

2021 ANNUAL GROUNDWATER MONITORING AND

CORRECTIVE ACTION REPORT

FOR EAST ASH POND

CTI DEVELOPMENT LLC WOOD RIVER SITE/ FORMER WOOD RIVER POWER PLANT 1 CHESSEN LANE ALTON, ILLINOIS 62202

Prepared For:

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1.0 INTRODUCTION

In accordance with Illinois JCAR Administrative Code requirements under Illinois Title 35, Subtitle G, Chapter I, Subchapter J - Part 845.610(e), Gemini Engineering LLC (Gemini) has prepared this report on behalf of CTI Development LLC (CTI) for the 2021 Wood River East Ash Pond in Alton, Illinois. CTI took possession of the power station property on August 30, 2019 from Luminant/Dynegy Midwest Generation, LLC (DMG).

The owner or operator of an existing Coal Combustion Residuals (CCR) unit shall prepare an annual groundwater monitoring and corrective action report, for the preceding calendar year, that documents the status of the groundwater monitoring and corrective action program for the CCR unit. The report should summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and key activities for the upcoming year per Part 845.610(e). The annual report will minimally cover the following site-specific information:

- 1. A drawing or diagram showing the CCR unit, the designated background (or upgradient) monitoring wells, and the designated downgradient monitoring wells.
- 2. Identification and discussion of any monitoring wells that were installed or decommissioned during the preceding year.
- 3. A Potentiometric surface map for groundwater elevations at the time of each sampling event.
- 4. Provide a summary of groundwater samples taken for the West Ash Pond Complex, including the number of groundwater samples collected for analysis at each of the designated background and downgradient wells, the dates collected, whether the sample was required by the detection monitoring or assessment monitoring programs, and the groundwater monitoring data.
- 5. A discussion of the groundwater monitoring program including:
 - a. Statistical analysis of groundwater data to identify constituents detected at a statistically significant increase over background levels.
 - b. The transition from detection groundwater monitoring to assessment monitoring of constituents identified in the statistical assessment.
- 6. Other information required to be included in the annual report as specified in Part 845.610(e).



2.0 MONITORING & CORRECTIVE ACTION PROGRAM STATUS

As referenced in the 2018 Annual Groundwater Monitoring and Corrective Action Report (NRT/OGB 2019), the Primary East Ash Pond has been in an Assessment Monitoring Program in accordance with 40 CFR 257.94(e)(2). DMG placed the required notification on April 9, 2019.

Assessment monitoring sampling was continued in 2021 during the semi-annual sampling events under the direction of CTI and Gemini. Samples were collected from each of the West Ash Pond Complex designated upgradient and downgradient wells and analyzed for the Appendix III and Appendix IV parameters. The analytical data was evaluated in accordance with the Statistical Analysis Plan (NRT/OBG 2017) provisions to determine if any statistically significant increases (SSIs) of the Appendix III parameters were above the background concentrations and if statistically significant levels (SSLs) of Appendix IV parameters were above the Groundwater Protections Standards (GWPSs).

The East Ash Pond was continued to be sampled on a semi-annual schedule as outlined with the Groundwater Monitoring Plan (NRT/OBG Oct. 2016). Semi-annual sampling events were completed by Teklab Inc. on the following dates during 2021:

Q1-Q2	Q3-Q4
Sample Date	Sample Date
2/22/2021	8/26/2021

Assessment Monitoring Program Summary November 2017 – August 2021

Well	Appendix III - SSIs		Appendix IV – SSLs									
ID	Trend	UCL Value	Trend	UCL Value								
	Only Boron with an	Only Boron Above	Decreasing Trend	Molybdenum								
	Increasing Trend;	Background	for Molybdenum;	UCL Above								
38	All Other Trend are		All Other Trend are	GWPS								
	Statistically		Statistically									
	Insignificant		Insignificant									



