



American Electric Power
1 Riverside Plaza
Columbus, OH 43215
aep.com

March 18, 2021

Submitted Electronically via Email

Ms. Kirsten Hillyer, Environmental Engineer
U.S. Environmental Protection Agency
Office of Resource Conservation & Recovery (ORCR)
Materials Recovery & Waste Management Division (MRWMD)
Cube: S-6834
Washington, DC 20460

RE: Appalachian Power Company
Mountaineer Power Plant Alternative Closure Demonstration

Dear Ms. Hillyer,

Appalachian Power Company (APCO) Mountaineer Power Plant (Mountaineer Plant) hereby submits the attached information to the U.S. Environmental Protection Agency (EPA) in response to your email to me dated Friday, March 12, 2021, requesting additional information for Mountaineer Plant's Site Specific Alternative Deadline to Initiate Closure under 40 CFR 257.103(f)(1) for the Bottom Ash Pond (BAP) at the Mountaineer Plant near New Haven, West Virginia. Your email requested additional information to address the following:

- The groundwater quality data summary tables do not include data collected during 2020
- The groundwater quality data for MW-28 (a landfill well) were not included
- Drilling logs for MW-38 and MW-39 are not included; well construction details of MW-38 and MW-39 are included

The 2020 annual groundwater monitoring reports, which include historical data tables, including groundwater data collected in 2020, for Mountaineer Plant's BAP and Landfill are included in attachments A and B, respectively.

Mountaineer Landfill's certified groundwater monitoring network does not include MW-28. Therefore, MW-28 groundwater data is not available and not included in the submittal. The Mountaineer certified groundwater monitoring network includes the following wells:

- Upgradient: MW-30 and MW-1612
- Downgradient: MW-26, MW-27, MW-38, MW-39, and MW-1611

The data for all the above mentioned wells, that are included in the network, is included in attachment B, Mountaineer Landfill 2020 Annual Groundwater Monitoring Report.

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Mountaineer Landfill MW-38 and MW-39 boring logs and well construction forms are included in attachment C. Note that the boring number is not the monitoring well number. The boring number for MW-38 and MW-39 is B-0502. This single boring was used to install and construct both MW-38 and MW-39 due to their close proximity to each other. Note that Boring-0502 was also included in the original submittal for the BAP Alternative Closure Demonstration Request within the Landfill Groundwater Monitoring Network Evaluation report attachment.

In lieu of hard copies of these documents, electronic files are being submitted to you and Richard Huggins via email. If you have any questions regarding this submittal, please contact me at 614-716-2281 or damiller@aep.com.

Sincerely,



David A. Miller, P.E.
Director, Land Environment & Remediation Services
Environmental Services Division

Attachments

cc: Richard Huggins – USEPA

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EPA ADDITIONAL INFORMATION REQUEST

ATTACHMENT A

MOUNTAINEER PLANT BOTTOM ASH POND

2020 ANNUAL GROUNDWATER MONITORING REPORT

Annual Groundwater Monitoring Report

Appalachian Power Company
Mountaineer Plant
Bottom Ash Pond CCR Management Unit
Letart, WV

January 2021

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



An **AEP** Company

BOUNLESS ENERGYSM

| | <u>Table of Contents</u> | <u>Page</u> |
|-------|--|-------------|
| I. | Overview..... | 1 |
| II. | Groundwater Monitoring Well Locations and Identification Numbers | 4 |
| III. | Monitoring Wells Installed or Decommissioned | 5 |
| IV. | Groundwater Quality Data and Static Water Elevation Data and Flow Rate | 5 |
| V. | Groundwater Quality Data Statistical Analysis | 5 |
| VI. | Alternative Source Demonstrations | 5 |
| VII. | Discussion About Transition Between Monitoring Requirements or Alternate Monitoring Frequency..... | 5 |
| VIII. | Other Information Required..... | 6 |
| IX. | Description of Any Problems Encountered in 2020 and Actions Taken | 6 |
| X. | A Projection of Key Activities for the Upcoming Year..... | 6 |

Appendix 1 – GW Quality Data, GW Flow Directions, GW Flow Rates

Appendix 2 – GW Quality Data Statistical Analyses

Appendix 3 – Alternative Source Demonstrations – Not Applicable

Appendix 4 – Notices for Monitoring Program Transitions

Appendix 5 – Well Installation / Decommissioning Logs – Not Applicable

I. Overview

This *Annual Groundwater Monitoring and Corrective Action Report* (Report) has been prepared to report the status of activities for the preceding year for the bottom ash pond CCR unit at Appalachian Power Company's, a wholly-owned subsidiary of American Electric Power Company (AEP), Mountaineer Power Plant. The USEPA's CCR rules require that the Annual Groundwater Monitoring and Corrective Action Report be posted to the operating record for the preceding year no later than January 31.

In general, the following activities were completed:

- An assessment monitoring program for Mountaineer Bottom Ash Pond (MT BAP) was established on April 13, 2018.
- Statistically significant level of lithium concentrations above groundwater protection standards were observed on January 8, 2019. An Assessment of Corrective Measures (ACM) was initiated on March 26, 2019. The ACM was completed on June 24, 2019 and the public meeting to discuss the proposed remedies was held on August 22, 2019. The ACM was revised on November 30, 2020 per federal EPA comments received via conference call discussions.
- Two semi-annual progress reports on selecting a remedy pursuant to § 257.97 were completed on March 20, 2020 and September 20, 2020. A remedy has not yet been selected.
- Groundwater samples were collected in March, May, and October 2020 and analyzed for Appendix III and Appendix IV constituents, as specified in 40 CFR 257.95 *et seq.* and AEP's *Groundwater Sampling and Analysis Plan (2016)*.
- Analytical results for groundwater monitoring are included in **Appendix 1** along with groundwater flow rate and direction.
- Groundwater data underwent various validation tests, including tests for completeness, valid values, transcription errors, and consistent units.
- The May 2020 sampling event identified the following:
 - Lithium exceeded the groundwater protection standard (GWPS) at MW-1605D, MW-1605S, MW-1606D, MW-1606S, MW-1607D, and MW-1607S.
 - Statistically significant increase (SSI) for boron above the upper prediction limit was observed at MW-1604D, MW-1604S, MW-1604D, MW-1604S, MW-1605D, MW-1605S, MW-1606D, MW-1606S, MW-1607D, and MW-1607S
 - SSI for calcium above the upper prediction limit was observed at MW-1604D, MW-1604S, MW-1605D, MW-1606D, MW-1606S, and MW-1607D.

- SSI for chloride above the upper prediction limit was observed at MW-1604D, MW-1604S, MW-1605D, MW-1605S, MW-1606D, MW-1606S, MW-1607D, and MW-1607S.
 - SSI for Fluoride above the upper prediction limit was observed at MW-1605S, MW-1606S, and MW-1607D.
 - SSI for Sulfate above the upper prediction limit was observed at MW-1604S, MW-1605D, MW-1606D, and MW-1607D.
 - Statistically significant decrease (SSD) for pH below the lower prediction limit was observed at MW-1607S.
 - SSI for TDS above the upper prediction limit was observed at MW-1604D, MW-1604S, MW-1605D, MW-1605S, MW-1606D, MW-1606S, MW-1607D, and MW-1607S.
- The statistical analysis for the May 2020 assessment monitoring event was completed in October 2020 and is included in **Appendix 2**.
- Notification of a statistically significant level (SSL) of constituent above groundwater protection standard (GWPS) was completed for Lithium.
- The October 2020 data are still undergoing statistical analysis.

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.
- Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a statement as to why that happened.
- 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 significant increase over background concentrations (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). This is not applicable.
- A summary of any transition between monitoring programs or an alternate monitoring frequency, for example the date and circumstances for transitioning from detection

monitoring to assessment monitoring, in addition to identifying the constituents detected at a statistically significant increase over background concentrations (**Appendix 4**).

- Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a statement as to why that happened (Attached as Appendix 5, where applicable). This is not applicable.
- Other information required to be included in the annual report such as alternate source demonstration 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

The figure that follows depicts the PE-certified groundwater monitoring network, the monitoring well locations and their corresponding identification numbers. The total groundwater monitoring network includes 4 up-gradient wells and 8 down-gradient wells. The monitoring well distribution adequately cover down-gradient and up-gradient areas as detailed in the *Ground Water Monitoring Well Network Evaluation* report that was placed in the American Electric Power CCR public internet site on March 9, 2017. Additional wells are shown in the figure that were installed as part of the Nature and Extent Characterization study.

**Monitoring Well Network**

- ✿ Compliance Sampling Location
- ◆ Background Sampling Location
- ◆ Nature and Extent Wells

**Notes**

- Monitoring well coordinates provided by AEP.
- Site features based on information available in Ash Pond System-CCR Groundwater Monitoring Well Network Evaluation (Arcadis, 2016) provided by AEP.

1,000 500 0 1,000
1 Kilometer
1 Mile
1 Foot

Site Layout

CCR Bottom Ash Ponds
AEP Mountaineer Generating Plant
Letart, West Virginia

Geosyntec
consultants

Figure

1

Columbus, Ohio

2020/01/24

III. Monitoring Wells Installed or Decommissioned

No monitoring wells were installed or decommissioned in 2020.

IV. Groundwater Quality Data and Static Water Elevation Data and Flow Rate

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 velocity calculations, groundwater flow direction and potentiometric maps developed after each sampling event. It is important to note that MW-1928 although installed, was unable to be sampled due to very low groundwater yield the first attempt and the monitoring well being dry and not recovering on the following attempts.

V. Groundwater Quality Data Statistical Analysis

Statistical analysis of the May 2020 257.95(d)(1) (assessment monitoring of all Appendix III and detected Appendix IV parameters) resulted in a SSL above the GWPS for lithium on October 2, 2020. A notice of this SSL was placed in the facility electronic operating record and on the publicly available internet site. The full statistical analysis report for this event is included in **Appendix 2**.

The October 2020 257.95(d)(1) sampling and analysis was completed. The statistical analysis for this data is ongoing and will be completed in early 2021

The notice of statistically significant levels above the groundwater protection standard that were completed in 2020 can be found in **Appendix 4** and on the publicly available internet site at <https://www.aep.com/environment/ccr>.

VI. Alternative Source Demonstrations

No alternative source demonstrations were completed related to the assessment monitoring sampling events and statistical analysis.

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

The Mountaineer Bottom Ash Pond CCR Unit transitioned from the Assessment Monitoring program to the Assessment of Corrective Measures program on March 26, 2019 due to the SSL above a GWPS on January 8, 2019. An Assessment of Corrective Measures Report was completed on June 24, 2019. A public meeting was held on August 22, 2019 to present the

assessment of corrective measure options. At this time, the selection of remedy is on-going. Two semi-annual reports describing the progress in selecting and designing the remedy were completed in March and September 2020. Semi-annual assessment monitoring sampling and analysis will continue during the assessment of corrective measures and selection of remedy. The notice for initiating assessment of corrective measures can be found in **Appendix 4** of this report and on the publicly available internet site at <https://www.aep.com/environment/ccr>.

Regarding defining an alternate monitoring frequency, the groundwater velocity and monitoring well production is high enough at this facility that no modification to the monitoring frequency is needed.

VIII. Other Information Required

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. The low flow sampling effort went smoothly 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:

- Assessment monitoring on a twice per year schedule;
- Continue evaluation of the selection of remedy;
- Prepare a selection of remedy semi-annual progress report;
- Responding to any new data received in light of what the CCR rule requires; and
- Preparation of the next annual groundwater report.

APPENDIX 1

Tables follow that show the groundwater monitoring data collected and rate and direction of groundwater flow. The dates that the samples were collected are also shown.

Table 1 - Groundwater Data Summary: MW-107
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 6/18/2018 | Assessment | -- | -- | -- | -- | 6.8 | -- | -- |
| 4/10/2019 | Assessment | 0.614 | 270 | 71.4 | 0.21 | 6.8 | 518 | 1,270 |
| 6/18/2019 | Assessment | 0.592 | 245 | 71.7 | 0.22 | -- | 545 | 1,250 |
| 9/10/2019 | Assessment | 0.696 | 316 | 79.7 | 0.19 | 7.1 | 631 | 1,410 |
| 3/10/2020 | Assessment | -- | -- | -- | 0.25 | -- | -- | -- |
| 5/13/2020 | Assessment | 0.579 | 239 | 66.5 | 0.26 | 6.7 | 555 | 1,240 |
| 10/6/2020 | Assessment | 0.560 | 179 | 46.1 | 0.25 | 6.6 | 301 | 845 |

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-107
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 4/10/2019 | Assessment | < 0.1 U | 1.08 | 68.3 | < 0.1 U | 0.05 J | 0.4 J | 1.03 | 1.854 | 0.21 | 0.4 J | 0.02 J | < 0.002 U | < 2 U | 0.7 J | < 0.5 U |
| 6/18/2019 | Assessment | 0.03 J | 0.44 | 69.4 | < 0.02 U | 0.05 | 0.08 J | 1.45 | 0.2284 | 0.22 | 0.04 J | < 0.009 U | < 0.002 U | < 0.4 U | 0.6 | < 0.1 U |
| 9/10/2019 | Assessment | 0.02 J | 0.44 | 67.8 | < 0.02 U | 0.04 J | 0.07 J | 1.08 | 3.5 | 0.19 | < 0.05 U | 0.00358 | < 0.002 U | < 0.4 U | 0.8 | < 0.1 U |
| 3/10/2020 | Assessment | < 0.02 U | 0.42 | 48.2 | < 0.02 U | 0.03 J | 0.1 J | 0.741 | 0.161 | 0.25 | < 0.05 U | 0.00410 | < 0.002 U | < 0.4 U | 0.7 | < 0.1 U |
| 5/13/2020 | Assessment | 0.03 J | 0.59 | 48.1 | -- | 0.07 | 0.2 J | 1.90 | 0.524 | 0.26 | < 0.05 U | 0.00336 | -- | 0.7 J | 0.5 | < 0.1 U |
| 10/6/2020 | Assessment | < 0.02 U | 0.34 | 35.4 | -- | 0.02 J | 0.548 | 0.219 | 1.111 | 0.25 | < 0.05 U | 0.00308 | < 0.002 U | < 0.4 U | 1.0 | < 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-112
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 6/19/2019 | Assessment | 0.283 | 142 | 37.2 | 0.24 | 7.2 | 255 | 668 |
| 5/13/2020 | Assessment | 0.246 | 108 | 33.3 | 0.29 | 6.8 | 205 | 533 |

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-112
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 6/19/2019 | Assessment | < 0.02 U | 0.40 | 76.9 | < 0.02 U | < 0.01 U | 0.2 J | 0.02 J | 0.0507 | 0.24 | 0.02 J | < 0.009 U | < 0.002 U | 11.2 | 1.5 | < 0.1 U |
| 5/13/2020 | Assessment | < 0.02 U | 0.33 | 59.7 | -- | < 0.01 U | 0.236 | 0.02 J | 0.08899 | 0.29 | < 0.05 U | 0.00151 | -- | 5.62 | 0.9 | < 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-203
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 6/18/2019 | Assessment | 0.1 J | 115 | 31.4 | 0.22 | 7.2 | 86.8 | 472 |
| 9/11/2019 | Assessment | 0.104 | 106 | 10.1 | 0.22 | 7.1 | 65.5 | 435 |
| 3/11/2020 | Assessment | -- | -- | -- | 0.25 | 7.0 | -- | -- |
| 5/13/2020 | Assessment | 0.094 | 103 | 12.6 | 0.28 | 7.0 | 77.1 | 434 |
| 10/6/2020 | Assessment | 0.085 | 92.3 | 12.5 | 0.32 | 6.8 | 60.0 | 423 |

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-203
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 6/18/2019 | Assessment | < 0.02 U | 0.30 | 34.7 | < 0.02 U | < 0.01 U | 0.2 J | 0.054 | 0.1139 | 0.22 | 0.113 | < 0.009 U | < 0.002 U | 2 J | 1.4 | < 0.1 U |
| 9/11/2019 | Assessment | 0.02 J | 0.33 | 31.6 | < 0.02 U | < 0.01 U | 0.2 J | 0.139 | 0.381 | 0.22 | 0.2 J | 0.00230 | < 0.002 U | 1 J | 1.1 | < 0.1 U |
| 3/11/2020 | Assessment | < 0.02 U | 0.25 | 33.4 | < 0.02 U | < 0.01 U | 0.217 | 0.05 J | 0.824 | 0.25 | 0.1 J | 0.00237 | < 0.002 U | 1 J | 1.4 | < 0.1 U |
| 5/13/2020 | Assessment | < 0.02 U | 0.29 | 31.0 | -- | < 0.01 U | 0.204 | 0.03 J | 0.4071 | 0.28 | < 0.05 U | 0.00227 | -- | 1 J | 1.1 | < 0.1 U |
| 10/6/2020 | Assessment | 0.03 J | 0.28 | 24.6 | -- | < 0.01 U | 0.360 | 0.107 | 1.568 | 0.32 | 0.226 | 0.00205 | < 0.002 U | 0.9 J | 0.8 | < 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-1601A
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/28/2016 | Background | 0.211 | 141 | 21.8 | 0.17 | 7.6 | 130 | 538 |
| 11/1/2016 | Background | 0.170 | 122 | 17.3 | 0.19 | 7.2 | 136 | 534 |
| 12/19/2016 | Background | 0.196 | 130 | 20.4 | 0.18 | 7.2 | 141 | 544 |
| 2/20/2017 | Background | 0.253 | 117 | 31.0 | 0.20 | 7.2 | 135 | 568 |
| 3/27/2017 | Background | 0.515 | 119 | 42.1 | 0.19 | 7.1 | 148 | 530 |
| 4/18/2017 | Background | 0.259 | 130 | 55.3 | 0.19 | 7.1 | 169 | 580 |
| 5/15/2017 | Background | 0.224 | 159 | 74.4 | 0.18 | 7.7 | 197 | 676 |
| 6/12/2017 | Background | 0.285 | 138 | 57.7 | 0.18 | 6.9 | 170 | 586 |
| 10/31/2017 | Detection | 0.224 | 137 | 49.4 | 0.19 | 7.1 | 169 | 564 |
| 5/10/2018 | Assessment | -- | -- | -- | 0.16 | 7.3 | -- | -- |
| 9/20/2018 | Assessment | 0.251 | 148 | 51.0 | 0.19 | 7.1 | 189 | 638 |
| 4/9/2019 | Assessment | 0.224 | 155 | 44.4 | 0.1 J | 7.1 | 176 | 692 |
| 6/20/2019 | Assessment | 0.160 | 165 | 48.6 | 0.16 | 7.3 | 207 | 730 |
| 9/11/2019 | Assessment | 0.153 | 164 | 45.8 | 0.14 | 7.0 | 221 | 749 |
| 3/12/2020 | Assessment | -- | -- | -- | 0.14 | 6.7 | -- | -- |
| 5/15/2020 | Assessment | 0.136 | 185 | 22.7 | 0.16 | 6.7 | 274 | 814 |
| 10/8/2020 | Assessment | 0.114 | 178 | 18.4 | 0.13 | 6.8 | 252 | 748 |

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-1601A
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/28/2016 | Background | 0.05 | 0.62 | 46.6 | < 0.005 U | 0.01 J | 0.3 | 0.116 | 0.43758 | 0.17 | 0.132 | 0.002 | < 0.002 U | 2.61 | 1.3 | 0.053 |
| 11/1/2016 | Background | 0.05 J | 0.61 | 45.2 | < 0.005 U | 0.02 J | 1.3 | 0.086 | 2.011 | 0.19 | 0.108 | 0.001 | < 0.002 U | 2.36 | 1.1 | 0.058 |
| 12/19/2016 | Background | 0.05 J | 0.65 | 47.0 | < 0.005 U | 0.02 J | 0.806 | 0.282 | 1.544 | 0.18 | 0.383 | < 0.0002 U | < 0.002 U | 0.93 | 1.1 | 0.04 J |
| 2/20/2017 | Background | 0.03 J | 0.55 | 41.4 | < 0.005 U | 0.02 J | 0.198 | 0.132 | 0.313 | 0.20 | 0.139 | 0.005 | < 0.002 U | 1.42 | 1.4 | 0.070 |
| 3/27/2017 | Background | 0.03 J | 0.49 | 40.2 | < 0.005 U | 0.01 J | 0.225 | 0.097 | 0.495 | 0.19 | 0.069 | 0.006 | < 0.002 U | 2.85 | 1.0 | 0.03 J |
| 4/18/2017 | Background | 0.03 J | 0.59 | 47.5 | < 0.004 U | 0.01 J | 0.170 | 0.093 | 0.814 | 0.19 | 0.052 | 0.007 | 0.003 J | 1.53 | 1.5 | 0.04 J |
| 5/15/2017 | Background | 0.04 J | 0.79 | 56.9 | < 0.004 U | 0.02 J | 0.166 | 0.154 | 1.279 | 0.18 | 0.141 | < 0.0002 U | < 0.002 U | 2.04 | 1.3 | 0.04 J |
| 6/12/2017 | Background | 0.04 J | 0.61 | 49.0 | < 0.004 U | 0.02 J | 0.152 | 0.098 | 0.599 | 0.18 | 0.063 | 0.004 | < 0.002 U | 1.13 | 1.5 | 0.04 J |
| 5/10/2018 | Assessment | 0.03 J | 0.55 | 63.9 | < 0.004 U | 0.02 J | 0.153 | 0.083 | 0.767 | 0.16 | 0.034 | 0.004 | < 0.002 U | 0.99 | 1.5 | 0.03 J |
| 9/20/2018 | Assessment | 0.03 J | 0.58 | 55.3 | < 0.004 U | 0.02 J | 0.131 | 0.059 | 0.696 | 0.19 | 0.005 J | 0.004 | < 0.002 U | 0.76 | 1.1 | 0.04 J |
| 4/9/2019 | Assessment | < 0.1 U | 0.61 | 52.0 | < 0.1 U | < 0.05 U | 0.2 J | 0.2 J | 1.168 | 0.1 J | < 0.1 U | 0.02 J | < 0.002 U | < 2 U | 1.1 | < 0.5 U |
| 6/20/2019 | Assessment | 0.03 J | 0.63 | 63.1 | < 0.02 U | 0.02 J | 0.314 | 0.03 J | 0.45 | 0.16 | 0.07 J | < 0.009 U | < 0.002 U | 0.9 J | 1.3 | < 0.1 U |
| 9/11/2019 | Assessment | 0.03 J | 0.62 | 65.3 | < 0.02 U | 0.02 J | 0.370 | 0.03 J | 1.168 | 0.14 | < 0.05 U | 0.00184 | < 0.002 U | 0.9 J | 1.1 | < 0.1 U |
| 3/12/2020 | Assessment | < 0.02 U | 0.58 | 64.9 | < 0.02 U | 0.01 J | 0.205 | 0.02 J | 1.685 | 0.14 | < 0.05 U | 0.00183 | < 0.002 U | 1 J | 1.4 | < 0.1 U |
| 5/15/2020 | Assessment | 0.03 J | 0.57 | 67.8 | -- | 0.02 J | 0.1 J | < 0.02 U | 0.553 | 0.16 | < 0.05 U | 0.00190 | -- | 0.7 J | 0.9 | < 0.1 U |
| 10/8/2020 | Assessment | 0.03 J | 0.59 | 61.0 | -- | 0.02 J | 0.328 | 0.04 J | 0.0868 | 0.13 | < 0.05 U | 0.00168 | < 0.002 U | 0.7 J | 0.9 | < 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-1602
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/28/2016 | Background | 0.141 | 74.9 | 7.95 | 0.17 | 7.3 | 167 | 412 |
| 11/1/2016 | Background | 0.115 | 71.1 | 8.70 | 0.18 | 6.6 | 178 | 424 |
| 12/19/2016 | Background | 0.120 | 74.7 | 9.91 | 0.18 | 6.9 | 188 | 470 |
| 2/20/2017 | Background | 0.093 | 69.6 | 9.76 | 0.19 | 6.5 | 193 | 494 |
| 3/27/2017 | Background | 0.240 | 86.6 | 12.0 | 0.19 | 6.3 | 231 | 504 |
| 4/17/2017 | Background | 0.107 | 91.1 | 12.1 | 0.20 | 6.7 | 248 | 520 |
| 5/15/2017 | Background | 0.115 | 105 | 12.6 | 0.19 | 7.0 | 273 | 598 |
| 6/12/2017 | Background | 0.153 | 94.0 | 11.8 | 0.20 | 6.8 | 269 | 588 |
| 10/31/2017 | Detection | 0.093 | 78.1 | 8.41 | 0.23 | 6.7 | 184 | 468 |
| 5/10/2018 | Assessment | -- | -- | -- | 0.23 | 7.0 | -- | -- |
| 9/20/2018 | Assessment | 0.109 | 81.6 | 10.5 | 0.25 | 7.1 | 195 | 502 |
| 4/9/2019 | Assessment | 0.09 J | 99.8 | 11.4 | 0.20 | 6.6 | 221 | 595 |
| 6/20/2019 | Assessment | 0.1 J | 91.2 | 10.7 | 0.23 | 7.0 | 267 | 606 |
| 9/11/2019 | Assessment | 0.111 | 95.1 | 10.4 | 0.21 | 6.7 | 259 | 603 |
| 3/11/2020 | Assessment | -- | -- | -- | 0.23 | 6.4 | -- | -- |
| 5/15/2020 | Assessment | 0.118 | 99.2 | 9.67 | 0.25 | 6.4 | 264 | 595 |
| 10/8/2020 | Assessment | 0.108 | 96.7 | 8.61 | 0.23 | 6.5 | 253 | 575 |

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-1602
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/28/2016 | Background | 0.02 J | 0.40 | 27.1 | < 0.005 U | 0.02 J | 0.2 | 0.217 | 0.275 | 0.17 | 0.255 | 0.013 | < 0.002 U | 0.90 | 0.08 J | 0.092 |
| 11/1/2016 | Background | 0.02 J | 0.35 | 28.7 | < 0.005 U | 0.02 J | 0.6 | 0.108 | 2.086 | 0.18 | 0.070 | 0.014 | < 0.002 U | 1.48 | 0.1 | 0.116 |
| 12/19/2016 | Background | 0.02 J | 0.43 | 28.9 | < 0.005 U | 0.01 J | 1.65 | 0.225 | 0.7053 | 0.18 | 0.272 | 0.008 | < 0.002 U | 0.56 | 0.08 J | 0.02 J |
| 2/20/2017 | Background | < 0.01 U | 0.35 | 26.9 | < 0.005 U | 0.01 J | 0.194 | 0.052 | 0.75 | 0.19 | 0.052 | 0.013 | < 0.002 U | 0.63 | 0.1 | 0.02 J |
| 3/27/2017 | Background | 0.01 J | 0.34 | 29.9 | < 0.005 U | 0.02 J | 0.456 | 0.059 | 0.679 | 0.19 | 0.063 | 0.019 | < 0.002 U | 1.49 | 0.2 | 0.01 J |
| 4/17/2017 | Background | 0.02 J | 0.36 | 32.1 | < 0.004 U | 0.01 J | 0.240 | 0.049 | 0.337 | 0.20 | 0.087 | 0.017 | 0.002 J | 0.66 | 0.1 | 0.01 J |
| 5/15/2017 | Background | 0.02 J | 0.42 | 33.2 | < 0.004 U | 0.02 J | 0.136 | 0.072 | 1.9116 | 0.19 | 0.078 | 0.009 | < 0.002 U | 1.28 | 0.1 | 0.04 J |
| 6/12/2017 | Background | 0.03 J | 0.36 | 33.1 | < 0.004 U | 0.01 J | 0.408 | 0.066 | 0.2898 | 0.20 | 0.061 | 0.018 | < 0.002 U | 0.53 | 0.1 | 0.02 J |
| 5/10/2018 | Assessment | 0.02 J | 0.34 | 31.2 | 0.005 J | 0.01 J | 0.121 | 0.036 | 0.342 | 0.23 | 0.038 | 0.015 | < 0.002 U | 0.71 | 0.1 | 0.03 J |
| 9/20/2018 | Assessment | 0.01 J | 0.32 | 26.7 | < 0.004 U | 0.01 J | 0.210 | 0.02 J | 0.683 | 0.25 | 0.01 J | 0.012 | < 0.002 U | 0.84 | 0.07 J | 0.02 J |
| 4/9/2019 | Assessment | < 0.1 U | 0.4 J | 29.0 | < 0.1 U | < 0.05 U | < 0.2 U | < 0.1 U | 1.0509 | 0.20 | < 0.1 U | 0.02 J | < 0.002 U | 3 J | 0.2 J | < 0.5 U |
| 6/20/2019 | Assessment | 0.02 J | 0.33 | 29.5 | < 0.02 U | 0.01 J | 0.2 J | 0.03 J | 0.1531 | 0.23 | 0.07 J | 0.01 J | < 0.002 U | 0.9 J | 0.1 J | < 0.1 U |
| 9/11/2019 | Assessment | < 0.02 U | 0.31 | 27.3 | < 0.02 U | 0.01 J | 0.2 J | < 0.02 U | 0.451 | 0.21 | < 0.05 U | 0.00979 | < 0.002 U | 1 J | 0.1 J | < 0.1 U |
| 3/11/2020 | Assessment | < 0.02 U | 0.31 | 28.9 | < 0.02 U | < 0.01 U | 0.261 | < 0.02 U | 0.4389 | 0.23 | 0.05 J | 0.0117 | < 0.002 U | 1 J | 0.2 J | < 0.1 U |
| 5/15/2020 | Assessment | 0.02 J | 0.31 | 30.0 | -- | 0.01 J | 0.2 J | 0.04 J | 0.5819 | 0.25 | < 0.05 U | 0.0126 | -- | 0.9 J | 0.09 J | < 0.1 U |
| 10/8/2020 | Assessment | 0.04 J | 0.33 | 25.7 | -- | 0.01 J | 0.311 | 0.04 J | 0.194 | 0.23 | < 0.05 U | 0.0104 | < 0.002 U | 0.9 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-1603
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/28/2016 | Background | 0.327 | 124 | 15.7 | 0.07 J | 7.3 | 388 | 618 |
| 11/2/2016 | Background | 0.334 | 146 | 22.8 | 0.08 J | 6.6 | 483 | 814 |
| 12/19/2016 | Background | 0.495 | 164 | 30.1 | 0.1 J | 7.4 | 504 | 908 |
| 2/20/2017 | Background | 0.543 | 169 | 27.4 | 0.1 J | 6.8 | 485 | 962 |
| 3/28/2017 | Background | 0.781 | 181 | 25.2 | 0.1 J | 6.6 | 476 | 918 |
| 4/17/2017 | Background | 0.519 | 170 | 22.9 | 0.1 J | 6.9 | 474 | 910 |
| 5/15/2017 | Background | 0.546 | 187 | 24.7 | 0.1 J | 7.4 | 470 | 910 |
| 6/12/2017 | Background | 0.535 | 176 | 20.5 | 0.1 J | 7.0 | 482 | 878 |
| 10/31/2017 | Detection | 0.360 | 171 | 13.1 | 0.1 J | 6.6 | 553 | 872 |
| 5/10/2018 | Assessment | -- | -- | -- | 0.09 J | 6.6 | -- | -- |
| 9/20/2018 | Assessment | 0.324 | 167 | 14.0 | 0.09 | 6.6 | 524 | 920 |
| 4/9/2019 | Assessment | 0.408 | 182 | 15.8 | 0.11 | 6.8 | 429 | 918 |
| 6/20/2019 | Assessment | 0.299 | 162 | 10.9 | 0.09 | 7.0 | 434 | 878 |
| 9/11/2019 | Assessment | 0.308 | 156 | 10.0 | 0.09 | 6.7 | 421 | 853 |
| 3/11/2020 | Assessment | -- | -- | -- | 0.06 | 6.4 | -- | -- |
| 5/15/2020 | Assessment | 0.275 | 161 | 10.7 | 0.09 | 6.5 | 387 | 809 |
| 10/8/2020 | Assessment | 0.221 | 139 | 8.86 | 0.07 | 6.3 | 332 | 692 |

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-1603
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/28/2016 | Background | 0.02 J | 0.36 | 29.5 | < 0.005 U | 0.02 J | 0.3 | 0.317 | 0.0927 | 0.07 J | 0.253 | 0.021 | < 0.002 U | 1.21 | 0.1 | 0.02 J |
| 11/2/2016 | Background | 0.02 J | 0.36 | 34.1 | < 0.005 U | 0.01 J | 0.4 | 0.166 | 2.593 | 0.08 J | 0.131 | 0.022 | < 0.002 U | 2.47 | 0.4 | 0.04 J |
| 12/19/2016 | Background | 0.03 J | 0.40 | 33.1 | < 0.005 U | 0.01 J | 2.37 | 0.134 | 0.966 | 0.1 J | 0.084 | 0.010 | < 0.002 U | 0.36 | 0.3 | 0.063 |
| 2/20/2017 | Background | 0.01 J | 0.37 | 31.7 | < 0.005 U | 0.01 J | 0.229 | 0.105 | 0.384 | 0.1 J | 0.077 | 0.012 | < 0.002 U | 0.37 | 0.4 | 0.02 J |
| 3/28/2017 | Background | 0.02 J | 0.36 | 32.9 | < 0.005 U | 0.01 J | 0.545 | 0.093 | 0.2071 | 0.1 J | 0.080 | 0.020 | < 0.002 U | 0.72 | 0.2 | < 0.01 U |
| 4/17/2017 | Background | 0.03 J | 0.52 | 33.7 | 0.005 J | 0.01 J | 0.304 | 0.377 | 0.6154 | 0.1 J | 0.308 | 0.018 | 0.003 J | 0.27 | 0.2 | 0.01 J |
| 5/15/2017 | Background | 0.03 J | 0.43 | 33.0 | < 0.004 U | 0.01 J | 0.415 | 0.101 | 1.6052 | 0.1 J | 0.079 | 0.012 | < 0.002 U | 0.71 | 0.1 | 0.02 J |
| 6/12/2017 | Background | 0.03 J | 0.35 | 32.0 | < 0.004 U | 0.01 J | 0.963 | 0.085 | 0.776 | 0.1 J | 0.059 | 0.021 | < 0.002 U | 0.29 | 0.1 | 0.01 J |
| 5/10/2018 | Assessment | 0.02 J | 0.31 | 41.3 | 0.007 J | 0.01 J | 0.099 | 0.054 | 0.363 | 0.09 J | 0.042 | 0.021 | < 0.002 U | 0.14 | 0.2 | 0.02 J |
| 9/20/2018 | Assessment | 0.02 J | 0.26 | 35.9 | < 0.004 U | 0.01 J | 0.102 | 0.032 | 0.881 | 0.09 | 0.02 J | 0.022 | < 0.002 U | 0.07 J | 0.4 | 0.01 J |
| 4/9/2019 | Assessment | < 0.1 U | 0.56 | 32.4 | < 0.1 U | < 0.05 U | 0.4 J | 0.622 | 2.389 | 0.11 | 0.5 J | 0.030 | < 0.002 U | < 2 U | 0.4 J | < 0.5 U |
| 6/20/2019 | Assessment | 0.03 J | 0.41 | 30.7 | < 0.02 U | 0.01 J | 0.249 | 0.204 | 0.2974 | 0.09 | 0.176 | < 0.009 U | < 0.002 U | 0.9 J | 0.3 | < 0.1 U |
| 9/11/2019 | Assessment | 0.03 J | 0.35 | 30.9 | < 0.02 U | 0.01 J | 0.205 | 0.112 | 1.07 | 0.09 | 0.1 J | 0.0150 | < 0.002 U | 0.5 J | 0.2 | < 0.1 U |
| 3/11/2020 | Assessment | < 0.02 U | 0.29 | 30.4 | < 0.02 U | 0.01 J | 0.224 | 0.061 | 2.036 | 0.06 | 0.08 J | 0.0175 | < 0.002 U | < 0.4 U | 0.2 J | < 0.1 U |
| 5/15/2020 | Assessment | < 0.02 U | 0.27 | 30.0 | -- | 0.01 J | 0.210 | 0.094 | 0.701 | 0.09 | 0.07 J | 0.0182 | -- | < 0.4 U | 0.2 J | < 0.1 U |
| 10/8/2020 | Assessment | 0.15 | 0.41 | 26.8 | -- | 0.01 J | 0.552 | 0.392 | 0.0948 | 0.07 | 0.310 | 0.0142 | < 0.002 U | < 0.4 U | 0.2 | < 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-1604D
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/26/2016 | Background | 3.54 | 306 | 111 | 0.18 | 7.3 | 865 | 1,650 |
| 11/1/2016 | Background | 2.98 | 277 | 116 | 0.19 | 7.3 | 866 | 1,580 |
| 12/20/2016 | Background | 3.07 | 289 | 118 | 0.17 | 7.4 | 863 | 1,630 |
| 2/21/2017 | Background | 3.01 | 260 | 111 | 0.21 | 7.2 | 823 | 1,640 |
| 3/28/2017 | Background | 4.18 | 293 | 112 | 0.19 | 7.2 | 814 | 1,660 |
| 4/19/2017 | Background | 2.97 | 269 | 109 | 0.20 | 7.2 | 797 | 1,570 |
| 5/16/2017 | Background | 2.95 | 300 | 112 | 0.18 | 7.9 | 828 | 1,610 |
| 6/13/2017 | Background | 2.98 | 283 | 118 | 0.18 | 7.5 | 856 | 1,620 |
| 10/30/2017 | Detection | 2.60 | 295 | 116 | 0.20 | 7.2 | 833 | 1,570 |
| 1/22/2018 | Detection | 3.07 | 291 | 118 | -- | 7.2 | 862 | 1,620 |
| 5/9/2018 | Assessment | -- | -- | -- | 0.21 | 7.1 | -- | -- |
| 9/19/2018 | Assessment | 1.33 | 144 | 41.3 | 0.19 | 7.2 | 313 | 838 |
| 4/9/2019 | Assessment | 2.82 | 236 | 100 | 0.15 | 6.9 | 539 | 1,300 |
| 6/19/2019 | Assessment | 1.66 | 196 | 93.0 | 0.14 | 7.2 | 461 | 1,110 |
| 9/9/2019 | Assessment | 2.18 | 217 | 82.2 | 0.17 | 7.0 | 551 | 1,210 |
| 3/10/2020 | Assessment | -- | -- | -- | 0.22 | 6.4 | -- | -- |
| 5/14/2020 | Assessment | 4.65 | 205 | 113 | 0.25 | 6.7 | 667 | 1,390 |
| 10/9/2020 | Assessment | 3.58 | 188 | 57.9 | 0.20 | 6.7 | 483 | 1,080 |

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-1604D
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/26/2016 | Background | 0.14 | 0.48 | 29.1 | < 0.005 U | 0.14 | 0.4 | 1.76 | 1.38 | 0.18 | 0.106 | 0.059 | < 0.002 U | 19.8 | 0.9 | 0.235 |
| 11/1/2016 | Background | 0.15 | 0.59 | 28.4 | < 0.005 U | 0.17 | 0.5 | 1.78 | 1.056 | 0.19 | 0.039 | 0.057 | 0.036 | 20.0 | 1.0 | 0.261 |
| 12/20/2016 | Background | 0.14 | 0.57 | 30.3 | < 0.005 U | 0.17 | 0.798 | 1.92 | 1.45 | 0.17 | 0.02 J | 0.045 | < 0.002 U | 20.8 | 1.0 | 0.283 |
| 2/21/2017 | Background | 0.11 | 0.45 | 26.2 | < 0.005 U | 0.13 | 0.297 | 1.85 | 0.824 | 0.21 | 0.02 J | 0.050 | < 0.002 U | 17.4 | 0.7 | 0.264 |
| 3/28/2017 | Background | 0.13 | 0.41 | 28.9 | < 0.005 U | 0.13 | 0.416 | 1.74 | 0.806 | 0.19 | 0.022 | 0.064 | < 0.002 U | 18.2 | 0.7 | 0.336 |
| 4/19/2017 | Background | 0.12 | 0.49 | 27.9 | < 0.004 U | 0.09 | 0.323 | 1.60 | 1.537 | 0.20 | 0.584 | 0.051 | 0.003 J | 17.4 | 0.7 | 0.217 |
| 5/16/2017 | Background | 0.13 | 0.54 | 27.5 | < 0.004 U | 0.10 | 0.079 | 1.60 | 3.489 | 0.18 | 0.027 | 0.052 | < 0.002 U | 18.1 | 0.5 | 0.231 |
| 6/13/2017 | Background | 0.15 | 0.46 | 27.9 | < 0.008 U | 0.15 | 0.180 | 1.95 | 1.058 | 0.18 | 0.03 J | 0.058 | < 0.002 U | 18.3 | 0.8 | 0.256 |
| 5/9/2018 | Assessment | 0.04 J | 0.34 | 32.0 | < 0.004 U | 0.04 | 0.195 | 0.314 | 0.687 | 0.21 | 0.035 | 0.024 | < 0.002 U | 2.05 | 1.4 | 0.02 J |
| 9/19/2018 | Assessment | 0.04 J | 0.29 | 37.0 | < 0.004 U | 0.03 | 0.169 | 0.203 | 0.316 | 0.19 | 0.303 | 0.016 | < 0.002 U | 1.57 | 3.8 | 0.02 J |
| 4/9/2019 | Assessment | < 0.1 U | 0.4 J | 42.5 | < 0.1 U | 0.05 J | 0.2 J | 0.345 | 0.957 | 0.15 | < 0.1 U | 0.038 | < 0.002 U | < 2 U | 2.0 | < 0.5 U |
| 6/19/2019 | Assessment | 0.04 J | 0.28 | 52.9 | < 0.02 U | 0.04 J | 0.212 | 0.242 | 0.1922 | 0.14 | 0.07 J | < 0.009 U | < 0.002 U | 1 J | 3.1 | < 0.1 U |
| 9/9/2019 | Assessment | 0.03 J | 0.30 | 55.6 | < 0.02 U | 0.03 J | 0.345 | 0.181 | 0.464 | 0.17 | < 0.05 U | 0.0188 | < 0.002 U | 2 J | 3.4 | < 0.1 U |
| 3/10/2020 | Assessment | 0.02 J | 0.31 | 34.2 | < 0.02 U | 0.03 J | 0.311 | 0.138 | 0.834 | 0.22 | < 0.05 U | 0.0235 | < 0.002 U | 1 J | 0.8 | < 0.1 U |
| 5/14/2020 | Assessment | 0.03 J | 0.28 | 34.1 | -- | 0.03 J | 0.729 | 0.117 | 0.1393 | 0.25 | < 0.05 U | 0.0218 | -- | 1 J | 0.7 | < 0.1 U |
| 10/9/2020 | Assessment | 0.03 J | 0.29 | 27.3 | -- | 0.02 J | 1.02 | 0.140 | 0.123 | 0.20 | 0.06 J | 0.0190 | < 0.002 U | 1 J | 3.0 | < 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-1604S
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/26/2016 | Background | 2.12 | 178 | 83.9 | 0.20 | 7.0 | 602 | 1,280 |
| 11/1/2016 | Background | 1.90 | 167 | 99.4 | 0.21 | 7.1 | 626 | 1,310 |
| 12/20/2016 | Background | 2.35 | 165 | 99.9 | 0.19 | 7.2 | 618 | 1,300 |
| 2/21/2017 | Background | 3.08 | 168 | 112 | 0.21 | 7.0 | 634 | 1,430 |
| 3/28/2017 | Background | 4.04 | 180 | 116 | 0.20 | 6.9 | 663 | 1,420 |
| 4/19/2017 | Background | 3.68 | 191 | 130 | 0.21 | 7.0 | 716 | 1,500 |
| 5/16/2017 | Background | 3.63 | 202 | 122 | 0.19 | 7.7 | 708 | 1,510 |
| 6/13/2017 | Background | 3.48 | 182 | 112 | 0.20 | 7.5 | 685 | 1,400 |
| 10/30/2017 | Detection | 2.17 | 167 | 85.3 | 0.21 | 7.1 | 544 | 1,150 |
| 1/22/2018 | Detection | 2.36 | -- | 105 | -- | 6.9 | 602 | 1,312 |
| 5/9/2018 | Assessment | -- | -- | -- | 0.22 | 7.4 | -- | -- |
| 9/19/2018 | Assessment | 2.49 | 262 | 109 | 0.22 | 7.3 | 742 | 1,500 |
| 4/9/2019 | Assessment | 3.50 | 301 | 132 | 0.19 | 7.1 | 703 | 1,650 |
| 6/19/2019 | Assessment | 3.15 | 278 | 127 | 0.16 | 7.3 | 741 | 1,580 |
| 9/9/2019 | Assessment | 3.23 | 267 | 128 | 0.20 | 7.3 | 770 | 1,520 |
| 3/10/2020 | Assessment | -- | -- | -- | 0.24 | 6.7 | -- | -- |
| 5/14/2020 | Assessment | 3.68 | 250 | 116 | 0.25 | 6.9 | 715 | 1,520 |
| 10/9/2020 | Assessment | 2.59 | 265 | 107 | 0.21 | 7.0 | 635 | 1,360 |

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-1604S
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/26/2016 | Background | 0.04 J | 0.39 | 29.4 | < 0.005 U | 0.03 | 0.2 | 0.358 | 0.136 | 0.20 | 0.114 | 0.034 | < 0.002 U | 3.20 | 3.1 | 0.03 J |
| 11/1/2016 | Background | 0.04 J | 0.46 | 27.2 | < 0.005 U | 0.04 | 0.3 | 0.307 | 0.769 | 0.21 | 0.065 | 0.035 | < 0.002 U | 2.47 | 2.5 | 0.02 J |
| 12/20/2016 | Background | 0.04 J | 0.42 | 26.6 | < 0.005 U | 0.04 | 1.97 | 0.390 | 0.5256 | 0.19 | 0.093 | 0.023 | < 0.002 U | 2.71 | 2.7 | 0.03 J |
| 2/21/2017 | Background | 0.03 J | 0.42 | 26.7 | < 0.005 U | 0.04 | 0.379 | 0.501 | 0.92 | 0.21 | 0.140 | 0.033 | < 0.002 U | 2.52 | 2.2 | 0.03 J |
| 3/28/2017 | Background | 0.03 J | 0.37 | 31.6 | < 0.005 U | 0.03 | 0.692 | 0.308 | 0.585 | 0.20 | 0.055 | 0.042 | < 0.002 U | 2.53 | 2.2 | 0.119 |
| 4/19/2017 | Background | 0.03 J | 0.44 | 28.9 | < 0.004 U | 0.04 | 0.158 | 0.317 | 0.722 | 0.21 | 0.051 | 0.041 | 0.003 J | 2.53 | 1.7 | 0.02 J |
| 5/16/2017 | Background | 0.04 J | 0.51 | 32.2 | < 0.004 U | 0.04 | 0.098 | 0.317 | 2.577 | 0.19 | 0.100 | 0.033 | < 0.002 U | 2.54 | 2.0 | 0.04 J |
| 6/13/2017 | Background | 0.03 J | 0.41 | 28.7 | < 0.004 U | 0.04 | 0.149 | 0.308 | 0.598 | 0.20 | 0.033 | 0.038 | < 0.002 U | 2.41 | 2.5 | 0.02 J |
| 5/9/2018 | Assessment | 0.13 | 0.33 | 28.7 | 0.024 | 0.15 | 0.107 | 1.83 | 1.173 | 0.22 | 0.034 | 0.051 | < 0.002 U | 16.2 | 1.0 | 0.220 |
| 9/19/2018 | Assessment | 0.13 | 0.32 | 26.6 | < 0.004 U | 0.15 | 0.093 | 1.88 | 1.159 | 0.22 | 0.02 J | 0.052 | < 0.002 U | 15.6 | 0.8 | 0.251 |
| 4/9/2019 | Assessment | 0.2 J | 0.54 | 29.1 | < 0.1 U | 0.27 | 0.3 J | 2.41 | 1.472 | 0.19 | < 0.1 U | 0.061 | < 0.002 U | 17.8 | 1.2 | < 0.5 U |
| 6/19/2019 | Assessment | 0.15 | 0.33 | 29.0 | < 0.02 U | 0.21 | 0.09 J | 2.16 | 1.256 | 0.16 | < 0.02 U | 0.032 | < 0.002 U | 16.6 | 1.0 | 0.3 J |
| 9/9/2019 | Assessment | 0.14 | 0.34 | 29.0 | < 0.02 U | 0.21 | 0.1 J | 2.14 | 1.15 | 0.20 | < 0.05 U | 0.0476 | < 0.002 U | 16.3 | 1.0 | 0.3 J |
| 3/10/2020 | Assessment | 0.14 | 0.29 | 28.9 | < 0.02 U | 0.12 | 0.323 | 1.72 | 1.662 | 0.24 | < 0.05 U | 0.0390 | < 0.002 U | 13.7 | 1.2 | 0.2 J |
| 5/14/2020 | Assessment | 0.15 | 0.30 | 29.1 | -- | 0.19 | 0.1 J | 1.93 | 1.038 | 0.25 | < 0.05 U | 0.0419 | -- | 14.9 | 1.1 | 0.2 J |
| 10/9/2020 | Assessment | 0.16 | 0.32 | 28.2 | -- | 0.21 | 0.798 | 2.08 | 9.989 | 0.21 | < 0.05 U | 0.0384 | < 0.002 U | 15.0 | 0.9 | 0.3 J |

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-1605D
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/27/2016 | Background | 12.2 | 462 | 195 | 0.18 | 7.6 | 1,480 | 2,650 |
| 11/2/2016 | Background | 9.96 | 381 | 195 | 0.19 | 7.4 | 1,500 | 2,510 |
| 12/20/2016 | Background | 9.35 | 341 | 168 | 0.18 | 7.4 | 1,290 | 2,300 |
| 2/21/2017 | Background | 9.16 | 318 | 163 | 0.20 | 7.3 | 1,190 | 2,290 |
| 3/28/2017 | Background | 11.6 | 344 | 169 | 0.20 | 7.2 | 1,200 | 2,350 |
| 4/18/2017 | Background | 9.06 | 360 | 172 | 0.20 | 7.5 | 1,180 | 2,280 |
| 5/16/2017 | Background | 8.77 | 374 | 187 | 0.20 | 7.9 | 1,130 | 2,240 |
| 6/13/2017 | Background | 9.09 | 351 | 196 | 0.17 | -- | 1,190 | 2,260 |
| 10/31/2017 | Detection | 7.83 | 324 | 198 | 0.21 | 7.3 | 1,170 | 2,170 |
| 1/22/2018 | Detection | 9.33 | 321 | 197 | -- | 7.2 | 1,070 | 2,060 |
| 5/9/2018 | Assessment | -- | -- | -- | 0.23 | 7.5 | -- | -- |
| 9/19/2018 | Assessment | 9.11 | 278 | 188 | 0.22 | 7.6 | 972 | 1,960 |
| 4/9/2019 | Assessment | 6.90 | 247 | 169 | 0.22 | 7.3 | 791 | 1,710 |
| 6/19/2019 | Assessment | 6.57 | 265 | 165 | 0.19 | 7.5 | 877 | 1,890 |
| 9/10/2019 | Assessment | 8.57 | 283 | 168 | 0.17 | 7.2 | 974 | 2,050 |
| 3/10/2020 | Assessment | -- | -- | -- | 0.19 | 6.9 | -- | -- |
| 5/19/2020 | Assessment | 6.92 | 265 | 169 | 0.17 | 7.0 | 848 | 1,670 |
| 10/9/2020 | Assessment | 4.81 | 247 | 109 | 0.20 | 7.2 | 682 | 1,490 |

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-1605D
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/27/2016 | Background | 0.03 J | 2.29 | 31.5 | < 0.01 U | 0.04 | 0.1 | 1.91 | 1.06 | 0.18 | 0.080 | 0.085 | < 0.002 U | 54.6 | 0.2 | 0.06 J |
| 11/2/2016 | Background | 0.03 J | 2.48 | 30.6 | < 0.01 U | 0.04 | 0.2 | 1.79 | 1.925 | 0.19 | 0.044 | 0.078 | < 0.002 U | 52.4 | 0.2 | 0.05 J |
| 12/20/2016 | Background | 0.03 J | 2.26 | 28.2 | < 0.01 U | 0.04 J | 2.29 | 1.75 | 2.662 | 0.18 | 0.03 J | 0.063 | < 0.002 U | 54.7 | 0.3 | 0.05 J |
| 2/21/2017 | Background | 0.04 J | 2.23 | 25.9 | < 0.005 U | 0.03 | 0.282 | 1.84 | 1.033 | 0.20 | 0.021 | 0.071 | < 0.002 U | 46.8 | 0.2 | 0.138 |
| 3/28/2017 | Background | 0.04 J | 2.01 | 27.9 | < 0.005 U | 0.03 | 0.556 | 1.69 | 0.578 | 0.20 | 0.02 J | 0.086 | < 0.002 U | 44.6 | 0.2 | 0.090 |
| 4/18/2017 | Background | 0.03 J | 2.25 | 25.8 | < 0.008 U | 0.02 J | 0.127 | 1.69 | 0.821 | 0.20 | 0.02 J | 0.077 | 0.002 J | 43.2 | 0.2 J | 0.04 J |
| 5/16/2017 | Background | 0.03 J | 2.45 | 26.3 | < 0.004 U | 0.02 J | 0.099 | 1.63 | 3.433 | 0.20 | 0.01 J | 0.075 | < 0.002 U | 48.1 | 0.2 | 0.04 J |
| 6/13/2017 | Background | 0.04 J | 1.99 | 27.2 | < 0.008 U | 0.04 | 0.120 | 1.86 | 0.668 | 0.17 | 0.02 J | 0.081 | < 0.002 U | 45.5 | 0.4 | 0.05 J |
| 5/9/2018 | Assessment | 0.03 J | 2.22 | 21.6 | < 0.004 U | 0.01 J | 0.067 | 1.51 | 0.523 | 0.23 | 0.02 J | 0.062 | < 0.002 U | 46.4 | 0.2 | 0.04 J |
| 9/19/2018 | Assessment | 0.04 J | 2.51 | 25.9 | < 0.004 U | 0.02 J | 0.229 | 1.80 | 0.759 | 0.22 | 0.01 J | 0.060 | < 0.002 U | 47.9 | 0.3 | 0.05 J |
| 4/9/2019 | Assessment | 0.04 J | 2.81 | 26.4 | < 0.02 U | 0.01 J | 0.06 J | 1.56 | 0.543 | 0.22 | 0.03 J | 0.075 | < 0.002 U | 40.6 | 0.2 | < 0.1 U |
| 6/19/2019 | Assessment | < 0.04 U | 2.67 | 28.6 | < 0.04 U | 0.02 J | 0.2 J | 1.65 | 0.831 | 0.19 | < 0.04 U | 0.02 J | < 0.002 U | 40.0 | 0.2 J | < 0.2 U |
| 9/10/2019 | Assessment | 0.03 J | 2.78 | 33.1 | < 0.02 U | 0.03 J | 0.04 J | 1.69 | 1.641 | 0.17 | < 0.05 U | 0.0561 | < 0.002 U | 39.7 | 0.3 | < 0.1 U |
| 3/10/2020 | Assessment | 0.03 J | 3.01 | 29.6 | < 0.02 U | 0.02 J | 0.08 J | 1.67 | 0.3851 | 0.19 | < 0.05 U | 0.0502 | < 0.002 U | 32.7 | 0.2 J | < 0.1 U |
| 5/19/2020 | Assessment | 0.04 J | 2.73 | 25.7 | -- | 0.01 J | 0.1 J | 1.45 | 0.425 | 0.17 | < 0.05 U | 0.0495 | -- | 32.8 | 0.2 J | < 0.1 U |
| 10/9/2020 | Assessment | < 0.02 U | 3.09 | 23.0 | -- | < 0.01 U | 0.208 | 1.43 | 0.8083 | 0.20 | 0.05 J | 0.0439 | < 0.002 U | 35.7 | 0.09 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-1605S
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/27/2016 | Background | 8.30 | 224 | 150 | 0.24 | 7.5 | 965 | 1,910 |
| 11/1/2016 | Background | 6.55 | 220 | 159 | 0.25 | 7.3 | 1,010 | 1,930 |
| 12/20/2016 | Background | 7.30 | 279 | 173 | 0.22 | 7.4 | 1,180 | 2,160 |
| 2/21/2017 | Background | 9.04 | 249 | 179 | 0.25 | 7.2 | 1,110 | 2,220 |
| 3/28/2017 | Background | 10.8 | 261 | 212 | 0.25 | 7.1 | 1,110 | 2,250 |
| 4/18/2017 | Background | 8.69 | 244 | 180 | 0.23 | 7.4 | 1,100 | 2,120 |
| 5/16/2017 | Background | 8.75 | 251 | 217 | 0.26 | 7.7 | 1,060 | 2,160 |
| 6/13/2017 | Background | 8.80 | 218 | 191 | 0.24 | 7.8 | 1,000 | 1,980 |
| 10/31/2017 | Detection | 5.88 | 212 | 222 | 0.25 | 7.2 | 1,040 | 2,000 |
| 1/22/2018 | Detection | 10.1 | 231 | 220 | -- | 7.1 | 976 | 1,970 |
| 5/9/2018 | Assessment | -- | -- | -- | 0.30 | 7.2 | -- | -- |
| 9/19/2018 | Assessment | 7.75 | 182 | 171 | 0.32 | 7.4 | 793 | 1,650 |
| 4/9/2019 | Assessment | 9.39 | 164 | 140 | 0.33 | 7.2 | 599 | 1,450 |
| 6/19/2019 | Assessment | 7.02 | 156 | 140 | 0.23 | 7.4 | 649 | 1,510 |
| 9/10/2019 | Assessment | 8.05 | 174 | 149 | 0.26 | 7.2 | 694 | 1,470 |
| 3/10/2020 | Assessment | -- | -- | -- | 0.30 | 6.9 | -- | -- |
| 5/19/2020 | Assessment | 4.83 | 154 | 93.5 | 0.28 | 6.9 | 543 | 1,160 |
| 10/9/2020 | Assessment | 3.99 | 163 | 85.4 | 0.28 | 7.0 | 492 | 1,150 |

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-1605S
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/27/2016 | Background | 0.16 | 1.38 | 49.6 | 0.02 J | 0.13 | 0.6 | 3.16 | 0.777 | 0.24 | 2.18 | 0.086 | < 0.002 U | 25.8 | 1.1 | 0.174 |
| 11/1/2016 | Background | 0.07 | 0.93 | 38.2 | 0.009 J | 0.08 | 0.7 | 1.26 | 2.692 | 0.25 | 0.793 | 0.084 | < 0.002 U | 23.9 | 0.9 | 0.055 |
| 12/20/2016 | Background | 0.07 J | 0.88 | 37.0 | < 0.01 U | 0.08 | 2.85 | 0.861 | 0.337 | 0.22 | 0.410 | 0.076 | < 0.002 U | 22.9 | 0.7 | 0.05 J |
| 2/21/2017 | Background | 0.04 J | 0.86 | 36.0 | 0.007 J | 0.08 | 0.390 | 1.10 | 0.785 | 0.25 | 0.636 | 0.068 | < 0.002 U | 17.5 | 1.1 | 0.055 |
| 3/28/2017 | Background | 0.03 J | 0.63 | 32.5 | < 0.005 U | 0.06 | 0.349 | 0.448 | 0.466 | 0.25 | 0.181 | 0.076 | < 0.002 U | 15.4 | 1.0 | 0.102 |
| 4/18/2017 | Background | 0.06 J | 0.74 | 31.9 | < 0.008 U | 0.08 | 0.245 | 0.715 | 0.827 | 0.23 | 0.285 | 0.067 | 0.003 J | 20.8 | 3.0 | 0.04 J |
| 5/16/2017 | Background | 0.06 J | 0.88 | 33.3 | < 0.008 U | 0.08 | 0.585 | 0.647 | 2.733 | 0.26 | 0.382 | 0.076 | < 0.002 U | 18.6 | 1.7 | 0.06 J |
| 6/13/2017 | Background | 0.05 J | 0.75 | 30.8 | < 0.008 U | 0.08 | 0.387 | 0.708 | 0.611 | 0.24 | 0.541 | 0.071 | < 0.002 U | 17.8 | 1.7 | 0.05 J |
| 5/9/2018 | Assessment | 0.04 J | 0.50 | 23.5 | < 0.004 U | 0.06 | 0.083 | 0.518 | 0.3045 | 0.30 | 0.056 | 0.051 | < 0.002 U | 15.6 | 2.0 | 0.04 J |
| 9/19/2018 | Assessment | 0.04 J | 0.49 | 23.1 | < 0.004 U | 0.05 | 0.644 | 0.360 | 0.347 | 0.32 | 0.093 | 0.049 | < 0.002 U | 15.1 | 1.0 | 0.04 J |
| 4/9/2019 | Assessment | 0.05 J | 0.64 | 25.2 | < 0.02 U | 0.05 | 0.293 | 0.631 | 0.369 | 0.33 | 0.331 | 0.079 | < 0.002 U | 15.9 | 0.7 | < 0.1 U |
| 6/19/2019 | Assessment | 0.04 J | 0.47 | 23.6 | < 0.02 U | 0.05 J | 0.1 J | 0.279 | 0.424 | 0.23 | 0.08 J | 0.040 | < 0.002 U | 13.6 | 0.6 | < 0.1 U |
| 9/10/2019 | Assessment | 0.04 J | 0.59 | 29.6 | < 0.02 U | 0.05 J | 0.237 | 0.379 | 0.542 | 0.26 | 0.202 | 0.0524 | < 0.002 U | 14.2 | 0.4 | < 0.1 U |
| 3/10/2020 | Assessment | 0.08 J | 0.62 | 26.5 | < 0.02 U | 0.04 J | 0.305 | 0.723 | 0.842 | 0.30 | 0.497 | 0.0558 | < 0.002 U | 12.8 | 0.8 | < 0.1 U |
| 5/19/2020 | Assessment | 0.04 J | 0.47 | 21.1 | -- | 0.03 J | 0.1 J | 0.208 | 0.639 | 0.28 | < 0.05 U | 0.0523 | -- | 12.3 | 0.7 | < 0.1 U |
| 10/9/2020 | Assessment | 0.04 J | 0.47 | 24.6 | -- | 0.03 J | 0.266 | 0.195 | 1.4891 | 0.28 | 0.05 J | 0.0470 | < 0.002 U | 11.2 | 0.5 | < 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-1606D
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/27/2016 | Background | 4.29 | 278 | 190 | 0.25 | 7.2 | 813 | 1,710 |
| 11/2/2016 | Background | 3.97 | 252 | 201 | 0.28 | 7.4 | 796 | 1,720 |
| 12/20/2016 | Background | 4.96 | 260 | 206 | 0.24 | 7.5 | 796 | 1,690 |
| 2/21/2017 | Background | 5.48 | 242 | 190 | 0.26 | 7.3 | 759 | 1,670 |
| 3/28/2017 | Background | 6.90 | 247 | 187 | 0.26 | 7.2 | 739 | 1,700 |
| 4/18/2017 | Background | 5.46 | 274 | 104 | 0.26 | 7.4 | 385 | 1,690 |
| 5/16/2017 | Background | 5.26 | 278 | 218 | 0.26 | 8.0 | 764 | 1,730 |
| 6/13/2017 | Background | 5.90 | 262 | 219 | 0.24 | 7.5 | 752 | 1,680 |
| 10/31/2017 | Detection | 7.03 | 287 | 213 | 0.24 | 7.3 | 770 | 1,590 |
| 1/23/2018 | Detection | 9.59 | 322 | 237 | -- | 7.4 | 760 | 1,730 |
| 5/9/2018 | Assessment | -- | -- | -- | 0.26 | 7.4 | -- | -- |
| 9/19/2018 | Assessment | 7.27 | 260 | 201 | 0.26 | 7.2 | 722 | 1,610 |
| 4/8/2019 | Assessment | 7.32 | 265 | 214 | 0.26 | 7.2 | 682 | 1,600 |
| 6/19/2019 | Assessment | 7.79 | 281 | 231 | 0.1 J | 7.4 | 693 | 1,690 |
| 9/10/2019 | Assessment | 6.38 | 281 | 244 | 0.49 | 7.4 | 588 | 1,700 |
| 3/10/2020 | Assessment | -- | -- | -- | 0.27 | 7.0 | -- | -- |
| 5/19/2020 | Assessment | 5.92 | 270 | 178 | 0.24 | 7.0 | 756 | 1,600 |
| 10/8/2020 | Assessment | 6.85 | 273 | 208 | 0.23 | 7.1 | 694 | 1,650 |

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-1606D
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/27/2016 | Background | 0.19 | 0.71 | 64.0 | 0.005 J | 0.07 | 0.3 | 2.20 | 8.459 | 0.25 | 0.522 | 0.129 | < 0.002 U | 81.4 | 1.8 | 0.123 |
| 11/2/2016 | Background | 0.19 | 0.84 | 62.6 | < 0.005 U | 0.07 | 0.9 | 1.92 | 3.659 | 0.28 | 0.491 | 0.120 | < 0.002 U | 81.2 | 4.7 | 0.092 |
| 12/20/2016 | Background | 0.16 | 0.63 | 58.4 | < 0.005 U | 0.06 | 0.736 | 1.52 | 1.179 | 0.24 | 0.164 | 0.110 | < 0.002 U | 83.2 | 3.6 | 0.094 |
| 2/21/2017 | Background | 0.16 | 0.51 | 52.6 | < 0.005 U | 0.07 | 0.300 | 1.33 | 1.71 | 0.26 | 0.082 | 0.109 | < 0.002 U | 76.6 | 4.1 | 0.119 |
| 3/28/2017 | Background | 0.15 | 0.44 | 53.6 | < 0.005 U | 0.05 | 0.541 | 1.17 | 1.459 | 0.26 | 0.087 | 0.130 | < 0.002 U | 73.3 | 3.6 | 0.113 |
| 4/18/2017 | Background | 0.25 | 1.38 | 64.2 | 0.01 J | 0.08 | 0.853 | 4.26 | 1.212 | 0.26 | 2.04 | 0.119 | 0.004 J | 71.5 | 4.1 | 0.097 |
| 5/16/2017 | Background | 0.19 | 0.63 | 56.7 | 0.031 | 0.07 | 0.163 | 1.39 | 3.18 | 0.26 | 0.162 | 0.124 | < 0.002 U | 79.1 | 5.9 | 0.095 |
| 6/13/2017 | Background | 0.16 | 0.52 | 52.0 | < 0.008 U | 0.08 | 0.153 | 1.46 | 1.026 | 0.24 | 0.084 | 0.132 | < 0.002 U | 77.8 | 8.1 | 0.09 J |
| 5/9/2018 | Assessment | 0.16 | 0.44 | 53.0 | < 0.004 U | 0.07 | 0.198 | 1.40 | 0.972 | 0.26 | 0.115 | 0.112 | < 0.002 U | 70.3 | 2.6 | 0.086 |
| 9/19/2018 | Assessment | 0.15 | 0.38 | 48.9 | 0.004 J | 0.07 | 0.151 | 1.17 | 0.4378 | 0.26 | 0.01 J | 0.107 | < 0.002 U | 65.3 | 3.3 | 0.108 |
| 4/8/2019 | Assessment | 0.15 | 0.35 | 47.3 | < 0.02 U | 0.07 | 0.1 J | 1.25 | 0.94 | 0.26 | 0.03 J | 0.124 | < 0.002 U | 71.8 | 8.1 | < 0.1 U |
| 6/19/2019 | Assessment | 0.14 | 0.37 | 49.4 | < 0.02 U | 0.09 | 0.07 J | 1.36 | 0.933 | 0.1 J | < 0.02 U | 0.058 | < 0.002 U | 68.3 | 9.6 | 0.1 J |
| 9/10/2019 | Assessment | 0.15 | 0.40 | 51.4 | < 0.02 U | 0.08 | 0.1 J | 1.09 | 2.2714 | 0.49 | < 0.05 U | 0.0835 | < 0.002 U | 68.5 | 1.0 | < 0.1 U |
| 3/10/2020 | Assessment | 0.14 | 0.35 | 45.3 | < 0.02 U | 0.05 | 0.2 J | 1.11 | 0.946 | 0.27 | < 0.05 U | 0.0700 | < 0.002 U | 62.5 | 0.5 | < 0.1 U |
| 5/19/2020 | Assessment | 0.15 | 0.32 | 45.6 | -- | 0.06 | 0.1 J | 1.10 | 0.975 | 0.24 | < 0.05 U | 0.0681 | -- | 67.0 | 0.5 | < 0.1 U |
| 10/8/2020 | Assessment | 0.14 | 0.36 | 45.6 | -- | 0.08 | 0.247 | 1.54 | 0.908 | 0.23 | < 0.05 U | 0.0633 | < 0.002 U | 63.6 | 4.2 | < 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-1606S
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/27/2016 | Background | 5.25 | 219 | 182 | 0.50 | 6.0 | 621 | 1,470 |
| 11/2/2016 | Background | 4.57 | 183 | 183 | 0.57 | 7.2 | 638 | 1,470 |
| 12/20/2016 | Background | 5.35 | 200 | 170 | 0.46 | 7.3 | 621 | 1,420 |
| 2/21/2017 | Background | 5.03 | 211 | 231 | 0.46 | 7.1 | 578 | 1,500 |
| 3/28/2017 | Background | 6.67 | 217 | 226 | 0.45 | 7.0 | 589 | 1,500 |
| 4/18/2017 | Background | 5.80 | 228 | 217 | 0.43 | 7.2 | 615 | 1,540 |
| 5/16/2017 | Background | 5.72 | 228 | 227 | 0.45 | 7.7 | 635 | 3,230 |
| 6/13/2017 | Background | 6.12 | 230 | 230 | 0.45 | 7.4 | 643 | 1,540 |
| 10/31/2017 | Detection | 9.54 | 226 | 187 | 0.46 | 7.1 | 644 | 1,410 |
| 1/23/2018 | Detection | 6.62 | 218 | 184 | 0.43 | 7.2 | 660 | 1,450 |
| 5/9/2018 | Assessment | -- | -- | -- | 0.44 | 6.9 | -- | -- |
| 9/19/2018 | Assessment | 5.87 | 199 | 219 | 0.46 | 7.1 | 571 | 1,370 |
| 4/8/2019 | Assessment | 7.68 | 229 | 223 | 0.54 | 6.8 | 592 | 1,480 |
| 6/19/2019 | Assessment | 6.08 | 223 | 232 | 0.25 | 7.2 | 581 | 1,490 |
| 9/10/2019 | Assessment | 6.19 | 229 | 221 | 0.28 | 7.3 | 705 | 1,460 |
| 3/10/2020 | Assessment | -- | -- | -- | 0.40 | 6.8 | -- | -- |
| 5/19/2020 | Assessment | 5.94 | 207 | 181 | 0.38 | 6.7 | 646 | 1,400 |
| 10/8/2020 | Assessment | 6.35 | 206 | 172 | 0.38 | 6.9 | 572 | 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-1606S
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/27/2016 | Background | 0.16 | 0.88 | 76.7 | < 0.005 U | 0.08 | 0.2 | 0.466 | 0.592 | 0.50 | 0.234 | 0.116 | < 0.002 U | 112 | 1.2 | 0.074 |
| 11/2/2016 | Background | 0.17 | 0.94 | 69.7 | < 0.005 U | 0.07 | 0.4 | 0.432 | 1.55 | 0.57 | 0.207 | 0.103 | < 0.002 U | 112 | 1.0 | 0.060 |
| 12/20/2016 | Background | 0.16 | 0.83 | 71.6 | < 0.005 U | 0.07 | 1.26 | 0.280 | 1.656 | 0.46 | 0.084 | 0.102 | < 0.002 U | 101 | 0.9 | 0.063 |
| 2/21/2017 | Background | 0.15 | 0.88 | 77.2 | < 0.005 U | 0.08 | 0.384 | 0.372 | 0.993 | 0.46 | 0.158 | 0.108 | < 0.002 U | 93.1 | 0.7 | 0.086 |
| 3/28/2017 | Background | 0.14 | 0.78 | 75.7 | < 0.005 U | 0.06 | 0.742 | 0.258 | 0.945 | 0.45 | 0.096 | 0.126 | < 0.002 U | 90.1 | 0.7 | 0.100 |
| 4/18/2017 | Background | 0.16 | 0.86 | 74.2 | < 0.004 U | 0.07 | 0.134 | 0.234 | 1.303 | 0.43 | 0.070 | 0.117 | 0.002 J | 92.4 | 0.8 | 0.062 |
| 5/16/2017 | Background | 0.16 | 0.90 | 74.1 | < 0.004 U | 0.07 | 0.093 | 0.241 | 2.167 | 0.45 | 0.062 | 0.110 | < 0.002 U | 90.2 | 0.9 | 0.069 |
| 6/13/2017 | Background | 0.16 | 0.81 | 77.1 | < 0.008 U | 0.09 | 0.178 | 0.281 | 1.28 | 0.45 | 0.090 | 0.118 | < 0.002 U | 95.7 | 0.9 | 0.07 J |
| 5/9/2018 | Assessment | 0.14 | 0.72 | 73.2 | < 0.004 U | 0.08 | 0.056 | 0.318 | 0.3443 | 0.44 | 0.040 | 0.107 | < 0.002 U | 70.2 | 2.0 | 0.076 |
| 9/19/2018 | Assessment | 0.13 | 0.69 | 64.8 | 0.005 J | 0.06 | 0.297 | 0.260 | 0.439 | 0.46 | 0.02 J | 0.096 | < 0.002 U | 70.6 | 2.8 | 0.112 |
| 4/8/2019 | Assessment | 0.15 | 0.70 | 63.1 | < 0.02 U | 0.07 | 0.08 J | 0.320 | 0.595 | 0.54 | 0.107 | 0.117 | < 0.002 U | 67.7 | 1.4 | < 0.1 U |
| 6/19/2019 | Assessment | 0.15 | 0.63 | 67.2 | < 0.02 U | 0.08 | 0.08 J | 0.171 | 1.0123 | 0.25 | 0.111 | 0.056 | < 0.002 U | 58.9 | 1.3 | 0.1 J |
| 9/10/2019 | Assessment | 0.13 | 0.67 | 70.4 | < 0.02 U | 0.07 | 0.08 J | 0.312 | 2.682 | 0.28 | < 0.05 U | 0.0877 | < 0.002 U | 54.9 | 2.7 | < 0.1 U |
| 3/10/2020 | Assessment | 0.13 | 0.62 | 60.9 | < 0.02 U | 0.07 | 0.1 J | 0.322 | 0.434 | 0.40 | 0.05 J | 0.0721 | < 0.002 U | 51.7 | 4.4 | < 0.1 U |
| 5/19/2020 | Assessment | 0.14 | 0.65 | 59.8 | -- | 0.06 | 0.1 J | 0.435 | 0.3814 | 0.38 | < 0.05 U | 0.0730 | -- | 56.0 | 5.3 | < 0.1 U |
| 10/8/2020 | Assessment | 0.14 | 0.68 | 57.4 | -- | 0.07 | 0.492 | 0.148 | 0.682 | 0.38 | < 0.05 U | 0.0701 | < 0.002 U | 56.4 | 1.9 | < 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-1607D
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/27/2016 | Background | 1.64 | 141 | 88.3 | 0.54 | 6.9 | 285 | 744 |
| 11/2/2016 | Background | 1.42 | 155 | 103 | 0.61 | 7.8 | 376 | 856 |
| 12/20/2016 | Background | 1.46 | 187 | 118 | 0.50 | 7.7 | 474 | 1,050 |
| 1/23/2017 | Background | -- | -- | -- | -- | 7.5 | -- | -- |
| 2/21/2017 | Background | 1.54 | 165 | 107 | 0.51 | 7.6 | 415 | 1,010 |
| 3/29/2017 | Background | 1.89 | 162 | 106 | 0.52 | 7.6 | 393 | 938 |
| 4/18/2017 | Background | 1.58 | 168 | 104 | 0.52 | 7.6 | 383 | 904 |
| 5/16/2017 | Background | 1.54 | 156 | 102 | 0.52 | 8.4 | 347 | 876 |
| 6/14/2017 | Background | 1.50 | 159 | 104 | 0.49 | 7.6 | 365 | 872 |
| 10/31/2017 | Detection | 1.76 | 214 | 138 | 0.47 | 7.6 | 626 | 1,290 |
| 1/23/2018 | Detection | 2.34 | 244 | 150 | 0.44 | 7.5 | 668 | 1,380 |
| 5/10/2018 | Assessment | -- | -- | -- | 0.54 | 7.5 | -- | -- |
| 9/20/2018 | Assessment | 2.44 | 222 | 163 | 0.52 | 7.7 | 662 | 1,450 |
| 4/8/2019 | Assessment | 3.10 | 232 | 162 | 0.52 | 7.4 | 656 | 1,480 |
| 6/19/2019 | Assessment | 3.14 | 234 | 167 | 0.40 | 7.8 | 710 | 1,600 |
| 9/10/2019 | Assessment | 3.65 | 233 | 174 | 0.56 | 7.7 | 699 | 1,610 |
| 3/11/2020 | Assessment | -- | -- | -- | 0.41 | 7.1 | -- | -- |
| 5/20/2020 | Assessment | 3.89 | 228 | 181 | 0.51 | 7.2 | 722 | 1,620 |
| 10/8/2020 | Assessment | 4.16 | 232 | 170 | 0.49 | 7.3 | 703 | 1,650 |

