2025 Annual Groundwater Monitoring and Corrective Action Report

W.A Parish Generating Station
Thompsons, Texas

CCR RN 108

Solid Waste Disposal Area (SWMU 001)
CCR Multiunit Landfill
Air Preheater Pond (SWMU 021)
FDG Emergency Pond (SWMU 020)

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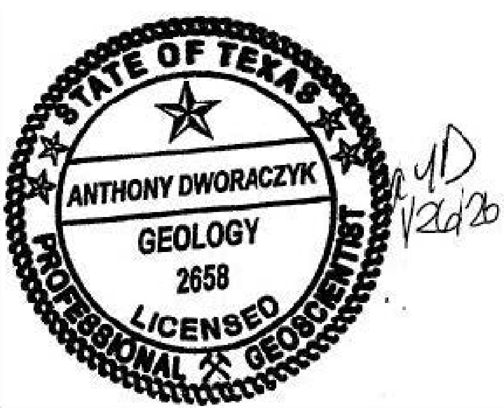

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Executive Summary

Pursuant to 30 Texas Administrative Code (30 TAC) Chapter 352, Coal Combustion Residuals Waste Management and Registration Program for Coal Combustion Residuals (CCR) Implementation (TCEQ's CCR Permit Program), the owner or operator of an existing CCR unit must prepare an annual groundwater monitoring and corrective action report (Annual Report) no later than January 31, 2026, addressing the preceding calendar year. The information to be provided in the Annual Report is described in Subsection 1.2 of the Texas Commission on Environmental Quality (TCEQ) Draft Technical Guidance No. 32, Coal Combustion Residuals Groundwater Monitoring and Corrective Action. In addition, at the request of TCEQ, this Annual Report provides the field and laboratory analytical results for three years of monitoring: 2023, 2024 and 2025.

TRC Environmental Corporation (TRC) has prepared the *2025 Annual Groundwater Monitoring and Corrective Action Report* (Annual Report) for the three CCR units at the W.A. Parish Electric Generating Station (Station):

- Solid Waste Disposal Area (SWDA, SWMU 001) CCR Multiunit Landfill;
- FGD Emergency Pond (E Pond, SWMU 020); and
- Air Preheater Pond (APH Pond, SWMU 021).

TRC has prepared this Annual Report on behalf of NRG Texas Power, LLC (NRG). This Annual Report also provides the following information:

- The groundwater monitoring systems for the CCR units operated under detection monitoring at the start and end of 2025; and
- Potentially statistically significant increases (SSIs) of Appendix III CCR constituents above background in groundwater and provides the alternative source demonstrations (ASDs) successfully completed during 2025.

In conclusion, this Annual Report contains the information required pursuant to 30 TAC §352.901 and 30 TAC §352.902 and TCEQ Draft Technical Guidance No. 32 of the TCEQ CCR Permit Program. In addition, at the request of TCEQ, this Annual Report provides the field and laboratory analytical results for three years of monitoring: 2023, 2024 and 2025. This information is provided in this Annual Report. No other information is required to be included in the Annual Report as specified in 30 TAC §352.971 and §352.981 of the TCEQ CCR Permit Program.

Based on the key activities performed during 2025, it is recommended that the three CCR units: SWDA CCR Multiunit Landfill, APH Pond, and the E Pond; remain in detection monitoring subject to the following key activities and that the following project timeline be implemented during 2026:

- The *2025 Annual Report* will be prepared and placed into the Station's Facility Operating Record (FOR) by January 31, 2026, submitted to the TCEQ within 30 days of placement in the FOR, and posted to the Station's publicly accessible CCR website by March 2, 2026,
- Both semi-annual groundwater detection monitoring events for the three CCR units will be performed during the first and second halves of 2026 (February and August) for the Appendix III detection monitoring parameters,

- As necessary, the first and second half 2026 resampling detection monitoring events for the CCR units will be performed within 30 days of the original monitoring events and samples will be reanalyzed for select Appendix III detection monitoring constituents,
- Groundwater potentiometric surface maps will be prepared for the first and second halves of 2026 semi-annual detection monitoring events,
- The flow rates and directions of groundwater flow will be determined for the first and second halves of 2026 semi-annual detection monitoring events,
- Statistical analysis and identification of potential SSIs will be performed for the first and second halves of 2026 semi-annual detection monitoring events,
- NRG will notify TCEQ, if required, if potential SSIs are identified and whether ASDs will be prepared for the first and second half of 2026 semi-annual detection monitoring events,
- Written ASDs will be prepared and submitted to TCEQ for review and approval, if required, to evaluate potential SSIs above background for the first and second halves of 2026 semi-annual detection monitoring events, and
- It is anticipated that the new landfill cell at the SWDA will be permitted by TCEQ and quarterly background monitoring for the associated monitoring wells will begin in 2026.

1.0 Introduction

1.1 CCR Program Summary

On June 28, 2021, the United States Environmental Protection Agency (USEPA) published the final approval of the TCEQ partial State Coal Combustion Residuals (CCR) Permit Program, which became effective on July 28, 2021. The TCEQ adopted by reference the Federal CCR Program (40 CFR Part 257) as amended through the July 30, 2018 issue of the Federal Register (83 FR 36435), subject to the changes and additions provided in the TCEQ CCR Permit Program. As stated in USEPA's approval of the TCEQ CCR Permit Program on June 28, 2021, the TCEQ CCR Permit Program now operates in lieu of the Federal CCR program. Therefore, during 2025, the three CCR units operated pursuant to the requirements of the TCEQ CCR Permit Program.

Pursuant to the TCEQ CCR Permit Program, no later than January 31 of each calendar year, the owner or operator must prepare an annual groundwater monitoring and corrective action report (Annual Report) for the CCR units addressing the preceding calendar year. At a minimum, per TCEQ Draft Technical Guidance No. 32, the Annual Report must contain:

- A map, aerial image, or diagram showing the CCR unit(s) and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit(s),
- Narrative description of the Facility and Unit Descriptions and groundwater monitoring system, monitoring well inspection,
- Hydrogeology (groundwater flow rate and direction) with potentiometric surface map,
- Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken,
- In addition to all the monitoring data, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs and laboratory reports,

- Statistical analysis and results,
- A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels); and other information required to be included in the annual report, as specified in 30 TAC §§352.971 and 352.981, and
- Summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, conclusions and recommendations, and project timelines and key activities for the upcoming year.

TRC Environmental Corporation (TRC) has prepared the *2025 Groundwater Monitoring and Corrective Action Report* (*Annual Report*) for the three CCR units located at the Station on behalf of NRG in accordance with 30 TAC §352.901 and 30 TAC §352.902 and TCEQ Draft Technical Guidance No. 32 of the TCEQ CCR Permit Program.

Pursuant to the TCEQ CCR Permit Program, NRG will comply with the recordkeeping requirements, the notification requirements, and will post the Annual Report to NRG's publicly accessible CCR Web site. In addition, pursuant to §352.902 of the TCEQ CCR Permit Program, NRG will submit the Annual Report to the TCEQ for review no later than 30 days after the report has been placed into the Station's FOR.

1.2 Corrective Measures and Corrective Action

Finally, since the three CCR units are not currently subject to corrective measures or correct action activities under the TCEQ CCR Permit Program, the provisions of 30 TAC §352.971 and §352.981 of the TCEQ CCR Permit Program do not apply. Therefore, per §352.901 of the TCEQ CCR Permit Program, no other information relative to corrective measures or corrective action must be provided in this Annual Report.

1.3 Station Overview

The Station is located in Thompsons, Texas (Figure 1-1). The Station is adjacent to Smithers Lake with the electricity generating portion located on the southeastern shore (location of the E Pond and the APH Pond) and the SWDA CCR Multiunit Landfill located along the northeastern shore (Figure 1-2). The Station currently uses western United States coal as a fuel source to power the boilers. The spent coal fuels or CCR have been classified by the TCEQ as a Class II Nonhazardous waste and consist of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge. During 2025, the Station had the following three active CCR Units per the TCEQ CCR Permit Program:

- SWDA CCR Multiunit Landfill (SWMU 001), which includes active Landfill cells: Cell 1C, Cell 2A, Cell 2B, and Landfill Cell 3; and inactive Landfill cells: Cell 1, Cell 1A and Cell 1B.
- E Pond (SWMU 020); and
- APH Pond (SWMU 021).

All four active landfill cells are constructed on native clay soils and are generally constructed with berms having vegetated exterior slopes. The inside slopes and crests of the berms are surfaced with stabilized CCR to control vegetation and to act as an erosion protection layer. CCR management and stormwater control activities performed at the active CCR landfill cells are described below:

- Landfill Cell 1C. Landfill Cell 1C receives nonmarketable CCR, which are trucked from the Station. Storm water is directed to the storm water collection pond in the western portion of Cell 1C, where it is then transferred to the Cell 3 storm water pond on an as-needed basis for discharge from this pond to Texas Pollutant Discharge Elimination System (TPDES) Outfall 004.
- Landfill Cell 2A. A pugmill operation for mixing and stabilizing CCR for disposal in other cells or for beneficial reuse outside the SWMU 001 Landfill CCR multiunit had been located at Cell 2A. Storm water is directed to the southwestern portion of Cell 2A, where it is then transferred to the Cell 3 storm water pond on an as needed basis for discharge from this pond to TPDES Outfall 004.
- Landfill Cell 2B. Landfill Cell 2B receives marketable CCR, which is trucked from the Station. Storm water is directed to the storm water collection pond in the southern portion of Cell 2B, where it is then transferred to the Cell 3 storm water pond on an as-needed basis for discharge from this pond to TPDES Outfall 004.
- Landfill Cell 3. Landfill Cell 3 receives bottom ash, which is trucked from the Station. Storm water is directed to the storm water collection pond in the western portion of Cell 3. In accordance with the facility's TPDES permit, water from the Cell 3 storm water pond is discharged through Outfall 004 to Smithers Lake on an as-needed basis.

A description of both CCR surface impoundments at the Station, including CCR management and stormwater control activities performed are described below:

- FGD Emergency Pond (E Pond, SWMU 020). The E Pond is located in the central portion of the Station as shown on Figure 1-2. The E Pond receives storm water runoff from the FGD dewatering area and blowdown from the FGD system. This impoundment may also receive the contents of an FGD process vessel when the FGD system is not in operation. Per §257.101(k) of the Federal CCR Rule, CCR was removed from the E Pond and the E Pond was decontaminated. The E Pond was then retrofitted with the installation of a bottom composite liner system during 2021.
- Air Preheater Pond (APH Pond, SWMU 021). The APH Pond is located in the southwestern portion of the Station as shown on Figure 1-2. The APH Pond receives effluent from air preheater wash and boiler cleaning wash, which consists of fly ash or economizer ash particles and water. Per §257.101(k) of the Federal CCR Rule and as per the TCEQ CCR Permit Program, CCR was removed from the APH Pond and the APH Pond was decontaminated during 2020. The APH Pond was then retrofitted with the installation of a bottom composite liner system during 2020 and 2021.

2.0 Groundwater Monitoring Systems and Hydrogeology

2.1 Groundwater Monitoring Systems

The groundwater monitoring systems for the three CCR units at the Station consist of a total of 25 wells installed into the uppermost aquifer, which are described in the subsections below. The locations and well identification numbers for the background (or upgradient) and downgradient groundwater monitoring wells that are part of the groundwater monitoring program are shown on the following figures:

- SWDA CCR Multiunit Landfill, Figure 2-1;
- E Pond, Figure 2-2; and
- APH Pond, Figure 2-3.

2.1.1 SWDA CCR Multiunit Landfill (SWMU 001)

The groundwater monitoring system for the SWDA CCR Multiunit Landfill consists of 14 monitoring wells screened into the uppermost aquifer (see Table 2-1 and Figure 2-1). Six monitoring wells are located hydraulically upgradient of the SWDA CCR Multiunit Landfill and monitor background quality in the uppermost aquifer. The remaining eight wells are located hydraulically downgradient of the SWDA CCR Multiunit Landfill and monitor the quality of groundwater in the uppermost aquifer passing beneath the waste boundary of the SWDA CCR Multiunit Landfill. The downgradient monitoring wells making up the CCR groundwater monitoring system were selected based on the direction of groundwater flow and using well-spacing consistent with the locations of the upgradient wells. The SWDA CCR Multiunit Landfill wells are provided in Table 2-1 below.

Table 2-1
SWDA CCR Multiunit Landfill Monitoring Well Network

Upgradient Wells	Downgradient Wells
MW-23R, MW-28D, MW-42, MW-43, MW-47, MW-48	MW-44, MW-46R, MW-50, MW-52, MW-54, MW-55R, MW-58, MW-65

No groundwater monitoring wells were installed or decommissioned as part of the CCR groundwater monitoring system for the SWDA CCR Multiunit Landfill during 2025.

2.1.2 E Pond (SWMU 020)

The groundwater monitoring system for the E Pond (SWMU 020) consists of five monitoring wells (MW-36, MW-37, MW-38R, MW-60, and MW-61R) screened into the uppermost aquifer (see Figure 2-2). Monitoring wells MW-36 and MW-60 are located hydraulically upgradient of the E Pond and monitor background quality in the uppermost aquifer. The remaining three wells (MW-37, MW-38R, and MW-61R) are located downgradient of the E Pond and monitor the quality of groundwater in the uppermost aquifer passing beneath the waste boundary of the E Pond.

MW-61R groundwater monitoring well was installed following decommissioning of MW-61 due to Zero Liquid Discharge (ZLD) construction impacting MW-61 in December 2024. MW-61R was incorporated into the CCR monitoring well system for the E Pond during 2025. No new groundwater monitoring wells were installed or decommissioned as part of the CCR groundwater monitoring system for the E Pond during 2025.

2.1.3 APH Pond (SWMU 021)

The groundwater monitoring system for the APH Pond (SWMU 021) consists of six monitoring wells (MW-39R, MW-40, MW-41, MW-62, MW-63, and MW-64). Monitoring wells MW-39R, MW-40, and MW-62 are located hydraulically upgradient of the APH Pond and monitors background quality in the uppermost aquifer. MW-41, MW-63, and MW-64 are located hydraulically downgradient of the APH Pond and monitor the quality of groundwater in the uppermost aquifer passing beneath the waste boundary of the APH Pond.

During 2018, groundwater potentiometric surface maps historically prepared for the 2015 through 2017 detection monitoring events were reviewed to re-evaluate the apparent directions of groundwater flow in the uppermost aquifer at the APH Pond. Based on this re-evaluation, the groundwater monitoring system for the APH Pond was revised and updated to more adequately reflect the apparent directions of groundwater flow observed since the groundwater monitoring system was originally installed and to more accurately represent the natural range of background groundwater quality. As part of this re-evaluation, MW-39R and MW-40 were re-designated as background upgradient monitoring wells.

No new groundwater monitoring wells were installed or decommissioned as part of the CCR groundwater monitoring system for the APH Pond during 2025.

2.2 Semi-Annual Detection Monitoring Sampling

Hydrologic Monitoring Inc. (HMI) performed the semi-annual detection monitoring events during the first and second half of 2025 per §352.941 of the TCEQ CCR Permit Program. HMI performed the monitoring activities under contract to TRC.

A total of five detection monitoring sampling events were performed during 2025. The first half 2025 semi-annual detection monitoring event was performed in February 2025 and a verification sampling event was performed during March 2025 to evaluate select parameters. A second verification sampling event was performed in April 2025, due to construction at the plant which limited access to wells during the March 2025 resampling event. The second half 2025 semi-annual detection monitoring event was performed during August 2025 and a verification resampling event was performed during September 2025 to evaluate select parameters.

2.2.1 Monitoring Well Inspection

Prior to sample collection, each well was visually inspected for conditions that could potentially affect the validity of the analytical results. The results of the inspection were documented on a Water Sample Log.

No deficiencies in well construction were noted during the five groundwater monitoring events performed during 2025.

2.2.2 Quarterly Background Detection Monitoring

Quarterly background groundwater quality detection monitoring was completed in April 2021 as part of developing a new background groundwater quality data set for the CCR unit (see *2019 Annual Report*). A total of eight quarterly background monitoring events were performed beginning in the third quarter of 2019 through the second quarter of 2021. The quarterly background samples were analyzed for both the Appendix III and Appendix IV Federal CCR Rule parameters. Wells sampled for the quarterly background detection monitoring events are as follows:

CCR Unit	Upgradient Wells	Downgradient Wells
SWDA Multiunit	MW-23R, MW-28D, MW-42, MW-43, MW-47, MW-48	MW 44, MW-46R, MW-50, MW-52, MW-54, MW-55R, MW-58, MW-65
E Pond	MW-36, MW-60	MW-37, MW-38R, MW-61R
APH Pond	MW-39R, MW-40, MW-62	MW-41, MW-63, MW-64

2.2.3 Semi-Annual Detection Monitoring

The Appendix III field and laboratory analytical data collected during the February 2025 and August 2025 semi-annual detection monitoring events were the eighth and ninth semi-annual detection monitoring events that used the new background water quality data set to identify potential SSIs for the Appendix III data.

2.2.4 Analytical Laboratory

During 2025, the semi-annual detection monitoring groundwater samples were analyzed by ALS Environmental (ALS) located in Houston, Texas, which is a TCEQ certified laboratory (TCEQ ID T104704231).

2.2.5 Laboratory and Field Analyses

The semi-annual groundwater detection monitoring samples were analyzed for the Appendix III CCR constituents pursuant to 30 TAC Chapter 352. Additionally, field parameters (pH, temperature, specific conductivity, and turbidity) were obtained for all monitoring wells during the five groundwater monitoring events performed during 2054.

Laboratory and field analytical data are provided in Appendices A and B. The semi-annual detection monitoring analytical data for 2023 through 2025 are summarized in Table 2-2.

2.3 Laboratory Data Quality Review

Upon receipt of the February and August 2025 groundwater monitoring analytical data from the analytical laboratory and the March, April and September 2025 resampling events, the data were evaluated for completeness, overall quality and usability, method-specified sample holding times, precision and accuracy, and potential sample contamination.

TRC concluded that the February, March, April, August and September laboratory analytical data, analyzed by ALS, were complete and usable for the purposes of the CCR quarterly background and semi-annual detection monitoring programs. Laboratory data quality review information is provided in Appendix C.

2.4 Groundwater Flow Direction, Gradient, and Rate

Static groundwater elevations were measured for each monitoring well at all three CCR units during the February and August 2025 detection monitoring events prior to sample collection. These measurements are provided in Table 2-1 for the three CCR units. Groundwater potentiometric surface maps were developed for the February and August detection monitoring events to evaluate groundwater flow directions. The potentiometric surface maps are provided as the following figures:

- SWDA CCR Multiunit Landfill. Figures 2-4, and 2-7;
- APH Pond. Figures 2-5, and 2-8; and
- E Pond. Figures 2-6, and 2-9.

Groundwater flow direction and gradient information for all three CCR units for the 2024 detection monitoring sampling events are provided below:

SWDA CCR Multiunit Landfill. Groundwater is typically encountered at depths ranging from 14.90 (MW-23R) to 29.24 (MW-50) feet below the top of casing (btoc) at the SWDA CCR Multiunit Landfill, with the overall direction of groundwater flow beneath and in the vicinity of the CCR unit to the northeast. The average calculated groundwater gradient ranged from 0.0011 ft/ft to 0.0016 ft/ft with an average groundwater flow velocity of 14 ft/yr.

E Pond. Groundwater is typically encountered at depths ranging from 6.21 (MW-60) to 12.55 (MW-37) feet btoc at the E Pond, with the overall direction of groundwater flow beneath and in the vicinity of the CCR unit to the west-southwest. The average calculated groundwater gradient ranged from 0.0046 ft/ft to 0.0051 ft/ft with an average groundwater flow velocity of 51 ft/yr.

APH Pond. Groundwater is typically encountered at depths ranging from 6.18 (MW-41) to 14.14 (MW-40) feet btoc at the APH Pond, with the overall direction of groundwater flow beneath and in the vicinity of the CCR unit to the south and southeast. The average calculated groundwater gradient ranged from 0.0019 ft/ft to 0.0020 ft/ft with an average groundwater flow velocity of 21 ft/yr.

2.5 Groundwater Sampling Methods

Following the static depth-to-groundwater measurement, each monitor well was purged via low-flow sampling methods using a peristaltic pump or bladder pump. During purging, field parameters (pH, specific conductivity, dissolved oxygen [DO], turbidity, oxidation/reduction potential [ORP], and temperature) were measured with a sealed flow-through cell. All field parameters, except turbidity is measured inside the cell. Turbidity is measured outside of the cell. The flow rate during sampling was maintained at the same rate at which purging was conducted, approximately 200 milliliters per minute (mL/min). Purging continued until a requisite volume is purged and parameters stabilized. Adequate purging with respect to groundwater chemistry is achieved when stability for at least three (3) consecutive measurements is as follows:

- pH ± 0.1 standard unit (SU)
- specific conductance within 3%
- turbidity within 10% for values greater than 10 nephelometric turbidity units (NTUs). If three (3) turbidity readings are less than 10 NTUs, the values are considered to be stabilized.
- DO within 0.2 milligrams/Liter (mg/L) or 10% saturation, whichever is greater
- ORP within 10 millivolts (mV)

Following purging activities, groundwater samples were collected from dedicated tubing into laboratory-supplied containers provided by the analytical laboratory. Following collection, each sample was labeled, recorded on a chain-of-custody form, packed on ice in an insulated cooler, and submitted via hand delivery to ALS Environmental, in Houston, Texas. Quality control and assurance methods were employed, including the collection and analyses of a duplicate sample, field blank, matrix spike (MS), and matrix spike duplicate (MSD).

Tables 2-3 through 2-6 include the Gauging Data and Groundwater Field Parameters for the sampling and re-sampling events conducted in 2025.

2.6 Monitoring Wells Installed or Decommissioned

No monitoring wells were installed or decommissioned in 2025 at the current CCR Units.

3.0 Status of Groundwater Monitoring and Corrective Action Program

3.1 Semi-Annual Detection Monitoring Summary

This Annual Report provides the monitoring data for the two semi-annual detection monitoring events that were performed for all three CCR units during February and August 2025. In addition, this Annual Report provides the previous monitoring data from 2023 and 2024. Based on the data and results of the monitoring activities during 2025, the status of the groundwater monitoring and corrective action program at the Station including key actions completed, problems encountered, and actions to resolve the problems are summarized in the following subsections.

3.2 Key Actions Completed

The following key actions were completed during 2025:

- The *2024 Annual Groundwater Monitoring and Corrective Action Report* was prepared per §257.90(e) and (f) of the Federal CCR Rule and 30 TAC Chapter 352 of the TCEQ CCR Permit Program, placed into the FOR by January 31, 2025, and posted to NRG's publicly accessible CCR website by March 2, 2025,
- The first and second half 2025 semi-annual detection monitoring events for the CCR units were performed during February and August 2025 and the samples were analyzed for the Appendix III detection monitoring constituents,
- Resampling monitoring events were performed during March, April and September 2025 to confirm the detection of potential SSIs,
- To perform the statistical analysis for the two semi-annual (February and August) semi-annual detection monitoring events, the Appendix III analytical results were compared to the new background water quality data set developed using the eight quarterly detection monitoring events performed beginning in the third quarter of 2019 through the second quarter of 2021,
- Groundwater potentiometric surface maps were prepared for the CCR units for the February and August 2025 semi-annual detection monitoring events,
- The directions and apparent flow rate of groundwater were determined,
- Potential SSIs above background were identified for the CCR units for the first half 2025, and second half 2025 semi-annual detection monitoring events,
- NRG notified TCEQ in May 2025 pursuant to the TCEQ CCR Permit Program that potential SSIs had been identified for the first half 2025 (February) semi-annual detection monitoring event. An ASD was submitted to the TCEQ in the third quarter of 2025,
- NRG notified TCEQ in December 2025 pursuant to the TCEQ CCR Permit Program that potential SSIs had been identified for the second half 2025 (August) semi-annual detection monitoring event and that NRG would prepare and submit an ASD with this Annual Report, and
- Written ASDs were completed during 2025 that successfully demonstrated that potential SSIs above background for the first half 2025 (February) and second half 2025 (August) semi-annual detection monitoring events were due to alternative sources.

Based on the successful completion of written ASDs, all three CCR units remained in detection monitoring during 2025. No corrective action activities were performed for the CCR units pursuant to the TCEQ Permit Program during 2025.

3.3 Problems Encountered and Resolution

During 2025, no problems were encountered for the CCR groundwater monitoring program for the Station and no actions were taken to resolve problems.

4.0 Statistical Analysis and Results

This Annual Report identifies potential SSIs above background that were determined for groundwater samples collected during the February 2025, and August 2025 semi-annual detection monitoring events.

4.1 February 2025 Semi-Annual Detection Monitoring Event

Statistical analysis and identification of potential SSIs for the first half 2025 (February 2025) semi-annual detection monitoring event were completed during May 2025. Select wells and analytes were resampled in March 2025 following receipt of the initial sampling data, and in April 2025 for a well in an area of plant construction that was not accessible during the March 2025 event. The statistical analysis was conducted in accordance with the revised Statistical Methods Certification (August 2018) using Lower Tolerance Limits (LTLs) where applicable, and upper tolerance limits (UTLs) per the TCEQ CCR Permit Program.

The eighth and final quarterly background detection monitoring event was performed during April 2021 as part of the development of a new background groundwater quality data set for the groundwater monitoring program. Statistical analysis and identification of potential SSIs for the March 2024 semi-annual detection monitoring event was performed using the new background water quality data set. Per the TCEQ CCR Permit Program, potential SSIs were identified in Maay 2025 for the February 2025 semi-annual detection monitoring event.

The results of the statistical analysis for the February 2025 semi-annual detection monitoring event for the three CCR units are summarized below in Tables 4-1, 4-2, and 4-3. In accordance with 30 TAC Chapter 352, ASDs were successfully performed during 2025 to evaluate the potential SSIs as discussed in Section 5.0, which are provided with the 2025 Annual Report. The ASDs were also submitted to TCEQ in July 2025.

4.1.1 SWDA CCR Multiunit Landfill

The results of the statistical analysis for the February 2025 semi-annual detection monitoring event are summarized in the table below. Two potential SSIs were identified in upgradient monitoring well MW-23R.

Table 4-1
Potential SSIs – February 2025, Detection Monitoring, SWDA CCR Multiunit Landfill SSIs

Analyte	Well	LTL	UTL	Sample Date	Value	Unit
UPGRADIENT MONITORING WELLS						
Calcium	MW-23R	N/A	418	02/28/2025	547	mg/L
Sulfate	MW-23R	N/A	673	02/28/2025	1,720	mg/L

mg/L = milligrams per liter N/A = Not Applicable
LTL – Lower Tolerance Limit UTL – Upper Tolerance Limit

4.1.2 E Pond

The results of the statistical analysis for the February 2025 semi-annual detection monitoring event are summarized in the table below. Seven potential SSIs were identified. The seven potential SSIs were identified in downgradient monitoring wells MW-37, MW-38R, and MW-61R.

Table 4-2
Potential SSIs – February 2025, Detection Monitoring, E Pond SSIs

Analyte	Well	LTL	UTL	Sample Date	Value	Unit
DOWNGRADIENT MONITORING WELLS						
Boron	MW-37	N/A	0.116	02/28/2025	0.508	mg/L
Calcium	MW-37	N/A	291.2	02/28/2025	315	mg/L
Sulfate	MW-37	N/A	474	02/28/2025	1,440	mg/L
Boron	MW-38R	N/A	0.116	02/28/2025	0.372	mg/L
Sulfate	MW-38R	N/A	474	02/28/2025	777	mg/L
Sulfate	MW-61R	N/A	474	04/30/2005	626	mg/L
TDS	MW-61R	N/A	1,826	04/30/2005	1,900	mg/L

mg/L = milligrams per liter N/A = Not Applicable
LTL – Lower Tolerance Limit UTL – Upper Tolerance Limit

4.1.3 APH Pond

The results of the statistical analysis for the February 2025 semi-annual detection monitoring event are summarized in the table below. Three potential SSIs were identified in downgradient monitoring well MW-63.

Table 4-3
Potential SSIs – February 2025, Detection Monitoring, APH Pond SSIs

Analyte	Well	LTL	UTL	Sample Date	Value	Unit
DOWNGRADIENT MONITORING WELLS						
Boron	MW-63	N/A	0.23	02/28/2025	0.743	mg/L
Fluoride	MW-63	N/A	0.20	02/28/2025	0.280	mg/L
pH	MW-63	N/A	6.90	02/28/2025	7.21	s.u.

mg/L = milligrams per liter N/A = Not Applicable
LTL – Lower Tolerance Limit UTL – Upper Tolerance Limit s.u. – Standard Units

4.2 August 2025 Semi-Annual Detection Monitoring Event

Statistical analysis and identification of potential SSIs for the second half 2025 (August) semi-annual detection monitoring event were completed during August 2025. Select wells and analytes were resampled in September 2025 following receipt of the August 2025 sampling data. The statistical analysis was conducted in accordance with the revised Statistical Methods Certification (August 2018) using LTLs where applicable, and UTLs per the TCEQ CCR Permit Program.

The results of the statistical analysis for the August 2025 semi-annual detection monitoring event for the three CCR units are summarized below in Tables 4-4, 4-5, and 4-6. In accordance with 30 TAC Chapter 352, ASDs were successfully performed to evaluate the potential SSIs as discussed in Section 5.0, which are provided with this Annual Report. The ASDs were also submitted to TCEQ in December 2025.

4.2.1 SWDA CCR Multiunit Landfill

The results of the statistical analysis for the August 2025 semi-annual detection monitoring event are summarized in the table below. Five potential SSIs were identified. Three potential SSI in upgradient monitoring well MW-23R, and two potential SSIs in downgradient monitoring wells MW-28D and MW-58.

Table 4-4
Potential SSIs – August 2025, Detection Monitoring, SWDA CCR Multiunit Landfill SSIs

Analyte	Well	LTL	UTL	Sample Date	Value	Unit
UPGRADIENT MONITORING WELLS						
pH	MW-23R	6.9	8.8	09/05/2025	6.69	s.u.
Calcium	MW-23R	N/A	418	09/05/2025	481	mg/L
Sulfate	MW-23R	N/A	673	09/05/2025	1,530	mg/L
DOWNGRADIENT MONITORING WELLS						
pH	MW-28D	6.9	8.8	09/05/2025	6.84	s.u.
Boron	MW-58	N/A	0.65	09/05/2025	3.30	mg/L

mg/L = milligrams per liter N/A = Not Applicable
LTL – Lower Tolerance Limit UTL – Upper Tolerance Limit s.u. – Standard Units

4.2.2 E Pond

The results of the statistical analysis for the August 2025 semi-annual detection monitoring event are summarized in the table below. Seven potential SSIs were identified in downgradient monitoring wells MW-37, MW-38R, and MW-61R.

Table 4-5
Potential SSIs – August 2025, Detection Monitoring, E Pond SSIs

Analyte	Well	LTL	UTL	Sample Date	Value	Unit
DOWNGRADIENT MONITORING WELLS						
Boron	MW-37	N/A	0.116	09/05/2025	0.481	mg/L
Sulfate	MW-37	N/A	474	09/05/2025	1,300	mg/L
TDS	MW-37	N/A	1,826	09/05/2025	2,960	mg/L
Boron	MW-38R	N/A	0.116	09/05/2025	0.390	mg/L
Sulfate	MW-38R	N/A	474	09/05/2025	715	mg/L
Sulfate	MW-61R	N/A	474	09/05/2025	659	mg/L
TDS	MW-61R	N/A	1,826	9/26/202409/05/2025	1,940	mg/L

mg/L = milligrams per liter
LTL – Lower Tolerance Limit
N/A = Not Applicable
UTL – Upper Tolerance Limit

4.2.3 APH Pond

The results of the statistical analysis for the August 2025 semi-annual detection monitoring event are summarized in the table below. One potential SSI was identified in upgradient monitoring well MW-39R and six potential SSIs were identified in downgradient monitoring wells MW-41, MW-63 and MW-64.

Table 4-6
Potential SSIs – August 2025, Detection Monitoring, APH Pond SSIs

Analyte	Well	LTL	UTL	Sample Date	Value	Unit
UPGRADIENT MONITORING WELLS						
Boron	MW-39R	N/A	0.23	09/05/2025	0.387	mg/L
DOWNGRADIENT MONITORING WELLS						
Fluoride	MW-41	N/A	0.20	09/05/2025	0.250	mg/L
pH	MW-41	6.4	6.9	09/05/2025	7.12	s.u.
Boron	MW-63	N/A	0.23	09/05/2025	0.232	mg/L
Fluoride	MW-63	N/A	0.20	09/05/2025	0.240	mg/L

Table 4-6
Potential SSIs – August 2025, Detection Monitoring, APH Pond SSIs

Analyte	Well	LTL	UTL	Sample Date	Value	Unit
Sulfate	MW-63	N/A	360	09/05/2025	586	mg/L
Fluoride	MW-64	N/A	0.20	09/05/2025	0.330	mg/L

mg/L = milligrams per liter N/A = Not Applicable
LTL – Lower Tolerance Limit UTL – Upper Tolerance Limit s.u. – Standard Units

5.0 Alternative Source Demonstrations

As described in Section 4.0, potential SSIs above background levels were identified for the three CCR units for the first half (February) 2025, and the second half (August) 2025 semi-annual detection monitoring events. ASDs were prepared for the first half (February) 2025 monitoring events during 2025 that successfully documented that alternative sources or historical errors in statistical analysis were responsible for the potential SSIs observed. The ASDs were submitted to TCEQ in July 2025.

ASDs for the three CCR units for the second half (August) 2025 monitoring event were prepared and submitted to the TCEQ during December 2025. At the request of TCEQ, these ASDs are appended to this Annual Report in Appendix D.

Pursuant to the TCEQ CCR Permit Program, the owner or operator may demonstrate that a source other than the CCR unit caused the SSI(s) over background levels for a constituent or that the SSI resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. To evaluate the potential SSIs and to determine whether an ASD could be successfully demonstrated for the CCR Units, ASDs were completed and certified by a qualified Texas P.E. during 2025 per 30 TAC Chapter 352 as follows:

- In July 2025, ASDs were certified for potential SSIs for the three CCR units for the first half (February) 2025 semi-annual detection monitoring sampling event, and
- In December 2025, ASDs were certified for potential SSIs for the three CCR units for the second half (August) 2025 semi-annual detection monitoring sampling event.

The first half 2025 ASDs were submitted to TCEQ for review and approval pursuant to the TCEQ CCR Permit Program. The second half 2025 ASDs are being submitted to TCEQ for review and approval with this Annual Report at the request of TCEQ.

Pursuant to the TCEQ CCR Permit Program, ASDs were successfully completed for the three CCR units. Therefore, all three CCR units remained in detection monitoring during 2025. A total of six ASDs were completed during 2025, which are discussed in the subsections below. The completed ASDs are provided in Appendix D.

5.1 Summary of ASDs

5.1.1 SWDA CCR Multiunit Landfill

Two ASDs were successfully completed for the SWDA CCR Multiunit Landfill during 2025. The ASDs are summarized for the first half (February) 2025 and second half (August) 2025 semi-annual detection monitoring sampling events below:

- February 2025. Calcium and sulfate were identified for upgradient monitoring well MW-23R. The ASD was completed in July 2025. Alternative sources were identified for the potential SSIs:

  1) Natural variations in upgradient background groundwater quality;
  2) Enhanced minerals dissolution and changes in geochemical conditions within the aquifer; and
  3) Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

- August 2025. Calcium, sulfate and pH were identified for upgradient monitoring well MW-23R; boron was identified for downgradient monitoring well MW-58, and pH was identified for downgradient monitoring well MW-28D. The ASD was completed in December 2025. Alternative sources were identified for the potential SSIs:

  1) Natural variations in upgradient background groundwater quality;
  2) Enhanced minerals dissolution and changes in geochemical conditions within the aquifer; and
  3) Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

5.1.2 E Pond

Two ASDs were successfully completed for the E Pond during 2025. The ASDs are summarized for the first half (February) 2025 and second half (August) 2025 semi-annual detection monitoring sampling events below:

- February 2025. Seven potential SSIs were identified in three downgradient monitoring wells, MW-37, MW-38R and MW-61R. Boron, calcium and sulfate at MW-37; boron and sulfate at MW-38R and sulfate and TDS at MW-61, were identified as potential SSIs. The ASD was completed in July 2025 Alternative sources were identified for the potential SSIs:

  1) The bottom of the E Pond is separated from the upper aquifer system by a confining unit that hydraulically isolates the bottom of the E Pond from the upper aquifer system. Improperly installed or damaged monitoring wells may have historically provided a conduit for CCR constituents to migrate into the upper aquifer system.

2) The former, historical presence of CCR materials in the vicinity of the monitoring wells prior to their modification to include risers from the ground surface provided an opportunity for surface materials to inadvertently enter the wells directly from the ground surface.
3) Water quality improved incrementally with each improvement to the CCR groundwater monitoring network over time. In July 2019, MW-38 was severely damaged by mobile plant equipment. MW-38 was abandoned and MW-38R was installed adjacent to the former location of MW-38. Starting in August 2019 the analytical data for MW-38R indicates significantly improved overall groundwater quality .
4) It appears that the construction activities that occurred during the retrofit of the E Pond per the federal CCR Rule and the Closure Plan during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer as follows:
   a. As a result of removal of water from the E Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
   b. Excavation of all CCR and decontamination of the E Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
   c. Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration;
   d. As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents;
5) As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters;
6) Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition; and
7) Various concentrations so Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

- August 2025. Seven potential SSIs were identified at three downgradient monitoring wells (MW-37, MW-38R and MW-61R). Boron, sulfate and TDS at MW-37; boron and sulfate at MW-38R and sulfate and TDS at MW-61R were identified as potential SSIs. The ASD was completed in December 2025. Alternative sources were identified for the potential SSIs:

  1) The bottom of the E Pond clay liner is separated from the upper aquifer system by a confining unit that hydraulically isolates the bottom of the E Pond from the upper aquifer system. Improperly installed or damaged monitoring wells may have historically provided a conduit for CCR constituents to migrate into the upper aquifer system.
  2) The former, historical presence of CCR materials in the vicinity of the monitoring wells prior to their modification to include risers from the ground surface provided an opportunity for surface materials to inadvertently enter the wells directly from the ground surface.

3) Water quality improved incrementally with each improvement to the CCR groundwater monitoring network over time. In July 2019, MW-38 was severely damaged by mobile plant equipment. MW-38 was abandoned and MW-38R was installed adjacent to the former location of MW-38. Starting in August 2019 the analytical data for MW-38R indicates significantly improved overall groundwater quality .
4) It appears that the construction activities that occurred during the retrofit of the E Pond per the federal CCR Rule and the Closure Plan during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer as follows:
   a. As a result of removal of water from the E Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
   b. Excavation of all CCR and decontamination of the E Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
   c. Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
   d. As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.
5) As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.
6) Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition.
7) Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

5.1.3 APH Pond

Two ASDs were successfully completed for the APH Pond during 2025. The ASDs are summarized for the first half (February) 2025 and second half (August) 2025 semi-annual detection monitoring sampling events below:

- February 2025. Three potential SSIs were identified in one downgradient monitoring wells (MW-63). Boron, fluoride and pH were identified as potential SSIs. The ASD was completed in July 2025. Alternative sources were identified for the potential SSIs:

1) It appears that the construction activities that occurred during the retrofit of the APH Pond per the federal CCR Rule during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer;
   a. As a result of removal of water from the APH Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;

b. Excavation of all CCR and decontamination of the APH Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
c. Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
d. As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.

2) As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.
3) Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition.
4) Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

- August 2025. Boron was identified for upgradient monitoring well MW-40. Six potential SSIs were identified in downgradient monitoring wells (MW-41, MW-63 and MW-64). Fluoride and pH at MW-41; boron, fluoride and sulfate at MW-63 and fluoride at MW-64 were identified as potential SSIs. The ASD was completed in December 2025. Alternative sources were identified for the potential SSIs:

1) It appears that the construction activities that occurred during the retrofit of the APH Pond per the federal CCR Rule during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer as follows:
    a. As a result of removal of water from the APH Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
    b. Excavation of all CCR and decontamination of the APH Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
    c. Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
    d. As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.
2) As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.

3) Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition.
4) Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

5.2 Detection Monitoring During 2025

As discussed previously, written ASDs were completed and certified by a qualified Texas P.E. during 2025 for the three CCR units. The ASDs successfully demonstrated that alternative sources were responsible for the potential SSIs identified in groundwater for the first half (February) 2025 and second half (August) 2025 semi-annual detection monitoring events. Therefore, all three CCR units remained in detection monitoring programs at the start and end of 2025.

5.3 Transition Between Monitoring Programs

During 2025, the groundwater monitoring system for all three CCR units remained in detection monitoring. Therefore, there was no transition between detection and assessment monitoring programs for the CCR units during 2025.

6.0 Projected Key Activities and Timelines for 2026

Key activities and project timelines for 2026 will be performed pursuant to TCEQ's CCR Permit Program and are as follows:

- The *2025 Annual Report* will be prepared and placed into the Station's Facility Operating Record (FOR) by January 31, 2026, submitted to the TCEQ within 30 days of placement in the FOR, and posted to the Station's publicly accessible CCR website by March 2, 2026,
- ,
- Both semi-annual groundwater detection monitoring events for the three CCR units will be performed during the first and second halves of 2026 (February and August) for the Appendix III detection monitoring parameters,
- As necessary, the first and second half 2026 resampling detection monitoring events for the Landfill CCR will be performed within 30 days of the original monitoring events and samples will be reanalyzed for select Appendix III detection monitoring constituents,
- Groundwater potentiometric surface maps will be prepared for the first and second halves of 2026 semi-annual detection monitoring events,
- The flow rates and directions of groundwater flow will be determined for the first and second halves of 2026 semi-annual detection monitoring events,
- Statistical analysis and identification of potential SSIs will be performed for the first and second halves of 2026 semi-annual detection monitoring events,
- NRG will notify TCEQ, if required, if potential SSIs are identified and whether ASDs will be prepared for the first and second halves of 2026 semi-annual detection monitoring events,

- Written ASDs will be prepared and submitted to TCEQ for review and approval, if required, to evaluate potential SSIs above background for the first and second halves of 2026 semi-annual detection monitoring events, and
- It is anticipated that the new landfill cell at the SWDA will be permitted by TCEQ and quarterly background monitoring for the associated monitoring wells will begin in 2026.

7.0 Conclusions and Recommendations

In conclusion, this Annual Report contains the information required pursuant to 30 TAC §352.901 and 30 TAC §352.902 and Subsection 1.2 of the TCEQ Draft Technical Guidance No. 32 of the TCEQ CCR Permit Program. This information is provided in this Annual Report. No other information is required to be included in the Annual Report as specified in 30 TAC §352.971 and §352.981 of the TCEQ CCR Permit Program. The following key actions were completed during 2025:

- The *2024 Annual Groundwater Monitoring and Corrective Action Report* was prepared per §257.90(e) and (f) of the Federal CCR Rule and 30 TAC Chapter 352 of the TCEQ CCR Permit Program, placed into the FOR by January 31, 2025, and posted to NRG's publicly accessible CCR website by March 2, 2025,
- The first and second half 2025 semi-annual detection monitoring events for the CCR units was performed during February and August 2025 and the samples were analyzed for the Appendix III detection monitoring constituents,
- Resampling monitoring events were performed during March, April and September 2025 to confirm the detection of potential SSIs,
- To perform the statistical analysis for the two semi-annual (February and August) semi-annual detection monitoring events, the Appendix III analytical results were compared to the new background water quality data set developed using the eight quarterly detection monitoring events performed beginning in the third quarter of 2019 through the second quarter of 2021,
- Groundwater potentiometric surface maps were prepared for the CCR units for the February and August 2025 semi-annual detection monitoring events,
- The directions and apparent flow rate of groundwater were determined,
- Potential SSIs above background were identified for the CCR units for the first half 2025, and second half 2025semi-annual detection monitoring events,
- NRG notified TCEQ in April 2025 pursuant to the TCEQ CCR Permit Program that potential SSIs had been identified for the first half 2025 (February) semi-annual detection monitoring event. An ASD was submitted to the TCEQ in July 2025,
- NRG notified TCEQ in December 2025 pursuant to the TCEQ CCR Permit Program that potential SSIs had been identified for the second half 2025 (August) semi-annual detection monitoring event and that NRG would prepare and submit an ASD with this Annual Report, and
- Written ASDs were completed during 2025 that successfully demonstrated that potential SSIs above background for the first half 2025 (February) and second half 2025 (August) semi-annual detection monitoring events were due to alternative sources.

Based on the key activities performed during 2025, it is recommended that the SWDA CCR Multiunit Landfill, APH Pond, and the E Pond remain in detection monitoring subject to the following key activities and that the following project timeline be implemented during 2026:

- The *2025 Annual Report* will be prepared and placed into the Station's Facility Operating Record (FOR) by January 31, 2026, submitted to the TCEQ within 30 days of placement in the FOR, and posted to the Station's publicly accessible CCR website by March 2, 2026,
- Both semi-annual groundwater detection monitoring events for the three CCR units will be performed during the first and second halves of 2026 (February and August) for the Appendix III detection monitoring parameters,
- As necessary, the first and second half 2026 resampling detection monitoring events for the CCR units will be performed within 30 days of the original monitoring events and samples will be reanalyzed for select Appendix III detection monitoring constituents,
- Groundwater potentiometric surface maps will be prepared for the first and second halves of 2026 semi-annual detection monitoring events,
- The flow rates and directions of groundwater flow will be determined for the first and second halves of 2026 semi-annual detection monitoring events,
- Statistical analysis and identification of potential SSIs will be performed for the first and second halves of 2026 semi-annual detection monitoring events,
- NRG will notify TCEQ, if required, if potential SSIs are identified and whether ASDs will be prepared for the first and second halves of 2026 semi-annual detection monitoring events,
- Written ASDs will be prepared and submitted to TCEQ for review and approval, if required, to evaluate potential SSIs above background for the first and second halves of 2026 semi-annual detection monitoring events, and
- It is anticipated that the new landfill cell at the SWDA will be permitted by TCEQ and quarterly background monitoring for the associated monitoring wells will begin in 2026.

8.0 References

Federal Register, Vol. 80 No. 74, 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.

Federal Register, Vol. 85, No. 168, August 28, 2020, 40 CFR Part 257, Hazardous and Solid Waste Management System; Disposal of CCR from Electric Utilities; A Holistic Approach to Closure Part A: Deadline to Initiate Closure.

ERM, Sampling and Analysis Plan, October 2017, W.A. Parish Electric Generating Station, Thompsons, Texas.

ERM, CCR Statistical Analysis Plan, October 2017, W.A. Parish Electric Generating Station, Thompsons, Texas.

TCEQ, Draft Technical Guidance No. 32, Coal Combustion Residuals Groundwater Monitoring and Corrective Action.

TCEQ, 30 TAC Chapter 352, Coal Combustion Residuals Waste Management and Registration Program for Coal Combustion Residuals (CCR) Implementation.

TRC, 2018 Annual Groundwater Monitoring and Corrective Action Report, January 31, 2019, W.A. Parish Electric Generating Station, Secondary E Pond (Unit 003) and Landfill (Unit 004), Thompsons, Texas.

TRC, 2019 Annual Groundwater Monitoring and Corrective Action Report, January 31, 2020, W.A. Parish Electric Generating Station, Secondary E Pond (Unit 003) and Landfill (Unit 004), Thompsons, Texas.

TRC, 2020 Annual Groundwater Monitoring and Corrective Action Report, January 31, 2021, W.A. Parish Electric Generating Station, Secondary E Pond (Unit 003) and Landfill (Unit 004), Thompsons, Texas.

TRC, 2021 Annual Groundwater Monitoring and Corrective Action Report, January 31, 2022, W.A. Parish Electric Generating Station, Secondary E Pond (Unit 003) and Landfill (Unit 004), Thompsons, Texas.

TRC, 2022 Annual Groundwater Monitoring and Corrective Action Report, January 31, 2023, W.A. Parish Electric Generating Station, Secondary E Pond (Unit 003) and Landfill (Unit 004), Thompsons, Texas.

TRC, 2023 Annual Groundwater Monitoring and Corrective Action Report, January 31, 2024, W.A. Parish Electric Generating Station, Secondary E Pond (Unit 003) and Landfill (Unit 004), Thompsons, Texas.

TRC, 2024 Annual Groundwater Monitoring and Corrective Action Report, January 31, 2025, W.A. Parish Electric Generating Station, Secondary E Pond (Unit 003) and Landfill (Unit 004), Thompsons, Texas.

TRC, Alternative Source Demonstration, July 2024, W.A. Parish Electric Generating Station, FGD Emergency Pond (SWMU 020), Thompsons, Texas.

TRC, Alternative Source Demonstration, July 2024, W.A. Parish Electric Generating Station, Air Preheater Pond (SWMU 021), Thompsons, Texas.

TRC, Alternative Source Demonstration, July 2024, W.A. Parish Electric Generating Station, Solid Waste Disposal Area (SWMU 001) CCR Multiunit, Jewett, Texas.

TRC, Alternative Source Demonstration, December 2024, W.A. Parish Electric Generating Station, FGD Emergency Pond (SWMU 020), Thompsons, Texas.

TRC, Alternative Source Demonstration, December 2024, W.A. Parish Electric Generating Station, Air Preheater Pond (SWMU 021), Thompsons, Texas.

TRC, Alternative Source Demonstration, December 2024, W.A. Parish Electric Generating Station, Solid Waste Disposal Area (SWMU 001), Thompsons, Texas.

TRC, Groundwater Monitoring System Certification, August 2018, W.A. Parish Electric Generating Station, Thompsons, Texas.

TRC, Statistical Methods Certification, August 2018, W.A. Parish Electric Generating Station, Thompsons, Texas.

Figures

CLIENT / PROJECT

NRG TEXAS POWER, LLC
W.A. Parish Station
Thompsons, Texas

TITLE

SITE LOCATION MAP

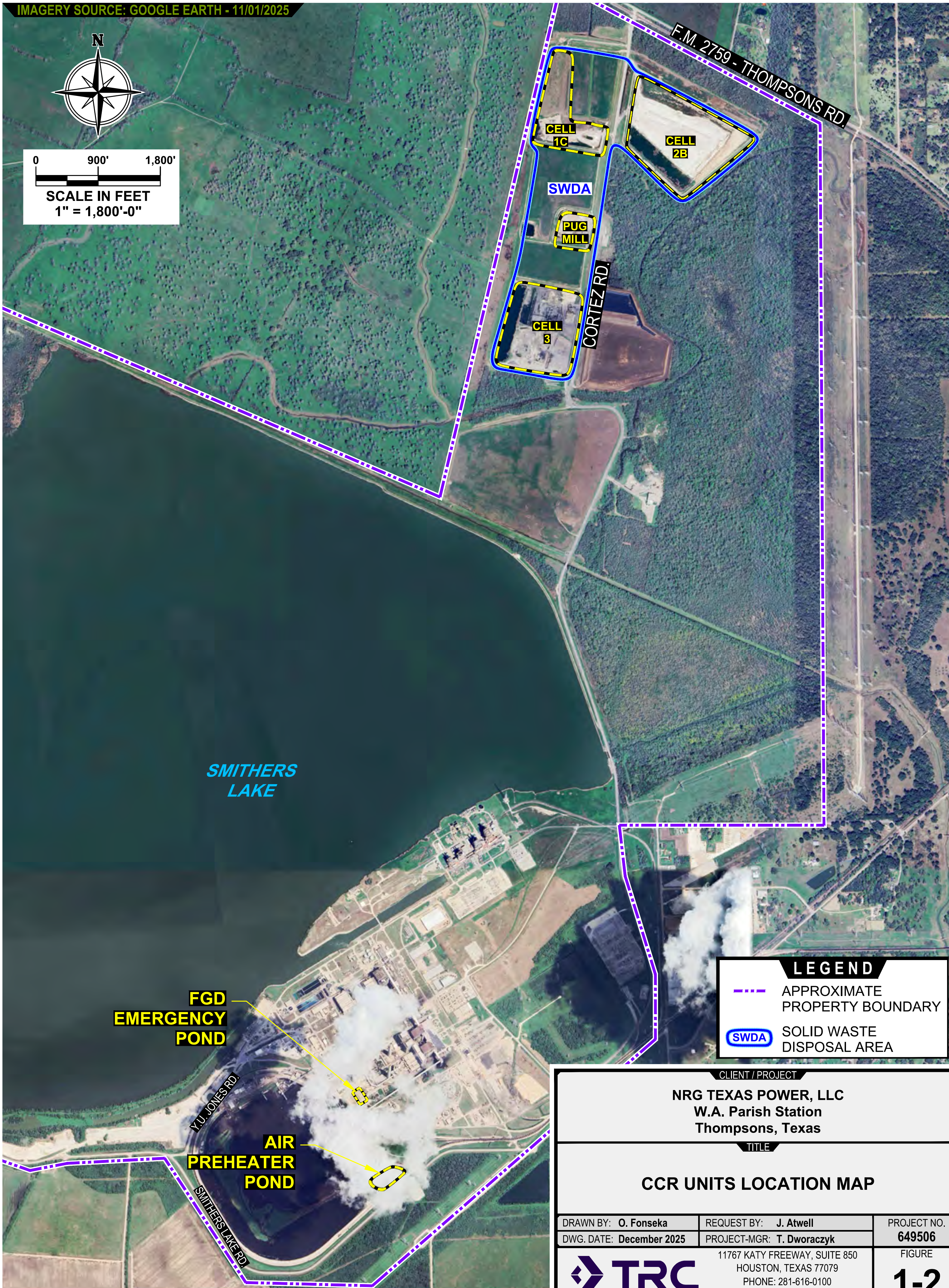
DRAWN BY: O. Fonseka	REQUEST BY: J. Atwell	PROJECT NO. 649506
DWG. DATE: December 2025	PROJECT-MGR: T. Dworaczyk	

TRC
11767 KATY FREEWAY, SUITE 850
HOUSTON, TEXAS 77079
PHONE: 281-616-0100
TRCcompanies.com

FIGURE
1-1

LAST EDIT: 12/30/2025 - FILE LOCATION: HOU C:\OF-TRC\DRAFTING-CDrive\ECR-Files\NRG\W.A. Parish Station - Thompsons-TX\2025\ NRG-WAParishStation- Site Location-n-CCR Units Location.dwg

DRAWING By: Oskar Fonseka - FILE NAME: NRG-WAParishStation- Site Location-n-CCR Units Location.dwg



CLIENT / PROJECT

NRG TEXAS POWER, LLC
W.A. Parish Station
Thompsons, Texas

TITLE

CCR UNITS LOCATION MAP

DRAWN BY: O. Fonseka	REQUEST BY: J. Atwell	PROJECT NO. 649506
DWG. DATE: December 2025	PROJECT-MGR: T. Dworaczyk	

TRC
11767 KATY FREEWAY, SUITE 850
HOUSTON, TEXAS 77079
PHONE: 281-616-0100
TRCcompanies.com

FIGURE
1-2

LAST EDIT: 12/30/2025 - FILE LOCATION: HOU C:\OF-TRC\DRAFTING-CDrive\ECR-Files\NRG\W.A. Parish Station - Thompons-TX\2025\ NRG-WAParishStation- Site Location-n-CCR Units Location.dwg

DRAWING By: Oskar Fonseka - FILE NAME: NRG-WAParishStation- Site Location-n-CCR Units Location.dwg

LEGEND

- Upgradient Monitoring Well
- Multiunit Downgradient Monitoring Well

0 250 500 Feet

1 " = 500 '

1:6,000

N

NOTE:
R = Monitoring Well replaced in 2019

TRC
11767 Katy Freeway
Suite 850
Houston, TX 77079
713.244.1000
www.trcsolutions.com

PROJECT:

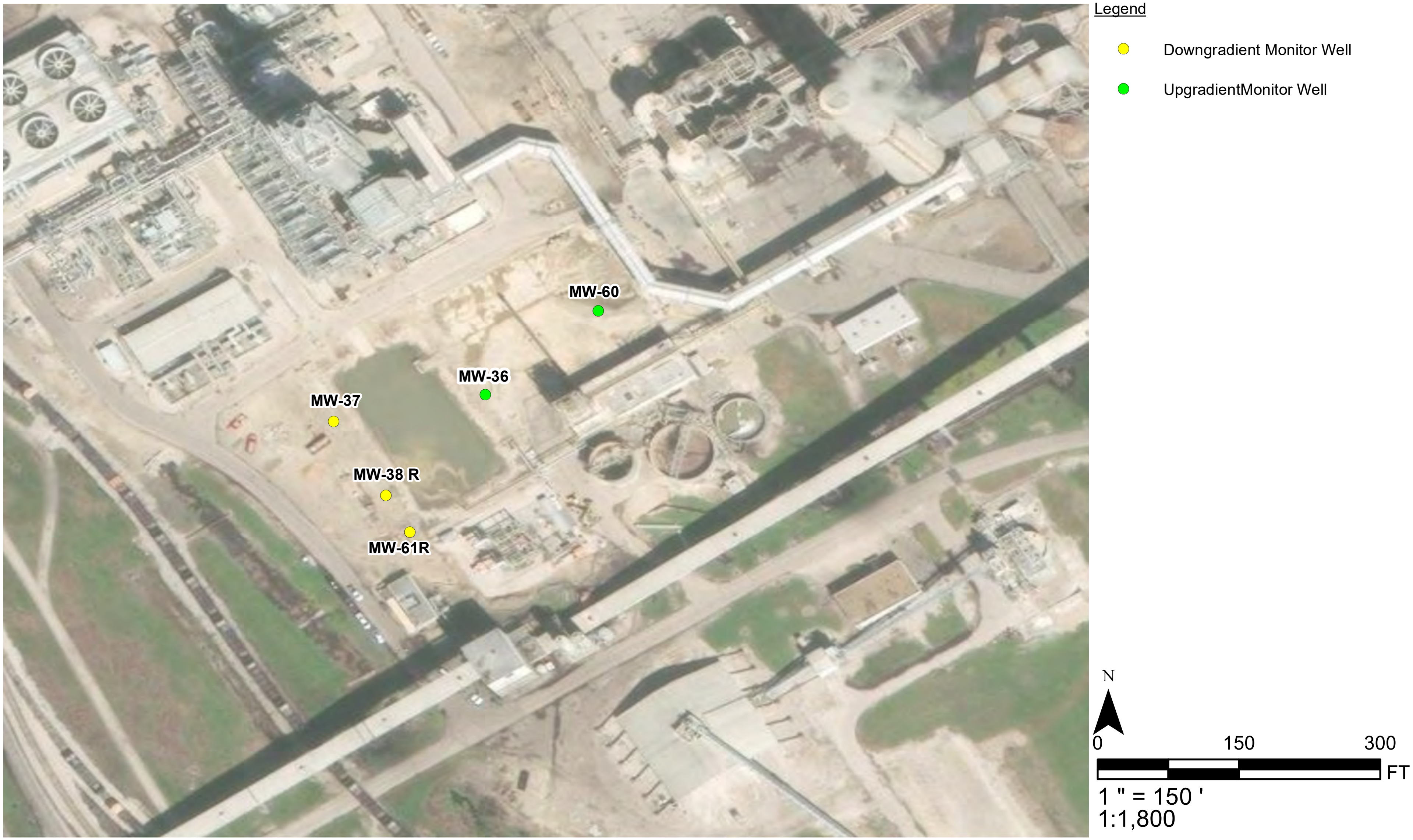
NRG TEXAS POWER, LLC
W.A. PARISH STATION
THOMPSONS, TEXAS

TITLE:

SOLID WASTE DISPOSAL AREA GROUNDWATER MONITORING NETWORK

DRAWN BY:	F. YARBROUGH
CHECKED BY:	J. ATWELL
APPROVED BY:	A. DWORACZYK
DATE:	DECEMBER 2025
PROJ NO:	649506.0000.0000
FILE:	649506.0000_2-1.mxd

FIGURE 2-1



TRC

11767 Katy Freeway
Suite 850
Houston, TX 77079
713.244.1000
www.trcsolutions.com

PROJECT:

NRG TEXAS POWER, LLC
W.A. PARISH STATION
THOMPSONS, TEXAS

TITLE:

FGD EMERGENCY POND
GROUNDWATER MONITORING NETWORK

DRAWN BY:	F. YARBROUGH
CHECKED BY:	J. ATWELL
APPROVED BY:	A. DWORACZYK
DATE:	December 2025
PROJ. NO:	649506.0000.0000
FILE:	649506.0000_2-2

FIGURE 2-2

Legend

- Downgradient Monitoring Well
- Upgradient Monitoring Well

AERIAL IMAGE SOURCE: GOOGLE EARTH AND THEIR DATA PARTNERS (10/28/2017).

N

0 150 300 FT

1 " = 150 '
1:1,800

TRC

11767 Katy Freeway
Suite 850
Houston, TX 77079
713.244.1000
www.trcsolutions.com

PROJECT:

NRG TEXAS POWER, LLC
W.A. PARISH STATION
THOMPSONS, TEXAS

TITLE:

AIR PREHEATER POND
GROUNDWATER MONITORING NETWORK

DRAWN BY:	F. YARBROUGH
CHECKED BY:	J. ATWELL
APPROVED BY:	A. DWORACZYK
DATE:	DECEMBER 2025
PROJ. NO.:	649506.0000.0000
FILE:	649506.0000_2-3.mxd

FIGURE 2-3

COORDINATE SYSTEM: NAD 1983 2011 STATEPLANE TEXAS SOUTH CENTRAL FIPS 4204 FTUS; MAP ROTATION: 0
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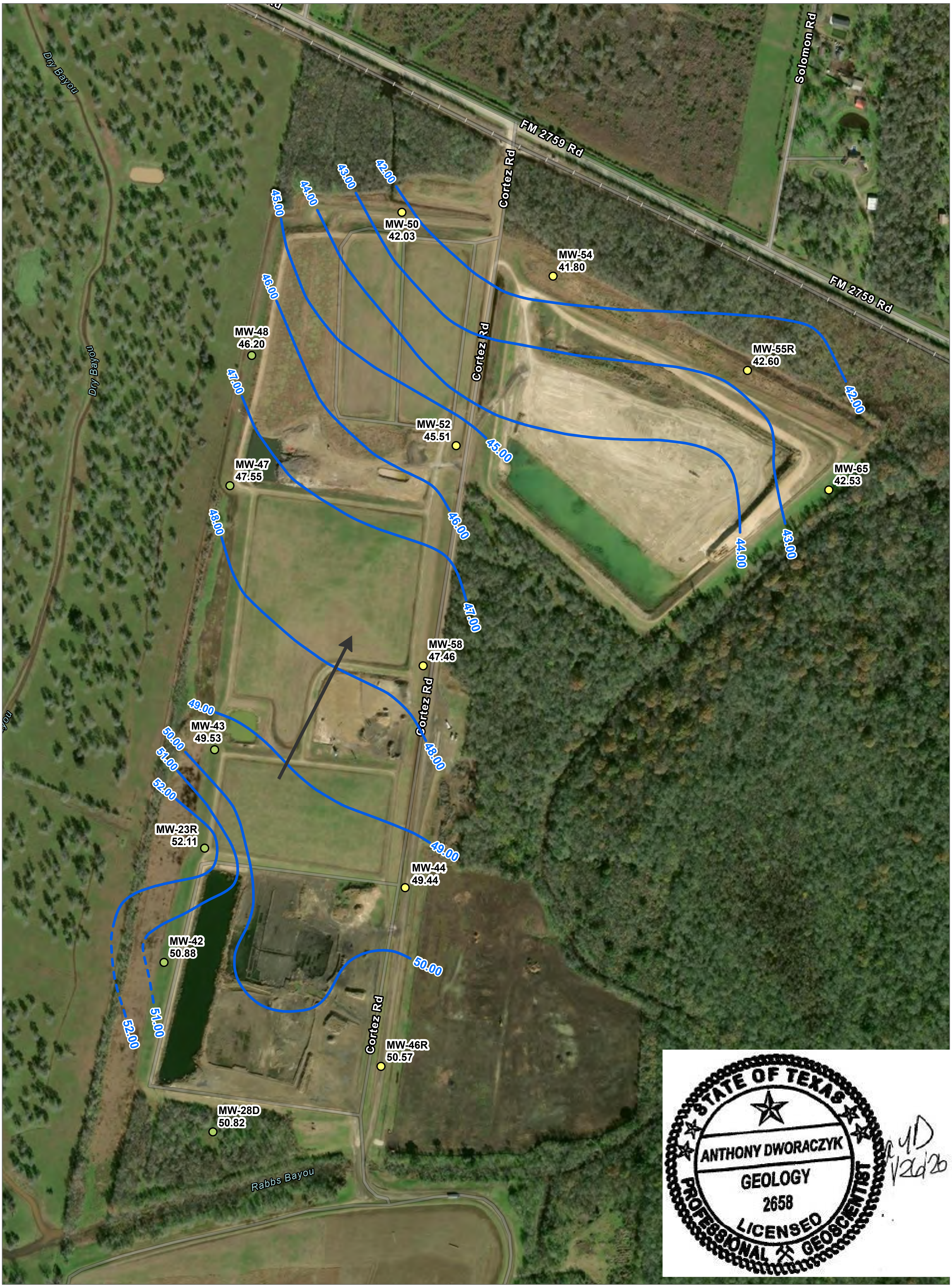


MULTIUNIT UPGRADIENT MONITOR WELL

MULTIUNIT DOWNGRADIENT MONITOR WELL

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR - DASHED WHERE INFERRED (FT MSL)

PROJECT: NRG TEXAS POWER, LLC
W.A. PARISH STATION
THOMPSONS, TEXAS

TITLE: SOLID WASTE DISPOSAL AREA GROUNDWATER POTENTIOMETRIC SURFACE MAP FEBRUARY 2025

DRAWN BY:	M. BILLINGS	PROJ. NO.:	649506
CHECKED BY:	S. MOTURI	FIGURE 2-4	
APPROVED BY:	J. ATWELL		
DATE:	JULY 2025		

BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

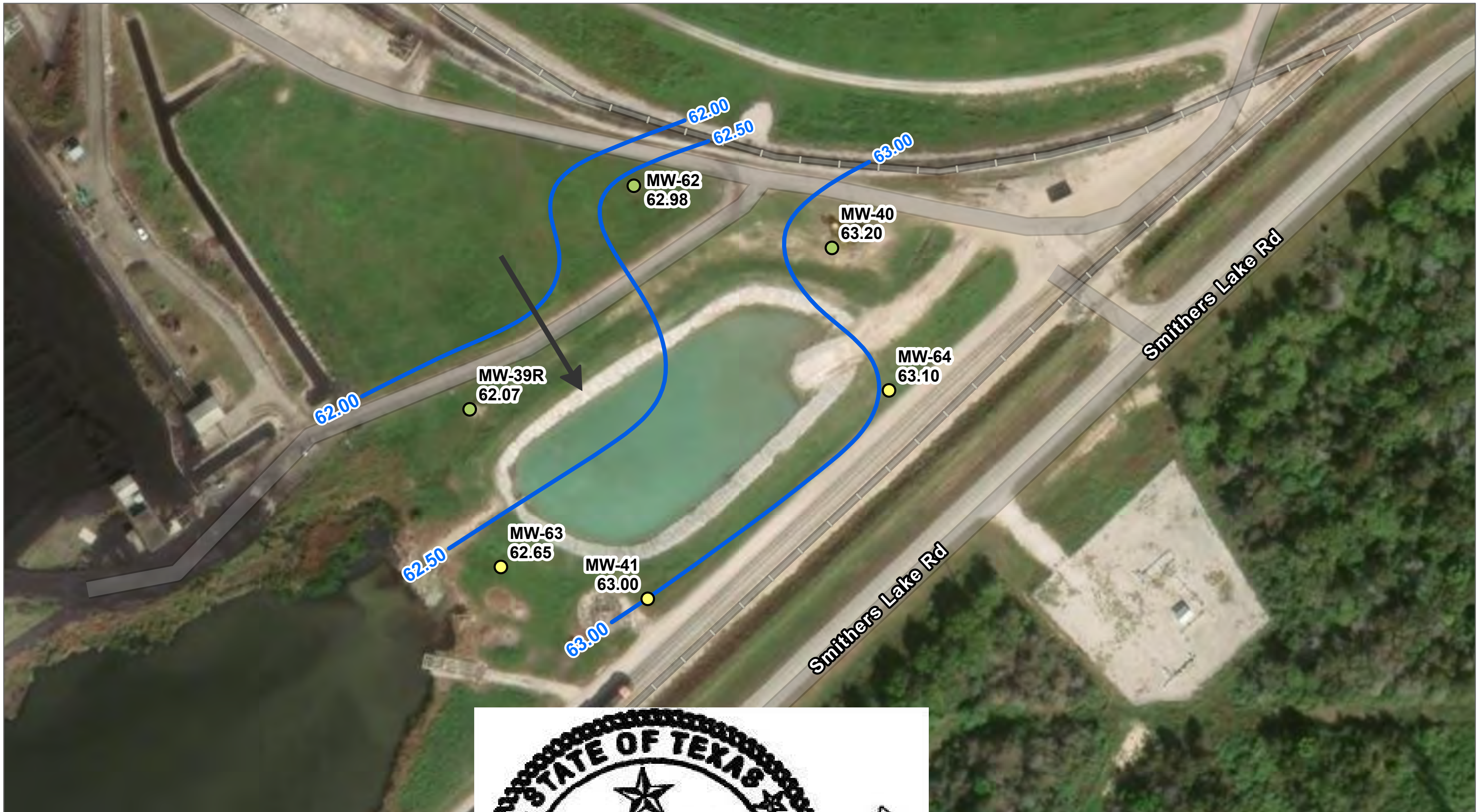
0 250 500 FEET
1:6,000 1" = 500'

NOTE: GROUNDWATER ELEVATION MEASURED BY HMI ON FEBRUARY 2025.

TRC

11767 KATY FREEWAY
SUITE 850
HOUSTON, TX 77079
PHONE: 713.244.1000

FILE: PARISHSTATION_TX_FIGURES



STATE OF TEXAS
ANTHONY DWORACZYK
GEOLOGY
2658
LICENSED
PROFESSIONAL GEOSCIENTIST

MULTIUNIT UPGRADIENT MONITOR WELL

MULTIUNIT DOWNGRADIENT MONITOR WELL

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR (FT MSL)

PROJECT:	NRG TEXAS POWER, LLC W.A. PARISH STATION THOMPSONS, TEXAS
TITLE:	AIR PREHEATER POND GROUNDWATER MONITORING NETWORK
DRAWN BY:	M. BILLINGS
CHECKED BY:	S. MOTURI
APPROVED BY:	J. ATWELL
DATE:	JULY 2025
PROJ. NO.:	649506

FIGURE 2-5

BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

N

0 75 150 FEET

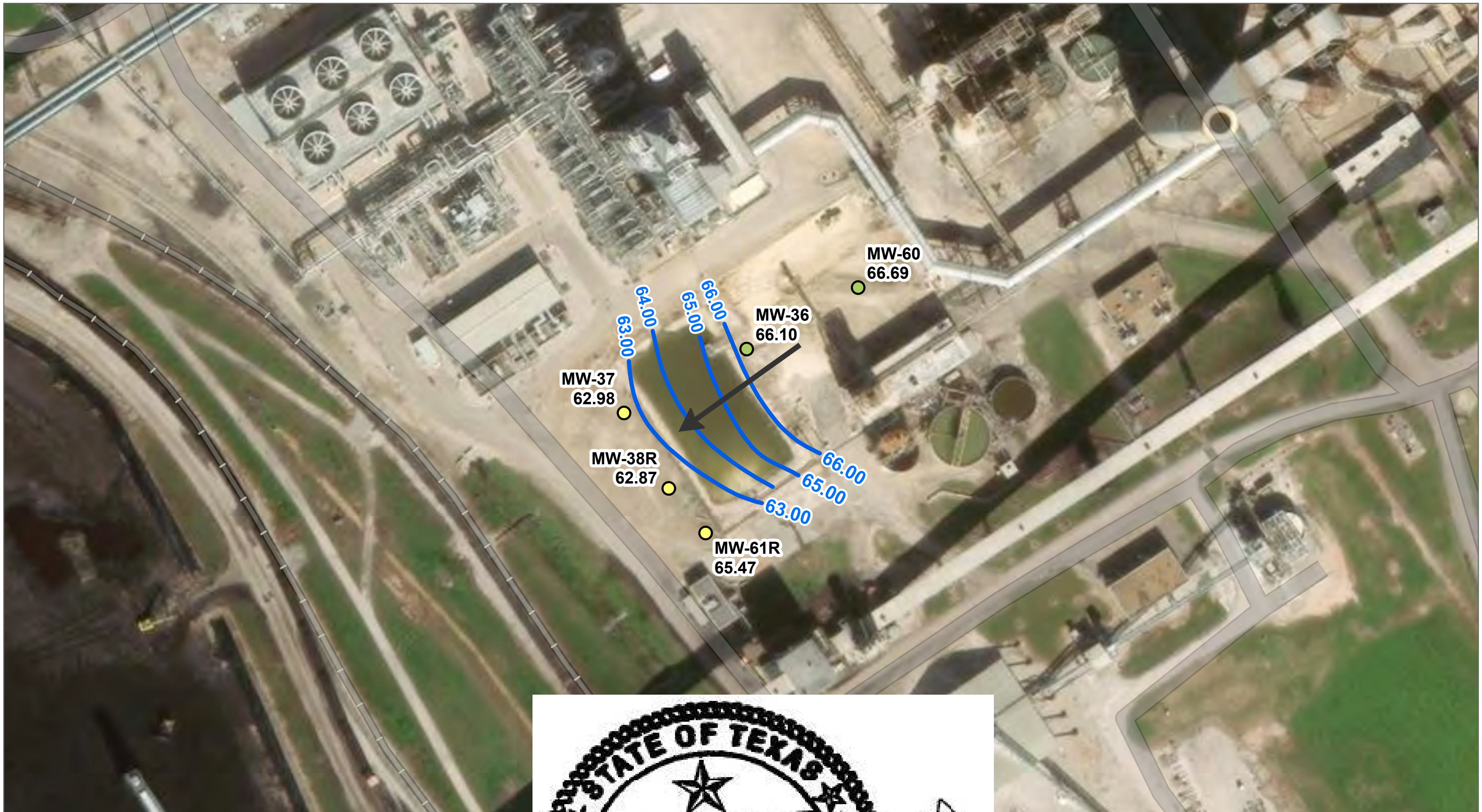
1:1,800 1" = 150'

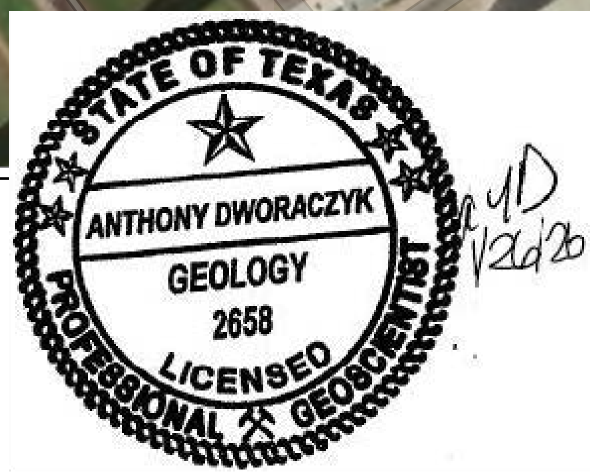
TRC

11767 KATY FREEWAY
SUITE 850
HOUSTON, TX 77079
PHONE: 713.244.1000

FILE: PARISHSTATION_TX_FIGURES

COORDINATE SYSTEM: NAD 1983 2011 STATEPLANE TEXAS SOUTH CENTRAL FIPS 4204 FTUS; MAP ROTATION: 0
-- SAVED BY: MBILLINGS ON 7/23/2025, 10:47:41 AM; FILE PATH: T:\1-PROJECTS\NRG\649506_WA_PARISHSTATION_TEXAS\2-APRX\PARISHSTATION_TX_FIGURES.APRX; LAYOUT NAME: FIG2-5_AIRPREHEATERPOND_8.5X11L





MULTIUNIT UPGRADIENT MONITOR WELL

MULTIUNIT DOWNGRADIENT MONITOR WELL

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR (FT MSL)

PROJECT:	NRG TEXAS POWER, LLC W.A. PARISH STATION THOMPSONS, TEXAS
TITLE:	FGD EMERGENCY POND GROUNDWATER MONITORING NETWORK
DRAWN BY: M. BILLINGS	PROJ. NO.: 649506
CHECKED BY: S. MOTURI	FIGURE 2-6
APPROVED BY: J. ATWELL	
DATE: JULY 2025	

BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

NOTE: MW-61R WAS NOT USED FOR GROUNDWATER ELEVATION CONTOUR.

0 75 150 FEET
1:1,800 1" = 150'

TRC

11767 KATY FREEWAY
SUITE 850
HOUSTON, TX 77079
PHONE: 713.244.1000

FILE: PARISHSTATION_TX_FIGURES

COORDINATE SYSTEM: NAD 1983 2011 STATEPLANE TEXAS SOUTH CENTRAL FIPS 4204 FTUS; MAP ROTATION: 0
-- SAVED BY: MBILLINGS ON 7/23/2025, 10:47:41 AM; FILE PATH: T:\1-PROJECTS\NRG\649506_WA_PARISHSTATION_TEXAS\2-APRX\PARISHSTATION_TX_FIGURES.APRX; LAYOUT NAME: FIG2-6_FGD_EMERGENCYPOND_8.5X11L

COORDINATE SYSTEM: NAD 1983 2011 STATEPLANE TEXAS SOUTH CENTRAL FIPS 4204 FTUS; MAP ROTATION: 0
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MW_PTS_PROJ (DEF QUERY)

- MULTIUNIT UPGRADIENT MONITOR WELL
- MULTIUNIT DOWNGRADIENT MONITOR WELL
- GROUNDWATER FLOW DIRECTION
- GROUNDWATER ELEVATION CONTOUR - DASHED WHERE INFERRED (FT MSL)
- INFERRED

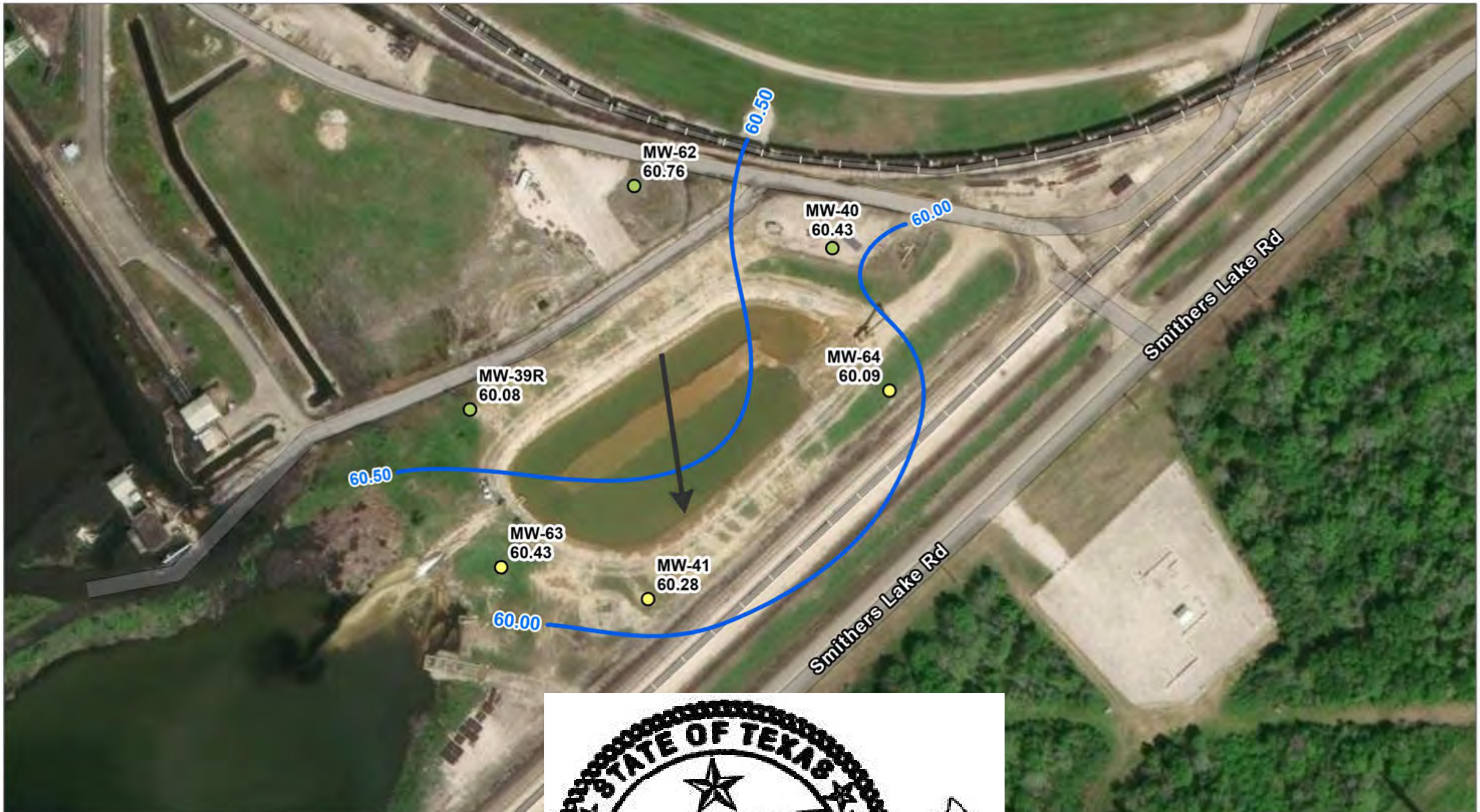
BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

NOTE: GROUNDWATER ELEVATION MEASURED BY HMI ON AUGUST 2025.

0 250 500 FEET
1:6,000 1" = 500'

PROJECT:	NRG TEXAS POWER, LLC W.A. PARISH STATION THOMPSONS, TEXAS
TITLE:	SOLID WASTE DISPOSAL AREA GROUNDWATER POTENTIOMETRIC SURFACE WATER - AUGUST 2025
DRAWN BY:	M. BILLINGS
PROJ. NO.:	649506
CHECKED BY:	S. MOTURI
APPROVED BY:	J. ATWELL
DATE:	DECEMBER 2025
	FIGURE 2-7
FILE:	PARISHSTATION_TX_FIGURES

TRC
11767 KATY FREEWAY
SUITE 850
HOUSTON, TX 77079
PHONE: 713.244.1000



STATE OF TEXAS
ANTHONY DWORACZYK
GEOLOGY
2658
LICENSED
PROFESSIONAL GEOSCIENTIST

AD
1/26/26

MULTIUNIT UPGRADIENT MONITOR WELL

MULTIUNIT DOWNGRADIENT MONITOR WELL

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR (FT MSL)

BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

NOTE: MW-39R WAS NOT USED FOR GROUNDWATER ELEVATION CONTOUR.

N

0 75 150 FEET

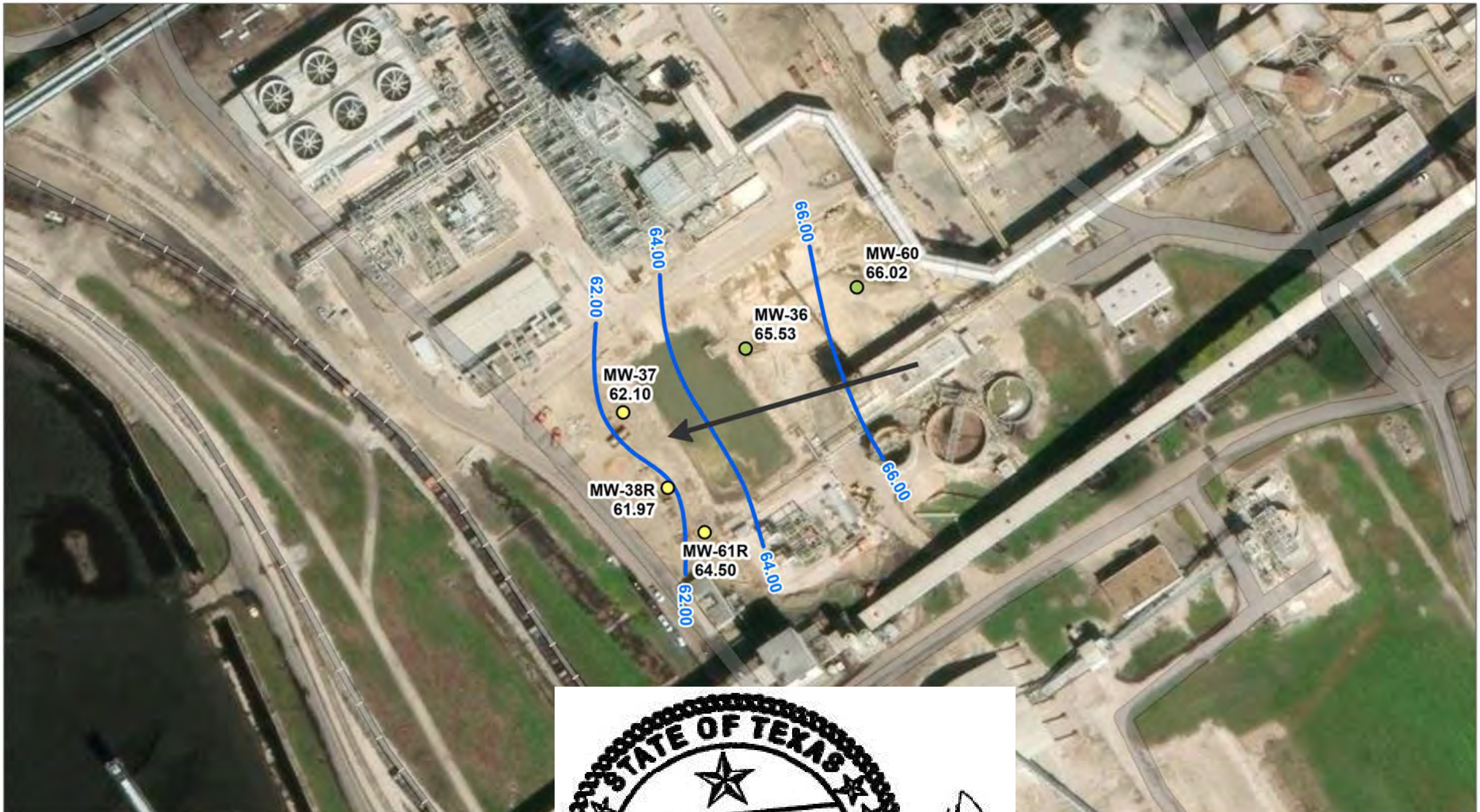
1:1,800 1" = 150'

PROJECT:	NRG TEXAS POWER, LLC W.A. PARISH STATION THOMPSONS, TEXAS
TITLE:	AIR PREHEATER POND GROUNDWATER POTENTRIOMETRIC SURFACE MAP AUGUST 2025
DRAWN BY:	M. BILLINGS
CHECKED BY:	S. MOTURI
APPROVED BY:	J. ATWELL
DATE:	DECEMBER 2025
PROJ. NO.:	649506
	FIGURE 2-8
FILE:	PARISHSTATION_TX_FIGURES

TRC

11767 KATY FREEWAY
SUITE 850
HOUSTON, TX 77079
PHONE: 713.244.1000

COORDINATE SYSTEM: NAD 1983 2011 STATEPLANE TEXAS SOUTH CENTRAL FIPS 4204 FTUS; MAP ROTATION: 0
-- SAVED BY: MBILLINGS ON 12/18/2025, 16:14:58 PM; FILE PATH: T:\1-PROJECTS\NRG\649506_WA_PARISHSTATION_TEXAS\2-APRX\PARISHSTATION_TX_FIGURES.APRX; LAYOUT NAME: FIG2-8_AIRPREHEATERPOND_8.5X11L



STATE OF TEXAS
ANTHONY DWORACZYK
GEOLOGY
2658
LICENSED
PROFESSIONAL GEOSCIENTIST

AD 1/26/26

- MULTIUNIT UPGRADIENT MONITOR WELL
- MULTIUNIT DOWNGRADIENT MONITOR WELL
- GROUNDWATER FLOW DIRECTION
- GROUNDWATER ELEVATION CONTOUR (FT MSL)

PROJECT:	NRG TEXAS POWER, LLC W.A. PARISH STATION THOMPSONS, TEXAS
TITLE:	FGD EMERGENCY POND GROUNDWATER POTENTRIOMETRIC SURFACE MAP AUGUST 2025
DRAWN BY:	M. BILLINGS
CHECKED BY:	S. MOTURI
APPROVED BY:	J. ATWELL
DATE:	DECEMBER 2025
PROJ. NO.:	649506

FIGURE 2-9

BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

NOTE: MW-61R WAS NOT USED FOR GROUNDWATER ELEVATION CONTOUR.

