

Annual Groundwater Monitoring Report

Kentucky Power Company

Mitchell Plant

Bottom Ash Pond

Moundsville, WV

January 2021

Prepared by:

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An **AEP** Company

*BOUNDLESS ENERGY*SM

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I. Overview

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

In general, the following activities were completed in 2020:

- Groundwater samples were collected on October 22, 2019 in accordance with 40 CFR 257.95(d)(1), and analyzed for all Appendix III constituents and those Appendix IV constituents that were detected during the previous sampling in accordance with 40 CFR 257.95(b) in June 2019. Groundwater samples were collected on March 17 and 18, 2020 and analyzed in accordance with 40 CFR 257.95(b) for all Appendix IV constituents. Groundwater samples were collected on May 5, 2020 in accordance with 40 CFR 257.95(d)(1), and analyzed for all Appendix III constituents and those Appendix IV constituents that were detected during the previous sampling in accordance with 40 CFR 257.95(b) in March 2020. Another groundwater sampling event in accordance with 40 CFR 257.95(d)(1) was initiated on October 20, 2020, but errors in sampling resulted in the omission of two monitoring parameters at some of the monitoring wells and the data set was not complete until January 2021, so data from this sampling event are not included in this report. All sampling was performed in accordance with 40 CFR 257.95 *et seq.*, and AEP's *Groundwater Sampling and Analysis Plan (2016)*;
- Groundwater monitoring data underwent various validation tests, including tests for completeness, valid values, transcription errors, and consistent units;
- Statistical analysis of the assessment monitoring samples collected in October 2019 and May 2020 was completed in February and August 2020, respectively.
- Because no statistically significant levels (SSLs) above the groundwater protection standard were detected, assessment monitoring continued.
- No alternative source demonstrations (ASDs) relative to the Appendix IV SSLs above the groundwater protection standard were conducted.
- As required by 40 CFR 257.95(d)(1), groundwater samples were collected and analyzed for all Appendix III constituents and those Appendix IV constituents that were detected during the March 2020 sampling in accordance with 40 CFR 257.95(b). This sampling was initiated in October 2020, but was not completed until January 2021 because of errors in sampling and the data has not yet undergone statistical interpretation.

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

- A map, aerial photograph or a drawing showing the CCR management unit(s), all groundwater monitoring wells and monitoring well identification numbers;
- All of the monitoring data collected, including the rate and direction of groundwater flow, plus a summary showing the number of samples collected per monitoring well, the dates the samples were collected, and whether the sample was collected as part of detection monitoring or assessment monitoring programs (Attached as Appendix 1);
- Statistical comparison of monitoring data to determine if there have been statistically significant levels above the groundwater protection standards (Attached as Appendix 2, where applicable);
- A discussion of whether any alternate source demonstrations were performed, and the conclusions (Attached as Appendix 3, where applicable);
- A summary of any transition between monitoring programs, for example the date and circumstances for transitioning from detection monitoring to assessment monitoring (Notices attached as Appendix 4, where applicable);
- Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a statement regarding the rationale for the installation/decommission (Attached as Appendix 5, where applicable); and
- Other information required to be included in the annual report such as an alternate monitoring frequency, or assessment of corrective measures, if applicable.

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

II. Groundwater Monitoring Well Locations and Identification Numbers

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

III. Monitoring Wells Installed or Decommissioned

There were no monitoring wells installed or decommissioned in 2020. The network design, as summarized in the *Groundwater Monitoring Network Design Report* (2016) and as posted at the CCR web site for Mitchell Plant, did not change. That design report, viewable on the AEP CCR web site, discusses the facility location, the hydrogeological setting, the hydrostratigraphic units, the uppermost aquifer, downgradient monitoring well locations and the upgradient monitoring well locations.

IV. Groundwater Quality Data and Static Water Elevation Data, With Flow Rate and Direction and Discussion

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

V. Groundwater Quality Data Statistical Analysis

Statistical analysis of the assessment monitoring samples collected on October 22, 2019 and on May 5, 2020 was completed on February 11, and August 24, 2020, respectively. No SSLs above the groundwater protection standards were identified during either analysis. The results of these statistical analyses are documented in the corresponding statistical analysis summary reports, which are provided in Appendix 2.

As required by 40 CFR 257.95(d)(1), groundwater samples were collected and analyzed for all Appendix III constituents and those Appendix IV constituents that were detected during the March 2020 sampling in accordance with 40 CFR 257.95(b). This sampling was initiated in October 2020, but was not completed until January 2021 because of errors in sampling and the data has not yet undergone statistical interpretation. Statistical analysis of this data is scheduled to be completed in February 2021.

VI. Alternative Source Demonstrations

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

VII. Discussion About Transition Between Monitoring Requirements or Alternate Monitoring Frequency

No transition between monitoring requirements occurred in 2020; the CCR unit remained in assessment monitoring over the entire year. A statement to this effect is provided in Appendix 4.

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

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

VIII. Other Information Required

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

IX. Description of Any Problems Encountered in 2020 and Actions Taken

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

X. A Projection of Key Activities for the Upcoming Year

Key activities for 2021 include the following:

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

APPENDIX 1 - Groundwater Data Tables and Figures

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

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

| Collection Date | Monitoring Program | Boron | Calcium | Chloride | Fluoride | pH | Sulfate | Total Dissolved Solids |
|-----------------|--------------------|--------|---------|----------|----------|-----|---------|------------------------|
| | | mg/L | mg/L | mg/L | mg/L | SU | mg/L | mg/L |
| 6/13/2016 | Background | 0.054 | 220 | 99.1 | 0.23 | 6.9 | 375 | 990 |
| 8/1/2016 | Background | 0.070 | 220 | 103 | 0.25 | 7.0 | 403 | 970 |
| 9/26/2016 | Background | 0.098 | 225 | 103 | 0.24 | 7.1 | 389 | 946 |
| 11/8/2016 | Background | 0.053 | 219 | 92.8 | 0.19 | 7.1 | 369 | 930 |
| 2/7/2017 | Background | 0.162 | 218 | 81.7 | 0.20 | 7.1 | 291 | 904 |
| 4/4/2017 | Background | 0.105 | 237 | 89.8 | 0.21 | 7.3 | 362 | 924 |
| 5/16/2017 | Background | 0.113 | 225 | 93.5 | 0.22 | 7.2 | 371 | 995 |
| 7/19/2017 | Background | 0.129 | 230 | 96.3 | 0.15 | 7.2 | 405 | 999 |
| 10/9/2017 | Detection | 0.114 | 212 | 93.4 | 0.24 | 7.2 | 392 | 982 |
| 4/11/2018 | Assessment | 0.063 | 204 | 83.6 | 0.19 | 7.0 | 291 | 842 |
| 8/22/2018 | Assessment | 0.096 | 230 | 91.9 | 0.20 | 7.3 | 372 | 936 |
| 5/1/2019 | Assessment | 0.05 J | 220 | 81.8 | 0.17 | 8.0 | 317 | 926 |
| 6/11/2019 | Assessment | 0.04 J | 183 | 78.5 | 0.17 | 7.6 | 261 | 829 |
| 10/22/2019 | Assessment | 0.02 J | 196 | 85.9 | 0.15 | 7.3 | 242 | 801 |
| 3/17/2020 | Assessment | -- | -- | -- | 0.15 | 7.1 | -- | -- |
| 5/5/2020 | Assessment | 0.04 J | 230 | 96.2 | 0.12 | 7.5 | 372 | 1,020 |

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

--: Not analyzed

Table 1 - Groundwater Data Summary: MW-1504

Mitchell - BAP
Appendix IV Constituents

| Collection Date | Monitoring Program | Antimony | Arsenic | Barium | Beryllium | Cadmium | Chromium | Cobalt | Combined Radium | Fluoride | Lead | Lithium | Mercury | Molybdenum | Selenium | Thallium |
|-----------------|--------------------|----------|---------|--------|-----------|----------|----------|--------|-----------------|----------|----------|------------|-----------|------------|----------|----------|
| | | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L |
| 6/13/2016 | Background | 0.03 J | 0.73 | 46.2 | 0.01 J | 0.04 | 0.4 | 0.523 | 0.0838 | 0.23 | 0.379 | 0.002 | < 0.002 U | 0.59 | 0.1 | 0.02 J |
| 8/1/2016 | Background | 0.02 J | 0.52 | 42.7 | 0.009 J | 0.04 | 0.5 | 0.549 | 0.248 | 0.25 | 0.222 | < 0.0002 U | 0.002 J | 0.74 | 0.07 J | 0.02 J |
| 9/26/2016 | Background | < 0.05 U | 0.38 | 36.7 | < 0.02 U | 0.03 J | 0.3 | 0.362 | 0.656 | 0.24 | 0.104 | 0.007 | < 0.002 U | 2.31 | 0.2 J | 0.1 J |
| 11/8/2016 | Background | 0.02 J | 0.36 | 38.4 | < 0.005 U | 0.03 | 0.469 | 0.249 | 1.748 | 0.19 | 0.041 | 0.004 | < 0.002 U | 0.66 | < 0.03 U | 0.089 |
| 2/7/2017 | Background | 0.02 J | 0.39 | 33.8 | < 0.005 U | 0.03 | 0.530 | 0.239 | 0.563 | 0.20 | 0.022 | 0.008 | < 0.002 U | 0.94 | < 0.03 U | 0.090 |
| 4/4/2017 | Background | 0.02 J | 0.35 | 40.5 | < 0.005 U | 0.04 | 0.283 | 0.277 | 0.327 | 0.21 | 0.021 | 0.009 | < 0.002 U | 0.81 | 0.06 J | 0.110 |
| 5/16/2017 | Background | 0.02 J | 0.46 | 37.3 | < 0.004 U | 0.04 | 0.250 | 0.319 | 0.3882 | 0.22 | 0.01 J | 0.011 | < 0.002 U | 0.55 | 0.05 J | 0.02 J |
| 7/19/2017 | Background | 0.03 J | 0.41 | 34.9 | < 0.004 U | 0.04 | 0.175 | 0.382 | 0.401 | 0.15 | 0.087 | 0.012 | < 0.002 U | 1.25 | < 0.03 U | 0.03 J |
| 4/11/2018 | Assessment | 0.02 J | 0.36 | 36.9 | 0.005 J | 0.03 | 0.562 | 0.114 | 0.349 | 0.19 | 0.052 | 0.004 | < 0.004 U | 0.41 | 0.04 J | 0.03 J |
| 8/22/2018 | Assessment | 0.05 J | 0.28 | 37.9 | < 0.004 U | 0.03 | 0.331 | 0.093 | 1.048 | 0.20 | 0.037 | 0.006 | < 0.002 U | 0.33 | 0.04 J | 0.03 J |
| 5/1/2019 | Assessment | < 0.02 U | 0.22 | 36.4 | < 0.02 U | 0.03 J | 0.305 | 0.071 | 0.675 | 0.17 | 0.02 J | < 0.009 U | < 0.002 U | < 0.4 U | < 0.03 U | < 0.1 U |
| 6/11/2019 | Assessment | < 0.02 U | 0.24 | 33.5 | < 0.02 U | < 0.01 U | 0.05 J | 0.04 J | 0.261 | 0.17 | < 0.02 U | < 0.009 U | < 0.002 U | < 0.4 U | 0.7 | < 0.1 U |
| 10/22/2019 | Assessment | 0.06 J | 0.29 | 37.0 | < 0.02 U | 0.03 J | 0.399 | 0.475 | 0.613 | 0.15 | < 0.05 U | 0.00448 | < 0.002 U | < 0.4 U | 0.05 J | < 0.1 U |
| 3/17/2020 | Assessment | < 0.02 U | 0.29 | 48.3 | < 0.02 U | 0.03 J | 0.238 | 0.04 J | 0.4423 | 0.15 | < 0.05 U | 0.00441 | < 0.002 U | < 0.4 U | 7.3 | < 0.1 U |
| 5/5/2020 | Assessment | < 0.02 U | 0.26 | 43.8 | < 0.02 U | 0.03 J | 0.238 | 0.03 J | 0.758 | 0.12 | < 0.05 U | 0.00442 | < 0.002 U | < 0.4 U | 3.8 | < 0.1 U |

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

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

| Collection Date | Monitoring Program | Boron | Calcium | Chloride | Fluoride | pH | Sulfate | Total Dissolved Solids |
|-----------------|--------------------|-------|---------|----------|----------|-----|---------|------------------------|
| | | mg/L | mg/L | mg/L | mg/L | SU | mg/L | mg/L |
| 6/14/2016 | Background | 10.8 | 288 | 365 | < 0.05 U | 7.1 | 337 | 1,530 |
| 8/1/2016 | Background | 10.6 | 294 | 358 | < 0.05 U | 7.1 | 337 | 1,580 |
| 9/26/2016 | Background | 10.3 | 289 | 345 | < 0.05 U | 7.2 | 317 | 1,420 |
| 11/8/2016 | Background | 9.12 | 261 | 316 | < 0.05 U | 7.2 | 307 | 1,470 |
| 2/7/2017 | Background | 10.0 | 296 | 318 | < 0.05 U | 7.2 | 317 | 1,340 |
| 4/4/2017 | Background | 8.80 | 293 | 303 | < 0.05 U | 7.3 | 324 | 1,350 |
| 5/16/2017 | Background | 10.1 | 278 | 298 | < 0.05 U | 7.2 | 316 | 1,550 |
| 7/19/2017 | Background | 9.13 | 267 | 293 | < 0.05 U | 7.3 | 318 | 1,390 |
| 10/10/2017 | Detection | 8.70 | 255 | 287 | < 0.05 U | 7.2 | 327 | 1,270 |
| 12/27/2017 | Detection | 8.02 | 259 | 288 | -- | 7.3 | -- | 1,220 |
| 4/11/2018 | Assessment | 8.00 | 282 | 289 | < 0.05 U | 7.0 | 401 | 1,220 |
| 8/22/2018 | Assessment | 8.00 | 274 | 284 | 0.02 J | 7.3 | 383 | 1,520 |
| 5/1/2019 | Assessment | 7.31 | 287 | 285 | < 0.01 U | 7.8 | 408 | 1,580 |
| 6/11/2019 | Assessment | 7.79 | 279 | 261 | 0.03 J | 7.7 | 404 | 1,450 |
| 10/22/2019 | Assessment | 7.37 | 285 | 260 | 0.03 J | 7.2 | 455 | 1,480 |
| 3/17/2020 | Assessment | -- | -- | -- | 0.03 J | 7.2 | -- | -- |
| 5/5/2020 | Assessment | 7.36 | 282 | 252 | 0.02 J | 7.5 | 471 | 1,460 |

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

--: Not analyzed

Table 1 - Groundwater Data Summary: MW-1505

Mitchell - BAP
Appendix IV Constituents

| Collection Date | Monitoring Program | Antimony | Arsenic | Barium | Beryllium | Cadmium | Chromium | Cobalt | Combined Radium | Fluoride | Lead | Lithium | Mercury | Molybdenum | Selenium | Thallium |
|-----------------|--------------------|----------|---------|--------|-----------|---------|----------|--------|-----------------|----------|----------|-----------|-----------|------------|----------|----------|
| | | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L |
| 6/14/2016 | Background | 0.06 | 1.40 | 57.7 | 0.049 | 0.03 | 33.2 | 0.966 | 0.466 | < 0.05 U | 1.02 | 0.006 | 0.002 J | 2.94 | 0.2 | 0.074 |
| 8/1/2016 | Background | 0.11 | 3.73 | 81.0 | 0.150 | 0.05 | 10.4 | 2.69 | 1.2271 | < 0.05 U | 3.69 | 0.011 | 0.013 | 0.95 | 0.9 | 0.093 |
| 9/26/2016 | Background | < 0.05 U | 0.79 | 47.2 | < 0.02 U | 0.03 J | 0.9 | 0.404 | 0.912 | < 0.05 U | 0.546 | 0.008 | < 0.002 U | 7.35 | 0.4 J | 0.464 |
| 11/8/2016 | Background | 0.07 | 2.14 | 63.3 | 0.091 | 0.03 | 7.07 | 1.77 | 1.26 | < 0.05 U | 2.06 | 0.007 | 0.006 | 0.90 | 0.5 | 0.093 |
| 2/7/2017 | Background | 0.04 J | 1.16 | 51.7 | 0.035 | 0.03 | 9.06 | 0.772 | 1.236 | < 0.05 U | 0.697 | 0.010 | 0.002 J | 1.21 | 0.5 | 0.102 |
| 4/4/2017 | Background | 0.03 J | 0.41 | 47.2 | < 0.005 U | 0.02 | 11.0 | 0.509 | 0.4842 | < 0.05 U | 0.091 | 0.007 | < 0.002 U | 1.54 | 0.3 | 0.057 |
| 5/16/2017 | Background | 0.04 J | 0.73 | 45.5 | 0.01 J | 0.02 | 4.93 | 0.594 | 0.604 | < 0.05 U | 0.224 | 0.017 | < 0.002 U | 0.85 | 0.4 | 0.067 |
| 7/19/2017 | Background | 0.04 J | 0.78 | 45.9 | 0.02 J | 0.03 J | 2.38 | 0.628 | 1.222 | < 0.05 U | 0.434 | 0.012 | < 0.002 U | 1.69 | 0.9 | 0.08 J |
| 4/11/2018 | Assessment | 0.03 J | 0.44 | 46.0 | 0.006 J | 0.03 | 1.16 | 0.151 | 0.582 | < 0.05 U | 0.116 | 0.005 | < 0.002 U | 0.67 | 0.7 | 0.065 |
| 8/22/2018 | Assessment | 0.05 J | 0.38 | 48.0 | 0.007 J | 0.03 | 1.40 | 0.257 | 0.576 | 0.02 J | 0.150 | 0.008 | < 0.002 U | 1.35 | 0.4 | 0.070 |
| 5/1/2019 | Assessment | 0.03 J | 0.29 | 48.7 | < 0.02 U | 0.03 J | 0.665 | 0.199 | 0.2396 | < 0.01 U | 0.07 J | < 0.009 U | < 0.002 U | 0.6 J | 0.9 | < 0.1 U |
| 6/11/2019 | Assessment | 0.03 J | 0.28 | 49.3 | < 0.02 U | 0.03 J | 0.849 | 0.155 | 0.526 | 0.03 J | 0.04 J | 0.01 J | < 0.002 U | 0.7 J | 0.4 | < 0.1 U |
| 10/22/2019 | Assessment | 0.03 J | 0.34 | 49.9 | < 0.02 U | 0.03 J | 0.450 | 0.143 | 0.759 | 0.03 J | < 0.05 U | 0.00534 | < 0.002 U | < 0.4 U | 0.1 J | < 0.1 U |
| 3/17/2020 | Assessment | < 0.02 U | 0.31 | 42.8 | < 0.02 U | 0.02 J | 0.624 | 0.100 | 0.715 | 0.03 J | < 0.05 U | 0.00501 | < 0.002 U | < 0.4 U | 0.06 J | < 0.1 U |
| 5/5/2020 | Assessment | 0.03 J | 0.27 | 48.4 | < 0.02 U | 0.03 J | 0.291 | 0.096 | 0.7905 | 0.02 J | < 0.05 U | 0.00493 | < 0.002 U | < 0.4 U | 0.06 J | < 0.1 U |

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

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

| Collection Date | Monitoring Program | Boron | Calcium | Chloride | Fluoride | pH | Sulfate | Total Dissolved Solids |
|-----------------|--------------------|-------|---------|----------|----------|-----|---------|------------------------|
| | | mg/L | mg/L | mg/L | mg/L | SU | mg/L | mg/L |
| 6/14/2016 | Background | 8.04 | 275 | 422 | 0.07 J | 7.1 | 315 | 1,640 |
| 8/2/2016 | Background | 9.72 | 299 | 418 | 0.07 J | 7.0 | 325 | 1,600 |
| 9/27/2016 | Background | 6.77 | 304 | 428 | < 0.05 U | 7.2 | 323 | 1,610 |
| 11/9/2016 | Background | 5.50 | 281 | 392 | < 0.05 U | 7.4 | 285 | 1,510 |
| 2/8/2017 | Background | 5.70 | 289 | 395 | < 0.05 U | 7.3 | 292 | 1,350 |
| 4/5/2017 | Background | 5.59 | 282 | 389 | < 0.05 U | 7.4 | 301 | 1,430 |
| 5/17/2017 | Background | 7.11 | 278 | 393 | < 0.05 U | 7.3 | 307 | 1,520 |
| 7/19/2017 | Background | 6.26 | 277 | 379 | < 0.05 U | 7.3 | 297 | 1,480 |
| 10/10/2017 | Detection | 8.03 | 257 | 357 | < 0.05 U | 7.3 | 326 | 1,390 |
| 12/27/2017 | Detection | 6.14 | 264 | 383 | -- | 7.3 | -- | 1,280 |
| 4/11/2018 | Assessment | 5.73 | 275 | 382 | < 0.05 U | 7.1 | 347 | 1,300 |
| 8/22/2018 | Assessment | 5.91 | 270 | 369 | 0.05 J | 7.4 | 349 | 1,590 |
| 5/1/2019 | Assessment | 5.24 | 280 | 331 | 0.03 J | 7.9 | 347 | 1,360 |
| 6/11/2019 | Assessment | 5.27 | 265 | 315 | 0.05 J | 7.8 | 335 | 1,370 |
| 10/22/2019 | Assessment | 4.49 | 293 | 364 | 0.04 J | 7.4 | 354 | 1,330 |
| 3/17/2020 | Assessment | -- | -- | -- | 0.04 J | 7.3 | -- | -- |
| 5/5/2020 | Assessment | 4.07 | 290 | 379 | 0.03 J | 7.5 | 337 | 1,530 |

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

--: Not analyzed

Table 1 - Groundwater Data Summary: MW-1506

Mitchell - BAP
Appendix IV Constituents

| Collection Date | Monitoring Program | Antimony | Arsenic | Barium | Beryllium | Cadmium | Chromium | Cobalt | Combined Radium | Fluoride | Lead | Lithium | Mercury | Molybdenum | Selenium | Thallium |
|-----------------|--------------------|----------|---------|--------|-----------|---------|----------|--------|-----------------|----------|-------|-----------|-----------|------------|----------|----------|
| | | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L |
| 6/14/2016 | Background | 0.07 | 1.65 | 73.0 | 0.053 | 0.04 | 1.1 | 1.31 | 0.488 | 0.07 J | 1.25 | 0.006 | 0.004 J | 0.74 | 0.2 | 0.070 |
| 8/2/2016 | Background | 0.05 J | 1.01 | 70.4 | 0.026 | 0.04 | 0.8 | 0.799 | 0.67 | 0.07 J | 0.601 | 0.015 | 0.003 J | 0.68 | 0.09 J | 0.060 |
| 9/27/2016 | Background | 0.05 J | 1.14 | 62.0 | 0.030 | 0.03 | 1.0 | 0.739 | 1.263 | < 0.05 U | 0.744 | 0.015 | 0.002 J | 0.55 | 0.2 | 0.064 |
| 11/9/2016 | Background | 0.03 J | 0.64 | 57.4 | 0.01 J | 0.02 J | 0.959 | 0.251 | 2.196 | < 0.05 U | 0.272 | 0.008 | < 0.002 U | 0.45 | 0.07 J | 0.05 J |
| 2/8/2017 | Background | 0.03 J | 0.62 | 52.9 | 0.008 J | 0.02 J | 4.28 | 0.305 | 0.4008 | < 0.05 U | 0.217 | 0.013 | < 0.002 U | 1.07 | < 0.03 U | 0.066 |
| 4/5/2017 | Background | 0.04 J | 0.81 | 60.1 | 0.021 | 0.02 | 3.87 | 0.891 | 0.438 | < 0.05 U | 0.574 | 0.011 | 0.002 J | 0.49 | 0.08 J | 0.04 J |
| 5/17/2017 | Background | 0.05 J | 1.26 | 60.9 | 0.027 | 0.03 | 2.83 | 0.768 | 0.226 | < 0.05 U | 0.726 | 0.016 | 0.002 J | 1.22 | 0.1 | 0.05 J |
| 7/19/2017 | Background | 0.18 | 0.80 | 54.9 | 0.02 J | 0.02 J | 3.15 | 0.932 | 0.889 | < 0.05 U | 0.457 | 0.016 | < 0.002 U | 1.14 | < 0.06 U | 0.06 J |
| 4/11/2018 | Assessment | 0.03 J | 0.73 | 55.4 | 0.021 | 0.02 J | 2.01 | 0.476 | 0.592 | < 0.05 U | 0.477 | 0.009 | 0.002 J | 1.23 | 0.1 | 0.05 J |
| 8/22/2018 | Assessment | 0.06 | 0.46 | 54.6 | 0.01 J | 0.02 | 2.47 | 0.581 | 1.723 | 0.05 J | 0.319 | 0.010 | < 0.002 U | 0.50 | 0.09 J | 0.050 |
| 5/1/2019 | Assessment | 0.03 J | 0.34 | 53.5 | < 0.02 U | 0.02 J | 0.752 | 0.256 | 0.1879 | 0.03 J | 0.135 | 0.02 J | < 0.002 U | 2 J | 0.07 J | < 0.1 U |
| 6/11/2019 | Assessment | 0.03 J | 0.42 | 49.8 | < 0.02 U | 0.01 J | 1.11 | 0.290 | 1.009 | 0.05 J | 0.234 | < 0.009 U | < 0.002 U | 0.4 J | 0.04 J | < 0.1 U |
| 10/22/2019 | Assessment | 0.03 J | 0.37 | 52.7 | < 0.02 U | 0.02 J | 0.708 | 0.167 | 0.997 | 0.04 J | 0.1 J | 0.00873 | < 0.002 U | 2 J | 0.04 J | < 0.1 U |
| 3/17/2020 | Assessment | < 0.02 U | 0.44 | 53.0 | < 0.02 U | 0.01 J | 4.24 | 0.393 | < 0.680 U | 0.04 J | 0.213 | 0.00825 | < 0.002 U | 1 J | 0.09 J | < 0.1 U |
| 5/5/2020 | Assessment | 0.02 J | 0.33 | 52.2 | < 0.02 U | 0.01 J | 0.592 | 0.162 | 0.478 | 0.03 J | 0.2 J | 0.00782 | < 0.002 U | 0.7 J | < 0.03 U | < 0.1 U |

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-1507

Mitchell - BAP

Appendix III Constituents

| Collection Date | Monitoring Program | Boron | Calcium | Chloride | Fluoride | pH | Sulfate | Total Dissolved Solids |
|-----------------|--------------------|-------|---------|----------|----------|-----|---------|------------------------|
| | | mg/L | mg/L | mg/L | mg/L | SU | mg/L | mg/L |
| 6/14/2016 | Background | 13.2 | 333 | 529 | 0.06 J | 7.0 | 339 | 1,070 |
| 8/2/2016 | Background | 12.2 | 323 | 497 | 0.07 J | 7.0 | 332 | 1,890 |
| 9/27/2016 | Background | 14.1 | 355 | 517 | 0.06 J | 7.1 | 345 | 1,840 |
| 11/9/2016 | Background | 12.1 | 325 | 480 | 0.06 J | 7.1 | 314 | 1,840 |
| 2/8/2017 | Background | 11.1 | 312 | 401 | 0.06 J | 7.1 | 276 | 1,480 |
| 4/5/2017 | Background | 10.6 | 324 | 445 | 0.05 J | 7.2 | 306 | 1,630 |
| 5/17/2017 | Background | 12.1 | 308 | 437 | 0.05 J | 7.2 | 310 | 1,680 |
| 7/19/2017 | Background | 11.1 | 298 | 447 | < 0.05 U | 7.2 | 308 | 1,740 |
| 10/10/2017 | Detection | 10.7 | 289 | 430 | 0.06 J | 7.2 | 316 | 1,660 |
| 12/27/2017 | Detection | 10.4 | 284 | 450 | -- | 7.2 | -- | 1,380 |
| 4/11/2018 | Assessment | 10.4 | 296 | 400 | 0.06 J | 6.9 | 347 | 1,390 |
| 8/21/2018 | Assessment | 9.29 | 272 | 331 | 0.07 | 7.2 | 323 | 1,430 |
| 5/1/2019 | Assessment | 8.36 | 271 | 296 | 0.07 | 8.0 | 346 | 1,270 |
| 6/11/2019 | Assessment | 8.41 | 257 | 279 | 0.07 | 7.8 | 349 | 1,340 |
| 10/22/2019 | Assessment | 8.39 | 273 | 295 | 0.08 | 7.4 | 369 | 1,360 |
| 3/18/2020 | Assessment | -- | -- | -- | 0.07 | 7.2 | -- | -- |
| 5/5/2020 | Assessment | 7.72 | 262 | 310 | 0.05 J | 7.4 | 350 | 1,330 |

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

--: Not analyzed

Table 1 - Groundwater Data Summary: MW-1507

Mitchell - BAP
Appendix IV Constituents

| Collection Date | Monitoring Program | Antimony | Arsenic | Barium | Beryllium | Cadmium | Chromium | Cobalt | Combined Radium | Fluoride | Lead | Lithium | Mercury | Molybdenum | Selenium | Thallium |
|-----------------|--------------------|----------|---------|--------|-----------|---------|----------|--------|-----------------|----------|----------|-----------|-----------|------------|----------|----------|
| | | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L |
| 6/14/2016 | Background | 0.05 J | 2.19 | 84.5 | 0.142 | 0.07 | 3.6 | 3.18 | 0.521 | 0.06 J | 4.07 | 0.011 | 0.025 | 0.25 | 0.7 | 0.051 |
| 8/2/2016 | Background | 0.12 | 4.54 | 104 | 0.168 | 0.07 | 10.4 | 4.10 | 2.09 | 0.07 J | 4.48 | 0.019 | 0.016 | 2.14 | 0.5 | 0.078 |
| 9/27/2016 | Background | 0.10 | 3.58 | 92.0 | 0.134 | 0.06 | 14.0 | 3.06 | 2.029 | 0.06 J | 2.96 | 0.020 | 0.010 | 1.80 | 0.5 | 0.08 J |
| 11/9/2016 | Background | 0.11 | 4.15 | 102 | 0.202 | 0.07 | 12.6 | 4.50 | 1.784 | 0.06 J | 3.97 | 0.016 | 0.010 | 12.8 | 0.5 | 0.09 J |
| 2/8/2017 | Background | 0.08 | 2.16 | 73.6 | 0.089 | 0.04 | 6.16 | 1.77 | 16.587 | 0.06 J | 1.86 | 0.013 | 0.007 | 2.31 | 0.3 | 0.081 |
| 4/5/2017 | Background | 0.06 | 1.51 | 71.3 | 0.053 | 0.04 | 19.4 | 1.26 | 0.6 | 0.05 J | 1.17 | 0.011 | 0.006 | 5.29 | 0.2 | 0.053 |
| 5/17/2017 | Background | 0.11 | 1.30 | 63.6 | 0.031 | 0.04 | 12.6 | 0.990 | 0.767 | 0.05 J | 0.799 | 0.024 | 0.003 J | 4.54 | 0.2 | 0.04 J |
| 7/19/2017 | Background | 0.06 J | 1.29 | 62.0 | 0.044 | 0.04 | 12.1 | 2.37 | 1.215 | < 0.05 U | 0.999 | 0.018 | 0.004 J | 4.37 | 0.1 J | 0.06 J |
| 4/11/2018 | Assessment | 0.07 | 1.67 | 71.2 | 0.062 | 0.04 | 21.3 | 1.45 | 0.701 | 0.06 J | 1.56 | 0.012 | 0.006 | 2.73 | 0.3 | 0.059 |
| 8/21/2018 | Assessment | 0.08 | 0.47 | 62.1 | 0.01 J | 0.03 | 2.00 | 0.426 | 1.419 | 0.07 | 0.308 | 0.010 | 0.002 J | 0.87 | 0.08 J | 0.05 J |
| 5/1/2019 | Assessment | 0.03 J | 0.43 | 53.9 | < 0.02 U | 0.03 J | 2.35 | 0.331 | 0.496 | 0.07 | 0.239 | < 0.009 U | < 0.002 U | 1 J | 0.07 J | < 0.1 U |
| 6/11/2019 | Assessment | 0.03 J | 0.24 | 52.2 | < 0.02 U | 0.03 J | 0.315 | 0.160 | 1.454 | 0.07 | < 0.02 U | 0.01 J | 0.003 J | 0.4 J | 0.04 J | < 0.1 U |
| 10/22/2019 | Assessment | 0.03 J | 0.45 | 54.8 | < 0.02 U | 0.03 J | 1.51 | 0.343 | 0.952 | 0.08 | 0.239 | 0.00814 | 0.003 J | < 0.4 U | 0.08 J | < 0.1 U |
| 3/18/2020 | Assessment | < 0.02 U | 0.44 | 53.0 | < 0.02 U | 0.03 J | 2.69 | 0.342 | 0.381 | 0.07 | 0.217 | 0.00794 | < 0.002 U | 0.8 J | 0.06 J | < 0.1 U |
| 5/5/2020 | Assessment | 0.03 J | 0.42 | 53.1 | < 0.02 U | 0.03 J | 1.30 | 0.345 | 0.836 | 0.05 J | 0.208 | 0.00757 | < 0.002 U | 0.7 J | 0.08 J | < 0.1 U |

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

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

| Collection Date | Monitoring Program | Boron | Calcium | Chloride | Fluoride | pH | Sulfate | Total Dissolved Solids |
|-----------------|--------------------|-------|---------|----------|----------|-----|---------|------------------------|
| | | mg/L | mg/L | mg/L | mg/L | SU | mg/L | mg/L |
| 6/14/2016 | Background | 0.509 | 204 | 211 | 0.1 J | 6.9 | 291 | 1,060 |
| 8/1/2016 | Background | 0.690 | 218 | 237 | 0.1 J | 7.0 | 302 | 1,100 |
| 9/26/2016 | Background | 1.03 | 215 | 238 | 0.1 J | 7.0 | 304 | 1,110 |
| 11/8/2016 | Background | 1.36 | 234 | 227 | 0.08 J | 7.2 | 304 | 1,140 |
| 2/8/2017 | Background | 1.04 | 236 | 220 | 0.08 J | 7.1 | 301 | 1,070 |
| 4/5/2017 | Background | 0.780 | 228 | 215 | 0.08 J | 7.2 | 311 | 1,070 |
| 5/16/2017 | Background | 0.846 | 218 | 208 | 0.07 J | 7.1 | 296 | 1,130 |
| 7/18/2017 | Background | 1.00 | 224 | 214 | 0.06 J | 7.1 | 305 | 1,110 |
| 10/9/2017 | Detection | 0.881 | 207 | 212 | 0.08 J | 7.1 | 322 | 1,200 |
| 4/11/2018 | Assessment | 0.806 | 229 | 200 | 0.08 | 6.9 | 302 | 1,050 |
| 8/21/2018 | Assessment | 0.952 | 219 | 204 | 0.08 | 7.2 | 313 | 1,080 |
| 5/1/2019 | Assessment | 0.622 | 221 | 178 | 0.08 | 8.2 | 287 | 978 |
| 6/12/2019 | Assessment | 0.679 | 209 | 163 | 0.08 | 7.1 | 285 | 988 |
| 10/22/2019 | Assessment | 0.860 | 212 | 168 | 0.09 | 7.3 | 309 | 991 |
| 3/18/2020 | Assessment | -- | -- | -- | 0.08 | 7.2 | -- | -- |
| 5/6/2020 | Assessment | 0.486 | 198 | 148 | 0.06 | 7.2 | 273 | 947 |

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

--: Not analyzed

Table 1 - Groundwater Data Summary: MW-1508

Mitchell - BAP

Appendix IV Constituents

| Collection Date | Monitoring Program | Antimony | Arsenic | Barium | Beryllium | Cadmium | Chromium | Cobalt | Combined Radium | Fluoride | Lead | Lithium | Mercury | Molybdenum | Selenium | Thallium |
|-----------------|--------------------|----------|---------|--------|-----------|---------|----------|--------|-----------------|----------|-------|------------|-----------|------------|----------|----------|
| | | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L |
| 6/14/2016 | Background | 0.04 J | 1.05 | 48.7 | 0.038 | 0.09 | 0.8 | 3.21 | 0.763 | 0.1 J | 1.61 | 0.009 | 0.003 J | 0.93 | 0.5 | 0.04 J |
| 8/1/2016 | Background | 0.04 J | 1.07 | 51.7 | 0.037 | 0.07 | 1.2 | 2.22 | 0.0803 | 0.1 J | 1.34 | < 0.0002 U | 0.008 | 0.74 | 0.7 | 0.03 J |
| 9/26/2016 | Background | 0.06 J | 1.65 | 50.2 | 0.06 J | 0.07 J | 2.3 | 2.34 | 0.596 | 0.1 J | 1.69 | 0.007 | 0.003 J | 1.17 | 0.8 | < 0.05 U |
| 11/8/2016 | Background | 0.05 J | 1.32 | 53.9 | 0.058 | 0.05 | 1.70 | 2.17 | 2.782 | 0.08 J | 2.06 | 0.003 | 0.002 J | 0.63 | 0.7 | 0.03 J |
| 2/8/2017 | Background | 0.04 J | 0.97 | 46.1 | 0.042 | 0.04 | 1.34 | 1.40 | 12.465 | 0.08 J | 1.32 | 0.009 | 0.003 J | 0.53 | 0.7 | 0.04 J |
| 4/5/2017 | Background | 0.04 J | 1.09 | 49.9 | 0.049 | 0.04 | 1.74 | 1.66 | 0.394 | 0.08 J | 1.71 | 0.008 | 0.004 J | 0.35 | 0.9 | 0.03 J |
| 5/16/2017 | Background | 0.04 J | 1.21 | 47.0 | 0.041 | 0.03 | 1.32 | 1.12 | 0.931 | 0.07 J | 1.13 | 0.014 | < 0.002 U | 0.46 | 0.9 | 0.04 J |
| 7/18/2017 | Background | 0.04 J | 1.11 | 45.1 | 0.040 | 0.04 | 1.33 | 1.27 | 0.597 | 0.06 J | 1.20 | 0.012 | < 0.002 U | 0.68 | 0.6 | 0.04 J |
| 4/11/2018 | Assessment | 0.04 J | 1.04 | 46.4 | 0.040 | 0.04 | 1.40 | 1.03 | 0.236 | 0.08 | 1.11 | 0.008 | < 0.004 U | 0.45 | 0.7 | 0.05 J |
| 8/21/2018 | Assessment | 0.06 | 0.44 | 40.1 | 0.01 J | 0.04 | 0.691 | 0.678 | 0.3152 | 0.08 | 0.384 | 0.007 | < 0.002 U | 0.25 | 0.4 | 0.03 J |
| 5/1/2019 | Assessment | 0.03 J | 0.60 | 37.4 | 0.02 J | 0.03 J | 0.735 | 0.637 | 0.636 | 0.08 | 0.540 | < 0.009 U | < 0.002 U | < 0.4 U | 0.3 | < 0.1 U |
| 6/12/2019 | Assessment | < 0.02 U | 0.41 | 35.2 | < 0.02 U | 0.03 J | 0.590 | 0.419 | 0.295 | 0.08 | 0.336 | < 0.009 U | < 0.002 U | < 0.4 U | 0.2 | < 0.1 U |
| 10/22/2019 | Assessment | 0.05 J | 0.35 | 34.8 | < 0.02 U | 0.03 J | 1.20 | 0.521 | 1.491 | 0.09 | 0.2 J | 0.00485 | < 0.002 U | 0.6 J | 0.3 | < 0.1 U |
| 3/18/2020 | Assessment | < 0.02 U | 0.52 | 36.2 | < 0.02 U | 0.03 J | 0.820 | 0.481 | 0.636 | 0.08 | 0.298 | 0.00484 | < 0.002 U | 0.8 J | 0.1 J | < 0.1 U |
| 5/6/2020 | Assessment | < 0.02 U | 0.44 | 35.4 | < 0.02 U | 0.03 J | 0.654 | 0.413 | 0.5934 | 0.06 | 0.311 | 0.00483 | < 0.002 U | 0.7 J | 0.1 J | < 0.1 U |

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

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

| Collection Date | Monitoring Program | Boron | Calcium | Chloride | Fluoride | pH | Sulfate | Total Dissolved Solids |
|-----------------|--------------------|-------|---------|----------|----------|-----|---------|------------------------|
| | | mg/L | mg/L | mg/L | mg/L | SU | mg/L | mg/L |
| 6/14/2016 | Background | 12.4 | 280 | 435 | 0.16 | 7.0 | 380 | 1,730 |
| 8/9/2016 | Background | 11.6 | 292 | 401 | 0.16 | 7.1 | 388 | 1,670 |
| 9/27/2016 | Background | 10.6 | 292 | 371 | 0.1 J | 7.1 | 418 | 1,540 |
| 11/8/2016 | Background | 8.29 | 258 | 333 | 0.1 J | 7.1 | 400 | 1,410 |
| 2/7/2017 | Background | 7.65 | 280 | 360 | 0.15 | 7.1 | 416 | 1,450 |
| 4/5/2017 | Background | 6.22 | 290 | 358 | 0.1 J | 7.2 | 416 | 1,560 |
| 5/17/2017 | Background | 7.36 | 284 | 354 | 0.1 J | 7.2 | 420 | 1,520 |
| 7/19/2017 | Background | 6.54 | 279 | 346 | 0.1 J | 7.2 | 418 | 1,560 |
| 10/10/2017 | Detection | 6.70 | 277 | 345 | 0.1 J | 7.2 | 432 | 1,490 |
| 12/27/2017 | Detection | 6.31 | 271 | 315 | -- | 7.1 | -- | 1,360 |
| 4/11/2018 | Assessment | 6.81 | 272 | 324 | 0.15 | 6.9 | 488 | 1,390 |
| 8/21/2018 | Assessment | 6.97 | 279 | 323 | 0.14 | 7.2 | 465 | 1,540 |
| 5/1/2019 | Assessment | 8.73 | 287 | 328 | 0.13 | 8.5 | 429 | 1,480 |
| 6/11/2019 | Assessment | 8.37 | 273 | 311 | 0.13 | 7.8 | 432 | 1,410 |
| 10/22/2019 | Assessment | 8.02 | 273 | 297 | 0.15 | 7.3 | 468 | 1,420 |
| 3/18/2020 | Assessment | -- | -- | -- | 0.13 | 7.3 | -- | -- |
| 5/5/2020 | Assessment | 10.6 | 262 | 331 | 0.10 | 7.4 | 402 | 1,390 |

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

--: Not analyzed

Table 1 - Groundwater Data Summary: MW-1509

Mitchell - BAP
Appendix IV Constituents

| Collection Date | Monitoring Program | Antimony | Arsenic | Barium | Beryllium | Cadmium | Chromium | Cobalt | Combined Radium | Fluoride | Lead | Lithium | Mercury | Molybdenum | Selenium | Thallium |
|-----------------|--------------------|----------|---------|--------|-----------|----------|----------|--------|-----------------|----------|---------|-----------|-----------|------------|----------|----------|
| | | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L |
| 6/14/2016 | Background | 0.03 J | 0.55 | 64.4 | 0.008 J | 0.03 | 2.5 | 0.514 | 0.816 | 0.16 | 0.102 | 0.0009 J | < 0.002 U | 1.43 | 0.1 | 0.03 J |
| 8/9/2016 | Background | 0.03 J | 0.62 | 64.4 | 0.01 J | 0.02 | 0.5 | 0.484 | 0.45569 | 0.16 | 0.251 | 0.015 | < 0.002 U | 1.00 | 0.1 | 0.03 J |
| 9/27/2016 | Background | 0.03 J | 0.39 | 61.0 | < 0.005 U | 0.02 | 4.6 | 0.424 | 2.664 | 0.1 J | 0.024 | 0.018 | < 0.002 U | 1.07 | 0.2 | 0.04 J |
| 11/8/2016 | Background | 0.03 J | 0.40 | 62.0 | < 0.005 U | 0.02 | 0.627 | 0.253 | 0.413 | 0.1 J | 0.006 J | 0.012 | < 0.002 U | 0.59 | 0.1 | 0.05 J |
| 2/7/2017 | Background | 0.03 J | 0.50 | 56.7 | < 0.005 U | 0.02 | 0.650 | 0.130 | 1.399 | 0.15 | 0.056 | 0.011 | < 0.002 U | 0.66 | 0.09 J | 0.04 J |
| 4/5/2017 | Background | 0.02 J | 0.33 | 63.5 | < 0.005 U | 0.02 J | 1.15 | 0.189 | 0.304 | 0.1 J | 0.01 J | 0.012 | < 0.002 U | 0.48 | 0.2 | 0.03 J |
| 5/17/2017 | Background | 0.02 J | 0.56 | 61.5 | < 0.004 U | 0.01 J | 1.05 | 0.255 | 1.673 | 0.1 J | 0.02 J | 0.022 | 0.002 J | 0.56 | 0.2 | 0.03 J |
| 7/19/2017 | Background | 0.03 J | 0.65 | 58.5 | 0.01 J | 0.01 J | 0.857 | 0.344 | 1.134 | 0.1 J | 0.220 | 0.017 | < 0.002 U | 0.80 | 0.2 J | 0.04 J |
| 4/11/2018 | Assessment | 0.03 J | 0.42 | 52.8 | 0.005 J | 0.01 J | 0.657 | 0.215 | 0.792 | 0.15 | 0.062 | 0.009 | 0.002 J | 0.34 | 0.2 | 0.057 |
| 8/21/2018 | Assessment | 0.09 | 0.33 | 53.8 | < 0.004 U | 0.008 J | 0.777 | 0.132 | 0.736 | 0.14 | 0.035 | 0.012 | < 0.002 U | 0.32 | 0.3 | 0.03 J |
| 5/1/2019 | Assessment | 0.03 J | 0.33 | 47.2 | < 0.02 U | 0.01 J | 2.28 | 0.324 | 0.4075 | 0.13 | 0.114 | < 0.009 U | < 0.002 U | < 0.4 U | 0.2 J | < 0.1 U |
| 6/11/2019 | Assessment | 0.03 J | 0.28 | 48.6 | < 0.02 U | 0.02 J | 1.47 | 0.097 | 0.559 | 0.13 | 0.05 J | 0.02 J | < 0.002 U | < 0.4 U | 0.2 | < 0.1 U |
| 10/22/2019 | Assessment | 0.03 J | 0.37 | 47.2 | < 0.02 U | 0.01 J | 1.22 | 0.164 | 1.441 | 0.15 | 0.08 J | 0.00911 | < 0.002 U | < 0.4 U | 0.3 | < 0.1 U |
| 3/18/2020 | Assessment | < 0.02 U | 0.42 | 45.8 | < 0.02 U | < 0.01 U | 0.518 | 0.144 | 0.5514 | 0.13 | 0.2 J | 0.00934 | < 0.002 U | < 0.4 U | 0.07 J | < 0.1 U |
| 5/5/2020 | Assessment | 0.03 J | 0.27 | 43.7 | < 0.02 U | < 0.01 U | 0.633 | 0.092 | 1.2019 | 0.10 | 0.05 J | 0.00897 | < 0.002 U | 0.6 J | 0.1 J | < 0.1 U |

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-1510

Mitchell - BAP

Appendix III Constituents

| Collection Date | Monitoring Program | Boron | Calcium | Chloride | Fluoride | pH | Sulfate | Total Dissolved Solids |
|-----------------|--------------------|-------|---------|----------|----------|-----|---------|------------------------|
| | | mg/L | mg/L | mg/L | mg/L | SU | mg/L | mg/L |
| 6/14/2016 | Background | 9.36 | 283 | 334 | 0.06 J | 7.0 | 358 | 1,520 |
| 8/2/2016 | Background | 9.18 | 294 | 333 | 0.06 J | 7.0 | 356 | 1,410 |
| 9/27/2016 | Background | 10.1 | 296 | 338 | 0.05 J | 7.1 | 367 | 1,410 |
| 11/9/2016 | Background | 9.22 | 280 | 325 | < 0.05 U | 7.1 | 332 | 1,420 |
| 2/8/2017 | Background | 10.4 | 281 | 314 | 0.06 J | 7.2 | 325 | 1,270 |
| 4/5/2017 | Background | 9.23 | 261 | 303 | 0.06 J | 7.3 | 313 | 1,330 |
| 5/17/2017 | Background | 10.8 | 249 | 306 | 0.05 J | 7.2 | 307 | 1,340 |
| 7/18/2017 | Background | 9.86 | 255 | 311 | < 0.05 U | 7.2 | 309 | 1,410 |
| 10/9/2017 | Detection | 8.70 | 249 | 327 | 0.05 J | 7.2 | 356 | 1,520 |
| 12/27/2017 | Detection | 8.83 | 261 | 339 | -- | 7.2 | -- | 1,300 |
| 4/12/2018 | Assessment | 10.4 | 292 | 322 | < 0.05 U | 7.0 | 398 | 1,290 |
| 8/21/2018 | Assessment | 9.13 | 268 | 334 | 0.09 | 7.3 | 428 | 1,550 |
| 5/1/2019 | Assessment | 8.83 | 287 | 325 | 0.10 | 8.1 | 467 | 1,460 |
| 6/12/2019 | Assessment | 8.50 | 266 | 293 | 0.10 | 6.9 | 469 | 1,430 |
| 10/22/2019 | Assessment | 9.30 | 259 | 283 | 0.11 | 7.2 | 483 | 1,360 |
| 3/18/2020 | Assessment | -- | -- | -- | 0.11 | 7.4 | -- | -- |
| 5/6/2020 | Assessment | 9.14 | 228 | 252 | 0.10 | 7.4 | 484 | 1,440 |

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

--: Not analyzed

Table 1 - Groundwater Data Summary: MW-1510

Mitchell - BAP
Appendix IV Constituents

| Collection Date | Monitoring Program | Antimony | Arsenic | Barium | Beryllium | Cadmium | Chromium | Cobalt | Combined Radium | Fluoride | Lead | Lithium | Mercury | Molybdenum | Selenium | Thallium |
|-----------------|--------------------|----------|---------|--------|-----------|----------|----------|--------|-----------------|----------|--------|---------|-----------|------------|----------|----------|
| | | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | µg/L | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L |
| 6/14/2016 | Background | 0.03 J | 0.72 | 50.8 | 0.02 J | 0.01 J | 0.6 | 0.257 | 0.331 | 0.06 J | 0.282 | 0.003 | < 0.002 U | 0.65 | 0.2 | 0.057 |
| 8/2/2016 | Background | 0.03 J | 0.62 | 49.0 | 0.02 J | 0.009 J | 0.7 | 0.256 | 1.383 | 0.06 J | 0.269 | 0.016 | < 0.002 U | 0.92 | 0.2 | 0.02 J |
| 9/27/2016 | Background | 0.03 J | 0.70 | 48.7 | 0.02 J | 0.009 J | 0.8 | 0.329 | 0.865 | 0.05 J | 0.333 | 0.014 | < 0.002 U | 0.45 | 0.2 | 0.04 J |
| 11/9/2016 | Background | 0.02 J | 0.58 | 44.6 | 0.02 J | 0.01 J | 0.655 | 0.230 | 0.88 | < 0.05 U | 0.261 | 0.009 | < 0.002 U | 0.33 | 0.1 | 0.03 J |
| 2/8/2017 | Background | 0.02 J | 0.47 | 39.5 | < 0.005 U | 0.005 J | 0.521 | 0.073 | 6.828 | 0.06 J | 0.066 | 0.013 | < 0.002 U | 0.42 | 0.08 J | 0.02 J |
| 4/5/2017 | Background | 0.02 J | 0.36 | 41.4 | < 0.005 U | 0.006 J | 2.34 | 0.175 | 1.12829 | 0.06 J | 0.094 | 0.011 | < 0.002 U | 0.27 | 0.07 J | < 0.01 U |
| 5/17/2017 | Background | 0.02 J | 0.53 | 40.2 | < 0.004 U | 0.005 J | 1.40 | 0.138 | 0.176 | 0.05 J | 0.049 | 0.015 | < 0.002 U | 0.28 | 0.1 | 0.01 J |
| 7/18/2017 | Background | 0.02 J | 0.51 | 41.0 | 0.007 J | 0.008 J | 6.41 | 0.234 | 0.97 | < 0.05 U | 0.125 | 0.014 | < 0.002 U | 0.85 | 0.1 | 0.01 J |
| 4/12/2018 | Assessment | 0.03 J | 0.42 | 43.3 | 0.01 J | 0.005 J | 27.4 | 0.217 | 0.094 | < 0.05 U | 0.119 | 0.006 | 0.002 J | 3.30 | 0.1 | 0.02 J |
| 8/21/2018 | Assessment | 0.03 J | 0.37 | 42.6 | 0.008 J | 0.006 J | 5.64 | 0.383 | 1.237 | 0.09 | 0.133 | 0.011 | < 0.002 U | 0.43 | 0.1 | 0.01 J |
| 5/1/2019 | Assessment | 0.02 J | 0.29 | 41.7 | < 0.02 U | < 0.01 U | 1.75 | 0.172 | 0.5725 | 0.10 | 0.105 | 0.01 J | < 0.002 U | < 0.4 U | 0.2 J | < 0.1 U |
| 6/12/2019 | Assessment | 0.02 J | 0.27 | 41.3 | < 0.02 U | < 0.01 U | 0.697 | 0.105 | 0.4098 | 0.10 | 0.07 J | 0.02 J | < 0.002 U | < 0.4 U | 0.2 J | < 0.1 U |
| 10/22/2019 | Assessment | 0.02 J | 0.33 | 38.7 | < 0.02 U | < 0.01 U | 1.12 | 0.154 | 0.333 | 0.11 | 0.07 J | 0.00862 | < 0.002 U | < 0.4 U | 0.2 | < 0.1 U |
| 3/18/2020 | Assessment | < 0.02 U | 0.31 | 38.0 | < 0.02 U | < 0.01 U | 2.10 | 0.121 | 0.864 | 0.11 | 0.08 J | 0.00808 | < 0.002 U | < 0.4 U | 0.2 J | < 0.1 U |
| 5/6/2020 | Assessment | < 0.02 U | 0.29 | 36.7 | < 0.02 U | < 0.01 U | 0.886 | 0.109 | 0.7374 | 0.10 | 0.07 J | 0.00750 | < 0.002 U | < 0.4 U | 0.2 J | < 0.1 U |

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

**Table 1: Residence Time Calculation Summary
Mitchell Bottom Ash Ponds**

| CCR Management Unit | Monitoring Well | Well Diameter (inches) | 2020-03 | | 2020-05 | | 2020-10 | |
|---------------------|------------------------|------------------------|--------------------------------|-----------------------------------|--------------------------------|-----------------------------------|--------------------------------|-----------------------------------|
| | | | Groundwater Velocity (ft/year) | Groundwater Residence Time (days) | Groundwater Velocity (ft/year) | Groundwater Residence Time (days) | Groundwater Velocity (ft/year) | Groundwater Residence Time (days) |
| Bottom Ash Pond | MW-1504 ^[1] | 2.0 | 2.4 | 25.6 | 6.6 | 9.2 | 18.1 | 3.4 |
| | MW-1505 ^[2] | 2.0 | 4.3 | 14.1 | 7.3 | 8.4 | 19.5 | 3.1 |
| | MW-1506 ^[2] | 2.0 | 4.1 | 14.7 | 6.5 | 9.4 | 3.9 | 15.6 |
| | MW-1507 ^[2] | 2.0 | 5.4 | 11.3 | 12.6 | 4.8 | 9.8 | 6.2 |
| | MW-1508 ^[3] | 2.0 | 21.0 | 2.9 | 23.4 | 2.6 | 17.7 | 3.4 |
| | MW-1509 ^[2] | 2.0 | 9.2 | 6.6 | 14.5 | 4.2 | 12.8 | 4.8 |
| | MW-1510 ^[1] | 2.0 | 22.3 | 2.7 | 19.1 | 3.2 | 15.6 | 3.9 |

Notes:

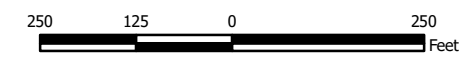
- [1] - Sidegradient Well
- [2] - Downgradient Well
- [3] - Upgradient Well



- Monitoring Well Network**
- ◆ Compliance Sampling Location
 - ◆ Upgradient Sampling Location
 - Bottom Ash Pond

Notes

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



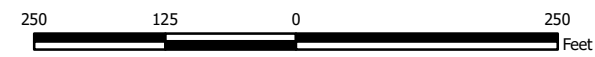
| | | |
|-------------------------------------------------------------------------------------|------------|---------------------|
| Site Layout Bottom Ash Pond | | Figure 1 |
| Mitchell Power Generation Plant - Bottom Ash Pond Marshall County, West Virginia | | |
| Geosyntec consultants | | |
| Columbus, Ohio | 2018/01/26 | |



- Legend**
- ⊕ Groundwater Monitoring Well
 - ➔ Groundwater Flow Direction
 - Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on October 22, 2019) provided by AEP.
- Site features based on information available in the Groundwater Monitoring Network Evaluation (CEC, 2016) provided by AEP.
- Groundwater and river elevation units are feet above mean sea level (NAVD 88).



**Potentiometric Surface Map - Uppermost Aquifer
October 2019**

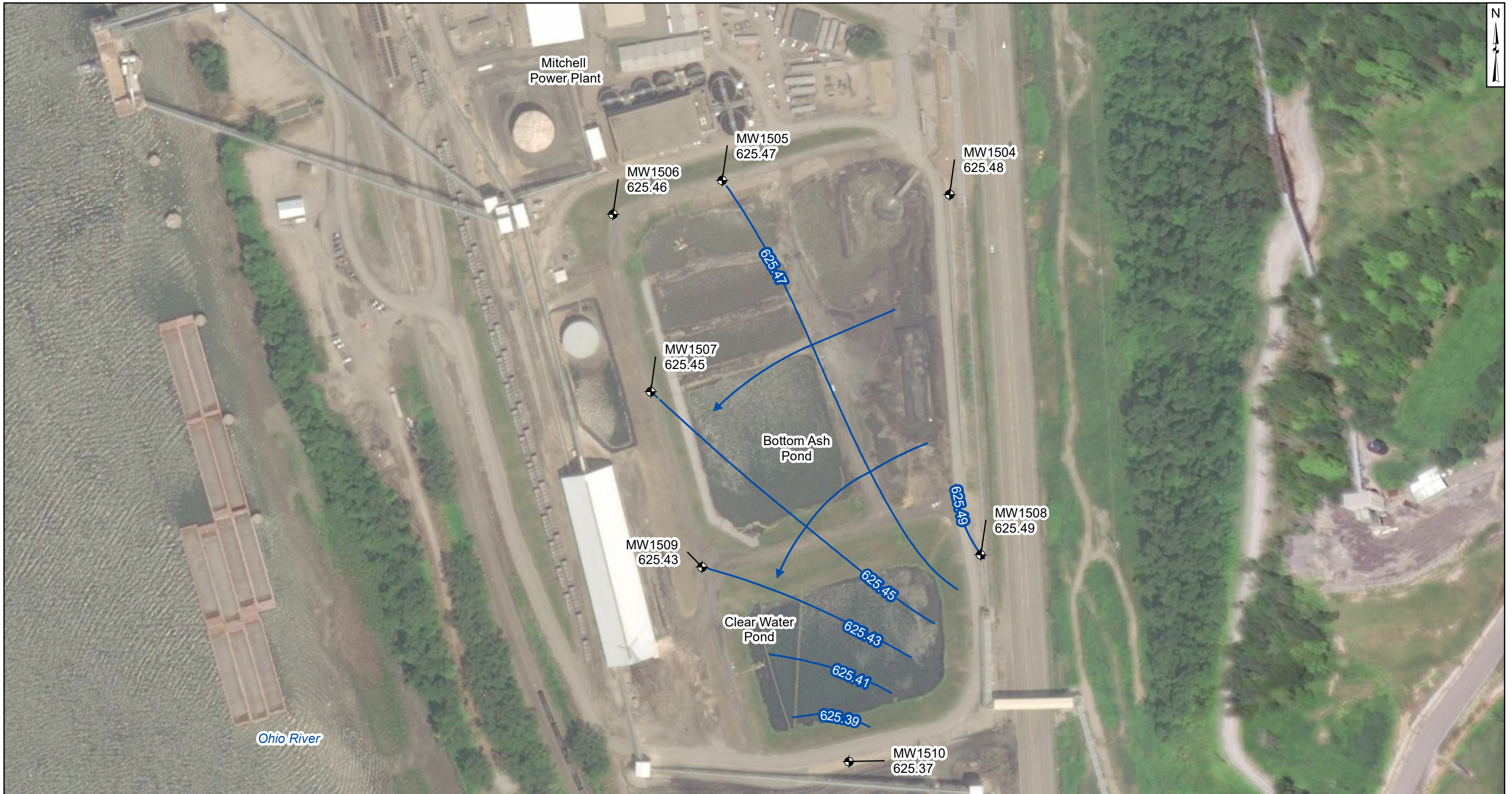
Mitchell Power Generation Plant - Bottom Ash Pond
Marshall County, West Virginia

Geosyntec
consultants

Figure
2

Columbus, Ohio

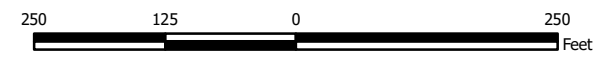
2019/12/11



- Legend**
- ⊕ Groundwater Monitoring Well
 - ➔ Groundwater Flow Direction
 - Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on March 17, 2020) provided by AEP.
- Approximate Ohio River elevation was 602.40 feet at Mitchell Power Plant on March 17, 2020. Data Source: USGS Ohio River gauge at Hannibal Lock and Dan (Upper), OH.
- Site features based on information available in the Groundwater Monitoring Network Evaluation (CEC, 2016) provided by AEP.
- Groundwater and river elevation units are feet above mean sea level (NAVD 88).