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-1607D
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/27/2016 | Background | 0.04 J | 0.91 | 117 | < 0.005 U | 0.02 J | 0.3 | 0.439 | 0.86 | 0.54 | 0.179 | 0.068 | < 0.002 U | 96.2 | 0.1 | 0.05 J |
| 11/2/2016 | Background | 0.03 J | 1.02 | 155 | < 0.005 U | 0.02 J | 0.7 | 0.396 | 3.997 | 0.61 | 0.058 | 0.069 | < 0.002 U | 91.1 | 0.07 J | 0.04 J |
| 12/20/2016 | Background | 0.03 J | 1.02 | 168 | < 0.005 U | 0.005 J | 2.07 | 0.526 | 1.689 | 0.50 | 0.038 | 0.075 | < 0.002 U | 89.6 | 0.03 J | 0.04 J |
| 2/21/2017 | Background | 0.03 J | 1.14 | 133 | < 0.005 U | < 0.004 U | 0.090 | 0.481 | 0.883 | 0.51 | 0.041 | 0.072 | < 0.002 U | 87.7 | 0.03 J | 0.04 J |
| 3/29/2017 | Background | 0.05 | 1.24 | 140 | 0.008 J | 0.03 | 0.602 | 0.805 | 1.872 | 0.52 | 0.628 | 0.087 | 0.002 J | 85.9 | 0.5 | 0.062 |
| 4/18/2017 | Background | 0.03 J | 1.00 | 126 | < 0.004 U | < 0.005 U | 0.133 | 0.414 | 1.535 | 0.52 | 0.070 | 0.079 | 0.002 J | 81.8 | 0.05 J | 0.02 J |
| 5/16/2017 | Background | 0.03 J | 1.11 | 129 | < 0.004 U | < 0.005 U | 0.078 | 0.399 | 1.265 | 0.52 | 0.041 | 0.087 | < 0.002 U | 91.2 | 0.04 J | 0.02 J |
| 6/14/2017 | Background | 0.03 J | 0.98 | 131 | < 0.004 U | < 0.005 U | 0.141 | 0.439 | 1.764 | 0.49 | 0.124 | 0.088 | < 0.002 U | 90.8 | 0.03 J | 0.04 J |
| 5/10/2018 | Assessment | 0.03 J | 1.15 | 73.5 | < 0.004 U | < 0.005 U | 0.051 | 0.521 | 1.254 | 0.54 | 0.043 | 0.089 | < 0.002 U | 80.9 | < 0.03 U | 0.02 J |
| 9/20/2018 | Assessment | 0.03 J | 1.34 | 92.3 | < 0.004 U | < 0.005 U | 0.158 | 0.769 | 0.926 | 0.52 | 0.044 | 0.104 | < 0.002 U | 83.4 | < 0.03 U | 0.04 J |
| 4/8/2019 | Assessment | 0.03 J | 1.31 | 75.7 | < 0.02 U | < 0.01 U | 0.07 J | 0.778 | 1.3269 | 0.52 | 0.05 J | 0.127 | < 0.002 U | 79.8 | 0.05 J | < 0.1 U |
| 6/19/2019 | Assessment | 0.03 J | 1.61 | 82.3 | < 0.02 U | < 0.01 U | 0.1 J | 0.799 | 1.31 | 0.40 | 0.07 J | 0.072 | < 0.002 U | 81.8 | 0.06 J | < 0.1 U |
| 9/10/2019 | Assessment | 0.03 J | 1.53 | 79.3 | < 0.02 U | 0.01 J | 0.05 J | 0.848 | 1.855 | 0.56 | < 0.05 U | 0.110 | < 0.002 U | 82.1 | 0.09 J | < 0.1 U |
| 3/11/2020 | Assessment | < 0.02 U | 1.56 | 68.3 | < 0.02 U | < 0.01 U | 0.08 J | 0.846 | 2.552 | 0.41 | < 0.05 U | 0.108 | < 0.002 U | 79.6 | 0.04 J | < 0.1 U |
| 5/20/2020 | Assessment | 0.03 J | 1.42 | 65.6 | -- | < 0.01 U | 0.2 J | 0.913 | 0.815 | 0.51 | 0.05 J | 0.104 | -- | 83.5 | 0.08 J | < 0.1 U |
| 10/8/2020 | Assessment | 0.03 J | 1.80 | 75.8 | -- | < 0.01 U | 0.244 | 1.01 | 1.304 | 0.49 | < 0.05 U | 0.0966 | < 0.002 U | 83.8 | 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-1607S
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/27/2016 | Background | -- | -- | -- | -- | 7.6 | -- | -- |
| 11/2/2016 | Background | 1.38 | 126 | 90.8 | 0.32 | 7.6 | 214 | 698 |
| 12/21/2016 | Background | 1.02 | 129 | 92.7 | 0.33 | 7.7 | 246 | 716 |
| 2/21/2017 | Background | 1.27 | 131 | 91.9 | 0.29 | 7.5 | 244 | 746 |
| 3/28/2017 | Background | 1.70 | 131 | 93.1 | 0.28 | 7.4 | 233 | 706 |
| 4/18/2017 | Background | 1.65 | 135 | 92.6 | 0.30 | 7.6 | 225 | 678 |
| 5/16/2017 | Background | 1.64 | 133 | 97.5 | 0.29 | 8.2 | 221 | 746 |
| 6/14/2017 | Background | 1.74 | 136 | 96.3 | 0.27 | 7.5 | 229 | 708 |
| 10/31/2017 | Detection | 1.32 | 165 | 100 | 0.28 | 7.5 | 343 | 860 |
| 1/23/2018 | Detection | 1.49 | -- | 111 | -- | 7.4 | -- | -- |
| 5/10/2018 | Assessment | -- | -- | -- | 0.29 | 7.4 | -- | -- |
| 9/20/2018 | Assessment | 1.71 | 220 | 151 | 0.28 | 7.6 | 478 | 1,160 |
| 4/8/2019 | Assessment | 2.35 | 226 | 153 | 0.26 | 7.2 | 504 | 1,310 |
| 6/19/2019 | Assessment | 2.46 | 233 | 154 | 0.19 | 7.5 | 524 | 1,370 |
| 9/10/2019 | Assessment | 3.21 | 198 | 167 | 0.27 | 7.7 | 465 | 1,350 |
| 3/10/2020 | Assessment | -- | -- | -- | 0.24 | 6.9 | -- | -- |
| 5/20/2020 | Assessment | 3.55 | 190 | 172 | 0.23 | 7.0 | 407 | 1,230 |
| 10/8/2020 | Assessment | 3.26 | 187 | 148 | 0.24 | 7.0 | 371 | 1,180 |

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-1607S
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 11/2/2016 | Background | 0.46 | 1.86 | 56.7 | 0.01 J | 0.06 | 0.8 | 2.59 | 2.504 | 0.32 | 1.40 | 0.098 | 0.003 J | 50.4 | 7.1 | 0.060 |
| 12/21/2016 | Background | 0.84 | 11.2 | 114 | 0.123 | 0.22 | 3.10 | 20.1 | 2.81 | 0.33 | 11.0 | 0.088 | 0.012 | 45.7 | 9.4 | 0.150 |
| 2/21/2017 | Background | 0.42 | 1.19 | 63.9 | 0.007 J | 0.03 | 0.325 | 1.21 | 1.974 | 0.29 | 0.267 | 0.091 | < 0.002 U | 41.3 | 9.0 | 0.069 |
| 3/28/2017 | Background | 0.43 | 1.17 | 66.8 | < 0.005 U | 0.02 | 0.390 | 0.942 | 1.153 | 0.28 | 0.134 | 0.110 | < 0.002 U | 39.2 | 9.2 | 0.052 |
| 4/18/2017 | Background | 0.55 | 1.62 | 67.6 | 0.01 J | 0.06 | 0.514 | 2.60 | 1.632 | 0.30 | 1.25 | 0.102 | 0.003 J | 45.1 | 8.9 | 0.058 |
| 5/16/2017 | Background | 0.50 | 1.17 | 63.7 | < 0.004 U | 0.03 | 0.226 | 0.851 | 2.408 | 0.29 | 0.159 | 0.094 | < 0.002 U | 48.1 | 9.1 | 0.05 J |
| 6/14/2017 | Background | 0.48 | 1.10 | 62.9 | < 0.004 U | 0.03 | 0.200 | 0.936 | 1.017 | 0.27 | 0.138 | 0.106 | < 0.002 U | 46.1 | 9.4 | 0.05 J |
| 5/10/2018 | Assessment | 0.44 | 0.93 | 71.1 | < 0.004 U | 0.04 | 0.121 | 1.18 | 1.29 | 0.29 | 0.128 | 0.103 | < 0.002 U | 43.2 | 11.4 | 0.064 |
| 9/20/2018 | Assessment | 0.42 | 0.90 | 80.6 | < 0.004 U | 0.04 | 0.086 | 0.840 | 0.584 | 0.28 | 0.094 | 0.118 | < 0.002 U | 41.5 | 8.8 | 0.089 |
| 4/8/2019 | Assessment | 0.40 | 0.94 | 72.7 | < 0.02 U | 0.04 J | 0.376 | 1.21 | 0.723 | 0.26 | 0.09 J | 0.141 | < 0.002 U | 37.9 | 7.0 | < 0.1 U |
| 6/19/2019 | Assessment | 0.44 | 0.96 | 81.0 | < 0.02 U | 0.04 J | 0.428 | 0.990 | 1.121 | 0.19 | 0.108 | 0.075 | < 0.002 U | 34.6 | 5.6 | < 0.1 U |
| 9/10/2019 | Assessment | 0.41 | 0.87 | 67.7 | < 0.02 U | 0.05 J | 0.357 | 0.971 | 2.765 | 0.27 | 0.09 J | 0.0990 | < 0.002 U | 35.0 | 4.3 | < 0.1 U |
| 3/10/2020 | Assessment | 0.41 | 0.92 | 69.2 | < 0.02 U | 0.04 J | 0.321 | 1.23 | 1.171 | 0.24 | 0.06 J | 0.110 | < 0.002 U | 35.5 | 4.5 | < 0.1 U |
| 5/20/2020 | Assessment | 0.45 | 0.93 | 66.8 | -- | 0.04 J | 0.249 | 1.42 | 0.3123 | 0.23 | 0.06 J | 0.105 | -- | 35.8 | 5.7 | < 0.1 U |
| 10/8/2020 | Assessment | 0.48 | 0.89 | 64.0 | -- | 0.03 J | 0.509 | 1.27 | 1.553 | 0.24 | 0.2 J | 0.0937 | < 0.002 U | 35.9 | 3.3 | < 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-1608
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/27/2016 | Background | 0.150 | 93.8 | 6.55 | 0.27 | 7.4 | 70.6 | 368 |
| 11/1/2016 | Background | 0.113 | 86.2 | 6.43 | 0.30 | 7.3 | 64.3 | 352 |
| 12/19/2016 | Background | 0.118 | 83.0 | 4.25 | 0.26 | 7.3 | 58.3 | 338 |
| 2/22/2017 | Background | 0.156 | 83.3 | 4.37 | 0.25 | 7.1 | 94.4 | 398 |
| 3/27/2017 | Background | 0.238 | 80.3 | 5.27 | 0.24 | 6.8 | 112 | 350 |
| 4/17/2017 | Background | 0.233 | 101 | 7.08 | 0.23 | 7.0 | 168 | 424 |
| 5/15/2017 | Background | 0.200 | 102 | 8.62 | 0.23 | 7.8 | 208 | 475 |
| 6/12/2017 | Background | 0.169 | 110 | 8.23 | 0.21 | 6.7 | 204 | 486 |
| 10/31/2017 | Detection | 0.140 | 94.7 | 5.13 | 0.22 | 7.1 | 131 | 430 |
| 5/10/2018 | Assessment | -- | -- | -- | 0.18 | 6.8 | -- | -- |
| 9/20/2018 | Assessment | 0.169 | 128 | 6.59 | 0.21 | 7.2 | 256 | 572 |
| 4/9/2019 | Assessment | 0.156 | 102 | 6.82 | 0.20 | 6.9 | 179 | 451 |
| 6/18/2019 | Assessment | 0.116 | 86.5 | 5.06 | 0.16 | 6.2 | 144 | 416 |
| 9/10/2019 | Assessment | 0.124 | 92.0 | 4.01 | 0.20 | 7.1 | 109 | 369 |
| 3/10/2020 | Assessment | -- | -- | -- | 0.21 | 6.7 | -- | -- |
| 5/13/2020 | Assessment | 0.108 | 92.7 | 5.22 | 0.22 | 6.8 | 158 | 440 |
| 10/6/2020 | Assessment | 0.074 | 83.9 | 1.57 | 0.27 | 6.7 | 56.4 | 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-1608
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/27/2016 | Background | 0.10 | 0.82 | 42.0 | 0.02 J | 0.03 | 0.9 | 1.21 | 0.454 | 0.27 | 0.881 | 0.003 | < 0.002 U | 2.35 | 1.2 | 0.03 J |
| 11/1/2016 | Background | 0.04 J | 0.53 | 33.4 | < 0.005 U | 0.02 J | 0.6 | 0.254 | 2.282 | 0.30 | 0.232 | 0.004 | < 0.002 U | 2.16 | 1.3 | 0.081 |
| 12/19/2016 | Background | 0.04 J | 0.68 | 32.2 | 0.009 J | 0.02 | 2.78 | 0.588 | 0.379 | 0.26 | 0.405 | < 0.0002 U | < 0.002 U | 1.94 | 1.1 | 0.03 J |
| 2/22/2017 | Background | 0.03 J | 0.52 | 32.4 | < 0.005 U | 0.01 J | 0.364 | 0.240 | 1.235 | 0.25 | 0.205 | 0.003 | < 0.002 U | 1.40 | 1.5 | 0.053 |
| 3/27/2017 | Background | 0.03 J | 0.56 | 31.4 | < 0.005 U | 0.01 J | 0.335 | 0.330 | 0.417 | 0.24 | 0.274 | 0.006 | < 0.002 U | 2.49 | 1.3 | 0.04 J |
| 4/17/2017 | Background | 0.04 J | 0.50 | 35.3 | < 0.004 U | 0.01 J | 0.223 | 0.196 | 0.1298 | 0.23 | 0.173 | 0.006 | 0.002 J | 1.89 | 1.3 | 0.01 J |
| 5/15/2017 | Background | 0.04 J | 0.49 | 35.1 | < 0.004 U | 0.008 J | 0.151 | 0.098 | 0.857 | 0.23 | 0.073 | 0.006 | < 0.002 U | 2.08 | 1.0 | 0.01 J |
| 6/12/2017 | Background | 0.03 J | 0.49 | 36.4 | < 0.004 U | 0.006 J | 0.277 | 0.040 | 0.146 | 0.21 | 0.024 | 0.016 | < 0.002 U | 1.57 | 1.1 | 0.02 J |
| 5/10/2018 | Assessment | 0.02 J | 0.37 | 46.6 | 0.009 J | 0.01 J | 0.126 | 0.095 | 0.565 | 0.18 | 0.079 | 0.0003 J | < 0.002 U | 0.53 | 0.9 | 0.02 J |
| 9/20/2018 | Assessment | 0.03 J | 0.42 | 42.6 | < 0.004 U | 0.008 J | 0.264 | 0.052 | 0.55 | 0.21 | 0.037 | 0.004 | < 0.002 U | 1.18 | 1.2 | 0.02 J |
| 4/9/2019 | Assessment | 0.04 J | 0.56 | 41.2 | < 0.02 U | 0.02 J | 0.372 | 0.597 | 0.2435 | 0.20 | 0.454 | 0.01 J | < 0.002 U | 1 J | 1.2 | < 0.1 U |
| 6/18/2019 | Assessment | 0.03 J | 0.40 | 32.0 | < 0.02 U | 0.01 J | 0.306 | 0.05 J | 0.104 | 0.16 | 0.06 J | < 0.009 U | < 0.002 U | 0.8 J | 0.8 | < 0.1 U |
| 9/10/2019 | Assessment | 0.03 J | 0.52 | 26.8 | 0.05 J | < 0.01 U | 0.327 | 0.056 | 1.348 | 0.20 | 0.06 J | 0.00286 | < 0.002 U | 1 J | 1.0 | < 0.1 U |
| 3/10/2020 | Assessment | < 0.02 U | 0.37 | 30.5 | < 0.02 U | < 0.01 U | 0.264 | 0.070 | 0.67 | 0.21 | 0.06 J | 0.00229 | < 0.002 U | 0.6 J | 4.3 | < 0.1 U |
| 5/13/2020 | Assessment | 0.04 J | 0.36 | 31.3 | -- | 0.02 J | 0.2 J | 0.092 | 0.569 | 0.22 | 0.275 | 0.00241 | -- | 0.7 J | 2.1 | < 0.1 U |
| 10/6/2020 | Assessment | 0.09 J | 0.66 | 30.5 | -- | 0.05 | 0.707 | 0.659 | 0.0286 | 0.27 | 0.476 | 0.00241 | < 0.002 U | 2 J | 1.7 | < 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-1805
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 4/10/2019 | Assessment | 4.24 | 147 | 146 | 0.36 | 7.8 | 639 | 1,500 |
| 6/19/2019 | Assessment | 6.38 | 280 | 156 | 0.1 J | 7.5 | 894 | 1,860 |
| 9/11/2019 | Assessment | 6.00 | 273 | 167 | 0.24 | 7.4 | 908 | 1,880 |
| 3/10/2020 | Assessment | -- | -- | -- | 0.27 | 7.2 | -- | -- |
| 5/14/2020 | Assessment | 5.74 | 254 | 169 | 0.24 | 7.2 | 923 | 1,800 |
| 10/9/2020 | Assessment | 5.11 | 265 | 131 | 0.19 | 7.2 | 789 | 1,660 |

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-1805
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 4/10/2019 | Assessment | 2.14 | 20.3 | 54.3 | < 0.1 U | < 0.05 U | 1.00 | 3.31 | 3.12 | 0.36 | 1.21 | 0.043 | < 0.002 U | 80.1 | < 0.3 U | < 0.5 U |
| 6/19/2019 | Assessment | < 0.04 U | 66.3 | 42.4 | < 0.04 U | < 0.02 U | 0.2 J | 4.91 | 1.412 | 0.1 J | < 0.04 U | 0.032 | < 0.002 U | 96.2 | 0.1 J | < 0.2 U |
| 9/11/2019 | Assessment | 0.07 J | 70.4 | 41.9 | < 0.02 U | < 0.01 U | 0.415 | 3.39 | 2.7353 | 0.24 | 0.1 J | 0.0426 | < 0.002 U | 78.0 | 0.1 J | < 0.1 U |
| 3/10/2020 | Assessment | 0.02 J | 11.4 | 24.3 | < 0.02 U | < 0.01 U | 0.2 J | 0.091 | 1.409 | 0.27 | < 0.05 U | 0.0316 | < 0.002 U | 10.7 | < 0.03 U | < 0.1 U |
| 5/14/2020 | Assessment | 0.03 J | 56.0 | 41.3 | -- | < 0.01 U | 0.1 J | 0.384 | 0.641 | 0.24 | < 0.05 U | 0.0422 | -- | 42.7 | 0.1 J | < 0.1 U |
| 10/9/2020 | Assessment | < 0.02 U | 80.9 | 32.2 | -- | < 0.01 U | 0.326 | 1.01 | 1.5 | 0.19 | < 0.05 U | 0.0432 | < 0.002 U | 50.0 | 0.05 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-1921
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 4/10/2019 | Assessment | 0.571 | 55.9 | 34.7 | 0.77 | 7.6 | 106 | 452 |
| 6/19/2019 | Assessment | 0.644 | 77.7 | 33.3 | 0.87 | 8.2 | 128 | 435 |
| 9/13/2019 | Assessment | 0.647 | 79.6 | 33.2 | 0.79 | 7.6 | 131 | 438 |
| 3/12/2020 | Assessment | -- | -- | -- | 0.94 | 7.4 | -- | -- |
| 5/18/2020 | Assessment | 0.751 | 88.3 | 35.8 | 0.98 | 7.4 | 153 | 469 |
| 10/6/2020 | Assessment | 0.577 | 77.2 | 38.7 | 0.98 | 7.2 | 127 | 603 |

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-1921
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 4/10/2019 | Assessment | 0.1 J | 3.36 | 68.0 | < 0.1 U | < 0.05 U | 1.13 | 2.64 | 1.678 | 0.77 | 0.944 | 0.075 | 0.002 J | 478 | 0.4 J | < 0.5 U |
| 6/19/2019 | Assessment | 0.10 | 1.19 | 51.2 | < 0.02 U | < 0.01 U | 0.07 J | 0.860 | 0.276 | 0.87 | 0.06 J | 0.074 | < 0.002 U | 502 | 0.2 J | < 0.1 U |
| 9/13/2019 | Assessment | 0.1 J | 1.25 | 50.8 | < 0.02 U | 0.03 J | 0.1 J | 0.692 | 1.228 | 0.79 | 0.08 J | 0.0926 | < 0.002 U | 500 | 0.1 J | < 0.1 U |
| 3/12/2020 | Assessment | 0.08 J | 1.21 | 58.5 | < 0.02 U | < 0.01 U | 0.230 | 0.879 | 3.441 | 0.94 | 0.217 | 0.0995 | < 0.002 U | 461 | 0.1 J | < 0.1 U |
| 5/18/2020 | Assessment | 0.11 | 1.12 | 54.1 | -- | < 0.01 U | 0.2 J | 0.795 | 1.053 | 0.98 | 0.385 | 0.0990 | -- | 472 | 0.1 J | < 0.1 U |
| 10/6/2020 | Assessment | 0.11 | 1.18 | 47.4 | -- | < 0.01 U | 0.524 | 0.604 | 0.451 | 0.98 | 0.2 J | 0.0870 | < 0.002 U | 472 | 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-1922D
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 4/9/2019 | Assessment | 1.00 | 145 | 53.5 | 0.29 | 7.5 | 333 | 908 |
| 6/19/2019 | Assessment | 0.725 | 121 | 44.1 | 0.31 | 7.6 | 269 | 724 |
| 9/11/2019 | Assessment | 0.440 | 96.5 | 32.7 | 0.33 | 7.6 | 167 | 566 |
| 3/11/2020 | Assessment | -- | -- | -- | 0.29 | 6.9 | -- | -- |
| 5/19/2020 | Assessment | 0.310 | 80.0 | 28.3 | 0.32 | 7.0 | 118 | 484 |
| 10/8/2020 | Assessment | 0.131 | 64.5 | 19.5 | 0.30 | 7.1 | 47.3 | 389 |

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-1922D
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 4/9/2019 | Assessment | 0.88 | 323 | 69.3 | < 0.1 U | < 0.05 U | 0.4 J | 1.02 | 2.64 | 0.29 | 0.1 J | 0.02 J | < 0.002 U | 488 | < 0.2 U | < 0.5 U |
| 6/19/2019 | Assessment | 0.29 | 716 | 54.7 | < 0.02 U | < 0.01 U | < 0.04 U | 0.530 | 3.332 | 0.31 | < 0.02 U | < 0.009 U | < 0.002 U | 515 | 0.04 J | < 0.1 U |
| 9/11/2019 | Assessment | 1.04 | 839 | 51.0 | < 0.02 U | 0.01 J | 0.08 J | 0.492 | 3.089 | 0.33 | < 0.05 U | 0.0126 | < 0.002 U | 478 | 0.06 J | < 0.1 U |
| 3/11/2020 | Assessment | 0.63 | 1,240 | 72.3 | < 0.02 U | < 0.01 U | 0.335 | 0.267 | 3.28 | 0.29 | 0.07 J | 0.0117 | < 0.002 U | 314 | 0.05 J | < 0.1 U |
| 5/19/2020 | Assessment | 0.31 | 522 | 66.3 | -- | < 0.01 U | 0.2 J | 0.218 | 1.816 | 0.32 | < 0.05 U | 0.0110 | -- | 289 | < 0.03 U | < 0.1 U |
| 10/8/2020 | Assessment | 4.91 | 1,040 | 144 | -- | < 0.01 U | 0.351 | 0.326 | 2.815 | 0.30 | 0.07 J | 0.00747 | < 0.002 U | 109 | < 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-1922S
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 4/9/2019 | Assessment | 7.66 | 359 | 171 | 0.16 | 7.2 | 978 | 2,090 |
| 6/20/2019 | Assessment | 6.95 | 335 | 169 | 0.17 | 7.4 | 1,020 | 2,090 |
| 9/11/2019 | Assessment | 6.34 | 342 | 179 | 0.19 | 7.3 | 1,070 | 2,060 |
| 3/11/2020 | Assessment | -- | -- | -- | 0.1 J | 6.9 | -- | -- |
| 5/18/2020 | Assessment | 6.92 | 345 | 160 | 0.19 | 6.9 | 1,060 | 1,920 |
| 10/9/2020 | Assessment | 4.09 | 293 | 126 | 0.16 | 7.1 | 842 | 1,750 |

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-1922S
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 4/9/2019 | Assessment | < 0.1 U | 1.95 | 30.7 | < 0.1 U | < 0.05 U | 0.3 J | 1.83 | 2.124 | 0.16 | 0.3 J | 0.082 | < 0.002 U | 43.5 | < 0.2 U | < 0.5 U |
| 6/20/2019 | Assessment | < 0.04 U | 1.89 | 26.9 | < 0.04 U | < 0.02 U | 0.2 J | 1.37 | 1.156 | 0.17 | 0.08 J | 0.03 J | < 0.002 U | 36.4 | 0.07 J | < 0.2 U |
| 9/11/2019 | Assessment | 0.02 J | 1.75 | 26.5 | < 0.02 U | < 0.01 U | 0.2 J | 1.23 | 2.945 | 0.19 | 0.1 J | 0.0556 | < 0.002 U | 33.9 | 0.08 J | < 0.1 U |
| 3/11/2020 | Assessment | < 0.02 U | 2.92 | 28.0 | < 0.04 U | < 0.01 U | 0.220 | 1.31 | 2.028 | 0.1 J | 0.2 J | 0.0615 | < 0.002 U | 32.4 | 0.09 J | < 0.1 U |
| 5/18/2020 | Assessment | < 0.02 U | 1.79 | 27.4 | -- | < 0.01 U | 0.2 J | 1.52 | 0.821 | 0.19 | 0.06 J | 0.0611 | -- | 34.3 | 0.1 J | < 0.1 U |
| 10/9/2020 | Assessment | 0.09 J | 3.25 | 37.7 | -- | 0.11 | 1.48 | 2.88 | 1.844 | 0.16 | 1.57 | 0.0551 | 0.002 J | 30.7 | 0.3 | < 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-1923
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 4/10/2019 | Assessment | 1.09 | 113 | 38.0 | 0.16 | 7.6 | 181 | 584 |
| 6/18/2019 | Assessment | 0.804 | 91.4 | 35.9 | 0.16 | 7.3 | 147 | 526 |
| 9/11/2019 | Assessment | 0.756 | 105 | 38.3 | 0.13 | 6.8 | 159 | 545 |
| 3/12/2020 | Assessment | -- | -- | -- | 0.18 | -- | -- | -- |
| 5/14/2020 | Assessment | 0.770 | 103 | 33.1 | 0.21 | 7.3 | 150 | 525 |
| 10/6/2020 | Assessment | 1.19 | 117 | 34.2 | 0.27 | 7.2 | 253 | 329 |

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-1923
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 4/10/2019 | Assessment | 0.2 J | 0.55 | 77.6 | < 0.1 U | < 0.05 U | 0.3 J | 0.317 | 0.706 | 0.16 | 0.1 J | 0.223 | < 0.002 U | 160 | 23.8 | < 0.5 U |
| 6/18/2019 | Assessment | 0.21 | 0.56 | 72.9 | < 0.02 U | 0.01 J | 0.353 | 0.657 | 0.836 | 0.16 | 0.255 | 0.135 | < 0.002 U | 101 | 14.4 | < 0.1 U |
| 9/11/2019 | Assessment | 0.24 | 0.75 | 86.6 | < 0.02 U | 0.03 J | 0.541 | 1.01 | 2.099 | 0.13 | 0.543 | 0.137 | < 0.002 U | 84.2 | 14.0 | < 0.1 U |
| 3/12/2020 | Assessment | 0.15 | 0.58 | 73.3 | < 0.02 U | 0.02 J | 0.903 | 0.622 | 0.935 | 0.18 | 0.302 | 0.115 | < 0.002 U | 70.1 | 5.2 | < 0.1 U |
| 5/14/2020 | Assessment | 0.23 | 0.69 | 79.8 | -- | 0.02 J | 0.484 | 0.814 | 0.48 | 0.21 | 0.354 | 0.109 | -- | 70.9 | 4.1 | < 0.1 U |
| 10/6/2020 | Assessment | 0.18 | 0.62 | 86.4 | -- | 0.01 J | 2.13 | 0.747 | 1.241 | 0.27 | 0.434 | 0.177 | < 0.002 U | 98.0 | 17.8 | < 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-1924
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 4/10/2019 | Assessment | 7.49 | 286 | 136 | 0.42 | 6.9 | 766 | 1,700 |
| 6/18/2019 | Assessment | 6.22 | 243 | 122 | 0.38 | 7.3 | 721 | 1,570 |
| 9/11/2019 | Assessment | 4.89 | 238 | 109 | 0.44 | 7.1 | 662 | 1,500 |
| 3/12/2020 | Assessment | -- | -- | -- | 0.44 | 7.1 | -- | -- |
| 5/14/2020 | Assessment | 5.28 | 314 | 145 | 0.47 | 7.0 | 817 | 1,730 |
| 10/6/2020 | Assessment | 5.27 | 301 | 159 | 0.40 | 7.1 | 851 | 1,840 |

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-1924
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 4/10/2019 | Assessment | 0.2 J | 0.91 | 59.8 | < 0.1 U | 0.2 J | 0.3 J | 2.29 | 0.921 | 0.42 | 0.3 J | 0.133 | < 0.002 U | 89.5 | 1.3 | < 0.5 U |
| 6/18/2019 | Assessment | 0.06 J | 0.55 | 69.5 | < 0.02 U | 0.05 | 0.1 J | 2.74 | 1.417 | 0.38 | 0.07 J | 0.087 | < 0.002 U | 69.0 | 3.6 | < 0.1 U |
| 9/11/2019 | Assessment | 0.07 J | 0.61 | 54.5 | < 0.02 U | 0.06 | 0.2 J | 4.10 | 1.719 | 0.44 | 0.218 | 0.102 | < 0.002 U | 76.7 | 3.5 | < 0.1 U |
| 3/12/2020 | Assessment | 0.09 J | 0.72 | 46.7 | < 0.1 U | 0.06 | 0.324 | 6.80 | 0.974 | 0.44 | 0.394 | 0.130 | < 0.002 U | 92.0 | 1.1 | < 0.1 U |
| 5/14/2020 | Assessment | 0.06 J | 0.66 | 54.5 | -- | 0.06 | 0.784 | 3.10 | 1.785 | 0.47 | 0.229 | 0.104 | -- | 77.6 | 1.1 | < 0.1 U |
| 10/6/2020 | Assessment | 0.09 J | 1.30 | 55.3 | -- | 0.09 | 1.64 | 10.3 | 1.013 | 0.40 | 1.14 | 0.113 | 0.003 J | 82.7 | 0.9 | < 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-1925
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 4/10/2019 | Assessment | 4.17 | 172 | 128 | 0.33 | 7.2 | 624 | 1,460 |
| 6/19/2019 | Assessment | 5.21 | 242 | 147 | 0.25 | 7.6 | 686 | 1,520 |
| 9/10/2019 | Assessment | 5.86 | 249 | 147 | 0.26 | 7.2 | 683 | 1,500 |
| 3/11/2020 | Assessment | -- | -- | -- | 0.24 | 7.0 | -- | -- |
| 5/14/2020 | Assessment | 4.91 | 205 | 119 | 0.34 | 7.0 | 565 | 1,250 |
| 10/6/2020 | Assessment | 4.31 | 211 | 122 | 0.29 | 6.8 | 548 | 372 |

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-1925
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 4/10/2019 | Assessment | 0.2 J | 0.88 | 46.6 | < 0.1 U | 0.06 J | 0.4 J | 1.65 | 2.726 | 0.33 | 0.4 J | 0.094 | < 0.002 U | 76.0 | 6.2 | < 0.5 U |
| 6/19/2019 | Assessment | 0.18 | 0.35 | 48.0 | < 0.02 U | 0.04 J | 0.1 J | 1.28 | 1.245 | 0.25 | 0.04 J | 0.095 | < 0.002 U | 63.5 | 6.3 | < 0.1 U |
| 9/10/2019 | Assessment | 0.20 | 0.41 | 45.0 | < 0.02 U | 0.06 | 0.1 J | 1.27 | 1.041 | 0.26 | 0.2 J | 0.0947 | < 0.002 U | 54.6 | 4.1 | < 0.1 U |
| 3/11/2020 | Assessment | 0.16 | 0.37 | 40.4 | < 0.02 U | 0.05 J | 0.1 J | 1.21 | 1.59 | 0.24 | < 0.05 U | 0.0926 | < 0.002 U | 56.2 | 2.9 | < 0.1 U |
| 5/14/2020 | Assessment | 0.19 | 0.32 | 36.8 | -- | 0.04 J | 0.08 J | 1.07 | 0.91 | 0.34 | < 0.05 U | 0.0853 | -- | 57.9 | 4.8 | < 0.1 U |
| 10/6/2020 | Assessment | 0.20 | 0.56 | 39.5 | -- | 0.04 J | 0.428 | 1.07 | 0.2096 | 0.29 | 0.09 J | 0.0776 | < 0.002 U | 45.8 | 5.4 | < 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-1926
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 4/10/2019 | Assessment | 0.263 | 95.4 | 57.8 | 0.25 | 7.2 | 67.4 | 506 |
| 6/20/2019 | Assessment | 0.165 | 82.1 | 23.2 | 0.28 | 7.3 | 47.8 | 416 |
| 9/13/2019 | Assessment | 0.145 | 87.6 | 8.57 | 0.24 | 7.3 | 26.4 | 396 |
| 3/12/2020 | Assessment | -- | -- | -- | 0.28 | 7.0 | -- | -- |
| 5/18/2020 | Assessment | 0.146 | 95.3 | 7.86 | 0.29 | 7.0 | 28.5 | 354 |
| 10/8/2020 | Assessment | 0.121 | 87.2 | 3.49 | 0.26 | 7.0 | 30.0 | 351 |

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-1926
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 4/10/2019 | Assessment | 0.1 J | 0.95 | 28.8 | < 0.1 U | 0.06 J | 0.4 J | 5.05 | 1.327 | 0.25 | 0.981 | 0.01 J | < 0.002 U | 9 J | 0.3 J | < 0.5 U |
| 6/20/2019 | Assessment | 0.08 J | 0.38 | 22.9 | < 0.02 U | 0.05 | 0.06 J | 1.81 | 0.524 | 0.28 | 0.05 J | < 0.009 U | < 0.002 U | 7.05 | 0.3 | < 0.1 U |
| 9/13/2019 | Assessment | 0.07 J | 0.37 | 23.9 | < 0.02 U | 0.06 | 0.09 J | 1.17 | 0.4608 | 0.24 | 0.07 J | 0.00624 | < 0.002 U | 5.38 | 0.4 | < 0.1 U |
| 3/12/2020 | Assessment | 0.03 J | 0.33 | 20.3 | < 0.02 U | 0.04 J | 0.206 | 1.08 | 1.316 | 0.28 | < 0.05 U | 0.00675 | < 0.002 U | 6.16 | 0.2 | < 0.1 U |
| 5/18/2020 | Assessment | 0.08 J | 0.36 | 23.7 | -- | 0.05 | 0.2 J | 1.42 | 0.3552 | 0.29 | < 0.05 U | 0.00744 | -- | 5.72 | 0.3 | < 0.1 U |
| 10/8/2020 | Assessment | 0.05 J | 0.32 | 20.0 | -- | 0.05 J | 0.323 | 1.03 | 0.379 | 0.26 | < 0.05 U | 0.00575 | < 0.002 U | 5.04 | 1.0 | < 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-1927
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 4/10/2019 | Assessment | 0.654 | 151 | 20.3 | 0.18 | 7.3 | 327 | 898 |
| 6/20/2019 | Assessment | 0.513 | 159 | 15.6 | 0.13 | 7.8 | 335 | 849 |
| 9/13/2019 | Assessment | 0.498 | 143 | 15.2 | 0.14 | 7.0 | 306 | 839 |
| 3/11/2020 | Assessment | -- | -- | -- | 0.14 | 6.9 | -- | -- |
| 5/14/2020 | Assessment | 0.501 | 143 | 12.9 | 0.17 | 6.8 | 290 | 807 |
| 10/9/2020 | Assessment | 0.429 | 155 | 11.8 | 0.14 | 6.9 | 277 | 741 |

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-1927
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 4/10/2019 | Assessment | 0.3 J | 0.4 J | 63.4 | < 0.1 U | < 0.05 U | < 0.2 U | 0.319 | 1.533 | 0.18 | 0.1 J | 0.03 J | < 0.002 U | 7 J | 0.8 J | < 0.5 U |
| 6/20/2019 | Assessment | 0.15 | 0.28 | 61.5 | < 0.02 U | 0.05 J | 0.1 J | 0.251 | 0.866 | 0.13 | 0.03 J | < 0.009 U | < 0.002 U | 2.82 | 0.3 | < 0.1 U |
| 9/13/2019 | Assessment | 0.12 | 0.27 | 58.7 | < 0.02 U | 0.05 | 0.08 J | 0.225 | 1.415 | 0.14 | < 0.05 U | 0.00638 | < 0.002 U | 2 J | 0.4 | < 0.1 U |
| 3/11/2020 | Assessment | 0.09 J | 0.29 | 56.2 | < 0.02 U | 0.06 | 0.1 J | 0.319 | 0.765 | 0.14 | < 0.05 U | 0.00723 | < 0.002 U | 2 J | 0.2 J | < 0.1 U |
| 5/14/2020 | Assessment | 0.14 | 0.29 | 54.4 | -- | 0.06 | 0.1 J | 0.434 | 1.19 | 0.17 | 0.08 J | 0.00725 | -- | 2 J | 0.1 J | < 0.1 U |
| 10/9/2020 | Assessment | 0.12 | 0.44 | 51.3 | -- | 0.07 | 0.763 | 0.602 | 1.371 | 0.14 | 0.441 | 0.00598 | < 0.002 U | 2 J | 0.3 | < 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-1929
Mountaineer - BAP
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 4/10/2019 | Assessment | 0.243 | 115 | 11.7 | 0.19 | 7.5 | 214 | 574 |
| 6/18/2019 | Assessment | 0.219 | 97.8 | 13.6 | 0.20 | 7.5 | 237 | 541 |
| 9/10/2019 | Assessment | 0.236 | 113 | 15.1 | 0.19 | 7.6 | 234 | 528 |
| 3/10/2020 | Assessment | -- | -- | -- | 0.23 | 7.2 | -- | -- |
| 5/13/2020 | Assessment | 0.189 | 98.0 | 10.7 | 0.23 | 7.2 | 176 | 461 |
| 10/9/2020 | Assessment | 0.218 | 104 | 10.7 | 0.22 | 7.2 | 198 | 508 |

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-1929
Mountaineer - 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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 4/10/2019 | Assessment | < 0.1 U | 0.80 | 56.9 | < 0.1 U | < 0.05 U | 0.5 J | 3.03 | 0.823 | 0.19 | 1.15 | 0.01 J | < 0.002 U | < 2 U | 1.3 | < 0.5 U |
| 6/18/2019 | Assessment | 0.02 J | 0.37 | 47.6 | < 0.02 U | 0.02 J | 0.2 J | 0.157 | 0.398 | 0.20 | 0.08 J | < 0.009 U | < 0.002 U | 0.7 J | 1.3 | < 0.1 U |
| 9/10/2019 | Assessment | 0.03 J | 0.47 | 52.1 | < 0.02 U | 0.01 J | 0.280 | 0.606 | 2.994 | 0.19 | 0.274 | 0.00480 | < 0.002 U | 0.7 J | 1.7 | < 0.1 U |
| 3/10/2020 | Assessment | < 0.02 U | 0.41 | 43.8 | < 0.02 U | < 0.01 U | 0.529 | 0.214 | 0.478 | 0.23 | 0.1 J | 0.00382 | < 0.002 U | 0.5 J | 0.9 | < 0.1 U |
| 5/13/2020 | Assessment | 0.04 J | 0.79 | 52.1 | -- | 0.04 J | 0.584 | 1.81 | 0.88 | 0.23 | 0.870 | 0.00416 | -- | 0.6 J | 1.1 | < 0.1 U |
| 10/9/2020 | Assessment | 0.02 J | 0.41 | 44.6 | -- | 0.01 J | 0.416 | 0.363 | 0.988 | 0.22 | 0.2 J | 0.00430 | < 0.002 U | 0.6 J | 1.8 | < 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 2: Residence Time Calculation Summary - Bottom Ash Pond
Mountaineer Bottom Ash Pond

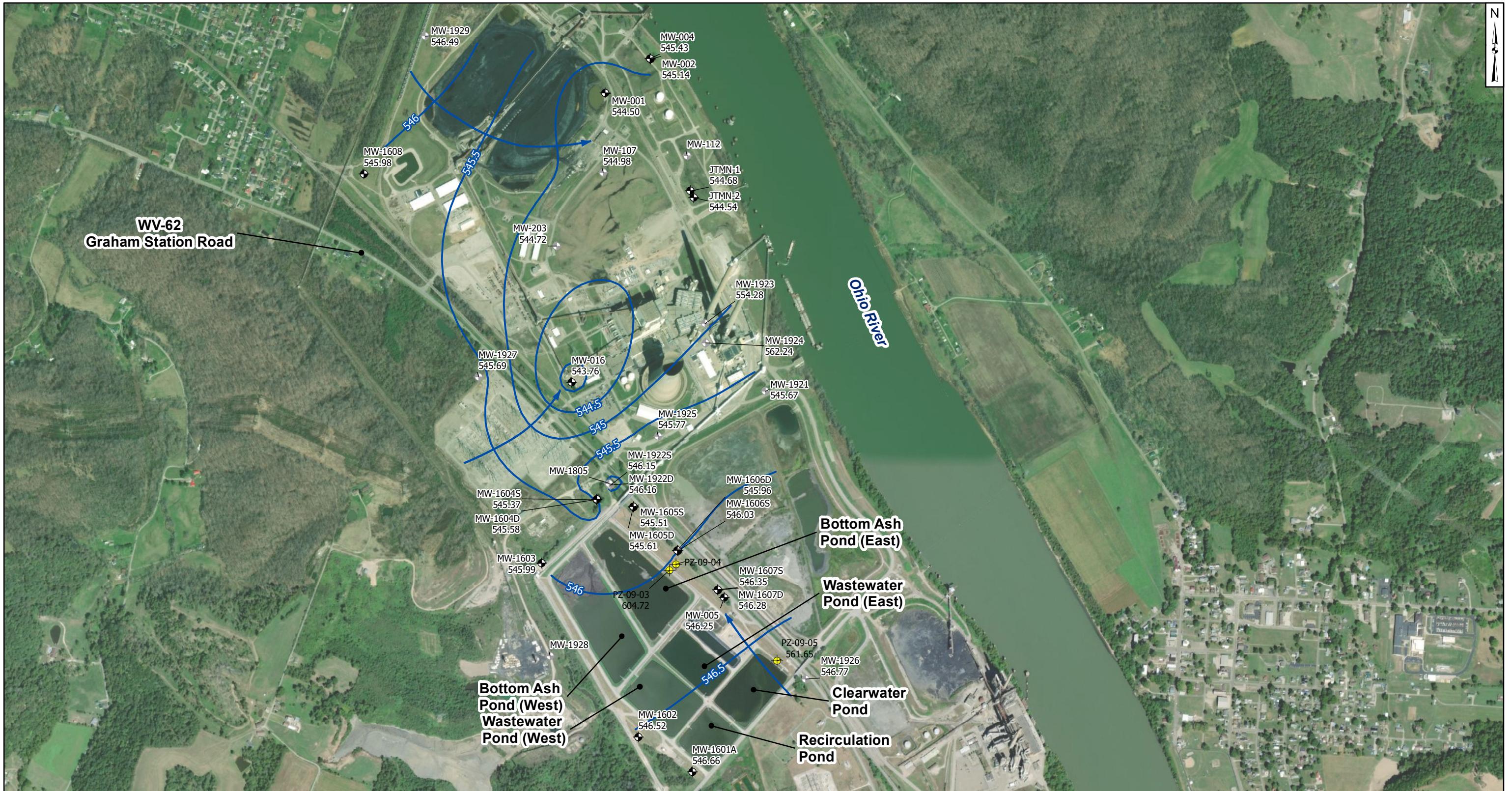
Geosyntec Consultants, Inc.

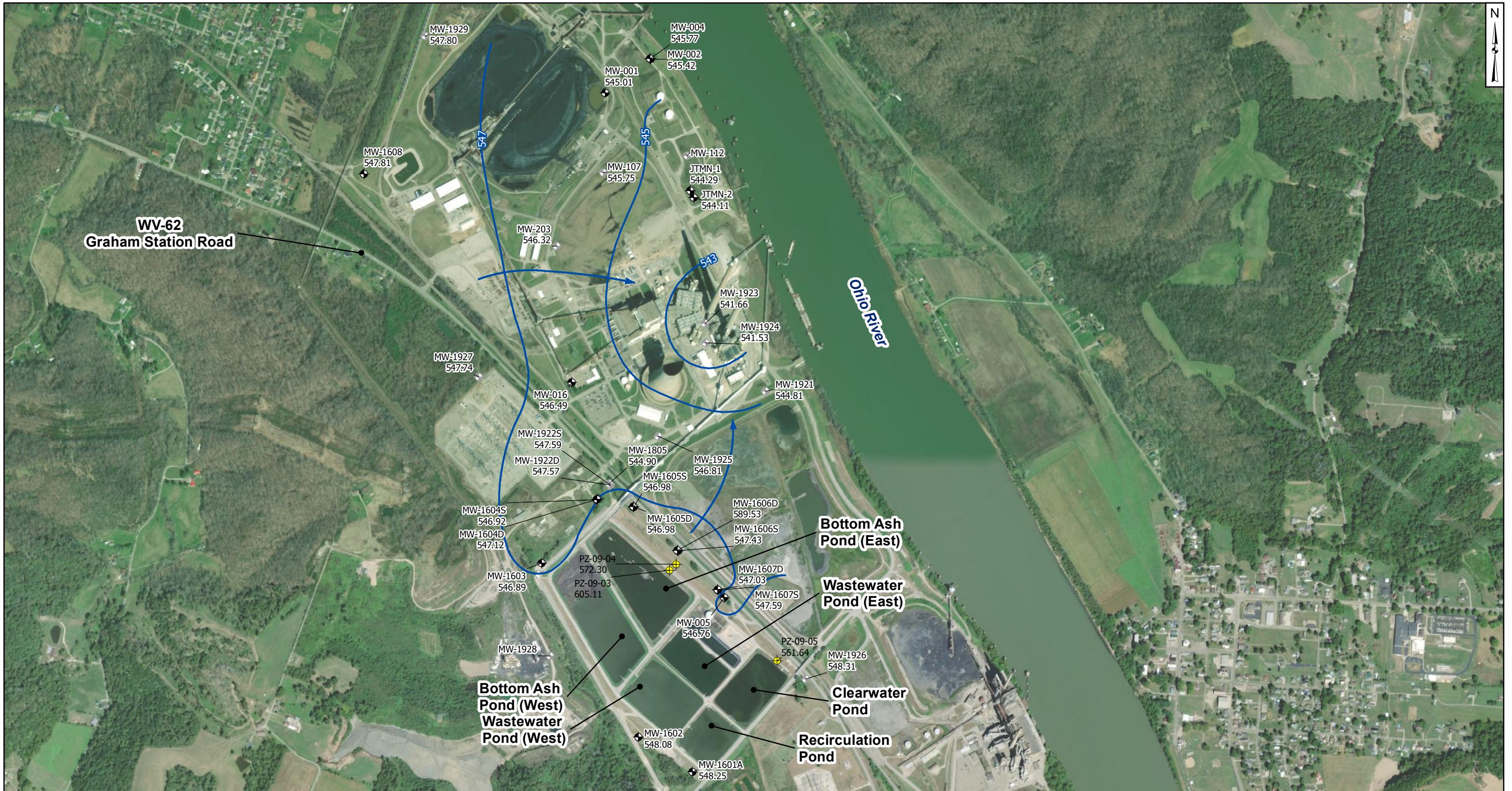
| CCR Management Unit | Monitoring Well | Well Diameter (inches) | 2020-03 | | 2020-05 | | 2020-10 | |
|---------------------|-------------------------|------------------------|--------------------------------|-----------------------------------|--------------------------------|-----------------------------------|--------------------------------|-----------------------------------|
| | | | 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-1601A ^[1] | 2.0 | 74 | 0.8 | 167 | 0.4 | 63 | 1.0 |
| | MW-1602 ^[1] | 2.0 | 77 | 0.8 | 155 | 0.4 | 112 | 0.5 |
| | MW-1603 ^[1] | 2.0 | 179 | 0.3 | 197 | 0.3 | 556 | 0.1 |
| | MW-1604D ^[2] | 2.0 | 93 | 0.7 | 366 | 0.2 | 202 | 0.3 |
| | MW-1604S ^[2] | 2.0 | 140 | 0.4 | 332 | 0.2 | 485 | 0.1 |
| | MW-1605D ^[2] | 2.0 | 69 | 0.9 | 367 | 0.2 | 286 | 0.2 |
| | MW-1605S ^[2] | 2.0 | 166 | 0.4 | 367 | 0.2 | 286 | 0.2 |
| | MW-1606D ^[2] | 2.0 | 97 | 0.6 | 6,660 | 0.01 | 287 | 0.2 |
| | MW-1606S ^[2] | 2.0 | 85 | 0.7 | 226 | 0.3 | 309 | 0.2 |
| | MW-1607D ^[2] | 2.0 | 109 | 0.6 | 245 | 0.2 | 302 | 0.2 |
| | MW-1607S ^[2] | 2.0 | 136 | 0.4 | 313 | 0.2 | 236 | 0.3 |
| | MW-1608 ^[1] | 2.0 | 110 | 0.6 | 145 | 0.4 | 128 | 0.5 |

Notes:

[1] - Background Well

[2] - Downgradient Well





P:\Projects\AEP\Groundwater Statistical Evaluation - CHA8423\Groundwater Mapping\GIS Files\MXD\Mountaineer\2020\AEP-Mountaineer_BAP_GW_2020-05.mxd. ARevezzo. 1/27/2021. CHA8423\07\08.

1,000 500 0 1,000
Feet

Potentiometric Surface Map - Uppermost Aquifer
May 2020

AEP Mountaineer Generating Plant - Bottom Ash Ponds
New Haven, West Virginia

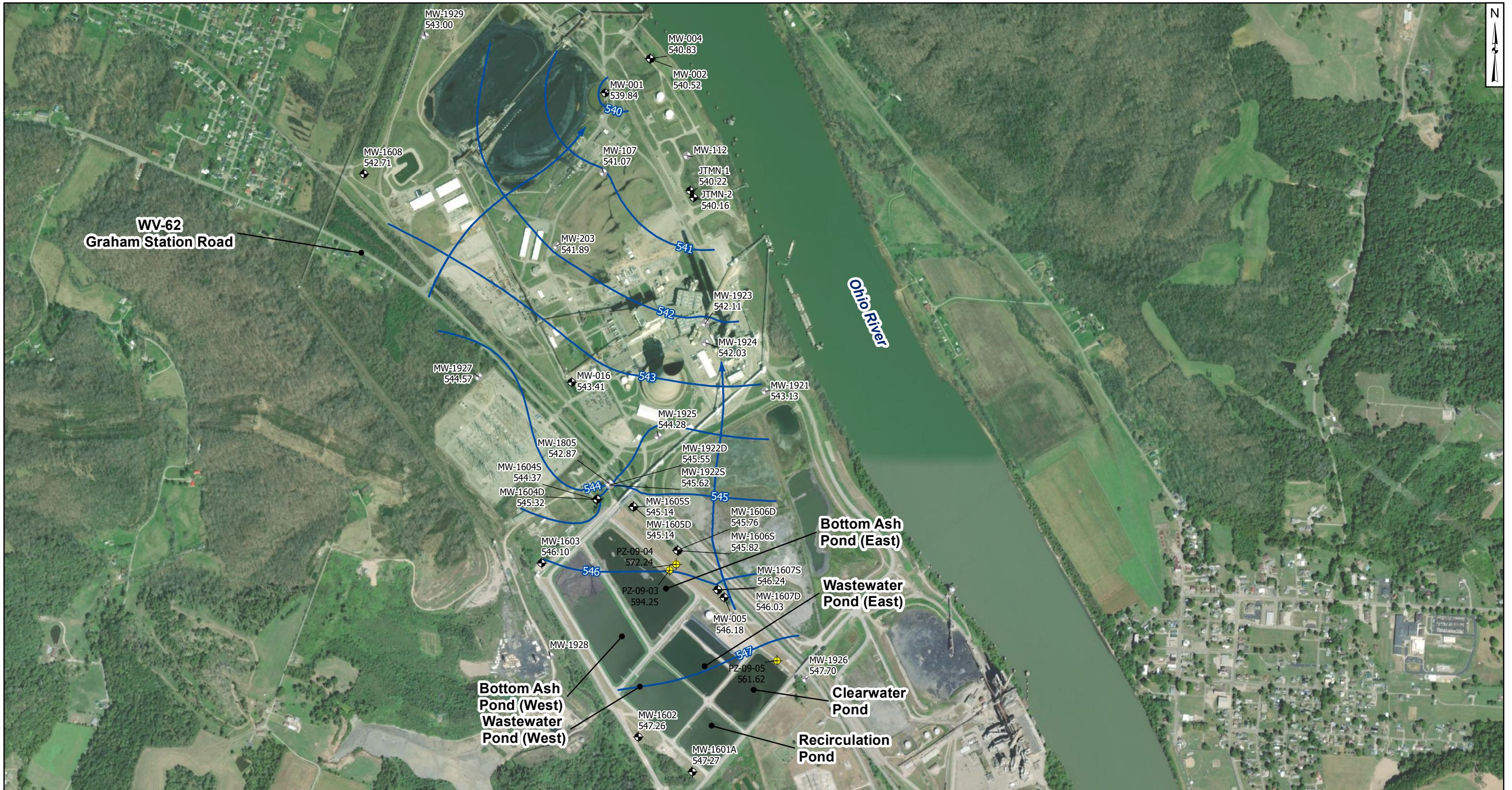
Geosyntec
consultants

Figure

3

Columbus, Ohio

2021/01/27



Legend

- CCR Network Monitoring Wells
- Nature and Extent Monitoring Wells
- Piezometer
- Groundwater Elevation Contour
- Approximate Groundwater Flow Direction

Notes

- Monitoring well coordinates and water level data (collected on October 5, 2020) provided by AEP.
- Site features based on information available in Ash Pond System-CCR Groundwater Monitoring Well Network Evaluation (Arcadis, 2016) provided by AEP.
- Groundwater elevation units are feet above mean sea level.
- Water levels from piezometers were inconsistent with other local data and not used to create groundwater contours.
- MW-1924 was not used in generate groundwater contours due to anomalous or inconsistent reading.
- MW-1805 was not gauged in May 2020. MW-1928 and PZ-09-04 were dry during October 2020.
- Normal lower pool elevation of the Ohio River at Racine Lock and Dam is 539.5 ft amsl (USACE).
- Intermittent usage of pumping wells for plant activities impact water levels in the vicinity. In general, shallow groundwater beneath the plant flows northeast toward the Ohio River.

1,000 500 0 1,000
Feet

Potentiometric Surface Map - Uppermost Aquifer
October 2020

AEP Mountaineer Generating Plant - Bottom Ash Ponds
New Haven, West Virginia

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Figure

4

Appendix 2

The groundwater data statistical analyses completed in 2020 follow.

STATISTICAL ANALYSIS SUMMARY

BOTTOM ASH POND

Mountaineer Plant

New Haven, West Virginia

Submitted to



1 Riverside Plaza
Columbus, Ohio 43215-2372

Submitted by



engineers | scientists | innovators

941 Chatham Lane
Suite 103
Columbus, Ohio 43221

October 2, 2020

CHA8500

TABLE OF CONTENTS

| | |
|---|-----|
| SECTION 1 Executive Summary | 1 |
| SECTION 2 Bottom Ash Pond Evaluation..... | 2-1 |
| 2.1 Data Validation & QA/QC | 2-1 |
| 2.2 Statistical Analysis..... | 2-1 |
| 2.2.1 Establishment of GWPSSs..... | 2-1 |
| 2.2.2 Evaluation of Potential Appendix IV SSLs..... | 2-2 |
| 2.2.3 Evaluation of Potential Appendix III SSIs | 2-2 |
| 2.3 Conclusions..... | 2-3 |
| SECTION 3 References | 3-1 |

LIST OF TABLES

| | |
|---------|----------------------------------|
| Table 1 | Groundwater Data Summary |
| Table 2 | Groundwater Protection Standards |
| Table 3 | Appendix III Data Summary |

LIST OF ATTACHMENTS

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

LIST OF ACRONYMS AND ABBREVIATIONS

| | |
|-------|---|
| AEP | American Electric Power |
| 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 |
| 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 Mountaineer Power Plant located in New Haven, West Virginia.

Based on detection monitoring conducted in 2017 and 2018, statistically significant increases (SSIs) over background were concluded for boron, calcium, chloride, total dissolved solids (TDS), and sulfate at the BAP. An alternative source was not identified at the time, so the BAP initiated assessment monitoring in April 2018. Groundwater protection standards (GWPS) were set in accordance with 40 CFR 257.95(d)(2) and a statistical evaluation of the assessment monitoring data was conducted. Statistically significant levels were observed for lithium (Geosyntec, 2019). An alternative source was not identified, so the BAP initiated an assessment of corrective measures in accordance with 40 CFR 257.96 and has been completing assessment monitoring since. Two assessment monitoring events were conducted at the BAP in March and May 2020 in accordance with 40 CFR 257.95. The results of these assessment events are documented in this report.

Groundwater data underwent several validation tests, including those for completeness, sample tracking accuracy, transcription errors, and consistent use of measurement units. No data quality issues were identified which would impact data usability.

The monitoring data were submitted to Groundwater Stats Consulting, LLC for statistical analysis. 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 Appendix IV parameters were present at a statistically significant level (SSL) above the GWPS. SSLs were identified for lithium. Thus, the unit will continue the assessment of corrective measures process and will monitor the groundwater monitoring network in accordance with the assessment monitoring program as required by 40 CFR 275.96(b). 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 March 2020 event were analyzed for Appendix IV parameters only, whereas samples from the May 2020 sample event were analyzed for all Appendix III and detected Appendix IV parameters based on the results of the March event. 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.9.6.26 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. No outliers were identified for these events.

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. Tolerance limits were calculated parametrically with 95% coverage and 95% confidence

for arsenic, chromium, cobalt, combined radium, fluoride, lithium, and molybdenum. Non-parametric tolerance limits were calculated for antimony, barium, cadmium, lead, selenium, and thallium due to apparent non-normal distributions and for beryllium and mercury due to a high non-detect frequency. Tolerance limits and the final GWPSs are summarized in Table 2.

2.2.2 Evaluation of Potential Appendix IV SSLs

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

The following SSLs were identified at the Mountaineer BAP:

- The LCL for lithium exceeded the GWPS of 0.400 mg/L at MW-1605D (0.0777 mg/L), MW-1605S (0.0753 mg/L), MW-1606D (0.123 mg/L), MW-1606S (0.114 mg/L), MW-1607D (0.101 mg/L), and MW-1607S (0.112 mg/L).

As a result, the Mountaineer BAP will continue the assessment of corrective measures and continue to monitor the groundwater monitoring network in accordance with the assessment monitoring program per 40 CFR 257.96(b).

2.2.3 Evaluation of Potential Appendix III SSIs

While SSLs were identified, a review of the Appendix III results were also completed to assess whether concentrations of Appendix III parameters at the compliance wells exceeded background concentrations.

Data collected during the May 2020 assessment monitoring event from each compliance well were compared to the prediction limits to evaluate results above background values. The results from this event and the prediction limits are summarized in Table 2. The following exceedances of the upper prediction limits (UPLs) were noted:

- Boron concentrations exceeded the interwell UPL of 0.614 mg/L at MW-1604D (4.65 mg/L), MW-1604S (3.68 mg/L), MW-1605D (6.92 mg/L), MW-1605S (4.83 mg/L), MW-1606D (5.92 mg/L), MW-1606S (5.94 mg/L), MW-1607D (3.89 mg/L), and MW-1607S (3.55 mg/L).
- Calcium concentrations exceeded the interwell UPL of 200 mg/L at MW-1604D (205 mg/L), MW-1604S (250 mg/L), MW-1605D (265 mg/L), MW-1606D (270 mg/L), MW-1606S (207 mg/L), and MW-1607D (228 mg/L).

- Chloride concentrations exceeded the interwell UPL of 68.5 mg/L at MW-1604D (113 mg/L), MW-1604S (116 mg/L), MW-1605D (169 mg/L), MW-1605S (93.5 mg/L), MW-1606D (178 mg/L), MW-1606S (181 mg/L), MW-1607D (181 mg/L), and MW-1607S (172 mg/L).
- Fluoride concentrations exceeded the interwell UPL of 0.271 mg/L at MW-1605S (0.28 mg/L), MW-1606S (0.38 mg/L), and MW-1607D (0.51 mg/L).
- Sulfate concentrations exceeded the interwell UPL of 674 mg/L at MW-1604S (715 mg/L), MW-1605D (848 mg/L), MW-1606D (756 mg/L), and MW-1607D (722 mg/L).
- The pH value at MW-1607S (7.0 SU) was below the intrawell lower prediction limit (LPL) of 7.2 SU.
- TDS concentrations exceeded the interwell UPL of 1040 mg/L at MW-1604D (1390 mg/L), MW-1604S (1520 mg/L), MW-1605D (1670 mg/L), MW-1605S (1160 mg/L), MW-1606D (1600 mg/L), MW-1606S (1400 mg/L), MW-1607D (1620 mg/L), and MW-1607S (1230 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 these results, concentrations of Appendix III constituents appear to be above background levels at compliance wells.

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 March and 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 GWPS. SSLs were identified for lithium. Appendix III parameters were compared to established prediction limits, with exceedances identified for boron, calcium, chloride, fluoride, pH sulfate, and TDS.

Based on this evaluation, the Mountaineer BAP CCR unit will continue with the assessment of corrective measures and continue to monitor the groundwater monitoring network in accordance with the assessment monitoring program per 40 CFR 257.96b.

SECTION 3

REFERENCES

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

Geosyntec Consultants (Geosyntec). 2019. Statistical Analysis Summary – Bottom Ash Pond, Mountaineer Plant. January 8, 2019.

TABLES

Table 1 - Groundwater Data Summary
Mountaineer Plant - Bottom Ash Pond

| Parameter | Unit | MW-1601A | | MW-1602 | | MW-1603 | | MW-1604D | | MW-1604S | | MW-1605D | |
|------------------------|-------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| | | 3/12/2020 | 5/15/2020 | 3/11/2020 | 5/15/2020 | 3/11/2020 | 5/15/2020 | 3/10/2020 | 5/14/2020 | 3/10/2020 | 5/14/2020 | 3/10/2020 | 5/19/2020 |
| Antimony | µg/L | 0.1 U | 0.03 J | 0.1 U | 0.02 J | 0.1 U | 0.1 U | 0.02 J | 0.03 J | 0.14 | 0.15 | 0.03 J | 0.04 J |
| Arsenic | µg/L | 0.58 | 0.57 | 0.31 | 0.31 | 0.29 | 0.27 | 0.31 | 0.28 | 0.29 | 0.30 | 3.01 | 2.73 |
| Barium | µg/L | 64.9 | 67.8 | 28.9 | 30.0 | 30.4 | 30.0 | 34.2 | 34.1 | 28.9 | 29.1 | 29.6 | 25.7 |
| Beryllium | µg/L | 0.1 U | - |
| Boron | mg/L | - | 0.136 | - | 0.118 | - | 0.275 | - | 4.65 | - | 3.68 | - | 6.92 |
| Cadmium | µg/L | 0.01 J | 0.02 J | 0.05 U | 0.01 J | 0.01 J | 0.01 J | 0.03 J | 0.03 J | 0.12 | 0.19 | 0.02 J | 0.01 J |
| Calcium | mg/L | - | 185 | - | 99.2 | - | 161 | - | 205 | - | 250 | - | 265 |
| Chloride | mg/L | - | 22.7 | - | 9.67 | - | 10.7 | - | 113 | - | 116 | - | 169 |
| Chromium | µg/L | 0.205 | 0.1 J | 0.261 | 0.2 J | 0.224 | 0.210 | 0.311 | 0.729 | 0.323 | 0.1 J | 0.08 J | 0.1 J |
| Cobalt | µg/L | 0.02 J | 0.05 U | 0.05 U | 0.04 J | 0.061 | 0.094 | 0.138 | 0.117 | 1.72 | 1.93 | 1.67 | 1.45 |
| Combined Radium | pCi/L | 1.685 | 0.553 | 0.4389 | 0.5819 | 2.036 | 0.701 | 0.834 | 0.1393 | 1.662 | 1.038 | 0.3851 | 0.425 |
| Fluoride | mg/L | 0.14 | 0.16 | 0.23 | 0.25 | 0.06 | 0.09 | 0.22 | 0.25 | 0.24 | 0.25 | 0.19 J | 0.17 J |
| Lead | µg/L | 0.2 U | 0.2 U | 0.05 J | 0.2 U | 0.08 J | 0.07 J | 0.2 U |
| Lithium | mg/L | 0.00183 | 0.00190 | 0.0117 | 0.0126 | 0.0175 | 0.0182 | 0.0235 | 0.0218 | 0.0390 | 0.0419 | 0.0502 | 0.0495 |
| Mercury | µg/L | 0.005 U | - |
| Molybdenum | µg/L | 1 J | 0.7 J | 1 J | 0.9 J | 2 U | 2 U | 1 J | 1 J | 13.7 | 14.9 | 32.7 | 32.8 |
| Selenium | µg/L | 1.4 | 0.9 | 0.2 J | 0.09 J | 0.2 J | 0.2 J | 0.8 | 0.7 | 1.2 | 1.1 | 0.2 J | 0.2 J |
| Sulfate | mg/L | - | 274 | - | 264 | - | 387 | - | 667 | - | 715 | - | 848 |
| Thallium | µg/L | 0.5 U | 0.2 J | 0.2 J | 0.5 U | 0.5 U |
| Total Dissolved Solids | mg/L | - | 814 | - | 595 | - | 809 | - | 1,390 | - | 1,520 | - | 1,670 |
| pH | SU | 6.7 | 6.7 | 6.4 | 6.4 | 6.4 | 6.5 | 6.4 | 6.7 | 6.7 | 6.9 | 6.9 | 7.0 |

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 1 - Groundwater Data Summary
Mountaineer Plant - Bottom Ash Pond

Geosyntec Consultants

| Parameter | Unit | MW-1605S | | MW-1606D | | MW-1606S | | MW-1607D | | MW-1607S | | MW-1608 | |
|------------------------|-------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| | | 3/10/2020 | 5/19/2020 | 3/10/2020 | 5/19/2020 | 3/10/2020 | 5/19/2020 | 3/11/2020 | 5/20/2020 | 3/10/2020 | 5/20/2020 | 3/10/2020 | 5/13/2020 |
| Antimony | µg/L | 0.08 J | 0.04 J | 0.14 | 0.15 | 0.13 | 0.14 | 0.1 U | 0.03 J | 0.41 | 0.45 | 0.1 U | 0.04 J |
| Arsenic | µg/L | 0.62 | 0.47 | 0.35 | 0.32 | 0.62 | 0.65 | 1.56 | 1.42 | 0.92 | 0.93 | 0.37 | 0.36 |
| Barium | µg/L | 26.5 | 21.1 | 45.3 | 45.6 | 60.9 | 59.8 | 68.3 | 65.6 | 69.2 | 66.8 | 30.5 | 31.3 |
| Beryllium | µg/L | 0.1 U | - |
| Boron | mg/L | - | 4.83 | - | 5.92 | - | 5.94 | - | 3.89 | - | 3.55 | - | 0.108 |
| Cadmium | µg/L | 0.04 J | 0.03 J | 0.05 | 0.06 | 0.07 | 0.06 | 0.05 U | 0.05 U | 0.04 J | 0.04 J | 0.05 U | 0.02 J |
| Calcium | mg/L | - | 154 | - | 270 | - | 207 | - | 228 | - | 190 | - | 92.7 |
| Chloride | mg/L | - | 93.5 | - | 178 | - | 181 | - | 181 | - | 172 | - | 5.22 |
| Chromium | µg/L | 0.305 | 0.1 J | 0.2 J | 0.1 J | 0.1 J | 0.1 J | 0.08 J | 0.2 J | 0.321 | 0.249 | 0.264 | 0.2 J |
| Cobalt | µg/L | 0.723 | 0.208 | 1.11 | 1.10 | 0.322 | 0.435 | 0.846 | 0.913 | 1.23 | 1.42 | 0.070 | 0.092 |
| Combined Radium | pCi/L | 0.842 | 0.639 | 0.946 | 0.975 | 0.434 | 0.3814 | 2.552 | 0.815 | 1.171 | 0.3123 | 0.67 | 0.569 |
| Fluoride | mg/L | 0.30 | 0.28 | 0.27 | 0.24 | 0.40 | 0.38 | 0.41 | 0.51 | 0.24 | 0.23 | 0.21 | 0.22 |
| Lead | µg/L | 0.497 | 0.2 U | 0.2 U | 0.2 U | 0.05 J | 0.2 U | 0.2 U | 0.05 J | 0.06 J | 0.06 J | 0.06 J | 0.275 |
| Lithium | mg/L | 0.0558 | 0.0523 | 0.0700 | 0.0681 | 0.0721 | 0.0730 | 0.108 | 0.104 | 0.110 | 0.105 | 0.00229 | 0.00241 |
| Mercury | µg/L | 0.005 U | - |
| Molybdenum | µg/L | 12.8 | 12.3 | 62.5 | 67.0 | 51.7 | 56.0 | 79.6 | 83.5 | 35.5 | 35.8 | 0.6 J | 0.7 J |
| Selenium | µg/L | 0.8 | 0.7 | 0.5 | 0.5 | 4.4 | 5.3 | 0.04 J | 0.08 J | 4.5 | 5.7 | 4.3 | 2.1 |
| Sulfate | mg/L | - | 543 | - | 756 | - | 646 | - | 722 | - | 407 | - | 158 |
| Thallium | µg/L | 0.5 U |
| Total Dissolved Solids | mg/L | - | 1,160 | - | 1,600 | - | 1,400 | - | 1,620 | - | 1,230 | - | 440 |
| pH | SU | 6.9 | 6.9 | 7.0 | 7.0 | 6.8 | 6.7 | 7.1 | 7.2 | 6.9 | 7.0 | 6.7 | 6.8 |

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
Mountaineer Plant - Bottom Ash Pond

Geosyntec Consultants, Inc.

| Constituent Name | MCL | CCR Rule-Specified | Background Limit |
|--------------------------------|-------|-----------------------|------------------|
| Antimony, Total (mg/L) | 0.006 | | 0.0001 |
| Arsenic, Total (mg/L) | 0.01 | | 0.00074 |
| Barium, Total (mg/L) | 2 | | 0.068 |
| Beryllium, Total (mg/L) | 0.004 | | 0.0001 |
| Cadmium, Total (mg/L) | 0.005 | | 0.00003 |
| Chromium, Total (mg/L) | 0.1 | | 0.0008 |
| Cobalt, Total (mg/L) | n/a | 0.006 | 0.0006 |
| Combined Radium, Total (pCi/L) | 5 | | 2.30 |
| Fluoride, Total (mg/L) | 4 | | 0.29 |
| Lead, Total (mg/L) | n/a | 0.015 | 0.00088 |
| Lithium, Total (mg/L) | n/a | 0.04 | 0.025 |
| Mercury, Total (mg/L) | 0.002 | | 0.000005 |
| Molybdenum, Total (mg/L) | n/a | 0.1 | 0.0028 |
| Selenium, Total (mg/L) | 0.05 | | 0.0043 |
| Thallium, Total (mg/L) | 0.002 | | 0.0005 |

Notes:

Grey cell indicates calculated UTL is higher than MCL.

MCL = Maximum Contaminant Level

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
Mountaineer Plant - Bottom Ash Pond**

Geosyntec Consultants, Inc.

| Analyte | Unit | Description | MW-1604D | MW-1604S | MW-1605D | MW-1605S | MW-1606D | MW-1606S | MW-1607D | MW-1607S |
|------------------------|------|----------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| | | | 5/14/2020 | 5/14/2020 | 5/19/2020 | 5/19/2020 | 5/19/2020 | 5/19/2020 | 5/20/2020 | 5/20/2020 |
| Boron | mg/L | Interwell Background Value (UPL) | | | | 0.614 | | | | |
| | | Analytical Result | 4.65 | 3.68 | 6.92 | 4.83 | 5.92 | 5.94 | 3.89 | 3.55 |
| Calcium | mg/L | Interwell Background Value (UPL) | | | | 200 | | | | |
| | | Analytical Result | 205 | 250 | 265 | 154 | 270 | 207 | 228 | 190 |
| Chloride | mg/L | Interwell Background Value (UPL) | | | | 68.5 | | | | |
| | | Analytical Result | 113 | 116 | 169 | 93.5 | 178 | 181 | 181 | 172 |
| Fluoride | mg/L | Interwell Background Value (UPL) | | | | 0.271 | | | | |
| | | Analytical Result | 0.25 | 0.25 | 0.17 | 0.28 | 0.24 | 0.38 | 0.51 | 0.23 |
| pH | SU | Intrawell Background Value (UPL) | 7.8 | 7.8 | 7.9 | 7.9 | 7.9 | 8.1 | 8.0 | 7.8 |
| | | Intrawell Background Value (LPL) | 6.7 | 6.6 | 6.9 | 6.8 | 6.9 | 6.1 | 7.0 | 7.2 |
| | | Analytical Result | 6.7 | 6.9 | 7.0 | 6.9 | 7.0 | 6.7 | 7.2 | 7.0 |
| Sulfate | mg/L | Interwell Background Value (UPL) | | | | 674 | | | | |
| | | Analytical Result | 667 | 715 | 848 | 543 | 756 | 646 | 722 | 407 |
| Total Dissolved Solids | mg/L | Interwell Background Value (UPL) | | | | 1,040 | | | | |
| | | Analytical Result | 1,390 | 1,520 | 1,670 | 1,160 | 1,600 | 1,400 | 1,620 | 1,230 |

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

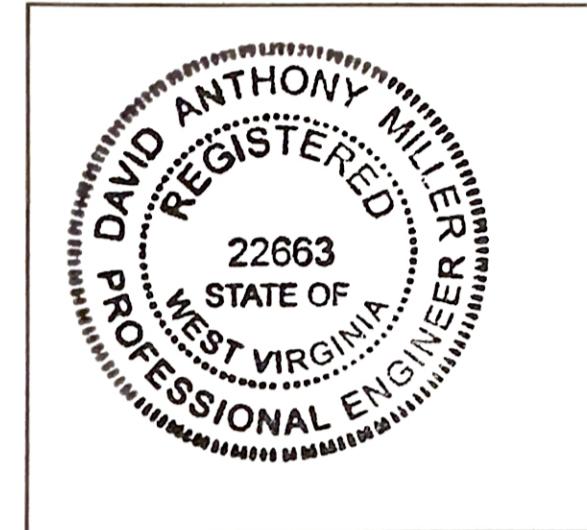
I certify that the selected and above described statistical method is appropriate for evaluating the groundwater monitoring data for the Mountaineer Bottom Ash Pond CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER
Printed Name of Licensed Professional Engineer

David Anthony Miller
Signature

22663
License Number

WEST VIRGINIA
Licensing State

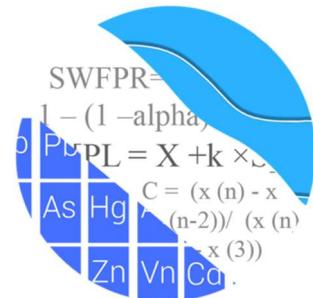


10.06.2020
Date

ATTACHMENT B

Statistical Analysis Output

GROUNDWATER STATS
CONSULTING



August 28, 2020

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

Re: Mountaineer BAP – Assessment Monitoring Report May 2020

Groundwater Stats Consulting, formerly the statistical consulting division of Sanitas Technologies, is pleased to provide the Assessment Monitoring statistical analysis of groundwater data through May 2020 for American Electric Power Inc.'s Mountaineer 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 began at the site for the CCR program in 2016. The monitoring well network, as provided by Geosyntec Consultants, consists of the following:

- **Upgradient wells:** MW-1601A, MW-1602, MW-1603, MW-1608; and
- **Downgradient wells:** MW-1604D, MW-1604S, MW-1605D, MW-1605S, MW-1606D, MW-1606S, MW-1607D, MW-1607S.

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

The CCR program consists of the following Assessment Monitoring constituents:

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

Time series plots for Appendix IV parameters are provided for all wells and are used to evaluate concentrations over time (Figure A). Additionally, box plots are included for all constituents at upgradient and downgradient wells (Figure B). Values in background which have been flagged as outliers may be seen in a lighter font and as a disconnected symbol on the graph. A summary of these values follows this letter (Figure C). The time series plots are used to initially screen for suspected outliers and trends, while the box plots provide visual representation of variation within individual wells and between all wells.

Evaluation of Appendix IV Parameters – May 2020

Interwell Tolerance limits were used to calculate background limits from all available pooled upgradient well data for Appendix IV parameters to determine the background limit for each constituent (Figure D). Background data were screened for outliers in December 2019 and extreme trending patterns that would lead to artificially elevated statistical limits. In some cases, due to the natural log transformation, Tukey's test did not identify outliers for values which were significantly higher than remaining observations in a given well. For instance, during the December 2016 sample event, high values were reported for chromium in several wells (both upgradient and downgradient). These values were flagged in the database as outliers as they did not appear to represent the population at these wells. Any flagged values may be seen on the Outlier Summary following this letter.

Parametric limits use a target of 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 Standard (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 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 found except for lithium in wells MW-1605D, MW1605S, MW-1606D, MW-1606S, MW-1607D and MW-1607S. 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 Mountaineer BAP. If you have any questions or comments, please feel free to contact us.

For Groundwater Stats Consulting,



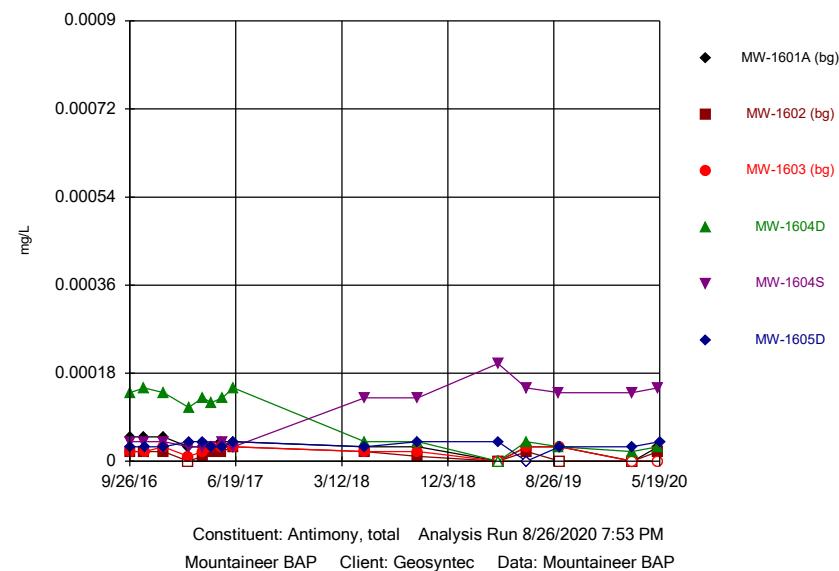
Easton Rayner
Groundwater Analyst



Kristina L. Rayner
Groundwater Statistician

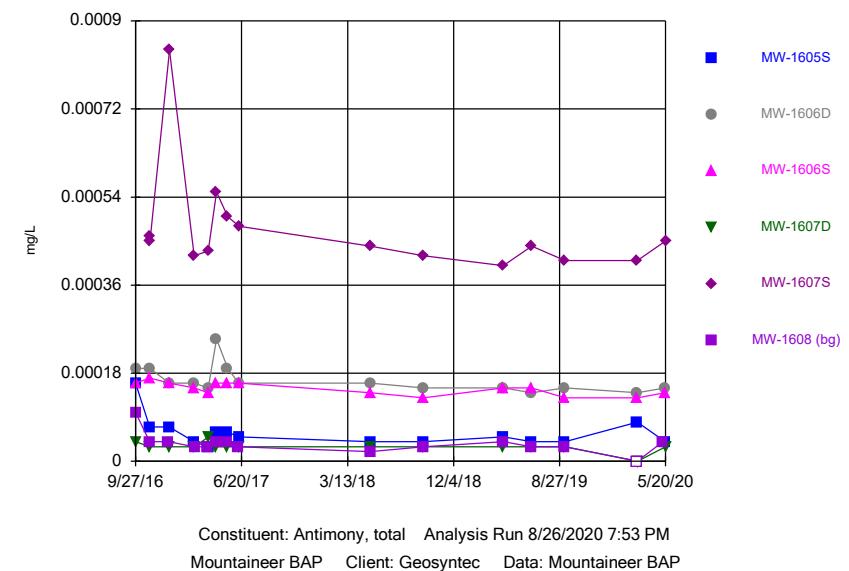
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Hollow symbols indicate censored values.

