this ASD for this SSI.

Table 4-1: 2018-01 ASD Summary

Line of Evidence	TDS
Alternate source	Naturally occurring boron from regional brine was mobilized by high pH groundwater resulting from cement-grout intrusion.
Hydraulic connection	Cement from well construction is in contact with groundwater; regional groundwater flows under the RWL.
Constituent present at source or along flow path	Boron is present in regional brine within the Cow Run Sandstone and cement is located near the well screen.
Constituent distribution more strongly linked to alternate source	The geochemical signature of 2018-01 groundwater is consistent with upgradient Cow Run wells, and not consistent with the signature of RWL leachate.
Constituent could not have resulted from the RWL	Piper diagrams depict different chemical fingerprints between RWL leachate and groundwater, and a release would have impacted shallower aquifers before impacting the Cow Run, yet no SSIs were identified for the Morgantown Sandstone in the spring of 2020.

Line of Evidence	TDS
Data are historically consistent with hydrogeologic conditions	Sufficient time has passed since the last ice age for brine-impacted groundwater to migrate through the Cow Run Sandstone under the RWL, which is historically consistent with the hydrogeologic conditions and findings of the monitoring program.

In conclusion, the RWL was not the source of the potential boron SSI identified in the retroactive evaluation of data from the first semiannual groundwater sampling event of 2020, based on the current combined groundwater monitoring network. Thus, consistent with the conclusions contained in the 2020 Annual Groundwater Monitoring and Corrective Action Reports for the RWL and FAR, the Plant will continue detection monitoring at the RWL in accordance with 40 CFR § 257.94(e)(2). Moreover, results from semiannual sampling events in fall 2020 and spring 2021 indicate boron concentrations have decreased below the upper prediction limit and there have been no further SSIs.

4.9 Key Future Activities

As demonstrated herein, a release from the RWL/FAR is not responsible for the SSI identified through the retroactive evaluation of 2020 data from the now-combined groundwater monitoring network. Based on the previous findings presented in the 2020 annual reports for the RWL and FAR, and consistent with the additional evaluation of data from the current combined network presented in this Addendum, the RWL and FAR remain in detection monitoring in 2021. The 2021 annual report will include all wells sampled as part of the revised RWL/FAR well network and results will be compared to the prediction limits.

PROFESSIONAL ENGINEER CERTIFICATION

I hereby certify that I, or an agent under my review, have prepared this Alternate Source Demonstration Report for the Residual Waste Landfill and Fly Ash Reservoir and it meets the requirements of 40 CFR § 257.94(e)(2). To the best of my knowledge, the information contained in this report is true, complete, and accurate.



James A. Hemme, P.E.
State of Ohio License No.: 72851

Date: 12/7/2021



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FIGURES

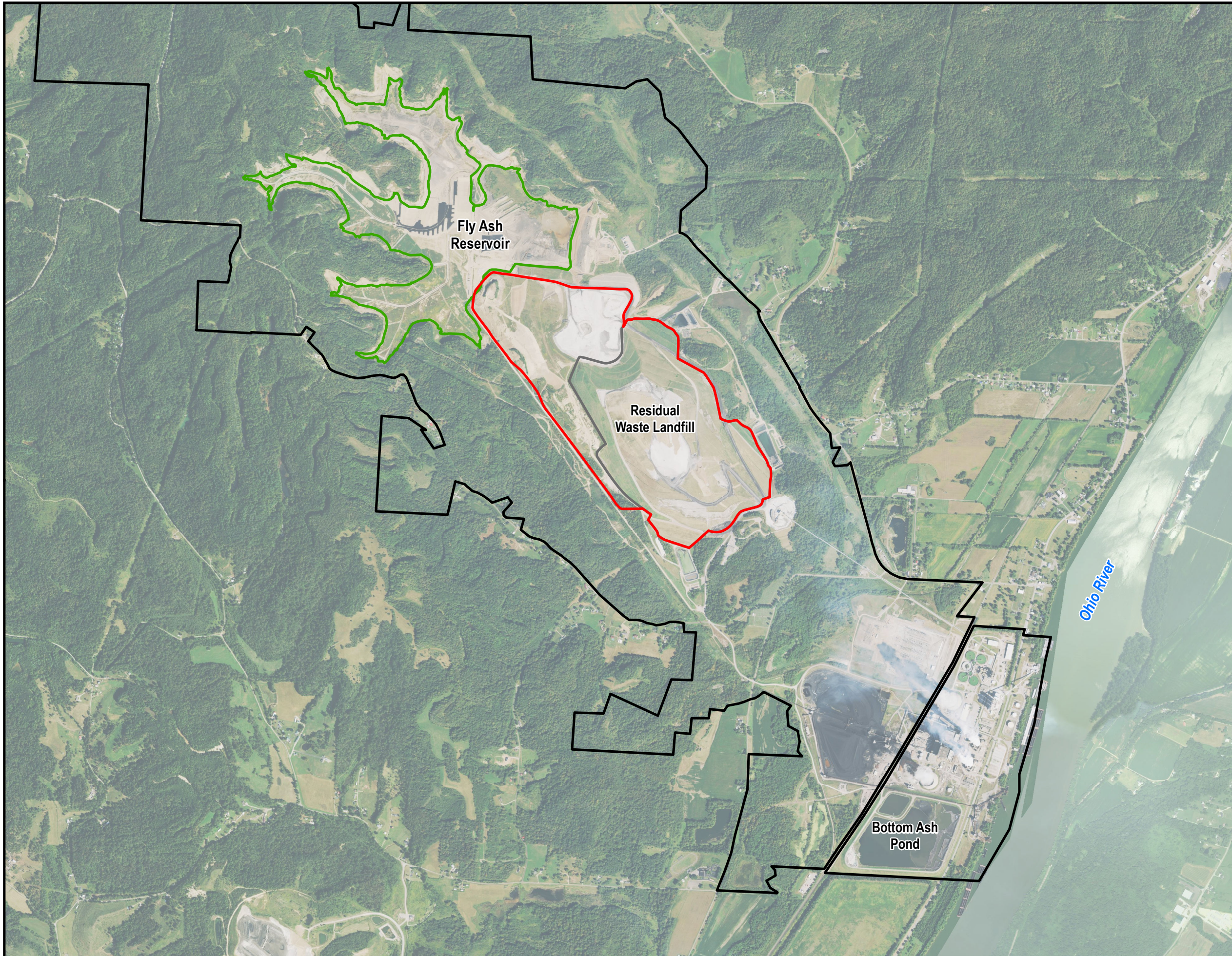


General James M. Gavin Plant

Figure 1-1: Gavin Plant Location
 Gavin Generating Station
 Cheshire, Ohio



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Legend

- Fly Ash Reservoir
- Permitted Limit of Waste
- Previous Limit of Waste
- Gavin Property Boundary

NOTE:

1. Limits of Waste from Revised Gavin RWL Permit-To-Install Application Drawing No. 12-30429-B (Geosyntec 2014)

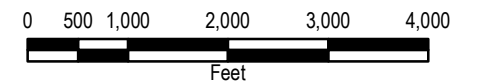
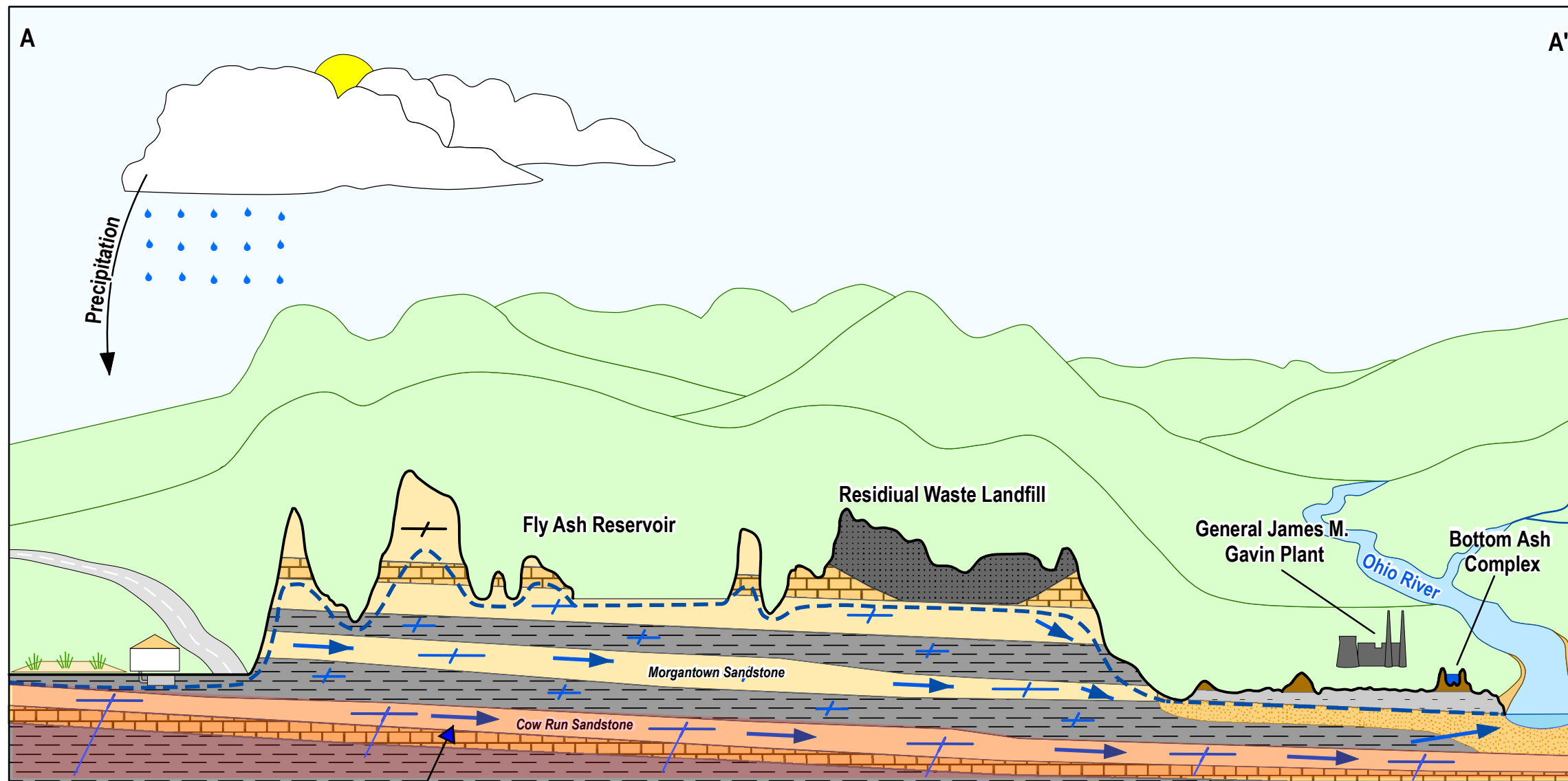
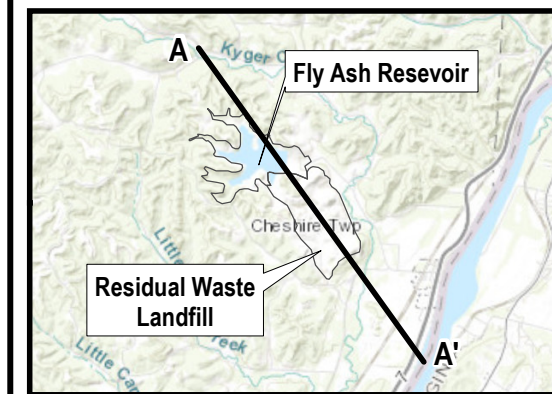


Figure 2-1: Residual Waste Landfill and Fly Ash Reservoir Location
 Gavin Power, LLC
 Cheshire, Ohio





Migration of Naturally Occuring Brine in Cow Run Sandstone



Legend

- Groundwater Flow Direction
- Water Table
- Saturated Fractures
- Unsaturated Fractures
- Naturally Occuring Brine
- FGD Material
- Fill
- Interbedded Silt/Clay
- Sand
- Sandstone
- Fractured Limestone
- Fractured Shale

NOTES:

1. Sandstone bedrock units represent the Conemaugh Group and Monongahela Group Sedimentary Aquifers

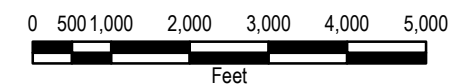


Figure 4-1: Regional Groundwater Flow Patterns

Gavin Power, LLC
Cheshire, Ohio



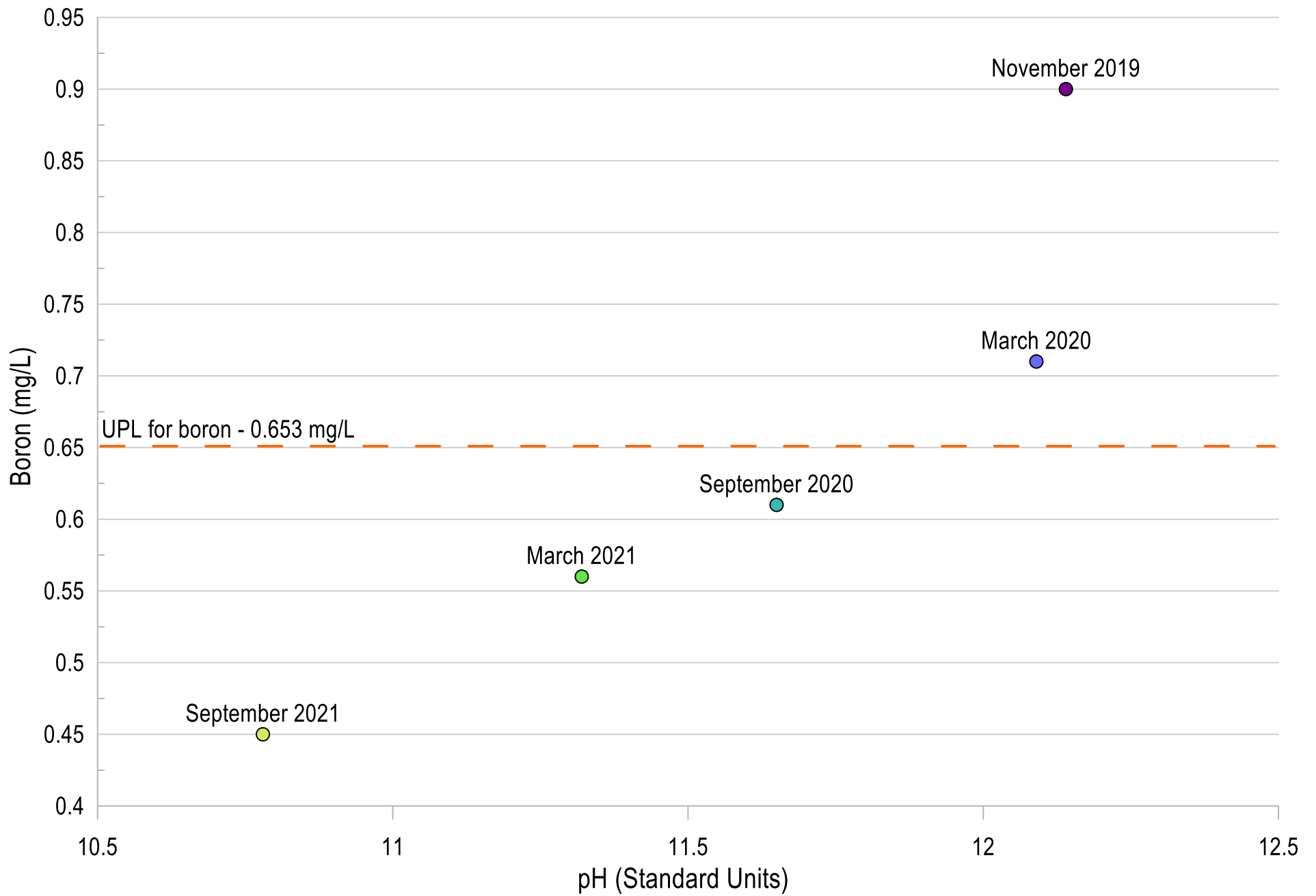
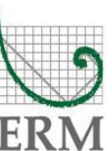
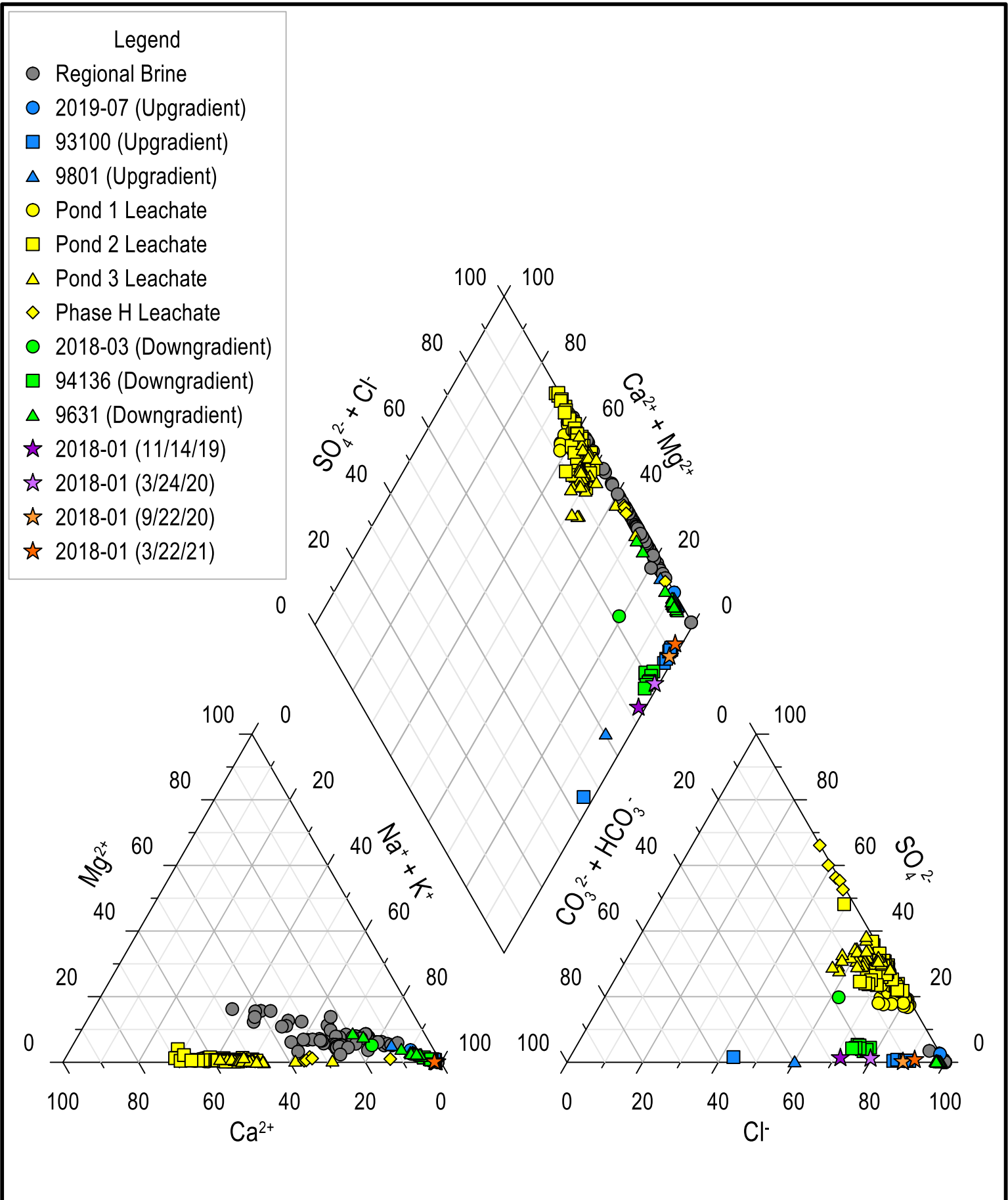