N

0 75 150 FEET

1:1,800 1" = 150'

TRC

11767 KATY FREEWAY
SUITE 850
HOUSTON, TX 77079
PHONE: 713.244.1000

FILE: PARISHSTATION_TX_FIGURES

COORDINATE SYSTEM: NAD 1983 2011 STATEPLANE TEXAS SOUTH CENTRAL FIPS 4204 FTUS; MAP ROTATION: 0
-- SAVED BY: MBILLINGS ON 12/18/2025, 16:45:54 PM; FILE PATH: T:\1-PROJECTS\NRG\649506_WA_PARISHSTATION_TEXAS\2-APRX\PARISHSTATION_TX_FIGURES.APRX; LAYOUT NAME: FIG2-9_FGD_EMERGENCYPOND_8.5X11L

Tables

Table 2-1
Summary of Groundwater Elevation Data
2023 - 2025
WA Parish Electric Generating Station - Thompsons, Texas

Well Description	Monitor Well ID	Measurement Date	Top of Casing (ft. MSL)	Depth to Water (ft.)	Elevation (ft. MSL)
Air Heater Pond					
Downgradient	MW-41	4/3/2023	69.18	8.01	61.17
		5/1/2023	69.18	7.36	61.82
		10/9/2023	69.18	9.25	59.93
		3/1/2024	69.18	6.89	62.29
		8/28/2024	69.18	7.33	61.85
		2/28/2025	69.18	6.18	63.00
		3/26/2025	69.18	8.10	61.08
		8/8/2025	69.18	8.90	60.28
		9/5/2025	69.18	9.63	59.55
	MW-63	4/3/2023	70.35	8.91	61.44
		5/1/2023	70.35	8.49	61.86
		10/9/2023	70.35	10.02	60.33
		11/1/2023	70.35	10.85	59.50
		3/1/2024	70.35	7.91	62.44
		3/29/2024	70.35	7.68	62.67
		8/28/2024	70.35	8.19	62.16
		9/26/2024	70.35	9.65	60.70
		2/28/2025	70.35	7.70	62.65
		3/26/2025	70.35	9.33	61.02
		8/8/2025	70.35	9.92	60.43
		9/5/2025	70.35	10.65	59.70
	MW-64	4/3/2023	70.00	9.31	60.69
		10/9/2023	70.00	10.58	59.42
		11/1/2023	70.00	11.54	58.46
		3/1/2024	70.00	8.10	61.90
		8/28/2024	70.00	8.52	61.48
		9/26/2024	70.00	9.68	60.32
		2/28/2025	70.00	6.90	63.10
		8/8/2025	70.00	9.91	60.09
		9/5/2025	70.00	10.58	59.42
Upgradient	MW-40	4/3/2023	73.92	12.96	60.96
		10/9/2023	73.92	14.18	59.74
		3/1/2024	73.92	11.78	62.14
		8/28/2024	73.92	12.10	61.82
		2/28/2025	73.92	10.72	63.20
		8/8/2025	73.92	13.49	60.43
		9/5/2025	73.92	14.14	59.78
	MW-62	4/3/2023	72.59	11.18	61.41
		10/9/2023	72.59	12.36	60.23
		11/1/2023	72.59	13.20	59.39
		3/1/2024	72.59	10.14	62.45
		8/28/2024	72.59	10.33	62.26
		2/28/2025	72.59	9.61	62.98
		8/8/2025	72.59	11.83	60.76
		9/5/2025	72.59	12.42	60.17

Table 2-1
Summary of Groundwater Elevation Data
2023 - 2025
WA Parish Electric Generating Station - Thompsons, Texas

Well Description	Monitor Well ID	Measurement Date	Top of Casing (ft. MSL)	Depth to Water (ft.)	Elevation (ft. MSL)
Upgradient	MW-39R	4/3/2023	73.50	12.59	60.91
		10/9/2023	73.50	13.80	59.70
		3/1/2024	73.50	11.59	61.91
		8/28/2024	73.50	11.80	61.70
		2/28/2025	73.50	11.43	62.07
		3/26/2025	73.50	12.97	60.53
		8/8/2025	73.50	13.42	60.08
		9/5/2025	73.50	14.13	59.37
SWDA					
Downgradient	MW-44	4/3/2023	68.05	19.30	48.75
		5/1/2023	68.05	19.23	48.82
		10/9/2023	68.05	20.97	47.08
		3/1/2024	68.05	19.70	44.72
		8/28/2024	68.05	18.09	46.33
		2/28/2025	68.05	18.61	49.44
		8/8/2025	68.05	18.68	49.37
	MW-46R	4/3/2023	67.92	17.91	50.01
		5/1/2023	67.92	17.90	50.02
		10/9/2023	67.92	19.56	48.36
		3/1/2024	67.92	18.30	49.62
		3/29/2024	67.92	18.03	49.89
		8/28/2024	67.92	16.82	51.10
		2/28/2025	67.92	17.35	50.57
		8/8/2025	67.92	17.50	50.42
	MW-50	4/3/2023	71.27	30.22	41.05
		10/9/2023	71.27	31.17	40.10
		11/1/2023	71.27	31.38	39.89
		3/1/2024	71.27	30.61	40.66
		3/29/2024	71.27	30.33	40.94
		8/28/2024	71.27	26.62	44.65
		9/26/2024	71.27	27.19	44.08
		2/28/2025	71.27	29.24	42.03
		8/8/2025	71.27	28.49	42.78
	MW-52	4/3/2023	67.91	23.31	44.60
		10/9/2023	67.91	24.63	43.28
		11/1/2023	67.91	24.86	43.05
		3/1/2024	67.91	23.79	44.12
		8/28/2024	67.91	21.06	46.85
		9/26/2024	67.91	21.38	46.53
		2/28/2025	67.91	22.40	45.51
		3/26/2025	67.91	22.56	45.35
		8/8/2025	67.91	21.96	45.95
	MW-54	4/3/2023	68.29	27.52	40.77
		10/9/2023	68.29	28.49	39.80
		11/1/2023	68.29	28.71	39.58
		3/1/2024	68.29	27.89	40.40
		8/28/2024	68.29	24.13	44.16
		2/28/2025	68.29	26.49	41.80
		8/8/2025	68.29	25.78	42.51

Table 2-1
Summary of Groundwater Elevation Data
2023 - 2025
WA Parish Electric Generating Station - Thompsons, Texas

Well Description	Monitor Well ID	Measurement Date	Top of Casing (ft. MSL)	Depth to Water (ft.)	Elevation (ft. MSL)
Downgradient	MW-55R	4/3/2023	69.82	28.28	41.54
		10/9/2023	69.82	29.39	40.43
		11/1/2023	69.82	29.58	40.24
		3/1/2024	69.82	28.64	41.18
		8/28/2024	69.82	25.44	44.38
		9/26/2024	69.82	25.78	44.04
		2/28/2025	69.82	27.22	42.60
		8/8/2025	69.82	26.69	43.13
	MW-58	4/3/2023	65.40	18.70	46.70
		10/9/2023	65.40	20.23	45.17
		11/1/2023	65.40	20.43	44.97
		3/1/2024	65.40	19.19	46.21
		8/28/2024	65.40	17.10	48.30
		2/28/2025	65.40	17.94	47.46
		8/8/2025	65.40	17.78	47.62
		9/5/2025	65.40	18.03	47.37
	MW-65	4/3/2023	66.65	25.18	41.47
		10/9/2023	66.65	26.36	40.29
		11/1/2023	66.65	26.52	40.13
		3/1/2024	66.65	25.48	41.17
		3/29/2024	66.65	25.30	41.35
		8/28/2024	66.65	22.96	43.69
		9/26/2024	66.65	23.13	43.52
		2/28/2025	66.65	24.12	42.53
		8/8/2025	66.65	23.89	42.76
Upgradient	MW-28D	4/3/2023	70.37	20.03	50.34
		10/9/2023	70.37	21.67	48.70
		3/1/2024	70.37	20.42	49.95
		2/28/2025	70.37	19.55	50.82
		8/8/2025	70.37	19.61	50.76
		9/5/2025	70.37	20.18	50.19
	MW-42	4/3/2023	65.88	15.49	50.39
		10/9/2023	65.88	17.21	48.67
		3/1/2024	65.88	15.97	49.91
		8/28/2024	65.88	14.54	51.34
		2/28/2025	65.88	15.00	50.88
		8/8/2025	65.88	15.10	50.78
	MW-43	4/3/2023	66.67	17.70	48.97
		10/9/2023	66.67	19.36	47.31
		3/1/2024	66.67	18.24	48.43
		8/28/2024	66.67	16.42	50.25
		2/28/2025	66.67	17.14	49.53
		8/8/2025	66.67	17.04	49.63
	MW-47	4/3/2023	70.40	23.53	46.87
		10/9/2023	70.40	25.08	45.32
		3/1/2024	70.40	24.09	46.31
		8/28/2024	70.40	21.70	48.70
		2/28/2025	70.40	22.85	47.55
		8/8/2025	70.40	22.58	47.82

Table 2-1
Summary of Groundwater Elevation Data
2023 - 2025
WA Parish Electric Generating Station - Thompsons, Texas

Well Description	Monitor Well ID	Measurement Date	Top of Casing (ft. MSL)	Depth to Water (ft.)	Elevation (ft. MSL)
Upgradient	MW-48	4/3/2023	65.89	20.38	45.51
		10/9/2023	65.89	21.78	44.11
		11/1/2023	65.89	22.02	43.87
		3/1/2024	65.89	20.95	44.94
		3/29/2024	65.89	20.76	45.13
		8/28/2024	65.89	18.17	47.72
		2/28/2025	65.89	19.69	46.20
		8/8/2025	65.89	19.24	46.65
	MW-23R	4/3/2023	67.01	15.42	51.59
		5/1/2023	67.01	15.39	51.62
		10/9/2023	67.01	17.10	49.91
		11/1/2023	67.01	17.19	49.82
		3/1/2024	67.01	15.89	51.12
		3/29/2024	67.01	15.63	51.38
		8/28/2024	67.01	14.45	52.56
		9/26/2024	67.01	14.84	52.17
		2/28/2025	67.01	14.90	52.11
		3/26/2025	67.01	15.21	51.80
		8/8/2025	67.01	14.96	52.05
		9/5/2025	67.01	15.27	51.74
E Pond					
Downgradient	MW-37	4/3/2023	74.17	11.65	62.52
		5/1/2023	74.17	11.39	62.78
		10/9/2023	74.17	9.18	64.99
		11/1/2023	74.17	12.97	61.20
		3/1/2024	74.17	11.08	63.09
		3/29/2024	74.17	10.88	63.29
		8/28/2024	74.17	10.96	63.21
		9/26/2024	74.17	11.82	62.35
		2/28/2025	74.17	11.19	62.98
		3/26/2025	74.17	12.23	61.94
		8/8/2025	74.17	12.07	62.10
		9/5/2025	74.17	12.55	61.62
	MW-38R	4/3/2023	73.68	11.27	62.41
		5/1/2023	73.68	11.02	62.66
		10/9/2023	73.68	12.28	61.40
		11/1/2023	73.68	12.67	61.01
		3/1/2024	73.68	10.67	63.01
		3/29/2024	73.68	10.48	63.20
		8/28/2024	73.68	10.64	63.04
		9/26/2024	73.68	11.50	62.18
		2/28/2025	73.68	10.81	62.87
		3/26/2025	73.68	11.81	61.87
		8/8/2025	73.68	11.71	61.97
		9/5/2025	73.68	12.21	61.47

Table 2-1
Summary of Groundwater Elevation Data
2023 - 2025
WA Parish Electric Generating Station - Thompsons, Texas

Well Description	Monitor Well ID	Measurement Date	Top of Casing (ft. MSL)	Depth to Water (ft.)	Elevation (ft. MSL)
Downgradient	MW-61	4/3/2023	74.49	11.76	62.73
		5/1/2023	74.49	11.47	63.02
		10/9/2023	74.49	12.69	61.80
		11/1/2023	74.49	13.06	61.43
		3/1/2024	74.49	11.11	63.38
		3/29/2024	74.49	10.92	63.57
		8/28/2024	74.49	11.03	63.46
		9/26/2024	74.49	11.99	62.50
	MW-61R	2/28/2025	74.86	9.51	65.35
		4/30/2025	74.86	10.80	64.06
		8/8/2025	74.86	10.48	64.38
		9/5/2025	74.86	10.97	63.89
Upgradient	MW-36	4/3/2023	73.81	8.68	65.13
		10/9/2023	73.81	12.59	61.22
		11/1/2023	73.81	9.53	64.28
		3/1/2024	73.81	7.75	66.06
		8/28/2024	73.81	7.67	66.14
		2/28/2025	73.81	7.71	66.10
		8/8/2025	73.81	8.28	65.53
	MW-60	4/3/2023	72.90	7.49	65.41
		10/9/2023	72.90	7.92	64.98
		3/1/2024	72.90	6.49	66.41
		8/28/2024	72.90	6.34	66.56
		2/28/2025	72.90	6.21	66.69
		8/8/2025	72.90	6.88	66.02

Notes

MSL	Mean sea level
Ft.	Feet
NM	No measurement
n/a	Not applicable

Table 2-3
Summary of Groundwater Monitoring Data
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WA Parish Electric Generating Station - Thompsons, Texas

			Analyte Group	NRG App III													
			Analyte	Boron		Calcium		Chloride		Fluoride		Sulfate		Total Dissolved Solids		pH, Field	
			Unit	mg/L		mg/L		mg/L		mg/L		mg/L		mg/L		su	
			Lab Method	SW6020A				E300		A4500-F C-11		E300		M2540C		NA	
Well Description	Well ID	Sample Date	Duplicate	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals
Air Heater Pond																	
Upgradient	MW-40	04/03/2023	N	0.101		290		526		0.100		117		1830		6.73	
		10/09/2023	N	0.0627		253		496		0.100		120		1420		6.51	
		03/01/2024	N	0.100		288		520		0.100		104		1740		6.62	
		08/28/2024	N	0.0846		309		585		< 0.10	U	89.6		1490		6.58	
		02/28/2025	N	0.0936		258		536		0.110		118		1460		6.58	
		08/08/2025	N	0.101		275		497		0.150		97.5		1720		6.26	
		09/05/2025	N	n/a		n/a		n/a		n/a		n/a		n/a		6.44	
	MW-62	04/03/2023	N	0.0903		181		507		0.150		178		1620		6.84	
		10/09/2023	N	0.0718		202		367		0.170		337		2590		6.62	
		11/01/2023	N	n/a		n/a		n/a		n/a		n/a		1270		6.66	
		03/01/2024	N	0.0871	U	212		431		0.180		238		1510		6.80	
		08/28/2024	N	0.0751		213		467		0.130		271		1300		6.74	
		02/28/2025	N	0.0795		168		519		0.180		163		930		6.83	
		08/08/2025	N	0.0844		192		466		0.220		199		1430		6.39	
		09/05/2025	N	n/a		n/a		n/a		0.200		n/a		n/a		6.55	
	MW-39R	04/03/2023	N	0.131		204		443		< 0.100	U	173		1260		6.71	
		10/09/2023	N	0.0884		174		327		0.0900	J	132		968		6.65	
		03/01/2024	N	0.172		205		321		< 0.10	U	246		1200		6.79	
		08/28/2024	N	0.190		204		342		< 0.10	U	351		1140		6.75	
		02/28/2025	N	0.204		169		321		0.110		212		992		7.05	
		03/26/2025	N	n/a		n/a		n/a		n/a		n/a		n/a		6.73	
		08/08/2025	N	0.610		232		370		0.140		523		1820		6.48	
		09/05/2025	N	0.387		n/a		n/a		n/a		311		n/a		6.58	
Downgradient	MW-41	04/03/2023	N	0.0930		43.8		21.8		0.170		13.8		234		7.37	
		05/01/2023	N	n/a		207		500		n/a		71.6		1490		6.64	
		10/09/2023	N	0.0499		177		488		0.130		59.5		1300		6.53	
		03/01/2024	N	0.0696	U	177		481		0.140		57.1		1510		6.73	
		08/28/2024	N	0.0644		211		564		0.100		27.6		1400		6.83	
		02/28/2025	N	0.0950		149		242		0.140		40.4		780		7.01	
		03/26/2025	N	n/a		n/a		n/a		n/a		n/a		n/a		6.79	
		08/08/2025	N	0.154		127		88.3		0.230		169		840		6.62	
		09/05/2025	N	n/a		n/a		n/a		0.250		n/a		n/a		7.12	

Table 2-3
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			Analyte Group	NRG App III													
			Analyte	Boron		Calcium		Chloride		Fluoride		Sulfate		Total Dissolved Solids		pH, Field	
			Unit	mg/L		mg/L		mg/L		mg/L		mg/L		mg/L		su	
			Lab Method	SW6020A				E300		A4500-F C-11		E300		M2540C		NA	
Well Description	Well ID	Sample Date	Duplicate	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals
Downgradient	MW-63	04/03/2023	N	0.0991		303		333		< 0.100	U	606		1920		6.71	
		05/01/2023	N	n/a		335		n/a		n/a		735		n/a		6.73	
		10/09/2023	N	0.445		285		257		0.100		572		1490		6.41	
		11/01/2023	N	0.110		n/a		n/a		n/a		661		n/a		6.45	
		03/01/2024	N	0.628		180		128		0.200		370		968		6.78	
		03/29/2024	N	0.438		n/a		n/a		n/a		364		n/a		6.87	
		08/28/2024	N	0.267		257		208		0.130		571		1220		6.65	
		09/26/2024	N	0.262		n/a		n/a		n/a		609		n/a		6.60	
		02/28/2025	N	0.743		103		29.2		0.280		315		634		7.21	
		03/26/2025	N	0.842		n/a		n/a		0.860		n/a		n/a		6.98	
		08/08/2025	N	0.283		244		237		0.280		566		1380		6.40	
		09/05/2025	N	0.232		n/a		n/a		0.240		586		n/a		6.73	
	MW-64	04/03/2023	N	0.105		238		574		0.190		47.9		1940		6.71	
		10/09/2023	N	n/a		n/a		n/a		n/a		n/a		n/a		6.41	
		10/09/2023	N	0.0756		237		560		0.170		50.3		3130		n/a	
		11/01/2023	N	n/a		n/a		n/a		n/a		n/a		1620		6.48	
		03/01/2024	N	0.0939	U	262		548		0.190		52.8		1920		6.64	
		08/28/2024	N	0.0898		316		623		0.190		22.9		1680		6.64	
		09/26/2024	N	n/a		259		n/a		n/a		n/a		n/a		6.58	
		02/28/2025	N	0.0915		250		672		0.190		71.2		1920		6.52	
		08/08/2025	N	0.1000		270		605		0.300		55.5		1710		6.25	
		09/05/2025	N	n/a		n/a		n/a		0.330		n/a		n/a		6.62	
SWDA																	
Upgradient	MW-28D	04/03/2023	N	0.156		126		176		0.250		92.3		820		7.17	
		10/09/2023	N	0.139		118		142		0.280		95.6		590		7.14	
		03/01/2024	N	0.148		114		136		0.320		99.1		764		6.94	
		08/28/2024	N	0.133		151		200		0.240		94.1		768		7.10	
		02/28/2025	N	0.175		124		160		0.320		118		656		7.13	
		08/08/2025	N	0.166		110		139		0.350		99.8		744		6.80	
		09/05/2025	N	n/a		n/a		n/a		n/a		n/a		n/a		6.84	
	MW-42	04/03/2023	N	0.506		155		329		0.520		537		1680		6.99	
		10/09/2023	N	0.444		139		304		0.540		471		640		6.88	
		03/01/2024	N	0.553		161		307		0.610		544		1860		7.22	
		08/28/2024	N	0.488		158		336		0.540		648		1480		7.46	
		02/28/2025	N	0.520		151		329		0.630		548		1410		7.13	
		08/08/2025	N	0.499		145		319		0.600		488		1610		7.12	

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			Analyte Group	NRG App III													
			Analyte	Boron		Calcium		Chloride		Fluoride		Sulfate		Total Dissolved Solids		pH, Field	
			Unit	mg/L		mg/L		mg/L		mg/L		mg/L		mg/L		su	
			Lab Method	SW6020A				E300		A4500-F C-11		E300		M2540C		NA	
Well Description	Well ID	Sample Date	Duplicate	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals
Upgradient	MW-43	04/03/2023	N	0.397		91.5		234		0.500		72.4		804		7.19	
		10/09/2023	N	0.306		74.7		213		0.530		72.1		592		7.17	
		03/01/2024	N	0.366		85.6		218		0.590		76.3		868		7.26	
		08/28/2024	N	0.325		85.4		245		0.530		78.1		748		7.07	
		02/28/2025	N	0.365		86.0		239		0.610		87.0		764		7.25	
		08/08/2025	N	0.358		86.1		222		0.620		67.0		820		7.26	
	MW-47	04/03/2023	N	0.243		109		323		0.330		79.8		976		7.15	
		10/09/2023	N	0.224		113		297		0.360		76.6		800		6.94	
		03/01/2024	N	0.249		121		311		0.430		86.0		1030		6.93	
		08/28/2024	N	0.222		122		322		0.330		83.9		800		6.99	
		02/28/2025	N	0.264		115		326		0.450		95.3		872		7.03	
		08/08/2025	N	0.293		146		360		0.440		79.6		1150		7.32	
	MW-48	04/03/2023	N	0.583	[J]	82.4		390		0.610		95.5		1140		7.20	
		10/09/2023	N	0.735		74.5		365		0.660		95.5		940		6.90	
		11/01/2023	N	n/a		n/a		n/a		n/a		n/a		1140		7.06	
		03/01/2024	N	0.585		75.2		368		0.720		98.1		1080		7.03	
		03/29/2024	N	n/a		n/a		n/a		n/a		n/a		n/a		7.05	
		08/28/2024	N	0.507		73.6		427		0.660		80.8		988		6.92	
		02/28/2025	N	0.496		56.4		386		0.750		106		1060		7.03	
		08/08/2025	N	0.545		70.3		389		0.760		93.5		1160		7.21	
	MW-23R	04/03/2023	N	0.284		460		1080		0.250		1390		4460		6.84	
		05/01/2023	N	n/a		533		n/a		n/a		1670		4390		6.86	
		10/09/2023	N	0.284		502		993		0.280		1370		1450		6.86	
		11/01/2023	N	n/a		322		n/a		n/a		1540		n/a		6.60	
		03/01/2024	N	0.308		616		1050		0.300		1500		4020		6.96	
		03/29/2024	N	n/a		500		n/a		n/a		1430		3940		6.63	
		08/28/2024	N	0.256		583		2000		0.230		1620		2800		6.65	
		09/26/2024	N	n/a		503		1060		n/a		1640		n/a		6.53	
		02/28/2025	N	0.302		547		1040		0.320		1720		3920		6.89	
		03/26/2025	N	n/a		520		n/a		n/a		1510		3150		6.73	
		08/08/2025	N	0.275		523		966		0.350		1510		4560		6.84	
		09/05/2025	N	n/a		481		n/a		n/a		1530		2360		6.69	

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			Analyte Group	NRG App III													
			Analyte	Boron		Calcium		Chloride		Fluoride		Sulfate		Total Dissolved Solids		pH, Field	
			Unit	mg/L		mg/L		mg/L		mg/L		mg/L		mg/L		su	
			Lab Method	SW6020A				E300		A4500-F C-11		E300		M2540C		NA	
Well Description	Well ID	Sample Date	Duplicate	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals
Downgradient	MW-44	04/03/2023	FD	0.264		128		267		0.360		173		944		n/a	
		04/03/2023	N	0.312		138		269		0.370		178		1060		6.85	
		05/01/2023	N	n/a		n/a		n/a		n/a		n/a		n/a		6.97	
		10/09/2023	FD	0.226		98.0		205		0.420		93.7		748		n/a	
		10/09/2023	N	0.217		103		204		0.410		93.1		808		7.20	
		03/01/2024	FD	0.242		104		228		0.300	J	127		1070		n/a	
		03/01/2024	N	0.219		120		227		0.470	J	125		912		6.64	
		08/28/2024	FD	0.198		101		209		0.360		83.0		828		n/a	
		08/28/2024	N	0.174		97.4		226		0.380		97.2		732		7.08	
		02/28/2025	N	0.212		101		224		0.490		100		760		7.19	
		02/28/2025	FD	0.200		98.1		220		n/a		100		656		n/a	
		08/08/2025	N	0.191		104		216		0.470		83.0		836		7.03	
		08/08/2025	FD	0.191		99.6		209		0.460		81.3		836		n/a	
	MW-46R	04/03/2023	N	0.178		98.6		166		0.300		97.1		736		6.65	
		05/01/2023	N	n/a		n/a		n/a		n/a		n/a		n/a		7.15	
		10/09/2023	N	0.167		104		161		0.320		99.2		714		7.04	
		03/01/2024	N	0.185		120		167		0.370		101		804		6.13	
		03/29/2024	N	n/a		n/a		n/a		n/a		n/a		n/a		6.48	
		08/28/2024	N	0.154		108		187		0.280		98.4		688		7.03	
		02/28/2025	N	0.203		120		189		0.400		119		720		7.16	
		08/08/2025	N	0.178		109		182		0.400		100.0		764		6.93	
	MW-50	04/03/2023	N	0.293		143		411		0.380		141		1300		7.09	
		10/09/2023	N	0.292		133		391		0.460		150		976		6.79	
		11/01/2023	N	n/a		n/a		n/a		n/a		n/a		n/a		6.90	
		03/01/2024	N	0.254		134		389		0.510		139		1230		6.86	
		03/29/2024	N	n/a		n/a		n/a		n/a		n/a		n/a		6.61	
		08/28/2024	N	0.234		135		440		0.410		128		1070		6.82	
		09/26/2024	N	n/a		n/a		n/a		n/a		n/a		n/a		6.83	
		02/28/2025	N	0.295		137		413		0.530		163		1190		6.88	
		08/08/2025	N	0.236		118		393		0.540		139		1220		6.97	
	MW-52	04/03/2023	N	0.345		228		567		0.470		429		1350		7.02	
		10/09/2023	N	0.332		217		513		0.550		401		1420		6.72	
		11/01/2023	N	n/a		n/a		n/a		n/a		n/a		n/a		6.74	
		03/01/2024	N	0.292		202		533		0.380		438		2030		6.94	
		08/28/2024	N	0.322		251		553		0.500		449		1080		6.72	
		09/26/2024	N	n/a		n/a		n/a		n/a		n/a		n/a		6.79	
		02/28/2025	N	0.351		221		529		0.580		476		1680		6.77	
		03/26/2025	N	n/a		n/a		n/a		n/a		n/a		n/a		6.82	
		08/08/2025	N	0.333		224		508		0.620		425		1970		7.06	

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			Analyte Group	NRG App III													
			Analyte	Boron		Calcium		Chloride		Fluoride		Sulfate		Total Dissolved Solids		pH, Field	
			Unit	mg/L		mg/L		mg/L		mg/L		mg/L		mg/L		su	
			Lab Method	SW6020A				E300		A4500-F C-11		E300		M2540C		NA	
Well Description	Well ID	Sample Date	Duplicate	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals
Downgradient	MW-54	04/03/2023	N	0.278		106		280		0.400		81.3		756		7.07	
		10/09/2023	N	0.251		93.5		260		0.480		90.5		772		6.82	
		11/01/2023	N	n/a		n/a		n/a		n/a		n/a		n/a		6.99	
		03/01/2024	N	0.274		116		262		0.340		93.3		936		7.16	
		08/28/2024	N	0.240		106		282		0.400		81.3		884		7.02	
		02/28/2025	N	0.297		118		290		0.520		117		804		6.90	
		08/08/2025	N	0.257		106		260		0.510		100		1060		7.03	
	MW-55R	04/03/2023	N	0.406		112		336		0.610		105		948		7.07	
		10/09/2023	N	0.417		105		307		0.730		98.7		808		6.81	
		11/01/2023	N	n/a		n/a		n/a		n/a		n/a		n/a		6.98	
		03/01/2024	N	0.507		122		316		0.530		102		1160		6.94	
		08/28/2024	N	0.398		113		338		0.680		86.7		912		6.82	
		09/26/2024	N	n/a		n/a		n/a		n/a		n/a		n/a		6.92	
		02/28/2025	N	0.473		111		321		0.760		112		880		6.87	
		08/08/2025	N	0.444		109		314		0.780		93.2		992		7.12	
	MW-58	04/03/2023	N	0.373		114		316		0.370		97.6		1000		6.97	
		10/09/2023	N	0.935	[JL]	122		259		0.440		272		1160		7.12	
		11/01/2023	N	0.421		n/a		n/a		n/a		n/a		n/a		7.01	
		03/01/2024	N	0.336		107		281		0.330		94.4		1040		6.94	
		08/28/2024	N	0.301		99.8		294		0.390		70.9		828		7.21	
		02/28/2025	N	0.382		97.8		285		0.510		142		964		7.20	
		08/08/2025	N	1.29		158		270		0.430		409		1380		7.20	
		09/05/2025	N	3.30		n/a		n/a		n/a		n/a		n/a		7.10	
	MW-65	04/03/2023	N	0.320		199		318		0.280		614		2090		6.98	
		10/09/2023	N	0.306		196		314		0.350		604		1470		6.69	
		11/01/2023	N	n/a		n/a		n/a		n/a		n/a		n/a		6.84	
		03/01/2024	N	0.348		216		284		0.250		535		1870		6.83	
		03/29/2024	N	n/a		n/a		n/a		n/a		n/a		n/a		6.94	
		08/28/2024	N	0.299		267		371		0.240		677		1660		6.71	
		09/26/2024	N	n/a		n/a		n/a		n/a		775		n/a		6.76	
		02/28/2025	N	0.223		195		170		0.180		325		660		6.94	
		08/08/2025	N	0.306		204		339		0.420		551		1860		6.93	

Table 2-3
Summary of Groundwater Monitoring Data
2023 - 2025
WA Parish Electric Generating Station - Thompsons, Texas

			Analyte Group	**NRG App III**													
			Analyte	**Boron**		**Calcium**		**Chloride**		**Fluoride**		**Sulfate**		**Total Dissolved Solids**		**pH, Field**	
			Unit	**mg/L**		**mg/L**		**mg/L**		**mg/L**		**mg/L**		**mg/L**		**su**	
			Lab Method	**SW6020A**				**E300**		**A4500-F C-11**		**E300**		**M2540C**		**NA**	
Well Description	**Well ID**	**Sample Date**	**Duplicate**	**Result**	**Quals**	**Result**	**Quals**	**Result**	**Quals**	**Result**	**Quals**	**Result**	**Quals**	**Result**	**Quals**	**Result**	**Quals**
E Pond																	
Upgradient	MW-36	04/03/2023	N	0.0712		231		306		0.360		422		1480		6.88	
		04/03/2023	FD	0.0772		224		312		0.320		433		1770		n/a	
		10/09/2023	N	0.385		234		244		0.280		954		1750		6.87	
		10/09/2023	FD	0.343		219		245		0.230		964		1710		n/a	
		11/01/2023	FD	0.0682		232		306		0.390		476		964		n/a	
		11/01/2023	N	0.0672		218		300		0.360		468		1200		6.68	
		03/01/2024	N	0.0686	U	240		296		0.280		425		1470		6.83	
		03/01/2024	FD	0.0666	U	218		294		0.280		431		1410		n/a	
		08/28/2024	N	0.0482		252		318		0.340		441		1220		6.74	
		08/28/2024	FD	0.0818		205		311		0.320		436		1200		n/a	
		02/28/2025	N	0.0734		225		320		0.440		463		1280		6.90	
		02/28/2025	FD	0.0699		222		316		0.410		458		1080		n/a	
		08/08/2025	N	0.0688		229		299		0.470		410		1470		6.69	
		08/08/2025	FD	0.0674		208		304		0.410		404		1320		n/a	
	MW-60	04/03/2023	N	0.0891		217		312		0.120		290		1360		6.64	
		10/09/2023	N	0.0511		205		288		0.150		298		1070		6.65	
		03/01/2024	N	0.104		212		294		0.130		296		1330		6.56	
		08/28/2024	N	0.0875		218		310		0.100		327		1260		6.65	
		02/28/2025	N	0.0941		218		304		0.130		341		1180		6.56	
		08/08/2025	N	0.0866		205		297		0.180		312		1340		6.91	
Downgradient	MW-37	04/03/2023	N	0.383		239		256		0.210		916		2090		6.72	
		05/01/2023	N	0.389		n/a		n/a		n/a		1110		1930		6.69	
		10/09/2023	N	0.0720		223		278		0.400		413		932		6.85	
		11/01/2023	N	0.401		252		273		0.210		1130		1720		6.65	
		03/01/2024	N	0.479		280		252		0.190		1140		2330		5.61	
		03/29/2024	N	0.404		n/a		n/a		n/a		1140		1980		6.60	
		08/28/2024	N	0.458		289		243		0.180		1330		2120		6.18	
		09/26/2024	N	0.482		n/a		n/a		n/a		1400		1710		6.76	
		02/28/2025	N	0.508		315		239		0.260		1440		2260		6.75	
		03/26/2025	N	0.441		298		n/a		n/a		1280		1790		6.76	
		08/08/2025	N	0.517		280		215		0.300		1280		2620		6.57	
		09/05/2025	N	0.481		n/a		n/a		n/a		1300		2960		6.50	

Table 2-3
Summary of Groundwater Monitoring Data
2023 - 2025
WA Parish Electric Generating Station - Thompsons, Texas

			Analyte Group	NRG App III													
			Analyte	Boron		Calcium		Chloride		Fluoride		Sulfate		Total Dissolved Solids		pH, Field	
			Unit	mg/L		mg/L		mg/L		mg/L		mg/L		mg/L		su	
			Lab Method	SW6020A				E300		A4500-F C-11		E300		M2540C		NA	
Well Description	Well ID	Sample Date	Duplicate	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals	Result	Quals
Downgradient	MW-38R	04/03/2023	N	0.435		256		245		0.180		734		1690		6.54	
		05/01/2023	N	0.425		n/a		n/a		n/a		860		n/a		6.80	
		10/09/2023	N	0.416		238		243		0.230		650		1240		6.49	
		11/01/2023	N	0.406		n/a		n/a		n/a		738		n/a		6.65	
		03/01/2024	N	0.378		237		264		0.180		705		2000		6.44	
		03/29/2024	N	0.344		n/a		n/a		n/a		657		1460		6.57	
		08/28/2024	N	0.394		223		261		0.160		802		1580		6.63	
		09/26/2024	N	0.390		n/a		n/a		n/a		776		n/a		6.75	
		02/28/2025	N	0.372		244		281		0.210		777		1570		6.87	
		03/26/2025	N	0.365		n/a		n/a		n/a		675		n/a		6.80	
		08/08/2025	N	0.454		244		255		0.260		756		2110		6.62	
		09/05/2025	N	0.390		n/a		n/a		n/a		715		1650		6.64	
	MW-61	04/03/2023	N	1.10	[J]	239		122		0.230		1100		2060		6.86	
		05/01/2023	N	1.24		n/a		n/a		n/a		1330		1890		6.92	
		10/09/2023	N	0.987		227		119		0.280		1070		1720		6.93	
		11/01/2023	N	1.01		n/a		n/a		n/a		1190		n/a		6.79	
		03/01/2024	N	1.28		279		131		0.210		1160		2090		6.65	
		03/29/2024	N	5.24		n/a		n/a		n/a		1140		1730		6.61	
		08/28/2024	N	1.22		280		137		0.200		1310		1900		6.71	
		09/26/2024	N	1.13		n/a		n/a		n/a		1360		1940		6.83	
	MW-61R	02/28/2025	N	0.0085		225		303		0.170		771		2230		6.53	
		04/30/2025	N	n/a		n/a		n/a		n/a		626		1900		6.50	
		08/08/2025	N	0.0777		165		309		0.210		700		1980		6.46	
		09/05/2025	N	n/a		n/a		n/a		n/a		659		1940		6.49	

Notes
N: Normal Sample
FD: Field Duplicate
NA: Not Applicable
J: Concentration is an estimated value. Result is less than the method quantitation limit but ≥ to the method detection limit.
U: Analyte was not detected at or above the method detection limit.
JL: Estimated data - bias in sample, likely to be low.; the reported quantitation limit or sample concentration is approximated due to exceedance of one or more QC requirements.
JH: Estimated data - bias in sample, likely to be high; the reported quantitation limit or sample concentration is approximated due to exceedance of one or more QC requirements.
mg/L: Milligrams per liter
su: Standard units
n/a: Not analyzed

Table 2-3
Gauging Data and Groundwater Field Parameters
NRG - WA Parish Generating Station
Thompsons, Texas
February 28, 2025

Sample I.D.	Top of Casing Elev (ft-msl)	Depth to LNAPL (ft-toc)	Depth to Water (ft-toc)	LNAPL Thickness (ft)	DNAPL Thickness (ft)	Corrected GW Elev (ft-msl)	Water Column (ft)	Total Depth (ft-toc)	Screen Length (ft)	Sample Intake (ft-toc)	pH (S.U.)	Temp. (C)	S.C. (umhos)	D.O. (mg/L)	ORP (mV)	Turbidity (NTU)	Water Clarity
E Pond																	
Upgradient Wells:																	
MW-36	73.81	NP	7.71	0.00	0.00	66.10	34.52	42.23	10	38.23	6.90	22.1	2,200	2.0	95.1	5.3	Clear
MW-60	72.90	NP	6.21	0.00	0.00	66.69	31.34	37.55	10	32.55	6.56	21.3	2,158	2.3	93.5	5.2	Clear
Downgradient Wells:																	
MW-37	74.17	NP	11.19	0.00	0.00	62.98	32.69	43.88	10	38.51	6.75	24.1	3,180	2.8	53.6	7.3	Clear
MW-38R	73.68	NP	10.81	0.00	0.00	62.87	37.50	48.31	10	43.31	6.87	24.5	2,720	1.9	-11.5	4.0	Clear
MW-61R	74.86	NP	9.51	0.00	0.00	65.35	33.20	42.71	NR	37.71	6.53	25.1	4,360	2.1	63.6	>200	Cloudy
APH Pond																	
Upgradient Wells:																	
MW-39R	73.50	NP	11.43	0.00	0.00	62.07	26.66	38.09	10	33.10	7.05	22.9	1,906	3.4	38.5	4.4	Clear
MW-40	73.92	NP	10.72	0.00	0.00	63.20	29.92	40.64	10	35.64	6.58	24.9	2,650	3.4	430.2	3.6	Clear
MW-62	72.59	NP	9.61	0.00	0.00	62.98	33.30	42.91	10	37.96	6.83	22.4	2,410	3.5	20.5	4.2	Clear
Downgradient Wells:																	
MW-41	69.18	NP	6.18	0.00	0.00	63.00	33.48	39.66	10	34.62	7.01	23.5	640	4.5	38.7	5.7	Clear
MW-63	70.35	NP	7.70	0.00	0.00	62.65	28.47	36.17	10	31.11	7.21	23.3	1,067	3.3	36.7	5.5	Clear
MW-64	70.00	NP	6.90	0.00	0.00	63.10	33.49	40.39	10	35.44	6.52	24.1	2,610	3.0	26.1	4.0	Clear
SWDA Multiunit																	
Upgradient Wells:																	
MW-23R	67.01	NP	14.90	0.00	0.00	52.11	35.20	50.10	10	45.10	6.89	22.5	4,820	2.1	-50.4	8.7	Clear
MW-28D	70.37	NP	19.55	0.00	0.00	50.82	50.75	70.30	10	65.05	7.13	23.2	1,280	2.2	-117.3	6.1	Clear
MW-42	65.88	NP	15.00	0.00	0.00	50.88	33.01	48.01	10	42.99	7.13	22.4	2,210	2.4	-28.1	6.6	Clear
MW-43	66.67	NP	17.14	0.00	0.00	49.53	25.85	42.99	10	37.62	7.25	23.4	1,483	2.1	-63.1	7.9	Clear
MW-47	70.40	NP	22.85	0.00	0.00	47.55	35.10	57.95	10	52.90	7.03	22.7	2,000	1.6	-119.2	3.0	Clear
MW-48	65.89	NP	19.69	0.00	0.00	46.20	18.66	38.35	10	33.25	7.03	22.7	2,230	3.0	3.1	4.8	Clear
Downgradient Wells:																	
MW-44	68.05	NP	18.61	0.00	0.00	49.44	43.09	61.70	10	56.90	7.19	22.4	1,325	2.9	-83.1	7.7	Clear
MW-46R	67.92	NP	17.35	0.00	0.00	50.57	55.96	73.31	15	65.83	7.16	21.8	1,282	1.9	-89.8	19.2	Clear
MW-50	71.27	NP	29.24	0.00	0.00	42.03	34.32	63.56	10	58.45	6.88	22.8	2,010	1.0	-117.6	2.1	Clear
MW-52	67.91	NP	22.40	0.00	0.00	45.51	30.84	53.24	10	48.25	6.77	22.1	2,670	1.4	-85.2	3.1	Clear
MW-54	68.29	NP	26.49	0.00	0.00	41.80	36.66	63.15	10	58.10	6.90	21.7	1,510	2.1	-67.2	94.7	Sl. Cloudy
MW-55R	69.82	NP	27.22	0.00	0.00	42.60	21.30	48.52	15	41.00	6.87	21.9	1,611	2.0	-52.3	5.7	Clear
MW-58	65.40	NP	17.94	0.00	0.00	47.46	20.68	38.62	10	32.66	7.20	22.6	1,538	2.1	4.3	9.0	Clear
MW-65	66.65	NP	24.12	0.00	0.00	42.53	44.16	68.28	10	63.00	6.94	22.1	1,005	1.8	151.1	5.2	Clear

Notes:
NP = No product (LNAPL), NA = Not applicable, NS = Not sampled, NM = Not measured, NR = Not reported

Table 2-4
Gauging Data and Groundwater Field Parameters
NRG - WA Parish Generating Station
Thompsons, Texas
March 26 and April 30, 2025

Sample I.D.	Top of Casing Elev (ft-msl)	Depth to LNAPL (ft-toc)	Depth to Water (ft-toc)	LNAPL Thickness (ft)	DNAPL Thickness (ft)	Corrected GW Elev (ft-msl)	Water Column (ft)	Total Depth (ft-toc)	Screen Length (ft)	Sample Intake (ft-toc)	Well Inspection	pH (S.U.)	Temp. (C)	S.C. (umhos)	D.O. (mg/L)	ORP (mV)	Turbidity (NTU)	Water Clarity
E Pond																		
MW-37	74.17	NP	12.23	0.00	0.00	61.94	31.65	43.88	10	38.51	See form	6.76	24.1	3,080	2.5	101.2	7.1	Clear
MW-38R	73.68	NP	11.81	0.00	0.00	61.87	36.50	48.31	10	43.31	See form	6.80	24.5	2,200	1.6	-6.8	4.9	Clear
MW-61R	74.86	NP	10.68	0.00	0.00	64.18	32.03	42.71	10	37.71	See form	6.50	24.8	3,590	1.8	-63.7	6.7	Clear
APH Pond																		
MW-39R	73.50	NP	12.97	0.00	0.00	60.53	25.12	38.09	10	33.10	See form	6.73	24.0	2,420	2.6	62.7	2.7	Clear
MW-41	69.18	NP	8.10	0.00	0.00	61.08	31.56	39.66	10	34.62	See form	6.79	23.6	1,110	2.7	44.5	4.0	Clear
MW-63	70.35	NP	9.33	0.00	0.00	61.02	26.84	36.17	10	31.11	See form	6.98	23.2	1,368	1.4	-23.1	4.6	Clear
SWDA Multiunit																		
MW-23R	67.01	NP	15.21	0.00	0.00	51.80	34.89	50.10	10	45.10	See form	6.73	22.1	5,400	1.3	-94.8	6.1	Clear
MW-52	67.91	NP	22.56	0.00	0.00	45.35	30.68	53.24	10	48.25	See form	6.82	23.2	2,840	1.6	-103.4	3.4	Clear

Notes:
NP = No product (LNAPL), NA = Not applicable, NS = Not sampled, NM = Not measured, NR = Not reported
MW-61R was not accessible due to construction activities during the March 26, 2025 resampling event and was resampled on April 30, 2025.

Table 2-5
Gauging Data and Groundwater Field Parameters
NRG - WA Parish Generating Station
Thompsons, Texas
August 08, 2025

Sample I.D.	Top of Casing Elev (ft-msl)	Depth to LNAPL (ft-toc)	Depth to Water (ft-toc)	LNAPL Thickness (ft)	DNAPL Thickness (ft)	Corrected GW Elev (ft-msl)	Water Column (ft)	Total Depth (ft-toc)	Screen Length (ft)	Sample Intake (ft-toc)	pH (S.U.)	Temp. (C)	S.C. (umhos)	D.O. (mg/L)	ORP (mV)	Turbidity (NTU)	Water Clarity
E Pond																	
Upgradient Wells:																	
MW-36	73.81	NP	8.28	0.00	0.00	65.53	33.95	42.23	10	38.23	6.69	28.2	1,671	1.8	139.3	4.2	Clear
MW-60	72.90	NP	6.88	0.00	0.00	66.02	30.67	37.55	10	32.55	6.91	26.6	1,801	3.4	180.9	6.4	Clear
Downgradient Wells:																	
MW-37	74.17	NP	12.07	0.00	0.00	62.10	31.81	43.88	10	38.51	6.57	29.2	3,160	1.7	66.9	9.1	Clear
MW-38R	73.68	NP	11.71	0.00	0.00	61.97	36.60	48.31	10	43.31	6.62	29.3	2,530	1.4	-43.2	4.8	Clear
MW-61R	74.98	NP	10.48	0.00	0.00	64.50	32.23	42.71	NR	37.71	6.46	29.8	2,290	2.0	-53.8	5.3	Clear
APH Pond																	
Upgradient Wells:																	
MW-39R	73.50	NP	13.42	0.00	0.00	60.08	24.67	38.09	10	33.10	6.48	24.6	3,010	3.6	90.3	4.3	Clear
MW-40	73.92	NP	13.49	0.00	0.00	60.43	27.15	40.64	10	35.64	6.26	26.7	3,030	1.7	90.1	3.5	Clear
MW-62	72.59	NP	11.83	0.00	0.00	60.76	31.08	42.91	10	37.96	6.39	25.8	2,810	2.1	64.0	4.1	Clear
Downgradient Wells:																	
MW-41	69.18	NP	8.90	0.00	0.00	60.28	30.76	39.66	10	34.62	6.62	24.9	1,226	1.0	13.6	4.3	Clear
MW-63	70.35	NP	9.92	0.00	0.00	60.43	26.25	36.17	10	31.11	6.40	25.1	2,230	1.3	6.7	4.8	Clear
MW-64	70.00	NP	9.91	0.00	0.00	60.09	30.48	40.39	10	35.44	6.25	25.8	2,930	1.4	108.6	5.3	Clear
SWDA Multiunit																	
Upgradient Wells:																	
MW-23R	67.01	NP	14.96	0.00	0.00	52.05	35.14	50.10	10	45.10	6.84	24.3	3,260	3.7	-75.1	7.1	Clear
MW-28D	70.37	NP	19.61	0.00	0.00	50.76	50.69	70.30	10	65.05	6.80	24.1	1,064	1.1	-106.9	4.6	Clear
MW-42	65.88	NP	15.10	0.00	0.00	50.78	32.91	48.01	10	42.99	7.12	24.2	2,030	3.3	-51.5	4.7	Clear
MW-43	66.67	NP	17.04	0.00	0.00	49.63	25.95	42.99	10	37.62	7.26	24.3	1,424	2.5	-76.1	2.5	Clear
MW-47	70.40	NP	22.58	0.00	0.00	47.82	35.37	57.95	10	52.90	7.32	25.3	1,681	2.0	-142.7	3.7	Clear
MW-48	65.89	NP	19.24	0.00	0.00	46.65	19.11	38.35	10	33.25	7.21	25.4	1,495	3.1	28.4	5.3	Clear
Downgradient Wells:																	
MW-44	68.05	NP	18.68	0.00	0.00	49.37	43.02	61.70	10	56.90	7.03	23.7	764	2.3	-97.9	2.0	Clear
MW-46R	67.92	NP	17.50	0.00	0.00	50.42	55.81	73.31	15	65.83	6.93	22.4	1,105	2.3	-108.2	4.4	Clear
MW-50	71.27	NP	28.49	0.00	0.00	42.78	35.07	63.56	10	58.45	6.97	26.6	2,140	1.3	-105.4	3.6	Clear
MW-52	67.91	NP	21.96	0.00	0.00	45.95	31.28	53.24	10	48.25	7.06	25.5	2,720	1.3	-82.0	3.8	Clear
MW-54	68.29	NP	25.78	0.00	0.00	42.51	37.37	63.15	10	58.10	7.03	24.3	1,397	2.5	-105.2	141.2	Cloudy
MW-55R	69.82	NP	26.69	0.00	0.00	43.13	21.83	48.52	15	41.00	7.12	24.5	1,533	2.4	-66.0	7.2	Clear
MW-58	65.40	NP	17.78	0.00	0.00	47.62	20.84	38.62	10	32.66	7.20	24.1	934	2.8	15.1	11.7	Clear
MW-65	66.65	NP	23.89	0.00	0.00	42.76	44.39	68.28	10	63.00	6.93	25.0	2,140	2.0	43.5	6.1	Clear

Notes:
NP = No product (LNAPL), NA = Not applicable, NS = Not sampled, NM = Not measured, NR = Not reported

Table 2-6
Gauging Data and Groundwater Field Parameters
NRG - WA Parish Generating Station
Thompsons, Texas
September 5, 2025

Sample I.D.	Top of Casing Elev (ft-msl)	Depth to LNAPL (ft-toc)	Depth to Water (ft-toc)	LNAPL Thickness (ft)	DNAPL Thickness (ft)	Corrected GW Elev (ft-msl)	Water Column (ft)	Total Depth (ft-toc)	Screen Length (ft)	Sample Intake (ft-toc)	pH (S.U.)	Temp. (C)	S.C. (umhos)	D.O. (mg/L)	ORP (mV)	Turbidity (NTU)	Water Clarity
E Pond																	
MW-37	74.17	NP	12.55	0.00	0.00	61.62	31.33	43.88	10	38.51	6.50	25.3	3,380	2.0	80.9	8.7	Clear
MW-38R	73.68	NP	12.21	0.00	0.00	61.47	36.10	48.31	10	43.31	6.64	25.5	2,690	1.9	-28.6	5.3	Clear
MW-61R	74.86	NP	10.97	0.00	0.00	63.89	31.74	42.71	NR	37.71	6.49	25.5	3,320	2.1	-61.8	6.2	Clear
APH Pond																	
MW-39R	73.50	NP	14.13	0.00	0.00	59.37	23.96	38.09	10	33.10	6.58	25.0	2,150	3.4	144.5	5.0	Clear
MW-40	73.92	NP	14.14	0.00	0.00	59.78	26.50	40.64	10	35.64	6.44	26.1	2,420	2.2	152.9	6.0	Clear
MW-41	69.18	NP	9.63	0.00	0.00	59.55	30.03	39.66	10	34.62	7.12	22.8	683	1.7	79.4	5.5	Clear
MW-62	72.59	NP	12.42	0.00	0.00	60.17	30.49	42.91	10	37.96	6.55	25.1	2,270	2.2	141.7	3.2	Clear
MW-63	70.35	NP	10.65	0.00	0.00	59.70	25.52	36.17	10	31.11	6.73	23.1	1,393	1.9	-15.8	4.0	Clear
MW-64	70.00	NP	10.58	0.00	0.00	59.42	29.81	40.39	10	35.44	6.62	22.2	1,556	2.3	141.5	4.7	Clear
SWDA Multiunit																	
MW-23R	67.01	NP	15.27	0.00	0.00	51.74	34.83	50.10	10	45.10	6.69	23.4	5,180	3.5	-48.1	7.4	Clear
MW-28D	70.37	NP	20.18	0.00	0.00	50.19	50.12	70.30	10	65.05	6.84	23.9	1,145	1.4	-120.2	5.4	Clear
MW-58	65.40	NP	18.03	0.00	0.00	47.37	20.59	38.62	10	32.66	7.10	27.8	2,809	2.7	69.8	9.7	Clear

Notes:
NP = No product (LNAPL), NA = Not applicable, NS = Not sampled, NM = Not measured, NR = Not reported

Appendix A

Detection Monitoring Data
(February 2025)

10450 Stancliff Rd. Suite 210
Houston, TX 77099
T: +1 281 530 5656
F: +1 281 530 5887

March 10, 2025

Lori Burris
TRC
11767 Katy Freeway
Suite 230
Houston, TX 77079

Work Order: **HS25030029**

Laboratory Results for: **NRG - CCR Program-APP III**

Dear Lori Burris,

ALS Environmental received 28 sample(s) on Feb 28, 2025 for the analysis presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Generated By: JUMOKE.LAWAL

Andy C. Neir

Client:	TRC	**TRRP Laboratory Data Package Cover Page**
Project:	NRG - CCR Program-APP III	
WorkOrder:	**HS25030029**	

This data package consists of all or some of the following as applicable:

This signature page, the laboratory review checklist, and the following reportable data:

R1 Field chain-of-custody documentation;

R2 Sample identification cross-reference;

R3 Test reports (analytical data sheets) for each environmental sample that includes:
a) Items consistent with NELAC Chapter 5,
b) dilution factors,
c) preparation methods,
d) cleanup methods, and
e) if required for the project, tentatively identified compounds (TICs).

R4 Surrogate recovery data including:
a) Calculated recovery (%R), and
b) The laboratory's surrogate QC limits.

R5 Test reports/summary forms for blank samples;

R6 Test reports/summary forms for laboratory control samples (LCSs) including:
a) LCS spiking amounts,
b) Calculated %R for each analyte, and
c)The laboratory's LCS QC limits.

R7 Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
a) Samples associated with the MS/MSD clearly identified,
b) MS/MSD spiking amounts,
c) Concentration of each MS/MSD analyte measured in the parent and spiked samples,
d) Calculated %Rs and relative percent differences (RPDs), and
e) The laboratory's MS/MSD QC limits.

R8 Laboratory analytical duplicate (if applicable) recovery and precision:
a) the amount of analyte measured in the duplicate,
b) the calculated RPD, and
c) the laboratory's QC limits for analytical duplicates.

R9 List of method quantitation limits (MQLs) and detectability check sample results for each analyte for each method and matrix.

R10 Other problems or anomalies.
The Exception Report for each "No" or "Not Reviewed (NR)" item in Laboratory Review Checklist and for each analyte, matrix, and method for which the laboratory does not hold NELAC accreditation under the Texas Laboratory Accreditation Program.

Client:	TRC	**TRRP Laboratory Data Package Cover Page**
Project:	NRG - CCR Program-APP III	
WorkOrder:	**HS25030029**	

Release Statement: I am responsible for the release of this laboratory data package. This laboratory is NELAC accredited under the Texas Laboratory Accreditation Program for all the methods, analytes and matrices reported in this data package except as noted in the Exception Reports. The data have been reviewed and are technically compliant with the requirements of the methods used, except where noted by the laboratory in the attached exception reports. By my signature below, I affirm to the best of my knowledge, all problems/anomalies, observed by the laboratory have been identified by the laboratory in the Laboratory Review Checklist, and no information affecting the quality of the data has been knowingly withheld.

Check, if applicable: [NA] This laboratory meets an exception under 30 TAC §25.6 and was last inspected by [ ] TCEQ or [ ] _______________ on (enter date of last inspection). Any findings affecting the data in this laboratory data package are noted in the Exception Reports herein. The official signing the cover page of the report in which these data are used is responsible for releasing this data package and is by signature affirming the above release statement is true.

Andy C. Neir

Laboratory Review Checklist: Reportable Data							
Laboratory Name: ALS Laboratory Group			LRC Date: 03/10/2025				
Project Name: NRG - CCR Program-APP III			Laboratory Job Number: HS25030029				
Reviewer Name: Andy Neir			Prep Batch Number(s): 224887,224893,224902,R507896,R507897,R508121,R508222,R508232, R508380				
#[1]	A[2]	Description	Yes	No	NA[3]	NR[4]	ER#[5]
R1	OI	**Chain-of-custody (C-O-C)**					
		Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?	X				
		Were all departures from standard conditions described in an exception report?	X				
R2	OI	**Sample and quality control (QC) identification**					
		Are all field sample ID numbers cross-referenced to the laboratory ID numbers?	X				
		Are all laboratory ID numbers cross-referenced to the corresponding QC data?	X				
R3	OI	**Test reports**					
		Were all samples prepared and analyzed within holding times?	X				
		Other than those results < MQL, were all other raw values bracketed by calibration standards?	X				
		Were calculations checked by a peer or supervisor?	X				
		Were all analyte identifications checked by a peer or supervisor?	X				
		Were sample detection limits reported for all analytes not detected?	X				
		Were all results for soil and sediment samples reported on a dry weight basis?			X		
		Were % moisture (or solids) reported for all soil and sediment samples?			X		
		Were bulk soils/solids samples for volatile analysis extracted with methanol per SW-846 Method 5035?			X		
		If required for the project, TICs reported?			X		
R4	O	**Surrogate recovery data**					
		Were surrogates added prior to extraction?			X		
		Were surrogate percent recoveries in all samples within the laboratory QC limits?			X		
R5	OI	**Test reports/summary forms for blank samples**					
		Were appropriate type(s) of blanks analyzed?	X				
		Were blanks analyzed at the appropriate frequency?	X				
		Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X				
		Were blank concentrations < MQL?	X				
R6	OI	**Laboratory control samples (LCS):**					
		Were all COCs included in the LCS?	X				
		Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X				
		Were LCSs analyzed at the required frequency?	X				
		Were LCS (and LCSD, if applicable) %Rs within the laboratory QC limits?	X				
		Does the detectability data document the laboratory's capability to detect the COCs at the MDL used to calculate the SDLs?	X				
		Was the LCSD RPD within QC limits?	X				
R7	OI	**Matrix spike (MS) and matrix spike duplicate (MSD) data**					
		Were the project/method specified analytes included in the MS and MSD?	X				
		Were MS/MSD analyzed at the appropriate frequency?	X				
		Were MS (and MSD, if applicable) %Rs within the laboratory QC limits?		X			1
		Were MS/MSD RPDs within laboratory QC limits?	X				
R8	OI	**Analytical duplicate data**					
		Were appropriate analytical duplicates analyzed for each matrix?	X				
		Were analytical duplicates analyzed at the appropriate frequency?	X				
		Were RPDs or relative standard deviations within the laboratory QC limits?	X				
R9	OI	**Method quantitation limits (MQLs):**					
		Are the MQLs for each method analyte included in the laboratory data package?	X				
		Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X				
		Are unadjusted MQLs and DCSs included in the laboratory data package?	X				
R10	OI	**Other problems/anomalies**					
		Are all known problems/anomalies/special conditions noted in this LRC and ER?	X				
		Were all necessary corrective actions performed for the reported data?	X				
		Was applicable and available technology used to lower the SDL and minimize the matrix interference affects on the sample results?	X				
		Is the laboratory NELAC-accredited under the Texas Laboratory Program for the analytes, matrices and methods associated with this laboratory data package?	X				

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);NA = Not Applicable; NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

Laboratory Review Checklist: Supporting Data

Laboratory Name: ALS Laboratory Group	LRC Date: 03/10/2025
Project Name: NRG - CCR Program-APP III	Laboratory Job Number: HS25030029
Reviewer Name: Andy Neir	Prep Batch Number(s): 224887,224893,224902,R507896,R507897,R508121,R508222,R508232,R508380

#[1]	A[2]	Description	Yes	No	NA[3]	NR[4]	ER#[5]
S1	OI	**Initial calibration (ICAL)**					
		Were response factors and/or relative response factors for each analyte within QC limits?	X				
		Were percent RSDs or correlation coefficient criteria met?	X				
		Was the number of standards recommended in the method used for all analytes?	X				
		Were all points generated between the lowest and highest standard used to calculate the curve?	X				
		Are ICAL data available for all instruments used?	X				
		Has the initial calibration curve been verified using an appropriate second source standard?	X				
S2	OI	**Initial and continuing calibration verification (ICCV and CCV) and continuing calibration blank (CCB)**					
		Was the CCV analyzed at the method-required frequency?	X				
		Were percent differences for each analyte within the method-required QC limits?	X				
		Was the ICAL curve verified for each analyte?	X				
		Was the absolute value of the analyte concentration in the inorganic CCB < MDL?		X			2
S3	O	**Mass spectral tuning:**					
		Was the appropriate compound for the method used for tuning?	X				
		Were ion abundance data within the method-required QC limits?	X				
S4	O	**Internal standards (IS):**					
		Were IS area counts and retention times within the method-required QC limits?	X				
S5	OI	**Raw data** (NELAC section 1 appendix A glossary, and section 5.12 or ISO/IEC 17025 section					
		Were the raw data (for example, chromatograms, spectral data) reviewed by an analyst?	X				
		Were data associated with manual integrations flagged on the raw data?	X				
S6	O	**Dual column confirmation**					
		Did dual column confirmation results meet the method-required QC?			X		
S7	O	**Tentatively identified compounds (TICs):**					
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X		
S8	I	**Interference Check Sample (ICS) results:**					
		Were percent recoveries within method QC limits?	X				
S9	I	**Serial dilutions, post digestion spikes, and method of standard additions**					
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?	X				
S10	OI	**Method detection limit (MDL) studies**					
		Was a MDL study performed for each reported analyte?	X				
		Is the MDL either adjusted or supported by the analysis of DCSs?	X				
S11	OI	**Proficiency test reports:**					
		Was the laboratory's performance acceptable on the applicable proficiency tests or evaluation studies?	X				
S12	OI	**Standards documentation**					
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X				
S13	OI	**Compound/analyte identification procedures**					
		Are the procedures for compound/analyte identification documented?	X				
S14	OI	**Demonstration of analyst competency (DOC)**					
		Was DOC conducted consistent with NELAC Chapter 5C or ISO/IEC 4?	X				
		Is documentation of the analyst's competency up-to-date and on file?	X				
S15	OI	**Verification/validation documentation for methods** (NELAC Chap 5 or ISO/IEC 17025 Section 5)					
		Are all the methods used to generate the data documented, verified, and validated, where applicable?	X				
S16	OI	**Laboratory standard operating procedures (SOPs):**					
		Are laboratory SOPs current and on file for each method performed?	X				

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);
NA = Not Applicable; NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

Laboratory Review Checklist: Exception Reports	
Laboratory Name: ALS Laboratory Group	LRC Date: 03/10/2025
Project Name: NRG - CCR Program-APP III	Laboratory Job Number: HS25030029
Reviewer Name: Andy Neir	Prep Batch Number(s): 224887,224893,224902,R507896,R507897,R508121,R508222,R508232,R508380

ER#[5]	Description
1	Batch 224887, Metals Method SW6020, sample HS25030018-01, MS and MSD were performed on unrelated sample Batch 224893, Metals Method SW6020, sample MW-63, MS and or MSD recovered outside the control limit for Calcium, however, the result in the parent sample is 4x greater than the spike amount Batch 224902, Metals Method SW6020, sample HS25030030-02, MS and MSD were performed on unrelated sample Batch 224902, Metals Method SW6020, sample MW-58, MS and or MSD recovered outside the control limit for Calcium, however, the result in the parent sample is 4x greater than the spike amount Batch R507897, Anions Method E300, sample MW-42, MS and or MSD recovered outside the control limit for Sulfate, however, the result in the parent sample is 4x greater than the spike amount
2	See Run Log and CCB Exceptions Report.

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);
NA = Not Applicable;
NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

FORM 13 - ANALYSIS RUN LOG

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029
Start Date: 05-Mar-2025 End Date: 06-Mar-2025

Run ID:ICPMS07_508085
Instrument:ICPMS07
Method:SW6020A

Sample No.	D/F	Time	FileID	Analytes
LLICV5	1	05-Mar-2025 20:40	019LCV5.d	B CA
LLICV2	1	05-Mar-2025 20:42	020LCV2.d	B CA
ICV	1	05-Mar-2025 20:45	021_ICV.d	B CA
ICB	1	05-Mar-2025 20:47	022_ICB.d	B CA
ICSA	1	05-Mar-2025 20:52	024ICSA.d	B CA
ICSAB	1	05-Mar-2025 20:54	025ICSB.d	B CA
CCV 1	1	05-Mar-2025 21:16	029_CCV.d	B CA
CCB 1	1	05-Mar-2025 21:19	030_CCB.d	B CA
CCB 2	1	05-Mar-2025 21:47	042_CCB.d	B CA
CCV 2	1	05-Mar-2025 21:52	044_CCV.d	B CA
CCV 3	1	05-Mar-2025 22:10	052_CCV.d	B CA
CCB 3	1	05-Mar-2025 22:13	053_CCB.d	B CA
MBLK-224887	1	05-Mar-2025 22:15	054SMPL.d	B CA
LCS-224887	1	05-Mar-2025 22:17	055SMPL.d	B CA
ZZZZZZSD	5	05-Mar-2025 22:20	056SMPL.d	B CA
ZZZZZZMS	1	05-Mar-2025 22:27	059SMPL.d	B CA
ZZZZZZMSD	1	05-Mar-2025 22:29	060SMPL.d	B CA
ZZZZZZPDS	1	05-Mar-2025 22:31	061SMPL.d	B CA
CCV 4	1	05-Mar-2025 22:36	063_CCV.d	B CA
CCB 4	1	05-Mar-2025 22:38	064_CCB.d	B CA
CCV 5	1	05-Mar-2025 22:52	070_CCV.d	B CA
CCB 5	1	05-Mar-2025 22:55	071_CCB.d	B CA
MW-23R	1	05-Mar-2025 22:57	072SMPL.d	B
MW-28D	1	05-Mar-2025 23:00	073SMPL.d	B CA
MW-42	1	05-Mar-2025 23:02	074SMPL.d	B CA
MW-43	1	05-Mar-2025 23:04	075SMPL.d	B CA
MW-44	1	05-Mar-2025 23:07	076SMPL.d	B CA
MW-46R	1	05-Mar-2025 23:09	077SMPL.d	B CA
MW-47	1	05-Mar-2025 23:11	078SMPL.d	B CA
CCV 6	1	05-Mar-2025 23:16	080_CCV.d	B CA
CCB 6	1	05-Mar-2025 23:18	081_CCB.d	B CA
MW-48	1	05-Mar-2025 23:21	082SMPL.d	B CA
MW-50	1	05-Mar-2025 23:23	083SMPL.d	B CA
MW-52	1	05-Mar-2025 23:25	084SMPL.d	B
MW-54	1	05-Mar-2025 23:28	085SMPL.d	B CA
MW-55R	1	05-Mar-2025 23:30	086SMPL.d	B CA
MW-65	1	05-Mar-2025 23:32	087SMPL.d	B
MW-36	1	05-Mar-2025 23:35	088SMPL.d	B
CCV 7	1	05-Mar-2025 23:39	090_CCV.d	B CA
CCB 7	1	05-Mar-2025 23:42	091_CCB.d	B CA
LCS-224902	1	05-Mar-2025 23:47	093SMPL.d	B CA
MW-58	1	05-Mar-2025 23:49	094SMPL.d	B CA
MW-58SD	5	05-Mar-2025 23:51	095SMPL.d	B CA
MW-58MS	1	05-Mar-2025 23:54	096SMPL.d	B CA
MW-58MSD	1	05-Mar-2025 23:56	097SMPL.d	B CA
MW-58PDS	1	05-Mar-2025 23:58	098SMPL.d	B CA
CCV 8	1	06-Mar-2025 00:01	099_CCV.d	B CA
CCB 8	1	06-Mar-2025 00:03	100_CCB.d	B CA
MW-37	1	06-Mar-2025 00:10	103SMPL.d	B
MW-38R	1	06-Mar-2025 00:13	104SMPL.d	B

FORM 13 - ANALYSIS RUN LOG

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029
Start Date: 05-Mar-2025 End Date: 06-Mar-2025

Run ID:ICPMS07_508085
Instrument:ICPMS07
Method:SW6020A

Sample No.	D/F	Time	FileID	Analytes
MW-60	1	06-Mar-2025 00:15	105SMPL.d	B
MW-61R	1	06-Mar-2025 00:17	106SMPL.d	B
FIELD BLANK	1	06-Mar-2025 00:20	107SMPL.d	B CA
FIELD DUPLICATE 1	1	06-Mar-2025 00:22	108SMPL.d	B
FIELD DUPLICATE 2	1	06-Mar-2025 00:24	109SMPL.d	B CA
CCV 9	1	06-Mar-2025 00:29	111_CCV.d	B CA
CCB 9	1	06-Mar-2025 00:31	112_CCB.d	B CA
ZZZZZZSD	5	06-Mar-2025 00:36	114SMPL.d	
ZZZZZZMS	1	06-Mar-2025 00:39	115SMPL.d	B CA
ZZZZZZMSD	1	06-Mar-2025 00:43	117SMPL.d	B CA
ZZZZZZPDS	1	06-Mar-2025 00:46	118SMPL.d	
CCV 10	1	06-Mar-2025 00:50	120_CCV.d	B CA
CCB 10	1	06-Mar-2025 00:53	121_CCB.d	B CA
CCV 11	1	06-Mar-2025 01:11	129_CCV.d	B CA
CCB 11	1	06-Mar-2025 01:14	130_CCB.d	B CA
CCV 12	1	06-Mar-2025 01:35	139_CCV.d	B CA
CCB 12	1	06-Mar-2025 01:37	140_CCB.d	B CA
CCV 13	1	06-Mar-2025 01:58	149_CCV.d	B CA
CCB 13	1	06-Mar-2025 02:01	150_CCB.d	B CA
LLCCV2	1	06-Mar-2025 02:05	152LCV2.d	B CA
LLCCV5	1	06-Mar-2025 02:08	153LCV5.d	B CA
ICSA	1	06-Mar-2025 02:10	154ICSA.d	B CA
ICSAB	1	06-Mar-2025 02:12	155ICSB.d	B CA

CCB EXCEPTIONS REPORT

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

Run ID:ICPMS07_508085
Instrument:ICPMS07
Method:SW6020A

CCB 10	Date: 06-Mar-2025 00:53	Seq: 8709263	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	16.83	11	20

CCB 11	Date: 06-Mar-2025 01:14	Seq: 8709221	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	23.33	11	20

CCB 12	Date: 06-Mar-2025 01:37	Seq: 8709231	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	12.47	11	20

Client: TRC
Project: NRG - CCR Program-APP III
Work Order: HS25030029

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS25030029-01	MW-39R	Water		28-Feb-2025 08:25	28-Feb-2025 14:00	☐
HS25030029-02	MW-40	Water		28-Feb-2025 11:20	28-Feb-2025 14:00	☐
HS25030029-03	MW-41	Water		28-Feb-2025 10:10	28-Feb-2025 14:00	☐
HS25030029-04	MW-62	Water		28-Feb-2025 09:00	28-Feb-2025 14:00	☐
HS25030029-05	MW-63	Water		28-Feb-2025 09:35	28-Feb-2025 14:00	☐
HS25030029-06	MW-64	Water		28-Feb-2025 10:45	28-Feb-2025 14:00	☐
HS25030029-07	MW-23R	Water		28-Feb-2025 11:45	28-Feb-2025 14:00	☐
HS25030029-08	MW-28D	Water		28-Feb-2025 11:10	28-Feb-2025 14:00	☐
HS25030029-09	MW-42	Water		28-Feb-2025 11:05	28-Feb-2025 14:00	☐
HS25030029-10	MW-43	Water		28-Feb-2025 12:35	28-Feb-2025 14:00	☐
HS25030029-11	MW-44	Water		28-Feb-2025 08:55	28-Feb-2025 14:00	☐
HS25030029-12	MW-46R	Water		28-Feb-2025 07:55	28-Feb-2025 14:00	☐
HS25030029-13	MW-47	Water		28-Feb-2025 11:25	28-Feb-2025 14:00	☐
HS25030029-14	MW-48	Water		28-Feb-2025 10:40	28-Feb-2025 14:00	☐
HS25030029-15	MW-50	Water		28-Feb-2025 10:35	28-Feb-2025 14:00	☐
HS25030029-16	MW-52	Water		28-Feb-2025 09:45	28-Feb-2025 14:00	☐
HS25030029-17	MW-54	Water		28-Feb-2025 08:10	28-Feb-2025 14:00	☐
HS25030029-18	MW-55R	Water		28-Feb-2025 09:05	28-Feb-2025 14:00	☐
HS25030029-19	MW-58	Water		28-Feb-2025 09:55	28-Feb-2025 14:00	☐
HS25030029-20	MW-65	Water		28-Feb-2025 09:50	28-Feb-2025 14:00	☐
HS25030029-21	MW-36	Water		28-Feb-2025 09:00	28-Feb-2025 14:00	☐
HS25030029-22	MW-37	Water		28-Feb-2025 10:40	28-Feb-2025 14:00	☐
HS25030029-23	MW-38R	Water		28-Feb-2025 09:55	28-Feb-2025 14:00	☐
HS25030029-24	MW-60	Water		28-Feb-2025 08:15	28-Feb-2025 14:00	☐
HS25030029-25	MW-61R	Water		28-Feb-2025 11:35	28-Feb-2025 14:00	☐
HS25030029-26	FIELD BLANK	Water		28-Feb-2025 11:50	28-Feb-2025 14:00	☐

Client: TRC
Project: NRG - CCR Program-APP III
Work Order: HS25030029

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS25030029-27	FIELD DUPLICATE 1	Water		28-Feb-2025 11:00	28-Feb-2025 14:00	☐
HS25030029-28	FIELD DUPLICATE 2	Water		28-Feb-2025 09:00	28-Feb-2025 14:00	☐

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-39R		Lab ID:HS25030029-01
Collection Date:	28-Feb-2025 08:25		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: MSC
Boron	**0.204**		**0.0110**	**0.0200**	**mg/L**	1	03-Mar-2025 15:04
Calcium	**169**		**0.0340**	**0.500**	**mg/L**	1	03-Mar-2025 15:04
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**321**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 09:42
Sulfate	**212**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 09:42
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**992**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-40		Lab ID:HS25030029-02
Collection Date:	28-Feb-2025 11:20		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: MSC
Boron	**0.0936**		**0.0110**	**0.0200**	**mg/L**	1	03-Mar-2025 15:07
Calcium	**258**		**3.40**	**50.0**	**mg/L**	100	03-Mar-2025 16:15
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**536**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 09:48
Sulfate	**118**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 09:48
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**1,460**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-41		Lab ID:HS25030029-03
Collection Date:	28-Feb-2025 10:10		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: MSC
Boron	**0.0950**		**0.0110**	**0.0200**	**mg/L**	1	03-Mar-2025 15:09
Calcium	**149**		**0.0340**	**0.500**	**mg/L**	1	03-Mar-2025 15:09
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**242**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 09:54
Sulfate	**40.4**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 09:54
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**780**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-62		Lab ID:HS25030029-04
Collection Date:	28-Feb-2025 09:00		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: MSC
Boron	**0.0795**		**0.0110**	**0.0200**	**mg/L**	1	03-Mar-2025 15:11
Calcium	**168**		**0.0340**	**0.500**	**mg/L**	1	03-Mar-2025 15:11
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**519**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 10:00
Sulfate	**163**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 10:00
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**930**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-63		Lab ID:HS25030029-05
Collection Date:	28-Feb-2025 09:35		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: MSC
Boron	**0.743**		**0.110**	**0.200**	**mg/L**	10	03-Mar-2025 15:18
Calcium	**103**		**0.0340**	**0.500**	**mg/L**	1	03-Mar-2025 14:36
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**29.2**		**0.200**	**0.500**	**mg/L**	1	03-Mar-2025 10:29
Sulfate	**315**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 10:53
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**634**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-64		Lab ID:HS25030029-06
Collection Date:	28-Feb-2025 10:45		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: MSC
Boron	**0.0915**		**0.0110**	**0.0200**	**mg/L**	1	03-Mar-2025 15:14
Calcium	**250**		**3.40**	**50.0**	**mg/L**	100	03-Mar-2025 16:17
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**672**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 10:35
Sulfate	**71.2**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 10:35
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**1,920**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-23R		Lab ID:HS25030029-07
Collection Date:	28-Feb-2025 11:45		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.302**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 22:57
Calcium	**547**		**3.40**	**50.0**	**mg/L**	100	06-Mar-2025 21:09
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**1,040**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 10:41
Sulfate	**1,720**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 10:41
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**3,920**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-28D		Lab ID:HS25030029-08
Collection Date:	28-Feb-2025 11:10		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.175**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:00
Calcium	**124**		**0.0340**	**0.500**	**mg/L**	1	05-Mar-2025 23:00
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**160**		**1.00**	**2.50**	**mg/L**	5	03-Mar-2025 10:47
Sulfate	**118**		**1.00**	**2.50**	**mg/L**	5	03-Mar-2025 10:47
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**656**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III	WorkOrder:	HS25030029
Sample ID:	MW-42	Lab ID:	HS25030029-09
Collection Date:	28-Feb-2025 11:05	Matrix:	Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.520**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:02
Calcium	**151**		**0.0340**	**0.500**	**mg/L**	1	05-Mar-2025 23:02
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**329**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:15
Sulfate	**548**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:15
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**1,410**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-43		Lab ID:HS25030029-10
Collection Date:	28-Feb-2025 12:35		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.365**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:04
Calcium	**86.0**		**0.0340**	**0.500**	**mg/L**	1	05-Mar-2025 23:04
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**239**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:32
Sulfate	**87.0**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:32
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**764**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-44		Lab ID:HS25030029-11
Collection Date:	28-Feb-2025 08:55		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.212**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:07
Calcium	**101**		**0.0340**	**0.500**	**mg/L**	1	05-Mar-2025 23:07
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**224**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:38
Sulfate	**100**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:38
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**760**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-46R		Lab ID:HS25030029-12
Collection Date:	28-Feb-2025 07:55		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.203**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:09
Calcium	**120**		**0.0340**	**0.500**	**mg/L**	1	05-Mar-2025 23:09
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**189**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:44
Sulfate	**119**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:44
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**720**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC	ANALYTICAL REPORT
Project:	NRG - CCR Program-APP III	WorkOrder:HS25030029
Sample ID:	MW-47	Lab ID:HS25030029-13
Collection Date:	28-Feb-2025 11:25	Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.264**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:11
Calcium	**115**		**0.0340**	**0.500**	**mg/L**	1	05-Mar-2025 23:11
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**326**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:50
Sulfate	**95.3**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:50
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**872**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III	WorkOrder:	HS25030029
Sample ID:	MW-48	Lab ID:	HS25030029-14
Collection Date:	28-Feb-2025 10:40	Matrix:	Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.496**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:21
Calcium	**56.4**		**0.0340**	**0.500**	**mg/L**	1	05-Mar-2025 23:21
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**386**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:56
Sulfate	**106**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 12:56
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**1,060**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-50		Lab ID:HS25030029-15
Collection Date:	28-Feb-2025 10:35		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.295**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:23
Calcium	**137**		**0.0340**	**0.500**	**mg/L**	1	05-Mar-2025 23:23
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**413**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 13:25
Sulfate	**163**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 13:25
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**1,190**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-52		Lab ID:HS25030029-16
Collection Date:	28-Feb-2025 09:45		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.351**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:25
Calcium	**221**		**3.40**	**50.0**	**mg/L**	100	06-Mar-2025 21:11
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**529**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 13:31
Sulfate	**476**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 13:31
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**1,680**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-54		Lab ID:HS25030029-17
Collection Date:	28-Feb-2025 08:10		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.297**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:28
Calcium	**118**		**0.0340**	**0.500**	**mg/L**	1	05-Mar-2025 23:28
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**290**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 13:37
Sulfate	**117**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 13:37
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**804**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-55R		Lab ID:HS25030029-18
Collection Date:	28-Feb-2025 09:05		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.473**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:30
Calcium	**111**		**0.0340**	**0.500**	**mg/L**	1	05-Mar-2025 23:30
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**321**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 13:43
Sulfate	**112**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 13:43
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**880**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 10:20
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

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Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-58		Lab ID:HS25030029-19
Collection Date:	28-Feb-2025 09:55		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.382**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:49
Calcium	**97.8**		**0.0340**	**0.500**	**mg/L**	1	05-Mar-2025 23:49
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**285**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 13:49
Sulfate	**142**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 13:49
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**964**		**3.00**	**10.0**	**mg/L**	1	05-Mar-2025 01:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-65		Lab ID:HS25030029-20
Collection Date:	28-Feb-2025 09:50		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.223**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:32
Calcium	**195**		**3.40**	**50.0**	**mg/L**	100	06-Mar-2025 21:13
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**170**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 14:06
Sulfate	**325**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 14:06
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**660**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 11:16
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-36		Lab ID:HS25030029-21
Collection Date:	28-Feb-2025 09:00		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.0734**		**0.0110**	**0.0200**	**mg/L**	1	05-Mar-2025 23:35
Calcium	**225**		**3.40**	**50.0**	**mg/L**	100	06-Mar-2025 21:16
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**320**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 14:12
Sulfate	**463**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 14:12
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**1,280**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 11:16
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III	WorkOrder:	HS25030029
Sample ID:	MW-37	Lab ID:	HS25030029-22
Collection Date:	28-Feb-2025 10:40	Matrix:	Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.508**		**0.0110**	**0.0200**	**mg/L**	1	06-Mar-2025 00:10
Calcium	**315**		**3.40**	**50.0**	**mg/L**	100	06-Mar-2025 20:52
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**239**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 14:18
Sulfate	**1,440**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 14:18
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**2,260**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 11:16
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-38R		Lab ID:HS25030029-23
Collection Date:	28-Feb-2025 09:55		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.372**		**0.0110**	**0.0200**	**mg/L**	1	06-Mar-2025 00:13
Calcium	**244**		**3.40**	**50.0**	**mg/L**	100	06-Mar-2025 20:55
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**281**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 14:47
Sulfate	**777**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 14:47
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**1,570**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 11:16
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-60		Lab ID:HS25030029-24
Collection Date:	28-Feb-2025 08:15		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.0941**		**0.0110**	**0.0200**	**mg/L**	1	06-Mar-2025 00:15
Calcium	**218**		**3.40**	**50.0**	**mg/L**	100	06-Mar-2025 20:57
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**304**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 14:53
Sulfate	**341**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 14:53
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**1,180**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 11:16
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	MW-61R		Lab ID:HS25030029-25
Collection Date:	28-Feb-2025 11:35		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.0885**		**0.0110**	**0.0200**	**mg/L**	1	06-Mar-2025 00:17
Calcium	**225**		**3.40**	**50.0**	**mg/L**	100	06-Mar-2025 21:04
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**303**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 14:59
Sulfate	**771**		**4.00**	**10.0**	**mg/L**	20	03-Mar-2025 14:59
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**2,230**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 11:16
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	FIELD BLANK		Lab ID:HS25030029-26
Collection Date:	28-Feb-2025 11:50		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	< 0.0110		0.0110	0.0200	mg/L	1	06-Mar-2025 00:20
Calcium	< 0.0340		0.0340	0.500	mg/L	1	06-Mar-2025 00:20
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	< 0.200		0.200	0.500	mg/L	1	03-Mar-2025 15:05
Sulfate	< 0.200		0.200	0.500	mg/L	1	03-Mar-2025 15:05
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	< 3.00		3.00	10.0	mg/L	1	06-Mar-2025 11:16
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	FIELD DUPLICATE 1		Lab ID:HS25030029-27
Collection Date:	28-Feb-2025 11:00		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.0699**		**0.0110**	**0.0200**	**mg/L**	1	06-Mar-2025 00:22
Calcium	**222**		**3.40**	**50.0**	**mg/L**	100	06-Mar-2025 21:06
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**316**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 15:11
Sulfate	**458**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 15:11
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**1,080**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 11:16
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG - CCR Program-APP III		WorkOrder:HS25030029
Sample ID:	FIELD DUPLICATE 2		Lab ID:HS25030029-28
Collection Date:	28-Feb-2025 09:00		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 03-Mar-2025		Analyst: ALR
Boron	**0.200**		**0.0110**	**0.0200**	**mg/L**	1	06-Mar-2025 00:24
Calcium	**98.1**		**0.0340**	**0.500**	**mg/L**	1	06-Mar-2025 00:24
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**220**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 15:16
Sulfate	**100**		**2.00**	**5.00**	**mg/L**	10	03-Mar-2025 15:16
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: WM
Total Dissolved Solids (Residue, Filterable)	**656**		**3.00**	**10.0**	**mg/L**	1	06-Mar-2025 11:16
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	10-Mar-2025 14:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Weight / Prep Log

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

Batch ID: 224887 **Start Date:** 03 Mar 2025 13:30 **End Date:** 03 Mar 2025 13:30
Method: WATER - SW3010A **Prep Code:** 3010A

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS25030029-07		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-08		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-09		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-10		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-11		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-12		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-13		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-14		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-15		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-16		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-17		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-18		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-20		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-21		10 (mL)	10 (mL)	1	120 plastic HNO3

Batch ID: 224893 **Start Date:** 03 Mar 2025 09:30 **End Date:** 03 Mar 2025 09:30
Method: WATER - SW3010A **Prep Code:** 3010A

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS25030029-01		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-02		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-03		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-04		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-05		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-06		10 (mL)	10 (mL)	1	120 plastic HNO3

Batch ID: 224902 **Start Date:** 03 Mar 2025 11:00 **End Date:** 03 Mar 2025 11:00
Method: WATER - SW3010A **Prep Code:** 3010A

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS25030029-19		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-22		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-23		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-24		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-25		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-26		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-27		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25030029-28		10 (mL)	10 (mL)	1	120 plastic HNO3

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: 224887 (0)	**Test Name :** ICP-MS METALS BY SW6020A				**Matrix:** Water	
HS25030029-07	MW-23R	28 Feb 2025 11:45		03 Mar 2025 13:30	06 Mar 2025 21:09	100
HS25030029-07	MW-23R	28 Feb 2025 11:45		03 Mar 2025 13:30	05 Mar 2025 22:57	1
HS25030029-08	MW-28D	28 Feb 2025 11:10		03 Mar 2025 13:30	05 Mar 2025 23:00	1
HS25030029-09	MW-42	28 Feb 2025 11:05		03 Mar 2025 13:30	05 Mar 2025 23:02	1
HS25030029-10	MW-43	28 Feb 2025 12:35		03 Mar 2025 13:30	05 Mar 2025 23:04	1
HS25030029-11	MW-44	28 Feb 2025 08:55		03 Mar 2025 13:30	05 Mar 2025 23:07	1
HS25030029-12	MW-46R	28 Feb 2025 07:55		03 Mar 2025 13:30	05 Mar 2025 23:09	1
HS25030029-13	MW-47	28 Feb 2025 11:25		03 Mar 2025 13:30	05 Mar 2025 23:11	1
HS25030029-14	MW-48	28 Feb 2025 10:40		03 Mar 2025 13:30	05 Mar 2025 23:21	1
HS25030029-15	MW-50	28 Feb 2025 10:35		03 Mar 2025 13:30	05 Mar 2025 23:23	1
HS25030029-16	MW-52	28 Feb 2025 09:45		03 Mar 2025 13:30	06 Mar 2025 21:11	100
HS25030029-16	MW-52	28 Feb 2025 09:45		03 Mar 2025 13:30	05 Mar 2025 23:25	1
HS25030029-17	MW-54	28 Feb 2025 08:10		03 Mar 2025 13:30	05 Mar 2025 23:28	1
HS25030029-18	MW-55R	28 Feb 2025 09:05		03 Mar 2025 13:30	05 Mar 2025 23:30	1
HS25030029-20	MW-65	28 Feb 2025 09:50		03 Mar 2025 13:30	06 Mar 2025 21:13	100
HS25030029-20	MW-65	28 Feb 2025 09:50		03 Mar 2025 13:30	05 Mar 2025 23:32	1
HS25030029-21	MW-36	28 Feb 2025 09:00		03 Mar 2025 13:30	06 Mar 2025 21:16	100
HS25030029-21	MW-36	28 Feb 2025 09:00		03 Mar 2025 13:30	05 Mar 2025 23:35	1
Batch ID: 224893 (0)	**Test Name :** ICP-MS METALS BY SW6020A				**Matrix:** Water	
HS25030029-01	MW-39R	28 Feb 2025 08:25		03 Mar 2025 09:30	03 Mar 2025 15:04	1
HS25030029-02	MW-40	28 Feb 2025 11:20		03 Mar 2025 09:30	03 Mar 2025 16:15	100
HS25030029-02	MW-40	28 Feb 2025 11:20		03 Mar 2025 09:30	03 Mar 2025 15:07	1
HS25030029-03	MW-41	28 Feb 2025 10:10		03 Mar 2025 09:30	03 Mar 2025 15:09	1
HS25030029-04	MW-62	28 Feb 2025 09:00		03 Mar 2025 09:30	03 Mar 2025 15:11	1
HS25030029-05	MW-63	28 Feb 2025 09:35		03 Mar 2025 09:30	03 Mar 2025 15:18	10
HS25030029-05	MW-63	28 Feb 2025 09:35		03 Mar 2025 09:30	03 Mar 2025 14:36	1
HS25030029-06	MW-64	28 Feb 2025 10:45		03 Mar 2025 09:30	03 Mar 2025 16:17	100
HS25030029-06	MW-64	28 Feb 2025 10:45		03 Mar 2025 09:30	03 Mar 2025 15:14	1