	Boron, Calcium,	Boron, Calcium,	None	Molybdenum
			NUTE	-
	Sulfate, & TDS	Sulfate, & TDS		UCL Above
	with a Decreasing	Above Background		GWPS
39S	Trend; All Others			
	are No Trend or			
	Statistically			
	Insignificant			
	All Constituents are	Boron, Calcium,	None	Lithium UCL
	No Trend or	Sulfate, & TDS		Below &
40S	Statistically	Above Background		Molybdenum
	Insignificant			UCL Above
				GWPS
	Boron & Calcium	Boron, Calcium,	None	Lithium UCL
	with an Increasing	Sulfate, & TDS		Above GWPS
41	Trend; All Other	Above Background		
41	Trends are			
	Statistically			
	Insignificant			

The Statistical Background Values for the SSIs evaluation from Appendix III are summarized in Table A. The GWPSs for the SSLs evaluation from Appendix IV are summarized in Table B.

Table A - Statistical Background Values

Parameter	Statistical Background Value
Арре	ndix III
Boron (mg/L)	1.22
Calcium (mg/L	180.516
Chloride (mg/L)	88
Fluoride (mg/L)	0.76
pH (S.U.)	6.61 / 7.23
Sulfate (mg/L)	203
TDS (mg/L)	863

Notes:

mg/L = milligrams per liter

S.U. = Standard Units

TDS = Total Dissolved Solids



Standard
ndix IV
0.006
0.010
2
0.004
0.005
0.10
0.006
4
0.015
0.171
0.002
0.10
0.05
0.002
5

Table B - Groundwater Protection Standards

Notes:

mg/L = milligrams per liter

pCi/L = picoCuries per liter

3.0 **ACTIONS COMPLETED IN 2021**

As previously noted, a quarterly groundwater sampling event was completed for the West Ash Pond Complex in 2021 under the Assessment Monitoring Program. A summary of the analytical data and statistical analyses are found in Appendix B - Tables 1 and 2.

Appendix A - Figure 1 displays the designated groundwater well system for the West Ash Pond Complex.

4.0 **PROBLEMS ENCOUNTERED & CORRECTIVE ACTIONS**

Performance and assessment of the designated groundwater well system for the East Ash Pond encountered no issues during 2021. Guidelines in the Sampling and Analysis Plan (NRT/OGB, 2017) were followed during the collection and analysis of the representative samples.



5.0 2022 PLANNED ACTIONS

The following actions are planned for 2022:

- The continuation of Assessment Monitoring Program of the East Ash Pond with semi-annual sampling events.
- The continuation of statistical evaluation of the collected analytical data from the designated groundwater well system to determine if any SSLs for Appendix IV parameters has occurred.
- If an SSL has been identified, an assessment of "potential alternative sources" will be completed. A "potential alternative source" is one other than the referenced CCR unit that could have caused the SSL or the SSL resulted from an error in one of the following processes: sample collection, sample analysis, statistical evaluation, or a possible variation/change in the groundwater systems quality.
 - If an alternative source is causing the SSL, a documented demonstration will be completed within 90 days after the SSL discovery and included in the Groundwater Monitoring and Corrective Action report for that year.
 - If an alternative source is <u>not</u> the cause of the SSL, the procedure and requirements in 40 CFR 257.94 - 257.98 as applicable will be met. This also includes completion of the appropriate notifications required by 40 CFR 257.105 - 257.108.