Figure 4-2: Boron and pH at Monitoring Well 2018-01
Gavin Power LLC
Cheshire, Ohio





NOTES:

1. Date Range: January 2010 to June 2021
2. Only wells with complete data including all 8 piper diagram analytes are presented
3. All monitoring wells are screened in the Cow Run Sandstone

Figure 4-3: 2018-01 Piper Diagram

Gavin Power LLC
Cheshire, Ohio



APPENDIX A ANALYTICAL SUMMARY

Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Garvin Power Plant

Analyte	Unit	Program	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL
		Location ID	2000	2000	2000	2000	2000	2000	2000	2000	2000	2000	2000	2000	2000	2000	2003
Sample Type	Date	2016-08-24	2016-10-06	2016-12-01	2017-02-02	2017-03-23	2017-05-01	2017-06-12	2017-07-17	2018-03-15	2018-09-13	2019-03-12	2019-09-24	2020-03-24	2020-09-22	2016-12-01	2017-02-08
Alkalinity, Total as CaCO3	mg/L			417	424	7.8 J	0.18	1.4 B	0.32	380	370	380	380	390	380	709	680
Aluminum	mg/L																
Antimony	mg/L	2E-05 J	1E-05 J	3E-05	0.0001	0.002 U	0.002 U	0.002 U	0.002 U							0.00029	0.0002
Arsenic	mg/L	0.0018	0.00177	0.00153	0.00192	0.0042 J	0.0017 J	0.0024 J	0.0017 J							0.00826	0.0074
Barium	mg/L	0.0244	0.0233	0.019	0.0245	0.078 B	0.022	0.036	0.024							0.175	0.145
Beryllium	mg/L	2E-05 U	5E-06 J	5E-06	2E-05 U	0.00042 J	0.001 U	0.001 U	0.001 U							0.000166	0.000162
Bicarbonate Alkalinity as CaCO3	mg/L									350	330		340	350	350		
Bicarbonate Alkalinity as HCO3	mg/L											350					
Boron	mg/L	0.289	0.278	0.296	0.283	0.33	0.33	0.34	0.35 JB	0.32		0.34	0.31	0.29	0.32	0.461	0.462
Bromide	mg/L			0.412	0.334	0.41 J	5 U	2.5 U	2.5 U							2.7	2.25
Cadmium	mg/L	2E-05 U	5E-06 J	1E-05	5E-05	0.001 U	0.001 U	0.001 U	0.001 U							8E-05	6E-05
Calcium	mg/L	2.7	2.78	2.64	2.57	3.9 B	2.5	3.2	2.6	2.6	2.8	2.6	2.6	2.5	2.7	8.98	8.37
Carbonate Alkalinity as CaCO3	mg/L									34	34	34	38	41	29		
Chloride	mg/L	83.9	92	96.9	96.3	96	60	79	62	86	96	93	100	110	87	643	700
Chromium	mg/L	0.0018	0.0033	0.0007	0.00263	0.06	0.0019 J	0.0081	0.0019 J							0.0011	0.0839
Cobalt	mg/L	0.00011	0.000202	4.6E-05	0.000151	0.0052	0.00026 J	0.0011	0.00042 J							0.00251	0.00382
Conductivity, Field	uS/cm	2068	2149	2094	2158					2079				2014	1990	3638	3676
Copper	mg/L					0.01 B	0.002 U	0.0048 B	0.002 U								
Dissolved Oxygen, Field	mg/L	0.88	3.16	1.59	1.86					0.2						1.03	1.28
Dissolved Solids, Total	mg/L	1220	1300	1290	1290	1300 J	1200 J	1300	1300 J	1300		1300	1300	1300	1200	1950	1960
Fluoride	mg/L	1.86	2	2.26	2.13	2.6	2.2	2.4	2.2	2.2	2.3	2.2	2.5	2.4	2.1	2.7	2.36
Iron	mg/L					8.3 JB	0.19	1.5	0.39								
Lead	mg/L	3.9E-05	9.6E-05	4.9E-05	0.000237	0.0052 J	0.00056 J	0.0011	0.00058 J							0.00144	0.00165
Lithium	mg/L	0.02	0.023	0.017	0.014	0.021	0.016	0.018	0.016							0.024	0.019
Magnesium	mg/L			0.724	0.723	2.4 B	0.75 J	1.1	0.8 J	0.66 J	0.69 J	0.76 J	0.74 J	0.73 J	0.64 J	2.26	2.65
Manganese	mg/L					0.084	0.01	0.026	0.014								
Mercury	mg/L	5E-06 U	5E-06 U	2E-06	5E-06 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U							1.7E-05	5E-06 U
Molybdenum	mg/L	0.0389	0.0349	0.0331	0.0345	0.037	0.033	0.033	0.032							0.105	0.125
Nickel	mg/L					0.039	0.002 U	0.0056	0.0018 J								
pH, Field	pH units	7.28	8.89	8.6	8.59	8.69	8.58	8.55	8.61	8.71	8.6	8.85	8.83	8.85	8.79	8.02	7.84
Potassium	mg/L			1.05	1.49	2.6 B	0.92 J	1.2	0.91 J	0.84 J	1	0.93 J	0.9 J	0.98 J	0.87 J	2.61	3.22
Radium-226	pCi/L	0.356	0.547	0.32	0.257	0.303	0.116	0.147	0.171							0.555	0.193
Radium-226/228	pCi/L	1.348	1.827	0.595	0.701	0.497	0.339	0.539	0.53							0.975	1.483
Radium-228	pCi/L	0.992	1.28	0.275	0.444	0.194 U	0.224 U	0.393	0.359							0.42	1.29
Redox Potential, Field	mV	167.6	70.5	-68	88.2											4	-122.2
Selenium	mg/L	7E-05 J	4E-05 J	5E-05	0.0001 U	0.00073 J	0.005 U	0.005 U	0.005 U							0.0013	0.0011
Silver	mg/L					0.0005 J	0.001 U	0.001 U	0.001 U								
Sodium	mg/L			414	405	440 JB	480 B	460 B	440 JB	440	460	470	490	430	450	605	628
Strontium	mg/L			0.199	0.19	0.22 B	0.19 B	0.2 B	0.19							0.593	0.567
Sulfate	mg/L	493	516	567	521	560 J	570	560	560	560	570	570	540	540	530	77.8	65.3
Temperature, Field	deg C	15.16	18.6	15.2	12.4					13.1				13	16	12.5	13.1
Thallium	mg/L	2E-05 J	4E-05 J	1E-05	5.2E-05	0.001 U	0.001 U	0.001 U	0.001 U							4E-05	3E-05 J
Turbidity, Field	NTU	3.3	5.1	6.7	1.9	61.2	28.9	31.1	5.7	1.2	1.96		3	16.5	0.3	123.9	265.2
Vanadium	mg/L					0.013			0.005 U								
Zinc	mg/L					0.026	0.02 U	0.02 U	0.02 U								

Notes:
 FD = Field duplicate sample
 N = Normal environmental sample
 deg C = Degree Celsius
 mg/L = Milligrams per liter
 mV = Millivolts
 NTU = Nephelometric Turbidity Unit
 uS/cm = Microsiemens per centimeter
 pCi/L = PicoCuries per liter
 B: Compound was found in the blank and sample.
 J: Result is less than the reporting limit but greater than or equal to the method detection limit and the concentration is an approximate value.
 U: Indicates the analyte was analyzed for but not detected.
 Empty cells = Not analyzed

Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Analyte	Unit	Program	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL
		Location ID	2003	2003	2003	2003	2003	2003	2003	2016-03	2016-03	2016-03	2016-03	2016-03	2016-03	2016-03	2016-03
Sample Type	Date	2017-03-27	2017-05-01	2017-06-12	2018-10-29	2019-09-21	2020-03-24	2020-09-21	2016-08-24	2016-10-03	2016-12-01	2017-01-31	2017-03-27	2017-04-27	2017-06-07	2017-07-14	2018-03-21
Alkalinity, Total as CaCO3	mg/L				730	740	750	760			482	443					430
Aluminum	mg/L	61 J	34	27	28								0.03 J	0.05 U	0.05 U	0.045 J	
Antimony	mg/L	0.0014 JB	0.00087 J	0.00074 J	0.00058 J				0.00096	0.00041	0.0004	0.00026	0.002 U	0.002 U	0.002 U	0.002 U	
Arsenic	mg/L	0.03	0.019	0.02	0.021				0.00059	0.00092	0.0007	0.00063	0.00058 J	0.001 J	0.00082 J	0.00088 J	
Barium	mg/L	0.41 B	0.39	0.29	0.2				0.0321	0.0383	0.0256	0.0241	0.026 JB	0.024	0.026	0.025	
Beryllium	mg/L	0.0031	0.0022	0.0016	0.0011				1E-05 J	7.2E-05	1E-05 J	6E-06 J	0.001 U	0.001 U	0.001 U	0.001 U	
Bicarbonate Alkalinity as CaCO3	mg/L				710	710	710	730									430
Bicarbonate Alkalinity as HCO3	mg/L																
Boron	mg/L	0.46	0.48	0.51	0.48	0.44	0.41	0.45	0.43	0.35	0.361	0.416	0.43	0.44 B	0.45	0.44	0.43
Bromide	mg/L	2.6 J	2.4 J	2 J							0.614	3.5	0.4 J	2.5 U	2.5 U	2.5 U	
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U				0.00012	0.0001	0.00016	6E-05	0.001 U	0.001 U	0.001 U	0.001 U	
Calcium	mg/L	12 B	15	12	7.5	5.8	5	5.7	149	129	128	134	140 B	140	150	140	140
Carbonate Alkalinity as CaCO3	mg/L				27	21	34	28									5 U
Chloride	mg/L	650	690	560	430	390	500	440	21.7	21.8	22.7	867	22	23	22 J	22	24
Chromium	mg/L	0.11 B	0.058	0.055	0.037				0.0002	0.0002	0.000162	0.000852	0.00064 JB	0.002 U	0.002 U	0.002 U	
Cobalt	mg/L	0.023	0.014	0.013	0.0075				0.000403	0.000563	0.0005	0.000246	0.00029 J	0.00055 J	0.00019 J	0.00034 J	
Conductivity, Field	uS/cm						2692	2760	1564	1599	1595	1328					1511
Copper	mg/L	0.023 B	0.018 B	0.019 B	0.0076								0.0018 JB	0.002 U	0.002 U	0.002 U	
Dissolved Oxygen, Field	mg/L								4.38	1.15	1.77	2.38					0.26
Dissolved Solids, Total	mg/L	2100 J	2400 J	2100	1800	1600	1400	1600	1090	1080	1020	1990	1100	1100 J	1000	1000 J	1100
Fluoride	mg/L	2.9	2.8	2.7	3.2	3.6	3.4	3.2	0.2	0.18	0.16	2.33	0.21 J	0.19 J	0.21 J	0.19 J	0.24
Iron	mg/L	67 JB	38	36	19								0.087 JB	0.068 J	0.064 J	0.087 J	
Lead	mg/L	0.031 J	0.019	0.018	0.0097				0.000324	0.000456	0.000213	0.000105	0.00026 J	0.001 U	0.001 U	0.001 U	
Lithium	mg/L	0.084	0.05	0.051	0.051				0.03	0.03	0.034	0.031	0.029	0.034	0.029	0.034	
Magnesium	mg/L	9.6 B	7.3	5.9	4	1.5	1.3	1.6			38.6	40.5	40 B	40	46	40	40
Manganese	mg/L	0.21 B	0.17	0.13	0.062								0.051 B	0.1	0.11	0.061	
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U				1.1E-05	4E-05	3.9E-05	1.8E-05	0.0002 U	0.0002 U	0.0002 U	0.0002 U	
Molybdenum	mg/L	0.12	0.1	0.12 J	0.16				0.0154	0.00646	0.00649	0.00523	0.0049 J	0.0043 J	0.004 J	0.0038 J	
Nickel	mg/L	0.074 B	0.039	0.04	0.025								0.0015 JB	0.002 U	0.002 U	0.002 U	
pH, Field	pH units	7.94	7.87	7.83	8.06	8.19	8.26	8.21	7.07	6.91	6.99	6.93	6.93	6.9	6.88	6.93	7.03
Potassium	mg/L	11 B	7.2	6	5.9	1.8	1.5	2			4.63	5.03	4.3 JB	4.4	4.8	4.6	4.6
Radium-226	pCi/L	0.937	0.45	1.48	0.909				0.306	0.225	0.266	0.854	0.194	0.195	0.201	0.207	
Radium-226/228	pCi/L	2.93	0.95	2.05	1.71				0.409	1.295	0.44	1.121	0.456	0.541	0.59	1.02	
Radium-228	pCi/L	2 G	0.5 U	0.57 U	0.797				0.103	1.07	0.174	0.267	0.262 U	0.347	0.389	0.816	
Redox Potential, Field	mV								20.9	48.2	50.5	73.5					
Selenium	mg/L	0.0068	0.0034 J	0.0046 J	0.0017 J				0.0002	0.0003	0.0001	0.0001	0.005 U	0.005 U	0.005 U	0.005 U	
Silver	mg/L	0.00074 J	0.00023 J	0.00061 J	0.0005 J								3E-05 J	0.001 U	0.00041 J	0.00044 J	
Sodium	mg/L	730 JB	740 B	730	630	620	590	610					171	156	150 JB	160 B	150 B
Strontium	mg/L	0.84 B	0.94 B	0.69 B	0.52						2.95	3.25	3.6 JB	3.7	4.4 B	3.4 J	
Sulfate	mg/L	84 J	84	86	73	74	72	84	446	445	362	132	390	420	440 J	400	
Temperature, Field	deg C						14	16	15.8	15.6	12.8	13					12.6
Thallium	mg/L	0.00031 J	0.001 U	0.001 U	0.0002 J				2E-05 J	3E-05 J	2E-05 J	2E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	
Turbidity, Field	NTU	530.1	336.7	236.9	1000	60	24.3	43.1	6.4	9	8.1	4.9	2.1	1.3	1.4	6.4	1
Vanadium	mg/L																
Zinc	mg/L	0.11	0.07	0.059	0.041								0.02 U	0.02 U	0.02 U	0.02 U	