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: 224902 (0)	**Test Name :** ICP-MS METALS BY SW6020A				**Matrix:** Water	
HS25030029-19	MW-58	28 Feb 2025 09:55		03 Mar 2025 11:00	05 Mar 2025 23:49	1
HS25030029-22	MW-37	28 Feb 2025 10:40		03 Mar 2025 11:00	06 Mar 2025 20:52	100
HS25030029-22	MW-37	28 Feb 2025 10:40		03 Mar 2025 11:00	06 Mar 2025 00:10	1
HS25030029-23	MW-38R	28 Feb 2025 09:55		03 Mar 2025 11:00	06 Mar 2025 20:55	100
HS25030029-23	MW-38R	28 Feb 2025 09:55		03 Mar 2025 11:00	06 Mar 2025 00:13	1
HS25030029-24	MW-60	28 Feb 2025 08:15		03 Mar 2025 11:00	06 Mar 2025 20:57	100
HS25030029-24	MW-60	28 Feb 2025 08:15		03 Mar 2025 11:00	06 Mar 2025 00:15	1
HS25030029-25	MW-61R	28 Feb 2025 11:35		03 Mar 2025 11:00	06 Mar 2025 21:04	100
HS25030029-25	MW-61R	28 Feb 2025 11:35		03 Mar 2025 11:00	06 Mar 2025 00:17	1
HS25030029-26	FIELD BLANK	28 Feb 2025 11:50		03 Mar 2025 11:00	06 Mar 2025 00:20	1
HS25030029-27	FIELD DUPLICATE 1	28 Feb 2025 11:00		03 Mar 2025 11:00	06 Mar 2025 21:06	100
HS25030029-27	FIELD DUPLICATE 1	28 Feb 2025 11:00		03 Mar 2025 11:00	06 Mar 2025 00:22	1
HS25030029-28	FIELD DUPLICATE 2	28 Feb 2025 09:00		03 Mar 2025 11:00	06 Mar 2025 00:24	1
Batch ID: R507896 (0)	**Test Name :** ANIONS BY E300.0, REV 2.1, 1993				**Matrix:** Water	
HS25030029-01	MW-39R	28 Feb 2025 08:25			03 Mar 2025 09:42	10
HS25030029-02	MW-40	28 Feb 2025 11:20			03 Mar 2025 09:48	20
HS25030029-03	MW-41	28 Feb 2025 10:10			03 Mar 2025 09:54	10
HS25030029-04	MW-62	28 Feb 2025 09:00			03 Mar 2025 10:00	20
HS25030029-05	MW-63	28 Feb 2025 09:35			03 Mar 2025 10:53	10
HS25030029-05	MW-63	28 Feb 2025 09:35			03 Mar 2025 10:29	1
HS25030029-06	MW-64	28 Feb 2025 10:45			03 Mar 2025 10:35	20
HS25030029-07	MW-23R	28 Feb 2025 11:45			03 Mar 2025 10:41	20
HS25030029-08	MW-28D	28 Feb 2025 11:10			03 Mar 2025 10:47	5

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: R507897 (0)	**Test Name :** ANIONS BY E300.0, REV 2.1, 1993				**Matrix:** Water	
HS25030029-09	MW-42	28 Feb 2025 11:05			03 Mar 2025 12:15	10
HS25030029-10	MW-43	28 Feb 2025 12:35			03 Mar 2025 12:32	10
HS25030029-11	MW-44	28 Feb 2025 08:55			03 Mar 2025 12:38	10
HS25030029-12	MW-46R	28 Feb 2025 07:55			03 Mar 2025 12:44	10
HS25030029-13	MW-47	28 Feb 2025 11:25			03 Mar 2025 12:50	10
HS25030029-14	MW-48	28 Feb 2025 10:40			03 Mar 2025 12:56	10
HS25030029-15	MW-50	28 Feb 2025 10:35			03 Mar 2025 13:25	10
HS25030029-16	MW-52	28 Feb 2025 09:45			03 Mar 2025 13:31	10
HS25030029-17	MW-54	28 Feb 2025 08:10			03 Mar 2025 13:37	10
HS25030029-18	MW-55R	28 Feb 2025 09:05			03 Mar 2025 13:43	10
HS25030029-19	MW-58	28 Feb 2025 09:55			03 Mar 2025 13:49	10
HS25030029-20	MW-65	28 Feb 2025 09:50			03 Mar 2025 14:06	10
HS25030029-21	MW-36	28 Feb 2025 09:00			03 Mar 2025 14:12	10
HS25030029-22	MW-37	28 Feb 2025 10:40			03 Mar 2025 14:18	20
HS25030029-23	MW-38R	28 Feb 2025 09:55			03 Mar 2025 14:47	20
HS25030029-24	MW-60	28 Feb 2025 08:15			03 Mar 2025 14:53	10
HS25030029-25	MW-61R	28 Feb 2025 11:35			03 Mar 2025 14:59	20
HS25030029-26	FIELD BLANK	28 Feb 2025 11:50			03 Mar 2025 15:05	1
HS25030029-27	FIELD DUPLICATE 1	28 Feb 2025 11:00			03 Mar 2025 15:11	10
HS25030029-28	FIELD DUPLICATE 2	28 Feb 2025 09:00			03 Mar 2025 15:16	10

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: R508121 (0)	**Test Name :** TOTAL DISSOLVED SOLIDS BY SM2540C				**Matrix:** Water	
HS25030029-01	MW-39R	28 Feb 2025 08:25			06 Mar 2025 10:20	1
HS25030029-02	MW-40	28 Feb 2025 11:20			06 Mar 2025 10:20	1
HS25030029-03	MW-41	28 Feb 2025 10:10			06 Mar 2025 10:20	1
HS25030029-04	MW-62	28 Feb 2025 09:00			06 Mar 2025 10:20	1
HS25030029-05	MW-63	28 Feb 2025 09:35			06 Mar 2025 10:20	1
HS25030029-06	MW-64	28 Feb 2025 10:45			06 Mar 2025 10:20	1
HS25030029-07	MW-23R	28 Feb 2025 11:45			06 Mar 2025 10:20	1
HS25030029-08	MW-28D	28 Feb 2025 11:10			06 Mar 2025 10:20	1
HS25030029-09	MW-42	28 Feb 2025 11:05			06 Mar 2025 10:20	1
HS25030029-10	MW-43	28 Feb 2025 12:35			06 Mar 2025 10:20	1
HS25030029-11	MW-44	28 Feb 2025 08:55			06 Mar 2025 10:20	1
HS25030029-12	MW-46R	28 Feb 2025 07:55			06 Mar 2025 10:20	1
HS25030029-13	MW-47	28 Feb 2025 11:25			06 Mar 2025 10:20	1
HS25030029-14	MW-48	28 Feb 2025 10:40			06 Mar 2025 10:20	1
HS25030029-15	MW-50	28 Feb 2025 10:35			06 Mar 2025 10:20	1
HS25030029-16	MW-52	28 Feb 2025 09:45			06 Mar 2025 10:20	1
HS25030029-17	MW-54	28 Feb 2025 08:10			06 Mar 2025 10:20	1
HS25030029-18	MW-55R	28 Feb 2025 09:05			06 Mar 2025 10:20	1
Batch ID: R508222 (0)	**Test Name :** TOTAL DISSOLVED SOLIDS BY SM2540C				**Matrix:** Water	
HS25030029-19	MW-58	28 Feb 2025 09:55			05 Mar 2025 01:30	1
Batch ID: R508232 (0)	**Test Name :** TOTAL DISSOLVED SOLIDS BY SM2540C				**Matrix:** Water	
HS25030029-20	MW-65	28 Feb 2025 09:50			06 Mar 2025 11:16	1
HS25030029-21	MW-36	28 Feb 2025 09:00			06 Mar 2025 11:16	1
HS25030029-22	MW-37	28 Feb 2025 10:40			06 Mar 2025 11:16	1
HS25030029-23	MW-38R	28 Feb 2025 09:55			06 Mar 2025 11:16	1
HS25030029-24	MW-60	28 Feb 2025 08:15			06 Mar 2025 11:16	1
HS25030029-25	MW-61R	28 Feb 2025 11:35			06 Mar 2025 11:16	1
HS25030029-26	FIELD BLANK	28 Feb 2025 11:50			06 Mar 2025 11:16	1
HS25030029-27	FIELD DUPLICATE 1	28 Feb 2025 11:00			06 Mar 2025 11:16	1
HS25030029-28	FIELD DUPLICATE 2	28 Feb 2025 09:00			06 Mar 2025 11:16	1

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: R508380 (0)	**Test Name :** SUBCONTRACT ANALYSIS - FLOURIDE				**Matrix:** Water	
HS25030029-01	MW-39R	28 Feb 2025 08:25			10 Mar 2025 14:30	1
HS25030029-02	MW-40	28 Feb 2025 11:20			10 Mar 2025 14:30	1
HS25030029-03	MW-41	28 Feb 2025 10:10			10 Mar 2025 14:30	1
HS25030029-04	MW-62	28 Feb 2025 09:00			10 Mar 2025 14:30	1
HS25030029-05	MW-63	28 Feb 2025 09:35			10 Mar 2025 14:30	1
HS25030029-06	MW-64	28 Feb 2025 10:45			10 Mar 2025 14:30	1
HS25030029-07	MW-23R	28 Feb 2025 11:45			10 Mar 2025 14:30	1
HS25030029-08	MW-28D	28 Feb 2025 11:10			10 Mar 2025 14:30	1
HS25030029-09	MW-42	28 Feb 2025 11:05			10 Mar 2025 14:30	1
HS25030029-10	MW-43	28 Feb 2025 12:35			10 Mar 2025 14:30	1
HS25030029-11	MW-44	28 Feb 2025 08:55			10 Mar 2025 14:30	1
HS25030029-12	MW-46R	28 Feb 2025 07:55			10 Mar 2025 14:30	1
HS25030029-13	MW-47	28 Feb 2025 11:25			10 Mar 2025 14:30	1
HS25030029-14	MW-48	28 Feb 2025 10:40			10 Mar 2025 14:30	1
HS25030029-15	MW-50	28 Feb 2025 10:35			10 Mar 2025 14:30	1
HS25030029-16	MW-52	28 Feb 2025 09:45			10 Mar 2025 14:30	1
HS25030029-17	MW-54	28 Feb 2025 08:10			10 Mar 2025 14:30	1
HS25030029-18	MW-55R	28 Feb 2025 09:05			10 Mar 2025 14:30	1
HS25030029-19	MW-58	28 Feb 2025 09:55			10 Mar 2025 14:30	1
HS25030029-20	MW-65	28 Feb 2025 09:50			10 Mar 2025 14:30	1
HS25030029-21	MW-36	28 Feb 2025 09:00			10 Mar 2025 14:30	1
HS25030029-22	MW-37	28 Feb 2025 10:40			10 Mar 2025 14:30	1
HS25030029-23	MW-38R	28 Feb 2025 09:55			10 Mar 2025 14:30	1
HS25030029-24	MW-60	28 Feb 2025 08:15			10 Mar 2025 14:30	1
HS25030029-25	MW-61R	28 Feb 2025 11:35			10 Mar 2025 14:30	1
HS25030029-26	FIELD BLANK	28 Feb 2025 11:50			10 Mar 2025 14:30	1
HS25030029-27	FIELD DUPLICATE 1	28 Feb 2025 11:00			10 Mar 2025 14:30	1
HS25030029-28	FIELD DUPLICATE 2	28 Feb 2025 09:00			10 Mar 2025 14:30	1

WorkOrder: HS25030029
InstrumentID: ICPMS07
Test Code: ICP_TW
Test Number: SW6020A
Test Name: ICP-MS Metals by SW6020A

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Boron	7440-42-8	0.0125	0.00744	0.0110	0.0200
A	Calcium	7440-70-2	0.100	0.130	0.0340	0.500

WorkOrder:	HS25030029
InstrumentID:	Subcontract
Test Code:	Sub_Flouride
Test Number:	NA
Test Name:	Subcontract Analysis - Flouride

METHOD DETECTION / REPORTING LIMITS

Matrix: **Units:**

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Subcontract Analysis		0	0	0	0

WorkOrder: HS25030029
InstrumentID: ICS-Integrion
Test Code: 300_W
Test Number: E300
Test Name: Anions by E300.0, Rev 2.1, 1993

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Chloride	16887-00-6	0.250	0.284	0.200	0.500
A	Sulfate	14808-79-8	0.250	0.324	0.200	0.500

WorkOrder: HS25030029
InstrumentID: Balance1
Test Code: TDS_W 2540C
Test Number: M2540C
Test Name: Total Dissolved Solids by SM2540C

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Total Dissolved Solids (Residue, Filterable)	TDS	5.00	1.60	3.00	10.0

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: 224887 (0) **Instrument:** ICPMS07 **Method:** ICP-MS METALS BY SW6020A

MBLK Sample ID: **MBLK-224887** Units: **mg/L** Analysis Date: **05-Mar-2025 22:15**
Client ID: Run ID: **ICPMS07_508085** SeqNo: **8709127** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	< 0.0110	0.0200								
Calcium	< 0.0340	0.500								

LCS Sample ID: **LCS-224887** Units: **mg/L** Analysis Date: **05-Mar-2025 22:17**
Client ID: Run ID: **ICPMS07_508085** SeqNo: **8709128** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.4516	0.0200	0.5	0	90.3	80 - 120				
Calcium	4.866	0.500	5	0	97.3	80 - 120				

MS Sample ID: **HS25030018-01MS** Units: **mg/L** Analysis Date: **05-Mar-2025 22:27**
Client ID: Run ID: **ICPMS07_508085** SeqNo: **8709132** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.5814	0.0200	0.5	0.07929	100	80 - 120				
Calcium	116.7	0.500	5	111.7	99.9	80 - 120				O

MSD Sample ID: **HS25030018-01MSD** Units: **mg/L** Analysis Date: **05-Mar-2025 22:29**
Client ID: Run ID: **ICPMS07_508085** SeqNo: **8709133** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.5282	0.0200	0.5	0.07929	89.8	80 - 120	0.5814	9.6	20	
Calcium	111.9	0.500	5	111.7	3.19	80 - 120	116.7	4.23	20	SO

PDS Sample ID: **HS25030018-01PDS** Units: **mg/L** Analysis Date: **05-Mar-2025 22:31**
Client ID: Run ID: **ICPMS07_508085** SeqNo: **8709134** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.5136	0.0200	0.5	0.07929	86.9	75 - 125				
Calcium	121.7	0.500	10	111.7	99.2	75 - 125				O

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: 224887 (0) **Instrument:** ICPMS07 **Method:** ICP-MS METALS BY SW6020A

SD Sample ID: **HS25030018-01SD** Units: **mg/L** Analysis Date: **05-Mar-2025 22:20**
Client ID: Run ID: **ICPMS07_508085** SeqNo: **8709129** PrepDate: **03-Mar-2025** DF: **5**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Boron	0.1002	0.100					0.07929	0	10	
Calcium	114.4	2.50					111.7	2.36	10	

The following samples were analyzed in this batch:

HS25030029-07	HS25030029-08	HS25030029-09	HS25030029-10
HS25030029-11	HS25030029-12	HS25030029-13	HS25030029-14
HS25030029-15	HS25030029-16	HS25030029-17	HS25030029-18
HS25030029-20	HS25030029-21		

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: 224893 (0) **Instrument:** ICPMS07 **Method:** ICP-MS METALS BY SW6020A

MBLK Sample ID: **MBLK-224893** Units: **mg/L** Analysis Date: **03-Mar-2025 14:06**
Client ID: Run ID: **ICPMS07_507848** SeqNo: **8705146** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	< 0.0110	0.0200								
Calcium	< 0.0340	0.500								

LCS Sample ID: **LCS-224893** Units: **mg/L** Analysis Date: **03-Mar-2025 14:34**
Client ID: Run ID: **ICPMS07_507848** SeqNo: **8705188** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.4947	0.0200	0.5	0	98.9	80 - 120				
Calcium	5.107	0.500	5	0	102	80 - 120				

MS Sample ID: **HS25030029-05MS** Units: **mg/L** Analysis Date: **03-Mar-2025 14:41**
Client ID: **MW-63** Run ID: **ICPMS07_507848** SeqNo: **8705191** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	1.16	0.0200	0.5	0.7556	80.8	80 - 120				E
Calcium	110.1	0.500	5	103.1	139	80 - 120				SO

MSD Sample ID: **HS25030029-05MSD** Units: **mg/L** Analysis Date: **03-Mar-2025 14:43**
Client ID: **MW-63** Run ID: **ICPMS07_507848** SeqNo: **8705192** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	1.163	0.0200	0.5	0.7556	81.6	80 - 120	1.16	0.319	20	E
Calcium	107	0.500	5	103.1	78.2	80 - 120	110.1	2.82	20	SO

PDS Sample ID: **HS25030029-05PDS** Units: **mg/L** Analysis Date: **03-Mar-2025 15:21**
Client ID: **MW-63** Run ID: **ICPMS07_507848** SeqNo: **8705306** PrepDate: **03-Mar-2025** DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	5.116	0.200	5	0.7427	87.5	75 - 125				

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: 224893 (0) **Instrument:** ICPMS07 **Method:** ICP-MS METALS BY SW6020A

PDS Sample ID: **HS25030029-05PDS** Units: **mg/L** Analysis Date: **03-Mar-2025 14:46**
Client ID: **MW-63** Run ID: **ICPMS07_507848** SeqNo: **8705193** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Calcium	114	0.500	10	103.1	109	75 - 125				O

SD Sample ID: **HS25030029-05SD** Units: **mg/L** Analysis Date: **03-Mar-2025 15:23**
Client ID: **MW-63** Run ID: **ICPMS07_507848** SeqNo: **8705307** PrepDate: **03-Mar-2025** DF: **50**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Boron	1.039	1.00					0.7427	0	10	

SD Sample ID: **HS25030029-05SD** Units: **mg/L** Analysis Date: **03-Mar-2025 14:39**
Client ID: **MW-63** Run ID: **ICPMS07_507848** SeqNo: **8705190** PrepDate: **03-Mar-2025** DF: **5**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Calcium	110.7	2.50					103.1	7.38	10	

The following samples were analyzed in this batch:

HS25030029-01	HS25030029-02	HS25030029-03	HS25030029-04
HS25030029-05	HS25030029-06		

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: 224902 (0) **Instrument:** ICPMS07 **Method:** ICP-MS METALS BY SW6020A

MBLK Sample ID: **MBLK-224902** Units: **mg/L** Analysis Date: **06-Mar-2025 13:15**
Client ID: Run ID: **ICPMS07_508152** SeqNo: **8710594** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	< 0.0110	0.0200								
Calcium	< 0.0340	0.500								

LCS Sample ID: **LCS-224902** Units: **mg/L** Analysis Date: **05-Mar-2025 23:47**
Client ID: Run ID: **ICPMS07_508085** SeqNo: **8709209** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.5266	0.0200	0.5	0	105	80 - 120				
Calcium	4.895	0.500	5	0	97.9	80 - 120				

MS Sample ID: **HS25030030-02MS** Units: **mg/L** Analysis Date: **06-Mar-2025 00:39**
Client ID: Run ID: **ICPMS07_508085** SeqNo: **8709257** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	3.09	0.0200	0.5	2.534	111	80 - 120				EO
Calcium	610.5	0.500	5	588.9	432	80 - 120				SEO

MS Sample ID: **HS25030029-19MS** Units: **mg/L** Analysis Date: **05-Mar-2025 23:54**
Client ID: **MW-58** Run ID: **ICPMS07_508085** SeqNo: **8709212** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.8909	0.0200	0.5	0.3823	102	80 - 120				
Calcium	108	0.500	5	97.76	205	80 - 120				SO

MSD Sample ID: **HS25030030-02MSD** Units: **mg/L** Analysis Date: **06-Mar-2025 00:43**
Client ID: Run ID: **ICPMS07_508085** SeqNo: **8709259** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	3.119	0.0200	0.5	2.534	117	80 - 120	3.09	0.941	20	EO
Calcium	608.3	0.500	5	588.9	388	80 - 120	610.5	0.367	20	SEO

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: 224902 (0) **Instrument:** ICPMS07 **Method:** ICP-MS METALS BY SW6020A

MSD Sample ID: **HS25030029-19MSD** Units: **mg/L** Analysis Date: **05-Mar-2025 23:56**
Client ID: **MW-58** Run ID: **ICPMS07_508085** SeqNo: **8709213** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.8892	0.0200	0.5	0.3823	101	80 - 120	0.8909	0.187	20	
Calcium	107.7	0.500	5	97.76	198	80 - 120	108	0.309	20	SO

PDS Sample ID: **HS25030030-02PDS** Units: **mg/L** Analysis Date: **07-Mar-2025 12:21**
Client ID: Run ID: **ICPMS06_508235** SeqNo: **8712787** PrepDate: **03-Mar-2025** DF: **50**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	49.35	1.00	50	2.693	93.3	75 - 125				

PDS Sample ID: **HS25030029-19PDS** Units: **mg/L** Analysis Date: **05-Mar-2025 23:58**
Client ID: **MW-58** Run ID: **ICPMS07_508085** SeqNo: **8709214** PrepDate: **03-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.8007	0.0200	0.5	0.3823	83.7	75 - 125				
Calcium	108.3	0.500	10	97.76	105	75 - 125				O

PDS Sample ID: **HS25030030-02PDS** Units: **mg/L** Analysis Date: **06-Mar-2025 20:29**
Client ID: Run ID: **ICPMS07_508152** SeqNo: **8711383** PrepDate: **03-Mar-2025** DF: **50**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Calcium	1110	25.0	500	586.3	105	75 - 125				

SD Sample ID: **HS25030030-02SD** Units: **mg/L** Analysis Date: **06-Mar-2025 20:27**
Client ID: Run ID: **ICPMS07_508152** SeqNo: **8711382** PrepDate: **03-Mar-2025** DF: **250**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Boron	3.356	5.00					2.693	0	10	J
Calcium	630.3	125					586.3	7.51	10	

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: **224902 (0)** **Instrument:** **ICPMS07** **Method:** **ICP-MS METALS BY SW6020A**

SD Sample ID: **HS25030029-19SD** Units: **mg/L** Analysis Date: **05-Mar-2025 23:51**

Client ID: **MW-58** Run ID: **ICPMS07_508085** SeqNo: **8709211** PrepDate: **03-Mar-2025** DF: **5**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Boron	0.3996	0.100					0.3823	4.52	10	
Calcium	98.5	2.50					97.76	0.761	10	

The following samples were analyzed in this batch:

HS25030029-19	HS25030029-22	HS25030029-23	HS25030029-24
HS25030029-25	HS25030029-26	HS25030029-27	HS25030029-28

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: R507896 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY E300.0, REV 2.1, 1993

MBLK Sample ID: **MBLK** Units: **mg/L** Analysis Date: **03-Mar-2025 07:29**
Client ID: Run ID: **ICS-Integrion_507896** SeqNo: **8705921** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	< 0.200	0.500								
Sulfate	< 0.200	0.500								

LCS Sample ID: **LCS** Units: **mg/L** Analysis Date: **03-Mar-2025 07:35**
Client ID: Run ID: **ICS-Integrion_507896** SeqNo: **8705922** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	20.16	0.500	20	0	101	90 - 110				
Sulfate	20.79	0.500	20	0	104	90 - 110				

MS Sample ID: **HS25030029-05MS** Units: **mg/L** Analysis Date: **03-Mar-2025 10:59**
Client ID: **MW-63** Run ID: **ICS-Integrion_507896** SeqNo: **8705949** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	125	5.00	100	29.04	96.0	80 - 120				
Sulfate	398	5.00	100	315	83.0	80 - 120				

MS Sample ID: **HS25030029-01MS** Units: **mg/L** Analysis Date: **03-Mar-2025 11:16**
Client ID: **MW-39R** Run ID: **ICS-Integrion_507896** SeqNo: **8705951** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	405.8	5.00	100	321.2	84.6	80 - 120				
Sulfate	304.7	5.00	100	212.5	92.3	80 - 120				

MSD Sample ID: **HS25030029-05MSD** Units: **mg/L** Analysis Date: **03-Mar-2025 11:04**
Client ID: **MW-63** Run ID: **ICS-Integrion_507896** SeqNo: **8705950** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	124.3	5.00	100	29.04	95.3	80 - 120	125	0.578	20	
Sulfate	397.6	5.00	100	315	82.6	80 - 120	398	0.102	20	

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: R507896 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY E300.0, REV 2.1, 1993

MSD Sample ID: **HS25030029-01MSD** Units: **mg/L** Analysis Date: **03-Mar-2025 11:22**

Client ID: **MW-39R** Run ID: **ICS-Integrion_507896** SeqNo: **8705952** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	407	5.00	100	321.2	85.8	80 - 120	405.8	0.283	20	
Sulfate	304.6	5.00	100	212.5	92.2	80 - 120	304.7	0.0325	20	

The following samples were analyzed in this batch:

HS25030029-01	HS25030029-02	HS25030029-03	HS25030029-04
HS25030029-05	HS25030029-06	HS25030029-07	HS25030029-08

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: R507897 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY E300.0, REV 2.1, 1993

MBLK Sample ID: **MBLK** Units: **mg/L** Analysis Date: **03-Mar-2025 11:51**
Client ID: Run ID: **ICS-Integrion_507897** SeqNo: **8705961** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	< 0.200	0.500								
Sulfate	< 0.200	0.500								

LCS Sample ID: **LCS** Units: **mg/L** Analysis Date: **03-Mar-2025 12:03**
Client ID: Run ID: **ICS-Integrion_507897** SeqNo: **8705962** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	20.18	0.500	20	0	101	90 - 110				
Sulfate	21.25	0.500	20	0	106	90 - 110				

MS Sample ID: **HS25030029-19MS** Units: **mg/L** Analysis Date: **03-Mar-2025 13:54**
Client ID: **MW-58** Run ID: **ICS-Integrion_507897** SeqNo: **8705978** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	380.8	5.00	100	285.4	95.4	80 - 120				
Sulfate	244.2	5.00	100	141.8	102	80 - 120				

MS Sample ID: **HS25030029-09MS** Units: **mg/L** Analysis Date: **03-Mar-2025 12:21**
Client ID: **MW-42** Run ID: **ICS-Integrion_507897** SeqNo: **8705964** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	416.2	5.00	100	328.6	87.6	80 - 120				
Sulfate	619.4	5.00	100	547.8	71.6	80 - 120				SO

MSD Sample ID: **HS25030029-19MSD** Units: **mg/L** Analysis Date: **03-Mar-2025 14:00**
Client ID: **MW-58** Run ID: **ICS-Integrion_507897** SeqNo: **8705979** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	384.6	5.00	100	285.4	99.2	80 - 120	380.8	0.993	20	
Sulfate	244.7	5.00	100	141.8	103	80 - 120	244.2	0.204	20	

Client:	TRC	**QC BATCH REPORT**
Project:	NRG - CCR Program-APP III	
WorkOrder:	HS25030029	

Batch ID: R507897 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY E300.0, REV 2.1, 1993

MSD Sample ID: **HS25030029-09MSD** Units: **mg/L** Analysis Date: **03-Mar-2025 12:27**

Client ID: **MW-42** Run ID: **ICS-Integrion_507897** SeqNo: **8705965** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	415.3	5.00	100	328.6	86.8	80 - 120	416.2	0.207	20	
Sulfate	617.8	5.00	100	547.8	70.0	80 - 120	619.4	0.247	20	SO

The following samples were analyzed in this batch:

HS25030029-09	HS25030029-10	HS25030029-11	HS25030029-12
HS25030029-13	HS25030029-14	HS25030029-15	HS25030029-16
HS25030029-17	HS25030029-18	HS25030029-19	HS25030029-20
HS25030029-21	HS25030029-22	HS25030029-23	HS25030029-24
HS25030029-25	HS25030029-26	HS25030029-27	HS25030029-28

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: R508121 (0) **Instrument:** Balance1 **Method:** TOTAL DISSOLVED SOLIDS BY SM2540C

MBLK Sample ID: **WMBLK-03042025** Units: **mg/L** Analysis Date: **06-Mar-2025 10:20**
Client ID: Run ID: **Balance1_508121** SeqNo: **8709854** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	< 3.00	10.0								

LCS Sample ID: **WLCS-03042025** Units: **mg/L** Analysis Date: **06-Mar-2025 10:20**
Client ID: Run ID: **Balance1_508121** SeqNo: **8709853** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1066	10.0	1000	0	107	85 - 115				

DUP Sample ID: **HS25030029-05DUP** Units: **mg/L** Analysis Date: **06-Mar-2025 10:20**
Client ID: **MW-63** Run ID: **Balance1_508121** SeqNo: **8709839** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	604	10.0					634	4.85	20	

DUP Sample ID: **HS25021461-01DUP** Units: **mg/L** Analysis Date: **06-Mar-2025 10:20**
Client ID: Run ID: **Balance1_508121** SeqNo: **8709832** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	314	10.0					356	12.5	20	

The following samples were analyzed in this batch:

HS25030029-01	HS25030029-02	HS25030029-03	HS25030029-04
HS25030029-05	HS25030029-06	HS25030029-07	HS25030029-08
HS25030029-09	HS25030029-10	HS25030029-11	HS25030029-12
HS25030029-13	HS25030029-14	HS25030029-15	HS25030029-16
HS25030029-17	HS25030029-18		

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: R508222 (0) **Instrument:** Balance1 **Method:** TOTAL DISSOLVED SOLIDS BY SM2540C

MBLK Sample ID: **WMBLK-03052025** Units: **mg/L** Analysis Date: **05-Mar-2025 01:30**
Client ID: Run ID: **Balance1_508222** SeqNo: **8712120** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	< 3.00	10.0								

LCS Sample ID: **WLCS-03052025** Units: **mg/L** Analysis Date: **05-Mar-2025 01:30**
Client ID: Run ID: **Balance1_508222** SeqNo: **8712119** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1142	10.0	1000	0	114	85 - 115				

DUP Sample ID: **HS25030029-19DUP** Units: **mg/L** Analysis Date: **05-Mar-2025 01:30**
Client ID: **MW-58** Run ID: **Balance1_508222** SeqNo: **8712118** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	920	10.0					964	4.67	20	

DUP Sample ID: **HS25021410-16DUP** Units: **mg/L** Analysis Date: **05-Mar-2025 01:30**
Client ID: Run ID: **Balance1_508222** SeqNo: **8712116** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1300	10.0					1260	3.12	20	

The following samples were analyzed in this batch: HS25030029-19

Client: TRC
Project: NRG - CCR Program-APP III
WorkOrder: HS25030029

QC BATCH REPORT

Batch ID: R508232 (0) **Instrument:** Balance1 **Method:** TOTAL DISSOLVED SOLIDS BY SM2540C

MBLK Sample ID: **WMBLK-03062025** Units: **mg/L** Analysis Date: **06-Mar-2025 11:16**
Client ID: Run ID: **Balance1_508232** SeqNo: **8712258** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	< 3.00	10.0								

LCS Sample ID: **WLCS-03062025** Units: **mg/L** Analysis Date: **06-Mar-2025 11:16**
Client ID: Run ID: **Balance1_508232** SeqNo: **8712257** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1146	10.0	1000	0	115	85 - 115				

DUP Sample ID: **HS25030030-07DUP** Units: **mg/L** Analysis Date: **06-Mar-2025 11:16**
Client ID: Run ID: **Balance1_508232** SeqNo: **8712252** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	980	10.0					1020	4	20	

DUP Sample ID: **HS25030030-02DUP** Units: **mg/L** Analysis Date: **06-Mar-2025 11:16**
Client ID: Run ID: **Balance1_508232** SeqNo: **8712246** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	6080	10.0					6160	1.31	20	

The following samples were analyzed in this batch:

HS25030029-20	HS25030029-21	HS25030029-22	HS25030029-23
HS25030029-24	HS25030029-25	HS25030029-26	HS25030029-27
HS25030029-28			

Client:	TRC	**QUALIFIERS, ACRONYMS, UNITS**
Project:	NRG - CCR Program-APP III	
WorkOrder:	**HS25030029**	

Qualifier	Description
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte detected below quantitation limit
M	Manually integrated, see raw data for justification
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL/SDL

Acronym	Description
DCS	Detectability Check Study
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitaion Limit
SD	Serial Dilution
SDL	Sample Detection Limit
TRRP	Texas Risk Reduction Program

CERTIFICATIONS,ACCREDITATIONS & LICENSES

Agency	Number	Expire Date
Arizona	AZ0793	27-May-2025
Arkansas	88-00356_2024	27-Mar-2025
California	2919; 2025	30-Apr-2025
Dept of Defense	L24-240	30-Apr-2026
Dept of Defense	L24-239	30-Apr-2026
Florida	E87611-38	30-Jun-2025
Illinois	2000322023-11	31-Jul-2025
Kansas	E-10352 2023-2024	31-Jul-2025
Kentucky	123043	30-Apr-2025
Louisiana	03087 2023-2024	30-Jun-2025
Maine	2024017	23-Jun-2026
Michigan	9971	30-Apr-2025
Nebraska	NE-OS-25-13	30-Apr-2025
New Jersey	TX008	30-Jun-2025
Pennsylvania	018	30-Jun-2025
Tennessee	04016	30-Apr-2025
Texas	T104704231 TX-C24-00130	30-Apr-2025
Utah	TX026932023-14	31-Jul-2025

Sample Receipt Checklist

Work Order ID:	HS25030029	**Date/Time Received:**	**28-Feb-2025 14:00**
Client Name:	TRC-HOU	**Received by:**	**Kaycee Rogers**

Completed By:	*/S/ Ruben Estrada-Jr*	02-Mar-2025 15:06	**Reviewed by:** */S/ Alexis Dorenbosch*	03-Mar-2025 16:30
	eSignature	Date/Time	eSignature	Date/Time

Matrices: **WATER** Carrier name: **Client**

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on shipping container/cooler?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
VOA/TX1005/TX1006 Solids in hermetically sealed vials?	Yes ☐	No ☐	Not Present ☑
Chain of custody present?	Yes ☑	No ☐	4 Page(s)
Chain of custody signed when relinquished and received?	Yes ☑	No ☐	
Samplers name present on COC?	Yes ☑	No ☐	
Chain of custody agrees with sample labels?	Yes ☑	No ☐	
Samples in proper container/bottle?	Yes ☑	No ☐	
Sample containers intact?	Yes ☑	No ☐	
Sufficient sample volume for indicated test?	Yes ☑	No ☐	
All samples received within holding time?	Yes ☑	No ☐	
Container/Temp Blank temperature in compliance?	Yes ☑	No ☐	
Temperature(s)/Thermometer(s):	1.8UC/1.8C-2.0UC-2.0C		IR34
Cooler(s)/Kit(s):	52709/51709		
Date/Time sample(s) sent to storage:	3/2/25 16:00		
Water - VOA vials have zero headspace?	Yes ☐	No ☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	Yes ☑	No ☐	N/A ☐
pH adjusted?	Yes ☐	No ☐	N/A ☑
pH adjusted by:			

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

Corrective Action:

☑ ALS Laboratory Group
10450 Stancliff Rd. #210
Houston, Texas 77099
(Tel) 281.530.5656
(Fax) 281.530.5887

Chain of Custody Form

Page 1 of 4

HS25030029
TRC
NRG - CCR Program-APP III

ALS Project Manager:

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order		Project Name	WA Parish CCR Program	A	ICP_TW (B and Ca) - Appendix III
Work Order		Project Number	528472.0000.0000	B	300_W (Cl, SO4) - Appendix III
Company Name	TRC Corporation	Bill To Company	TRC	C	Sub_Fluoride (Sub to ALS Michigan) - Appendix III
Send Report To	Lori Burris	Invoice Attn.	A/P	D	TDS_W 2540C (TDS) - Appendix III
Address	11767 Katy Freeway	Address	11767 Katy Freeway	E	
	Suite 230		Suite 230	F	
City/State/Zip	Houston, TX 77079	City/State/Zip	Houston, TX 77079	G	
Phone	713-244-1000	Phone	713-244-1000	H	
Fax	713-244-1099	Fax	713-244-1099	I	
e-Mail Address	Lburris@trcsolutions.com	e-Mail Address	apinvoiceapproval@trcsolutions.com	J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	MW-39R	2-28-25	825	Water	2,8	3	X	X	X	X							
2	MW-40		1120	Water	2,8	3	X	X	X	X							
3	MW-41		1010	Water	2,8	3	X	X	X	X							
4	MW-62		900	Water	2,8	3	X	X	X	X							
5	MW-63		935	Water	2,8	3	X	X	X	X							
6	MW-64		1045	Water	2,8	3	X	X	X	X							
7	MW-23R		1115	Water	2,8	3	X	X	X	X							
8	MW-28D		1110	Water	2,8	3	X	X	X	X							
9	MW-42		1105	Water	2,8	3	X	X	X	X							
10	MW-43		1235	Water	2,8	3	X	X	X	X							

Sampler(s): Please Print & Sign: Jakob Trojan + HMI Team

Shipment Method: Drop off @ lab

Required Turnaround Time: ☐ Other ____ ☐ STD 10 Wk Days ☑ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour

Results Due Date:

Relinquished by:	Date: 2-28-25	Time:	Received by:	Notes: NRG CCR - PRIVILEGED & CONFIDENTIAL
Relinquished by:	Date:	Time:	Received by (Laboratory):	Cooler Temp.
Logged by (Laboratory):	Date: 2/28/25	Time: 1400	Checked by (Laboratory):	

QC Package: (Check Box Below)

☐	Level II: Standard QC	X	TRRP-Checklist
☐	Level III: Std QC + Raw Data	☐	TRRP Level IV
☐	Level IV: SW846 CLP-Like		
	Other:		

Preservative Key: 1-HCL 2-HNO3 3-H2SO4 4-NaOH 5-Na2S2O3 6-NaHSO4 7-Other 8-4 degrees C 9-5035

Note: Any changes must be made in writing once samples and COC Form have been submitted to ALS Laboratory Group.

52361 1.5 46657 2.2
[illegible] 1.3 52709 1.8 IR 34

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10450 Stancliff Rd. #210
Houston, Texas 77099
(Tel) 281.530.5656
(Fax) 281.530.5887

Chain of Custody Form

Page 2 of 4

HS25030029
TRC
NRG - CCR Program-APP III

ALS Project Manager:

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order		Project Name	WA Parish CCR Program	A	ICP_TW (B and Ca) - Appendix III
Work Order		Project Number	528472.0000.0000	B	300_W (Cl, SO4) - Appendix III
Company Name	TRC Corporation	Bill To Company	TRC	C	Sub_Fluoride (Sub to ALS Michigan) - Appendix III
Send Report To	Lori Burris	Invoice Attn.	A/P	D	TDS_W 2540C (TDS) - Appendix III
Address	11767 Katy Freeway	Address	11767 Katy Freeway	E	
	Suite 230		Suite 230	F	
City/State/Zip	Houston, TX 77079	City/State/Zip	Houston, TX 77079	G	
Phone	713-244-1000	Phone	713-244-1000	H	
Fax	713-244-1099	Fax	713-244-1099	I	
e-Mail Address	Lburris@trcsolutions.com	e-Mail Address	apinvoiceapproval@trcsolutions.com	J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	MW-44	2-28-25	855	Water	2,8	3	X	X	X	X							
2	MW-46R		755	Water	2,8	3	X	X	X	X							
3	MW-47		1125	Water	2,8	3	X	X	X	X							
4	MW-48		1040	Water	2,8	3	X	X	X	X							
5	MW-50		1035	Water	2,8	3	X	X	X	X							
6	MW-52		945	Water	2,8	3	X	X	X	X							
7	MW-54		810	Water	2,8	3	X	X	X	X							
8	MW-55R		925	Water	2,8	3	X	X	X	X							
9	MW-58		955	Water	2,8	3	X	X	X	X							
10	MW-65		950	Water	2,8	3	X	X	X	X							

Sampler(s): Please Print & Sign: Jacob TRjin Hunt Team [signature]

Shipment Method: Drop off @ lab

Required Turnaround Time: ☐ Other ______ ☐ STD 10 Wk Days ☑ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour

Results Due Date:

Relinquished by:	Date:	Time:	Received by:	Notes:
Jacob [signature]	2-28-25			NRG CCR - PRIVILEGED & CONFIDENTIAL
Relinquished by:	Date:	Time:	Received by (Laboratory):	Cooler Temp.
Logged by (Laboratory):	Date: 2/28/25	Time: 1400	Checked by (Laboratory): [signature]	

QC Package: (Check Box Below)

	Level II: Standard QC	X	TRRP-Checklist
	Level III: Std QC + Raw Data		TRRP Level IV
	Level IV: SW846 CLP-Like		
	Other:		

Preservative Key: 1-HCL 2-HNO3 3-H2SO4 4-NaOH 5-Na2S2O3 6-NaHSO4 7-Other 8-4 degrees C 9-5035

Note: Any changes must be made in writing once samples and COC Form have been submitted to ALS Laboratory Group.

52361 1.5
Blue 1.3
51709 2.0
46657 2.2
52709 1.8
IR34
cf0.0

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Houston, Texas 77099
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Chain of Custody Form

HS25030029
TRC
NRG - CCR Program-APP III

ALS Project Manager:

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order		Project Name	WA Parish CCR Program	A	ICP_TW (B and Ca) - Appendix III
Work Order		Project Number	528472.0000.0000	B	300_W (Cl, SO4) - Appendix III
Company Name	TRC Corporation	Bill To Company	TRC	C	Sub_Fluoride (Sub to ALS Michigan) - Appendix III
Send Report To	Lori Burris	Invoice Attn.	A/P	D	TDS_W 2540C (TDS) - Appendix III
Address	11767 Katy Freeway	Address	11767 Katy Freeway	E	
	Suite 230		Suite 230	F	
City/State/Zip	Houston, TX 77079	City/State/Zip	Houston, TX 77079	G	
Phone	713-244-1000	Phone	713-244-1000	H	
Fax	713-244-1099	Fax	713-244-1099	I	
e-Mail Address	l.burris@trcsolutions.com	e-Mail Address	apinvoiceapproval@trcsolutions.com	J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	MW-36	2-28-25	900	Water	2,8	3	X	X	X	X							
2	MW-37		1040	Water	2,8	3	X	X	X	X							
3	MW-38R		955	Water	2,8	3	X	X	X	X							
4	MW-60		815	Water	2,8	3	X	X	X	X							
5	MW-61R		1135	Water	2,8	3	X	X	X	X							
6	MW-58-MS		955	Water	2,8	3	X	X	X	X							
7	MW-58-MSD		955	Water	2,8	3	X	X	X	X							
8	MW-63-MS		935	Water	2,8	3	X	X	X	X							
9	MW-63-MSD		935	Water	2,8	3	X	X	X	X							
10	Field Blank		1150	Water	2,8	3	X	X	X	X							

Sampler(s): Please Print & Sign: Justin Frijon / HMT Tom Jus

Shipment Method: Drop off @ lab

Required Turnaround Time: ☐ Other ______ ☐ STD 10 Wk Days ☑ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour

Results Due Date:

Relinquished by:	Date:	Time:	Received by:	Notes:
Justin Frijon	2-28-25			NRG CCR - PRIVILEGED & CONFIDENTIAL
Relinquished by:	Date:	Time:	Received by (Laboratory):	Cooler Temp.
Logged by (Laboratory):	Date: 2/28/25	Time: 1400	Checked by (Laboratory):	

QC Package: (Check Box Below)

	Level II: Standard QC	X	TRRP-Checklist
	Level III: Std QC + Raw Data		TRRP Level IV
	Level IV: SW846 CLP-Like		
	Other:		

Preservative Key: 1-HCL 2-HNO3 3-H2SO4 4-NaOH 5-Na2S2O3 6-NaHSO4 7-Other 8-4 degrees C 9-5035

Note: Any changes must be made in writing once samples and COC Form have been submitted to ALS Laboratory Group.

523611 1.5 46457 2.2 1234
Blue 1.3 527091 1.8

☑ ALS Laboratory Group
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Houston, Texas 77099
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(Fax) 281.530.5887

Chain of Custody Form

HS25030029
TRC
NRG - CCR Program-APP III

ALS Project Manager:

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order		Project Name	WA Parish CCR Program	A	ICP_TW (B and Ca) - Appendix III
Work Order		Project Number	528472.0000.0000	B	300_W (Cl, SO4) - Appendix III
Company Name	TRC Corporation	Bill To Company	TRC	C	Sub_Fluoride (Sub to ALS Michigan) - Appendix III
Send Report To	Lori Burris	Invoice Attn.	A/P	D	TDS_W 2540C (TDS) - Appendix III
Address	11767 Katy Freeway	Address	11767 Katy Freeway	E	
	Suite 230		Suite 230	F	
City/State/Zip	Houston, TX 77079	City/State/Zip	Houston, TX 77079	G	
Phone	713-244-1000	Phone	713-244-1000	H	
Fax	713-244-1099	Fax	713-244-1099	I	
e-Mail Address	Lburris@trcsolutions.com	e-Mail Address	apinvoiceapproval@trcsolutions.com	J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	Field Duplicate 1	2-28-25	1100	Water	2,8	3	X	X	X	X							
2	Field Duplicate 2	↓	900	Water	2,8	3	X	X	X	X							
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s): Please Print & Sign [illegible]

Shipment Method: Drop off @ lab

Required Turnaround Time: ☐ Other ______ ☐ STD 10 Wk Days ☑ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour

Results Due Date:

Relinquished by:	Date:	Time:	Received by:
[illegible]	2-28-25		
Relinquished by:	**Date:**	**Time:**	**Received by (Laboratory):**
Logged by (Laboratory):	**Date:**	**Time:**	**Checked by (Laboratory):**
	2/28/25	1400	[illegible]

Notes: NRG CCR - PRIVILEGED & CONFIDENTIAL

Cooler Temp.

QC Package: (Check Box Below)

	Level II: Standard QC	X	TRRP-Checklist
	Level III: Std QC + Raw Data		TRRP Level IV
	Level IV: SW846 CLP-Like		
	Other:		

Preservative Key: 1-HCL 2-HNO3 3-H2SO4 4-NaOH 5-Na2S2O3 6-NaHSO4 7-Other 8-4 degrees C 9-5035

Note: Any changes must be made in writing once samples and COC Form have been submitted to ALS Laboratory Group.

52341 1.5 46457 2.2
Blue 1.3 52709 1.8 1234

10-Mar-2025

Andrew Neir
ALS Environmental
10450 Stancliff Rd
Suite 210
Houston, TX 77099

Re: **HS25030029** Work Order: **25030040**

Dear Andrew,

ALS Environmental received 28 samples on 05-Mar-2025 10:00 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental - Holland and for only the analyses requested.

Sample results are compliant with industry accepted practices and Quality Control results achieved laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 45.

If you have any questions regarding this report, please feel free to contact me:

ADDRESS: 3352 128th Avenue, Holland, MI, USA
PHONE: +1 (616) 399-6070 FAX: +1 (616) 399-6185

Sincerely,

Chelsey Cook

Electronically approved by: Chelsey Cook

Chelsey Cook
Project Manager

Report of Laboratory Analysis

Certificate No: TX: T104704494

ALS Group, USA

Date: *10-Mar-25*

Client:	ALS Environmental
Project:	HS25030029
Work Order:	25030040

TRRP Laboratory Data Package Cover Page

This data package consists of all or some of the following as applicable:

This signature page, the laboratory case narrative, and the following reportable data:

R1 Field chain-of-custody documentation:
R2 Sample identification cross-reference
R3 Test reports (analytical data sheets) for each environmental sample that includes:
- a) Items consistent with NELAC Chapter 5
- b) dilution factors,
- c) preparation methods,
- d) cleanup methods, and
- e) if required for the project, tentatively identified compounds (TICs).

R4 Surrogate recovery data including:
- a) Calculated recovery (%R), and
- b) The laboratory's surrogate QC limits.

R5 Test reports/summary forms for blank samples;
R6 Test reports/summary forms for laboratory control samples (LCSs) including:
- a) LCS spiking amounts,
- b) Calculated %R for each analyte, and
- c) The laboratory's LCS QC limits.

R7 Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
- a) Samples associated with the MS/MSD clearly identified,
- b) MS/MSD spiking amounts,
- c) Concentration of each MS/MSD analyte measured in the parent and spiked samples,
- d) Calculated %Rs and relative percent differences (RPDs), and
- e) The laboratory's MS/MSD QC limits

R8 Laboratory analytical duplicate (if applicable) recovery and precision:
- a) the amount of analyte measured in the duplicate,
- b) the calculated RPD, and
- c) the laboratory's QC limits for analytical duplicates.

R9 List of method quantitation limits (MQLs) for each analyte for each method and matrix;
R10 Other problems or anomalies:
See Case Narrative.

Release Statement: I am responsible for the release of this laboratory data package. This data package has been reviewed by the laboratory and is complete and technically compliant with the requirements of the methods used, except where noted by the laboratory in the attached Case Narrative and QC Summaries. By my signature below, I affirm to the best of my knowledge, all problems/anomalies, observed by the laboratory as having the potential to affect the quality of the data, have been identified, and no information affecting the quality of the data has been knowingly withheld.

Chelsey Cook

Chelsey Cook
Project Manager

WET CHEMISTRY DATA ASSESSMENT CHECKLIST

Wet Chemistry	Batch Number: TITRATOR1_250308A		Instrument ID: TITRATOR1
Method: FL_4500C_W	Work order Number (s): 25030040		
Analyst Name: QN	Date: 03/08/25	Reviewer Name: JB	Date: 3/10/25

	A[1]	Description	Yes	No	NA[2]	NR[3]	ER#[4]
R1	I	Chain-of-Custody					
		1) Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?			X		
		2) Were all departures from standard conditions described in an exception report?			X		
R2	I	**SAMPLE AND QUALITY CONTROL (QC) IDENTIFICATION**					
		1) Are all field sample ID numbers cross-referenced to the laboratory ID numbers?			X		
		2) Are all laboratory ID numbers cross-referenced to the corresponding QC data?			X		
R3	I	**TEST REPORTS**					
		1) Were all samples prepared and analyzed within holding times?	X				
		2) Other than those results < MQL, were all other raw values bracketed by calibration standards?	X				
		3) Were calculations checked by a peer or supervisor?	X				
		4) Were all analyte identifications checked by a peer or supervisor?	X				
		5) Were sample quantitation limits reported for all analytes not detected?	X				
		6) Were all results for soil and sediment samples reported on a dry weight basis?			X		
		7) Was % moisture (or solids) reported for all soil and sediment samples?			X		
		8) If required for the project, TICs reported?			X		
R4	I	**SURROGATE RECOVERY DATA**					
		1) Were surrogates added prior to extraction?			X		
		2) Were surrogate percent recoveries in all samples within the laboratory QC limits?			X		
R5	I	**TEST REPORTS/SUMMMARY FORMS FOR BLANK SAMPLES**					
		1) Were appropriate type(s) of blanks analyzed?	X				
		2) Were blanks analyzed at the appropriate frequency?	X				
		3) Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X				
		4) Were blank concentrations < ½ MQL?	X				
R6	I	**LABORATORY CONTROL SAMPLES (LCS):**					
		1) Were all COCs included in the LCS?	X				
		2) Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X				
		3) Were LCSs analyzed at the required frequency?	X				
		4) Were LCS and LCSD %Rs within the laboratory QC limits?	X				
		5) Does the detectability data document the laboratory's capability to detect the COCs at the MDL used to calculate the SQLs?	X				
		6) Was the LCSD RPD within QC limits?	X				
R7	I	**MATRIX SPIKE (MS) AND MATRIX SPIKE DUPLICATE (MSD) DATA**					
		1) Were the project or method specified analytes included in the MS and MSD?	X				
		2) Were MS/MSD analyzed at the appropriate frequency?	X				
		3) Were MS and MSD %Rs within the laboratory QC limits?	X				
		4) Were MS/MSD RPDs within laboratory QC limits?	X				
R8	I	**ANALYTICAL DUPLICATE DATA (IF REQUIRED)**					
		1) Were appropriate analytical duplicates analyzed for each matrix?	X				
		2) Were analytical duplicates analyzed at the appropriate frequency?	X				
		3) Were RPDs or relative standard deviations within the laboratory QC limits?	X				
R9	I	**METHOD QUANTITATION LIMITS (MQLS):**					
		1) Are the MQLs for each method analyte listed and included in the laboratory data package?	X				
		2) Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X				
		3) Are unadjusted MQLs included in the laboratory data package?			X		
R10	I	**OTHER PROBLEMS/ANOMALIES**					
		1) Are all known problems/anomalies/special conditions noted in this LRC and ER?	X				
		2) Were all necessary corrective actions performed for the reported data?	X				
		3) If requested, is the justification for elevated SQLs documented?			X		

S1	I	**INITIAL CALIBRATION (ICAL)**					
		1) Were response factors (RFs) and/or relative response factors (RRFs) for each analyte within the QC limits?			X		
		2) Were percent RSDs or correlation coefficient criteria met?	X				
		3) Was the number of standards recommended in the method used for all analytes?	X				
		4) Were all points generated between the lowest and highest standard used to calculate the curve?	X				
		5) Are ICAL data available for all instruments used?	X				
		6) Has the initial calibration curve been verified using an appropriate second source standard?	X				
S2	I	**INITIAL AND CONTINUING CALIBRATION VERIFICATION (ICCV AND CCV) AND**					
		1) Was the CCV analyzed at the method-required frequency?	X				
		2) Were percent differences for each analyte within the method-required QC limits?	X				
		3) Was the ICAL curve verified for each analyte?	X				
		4) Was the absolute value of the analyte concentration in the organic CCB < MDL?	X				
S3	I	**MASS SPECTRAL TUNING:**					
		1) Was the appropriate compound for the method used for tuning?			X		
		2) Were ion abundance data within the method-required QC limits?			X		
S4	I	**INTERNAL STANDARDS (IS):**					
		Were IS area counts within the method-required QC limits?			X		
S5	I	**RAW DATA**					
		1) Were the raw data (e.g., chromatograms, spectral data) reviewed by an analyst?	X				
		2) Were data associated with manual integrations flagged on the raw data?	X				
S6	I	**DUAL COLUMN CONFIRMATION (IF REQUIRED)**					
		Did dual column confirmation results meet the method-required QC?			X		
S7	I	**TENTATIVELY IDENTIFIED COMPOUNDS (TICS):**					
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X		
S8	I	**INTERFERENCE CHECK SAMPLE (ICS) RESULTS:**					
		Were percent recoveries within method QC limits?			X		
S9	I	**SERIAL DILUTIONS, POST DIGESTION SPIKES, AND METHOD OF STANDARD**					
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?			X		
S10	I	**PROFICIENCY TEST REPORTS:**					
		Are proficiency testing or inter-laboratory comparison results on file?	X				
S11	I	**METHOD DETECTION LIMIT (MDL) STUDIES**					
		1) Was a MDL study performed for each reported analyte?	X				
		2) Is the MDL either adjusted or supported by the analysis of DCSs?	X				
S12	I	**STANDARDS DOCUMENTATION**					
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X				
S13	I	**COMPOUND/ANALYTE IDENTIFICATION PROCEDURES**					
		Are the procedures for compound/analyte identification documented?	X				
S14	I	**DEMONSTRATION OF ANALYST COMPETENCY (DOC)**					
		1) Was DOC conducted consistent with NELAC 5C or ISO/IEC 4.2.2?	X				
		2) Is documentation of the analyst's competency up-to-date and on file?	X				
S15	I	**VERIFICATION/VALIDATION DOCUMENTATION FOR METHODS**					
		Are all the methods used to generate the data documented, verified, and validated, where applicable, (NELAC 5.10.2 or ISO/IEC 17025 Section 5.4.5)?	X				
S16	I	**LABORATORY STANDARD OPERATING PROCEDURES (SOPS):**					
		Are laboratory SOPs current and on file for each method performed?	X				

1 O = organic analyses; I = inorganic analyses (and general chemistry, when applicable).
2 NA = Not applicable.
3 NR = Not Reviewed.
4 ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

WET CHEMISTRY DATA ASSESSMENT CHECKLIST

Wet Chemistry	Batch Number:	

ER #[1]	DESCRIPTION
1	
2	
3	
4	
5	
6	

1 ER# = Exception Report identification number (an Exception Report should be completed for an item if “NR” or “No” is checked on the LRC)

ALS Group, USA

Date: 10-Mar-25

Client: ALS Environmental
Project: HS25030029
Work Order: **25030040**

Work Order Sample Summary

Lab Samp ID	Client Sample ID	Matrix	Tag Number	Collection Date	Date Received	Hold
25030040-01	HS25030029-01	Water		2/28/2025 08:25	3/5/2025 10:00	☐
25030040-02	HS25030029-02	Water		2/28/2025 11:20	3/5/2025 10:00	☐
25030040-03	HS25030029-03	Water		2/28/2025 10:10	3/5/2025 10:00	☐
25030040-04	HS25030029-04	Water		2/28/2025 09:00	3/5/2025 10:00	☐
25030040-05	HS25030029-05	Water		2/28/2025 09:35	3/5/2025 10:00	☐
25030040-06	HS25030029-06	Water		2/28/2025 10:45	3/5/2025 10:00	☐
25030040-07	HS25030029-07	Water		2/28/2025 11:45	3/5/2025 10:00	☐
25030040-08	HS25030029-08	Water		2/28/2025 11:10	3/5/2025 10:00	☐
25030040-09	HS25030029-09	Water		2/28/2025 11:05	3/5/2025 10:00	☐
25030040-10	HS25030029-10	Water		2/28/2025 12:35	3/5/2025 10:00	☐
25030040-11	HS25030029-11	Water		2/28/2025 08:55	3/5/2025 10:00	☐
25030040-12	HS25030029-12	Water		2/28/2025 07:55	3/5/2025 10:00	☐
25030040-13	HS25030029-13	Water		2/28/2025 11:25	3/5/2025 10:00	☐
25030040-14	HS25030029-14	Water		2/28/2025 10:40	3/5/2025 10:00	☐
25030040-15	HS25030029-15	Water		2/28/2025 10:35	3/5/2025 10:00	☐
25030040-16	HS25030029-16	Water		2/28/2025 09:45	3/5/2025 10:00	☐
25030040-17	HS25030029-17	Water		2/28/2025 08:10	3/5/2025 10:00	☐
25030040-18	HS25030029-18	Water		2/28/2025 09:05	3/5/2025 10:00	☐
25030040-19	HS25030029-19	Water		2/28/2025 09:55	3/5/2025 10:00	☐
25030040-20	HS25030029-20	Water		2/28/2025 09:50	3/5/2025 10:00	☐
25030040-21	HS25030029-21	Water		2/28/2025 09:00	3/5/2025 10:00	☐
25030040-22	HS25030029-22	Water		2/28/2025 10:40	3/5/2025 10:00	☐
25030040-23	HS25030029-23	Water		2/28/2025 09:55	3/5/2025 10:00	☐
25030040-24	HS25030029-24	Water		2/28/2025 08:15	3/5/2025 10:00	☐
25030040-25	HS25030029-25	Water		2/28/2025 11:35	3/5/2025 10:00	☐
25030040-26	HS25030029-26 FLD BLK	Water		2/28/2025 11:50	3/5/2025 10:00	☐
25030040-27	HS25030029-27 FLD DUP	Water		2/28/2025 11:00	3/5/2025 10:00	☐
25030040-28	HS25030029-28 FLD DUP	Water		2/28/2025 09:00	3/5/2025 10:00	☐

Client: ALS Environmental
Project: HS25030029
WorkOrder: **25030040**

QUALIFIERS, ACRONYMS, UNITS

Qualifier	Description
*	Value exceeds Regulatory Limit
**	Estimated Value
a	Analyte is non-accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
Hr	BOD/CBOD - Sample was reset outside Hold Time, value should be considered estimated.
J	Analyte is present at an estimated concentration between the MDL and Report Limit
n	Analyte accreditation is not offered
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL
X	Analyte was detected in the Method Blank between the MDL and Reporting Limit, sample results may exhibit background or reagent contamination at the observed level.

Acronym	Description
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
LOD	Limit of Detection (see MDL)
LOQ	Limit of Quantitation (see PQL)
MBLK	Method Blank
MDL	Method Detection Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PQL	Practical Quantitation Limit
RPD	Relative Percent Difference
TDL	Target Detection Limit
TNTC	Too Numerous To Count
A	APHA Standard Methods
D	ASTM
E	EPA
SW	SW-846 Update III

Units Reported	Description
mg/L	Milligrams per Liter

Client:	ALS Environmental
Project:	HS25030029
Work Order:	25030040

Case Narrative

Samples for the above noted Work Order were received on 03/05/2025. The attached "Sample Receipt Checklist" documents the status of custody seals, container integrity, preservation, and temperature compliance.

Samples were analyzed according to the analytical methodology previously transmitted in the "Work Order Acknowledgement". Methodologies are also documented in the "Analytical Result" section for each sample. Quality control results are listed in the "QC Report" section. Sample association for the reported quality control is located at the end of each batch summary. If applicable, results are appropriately qualified in the Analytical Result and QC Report sections. The "Qualifiers" section documents the various qualifiers, units, and acronyms utilized in reporting. A copy of the laboratory's scope of accreditation is available upon request.

With the following exceptions, all sample analyses achieved analytical criteria.

Wet Chemistry:
No deviations or anomalies were noted.

ALS Group, USA

10-Mar-25

Work Order: 25030040
Client: ALS Environmental
Project: HS25030029

DATES REPORT

Sample ID	Client Sample ID	Matrix	Collection Date	TCLP Date	Prep Date	Analysis Date
Batch ID R418576	**Test Name:** Fluoride					
25030040-01 ^	HS25030029-01	Water	2/28/2025 8:25:00 AM			3/8/2025 12:47 PM
25030040-02 ^	HS25030029-02		2/28/2025 11:20:00 AM			3/8/2025 12:47 PM
25030040-03 ^	HS25030029-03		2/28/2025 10:10:00 AM			3/8/2025 12:47 PM
25030040-04 ^	HS25030029-04		2/28/2025 9:00:00 AM			3/8/2025 12:47 PM
25030040-05 ^	HS25030029-05		2/28/2025 9:35:00 AM			3/8/2025 12:47 PM
25030040-06 ^	HS25030029-06		2/28/2025 10:45:00 AM			3/8/2025 12:47 PM
25030040-07 ^	HS25030029-07		2/28/2025 11:45:00 AM			3/8/2025 12:47 PM
25030040-08 ^	HS25030029-08		2/28/2025 11:10:00 AM			3/8/2025 12:47 PM
25030040-09 ^	HS25030029-09		2/28/2025 11:05:00 AM			3/8/2025 12:47 PM
25030040-10 ^	HS25030029-10		2/28/2025 12:35:00 PM			3/8/2025 12:47 PM
25030040-11 ^	HS25030029-11		2/28/2025 8:55:00 AM			3/8/2025 12:47 PM
25030040-12 ^	HS25030029-12		2/28/2025 7:55:00 AM			3/8/2025 12:47 PM
25030040-13 ^	HS25030029-13		2/28/2025 11:25:00 AM			3/8/2025 12:47 PM
25030040-14 ^	HS25030029-14		2/28/2025 10:40:00 AM			3/8/2025 12:47 PM

Work Order: 25030040
Client: ALS Environmental
Project: HS25030029

DATES REPORT

Sample ID	Client Sample ID	Matrix	Collection Date	TCLP Date	Prep Date	Analysis Date

Batch ID R418576 **Test Name:** Fluoride

Sample ID	Client Sample ID	Matrix	Collection Date	TCLP Date	Prep Date	Analysis Date
25030040-15 ^	HS25030029-15	Water	2/28/2025 10:35:00 AM			3/8/2025 12:47 PM
25030040-16 ^	HS25030029-16		2/28/2025 9:45:00 AM			3/8/2025 12:47 PM
25030040-17 ^	HS25030029-17		2/28/2025 8:10:00 AM			3/8/2025 12:47 PM
25030040-18 ^	HS25030029-18		2/28/2025 9:05:00 AM			3/8/2025 12:47 PM
25030040-19 ^	HS25030029-19		2/28/2025 9:55:00 AM			3/8/2025 12:47 PM
25030040-20 ^	HS25030029-20		2/28/2025 9:50:00 AM			3/8/2025 12:47 PM
25030040-21 ^	HS25030029-21		2/28/2025 9:00:00 AM			3/8/2025 12:47 PM
25030040-22 ^	HS25030029-22		2/28/2025 10:40:00 AM			3/8/2025 12:47 PM
25030040-23 ^	HS25030029-23		2/28/2025 9:55:00 AM			3/8/2025 12:47 PM
25030040-24 ^	HS25030029-24		2/28/2025 8:15:00 AM			3/8/2025 12:47 PM
25030040-25 ^	HS25030029-25		2/28/2025 11:35:00 AM			3/8/2025 12:47 PM
25030040-26 ^	HS25030029-26 FLD BLK		2/28/2025 11:50:00 AM			3/8/2025 12:47 PM
25030040-27 ^	HS25030029-27 FLD DUP		2/28/2025 11:00:00 AM			3/8/2025 12:47 PM
25030040-28 ^	HS25030029-28 FLD DUP		2/28/2025 9:00:00 AM			3/8/2025 12:47 PM

ALS Group, USA

Date: *10-Mar-25*

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-01
Collection Date: 2/28/2025 08:25 AM

Work Order: 25030040
Lab ID: 25030040-01
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **QTN**
Fluoride	**0.110**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-02	**Lab ID:**	25030040-02
Collection Date:	2/28/2025 11:20 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.110**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-03
Collection Date: 2/28/2025 10:10 AM

Work Order: 25030040
Lab ID: 25030040-03
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.140**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-04	**Lab ID:**	25030040-04
Collection Date:	2/28/2025 09:00 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **QTN**
Fluoride	**0.180**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-05
Collection Date: 2/28/2025 09:35 AM

Work Order: 25030040
Lab ID: 25030040-05
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.280**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-06	**Lab ID:**	25030040-06
Collection Date:	2/28/2025 10:45 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.190**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental
Project:	HS25030029
Sample ID:	HS25030029-07
Collection Date:	2/28/2025 11:45 AM
Work Order:	25030040
Lab ID:	25030040-07
Matrix:	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.320**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-08
Collection Date: 2/28/2025 11:10 AM

Work Order: 25030040
Lab ID: 25030040-08
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.320**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-09
Collection Date: 2/28/2025 11:05 AM

Work Order: 25030040
Lab ID: 25030040-09
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.630**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-10
Collection Date: 2/28/2025 12:35 PM

Work Order: 25030040
Lab ID: 25030040-10
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.610**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-11	**Lab ID:**	25030040-11
Collection Date:	2/28/2025 08:55 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.490**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-12
Collection Date: 2/28/2025 07:55 AM

Work Order: 25030040
Lab ID: 25030040-12
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.400**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-13	**Lab ID:**	25030040-13
Collection Date:	2/28/2025 11:25 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.450**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-14
Collection Date: 2/28/2025 10:40 AM

Work Order: 25030040
Lab ID: 25030040-14
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **QTN**
Fluoride	**0.750**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-15	**Lab ID:**	25030040-15
Collection Date:	2/28/2025 10:35 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **QTN**
Fluoride	**0.530**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-16
Collection Date: 2/28/2025 09:45 AM
Work Order: 25030040
Lab ID: 25030040-16
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.580**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-17
Collection Date: 2/28/2025 08:10 AM

Work Order: 25030040
Lab ID: 25030040-17
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.520**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-18	**Lab ID:**	25030040-18
Collection Date:	2/28/2025 09:05 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.760**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-19	**Lab ID:**	25030040-19
Collection Date:	2/28/2025 09:55 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **QTN**
Fluoride	**0.510**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-20	**Lab ID:**	25030040-20
Collection Date:	2/28/2025 09:50 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **QTN**
Fluoride	**0.180**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-21	**Lab ID:**	25030040-21
Collection Date:	2/28/2025 09:00 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.440**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-22	**Lab ID:**	25030040-22
Collection Date:	2/28/2025 10:40 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.260**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-23
Collection Date: 2/28/2025 09:55 AM

Work Order: 25030040
Lab ID: 25030040-23
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **QTN**
Fluoride	**0.210**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-24
Collection Date: 2/28/2025 08:15 AM

Work Order: 25030040
Lab ID: 25030040-24
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **QTN**
Fluoride	**0.130**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-25
Collection Date: 2/28/2025 11:35 AM

Work Order: 25030040
Lab ID: 25030040-25
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.170**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client:	ALS Environmental		
Project:	HS25030029	**Work Order:**	25030040
Sample ID:	HS25030029-26 FLD BLK	**Lab ID:**	25030040-26
Collection Date:	2/28/2025 11:50 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **QTN**
Fluoride	U		0.058	0.10	mg/L	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-27 FLD DUP
Collection Date: 2/28/2025 11:00 AM

Work Order: 25030040
Lab ID: 25030040-27
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.410**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *10-Mar-25*

Client: ALS Environmental
Project: HS25030029
Sample ID: HS25030029-28 FLD DUP
Collection Date: 2/28/2025 09:00 AM

Work Order: 25030040
Lab ID: 25030040-28
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **QTN**
Fluoride	**0.470**		**0.058**	**0.10**	**mg/L**	1	3/8/2025 12:47

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: 10-Mar-25

WorkOrder: 25030040
InstrumentID: Titrator 1
Test Code: FL_4500C_W
Test Number: A4500-F C-11
Test Name: Fluoride

METHOD DETECTION / REPORTING LIMITS

Matrix: Water **Units:** mg/L

Type	Analyte	CAS	DCS	MDL	Unadjusted MQL
A	Fluoride	16984-48-8	0	0.058	0.10

ALS Group, USA

Date: 10-Mar-25

Client: ALS Environmental

Work Order: 25030040

Project: HS25030029

QC BATCH REPORT

Batch ID: **R418576A** Instrument ID **Titrator 1** Method: **A4500-F C-11**

MBLK Sample ID: **MB-R418576-R418576A** Units: **mg/L** Analysis Date: **3/8/2025 12:47 PM**

Client ID: Run ID: **TITRATOR 1_250308A** SeqNo: **11411800** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	U	0.058	0.10								

LCS Sample ID: **LCS-R418576-R418576A** Units: **mg/L** Analysis Date: **3/8/2025 12:47 PM**

Client ID: Run ID: **TITRATOR 1_250308A** SeqNo: **11411801** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.14	0.058	0.10	5	0	103	90-111	0			

MS Sample ID: **25030040-05A MS** Units: **mg/L** Analysis Date: **3/8/2025 12:47 PM**

Client ID: **HS25030029-05** Run ID: **TITRATOR 1_250308A** SeqNo: **11411813** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.39	0.058	0.10	5	0.28	102	90-111	0			

MSD Sample ID: **25030040-05A MSD** Units: **mg/L** Analysis Date: **3/8/2025 12:47 PM**

Client ID: **HS25030029-05** Run ID: **TITRATOR 1_250308A** SeqNo: **11411814** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.39	0.058	0.10	5	0.28	102	90-111	5.39	0	20	

The following samples were analyzed in this batch:

25030040-01A	25030040-02A	25030040-03A
25030040-04A	25030040-05A	25030040-06A
25030040-07A	25030040-08A	25030040-09A
25030040-10A	25030040-11A	25030040-12A
25030040-13A	25030040-14A	

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

Client: ALS Environmental
Work Order: 25030040
Project: HS25030029

QC BATCH REPORT

Batch ID: **R418576B** Instrument ID **Titrator 1** Method: **A4500-F C-11**

MBLK Sample ID: **MB-R418576-R418576B** Units: **mg/L** Analysis Date: **3/8/2025 12:47 PM**
Client ID: Run ID: **TITRATOR 1_250308A** SeqNo: **11411824** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	U	0.058	0.10								

LCS Sample ID: **LCS-R418576-R418576B** Units: **mg/L** Analysis Date: **3/8/2025 12:47 PM**
Client ID: Run ID: **TITRATOR 1_250308A** SeqNo: **11411825** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.05	0.058	0.10	5	0	101	90-111	0			

MS Sample ID: **25030040-19A MS** Units: **mg/L** Analysis Date: **3/8/2025 12:47 PM**
Client ID: **HS25030029-19** Run ID: **TITRATOR 1_250308A** SeqNo: **11411831** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.46	0.058	0.10	5	0.51	99	90-111	0			

MSD Sample ID: **25030040-19A MSD** Units: **mg/L** Analysis Date: **3/8/2025 12:47 PM**
Client ID: **HS25030029-19** Run ID: **TITRATOR 1_250308A** SeqNo: **11411832** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.51	0.058	0.10	5	0.51	100	90-111	5.46	0.912	20	

The following samples were analyzed in this batch:

25030040-15A	25030040-16A	25030040-17A
25030040-18A	25030040-19A	25030040-20A
25030040-21A	25030040-22A	25030040-23A
25030040-24A	25030040-25A	25030040-26A
25030040-27A	25030040-28A	

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

25030040

ALS - HOUSTON: ALS Environmental

Project: HS 28198

10450 Stancliff Rd, Ste 210
Houston, TX 77099
T: +1 281 530 5656
F: +1 281 530 5887
www.alsglobal.com

Subcontract Chain of Custody

SAMPLING STATE: Texas

COC ID: 28198

SUBCONTRACT TO:

ALS Group USA, Corp.
3352 - 128th Ave
Holland, MI 494249263

Phone: +1 616 399 6070

CUSTOMER INFORMATION:

Company: ALS Houston
Contact: Andy C. Neir
Address: 10450 Stancliff Rd, Ste 210
Phone: +1 281 530 5656
Email: Andrew.Neir@ALSGlobal.com
Alternate Contact: Jumoke M. Lawal
Email: jumoke.lawal@alsglobal.com

INVOICE INFORMATION:

Company: ALS Houston
Contact: Accounts Payable
Address: 10450 Stancliff Rd, Ste 210
Phone: +1 281 530 5656
Reference: HS25030029
TSR: Ron Martino

	LAB SAMPLE ID / ANALYSIS REQUESTED	CLIENT SAMPLE ID	MATRIX	COLLECT DATE / DUE DATE
1.	**HS25030029-01**	**MW-39R**	**Water**	**28 Feb 2025 08:25**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
2.	**HS25030029-02**	**MW-40**	**Water**	**28 Feb 2025 11:20**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
3.	**HS25030029-03**	**MW-41**	**Water**	**28 Feb 2025 10:10**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
4.	**HS25030029-04**	**MW-62**	**Water**	**28 Feb 2025 09:00**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
5.	**HS25030029-05**	**MW-63**	**Water**	**28 Feb 2025 09:35**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
6.	**HS25030029-06**	**MW-64**	**Water**	**28 Feb 2025 10:45**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
7.	**HS25030029-07**	**MW-23R**	**Water**	**28 Feb 2025 11:45**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
8.	**HS25030029-08**	**MW-28D**	**Water**	**28 Feb 2025 11:10**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
9.	**HS25030029-09**	**MW-42**	**Water**	**28 Feb 2025 11:05**

Subcontract Chain of Custody

SAMPLING STATE: **Texas** **COC ID: 28198**

	LAB SAMPLE ID / ANALYSIS REQUESTED	CLIENT SAMPLE ID	MATRIX	COLLECT DATE / DUE DATE
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
10.	**HS25030029-10**	**MW-43**	**Water**	**28 Feb 2025 12:35**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
11.	**HS25030029-11**	**MW-44**	**Water**	**28 Feb 2025 08:55**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
12.	**HS25030029-12**	**MW-46R**	**Water**	**28 Feb 2025 07:55**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
13.	**HS25030029-13**	**MW-47**	**Water**	**28 Feb 2025 11:25**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
14.	**HS25030029-14**	**MW-48**	**Water**	**28 Feb 2025 10:40**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
15.	**HS25030029-15**	**MW-50**	**Water**	**28 Feb 2025 10:35**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
16.	**HS25030029-16**	**MW-52**	**Water**	**28 Feb 2025 09:45**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
17.	**HS25030029-17**	**MW-54**	**Water**	**28 Feb 2025 08:10**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
18.	**HS25030029-18**	**MW-55R**	**Water**	**28 Feb 2025 09:05**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
19.	**HS25030029-19**	**MW-58**	**Water**	**28 Feb 2025 09:55**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
20.	**HS25030029-20**	**MW-65**	**Water**	**28 Feb 2025 09:50**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
21.	**HS25030029-21**	**MW-36**	**Water**	**28 Feb 2025 09:00**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
22.	**HS25030029-22**	**MW-37**	**Water**	**28 Feb 2025 10:40**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
23.	**HS25030029-23**	**MW-38R**	**Water**	**28 Feb 2025 09:55**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
24.	**HS25030029-24**	**MW-60**	**Water**	**28 Feb 2025 08:15**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025

Subcontract Chain of Custody

SAMPLING STATE: **Texas** **COC ID: 28198**

	LAB SAMPLE ID / ANALYSIS REQUESTED	CLIENT SAMPLE ID	MATRIX	COLLECT DATE / DUE DATE
25.	**HS25030029-25**	**MW-61R**	**Water**	**28 Feb 2025 11:35**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
26.	**HS25030029-26**	**FIELD BLANK**	**Water**	**28 Feb 2025 11:50**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
27.	**HS25030029-27**	**FIELD DUPLICATE 1**	**Water**	**28 Feb 2025 11:00**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025
28.	**HS25030029-28**	**FIELD DUPLICATE 2**	**Water**	**28 Feb 2025 09:00**
	Fluoride by ISE 4500. EQuis EDD			07 Mar 2025

Comments: Please analyze for the analysis listed above.
Send report to the emails shown above.

QC Level: TRRP LRC (TRRP checklist only+Level II (normal))

Relinquished By: ______ Date/Time: 3/3/25 1800

Received By: FedEx 3/5/25 1000 Brittany Hagwood Date/Time: 3/5/25 1000

Logged(s): BH 3/5/25 1639 Temperature(s): IR6 2.9C

ALS Group, USA
Holland, Michigan

Sample Receipt Checklist

Client Name: **ALS - HOUSTON**
Date/Time Received: **05-Mar-25 10:00**
Work Order: **25030040**
Received by: **BYH**

Checklist completed by: Brittany Hayward (eSignature) — Date: 05-Mar-25
Reviewed by: Chelsey Cook (eSignature) — Date: 07-Mar-25

Matrices: WATER
Carrier name: FedEx

	Yes	No	
Shipping container/cooler in good condition?	✔	☐	Not Present ☐
Custody seals intact on shipping container/cooler?	✔	☐	Not Present ☐
Custody seals intact on sample bottles?	☐	☐	Not Present ✔
Chain of custody present?	✔	☐	
Chain of custody signed when relinquished and received?	✔	☐	
Chain of custody agrees with sample labels?	✔	☐	
Samples in proper container/bottle?	✔	☐	
Sample containers intact?	✔	☐	
Sufficient sample volume for indicated test?	✔	☐	
All samples received within holding time?	✔	☐	
Container/Temp Blank temperature in compliance?	✔	☐	
Sample(s) received on ice?	✔	☐	

Temperature(s)/Thermometer(s): 2.9/2.9 C | IR6
Cooler(s)/Kit(s):
Date/Time sample(s) sent to storage: 3/5/2025 4:29:46 PM

	Yes	No	
Water - VOA vials have zero headspace?	☐	☐	No VOA vials submitted ✔
Water - pH acceptable upon receipt?	✔	☐	N/A ☐
pH adjusted?	☐	✔	N/A ☐

pH adjusted by: -

Login Notes:

Client Contacted:
Date Contacted:
Person Contacted:
Contacted By:
Regarding:

Comments:

CorrectiveAction:

10450 Stancliff Rd. Suite 210
Houston, TX 77099
T: +1 281 530 5656
F: +1 281 530 5887

April 04, 2025

Lori Burris
TRC
11767 Katy Freeway
Suite 230
Houston, TX 77079

Work Order: **HS25031217**

Laboratory Results for: **NRG CCR PROGRAM APP III**

Dear Lori Burris,

ALS Environmental received 4 sample(s) on Mar 26, 2025 for the analysis presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Generated By: JUMOKE.LAWAL
Andy C. Neir

Client:	TRC	**TRRP Laboratory Data Package Cover Page**
Project:	NRG CCR PROGRAM APP III	
WorkOrder:	**HS25031217**	

This data package consists of all or some of the following as applicable:

This signature page, the laboratory review checklist, and the following reportable data:

R1 Field chain-of-custody documentation;

R2 Sample identification cross-reference;

R3 Test reports (analytical data sheets) for each environmental sample that includes:
a) Items consistent with NELAC Chapter 5,
b) dilution factors,
c) preparation methods,
d) cleanup methods, and
e) if required for the project, tentatively identified compounds (TICs).

R4 Surrogate recovery data including:
a) Calculated recovery (%R), and
b) The laboratory's surrogate QC limits.

R5 Test reports/summary forms for blank samples;

R6 Test reports/summary forms for laboratory control samples (LCSs) including:
a) LCS spiking amounts,
b) Calculated %R for each analyte, and
c)The laboratory's LCS QC limits.

R7 Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
a) Samples associated with the MS/MSD clearly identified,
b) MS/MSD spiking amounts,
c) Concentration of each MS/MSD analyte measured in the parent and spiked samples,
d) Calculated %Rs and relative percent differences (RPDs), and
e) The laboratory's MS/MSD QC limits.

R8 Laboratory analytical duplicate (if applicable) recovery and precision:
a) the amount of analyte measured in the duplicate,
b) the calculated RPD, and
c) the laboratory's QC limits for analytical duplicates.

R9 List of method quantitation limits (MQLs) and detectability check sample results for each analyte for each method and matrix.

R10 Other problems or anomalies.
The Exception Report for each "No" or "Not Reviewed (NR)" item in Laboratory Review Checklist and for each analyte, matrix, and method for which the laboratory does not hold NELAC accreditation under the Texas Laboratory Accreditation Program.

Client:	TRC	**TRRP Laboratory Data Package Cover Page**
Project:	NRG CCR PROGRAM APP III	
WorkOrder:	**HS25031217**	

Release Statement: I am responsible for the release of this laboratory data package. This laboratory is NELAC accredited under the Texas Laboratory Accreditation Program for all the methods, analytes and matrices reported in this data package except as noted in the Exception Reports. The data have been reviewed and are technically compliant with the requirements of the methods used, except where noted by the laboratory in the attached exception reports. By my signature below, I affirm to the best of my knowledge, all problems/anomalies, observed by the laboratory have been identified by the laboratory in the Laboratory Review Checklist, and no information affecting the quality of the data has been knowingly withheld.

Check, if applicable: [NA] This laboratory meets an exception under 30 TAC §25.6 and was last inspected by [ ] TCEQ or [ ] _______________ on (enter date of last inspection). Any findings affecting the data in this laboratory data package are noted in the Exception Reports herein. The official signing the cover page of the report in which these data are used is responsible for releasing this data package and is by signature affirming the above release statement is true.

Andy C. Neir

Laboratory Review Checklist: Reportable Data

Laboratory Name: ALS Laboratory Group	LRC Date: 04/04/2025
Project Name: NRG CCR PROGRAM APP III	Laboratory Job Number: HS25031217
Reviewer Name: Andy Neir	Prep Batch Number(s): 226061,R509774,R509909,R510369

#[1]	A[2]	Description	Yes	No	NA[3]	NR[4]	ER#[5]
R1	OI	**Chain-of-custody (C-O-C)**					
		Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?	X				
		Were all departures from standard conditions described in an exception report?	X				
R2	OI	**Sample and quality control (QC) identification**					
		Are all field sample ID numbers cross-referenced to the laboratory ID numbers?	X				
		Are all laboratory ID numbers cross-referenced to the corresponding QC data?	X				
R3	OI	**Test reports**					
		Were all samples prepared and analyzed within holding times?	X				
		Other than those results < MQL, were all other raw values bracketed by calibration standards?	X				
		Were calculations checked by a peer or supervisor?	X				
		Were all analyte identifications checked by a peer or supervisor?	X				
		Were sample detection limits reported for all analytes not detected?	X				
		Were all results for soil and sediment samples reported on a dry weight basis?			X		
		Were % moisture (or solids) reported for all soil and sediment samples?			X		
		Were bulk soils/solids samples for volatile analysis extracted with methanol per SW-846 Method 5035?			X		
		If required for the project, TICs reported?			X		
R4	O	**Surrogate recovery data**					
		Were surrogates added prior to extraction?			X		
		Were surrogate percent recoveries in all samples within the laboratory QC limits?			X		
R5	OI	**Test reports/summary forms for blank samples**					
		Were appropriate type(s) of blanks analyzed?	X				
		Were blanks analyzed at the appropriate frequency?	X				
		Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X				
		Were blank concentrations < MQL?	X				
R6	OI	**Laboratory control samples (LCS):**					
		Were all COCs included in the LCS?	X				
		Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X				
		Were LCSs analyzed at the required frequency?	X				
		Were LCS (and LCSD, if applicable) %Rs within the laboratory QC limits?	X				
		Does the detectability data document the laboratory's capability to detect the COCs at the MDL used to calculate the SDLs?	X				
		Was the LCSD RPD within QC limits?	X				
R7	OI	**Matrix spike (MS) and matrix spike duplicate (MSD) data**					
		Were the project/method specified analytes included in the MS and MSD?	X				
		Were MS/MSD analyzed at the appropriate frequency?	X				
		Were MS (and MSD, if applicable) %Rs within the laboratory QC limits?		X			1
		Were MS/MSD RPDs within laboratory QC limits?	X				
R8	OI	**Analytical duplicate data**					
		Were appropriate analytical duplicates analyzed for each matrix?	X				
		Were analytical duplicates analyzed at the appropriate frequency?	X				
		Were RPDs or relative standard deviations within the laboratory QC limits?	X				
R9	OI	**Method quantitation limits (MQLs):**					
		Are the MQLs for each method analyte included in the laboratory data package?	X				
		Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X				
		Are unadjusted MQLs and DCSs included in the laboratory data package?	X				
R10	OI	**Other problems/anomalies**					
		Are all known problems/anomalies/special conditions noted in this LRC and ER?	X				
		Were all necessary corrective actions performed for the reported data?	X				
		Was applicable and available technology used to lower the SDL and minimize the matrix interference affects on the sample results?	X				
		Is the laboratory NELAC-accredited under the Texas Laboratory Program for the analytes, matrices and methods associated with this laboratory data package?	X				

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);NA = Not Applicable; NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

Laboratory Review Checklist: Supporting Data							
Laboratory Name: ALS Laboratory Group			LRC Date: 04/04/2025				
Project Name: NRG CCR PROGRAM APP III			Laboratory Job Number: HS25031217				
Reviewer Name: Andy Neir			Prep Batch Number(s): 226061,R509774,R509909,R510369				
#[1]	**A[2]**	**Description**	**Yes**	**No**	**NA[3]**	**NR[4]**	**ER#[5]**
S1	OI	**Initial calibration (ICAL)**					
		Were response factors and/or relative response factors for each analyte within QC limits?	X				
		Were percent RSDs or correlation coefficient criteria met?	X				
		Was the number of standards recommended in the method used for all analytes?	X				
		Were all points generated between the lowest and highest standard used to calculate the curve?	X				
		Are ICAL data available for all instruments used?	X				
		Has the initial calibration curve been verified using an appropriate second source standard?	X				
S2	OI	**Initial and continuing calibration verification (ICCV and CCV) and continuing calibration blank (CCB)**					
		Was the CCV analyzed at the method-required frequency?	X				
		Were percent differences for each analyte within the method-required QC limits?	X				
		Was the ICAL curve verified for each analyte?	X				
		Was the absolute value of the analyte concentration in the inorganic CCB < MDL?		X			2
S3	O	**Mass spectral tuning:**					
		Was the appropriate compound for the method used for tuning?	X				
		Were ion abundance data within the method-required QC limits?	X				
S4	O	**Internal standards (IS):**					
		Were IS area counts and retention times within the method-required QC limits?	X				
S5	OI	**Raw data** (NELAC section 1 appendix A glossary, and section 5.12 or ISO/IEC 17025 section					
		Were the raw data (for example, chromatograms, spectral data) reviewed by an analyst?	X				
		Were data associated with manual integrations flagged on the raw data?	X				
S6	O	**Dual column confirmation**					
		Did dual column confirmation results meet the method-required QC?			X		
S7	O	**Tentatively identified compounds (TICs):**					
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X		
S8	I	**Interference Check Sample (ICS) results:**					
		Were percent recoveries within method QC limits?	X				
S9	I	**Serial dilutions, post digestion spikes, and method of standard additions**					
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?	X				
S10	OI	**Method detection limit (MDL) studies**					
		Was a MDL study performed for each reported analyte?	X				
		Is the MDL either adjusted or supported by the analysis of DCSs?	X				
S11	OI	**Proficiency test reports:**					
		Was the laboratory's performance acceptable on the applicable proficiency tests or evaluation studies?	X				
S12	OI	**Standards documentation**					
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X				
S13	OI	**Compound/analyte identification procedures**					
		Are the procedures for compound/analyte identification documented?	X				
S14	OI	**Demonstration of analyst competency (DOC)**					
		Was DOC conducted consistent with NELAC Chapter 5C or ISO/IEC 4?	X				
		Is documentation of the analyst's competency up-to-date and on file?	X				
S15	OI	**Verification/validation documentation for methods** (NELAC Chap 5 or ISO/IEC 17025 Section 5)					
		Are all the methods used to generate the data documented, verified, and validated, where applicable?	X				
S16	OI	**Laboratory standard operating procedures (SOPs):**					
		Are laboratory SOPs current and on file for each method performed?	X				

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);
NA = Not Applicable; NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

Laboratory Review Checklist: Exception Reports	
Laboratory Name: ALS Laboratory Group	LRC Date: 04/04/2025
Project Name: NRG CCR PROGRAM APP III	Laboratory Job Number: HS25031217
Reviewer Name: Andy Neir	Prep Batch Number(s): 226061,R509774,R509909,R510369

ER#[5]	**Description**
1	Batch R509909, Anions Method E300, sample MW-37, MS recovered outside the control limit for Sulfate, however, the result in the parent sample is 4x greater than the spike amount.
2	See Run Log and CCB Exceptions Report.