Time Series



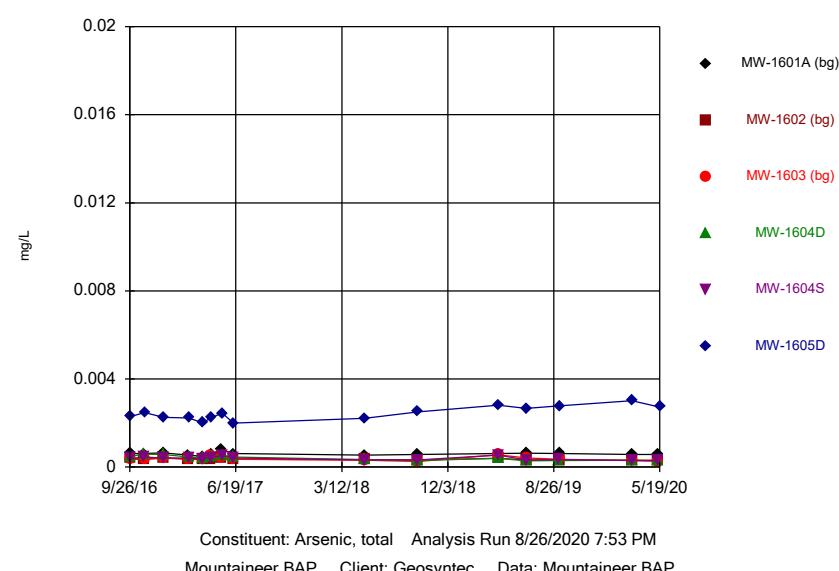
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Hollow symbols indicate censored values.

Time Series



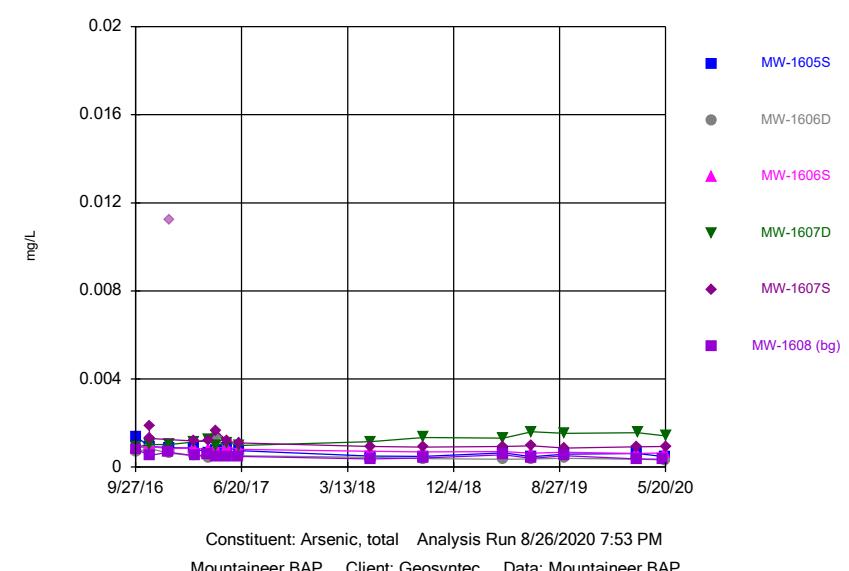
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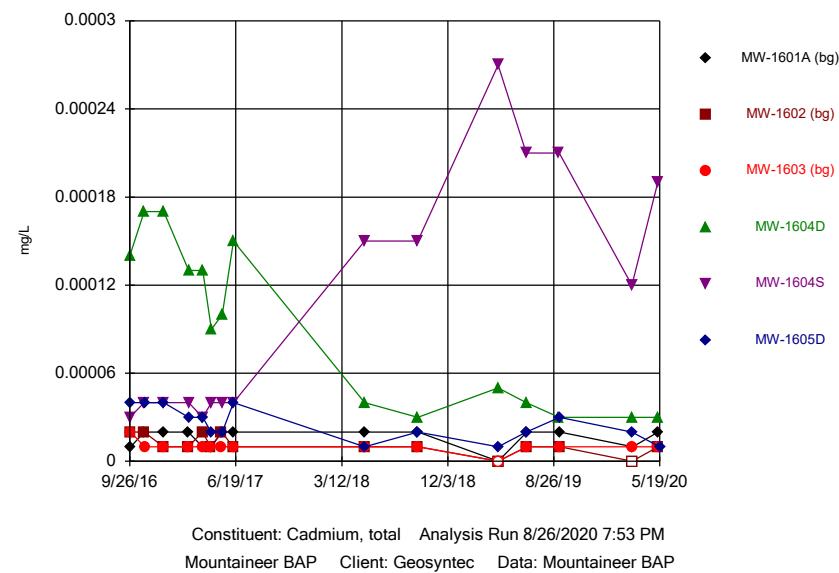
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Time Series



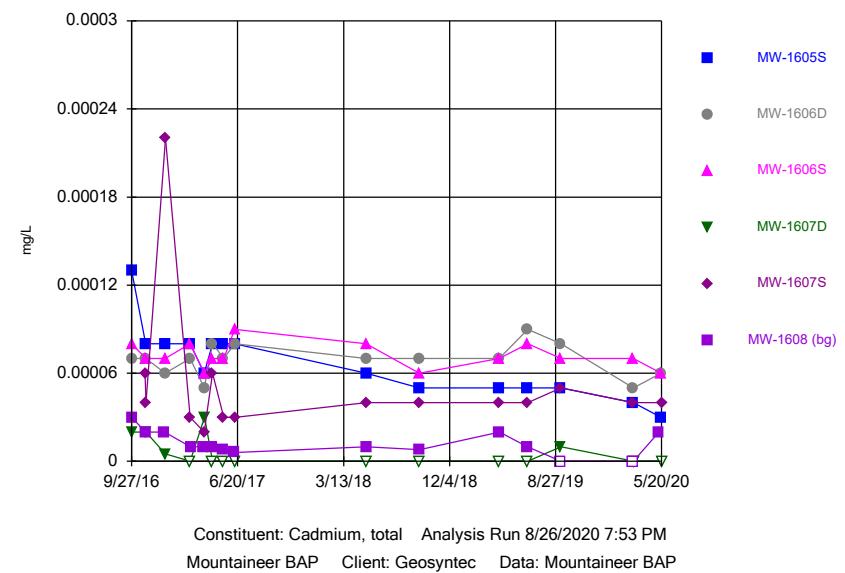
Sanitas™ v.9.6.26g . UG
Hollow symbols indicate censored values.

Time Series



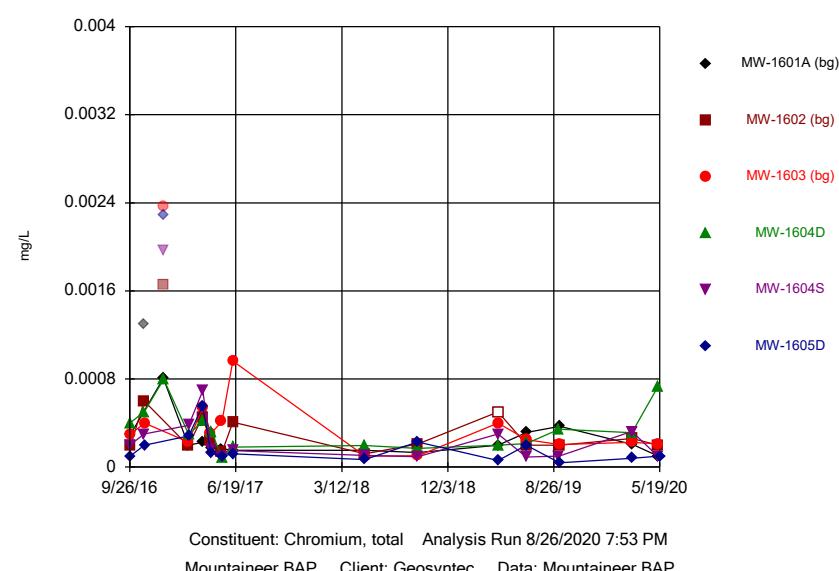
Sanitas™ v.9.6.26g . UG
Hollow symbols indicate censored values.

Time Series



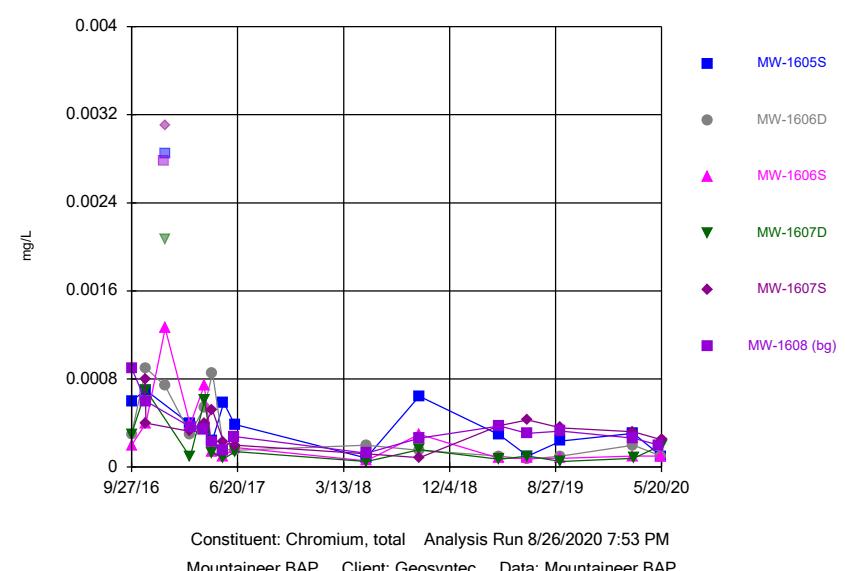
Sanitas™ v.9.6.26g . UG
Hollow symbols indicate censored values.

Time Series



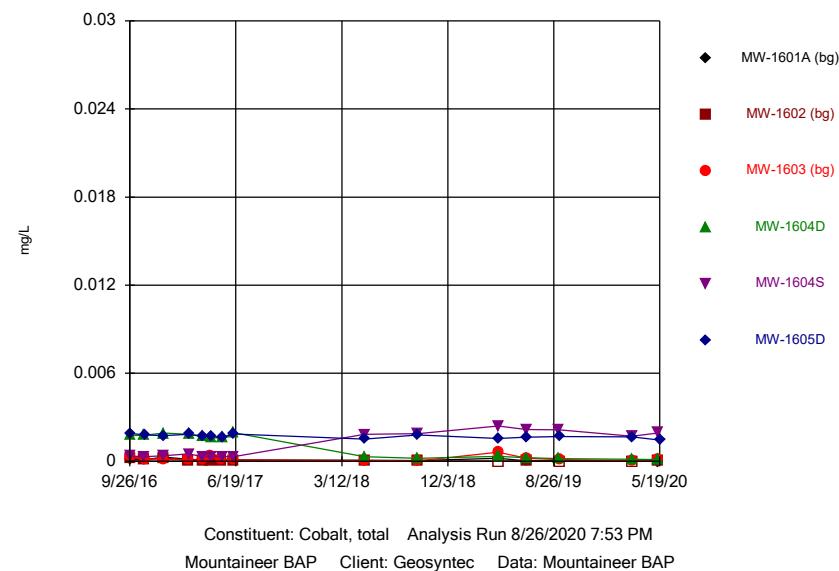
Sanitas™ v.9.6.26g . UG

Time Series



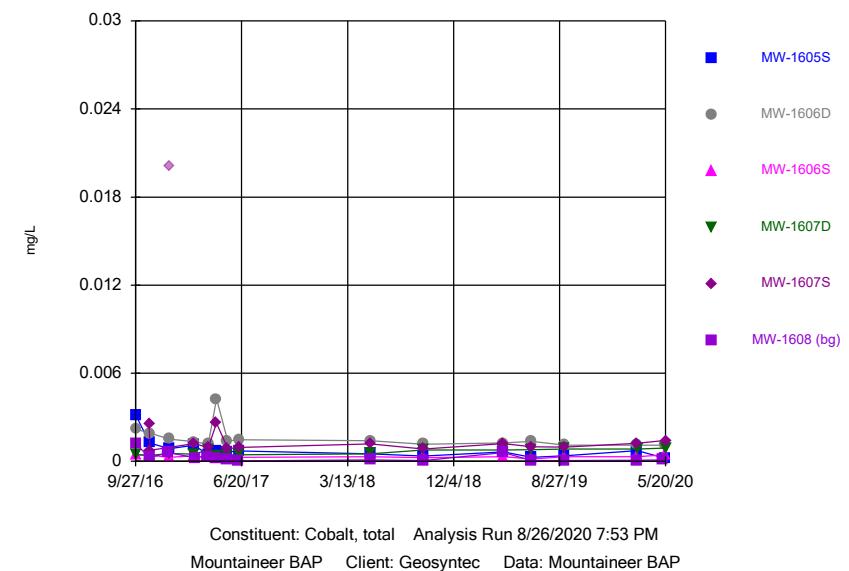
Sanitas™ v.9.6.26g . UG
Hollow symbols indicate censored values.

Time Series



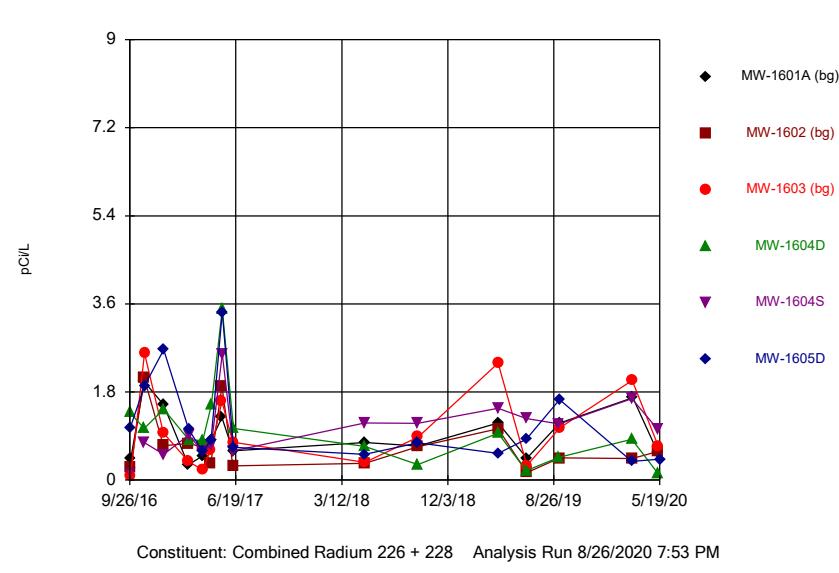
Sanitas™ v.9.6.26g . UG

Time Series



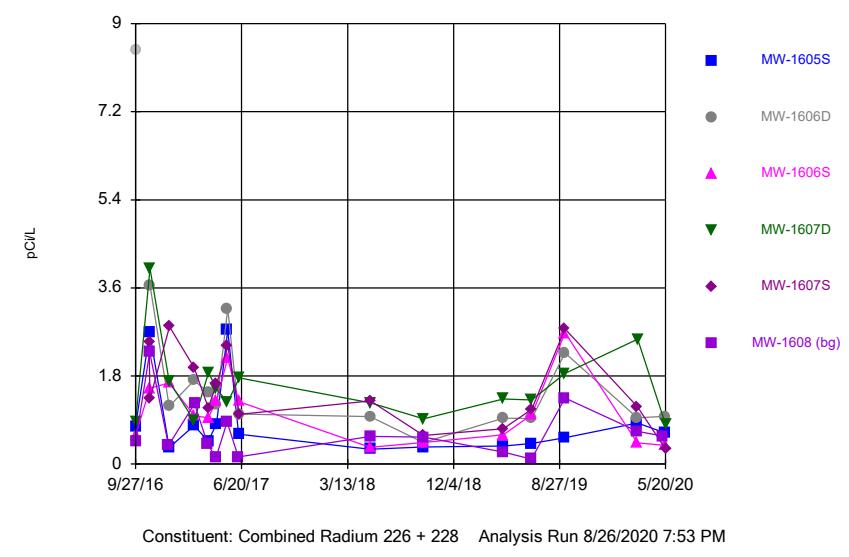
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Time Series

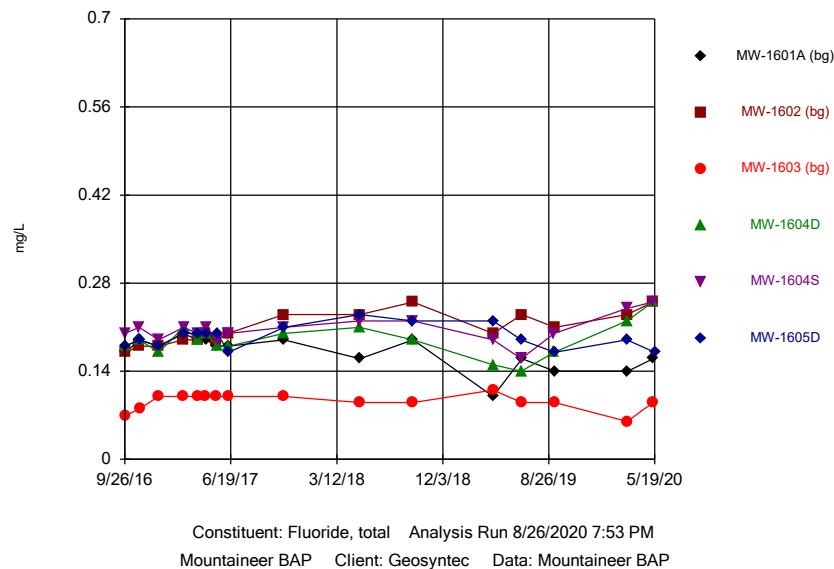


Sanitas™ v.9.6.26g . UG

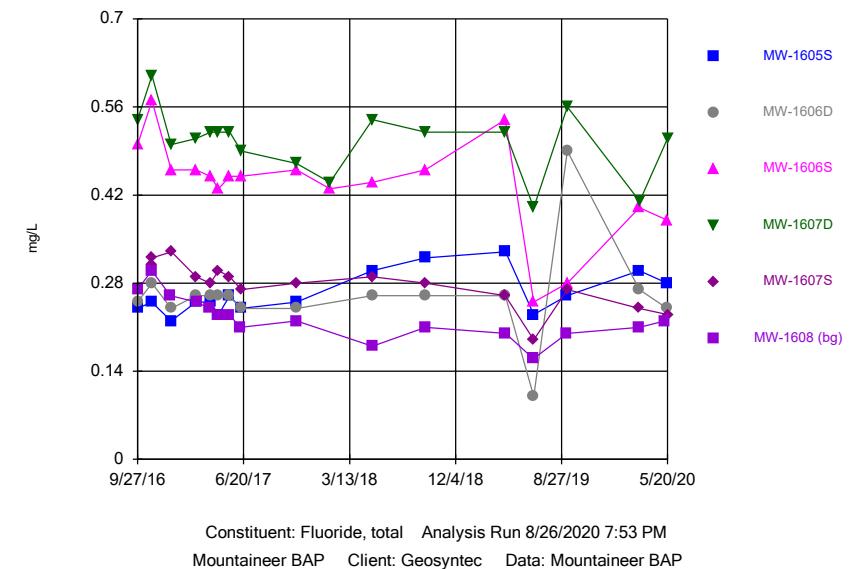
Time Series



Time Series

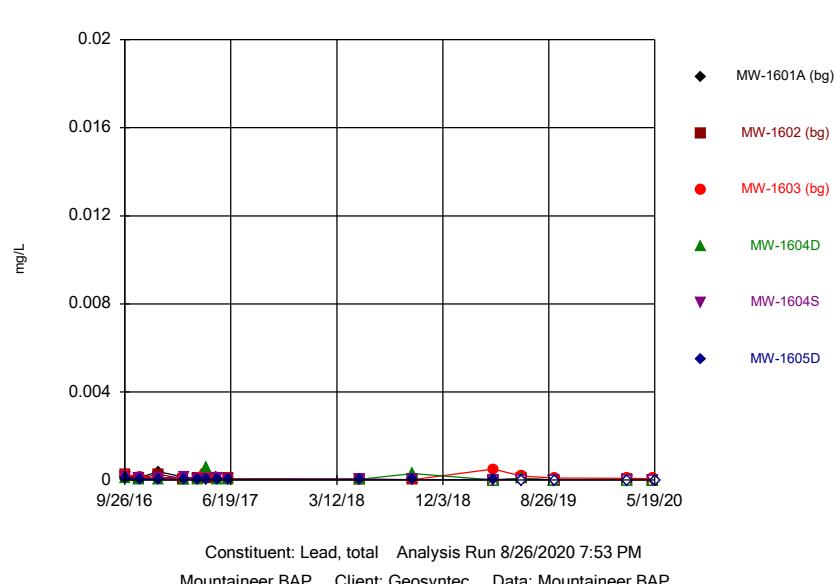


Time Series



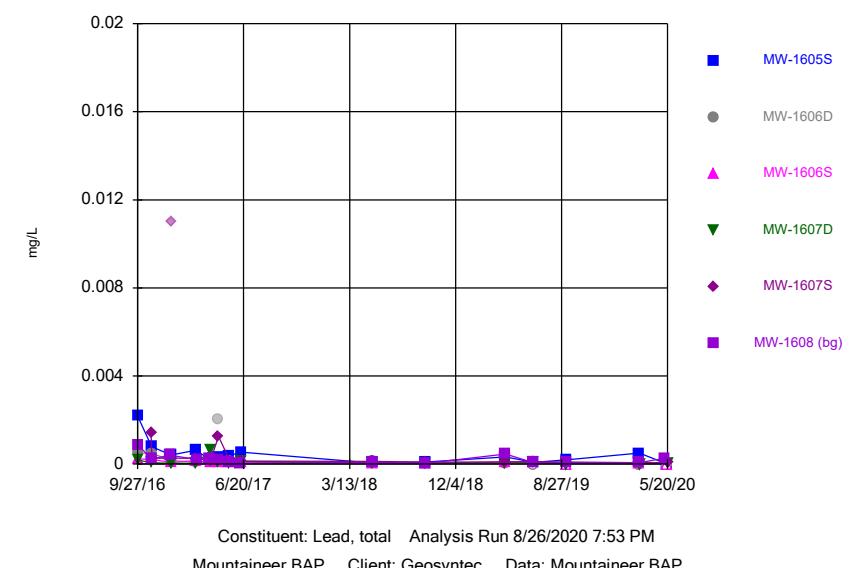
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Hollow symbols indicate censored values.

Time Series



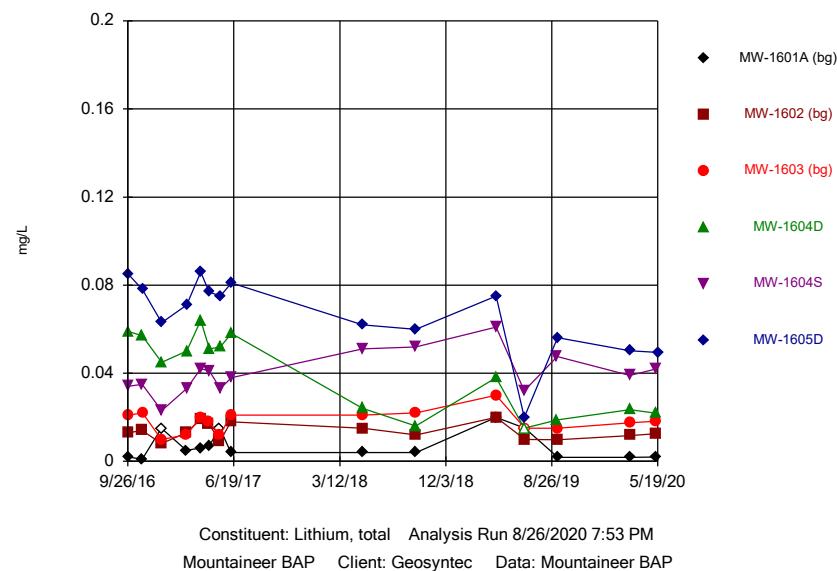
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Hollow symbols indicate censored values.

Time Series



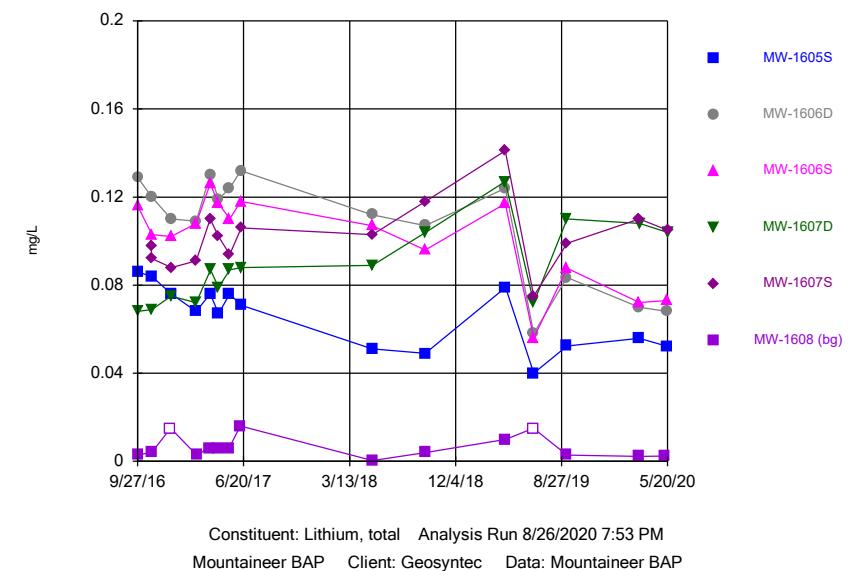
Sanitas™ v.9.6.26g . UG
Hollow symbols indicate censored values.

Time Series



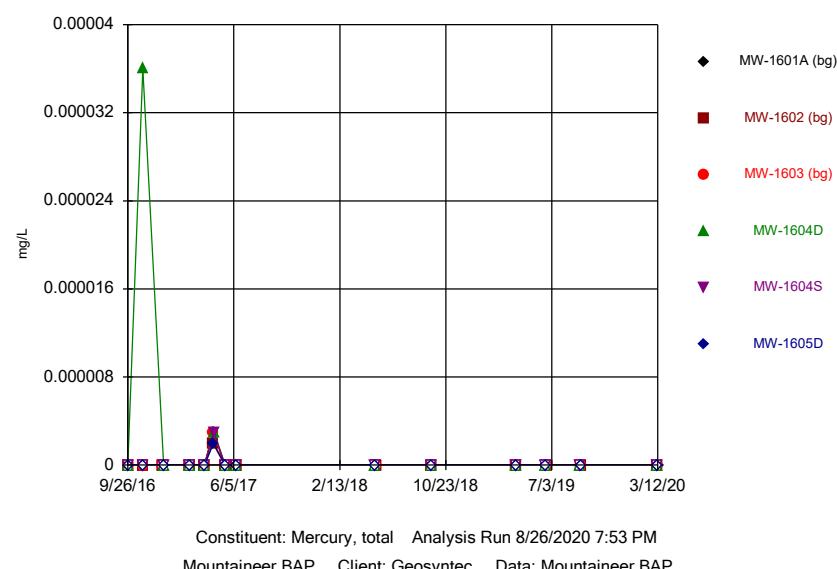
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Hollow symbols indicate censored values.

Time Series



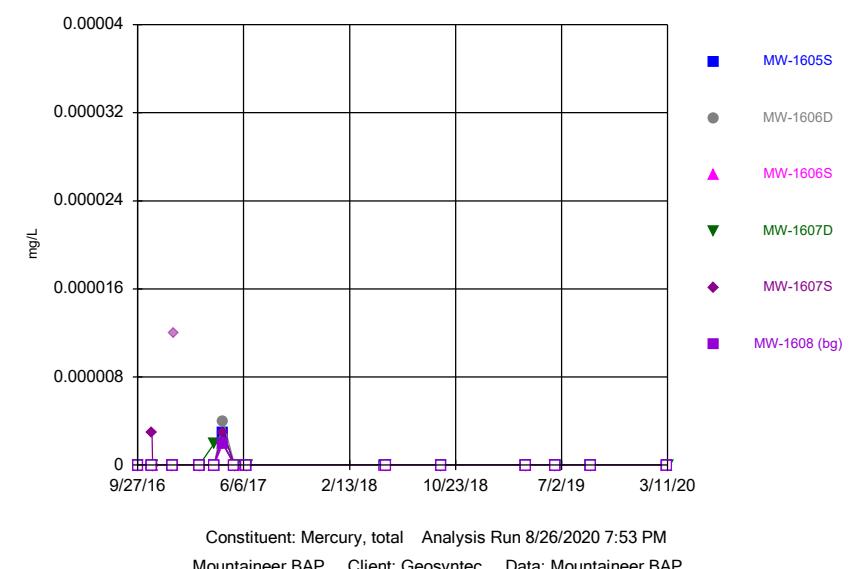
Sanitas™ v.9.6.26g . UG
Hollow symbols indicate censored values.

Time Series



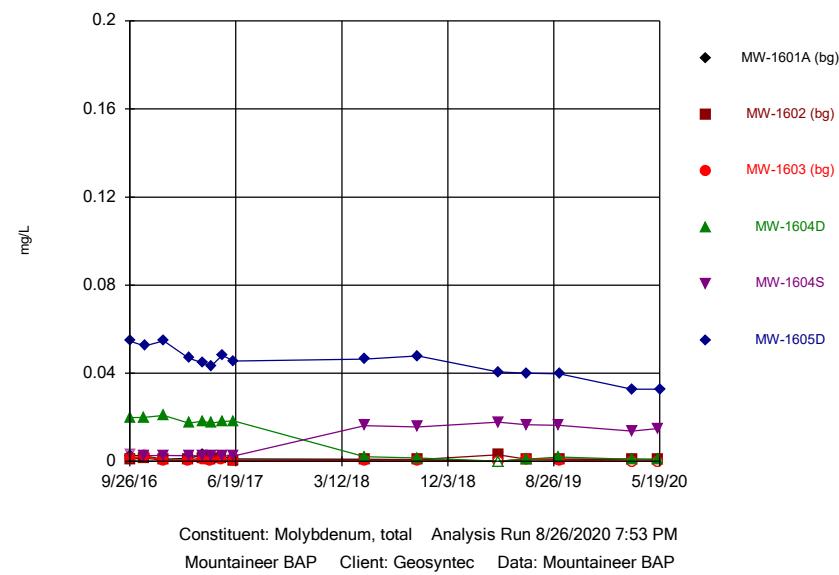
Sanitas™ v.9.6.26g . UG
Hollow symbols indicate censored values.

Time Series



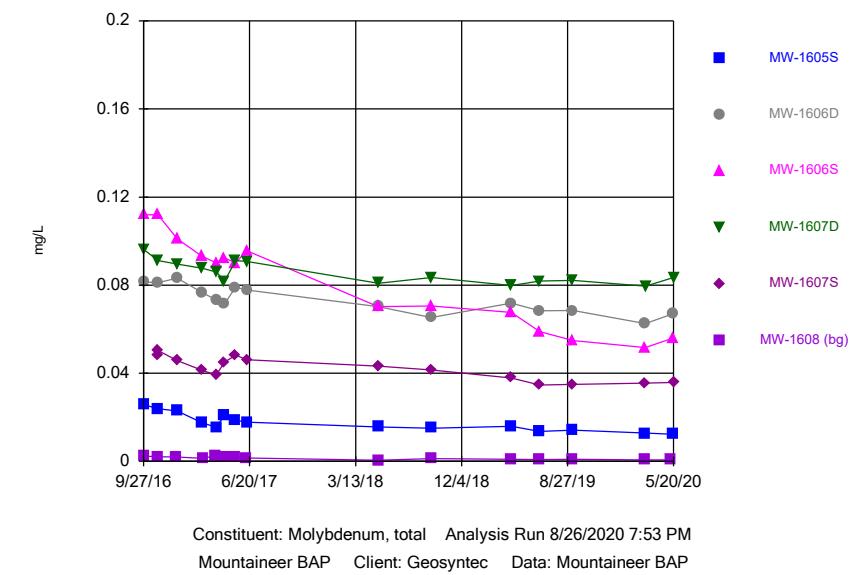
Sanitas™ v.9.6.26g . UG
Hollow symbols indicate censored values.

Time Series



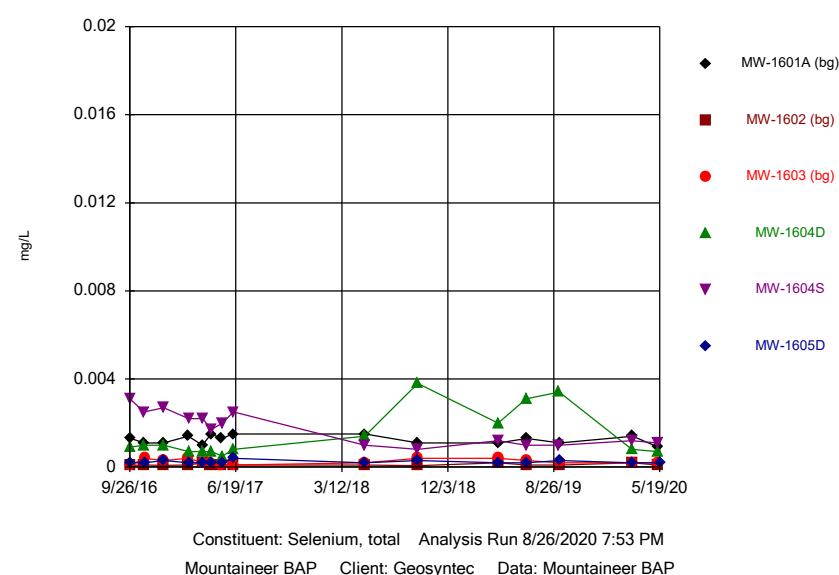
Sanitas™ v.9.6.26g . UG

Time Series



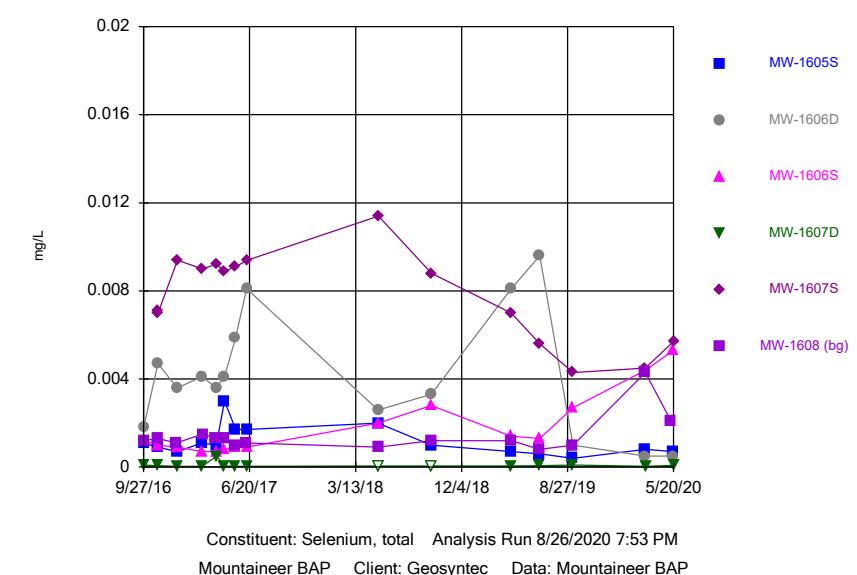
Sanitas™ v.9.6.26g . UG

Time Series



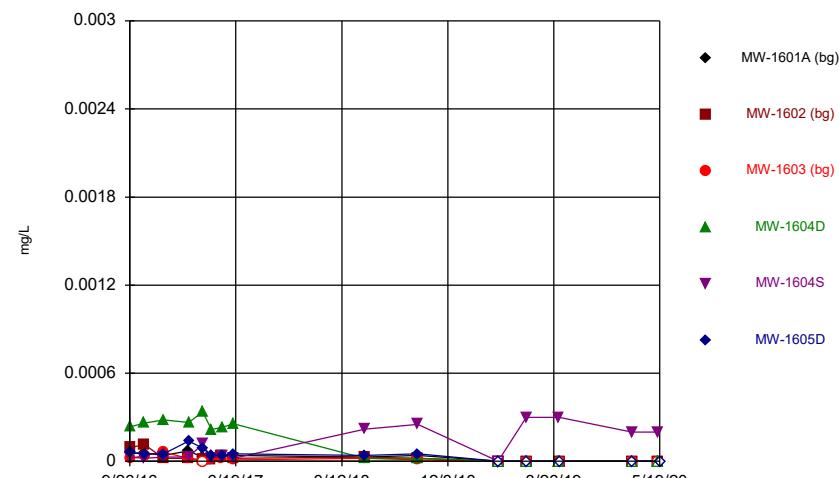
Sanitas™ v.9.6.26g . UG
Hollow symbols indicate censored values.

Time Series



Sanitas™ v.9.6.26g . UG
Hollow symbols indicate censored values.

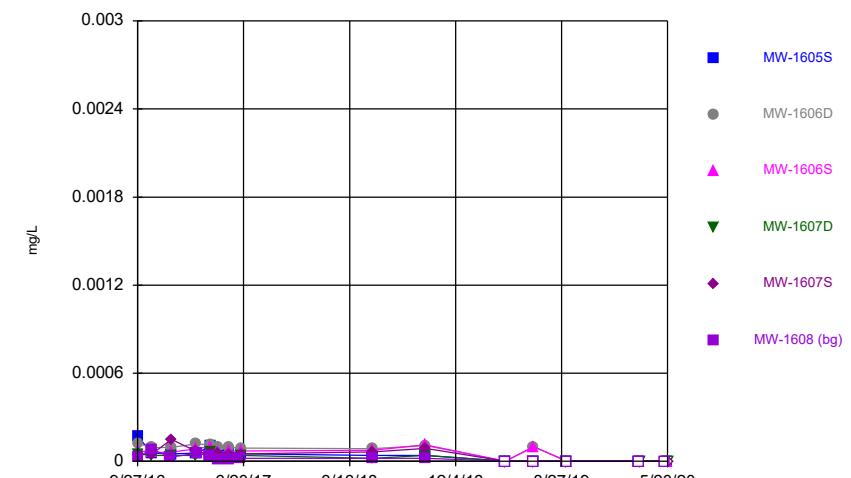
Time Series



Constituent: Thallium, total Analysis Run 8/26/2020 7:53 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

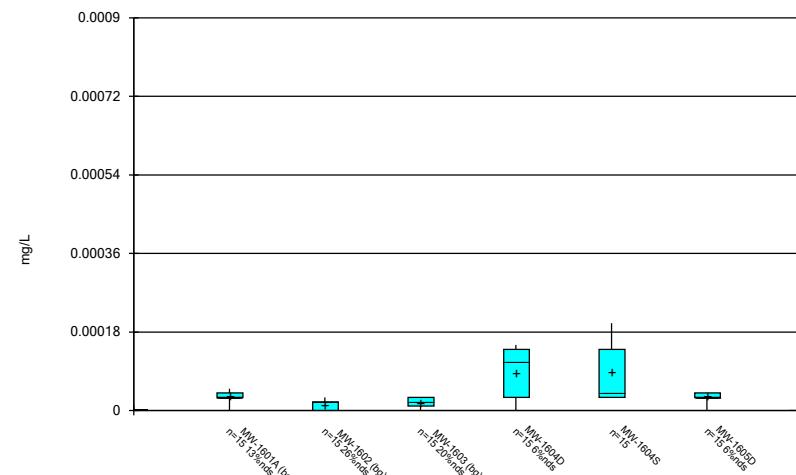
Sanitas™ v.9.6.26g . UG
Hollow symbols indicate censored values.

Time Series

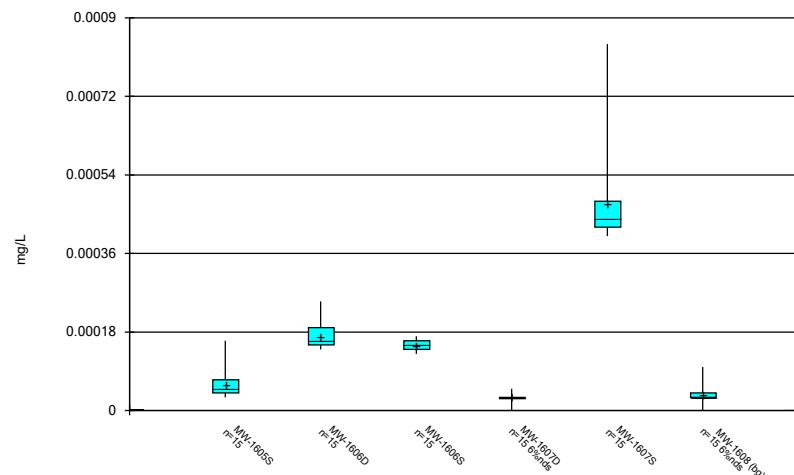


Constituent: Thallium, total Analysis Run 8/26/2020 7:53 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

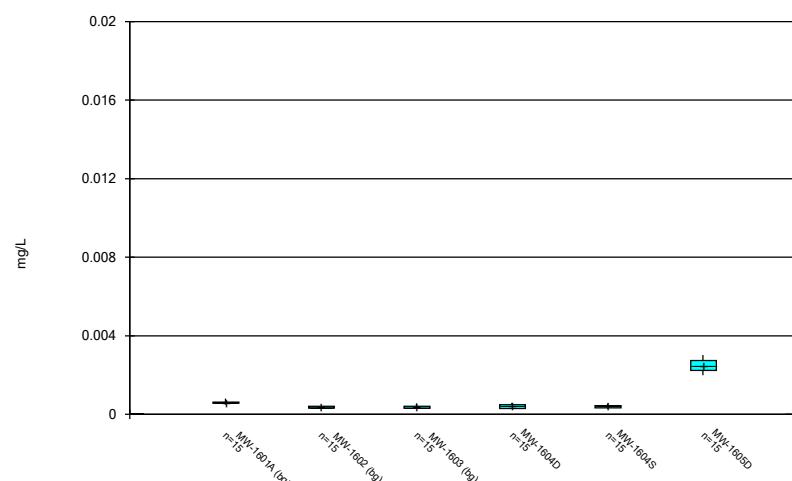
Box & Whiskers Plot



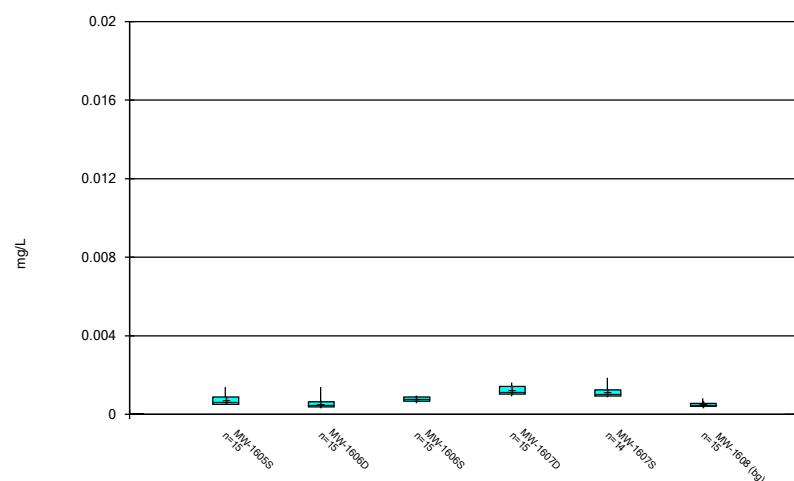
Box & Whiskers Plot



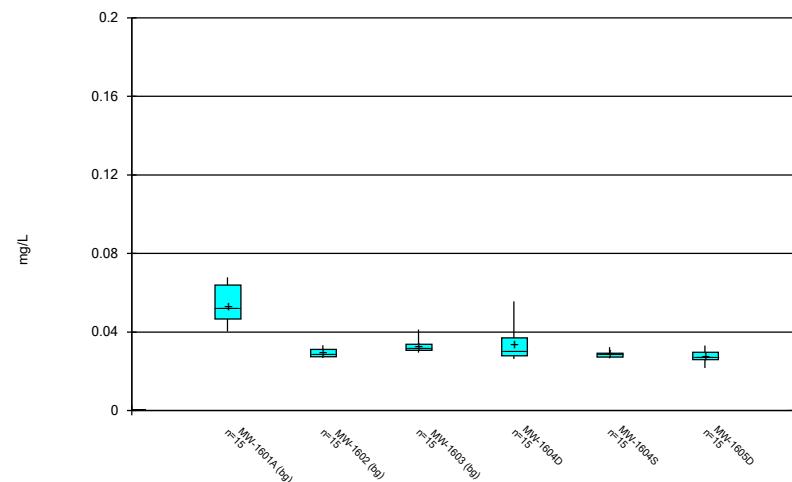
Box & Whiskers Plot



Box & Whiskers Plot

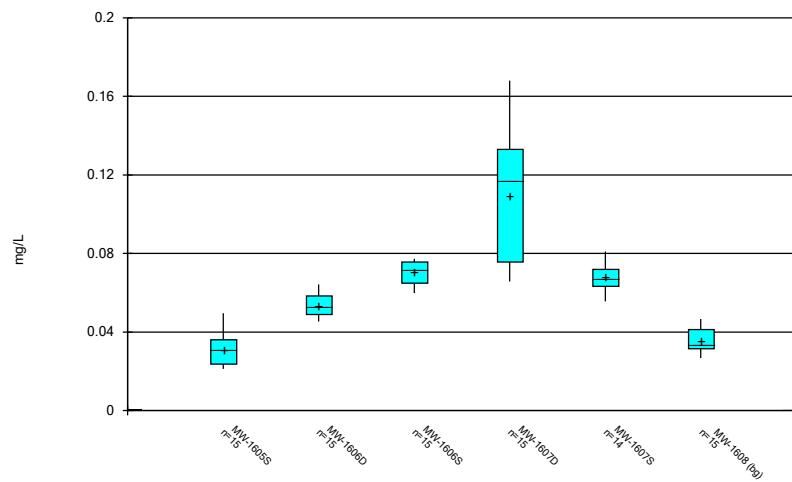


Box & Whiskers Plot



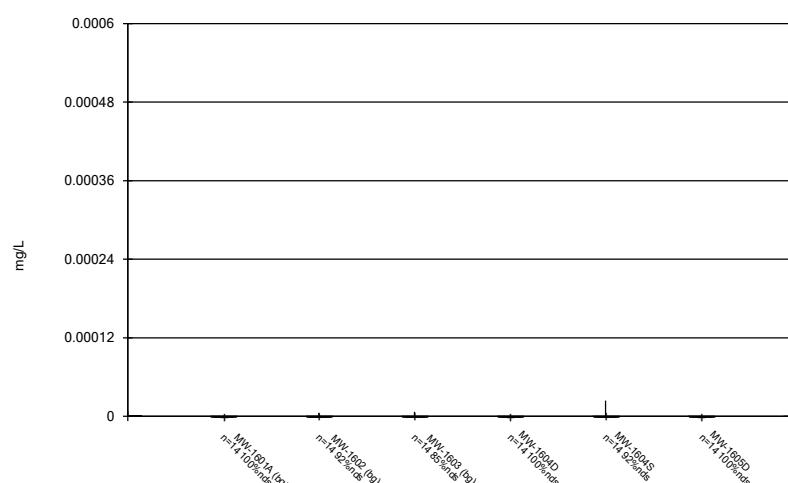
Constituent: Barium, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



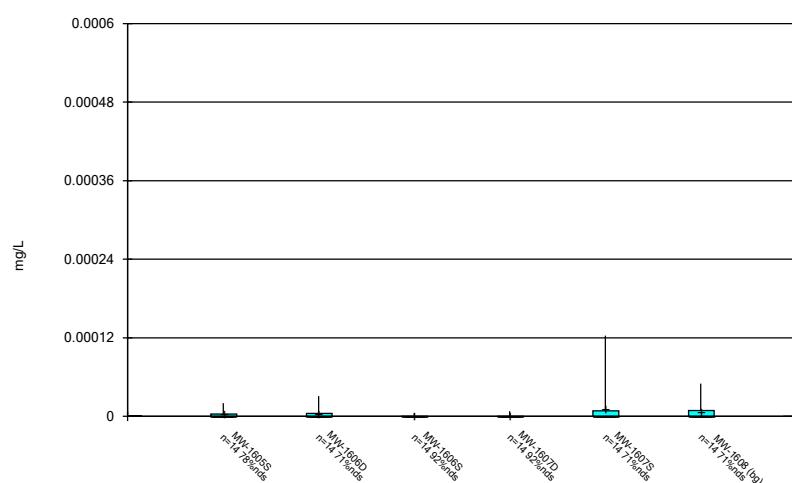
Constituent: Barium, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



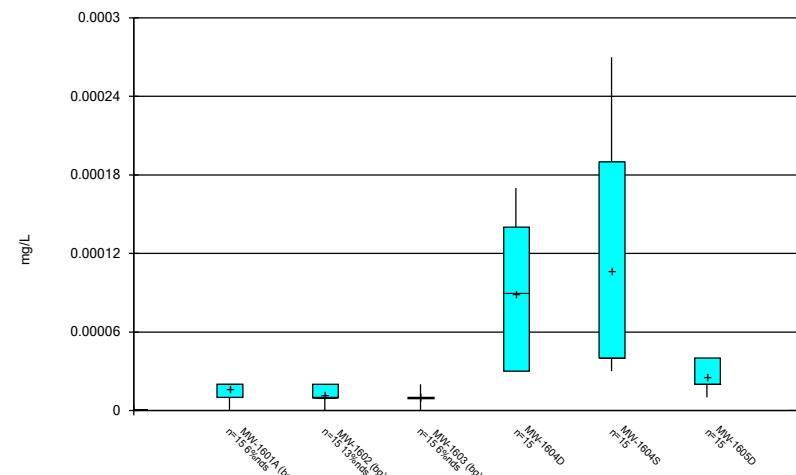
Constituent: Beryllium, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



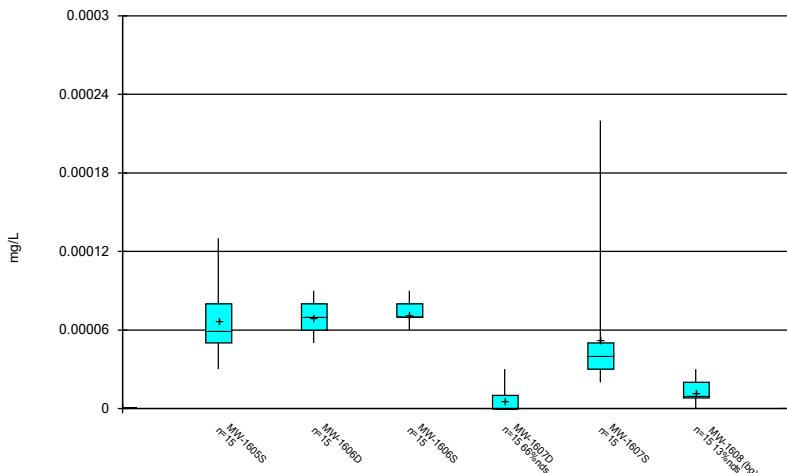
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Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



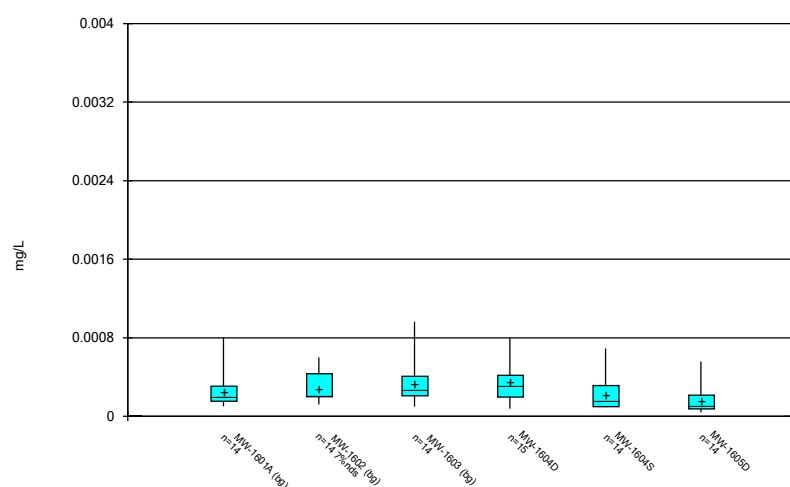
Constituent: Cadmium, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



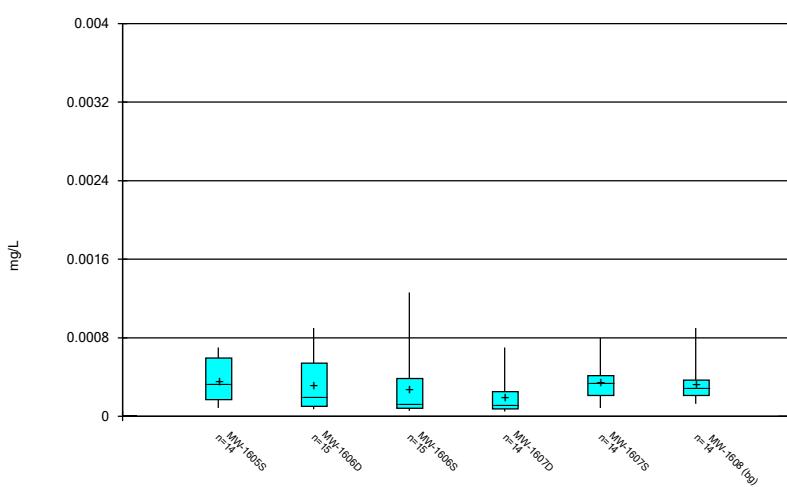
Constituent: Cadmium, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



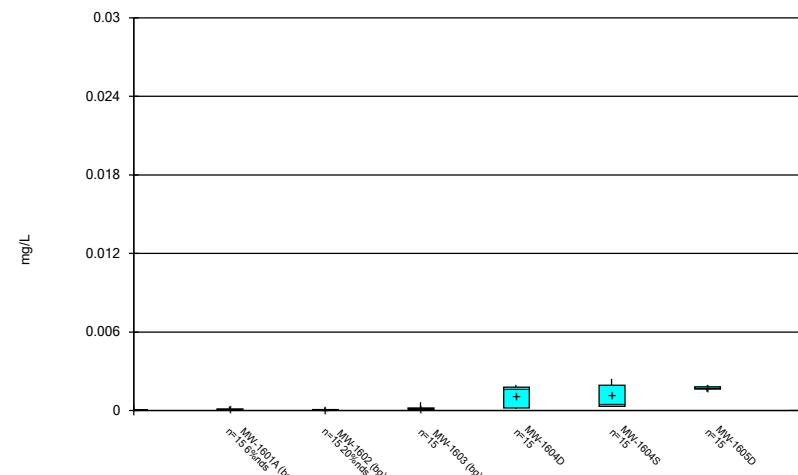
Constituent: Chromium, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



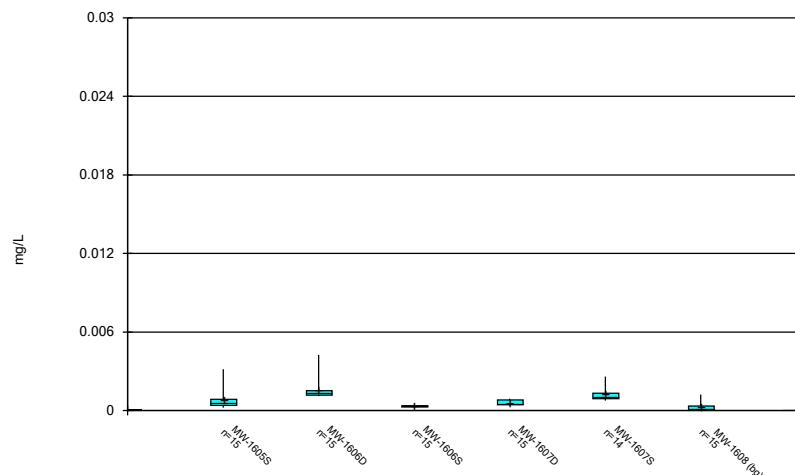
Constituent: Chromium, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



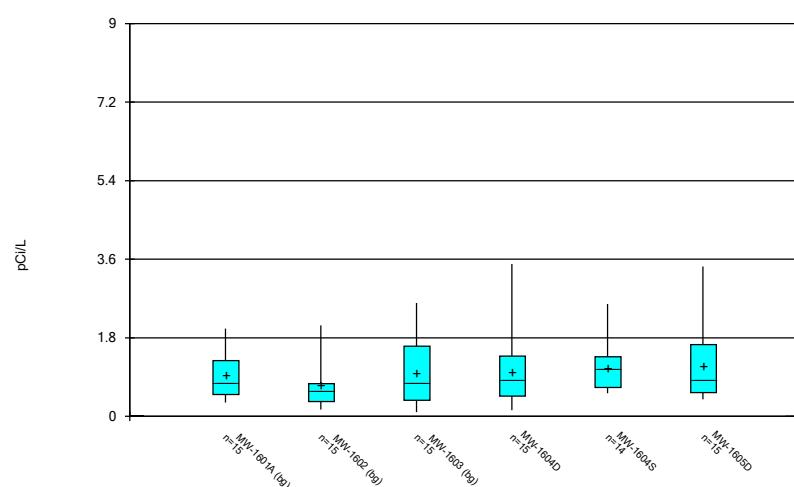
Constituent: Cobalt, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



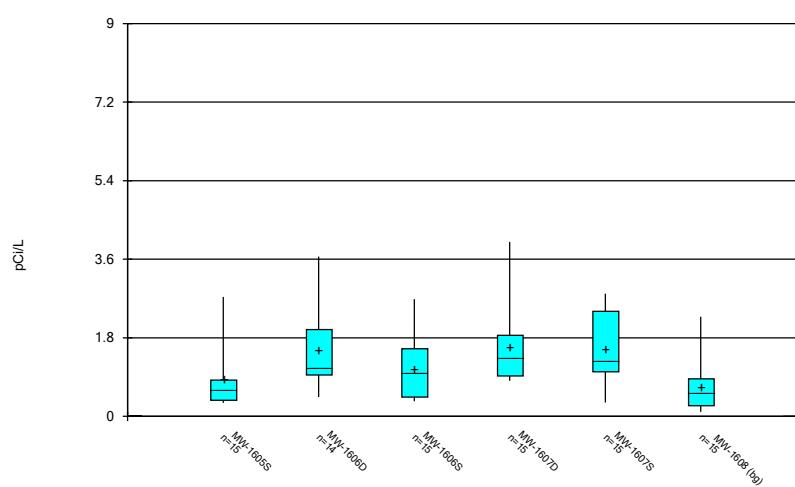
Constituent: Cobalt, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



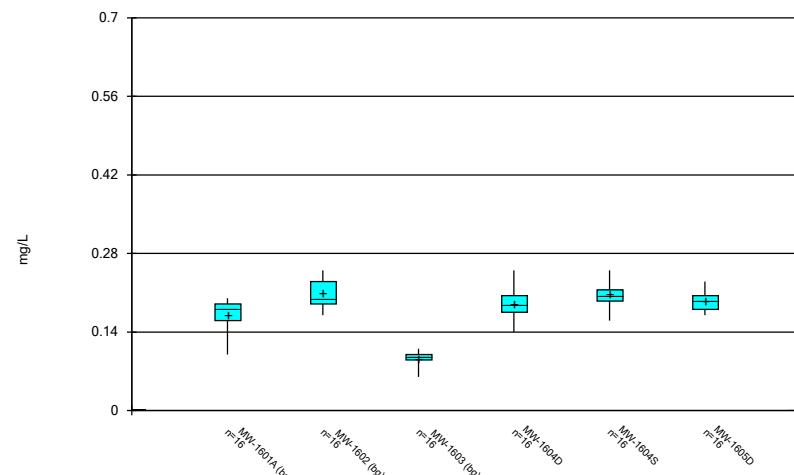
Constituent: Combined Radium 226 + 228 Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



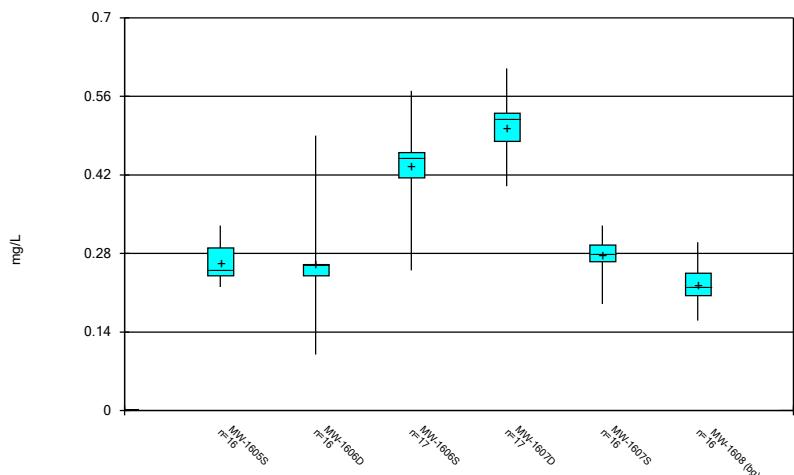
Constituent: Combined Radium 226 + 228 Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



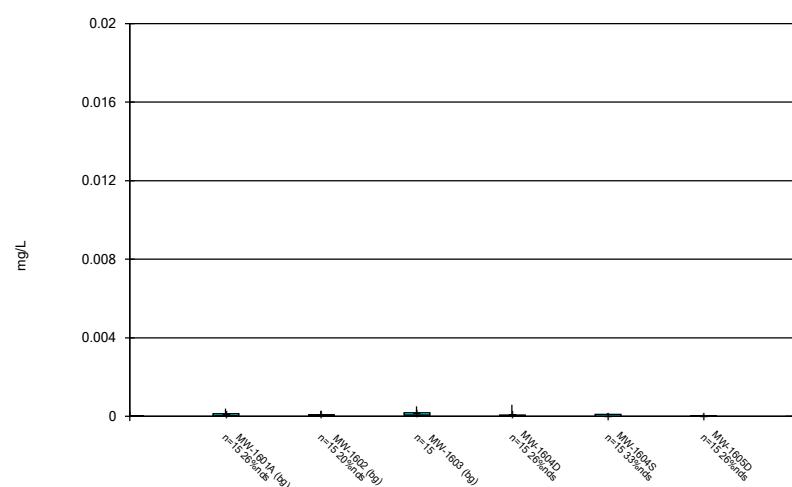
Constituent: Fluoride, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



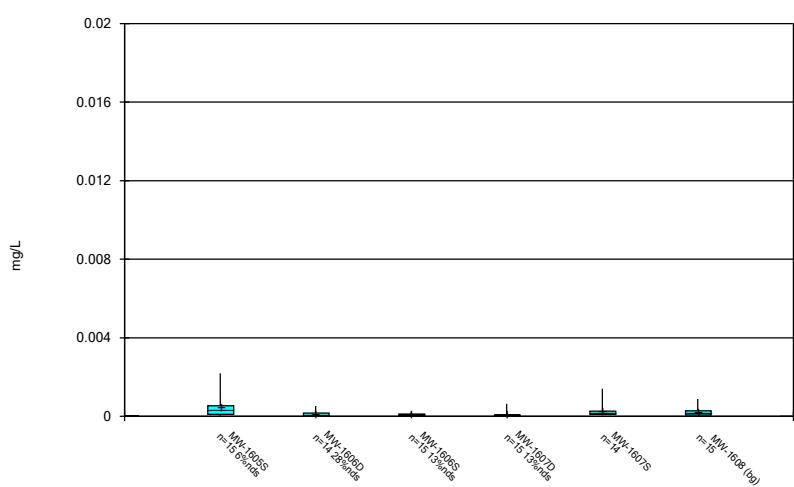
Constituent: Fluoride, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



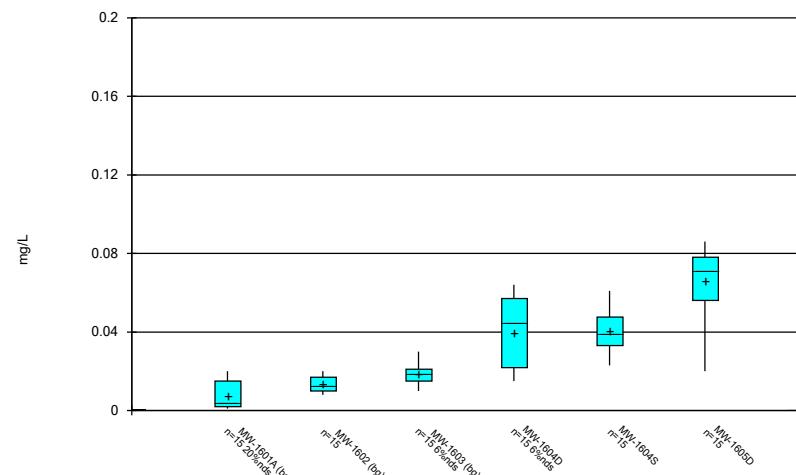
Constituent: Lead, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot

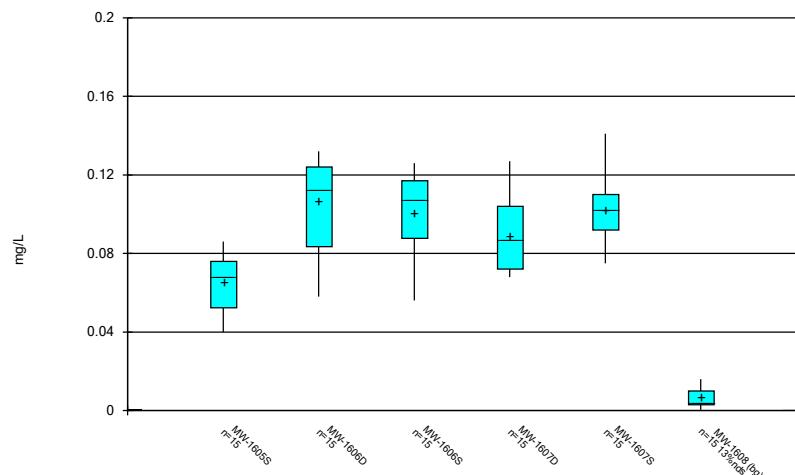


Constituent: Lead, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

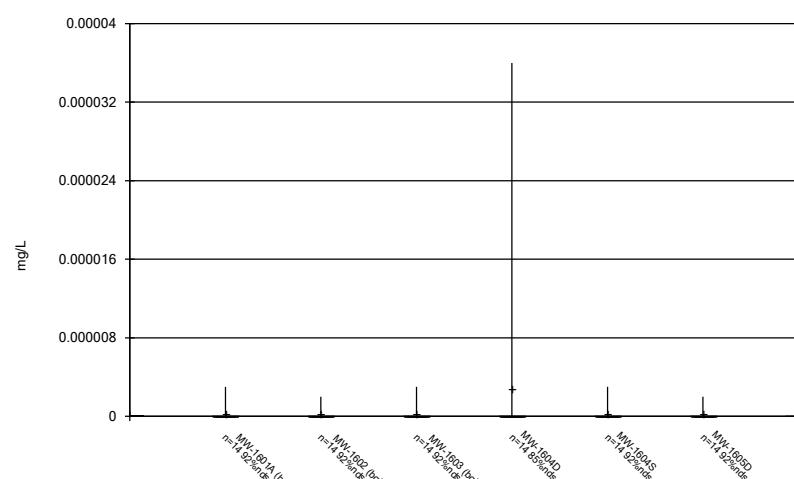
Box & Whiskers Plot



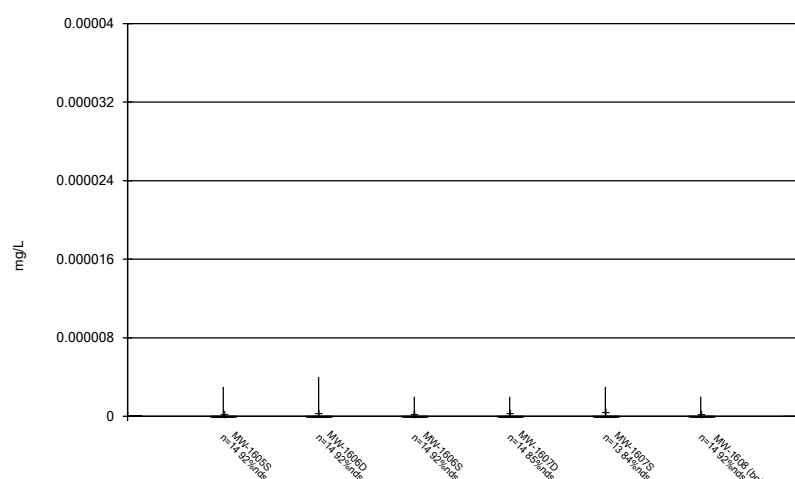
Box & Whiskers Plot



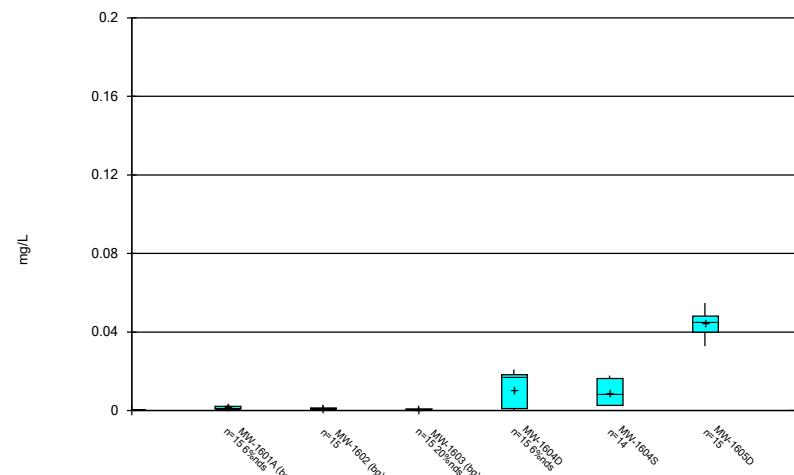
Box & Whiskers Plot



Box & Whiskers Plot

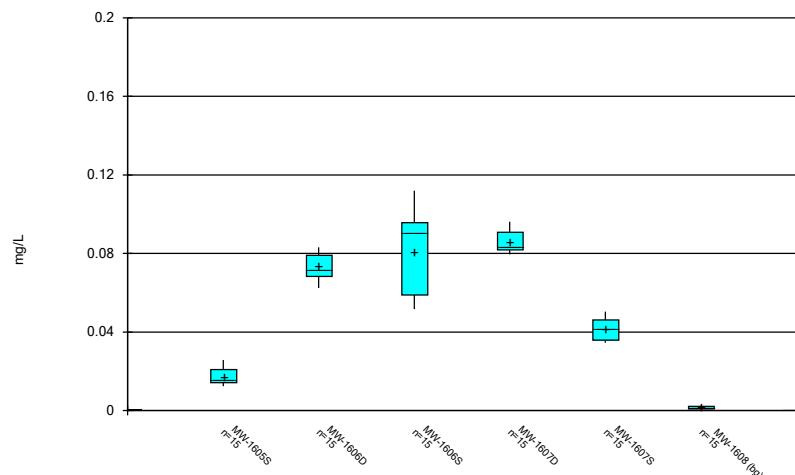


Box & Whiskers Plot



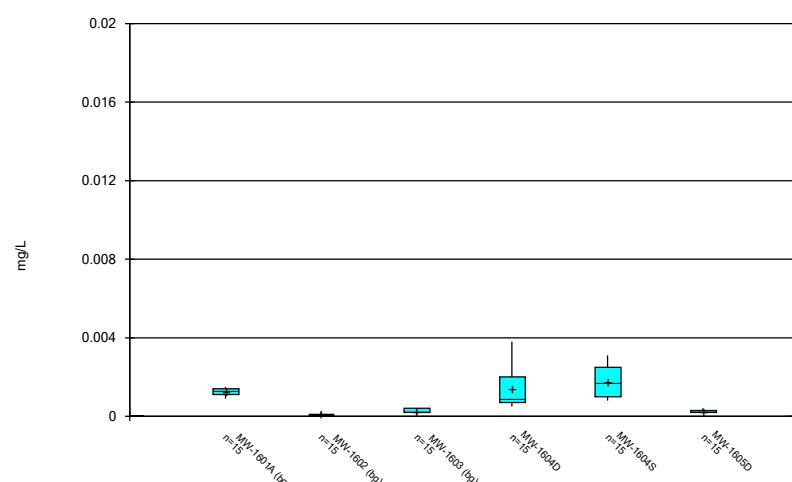
Constituent: Molybdenum, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



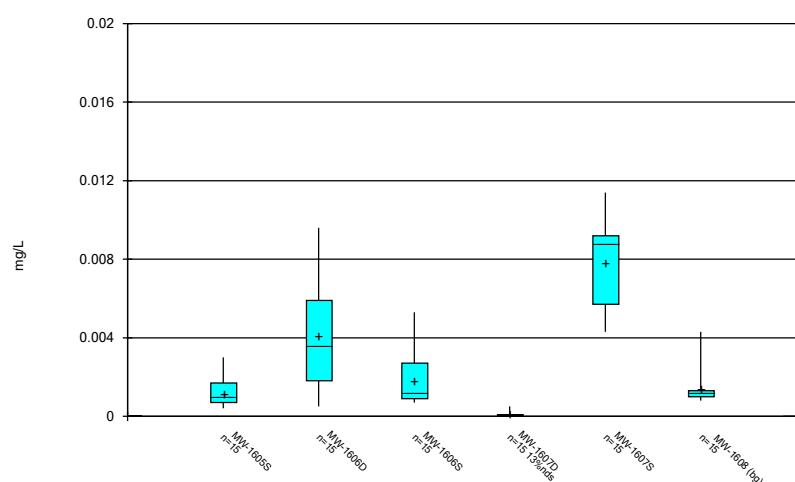
Constituent: Molybdenum, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



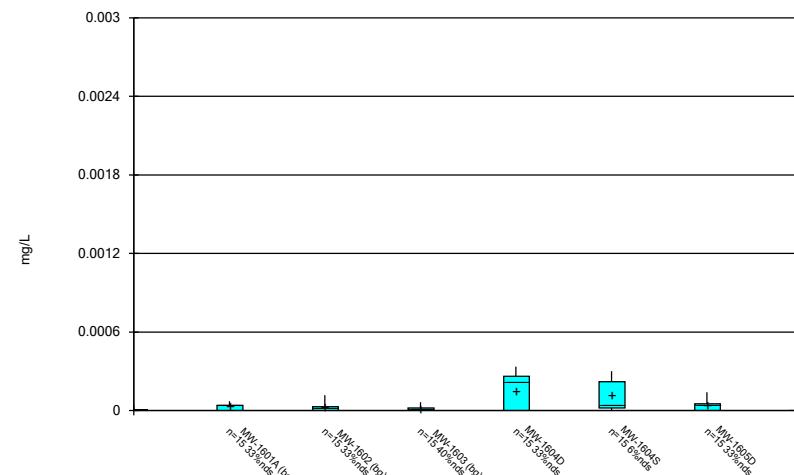
Constituent: Selenium, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot

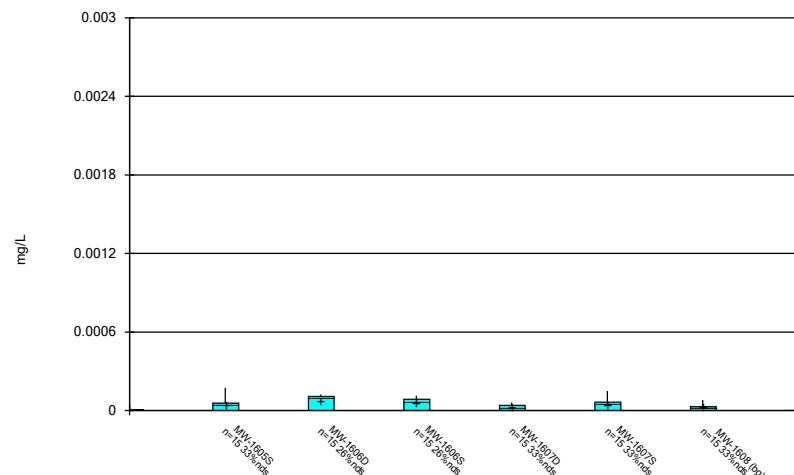


Constituent: Selenium, total Analysis Run 8/26/2020 7:55 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Box & Whiskers Plot



Box & Whiskers Plot



Outlier Report

Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP Printed 8/26/2020, 8:02 PM

MW-1607S Arsenic, total (mg/L) MW-1607S Barium, total (mg/L) MW-1601A Chromium, total (mg/L) MW-1602 Chromium, total (mg/L) MW-1603 Chromium, total (mg/L) MW-1604S Chromium, total (mg/L) MW-1605D Chromium, total (mg/L) MW-1605S Chromium, total (mg/L) MW-1607D Chromium, total (mg/L) MW-1607S Chromium, total (mg/L)

9/26/2016

9/27/2016

11/1/2016

0.0013 (o)

12/19/2016

0.00165 (o) 0.00237 (o)

12/20/2016

0.00197 (o) 0.00229 (o) 0.00285 (o) 0.00207 (o)

12/21/2016 0.0112 (o) 0.114 (o) 0.0031 (o)

4/18/2017

MW-1608 Chromium, total (mg/L) MW-1607S Cobalt, total (mg/L) MW-1604S Combined Radium 226 + 228 (pCi/L) MW-1606D Combined Radium 226 + 228 (pCi/L) MW-1606D Lead, total (mg/L) MW-1607S Lead, total (mg/L) MW-1607S Mercury, total (mg/L) MW-1604S Molybdenum, total (mg/L)

9/26/2016 0.136 (o) 0.0032 (o)

9/27/2016

8.459 (o)

11/1/2016

12/19/2016 0.00278 (o)

12/20/2016

12/21/2016 0.0201 (o) 0.011 (o) 1.2E-05 (o)

4/18/2017

0.00204 (o)