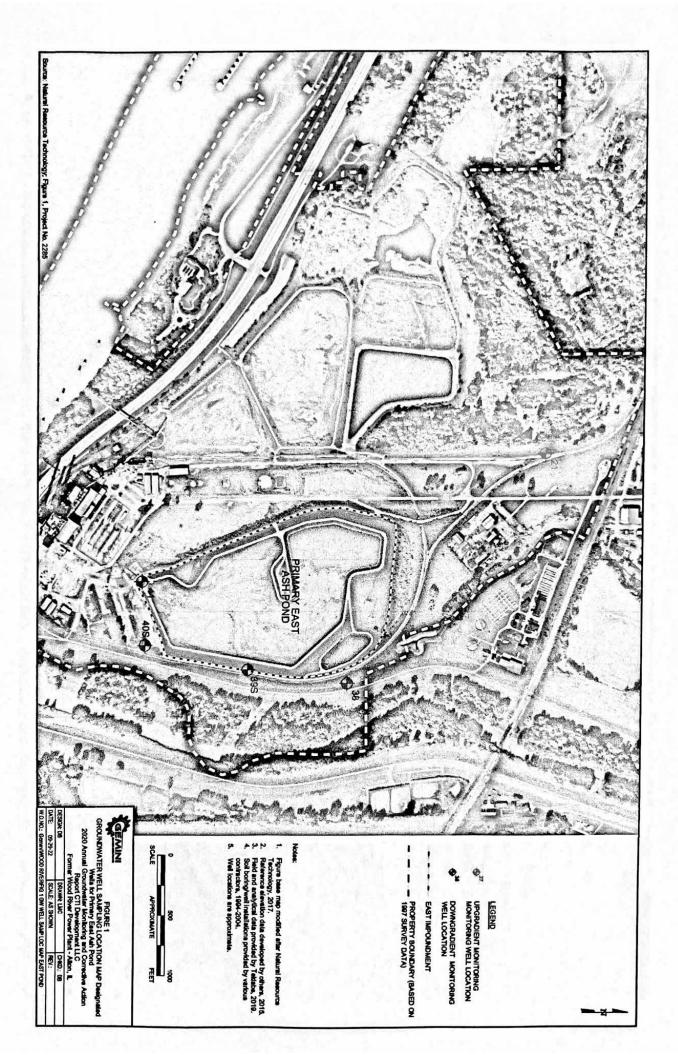
6.0 **REFERENCES**

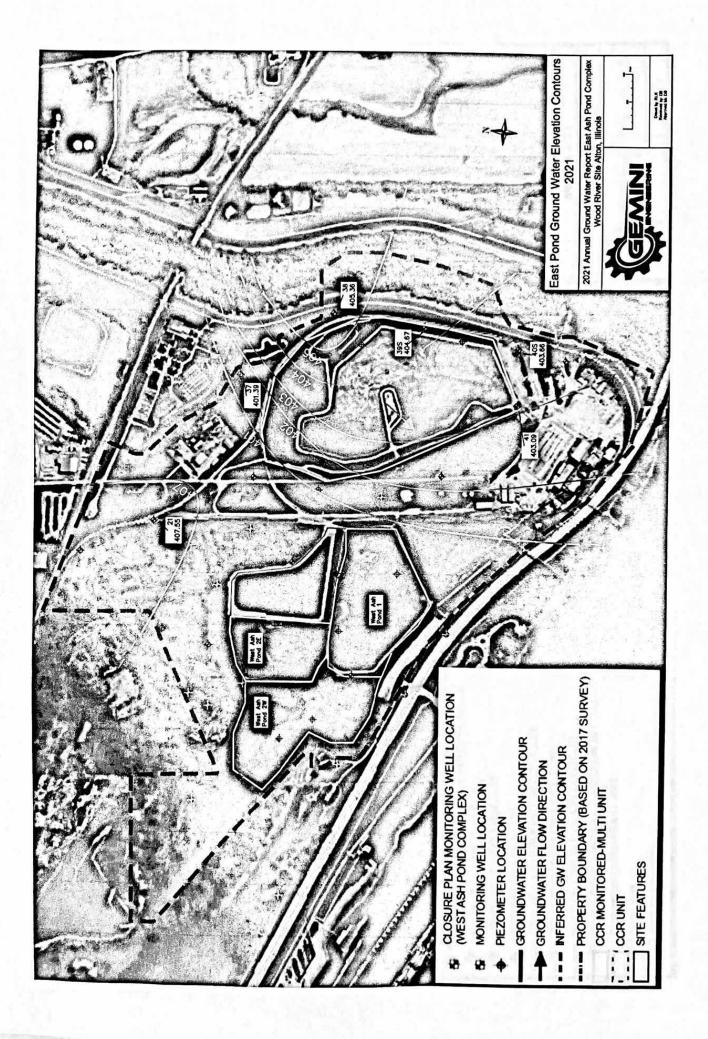
AECOM, November 28, 2016. Closure and Post-Closure Care Plan for the Wood River West Ash Complex at Dynegy Midwest Generation, LLC., Wood River Power Station.