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);
NA = Not Applicable;
NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

FORM 13 - ANALYSIS RUN LOG

Client: TRC
Project: NRG CCR PROGRAM APP III
WorkOrder: HS25031217
Start Date: 31-Mar-2025 End Date: 31-Mar-2025

Run ID:ICPMS06_510006
Instrument:ICPMS06
Method:SW6020A

Sample No.	D/F	Time	FileID	Analytes
ICV	1	31-Mar-2025 11:38	042_ICV.d	B CA
LLICV5	1	31-Mar-2025 11:40	043LCV5.d	B CA
LLICV2	1	31-Mar-2025 11:42	044LCV2.d	B CA
ICB	1	31-Mar-2025 11:44	045_ICB.d	B CA
ICSA	1	31-Mar-2025 11:48	047ICSA.d	B CA
ICSAB	1	31-Mar-2025 11:50	048ICSB.d	B CA
CCV 1	1	31-Mar-2025 11:58	051_CCV.d	B CA
CCB 1	1	31-Mar-2025 12:00	052_CCB.d	B CA
CCV 2	1	31-Mar-2025 12:22	063_CCV.d	B CA
CCB 2	1	31-Mar-2025 12:23	064_CCB.d	B CA
CCV 3	1	31-Mar-2025 12:46	075_CCV.d	B CA
CCB 3	1	31-Mar-2025 12:48	076_CCB.d	B CA
CCV 4	1	31-Mar-2025 13:26	083_CCV.d	B CA
CCB 4	1	31-Mar-2025 13:28	084_CCB.d	B CA
CCV 5	1	31-Mar-2025 13:50	095_CCV.d	B CA
CCB 5	1	31-Mar-2025 13:52	096_CCB.d	B CA
CCB 6	1	31-Mar-2025 14:18	108_CCB.d	B CA
CCV 6	1	31-Mar-2025 14:24	110_CCV.d	B CA
CCV 7	1	31-Mar-2025 14:46	120_CCV.d	B CA
CCB 7	1	31-Mar-2025 14:48	121_CCB.d	B CA
CCB 8	1	31-Mar-2025 15:23	133_CCB.d	B CA
CCV 8	1	31-Mar-2025 15:31	135_CCV.d	B CA
CCB 9	1	31-Mar-2025 15:55	147_CCB.d	B CA
CCV 9	1	31-Mar-2025 15:59	149_CCV.d	B CA
CCV 10	1	31-Mar-2025 16:32	154_CCV.d	B CA
CCB 10	1	31-Mar-2025 16:34	155_CCB.d	B CA
CCV 11	1	31-Mar-2025 17:02	166_CCV.d	B CA
CCB 11	1	31-Mar-2025 17:03	167_CCB.d	B CA
LCS-226061	1	31-Mar-2025 17:10	169SMPL.d	B CA
ZZZZZZSD	5	31-Mar-2025 17:12	170SMPL.d	B CA
ZZZZZZMS	1	31-Mar-2025 17:18	173SMPL.d	B CA
ZZZZZZMSD	1	31-Mar-2025 17:20	174SMPL.d	B CA
ZZZZZZPDS	1	31-Mar-2025 17:22	175SMPL.d	B CA
CCV 12	1	31-Mar-2025 17:28	178_CCV.d	B CA
CCB 12	1	31-Mar-2025 17:30	179_CCB.d	B CA
MW-63	1	31-Mar-2025 17:53	188SMPL.d	B
CCV 13	1	31-Mar-2025 17:59	190_CCV.d	B CA
CCB 13	1	31-Mar-2025 18:01	191_CCB.d	B CA
MW-37	1	31-Mar-2025 18:09	192SMPL.d	B
MW-38R	1	31-Mar-2025 18:11	193SMPL.d	B
CCV 14	1	31-Mar-2025 18:30	202_CCV.d	B CA
CCB 14	1	31-Mar-2025 18:32	203_CCB.d	B CA
MBLK-226061	1	31-Mar-2025 18:35	204SMPL.d	B CA
MW-37	20	31-Mar-2025 18:53	213SMPL.d	CA
CCV 15	1	31-Mar-2025 18:55	214_CCV.d	B CA
CCB 15	1	31-Mar-2025 18:57	215_CCB.d	B CA
MW-23R	20	31-Mar-2025 19:15	224SMPL.d	CA
CCV 16	1	31-Mar-2025 19:19	226_CCV.d	B CA
CCB 16	1	31-Mar-2025 19:21	227_CCB.d	B CA
CCV 17	1	31-Mar-2025 19:44	238_CCV.d	B CA

FORM 13 - ANALYSIS RUN LOG

Client: TRC
Project: NRG CCR PROGRAM APP III
WorkOrder: HS25031217
Start Date: 31-Mar-2025 End Date: 31-Mar-2025

Run ID:ICPMS06_510006
Instrument:ICPMS06
Method:SW6020A

Sample No.	D/F	Time	FileID	Analytes
CCB 17	1	31-Mar-2025 19:46	239_CCB.d	B CA
CCV 18	1	31-Mar-2025 20:04	248_CCV.d	B CA
CCB 18	1	31-Mar-2025 20:06	249_CCB.d	B CA
LLCCV2	1	31-Mar-2025 20:08	250LCV2.d	B CA
LLCCV5	1	31-Mar-2025 20:10	251LCV5.d	B CA
ICSA	1	31-Mar-2025 20:12	252ICSA.d	B CA
ICSAB	1	31-Mar-2025 20:14	253ICSB.d	B CA

CCB EXCEPTIONS REPORT

Client: TRC
Project: NRG CCR PROGRAM APP III
WorkOrder: HS25031217

Run ID:ICPMS06_510006
Instrument:ICPMS06
Method:SW6020A

CCB 16	Date: 31-Mar-2025 19:21	Seq: 8758607	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	21.6	11	20

CCB 17	Date: 31-Mar-2025 19:46	Seq: 8758619	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	37.46	11	20

CCB 18	Date: 31-Mar-2025 20:06	Seq: 8758629	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	38.1	11	20

Client: TRC
Project: NRG CCR PROGRAM APP III
Work Order: HS25031217

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS25031217-01	MW-63	Water		26-Mar-2025 08:25	26-Mar-2025 11:30	☐
HS25031217-02	MW-37	Water		26-Mar-2025 08:25	26-Mar-2025 11:30	☐
HS25031217-03	MW-38R	Water		26-Mar-2025 09:00	26-Mar-2025 11:30	☐
HS25031217-04	MW-23R	Water		26-Mar-2025 09:05	26-Mar-2025 11:30	☐

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG CCR PROGRAM APP III		WorkOrder:HS25031217
Sample ID:	MW-63		Lab ID:HS25031217-01
Collection Date:	26-Mar-2025 08:25		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 29-Mar-2025		Analyst: JC
Boron	**0.842**		**0.0110**	**0.0200**	**mg/L**	1	31-Mar-2025 17:53
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	04-Apr-2025 10:55

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG CCR PROGRAM APP III		WorkOrder:HS25031217
Sample ID:	MW-37		Lab ID:HS25031217-02
Collection Date:	26-Mar-2025 08:25		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 29-Mar-2025		Analyst: JC
Boron	**0.441**		**0.0110**	**0.0200**	**mg/L**	1	31-Mar-2025 18:09
Calcium	**298**		**0.680**	**10.0**	**mg/L**	20	31-Mar-2025 18:53
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Sulfate	**1,280**		**4.00**	**10.0**	**mg/L**	20	28-Mar-2025 11:37
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: MH
Total Dissolved Solids (Residue, Filterable)	**1,790**		**3.00**	**10.0**	**mg/L**	1	27-Mar-2025 10:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG CCR PROGRAM APP III		WorkOrder:HS25031217
Sample ID:	MW-38R		Lab ID:HS25031217-03
Collection Date:	26-Mar-2025 09:00		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 29-Mar-2025		Analyst: JC
Boron	**0.365**		**0.0110**	**0.0200**	**mg/L**	1	31-Mar-2025 18:11
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Sulfate	**675**		**2.00**	**5.00**	**mg/L**	10	28-Mar-2025 11:54

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG CCR PROGRAM APP III		WorkOrder:HS25031217
Sample ID:	MW-23R		Lab ID:HS25031217-04
Collection Date:	26-Mar-2025 09:05		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 29-Mar-2025		Analyst: JC
Calcium	**520**		**0.680**	**10.0**	**mg/L**	20	31-Mar-2025 19:15
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Sulfate	**1,510**		**4.00**	**10.0**	**mg/L**	20	28-Mar-2025 12:00
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: MH
Total Dissolved Solids (Residue, Filterable)	**3,150**		**3.00**	**10.0**	**mg/L**	1	27-Mar-2025 10:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Weight / Prep Log

Client: TRC
Project: NRG CCR PROGRAM APP III
WorkOrder: HS25031217

Batch ID: 226061 **Start Date:** 29 Mar 2025 14:00 **End Date:** 29 Mar 2025 14:00
Method: WATER - SW3010A **Prep Code:** 3010A

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS25031217-01		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25031217-02		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25031217-03		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25031217-04		10 (mL)	10 (mL)	1	120 plastic HNO3

Client: TRC
Project: NRG CCR PROGRAM APP III
WorkOrder: HS25031217

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: 226061 (0)	**Test Name :** ICP-MS METALS BY SW6020A				**Matrix:** Water	
HS25031217-01	MW-63	26 Mar 2025 08:25		29 Mar 2025 14:00	31 Mar 2025 17:53	1
HS25031217-02	MW-37	26 Mar 2025 08:25		29 Mar 2025 14:00	31 Mar 2025 18:53	20
HS25031217-02	MW-37	26 Mar 2025 08:25		29 Mar 2025 14:00	31 Mar 2025 18:09	1
HS25031217-03	MW-38R	26 Mar 2025 09:00		29 Mar 2025 14:00	31 Mar 2025 18:11	1
HS25031217-04	MW-23R	26 Mar 2025 09:05		29 Mar 2025 14:00	31 Mar 2025 19:15	20
Batch ID: R509774 (0)	**Test Name :** TOTAL DISSOLVED SOLIDS BY SM2540C				**Matrix:** Water	
HS25031217-02	MW-37	26 Mar 2025 08:25			27 Mar 2025 10:30	1
HS25031217-04	MW-23R	26 Mar 2025 09:05			27 Mar 2025 10:30	1
Batch ID: R509909 (0)	**Test Name :** ANIONS BY E300.0, REV 2.1, 1993				**Matrix:** Water	
HS25031217-02	MW-37	26 Mar 2025 08:25			28 Mar 2025 11:37	20
HS25031217-03	MW-38R	26 Mar 2025 09:00			28 Mar 2025 11:54	10
HS25031217-04	MW-23R	26 Mar 2025 09:05			28 Mar 2025 12:00	20
Batch ID: R510369 (0)	**Test Name :** SUBCONTRACT ANALYSIS - FLOURIDE				**Matrix:** Water	
HS25031217-01	MW-63	26 Mar 2025 08:25			04 Apr 2025 10:55	1

WorkOrder:	HS25031217
InstrumentID:	ICPMS06
Test Code:	ICP_TW
Test Number:	SW6020A
Test Name:	ICP-MS Metals by SW6020A

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Boron	7440-42-8	0.0125	0.00692	0.0110	0.0200
A	Calcium	7440-70-2	0.100	0.109	0.0340	0.500

WorkOrder:	HS25031217
InstrumentID:	Subcontract
Test Code:	Sub_Flouride
Test Number:	NA
Test Name:	Subcontract Analysis - Flouride

METHOD DETECTION / REPORTING LIMITS

Matrix:

Units:

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Subcontract Analysis		0	0	0	0

WorkOrder:	HS25031217
InstrumentID:	ICS-Integrion
Test Code:	300_W
Test Number:	E300
Test Name:	Anions by E300.0, Rev 2.1, 1993

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Sulfate	14808-79-8	0.250	0.324	0.200	0.500

WorkOrder: HS25031217
InstrumentID: Balance1
Test Code: TDS_W 2540C
Test Number: M2540C
Test Name: Total Dissolved Solids by SM2540C

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Total Dissolved Solids (Residue, Filterable)	TDS	5.00	1.60	3.00	10.0

Client: TRC
Project: NRG CCR PROGRAM APP III
WorkOrder: HS25031217

QC BATCH REPORT

Batch ID: 226061 (0) **Instrument:** ICPMS06 **Method:** ICP-MS METALS BY SW6020A

MBLK Sample ID: **MBLK-226061** Units: **mg/L** Analysis Date: **31-Mar-2025 18:35**
Client ID: Run ID: **ICPMS06_510006** SeqNo: **8758634** PrepDate: **29-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	< 0.0110	0.0200								
Calcium	< 0.0340	0.500								

LCS Sample ID: **LCS-226061** Units: **mg/L** Analysis Date: **31-Mar-2025 17:10**
Client ID: Run ID: **ICPMS06_510006** SeqNo: **8758326** PrepDate: **29-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.4691	0.0200	0.5	0	93.8	80 - 120				
Calcium	5.834	0.500	5	0	117	80 - 120				

MS Sample ID: **HS25031207-02MS** Units: **mg/L** Analysis Date: **31-Mar-2025 17:18**
Client ID: Run ID: **ICPMS06_510006** SeqNo: **8758330** PrepDate: **29-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.4905	0.0200	0.5	0.0228	93.5	80 - 120				
Calcium	48.07	0.500	5	43.59	89.6	80 - 120				O

MSD Sample ID: **HS25031207-02MSD** Units: **mg/L** Analysis Date: **31-Mar-2025 17:20**
Client ID: Run ID: **ICPMS06_510006** SeqNo: **8758331** PrepDate: **29-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.4902	0.0200	0.5	0.0228	93.5	80 - 120	0.4905	0.0569	20	
Calcium	47.78	0.500	5	43.59	83.7	80 - 120	48.07	0.622	20	O

PDS Sample ID: **HS25031207-02PDS** Units: **mg/L** Analysis Date: **31-Mar-2025 17:22**
Client ID: Run ID: **ICPMS06_510006** SeqNo: **8758332** PrepDate: **29-Mar-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.501	0.0200	0.5	0.0228	95.6	75 - 125				
Calcium	52.26	0.500	10	43.59	86.7	75 - 125				O

Client: TRC
Project: NRG CCR PROGRAM APP III
WorkOrder: HS25031217

QC BATCH REPORT

Batch ID: **226061 (0)** **Instrument:** **ICPMS06** **Method:** **ICP-MS METALS BY SW6020A**

SD Sample ID: **HS25031207-02SD** Units: **mg/L** Analysis Date: **31-Mar-2025 17:12**
Client ID: Run ID: **ICPMS06_510006** SeqNo: **8758327** PrepDate: **29-Mar-2025** DF: **5**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Boron	< 0.0550	0.100					0.0228	0	10	
Calcium	42.58	2.50					43.59	2.31	10	

The following samples were analyzed in this batch: HS25031217-01 HS25031217-02 HS25031217-03 HS25031217-04

Client: TRC
Project: NRG CCR PROGRAM APP III
WorkOrder: HS25031217

QC BATCH REPORT

Batch ID: R509774 (0) **Instrument:** Balance1 **Method:** TOTAL DISSOLVED SOLIDS BY SM2540C

MBLK Sample ID: **WMBLK-03272025** Units: **mg/L** Analysis Date: **27-Mar-2025 10:30**
Client ID: Run ID: **Balance1_509774** SeqNo: **8750552** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	< 3.00	10.0								

LCS Sample ID: **WLCS-03272025** Units: **mg/L** Analysis Date: **27-Mar-2025 10:30**
Client ID: Run ID: **Balance1_509774** SeqNo: **8750551** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	974	10.0	1000	0	97.4	85 - 115				

DUP Sample ID: **HS25031217-04 DUP** Units: **mg/L** Analysis Date: **27-Mar-2025 10:30**
Client ID: **MW-23R** Run ID: **Balance1_509774** SeqNo: **8750550** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	3250	10.0					3150	3.12	20	

DUP Sample ID: **HS25031208-01 DUP** Units: **mg/L** Analysis Date: **27-Mar-2025 10:30**
Client ID: Run ID: **Balance1_509774** SeqNo: **8750542** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	2360	10.0					2460	4.15	20	

The following samples were analyzed in this batch: HS25031217-02 HS25031217-04

Client: TRC
Project: NRG CCR PROGRAM APP III
WorkOrder: HS25031217

QC BATCH REPORT

Batch ID: R509909 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY E300.0, REV 2.1, 1993

MBLK Sample ID: **MBLK** Units: **mg/L** Analysis Date: **28-Mar-2025 10:56**
Client ID: Run ID: **ICS-Integrion_509909** SeqNo: **8754298** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	< 0.200	0.500								

LCS Sample ID: **LCS** Units: **mg/L** Analysis Date: **28-Mar-2025 11:13**
Client ID: Run ID: **ICS-Integrion_509909** SeqNo: **8754299** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	19.33	0.500	20	0	96.7	90 - 110				

MS Sample ID: **HS25031280-01MS** Units: **mg/L** Analysis Date: **28-Mar-2025 12:35**
Client ID: Run ID: **ICS-Integrion_509909** SeqNo: **8754311** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	50.76	0.500	10	42.34	84.2	80 - 120				O

MS Sample ID: **HS25031217-02MS** Units: **mg/L** Analysis Date: **28-Mar-2025 11:43**
Client ID: **MW-37** Run ID: **ICS-Integrion_509909** SeqNo: **8754304** PrepDate: DF: **20**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	1411	10.0	200	1276	67.4	80 - 120				SO

MSD Sample ID: **HS25031280-01MSD** Units: **mg/L** Analysis Date: **28-Mar-2025 12:41**
Client ID: Run ID: **ICS-Integrion_509909** SeqNo: **8754312** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	51.07	0.500	10	42.34	87.4	80 - 120	50.76	0.622	20	O

MSD Sample ID: **HS25031217-02MSD** Units: **mg/L** Analysis Date: **28-Mar-2025 11:48**
Client ID: **MW-37** Run ID: **ICS-Integrion_509909** SeqNo: **8754305** PrepDate: DF: **20**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	1406	10.0	200	1276	64.9	80 - 120	1411	0.359	20	SO

The following samples were analyzed in this batch: HS25031217-02 HS25031217-03 HS25031217-04

Client:	TRC	**QUALIFIERS, ACRONYMS, UNITS**
Project:	NRG CCR PROGRAM APP III	
WorkOrder:	**HS25031217**	

Qualifier	Description
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte detected below quantitation limit
M	Manually integrated, see raw data for justification
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL/SDL

Acronym	Description
DCS	Detectability Check Study
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitaion Limit
SD	Serial Dilution
SDL	Sample Detection Limit
TRRP	Texas Risk Reduction Program

CERTIFICATIONS,ACCREDITATIONS & LICENSES

Agency	Number	Expire Date
Arizona	AZ0793	27-May-2025
California	2919; 2025	30-Apr-2025
Dept of Defense	L24-239	30-Apr-2026
Dept of Defense	L24-240	30-Apr-2026
Florida	E87611-38	30-Jun-2025
Illinois	2000322023-11	31-Jul-2025
Kansas	E-10352 2023-2024	31-Jul-2025
Kentucky	123043	30-Apr-2025
Louisiana	03087 2023-2024	30-Jun-2025
Maine	2024017	23-Jun-2026
Michigan	9971	30-Apr-2025
Nebraska	NE-OS-25-13	30-Apr-2025
New Jersey	TX008	30-Jun-2025
Pennsylvania	018	30-Jun-2025
Tennessee	04016	30-Apr-2025
Texas	T104704231 TX-C24-00130	30-Apr-2025
Utah	TX026932023-14	31-Jul-2025

Sample Receipt Checklist

Work Order ID:	HS25031217	**Date/Time Received:**	**26-Mar-2025 11:30**
Client Name:	TRC-HOU	**Received by:**	**Michael Lucio**

Completed By:	*eSignature*	*Date/Time*	**Reviewed by:**	*eSignature*	*Date/Time*
	/S/ Ruben Estrada-Jr	26-Mar-2025 21:00			

Matrices: **WATER** Carrier name: **Client**

	Yes	No	
Shipping container/cooler in good condition?	☑	☐	Not Present ☐
Custody seals intact on shipping container/cooler?	☐	☐	Not Present ☑
Custody seals intact on sample bottles?	☐	☐	Not Present ☑
VOA/TX1005/TX1006 Solids in hermetically sealed vials?	☐	☐	Not Present ☑
Chain of custody present?	☑	☐	1 Page(s)
Chain of custody signed when relinquished and received?	☑	☐	COC IDs:338638
Samplers name present on COC?	☑	☐	
Chain of custody agrees with sample labels?	☑	☐	
Samples in proper container/bottle?	☑	☐	
Sample containers intact?	☑	☐	
Sufficient sample volume for indicated test?	☑	☐	
All samples received within holding time?	☑	☐	
Container/Temp Blank temperature in compliance?	☑	☐	

Temperature(s)/Thermometer(s):	4.1UC/4.1C	IR36
Cooler(s)/Kit(s):	53164	
Date/Time sample(s) sent to storage:	3/26/25 21:55	

	Yes	No	
Water - VOA vials have zero headspace?	☐	☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	☑	☐	N/A ☐
pH adjusted?	☐	☐	N/A ☑

pH adjusted by:

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

Corrective Action:

Cincinnati, OH +1 513 733 5336
Everett, WA +1 425 356 2600
Fort Collins, CO +1 970 490 1511
Holland, MI +1 616 399 6070

Chain of Custody Form

Page 1 of 1

COC ID: 338638

HS25031217

WV

TRC

NRG CCR PROGRAM APP III

ALS Project Manager:

Customer Information		Project Information			
Purchase Order		Project Name		A	
Work Order		Project Number		B	
Company Name		Bill To Company		C	
Send Report To		Invoice Attn		D	
Address		Address		E	
				F	
City/State/Zip		City/State/Zip		G	
Phone		Phone		H	
Fax		Fax		I	
e-Mail Address		e-Mail Address		J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1		3-26-25	825														
2		↓	825														
3			900														
4	~~ ~~													no access - CSS			
5		3-26-25	905														
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign: Cody Springer & NMI Team

Shipment Method: Drop off @ lab

Required Turnaround Time: (Check Box)

Results Due Date:

Relinquished by: Jacob Dunlap	Date: 3-26-25	Time: 1130	Received by:	Notes:	
Relinquished by:	Date: 3-26-25	Time: 11:30	Received by (Laboratory): ML	Cooler ID: 53164	Cooler Temp.: 4.1
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory):	QC Package: (Check One Box Below)	

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

IR36

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited to the terms and conditions stated on the reverse.
3. The Chain of Custody is a legal document. All information must be completed accurately.

ALS	ALS 10450 Stancliff Rd., Suite 210 Houston, Texas 77099 Tel. +1 281 530 5656 Fax. +1 281 530 5887	**CUSTODY SEAL** Date: 3-26-25 Time: Name: Company:	Seal Broken By: Date:

Privileged and Confidential

04-Apr-2025

Andrew Neir
ALS Environmental
10450 Stancliff Rd
Suite 210
Houston, TX 77099

Re: **HS25031217** Work Order: **25040029**

Dear Andrew,

ALS Environmental received 1 sample on 02-Apr-2025 10:00 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental - Holland and for only the analyses requested.

Sample results are compliant with industry accepted practices and Quality Control results achieved laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 13.

If you have any questions regarding this report, please feel free to contact me:

ADDRESS: 3352 128th Avenue, Holland, MI, USA
PHONE: +1 (616) 399-6070 FAX: +1 (616) 399-6185

Sincerely,

Chelsey Cook

Electronically approved by: Chelsey Cook

Chelsey Cook
Project Manager

ALS Group, USA

Date: *04-Apr-25*

Client: ALS Environmental
Project: HS25031217
Work Order: 25040029

TRRP Laboratory Data Package Cover Page

This data package consists of all or some of the following as applicable:

This signature page, the laboratory case narrative, and the following reportable data:

R1 Field chain-of-custody documentation:
R2 Sample identification cross-reference
R3 Test reports (analytical data sheets) for each environmental sample that includes:
- a) Items consistent with NELAC Chapter 5
- b) dilution factors,
- c) preparation methods,
- d) cleanup methods, and
- e) if required for the project, tentatively identified compounds (TICs).

R4 Surrogate recovery data including:
- a) Calculated recovery (%R), and
- b) The laboratory's surrogate QC limits.

R5 Test reports/summary forms for blank samples;
R6 Test reports/summary forms for laboratory control samples (LCSs) including:
- a) LCS spiking amounts,
- b) Calculated %R for each analyte, and
- c) The laboratory's LCS QC limits.

R7 Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
- a) Samples associated with the MS/MSD clearly identified,
- b) MS/MSD spiking amounts,
- c) Concentration of each MS/MSD analyte measured in the parent and spiked samples,
- d) Calculated %Rs and relative percent differences (RPDs), and
- e) The laboratory's MS/MSD QC limits

R8 Laboratory analytical duplicate (if applicable) recovery and precision:
- a) the amount of analyte measured in the duplicate,
- b) the calculated RPD, and
- c) the laboratory's QC limits for analytical duplicates.

R9 List of method quantitation limits (MQLs) for each analyte for each method and matrix;
R10 Other problems or anomalies:
See Case Narrative.

Release Statement: I am responsible for the release of this laboratory data package. This data package has been reviewed by the laboratory and is complete and technically compliant with the requirements of the methods used, except where noted by the laboratory in the attached Case Narrative and QC Summaries. By my signature below, I affirm to the best of my knowledge, all problems/anomalies, observed by the laboratory as having the potential to affect the quality of the data, have been identified, and no information affecting the quality of the data has been knowingly withheld.

Chelsey Cook

Chelsey Cook
Project Manager

WET CHEMISTRY DATA ASSESSMENT CHECKLIST

Wet Chemistry		Batch Number: TITRATOR1_250402A		Instrument ID: TITRATOR1				
Method: FL_4500C_W		Work order Number (s): 25040029						
Analyst Name: KB		Date: 04-02/25	Reviewer Name: RM		Date: 4/3/25			

	A[1]	Description	Yes	No	NA[2]	NR[3]	ER#[4]
R1	I	Chain-of-Custody					
		1) Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?			X		
		2) Were all departures from standard conditions described in an exception report?			X		
R2	I	**SAMPLE AND QUALITY CONTROL (QC) IDENTIFICATION**					
		1) Are all field sample ID numbers cross-referenced to the laboratory ID numbers?			X		
		2) Are all laboratory ID numbers cross-referenced to the corresponding QC data?			X		
R3	I	**TEST REPORTS**					
		1) Were all samples prepared and analyzed within holding times?	X				
		2) Other than those results < MQL, were all other raw values bracketed by calibration standards?	X				
		3) Were calculations checked by a peer or supervisor?	X				
		4) Were all analyte identifications checked by a peer or supervisor?	X				
		5) Were sample quantitation limits reported for all analytes not detected?	X				
		6) Were all results for soil and sediment samples reported on a dry weight basis?			X		
		7) Was % moisture (or solids) reported for all soil and sediment samples?			X		
		8) If required for the project, TICs reported?			X		
R4	I	**SURROGATE RECOVERY DATA**					
		1) Were surrogates added prior to extraction?			X		
		2) Were surrogate percent recoveries in all samples within the laboratory QC limits?			X		
R5	I	**TEST REPORTS/SUMMMARY FORMS FOR BLANK SAMPLES**					
		1) Were appropriate type(s) of blanks analyzed?	X				
		2) Were blanks analyzed at the appropriate frequency?	X				
		3) Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X				
		4) Were blank concentrations < ½ MQL?	X				
R6	I	**LABORATORY CONTROL SAMPLES (LCS):**					
		1) Were all COCs included in the LCS?	X				
		2) Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X				
		3) Were LCSs analyzed at the required frequency?	X				
		4) Were LCS and LCSD %Rs within the laboratory QC limits?	X				
		5) Does the detectability data document the laboratory's capability to detect the COCs at the MDL used to calculate the SQLs?	X				
		6) Was the LCSD RPD within QC limits?	X				
R7	I	**MATRIX SPIKE (MS) AND MATRIX SPIKE DUPLICATE (MSD) DATA**					
		1) Were the project or method specified analytes included in the MS and MSD?	X				
		2) Were MS/MSD analyzed at the appropriate frequency?	X				
		3) Were MS and MSD %Rs within the laboratory QC limits?	X				
		4) Were MS/MSD RPDs within laboratory QC limits?	X				
R8	I	**ANALYTICAL DUPLICATE DATA (IF REQUIRED)**					
		1) Were appropriate analytical duplicates analyzed for each matrix?	X				
		2) Were analytical duplicates analyzed at the appropriate frequency?	X				
		3) Were RPDs or relative standard deviations within the laboratory QC limits?	X				
R9	I	**METHOD QUANTITATION LIMITS (MQLS):**					
		1) Are the MQLs for each method analyte listed and included in the laboratory data package?	X				
		2) Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X				
		3) Are unadjusted MQLs included in the laboratory data package?			X		
R10	I	**OTHER PROBLEMS/ANOMALIES**					
		1) Are all known problems/anomalies/special conditions noted in this LRC and ER?	X				
		2) Were all necessary corrective actions performed for the reported data?	X				
		3) If requested, is the justification for elevated SQLs documented?			X		

S1	I	**INITIAL CALIBRATION (ICAL)**					
		1) Were response factors (RFs) and/or relative response factors (RRFs) for each analyte within the QC limits?			X		
		2) Were percent RSDs or correlation coefficient criteria met?	X				
		3) Was the number of standards recommended in the method used for all analytes?	X				
		4) Were all points generated between the lowest and highest standard used to calculate the curve?	X				
		5) Are ICAL data available for all instruments used?	X				
		6) Has the initial calibration curve been verified using an appropriate second source standard?	X				
S2	I	**INITIAL AND CONTINUING CALIBRATION VERIFICATION (ICCV AND CCV) AND**					
		1) Was the CCV analyzed at the method-required frequency?	X				
		2) Were percent differences for each analyte within the method-required QC limits?	X				
		3) Was the ICAL curve verified for each analyte?	X				
		4) Was the absolute value of the analyte concentration in the organic CCB < MDL?	X				
S3	I	**MASS SPECTRAL TUNING:**					
		1) Was the appropriate compound for the method used for tuning?			X		
		2) Were ion abundance data within the method-required QC limits?			X		
S4	I	**INTERNAL STANDARDS (IS):**					
		Were IS area counts within the method-required QC limits?			X		
S5	I	**RAW DATA**					
		1) Were the raw data (e.g., chromatograms, spectral data) reviewed by an analyst?	X				
		2) Were data associated with manual integrations flagged on the raw data?	X				
S6	I	**DUAL COLUMN CONFIRMATION (IF REQUIRED)**					
		Did dual column confirmation results meet the method-required QC?			X		
S7	I	**TENTATIVELY IDENTIFIED COMPOUNDS (TICS):**					
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X		
S8	I	**INTERFERENCE CHECK SAMPLE (ICS) RESULTS:**					
		Were percent recoveries within method QC limits?			X		
S9	I	**SERIAL DILUTIONS, POST DIGESTION SPIKES, AND METHOD OF STANDARD**					
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?			X		
S10	I	**PROFICIENCY TEST REPORTS:**					
		Are proficiency testing or inter-laboratory comparison results on file?	X				
S11	I	**METHOD DETECTION LIMIT (MDL) STUDIES**					
		1) Was a MDL study performed for each reported analyte?	X				
		2) Is the MDL either adjusted or supported by the analysis of DCSs?	X				
S12	I	**STANDARDS DOCUMENTATION**					
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X				
S13	I	**COMPOUND/ANALYTE IDENTIFICATION PROCEDURES**					
		Are the procedures for compound/analyte identification documented?	X				
S14	I	**DEMONSTRATION OF ANALYST COMPETENCY (DOC)**					
		1) Was DOC conducted consistent with NELAC 5C or ISO/IEC 4.2.2?	X				
		2) Is documentation of the analyst's competency up-to-date and on file?	X				
S15	I	**VERIFICATION/VALIDATION DOCUMENTATION FOR METHODS**					
		Are all the methods used to generate the data documented, verified, and validated, where applicable, (NELAC 5.10.2 or ISO/IEC 17025 Section 5.4.5)?	X				
S16	I	**LABORATORY STANDARD OPERATING PROCEDURES (SOPS):**					
		Are laboratory SOPs current and on file for each method performed?	X				

1 O = organic analyses; I = inorganic analyses (and general chemistry, when applicable).
2 NA = Not applicable.
3 NR = Not Reviewed.
4 ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

WET CHEMISTRY DATA ASSESSMENT CHECKLIST		
Wet Chemistry	Batch Number:	

ER #[1]	DESCRIPTION
1	
2	
3	
4	
5	
6	

1 ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked on the LRC)

Client: ALS Environmental
Project: HS25031217
Work Order: **25040029**

Work Order Sample Summary

Lab Samp ID	Client Sample ID	Matrix	Tag Number	Collection Date	Date Received	Hold
25040029-01	MW-63	Water	HS25031217-01	3/26/2025 08:25	4/2/2025 10:00	☐

Client: ALS Environmental
Project: HS25031217
WorkOrder: **25040029**

QUALIFIERS, ACRONYMS, UNITS

Qualifier	Description
*	Value exceeds Regulatory Limit
**	Estimated Value
a	Analyte is non-accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
Hr	BOD/CBOD - Sample was reset outside Hold Time, value should be considered estimated.
J	Analyte is present at an estimated concentration between the MDL and Report Limit
n	Analyte accreditation is not offered
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL
X	Analyte was detected in the Method Blank between the MDL and Reporting Limit, sample results may exhibit background or reagent contamination at the observed level.

Acronym	Description
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
LOD	Limit of Detection (see MDL)
LOQ	Limit of Quantitation (see PQL)
MBLK	Method Blank
MDL	Method Detection Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PQL	Practical Quantitation Limit
RPD	Relative Percent Difference
TDL	Target Detection Limit
TNTC	Too Numerous To Count
A	APHA Standard Methods
D	ASTM
E	EPA
SW	SW-846 Update III

Units Reported	Description
mg/L	Milligrams per Liter

Client:	ALS Environmental
Project:	HS25031217
Work Order:	25040029

Case Narrative

Samples for the above noted Work Order were received on 04/02/2025. The attached "Sample Receipt Checklist" documents the status of custody seals, container integrity, preservation, and temperature compliance.

Samples were analyzed according to the analytical methodology previously transmitted in the "Work Order Acknowledgement". Methodologies are also documented in the "Analytical Result" section for each sample. Quality control results are listed in the "QC Report" section. Sample association for the reported quality control is located at the end of each batch summary. If applicable, results are appropriately qualified in the Analytical Result and QC Report sections. The "Qualifiers" section documents the various qualifiers, units, and acronyms utilized in reporting. A copy of the laboratory's scope of accreditation is available upon request.

With the following exceptions, all sample analyses achieved analytical criteria.

Wet Chemistry:
No deviations or anomalies were noted.

ALS Group, USA

Date: 04-Apr-25

WorkOrder: 25040029
InstrumentID: Titrator 1
Test Code: FL_4500C_W
Test Number: A4500-F C-11
Test Name: Fluoride

METHOD DETECTION / REPORTING LIMITS

Matrix: Water **Units:** mg/L

Type	Analyte	CAS	DCS	MDL	PQL
A	Fluoride	16984-48-8	0	0.058	0.10

ALS Group, USA

Date: *04-Apr-25*

Client:	ALS Environmental		
Project:	HS25031217	**Work Order:**	25040029
Sample ID:	MW-63	**Lab ID:**	25040029-01
Collection Date:	3/26/2025 08:25 AM	**Matrix:**	WATER

Analyses	Result	Qual	MDL	Report Limit	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **KLB**
Fluoride	**0.860**		**0.058**	**0.10**	**mg/L**	1	4/2/2025 16:45

Note: See Qualifiers page for a list of qualifiers and their definitions.

Work Order:	25040029
Client:	ALS Environmental
Project:	HS25031217

DATES REPORT

Sample ID	Client Sample ID	Matrix	Collection Date	TCLP Date	Prep Date	Analysis Date
Batch ID R419282	**Test Name:** Fluoride					
25040029-01 ^	MW-63	Water	3/26/2025 8:25:00 AM			4/2/2025 04:45 PM

ALS Group, USA

Date: 04-Apr-25

Client: ALS Environmental
Work Order: 25040029
Project: HS25031217

QC BATCH REPORT

Batch ID: **R419282** Instrument ID **Titrator 1** Method: **A4500-F C-11**

MBLK Sample ID: **MB-R419282-R419282** Units: **mg/L** Analysis Date: **4/2/2025 04:45 PM**

Client ID: Run ID: **TITRATOR 1_250402A** SeqNo: **11438236** Prep Date: DF: **1**

Analyte	Result	MDL	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	U	0.058	0.10								

LCS Sample ID: **LCS-R419282-R419282** Units: **mg/L** Analysis Date: **4/2/2025 04:45 PM**

Client ID: Run ID: **TITRATOR 1_250402A** SeqNo: **11438237** Prep Date: DF: **1**

Analyte	Result	MDL	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	4.86	0.058	0.10	5	0	97.2	90-111	0			

MS Sample ID: **25040029-01A MS** Units: **mg/L** Analysis Date: **4/2/2025 04:45 PM**

Client ID: **MW-63** Run ID: **TITRATOR 1_250402A** SeqNo: **11438239** Prep Date: DF: **1**

Analyte	Result	MDL	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.7	0.058	0.10	5	0.86	96.8	90-111	0			

MSD Sample ID: **25040029-01A MSD** Units: **mg/L** Analysis Date: **4/2/2025 04:45 PM**

Client ID: **MW-63** Run ID: **TITRATOR 1_250402A** SeqNo: **11438240** Prep Date: DF: **1**

Analyte	Result	MDL	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.88	0.058	0.10	5	0.86	100	90-111	5.7	3.11	20	

The following samples were analyzed in this batch: 25040029-01A

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

10450 Stancliff Rd, Ste 210
Houston, TX 77099
T: +1 281 530 5656
F: +1 281 530 5887
www.alsglobal.com

Subcontract Chain of Custody

SAMPLING STATE: **Texas** **COC ID: 28374**

SUBCONTRACT TO:

ALS Group USA, Corp.
3352 - 128th Ave
Holland, MI 494249263 **Phone:** +1 616 399 6070

CUSTOMER INFORMATION:

Company: ALS Houston
Contact: Andy C. Neir
Address: 10450 Stancliff Rd, Ste 210
Phone: +1 281 530 5656
Email: Andrew.Neir@ALSGlobal.com
Alternate Contact: Jumoke M. Lawal
Email: jumoke.lawal@alsglobal.com

INVOICE INFORMATION:

Company: ALS Houston
Contact: Accounts Payable
Address: 10450 Stancliff Rd, Ste 210
Phone: +1 281 530 5656
Reference: HS25031217
TSR: Ron Martino

	LAB SAMPLE ID / ANALYSIS REQUESTED	CLIENT SAMPLE ID	MATRIX	COLLECT DATE / DUE DATE
1.	**HS25031217-01**	**MW-63**	**Water**	**26 Mar 2025 08:25**
	Fluoride by ISE 4500. Equis EDD			02 Apr 2025

Comments: Please analyze for the analysis listed above.
Send report to the emails shown above.

QC Level: TRRP LRC (TRRP checklist only+Level II (normal))

Relinquished By: ______________ Date/Time: ______________

Received By: ______________ Date/Time: ______________

Cooler ID(s): ______________ Temperature(s): ______________

ALS Group, USA
Holland, Michigan

Sample Receipt Checklist

Client Name:	**ALS - HOUSTON**	Date/Time Received:	**02-Apr-25 10:00**
Work Order:	**25040029**	Received by:	**CMK**

	eSignature	Date		eSignature	Date
Checklist completed by	Caleb Koetje	02-Apr-25	Reviewed by:	Chelsey Cook	03-Apr-25

Matrices: Water
Carrier name: FedEx

	Yes	No	Not Present
Shipping container/cooler in good condition?	☑	☐	☐
Custody seals intact on shipping container/cooler?	☑	☐	☐
Custody seals intact on sample bottles?	☐	☐	☑
Chain of custody present?	☑	☐	
Chain of custody signed when relinquished and received?	☑	☐	
Chain of custody agrees with sample labels?	☑	☐	
Samples in proper container/bottle?	☑	☐	
Sample containers intact?	☑	☐	
Sufficient sample volume for indicated test?	☑	☐	
All samples received within holding time?	☑	☐	
Container/Temp Blank temperature in compliance?	☑	☐	
Sample(s) received on ice?	☑	☐	

Temperature(s)/Thermometer(s): 4.0c IR7
Cooler(s)/Kit(s):
Date/Time sample(s) sent to storage: 4/2/2025 1:30:28 PM

	Yes	No	
Water - VOA vials have zero headspace?	☐	☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	☐	☐	N/A ☑
pH adjusted?	☐	☐	N/A ☑

pH adjusted by: -

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

CorrectiveAction:

Privileged and Confidential

SRC Page 1 of 1

10450 Stancliff Rd. Suite 210
Houston, TX 77099
T: +1 281 530 5656
F: +1 281 530 5887

May 06, 2025

Lori Burris
TRC
11767 Katy Freeway
Suite 850
Houston, TX 77079

Work Order: **HS25041618**

Laboratory Results for: **NRG WA Parish CCR Resample**

Dear Lori Burris,

ALS Environmental received 1 sample(s) on Apr 30, 2025 for the analysis presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Generated By: JUMOKE.LAWAL

Andy C. Neir

Client: TRC
Project: NRG WA Parish CCR Resample
WorkOrder: **HS25041618**

TRRP Laboratory Data Package Cover Page

This data package consists of all or some of the following as applicable:

This signature page, the laboratory review checklist, and the following reportable data:

R1 Field chain-of-custody documentation;

R2 Sample identification cross-reference;

R3 Test reports (analytical data sheets) for each environmental sample that includes:
a) Items consistent with NELAC Chapter 5,
b) dilution factors,
c) preparation methods,
d) cleanup methods, and
e) if required for the project, tentatively identified compounds (TICs).

R4 Surrogate recovery data including:
a) Calculated recovery (%R), and
b) The laboratory's surrogate QC limits.

R5 Test reports/summary forms for blank samples;

R6 Test reports/summary forms for laboratory control samples (LCSs) including:
a) LCS spiking amounts,
b) Calculated %R for each analyte, and
c)The laboratory's LCS QC limits.

R7 Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
a) Samples associated with the MS/MSD clearly identified,
b) MS/MSD spiking amounts,
c) Concentration of each MS/MSD analyte measured in the parent and spiked samples,
d) Calculated %Rs and relative percent differences (RPDs), and
e) The laboratory's MS/MSD QC limits.

R8 Laboratory analytical duplicate (if applicable) recovery and precision:
a) the amount of analyte measured in the duplicate,
b) the calculated RPD, and
c) the laboratory's QC limits for analytical duplicates.

R9 List of method quantitation limits (MQLs) and detectability check sample results for each analyte for each method and matrix.

R10 Other problems or anomalies.
The Exception Report for each "No" or "Not Reviewed (NR)" item in Laboratory Review Checklist and for each analyte, matrix, and method for which the laboratory does not hold NELAC accreditation under the Texas Laboratory Accreditation Program.

Client:	TRC	**TRRP Laboratory Data Package Cover Page**
Project:	NRG WA Parish CCR Resample	
WorkOrder:	**HS25041618**	

Release Statement: I am responsible for the release of this laboratory data package. This laboratory is NELAC accredited under the Texas Laboratory Accreditation Program for all the methods, analytes and matrices reported in this data package except as noted in the Exception Reports. The data have been reviewed and are technically compliant with the requirements of the methods used, except where noted by the laboratory in the attached exception reports. By my signature below, I affirm to the best of my knowledge, all problems/anomalies, observed by the laboratory have been identified by the laboratory in the Laboratory Review Checklist, and no information affecting the quality of the data has been knowingly withheld.

Check, if applicable: [NA] This laboratory meets an exception under 30 TAC §25.6 and was last inspected by [ ] TCEQ or [ ] _______________ on (enter date of last inspection). Any findings affecting the data in this laboratory data package are noted in the Exception Reports herein. The official signing the cover page of the report in which these data are used is responsible for releasing this data package and is by signature affirming the above release statement is true.

Andy C. Neir

Laboratory Review Checklist: Reportable Data

Laboratory Name: ALS Laboratory Group	LRC Date: 05/06/2025
Project Name: NRG WA Parish CCR Resample	Laboratory Job Number: HS25041618
Reviewer Name: Andy Neir	Prep Batch Number(s): R512409,R512513

#[1]	A[2]	Description	Yes	No	NA[3]	NR[4]	ER#[5]
R1	OI	**Chain-of-custody (C-O-C)**					
		Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?	X				
		Were all departures from standard conditions described in an exception report?	X				
R2	OI	**Sample and quality control (QC) identification**					
		Are all field sample ID numbers cross-referenced to the laboratory ID numbers?	X				
		Are all laboratory ID numbers cross-referenced to the corresponding QC data?	X				
R3	OI	**Test reports**					
		Were all samples prepared and analyzed within holding times?	X				
		Other than those results < MQL, were all other raw values bracketed by calibration standards?	X				
		Were calculations checked by a peer or supervisor?	X				
		Were all analyte identifications checked by a peer or supervisor?	X				
		Were sample detection limits reported for all analytes not detected?	X				
		Were all results for soil and sediment samples reported on a dry weight basis?			X		
		Were % moisture (or solids) reported for all soil and sediment samples?			X		
		Were bulk soils/solids samples for volatile analysis extracted with methanol per SW-846 Method 5035?			X		
		If required for the project, TICs reported?			X		
R4	O	**Surrogate recovery data**					
		Were surrogates added prior to extraction?			X		
		Were surrogate percent recoveries in all samples within the laboratory QC limits?			X		
R5	OI	**Test reports/summary forms for blank samples**					
		Were appropriate type(s) of blanks analyzed?	X				
		Were blanks analyzed at the appropriate frequency?	X				
		Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X				
		Were blank concentrations < MQL?	X				
R6	OI	**Laboratory control samples (LCS):**					
		Were all COCs included in the LCS?	X				
		Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X				
		Were LCSs analyzed at the required frequency?	X				
		Were LCS (and LCSD, if applicable) %Rs within the laboratory QC limits?	X				
		Does the detectability data document the laboratory's capability to detect the COCs at the MDL used to calculate the SDLs?	X				
		Was the LCSD RPD within QC limits?	X				
R7	OI	**Matrix spike (MS) and matrix spike duplicate (MSD) data**					
		Were the project/method specified analytes included in the MS and MSD?	X				
		Were MS/MSD analyzed at the appropriate frequency?	X				
		Were MS (and MSD, if applicable) %Rs within the laboratory QC limits?	X				
		Were MS/MSD RPDs within laboratory QC limits?	X				
R8	OI	**Analytical duplicate data**					
		Were appropriate analytical duplicates analyzed for each matrix?	X				
		Were analytical duplicates analyzed at the appropriate frequency?	X				
		Were RPDs or relative standard deviations within the laboratory QC limits?	X				
R9	OI	**Method quantitation limits (MQLs):**					
		Are the MQLs for each method analyte included in the laboratory data package?	X				
		Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X				
		Are unadjusted MQLs and DCSs included in the laboratory data package?	X				
R10	OI	**Other problems/anomalies**					
		Are all known problems/anomalies/special conditions noted in this LRC and ER?	X				
		Were all necessary corrective actions performed for the reported data?	X				
		Was applicable and available technology used to lower the SDL and minimize the matrix interference affects on the sample results?	X				
		Is the laboratory NELAC-accredited under the Texas Laboratory Program for the analytes, matrices and methods associated with this laboratory data package?	X				

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);NA = Not Applicable; NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

Laboratory Review Checklist: Supporting Data							
Laboratory Name: ALS Laboratory Group			LRC Date: 05/06/2025				
Project Name: NRG WA Parish CCR Resample			Laboratory Job Number: HS25041618				
Reviewer Name: Andy Neir			Prep Batch Number(s): R512409,R512513				
#[1]	**A[2]**	**Description**	**Yes**	**No**	**NA[3]**	**NR[4]**	**ER#[5]**
S1	OI	**Initial calibration (ICAL)**					
		Were response factors and/or relative response factors for each analyte within QC limits?	X				
		Were percent RSDs or correlation coefficient criteria met?	X				
		Was the number of standards recommended in the method used for all analytes?	X				
		Were all points generated between the lowest and highest standard used to calculate the curve?	X				
		Are ICAL data available for all instruments used?	X				
		Has the initial calibration curve been verified using an appropriate second source standard?	X				
S2	OI	**Initial and continuing calibration verification (ICCV and CCV) and continuing calibration blank (CCB)**					
		Was the CCV analyzed at the method-required frequency?	X				
		Were percent differences for each analyte within the method-required QC limits?	X				
		Was the ICAL curve verified for each analyte?	X				
		Was the absolute value of the analyte concentration in the inorganic CCB < MDL?	X				
S3	O	**Mass spectral tuning:**					
		Was the appropriate compound for the method used for tuning?			X		
		Were ion abundance data within the method-required QC limits?			X		
S4	O	**Internal standards (IS):**					
		Were IS area counts and retention times within the method-required QC limits?			X		
S5	OI	**Raw data** (NELAC section 1 appendix A glossary, and section 5.12 or ISO/IEC 17025 section					
		Were the raw data (for example, chromatograms, spectral data) reviewed by an analyst?	X				
		Were data associated with manual integrations flagged on the raw data?	X				
S6	O	**Dual column confirmation**					
		Did dual column confirmation results meet the method-required QC?			X		
S7	O	**Tentatively identified compounds (TICs):**					
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X		
S8	I	**Interference Check Sample (ICS) results:**					
		Were percent recoveries within method QC limits?			X		
S9	I	**Serial dilutions, post digestion spikes, and method of standard additions**					
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?			X		
S10	OI	**Method detection limit (MDL) studies**					
		Was a MDL study performed for each reported analyte?	X				
		Is the MDL either adjusted or supported by the analysis of DCSs?	X				
S11	OI	**Proficiency test reports:**					
		Was the laboratory's performance acceptable on the applicable proficiency tests or evaluation studies?	X				
S12	OI	**Standards documentation**					
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X				
S13	OI	**Compound/analyte identification procedures**					
		Are the procedures for compound/analyte identification documented?	X				
S14	OI	**Demonstration of analyst competency (DOC)**					
		Was DOC conducted consistent with NELAC Chapter 5C or ISO/IEC 4?	X				
		Is documentation of the analyst's competency up-to-date and on file?	X				
S15	OI	**Verification/validation documentation for methods** (NELAC Chap 5 or ISO/IEC 17025 Section 5)					
		Are all the methods used to generate the data documented, verified, and validated, where applicable?	X				
S16	OI	**Laboratory standard operating procedures (SOPs):**					
		Are laboratory SOPs current and on file for each method performed?	X				

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);
NA = Not Applicable; NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

Laboratory Review Checklist: Exception Reports	
Laboratory Name: ALS Laboratory Group	LRC Date: 05/06/2025
Project Name: NRG WA Parish CCR Resample	Laboratory Job Number: HS25041618
Reviewer Name: Andy Neir	Prep Batch Number(s): R512409,R512513

ER#[5]	**Description**
	No Exceptions

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);
NA = Not Applicable;
NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

Client: TRC
Project: NRG WA Parish CCR Resample
Work Order: HS25041618

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS25041618-01	MW-61R	Water		30-Apr-2025 08:50	30-Apr-2025 09:40	☐

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG WA Parish CCR Resample		WorkOrder:HS25041618
Sample ID:	MW-61R		Lab ID:HS25041618-01
Collection Date:	30-Apr-2025 08:50		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Sulfate	**626**		**2.00**	**5.00**	**mg/L**	10	02-May-2025 11:42
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,900**		**3.00**	**10.0**	**mg/L**	1	05-May-2025 10:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client: TRC
Project: NRG WA Parish CCR Resample
WorkOrder: HS25041618

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: R512409 (0)	**Test Name :** ANIONS BY E300.0, REV 2.1, 1993				**Matrix:** Water	
HS25041618-01	MW-61R	30 Apr 2025 08:50			02 May 2025 11:42	10
Batch ID: R512513 (0)	**Test Name :** TOTAL DISSOLVED SOLIDS BY SM2540C				**Matrix:** Water	
HS25041618-01	MW-61R	30 Apr 2025 08:50			05 May 2025 10:30	1

WorkOrder: HS25041618
InstrumentID: ICS-Integrion
Test Code: 300_W
Test Number: E300
Test Name: Anions by E300.0, Rev 2.1, 1993

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Sulfate	14808-79-8	0.250	0.280	0.200	0.500

WorkOrder: HS25041618
InstrumentID: Balance1
Test Code: TDS_W 2540C
Test Number: M2540C
Test Name: Total Dissolved Solids by SM2540C

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Total Dissolved Solids (Residue, Filterable)	TDS	5.00	4.00	3.00	10.0

Client: TRC
Project: NRG WA Parish CCR Resample
WorkOrder: HS25041618

QC BATCH REPORT

Batch ID: R512409 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY E300.0, REV 2.1, 1993

MBLK Sample ID: **MBLK** Units: **mg/L** Analysis Date: **02-May-2025 09:51**
Client ID: Run ID: **ICS-Integrion_512409** SeqNo: **8811633** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	< 0.200	0.500								

LCS Sample ID: **LCS** Units: **mg/L** Analysis Date: **02-May-2025 09:57**
Client ID: Run ID: **ICS-Integrion_512409** SeqNo: **8811634** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	19.67	0.500	20	0	98.4	90 - 110				

MS Sample ID: **HS25050029-04MS** Units: **mg/L** Analysis Date: **02-May-2025 10:14**
Client ID: Run ID: **ICS-Integrion_512409** SeqNo: **8811637** PrepDate: DF: **50**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	2115	25.0	500	1628	97.4	80 - 120				

MS Sample ID: **HS25041655-08MS** Units: **mg/L** Analysis Date: **02-May-2025 11:59**
Client ID: Run ID: **ICS-Integrion_512409** SeqNo: **8811653** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	106.1	5.00	100	10.65	95.4	80 - 120				

MSD Sample ID: **HS25050029-04MSD** Units: **mg/L** Analysis Date: **02-May-2025 10:20**
Client ID: Run ID: **ICS-Integrion_512409** SeqNo: **8811638** PrepDate: DF: **50**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	2140	25.0	500	1628	102	80 - 120	2115	1.18	20	

MSD Sample ID: **HS25041655-08MSD** Units: **mg/L** Analysis Date: **02-May-2025 12:05**
Client ID: Run ID: **ICS-Integrion_512409** SeqNo: **8811654** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	108	5.00	100	10.65	97.4	80 - 120	106.1	1.79	20	

The following samples were analyzed in this batch: HS25041618-01

Client: TRC
Project: NRG WA Parish CCR Resample
WorkOrder: HS25041618

QC BATCH REPORT

Batch ID: R512513 (0) **Instrument:** Balance1 **Method:** TOTAL DISSOLVED SOLIDS BY SM2540C

MBLK Sample ID: **WMBLK-05052025** Units: **mg/L** Analysis Date: **05-May-2025 10:30**
Client ID: Run ID: **Balance1_512513** SeqNo: **8813485** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	< 3.00	10.0								

LCS Sample ID: **WLCS-05052025** Units: **mg/L** Analysis Date: **05-May-2025 10:30**
Client ID: Run ID: **Balance1_512513** SeqNo: **8813484** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1044	10.0	1000	0	104	85 - 115				

DUP Sample ID: **HS2505058-01DUP** Units: **mg/L** Analysis Date: **05-May-2025 10:30**
Client ID: Run ID: **Balance1_512513** SeqNo: **8813479** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1576	10.0					1528	3.09	20	

DUP Sample ID: **HS25050078-01DUP** Units: **mg/L** Analysis Date: **05-May-2025 10:30**
Client ID: Run ID: **Balance1_512513** SeqNo: **8813481** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	2120	10.0					2230	5.06	20	

The following samples were analyzed in this batch: HS25041618-01

Client: TRC
Project: NRG WA Parish CCR Resample
WorkOrder: **HS25041618**

QUALIFIERS, ACRONYMS, UNITS

Qualifier	Description
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte detected below quantitation limit
M	Manually integrated, see raw data for justification
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL/SDL

Acronym	Description
DCS	Detectability Check Study
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitaion Limit
SD	Serial Dilution
SDL	Sample Detection Limit
TRRP	Texas Risk Reduction Program

CERTIFICATIONS,ACCREDITATIONS & LICENSES

Agency	Number	Expire Date
Arizona	AZ0793	27-May-2026
Arkansas	88-00356_2024	17-Mar-2026
Dept of Defense	L24-239	30-Apr-2026
Dept of Defense	L24-240	30-Apr-2026
Florida	E87611-38	30-Jun-2025
Illinois	2000322023-11	31-Jul-2025
Kansas	E-10352 2023-2024	31-Jul-2025
Louisiana	03087 2023-2024	30-Jun-2025
Maine	2024017	23-Jun-2026
Minnesota	2856348	31-Dec-2025
Missouri	136	30-Sep-2026
New Hampshire	209425	24-Apr-2026
New Jersey	TX008	30-Jun-2025
North Carolina	624 - 2024	31-Dec-2025
North Dakota	R-193 2023-2024	30-Sep-2025
Oklahoma	2023-140	31-Aug-2025
Pennsylvania	018	30-Jun-2025
Tennessee	TN	30-Apr-2026
Texas	T104704231 TX-C24-00130	30-Apr-2026
Utah	TX026932023-14	31-Jul-2025

Sample Receipt Checklist

Work Order ID:	HS25041618	**Date/Time Received:**	**30-Apr-2025 09:40**
Client Name:	TRC-HOU	**Received by:**	**Paresh M. Giga**

Completed By:	*/S/ Paresh M. Giga*	30-Apr-2025 12:02	**Reviewed by:**	*/S/ Andy C. Neir*	30-Apr-2025 23:02
	eSignature	Date/Time		eSignature	Date/Time

Matrices: **Water** Carrier name: **Client**

	Yes	No	Not Present
Shipping container/cooler in good condition?	☑	☐	☐
Custody seals intact on shipping container/cooler?	☑	☐	☐
Custody seals intact on sample bottles?	☐	☐	☑
VOA/TX1005/TX1006 Solids in hermetically sealed vials?	☐	☐	☑
Chain of custody present?	☑	☐	1 Page(s)
Chain of custody signed when relinquished and received?	☑	☐	COC IDs:none
Samplers name present on COC?	☑	☐	
Chain of custody agrees with sample labels?	☑	☐	
Samples in proper container/bottle?	☑	☐	
Sample containers intact?	☑	☐	
Sufficient sample volume for indicated test?	☑	☐	
All samples received within holding time?	☑	☐	
Container/Temp Blank temperature in compliance?	☑	☐	

Temperature(s)/Thermometer(s):	3.4C U/C	IR36
Cooler(s)/Kit(s):	Red	
Date/Time sample(s) sent to storage:	4/30/25 12:10	

	Yes	No	
Water - VOA vials have zero headspace?	☐	☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	☐	☐	N/A ☑
pH adjusted?	☐	☐	N/A ☑

pH adjusted by:

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

Corrective Action:

ALS Laboratory Group
10450 Stancliff Rd. #210
Houston, Texas 77099
(Tel) 281.530.5656
(Fax) 281.530.5887

Chain of Custody Form

Page 1 of 1

HS25041618
TRC
NRG WA Parish CCRS Resample

ALS Project Manager:

Customer Information		Project Information			
Purchase Order		Project Name	WA Parish CCR Resample	A	300_W (SO4)
Work Order		Project Number	528472.0000.0000	B	TDS_W 2540C (TDS) - Appendix III
Company Name	TRC Corporation	Bill To Company	TRC	C	
Send Report To	Lori Burris	Invoice Attn.	A/P	D	
Address	11767 Katy Freeway	Address	11767 Katy Freeway	E	
	Suite 230		Suite 230	F	
City/State/Zip	Houston, TX 77079	City/State/Zip	Houston, TX 77079	G	
Phone	713-244-1000	Phone	713-244-1000	H	
Fax	713-244-1099	Fax	713-244-1099	I	
e-Mail Address	Lburris@trcsolutions.com	e-Mail Address	apinvoiceapproval@trcsolutions.com	J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	MW-61R	4-30-25	850	Water	8	2	X	X									
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s): Please Print & Sign: Cody Springer

Shipment Method: Drop off @ lab

Required Turnaround Time: ☐ Other ______ ☐ STD 10 Wk Days ☑ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour

Results Due Date:

Relinquished by:	Date: 4-30-25	Time: 940	Received by:	Notes: NRG WA Parish - PRIVILEGED & CONFIDENTIAL
Relinquished by:	Date:	Time:	Received by (Laboratory): 4/30/25 09:40	Cooler Temp. ...
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory): RD	3.4° #36

QC Package: (Check Box Below)

	Level II: Standard QC	X	TRRP-Checklist
	Level III: Std QC + Raw Data		TRRP Level IV
	Level IV: SW846 CLP-Like		
	Other:		

Preservative Key: 1-HCL 2-HNO3 3-H2SO4 4-NaOH 5-Na2S2O3 6-NaHSO4 7-Other 8-4 degrees C 9-5035

Note: Any changes must be made in writing once samples and COC Form have been submitted to ALS Laboratory Group.

Privileged and Confidential

ALS

10450 Stancliff Rd., Suite 210
Houston, Texas 77099
Tel. +1 281 530 5656
Fax. +1 281 530 5887

CUSTODY SEAL

Date: 1-30-15 Time:

Name: [illegible]

Company: NML

Seal Broken By: [illegible]

Date: 1/30/15

Appendix B

Detection Monitoring Data
(August 2025)

10450 Stancliff Rd. Suite 210
Houston, TX 77099
T: +1 281 530 5656
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October 30, 2025

Lori Burris
TRC
11767 Katy Freeway
Suite 850
Houston, TX 77079

Work Order: **HS25080440**

Laboratory Results for: **WA Parish CCR Program**

Dear Lori Burris,

ALS Environmental received 28 sample(s) on Aug 08, 2025 for the analysis presented in the following report.

This is a REVISED REPORT. Please see the Case Narrative for discussion concerning this revision.

Regards,

Generated By: JUMOKE.LAWAL

Andy C. Neir
Project Manager

Client:	TRC	**TRRP Laboratory Data Package Cover Page**
Project:	WA Parish CCR Program	
WorkOrder:	**HS25080440**	

This data package consists of all or some of the following as applicable:

This signature page, the laboratory review checklist, and the following reportable data:

R1 Field chain-of-custody documentation;

R2 Sample identification cross-reference;

R3 Test reports (analytical data sheets) for each environmental sample that includes:
a) Items consistent with NELAC Chapter 5,
b) dilution factors,
c) preparation methods,
d) cleanup methods, and
e) if required for the project, tentatively identified compounds (TICs).

R4 Surrogate recovery data including:
a) Calculated recovery (%R), and
b) The laboratory's surrogate QC limits.

R5 Test reports/summary forms for blank samples;

R6 Test reports/summary forms for laboratory control samples (LCSs) including:
a) LCS spiking amounts,
b) Calculated %R for each analyte, and
c)The laboratory's LCS QC limits.

R7 Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
a) Samples associated with the MS/MSD clearly identified,
b) MS/MSD spiking amounts,
c) Concentration of each MS/MSD analyte measured in the parent and spiked samples,
d) Calculated %Rs and relative percent differences (RPDs), and
e) The laboratory's MS/MSD QC limits.

R8 Laboratory analytical duplicate (if applicable) recovery and precision:
a) the amount of analyte measured in the duplicate,
b) the calculated RPD, and
c) the laboratory's QC limits for analytical duplicates.

R9 List of method quantitation limits (MQLs) and detectability check sample results for each analyte for each method and matrix.

R10 Other problems or anomalies.
The Exception Report for each "No" or "Not Reviewed (NR)" item in Laboratory Review Checklist and for each analyte, matrix, and method for which the laboratory does not hold NELAC accreditation under the Texas Laboratory Accreditation Program.

Client:	TRC
Project:	WA Parish CCR Program
WorkOrder:	**HS25080440**

TRRP Laboratory Data Package Cover Page

Release Statement: I am responsible for the release of this laboratory data package. This laboratory is NELAC accredited under the Texas Laboratory Accreditation Program for all the methods, analytes and matrices reported in this data package except as noted in the Exception Reports. The data have been reviewed and are technically compliant with the requirements of the methods used, except where noted by the laboratory in the attached exception reports. By my signature below, I affirm to the best of my knowledge, all problems/anomalies, observed by the laboratory have been identified by the laboratory in the Laboratory Review Checklist, and no information affecting the quality of the data has been knowingly withheld.

Check, if applicable: [NA] This laboratory meets an exception under 30 TAC §25.6 and was last inspected by [ ] TCEQ or [ ] _______________ on (enter date of last inspection). Any findings affecting the data in this laboratory data package are noted in the Exception Reports herein. The official signing the cover page of the report in which these data are used is responsible for releasing this data package and is by signature affirming the above release statement is true.

Andy C. Neir
Project Manager

Laboratory Review Checklist: Reportable Data

Laboratory Name: ALS Laboratory Group	LRC Date: 08/18/2025
Project Name: WA Parish CCR Program	Laboratory Job Number: HS25080440
Reviewer Name: Andy Neir	Prep Batch Number(s): 231672,231673,231714,R519447,R519448,R519449,R519463,R519466, R519875

#[1]	A[2]	Description	Yes	No	NA[3]	NR[4]	ER#[5]
R1	OI	**Chain-of-custody (C-O-C)**					
		Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?	X				
		Were all departures from standard conditions described in an exception report?	X				
R2	OI	**Sample and quality control (QC) identification**					
		Are all field sample ID numbers cross-referenced to the laboratory ID numbers?	X				
		Are all laboratory ID numbers cross-referenced to the corresponding QC data?	X				
R3	OI	**Test reports**					
		Were all samples prepared and analyzed within holding times?	X				
		Other than those results < MQL, were all other raw values bracketed by calibration standards?	X				
		Were calculations checked by a peer or supervisor?	X				
		Were all analyte identifications checked by a peer or supervisor?	X				
		Were sample detection limits reported for all analytes not detected?	X				
		Were all results for soil and sediment samples reported on a dry weight basis?			X		
		Were % moisture (or solids) reported for all soil and sediment samples?			X		
		Were bulk soils/solids samples for volatile analysis extracted with methanol per SW-846 Method 5035?			X		
		If required for the project, TICs reported?			X		
R4	O	**Surrogate recovery data**					
		Were surrogates added prior to extraction?			X		
		Were surrogate percent recoveries in all samples within the laboratory QC limits?			X		
R5	OI	**Test reports/summary forms for blank samples**					
		Were appropriate type(s) of blanks analyzed?	X				
		Were blanks analyzed at the appropriate frequency?	X				
		Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X				
		Were blank concentrations < MQL?	X				
R6	OI	**Laboratory control samples (LCS):**					
		Were all COCs included in the LCS?	X				
		Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X				
		Were LCSs analyzed at the required frequency?	X				
		Were LCS (and LCSD, if applicable) %Rs within the laboratory QC limits?	X				
		Does the detectability data document the laboratory's capability to detect the COCs at the MDL used to calculate the SDLs?	X				
		Was the LCSD RPD within QC limits?	X				
R7	OI	**Matrix spike (MS) and matrix spike duplicate (MSD) data**					
		Were the project/method specified analytes included in the MS and MSD?	X				
		Were MS/MSD analyzed at the appropriate frequency?	X				
		Were MS (and MSD, if applicable) %Rs within the laboratory QC limits?		X			1
		Were MS/MSD RPDs within laboratory QC limits?	X				
R8	OI	**Analytical duplicate data**					
		Were appropriate analytical duplicates analyzed for each matrix?	X				
		Were analytical duplicates analyzed at the appropriate frequency?	X				
		Were RPDs or relative standard deviations within the laboratory QC limits?	X				
R9	OI	**Method quantitation limits (MQLs):**					
		Are the MQLs for each method analyte included in the laboratory data package?	X				
		Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X				
		Are unadjusted MQLs and DCSs included in the laboratory data package?	X				
R10	OI	**Other problems/anomalies**					
		Are all known problems/anomalies/special conditions noted in this LRC and ER?	X				
		Were all necessary corrective actions performed for the reported data?	X				
		Was applicable and available technology used to lower the SDL and minimize the matrix interference affects on the sample results?		X			2
		Is the laboratory NELAC-accredited under the Texas Laboratory Program for the analytes, matrices and methods associated with this laboratory data package?	X				

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);NA = Not Applicable; NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

Laboratory Review Checklist: Supporting Data								
Laboratory Name: ALS Laboratory Group			LRC Date: 08/18/2025					
Project Name: WA Parish CCR Program			Laboratory Job Number: HS25080440					
Reviewer Name: Andy Neir			Prep Batch Number(s): 231672,231673,231714,R519447,R519448,R519449,R519463,R519466,R519875					
#[1]	**A[2]**	**Description**	**Yes**	**No**	**NA[3]**	**NR[4]**	**ER#[5]**
S1	OI	**Initial calibration (ICAL)**					
		Were response factors and/or relative response factors for each analyte within QC limits?	X				
		Were percent RSDs or correlation coefficient criteria met?	X				
		Was the number of standards recommended in the method used for all analytes?	X				
		Were all points generated between the lowest and highest standard used to calculate the curve?	X				
		Are ICAL data available for all instruments used?	X				
		Has the initial calibration curve been verified using an appropriate second source standard?	X				
S2	OI	**Initial and continuing calibration verification (ICCV and CCV) and continuing calibration blank (CCB)**					
		Was the CCV analyzed at the method-required frequency?	X				
		Were percent differences for each analyte within the method-required QC limits?	X				
		Was the ICAL curve verified for each analyte?	X				
		Was the absolute value of the analyte concentration in the inorganic CCB < MDL?		X			3
S3	O	**Mass spectral tuning:**					
		Was the appropriate compound for the method used for tuning?	X				
		Were ion abundance data within the method-required QC limits?	X				
S4	O	**Internal standards (IS):**					
		Were IS area counts and retention times within the method-required QC limits?	X				
S5	OI	**Raw data** (NELAC section 1 appendix A glossary, and section 5.12 or ISO/IEC 17025 section					
		Were the raw data (for example, chromatograms, spectral data) reviewed by an analyst?	X				
		Were data associated with manual integrations flagged on the raw data?	X				
S6	O	**Dual column confirmation**					
		Did dual column confirmation results meet the method-required QC?			X		
S7	O	**Tentatively identified compounds (TICs):**					
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X		
S8	I	**Interference Check Sample (ICS) results:**					
		Were percent recoveries within method QC limits?	X				
S9	I	**Serial dilutions, post digestion spikes, and method of standard additions**					
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?	X				
S10	OI	**Method detection limit (MDL) studies**					
		Was a MDL study performed for each reported analyte?	X				
		Is the MDL either adjusted or supported by the analysis of DCSs?	X				
S11	OI	**Proficiency test reports:**					
		Was the laboratory's performance acceptable on the applicable proficiency tests or evaluation studies?	X				
S12	OI	**Standards documentation**					
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X				
S13	OI	**Compound/analyte identification procedures**					
		Are the procedures for compound/analyte identification documented?	X				
S14	OI	**Demonstration of analyst competency (DOC)**					
		Was DOC conducted consistent with NELAC Chapter 5C or ISO/IEC 4?	X				
		Is documentation of the analyst's competency up-to-date and on file?	X				
S15	OI	**Verification/validation documentation for methods** (NELAC Chap 5 or ISO/IEC 17025 Section 5)					
		Are all the methods used to generate the data documented, verified, and validated, where applicable?	X				
S16	OI	**Laboratory standard operating procedures (SOPs):**					
		Are laboratory SOPs current and on file for each method performed?	X				

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);
NA = Not Applicable; NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

<table>
<tr><th colspan="2">Laboratory Review Checklist: Exception Reports</th></tr>
<tr><td>Laboratory Name: ALS Laboratory Group</td><td>LRC Date: 08/18/2025</td></tr>
<tr><td>Project Name: WA Parish CCR Program</td><td>Laboratory Number: HS25080440</td></tr>
<tr><td>Reviewer Name: Andy Neir</td><td>Prep Batch Number(s): 231672,231673,231714,R519447,R519448,R519449,R519463,R519466,R519875</td></tr>
</table>

ER#[5]	Description
1	Batch 231672, Metals Method SW6020, sample MW-63, MSD recovered outside the control limit for Calcium, however, the result in the parent sample is 4x greater than the spike amount Batch 231673, Metals Method SW6020, sample HS25080442-07, MS and MSD were performed on unrelated sample Batch 231714, Metals Method SW6020, sample MW-58, MS and or MSD recovered outside the control limit for Calcium however, the result in the parent sample is 4x greater than the spike amount. Batch R519463 Anions Method E300, sample MW-58, MS and MSD recovered outside the control limit for Sulfate however, the result in the parent sample is 4x greater than the spike amount. Batch R519463 Anions Method E300, sample MW-63, MS and MSD recovered outside the control limit for sulfate due to sample matrix interference. Batch R519466, Anions Method E300, sample HS25080442-02, MS and MSD were performed on unrelated sample Batch R519466, Anions Method E300, sample HS25080421-01, MS and MSD were performed on unrelated sample
2	REV01: Final report revised on 10/302025 to include revised Report final from ALS Holland sub lab. New final included report to indicate what samples were ran in the two QC batches. The analysis for Fluoride was subcontracted to ALS Environmental in Holland MI. Report and Laboratory Review Checklist are attached to the final report
3	See Run Log and CCB Exceptions Report.

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);
NA = Not Applicable;
NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

FORM 13 - ANALYSIS RUN LOG

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440
Start Date: 15-Aug-2025 End Date: 15-Aug-2025

Run ID:ICPMS06_519755
Instrument:ICPMS06
Method:SW6020A

Sample No.	D/F	Time	FileID	Analytes
ICV	1	15-Aug-2025 09:50	021_ICV.d	B CA
LLICV5	1	15-Aug-2025 09:51	022LCV5.d	B CA
LLICV2	1	15-Aug-2025 09:53	023LCV2.d	B CA
ICB	1	15-Aug-2025 09:55	024_ICB.d	B CA
ICSA	1	15-Aug-2025 09:59	026ICSA.d	B CA
ICSAB	1	15-Aug-2025 10:02	027ICSB.d	B CA
CCV 1	1	15-Aug-2025 10:10	030_CCV.d	B CA
CCB 1	1	15-Aug-2025 10:12	031_CCB.d	B CA
CCV 2	1	15-Aug-2025 10:38	042_CCV.d	B CA
CCB 2	1	15-Aug-2025 10:40	043_CCB.d	B CA
CCV 3	1	15-Aug-2025 11:08	054_CCV.d	B CA
CCB 3	1	15-Aug-2025 11:10	055_CCB.d	B CA
CCV 4	1	15-Aug-2025 11:35	066_CCV.d	B CA
CCB 4	1	15-Aug-2025 11:37	067_CCB.d	B CA
CCV 5	1	15-Aug-2025 12:01	078_CCV.d	B CA
CCB 5	1	15-Aug-2025 12:03	079_CCB.d	B CA
CCV 6	1	15-Aug-2025 12:28	090_CCV.d	B CA
CCB 6	1	15-Aug-2025 12:30	091_CCB.d	B CA
CCV 7	1	15-Aug-2025 12:52	102_CCV.d	B CA
CCB 7	1	15-Aug-2025 12:53	103_CCB.d	B CA
CCV 8	1	15-Aug-2025 13:18	112_CCV.d	B CA
CCB 8	1	15-Aug-2025 13:20	113_CCB.d	B CA
MBLK-231714	1	15-Aug-2025 13:23	114SMPL.d	B CA
LCS-231714	1	15-Aug-2025 13:25	115SMPL.d	B CA
MW-58SD	5	15-Aug-2025 13:27	116SMPL.d	CA
MW-58	1	15-Aug-2025 13:31	118SMPL.d	CA
MW-58MS	1	15-Aug-2025 13:33	119SMPL.d	B CA
MW-58MSD	1	15-Aug-2025 13:35	120SMPL.d	B CA
MW-58PDS	1	15-Aug-2025 13:37	121SMPL.d	CA
CCV 9	1	15-Aug-2025 13:43	124_CCV.d	B CA
CCB 9	1	15-Aug-2025 13:45	125_CCB.d	B CA
MW-54	1	15-Aug-2025 13:51	128SMPL.d	B CA
MW-55R	1	15-Aug-2025 13:53	129SMPL.d	B CA
MW-65	1	15-Aug-2025 13:55	130SMPL.d	B
MW-36	1	15-Aug-2025 13:57	131SMPL.d	B
CCV 10	1	15-Aug-2025 14:11	136_CCV.d	B CA
CCB 10	1	15-Aug-2025 14:13	137_CCB.d	B CA
CCV 11	1	15-Aug-2025 14:39	148_CCV.d	B CA
CCB 11	1	15-Aug-2025 14:41	149_CCB.d	B CA
CCV 12	1	15-Aug-2025 14:57	157_CCV.d	B CA
CCB 12	1	15-Aug-2025 14:59	158_CCB.d	B CA
MW-65	20	15-Aug-2025 15:03	159SMPL.d	CA
MW-58	10	15-Aug-2025 15:04	160SMPL.d	B
MW-58SD	50	15-Aug-2025 15:06	161SMPL.d	B
MW-36	20	15-Aug-2025 15:10	163SMPL.d	CA
MW-58PDS	10	15-Aug-2025 15:22	166SMPL.d	B
CCV 13	1	15-Aug-2025 15:28	168_CCV.d	B CA
CCB 13	1	15-Aug-2025 15:29	169_CCB.d	B CA
CCV 14	1	15-Aug-2025 15:53	180_CCV.d	B CA
CCB 14	1	15-Aug-2025 15:55	181_CCB.d	B CA

FORM 13 - ANALYSIS RUN LOG

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440
Start Date: 15-Aug-2025 End Date: 15-Aug-2025

Run ID:ICPMS06_519755
Instrument:ICPMS06
Method:SW6020A

Sample No.	D/F	Time	FileID	Analytes
CCV 15	1	15-Aug-2025 16:17	192_CCV_081525A.D	B CA
CCB 15	1	15-Aug-2025 16:19	193_CCB_081525A.D	B CA

FORM 13 - ANALYSIS RUN LOG

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440
Start Date: 15-Aug-2025 End Date: 15-Aug-2025

Run ID:ICPMS07_519753
Instrument:ICPMS07
Method:SW6020A

Sample No.	D/F	Time	FileID	Analytes
ICV	1	15-Aug-2025 10:05	019_ICV.d	B CA
LLICV5	1	15-Aug-2025 10:08	020LCV5.d	B CA
LLICV2	1	15-Aug-2025 10:10	021LCV2.d	B CA
ICB	1	15-Aug-2025 10:12	022_ICB.d	B CA
ICSA	1	15-Aug-2025 10:15	023ICSA.d	B CA
ICSAB	1	15-Aug-2025 10:17	024ICSB.d	B CA
CCV 1	1	15-Aug-2025 10:27	027_CCV.d	B CA
CCB 1	1	15-Aug-2025 10:29	028_CCB.d	B CA
MBLK-231673	1	15-Aug-2025 10:34	030SMPL.d	B CA
ZZZZZZZSD	5	15-Aug-2025 10:36	031SMPL.d	B
ZZZZZZZMS	1	15-Aug-2025 10:41	033SMPL.d	B CA
ZZZZZZZMSD	1	15-Aug-2025 10:43	034SMPL.d	B CA
ZZZZZZZPDS	1	15-Aug-2025 10:45	035SMPL.d	B
LCS-231673	1	15-Aug-2025 10:48	036SMPL.d	B CA
CCV 2	1	15-Aug-2025 10:55	039_CCV.d	B CA
CCB 2	1	15-Aug-2025 10:57	040_CCB.d	B CA
CCV 3	1	15-Aug-2025 11:24	051_CCV.d	B CA
CCB 3	1	15-Aug-2025 11:26	052_CCB.d	B CA
ZZZZZZZPDS	20	15-Aug-2025 11:43	059SMPL.d	CA
ZZZZZZZSD	100	15-Aug-2025 11:47	061SMPL.d	CA
CCV 4	1	15-Aug-2025 11:52	063_CCV.d	B CA
CCB 4	1	15-Aug-2025 12:16	066_CCB.d	B CA
MW-37	5	15-Aug-2025 12:18	067SMPL.d	B CA
MW-38R	5	15-Aug-2025 12:21	068SMPL.d	B CA
MW-60	5	15-Aug-2025 12:23	069SMPL.d	CA
MW-61R	5	15-Aug-2025 12:25	070SMPL.d	CA
Field Duplicate 1	5	15-Aug-2025 12:30	072SMPL.d	CA
Field Duplicate 2	5	15-Aug-2025 12:32	073SMPL.d	CA
CCV 5	1	15-Aug-2025 12:43	077_CCV.d	B CA
CCB 5	1	15-Aug-2025 12:46	078_CCB.d	B CA
MW-60	1	15-Aug-2025 12:48	079SMPL.d	B
MW-61R	1	15-Aug-2025 12:50	080SMPL.d	B
Field Duplicate 1	1	15-Aug-2025 12:56	082SMPL.d	B
Field Duplicate 2	1	15-Aug-2025 12:58	083SMPL.d	B
Field Blank-01	1	15-Aug-2025 13:08	087SMPL.d	B CA
CCV 6	1	15-Aug-2025 13:12	089_CCV.d	B CA
CCB 6	1	15-Aug-2025 13:15	090_CCB.d	B CA
CCV 7	1	15-Aug-2025 13:40	101_CCV.d	B CA
CCB 7	1	15-Aug-2025 13:43	102_CCB.d	B CA
CCV 8	1	15-Aug-2025 14:09	113_CCV.d	B CA
CCB 8	1	15-Aug-2025 14:11	114_CCB.d	B CA
CCV 9	1	15-Aug-2025 14:37	125_CCV.d	B CA
CCB 9	1	15-Aug-2025 14:39	126_CCB.d	B CA
CCV 10	1	15-Aug-2025 15:05	137_CCV.d	B CA
CCB 10	1	15-Aug-2025 15:07	138_CCB.d	B CA
CCV 11	1	15-Aug-2025 15:12	140_CCV.d	B CA
CCB 11	1	15-Aug-2025 15:14	141_CCB.d	B CA
LLCCV2	1	15-Aug-2025 15:19	143LCV2.d	B CA
LLCCV5	1	15-Aug-2025 15:21	144LCV5.d	B CA
ICSA	1	15-Aug-2025 15:26	146ICSA.d	B CA

FORM 13 - ANALYSIS RUN LOG

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440
Start Date: 15-Aug-2025 End Date: 15-Aug-2025

Run ID:ICPMS07_519753
Instrument:ICPMS07
Method:SW6020A

Sample No.	D/F	Time	FileID	Analytes
ICSAB	1	15-Aug-2025 15:29	147ICSB.d	B CA

CCB EXCEPTIONS REPORT

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

Run ID:ICPMS06_519755
Instrument:ICPMS06
Method:SW6020A

CCB 2	Date: 15-Aug-2025 10:40	Seq: 8987612	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	12.71	8	50

CCB 3	Date: 15-Aug-2025 11:10	Seq: 8987911	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	9.368	8	50

CCB 5	Date: 15-Aug-2025 12:03	Seq: 8988333	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	13.12	8	50

CCB 6	Date: 15-Aug-2025 12:30	Seq: 8988345	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	13.48	8	50

CCB 7	Date: 15-Aug-2025 12:53	Seq: 8988357	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	8.701	8	50

CCB 9	Date: 15-Aug-2025 13:45	Seq: 8988457	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	10.83	8	50

CCB 15	Date: 15-Aug-2025 16:19	Seq: 8988880	D/F: 1	Units: ug/L
	Analyte	**Result**	**MDL**	**Report Limit**
	Boron	8.605	8	50

CCB EXCEPTIONS REPORT

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

Run ID:ICPMS07_519753
Instrument:ICPMS07
Method:SW6020A

CCB	Date	Seq	D/F	Units
CCB 1	15-Aug-2025 10:29	8987789	1	ug/L

Analyte	Result	MDL	Report Limit
Boron	12.62	8	50

CCB	Date	Seq	D/F	Units
CCB 2	15-Aug-2025 10:57	8987798	1	ug/L

Analyte	Result	MDL	Report Limit
Boron	17.69	8	50

CCB	Date	Seq	D/F	Units
CCB 3	15-Aug-2025 11:26	8987931	1	ug/L

Analyte	Result	MDL	Report Limit
Boron	14.84	8	50

CCB	Date	Seq	D/F	Units
CCB 4	15-Aug-2025 12:16	8988122	1	ug/L

Analyte	Result	MDL	Report Limit
Boron	12.67	8	50

CCB	Date	Seq	D/F	Units
CCB 5	15-Aug-2025 12:46	8988197	1	ug/L

Analyte	Result	MDL	Report Limit
Boron	16.47	8	50

CCB	Date	Seq	D/F	Units
CCB 6	15-Aug-2025 13:15	8988366	1	ug/L

Analyte	Result	MDL	Report Limit
Boron	16.05	8	50

CCB	Date	Seq	D/F	Units
CCB 7	15-Aug-2025 13:43	8988434	1	ug/L

Analyte	Result	MDL	Report Limit
Boron	13.15	8	50

CCB	Date	Seq	D/F	Units
CCB 8	15-Aug-2025 14:11	8988478	1	ug/L

Analyte	Result	MDL	Report Limit
Boron	15.36	8	50

CCB	Date	Seq	D/F	Units
CCB 9	15-Aug-2025 14:39	8989091	1	ug/L

Analyte	Result	MDL	Report Limit
Boron	17.2	8	50

CCB	Date	Seq	D/F	Units
CCB 10	15-Aug-2025 15:07	8989103	1	ug/L

Analyte	Result	MDL	Report Limit
Boron	18.71	8	50

CCB	Date	Seq	D/F	Units
CCB 11	15-Aug-2025 15:14	8989106	1	ug/L

Analyte	Result	MDL	Report Limit
Boron	17.45	8	50

Client: TRC
Project: WA Parish CCR Program
Work Order: HS25080440

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS25080440-01	MW-39R	Water		08-Aug-2025 08:35	08-Aug-2025 13:15	☐
HS25080440-02	MW-40	Water		08-Aug-2025 09:55	08-Aug-2025 13:15	☐
HS25080440-03	MW-41	Water		08-Aug-2025 11:10	08-Aug-2025 13:15	☐
HS25080440-04	MW-62	Water		08-Aug-2025 09:15	08-Aug-2025 13:15	☐
HS25080440-05	MW-63	Water		08-Aug-2025 11:50	08-Aug-2025 13:15	☐
HS25080440-06	MW-64	Water		08-Aug-2025 10:35	08-Aug-2025 13:15	☐
HS25080440-07	MW-23R	Water		08-Aug-2025 11:45	08-Aug-2025 13:15	☐
HS25080440-08	MW-28D	Water		08-Aug-2025 09:50	08-Aug-2025 13:15	☐
HS25080440-09	MW-42	Water		08-Aug-2025 10:25	08-Aug-2025 13:15	☐
HS25080440-10	MW-43	Water		08-Aug-2025 12:25	08-Aug-2025 13:15	☐
HS25080440-11	MW-44	Water		08-Aug-2025 08:55	08-Aug-2025 13:15	☐
HS25080440-12	MW-46R	Water		08-Aug-2025 08:05	08-Aug-2025 13:15	☐
HS25080440-13	MW-47	Water		08-Aug-2025 10:50	08-Aug-2025 13:15	☐
HS25080440-14	MW-48	Water		08-Aug-2025 10:15	08-Aug-2025 13:15	☐
HS25080440-15	MW-50	Water		08-Aug-2025 08:40	08-Aug-2025 13:15	☐
HS25080440-16	MW-52	Water		08-Aug-2025 09:20	08-Aug-2025 13:15	☐
HS25080440-17	MW-54	Water		08-Aug-2025 08:25	08-Aug-2025 13:15	☐
HS25080440-18	MW-55R	Water		08-Aug-2025 09:00	08-Aug-2025 13:15	☐
HS25080440-19	MW-58	Water		08-Aug-2025 09:40	08-Aug-2025 13:15	☐
HS25080440-20	MW-65	Water		08-Aug-2025 09:35	08-Aug-2025 13:15	☐
HS25080440-21	MW-36	Water		08-Aug-2025 09:05	08-Aug-2025 13:15	☐
HS25080440-22	MW-37	Water		08-Aug-2025 11:30	08-Aug-2025 13:15	☐
HS25080440-23	MW-38R	Water		08-Aug-2025 10:55	08-Aug-2025 13:15	☐
HS25080440-24	MW-60	Water		08-Aug-2025 08:20	08-Aug-2025 13:15	☐
HS25080440-25	MW-61R	Water		08-Aug-2025 09:55	08-Aug-2025 13:15	☐
HS25080440-26	Field Blank-01	Water		08-Aug-2025 10:10	08-Aug-2025 13:15	☐

Client: TRC
Project: WA Parish CCR Program
Work Order: HS25080440

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS25080440-27	Field Duplicate 1	Water		08-Aug-2025 11:00	08-Aug-2025 13:15	☐
HS25080440-28	Field Duplicate 2	Water		08-Aug-2025 09:00	08-Aug-2025 13:15	☐

Client:	TRC	**CASE NARRATIVE**
Project:	WA Parish CCR Program	
Work Order:	HS25080440	

Work Order Comments

- Final report revised on 10/302025 to include revised Report final from ALS Holland sub lab. New final included report to indicate what samples were ran in the two QC batches.