Notes:
 FD = Field duplicate sample
 N = Normal environmental sample
 deg C = Degree Celsius
 mg/L = Milligrams per liter
 mV = Millivolts
 NTU = Nephelometric Turbidity Unit
 uS/cm = Microsiemens per centimeter
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Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Analyte	Unit	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL
		2016-03 2018-09-25 N	2016-03 2019-03-15 N	2016-03 2019-09-24 N	2016-03 2020-03-25 N	2016-03 2020-09-21 N	2016-04 2016-08-24 N	2016-04 2017-01-31 N	2016-04 2017-03-27 N	2016-04 2017-04-27 N	2016-04 2017-06-07 N	2016-04 2017-07-14 N	2016-04 2018-03-22 N	2016-04 2018-09-11 N	2016-04 2019-03-15 N	2016-04 2019-09-24 N	2016-04 2020-03-25 N
Alkalinity, Total as CaCO3	mg/L	430	440 B	450	500	340		50.7						250	290 B	300	340
Aluminum	mg/L								0.39 J	0.05 U	0.058	0.05 U					
Antimony	mg/L						0.00116	0.00033	0.00067 JB	0.00087 J	0.002 U	0.00097 J		0.002 U	0.002 U		
Arsenic	mg/L						0.00421	0.00259	0.0054	0.0044 J	0.0019 J	0.0039 J		0.0016 J	0.0015 J		
Barium	mg/L						0.117	0.065	0.14 JB	0.16	0.41	0.24		0.091	0.077		
Beryllium	mg/L						4E-05 U	2.2E-05	0.001 U	0.001 U	0.001 U	0.00038 J		0.00058 J	0.00085 J		
Bicarbonate Alkalinity as CaCO3	mg/L	430	440 B	450	500	340								250	290 B	300	340
Bicarbonate Alkalinity as HCO3	mg/L																
Boron	mg/L	0.43	0.41	0.39	1.6	1.7	0.343	0.227	0.27	0.27 B	0.36	0.3		0.38	0.39	0.39	0.87
Bromide	mg/L							0.896	4 J	7.4 J	9.3 J	4.8 J			1		
Cadmium	mg/L						5E-05	7E-05	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.00021 J		
Calcium	mg/L	140	120	130	290	330	9.88	47.6	22 B	18	33	24		87	93	96	120
Carbonate Alkalinity as CaCO3	mg/L	5 U	5 U	5 U	5 U	5 U								5 U	5 U	5 U	5 U
Chloride	mg/L	23	23	24	32	50	1060	204	820	1700	2100 J	1100		240	180	200	380
Chromium	mg/L						0.0305	0.00651	0.0054 JB	0.0027	0.002 U	0.0016 J		0.002 U	0.002 U		
Cobalt	mg/L						0.000641	0.000173	0.00026 J	0.001 U	0.001 U	0.00027 J		0.001 U	0.00031 J		
Conductivity, Field	uS/cm				2101	2232	6270	1328						2138			2822
Copper	mg/L								0.0024 B	0.002 U	0.002 U	0.002 U					
Dissolved Oxygen, Field	mg/L						1.04	2.38					3.92				
Dissolved Solids, Total	mg/L	1000	1000	1000	1300	1800	2630	952	1900	3300 J	3600	2400 J		1100	1200	920	1500
Fluoride	mg/L	0.22	0.19	0.23	0.19	0.13	1.28	0.5	1.4	1.2	1.2 J	1.1		0.36	0.29	0.32	0.45
Iron	mg/L								0.38 JB	0.1 U	0.1 U	0.1 U					
Lead	mg/L						0.000238	0.000454	0.00043 J	0.001 U	0.001 U	0.00055 J		0.001 U	0.001 U		
Lithium	mg/L						0.236	0.035	0.044	0.072	0.066	0.066		0.053	0.05		
Magnesium	mg/L	41	40	42	81	81		6.97	3.8 B	4.2	13	5.8				38	39
Manganese	mg/L								0.0083 B	0.005	0.022	0.01					
Mercury	mg/L						1.3E-05	7E-06	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U		
Molybdenum	mg/L						0.0864	0.0728	0.12 J	0.11	0.051	0.093		0.015	0.01		
Nickel	mg/L								0.0034 B	0.002 U	0.002 U	0.0015 J					
pH, Field	pH units	7	7.13	7.27	6.93	6.82	8.4	6.93	7.79	7.82	7.8	8.22	7.75	7.62	7.62	7.71	7.76
Potassium	mg/L	4.6	8.4	5.3	6.2	6.3		7.01	7.3 JB	13	7.2	9.3				8.6	7.4
Radium-226	pCi/L						0.656	0.617	0.823	0.651	0.481	0.552 J		0.247	0.307		
Radium-226/228	pCi/L						1.08	1.328	1.51	1.27	1.19	1.21		0.512	0.482		
Radium-228	pCi/L						0.424	0.711	0.689	0.614	0.71	0.663		0.265 U	0.175 U		
Redox Potential, Field	mV						-174.3	73.5									
Selenium	mg/L						0.0021	0.0007	0.0026 J	0.0022 J	0.005 U	0.0032 J		0.005 U	0.005 U		
Silver	mg/L								0.00016 J	0.001 U	0.00017 J	7E-05 J					
Sodium	mg/L	150	190	190	150	110		219	670 JB	710	1400 B	880 B				260	380
Strontium	mg/L							1.34	0.94 JB	1.3	1.5 B	1.5					
Sulfate	mg/L	410	400	360	980	1200	252	326	330	230	190 J	290		420	410	390	520
Temperature, Field	deg C				14	14	15.2	13					12.3				13
Thallium	mg/L						3E-05 J	1E-05 J	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U		
Turbidity, Field	NTU	1.68		4	1	4	9.1	4.9	6.4	2.8	2.8	6.4	3	1.28		4	60.9
Vanadium	mg/L																
Zinc	mg/L								0.02 U	0.02 U	0.02 U	0.02 U					

Notes:
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Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Program Location ID Date Sample Type	FEDERAL 2016-04 2020-09-21	FEDERAL 2016-05 2016-06-08	FEDERAL 2016-05 2016-08-25	FEDERAL 2016-05 2016-10-05	FEDERAL 2016-05 2016-12-01	FEDERAL 2016-05 2017-02-01	FEDERAL 2016-05 2017-03-27	FEDERAL 2016-05 2017-04-27	FEDERAL 2016-05 2017-06-08	FEDERAL 2016-05 2017-07-14	FEDERAL 2016-06 2016-08-25	FEDERAL 2016-06 2016-10-03	FEDERAL 2016-06 2016-12-01	FEDERAL 2016-06 2017-02-01	FEDERAL 2016-06 2017-03-27	FEDERAL 2016-06 2017-04-27
Alkalinity, Total as CaCO3	280				229	211							490	554		
Aluminum							0.3 J	0.05 U	0.5	0.55					3.7 J	0.17
Antimony			0.00015	0.0001 J	8E-05	4E-05 J	0.002 U	0.00072 J	0.00067 J	0.002 U	0.00019	0.00025	0.00023	0.00026	0.00047 JB	0.00078 J
Arsenic			0.00078	0.00074	0.00051	0.00028	0.005 U	0.005 U	0.00088 J	0.00079 J	0.00225	0.0023	0.00195	0.00214	0.0034 J	0.0017 J
Barium			0.052	0.0432	0.0382	0.0331	0.049 JB	0.043	0.044 B	0.038	0.0707	0.0649	0.0525	0.0515	0.068 JB	0.05
Beryllium			0.000107	6E-05 J	3.4E-05	8E-06 J	0.001 U	0.001 U	0.00067 J	0.001 U	0.000198	0.000143	3.4E-05	6.8E-05	0.001 U	0.001 U
Bicarbonate Alkalinity as CaCO3	280															
Bicarbonate Alkalinity as HCO3																
Boron	0.75		0.116	0.088	0.088	0.11	0.1	0.1 JB	0.11	0.1	0.501	0.424	0.418	0.463	0.5	0.52 B
Bromide					0.552	0.155	0.17 J	0.15 J	0.23 J	0.26 J			2.18	1.85	2.4 J	2.1 J
Cadmium			3E-05	2E-05 J	1E-05 J	8E-06 J	0.001 U	0.001 U	0.001 U	0.001 U	1E-05 J	2E-05 J	3E-05	4E-05	0.00061 J	0.001 U
Calcium	120		40.2	35.8	45	39.7	66 B	53	40	31	5.87	5.51	4.6	4.45	5 B	3.5
Carbonate Alkalinity as CaCO3	5 U															
Chloride	1000		16.3	17.2	16.9	11.4	9.2	9.6	14	16	545	560	515	548	550	550
Chromium			0.0015	0.0012	0.000802	0.000582	0.0017 JB	0.002 U	0.0033	0.0025	0.0092	0.077	0.0205	0.0625	0.068 JB	0.022
Cobalt			0.00299	0.00267	0.00158	0.000274	0.00042 J	0.00028 J	0.0011	0.00088 J	0.00208	0.00283	0.00156	0.00106	0.0019	0.00068 J
Conductivity, Field	uS/cm	6404	717	670	694	708					2898	2931	3126	2933		
Copper							0.00073 JB	0.002 U	0.0039	0.0042 B					0.005 JB	0.002 U
Dissolved Oxygen, Field			7.62	8.64	7.9	9.83					0.6	0.58	1.02	1.4		
Dissolved Solids, Total		2400	474	406	430	388	500	460 J	410	400 J	1560	1560	1570	1540	1600	1600 J
Fluoride	0.73		0.19	0.19	0.19	0.18	0.2	0.21	0.22	0.22	5.28	5.09	4.89	5.2	6	5.9
Iron							0.45 JB	0.1 U	0.93	0.78					3.4 JB	0.24
Lead			0.00194	0.00137	0.000848	0.000206	0.00036 J	0.001 U	0.0012	0.00077 J	0.00371	0.00151	0.00039	0.000607	0.0016 J	0.001 U
Lithium			0.019	0.016	0.011	0.012	0.011	0.013	0.012	0.014	0.029	0.024	0.027	0.034	0.034	0.032
Magnesium	36				18.1	19.6	22 B	20	19	16			1.28	1.4	1.7 B	1
Manganese							0.0099 B	0.005 U	0.022	0.02					0.022 B	0.0068
Mercury			8E-06	1E-05	1.7E-05	5E-06 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	5E-06 J	1.1E-05	1.6E-05	3E-06 J	0.0002 U	0.0002 U
Molybdenum			0.00109	0.00115	0.00231	0.00071	0.00064 J	0.01 U	0.0012 J	0.01 U	0.0595	0.0952	0.0674	0.0804	0.091 J	0.076
Nickel							0.0013 JB	0.002 U	0.0026	0.0027					0.031 B	0.029
pH, Field	pH units	8.56	7.88	7.89	7.93	7.79	7.8	7.48	7.82	8.01	8.51	8.36	8.36	8.45	8.44	8.49
Potassium	mg/L	16			2.72	2.35	2.4 JB	2.3	2.5	2.3			3.45	10.5	7.2 JB	6
Radium-226	pCi/L		0.5	0.369	0.299	0.4	0.176	0.14	0.0681 U	0.13	0.325	0.818	0.392	0.252	0.163	0.163
Radium-226/228	pCi/L		1.027	0.703	1.429	0.40713	0.365 U	0.0784 U	0.0846 U	0.575	0.756	2.268	1.052	0.604	0.381	0.395
Radium-228	pCi/L		0.527	0.334	1.13	0.00713	0.189 U	-0.0618 U	0.0165 U	0.445	0.431	1.45	0.66	0.352	0.217 U	0.232 U
Redox Potential, Field	mV		162.5	206.5	119.4	162.7					72.2	60.6	79.4	107.6		
Selenium	mg/L		0.0005	0.0005	0.0002	0.0001	0.005 U	0.005 U	0.005 U	0.005 U	0.0003	0.0002	0.0003	0.0003	0.005 U	0.005 U
Silver	mg/L						0.001 U	0.001 U	0.001 U	0.0013					0.0012	0.001 U
Sodium	mg/L	980			84.5	69.3	71 JB	74 B	82	74 B			637	499	610 JB	620
Strontium	mg/L				0.879	0.89	1.1 JB	1.1	0.87 B	0.81			0.274	0.269	0.3 JB	0.29
Sulfate	mg/L	750		138	120	116	132	150	160	140	130	103	96.5	95.1	94.8	110
Temperature, Field	deg C	14		18.2	16.8	13	11.8				19.1	16	12.9	12		
Thallium	mg/L			2E-05 J	0.0002 U	2E-05 J	3E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	3E-05 J	2E-05 J	2E-05 J	2E-05 J	0.001 U
Turbidity, Field	NTU		8.5	280.1	160.9	56.6	9.6	5.4	13.6		7.7	99.6	45.2	52.9	48.5	43.5
Vanadium	mg/L															
Zinc	mg/L						0.02 U	0.02 U	0.02 U	0.02 U					0.0097 J	0.02 U

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Gavin Power Plant

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		2016-06 2017-06-08 N	2016-06 2017-07-14 N	2016-06 2018-03-22 N	2016-06 2018-09-25 FD	2016-06 2018-09-25 N	2016-06 2019-03-26 N	2016-06 2019-09-22 N	2016-06 2020-03-15 FD	2016-06 2020-03-15 N	2016-06 2020-09-17 N	2016-07 2016-08-24 N	2016-07 2016-10-05 N	2016-07 2016-11-30 N	2016-07 2017-01-31 N	2016-07 2017-03-22 N	2016-07 2017-04-27 N	
Alkalinity, Total as CaCO3	mg/L				490	490	510	500	510	510	480		514	483				
Aluminum	mg/L	3.6	1.7													57 J	9.8	
Antimony	mg/L	0.002 U	0.002 U										0.00126	0.00091	0.00079	0.00045	0.0015 J	0.0024
Arsenic	mg/L	0.0026 J	0.0024 J										0.00772	0.00705	0.00666	0.0042	0.016	0.0034 J
Barium	mg/L	0.064 B	0.059										0.107	0.141	0.115	0.188	0.83 JB	0.7
Beryllium	mg/L	0.00035 J	0.001 U										0.000368	0.00027	0.000183	0.000428	0.0026	0.00091 J
Bicarbonate Alkalinity as CaCO3	mg/L				460	470	460	470	470	470	460							
Bicarbonate Alkalinity as HCO3	mg/L																	
Boron	mg/L	0.52	0.5		0.48	0.49	0.5	0.45	0.46	0.48	0.46	0.313	0.297	0.348	0.365	0.4	0.42 B	
Bromide	mg/L	2.3 J	2.1 J											5.48	0.308	4.5 J	8 J	
Cadmium	mg/L	0.001 U	0.001 U										7E-05	8E-05 J	0.0001	8E-05	0.001 U	0.001 U
Calcium	mg/L	4.1	4		4.4	4.8	4.9	4.4	4.1	4.2	5.1	13.3	11.5	8.2	9.9	15 B	25	
Carbonate Alkalinity as CaCO3	mg/L				26	23	41	35	36	36	24							
Chloride	mg/L	570	540		600	620	580	540	650	660	630	421	609	643	23.6	1000	1900	
Chromium	mg/L	0.058 J	0.062										0.0015	0.0022	0.00163	0.00322	0.063 J	0.011
Cobalt	mg/L	0.0038	0.0018										0.00105	0.000905	0.000573	0.00167	0.016	0.0028
Conductivity, Field	uS/cm			2792					2888	2888	2979	2883	3250	2246	3388			
Copper	mg/L	0.0071	0.007 B														0.044 JB	0.0079
Dissolved Oxygen, Field	mg/L			0.38								3.47	3.81	3.75	1.94			
Dissolved Solids, Total	mg/L	1700	1600 J		1400	1400	1600	1500	1600	1600	1400	1740	1850	1900	1000	2300	3900 J	
Fluoride	mg/L	6.3	6.1		5.8	5.7	5.6	5.8	5.5	5.5	5.5	1.89	2.04	1.94	0.18	2.3	1.6	
Iron	mg/L	3.3	1.7													49 JB	8.5	
Lead	mg/L	0.0013	0.00083 J										0.00336	0.00292	0.00215	0.00336	0.031 J	0.0054
Lithium	mg/L	0.031	0.032										0.235	0.193	0.202	0.163	0.16	0.062
Magnesium	mg/L	1.8	1.3		1.4	1.4	1.6	1.4	1.3	1.4	1.5			1.36	2.83	11 B	8.3	
Manganese	mg/L	0.019	0.018													0.24 B	0.075	
Mercury	mg/L	0.0002 U	0.0002 U									1.2E-05	1.7E-05	8E-06	5E-05 J	0.0002 U	0.0002 U	
Molybdenum	mg/L	0.074	0.073									0.0808	0.0841	0.0953	0.0689	0.092 J	0.056	
Nickel	mg/L	0.13	0.05													0.043	0.0086	
pH, Field	pH units	8.39	8.28	8.43		8.24	8.52	8.59	8.47	8.47	8.52	10.86	10.56	10.61	10.01	9.94	9.44	
Potassium	mg/L	5.6	4.8		3	3.4	4.8	3.8	2.7	2.9	2.9			33.9	24.1	23 JB	6.5	
Radium-226	pCi/L	0.195	0.152									0.427	0.977	1.13	1.18	2.63	6.4	
Radium-226/228	pCi/L	0.362 U	0.651									0.427	3.077	2.17	2.84	4.35	12.7	
Radium-228	pCi/L	0.167 U	0.498										2.1	1.04	1.66	1.72 G	6.29 G	
Redox Potential, Field	mV											6.4	63	20.4	22			
Selenium	mg/L	0.005 U	0.001 J									0.0008	0.001	0.0007	0.0008	0.004 J	0.0015 J	
Silver	mg/L	9.1E-05 J	0.00017 J													0.00078 J	0.00019 J	
Sodium	mg/L	590	600 B		600	610	600	590	600	610	610			562	635	930 JB	1300	
Strontium	mg/L	0.24 B	0.27											0.624	0.815	1.3 JB	2.3	
Sulfate	mg/L	120	110		100	100	110	110	100	100	99	229	235	178	371	120	99	
Temperature, Field	deg C			13.3					13	13	14	15.6	15.3	14.1	12.8			
Thallium	mg/L	0.001 U	0.001 U									8.4E-05	9E-05 J	4E-05 J	6.1E-05	0.00052 J	0.001 U	
Turbidity, Field	NTU	59.1	30.7	49		43.9		71	37.6	37.6	24.1	213	98.2	88.1	455.1	850	13721	
Vanadium	mg/L															0.066		
Zinc	mg/L	0.02 U	0.02 U													0.12	0.02	