Upper Tolerance Limits

Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP Printed 8/28/2020, 1:24 PM

| <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 | 0.00010 | n/a | n/a | n/a | 60 | 16.67 | n/a | 0.04607 | NP Inter(normal...) |
| Arsenic, total (mg/L) | n/a | 0.00074 | n/a | n/a | n/a | 60 | 0 | sqrt(x) | 0.05 | Inter |
| Barium, total (mg/L) | n/a | 0.068 | n/a | n/a | n/a | 60 | 0 | n/a | 0.04607 | NP Inter(normal...) |
| Beryllium, total (mg/L) | n/a | 0.00010 | n/a | n/a | n/a | 56 | 87.5 | n/a | 0.05656 | NP Inter(NDs) |
| Cadmium, total (mg/L) | n/a | 0.000030 | n/a | n/a | n/a | 60 | 10 | n/a | 0.04607 | NP Inter(normal...) |
| Chromium, total (mg/L) | n/a | 0.00076 | n/a | n/a | n/a | 56 | 1.786 | ln(x) | 0.05 | Inter |
| Cobalt, total (mg/L) | n/a | 0.00062 | n/a | n/a | n/a | 60 | 6.667 | ln(x) | 0.05 | Inter |
| Combined Radium 226 + 228 (pCi/L) | n/a | 2.3 | n/a | n/a | n/a | 60 | 0 | sqrt(x) | 0.05 | Inter |
| Fluoride, total (mg/L) | n/a | 0.29 | n/a | n/a | n/a | 64 | 0 | No | 0.05 | Inter |
| Lead, total (mg/L) | n/a | 0.00088 | n/a | n/a | n/a | 60 | 11.67 | n/a | 0.04607 | NP Inter(normal...) |
| Lithium, total (mg/L) | n/a | 0.025 | n/a | n/a | n/a | 60 | 10 | No | 0.05 | Inter |
| Mercury, total (mg/L) | n/a | 0.0000050 | n/a | n/a | n/a | 56 | 92.86 | n/a | 0.05656 | NP Inter(NDs) |
| Molybdenum, total (mg/L) | n/a | 0.0028 | n/a | n/a | n/a | 60 | 6.667 | sqrt(x) | 0.05 | Inter |
| Selenium, total (mg/L) | n/a | 0.0043 | n/a | n/a | n/a | 60 | 0 | n/a | 0.04607 | NP Inter(normal...) |
| Thallium, total (mg/L) | n/a | 0.00050 | n/a | n/a | n/a | 60 | 35 | n/a | 0.04607 | NP Inter(normal...) |

| MOUNTAINEER 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 | | 0.00074 | 0.01 |
| Barium, Total (mg/L) | 2 | | 0.068 | 2 |
| Beryllium, Total (mg/L) | 0.004 | | 0.0001 | 0.004 |
| Cadmium, Total (mg/L) | 0.005 | | 0.00003 | 0.005 |
| Chromium, Total (mg/L) | 0.1 | | 0.00076 | 0.1 |
| Cobalt, Total (mg/L) | n/a | 0.006 | 0.00062 | 0.006 |
| Combined Radium, Total (pCi/L) | 5 | | 2.3 | 5 |
| Fluoride, Total (mg/L) | 4 | | 0.29 | 4 |
| Lead, Total (mg/L) | 0.015 | | 0.00088 | 0.015 |
| Lithium, Total (mg/L) | n/a | 0.04 | 0.025 | 0.04 |
| Mercury, Total (mg/L) | 0.002 | | 0.000005 | 0.002 |
| Molybdenum, Total (mg/L) | n/a | 0.1 | 0.0028 | 0.1 |
| Selenium, Total (mg/L) | 0.05 | | 0.0043 | 0.05 |
| Thallium, Total (mg/L) | 0.002 | | 0.0005 | 0.002 |

*MCL = Maximum Contaminant Level

*CCR = Coal Combustion Residual

*GWPS = Groundwater Protection Standard

Confidence Intervals - Significant Results

Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP Printed 8/28/2020, 1:32 PM

| <u>Constituent</u> | <u>Well</u> | <u>Upper Lim.</u> | <u>Lower Lim.</u> | <u>Compliance</u> | <u>Sig.</u> | <u>N</u> | <u>%NDs</u> | <u>Transform</u> | <u>Alpha</u> | <u>Method</u> |
|-----------------------|-------------|-------------------|-------------------|-------------------|-------------|----------|-------------|------------------|--------------|---------------|
| Lithium, total (mg/L) | MW-1605D | 0.07771 | 0.05413 | 0.04 | Yes | 15 | 0 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1605S | 0.0753 | 0.05584 | 0.04 | Yes | 15 | 0 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1606D | 0.1228 | 0.09312 | 0.04 | Yes | 15 | 0 | x^2 | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1606S | 0.1142 | 0.08695 | 0.04 | Yes | 15 | 0 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1607D | 0.1013 | 0.07723 | 0.04 | Yes | 15 | 0 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1607S | 0.1123 | 0.09194 | 0.04 | Yes | 15 | 0 | No | 0.01 | Param. |

Confidence Intervals - All Results

Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP Printed 8/28/2020, 1:32 PM

| <u>Constituent</u> | <u>Well</u> | <u>Upper Lim.</u> | <u>Lower Lim.</u> | <u>Compliance</u> | <u>Sig.</u> | <u>N</u> | <u>%NDs</u> | <u>Transform</u> | <u>Alpha</u> | <u>Method</u> |
|-----------------------------------|-------------|-------------------|-------------------|-------------------|-------------|----------|-------------|------------------|--------------|------------------|
| Antimony, total (mg/L) | MW-1604D | 0.00014 | 0.00003 | 0.006 | No | 15 | 6.667 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW-1604S | 0.00015 | 0.00003 | 0.006 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW-1605D | 0.00004 | 0.00003 | 0.006 | No | 15 | 6.667 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW-1605S | 0.00007 | 0.00004 | 0.006 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW-1606D | 0.00019 | 0.00014 | 0.006 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW-1606S | 0.0001575 | 0.0001398 | 0.006 | No | 15 | 0 | No | 0.01 | Param. |
| Antimony, total (mg/L) | MW-1607D | 0.00004 | 0.00003 | 0.006 | No | 15 | 6.667 | No | 0.01 | NP (normality) |
| Antimony, total (mg/L) | MW-1607S | 0.0005 | 0.00041 | 0.006 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Arsenic, total (mg/L) | MW-1604D | 0.0004863 | 0.000339 | 0.01 | No | 15 | 0 | No | 0.01 | Param. |
| Arsenic, total (mg/L) | MW-1604S | 0.0004424 | 0.0003402 | 0.01 | No | 15 | 0 | No | 0.01 | Param. |
| Arsenic, total (mg/L) | MW-1605D | 0.002652 | 0.00224 | 0.01 | No | 15 | 0 | No | 0.01 | Param. |
| Arsenic, total (mg/L) | MW-1605S | 0.0008662 | 0.0005607 | 0.01 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Arsenic, total (mg/L) | MW-1606D | 0.0006638 | 0.0003864 | 0.01 | No | 15 | 0 | ln(x) | 0.01 | Param. |
| Arsenic, total (mg/L) | MW-1606S | 0.0008439 | 0.0006974 | 0.01 | No | 15 | 0 | No | 0.01 | Param. |
| Arsenic, total (mg/L) | MW-1607D | 0.001378 | 0.001068 | 0.01 | No | 15 | 0 | No | 0.01 | Param. |
| Arsenic, total (mg/L) | MW-1607S | 0.0013 | 0.00092 | 0.01 | No | 14 | 0 | No | 0.01 | NP (normality) |
| Barium, total (mg/L) | MW-1604D | 0.0425 | 0.0279 | 2 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Barium, total (mg/L) | MW-1604S | 0.0294 | 0.0267 | 2 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Barium, total (mg/L) | MW-1605D | 0.02954 | 0.0257 | 2 | No | 15 | 0 | No | 0.01 | Param. |
| Barium, total (mg/L) | MW-1605S | 0.0359 | 0.02569 | 2 | No | 15 | 0 | No | 0.01 | Param. |
| Barium, total (mg/L) | MW-1606D | 0.05793 | 0.0494 | 2 | No | 15 | 0 | No | 0.01 | Param. |
| Barium, total (mg/L) | MW-1606S | 0.07441 | 0.06635 | 2 | No | 15 | 0 | No | 0.01 | Param. |
| Barium, total (mg/L) | MW-1607D | 0.1321 | 0.08605 | 2 | No | 15 | 0 | No | 0.01 | Param. |
| Barium, total (mg/L) | MW-1607S | 0.07281 | 0.06236 | 2 | No | 14 | 0 | No | 0.01 | Param. |
| Cadmium, total (mg/L) | MW-1604D | 0.00015 | 0.00003 | 0.005 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW-1604S | 0.00021 | 0.00003 | 0.005 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW-1605D | 0.00004 | 0.00001 | 0.005 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW-1605S | 0.00008153 | 0.0000498 | 0.005 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Cadmium, total (mg/L) | MW-1606D | 0.00007679 | 0.00006188 | 0.005 | No | 15 | 0 | No | 0.01 | Param. |
| Cadmium, total (mg/L) | MW-1606S | 0.00007784 | 0.00006616 | 0.005 | No | 15 | 0 | No | 0.01 | Param. |
| Cadmium, total (mg/L) | MW-1607D | 0.00003 | 0.00002 | 0.005 | No | 15 | 66.67 | No | 0.01 | NP (normality) |
| Cadmium, total (mg/L) | MW-1607S | 0.00006 | 0.00003 | 0.005 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Chromium, total (mg/L) | MW-1604D | 0.0004814 | 0.0002058 | 0.1 | No | 15 | 0 | No | 0.01 | Param. |
| Chromium, total (mg/L) | MW-1604S | 0.0002823 | 0.000112 | 0.1 | No | 14 | 0 | ln(x) | 0.01 | Param. |
| Chromium, total (mg/L) | MW-1605D | 0.000229 | 0.00007653 | 0.1 | No | 14 | 0 | sqrt(x) | 0.01 | Param. |
| Chromium, total (mg/L) | MW-1605S | 0.0005047 | 0.0002122 | 0.1 | No | 14 | 0 | No | 0.01 | Param. |
| Chromium, total (mg/L) | MW-1606D | 0.0004075 | 0.0001311 | 0.1 | No | 15 | 0 | ln(x) | 0.01 | Param. |
| Chromium, total (mg/L) | MW-1606S | 0.0003306 | 0.0000952 | 0.1 | No | 15 | 0 | ln(x) | 0.01 | Param. |
| Chromium, total (mg/L) | MW-1607D | 0.0002451 | 0.00007562 | 0.1 | No | 14 | 0 | ln(x) | 0.01 | Param. |
| Chromium, total (mg/L) | MW-1607S | 0.0004683 | 0.0002164 | 0.1 | No | 14 | 0 | No | 0.01 | Param. |
| Cobalt, total (mg/L) | MW-1604D | 0.00185 | 0.000181 | 0.006 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Cobalt, total (mg/L) | MW-1604S | 0.00214 | 0.000308 | 0.006 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Cobalt, total (mg/L) | MW-1605D | 0.001787 | 0.0001611 | 0.006 | No | 15 | 0 | No | 0.01 | Param. |
| Cobalt, total (mg/L) | MW-1605S | 0.001067 | 0.0003993 | 0.006 | No | 15 | 0 | x^(1/3) | 0.01 | Param. |
| Cobalt, total (mg/L) | MW-1606D | 0.00192 | 0.000111 | 0.006 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Cobalt, total (mg/L) | MW-1606S | 0.0003695 | 0.0002575 | 0.006 | No | 15 | 0 | No | 0.01 | Param. |
| Cobalt, total (mg/L) | MW-1607D | 0.000846 | 0.000414 | 0.006 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Cobalt, total (mg/L) | MW-1607S | 0.00142 | 0.000851 | 0.006 | No | 14 | 0 | No | 0.01 | NP (normality) |
| Combined Radium 226 + 228 (pCi/L) | MW-1604D | 1.418 | 0.4796 | 5 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW-1604S | 1.438 | 0.7428 | 5 | No | 14 | 0 | sqrt(x) | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW-1605D | 1.54 | 0.5881 | 5 | No | 15 | 0 | x^(1/3) | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW-1605S | 0.842 | 0.347 | 5 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Combined Radium 226 + 228 (pCi/L) | MW-1606D | 1.975 | 0.8706 | 5 | No | 14 | 0 | x^(1/3) | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW-1606S | 1.562 | 0.621 | 5 | No | 15 | 0 | No | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW-1607D | 2.036 | 1.072 | 5 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Combined Radium 226 + 228 (pCi/L) | MW-1607S | 2.061 | 0.9794 | 5 | No | 15 | 0 | No | 0.01 | Param. |
| Fluoride, total (mg/L) | MW-1604D | 0.2067 | 0.172 | 4 | No | 16 | 0 | No | 0.01 | Param. |
| Fluoride, total (mg/L) | MW-1604S | 0.2199 | 0.1926 | 4 | No | 16 | 0 | No | 0.01 | Param. |
| Fluoride, total (mg/L) | MW-1605D | 0.2071 | 0.1829 | 4 | No | 16 | 0 | No | 0.01 | Param. |
| Fluoride, total (mg/L) | MW-1605S | 0.2847 | 0.2415 | 4 | No | 16 | 0 | No | 0.01 | Param. |
| Fluoride, total (mg/L) | MW-1606D | 0.27 | 0.24 | 4 | No | 16 | 0 | No | 0.01 | NP (normality) |
| Fluoride, total (mg/L) | MW-1606S | 0.4858 | 0.3946 | 4 | No | 17 | 0 | x^2 | 0.01 | Param. |
| Fluoride, total (mg/L) | MW-1607D | 0.5373 | 0.4721 | 4 | No | 17 | 0 | No | 0.01 | Param. |
| Fluoride, total (mg/L) | MW-1607S | 0.2996 | 0.2541 | 4 | No | 16 | 0 | No | 0.01 | Param. |
| Lead, total (mg/L) | MW-1604D | 0.000303 | 0.000022 | 0.015 | No | 15 | 26.67 | No | 0.01 | NP (Cohens/xfrm) |
| Lead, total (mg/L) | MW-1604S | 0.0002 | 0.000034 | 0.015 | No | 15 | 33.33 | No | 0.01 | NP (Cohens/xfrm) |
| Lead, total (mg/L) | MW-1605D | 0.0002 | 0.00001 | 0.015 | No | 15 | 26.67 | No | 0.01 | NP (normality) |
| Lead, total (mg/L) | MW-1605S | 0.0006277 | 0.0001621 | 0.015 | No | 15 | 6.667 | x^(1/3) | 0.01 | Param. |

Confidence Intervals - All Results

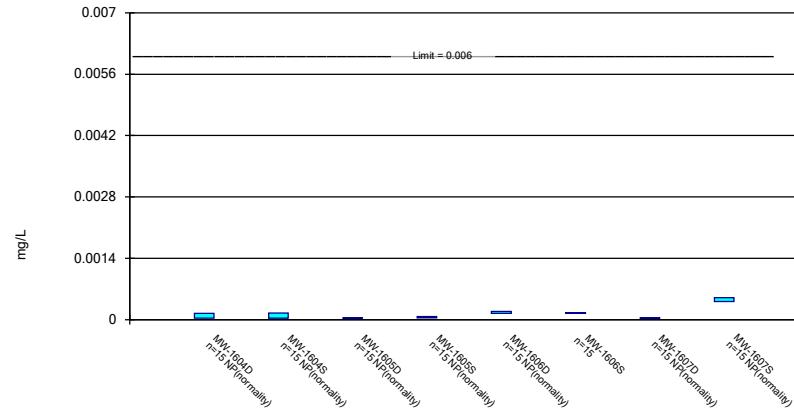
Page 2

Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP Printed 8/28/2020, 1:32 PM

| <u>Constituent</u> | <u>Well</u> | <u>Upper Lim.</u> | <u>Lower Lim.</u> | <u>Compliance</u> | <u>Sig.</u> | <u>N</u> | <u>%NDs</u> | <u>Transform</u> | <u>Alpha</u> | <u>Method</u> |
|--------------------------|-----------------|-------------------|-------------------|-------------------|-------------|-----------|-------------|------------------|--------------|------------------|
| Lead, total (mg/L) | MW-1606D | 0.000491 | 0.000082 | 0.015 | No | 14 | 28.57 | No | 0.01 | NP (Cohens/xfrm) |
| Lead, total (mg/L) | MW-1606S | 0.0001613 | 0.00006921 | 0.015 | No | 15 | 13.33 | No | 0.01 | Param. |
| Lead, total (mg/L) | MW-1607D | 0.0002 | 0.000041 | 0.015 | No | 15 | 13.33 | No | 0.01 | NP (normality) |
| Lead, total (mg/L) | MW-1607S | 0.000267 | 0.00009 | 0.015 | No | 14 | 0 | No | 0.01 | NP (normality) |
| Lithium, total (mg/L) | MW-1604D | 0.05284 | 0.03047 | 0.04 | No | 15 | 6.667 | x^2 | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1604S | 0.04673 | 0.03373 | 0.04 | No | 15 | 0 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1605D | 0.07771 | 0.05413 | 0.04 | Yes | 15 | 0 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1605S | 0.0753 | 0.05584 | 0.04 | Yes | 15 | 0 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1606D | 0.1228 | 0.09312 | 0.04 | Yes | 15 | 0 | x^2 | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1606S | 0.1142 | 0.08695 | 0.04 | Yes | 15 | 0 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1607D | 0.1013 | 0.07723 | 0.04 | Yes | 15 | 0 | No | 0.01 | Param. |
| Lithium, total (mg/L) | MW-1607S | 0.1123 | 0.09194 | 0.04 | Yes | 15 | 0 | No | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW-1604D | 0.0198 | 0.001 | 0.1 | No | 15 | 6.667 | No | 0.01 | NP (normality) |
| Molybdenum, total (mg/L) | MW-1604S | 0.0163 | 0.00252 | 0.1 | No | 14 | 0 | No | 0.01 | NP (normality) |
| Molybdenum, total (mg/L) | MW-1605D | 0.04924 | 0.04009 | 0.1 | No | 15 | 0 | No | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW-1605S | 0.0203 | 0.01466 | 0.1 | No | 15 | 0 | No | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW-1606D | 0.07752 | 0.06885 | 0.1 | No | 15 | 0 | No | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW-1606S | 0.09517 | 0.06703 | 0.1 | No | 15 | 0 | No | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW-1607D | 0.08915 | 0.08224 | 0.1 | No | 15 | 0 | No | 0.01 | Param. |
| Molybdenum, total (mg/L) | MW-1607S | 0.04547 | 0.03823 | 0.1 | No | 15 | 0 | No | 0.01 | Param. |
| Selenium, total (mg/L) | MW-1604D | 0.0031 | 0.0007 | 0.05 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Selenium, total (mg/L) | MW-1604S | 0.002257 | 0.001236 | 0.05 | No | 15 | 0 | No | 0.01 | Param. |
| Selenium, total (mg/L) | MW-1605D | 0.0003 | 0.0002 | 0.05 | No | 15 | 0 | No | 0.01 | NP (normality) |
| Selenium, total (mg/L) | MW-1605S | 0.001526 | 0.0007164 | 0.05 | No | 15 | 0 | sqrt(x) | 0.01 | Param. |
| Selenium, total (mg/L) | MW-1606D | 0.006 | 0.0022 | 0.05 | No | 15 | 0 | No | 0.01 | Param. |
| Selenium, total (mg/L) | MW-1606S | 0.002242 | 0.0009155 | 0.05 | No | 15 | 0 | ln(x) | 0.01 | Param. |
| Selenium, total (mg/L) | MW-1607D | 0.00009 | 0.00003 | 0.05 | No | 15 | 13.33 | No | 0.01 | NP (normality) |
| Selenium, total (mg/L) | MW-1607S | 0.009157 | 0.006363 | 0.05 | No | 15 | 0 | No | 0.01 | Param. |
| Thallium, total (mg/L) | MW-1604D | 0.0005 | 0.000217 | 0.002 | No | 15 | 33.33 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW-1604S | 0.0003 | 0.00002 | 0.002 | No | 15 | 6.667 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW-1605D | 0.0005 | 0.00004 | 0.002 | No | 15 | 33.33 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW-1605S | 0.0005 | 0.00004 | 0.002 | No | 15 | 33.33 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW-1606D | 0.0005 | 0.000092 | 0.002 | No | 15 | 26.67 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW-1606S | 0.0005 | 0.000063 | 0.002 | No | 15 | 26.67 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW-1607D | 0.0005 | 0.00002 | 0.002 | No | 15 | 33.33 | No | 0.01 | NP (normality) |
| Thallium, total (mg/L) | MW-1607S | 0.0005 | 0.00005 | 0.002 | No | 15 | 33.33 | No | 0.01 | NP (normality) |

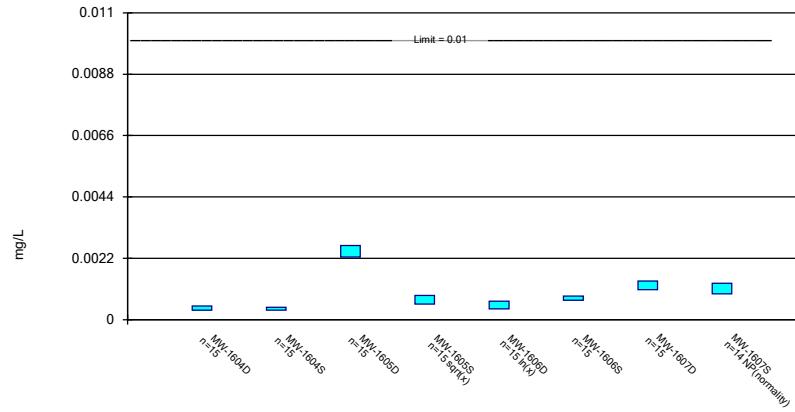
Parametric and Non-Parametric (NP) Confidence Interval

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



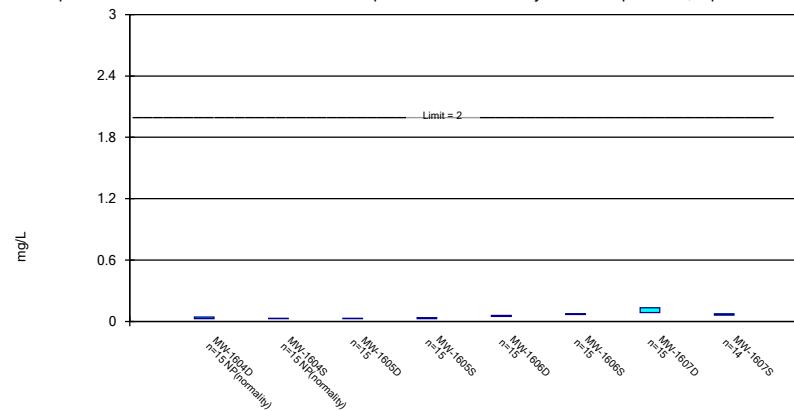
Parametric and Non-Parametric (NP) Confidence Interval

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



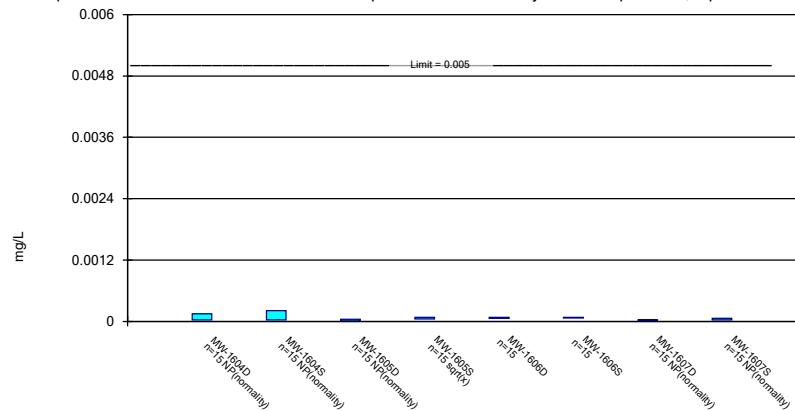
Parametric and Non-Parametric (NP) Confidence Interval

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



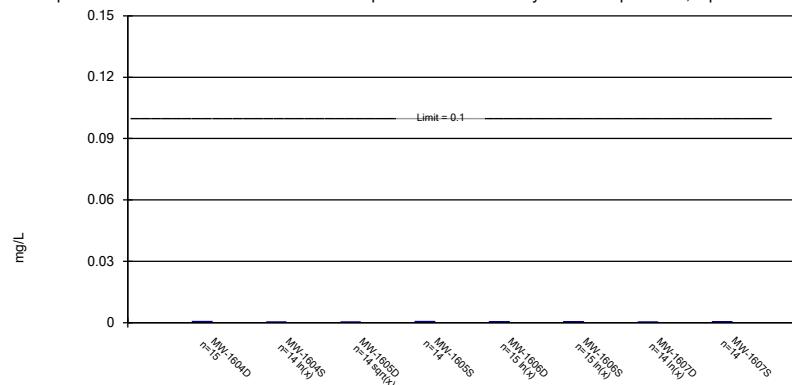
Parametric and Non-Parametric (NP) Confidence Interval

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



Parametric Confidence Interval

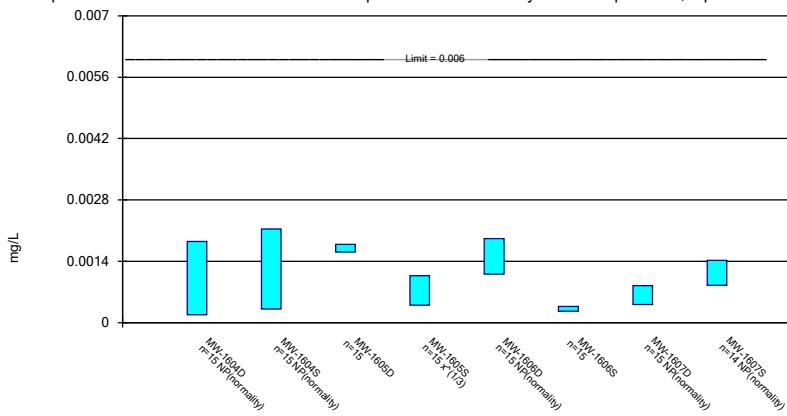
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Chromium, total Analysis Run 8/28/2020 1:30 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Parametric and Non-Parametric (NP) Confidence Interval

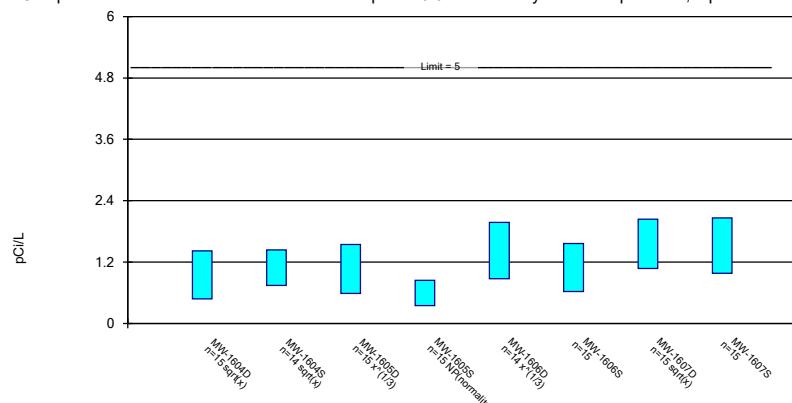
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Cobalt, total Analysis Run 8/28/2020 1:30 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Parametric and Non-Parametric (NP) Confidence Interval

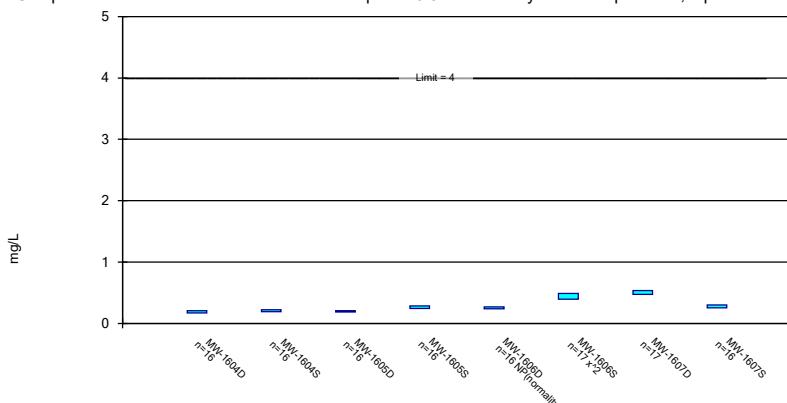
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Combined Radium 226 + 228 Analysis Run 8/28/2020 1:30 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Parametric and Non-Parametric (NP) Confidence Interval

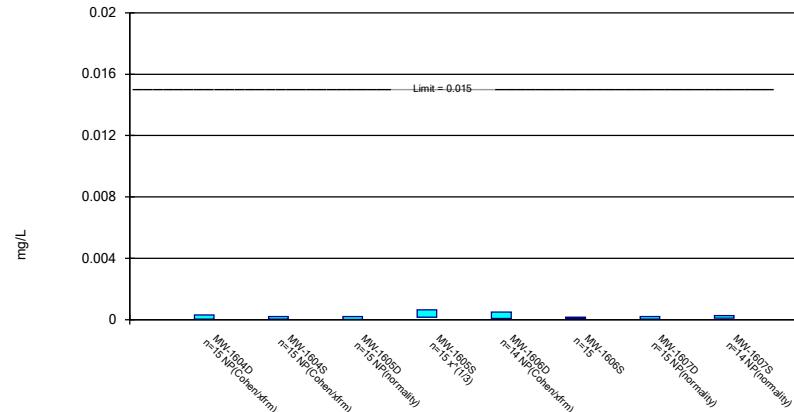
Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.



Constituent: Fluoride, total Analysis Run 8/28/2020 1:30 PM
Mountaineer BAP Client: Geosyntec Data: Mountaineer 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.

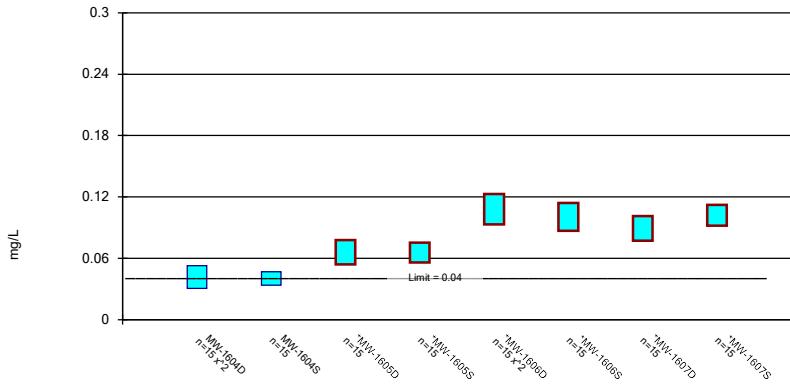


Constituent: Lead, total Analysis Run 8/28/2020 1:31 PM

Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Parametric Confidence Interval

Compliance limit is exceeded.* Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

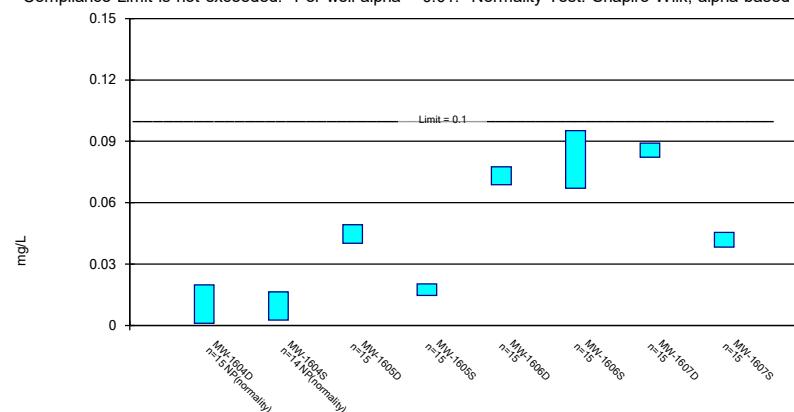


Constituent: Lithium, total Analysis Run 8/28/2020 1:31 PM

Mountaineer BAP Client: Geosyntec Data: Mountaineer 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.

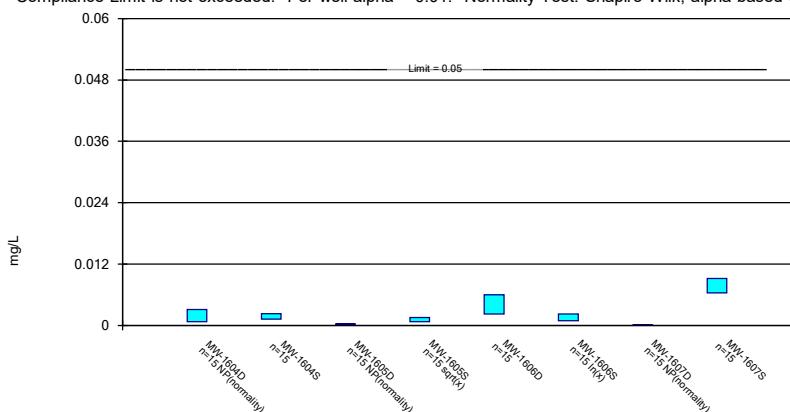


Constituent: Molybdenum, total Analysis Run 8/28/2020 1:31 PM

Mountaineer BAP Client: Geosyntec Data: Mountaineer 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.

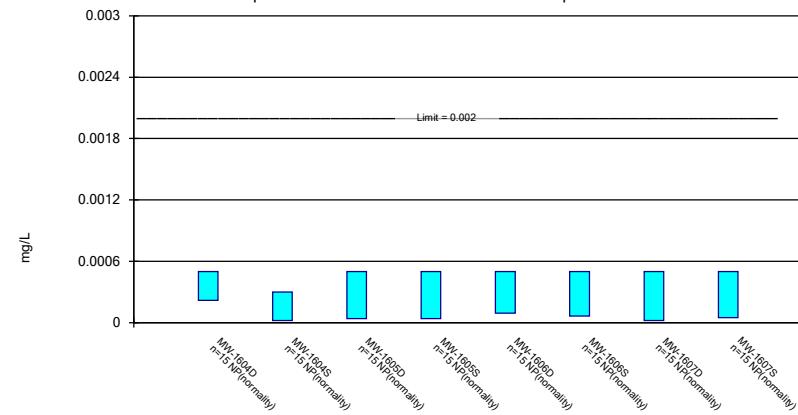


Constituent: Selenium, total Analysis Run 8/28/2020 1:31 PM

Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Non-Parametric Confidence Interval

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



Constituent: Thallium, total Analysis Run 8/28/2020 1:31 PM

Mountaineer BAP Client: Geosyntec Data: Mountaineer BAP

Appendix 3

No alternative source demonstrations were completed in 2020.

Appendix 4

The notifications of an SSL above a GWPS that were posted in 2020, as determined by statistical analysis following each assessment monitoring event, and the notice of initiation the assessment monitoring program and subsequently the Assessment of Corrective Measures program follow.

Mountaineer Plant

Notice of Assessment Monitoring Program Establishment

Bottom Ash Pond

On January 15, 2018, it was determined that Mountaineer Plant's Bottom Ash Pond had statistically significant increases over background for Boron, Calcium, Chloride, Fluoride, Sulfate, and Total Dissolved Solids (TDS). An alternative source demonstration was not successful within the 90 day period as allowed for in 257.94(e)(2) prompting the initiation of an assessment monitoring program, which was established on April 13, 2018. Therefore this notice is being placed in the operating record in accordance with the requirement of 257.94(e)(3).

Mountaineer Plant

Notice for Initiating an Assessment of Corrective Measures

CCR Unit – Bottom Ash Pond

This notice is being provided, as required by 40 CFR 257.95(g)(5), that an Assessment of Corrective Measures was initiated on March 26, 2019 for Mountaineer Plant's Bottom Ash Pond due to the statistically significant concentrations detected above the established groundwater protection standard for lithium.

Mountaineer Plant

Bottom Ash Pond

Assessment Monitoring - 257.105(h)(6) Results Operating Record Notice

Report Date: 9/30/2019 - 10/2/2019

| Sample Location | Parameters | Result | Reporting Units |
|-----------------|--------------------------|---------|-----------------|
| BAP-MW-107 | Antimony, Sb | 0.02J | ug/L |
| BAP-MW-107 | Arsenic, As | 0.44 | ug/L |
| BAP-MW-107 | Barium, Ba | 67.8 | ug/L |
| BAP-MW-107 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-107 | Boron, B | 0.696 | mg/L |
| BAP-MW-107 | Cadmium, Cd | 0.04J | ug/L |
| BAP-MW-107 | Calcium, Ca | 316 | mg/L |
| BAP-MW-107 | Chloride, Cl | 79.7 | mg/L |
| BAP-MW-107 | Chromium, Cr | 0.07J | ug/L |
| BAP-MW-107 | Cobalt, Co | 1.08 | ug/L |
| BAP-MW-107 | Combined Radium | 3.5 | pCi/L |
| BAP-MW-107 | Fluoride, F | 0.19 | mg/L |
| BAP-MW-107 | Lead, Pb | <0.05U | ug/L |
| BAP-MW-107 | Lithium, Li | 0.00358 | mg/L |
| BAP-MW-107 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-107 | Molybdenum, Mo | <0.4U | ug/L |
| BAP-MW-107 | pH | 7.1 | STD |
| BAP-MW-107 | Residue, Filterable, TDS | 1410 | mg/L |
| BAP-MW-107 | Selenium, Se | 0.8 | ug/L |
| BAP-MW-107 | Sulfate, SO4 | 631 | mg/L |
| BAP-MW-107 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1601A | Antimony, Sb | 0.03J | ug/L |
| BAP-MW-1601A | Arsenic, As | 0.62 | ug/L |
| BAP-MW-1601A | Barium, Ba | 65.3 | ug/L |
| BAP-MW-1601A | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1601A | Boron, B | 0.153 | mg/L |
| BAP-MW-1601A | Cadmium, Cd | 0.02J | ug/L |
| BAP-MW-1601A | Calcium, Ca | 164 | mg/L |
| BAP-MW-1601A | Chloride, Cl | 45.8 | mg/L |
| BAP-MW-1601A | Chromium, Cr | 0.370 | ug/L |
| BAP-MW-1601A | Cobalt, Co | 0.03J | ug/L |
| BAP-MW-1601A | Combined Radium | 1.168 | pCi/L |
| BAP-MW-1601A | Fluoride, F | 0.14 | mg/L |
| BAP-MW-1601A | Lead, Pb | <0.05U | ug/L |
| BAP-MW-1601A | Lithium, Li | 0.00184 | mg/L |
| BAP-MW-1601A | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1601A | Molybdenum, Mo | 0.9J | ug/L |
| BAP-MW-1601A | pH | 7 | STD |
| BAP-MW-1601A | Residue, Filterable, TDS | 749 | mg/L |
| BAP-MW-1601A | Selenium, Se | 1.1 | ug/L |
| BAP-MW-1601A | Sulfate, SO4 | 221 | mg/L |
| BAP-MW-1601A | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1602 | Antimony, Sb | <0.02U | ug/L |

Mountaineer Plant

Bottom Ash Pond

Assessment Monitoring - 257.105(h)(6) Results Operating Record Notice

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| BAP-MW-1602 | Arsenic, As | 0.31 | ug/L |
| BAP-MW-1602 | Barium, Ba | 27.3 | ug/L |
| BAP-MW-1602 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1602 | Boron, B | 0.111 | mg/L |
| BAP-MW-1602 | Cadmium, Cd | 0.01J | ug/L |
| BAP-MW-1602 | Calcium, Ca | 95.1 | mg/L |
| BAP-MW-1602 | Chloride, Cl | 10.4 | mg/L |
| BAP-MW-1602 | Chromium, Cr | 0.2J | ug/L |
| BAP-MW-1602 | Cobalt, Co | <0.02U | ug/L |
| BAP-MW-1602 | Combined Radium | 0.451 | pCi/L |
| BAP-MW-1602 | Fluoride, F | 0.21 | mg/L |
| BAP-MW-1602 | Lead, Pb | <0.05U | ug/L |
| BAP-MW-1602 | Lithium, Li | 0.00979 | mg/L |
| BAP-MW-1602 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1602 | Molybdenum, Mo | 1J | ug/L |
| BAP-MW-1602 | pH | 6.7 | STD |
| BAP-MW-1602 | Residue, Filterable, TDS | 603 | mg/L |
| BAP-MW-1602 | Selenium, Se | 0.1J | ug/L |
| BAP-MW-1602 | Sulfate, SO4 | 259 | mg/L |
| BAP-MW-1602 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1603 | Antimony, Sb | 0.03J | ug/L |
| BAP-MW-1603 | Arsenic, As | 0.35 | ug/L |
| BAP-MW-1603 | Barium, Ba | 30.9 | ug/L |
| BAP-MW-1603 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1603 | Boron, B | 0.308 | mg/L |
| BAP-MW-1603 | Cadmium, Cd | 0.01J | ug/L |
| BAP-MW-1603 | Calcium, Ca | 156 | mg/L |
| BAP-MW-1603 | Chloride, Cl | 10.0 | mg/L |
| BAP-MW-1603 | Chromium, Cr | 0.205 | ug/L |
| BAP-MW-1603 | Cobalt, Co | 0.112 | ug/L |
| BAP-MW-1603 | Combined Radium | 1.07 | pCi/L |
| BAP-MW-1603 | Fluoride, F | 0.09 | mg/L |
| BAP-MW-1603 | Lead, Pb | 0.1J | ug/L |
| BAP-MW-1603 | Lithium, Li | 0.0150 | mg/L |
| BAP-MW-1603 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1603 | Molybdenum, Mo | 0.5J | ug/L |
| BAP-MW-1603 | pH | 6.7 | STD |
| BAP-MW-1603 | Residue, Filterable, TDS | 853 | mg/L |
| BAP-MW-1603 | Selenium, Se | 0.2 | ug/L |
| BAP-MW-1603 | Sulfate, SO4 | 421 | mg/L |
| BAP-MW-1603 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1604D | Antimony, Sb | 0.03J | ug/L |
| BAP-MW-1604D | Arsenic, As | 0.30 | ug/L |

Mountaineer Plant

Bottom Ash Pond

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| BAP-MW-1604D | Barium, Ba | 55.6 | ug/L |
| BAP-MW-1604D | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1604D | Boron, B | 2.18 | mg/L |
| BAP-MW-1604D | Cadmium, Cd | 0.03J | ug/L |
| BAP-MW-1604D | Calcium, Ca | 217 | mg/L |
| BAP-MW-1604D | Chloride, Cl | 82.2 | mg/L |
| BAP-MW-1604D | Chromium, Cr | 0.345 | ug/L |
| BAP-MW-1604D | Cobalt, Co | 0.181 | ug/L |
| BAP-MW-1604D | Combined Radium | 0.464 | pCi/L |
| BAP-MW-1604D | Fluoride, F | 0.17 | mg/L |
| BAP-MW-1604D | Lead, Pb | <0.05U | ug/L |
| BAP-MW-1604D | Lithium, Li | 0.0188 | mg/L |
| BAP-MW-1604D | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1604D | Molybdenum, Mo | 2J | ug/L |
| BAP-MW-1604D | pH | 7 | STD |
| BAP-MW-1604D | Residue, Filterable, TDS | 1210 | mg/L |
| BAP-MW-1604D | Selenium, Se | 3.4 | ug/L |
| BAP-MW-1604D | Sulfate, SO4 | 551 | mg/L |
| BAP-MW-1604D | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1604S | Antimony, Sb | 0.14 | ug/L |
| BAP-MW-1604S | Arsenic, As | 0.34 | ug/L |
| BAP-MW-1604S | Barium, Ba | 29.0 | ug/L |
| BAP-MW-1604S | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1604S | Boron, B | 3.23 | mg/L |
| BAP-MW-1604S | Cadmium, Cd | 0.21 | ug/L |
| BAP-MW-1604S | Calcium, Ca | 267 | mg/L |
| BAP-MW-1604S | Chloride, Cl | 128 | mg/L |
| BAP-MW-1604S | Chromium, Cr | 0.1J | ug/L |
| BAP-MW-1604S | Cobalt, Co | 2.14 | ug/L |
| BAP-MW-1604S | Combined Radium | 1.15 | pCi/L |
| BAP-MW-1604S | Fluoride, F | 0.20 | mg/L |
| BAP-MW-1604S | Lead, Pb | <0.05U | ug/L |
| BAP-MW-1604S | Lithium, Li | 0.0476 | mg/L |
| BAP-MW-1604S | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1604S | Molybdenum, Mo | 16.3 | ug/L |
| BAP-MW-1604S | pH | 7.3 | STD |
| BAP-MW-1604S | Residue, Filterable, TDS | 1520 | mg/L |
| BAP-MW-1604S | Selenium, Se | 1.0 | ug/L |
| BAP-MW-1604S | Sulfate, SO4 | 770 | mg/L |
| BAP-MW-1604S | Thallium, Tl | 0.3J | ug/L |
| BAP-MW-1605D | Antimony, Sb | 0.03J | ug/L |
| BAP-MW-1605D | Arsenic, As | 2.78 | ug/L |
| BAP-MW-1605D | Barium, Ba | 33.1 | ug/L |

Mountaineer Plant

Bottom Ash Pond

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| BAP-MW-1605D | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1605D | Boron, B | 8.57 | mg/L |
| BAP-MW-1605D | Cadmium, Cd | 0.03J | ug/L |
| BAP-MW-1605D | Calcium, Ca | 283 | mg/L |
| BAP-MW-1605D | Chloride, Cl | 168 | mg/L |
| BAP-MW-1605D | Chromium, Cr | 0.04J | ug/L |
| BAP-MW-1605D | Cobalt, Co | 1.69 | ug/L |
| BAP-MW-1605D | Combined Radium | 1.641 | pCi/L |
| BAP-MW-1605D | Fluoride, F | 0.17 | mg/L |
| BAP-MW-1605D | Lead, Pb | <0.05U | ug/L |
| BAP-MW-1605D | Lithium, Li | 0.0561 | mg/L |
| BAP-MW-1605D | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1605D | Molybdenum, Mo | 39.7 | ug/L |
| BAP-MW-1605D | pH | 7.2 | STD |
| BAP-MW-1605D | Residue, Filterable, TDS | 2050 | mg/L |
| BAP-MW-1605D | Selenium, Se | 0.3 | ug/L |
| BAP-MW-1605D | Sulfate, SO4 | 974 | mg/L |
| BAP-MW-1605D | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1605S | Antimony, Sb | 0.04J | ug/L |
| BAP-MW-1605S | Arsenic, As | 0.59 | ug/L |
| BAP-MW-1605S | Barium, Ba | 29.6 | ug/L |
| BAP-MW-1605S | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1605S | Boron, B | 8.05 | mg/L |
| BAP-MW-1605S | Cadmium, Cd | 0.05J | ug/L |
| BAP-MW-1605S | Calcium, Ca | 174 | mg/L |
| BAP-MW-1605S | Chloride, Cl | 149 | mg/L |
| BAP-MW-1605S | Chromium, Cr | 0.237 | ug/L |
| BAP-MW-1605S | Cobalt, Co | 0.379 | ug/L |
| BAP-MW-1605S | Combined Radium | 0.542 | pCi/L |
| BAP-MW-1605S | Fluoride, F | 0.26 | mg/L |
| BAP-MW-1605S | Lead, Pb | 0.202 | ug/L |
| BAP-MW-1605S | Lithium, Li | 0.0524 | mg/L |
| BAP-MW-1605S | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1605S | Molybdenum, Mo | 14.2 | ug/L |
| BAP-MW-1605S | pH | 7.2 | STD |
| BAP-MW-1605S | Residue, Filterable, TDS | 1470 | mg/L |
| BAP-MW-1605S | Selenium, Se | 0.4 | ug/L |
| BAP-MW-1605S | Sulfate, SO4 | 694 | mg/L |
| BAP-MW-1605S | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1606D | Antimony, Sb | 0.15 | ug/L |
| BAP-MW-1606D | Arsenic, As | 0.40 | ug/L |
| BAP-MW-1606D | Barium, Ba | 51.4 | ug/L |
| BAP-MW-1606D | Beryllium, Be | <0.02U | ug/L |

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| BAP-MW-1606D | Boron, B | 6.38 | mg/L |
| BAP-MW-1606D | Cadmium, Cd | 0.08 | ug/L |
| BAP-MW-1606D | Calcium, Ca | 281 | mg/L |
| BAP-MW-1606D | Chloride, Cl | 244 | mg/L |
| BAP-MW-1606D | Chromium, Cr | 0.1J | ug/L |
| BAP-MW-1606D | Cobalt, Co | 1.09 | ug/L |
| BAP-MW-1606D | Combined Radium | 2.2714 | pCi/L |
| BAP-MW-1606D | Fluoride, F | 0.49 | mg/L |
| BAP-MW-1606D | Lead, Pb | <0.05U | ug/L |
| BAP-MW-1606D | Lithium, Li | 0.0835 | mg/L |
| BAP-MW-1606D | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1606D | Molybdenum, Mo | 68.5 | ug/L |
| BAP-MW-1606D | pH | 7.4 | STD |
| BAP-MW-1606D | Residue, Filterable, TDS | 1700 | mg/L |
| BAP-MW-1606D | Selenium, Se | 1.0 | ug/L |
| BAP-MW-1606D | Sulfate, SO4 | 588 | mg/L |
| BAP-MW-1606D | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1606S | Antimony, Sb | 0.13 | ug/L |
| BAP-MW-1606S | Arsenic, As | 0.67 | ug/L |
| BAP-MW-1606S | Barium, Ba | 70.4 | ug/L |
| BAP-MW-1606S | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1606S | Boron, B | 6.19 | mg/L |
| BAP-MW-1606S | Cadmium, Cd | 0.07 | ug/L |
| BAP-MW-1606S | Calcium, Ca | 229 | mg/L |
| BAP-MW-1606S | Chloride, Cl | 221 | mg/L |
| BAP-MW-1606S | Chromium, Cr | 0.08J | ug/L |
| BAP-MW-1606S | Cobalt, Co | 0.312 | ug/L |
| BAP-MW-1606S | Combined Radium | 2.682 | pCi/L |
| BAP-MW-1606S | Fluoride, F | 0.28 | mg/L |
| BAP-MW-1606S | Lead, Pb | <0.05U | ug/L |
| BAP-MW-1606S | Lithium, Li | 0.0877 | mg/L |
| BAP-MW-1606S | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1606S | Molybdenum, Mo | 54.9 | ug/L |
| BAP-MW-1606S | pH | 7.3 | STD |
| BAP-MW-1606S | Residue, Filterable, TDS | 1460 | mg/L |
| BAP-MW-1606S | Selenium, Se | 2.7 | ug/L |
| BAP-MW-1606S | Sulfate, SO4 | 705 | mg/L |
| BAP-MW-1606S | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1607D | Antimony, Sb | 0.03J | ug/L |
| BAP-MW-1607D | Arsenic, As | 1.53 | ug/L |
| BAP-MW-1607D | Barium, Ba | 79.3 | ug/L |
| BAP-MW-1607D | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1607D | Boron, B | 3.65 | mg/L |

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| BAP-MW-1607D | Cadmium, Cd | 0.01J | ug/L |
| BAP-MW-1607D | Calcium, Ca | 233 | mg/L |
| BAP-MW-1607D | Chloride, Cl | 174 | mg/L |
| BAP-MW-1607D | Chromium, Cr | 0.05J | ug/L |
| BAP-MW-1607D | Cobalt, Co | 0.848 | ug/L |
| BAP-MW-1607D | Combined Radium | 1.855 | pCi/L |
| BAP-MW-1607D | Fluoride, F | 0.56 | mg/L |
| BAP-MW-1607D | Lead, Pb | <0.05U | ug/L |
| BAP-MW-1607D | Lithium, Li | 0.110 | mg/L |
| BAP-MW-1607D | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1607D | Molybdenum, Mo | 82.1 | ug/L |
| BAP-MW-1607D | pH | 7.7 | STD |
| BAP-MW-1607D | Residue, Filterable, TDS | 1610 | mg/L |
| BAP-MW-1607D | Selenium, Se | 0.09J | ug/L |
| BAP-MW-1607D | Sulfate, SO4 | 699 | mg/L |
| BAP-MW-1607D | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1607S | Antimony, Sb | 0.41 | ug/L |
| BAP-MW-1607S | Arsenic, As | 0.87 | ug/L |
| BAP-MW-1607S | Barium, Ba | 67.7 | ug/L |
| BAP-MW-1607S | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1607S | Boron, B | 3.21 | mg/L |
| BAP-MW-1607S | Cadmium, Cd | 0.05J | ug/L |
| BAP-MW-1607S | Calcium, Ca | 198 | mg/L |
| BAP-MW-1607S | Chloride, Cl | 167 | mg/L |
| BAP-MW-1607S | Chromium, Cr | 0.357 | ug/L |
| BAP-MW-1607S | Cobalt, Co | 0.971 | ug/L |
| BAP-MW-1607S | Combined Radium | 2.765 | pCi/L |
| BAP-MW-1607S | Fluoride, F | 0.27 | mg/L |
| BAP-MW-1607S | Lead, Pb | 0.09J | ug/L |
| BAP-MW-1607S | Lithium, Li | 0.0990 | mg/L |
| BAP-MW-1607S | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1607S | Molybdenum, Mo | 35.0 | ug/L |
| BAP-MW-1607S | pH | 7.7 | STD |
| BAP-MW-1607S | Residue, Filterable, TDS | 1350 | mg/L |
| BAP-MW-1607S | Selenium, Se | 4.3 | ug/L |
| BAP-MW-1607S | Sulfate, SO4 | 465 | mg/L |
| BAP-MW-1607S | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1608 | Antimony, Sb | 0.03J | ug/L |
| BAP-MW-1608 | Arsenic, As | 0.52 | ug/L |
| BAP-MW-1608 | Barium, Ba | 26.8 | ug/L |
| BAP-MW-1608 | Beryllium, Be | 0.05J | ug/L |
| BAP-MW-1608 | Boron, B | 0.124 | mg/L |
| BAP-MW-1608 | Cadmium, Cd | < 0.01U | ug/L |

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| BAP-MW-1608 | Calcium, Ca | 92.0 | mg/L |
| BAP-MW-1608 | Chloride, Cl | 4.01 | mg/L |
| BAP-MW-1608 | Chromium, Cr | 0.327 | ug/L |
| BAP-MW-1608 | Cobalt, Co | 0.056 | ug/L |
| BAP-MW-1608 | Combined Radium | 1.348 | pCi/L |
| BAP-MW-1608 | Fluoride, F | 0.20 | mg/L |
| BAP-MW-1608 | Lead, Pb | 0.06J | ug/L |
| BAP-MW-1608 | Lithium, Li | 0.00286 | mg/L |
| BAP-MW-1608 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1608 | Molybdenum, Mo | 1J | ug/L |
| BAP-MW-1608 | pH | 7.1 | STD |
| BAP-MW-1608 | Residue, Filterable, TDS | 369 | mg/L |
| BAP-MW-1608 | Selenium, Se | 1.0 | ug/L |
| BAP-MW-1608 | Sulfate, SO4 | 109 | mg/L |
| BAP-MW-1608 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1805 | Antimony, Sb | 0.07J | ug/L |
| BAP-MW-1805 | Arsenic, As | 70.4 | ug/L |
| BAP-MW-1805 | Barium, Ba | 41.9 | ug/L |
| BAP-MW-1805 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1805 | Boron, B | 6.00 | mg/L |
| BAP-MW-1805 | Cadmium, Cd | <0.01U | ug/L |
| BAP-MW-1805 | Calcium, Ca | 273 | mg/L |
| BAP-MW-1805 | Chloride, Cl | 167 | mg/L |
| BAP-MW-1805 | Chromium, Cr | 0.415 | ug/L |
| BAP-MW-1805 | Cobalt, Co | 3.39 | ug/L |
| BAP-MW-1805 | Combined Radium | 2.7353 | pCi/L |
| BAP-MW-1805 | Fluoride, F | 0.24 | mg/L |
| BAP-MW-1805 | Lead, Pb | 0.1J | ug/L |
| BAP-MW-1805 | Lithium, Li | 0.0426 | mg/L |
| BAP-MW-1805 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1805 | Molybdenum, Mo | 78.0 | ug/L |
| BAP-MW-1805 | pH | 7.4 | STD |
| BAP-MW-1805 | Residue, Filterable, TDS | 1880 | mg/L |
| BAP-MW-1805 | Selenium, Se | 0.1J | ug/L |
| BAP-MW-1805 | Sulfate, SO4 | 908 | mg/L |
| BAP-MW-1805 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1921 | Antimony, Sb | 0.1J | ug/L |
| BAP-MW-1921 | Arsenic, As | 1.25 | ug/L |
| BAP-MW-1921 | Barium, Ba | 50.8 | ug/L |
| BAP-MW-1921 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1921 | Boron, B | 0.647 | mg/L |
| BAP-MW-1921 | Cadmium, Cd | 0.03J | ug/L |
| BAP-MW-1921 | Calcium, Ca | 79.6 | mg/L |

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Report Date: 9/30/2019 - 10/2/2019

| Sample Location | Parameters | Result | Reporting Units |
|-----------------|--------------------------|---------|-----------------|
| BAP-MW-1921 | Chloride, Cl | 33.2 | mg/L |
| BAP-MW-1921 | Chromium, Cr | 0.1J | ug/L |
| BAP-MW-1921 | Cobalt, Co | 0.692 | ug/L |
| BAP-MW-1921 | Combined Radium | 1.228 | pCi/L |
| BAP-MW-1921 | Fluoride, F | 0.79 | mg/L |
| BAP-MW-1921 | Lead, Pb | 0.08J | ug/L |
| BAP-MW-1921 | Lithium, Li | 0.0926 | mg/L |
| BAP-MW-1921 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1921 | Molybdenum, Mo | 500 | ug/L |
| BAP-MW-1921 | pH | 7.6 | STD |
| BAP-MW-1921 | Residue, Filterable, TDS | 438 | mg/L |
| BAP-MW-1921 | Selenium, Se | 0.1J | ug/L |
| BAP-MW-1921 | Sulfate, SO4 | 131 | mg/L |
| BAP-MW-1921 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1922D | Antimony, Sb | 1.04 | ug/L |
| BAP-MW-1922D | Arsenic, As | 839 | ug/L |
| BAP-MW-1922D | Barium, Ba | 51.0 | ug/L |
| BAP-MW-1922D | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1922D | Boron, B | 0.440 | mg/L |
| BAP-MW-1922D | Cadmium, Cd | 0.01J | ug/L |
| BAP-MW-1922D | Calcium, Ca | 96.5 | mg/L |
| BAP-MW-1922D | Chloride, Cl | 32.7 | mg/L |
| BAP-MW-1922D | Chromium, Cr | 0.08J | ug/L |
| BAP-MW-1922D | Cobalt, Co | 0.492 | ug/L |
| BAP-MW-1922D | Combined Radium | 3.089 | pCi/L |
| BAP-MW-1922D | Fluoride, F | 0.33 | mg/L |
| BAP-MW-1922D | Lead, Pb | <0.05U | ug/L |
| BAP-MW-1922D | Lithium, Li | 0.0126 | mg/L |
| BAP-MW-1922D | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1922D | Molybdenum, Mo | 478 | ug/L |
| BAP-MW-1922D | pH | 7.6 | STD |
| BAP-MW-1922D | Residue, Filterable, TDS | 566 | mg/L |
| BAP-MW-1922D | Selenium, Se | 0.06J | ug/L |
| BAP-MW-1922D | Sulfate, SO4 | 167 | mg/L |
| BAP-MW-1922D | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1922S | Antimony, Sb | 0.02J | ug/L |
| BAP-MW-1922S | Arsenic, As | 1.75 | ug/L |
| BAP-MW-1922S | Barium, Ba | 26.5 | ug/L |
| BAP-MW-1922S | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1922S | Boron, B | 6.34 | mg/L |
| BAP-MW-1922S | Cadmium, Cd | <0.01U | ug/L |
| BAP-MW-1922S | Calcium, Ca | 342 | mg/L |
| BAP-MW-1922S | Chloride, Cl | 179 | mg/L |

Mountaineer Plant

Bottom Ash Pond

Assessment Monitoring - 257.105(h)(6) Results Operating Record Notice

Report Date: 9/30/2019 - 10/2/2019

| Sample Location | Parameters | Result | Reporting Units |
|-----------------|--------------------------|---------|-----------------|
| BAP-MW-1922S | Chromium, Cr | 0.2J | ug/L |
| BAP-MW-1922S | Cobalt, Co | 1.23 | ug/L |
| BAP-MW-1922S | Combined Radium | 2.945 | pCi/L |
| BAP-MW-1922S | Fluoride, F | 0.19 | mg/L |
| BAP-MW-1922S | Lead, Pb | 0.1J | ug/L |
| BAP-MW-1922S | Lithium, Li | 0.0556 | mg/L |
| BAP-MW-1922S | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1922S | Molybdenum, Mo | 33.9 | ug/L |
| BAP-MW-1922S | pH | 7.3 | STD |
| BAP-MW-1922S | Residue, Filterable, TDS | 2060 | mg/L |
| BAP-MW-1922S | Selenium, Se | 0.08J | ug/L |
| BAP-MW-1922S | Sulfate, SO4 | 1070 | mg/L |
| BAP-MW-1922S | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1923 | Antimony, Sb | 0.24 | ug/L |
| BAP-MW-1923 | Arsenic, As | 0.75 | ug/L |
| BAP-MW-1923 | Barium, Ba | 86.6 | ug/L |
| BAP-MW-1923 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1923 | Boron, B | 0.756 | mg/L |
| BAP-MW-1923 | Cadmium, Cd | 0.03J | ug/L |
| BAP-MW-1923 | Calcium, Ca | 105 | mg/L |
| BAP-MW-1923 | Chloride, Cl | 38.3 | mg/L |
| BAP-MW-1923 | Chromium, Cr | 0.541 | ug/L |
| BAP-MW-1923 | Cobalt, Co | 1.01 | ug/L |
| BAP-MW-1923 | Combined Radium | 2.099 | pCi/L |
| BAP-MW-1923 | Fluoride, F | 0.13 | mg/L |
| BAP-MW-1923 | Lead, Pb | 0.543 | ug/L |
| BAP-MW-1923 | Lithium, Li | 0.137 | mg/L |
| BAP-MW-1923 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1923 | Molybdenum, Mo | 84.2 | ug/L |
| BAP-MW-1923 | pH | 6.8 | STD |
| BAP-MW-1923 | Residue, Filterable, TDS | 545 | mg/L |
| BAP-MW-1923 | Selenium, Se | 14.0 | ug/L |
| BAP-MW-1923 | Sulfate, SO4 | 159 | mg/L |
| BAP-MW-1923 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1924 | Antimony, Sb | 0.07J | ug/L |
| BAP-MW-1924 | Arsenic, As | 0.61 | ug/L |
| BAP-MW-1924 | Barium, Ba | 54.5 | ug/L |
| BAP-MW-1924 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1924 | Boron, B | 4.89 | mg/L |
| BAP-MW-1924 | Cadmium, Cd | 0.06 | ug/L |
| BAP-MW-1924 | Calcium, Ca | 238 | mg/L |
| BAP-MW-1924 | Chloride, Cl | 109 | mg/L |
| BAP-MW-1924 | Chromium, Cr | 0.2J | ug/L |

Mountaineer Plant

Bottom Ash Pond

Assessment Monitoring - 257.105(h)(6) Results Operating Record Notice

Report Date: 9/30/2019 - 10/2/2019

| Sample Location | Parameters | Result | Reporting Units |
|-----------------|--------------------------|---------|-----------------|
| BAP-MW-1924 | Cobalt, Co | 4.10 | ug/L |
| BAP-MW-1924 | Combined Radium | 1.719 | pCi/L |
| BAP-MW-1924 | Fluoride, F | 0.44 | mg/L |
| BAP-MW-1924 | Lead, Pb | 0.218 | ug/L |
| BAP-MW-1924 | Lithium, Li | 0.102 | mg/L |
| BAP-MW-1924 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1924 | Molybdenum, Mo | 76.7 | ug/L |
| BAP-MW-1924 | pH | 7.1 | STD |
| BAP-MW-1924 | Residue, Filterable, TDS | 1500 | mg/L |
| BAP-MW-1924 | Selenium, Se | 3.5 | ug/L |
| BAP-MW-1924 | Sulfate, SO4 | 662 | mg/L |
| BAP-MW-1924 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1925 | Antimony, Sb | 0.20 | ug/L |
| BAP-MW-1925 | Arsenic, As | 0.41 | ug/L |
| BAP-MW-1925 | Barium, Ba | 45.0 | ug/L |
| BAP-MW-1925 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1925 | Boron, B | 5.86 | mg/L |
| BAP-MW-1925 | Cadmium, Cd | 0.06 | ug/L |
| BAP-MW-1925 | Calcium, Ca | 249 | mg/L |
| BAP-MW-1925 | Chloride, Cl | 147 | mg/L |
| BAP-MW-1925 | Chromium, Cr | 0.1J | ug/L |
| BAP-MW-1925 | Cobalt, Co | 1.27 | ug/L |
| BAP-MW-1925 | Combined Radium | 1.041 | pCi/L |
| BAP-MW-1925 | Fluoride, F | 0.26 | mg/L |
| BAP-MW-1925 | Lead, Pb | 0.2J | ug/L |
| BAP-MW-1925 | Lithium, Li | 0.0947 | mg/L |
| BAP-MW-1925 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1925 | Molybdenum, Mo | 54.6 | ug/L |
| BAP-MW-1925 | pH | 7.2 | STD |
| BAP-MW-1925 | Residue, Filterable, TDS | 1500 | mg/L |
| BAP-MW-1925 | Selenium, Se | 4.1 | ug/L |
| BAP-MW-1925 | Sulfate, SO4 | 683 | mg/L |
| BAP-MW-1925 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1926 | Antimony, Sb | 0.07J | ug/L |
| BAP-MW-1926 | Arsenic, As | 0.37 | ug/L |
| BAP-MW-1926 | Barium, Ba | 23.9 | ug/L |
| BAP-MW-1926 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1926 | Boron, B | 0.145 | mg/L |
| BAP-MW-1926 | Cadmium, Cd | 0.06 | ug/L |
| BAP-MW-1926 | Calcium, Ca | 87.6 | mg/L |
| BAP-MW-1926 | Chloride, Cl | 8.57 | mg/L |
| BAP-MW-1926 | Chromium, Cr | 0.09J | ug/L |
| BAP-MW-1926 | Cobalt, Co | 1.17 | ug/L |

Mountaineer Plant

Bottom Ash Pond

Assessment Monitoring - 257.105(h)(6) Results Operating Record Notice

Report Date: 9/30/2019 - 10/2/2019

| Sample Location | Parameters | Result | Reporting Units |
|-----------------|--------------------------|---------|-----------------|
| BAP-MW-1926 | Combined Radium | 0.4608 | pCi/L |
| BAP-MW-1926 | Fluoride, F | 0.24 | mg/L |
| BAP-MW-1926 | Lead, Pb | 0.07J | ug/L |
| BAP-MW-1926 | Lithium, Li | 0.00624 | mg/L |
| BAP-MW-1926 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1926 | Molybdenum, Mo | 5.38 | ug/L |
| BAP-MW-1926 | pH | 7.3 | STD |
| BAP-MW-1926 | Residue, Filterable, TDS | 396 | mg/L |
| BAP-MW-1926 | Selenium, Se | 0.4 | ug/L |
| BAP-MW-1926 | Sulfate, SO4 | 26.4 | mg/L |
| BAP-MW-1926 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1927 | Antimony, Sb | 0.12 | ug/L |
| BAP-MW-1927 | Arsenic, As | 0.27 | ug/L |
| BAP-MW-1927 | Barium, Ba | 58.7 | ug/L |
| BAP-MW-1927 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1927 | Boron, B | 0.498 | mg/L |
| BAP-MW-1927 | Cadmium, Cd | 0.05 | ug/L |
| BAP-MW-1927 | Calcium, Ca | 143 | mg/L |
| BAP-MW-1927 | Chloride, Cl | 15.2 | mg/L |
| BAP-MW-1927 | Chromium, Cr | 0.08J | ug/L |
| BAP-MW-1927 | Cobalt, Co | 0.225 | ug/L |
| BAP-MW-1927 | Combined Radium | 1.415 | pCi/L |
| BAP-MW-1927 | Fluoride, F | 0.14 | mg/L |
| BAP-MW-1927 | Lead, Pb | <0.05U | ug/L |
| BAP-MW-1927 | Lithium, Li | 0.00638 | mg/L |
| BAP-MW-1927 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1927 | Molybdenum, Mo | 2J | ug/L |
| BAP-MW-1927 | pH | 7 | STD |
| BAP-MW-1927 | Residue, Filterable, TDS | 839 | mg/L |
| BAP-MW-1927 | Selenium, Se | 0.4 | ug/L |
| BAP-MW-1927 | Sulfate, SO4 | 306 | mg/L |
| BAP-MW-1927 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-1929 | Antimony, Sb | 0.03J | ug/L |
| BAP-MW-1929 | Arsenic, As | 0.47 | ug/L |
| BAP-MW-1929 | Barium, Ba | 52.1 | ug/L |
| BAP-MW-1929 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-1929 | Boron, B | 0.236 | mg/L |
| BAP-MW-1929 | Cadmium, Cd | 0.01J | ug/L |
| BAP-MW-1929 | Calcium, Ca | 113 | mg/L |
| BAP-MW-1929 | Chloride, Cl | 15.1 | mg/L |
| BAP-MW-1929 | Chromium, Cr | 0.280 | ug/L |
| BAP-MW-1929 | Cobalt, Co | 0.606 | ug/L |
| BAP-MW-1929 | Combined Radium | 2.994 | pCi/L |

| Mountaineer Plant | | | |
|---|--------------------------|---------|-----------------|
| Bottom Ash Pond | | | |
| Assessment Monitoring - 257.105(h)(6) Results Operating Record Notice | | | |
| Report Date: 9/30/2019 - 10/2/2019 | | | |
| Sample Location | Parameters | Result | Reporting Units |
| BAP-MW-1929 | Fluoride, F | 0.19 | mg/L |
| BAP-MW-1929 | Lead, Pb | 0.274 | ug/L |
| BAP-MW-1929 | Lithium, Li | 0.00480 | mg/L |
| BAP-MW-1929 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-1929 | Molybdenum, Mo | 0.7J | ug/L |
| BAP-MW-1929 | pH | 7.6 | STD |
| BAP-MW-1929 | Residue, Filterable, TDS | 528 | mg/L |
| BAP-MW-1929 | Selenium, Se | 1.7 | ug/L |
| BAP-MW-1929 | Sulfate, SO4 | 234 | mg/L |
| BAP-MW-1929 | Thallium, Tl | <0.1U | ug/L |
| BAP-MW-203 | Antimony, Sb | 0.02J | ug/L |
| BAP-MW-203 | Arsenic, As | 0.33 | ug/L |
| BAP-MW-203 | Barium, Ba | 31.6 | ug/L |
| BAP-MW-203 | Beryllium, Be | <0.02U | ug/L |
| BAP-MW-203 | Boron, B | 0.104 | mg/L |
| BAP-MW-203 | Cadmium, Cd | <0.01U | ug/L |
| BAP-MW-203 | Calcium, Ca | 106 | mg/L |
| BAP-MW-203 | Chloride, Cl | 10.1 | mg/L |
| BAP-MW-203 | Chromium, Cr | 0.2J | ug/L |
| BAP-MW-203 | Cobalt, Co | 0.139 | ug/L |
| BAP-MW-203 | Combined Radium | 0.381 | pCi/L |
| BAP-MW-203 | Fluoride, F | 0.22 | mg/L |
| BAP-MW-203 | Lead, Pb | 0.2J | ug/L |
| BAP-MW-203 | Lithium, Li | 0.00230 | mg/L |
| BAP-MW-203 | Mercury, Hg | <0.002U | ug/L |
| BAP-MW-203 | Molybdenum, Mo | 1J | ug/L |
| BAP-MW-203 | pH | 7.1 | STD |
| BAP-MW-203 | Residue, Filterable, TDS | 435 | mg/L |
| BAP-MW-203 | Selenium, Se | 1.1 | ug/L |
| BAP-MW-203 | Sulfate, SO4 | 65.5 | mg/L |
| BAP-MW-203 | Thallium, Tl | <0.1U | ug/L |

**Groundwater Data Summary
Mountaineer Plant - Bottom Ash Pond**

Geosyntec Consultants

| Parameter | Unit | MW-1601A | | MW-1602 | | MW-1603 | | MW-1604D | | MW-1604S | | MW-1605D | |
|------------------------|-------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| | | 3/12/2020 | 5/15/2020 | 3/11/2020 | 5/15/2020 | 3/11/2020 | 5/15/2020 | 3/10/2020 | 5/14/2020 | 3/10/2020 | 5/14/2020 | 3/10/2020 | 5/19/2020 |
| Antimony | µg/L | 0.1 U | 0.03 J | 0.1 U | 0.02 J | 0.1 U | 0.1 U | 0.02 J | 0.03 J | 0.14 | 0.15 | 0.03 J | 0.04 J |
| Arsenic | µg/L | 0.58 | 0.57 | 0.31 | 0.31 | 0.29 | 0.27 | 0.31 | 0.28 | 0.29 | 0.30 | 3.01 | 2.73 |
| Barium | µg/L | 64.9 | 67.8 | 28.9 | 30.0 | 30.4 | 30.0 | 34.2 | 34.1 | 28.9 | 29.1 | 29.6 | 25.7 |
| Beryllium | µg/L | 0.1 U | - |
| Boron | mg/L | - | 0.136 | - | 0.118 | - | 0.275 | - | 4.65 | - | 3.68 | - | 6.92 |
| Cadmium | µg/L | 0.01 J | 0.02 J | 0.05 U | 0.01 J | 0.01 J | 0.01 J | 0.03 J | 0.03 J | 0.12 | 0.19 | 0.02 J | 0.01 J |
| Calcium | mg/L | - | 185 | - | 99.2 | - | 161 | - | 205 | - | 250 | - | 265 |
| Chloride | mg/L | - | 22.7 | - | 9.67 | - | 10.7 | - | 113 | - | 116 | - | 169 |
| Chromium | µg/L | 0.205 | 0.1 J | 0.261 | 0.2 J | 0.224 | 0.210 | 0.311 | 0.729 | 0.323 | 0.1 J | 0.08 J | 0.1 J |
| Cobalt | µg/L | 0.02 J | 0.05 U | 0.05 U | 0.04 J | 0.061 | 0.094 | 0.138 | 0.117 | 1.72 | 1.93 | 1.67 | 1.45 |
| Combined Radium | pCi/L | 1.685 | 0.553 | 0.4389 | 0.5819 | 2.036 | 0.701 | 0.834 | 0.1393 | 1.662 | 1.038 | 0.3851 | 0.425 |
| Fluoride | mg/L | 0.14 | 0.16 | 0.23 | 0.25 | 0.06 | 0.09 | 0.22 | 0.25 | 0.24 | 0.25 | 0.19 J | 0.17 J |
| Lead | µg/L | 0.2 U | 0.2 U | 0.05 J | 0.2 U | 0.08 J | 0.07 J | 0.2 U |
| Lithium | mg/L | 0.00183 | 0.00190 | 0.0117 | 0.0126 | 0.0175 | 0.0182 | 0.0235 | 0.0218 | 0.0390 | 0.0419 | 0.0502 | 0.0495 |
| Mercury | µg/L | 0.005 U | - |
| Molybdenum | µg/L | 1 J | 0.7 J | 1 J | 0.9 J | 2 U | 2 U | 1 J | 1 J | 13.7 | 14.9 | 32.7 | 32.8 |
| Selenium | µg/L | 1.4 | 0.9 | 0.2 J | 0.09 J | 0.2 J | 0.2 J | 0.8 | 0.7 | 1.2 | 1.1 | 0.2 J | 0.2 J |
| Sulfate | mg/L | - | 274 | - | 264 | - | 387 | - | 667 | - | 715 | - | 848 |
| Thallium | µg/L | 0.5 U | 0.2 J | 0.2 J | 0.5 U | 0.5 U |
| Total Dissolved Solids | mg/L | - | 814 | - | 595 | - | 809 | - | 1,390 | - | 1,520 | - | 1,670 |
| pH | SU | 6.7 | 6.7 | 6.4 | 6.4 | 6.4 | 6.5 | 6.4 | 6.7 | 6.7 | 6.9 | 6.9 | 7.0 |

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

**Groundwater Data Summary
Mountaineer Plant - Bottom Ash Pond**

Geosyntec Consultants

| Parameter | Unit | MW-1605S | | MW-1606D | | MW-1606S | | MW-1607D | | MW-1607S | | MW-1608 | |
|------------------------|-------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| | | 3/10/2020 | 5/19/2020 | 3/10/2020 | 5/19/2020 | 3/10/2020 | 5/19/2020 | 3/11/2020 | 5/20/2020 | 3/10/2020 | 5/20/2020 | 3/10/2020 | 5/13/2020 |
| Antimony | µg/L | 0.08 J | 0.04 J | 0.14 | 0.15 | 0.13 | 0.14 | 0.1 U | 0.03 J | 0.41 | 0.45 | 0.1 U | 0.04 J |
| Arsenic | µg/L | 0.62 | 0.47 | 0.35 | 0.32 | 0.62 | 0.65 | 1.56 | 1.42 | 0.92 | 0.93 | 0.37 | 0.36 |
| Barium | µg/L | 26.5 | 21.1 | 45.3 | 45.6 | 60.9 | 59.8 | 68.3 | 65.6 | 69.2 | 66.8 | 30.5 | 31.3 |
| Beryllium | µg/L | 0.1 U | - |
| Boron | mg/L | - | 4.83 | - | 5.92 | - | 5.94 | - | 3.89 | - | 3.55 | - | 0.108 |
| Cadmium | µg/L | 0.04 J | 0.03 J | 0.05 | 0.06 | 0.07 | 0.06 | 0.05 U | 0.05 U | 0.04 J | 0.04 J | 0.05 U | 0.02 J |
| Calcium | mg/L | - | 154 | - | 270 | - | 207 | - | 228 | - | 190 | - | 92.7 |
| Chloride | mg/L | - | 93.5 | - | 178 | - | 181 | - | 181 | - | 172 | - | 5.22 |
| Chromium | µg/L | 0.305 | 0.1 J | 0.2 J | 0.1 J | 0.1 J | 0.1 J | 0.08 J | 0.2 J | 0.321 | 0.249 | 0.264 | 0.2 J |
| Cobalt | µg/L | 0.723 | 0.208 | 1.11 | 1.10 | 0.322 | 0.435 | 0.846 | 0.913 | 1.23 | 1.42 | 0.070 | 0.092 |
| Combined Radium | pCi/L | 0.842 | 0.639 | 0.946 | 0.975 | 0.434 | 0.3814 | 2.552 | 0.815 | 1.171 | 0.3123 | 0.67 | 0.569 |
| Fluoride | mg/L | 0.30 | 0.28 | 0.27 | 0.24 | 0.40 | 0.38 | 0.41 | 0.51 | 0.24 | 0.23 | 0.21 | 0.22 |
| Lead | µg/L | 0.497 | 0.2 U | 0.2 U | 0.2 U | 0.05 J | 0.2 U | 0.2 U | 0.05 J | 0.06 J | 0.06 J | 0.06 J | 0.275 |
| Lithium | mg/L | 0.0558 | 0.0523 | 0.0700 | 0.0681 | 0.0721 | 0.0730 | 0.108 | 0.104 | 0.110 | 0.105 | 0.00229 | 0.00241 |
| Mercury | µg/L | 0.005 U | - |
| Molybdenum | µg/L | 12.8 | 12.3 | 62.5 | 67.0 | 51.7 | 56.0 | 79.6 | 83.5 | 35.5 | 35.8 | 0.6 J | 0.7 J |
| Selenium | µg/L | 0.8 | 0.7 | 0.5 | 0.5 | 4.4 | 5.3 | 0.04 J | 0.08 J | 4.5 | 5.7 | 4.3 | 2.1 |
| Sulfate | mg/L | - | 543 | - | 756 | - | 646 | - | 722 | - | 407 | - | 158 |
| Thallium | µg/L | 0.5 U |
| Total Dissolved Solids | mg/L | - | 1,160 | - | 1,600 | - | 1,400 | - | 1,620 | - | 1,230 | - | 440 |
| pH | SU | 6.9 | 6.9 | 7.0 | 7.0 | 6.8 | 6.7 | 7.1 | 7.2 | 6.9 | 7.0 | 6.7 | 6.8 |

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

Appendix 5

No monitoring wells were installed or decommissioned in 2020.