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-39R		Lab ID:HS25080440-01
Collection Date:	08-Aug-2025 08:35		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.610**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 14:46
Calcium	**232**		**2.40**	**10.0**	**mg/L**	20	14-Aug-2025 16:00
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**370**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 11:30
Sulfate	**523**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 11:30
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,820**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 07:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Confidential

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-40		Lab ID:HS25080440-02
Collection Date:	08-Aug-2025 09:55		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.101**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:10
Calcium	**275**		**2.40**	**10.0**	**mg/L**	20	14-Aug-2025 16:08
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**497**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 11:36
Sulfate	**97.5**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 11:36
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,720**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 07:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

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Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-41		Lab ID:HS25080440-03
Collection Date:	08-Aug-2025 11:10		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.154**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:12
Calcium	**127**		**0.120**	**0.500**	**mg/L**	1	14-Aug-2025 15:12
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**88.3**		**0.200**	**0.500**	**mg/L**	1	11-Aug-2025 11:41
Sulfate	**169**		**1.00**	**2.50**	**mg/L**	5	11-Aug-2025 12:52
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**840**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

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Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-62		Lab ID:HS25080440-04
Collection Date:	08-Aug-2025 09:15		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.0844**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:14
Calcium	**192**		**2.40**	**10.0**	**mg/L**	20	14-Aug-2025 16:10
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**466**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 11:47
Sulfate	**199**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 11:47
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,430**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

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Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-63		Lab ID:HS25080440-05
Collection Date:	08-Aug-2025 11:50		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.283**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 14:38
Calcium	**244**		**2.40**	**10.0**	**mg/L**	20	14-Aug-2025 16:02
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**237**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 11:53
Sulfate	**566**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 11:53
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,380**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-64		Lab ID:HS25080440-06
Collection Date:	08-Aug-2025 10:35		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.1000**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:16
Calcium	**270**		**2.40**	**10.0**	**mg/L**	20	14-Aug-2025 16:12
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**605**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 11:59
Sulfate	**55.5**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 11:59
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,710**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

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Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-23R		Lab ID:HS25080440-07
Collection Date:	08-Aug-2025 11:45		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.275**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:18
Calcium	**523**		**2.40**	**10.0**	**mg/L**	20	14-Aug-2025 16:14
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**966**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 12:05
Sulfate	**1,510**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 12:05
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**4,560**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-28D		Lab ID:HS25080440-08
Collection Date:	08-Aug-2025 09:50		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.166**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:28
Calcium	**110**		**0.120**	**0.500**	**mg/L**	1	14-Aug-2025 15:28
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**139**		**1.00**	**2.50**	**mg/L**	5	11-Aug-2025 12:11
Sulfate	**99.8**		**1.00**	**2.50**	**mg/L**	5	11-Aug-2025 12:11
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**744**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-42		Lab ID:HS25080440-09
Collection Date:	08-Aug-2025 10:25		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.499**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:30
Calcium	**145**		**0.120**	**0.500**	**mg/L**	1	14-Aug-2025 15:30
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**319**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 12:40
Sulfate	**488**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 12:40
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,610**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

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Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-43		Lab ID:HS25080440-10
Collection Date:	08-Aug-2025 12:25		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.358**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:32
Calcium	**86.1**		**0.120**	**0.500**	**mg/L**	1	14-Aug-2025 15:32
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**222**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 12:46
Sulfate	**67.0**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 12:46
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**820**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-44		Lab ID:HS25080440-11
Collection Date:	08-Aug-2025 08:55		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.191**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:34
Calcium	**104**		**0.120**	**0.500**	**mg/L**	1	14-Aug-2025 15:34
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**216**		**1.00**	**2.50**	**mg/L**	5	11-Aug-2025 13:09
Sulfate	**83.0**		**1.00**	**2.50**	**mg/L**	5	11-Aug-2025 13:09
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**836**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-46R		Lab ID:HS25080440-12
Collection Date:	08-Aug-2025 08:05		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.178**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:36
Calcium	**109**		**0.120**	**0.500**	**mg/L**	1	14-Aug-2025 15:36
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**182**		**1.00**	**2.50**	**mg/L**	5	11-Aug-2025 13:15
Sulfate	**100.0**		**1.00**	**2.50**	**mg/L**	5	11-Aug-2025 13:15
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**764**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

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Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-47		Lab ID:HS25080440-13
Collection Date:	08-Aug-2025 10:50		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.293**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:38
Calcium	**146**		**0.120**	**0.500**	**mg/L**	1	14-Aug-2025 15:38
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**360**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 13:21
Sulfate	**79.6**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 13:21
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,150**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-48		Lab ID:HS25080440-14
Collection Date:	08-Aug-2025 10:15		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.545**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:40
Calcium	**70.3**		**0.120**	**0.500**	**mg/L**	1	14-Aug-2025 15:40
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**389**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 13:27
Sulfate	**93.5**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 13:27
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,160**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-50		Lab ID:HS25080440-15
Collection Date:	08-Aug-2025 08:40		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.236**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:42
Calcium	**118**		**0.120**	**0.500**	**mg/L**	1	14-Aug-2025 15:42
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**393**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 13:32
Sulfate	**139**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 13:32
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,220**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-52		Lab ID:HS25080440-16
Collection Date:	08-Aug-2025 09:20		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: JC
Boron	**0.333**		**0.00800**	**0.0500**	**mg/L**	1	14-Aug-2025 15:44
Calcium	**224**		**2.40**	**10.0**	**mg/L**	20	14-Aug-2025 16:16
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**508**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 14:02
Sulfate	**425**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 14:02
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,970**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Confidential

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-54		Lab ID:HS25080440-17
Collection Date:	08-Aug-2025 08:25		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 15-Aug-2025		Analyst: JC
Boron	**0.257**		**0.00800**	**0.0500**	**mg/L**	1	15-Aug-2025 13:51
Calcium	**106**		**0.120**	**0.500**	**mg/L**	1	15-Aug-2025 13:51
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**260**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 14:07
Sulfate	**100**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 14:07
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,060**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Confidential

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-55R		Lab ID:HS25080440-18
Collection Date:	08-Aug-2025 09:00		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 15-Aug-2025		Analyst: JC
Boron	**0.444**		**0.00800**	**0.0500**	**mg/L**	1	15-Aug-2025 13:53
Calcium	**109**		**0.120**	**0.500**	**mg/L**	1	15-Aug-2025 13:53
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**314**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 14:13
Sulfate	**93.2**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 14:13
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**992**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-58		Lab ID:HS25080440-19
Collection Date:	08-Aug-2025 09:40		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 15-Aug-2025		Analyst: JC
Boron	**1.29**		**0.0800**	**0.500**	**mg/L**	10	15-Aug-2025 15:04
Calcium	**158**		**0.120**	**0.500**	**mg/L**	1	15-Aug-2025 13:31
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**270**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 14:19
Sulfate	**409**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 14:19
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,380**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-65		Lab ID:HS25080440-20
Collection Date:	08-Aug-2025 09:35		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 15-Aug-2025		Analyst: JC
Boron	**0.306**		**0.00800**	**0.0500**	**mg/L**	1	15-Aug-2025 13:55
Calcium	**204**		**2.40**	**10.0**	**mg/L**	20	15-Aug-2025 15:03
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**339**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 14:25
Sulfate	**551**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 14:25
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,860**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-36		Lab ID:HS25080440-21
Collection Date:	08-Aug-2025 09:05		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 15-Aug-2025		Analyst: JC
Boron	**0.0688**		**0.00800**	**0.0500**	**mg/L**	1	15-Aug-2025 13:57
Calcium	**229**		**2.40**	**10.0**	**mg/L**	20	15-Aug-2025 15:10
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**299**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 15:23
Sulfate	**410**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 15:23
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,470**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-37		Lab ID:HS25080440-22
Collection Date:	08-Aug-2025 11:30		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: MSC
Boron	**0.517**		**0.0400**	**0.250**	**mg/L**	5	15-Aug-2025 12:18
Calcium	**280**		**0.600**	**2.50**	**mg/L**	5	15-Aug-2025 12:18
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**215**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 15:29
Sulfate	**1,280**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 15:29
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**2,620**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 08:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Confidential

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-38R		Lab ID:HS25080440-23
Collection Date:	08-Aug-2025 10:55		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: MSC
Boron	**0.454**		**0.0400**	**0.250**	**mg/L**	5	15-Aug-2025 12:21
Calcium	**244**		**0.600**	**2.50**	**mg/L**	5	15-Aug-2025 12:21
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**255**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 15:35
Sulfate	**756**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 15:35
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**2,110**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 09:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Confidential

Client:	TRC	ANALYTICAL REPORT
Project:	WA Parish CCR Program	WorkOrder:HS25080440
Sample ID:	MW-60	Lab ID:HS25080440-24
Collection Date:	08-Aug-2025 08:20	Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: MSC
Boron	**0.0866**		**0.00800**	**0.0500**	**mg/L**	1	15-Aug-2025 12:48
Calcium	**205**		**0.600**	**2.50**	**mg/L**	5	15-Aug-2025 12:23
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**297**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 15:41
Sulfate	**312**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 15:41
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,340**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 09:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	MW-61R		Lab ID:HS25080440-25
Collection Date:	08-Aug-2025 09:55		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: MSC
Boron	**0.0777**		**0.00800**	**0.0500**	**mg/L**	1	15-Aug-2025 12:50
Calcium	**165**		**0.600**	**2.50**	**mg/L**	5	15-Aug-2025 12:25
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**309**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 15:47
Sulfate	**700**		**4.00**	**10.0**	**mg/L**	20	11-Aug-2025 15:47
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,980**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 09:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	Field Blank-01		Lab ID:HS25080440-26
Collection Date:	08-Aug-2025 10:10		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: MSC
Boron	**0.0101**	J	**0.00800**	**0.0500**	**mg/L**	1	15-Aug-2025 13:08
Calcium	< 0.120		0.120	0.500	mg/L	1	15-Aug-2025 13:08
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**0.373**	J	**0.200**	**0.500**	**mg/L**	1	11-Aug-2025 15:53
Sulfate	**0.504**		**0.200**	**0.500**	**mg/L**	1	11-Aug-2025 15:53
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	< 3.00		3.00	10.0	mg/L	1	11-Aug-2025 09:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Confidential

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	Field Duplicate 1		Lab ID:HS25080440-27
Collection Date:	08-Aug-2025 11:00		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: MSC
Boron	**0.0674**		**0.00800**	**0.0500**	**mg/L**	1	15-Aug-2025 12:56
Calcium	**208**		**0.600**	**2.50**	**mg/L**	5	15-Aug-2025 12:30
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**304**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 15:58
Sulfate	**404**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 15:58
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**1,320**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 09:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Client:	TRC		**ANALYTICAL REPORT**
Project:	WA Parish CCR Program		WorkOrder:HS25080440
Sample ID:	Field Duplicate 2		Lab ID:HS25080440-28
Collection Date:	08-Aug-2025 09:00		Matrix:Water

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 14-Aug-2025		Analyst: MSC
Boron	**0.191**		**0.00800**	**0.0500**	**mg/L**	1	15-Aug-2025 12:58
Calcium	**99.6**		**0.600**	**2.50**	**mg/L**	5	15-Aug-2025 12:32
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: TH
Chloride	**209**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 16:04
Sulfate	**81.3**		**2.00**	**5.00**	**mg/L**	10	11-Aug-2025 16:04
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: HB
Total Dissolved Solids (Residue, Filterable)	**836**		**3.00**	**10.0**	**mg/L**	1	11-Aug-2025 09:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	18-Aug-2025 12:40

Note: See Qualifiers Page for a list of qualifiers and their explanation. **Revision:** 1

Weight / Prep Log

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

Batch ID: 231672 **Start Date:** 14 Aug 2025 10:00 **End Date:** 14 Aug 2025 10:00
Method: WATER - SW3010A **Prep Code:** 3010A

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS25080440-01		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-02		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-03		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-04		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-05		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-06		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-07		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-08		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-09		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-10		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-11		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-12		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-13		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-14		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-15		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-16		10 (mL)	10 (mL)	1	120 plastic HNO3

Batch ID: 231673 **Start Date:** 14 Aug 2025 15:30 **End Date:** 14 Aug 2025 15:30
Method: WATER - SW3010A **Prep Code:** 3010A

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS25080440-22		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-23		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-24		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-25		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-26		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-27		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-28		10 (mL)	10 (mL)	1	120 plastic HNO3

Batch ID: 231714 **Start Date:** 15 Aug 2025 08:30 **End Date:** 15 Aug 2025 08:30
Method: WATER - SW3010A **Prep Code:** 3010A

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS25080440-17		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-18		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-19		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-20		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25080440-21		10 (mL)	10 (mL)	1	120 plastic HNO3

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: 231672 (0)	**Test Name :** ICP-MS METALS BY SW6020A				**Matrix:** Water	
HS25080440-01	MW-39R	08 Aug 2025 08:35		14 Aug 2025 10:00	14 Aug 2025 16:00	20
HS25080440-01	MW-39R	08 Aug 2025 08:35		14 Aug 2025 10:00	14 Aug 2025 14:46	1
HS25080440-02	MW-40	08 Aug 2025 09:55		14 Aug 2025 10:00	14 Aug 2025 16:08	20
HS25080440-02	MW-40	08 Aug 2025 09:55		14 Aug 2025 10:00	14 Aug 2025 15:10	1
HS25080440-03	MW-41	08 Aug 2025 11:10		14 Aug 2025 10:00	14 Aug 2025 15:12	1
HS25080440-04	MW-62	08 Aug 2025 09:15		14 Aug 2025 10:00	14 Aug 2025 16:10	20
HS25080440-04	MW-62	08 Aug 2025 09:15		14 Aug 2025 10:00	14 Aug 2025 15:14	1
HS25080440-05	MW-63	08 Aug 2025 11:50		14 Aug 2025 10:00	14 Aug 2025 16:02	20
HS25080440-05	MW-63	08 Aug 2025 11:50		14 Aug 2025 10:00	14 Aug 2025 14:38	1
HS25080440-06	MW-64	08 Aug 2025 10:35		14 Aug 2025 10:00	14 Aug 2025 16:12	20
HS25080440-06	MW-64	08 Aug 2025 10:35		14 Aug 2025 10:00	14 Aug 2025 15:16	1
HS25080440-07	MW-23R	08 Aug 2025 11:45		14 Aug 2025 10:00	14 Aug 2025 16:14	20
HS25080440-07	MW-23R	08 Aug 2025 11:45		14 Aug 2025 10:00	14 Aug 2025 15:18	1
HS25080440-08	MW-28D	08 Aug 2025 09:50		14 Aug 2025 10:00	14 Aug 2025 15:28	1
HS25080440-09	MW-42	08 Aug 2025 10:25		14 Aug 2025 10:00	14 Aug 2025 15:30	1
HS25080440-10	MW-43	08 Aug 2025 12:25		14 Aug 2025 10:00	14 Aug 2025 15:32	1
HS25080440-11	MW-44	08 Aug 2025 08:55		14 Aug 2025 10:00	14 Aug 2025 15:34	1
HS25080440-12	MW-46R	08 Aug 2025 08:05		14 Aug 2025 10:00	14 Aug 2025 15:36	1
HS25080440-13	MW-47	08 Aug 2025 10:50		14 Aug 2025 10:00	14 Aug 2025 15:38	1
HS25080440-14	MW-48	08 Aug 2025 10:15		14 Aug 2025 10:00	14 Aug 2025 15:40	1
HS25080440-15	MW-50	08 Aug 2025 08:40		14 Aug 2025 10:00	14 Aug 2025 15:42	1
HS25080440-16	MW-52	08 Aug 2025 09:20		14 Aug 2025 10:00	14 Aug 2025 16:16	20
HS25080440-16	MW-52	08 Aug 2025 09:20		14 Aug 2025 10:00	14 Aug 2025 15:44	1
Batch ID: 231673 (0)	**Test Name :** ICP-MS METALS BY SW6020A				**Matrix:** Water	
HS25080440-22	MW-37	08 Aug 2025 11:30		14 Aug 2025 15:30	15 Aug 2025 12:18	5
HS25080440-23	MW-38R	08 Aug 2025 10:55		14 Aug 2025 15:30	15 Aug 2025 12:21	5
HS25080440-24	MW-60	08 Aug 2025 08:20		14 Aug 2025 15:30	15 Aug 2025 12:48	1
HS25080440-24	MW-60	08 Aug 2025 08:20		14 Aug 2025 15:30	15 Aug 2025 12:23	5
HS25080440-25	MW-61R	08 Aug 2025 09:55		14 Aug 2025 15:30	15 Aug 2025 12:50	1
HS25080440-25	MW-61R	08 Aug 2025 09:55		14 Aug 2025 15:30	15 Aug 2025 12:25	5
HS25080440-26	Field Blank-01	08 Aug 2025 10:10		14 Aug 2025 15:30	15 Aug 2025 13:08	1
HS25080440-27	Field Duplicate 1	08 Aug 2025 11:00		14 Aug 2025 15:30	15 Aug 2025 12:56	1
HS25080440-27	Field Duplicate 1	08 Aug 2025 11:00		14 Aug 2025 15:30	15 Aug 2025 12:30	5
HS25080440-28	Field Duplicate 2	08 Aug 2025 09:00		14 Aug 2025 15:30	15 Aug 2025 12:58	1
HS25080440-28	Field Duplicate 2	08 Aug 2025 09:00		14 Aug 2025 15:30	15 Aug 2025 12:32	5

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: 231714 (0)	**Test Name :** ICP-MS METALS BY SW6020A				**Matrix:** Water	
HS25080440-17	MW-54	08 Aug 2025 08:25		15 Aug 2025 08:30	15 Aug 2025 13:51	1
HS25080440-18	MW-55R	08 Aug 2025 09:00		15 Aug 2025 08:30	15 Aug 2025 13:53	1
HS25080440-19	MW-58	08 Aug 2025 09:40		15 Aug 2025 08:30	15 Aug 2025 15:04	10
HS25080440-19	MW-58	08 Aug 2025 09:40		15 Aug 2025 08:30	15 Aug 2025 13:31	1
HS25080440-20	MW-65	08 Aug 2025 09:35		15 Aug 2025 08:30	15 Aug 2025 15:03	20
HS25080440-20	MW-65	08 Aug 2025 09:35		15 Aug 2025 08:30	15 Aug 2025 13:55	1
HS25080440-21	MW-36	08 Aug 2025 09:05		15 Aug 2025 08:30	15 Aug 2025 15:10	20
HS25080440-21	MW-36	08 Aug 2025 09:05		15 Aug 2025 08:30	15 Aug 2025 13:57	1
Batch ID: R519447 (0)	**Test Name :** TOTAL DISSOLVED SOLIDS BY SM2540C				**Matrix:** Water	
HS25080440-01	MW-39R	08 Aug 2025 08:35			11 Aug 2025 07:30	1
HS25080440-02	MW-40	08 Aug 2025 09:55			11 Aug 2025 07:30	1
Batch ID: R519448 (0)	**Test Name :** TOTAL DISSOLVED SOLIDS BY SM2540C				**Matrix:** Water	
HS25080440-03	MW-41	08 Aug 2025 11:10			11 Aug 2025 08:30	1
HS25080440-04	MW-62	08 Aug 2025 09:15			11 Aug 2025 08:30	1
HS25080440-05	MW-63	08 Aug 2025 11:50			11 Aug 2025 08:30	1
HS25080440-06	MW-64	08 Aug 2025 10:35			11 Aug 2025 08:30	1
HS25080440-07	MW-23R	08 Aug 2025 11:45			11 Aug 2025 08:30	1
HS25080440-08	MW-28D	08 Aug 2025 09:50			11 Aug 2025 08:30	1
HS25080440-09	MW-42	08 Aug 2025 10:25			11 Aug 2025 08:30	1
HS25080440-10	MW-43	08 Aug 2025 12:25			11 Aug 2025 08:30	1
HS25080440-11	MW-44	08 Aug 2025 08:55			11 Aug 2025 08:30	1
HS25080440-12	MW-46R	08 Aug 2025 08:05			11 Aug 2025 08:30	1
HS25080440-13	MW-47	08 Aug 2025 10:50			11 Aug 2025 08:30	1
HS25080440-14	MW-48	08 Aug 2025 10:15			11 Aug 2025 08:30	1
HS25080440-15	MW-50	08 Aug 2025 08:40			11 Aug 2025 08:30	1
HS25080440-16	MW-52	08 Aug 2025 09:20			11 Aug 2025 08:30	1
HS25080440-17	MW-54	08 Aug 2025 08:25			11 Aug 2025 08:30	1
HS25080440-18	MW-55R	08 Aug 2025 09:00			11 Aug 2025 08:30	1
HS25080440-19	MW-58	08 Aug 2025 09:40			11 Aug 2025 08:30	1
HS25080440-20	MW-65	08 Aug 2025 09:35			11 Aug 2025 08:30	1
HS25080440-21	MW-36	08 Aug 2025 09:05			11 Aug 2025 08:30	1
HS25080440-22	MW-37	08 Aug 2025 11:30			11 Aug 2025 08:30	1

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: R519449 (0)	**Test Name :** TOTAL DISSOLVED SOLIDS BY SM2540C				**Matrix:** Water	
HS25080440-23	MW-38R	08 Aug 2025 10:55			11 Aug 2025 09:30	1
HS25080440-24	MW-60	08 Aug 2025 08:20			11 Aug 2025 09:30	1
HS25080440-25	MW-61R	08 Aug 2025 09:55			11 Aug 2025 09:30	1
HS25080440-26	Field Blank-01	08 Aug 2025 10:10			11 Aug 2025 09:30	1
HS25080440-27	Field Duplicate 1	08 Aug 2025 11:00			11 Aug 2025 09:30	1
HS25080440-28	Field Duplicate 2	08 Aug 2025 09:00			11 Aug 2025 09:30	1
Batch ID: R519463 (0)	**Test Name :** ANIONS BY E300.0, REV 2.1, 1993				**Matrix:** Water	
HS25080440-01	MW-39R	08 Aug 2025 08:35			11 Aug 2025 11:30	20
HS25080440-02	MW-40	08 Aug 2025 09:55			11 Aug 2025 11:36	10
HS25080440-03	MW-41	08 Aug 2025 11:10			11 Aug 2025 12:52	5
HS25080440-03	MW-41	08 Aug 2025 11:10			11 Aug 2025 11:41	1
HS25080440-04	MW-62	08 Aug 2025 09:15			11 Aug 2025 11:47	10
HS25080440-05	MW-63	08 Aug 2025 11:50			11 Aug 2025 11:53	20
HS25080440-06	MW-64	08 Aug 2025 10:35			11 Aug 2025 11:59	10
HS25080440-07	MW-23R	08 Aug 2025 11:45			11 Aug 2025 12:05	20
HS25080440-08	MW-28D	08 Aug 2025 09:50			11 Aug 2025 12:11	5
HS25080440-09	MW-42	08 Aug 2025 10:25			11 Aug 2025 12:40	10
HS25080440-10	MW-43	08 Aug 2025 12:25			11 Aug 2025 12:46	10
HS25080440-11	MW-44	08 Aug 2025 08:55			11 Aug 2025 13:09	5
HS25080440-12	MW-46R	08 Aug 2025 08:05			11 Aug 2025 13:15	5
HS25080440-13	MW-47	08 Aug 2025 10:50			11 Aug 2025 13:21	10
HS25080440-14	MW-48	08 Aug 2025 10:15			11 Aug 2025 13:27	10
HS25080440-15	MW-50	08 Aug 2025 08:40			11 Aug 2025 13:32	10
HS25080440-16	MW-52	08 Aug 2025 09:20			11 Aug 2025 14:02	10
HS25080440-17	MW-54	08 Aug 2025 08:25			11 Aug 2025 14:07	10
HS25080440-18	MW-55R	08 Aug 2025 09:00			11 Aug 2025 14:13	10
HS25080440-19	MW-58	08 Aug 2025 09:40			11 Aug 2025 14:19	10
HS25080440-20	MW-65	08 Aug 2025 09:35			11 Aug 2025 14:25	20
Batch ID: R519466 (0)	**Test Name :** ANIONS BY E300.0, REV 2.1, 1993				**Matrix:** Water	
HS25080440-21	MW-36	08 Aug 2025 09:05			11 Aug 2025 15:23	20
HS25080440-22	MW-37	08 Aug 2025 11:30			11 Aug 2025 15:29	20
HS25080440-23	MW-38R	08 Aug 2025 10:55			11 Aug 2025 15:35	20
HS25080440-24	MW-60	08 Aug 2025 08:20			11 Aug 2025 15:41	10
HS25080440-25	MW-61R	08 Aug 2025 09:55			11 Aug 2025 15:47	20
HS25080440-26	Field Blank-01	08 Aug 2025 10:10			11 Aug 2025 15:53	1
HS25080440-27	Field Duplicate 1	08 Aug 2025 11:00			11 Aug 2025 15:58	10
HS25080440-28	Field Duplicate 2	08 Aug 2025 09:00			11 Aug 2025 16:04	10

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: R519875 (0)	**Test Name :** SUBCONTRACT ANALYSIS - FLOURIDE				**Matrix:** Water	
HS25080440-01	MW-39R	08 Aug 2025 08:35			18 Aug 2025 12:40	1
HS25080440-02	MW-40	08 Aug 2025 09:55			18 Aug 2025 12:40	1
HS25080440-03	MW-41	08 Aug 2025 11:10			18 Aug 2025 12:40	1
HS25080440-04	MW-62	08 Aug 2025 09:15			18 Aug 2025 12:40	1
HS25080440-05	MW-63	08 Aug 2025 11:50			18 Aug 2025 12:40	1
HS25080440-06	MW-64	08 Aug 2025 10:35			18 Aug 2025 12:40	1
HS25080440-07	MW-23R	08 Aug 2025 11:45			18 Aug 2025 12:40	1
HS25080440-08	MW-28D	08 Aug 2025 09:50			18 Aug 2025 12:40	1
HS25080440-09	MW-42	08 Aug 2025 10:25			18 Aug 2025 12:40	1
HS25080440-10	MW-43	08 Aug 2025 12:25			18 Aug 2025 12:40	1
HS25080440-11	MW-44	08 Aug 2025 08:55			18 Aug 2025 12:40	1
HS25080440-12	MW-46R	08 Aug 2025 08:05			18 Aug 2025 12:40	1
HS25080440-13	MW-47	08 Aug 2025 10:50			18 Aug 2025 12:40	1
HS25080440-14	MW-48	08 Aug 2025 10:15			18 Aug 2025 12:40	1
HS25080440-15	MW-50	08 Aug 2025 08:40			18 Aug 2025 12:40	1
HS25080440-16	MW-52	08 Aug 2025 09:20			18 Aug 2025 12:40	1
HS25080440-17	MW-54	08 Aug 2025 08:25			18 Aug 2025 12:40	1
HS25080440-18	MW-55R	08 Aug 2025 09:00			18 Aug 2025 12:40	1
HS25080440-19	MW-58	08 Aug 2025 09:40			18 Aug 2025 12:40	1
HS25080440-20	MW-65	08 Aug 2025 09:35			18 Aug 2025 12:40	1
HS25080440-21	MW-36	08 Aug 2025 09:05			18 Aug 2025 12:40	1
HS25080440-22	MW-37	08 Aug 2025 11:30			18 Aug 2025 12:40	1
HS25080440-23	MW-38R	08 Aug 2025 10:55			18 Aug 2025 12:40	1
HS25080440-24	MW-60	08 Aug 2025 08:20			18 Aug 2025 12:40	1
HS25080440-25	MW-61R	08 Aug 2025 09:55			18 Aug 2025 12:40	1
HS25080440-26	Field Blank-01	08 Aug 2025 10:10			18 Aug 2025 12:40	1
HS25080440-27	Field Duplicate 1	08 Aug 2025 11:00			18 Aug 2025 12:40	1
HS25080440-28	Field Duplicate 2	08 Aug 2025 09:00			18 Aug 2025 12:40	1

WorkOrder: HS25080440
InstrumentID: ICPMS06
Test Code: ICP_TW
Test Number: SW6020A
Test Name: ICP-MS Metals by SW6020A

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Boron	7440-42-8	0.0250	0.0217	0.00800	0.0500
A	Calcium	7440-70-2	0.250	0.241	0.120	0.500

WorkOrder: HS25080440
InstrumentID: ICPMS07
Test Code: ICP_TW
Test Number: SW6020A
Test Name: ICP-MS Metals by SW6020A

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Boron	7440-42-8	0.0250	0.0229	0.00800	0.0500
A	Calcium	7440-70-2	0.250	0.244	0.120	0.500

WorkOrder:	HS25080440
InstrumentID:	Subcontract
Test Code:	Sub_Flouride
Test Number:	NA
Test Name:	Subcontract Analysis - Flouride

METHOD DETECTION / REPORTING LIMITS

Matrix:

Units:

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Subcontract Analysis		0	0	0	0

Revision: 1

WorkOrder:	HS25080440
InstrumentID:	ICS-Integrion
Test Code:	300_W
Test Number:	E300
Test Name:	Anions by E300.0, Rev 2.1, 1993

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Chloride	16887-00-6	0.250	0.389	0.200	0.500
A	Sulfate	14808-79-8	0.250	0.328	0.200	0.500

WorkOrder:	HS25080440
InstrumentID:	Balance1
Test Code:	TDS_W 2540C
Test Number:	M2540C
Test Name:	Total Dissolved Solids by SM2540C

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Total Dissolved Solids (Residue, Filterable)	TDS	6.00	6.00	3.00	10.0

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: 231672 (0) **Instrument:** ICPMS06 **Method:** ICP-MS METALS BY SW6020A

MBLK Sample ID: **MBLK-231672** Units: **mg/L** Analysis Date: **14-Aug-2025 14:30**
Client ID: Run ID: **ICPMS06_519680** SeqNo: **8986716** PrepDate: **14-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	< 0.00800	0.0500								
Calcium	< 0.120	0.500								

LCS Sample ID: **LCS-231672** Units: **mg/L** Analysis Date: **14-Aug-2025 14:32**
Client ID: Run ID: **ICPMS06_519680** SeqNo: **8986717** PrepDate: **14-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.4765	0.0500	0.5	0	95.3	80 - 120				
Calcium	4.818	0.500	5	0	96.4	80 - 120				

MS Sample ID: **HS25080440-05MS** Units: **mg/L** Analysis Date: **14-Aug-2025 14:41**
Client ID: **MW-63** Run ID: **ICPMS06_519680** SeqNo: **8986721** PrepDate: **14-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.7772	0.0500	0.5	0.2827	98.9	80 - 120				
Calcium	252.5	0.500	5	247.1	108	80 - 120				EO

MSD Sample ID: **HS25080440-05MSD** Units: **mg/L** Analysis Date: **14-Aug-2025 14:43**
Client ID: **MW-63** Run ID: **ICPMS06_519680** SeqNo: **8986722** PrepDate: **14-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.7731	0.0500	0.5	0.2827	98.1	80 - 120	0.7772	0.525	20	
Calcium	250.6	0.500	5	247.1	69.4	80 - 120	252.5	0.764	20	SEO

PDS Sample ID: **HS25080440-05PDS** Units: **mg/L** Analysis Date: **14-Aug-2025 14:45**
Client ID: **MW-63** Run ID: **ICPMS06_519680** SeqNo: **8986723** PrepDate: **14-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.7891	0.0500	0.5	0.2827	101	75 - 125				

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: 231672 (0) **Instrument:** ICPMS06 **Method:** ICP-MS METALS BY SW6020A

PDS Sample ID: **HS25080440-05PDS** Units: **mg/L** Analysis Date: **14-Aug-2025 16:06**
Client ID: **MW-63** Run ID: **ICPMS06_519680** SeqNo: **8986915** PrepDate: **14-Aug-2025** DF: **20**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Calcium	446.3	10.0	200	244.3	101	75 - 125				

SD Sample ID: **HS25080440-05SD** Units: **mg/L** Analysis Date: **14-Aug-2025 14:34**
Client ID: **MW-63** Run ID: **ICPMS06_519680** SeqNo: **8986718** PrepDate: **14-Aug-2025** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Boron	0.3015	0.250					0.2827	6.67	10	

SD Sample ID: **HS25080440-05SD** Units: **mg/L** Analysis Date: **14-Aug-2025 16:04**
Client ID: **MW-63** Run ID: **ICPMS06_519680** SeqNo: **8986914** PrepDate: **14-Aug-2025** DF: **100**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Calcium	249	50.0					244.3	1.91	10	

The following samples were analyzed in this batch:

HS25080440-01	HS25080440-02	HS25080440-03	HS25080440-04
HS25080440-05	HS25080440-06	HS25080440-07	HS25080440-08
HS25080440-09	HS25080440-10	HS25080440-11	HS25080440-12
HS25080440-13	HS25080440-14	HS25080440-15	HS25080440-16

ALS Houston, US Date: 30-Oct-25

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: 231673 (0) **Instrument:** ICPMS07 **Method:** ICP-MS METALS BY SW6020A

MBLK Sample ID: **MBLK-231673** Units: **mg/L** Analysis Date: **15-Aug-2025 10:34**
Client ID: Run ID: **ICPMS07_519753** SeqNo: **8987790** PrepDate: **14-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	< 0.00800	0.0500								
Calcium	< 0.120	0.500								

LCS Sample ID: **LCS-231673** Units: **mg/L** Analysis Date: **15-Aug-2025 10:48**
Client ID: Run ID: **ICPMS07_519753** SeqNo: **8987796** PrepDate: **14-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.4449	0.0500	0.5	0	89.0	80 - 120				
Calcium	4.785	0.500	5	0	95.7	80 - 120				

MS Sample ID: **HS25080442-07MS** Units: **mg/L** Analysis Date: **15-Aug-2025 10:41**
Client ID: Run ID: **ICPMS07_519753** SeqNo: **8987793** PrepDate: **14-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.8263	0.0500	0.5	0.4103	83.2	80 - 120				
Calcium	194.2	0.500	5	187.2	139	80 - 120				SEO

MSD Sample ID: **HS25080442-07MSD** Units: **mg/L** Analysis Date: **15-Aug-2025 10:43**
Client ID: Run ID: **ICPMS07_519753** SeqNo: **8987794** PrepDate: **14-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.8235	0.0500	0.5	0.4103	82.6	80 - 120	0.8263	0.341	20	
Calcium	190.7	0.500	5	187.2	70.3	80 - 120	194.2	1.79	20	SEO

PDS Sample ID: **HS25080442-07PDS** Units: **mg/L** Analysis Date: **15-Aug-2025 10:45**
Client ID: Run ID: **ICPMS07_519753** SeqNo: **8987795** PrepDate: **14-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.7974	0.0500	0.5	0.4103	77.4	75 - 125				

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: 231673 (0) **Instrument:** ICPMS07 **Method:** ICP-MS METALS BY SW6020A

PDS Sample ID: **HS25080442-07PDS** Units: **mg/L** Analysis Date: **15-Aug-2025 11:43**
Client ID: Run ID: **ICPMS07_519753** SeqNo: **8988022** PrepDate: **14-Aug-2025** DF: **20**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Calcium	381	10.0	200	198	91.5	75 - 125				

SD Sample ID: **HS25080442-07SD** Units: **mg/L** Analysis Date: **15-Aug-2025 10:36**
Client ID: Run ID: **ICPMS07_519753** SeqNo: **8987791** PrepDate: **14-Aug-2025** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Boron	0.4204	0.250					0.4103	2.44	10	

SD Sample ID: **HS25080442-07SD** Units: **mg/L** Analysis Date: **15-Aug-2025 11:47**
Client ID: Run ID: **ICPMS07_519753** SeqNo: **8988024** PrepDate: **14-Aug-2025** DF: **100**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Calcium	194.6	50.0					198	1.71	10	

The following samples were analyzed in this batch:

HS25080440-22	HS25080440-23	HS25080440-24	HS25080440-25
HS25080440-26	HS25080440-27	HS25080440-28	

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: 231714 (0) **Instrument:** ICPMS06 **Method:** ICP-MS METALS BY SW6020A

MBLK Sample ID: **MBLK-231714** Units: **mg/L** Analysis Date: **15-Aug-2025 13:23**
Client ID: Run ID: **ICPMS06_519755** SeqNo: **8988446** PrepDate: **15-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	< 0.00800	0.0500								
Calcium	< 0.120	0.500								

LCS Sample ID: **LCS-231714** Units: **mg/L** Analysis Date: **15-Aug-2025 13:25**
Client ID: Run ID: **ICPMS06_519755** SeqNo: **8988447** PrepDate: **15-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.4233	0.0500	0.5	0	84.7	80 - 120				
Calcium	4.617	0.500	5	0	92.3	80 - 120				

MS Sample ID: **HS25080440-19MS** Units: **mg/L** Analysis Date: **15-Aug-2025 13:33**
Client ID: **MW-58** Run ID: **ICPMS06_519755** SeqNo: **8988451** PrepDate: **15-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	1.762	0.0500	0.5	1.266	99.2	80 - 120				E
Calcium	159.8	0.500	5	157.8	38.7	80 - 120				SO

MSD Sample ID: **HS25080440-19MSD** Units: **mg/L** Analysis Date: **15-Aug-2025 13:35**
Client ID: **MW-58** Run ID: **ICPMS06_519755** SeqNo: **8988452** PrepDate: **15-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	1.803	0.0500	0.5	1.266	107	80 - 120	1.762	2.31	20	E
Calcium	166.3	0.500	5	157.8	170	80 - 120	159.8	4.03	20	SO

PDS Sample ID: **HS25080440-19PDS** Units: **mg/L** Analysis Date: **15-Aug-2025 15:22**
Client ID: **MW-58** Run ID: **ICPMS06_519755** SeqNo: **8988730** PrepDate: **15-Aug-2025** DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	5.863	0.500	5	1.29	91.5	75 - 125				

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: 231714 (0) **Instrument:** ICPMS06 **Method:** ICP-MS METALS BY SW6020A

PDS Sample ID: **HS25080440-19PDS** Units: **mg/L** Analysis Date: **15-Aug-2025 13:37**
Client ID: **MW-58** Run ID: **ICPMS06_519755** SeqNo: **8988453** PrepDate: **15-Aug-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Calcium	166	0.500	10	157.8	81.6	75 - 125				O

SD Sample ID: **HS25080440-19SD** Units: **mg/L** Analysis Date: **15-Aug-2025 15:06**
Client ID: **MW-58** Run ID: **ICPMS06_519755** SeqNo: **8988714** PrepDate: **15-Aug-2025** DF: **50**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Boron	1.463	2.50					1.29	0	10	J

SD Sample ID: **HS25080440-19SD** Units: **mg/L** Analysis Date: **15-Aug-2025 13:27**
Client ID: **MW-58** Run ID: **ICPMS06_519755** SeqNo: **8988448** PrepDate: **15-Aug-2025** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Calcium	162.5	2.50					157.8	2.94	10	

The following samples were analyzed in this batch: HS25080440-17 HS25080440-18 HS25080440-19 HS25080440-20 HS25080440-21

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: R519447 (0) **Instrument:** Balance1 **Method:** TOTAL DISSOLVED SOLIDS BY SM2540C

MBLK Sample ID: **WMBLK-08112025** Units: **mg/L** Analysis Date: **11-Aug-2025 07:30**
Client ID: Run ID: **Balance1_519447** SeqNo: **8980414** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	< 3.00	10.0								

LCS Sample ID: **WLCS-08112025** Units: **mg/L** Analysis Date: **11-Aug-2025 07:30**
Client ID: Run ID: **Balance1_519447** SeqNo: **8980413** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1000	10.0	1000	0	100	85 - 115				

DUP Sample ID: **HS25080420-01DUP** Units: **mg/L** Analysis Date: **11-Aug-2025 07:30**
Client ID: Run ID: **Balance1_519447** SeqNo: **8980406** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	21260	10.0					21140	0.566	20	

DUP Sample ID: **HS25080417-04DUP** Units: **mg/L** Analysis Date: **11-Aug-2025 07:30**
Client ID: Run ID: **Balance1_519447** SeqNo: **8980396** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	620	10.0					658	5.95	20	

The following samples were analyzed in this batch: HS25080440-01 HS25080440-02

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: R519448 (0) **Instrument:** Balance1 **Method:** TOTAL DISSOLVED SOLIDS BY SM2540C

MBLK Sample ID: **WMBLK-08112025** Units: **mg/L** Analysis Date: **11-Aug-2025 08:30**
Client ID: Run ID: **Balance1_519448** SeqNo: **8980438** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	< 3.00	10.0								

LCS Sample ID: **WLCS-08112025** Units: **mg/L** Analysis Date: **11-Aug-2025 08:30**
Client ID: Run ID: **Balance1_519448** SeqNo: **8980437** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	988	10.0	1000	0	98.8	85 - 115				

DUP Sample ID: **HS25080440-19DUP** Units: **mg/L** Analysis Date: **11-Aug-2025 08:30**
Client ID: **MW-58** Run ID: **Balance1_519448** SeqNo: **8980433** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1396	10.0					1376	1.44	20	

DUP Sample ID: **HS25080440-05DUP** Units: **mg/L** Analysis Date: **11-Aug-2025 08:30**
Client ID: **MW-63** Run ID: **Balance1_519448** SeqNo: **8980418** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1368	10.0					1380	0.873	20	

The following samples were analyzed in this batch:

HS25080440-03	HS25080440-04	HS25080440-05	HS25080440-06
HS25080440-07	HS25080440-08	HS25080440-09	HS25080440-10
HS25080440-11	HS25080440-12	HS25080440-13	HS25080440-14
HS25080440-15	HS25080440-16	HS25080440-17	HS25080440-18
HS25080440-19	HS25080440-20	HS25080440-21	HS25080440-22

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: R519449 (0) **Instrument:** Balance1 **Method:** TOTAL DISSOLVED SOLIDS BY SM2540C

MBLK Sample ID: **WMBLK-08112025** Units: **mg/L** Analysis Date: **11-Aug-2025 09:30**
Client ID: Run ID: **Balance1_519449** SeqNo: **8980462** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	< 3.00	10.0								

LCS Sample ID: **WLCS-08112025** Units: **mg/L** Analysis Date: **11-Aug-2025 09:30**
Client ID: Run ID: **Balance1_519449** SeqNo: **8980461** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1044	10.0	1000	0	104	85 - 115				

DUP Sample ID: **HS25080442-07DUP** Units: **mg/L** Analysis Date: **11-Aug-2025 09:30**
Client ID: Run ID: **Balance1_519449** SeqNo: **8980453** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1504	10.0					1420	5.75	20	

DUP Sample ID: **HS25080442-02DUP** Units: **mg/L** Analysis Date: **11-Aug-2025 09:30**
Client ID: Run ID: **Balance1_519449** SeqNo: **8980447** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	5580	10.0					5440	2.54	20	

The following samples were analyzed in this batch:

HS25080440-23	HS25080440-24	HS25080440-25	HS25080440-26
HS25080440-27	HS25080440-28		

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: R519463 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY E300.0, REV 2.1, 1993

MBLK Sample ID: **MBLK** Units: **mg/L** Analysis Date: **11-Aug-2025 11:12**
Client ID: Run ID: **ICS-Integrion_519463** SeqNo: **8980809** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	< 0.200	0.500								
Sulfate	< 0.200	0.500								

LCS Sample ID: **LCS** Units: **mg/L** Analysis Date: **11-Aug-2025 11:24**
Client ID: Run ID: **ICS-Integrion_519463** SeqNo: **8980810** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	20.22	0.500	20	0	101	90 - 110				
Sulfate	20.4	0.500	20	0	102	90 - 110				

MS Sample ID: **HS25080440-19MS** Units: **mg/L** Analysis Date: **11-Aug-2025 14:31**
Client ID: **MW-58** Run ID: **ICS-Integrion_519463** SeqNo: **8980838** PrepDate: DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	362.4	5.00	100	270	92.4	80 - 120				
Sulfate	488.1	5.00	100	409	79.1	80 - 120				SO

MS Sample ID: **HS25080440-05MS** Units: **mg/L** Analysis Date: **11-Aug-2025 12:57**
Client ID: **MW-63** Run ID: **ICS-Integrion_519463** SeqNo: **8980824** PrepDate: DF: **20**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	421.2	10.0	200	236.8	92.2	80 - 120				
Sulfate	721	10.0	200	566.4	77.3	80 - 120				S

MSD Sample ID: **HS25080440-19MSD** Units: **mg/L** Analysis Date: **11-Aug-2025 14:37**
Client ID: **MW-58** Run ID: **ICS-Integrion_519463** SeqNo: **8980839** PrepDate: DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	363.4	5.00	100	270	93.3	80 - 120	362.4	0.27	20	
Sulfate	488.6	5.00	100	409	79.7	80 - 120	488.1	0.117	20	SO

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: R519463 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY E300.0, REV 2.1, 1993

MSD Sample ID: **HS25080440-05MSD** Units: **mg/L** Analysis Date: **11-Aug-2025 13:03**

Client ID: **MW-63** Run ID: **ICS-Integrion_519463** SeqNo: **8980825** PrepDate: DF: **20**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	422.1	10.0	200	236.8	92.6	80 - 120	421.2	0.204	20	
Sulfate	720.3	10.0	200	566.4	77.0	80 - 120	721	0.101	20	S

The following samples were analyzed in this batch:

HS25080440-01	HS25080440-02	HS25080440-03	HS25080440-04
HS25080440-05	HS25080440-06	HS25080440-07	HS25080440-08
HS25080440-09	HS25080440-10	HS25080440-11	HS25080440-12
HS25080440-13	HS25080440-14	HS25080440-15	HS25080440-16
HS25080440-17	HS25080440-18	HS25080440-19	HS25080440-20

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: R519466 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY E300.0, REV 2.1, 1993

MBLK Sample ID: **MBLK** Units: **mg/L** Analysis Date: **11-Aug-2025 15:06**
Client ID: Run ID: **ICS-Integrion_519466** SeqNo: **8980874** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	< 0.200	0.500								
Sulfate	< 0.200	0.500								

LCS Sample ID: **LCS** Units: **mg/L** Analysis Date: **11-Aug-2025 15:18**
Client ID: Run ID: **ICS-Integrion_519466** SeqNo: **8980875** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	20.29	0.500	20	0	101	90 - 110				
Sulfate	20.54	0.500	20	0	103	90 - 110				

MS Sample ID: **HS25080442-07MS** Units: **mg/L** Analysis Date: **11-Aug-2025 18:30**
Client ID: Run ID: **ICS-Integrion_519466** SeqNo: **8980904** PrepDate: DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	491.3	5.00	100	401.5	89.8	80 - 120				O
Sulfate	186.4	5.00	100	91.81	94.6	80 - 120				

MS Sample ID: **HS25080442-02MS** Units: **mg/L** Analysis Date: **11-Aug-2025 17:20**
Client ID: Run ID: **ICS-Integrion_519466** SeqNo: **8980894** PrepDate: DF: **50**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	1529	25.0	500	1051	95.7	80 - 120				
Sulfate	2878	25.0	500	2565	62.8	80 - 120				SO

MS Sample ID: **HS25080421-01MS** Units: **mg/L** Analysis Date: **11-Aug-2025 16:51**
Client ID: Run ID: **ICS-Integrion_519466** SeqNo: **8980889** PrepDate: DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	541	5.00	100	449.1	91.9	80 - 120				O
Sulfate	940.6	5.00	100	899.8	40.8	80 - 120				SO

Client: TRC
Project: WA Parish CCR Program
WorkOrder: HS25080440

QC BATCH REPORT

Batch ID: **R519466 (0)** **Instrument:** **ICS-Integrion** **Method:** **ANIONS BY E300.0, REV 2.1, 1993**

MSD Sample ID: **HS25080442-07MSD** Units: **mg/L** Analysis Date: **11-Aug-2025 18:36**
Client ID: Run ID: **ICS-Integrion_519466** SeqNo: **8980905** PrepDate: DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	490.9	5.00	100	401.5	89.4	80 - 120	491.3	0.0814	20	O
Sulfate	185.6	5.00	100	91.81	93.7	80 - 120	186.4	0.468	20	

MSD Sample ID: **HS25080442-02MSD** Units: **mg/L** Analysis Date: **11-Aug-2025 17:26**
Client ID: Run ID: **ICS-Integrion_519466** SeqNo: **8980895** PrepDate: DF: **50**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	1530	25.0	500	1051	95.8	80 - 120	1529	0.0229	20	
Sulfate	2870	25.0	500	2565	61.0	80 - 120	2878	0.304	20	SO

MSD Sample ID: **HS25080421-01MSD** Units: **mg/L** Analysis Date: **11-Aug-2025 16:57**
Client ID: Run ID: **ICS-Integrion_519466** SeqNo: **8980890** PrepDate: DF: **10**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	542.4	5.00	100	449.1	93.3	80 - 120	541	0.264	20	O
Sulfate	940.6	5.00	100	899.8	40.8	80 - 120	940.6	0.00266	20	SO

The following samples were analyzed in this batch:

HS25080440-21	HS25080440-22	HS25080440-23	HS25080440-24
HS25080440-25	HS25080440-26	HS25080440-27	HS25080440-28

Client:	TRC	**QUALIFIERS, ACRONYMS, UNITS**
Project:	WA Parish CCR Program	
WorkOrder:	**HS25080440**	

Qualifier	Description
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte detected below quantitation limit
M	Manually integrated, see raw data for justification
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL/SDL

Acronym	Description
DCS	Detectability Check Study
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitaion Limit
SD	Serial Dilution
SDL	Sample Detection Limit
TRRP	Texas Risk Reduction Program

CERTIFICATIONS,ACCREDITATIONS & LICENSES

Agency	Number	Expire Date
Arizona	AZ0793	27-May-2026
Arkansas	88-00356_2024	17-Mar-2026
California	2919 - 2025	30-Apr-2026
Dept of Defense	L24-239	30-Apr-2026
Dept of Defense	L24-240	30-Apr-2026
Florida	E87611-2025	30-Jun-2026
Illinois	200032 - 2025	31-Jul-2026
Kansas	KS-C25-00168	31-Jul-2026
Kentucky	123043-2025	30-Apr-2026
Louisiana	03087-2025	30-Jun-2026
Maine	2024017	23-Jun-2026
Michigan	9971-2025	30-Apr-2026
Minnesota	2856348	31-Dec-2025
Missouri	136	30-Sep-2026
Nebraska	NE-OS-25-13 - 2025	30-Apr-2026
Nevada	NV-C25-00124 - 2025	31-Jul-2026
New Hampshire	209425	24-Apr-2026
New Jersey	TX008-2025	30-Jun-2026
New York	11707 - 2025	01-Apr-2026
North Carolina	624 - 2024	31-Dec-2025
Oregon	TX200002-013	15-May-2026
Pennsylvania	019	01-Jul-2026
Tennessee	TN	30-Apr-2026
Texas	TX-C25-00104	30-Apr-2026

Sample Receipt Checklist

Work Order ID: HS25080440
Client Name: TRC-HOU

Date/Time Received: **08-Aug-2025 13:15**
Received by: **Chelsea Rogers**

Completed By:	/S/ Chelsea Rogers	09-Aug-2025 10:07	**Reviewed by:**	/S/ Beverly Mustafa	11-Aug-2025 10:24
	eSignature	Date/Time		eSignature	Date/Time

Matrices: **W**

Carrier name: **Client**

	Yes	No	
Shipping container/cooler in good condition?	☑	☐	Not Present ☐
Custody seals intact on shipping container/cooler?	☑	☐	Not Present ☐
Custody seals intact on sample bottles?	☐	☐	Not Present ☑
VOA/TX1005/TX1006 Solids in hermetically sealed vials?	☐	☐	Not Present ☑
Chain of custody present?	☑	☐	4 Page(s)
Chain of custody signed when relinquished and received?	☑	☐	COC IDs:345470, 345469, 345468, 345467
Samplers name present on COC?	☑	☐	
Chain of custody agrees with sample labels?	☑	☐	
Samples in proper container/bottle?	☑	☐	
Sample containers intact?	☑	☐	
Sufficient sample volume for indicated test?	☑	☐	
All samples received within holding time?	☑	☐	
Container/Temp Blank temperature in compliance?	☑	☐	

Temperature(s)/Thermometer(s):	5.0UC/5.0C, 4.1UC/4.1C	IR 34
Cooler(s)/Kit(s):	53246, 53332	
Date/Time sample(s) sent to storage:	08/09/2025 10:07	

	Yes	No	
Water - VOA vials have zero headspace?	☐	☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	☑	☐	N/A ☐
pH adjusted?	☐	☑	N/A ☐

pH adjusted by:

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

Corrective Action:

Chain of Custody Form

Cincinnati, OH +1 513 733 5336 | Fort Collins, CO +1 970 490 1511 | Everett, WA +1 425 356 2600 | Holland, MI +1 616 399 6070 | Houston, TX +1 281 530 5656 | Spring City, PA +1 610 948 4903 | South Charleston, WV +1 304 356 3168 | Middletown, PA +1 717 944 5541 | Salt Lake City, UT +1 801 266 7700 | York, PA +1 717 505 5280

Page 1 of 4

COC ID: 345470

ALS Project Manager: | ALS Work Order #:

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order	[illegible]	Project Name	WA Parish CCR Program	A	[illegible] Appendix III
Work Order		Project Number	[illegible]	B	[illegible] Appendix III
Company Name	[illegible]	Bill To Company	[illegible]	C	[illegible] Appendix III
Send Report To	[illegible]	Invoice Attn	[illegible]	D	[illegible] (TDS) Appendix III
Address	[illegible]	Address	[illegible]	E	
				F	
City/State/Zip	[illegible]	City/State/Zip	[illegible]	G	
Phone	[illegible]	Phone	[illegible]	H	
Fax	[illegible]	Fax	[illegible]	I	
e-Mail Address	[illegible]	e-Mail Address	[illegible]	J	

HS25080440
TRC
WA Parish CCR Program

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	MW-39R	8-8-25	835	Water	2,8	3	X	X	X	X							
2	MW-30		955	Water	2,8	3	X	X	X	X							
3	MW-41		1110	Water	2,8	3	X	X	X	X							
4	MW-62		915	Water	2,8	3	X	X	X	X							
5	MW-60		1150	Water	2,8	3	X	X	X	X							
6	MW-64		1035	Water	2,8	3	X	X	X	X							
7	MW-23R		1145	Water	2,8	3	X	X	X	X							
8	MW-28D		950	Water	2,8	3	X	X	X	X							
9	MW-42		1025	Water	2,8	3	X	X	X	X							
10	MW-43		1225	Water	2,8	3	X	X	X	X							

Sampler(s) Please Print & Sign: Brian Hillin + Hunt Team

Shipment Method: Consult. Drop off

Required Turnaround Time: (Check Box) [X]

Results Due Date:

Relinquished by:	Date:	Time:	Received by:
JACOB DUNLAP	8-8-25	1315	[signature]
Relinquished by:	Date:	Time:	Received by (Laboratory): CK
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory):

Notes: [illegible]

Cooler ID	Cooler Temp.
53246	5.0c
53332	4.1

QC Package: (Check One Box Below)

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited to the terms and conditions stated on the reverse.
3. The Chain of Custody is a legal document. All information must be completed accurately.

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Chain of Custody Form

COC ID: 345469

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ALS Project Manager:		ALS Work Order #:	

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order	[illegible]	Project Name	[illegible]	A	[illegible]
Work Order		Project Number	[illegible]	B	[illegible]
Company Name	[illegible]	Bill To Company	[illegible]	C	[illegible]
Send Report To	[illegible]	Invoice Attn	[illegible]	D	[illegible]
Address	[illegible]	Address	[illegible]	E	
				F	
City/State/Zip	[illegible]	City/State/Zip	[illegible]	G	
Phone	[illegible]	Phone	[illegible]	H	
Fax	[illegible]	Fax	[illegible]	I	
e-Mail Address	[illegible]	e-Mail Address	[illegible]	J	

HS25080440
TRC
WA Parish CCR Program

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	[illegible]	8-8-25	855	[illegible]	[illegible]	[illegible]	X	X	X	X							
2	[illegible]		805	[illegible]	[illegible]	[illegible]	X	X	X	X							
3	[illegible]		1050	[illegible]	[illegible]	[illegible]	X	X	X	X							
4	[illegible]		1015	[illegible]	[illegible]	[illegible]	X	X	X	X							
5	[illegible]		840	[illegible]	[illegible]	[illegible]	X	X	X	X							
6	[illegible]		920	[illegible]	[illegible]	[illegible]	X	X	X	X							
7	[illegible]		825	[illegible]	[illegible]	[illegible]	X	X	X	X							
8	[illegible]		900	[illegible]	[illegible]	[illegible]	X	X	X	X							
9	[illegible]		940	[illegible]	[illegible]	[illegible]	X	X	X	X							
10	[illegible]		935	[illegible]	[illegible]	[illegible]	X	X	X	X							

Sampler(s) Please Print & Sign	Shipment Method	Required Turnaround Time: (Check Box)	Results Due Date:
Brian Hillin/Hart Team	Drop off @ lab		

Relinquished by:	Date:	Time:	Received by:
JACOB DUNLAP	8-8-25	1315	[signature]
Relinquished by:	Date:	Time:	Received by (Laboratory):
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory):

Notes: [illegible]

Cooler ID	Cooler Temp.	QC Package: (Check One Box Below)
	2.9c	

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

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Chain of Custody Form

Page 3 of 4

COC ID: 345468

ALS Project Manager:		ALS Work Order #:	

Customer Information		Project Information	
Purchase Order	[illegible]	Project Name	WA Parish CCR Program
Work Order		Project Number	[illegible]
Company Name	TRC Corporation	Bill To Company	TRC
Send Report To	[illegible]	Invoice Attn	AP
Address	11757 Katy Freeway Suite 230	Address	11757 Katy Freeway Suite 850
City/State/Zip	Houston, TX 770..	City/State/Zip	Houston, TX 770..
Phone	[illegible]	Phone	[illegible]
Fax	[illegible]	Fax	(713) 244-1598
e-Mail Address	[illegible]	e-Mail Address	[illegible]

Parameter/Method Request for Analysis

A	ICP [illegible] Appendix [illegible]
B	300 [illegible] Appendix III
C	[illegible] App III
D	TDS [illegible] (TDS) [illegible]
E	
F	
G	
H	
I	
J	

HS25080440
TRC
WA Parish CCR Program

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	MW-36	8-8-25	905	Water	[illegible]	3	X	X	X	X							
2	MW-37		1130	Water	[illegible]	3	X	X	X	X							
3	MW-28R		1055	Water	[illegible]	3	X	X	X	X							
4	MW-60		820	Water	[illegible]	3	X	X	X	X							
5	MW-61R		955	Water	[illegible]	3	X	X	X	X							
6	MW-63 - MS		1150	Water	[illegible]	3	X	X	X	X							
7	MW-63 - MSD		1150	Water	[illegible]	3	X	X	X	X							
8	MW-58 - MS		940	Water	[illegible]	3	X	X	X	X							
9	MW-58 - MSD		940	Water	[illegible]	3	X	X	X	X							
10	Field Blank -01		1010	Water	[illegible]	3	X	X	X	X							

Sampler(s) Please Print & Sign	Shipment Method	Required Turnaround Time: (Check Box)	Results Due Date:
Brian Hillin/HMI Team	Drop off @ lab	☐ ☒ ☐ ☐ ☐	

Relinquished by: JACOB DUNLAP	Date: 8.8.25	Time: 1315	Received by:
Relinquished by:	Date:	Time:	Received by (Laboratory):
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory):

Notes: TRC CCR PRIVILEGED & CONFIDENTIAL

Cooler ID	Cooler Temp.	QC Package: (Check One Box Below)
	4.8c	☐ ☐ ☐ ☒ ☐

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
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Chain of Custody Form

Page 4 of 4

COC ID: 345467

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Spring City, PA +1 610 948 4903
Salt Lake City, UT +1 801 266 7700
South Charleston, WV +1 304 356 3168
York, PA +1 717 505 5280

ALS Project Manager: | ALS Work Order #:

Customer Information		Project Information	
Purchase Order	[illegible]	Project Name	WA Parish CCR Program
Work Order		Project Number	[illegible]
Company Name	TRC Corporation	Bill To Company	TRC
Send Report To	[illegible]	Invoice Attn	[illegible]
Address	[illegible] Katy Freeway Suite [illegible]	Address	[illegible] Katy Freeway Suite [illegible]
City/State/Zip	Houston, TX [illegible]	City/State/Zip	Houston, TX [illegible]
Phone	[illegible]	Phone	[illegible]
Fax	(713) 244-[illegible]	Fax	(713) 244-[illegible]
e-Mail Address	[illegible]@trcsolutions.com	e-Mail Address	[illegible]@trcsolutions.com

Parameter/Method Request for Analysis

A ICP_[illegible] App III
B [illegible] Appendix III
C Sub_Fluoride (Sub Fluoride to ALS Michigan) App III
D TDS_SM2540C (TDS) Appendix III
E
F
G
H
I
J

HS25080440
TRC
WA Parish CCR Program

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	Field Duplicate 1	8-8-25	1100	Water	[illegible]	[illegible]	X	X	X	X							
2	Field Duplicate 2	↓	900	Water	[illegible]	[illegible]	X	X	X	X							
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign: Brian Hillin / HMI Team

Shipment Method: Drop off @ lab

Required Turnaround Time: (Check Box)

Results Due Date:

Relinquished by: JACOB DUNNAND Date: 8-8-25 Time: 1315 Received by: [illegible]

Relinquished by: Date: Time: Received by (Laboratory):

Logged by (Laboratory): Date: Time: Checked by (Laboratory):

Notes: NRC: [illegible] PRIVILEGED & CONFIDENTIAL

Cooler ID	Cooler Temp.	QC Package: (Check One Box Below)
	3.0 °C	

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
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3. The Chain of Custody is a legal document. All information must be completed accurately.

ALS
10450 Stancliff Rd., Suite 210
Houston, Texas 77099
Tel. +1 281 530 5656
Fax. +1 281 530 5887

2'5

CUSTODY SEAL

Date: 8-8-25 Time: 1245
Name: B. Hillin
Company: AmF

Seal Broken By:
Date:

ALS
10450 Stancliff Rd., Suite 210
Houston, Texas 77099
Tel. +1 281 530 5656
Fax. +1 281 530 5887

CUSTODY SEAL

Date: 8-8-25 Time: 1245
Name: B. Hillin
Company: AmF

Seal Broken By:
Date:

30-Oct-2025

Andrew Neir
ALS Environmental
10450 Stancliff Rd
Suite 210
Houston, TX 77099

Re: **HS25080440** Work Order: **25080068**

Dear Andrew,

ALS Environmental received 28 samples on 12-Aug-2025 09:30 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental - Holland and for only the analyses requested.

Sample results are compliant with industry accepted practices and Quality Control results achieved laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 45.

If you have any questions regarding this report, please feel free to contact me:

ADDRESS: 3352 128th Avenue, Holland, MI, USA
PHONE: +1 (616) 399-6070 FAX: +1 (616) 399-6185

Sincerely,

Chelsey Cook

Electronically approved by: Chelsey Cook

Chelsey Cook
Project Manager

Report of Laboratory Analysis

Certificate No: TX: T104704494

ALS Group, USA

Date: *30-Oct-25*

Client:	ALS Environmental
Project:	HS25080440
Work Order:	25080068

TRRP Laboratory Data Package Cover Page

This data package consists of all or some of the following as applicable:

This signature page, the laboratory case narrative, and the following reportable data:

R1 Field chain-of-custody documentation:
R2 Sample identification cross-reference
R3 Test reports (analytical data sheets) for each environmental sample that includes:
- a) Items consistent with NELAC Chapter 5
- b) dilution factors,
- c) preparation methods,
- d) cleanup methods, and
- e) if required for the project, tentatively identified compounds (TICs).

R4 Surrogate recovery data including:
- a) Calculated recovery (%R), and
- b) The laboratory's surrogate QC limits.

R5 Test reports/summary forms for blank samples;
R6 Test reports/summary forms for laboratory control samples (LCSs) including:
- a) LCS spiking amounts,
- b) Calculated %R for each analyte, and
- c) The laboratory's LCS QC limits.

R7 Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
- a) Samples associated with the MS/MSD clearly identified,
- b) MS/MSD spiking amounts,
- c) Concentration of each MS/MSD analyte measured in the parent and spiked samples,
- d) Calculated %Rs and relative percent differences (RPDs), and
- e) The laboratory's MS/MSD QC limits

R8 Laboratory analytical duplicate (if applicable) recovery and precision:
- a) the amount of analyte measured in the duplicate,
- b) the calculated RPD, and
- c) the laboratory's QC limits for analytical duplicates.

R9 List of method quantitation limits (MQLs) for each analyte for each method and matrix;
R10 Other problems or anomalies:
See Case Narrative.

Release Statement: I am responsible for the release of this laboratory data package. This data package has been reviewed by the laboratory and is complete and technically compliant with the requirements of the methods used, except where noted by the laboratory in the attached Case Narrative and QC Summaries. By my signature below, I affirm to the best of my knowledge, all problems/anomalies, observed by the laboratory as having the potential to affect the quality of the data, have been identified, and no information affecting the quality of the data has been knowingly withheld.

Chelsey Cook

Chelsey Cook
Project Manager

WET CHEMISTRY DATA ASSESSMENT CHECKLIST

Wet Chemistry	Batch Number: TITRATOR 1_250813B	Instrument ID: TITRATOR1	
Method: FL_4500C_W	Work order Number (s): 25080068		
Analyst Name: KB	Date: 08/13/25	Reviewer Name: QN	Date: 8/14/2025

	A[1]	Description	Yes	No	NA[2]	NR[3]	ER#[4]
R1	I	Chain-of-Custody					
		1) Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?			X		
		2) Were all departures from standard conditions described in an exception report?			X		
R2	I	**SAMPLE AND QUALITY CONTROL (QC) IDENTIFICATION**					
		1) Are all field sample ID numbers cross-referenced to the laboratory ID numbers?			X		
		2) Are all laboratory ID numbers cross-referenced to the corresponding QC data?			X		
R3	I	**TEST REPORTS**					
		1) Were all samples prepared and analyzed within holding times?	X				
		2) Other than those results < MQL, were all other raw values bracketed by calibration standards?	X				
		3) Were calculations checked by a peer or supervisor?	X				
		4) Were all analyte identifications checked by a peer or supervisor?	X				
		5) Were sample quantitation limits reported for all analytes not detected?	X				
		6) Were all results for soil and sediment samples reported on a dry weight basis?			X		
		7) Was % moisture (or solids) reported for all soil and sediment samples?			X		
		8) If required for the project, TICs reported?			X		
R4	I	**SURROGATE RECOVERY DATA**					
		1) Were surrogates added prior to extraction?			X		
		2) Were surrogate percent recoveries in all samples within the laboratory QC limits?			X		
R5	I	**TEST REPORTS/SUMMMARY FORMS FOR BLANK SAMPLES**					
		1) Were appropriate type(s) of blanks analyzed?	X				
		2) Were blanks analyzed at the appropriate frequency?	X				
		3) Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X				
		4) Were blank concentrations < ½ MQL?	X				
R6	I	**LABORATORY CONTROL SAMPLES (LCS):**					
		1) Were all COCs included in the LCS?	X				
		2) Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X				
		3) Were LCSs analyzed at the required frequency?	X				
		4) Were LCS and LCSD %Rs within the laboratory QC limits?	X				
		5) Does the detectability data document the laboratory's capability to detect the COCs at the MDL used to calculate the SQLs?	X				
		6) Was the LCSD RPD within QC limits?	X				
R7	I	**MATRIX SPIKE (MS) AND MATRIX SPIKE DUPLICATE (MSD) DATA**					
		1) Were the project or method specified analytes included in the MS and MSD?	X				
		2) Were MS/MSD analyzed at the appropriate frequency?	X				
		3) Were MS and MSD %Rs within the laboratory QC limits?	X				
		4) Were MS/MSD RPDs within laboratory QC limits?	X				
R8	I	**ANALYTICAL DUPLICATE DATA (IF REQUIRED)**					
		1) Were appropriate analytical duplicates analyzed for each matrix?	X				
		2) Were analytical duplicates analyzed at the appropriate frequency?	X				
		3) Were RPDs or relative standard deviations within the laboratory QC limits?	X				
R9	I	**METHOD QUANTITATION LIMITS (MQLS):**					
		1) Are the MQLs for each method analyte listed and included in the laboratory data package?	X				
		2) Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X				
		3) Are unadjusted MQLs included in the laboratory data package?			X		
R10	I	**OTHER PROBLEMS/ANOMALIES**					
		1) Are all known problems/anomalies/special conditions noted in this LRC and ER?	X				
		2) Were all necessary corrective actions performed for the reported data?	X				
		3) If requested, is the justification for elevated SQLs documented?			X		

S1	I	**INITIAL CALIBRATION (ICAL)**					
		1) Were response factors (RFs) and/or relative response factors (RRFs) for each analyte within the QC limits?			X		
		2) Were percent RSDs or correlation coefficient criteria met?	X				
		3) Was the number of standards recommended in the method used for all analytes?	X				
		4) Were all points generated between the lowest and highest standard used to calculate the curve?	X				
		5) Are ICAL data available for all instruments used?	X				
		6) Has the initial calibration curve been verified using an appropriate second source standard?	X				
S2	I	**INITIAL AND CONTINUING CALIBRATION VERIFICATION (ICCV AND CCV) AND**					
		1) Was the CCV analyzed at the method-required frequency?	X				
		2) Were percent differences for each analyte within the method-required QC limits?	X				
		3) Was the ICAL curve verified for each analyte?	X				
		4) Was the absolute value of the analyte concentration in the organic CCB < MDL?	X				
S3	I	**MASS SPECTRAL TUNING:**					
		1) Was the appropriate compound for the method used for tuning?			X		
		2) Were ion abundance data within the method-required QC limits?			X		
S4	I	**INTERNAL STANDARDS (IS):**					
		Were IS area counts within the method-required QC limits?			X		
S5	I	**RAW DATA**					
		1) Were the raw data (e.g., chromatograms, spectral data) reviewed by an analyst?	X				
		2) Were data associated with manual integrations flagged on the raw data?	X				
S6	I	**DUAL COLUMN CONFIRMATION (IF REQUIRED)**					
		Did dual column confirmation results meet the method-required QC?			X		
S7	I	**TENTATIVELY IDENTIFIED COMPOUNDS (TICS):**					
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X		
S8	I	**INTERFERENCE CHECK SAMPLE (ICS) RESULTS:**					
		Were percent recoveries within method QC limits?			X		
S9	I	**SERIAL DILUTIONS, POST DIGESTION SPIKES, AND METHOD OF STANDARD**					
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?			X		
S10	I	**PROFICIENCY TEST REPORTS:**					
		Are proficiency testing or inter-laboratory comparison results on file?	X				
S11	I	**METHOD DETECTION LIMIT (MDL) STUDIES**					
		1) Was a MDL study performed for each reported analyte?	X				
		2) Is the MDL either adjusted or supported by the analysis of DCSs?	X				
S12	I	**STANDARDS DOCUMENTATION**					
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X				
S13	I	**COMPOUND/ANALYTE IDENTIFICATION PROCEDURES**					
		Are the procedures for compound/analyte identification documented?	X				
S14	I	**DEMONSTRATION OF ANALYST COMPETENCY (DOC)**					
		1) Was DOC conducted consistent with NELAC 5C or ISO/IEC 4.2.2?	X				
		2) Is documentation of the analyst's competency up-to-date and on file?	X				
S15	I	**VERIFICATION/VALIDATION DOCUMENTATION FOR METHODS**					
		Are all the methods used to generate the data documented, verified, and validated, where applicable, (NELAC 5.10.2 or ISO/IEC 17025 Section 5.4.5)?	X				
S16	I	**LABORATORY STANDARD OPERATING PROCEDURES (SOPS):**					
		Are laboratory SOPs current and on file for each method performed?	X				

1 O = organic analyses; I = inorganic analyses (and general chemistry, when applicable).
2 NA = Not applicable.
3 NR = Not Reviewed.
4 ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

WET CHEMISTRY DATA ASSESSMENT CHECKLIST

Wet Chemistry	Batch Number:	

ER #[1]	DESCRIPTION
1	
2	
3	
4	
5	
6	

1 ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked on the LRC)

ALS Group, USA

Date: 30-Oct-25

Client: ALS Environmental
Project: HS25080440
Work Order: **25080068**

Work Order Sample Summary

Lab Samp ID	Client Sample ID	Matrix	Tag Number	Collection Date	Date Received	Hold
25080068-01	MW-39R	Water		8/8/2025 08:35	8/12/2025 09:30	☐
25080068-02	MW-40	Water		8/8/2025 09:55	8/12/2025 09:30	☐
25080068-03	MW-41	Water		8/8/2025 11:10	8/12/2025 09:30	☐
25080068-04	MW-62	Water		8/8/2025 09:15	8/12/2025 09:30	☐
25080068-05	MW-63	Water		8/8/2025 11:50	8/12/2025 09:30	☐
25080068-06	MW-64	Water		8/8/2025 10:35	8/12/2025 09:30	☐
25080068-07	MW-23R	Water		8/8/2025 11:45	8/12/2025 09:30	☐
25080068-08	MW-28D	Water		8/8/2025 09:50	8/12/2025 09:30	☐
25080068-09	MW-42	Water		8/8/2025 10:25	8/12/2025 09:30	☐
25080068-10	MW-43	Water		8/8/2025 12:25	8/12/2025 09:30	☐
25080068-11	MW-44	Water		8/8/2025 08:55	8/12/2025 09:30	☐
25080068-12	MW-46R	Water		8/8/2025 08:05	8/12/2025 09:30	☐
25080068-13	MW-47	Water		8/8/2025 10:50	8/12/2025 09:30	☐
25080068-14	MW-48	Water		8/8/2025 10:15	8/12/2025 09:30	☐
25080068-15	MW-50	Water		8/8/2025 08:40	8/12/2025 09:30	☐
25080068-16	MW-52	Water		8/8/2025 09:20	8/12/2025 09:30	☐
25080068-17	MW-54	Water		8/8/2025 08:25	8/12/2025 09:30	☐
25080068-18	MW-55R	Water		8/8/2025 09:00	8/12/2025 09:30	☐
25080068-19	MW-58	Water		8/8/2025 09:40	8/12/2025 09:30	☐
25080068-20	MW-65	Water		8/8/2025 09:35	8/12/2025 09:30	☐
25080068-21	MW-36	Water		8/8/2025 09:05	8/12/2025 09:30	☐
25080068-22	MW-37	Water		8/8/2025 11:30	8/12/2025 09:30	☐
25080068-23	MW-38R	Water		8/8/2025 10:55	8/12/2025 09:30	☐
25080068-24	MW-60	Water		8/8/2025 08:20	8/12/2025 09:30	☐
25080068-25	MW-61R	Water		8/8/2025 09:55	8/12/2025 09:30	☐
25080068-26	Field Blank-01	Water		8/8/2025 10:10	8/12/2025 09:30	☐
25080068-27	Field Duplicate 1	Water		8/8/2025 11:00	8/12/2025 09:30	☐
25080068-28	Field Duplicate 2	Water		8/8/2025 09:00	8/12/2025 09:30	☐

ALS Group, USA

Date: 30-Oct-25

Client: ALS Environmental
Project: HS25080440
WorkOrder: **25080068**

QUALIFIERS, ACRONYMS, UNITS

Qualifier	Description
*	Value exceeds Regulatory Limit
**	Estimated Value
a	Analyte is non-accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
Hr	BOD/CBOD - Sample was reset outside Hold Time, value should be considered estimated.
J	Analyte is present at an estimated concentration between the MDL and Report Limit
n	Analyte accreditation is not offered
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL
X	Analyte was detected in the Method Blank between the MDL and Reporting Limit, sample results may exhibit background or reagent contamination at the observed level.

Acronym	Description
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
LOD	Limit of Detection (see MDL)
LOQ	Limit of Quantitation (see PQL)
MBLK	Method Blank
MDL	Method Detection Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PQL	Practical Quantitation Limit
RPD	Relative Percent Difference
TDL	Target Detection Limit
TNTC	Too Numerous To Count
A	APHA Standard Methods
D	ASTM
E	EPA
SW	SW-846 Update III

Units Reported	Description
mg/L	Milligrams per Liter

ALS Group, USA

Date: 30-Oct-25

Client: ALS Environmental
Project: HS25080440
Work Order: 25080068

Case Narrative

Samples for the above noted Work Order were received on 08/12/2025. The attached "Sample Receipt Checklist" documents the status of custody seals, container integrity, preservation, and temperature compliance.

Samples were analyzed according to the analytical methodology previously transmitted in the "Work Order Acknowledgement". Methodologies are also documented in the "Analytical Result" section for each sample. Quality control results are listed in the "QC Report" section. Sample association for the reported quality control is located at the end of each batch summary. If applicable, results are appropriately qualified in the Analytical Result and QC Report sections. The "Qualifiers" section documents the various qualifiers, units, and acronyms utilized in reporting. A copy of the laboratory's scope of accreditation is available upon request.

With the following exceptions, all sample analyses achieved analytical criteria.

Wet Chemistry:
No deviations or anomalies were noted.