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		Location ID	2016-07	2016-07	2016-07	2016-07	2016-07	2016-07	2016-07	2016-07	2016-07	2016-08	2016-08	2016-08	2016-08	2016-08	2016-08
Sample Type	Date	2017-08-10	2018-04-05	2018-10-23	2019-03-26	2019-09-22	2020-03-15	2020-03-24	2020-09-17	2016-08-24	2016-10-05	2016-11-30	2017-01-31	2017-03-22	2017-04-27	2017-06-07	2018-09-25
Alkalinity, Total as CaCO3	mg/L		360	300	430	320	360	320	350			1580	1400				1700
Aluminum	mg/L	40											4.7 J	0.39	8.1		
Antimony	mg/L	0.0017 JB								0.00134	0.00083	0.00095	0.00078	0.0012 J	0.0051	0.0013 J	
Arsenic	mg/L	0.016								0.00795	0.00691	0.00652	0.00489	0.0054	0.0075	0.014	
Barium	mg/L	1.3								0.312	0.279	0.416	0.446	0.97 JB	0.7	0.76	
Beryllium	mg/L	0.0028								4E-05 U	0.000182	0.000123	5.9E-05 J	0.001 U	0.001 U	0.005 U	
Bicarbonate Alkalinity as CaCO3	mg/L		190	120	72	59	45	5 U	160								5 U
Bicarbonate Alkalinity as HCO3	mg/L																
Boron	mg/L	0.44	0.45	0.42	0.38	0.39	0.41	0.28	0.41	0.318	0.286	0.294	0.279	0.22	0.28 B	0.32	0.1
Bromide	mg/L	5.5										5.56	2.93	3.1 J	25 U	5 J	
Cadmium	mg/L	0.00059 J								2E-05 J	3E-05 J	5E-05	1E-05 J	0.001 U	0.001 U	0.001 U	
Calcium	mg/L	41	12	12	6.3	7.8	6	34	9.7	33.8	48.9	57	80.6	190 B	140	140	340
Carbonate Alkalinity as CaCO3	mg/L		170	180	350	260	310	110	190								140
Chloride	mg/L	1200	1200	1100	810	1000	1100	970	1100	452	645	650	879	700	890	1200 J	920
Chromium	mg/L	0.059								0.0012	0.0033	0.00434	0.00374	0.011 J	0.0027	0.015 J	
Cobalt	mg/L	0.015								0.000353	0.00278	0.00172	0.00095	0.0024	0.00039 J	0.0037	
Conductivity, Field	uS/cm		4913				3442	4166	4034	8521	8800	5904	7708				
Copper	mg/L	0.04 B												0.026 JB	0.019	0.043 B	
Dissolved Oxygen, Field	mg/L		2.48							10.52	5.81	6.2	4.23				
Dissolved Solids, Total	mg/L	2500 J	2300	1800	2100	1900	1800 J	1900	1800	2480	2660	2730	2750	2700	2900 J	3000	2400
Fluoride	mg/L	2.6	2.8	2.9	2.6	3.3	3.1	2.5	3.1	1.92	1.85	1.56	2.03	2	1.8 J	2.3 J	1.4
Iron	mg/L	47												4.5 JB	0.1 U	8.6	
Lead	mg/L	0.036 B								0.000143	0.00216	0.00207	0.000987	0.0044 J	0.001 U	0.006	
Lithium	mg/L	0.19								0.665	0.6	0.702	0.652	0.85	0.75	0.64	
Magnesium	mg/L	12	3.9	3.4	2.6	2.3	2.3	0.88 J	3.1			0.41	0.162	0.75 JB	1 U	1.4	1 U
Manganese	mg/L	0.31												0.031 B	0.005 U	0.051	
Mercury	mg/L	0.0002 U								2.4E-05	7E-06	3.7E-05	9E-06	0.0002 U	0.0002 U	0.0002 U	
Molybdenum	mg/L	0.11 B								0.121	0.0735	0.0982	0.102	0.094 J	0.12	0.14	
Nickel	mg/L	0.051												0.01	0.004	0.013	
pH, Field	pH units	9.1	9.49	9.75	10.41	10.4	9.85	11.98	9.65	12.52	12.41	12.59	12.45	12.65	12.35	12.42	12.45
Potassium	mg/L	19	6.6	6.8	8.4	4.4	4.3	7.4	4.3			92.4	99.3	110 JB	77	59	44
Radium-226	pCi/L	3.74 J								0.768	1.06	0.975	1.43	4.8	4.25	2.11	
Radium-226/228	pCi/L	8.09 J								1.898	2.97	2.005	2.62	6.4	5.53	2.43	
Radium-228	pCi/L	4.34 G								1.13	1.91	1.03	1.19	1.6	1.27	0.319 U	
Redox Potential, Field	mV									-71.6	-38.5	-81.2	-89.5				
Selenium	mg/L	0.0052								0.0028	0.0022	0.0019	0.0012	0.002 J	0.0022 J	0.0043 J	
Silver	mg/L	0.0037												0.001 U	0.001 UJ	0.00026 J	
Sodium	mg/L	1000	920	850	840	760	730	640	790			704	747	920 JB	1100	1200 B	830
Strontium	mg/L	2.8 B										3.59	4.23	7.2 JB	6.7	5.7 B	
Sulfate	mg/L	77	60	49	46	36	36	30	27	133	126	120	90.4	71	70	89 J	27
Temperature, Field	deg C		13.8							13	14	15	16	16.2	13.8	13.1	
Thallium	mg/L	0.00066 J								9E-05 J	7E-05 J	5E-05 J	3E-05 J	0.001 U	0.001 U	0.001 U	
Turbidity, Field	NTU	1037	174	81.4		32	9.8	14.1	7.1	871	253.7	121.7	110.9	108.8	627.3	380.4	17.6
Vanadium	mg/L													0.017			
Zinc	mg/L	0.12												0.1 U	0.02 U	0.03	

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 NTU = Nephelometric Turbidity Unit
 uS/cm = Microsiemens per centimeter
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Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Analyte	Unit	Program	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL
		Location ID	2016-08	2016-08	2016-08	2016-08	2016-08	2016-09	2016-09	2016-09	2016-09	2016-09	2016-09	2016-09	2016-09	2016-09	2016-09
Sample Type	Date	2019-03-26	2019-09-22	2020-03-15	2020-03-24	2020-09-17	2016-08-23	2016-10-03	2016-11-29	2017-01-30	2017-03-21	2017-04-25	2017-06-06	2017-07-12	2018-03-22	2018-09-13	2019-09-24
		N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Alkalinity, Total as CaCO3	mg/L	2000	1800	1100	1900	620			1250	1830	1400					820	1100
Aluminum	mg/L											1.3	3.3	1.9 B			
Antimony	mg/L						0.00076	0.00087	0.00082	0.00078	0.0014 J	0.0012 J	0.02 U	0.001 JB			
Arsenic	mg/L						0.0117	0.0145	0.0149	0.0144	0.026 J	0.016	0.016 J	0.016			
Barium	mg/L						0.684	0.566	0.49	0.433	0.42 JB	0.52	0.53	0.52			
Beryllium	mg/L						8.5E-05	3E-05 J	2E-05 J	2E-05 U	0.001 U	0.001 U	0.001 UJ	0.001 U			
Bicarbonate Alkalinity as CaCO3	mg/L	5 U	5 U	5 U	5 U	5 U										5 U	5 U
Bicarbonate Alkalinity as HCO3	mg/L																
Boron	mg/L	0.056 J	0.071 J	0.24	0.029 J	0.16	0.093	0.411	0.126	0.131	0.19	0.16 J	0.18 B	0.16 B			0.24
Bromide	mg/L								6.45	5.69	5.8 J	50 U	7.5	5.8 J			
Cadmium	mg/L						6E-05 U	6E-05 U	4E-05 J	1E-05 J	0.001 U	0.001 U	0.01 U	0.001 U			
Calcium	mg/L	450	390	190	510	190	78.6	202	49.7	42.3	30 B	35	47	55		16	18
Carbonate Alkalinity as CaCO3	mg/L	70	100	63	48	100										180	120
Chloride	mg/L	510	610	1500	270	1400	1500	1520	1490	1520	1600	2000	1700	1600		1800	1200
Chromium	mg/L						0.0455	0.0371	0.0299	0.0256	0.027 J	0.025	0.029 J	0.025			
Cobalt	mg/L						0.00056	0.000324	0.000245	0.000208	0.00092 J	0.00032 J	0.01 U	0.00071 J			
Conductivity, Field	uS/cm			8027	8693	7699	14047	13957	15285	12613					9465		
Copper	mg/L											0.013	0.022 B	0.017			
Dissolved Oxygen, Field	mg/L						5.1	2.86	2.39	2.91					0.32		
Dissolved Solids, Total	mg/L	2900	2700	2300 J	1700	2300	4820	4480	4180	3900	4100	4300 J	4300	3900 J			2100
Fluoride	mg/L	0.99	1.1	1.6	0.69	1.4	1.67	1.58	1.02	1.39	1.9 J	2.1 J	1.8	1.5 J		2	1.9
Iron	mg/L											0.1 U	1.2	0.55			
Lead	mg/L						0.00215	0.000743	0.000281	0.000118	0.0021 J	0.001 U	0.001	0.00068 J			
Lithium	mg/L						0.561	0.082	0.392	0.324	0.23	0.3	0.27	0.25			
Magnesium	mg/L	1 U	1 U	1 U	1 U	1 U			0.058	0.006 J		1 U	10 U	0.22 J		1 U	1.2
Manganese	mg/L										0.016 B	0.005 U	0.05 U	0.0041 J			
Mercury	mg/L						1.2E-05	4E-06 J	6E-06	5E-06 J	0.0002 U	0.0002 U	0.0002 U	0.0002 U			
Molybdenum	mg/L						0.18	0.155	0.149	0.137	0.19 J	0.17	0.17	0.16			
Nickel	mg/L											0.0015 J	0.02 U	0.0031			
pH, Field	pH units	12.67	12.43	11.89	12.67	12	12.49	12.6	12.64	12.66	12.55	12.44	12.46	12.49	12.59	12.07	12.45
Potassium	mg/L	48	44	23	36	17			55	48.8	28 JB	31	29	24		15	13
Radium-226	pCi/L						1.06	0.889	1.34	1.65	1.95	1.33	1.93	1.83 J			
Radium-226/228	pCi/L						1.924	2.559	1.729	2.472	2.69	2.29	3.76	2.61 J			
Radium-228	pCi/L						0.864	1.67	0.389	0.822	0.744 U	0.966	1.83	0.772 J			
Redox Potential, Field	mV						-68.6	-135.4	-113.7	-112.6							
Selenium	mg/L						0.0042	0.0038	0.0037	0.0029	0.0051 J	0.0029 J	0.05 U	0.0034 JB			
Silver	mg/L											0.001 U	0.00031 J	0.00074 J			
Sodium	mg/L	680	740	1100	310	1100			591	997	1700 JB	1600	1700 B	1500		1600	1200
Strontium	mg/L								2.74	2.34	1.8 JB	2.6	1.4 B	2.2			
Sulfate	mg/L	14	16	28	12	23	77.1	72.2	73	61.7	64	88 J	65	85		74	56
Temperature, Field	deg C			12	14	15	15.9	15	13.5	9.3					12.8		
Thallium	mg/L						7E-05 J	4E-05 J	0.0002 U	4E-05 J	0.001 U	0.001 U	0.001 U	0.001 U			
Turbidity, Field	NTU		94	6.2	4.2	4.1	8.7	8.6	6.8	2.1	22.3	56.3	35.1	61.3	9	20.8	103
Vanadium	mg/L																
Zinc	mg/L											0.02 U	0.2 U	0.02 U			

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Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Analyte	Unit	Program	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL
		Location ID	2016-09	2016-09	2016-10	2016-10	2016-10	2016-10	2016-10	2016-10	2016-10	2016-10	2016-10	2016-10	2016-10	2016-10	2016-10
Sample Type	Date	2020-03-12	2020-09-14	2016-08-23	2016-10-03	2016-11-29	2017-01-30	2017-03-21	2017-04-25	2017-06-06	2017-07-12	2018-04-06	2018-10-01	2019-03-27	2019-09-24	2020-03-30	2020-09-14
		N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	FD
Alkalinity, Total as CaCO3	mg/L	1400	1400			217	199	170				180 B	140	150	130	150	120
Aluminum	mg/L								0.05 U	0.5 U	0.035 JB						
Antimony	mg/L			0.00027	9E-05 J	0.0002 J	0.00023	0.002 U	0.002 U	0.02 U	0.002 U						
Arsenic	mg/L			0.00323	0.00281	0.00304	0.00443	0.0037 J	0.0025 J	0.05 U	0.0039 J						
Barium	mg/L			0.235	0.183	0.162	0.339	0.17 JB	0.17	0.25	0.24						
Beryllium	mg/L			8E-05 U	0.0001 U	0.0002 U	1E-05 J	0.001 U	0.001 U	0.001 UJ	0.001 U						
Bicarbonate Alkalinity as CaCO3	mg/L	5 U	5 U									180 B	140	150	130	150	120
Bicarbonate Alkalinity as HCO3	mg/L																
Boron	mg/L	0.21	0.13	0.449	0.386	0.438	0.421	0.56	0.49	0.57 B	0.54 B	0.55	0.52	0.51	0.47	0.48	0.5
Bromide	mg/L					30.4	35.8	35	53	50	49						
Cadmium	mg/L			4E-05 J	0.0001 U	4E-05 J	0.00026	0.001 U	0.001 U	0.01 U	0.001 U						
Calcium	mg/L	230	79	179	209	254	344	380 B	390	440	500	610	650	550	710	730	680
Carbonate Alkalinity as CaCO3	mg/L	120	180									50 U	5 U	5 U	5 U	5 U	5 U
Chloride	mg/L	630	760	3600	5000	6040	7380	7800	12000	11000	12000	14000	16000	13000	15000	18000	16000
Chromium	mg/L			0.0007	0.0003	0.00461	0.00983	0.00071 J	0.002 U	0.02 U	0.0011 J						
Cobalt	mg/L			0.000699	0.000869	0.00198	0.00275	0.0015	0.0013	0.0069 J	0.0046						
Conductivity, Field	uS/cm	8091	8864	8802	16158	15133	19419					35660				36786	37634
Copper	mg/L								0.002 U	0.02 U	0.002 U						
Dissolved Oxygen, Field	mg/L			3.72	2.77	6.96	4.79					1.53					
Dissolved Solids, Total	mg/L	2300	2200	6820	9040	11000	12600	9600	17000 J	17000	15000 J	20000	23000	16000	24000	37000	26000
Fluoride	mg/L	1.1	0.92	0.66	0.5	0.5 J	0.7 J	2.5 U	5 U	1.3 U	2.5 U	5 U	2.5 U	2.9	2.5 U	2.5 U	0.31 J
Iron	mg/L								0.13	2.9	2.8						
Lead	mg/L			0.00143	0.000325	0.000492	0.00257	0.00056 J	0.001 U	0.001 U	0.001 U						
Lithium	mg/L			0.138	0.142	0.189	0.246	0.21	0.23	0.29	0.29						
Magnesium	mg/L	0.75 J	0.33 J			67.4	91.1		110	160	160	200	210	190	330	220	230
Manganese	mg/L							0.68 B	0.52	1.8	1.4						
Mercury	mg/L			4E-06 J	5E-06 U	2E-06 J	3E-06 J	0.0002 U	0.0002 U	0.0002 U	0.0002 U						
Molybdenum	mg/L			0.0367	0.0128	0.0278	0.0258	0.011 J	0.015	0.011 J	0.016						
Nickel	mg/L								0.0053	0.02 U	0.024						
pH, Field	pH units	12.61	12.6	9.79	7.48	8.29	7.68	7.31	7.21	7.51	7.86	7.1	7.11	7.25	7.27	7.35	7.46
Potassium	mg/L	21	12			30.8	42.9	26 JB	28	29	29	28	29	31 F1	42	31	32
Radium-226	pCi/L			1.31	1.47	1.32	0.874	0.869	1.05	1.47	1.61 J						
Radium-226/228	pCi/L			2.85	2.5	3.15	2.304	1.71	2.19	3.93	4.91 J						
Radium-228	pCi/L			1.54	1.03	1.83	1.43	0.839	1.14	2.45	3.29						
Redox Potential, Field	mV			70.1	104.1	122.9	103.2										
Selenium	mg/L			0.001	0.0002 J	0.0005 J	0.0003	0.0015 J	0.005 U	0.05 U	0.0014 JB						
Silver	mg/L								0.001 U	0.0008 J	0.00062 J						
Sodium	mg/L	870	930			1510	1370	4700 JB	4400	5900 B	6000	7300	7100 B	6900	7600	7400	7900
Strontium	mg/L					12.1	16.2	20 JB	21	27 B	26						
Sulfate	mg/L	71	53	874	857	897	834	790	1100	640	670	540	560	550	350	400	320
Temperature, Field	deg C	13	14	16.8	15.9	15	11.3					13.5				14	15
Thallium	mg/L			7E-05 J	0.0002 U	5E-05 U	8E-05 J	0.001 U	0.001 U	0.001 U	0.001 U						
Turbidity, Field	NTU	90.4	37.7	30.6	8.7	2.4	21.9	4.1	77.3	10.1	10.3	4	2.62		7	14	1.3
Vanadium	mg/L																
Zinc	mg/L								0.02 U	0.2 U	0.02 U						