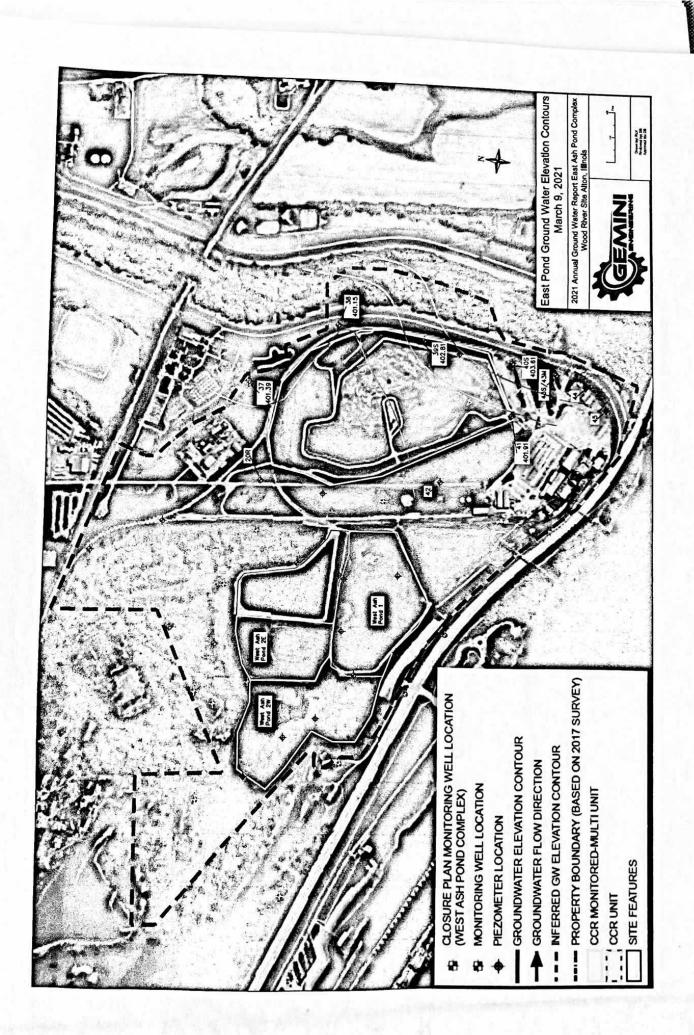
Natural Resource Technology, Inc. (NRT), October 19, 2016. Groundwater Monitoring Plan, West Ash Pond Complex, Wood River Power Station, Alton, Illinois.

USEPA, April 17, 2015. 40 CFR Parts 257 and 261. Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule

APPENDIX A FIGURES







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TABLE 1 Summary of Analytical Analyses - Appendix III East Ash Pond