**Potentiometric Surface Map - Uppermost Aquifer
March 2020**

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

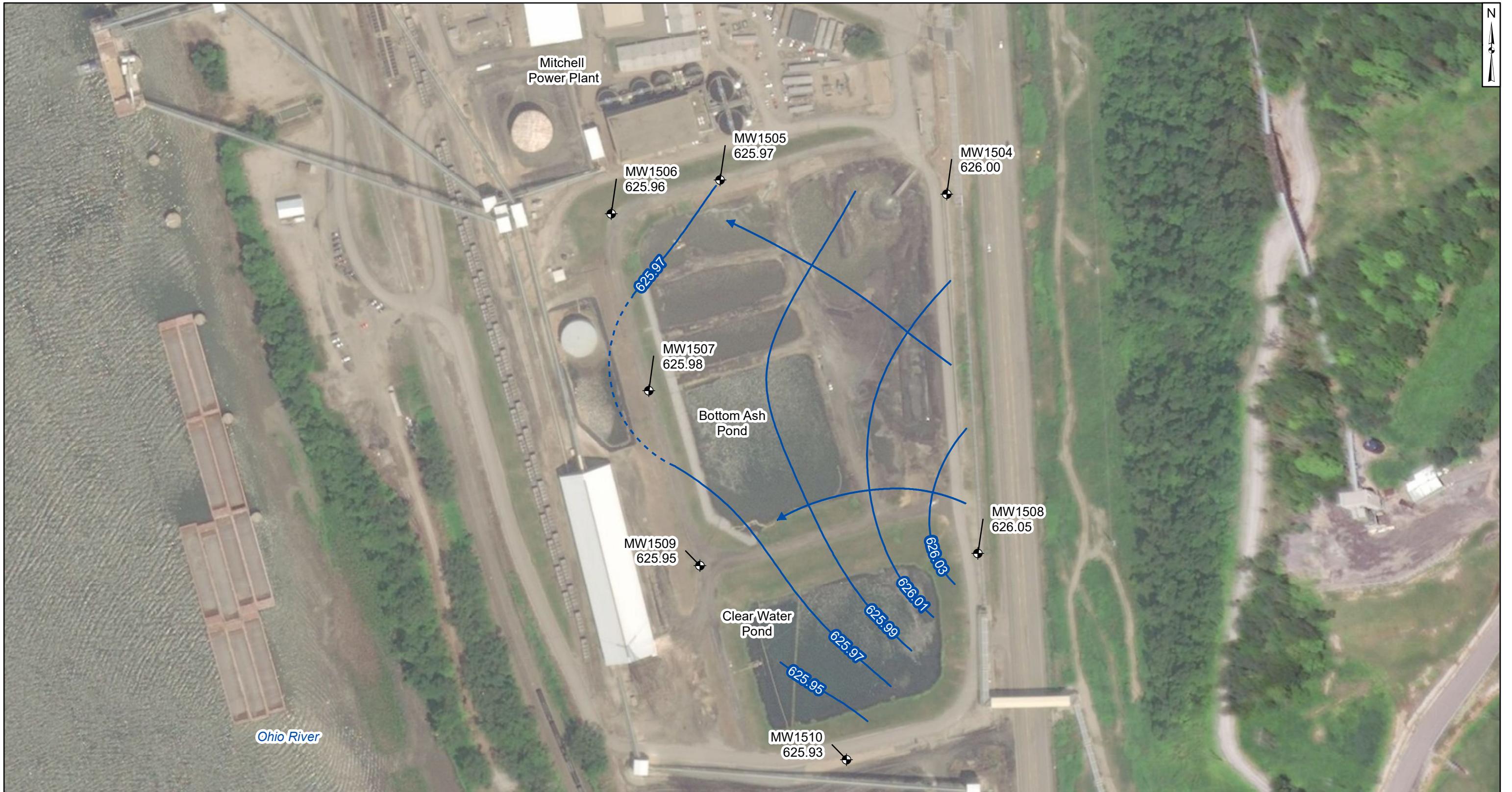
Geosyntec
consultants

Figure

3

Columbus, Ohio

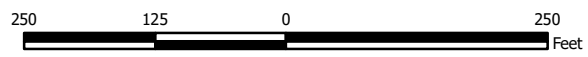
2020/06/10



- Legend**
- ⊕ Groundwater Monitoring Well
 - Groundwater Flow Direction
 - Groundwater Elevation Contour
 - - - Groundwater Elevation Contour (Inferred)

Notes

- Monitoring well coordinates and water level data (collected on May 5 - 6, 2020) provided by AEP.
- Approximate Ohio River elevation was 602.37 feet at Mitchell Power Plant on May 5, 2020. Data Source: USGS Ohio River gauge at Hannibal Lock and Dan (Upper), OH.
- Site features based on information available in the Groundwater Monitoring Network Evaluation (CEC, 2016) provided by AEP.
- Groundwater and river elevation units are feet above mean sea level (NAVD 88).



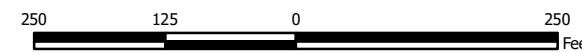
| | |
|-------------------------------------------------------------------------------------|------------|
| Potentiometric Surface Map - Uppermost Aquifer May 2020 | |
| Mitchell Power Generation Plant - Bottom Ash Pond Marshall County, West Virginia | |
| Geosyntec consultants | |
| Columbus, Ohio | 2020/06/10 |
| Figure 4 | |



- Legend**
- Groundwater Monitoring Well
 - Groundwater Flow Direction
 - Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on October 20, 2020) provided by AEP.
- Approximate Ohio River elevation was 623.57 feet at Mitchell Power Plant on October 20, 2020. Data Source: USGS Ohio River gauge at Hannibal Lock and Dan (Upper), OH.
- Site features based on information available in the Groundwater Monitoring Network Evaluation (CEC, 2016) provided by AEP.
- Groundwater and river elevation units are feet above mean sea level (NAVD 88).



**Potentiometric Surface Map - Uppermost Aquifer
October 2020**

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

Geosyntec
consultants

Figure

5

Columbus, Ohio

2021/01/14

APPENDIX 2 - Statistical Analyses

The February and August 2020 statistical analysis summaries concluding that no SSLs were identified at the CCR unit follow.

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

Submitted to



1 Riverside Plaza
Columbus, Ohio 43215-2372

Submitted by



engineers | scientists | innovators

941 Chatham Lane
Suite 103
Columbus, Ohio 43221

February 11, 2020

CHA8473

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LIST OF ATTACHMENTS

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

LIST OF ACRONYMS AND ABBREVIATIONS

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

SECTION 1

EXECUTIVE SUMMARY

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

Based on detection monitoring conducted in 2017 and 2018, statistically significant increases (SSIs) over background were concluded for boron, calcium, chloride, and total dissolved solids (TDS), at the BAP. An alternative source was not identified following the detection monitoring events; thus, the BAP has been in assessment monitoring since 2018. During the most recent assessment monitoring event, completed in May 2019, Appendix III exceedances of boron, calcium, chloride, pH, sulfate, and TDS were observed, and the unit remained in assessment monitoring. The statistical summary of the results of the May 2019 sampling event was issued in a separate report (Geosyntec, 2019). Two assessment monitoring events were conducted at the BAP in June 2019 and October 2019, in accordance with 40 CFR 257.95. Only the results of the June and October assessment events are documented in this report.

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

The monitoring data were submitted to Groundwater Stats Consulting, LLC for statistical analysis. Groundwater protection standards (GWPSs) were re-established for the Appendix IV parameters. Confidence intervals were calculated for Appendix IV parameters at the compliance wells to assess whether any were present at concentrations above the GWPSs. No statistically significant levels (SSLs) were identified. In addition, prediction limits were recalculated for Appendix III parameters. When compared to the revised prediction limits, concentrations for boron, calcium, chloride, fluoride, sulfate, and TDS remained above background. As a result, either the unit will remain in assessment monitoring or an alternative source demonstration (ASD) will be conducted to evaluate if the unit can return to detection monitoring. Certification of the selected statistical methods by a qualified professional engineer is documented in Attachment A.

SECTION 2

BOTTOM ASH POND EVALUATION

2.1 Data Validation & QA/QC

During the assessment monitoring program, two sets of samples were collected for analysis from each upgradient and downgradient well to meet the requirements of 40 CFR 257.95(b) (June 2019) and 257.95(d)(1) (October 2019). Samples from the June 2019 event and the October 2019 event were analyzed for all Appendix III and Appendix IV parameters. A summary of data collected during these assessment monitoring events may be found in Table 1.

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

The analytical data were imported into a Microsoft Access database, where checks were completed to assess the accuracy of sample location identification and analyte identification. Where necessary, unit conversions were applied to standardize reported units across all sampling events. Exported data files were created for use with the Sanitas™ v.9.6.23 statistics software. The export file was checked against the analytical data for transcription errors and completeness. No QA/QC issues were noted which would impact data usability.

2.2 Statistical Analysis

Statistical analyses for the BAP were conducted in accordance with the January 2017 *Statistical Analysis Plan* (AEP, 2017), except where noted below. Time series plots and results for all completed statistical tests are provided in Attachment B.

The data obtained in June and October 2019 were screened for potential outliers; however, no outliers were identified in either set of data (Attachment B).

2.2.1 Establishment of GWPSs

A GWPS was established for each Appendix IV parameter in accordance with 40 CFR 257.95(h) and the *Statistical Analysis Plan* (AEP, 2017). The established GWPS was determined to be the greater value of the background concentration and the maximum contaminant level (MCL) or risk-based level specified in 40 CFR 257.95(h)(2) for each Appendix IV parameter. To determine background concentrations, an upper tolerance limit (UTL) was calculated using pooled data from the background wells collected during the background monitoring and assessment monitoring events. Generally, tolerance limits were calculated parametrically with 95% coverage and 95% confidence. Non-parametric tolerance limits were calculated for beryllium, cadmium, fluoride,

mercury, selenium, and thallium due to apparent non-normal distributions. Tolerance limits and the final GWPSs are summarized in Table 2.

2.2.2 Evaluation of Potential Appendix IV SSLs

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

No SSLs were identified at the Mitchell BAP.

2.2.3 Establishment of Appendix III Prediction Limits

Upper prediction limits (UPL) were previously established for all Appendix III parameters following the background monitoring period (Geosyntec, 2018). Intrawell tests were used to evaluate potential SSIs for fluoride and sulfate, whereas interwell tests were used to evaluate potential SSIs for boron, calcium, chloride, pH, and TDS. While interwell prediction limits have been updated periodically during the assessment monitoring period as sufficient data became available, this represents the first update to the background dataset for parameters evaluated using intrawell tests.

Mann-Whitney (Wilcoxon rank-sum) tests were performed to determine whether the newer data are affected by a release from the BAP. Because the interwell Appendix III limits and the Appendix IV GWPSs are based on data from upgradient wells which would not be expected to have been impacted by a release, these tests were used for intrawell Appendix III tests only. Mann-Whitney tests were used to compare the medians of historical data (June 2016 - July 2017) to the new compliance samples (through May 2019) for fluoride and sulfate. Results were evaluated to determine if the medians of the two groups were similar at the 99% confidence level. Where no significant difference was found, the new compliance data were added to the background dataset. Where a statistically significant difference was found between the medians of the two groups, the data were reviewed to evaluate the cause of the difference and to determine if adding newer data to the background dataset, replacing the background dataset with the newer data, or continuing to use the existing background dataset was most appropriate. If the differences appeared to have been caused by a release, then the previous background dataset would have continued to be used.

The complete Mann-Whitney test results and a summary of the significant findings can be found in Appendix B. Two statistically significant differences were noted which included sulfate at MW-1506 and MW-1509. Typically, when the test concludes that the medians of the two groups are significantly different, the background data are not updated to include the newer data but will be reconsidered in the future. However, in both cases while the medians were slightly different, the recent reported measurements are similar to historical measurements. Therefore, the background data were updated along with all other records.

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

UPLs were updated using all the historical data through May 2019 to represent background values. Lower prediction limits (LPLs) were also updated for pH. The updated prediction limits are summarized in Table 3. Intrawell tests were used to evaluate potential SSIs for fluoride and sulfate, whereas interwell tests were used to evaluate potential SSIs for boron, calcium, chloride, pH, and TDS. The UPLs were calculated for a one-of-two retesting procedure; i.e., if at least one sample in a series of two does not exceed the UPL, then it can be concluded that an SSI has not occurred. In practice, where the initial result does not exceed the UPL, a second sample will not be collected. The retesting procedures achieved an acceptably high statistical power to detect changes at downgradient wells for constituents evaluated using both interwell and intrawell prediction limits.

2.2.4 Evaluation of Potential Appendix III SSIs

The CCR rule allows CCR units to move from assessment monitoring to detection monitoring if all Appendix III and Appendix IV parameters were at or below background levels for two consecutive sampling events [40 CFR 257.95(e)]. Since no Appendix IV SSLs were identified, Appendix III results were analyzed to assess whether concentrations of Appendix III parameters at the compliance wells exceeded background concentrations.

Data collected during the June 2019 and October 2019 assessment monitoring events from each compliance well were compared to the prediction limits to assess whether the results are above background values. The results from these events and the prediction limits are summarized in Table 4. The following exceedances of the upper prediction limits (UPLs) were noted:

- Boron concentrations exceeded the interwell UPL of 1.36 mg/L at MW-1505 (7.79 mg/L and 7.37 mg/L), MW-1506 (5.27 mg/L and 4.49 mg/L), MW-1507 (8.41 mg/L and 8.39 mg/L), MW-1509 (8.37 mg/L and 8.02 mg/L), and MW-1510 (8.50 mg/L and 9.30 mg/L).
- Calcium concentrations exceeded the interwell UPL of 242 mg/L at MW-1505 (279 mg/L and 285 mg/L), MW-1506 (265 mg/L and 293 mg/L), MW-1507 (257 mg/L and 273 mg/L), MW-1509 (273 mg/L and 273 mg/L), and MW-1510 (266 mg/L and 259 mg/L).

- Chloride concentrations exceeded the interwell UPL of 238 mg/L at MW-1505 (261 mg/L and 260 mg/L), MW-1506 (315 mg/L and 364 mg/L), MW-1507 (279 mg/L and 295 mg/L), MW-1509 (311 mg/L and 297 mg/L), and MW-1510 (293 mg/L and 283 mg/L).
- Fluoride concentrations exceeded the intrawell UPL of 0.10 mg/L at MW-1510 (0.11 mg/L).
- Sulfate concentrations exceeded the intrawell UPL of 408 mg/L at MW-1505 (455 mg/L).
- TDS concentrations exceeded the interwell UPL of 1194 mg/L at MW-1505 (1450 mg/L and 1480 mg/L), MW-1506 (1370 mg/L and 1330 mg/L), MW-1507 (1340 mg/L and 1360 mg/L), MW-1509 (1410 mg/L and 1420 mg/L), and MW-1510 (1430 mg/L and 1360 mg/L).

Based on these results, concentrations of Appendix III parameters exceeded background levels at compliance wells at the Mitchell BAP during assessment monitoring. As a result, the Mitchell BAP CCR unit will remain in assessment monitoring.

2.3 Conclusions

A semi-annual assessment monitoring event was conducted in accordance with the CCR Rule. The laboratory and field data were reviewed prior to statistical analysis, with no QA/QC issues identified that impacted data usability. GWPSs were re-established for the Appendix IV parameters. A confidence interval was constructed at each compliance well for each Appendix IV parameter; SSLs were concluded if the entire confidence interval exceeded the GWPSs. No SSLs were identified.

Revised prediction limits were calculated for Appendix III parameters. Interwell tests were used to evaluate potential SSIs for boron, calcium, chloride, pH, and TDS, whereas intrawell tests were used to evaluate potential SSIs for fluoride and sulfate. Prediction limits were recalculated using a one-of-two retesting procedure. The Appendix III results were evaluated to assess whether concentrations of Appendix III parameters exceeded background levels. Boron, calcium, chloride, fluoride, sulfate, and TDS results exceeded background levels at select downgradient wells.

Based on this evaluation, either the Mitchell BAP CCR unit will remain in assessment monitoring or an ASD will be conducted to evaluate if the unit can return to detection monitoring.

SECTION 3

REFERENCES

American Electric Power (AEP). 2017. Statistical Analysis Plan – Mitchell Plant. January 2017.

Geosyntec Consultants (Geosyntec). 2018. Statistical Analysis Summary – Bottom Ash Pond, Mitchell Plant, Moundsville, West Virginia. January 15, 2018.

Geosyntec, 2019. Statistical Analysis Summary – Bottom Ash Pond, Mitchell Plant, Moundsville, West Virginia. July 10, 2019.

TABLES

**Table 1 - Groundwater Data Summary
Mitchell - Bottom Ash Pond**

| Component | Unit | MW-1504 | | MW-1505 | | MW-1506 | | MW-1507 | | MW-1508 | | MW-1509 | | MW-1510 | |
|------------------------|-------|-----------|------------|-----------|------------|-----------|------------|-----------|------------|-----------|------------|-----------|------------|-----------|------------|
| | | 6/11/2019 | 10/22/2019 | 6/11/2019 | 10/22/2019 | 6/11/2019 | 10/22/2019 | 6/11/2019 | 10/22/2019 | 6/12/2019 | 10/22/2019 | 6/11/2019 | 10/22/2019 | 6/12/2019 | 10/22/2019 |
| Antimony | µg/L | 0.100 U | 0.0600 | 0.0300 J | 0.0300 | 0.0300 J | 0.0300 | 0.0300 J | 0.0300 | 0.100 U | 0.0500 | 0.0300 J | 0.0300 | 0.0200 J | 0.0200 |
| Arsenic | µg/L | 0.240 | 0.290 | 0.280 | 0.340 | 0.420 | 0.370 | 0.240 | 0.450 | 0.410 | 0.350 | 0.280 | 0.370 | 0.270 | 0.330 |
| Barium | µg/L | 33.5 | 37.0 | 49.3 | 49.9 | 49.8 | 52.7 | 52.2 | 54.8 | 35.2 | 34.8 | 48.6 | 47.2 | 41.3 | 38.7 |
| Beryllium | µg/L | 0.100 U | 0.100 U | 0.100 U | 0.100 U | 0.100 U | 0.100 U | 0.100 U | 0.100 U | 0.100 U | 0.100 U | 0.100 U | 0.100 U | 0.100 U | 0.100 U |
| Boron | mg/L | 0.040 J | 0.02 | 7.79 | 7.37 | 5.27 | 4.49 | 8.41 | 8.39 | 0.679 | 0.860 | 8.37 | 8.02 | 8.50 | 9.30 |
| Cadmium | µg/L | 0.0500 U | 0.0300 | 0.0300 J | 0.0300 | 0.0100 J | 0.0200 | 0.0300 J | 0.0300 | 0.0300 J | 0.0300 | 0.0200 J | 0.0100 | 0.0500 U | 0.0500 U |
| Calcium | mg/L | 183 | 196 | 279 | 285 | 265 | 293 | 257 | 273 | 209 | 212 | 273 | 273 | 266 | 259 |
| Chloride | mg/L | 78.5 | 85.9 | 261 | 260 | 315 | 364 | 279 | 295 | 163 | 168 | 311 | 297 | 293 | 283 |
| Chromium | µg/L | 0.0500 J | 0.399 | 0.849 | 0.450 | 1.11 | 0.708 | 0.315 | 1.51 | 0.590 | 1.20 | 1.47 | 1.22 | 0.697 | 1.12 |
| Cobalt | µg/L | 0.0400 J | 0.475 | 0.155 | 0.143 | 0.290 | 0.167 | 0.160 | 0.343 | 0.419 | 0.521 | 0.0970 | 0.164 | 0.105 | 0.154 |
| Combined Radium | pCi/L | 0.261 | 0.613 | 0.526 | 0.759 | 1.01 | 0.997 | 1.45 | 0.952 | 0.295 | 1.49 | 0.559 | 1.44 | 0.410 | 0.333 |
| Fluoride | mg/L | 0.170 | 0.150 | 0.0300 J | 0.0300 | 0.0500 J | 0.0400 | 0.0700 | 0.0800 | 0.0800 | 0.0900 | 0.130 | 0.150 | 0.100 | 0.110 |
| Lead | µg/L | 0.100 U | 0.200 U | 0.0400 J | 0.200 U | 0.234 | 0.100 | 0.100 U | 0.239 | 0.336 | 0.200 | 0.0500 J | 0.0800 | 0.0700 J | 0.0700 |
| Lithium | mg/L | 0.0300 U | 0.00448 | 0.0100 J | 0.00534 | 0.0300 U | 0.00873 | 0.0100 J | 0.00814 | 0.0300 U | 0.00485 | 0.0200 J | 0.00911 | 0.0200 J | 0.00862 |
| Mercury | mg/L | 0.00500 U | 0.00500 U | 0.00500 U | 0.00500 U | 0.00500 U | 0.00500 U | 0.00300 J | 0.00300 | 0.00500 U | 0.00500 U | 0.00500 U | 0.00500 U | 0.00500 U | 0.00500 U |
| Molybdenum | µg/L | 2.00 U | 2.00 U | 0.700 J | 2.00 U | 0.400 J | 2.00 | 0.400 J | 2.00 U | 2.00 U | 0.600 | 2.00 U | 2.00 U | 2.00 U | 2.00 U |
| Selenium | µg/L | 0.700 | 0.0500 | 0.400 | 0.100 | 0.0400 J | 0.0400 | 0.0400 J | 0.0800 | 0.200 | 0.300 | 0.200 | 0.300 | 0.200 J | 0.200 |
| Total Dissolved Solids | mg/L | 829 | 801 | 1450 | 1480 | 1370 | 1330 | 1340 | 1360 | 988 | 991 | 1410 | 1420 | 1430 | 1360 |
| Sulfate | mg/L | 261 | 242 | 404 | 455 | 335 | 354 | 349 | 369 | 285 | 309 | 432 | 468 | 469 | 483 |
| Thallium | µg/L | 0.500 U | 0.500 U | 0.500 U | 0.500 U | 0.500 U | 0.500 U | 0.500 U | 0.500 U | 0.500 U | 0.500 U | 0.500 U | 0.500 U | 0.500 U | 0.500 U |
| pH | SU | 7.60 | 7.30 | 7.70 | 7.20 | 7.80 | 7.40 | 7.80 | 7.40 | 7.10 | 7.30 | 7.80 | 7.30 | 6.90 | 7.20 |

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Parameter was not present in concentrations above the method detection limit and is reported as the reporting limit

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

**Table 2: Groundwater Protection Standards
Mitchell Plant - Bottom Ash Pond**

| Constituent Name | MCL | CCR Rule-Specified | Background Limit | GWPS |
|--------------------------------|-------|--------------------|------------------|-------|
| Antimony, Total (mg/L) | 0.006 | | 0.00005 | 0.006 |
| Arsenic, Total (mg/L) | 0.01 | | 0.0019 | 0.01 |
| Barium, Total (mg/L) | 2 | | 0.056 | 2 |
| Beryllium, Total (mg/L) | 0.004 | | 0.00006 | 0.004 |
| Cadmium, Total (mg/L) | 0.005 | | 0.00009 | 0.005 |
| Chromium, Total (mg/L) | 0.1 | | 0.0021 | 0.1 |
| Cobalt, Total (mg/L) | n/a | 0.006 | 0.0032 | 0.006 |
| Combined Radium, Total (pCi/L) | 5 | | 2.16 | 5 |
| Fluoride, Total (mg/L) | 4 | | 0.25 | 4 |
| Lead, Total (mg/L) | 0.015 | | 0.0034 | 0.015 |
| Lithium, Total (mg/L) | n/a | 0.04 | 0.014 | 0.04 |
| Mercury, Total (mg/L) | 0.002 | | 0.000008 | 0.002 |
| Molybdenum, Total (mg/L) | n/a | 0.1 | 0.0017 | 0.1 |
| Selenium, Total (mg/L) | 0.05 | | 0.0009 | 0.05 |
| Thallium, Total (mg/L) | 0.002 | | 0.0002 | 0.002 |

Notes:

Grey cell indicates calculated UTL is higher than MCL.

MCL = Maximum Contaminant Level

RSL = Regional Screening Level

GWPS = Groundwater Protection Standard

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

The higher of the calculated UTL or MCL/Rule-Specified Level is used as the GWPS.

Table 3: Revised Prediction Limits*Geosyntec Consultants, Inc.*

| Parameter | Units | Limit Type | MW-1504 | MW-1505 | MW-1506 | MW-1507 | MW-1508 | MW-1509 | MW-1510 | |
|------------------------|-------|------------|---------|---------|---------|---------|---------|---------|---------|--|
| Boron | mg/L | UPL | 1.36 | | | | | | | |
| Calcium | mg/L | UPL | 242 | | | | | | | |
| Chloride | mg/L | UPL | 238 | | | | | | | |
| Fluoride | mg/L | UPL | 0.275 | 0.03 | 0.1 | 0.09 | 0.1 | 0.17 | 0.1 | |
| pH | SU | UPL | 8.2 | | | | | | | |
| pH | SU | LPL | 6.9 | | | | | | | |
| Sulfate | mg/L | UPL | 461.7 | 408 | 369 | 373 | 325 | 489 | 497 | |
| Total Dissolved Solids | mg/L | UPL | 1194 | | | | | | | |

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

**Table 4: Appendix III Data Summary
Mitchell Plant - Bottom Ash Pond**

| Parameter | Units | Description | MW-1505 | | MW-1506 | | MW-1507 | | MW-1509 | | MW-1510 | |
|------------------------|-------|----------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| | | | 6/11/2019 | 10/22/2019 | 6/11/2019 | 10/22/2019 | 6/11/2019 | 10/22/2019 | 6/11/2019 | 10/22/2019 | 6/11/2019 | 10/22/2019 |
| Boron | mg/L | Interwell Background Value (UPL) | 1.36 | | | | | | | | | |
| | | Detection Monitoring Result | 7.79 | 7.37 | 5.27 | 4.49 | 8.41 | 8.39 | 8.37 | 8.02 | 8.50 | 9.30 |
| Calcium | mg/L | Interwell Background Value (UPL) | 242 | | | | | | | | | |
| | | Detection Monitoring Result | 279 | 285 | 265 | 293 | 257 | 273 | 273 | 273 | 266 | 259 |
| Chloride | mg/L | Interwell Background Value (UPL) | 238 | | | | | | | | | |
| | | Detection Monitoring Result | 261 | 260 | 315 | 364 | 279 | 295 | 311 | 297 | 293 | 283 |
| Fluoride | mg/L | Intrawell Background Value (UPL) | 0.03 | | 0.10 | | 0.09 | | 0.17 | | 0.10 | |
| | | Detection Monitoring Result | 0.03 J | 0.03 J | 0.05 J | 0.04 J | 0.07 | 0.08 | 0.13 | 0.15 | 0.10 | 0.11 |
| pH | SU | Interwell Background Value (UPL) | 8.2 | | | | | | | | | |
| | | Interwell Background Value (LPL) | 6.9 | | | | | | | | | |
| | | Detection Monitoring Result | 7.7 | 7.2 | 7.8 | 7.4 | 7.8 | 7.4 | 7.8 | 7.3 | 6.9 | 7.2 |
| Sulfate | mg/L | Intrawell Background Value (UPL) | 408 | | 369 | | 373 | | 489 | | 497 | |
| | | Detection Monitoring Result | 404 | 455 | 335 | 354 | 349 | 369 | 432 | 468 | 469 | 483 |
| Total Dissolved Solids | mg/L | Interwell Background Value (UPL) | 1194 | | | | | | | | | |
| | | Detection Monitoring Result | 1450 | 1480 | 1370 | 1330 | 1340 | 1360 | 1410 | 1420 | 1430 | 1360 |

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

Bold values exceed the background value.

Background values are shaded gray.

ATTACHMENT A

Certification by Qualified Professional Engineer

Certification by Qualified Professional Engineer

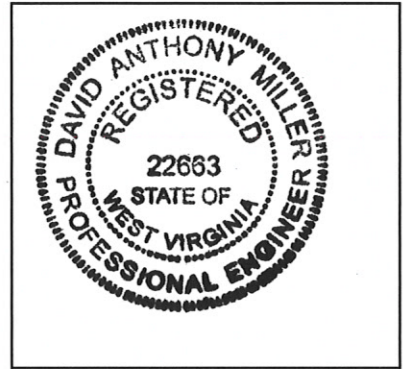
I certify that the selected and above described statistical method is appropriate for evaluating the groundwater monitoring data for the Mitchell Bottom Ash Pond CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER

Printed Name of Licensed Professional Engineer

David Anthony Miller

Signature



22663

License Number

WEST VIRGINIA

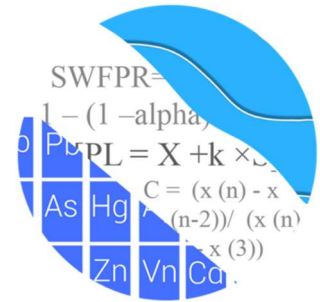
Licensing State

02.18.2020

Date

ATTACHMENT B
Statistical Analysis Output

GROUNDWATER STATS CONSULTING



January 10, 2020

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

RE: Mitchell Bottom Ash Pond (BAP) – Background Update & Assessment Report 2019

Dear Ms. Kreinberg,

Groundwater Stats Consulting, formerly the statistical consulting division of Sanitas Technologies, is pleased to provide the background update and evaluation of groundwater data for the Fall 2019 sample event for American Electric Power Company's Mitchell Bottom Ash Pond. The analysis complies with the federal rule for the Disposal of Coal Combustion Residuals from Electric Utilities (CCR Rule, 2015) as well as with the USEPA Unified Guidance (2009).

Sampling at each of the wells below began at Mitchell Bottom Ash Pond for the CCR program in 2016. The monitoring well network, as provided by Geosyntec Consultants, consists of the following: upgradient wells MW-1504 and MW-1508; and downgradient wells MW-1505, MW-1506, MW-1507, MW-1509 and MW-1510.

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

The CCR program consists of the following constituents:

- **Appendix III** (Detection Monitoring) - boron, calcium, chloride, fluoride, pH, sulfate, and TDS; and

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

Time series graphs and box plots for Appendix III and IV parameters are provided for all wells and constituents; and are used to evaluate concentrations over the entire record as well as view variation within and across wells (Figures A and B). All data were initially screened for outliers and trends in December 2017. As a result of that screening, the statistical methods implemented at this site are listed below:

Summary of Statistical Method:

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

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

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

Background Update – Appendix III Parameters – December 2019

Prior to updating background data, samples were re-evaluated for all wells for intrawell parameters and all upgradient wells for interwell parameters using Tukey's outlier test and visual screening with the May 2019 samples (Figure C). When values are identified as outliers, they are flagged in the database with "o" and are deselected prior to construction of statistical limits. Tukey's test identified a few new outliers during this screening, however, none of these values appeared to be in error or significantly different enough to warrant flagging. While Tukey's test did not identify the highest values for chromium and molybdenum in wells MW-1505 and MW-1510 (as a result of the natural log transformation), these values were significantly higher than the remaining measurements at these wells and did not appear to represent the populations at these wells. These values were flagged in the database. A list of all flagged outliers follows this letter. Additionally, flagged data are displayed in a lighter font and as a disconnected symbol on the time series reports, as well as in a lighter font on the accompanying data pages.

For constituents requiring intrawell prediction limits, the Mann-Whitney (Wilcoxon Rank Sum) test was used to compare the medians of historical data through July 2017 to the new compliance samples at each well through May 2019 to evaluate whether the groups are statistically different at the 99% confidence level, in which case background data may be updated with compliance data (Figure D). Two statistically significant differences were noted which included sulfate at wells MW_1506 and MW1509.

Typically, when the test concludes that the medians of the two groups are significantly different, particularly in the downgradient wells, the background are not updated to include the newer data but will be reconsidered in the future. However, in both cases while the medians were slightly different, the recent reported measurements are similar to historical measurements and, therefore, were updated at this time along with all other records. A summary of these results follows this letter and the test results are included with the Mann Whitney test section at the end of this report.

Intrawell prediction limits using all historical data through May 2019, combined with a 1-of-2 resample plan, were constructed for fluoride and sulfate (Figure E).

For parameters tested using interwell analyses, the Sen's Slope/Mann-Kendall trend test was used on upgradient wells to determine whether concentrations are statistically increasing, decreasing or stable (Figure F). No statistically significant increasing or decreasing trends were noted except for: chloride decreasing in upgradient well MW-1508 and pH increasing in upgradient well MW-1504.

The magnitude of these trends, however, is low relative to the average concentrations in these wells. Therefore, no adjustments were required at this time. A summary of these results is included with the trend tests.

Interwell prediction limits, combined with a 1-of-2 resample plan, were updated using all available data from upgradient wells through May 2019 for boron, calcium, chloride, pH, and TDS (Figure G). Interwell prediction limits pool upgradient well data to establish a background limit for an individual constituent. A summary table of the updated limits may be found following this letter in the Prediction Limit Summary Tables.

Evaluation of Appendix IV Parameters

Tolerance limits were used to calculate background limits from all available pooled upgradient well data for Appendix IV parameters with a target of 95% confidence and 95% coverage to determine the background level for each constituent (Figure H). Background data are screened for outliers and extreme trending patterns that would lead to artificially elevated statistical limits. Any flagged values may be seen on the Outlier Summary following this letter.

For parametric limits the target is 95% confidence and 95% coverage. The confidence and coverage levels for nonparametric tolerance limits are dependent upon the number of background samples. These limits were compared to the Maximum Contaminant Levels (MCLs) and CCR-Rule specified levels in the Groundwater Protection Standards (GWPS) table following this letter to determine the highest limit for use as the GWPS in the Confidence Interval comparisons (Figure I).

Confidence intervals were then constructed on downgradient wells for each of the Appendix IV parameters using the highest limit of the MCL, CCR-Rule specified levels, or background as discussed above (Figure J). Only when the entire confidence interval is above a GWPS is the well/constituent pair considered to exceed its respective standard. No exceedances were noted at any of the downgradient wells. A summary of the confidence interval results follows this letter.

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

For Groundwater Stats Consulting,

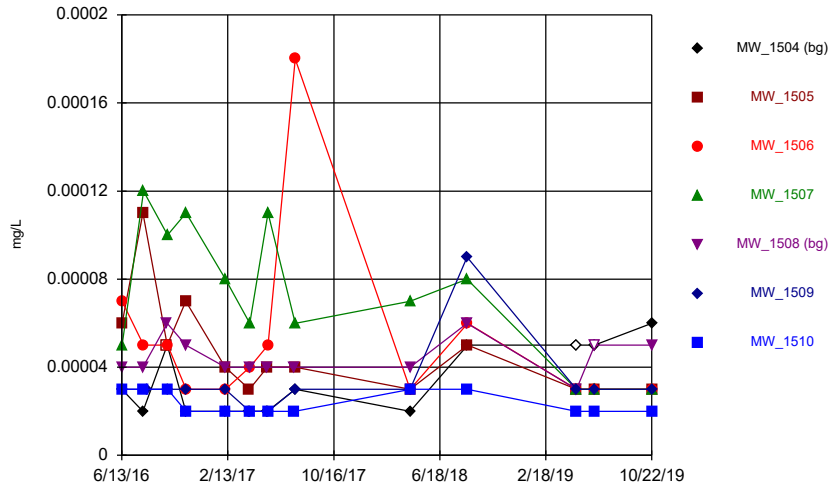
A handwritten signature in black ink, appearing to read "Easton Rayner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Easton Rayner
Groundwater Analyst

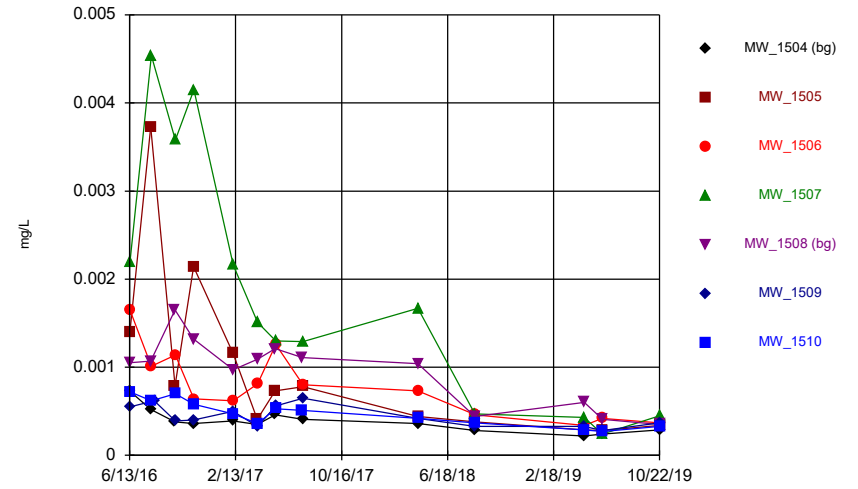
A handwritten signature in black ink, appearing to read "Kristina Rayner". The signature is cursive and elegant, with a long horizontal stroke extending to the right.

Kristina L. Rayner
Groundwater Statistician

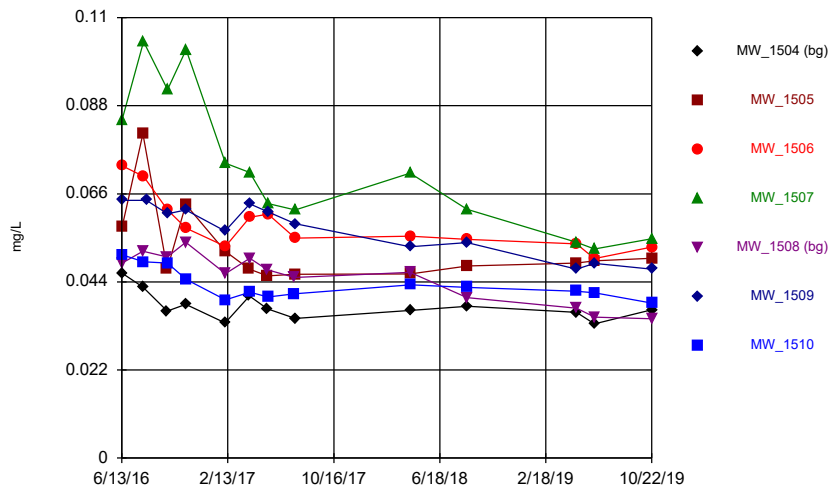
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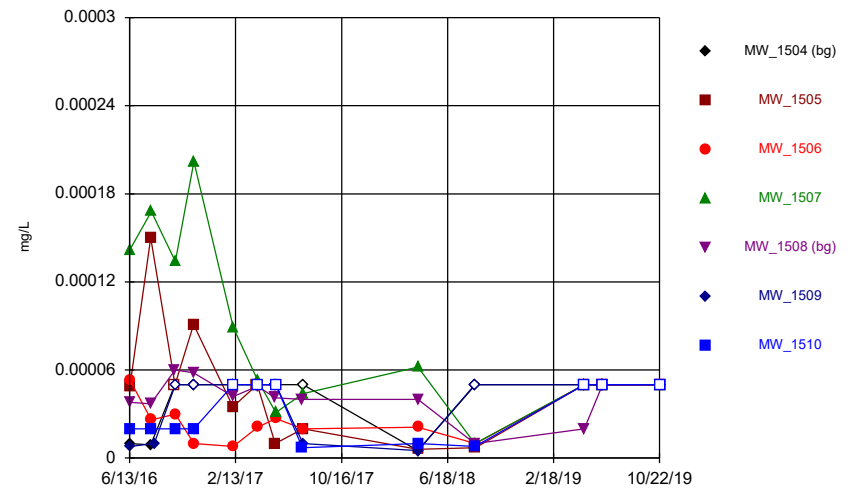
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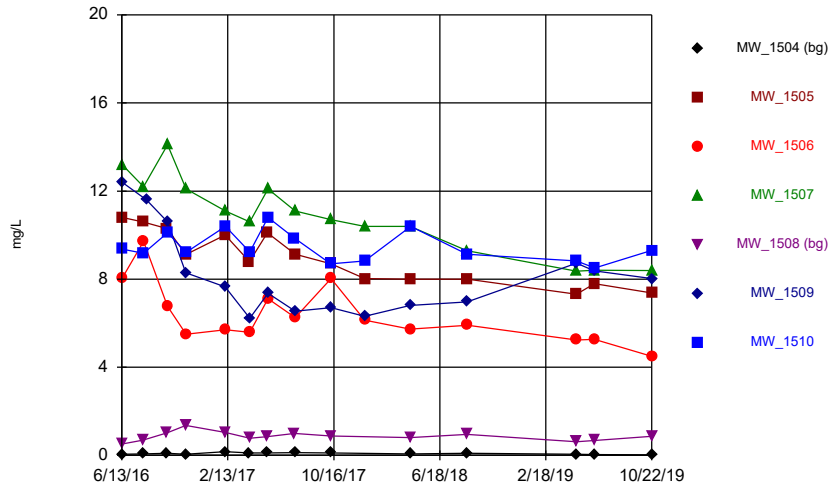
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Time Series



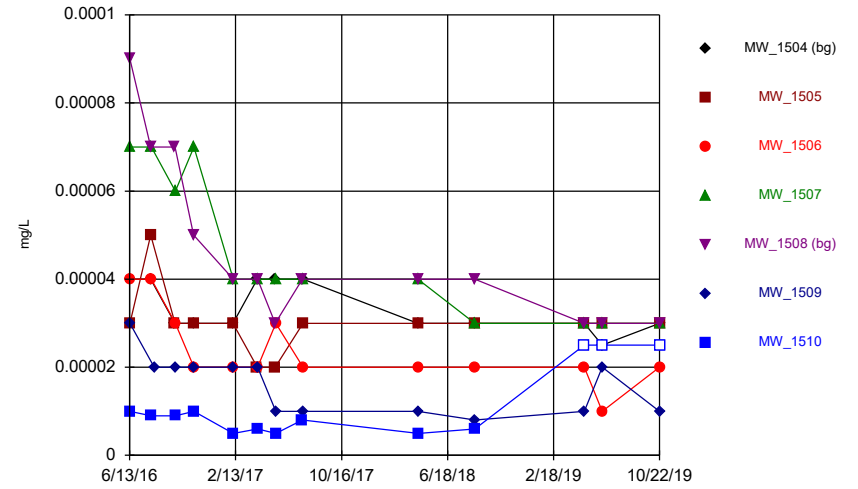
Time Series



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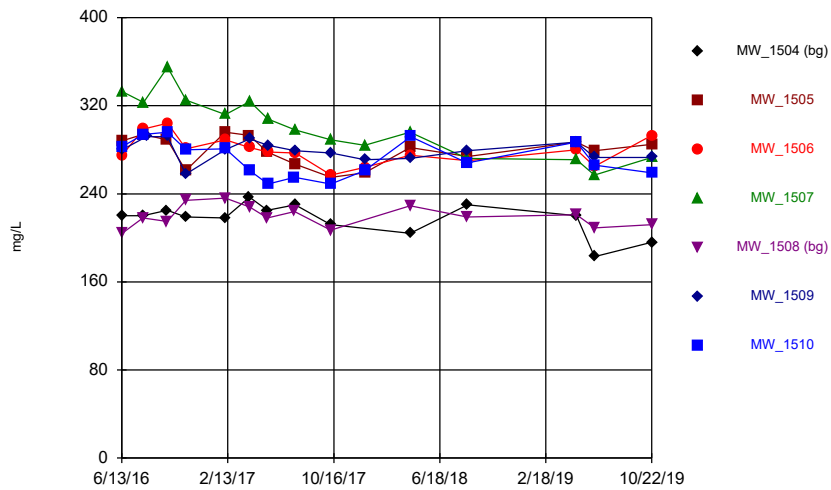
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Time Series



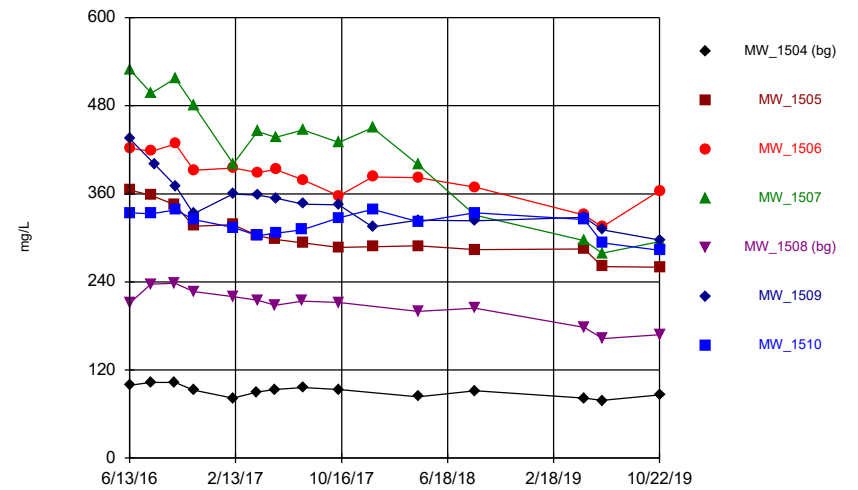
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Time Series



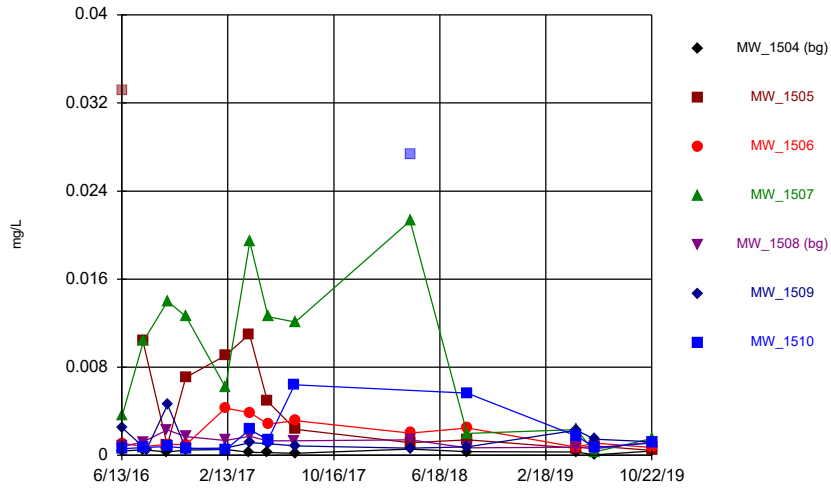
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Time Series



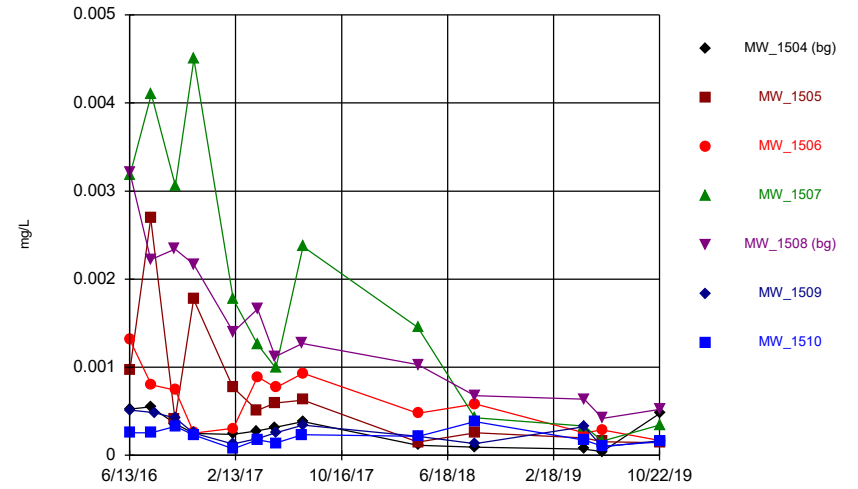
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Time Series



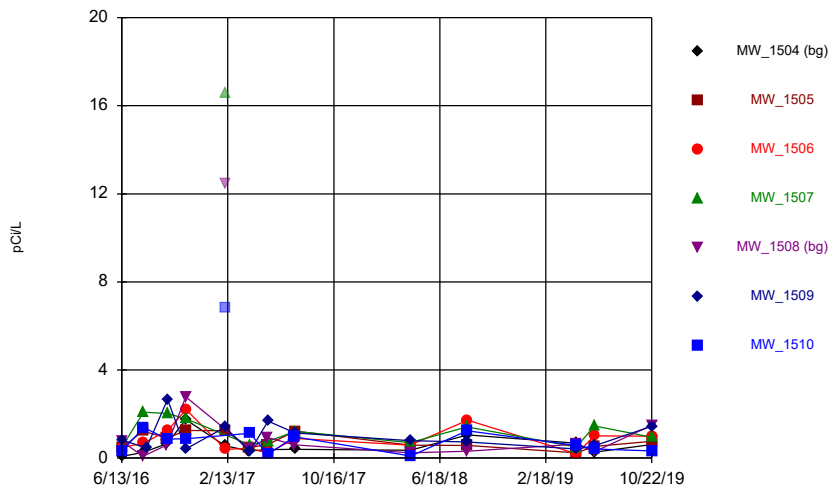
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Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Time Series



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Mitchell BAP Client: Geosyntec Data: Mitchell BAP

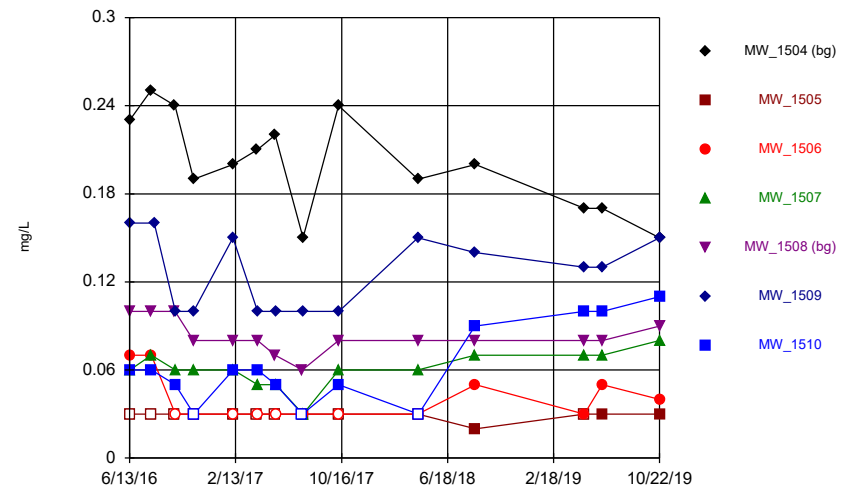
Time Series



Constituent: Combined Radium 226 + 228 Analysis Run 12/27/2019 9:59 AM View: All Data
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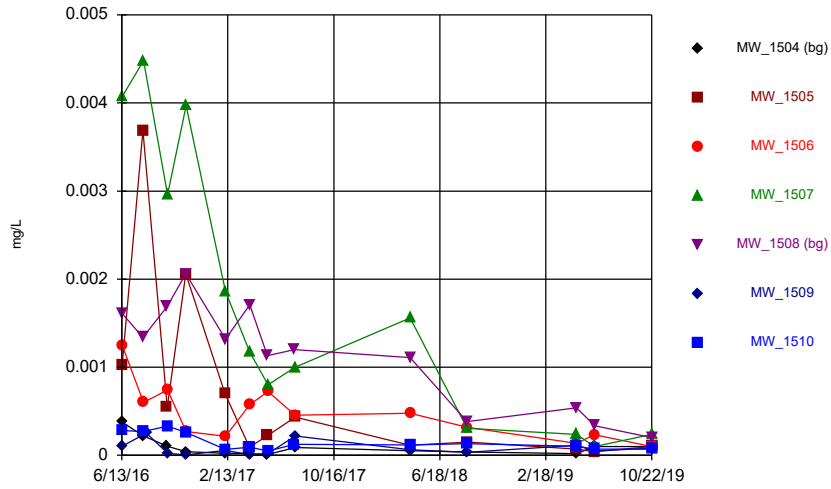
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Time Series



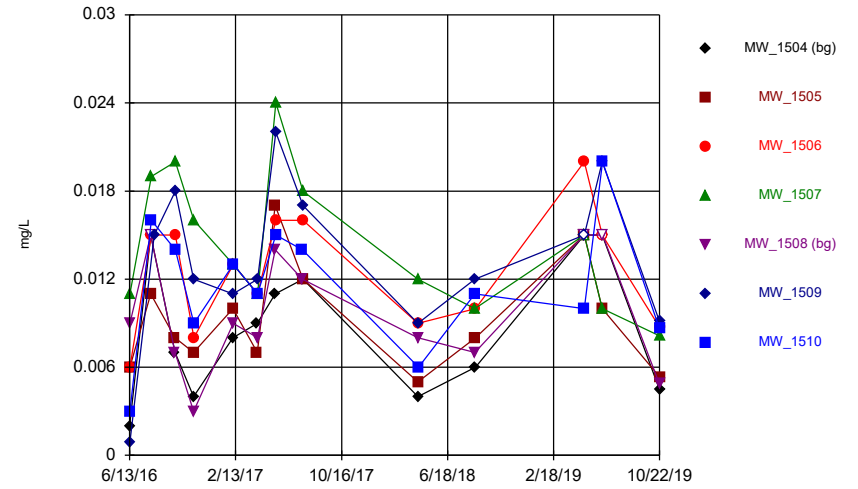
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Time Series



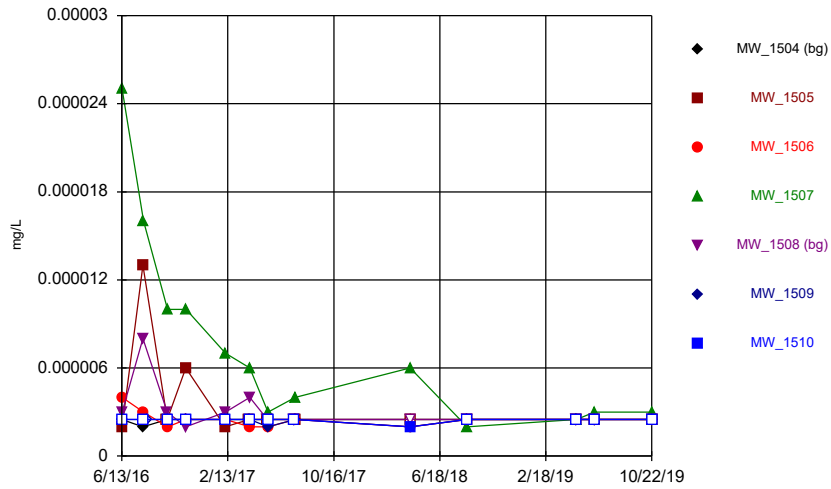
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Time Series



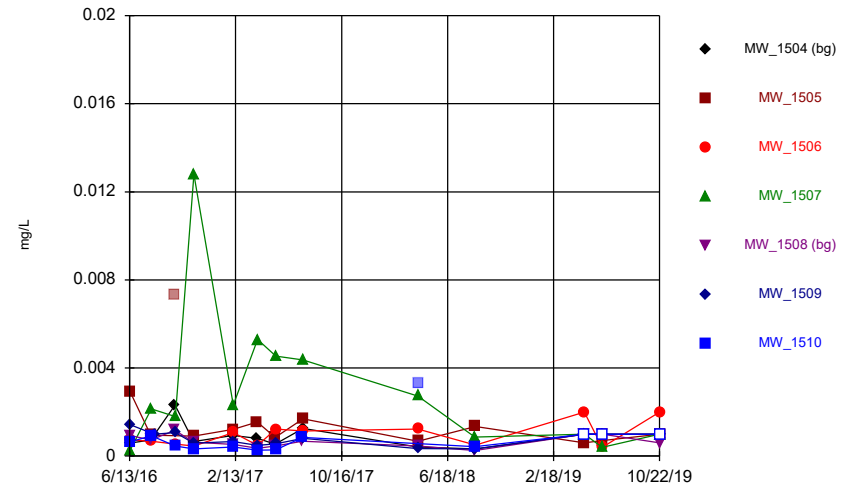
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Time Series



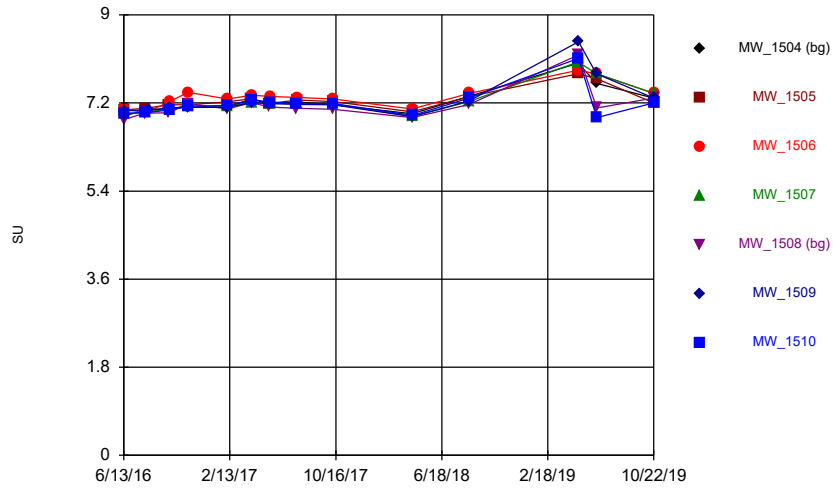
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Time Series



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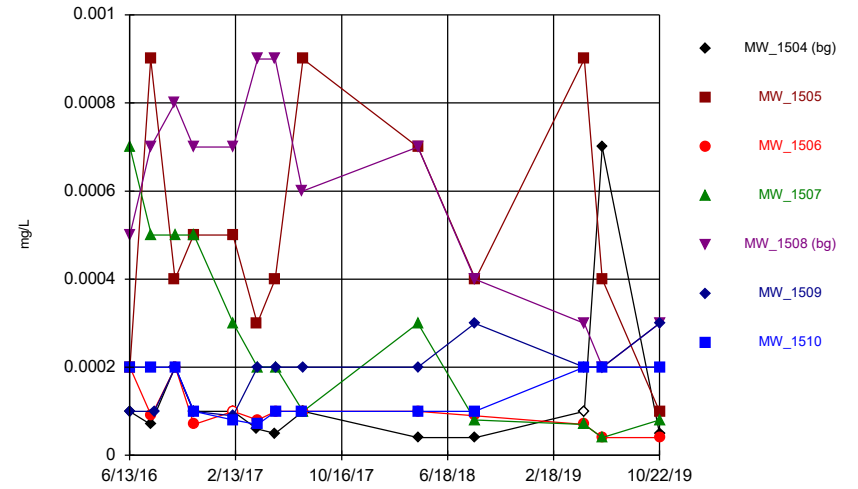
Time Series



Constituent: pH, field Analysis Run 12/27/2019 9:59 AM View: All Data
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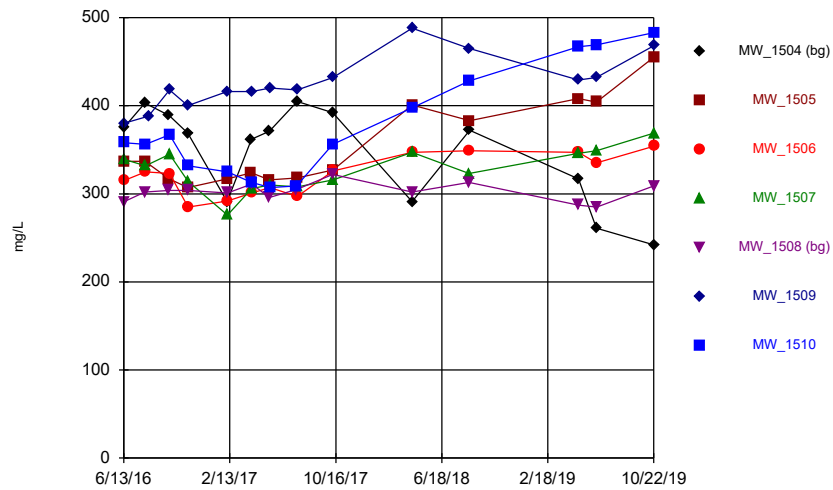
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Time Series