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		Location ID	2016-10	2016-11	2016-11	2016-11	2016-11	2016-11	2018-01	2018-01	2018-01	2018-02	2018-02	2018-02	2018-03	2018-03	2018-03
Sample Type	Date	2020-09-14	2016-08-23	2016-08-26	2017-01-30	2017-03-21	2017-04-25	2019-11-14	2020-03-24	2020-09-22	2019-11-14	2020-04-08	2020-11-16	2019-11-14	2020-04-08	2020-11-16	2019-11-14
Alkalinity, Total as CaCO3	mg/L	120			326	290		800	680	460		260					
Aluminum	mg/L						0.05 U						15				5.8
Antimony	mg/L		0.00533		0.00068	0.002 U	0.00081 J						0.001 J				0.0023
Arsenic	mg/L		0.0038		0.00586	0.0049 J	0.0022 J						0.011				0.012
Barium	mg/L		0.154		0.681	0.33 JB	0.41						1.6				0.48
Beryllium	mg/L		4E-05 U		9.2E-05	0.001 U	0.001 U						0.00085 J				0.0004 J
Bicarbonate Alkalinity as CaCO3	mg/L	120						5 U	5 U	5 U		260					
Bicarbonate Alkalinity as HCO3	mg/L																
Boron	mg/L	0.48	0.278		0.3	0.36	0.35	0.9	0.71	0.61	0.35	0.32	0.38	0.31	0.31	0.32	
Bromide	mg/L				10.5	10	11 J						16				5.6
Cadmium	mg/L		0.0002		0.00027	0.00035 J	0.001 U						0.001 U				0.00027 J
Calcium	mg/L	700	10.3		25	28 B	34	14 B	13	20	49 B	54	57	120 B	34	80	
Carbonate Alkalinity as CaCO3	mg/L	5 U						370	370	340		5 U					
Chloride	mg/L	15000		403	2170	2400	2800	1500	2000	2600	3800	4000	200	5900	1500	52	25
Chromium	mg/L		0.0349		0.00944	0.037 J	0.002 U						0.22				0.016
Cobalt	mg/L		0.000731		0.00238	0.00076 J	0.0013						0.01				0.0033
Conductivity, Field	uS/cm	37634	7110		7954			7311	8200			11760	10750		6569		4938
Copper	mg/L						0.003						0.055				0.012
Dissolved Oxygen, Field	mg/L		7.22		3.52												
Dissolved Solids, Total	mg/L	26000		3060	4400	5200	4900 J	3200	4400	4400	4900	5500	6600	7500	3100	2200	860
Fluoride	mg/L	0.33 J		2.21	2.01	2.4	2.2 J	3.3	3.3	3.3	1.8	1.6	0.4 J	1.3	1.9	0.87	0.8
Iron	mg/L						0.1 U						58				7.7
Lead	mg/L		0.00261		0.00424	0.0054 J	0.001 U						0.0092				0.0033
Lithium	mg/L		0.593		0.086	0.08	0.074						0.075				0.023
Magnesium	mg/L	220			9.05		11	2.3	0.3 J	0.21 J	16	18	19	33	8.7	11	
Manganese	mg/L					0.031 B	0.039						0.39				0.26
Mercury	mg/L		8E-06		8E-06	0.0002 U	0.0002 U										
Molybdenum	mg/L		0.223		0.248	0.14 J	0.14						0.16				0.036
Nickel	mg/L						0.038						0.037				0.017
pH, Field	pH units	7.46	12.23		8.5	8.95	8.35	12.14	12.09	11.65	6.93	7.97	7.96	7.29	8.18	8.15	6.65
Potassium	mg/L	29			32.5	21 JB	15	3.5	2	2.6	8.1	5.6	7.6	6.7	3.5	5.1	
Radium-226	pCi/L		1.44		1.07	0.934	1										
Radium-226/228	pCi/L		2.62		2.041	1.81	1.56										
Radium-228	pCi/L		1.18		0.971	0.872	0.564										
Redox Potential, Field	mV		-93.7		40.3												
Selenium	mg/L		0.0054		0.0007	0.003 J	0.005 U						0.005 U				0.005 U
Silver	mg/L						0.0001 J						0.00046 J				0.00033 J
Sodium	mg/L	8100			911	1800 JB	1800	1100	1300	1600	2200	2400	2200	2800	1300	870	
Strontium	mg/L				1.72	2.1 JB	2.7						4.9				1.9
Sulfate	mg/L	350		529	497	560	750	37	39	5 U	87	65	93	150	250	230	490
Temperature, Field	deg C	15	16.2		12.1				14	16		17	14		18	15	
Thallium	mg/L		0.000266		0.000105	0.001 U	0.001 U						0.001 U				0.001 U
Turbidity, Field	NTU	1.4	7.1		67.4	22.4	73.2	42	20.4	16.8		305	358		35.1	159	
Vanadium	mg/L																
Zinc	mg/L						0.015 J						0.25				0.032

Notes:
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 mV = Millivolts
 NTU = Nephelometric Turbidity Unit
 uS/cm = Microsiemens per centimeter
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Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Analyte	Unit	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	
		2018-04 2020-04-08 N	2018-04 2020-11-16 N	2019-02 2020-09-15 N	2019-06 2020-09-15 N	93100 2016-08-23 N	93100 2016-10-05 N	93100 2016-12-02 N	93100 2017-02-02 N	93100 2017-03-29 N	93100 2017-04-28 N	93100 2017-06-12 N	93100 2017-07-18 FD	93100 2017-07-18 N	93100 2018-03-15 N	93100 2018-09-24 N	93100 2019-03-11 FD	
Alkalinity, Total as CaCO3	mg/L			1800	220			393	359							360	320	320
Aluminum	mg/L		58							1.8 J	0.044 J	3.8 B	1.8	1.7				
Antimony	mg/L		0.0021			4E-05 J	6E-05 J	5E-05 J	5E-05 J	0.0012 J	0.002 U	0.002 U	0.002 U	0.002 U				
Arsenic	mg/L		0.079			0.00164	0.00207	0.00174	0.00156	0.002 J	0.0016 J	0.002 J	0.0019 J	0.002 J				
Barium	mg/L		0.62			0.602	0.69	0.468	0.521	0.64 B	0.65	0.65	0.66	0.66				
Beryllium	mg/L		0.0032			1E-05 J	5.3E-05	1E-05 J	1E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U				
Bicarbonate Alkalinity as CaCO3	mg/L			5 U	220											360	320	
Bicarbonate Alkalinity as HCO3	mg/L																	320
Boron	mg/L	0.24	0.21	0.1 U	0.23	0.432	0.429	0.39	0.415	0.45	0.47 B	0.48	0.49 JB	0.5 JB	0.45	0.45	0.48	
Bromide	mg/L		0.3 J					7.81	8.8	8.9 J	8.9 J	10	8.7 J	8.8 J				
Cadmium	mg/L		0.00034 J			4E-05 U	1E-05 J	4E-05 U	4E-05 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U				
Calcium	mg/L	62	74	220	27	20.3	22.2	14.1	16.8	17 B	16	20	17	17				17
Carbonate Alkalinity as CaCO3	mg/L			120	5.6										5 U	5 U	5 U	
Chloride	mg/L	26	28	190	1900	2180	2310	1770	199	2200	2200	2100	2200	2200	1800	2200	2100	
Chromium	mg/L		0.24			0.0022	0.0049	0.00586	0.00582	0.0098	0.002 U	0.04	0.011	0.011				
Cobalt	mg/L		0.088			0.00062	0.00129	0.00235	0.00195	0.0012	0.00027 J	0.0099	0.0033	0.0031				
Conductivity, Field	uS/cm	1675	1977	8754	7203	6544	7642	5904	7014						6107			
Copper	mg/L		0.11							0.0028 B	0.002 U	0.0051 B	0.002 U	0.002 U				
Dissolved Oxygen, Field	mg/L					1.22	0.51	0.91	1.18						0.2			
Dissolved Solids, Total	mg/L	980	1100	1900	2900	3630	3980	3420	3600	3900 J	3700 J	3600	3400 J	3600 J	3300	3100	3100	
Fluoride	mg/L	0.67	0.5 U	0.86	1.5	2.17	2.05	1.97	2.18	2.4	2.2	2.3	2.3	2.3	2.6	2.7	2.2	
Iron	mg/L		120							1.7 JB	0.082 J	1	0.42	0.41				
Lead	mg/L		0.06			0.000244	0.00093	0.000135	0.000189	0.001 J	0.001 U	0.00046 J	0.001 U	0.001 U				
Lithium	mg/L		0.074			0.048	0.058	0.046	0.04	0.044	0.047	0.043	0.048	0.048				
Magnesium	mg/L	15	32	1 U	7.7			4.4	5.37	6.2 B	5.6	6.1	6.2	6.2	4.1	5.4	5.9	
Manganese	mg/L		1.7							0.046	0.032	0.055	0.045	0.044				
Mercury	mg/L					5E-06 U	3E-06 J	5E-06 U	5E-06 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U				
Molybdenum	mg/L		0.14			0.087	0.0889	0.125	0.106	0.11	0.11	0.11 J	0.097	0.098				
Nickel	mg/L		0.13							0.0065	0.002 U	0.038	0.0096	0.0087				
pH, Field	pH units	7.2	7.68	12.62	8.46	7.97	7.85	7.78	7.87	7.82	7.86	7.77	7.71	7.93	7.89			
Potassium	mg/L	3.7	12	33	3.8			3.87	4.57	3.1 B	2.6	2.7	2.7	2.7	2.1	2.6	2.6	
Radium-226	pCi/L					0.637	0.909	0.863	0.544	0.538	0.565	0.736	0.691 J	0.758 J				
Radium-226/228	pCi/L					2.587	1.969	1.538	1.252	0.869	1.14	1.19	1.32	1.41				
Radium-228	pCi/L					1.95	1.06	0.675	0.708	0.332 U	0.58	0.458	0.63	0.648				
Redox Potential, Field	mV					-98.5	788	35.3	-138.6									
Selenium	mg/L		0.0043 J			0.0001 J	0.0002 J	0.0003	0.0002 J	0.0007 J	0.005 U	0.005 U	0.005 U	0.005 U				
Silver	mg/L		0.0007 J							0.001 U	0.001 U	0.00036 J	6.9E-05 J	6.3E-05 J				
Sodium	mg/L	370	300	560	1500			1270	1050	1400 JB	1500	1500	1500 JB	1500 JB	1200	1400	1500	
Strontium	mg/L		0.96					1.18	1.4	1.7 B	1.9	1.7 B	1.7	1.7				
Sulfate	mg/L	470	460	3.1 J	750	11.4	8.4	12.2	9.9	15 J	13 J	15	14 J	14 J				
Temperature, Field	deg C	18	16	13	14	19.02	18.6	14.9	14.1						15.2			
Thallium	mg/L		0.0006 J															
Turbidity, Field	NTU	46	854	19.8	13.4	7	42.7	7.4	15.3	31.1	6.4	2.8		6	4.6	1.18		
Vanadium	mg/L												0.005 U	0.005 U				
Zinc	mg/L		0.4							0.02 U	0.02 U	0.02 U	0.02 U	0.02 U				

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Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Analyte	Unit	Program	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL
		Location ID	93100	93100	93100	93100	93100	93108	93108	93108	93108	93108	93108	93108	93108	93108	93108
Sample Type	Date	2019-03-11	2019-09-23	2020-03-19	2020-03-19	2020-09-22	2016-08-24	2016-10-06	2016-12-02	2017-02-02	2017-03-23	2017-05-02	2017-06-12	2017-07-18	2018-03-15	2018-09-14	2016-08-24
		N	N	FD	N	N	N	N	N	N	N	N	N	N	N	N	N
Alkalinity, Total as CaCO3	mg/L	320	330	330	330	320			720	672						640	640
Aluminum	mg/L										2.5 J	0.13	0.041 JB	7.1			
Antimony	mg/L						0.0001	3E-05 J	0.00023	0.00016	0.002 U	0.002 U	0.002 U	0.002 U			2E-05 J
Arsenic	mg/L						0.00196	0.00153	0.0025	0.00166	0.0018 J	0.0013 J	0.0016 J	0.0029 J			0.00037
Barium	mg/L						0.174	0.164	0.199	0.157	0.19 B	0.18	0.18	0.22			0.0865
Beryllium	mg/L						4.1E-05	1E-05 J	0.000162	0.000107	0.001 U	0.001 U	0.001 U	0.00047 J			2E-05 U
Bicarbonate Alkalinity as CaCO3	mg/L		330	330	330	320										640	640
Bicarbonate Alkalinity as HCO3	mg/L	320															
Boron	mg/L	0.49	0.46	0.47	0.47	0.48	0.429	0.404	0.391	0.411	0.5	0.48	0.46	0.48 JB	0.45	0.47	0.405
Bromide	mg/L								2.42	2.16	2.4 J	2.7 J	2.8	2.6 J			
Cadmium	mg/L						7E-05	3E-05	0.0003	0.00019	0.001 U	0.001 U	0.0014	0.00024 J			6E-06 J
Calcium	mg/L	17	18	17	18	19	6.09	5.87	6.55	5.85	6 B	5.9	5.8	6.4	5.6	6.4	23.2
Carbonate Alkalinity as CaCO3	mg/L	5 U	5 U	4.6 J	5 U	5 U									5 U	5 U	
Chloride	mg/L	2100	2000	2200	2200	2200	745	731	681	688	700	820	790	750	770	720	888
Chromium	mg/L						0.0086	0.0062	0.0263	0.025	0.02	0.004	0.002 U	0.067			0.0012
Cobalt	mg/L						0.00113	0.00039	0.00393	0.00262	0.002	0.00037 J	0.00025 J	0.0059			0.000107
Conductivity, Field	uS/cm			6772	6772	6702	3490	3589	3580	3545		0.008 B	0.002 U	0.002 U	0.021	3606	3541
Copper	mg/L																
Dissolved Oxygen, Field	mg/L						1.67	0.81	1.01	1.42					0.64		1.08
Dissolved Solids, Total	mg/L	3100	2900	3200	3900	3100	1940	1900	1950	1900	1800 J	1900 J	2000	1800 J	2100	1700	1850
Fluoride	mg/L	2.2	2.7	2.6	2.6	2.3	4.59	4.46	4.15	4.57	5.4	5.1	5.3	5.5	4.6	4.9	0.96
Iron	mg/L										2.7 JB	0.25	0.12	8.3			
Lead	mg/L						0.00206	0.000516	0.00639	0.00385	0.0026 J	0.0007 J	0.001 U	0.0074			5.3E-05
Lithium	mg/L						0.027	0.028	0.033	0.024	0.025	0.025	0.029	0.033			0.028
Magnesium	mg/L	6.1	6.3	5.3	5.6	5.8			2.33	2.18	2.2 B	2	1.8	2.9	1.7	1.9 J	
Manganese	mg/L										0.051	0.027	0.031	0.092			
Mercury	mg/L						5E-06	1.5E-05	1E-05	9E-06	0.0002 U	0.0002 U	0.0002 U	0.0002 U			5E-06 U
Molybdenum	mg/L						0.254	0.267	0.237	0.23	0.25	0.24	0.23 J	0.24			0.0135
Nickel	mg/L										0.014	0.0033	0.0015 J	0.05			
pH, Field	pH units	8.06	8.04	8.02	8.02	7.94	7.59	7.87	7.96	7.9	8.07	7.99	7.87	7.84	7.97	7.7	7.54
Potassium	mg/L	2.6	2.9	2.5	2.5	2.6			2.59	2.53	1.8 B	1.4	1.3	2.7	1.3	1.4 J	
Radium-226	pCi/L						0.74	0.639	1.02	0.322	0.355	0.289	0.351	0.527			0.312
Radium-226/228	pCi/L						2.68	2.059	1.229	0.502	0.471	0.919	0.704	2.09			2.592
Radium-228	pCi/L						1.94	1.42	0.209	0.18	0.116 U	0.63	0.353	1.56			2.28
Redox Potential, Field	mV						-29.9	-145.3	-112.7	-121.3							170.7
Selenium	mg/L						0.0002 J	6E-05 J	0.0004	0.0002	0.005 U	0.005 U	0.005 U	0.005 U			4E-05 J
Silver	mg/L										0.001 U	0.001 U	0.001 U	6.2E-05 J			
Sodium	mg/L	1500	1400	1400	1400	1400			827	595	790 JB	790 B	790	760 JB	810	820	
Strontium	mg/L								0.434	0.41	0.46 B	0.5 B	0.45 B	0.46			
Sulfate	mg/L	18 J	16	17	17	13	73.1	66.1	68.1	72.3	83 J	82	84	90	85	85	91.6
Temperature, Field	deg C			16	16	17	18.33	15	12.9	12.9					14.8		17.44
Thallium	mg/L						0.000125	4E-05 J	0.000159	0.000126	0.001 U	0.001 U	0.001 U	0.00021 J			1E-05 J
Turbidity, Field	NTU		7	4	4	1.4	28.9	9.7	18.3	15.9	50.1	16.4	8.6	287.1	4.8	10.1	4
Vanadium	mg/L										0.0045 J			0.013			
Zinc	mg/L										0.019 J	0.02 U	0.02 U	0.036			