Sample Location	Date Sampled	Boron (mg/L)	Calcium (mg/L)	Chloride (mg/L)	Fluoride (mg/L)	pH (S.U.)	Sulfate (mg/L)	TDS (mg/l
	ckground values	1.22	180.516	88	0.76	6.61 / 7.23	203	863
ackground	d / Upgradient Mo	Statement and the Real Property lies and the rea	11111111	140.014	TITUTE	ILLINE.		1.1.1
1.1.1	5/2/2018	0.397	128	5	0.18	6.4	69	456
	7/31/2018	0.33	106	<5	0.18	6.90	57	448
	2/18/2019	0.42	117	4	0.19	6.95	63	470
	9/19/2019	0.17	95	2	0.20	6.79	40	394
	2/6/2020	0.31	117	4	0.18	7.02	63	474
2.19	2/6/2020 (Dup)	0.31	117	4	0.17	7.02	63	452
21	8/12/2020	0.21	105	1	0.18	6.92	42	382
hik	8/12/2020 (Dup)	0.264	105	1	0.19	6.92	43	380
le ul i	2/22/2021	0.342	120	2	0.2	7.05	68	466
Sec.	2/22/2021 (Dup)	0.4	116	2	0.2	7.05	70	452
11.17	9/06/0001	0.245	102	2	0.19	7.74	47	418
1111	8/26/2021 8/26/21 Dup	0.245	103	9	0.19	7.74	53	440
and the second	5/2/2018	0.618	134	45	0.54	6.5	99	644
	7/31/2018	0.48	163	11	0.50	6.70	69	528
1111	2/18/2019	0.48	129	6	0.44	6.17	50	524
C. Land	9/19/2019	0.41	136	6	0.39	6.56	56	548
37	2/6/2020	0.45	156	10	0.34	6.86	90	588
	8/12/2020	0.43	154	4	0.35	6.94	66	514
1.11	2/22/2021	0.55	180	40	0.36	6.89	108	674
1.5	8/23/2021	0.679	160	59	0.35	6.7	94	638
owngradie	ent Monitoring We	ells	TTTTT			114111	LI GALLA	1011 24
1.1.1.3	11/2/2017	1.18	69	44	<0.1	7.6	80	384
	5/2/2018	3.12	94	43	0.30	6.70	130	500
1.1.1	7/31/2018	2.69	102	45	0.31	7.20	94	438
4-67	2/18/2019	3.08	103	44	0.31	6.57	105	508
38	9/19/2019	3.12	92	38	0.33	7.20	94	472
	2/6/2020	3.41	98	42	0.30	7.37	111	472
	8/12/2020	3.88	106	50	0.32	7.50	124	440 484
	2/22/2021	2.83	109	50	0.42	7.5	126	530
Articles	8/26/2021	3.07	112	50	0.44	7.5	481	1050
	11/2/2017	59.40	212	<5		6.50	515	1080
	5/2/2018	51.20	241	5	0.46	6.80	509.00	1150
	7/31/2018	61.10	344	<5	0.40	6.45	434	1080
	2/18/2019	61.00	222 210	3	0.46	6.63	333	984
395	9/19/2019	55.20	216	3	0.50	6.92	416.00	906
	2/6/2020	53.60	199	2	0.64	7.23	395	850
	8/12/2020 2/22/2021	52.80 45.9	199	2	0.58	7.21	360	854
	8/26/2021	48	179	2	0.51	6.81	366	830
		25.10	236	10	0.14	7.6	548	1,040
	11/3/2017 5/2/2018	18.80	259	14	0.20	6.30	408	1,140
	7/31/2018	27.30	360	10	0.10	7.10	604	1,210
	2/18/2019	27.40	250	13	0.11	6.73	470	1,050
40S	9/19/2019	24.80	247.0	13	0.13	6.89	513	1,050
	2/6/2020	24.70	292	15	0.12	7.07	658	1,140
	8/12/2020	23.50	264	15	0.13	7.38	517	1,040
	2/22/2021	16.4	232	16	0.14	7.04	464	1040
1.1.6	8/26/2021	33	328	14	0.15	7.06	636	1210
faller der	11/3/2017	8.07	293	18	0.15	7.5	642	1,340
	5/2/2018	10.40	324	12	0.14	6.30	940	1,620
	7/31/2018	10.10	441	22	0.14	7.00	1000.00	1,800
	2/18/2019	11.10	349	17	0.14	6.98	847.00	1,670
41	9/19/2019	13.70	415	15	0.14	6.74	892	1,820
	2/6/2020	12.60	384	16	0.13	6.98	858.00	1,830
	8/12/2020	13.00	473	17	0.14	7.09	1130 987	1,830
	2/22/2021	8.52	377	19	0.14	7.92	30/	1920