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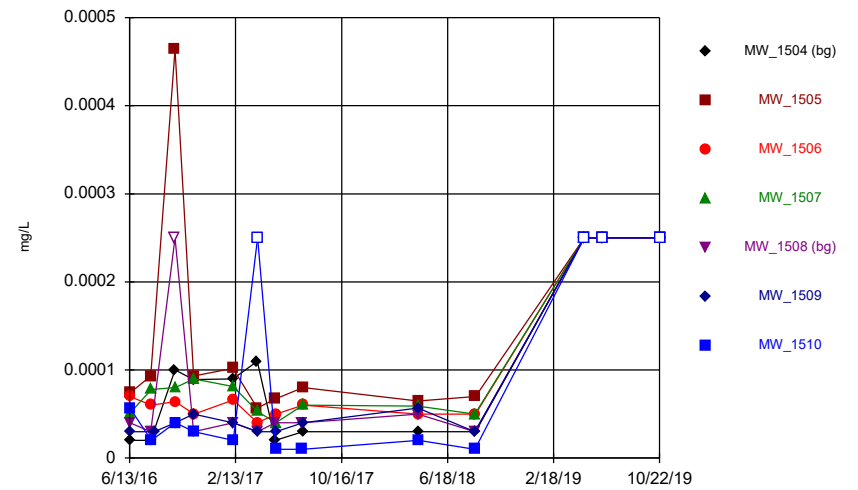
Time Series



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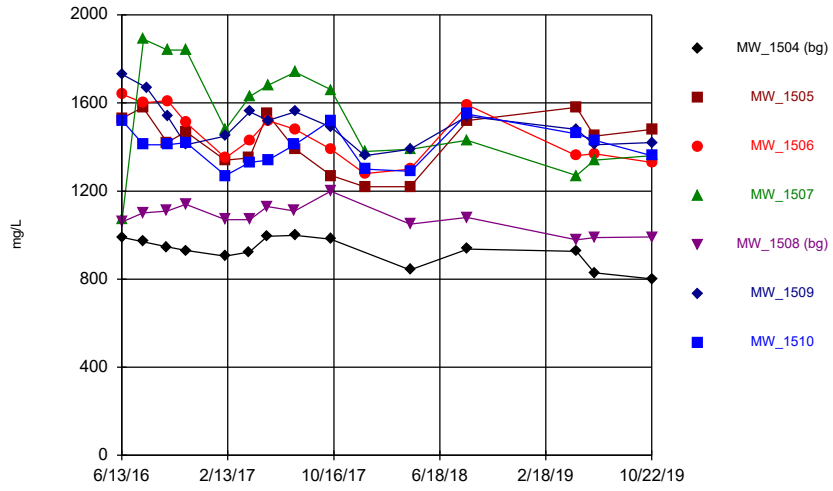
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Time Series



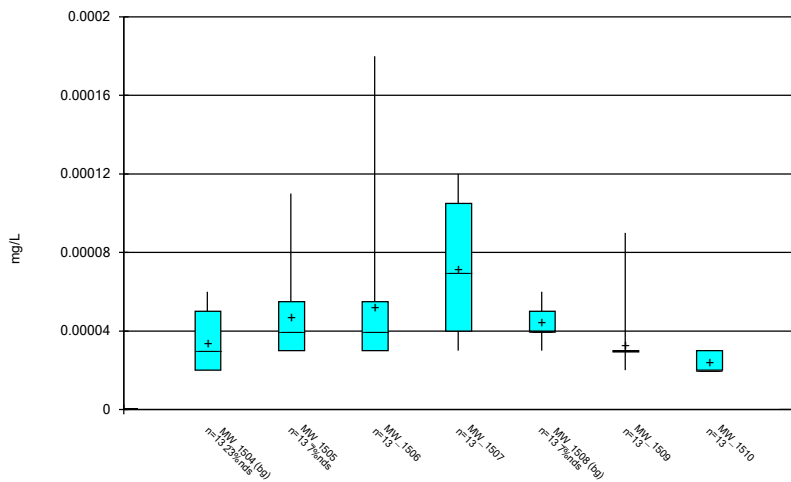
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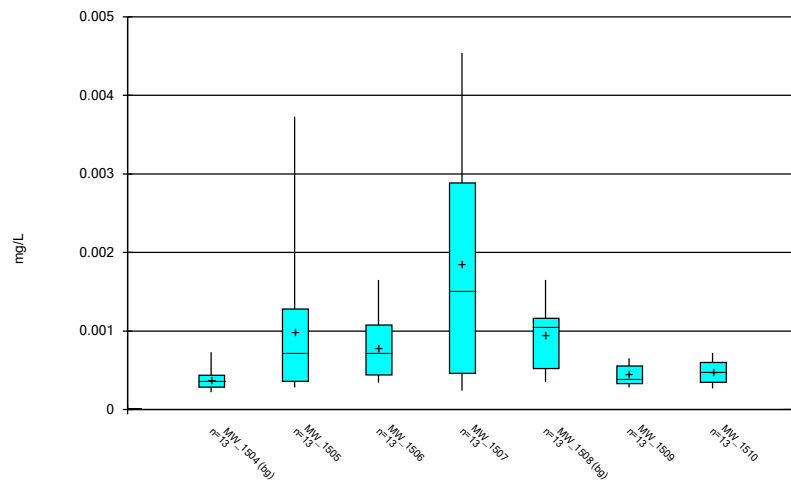
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Box & Whiskers Plot



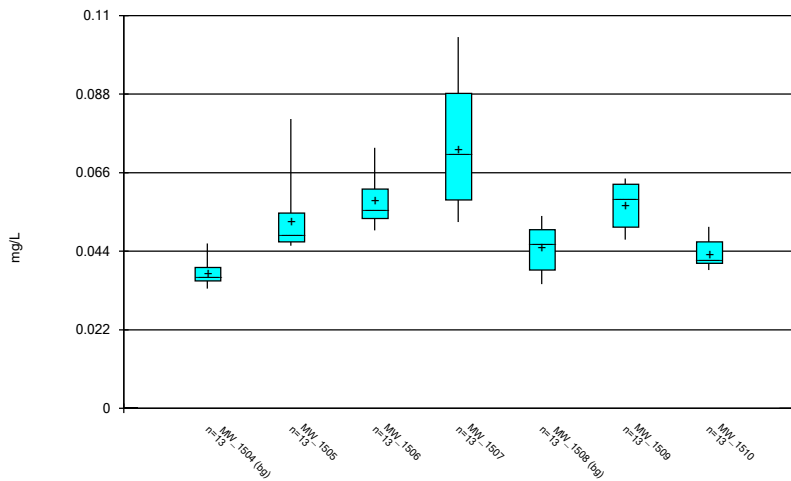
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Box & Whiskers Plot



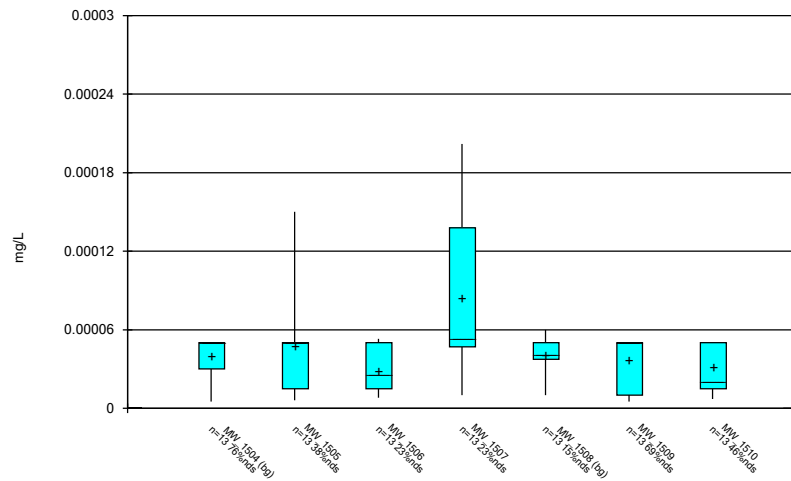
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 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



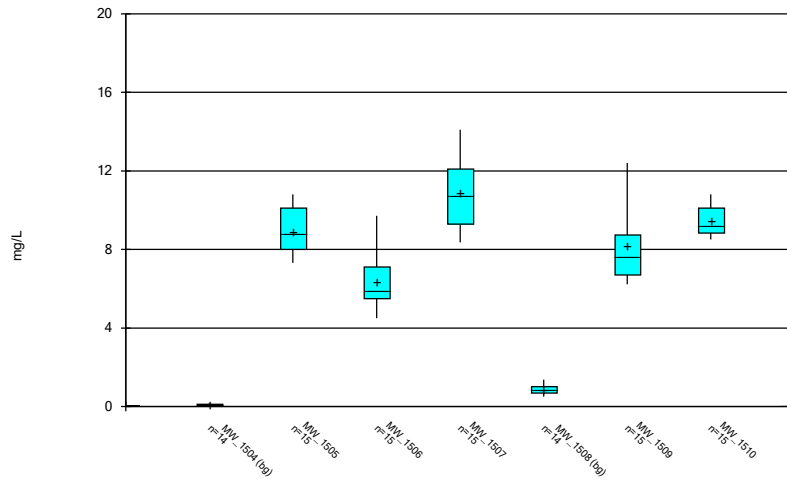
Constituent: Barium, total Analysis Run 12/27/2019 10:00 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



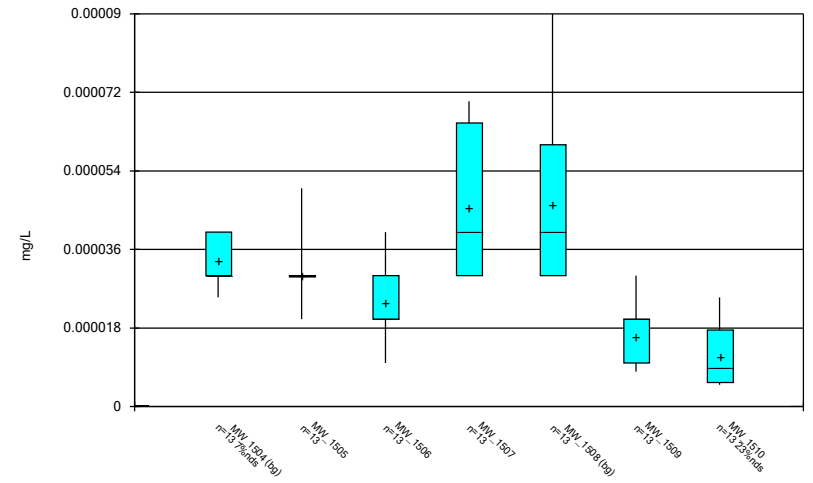
Constituent: Beryllium, total Analysis Run 12/27/2019 10:00 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



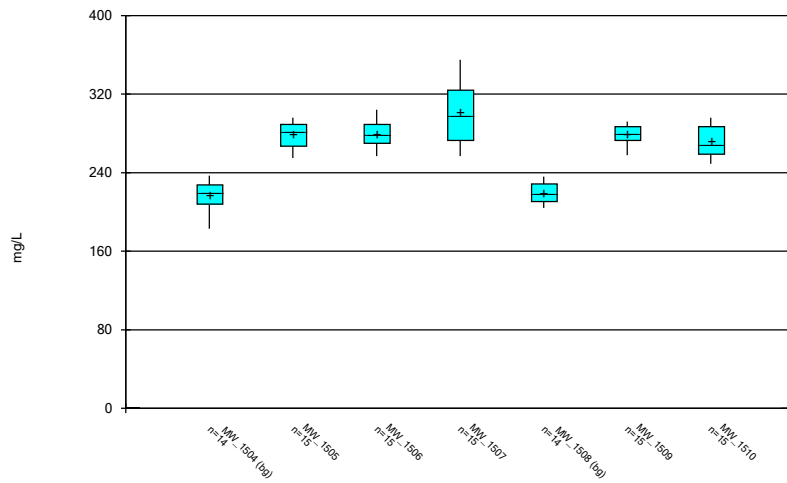
Constituent: Boron, total Analysis Run 12/27/2019 10:00 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



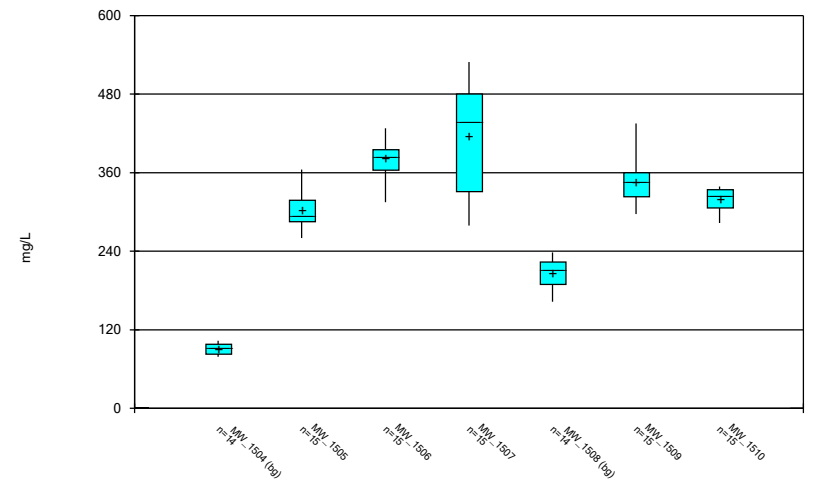
Constituent: Cadmium, total Analysis Run 12/27/2019 10:00 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



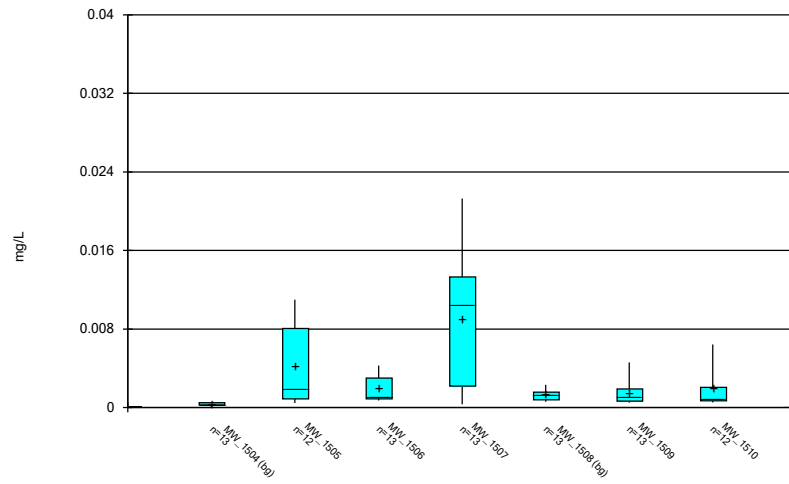
Constituent: Calcium, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



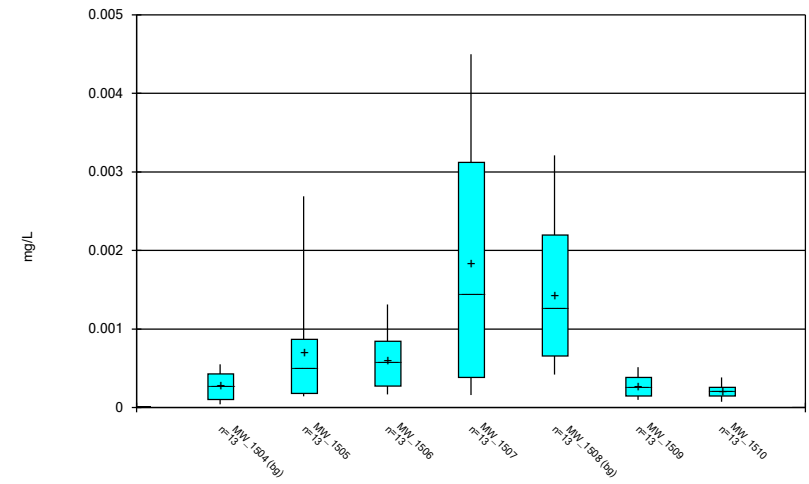
Constituent: Chloride, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



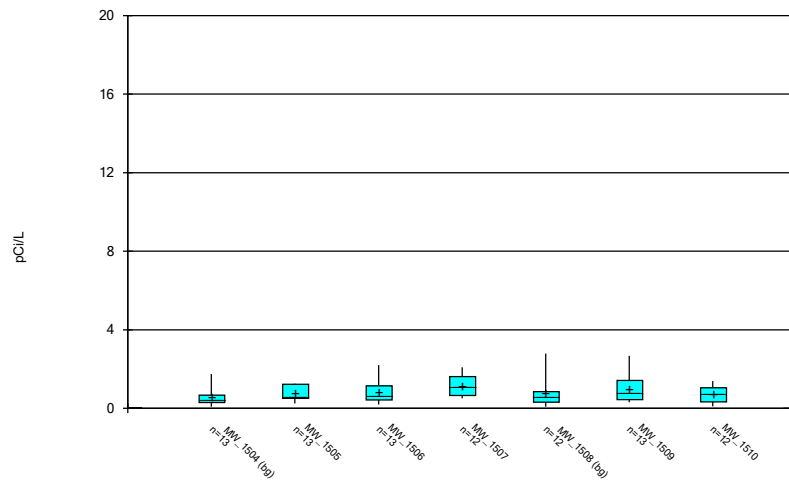
Constituent: Chromium, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



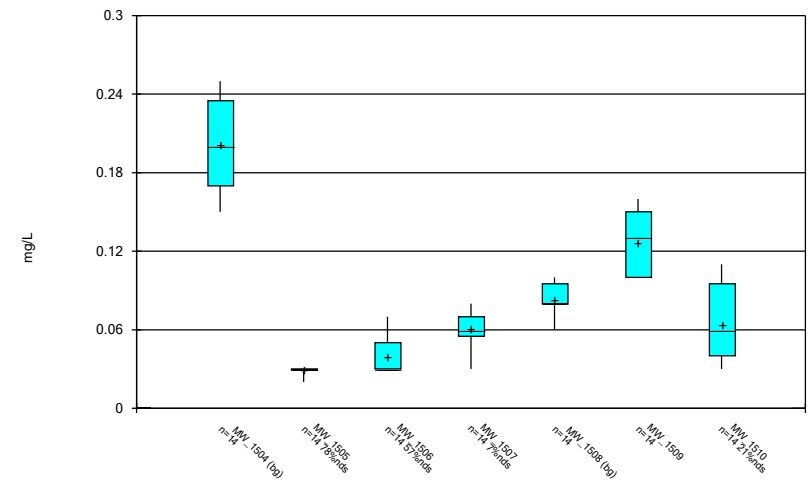
Constituent: Cobalt, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



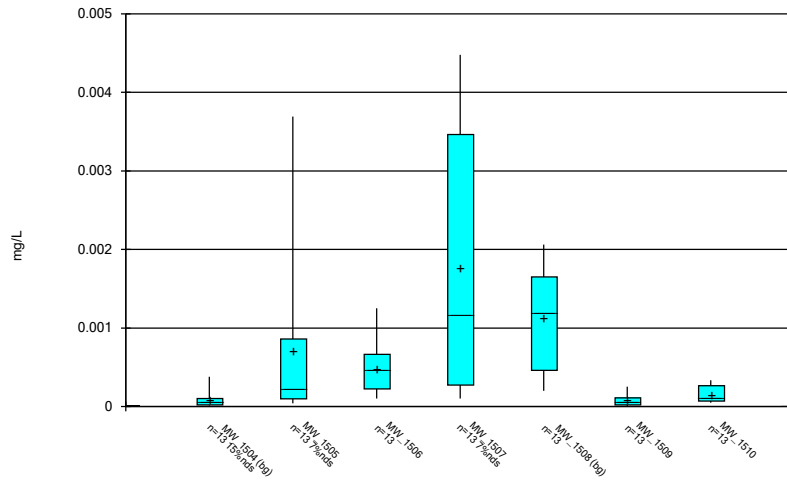
Constituent: Combined Radium 226 + 228 Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



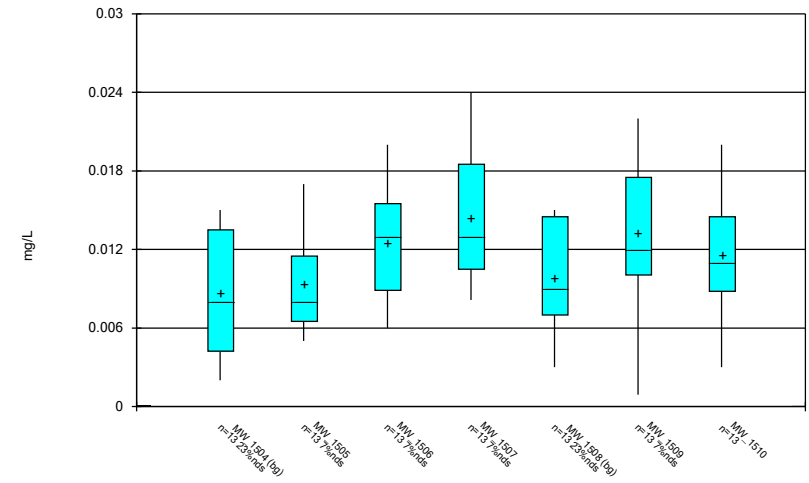
Constituent: Fluoride, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



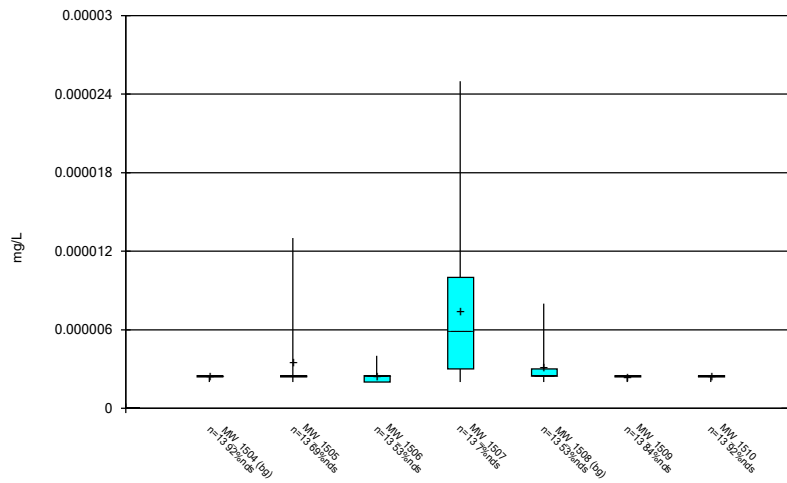
Constituent: Lead, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



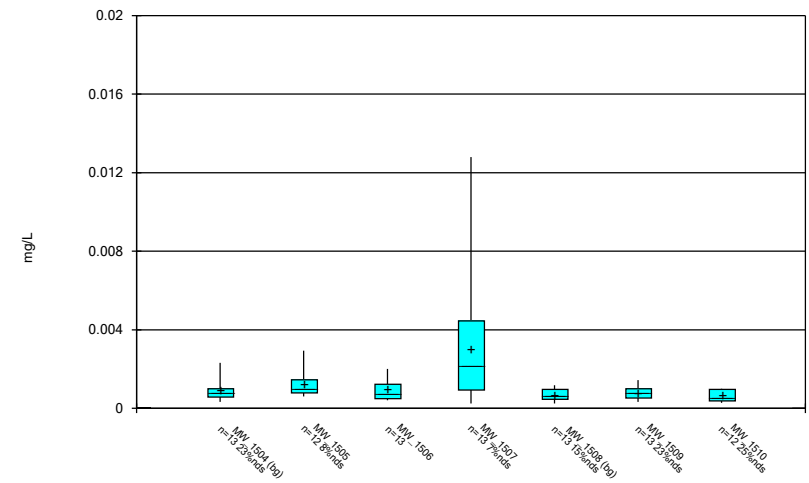
Constituent: Lithium, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



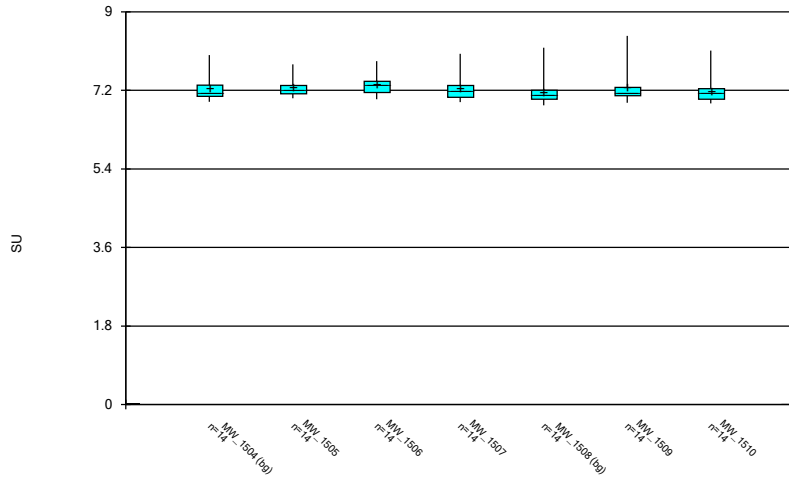
Constituent: Mercury, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



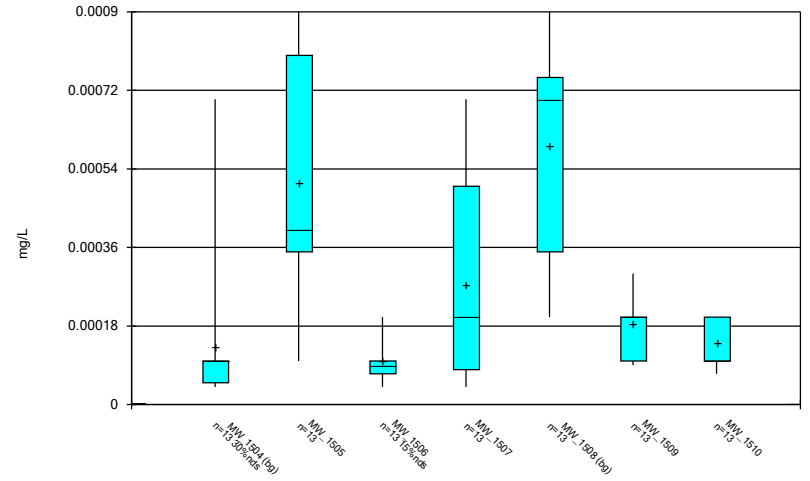
Constituent: Molybdenum, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



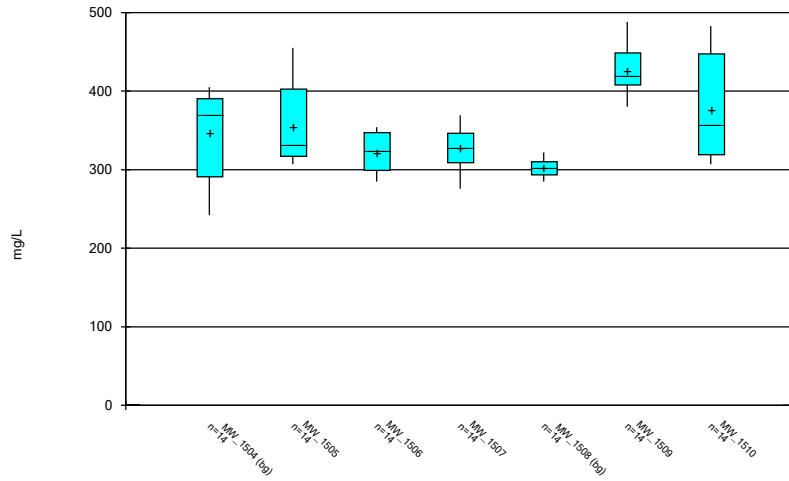
Constituent: pH, field Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



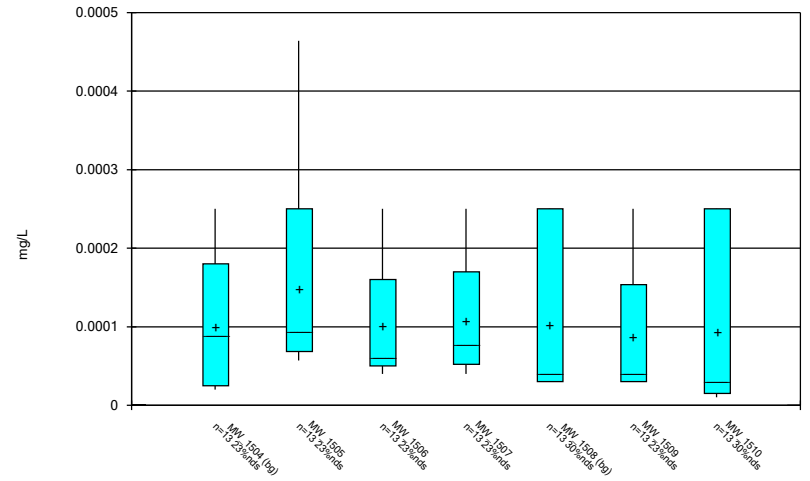
Constituent: Selenium, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



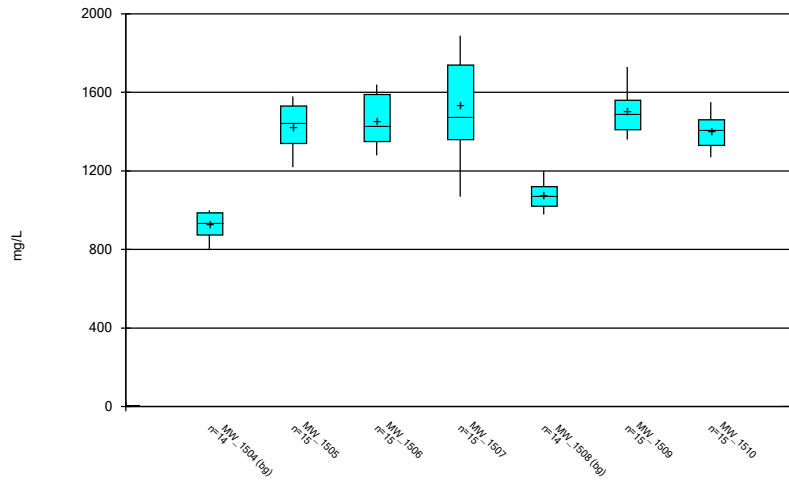
Constituent: Sulfate, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



Constituent: Thallium, total Analysis Run 12/27/2019 10:01 AM View: All Data
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



Constituent: Total Dissolved Solids [TDS] Analysis Run 12/27/2019 10:01 AM View: All Data
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Outlier Summary

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/27/2019, 9:57 AM

MW_1505 Chromium, total (mg/L)
MW_1510 Chromium, total (mg/L)
MW_1507 Combined Radium 226 + 228 (pCi/L)
MW_1508 Combined Radium 226 + 228 (pCi/L)
MW_1510 Combined Radium 226 + 228 (pCi/L)
MW_1505 Molybdenum, total (mg/L)
MW_1510 Molybdenum, total (mg/L)

| | | | | | | |
|-----------|------------|------------|------------|-------------|------------|--|
| 6/14/2016 | 0.0332 (o) | | | | | |
| 9/26/2016 | | | | 0.00735 (o) | | |
| 2/8/2017 | | 16.587 (o) | 12.465 (o) | 6.828 (o) | | |
| 4/12/2018 | 0.0274 (o) | | | | 0.0033 (o) | |

Interwell Outlier Analysis - Significant Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/23/2019, 12:35 PM

| <u>Constituent</u> | <u>Well</u> | <u>Outlier</u> | <u>Value(s)</u> | <u>Date(s)</u> | <u>Method</u> | <u>Alpha</u> | <u>N</u> | <u>Mean</u> | <u>Std. Dev.</u> | <u>Distribution</u> | <u>Normality Test</u> |
|--------------------|--------------|----------------|-----------------|----------------|---------------|--------------|----------|-------------|------------------|---------------------|-----------------------|
| pH, field (SU) | MW_1504,M... | Yes | 8.01,8.18 | n/a w/com... | NP | NaN | 28 | 7.201 | 0.2947 | ln(x) | ShapiroWilk |

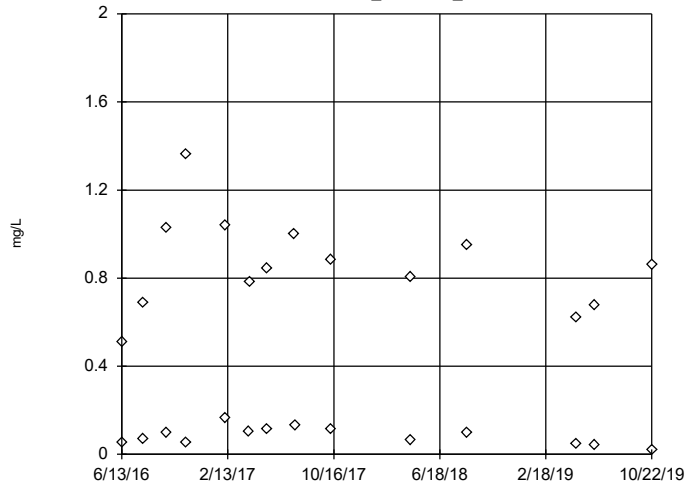
Interwell Outlier Analysis - All Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/23/2019, 12:35 PM

| Constituent | Well | Outlier | Value(s) | Date(s) | Method | Alpha | N | Mean | Std. Dev. | Distribution | Normality Test |
|------------------------------------|---------------------|------------|------------------|---------------------|-----------|------------|-----------|--------------|---------------|--------------|--------------------|
| Boron, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 28 | 0.4722 | 0.4236 | ln(x) | ShapiroWilk |
| Calcium, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 28 | 218.3 | 12.15 | x^6 | ShapiroWilk |
| Chloride, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 28 | 148.9 | 61.33 | ln(x) | ShapiroWilk |
| pH, field (SU) | MW_1504,M... | Yes | 8.01,8.18 | n/a w/com... | NP | NaN | 28 | 7.201 | 0.2947 | ln(x) | ShapiroWilk |
| Total Dissolved Solids [TDS] (m... | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 28 | 1002 | 98.35 | x^2 | ShapiroWilk |

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

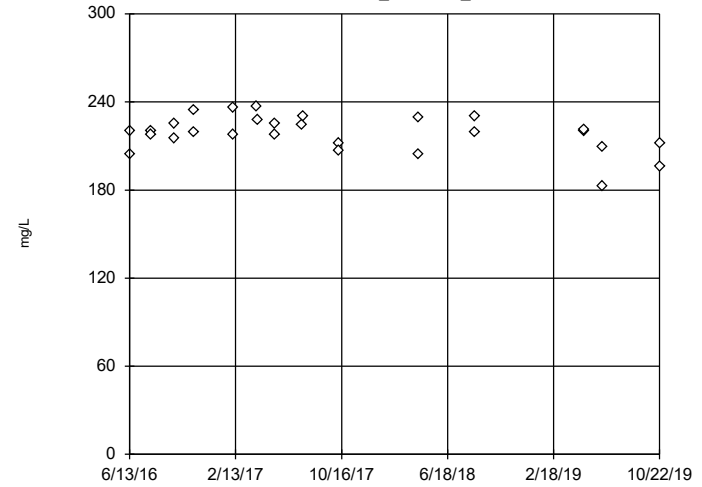


n = 28
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 960.9, low cutoff = 0.00007277, based on IQR multiplier of 3.

Constituent: Boron, total Analysis Run 12/23/2019 12:33 PM View: Interwell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

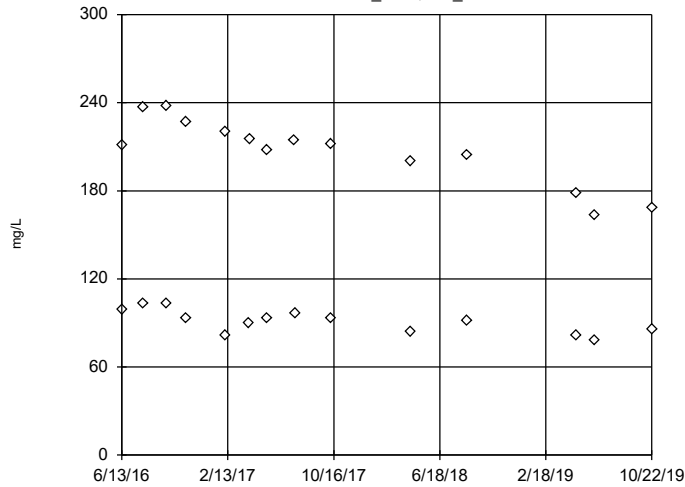


n = 28
 No outliers found.
 Tukey's method selected by user.
 Data were x^6 transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 253.9, low cutoff = -186.6, based on IQR multiplier of 3.

Constituent: Calcium, total Analysis Run 12/23/2019 12:33 PM View: Interwell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

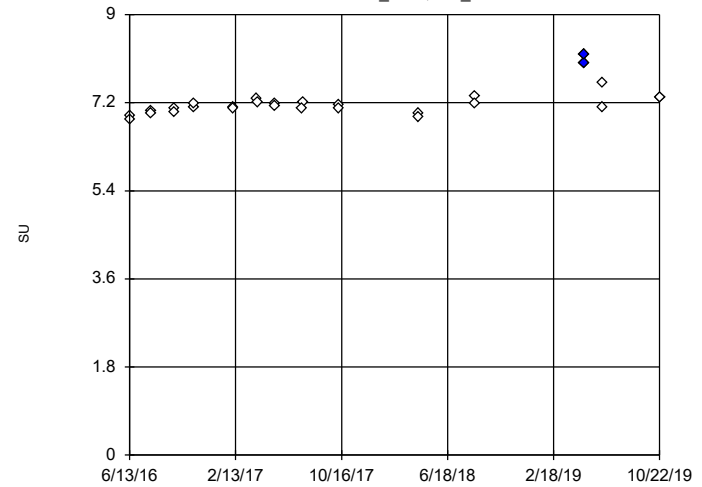


n = 28
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 2541, low cutoff = 7.688, based on IQR multiplier of 3.

Constituent: Chloride, total Analysis Run 12/23/2019 12:33 PM View: Interwell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

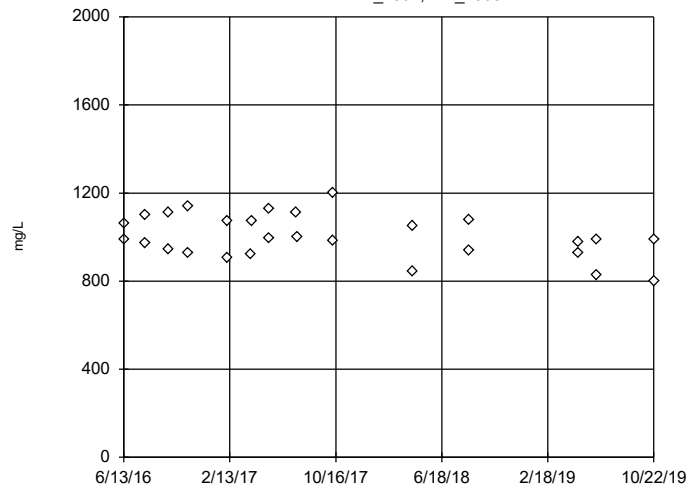


n = 28
 Outliers are drawn as solid.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 7.868, low cutoff = 6.501, based on IQR multiplier of 3.

Constituent: pH, field Analysis Run 12/23/2019 12:34 PM View: Interwell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508



n = 28

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

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

High cutoff = 1418, low cutoff = 122.6, based on IQR multiplier of 3.

Constituent: Total Dissolved Solids [TDS] Analysis Run 12/23/2019 12:34 PM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

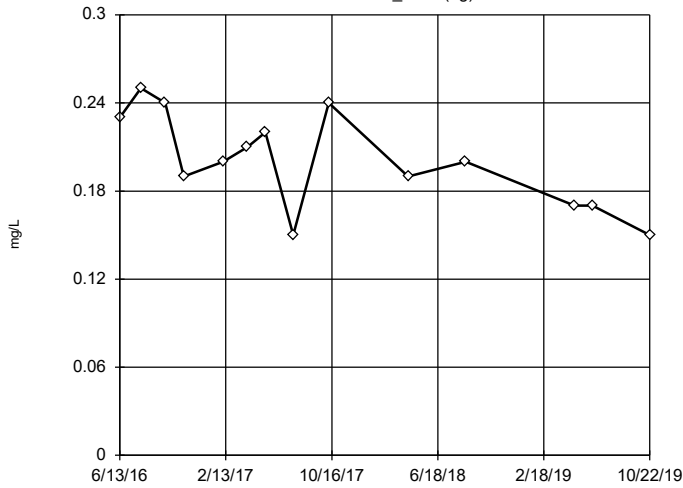
Intrawell Outlier Analysis - All Results (No Significant)

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/23/2019, 12:37 PM

| Constituent | Well | Outlier | Value(s) | Date(s) | Method | Alpha | N | Mean | Std. Dev. | Distribution | Normality Test |
|------------------------|--------------|---------|----------|---------|--------|-------|----|---------|-----------|--------------|----------------|
| Fluoride, total (mg/L) | MW_1504 (bg) | No | n/a | n/a | NP | NaN | 14 | 0.2007 | 0.03293 | x^2 | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1505 | n/a | n/a | n/a | NP | NaN | 14 | 0.07929 | 0.03407 | unknown | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 14 | 0.07929 | 0.02674 | x^(1/3) | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 14 | 0.06571 | 0.01284 | ln(x) | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1508 (bg) | No | n/a | n/a | NP | NaN | 14 | 0.08286 | 0.01139 | sqrt(x) | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 14 | 0.1264 | 0.0253 | x^4 | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 14 | 0.07786 | 0.02359 | ln(x) | ShapiroWilk |
| Sulfate, total (mg/L) | MW_1504 (bg) | No | n/a | n/a | NP | NaN | 14 | 345.7 | 54.46 | x^6 | ShapiroWilk |
| Sulfate, total (mg/L) | MW_1505 | No | n/a | n/a | NP | NaN | 14 | 353.6 | 46.87 | ln(x) | ShapiroWilk |
| Sulfate, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 14 | 321.6 | 22.88 | sqrt(x) | ShapiroWilk |
| Sulfate, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 14 | 327.1 | 24.02 | x^3 | ShapiroWilk |
| Sulfate, total (mg/L) | MW_1508 (bg) | No | n/a | n/a | NP | NaN | 14 | 302.3 | 10.15 | x^2 | ShapiroWilk |
| Sulfate, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 14 | 426.4 | 30.14 | ln(x) | ShapiroWilk |
| Sulfate, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 14 | 376.3 | 62.34 | ln(x) | ShapiroWilk |

Tukey's Outlier Screening

MW_1504 (bg)

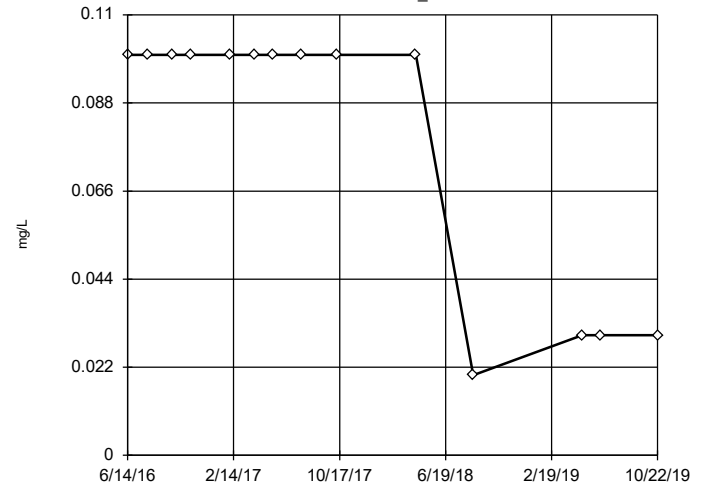


n = 14
No outliers found.
Tukey's method selected by user.
Data were square transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.3665, low cutoff = -0.2239, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1505

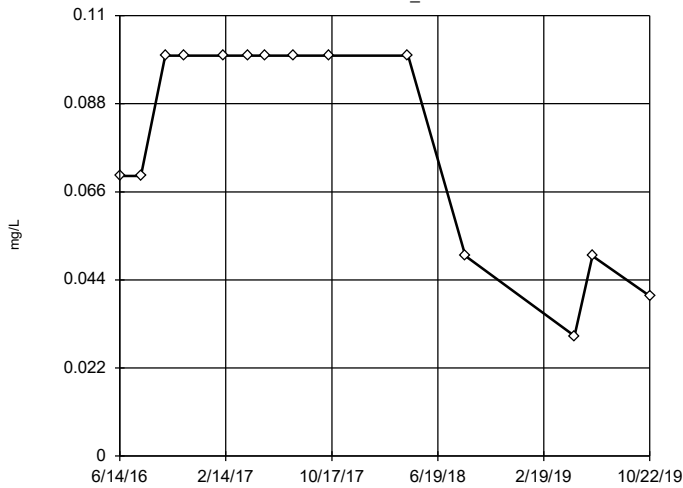


n = 14
No outliers found.
Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
The results were invalidated, because both the lower and upper quartiles represent reporting limits.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1506

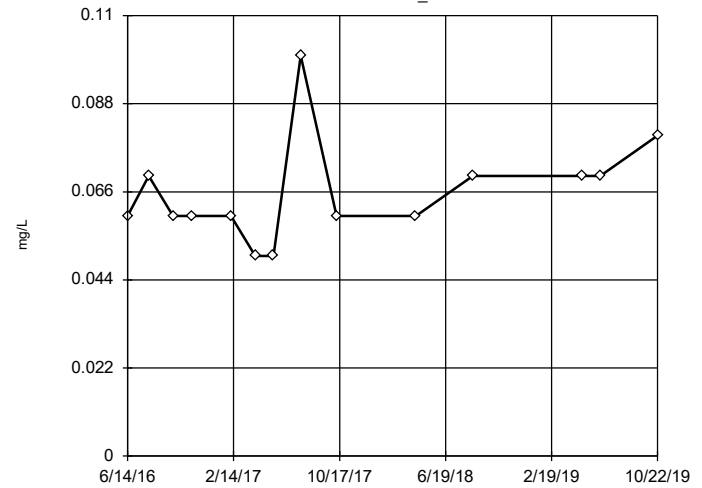


n = 14
No outliers found.
Tukey's method selected by user.
Data were cube root transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.4243, low cutoff = 0.0005341, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1507

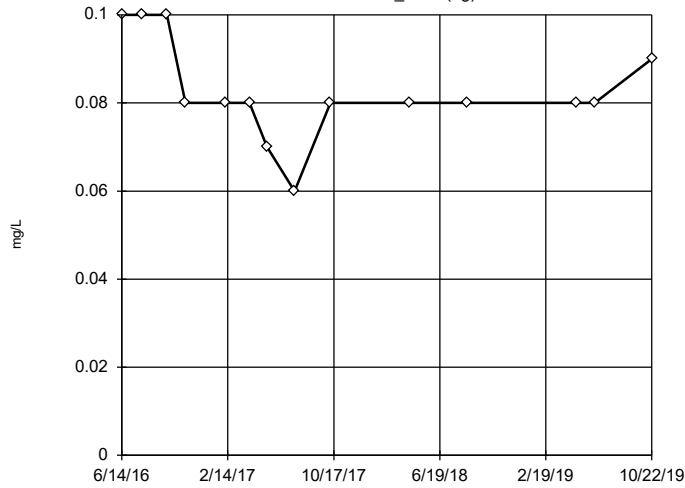


n = 14
No outliers found.
Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.1112, low cutoff = 0.03778, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1508 (bg)



n = 14

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

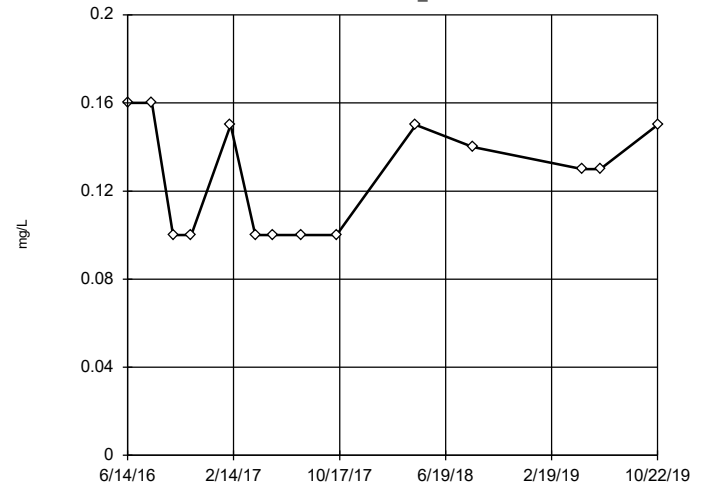
Data were square root transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.1474, low cutoff = 0.04286, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1509



n = 14

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

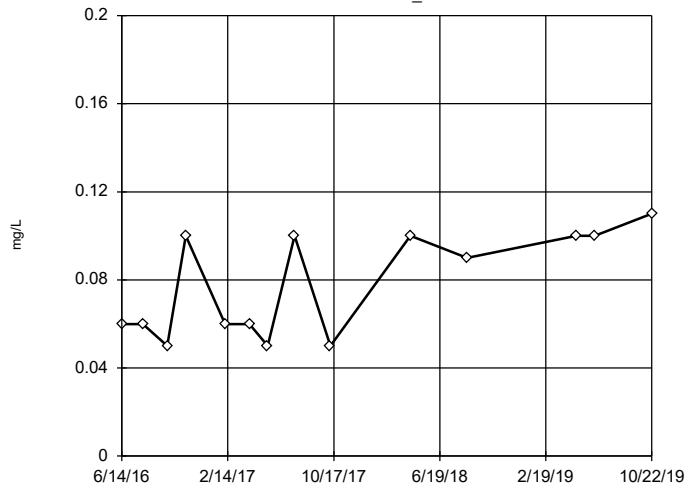
Data were x^4 transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.2038, low cutoff = -0.1829, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1510



n = 14

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

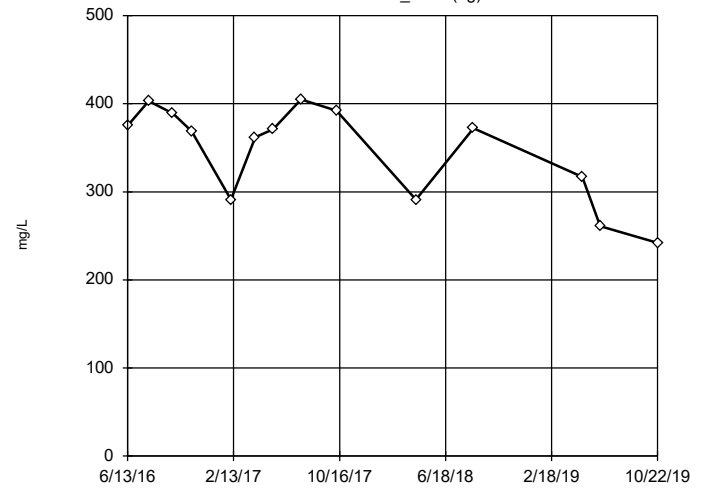
Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.6086, low cutoff = 0.009, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1504 (bg)



n = 14

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

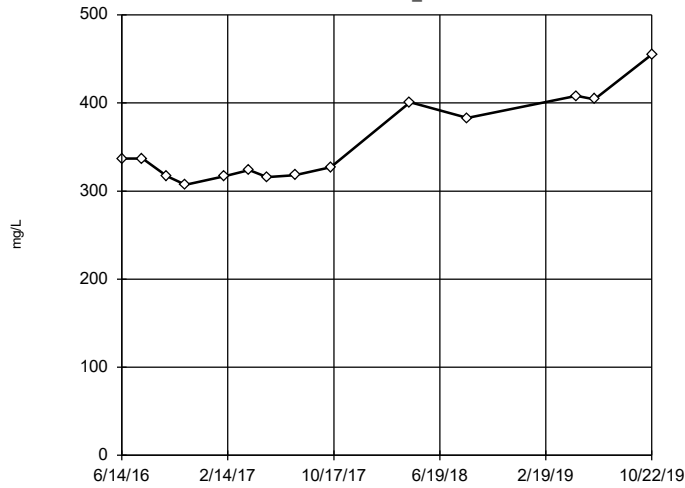
Data were x^6 transformed to achieve best W statistic (graph shown in original units).

High cutoff = 480.9, low cutoff = -449.2, based on IQR multiplier of 3.

Constituent: Sulfate, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1505

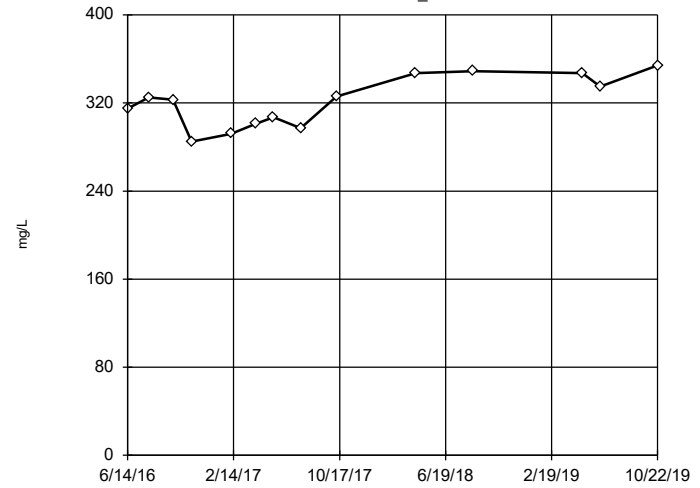


n = 14
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 823.9, low cutoff = 154.9, based on IQR multiplier of 3.

Constituent: Sulfate, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1506

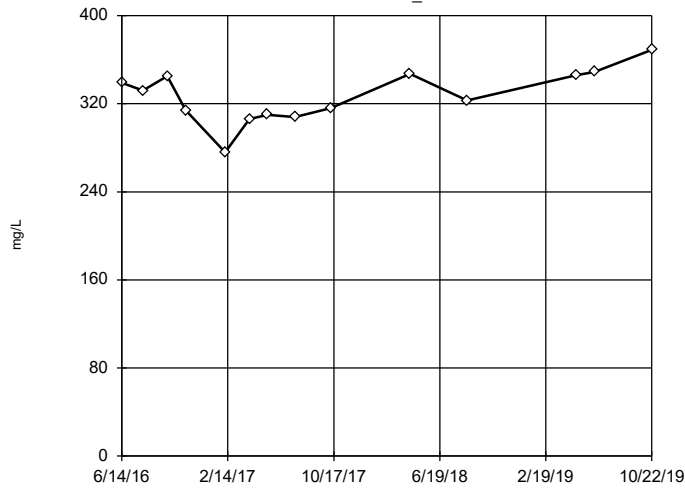


n = 14
 No outliers found.
 Tukey's method selected by user.
 Data were square root transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 512.4, low cutoff = 176.4, based on IQR multiplier of 3.

Constituent: Sulfate, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1507

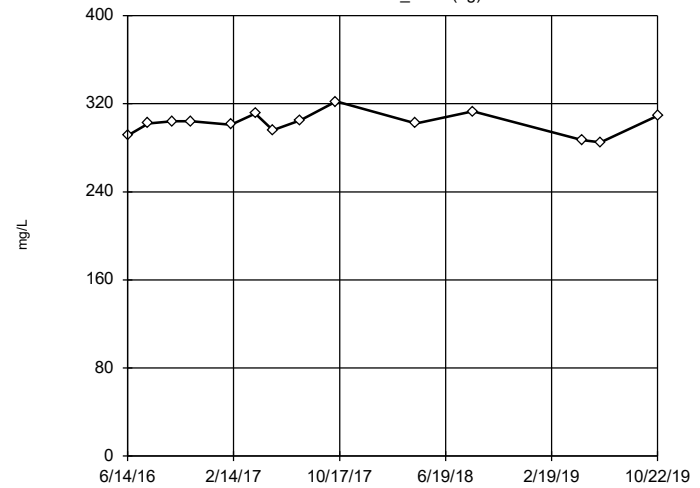


n = 14
 No outliers found.
 Tukey's method selected by user.
 Data were cube transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 427.1, low cutoff = -189.3, based on IQR multiplier of 3.

Constituent: Sulfate, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1508 (bg)

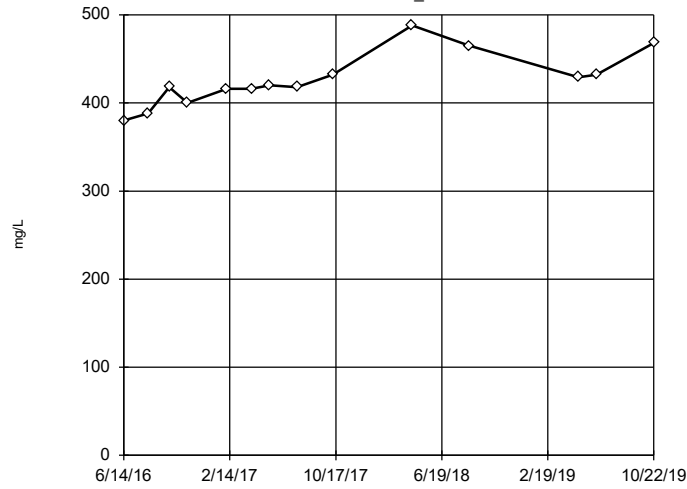


n = 14
 No outliers found.
 Tukey's method selected by user.
 Data were square transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 354.9, low cutoff = 237.3, based on IQR multiplier of 3.

Constituent: Sulfate, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1509



n = 14

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

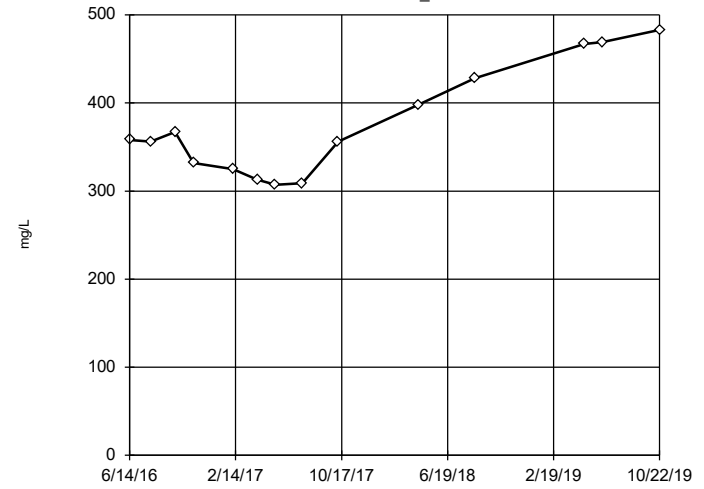
Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 594.5, low cutoff = 307.5, based on IQR multiplier of 3.

Constituent: Sulfate, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1510



n = 14

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

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

High cutoff = 1231, low cutoff = 115.8, based on IQR multiplier of 3.