EPA ADDITIONAL INFORMATION REQUEST

ATTACHMENT B

MOUNTAINEER PLANT LANDFILL

2020 ANNUAL GROUNDWATER MONITORING REPORT

Annual Groundwater Monitoring Report

Appalachian Power Company
Mountaineer Plant
Landfill CCR Management Unit
Letart, WV

January 2021

Prepared by:
American Electric Power Service Corporation
1 Riverside Plaza
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An **AEP** Company

BOUNLESS ENERGYSM

Table of Contents

| | | |
|-------|--|----------|
| I. | Overview | 1 |
| II. | Groundwater Monitoring Well Locations and Identification Numbers | 2 |
| III. | Monitoring Wells Installed or Decommissioned..... | 4 |
| IV. | Groundwater Quality Data and Static Water Elevation Data, With Flow Rate and Direction and Discussion | 4 |
| V. | Groundwater Quality Data Statistical Analysis | 4 |
| VI. | Alternative Source Demonstrations..... | 4 |
| VII. | Discussion About Transition Between Monitoring Requirements or Alternate Monitoring Frequency | 4 |
| VIII. | Description of Any Problems Encountered in 2020 and Actions Taken | 5 |
| IX. | A Projection of Key Activities for the Upcoming Year | 5 |

Appendix 1 – Groundwater Data Tables and Figures

Appendix 2 – Statistical Analyses

Appendix 3 – Alternative Source Demonstrations – Not Applicable

Appendix 4 – Notices for Monitoring Program Transitions – Not Applicable

Appendix 5 – Well Installation/Decommissioning Logs – Not Applicable

I. Overview

This *Annual Groundwater Monitoring and Corrective Action Report* (Report) has been prepared to report the status of activities for the preceding year for the landfill CCR unit at Appalachian Power Company's, a wholly-owned subsidiary of American Electric Power Company (AEP), Mountaineer Power Plant. The USEPA's CCR rules require that the Annual Groundwater Monitoring and Corrective Action 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 and analyzed for Appendix III constituents, as specified in 40 CFR 257.94 *et seq.* and AEP's *Groundwater Sampling and Analysis Plan (2016)*;
- Groundwater data underwent various validation tests, including tests for completeness, valid values, transcription errors, and consistent units;
- Groundwater data, flow, and velocities are included in **Appendix 1**.
- Appendix III constituents were compared to prediction intervals established from background data established previously;
- Background updates were completed for appendix III indicator parameters and are summarized in the *Statistical Analysis Summary – Background Update Calculation* (January 2020) report for Mountaineer Landfill, include in **Appendix 2**.
- No Statistically significant increases were observed in the May 2020 detection monitoring event. The complete statistical analysis for this event is included in **Appendix 2**.
- October 2020 detection monitoring data is undergoing statistical analysis and will be completed in early 2021.

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 significant increase over background concentrations (Attached as **Appendix 2**, where applicable);

- A discussion of whether any alternate source demonstration were performed, and the conclusions (Attached as **Appendix 3**, where applicable);
- A summary of any transition between monitoring program, 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 as to why that happened (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

The figure that follows depicts the PE-certified groundwater monitoring network, the monitoring well locations and their corresponding identification.

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 Mountaineer 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 since background through data received in 2020. Static water elevation data from each monitoring event also are shown in **Appendix 1**, along with the groundwater velocity calculations, groundwater flow direction and potentiometric maps developed after each sampling event.

V. Groundwater Quality Data Statistical Analysis

Statistical analysis completed in 2020 of the detection monitoring samples collected and analyzed in May 2020 are included in **Appendix 2** of this report.

Samples collected in October 2020 were analyzed and results received in late 2020. The statistical analysis of these results is underway and will be completed within the 90-day timeframe allowed.

Background updates for the appendix III indicator parameters was completed and that report is also included in **Appendix 2**.

VI. Alternative Source Demonstrations

No alternative source demonstrations were completed in 2020.

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

There has been no transition between detection monitoring and assessment monitoring at Mountaineer Plant's Landfill. Detection monitoring will continue in 2021. The sampling frequency of twice per year will be maintained for the Appendix III parameters (boron, calcium, chloride, fluoride, pH, sulfate and total dissolved solids).

Statistical analysis of the October 2020 event will be completed in early 2021. If necessary, an ASD will be completed or an assessment monitoring program will be initiated.

Regarding defining an alternate monitoring frequency, the groundwater velocity and monitoring well production is high enough at this facility that no modification of the twice-per-year detection monitoring effort is needed.



Monitoring Well Network

- ◆ Downgradient Sampling Location
- ◆ Background Sampling Location
- ◆ Landfill

Notes

- Monitoring well coordinates provided by AEP.
- Site features based on information available in Little Broad Run Landfill-CCR Groundwater Monitoring Well Network Evaluation (Arcadis, 2016) provided by AEP.

750 375 0 750
Feet

Site Layout CCR Landfill

AEP Mountaineer Generating Plant
Letart, West Virginia

Geosyntec
consultants

Figure
1

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

No significant problems were encountered. The low flow sampling effort went smoothly and the schedule was met to support this first annual groundwater report preparation.

IX. A Projection of Key Activities for the Upcoming Year

Key activities for 2021 include:

- Detection monitoring on a twice per year schedule.
- Evaluation of the detection monitoring results from a statistical analysis viewpoint, looking for any statistically significant increases, or decreases when pH is considered.
- Responding to any new data received in light of what the CCR rule requires.
- Preparation of the 2021 annual groundwater report.

APPENDIX 1 - Groundwater Data Tables and Figures

Tables follow, showing the groundwater monitoring data collected and the rate and direction of groundwater flow. The dates that the samples were collected also is shown.

Table 1 - Groundwater Data Summary: MW-26
Mountaineer - LF
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/27/2016 | Background | 0.097 | 61.5 | 5.57 | 0.12 | 7.5 | 9.6 | 322 |
| 11/1/2016 | Background | 0.117 | 50.5 | 5.17 | 0.13 | 7.4 | 10.6 | 270 |
| 12/21/2016 | Background | 0.074 | 48.6 | 5.21 | 0.13 | 7.6 | 10.2 | 316 |
| 2/22/2017 | Background | 0.145 | 56.2 | 5.35 | 0.13 | 7.4 | 6.5 | 325 |
| 3/28/2017 | Background | 0.222 | 52.9 | 6.25 | 0.13 | 7.4 | 7.3 | 334 |
| 4/17/2017 | Background | 0.169 | 57.1 | 5.73 | 0.13 | 7.3 | 6.7 | 320 |
| 5/17/2017 | Background | 0.161 | 58.6 | 5.87 | 0.13 | 8.1 | 6.5 | 343 |
| 6/13/2017 | Background | 0.121 | 53.7 | 5.00 | 0.12 | 7.4 | 5.3 | 324 |
| 10/31/2017 | Detection | 0.165 | 54.7 | 5.48 | 0.13 | 7.5 | 5.8 | 346 |
| 1/22/2018 | Detection | -- | 55.7 | -- | -- | 7.3 | -- | -- |
| 9/20/2018 | Detection | 0.214 | 49.4 | 6.04 | 0.16 | 8.0 | 6.3 | 344 |
| 11/26/2018 | Detection | 0.182 | 53.6 | 5.97 | 0.14 | 7.4 | 7.2 | 364 |
| 4/9/2019 | Detection | 0.128 | 62.8 | 6.71 | 0.13 | 7.3 | 7.6 | 370 |
| 6/18/2019 | Detection | -- | -- | 7.22 | -- | 7.2 | -- | 387 |
| 9/9/2019 | Detection | 0.099 | 60.2 | 5.80 | 0.14 | 7.4 | 5.7 | 353 |
| 5/15/2020 | Detection | 0.100 | 55.6 | 1.72 | 2.56 | 7.1 | 3.9 | 547 |
| 7/8/2020 | Detection | -- | -- | -- | -- | 7.4 | -- | 366 |
| 10/8/2020 | Detection | 0.103 | 51.2 | 5.74 | 0.16 | 6.9 | 6.4 | 344 |

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-26
Mountaineer - LF
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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L |
| 9/27/2016 | Background | 0.13 | 3.57 | 917 | < 0.005 U | 0.01 J | 0.4 | 0.214 | 3.25 | 0.12 | 0.165 | 0.010 | < 0.002 U | 1.88 | 0.1 | 0.03 J |
| 11/1/2016 | Background | 0.11 | 4.06 | 871 | < 0.005 U | 0.005 J | 0.3 | 0.220 | 3.57 | 0.13 | 0.043 | 0.006 | < 0.002 U | 3.07 | 0.1 | 0.02 J |
| 12/21/2016 | Background | 0.12 | 4.51 | 872 | 0.01 J | 0.006 J | 1.27 | 0.329 | 3.15 | 0.13 | 0.167 | 0.004 | < 0.002 U | 3.52 | 0.2 | 0.062 |
| 2/22/2017 | Background | 0.09 | 4.11 | 717 | 0.01 J | 0.01 J | 0.731 | 0.345 | 3.6 | 0.13 | 0.244 | 0.012 | < 0.002 U | 2.53 | 0.1 | 0.04 J |
| 3/28/2017 | Background | 0.50 | 3.95 | 886 | 0.028 | 0.01 J | 1.43 | 0.532 | 2.88 | 0.13 | 0.517 | 0.014 | < 0.002 U | 1.18 | 0.2 | 0.03 J |
| 4/17/2017 | Background | 0.09 | 3.60 | 802 | 0.007 J | 0.007 J | 0.328 | 0.299 | 1.967 | 0.13 | 0.164 | 0.009 | < 0.002 U | 1.08 | 0.1 J | 0.01 J |
| 5/17/2017 | Background | 0.06 | 4.01 | 869 | < 0.004 U | 0.007 J | 0.238 | 0.251 | 3.22 | 0.13 | 0.090 | 0.007 | < 0.002 U | 3.99 | 0.1 | 0.01 J |
| 6/13/2017 | Background | 0.10 | 3.45 | 905 | 0.008 J | 0.008 J | 0.405 | 0.325 | 3.28 | 0.12 | 0.252 | 0.018 | < 0.002 U | 1.23 | 0.1 | 0.01 J |

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-27
Mountaineer - LF
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/27/2016 | Background | 0.276 | 18.9 | 1.82 | 2.23 | 9.2 | 4.9 | 618 |
| 11/1/2016 | Background | 0.288 | 1.57 | 1.86 | 2.38 | 9.1 | 7.2 | 558 |
| 12/21/2016 | Background | 0.219 | 1.39 | 1.69 | 2.44 | 9.2 | 7.3 | 528 |
| 2/22/2017 | Background | 0.282 | 1.42 | 1.48 | 2.27 | 9.1 | 4.3 | 531 |
| 3/28/2017 | Background | 0.387 | 1.26 | 1.59 | 2.32 | 9.3 | 4.7 | 508 |
| 4/17/2017 | Background | 0.312 | 1.65 | 1.56 | 2.30 | 9.0 | 5.0 | 536 |
| 5/17/2017 | Background | 0.290 | 1.48 | 1.59 | 2.38 | 11.1 | 4.8 | 539 |
| 6/13/2017 | Background | 0.293 | 1.77 | 1.64 | 2.33 | 9.4 | 4.5 | 526 |
| 10/31/2017 | Detection | 0.275 | 1.33 | 1.63 | 2.38 | 9.2 | 4.2 | 544 |
| 9/20/2018 | Detection | 0.357 | 1.14 | 1.69 | 2.41 | 9.1 | 4.4 | 550 |
| 11/26/2018 | Detection | 0.292 | 1.20 | 1.52 | 2.37 | 9.0 | 3.6 | 522 |
| 4/9/2019 | Detection | 0.303 | 1.19 | 1.54 | 2.32 | 9.0 | 2.9 | 542 |
| 9/10/2019 | Detection | 0.285 | 1.13 | 1.67 | 2.71 | 9.1 | 3.0 | 530 |
| 5/15/2020 | Detection | 0.100 | 54.5 | 6.06 | 0.14 | 8.8 | 7.0 | 359 |
| 7/8/2020 | Detection | -- | 1.20 | 1.63 | -- | 9.1 | -- | -- |
| 10/8/2020 | Detection | 0.273 | 1.20 | 1.67 | 2.38 | 8.7 | 3.4 | 541 |

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-27
Mountaineer - LF
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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L | µg/L |
| 9/27/2016 | Background | 0.39 | 8.05 | 326 | 0.654 | 0.11 | 11.6 | 4.95 | 2.565 | 2.23 | 17.3 | 0.016 | 0.004 J | 24.2 | 2.2 | 0.1 J |
| 11/1/2016 | Background | 0.26 | 5.42 | 151 | 0.158 | 0.02 | 5.0 | 0.817 | 2.003 | 2.38 | 4.00 | 0.007 | < 0.002 U | 35.6 | 0.4 | 0.03 J |
| 12/21/2016 | Background | 0.23 | 4.26 | 113 | 0.093 | 0.01 J | 2.94 | 0.502 | 1.489 | 2.44 | 8.87 | 0.001 | < 0.002 U | 34.6 | 0.3 | 0.04 J |
| 2/22/2017 | Background | 0.06 | 3.76 | 94.8 | 0.054 | 0.009 J | 1.95 | 0.320 | 1.419 | 2.27 | 1.28 | 0.012 | 0.002 J | 32.1 | 0.1 | 0.03 J |
| 3/28/2017 | Background | 0.08 | 4.45 | 105 | 0.062 | 0.008 J | 1.69 | 0.319 | 0.888 | 2.32 | 1.06 | 0.016 | < 0.002 U | 31.5 | 0.2 | 0.02 J |
| 4/17/2017 | Background | 0.15 | 4.54 | 108 | 0.085 | 0.01 J | 2.36 | 0.511 | 0.486 | 2.30 | 1.45 | 0.005 | 0.002 J | 32.0 | 0.2 | 0.02 J |
| 5/17/2017 | Background | 0.11 | 4.54 | 94.6 | 0.052 | 0.005 J | 1.33 | 0.335 | 0.20279 | 2.38 | 0.971 | 0.015 | < 0.002 U | 31.6 | 0.2 | 0.01 J |
| 6/13/2017 | Background | 0.18 | 4.55 | 102 | 0.082 | 0.01 J | 2.25 | 0.600 | 0.797 | 2.33 | 1.39 | 0.015 | < 0.002 U | 30.6 | 0.2 | 0.02 J |

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-30
Mountaineer - LF
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 10/26/2016 | Background | 0.239 | 16.6 | 250 | 3.42 | 8.7 | 31.5 | -- |
| 11/2/2016 | Background | 0.240 | 10.9 | 257 | 3.41 | 8.6 | 19.6 | 1,350 |
| 12/28/2016 | Background | 0.250 | 9.91 | 250 | 3.43 | 8.0 | 19.1 | 1,280 |
| 2/22/2017 | Background | 0.257 | 2.76 | 246 | 3.18 | 8.6 | 11.5 | 1,220 |
| 3/29/2017 | Background | 0.344 | 2.54 | 242 | 3.31 | 8.7 | 0.1 J | 1,270 |
| 4/19/2017 | Background | 0.296 | 2.91 | 247 | 3.28 | 8.5 | 11.2 | 1,210 |
| 5/17/2017 | Background | 0.269 | 2.97 | 247 | 1.34 | 10.1 | 4.4 | 1,290 |
| 6/13/2017 | Background | 0.283 | 4.06 | 255 | 3.28 | 8.9 | 10.8 | 1,170 |
| 10/31/2017 | Detection | 0.315 | 3.27 | 257 | 3.30 | 8.5 | 11.4 | 1,210 |
| 9/20/2018 | Detection | 0.315 | 4.69 | 253 | 3.36 | 8.6 | 13.0 | 1,230 |
| 11/27/2018 | Detection | 0.344 | 3.16 | 247 | 3.40 | 8.4 | 11.7 | 1,240 |
| 4/9/2019 | Detection | 0.290 | 2.88 | 245 | 3.32 | 8.4 | 10.6 | 1,260 |
| 9/10/2019 | Detection | 0.259 | 3.39 | 249 | 3.76 | 8.3 | 9.6 | 1,260 |
| 5/18/2020 | Detection | 0.271 | 2.95 | 264 | 3.54 | 8.1 | 10.8 | 1,240 |
| 10/8/2020 | Detection | 0.249 | 2.93 | 247 | 2.73 | 8.0 | 10.9 | 1,260 |

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-30
Mountaineer - LF
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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L | µg/L |
| 10/26/2016 | Background | 0.36 | 7.38 | 567 | 0.692 | 0.10 | 13.1 | 33.8 | 2.588 | 3.42 | 33.2 | 0.034 | 0.054 | 68.7 | 3.8 | 0.724 |
| 11/3/2016 | Background | 0.26 | 7.54 | 576 | 0.630 | 0.09 | 11.7 | 33.3 | 1.404 | 3.41 | 30.9 | 0.026 | 0.016 | 73.7 | 2.7 | 0.654 |
| 12/28/2016 | Background | 0.91 | 6.87 | 360 | 0.502 | 0.08 | 18.1 | 15.9 | 2.725 | 3.43 | 13.8 | 0.024 | 0.026 | 107 | 2.6 | 0.350 |
| 2/22/2017 | Background | 0.52 | 4.65 | 223 | 0.082 | 0.008 J | 3.24 | 2.40 | 2.418 | 3.18 | 1.68 | 0.022 | 0.004 J | 125 | 0.5 | 0.258 |
| 3/29/2017 | Background | 0.66 | 5.45 | 243 | 0.149 | 0.007 J | 6.13 | 4.24 | 1.204 | 3.31 | 3.62 | 0.027 | 0.003 J | 120 | 0.7 | 0.381 |
| 4/19/2017 | Background | 1.55 | 5.80 | 246 | 0.140 | 0.01 J | 5.76 | 3.91 | 3.83 | 3.28 | 3.49 | 0.019 | 0.061 | 123 | 0.7 | 0.365 |
| 5/17/2017 | Background | 0.75 | 6.90 | 241 | 0.120 | < 0.005 U | 3.99 | 3.63 | 2.395 | 1.34 | 3.41 | 0.027 | 0.004 J | 128 | 0.9 | 0.287 |
| 6/13/2017 | Background | 2.74 | 6.86 | 251 | 0.197 | 0.02 J | 6.83 | 5.35 | 3.45 | 3.28 | 4.80 | 0.027 | 0.005 J | 118 | 0.8 | 0.366 |

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-38
Mountaineer - LF
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/27/2016 | Background | 0.024 | 55.7 | 7.12 | 0.32 | 7.1 | 28.1 | 410 |
| 11/2/2016 | Background | 0.040 | 46.3 | 7.27 | 0.32 | 7.0 | 36.6 | 358 |
| 12/21/2016 | Background | 0.019 | 48.2 | 7.43 | 0.35 | 7.4 | 35.8 | 404 |
| 2/22/2017 | Background | 0.028 | 47.2 | 7.21 | 0.29 | 7.0 | 31.7 | 409 |
| 3/28/2017 | Background | 0.070 | 50.0 | 7.08 | 0.32 | 7.0 | 30.1 | 390 |
| 4/18/2017 | Background | 0.038 | 52.5 | 7.22 | 0.33 | 7.0 | 30.6 | 422 |
| 5/16/2017 | Background | 0.027 | 54.5 | 7.41 | 0.33 | 7.6 | 32.5 | 421 |
| 6/13/2017 | Background | 0.093 | 51.4 | 7.01 | 0.28 | 7.0 | 31.0 | 406 |
| 10/31/2017 | Detection | 0.045 | 56.1 | 7.59 | 0.38 | 7.0 | 28.7 | 460 |
| 1/22/2018 | Detection | -- | 53.8 | -- | -- | 6.7 | -- | 419 |
| 9/20/2018 | Detection | 0.068 | 51.2 | 7.31 | 0.36 | 7.4 | 31.5 | 441 |
| 11/26/2018 | Detection | 0.08 J | 48.2 | 7.06 | 0.34 | 7.0 | 35.2 | 415 |
| 4/9/2019 | Detection | 0.04 J | 52.0 | 7.46 | 0.32 | 6.9 | 27.8 | 427 |
| 6/18/2019 | Detection | -- | -- | -- | -- | 7.6 | -- | -- |
| 9/10/2019 | Detection | 0.03 J | 49.9 | 7.45 | 0.35 | 7.7 | 28.2 | 417 |
| 10/22/2019 | Detection | -- | -- | -- | -- | 6.9 | -- | -- |
| 5/15/2020 | Detection | 0.02 J | 48.3 | 7.59 | 0.38 | 6.7 | 31.4 | 421 |
| 10/8/2020 | Detection | 0.03 J | 53.4 | 7.68 | 0.47 | 6.8 | 25.5 | 452 |

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-38
Mountaineer - LF
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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L | µg/L |
| 9/27/2016 | Background | 0.09 | 9.82 | 221 | 0.023 | 0.03 | 1.0 | 2.72 | 2.229 | 0.32 | 0.442 | 0.002 | < 0.002 U | 2.76 | 0.2 | 0.103 |
| 11/2/2016 | Background | 0.07 | 8.15 | 179 | < 0.005 U | 0.02 J | 0.4 | 0.855 | 1.744 | 0.32 | 0.113 | 0.0009 J | < 0.002 U | 2.10 | 0.04 J | 0.04 J |
| 12/21/2016 | Background | 0.05 | 6.62 | 162 | < 0.005 U | 0.02 | 1.67 | 0.655 | 2.06 | 0.35 | 0.082 | < 0.0002 U | < 0.002 U | 2.50 | 0.06 J | 0.082 |
| 2/22/2017 | Background | 0.03 J | 5.74 | 141 | < 0.005 U | 0.02 | 0.526 | 0.949 | 1 | 0.29 | 0.039 | 0.004 | < 0.002 U | 3.37 | 0.03 J | 0.04 J |
| 3/28/2017 | Background | 0.05 J | 11.5 | 184 | < 0.005 U | 0.03 | 0.197 | 0.916 | 0.548 | 0.32 | 0.073 | 0.006 | < 0.002 U | 2.47 | 0.06 J | 0.05 J |
| 4/18/2017 | Background | 0.04 J | 6.34 | 179 | < 0.004 U | 0.03 | 0.111 | 2.87 | 0.494 | 0.33 | 0.02 J | 0.003 | < 0.002 U | 2.30 | < 0.03 U | 0.068 |
| 5/16/2017 | Background | 0.06 | 5.09 | 186 | < 0.004 U | 0.03 | 0.093 | 3.66 | 0.536 | 0.33 | 0.01 J | 0.004 | < 0.002 U | 3.76 | < 0.03 U | 0.062 |
| 6/13/2017 | Background | 0.06 | 8.09 | 187 | < 0.004 U | 0.03 | 0.130 | 2.53 | 1.268 | 0.28 | 0.056 | 0.013 | < 0.002 U | 2.67 | 0.04 J | 0.056 |

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-39
Mountaineer - LF
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/26/2016 | Background | 0.143 | 12.4 | 3.00 | 0.77 | 8.4 | < 0.04 U | 350 |
| 11/2/2016 | Background | 0.134 | 7.88 | 3.05 | 0.83 | 8.4 | < 0.04 U | 344 |
| 12/21/2016 | Background | 0.122 | 10.5 | 3.07 | 0.86 | 8.8 | < 0.04 U | 450 |
| 2/22/2017 | Background | 0.134 | 7.65 | 2.98 | 0.80 | 8.4 | < 0.04 U | 374 |
| 3/28/2017 | Background | 0.202 | 5.95 | 2.95 | 0.78 | 8.4 | 0.1 J | 310 |
| 4/18/2017 | Background | 0.156 | 6.48 | 2.91 | 0.78 | 8.3 | < 0.04 U | 344 |
| 5/16/2017 | Background | 0.139 | 6.74 | 2.98 | 0.79 | 9.5 | 1.5 | 367 |
| 6/14/2017 | Background | 0.179 | 6.15 | 2.92 | 0.78 | 8.5 | 0.1 | 340 |
| 10/31/2017 | Detection | 0.171 | 7.25 | 3.05 | 0.78 | 8.3 | 0.2 | 385 |
| 9/20/2018 | Detection | 0.182 | 6.43 | 2.99 | 0.80 | 8.5 | 0.1 J | 369 |
| 11/26/2018 | Detection | 0.167 | 6.33 | 2.93 | 0.80 | 8.3 | 0.07 J | 380 |
| 4/9/2019 | Detection | 0.158 | 6.65 | 2.94 | 0.77 | 8.3 | < 0.06 U | 376 |
| 9/9/2019 | Detection | 0.144 | 6.78 | 3.07 | 0.84 | 8.1 | < 0.06 U | 369 |
| 5/15/2020 | Detection | 0.148 | 6.15 | 3.11 | 0.84 | 7.9 | 0.2 J | 374 |
| 7/8/2020 | Detection | -- | -- | -- | -- | 8.4 | -- | -- |
| 10/8/2020 | Detection | 0.133 | 6.11 | 2.98 | 0.89 | 7.9 | < 0.06 U | 404 |

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-39
Mountaineer - LF
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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L | µg/L |
| 9/26/2016 | Background | 0.06 | 4.80 | 264 | 0.095 | 0.01 J | 2.2 | 1.43 | 1.142 | 0.77 | 2.21 | 0.016 | < 0.002 U | 8.51 | 0.3 | 0.04 J |
| 11/2/2016 | Background | 0.04 J | 3.89 | 276 | 0.068 | < 0.004 U | 3.2 | 0.615 | 1.941 | 0.83 | 0.532 | 0.011 | < 0.002 U | 9.54 | 0.09 J | 0.03 J |
| 12/21/2016 | Background | 0.08 | 3.95 | 296 | 0.202 | 0.006 J | 6.32 | 2.34 | 1.311 | 0.86 | 1.79 | 0.008 | < 0.002 U | 8.03 | 0.6 | 0.070 |
| 2/22/2017 | Background | 0.03 J | 3.91 | 243 | 0.041 | 0.01 J | 1.41 | 0.539 | 1.162 | 0.80 | 0.467 | 0.012 | 0.002 J | 9.23 | 0.1 | 0.03 J |
| 3/28/2017 | Background | 0.02 J | 3.58 | 241 | 0.01 J | < 0.004 U | 0.560 | 0.206 | 0.793 | 0.78 | 0.176 | 0.015 | < 0.002 U | 8.50 | 0.06 J | 0.02 J |
| 4/18/2017 | Background | 0.01 J | 3.70 | 244 | 0.007 J | < 0.005 U | 0.243 | 0.188 | 0.1602 | 0.78 | 0.113 | 0.009 | < 0.002 U | 8.65 | 0.04 J | < 0.01 U |
| 5/16/2017 | Background | 0.01 J | 3.88 | 244 | 0.004 J | 0.02 | 0.221 | 0.174 | 0.611 | 0.79 | 0.073 | 0.017 | < 0.002 U | 9.39 | 0.04 J | < 0.01 U |
| 6/14/2017 | Background | 0.02 J | 3.76 | 247 | 0.008 J | < 0.005 U | 0.203 | 0.209 | 0.47 | 0.78 | 0.092 | 0.028 | < 0.002 U | 9.06 | 0.06 J | < 0.01 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-1611
Mountaineer - LF
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 9/26/2016 | Background | 0.136 | 25.0 | 8.72 | 0.56 | 7.8 | 17.3 | 382 |
| 11/2/2016 | Background | 0.140 | 22.8 | 9.36 | 0.61 | 7.8 | 22.7 | 388 |
| 12/20/2016 | Background | 0.124 | 22.2 | 9.39 | 0.64 | 7.7 | 21.8 | 380 |
| 2/22/2017 | Background | 0.175 | 22.5 | 9.10 | 0.57 | 7.7 | 18.0 | 381 |
| 3/28/2017 | Background | 0.210 | 22.3 | 8.04 | 0.50 | 7.8 | 15.7 | 326 |
| 4/18/2017 | Background | 0.155 | 22.8 | 8.59 | 0.56 | 7.7 | 17.7 | 388 |
| 5/16/2017 | Background | 0.190 | 23.1 | 9.14 | 0.60 | 8.3 | 18.7 | 392 |
| 6/12/2017 | Background | 0.158 | 22.4 | 9.29 | 0.57 | 7.2 | 19.4 | 384 |
| 10/31/2017 | Detection | 0.152 | 24.0 | 9.80 | 0.61 | 7.8 | 18.9 | 402 |
| 1/22/2018 | Detection | -- | 22.6 | -- | -- | 7.5 | -- | 376 |
| 9/20/2018 | Detection | 0.258 | 23.2 | 9.48 | 0.61 | 7.8 | 19.0 | 416 |
| 11/26/2018 | Detection | 0.147 | 21.9 | 9.57 | 0.62 | 7.7 | 18.5 | 387 |
| 4/9/2019 | Detection | 0.139 | 26.2 | 7.96 | 0.46 | 7.6 | 20.7 | 431 |
| 6/18/2019 | Detection | -- | 22.8 | 9.58 | -- | 7.9 | -- | -- |
| 7/10/2019 | Detection | -- | -- | -- | -- | 7.6 | -- | 402 |
| 9/9/2019 | Detection | 0.136 | 26.1 | 10.1 | 0.62 | 7.7 | 17.3 | 402 |
| 5/15/2020 | Detection | 0.135 | 24.0 | 9.35 | 0.61 | 7.3 | 20.8 | 404 |
| 10/8/2020 | Detection | 0.124 | 24.8 | 9.44 | 0.64 | 7.3 | 22.2 | 451 |

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-1611
Mountaineer - LF
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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L | µg/L |
| 9/26/2016 | Background | 0.03 J | 1.01 | 165 | 0.046 | 0.02 | 1.4 | 0.370 | 1.258 | 0.56 | 0.482 | 0.004 | < 0.002 U | 6.97 | 0.07 J | 0.088 |
| 11/2/2016 | Background | 0.03 J | 0.97 | 156 | 0.030 | 0.01 J | 0.9 | 0.245 | 2.888 | 0.61 | 0.310 | 0.004 | < 0.002 U | 5.83 | 0.06 J | 0.03 J |
| 12/20/2016 | Background | < 0.01 U | 0.74 | 140 | < 0.005 U | < 0.004 U | 2.10 | 0.092 | 0.772 | 0.64 | 0.023 | 0.002 | < 0.002 U | 5.46 | < 0.03 U | < 0.01 U |
| 2/22/2017 | Background | < 0.01 U | 0.75 | 135 | 0.007 J | 0.006 J | 0.209 | 0.096 | 0.5828 | 0.57 | 0.055 | 0.007 | 0.002 J | 5.36 | 0.04 J | 0.208 |
| 3/28/2017 | Background | 0.01 J | 0.60 | 166 | 0.01 J | 0.005 J | 0.426 | 0.108 | 0.645 | 0.50 | 0.195 | 0.011 | < 0.002 U | 7.26 | 0.07 J | 0.02 J |
| 4/18/2017 | Background | 0.01 J | 0.69 | 155 | 0.01 J | 0.006 J | 0.337 | 0.104 | 0.487 | 0.56 | 0.133 | 0.003 | < 0.002 U | 6.01 | < 0.03 U | < 0.01 U |
| 5/16/2017 | Background | 0.03 J | 0.75 | 145 | 0.008 J | < 0.005 U | 0.661 | 0.101 | 2.534 | 0.60 | 0.119 | 0.006 | < 0.002 U | 5.49 | 0.04 J | 0.02 J |
| 6/12/2017 | Background | 0.03 J | 0.76 | 148 | 0.007 J | < 0.005 U | 0.138 | 0.092 | 0.508 | 0.57 | 0.058 | 0.018 | < 0.002 U | 5.39 | 0.03 J | < 0.01 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-1612
Mountaineer - LF
Appendix III Constituents

Geosyntec Consultants, Inc.

| 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 |
| 10/26/2016 | Background | 0.637 | 9.47 | 38.1 | 3.02 | 8.3 | 272 | -- |
| 11/2/2016 | Background | 0.629 | 8.48 | 33.4 | 3.23 | 8.3 | 238 | 850 |
| 12/21/2016 | Background | 0.501 | 8.96 | 36.1 | 3.33 | 8.1 | 271 | 966 |
| 2/22/2017 | Background | 0.473 | 7.90 | 35.6 | 2.95 | 8.4 | 288 | 1,090 |
| 3/29/2017 | Background | 0.673 | 7.10 | 23.7 | 3.50 | 8.7 | 190 | 1,240 |
| 4/19/2017 | Background | 0.589 | 8.61 | 22.4 | 3.26 | 8.4 | 226 | 1,040 |
| 5/16/2017 | Background | 0.565 | 12.5 | 27.8 | 2.88 | 8.8 | 346 | 1,150 |
| 6/13/2017 | Background | 0.532 | 8.09 | 27.4 | 2.98 | 8.2 | 334 | 1,130 |
| 10/31/2017 | Detection | 0.457 | 7.22 | 20.2 | 3.53 | 8.2 | 147 | 914 |
| 9/20/2018 | Detection | 0.543 | 4.50 | 14.6 | 3.78 | 8.4 | 63.9 | 835 |
| 11/26/2018 | Detection | 0.413 | 4.25 | 11.5 | 3.91 | 8.0 | 49.2 | 764 |
| 4/9/2019 | Detection | 0.449 | 3.21 | 10.2 | 4.02 | 8.3 | 54.8 | 725 |
| 9/10/2019 | Detection | 0.438 | 4.77 | 11.1 | 4.34 | 8.3 | 31.3 | 786 |
| 5/18/2020 | Detection | 0.388 | 4.18 | 6.75 | 4.39 | 8.2 | 40.5 | 637 |
| 10/8/2020 | Detection | 0.351 | 3.43 | 6.36 | 3.92 | 8.3 | 40.0 | 662 |

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-1612
Mountaineer - LF
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 | pCi/L | mg/L | µg/L | mg/L | µg/L | µg/L | µg/L | µg/L | µg/L |
| 10/26/2016 | Background | 0.31 | 12.4 | 66.2 | 0.033 | 0.007 J | 1.63 | 0.367 | 2.765 | 3.02 | 0.391 | 0.018 | < 0.002 U | 62.1 | 0.2 | 0.03 J |
| 11/2/2016 | Background | 0.35 | 16.8 | 80.4 | 0.009 J | < 0.004 U | 0.6 | 0.197 | 0.973 | 3.23 | 0.168 | 0.014 | 0.002 J | 67.6 | 0.08 J | 0.087 |
| 12/21/2016 | Background | 0.13 | 14.9 | 62.1 | 0.007 J | < 0.004 U | 0.913 | 0.111 | 0.947 | 3.33 | 0.121 | 0.011 | 0.002 J | 52.2 | 0.1 | < 0.01 U |
| 2/22/2017 | Background | 0.31 | 14.4 | 72.4 | 0.058 | < 0.004 U | 2.13 | 0.700 | 1.084 | 2.95 | 0.640 | 0.018 | 0.003 J | 38.5 | 0.1 | 0.04 J |
| 3/29/2017 | Background | 0.77 | 12.4 | 141 | 0.290 | 0.01 J | 3.19 | 2.60 | 0.86 | 3.50 | 1.37 | 0.020 | 0.014 | 45.9 | 0.5 | 0.03 J |
| 4/19/2017 | Background | 0.82 | 10.7 | 233 | 0.551 | < 0.05 U | 15.5 | 3.94 | 0.425 | 3.26 | 4.10 | 0.019 | 0.004 J | 58.0 | 1.2 | 0.2 J |
| 5/16/2017 | Background | 0.15 | 10.4 | 77.1 | 0.02 J | < 0.005 U | 0.445 | 0.231 | 2.744 | 2.88 | 0.210 | 0.022 | < 0.002 U | 43.1 | 0.1 | 0.02 J |
| 6/13/2017 | Background | 0.15 | 10.7 | 59.6 | 0.006 J | < 0.005 U | 0.227 | 0.101 | 0.824 | 2.98 | 0.023 | 0.028 | < 0.002 U | 34.3 | 0.06 J | < 0.01 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 2: Residence Time Calculation Summary - Landfill
Mountaineer Landfill**

Geosyntec Consultants, Inc.

| CCR Management Unit | Monitoring Well | Well Diameter (inches) | 2020-05 | | 2020-10 | |
|---------------------|------------------------|------------------------|--------------------------------|-----------------------------------|--------------------------------|-----------------------------------|
| | | | Groundwater Velocity (ft/year) | Groundwater Residence Time (days) | Groundwater Velocity (ft/year) | Groundwater Residence Time (days) |
| Landfill | MW-26 ^[2] | 2.0 | 1.8 | 33.3 | 1.7 | 35.6 |
| | MW-27 ^[2] | 2.0 | 18.9 | 3.2 | 17.8 | 3.4 |
| | MW-30 ^[1] | 2.0 | 5.0 | 12.1 | 5.4 | 11.2 |
| | MW-38 ^[2] | 2.0 | NC | NC | NC | NC |
| | MW-39 ^[2] | 2.0 | 16.9 | 3.6 | 18.1 | 3.4 |
| | MW-1611 ^[2] | 2.0 | 10.6 | 5.7 | 11.3 | 5.4 |
| | MW-1612 ^[1] | 2.0 | 16.1 | 3.8 | 16.2 | 3.8 |

Notes:

[1] - Background Well

[2] - Downgradient Well

NC - Not Calculated. Groundwater residence time for MW-38 could not be calculated, as it is the only monitoring well for its lithologic unit (valley alluvium) within the monitoring network.



| Legend | |
|---------------------|---|
| Monitoring Wells | Groundwater Elevation Contours |
| ⊕ Alluvium | → Approximate Groundwater Flow Direction (Unit 3) |
| ⊕ Hydrologic Unit 3 | Hydrologic Unit 3 |
| ⊕ Hydrologic Unit 4 | - - - Hydrologic Unit 3, Inferred |
| | → Approximate Groundwater Flow Direction (Unit 4) |
| | — Hydrologic Unit 4 |

Notes

- Monitoring well coordinates and water level data (collected on May 15, 2020) provided by AEP.
- Site features based on information available in Little Broad Run Landfill-CCR Groundwater Monitoring Well Network Evaluation (Arcadis, 2016) provided by AEP.
- Water level measurements from MW-25 (screened in shale below Unit 4), MW-37 (hydraulically disconnected from the rest of Unit 3), and MW-38 (screened in alluvium) were not used in ground water contouring.
- Groundwater elevation units are feet above mean sea level.

750 375 0 750
Feet

Potentiometric Surface Map - Uppermost Aquifer
May 2020

AEP Mountaineer Generating Plant - CCR Landfill
New Haven, West Virginia

Geosyntec
consultants

Figure

2



| Legend | |
|---------------------|---|
| Monitoring Wells | Groundwater Elevation Contours |
| ⊕ Alluvium | ➡ Approximate Groundwater Flow Direction (Unit 3) |
| ⊕ Hydrologic Unit 3 | — Hydrologic Unit 3 |
| ⊕ Hydrologic Unit 4 | --- Unit 3, Inferred |
| | ➡ Approximate Groundwater Flow Direction (Unit 4) |
| | — Hydrologic Unit 4 |

Notes

- Monitoring well coordinates and water level data (collected on October 5, 2020) provided by AEP.
- Site features based on information available in Little Broad Run Landfill-CCR Groundwater Monitoring Well Network Evaluation (Arcadis, 2016) provided by AEP.
- Water level measurements from MW-25 (screened in shale below Unit 4), MW-37 (hydraulically disconnected from the rest of Unit 3), and MW-38 (screened in alluvium) were not used in ground water contouring.
- Groundwater elevation units are feet above mean sea level.

750 375 0 750
Feet

Potentiometric Surface Map - Uppermost Aquifer
October 2020

AEP Mountaineer Generating Plant - CCR Landfill
New Haven, West Virginia

Geosyntec
consultants

Figure

3

Columbus, Ohio

2021/01/05

APPENDIX 2 - Statistical Analyses

The statistical analyses completed in 2021 follow.

STATISTICAL ANALYSIS SUMMARY-

Background Update Calculations

Landfill - Mountaineer Plant

New Haven, West Virginia

Submitted to



1 Riverside Plaza
Columbus, Ohio 43215-2372

Submitted by

Geosyntec 
consultants

engineers | scientists | innovators

941 Chatham Lane
Suite 103
Columbus, Ohio 43221

January 6, 2020

CHA8473

TABLE OF CONTENTS

| | |
|--|-----|
| SECTION 1 Executive Summary | 1 |
| SECTION 2 Landfill Evaluation | 2-1 |
| 2.1 Previous Background Calculations..... | 2-1 |
| 2.2 Data Validation & QA/QC | 2-1 |
| 2.3 Statistical Analysis..... | 2-1 |
| 2.3.1 Outlier Evaluation..... | 2-2 |
| 2.3.2 Establishment of Updated Background Levels | 2-2 |
| 2.3.3 Updated Prediction Limits..... | 2-3 |
| 2.4 Conclusions..... | 2-4 |
| SECTION 3 References | 3-1 |

LIST OF TABLES

| | |
|---------|---|
| Table 1 | Detection Monitoring Groundwater Data Summary |
| Table 2 | Background Level Summary |

LIST OF ATTACHMENTS

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

LIST OF ACRONYMS AND ABBREVIATIONS

| | |
|-------|---|
| ANOVA | Analysis of Variance |
| ASD | Alternative Source Demonstration |
| CCR | Coal Combustion Residuals |
| CCV | Continuing Calibration Value |
| CFR | Code of Federal Regulations |
| EPA | Environmental Protection Agency |
| LF | Landfill |
| LFB | Laboratory Fortified Blanks |
| LPL | Lower Prediction Limit |
| LRB | Laboratory Reagent Blanks |
| NELAP | National Environmental Laboratory Accreditation Program |
| PQL | Practical Quantitation Limit |
| QA | Quality Assurance |
| QC | Quality Control |
| SSI | Statistically Significant Increase |
| TDS | Total Dissolved Solids |
| UPL | Upper Prediction Limit |
| USEPA | United States Environmental Protection Agency |

SECTION 1

EXECUTIVE SUMMARY

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

Eight monitoring events were completed prior to October 2017 to establish background concentrations for Appendix III and Appendix IV parameters under the CCR rule. Four semiannual detection monitoring events were conducted between October 2017 and June 2019. Data from these four events, including both initial and verification results, were evaluated for inclusion in the background dataset. 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 detection monitoring data were submitted to Groundwater Stats Consulting, LLC for statistical analysis. The compliance data were reviewed for outliers, which were removed (when appropriate) prior to updating upper prediction limits (UPLs) for each Appendix III parameter to represent background values. Oversight on the use of statistical calculations was provided by Dr. Kirk Cameron of MacStat Consulting, Ltd. Certification of the selected statistical methods by a qualified professional engineer is documented in Attachment A.

SECTION 2

LANDFILL EVALUATION

2.1 Previous Background Calculations

Eight background monitoring events were completed from September 2016 through June 2017 to establish background concentrations for Appendix III and Appendix IV parameters under the CCR rule. The data were reviewed for outliers and trends prior to calculating upper prediction limits (UPLs) for each Appendix III parameter. Intrawell prediction limits were selected for boron, chloride, sulfate, and total dissolved solids (TDS) with a one-of-two resampling plan. Interwell prediction limits with a one-of-two resampling plan were constructed from the upgradient wells for calcium, fluoride, and pH. Lower prediction limits (LPLs) were also established for pH. The statistical analyses to establish background levels were previously documented in the January 2018 *Statistical Analysis Summary* report (Geosyntec, 2018). Tests for calcium and pH were revised to intrawell prediction limits based on an alternative source demonstration (ASD) certified on March 1, 2019 (Geosyntec, 2019).

2.2 Data Validation & QA/QC

Since October 2017, four semiannual detection monitoring events have been conducted at the LF. If the initial results for each detection monitoring event identified possible exceedances, verification sampling was completed on an individual well/parameter basis. Thus, a minimum of four samples were collected from each compliance well. A summary of data collected during these detection 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 was checked against the analytical data for transcription errors and completeness. No QA/QC issues were noted which would impact data usability.

2.3 Statistical Analysis

The detection monitoring data used to conduct the statistical analyses described below are summarized in Table 1. Statistical analyses for the Landfill were conducted in accordance with

the January 2017 *Statistical Analysis Plan* (AEP, 2017), except where noted below. The complete statistical analysis results are included in Attachment B.

Time series plots of Appendix III parameters are included in Attachment B and were used to evaluate concentrations over time and to provide an initial screening of suspected outliers and trends. Box plots were also compiled to provide visual representation of variations between wells and within individual wells (Attachment B).

2.3.1 Outlier Evaluation

Potential outliers were evaluated using Tukey's outlier test; i.e., data points were considered potential outliers if they met one of the following criteria:

$$x_i < \tilde{x}_{0.25} - 3 \times IQR \quad (1)$$

or

$$x_i > \tilde{x}_{0.75} + 3 \times IQR \quad (2)$$

where:

- x_i = individual data point
- $\tilde{x}_{0.25}$ = first quartile
- $\tilde{x}_{0.75}$ = third quartile
- IQR = the interquartile range = $\tilde{x}_{0.75} - \tilde{x}_{0.25}$

Of the data collected during the detection monitoring period, one fluoride value at MW-30 was identified as a potential outlier. However, because this value was similar to the concentrations reported in neighboring wells it was not flagged as an outlier or removed from the dataset.

2.3.2 Establishment of Updated Background Levels

Analysis of variance (ANOVA) was conducted during the initial background screening to assist in identifying if introwell tests are the most appropriate statistical approach for assessing Appendix III parameters. Introwell tests compare compliance data from a single well to background data within the same well and are most appropriate when 1) upgradient wells exhibit spatial variation; 2) when statistical limits constructed from upgradient wells would not be conservative from a regulatory perspective; or 3) when downgradient water quality is not impacted compared to upgradient water quality for the same parameter. Periodic updating of background statistical limits is necessary as natural systems continuously change due to physical changes to the environment. For introwell analyses, data for all wells and constituents are re-evaluated when a minimum of four new data points are available. These four (or more) new data points are used to determine if earlier concentrations are representative of present-day groundwater quality. For interwell comparisons, newer data are evaluated during each event for new outliers, and prediction limits are constructed using all available data from upgradient wells.

For intrawell comparisons, Mann-Whitney (Wilcoxon rank-sum) tests were used to compare the medians of historical data (September 2016 - June 2017) to the new compliance samples (October 2017 – July 2019). 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 Attachment B. Significant differences were found between the two groups for TDS in downgradient well MW-26. Upon review of the differences between the two groups, it was found that TDS concentrations at downgradient well MW-26 were lower than those reported in at least one upgradient well, and therefore the background data were updated to include the compliance data for TDS at MW-26.

For interwell predictions limits for fluoride a Sen's Slope/Mann Kendall trend test was used to evaluate data at upgradient wells. This analysis identifies statistically significant increasing or decreasing trends. The trend analysis results indicated that the data are consistent over time with no statistically significant increasing or decreasing trends (Attachment B)

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

2.3.3 Updated Prediction Limits

Intrawell upper prediction limits (UPLs) were updated using all the historical data through July 2019 to represent background values. Intrawell lower prediction limits (LPLs) were also generated for pH. The updated prediction limits are summarized in Table 2.

The intrawell 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 did not exceed the UPL, a second sample will not be collected.

The retesting procedures are intended to achieve an acceptably high statistical power to detect changes at downgradient wells for constituents evaluated using intrawell prediction limits.

Interwell prediction limits pool upgradient data to establish a background limit for an individual constituent. Interwell UPLs, with a one-of-two resample plan, were updated using all available data from upgradient wells for the same time period for fluoride. The updated prediction limits are summarized in Table 2.

2.4 Conclusions

Four detection monitoring events were completed in accordance with the CCR Rule. The laboratory and field data from these events were reviewed prior to statistical analysis, with no QA/QC issues identified that impacted data usability. Mann-Whitney tests were completed to evaluate whether data from the detection monitoring events could be added to the existing background dataset. Where appropriate, the background datasets were updated, and UPLs and LPLs were recalculated. Intrawell tests using a one-of-two retesting procedure were selected and updated for Appendix III parameters boron, calcium, chloride, pH, sulfate, and TDS. For fluoride, an interwell test using a one-of-two retesting procedure was selected and updated with the most current data.

SECTION 3

REFERENCES

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

Geosyntec Consultants, 2018. Statistical Analysis Summary. Landfill – Mountaineer Plant. January 2018.

Geosyntec Consultants, 2019. Alternative Source Demonstration – Federal CCR Rule. Mountaineer Plant Landfill. March.

United States Environmental Protection Agency (USEPA). 2009. Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities – Unified Guidance. EPA 530/R-09-007. March 2009.

TABLES

Table 1: Groundwater Data Summary
Mountaineer - Landfill

| Parameter | Unit | MW-1611 | | | | | | | MW-1612 | | | |
|------------------------|------|------------|------------|-----------|------------|----------|------------|------------|------------|-----------|------------|----------|
| | | 10/31/2017 | 1/22/2018 | 9/20/2018 | 11/26/2018 | 4/9/2019 | 6/18/2019 | 7/10/2019 | 10/30/2017 | 9/20/2018 | 11/26/2018 | 4/9/2019 |
| | | 2017-D1 | 2017-D1-R1 | 2018-D1 | 2018-D2 | 2019-D1 | 2019-D1-R1 | 2019-D1-R1 | 2017-D1 | 2018-D1 | 2018-D2 | 2019-D1 |
| Boron | mg/L | 0.152 | - | 0.258 | 0.147 | 0.139 | - | - | 0.457 | 0.543 | 0.413 | 0.449 |
| Calcium | mg/L | 24.0 | 22.6 | 23.2 | 21.9 | 26.2 | 22.8 | - | 7.22 | 4.50 | 4.25 | 3.21 |
| Chloride | mg/L | 9.80 | - | 9.48 | 9.57 | 7.96 | 9.58 | - | 20.2 | 14.6 | 11.5 | 10.2 |
| Fluoride | mg/L | 0.610 | - | 0.610 | 0.620 | 0.460 | - | - | 3.53 | 3.78 | 3.91 | 4.02 |
| Total Dissolved Solids | mg/L | 402 | 376 | 416 | 387 | 431 | - | 402 | 914 | 835 | 764 | 725 |
| Sulfate | mg/L | 18.9 | - | 19.0 | 18.5 | 20.7 | - | - | 147 | 63.9 | 49.2 | 54.8 |
| pH | SU | 7.8 | 7.5 | 7.8 | 7.7 | 7.6 | 7.9 | 7.6 | 8.2 | 8.4 | 8.0 | 8.3 |

| Parameter | Unit | MW-26 | | | | | | MW-27 | | | | MW-30 | | | |
|------------------------|------|------------|------------|-----------|------------|----------|------------|------------|-----------|------------|----------|------------|-----------|------------|----------|
| | | 10/31/2017 | 1/22/2018 | 9/20/2018 | 11/26/2018 | 4/9/2019 | 6/18/2019 | 10/31/2017 | 9/20/2018 | 11/26/2018 | 4/9/2019 | 10/30/2017 | 9/20/2018 | 11/27/2018 | 4/9/2019 |
| | | 2017-D1 | 2017-D1-R1 | 2018-D1 | 2018-D2 | 2019-D1 | 2019-D1-R1 | 2017-D1 | 2018-D1 | 2018-D2 | 2019-D1 | 2017-D1 | 2018-D1 | 2018-D2 | 2019-D1 |
| Boron | mg/L | 0.165 | - | 0.214 | 0.182 | 0.128 | - | 0.275 | 0.357 | 0.292 | 0.303 | 0.315 | 0.315 | 0.344 | 0.290 |
| Calcium | mg/L | 54.7 | 55.7 | 49.4 | 53.6 | 62.8 | - | 1.33 | 1.14 | 1.20 | 1.19 | 3.27 | 4.69 | 3.16 | 2.88 |
| Chloride | mg/L | 5.48 | - | 6.04 | 5.97 | 6.71 | 7.22 | 1.63 | 1.69 | 1.52 | 1.54 | 257 | 253 | 247 | 245 |
| Fluoride | mg/L | 0.130 | - | 0.160 | 0.140 | 0.130 | - | 2.38 | 2.41 | 2.37 | 2.32 | 3.30 | 3.36 | 3.40 | 3.32 |
| Total Dissolved Solids | mg/L | 346 | - | 344 | 364 | 370 | 387 | 544 | 550 | 522 | 542 | 1210 | 1230 | 1240 | 1260 |
| Sulfate | mg/L | 5.80 | - | 6.30 | 7.20 | 7.60 | - | 4.20 | 4.40 | 3.60 | 2.90 | 11.4 | 13.0 | 11.7 | 10.6 |
| pH | SU | 7.5 | 7.3 | 8.0 | 7.4 | 7.3 | 7.2 | 9.2 | 9.1 | 9.0 | 9.0 | 8.5 | 8.6 | 8.4 | 8.4 |

| Parameter | Unit | MW-38 | | | | | | MW-39 | | | |
|------------------------|------|------------|------------|-----------|------------|----------|------------|------------|-----------|------------|----------|
| | | 10/31/2017 | 1/22/2018 | 9/20/2018 | 11/26/2018 | 4/9/2019 | 6/18/2019 | 10/31/2017 | 9/20/2018 | 11/26/2018 | 4/9/2019 |
| | | 2017-D1 | 2017-D1-R1 | 2018-D1 | 2018-D2 | 2019-D1 | 2019-D1-R1 | 2017-D1 | 2018-D1 | 2018-D2 | 2019-D1 |
| Boron | mg/L | 0.045 | - | 0.068 | 0.080 J | 0.040 J | - | 0.171 | 0.182 | 0.167 | 0.158 |
| Calcium | mg/L | 56.1 | 53.8 | 51.2 | 48.2 | 52.0 | - | 7.25 | 6.43 | 6.33 | 6.65 |
| Chloride | mg/L | 7.59 | - | 7.31 | 7.06 | 7.46 | - | 3.05 | 2.99 | 2.93 | 2.94 |
| Fluoride | mg/L | 0.380 | - | 0.360 | 0.340 | 0.320 | - | 0.780 | 0.800 | 0.800 | 0.770 |
| Total Dissolved Solids | mg/L | 460 | 419 | 441 | 415 | 427 | - | 385 | 369 | 380 | 376 |
| Sulfate | mg/L | 28.7 | - | 31.5 | 35.2 | 27.8 | - | 0.200 | 0.100 J | 0.070 J | 0.400 U |
| pH | SU | 7.0 | 6.7 | 7.4 | 7.0 | 6.9 | 7.6 | 8.3 | 8.5 | 8.3 | 8.3 |

Notes:

mg/L: milligrams 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

-: Not Measured

D1: First semi-annual detection monitoring event of the year

D2: Second semi-annual detection monitoring event of the year

R1: First verification event associated with detection monitoring round

Table 2: Background Level Summary
Mountaineer - Landfill

Geosyntec Consultants, Inc.

| Parameter | Units | Description | MW-1611 | MW-26 | MW-27 | MW-38 | MW-39 |
|------------------------|-------|--------------------------|---------|-------|-------|-------|-------|
| Boron | mg/L | Intrawell Background UPL | 0.254 | 0.254 | 0.395 | 0.104 | 0.213 |
| Calcium | mg/L | Intrawell Background UPL | 26.2 | 64.9 | 1.89 | 58.6 | 12.4 |
| Chloride | mg/L | Intrawell Background UPL | 10.4 | 7.27 | 1.90 | 7.69 | 3.11 |
| Fluoride | mg/L | Interwell Background UPL | | | 3.91 | | |
| pH | SU | Intrawell Background UPL | 8.1 | 8.0 | 9.5 | 7.6 | 8.8 |
| | | Intrawell Background LPL | 7.3 | 7.2 | 8.8 | 6.6 | 8.1 |
| Sulfate | mg/L | Intrawell Background UPL | 23.5 | 11.5 | 7.79 | 38.5 | 0.200 |
| Total Dissolved Solids | mg/L | Intrawell Background UPL | 441 | 402 | 606 | 469 | 445 |

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

ATTACHMENT A

Certification by a Qualified Professional Engineer

Certification by a Qualified Professional Engineer

I certify that the selected and above described statistical method is appropriate for evaluating the groundwater monitoring data for the Mountaineer Landfill 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

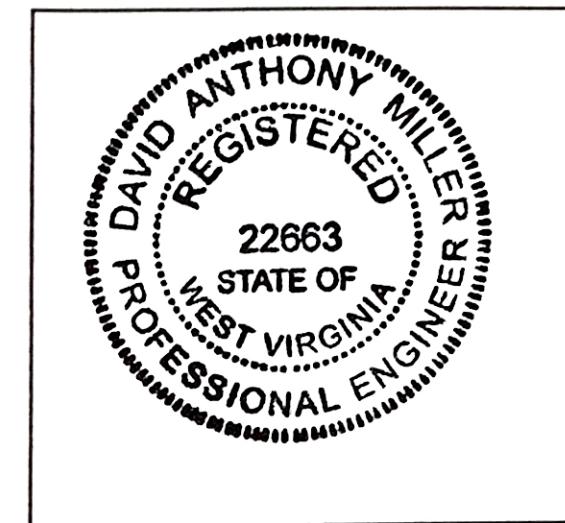
Signature

22663

License Number

WEST VIRGINIA

Licensing State



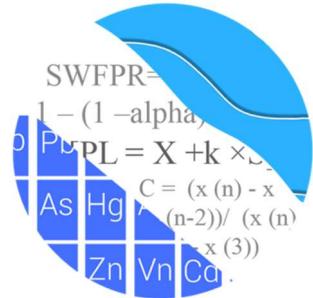
01.13.2020

Date

ATTACHMENT B

Statistical Analysis Output

GROUNDWATER STATS
CONSULTING



November 22, 2019

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

RE: July 2019 Background Update – Mountaineer Landfill

Dear Ms. Kreinberg,

Groundwater Stats Consulting, formerly the statistical consulting division of Sanitas Technologies, is pleased to provide the screening for the proposed background update of prediction limits with data through July 2019 for American Electric Power's Mountaineer Landfill. 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 began at Mountaineer Landfill for the CCR program in 2016, and 8 background samples were initially collected at each of the groundwater monitoring wells. The monitoring well network, as provided by Geosyntec Consultants, consists of the following:

- **Upgradient wells:** MW-1612 and MW-30; and
- **Downgradient wells:** MW-1611, MW-26, MW-27, MW-38, and MW-39.

Data were sent electronically to Groundwater Stats Consulting, and the background update report was reviewed by Dr. Kirk Cameron, PhD Statistician with MacStat Consulting, primary author of the USEPA Unified Guidance, and Senior Advisor to Groundwater Stats Consulting.

The following CCR Detection Monitoring constituents were evaluated:

- **Appendix III Parameters:** boron, calcium, chloride, fluoride, pH, sulfate, and TDS

Time series plots for Appendix III at all wells are provided for the purpose of screening data at these wells (Figure A). Additionally, box plots are included for all constituents at upgradient and downgradient wells (Figure B). The time series plots are used to initially screen for suspected outliers and trends, while the box plots provide visual representation of variation within individual wells and between all wells.

Data at all wells were evaluated during the initial background screening conducted in December 2017 for the following: 1) outliers; 2) trends; 3) most appropriate statistical method for Appendix III parameters based on site characteristics of groundwater data upgradient of the facility; and 4) eligibility of downgradient wells when introwell statistical methods are recommended.

Summary of Statistical Method:

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

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.

Summary of Background Screening Conducted in December 2017

Outlier Evaluation

Time series plots are used to identify suspected outliers, or extreme values that would result in limits that are not conservative from a regulatory perspective, in proposed background data. Suspected outliers at all wells for Appendix III were formally tested using Tukey's box plot method and, when identified, flagged in the computer database with "o" and deselected prior to construction of statistical limits. Those analyses were included in the background screening report.

Tukey's outlier test noted a few outliers. Any values flagged as outliers are plotted in a lighter font on the time series graph. The pH values reported during the May 2017 sample event were, reportedly, due to instrumentation error. The test identified two outliers for boron in well MW-27; an outlier for calcium in well MW-1611; a low outlier for pH in well MW-1611; and an outlier for TDS in well MW-1611. However, these values were not flagged due to all concentrations being consistent over time and similar to concentrations in neighboring wells. A substitution of the most recent reporting limit was applied when varying detection limits existed in data.

As mentioned above, 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.

No true seasonal patterns were observed on the time series plots for any of the detected data; therefore, no deseasonalizing adjustments were made to the data. When seasonal patterns are observed, data may be deseasonalized so that the resulting limits will correctly account for the seasonality as a predictable pattern rather than random variation or a release. It was noted that for the majority of constituents evaluated, the highest concentrations are reported in the upgradient wells.

While trends may be visual, a quantification of the trend and its significance is needed. The Sen's Slope/Mann Kendall trend test was used to evaluate all data at each well to identify statistically significant increasing or decreasing trends. In the absence of suspected contamination, significant trending data are typically not included as part of the background data used for construction of prediction limits. This step serves to eliminate the trend and, thus, reduce variation in background. When statistically

significant decreasing trends are present, earlier data are evaluated to determine whether earlier concentration levels are significantly different than current reported concentrations and will be deselected as necessary. When the historical records of data are truncated for the reasons above, a summary report will be provided to show the date ranges used in construction of the statistical limits.

The results of the trend analyses showed all data are consistent over time with no statistically significant increasing trends. A few statistically significant decreasing trends were noted; however, the magnitudes of the trends were low relative to the average concentrations, as may be seen on the Trend Test Summary table. It was noted that boron, sulfate, and TDS concentrations are found to have the highest concentrations in the upgradient wells. No adjustments to any data sets were required at this time.

Appendix III – Determination of Spatial Variation

The Analysis of Variance (ANOVA) was used to statistically evaluate differences in average concentrations among upgradient wells, which assists in identifying the most appropriate statistical approach. Interwell tests, which compare downgradient well data to statistical limits constructed from pooled upgradient well data, are appropriate when average concentrations are similar across upgradient wells. Intrawell tests, which compare compliance data from a single well to screened historical data within the same well, are appropriate when upgradient wells exhibit spatial variation; when statistical limits constructed from upgradient wells would not be conservative from a regulatory perspective; and when downgradient water quality is unimpacted compared to upgradient water quality for the same parameter.

Appendix III - Statistical Limits

Intrawell limits constructed from carefully screened background data from within each well serve to provide statistical limits that are conservative (i.e. lower) from a regulatory perspective, and that will rapidly identify a change in more recent compliance data from within a given well. This statistical method removes the element of variation from across wells and eliminates the chance of mistaking natural spatial variation for a release from the facility. Prior to performing intrawell prediction limits, several steps are required to reasonably demonstrate downgradient water quality does not have existing impacts from the practices of the facility.

In cases where downgradient average concentrations are higher than observed concentrations upgradient for a given constituent, an independent study and hydrogeological investigation would be required to identify local geochemical

conditions and expected groundwater quality for the region to justify an intrawell approach. Such an assessment is beyond the scope of services provided by Groundwater Stats Consulting. When there is not an obvious explanation for observed concentration differences in downgradient wells relative to reported concentrations in upgradient wells, interwell prediction limits will initially be selected for the statistical method until further evidence shows that concentrations are due to natural variation rather than a result of the facility.

Confidence Intervals for boron, chloride, sulfate, and TDS were found to be within their respective background limits and are, therefore, eligible for intrawell prediction limits. Interwell prediction limits were initially recommended for calcium, fluoride, and pH. However, additional studies provided by Geosyntec Consultants support natural variation in groundwater for calcium and pH; therefore, interwell methods will be used for fluoride only.

All available data through June 2017, for parameters mentioned above, at each well were used to establish intrawell background limits based on a 1-of-2 resample plan that will be used for future comparisons. Interwell prediction limits for fluoride as described above, combined with a 1-of-2 resample plan, were constructed from upgradient wells.

Natural systems continuously evolve due to physical changes made to the environment. Examples include capping a landfill, paving areas near a well, or lining a drainage channel to prevent erosion. Periodic updating of background statistical limits will be necessary to accommodate these types of changes. In the intrawell case, data are evaluated when at least 4 new compliance values are available. In the interwell case, newer data are carefully evaluated during each event for new outliers, and prediction limits are constructed using all available data from upgradient wells.

October 2019 - Background Update

Data were re-evaluated using Tukey's outlier test and visual screening with the July 2019 samples. Fluoride is tested using interwell prediction limits and, therefore, only upgradient wells were tested for outliers for this constituent (Figure C). All other Appendix III parameters, which use intrawell prediction limits, were tested for each well (Figure C). In addition to the pH values previously flagged as outliers due to reported instrumentation error for those samples, a low value was noted for fluoride in MW-30 and high values were noted for calcium in well MW-27 and sulfate in well MW-39. These values were flagged in the database as outliers. Tukey's also identified a high value for fluoride in the pooled upgradient well data; however, this value was similar to concentrations reported in neighboring wells and was not flagged as an outlier in the

database. A similar occurrence was present for TDS in well MW-27, but this value was not flagged in the database as an outlier. It is consistent with the other reported values in this well and the concentrations overall are significantly less than those reported in at least one upgradient well. However, a high sulfate value in well MW-39 was not identified by Tukey's due to the natural log transformation, but this value was flagged as an outlier as this sample did not appear to represent the population for this well/constituent pair.

For constituents requiring intrawell prediction limits, the Mann-Whitney (Wilcoxon Rank Sum) test was used to compare the medians of historical data through June 2017 to the new compliance samples at each well through July 2019 to evaluate whether the groups are statistically different at the 99% confidence level, in which case background data may not be updated with more recent compliance data (Figure D). Statistically significant differences were found for TDS in well MW-26.

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 the case of TDS at well MW-26, concentrations are lower than those reported in at least one upgradient well and were, therefore, updated. 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 reported through July 2019, combined with a 1-of-2 resample plan, were constructed and a summary of the updated limits follows this letter (Figure E).

The Sen's Slope/Mann Kendall trend test was used to evaluate data at upgradient wells for fluoride to identify statistically significant increasing or decreasing trends. The results of the trend analyses showed all data are consistent over time with no statistically significant increasing or decreasing trends (Figure F).

Interwell prediction limits, combined with a 1-of-2 resample plan, were updated using all available data from upgradient wells for the same time period for fluoride (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.