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		Location ID	94136	94136	94136	94136	94136	94136	94136	94136	94136	94136	94136	94136	94136	94136	94136	94136
Sample Type	Date	2016-10-06	2016-12-01	2017-02-01	2017-03-23	2017-04-28	2017-06-09	2017-07-17	2017-07-17	2018-03-08	2018-03-08	2018-09-12	2019-03-07	2019-09-17	2019-09-17	2020-03-25	2020-09-25	
		N	N	N	N	N	N	FD	N	FD	N	N	N	FD	N	N	N	
Alkalinity, Total as CaCO3	mg/L		331	323								310	310	330	340	370	340	
Aluminum	mg/L				0.057	0.037 J	0.69	0.05 U	0.05 U									
Antimony	mg/L	3E-05 J	2E-05	1E-05 J	0.0017 J	0.002 U	0.01 U	0.002 U	0.002 U									
Arsenic	mg/L	0.00048	0.00042	0.00039	0.0012 J	0.005 U	0.025 U	0.005 U	0.005 U									
Barium	mg/L	0.0894	0.102	0.0877	0.11 B	0.1	0.099 B	0.11	0.1									
Beryllium	mg/L	1E-05 J	1E-05	5E-06 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U									
Bicarbonate Alkalinity as CaCO3	mg/L											310		330	330	360	340	
Bicarbonate Alkalinity as HCO3	mg/L												310					
Boron	mg/L	0.395	0.349	0.362	0.46	0.43 B	0.54	0.42 JB	0.44 JB	0.49	0.54		0.33	0.41	0.44	0.48	0.41	
Bromide	mg/L		4.07	3.25	3.7 J	3.7 J	3.8 J	4.2 J	4.2 J									
Cadmium	mg/L	6E-06 J	6E-06	5E-06 J	0.001 U	0.001 U	0.005 U	0.001 U	0.001 U									
Calcium	mg/L	22	19.2	17.7	19 B	17	16	17	17	29	34							
Carbonate Alkalinity as CaCO3	mg/L											5 U	5 U	5.9	6	6.1	5.1	
Chloride	mg/L	927	887	882	910	900	940	950	960	940	950	970	900	870	870	960	830	
Chromium	mg/L	0.002	0.0013	0.00124	0.0019 J	0.002 U	0.005 J	0.0032	0.001 J									
Cobalt	mg/L	0.00029	0.00015	0.000122	0.0004 J	0.00079 J	0.0014 J	0.0007 J	0.00065 J									
Conductivity, Field	uS/cm	3581	3578	3558								3896				3409	3397	
Copper	mg/L				0.00085 JB	0.002 U	0.01 U	0.002 U	0.002 U									
Dissolved Oxygen, Field	mg/L	0.58	0.77	1.7								4.05						
Dissolved Solids, Total	mg/L	1820	1840	1750	1800 J	2000 J	2000	1800 J	1900 J	1900	1900		1700	2000	1900	1700	1400	
Fluoride	mg/L	0.94	1.03	0.9	1.2	1.2	1.4	1.1	1.1	1.1	1.1	1.2	1.1	1.3	1.4	1.4	1.4	
Iron	mg/L				0.067 JB	0.1 U	0.6	0.1 U	0.1 U									
Lead	mg/L	0.000164	0.000142	7.9E-05	0.00031 J	0.001 U	0.001 U	0.001 U	0.001 U									
Lithium	mg/L	0.033	0.035	0.029	0.026	0.028	0.025	0.03	0.029									
Magnesium	mg/L		4.46	4.13	4.5 B	3.9	4.1 J	4.3	4.3	6.5	7.4	3.9	3.8	3.5	3.5	3.5	3.6	
Manganese	mg/L				0.058	0.03	0.079	0.098	0.089									
Mercury	mg/L	5E-06 U	2E-06	5E-06 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U									
Molybdenum	mg/L	0.015	0.0137	0.0133	0.02	0.015	0.017 J	0.015	0.015									
Nickel	mg/L				0.0015 J	0.004	0.01 U	0.002 U	0.002 U									
pH, Field	pH units	7.69	7.72	7.74	7.81	7.76	7.8	7.89	7.89			7.74	7.87	8		8.02	8.06	8.07
Potassium	mg/L		2.38	4.27	2.1 B	2	2.1 J	2	2	2.4	2.6	2.1	1.8	1.9	1.9	1.9	1.9	
Radium-226	pCi/L	0.984	0.122	0.304	0.211	0.338	0.191	0.123	0.22									
Radium-226/228	pCi/L	2.264	1.642	0.665	0.398	0.584	0.528	0.521	0.765									
Radium-228	pCi/L	1.28	1.52	0.361	0.188 U	0.246 U	0.337 U	0.398	0.545									
Redox Potential, Field	mV	11.5	-50.1	26.4														
Selenium	mg/L	8E-05 J	7E-05	5E-05 J	0.0012 J	0.005 U	0.025 U	0.005 U	0.005 U									
Silver	mg/L				0.001 U	0.001 U	0.005 U	0.001 U	0.001 U									
Sodium	mg/L		557	496	750 JB	690	750	720 JB	720 JB	790	800	760	710	750	760	690	690	
Strontium	mg/L		0.686	0.616	0.74 B	0.69	0.65 B	0.73	0.73									
Sulfate	mg/L	75.1	63.8	52.7	78 J	83	99	60	61	150	180	75	60	81	85	73	67	
Temperature, Field	deg C	15.8	15.3	14							14.7					15	16	
Thallium	mg/L	9.9E-05	1E-05	5E-05 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U									
Turbidity, Field	NTU	8.4	9.2	21.1	6.4	195.4	8.5		5.9		1.1	2.94			12	7	2.9	
Vanadium	mg/L				0.00054 J			0.005 U	0.005 U									
Zinc	mg/L				0.02 U	0.02 U	0.1 U	0.02 U	0.02 U									

Notes:
FD = Field duplicate sample
N = Normal environmental sample
deg C = Degree Celsius
mg/L = Milligrams per liter
mV = Millivolts
NTU = Nephelometric Turbidity Unit
uS/cm = Microsiemens per centimeter
pCi/L = PicoCuries per liter
B: Compound was found in the blank and sample.
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Empty cells = Not analyzed

Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Analyte	Unit	Program	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL
		Location ID	94137	94137	94137	94137	94137	94137	94137	94137	94137	94137	94137	94137	94137	94137	94139
Sample Type	Date	2016-08-24	2016-10-06	2016-12-01	2017-02-01	2017-03-23	2017-04-28	2017-06-09	2017-07-17	2018-03-08	2018-09-12	2019-03-11	2019-09-17	2020-03-25	2020-09-25	2016-08-23	2016-10-05
Alkalinity, Total as CaCO3	mg/L			341	360						330	330	340	350	330		
Aluminum	mg/L					0.039 J	0.05 U	0.27	0.05 U								
Antimony	mg/L	5E-05	3E-05 J	3E-05	4E-05 J	0.00038 J	0.002 U	0.002 U	0.002 U							4E-05 J	3E-05 J
Arsenic	mg/L	0.00179	0.00244	0.00211	0.00138	0.0026 J	0.0012 J	0.0036 J	0.0028 J							0.00328	0.00322
Barium	mg/L	0.0524	0.0578	0.0553	0.049	0.068 B	0.056	0.065 B	0.059							0.0893	0.0852
Beryllium	mg/L	2E-05 U	2E-05 U	5E-06	2E-05 U	0.001 U	0.001 U	0.001 U	0.001 U							6.5E-05	2.7E-05
Bicarbonate Alkalinity as CaCO3	mg/L										330		340	350	330		
Bicarbonate Alkalinity as HCO3	mg/L										330		340	350	330		
Boron	mg/L	0.021	0.017	0.022	0.037	0.04 J	0.028 JB	0.039 J	0.072 JB	0.035 J^		0.037 J	0.1 U	0.1 U	0.024 J	0.498	0.507
Bromide	mg/L			0.106	0.085	0.11 J	2.5 U	0.11 J	0.09 J								
Cadmium	mg/L	6E-05	2E-05	7E-05	5E-05	0.001 U	0.001 U	0.001 U	0.001 U							1E-05 J	1E-05 J
Calcium	mg/L	147	163	154	148	160 B	160	160	160	150	160	150	150	150	150	6.7	5.6
Carbonate Alkalinity as CaCO3	mg/L										5 U	5 U	5 U	5 U	5 U		
Chloride	mg/L	27.5	27.7	27.8	27.5	29	29	29	28	28	28	28	26	27	28	487	503
Chromium	mg/L	0.0035	0.0055	0.0014	0.00169	0.0031	0.002 U	0.0049	0.0038							0.0008	0.0017
Cobalt	mg/L	0.0922	0.495	0.0503	0.056	0.12	0.031	0.097	0.17							0.000397	0.00031
Conductivity, Field	uS/cm	1252	1305	1283	1302					1281				1221	1213	2454	2630
Copper	mg/L					0.00065 JB	0.002 U	0.0045	0.002 U								
Dissolved Oxygen, Field	mg/L	1.08	0.73	0.83	1.29					1.61						1.05	0.41
Dissolved Solids, Total	mg/L	958	856	867	883	890 J	920 J	880	920 J	890		870	890	870	830	1420	1460
Fluoride	mg/L	0.11	0.1 J	0.12	0.11	0.14	0.12 J	0.13 J	0.12	0.12 J	0.11	0.25 U	0.11	0.12	0.12	4.22	4.08
Iron	mg/L					0.67 JB	0.19	1.6	0.83								
Lead	mg/L	0.0002	0.000152	0.000156	7E-05	0.00019 J	0.001 U	0.00053 J	0.001 U							0.000963	0.00125
Lithium	mg/L	0.011	0.017	0.015	0.007	0.0078 J	0.0096	0.0088	0.0088							0.02	0.026
Magnesium	mg/L			47.9	47.4	51 B	47	50	48	51	49	51	48	47	49		
Manganese	mg/L					0.088	0.06	0.13	0.14								
Mercury	mg/L	8E-06	3E-06 J	5E-06	2E-06 J	0.0002 U	0.0002 U	0.0002 U	0.0002 U							5E-06 U	5E-06 U
Molybdenum	mg/L	0.00275	0.00353	0.00287	0.00633	0.0034 J	0.0027 J	0.0031 J	0.0026 J							0.2	0.231
Nickel	mg/L					0.0028	0.0019 J	0.0039	0.003								
pH, Field	pH units	7.11	6.93	6.98	7.02	7.03	6.96	7.05	6.96	6.98	7.01	7.13	7.13	7.14	7.2	8.19	8.18
Potassium	mg/L			1.82	2.18	1.7 B	1.7	1.8	1.7	1.7	1.9	2	1.8	1.6	1.7		
Radium-226	pCi/L	0.171	1.71	0.29	0.257	0.239	0.111	0.0957	0.0922							1.34	0.464
Radium-226/228	pCi/L	2.681	2.373	1.268	3.127	0.261 U	0.201 U	0.331 U	0.3 U							16.81	1.634
Radium-228	pCi/L	2.51	0.663	0.978	2.87	0.0221 U	0.0903 U	0.235 U	0.208 U							15.47	1.17
Redox Potential, Field	mV	-32.2	-21.4	-55.4	-74.7											-51.8	-191.2
Selenium	mg/L	5E-05 J	9E-05 J	5E-05	0.0001 U	0.00056 J	0.005 U	0.005 U	0.005 U							0.0002	0.0001
Silver	mg/L					6E-05 J	0.001 U	6.8E-05 J	0.001 U								
Sodium	mg/L			70.7	65	68 JB	64 B	68	68 JB	67	64	67	65	61	64		
Strontium	mg/L			0.298	0.276	0.32 B	0.29	0.28 B	0.29								
Sulfate	mg/L	348	330	349	332	360 J	360	360	370	360	370	370	350	390	330	56.1	49
Temperature, Field	deg C	19.28	17	15.7	14					14.7				14	17	20.42	17.9
Thallium	mg/L	4E-05 J	4E-05 J	4E-05	0.000166	0.001 U	0.001 U	0.001 U	0.001 U							5E-05 U	5E-05 U
Turbidity, Field	NTU	5.9	9.7	7.8	7.1	8	13.9	4.5	6.7	2.3	4.31		3	2.5	1.3	69.7	8.8
Vanadium	mg/L					0.00076 J			0.005 U								
Zinc	mg/L					0.02 U	0.02 U	0.02 U	0.02 U								

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Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Analyte	Unit	Program	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL
		Location ID	94139	94139	94139	94139	94139	94139	94139	94139	94139	94139	94139	94139	94139	94139	96152
Sample Type	Date	2016-12-02	2017-02-02	2017-03-29	2017-04-28	2017-06-12	2017-06-12	2017-07-18	2018-03-15	2018-09-24	2019-03-11	2019-09-23	2020-03-19	2020-09-22	2019-03-28	2019-09-22	2020-03-26
		N	N	N	N	FD	N	N	N	N	N	N	N	N	N	N	N
Alkalinity, Total as CaCO3	mg/L	563	555						510	500	500	490	520	500	450	450	470
Aluminum	mg/L			1.1 J	0.092	3.8 B	5.1 B	32									
Antimony	mg/L	6E-05	3E-05 J	0.0017 J	0.002 U	0.002 U	0.002 U	0.002 U									
Arsenic	mg/L	0.00438	0.00317	0.0031 J	0.0033 J	0.0047 J	0.0051	0.008									
Barium	mg/L	0.0969	0.081	0.097 B	0.092	0.11	0.12	0.29									
Beryllium	mg/L	7.1E-05	2E-05 J	0.001 U	0.001 U	0.001 U	0.00038 J	0.0015									
Bicarbonate Alkalinity as CaCO3	mg/L								490	490		470	490	470	450	450	470
Bicarbonate Alkalinity as HCO3	mg/L										480						
Boron	mg/L	0.458	0.456	0.52	0.54 B	0.53	0.54	0.54 JB	0.51	0.5	0.54	0.51	0.51	0.51	0.43	0.41	0.43
Bromide	mg/L	1.75	1.57	1.9 J	1.8 J	1.8 J	1.8 J	1.8 J									
Cadmium	mg/L	2E-05 U	6E-06 J	0.001 U	0.001 U	0.001 U	0.001 U	0.00034 J									
Calcium	mg/L	7.99	6.66	5.5 B	7.1	9.6	10	13	7.1	6.8	6.7	7.5	7.4	8.1	85	61	64
Carbonate Alkalinity as CaCO3	mg/L								15	13	17	19	27	24	5 U	5 U	5 U
Chloride	mg/L	450	500	510	510	480	480	520	500	560	500	480	560	560	4900	4300	4800
Chromium	mg/L	0.00236	0.000647	0.0017 J	0.002 U	0.0029	0.0052	0.014									
Cobalt	mg/L	0.000507	0.000159	0.00037 J	0.001 U	0.00062 J	0.00082 J	0.0035									
Conductivity, Field	uS/cm	2608	2726						2550					2467	2493		12690
Copper	mg/L			0.0014 JB	0.002 U	0.007 B	0.0063 B	0.019									
Dissolved Oxygen, Field	mg/L	0.79	1.27						1.29								
Dissolved Solids, Total	mg/L	1390	1360	1500 J	1500 J	1400	1400	1400 J	1400	1400	1300	1300	1300	1400	6400	6200	6600
Fluoride	mg/L	4.05	4.11	4.6	4.7	5	5	5.1	4.4	4.6	4.4	4.7	4.6	4.6	0.84	0.91	0.86
Iron	mg/L			0.62 JB	0.048 J	1.7	2.4	16									
Lead	mg/L	0.000921	0.000319	0.001 J	0.001 U	0.0025	0.004	0.029									
Lithium	mg/L	0.026	0.014	0.019	0.019	0.018	0.019	0.024									
Magnesium	mg/L	2.44	2	1.9 B	2.1	3.2	3.4	7.5	2.3	2.1	2.3	2.9	2.3	2.9	28	24	23
Manganese	mg/L			0.026	0.017	0.023	0.033	0.28									
Mercury	mg/L	1E-05	3E-06 J	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ	0.0002 U									
Molybdenum	mg/L	0.214	0.195	0.22	0.21	0.19 J	0.2 J	0.19									
Nickel	mg/L			0.00089 J	0.002 U	0.0025	0.0027	0.013									
pH, Field	pH units	8.17	8.13	8.12	8.14		8.01	7.92	8.19	8.17	8.37	8.36	8.35	8.22	7.71	7.55	7.75
Potassium	mg/L	2.6	1.97	1.4 B	1.4	1.5	1.6	2.4	1.4	1.4	1.4	1.6	1.3	1.5	14	11	11
Radium-226	pCi/L	0.936	0.454	0.387	0.547	0.559	0.61	0.886 J									
Radium-226/228	pCi/L	1.606	1.196	0.797	0.907	1.12	0.971	2.21									
Radium-228	pCi/L	0.67	0.742	0.41 U	0.36 U	0.565	0.361 U	1.32									
Redox Potential, Field	mV	-43.3	-102.6														
Selenium	mg/L	0.0002	3E-05 J	0.00089 J	0.005 U	0.005 U	0.00091 J	0.0029 J									
Silver	mg/L			0.001 U	0.001 U	0.001 U	0.001 U	0.0019 J									
Sodium	mg/L	425	451	580 JB	570	530	550	560 JB	550	590	560	510	550	520	2800	2500	2500
Strontium	mg/L	0.453	0.395	0.4 B	0.46	0.48 B	0.51 B	0.75									
Sulfate	mg/L	52.8	51	62 J	62	70	69	66	65	74	66	60	62	59	19	16	20
Temperature, Field	deg C	14.8	14.3						15.7				16	17			15
Thallium	mg/L	2E-05 J	2E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U									
Turbidity, Field	NTU	169.8	8.7	5	5.9		90.8	69.3	22	10.8		34	7.4	309		252	230
Vanadium	mg/L							0.0079									
Zinc	mg/L			0.02 U	0.02 U	0.02 U	0.02 U	0.081									