Constituent: Sulfate, total Analysis Run 12/23/2019 12:36 PM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Appendix IV Outlier Analysis - Significant Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/23/2019, 12:44 PM

| <u>Constituent</u> | <u>Well</u> | <u>Outlier</u> | <u>Value(s)</u> | <u>Date(s)</u> | <u>Method</u> | <u>Alpha</u> | <u>N</u> | <u>Mean</u> | <u>Std. Dev.</u> | <u>Distribution</u> | <u>Normality Test</u> |
|-----------------------|--------------|----------------|-----------------|----------------|---------------|--------------|----------|-------------|------------------|---------------------|-----------------------|
| Mercury, total (mg/L) | MW_1504,M... | Yes | 0.000008 | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |

Appendix IV Outlier Analysis - Significant Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/23/2019, 12:44 PM

| Constituent | Well | Outlier | Value(s) | Date(s) | Method | Alpha | N | Mean | Std. Dev. | Distribution | Normality Test |
|-----------------------------------|---------------------|------------|-----------------|---------------------|-----------|------------|-----------|-----------------|------------------|--------------|--------------------|
| Antimony, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0000... | x^(1/3) | ShapiroWilk |
| Arsenic, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0004041 | ln(x) | ShapiroWilk |
| Barium, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 26 | 0.04149 | 0.006228 | ln(x) | ShapiroWilk |
| Beryllium, total (mg/L) | MW_1504,M... | n/a | n/a | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0000... | unknown | ShapiroWilk |
| Cadmium, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Chromium, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0005801 | x^(1/3) | ShapiroWilk |
| Cobalt, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0008375 | ln(x) | ShapiroWilk |
| Combined Radium 226 + 228 (pCi/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 25 | 0.6592 | 0.5945 | ln(x) | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 28 | 0.1418 | 0.0647 | ln(x) | ShapiroWilk |
| Lead, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0006739 | ln(x) | ShapiroWilk |
| Lithium, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 26 | 0.00809 | 0.004519 | normal | ShapiroWilk |
| Mercury, total (mg/L) | MW_1504,M... | Yes | 0.000008 | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Molybdenum, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0004126 | ln(x) | ShapiroWilk |
| Selenium, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0003154 | x^(1/3) | ShapiroWilk |
| Thallium, total (mg/L) | MW_1504,M... | No | n/a | n/a w/com... | NP | NaN | 26 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Antimony, total (mg/L) | MW_1505 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Antimony, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Antimony, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | normal | ShapiroWilk |
| Antimony, total (mg/L) | MW_1509 | n/a | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000175 | unknown | ShapiroWilk |
| Antimony, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | normal | ShapiroWilk |
| Arsenic, total (mg/L) | MW_1505 | No | n/a | n/a | NP | NaN | 13 | 0.00099 | 0.0009835 | ln(x) | ShapiroWilk |
| Arsenic, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0003885 | ln(x) | ShapiroWilk |
| Arsenic, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.001845 | 0.001442 | x^(1/3) | ShapiroWilk |
| Arsenic, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0001218 | ln(x) | ShapiroWilk |
| Arsenic, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0001504 | x^(1/3) | ShapiroWilk |
| Barium, total (mg/L) | MW_1505 | No | n/a | n/a | NP | NaN | 13 | 0.05242 | 0.009996 | ln(x) | ShapiroWilk |
| Barium, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.05828 | 0.006931 | ln(x) | ShapiroWilk |
| Barium, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.07286 | 0.0177 | ln(x) | ShapiroWilk |
| Barium, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.05705 | 0.006493 | x^5 | ShapiroWilk |
| Barium, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.04329 | 0.003881 | ln(x) | ShapiroWilk |
| Beryllium, total (mg/L) | MW_1505 | n/a | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000402 | unknown | ShapiroWilk |
| Beryllium, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | x^(1/3) | ShapiroWilk |
| Beryllium, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | x^(1/3) | ShapiroWilk |
| Beryllium, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000179 | ln(x) | ShapiroWilk |
| Beryllium, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Cadmium, total (mg/L) | MW_1505 | n/a | n/a | n/a | NP | NaN | 13 | 0.00003 | 0.0000... | unknown | ShapiroWilk |
| Cadmium, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | x^(1/3) | ShapiroWilk |
| Cadmium, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Cadmium, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.000016 | 0.0000... | x^(1/3) | ShapiroWilk |
| Cadmium, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Chromium, total (mg/L) | MW_1505 | No | n/a | n/a | NP | NaN | 13 | 0.00642 | 0.008958 | ln(x) | ShapiroWilk |
| Chromium, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.001926 | 0.001265 | ln(x) | ShapiroWilk |
| Chromium, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.009103 | 0.006975 | sqrt(x) | ShapiroWilk |
| Chromium, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.001411 | 0.001142 | ln(x) | ShapiroWilk |
| Chromium, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.003849 | 0.007334 | ln(x) | ShapiroWilk |
| Cobalt, total (mg/L) | MW_1505 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0007459 | ln(x) | ShapiroWilk |
| Cobalt, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0003431 | sqrt(x) | ShapiroWilk |
| Cobalt, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.001842 | 0.001481 | x^(1/3) | ShapiroWilk |
| Cobalt, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0001376 | ln(x) | ShapiroWilk |
| Cobalt, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | sqrt(x) | ShapiroWilk |
| Combined Radium 226 + 228 (pCi/L) | MW_1505 | No | n/a | n/a | NP | NaN | 13 | 0.7765 | 0.3542 | x^(1/3) | ShapiroWilk |
| Combined Radium 226 + 228 (pCi/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.8521 | 0.5928 | ln(x) | ShapiroWilk |
| Combined Radium 226 + 228 (pCi/L) | MW_1507 | No | n/a | n/a | NP | NaN | 12 | 1.169 | 0.5828 | ln(x) | ShapiroWilk |
| Combined Radium 226 + 228 (pCi/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.9842 | 0.6713 | ln(x) | ShapiroWilk |
| Combined Radium 226 + 228 (pCi/L) | MW_1510 | No | n/a | n/a | NP | NaN | 12 | 0.6986 | 0.4356 | sqrt(x) | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1505 | n/a | n/a | n/a | NP | NaN | 14 | 0.07929 | 0.03407 | unknown | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 14 | 0.07929 | 0.02674 | x^(1/3) | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 14 | 0.06571 | 0.01284 | ln(x) | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 14 | 0.1264 | 0.0253 | x^4 | ShapiroWilk |
| Fluoride, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 14 | 0.07786 | 0.02359 | ln(x) | ShapiroWilk |
| Lead, total (mg/L) | MW_1505 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.001057 | ln(x) | ShapiroWilk |
| Lead, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0003173 | x^(1/3) | ShapiroWilk |
| Lead, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.001746 | 0.001597 | x^(1/3) | ShapiroWilk |
| Lead, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Lead, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.000152 | 0.0000... | ln(x) | ShapiroWilk |
| Lithium, total (mg/L) | MW_1505 | No | n/a | n/a | NP | NaN | 13 | 0.009334 | 0.003674 | ln(x) | ShapiroWilk |
| Lithium, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.01252 | 0.004054 | sqrt(x) | ShapiroWilk |
| Lithium, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.0144 | 0.004737 | ln(x) | ShapiroWilk |

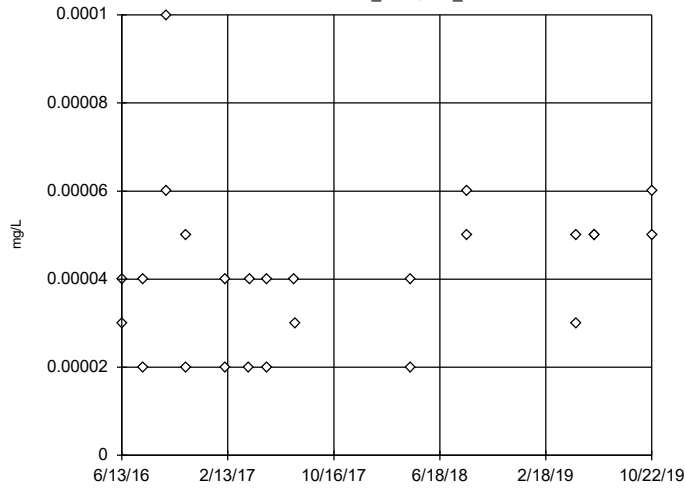
Appendix IV Outlier Analysis - Significant Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/23/2019, 12:44 PM

| Constituent | Well | Outlier | Value(s) | Date(s) | Method | Alpha | N | Mean | Std. Dev. | Distribution | Normality Test |
|--------------------------|---------|---------|----------|---------|--------|-------|----|----------|-----------|--------------|----------------|
| Lithium, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.01331 | 0.005495 | normal | ShapiroWilk |
| Lithium, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.01159 | 0.004465 | normal | ShapiroWilk |
| Mercury, total (mg/L) | MW_1505 | n/a | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | unknown | ShapiroWilk |
| Mercury, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 5.4e-7 | ln(x) | ShapiroWilk |
| Mercury, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Mercury, total (mg/L) | MW_1509 | n/a | n/a | n/a | NP | NaN | 13 | 0.000... | 1.9e-7 | unknown | ShapiroWilk |
| Mercury, total (mg/L) | MW_1510 | n/a | n/a | n/a | NP | NaN | 13 | 0.000... | 1.4e-7 | unknown | ShapiroWilk |
| Molybdenum, total (mg/L) | MW_1505 | No | n/a | n/a | NP | NaN | 13 | 0.001673 | 0.001815 | ln(x) | ShapiroWilk |
| Molybdenum, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0005515 | ln(x) | ShapiroWilk |
| Molybdenum, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.003038 | 0.003355 | ln(x) | ShapiroWilk |
| Molybdenum, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0003284 | sqrt(x) | ShapiroWilk |
| Molybdenum, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.000794 | ln(x) | ShapiroWilk |
| Selenium, total (mg/L) | MW_1505 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.000266 | sqrt(x) | ShapiroWilk |
| Selenium, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Selenium, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0002139 | x^(1/3) | ShapiroWilk |
| Selenium, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | normal | ShapiroWilk |
| Selenium, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000563 | ln(x) | ShapiroWilk |
| Thallium, total (mg/L) | MW_1505 | No | n/a | n/a | NP | NaN | 12 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Thallium, total (mg/L) | MW_1506 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Thallium, total (mg/L) | MW_1507 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Thallium, total (mg/L) | MW_1509 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |
| Thallium, total (mg/L) | MW_1510 | No | n/a | n/a | NP | NaN | 13 | 0.000... | 0.0000... | ln(x) | ShapiroWilk |

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

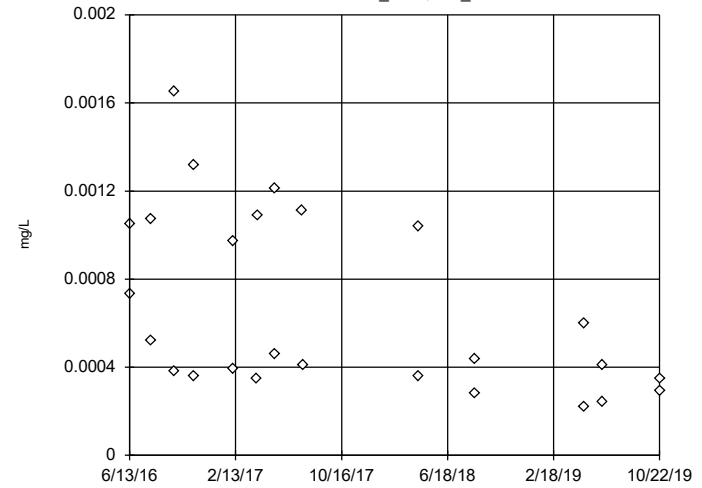


n = 26
 No outliers found.
 Tukey's method selected by user.
 Data were cube root transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.0002164,
 low cutoff = 2.1e-7, based on IQR multiplier of 3.

Constituent: Antimony, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

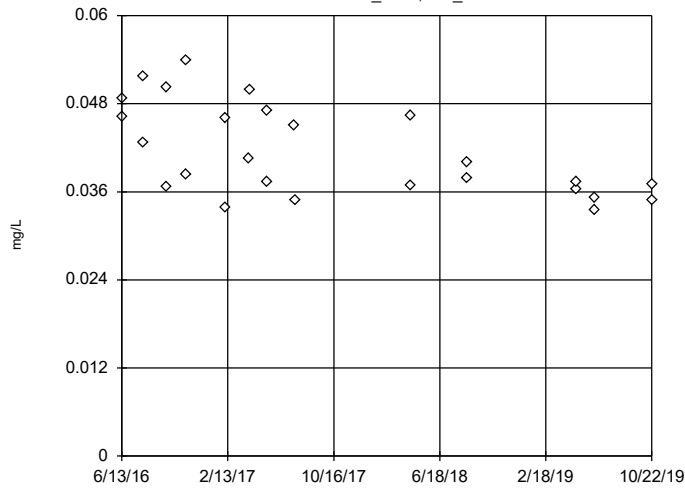


n = 26
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.02822,
 low cutoff = 0.00001333, based on IQR multiplier of 3.

Constituent: Arsenic, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

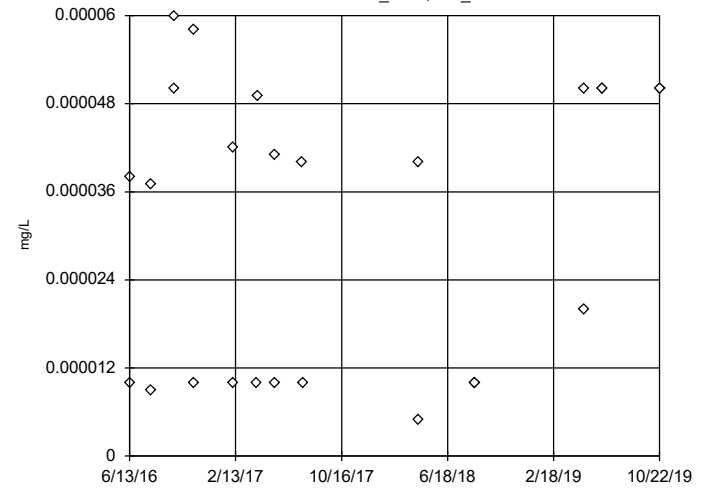


n = 26
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.0974,
 low cutoff = 0.01752, based on IQR multiplier of 3.

Constituent: Barium, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

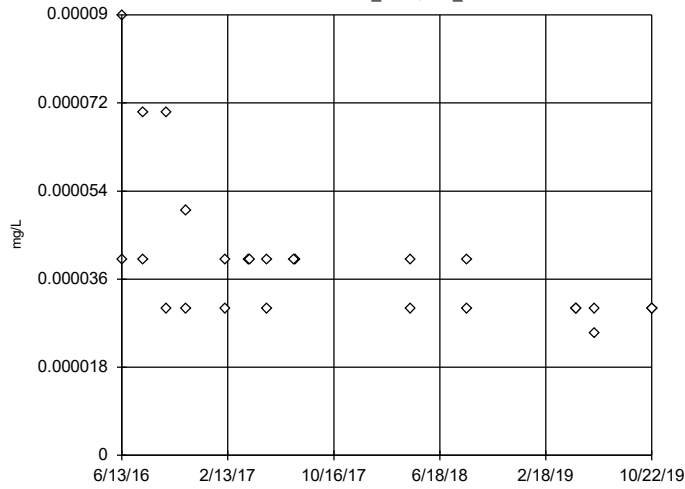


n = 26
 No outliers found.
 Tukey's method selected by user.
 Data were square transformed to achieve best W statistic (graph shown in original units).
 The results were invalidated, because both the lower and upper quartiles represent reporting limits.

Constituent: Beryllium, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

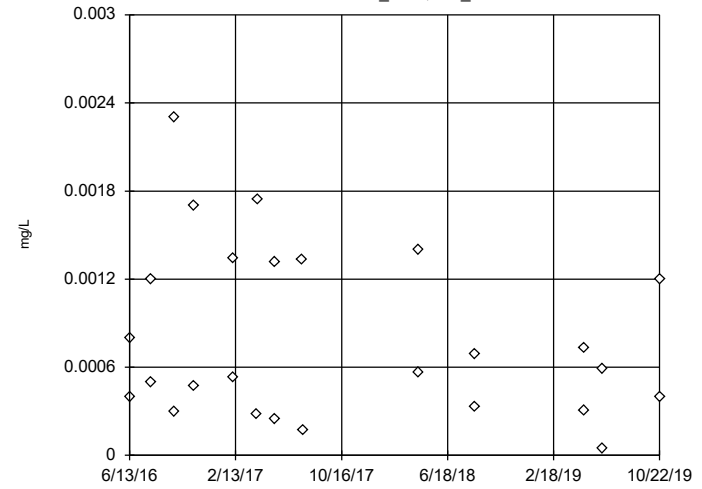


n = 26
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.00009481, low cutoff = 0.00001266, based on IQR multiplier of 3.

Constituent: Cadmium, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

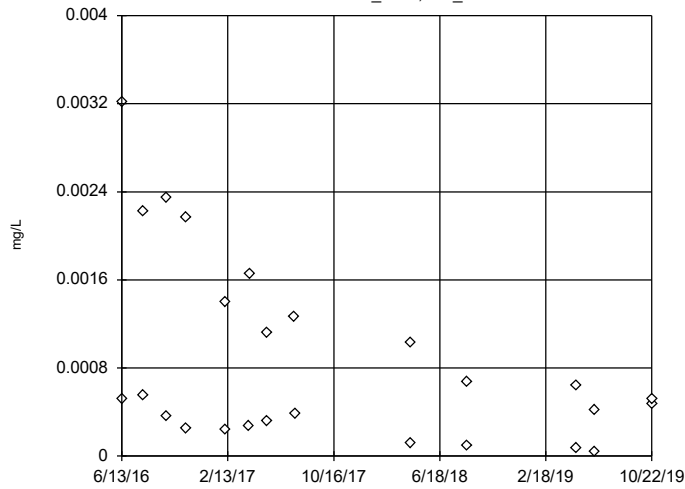


n = 26
 No outliers found.
 Tukey's method selected by user.
 Data were cube root transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.01291, low cutoff = -0.0001806, based on IQR multiplier of 3.

Constituent: Chromium, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

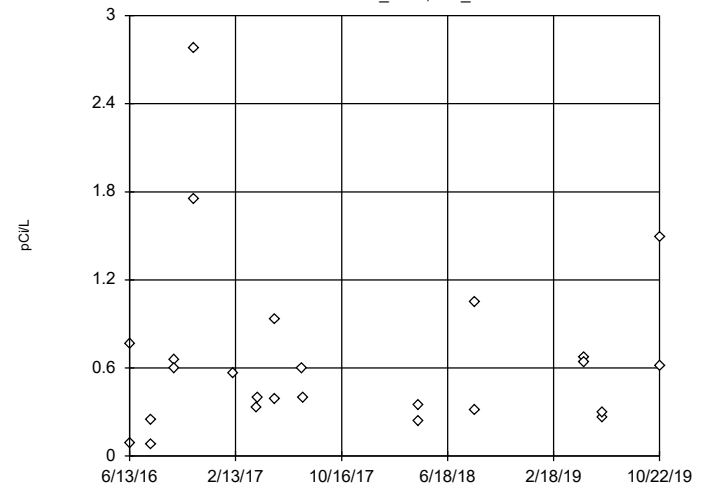


n = 26
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.1745, low cutoff = 0.000002007, based on IQR multiplier of 3.

Constituent: Cobalt, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

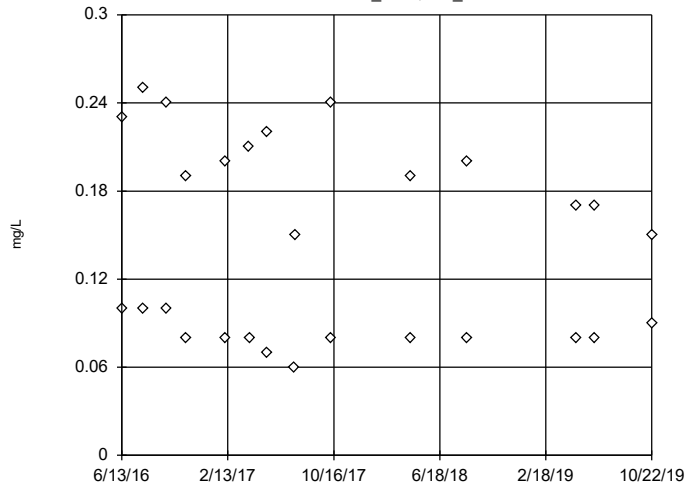


n = 25
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 9.364, low cutoff = 0.02336, based on IQR multiplier of 3.

Constituent: Combined Radium 226 + 228 Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

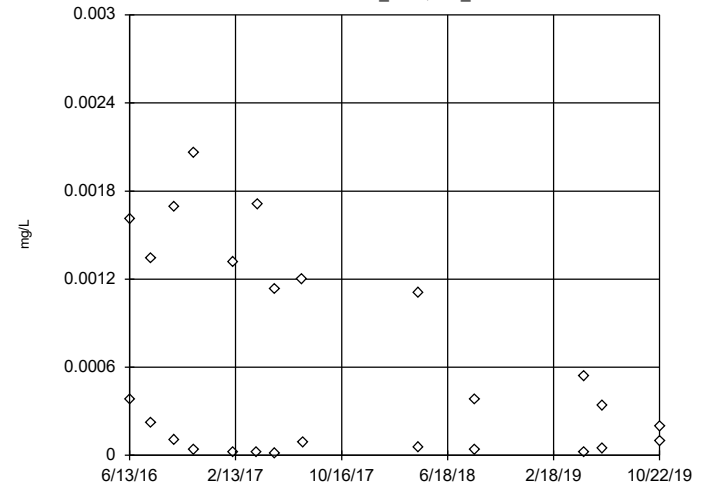


n = 28
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 3.125, low cutoff = 0.00512, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

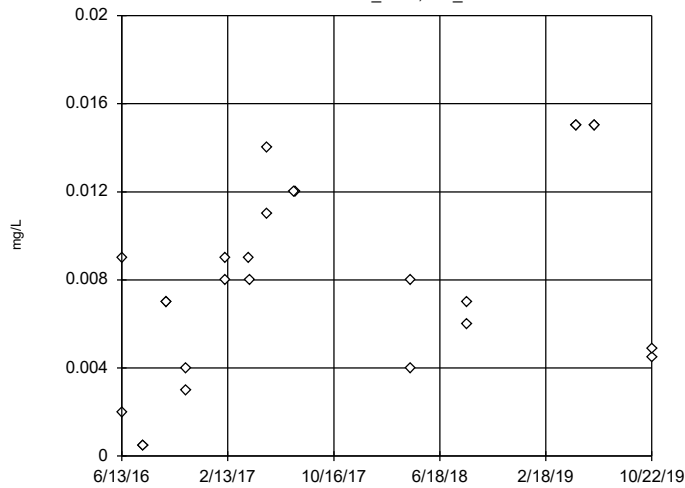


n = 26
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 27.03, low cutoff = 2.1e-9, based on IQR multiplier of 3.

Constituent: Lead, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

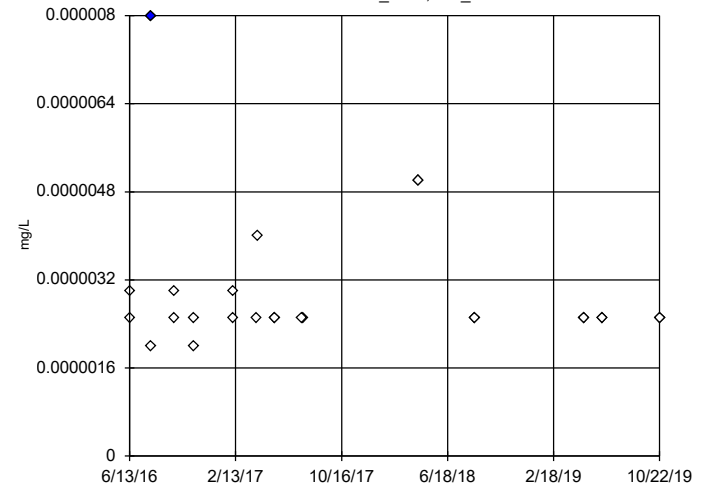


n = 26
 No outliers found.
 Tukey's method selected by user.
 Ladder of Powers transformations did not improve normality, analysis run on raw data.
 High cutoff = 0.03528, low cutoff = -0.01904, based on IQR multiplier of 3.

Constituent: Lithium, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

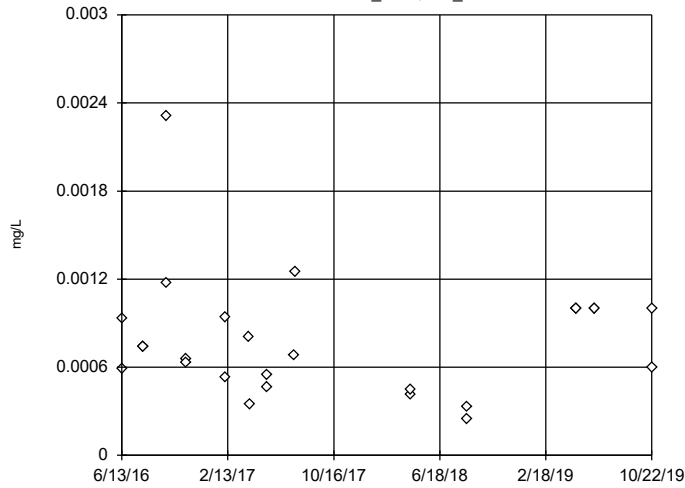


n = 26
 Outlier is drawn as solid.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.000005184, low cutoff = 0.000001447, based on IQR multiplier of 3.

Constituent: Mercury, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

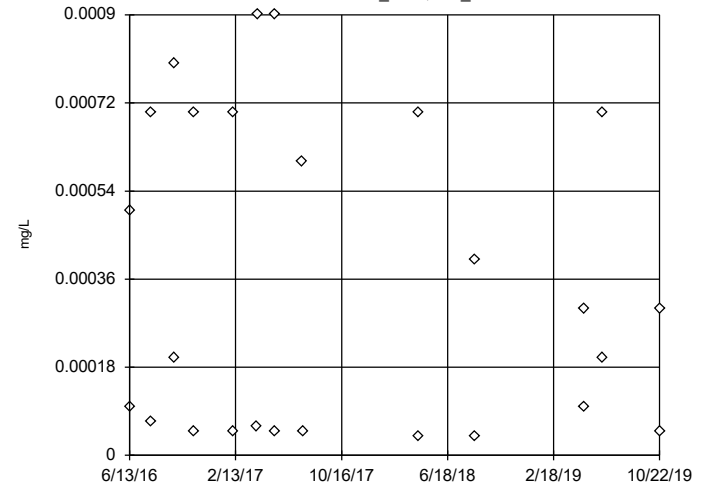


n = 26
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.008307, low cutoff = 0.0005944, based on IQR multiplier of 3.

Constituent: Molybdenum, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

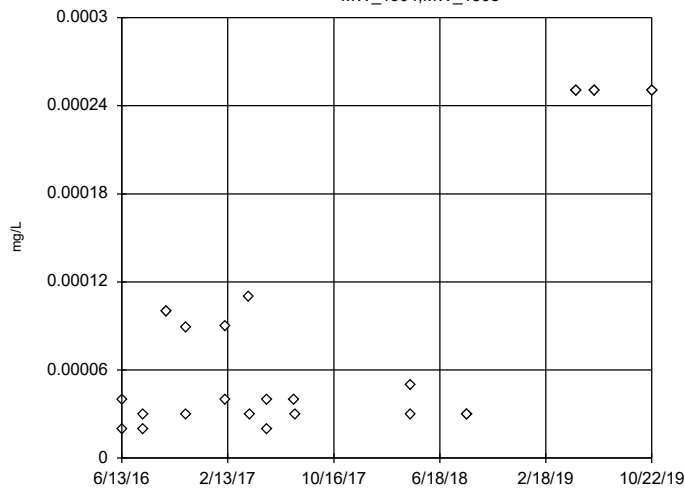


n = 26
 No outliers found.
 Tukey's method selected by user.
 Data were cube root transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.01464, low cutoff = -0.001686, based on IQR multiplier of 3.

Constituent: Selenium, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening, Pooled Background

MW_1504,MW_1508

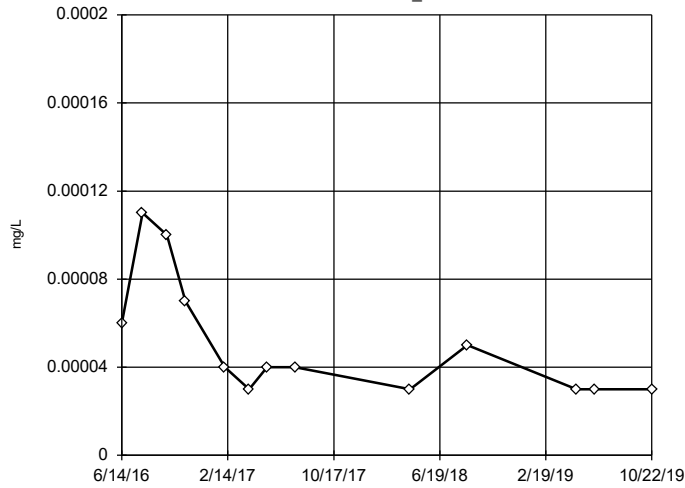


n = 26
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.02801, low cutoff = 1.8e-7, based on IQR multiplier of 3.

Constituent: Thallium, total Analysis Run 12/23/2019 12:39 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1505

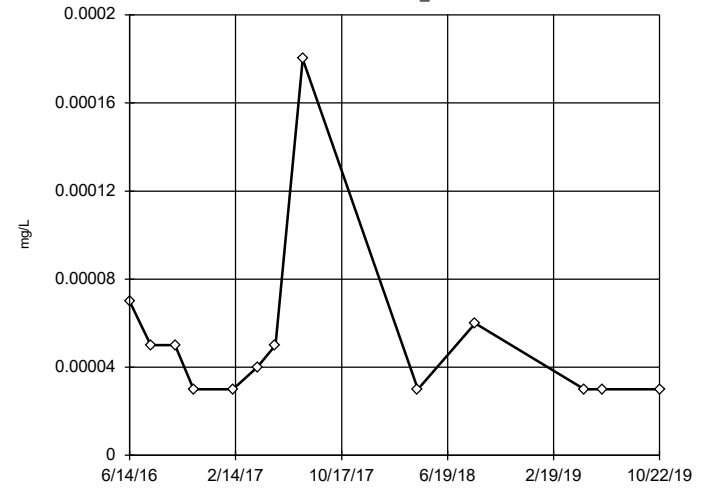


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.0006533, low cutoff = 0.00002976, based on IQR multiplier of 3.

Constituent: Antimony, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1506

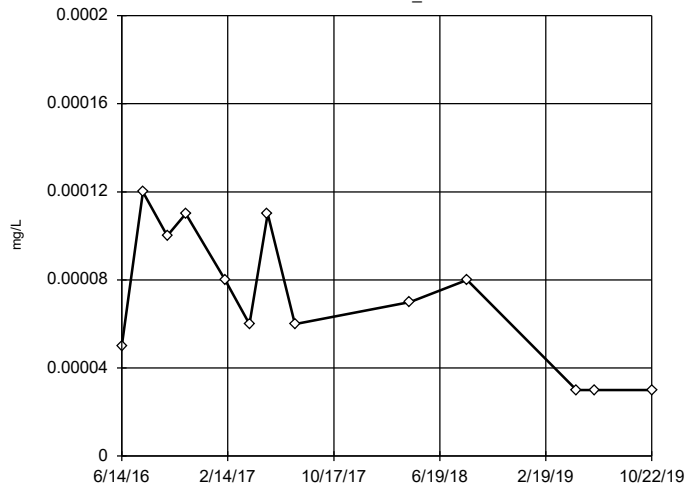


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.0003333, low cutoff = 0.0000493, based on IQR multiplier of 3.

Constituent: Antimony, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1507

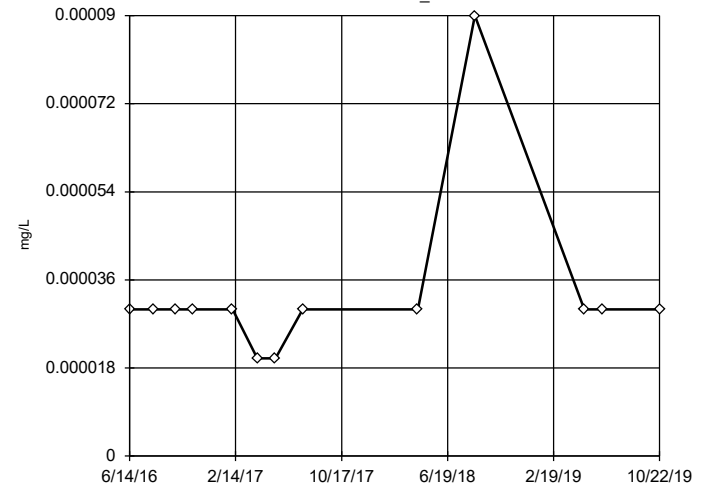


n = 13
 No outliers found.
 Tukey's method selected by user.
 Ladder of Powers transformations did not improve normality, analysis run on raw data.
 High cutoff = 0.00003, low cutoff = -0.000155, based on IQR multiplier of 3.

Constituent: Antimony, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

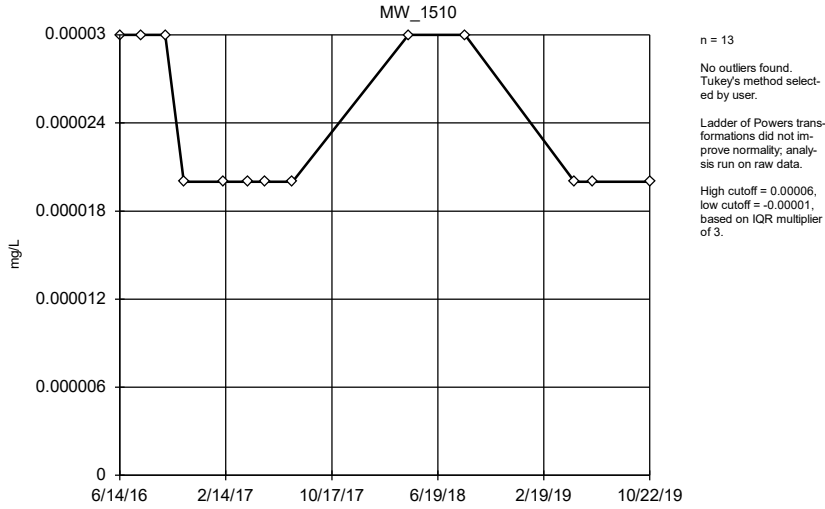
MW_1509



n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 The results were invalidated, because the lower and upper quartiles are equal.

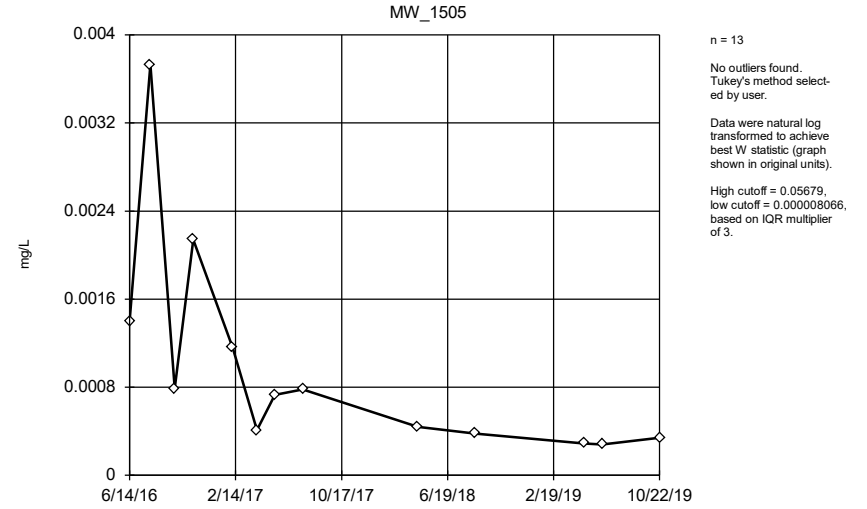
Constituent: Antimony, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening



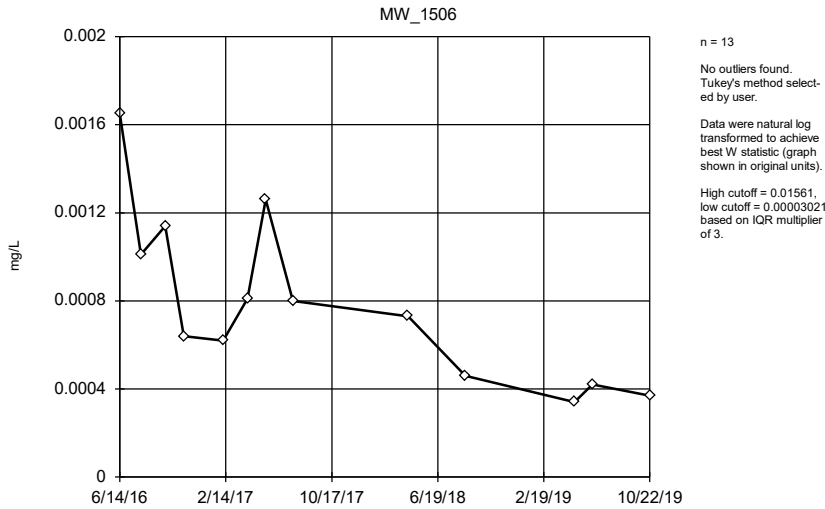
Constituent: Antimony, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening



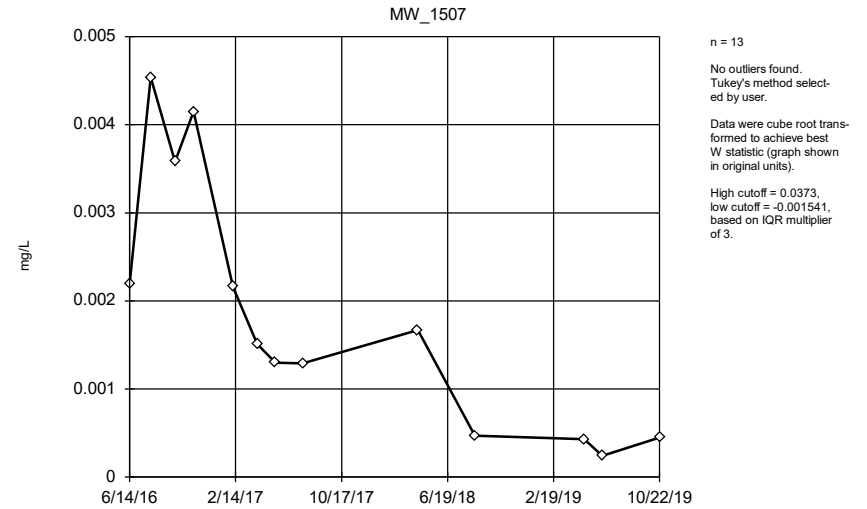
Constituent: Arsenic, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening



Constituent: Arsenic, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

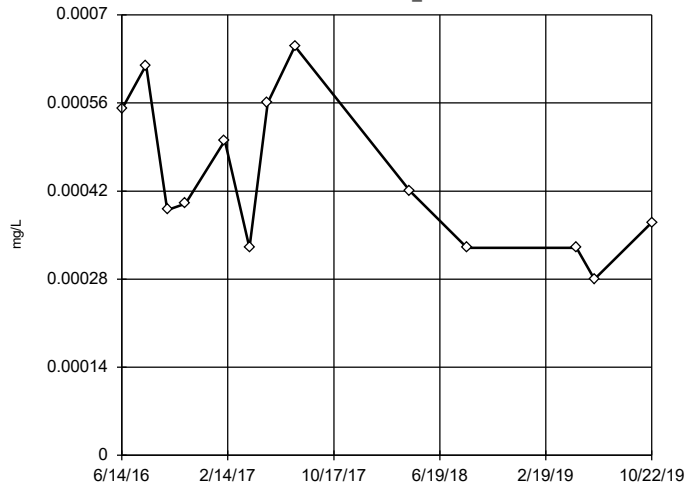
Tukey's Outlier Screening



Constituent: Arsenic, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1509

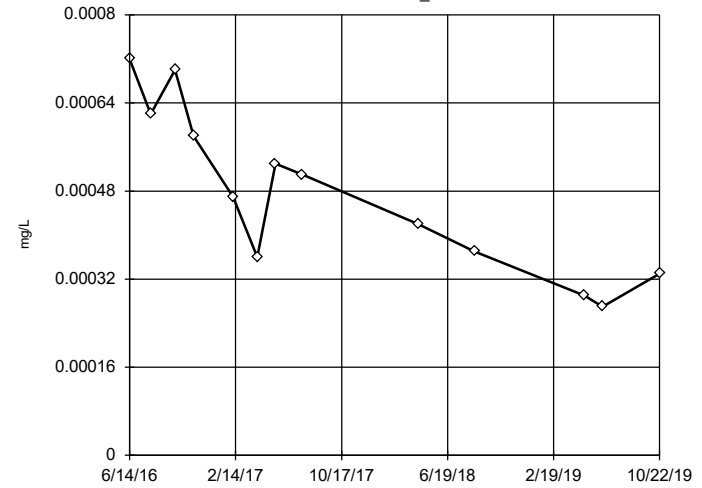


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.00264,
 low cutoff = 0.00006938,
 based on IQR multiplier of 3.

Constituent: Arsenic, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1510

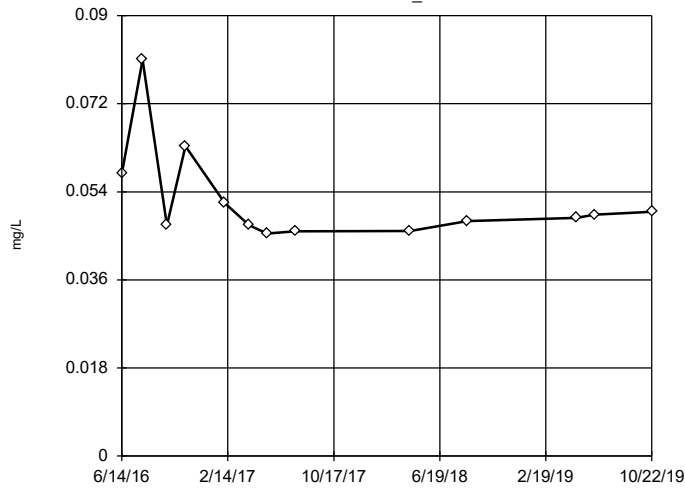


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were cube root transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.002047,
 low cutoff = 0.00002076,
 based on IQR multiplier of 3.

Constituent: Arsenic, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1505

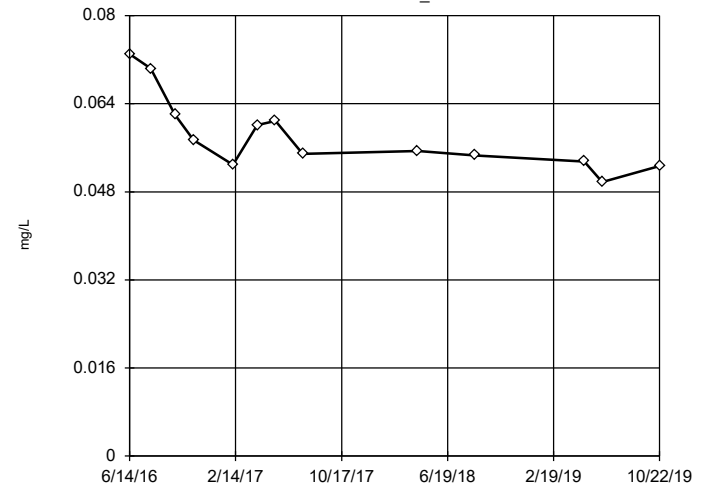


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.08796,
 low cutoff = 0.02893,
 based on IQR multiplier of 3.

Constituent: Barium, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1506

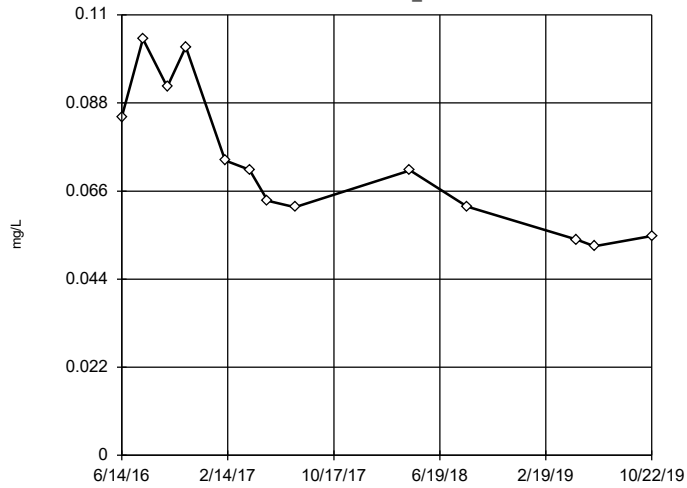


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.09469,
 low cutoff = 0.03452,
 based on IQR multiplier of 3.

Constituent: Barium, total Analysis Run 12/23/2019 12:40 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1507



n = 13

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

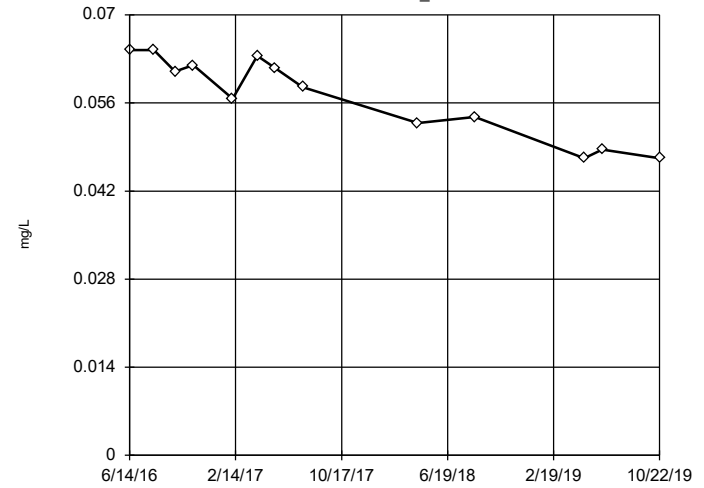
Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.3052,
low cutoff = 0.01684,
based on IQR multiplier of 3.

Constituent: Barium, total Analysis Run 12/23/2019 12:40 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1509



n = 13

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

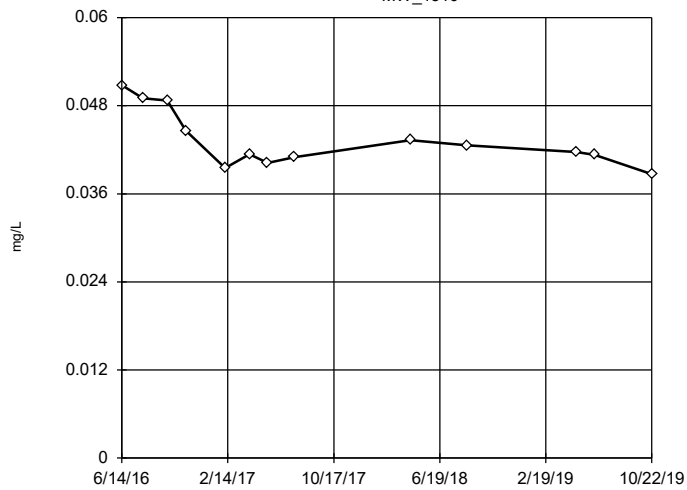
Data were x⁵ transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.07793,
low cutoff = -0.06896,
based on IQR multiplier of 3.

Constituent: Barium, total Analysis Run 12/23/2019 12:40 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1510



n = 13

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

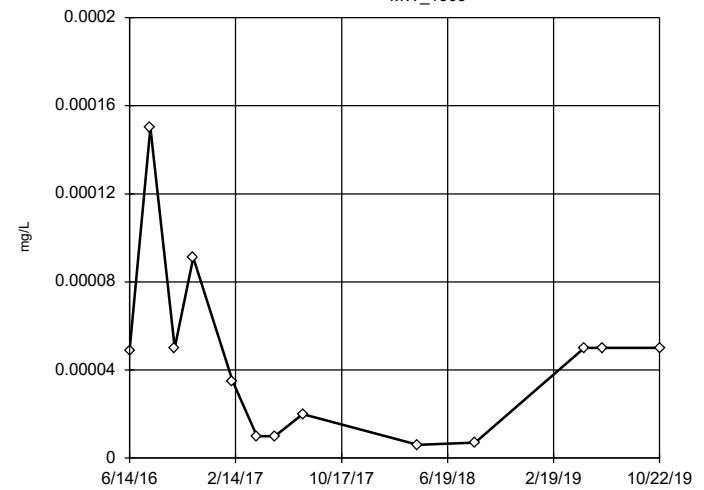
Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.0705,
low cutoff = 0.02684,
based on IQR multiplier of 3.

Constituent: Barium, total Analysis Run 12/23/2019 12:40 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1505



n = 13

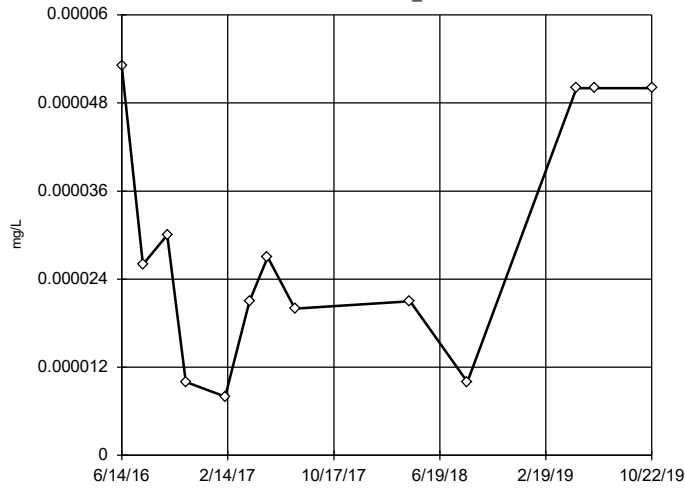
No outliers found.
Tukey's method selected by user.

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

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

Constituent: Beryllium, total Analysis Run 12/23/2019 12:40 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

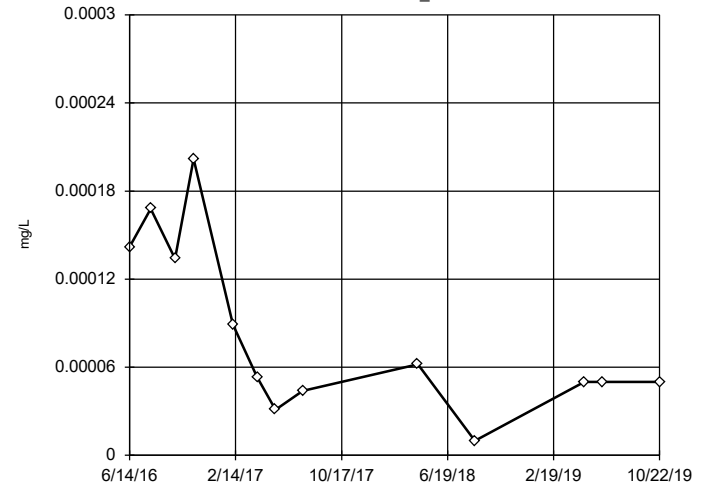
Tukey's Outlier Screening
MW_1506



n = 13
No outliers found.
Tukey's method selected by user.
Data were cube root transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.0004106, low cutoff = -0.00002271, based on IQR multiplier of 3.

Constituent: Beryllium, total Analysis Run 12/23/2019 12:40 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

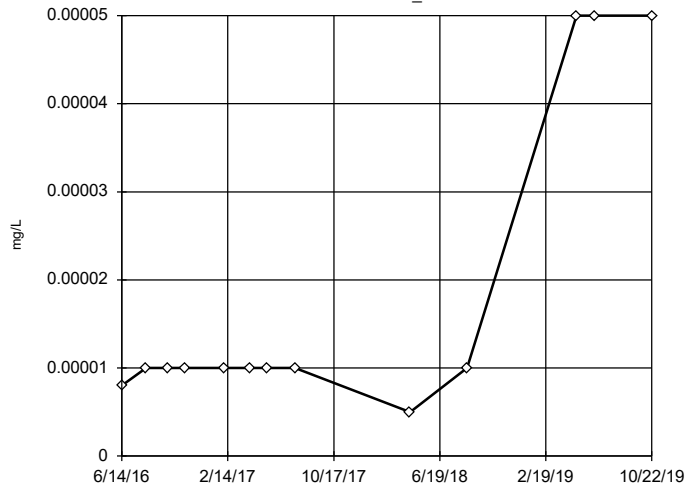
Tukey's Outlier Screening
MW_1507



n = 13
No outliers found.
Tukey's method selected by user.
Data were cube root transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.0009548, low cutoff = -0.00001234, based on IQR multiplier of 3.

Constituent: Beryllium, total Analysis Run 12/23/2019 12:40 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

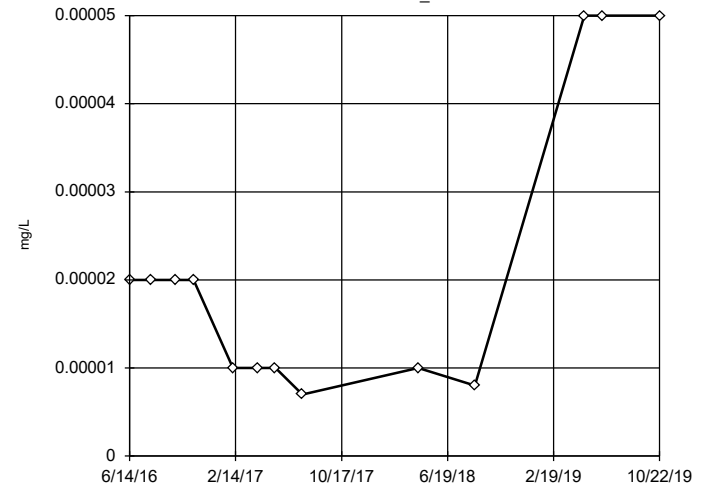
Tukey's Outlier Screening
MW_1509



n = 13
No outliers found.
Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.000025, low cutoff = 8.9e-7, based on IQR multiplier of 3.

Constituent: Beryllium, total Analysis Run 12/23/2019 12:40 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening
MW_1510

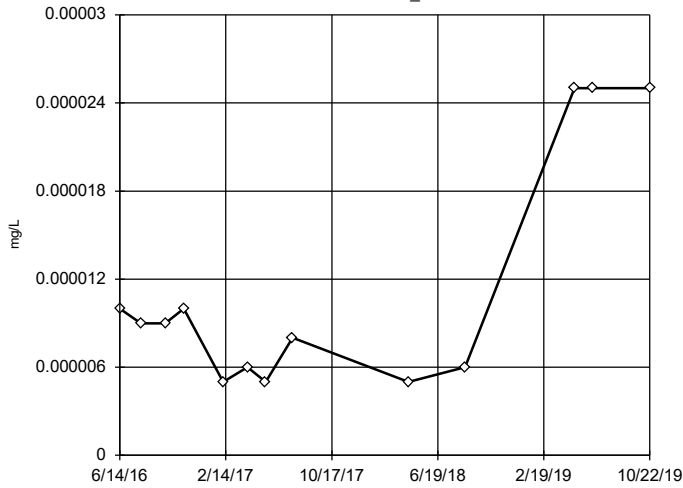


n = 13
No outliers found.
Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.001, low cutoff = 3.2e-7, based on IQR multiplier of 3.

Constituent: Beryllium, total Analysis Run 12/23/2019 12:40 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1510

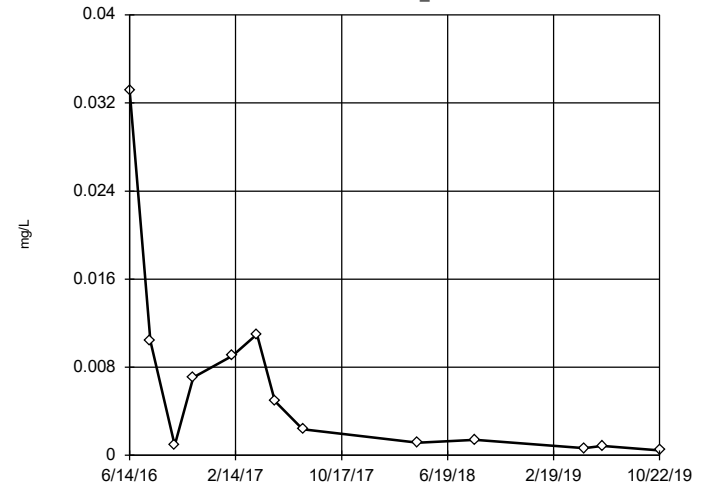


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.0003804, low cutoff = 2.3e-7, based on IQR multiplier of 3.

Constituent: Cadmium, total Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1505

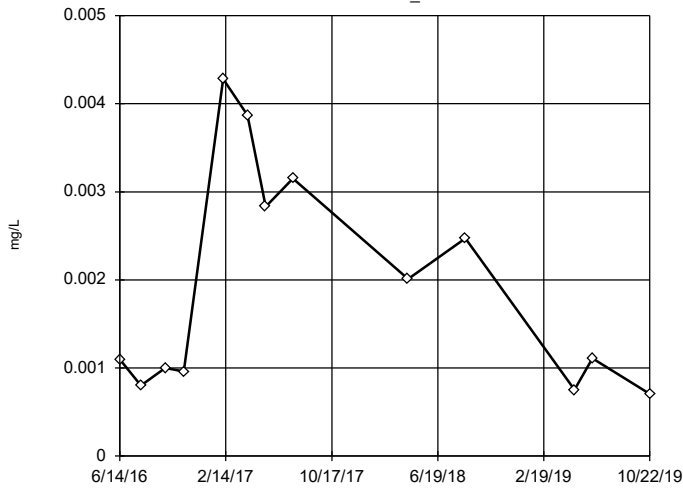


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 13.29, low cutoff = 6.4e-7, based on IQR multiplier of 3.

Constituent: Chromium, total Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1506

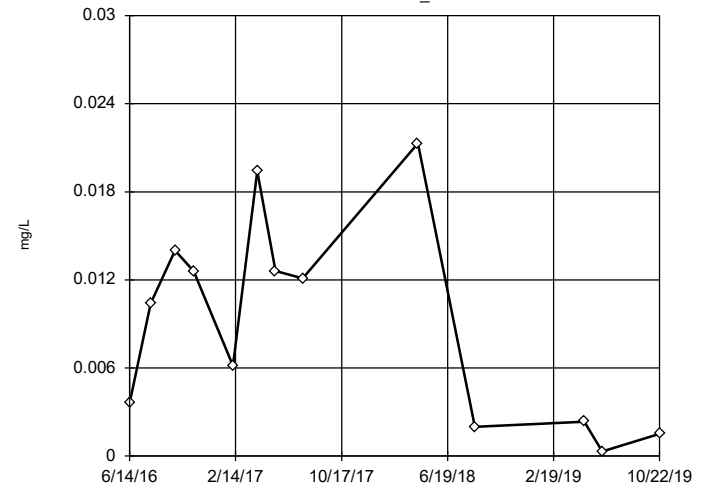


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.1183, low cutoff = 0.00002211, based on IQR multiplier of 3.

Constituent: Chromium, total Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1507

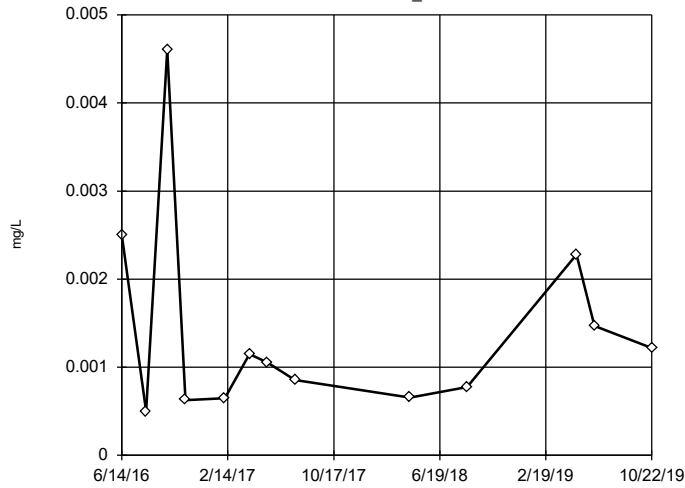


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were square root transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.1033, low cutoff = -0.02543, based on IQR multiplier of 3.

Constituent: Chromium, total Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1509

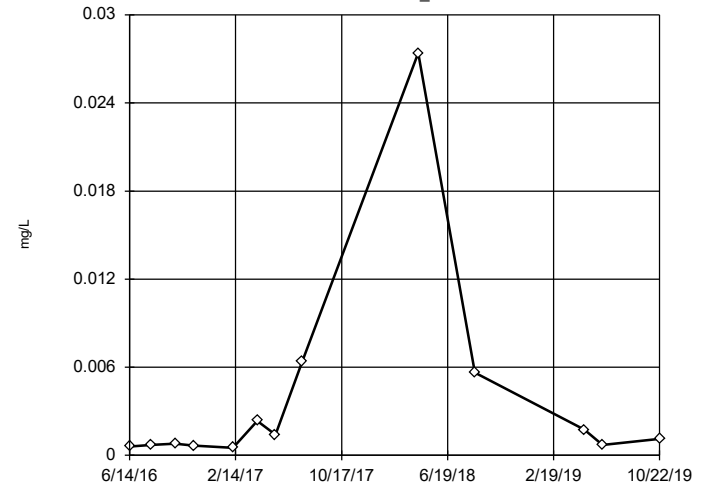


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.04025,
 low cutoff = 0.00002972,
 based on IQR multiplier of 3.