Γ							I				405	;							SAE	1							8		Contraction of the			Downgradient I				37									21	2					Dackground -	Backmound / L	Location	Sample
8/26/2021	2/22/2021	8/12/2020	2/6/2020	9/19/2019	2/18/2019	7/31/2018	S/2/2018	ROG/2021	0202010	R/12/2020	2/6/2020	9/19/2019	2/18/2019	7/31/2018	5/2/2018	8/26/2021	2/22/2021	8/12/2020	2/6/2020	8/19/2019	2/18/2019	7/31/2018	5/2/2018	8/26/2021	2/22/2021	8/12/2020	2/6/2020	8/18/2018	2/18/2019	7/31/2018	5/2/2018	Downgradient Monitoring Wells	8/23/2021	2/22/2021	8/12/2020	2/6/2020	8/19/2019	2/18/2019	7/31/2018	0/0/1 12/0/0	8/26/2021	2/22/2021 (Dup)	2/22/2021	8/12/2020 (Dup)	8/12/2020	2/6/2020 (Dup)	2/6/2020	9/19/2019	2/18/2019	7/1/2018	5/2/2018	Background / Upgradient Monitoring Wells		Date Sampled
<0.001	<0.001	<0.001	<0.001	40.001	40.001	0.001	0.001	0.00	0.90	0.00	0.00	0.00	0.00	0.00	0.00	40.001	40.001	<0.001	40.001	0.00	0.00	<0.001	<0.001	<0.001	40.001	<0.001	<0.001	40.001	<0.001	<0.001	<0.001		0.0009	40.001	40.001	40.001	40.001	100 05	40.001	CUUU	40.001	0.0007	0.0005	<0.001	<0.001	<0.001	40 001	40.001	0.00		0.001	Wells	(mg/L)	Sb, total
0.0005	<0.001	<0.001	<0.001	<0.001	<0.001	40.001	0.001	100.00	0.000	0.003	0.003	0.002	0.001	0.001	0.001	0.0014	0.00	0.00	0.00	0.00	0.00	0.00	0.00	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001		<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	0.0021	200.0	0.0021	0.0019	0.0019	0.00	0.00	0.00	0.00	0.00	000	0.00	0.0074	110/1	As, total
0.0251	0.030	0.023	0.022	0.024	0.029	0.023	0.00	0.000	0.070	0.070	0.076	0.061	0.067	0.113	0.104	0.0332	0.03	0.03	0.04	0.04	0.03	0.05	0.03	0.157	0.14	0.16	0.15	0.15	0.17	0.17	0.15	A STATE OF A	0.108	0.10	0.10	0.10	0.09	0.09	0.12	0.109	0.181	0.231	0.207	0.215	0.22	0.30	0.30	0.20	0.18	0 18	0.20	-	(100/1)	Ba, total
<0.001	<0.001	<0.001	<0.001	<0.001	40.001	NA	-0.001	0.001	10.001	10.001	<0.001	<0.001	<0.001	NA	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	NA	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	NA	<0.001		<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	NA	A0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	NA	<0.001	0.004	(ing/L)	Be, total
<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	-0.001	0.00	0.00	0.00	0.00	0.00	0.00	0.00	<0.001	0.0	0.0004	0.00	0.00	0.00	0.00	0.00	<0.001	0.0	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001		<0.001	<0.001	0.00	<0.001	0.00	<0.001	<0.001	A0.001	20002	.0004	.0005	<0.001	0.00	0.00	0.00	<0.001	<0.001	40.001	0.0	0.000	(mg/L)	Cd, total
<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	0.00	NA	-0 0015	00015	00015	<0.0015	<0.0015	<0.0015	0.00	NA	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	0.00	NA	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	NA	<0.0015		<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	NA	20.0010	<0.0015	<0.0015	<0.0015	0.0013	0.00	<0.0015	<0.0015	0.00	0.00	NA	<0.0015	0.1	Impul	Cr, total