Notes:
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Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Analyte	Unit	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL		
		96152 2020-09-17 N	96153R 2016-08-23 N	96153R 2016-10-03 N	96153R 2016-11-29 N	96153R 2017-03-21 N	96153R 2017-04-25 N	96153R 2017-06-06 N	96153R 2017-07-12 N	96153R 2018-03-22 N	96153R 2018-03-22 N	96153R 2018-09-13 N	96153R 2019-03-29 N	96153R 2019-09-19 N	96153R 2020-03-15 N	96153R 2020-03-24 N	96153R 2020-09-15 N	96154R 2016-08-23 N
Alkalinity, Total as CaCO3	mg/L	550			262	84						71	140	5 U	280	270	230	
Aluminum	mg/L						0.56	0.47	0.085 B									
Antimony	mg/L		0.00059	0.00036	0.00024	0.00085 J	0.002 U	0.00057 J	0.002 U		0.002 U							0.00091
Arsenic	mg/L		0.00237	0.00142	0.0013	0.0044 J	0.005 U	0.005 U	0.005 U		0.005 U							0.00644
Barium	mg/L		0.0315	0.0901	0.136	0.061 JB	0.027	0.037	0.03		0.028							0.13
Beryllium	mg/L		0.000515	0.000196	0.00019	0.012	0.0048	0.00038 J	0.001 U		0.0052							0.000546
Bicarbonate Alkalinity as CaCO3	mg/L	550									71	140	5 U	280	270	230		
Bicarbonate Alkalinity as HCO3	mg/L																	
Boron	mg/L	0.43	0.448	0.423	0.463	0.23	0.25	0.48 B	0.48 B		0.32	0.39	0.18	0.54	0.51	0.5	0.441	
Bromide	mg/L				0.2 U	5 U	5 U	5 U	5 U									
Cadmium	mg/L		8E-05	0.0001	2E-05 J	0.00036 J	0.00024 J	0.001 U	0.001 U		0.00027 J							5E-05
Calcium	mg/L	50	189	208	177	210 B	200	72	130		150	150	160	92	120	140	9.41	
Carbonate Alkalinity as CaCO3	mg/L	5 U									5 U	5 U	5 U	5 U	5 U	5 U		
Chloride	mg/L	3400	34.3	16.1	11.6	16	20	35	19		19	21	20	31	14	15	413	
Chromium	mg/L		0.0034	0.0027	0.00261	0.0028 J	0.002 U	0.002 U	0.002 U		0.002 U							0.0022
Cobalt	mg/L		0.0234	0.0266	0.00693	0.3	0.29	0.012	0.0063		0.2							0.00204
Conductivity, Field	uS/cm	10609	3013	2934	2473					2256				2396	2274	2131	2462	
Copper	mg/L						0.002 U	0.002 U	0.0034									
Dissolved Oxygen, Field	mg/L		4.65	3.74	1.71					0.12								0.68
Dissolved Solids, Total	mg/L	4500	2300	2160	1700	1800	1900 J	1800	1600 J		1600	1500	1600	1500 J	1700	1500	1940	
Fluoride	mg/L	0.97	0.8	0.72	0.67	2.3	2.3	1.4	1.2		1.4	1.1	2.6	1.2	1	0.81	3.32	
Iron	mg/L						30	0.94	0.14									
Lead	mg/L		0.00648	0.00278	0.00277	0.0014 J	0.001 U	0.00045 J	0.001 U		0.001 U							0.00565
Lithium	mg/L		0.096	0.081	0.053	0.18	0.2	0.069	0.054		0.16							0.08
Magnesium	mg/L	17			33.6		73	17	26			53	69	19	23	28		
Manganese	mg/L					18 B	17	1.6	0.99									
Mercury	mg/L		8E-06	2E-06 J	1.5E-05	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U							2.5E-05
Molybdenum	mg/L		0.0126	0.0114	0.00812	0.0065 J	0.0042 J	0.02	0.0068 J		0.003 J							0.0557
Nickel	mg/L					0.27	0.018	0.0061										
pH, Field	pH units	7.68	7.18	6.99	7.35	6.46	6.19	7.2	7.49	7.14	6.04	6.59	5.31	7.42	7.36	7.23	9.5	
Potassium	mg/L	9.3			6.7	10 JB	11	5.3	5.8			15	11	5.5	5.8	6		
Radium-226	pCi/L		0.634	0.403	0.968	0.476	0.475	0.335	0.05 U		0.328							1.21
Radium-226/228	pCi/L		2.434	1.963	1.64	0.764	0.926	0.607	0.702		0.72							1.566
Radium-228	pCi/L		1.8	1.56	0.672	0.288 U	0.451	0.272 U	0.652 J		0.393 U							0.356
Redox Potential, Field	mV		36.1	136.7	227.2													97.1
Selenium	mg/L		0.0009	0.0005	0.0006	0.0053 J	0.0017 J	0.0014 J	0.001 JB		0.005 U							0.001
Silver	mg/L						0.001 U	0.001 U	0.001 U									
Sodium	mg/L	2100			287	160 JB	190	490 B	330			280	150	420	350	330		
Strontium	mg/L				3.22	1.5 JB	1.4	1.3 B	2.6									
Sulfate	mg/L	28	1290	1320	973	1200	1700	1000	1000		1100	1100	1100	1200	1100	910	99.2	
Temperature, Field	deg C	14	14.3	14.6	13.3					12.2				13	13	14	16.5	
Thallium	mg/L		5E-05 J	8E-05 J	2E-05 J	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U							6.4E-05
Turbidity, Field	NTU	76.1	141.2	65	49.6	113.6	87.4	19.2	30.7	7	69.4		85	4	10.5	9.8	737	
Vanadium	mg/L																	
Zinc	mg/L						0.61	0.018 J	0.02 U									

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Gavin Power Plant

Analyte	Unit	Program	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL
		Location ID	96154R	96154R	96154R	96154R	96154R	96154R	96154R	96154R	96154R	96154R	96154R	96154R	96154R	96154R	96156
Sample Type	Date	2016-10-03	2016-11-29	2017-01-30	2017-03-21	2017-04-25	2017-06-06	2017-07-12	2018-03-22	2018-09-13	2019-03-29	2019-03-29	2019-09-19	2020-03-12	2020-09-14	2016-08-23	2016-10-03
Alkalinity, Total as CaCO3	mg/L		558	607	600						460	350	350	280	560	530	
Aluminum	mg/L					0.42	1.4	0.96 B									
Antimony	mg/L	0.00098	0.00046	0.00078	0.0014 J	0.0014 J	0.002 U	0.0006 JB								0.0001 J	0.00141
Arsenic	mg/L	0.00668	0.00409	0.00277	0.0049 J	0.0093	0.0022 J	0.0025 J								0.0141	0.0184
Barium	mg/L	0.115	0.219	0.194	0.28 JB	0.067	0.12	0.11								16.2	17.4
Beryllium	mg/L	0.000319	0.000679	0.000166	0.001 U	0.001 U	0.001 UJ	0.001 U								0.0002 U	0.000129
Bicarbonate Alkalinity as CaCO3	mg/L								110	5 U	5 U	5 U	280	470			
Bicarbonate Alkalinity as HCO3	mg/L																
Boron	mg/L	0.395	0.504	0.454	0.49	0.5	0.53 B	0.53 B			0.38	0.38	0.39	0.43	0.45	0.394	0.357
Bromide	mg/L		1.48	1.36	1.5 J	1.4 J	2.4	1.8 J									
Cadmium	mg/L	2E-05	4E-05	4E-05	0.001 U	0.001 U	0.001 U	0.001 U								0.00022	0.00221
Calcium	mg/L	5.34	10.5	22.1	31 B	2.1	4.8	4.3			3.2	61	61	26	17	7	409
Carbonate Alkalinity as CaCO3	mg/L								350	130	130	130	180	280	58		
Chloride	mg/L	452	410	446	410	410	470	490	410	340	330	350	490	470	11700		
Chromium	mg/L	0.0057	0.0121	0.00249	0.0051 J	0.002 U	0.0078 J	0.0013 J								0.0011	0.0195
Cobalt	mg/L	0.00176	0.00443	0.000799	0.00095 J	0.00037 J	0.00042 J	0.00022 J								0.00194	0.00371
Conductivity, Field	uS/cm	2602	2562	2549					2650					2483	2545	30150	32283
Copper	mg/L					0.002 U	0.0043 B	0.002 U									
Dissolved Oxygen, Field	mg/L	0.59	1.16	1.02					0.15							2.61	2.64
Dissolved Solids, Total	mg/L	1550	1850	1590	1400	1400 J	1500	1500 J			860	850	900	1400	1400	18300	
Fluoride	mg/L	3.36	3.4	3.33	4.2	4.5	4.1	4.5	4.4	3.3	3.3	3.9	4	4.2	0.33		
Iron	mg/L					0.29	1.4	0.64									
Lead	mg/L	0.00371	0.00967	0.0031	0.0021 J	0.001 U	0.00077 J	0.00048 J								0.00236	0.0218
Lithium	mg/L	0.054	0.04	0.137	0.24	0.19	0.048	0.049								0.269	0.252
Magnesium	mg/L		4.24	1.48		0.55 J	1.5	1.4	0.51 J	0.34 J	0.41 J	0.24 J	1.5	1.3			
Manganese	mg/L				0.02 B	0.011	0.013	0.0053									
Mercury	mg/L	1E-05	3E-05	1.8E-05	0.0002 U	0.0002 U	0.0002 U	0.0002 U								5E-06 U	0.0002 U
Molybdenum	mg/L	0.102	0.0724	0.0692	0.09 J	0.093	0.1	0.1								0.00987	0.017
Nickel	mg/L					0.002 U	0.0028	0.002 U									
pH, Field	pH units	9.36	8.67	9.64	10.67	10.32	8.76	8.82	9.85	10.11		12.06	11.7	9.76	8.93	7.07	6.83
Potassium	mg/L		7.64	33.8	58 JB	41	6	6.1		12	20	20	10	7.2	3.6		
Radium-226	pCi/L	0.53	1.68	0.96	0.696	0.664	0.251	0.213								33.8	
Radium-226/228	pCi/L	1.434	2.328	1.762	1.21	0.894	0.655	0.577								75.85	41.96
Radium-228	pCi/L	0.904	0.648	0.802	0.51	0.23 U	0.405	0.364 UJ								42.05	41.96
Redox Potential, Field	mV	54.8	175.9	139.8												-82.4	-66.3
Selenium	mg/L	0.001	0.002	0.0006	0.00096 J	0.005 U	0.005 U	0.005 U								0.0006 J	0.0004 J
Silver	mg/L					0.001 U	0.0017	0.00021 J									
Sodium	mg/L		478	449	540 JB	510	540 B	590		450	340	340	320	520	500		
Strontium	mg/L		0.425	1.37	2.6 JB	0.57	0.36 B	0.38									
Sulfate	mg/L	87.4	125	66.8	64	60	100	100		42	29	29	33	33	36	1.9	
Temperature, Field	deg C	14.4	13.3	11.2					12.6					13	14	15.2	16.1
Thallium	mg/L	0.000144	0.000121	0.000114	0.001 U	0.001 U	0.001 U	0.001 U								0.0005 U	0.0002 J
Turbidity, Field	NTU	209.7	642.7	349.1	98.6	63.9	44.8	16.2	6	6.23			41	140	87.9	9	38.2
Vanadium	mg/L																
Zinc	mg/L					0.02 U	0.02 U	0.02 U									

Notes:
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 N = Normal environmental sample
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 mg/L = Milligrams per liter
 mV = Millivolts
 NTU = Nephelometric Turbidity Unit
 uS/cm = Microsiemens per centimeter
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 B: Compound was found in the blank and sample.
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Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Program Location ID Date Sample Type	FEDERAL 96156 2016-11-29 N	FEDERAL 96156 2017-01-30 N	FEDERAL 96156 2017-03-21 N	FEDERAL 96156 2017-04-25 N	FEDERAL 96156 2017-06-06 N	FEDERAL 96156 2017-07-12 N	FEDERAL 96156 2018-03-26 N	FEDERAL 9801 2016-08-24 N	FEDERAL 9801 2016-10-06 N	FEDERAL 9801 2016-12-02 N	FEDERAL 9801 2017-02-01 N	FEDERAL 9801 2017-03-29 N	FEDERAL 9801 2017-06-09 FD	FEDERAL 9801 2017-06-09 N	FEDERAL 9801 2017-07-17 N	FEDERAL 9801 2018-03-16 N
Alkalinity, Total as CaCO3		165	150							141	160					130
Aluminum				0.05 U	0.079	0.084 B							0.25 U	1.3 U	1.3 U	0.1 U
Antimony	0.00208	0.00022	0.0025	0.002 U	0.0017 J	0.0012 JB		0.0005 U	0.0005 U	5E-05 U	0.0005 U	0.01 U	0.05 U	0.05 U	0.04 U	
Arsenic	0.0398	0.00202	0.0035 J	0.0042 J	0.0043 J	0.0036 J		0.00075	0.00109	0.00072	0.00056	0.025 U	0.13 U	0.13 U	0.01 U	
Barium	17.7	14.8	16 JB	16	16	15		5.16	4.84	4.63	4.33	5 B	4.7 B	5 B	5.3	
Beryllium	0.0003 J	2E-05 U	0.00043 J	0.001 U	0.001 UJ	0.001 U		0.0002 U	0.0002 U	2E-05 U	0.0002 U	0.005 U	0.001 U	0.001 U	0.002 U	
Bicarbonate Alkalinity as CaCO3																130
Bicarbonate Alkalinity as HCO3																
Boron	0.375	0.379	0.46	0.4	0.43 B	0.4 B		0.378	0.329	0.353	0.404	0.42	0.45	0.45	0.52 JB	0.44
Bromide		58.6	57	73	67	51				34.3	36.2	41	36 J	35 J	39 J	
Cadmium	0.00419	0.0001	0.00043 J	0.00027 J	0.00088 J	0.0015		0.0002 U	0.0002 U	2E-05 U	0.0002 U	0.005 U	0.025 U	0.025 U	0.002 U	
Calcium	399	346	380 B	380	390	370		202	198	184	180	180 B	170	190	200	220
Carbonate Alkalinity as CaCO3																5 U
Chloride		12000	13000	17000	12000	12000		7930	7950	7210	7330	8800	8300	8100	9000	8300
Chromium	0.0598	0.000629	0.0011 J	0.002 U	0.0077 J	0.016		0.0045	0.0024	0.00216	0.000768	0.0017 J	0.05 U	0.05 U	0.0025 J	
Cobalt	0.00517	0.00145	0.0021	0.0016	0.0015	0.0017		0.00173	0.00172	0.000975	0.000957	0.0014 J	0.025 U	0.025 U	0.0011 J	
Conductivity, Field	17682	30266		0.82	1.3 B	1.3	32509	2129	23618	23470	22980		0.01 U	0.05 U	0.05 U	0.004 U
Copper																
Dissolved Oxygen, Field	5.31	4.89					0.24	3.03	0.71	2.8	1.53					0.22
Dissolved Solids, Total		18100	15000	19000 J	21000	15000 J		12600	13000	12300	11300	13000 J	14000	14000	14000 J	13000
Fluoride		2 U	2.5 U	5 U	1.3 U	2.5 U		0.87	0.61	0.6 J	0.91	1 J	5 U	5 U	5 U	2.5 U
Iron				4.5	7.7	2.7						0.51 JB	2.5 U	2.5 U	0.43	
Lead	0.0455	0.00115	0.0022 J	0.001 U	0.0055	0.0033		0.0001 J	0.0001 J	0.000354	9E-05 J	0.005 U	0.005 U	0.005 U	0.002 U	
Lithium	0.296	0.294	0.22	0.25	0.25	0.23		0.141	0.142	0.16	0.159	0.12	0.13	0.12	0.15	
Magnesium	117	111		130	140	130				54.6	55.2	63 B	58	63	63	61
Manganese			0.93 B	0.75	0.79	0.74						0.57	0.44	0.47	0.51	
Mercury	2.1E-05	1.1E-05	0.0002 U	0.0002 U	0.0002 U	0.0002 U		5E-06 U	1.6E-05	1.6E-05	1E-05	0.0002 U	0.0002 U	0.0002 U	0.0002 U	
Molybdenum	0.0225	0.0054	0.0056 J	0.0073 J	0.017	0.0086 J		0.00533	0.00723	0.00651	0.0068	0.0042 J	0.05 U	0.05 U	0.004 J	
Nickel				0.0045	0.0049	0.055						0.01 U	0.05 U	0.05 U	0.0035 J	
pH, Field	7.23	6.77	8.93	8.32	7.26	8.04	7.4	6.95	7.16	6.92	7.03	7.2		7.21	7.16	7.32
Potassium	36.5	47.4	22 JB	22	22	21				14.4	18.6	9.6 B	8.3 J	9.3 J	9.5	9.2
Radium-226		51.2	94	86.5	64.4	59.3 J		3.39	6.84	3.47	4.19	4.48	4.49	3.83	4.35 J	
Radium-226/228		122.3	189	189	138	119 J		8.15	13.99	7.83	9.95	10.5	10.3	11.3	11 J	
Radium-228		71.1	95.2	103	73.4	60.2		4.76	7.15	4.36	5.76	5.98	5.8	7.43	6.64 J	
Redox Potential, Field	176.5	102.7						124.2	-91.8	85.3	-87.4					
Selenium	0.001 J	0.0001	0.0013 J	0.005 U	0.00091 J	0.0011 JB		0.001 U	0.001 U	0.001 U	0.001 U	0.025 U	0.13 U	0.13 U	0.01 U	
Silver				6.6E-05 J	0.001 U	8.9E-05 J						0.005 U	0.005 U	0.005 U	0.002 U	
Sodium	2620	1400	6800 JB	6100	1 U	6400				4310	1650	4400 JB	4200	4700	4600 JB	4700
Strontium	30.4	25.3	31 JB	33	31 B	27				16.4	15.6	19 B	13 B	13 B	20	
Sulfate		1 J	50 U	100 U	25 U	50 U		3.4	7.2	6.7	3.4	8.6 J	100 U	100 U	100 U	50 U
Temperature, Field	15.7	9.1					12.7	19.72	16.5	14.2	13.5					14.9
Thallium	0.0002 J	3E-05 J	0.001 U	0.001 U	0.001 U	0.001 U		0.0002 J	0.0001 J	0.000528	0.0005 U	0.005 U	0.005 U	0.005 U	0.002 U	
Turbidity, Field	123.8	64.8	81.7	72.5	83.2	48	1	4.7	9.7	3	3.9	7.7		3.2	3.5	1.5
Vanadium																0.01 U
Zinc				0.19	0.18	0.16							0.1 U	0.5 U	0.5 U	0.04 U