Constituent: Chromium, total Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1510

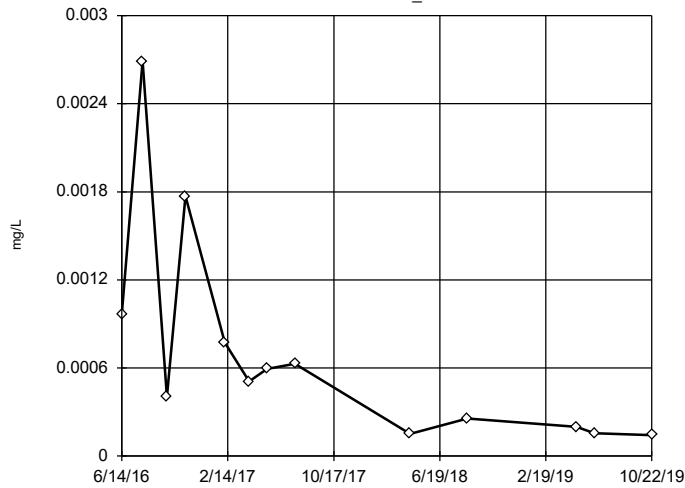


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.5646,
 low cutoff = 0.00004347,
 based on IQR multiplier of 3.

Constituent: Chromium, total Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1505

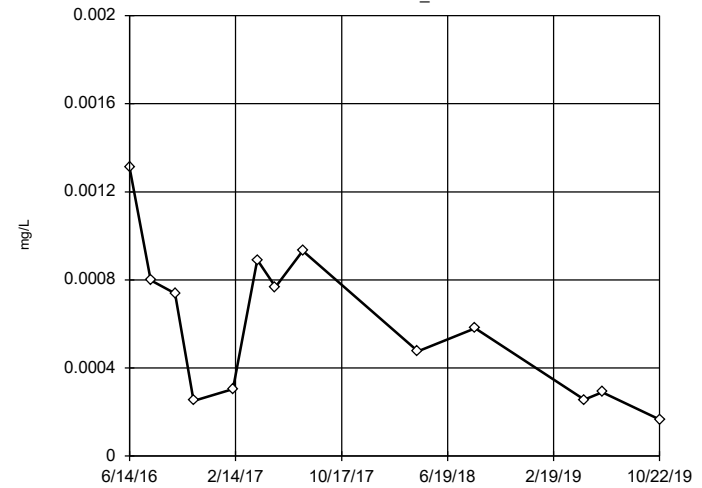


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.1027,
 low cutoff = 0.000001477,
 based on IQR multiplier of 3.

Constituent: Cobalt, total Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

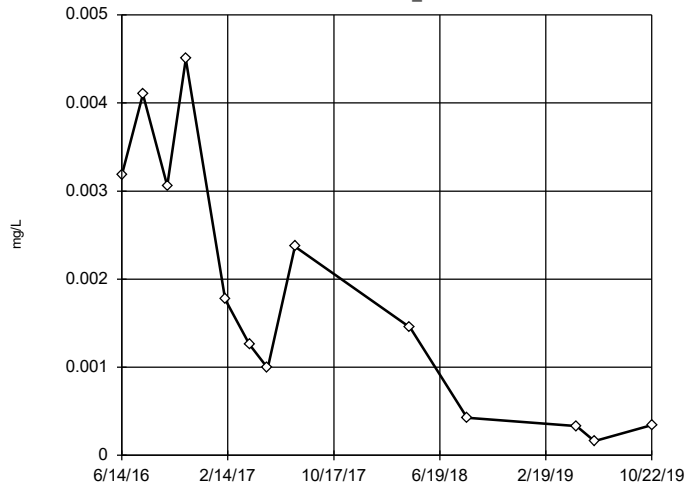
MW_1506



n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were square root transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.004447,
 low cutoff = -0.0004459,
 based on IQR multiplier of 3.

Constituent: Cobalt, total Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

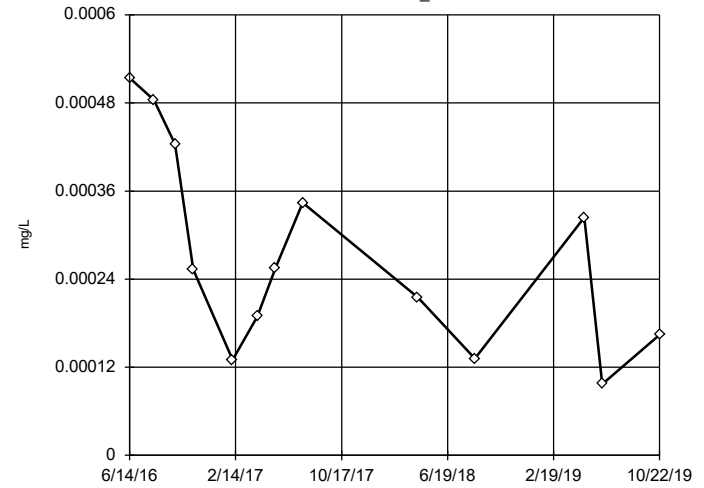
Tukey's Outlier Screening
MW_1507



n = 13
No outliers found. Tukey's method selected by user.
Data were cube root transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.04927, low cutoff = -0.003233, based on IQR multiplier of 3.

Constituent: Cobalt, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

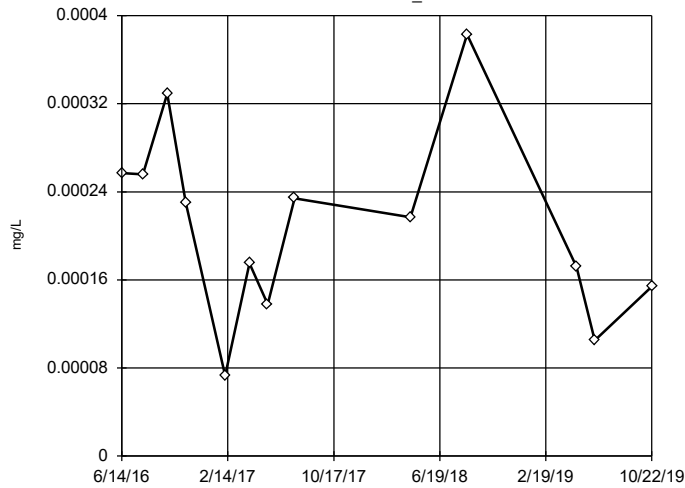
Tukey's Outlier Screening
MW_1509



n = 13
No outliers found. Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.006679, low cutoff = 0.00008413, based on IQR multiplier of 3.

Constituent: Cobalt, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

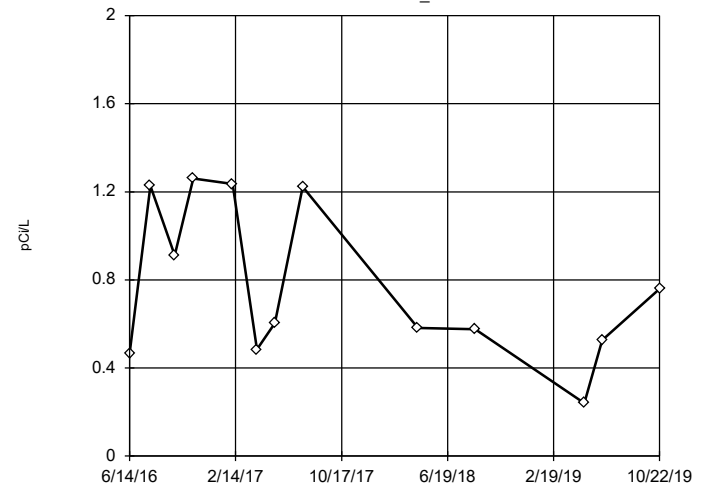
Tukey's Outlier Screening
MW_1510



n = 13
No outliers found. Tukey's method selected by user.
Data were square root transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.0007743, low cutoff = 7.1e-8, based on IQR multiplier of 3.

Constituent: Cobalt, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening
MW_1505

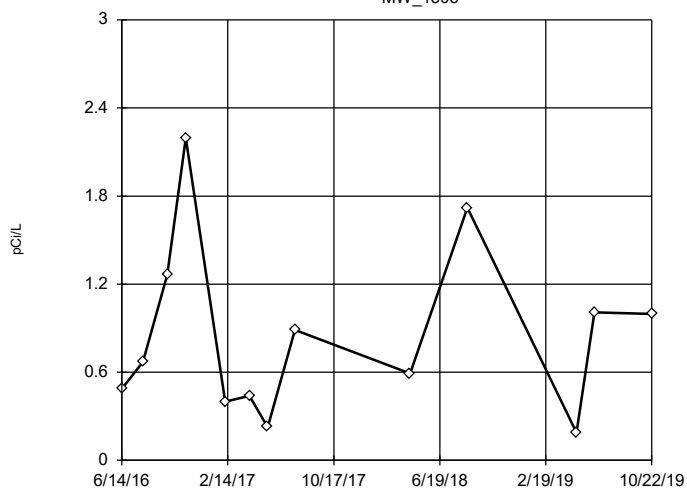


n = 13
No outliers found. Tukey's method selected by user.
Data were cube root transformed to achieve best W statistic (graph shown in original units).
High cutoff = 6.759, low cutoff = -0.00001491, based on IQR multiplier of 3.

Constituent: Combined Radium 226 + 228 Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1506

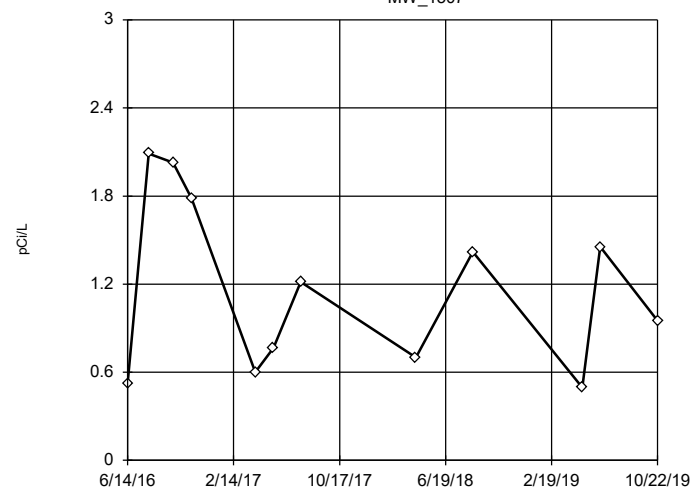


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 22.08, low cutoff = 0.02142, based on IQR multiplier of 3.

Constituent: Combined Radium 226 + 228 Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1507

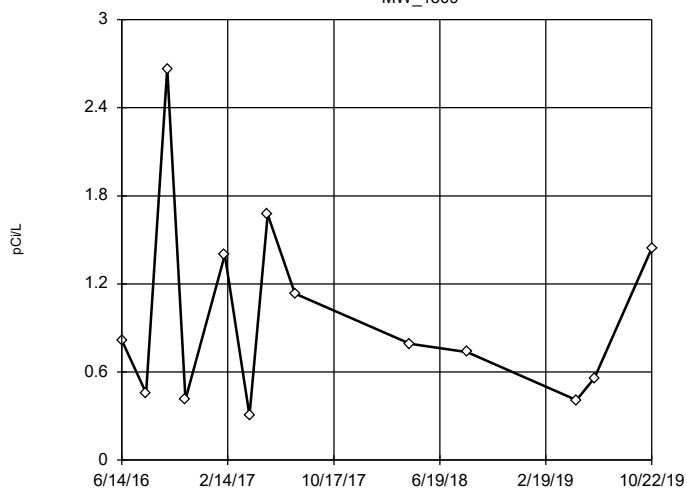


n = 12
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 24.67, low cutoff = 0.04234, based on IQR multiplier of 3.

Constituent: Combined Radium 226 + 228 Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1509

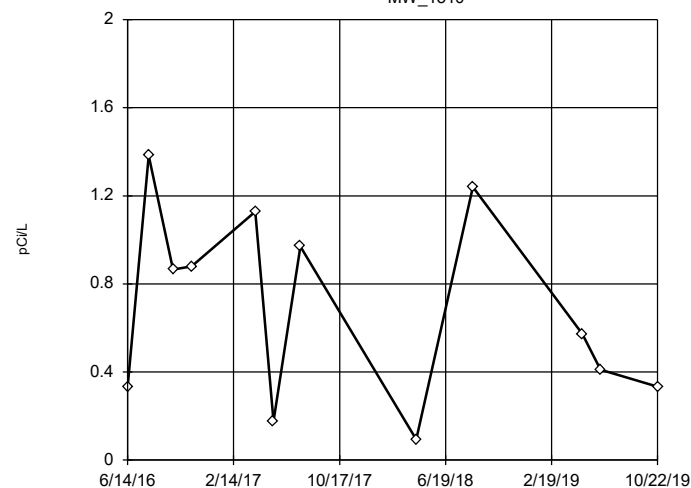


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 49.78, low cutoff = 0.01237, based on IQR multiplier of 3.

Constituent: Combined Radium 226 + 228 Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1510

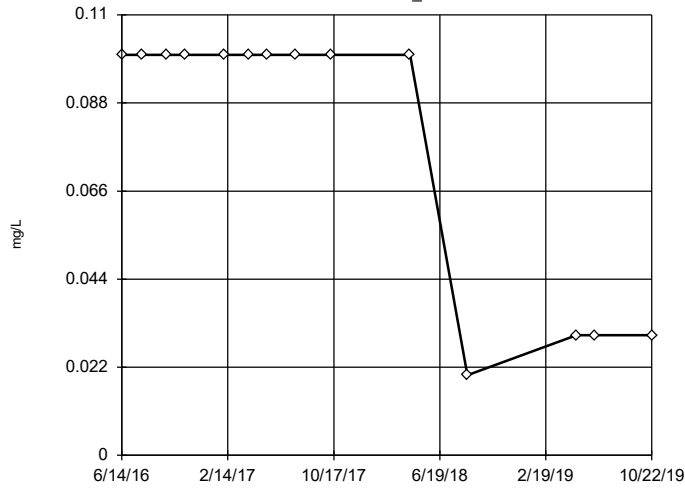


n = 12
 No outliers found.
 Tukey's method selected by user.
 Data were square root transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 5.596, low cutoff = -0.5866, based on IQR multiplier of 3.

Constituent: Combined Radium 226 + 228 Analysis Run 12/23/2019 12:41 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1505



n = 14

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

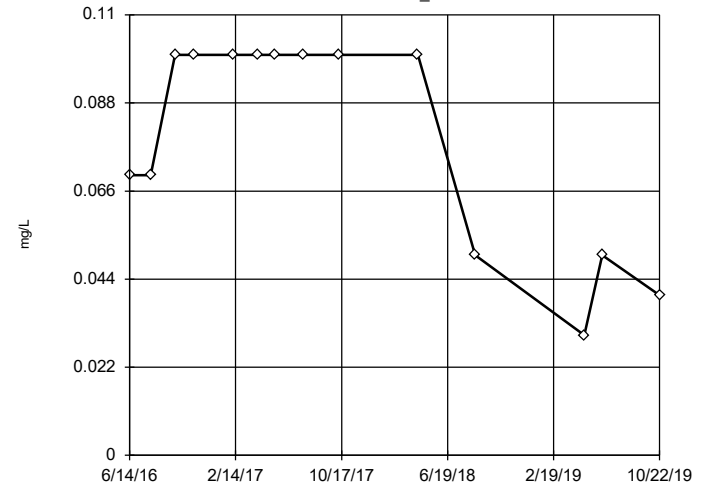
Data were natural log transformed to achieve best W statistic (graph shown in original units).

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

Constituent: Fluoride, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1506



n = 14

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

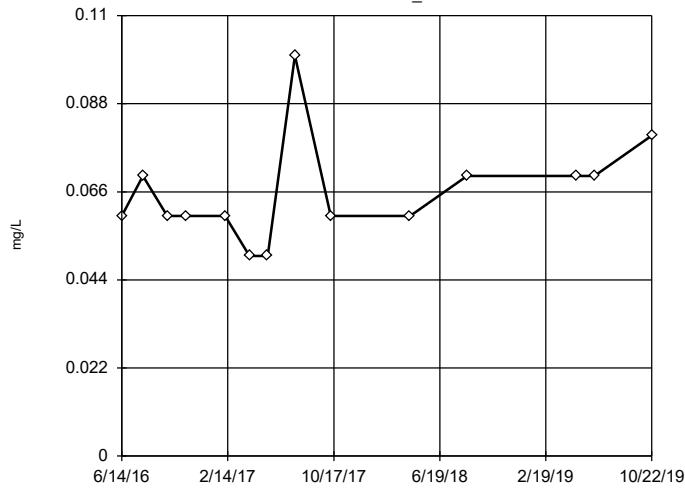
Data were cube root transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.4243, low cutoff = 0.0005341, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1507



n = 14

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

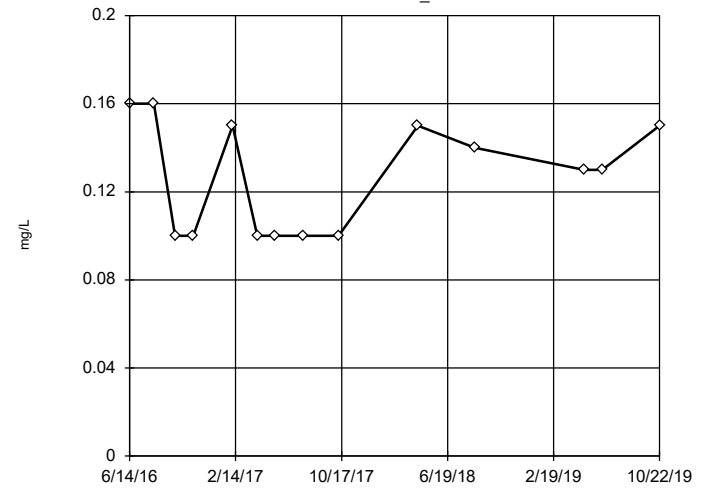
Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.1112, low cutoff = 0.03778, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1509



n = 14

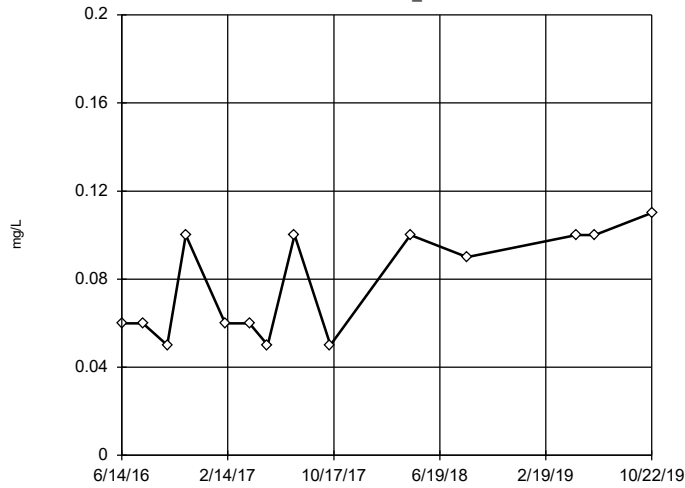
No outliers found. Tukey's method selected by user.

Data were x^4 transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.2038, low cutoff = -0.1829, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

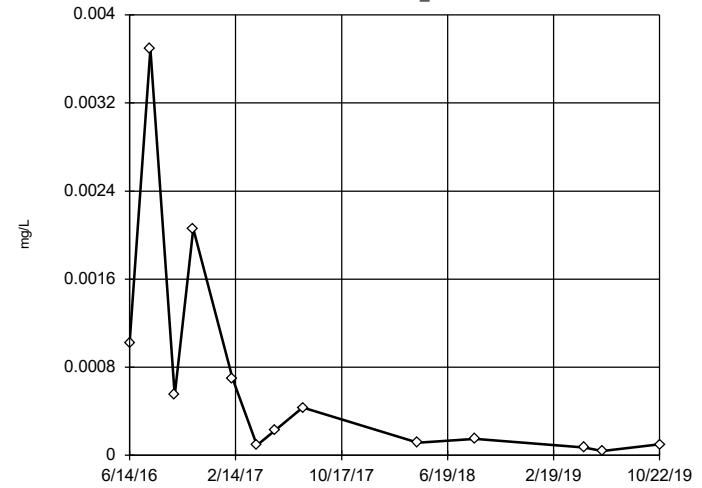
Tukey's Outlier Screening
MW_1510



n = 14
No outliers found. Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.6086, low cutoff = 0.009, based on IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

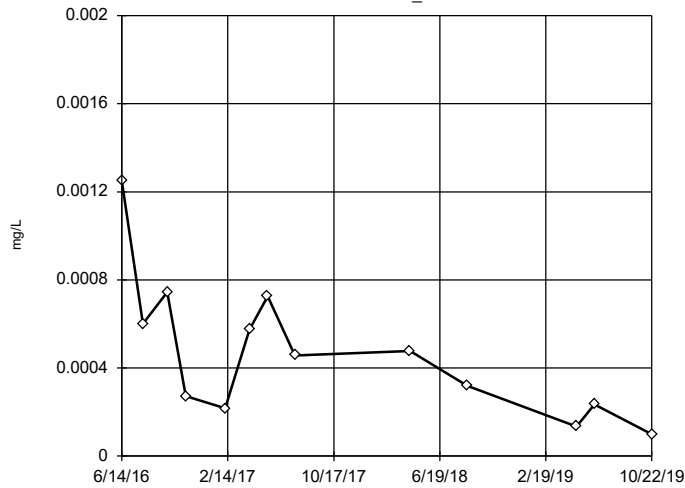
Tukey's Outlier Screening
MW_1505



n = 13
No outliers found. Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.5822, low cutoff = 1.4e-7, based on IQR multiplier of 3.

Constituent: Lead, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

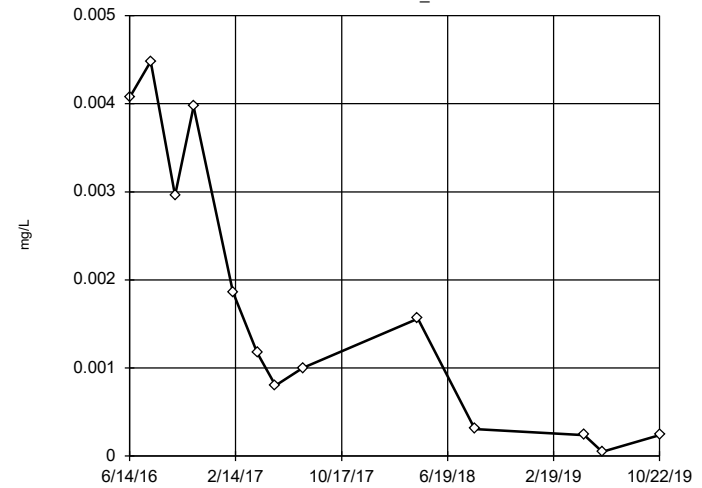
Tukey's Outlier Screening
MW_1506



n = 13
No outliers found. Tukey's method selected by user.
Data were cube root transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.004571, low cutoff = -0.000005803, based on IQR multiplier of 3.

Constituent: Lead, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

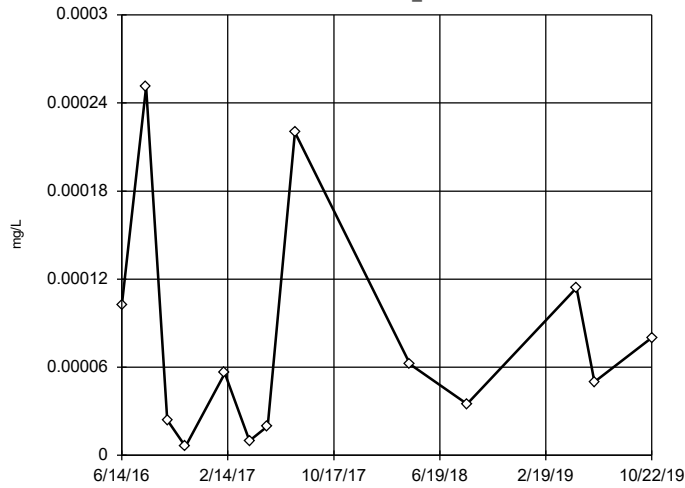
Tukey's Outlier Screening
MW_1507



n = 13
No outliers found. Tukey's method selected by user.
Data were cube root transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.06865, low cutoff = -0.007268, based on IQR multiplier of 3.

Constituent: Lead, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

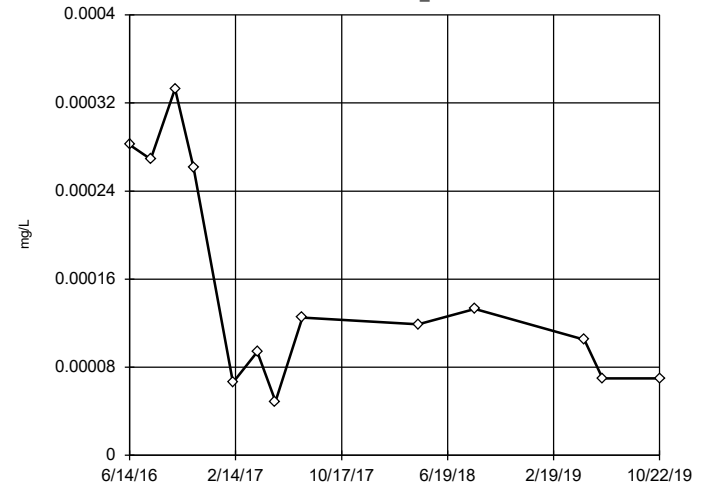
Tukey's Outlier Screening
MW_1509



n = 13
No outliers found.
Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.01286,
low cutoff = 1.8e-7, based on IQR multiplier of 3.

Constituent: Lead, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

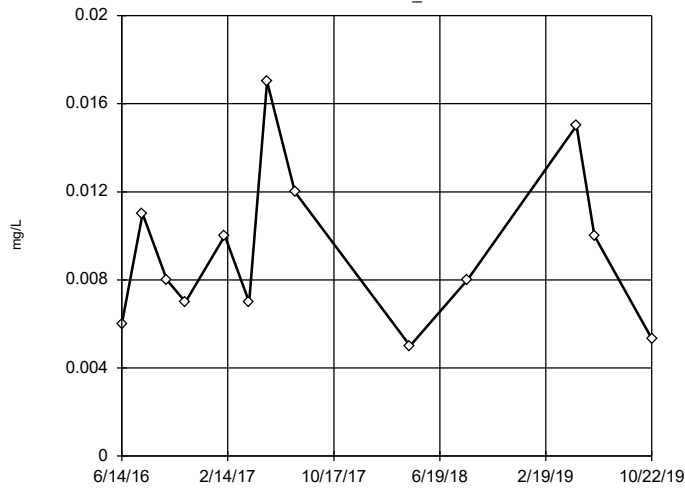
Tukey's Outlier Screening
MW_1510



n = 13
No outliers found.
Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.01437,
low cutoff = 0.000001291, based on IQR multiplier of 3.

Constituent: Lead, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

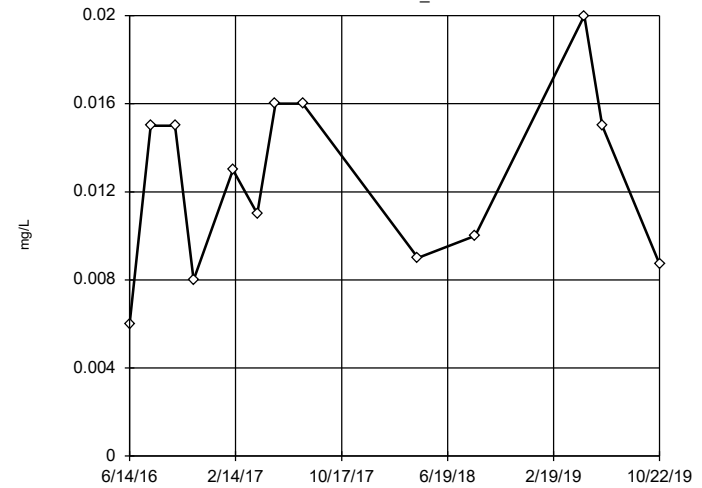
Tukey's Outlier Screening
MW_1505



n = 13
No outliers found.
Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.06401,
low cutoff = 0.001163, based on IQR multiplier of 3.

Constituent: Lithium, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening
MW_1506

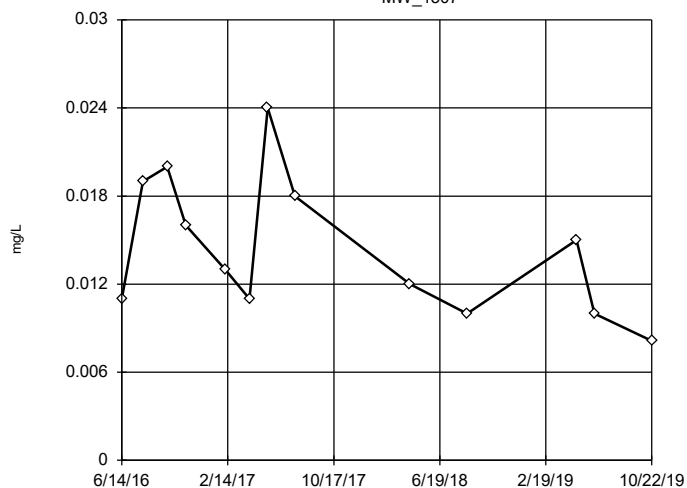


n = 13
No outliers found.
Tukey's method selected by user.
Data were square root transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.04643,
low cutoff = 0.000009968, based on IQR multiplier of 3.

Constituent: Lithium, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1507

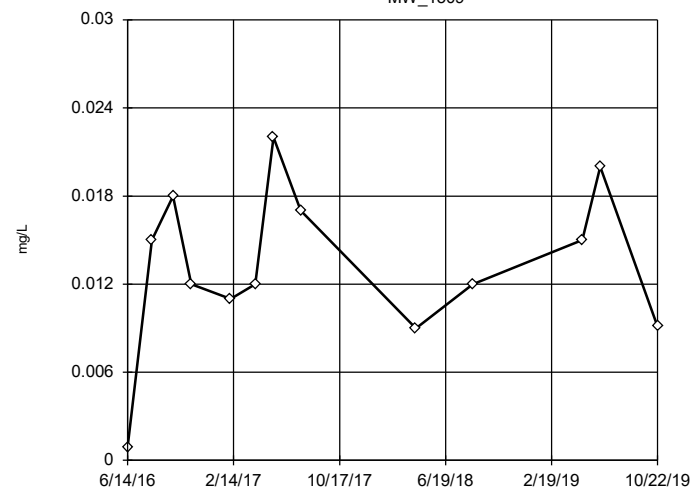


n = 13
No outliers found.
Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.1014,
low cutoff = 0.001913,
based on IQR multiplier of 3.

Constituent: Lithium, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1509

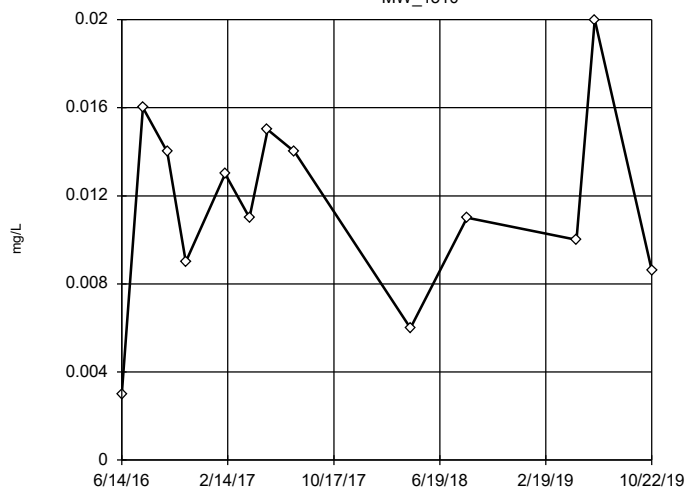


n = 13
No outliers found.
Tukey's method selected by user.
Ladder of Powers transformations did not improve normality; analysis run on raw data.
High cutoff = 0.03984,
low cutoff = -0.01228,
based on IQR multiplier of 3.

Constituent: Lithium, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1510

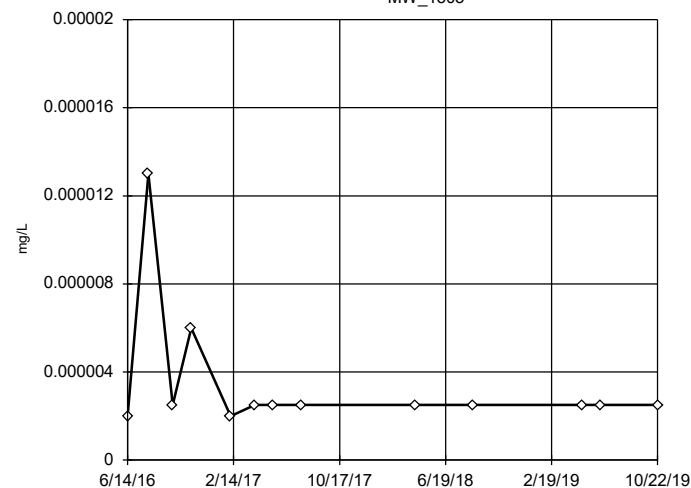


n = 13
No outliers found.
Tukey's method selected by user.
Ladder of Powers transformations did not improve normality; analysis run on raw data.
High cutoff = 0.03157,
low cutoff = -0.00826,
based on IQR multiplier of 3.

Constituent: Lithium, total Analysis Run 12/23/2019 12:41 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1505

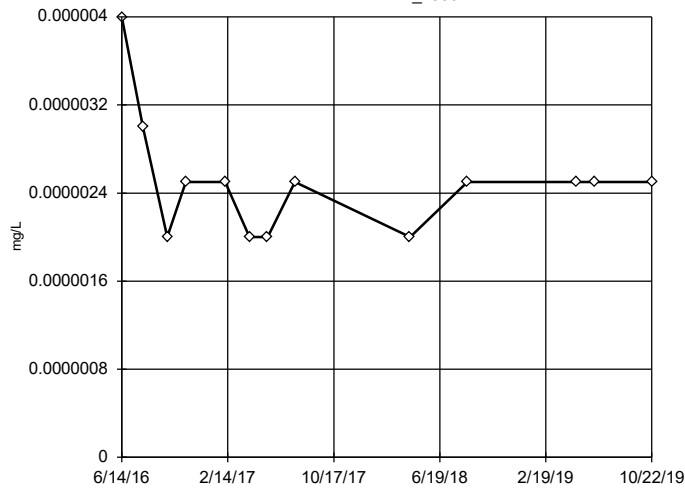


n = 13
No outliers found.
Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
The results were invalidated, because the lower and upper quartiles are equal.

Constituent: Mercury, total Analysis Run 12/23/2019 12:42 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1506

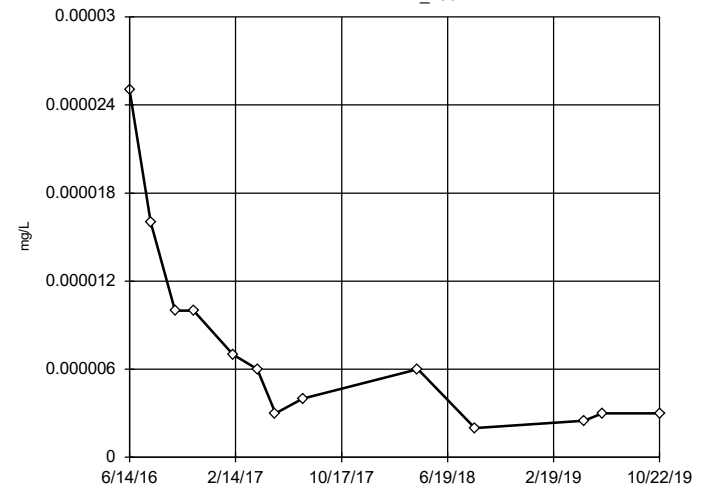


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.000004883,
 low cutoff = 0.000001024,
 based on IQR multiplier of 3.

Constituent: Mercury, total Analysis Run 12/23/2019 12:42 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1507

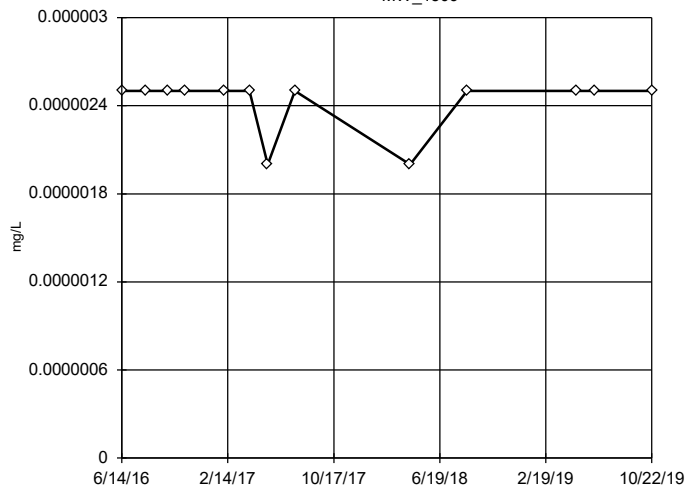


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.0003704,
 low cutoff = 8.1e-8, based on IQR multiplier of 3.

Constituent: Mercury, total Analysis Run 12/23/2019 12:42 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

MW_1509

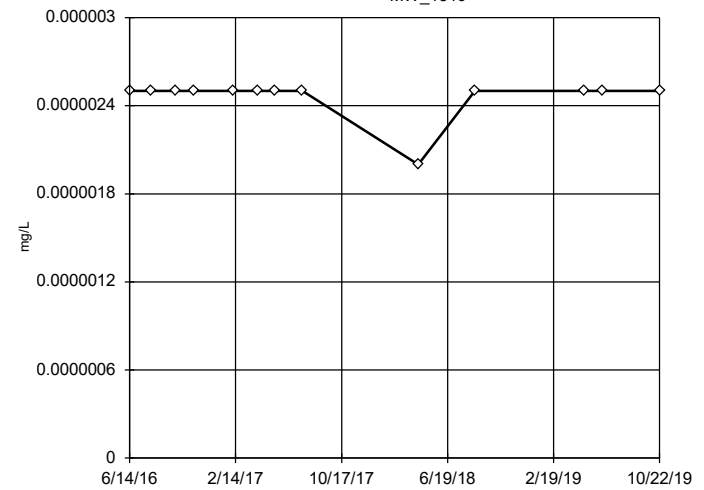


n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were square transformed to achieve best W statistic (graph shown in original units).
 The results were invalidated, because the lower and upper quartiles are equal.

Constituent: Mercury, total Analysis Run 12/23/2019 12:42 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening

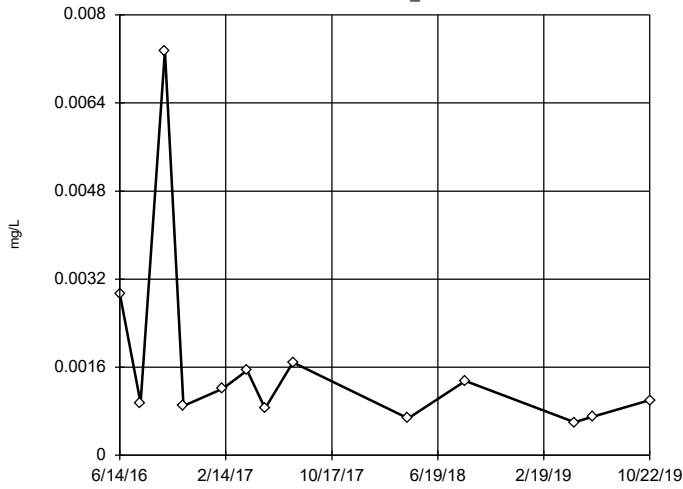
MW_1510



n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were square transformed to achieve best W statistic (graph shown in original units).
 The results were invalidated, because the lower and upper quartiles are equal.

Constituent: Mercury, total Analysis Run 12/23/2019 12:42 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

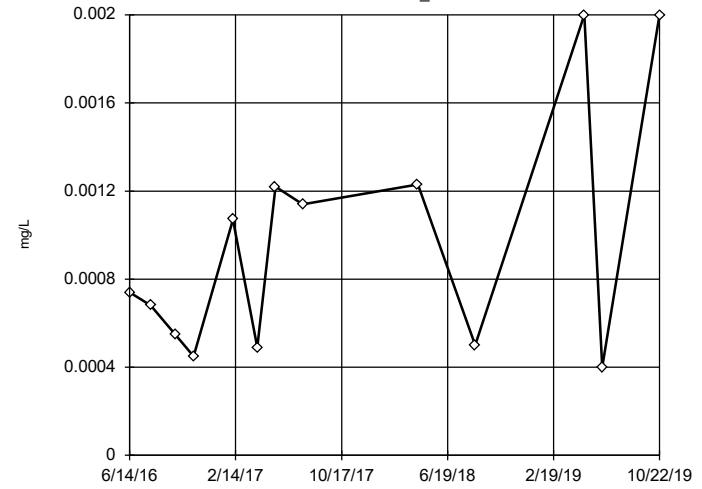
Tukey's Outlier Screening
MW_1505



n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.01476,
 low cutoff = 0.00008432,
 based on IQR multiplier of 3.

Constituent: Molybdenum, total Analysis Run 12/23/2019 12:42 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

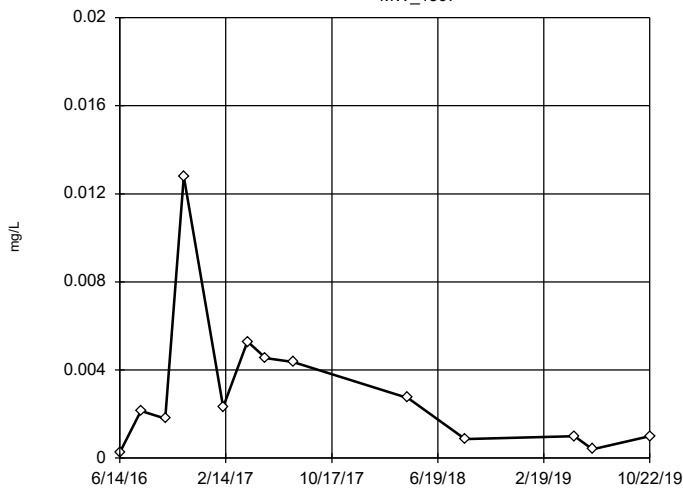
Tukey's Outlier Screening
MW_1506



n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.01857,
 low cutoff = 0.00003265,
 based on IQR multiplier of 3.

Constituent: Molybdenum, total Analysis Run 12/23/2019 12:42 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

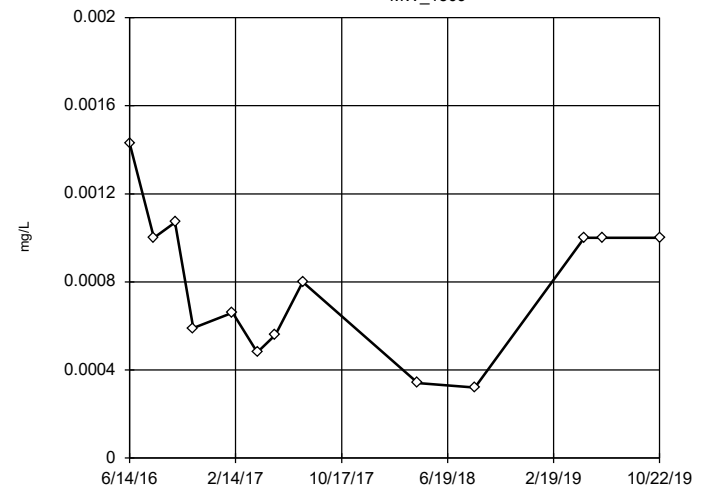
Tukey's Outlier Screening
MW_1507



n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were natural log transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.4851,
 low cutoff = 0.000008565,
 based on IQR multiplier of 3.

Constituent: Molybdenum, total Analysis Run 12/23/2019 12:42 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

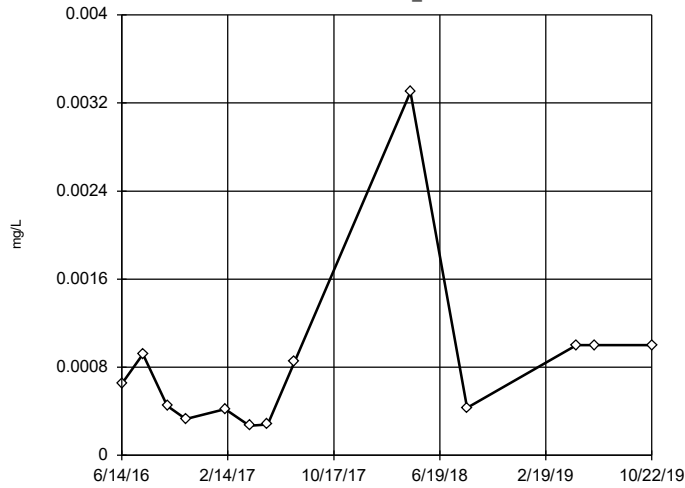
Tukey's Outlier Screening
MW_1509



n = 13
 No outliers found.
 Tukey's method selected by user.
 Data were square root transformed to achieve best W statistic (graph shown in original units).
 High cutoff = 0.003379,
 low cutoff = -0.00001385,
 based on IQR multiplier of 3.

Constituent: Molybdenum, total Analysis Run 12/23/2019 12:42 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

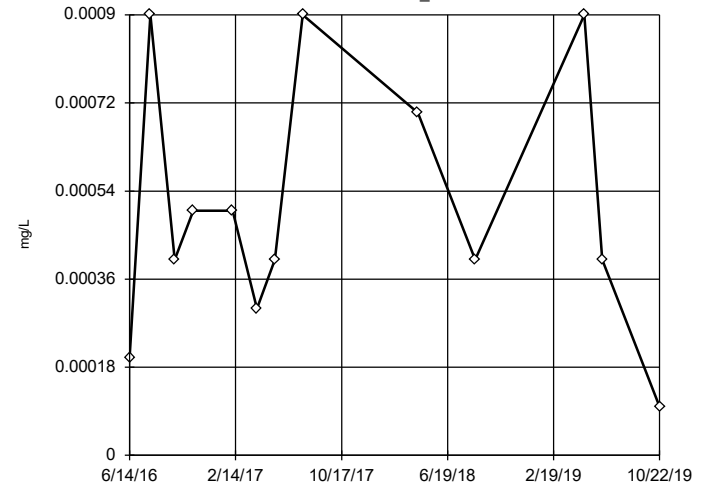
Tukey's Outlier Screening
MW_1510



n = 13
No outliers found.
Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.01938,
low cutoff = 0.00001921,
based on IQR multiplier of 3.

Constituent: Molybdenum, total Analysis Run 12/23/2019 12:42 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

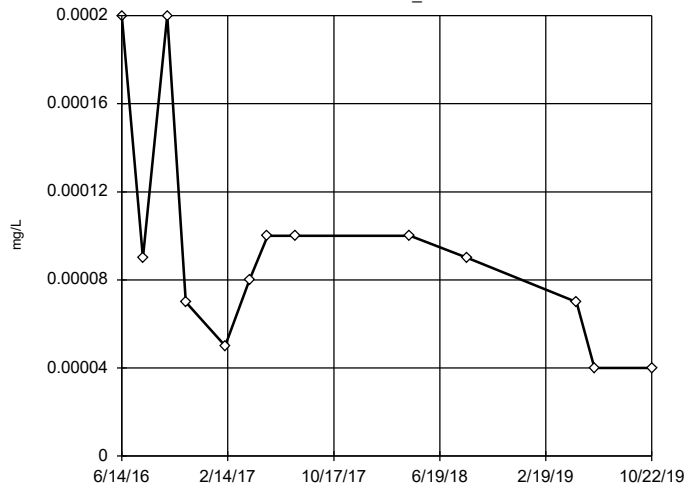
Tukey's Outlier Screening
MW_1505



n = 13
No outliers found.
Tukey's method selected by user.
Data were square root transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.003242,
low cutoff = -0.0001009,
based on IQR multiplier of 3.

Constituent: Selenium, total Analysis Run 12/23/2019 12:42 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

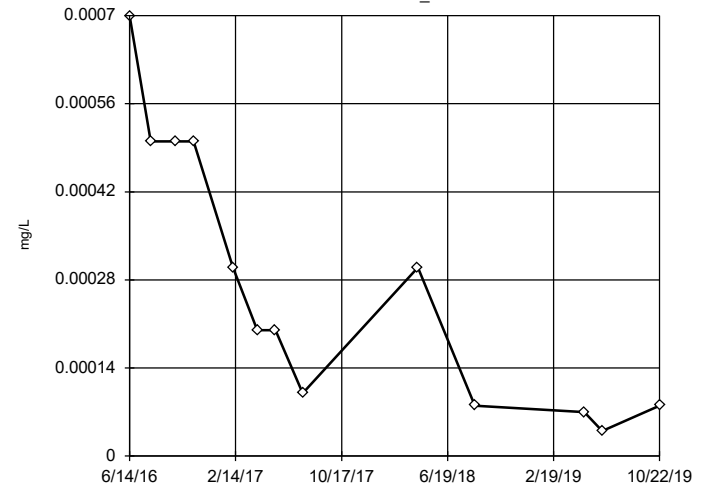
Tukey's Outlier Screening
MW_1506



n = 13
No outliers found.
Tukey's method selected by user.
Data were natural log transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.0004829,
low cutoff = 0.00001225,
based on IQR multiplier of 3.

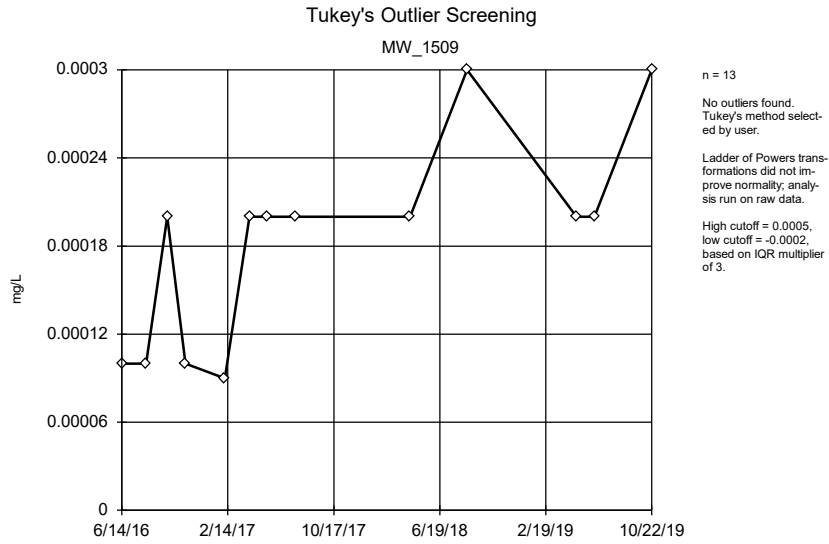
Constituent: Selenium, total Analysis Run 12/23/2019 12:42 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Tukey's Outlier Screening
MW_1507

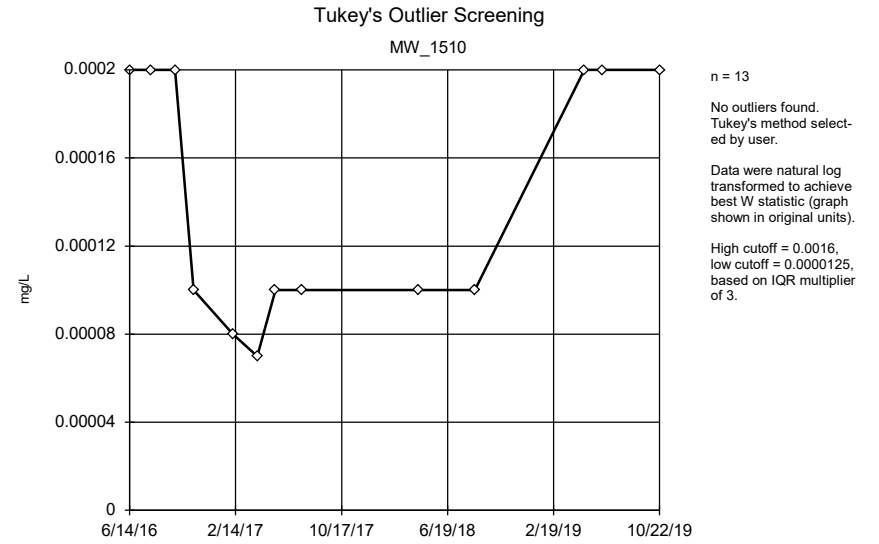


n = 13
No outliers found.
Tukey's method selected by user.
Data were cube root transformed to achieve best W statistic (graph shown in original units).
High cutoff = 0.006667,
low cutoff = -0.0002843,
based on IQR multiplier of 3.

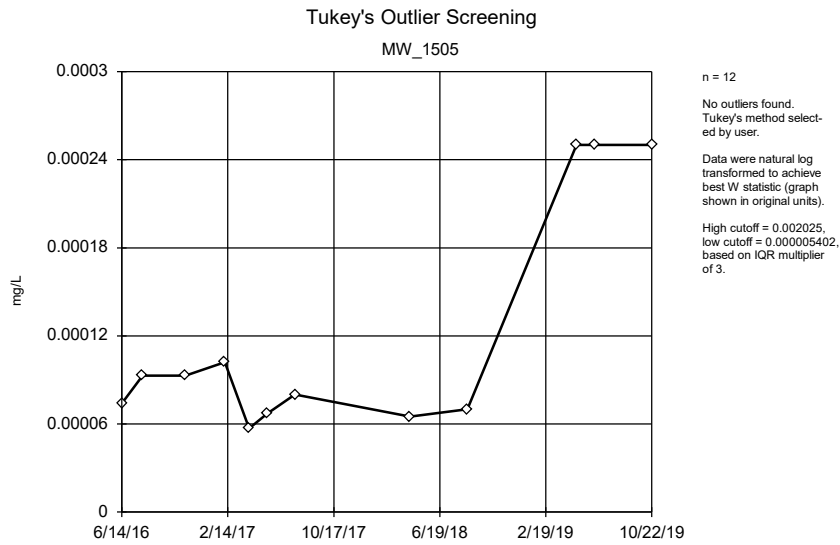
Constituent: Selenium, total Analysis Run 12/23/2019 12:42 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP



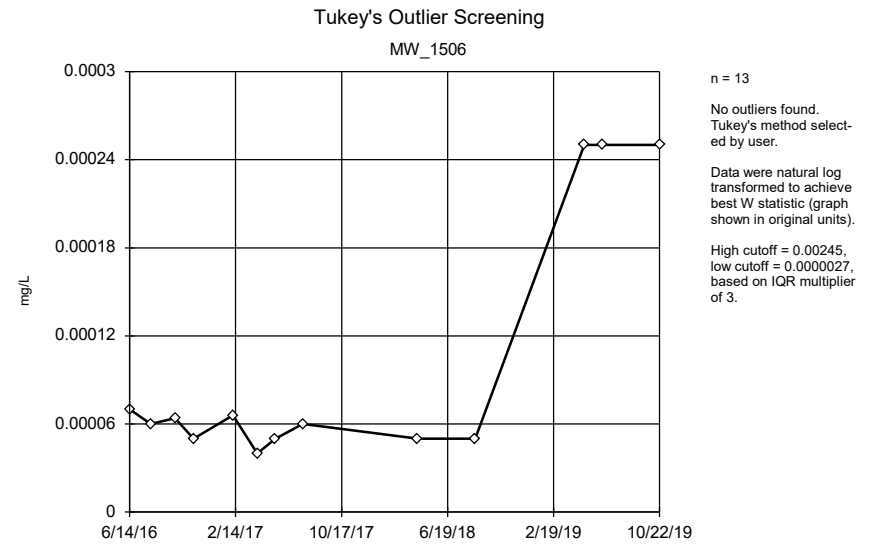
Constituent: Selenium, total Analysis Run 12/23/2019 12:42 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Selenium, total Analysis Run 12/23/2019 12:42 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Thallium, total Analysis Run 12/23/2019 12:42 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Thallium, total Analysis Run 12/23/2019 12:42 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Mann-Whitney - Significant Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/27/2019, 9:40 AM

| <u>Constituent</u> | <u>Well</u> | <u>Calc.</u> | <u>0.01</u> | <u>Method</u> |
|-----------------------|-------------|--------------|-------------|---------------|
| Sulfate, total (mg/L) | MW_1506 | 2.858 | Yes | Mann-W |
| Sulfate, total (mg/L) | MW_1509 | 2.866 | Yes | Mann-W |

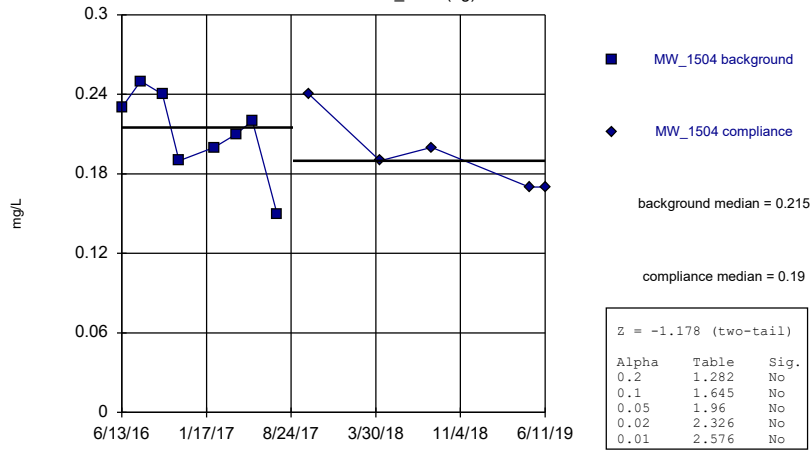
Mann-Whitney - All Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/27/2019, 9:40 AM

| <u>Constituent</u> | <u>Well</u> | <u>Calc.</u> | <u>0.01</u> | <u>Method</u> |
|------------------------------|----------------|--------------|-------------|---------------|
| Fluoride, total (mg/L) | MW_1504 (bg) | -1.178 | No | Mann-W |
| Fluoride, total (mg/L) | MW_1505 | -0.... | No | Mann-W |
| Fluoride, total (mg/L) | MW_1506 | -1.759 | No | Mann-W |
| Fluoride, total (mg/L) | MW_1507 | 1.096 | No | Mann-W |
| Fluoride, total (mg/L) | MW_1508 (bg) | -0.... | No | Mann-W |
| Fluoride, total (mg/L) | MW_1509 | 0.3867 | No | Mann-W |
| Fluoride, total (mg/L) | MW_1510 | 0.827 | No | Mann-W |
| Sulfate, total (mg/L) | MW_1504 (bg) | -1.319 | No | Mann-W |
| Sulfate, total (mg/L) | MW_1505 | 2.569 | No | Mann-W |
| Sulfate, total (mg/L) | MW_1506 | 2.858 | Yes | Mann-W |
| Sulfate, total (mg/L) | MW_1507 | 1.976 | No | Mann-W |
| Sulfate, total (mg/L) | MW_1508 (bg) | -0.... | No | Mann-W |
| Sulfate, total (mg/L) | MW_1509 | 2.866 | Yes | Mann-W |
| Sulfate, total (mg/L) | MW_1510 | 2.492 | No | Mann-W |

Mann-Whitney (Wilcoxon Rank Sum)

MW_1504 (bg)

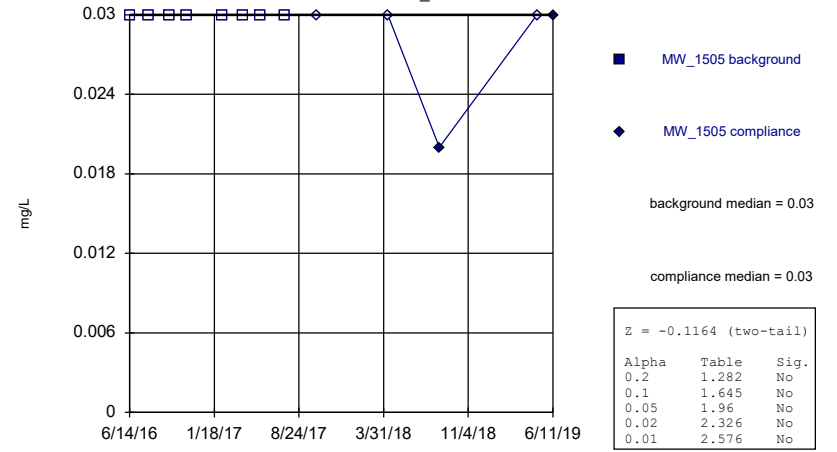


Constituent: Fluoride, total Analysis Run 12/27/2019 9:38 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Hollow symbols indicate censored values.