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

For Groundwater Stats Consulting,



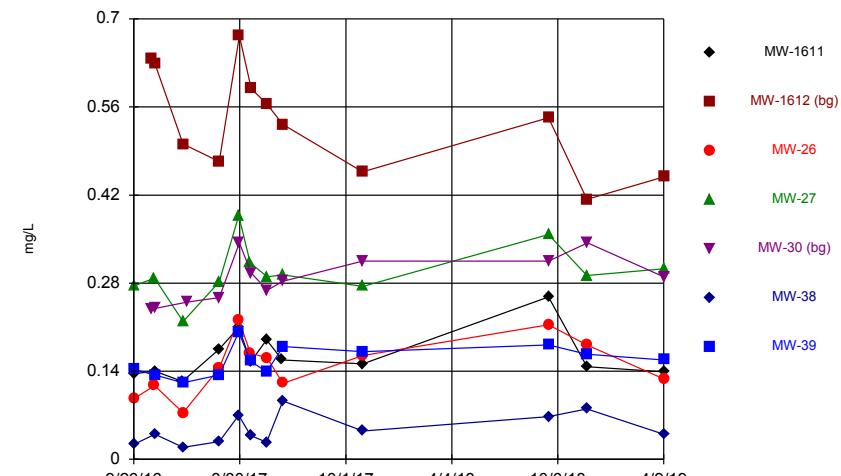
Andrew T. Collins
Groundwater Analyst



Kristina L. Rayner
Groundwater Statistician

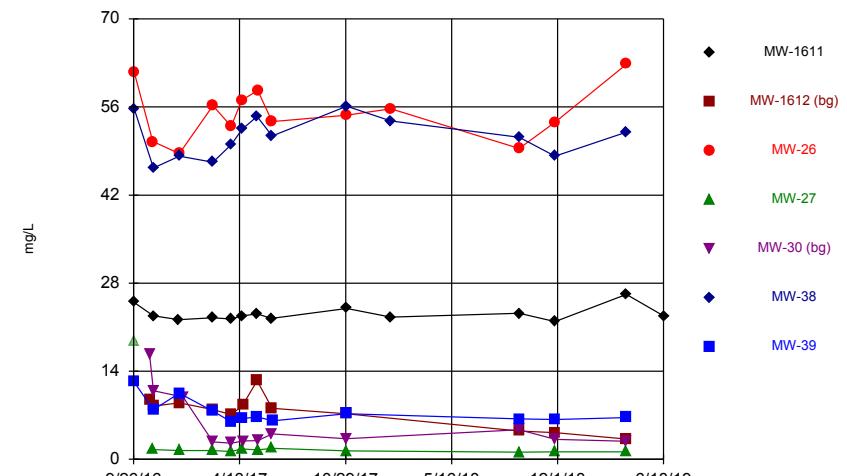
FIGURE A: TIME SERIES

Time Series



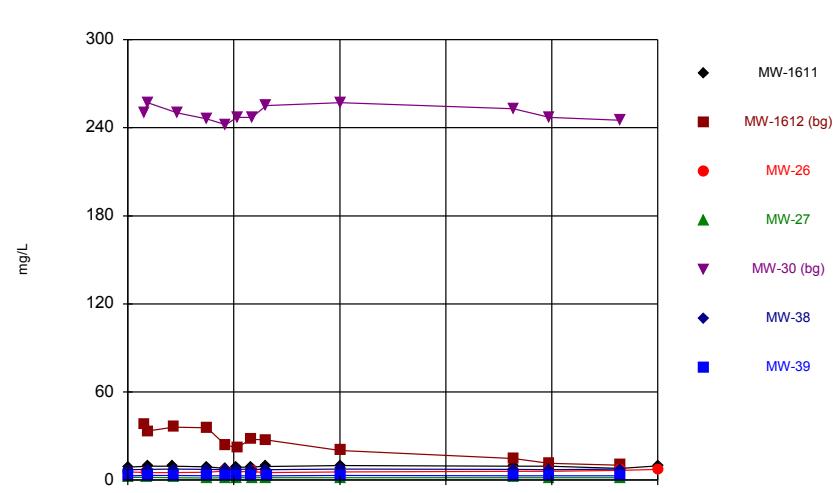
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Time Series



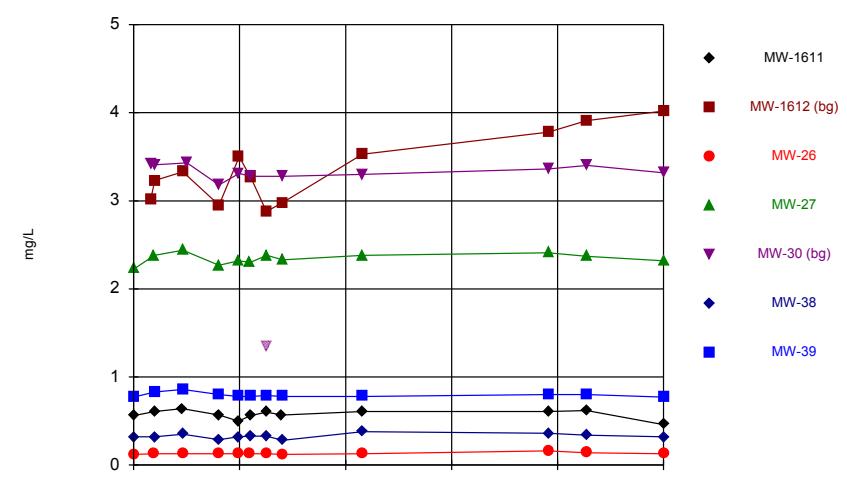
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Time Series



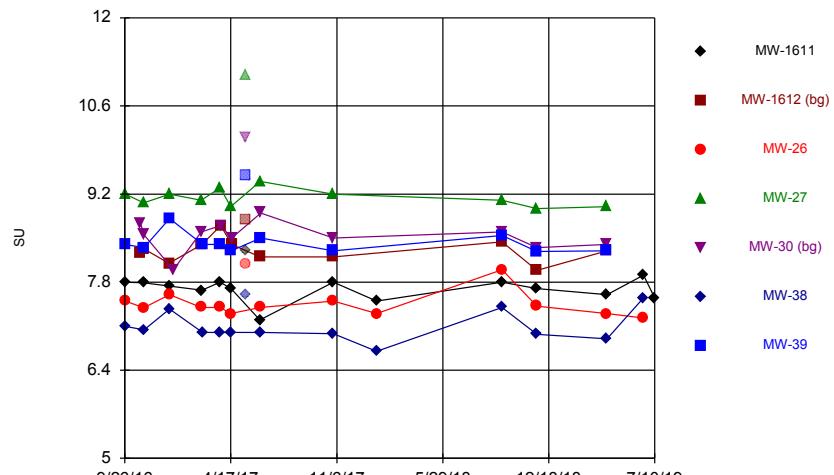
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Time Series



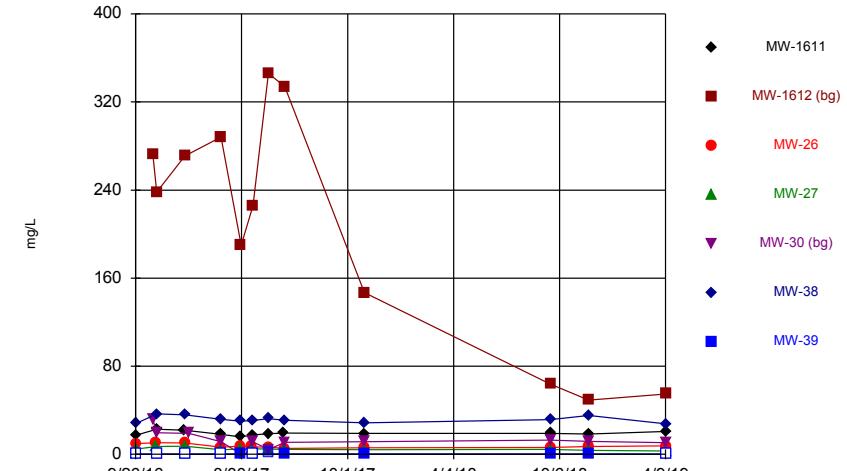
Constituent: Fluoride, total Analysis Run 11/22/2019 9:04 AM
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Time Series



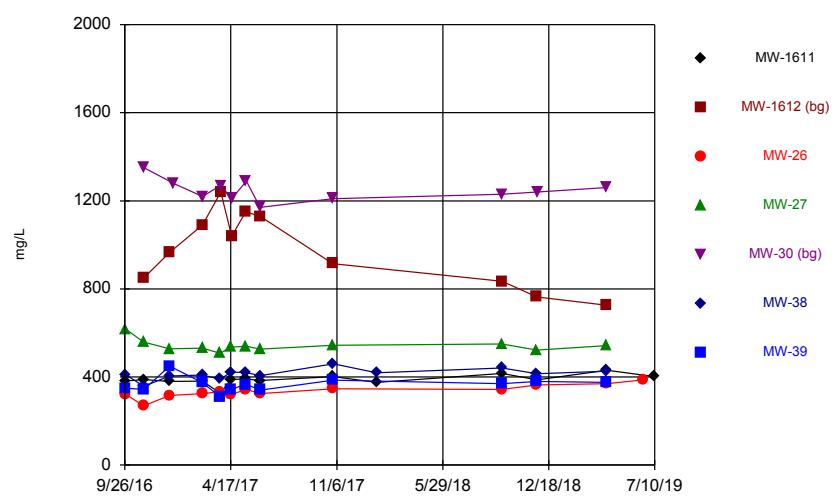
Constituent: pH, field Analysis Run 11/22/2019 9:04 AM
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Time Series



Constituent: Sulfate, total Analysis Run 11/22/2019 9:04 AM
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

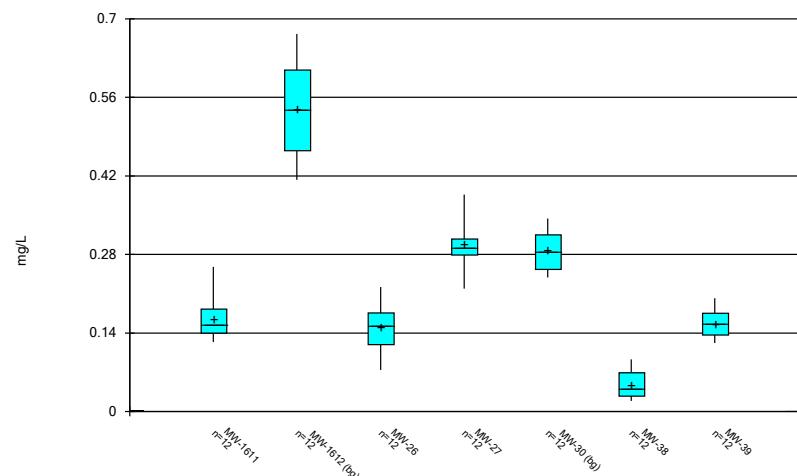
Time Series



Constituent: Total Dissolved Solids [TDS] Analysis Run 11/22/2019 9:04 AM
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

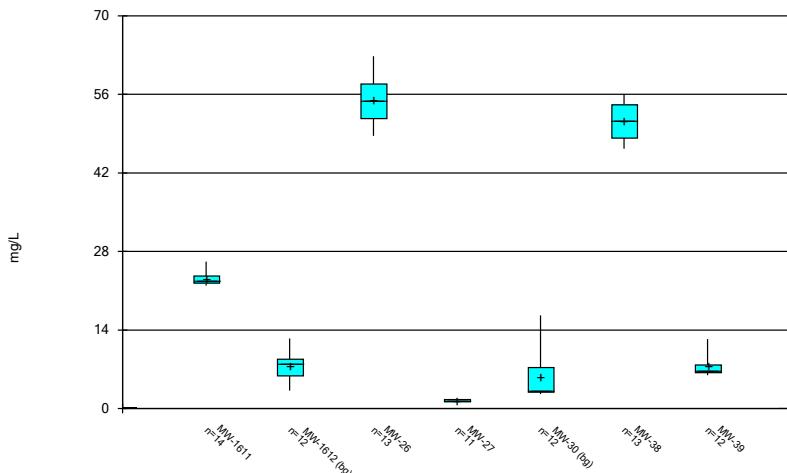
FIGURE B: BOX PLOTS

Box & Whiskers Plot



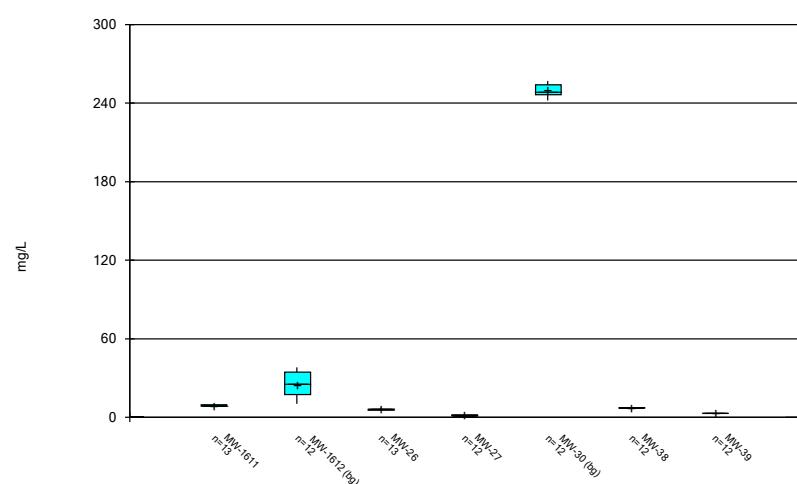
Constituent: Boron, total Analysis Run 11/22/2019 9:07 AM
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Box & Whiskers Plot



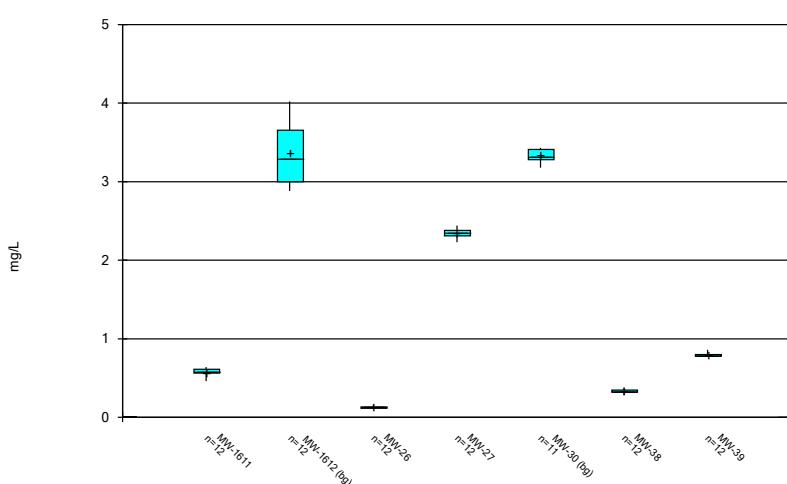
Constituent: Calcium, total Analysis Run 11/22/2019 9:07 AM
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Box & Whiskers Plot



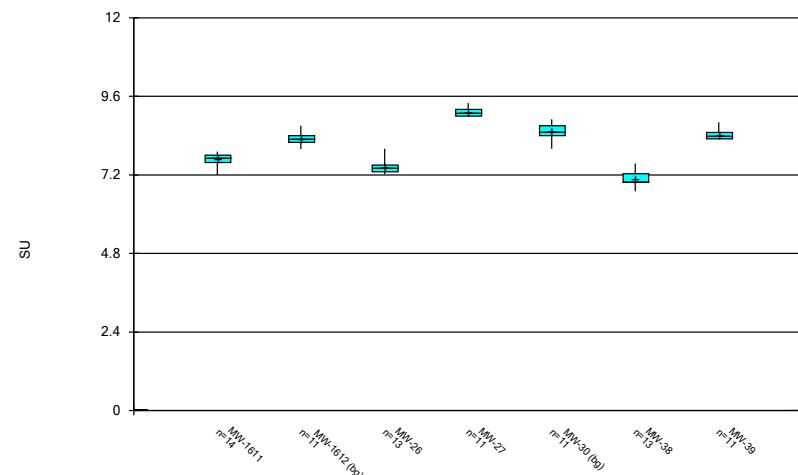
Constituent: Chloride, total Analysis Run 11/22/2019 9:07 AM
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Box & Whiskers Plot



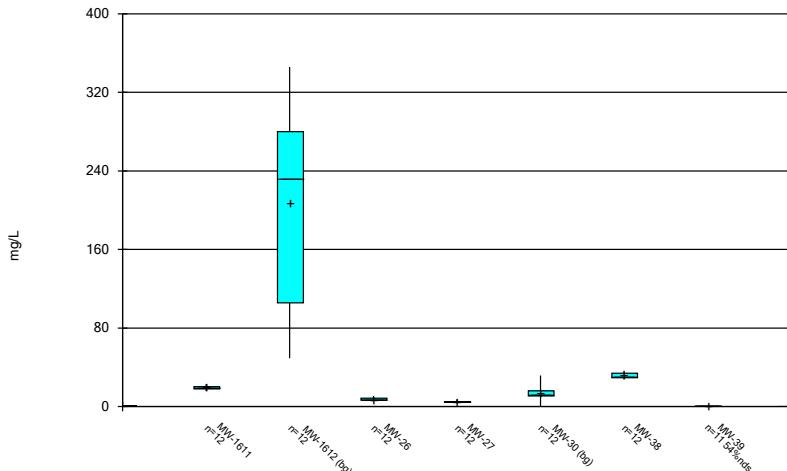
Constituent: Fluoride, total Analysis Run 11/22/2019 9:07 AM
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Box & Whiskers Plot



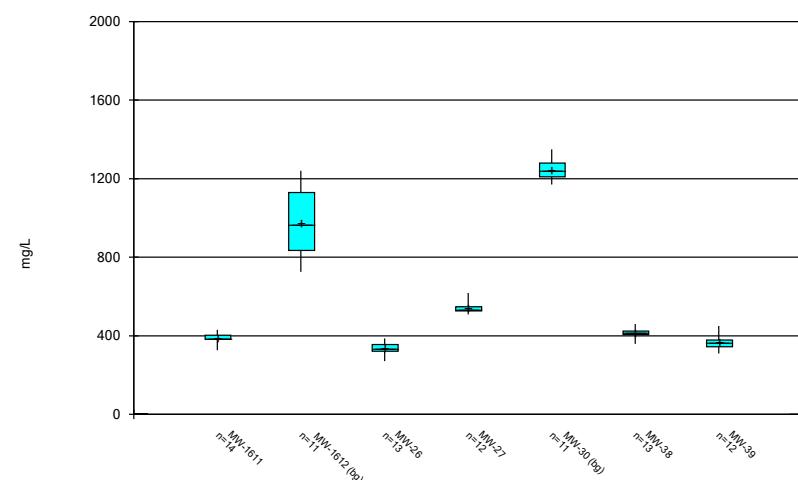
Constituent: pH, field Analysis Run 11/22/2019 9:07 AM
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Box & Whiskers Plot



Constituent: Sulfate, total Analysis Run 11/22/2019 9:07 AM
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Box & Whiskers Plot



Constituent: Total Dissolved Solids [TDS] Analysis Run 11/22/2019 9:07 AM
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

FIGURE C: OUTLIER SUMMARY

Outlier Summary

Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill Printed 11/22/2019, 9:10 AM

| | MW-27 Calcium, total (mg/L) | MW-30 Fluoride, total (mg/L) | MW-1611 pH, field (SU) | MW-1612 pH, field (SU) | MW-26 pH, field (SU) | MW-27 pH, field (SU) | MW-30 pH, field (SU) | MW-38 pH, field (SU) | MW-39 pH, field (SU) | MW-39 Sulfate, total (mg/L) |
|-----------|-----------------------------|------------------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|-----------------------------|
| 9/27/2016 | 18.9 (o) | | | | | | | | | |
| 5/16/2017 | | 8.3 (o) | 8.8 (o) | | | | 7.6 (o) | 9.5 (o) | 1.5 (o) | |
| 5/17/2017 | | 1.34 (o) | | | 8.09 (o) | 11.1 (o) | 10.1 (o) | | | |

Upgradient Outlier Analysis - All Results

Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill Printed 10/7/2019, 4:23 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> |
|------------------------|---------------|----------------|-----------------|-------------------|---------------|--------------|----------|-------------|------------------|---------------------|-----------------------|
| Fluoride, total (mg/L) | MW-1612,MW-30 | Yes | 4.02,1.34 | n/a w/combined bg | NP | NaN | 24 | 3.268 | 0.493 | x^4 | ShapiroWilk |

Outlier Analysis - Significant Results

Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill Printed 10/7/2019, 4:21 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> |
|-------------------------------------|-------------|----------------|-----------------|----------------|---------------|--------------|----------|-------------|------------------|---------------------|-----------------------|
| Calcium, total (mg/L) | MW-27 | Yes | 18.9 | 9/27/2016 | NP | NaN | 12 | 2.858 | 5.056 | In(x) | ShapiroWilk |
| pH, field (SU) | MW-27 | Yes | 11.1 | 5/17/2017 | NP | NaN | 12 | 9.303 | 0.5805 | In(x) | ShapiroWilk |
| pH, field (SU) | MW-30 (bg) | Yes | 10.1 | 5/17/2017 | NP | NaN | 12 | 8.662 | 0.5053 | In(x) | ShapiroWilk |
| pH, field (SU) | MW-39 | Yes | 9.5 | 5/16/2017 | NP | NaN | 12 | 8.508 | 0.3456 | In(x) | ShapiroWilk |
| Total Dissolved Solids [TDS] (mg/L) | MW-27 | Yes | 618 | 9/27/2016 | NP | NaN | 12 | 541.8 | 27.43 | In(x) | ShapiroWilk |

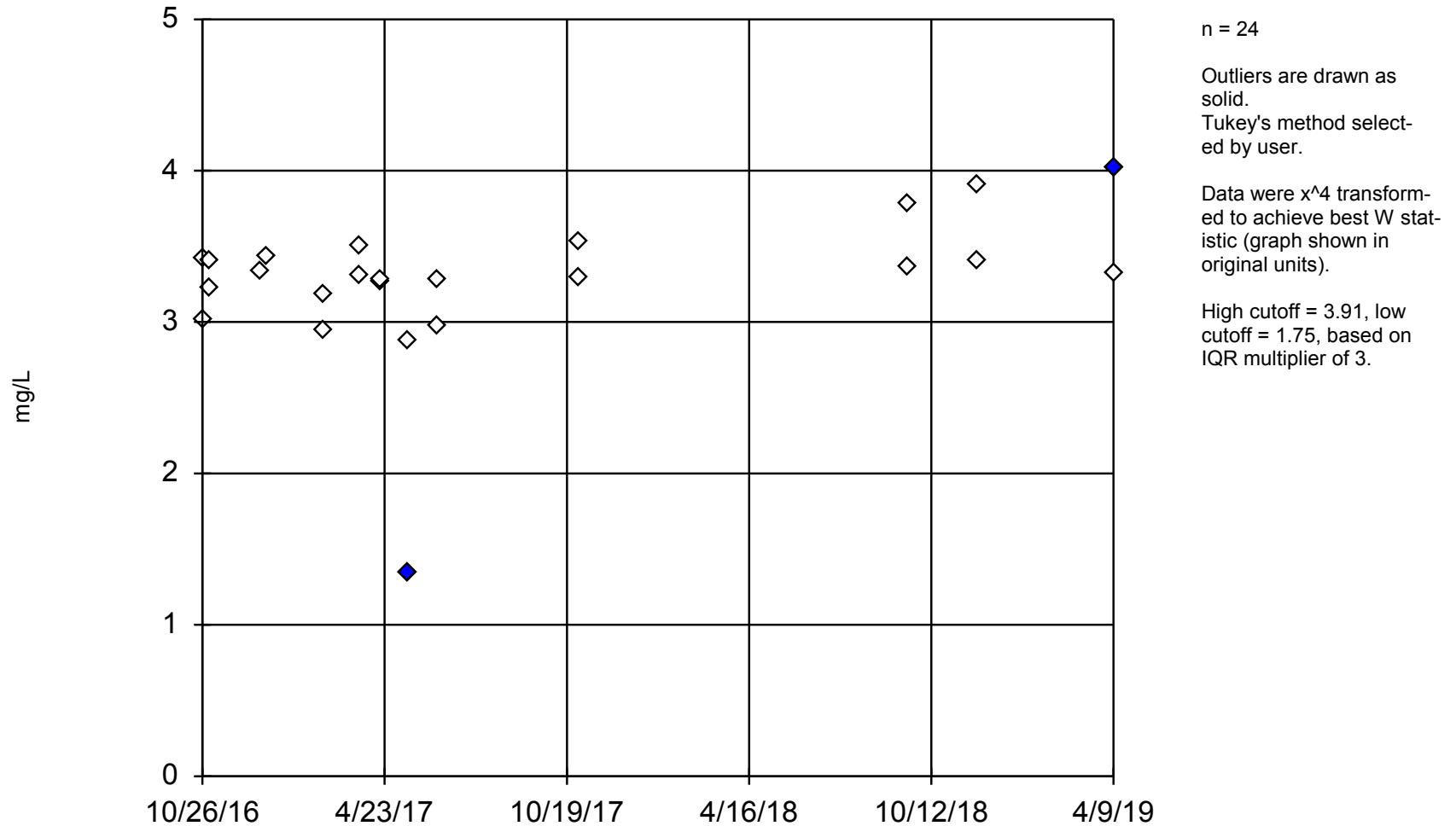
Outlier Analysis - All Results

Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill Printed 10/7/2019, 4:21 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> |
|--|-------------------|----------------|-----------------|------------------|---------------|--------------|-----------|--------------|------------------|---------------------|-----------------------|
| Boron, total (mg/L) | MW-1611 | No | n/a | n/a | NP | NaN | 12 | 0.1653 | 0.03797 | ln(x) | ShapiroWilk |
| Boron, total (mg/L) | MW-1612 (bg) | No | n/a | n/a | NP | NaN | 12 | 0.5384 | 0.08279 | x^(1/3) | ShapiroWilk |
| Boron, total (mg/L) | MW-26 | No | n/a | n/a | NP | NaN | 12 | 0.1496 | 0.04475 | normal | ShapiroWilk |
| Boron, total (mg/L) | MW-27 | No | n/a | n/a | NP | NaN | 12 | 0.2978 | 0.04195 | ln(x) | ShapiroWilk |
| Boron, total (mg/L) | MW-30 (bg) | No | n/a | n/a | NP | NaN | 12 | 0.2868 | 0.03727 | ln(x) | ShapiroWilk |
| Boron, total (mg/L) | MW-38 | No | n/a | n/a | NP | NaN | 12 | 0.04767 | 0.02417 | ln(x) | ShapiroWilk |
| Boron, total (mg/L) | MW-39 | No | n/a | n/a | NP | NaN | 12 | 0.1573 | 0.02381 | ln(x) | ShapiroWilk |
| Calcium, total (mg/L) | MW-1611 | No | n/a | n/a | NP | NaN | 14 | 23.13 | 1.186 | ln(x) | ShapiroWilk |
| Calcium, total (mg/L) | MW-1612 (bg) | No | n/a | n/a | NP | NaN | 12 | 7.524 | 2.557 | normal | ShapiroWilk |
| Calcium, total (mg/L) | MW-26 | No | n/a | n/a | NP | NaN | 13 | 55.02 | 4.312 | ln(x) | ShapiroWilk |
| Calcium, total (mg/L) | MW-27 | Yes | 18.9 | 9/27/2016 | NP | NaN | 12 | 2.858 | 5.056 | ln(x) | ShapiroWilk |
| Calcium, total (mg/L) | MW-30 (bg) | No | n/a | n/a | NP | NaN | 12 | 5.554 | 4.484 | ln(x) | ShapiroWilk |
| Calcium, total (mg/L) | MW-38 | No | n/a | n/a | NP | NaN | 13 | 51.32 | 3.209 | normal | ShapiroWilk |
| Calcium, total (mg/L) | MW-39 | No | n/a | n/a | NP | NaN | 12 | 7.534 | 1.961 | ln(x) | ShapiroWilk |
| Chloride, total (mg/L) | MW-1611 | No | n/a | n/a | NP | NaN | 13 | 9.078 | 0.5843 | x^6 | ShapiroWilk |
| Chloride, total (mg/L) | MW-1612 (bg) | No | n/a | n/a | NP | NaN | 12 | 25.08 | 9.687 | normal | ShapiroWilk |
| Chloride, total (mg/L) | MW-26 | No | n/a | n/a | NP | NaN | 13 | 5.813 | 0.638 | ln(x) | ShapiroWilk |
| Chloride, total (mg/L) | MW-27 | No | n/a | n/a | NP | NaN | 12 | 1.634 | 0.1156 | ln(x) | ShapiroWilk |
| Chloride, total (mg/L) | MW-30 (bg) | No | n/a | n/a | NP | NaN | 12 | 249.7 | 4.887 | ln(x) | ShapiroWilk |
| Chloride, total (mg/L) | MW-38 | No | n/a | n/a | NP | NaN | 12 | 7.264 | 0.1812 | ln(x) | ShapiroWilk |
| Chloride, total (mg/L) | MW-39 | No | n/a | n/a | NP | NaN | 12 | 2.981 | 0.05384 | ln(x) | ShapiroWilk |
| pH, field (SU) | MW-1611 | No | n/a | n/a | NP | NaN | 15 | 7.724 | 0.2343 | ln(x) | ShapiroWilk |
| pH, field (SU) | MW-1612 (bg) | No | n/a | n/a | NP | NaN | 12 | 8.344 | 0.2304 | ln(x) | ShapiroWilk |
| pH, field (SU) | MW-26 | No | n/a | n/a | NP | NaN | 14 | 7.488 | 0.2553 | ln(x) | ShapiroWilk |
| pH, field (SU) | MW-27 | Yes | 11.1 | 5/17/2017 | NP | NaN | 12 | 9.303 | 0.5805 | ln(x) | ShapiroWilk |
| pH, field (SU) | MW-30 (bg) | Yes | 10.1 | 5/17/2017 | NP | NaN | 12 | 8.662 | 0.5053 | ln(x) | ShapiroWilk |
| pH, field (SU) | MW-38 | No | n/a | n/a | NP | NaN | 14 | 7.115 | 0.2612 | ln(x) | ShapiroWilk |
| pH, field (SU) | MW-39 | Yes | 9.5 | 5/16/2017 | NP | NaN | 12 | 8.508 | 0.3456 | ln(x) | ShapiroWilk |
| Sulfate, total (mg/L) | MW-1611 | No | n/a | n/a | NP | NaN | 12 | 19.03 | 1.94 | ln(x) | ShapiroWilk |
| Sulfate, total (mg/L) | MW-1612 (bg) | No | n/a | n/a | NP | NaN | 12 | 206.7 | 106.2 | x^2 | ShapiroWilk |
| Sulfate, total (mg/L) | MW-26 | No | n/a | n/a | NP | NaN | 12 | 7.467 | 1.739 | ln(x) | ShapiroWilk |
| Sulfate, total (mg/L) | MW-27 | No | n/a | n/a | NP | NaN | 12 | 4.817 | 1.278 | ln(x) | ShapiroWilk |
| Sulfate, total (mg/L) | MW-30 (bg) | No | n/a | n/a | NP | NaN | 12 | 12.91 | 7.883 | normal | ShapiroWilk |
| Sulfate, total (mg/L) | MW-38 | No | n/a | n/a | NP | NaN | 12 | 31.63 | 2.941 | ln(x) | ShapiroWilk |
| Sulfate, total (mg/L) | MW-39 | No | n/a | n/a | NP | NaN | 12 | 0.21 | 0.4099 | ln(x) | ShapiroWilk |
| Total Dissolved Solids [TDS] (mg/L) | MW-1611 | No | n/a | n/a | NP | NaN | 14 | 388.2 | 23.52 | x^4 | ShapiroWilk |
| Total Dissolved Solids [TDS] (mg/L) | MW-1612 (bg) | No | n/a | n/a | NP | NaN | 11 | 973.1 | 169.8 | normal | ShapiroWilk |
| Total Dissolved Solids [TDS] (mg/L) | MW-26 | No | n/a | n/a | NP | NaN | 13 | 335.8 | 29.2 | x^3 | ShapiroWilk |
| Total Dissolved Solids [TDS] (mg/L) | MW-27 | Yes | 618 | 9/27/2016 | NP | NaN | 12 | 541.8 | 27.43 | ln(x) | ShapiroWilk |
| Total Dissolved Solids [TDS] (mg/L) | MW-30 (bg) | No | n/a | n/a | NP | NaN | 11 | 1248 | 48.95 | ln(x) | ShapiroWilk |
| Total Dissolved Solids [TDS] (mg/L) | MW-38 | No | n/a | n/a | NP | NaN | 13 | 414 | 24.27 | x^3 | ShapiroWilk |
| Total Dissolved Solids [TDS] (mg/L) | MW-39 | No | n/a | n/a | NP | NaN | 12 | 365.8 | 34.14 | ln(x) | ShapiroWilk |

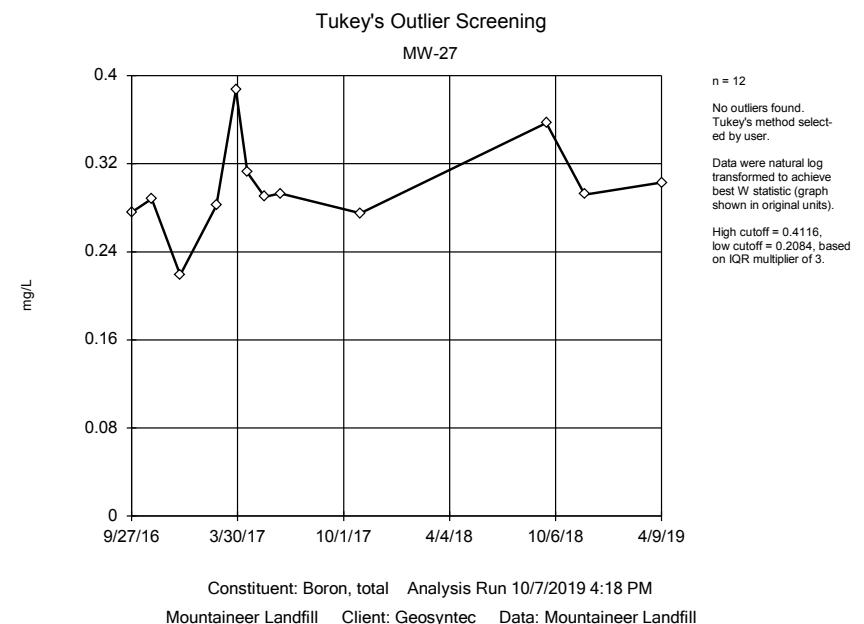
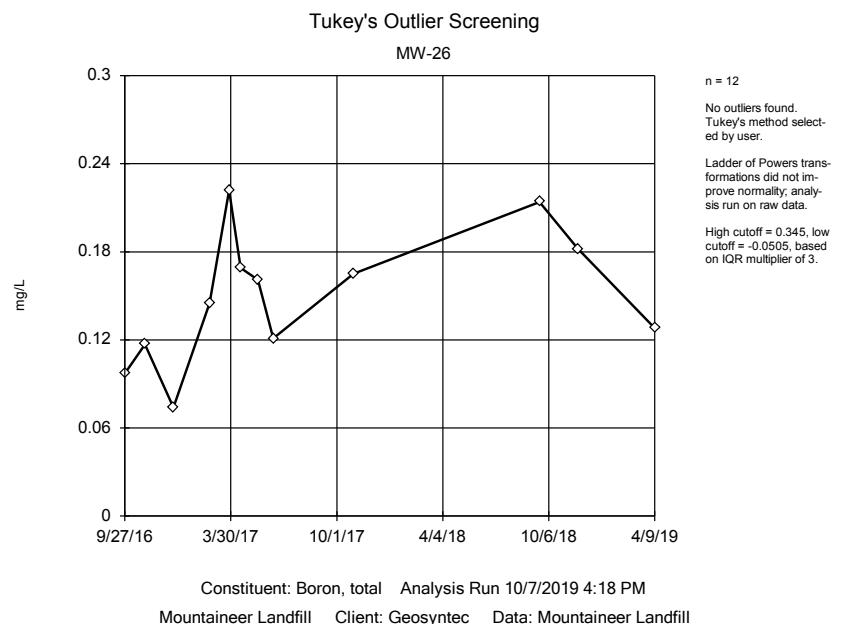
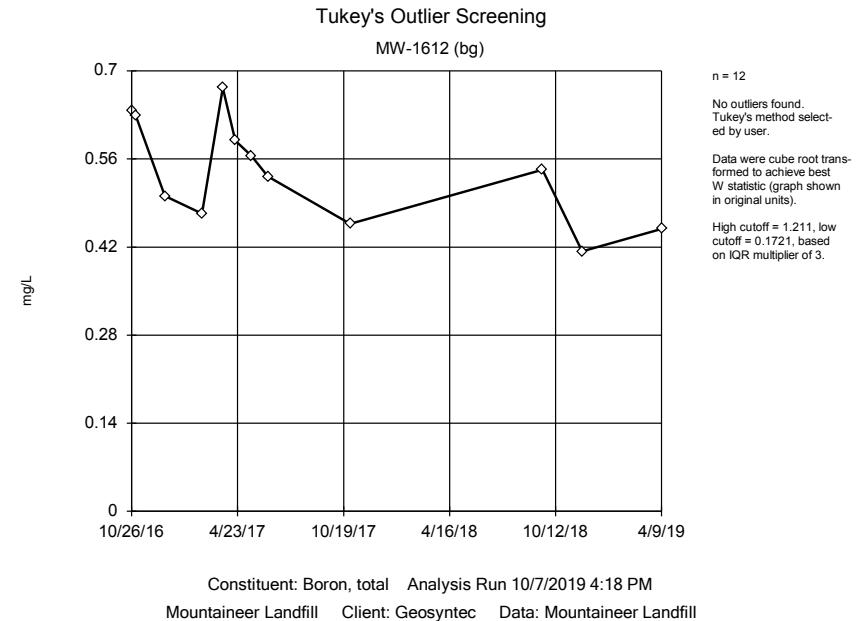
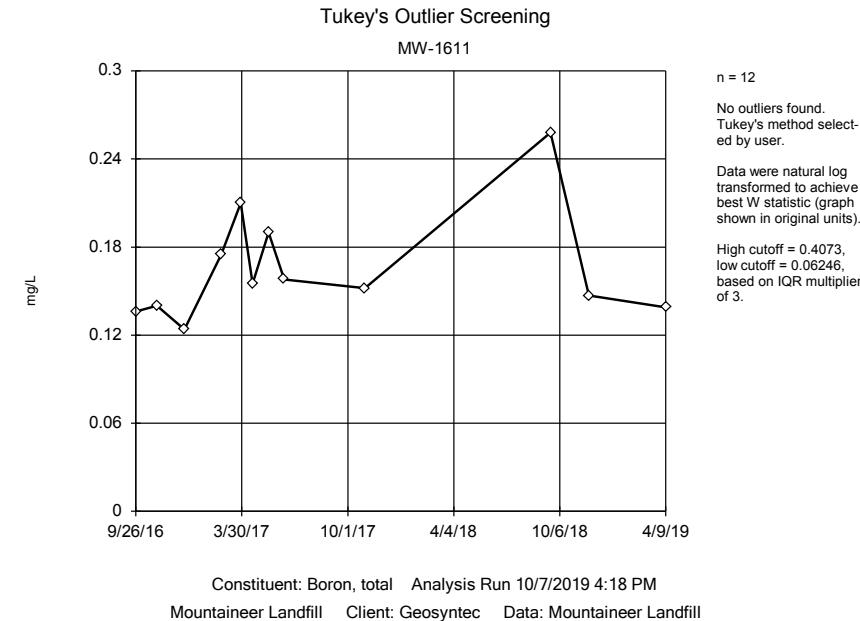
Tukey's Outlier Screening, Pooled Background

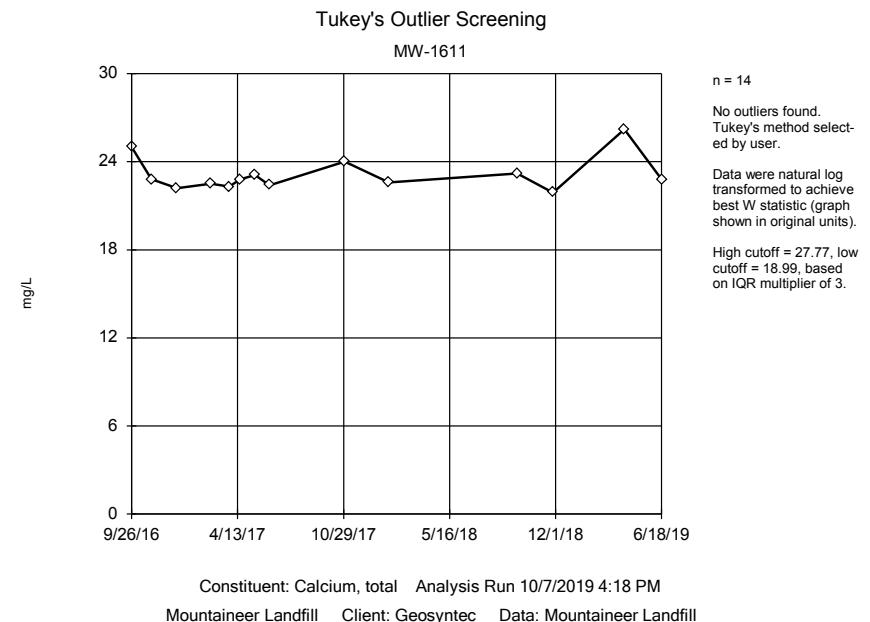
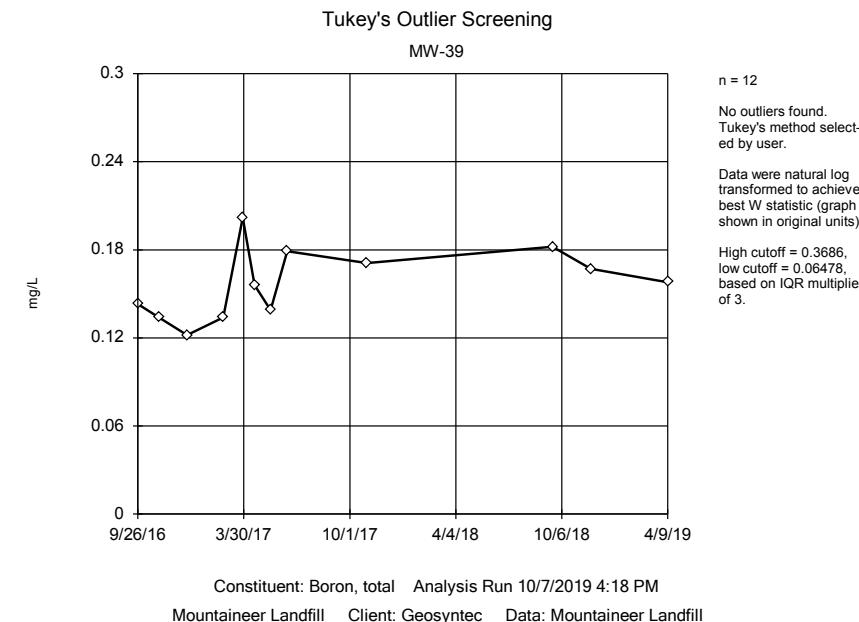
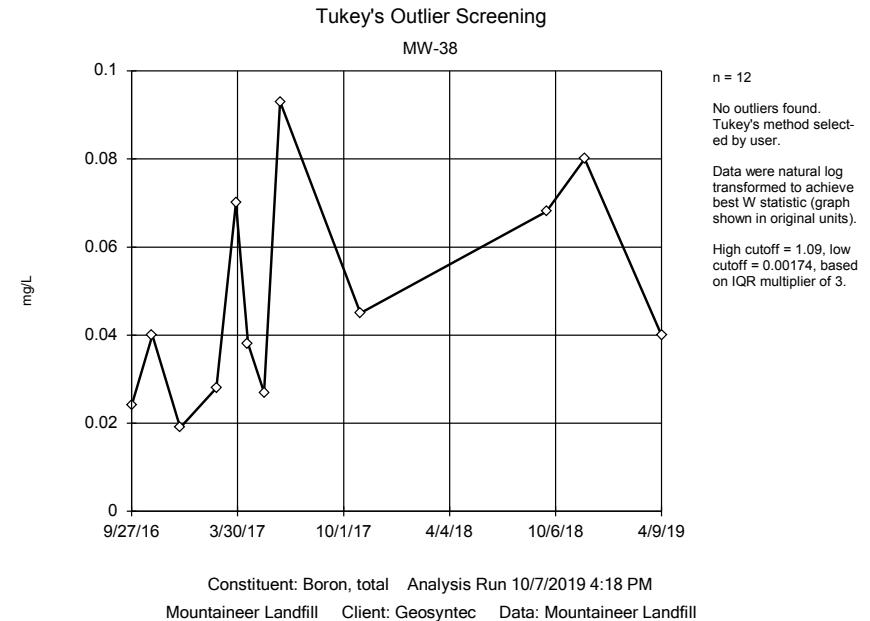
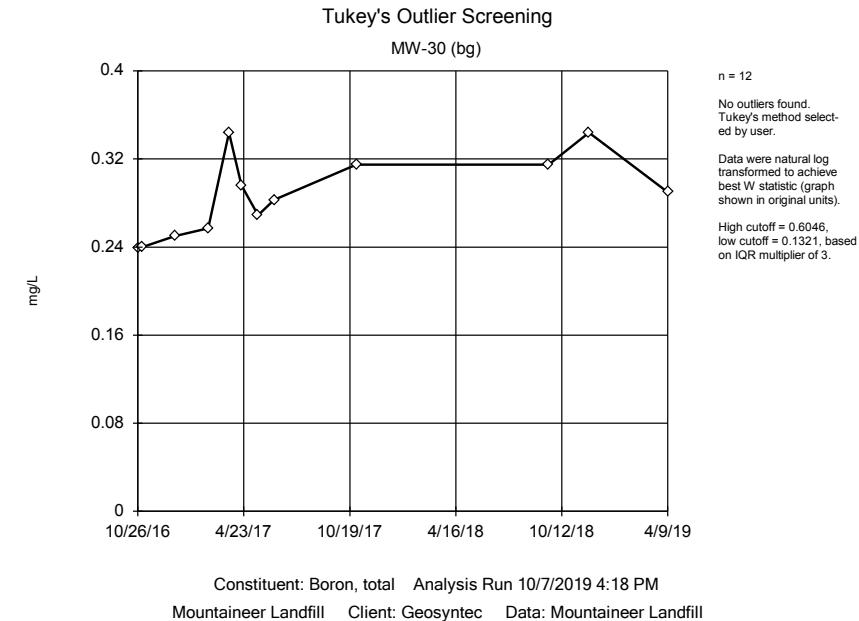
MW-1612,MW-30

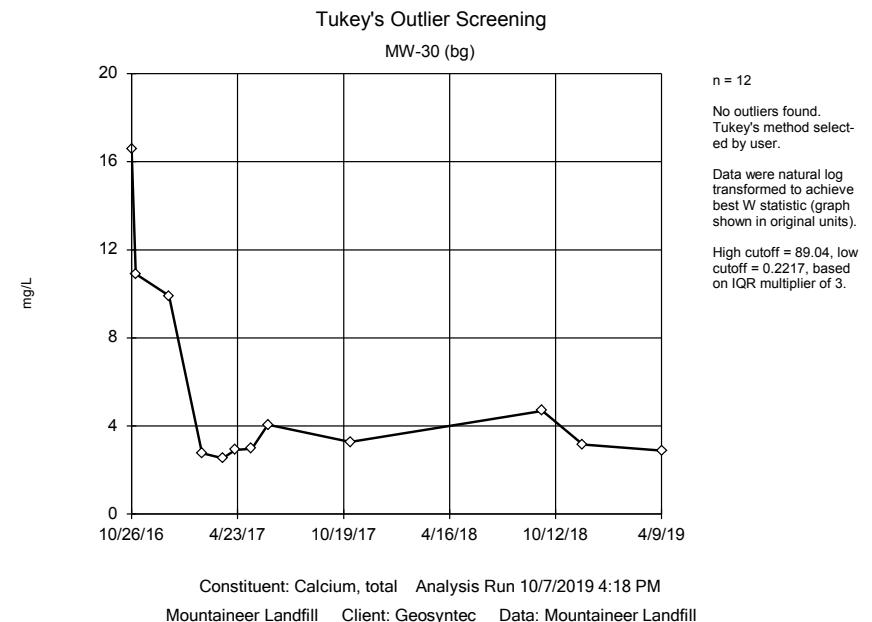
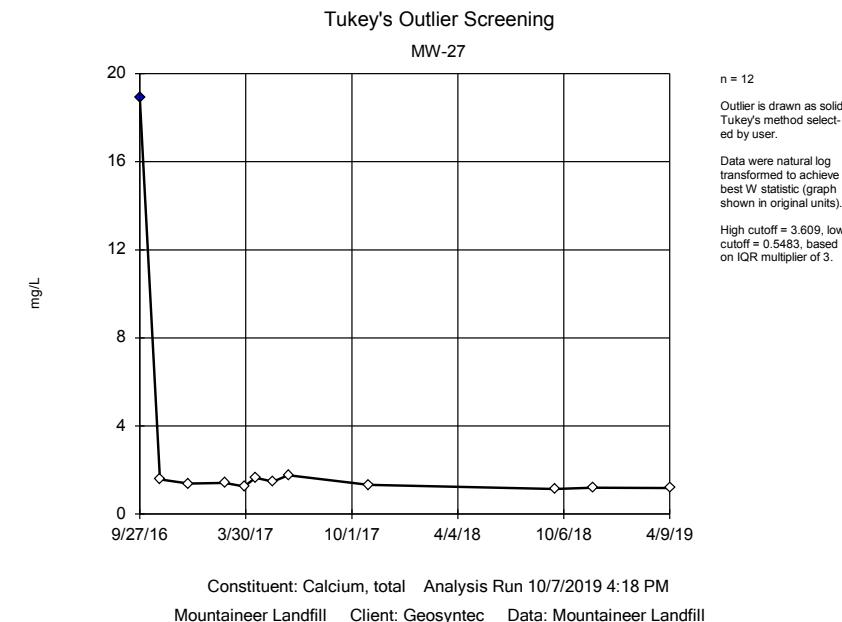
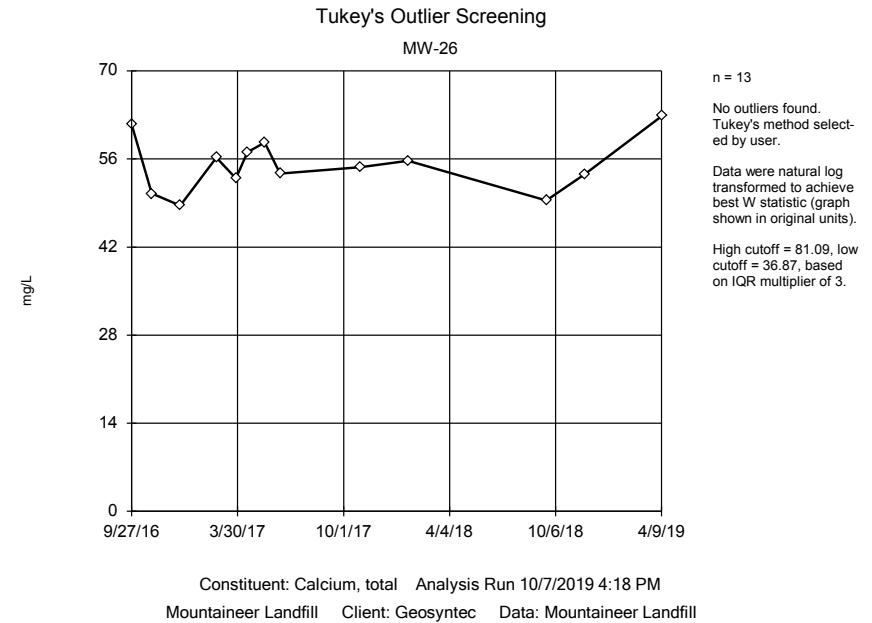
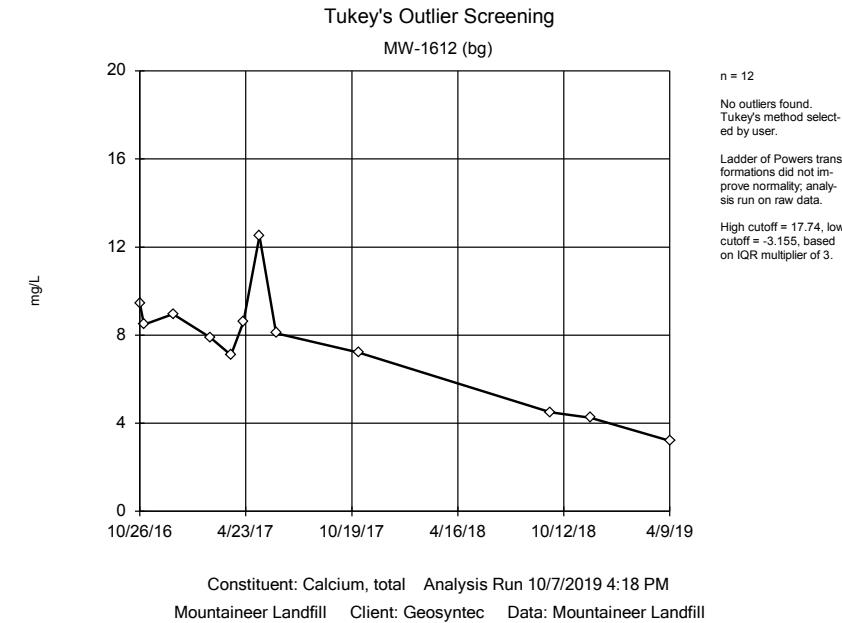


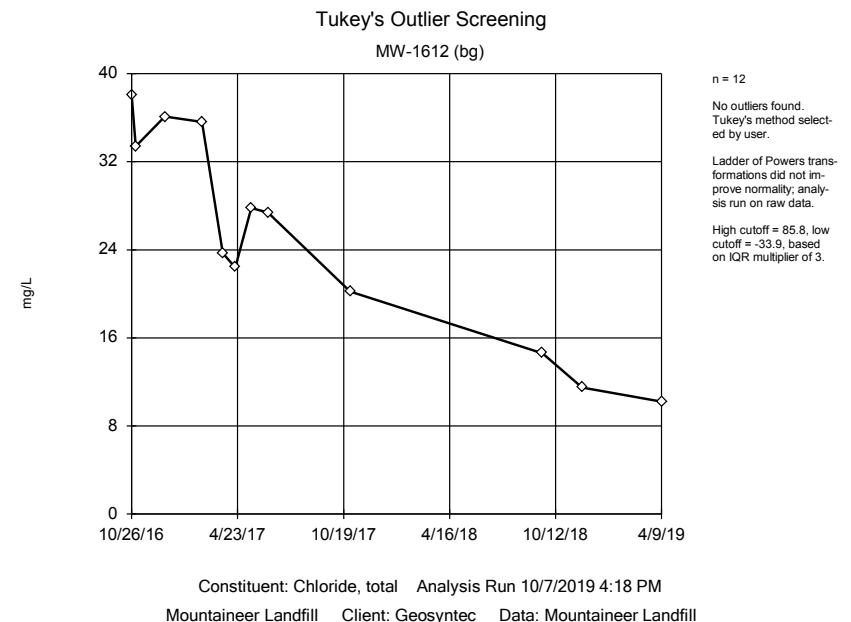
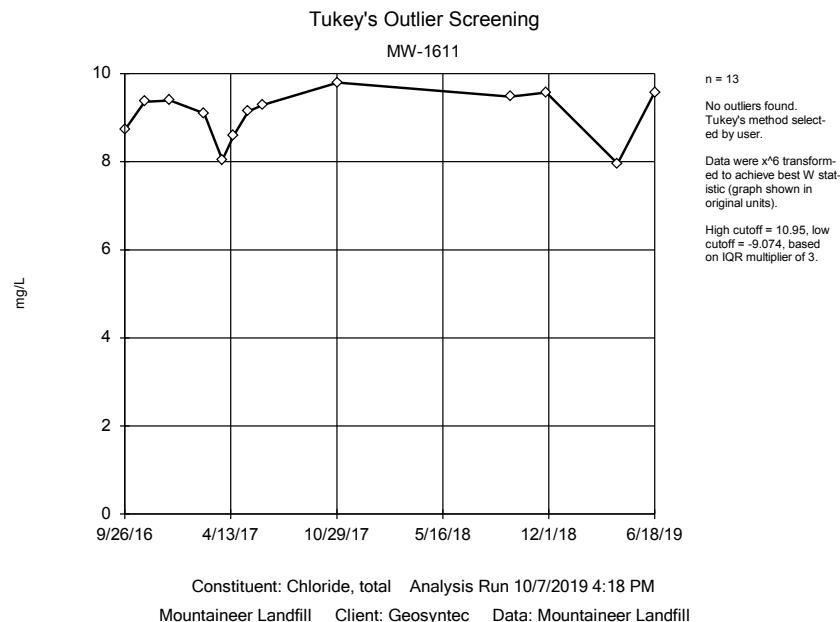
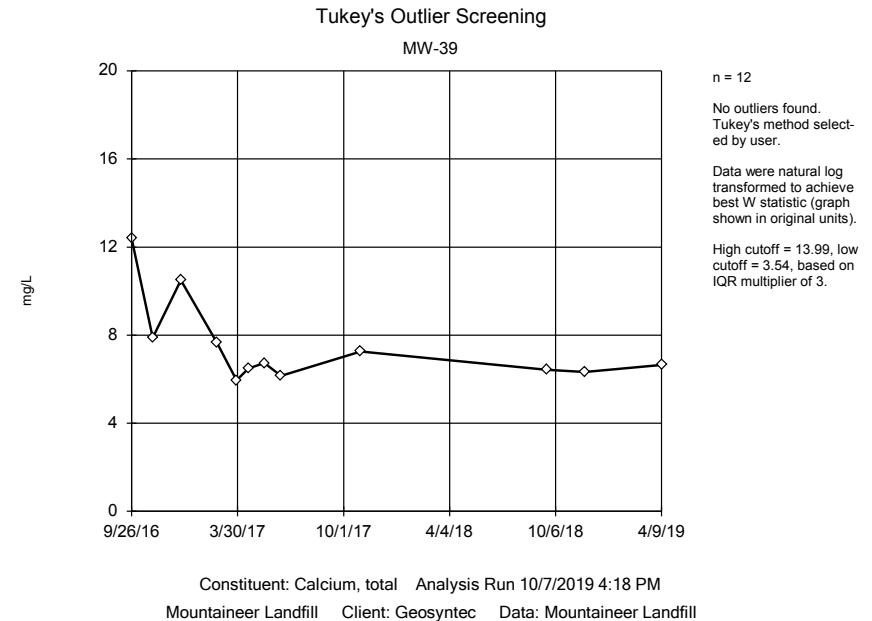
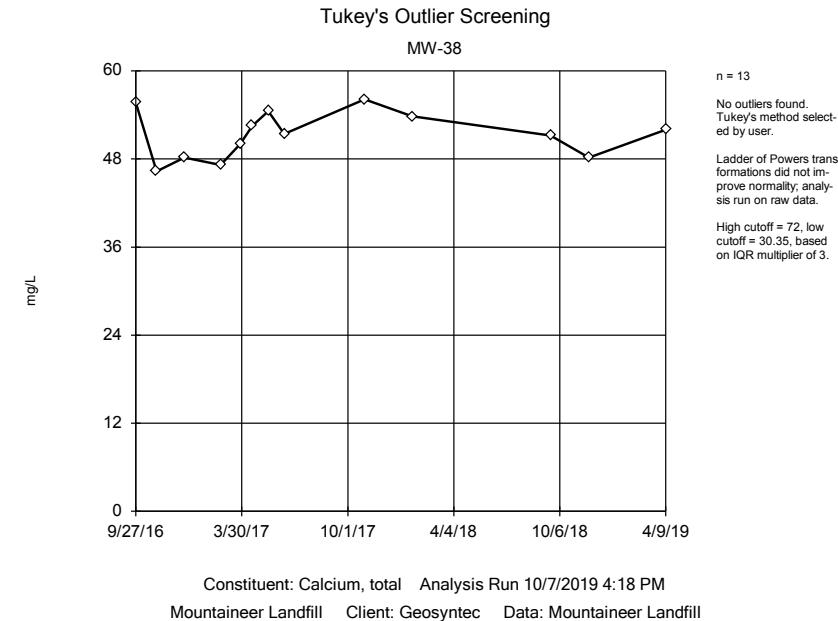
Constituent: Fluoride, total Analysis Run 10/7/2019 4:23 PM

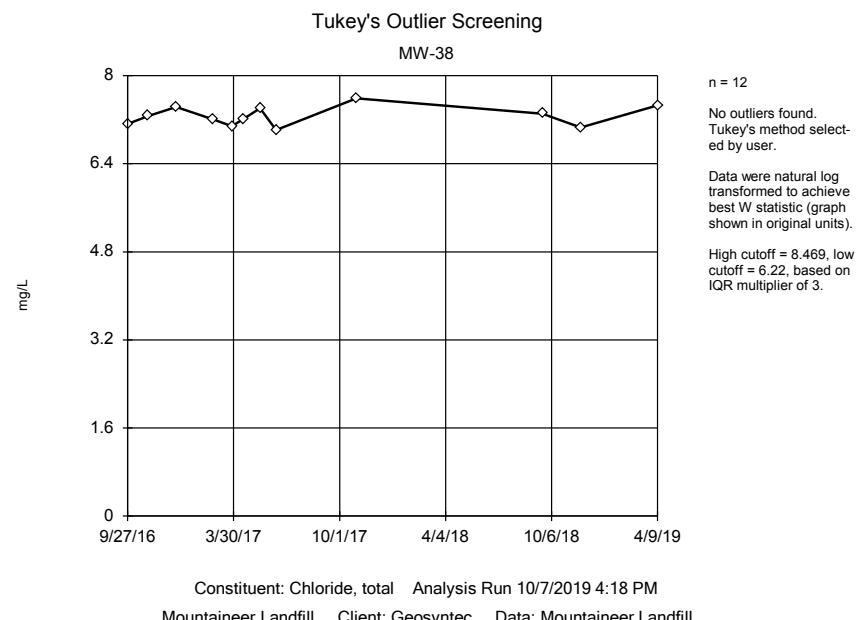
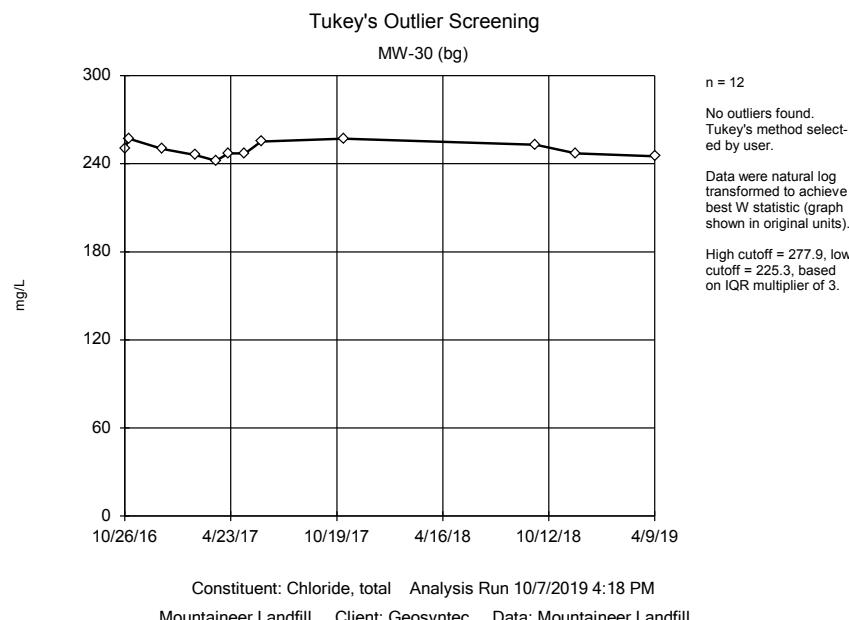
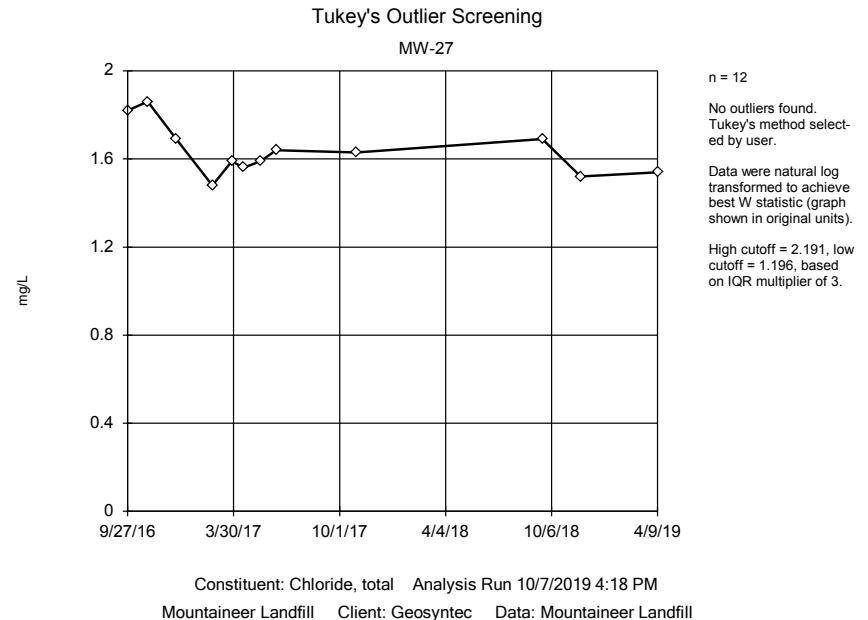
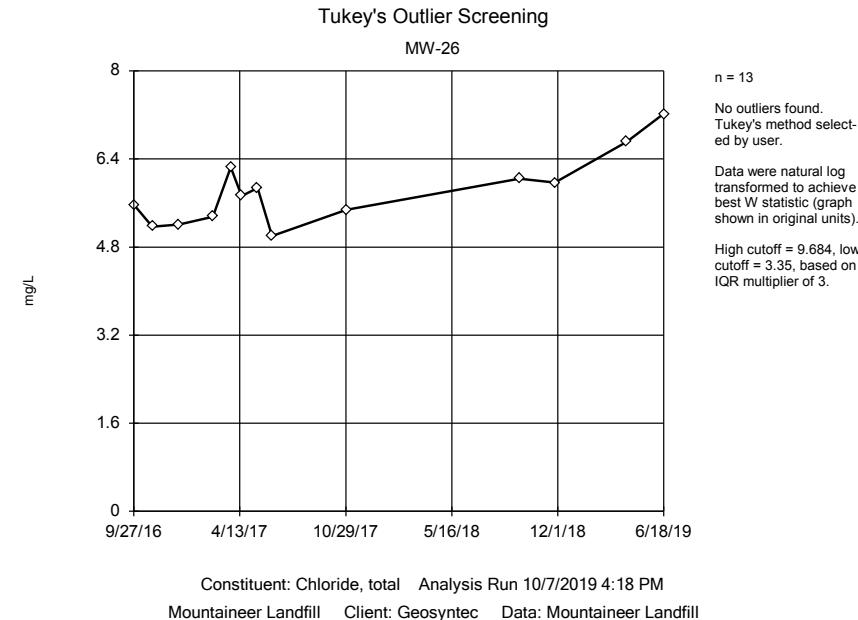
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

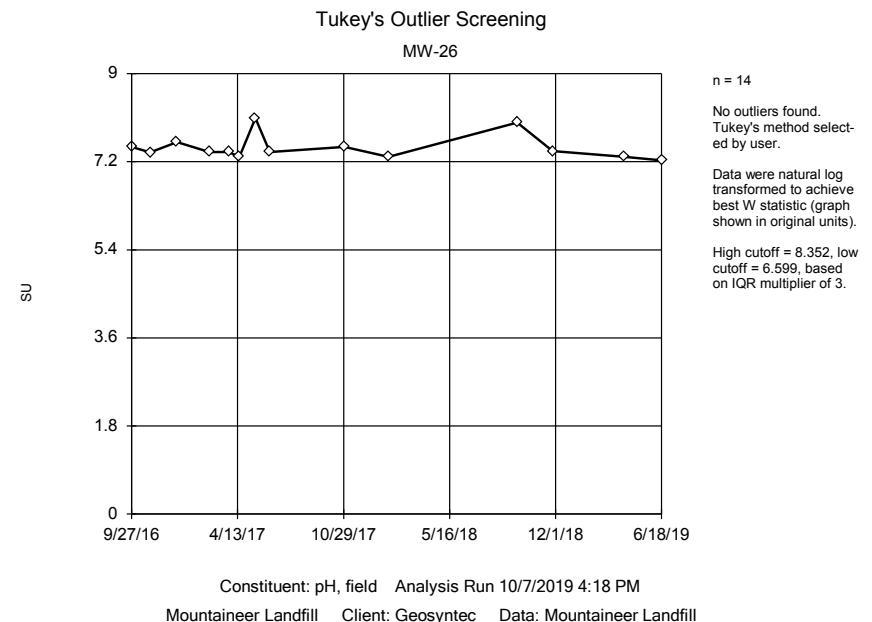
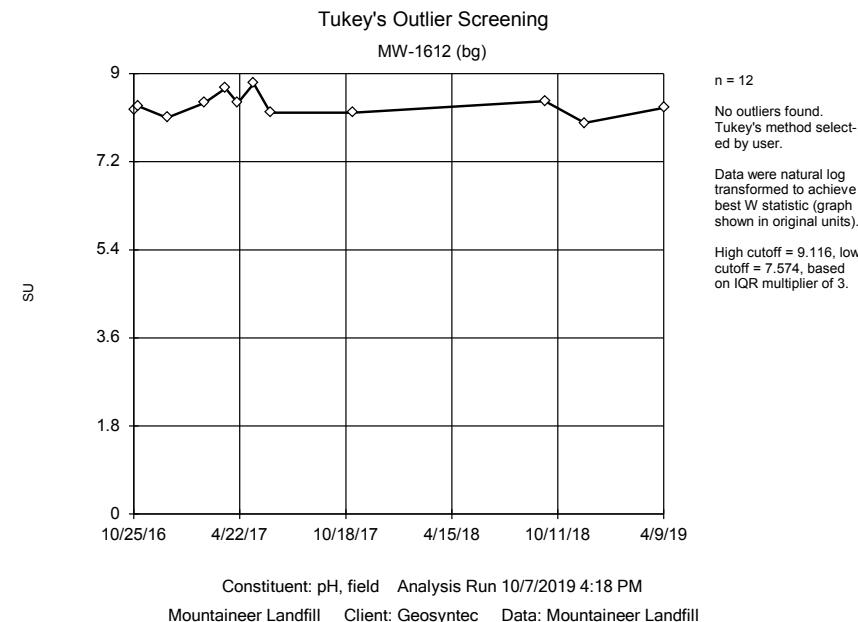
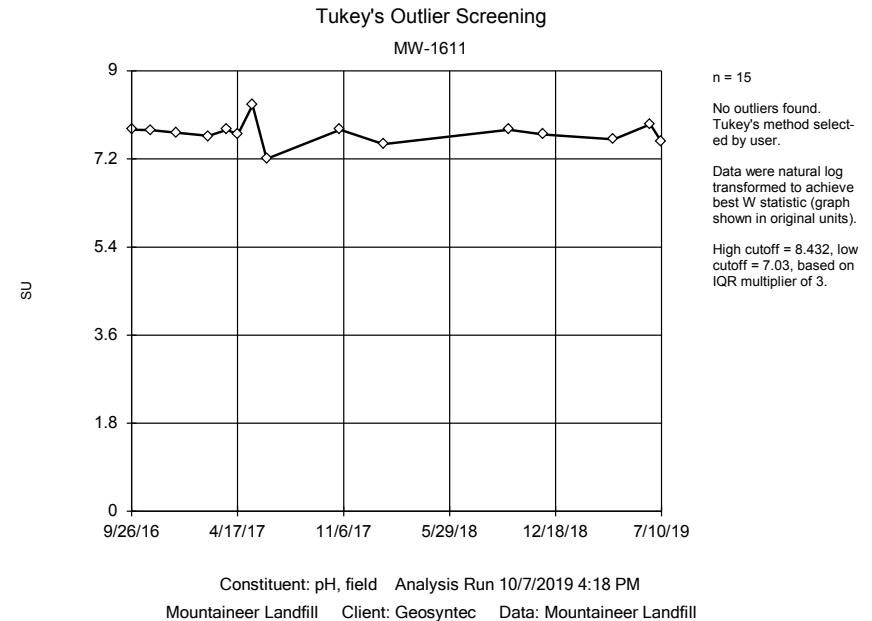
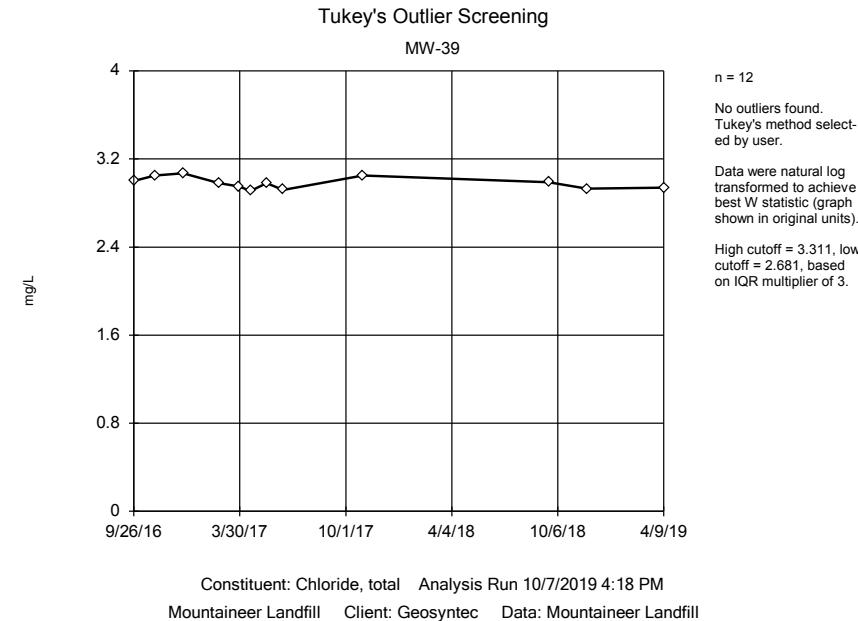


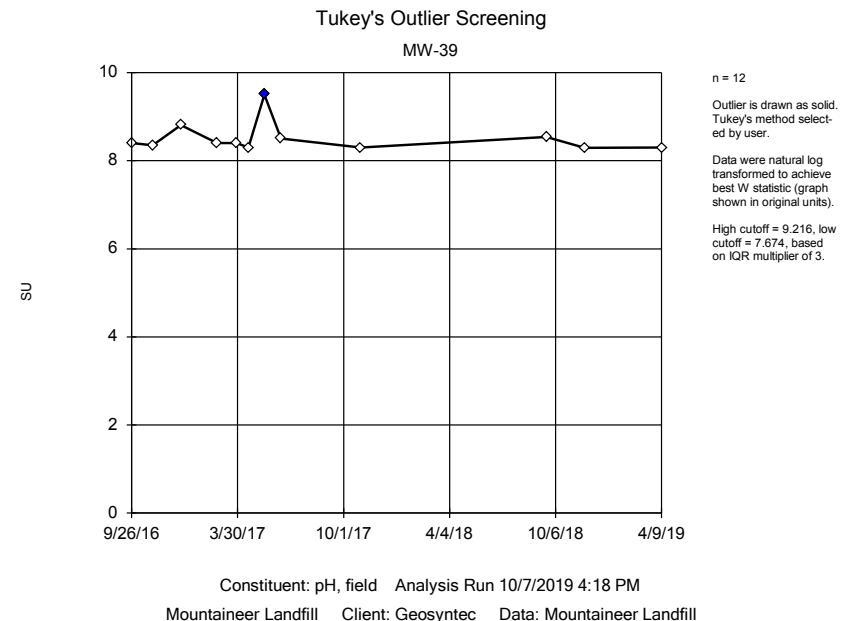
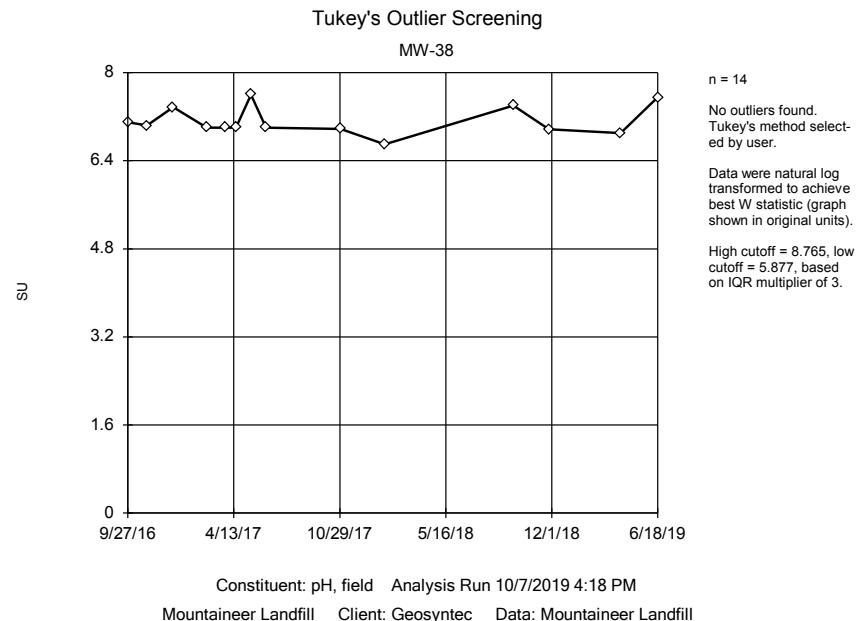
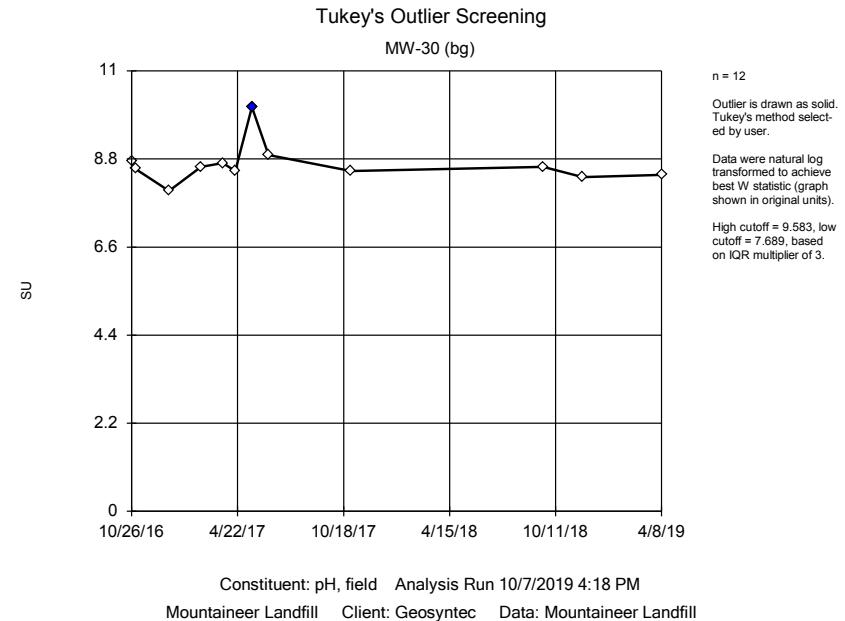
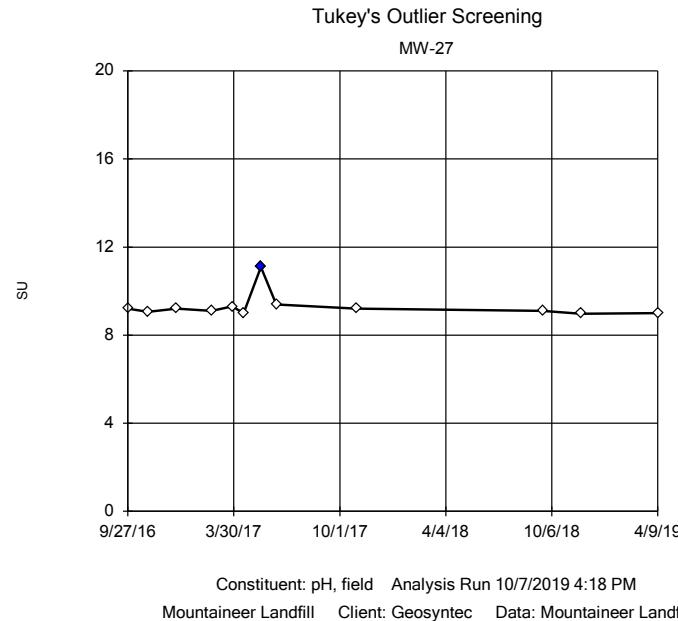


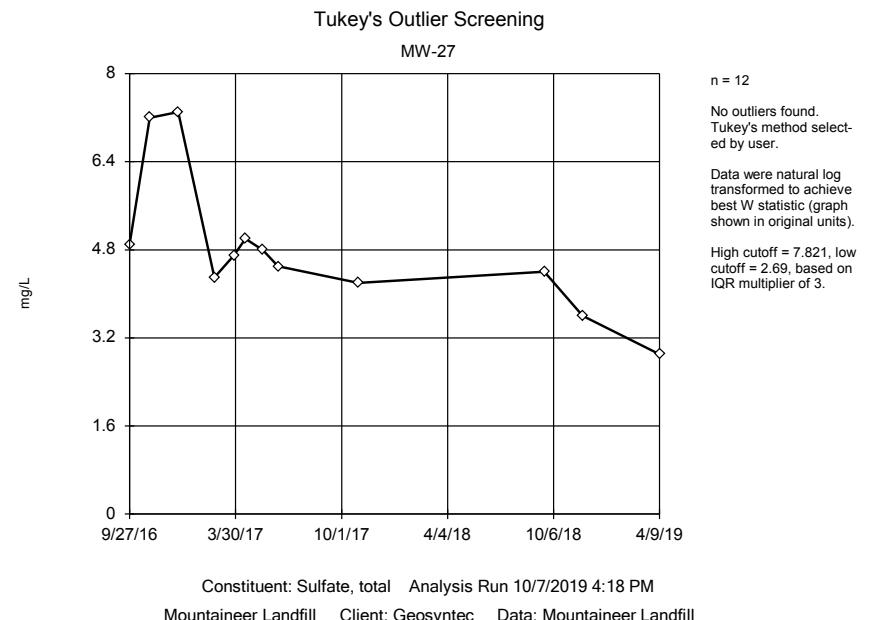
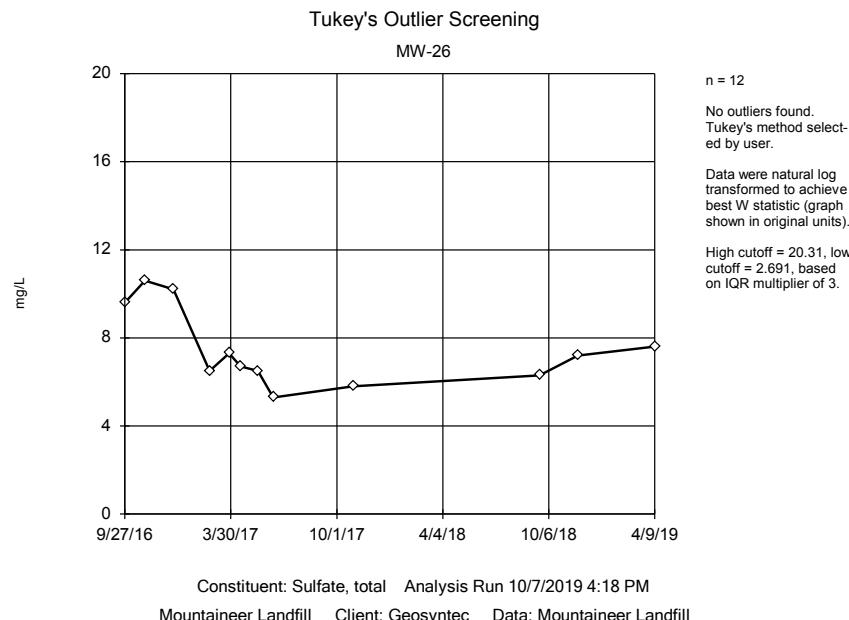
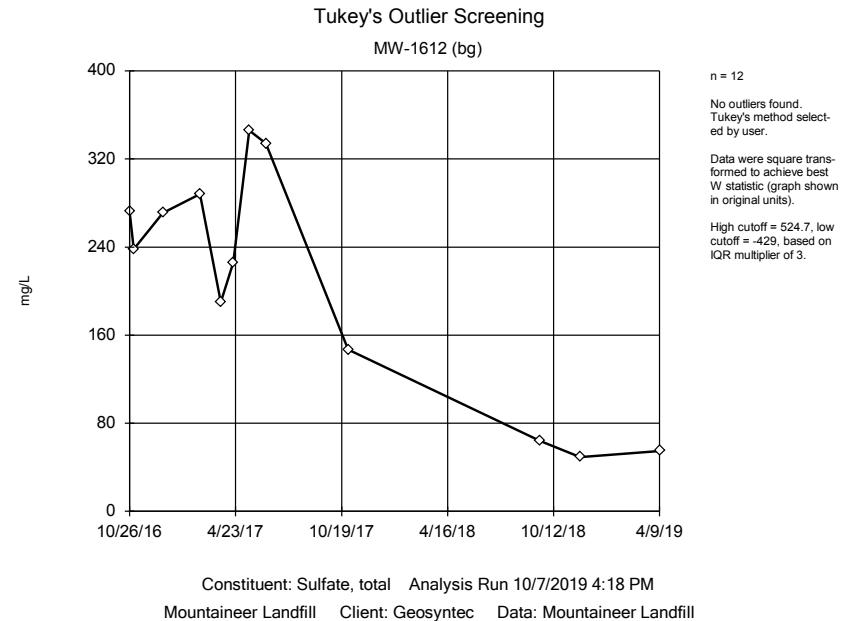
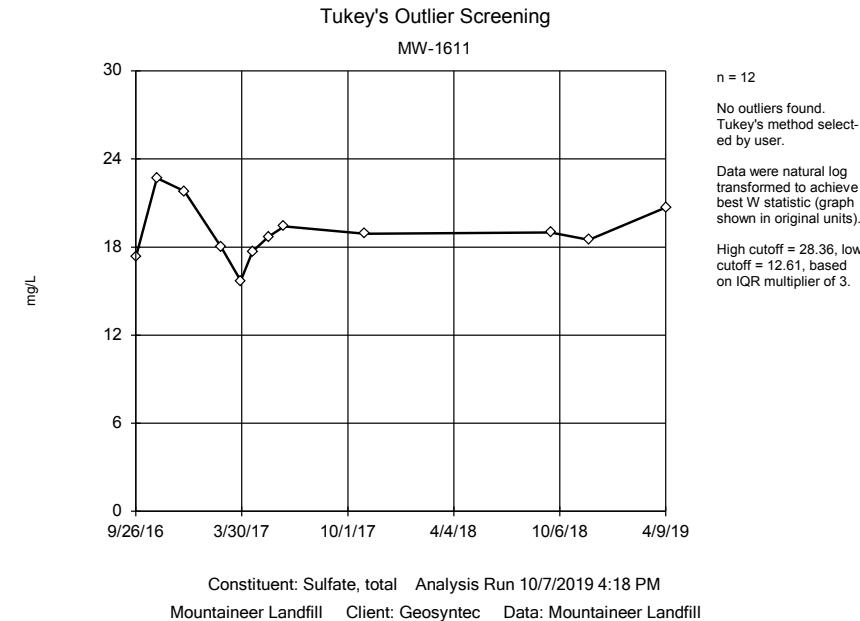