Notes:
 FD = Field duplicate sample
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 mg/L = Milligrams per liter
 mV = Millivolts
 NTU = Nephelometric Turbidity Unit
 uS/cm = Microsiemens per centimeter
 pCi/L = PicoCuries per liter
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Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Analyte	Unit	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL
		9801 2018-09-12 N	9801 2019-03-12 N	9801 2019-09-24 N	9801 2020-03-24 N	9802 2016-08-24 N	9802 2016-10-06 N	9802 2016-12-02 N	9802 2017-02-01 N	9802 2017-03-29 N	9802 2017-06-09 N	9802 2017-07-17 N	9802 2018-03-16 N	9802 2018-09-12 N	9802 2019-03-12 N	9802 2019-09-24 N
Alkalinity, Total as CaCO3	mg/L	130	140	130	140		796	645				610	570	590	590	610
Aluminum	mg/L								0.071 J	0.22	0.05 U					
Antimony	mg/L	0.002 U				3E-05 J	4E-05 J	2E-05 J	3E-05 J	0.00034 J	0.002 U	0.002 U				
Arsenic	mg/L	0.005 U				0.00091	0.00072	0.0012	0.00103	0.00094 J	0.00083 J	0.00089 J				
Barium	mg/L	4.8				0.0781	0.0711	0.0664	0.069	0.08 B	0.086 B	0.082				
Beryllium	mg/L	0.001 U				5E-06 J	2E-05 U	7E-06 J	6E-06 J	0.001 U	0.00035 J	0.001 U				
Bicarbonate Alkalinity as CaCO3	mg/L	130		130	140								610	570	590	610
Bicarbonate Alkalinity as HCO3	mg/L		140											590		
Boron	mg/L	0.44	0.44	0.42	0.38	0.172	0.157	0.178	0.242	0.18	0.19	0.27 JB	0.2		0.2	0.21
Bromide	mg/L							0.499	0.157	2.5 U	2.5 U	2.5 U				
Cadmium	mg/L	0.001 U				2E-05	1E-05 J	0.0001	5E-05	0.001 U	0.001 U	0.001 U				
Calcium	mg/L	200	180	250	180	29.3	28.7	24.5	28	29 B	31 J	30	30	36	31	26
Carbonate Alkalinity as CaCO3	mg/L	5 U	5 U	5 U	5 U								5 U	5 U	5 U	5 U
Chloride	mg/L	8400	150	9300	8900	36.1	35.2	39.1	38	39	38	40	39	35	39	38
Chromium	mg/L	0.0018 J				0.0013	0.0028	0.00206	0.000823	0.00081 J	0.0025	0.0011 J				
Cobalt	mg/L	0.0015				0.000954	0.00112	0.000847	0.00108	0.0011	0.00048 J	0.00041 J				
Conductivity, Field	uS/cm				21314	1311	1361	1354	1366				13.31			1265
Copper	mg/L									0.00056 JB	0.0017 JB	0.002 U				
Dissolved Oxygen, Field	mg/L					1.81	0.73	2.01	1.68				1.46			
Dissolved Solids, Total	mg/L	14000	11000 HT	14000	11000	766	784	796	810	820 J	830	810 J			780	740
Fluoride	mg/L	1	0.05 U	1.1	1.1	0.88	0.8	0.8	0.84	0.96	0.99	0.95	1	0.94	0.91	1
Iron	mg/L									0.18 JB	0.27	0.058 J				
Lead	mg/L	0.001 U				4.4E-05	3.1E-05	4.3E-05	6E-05	0.00026 J	0.001 U	0.001 U				
Lithium	mg/L	0.13				0.015	0.018	0.022	0.012	0.014	0.012	0.014				
Magnesium	mg/L		69	83 J	54			6.8	7.8	8.2 B	9	8.6	8.1	9.3	8.8	7.8
Manganese	mg/L									0.48	0.1	0.28				
Mercury	mg/L	0.0002 U				5E-06 U	5E-06 U	1.1E-05	5E-06 U	0.0002 U	0.0002 U	0.0002 U				
Molybdenum	mg/L	0.0039 J				0.0064	0.00563	0.00543	0.00525	0.0051 J	0.0046 J	0.0048 J				
Nickel	mg/L									0.00079 J	0.0018 J	0.0022				
pH, Field	pH units	7.34	7.51	7.49	7.4	6.94	7.25	7.3	7.19	7.24	7.2	7.11	7.31	7.59	7.51	7.43
Potassium	mg/L		9.1	12 J	8.7			1.66	2.05	1.5 B	1.5	1.6	1.5	1.9	1.7	1.6
Radium-226	pCi/L	5.31				0.443	0.327	0.603	0.245	0.173	0.181	0.188				
Radium-226/228	pCi/L	11.5				2.763	0.638	0.832	0.506	0.31 U	0.276 U	0.786				
Radium-228	pCi/L	6.16				2.32	0.311	0.229	0.261	0.136 U	0.0949 U	0.597				
Redox Potential, Field	mV					14.6	-32.9	9	-49.4							
Selenium	mg/L	0.005 U				5E-05 J	4E-05 J	3E-05 J	5E-05 J	0.005 U	0.005 U	0.0012 J				
Silver	mg/L									0.001 U	0.001 U	0.001 U				
Sodium	mg/L		4800	4400	4200			253	270	260 JB	270	290 JB	290	260	290	280
Strontium	mg/L							0.58	0.601	0.62 B	0.55 B	0.65				
Sulfate	mg/L	6.3 J	1 U	5.2 J	8.9 J	65.8	57.5	60.2	58.9	70 J	72	71	68	68	73	69
Temperature, Field	deg C				14	20.37	18.2	14.3	13.6				16.8			16
Thallium	mg/L	0.001 U				5.8E-05	8.4E-05	5.8E-05	5E-05 J	0.001 U	0.001 U	0.001 U				
Turbidity, Field	NTU	4.22		6	1.4	0.4	2.5	14.4	6.5	6.9	1.6	7.5	2.1	35.3		5
Vanadium	mg/L											0.005 U				0.8
Zinc	mg/L									0.02 U	0.02 U	0.02 U				

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Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Galvin Power Plant

Program Location ID Date Sample Type	FEDERAL 9802 2020-09-22 N	FEDERAL 9806 2016-12-02 N	FEDERAL 9806 2017-02-08 N	FEDERAL 9806 2017-03-27 N	FEDERAL 9806 2017-05-01 N	FEDERAL 9806 2017-06-27 N	FEDERAL 9806 2018-03-20 N	FEDERAL 9806 2018-09-11 N	FEDERAL 9806 2019-03-14 N	FEDERAL 9806 2019-09-26 N	FEDERAL 9806 2020-03-25 N	FEDERAL 9806 2020-09-17 N	FEDERAL 9910 2016-10-03 N	FEDERAL 9910 2018-09-25 N	FEDERAL 9910 2019-03-26 N	FEDERAL 9910 2019-09-22 N
Alkalinity, Total as CaCO3	590	350	346				330	330	390 B	320	370	350		830	860	850
Aluminum				2.4 J	2.8	0.057										
Antimony		0.00011	6E-05	0.0003 JB	0.00068 J	0.002 U		0.002 U	0.002 U							
Arsenic		0.00207	0.00113	0.0011 J	0.0015 J	0.001 J		0.005 U	0.005 U							
Barium		0.0676	0.05	0.057 B	0.058	0.041		0.031	0.033							
Beryllium		0.000269	0.000122	0.001 U	0.00038 J	0.001 U		0.00061 JF2F1	0.001 U							
Bicarbonate Alkalinity as CaCO3	590						300	310	390 B	300	370	340		830	840	840
Bicarbonate Alkalinity as HCO3																
Boron	0.24	0.256	25	0.31	0.32	0.35	0.29	0.27	0.23	0.3	0.22	0.21		0.52	0.52	0.49
Bromide		0.82	0.65	0.94 J	0.77 J	0.96			0.23 J							
Cadmium		0.00037	0.0001	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U							
Calcium	26	5.35	159	4 B	4.2	3.7	3.6	9.6	37	4.1	31	37		12	13	13
Carbonate Alkalinity as CaCO3	5 U						22	19	5 U	26	5 U	7.3		5 U	23	6.9
Chloride	47	187	191	200	200	200	210	94	38	190	53	51		840	880	800
Chromium		0.00653	0.00291	0.004 B	0.0054	0.002 U		0.002 U	0.0015 J							
Cobalt		0.00516	0.00231	0.0016	0.0017	0.001 U		0.001 U	0.00046 J							
Conductivity, Field	1284	1500	1574				1533				1666	1691	4918			
Copper				0.0031 B	0.0066 B	0.002 U										
Dissolved Oxygen, Field		1.44	1.25				1.78						1.58			
Dissolved Solids, Total	790	860	874	890 J	860 J	870	880	850	1000	1900	930	1100		2400	2900	2700
Fluoride	0.9	1.14	1.08	1.4	1.3	1.3	1.3	0.87	0.34	1.4	0.44	0.39		2	1.9	2
Iron				2 JB	2.2	0.058 J										
Lead		0.00481	0.00227	0.0018 J	0.0028	0.001 U		0.001 U	0.001 U							
Lithium		0.022	0.249	0.013	0.012	0.012		0.036 F2F1	0.045							
Magnesium	7	2.21	171	1.4 B	1.5	0.92 J	0.85 J			1.5	13	16		4	4.2	4.3
Manganese				0.034 B	0.03	0.02 B										
Mercury		0.000131	6E-06	0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U							
Molybdenum		0.011	0.0107	0.012	0.011	0.023		0.0061	0.0023 J							
Nickel				0.0037 B	0.0036	0.002 U										
pH, Field	7.32	8.61	8.49	8.59	8.4	8.4	8.64	8.5	7.74	8.73	7.86	8.2	7.58	7.64	7.76	7.8
Potassium	1.5	2.09	18.4	1.6 B	1.7	0.84 J	0.96 J			1.1	2.9	3.2		2.9	3.2	3
Radium-226		0.658	0.221	0.154	0.149	0.199		0.151	0.0571 U							
Radium-226/228		0.7334	0.711	0.378	0.235 U	0.353		0.257 U	0.0148 U							
Radium-228		0.0754	0.49	0.224 U	0.0855 U	0.154 U		0.106 U	-0.0422 U							
Redox Potential, Field		-14.2	69.1										208.7			
Selenium		0.0007	0.0003	0.005 U	0.0011 J	0.005 U		0.0015 J	0.00098 J							
Silver				0.00084 J	0.0012	0.001 U										
Sodium	290	277	213	320 JB	350 B	350	320			320	310	350		1100	1100	1000
Strontium		0.166	1.28	0.15 B	0.16 B	0.13										
Sulfate	73	116	113	130 J	130	130	130	240	450	130	510	490		110	120	100
Temperature, Field	17	11	12.4				11.8				13	14	16.7			
Thallium		7E-05	4E-05 J	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U							
Turbidity, Field	1	301.9	74.3	110.6	40.6	53.8	13	4.33		32	2.3	0.8	184.3	46.5		69
Vanadium																
Zinc				0.0093 J	0.02 U	0.02 U										

Notes:
 FD = Field duplicate sample
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Appendix A
Analytical Data Summary
Residual Waste Landfill and Fly Ash Reservoir
Gavin Power Plant

Analyte	Unit	Program	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL	FEDERAL
		Location ID	9910	9910	MW-17	MW-20	MW-20	MW-20	MW-20	MW-20	MW-20	MW-20	MW-20	MW-20	MW-20
Date	Sample Type	2020-03-15	2020-09-17	2020-09-11	2016-08-23	2016-10-05	2016-12-01	2017-04-25	2017-06-06	2017-07-14	2018-03-26	2019-09-19	2020-03-15	2020-03-24	2020-09-15
Alkalinity, Total as CaCO3	mg/L	870	840	270			259					150	170	170	160
Aluminum	mg/L							0.05 U	0.043 J	0.15					
Antimony	mg/L				4E-05 J	0.0002 U	0.0001 U	0.002 U	0.002 U	0.002 U					
Arsenic	mg/L				0.00938	0.01	0.00917	0.0048 J	0.0086	0.013					
Barium	mg/L				0.0274	0.0228	0.0233	0.025	0.027	0.029					
Beryllium	mg/L				0.000234	0.000265	0.000276	0.00032 J	0.00055 J	0.00088 J					
Bicarbonate Alkalinity as CaCO3	mg/L	850	840	270								150	170	170	160
Bicarbonate Alkalinity as HCO3	mg/L														
Boron	mg/L	0.51	0.51	0.39	0.126	0.272	0.104	0.15 J	0.19 B	0.15		0.12	0.19 U	0.16	0.1
Bromide	mg/L						0.422	5 U	0.5 U	5 U					
Cadmium	mg/L				8E-05	2E-05 J	4E-05 U	0.001 U	0.001 U	0.001 U					
Calcium	mg/L	11	14	94	495	483	465	500	500	500		470	470	470	450
Carbonate Alkalinity as CaCO3	mg/L	19	5 U	5 U								5 U	5 U	5 U	5 U
Chloride	mg/L	850	850	4500	60.1	25.2	16.4	11	6.5	8.2 J		1.9	2	2.1	1.8
Chromium	mg/L				0.0028	0.0018	0.00121	0.002 U	0.0018 J	0.0025					
Cobalt	mg/L				0.128	0.134	0.143	0.13	0.13	0.14					
Conductivity, Field	uS/cm	4626	4577	12829	2819	3042	2935				2817		2523	2455	2402
Copper	mg/L							0.002 U	0.002 U	0.002 U					
Dissolved Oxygen, Field	mg/L				2.93	1.5	4.67				1.76				
Dissolved Solids, Total	mg/L	2900	2300	7500	2660	2710	2620	2500 J	2600	2600 J		2600	2500 J	2100	2100
Fluoride	mg/L	2	2	1.4	0.95	1	1	1.2	0.93	0.9		1.3	1.3	1.2	1.3
Iron	mg/L							27	32	37					
Lead	mg/L				0.000201	0.00013	3E-05 J	0.001 U	0.001 U	0.00089 J					
Lithium	mg/L				0.174	0.171	0.188	0.16	0.16	0.16					
Magnesium	mg/L	3.9	4.3	18			106	100	100	110		110	110	110	100
Manganese	mg/L						15	15	16						
Mercury	mg/L				5E-06 U	5E-06 U	5E-06 U	0.0002 U	0.0002 U	0.0002 U					
Molybdenum	mg/L				0.0089	0.00543	0.00249	0.0016 J	0.002 J	0.0027 J					
Nickel	mg/L						0.1	0.11	0.12						
pH, Field	pH units	7.88	7.8	7.29	6.88	6.52	6.5	6.51	6.52	6.51	6.56	6.35	6.4	6.81	6.36
Potassium	mg/L	3	3	5.3			9.01	7.8	7.8	8		6.4	6.4	6.4	5.6
Radium-226	pCi/L				0.31	0.344	0.322	0.181	0.192	0.327					
Radium-226/228	pCi/L				0.684	1.494	0.866	0.594	0.425	0.73					
Radium-228	pCi/L				0.374	1.15	0.544	0.413	0.234 U	0.404					
Redox Potential, Field	mV				-41	-55.5	-47.5								
Selenium	mg/L				0.0001 J	0.0002 J	0.0001 J	0.005 U	0.005 U	0.0015 J					
Silver	mg/L							0.001 U	0.001 U	0.001 U					
Sodium	mg/L	980	980	2400			64.6	52	51 B	53 B		26	28	28	27
Strontium	mg/L						3.08	3.6	3.3 B	3.2 B					
Sulfate	mg/L	110	94	19	1610	1810	1610	2200	1700	1600		1700	1800	1700	1500
Temperature, Field	deg C	13	14	14	16.53	15.4	12.1				12.4		12	13	14
Thallium	mg/L				0.000598	0.00033	9E-05 J	0.001 U	0.001 U	0.001 U					
Turbidity, Field	NTU	85.3	26	1.2	42.4	9.6	9.2	6.1	1.4	4.8	1	67	456	248	123
Vanadium	mg/L														
Zinc	mg/L							0.02 U	0.02	0.038					

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