Mann-Whitney (Wilcoxon Rank Sum)

MW_1505

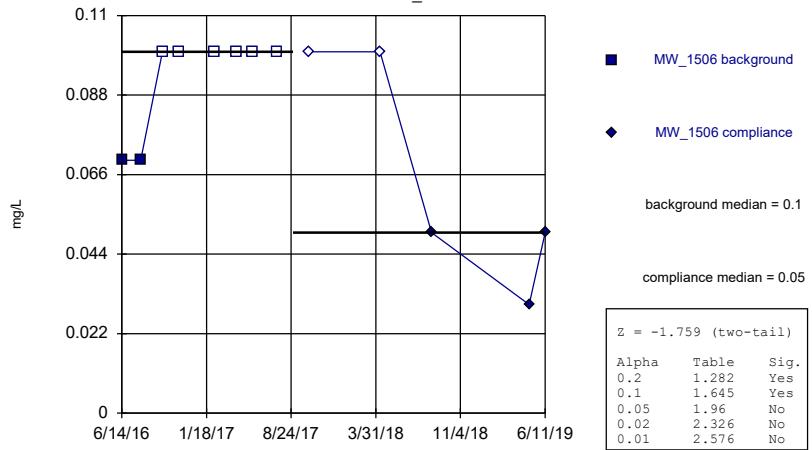


Constituent: Fluoride, total Analysis Run 12/27/2019 9:38 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Hollow symbols indicate censored values.

Mann-Whitney (Wilcoxon Rank Sum)

MW_1506

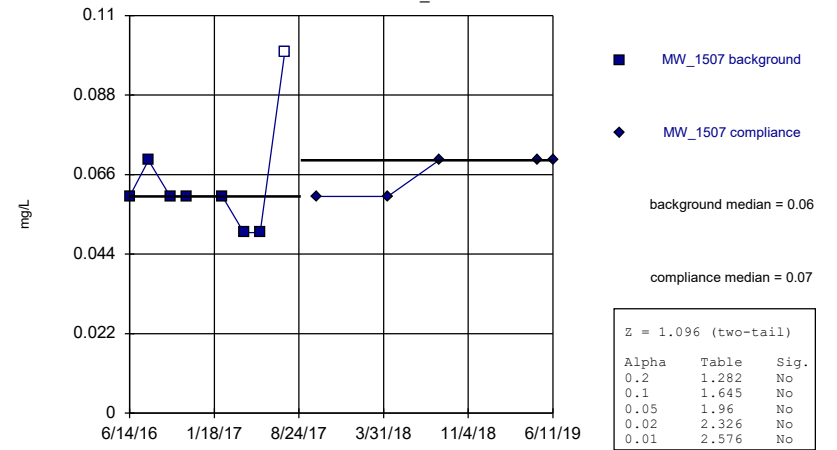


Constituent: Fluoride, total Analysis Run 12/27/2019 9:38 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

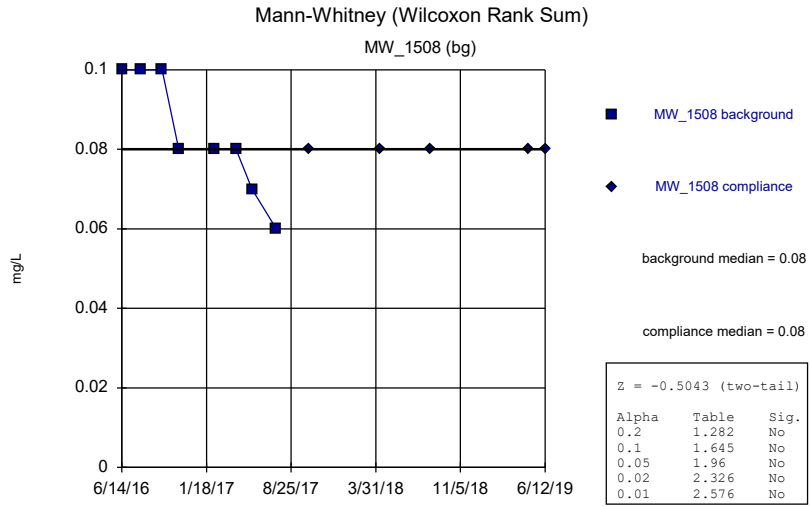
Hollow symbols indicate censored values.

Mann-Whitney (Wilcoxon Rank Sum)

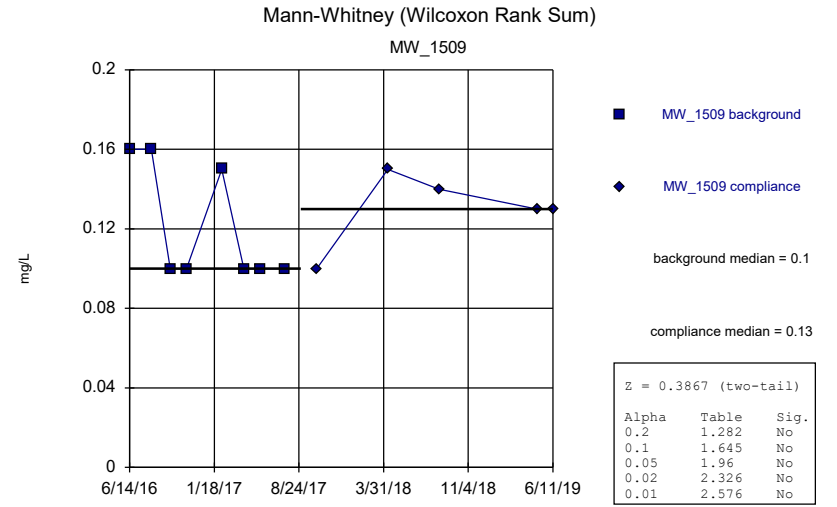
MW_1507



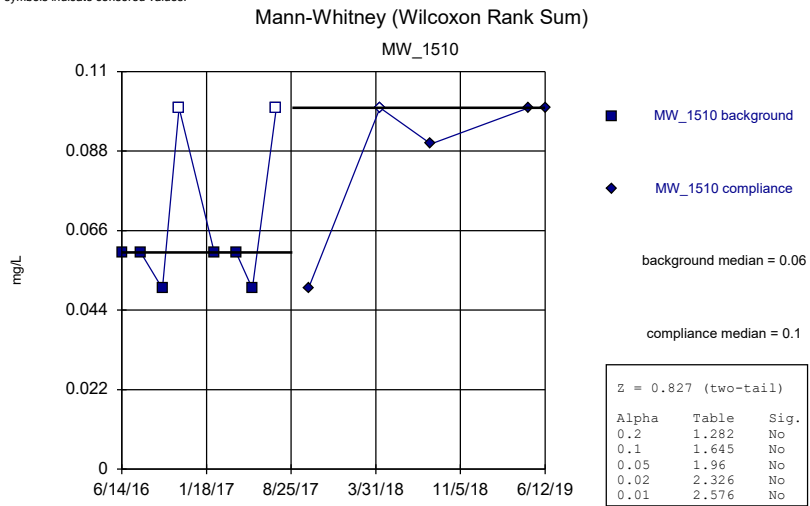
Constituent: Fluoride, total Analysis Run 12/27/2019 9:38 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP



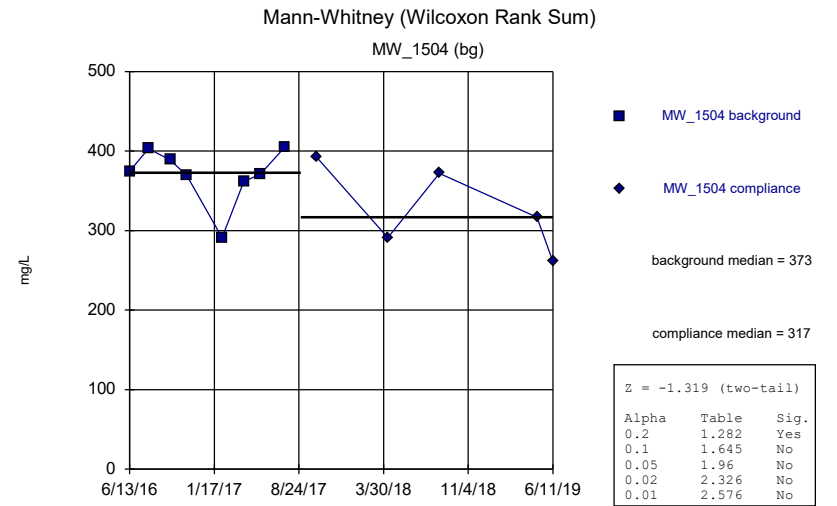
Constituent: Fluoride, total Analysis Run 12/27/2019 9:38 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Fluoride, total Analysis Run 12/27/2019 9:38 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP



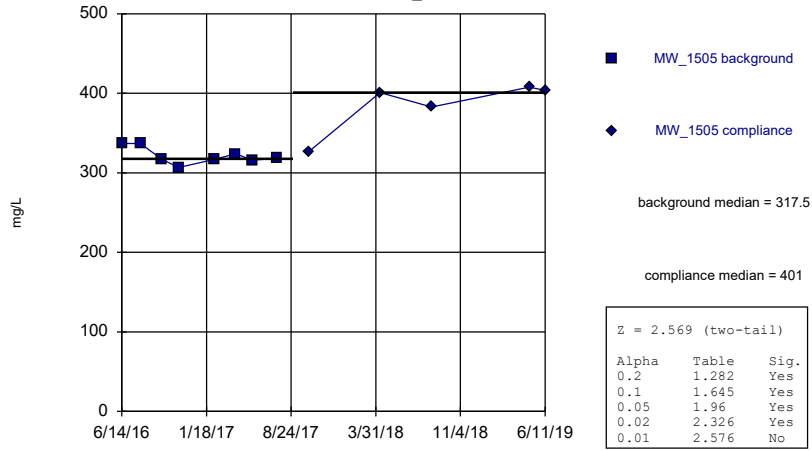
Constituent: Fluoride, total Analysis Run 12/27/2019 9:38 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Sulfate, total Analysis Run 12/27/2019 9:39 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Mann-Whitney (Wilcoxon Rank Sum)

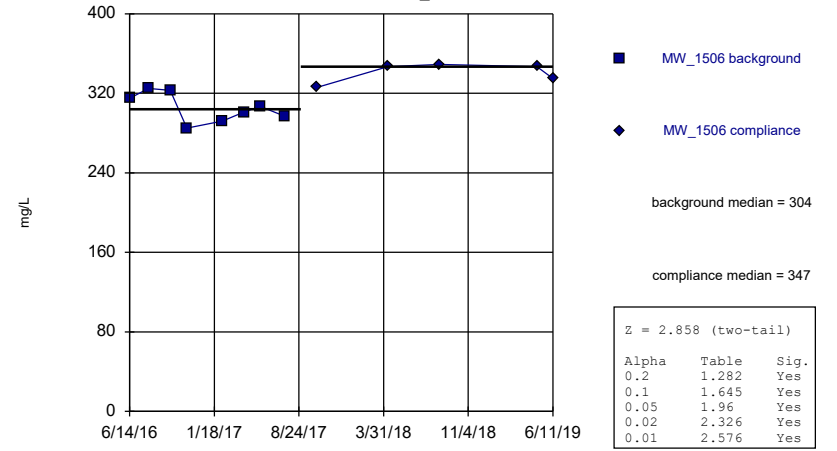
MW_1505



Constituent: Sulfate, total Analysis Run 12/27/2019 9:39 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Mann-Whitney (Wilcoxon Rank Sum)

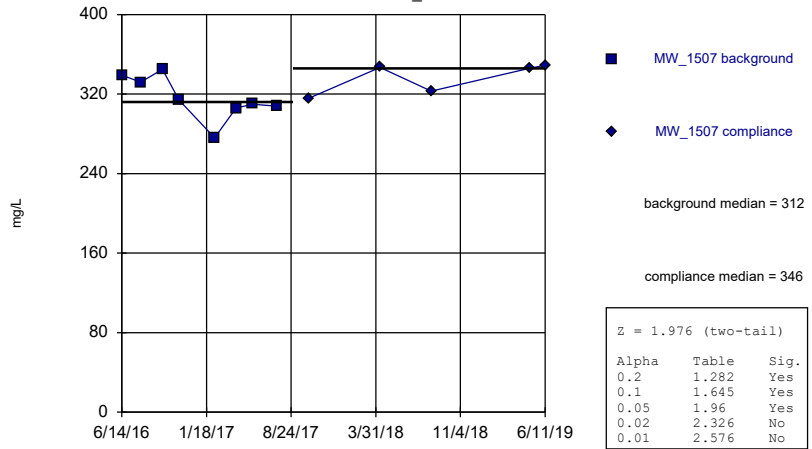
MW_1506



Constituent: Sulfate, total Analysis Run 12/27/2019 9:39 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Mann-Whitney (Wilcoxon Rank Sum)

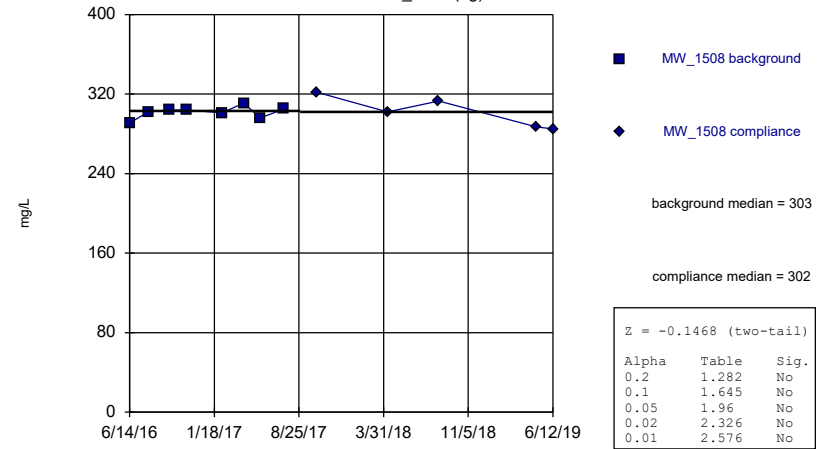
MW_1507



Constituent: Sulfate, total Analysis Run 12/27/2019 9:39 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

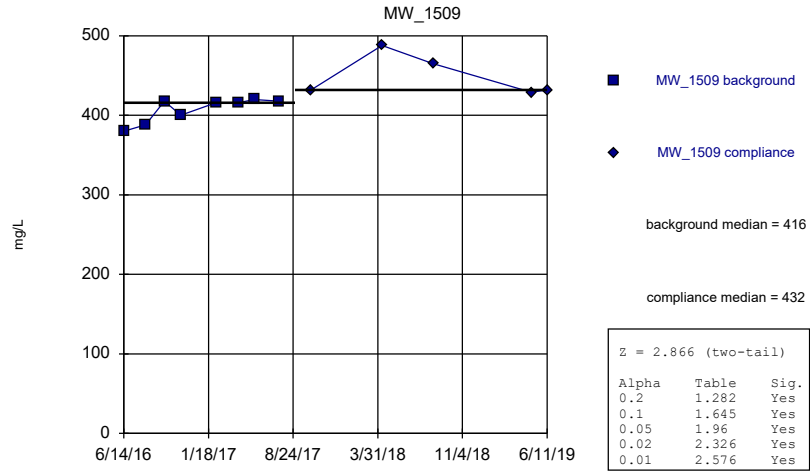
Mann-Whitney (Wilcoxon Rank Sum)

MW_1508 (bg)



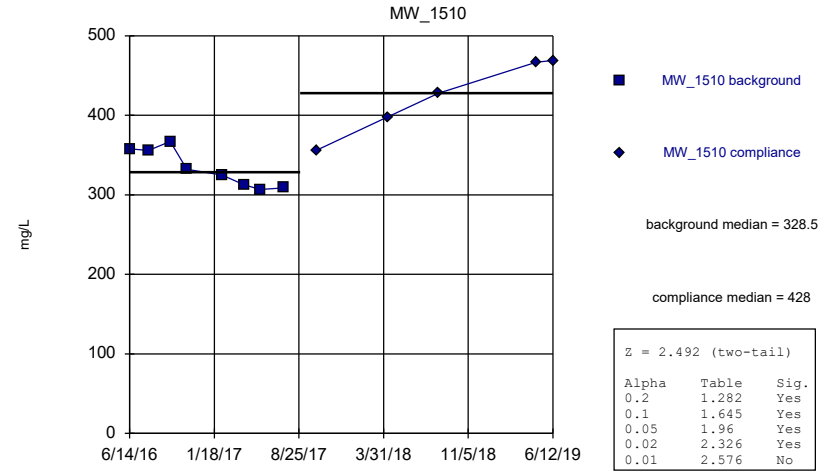
Constituent: Sulfate, total Analysis Run 12/27/2019 9:39 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Mann-Whitney (Wilcoxon Rank Sum)



Constituent: Sulfate, total Analysis Run 12/27/2019 9:39 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Mann-Whitney (Wilcoxon Rank Sum)



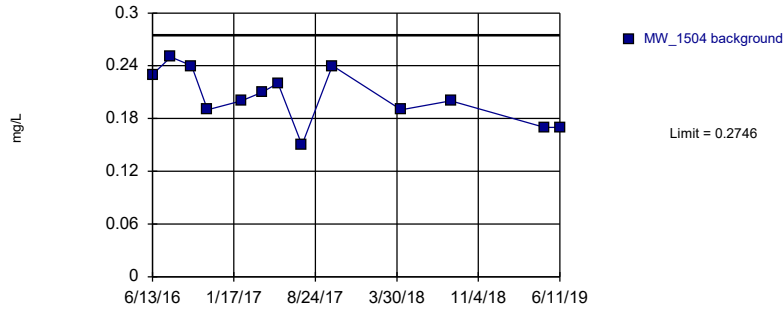
Constituent: Sulfate, total Analysis Run 12/27/2019 9:39 AM View: Intrawell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Intrawell Prediction Limit Summary

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/27/2019, 9:49 AM

| Constituent | Well | Upper Lim. | Lower Lim. | Date | Observ. | Bg N | %NDs | Transform | Alpha | Method |
|------------------------|---------|------------|------------|------|----------|------|-------|-----------|----------|--------------------------|
| Fluoride, total (mg/L) | MW_1504 | 0.2746 | n/a | n/a | 1 future | 13 | 0 | No | 0.001504 | Param Intra 1 of 2 |
| Fluoride, total (mg/L) | MW_1505 | 0.03 | n/a | n/a | 1 future | 13 | 84.62 | n/a | 0.009692 | NP Intra (NDs) 1 of 2 |
| Fluoride, total (mg/L) | MW_1506 | 0.1 | n/a | n/a | 1 future | 13 | 61.54 | n/a | 0.009692 | NP Intra (NDs) 1 of 2 |
| Fluoride, total (mg/L) | MW_1507 | 0.09448 | n/a | n/a | 1 future | 13 | 7.692 | x^(1/3) | 0.001504 | Param Intra 1 of 2 |
| Fluoride, total (mg/L) | MW_1508 | 0.1 | n/a | n/a | 1 future | 13 | 0 | n/a | 0.009692 | NP Intra (normality) ... |
| Fluoride, total (mg/L) | MW_1509 | 0.1712 | n/a | n/a | 1 future | 13 | 0 | x^3 | 0.001504 | Param Intra 1 of 2 |
| Fluoride, total (mg/L) | MW_1510 | 0.1 | n/a | n/a | 1 future | 13 | 23.08 | n/a | 0.009692 | NP Intra (normality) ... |
| Sulfate, total (mg/L) | MW_1504 | 461.7 | n/a | n/a | 1 future | 13 | 0 | No | 0.001504 | Param Intra 1 of 2 |
| Sulfate, total (mg/L) | MW_1505 | 408 | n/a | n/a | 1 future | 13 | 0 | n/a | 0.009692 | NP Intra (normality) ... |
| Sulfate, total (mg/L) | MW_1506 | 368.7 | n/a | n/a | 1 future | 13 | 0 | No | 0.001504 | Param Intra 1 of 2 |
| Sulfate, total (mg/L) | MW_1507 | 373.2 | n/a | n/a | 1 future | 13 | 0 | No | 0.001504 | Param Intra 1 of 2 |
| Sulfate, total (mg/L) | MW_1508 | 325.4 | n/a | n/a | 1 future | 13 | 0 | No | 0.001504 | Param Intra 1 of 2 |
| Sulfate, total (mg/L) | MW_1509 | 488.8 | n/a | n/a | 1 future | 13 | 0 | No | 0.001504 | Param Intra 1 of 2 |
| Sulfate, total (mg/L) | MW_1510 | 496.8 | n/a | n/a | 1 future | 13 | 0 | No | 0.001504 | Param Intra 1 of 2 |

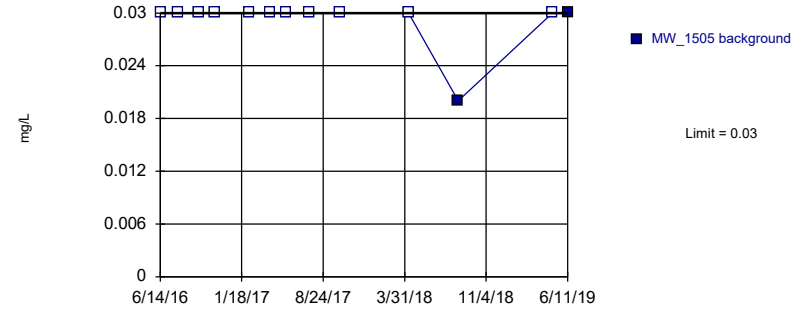
Prediction Limit
Intrawell Parametric, MW_1504 (bg)



Background Data Summary: Mean=0.2046, Std. Dev.=0.03072, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9628, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Fluoride, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

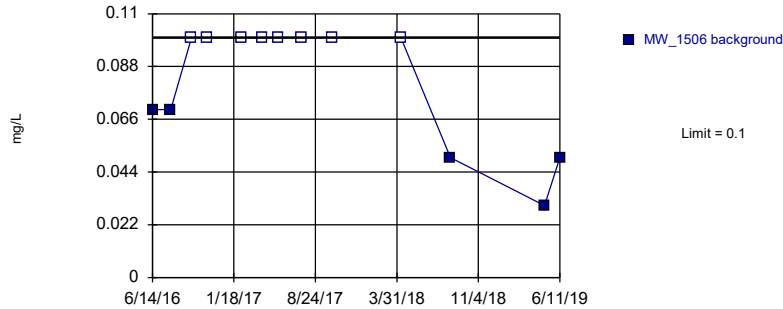
Prediction Limit
Intrawell Non-parametric, MW_1505



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 13 background values. 84.62% NDs. Well-constituent pair annual alpha = 0.01929. Individual comparison alpha = 0.009692 (1 of 2). Assumes 1 future value.

Constituent: Fluoride, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

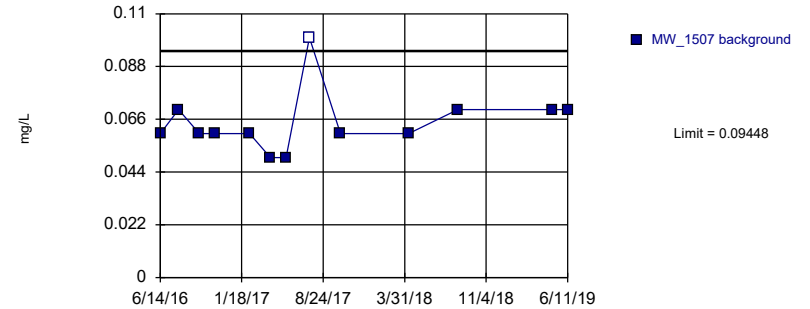
Prediction Limit
Intrawell Non-parametric, MW_1506



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 13 background values. 61.54% NDs. Well-constituent pair annual alpha = 0.01929. Individual comparison alpha = 0.009692 (1 of 2). Assumes 1 future value.

Constituent: Fluoride, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

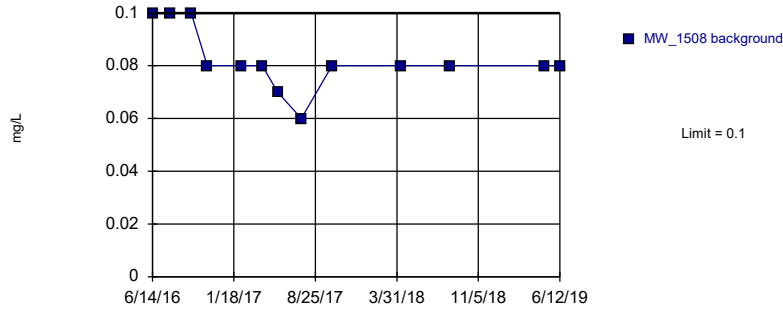
Prediction Limit
Intrawell Parametric, MW_1507



Background Data Summary (based on cube root transformation): Mean=0.3999, Std. Dev.=0.02439, n=13, 7.692% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8228, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Fluoride, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

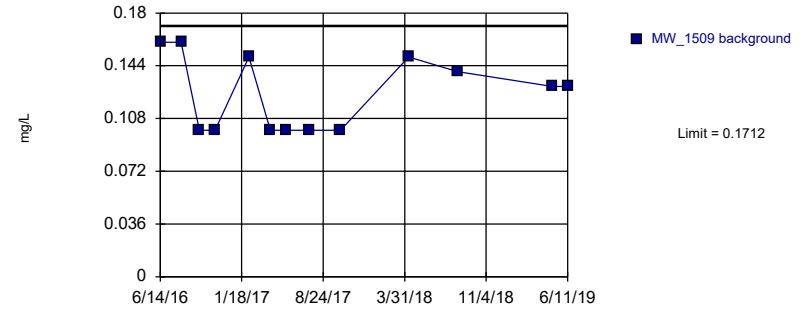
Prediction Limit
Intrawell Non-parametric, MW_1508 (bg)



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

Constituent: Fluoride, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

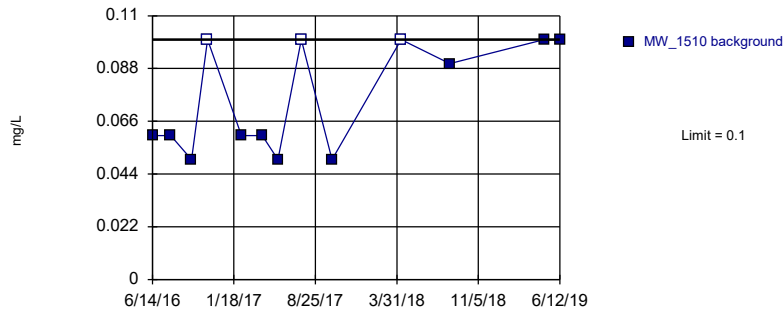
Prediction Limit
Intrawell Parametric, MW_1509



Background Data Summary (based on cube transformation): Mean=0.00216, Std. Dev.=0.001254, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8158, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Fluoride, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

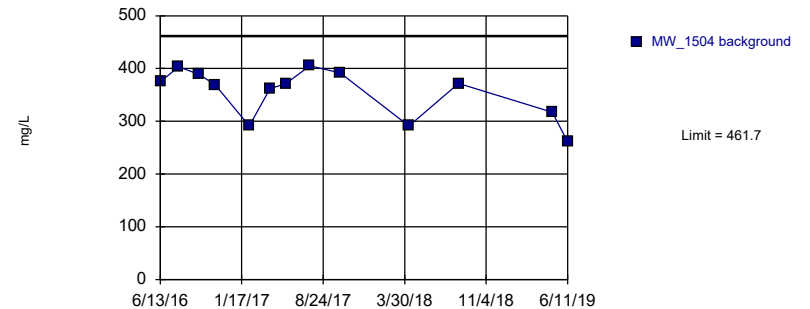
Prediction Limit
Intrawell Non-parametric, MW_1510



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 13 background values. 23.08% NDs. Well-constituent pair annual alpha = 0.01929. Individual comparison alpha = 0.009692 (1 of 2). Assumes 1 future value.

Constituent: Fluoride, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

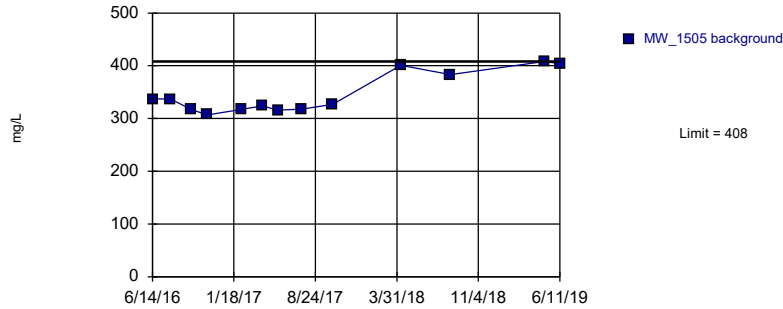
Prediction Limit
Intrawell Parametric, MW_1504 (bg)



Background Data Summary: Mean=353.7, Std. Dev.=47.41, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8641, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Sulfate, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

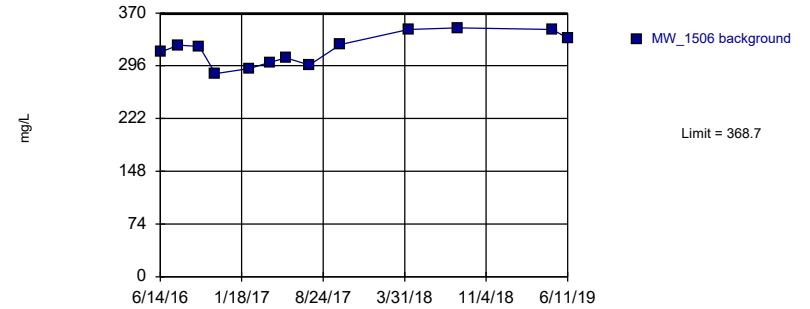
Prediction Limit
Intrawell Non-parametric, MW_1505



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

Constituent: Sulfate, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

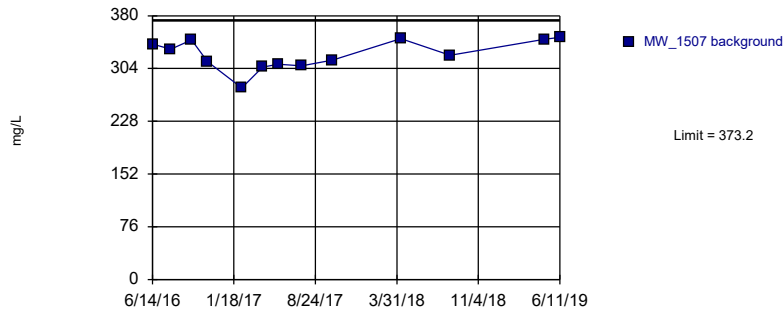
Prediction Limit
Intrawell Parametric, MW_1506



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

Constituent: Sulfate, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

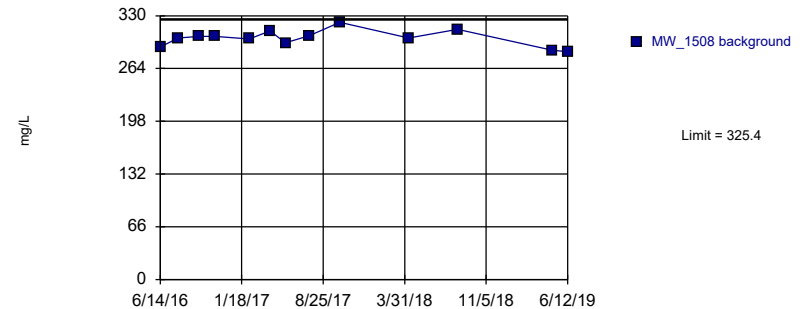
Prediction Limit
Intrawell Parametric, MW_1507



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

Constituent: Sulfate, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

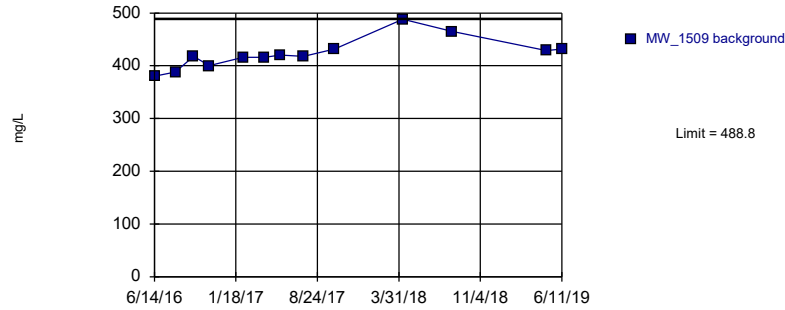
Prediction Limit
Intrawell Parametric, MW_1508 (bg)



Background Data Summary: Mean=301.8, Std. Dev.=10.37, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9642, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Sulfate, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

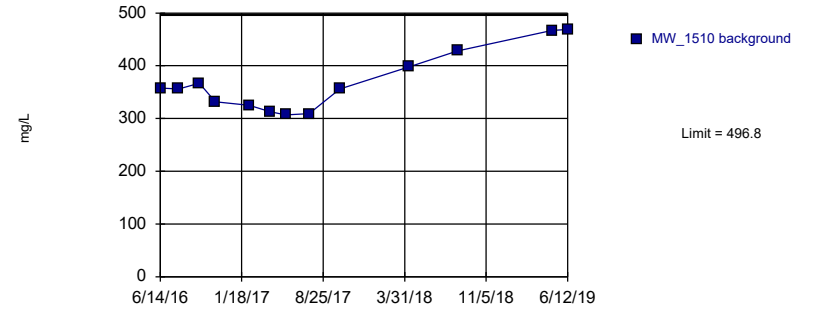
Prediction Limit
Intrawell Parametric, MW_1509



Background Data Summary: Mean=423.2, Std. Dev.=28.79, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9163, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Sulfate, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Prediction Limit
Intrawell Parametric, MW_1510



Background Data Summary: Mean=368.1, Std. Dev.=56.47, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8801, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Sulfate, total Analysis Run 12/27/2019 9:48 AM View: Intrawell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Interwell Appendix III Trend Test - Significant Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/23/2019, 1:51 PM

| <u>Constituent</u> | <u>Well</u> | <u>Slope</u> | <u>Calc.</u> | <u>Critical</u> | <u>Sig.</u> | <u>N</u> | <u>%NDs</u> | <u>Normality</u> | <u>Xform</u> | <u>Alpha</u> | <u>Method</u> |
|------------------------|--------------|--------------|--------------|-----------------|-------------|----------|-------------|------------------|--------------|--------------|---------------|
| Chloride, total (mg/L) | MW_1508 (bg) | -19.98 | -67 | -48 | Yes | 14 | 0 | n/a | n/a | 0.01 | NP |
| pH, field (SU) | MW_1504 (bg) | 0.1603 | 56 | 48 | Yes | 14 | 0 | n/a | n/a | 0.01 | NP |

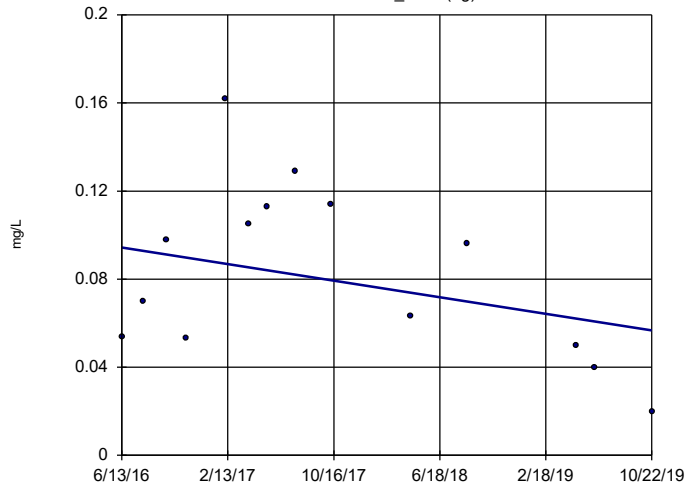
Interwell Appendix III Trend Test - All Results

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/23/2019, 1:51 PM

| <u>Constituent</u> | <u>Well</u> | <u>Slope</u> | <u>Calc.</u> | <u>Critical</u> | <u>Sig.</u> | <u>N</u> | <u>%NDs</u> | <u>Normality</u> | <u>Xform</u> | <u>Alpha</u> | <u>Method</u> |
|------------------------------------|---------------------|---------------|--------------|-----------------|-------------|-----------|-------------|------------------|--------------|--------------|---------------|
| Boron, total (mg/L) | MW_1504 (bg) | -0.01117 | -23 | -48 | No | 14 | 0 | n/a | n/a | 0.01 | NP |
| Boron, total (mg/L) | MW_1508 (bg) | -0.04102 | -9 | -48 | No | 14 | 0 | n/a | n/a | 0.01 | NP |
| Calcium, total (mg/L) | MW_1504 (bg) | -6.046 | -26 | -48 | No | 14 | 0 | n/a | n/a | 0.01 | NP |
| Calcium, total (mg/L) | MW_1508 (bg) | -1.861 | -6 | -48 | No | 14 | 0 | n/a | n/a | 0.01 | NP |
| Chloride, total (mg/L) | MW_1504 (bg) | -5.395 | -46 | -48 | No | 14 | 0 | n/a | n/a | 0.01 | NP |
| Chloride, total (mg/L) | MW_1508 (bg) | -19.98 | -67 | -48 | Yes | 14 | 0 | n/a | n/a | 0.01 | NP |
| pH, field (SU) | MW_1504 (bg) | 0.1603 | 56 | 48 | Yes | 14 | 0 | n/a | n/a | 0.01 | NP |
| pH, field (SU) | MW_1508 (bg) | 0.08144 | 37 | 48 | No | 14 | 0 | n/a | n/a | 0.01 | NP |
| Total Dissolved Solids [TDS] (m... | MW_1504 (bg) | -42.26 | -39 | -48 | No | 14 | 0 | n/a | n/a | 0.01 | NP |
| Total Dissolved Solids [TDS] (m... | MW_1508 (bg) | -29.53 | -25 | -48 | No | 14 | 0 | n/a | n/a | 0.01 | NP |

Sen's Slope Estimator

MW_1504 (bg)

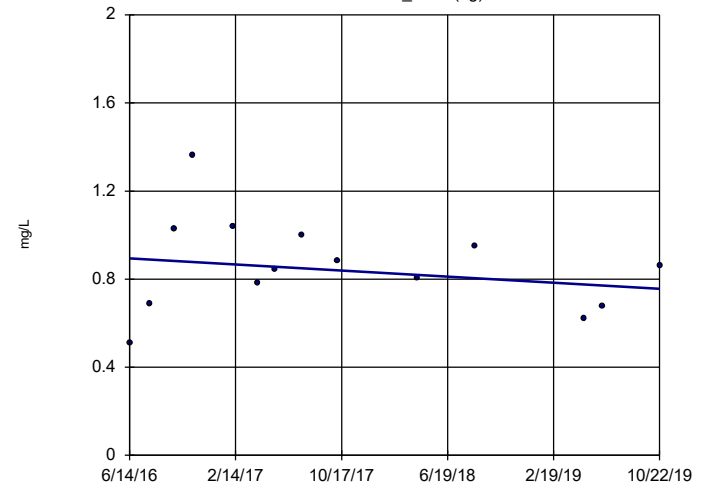


n = 14
 Slope = -0.01117
 units per year.
 Mann-Kendall
 statistic = -23
 critical = -48
 Trend not sig-
 nificant at 99%
 confidence level
 (alpha = 0.005 per
 tail).

Constituent: Boron, total Analysis Run 12/23/2019 1:49 PM View: Interwell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sen's Slope Estimator

MW_1508 (bg)

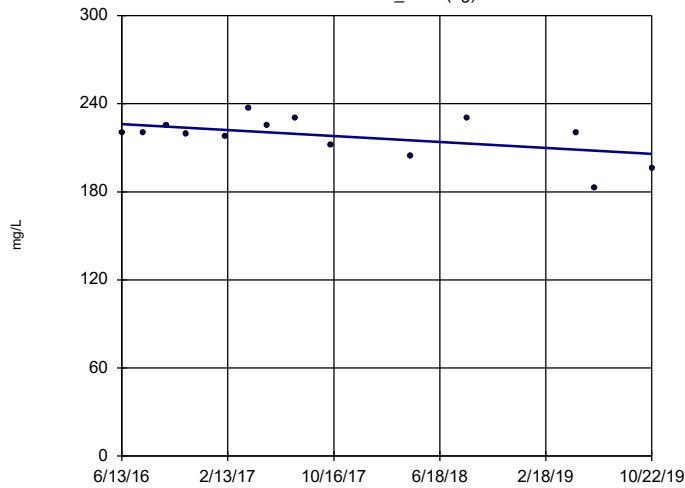


n = 14
 Slope = -0.04102
 units per year.
 Mann-Kendall
 statistic = -9
 critical = -48
 Trend not sig-
 nificant at 99%
 confidence level
 (alpha = 0.005 per
 tail).

Constituent: Boron, total Analysis Run 12/23/2019 1:49 PM View: Interwell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sen's Slope Estimator

MW_1504 (bg)

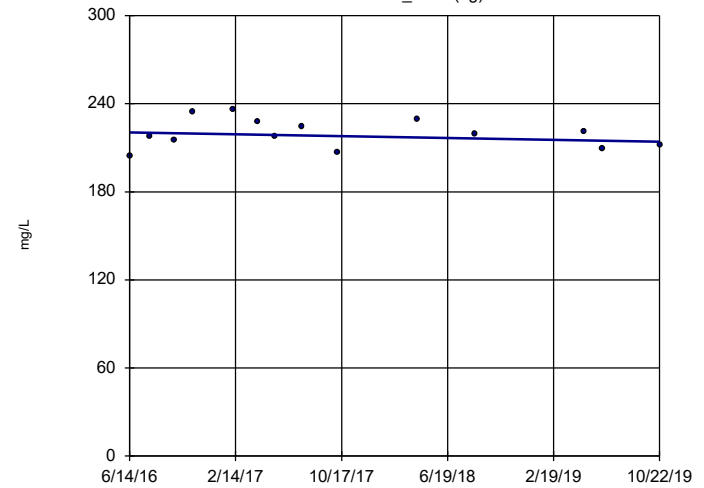


n = 14
 Slope = -6.046
 units per year.
 Mann-Kendall
 statistic = -26
 critical = -48
 Trend not sig-
 nificant at 99%
 confidence level
 (alpha = 0.005 per
 tail).

Constituent: Calcium, total Analysis Run 12/23/2019 1:50 PM View: Interwell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sen's Slope Estimator

MW_1508 (bg)

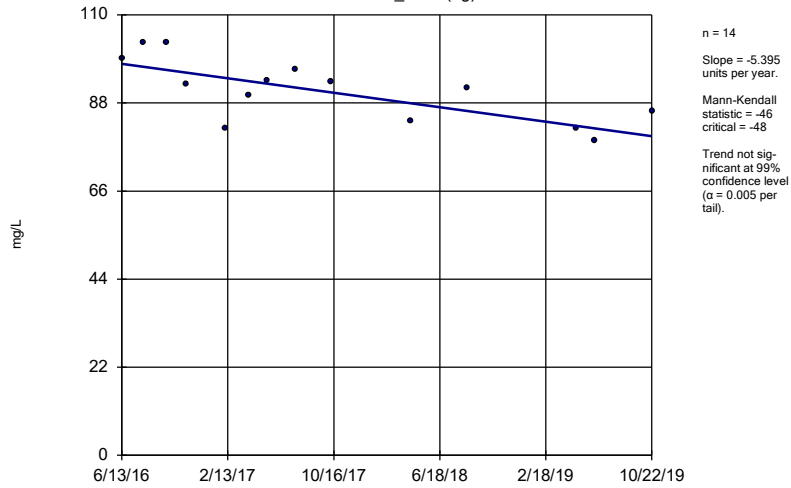


n = 14
 Slope = -1.861
 units per year.
 Mann-Kendall
 statistic = -6
 critical = -48
 Trend not sig-
 nificant at 99%
 confidence level
 (alpha = 0.005 per
 tail).

Constituent: Calcium, total Analysis Run 12/23/2019 1:50 PM View: Interwell All
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sen's Slope Estimator

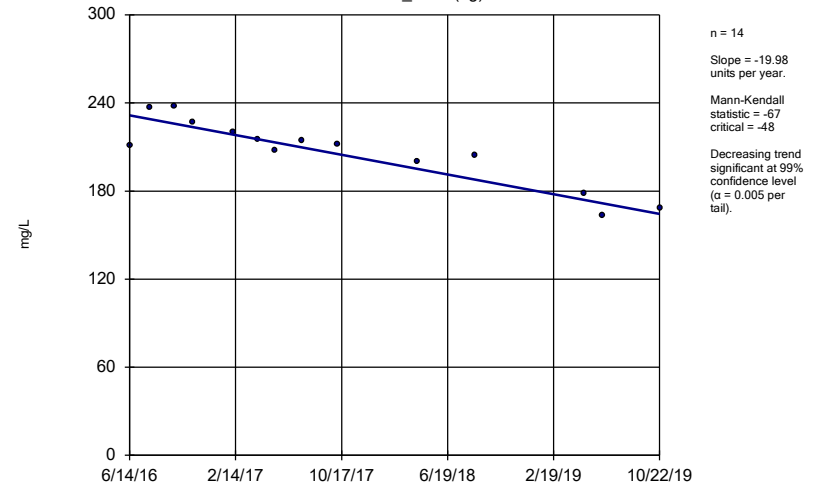
MW_1504 (bg)



Constituent: Chloride, total Analysis Run 12/23/2019 1:50 PM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sen's Slope Estimator

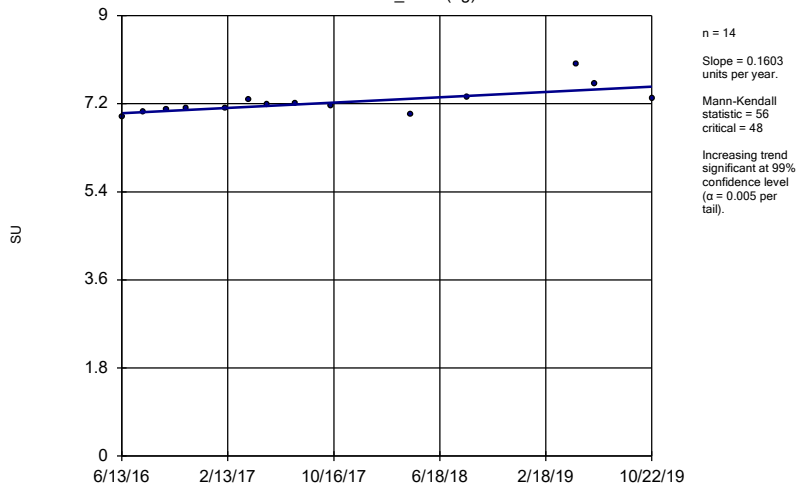
MW_1508 (bg)



Constituent: Chloride, total Analysis Run 12/23/2019 1:50 PM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sen's Slope Estimator

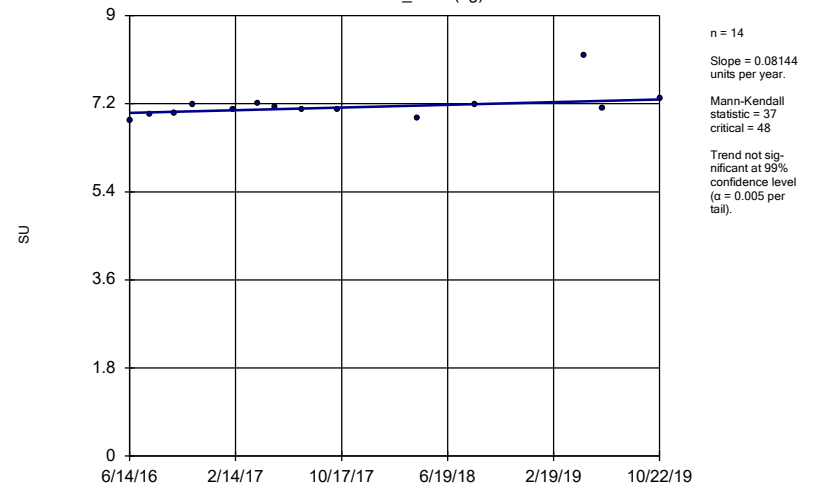
MW_1504 (bg)



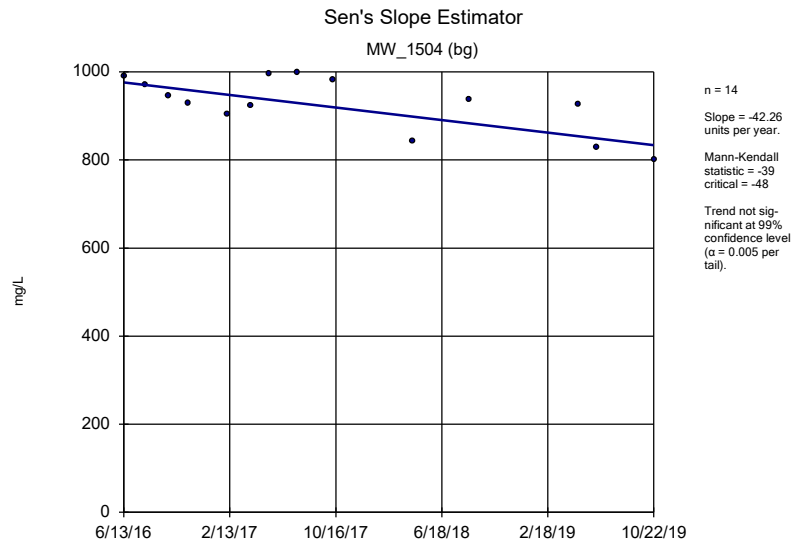
Constituent: pH, field Analysis Run 12/23/2019 1:50 PM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Sen's Slope Estimator

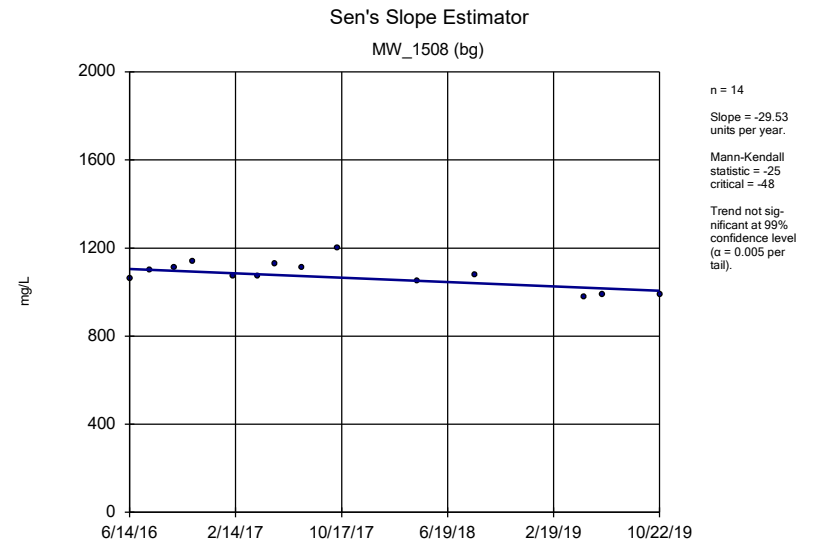
MW_1508 (bg)



Constituent: pH, field Analysis Run 12/23/2019 1:50 PM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP



Constituent: Total Dissolved Solids [TDS] Analysis Run 12/23/2019 1:50 PM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP



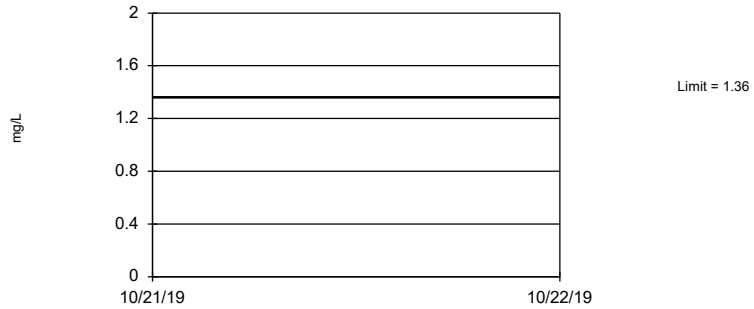
Constituent: Total Dissolved Solids [TDS] Analysis Run 12/23/2019 1:50 PM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Interwell Prediction Limit Summary

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 1/10/2020, 11:05 AM

| Constituent | Well | Upper Lim. | Lower Lim. | Bg N | Bg Mean | Std. Dev. | %NDs | ND Adj. | Transform | Alpha | Method |
|------------------------------------|------|------------|------------|------|---------|-----------|------|---------|-----------|----------|--------------------------|
| Boron, total (mg/L) | n/a | 1.36 | n/a | 28 | n/a | n/a | 0 | n/a | n/a | 0.002247 | NP Inter (normality) ... |
| Calcium, total (mg/L) | n/a | 242.1 | n/a | 28 | 218.3 | 12.15 | 0 | None | No | 0.001504 | Param Inter 1 of 2 |
| Chloride, total (mg/L) | n/a | 238 | n/a | 28 | n/a | n/a | 0 | n/a | n/a | 0.002247 | NP Inter (normality) ... |
| pH, field (SU) | n/a | 8.18 | 6.86 | 28 | n/a | n/a | 0 | n/a | n/a | 0.004494 | NP Inter (normality) ... |
| Total Dissolved Solids [TDS] (m... | n/a | 1194 | n/a | 28 | 1002 | 98.35 | 0 | None | No | 0.001504 | Param Inter 1 of 2 |

Prediction Limit
Interwell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 28 background values. Annual per-constituent alpha = 0.02225. Individual comparison alpha = 0.002247 (1 of 2). Assumes 5 future values.

Constituent: Boron, total Analysis Run 1/10/2020 11:04 AM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

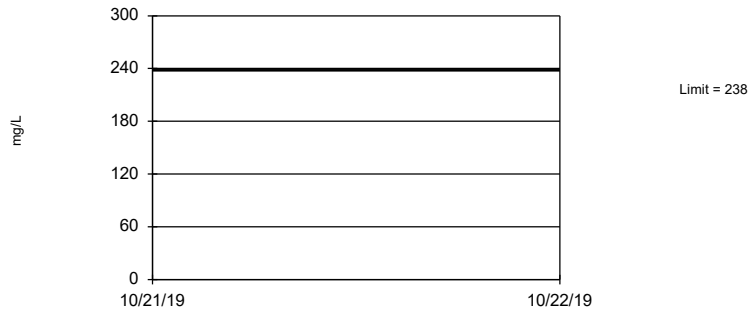
Prediction Limit
Interwell Parametric



Background Data Summary: Mean=218.3, Std. Dev.=12.15, n=28. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9444, critical = 0.896. Kappa = 1.958 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.007498. Individual comparison alpha = 0.001504. Assumes 5 future values.

Constituent: Calcium, total Analysis Run 1/10/2020 11:04 AM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

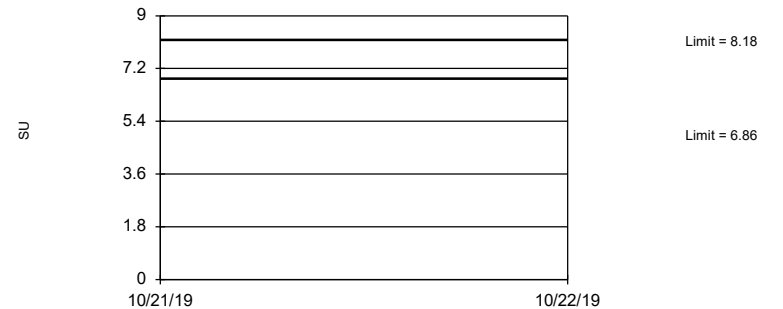
Prediction Limit
Interwell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 28 background values. Annual per-constituent alpha = 0.02225. Individual comparison alpha = 0.002247 (1 of 2). Assumes 5 future values.

Constituent: Chloride, total Analysis Run 1/10/2020 11:04 AM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Prediction Limit
Interwell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limits are highest and lowest of 28 background values. Annual per-constituent alpha = 0.04449. Individual comparison alpha = 0.004494 (1 of 2). Assumes 5 future values.

Constituent: pH, field Analysis Run 1/10/2020 11:04 AM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Prediction Limit
Interwell Parametric



Background Data Summary: Mean=1002, Std. Dev.=98.35, n=28. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9768, critical = 0.896. Kappa = 1.958 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.007498. Individual comparison alpha = 0.001504. Assumes 5 future values.