Work Order: 25080068
Client: ALS Environmental
Project: HS25080440

DATES REPORT

Sample ID	Client Sample ID	Matrix	Collection Date	TCLP Date	Prep Date	Analysis Date

Batch ID R423223 **Test Name:** Fluoride

Sample ID	Client Sample ID	Matrix	Collection Date	TCLP Date	Prep Date	Analysis Date
25080068-01 ^	MW-39R	Water	8/8/2025 8:35:00 AM			8/13/2025 03:00 PM
25080068-02 ^	MW-40		8/8/2025 9:55:00 AM			8/13/2025 03:00 PM
25080068-03 ^	MW-41		8/8/2025 11:10:00 AM			8/13/2025 03:00 PM
25080068-04 ^	MW-62		8/8/2025 9:15:00 AM			8/13/2025 03:00 PM
25080068-05 ^	MW-63		8/8/2025 11:50:00 AM			8/13/2025 03:00 PM
25080068-06 ^	MW-64		8/8/2025 10:35:00 AM			8/13/2025 03:00 PM
25080068-07 ^	MW-23R		8/8/2025 11:45:00 AM			8/13/2025 03:00 PM
25080068-08 ^	MW-28D		8/8/2025 9:50:00 AM			8/13/2025 03:00 PM
25080068-09 ^	MW-42		8/8/2025 10:25:00 AM			8/13/2025 03:00 PM
25080068-10 ^	MW-43		8/8/2025 12:25:00 PM			8/13/2025 03:00 PM
25080068-11 ^	MW-44		8/8/2025 8:55:00 AM			8/13/2025 03:00 PM
25080068-12 ^	MW-46R		8/8/2025 8:05:00 AM			8/13/2025 03:00 PM
25080068-13 ^	MW-47		8/8/2025 10:50:00 AM			8/13/2025 03:00 PM
25080068-14 ^	MW-48		8/8/2025 10:15:00 AM			8/13/2025 03:00 PM

Work Order: 25080068
Client: ALS Environmental
Project: HS25080440

DATES REPORT

Sample ID	Client Sample ID	Matrix	Collection Date	TCLP Date	Prep Date	Analysis Date

Batch ID R423223 **Test Name:** Fluoride

Sample ID	Client Sample ID	Matrix	Collection Date	TCLP Date	Prep Date	Analysis Date
25080068-15 ^	MW-50	Water	8/8/2025 8:40:00 AM			8/13/2025 03:00 PM
25080068-16 ^	MW-52		8/8/2025 9:20:00 AM			8/13/2025 03:00 PM
25080068-17 ^	MW-54		8/8/2025 8:25:00 AM			8/13/2025 03:00 PM
25080068-18 ^	MW-55R		8/8/2025 9:00:00 AM			8/13/2025 03:00 PM
25080068-19 ^	MW-58		8/8/2025 9:40:00 AM			8/13/2025 03:00 PM
25080068-20 ^	MW-65		8/8/2025 9:35:00 AM			8/13/2025 03:00 PM
25080068-21 ^	MW-36		8/8/2025 9:05:00 AM			8/13/2025 03:00 PM
25080068-22 ^	MW-37		8/8/2025 11:30:00 AM			8/13/2025 03:00 PM
25080068-23 ^	MW-38R		8/8/2025 10:55:00 AM			8/13/2025 03:00 PM
25080068-24 ^	MW-60		8/8/2025 8:20:00 AM			8/13/2025 03:00 PM
25080068-25 ^	MW-61R		8/8/2025 9:55:00 AM			8/13/2025 03:00 PM
25080068-26 ^	Field Blank-01		8/8/2025 10:10:00 AM			8/13/2025 03:00 PM
25080068-27 ^	Field Duplicate 1		8/8/2025 11:00:00 AM			8/13/2025 03:00 PM
25080068-28 ^	Field Duplicate 2		8/8/2025 9:00:00 AM			8/13/2025 03:00 PM

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-39R
Collection Date: 8/8/2025 08:35 AM

Work Order: 25080068
Lab ID: 25080068-01
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.140**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-40
Collection Date: 8/8/2025 09:55 AM

Work Order: 25080068
Lab ID: 25080068-02
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.150**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-41
Collection Date: 8/8/2025 11:10 AM

Work Order: 25080068
Lab ID: 25080068-03
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.230**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-62
Collection Date: 8/8/2025 09:15 AM

Work Order: 25080068
Lab ID: 25080068-04
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.220**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25080440	**Work Order:**	25080068
Sample ID:	MW-63	**Lab ID:**	25080068-05
Collection Date:	8/8/2025 11:50 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.280**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-64
Collection Date: 8/8/2025 10:35 AM

Work Order: 25080068
Lab ID: 25080068-06
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.300**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25080440	**Work Order:**	25080068
Sample ID:	MW-23R	**Lab ID:**	25080068-07
Collection Date:	8/8/2025 11:45 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.350**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-28D
Collection Date: 8/8/2025 09:50 AM

Work Order: 25080068
Lab ID: 25080068-08
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **KLB**
Fluoride	**0.350**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-42
Collection Date: 8/8/2025 10:25 AM

Work Order: 25080068
Lab ID: 25080068-09
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.600**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-43
Collection Date: 8/8/2025 12:25 PM

Work Order: 25080068
Lab ID: 25080068-10
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **KLB**
Fluoride	**0.620**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-44
Collection Date: 8/8/2025 08:55 AM

Work Order: 25080068
Lab ID: 25080068-11
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.470**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25080440	**Work Order:**	25080068
Sample ID:	MW-46R	**Lab ID:**	25080068-12
Collection Date:	8/8/2025 08:05 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.400**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-47
Collection Date: 8/8/2025 10:50 AM

Work Order: 25080068
Lab ID: 25080068-13
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.440**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-48
Collection Date: 8/8/2025 10:15 AM

Work Order: 25080068
Lab ID: 25080068-14
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.760**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-50
Collection Date: 8/8/2025 08:40 AM

Work Order: 25080068
Lab ID: 25080068-15
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.540**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client:	ALS Environmental		
Project:	HS25080440	**Work Order:**	25080068
Sample ID:	MW-52	**Lab ID:**	25080068-16
Collection Date:	8/8/2025 09:20 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.620**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-54
Collection Date: 8/8/2025 08:25 AM

Work Order: 25080068
Lab ID: 25080068-17
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.510**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-55R
Collection Date: 8/8/2025 09:00 AM

Work Order: 25080068
Lab ID: 25080068-18
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.780**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25080440	**Work Order:**	25080068
Sample ID:	MW-58	**Lab ID:**	25080068-19
Collection Date:	8/8/2025 09:40 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.430**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-65
Collection Date: 8/8/2025 09:35 AM

Work Order: 25080068
Lab ID: 25080068-20
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.420**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-36
Collection Date: 8/8/2025 09:05 AM

Work Order: 25080068
Lab ID: 25080068-21
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.470**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25080440	**Work Order:**	25080068
Sample ID:	MW-37	**Lab ID:**	25080068-22
Collection Date:	8/8/2025 11:30 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **KLB**
Fluoride	**0.300**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: MW-38R
Collection Date: 8/8/2025 10:55 AM

Work Order: 25080068
Lab ID: 25080068-23
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.260**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client:	ALS Environmental		
Project:	HS25080440	**Work Order:**	25080068
Sample ID:	MW-60	**Lab ID:**	25080068-24
Collection Date:	8/8/2025 08:20 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **KLB**
Fluoride	**0.180**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25080440	**Work Order:**	25080068
Sample ID:	MW-61R	**Lab ID:**	25080068-25
Collection Date:	8/8/2025 09:55 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.210**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *30-Oct-25*

Client: ALS Environmental
Project: HS25080440
Sample ID: Field Blank-01
Collection Date: 8/8/2025 10:10 AM

Work Order: 25080068
Lab ID: 25080068-26
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **KLB**
Fluoride	U		0.058	0.10	mg/L	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25080440
Sample ID: Field Duplicate 1
Collection Date: 8/8/2025 11:00 AM

Work Order: 25080068
Lab ID: 25080068-27
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.410**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client: ALS Environmental
Project: HS25080440
Sample ID: Field Duplicate 2
Collection Date: 8/8/2025 09:00 AM

Work Order: 25080068
Lab ID: 25080068-28
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.460**		**0.058**	**0.10**	**mg/L**	1	8/13/2025 15:00

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: 30-Oct-25

WorkOrder: 25080068
InstrumentID: Titrator 1
Test Code: FL_4500C_W
Test Number: A4500-F C-11
Test Name: Fluoride

METHOD DETECTION / REPORTING LIMITS

Matrix: Water **Units:** mg/L

Type	Analyte	CAS	DCS	MDL	Unadjusted MQL
A	Fluoride	16984-48-8	0	0.058	0.10

ALS Group, USA

Date: 30-Oct-25

Client: ALS Environmental
Work Order: 25080068
Project: HS25080440

QC BATCH REPORT

Batch ID: **R423223a** Instrument ID **Titrator 1** Method: **A4500-F C-11**

MBLK Sample ID: **MB-R423223-R423223a** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: Run ID: **TITRATOR 1_250813B** SeqNo: **11589885** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	0.07	0.058	0.10								J

LCS Sample ID: **LCS-R423223-R423223a** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: Run ID: **TITRATOR 1_250813B** SeqNo: **11589886** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	4.98	0.058	0.10	5	0	99.6	90-111	0			

MS Sample ID: **25080067-21AMS** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: Run ID: **TITRATOR 1_250813B** SeqNo: **11589888** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.05	0.058	0.10	5	0.15	98	90-111	0			

MS Sample ID: **25080068-05AMS** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: **MW-63** Run ID: **TITRATOR 1_250813B** SeqNo: **11589900** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	4.95	0.058	0.10	5	0.28	93.4	90-111	0			

MSD Sample ID: **25080067-21AMSD** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: Run ID: **TITRATOR 1_250813B** SeqNo: **11589889** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	4.98	0.058	0.10	5	0.15	96.6	90-111	5.05	1.4	20	

MSD Sample ID: **25080068-05AMSD** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: **MW-63** Run ID: **TITRATOR 1_250813B** SeqNo: **11589901** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	4.93	0.058	0.10	5	0.28	93	90-111	4.95	0.405	20	

The following samples were analyzed in this batch:

25080068-01A	25080068-02A	25080068-03A
25080068-04A	25080068-05A	25080068-06A
25080068-07A	25080068-08A	25080068-09A
25080068-10A	25080068-11A	25080068-12A
25080068-13A	25080068-14A	

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

QC BATCH REPORT

Batch ID: **R423223b** Instrument ID **Titrator 1** Method: **A4500-F C-11**

MBLK Sample ID: **MB-R423223-R423223b** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: Run ID: **TITRATOR 1_250813B** SeqNo: **11589911** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	U	0.058	0.10								

LCS Sample ID: **LCS-R423223-R423223b** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: Run ID: **TITRATOR 1_250813B** SeqNo: **11589912** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	4.9	0.058	0.10	5	0	98	90-111	0			

MS Sample ID: **25080068-15AMS** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: **MW-50** Run ID: **TITRATOR 1_250813B** SeqNo: **11589914** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.36	0.058	0.10	5	0.54	96.4	90-111	0			

MS Sample ID: **25080068-19AMS** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: **MW-58** Run ID: **TITRATOR 1_250813B** SeqNo: **11589920** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.31	0.058	0.10	5	0.43	97.6	90-111	0			

MSD Sample ID: **25080068-15AMSD** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: **MW-50** Run ID: **TITRATOR 1_250813B** SeqNo: **11589915** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.49	0.058	0.10	5	0.54	99	90-111	5.36	2.4	20	

MSD Sample ID: **25080068-19AMSD** Units: **mg/L** Analysis Date: **8/13/2025 03:00 PM**
Client ID: **MW-58** Run ID: **TITRATOR 1_250813B** SeqNo: **11589921** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.29	0.058	0.10	5	0.43	97.2	90-111	5.31	0.377	20	

The following samples were analyzed in this batch:

25080068-15A	25080068-16A	25080068-17A
25080068-18A	25080068-19A	25080068-20A
25080068-21A	25080068-22A	25080068-23A
25080068-24A	25080068-25A	25080068-26A
25080068-27A	25080068-28A	

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

25080068

ALS - HOUSTON: ALS Environmental
Project: HS25080440

10450 Stancliff Rd, Ste 210
Houston, TX 77099
T: +1 281 530 5656
F: +1 281 530 5887
www.alsglobal.com

Subcontract Chain of Custody

SAMPLING STATE: Texas

COC ID: 29221

SUBCONTRACT TO:

ALS Group USA, Corp.
3352 - 128th Ave
Holland, MI 494249263

Phone: +1 616 399 6070

CUSTOMER INFORMATION:

Company: ALS Houston
Contact: Andy C. Neir
Address: 10450 Stancliff Rd, Ste 210
Phone: +1 281 530 5656
Email: Andrew.Neir@ALSGlobal.com
Alternate Contact: Jumoke M. Lawal
Email: jumoke.lawal@alsglobal.com

INVOICE INFORMATION:

Company: ALS Houston
Contact: Accounts Payable
Address: 10450 Stancliff Rd, Ste 210
Phone: +1 281 530 5656
Reference: HS25080440
TSR: Ron Martino

	LAB SAMPLE ID / ANALYSIS REQUESTED	CLIENT SAMPLE ID	MATRIX	COLLECT DATE / DUE DATE
1.	**HS25080440-01**	**MW-39R**	**Water**	**08 Aug 2025 08:35**
	Fluoride by ISE 4500			15 Aug 2025
2.	**HS25080440-02**	**MW-40**	**Water**	**08 Aug 2025 09:55**
	Fluoride by ISE 4500			15 Aug 2025
3.	**HS25080440-03**	**MW-41**	**Water**	**08 Aug 2025 11:10**
	Fluoride by ISE 4500			15 Aug 2025
4.	**HS25080440-04**	**MW-62**	**Water**	**08 Aug 2025 09:15**
	Fluoride by ISE 4500			15 Aug 2025
5.	**HS25080440-05**	**MW-63**	**Water**	**08 Aug 2025 11:50**
	Fluoride by ISE 4500			15 Aug 2025
6.	**HS25080440-06**	**MW-64**	**Water**	**08 Aug 2025 10:35**
	Fluoride by ISE 4500			15 Aug 2025
7.	**HS25080440-07**	**MW-23R**	**Water**	**08 Aug 2025 11:45**
	Fluoride by ISE 4500			15 Aug 2025
8.	**HS25080440-08**	**MW-28D**	**Water**	**08 Aug 2025 09:50**
	Fluoride by ISE 4500			15 Aug 2025
9.	**HS25080440-09**	**MW-42**	**Water**	**08 Aug 2025 10:25**

Subcontract Chain of Custody

SAMPLING STATE: Texas | **COC ID: 29221**

	LAB SAMPLE ID / ANALYSIS REQUESTED	CLIENT SAMPLE ID	MATRIX	COLLECT DATE / DUE DATE
	Fluoride by ISE 4500			15 Aug 2025
10.	**HS25080440-10**	**MW-43**	**Water**	**08 Aug 2025 12:25**
	Fluoride by ISE 4500			15 Aug 2025
11.	**HS25080440-11**	**MW-44**	**Water**	**08 Aug 2025 08:55**
	Fluoride by ISE 4500			15 Aug 2025
12.	**HS25080440-12**	**MW-46R**	**Water**	**08 Aug 2025 08:05**
	Fluoride by ISE 4500			15 Aug 2025
13.	**HS25080440-13**	**MW-47**	**Water**	**08 Aug 2025 10:50**
	Fluoride by ISE 4500			15 Aug 2025
14.	**HS25080440-14**	**MW-48**	**Water**	**08 Aug 2025 10:15**
	Fluoride by ISE 4500			15 Aug 2025
15.	**HS25080440-15**	**MW-50**	**Water**	**08 Aug 2025 08:40**
	Fluoride by ISE 4500			15 Aug 2025
16.	**HS25080440-16**	**MW-52**	**Water**	**08 Aug 2025 09:20**
	Fluoride by ISE 4500			15 Aug 2025
17.	**HS25080440-17**	**MW-54**	**Water**	**08 Aug 2025 08:25**
	Fluoride by ISE 4500			15 Aug 2025
18.	**HS25080440-18**	**MW-55R**	**Water**	**08 Aug 2025 09:00**
	Fluoride by ISE 4500			15 Aug 2025
19.	**HS25080440-19**	**MW-58**	**Water**	**08 Aug 2025 09:40**
	Fluoride by ISE 4500			15 Aug 2025
20.	**HS25080440-20**	**MW-65**	**Water**	**08 Aug 2025 09:35**
	Fluoride by ISE 4500			15 Aug 2025
21.	**HS25080440-21**	**MW-36**	**Water**	**08 Aug 2025 09:05**
	Fluoride by ISE 4500			15 Aug 2025
22.	**HS25080440-22**	**MW-37**	**Water**	**08 Aug 2025 11:30**
	Fluoride by ISE 4500			15 Aug 2025
23.	**HS25080440-23**	**MW-38R**	**Water**	**08 Aug 2025 10:55**
	Fluoride by ISE 4500			15 Aug 2025
24.	**HS25080440-24**	**MW-60**	**Water**	**08 Aug 2025 08:20**
	Fluoride by ISE 4500			15 Aug 2025

Subcontract Chain of Custody

SAMPLING STATE: **Texas** **COC ID:** **29221**

LAB SAMPLE ID / ANALYSIS REQUESTED	CLIENT SAMPLE ID	MATRIX	COLLECT DATE / DUE DATE
25. HS25080440-25	**MW-61R**	**Water**	**08 Aug 2025 09:55**
Fluoride by ISE 4500			15 Aug 2025
26. HS25080440-26	**Field Blank-01**	**Water**	**08 Aug 2025 10:10**
Fluoride by ISE 4500			15 Aug 2025
27. HS25080440-27	**Field Duplicate 1**	**Water**	**08 Aug 2025 11:00**
Fluoride by ISE 4500			15 Aug 2025
28. HS25080440-28	**Field Duplicate 2**	**Water**	**08 Aug 2025 09:00**
Fluoride by ISE 4500			15 Aug 2025

Comments: Please analyze for the analysis listed above.
Send report to the emails shown above.
Need TRC EDD
MW-63 and MW58 MS/ MSD

QC Level: TRRP LRC (TRRP checklist only+Level II (normal))

Relinquished By: Date/Time: 8/11/25 1800

Received By: Date/Time: 8-12-25 930

Cooler ID(s): Temperature(s): 3.0 [illegible]

ALS Group, USA
Holland, Michigan

Sample Receipt Checklist

Client Name: **ALS - HOUSTON**
Date/Time Received: **12-Aug-25 09:30**

Work Order: **25080068**
Received by: **JD**

Checklist completed by	Jason Delinger (eSignature)	18-Aug-25 (Date)	Reviewed by:	Chelsey Cook (eSignature)	18-Aug-25 (Date)

Matrices: Water
Carrier name: FedEx

	Yes	No	
Shipping container/cooler in good condition?	☑	☐	Not Present ☐
Custody seals intact on shipping container/cooler?	☑	☐	Not Present ☐
Custody seals intact on sample bottles?	☐	☐	Not Present ☑
Chain of custody present?	☑	☐	
Chain of custody signed when relinquished and received?	☑	☐	
Chain of custody agrees with sample labels?	☑	☐	
Samples in proper container/bottle?	☑	☐	
Sample containers intact?	☑	☐	
Sufficient sample volume for indicated test?	☑	☐	
All samples received within holding time?	☑	☐	
Container/Temp Blank temperature in compliance?	☑	☐	
Sample(s) received on ice?	☑	☐	

Temperature(s)/Thermometer(s): 2.5/2.5 c | ir6

Cooler(s)/Kit(s):

Date/Time sample(s) sent to storage: 8/18/2025 10:34:08 AM

	Yes	No	
Water - VOA vials have zero headspace?	☐	☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	☑	☐	N/A ☐
pH adjusted?	☐	☑	N/A ☐

pH adjusted by: -

Login Notes:

Client Contacted:
Date Contacted:
Person Contacted:

Contacted By:
Regarding:

Comments:

CorrectiveAction:

10450 Stancliff Rd. Suite 210
Houston, TX 77099
T: +1 281 530 5656
F: +1 281 530 5887

September 15, 2025

Lori Burris
TRC
11767 Katy Freeway
Suite 850
Houston, TX 77079

Work Order: **HS25090251**

Laboratory Results for: **NRG-WA Parish CCR Resampling**

Dear Lori Burris,

ALS Environmental received 10 sample(s) on Sep 05, 2025 for the analysis presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Generated By: DAYNA.FISHER

Andy C. Neir
Project Manager

Client:	TRC	**TRRP Laboratory Data Package Cover Page**
Project:	NRG-WA Parish CCR Resampling	
WorkOrder:	**HS25090251**	

This data package consists of all or some of the following as applicable:

This signature page, the laboratory review checklist, and the following reportable data:

R1 Field chain-of-custody documentation;

R2 Sample identification cross-reference;

R3 Test reports (analytical data sheets) for each environmental sample that includes:
a) Items consistent with NELAC Chapter 5,
b) dilution factors,
c) preparation methods,
d) cleanup methods, and
e) if required for the project, tentatively identified compounds (TICs).

R4 Surrogate recovery data including:
a) Calculated recovery (%R), and
b) The laboratory's surrogate QC limits.

R5 Test reports/summary forms for blank samples;

R6 Test reports/summary forms for laboratory control samples (LCSs) including:
a) LCS spiking amounts,
b) Calculated %R for each analyte, and
c)The laboratory's LCS QC limits.

R7 Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
a) Samples associated with the MS/MSD clearly identified,
b) MS/MSD spiking amounts,
c) Concentration of each MS/MSD analyte measured in the parent and spiked samples,
d) Calculated %Rs and relative percent differences (RPDs), and
e) The laboratory's MS/MSD QC limits.

R8 Laboratory analytical duplicate (if applicable) recovery and precision:
a) the amount of analyte measured in the duplicate,
b) the calculated RPD, and
c) the laboratory's QC limits for analytical duplicates.

R9 List of method quantitation limits (MQLs) and detectability check sample results for each analyte for each method and matrix.

R10 Other problems or anomalies.
The Exception Report for each "No" or "Not Reviewed (NR)" item in Laboratory Review Checklist and for each analyte, matrix, and method for which the laboratory does not hold NELAC accreditation under the Texas Laboratory Accreditation Program.

Client:	TRC
Project:	NRG-WA Parish CCR Resampling
WorkOrder:	**HS25090251**

TRRP Laboratory Data Package Cover Page

Release Statement: I am responsible for the release of this laboratory data package. This laboratory is NELAC accredited under the Texas Laboratory Accreditation Program for all the methods, analytes and matrices reported in this data package except as noted in the Exception Reports. The data have been reviewed and are technically compliant with the requirements of the methods used, except where noted by the laboratory in the attached exception reports. By my signature below, I affirm to the best of my knowledge, all problems/anomalies, observed by the laboratory have been identified by the laboratory in the Laboratory Review Checklist, and no information affecting the quality of the data has been knowingly withheld.

Check, if applicable: [NA] This laboratory meets an exception under 30 TAC §25.6 and was last inspected by [ ] TCEQ or [ ] _______________ on (enter date of last inspection). Any findings affecting the data in this laboratory data package are noted in the Exception Reports herein. The official signing the cover page of the report in which these data are used is responsible for releasing this data package and is by signature affirming the above release statement is true.

Andy C. Neir
Project Manager

Laboratory Review Checklist: Reportable Data							
Laboratory Name: ALS Laboratory Group			LRC Date: 09/15/2025				
Project Name: NRG-WA Parish CCR Resampling			Laboratory Job Number: HS25090251				
Reviewer Name: Andy Neir			Prep Batch Number(s): 232601, R521387, R521391, R521498, R521575, R521710				
#[1]	**A[2]**	**Description**	**Yes**	**No**	**NA[3]**	**NR[4]**	**ER#[5]**
R1	OI	**Chain-of-custody (C-O-C)**					
		Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?	X				
		Were all departures from standard conditions described in an exception report?	X				
R2	OI	**Sample and quality control (QC) identification**					
		Are all field sample ID numbers cross-referenced to the laboratory ID numbers?	X				
		Are all laboratory ID numbers cross-referenced to the corresponding QC data?	X				
R3	OI	**Test reports**					
		Were all samples prepared and analyzed within holding times?		X			1
		Other than those results < MQL, were all other raw values bracketed by calibration standards?	X				
		Were calculations checked by a peer or supervisor?	X				
		Were all analyte identifications checked by a peer or supervisor?	X				
		Were sample detection limits reported for all analytes not detected?	X				
		Were all results for soil and sediment samples reported on a dry weight basis?			X		
		Were % moisture (or solids) reported for all soil and sediment samples?			X		
		Were bulk soils/solids samples for volatile analysis extracted with methanol per SW-846 Method 5035?			X		
		If required for the project, TICs reported?			X		
R4	O	**Surrogate recovery data**					
		Were surrogates added prior to extraction?			X		
		Were surrogate percent recoveries in all samples within the laboratory QC limits?			X		
R5	OI	**Test reports/summary forms for blank samples**					
		Were appropriate type(s) of blanks analyzed?	X				
		Were blanks analyzed at the appropriate frequency?	X				
		Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X				
		Were blank concentrations < MQL?	X				
R6	OI	**Laboratory control samples (LCS):**					
		Were all COCs included in the LCS?	X				
		Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X				
		Were LCSs analyzed at the required frequency?	X				
		Were LCS (and LCSD, if applicable) %Rs within the laboratory QC limits?	X				
		Does the detectability data document the laboratory's capability to detect the COCs at the MDL used to calculate the SDLs?	X				
		Was the LCSD RPD within QC limits?	X				
R7	OI	**Matrix spike (MS) and matrix spike duplicate (MSD) data**					
		Were the project/method specified analytes included in the MS and MSD?	X				
		Were MS/MSD analyzed at the appropriate frequency?	X				
		Were MS (and MSD, if applicable) %Rs within the laboratory QC limits?		X			2
		Were MS/MSD RPDs within laboratory QC limits?	X				
R8	OI	**Analytical duplicate data**					
		Were appropriate analytical duplicates analyzed for each matrix?	X				
		Were analytical duplicates analyzed at the appropriate frequency?	X				
		Were RPDs or relative standard deviations within the laboratory QC limits?	X				
R9	OI	**Method quantitation limits (MQLs):**					
		Are the MQLs for each method analyte included in the laboratory data package?	X				
		Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X				
		Are unadjusted MQLs and DCSs included in the laboratory data package?	X				
R10	OI	**Other problems/anomalies**					
		Are all known problems/anomalies/special conditions noted in this LRC and ER?	X				3
		Were all necessary corrective actions performed for the reported data?	X				
		Was applicable and available technology used to lower the SDL and minimize the matrix interference affects on the sample results?	X				
		Is the laboratory NELAC-accredited under the Texas Laboratory Program for the analytes, matrices and methods associated with this laboratory data package?	X				

Laboratory Review Checklist: Supporting Data

Laboratory Name: ALS Laboratory Group	LRC Date: 09/15/2025
Project Name: NRG-WA Parish CCR Resampling	Laboratory Job Number: HS25090251
Reviewer Name: Andy Neir	Prep Batch Number(s): 232601, R521387, R521391, R521498, R521575, R521710

#[1]	A[2]	Description	Yes	No	NA[3]	NR[4]	ER#[5]
S1	OI	**Initial calibration (ICAL)**					
		Were response factors and/or relative response factors for each analyte within QC limits?	X				
		Were percent RSDs or correlation coefficient criteria met?	X				
		Was the number of standards recommended in the method used for all analytes?	X				
		Were all points generated between the lowest and highest standard used to calculate the curve?	X				
		Are ICAL data available for all instruments used?	X				
		Has the initial calibration curve been verified using an appropriate second source standard?	X				
S2	OI	**Initial and continuing calibration verification (ICCV and CCV) and continuing calibration blank (CCB)**					
		Was the CCV analyzed at the method-required frequency?	X				
		Were percent differences for each analyte within the method-required QC limits?	X				
		Was the ICAL curve verified for each analyte?	X				
		Was the absolute value of the analyte concentration in the inorganic CCB < MDL?		X			4
S3	O	**Mass spectral tuning:**					
		Was the appropriate compound for the method used for tuning?	X				
		Were ion abundance data within the method-required QC limits?	X				
S4	O	**Internal standards (IS):**					
		Were IS area counts and retention times within the method-required QC limits?	X				
S5	OI	**Raw data** (NELAC section 1 appendix A glossary, and section 5.12 or ISO/IEC 17025 section					
		Were the raw data (for example, chromatograms, spectral data) reviewed by an analyst?	X				
		Were data associated with manual integrations flagged on the raw data?	X				
S6	O	**Dual column confirmation**					
		Did dual column confirmation results meet the method-required QC?			X		
S7	O	**Tentatively identified compounds (TICs):**					
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X		
S8	I	**Interference Check Sample (ICS) results:**					
		Were percent recoveries within method QC limits?	X				
S9	I	**Serial dilutions, post digestion spikes, and method of standard additions**					
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?	X				
S10	OI	**Method detection limit (MDL) studies**					
		Was a MDL study performed for each reported analyte?	X				
		Is the MDL either adjusted or supported by the analysis of DCSs?	X				
S11	OI	**Proficiency test reports:**					
		Was the laboratory's performance acceptable on the applicable proficiency tests or evaluation studies?	X				
S12	OI	**Standards documentation**					
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X				
S13	OI	**Compound/analyte identification procedures**					
		Are the procedures for compound/analyte identification documented?	X				
S14	OI	**Demonstration of analyst competency (DOC)**					
		Was DOC conducted consistent with NELAC Chapter 5C or ISO/IEC 4?	X				
		Is documentation of the analyst’s competency up-to-date and on file?	X				
S15	OI	**Verification/validation documentation for methods** (NELAC Chap 5 or ISO/IEC 17025 Section 5)					
		Are all the methods used to generate the data documented, verified, and validated, where applicable?	X				
S16	OI	**Laboratory standard operating procedures (SOPs):**					
		Are laboratory SOPs current and on file for each method performed?	X				

Items identified by the letter “R” must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter “S” should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);
NA = Not Applicable;
NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if “NR” or “No” is checked).

Laboratory Review Checklist: Exception Reports	
Laboratory Name: ALS Laboratory Group	LRC Date: 09/15/2025
Project Name: NRG-WA Parish CCR Resampling	Laboratory Job Number: HS25090251
Reviewer Name: Andy Neir	Prep Batch Number(s): 232601, R521387, R521391, R521498, R521575, R521710

ER#[5]	Description
1	Sample received outside method holding time for pH. pH is an immediate test. Sample results are flagged with an "H" qualifier. The temperature at the time of pH is reported. Please note that all pH results are already normalized to a temperature of 25 °C.
2	Batch 232601, Metals by method SW6020, Sample HS25090224-01, MS and MSD were performed on an unrelated sample Batch R521498, Anions by method E300.0, Sample MW-39R, MS/MSD recovered outside control limits for sulfate due to sample matrix interference.
3	Analyses of Fluoride were performed by ALS Holland, MI. Report and Laboratory Review Checklist are appended.
4	See Run Log and CCB Exception Reports

Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
O = Organic Analyses; I = Inorganic Analyses (and general chemistry, when applicable);
NA = Not Applicable;
NR = Not Reviewed;
R# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

FORM 13 - ANALYSIS RUN LOG

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251
Start Date: 09-Sep-2025 End Date: 09-Sep-2025

Run ID:ICPMS07_521355
Instrument:ICPMS07
Method:SW6020A

Sample No.	D/F	Time	FileID	Analytes
ICV	1	09-Sep-2025 09:43	020_ICV.d	B CA
LLICV5	1	09-Sep-2025 09:45	021LCV5.d	B CA
LLICV2	1	09-Sep-2025 09:47	022LCV2.d	B CA
ICB	1	09-Sep-2025 09:50	023_ICB.d	B CA
ICSA	1	09-Sep-2025 09:52	024ICSA.d	B CA
ICSAB	1	09-Sep-2025 09:54	025ICSB.d	B CA
CCV 1	1	09-Sep-2025 10:01	028_CCV.d	B CA
CCB 1	1	09-Sep-2025 10:04	029_CCB.d	B CA
MBLK-232601	1	09-Sep-2025 10:11	032SMPL.d	B CA
CCV 2	1	09-Sep-2025 10:30	040_CCV.d	B CA
CCB 2	1	09-Sep-2025 10:32	041_CCB.d	B CA
CCV 3	1	09-Sep-2025 10:58	052_CCV.d	B CA
CCB 3	1	09-Sep-2025 11:00	053_CCB.d	B CA
LCS-232601	1	09-Sep-2025 11:05	055SMPL.d	B CA
CCV 4	1	09-Sep-2025 11:26	064_CCV.d	B CA
CCB 4	1	09-Sep-2025 11:28	065_CCB.d	B CA
CCV 5	1	09-Sep-2025 11:57	076_CCV.d	B CA
CCB 5	1	09-Sep-2025 12:00	077_CCB.d	B CA
CCV 6	1	09-Sep-2025 12:26	088_CCV.d	B CA
CCB 6	1	09-Sep-2025 12:28	089_CCB.d	B CA
ZZZZZZSD	5	09-Sep-2025 12:40	094SMPL.d	CA
ZZZZZZMS	1	09-Sep-2025 12:42	095SMPL.d	B CA
ZZZZZZMSD	1	09-Sep-2025 12:44	096SMPL.d	B CA
ZZZZZZPDS	1	09-Sep-2025 12:47	097SMPL.d	CA
CCV 7	1	09-Sep-2025 12:54	100_CCV.d	B CA
CCB 7	1	09-Sep-2025 12:56	101_CCB.d	B CA
MW-39R	1	09-Sep-2025 13:01	103SMPL.d	B
MW-63	1	09-Sep-2025 13:04	104SMPL.d	B
MW-37	1	09-Sep-2025 13:06	105SMPL.d	B
MW-38R	1	09-Sep-2025 13:08	106SMPL.d	B
CCV 8	1	09-Sep-2025 13:22	112_CCV.d	B CA
CCB 8	1	09-Sep-2025 13:25	113_CCB.d	B CA
ZZZZZZSD	100	09-Sep-2025 13:30	115SMPL.d	B
ZZZZZZPDS	20	09-Sep-2025 13:32	116SMPL.d	B
MW-58	20	09-Sep-2025 13:34	117SMPL.d	B
CCV 9	1	09-Sep-2025 13:51	124_CCV.d	B CA
CCB 9	1	09-Sep-2025 13:53	125_CCB.d	B CA
CCV 10	1	09-Sep-2025 14:20	136_CCV.d	B CA
CCB 10	1	09-Sep-2025 14:22	137_CCB.d	B CA
MW-23R	100	09-Sep-2025 14:27	139SMPL.d	CA
CCV 11	1	09-Sep-2025 14:48	148_CCV.d	B CA
CCB 11	1	09-Sep-2025 14:50	149_CCB.d	B CA
LLCCV2	1	09-Sep-2025 15:46	167LCV2.d	B CA
LLCCV5	1	09-Sep-2025 15:48	168LCV5.d	B CA
ICCB 12	1	09-Sep-2025 15:50	169_ICB.d	B CA
ICCV 12	1	09-Sep-2025 15:53	170_ICV.d	B CA
CCV 13	1	09-Sep-2025 16:05	175_CCV.d	B CA
CCB 13	1	09-Sep-2025 16:07	176_CCB.d	B CA
CCV 14	1	09-Sep-2025 16:33	186_CCV.d	B CA
CCB 14	1	09-Sep-2025 16:35	187_CCB.d	B CA

FORM 13 - ANALYSIS RUN LOG

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251
Start Date: 09-Sep-2025 End Date: 09-Sep-2025

Run ID:ICPMS07_521355
Instrument:ICPMS07
Method:SW6020A

Sample No.	D/F	Time	FileID	Analytes
CCV 15	1	09-Sep-2025 17:02	195_CCV.d	B CA
CCB 15	1	09-Sep-2025 17:04	196_CCB.d	B CA
CCV 16	1	09-Sep-2025 17:44	207_CCV.d	B CA
CCB 16	1	09-Sep-2025 17:46	208_CCB.d	B CA
CCV 17	1	09-Sep-2025 18:15	219_CCV.d	B CA
CCB 17	1	09-Sep-2025 18:17	220_CCB.d	B CA
CCV 18	1	09-Sep-2025 18:49	231_CCV.d	B CA
CCB 18	1	09-Sep-2025 18:51	232_CCB.d	B CA
CCV 19	1	09-Sep-2025 19:18	243_CCV.d	B CA
CCB 19	1	09-Sep-2025 19:21	244_CCB.d	B CA
CCV 20	1	09-Sep-2025 19:49	255_CCV.d	B CA
CCB 20	1	09-Sep-2025 19:51	256_CCB.d	B CA
CCV 21	1	09-Sep-2025 20:18	267_CCV.d	B CA
CCB 21	1	09-Sep-2025 20:20	268_CCB.d	B CA
CCV 22	1	09-Sep-2025 20:36	275_CCV.d	B CA
CCB 22	1	09-Sep-2025 20:39	276_CCB.d	B CA
CCV 23	1	09-Sep-2025 21:05	287_CCV.d	B CA
CCB 23	1	09-Sep-2025 21:07	288_CCB.d	B CA
CCV 24	1	09-Sep-2025 21:12	290_CCV.d	B CA
CCB 24	1	09-Sep-2025 21:14	291_CCB.d	B CA
LLCCV2	1	09-Sep-2025 21:19	293LCV2.d	B CA
LLCCV5	1	09-Sep-2025 21:21	294LCV5.d	B CA
ICSA	1	09-Sep-2025 21:26	296ICSA.d	B CA
ICSAB	1	09-Sep-2025 21:28	297ICSB.d	B CA

CCB EXCEPTIONS REPORT

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251

Run ID:ICPMS07_521355
Instrument:ICPMS07
Method:SW6020A

CCB 1 Date: 09-Sep-2025 10:04 Seq: 9022705 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	14.16	8	50

CCB 2 Date: 09-Sep-2025 10:32 Seq: 9022709 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	17.5	8	50

CCB 3 Date: 09-Sep-2025 11:00 Seq: 9022860 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	14.07	8	50

CCB 4 Date: 09-Sep-2025 11:28 Seq: 9022917 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	15.04	8	50

CCB 5 Date: 09-Sep-2025 12:00 Seq: 9023028 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	18.15	8	50

CCB 6 Date: 09-Sep-2025 12:28 Seq: 9023086 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	17.41	8	50

CCB 7 Date: 09-Sep-2025 12:56 Seq: 9023126 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	23.58	8	50

CCB 8 Date: 09-Sep-2025 13:25 Seq: 9023227 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	20.16	8	50

CCB 9 Date: 09-Sep-2025 13:53 Seq: 9023272 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	17.85	8	50

CCB 10 Date: 09-Sep-2025 14:22 Seq: 9023430 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	18.78	8	50

CCB 11 Date: 09-Sep-2025 14:50 Seq: 9023491 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	17.65	8	50

CCB 13 Date: 09-Sep-2025 16:07 Seq: 9023773 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	15.28	8	50

CCB 14 Date: 09-Sep-2025 16:35 Seq: 9023784 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	14.54	8	50

CCB 15 Date: 09-Sep-2025 17:04 Seq: 9023838 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit

CCB EXCEPTIONS REPORT

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251

Run ID:ICPMS07_521355
Instrument:ICPMS07
Method:SW6020A

	Analyte	Result	MDL	Report Limit
	Boron	13.97	8	50

CCB 16 Date: 09-Sep-2025 17:46 Seq: 9023850 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	13.13	8	50

CCB 17 Date: 09-Sep-2025 18:17 Seq: 9023909 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	15.2	8	50

CCB 18 Date: 09-Sep-2025 18:51 Seq: 9023923 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	12.66	8	50

CCB 19 Date: 09-Sep-2025 19:21 Seq: 9023935 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	12.91	8	50

CCB 20 Date: 09-Sep-2025 19:51 Seq: 9023947 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	12.76	8	50

CCB 21 Date: 09-Sep-2025 20:20 Seq: 9024154 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	13.82	8	50

CCB 22 Date: 09-Sep-2025 20:39 Seq: 9024157 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	13.96	8	50

CCB 23 Date: 09-Sep-2025 21:07 Seq: 9024169 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	18.58	8	50

CCB 24 Date: 09-Sep-2025 21:14 Seq: 9024172 D/F: 1 Units: ug/L

Analyte	Result	MDL	Report Limit
Boron	15.71	8	50

Client: TRC
Project: NRG-WA Parish CCR Resampling
Work Order: HS25090251

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS25090251-01	MW-41	Water		05-Sep-2025 09:15	05-Sep-2025 12:10	☐
HS25090251-02	MW-39R	Water		05-Sep-2025 09:25	05-Sep-2025 12:10	☐
HS25090251-03	MW-64	Water		05-Sep-2025 08:25	05-Sep-2025 12:10	☐
HS25090251-04	MW-63	Water		05-Sep-2025 10:25	05-Sep-2025 12:10	☐
HS25090251-05	MW-62	Water		05-Sep-2025 08:45	05-Sep-2025 12:10	☐
HS25090251-06	MW-37	Water		05-Sep-2025 08:25	05-Sep-2025 12:10	☐
HS25090251-07	MW-38R	Water		05-Sep-2025 09:05	05-Sep-2025 12:10	☐
HS25090251-08	MW-61R	Water		05-Sep-2025 09:40	05-Sep-2025 12:10	☐
HS25090251-09	MW-58	Water		05-Sep-2025 10:30	05-Sep-2025 12:10	☐
HS25090251-10	MW-23R	Water		05-Sep-2025 10:45	05-Sep-2025 12:10	☐

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG-WA Parish CCR Resampling		WorkOrder:HS25090251
Sample ID:	MW-41		Lab ID:HS25090251-01
Collection Date:	05-Sep-2025 09:15		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	15-Sep-2025 10:01

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG-WA Parish CCR Resampling		WorkOrder:HS25090251
Sample ID:	MW-39R		Lab ID:HS25090251-02
Collection Date:	05-Sep-2025 09:25		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 08-Sep-2025		Analyst: MSC
Boron	**0.387**		**0.00800**	**0.0500**	**mg/L**	1	09-Sep-2025 13:01
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: HB
Sulfate	**311**		**2.00**	**5.00**	**mg/L**	10	09-Sep-2025 10:23

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG-WA Parish CCR Resampling		WorkOrder:HS25090251
Sample ID:	MW-64		Lab ID:HS25090251-03
Collection Date:	05-Sep-2025 08:25		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
PH BY SW9040C		**Method:SW9040C**					Analyst: CD
pH	**6.99**	H	**0.100**	**1.00**	**pH Units**	1	09-Sep-2025 10:30
Temp Deg C @pH	**20.4**	H	**0**	**0**	**DEG C**	1	09-Sep-2025 10:30
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	15-Sep-2025 10:01

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG-WA Parish CCR Resampling		WorkOrder:HS25090251
Sample ID:	MW-63		Lab ID:HS25090251-04
Collection Date:	05-Sep-2025 10:25		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 08-Sep-2025		Analyst: MSC
Boron	**0.232**		**0.00800**	**0.0500**	**mg/L**	1	09-Sep-2025 13:04
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: HB
Sulfate	**586**		**2.00**	**5.00**	**mg/L**	10	09-Sep-2025 10:40
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	15-Sep-2025 10:01

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG-WA Parish CCR Resampling		WorkOrder:HS25090251
Sample ID:	MW-62		Lab ID:HS25090251-05
Collection Date:	05-Sep-2025 08:45		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
SUBCONTRACT ANALYSIS - FLOURIDE		**Method:NA**					Analyst: SUBHO
Subcontract Analysis	See Attached		0			1	15-Sep-2025 10:01

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG-WA Parish CCR Resampling		WorkOrder:HS25090251
Sample ID:	MW-37		Lab ID:HS25090251-06
Collection Date:	05-Sep-2025 08:25		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 08-Sep-2025		Analyst: MSC
Boron	**0.481**		**0.00800**	**0.0500**	**mg/L**	1	09-Sep-2025 13:06
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: HB
Sulfate	**1,300**		**4.00**	**10.0**	**mg/L**	20	09-Sep-2025 10:46
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: MC
Total Dissolved Solids (Residue, Filterable)	**2,960**		**3.00**	**10.0**	**mg/L**	1	09-Sep-2025 08:00

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG-WA Parish CCR Resampling		WorkOrder:HS25090251
Sample ID:	MW-38R		Lab ID:HS25090251-07
Collection Date:	05-Sep-2025 09:05		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 08-Sep-2025		Analyst: MSC
Boron	**0.390**		**0.00800**	**0.0500**	**mg/L**	1	09-Sep-2025 13:08
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: HB
Sulfate	**715**		**2.00**	**5.00**	**mg/L**	10	09-Sep-2025 10:52
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: MC
Total Dissolved Solids (Residue, Filterable)	**1,650**		**3.00**	**10.0**	**mg/L**	1	09-Sep-2025 08:00

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG-WA Parish CCR Resampling		WorkOrder:HS25090251
Sample ID:	MW-61R		Lab ID:HS25090251-08
Collection Date:	05-Sep-2025 09:40		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: HB
Sulfate	**659**		**2.00**	**5.00**	**mg/L**	10	09-Sep-2025 10:58
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: MH
Total Dissolved Solids (Residue, Filterable)	**1,940**		**3.00**	**10.0**	**mg/L**	1	10-Sep-2025 11:00

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG-WA Parish CCR Resampling		WorkOrder:HS25090251
Sample ID:	MW-58		Lab ID:HS25090251-09
Collection Date:	05-Sep-2025 10:30		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 08-Sep-2025		Analyst: MSC
Boron	**3.30**		**0.160**	**1.00**	**mg/L**	20	09-Sep-2025 13:34

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG-WA Parish CCR Resampling		WorkOrder:HS25090251
Sample ID:	MW-23R		Lab ID:HS25090251-10
Collection Date:	05-Sep-2025 10:45		Matrix:Water

ANALYSES	RESULT	QUAL	SDL	MQL	UNITS	DILUTION FACTOR	DATE ANALYZED
ICP-MS METALS BY SW6020A		**Method:SW6020A**			Prep:SW3010A / 08-Sep-2025		Analyst: MSC
Calcium	**481**		**12.0**	**50.0**	**mg/L**	100	09-Sep-2025 14:27
ANIONS BY E300.0, REV 2.1, 1993		**Method:E300**					Analyst: HB
Sulfate	**1,530**		**4.00**	**10.0**	**mg/L**	20	09-Sep-2025 11:04
TOTAL DISSOLVED SOLIDS BY SM2540C		**Method:M2540C**					Analyst: MH
Total Dissolved Solids (Residue, Filterable)	**2,360**		**3.00**	**10.0**	**mg/L**	1	10-Sep-2025 11:00
PH BY SW9040C		**Method:SW9040C**					Analyst: CD
pH	**7.03**	H	**0.100**	**1.00**	**pH Units**	1	09-Sep-2025 10:30
Temp Deg C @pH	**20.1**	H	**0**	**0**	**DEG C**	1	09-Sep-2025 10:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Weight / Prep Log

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251

Batch ID: 232601 **Start Date:** 08 Sep 2025 13:30 **End Date:** 08 Sep 2025 13:30
Method: WATER - SW3010A **Prep Code:** 3010A

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS25090251-02		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25090251-04		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25090251-06		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25090251-07		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25090251-09		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25090251-10		10 (mL)	10 (mL)	1	120 plastic HNO3

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: 232601 (0)	**Test Name :** ICP-MS METALS BY SW6020A				**Matrix:** Water	
HS25090251-02	MW-39R	05 Sep 2025 09:25		08 Sep 2025 13:30	09 Sep 2025 13:01	1
HS25090251-04	MW-63	05 Sep 2025 10:25		08 Sep 2025 13:30	09 Sep 2025 13:04	1
HS25090251-06	MW-37	05 Sep 2025 08:25		08 Sep 2025 13:30	09 Sep 2025 13:06	1
HS25090251-07	MW-38R	05 Sep 2025 09:05		08 Sep 2025 13:30	09 Sep 2025 13:08	1
HS25090251-09	MW-58	05 Sep 2025 10:30		08 Sep 2025 13:30	09 Sep 2025 13:34	20
HS25090251-10	MW-23R	05 Sep 2025 10:45		08 Sep 2025 13:30	09 Sep 2025 14:27	100
Batch ID: R521387 (0)	**Test Name :** TOTAL DISSOLVED SOLIDS BY SM2540C				**Matrix:** Water	
HS25090251-06	MW-37	05 Sep 2025 08:25			09 Sep 2025 08:00	1
HS25090251-07	MW-38R	05 Sep 2025 09:05			09 Sep 2025 08:00	1
Batch ID: R521391 (0)	**Test Name :** PH BY SW9040C				**Matrix:** Water	
HS25090251-03	MW-64	05 Sep 2025 08:25			09 Sep 2025 10:30	1
HS25090251-10	MW-23R	05 Sep 2025 10:45			09 Sep 2025 10:30	1
Batch ID: R521498 (0)	**Test Name :** ANIONS BY E300.0, REV 2.1, 1993				**Matrix:** Water	
HS25090251-02	MW-39R	05 Sep 2025 09:25			09 Sep 2025 10:23	10
HS25090251-04	MW-63	05 Sep 2025 10:25			09 Sep 2025 10:40	10
HS25090251-06	MW-37	05 Sep 2025 08:25			09 Sep 2025 10:46	20
HS25090251-07	MW-38R	05 Sep 2025 09:05			09 Sep 2025 10:52	10
HS25090251-08	MW-61R	05 Sep 2025 09:40			09 Sep 2025 10:58	10
HS25090251-10	MW-23R	05 Sep 2025 10:45			09 Sep 2025 11:04	20
Batch ID: R521575 (0)	**Test Name :** TOTAL DISSOLVED SOLIDS BY SM2540C				**Matrix:** Water	
HS25090251-08	MW-61R	05 Sep 2025 09:40			10 Sep 2025 11:00	1
HS25090251-10	MW-23R	05 Sep 2025 10:45			10 Sep 2025 11:00	1
Batch ID: R521710 (0)	**Test Name :** SUBCONTRACT ANALYSIS - FLOURIDE				**Matrix:** Water	
HS25090251-01	MW-41	05 Sep 2025 09:15			15 Sep 2025 10:01	1
HS25090251-03	MW-64	05 Sep 2025 08:25			15 Sep 2025 10:01	1
HS25090251-04	MW-63	05 Sep 2025 10:25			15 Sep 2025 10:01	1
HS25090251-05	MW-62	05 Sep 2025 08:45			15 Sep 2025 10:01	1

WorkOrder: HS25090251
InstrumentID: ICPMS07
Test Code: ICP_TW
Test Number: SW6020A
Test Name: ICP-MS Metals by SW6020A

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Boron	7440-42-8	0.0250	0.0229	0.00800	0.0500
A	Calcium	7440-70-2	0.250	0.244	0.120	0.500

WorkOrder: HS25090251
InstrumentID: Subcontract
Test Code: Sub_Flouride
Test Number: NA
Test Name: Subcontract Analysis - Flouride

METHOD DETECTION / REPORTING LIMITS

Matrix: **Units:**

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Subcontract Analysis		0	0	0	0

WorkOrder: HS25090251
InstrumentID: ICS-Integrion
Test Code: 300_W
Test Number: E300
Test Name: Anions by E300.0, Rev 2.1, 1993

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Sulfate	14808-79-8	0.250	0.328	0.200	0.500

WorkOrder:	HS25090251
InstrumentID:	WetChem_HS
Test Code:	pH_W_9040C
Test Number:	SW9040C
Test Name:	pH by SW9040C

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** pH Units

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	pH	PH	0	0	0.100	1.00
A	Temp Deg C @pH	TEMP	0	0	0	0

WorkOrder: HS25090251
InstrumentID: Balance1
Test Code: TDS_W 2540C
Test Number: M2540C
Test Name: Total Dissolved Solids by SM2540C

METHOD DETECTION / REPORTING LIMITS

Matrix: Aqueous **Units:** mg/L

Type	Analyte	CAS	DCS Spike	DCS	MDL	PQL
A	Total Dissolved Solids (Residue, Filterable)	TDS	6.00	6.00	3.00	10.0

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251

QC BATCH REPORT

Batch ID: 232601 (0) **Instrument:** ICPMS07 **Method:** ICP-MS METALS BY SW6020A

MBLK Sample ID: **MBLK-232601** Units: **mg/L** Analysis Date: **09-Sep-2025 10:11**
Client ID: Run ID: **ICPMS07_521355** SeqNo: **9022716** PrepDate: **08-Sep-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	< 0.00800	0.0500								
Calcium	< 0.120	0.500								

LCS Sample ID: **LCS-232601** Units: **mg/L** Analysis Date: **09-Sep-2025 11:05**
Client ID: Run ID: **ICPMS07_521355** SeqNo: **9022875** PrepDate: **08-Sep-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	0.4893	0.0500	0.5	0	97.9	80 - 120				
Calcium	5.171	0.500	5	0	103	80 - 120				

MS Sample ID: **HS25090224-01MS** Units: **mg/L** Analysis Date: **09-Sep-2025 12:42**
Client ID: Run ID: **ICPMS07_521355** SeqNo: **9023120** PrepDate: **08-Sep-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	1.775	0.0500	0.5	1.288	97.4	80 - 120				E
Calcium	27.35	0.500	5	23.41	78.9	80 - 120				SO

MSD Sample ID: **HS25090224-01MSD** Units: **mg/L** Analysis Date: **09-Sep-2025 12:44**
Client ID: Run ID: **ICPMS07_521355** SeqNo: **9023121** PrepDate: **08-Sep-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	1.798	0.0500	0.5	1.288	102	80 - 120	1.775	1.33	20	E
Calcium	26.72	0.500	5	23.41	66.2	80 - 120	27.35	2.34	20	SO

PDS Sample ID: **HS25090224-01PDS** Units: **mg/L** Analysis Date: **09-Sep-2025 13:32**
Client ID: Run ID: **ICPMS07_521355** SeqNo: **9023230** PrepDate: **08-Sep-2025** DF: **20**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	10.55	1.00	10	1.36	91.9	75 - 125				

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251

QC BATCH REPORT

Batch ID: 232601 (0) **Instrument:** ICPMS07 **Method:** ICP-MS METALS BY SW6020A

PDS Sample ID: **HS25090224-01PDS** Units: **mg/L** Analysis Date: **09-Sep-2025 12:47**
Client ID: Run ID: **ICPMS07_521355** SeqNo: **9023122** PrepDate: **08-Sep-2025** DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Calcium	32.16	0.500	10	23.41	87.5	75 - 125				

SD Sample ID: **HS25090224-01SD** Units: **mg/L** Analysis Date: **09-Sep-2025 13:30**
Client ID: Run ID: **ICPMS07_521355** SeqNo: **9023229** PrepDate: **08-Sep-2025** DF: **100**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Boron	2.057	5.00					1.36	0	10	J

SD Sample ID: **HS25090224-01SD** Units: **mg/L** Analysis Date: **09-Sep-2025 12:40**
Client ID: Run ID: **ICPMS07_521355** SeqNo: **9023119** PrepDate: **08-Sep-2025** DF: **5**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Calcium	22.26	2.50					23.41	4.93	10	

The following samples were analyzed in this batch:

HS25090251-02	HS25090251-04	HS25090251-06	HS25090251-07
HS25090251-09	HS25090251-10		

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251

QC BATCH REPORT

Batch ID: R521387 (0) **Instrument:** Balance1 **Method:** TOTAL DISSOLVED SOLIDS BY SM2540C

MBLK Sample ID: **WMBLK-09092025** Units: **mg/L** Analysis Date: **09-Sep-2025 08:00**
Client ID: Run ID: **Balance1_521387** SeqNo: **9023315** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	< 3.00	10.0								

LCS Sample ID: **WLCS-09092025** Units: **mg/L** Analysis Date: **09-Sep-2025 08:00**
Client ID: Run ID: **Balance1_521387** SeqNo: **9023314** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	974	10.0	1000	0	97.4	85 - 115				

DUP Sample ID: **HS25090253-11DUP** Units: **mg/L** Analysis Date: **09-Sep-2025 08:00**
Client ID: Run ID: **Balance1_521387** SeqNo: **9023309** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	3030	10.0					3070	1.31	20	

DUP Sample ID: **HS25090251-07DUP** Units: **mg/L** Analysis Date: **09-Sep-2025 08:00**
Client ID: **MW-38R** Run ID: **Balance1_521387** SeqNo: **9023303** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	1668	10.0					1652	0.964	20	

The following samples were analyzed in this batch: HS25090251-06 HS25090251-07

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251

QC BATCH REPORT

Batch ID: **R521391 (0)** **Instrument:** **WetChem_HS** **Method:** **PH BY SW9040C**

DUP Sample ID: **HS25090251-03DUP** Units: **pH Units** Analysis Date: **09-Sep-2025 10:30**
Client ID: **MW-64** Run ID: **WetChem_HS_521391** SeqNo: **9023239** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
pH	7.03	1.00					6.99	0.571	10	
Temp Deg C @pH	20.4	0					20.4	0	10	

The following samples were analyzed in this batch: HS25090251-03 HS25090251-10

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251

QC BATCH REPORT

Batch ID: R521498 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY E300.0, REV 2.1, 1993

MBLK Sample ID: **MBLK** Units: **mg/L** Analysis Date: **09-Sep-2025 10:05**
Client ID: Run ID: **ICS-Integrion_521498** SeqNo: **9025244** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	< 0.200	0.500								

LCS Sample ID: **LCS** Units: **mg/L** Analysis Date: **09-Sep-2025 10:17**
Client ID: Run ID: **ICS-Integrion_521498** SeqNo: **9025245** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	19.64	0.500	20	0	98.2	90 - 110				

MS Sample ID: **HS25090251-02MS** Units: **mg/L** Analysis Date: **09-Sep-2025 10:29**
Client ID: **MW-39R** Run ID: **ICS-Integrion_521498** SeqNo: **9025247** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	391.2	5.00	100	311.3	79.9	80 - 120				S

MSD Sample ID: **HS25090251-02MSD** Units: **mg/L** Analysis Date: **09-Sep-2025 10:34**
Client ID: **MW-39R** Run ID: **ICS-Integrion_521498** SeqNo: **9025248** PrepDate: DF: **10**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Sulfate	389.5	5.00	100	311.3	78.2	80 - 120	391.2	0.44	20	S

The following samples were analyzed in this batch:

HS25090251-02	HS25090251-04	HS25090251-06	HS25090251-07
HS25090251-08	HS25090251-10		

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251

QC BATCH REPORT

Batch ID: R521575 (0) **Instrument:** Balance1 **Method:** TOTAL DISSOLVED SOLIDS BY SM2540C

MBLK Sample ID: **WMBLK-09102025** Units: **mg/L** Analysis Date: **10-Sep-2025 11:00**
Client ID: Run ID: **Balance1_521575** SeqNo: **9026865** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	< 3.00	10.0								

LCS Sample ID: **WLCS-09102025** Units: **mg/L** Analysis Date: **10-Sep-2025 11:00**
Client ID: Run ID: **Balance1_521575** SeqNo: **9026864** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	900	10.0	1000	0	90.0	85 - 115				

DUP Sample ID: **HS25090353-01DUP** Units: **mg/L** Analysis Date: **10-Sep-2025 11:00**
Client ID: Run ID: **Balance1_521575** SeqNo: **9026860** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	474	10.0					484	2.09	20	

DUP Sample ID: **HS25090311-05DUP** Units: **mg/L** Analysis Date: **10-Sep-2025 11:00**
Client ID: Run ID: **Balance1_521575** SeqNo: **9026846** PrepDate: DF: **1**

Analyte	Result	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Total Dissolved Solids (Residue, Filterable)	266	10.0					270	1.49	20	

The following samples were analyzed in this batch: HS25090251-08 HS25090251-10

Client: TRC
Project: NRG-WA Parish CCR Resampling
WorkOrder: HS25090251

QUALIFIERS, ACRONYMS, UNITS

Qualifier	Description
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte detected below quantitation limit
M	Manually integrated, see raw data for justification
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL/SDL

Acronym	Description
DCS	Detectability Check Study
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitaion Limit
SD	Serial Dilution
SDL	Sample Detection Limit
TRRP	Texas Risk Reduction Program

CERTIFICATIONS,ACCREDITATIONS & LICENSES

Agency	Number	Expire Date
Arizona	AZ0793	27-May-2026
Arkansas	88-00356_2024	17-Mar-2026
California	2919 - 2025	30-Apr-2026
Dept of Defense	L24-240	30-Apr-2026
Dept of Defense	L24-239	30-Apr-2026
Florida	E87611-2025	30-Jun-2026
Illinois	200032 - 2025	31-Jul-2026
Kansas	KS-C25-00168	31-Jul-2026
Kentucky	123043-2025	30-Apr-2026
Louisiana	03087-2025	30-Jun-2026
Maine	2024017	23-Jun-2026
Michigan	9971-2025	30-Apr-2026
Minnesota	2856348	31-Dec-2025
Missouri	136	30-Sep-2026
Nebraska	NE-OS-25-13 - 2025	30-Apr-2026
Nevada	NV-C25-00124 - 2025	31-Jul-2026
New Hampshire	209425	24-Apr-2026
New Jersey	TX008-2025	30-Jun-2026
New York	11707 - 2025	01-Apr-2026
North Carolina	624 - 2024	31-Dec-2025
North Dakota	R-193 2023-2024	30-Sep-2025
Oregon	TX200002-013	15-May-2026
Pennsylvania	019	01-Jul-2026
Tennessee	TN	30-Apr-2026
Texas	TX-C25-00104	30-Apr-2026

Sample Receipt Checklist

Work Order ID:	HS25090251	**Date/Time Received:**	**05-Sep-2025 12:10**
Client Name:	TRC-HOU	**Received by:**	**Paresh M. Giga**

Completed By:	/S/ Si Ma	05-Sep-2025 19:59	**Reviewed by:** /S/ Rochelle Davis	08-Sep-2025 14:58
	eSignature	Date/Time	eSignature	Date/Time

Matrices: **WATER** Carrier name: **Client**

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on shipping container/cooler?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
VOA/TX1005/TX1006 Solids in hermetically sealed vials?	Yes ☐	No ☐	Not Present ☑
Chain of custody present?	Yes ☑	No ☐	2 Page(s)
Chain of custody signed when relinquished and received?	Yes ☑	No ☐	COC IDs:348347 / 348346
Samplers name present on COC?	Yes ☑	No ☐	
Chain of custody agrees with sample labels?	Yes ☑	No ☐	
Samples in proper container/bottle?	Yes ☑	No ☐	
Sample containers intact?	Yes ☑	No ☐	
Sufficient sample volume for indicated test?	Yes ☑	No ☐	
All samples received within holding time?	Yes ☑	No ☐	
Container/Temp Blank temperature in compliance?	Yes ☑	No ☐	
Temperature(s)/Thermometer(s):	1.5UC/1.5C		IR37
Cooler(s)/Kit(s):	BLUE		
Date/Time sample(s) sent to storage:	09/05/2025 20:00		
Water - VOA vials have zero headspace?	Yes ☐	No ☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	Yes ☑	No ☐	N/A ☐
pH adjusted?	Yes ☐	No ☑	N/A ☐
pH adjusted by:			

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

Corrective Action:

ALS

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Everett, WA +1 425 356 2600
Holland, MI +1 616 399 6070

Chain of Custody Form

Page 1 of 2

COC ID: 348347

HS25090251
TRC
NRG-WA Parish CCR Ressampling

ALS Project Manager:

Customer Information		Project Information			
Purchase Order	227701	Project Name	NRG - WA Parish CCR Ressampling	A	300_W (Cl, SO4)
Work Order		Project Number	528472.0000.0000	B	300_W (SO4)
Company Name	TRC Corporation	Bill To Company	TRC	C	6020-B
Send Report To	Lori Burris	Invoice Attn	A/P	D	6020-B, Ca
Address	14701 St. Mary's Lane Suite 500	Address	11767 Katy Freeway Suite 850	E	6020-Ca
				F	Sub_Fluoride (Sub Fluoride to ALS Michigan)
City/State/Zip	Houston, TX 77079	City/State/Zip	Houston TX 77079	G	TDS_W 2540C (TDS)
Phone	(713) 244-1000	Phone	(713) 244-1000	H	pH_W_9040C
Fax	(713) 244-1099	Fax	(713) 244-1099	I	
e-Mail Address	LBurris@trcsolutions.com	e-Mail Address	apinvoiceapproval@trcsolutions.com	J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	MW-41	9-5-25	915	Water	2,8	3						X					
2	~~MW-40~~			~~Water~~	~~2,8~~	~~3~~								X	BRH		
3	MW-39R	9-5-25	925	Water	2,8	3		X	X								
4	MW-64		825	Water	2,8	3						X		X			
5	MW-63		1025	Water	2,8	3		X	X			X					
6	MW-62		845	Water	2,8	3						X					
7	MW-37		825	Water	2,8	3		X	X				X				
8	MW-38R		905	Water	2,8	3		X	X				X				
9	MW-61R		940	Water	2,8	3		X					X				
10	~~MW-28D~~			~~Water~~	~~2,8~~	~~3~~								X	BRH		

Sampler(s) Please Print & Sign: Cody Springer/HM Team /

Shipment Method: Consult. Drop off

Required Turnaround Time: (Check Box) ☐ Other ____ ☐ STD 10 Wk Days ☒ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour

Results Due Date:

Relinquished by: JACOB DUNLAP | Date: 9-5-25 | Time: 1210 | Received by:

Relinquished by: | Date: | Time: | Received by (Laboratory):

Logged by (Laboratory): | Date: | Time: | Checked by (Laboratory):

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

Notes: NRG WA Parish - PRIVILEGED & CONFIDENTIAL

Cooler ID	Cooler Temp.
[illegible]	[illegible]

QC Package: (Check One Box Below)
☐ Level II Std QC ☒ TRRP Checklist
☐ Level III Std QC/Raw Data ☐ TRRP Level IV
☐ Level IV SW846/CLP
☐ Other ____

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited to the terms and conditions stated on the reverse.
3. The Chain of Custody is a legal document. All information must be completed accurately.

Cincinnati, OH +1 513 733 5336
Everett, WA +1 425 356 2600
Fort Collins, CO +1 970 490 1511
Holland, MI +1 616 399 6070

Chain of Custody Form

Page 2 of 2

COC ID: 348346

HS25090251
TRC
NRG-WA Parish CCR Ressampling

ALS Project Manager:

Customer Information		Project Information	
Purchase Order	227701	Project Name	NRG - WA Parish CCR Ressampling
Work Order		Project Number	528472.0000.0000
Company Name	TRC Corporation	Bill To Company	TRC
Send Report To	Lori Burris	Invoice Attn	A/P
Address	14701 St. Mary's Lane Suite 500	Address	11767 Katy Freeway Suite 850
City/State/Zip	Houston, TX 77079	City/State/Zip	Houston TX 77079
Phone	(713) 244-1000	Phone	(713) 244-1000
Fax	(713) 244-1099	Fax	(713) 244-1099
e-Mail Address	LBurris@trcsolutions.com	e-Mail Address	apinvoiceapproval@trcsolutions.com

A	300_W (Cl, SO4)
B	300_W (SO4)
C	6020-B
D	6020-B, Ca
E	6020-Ca
F	Sub_Fluoride (Sub Fluoride to ALS Michigan)
G	TDS_W 2540C (TDS)
H	pH_W_9040C
I	
J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	MW-58	9-5-25	1030	Water	2,8	3			X								
2	MW-23R	↓	1045	Water	2,8	3		X			X		X	X			
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign: Cody Springer & HMI Team /

Shipment Method: Courier Drop off

Required Turnaround Time: (Check Box) ☐ Other ____ ☐ STD 10 Wk Days ☒ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour

Results Due Date:

Relinquished by: JACOB DUNLAP Date: 9.5.25 Time: 1210 Received by:

Relinquished by: Date: Time: Received by (Laboratory): 9/5/25 1210

Logged by (Laboratory): Date: Time: Checked by (Laboratory):

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

Notes: NRG WA Parish - PRIVILEGED & CONFIDENTIAL

Cooler ID	Cooler Temp.

QC Package: (Check One Box Below)
☐ Level II Std QC
☐ Level II Std QC/Raw Data
☐ Level IV SW846/CLP
☐ Other ____
☒ TRRP Checklist
☐ TRRP Level IV

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited to the terms and conditions stated on the reverse.
3. The Chain of Custody is a legal document. All information must be completed accurately.

Privileged and Confidential

ALS
10450 Stancliff Rd., Suite 210
Houston, Texas 77099
Tel. +1 281 530 5656
Fax. +1 281 530 5887

CUSTODY SEAL

Date: Time:
Name:
Company:

Seal Broken By:
Date: 09/05/25

SEP 0 5 2025 SEP 0 5 2025

Privileged and Confidential

15-Sep-2025

Andrew Neir
ALS Environmental
10450 Stancliff Rd
Suite 210
Houston, TX 77099

Re: **HS25090251** Work Order: **25090050**

Dear Andrew,

ALS Environmental received 4 samples on 10-Sep-2025 10:00 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental - Holland and for only the analyses requested.

Sample results are compliant with industry accepted practices and Quality Control results achieved laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 17.

If you have any questions regarding this report, please feel free to contact me:

ADDRESS: 3352 128th Avenue, Holland, MI, USA
PHONE: +1 (616) 399-6070 FAX: +1 (616) 399-6185

Sincerely,

Chelsey Cook

Electronically approved by: Chelsey Cook

Chelsey Cook
Project Manager

Report of Laboratory Analysis

Certificate No: TX: T104704494

ALS Group, USA

Date: *15-Sep-25*

Client: ALS Environmental
Project: HS25090251
Work Order: 25090050

TRRP Laboratory Data Package Cover Page

This data package consists of all or some of the following as applicable:

This signature page, the laboratory case narrative, and the following reportable data:

R1 Field chain-of-custody documentation:
R2 Sample identification cross-reference
R3 Test reports (analytical data sheets) for each environmental sample that includes:
- a) Items consistent with NELAC Chapter 5
- b) dilution factors,
- c) preparation methods,
- d) cleanup methods, and
- e) if required for the project, tentatively identified compounds (TICs).

R4 Surrogate recovery data including:
- a) Calculated recovery (%R), and
- b) The laboratory's surrogate QC limits.

R5 Test reports/summary forms for blank samples;
R6 Test reports/summary forms for laboratory control samples (LCSs) including:
- a) LCS spiking amounts,
- b) Calculated %R for each analyte, and
- c) The laboratory's LCS QC limits.

R7 Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
- a) Samples associated with the MS/MSD clearly identified,
- b) MS/MSD spiking amounts,
- c) Concentration of each MS/MSD analyte measured in the parent and spiked samples,
- d) Calculated %Rs and relative percent differences (RPDs), and
- e) The laboratory's MS/MSD QC limits

R8 Laboratory analytical duplicate (if applicable) recovery and precision:
- a) the amount of analyte measured in the duplicate,
- b) the calculated RPD, and
- c) the laboratory's QC limits for analytical duplicates.

R9 List of method quantitation limits (MQLs) for each analyte for each method and matrix;
R10 Other problems or anomalies:
See Case Narrative.

Release Statement: I am responsible for the release of this laboratory data package. This data package has been reviewed by the laboratory and is complete and technically compliant with the requirements of the methods used, except where noted by the laboratory in the attached Case Narrative and QC Summaries. By my signature below, I affirm to the best of my knowledge, all problems/anomalies, observed by the laboratory as having the potential to affect the quality of the data, have been identified, and no information affecting the quality of the data has been knowingly withheld.

Chelsey Cook

Chelsey Cook
Project Manager

Privileged and Confidential

WET CHEMISTRY DATA ASSESSMENT CHECKLIST

Wet Chemistry		Batch Number: TITRATOR 1_250911B			Instrument ID: TITRATOR1		
Method: FL_4500C_W		Work order Number (s): 25090050					
Analyst Name: KB		Date: 09/11/25	Reviewer Name: RM			Date: 9/12/25	

	A[1]	Description	Yes	No	NA[2]	NR[3]	ER#[4]
R1	I	Chain-of-Custody					
		1) Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?			X		
		2) Were all departures from standard conditions described in an exception report?			X		
R2	I	**SAMPLE AND QUALITY CONTROL (QC) IDENTIFICATION**					
		1) Are all field sample ID numbers cross-referenced to the laboratory ID numbers?			X		
		2) Are all laboratory ID numbers cross-referenced to the corresponding QC data?			X		
R3	I	**TEST REPORTS**					
		1) Were all samples prepared and analyzed within holding times?	X				
		2) Other than those results < MQL, were all other raw values bracketed by calibration standards?	X				
		3) Were calculations checked by a peer or supervisor?	X				
		4) Were all analyte identifications checked by a peer or supervisor?	X				
		5) Were sample quantitation limits reported for all analytes not detected?	X				
		6) Were all results for soil and sediment samples reported on a dry weight basis?			X		
		7) Was % moisture (or solids) reported for all soil and sediment samples?			X		
		8) If required for the project, TICs reported?			X		
R4	I	**SURROGATE RECOVERY DATA**					
		1) Were surrogates added prior to extraction?			X		
		2) Were surrogate percent recoveries in all samples within the laboratory QC limits?			X		
R5	I	**TEST REPORTS/SUMMMARY FORMS FOR BLANK SAMPLES**					
		1) Were appropriate type(s) of blanks analyzed?	X				
		2) Were blanks analyzed at the appropriate frequency?	X				
		3) Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X				
		4) Were blank concentrations < ½ MQL?	X				
R6	I	**LABORATORY CONTROL SAMPLES (LCS):**					
		1) Were all COCs included in the LCS?	X				
		2) Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X				
		3) Were LCSs analyzed at the required frequency?	X				
		4) Were LCS and LCSD %Rs within the laboratory QC limits?	X				
		5) Does the detectability data document the laboratory's capability to detect the COCs at the MDL used to calculate the SQLs?	X				
		6) Was the LCSD RPD within QC limits?	X				
R7	I	**MATRIX SPIKE (MS) AND MATRIX SPIKE DUPLICATE (MSD) DATA**					
		1) Were the project or method specified analytes included in the MS and MSD?	X				
		2) Were MS/MSD analyzed at the appropriate frequency?	X				
		3) Were MS and MSD %Rs within the laboratory QC limits?	X				
		4) Were MS/MSD RPDs within laboratory QC limits?	X				
R8	I	**ANALYTICAL DUPLICATE DATA (IF REQUIRED)**					
		1) Were appropriate analytical duplicates analyzed for each matrix?	X				
		2) Were analytical duplicates analyzed at the appropriate frequency?	X				
		3) Were RPDs or relative standard deviations within the laboratory QC limits?	X				
R9	I	**METHOD QUANTITATION LIMITS (MQLS):**					
		1) Are the MQLs for each method analyte listed and included in the laboratory data package?	X				
		2) Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X				
		3) Are unadjusted MQLs included in the laboratory data package?			X		
R10	I	**OTHER PROBLEMS/ANOMALIES**					
		1) Are all known problems/anomalies/special conditions noted in this LRC and ER?	X				
		2) Were all necessary corrective actions performed for the reported data?	X				
		3) If requested, is the justification for elevated SQLs documented?			X		

S1	I	**INITIAL CALIBRATION (ICAL)**					
		1) Were response factors (RFs) and/or relative response factors (RRFs) for each analyte within the QC limits?			X		
		2) Were percent RSDs or correlation coefficient criteria met?	X				
		3) Was the number of standards recommended in the method used for all analytes?	X				
		4) Were all points generated between the lowest and highest standard used to calculate the curve?	X				
		5) Are ICAL data available for all instruments used?	X				
		6) Has the initial calibration curve been verified using an appropriate second source standard?	X				
S2	I	**INITIAL AND CONTINUING CALIBRATION VERIFICATION (ICCV AND CCV) AND**					
		1) Was the CCV analyzed at the method-required frequency?	X				
		2) Were percent differences for each analyte within the method-required QC limits?	X				
		3) Was the ICAL curve verified for each analyte?	X				
		4) Was the absolute value of the analyte concentration in the organic CCB < MDL?	X				
S3	I	**MASS SPECTRAL TUNING:**					
		1) Was the appropriate compound for the method used for tuning?			X		
		2) Were ion abundance data within the method-required QC limits?			X		
S4	I	**INTERNAL STANDARDS (IS):**					
		Were IS area counts within the method-required QC limits?			X		
S5	I	**RAW DATA**					
		1) Were the raw data (e.g., chromatograms, spectral data) reviewed by an analyst?	X				
		2) Were data associated with manual integrations flagged on the raw data?	X				
S6	I	**DUAL COLUMN CONFIRMATION (IF REQUIRED)**					
		Did dual column confirmation results meet the method-required QC?			X		
S7	I	**TENTATIVELY IDENTIFIED COMPOUNDS (TICS):**					
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X		
S8	I	**INTERFERENCE CHECK SAMPLE (ICS) RESULTS:**					
		Were percent recoveries within method QC limits?			X		
S9	I	**SERIAL DILUTIONS, POST DIGESTION SPIKES, AND METHOD OF STANDARD**					
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?			X		
S10	I	**PROFICIENCY TEST REPORTS:**					
		Are proficiency testing or inter-laboratory comparison results on file?	X				
S11	I	**METHOD DETECTION LIMIT (MDL) STUDIES**					
		1) Was a MDL study performed for each reported analyte?	X				
		2) Is the MDL either adjusted or supported by the analysis of DCSs?	X				
S12	I	**STANDARDS DOCUMENTATION**					
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X				
S13	I	**COMPOUND/ANALYTE IDENTIFICATION PROCEDURES**					
		Are the procedures for compound/analyte identification documented?	X				
S14	I	**DEMONSTRATION OF ANALYST COMPETENCY (DOC)**					
		1) Was DOC conducted consistent with NELAC 5C or ISO/IEC 4.2.2?	X				
		2) Is documentation of the analyst's competency up-to-date and on file?	X				
S15	I	**VERIFICATION/VALIDATION DOCUMENTATION FOR METHODS**					
		Are all the methods used to generate the data documented, verified, and validated, where applicable, (NELAC 5.10.2 or ISO/IEC 17025 Section 5.4.5)?	X				
S16	I	**LABORATORY STANDARD OPERATING PROCEDURES (SOPS):**					
		Are laboratory SOPs current and on file for each method performed?	X				

1 O = organic analyses; I = inorganic analyses (and general chemistry, when applicable).
2 NA = Not applicable.
3 NR = Not Reviewed.
4 ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

WET CHEMISTRY DATA ASSESSMENT CHECKLIST		
Wet Chemistry	Batch Number:	

ER #[1]	DESCRIPTION
1	
2	
3	
4	
5	
6	

1 ER# = Exception Report identification number (an Exception Report should be completed for an item if “NR” or “No” is checked on the LRC)

ALS Group, USA

Date: 15-Sep-25

Client: ALS Environmental
Project: HS25090251
Work Order: **25090050**

Work Order Sample Summary

Lab Samp ID	Client Sample ID	Matrix	Tag Number	Collection Date	Date Received	Hold
25090050-01	HS25090251-01	Water		9/5/2025 09:15	9/10/2025 10:00	☐
25090050-02	HS25090251-03	Water		9/5/2025 08:25	9/10/2025 10:00	☐
25090050-03	HS25090251-04	Water		9/5/2025 10:25	9/10/2025 10:00	☐
25090050-04	HS25090251-05	Water		9/5/2025 08:45	9/10/2025 10:00	☐

ALS Group, USA

Date: 15-Sep-25

Client: ALS Environmental
Project: HS25090251
WorkOrder: **25090050**

QUALIFIERS, ACRONYMS, UNITS

Qualifier	Description
*	Value exceeds Regulatory Limit
**	Estimated Value
a	Analyte is non-accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
Hr	BOD/CBOD - Sample was reset outside Hold Time, value should be considered estimated.
J	Analyte is present at an estimated concentration between the MDL and Report Limit
n	Analyte accreditation is not offered
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL
X	Analyte was detected in the Method Blank between the MDL and Reporting Limit, sample results may exhibit background or reagent contamination at the observed level.

Acronym	Description
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
LOD	Limit of Detection (see MDL)
LOQ	Limit of Quantitation (see PQL)
MBLK	Method Blank
MDL	Method Detection Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PQL	Practical Quantitation Limit
RPD	Relative Percent Difference
TDL	Target Detection Limit
TNTC	Too Numerous To Count
A	APHA Standard Methods
D	ASTM
E	EPA
SW	SW-846 Update III

Units Reported	Description
mg/L	Milligrams per Liter

Client:	ALS Environmental
Project:	HS25090251
Work Order:	25090050

Case Narrative

Samples for the above noted Work Order were received on 09/10/2025. The attached "Sample Receipt Checklist" documents the status of custody seals, container integrity, preservation, and temperature compliance.

Samples were analyzed according to the analytical methodology previously transmitted in the "Work Order Acknowledgement". Methodologies are also documented in the "Analytical Result" section for each sample. Quality control results are listed in the "QC Report" section. Sample association for the reported quality control is located at the end of each batch summary. If applicable, results are appropriately qualified in the Analytical Result and QC Report sections. The "Qualifiers" section documents the various qualifiers, units, and acronyms utilized in reporting. A copy of the laboratory's scope of accreditation is available upon request.

With the following exceptions, all sample analyses achieved analytical criteria.

Wet Chemistry:
No deviations or anomalies were noted.

Work Order: 25090050
Client: ALS Environmental
Project: HS25090251

DATES REPORT

Sample ID	Client Sample ID	Matrix	Collection Date	TCLP Date	Prep Date	Analysis Date

Batch ID R423851 **Test Name:** Fluoride

Sample ID	Client Sample ID	Matrix	Collection Date	TCLP Date	Prep Date	Analysis Date
25090050-01 ^	HS25090251-01	Water	9/5/2025 9:15:00 AM			9/11/2025 02:28 PM
25090050-02 ^	HS25090251-03		9/5/2025 8:25:00 AM			9/11/2025 02:28 PM
25090050-03 ^	HS25090251-04		9/5/2025 10:25:00 AM			9/11/2025 02:28 PM
25090050-04 ^	HS25090251-05		9/5/2025 8:45:00 AM			9/11/2025 02:28 PM

ALS Group, USA

Date: *15-Sep-25*

Client: ALS Environmental
Project: HS25090251
Sample ID: HS25090251-01
Collection Date: 9/5/2025 09:15 AM

Work Order: 25090050
Lab ID: 25090050-01
Matrix: WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **KLB**
Fluoride	**0.250**		**0.058**	**0.10**	**mg/L**	1	9/11/2025 14:28

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *15-Sep-25*

Client:	ALS Environmental		
Project:	HS25090251	**Work Order:**	25090050
Sample ID:	HS25090251-03	**Lab ID:**	25090050-02
Collection Date:	9/5/2025 08:25 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE		Method: **A4500-F C-11**					Analyst: **KLB**
Fluoride	**0.330**		**0.058**	**0.10**	**mg/L**	1	9/11/2025 14:28

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: *15-Sep-25*

Client:	ALS Environmental		
Project:	HS25090251	**Work Order:**	25090050
Sample ID:	HS25090251-04	**Lab ID:**	25090050-03
Collection Date:	9/5/2025 10:25 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **KLB**
Fluoride	**0.240**		**0.058**	**0.10**	**mg/L**	1	9/11/2025 14:28

Note: See Qualifiers page for a list of qualifiers and their definitions.

Client:	ALS Environmental		
Project:	HS25090251	**Work Order:**	25090050
Sample ID:	HS25090251-05	**Lab ID:**	25090050-04
Collection Date:	9/5/2025 08:45 AM	**Matrix:**	WATER

Analyses	Result	Qual	SDL	MQL	Units	Dilution Factor	Date Analyzed
FLUORIDE			Method: **A4500-F C-11**				Analyst: **KLB**
Fluoride	**0.200**		**0.058**	**0.10**	**mg/L**	1	9/11/2025 14:28

Note: See Qualifiers page for a list of qualifiers and their definitions.

ALS Group, USA

Date: 15-Sep-25

WorkOrder: 25090050
InstrumentID: Titrator 1
Test Code: FL_4500C_W
Test Number: A4500-F C-11
Test Name: Fluoride

METHOD DETECTION / REPORTING LIMITS

Matrix: Water **Units:** mg/L

Type	Analyte	CAS	DCS	MDL	Unadjusted MQL
A	Fluoride	16984-48-8	0	0.058	0.10

Client: ALS Environmental
Work Order: 25090050
Project: HS25090251

QC BATCH REPORT

Batch ID: **R423851** Instrument ID **Titrator 1** Method: **A4500-F C-11**

MBLK Sample ID: **MB-R423851-R423851** Units: **mg/L** Analysis Date: **9/11/2025 02:28 PM**

Client ID: Run ID: **TITRATOR 1_250911B** SeqNo: **11614198** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	U	0.058	0.10								

LCS Sample ID: **LCS-R423851-R423851** Units: **mg/L** Analysis Date: **9/11/2025 02:28 PM**

Client ID: Run ID: **TITRATOR 1_250911B** SeqNo: **11614199** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5	0.058	0.10	5	0	100	90-111	0			

MS Sample ID: **25090050-01A MS** Units: **mg/L** Analysis Date: **9/11/2025 02:28 PM**

Client ID: **HS25090251-01** Run ID: **TITRATOR 1_250911B** SeqNo: **11614203** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.39	0.058	0.10	5	0.25	103	90-111	0			

MSD Sample ID: **25090050-01A MSD** Units: **mg/L** Analysis Date: **9/11/2025 02:28 PM**

Client ID: **HS25090251-01** Run ID: **TITRATOR 1_250911B** SeqNo: **11614204** Prep Date: DF: **1**

Analyte	Result	MDL	MQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Fluoride	5.5	0.058	0.10	5	0.25	105	90-111	5.39	2.02	20	

The following samples were analyzed in this batch:

25090050-01A	25090050-02A	25090050-03A
25090050-04A		

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

25090050

ALS - HOUSTON: ALS Environmental
Project: HS25090251

Telephone : +1 616 399 6070

450 Stancliff Rd, Ste 210
uston, TX 77099
+1 281 530 5656
+1 281 530 5887
vw.alsglobal.com

SAMPLING STATE: Texas

COC ID: 29409

SUBCONTRACT TO:

ALS Group USA, Corp.
3352 - 128th Ave
Holland, MI 494249263

Phone: +1 616 399 6070

CUSTOMER INFORMATION:

Company:	ALS Houston
Contact:	Andy C. Neir
Address:	10450 Stancliff Rd, Ste 210
Phone:	+1 281 530 5656
Email:	Andrew.Neir@ALSGlobal.com
Alternate Contact:	Jumoke M. Lawal
Email:	jumoke.lawal@alsglobal.com

INVOICE INFORMATION:

Company:	ALS Houston
Contact:	Accounts Payable
Address:	10450 Stancliff Rd, Ste 210
Phone:	+1 281 530 5656
Reference:	HS25090251
TSR:	Ron Martino

	LAB SAMPLE ID / ANALYSIS REQUESTED	CLIENT SAMPLE ID	MATRIX	COLLECT DATE / DUE DATE
1.	**HS25090251-01**	**MW-41**	**Water**	**05 Sep 2025 09:15**
	Fluoride by ISE 4500. EQuis EDD			09 Sep 2025
2.	**HS25090251-03**	**MW-64**	**Water**	**05 Sep 2025 08:25**
	Fluoride by ISE 4500. EQuis EDD			09 Sep 2025
3.	**HS25090251-04**	**MW-63**	**Water**	**05 Sep 2025 10:25**
	Fluoride by ISE 4500. EQuis EDD			09 Sep 2025
4.	**HS25090251-05**	**MW-62**	**Water**	**05 Sep 2025 08:45**
	Fluoride by ISE 4500. EQuis EDD			09 Sep 2025

Comments: Please analyze for the analysis listed above.
Send report to the emails shown above.

QC Level: TRRP LRC (TRRP checklist only+Level II (normal))

Relinquished By:		Date/Time:	9/8/25 1800
Received By:	Fedex to Brittany Haywood	Date/Time:	9/10/25 10:00
Cooler ID(s):	Logged BH 9/10/25 14:48	Temperature(s):	1R7 3.8c

ALS Group, USA
Holland, Michigan

Sample Receipt Checklist

Client Name: **ALS - HOUSTON**
Date/Time Received: **10-Sep-25 10:00**

Work Order: **25090050**
Received by: **BYH**

Checklist completed by: Brittany Hayward (eSignature) — Date: 10-Sep-25
Reviewed by: Chelsey Cook (eSignature) — Date: 12-Sep-25

Matrices: WATER
Carrier name: FedEx

	Yes	No	Not Present
Shipping container/cooler in good condition?	☑	☐	☐
Custody seals intact on shipping container/cooler?	☑	☐	☐
Custody seals intact on sample bottles?	☐	☐	☑
Chain of custody present?	☑	☐	
Chain of custody signed when relinquished and received?	☑	☐	
Chain of custody agrees with sample labels?	☑	☐	
Samples in proper container/bottle?	☑	☐	
Sample containers intact?	☑	☐	
Sufficient sample volume for indicated test?	☑	☐	
All samples received within holding time?	☑	☐	
Container/Temp Blank temperature in compliance?	☑	☐	
Sample(s) received on ice?	☑	☐	

Temperature(s)/Thermometer(s): 3.8/3.8C | IR7
Cooler(s)/Kit(s):
Date/Time sample(s) sent to storage: 9/10/2025 3:39:21 PM

	Yes	No	
Water - VOA vials have zero headspace?	☐	☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	☑	☐	N/A ☐
pH adjusted?	☐	☑	N/A ☐

pH adjusted by: -

Login Notes:

Client Contacted:
Date Contacted:
Person Contacted:

Contacted By:
Regarding:

Comments:

CorrectiveAction:

Privileged and Confidential

SRC Page 1 of 1

Appendix C

Laboratory Data Quality Review

DATA USABILITY SUMMARY

Lori Burris of TRC Environmental Corporation (TRC) reviewed one (1) data package from ALS Global Laboratories (ALS) for the analysis of groundwater samples collected February 28, 2025, at the NRG W.A. Parish Generating Station (Parish) in Thompsons, Texas. Data were reviewed for conformance to the requirements of the guidance document, *Review and Reporting of COC Concentration Data* (RG-366/TRRP-13) (TCEQ 2010). Lori Burris verified that at the time the laboratory data were generated for the project, ALS was NELAC-accredited under the Texas Laboratory Accreditation Program for the matrices, analytes, and methods of analysis requested on the chain-of-custody documentation. ALS's National Environmental Laboratory Accreditation Program (NELAP) certification is included in the laboratory data package.

Intended Use of Data: To provide current data on concentrations of chemicals of concern (COCs) in the groundwater at the property. These data are used for compliance with the Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) Coal Combustion Residuals (CCR) detection monitoring programs. Data are also used for statistical analysis of potential statistically significant increases (SSIs).

Analyses requested included:

- ◊ EPA 300.0 – Inorganic Anions (Chloride and Sulfate) by ion chromatography;
- ◊ SM A4500-F C-11 – Anions (Fluoride) by ion selective electrode;
- ◊ SW-846 6020A – Metals (Boron and Calcium) by inductively coupled plasma-mass spectrometry (ICP/MS); and
- ◊ SM2540C – Total Dissolved Solids (TDS) by drying.

Data were reviewed and validated as described in *Review and Reporting of COC Concentration Data,* (RG-366/TRRP-13) and the results of the review/validation are discussed in this DUS.

The following laboratory submittals and field data were examined:

- ◊ the reportable data,
- ◊ the laboratory review checklists, and
- ◊ field sampling logs.

The results of supporting quality control (QC) analyses were summarized on the Laboratory Review Checklist (LRC) and Exception Report (ER) in the analytical report which was included in this review.

The LRC, associated ER, and reportable data included in this review are attached to this Data Usability Summary (DUS).

DATA REVIEW/VALIDATION RESULTS

Introduction

Twenty-five (25) groundwater samples, two (2) field duplicate samples and one (1) field blank were analyzed for anions (chloride, sulfate, and fluoride), metals (boron and calcium) and TDS. Table 1 lists the field identifications cross-referenced to laboratory identifications.

Analytical Results

The data package contains a minimum of one (1) quality control batch per analytical method analyzed. The quality control batch identifies the laboratory QC samples that correspond to the designated field samples. Not-detected results are reported as less than the value of the sample detection limit (SDL) as defined by the TRRP rule. The project Sampling and Analysis Plan (SAP) states that quality control percent recoveries of 70% to 130% indicate sufficient accuracy and a relative percent difference (RPD) of 30% indicates adequate precision. Therefore, these limits were used for comparison during this review for accuracy and precision. No data were qualified as part of this review (see Table 2).

Preservation and Holding Times

The samples were evaluated for agreement with the chain-of-custody. The samples were received in the appropriate containers with the paperwork filled out properly. The laboratory sample receipt checklist stated the samples were received at temperatures of 1.8 and 2.0°C. Samples were prepared and analyzed within holding times.

Calibrations

According to the LRC, initial and continuing calibration data met EPA, Standard Method (SM) and SW-846 Method requirements for metals, anions and TDS.

Blanks

Metals, anions, fluoride and TDS were reported as not-detected in the method blanks.

The Field Blank was reported as not-detected for metals, anions and TDS.

Laboratory Control Samples

Laboratory control samples (LCS) met the QC acceptance criteria for anions, metals and TDS.

Matrix Spike/Matrix Spike Duplicates

Matrix spike/matrix spike duplicate (MS/MSD) samples for fluoride analyzed on site samples MW-63 and MW-58 were within acceptance criteria. Chloride/sulfate MS/MSD analyzed on site samples MW-39R, MW-58 and MW-63 were within acceptance criteria. Metals batch 224887 MS/MSD was analyzed on a sample that is not part of the CCR monitoring well network and was not evaluated. MS/MSD analysis is not a requirement of TDS method SM2540C.

Metals MS/MSD batches 224893 and 224902 analyzed on site samples MW-63 and MW-58 had calcium recovery outside acceptance criteria. However, the MS/MSD spike amount for calcium was less than 4X the unspiked parent sample and may not represent the matrix effect; therefore, data were not qualified.

Anions MS/MSD batch R507897 analyzed on site sample MW-39R had sulfate recovery outside acceptance criteria. However, the MS/MSD spike amount for sulfate was less than 4X the unspiked parent sample and may not represent the matrix effect; therefore, data were not qualified.

Post Digestion Spike and Serial Dilution

The post digestion spike (PDS) and serial dilution (SD) for metals analyzed on site samples MW-58 and MW-63 were within acceptance criteria.

Laboratory Duplicates

Laboratory duplicates for TDS were within QC acceptance criteria.

Field Precision

Two (2) field duplicate samples were included in this data package (MW-36/Field Duplicate 1 and MW-44/Field Duplicate 2). Both sample and duplicate, MW-36/Field Duplicate 1, were reported as detected for metals, anions, and TDS. The relative percent difference (RPD) between sample and duplicate was within the QC acceptance criteria of 30% for the listed compounds.

Sample and duplicate, MW-44/Field Duplicate 2 were reported as detected for metals, anions, and TDS. The RPD between sample and duplicate was within the QC acceptance criteria of 30% for the listed compounds.

Sample/duplicate precision calculations are included in Table 3.

Summary

The groundwater analytical data are usable for the purpose of determining current concentrations of COCs in this medium at the Parish site.

References:

TCEQ. 2010. TRRP 13: Review and Reporting of COC Concentration Data. Texas Commission for Environmental Quality, Austin, Texas.

Environmental Resources Management (ERM). October 2017. Sampling and Analysis Plan. W.A. Parish Electric Generating Station, Thompsons, Texas.