<0.001	<0.001	40.001	0.000	0.000	0.000	A 001	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.002	0.0011	0.001	0.001	0.001	0.002	0.001	0.001	0.001	<0.001	<0.001	<0.001	0.00	0.00	0.00	<0.001	<0.001		<0.001	<0.001	<0.001	<0.001	0.00	0.00	<0.001	0.0001	0.0002	0.0014	0.0009	<0.001	0.00	0.00	0.00	0.00	0.00	0.001	0.00	0.000	(Ing/L)	Co, total
0.13	0.14	0.14	0.13	0.14	0.14	0.14	014	0 15	014	0 13	0.12	0.13	0.11	0.10	0.20	0.51	0.58	0.64	0.5	0.46	0.41	0.4	0.48	0.44	0.42	0.32	0.30	0.33	0.31	0.31	0.30		0.35	0.35	0.35	0.34	0.39	0.44	0.5	0.10	0.19	0.2	0.2	0.19	0.18	0.17	0.18	0.2	0.19	0.18	0.18	4	(mg/L)	F, total
<0.001	<0.001	<0.001	<0.001	<0.001	0.0002	NA	<0.001	40.001	0.001	<0.001	<0.001	<0.001	<0.001	NA	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	NA	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	NA	<0.001		<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	NA	10001	100.02	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	NA	<0.001	0.010	(Ing/L)	Pb, total
0.042	0.0377	0.0503	0.0429	0.0441	0.0385	0.0366	0.0288	0.0364	0.0159	0.0228	0.0304	0.0272	0.0335	0.0599	0.026	0.008	0.0091	0.0103	0.012	0.0106	0.0135	0.0129	0.0138	0.0141	0.0143	0.017	0.0153	0.0149	0.0161	0.0135	0.0135		0.0349	0.0316	0.0333	0.0346	0.0281	0.0276	0.0251	0.0015	9800.0	0.01	0.0093	0.0089	0.0095	0.0101	0.0105	0.0081	0.0111	£600 0	0.0117	V.171	(110/1)	Li, total
<0.0002	40.0002	<0.0002	<0.0002	<0.0002	40.0002	<0.0002	40.0002	40.0002	40.0002	<0.0002	40.0002	<0.0002	<0.0002	<0.0002	0.00025	<0.0002	<0.0002	40.0002	<0.0002	<0.0002	<0.0002	<0.0002	40.0002	40.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002		<0.0002	<0.0002	<0.0002	<0.0002	40.0002	<0.0002	40.0002	2000	40.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	40 0002	40.0002	<0.0002	U.UUE	(mgr)	Hg. total
0.031	0.0272	0.0353	0.0353	0.0313	0.0361	0.0506	0.036	0.154	0.135	0.0765	0,157	0.162	0.189	0.195	0.0925	1.02	0.966	1.4	1.11	0.704	0.732	1.05	0.931	0.0746	0.0628	0.119	0.112	0.116	0.105	0.128	0.076	A STATE OF THE STA	0.0013	0.0016	0.0025	0.0017	0.0023	0.0025	0.0034	0.034	<1.0	0.0006	0.0007	<1.5	<1.5	0.6	<1.5	<0.0015	0.0007	<0.0015	0.0015	0.1	(mg/L)	Mo, lotal
3	NA	NA	2	0.37	0.57	0.00	0.43	A	N	¥	۵	0.52	0.55	0.56	0.88	NA	NA	NA	~	0.26	0.39	0.07	1.9	NA	N	NA	2	0.7	0.5	0.53	1.23		NA	NA	NN	<0.002	0.14	0.42	0.00	170	N	NA	NA	NA	×	N	2	0.25	0.39	017	1.5	0	(DCML)	
40.001	40.001	40.001	40.001	0.0011	0.0013	0.002	0.001	0.0126	0.0125	0.0008	0.0018	0.0071	0.004	0.0062	0.0039	40.001	40.001	<0.001	40.001	40.001	40.001	<0.001	<0.001	40.001	40.001	40.001	40.001	40.001	40.001	40.001	40.001		40.001	40.001	40.001	0.0006	40.001	40.001	40.001	0.001	80000	0.0049	0.0043	0.0017	0.0018	0.0009	0.0012	0.0021	0.0008		0.0021	0.00	(mg/c)	Se, total
0.0011	40.002	40.002	40.002	40.002	40.002	¥	40.002	0.0031	40.002	40.002	40.002	40.002	40.002	X	40.002	40.002	40.002	40.002	40.002	40.002	40.002	¥	40.002	40.002	40.002	40.002	40.002	40.002	40.002	3	40.002		<0.002	40 002	40.002	<0.002	40.002	40.002	¥	0.0013	40.002	40.002	40.002	A0.002	40.002	40.002	40 002	40 002	40.002		40 002	0.002	IMOVE	TI, Iotal

TABLE 2 Summary of Analytical Analyses - Appendix IV East Ash Pond