Constituent: Total Dissolved Solids [TDS] Analysis Run 1/10/2020 11:04 AM View: Interwell All
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Upper Tolerance Limits

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/23/2019, 1:56 PM

| Constituent | Well | Upper Lim. | Date | Observ. | Sig. | Bg N | %NDs | Transform | Alpha | Method |
|-----------------------------------|------|------------|------|---------|------|------|-------|-----------|--------|--------------------|
| Antimony, total (mg/L) | n/a | 0.00005034 | n/a | n/a | n/a | 26 | 15.38 | sqrt(x) | 0.05 | Inter |
| Arsenic, total (mg/L) | n/a | 0.001851 | n/a | n/a | n/a | 26 | 0 | x^(1/3) | 0.05 | Inter |
| Barium, total (mg/L) | n/a | 0.05567 | n/a | n/a | n/a | 26 | 0 | No | 0.05 | Inter |
| Beryllium, total (mg/L) | n/a | 0.00006 | n/a | n/a | n/a | 26 | 46.15 | n/a | 0.2635 | NP Inter(normal... |
| Cadmium, total (mg/L) | n/a | 0.00009 | n/a | n/a | n/a | 26 | 3.846 | n/a | 0.2635 | NP Inter(normal... |
| Chromium, total (mg/L) | n/a | 0.002125 | n/a | n/a | n/a | 26 | 0 | No | 0.05 | Inter |
| Cobalt, total (mg/L) | n/a | 0.003246 | n/a | n/a | n/a | 26 | 0 | sqrt(x) | 0.05 | Inter |
| Combined Radium 226 + 228 (pCi/L) | n/a | 2.155 | n/a | n/a | n/a | 25 | 0 | sqrt(x) | 0.05 | Inter |
| Fluoride, total (mg/L) | n/a | 0.25 | n/a | n/a | n/a | 28 | 0 | n/a | 0.2378 | NP Inter(normal... |
| Lead, total (mg/L) | n/a | 0.003449 | n/a | n/a | n/a | 26 | 7.692 | x^(1/3) | 0.05 | Inter |
| Lithium, total (mg/L) | n/a | 0.0136 | n/a | n/a | n/a | 26 | 23.08 | No | 0.05 | Inter |
| Mercury, total (mg/L) | n/a | 0.000008 | n/a | n/a | n/a | 26 | 73.08 | n/a | 0.2635 | NP Inter(normal... |
| Molybdenum, total (mg/L) | n/a | 0.001678 | n/a | n/a | n/a | 26 | 19.23 | sqrt(x) | 0.05 | Inter |
| Selenium, total (mg/L) | n/a | 0.0009 | n/a | n/a | n/a | 26 | 15.38 | n/a | 0.2635 | NP Inter(normal... |
| Thallium, total (mg/L) | n/a | 0.00025 | n/a | n/a | n/a | 26 | 26.92 | n/a | 0.2635 | NP Inter(normal... |

| MITCHELL BAP GWPS | | | | |
|--------------------------------|------------|---------------------------|-------------------------|-------------|
| Constituent Name | MCL | CCR-Rule Specified | Background Limit | GWPS |
| Antimony, Total (mg/L) | 0.006 | | 0.00005 | 0.006 |
| Arsenic, Total (mg/L) | 0.01 | | 0.0019 | 0.01 |
| Barium, Total (mg/L) | 2 | | 0.056 | 2 |
| Beryllium, Total (mg/L) | 0.004 | | 0.00006 | 0.004 |
| Cadmium, Total (mg/L) | 0.005 | | 0.00009 | 0.005 |
| Chromium, Total (mg/L) | 0.1 | | 0.0021 | 0.1 |
| Cobalt, Total (mg/L) | n/a | 0.006 | 0.0032 | 0.006 |
| Combined Radium, Total (pCi/L) | 5 | | 2.16 | 5 |
| Fluoride, Total (mg/L) | 4 | | 0.25 | 4 |
| Lead, Total (mg/L) | 0.015 | | 0.0034 | 0.015 |
| Lithium, Total (mg/L) | n/a | 0.04 | 0.014 | 0.04 |
| Mercury, Total (mg/L) | 0.002 | | 0.000008 | 0.002 |
| Molybdenum, Total (mg/L) | n/a | 0.1 | 0.0017 | 0.1 |
| Selenium, Total (mg/L) | 0.05 | | 0.0009 | 0.05 |
| Thallium, Total (mg/L) | 0.002 | | 0.00025 | 0.002 |

**MCL = Maximum Contaminant Level*

**GWPS = Groundwater Protection Standard*

Confidence Interval Summary Table - All Results (No Significant)

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/23/2019, 1:59 PM

| Constituent | Well | Upper Lim. | Lower Lim. | Compliance | Sig. | N | %NDs | Transform | Alpha | Method |
|-----------------------------------|---------|------------|-------------|------------|------|----|-------|-----------|-------|------------------|
| Antimony, total (mg/L) | MW_1505 | 0.0001 | 0.00003 | 0.006 | No | 13 | 7.692 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW_1506 | 0.00007 | 0.00003 | 0.006 | No | 13 | 0 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW_1507 | 0.00009522 | 0.00004786 | 0.006 | No | 13 | 0 | No | 0.01 | Param. |
| Antimony, total (mg/L) | MW_1509 | 0.00009 | 0.00002 | 0.006 | No | 13 | 0 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW_1510 | 0.00003 | 0.00002 | 0.006 | No | 13 | 0 | No | 0.01 | NP (normality) |
| Arsenic, total (mg/L) | MW_1505 | 0.001417 | 0.0003768 | 0.01 | No | 13 | 0 | x^(1/3) | 0.01 | Param. |
| Arsenic, total (mg/L) | MW_1506 | 0.001077 | 0.0004996 | 0.01 | No | 13 | 0 | No | 0.01 | Param. |
| Arsenic, total (mg/L) | MW_1507 | 0.002917 | 0.0007721 | 0.01 | No | 13 | 0 | No | 0.01 | Param. |
| Arsenic, total (mg/L) | MW_1509 | 0.0005313 | 0.0003502 | 0.01 | No | 13 | 0 | No | 0.01 | Param. |
| Arsenic, total (mg/L) | MW_1510 | 0.0005865 | 0.0003628 | 0.01 | No | 13 | 0 | No | 0.01 | Param. |
| Barium, total (mg/L) | MW_1505 | 0.0633 | 0.0459 | 2 | No | 13 | 0 | No | 0.01 | NP (normality) |
| Barium, total (mg/L) | MW_1506 | 0.06343 | 0.05312 | 2 | No | 13 | 0 | No | 0.01 | Param. |
| Barium, total (mg/L) | MW_1507 | 0.08602 | 0.0597 | 2 | No | 13 | 0 | No | 0.01 | Param. |
| Barium, total (mg/L) | MW_1509 | 0.06187 | 0.05222 | 2 | No | 13 | 0 | No | 0.01 | Param. |
| Barium, total (mg/L) | MW_1510 | 0.04618 | 0.04041 | 2 | No | 13 | 0 | No | 0.01 | Param. |
| Beryllium, total (mg/L) | MW_1505 | 0.000091 | 0.000007 | 0.004 | No | 13 | 38.46 | No | 0.01 | NP (Cohens/xfrm) |
| Beryllium, total (mg/L) | MW_1506 | 0.0000782 | 0.0001269 | 0.004 | No | 13 | 23.08 | No | 0.01 | Param. |
| Beryllium, total (mg/L) | MW_1507 | 0.0001273 | 0.00003965 | 0.004 | No | 13 | 23.08 | No | 0.01 | Param. |
| Beryllium, total (mg/L) | MW_1509 | 0.00005 | 0.000008 | 0.004 | No | 13 | 69.23 | No | 0.01 | NP (normality) |
| Beryllium, total (mg/L) | MW_1510 | 0.00005 | 0.000008 | 0.004 | No | 13 | 46.15 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW_1505 | 0.00005 | 0.00002 | 0.005 | No | 13 | 0 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW_1506 | 0.00004 | 0.00001 | 0.005 | No | 13 | 0 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW_1507 | 0.00007 | 0.00003 | 0.005 | No | 13 | 0 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW_1509 | 0.00003 | 0.000008 | 0.005 | No | 13 | 0 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW_1510 | 0.000025 | 0.000005 | 0.005 | No | 13 | 23.08 | No | 0.01 | NP (normality) |
| Chromium, total (mg/L) | MW_1505 | 0.0065 | 0.0009857 | 0.1 | No | 12 | 0 | x^(1/3) | 0.01 | Param. |
| Chromium, total (mg/L) | MW_1506 | 0.002726 | 0.0009805 | 0.1 | No | 13 | 0 | sqrt(x) | 0.01 | Param. |
| Chromium, total (mg/L) | MW_1507 | 0.01429 | 0.003916 | 0.1 | No | 13 | 0 | No | 0.01 | Param. |
| Chromium, total (mg/L) | MW_1509 | 0.001959 | 0.000684 | 0.1 | No | 13 | 0 | x^(1/3) | 0.01 | Param. |
| Chromium, total (mg/L) | MW_1510 | 0.002498 | 0.0006514 | 0.1 | No | 12 | 0 | ln(x) | 0.01 | Param. |
| Cobalt, total (mg/L) | MW_1505 | 0.001088 | 0.000224 | 0.006 | No | 13 | 0 | sqrt(x) | 0.01 | Param. |
| Cobalt, total (mg/L) | MW_1506 | 0.0008524 | 0.0003422 | 0.006 | No | 13 | 0 | No | 0.01 | Param. |
| Cobalt, total (mg/L) | MW_1507 | 0.002942 | 0.0007406 | 0.006 | No | 13 | 0 | No | 0.01 | Param. |
| Cobalt, total (mg/L) | MW_1509 | 0.0003735 | 0.0001688 | 0.006 | No | 13 | 0 | No | 0.01 | Param. |
| Cobalt, total (mg/L) | MW_1510 | 0.0002739 | 0.000145 | 0.006 | No | 13 | 0 | No | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW_1505 | 1.04 | 0.5131 | 5 | No | 13 | 0 | No | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW_1506 | 1.293 | 0.4113 | 5 | No | 13 | 0 | No | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW_1507 | 1.626 | 0.7118 | 5 | No | 12 | 0 | No | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW_1509 | 1.391 | 0.5042 | 5 | No | 13 | 0 | sqrt(x) | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW_1510 | 1.04 | 0.3568 | 5 | No | 12 | 0 | No | 0.01 | Param. |
| Fluoride, total (mg/L) | MW_1505 | 0.1 | 0.03 | 4 | No | 14 | 78.57 | No | 0.01 | NP (NDs) |
| Fluoride, total (mg/L) | MW_1506 | 0.1 | 0.04 | 4 | No | 14 | 57.14 | No | 0.01 | NP (normality) |
| Fluoride, total (mg/L) | MW_1507 | 0.07393 | 0.05684 | 4 | No | 14 | 7.143 | x^(1/3) | 0.01 | Param. |
| Fluoride, total (mg/L) | MW_1509 | 0.16 | 0.1 | 4 | No | 14 | 0 | No | 0.01 | NP (normality) |
| Fluoride, total (mg/L) | MW_1510 | 0.1 | 0.05 | 4 | No | 14 | 21.43 | No | 0.01 | NP (normality) |
| Lead, total (mg/L) | MW_1505 | 0.001021 | 0.0001018 | 0.015 | No | 13 | 7.692 | x^(1/3) | 0.01 | Param. |
| Lead, total (mg/L) | MW_1506 | 0.0007056 | 0.0002338 | 0.015 | No | 13 | 0 | No | 0.01 | Param. |
| Lead, total (mg/L) | MW_1507 | 0.00271 | 0.0004773 | 0.015 | No | 13 | 7.692 | sqrt(x) | 0.01 | Param. |
| Lead, total (mg/L) | MW_1509 | 0.0001217 | 0.00002425 | 0.015 | No | 13 | 0 | sqrt(x) | 0.01 | Param. |
| Lead, total (mg/L) | MW_1510 | 0.0002134 | 0.00007979 | 0.015 | No | 13 | 0 | sqrt(x) | 0.01 | Param. |
| Lithium, total (mg/L) | MW_1505 | 0.01207 | 0.006602 | 0.04 | No | 13 | 7.692 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW_1506 | 0.01553 | 0.009503 | 0.04 | No | 13 | 7.692 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW_1507 | 0.01792 | 0.01087 | 0.04 | No | 13 | 7.692 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW_1509 | 0.01739 | 0.009223 | 0.04 | No | 13 | 7.692 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW_1510 | 0.01491 | 0.008266 | 0.04 | No | 13 | 0 | No | 0.01 | Param. |
| Mercury, total (mg/L) | MW_1505 | 0.000006 | 0.000002 | 0.002 | No | 13 | 69.23 | No | 0.01 | NP (normality) |
| Mercury, total (mg/L) | MW_1506 | 0.000003 | 0.000002 | 0.002 | No | 13 | 53.85 | No | 0.01 | NP (normality) |
| Mercury, total (mg/L) | MW_1507 | 0.00001109 | 0.000003086 | 0.002 | No | 13 | 7.692 | sqrt(x) | 0.01 | Param. |
| Mercury, total (mg/L) | MW_1509 | 0.0000025 | 0.000002 | 0.002 | No | 13 | 84.62 | No | 0.01 | NP (NDs) |
| Mercury, total (mg/L) | MW_1510 | 0.0000025 | 0.000002 | 0.002 | No | 13 | 92.31 | No | 0.01 | NP (NDs) |
| Molybdenum, total (mg/L) | MW_1505 | 0.00162 | 0.0007387 | 0.1 | No | 12 | 8.333 | sqrt(x) | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW_1506 | 0.00131 | 0.0005545 | 0.1 | No | 13 | 0 | sqrt(x) | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW_1507 | 0.004698 | 0.0008668 | 0.1 | No | 13 | 7.692 | sqrt(x) | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW_1509 | 0.001694 | 0.000527 | 0.1 | No | 13 | 23.08 | No | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW_1510 | 0.001 | 0.00028 | 0.1 | No | 12 | 25 | No | 0.01 | NP (Cohens/xfrm) |
| Selenium, total (mg/L) | MW_1505 | 0.0007055 | 0.0003099 | 0.05 | No | 13 | 0 | No | 0.01 | Param. |
| Selenium, total (mg/L) | MW_1506 | 0.0002 | 0.00005 | 0.05 | No | 13 | 15.38 | No | 0.01 | NP (Cohens/xfrm) |
| Selenium, total (mg/L) | MW_1507 | 0.0004336 | 0.0001156 | 0.05 | No | 13 | 0 | No | 0.01 | Param. |

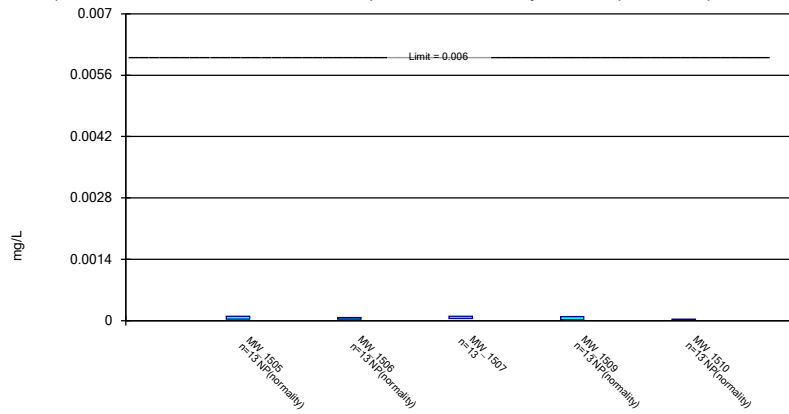
Confidence Interval Summary Table - All Results (No Significant) ^{Page 2}

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 12/23/2019, 1:59 PM

| Constituent | Well | Upper Lim. | Lower Lim. | Compliance | Sig. | N | %NDs | Transform | Alpha | Method |
|------------------------|---------|------------|------------|------------|------|----|-------|-----------|-------|----------------|
| Selenium, total (mg/L) | MW_1509 | 0.0003 | 0.0001 | 0.05 | No | 13 | 0 | No | 0.01 | NP (normality) |
| Selenium, total (mg/L) | MW_1510 | 0.0002 | 0.00008 | 0.05 | No | 13 | 0 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW_1505 | 0.00025 | 0.000065 | 0.002 | No | 12 | 25 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW_1506 | 0.00025 | 0.00005 | 0.002 | No | 13 | 23.08 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW_1507 | 0.00025 | 0.00005 | 0.002 | No | 13 | 23.08 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW_1509 | 0.00025 | 0.00003 | 0.002 | No | 13 | 23.08 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW_1510 | 0.00025 | 0.00001 | 0.002 | No | 13 | 30.77 | No | 0.01 | NP (normality) |

Parametric and Non-Parametric (NP) Confidence Interval

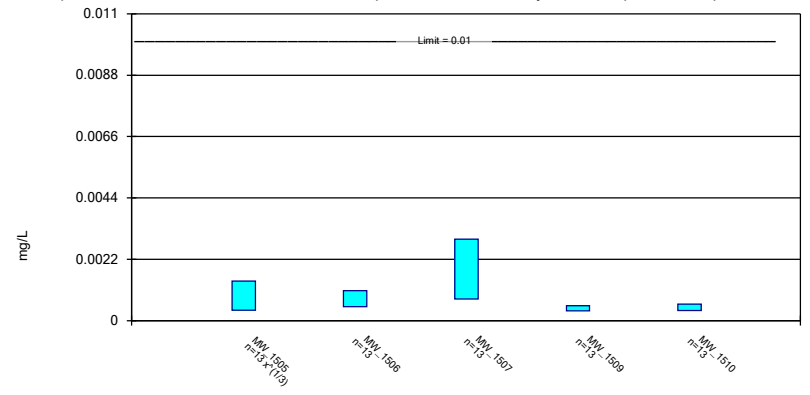
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Antimony, total Analysis Run 12/23/2019 1:57 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval

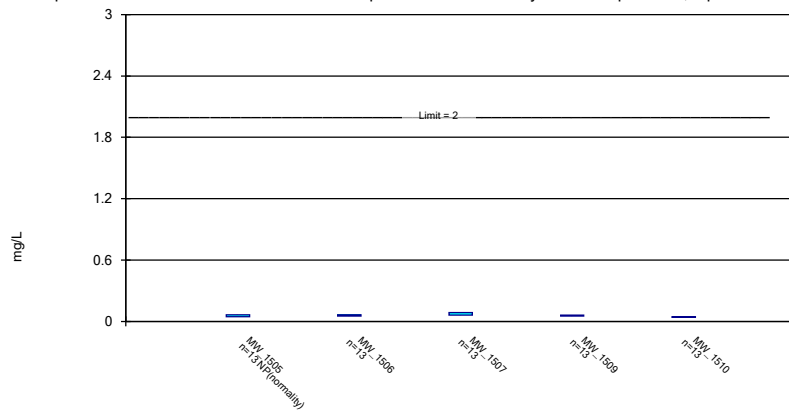
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Arsenic, total Analysis Run 12/23/2019 1:58 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval

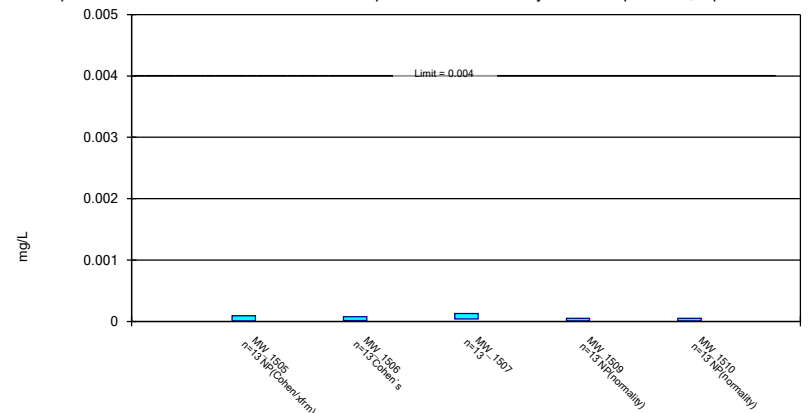
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Barium, total Analysis Run 12/23/2019 1:58 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval

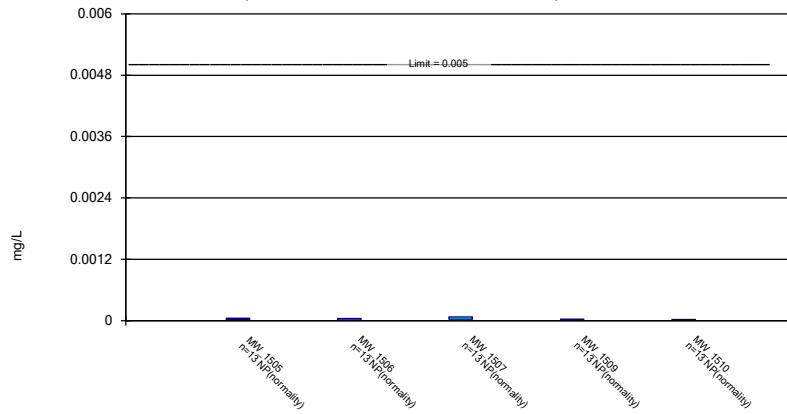
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Beryllium, total Analysis Run 12/23/2019 1:58 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Non-Parametric Confidence Interval

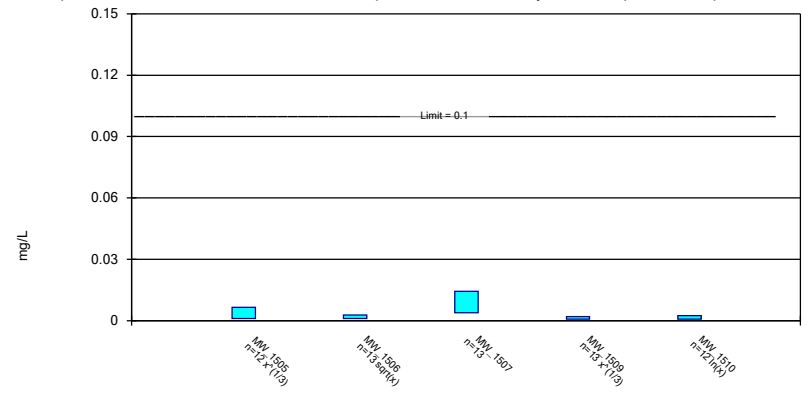
Compliance Limit is not exceeded. Per-well alpha = 0.01.



Constituent: Cadmium, total Analysis Run 12/23/2019 1:58 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval

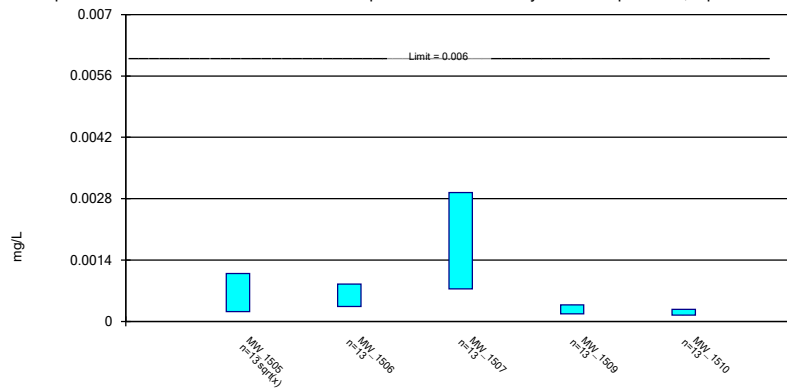
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Chromium, total Analysis Run 12/23/2019 1:58 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval

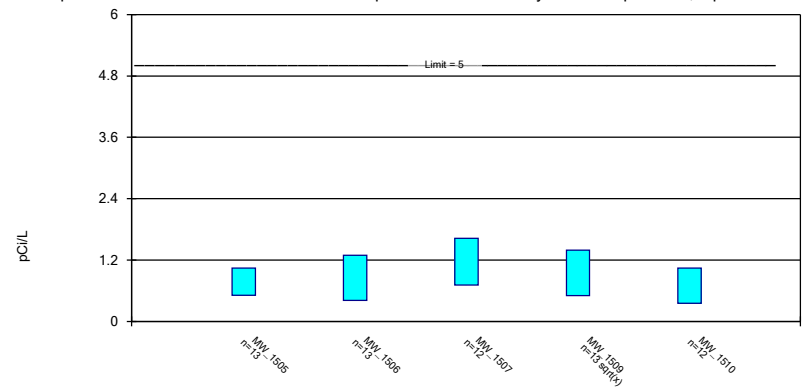
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Cobalt, total Analysis Run 12/23/2019 1:58 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval

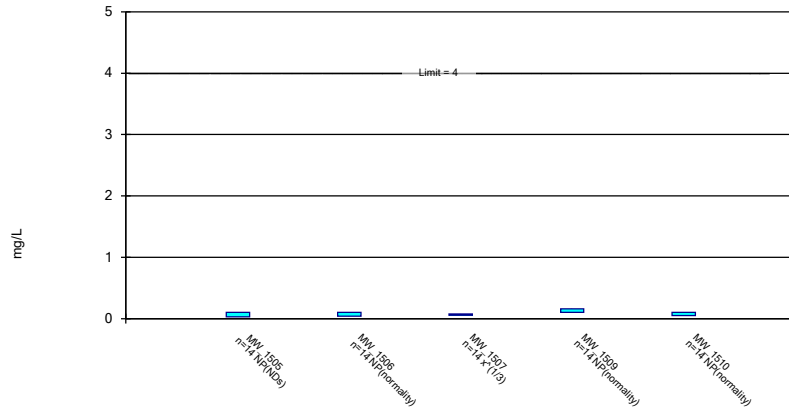
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Combined Radium 226 + 228 Analysis Run 12/23/2019 1:58 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval

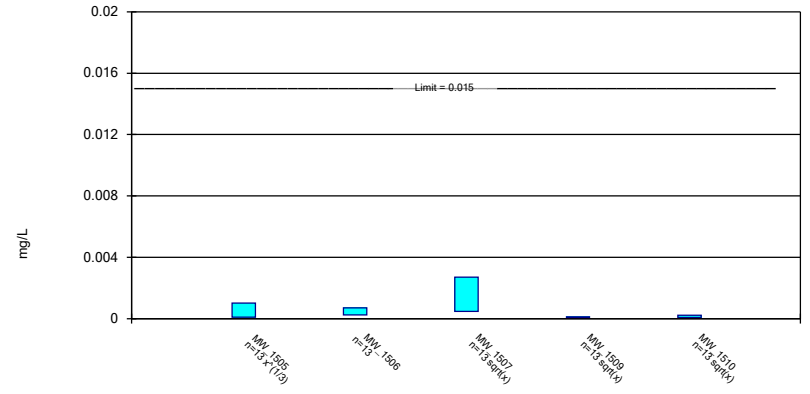
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Fluoride, total Analysis Run 12/23/2019 1:58 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval

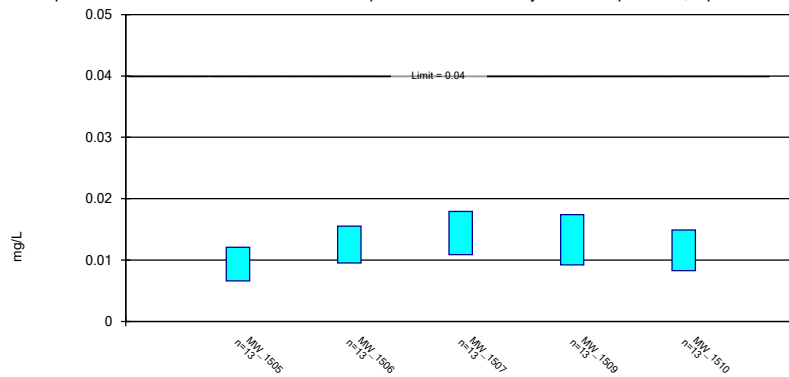
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Lead, total Analysis Run 12/23/2019 1:58 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval

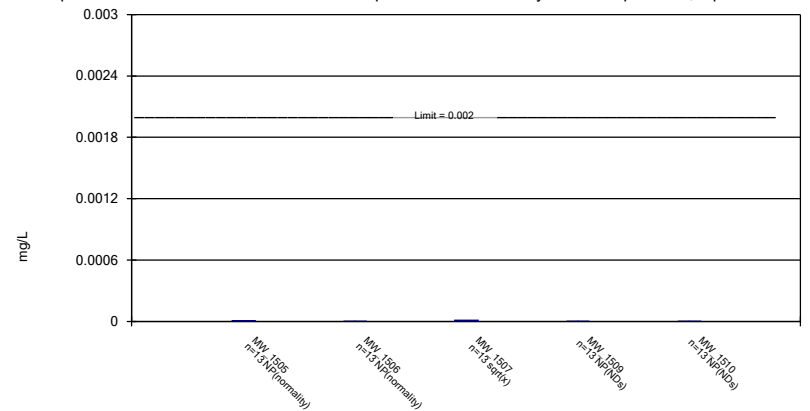
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Lithium, total Analysis Run 12/23/2019 1:58 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval

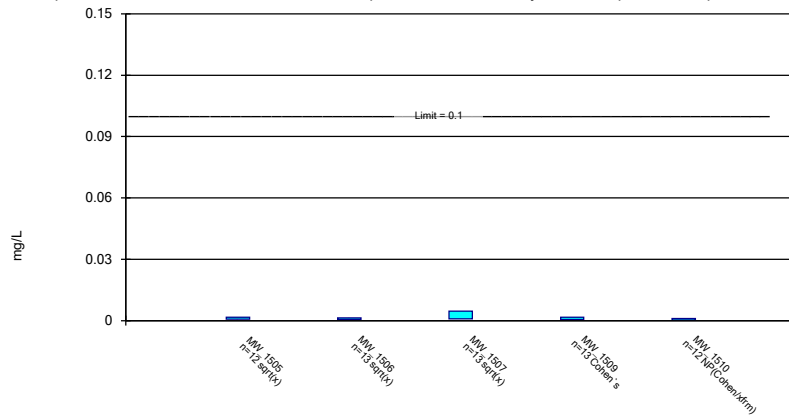
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Mercury, total Analysis Run 12/23/2019 1:58 PM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval

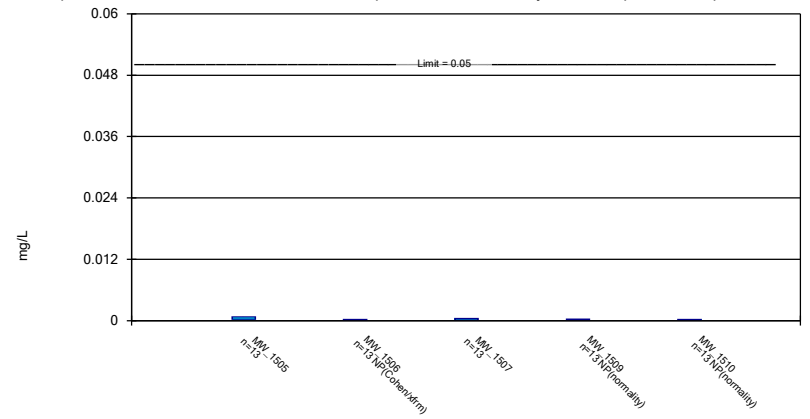
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Molybdenum, total Analysis Run 12/23/2019 1:58 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval

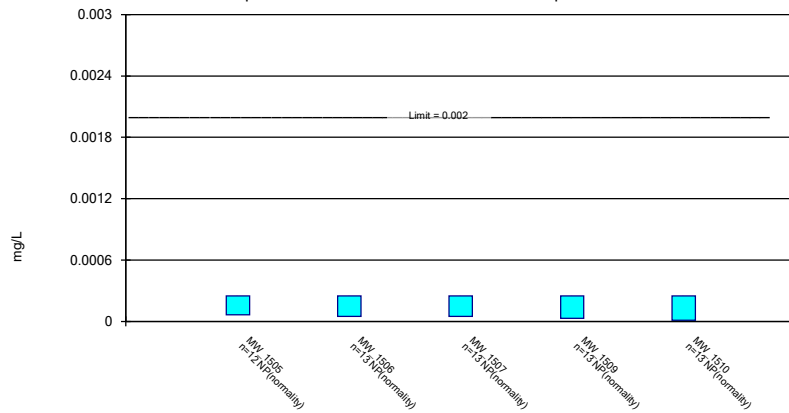
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Selenium, total Analysis Run 12/23/2019 1:58 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Non-Parametric Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01.



Constituent: Thallium, total Analysis Run 12/23/2019 1:58 PM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

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

Submitted to



1 Riverside Plaza
Columbus, Ohio 43215-2372

Submitted by



engineers | scientists | innovators

941 Chatham Lane
Suite 103
Columbus, Ohio 43221

August 24, 2020

CHA8500

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LIST OF ACRONYMS AND ABBREVIATIONS

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

SECTION 1

EXECUTIVE SUMMARY

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

Based on detection monitoring conducted in 2017 and 2018, statistically significant increases (SSIs) over background were concluded for boron, calcium, chloride, and total dissolved solids (TDS), at the BAP. An alternative source was not identified following the detection monitoring events; thus, the BAP has been in assessment monitoring since 2018. During the most recent assessment monitoring event, completed in October 2019, Appendix III detections of boron, calcium, chloride, fluoride, sulfate, and TDS were observed above background levels and the unit remained in assessment monitoring. The statistical summary of the results of the May 2020 assessment sampling event are documented in this report.

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

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

SECTION 2

BOTTOM ASH POND EVALUATION

2.1 Data Validation & QA/QC

During the assessment monitoring program, two sets of samples were collected for analysis from each upgradient and downgradient well to meet the requirements of 40 CFR 257.95(b) (March 2020) and 257.95(d)(1) (May 2020). Samples from the May 2020 sample event were analyzed for all Appendix III and Appendix IV parameters, whereas samples from the March 2020 event the were analyzed for Appendix IV parameters only. A summary of data collected during these assessment monitoring events may be found in Table 1.

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

The analytical data were imported into a Microsoft Access database, where checks were completed to assess the accuracy of sample location identification and analyte identification. Where necessary, unit conversions were applied to standardize reported units across all sampling events. Exported data files were created for use with the Sanitas™ v.9.6.25 statistics software. The export file was checked against the analytical data for transcription errors and completeness. No QA/QC issues were noted which would impact data usability.

2.2 Statistical Analysis

Statistical analyses for the BAP were conducted in accordance with the January 2017 *Statistical Analysis Plan* (AEP, 2017), except where noted below. Time series plots and results for all completed statistical tests are provided in Attachment B.

The data obtained in March and May 2020 were screened for potential outliers; however, no outliers were identified in either set of data (Attachment B).

2.2.1 Establishment of GWPSs

A GWPS was established for each Appendix IV parameter in accordance with 40 CFR 257.95(h) and the *Statistical Analysis Plan* (AEP, 2017). The established GWPS was determined to be the greater value of the background concentration and the maximum contaminant level (MCL) or risk-based level specified in 40 CFR 257.95(h)(2) for each Appendix IV parameter. To determine background concentrations, an upper tolerance limit (UTL) was calculated using pooled data from the background wells collected during the background monitoring and assessment monitoring events. Generally, tolerance limits were calculated parametrically with 95% coverage and 95%

confidence. Non-parametric tolerance limits were calculated for antimony, beryllium, cadmium, fluoride, and thallium due to apparent non-normal distributions. Non-parametric tolerance limits were calculated for mercury because greater than 50% of the data was non-detect results. Tolerance limits and the final GWPSs are summarized in Table 2.

2.2.2 Evaluation of Potential Appendix IV SSLs

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

No SSLs were identified at the Mitchell BAP.

2.2.3 Evaluation of Potential Appendix III SSIs

The Appendix III results were analyzed to assess whether concentrations of Appendix III parameters at the compliance wells exceeded background concentrations. Data collected during the May 2020 assessment monitoring events from each compliance well were compared to the prediction limits to assess whether the results are above background values. The results from these events and the prediction limits are summarized in Table 3. The following exceedances of the upper prediction limits (UPLs) were noted:

- Boron concentrations exceeded the interwell UPL of 1.36 mg/L at MW-1505 (7.36 mg/L), MW-1506 (4.07 mg/L), MW-1507 (7.72 mg/L), MW-1509 (10.6 mg/L), and MW-1510 (9.14 mg/L).
- Calcium concentrations exceeded the interwell UPL of 240 mg/L at MW-1505 (282 mg/L), MW-1506 (290 mg/L), MW-1507 (262 mg/L), and MW-1509 (262 mg/L).
- Chloride concentrations exceeded the interwell UPL of 238 mg/L at MW-1505 (252 mg/L), MW-1506 (379 mg/L), MW-1507 (310 mg/L), MW-1509 (331 mg/L), and MW-1510 (252 mg/L).
- Sulfate concentrations exceeded the intrawell UPL of 469 mg/L at MW-1505 (471 mg/L), and at MW-1510 (484 mg/L).
- TDS concentrations exceeded the interwell UPL of 1180 mg/L at MW-1505 (1460 mg/L), MW-1506 (1530 mg/L), MW-1507 (1330 mg/L), MW-1509 (1390 mg/L), and MW-1510 (1440 mg/L).

While the prediction limits were calculated for a one-of-two retesting procedure, SSIs were conservatively assumed if the May 2020 sample was above the UPL or below the LPL. Based on

this evaluation, concentrations of Appendix III constituents appear to be above background concentrations and the unit will remain in assessment monitoring.

2.3 Conclusions

A semi-annual assessment monitoring event was conducted in accordance with the CCR Rule. The laboratory and field data were reviewed prior to statistical analysis, with no QA/QC issues identified that impacted data usability. A review of outliers identified no potential outliers in the May 2020 data. GWPSs were re-established for the Appendix IV parameters. A confidence interval was constructed at each compliance well for each Appendix IV parameter; SSLs were concluded if the entire confidence interval exceeded the GWPSs. No SSLs were identified.

The Appendix III results were evaluated to assess whether concentrations of Appendix III parameters exceeded background levels. Boron, calcium, chloride, sulfate, and TDS results exceeded background levels at select downgradient wells.

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

SECTION 3

REFERENCES

American Electric Power (AEP). 2017. Statistical Analysis Plan – Mitchell Plant. January 2017.

Geosyntec Consultants (Geosyntec). 2018. Statistical Analysis Summary – Bottom Ash Pond, Mitchell Plant, Moundsville, West Virginia. January 15, 2018.

TABLES

**Table 1 - Groundwater Data Summary
Mitchell Plant - Bottom Ash Pond**

| Parameter | Unit | MW-1504 | | MW-1505 | | MW-1506 | | MW-1507 | | MW-1508 | | MW-1509 | | MW-1510 | |
|------------------------|-------|-----------|----------|-----------|----------|-----------|----------|-----------|----------|-----------|----------|-----------|----------|-----------|----------|
| | | 3/17/2020 | 5/5/2020 | 3/17/2020 | 5/5/2020 | 3/17/2020 | 5/5/2020 | 3/18/2020 | 5/5/2020 | 3/18/2020 | 5/6/2020 | 3/18/2020 | 5/5/2020 | 3/18/2020 | 5/6/2020 |
| Antimony | µg/L | 0.1 U | 0.1 U | 0.1 U | 0.03 J | 0.1 U | 0.02 J | 0.1 U | 0.03 J | 0.1 U | 0.1 U | 0.1 U | 0.03 J | 0.1 U | 0.1 U |
| Arsenic | µg/L | 0.29 | 0.26 | 0.31 | 0.27 | 0.44 | 0.33 | 0.44 | 0.42 | 0.52 | 0.44 | 0.42 | 0.27 | 0.31 | 0.29 |
| Barium | µg/L | 48.3 | 43.8 | 42.8 | 48.4 | 53.0 | 52.2 | 53.0 | 53.1 | 36.2 | 35.4 | 45.8 | 43.7 | 38.0 | 36.7 |
| Beryllium | µg/L | 0.1 U | 0.1 U | 0.1 U | 0.1 U | 0.1 U | 0.1 U | 0.1 U | 0.1 U | 0.1 U | 0.1 U | 0.1 U | 0.1 U | 0.1 U | 0.1 U |
| Boron | mg/L | - | 0.04 J | - | 7.36 | - | 4.07 | - | 7.72 | - | 0.486 | - | 10.6 | - | 9.14 |
| Cadmium | µg/L | 0.03 J | 0.03 J | 0.02 J | 0.03 J | 0.01 J | 0.01 J | 0.03 J | 0.03 J | 0.03 J | 0.03 J | 0.05 U | 0.05 U | 0.05 U | 0.05 U |
| Calcium | mg/L | - | 230 | - | 282 | - | 290 | - | 262 | - | 198 | - | 262 | - | 228 |
| Chloride | mg/L | - | 96.2 | - | 252 | - | 379 | - | 310 | - | 148 | - | 331 | - | 252 |
| Chromium | µg/L | 0.238 | 0.238 | 0.624 | 0.291 | 4.24 | 0.592 | 2.69 | 1.30 | 0.820 | 0.654 | 0.518 | 0.633 | 2.10 | 0.886 |
| Cobalt | µg/L | 0.04 J | 0.03 J | 0.100 | 0.096 | 0.393 | 0.162 | 0.342 | 0.345 | 0.481 | 0.413 | 0.144 | 0.092 | 0.121 | 0.109 |
| Combined Radium | pCi/L | 0.442 | 0.758 | 0.715 | 0.791 | 2 U | 0.478 | 0.381 | 0.836 | 0.636 | 0.593 | 0.551 | 1.20 | 0.864 | 0.737 |
| Fluoride | mg/L | 0.15 | 0.12 | 0.03 J | 0.02 J | 0.04 J | 0.03 J | 0.07 | 0.05 J | 0.08 | 0.06 | 0.13 | 0.10 | 0.11 | 0.10 |
| Lead | µg/L | 0.2 U | 0.2 U | 0.2 U | 0.2 U | 0.213 | 0.2 J | 0.217 | 0.208 | 0.298 | 0.311 | 0.2 J | 0.05 J | 0.08 J | 0.07 J |
| Lithium | mg/L | 0.00441 | 0.00442 | 0.00501 | 0.00493 | 0.00825 | 0.00782 | 0.00794 | 0.00757 | 0.00484 | 0.00483 | 0.00934 | 0.00897 | 0.00808 | 0.00750 |
| Mercury | µg/L | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U |
| Molybdenum | µg/L | 2 U | 2 U | 2 U | 2 U | 1 J | 0.7 J | 0.8 J | 0.7 J | 0.8 J | 0.7 J | 2 U | 0.6 J | 2 U | 2 U |
| Selenium | µg/L | 7.3 | 3.8 | 0.06 J | 0.06 J | 0.09 J | 0.2 U | 0.06 J | 0.08 J | 0.1 J | 0.1 J | 0.07 J | 0.1 J | 0.2 J | 0.2 J |
| Sulfate | mg/L | - | 372 | - | 471 | - | 337 | - | 350 | - | 273 | - | 402 | - | 484 |
| Thallium | µg/L | 0.5 U | 0.5 U | 0.5 U | 0.5 U | 0.5 U | 0.5 U | 0.5 U | 0.5 U | 0.5 U | 0.5 U | 0.5 U | 0.5 U | 0.5 U | 0.5 U |
| Total Dissolved Solids | mg/L | - | 1,020 | - | 1,460 | - | 1,530 | - | 1,330 | - | 947 | - | 1,390 | - | 1,440 |
| pH | SU | 7.1 | 7.5 | 7.2 | 7.5 | 7.3 | 7.5 | 7.2 | 7.4 | 7.2 | 7.2 | 7.3 | 7.4 | 7.4 | 7.4 |

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

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

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

-: Not sampled

**Table 2: Groundwater Protection Standards
Mitchell Plant - Bottom Ash Pond**

| Constituent Name | MCL | CCR Rule-Specified | Background Limit | GWPS |
|--------------------------------|-------|--------------------|------------------|-------|
| Antimony, Total (mg/L) | 0.006 | | 0.00010 | 0.006 |
| Arsenic, Total (mg/L) | 0.01 | | 0.00193 | 0.01 |
| Barium, Total (mg/L) | 2 | | 0.055 | 2 |
| Beryllium, Total (mg/L) | 0.004 | | 0.0001 | 0.004 |
| Cadmium, Total (mg/L) | 0.005 | | 0.00009 | 0.005 |
| Chromium, Total (mg/L) | 0.1 | | 0.0023 | 0.1 |
| Cobalt, Total (mg/L) | n/a | 0.006 | 0.0030 | 0.006 |
| Combined Radium, Total (pCi/L) | 5 | | 1.97 | 5 |
| Fluoride, Total (mg/L) | 4 | | 0.25 | 4 |
| Lead, Total (mg/L) | 0.015 | | 0.0029 | 0.015 |
| Lithium, Total (mg/L) | n/a | 0.04 | 0.02116 | 0.04 |
| Mercury, Total (mg/L) | 0.002 | | 0.000008 | 0.002 |
| Molybdenum, Total (mg/L) | n/a | 0.1 | 0.0018 | 0.1 |
| Selenium, Total (mg/L) | 0.05 | | 0.005 | 0.05 |
| Thallium, Total (mg/L) | 0.002 | | 0.0005 | 0.002 |

Notes:

MCL = Maximum Contaminant Level

RSL = Regional Screening Level

GWPS = Groundwater Protection Standard

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

The higher of the calculated UTL or MCL/Rule-Specified Level is used as the GWPS.

**Table 3: Appendix III Data Summary
Mitchell Plant - Bottom Ash Pond**

| Analyte | Unit | Description | MW-1504 | MW-1505 | MW-1506 | MW-1507 | MW-1509 | MW-1510 |
|------------------------|------|----------------------------------|----------|--------------|--------------|--------------|--------------|--------------|
| | | | 5/5/2020 | 5/5/2020 | 5/5/2020 | 5/5/2020 | 5/5/2020 | 5/6/2020 |
| Boron | mg/L | Interwell Background Value (UPL) | 1.36 | | | | | |
| | | Analytical Result | 0.04 | 7.36 | 4.07 | 7.72 | 10.6 | 9.14 |
| Calcium | mg/L | Interwell Background Value (UPL) | 240 | | | | | |
| | | Analytical Result | 230 | 282 | 290 | 262 | 262 | 228 |
| Chloride | mg/L | Interwell Background Value (UPL) | 238 | | | | | |
| | | Analytical Result | 96.2 | 252 | 379 | 310 | 331 | 252 |
| Fluoride | mg/L | Intrawell Background Value (UPL) | 0.298 | | | | | |
| | | Analytical Result | 0.12 | 0.02 | 0.03 | 0.05 | 0.10 | 0.10 |
| pH | SU | Interwell Background Value (UPL) | 8.2 | | | | | |
| | | Interwell Background Value (LPL) | 6.9 | | | | | |
| | | Analytical Result | 7.5 | 7.5 | 7.5 | 7.4 | 7.4 | 7.4 |
| Sulfate | mg/L | Intrawell Background Value (UPL) | 469 | | | | | |
| | | Analytical Result | 372 | 471 | 337 | 350 | 402 | 484 |
| Total Dissolved Solids | mg/L | Interwell Background Value (UPL) | 1,180 | | | | | |
| | | Analytical Result | 1,020 | 1,460 | 1,530 | 1,330 | 1,390 | 1,440 |

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

Bold values exceed the background value.

Background values are shaded gray.

ATTACHMENT A

Certification by Qualified Professional Engineer

Certification by Qualified Professional Engineer

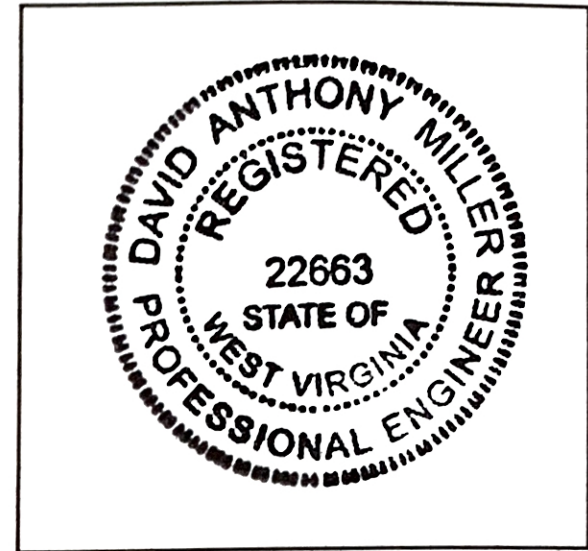
I certify that the selected and above described statistical method is appropriate for evaluating the groundwater monitoring data for the Mitchell Bottom Ash Pond CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER

Printed Name of Licensed Professional Engineer

David Anthony Miller

Signature



22663

License Number

WEST VIRGINIA

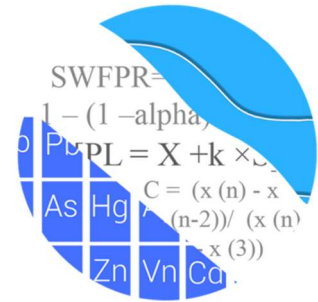
Licensing State

08.24.2020

Date

ATTACHMENT B
Statistical Analysis Output

GROUNDWATER STATS CONSULTING



June 16, 2020

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

RE: Mitchell Bottom Ash Pond (BAP)
Assessment Statistics - May 2020 Sample Event

Dear Ms. Kreinberg,

Groundwater Stats Consulting, formerly the statistical consulting division of Sanitas Technologies, is pleased to provide the groundwater Assessment Monitoring statistics for the May 2020 sample event for American Electric Power Company's Mitchell Bottom Ash Pond. The analysis complies with the federal rule for the Disposal of Coal Combustion Residuals from Electric Utilities (CCR Rule, 2015) as well as with the USEPA Unified Guidance (2009).

Sampling at each of the wells below began at Mitchell Bottom Ash Pond for the CCR program in 2016. The monitoring well network, as provided by Geosyntec Consultants, consists of the following: upgradient wells MW-1504 and MW-1508; and downgradient wells MW-1505, MW-1506, MW-1507, MW-1509, and MW-1510.

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

The CCR program consists of the following Assessment Monitoring constituents:

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

Time series graphs and box plots for these parameters are provided for all wells and constituents; and are used to evaluate concentrations over the entire record as well as view variation within and across wells (Figures A and B).

All data were screened during previous analyses for outliers using Tukey's outlier test and visual screening. When values are identified as outliers, they are flagged in the database with "o" and are deselected prior to construction of statistical limits. A list of all flagged outliers follows this letter (Figure C). Additionally, flagged data are displayed in a lighter font and as a disconnected symbol on the time series reports, as well as in a lighter font on the accompanying data pages.

Evaluation of Appendix IV Parameters

Interwell tolerance limits were used to calculate the site-specific background limits from pooled upgradient well data with for the Appendix IV constituents discussed above (Figure D). Parametric tolerance limits are calculated, with a target of 95% confidence and 95% coverage, when data follow a normal or transformed-normal distribution such as for arsenic, barium, chromium, cobalt, combined radium 226 + 228, lead, lithium, molybdenum, and selenium. When data contained greater than 50% nondetects or did not follow a normal or transformed-normal distribution, non-parametric tolerance limits were used. The confidence and coverage levels for nonparametric tolerance limits are dependent upon the number of background samples. These limits were compared to the Maximum Contaminant Levels (MCLs) and the CCR-Rule specified levels in the Groundwater Protection Standards (GWPS) table following this letter to determine the highest limit for use as the GWPS in the Confidence Interval comparisons (Figure E).

Confidence intervals were then constructed on downgradient wells for each of the Appendix IV parameters using the highest limit of either the MCL, CCR-Rule specified, or background as discussed above (Figure F). Only when the entire confidence interval is above a GWPS is the well/constituent pair considered to exceed its respective standard. No confidence interval exceedances were noted for any of the Appendix IV parameters. A summary of the confidence interval results follows this letter.

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

For Groundwater Stats Consulting,

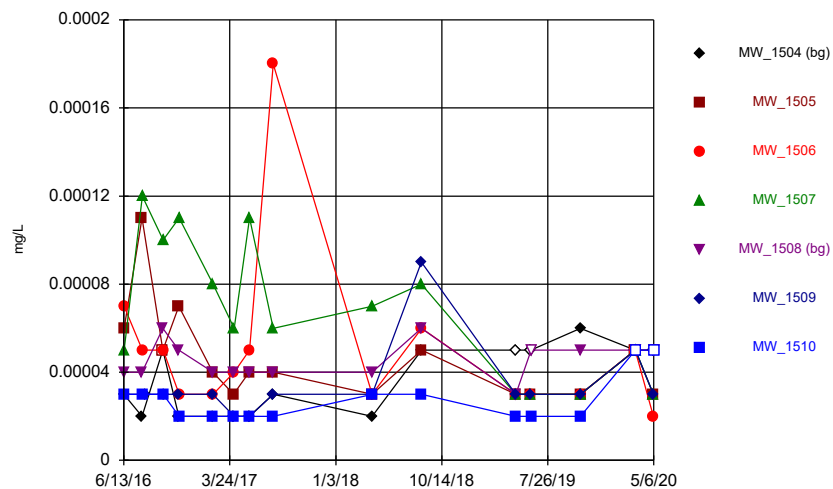
A handwritten signature in black ink, appearing to read 'Easton Rayner', with a long horizontal flourish extending to the right.

Easton Rayner
Groundwater Analyst

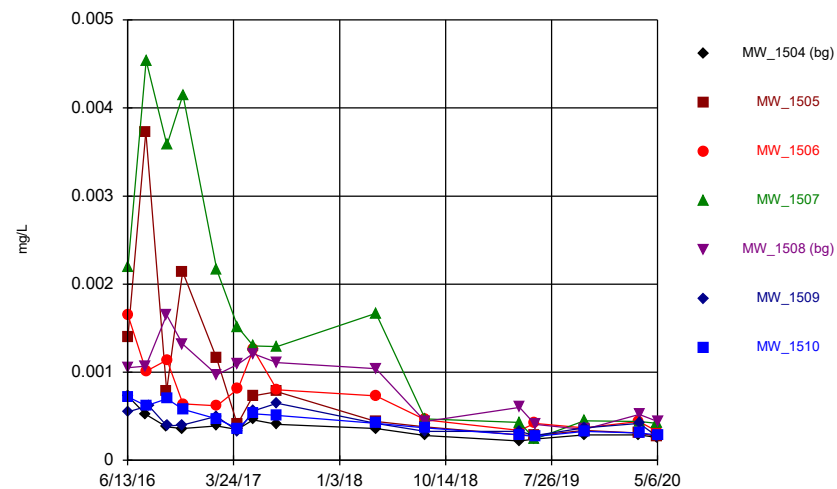
A handwritten signature in black ink, appearing to read 'Kristina Rayner', written in a cursive style.

Kristina L. Rayner
Groundwater Statistician

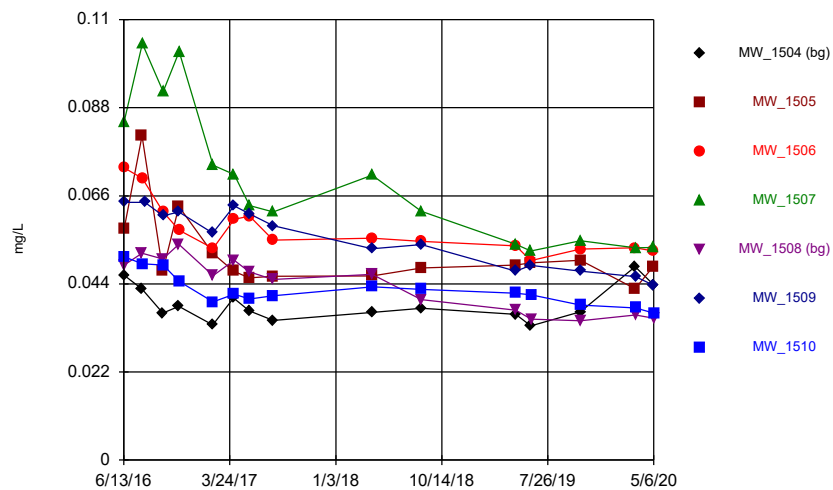
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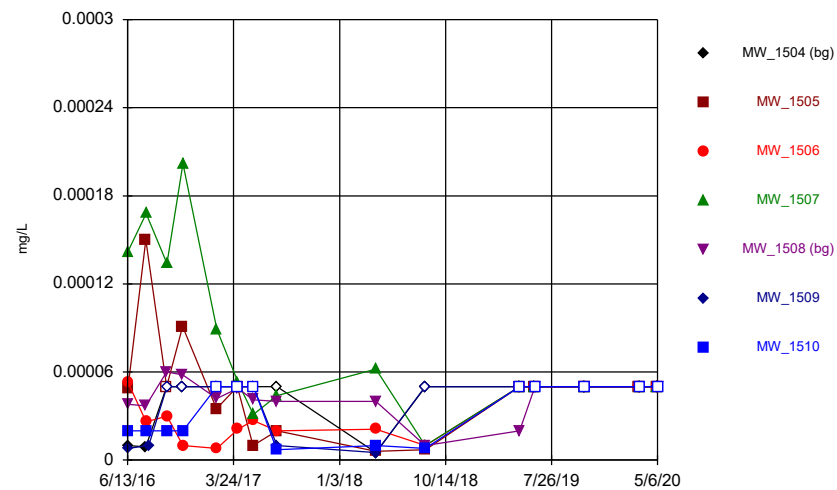
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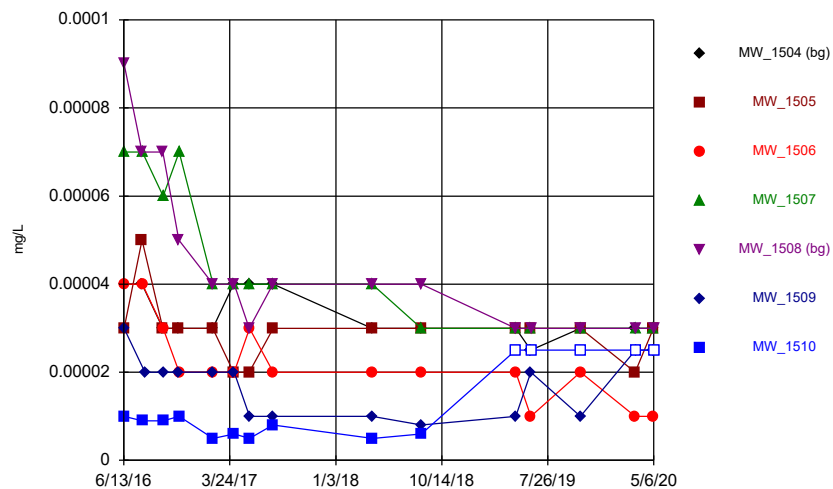
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Time Series

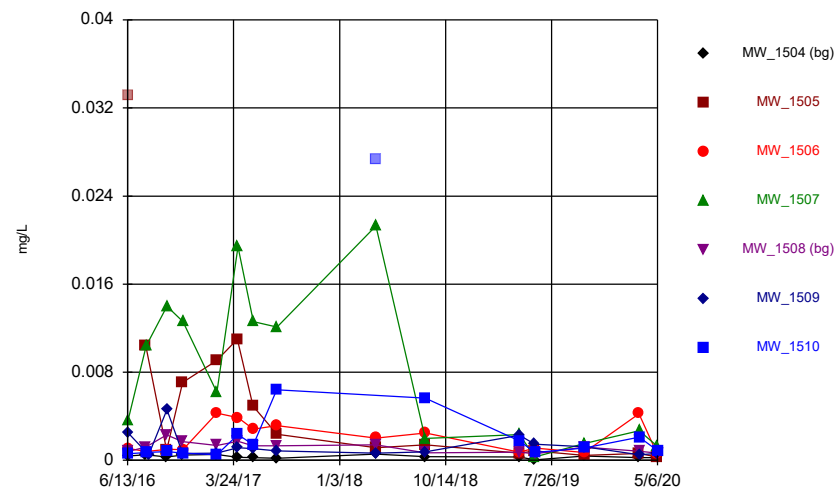


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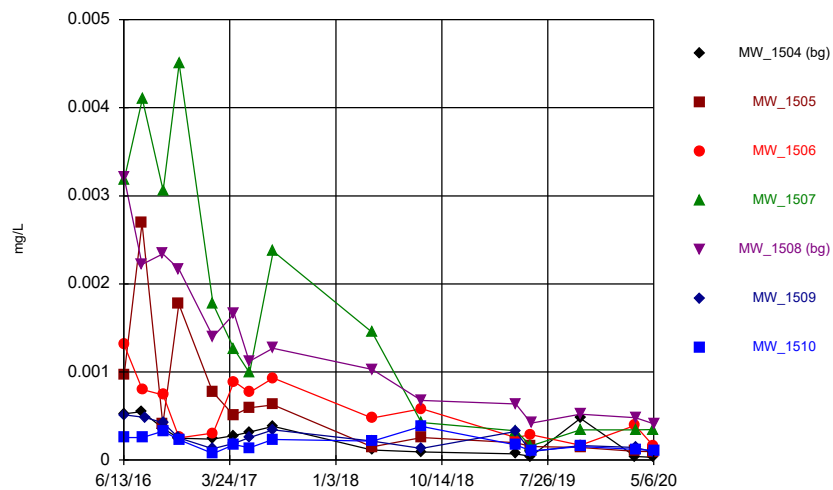
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Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Time Series



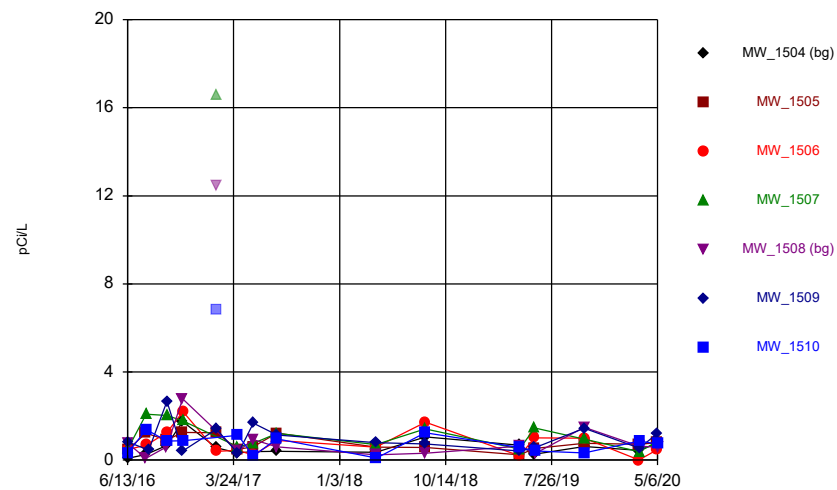
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Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Time Series



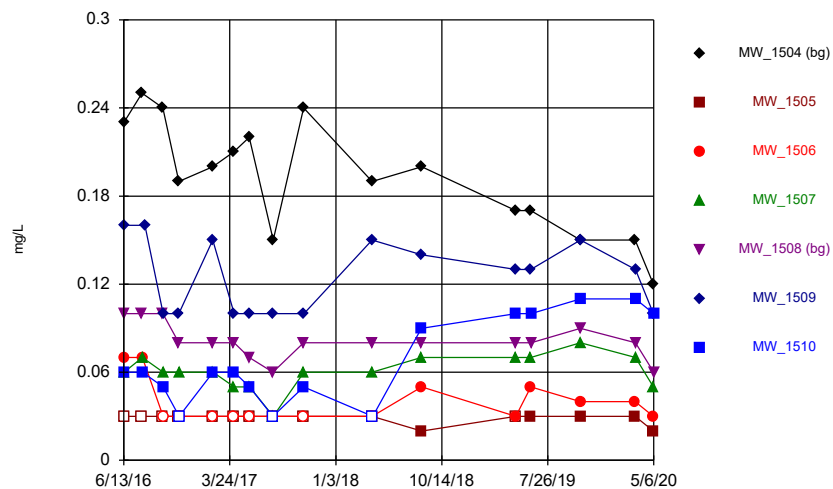
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Time Series



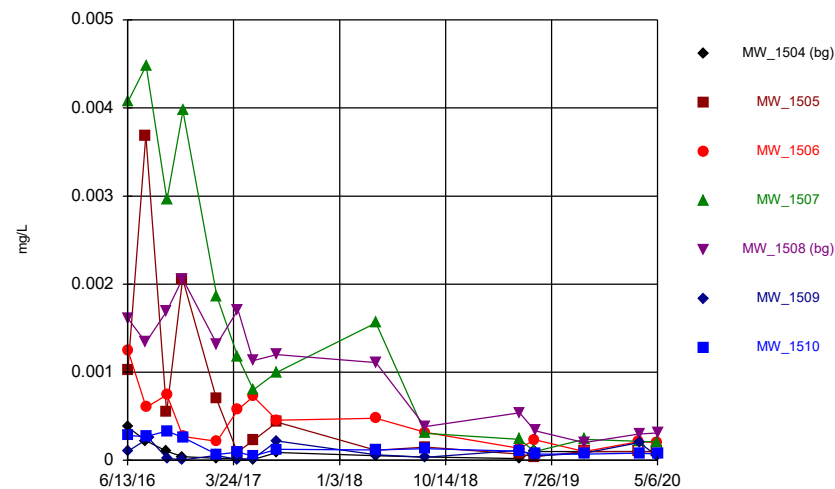
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Time Series