Table 1 – Cross-Reference between Laboratory and Field Identifications

Laboratory Identification	Field Identification	Matrix Type
HS25030029-01	MW-39R	Groundwater
HS25030029-02	MW-40	Groundwater
HS25030029-03	MW-41	Groundwater
HS25030029-04	MW-62	Groundwater
HS25030029-05	MW-63	Groundwater
HS25030029-06	MW-64	Groundwater
HS25030029-07	MW-23R	Groundwater
HS25030029-08	MW-28D	Groundwater
HS25030029-09	MW-42	Groundwater
HS25030029-10	MW-43	Groundwater
HS25030029-11	MW-44	Groundwater
HS25030029-12	MW-46R	Groundwater
HS25030029-13	MW-47	Groundwater
HS25030029-14	MW-48	Groundwater
HS25030029-15	MW-50	Groundwater
HS25030029-16	MW-52	Groundwater
HS25030029-17	MW-54	Groundwater
HS25030029-18	MW-55R	Groundwater
HS25030029-19	MW-58	Groundwater
HS25030029-20	MW-65	Groundwater
HS25030029-21	MW-36	Groundwater
HS25030029-22	MW-37	Groundwater
HS25030029-23	MW-38R	Groundwater
HS25030029-24	MW-60	Groundwater
HS25030029-25	MW-61R	Groundwater
HS25030029-26	Field Blank	Water

Table 1 – Cross-Reference between Laboratory and Field Identifications

Laboratory Identification	Field Identification	Matrix Type
HS25030029-27	Field Duplicate 1	Groundwater
HS25030029-28	Field Duplicate 2	Groundwater

Table 2 – Qualified Analytical Data

Field Identification	Analyte	Qualification	Reason for Qualification
No data were qualified as part of this review.			

U – Not-detected

J – Estimated data; the reported quantitation limit or sample concentration is approximated due to exceedance of one or more QC requirements.

UJ – The analyte was analyzed for but was not detected above the reported sample detection limit. The associated value is an estimate and may be inaccurate or imprecise.

L – Bias in sample, likely to be low.

H – Bias in sample likely to be high.

Table 3 – Field Precision

Field Identification	Analyte	Sample Result (mg/L)	Duplicate Result (mg/L)	RPD[a]	Qualified
MW-36 / Field Duplicate 1	Boron	0.0734	0.0699	5	A
	Calcium	225	222	1	A
	Chloride	320	316	1	A
	Sulfate	463	458	1	A
	TDS	1,280	1,080	17	A
	Fluoride	0.440	0.410	7	A
MW-44 / Field Duplicate 2	Boron	0.212	0.200	6	A
	Calcium	101	98.1	3	A
	Chloride	224	220	2	A
	Sulfate	100	100	0	A
	TDS	760	656	15	A
	Fluoride	0.490	0.470	4	A

[a] RPD = ((SR - DR)*200)/(SR + DR)
A – Acceptable Data.
A* – Acceptable Data where results were less than 5X the MQL and the difference between sample and duplicate was less than 2X the MQL.
X – Outside the TRRP-13/SAP acceptance criteria of 30% RPD.
J – Estimated detected.
U – Not-detected.

DATA USABILITY SUMMARY

Lori Burris of TRC Environmental Corporation (TRC) reviewed one (1) data package from ALS Global Laboratories (ALS) for the analysis of groundwater samples collected March 26, 2025, at the NRG W.A. Parish Generating Station (Parish) in Thompsons, Texas. Data were reviewed for conformance to the requirements of the guidance document, *Review and Reporting of COC Concentration Data* (RG-366/TRRP-13) (TCEQ 2010). Lori Burris verified that at the time the laboratory data were generated for the project, ALS was NELAC-accredited under the Texas Laboratory Accreditation Program for the matrices, analytes, and methods of analysis requested on the chain-of-custody documentation. ALS's National Environmental Laboratory Accreditation Program (NELAP) certification is included in the laboratory data package.

Intended Use of Data: To provide current data on concentrations of chemicals of concern (COCs) in the groundwater at the property. These data are used for compliance with the Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) Coal Combustion Residuals (CCR) detection monitoring programs. Data are also used for statistical analysis of potential statistically significant increases (SSI).

Analyses requested included:

- ◊ EPA 300.0 – Inorganic Anions (Sulfate) by ion chromatography;
- ◊ SW-846 6020A – Metals (Boron and Calcium) by inductively coupled plasma-mass spectrometry (ICP/MS);
- ◊ SM A4500-F C-11 – Anions (Fluoride) by ion selective electrode; and
- ◊ SM2540C – Total Dissolved Solids (TDS) by drying.

Data were reviewed and validated as described in *Review and Reporting of COC Concentration Data,* (RG-366/TRRP-13) and the results of the review/validation are discussed in this DUS.

The following laboratory submittals and field data were examined:

- ◊ the reportable data,
- ◊ the laboratory review checklists, and
- ◊ field sampling logs.

The results of supporting quality control (QC) analyses were summarized on the Laboratory Review Checklist (LRC) and Exception Report (ER) in the analytical report which was included in this review.

The LRC, associated ER, and reportable data included in this review are attached to this Data Usability Summary (DUS).

DATA REVIEW/VALIDATION RESULTS

Introduction

Four (4) groundwater samples were analyzed for one or more of the following: sulfate, boron, calcium, fluoride and TDS. Table 1 lists the field identifications cross-referenced to laboratory identifications.

Analytical Results

The data package contains a minimum of one (1) quality control batch per analytical method analyzed. The quality control batch identifies the laboratory QC samples that correspond to the designated field samples. Not-detected results are reported as less than the value of the sample detection limit (SDL) as defined by the TRRP rule. The project Sampling and Analysis Plan (SAP) states that quality control percent recoveries of 70% to 130% indicate sufficient accuracy and a relative percent difference (RPD) of 30% indicates adequate precision. Therefore, these limits were used for comparison during this review for accuracy and precision. No data were qualified as part of this review (see Table 2).

Preservation and Holding Times

The samples were evaluated for agreement with the chain-of-custody. The samples were received in the appropriate containers with the paperwork filled out properly. The laboratory sample receipt checklist stated the samples were received at a temperature of 4.1°C. Samples were prepared and analyzed within holding times.

Calibrations

According to the LRC, initial calibration data and continuing calibration data met EPA, Standard Method (SM) and SW-846 Method requirements for sulfate, calcium, fluoride and TDS.

Continuing calibration blanks (CCB) for boron had low level detections. Associated samples were not reported for boron; therefore, data were not qualified.

Blanks

Sulfate, boron, calcium, fluoride and TDS were reported as not-detected in the method blanks.

Laboratory Control Samples

Laboratory control samples (LCS) met the QC acceptance criteria for sulfate, boron, calcium, fluoride and TDS.

Matrix Spike/Matrix Spike Duplicates

Matrix spike/matrix spike duplicate (MS/MSD) samples for boron and calcium were analyzed on samples not associated with the project site and were not evaluated. Fluoride MS/MSD was analyzed on site sample MW-63 and was within acceptance criteria. MS/MSD analysis is not a requirement of TDS method SM2540C.

Sulfate batch R509909 MS/MSD analyzed on site sample MW-37 had low recovery for sulfate. However, the MS/MSD spike amount for sulfate was less than 4X the unspiked parent sample and may not represent the matrix effect; therefore, data were not qualified.

Post Digestion Spike and Serial Dilution

The post digestion spike (PDS) and serial dilution for boron and calcium were analyzed on a sample not associated with the project site and were not evaluated.

Laboratory Duplicates

Laboratory duplicates for TDS were within QC acceptance criteria.

Field Precision

Field duplicates were not included in this data package.

Summary

The groundwater analytical data are usable for the purpose of determining current concentrations of COCs in this medium at the Parish site.

References:

TCEQ. 2010. TRRP 13: Review and Reporting of COC Concentration Data. Texas Commission for Environmental Quality, Austin, Texas.

Environmental Resources Management (ERM). October 2017. Sampling and Analysis Plan. W.A. Parish Electric Generating Station, Thompsons, Texas.

Table 1 – Cross-Reference between Laboratory and Field Identifications

Laboratory Identification	Field Identification	Matrix Type
HS25031217-01	MW-63	Groundwater
HS25031217-02	MW-37	Groundwater
HS25031217-03	MW-38R	Groundwater
HS25031217-04	MW-23R	Groundwater

Table 2 – Qualified Analytical Data

Field Identification	Analyte	Qualification	Reason for Qualification
No data were qualified as part of this review.			

U – Not-detected

J – Estimated data; the reported quantitation limit or sample concentration is approximated due to exceedance of one or more QC requirements.

UJ – The analyte was analyzed for but was not detected above the reported sample detection limit. The associated value is an estimate and may be inaccurate or imprecise.

L – Bias in sample, likely to be low.

H – Bias in sample likely to be high.

DATA USABILITY SUMMARY

Lori Burris of TRC Environmental Corporation (TRC) reviewed one (1) data package from ALS Global Laboratories (ALS) for the analysis of a groundwater sample collected April 30, 2025, at the NRG W.A. Parish Generating Station (Parish) in Thompsons, Texas. Data were reviewed for conformance to the requirements of the guidance document, *Review and Reporting of COC Concentration Data* (RG-366/TRRP-13) (TCEQ 2010). Lori Burris verified that at the time the laboratory data were generated for the project, ALS was NELAC-accredited under the Texas Laboratory Accreditation Program for the matrices, analytes, and methods of analysis requested on the chain-of-custody documentation. ALS's National Environmental Laboratory Accreditation Program (NELAP) certification is included in the laboratory data package.

Intended Use of Data: To provide current data on concentrations of chemicals of concern (COCs) in the groundwater at the property. These data are used for compliance with the Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) Coal Combustion Residuals (CCR) detection monitoring programs. Data are also used for statistical analysis of potential statistically significant increases (SSI).

Analyses requested included:

- ◊ EPA 300.0 – Inorganic Anions (Sulfate) by ion chromatography; and
- ◊ SM2540C – Total Dissolved Solids (TDS) by drying.

Data were reviewed and validated as described in *Review and Reporting of COC Concentration Data,* (RG-366/TRRP-13) and the results of the review/validation are discussed in this DUS.

The following laboratory submittals and field data were examined:

- ◊ the reportable data,
- ◊ the laboratory review checklists, and
- ◊ field sampling logs.

The results of supporting quality control (QC) analyses were summarized on the Laboratory Review Checklist (LRC) and Exception Report (ER) in the analytical report which was included in this review.

The LRC, associated ER, and reportable data included in this review are attached to this Data Usability Summary (DUS).

DATA REVIEW/VALIDATION RESULTS

Introduction

One (1) groundwater sample was analyzed for sulfate and TDS. Table 1 lists the field identifications cross-referenced to laboratory identifications.

Analytical Results

The data package contains a minimum of one (1) quality control batch per analytical method analyzed. The quality control batch identifies the laboratory QC samples that correspond to the designated field samples. Not-detected results are reported as less than the value of the sample detection limit (SDL) as defined by the TRRP rule. The project Sampling and Analysis Plan (SAP) states that quality control percent recoveries of 70% to 130% indicate sufficient accuracy and a relative percent difference (RPD) of 30% indicates adequate precision. Therefore, these limits were used for comparison during this review for accuracy and precision. No data were qualified as part of this review (see Table 2).

Preservation and Holding Times

The samples were evaluated for agreement with the chain-of-custody. The samples were received in the appropriate containers with the paperwork filled out properly. The laboratory sample receipt checklist stated the samples were received at a temperature of 3.4°C. Samples were prepared and analyzed within holding times.

Calibrations

According to the LRC, initial calibration data and continuing calibration data met EPA, Standard Method (SM) and SW-846 Method requirements for sulfate and TDS.

Blanks

Sulfate and TDS were reported as not-detected in the method blanks.

Laboratory Control Samples

Laboratory control samples (LCS) met the QC acceptance criteria for sulfate and TDS.

Matrix Spike/Matrix Spike Duplicates

Matrix spike/matrix spike duplicate (MS/MSD) samples for sulfate were analyzed on samples not associated with the project site and were not evaluated. MS/MSD analysis is not a requirement of TDS method SM2540C.

Laboratory Duplicates

Laboratory duplicates for TDS were within QC acceptance criteria.

Field Precision

Field duplicates were not included in this data package.

Summary

The groundwater analytical data are usable for the purpose of determining current concentrations of COCs in this medium at the Parish site.

References:

TCEQ. 2010. TRRP 13: Review and Reporting of COC Concentration Data. Texas Commission for Environmental Quality, Austin, Texas.

Environmental Resources Management (ERM). October 2017. Sampling and Analysis Plan. W.A. Parish Electric Generating Station, Thompsons, Texas.

Table 1 – Cross-Reference between Laboratory and Field Identifications

Laboratory Identification	Field Identification	Matrix Type
HS25041618-01	MW-61R	Groundwater

Table 2 – Qualified Analytical Data

Field Identification	Analyte	Qualification	Reason for Qualification
No data were qualified as part of this review.			

U – Not-detected

J – Estimated data; the reported quantitation limit or sample concentration is approximated due to exceedance of one or more QC requirements.

UJ – The analyte was analyzed for but was not detected above the reported sample detection limit. The associated value is an estimate and may be inaccurate or imprecise.

L – Bias in sample, likely to be low.

H – Bias in sample likely to be high.

DATA USABILITY SUMMARY

Lori Burris of TRC Environmental Corporation (TRC) reviewed one (1) data package from ALS Global Laboratories (ALS) for the analysis of groundwater samples collected August 8, 2025, at the NRG W.A. Parish Generating Station (Parish) in Thompsons, Texas. Data were reviewed for conformance to the requirements of the guidance document, *Review and Reporting of COC Concentration Data* (RG-366/TRRP-13) (TCEQ 2010). Lori Burris verified that at the time the laboratory data were generated for the project, ALS was NELAC-accredited under the Texas Laboratory Accreditation Program for the matrices, analytes, and methods of analysis requested on the chain-of-custody documentation. ALS's National Environmental Laboratory Accreditation Program (NELAP) certification is included in the laboratory data package.

Intended Use of Data: To provide current data on concentrations of chemicals of concern (COCs) in the groundwater at the property. These data are used for compliance with the Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) Coal Combustion Residuals (CCR) detection monitoring programs. Data are also used for statistical analysis of potential statistically significant increases (SSIs).

Analyses requested included:

- ◊ EPA 300.0 – Inorganic Anions (Chloride and Sulfate) by ion chromatography;
- ◊ SM A4500-F C-11 – Anions (Fluoride) by ion selective electrode;
- ◊ SW-846 6020A – Metals (Boron and Calcium) by inductively coupled plasma-mass spectrometry (ICP/MS); and
- ◊ SM2540C – Total Dissolved Solids (TDS) by drying.

Data were reviewed and validated as described in *Review and Reporting of COC Concentration Data,* (RG-366/TRRP-13) and the results of the review/validation are discussed in this DUS.

The following laboratory submittals and field data were examined:

- ◊ the reportable data,
- ◊ the laboratory review checklists, and
- ◊ field sampling logs.

The results of supporting quality control (QC) analyses were summarized on the Laboratory Review Checklist (LRC) and Exception Report (ER) in the analytical report which was included in this review.

The LRC, associated ER, and reportable data included in this review are attached to this Data Usability Summary (DUS).

DATA REVIEW/VALIDATION RESULTS

Introduction

Twenty-five (25) groundwater samples, two (2) field duplicate samples and one (1) field blank were analyzed for anions (chloride, sulfate, and fluoride), metals (boron and calcium) and TDS. Table 1 lists the field identifications cross-referenced to laboratory identifications.

Analytical Results

The data package contains a minimum of one (1) quality control batch per analytical method analyzed. The quality control batch identifies the laboratory QC samples that correspond to the designated field samples. Not-detected results are reported as less than the value of the sample detection limit (SDL) as defined by the TRRP rule. The project Sampling and Analysis Plan (SAP) states that quality control percent recoveries of 70% to 130% indicate sufficient accuracy and a relative percent difference (RPD) of 30% indicates adequate precision. Therefore, these limits were used for comparison during this review for accuracy and precision. Data qualified as part of this review are included in Table 2.

Preservation and Holding Times

The samples were evaluated for agreement with the chain-of-custody. The samples were received in the appropriate containers with the paperwork filled out properly. The laboratory sample receipt checklist stated the samples were received at temperatures of 5.0 and 4.1°C. Samples were prepared and analyzed within holding times.

Calibrations

According to the LRC, initial calibration data met EPA, Standard Method (SM) and SW-846 Method requirements for metals, anions and TDS.

Low levels of boron were detected in several continuing calibration blanks (CCBs). The associated samples were reported with detections of boron greater than 2X the CCB concentrations and were not qualified, except for Field Blank-01 which was qualified as non-detect (U) for boron, due to CCB contamination.

Blanks

Metals, anions, and TDS were reported as not-detected in the method blanks. Fluoride was reported as detected in the method blank for batch R523223a with a concentration of 0.07J mg/L. Associated samples were reported as detected equal to or greater than 2X the method blank concentration and were not qualified.

The Field Blank-01 was reported as detected for boron (0.0101J mg/L) which was determined above to be the result of CCB contamination. Field Blank-01 was also reported as detected for chloride (0.373J mg/L) and sulfate (0.504 mg/L). Associated samples were reported with detections of chloride and sulfate greater than 2X the field blank concentration and were not qualified.

Laboratory Control Samples

Laboratory control samples (LCS) met the QC acceptance criteria for anions, metals and TDS.

Matrix Spike/Matrix Spike Duplicates

Matrix spike/matrix spike duplicate (MS/MSD) samples for fluoride analyzed on site samples MW-63, MW-50 and MW-58 were within acceptance criteria. Chloride/Sulfate batch R519463 analyzed on site samples MW-58 and MW-63 were within acceptance criteria. Metals batch 231673 and chloride/sulfate batch R519466 MS/MSDs were analyzed on samples that are not part of the CCR monitoring well network and were not evaluated. MS/MSD analysis is not a requirement of TDS method SM2540C.

Metals MS/MSD batches 231672 and 231714 analyzed on site samples MW-63 and MW-58 had calcium recovery outside acceptance criteria. However, the MS/MSD spike amount for calcium was less than 4X the unspiked parent sample and may not represent the matrix effect; therefore, data were not qualified.

Post Digestion Spike and Serial Dilution

The post digestion spike (PDS) and serial dilution (SD) for metals analyzed on site samples MW-58 and MW-63 were within acceptance criteria.

Laboratory Duplicates

Laboratory duplicates for TDS were within QC acceptance criteria.

Field Precision

Two (2) field duplicate samples were included in this data package (MW-36/Field Duplicate 1 and MW-44/Field Duplicate 2). Both sample and duplicate, MW-36/Field Duplicate 1, were reported as detected for metals, anions, and TDS. The relative percent difference (RPD) between sample and duplicate was within the QC acceptance criteria of 30% for the listed compounds.

Sample and duplicate, MW-44/Field Duplicate 2 were reported as detected for metals, anions, and TDS. The RPD between sample and duplicate was within the QC acceptance criteria of 30% for the listed compounds.

Sample/duplicate precision calculations are included in Table 3.

Summary

The groundwater analytical data are usable for the purpose of determining current concentrations of COCs in this medium at the Parish site.

The data user is advised that sample Field Blank-01 was qualified as non-detect (U) for boron, due to CCB contamination.

References:

TCEQ. 2010. TRRP 13: Review and Reporting of COC Concentration Data. Texas Commission for Environmental Quality, Austin, Texas.

Environmental Resources Management (ERM). October 2017. Sampling and Analysis Plan. W.A. Parish Electric Generating Station, Thompsons, Texas.

Table 1 – Cross-Reference between Laboratory and Field Identifications

Laboratory Identification	Field Identification	Matrix Type
HS25080440-01	MW-39R	Groundwater
HS25080440-02	MW-40	Groundwater
HS25080440-03	MW-41	Groundwater
HS25080440-04	MW-62	Groundwater
HS25080440-05	MW-63	Groundwater
HS25080440-06	MW-64	Groundwater
HS25080440-07	MW-23R	Groundwater
HS25080440-08	MW-28D	Groundwater
HS25080440-09	MW-42	Groundwater
HS25080440-10	MW-43	Groundwater
HS25080440-11	MW-44	Groundwater
HS25080440-12	MW-46R	Groundwater
HS25080440-13	MW-47	Groundwater
HS25080440-14	MW-48	Groundwater
HS25080440-15	MW-50	Groundwater
HS25080440-16	MW-52	Groundwater
HS25080440-17	MW-54	Groundwater
HS25080440-18	MW-55R	Groundwater
HS25080440-19	MW-58	Groundwater
HS25080440-20	MW-65	Groundwater
HS25080440-21	MW-36	Groundwater
HS25080440-22	MW-37	Groundwater
HS25080440-23	MW-38R	Groundwater
HS25080440-24	MW-60	Groundwater
HS25080440-25	MW-61R	Groundwater
HS25080440-26	Field Blank-01	Water

Table 1 – Cross-Reference between Laboratory and Field Identifications

Laboratory Identification	Field Identification	Matrix Type
HS25080440-27	Field Duplicate 1	Groundwater
HS25080440-28	Field Duplicate 2	Groundwater

Table 2 – Qualified Analytical Data

Field Identification	Analyte	Qualification	Reason for Qualification
Field Blank-01	Boron	U	CCB contamiantion.

U – Not-detected

J – Estimated data; the reported quantitation limit or sample concentration is approximated due to exceedance of one or more QC requirements.

UJ – The analyte was analyzed for but was not detected above the reported sample detection limit. The associated value is an estimate and may be inaccurate or imprecise.

L – Bias in sample, likely to be low.

H – Bias in sample likely to be high.

Table 3 – Field Precision

Field Identification	Analyte	Sample Result (mg/L)	Duplicate Result (mg/L)	RPD[a]	Qualified
MW-36 / Field Duplicate-1	Boron	0.0688	0.0674	2	A
	Calcium	229	208	10	A
	Chloride	299	304	2	A
	Sulfate	410	404	2	A
	TDS	1,470	1,320	11	A
	Fluoride	0.470	0.410	14	A
MW-44 / Field Duplicate-2	Boron	0.191	0.191	0	A
	Calcium	104	99.6	4	A
	Chloride	216	209	3	A
	Sulfate	83.0	81.3	2	A
	TDS	836	836	0	A
	Fluoride	0.470	0.460	2	A

[a] RPD = ((SR - DR)*200)/(SR + DR)
A - Acceptable Data.
A* - Acceptable Data where results were less than 5X the MQL and the difference between sample and duplicate was less than 2X the MQL.
X – Outside the TRRP-13/SAP acceptance criteria of 30% RPD.
J – Estimated detected.
U – Not-detected.

DATA USABILITY SUMMARY

Lori Burris of TRC Environmental Corporation (TRC) reviewed one (1) data package from ALS Global Laboratories (ALS) for the analysis of groundwater samples collected September 5, 2025, at the NRG W.A. Parish Generating Station (Parish) in Thompsons, Texas. Data were reviewed for conformance to the requirements of the guidance document, *Review and Reporting of COC Concentration Data* (RG-366/TRRP-13) (TCEQ 2010). Lori Burris verified that at the time the laboratory data were generated for the project, ALS was NELAC-accredited under the Texas Laboratory Accreditation Program for the matrices, analytes, and methods of analysis requested on the chain-of-custody documentation. ALS's National Environmental Laboratory Accreditation Program (NELAP) certification is included in the laboratory data package.

Intended Use of Data: To provide current data on concentrations of chemicals of concern (COCs) in the groundwater at the property. These data are used for compliance with the Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) Coal Combustion Residuals (CCR) detection monitoring programs. Data are also used for statistical analysis of potential statistically significant increases (SSI).

Analyses requested included:

◊ EPA 300.0 – Inorganic Anions (Sulfate) by ion chromatography;
◊ SW-846 6020A – Metals (Boron and Calcium) by inductively coupled plasma-mass spectrometry (ICP/MS);
◊ SM A4500-F C-11 – Anions (Fluoride) by ion selective electrode;
◊ SW-846 9040C – pH by electrometric measurement; and
◊ SM2540C – Total Dissolved Solids (TDS) by drying.

Data were reviewed and validated as described in *Review and Reporting of COC Concentration Data,* (RG-366/TRRP-13) and the results of the review/validation are discussed in this DUS.

The following laboratory submittals and field data were examined:

◊ the reportable data,
◊ the laboratory review checklists, and
◊ field sampling logs.

The results of supporting quality control (QC) analyses were summarized on the Laboratory Review Checklist (LRC) and Exception Report (ER) in the analytical report which was included in this review.

The LRC, associated ER, and reportable data included in this review are attached to this Data Usability Summary (DUS).

DATA REVIEW/VALIDATION RESULTS

Introduction

Ten (10) groundwater samples were analyzed for one or more of the following: sulfate, boron, calcium, fluoride, pH and TDS. Table 1 lists the field identifications cross-referenced to laboratory identifications.

Analytical Results

The data package contains a minimum of one (1) quality control batch per analytical method analyzed. The quality control batch identifies the laboratory QC samples that correspond to the designated field samples. Not-detected results are reported as less than the value of the sample detection limit (SDL) as defined by the TRRP rule. The project Sampling and Analysis Plan (SAP) states that quality control percent recoveries of 70% to 130% indicate sufficient accuracy and a relative percent difference (RPD) of 30% indicates adequate precision. Therefore, these limits were used for comparison during this review for accuracy and precision. No data were qualified as part of this review (see Table 2).

Preservation and Holding Times

The samples were evaluated for agreement with the chain-of-custody. The samples were received in the appropriate containers with the paperwork filled out properly. The laboratory sample receipt checklist stated the samples were received at a temperature of 1.5°C. Samples were prepared and analyzed within holding times, except for pH samples as pH has a 15 minute holding time.

Calibrations

According to the LRC, initial calibration data and continuing calibration data met EPA, Standard Method (SM) and SW-846 Method requirements for sulfate, calcium, fluoride and TDS.

Continuing calibration blanks (CCB) for boron had low level detections. Associated samples were reported for boron greater than 2X the CCB concentration and were not qualified.

Blanks

Sulfate, boron, calcium, fluoride and TDS were reported as not-detected in the method blanks.

Laboratory Control Samples

Laboratory control samples (LCS) met the QC acceptance criteria for sulfate, boron, calcium, fluoride and TDS.

Matrix Spike/Matrix Spike Duplicates

Matrix spike/matrix spike duplicate (MS/MSD) samples for boron and calcium were analyzed on samples not associated with the project site and were not evaluated. Fluoride MS/MSD was analyzed on site sample MW-41 and was within acceptance criteria. Sulfate MS/MSD was analyzed on site sample MW-39R and was withing acceptance criteria. MS/MSD analysis is not a requirement of TDS method SM2540C.

Post Digestion Spike and Serial Dilution

The post digestion spike (PDS) and serial dilution for boron and calcium were analyzed on a sample not associated with the project site and were not evaluated.

Laboratory Duplicates

Laboratory duplicates for TDS and pH were within QC acceptance criteria.

Field Precision

Field duplicates were not included in this data package.

Summary

The groundwater analytical data are usable for the purpose of determining current concentrations of COCs in this medium at the Parish site.

References:

TCEQ. 2010. TRRP 13: Review and Reporting of COC Concentration Data. Texas Commission for Environmental Quality, Austin, Texas.

Environmental Resources Management (ERM). October 2017. Sampling and Analysis Plan. W.A. Parish Electric Generating Station, Thompsons, Texas.

Table 1 – Cross-Reference between Laboratory and Field Identifications

Laboratory Identification	Field Identification	Matrix Type
HS25090251-01	MW-41	Groundwater
HS25090251-02	MW-39R	Groundwater
HS25090251-03	MW-64	Groundwater
HS25090251-04	MW-63	Groundwater
HS25090251-05	MW-62	Groundwater
HS25090251-06	MW-37	Groundwater
HS25090251-07	MW-38R	Groundwater
HS25090251-08	MW-61R	Groundwater
HS25090251-09	MW-58	Groundwater
HS25090251-10	MW-23R	Groundwater

Table 2 – Qualified Analytical Data

Field Identification	Analyte	Qualification	Reason for Qualification
No data were qualified as part of this review.			

U – Not-detected

J – Estimated data; the reported quantitation limit or sample concentration is approximated due to exceedance of one or more QC requirements.

UJ – The analyte was analyzed for but was not detected above the reported sample detection limit. The associated value is an estimate and may be inaccurate or imprecise.

L – Bias in sample, likely to be low.

H – Bias in sample likely to be high.

Appendix F

Alternative Source Demonstrations

Texas Commission on Environmental Quality

Waste Permits Division Correspondence Cover Sheet

Date: July 28, 2025
Facility Name: NRG-WA Parish Generating Station
Permit or Registration No.: CCR108

Nature of Correspondence:
☒ Initial/New
☐ Response/Revision to TCEQ Tracking No.: ______ (from subject line of TCEQ letter regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Notifications
☐ New Notice of Intent	☐ Alternative Daily Cover Report
☐ Notice of Intent Revision	☐ Closure Report
☐ New Permit (including Subchapter T)	☐ Compost Report
☐ New Registration (including Subchapter T)	☒ Groundwater Alternate Source Demonstration
☐ Major Amendment	☐ Groundwater Corrective Action
☐ Minor Amendment	☐ Groundwater Monitoring Report
☐ Limited Scope Major Amendment	☐ Groundwater Background Evaluation
☐ Notice Modification	☐ Landfill Gas Corrective Action
☐ Non-Notice Modification	☐ Landfill Gas Monitoring
☐ Transfer/Name Change Modification	☐ Liner Evaluation Report
☐ Temporary Authorization	☐ Soil Boring Plan
☐ Voluntary Revocation	☐ Special Waste Request
☐ Subchapter T Disturbance Non-Enclosed Structure	☐ Other:
☐ Other:	

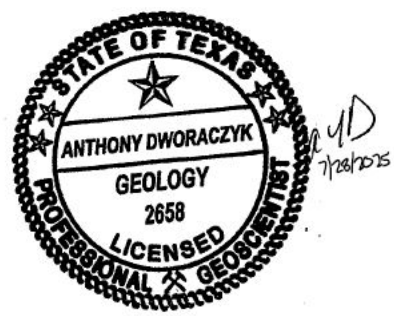
Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
☐ New	☐ Annual/Biennial Site Activity Report
☐ Renewal	☐ CPT Plan/Result
☐ Post-Closure Order	☐ Closure Certification/Report
☐ Major Amendment	☐ Construction Certification/Report
☐ Minor Amendment	☐ CPT Plan/Result
☐ CCR Registration	☐ Extension Request
☐ CCR Registration Major Amendment	☐ Groundwater Monitoring Report
☐ CCR Registration Minor Amendment	☐ Interim Status Change
☐ Class 3 Modification	☐ Interim Status Closure Plan
☐ Class 2 Modification	☐ Soil Core Monitoring Report
☐ Class 1 ED Modification	☐ Treatability Study
☐ Class 1 Modification	☐ Trial Burn Plan/Result
☐ Endorsement	☐ Unsaturated Zone Monitoring Report
☐ Temporary Authorization	☐ Waste Minimization Report
☐ Voluntary Revocation	☐ Other:
☐ 335.6 Notification	
☐ Other:	

I hereby certify that the alternative source demonstration presented within this document for the NRG WA Parish Coal Ash Disposal Landfill CCR Unit has been prepared to meet the requirements of 30 TAC 352.4; 352.941(c); and 352.1321. This document is accurate and has been prepared in accordance with good geosciences practices, including the consideration of applicable industry standards, and with the requirements of 30 TAC 352.4; 352.941(c); and 352.1321.

Name: Tony Dworaczyk **Expiration Date:** 1/30/2026

Company: TRC Environmental Corporation **Date:** 7/28/2025



Alternative Source Demonstration

W.A. Parish Electric Generating Station
Air Preheater Pond (SWMU 021)

July 2025

Prepared For
NRG Texas Power, LLC
Thompsons, Texas
TCEQ Coal Combustion Residuals (CCR) Registration No. CCR108
Industrial Solid Waste Registration No. 31631
EPA Identification No. TXD097311849

Gregory E. Tieman
Senior Client Services Manager

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Executive Summary

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas. Units managing coal combustion residuals (CCR) at the Station are subject to the requirements of 30 Texas Administrative Code (TAC) Chapter 352. CCR generated at the Station consists of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge. The Site has three active CCR management units that are subject to regulation under 30 TAC Chapter 32, including the Air Preheater Pond (APH) Pond, which is the subject of this Alternative Source Demonstration (ASD).

The 16th semi-annual groundwater detection monitoring event was conducted on February 28, 2025 and verification sampling was performed on April 30, 2025. Statistical evaluation of the results was performed to identify apparent statistically significant increases (SSIs) above background pursuant to 30 TAC 352 Subpart H. Three apparent SSIs, fluoride, boron, and pH were identified at one monitoring well (MW-63). NRG notified the Texas Commission on Environmental Quality (TCEQ) of its intent to prepare an ASD.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the second half 2019 (July) through the first half 2021 (April). February 28, 2025, semi-annual detection monitoring event analytical results and verification sampling results, are the eighth data set statistically evaluated using the new background water quality data set.

This ASD successfully identified alternative sources for apparent SSIs at the APH Pond, based on the following lines of reasoning:

- It appears that the construction activities that occurred during the retrofit of the APH Pond per the federal CCR Rule during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer as follows:
    - As a result of removal of water from the APH Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
    - Excavation of all CCR and decontamination of the APH Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
    - Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
    - As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are

anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.

- As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.
- Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition; and
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Therefore, since retrofit construction activities have been completed recently and it appears the uppermost aquifer system is continuing to re-equilibrate, NRG will continue performing semi-annual detection monitoring for the APH Pond per 30 TAC Chapter 352.

Section 1
Introduction

1.1 Background

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas, adjacent to Smithers Lake. The electricity generating portion of the Station, or the main Plant Operations Area (Plant Area), is located along the southeastern shore of the lake.

Management of coal combustion residuals (CCR) at the Station is performed pursuant to 30 Texas Administrative Code (TAC) Chapter 352, which became effective during June 2021. Prior to this, management of CCR was performed pursuant to the United States Environmental Protection Agency (USEPA) final rule for the regulation and management of CCR under the Resource Conservation and Recovery Act (RCRA) Title 40, Code of Federal Regulations, Part 257 (40 CFR §257) (CCR Rule, effective date October 19, 2015).

CCR generated at the Station consist of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge, which have been classified by the TCEQ as Class II nonhazardous waste. The Station has the following three active CCR-management units:

- Solid Waste Disposal Area (SWDA) (SWMU 001), which consists of four active CCR-management cells: Cell 1C, Cell 2A-Pug Mill, Cell 2B, and Cell 3; and is now monitored as a single CCR Multiunit;
- Air Preheater Pond (APH Pond, SWMU 021); and
- FGD Emergency Pond (E Pond, SWMU 020).

The APH Pond receives effluent from air preheater wash and boiler cleaning wash, which consists of fly ash or economizer ash particles and water. The APH Pond is located at the southern portion of the Plant Area as shown on Figure 1 and is the subject of this Alternative Source Demonstration (ASD).

1.1.1 Retrofit Construction Activities

During 2020 and 2021, the APH Pond was removed from service and retrofitted per §257.102(k) of the federal CCR Rule. As part of these activities, the CCR within the impoundment was dewatered, all water and CCR was removed from the impoundment, and the APH Pond area was decontaminated based on over-excavating a minimum of 6-inches of clay liner material after removal of CCR. After CCR removal and decontamination had been confirmed, a federal CCR Rule bottom composite liner system was then installed and the APH Pond was placed back into service as a CCR unit compliant with both the federal and TCEQ CCR programs.

During retrofit construction activities for the APH Pond, upgradient groundwater monitoring well MW-39 was apparently destroyed and could not be located during the April 2021 semi-annual detection monitoring event. Therefore, MW-39 was replaced by MW-39R that was installed in the approximate location of MW-39 prior to performance of the October 2021 semi-annual detection monitoring event.

Furthermore, during retrofit construction activities, it appears that the geochemistry and hydrogeology of the uppermost aquifer were altered as follows:

- As a result of removal of water from the APH Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
- Excavation of all CCR and decontamination of the APH Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
- Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
- As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.

As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.

1.1.2 Groundwater Monitoring Program

On behalf of NRG, Environmental Resources Management, Inc. (ERM) conducted eight independent background groundwater detection monitoring events for both the Appendix III and IV CCR constituents between April 2015 and August 2017 per §257.94(b) of the federal CCR Rule and the first semi-annual detection monitoring event in October 2017. Results of the eight background and first semi-annual detection monitoring events for the APH Pond were documented in the *Annual Groundwater Monitoring Report, Landfill (Unit 004)* (ERM 2018a) and the *Annual Groundwater Monitoring Report, APH Pond (Unit 021)* (ERM 2018a) and the March 1, 2018, *Groundwater Monitoring Report, APH Pond* (SWMU Unit 021) (ERM 2018b) pursuant to §257.90(e).

The Station has continued to conduct semi-annual detection monitoring at the APH Pond per the federal CCR Rule and 30 TAC Chapter 352. As of February 28, 2025, sampling event, a total of 16 semi-annual detection monitoring events have now been performed. Following each semi-annual detection monitoring sampling event, the results have been evaluated for potential SSIs, and ASDs have been prepared as needed. Since implementation of 30 TAC Chapter 352, the ASDs have been submitted to TCEQ for review and approval. The semi-annual detection monitoring activities and ASDs have been included in the Annual Groundwater Monitoring and Corrective Action reports, which have been placed into the Facility Operating Record (FOR) and posted to NRG's publicly accessible website.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the third half 2019 (July) through the first half 2021 (April). February 28, 2025, semi-annual detection monitoring event analytical results are the eighth data set statistically evaluated using the new background water quality data set.

1.2 Purpose

TRC prepared this ASD to evaluate apparent SSIs above background levels for the 16th semi-annual detection monitoring event in accordance with 30 TAC Chapter 352.

Section 2
Site Geology and Hydrogeology

This section provides information about the geology and hydrogeology of the Station and the area at and surrounding the APH Pond.

2.1 Hydrogeology

According to the *Geologic Atlas of Texas, Houston Sheet* (BEG 1982), the Station is underlain by alluvium and the Beaumont formation (also commonly referred to as the Beaumont Clay). The alluvium is present along the Brazos River, which is located approximately 0.9 miles from the northern boundary of the SWDA CCR units. Both the alluvium and the Beaumont formation are composed of clay, silt, and sand; and may include stream channel, point-bar, natural levee, back swamp, coastal marsh, and mud-flat deposits. The thickness of the Beaumont formation is approximately 100 feet. The alluvium is not present at the Plant Area, which is consistent with this area being located outside of the Brazos River floodplain zone (FBC 2018). The APH Pond and the E Pond are both located at the Plant Area.

The alluvium and the Beaumont Formation are located within the upper unit of the Chicot aquifer system. At most locations throughout Fort Bend County, the Chicot aquifer system is under confined conditions (TWDB 1990). The Chicot aquifer system is primarily recharged by precipitation at locations where it outcrops in Austin, Harris, and Waller Counties; groundwater then flows laterally within Fort Bend County (TWDB 1990). Site investigations performed by others on behalf of NRG also indicate that the uppermost groundwater-bearing units at the site are under confined conditions (ERM 2017a).

Environmental investigations conducted in May 2016 and November 2016 by ERM identified three main subsurface strata at the Station, which were designated as Stratum DA-1 through DA-3 at the SWDA and stratum PA-1 through PA-3 at the Plant Area (APH Pond and E Pond). The strata are fully described in the October 2017 *CCR Groundwater Monitoring Networks* report (ERM 2017b) and are summarized below.

2.1.1 Stratum PA-1 (Upper Confining Unit)

Stratum PA-1 is predominately silty clay with some sandy clay, clay, and sandy silt. Stratum PA-1 is present from the ground surface to depths ranging from 15 feet bgs to 32 feet bgs.

Stratum PA-1 serves as a confining unit to underlying Stratum PA-2, which comprises the uppermost groundwater-bearing unit at the APH Pond and E Pond. Geotechnical laboratory testing indicates that the hydraulic conductivity of Stratum PA-1 is 2.03E-08 centimeters per second (cm/sec) (ERM 2017b).

2.1.2 Stratum PA-2 (Upper Aquifer)

Stratum PA-2 is predominantly silty sand with varying sand and silt content and trace clay. Stratum PA-2 is generally greater than 10 feet in thickness with bottom depths ranging from 60 to 80 feet bgs.

Stratum PA-2 is saturated and comprises the uppermost groundwater-bearing unit at the APH Pond and E Pond. CCR monitoring wells in the Plant Area are completed within Stratum PA-2. Slug testing results for CCR monitoring wells indicate hydraulic conductivity ranges from 6.68E-04 cm/sec to 4.26E-02 cm/sec in Stratum PA-2 (ERM 2017b). Groundwater primarily flows to the southwest beneath the E Pond, and to the southeast beneath the APH Pond.

2.1.3 Stratum PA-3 (Lower Confining Unit)

Stratum PA-3 is predominantly clay to silty clay. This stratum appears to be the bottom confining layer to the overlying groundwater-bearing unit (Stratum PA-2). The thickness of Stratum PA-3 has not been defined.

2.1.4 Air Preheater Pond - Certified Monitoring Network

The certified CCR groundwater monitoring well network for the APH Pond consists of six groundwater monitoring wells (MW-39R, MW-40, MW-41, MW-62, MW-63, and MW-64) completed into Stratum PA-2. A groundwater potentiometric surface map was prepared by TRC for the March 1, 2024, semi-annual detection monitoring event and is provided in this ASD as Figure 2. Historically, groundwater flows to the southeast beneath the APH Pond at a gradient ranging from approximately 0.002 feet per foot (ft/ft) to 0.006 ft/ft.

The groundwater monitoring system for the APH Pond was originally certified per the federal CCR Rule on October 17, 2017. The original certified CCR groundwater monitoring well network for the APH Pond designated one upgradient monitoring well (MW-62) and five downgradient monitoring wells (MW-39, MW-40, MW-41, MW-63, and MW-64). However, based on TRC's review of groundwater elevation data measured for the semi-annual detection monitoring events and preparation of potentiometric surface maps, two of the initially designated downgradient monitoring wells (MW-39 and MW-40) were found to be located upgradient of the APH Pond as shown on the March 1, 2024, groundwater potentiometric surface map (Figure 2). Therefore, the CCR monitoring well system for the APH Pond was revised and consists of three upgradient monitoring wells (MW-39R, MW-40, and MW-62) and three downgradient monitoring wells (MW-41, MW-63, and MW-64).

During retrofit construction activities for the APH Pond during 2020 and 2021 per the federal CCR Rule, upgradient groundwater monitoring well MW-39 was apparently destroyed and could not be located during the April 2021 detection monitoring event. A replacement monitoring well (MW-39R) was installed during 2021 in close proximity to the location of former well MW-39 prior to the October 2021 semi-annual detection monitoring event and was monitored during that detection monitoring event.

2.2 Site Specific Information

Subsurface data from a soil boring recently installed as part of the current monitoring network at the nearby Emergency Pond (E-Pond) at the Station indicate that the subsurface geology beneath the W.A. Parish generating facility consists predominately of clays, silty clays with sandy clay, sandy silt, and sands and is consistent across the Station (ERM, Groundwater Monitoring networks, October 2017).

During the original installation of monitor wells for the W.A. Parish CCR monitoring networks, soil samples were not collected for Appendix III & IV CCR constituent analyses. In November 2024, monitor well MW-61R was installed at the E-Pond to replace MW-61 as part of the construction of a Zero Liquid Discharge (ZLD) wastewater treatment facility required under the Effluent Limitation Guidelines (ELG) for coal-fired power plants. During the installation of MW-61R, soil samples of native subsurface soils were collected on November 7, 2024, and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron, fluoride and pH, which are the apparent SSIs for this 16th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4' bgs	27-27'bgs
Boron	3.39 mg/kg	7.35 mg/Kg
Fluoride	5.49 mg/Kg	2.32 mg/Kg
pH	8.86	8.95

Based on the consistency of the subsurface soils at the APH Pond and the E-Pond, and the close proximity of the APH Pond to the E-Pond, the subsurface soil laboratory analytical results for the E-Pond are considered to be representative for both CCR Units. The laboratory analytical report is included as Appendix A of this ASD. As shown in the above table, the concentrations of boron and sulfate in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

2.3 Groundwater Geochemistry

Understanding the geochemistry of groundwater is essential to examining the groundwater monitoring data, explaining the relationships between the characteristics of the groundwater, and analyzing both natural and potential anthropogenic impacts on groundwater. Separate from potential source areas of contamination, geochemical processes are critical in controlling the chemical composition of groundwater, including carbonate equilibrium, oxidation-reduction reactions, and adsorption-desorption processes. Based on the hydrogeology of the APH Pond, boron, fluoride, and pH are discussed in the subsections below.

Therefore, separate from potential source areas of contamination, geochemical processes are critical in controlling the chemical composition of groundwater, including carbonate equilibrium, oxidation-reduction reactions, and adsorption-desorption processes and leaching of constituents from the soil into the groundwater.

2.3.1 Boron in Groundwater

Boron is normally considered to be a minor constituent in groundwater since it is generally present in low concentrations (Palmucci & Rusi, 2014). Apart from a potential boron source area, the primary origin of boron in groundwater is typically associated with the processes of sorption and desorption from mineral surfaces including soil and bedrock (Ravenscroft & McArthur, 2004). Boron is often cited as a contaminant trace chemical and usually occurs as a non-ionized form as H_3BO_3 in soils at pH <8.5, but above this pH, it exists as an anion, $B(OH)_4^-$ (Upadhyaya et al., 2014).

The factors that may influence the concentration of boron in groundwater include weathering, human activity, evaporative concentration, ion-exchange, electrical conductivity (EC), and pH. Ravenscroft & McArthur (2004) investigated the mechanism of regional boron enrichment in groundwater and the results indicated that the main process resulting in boron enrichment in groundwater was flushing by fresh groundwater. The desorption of boron from mineral surfaces could be affected by pH, ionic strength, salinity, and the HCO_3/CO_3 ratio. Decreases in pH will increase the dissolution of boron from the mineral surfaces. Boron adsorption favors high pH and boron desorption favors low pH in rocks, soils, and organic matters (Hollis et al., 1988; Keren & Communar, 2009; Tabelin et al., 2014).

Additional investigations confirmed that the presence of boron in groundwater depends on the EC (salinity), such that the concentration of boron increases with increasing EC. Halim et al. (2010) reported that the increae in Cl^- contributes to an increase in EC value since a strong linear correlation (R^2 = 0.88) between EC and Cl^- was observed. Palmucci & Rusi (2014) observed a clear correlation between elevated concentrations of boron and the chloride-sodium facies, which are characterized by high saline content, negative redox potential, and low value of the SO_4^{2-}/Cl^- ratio. Rodriguez-Espinosa et al. (2020) determined that the concentration of boron in groundwater was related to SO_4^{2-} and the age affect.

Regarding the concentration of boron in groundwater at the APH Pond, the source of boron is natural rather than anthropogenic. Therefore, the increase in concentration of boron is related to natural variations in groundwater geochemistry, such as pH, ion exchanges, EC, and salinity.

2.3.2 Fluoride in Groundwater

The common natural source of fluoride in groundwater is the dissolution of natural fluoride-bearing minerals, such as fluorspar, fluorapatite, amphiboles, hornblende, tremolite, and biotite (Luo et al., 2018). The natural concentration of fluoride in groundwater depends on the geological, chemical, and physical characteristics of the aquifer, the porosity and acidity of the soils and rock, temperature, interaction with other chemical elements, depth of the aquifer, and intensity of weathering (Brindha & Elango, 2011). Reflecting the range in concentrations of fluoride in groundwater for the Station, it is likely that geochemical processes are the primary variable controlling the concentrations of fluoride in groundwater.

A range of natural and anthropogenic geochemical processes including Ion exchange, evaporation, adsorption-desorption, ion competition, mixing, and salinization can occur resulting in an increase in fluoride concentrations in groundwater (Luo et al., 2018). In particular, alkaline pH, elevated concentrations of sodium and bicarbonate, and decreased concentrations of calcium are geochemical variables.

Alkaline pH can increase the fluoride dissolution from mineral surfaces into groundwater. Saxena & Ahmed (2001) observed that alkaline conditions with pH ranging between 7.6 and 8.6 are favorable for dissolution of fluorite mineral from the host rocks.

Sodium bicarbonate-type waters are typical of high fluoride waters. Multiple investigations have demonstrated positive correlations between fluoride and both bicarbonate and sodium as well as an inverse relation between fluoride and calcium (Mondal et al., 2014; Guo et al., 2012; Chen et al., 2020). The chemical reactions for the dissolution of fluoride in the presence of high bicarbonate and sodium, and low calcium content is described as follows (Kimambo et al., 2019):

$$\mathrm{Na^+ + \; + HCO_3^- - \rightarrow NaHCO_3}$$

$$\mathrm{CaF_2 + \; + 2NaHCO_3 \; \rightarrow CaCO_3 + 2Na^+ + 2F^- + \; H_2O + CO_2}$$

Luo et al. (2018) reported that cation exchange can increase the concentration of fluoride when increasing the Na/Ca molar ratio via ion complexation, and salt affect can further increase the fluoride dissolution from mineral surfaces.

In addition, evaporation is another potential reason that can result in an increased concentration of fluoride in shallow groundwater. Evaporation may directly remove water from shallow aquifers and result in an elevated fluoride concentration. Evaporation can increase ion concentrations, leading to the precipitation of some major minerals, reducing the calcium concentration, and favoring the dissolution of fluoride.

2.3.3 pH

The apparent pH SSIs appear to be related to natural variations in groundwater quality resulting in changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP) and are also related to changes in the measured concentrations of CCR constituents.

Section 3
Alternative Source Demonstration

The 16th semi-annual detection monitoring event was conducted on February 28, 2025, per 30 TAC Chapter 352. Statistical evaluation of the results (comparison of downgradient monitoring results to 95 percent confidence/95 percent coverage upper tolerance limits [UTLs]) was performed within 60 days of sample collection to identify apparent SSIs above background pursuant to 30 TAC 352, Subpart H. Three apparent SSIs were initially identified (fluoride, boron, and pH).

As part of the ASD activities, verification sampling was conducted on April 30, 2025, for the initial three apparent SSIs. Three apparent SSIs were confirmed: fluoride, boron, and pH for one monitoring well (MW-63). Based on the results of the verification sampling and statistical analysis, NRG notified TCEQ of its intent to prepare an ASD addressing the apparent SSIs for boron, fluoride and pH.

The UTLs and sampling results for the three apparent SSIs are provided in Table 1 below.

Table 1 SSIs – February 2025 Semi-Annual Detection Monitoring Event

ANALYTE	WELL	LTL	UTL	SAMPLE DATE	VALUE	UNIT
Boron	MW-63	NA	0.23	02/28/2025	0.743	mg/L
Fluoride	MW-63	NA	0.20	02/28/2025	0.280	mg/L
pH	MW-63	6.4	6.90	02/28/2025	7.21	S.U.

Notes: mg/L = milligrams per Liter
S.U. = Standard Units

As discussed previously in subsection 1.1.1 of this ASD, during retrofit construction activities at the APH Pond during 2020 and 2021 per the federal CCR Rule, it appears that the geochemistry and hydrogeology of the uppermost aquifer were altered as follows:

- As a result of removal of water from the APH Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
- Excavation of all CCR and decontamination of the APH Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
- Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
- As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and ORP, are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.

As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.

In addition, as discussed previously in subsection 2.2 of this ASD, on November 7, 2024 during installation of monitor well MW-61R at the E-Pond to replace MW-61 as part of the construction of a ZLD wastewater treatment facility, soil samples of native subsurface soils were collected and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron, fluoride, and pH, which are the apparent SSIs for this 16th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4' bgs	27-27'bgs
Boron	3.39 mg/kg	7.35 mg/Kg
Fluoride	5.49 mg/Kg	2.32 mg/Kg
pH	8.86	8.95

Based on the consistency of the subsurface soils at the APH Pond and the E-Pond, and the close proximity of the APH Pond to the E-Pond, the subsurface soil laboratory analytical results for the E-Pond are considered to be representative for both CCR Units. As shown in the above table, the concentrations of boron and pH in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Section 4
Conclusions

Based on statistical evaluation of February 28, 2025, semi-annual detection monitoring event and the verification sampling, three apparent SSIs, fluoride, boron, and pH were identified for the APH Pond. This ASD has identified the following lines of reasoning that support alternative sources for the apparent SSI:

- It appears that the construction activities that occurred during the retrofit of the APH Pond per the federal CCR Rule during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer as follows:
  - As a result of removal of water from the APH Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
  - Excavation of all CCR and decontamination of the APH Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
  - Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
  - As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.
- As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.
- Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition; and
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Therefore, based on the lines of reasoning presented in this ASD, alternative sources other than a release from the retrofitted APH Pond have been shown to be responsible for the apparent SSIs observed. Based on preparation of this successful ASD, NRG will continue semi-annual detection monitoring for the APH Pond, and quarterly monitoring for MW-61R until eight quarterly background detection monitoring events for the Appendix III and IV CCR constituents have been performed per 30 TAC Chapter 352.

Section 5 References

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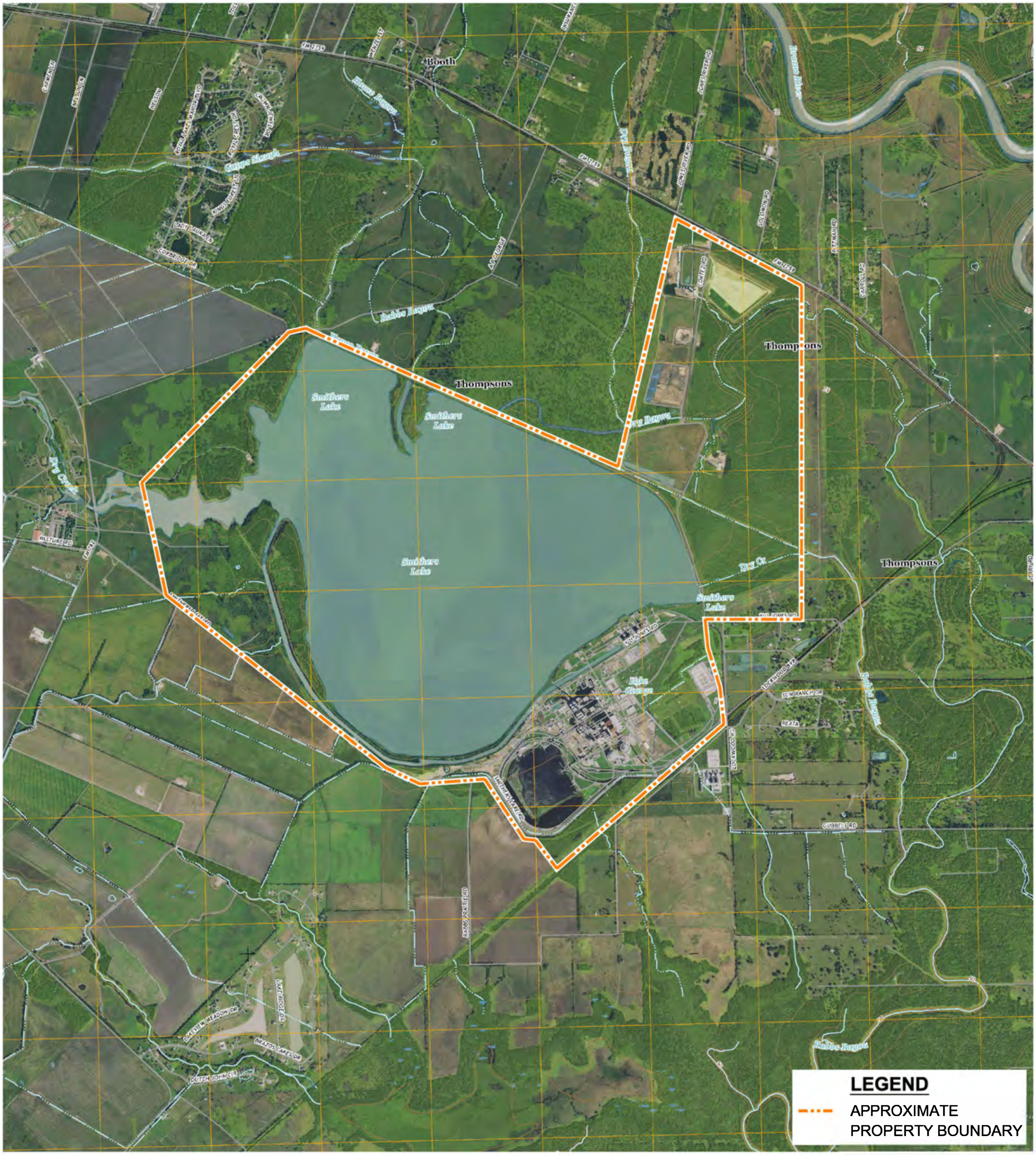
Figures



REFERENCE: U.S.G.S. 7.5 MINUTE TOPOGRAPHIC QUADRANGLES
MISSOURI CITY, TEXAS (2016) / SMITHERS LAKE, TEXAS (2016) / SUGAR LAND, TEXAS (2016) / THOMPSONS, TEXAS (2016)

TEXAS
QUADRANGLE LOCATION

0 2,000' 4,000' 8,000'

SCALE IN FEET
1" = 4,000'-0"

CLIENT / PROJECT

NRG TEXAS POWER, LLC
W.A. Parish Station
Thompsons, Texas

TITLE

SITE LOCATION MAP

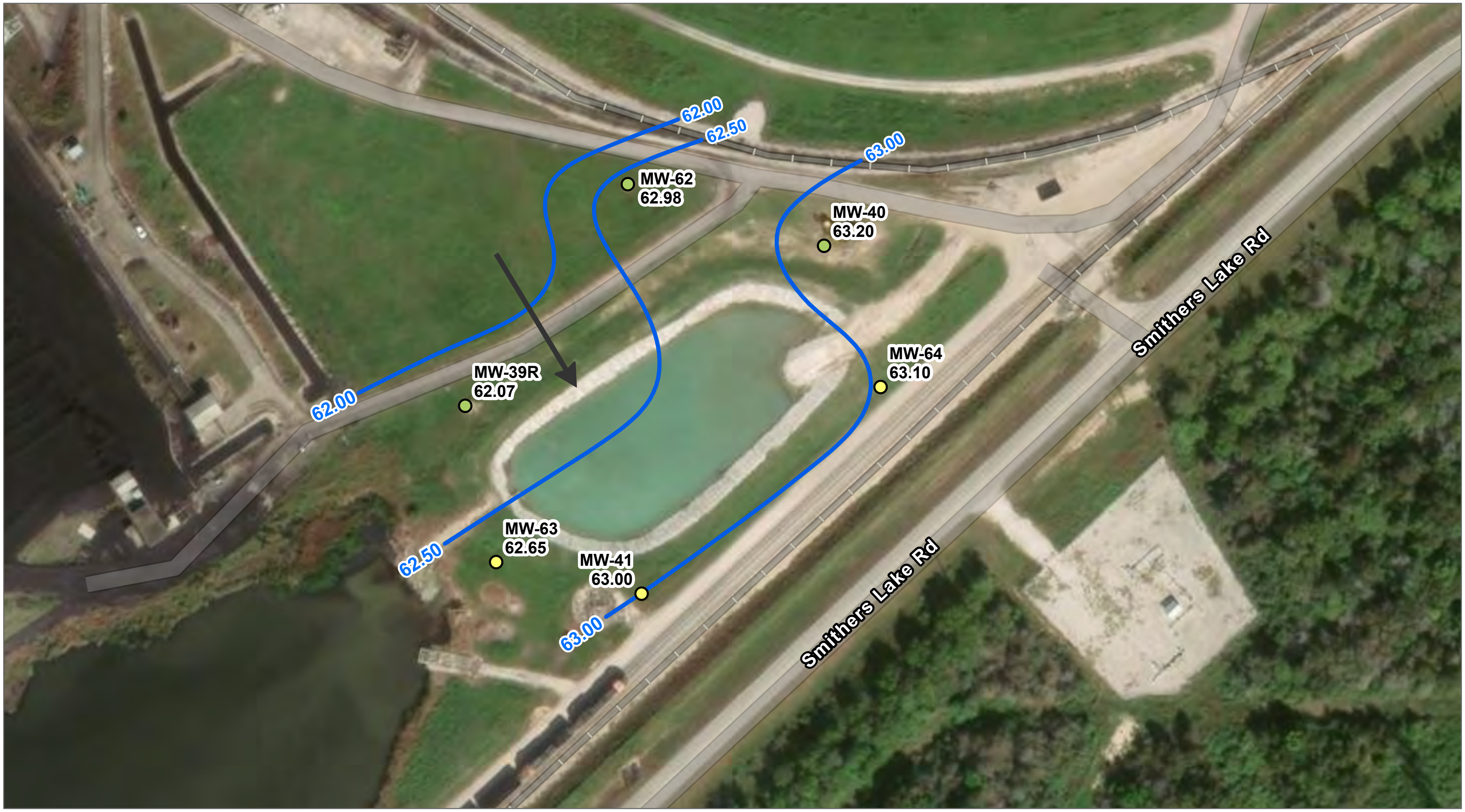
DRAWN BY: **O. Fonseka**	REQUEST BY: **J. Atwell**	PROJECT NO. **649506**
DWG. DATE: **January 2025**	PROJECT-MGR: **T. Dworaczyk**	

TRC
11767 KATY FREEWAY, SUITE 850
HOUSTON, TEXAS 77079
PHONE: 281-616-0100
TRCcompanies.com

FIGURE
1

LAST EDIT: 01/22/2025 - FILE LOCATION: HOU C:\OF-TRC\DRAFTING-CDrive\ECR-Files\NRG\W.A. Parish Station - Thompsons-TX\2025\ Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg

DRAWING By: Oskar Fonseka - FILE NAME: Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg



MULTIUNIT UPGRADIENT MONITOR WELL

MULTIUNIT DOWNGRADIENT MONITOR WELL

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR (FT MSL)

STATE OF TEXAS
ANTHONY DWORACZYK
GEOLOGY
2658
LICENSED
PROFESSIONAL GEOSCIENTIST

AD 7/28/2025

PROJECT:	NRG TEXAS POWER, LLC W.A. PARISH STATION THOMPSONS, TEXAS
TITLE:	AIR PREHEATER POND GROUNDWATER MONITORING NETWORK
DRAWN BY:	M. BILLINGS
PROJ. NO.:	649506
CHECKED BY:	S. MOTURI
APPROVED BY:	J. ATWELL
DATE:	JULY 2025
	FIGURE 2
FILE:	PARISHSTATION_TX_FIGURES

BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

N

0 75 150 FEET

1:1,800 1" = 150'

TRC

11767 KATY FREEWAY
SUITE 850
HOUSTON, TX 77079
PHONE: 713.244.1000

COORDINATE SYSTEM: NAD 1983 2011 STATEPLANE TEXAS SOUTH CENTRAL FIPS 4204 FTUS; MAP ROTATION: 0
-- SAVED BY: MBILLINGS ON 7/23/2025, 10:47:41 AM; FILE PATH: T:\1-PROJECTS\NRG\649506_WA_PARISHSTATION_TEXAS\2-APRX\PARISHSTATION_TX_FIGURES.APRX; LAYOUT NAME: FIG2-5_AIRPREHEATERPOND_8.5X11L

Appendix A

right solutions.
right partner.

10450 Stancliff Rd. Suite 210
Houston, TX 77099
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November 14, 2024

Jessica Atwell
TRC
14701 St. Mary's Lane
Suite 500
Houston, TX 77079

Work Order: **HS24110381**

Laboratory Results for: **NRG Parish Well Install**

Dear Jessica Atwell,

ALS Environmental received 2 sample(s) on Nov 07, 2024 for the analysis presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Generated By: JUMOKE.LAWAL

Andy C. Neir

Client: TRC
Project: NRG Parish Well Install
Work Order: HS24110381

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS24110381-01	MW-61R 3'-4'	Solid		07-Nov-2024 12:45	07-Nov-2024 16:35	☐
HS24110381-02	MW-61R 26-27'	Solid		07-Nov-2024 12:50	07-Nov-2024 16:35	☐

Client: TRC

Project: NRG Parish Well Install

Work Order: HS24110381

CASE NARRATIVE

Metals by Method SW6020A

Batch ID: 220344

Sample ID: HS24110062-01MS

- MS and MSD are for an unrelated sample

Metals by Method SW7471B

Batch ID: 220285

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

Wet Chemistry by Method SW9056

Batch ID: 220398

Sample ID: HS24110357-20MS

- MS and MSD are for an unrelated sample

WetChemistry by Method SW9045D

Batch ID: R499760

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

WetChemistry by Method ASTM D2216

Batch ID: R499652

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG Parish Well Install		WorkOrder:HS24110381
Sample ID:	MW-61R 3'-4'		Lab ID:HS24110381-01
Collection Date:	07-Nov-2024 12:45		Matrix:Solid

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
METALS BY SW6020A		**Method:SW6020A**			Prep:SW3050B / 11-Nov-2024		Analyst: MSC
Antimony	U		0.0603	0.464	mg/Kg	1	12-Nov-2024 20:30
Arsenic	**1.36**		**0.0650**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Barium	**105**		**0.0278**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Beryllium	**0.656**		**0.0195**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Boron	**3.39**		**0.715**	**2.32**	**mg/Kg**	1	12-Nov-2024 20:30
Cadmium	U		0.0251	0.464	mg/Kg	1	12-Nov-2024 20:30
Calcium	**3,260**		**4.60**	**46.4**	**mg/Kg**	1	12-Nov-2024 20:30
Chromium	**9.36**		**0.0213**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Cobalt	**2.99**		**0.0139**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Lead	**9.50**		**0.0121**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Lithium	**5.51**		**0.0557**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Molybdenum	**0.131**	J	**0.0167**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Selenium	**0.649**		**0.0844**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Thallium	U		0.207	0.464	mg/Kg	1	13-Nov-2024 11:59
MERCURY BY SW7471B		**Method:SW7471B**			Prep:SW7471B / 08-Nov-2024		Analyst: DH
Mercury	**11.4**		**0.496**	**3.51**	**ug/Kg**	1	11-Nov-2024 15:28
MOISTURE - ASTM D2216		**Method:ASTM D2216**					Analyst: DFF
Percent Moisture	**13.9**		**0.0100**	**0.0100**	**wt%**	1	11-Nov-2024 14:27
PH SOIL BY SW9045D		**Method:SW9045D**					Analyst: CD
pH	**8.86**		**0.100**	**0.100**	**pH Units**	1	12-Nov-2024 16:00
Temp Deg C @pH	**20.4**		**0**	**0**	**°C**	1	12-Nov-2024 16:00
ANIONS BY SW9056A		**Method:SW9056**			Prep:SW9056 / 12-Nov-2024		Analyst: HB
Chloride	**15.5**		**2.00**	**5.00**	**mg/Kg**	1	13-Nov-2024 12:21
Fluoride	**5.49**		**0.300**	**1.00**	**mg/Kg**	1	13-Nov-2024 12:21
Sulfate	**57.3**		**2.00**	**5.00**	**mg/Kg**	1	13-Nov-2024 12:21

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG Parish Well Install		WorkOrder:HS24110381
Sample ID:	MW-61R 26-27'		Lab ID:HS24110381-02
Collection Date:	07-Nov-2024 12:50		Matrix:Solid

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
METALS BY SW6020A		**Method:SW6020A**			Prep:SW3050B / 11-Nov-2024		Analyst: MSC
Antimony	**0.161**	J	**0.0618**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Arsenic	**7.81**		**0.0666**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Barium	**52.1**		**0.0285**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Beryllium	**1.09**		**0.0200**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Boron	**7.35**		**0.733**	**2.38**	**mg/Kg**	1	12-Nov-2024 20:33
Cadmium	**0.0441**	J	**0.0257**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Calcium	**41,600**		**472**	**4760**	**mg/Kg**	100	13-Nov-2024 12:31
Chromium	**22.7**		**0.0219**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Cobalt	**10.7**		**0.0143**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Lead	**12.1**		**0.0124**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Lithium	**16.8**		**0.0571**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Molybdenum	**0.507**		**0.0171**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Selenium	**0.628**		**0.0866**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Thallium	U		0.212	0.476	mg/Kg	1	13-Nov-2024 11:52
MERCURY BY SW7471B		**Method:SW7471B**			Prep:SW7471B / 08-Nov-2024		Analyst: DH
Mercury	**5.92**		**0.497**	**3.51**	**ug/Kg**	1	11-Nov-2024 15:33
MOISTURE - ASTM D2216		**Method:ASTM D2216**					Analyst: DFF
Percent Moisture	**19.7**		**0.0100**	**0.0100**	**wt%**	1	11-Nov-2024 14:27
PH SOIL BY SW9045D		**Method:SW9045D**					Analyst: CD
pH	**8.95**		**0.100**	**0.100**	**pH Units**	1	12-Nov-2024 16:00
Temp Deg C @pH	**20.2**		**0**	**0**	**°C**	1	12-Nov-2024 16:00
ANIONS BY SW9056A		**Method:SW9056**			Prep:SW9056 / 12-Nov-2024		Analyst: HB
Chloride	**44.9**		**1.99**	**4.97**	**mg/Kg**	1	14-Nov-2024 03:50
Fluoride	**2.32**		**0.298**	**0.994**	**mg/Kg**	1	14-Nov-2024 03:50
Sulfate	**83.0**		**1.99**	**4.97**	**mg/Kg**	1	14-Nov-2024 03:50

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Weight / Prep Log

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

Batch ID: 220285 **Start Date:** 08 Nov 2024 10:17 **End Date:** 08 Nov 2024 10:17
Method: MERCURY PREP - SOLID - 7471B **Prep Code:** HG_S_LOWPR

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS24110381-01		0.5688 (grams)	40 (mL)	70.32	4-oz glass, Neat
HS24110381-02		0.5678 (grams)	40 (mL)	70.45	4-oz glass, Neat

Batch ID: 220344 **Start Date:** 11 Nov 2024 08:00 **End Date:** 11 Nov 2024 08:00
Method: METALS PREP - SOLIDS - SW3050B **Prep Code:** 3050_I_LOW

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS24110381-01		0.5388 (g)	50 (mL)	92.8	4-oz glass, Neat
HS24110381-02		0.5255 (g)	50 (mL)	95.15	4-oz glass, Neat

Batch ID: 220398 **Start Date:** 12 Nov 2024 07:55 **End Date:** 12 Nov 2024 07:55
Method: 9056 ANIONS SOIL PREP **Prep Code:** 9056_S_PR

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS24110381-01		5.0009 (g)	50 (mL)	9.998	4-oz glass, Neat
HS24110381-02		5.0321 (g)	50 (mL)	9.936	4-oz glass, Neat

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: 220285 (0)	**Test Name :** MERCURY BY SW7471B				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		08 Nov 2024 10:17	11 Nov 2024 15:28	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		08 Nov 2024 10:17	11 Nov 2024 15:33	1
Batch ID: 220344 (0)	**Test Name :** METALS BY SW6020A				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		11 Nov 2024 08:00	13 Nov 2024 11:59	1
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		11 Nov 2024 08:00	12 Nov 2024 20:30	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		11 Nov 2024 08:00	13 Nov 2024 12:31	100
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		11 Nov 2024 08:00	13 Nov 2024 11:52	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		11 Nov 2024 08:00	12 Nov 2024 20:33	1
Batch ID: 220398 (0)	**Test Name :** ANIONS BY SW9056A				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		12 Nov 2024 07:55	13 Nov 2024 12:21	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		12 Nov 2024 07:55	14 Nov 2024 03:50	1
Batch ID: R499652 (0)	**Test Name :** MOISTURE - ASTM D2216				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45			11 Nov 2024 14:27	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50			11 Nov 2024 14:27	1
Batch ID: R499760 (0)	**Test Name :** PH SOIL BY SW9045D				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45			12 Nov 2024 16:00	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50			12 Nov 2024 16:00	1

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220285 (0) **Instrument:** HG04 **Method:** MERCURY BY SW7471B

MBLK Sample ID: **MBLK-220285** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:52**
Client ID: Run ID: **HG04_499583** SeqNo: **8507469** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	1.067	3.32								J

LCS Sample ID: **LCS-220285** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:54**
Client ID: Run ID: **HG04_499583** SeqNo: **8507470** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	337.3	3.32	333.3	0	101	85 - 115				

MS Sample ID: **HS24110339-01MS** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:57**
Client ID: Run ID: **HG04_499583** SeqNo: **8507472** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	397.9	3.48	348.4	37.79	103	85 - 115				

MSD Sample ID: **HS24110339-01MSD** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:59**
Client ID: Run ID: **HG04_499583** SeqNo: **8507473** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	396.8	3.50	350.5	37.79	102	85 - 115	397.9	0.285	20	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

MBLK Sample ID: **MBLK-220344** Units: **mg/Kg** Analysis Date: **12-Nov-2024 19:58**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518799** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	U	0.497								
Arsenic	U	0.497								
Barium	U	0.497								
Beryllium	U	0.497								
Boron	U	2.49								
Cadmium	U	0.497								
Calcium	U	49.7								
Chromium	U	0.497								
Cobalt	U	0.497								
Lead	U	0.497								
Lithium	U	0.497								
Molybdenum	U	0.497								
Selenium	U	0.497								
Thallium	U	0.497								

LCS Sample ID: **LCS-220344** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:00**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518800** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	9.149	0.497	9.932	0	92.1	80 - 120				
Arsenic	9.451	0.497	9.932	0	95.1	80 - 120				
Barium	9.335	0.497	9.932	0	94.0	80 - 120				
Beryllium	9.673	0.497	9.932	0	97.4	80 - 120				
Boron	47.36	2.48	49.66	0	95.4	80 - 120				
Cadmium	9.274	0.497	9.932	0	93.4	80 - 120				
Calcium	927.6	49.7	993.2	0	93.4	80 - 120				
Chromium	9.272	0.497	9.932	0	93.4	80 - 120				
Cobalt	9.372	0.497	9.932	0	94.4	80 - 120				
Lead	9.424	0.497	9.932	0	94.9	80 - 120				
Lithium	9.329	0.497	9.932	0	93.9	80 - 120				
Molybdenum	9.035	0.497	9.932	0	91.0	80 - 120				
Selenium	9.439	0.497	9.932	0	95.0	80 - 120				
Thallium	8.893	0.497	9.932	0	89.5	80 - 120				

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

MS Sample ID: **HS24110062-01MS** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:15**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518830** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	6.629	0.474	9.471	0.7615	61.9	75 - 125				S
Arsenic	29.15	0.474	9.471	18.57	112	75 - 125				
Barium	152.6	0.474	9.471	149.3	34.5	75 - 125				SO
Beryllium	10.73	0.474	9.471	1.227	100	75 - 125				
Boron	45.07	2.37	47.36	6.499	81.5	75 - 125				
Cadmium	9.454	0.474	9.471	0.4038	95.5	75 - 125				
Calcium	14700	47.4	947.1	14780	-8.68	75 - 125				SO
Chromium	38.89	0.474	9.471	25.29	144	75 - 125				S
Cobalt	16.53	0.474	9.471	6.896	102	75 - 125				
Lead	123.3	0.474	9.471	96	288	75 - 125				SO
Lithium	20.74	0.474	9.471	10.31	110	75 - 125				E
Molybdenum	9.214	0.474	9.471	0.9538	87.2	75 - 125				
Selenium	10.35	0.474	9.471	1.466	93.8	75 - 125				

MS Sample ID: **HS24110062-01MS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:44**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520246** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Thallium	7.282	0.474	9.471	0.2701	74.0	75 - 125				S

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

MSD Sample ID: **HS24110062-01MSD** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:18**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518831** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	4.836	0.469	9.376	0.7615	43.5	75 - 125	6.629	31.3	20	SR
Arsenic	26.2	0.469	9.376	18.57	81.4	75 - 125	29.15	10.6	20	
Barium	101.1	0.469	9.376	149.3	-514	75 - 125	152.6	40.5	20	SRO
Beryllium	9.769	0.469	9.376	1.227	91.1	75 - 125	10.73	9.42	20	
Boron	51.59	2.34	46.88	6.499	96.2	75 - 125	45.07	13.5	20	
Cadmium	9.036	0.469	9.376	0.4038	92.1	75 - 125	9.454	4.52	20	
Calcium	18320	46.9	937.6	14780	377	75 - 125	14700	21.9	20	SREO
Chromium	38.06	0.469	9.376	25.29	136	75 - 125	38.89	2.15	20	S
Cobalt	16.54	0.469	9.376	6.896	103	75 - 125	16.53	0.0872	20	
Lead	104.4	0.469	9.376	96	89.7	75 - 125	123.3	16.6	20	O
Lithium	18.63	0.469	9.376	10.31	88.7	75 - 125	20.74	10.7	20	
Molybdenum	8.434	0.469	9.376	0.9538	79.8	75 - 125	9.214	8.84	20	
Selenium	10.03	0.469	9.376	1.466	91.3	75 - 125	10.35	3.16	20	

MSD Sample ID: **HS24110062-01MSD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:47**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520247** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Thallium	7.099	0.469	9.376	0.2701	72.8	75 - 125	7.282	2.55	20	S

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

PDS Sample ID: **HS24110062-01PDS** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:20**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518832** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	9.917	0.481	9.628	0.7615	95.1	75 - 125				
Arsenic	27.95	0.481	9.628	18.57	97.3	75 - 125				
Barium	159.8	0.481	9.628	149.3	109	75 - 125				O
Beryllium	10.89	0.481	9.628	1.227	100	75 - 125				
Boron	56.88	2.41	48.14	6.499	105	75 - 125				
Cadmium	9.685	0.481	9.628	0.4038	96.4	75 - 125				
Calcium	15660	48.1	962.8	14780	91.2	75 - 125				O
Chromium	34.91	0.481	9.628	25.29	100.0	75 - 125				
Cobalt	16.55	0.481	9.628	6.896	100	75 - 125				
Lead	104.5	0.481	9.628	96	88.2	75 - 125				O
Molybdenum	10.09	0.481	9.628	0.9538	94.9	75 - 125				
Selenium	11.1	0.481	9.628	1.466	100	75 - 125				

PDS Sample ID: **HS24110062-01PDS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:54**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520250** PrepDate: **11-Nov-2024** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Lithium	56.08	2.41	48.14	10.12	95.5	75 - 125				

PDS Sample ID: **HS24110062-01PDS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:49**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520248** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Thallium	9.363	0.481	9.628	0.2701	94.4	75 - 125				

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

SD Sample ID: **HS24110062-01SD** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:13**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518829** PrepDate: **11-Nov-2024** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Antimony	0.8346	2.41					0.7615	0	10	J
Arsenic	19.53	2.41					18.57	5.15	10	
Barium	155.3	2.41					149.3	4.03	10	
Beryllium	1.251	2.41					1.227	0	10	J
Boron	8.563	12.0					6.499	0	10	J
Cadmium	0.4212	2.41					0.4038	0	10	J
Calcium	14990	241					14780	1.41	10	
Chromium	25.62	2.41					25.29	1.3	10	
Cobalt	7.369	2.41					6.896	6.87	10	
Lead	99.46	2.41					96	3.6	10	
Molybdenum	0.9704	2.41					0.9538	0	10	J
Selenium	1.638	2.41					1.466	0	10	J

SD Sample ID: **HS24110062-01SD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:57**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520251** PrepDate: **11-Nov-2024** DF: **25**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Lithium	10.99	12.0					10.12	0	10	J

SD Sample ID: **HS24110062-01SD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:42**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520245** PrepDate: **11-Nov-2024** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Thallium	U	2.41					0.2701	0	10	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220398 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY SW9056A

MBLK Sample ID: **MBLK-220398** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:41**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521384** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	U	5.00								
Fluoride	U	1.00								
Sulfate	2.013	5.00								J

LCS Sample ID: **LCS-220398** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:49**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521385** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	200.7	5.00	200	0	100	80 - 120				
Fluoride	42.08	1.00	40	0	105	80 - 120				
Sulfate	208.3	5.00	200	0	104	80 - 120				

MS Sample ID: **HS24110357-20MS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 12:05**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521387** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	994.2	4.97	99.45	908.7	86.0	80 - 120				O
Fluoride	35.61	0.995	19.89	10.87	124	80 - 120				S
Sulfate	122.1	4.97	99.45	6.445	116	80 - 120				

MSD Sample ID: **HS24110357-20MSD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 12:13**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521388** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	996.9	4.97	99.35	908.7	88.7	80 - 120	994.2	0.265	20	EO
Fluoride	35.79	0.993	19.87	10.87	125	80 - 120	35.61	0.484	20	S
Sulfate	121.8	4.97	99.35	6.445	116	80 - 120	122.1	0.261	20	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: R499652 (0) **Instrument:** Balance1 **Method:** MOISTURE - ASTM D2216

DUP Sample ID: **HS24110389-04DUP** Units: **wt%** Analysis Date: **11-Nov-2024 14:27**
Client ID: Run ID: **Balance1_499652** SeqNo: **8509159** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Percent Moisture	14.7	0.0100					14.5	1.37	20	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: **R499760 (0)** **Instrument:** **WetChem_HS** **Method:** **PH SOIL BY SW9045D**

DUP Sample ID: **HS24110381-01DUP** Units: **pH Units** Analysis Date: **12-Nov-2024 16:00**
Client ID: **MW-61R 3'-4'** Run ID: **WetChem_HS_499760** SeqNo: **8519095** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
pH	8.89	0.100					8.86	0.338	10	
Temp Deg C @pH	20.4	0					20.4	0	10	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client:	TRC	**QUALIFIERS, ACRONYMS, UNITS**
Project:	NRG Parish Well Install	
WorkOrder:	**HS24110381**	

Qualifier	Description
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte detected below quantitation limit
M	Manually integrated, see raw data for justification
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL/SDL

Acronym	Description
DCS	Detectability Check Study
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitaion Limit
SD	Serial Dilution
SDL	Sample Detection Limit
TRRP	Texas Risk Reduction Program

CERTIFICATIONS,ACCREDITATIONS & LICENSES

Agency	Number	Expire Date
Arizona	AZ0793	27-May-2025
Arkansas	88-00356_2024	27-Mar-2025
California	2919; 2025	30-Apr-2025
Dept of Defense	L24-240	30-Apr-2026
Dept of Defense	L24-239	30-Apr-2026
Florida	E87611-38	30-Jun-2025
Illinois	2000322023-11	31-Jul-2025
Kansas	E-10352 2023-2024	31-Jul-2025
Kentucky	123043	30-Apr-2025
Louisiana	03087 2023-2024	30-Jun-2025
Maine	2024017	23-Jun-2026
Michigan	9971	30-Apr-2025
Nebraska	NE-OS-25-13	30-Apr-2025
New Jersey	TX008	30-Jun-2025
North Carolina	624 - 2024	31-Dec-2024
Pennsylvania	018	30-Jun-2025
Tennessee	04016	30-Apr-2025
Texas	T104704231 TX-C24-00130	30-Apr-2025
Utah	TX026932023-14	31-Jul-2025

Sample Receipt Checklist

Work Order ID:	HS24110381	**Date/Time Received:**	**07-Nov-2024 16:35**
Client Name:	TRC-HOU	**Received by:**	**Travis Appling**

Completed By:	*/S/ Travis Appling*	07-Nov-2024 17:46	**Reviewed by:**	*/S/ Alexis Dorenbosch*	08-Nov-2024 10:53
	eSignature	Date/Time		eSignature	Date/Time

Matrices: **S** Carrier name: **Client**

	Yes	No	
Shipping container/cooler in good condition?	☑	☐	Not Present ☐
Custody seals intact on shipping container/cooler?	☐	☐	Not Present ☑
Custody seals intact on sample bottles?	☐	☐	Not Present ☑
VOA/TX1005/TX1006 Solids in hermetically sealed vials?	☐	☐	Not Present ☑
Chain of custody present?	☑	☐	1 Page(s)
Chain of custody signed when relinquished and received?	☑	☐	COC IDs:329698
Samplers name present on COC?	☑	☐	
Chain of custody agrees with sample labels?	☑	☐	
Samples in proper container/bottle?	☑	☐	
Sample containers intact?	☑	☐	
Sufficient sample volume for indicated test?	☑	☐	
All samples received within holding time?	☑	☐	
Container/Temp Blank temperature in compliance?	☑	☐	

Temperature(s)/Thermometer(s):	0.8UC/ 0.8C	IR36
Cooler(s)/Kit(s):	50741	
Date/Time sample(s) sent to storage:	11/7/2024 17:46	

	Yes	No	
Water - VOA vials have zero headspace?	☐	☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	☐	☐	N/A ☑
pH adjusted?	☐	☐	N/A ☑

pH adjusted by:

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

Corrective Action:

ALS

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Chain of Custody Form

Page 1 of 1

COC ID: 329698

TRC
NRG Parish Well Install

ALS Project Manager:

Customer Information		Project Information			
Purchase Order		Project Name		A	
Work Order		Project Number		B	
Company Name		Bill To Company		C	
Send Report To		Invoice Attn		D	
Address		Address		E	
				F	
City/State/Zip		City/State/Zip		G	
Phone		Phone		H	
Fax		Fax		I	
e-Mail Address		e-Mail Address		J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	MW-61R 3'-4'	11/07/24	1245	S	—	1	X	X	X	X	X						
2	MW-61R 26-27'	11/07/24	1250	S	—	1	X	X	X	X	X						
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign: Candida Conde [signature]

Shipment Method:

Required Turnaround Time: (Check Box)

Results Due Date:

Relinquished by: [signature]	Date: 11/07/24	Time: 1635	Received by:	Notes:
Relinquished by:	Date: 11/7/24	Time: 1635	Received by (Laboratory): [signature] TJA	
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory):	

Cooler ID	Cooler Temp.	QC Package: (Check One Box Below)
	CF 0°	
50141	0.8	
	IR36	

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

Note:
1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited to the terms and conditions stated on the reverse.
3. The Chain of Custody is a legal document. All information must be completed accurately.

Texas Commission on Environmental Quality

Waste Permits Division Correspondence Cover Sheet

Date: July 28, 2025
Facility Name: NRG-WA Parish Generating Station
Permit or Registration No.: CCR108

Nature of Correspondence:
☒ Initial/New
☐ Response/Revision to TCEQ Tracking No.: ______ (from subject line of TCEQ letter regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Notifications
☐ New Notice of Intent	☐ Alternative Daily Cover Report
☐ Notice of Intent Revision	☐ Closure Report
☐ New Permit (including Subchapter T)	☐ Compost Report
☐ New Registration (including Subchapter T)	☒ Groundwater Alternate Source Demonstration
☐ Major Amendment	☐ Groundwater Corrective Action
☐ Minor Amendment	☐ Groundwater Monitoring Report
☐ Limited Scope Major Amendment	☐ Groundwater Background Evaluation
☐ Notice Modification	☐ Landfill Gas Corrective Action
☐ Non-Notice Modification	☐ Landfill Gas Monitoring
☐ Transfer/Name Change Modification	☐ Liner Evaluation Report
☐ Temporary Authorization	☐ Soil Boring Plan
☐ Voluntary Revocation	☐ Special Waste Request
☐ Subchapter T Disturbance Non-Enclosed Structure	☐ Other:
☐ Other:	

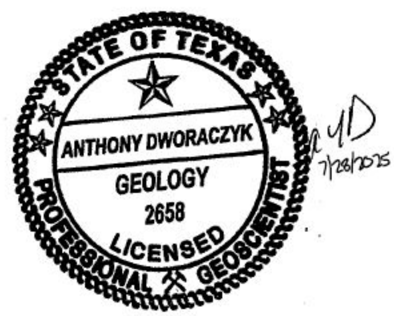
Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
☐ New	☐ Annual/Biennial Site Activity Report
☐ Renewal	☐ CPT Plan/Result
☐ Post-Closure Order	☐ Closure Certification/Report
☐ Major Amendment	☐ Construction Certification/Report
☐ Minor Amendment	☐ CPT Plan/Result
☐ CCR Registration	☐ Extension Request
☐ CCR Registration Major Amendment	☐ Groundwater Monitoring Report
☐ CCR Registration Minor Amendment	☐ Interim Status Change
☐ Class 3 Modification	☐ Interim Status Closure Plan
☐ Class 2 Modification	☐ Soil Core Monitoring Report
☐ Class 1 ED Modification	☐ Treatability Study
☐ Class 1 Modification	☐ Trial Burn Plan/Result
☐ Endorsement	☐ Unsaturated Zone Monitoring Report
☐ Temporary Authorization	☐ Waste Minimization Report
☐ Voluntary Revocation	☐ Other:
☐ 335.6 Notification	
☐ Other:	

I hereby certify that the alternative source demonstration presented within this document for the NRG WA Parish Coal Ash Disposal Landfill CCR Unit has been prepared to meet the requirements of 30 TAC 352.4; 352.941(c); and 352.1321. This document is accurate and has been prepared in accordance with good geosciences practices, including the consideration of applicable industry standards, and with the requirements of 30 TAC 352.4; 352.941(c); and 352.1321.