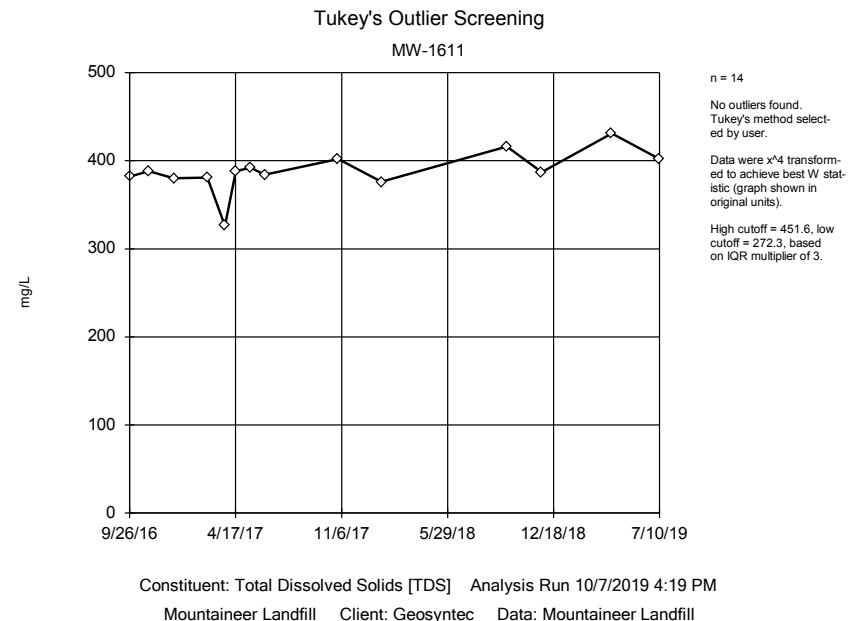
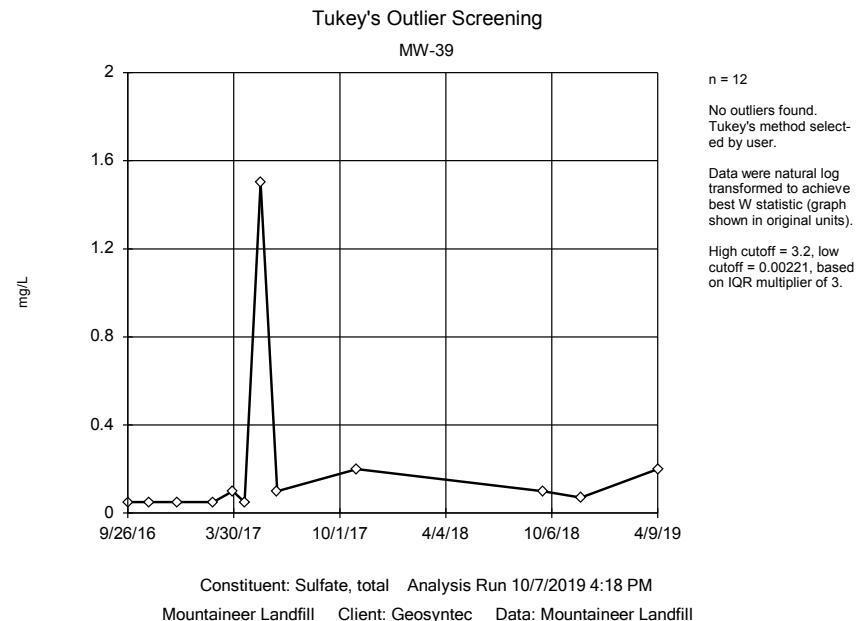
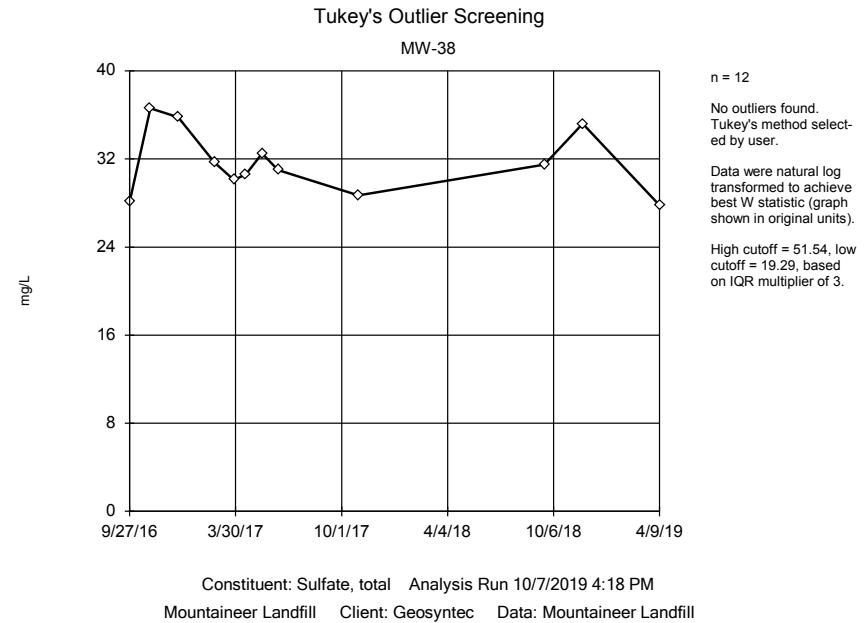
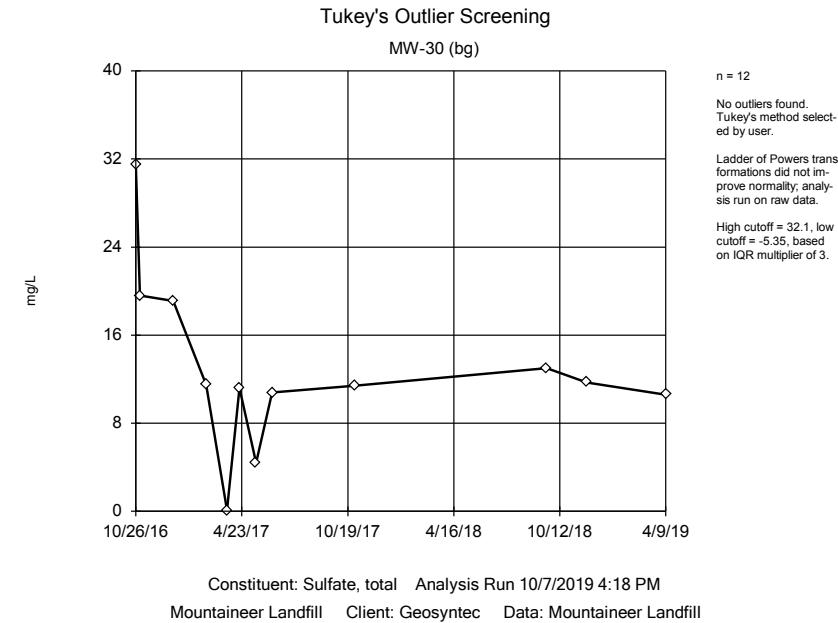


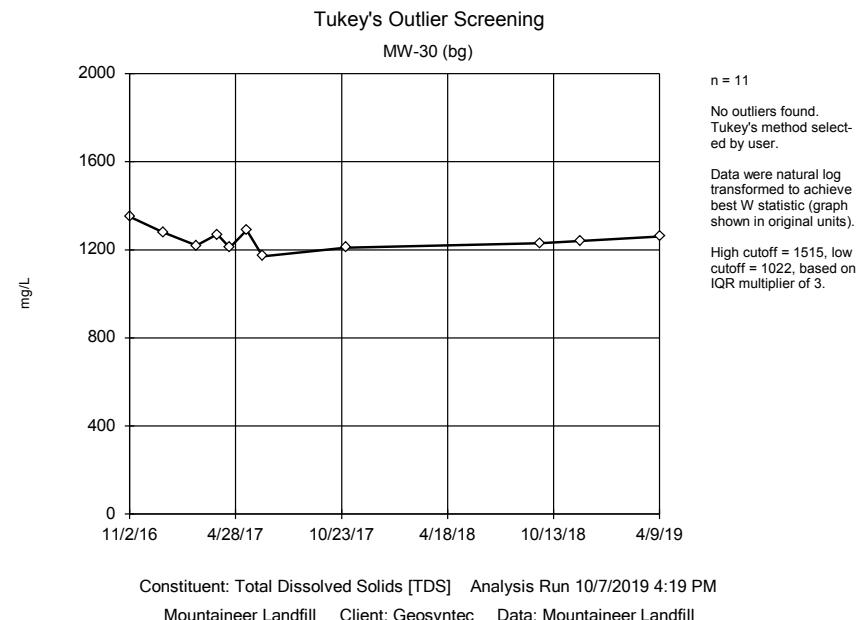
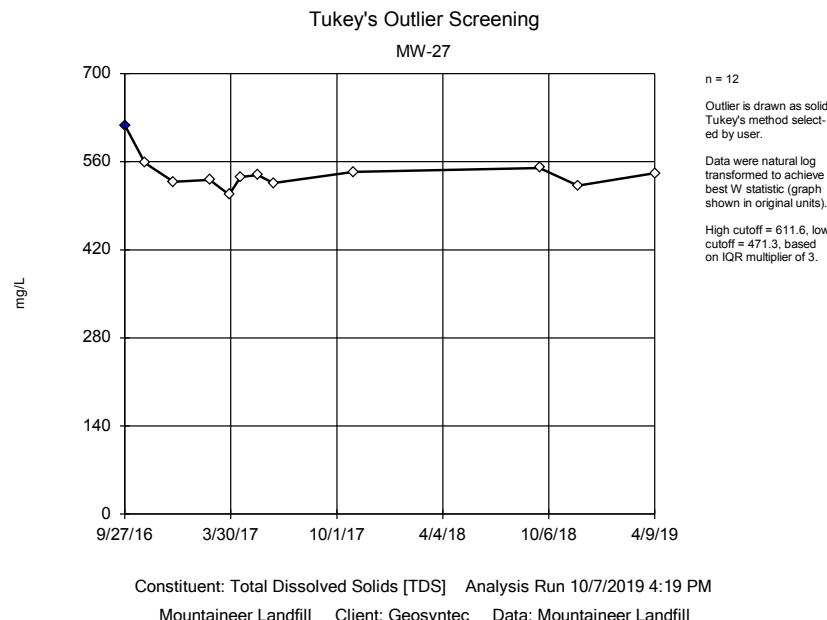
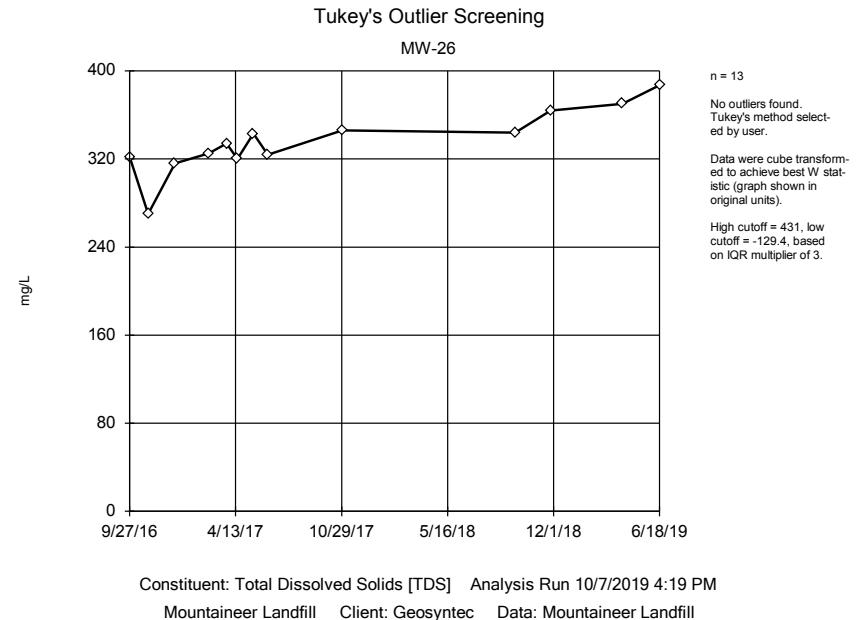
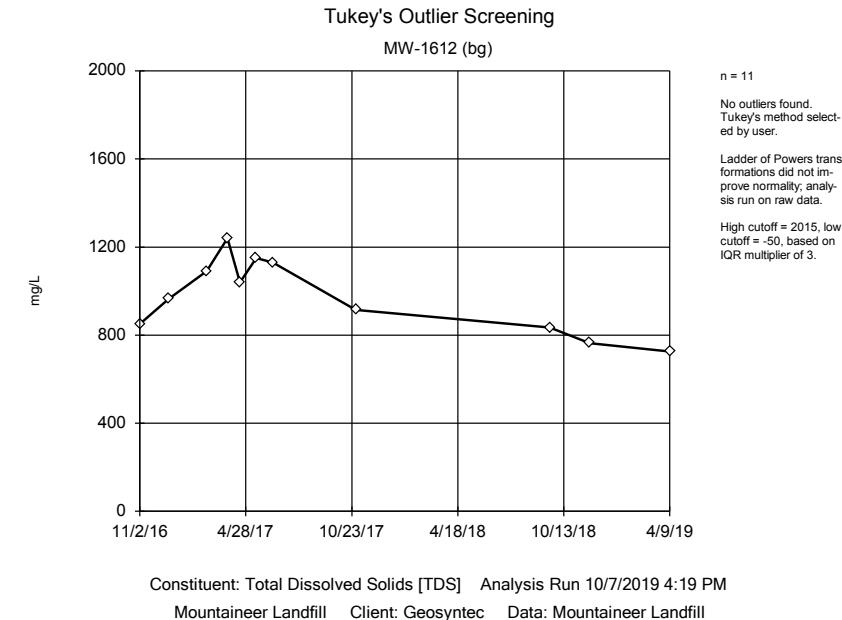












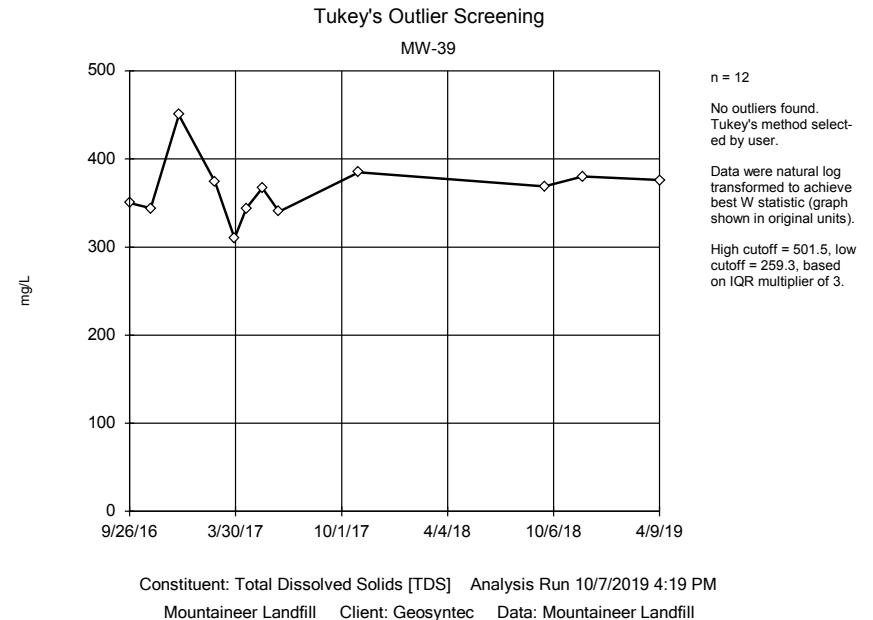
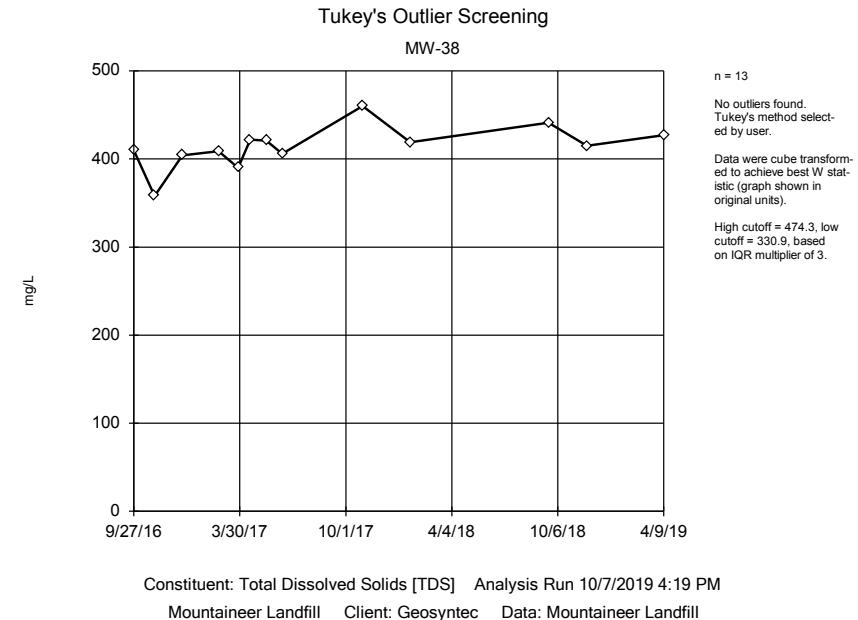


FIGURE D: MANN-WHITNEY ANALYSIS

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

Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill Printed 10/15/2019, 2:40 PM

| <u>Constituent</u> | <u>Well</u> | <u>Calc.</u> | <u>0.01</u> | <u>Method</u> |
|-------------------------------------|-------------|--------------|-------------|---------------|
| Total Dissolved Solids [TDS] (mg/L) | MW-26 | 2.855 | Yes | Mann-W |

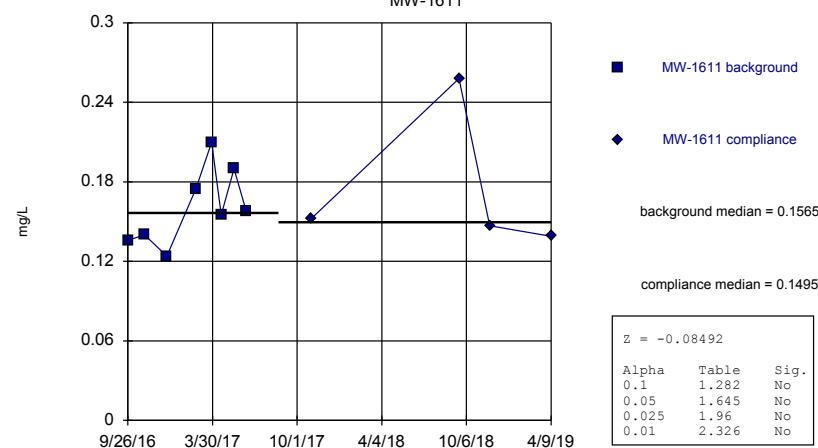
Welch's t-test/Mann-Whitney - All Results

Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill Printed 10/15/2019, 2:40 PM

| <u>Constituent</u> | <u>Well</u> | <u>Calc.</u> | <u>0.01</u> | <u>Method</u> |
|--|--------------|--------------|-------------|---------------|
| Boron, total (mg/L) | MW-1611 | -0.08492 | No | Mann-W |
| Boron, total (mg/L) | MW-1612 (bg) | -2.293 | No | Mann-W |
| Boron, total (mg/L) | MW-26 | 1.274 | No | Mann-W |
| Boron, total (mg/L) | MW-27 | 0.4246 | No | Mann-W |
| Boron, total (mg/L) | MW-30 (bg) | 1.875 | No | Mann-W |
| Boron, total (mg/L) | MW-38 | 1.361 | No | Mann-W |
| Boron, total (mg/L) | MW-39 | 1.446 | No | Mann-W |
| Calcium, total (mg/L) | MW-1611 | 0.8429 | No | Mann-W |
| Calcium, total (mg/L) | MW-1612 (bg) | -2.633 | No | Mann-W |
| Calcium, total (mg/L) | MW-26 | -0.07319 | No | Mann-W |
| Calcium, total (mg/L) | MW-27 | -2.551 | No | Mann-W |
| Calcium, total (mg/L) | MW-30 (bg) | -0.2548 | No | Mann-W |
| Calcium, total (mg/L) | MW-38 | 0.7329 | No | Mann-W |
| Calcium, total (mg/L) | MW-39 | -0.9341 | No | Mann-W |
| Chloride, total (mg/L) | MW-1611 | 1.683 | No | Mann-W |
| Chloride, total (mg/L) | MW-1612 (bg) | -2.802 | No | Mann-W |
| Chloride, total (mg/L) | MW-26 | 1.976 | No | Mann-W |
| Chloride, total (mg/L) | MW-27 | -0.8522 | No | Mann-W |
| Chloride, total (mg/L) | MW-30 (bg) | 0.1717 | No | Mann-W |
| Chloride, total (mg/L) | MW-38 | 1.104 | No | Mann-W |
| Chloride, total (mg/L) | MW-39 | -0.1704 | No | Mann-W |
| pH, field (SU) | MW-1611 | -0.4675 | No | Mann-W |
| pH, field (SU) | MW-1612 (bg) | -1.023 | No | Mann-W |
| pH, field (SU) | MW-26 | -0.7824 | No | Mann-W |
| pH, field (SU) | MW-27 | -1.631 | No | Mann-W |
| pH, field (SU) | MW-30 (bg) | -1.619 | No | Mann-W |
| pH, field (SU) | MW-38 | -1.371 | No | Mann-W |
| pH, field (SU) | MW-39 | -1.637 | No | Mann-W |
| Sulfate, total (mg/L) | MW-1611 | 0.5944 | No | Mann-W |
| Sulfate, total (mg/L) | MW-1612 (bg) | -2.802 | No | Mann-W |
| Sulfate, total (mg/L) | MW-26 | -0.9358 | No | Mann-W |
| Sulfate, total (mg/L) | MW-27 | -2.633 | No | Mann-W |
| Sulfate, total (mg/L) | MW-30 (bg) | -0.08492 | No | Mann-W |
| Sulfate, total (mg/L) | MW-38 | -0.9341 | No | Mann-W |
| Sulfate, total (mg/L) | MW-39 | -1.458 | No | Mann-W |
| Total Dissolved Solids [TDS] (mg/L) | MW-1611 | 1.747 | No | Mann-W |
| Total Dissolved Solids [TDS] (mg/L) | MW-1612 (bg) | -2.551 | No | Mann-W |
| Total Dissolved Solids [TDS] (mg/L) | MW-26 | 2.855 | Yes | Mann-W |
| Total Dissolved Solids [TDS] (mg/L) | MW-27 | 0.4246 | No | Mann-W |
| Total Dissolved Solids [TDS] (mg/L) | MW-30 (bg) | -0.7577 | No | Mann-W |
| Total Dissolved Solids [TDS] (mg/L) | MW-38 | 2.269 | No | Mann-W |
| Total Dissolved Solids [TDS] (mg/L) | MW-39 | 1.786 | No | Mann-W |

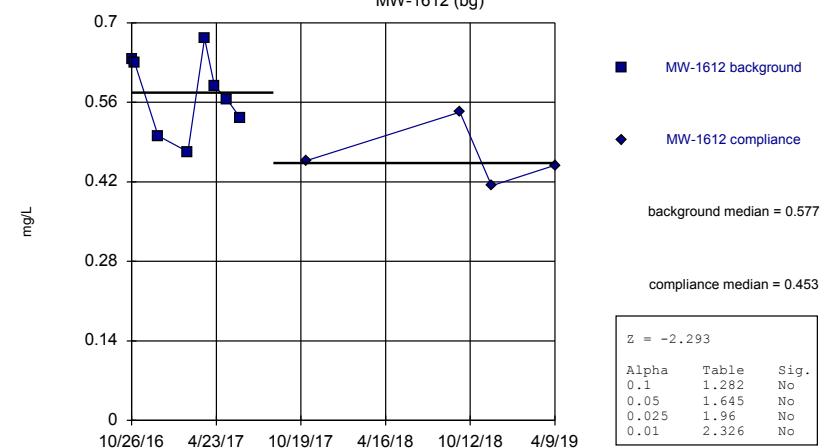
Mann-Whitney (Wilcoxon Rank Sum)

MW-1611



Mann-Whitney (Wilcoxon Rank Sum)

MW-1612 (bg)

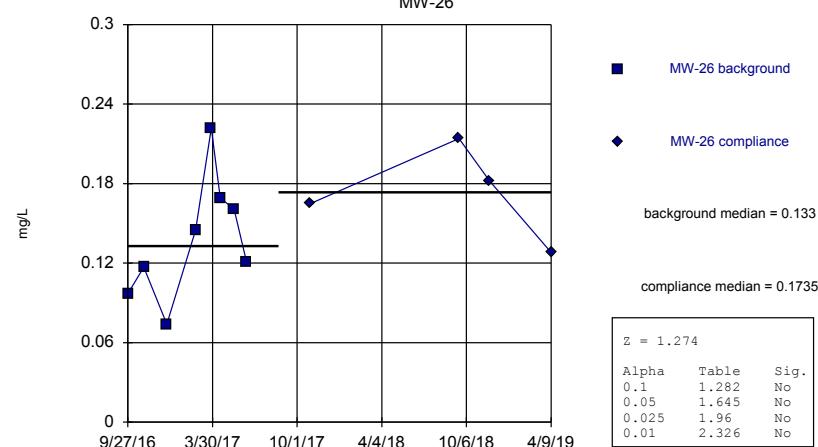


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Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

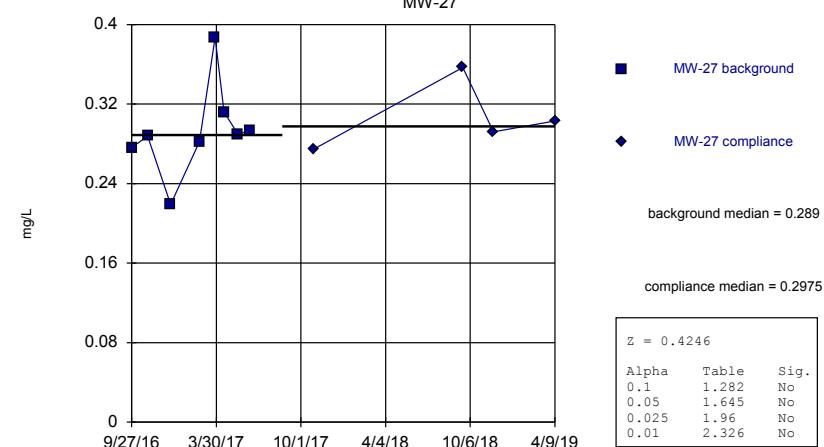
Mann-Whitney (Wilcoxon Rank Sum)

MW-26



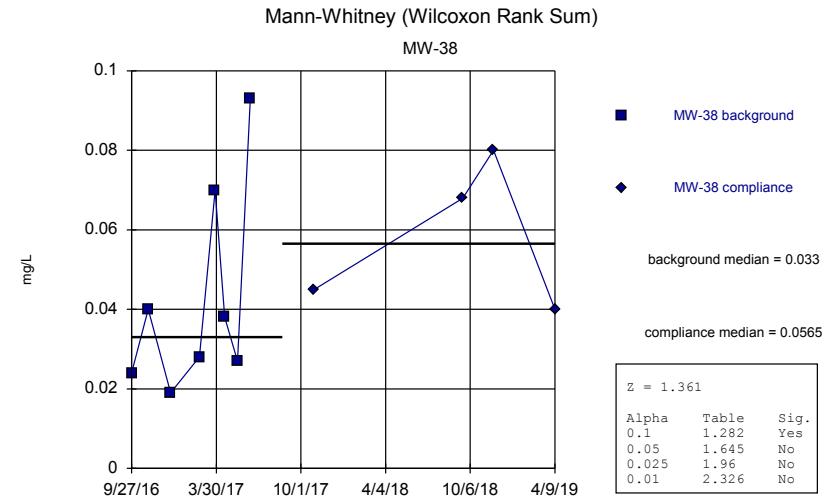
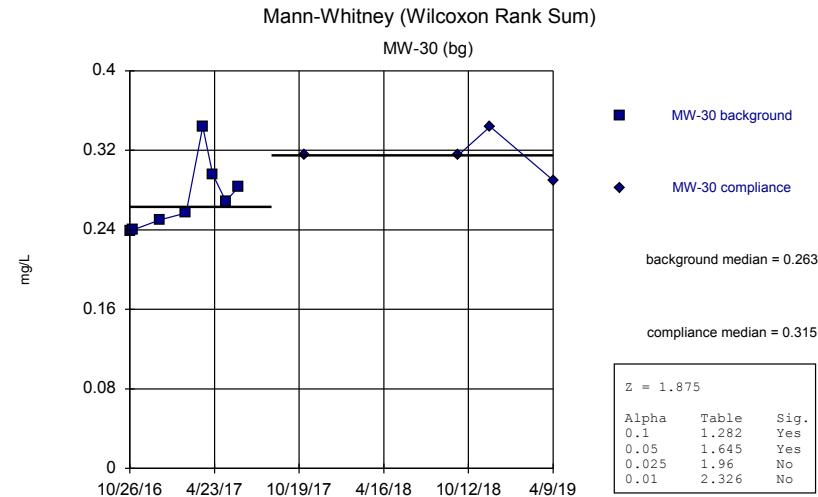
Mann-Whitney (Wilcoxon Rank Sum)

MW-27



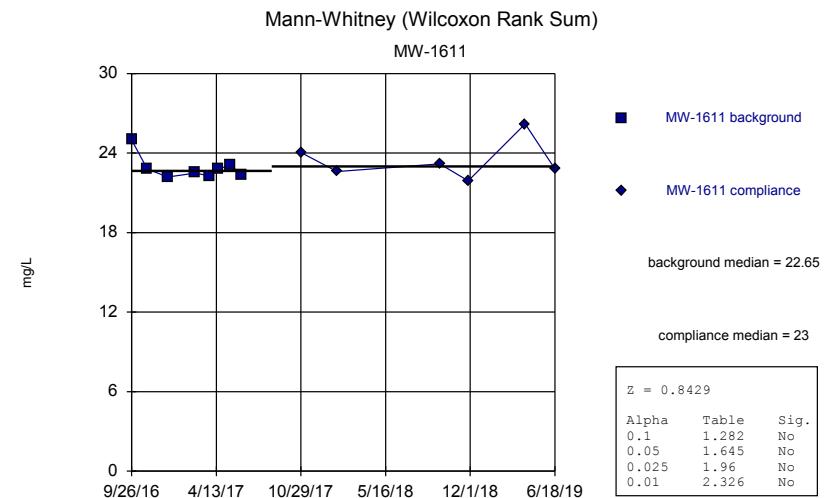
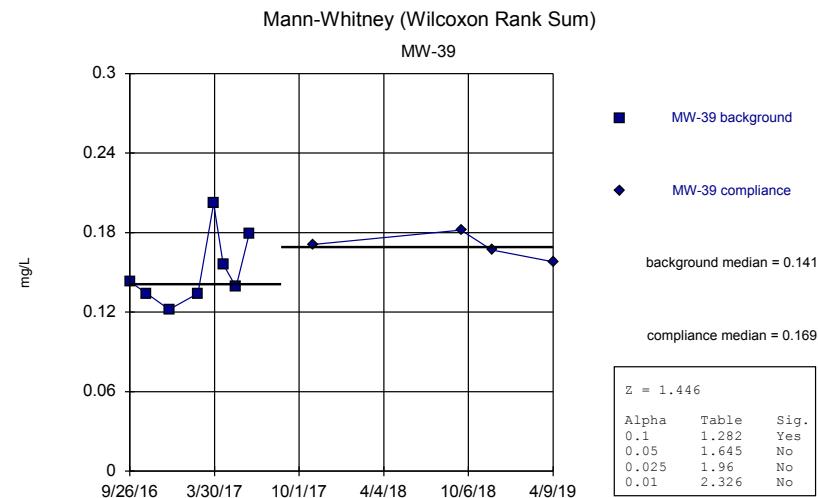
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Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



Constituent: Boron, total Analysis Run 10/15/2019 2:38 PM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

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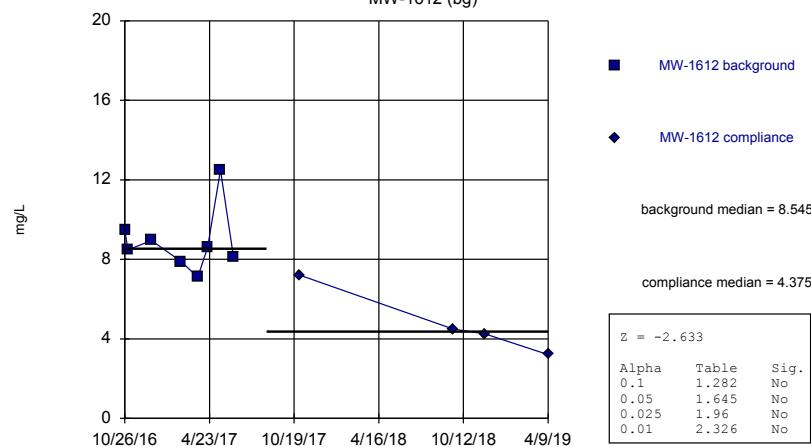


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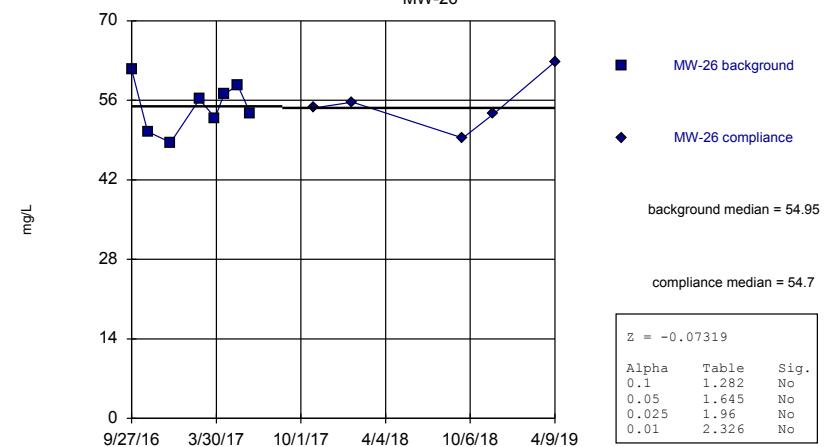
Mann-Whitney (Wilcoxon Rank Sum)

MW-1612 (bg)



Mann-Whitney (Wilcoxon Rank Sum)

MW-26

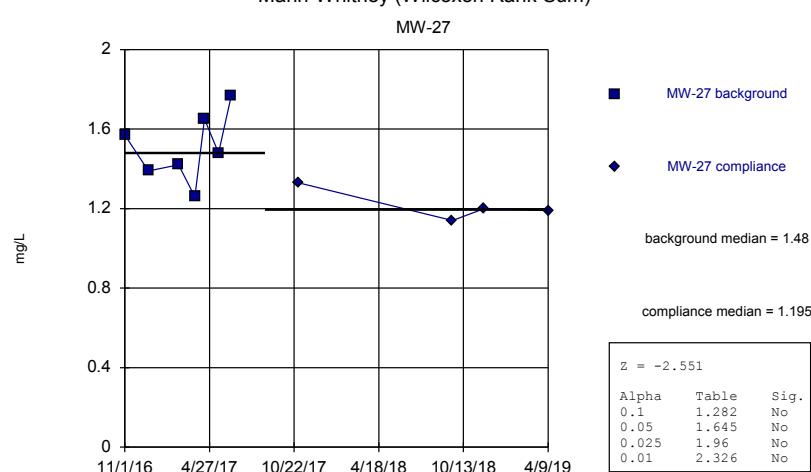


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Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

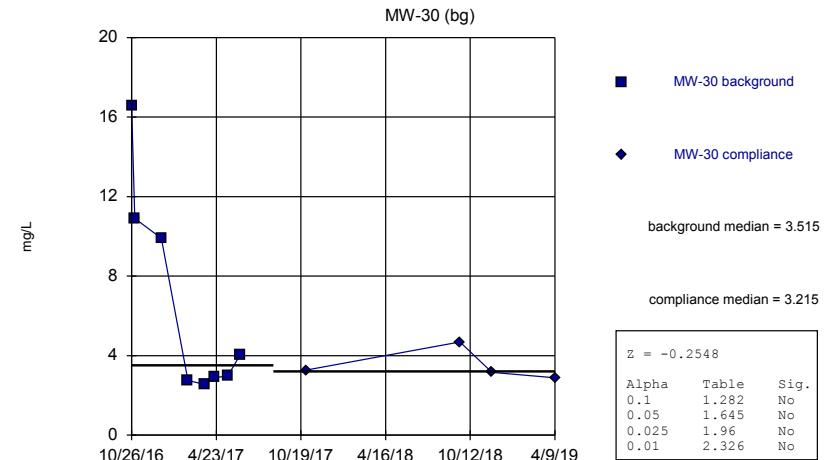
Mann-Whitney (Wilcoxon Rank Sum)

MW-27



Mann-Whitney (Wilcoxon Rank Sum)

MW-30 (bg)

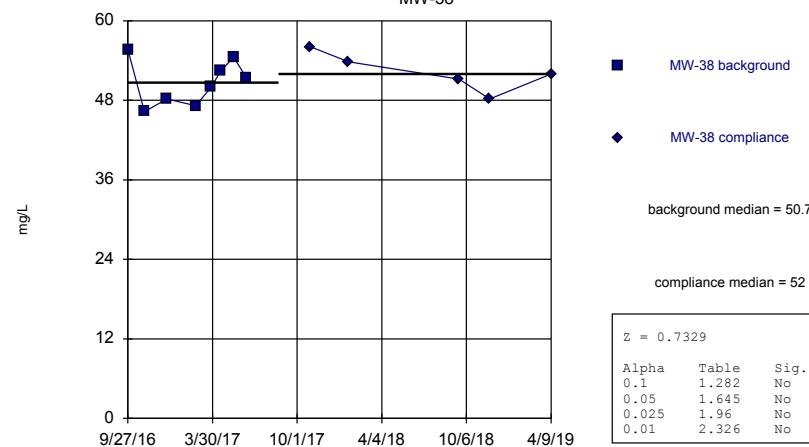


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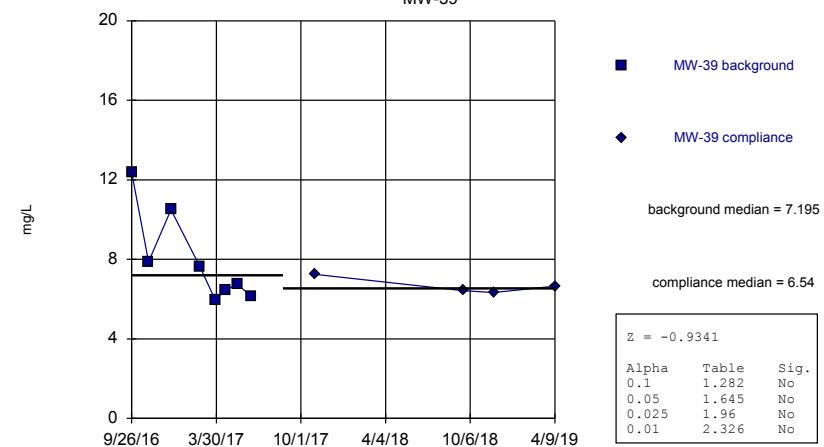
Mann-Whitney (Wilcoxon Rank Sum)

MW-38



Mann-Whitney (Wilcoxon Rank Sum)

MW-39

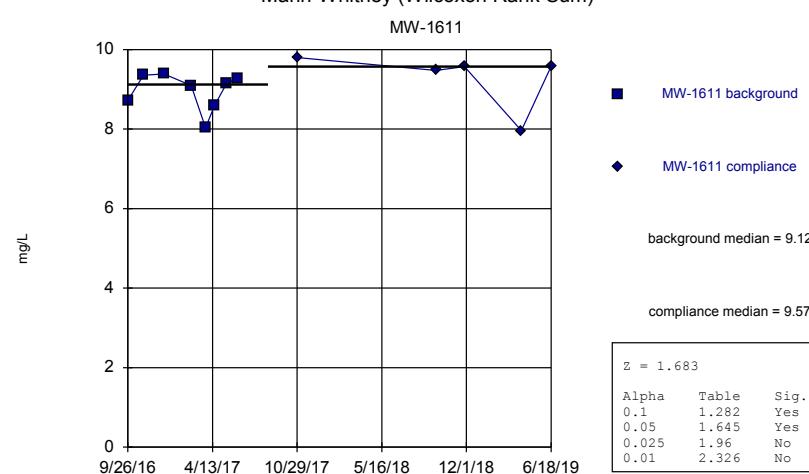


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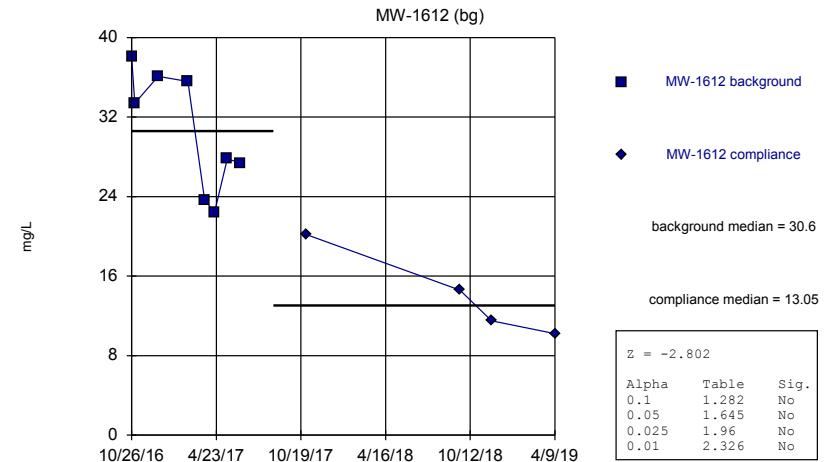
Mann-Whitney (Wilcoxon Rank Sum)

MW-1611



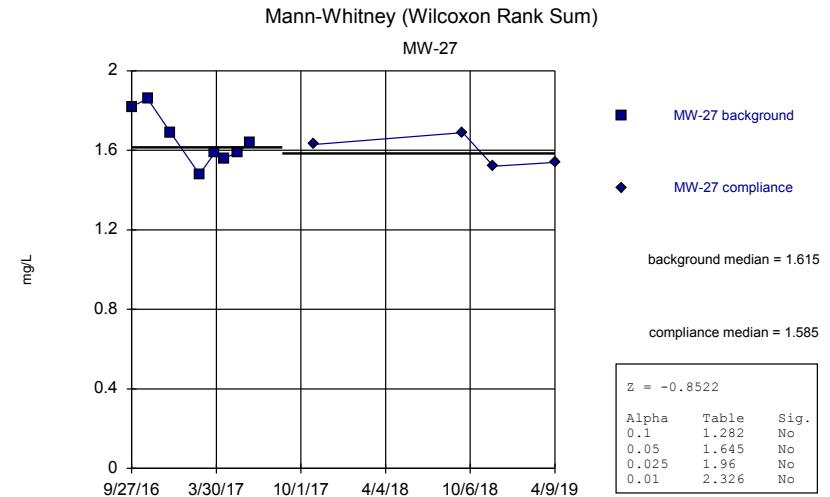
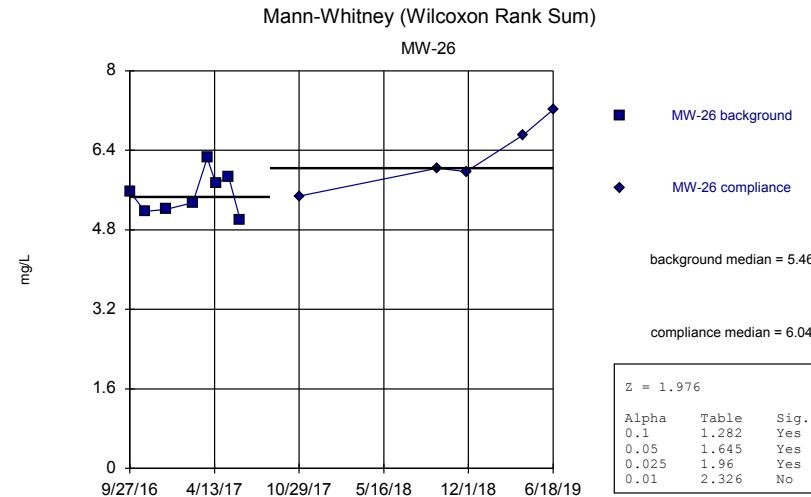
Mann-Whitney (Wilcoxon Rank Sum)

MW-1612 (bg)



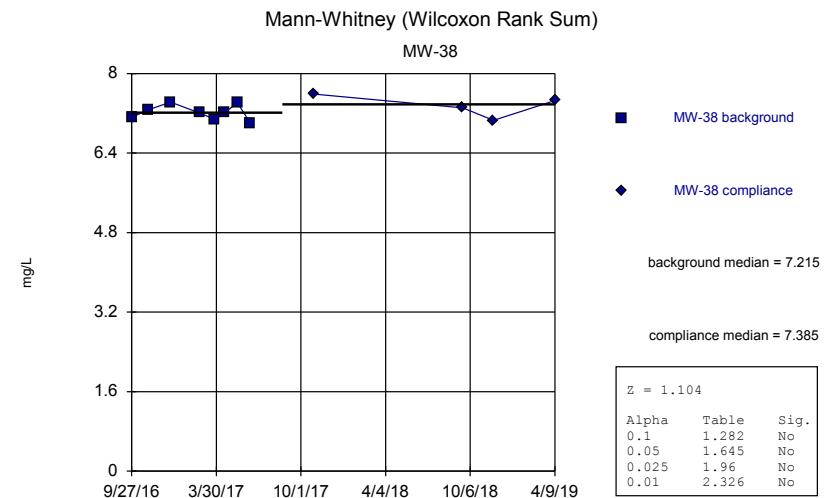
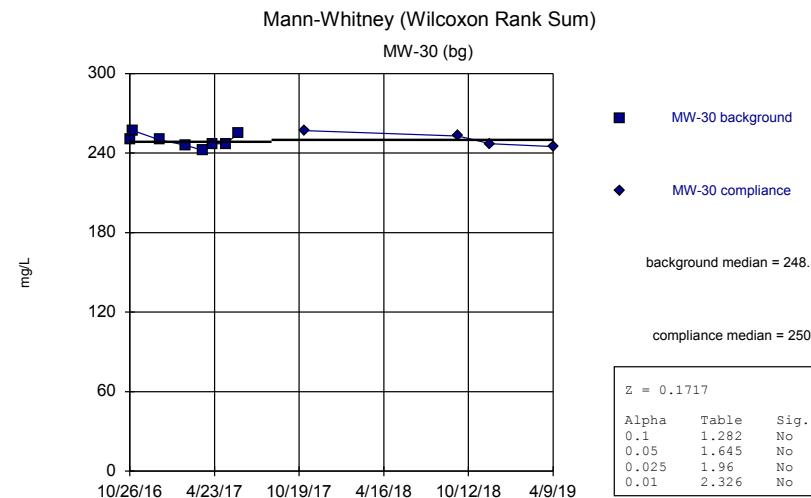
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 Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



Constituent: Chloride, total Analysis Run 10/15/2019 2:38 PM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

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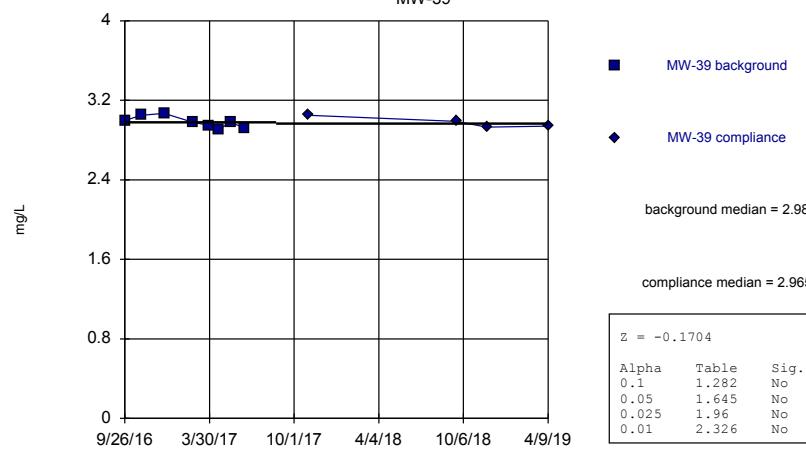


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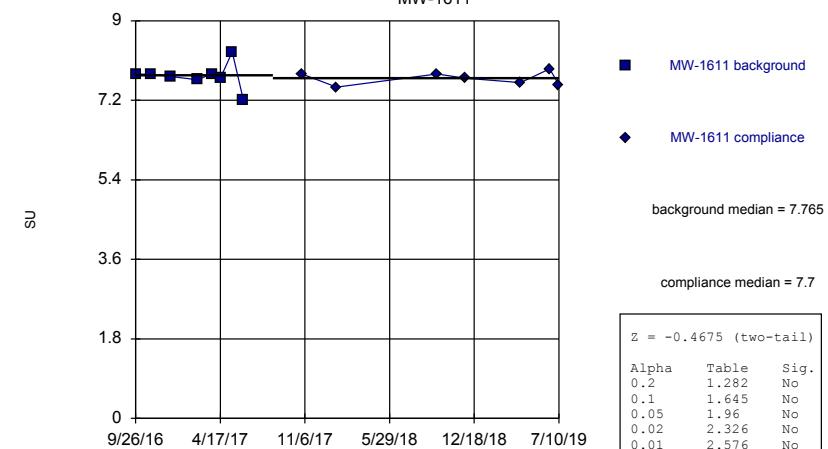
Mann-Whitney (Wilcoxon Rank Sum)

MW-39



Mann-Whitney (Wilcoxon Rank Sum)

MW-1611

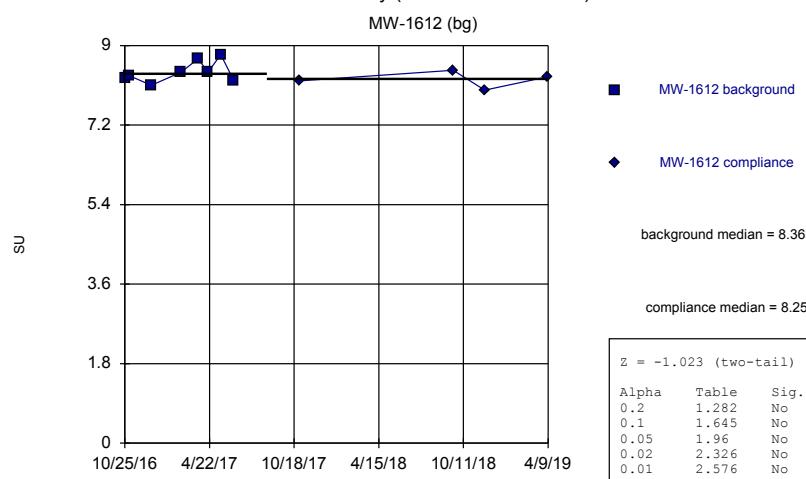


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Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Constituent: pH, field Analysis Run 10/15/2019 2:38 PM View: Intrawell
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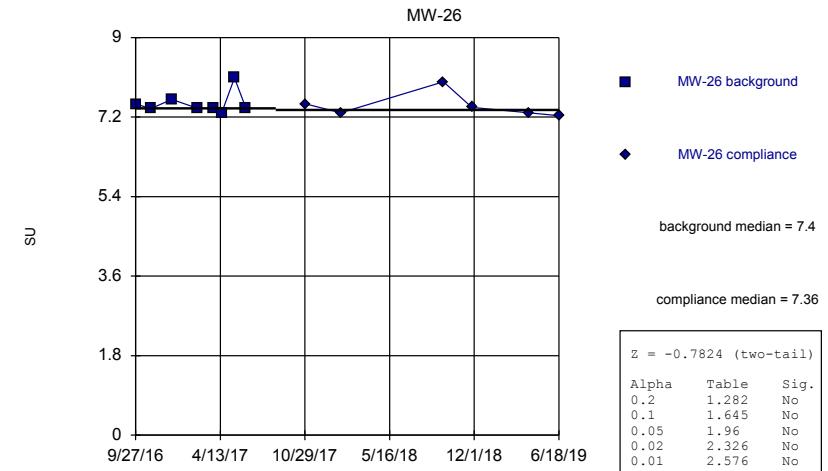
Mann-Whitney (Wilcoxon Rank Sum)

MW-1612 (bg)



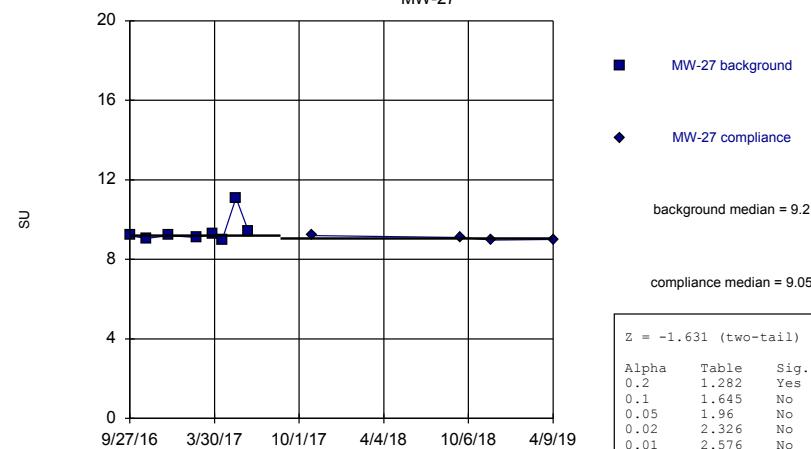
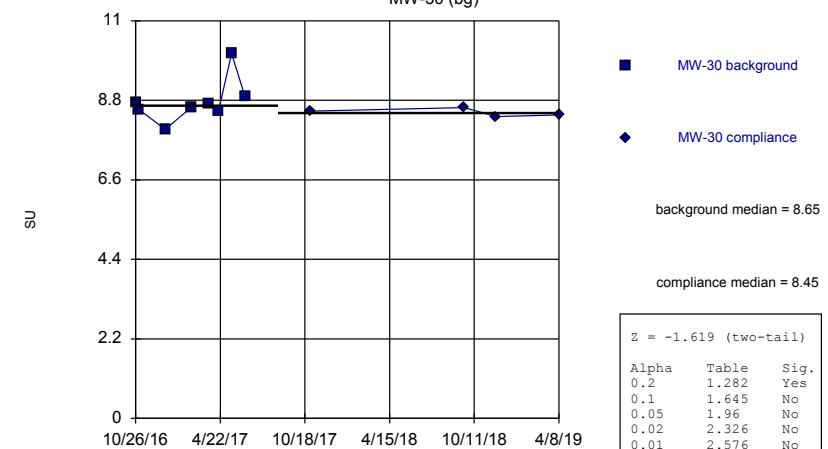
Mann-Whitney (Wilcoxon Rank Sum)

MW-26



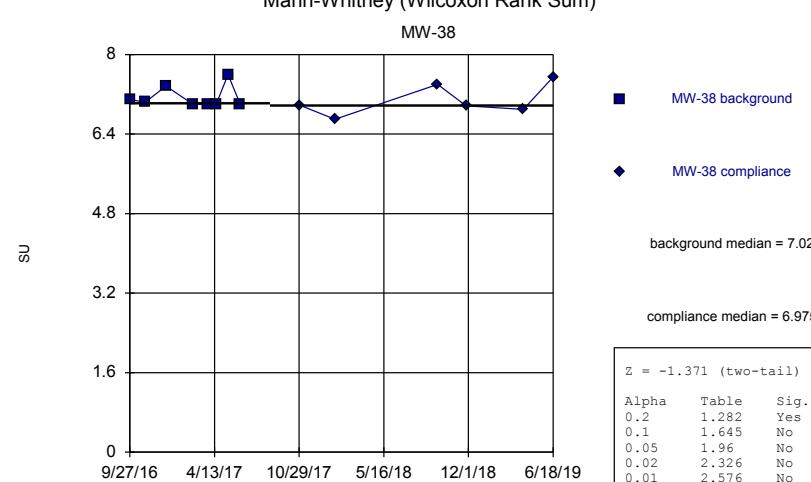
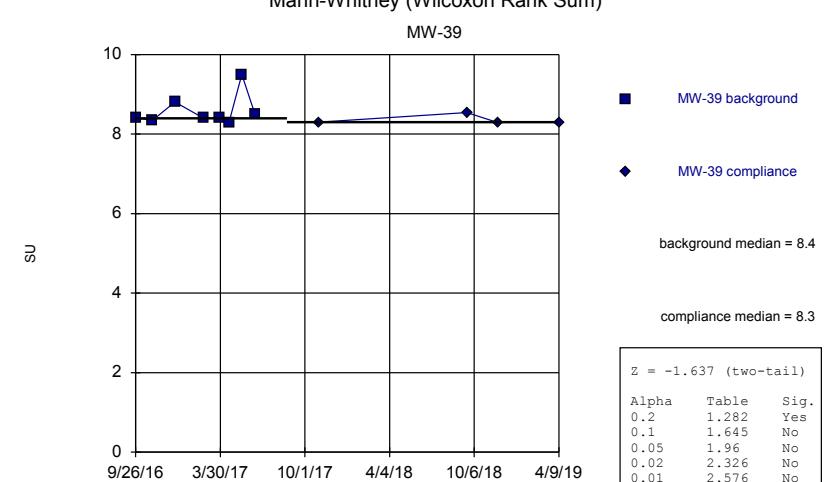
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Constituent: pH, field Analysis Run 10/15/2019 2:38 PM View: Intrawell
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Mann-Whitney (Wilcoxon Rank Sum)**MW-27****Mann-Whitney (Wilcoxon Rank Sum)****MW-30 (bg)**

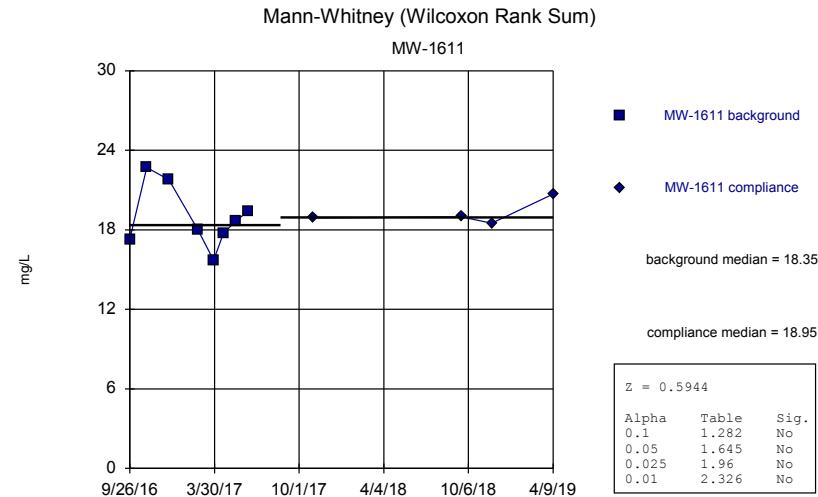
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Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Constituent: pH, field Analysis Run 10/15/2019 2:38 PM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

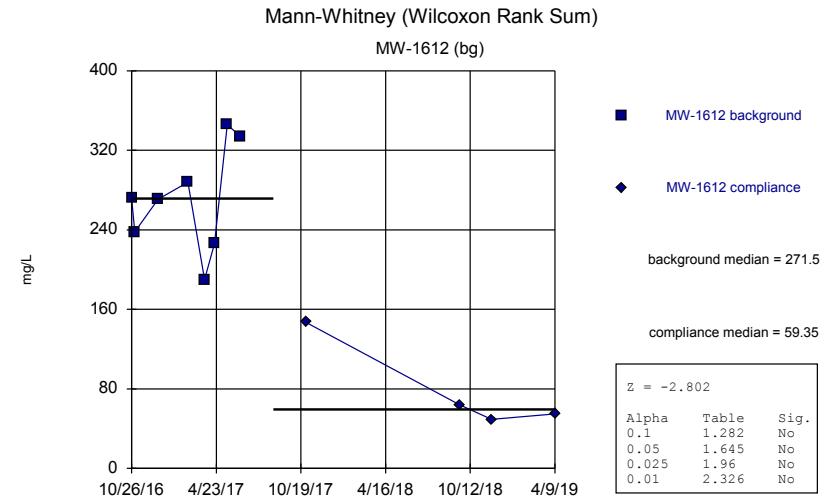
Mann-Whitney (Wilcoxon Rank Sum)**MW-38****Mann-Whitney (Wilcoxon Rank Sum)****MW-39**

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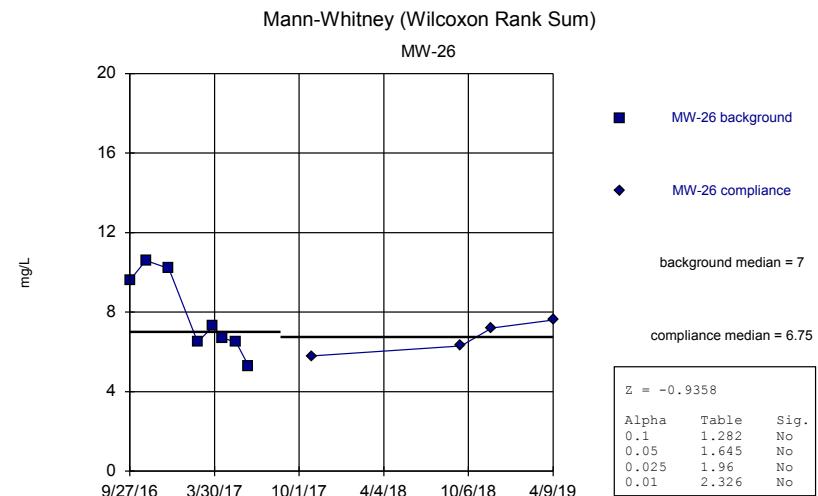
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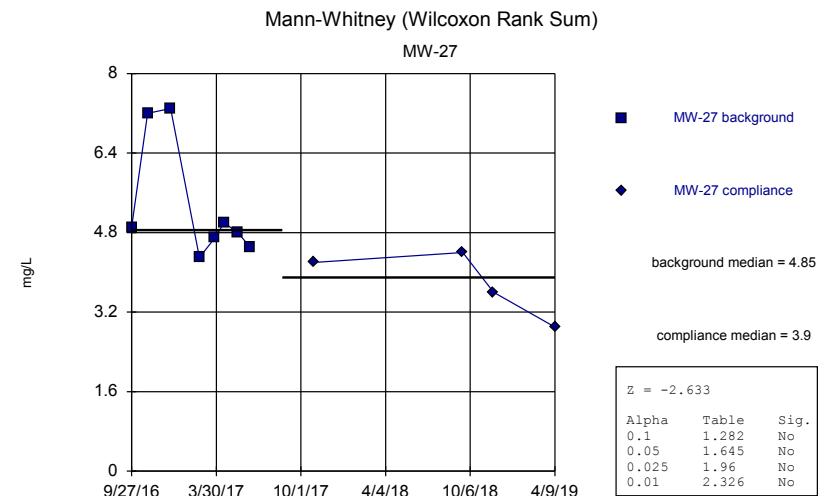
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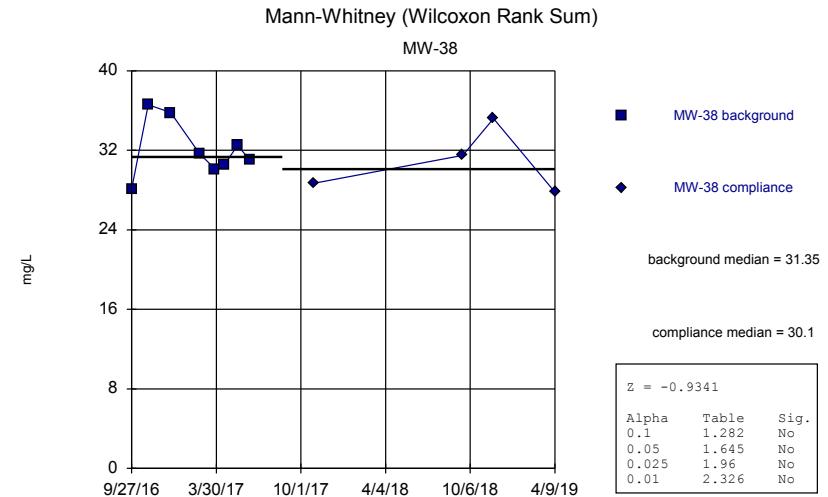
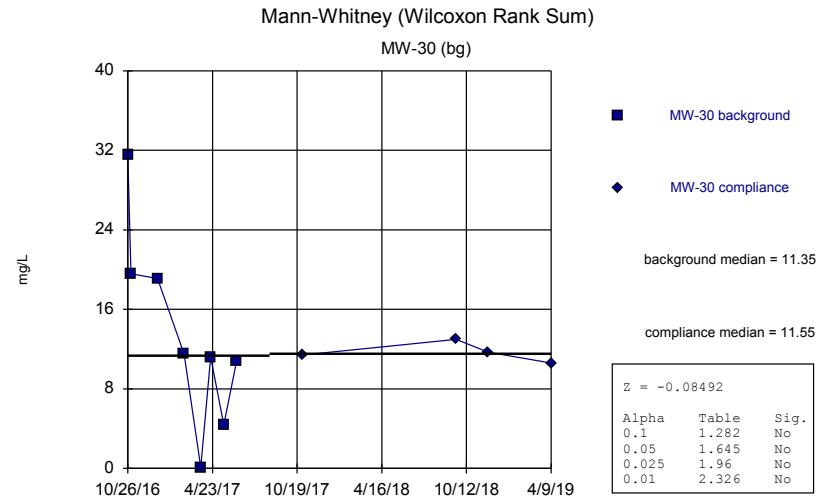
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Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



Constituent: Sulfate, total Analysis Run 10/15/2019 2:38 PM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

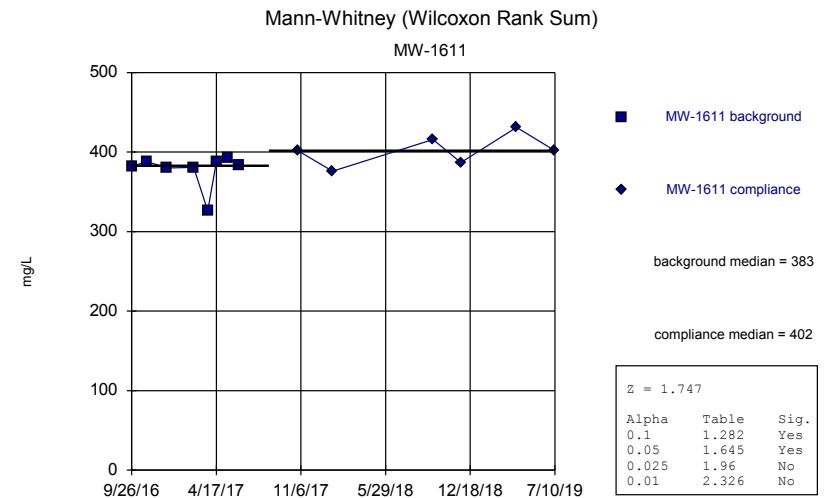
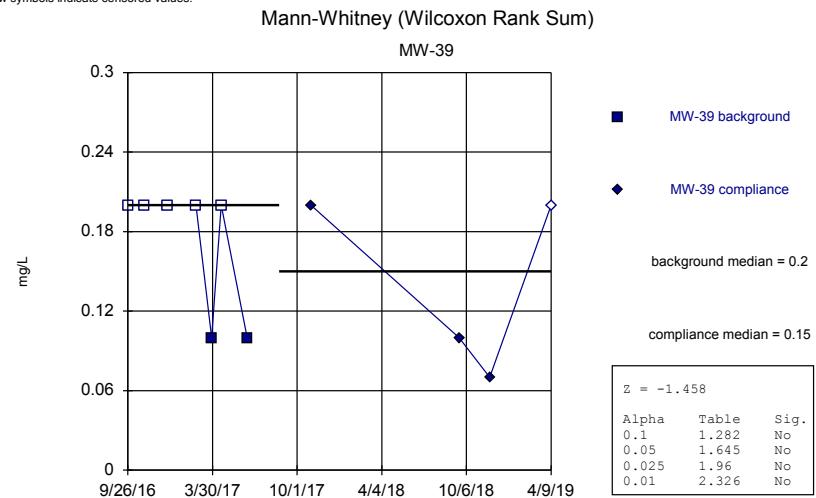


Constituent: Sulfate, total Analysis Run 10/15/2019 2:38 PM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



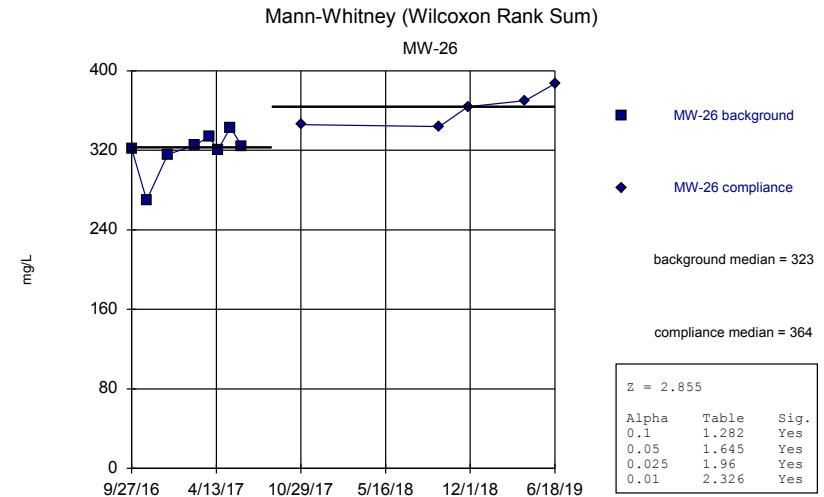
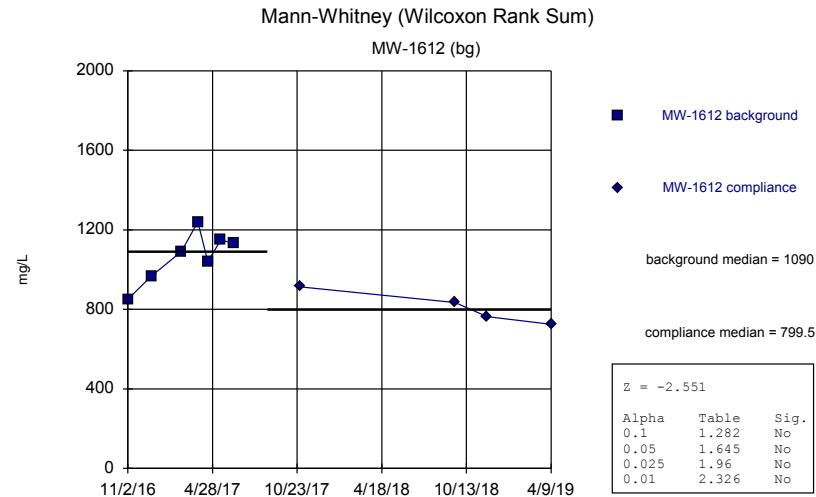
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Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

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Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



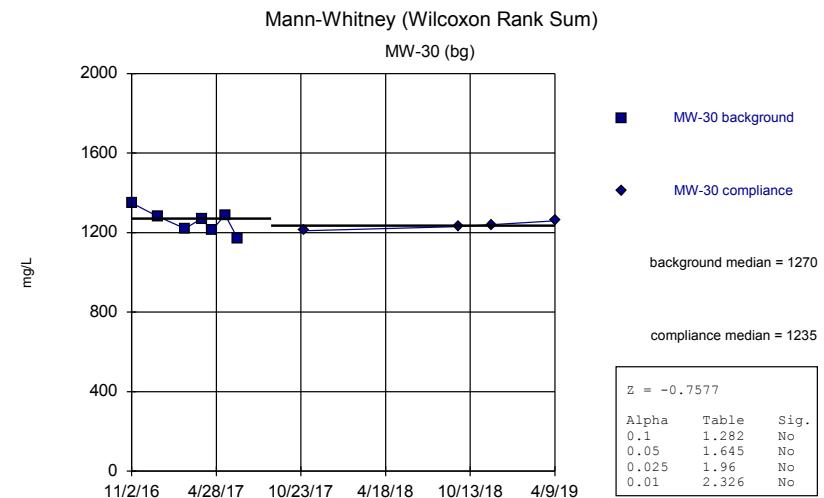
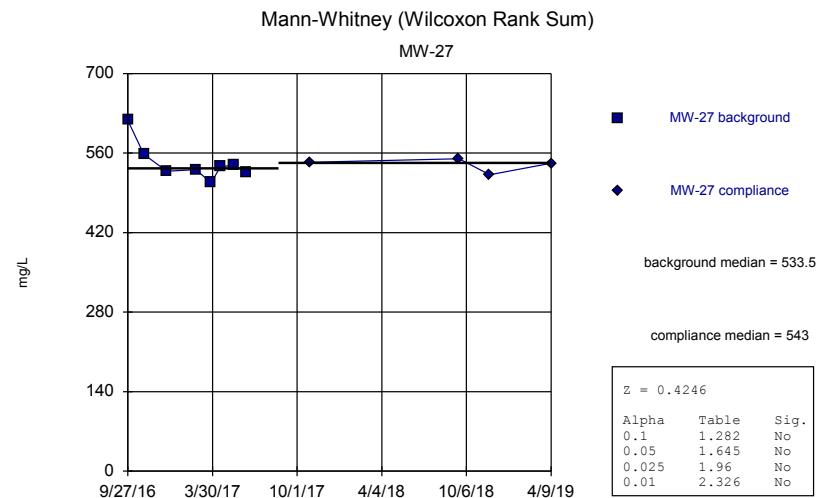
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Constituent: Total Dissolved Solids [TDS] Analysis Run 10/15/2019 2:38 PM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



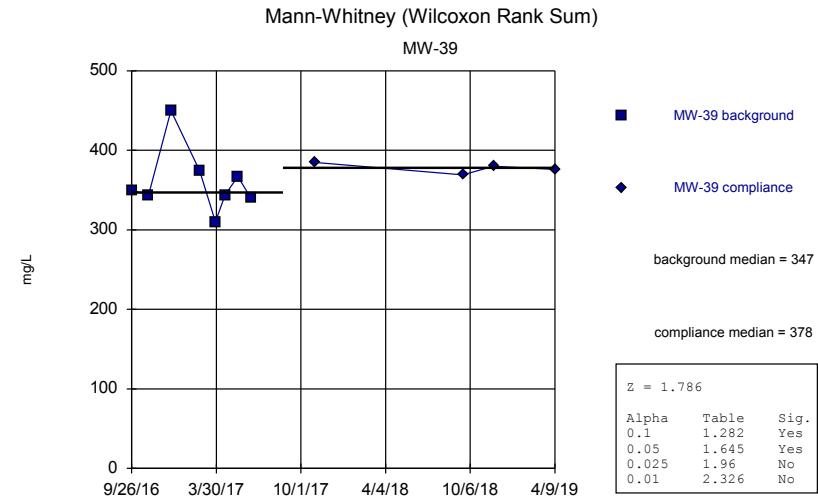
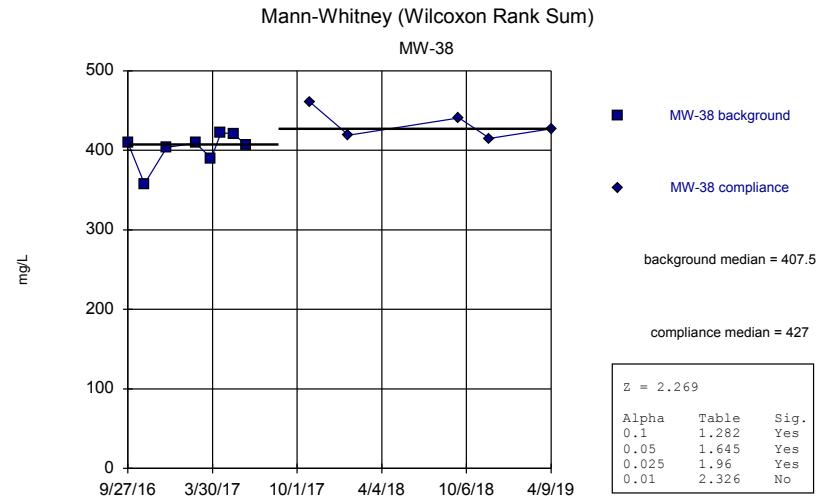
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Constituent: Total Dissolved Solids [TDS] Analysis Run 10/15/2019 2:38 PM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



Constituent: Total Dissolved Solids [TDS] Analysis Run 10/15/2019 2:38 PM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Constituent: Total Dissolved Solids [TDS] Analysis Run 10/15/2019 2:38 PM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



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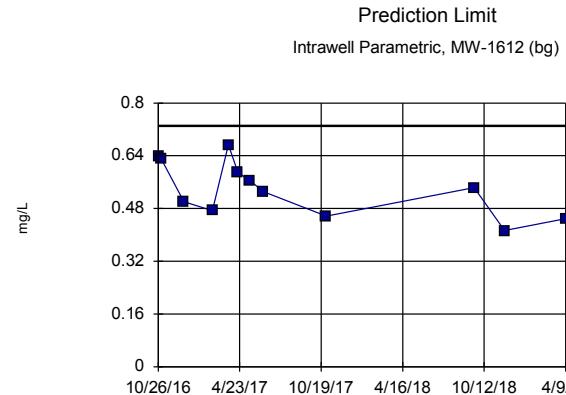
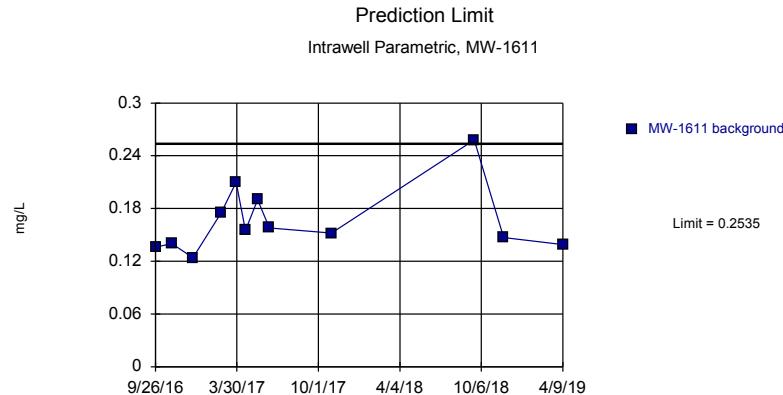
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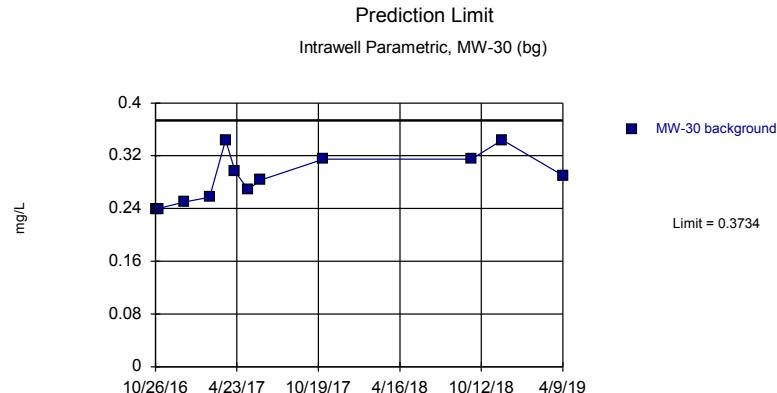
**FIGURE E: INTRAWELL PREDICTION
LIMITS**

Intrawell Prediction Limit Summary Table - All Results

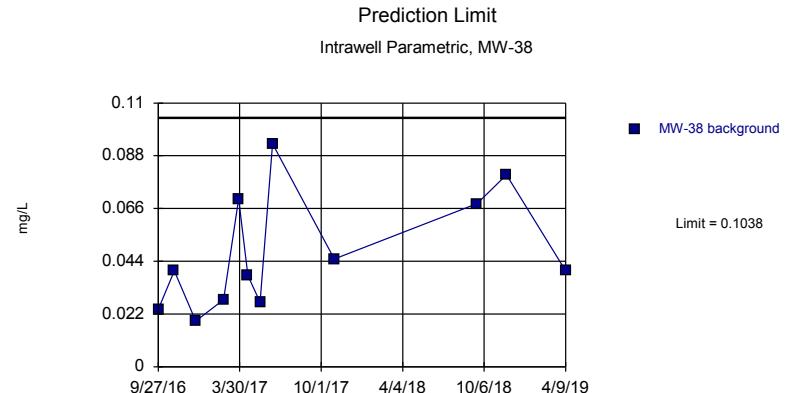
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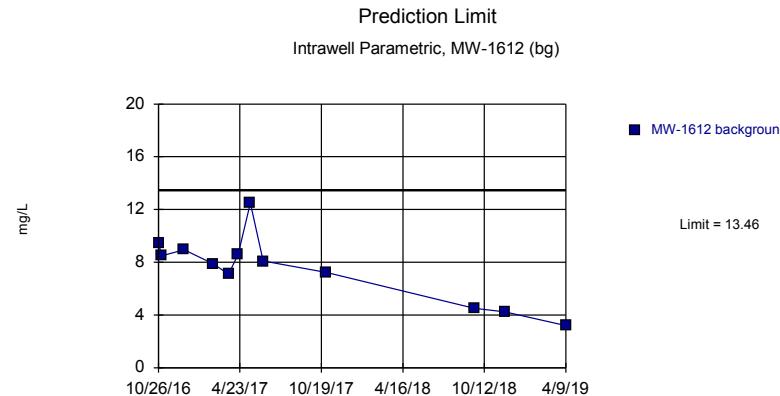
| Constituent | Well | Upper Lim. | Lower Lim. | Date | Observ. | Sig. | Bg | N Bg | Mean | Std. Dev. | %NDs | ND Adj. | Transform | Alpha | Method |
|-------------------------------------|---------|------------|------------|------|----------|------|----|---------|---------|-----------|------|---------|-----------|-----------------------------|--------|
| Boron, total (mg/L) | MW-1611 | 0.2535 | n/a | n/a | 1 future | n/a | 12 | 0.1653 | 0.03797 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Boron, total (mg/L) | MW-1612 | 0.7307 | n/a | n/a | 1 future | n/a | 12 | 0.5384 | 0.08279 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Boron, total (mg/L) | MW-26 | 0.2535 | n/a | n/a | 1 future | n/a | 12 | 0.1496 | 0.04475 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Boron, total (mg/L) | MW-27 | 0.3952 | n/a | n/a | 1 future | n/a | 12 | 0.2978 | 0.04195 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Boron, total (mg/L) | MW-30 | 0.3734 | n/a | n/a | 1 future | n/a | 12 | 0.2868 | 0.03727 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Boron, total (mg/L) | MW-38 | 0.1038 | n/a | n/a | 1 future | n/a | 12 | 0.04767 | 0.02417 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Boron, total (mg/L) | MW-39 | 0.2125 | n/a | n/a | 1 future | n/a | 12 | 0.1573 | 0.02381 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Calcium, total (mg/L) | MW-1611 | 26.2 | n/a | n/a | 1 future | n/a | 14 | n/a | n/a | 0 | n/a | n/a | 0.008612 | NP Intra (normality) 1 of 2 | |
| Calcium, total (mg/L) | MW-1612 | 13.46 | n/a | n/a | 1 future | n/a | 12 | 7.524 | 2.557 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Calcium, total (mg/L) | MW-26 | 64.85 | n/a | n/a | 1 future | n/a | 13 | 55.02 | 4.312 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Calcium, total (mg/L) | MW-27 | 1.887 | n/a | n/a | 1 future | n/a | 11 | 1.4 | 0.2028 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Calcium, total (mg/L) | MW-30 | 16.6 | n/a | n/a | 1 future | n/a | 12 | n/a | n/a | 0 | n/a | n/a | 0.01077 | NP Intra (normality) 1 of 2 | |
| Calcium, total (mg/L) | MW-38 | 58.63 | n/a | n/a | 1 future | n/a | 13 | 51.32 | 3.209 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Calcium, total (mg/L) | MW-39 | 12.4 | n/a | n/a | 1 future | n/a | 12 | n/a | n/a | 0 | n/a | n/a | 0.01077 | NP Intra (normality) 1 of 2 | |
| Chloride, total (mg/L) | MW-1611 | 10.41 | n/a | n/a | 1 future | n/a | 13 | 9.078 | 0.5843 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Chloride, total (mg/L) | MW-1612 | 47.58 | n/a | n/a | 1 future | n/a | 12 | 25.08 | 9.687 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Chloride, total (mg/L) | MW-26 | 7.267 | n/a | n/a | 1 future | n/a | 13 | 5.813 | 0.638 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Chloride, total (mg/L) | MW-27 | 1.902 | n/a | n/a | 1 future | n/a | 12 | 1.634 | 0.1156 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Chloride, total (mg/L) | MW-30 | 261 | n/a | n/a | 1 future | n/a | 12 | 249.7 | 4.887 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Chloride, total (mg/L) | MW-38 | 7.685 | n/a | n/a | 1 future | n/a | 12 | 7.264 | 0.1812 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Chloride, total (mg/L) | MW-39 | 3.106 | n/a | n/a | 1 future | n/a | 12 | 2.981 | 0.05384 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| pH, field (SU) | MW-1611 | 8.081 | 7.284 | n/a | 1 future | n/a | 14 | 7.683 | 0.1783 | 0 | None | No | 0.000752 | Param Intra 1 of 2 | |
| pH, field (SU) | MW-1612 | 8.756 | 7.849 | n/a | 1 future | n/a | 11 | 8.303 | 0.1891 | 0 | None | No | 0.000752 | Param Intra 1 of 2 | |
| pH, field (SU) | MW-26 | 8 | 7.23 | n/a | 1 future | n/a | 13 | n/a | n/a | 0 | n/a | n/a | 0.01938 | NP Intra (normality) 1 of 2 | |
| pH, field (SU) | MW-27 | 9.463 | 8.816 | n/a | 1 future | n/a | 11 | 9.139 | 0.1348 | 0 | None | No | 0.000752 | Param Intra 1 of 2 | |
| pH, field (SU) | MW-30 | 9.095 | 7.967 | n/a | 1 future | n/a | 11 | 8.531 | 0.235 | 0 | None | No | 0.000752 | Param Intra 1 of 2 | |
| pH, field (SU) | MW-38 | 7.601 | 6.554 | n/a | 1 future | n/a | 13 | 7.078 | 0.2298 | 0 | None | No | 0.000752 | Param Intra 1 of 2 | |
| pH, field (SU) | MW-39 | 8.79 | 8.058 | n/a | 1 future | n/a | 11 | 2.13 | 0.01812 | 0 | None | In(x) | 0.000752 | Param Intra 1 of 2 | |
| Sulfate, total (mg/L) | MW-1611 | 23.54 | n/a | n/a | 1 future | n/a | 12 | 19.03 | 1.94 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Sulfate, total (mg/L) | MW-1612 | 453.3 | n/a | n/a | 1 future | n/a | 12 | 206.7 | 106.2 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Sulfate, total (mg/L) | MW-26 | 11.5 | n/a | n/a | 1 future | n/a | 12 | 7.467 | 1.739 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Sulfate, total (mg/L) | MW-27 | 7.785 | n/a | n/a | 1 future | n/a | 12 | 4.817 | 1.278 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Sulfate, total (mg/L) | MW-30 | 31.21 | n/a | n/a | 1 future | n/a | 12 | 12.91 | 7.883 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Sulfate, total (mg/L) | MW-38 | 38.46 | n/a | n/a | 1 future | n/a | 12 | 31.63 | 2.941 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Sulfate, total (mg/L) | MW-39 | 0.2 | n/a | n/a | 1 future | n/a | 11 | n/a | n/a | 54.55 | n/a | n/a | 0.01276 | NP Intra (NDs) 1 of 2 | |
| Total Dissolved Solids [TDS] (mg/L) | MW-1611 | 440.8 | n/a | n/a | 1 future | n/a | 14 | 388.2 | 23.52 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Total Dissolved Solids [TDS] (mg/L) | MW-1612 | 1381 | n/a | n/a | 1 future | n/a | 11 | 973.1 | 169.8 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Total Dissolved Solids [TDS] (mg/L) | MW-26 | 402.3 | n/a | n/a | 1 future | n/a | 13 | 335.8 | 29.2 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Total Dissolved Solids [TDS] (mg/L) | MW-27 | 605.7 | n/a | n/a | 1 future | n/a | 12 | 23.27 | 0.5773 | 0 | None | sqrt(x) | 0.001504 | Param Intra 1 of 2 | |
| Total Dissolved Solids [TDS] (mg/L) | MW-30 | 1366 | n/a | n/a | 1 future | n/a | 11 | 1248 | 48.95 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Total Dissolved Solids [TDS] (mg/L) | MW-38 | 469.3 | n/a | n/a | 1 future | n/a | 13 | 414 | 24.27 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |
| Total Dissolved Solids [TDS] (mg/L) | MW-39 | 445 | n/a | n/a | 1 future | n/a | 12 | 365.8 | 34.14 | 0 | None | No | 0.001504 | Param Intra 1 of 2 | |



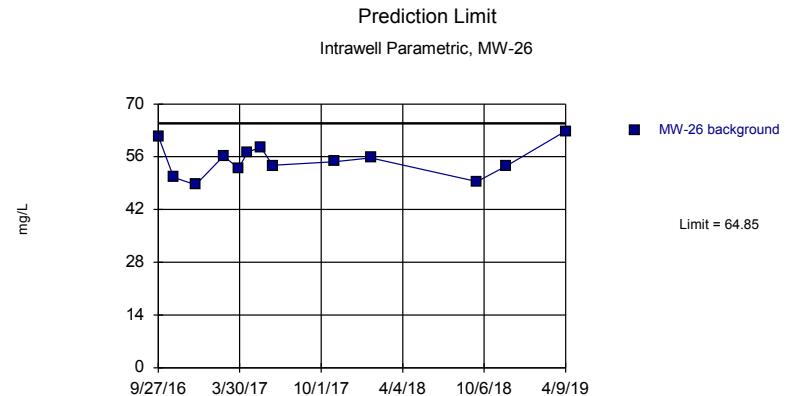


Background Data Summary: Mean=0.2868, Std. Dev.=0.03727, n=12. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9304, critical = 0.805. Kappa = 2.322 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.