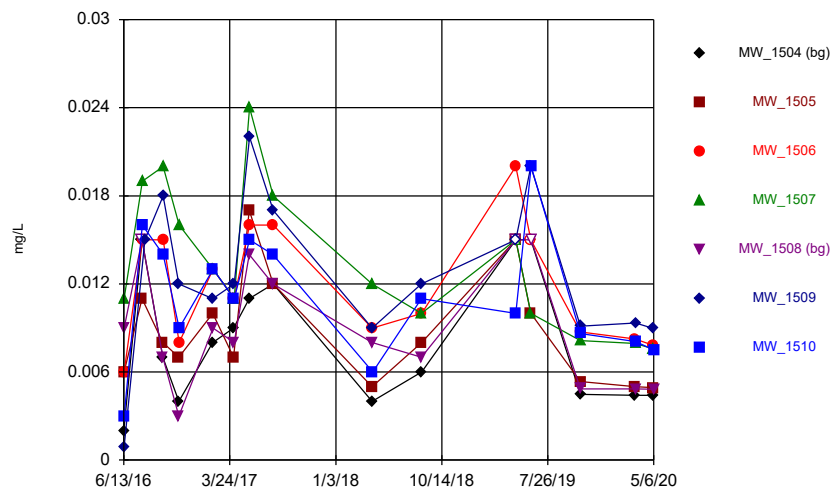
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Time Series



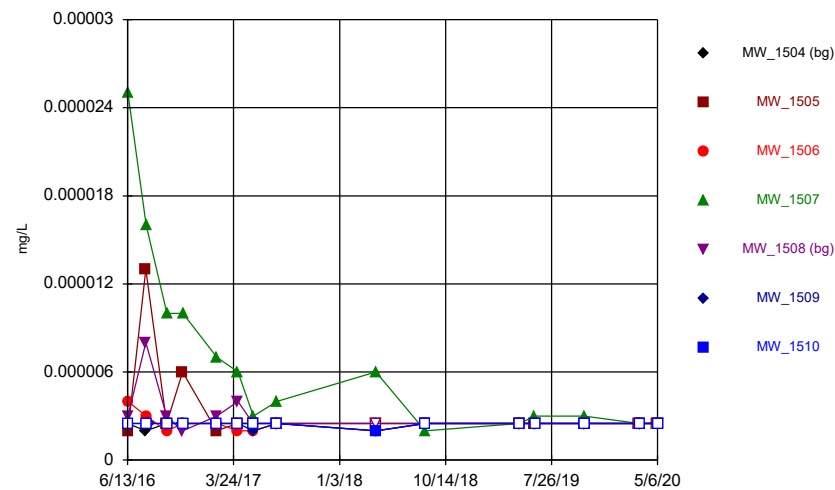
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Time Series



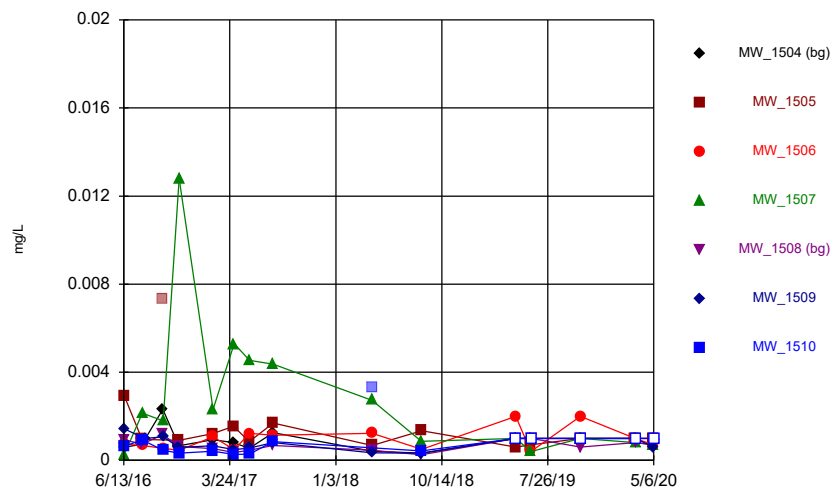
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Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Time Series



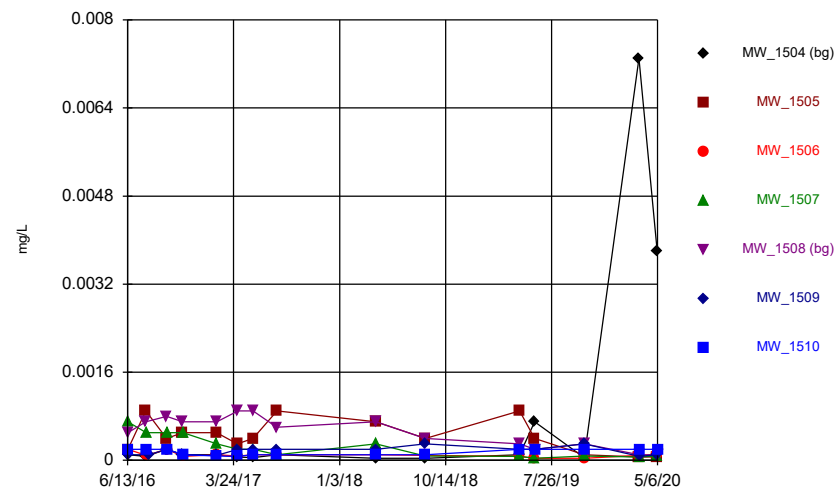
Constituent: Mercury, total Analysis Run 6/11/2020 8:55 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Time Series



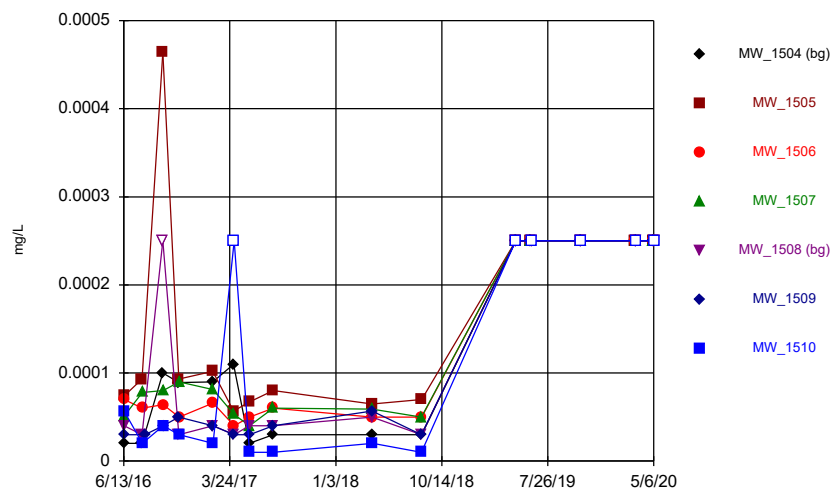
Constituent: Molybdenum, total Analysis Run 6/11/2020 8:55 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Time Series



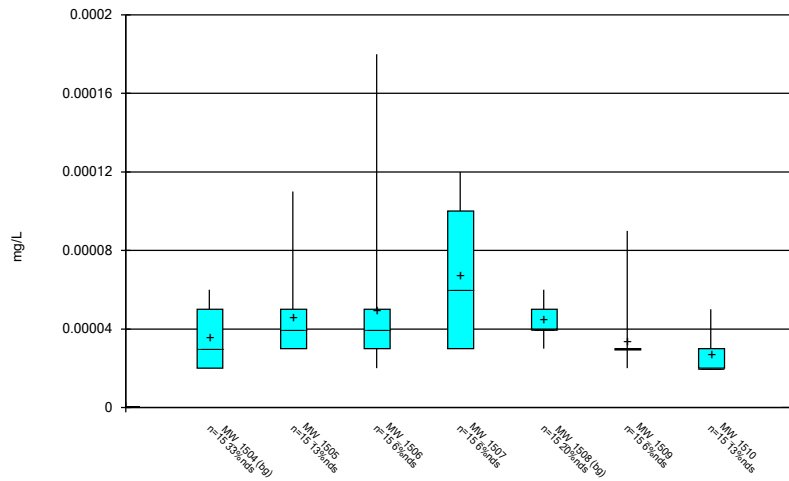
Constituent: Selenium, total Analysis Run 6/11/2020 8:55 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Time Series



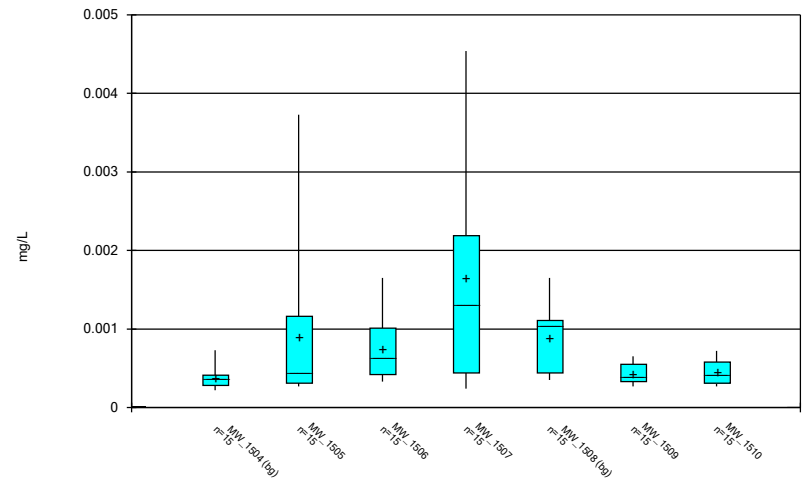
Constituent: Thallium, total Analysis Run 6/11/2020 8:55 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



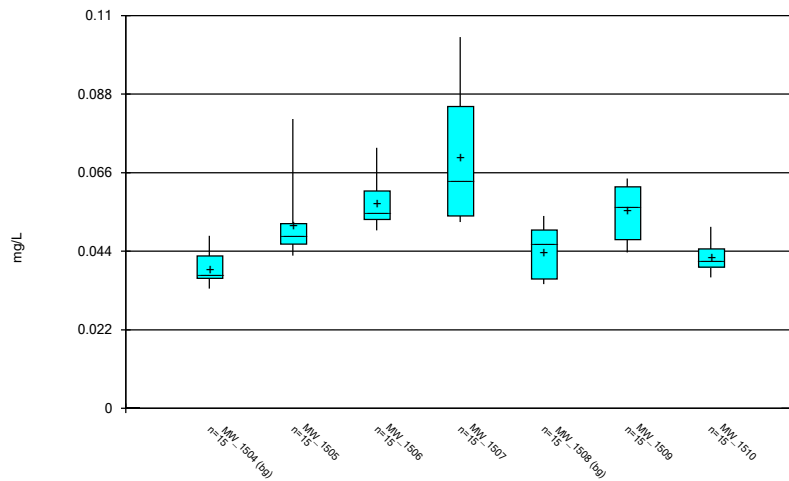
Constituent: Antimony, total Analysis Run 6/11/2020 8:55 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



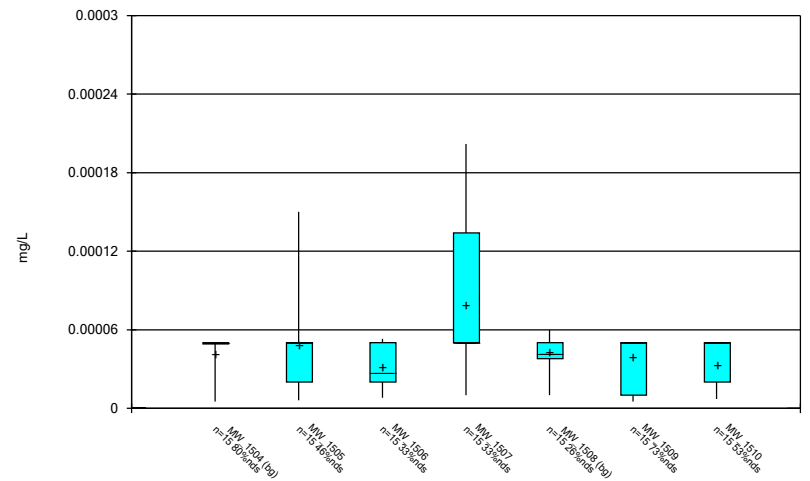
Constituent: Arsenic, total Analysis Run 6/11/2020 8:56 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



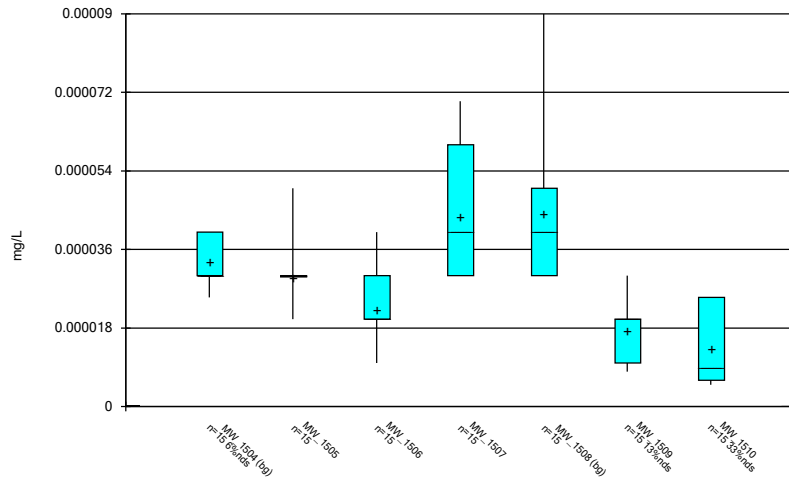
Constituent: Barium, total Analysis Run 6/11/2020 8:56 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



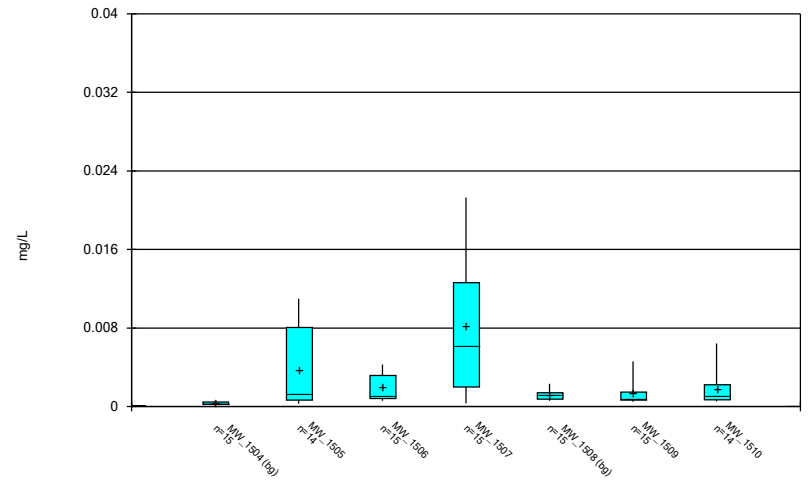
Constituent: Beryllium, total Analysis Run 6/11/2020 8:56 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



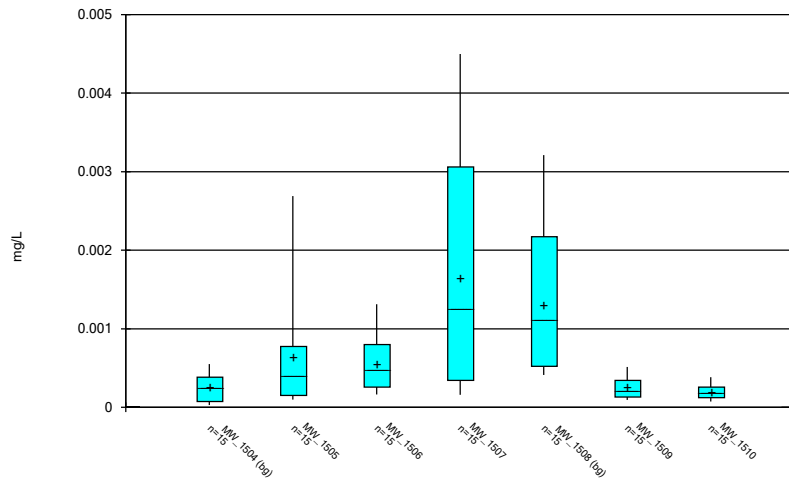
Constituent: Cadmium, total Analysis Run 6/11/2020 8:56 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



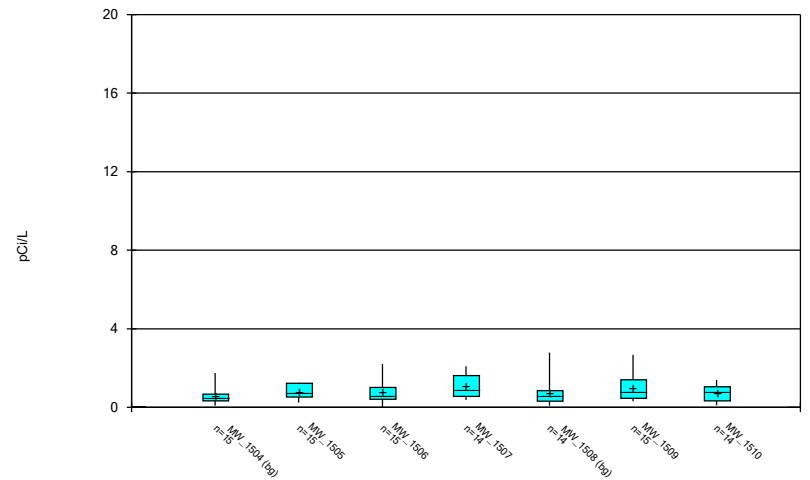
Constituent: Chromium, total Analysis Run 6/11/2020 8:56 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



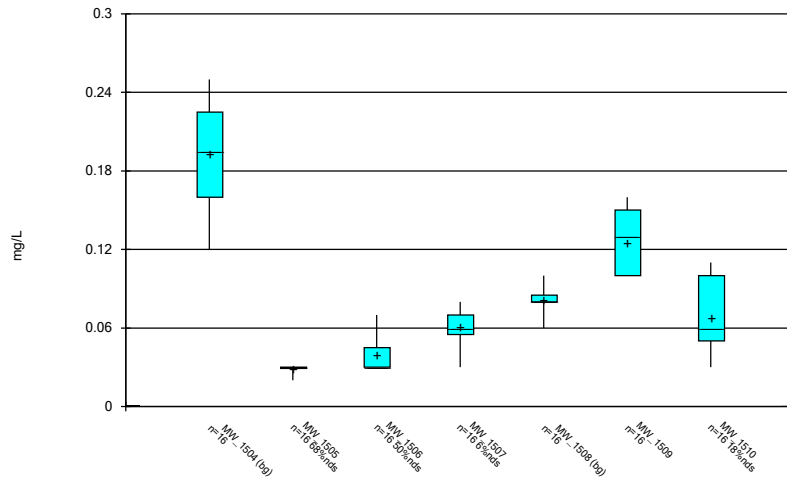
Constituent: Cobalt, total Analysis Run 6/11/2020 8:56 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



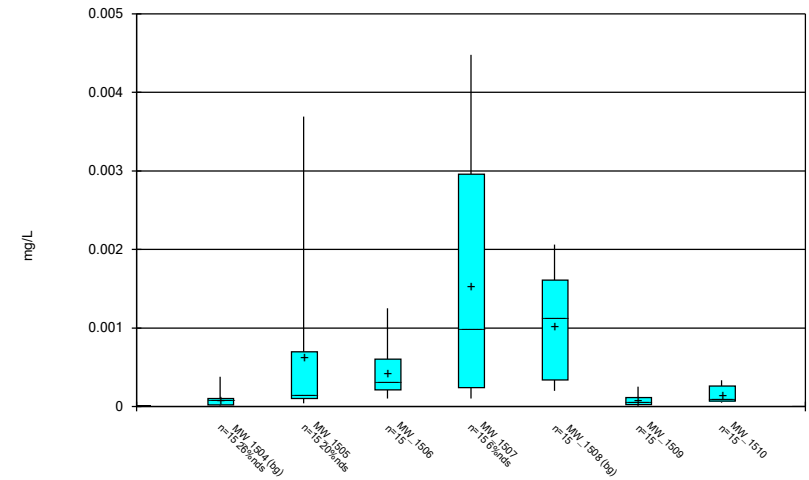
Constituent: Combined Radium 226 + 228 Analysis Run 6/11/2020 8:56 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



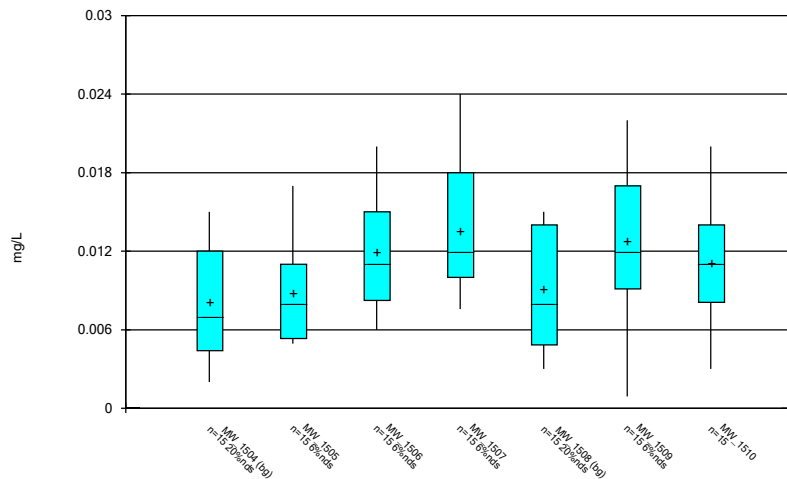
Constituent: Fluoride, total Analysis Run 6/11/2020 8:56 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



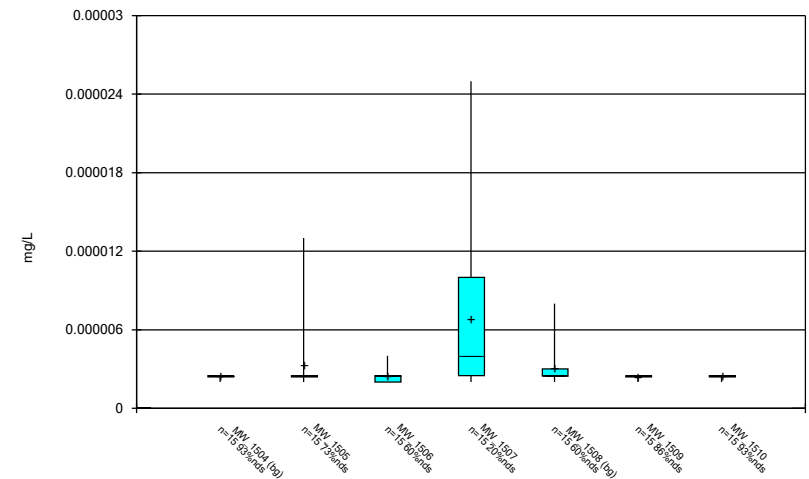
Constituent: Lead, total Analysis Run 6/11/2020 8:56 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



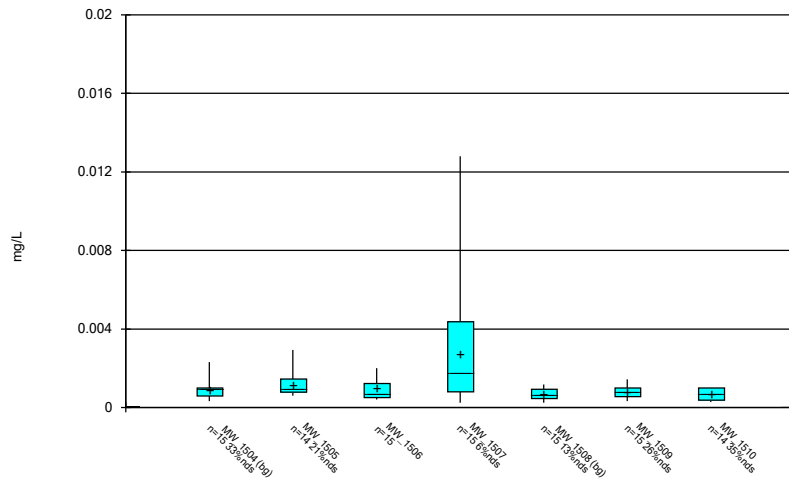
Constituent: Lithium, total Analysis Run 6/11/2020 8:56 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



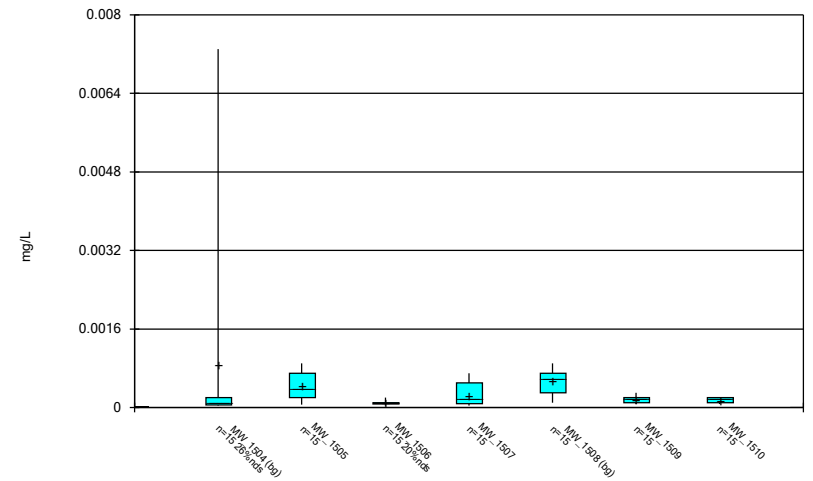
Constituent: Mercury, total Analysis Run 6/11/2020 8:56 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



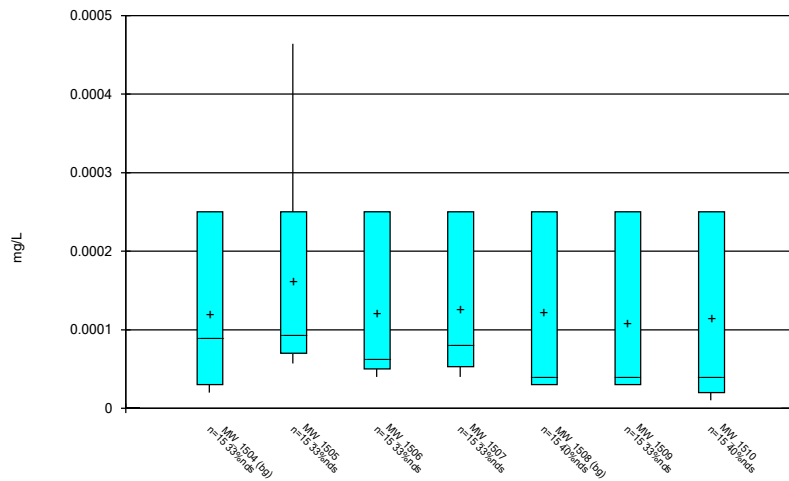
Constituent: Molybdenum, total Analysis Run 6/11/2020 8:56 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



Constituent: Selenium, total Analysis Run 6/11/2020 8:56 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Box & Whiskers Plot



Constituent: Thallium, total Analysis Run 6/11/2020 8:56 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Outliers

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 6/11/2020, 9:03 AM

| | MW_1505 Chromium, total (mg/L) | MW_1510 Chromium, total (mg/L) | MW_1507 Combined Radium 226 + 228 (pCi/L) | MW_1508 Combined Radium 226 + 228 (pCi/L) | MW_1510 Combined Radium 226 + 228 (pCi/L) | MW_1505 Molybdenum, total (mg/L) | MW_1510 Molybdenum, total (mg/L) |
|-----------|--------------------------------|--------------------------------|-------------------------------------------|-------------------------------------------|-------------------------------------------|----------------------------------|----------------------------------|
| 6/14/2016 | 0.0332 (o) | | | | | | |
| 9/26/2016 | | | | | 0.00735 (o) | | |
| 2/8/2017 | | 16.587 (o) | 12.465 (o) | 6.828 (o) | | | |
| 4/12/2018 | 0.0274 (o) | | | | | 0.0033 (o) | |

Tolerance Limit Summary Table

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 6/16/2020, 1:55 AM

| <u>Constituent</u> | <u>Well</u> | <u>Upper Lim.</u> | <u>Date</u> | <u>Observ.</u> | <u>Sig.</u> | <u>Bg N</u> | <u>%NDs</u> | <u>Transform</u> | <u>Alpha</u> | <u>Method</u> |
|-----------------------------------|-------------|-------------------|-------------|----------------|-------------|-------------|-------------|------------------|--------------|--------------------|
| Antimony, total (mg/L) | n/a | 0.0001 | n/a | n/a | n/a | 30 | 26.67 | n/a | 0.2146 | NP Inter(normal... |
| Arsenic, total (mg/L) | n/a | 0.001931 | n/a | n/a | n/a | 30 | 0 | ln(x) | 0.05 | Inter |
| Barium, total (mg/L) | n/a | 0.055 | n/a | n/a | n/a | 30 | 0 | No | 0.05 | Inter |
| Beryllium, total (mg/L) | n/a | 0.0001 | n/a | n/a | n/a | 30 | 53.33 | n/a | 0.2146 | NP Inter(normal... |
| Cadmium, total (mg/L) | n/a | 0.00009 | n/a | n/a | n/a | 30 | 3.333 | n/a | 0.2146 | NP Inter(normal... |
| Chromium, total (mg/L) | n/a | 0.002286 | n/a | n/a | n/a | 30 | 0 | sqrt(x) | 0.05 | Inter |
| Cobalt, total (mg/L) | n/a | 0.002988 | n/a | n/a | n/a | 30 | 0 | sqrt(x) | 0.05 | Inter |
| Combined Radium 226 + 228 (pCi/L) | n/a | 1.973 | n/a | n/a | n/a | 29 | 0 | sqrt(x) | 0.05 | Inter |
| Fluoride, total (mg/L) | n/a | 0.25 | n/a | n/a | n/a | 32 | 0 | n/a | 0.1937 | NP Inter(normal... |
| Lead, total (mg/L) | n/a | 0.002896 | n/a | n/a | n/a | 30 | 13.33 | x^(1/3) | 0.05 | Inter |
| Lithium, total (mg/L) | n/a | 0.02116 | n/a | n/a | n/a | 30 | 20 | ln(x) | 0.05 | Inter |
| Mercury, total (mg/L) | n/a | 0.000008 | n/a | n/a | n/a | 30 | 76.67 | n/a | 0.2146 | NP Inter(NDs) |
| Molybdenum, total (mg/L) | n/a | 0.001756 | n/a | n/a | n/a | 30 | 23.33 | ln(x) | 0.05 | Inter |
| Selenium, total (mg/L) | n/a | 0.005006 | n/a | n/a | n/a | 30 | 13.33 | ln(x) | 0.05 | Inter |
| Thallium, total (mg/L) | n/a | 0.0005 | n/a | n/a | n/a | 30 | 36.67 | n/a | 0.2146 | NP Inter(normal... |

| MITCHELL BAP GWPS | | | | |
|--------------------------------|------------|---------------------------|-------------------------|-------------|
| Constituent Name | MCL | CCR-Rule Specified | Background Limit | GWPS |
| Antimony, Total (mg/L) | 0.006 | | 0.0001 | 0.006 |
| Arsenic, Total (mg/L) | 0.01 | | 0.001931 | 0.01 |
| Barium, Total (mg/L) | 2 | | 0.055 | 2 |
| Beryllium, Total (mg/L) | 0.004 | | 0.0001 | 0.004 |
| Cadmium, Total (mg/L) | 0.005 | | 0.00009 | 0.005 |
| Chromium, Total (mg/L) | 0.1 | | 0.002286 | 0.1 |
| Cobalt, Total (mg/L) | n/a | 0.006 | 0.002988 | 0.006 |
| Combined Radium, Total (pCi/L) | 5 | | 1.973 | 5 |
| Fluoride, Total (mg/L) | 4 | | 0.25 | 4 |
| Lead, Total (mg/L) | 0.015 | | 0.002896 | 0.015 |
| Lithium, Total (mg/L) | n/a | 0.04 | 0.02116 | 0.04 |
| Mercury, Total (mg/L) | 0.002 | | 0.000008 | 0.002 |
| Molybdenum, Total (mg/L) | n/a | 0.1 | 0.001756 | 0.1 |
| Selenium, Total (mg/L) | 0.05 | | 0.005006 | 0.05 |
| Thallium, Total (mg/L) | 0.002 | | 0.0005 | 0.002 |

**MCL = Maximum Contaminant Level*

**GWPS = Groundwater Protection Standard*

Confidence Interval - All Results (No Significant)

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 6/16/2020, 2:13 AM

| Constituent | Well | Upper Lim. | Lower Lim. | Compliance | Sig. | N | %NDs | Transform | Alpha | Method |
|-----------------------------------|---------|------------|------------|------------|------|----|-------|-----------|-------|------------------|
| Antimony, total (mg/L) | MW_1505 | 0.00006 | 0.00003 | 0.006 | No | 15 | 13.33 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW_1506 | 0.00006 | 0.00003 | 0.006 | No | 15 | 6.667 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW_1507 | 0.00008883 | 0.00004583 | 0.006 | No | 15 | 6.667 | No | 0.01 | Param. |
| Antimony, total (mg/L) | MW_1509 | 0.00005 | 0.00002 | 0.006 | No | 15 | 6.667 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW_1510 | 0.00005 | 0.00002 | 0.006 | No | 15 | 13.33 | No | 0.01 | NP (normality) |
| Arsenic, total (mg/L) | MW_1505 | 0.001088 | 0.0003622 | 0.01 | No | 15 | 0 | ln(x) | 0.01 | Param. |
| Arsenic, total (mg/L) | MW_1506 | 0.0009971 | 0.0004722 | 0.01 | No | 15 | 0 | No | 0.01 | Param. |
| Arsenic, total (mg/L) | MW_1507 | 0.002382 | 0.0006497 | 0.01 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Arsenic, total (mg/L) | MW_1509 | 0.00051 | 0.000346 | 0.01 | No | 15 | 0 | No | 0.01 | Param. |
| Arsenic, total (mg/L) | MW_1510 | 0.0005545 | 0.0003482 | 0.01 | No | 15 | 0 | No | 0.01 | Param. |
| Barium, total (mg/L) | MW_1505 | 0.0577 | 0.0459 | 2 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Barium, total (mg/L) | MW_1506 | 0.062 | 0.0527 | 2 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Barium, total (mg/L) | MW_1507 | 0.08132 | 0.05811 | 2 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Barium, total (mg/L) | MW_1509 | 0.06043 | 0.05038 | 2 | No | 15 | 0 | No | 0.01 | Param. |
| Barium, total (mg/L) | MW_1510 | 0.04532 | 0.03968 | 2 | No | 15 | 0 | No | 0.01 | Param. |
| Beryllium, total (mg/L) | MW_1505 | 0.00015 | 0.00001 | 0.004 | No | 15 | 46.67 | No | 0.01 | NP (normality) |
| Beryllium, total (mg/L) | MW_1506 | 0.0001 | 0.00001 | 0.004 | No | 15 | 33.33 | No | 0.01 | NP (normality) |
| Beryllium, total (mg/L) | MW_1507 | 0.0001307 | 0.00006062 | 0.004 | No | 15 | 33.33 | No | 0.01 | Param. |
| Beryllium, total (mg/L) | MW_1509 | 0.0001 | 0.00001 | 0.004 | No | 15 | 73.33 | No | 0.01 | NP (normality) |
| Beryllium, total (mg/L) | MW_1510 | 0.0001 | 0.00001 | 0.004 | No | 15 | 53.33 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW_1505 | 0.00005 | 0.00002 | 0.005 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW_1506 | 0.00003 | 0.00001 | 0.005 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW_1507 | 0.00007 | 0.00003 | 0.005 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW_1509 | 0.000025 | 0.00001 | 0.005 | No | 15 | 13.33 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW_1510 | 0.000025 | 0.000005 | 0.005 | No | 15 | 33.33 | No | 0.01 | NP (normality) |
| Chromium, total (mg/L) | MW_1505 | 0.004527 | 0.0007618 | 0.1 | No | 14 | 0 | ln(x) | 0.01 | Param. |
| Chromium, total (mg/L) | MW_1506 | 0.00256 | 0.00097 | 0.1 | No | 15 | 0 | ln(x) | 0.01 | Param. |
| Chromium, total (mg/L) | MW_1507 | 0.01285 | 0.003459 | 0.1 | No | 15 | 0 | No | 0.01 | Param. |
| Chromium, total (mg/L) | MW_1509 | 0.001602 | 0.000668 | 0.1 | No | 15 | 0 | ln(x) | 0.01 | Param. |
| Chromium, total (mg/L) | MW_1510 | 0.00228 | 0.0007276 | 0.1 | No | 14 | 0 | ln(x) | 0.01 | Param. |
| Cobalt, total (mg/L) | MW_1505 | 0.0008655 | 0.0001921 | 0.003 | No | 15 | 0 | x^(1/3) | 0.01 | Param. |
| Cobalt, total (mg/L) | MW_1506 | 0.0007849 | 0.0003244 | 0.003 | No | 15 | 0 | No | 0.01 | Param. |
| Cobalt, total (mg/L) | MW_1507 | 0.002391 | 0.0005695 | 0.003 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Cobalt, total (mg/L) | MW_1509 | 0.0003447 | 0.0001567 | 0.003 | No | 15 | 0 | No | 0.01 | Param. |
| Cobalt, total (mg/L) | MW_1510 | 0.0002558 | 0.000138 | 0.003 | No | 15 | 0 | No | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW_1505 | 0.9958 | 0.5509 | 5 | No | 15 | 0 | No | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW_1506 | 1.175 | 0.3661 | 5 | No | 15 | 0 | No | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW_1507 | 1.5 | 0.6779 | 5 | No | 14 | 0 | No | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW_1509 | 1.309 | 0.5448 | 5 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW_1510 | 0.9987 | 0.4276 | 5 | No | 14 | 0 | No | 0.01 | Param. |
| Fluoride, total (mg/L) | MW_1505 | 0.06 | 0.03 | 4 | No | 16 | 68.75 | No | 0.01 | NP (normality) |
| Fluoride, total (mg/L) | MW_1506 | 0.07 | 0.04 | 4 | No | 16 | 50 | No | 0.01 | NP (normality) |
| Fluoride, total (mg/L) | MW_1507 | 0.07 | 0.06 | 4 | No | 16 | 6.25 | No | 0.01 | NP (normality) |
| Fluoride, total (mg/L) | MW_1509 | 0.15 | 0.1 | 4 | No | 16 | 0 | No | 0.01 | NP (normality) |
| Fluoride, total (mg/L) | MW_1510 | 0.1 | 0.05 | 4 | No | 16 | 18.75 | No | 0.01 | NP (normality) |
| Lead, total (mg/L) | MW_1505 | 0.00102 | 0.000091 | 0.015 | No | 15 | 20 | No | 0.01 | NP (Cohens/xfrm) |
| Lead, total (mg/L) | MW_1506 | 0.0005977 | 0.0002256 | 0.015 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Lead, total (mg/L) | MW_1507 | 0.002285 | 0.0004213 | 0.015 | No | 15 | 6.667 | sqrt(x) | 0.01 | Param. |
| Lead, total (mg/L) | MW_1509 | 0.0001239 | 0.00003055 | 0.015 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Lead, total (mg/L) | MW_1510 | 0.0001785 | 0.00007751 | 0.015 | No | 15 | 0 | ln(x) | 0.01 | Param. |
| Lithium, total (mg/L) | MW_1505 | 0.01128 | 0.006223 | 0.021 | No | 15 | 6.667 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW_1506 | 0.01468 | 0.009161 | 0.021 | No | 15 | 6.667 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW_1507 | 0.01688 | 0.01014 | 0.021 | No | 15 | 6.667 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW_1509 | 0.01634 | 0.009168 | 0.021 | No | 15 | 6.667 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW_1510 | 0.01402 | 0.008135 | 0.021 | No | 15 | 0 | No | 0.01 | Param. |
| Mercury, total (mg/L) | MW_1505 | 0.000006 | 0.000002 | 0.002 | No | 15 | 73.33 | No | 0.01 | NP (normality) |
| Mercury, total (mg/L) | MW_1506 | 0.000005 | 0.000002 | 0.002 | No | 15 | 60 | No | 0.01 | NP (normality) |
| Mercury, total (mg/L) | MW_1507 | 0.00001 | 0.000003 | 0.002 | No | 15 | 20 | No | 0.01 | NP (Cohens/xfrm) |
| Mercury, total (mg/L) | MW_1509 | 0.000005 | 0.000002 | 0.002 | No | 15 | 86.67 | No | 0.01 | NP (NDs) |
| Mercury, total (mg/L) | MW_1510 | 0.000005 | 0.000002 | 0.002 | No | 15 | 93.33 | No | 0.01 | NP (NDs) |
| Molybdenum, total (mg/L) | MW_1505 | 0.002074 | 0.0009128 | 0.0018 | No | 14 | 21.43 | No | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW_1506 | 0.001235 | 0.0005945 | 0.0018 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW_1507 | 0.004103 | 0.0008945 | 0.0018 | No | 15 | 6.667 | sqrt(x) | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW_1509 | 0.002 | 0.00048 | 0.0018 | No | 15 | 26.67 | No | 0.01 | NP (Cohens/xfrm) |
| Molybdenum, total (mg/L) | MW_1510 | 0.002 | 0.00033 | 0.0018 | No | 14 | 35.71 | No | 0.01 | NP (normality) |
| Selenium, total (mg/L) | MW_1505 | 0.0006461 | 0.0002499 | 0.05 | No | 15 | 0 | No | 0.01 | Param. |
| Selenium, total (mg/L) | MW_1506 | 0.0001 | 0.00007 | 0.05 | No | 15 | 20 | No | 0.01 | NP (normality) |
| Selenium, total (mg/L) | MW_1507 | 0.0003551 | 0.0000984 | 0.05 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |

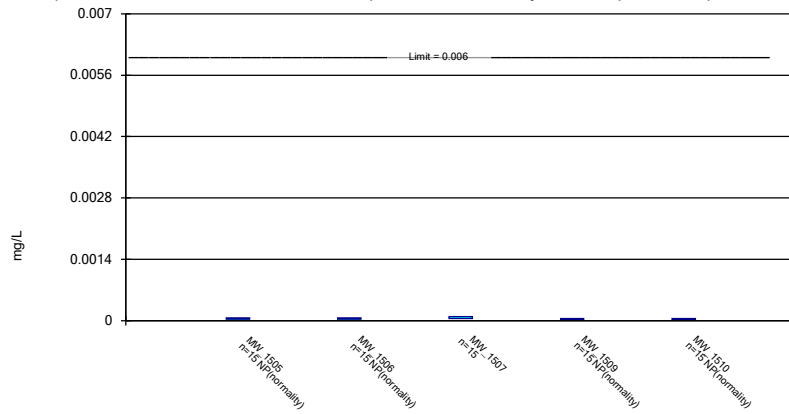
Confidence Interval - All Results (No Significant)

Mitchell BAP Client: Geosyntec Data: Mitchell BAP Printed 6/16/2020, 2:13 AM

| Constituent | Well | Upper Lim. | Lower Lim. | Compliance | Sig. | N | %NDs | Transform | Alpha | Method |
|------------------------|---------|------------|------------|------------|------|----|-------|-----------|-------|----------------|
| Selenium, total (mg/L) | MW_1509 | 0.0003 | 0.00009 | 0.05 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Selenium, total (mg/L) | MW_1510 | 0.0002 | 0.00008 | 0.05 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW_1505 | 0.0005 | 0.000067 | 0.002 | No | 15 | 33.33 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW_1506 | 0.0005 | 0.00005 | 0.002 | No | 15 | 33.33 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW_1507 | 0.0005 | 0.000051 | 0.002 | No | 15 | 33.33 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW_1509 | 0.0005 | 0.00003 | 0.002 | No | 15 | 33.33 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW_1510 | 0.0005 | 0.00001 | 0.002 | No | 15 | 40 | No | 0.01 | NP (normality) |

Parametric and Non-Parametric (NP) Confidence Interval

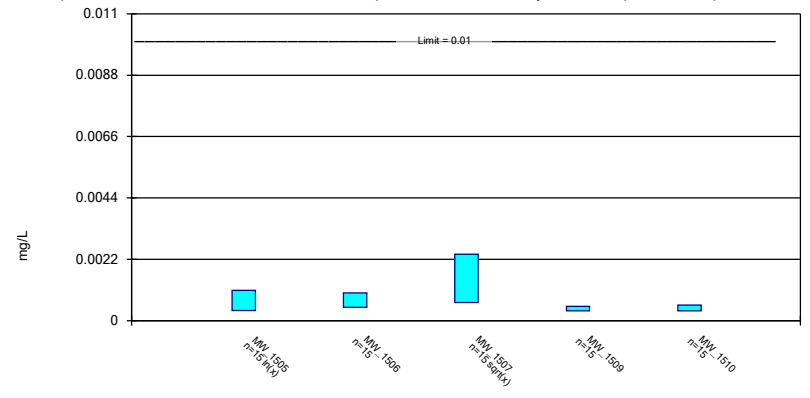
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Antimony, total Analysis Run 6/16/2020 2:10 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval

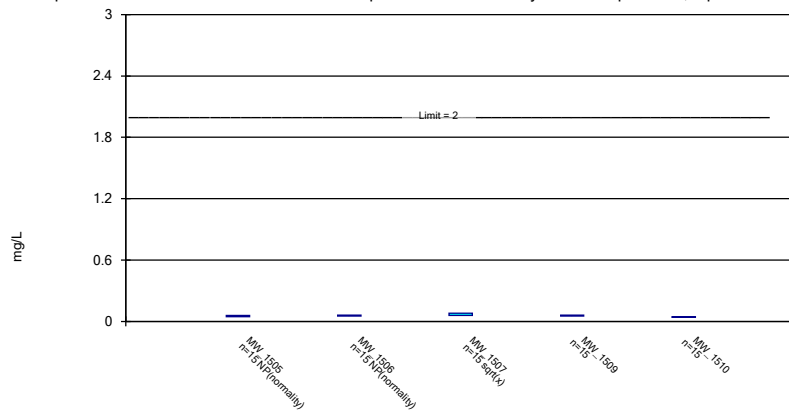
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Arsenic, total Analysis Run 6/16/2020 2:10 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval

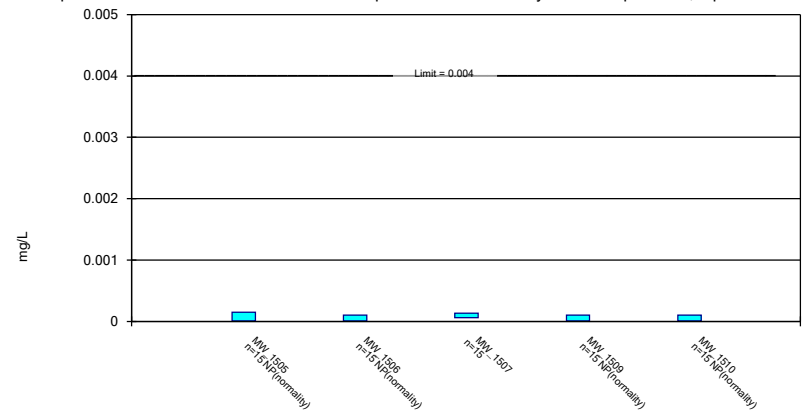
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Barium, total Analysis Run 6/16/2020 2:10 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval

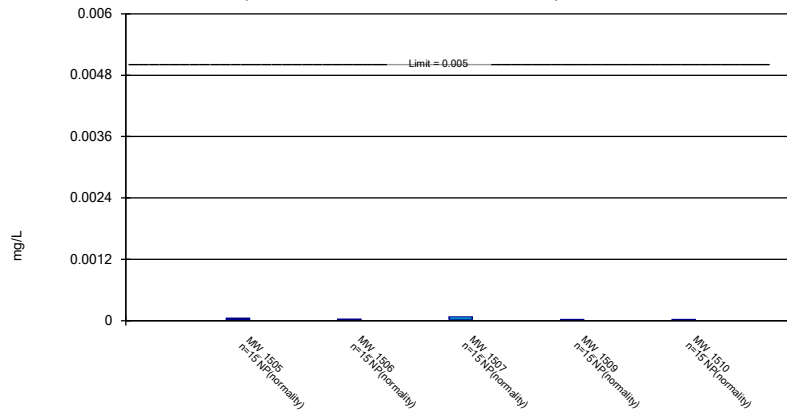
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Beryllium, total Analysis Run 6/16/2020 2:10 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Non-Parametric Confidence Interval

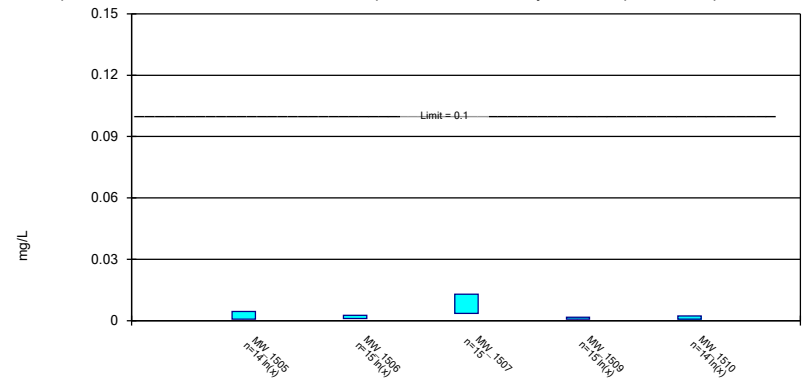
Compliance Limit is not exceeded. Per-well alpha = 0.01.



Constituent: Cadmium, total Analysis Run 6/16/2020 2:10 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval

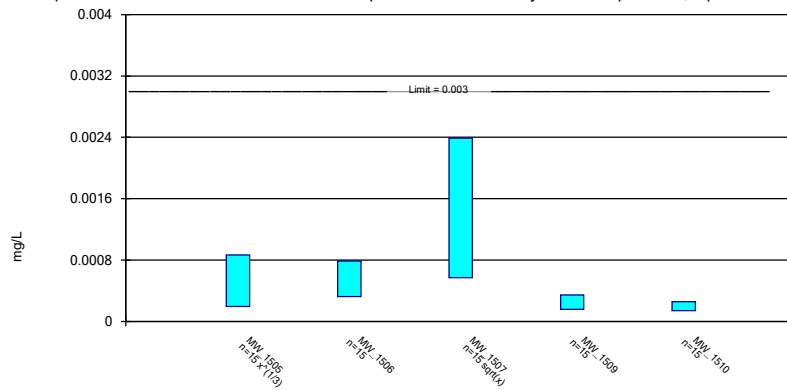
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Chromium, total Analysis Run 6/16/2020 2:10 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval

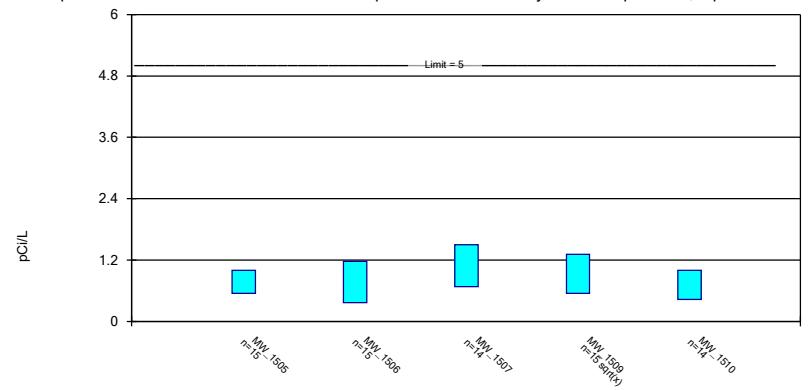
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Cobalt, total Analysis Run 6/16/2020 2:10 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval

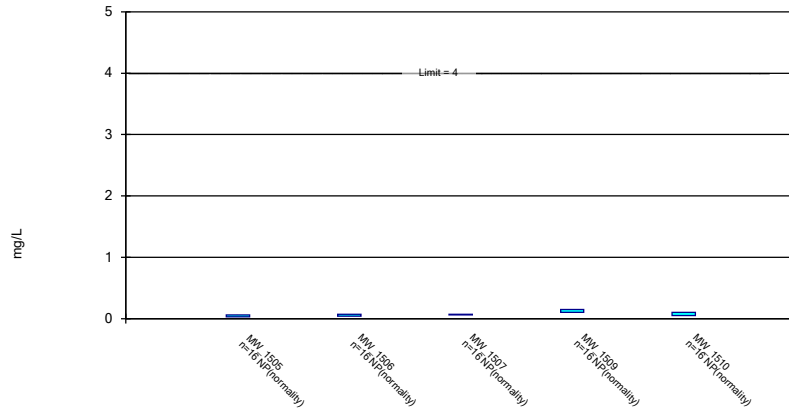
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Combined Radium 226 + 228 Analysis Run 6/16/2020 2:10 AM View: AIV
Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Non-Parametric Confidence Interval

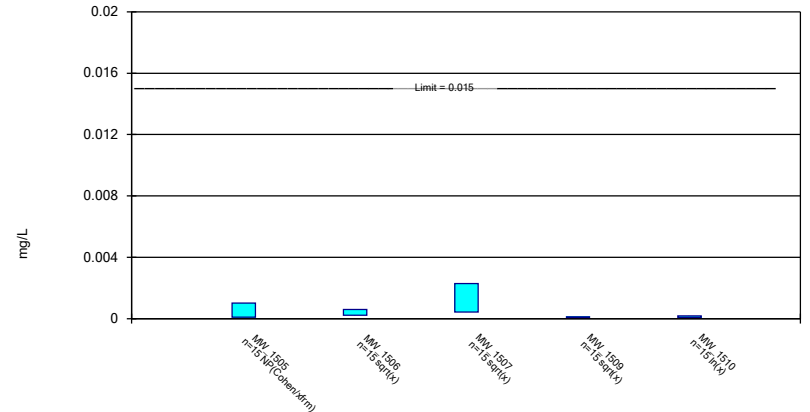
Compliance Limit is not exceeded. Per-well alpha = 0.01.



Constituent: Fluoride, total Analysis Run 6/16/2020 2:10 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval

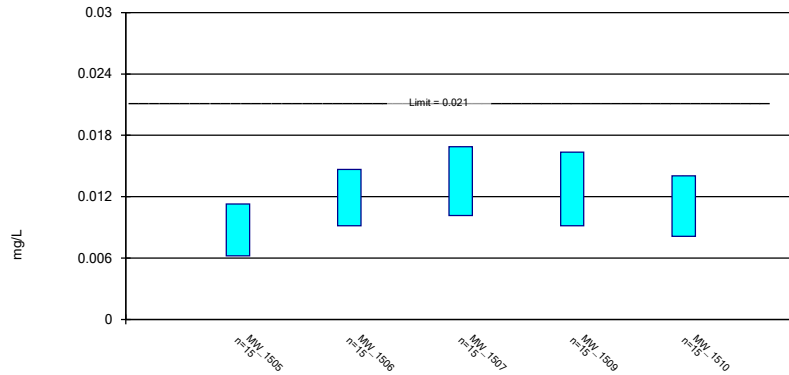
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Lead, total Analysis Run 6/16/2020 2:10 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric Confidence Interval

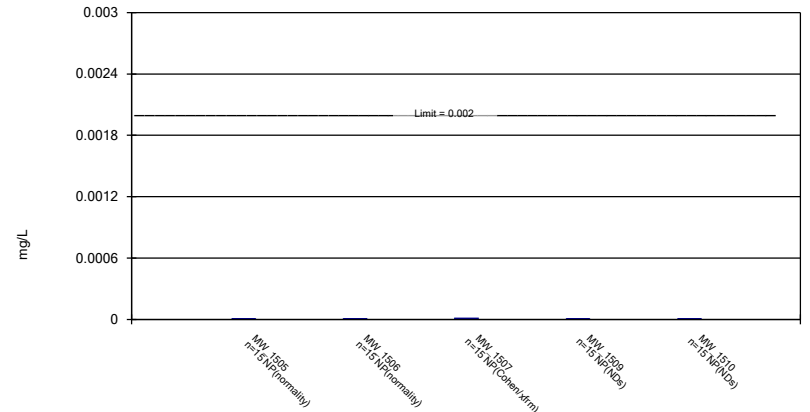
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Lithium, total Analysis Run 6/16/2020 2:10 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Non-Parametric Confidence Interval

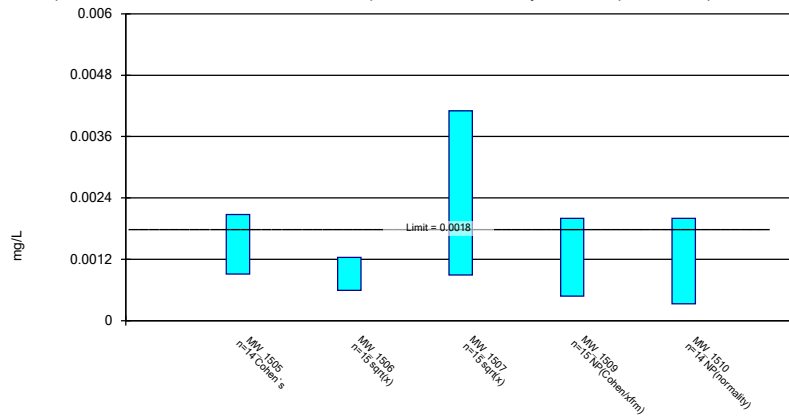
Compliance Limit is not exceeded. Per-well alpha = 0.01.



Constituent: Mercury, total Analysis Run 6/16/2020 2:10 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval

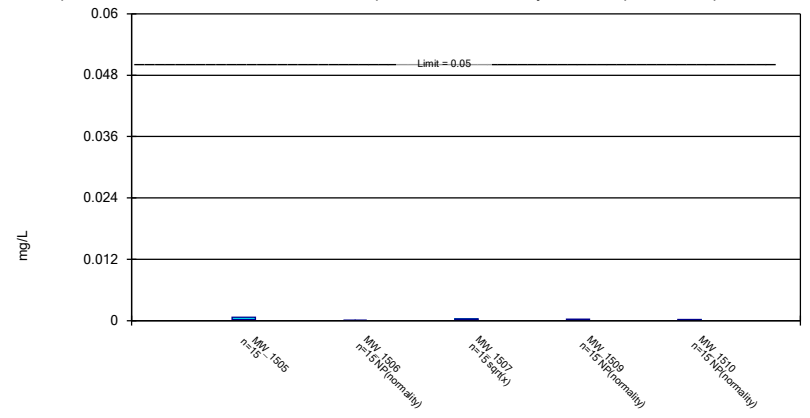
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Molybdenum, total Analysis Run 6/16/2020 2:11 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Parametric and Non-Parametric (NP) Confidence Interval

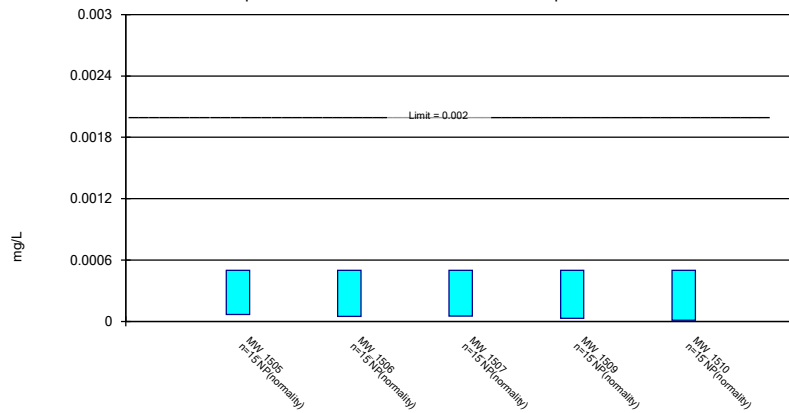
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Selenium, total Analysis Run 6/16/2020 2:11 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

Non-Parametric Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01.



Constituent: Thallium, total Analysis Run 6/16/2020 2:11 AM View: AIV
 Mitchell BAP Client: Geosyntec Data: Mitchell BAP

APPENDIX 3 – Alternative Source Demonstrations

Alternative source demonstrations relative to Appendix IV SSLs above the groundwater protection standard were not necessary because no SSLs above the groundwater protection standards were identified in 2020. Alternative source demonstrations are not applicable at this time.

APPENDIX 4 - Notices for Monitoring Program Transitions

No transition between monitoring requirements occurred in 2020; the CCR unit remained in assessment monitoring over the entire year. Notices for monitoring program transitions are not applicable at this time.

APPENDIX 5 - Well Installation/Decommissioning Logs

No monitoring wells installed or decommissioned in 2020. Well installation/decommissioning logs are not applicable at this time.