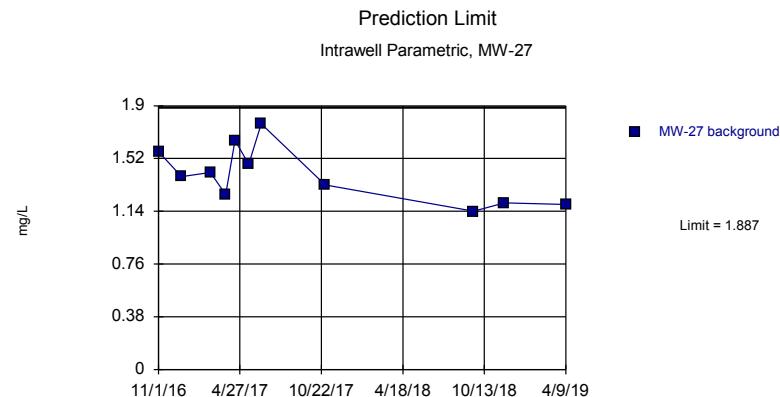
Background Data Summary: Mean=7.524, Std. Dev.=2.557, n=12. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9419, critical = 0.805. Kappa = 2.322 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.



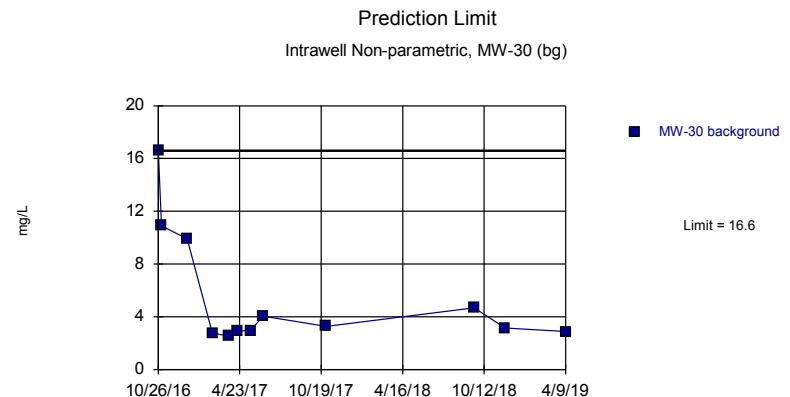
Background Data Summary: Mean=55.02, Std. Dev.=4.312, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9682, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Calcium, total Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Constituent: Calcium, total Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



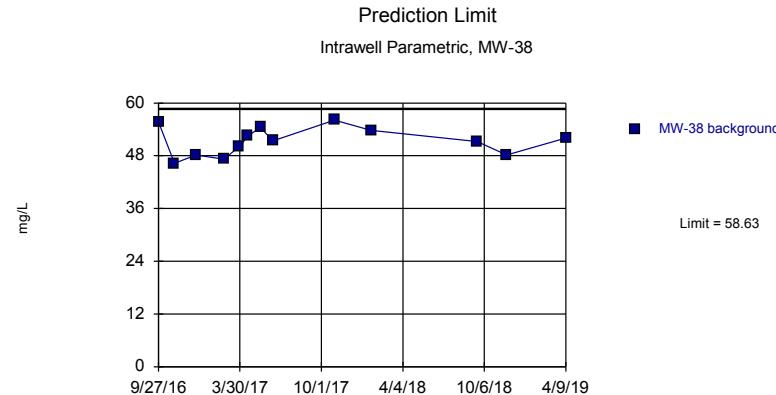
Background Data Summary: Mean=1.4, Std. Dev.=0.2028, n=11. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9546, critical = 0.792. Kappa = 2.4 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.



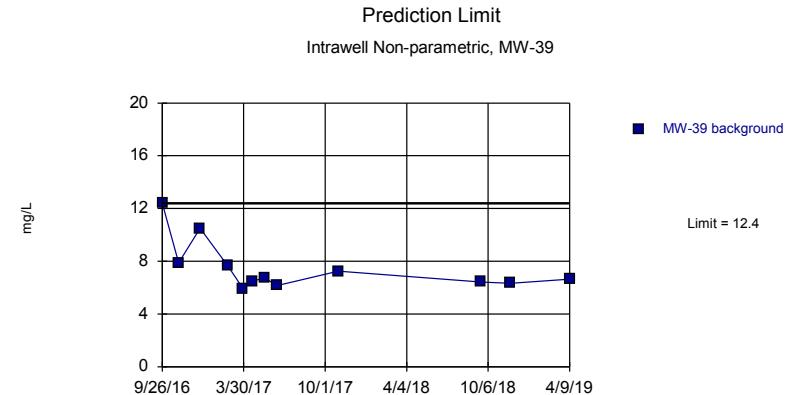
Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 12 background values. Well-constituent pair annual alpha = 0.02143. Individual comparison alpha = 0.01077 (1 of 2). Assumes 1 future value.

Constituent: Calcium, total Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Constituent: Calcium, total Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



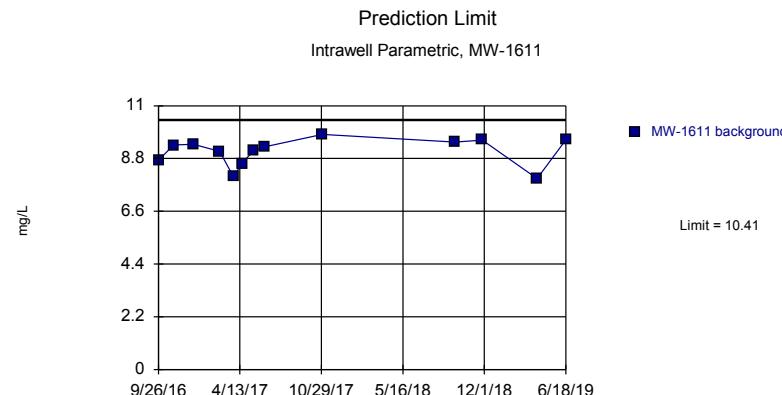
Background Data Summary: Mean=51.32, Std. Dev.=3.209, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9565, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.



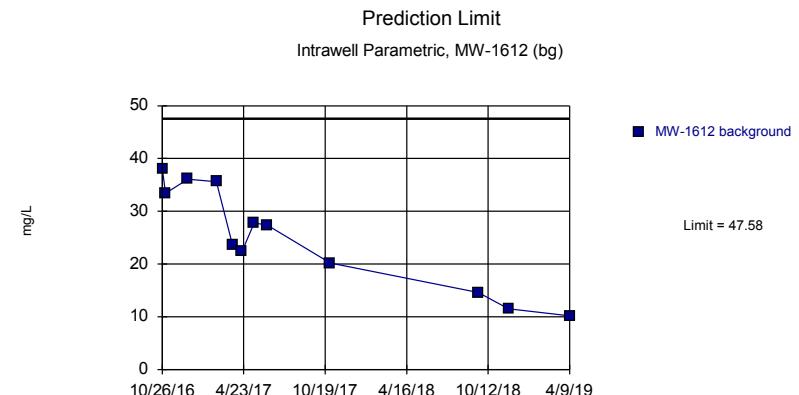
Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 12 background values. Well-constituent pair annual alpha = 0.02143. Individual comparison alpha = 0.01077 (1 of 2). Assumes 1 future value.

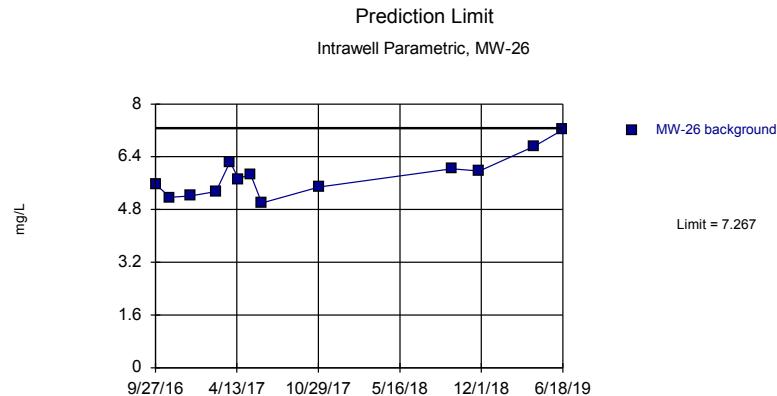
Constituent: Calcium, total Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Constituent: Calcium, total Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

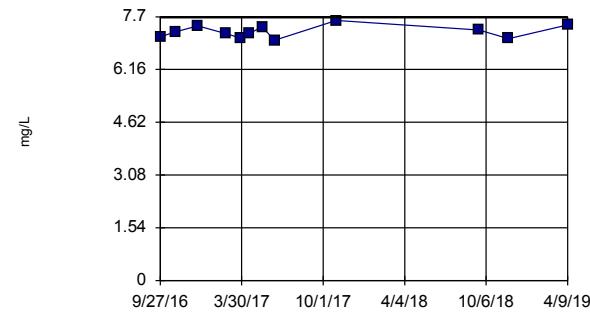


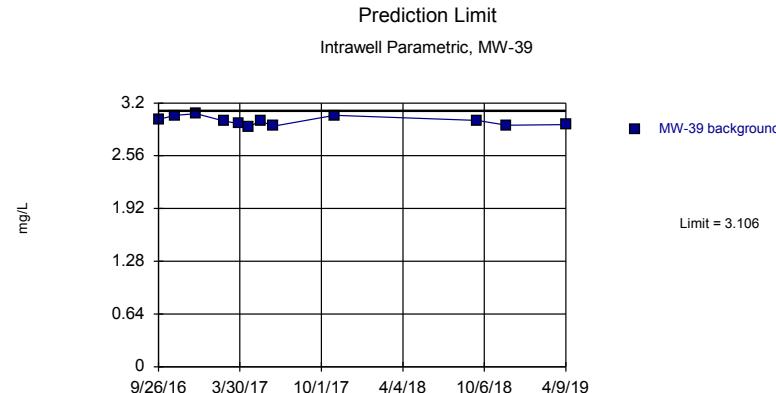
Background Data Summary: Mean=9.078, Std. Dev.=0.5843, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8886, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.



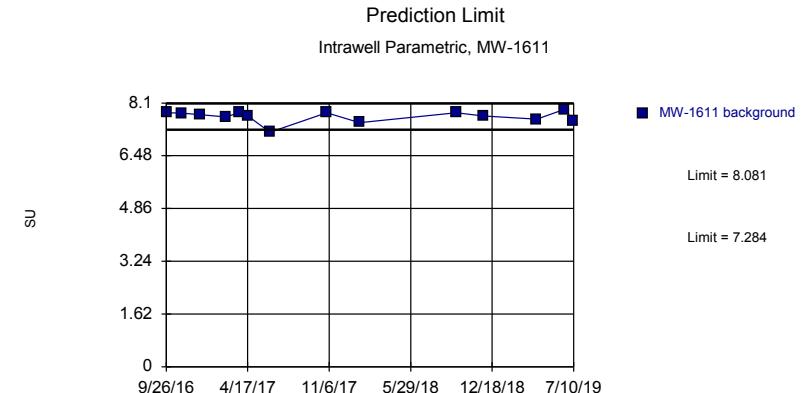


Constituent: Chloride, total Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Prediction Limit
Intrawell Parametric, MW-38



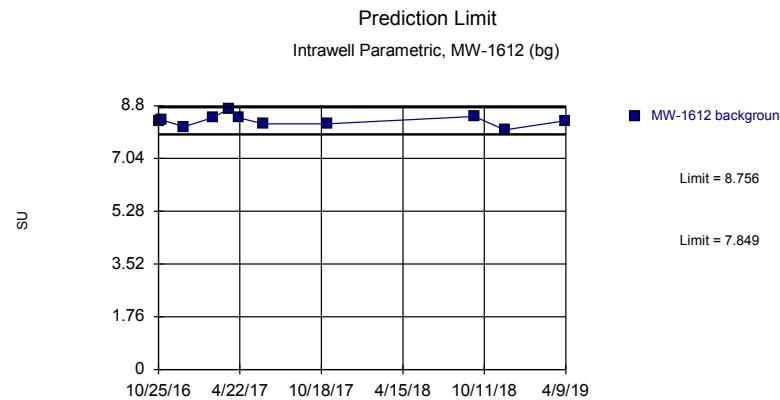
Background Data Summary: Mean=2.981, Std. Dev.=0.05384, n=12. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9297, critical = 0.805. Kappa = 2.322 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.



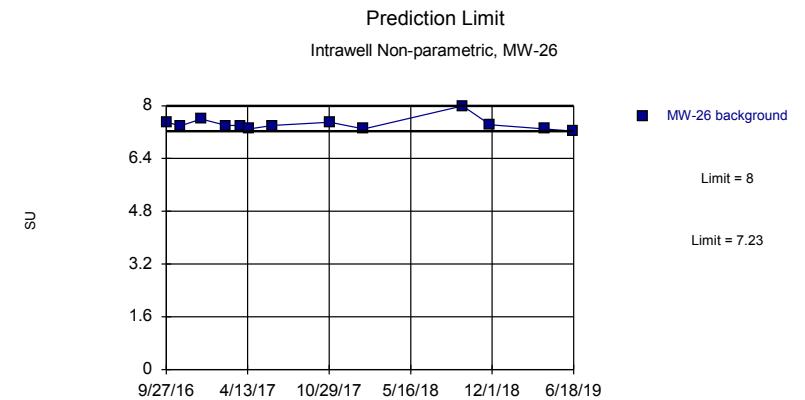
Background Data Summary: Mean=7.683, Std. Dev.=0.1783, n=14. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8528, critical = 0.825. Kappa = 2.236 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Chloride, total Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Constituent: pH, field Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



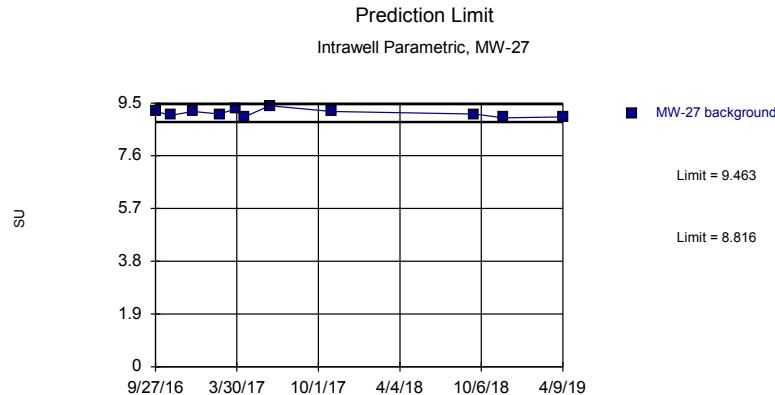
Background Data Summary: Mean=8.303, Std. Dev.=0.1891, n=11. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9684, critical = 0.792. Kappa = 2.4 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.



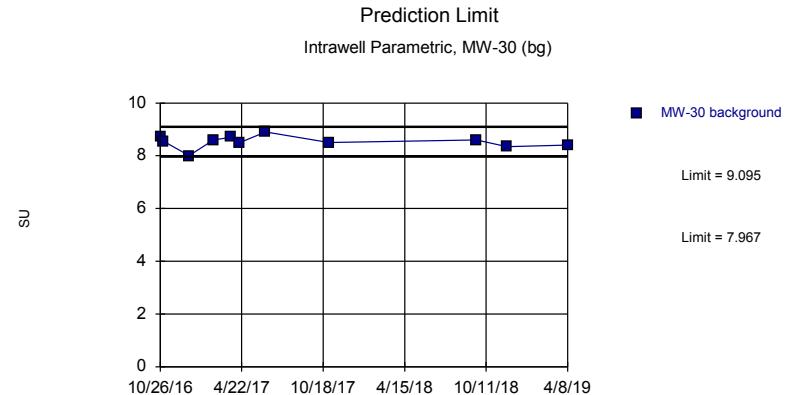
Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limits are highest and lowest of 13 background values. Well-constituent pair annual alpha = 0.03858. Individual comparison alpha = 0.01938 (1 of 2). Assumes 1 future value.

Constituent: pH, field Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Constituent: pH, field Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



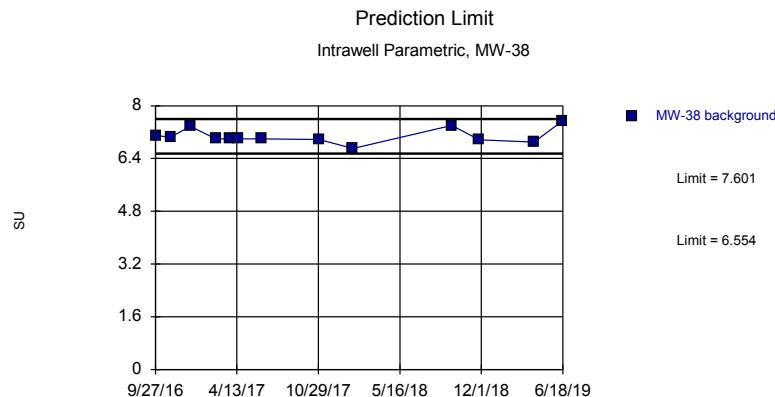
Background Data Summary: Mean=9.139, Std. Dev.=0.1348, n=11. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9363, critical = 0.792. Kappa = 2.4 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.



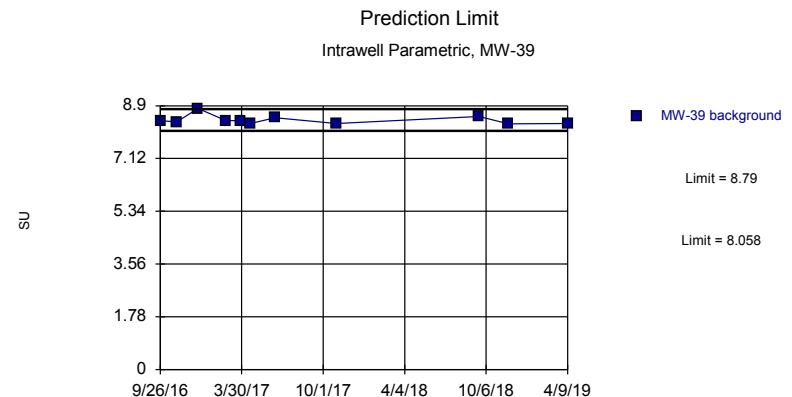
Background Data Summary: Mean=8.531, Std. Dev.=0.235, n=11. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9453, critical = 0.792. Kappa = 2.4 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: pH, field Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Constituent: pH, field Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



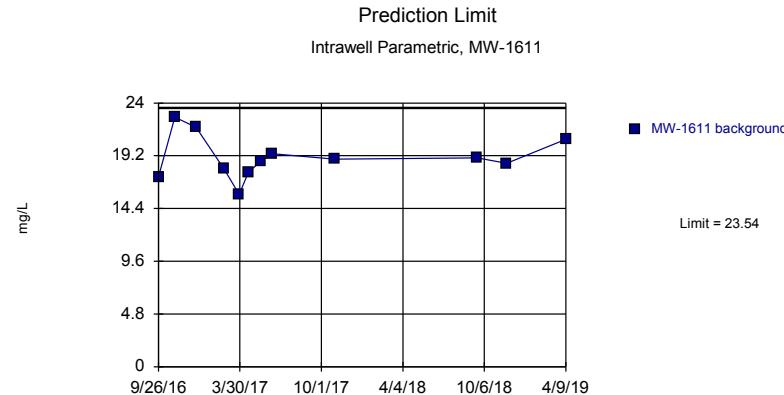
Background Data Summary: Mean=7.078, Std. Dev.=0.2298, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8713, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

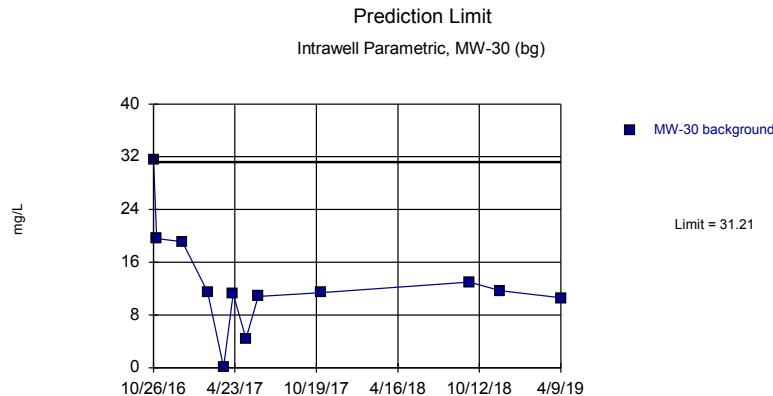


Background Data Summary (based on natural log transformation): Mean=2.13, Std. Dev.=0.01812, n=11. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.793, critical = 0.792. Kappa = 2.4 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: pH, field Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

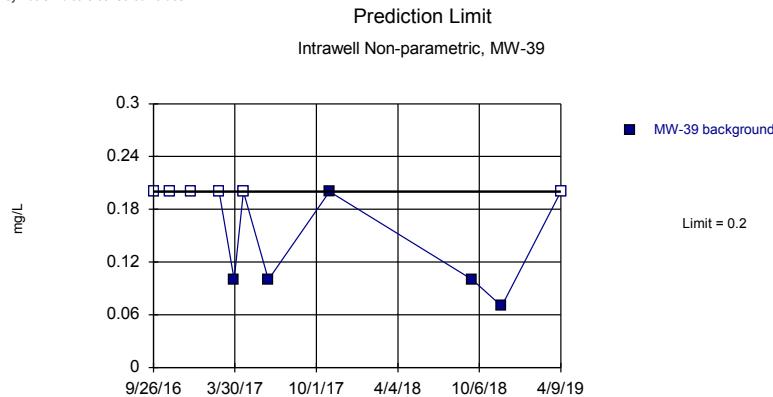
Constituent: pH, field Analysis Run 11/22/2019 9:12 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill





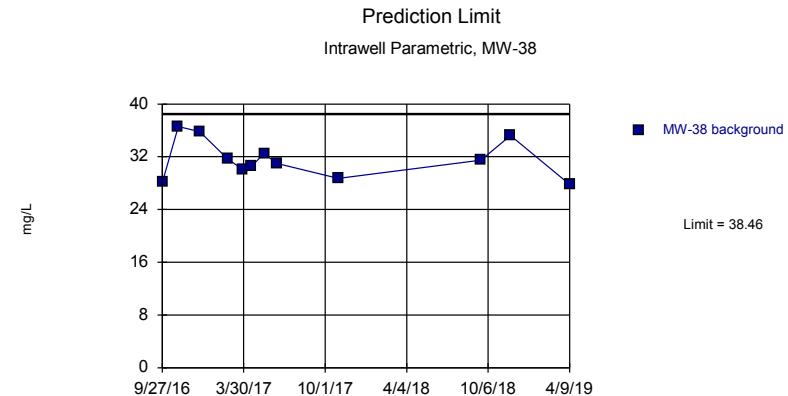
Background Data Summary: Mean=12.91, Std. Dev.=7.883, n=12. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.888, critical = 0.805. Kappa = 2.322 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Sulfate, total Analysis Run 11/22/2019 9:13 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



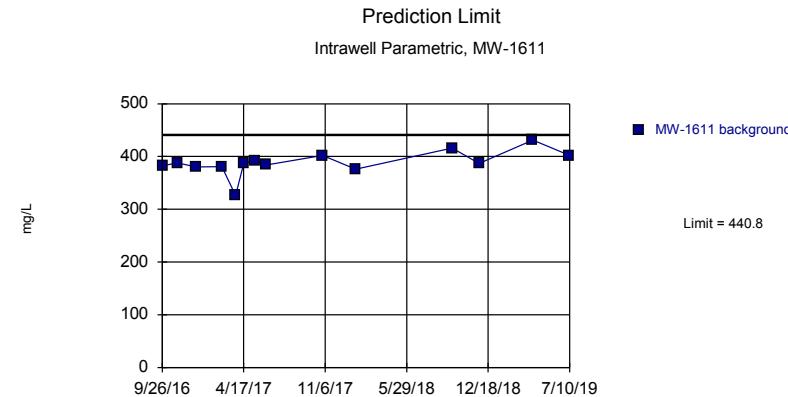
Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 11 background values. 54.55% NDs. Well-constituent pair annual alpha = 0.02537. Individual comparison alpha = 0.01276 (1 of 2). Assumes 1 future value.

Constituent: Sulfate, total Analysis Run 11/22/2019 9:13 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



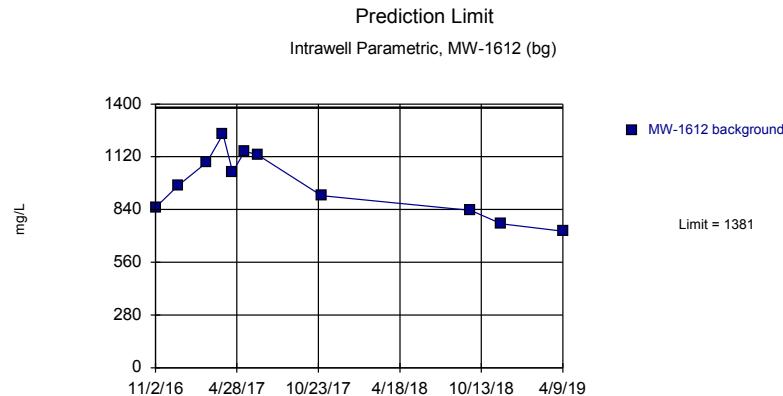
Background Data Summary: Mean=31.63, Std. Dev.=2.941, n=12. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9291, critical = 0.805. Kappa = 2.322 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Sulfate, total Analysis Run 11/22/2019 9:13 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

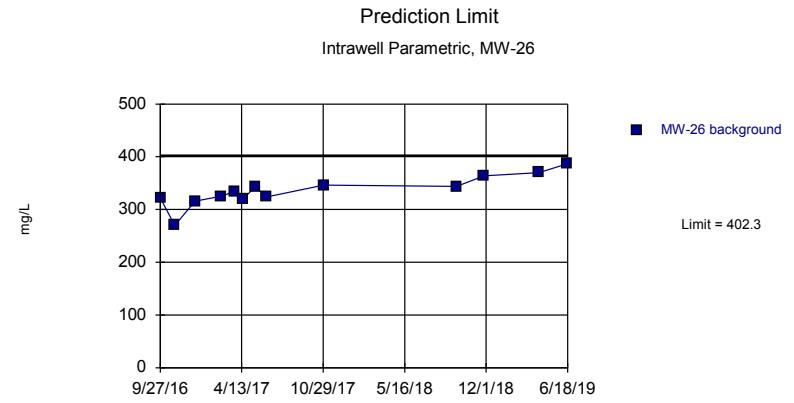


Background Data Summary: Mean=388.2, Std. Dev.=23.52, n=14. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.871, critical = 0.825. Kappa = 2.236 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Total Dissolved Solids [TDS] Analysis Run 11/22/2019 9:13 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



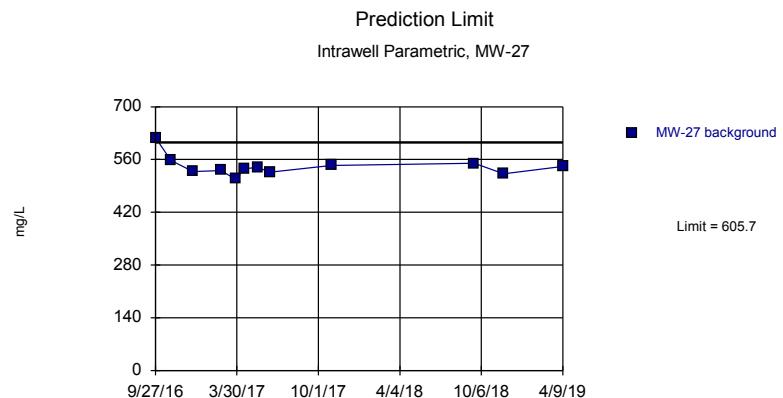
Background Data Summary: Mean=973.1, Std. Dev.=169.8, n=11. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9601, critical = 0.792. Kappa = 2.4 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.



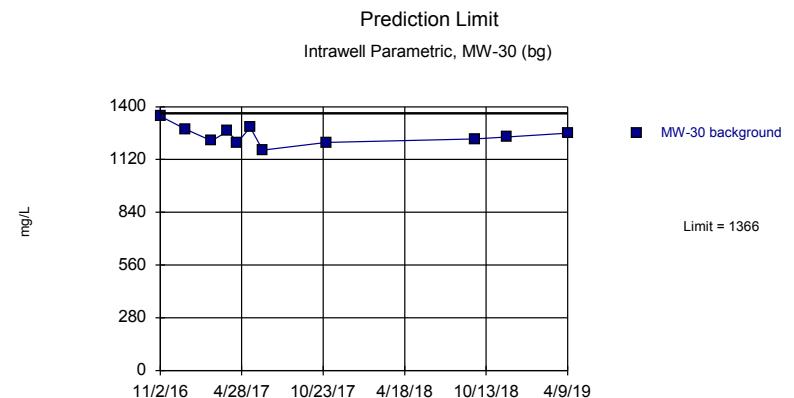
Background Data Summary: Mean=335.8, Std. Dev.=29.2, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.949, critical = 0.814. Kappa = 2.279 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Total Dissolved Solids [TDS] Analysis Run 11/22/2019 9:13 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Constituent: Total Dissolved Solids [TDS] Analysis Run 11/22/2019 9:13 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



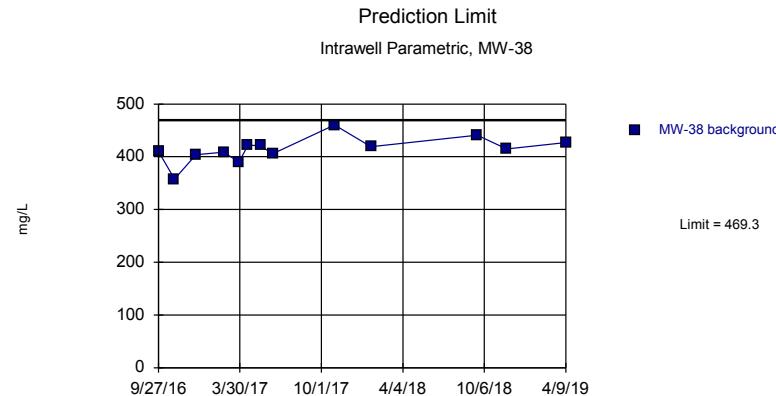
Background Data Summary (based on square root transformation): Mean=23.27, Std. Dev.=0.5773, n=12. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8148, critical = 0.805. Kappa = 2.322 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.



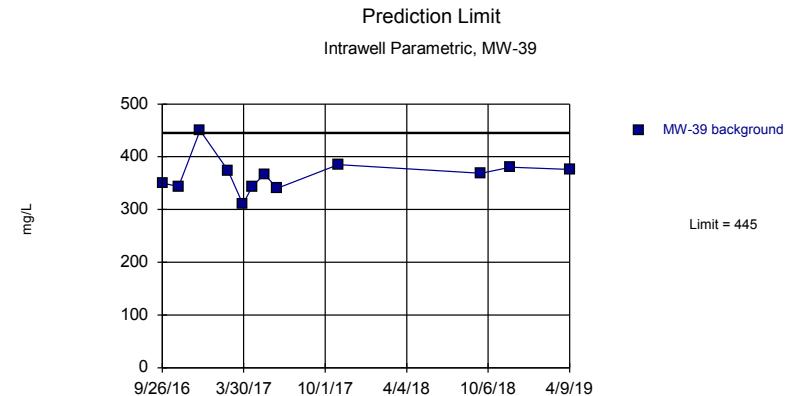
Background Data Summary: Mean=1248, Std. Dev.=48.95, n=11. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9691, critical = 0.792. Kappa = 2.4 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Total Dissolved Solids [TDS] Analysis Run 11/22/2019 9:13 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

Constituent: Total Dissolved Solids [TDS] Analysis Run 11/22/2019 9:13 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



Background Data Summary: Mean=414, Std. Dev.=24.27, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9442, 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.



Background Data Summary: Mean=365.8, Std. Dev.=34.14, n=12. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8998, critical = 0.805. Kappa = 2.322 (c=7, w=5, 1 of 2, event alpha = 0.05132). Report alpha = 0.001504. Assumes 1 future value.

Constituent: Total Dissolved Solids [TDS] Analysis Run 11/22/2019 9:13 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

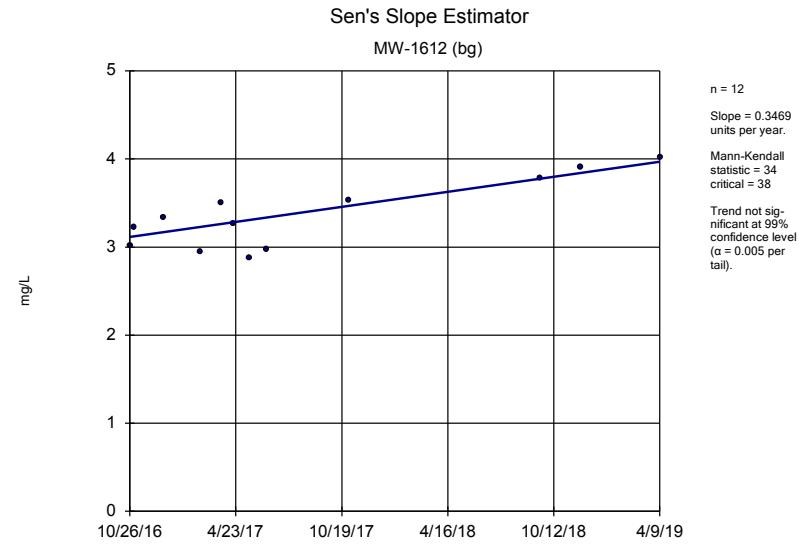
Constituent: Total Dissolved Solids [TDS] Analysis Run 11/22/2019 9:13 AM View: Intrawell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

FIGURE F: TREND TESTS

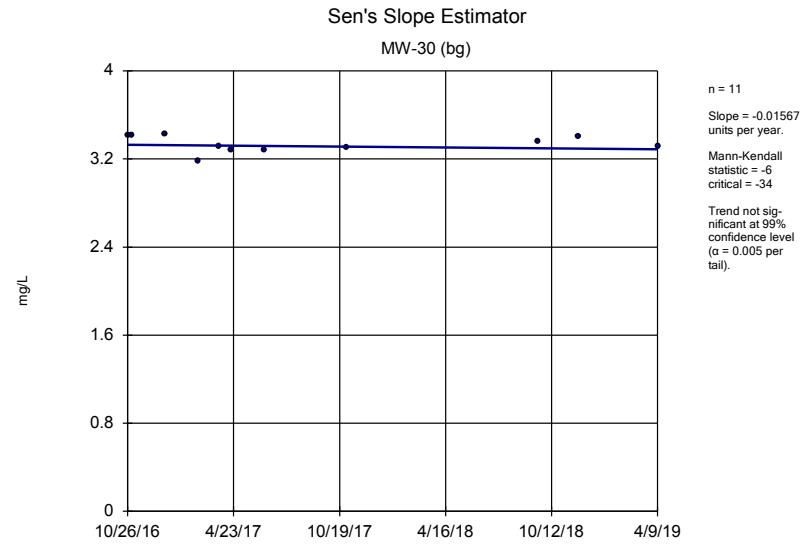
Interwell Trend Tests Summary Table - All Results

Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill Printed 10/15/2019, 2:27 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> |
|------------------------|--------------|--------------|--------------|-----------------|-------------|----------|-------------|------------------|--------------|--------------|---------------|
| Fluoride, total (mg/L) | MW-1612 (bg) | 0.3469 | 34 | 38 | No | 12 | 0 | n/a | n/a | 0.01 | NP |
| Fluoride, total (mg/L) | MW-30 (bg) | -0.01567 | -6 | -34 | No | 11 | 0 | n/a | n/a | 0.01 | NP |



Constituent: Fluoride, total Analysis Run 10/15/2019 2:27 PM View: Interwell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill



Constituent: Fluoride, total Analysis Run 10/15/2019 2:27 PM View: Interwell
Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill

**FIGURE G: INTERWELL PREDICTION
LIMITS**

Interwell Prediction Limit Summary Table - All Results

Mountaineer Landfill Client: Geosyntec Data: Mountaineer Landfill Printed 10/15/2019, 2:32 PM

| Constituent | Well | Upper Lim. | Lower Lim. | Date | Observ. | Sig. | Bg N | Bg Mean | Std. Dev. | %NDs | ND Adj. | Transform | Alpha | Method |
|------------------------|------|------------|------------|------|----------|------|------|---------|-----------|------|---------|-----------|----------|--------------------|
| Fluoride, total (mg/L) | n/a | 3.912 | n/a | n/a | 5 future | n/a | 23 | 3.351 | 0.279 | 0 | None | No | 0.001504 | Param Inter 1 of 2 |

Memorandum

Date: August 3, 2020

To: David Miller (AEP)

Copies to: Benjamin Kepchar (AEP)

From: Allison Kreinberg (Geosyntec)

Subject: Evaluation of Detection Monitoring Data at
Mountaineer Plant's Landfill (LF)

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 Subpart D, "CCR rule"), the first semi-annual detection monitoring event of 2020 at the Landfill (LF), an existing CCR unit at the Mountaineer Power Plant located in New Haven, West Virginia, was completed on May 15, 2020. Based on the results, verification sampling was completed on July 8, 2020.

Background values for the LF were previously calculated in January 2018. After a minimum of four detection monitoring events, the results of those events were compared to the existing background dataset, and the background dataset was updated as appropriate. Revised upper prediction limits (UPLs) were calculated for each Appendix III parameter to represent background values. Lower prediction limits (LPLs) were also calculated for pH. Details on the calculation of these revised background values are described in Geosyntec's *Statistical Analysis Summary* report, dated January 6, 2020.

To achieve an acceptably high statistical power while maintaining a site-wide false-positive rate (SWFPR) of 10% per year or less, prediction limits were calculated based on a one-of-two retesting procedure. With this procedure, a statistically significant increase (SSI) is only concluded if both samples in a series of two exceeds the UPL. In practice, if the initial result did not exceed the UPL, a second sample was not collected or analyzed.

Detection monitoring results and the relevant background values are compared in Table 1. No SSIs were observed at the Mountaineer LF CCR unit, and as a result the Mountaineer LF will remain in detection monitoring.

Evaluation of Detection Monitoring Data – Mountaineer LF

August 3, 2020

Page 2

The statistical analysis was conducted within 90 days of completion of sampling and analysis in accordance with 40 CFR 257.93(h)(2). A certification of these statistics by a qualified professional engineer is provided in Attachment A.

Table 1: Detection Monitoring Data Evaluation
Mountaineer - Landfill

Geosyntec Consultants, Inc.

| Parameter | Unit | Description | MW-26 | | MW-27 | | MW-38 | MW-39 | | MW-1611 |
|------------------------|------|----------------------------------|-----------|----------|-----------|----------|-----------|-----------|----------|-----------|
| | | | 5/15/2020 | 7/8/2020 | 5/15/2020 | 7/8/2020 | 5/15/2020 | 5/15/2020 | 7/8/2020 | 5/15/2020 |
| Boron | mg/L | Intrawell Background Value (UPL) | 0.254 | | 0.395 | | 0.104 | 0.213 | | 0.254 |
| | | Analytical Result | 0.100 | -- | 0.100 | -- | 0.02 | 0.148 | -- | 0.135 |
| Calcium | mg/L | Intrawell Background Value (UPL) | 64.9 | | 1.89 | | 58.6 | 12.4 | | 26.2 |
| | | Analytical Result | 55.6 | -- | 54.5 | 1.20 | 44.7 | 6.15 | -- | 24.0 |
| Chloride | mg/L | Intrawell Background Value (UPL) | 7.27 | | 1.90 | | 7.69 | 3.11 | | 10.4 |
| | | Analytical Result | 1.72 | -- | 6.06 | 1.63 | 7.50 | 3.11 | -- | 9.35 |
| Fluoride | mg/L | Interwell Background Value (UPL) | | | 3.91 | | | | | |
| | | Analytical Result | 2.56 | -- | 0.14 | -- | 0.35 | 0.84 | -- | 0.61 |
| pH | SU | Intrawell Background Value (UPL) | 8.0 | | 9.5 | | 7.6 | 8.8 | | 8.1 |
| | | Intrawell Background Value (LPL) | 7.2 | | 8.8 | | 6.6 | 8.1 | | 7.3 |
| | | Analytical Result | 7.1 | 7.4 | 8.8 | 9.1 | 6.7 | 7.9 | 8.4 | 7.3 |
| | | | | | | | 0.200 | | | 23.5 |
| Sulfate | mg/L | Intrawell Background Value (UPL) | 11.5 | | 7.79 | | 38.5 | | | |
| | | Analytical Result | 3.9 | -- | 7.0 | -- | 33.5 | 0.2 | -- | 20.8 |
| Total Dissolved Solids | mg/L | Intrawell Background Value (UPL) | 402 | | 606 | | 469 | 445 | | 441 |
| | | Analytical Result | 547 | 366 | 359 | -- | 404 | 374 | -- | 404 |

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

Bold values exceed the background value.

Background values are shaded gray.

--: Not analyzed

ATTACHMENT A

Certification by a Qualified Professional Engineer

CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER

I certify that the selected statistical method, described above and in the January 6, 2020 *Statistical Analysis Summary* report, is appropriate for evaluating the groundwater monitoring data for the Mountaineer LF 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

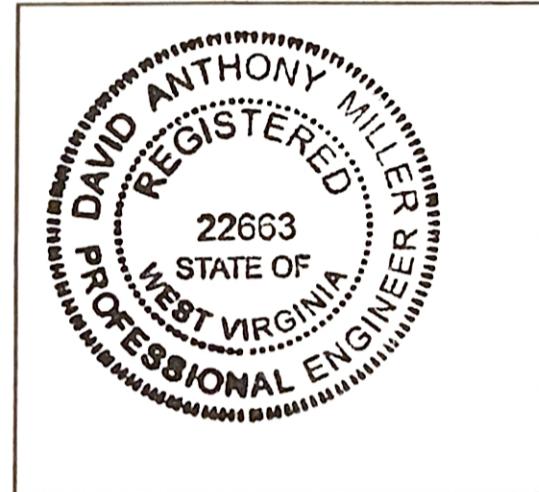
David Anthony Miller

Signature

22663
License Number

WEST VIRGINIA
Licensing State

08.07.2020
Date



APPENDIX 3 – Alternative Source Demonstrations

No alternative source demonstrations were necessary in 2020.

APPENDIX 4 - Notices for Monitoring Program Transitions

Not applicable at this time.

APPENDIX 5 - Well Installation/Decommissioning Logs

Not applicable at this time.

EPA ADDITIONAL INFORMATION REQUEST

ATTACHMENT C

MOUNTAINEER PLANT LANDFILL

**MONITORING WELLS MW-38 AND MW-39 BORING LOG AND
CONSTRUCTION FORMS**

AMERICAN ELECTRIC POWER SERVICE CORPORATION
 AEP CIVIL ENGINEERING LABORATORY
 MONITORING WELL CONSTRUCTION



JOB NUMBER _____

COMPANY APPALACHIAN POWER COMPANY

WELL No. MW-38 BORING No. B-0502 INSTALLED 9/8/05

PROJECT MOUNTAINEER PLANT

COORDINATES N 713,736.0 E 1,732,795.5

SYSTEM State Plane using NAD27

GROUND ELEVATION 627.70 FT.



GROUT SEAL: Hole Plug



BENTONITE SEAL: 125 lbs Bentonite Pellets



SCREEN: 2.0" dia., 15' Prepacked Screen, 20 SLOT,
15.0'



GRAVEL PACK: 750 lbs #4 sand / 50 lbs #7 sand



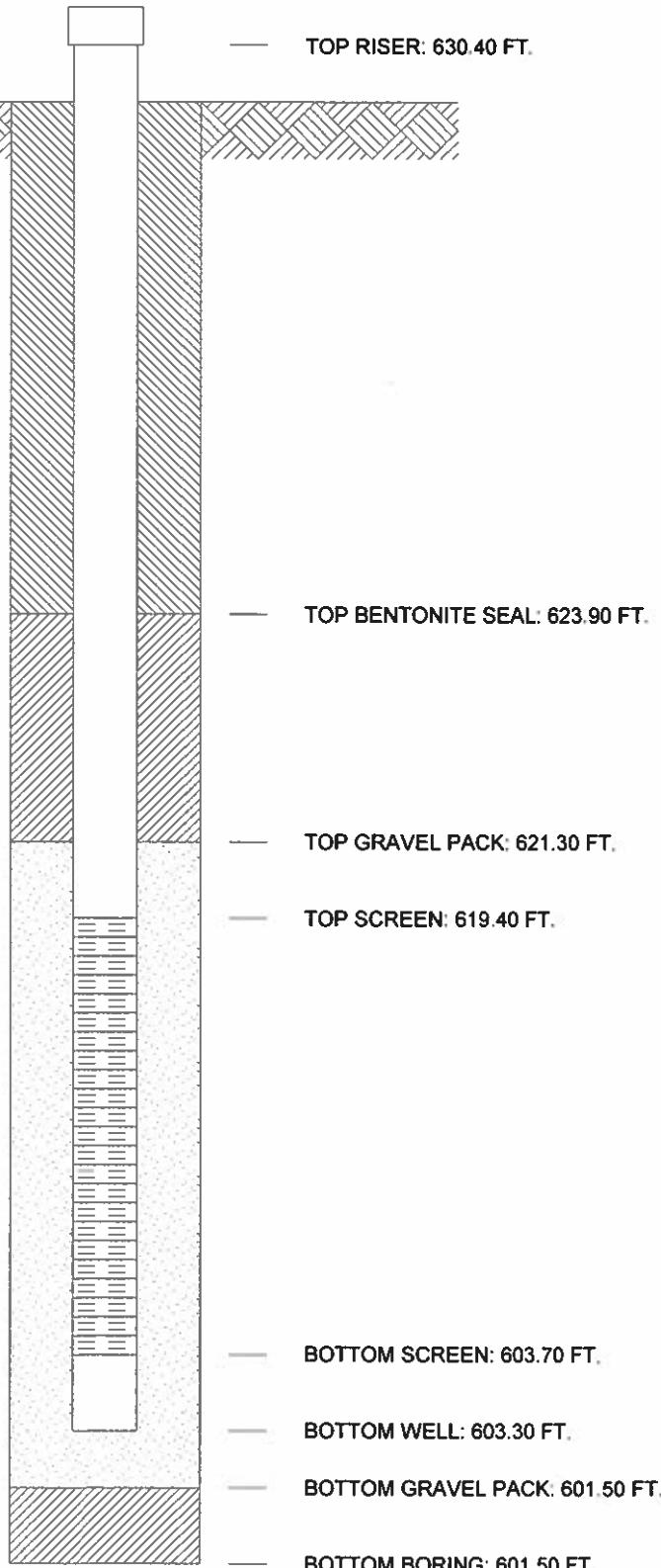
RISER PIPE: 2.0, dia., PVC



SPACERS, DEPTH: 23'

NOTES:

- SWL = Dry @ installation
- Drilled with 6.25" HSA's
- Hydrated pellets
- Bladder pump set @ 22.4'
- Hole plug from 3.8' to grade



AMERICAN ELECTRIC POWER SERVICE CORPORATION
 AEP CIVIL ENGINEERING LABORATORY
 MONITORING WELL CONSTRUCTION



JOB NUMBER _____

COMPANY APPALACHIAN POWER COMPANY

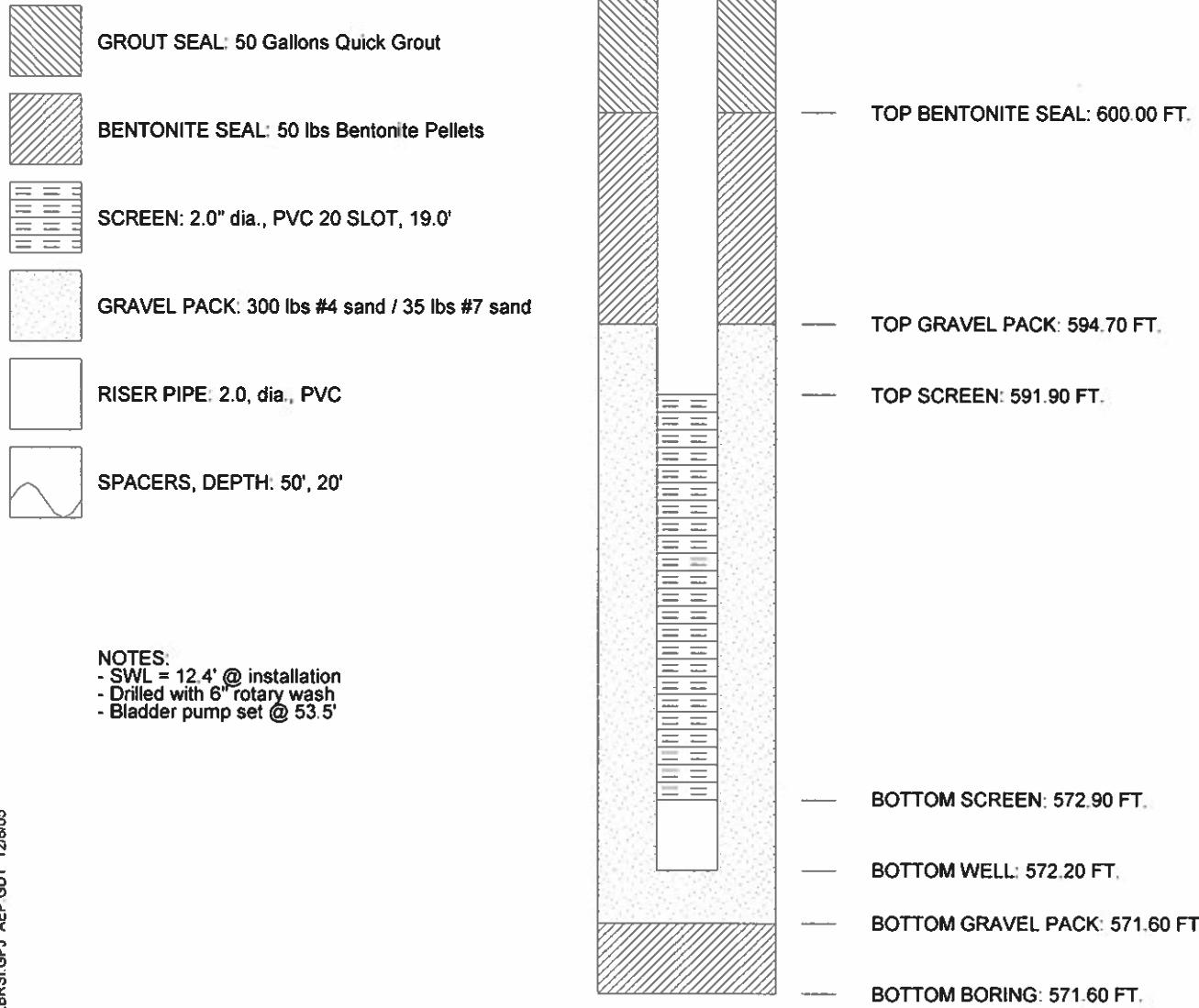
WELL No MW-39 BORING No. B-0502 INSTALLED 9/7/05

PROJECT MOUNTAINEER PLANT

COORDINATES N 713,734.6 E 1,732,787.2

SYSTEM State Plane using NAD27

GROUND ELEVATION 627.70 FT.



AMERICAN ELECTRIC POWER SERVICE CORPORATION
AEP CIVIL ENGINEERING LABORATORY
LOG OF BORING



JOB NUMBER _____

COMPANY APPALACHIAN POWER COMPANY

PROJECT MOUNTAINEER PLANT

COORDINATES _____

GROUND ELEVATION SYSTEM _____

| | | | |
|-------------|--------|---------|---------|
| WATER LEVEL | 3.8 | 3.8 | 4.1 |
| TIME | 8:00AM | 12:30PM | 8:30AM |
| DATE | 1/5/05 | 1/11/05 | 1/13/05 |

BORING NO. B0502 DATE 8/24/05 SHEET 1 OF 9
 BORING START 1/4/05 BORING FINISH 6/23/05
 PIEZOMETER TYPE _____ WELL TYPE GM
 HGT. RISER ABOVE GROUND _____ DIA 1"
 DEPTH TO TOP OF WELL SCREEN BOTTOM
 WELL DEVELOPMENT BACKFILL BENSEAL
 FIELD PARTY MCR / CB RIG BK-81

| SAMPLE NUMBER | SAMPLE | SAMPLE DEPTH IN FEET | STANDARD PENETRATION RESISTANCE BLOWS / 6" | TOTAL LENGTH RECOVERY % | RQD | DEPTH IN FEET | GRAPHIC LOG | USCS | SOIL / ROCK IDENTIFICATION | WELL | DRILLER'S NOTES |
|---------------|--------|----------------------|--|-------------------------|-----|---------------|-------------|------|--|------|-----------------|
| 1 | SS | 0.0 | 1.5 | 2-3-3 | 0.8 | | | | MEDIUM STIFF 5YR 5/6 LIGHT BROWN SILTY CLAY 3.5 tsf, moist | | |
| 2 | SS | 1.5 | 3.0 | 2-2-3 | 0.6 | | | | MEDIUM STIFF 5YR 5/6 LIGHT BROWN SILTY CLAY 1.5 tsf, w/ trace of fine sand, moist | | |
| 3 | SS | 3.0 | 4.5 | 1-2-2 | 0.5 | | | | | | |
| 4 | SS | 4.5 | 6.0 | 2-5-7 | 1.5 | | | 5 | STIFF 5YR 5/6 LIGHT BROWN CLAY 1.75 tsf, moist | | |
| 5 | SS | 6.0 | 7.5 | 2-5-7 | 1.5 | | | | | | |
| 6 | SS | 7.5 | 9.0 | 1-3-5 | 1.5 | | | | STIFF 5YR 5/6 LIGHT BROWN CLAY 1.25 tsf, moist | | |
| 7 | SS | 9.0 | 10.5 | 2-4-5 | 1.5 | | | 10 | STIFF 5YR 5/6 LIGHT BROWN CLAY 2.0 tsf, moist | | |
| 8 | SS | 10.5 | 12.0 | 2-3-6 | 1.5 | | | | STIFF 10YR 6/2 PALE YELLOWISH BROWN CLAY 1.75 tsf, moist | | |
| 9 | SS | 12.0 | 13.5 | 2-4-6 | 1.4 | | | | STIFF 10YR 6/2 PALE YELLOWISH BROWN CLAY 1.5 tsf, moist | | |
| 10 | SS | 13.5 | 15.0 | 2-5-6 | 1.5 | | | | STIFF 10YR 6/2 PALE YELLOWISH BROWN CLAY 2.25 tsf, moist | | |
| 11 | SS | 15.0 | 16.5 | 3-3-5 | 1.4 | | | 15 | STIFF 5G 6/1 GREENISH GRAY CLAY 1.75 tsf, w/ trace of fine sand, moist | | |
| 12 | SS | 16.5 | 18.0 | 3-5-7 | 1.0 | | | | STIFF 10YR 6/6 DARK YELLOWISH ORANGE CLAY 1.5 tsf, moist | | |
| 13 | SS | 18.0 | 19.5 | 2-3-6 | 1.2 | | | | STIFF 5YR 4/4 MODERATE BROWN CLAY 1.5 tsf, moist | | |
| 14 | SS | 19.5 | 21.0 | 4-5-6 | 0.9 | | | 20 | STIFF 5YR 4/4 MODERATE BROWN CLAY 1.75 tsf, moist | | |
| 15 | SS | 21.0 | 22.5 | 4-5-7 | 1.2 | | | | STIFF 5GY 4/1 DARK GREENISH GRAY CLAY 1.5 tsf, moist | | |
| 16 | SS | 22.5 | 24.0 | 2-5-7 | 1.2 | | | | STIFF 5GY 4/1 DARK GREENISH GRAY CLAY 1.5 tsf, w/ trace of fine sand, moist | | |
| 17 | SS | 24.0 | 25.5 | 1-3-4 | 1.3 | | | | MEDIUM STIFF 10YR 6/6 DARK | | |

TYPE OF CASING USED

Continued Next Page

| | |
|---|-----------------------|
| X | NQ-2 ROCK CORE |
| X | 6" x 3.25 HSA |
| | 9" x 6.25 HSA |
| | HW CASING ADVANCER 4" |
| | NW CASING 3" |
| | SW CASING 6" |
| | AIR HAMMER 8" |

PIEZOMETER TYPE: PT = OPEN TUBE POROUS TIP, SS = OPEN TUBE SLOTTED SCREEN, G = GEONOR, P = PNEUMATIC

WELL TYPE: OW = OPEN TUBE SLOTTED SCREEN, GM = GEOMON

RECORDER MCR / CB

AMERICAN ELECTRIC POWER SERVICE CORPORATION
AEP CIVIL ENGINEERING LABORATORY
LOG OF BORING



JOB NUMBER _____

COMPANY APPALACHIAN POWER COMPANYBORING NO. B0502 DATE 8/24/05 SHEET 2 OF 9PROJECT MOUNTAINEER PLANTBORING START 1/4/05BORING FINISH 6/23/05

| SAMPLE NUMBER | SAMPLE | SAMPLE DEPTH IN FEET | | STANDARD PENETRATION RESISTANCE BLOWS / 6" | TOTAL LENGTH RECOVERY | RQD % | DEPTH IN FEET | GRAPHIC LOG | USCS | SOIL / ROCK IDENTIFICATION | WELL | DRILLER'S NOTES |
|---------------|--------|----------------------|--|--|-----------------------|-------|---------------|-------------|------|--|------|--|
| 18 | SS | 25.5 | | 27.0 | 3-5-12 | 1.2 | | | | YELLOWISH ORANGE CLAY 2.25 tsf, w/ some shale fragments, moist VERY STIFF 10G 6/2 PALE GREEN SHALEY CLAY 2.0 tsf, moist HARD 10G 6/2 PALE GREEN SHALEY CLAY Moist | | |
| 19 | SS | 27.0 | | 27.3 | 50/.3 | 0.2 | | | | | | |
| 20 | SS | 28.5 | | 28.9 | 50/.4 | 0.5 | | | | | | |
| 21 | NQ2 | 29.5 | | 35.7 | | | 5.3 | 100 | | 6B 5/1 MEDIUM BLUISH GRAY CLAY SHALE Soft broken area from 37.0' to 37.4' | | Auger refusal @ 29.5'; started coring. |
| 22 | NQ2 | 35.7 | | 45.7 | | | 9.3 | 90 | | | | |
| 23 | NQ2 | 45.7 | | 55.7 | | | 4.4 | 30 | | 5R 4/2 GRAYISH RED CLAY SHALE | | Reason for poor recovery - Core lifter stuck in end of inner tube and washed core away |
| 24 | NQ2 | 55.7 | | 65.7 | | | 9.8 | 87 | | 5B 5/1 MEDIUM BLUISH GRAY CLAY | | |

AMERICAN ELECTRIC POWER SERVICE CORPORATION
AEP CIVIL ENGINEERING LABORATORY
LOG OF BORING



JOB NUMBER _____

COMPANY APPALACHIAN POWER COMPANY

PROJECT MOUNTAINEER PLANT

BORING NO. B0502 DATE 8/24/05 SHEET 3 OF 9

BORING START 1/4/05 BORING FINISH 6/23/05

| SAMPLE NUMBER | SAMPLE | SAMPLE DEPTH IN FEET | | STANDARD PENETRATION RESISTANCE BLOWS / 6" | TOTAL LENGTH RECOVERY | RQD % | DEPTH IN FEET | GRAPHIC LOG | USCS | SOIL / ROCK IDENTIFICATION | WELL | DRILLER'S NOTES |
|---------------|--------|----------------------|------|--|-----------------------|-------|---------------|-------------|------|---|------|-----------------|
| | | | | | | | | | | SHALE | | |
| | | | | | | | | | | | | |
| 25 | NQ2 | 65.7 | 75.7 | | 10.0 | 100 | | | | | | |
| 26 | NQ2 | 75.7 | 85.7 | | 10.0 | 100 | | | | 5B 7/1 LIGHT BLUISH GRAY FINE to MEDIUM GRAIN SANDSTONE | | |
| 27 | NQ2 | 85.7 | 95.7 | | 10.0 | 100 | | | | | | |

AMERICAN ELECTRIC POWER SERVICE CORPORATION
AEP CIVIL ENGINEERING LABORATORY
LOG OF BORING



JOB NUMBER

COMPANY APPALACHIAN POWER COMPANY

PROJECT MOUNTAINEER PLANT

BORING NO. B0502 DATE 8/24/05 SHEET 4 OF 9

DATE 8/24/05

SHEET 4

9

| SAMPLE NUMBER | SAMPLE | SAMPLE DEPTH IN FEET | | STANDARD PENETRATION RESISTANCE BLOWS / 6" | TOTAL LENGTH RECOVERY | RQD % | DEPTH IN FEET | GRAPHIC LOG | USCS | SOIL / ROCK IDENTIFICATION | WELL | DRILLER'S NOTES |
|---------------|--------|----------------------|-------|--|-----------------------|-------|---------------|-------------|------|---|------|-----------------|
| | | | | | | | | | | 5B 5/1 MEDIUM BLUISH GRAY CLAY SHALE Area w/ numerous calcite deposits @ 92-93.6' | | |
| 28 | NQ2 | 95.7 | 105.7 | | 10.0 | 91 | | | | 5B 7/1 LIGHT BLUISH GRAY FINE to MEDIUM GRAIN SANDSTONE | | |
| 29 | NQ2 | 105.7 | 115.7 | | 10.0 | 100 | | | | 5B 5/1 MEDIUM BLUISH GRAY CLAY SHALE 5B 7/1 LIGHT BLUISH GRAY FINE to MEDIUM GRAIN SANDSTONE | | |
| 30 | NQ2 | 115.7 | 125.7 | | 10.0 | 100 | | | | 5B 7/1 LIGHT BLUISH GRAY COARSE GRAIN SANDSTONE w/ cross bedding throughout | | |

**AMERICAN ELECTRIC POWER SERVICE CORPORATION
AEP CIVIL ENGINEERING LABORATORY
LOG OF BORING**



JOB NUMBER

COMPANY APPALACHIAN POWER COMPANY

PROJECT MOUNTAINEER PLANT

BORING NO. B0502 DATE 8/24/05 SHEET 5 OF 9

DATE 8/24/05

SHEET 5 OF 9

PROJECT MOUNTAINEER PLANT **BORING START 1/4/05** **BORING FINISH 6/23/05**

| SAMPLE NUMBER | SAMPLE | SAMPLE DEPTH IN FEET | | STANDARD PENETRATION RESISTANCE BLOWS / 6" | TOTAL LENGTH RECOVERY | RQD % | DEPTH IN FEET | GRAPHIC LOG | USCS | SOIL / ROCK IDENTIFICATION | WELL | DRILLER'S NOTES |
|---------------|--------|----------------------|-------|--|-----------------------|-------|---------------|-------------|------|----------------------------|------|-----------------|
| | | FROM | TO | | | | | | | | | |
| 31 | NQ2 | 125.7 | 135.7 | | 10.0 | 85 | 125 | | | | | |
| 32 | NQ2 | 135.7 | 145.7 | | 10.0 | 97 | 130 | | | | | |
| 33 | NQ2 | 145.7 | 155.7 | | 10.0 | 83 | 135 | | | | | |
| | | | | | | | 140 | | | | | |
| | | | | | | | 145 | | | | | |
| | | | | | | | 150 | | | | | |
| | | | | | | | | | | COAL | | |

AMERICAN ELECTRIC POWER SERVICE CORPORATION
AEP CIVIL ENGINEERING LABORATORY
LOG OF BORING



JOB NUMBER _____

COMPANY APPALACHIAN POWER COMPANY

PROJECT MOUNTAINEER PLANT

BORING NO. B0502 DATE 8/24/05 SHEET 6 OF 9

BORING START 1/4/05 BORING FINISH 6/23/05

| SAMPLE NUMBER | SAMPLE | SAMPLE DEPTH IN FEET | | STANDARD PENETRATION RESISTANCE BLOWS / 6" | TOTAL LENGTH RECOVERY | RQD % | DEPTH IN FEET | GRAPHIC LOG | USCS | SOIL / ROCK IDENTIFICATION | WELL | DRILLER'S NOTES |
|---------------|--------|----------------------|--|--|-----------------------|-------|---------------|-------------|------|---|------|--|
| 34 | NQ2 | 155.7 | | | | 10.0 | | 100 | | N4 MEDIUM DARK GRAY CLAY SHALE | | |
| 35 | NQ2 | 165.7 | | | | 10.0 | | 84 | | 5B 5/1 MEDIUM BLUISH GRAY CLAY SHALE | | |
| 36 | NQ2 | 175.7 | | | | 7.5 | | 91 | | 5G 4/1 DARK GREENISH GRAY CLAY SHALE | | |
| 37 | NQ2 | 183.2 | | | | 2.2 | | 64 | | 5B 5/1 MEDIUM BLUISH GRAY CLAY SHALE Fracture @ 184.2' | | Flushed boring with approx. 1000 gallons of water when boring stopped @ 183.2' on 1/12/05. SWL @ 8.8' on 6/22/05 with NQ hole to 183.2'. Hole open to 175'. Deconned rig & tools on 6/21/05 with water |
| 38 | NQ2 | 185.2 | | | | 3.9 | | 85 | | | | |

Continued Next Page

AMERICAN ELECTRIC POWER SERVICE CORPORATION
AEP CIVIL ENGINEERING LABORATORY
LOG OF BORING



JOB NUMBER _____

COMPANY APPALACHIAN POWER COMPANY

PROJECT MOUNTAINEER PLANT

BORING NO. B0502 DATE 8/24/05 SHEET 7 OF 9

BORING START 1/4/05 BORING FINISH 6/23/05

| SAMPLE NUMBER | SAMPLE | SAMPLE DEPTH IN FEET | | STANDARD PENETRATION RESISTANCE BLOWS / 6" | TOTAL LENGTH RECOVERY | RQD | DEPTH IN FEET | GRAPHIC LOG | USCS | SOIL / ROCK IDENTIFICATION | WELL | DRILLER'S NOTES |
|---------------|--------|----------------------|-------|--|-----------------------|-----|---------------|-------------|------|---|------|--|
| | | FROM | TO | | | | | | | | | and liqui-nox. Resumed drilling on 6/22/05 |
| 39 | NQ2 | 191.2 | 200.2 | | 9.2 | 78 | 190 | | | Fracture @ 189.7' | | Picked up 0.2' of core from previous run. |
| 40 | NQ2 | 200.2 | 210.2 | | 9.8 | 76 | 195 | | | Soft area @ 196.1' to 196.9' | | |
| 41 | NQ2 | 210.2 | 220.2 | | 10 | 96 | 200 | | | 5B 5/1 MEDIUM BLUISH GRAY CLAY SHALE w/ 5R 4/2 GRAYISH RED LENSES | | |
| | | | | | | | 205 | | | Fracture @ 203.1' | | |
| | | | | | | | 210 | | | 5B 5/1 MEDIUM BLUISH GRAY SILTY CLAY SHALE Hard | | |
| | | | | | | | 215 | | | 5B 5/1 MEDIUM BLUISH GRAY SILTY FINE GRAIN SANDSTONE | | |

Continued Next Page

AMERICAN ELECTRIC POWER SERVICE CORPORATION
AEP CIVIL ENGINEERING LABORATORY
LOG OF BORING



JOB NUMBER _____

COMPANY APPALACHIAN POWER COMPANY

PROJECT MOUNTAINEER PLANT

BORING NO. B0502 DATE 8/24/05 SHEET 8 OF 9

BORING START 1/4/05 BORING FINISH 6/23/05

| SAMPLE NUMBER | SAMPLE | SAMPLE DEPTH IN FEET | | STANDARD PENETRATION RESISTANCE BLOWS / 6" | TOTAL LENGTH RECOVERY | RQD % | DEPTH IN FEET | GRAPHIC LOG | USCS | SOIL / ROCK IDENTIFICATION | WELL | DRILLER'S NOTES |
|---------------|--------|----------------------|-------|--|-----------------------|-------|---------------|-------------|------|--|------|--|
| 42 | NQ2 | 220.2 | 230.2 | | | 9.7 | 93 | | | Soft area @ 224.3' 5B 5/1 MEDIUM BLUISH GRAY CLAY SHALE Hard | | |
| 43 | NQ2 | 230.2 | 240.2 | | | 10.1 | 70 | | | 5B 5/1 MEDIUM BLUISH GRAY SILTY CLAY SHALE Hard Soft area @ 232.0' | | Picked up 0.1' of core from previous run. |
| 44 | NQ2 | 240.2 | 250.2 | | | 9.9 | 96 | | | 5B 5/1 MEDIUM BLUISH GRAY CLAY SHALE Hard 5B 7/1 LIGHT BLUISH GRAY MEDIUM GRAIN SANDSTONE w/ COAL STREAKS THROUGHOUT | | |
| | | | | | | | | | | CLAY SHALE AREA @ 248.3 - 248.4' 5B 7/1 LIGHT BLUISH GRAY MEDIUM GRAIN SANDSTONE w/ COAL STREAKS THROUGHOUT | | Stopped boring @ 250.2' on 6/23/05. Flushed boring with approx. 700 gallons |

Continued Next Page

AMERICAN ELECTRIC POWER SERVICE CORPORATION
AEP CIVIL ENGINEERING LABORATORY
LOG OF BORING



JOB NUMBER _____

COMPANY APPALACHIAN POWER COMPANY

PROJECT MOUNTAINEER PLANT

BORING NO. B0502 DATE 8/24/05 SHEET 9 OF 9

BORING START 1/4/05 BORING FINISH 6/23/05

| SAMPLE NUMBER | SAMPLE | SAMPLE DEPTH IN FEET | | STANDARD PENETRATION RESISTANCE BLOWS / 6" | TOTAL LENGTH RECOVERY | RQD % | DEPTH IN FEET | GRAPHIC LOG | USCS | SOIL / ROCK IDENTIFICATION | WELL | DRILLER'S NOTES |
|---------------|--------|----------------------|----|--|-----------------------|-------|---------------|-------------|------|----------------------------|------|---|
| | | FROM | TO | | | | | | | | | of water. Boring was geo-physical logged on 6/29/05. Installation of 1" geomon well (MW-42) will be done at a later date. |