Name: Tony Dworaczyk **Expiration Date:** 1/30/2026

Company: TRC Environmental Corporation **Date:** 7/28/2025



Alternative Source Demonstration

W.A. Parish Electric Generating Station
FGD Emergency Pond (SWMU 020)

July 2025

Prepared For
NRG Texas Power, LLC
Thompsons, Texas
TCEQ Coal Combustion Residuals (CCR) Registration No. CCR108
Industrial Solid Waste Registration No. 31631
EPA Identification No. TXD097311849

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Executive Summary

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas. Units managing coal combustion residuals (CCR) at the Station are subject to the requirements of 30 Texas Administrative Code (TAC) Chapter 352. CCR generated at the Station consists of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge. The Site has three active CCR management units that are subject to regulation under 30 TAC Chapter 32, including the FGD Emergency Pond (E Pond), which is the subject of this Alternate Source Demonstration (ASD).

The 16th semi-annual groundwater detection monitoring event was conducted on February 28, 2025. Verification sampling was performed on April 30, 2025. Statistical evaluation of the results was performed to identify apparent statistically significant increases (SSIs) above background pursuant to 30 TAC 352 Subpart H. Boron, calcium, sulfate, and total dissolved solids (TDS) were initially identified as apparent SSIs for the February 28, 2025, sampling event at three monitoring wells (MW-37, MW-38R, and MW-61). NRG notified the Texas Commission Environmental Quality (TCEQ) of its intent to prepare an ASD.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the second half 2019 (July) through the first half 2021 (April). February 28, 2025, semi-annual detection monitoring event analytical results, including the April 30, 2025, verification sampling results are the sixth data set statistically evaluated using the new background water quality data set.

This ASD has identified alternative sources for apparent SSIs at the E Pond, based on the following lines of reasoning:

- The bottom of the E Pond clay liner is separated from the upper aquifer system by a confining unit that hydraulically isolates the bottom of the E Pond from the upper aquifer system. Improperly installed or damaged monitoring wells may have historically provided a conduit for CCR constituents to migrate into the upper aquifer system.
- The former, historical presence of CCR materials in the vicinity of the monitoring wells prior to their modification to include risers from the ground surface provided an opportunity for surface materials to inadvertently enter the wells directly from the ground surface.
- Water quality improved incrementally with each improvement to the CCR groundwater monitoring network over time. In July 2019, MW-38 was severely damaged by mobile plant equipment. MW-38 was abandoned and MW-38R was installed adjacent to the former location of MW-38. Analytical data for August 2019 for MW-38R indicates significantly improved overall groundwater quality data.

- It appears that the construction activities that occurred during the retrofit of the E Pond per the federal CCR Rule and the Closure Plan during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer as follows:
  - As a result of removal of water from the E Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
  - Excavation of all CCR and decontamination of the E Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
  - Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
  - As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.
- As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.
- Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition; and
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Therefore, based on the lines of reasoning presented in this ASD, alternative sources other than a release from the E Pond have been shown to be responsible for each of the seven apparent SSIs observed. Based on this successful ASD, NRG will continue performing semi-annual detection monitoring for the E Pond per 30 TAC Chapter 352.

Section 1
Introduction

1.1 Background

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas, adjacent to Smithers Lake. The electricity generating portion of the Station, or the main Plant Operations Area (Plant Area), is located along the southeastern shore of the lake.

Management of coal combustion residuals (CCR) at the Station is performed pursuant to 30 Texas Administrative Code (TAC) Chapter 352, which became effective during June 2021. Prior to this, management of CCR was performed pursuant to the United States Environmental Protection Agency (USEPA) final rule for the regulation and management of CCR under the Resource Conservation and Recovery Act (RCRA) Title 40, Code of Federal Regulations, Part 257 (40 CFR §257) (CCR Rule, effective date October 19, 2015).

CCR generated at the Station consist of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge, which have been classified by the TCEQ as Class II nonhazardous waste. The Station has the following three active CCR-management units:

- Solid Waste Disposal Area (SWDA) (SWMU 001), which consists of four active CCR-management cells: Cell 1C, Cell 2A-Pug Mill, Cell 2B, and Cell 3; and is now monitored as a single CCR Multiunit;
- Air Preheater Pond (APH Pond, SWMU 021); and
- FGD Emergency Pond (E Pond, SWMU 020).

The E Pond receives storm water runoff from the FGD dewatering area and blowdown from the FGD system. The E Pond may also receive the contents of an FGD process vessel when the FGD system is not in operation.

1.1.1 Retrofit Construction Activities

During 2020 and 2021, the E Pond was removed from service and retrofitted per §257.102(k) of the federal CCR Rule. As part of these activities, the CCR within the impoundment was dewatered, all water and CCR was removed from the impoundment, and the E Pond area was decontaminated based on over-excavating a minimum of 6-inches of clay liner material after removal of CCR. After CCR removal and decontamination had been confirmed, a federal CCR Rule bottom composite liner system was then installed, and the E Pond was placed back into service as a CCR unit compliant with both the federal and TCEQ CCR programs.

During retrofit construction activities, it appears that the geochemistry and hydrogeology of the uppermost aquifer were altered as follows:

- As a result of removal of water from the E Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
- Excavation of all CCR and decontamination of the E Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
- Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
- As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.

As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.

1.1.2 Groundwater Monitoring Program

On behalf of NRG, Environmental Resources Management, Inc. (ERM) conducted eight independent background groundwater detection monitoring events for both the Appendix III and IV CCR constituents between April 2015 and August 2017 per §257.94(b) of the federal CCR Rule and the first semi-annual detection monitoring event in October 2017. Results of the eight background and first semi-annual detection monitoring events for the E Pond were documented in the *Annual Groundwater Monitoring Report, FGD Emergency Pond (Unit 020)* (ERM 2018a) and the March 1, 2018, *Groundwater Monitoring Report, FGD Emergency Pond (SWMU Unit 020)* (ERM 2018b) pursuant to §257.90(e).

The Station has continued to conduct semi-annual detection monitoring at the E Pond per the federal CCR Rule and 30 TAC Chapter 352. As of February 28, 2025, sampling event and verification sampling on April 30, 2025, a total of 16 semi-annual detection monitoring events have now been performed. Following each semi-annual detection monitoring sampling event, the results have been evaluated for potential SSIs, and ASDs have been prepared as needed. Since implementation of 30 TAC Chapter 352, the ASDs have been submitted to TCEQ for review and approval. The semi-annual detection monitoring activities and ASDs have been included in the Annual Groundwater Monitoring and Corrective Action reports, which have been placed into the Facility Operating Record (FOR) and posted to NRG's publicly accessible website.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the third half 2019 (July) through the first half 2021 (April). The February 28, 2025, semi-annual detection monitoring event and April 30, 2025, verification sampling analytical results are the eighth data set statistically evaluated using the new background water quality data set.

Since initial installation of the CCR groundwater monitoring network for the E Pond, improvements to the network have been implemented to improve the operation of the network. These improvements are identified below:

- During the second semi-annual detection monitoring event, surface CCR may have been inadvertently introduced into the monitoring wells and the laboratory analytical sample containers during the initial background and semi-annual detection monitoring events. To mitigate this potential issue, the flush-mounted monitoring wells at the E Pond were modified before the third semi-annual detection monitoring event was performed with the installation of vertical well casing extensions and protective casings;
- During the third semi-annual detection monitoring event, silt was observed in the monitoring wells at the E Pond. The wells were redeveloped, and accumulated silt was removed from the well casings prior to performance of the fourth semi-annual detection monitoring event; and
- In July 2019, MW-38 was severely damaged by mobile plant equipment. MW-38 was abandoned and MW-38R was installed adjacent to the location of former MW-38.

1.2 Purpose

TRC prepared this ASD on behalf of NRG to evaluate apparent SSIs above background levels for the 16th semi-annual detection monitoring event in accordance with 30 TAC Chapter 352.

Section 2
Site Geology and Hydrogeology

This section provides information about the geology and hydrogeology of the Station and the area at and surrounding the E Pond.

2.1 Hydrogeology

Based on the *Geologic Atlas of Texas, Houston Sheet* (BEG 1982), the Station is underlain by alluvium and the Beaumont formation (also commonly referred to as the Beaumont Clay). The alluvium is present along the Brazos River, which is located approximately 0.9 miles from the northern boundary of the SWDA CCR units. Both the alluvium and the Beaumont formation are composed of clay, silt, and sand; and may include stream channel, point-bar, natural levee, back swamp, coastal marsh, and mud-flat deposits. The thickness of the Beaumont formation is approximately 100 feet. The alluvium is not present at the Plant Area which is consistent with this area being located outside of the Brazos River floodplain zone (FBC 2018). The APH Pond and the E Pond are both located at the Plant Area.

The alluvium and the Beaumont Formation are located within the upper unit of the Chicot aquifer system. At most locations throughout Fort Bend County, the Chicot aquifer system is under confined conditions (TWDB 1990). The Chicot aquifer system is primarily recharged by precipitation at locations where it outcrops in Austin, Harris, and Waller Counties; groundwater then flows laterally within Fort Bend County (TWDB 1990). Site investigations performed by others on behalf of NRG also indicate that the uppermost groundwater-bearing units at the Site are under confined conditions (ERM 2017a).

Environmental site investigations conducted in May 2016 and November 2016 identified three main subsurface strata at the Station, which were designated as Stratum DA-1 through DA-3 at the SWDA and Stratum PA-1 through PA-3 at the Plant Area (APH Pond and E Pond). The strata are fully described in the October 2017 *CCR Groundwater Monitoring Networks* report (ERM 2017b) and are summarized below.

2.1.1 Stratum PA-1 (Upper Confining Unit)

Stratum PA-1 is predominately silty clay with some sandy clay, clay, and sandy silt. Stratum PA-1 is present from the ground surface to depths ranging from 15 feet bgs to 32 feet bgs.

Stratum PA-1 serves as a confining unit to underlying Stratum PA-2, which comprises the uppermost groundwater-bearing unit at the APH Pond and E Pond. Geotechnical laboratory testing indicates that the hydraulic conductivity of Stratum PA-1 is 2.03E-08 centimeters per second (cm/sec) (ERM 2017b).

2.1.2 Stratum PA-2 (Upper Aquifer)

Stratum PA-2 is predominantly silty sand with varying sand and silt content and trace clay. Stratum PA-2 is generally greater than 10 feet in thickness with bottom depths ranging from 60 to 80 feet bgs.

Stratum PA-2 is saturated and comprises the uppermost groundwater-bearing unit at the APH Pond and E Pond. CCR monitoring wells in the Plant Area are completed within Stratum PA-2. Slug testing results for CCR monitoring wells indicate hydraulic conductivity ranges from 6.68E-04 cm/sec to 4.26E-02 cm/sec in Stratum PA-2 (ERM 2017b). Groundwater primarily flows to the southwest beneath the E Pond, and to the southeast beneath the APH Pond.

2.1.3 Stratum PA-3 (Lower Confining Unit)

Stratum PA-3 is predominantly clay to silty clay. This stratum appears to be the bottom confining layer to the overlying groundwater-bearing units (Stratum PA-2). The thicknesses of Stratum PA-3 has not been defined.

2.1.4 E Pond – Certified Monitoring Network

The certified CCR groundwater monitoring well network for the E Pond consists of five groundwater monitoring wells:

- Upgradient monitoring wells MW-36 and MW-60; and
- Downgradient monitoring wells MW-37, MW-38R, and MW-61.

The wells were completed into Stratum PA-2. A groundwater potentiometric surface map was prepared by TRC for the March 1, 2024, semi-annual detection monitoring event and is provided in this ASD as Figure 2. Historically, groundwater flows to the southwest beneath the E Pond at a gradient ranging from 0.010 feet per foot (ft/ft) to 0.030 ft/ft.

2.2 Site Specific Information

Subsurface data from a soil boring recently installed as part of the current monitoring network at the nearby Emergency Pond (E-Pond) at the Station indicate that the subsurface geology beneath the W.A. Parish generating facility consists predominately of clays, silty clays with sandy clay, sandy silt, and sands and is consistent across the Station (ERM, Groundwater Monitoring networks, October 2017).

During the original installation of monitor wells for the W.A. Parish CCR monitoring networks, soil samples were not collected for Appendix III & IV CCR constituent analyses. In November 2024, monitor well MW-61R was installed at the E-Pond to replace MW-61 as part of the construction of a Zero Liquid Discharge (ZLD) wastewater treatment facility required under the Effluent Limitation Guidelines (ELG) for coal-fired power plants. During the installation of MW-61R, soil samples of native subsurface soils were collected on November 7, 2024, and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron, calcium and sulfate, which are the apparent SSIs for this 16th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4' bgs	27-27'bgs
Boron	3.39 mg/kg	7.35 mg/Kg
Calcium	3,260 mg/kg	41,600 mg/kg
Sulfate	57.3 mg/Kg	83.0 mg/Kg

Based on the consistency of the subsurface soils at the APH Pond and the E-Pond, and the close proximity of the APH Pond to the E-Pond, the subsurface soil laboratory analytical results for the E-Pond are considered to be representative for both CCR Units. The laboratory analytical report is included as Appendix A of this ASD. As shown in the above table, the concentrations of boron, calcium, and sulfate in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

2.3 Groundwater Geochemistry

Understanding the geochemistry of groundwater is essential to examining the groundwater monitoring data, explaining the relationships between the characteristics of the groundwater, and analyzing both natural and potential anthropogenic impacts on groundwater. Separate from potential source areas of contamination, geochemical processes are critical in controlling the chemical composition of groundwater, including carbonate equilibrium, oxidation-reduction reactions, and adsorption-desorption processes. Based on the hydrogeology of the E Pond, potential SSIs in groundwater including boron, calcium, sulfate, and total dissolved solids (TDS) are discussed in the subsections below.

2.3.1 Boron in Groundwater

Boron is normally considered to be a minor constituent in groundwater since it is generally present in low concentrations (Palmucci & Rusi, 2014). Apart from a potential boron source area, the primary origin of boron in groundwater is typically associated with the processes of sorption and desorption from mineral surfaces including soil and bedrock (Ravenscroft & McArthur, 2004). Boron is often cited as a contaminant trace chemical and usually occurs as a non-ionized form as H_3BO_3 in soils at pH <8.5, but above this pH, it exists as an anion, $B(OH)_4^-$ (Upadhyaya et al., 2014).

The factors that may influence the concentration of boron in groundwater include weathering, human activity, evaporative concentration, ion-exchange, electrical conductivity (EC), and pH. Ravenscroft &

McArthur (2004) investigated the mechanism of regional boron enrichment in groundwater and the results indicated that the main process resulting in boron enrichment in groundwater was flushing by fresh groundwater. The desorption of boron from mineral surfaces could be affected by pH, ionic strength, salinity, and the HCO_3/CO_3 ratio. Decreases in pH will increase the dissolution of boron from the mineral surfaces. Boron adsorption favors high pH and boron desorption favors low pH in rocks, soils, and organic matters (Hollis et al., 1988; Keren & Communar, 2009; Tabelin et al., 2014).

Additional investigations confirmed that the presence of boron in groundwater depends on the EC (salinity), such that the concentration of boron increases with increasing EC. Halim et al. (2010) reported that the increae in Cl^- contributes to an increase in EC value since a strong linear correlation ($R^2 = 0.88$) between EC and Cl^- was observed. Palmucci & Rusi (2014) observed a clear correlation between elevated concentrations of boron and the chloride-sodium facies, which are characterized by high saline content, negative redox potential, and low value of the SO_4^{2-}/Cl^- ratio. Rodriguez-Espinosa et al. (2020) determined that the concentration of boron in groundwater was related to SO_4^{2-} and the age affect.

Regarding the concentration of boron in groundwater at the E Pond, the source of boron is natural rather than anthropogenic. Therefore, the increase in concentration of boron is related to natural variations in groundwater geochemistry, such as pH, ion exchanges, EC, and salinity.

2.3.2 Calcium in Groundwater

Calcium is one of the most important ionic constituents in groundwater (Razowska-jaworek, 2014). Water-rock interaction occurs when water interacts with minerals in soils or rocks, such as limestone, marble, calcite, dolomite, gypsum, fluorite, and apatite. Natural dissolution of carbonate rocks and minerals is the primary source of calcium in groundwater (Jiang et al., 2009). Calcium is an important determinant of water hardness (Ca^{2+}), while magnesium is the other hardness determinant. The most common shallow groundwater type is Ca-HCO_3 dominated and Ca(Mg)-HCO_3 dominated.

A literature review indicates the major factors that may influence the calcium concentration in groundwater include rock weathering, soil pH, electrical conductivity (EC), and anthropogenic activities (mining, concrete material dissolution, fertilizer etc.) (Hájek et al., 2021; Schot & Wassen, 1993; Shi et al., 2018).

Regarding the concentrations of calcium in groundwater, the source of calcium appears to be natural rather than anthropogenic. Therefore, the increase in concentration of calcium is related to natural variations in groundwater geochemistry associated with rock weathering, soil pH, and EC.

2.3.3 Sulfate in Groundwater

The presence of sulfate is ubiquitous in groundwater, having both natural and anthropogenic sources. There are many potential sources of sulfate in groundwater including mineral dissolution, atmospheric deposition, and other anthropogenic sources (mining, fertilizer, synthetic detergents, industrial wastewater etc.) (Miao et al., 2012). As groundwater moves through soil and rock formations that contain sulfate minerals, a portion of the sulfate dissolves into the groundwater. Minerals that contain sulfate include magnesium sulfate (Epsom salt), sodium sulfate (Glauber's salt), and calcium sulfate (gypsum). Gypsum is an important contributor to elevated concentrations of sulphate in groundwater aquifers. Elevated concentrations of sulfate in groundwater are common in the western part of the United States (MDH, 2008).

Sulfate is mobile in soil and can impact groundwater quality. Multiple investigations have indicated that atmospheric deposition, dissolution of gypsum, and oxidation of sulfide minerals can contribute to the concentrations of sulfate in groundwater.

Regarding the concentration of sulfate in groundwater at the E-Pond, the source of sulfate is natural rather than anthropogenic. Therefore, the increase in concentration of sulfate are related to natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition (Einsiedl & Mayer, 2005; Pu et al., 2012).

2.3.4 TDS

Total dissolved solids (TDS) represent the combined total of inorganic and organic substances present in groundwater, and TDS can be a general indicator of water quality. These solids typically consist of minerals, salts, and organic matter, which may originate from sources such as weathering of minerals, storm water runoff, sewage, effluent discharges, agriculture, decaying organisms, and anthropogenic sources. Common salts that contribute to TDS are sodium, chloride, calcium, magnesium, potassium, sulfate, and bicarbonate. (Olumuyiwa I. Ojo, 2012)

TDS concentrations in groundwater is usually higher than surface water due to the longer contact time for groundwater with underlying soil and rocks. Since many minerals are water soluble, high concentrations can accumulate over time through the processes of precipitation and evaporation.

TDS is related to other water quality parameters such as hardness, which may occur if an elevated concentration of TDS is associated with the presence of carbonates. Research investigations have evaluated the relationship between TDS and other groundwater parameters such as EC and salinity (Atekwana et al., 2004; Banadkooki et al., 2020; Poursaeid et al., 2020).

Section 3
Alternative Source Demonstration

The 16th semi-annual detection monitoring event was conducted on February 28, 2025, per 30 TAC Chapter 352. Statistical evaluation of the results (comparison of downgradient monitoring results to 95 percent confidence/95 percent coverage upper tolerance limits [UTLs]) was performed within 60 days of sample collection to identify apparent SSIs above background pursuant to 30 TAC 352 Subpart H. Seven apparent SSIs were initially identified.

As part of the ASD activities, verification sampling was conducted on April 30, 2025, for the initial seven apparent SSIs. Seven apparent SSIs were confirmed for boron, calcium, sulfate, and TDS for three downgradient monitoring wells (MW-37, MW-38R, and MW-61R). Based on the results of the sampling event and statistical analysis, NRG notified the TCEQ of its intent to prepare an ASD addressing the apparent SSIs for boron, calcium, sulfate, and TDS.

The UTLs and sampling results for the seven apparent SSIs are provided in Table 1 below.

Table 4-1
February 2025 Semi-Annual Detection Monitoring Event

ANALYTE	WELL	LTL	UTL	SAMPLE DATE	VALUE	UNIT
DOWNGRADIENT MONITORING WELLS						
Boron	MW-37	N/A	0.116	02/28/2025	0.508	mg/L
Calcium	MW-37	N/A	291.2	02/28/2025	315	mg/L
Sulfate	MW-37	N/A	474	02/28/2025	1,440	mg/L
Boron	MW-38R	N/A	0.116	02/28/2025	0.372	mg/L
Sulfate	MW-38R	N/A	474	02/28/2025	777	mg/L
Sulfate	MW-61R	N/A	474	04/30/2025	626	mg/L
TDS	MW-61R	N/A	1,826	04/30/2025	1,900	mg/L

mg/L= milligrams per liter N/A = Not Applicable
LTL – Lower Tolerance Limit UTL – Upper Tolerance Limit

As discussed previously in subsection 1.1.1 of this ASD, during retrofit construction activities at the APH Pond during 2020 and 2021 per the federal CCR Rule, it appears that the geochemistry and hydrogeology of the uppermost aquifer were altered as follows:

- As a result of removal of water from the APH Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;

- Excavation of all CCR and decontamination of the APH Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
- Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
- As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and ORP, are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.

As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.

In addition, based on site-specific hydrogeology at the E Pond, the following lines of reasoning have been identified that support alternative source(s) for the apparent SSIs:

- The bottom of the E Pond is separated from the upper aquifer system by a confining unit (Stratum PA-1) that hydraulically isolates the bottom of the E Pond from the upper aquifer system (Stratum PA-2). Available data indicate the upper aquifer system is under confined conditions and the confining unit (Stratum PA-1) acts as a vertical hydraulic barrier between the bottom of the E Pond and the upper aquifer system (Stratum PA-2), based on the following lines of reasoning:
    - Based on review of the boring logs for the groundwater monitoring wells installed at the E Pond, the upper clay confining unit (Stratum PA-1) was present at each monitoring well from the ground surface to depths ranging from 19 feet bgs to 32 feet bgs [i.e., thickness ranging from 19 feet to 32 feet; corresponding to elevations of about 53 to 49 feet above mean sea level (amsl)]. The bottom of the E Pond is located within Stratum PA-1 with the bottom of the clay liner at an elevation of about 60 feet amsl); therefore, Stratum PA-1 acts as a confining layer between the bottom of the E Pond and the underlying upper aquifer system (Stratum PA-2); and
    - Based on geotechnical laboratory results for a soil sample collected from Stratum PA-1 at a depth of 10 feet bgs, Stratum PA-1 is a lean clay with a hydraulic conductivity of 2.03E-8 centimeters per second (ERM 2017b), which is consistent with an impervious lithologic unit that exceeds the required specifications per 40 CFR §257.71(a) for a compacted bottom clay liner for a CCR impoundment.
- The E Pond is located at an active power generating area at the Plant Area and non CCR-related and CCR-related materials are actively managed near the E Pond. For example, the FGD loadout pad immediately adjoins the E Pond. The presence of non CCR-related and CCR-related materials near the E pond monitoring wells may be a potential source for some or all of the apparent SSIs identified in groundwater samples collected from wells located downgradient of the E Pond, as described further below. The E Pond monitoring wells were originally installed as flush-mounted wells, which may have enabled surface materials to incidentally enter the groundwater monitoring wells during sampling activities.

- Prior to the third semiannual detection monitoring event, NRG modified the monitoring wells by installing casing extensions and protective casings to protect the wells from the accidental introduction of CCR materials directly into groundwater samples during sample collection. The wells were further redeveloped prior to the fourth sampling event. Although the wells have been improved and sampling collection methods modified, groundwater/groundwater samples may still be affected by the prior, historical inadvertent introduction of surface CCR into the monitoring wells and/or groundwater samples during sample collection. This may include residual impacts from CCR introduced into the wells prior to their improvement in 2018.

Finally, as discussed previously in subsection 2.2 of this ASD, on November 7, 2024 during installation of monitor well MW-61R at the E-Pond to replace MW-61 as part of the construction of a ZLD wastewater treatment facility, soil samples of native subsurface soils were collected and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron, calcium, and sulfate, which are the apparent SSIs for this 16th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4' bgs	27-27'bgs
Boron	3.39 mg/kg	7.35 mg/Kg
Calcium	3,260 mg/kg	41,600 mg/kg
Sulfate	57.3 mg/Kg	83.0 mg/Kg

Based on the consistency of the subsurface soils at the APH Pond and the E-Pond, and the close proximity of the APH Pond to the E-Pond, the subsurface soil laboratory analytical results for the E-Pond are considered to be representative for both CCR Units. As shown in the above table, the concentrations of boron, calcium, and sulfate in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Section 4
Conclusions

Based on statistical evaluation of February 28, 2025, semi-annual detection monitoring event and April 30, 2025, verification sampling events analytical results, boron, calcium, sulfate, and TDS were identified as apparent SSIs for three downgradient monitoring wells (MW-37, MW-38R, and MW-61R) for the 16th semi-annual detection monitoring event. This ASD has identified the following lines of reasoning that support alternative sources for these apparent SSIs:

- The bottom of the E Pond clay liner is separated from the upper aquifer system by a confining unit that hydraulically isolates the bottom of the E Pond from the upper aquifer system. Improperly installed or damaged monitoring wells may have historically provided a conduit for CCR constituents to migrate into the upper aquifer system.
- The former, historical presence of CCR materials in the vicinity of the monitoring wells prior to their modification to include risers from the ground surface provided an opportunity for surface materials to inadvertently enter the wells directly from the ground surface.
- Water quality improved incrementally with each improvement to the CCR groundwater monitoring network over time. In July 2019, MW-38 was severely damaged by mobile plant equipment. MW-38 was abandoned and MW-38R was installed adjacent to the former location of MW-38. Analytical date for August 2019 for MW-38R indicates significantly improved overall groundwater quality data.
- It appears that the construction activities that occurred during the retrofit of the E Pond per the federal CCR Rule and the Closure Plan during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer as follows:
  - As a result of removal of water from the E Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
  - Excavation of all CCR and decontamination of the E Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
  - Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
  - As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.
- As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.

- Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition; and
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Therefore, based on the lines of reasoning presented in this ASD, alternative sources other than a release from the E Pond have been shown to be responsible for each of the seven apparent SSIs observed. Based on this successful ASD, NRG will continue performing semi-annual detection monitoring for the E Pond per 30 TAC Chapter 352.

Section 5
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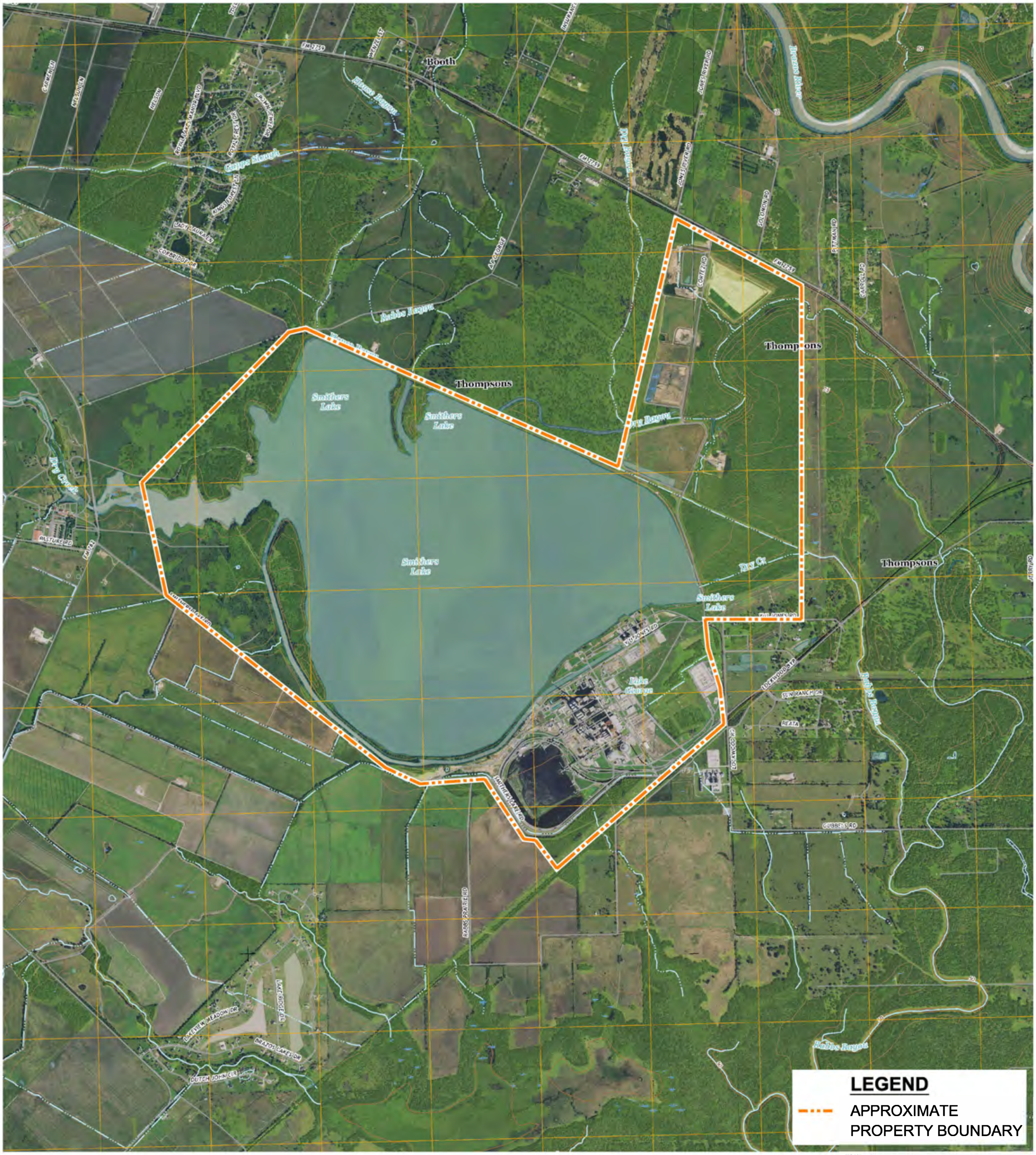
Figures



REFERENCE: U.S.G.S. 7.5 MINUTE TOPOGRAPHIC QUADRANGLES
MISSOURI CITY, TEXAS (2016) / SMITHERS LAKE, TEXAS (2016) / SUGAR LAND, TEXAS (2016) / THOMPSONS, TEXAS (2016)

TEXAS
QUADRANGLE LOCATION

N

0 2,000' 4,000' 8,000'

SCALE IN FEET
1" = 4,000'-0"

CLIENT / PROJECT

NRG TEXAS POWER, LLC
W.A. Parish Station
Thompsons, Texas

TITLE

SITE LOCATION MAP

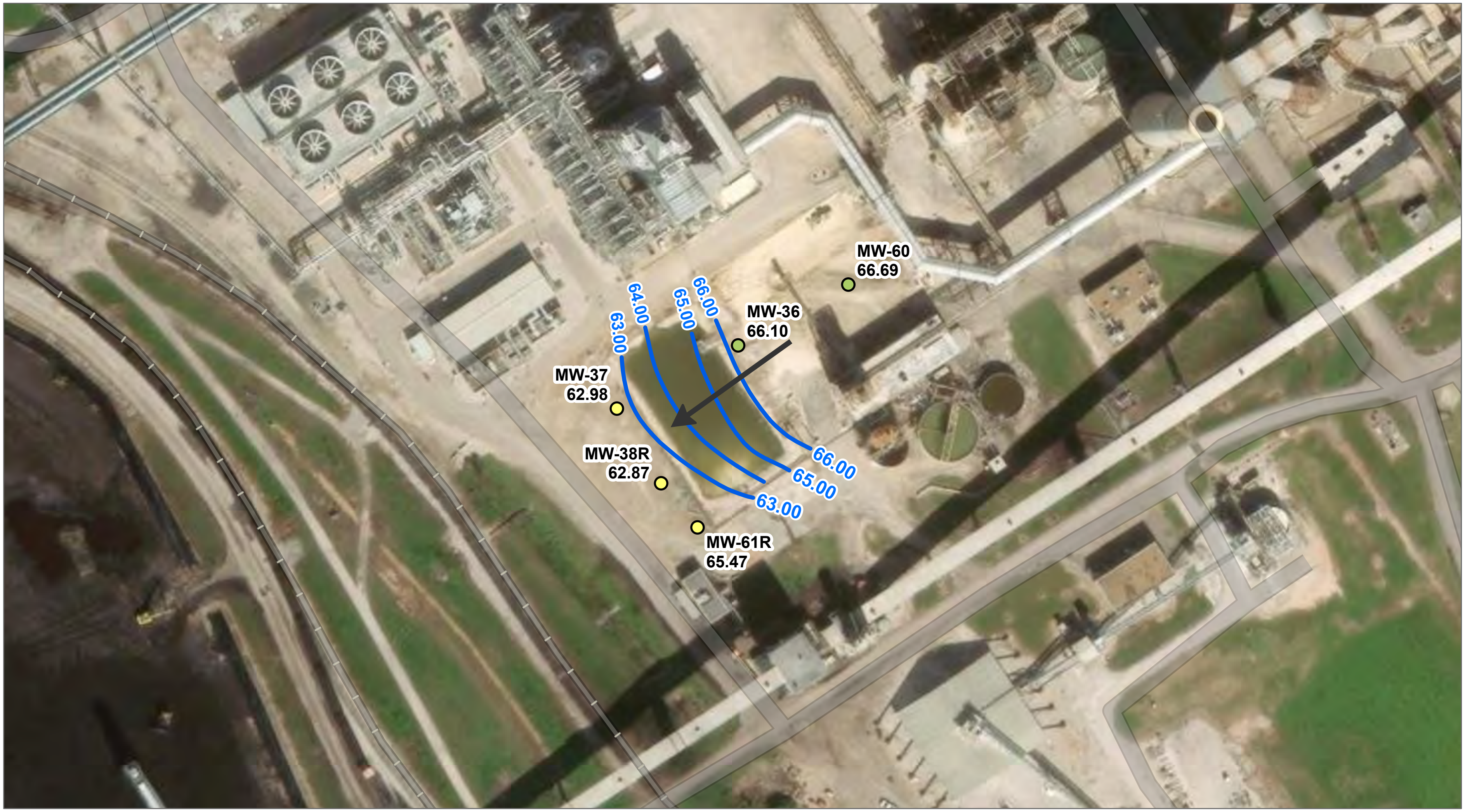
DRAWN BY: **O. Fonseka**	REQUEST BY: **J. Atwell**	PROJECT NO. **649506**
DWG. DATE: **January 2025**	PROJECT-MGR: **T. Dworaczyk**	

TRC
11767 KATY FREEWAY, SUITE 850
HOUSTON, TEXAS 77079
PHONE: 281-616-0100
TRCcompanies.com

FIGURE
1

LAST EDIT: 01/22/2025 - FILE LOCATION: HOU C:\OF-TRC\DRAFTING-CDrive\ECR-Files\NRG\W.A. Parish Station - Thompsons-TX\2025\ Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg

DRAWING By: Oskar Fonseka - FILE NAME: Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg



- MULTIUNIT UPGRADIENT MONITOR WELL
- MULTIUNIT DOWNGRADIENT MONITOR WELL
- GROUNDWATER FLOW DIRECTION
- GROUNDWATER ELEVATION CONTOUR (FT MSL)

STATE OF TEXAS
ANTHONY DWORACZYK
GEOLOGY
2658
LICENSED
PROFESSIONAL GEOSCIENTIST

AD
7/28/2025

BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

NOTE: MW-61R WAS NOT USED FOR GROUNDWATER ELEVATION CONTOUR.

N

0 75 150 FEET

1:1,800 1" = 150'

PROJECT:	NRG TEXAS POWER, LLC W.A. PARISH STATION THOMPSONS, TEXAS
TITLE:	FGD EMERGENCY POND GROUNDWATER MONITORING NETWORK
DRAWN BY:	M. BILLINGS
CHECKED BY:	S. MOTURI
APPROVED BY:	J. ATWELL
DATE:	JULY 2025
PROJ. NO.:	649506
	FIGURE 2

TRC

11767 KATY FREEWAY
SUITE 850
HOUSTON, TX 77079
PHONE: 713.244.1000

FILE: PARISHSTATION_TX_FIGURES

COORDINATE SYSTEM: NAD 1983 2011 STATEPLANE TEXAS SOUTH CENTRAL FIPS 4204 FTUS; MAP ROTATION: 0
-- SAVED BY: MBILLINGS ON 7/23/2025, 10:47:41 AM; FILE PATH: T:\1-PROJECTS\NRG\649506_WA_PARISHSTATION_TEXAS\2-APRX\PARISHSTATION_TX_FIGURES.APRX; LAYOUT NAME: FIG2-6_FGD_EMERGENCYPOND_8.5X11L

Appendix A

10450 Stancliff Rd. Suite 210
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T: +1 281 530 5656
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November 14, 2024

Jessica Atwell
TRC
14701 St. Mary's Lane
Suite 500
Houston, TX 77079

Work Order: **HS24110381**

Laboratory Results for: **NRG Parish Well Install**

Dear Jessica Atwell,

ALS Environmental received 2 sample(s) on Nov 07, 2024 for the analysis presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Generated By: JUMOKE.LAWAL

Andy C. Neir

Client: TRC
Project: NRG Parish Well Install
Work Order: HS24110381

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS24110381-01	MW-61R 3'-4'	Solid		07-Nov-2024 12:45	07-Nov-2024 16:35	☐
HS24110381-02	MW-61R 26-27'	Solid		07-Nov-2024 12:50	07-Nov-2024 16:35	☐

Client: TRC
Project: NRG Parish Well Install
Work Order: HS24110381

CASE NARRATIVE

Metals by Method SW6020A

Batch ID: 220344

Sample ID: HS24110062-01MS

- MS and MSD are for an unrelated sample

Metals by Method SW7471B

Batch ID: 220285

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

Wet Chemistry by Method SW9056

Batch ID: 220398

Sample ID: HS24110357-20MS

- MS and MSD are for an unrelated sample

WetChemistry by Method SW9045D

Batch ID: R499760

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

WetChemistry by Method ASTM D2216

Batch ID: R499652

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG Parish Well Install		WorkOrder:HS24110381
Sample ID:	MW-61R 3'-4'		Lab ID:HS24110381-01
Collection Date:	07-Nov-2024 12:45		Matrix:Solid

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
METALS BY SW6020A		Method:SW6020A			Prep:SW3050B / 11-Nov-2024		Analyst: MSC
Antimony	U		0.0603	0.464	mg/Kg	1	12-Nov-2024 20:30
Arsenic	**1.36**		**0.0650**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Barium	**105**		**0.0278**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Beryllium	**0.656**		**0.0195**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Boron	**3.39**		**0.715**	**2.32**	**mg/Kg**	1	12-Nov-2024 20:30
Cadmium	U		0.0251	0.464	mg/Kg	1	12-Nov-2024 20:30
Calcium	**3,260**		**4.60**	**46.4**	**mg/Kg**	1	12-Nov-2024 20:30
Chromium	**9.36**		**0.0213**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Cobalt	**2.99**		**0.0139**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Lead	**9.50**		**0.0121**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Lithium	**5.51**		**0.0557**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Molybdenum	**0.131**	J	**0.0167**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Selenium	**0.649**		**0.0844**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Thallium	U		0.207	0.464	mg/Kg	1	13-Nov-2024 11:59
MERCURY BY SW7471B		Method:SW7471B			Prep:SW7471B / 08-Nov-2024		Analyst: DH
Mercury	**11.4**		**0.496**	**3.51**	**ug/Kg**	1	11-Nov-2024 15:28
MOISTURE - ASTM D2216		Method:ASTM D2216					Analyst: DFF
Percent Moisture	**13.9**		**0.0100**	**0.0100**	**wt%**	1	11-Nov-2024 14:27
PH SOIL BY SW9045D		Method:SW9045D					Analyst: CD
pH	**8.86**		**0.100**	**0.100**	**pH Units**	1	12-Nov-2024 16:00
Temp Deg C @pH	**20.4**		**0**	**0**	**°C**	1	12-Nov-2024 16:00
ANIONS BY SW9056A		Method:SW9056			Prep:SW9056 / 12-Nov-2024		Analyst: HB
Chloride	**15.5**		**2.00**	**5.00**	**mg/Kg**	1	13-Nov-2024 12:21
Fluoride	**5.49**		**0.300**	**1.00**	**mg/Kg**	1	13-Nov-2024 12:21
Sulfate	**57.3**		**2.00**	**5.00**	**mg/Kg**	1	13-Nov-2024 12:21

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG Parish Well Install		WorkOrder:HS24110381
Sample ID:	MW-61R 26-27'		Lab ID:HS24110381-02
Collection Date:	07-Nov-2024 12:50		Matrix:Solid

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
METALS BY SW6020A			Method:SW6020A		Prep:SW3050B / 11-Nov-2024		Analyst: MSC
Antimony	0.161	J	0.0618	0.476	mg/Kg	1	12-Nov-2024 20:33
Arsenic	7.81		0.0666	0.476	mg/Kg	1	12-Nov-2024 20:33
Barium	52.1		0.0285	0.476	mg/Kg	1	12-Nov-2024 20:33
Beryllium	1.09		0.0200	0.476	mg/Kg	1	12-Nov-2024 20:33
Boron	7.35		0.733	2.38	mg/Kg	1	12-Nov-2024 20:33
Cadmium	0.0441	J	0.0257	0.476	mg/Kg	1	12-Nov-2024 20:33
Calcium	41,600		472	4760	mg/Kg	100	13-Nov-2024 12:31
Chromium	22.7		0.0219	0.476	mg/Kg	1	12-Nov-2024 20:33
Cobalt	10.7		0.0143	0.476	mg/Kg	1	12-Nov-2024 20:33
Lead	12.1		0.0124	0.476	mg/Kg	1	12-Nov-2024 20:33
Lithium	16.8		0.0571	0.476	mg/Kg	1	12-Nov-2024 20:33
Molybdenum	0.507		0.0171	0.476	mg/Kg	1	12-Nov-2024 20:33
Selenium	0.628		0.0866	0.476	mg/Kg	1	12-Nov-2024 20:33
Thallium	U		0.212	0.476	mg/Kg	1	13-Nov-2024 11:52
MERCURY BY SW7471B			Method:SW7471B		Prep:SW7471B / 08-Nov-2024		Analyst: DH
Mercury	5.92		0.497	3.51	ug/Kg	1	11-Nov-2024 15:33
MOISTURE - ASTM D2216			Method:ASTM D2216				Analyst: DFF
Percent Moisture	19.7		0.0100	0.0100	wt%	1	11-Nov-2024 14:27
PH SOIL BY SW9045D			Method:SW9045D				Analyst: CD
pH	8.95		0.100	0.100	pH Units	1	12-Nov-2024 16:00
Temp Deg C @pH	20.2		0	0	°C	1	12-Nov-2024 16:00
ANIONS BY SW9056A			Method:SW9056		Prep:SW9056 / 12-Nov-2024		Analyst: HB
Chloride	44.9		1.99	4.97	mg/Kg	1	14-Nov-2024 03:50
Fluoride	2.32		0.298	0.994	mg/Kg	1	14-Nov-2024 03:50
Sulfate	83.0		1.99	4.97	mg/Kg	1	14-Nov-2024 03:50

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Weight / Prep Log

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

Batch ID: 220285 **Start Date:** 08 Nov 2024 10:17 **End Date:** 08 Nov 2024 10:17
Method: MERCURY PREP - SOLID - 7471B **Prep Code:** HG_S_LOWPR

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS24110381-01		0.5688 (grams)	40 (mL)	70.32	4-oz glass, Neat
HS24110381-02		0.5678 (grams)	40 (mL)	70.45	4-oz glass, Neat

Batch ID: 220344 **Start Date:** 11 Nov 2024 08:00 **End Date:** 11 Nov 2024 08:00
Method: METALS PREP - SOLIDS - SW3050B **Prep Code:** 3050_I_LOW

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS24110381-01		0.5388 (g)	50 (mL)	92.8	4-oz glass, Neat
HS24110381-02		0.5255 (g)	50 (mL)	95.15	4-oz glass, Neat

Batch ID: 220398 **Start Date:** 12 Nov 2024 07:55 **End Date:** 12 Nov 2024 07:55
Method: 9056 ANIONS SOIL PREP **Prep Code:** 9056_S_PR

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS24110381-01		5.0009 (g)	50 (mL)	9.998	4-oz glass, Neat
HS24110381-02		5.0321 (g)	50 (mL)	9.936	4-oz glass, Neat

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: 220285 (0)	**Test Name :** MERCURY BY SW7471B				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		08 Nov 2024 10:17	11 Nov 2024 15:28	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		08 Nov 2024 10:17	11 Nov 2024 15:33	1
Batch ID: 220344 (0)	**Test Name :** METALS BY SW6020A				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		11 Nov 2024 08:00	13 Nov 2024 11:59	1
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		11 Nov 2024 08:00	12 Nov 2024 20:30	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		11 Nov 2024 08:00	13 Nov 2024 12:31	100
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		11 Nov 2024 08:00	13 Nov 2024 11:52	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		11 Nov 2024 08:00	12 Nov 2024 20:33	1
Batch ID: 220398 (0)	**Test Name :** ANIONS BY SW9056A				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		12 Nov 2024 07:55	13 Nov 2024 12:21	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		12 Nov 2024 07:55	14 Nov 2024 03:50	1
Batch ID: R499652 (0)	**Test Name :** MOISTURE - ASTM D2216				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45			11 Nov 2024 14:27	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50			11 Nov 2024 14:27	1
Batch ID: R499760 (0)	**Test Name :** PH SOIL BY SW9045D				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45			12 Nov 2024 16:00	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50			12 Nov 2024 16:00	1

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220285 (0) **Instrument:** HG04 **Method:** MERCURY BY SW7471B

MBLK Sample ID: **MBLK-220285** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:52**
Client ID: Run ID: **HG04_499583** SeqNo: **8507469** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	1.067	3.32								J

LCS Sample ID: **LCS-220285** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:54**
Client ID: Run ID: **HG04_499583** SeqNo: **8507470** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	337.3	3.32	333.3	0	101	85 - 115				

MS Sample ID: **HS24110339-01MS** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:57**
Client ID: Run ID: **HG04_499583** SeqNo: **8507472** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	397.9	3.48	348.4	37.79	103	85 - 115				

MSD Sample ID: **HS24110339-01MSD** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:59**
Client ID: Run ID: **HG04_499583** SeqNo: **8507473** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	396.8	3.50	350.5	37.79	102	85 - 115	397.9	0.285	20	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

MBLK Sample ID: **MBLK-220344** Units: **mg/Kg** Analysis Date: **12-Nov-2024 19:58**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518799** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	U	0.497								
Arsenic	U	0.497								
Barium	U	0.497								
Beryllium	U	0.497								
Boron	U	2.49								
Cadmium	U	0.497								
Calcium	U	49.7								
Chromium	U	0.497								
Cobalt	U	0.497								
Lead	U	0.497								
Lithium	U	0.497								
Molybdenum	U	0.497								
Selenium	U	0.497								
Thallium	U	0.497								

LCS Sample ID: **LCS-220344** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:00**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518800** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	9.149	0.497	9.932	0	92.1	80 - 120				
Arsenic	9.451	0.497	9.932	0	95.1	80 - 120				
Barium	9.335	0.497	9.932	0	94.0	80 - 120				
Beryllium	9.673	0.497	9.932	0	97.4	80 - 120				
Boron	47.36	2.48	49.66	0	95.4	80 - 120				
Cadmium	9.274	0.497	9.932	0	93.4	80 - 120				
Calcium	927.6	49.7	993.2	0	93.4	80 - 120				
Chromium	9.272	0.497	9.932	0	93.4	80 - 120				
Cobalt	9.372	0.497	9.932	0	94.4	80 - 120				
Lead	9.424	0.497	9.932	0	94.9	80 - 120				
Lithium	9.329	0.497	9.932	0	93.9	80 - 120				
Molybdenum	9.035	0.497	9.932	0	91.0	80 - 120				
Selenium	9.439	0.497	9.932	0	95.0	80 - 120				
Thallium	8.893	0.497	9.932	0	89.5	80 - 120				

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

MS Sample ID: **HS24110062-01MS** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:15**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518830** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	6.629	0.474	9.471	0.7615	61.9	75 - 125				S
Arsenic	29.15	0.474	9.471	18.57	112	75 - 125				
Barium	152.6	0.474	9.471	149.3	34.5	75 - 125				SO
Beryllium	10.73	0.474	9.471	1.227	100	75 - 125				
Boron	45.07	2.37	47.36	6.499	81.5	75 - 125				
Cadmium	9.454	0.474	9.471	0.4038	95.5	75 - 125				
Calcium	14700	47.4	947.1	14780	-8.68	75 - 125				SO
Chromium	38.89	0.474	9.471	25.29	144	75 - 125				S
Cobalt	16.53	0.474	9.471	6.896	102	75 - 125				
Lead	123.3	0.474	9.471	96	288	75 - 125				SO
Lithium	20.74	0.474	9.471	10.31	110	75 - 125				E
Molybdenum	9.214	0.474	9.471	0.9538	87.2	75 - 125				
Selenium	10.35	0.474	9.471	1.466	93.8	75 - 125				

MS Sample ID: **HS24110062-01MS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:44**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520246** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Thallium	7.282	0.474	9.471	0.2701	74.0	75 - 125				S

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

MSD Sample ID: **HS24110062-01MSD** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:18**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518831** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	4.836	0.469	9.376	0.7615	43.5	75 - 125	6.629	31.3	20	SR
Arsenic	26.2	0.469	9.376	18.57	81.4	75 - 125	29.15	10.6	20	
Barium	101.1	0.469	9.376	149.3	-514	75 - 125	152.6	40.5	20	SRO
Beryllium	9.769	0.469	9.376	1.227	91.1	75 - 125	10.73	9.42	20	
Boron	51.59	2.34	46.88	6.499	96.2	75 - 125	45.07	13.5	20	
Cadmium	9.036	0.469	9.376	0.4038	92.1	75 - 125	9.454	4.52	20	
Calcium	18320	46.9	937.6	14780	377	75 - 125	14700	21.9	20	SREO
Chromium	38.06	0.469	9.376	25.29	136	75 - 125	38.89	2.15	20	S
Cobalt	16.54	0.469	9.376	6.896	103	75 - 125	16.53	0.0872	20	
Lead	104.4	0.469	9.376	96	89.7	75 - 125	123.3	16.6	20	O
Lithium	18.63	0.469	9.376	10.31	88.7	75 - 125	20.74	10.7	20	
Molybdenum	8.434	0.469	9.376	0.9538	79.8	75 - 125	9.214	8.84	20	
Selenium	10.03	0.469	9.376	1.466	91.3	75 - 125	10.35	3.16	20	

MSD Sample ID: **HS24110062-01MSD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:47**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520247** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Thallium	7.099	0.469	9.376	0.2701	72.8	75 - 125	7.282	2.55	20	S

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

PDS Sample ID: **HS24110062-01PDS** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:20**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518832** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	9.917	0.481	9.628	0.7615	95.1	75 - 125				
Arsenic	27.95	0.481	9.628	18.57	97.3	75 - 125				
Barium	159.8	0.481	9.628	149.3	109	75 - 125				O
Beryllium	10.89	0.481	9.628	1.227	100	75 - 125				
Boron	56.88	2.41	48.14	6.499	105	75 - 125				
Cadmium	9.685	0.481	9.628	0.4038	96.4	75 - 125				
Calcium	15660	48.1	962.8	14780	91.2	75 - 125				O
Chromium	34.91	0.481	9.628	25.29	100.0	75 - 125				
Cobalt	16.55	0.481	9.628	6.896	100	75 - 125				
Lead	104.5	0.481	9.628	96	88.2	75 - 125				O
Molybdenum	10.09	0.481	9.628	0.9538	94.9	75 - 125				
Selenium	11.1	0.481	9.628	1.466	100	75 - 125				

PDS Sample ID: **HS24110062-01PDS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:54**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520250** PrepDate: **11-Nov-2024** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Lithium	56.08	2.41	48.14	10.12	95.5	75 - 125				

PDS Sample ID: **HS24110062-01PDS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:49**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520248** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Thallium	9.363	0.481	9.628	0.2701	94.4	75 - 125				

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

SD Sample ID: **HS24110062-01SD** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:13**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518829** PrepDate: **11-Nov-2024** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Antimony	0.8346	2.41					0.7615	0	10	J
Arsenic	19.53	2.41					18.57	5.15	10	
Barium	155.3	2.41					149.3	4.03	10	
Beryllium	1.251	2.41					1.227	0	10	J
Boron	8.563	12.0					6.499	0	10	J
Cadmium	0.4212	2.41					0.4038	0	10	J
Calcium	14990	241					14780	1.41	10	
Chromium	25.62	2.41					25.29	1.3	10	
Cobalt	7.369	2.41					6.896	6.87	10	
Lead	99.46	2.41					96	3.6	10	
Molybdenum	0.9704	2.41					0.9538	0	10	J
Selenium	1.638	2.41					1.466	0	10	J

SD Sample ID: **HS24110062-01SD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:57**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520251** PrepDate: **11-Nov-2024** DF: **25**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Lithium	10.99	12.0					10.12	0	10	J

SD Sample ID: **HS24110062-01SD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:42**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520245** PrepDate: **11-Nov-2024** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Thallium	U	2.41					0.2701	0	10	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220398 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY SW9056A

MBLK Sample ID: **MBLK-220398** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:41**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521384** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	U	5.00								
Fluoride	U	1.00								
Sulfate	2.013	5.00								J

LCS Sample ID: **LCS-220398** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:49**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521385** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	200.7	5.00	200	0	100	80 - 120				
Fluoride	42.08	1.00	40	0	105	80 - 120				
Sulfate	208.3	5.00	200	0	104	80 - 120				

MS Sample ID: **HS24110357-20MS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 12:05**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521387** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	994.2	4.97	99.45	908.7	86.0	80 - 120				O
Fluoride	35.61	0.995	19.89	10.87	124	80 - 120				S
Sulfate	122.1	4.97	99.45	6.445	116	80 - 120				

MSD Sample ID: **HS24110357-20MSD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 12:13**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521388** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	996.9	4.97	99.35	908.7	88.7	80 - 120	994.2	0.265	20	EO
Fluoride	35.79	0.993	19.87	10.87	125	80 - 120	35.61	0.484	20	S
Sulfate	121.8	4.97	99.35	6.445	116	80 - 120	122.1	0.261	20	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: R499652 (0) **Instrument:** Balance1 **Method:** MOISTURE - ASTM D2216

DUP Sample ID: **HS24110389-04DUP** Units: **wt%** Analysis Date: **11-Nov-2024 14:27**
Client ID: Run ID: **Balance1_499652** SeqNo: **8509159** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Percent Moisture	14.7	0.0100					14.5	1.37	20	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: **R499760 (0)** **Instrument:** **WetChem_HS** **Method:** **PH SOIL BY SW9045D**

DUP Sample ID: **HS24110381-01DUP** Units: **pH Units** Analysis Date: **12-Nov-2024 16:00**

Client ID: **MW-61R 3'-4'** Run ID: **WetChem_HS_499760** SeqNo: **8519095** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
pH	8.89	0.100					8.86	0.338	10	
Temp Deg C @pH	20.4	0					20.4	0	10	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: **HS24110381**

QUALIFIERS, ACRONYMS, UNITS

Qualifier	Description
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte detected below quantitation limit
M	Manually integrated, see raw data for justification
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL/SDL

Acronym	Description
DCS	Detectability Check Study
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitaion Limit
SD	Serial Dilution
SDL	Sample Detection Limit
TRRP	Texas Risk Reduction Program

CERTIFICATIONS,ACCREDITATIONS & LICENSES

Agency	Number	Expire Date
Arizona	AZ0793	27-May-2025
Arkansas	88-00356_2024	27-Mar-2025
California	2919; 2025	30-Apr-2025
Dept of Defense	L24-240	30-Apr-2026
Dept of Defense	L24-239	30-Apr-2026
Florida	E87611-38	30-Jun-2025
Illinois	2000322023-11	31-Jul-2025
Kansas	E-10352 2023-2024	31-Jul-2025
Kentucky	123043	30-Apr-2025
Louisiana	03087 2023-2024	30-Jun-2025
Maine	2024017	23-Jun-2026
Michigan	9971	30-Apr-2025
Nebraska	NE-OS-25-13	30-Apr-2025
New Jersey	TX008	30-Jun-2025
North Carolina	624 - 2024	31-Dec-2024
Pennsylvania	018	30-Jun-2025
Tennessee	04016	30-Apr-2025
Texas	T104704231 TX-C24-00130	30-Apr-2025
Utah	TX026932023-14	31-Jul-2025

Sample Receipt Checklist

Work Order ID: HS24110381 **Date/Time Received:** **07-Nov-2024 16:35**

Client Name: TRC-HOU **Received by:** **Travis Appling**

Completed By: *| /S/ Travis Appling*	07-Nov-2024 17:46	**Reviewed by:** *| /S/ Alexis Dorenbosch*	08-Nov-2024 10:53

	eSignature	Date/Time	eSignature	Date/Time
Completed By:	*/S/ Travis Appling*	07-Nov-2024 17:46		
Reviewed by:			*/S/ Alexis Dorenbosch*	08-Nov-2024 10:53

Matrices: **S** Carrier name: **Client**

	Yes	No	
Shipping container/cooler in good condition?	☑	☐	Not Present ☐
Custody seals intact on shipping container/cooler?	☐	☐	Not Present ☑
Custody seals intact on sample bottles?	☐	☐	Not Present ☑
VOA/TX1005/TX1006 Solids in hermetically sealed vials?	☐	☐	Not Present ☑
Chain of custody present?	☑	☐	1 Page(s)
Chain of custody signed when relinquished and received?	☑	☐	COC IDs:329698
Samplers name present on COC?	☑	☐	
Chain of custody agrees with sample labels?	☑	☐	
Samples in proper container/bottle?	☑	☐	
Sample containers intact?	☑	☐	
Sufficient sample volume for indicated test?	☑	☐	
All samples received within holding time?	☑	☐	
Container/Temp Blank temperature in compliance?	☑	☐	

Temperature(s)/Thermometer(s):	0.8UC/ 0.8C	IR36
Cooler(s)/Kit(s):	50741	
Date/Time sample(s) sent to storage:	11/7/2024 17:46	

	Yes	No	
Water - VOA vials have zero headspace?	☐	☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	☐	☐	N/A ☑
pH adjusted?	☐	☐	N/A ☑

pH adjusted by:

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

Corrective Action:

ALS

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Everett, WA +1 425 356 2600 · Holland, MI +1 616 399 6070

Chain of Custody Form

Page 1 of 1

COC ID: 329698

TRC
NRG Parish Well Install

ALS Project Manager:

Customer Information		Project Information			
Purchase Order	[illegible]	Project Name	[illegible]	A	[illegible]
Work Order		Project Number		B	[illegible]
Company Name	[illegible]	Bill To Company	[illegible]	C	[illegible]
Send Report To	[illegible]	Invoice Attn	[illegible]	D	[illegible]
Address	[illegible]	Address	[illegible]	E	[illegible]
				F	
City/State/Zip	[illegible]	City/State/Zip	[illegible]	G	
Phone	[illegible]	Phone	[illegible]	H	
Fax	[illegible]	Fax	[illegible]	I	
e-Mail Address	[illegible]	e-Mail Address	[illegible]	J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	MW-6IR 3'-4'	11/07/24	1245	S	—	1	X	X	X	X	X						
2	MW-6IR 26-27'	11/07/24	1250	S	—	1	X	X	X	X	X						
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign: Candida Conde [signature]

Shipment Method:

Required Turnaround Time: (Check Box)

Results Due Date:

Relinquished by: [signature]	Date: 11/07/24	Time: 1635	Received by:
Relinquished by:	Date: 11/7/24	Time: 1635	Received by (Laboratory): [signature]
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory):

Notes: [illegible]

Cooler ID	Cooler Temp.
	cF o°
50141	0.8
	IR36

QC Package: (Check One Box Below)

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited to the terms and conditions stated on the reverse.
3. The Chain of Custody is a legal document. All information must be completed accurately.

Appendix B

BORING LOG and WELL CONSTRUCTION

MW-61R

Client: NRG	TRC Project #: 634611
Site: WA Parish	Start Date: 11.7.2024 - 1120
Address: 2500 YU Jones Rd., Richmond, TX 77469	Finish Date: 11.8.2024 - 1108
Project: CCR - Well Installation	Permit #: -
Drilling Company: Best Drilling Services Drilling Crew: Bruce, LD, Jesus	TRC Site Rep.: Jessica Atwell
Drilling Method: Hollow Stem Auger (HSA)	TRC Reviewer: Tony Dworaczyk
Boring Diameter (in): 8" Boring Depth (ft bgs): 40'	X-Y Coord. System: GPS
Sampling Method: Split Spoon	Lat: 29.474643
Well Material/Size 40 Schedule PVC - 2"	Long: -95.635769
Field Screening Parameter: (ft) Water Meter	Well Elevation (ft) 74.98'
Well Depth: feet Well Depth (TOC): 43.8	Ground Elevation (ft): 71.18'

Depth (ft)	Sample ID	Water Encountered During Drilling	Lithology	Lithologic Description	Well Description
above 0					Stick up with 3 bollards 0-1' Grout 2x2
0–10	Sampled 3-4'		CL	CL: Trace gravel, dark brown, moist, high plasticity, highly cohesive, hard	
10–23			CL	Silty Clay (CL): Light gray/brown, moist, high plasticity, highly cohesive, hard 20-25' trace gravel	0-25.5' Grout
23–27	Sampled 26-27'		SC	SC: Light gray/brown, moist, semi-cohesive, medium to fine grained, gravel is meadium to coarse grained, soft	25.5-28' Bentonite Seal - 3/8" chips
27–40		Initital	SM	SM: Light to dark orange, saturated, medium to fine grained, soft	28-40' Filter Pack - Sand 20/40 grade 30-40' 0.01" slot screen

STATE OF TEXAS
ANTHONY DWORACZYK
GEOLOGY
2658
LICENSED
PROFESSIONAL GEOSCIENTIST

11/20/24

Texas Commission on Environmental Quality

Waste Permits Division Correspondence Cover Sheet

Date: July 28, 2025
Facility Name: NRG-WA Parish Generating Station
Permit or Registration No.: CCR108

Nature of Correspondence:
☒ Initial/New
☐ Response/Revision to TCEQ Tracking No.: ______ (from subject line of TCEQ letter regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Notifications
☐ New Notice of Intent	☐ Alternative Daily Cover Report
☐ Notice of Intent Revision	☐ Closure Report
☐ New Permit (including Subchapter T)	☐ Compost Report
☐ New Registration (including Subchapter T)	☒ Groundwater Alternate Source Demonstration
☐ Major Amendment	☐ Groundwater Corrective Action
☐ Minor Amendment	☐ Groundwater Monitoring Report
☐ Limited Scope Major Amendment	☐ Groundwater Background Evaluation
☐ Notice Modification	☐ Landfill Gas Corrective Action
☐ Non-Notice Modification	☐ Landfill Gas Monitoring
☐ Transfer/Name Change Modification	☐ Liner Evaluation Report
☐ Temporary Authorization	☐ Soil Boring Plan
☐ Voluntary Revocation	☐ Special Waste Request
☐ Subchapter T Disturbance Non-Enclosed Structure	☐ Other:
☐ Other:	

Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
☐ New	☐ Annual/Biennial Site Activity Report
☐ Renewal	☐ CPT Plan/Result
☐ Post-Closure Order	☐ Closure Certification/Report
☐ Major Amendment	☐ Construction Certification/Report
☐ Minor Amendment	☐ CPT Plan/Result
☐ CCR Registration	☐ Extension Request
☐ CCR Registration Major Amendment	☐ Groundwater Monitoring Report
☐ CCR Registration Minor Amendment	☐ Interim Status Change
☐ Class 3 Modification	☐ Interim Status Closure Plan
☐ Class 2 Modification	☐ Soil Core Monitoring Report
☐ Class 1 ED Modification	☐ Treatability Study
☐ Class 1 Modification	☐ Trial Burn Plan/Result
☐ Endorsement	☐ Unsaturated Zone Monitoring Report
☐ Temporary Authorization	☐ Waste Minimization Report
☐ Voluntary Revocation	☐ Other:
☐ 335.6 Notification	
☐ Other:	

I hereby certify that the alternative source demonstration presented within this document for the NRG WA Parish Coal Ash Disposal Landfill CCR Unit has been prepared to meet the requirements of 30 TAC 352.4; 352.941(c); and 352.1321. This document is accurate and has been prepared in accordance with good geosciences practices, including the consideration of applicable industry standards, and with the requirements of 30 TAC 352.4; 352.941(c); and 352.1321.

Name: Tony Dworaczyk **Expiration Date:** 1/30/2026

Company: TRC Environmental Corporation **Date:** 7/28/2025

STATE OF TEXAS
ANTHONY DWORACZYK
GEOLOGY
2658
LICENSED
PROFESSIONAL GEOSCIENTIST

7/28/2025

Alternative Source Demonstration

W.A. Parish Electric Generating Station
Solid Waste Disposal Area (SWMU 001) CCR Multiunit

July 2025

Prepared For
NRG Texas Power, LLC
Thompsons, Texas
TCEQ Coal Combustion Residuals (CCR) Registration No. CCR108
Industrial Solid Waste Registration No. 31631
EPA Identification No. TXD097311849

STATE OF TEXAS
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7/28/2025

Gregory E. Tieman	Tony Dworaczyk, P.G.
Senior Client Services Manager	Senior Project Manager

TRC Environmental Corporation | NRG Texas Power, LLC
Alternate Source Demonstration, W.A. Parish, Solid Waste Disposal Area (SWMU 001)

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Executive Summary

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas. Units managing coal combustion residuals (CCR) at the Station are subject to the requirements of 30 Texas Administrative Code (TAC) Chapter 352. CCR generated at the Station consists of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge. The Site has three active CCR management units that are subject to regulation under 30 TAC Chapter 32, including the Solid Waste Disposal Area (SWDA) multi-unit landfill (Landfill), which is the subject of this Alternate Source Demonstration (ASD).

The 16th semi-annual groundwater detection monitoring event was conducted on February 28, 2025. Statistical evaluation of the results was performed within 60 days of sample collection to identify apparent statistically significant increases (SSIs) above background pursuant to 30 TAC 352 Subpart H. Seven apparent SSIs were identified. Two of the apparent SSIs were identified in an upgradient background monitoring well MW-23R (calcium and sulfate). NRG notified the Texas Commission on Environmental Quality (TCEQ) of its intent to prepare an ASD.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the second half 2019 (July) through the first half 2021 (April). The February 28, 2025, semi-annual detection monitoring event analytical results, are the seventh data set statistically evaluated using the new background water quality data set.

This ASD successfully identified alternative sources for the apparent SSIs at the SWDA Landfill, based on the following lines of reasoning:

- Natural variations in upgradient background groundwater quality;
- Enhanced minerals dissolution and changes in geochemical conditions within the aquifer; and
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater

Therefore, based on the lines of reasoning presented in this ASD, alternative sources other than a release from the SWDA Landfill have been shown to be responsible for all the apparent SSIs. Based on preparation of this successful ASD, NRG will continue semi-annual detection monitoring for the SWDA Landfill per 30 TAC Chapter 352.

Section 1
Introduction

1.1 Background

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas, adjacent to Smithers Lake. The electricity generating portion of the Station, or the main Plant Operations Area (Plant Area), is located along the southeastern shore of the lake.

Management of coal combustion residuals (CCR) at the Station is performed pursuant to 30 Texas Administrative Code (TAC) Chapter 352, which became effective during June 2021. Prior to this, management of CCR was performed pursuant to the United States Environmental Protection Agency (USEPA) final rule for the regulation and management of CCR under the Resource Conservation and Recovery Act (RCRA) Title 40, Code of Federal Regulations, Part 257 (40 CFR §257) (CCR Rule, effective date October 17, 2015) and the Phase 1, Part1 final rule (July 30, 2018). CCR generated at the Station consist of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge, which have been classified by the TCEQ as Class II nonhazardous waste. The Station has the following three active CCR-management units:

- Solid Waste Disposal Area (SWDA) (SWMU 001), which consists of four active CCR-management cells: Cell 1C, Cell 2A-Pug Mill, Cell 2B, and Cell 3; and is now monitored as a single CCR Multiunit;
- Air Preheater Pond (APH Pond, SWMU 021); and
- FGD Emergency Pond (E Pond, SWMU 020).

The SWDA Landfill is located to the north of the Plant Area and the APH and E Ponds are located at the southern portion of the Plant Area. The locations of the three CCR units are shown on Figure 1. The SWDA Landfill is the subject of this Alternative Source Demonstration (ASD).

CCR-management activities at the SWDA Landfill are generally described as follows:

- Cell 1C – Receives nonmarketable CCR trucked from the plant;
- Cell 2B – Receives marketable CCR trucked from the plant;
- Cell 3 – Receives CCR bottom ash trucked from the plant; and
- Cell 2A-Pug Mill – Pug mill located at a small portion of Cell 2A and that is not currently being used for CCR management purposes.

1.1.1 Groundwater Monitoring Program

On behalf of NRG, Environmental Resources Management, Inc. (ERM) conducted eight independent background groundwater detection monitoring events for both the Appendix III and IV CCR constituents between April 2015 and August 2017 per §257.94(b) of the federal CCR Rule and the first semi-annual detection monitoring event in October 2017. Results of the eight background and first semi-annual detection monitoring events for the APH Pond were documented in the *Annual Groundwater Monitoring and Corrective Action Reports* (January 30, 2018) for the individual CCR landfill units (Cell 1C, Cell 2A, Cell 2B, and Cell 3) and the *CCR Groundwater Monitoring Reports* (March 1, 2018) for the individual CCR landfill units pursuant to §257.90(e).

The Station has continued to conduct semi-annual detection monitoring at the SWDA Landfill per the federal CCR Rule and 30 TAC Chapter 352. As of the February 28, 2025, sampling event, a total of 16 semi-annual detection monitoring events have now been performed. Following each semi-annual detection monitoring sampling event, the results have been evaluated for potential SSIs, and ASDs have been prepared as needed. Since implementation of 30 TAC Chapter 352, the ASDs have been submitted to TCEQ for review and approval. The semi-annual detection monitoring activities and ASDs have been included in the Annual Groundwater Monitoring and Corrective Action reports, which have been placed into the Facility Operating Record (FOR) and posted to NRG's publicly accessible website.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the third half 2019 (July) through the first half 2021 (April). The February 28, 2025, semi-annual detection monitoring event analytical results, are the seventh data set statistically evaluated using the new background water quality data set.

1.2 Purpose

TRC prepared this ASD on behalf of NRG to evaluate apparent SSIs above background levels for the 16th semi-annual detection monitoring event in accordance with 30 TAC Chapter 352.

Section 2
Site Geology and Hydrogeology

This section provides information about the geology and hydrogeology of the Station and the area surrounding the SWDA landfill.

2.1 Hydrogeology

Based on the *Geologic Atlas of Texas, Houston Sheet* (BEG 1982), the Station is underlain by alluvium and the Beaumont formation (also commonly referred to as the Beaumont Clay). The alluvium is present along the Brazos River, which is located approximately 0.9 miles from the northern boundary of the SWDA Landfill. Both the alluvium and the Beaumont formation are composed of clay, silt, and sand; and may include stream channel, point-bar, natural levee, back swamp, coastal marsh, and mud-flat deposits. The thickness of the Beaumont formation is approximately 100 feet. The alluvium is not present at the Plant Area, which is consistent with this area being located outside of the Brazos River floodplain zone (FBC, 2018).

The alluvium and Beaumont Formation are located within the upper unit of the Chicot aquifer system. At most locations throughout Fort Bend County, the Chicot aquifer system is under confined conditions (TWDB 1990). The Chicot aquifer system is primarily recharged by precipitation at locations where it outcrops in Austin, Harris, and Waller Counties; groundwater then flows laterally within Fort Bend County (TWDB 1990). Site investigations performed by others on behalf of NRG also indicate that the uppermost groundwater-bearing units at the Station are under confined conditions (ERM, 2017a).

Environmental site investigations conducted in May 2016 and November 2016 identified three main subsurface strata at the Station, which were designated as Stratum DA-1 through DA-3 at the SWDA Landfill and Stratum PA-1 through PA-3 at the Plant Area (APH Pond and E Pond). The strata are fully described in the October 2017 *CCR Groundwater Monitoring Networks* report (ERM, 2017b) and are summarized below.

2.1.1 Stratum DA-1 (Upper Confining Unit)

Stratum DA-1 is predominately silty clay with some sandy clay, clay, and sandy silt. Stratum DA-1 is generally present from the ground surface to approximately 30 feet below ground surface (bgs), but this stratum ranges in thickness from 20 to 60 feet throughout the SWDA Landfill.

Stratum DA-1 serves as a confining unit to underlying Stratum DA-2, which comprises the uppermost groundwater-bearing unit at the Station. Geotechnical laboratory testing indicates that the hydraulic conductivity of Stratum DA-1 is 2.85E-08 centimeters per second (cm/sec) (ERM 2017b).

2.1.2 Stratum DA-2 (Upper Aquifer System)

Stratum DA-2 consists of interbedded sand, silty sand, clayey sand, and clayey sandy silt with some gravelly sand. The clay content within Stratum DA-2 varies across the SWDA. Stratum DA-2 is generally greater than 10 feet in thickness with bottom depths ranging from 60 to 80 feet bgs.

Stratum DA-2 is saturated and comprises the upper aquifer system at the SWDA Landfill. CCR monitoring wells at the SWDA Landfill are completed within Stratum DA-2. Slug testing results for CCR monitoring wells indicate hydraulic conductivity ranges from 6.86E-04 cm/sec to 2.59E-02 cm/sec in Stratum DA-2 (ERM, 2017b). Groundwater primarily flows to the northeast towards the Brazos River beneath the SWDA Landfill.

2.1.3 Stratum DA-3 (Lower Confining Unit)

Stratum DA-3 is predominantly clay to silty clay. This stratum appears to be the bottom confining layer to the overlying groundwater-bearing unit (Stratum DA-2). The thickness of Stratum DA-3 has not been determined at the SWDA Landfill.

2.1.4 Solid Waste Disposal Area – Certified Monitored Network

Four separate groundwater monitoring well systems were initially developed in 2016 for each of the four active CCR cells within the SWDA Landfill, which were certified by a Texas P.E. under 257.91(f) of the federal CCR Rule on October 17, 2017. The monitoring wells were completed into Stratum DA-2, the upper aquifer system at the Station.

Following successful preparation of the ASD in July 2018 for the first semi-annual detection monitoring event for the SWDA Landfill, the four individual CCR cells were combined into a single CCR multiunit landfill as allowed for in the federal CCR Rule for groundwater monitoring purposes. A revised groundwater monitoring system and revised statistical method were developed and certified by a Texas professional engineer (P.E.) for the SWDA Landfill. The monitoring wells comprising the revised groundwater monitoring system are shown in Table 1.

Table 1 Groundwater Monitoring System for SWDA CCR-Multiunit

UPGRADIENT WELLS	DOWNGRADIENT WELLS
MW-23R, MW-28D, MW-42, MW-43, MW-47, and MW-48	MW-44, MW-46R, MW-50, MW-52, MW-54, MW-55R, MW-58, and MW-65

Because of potential integrity issues with the construction of background monitoring well MW-23 (potential infiltration of grout into the well screen), it was replaced by MW-23R after the seventh quarterly background monitoring event, which occurred in January 2020. MW-23R was installed in close proximity to MW-23. A groundwater potentiometric surface map was prepared by TRC for the February 28, 2025 semi-annual detection monitoring event and is provided in this ASD as Figure 2. Historically, groundwater flows primarily to the northeast beneath the SWDA CCR multiunit at a gradient ranging from 0.0007 foot per foot (ft/ft) to 0.003 ft/ft.

2.2 Site Specific Information

Subsurface data from a soil boring recently installed as part of the current monitoring network at the nearby Emergency Pond (E-Pond) at the Station indicate that the subsurface geology beneath the W.A. Parish generating facility consists predominately of clays, silty clays with sandy clay, sandy silt, and sands and is consistent across the Station (ERM, Groundwater Monitoring networks, October 2017).

During the original installation of monitor wells for the W.A. Parish CCR monitoring networks, soil samples were not collected for Appendix III & IV CCR constituent analyses. In November 2024, monitor well MW-61R was installed at the E-Pond to replace MW-61 as part of the construction of a Zero Liquid Discharge (ZLD) wastewater treatment facility required under the Effluent Limitation Guidelines (ELG) for coal-fired power plants. During the installation of MW-61R, soil samples of native subsurface soils were collected on November 7, 2024, and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron and sulfate, which are the apparent SSIs for this 16th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4’ bgs	27-27’bgs
Calcium	3,260 mg/kg	41,600 mg/Kg
Sulfate	57.3 mg/Kg	83.0 mg/Kg

Based on the consistency of the subsurface soils at the SWDA and the E-Pond, and the close proximity of the SWDA and the E-Pond, the subsurface soil laboratory analytical results for the E-Pond are considered to be representative for both CCR Units. The laboratory analytical report is included as Appendix A of this ASD. As shown in the above table, the concentrations of calcium and sulfate in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

2.3 Groundwater Geochemistry

Understanding the geochemistry of groundwater is essential to examining the groundwater monitoring data, explaining the relationships between the characteristics of the groundwater, and analyzing both natural and potential anthropogenic impacts on groundwater. Separate from potential source areas of contamination, geochemical processes are critical in controlling the chemical composition of groundwater, including carbonate equilibrium, oxidation-reduction reactions, and adsorption-desorption processes. Based on the site geological conditions, several groundwater parameters are discussed as follows, including sulfate and boron.

2.3.1 Calcium in Groundwater

Calcium is one of the most important ionic constituents in groundwater (Razowska-jaworek, 2014). Water-rock interaction occurs when water interacts with minerals in soils or rocks, such as limestone, marble, calcite, dolomite, gypsum, fluorite, and apatite. Natural dissolution of carbonate rocks and minerals is the primary source of calcium in groundwater (Jiang et al., 2009). Calcium is an important determinant of water hardness (Ca^{2+}), while magnesium is the other hardness determinant. The most common shallow groundwater type is Ca-HCO_3 dominated and Ca(Mg)-HCO_3 dominated.

A literature review indicates the major factors that may influence the calcium concentration in groundwater include rock weathering, soil pH, electrical conductivity, and anthropogenic activities (mining, concrete material dissolution, fertilizer etc.) (Hájek et al., 2021; Schot & Wassen, 1993; Shi et al., 2018).

Regarding the concentrations of calcium in groundwater at the SWDA, the source of calcium is more likely natural rather than anthropogenic. Therefore, the increase in concentration of calcium may be related to natural variations in groundwater geochemistry associated with rock weathering, soil pH, and electrical conductivity.

2.3.2 Sulfate in Groundwater

Sulfate is ubiquitous in groundwater, with both natural and anthropogenic sources. Apart from a potential sulfate source area, the primary origin of sulfate includes mineral dissolution, atmospheric deposition, and other anthropogenic sources (Miao et al., 2012). As water moves through soil and rock formations that contain sulfate minerals, some of the sulfate dissolves into the groundwater. Minerals that contain sulfate include magnesium sulfate (Epsom salt), sodium sulfate (Glauber's salt), and calcium sulfate (gypsum). Gypsum is an important contributor to the high levels of sulphate in many aquifers of the world. Elevated concentrations of sulfate in groundwater are common in the western part of the United States (MDH, 2008).

Sulfate is mobile in soil and inputs to soil will impact groundwater. Research investigations indicate that atmospheric deposition, dissolution of gypsum, oxidation of sulfide mineral, and anthropogenic inputs will contribute to elevated sulfate concentrations in groundwater. Based on the hydrogeology at the SWDA Landfill, atmospheric deposition and anthropogenic activities could be impacting sulfate concentrations (Einsiedl & Mayer, 2005; Pu et al., 2012).

Section 3
Alternative Source Demonstration

The 16th semi-annual detection monitoring event was conducted on February 28, 2025, per 30 TAC Chapter 352. Statistical evaluation of the results (comparison of downgradient monitoring results to 95 percent confidence/95 percent coverage upper tolerance limits [UTLs]) was performed within 60 days of sample collection to identify apparent SSIs above background pursuant to 30 TAC 352, Subpart H. Three apparent SSIs were identified: calcium, sulfate, and pH.

Statistical evaluation to identify SSIs for the verification sampling was performed within 60 days of sample collection. Two apparent SSIs were confirmed: calcium and sulfate. Based on the results of the verification sampling and statistical analysis, NRG notified the TCEQ of its intent to prepare an ASD addressing the apparent SSIs.

The UTLs and sampling results for the for the apparent SSIs are provided in Table 2 below.

Table 2. SSIs – February 28, 2025, Semi-Annual Detection Monitoring

ANALYTE	WELL	LTL	UTL	SAMPLE DATE	VALUE	UNIT
UPGRADIENT MONITORING WELLS						
Calcium	MW-23R	N/A	418	02/28/2025	547	mg/L
Sulfate	MW-23R	N/A	673	02/28/2025	1,720	mg/L

mg/L= milligrams per liter N/A = Not Applicable
LTL – Lower Tolerance Limit UTL – Upper Tolerance Limit s.u. – Standard Units

MW-23R is located hydraulically upgradient of the SWDA and is an upgradient background monitoring location for the SWDA Landfill. Therefore, the apparent calcium, sulfate, and pH SSIs observed for MW-23R are likely associated with natural variations in the geochemistry of groundwater in the aquifer and are not related to a release from the SWDA Landfill.

As discussed previously in subsection 2.2 of this ASD, on November 7, 2024, during installation of monitor well MW-61R at the E-Pond to replace MW-61 as part of the construction of a ZLD wastewater treatment facility, soil samples of native subsurface soils were collected and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron and sulfate, which are the apparent SSIs for this 16th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4’ bgs	27-27’bgs
Calcium	3,260 mg/kg	41,600 mg/Kg
Sulfate	57.3 mg/Kg	83.0 mg/Kg

Based on the consistency of the subsurface soils at the Station, and the close proximity of the SWDA to the E-Pond, the subsurface soil laboratory analytical results for the E-Pond are considered to be representative for both CCR Units. As shown in the above table, the concentrations of calcium and sulfate in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

pH and sulfate were identified as apparent SSI in downgradient monitoring wells. The pH values were slightly less than the LTL for pH and the sulfate concentration was slightly greater than its UTL. As discussed previously in subsection 2.3, Groundwater Geochemistry, natural variability in groundwater concentration is anticipated. Therefore, it is likely that the minor fluctuations in pH values and sulfate in monitor wells hydraulically downgradient of the SWDA Landfill are associated with natural variations in the geochemistry of groundwater in the aquifer such as pH and oxidation-reduction potential (ORP) and are not related to a release from the SWDA Landfill.

Section 4
Conclusions

Based on statistical evaluation of February 28, 2025, semi-annual detection monitoring event, two apparent SSIs: calcium and sulfate were identified in upgradient background monitor well MW-23R. This ASD has identified the following lines of reasoning that support alternative sources for the apparent SSIs:

- Natural variations in upgradient background groundwater quality; and
- Enhanced minerals dissolution and changes in geochemical conditions within the aquifer; and
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Therefore, based on the lines of reasoning presented in this ASD, alternative sources other than a release from the SWDA Landfill have been shown to be responsible for all two apparent SSIs observed in upgradient background monitoring MW-23R. Based on preparation of this successful ASD, NRG will continue semi-annual detection monitoring for the SWDA Landfill per 30 TAC Chapter 352.

Section 5
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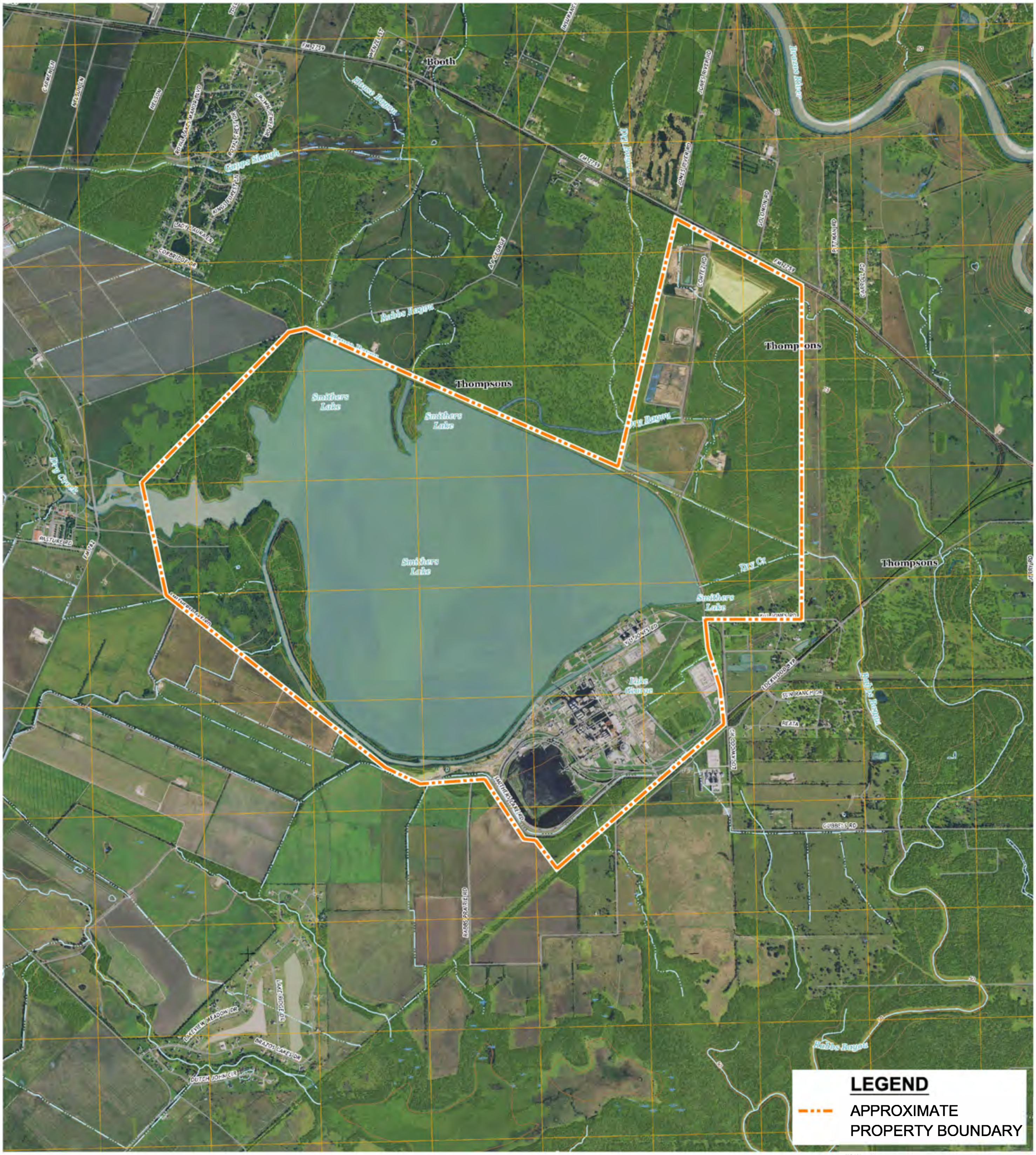
Figures



REFERENCE: U.S.G.S. 7.5 MINUTE TOPOGRAPHIC QUADRANGLES
MISSOURI CITY, TEXAS (2016) / SMITHERS LAKE, TEXAS (2016) / SUGAR LAND, TEXAS (2016) / THOMPSONS, TEXAS (2016)

TEXAS
QUADRANGLE LOCATION

0 2,000' 4,000' 8,000'

SCALE IN FEET
1" = 4,000'-0"

CLIENT / PROJECT

NRG TEXAS POWER, LLC
W.A. Parish Station
Thompsons, Texas

TITLE

SITE LOCATION MAP

DRAWN BY: **O. Fonseka**	REQUEST BY: **J. Atwell**	PROJECT NO. **649506**
DWG. DATE: **January 2025**	PROJECT-MGR: **T. Dworaczyk**	

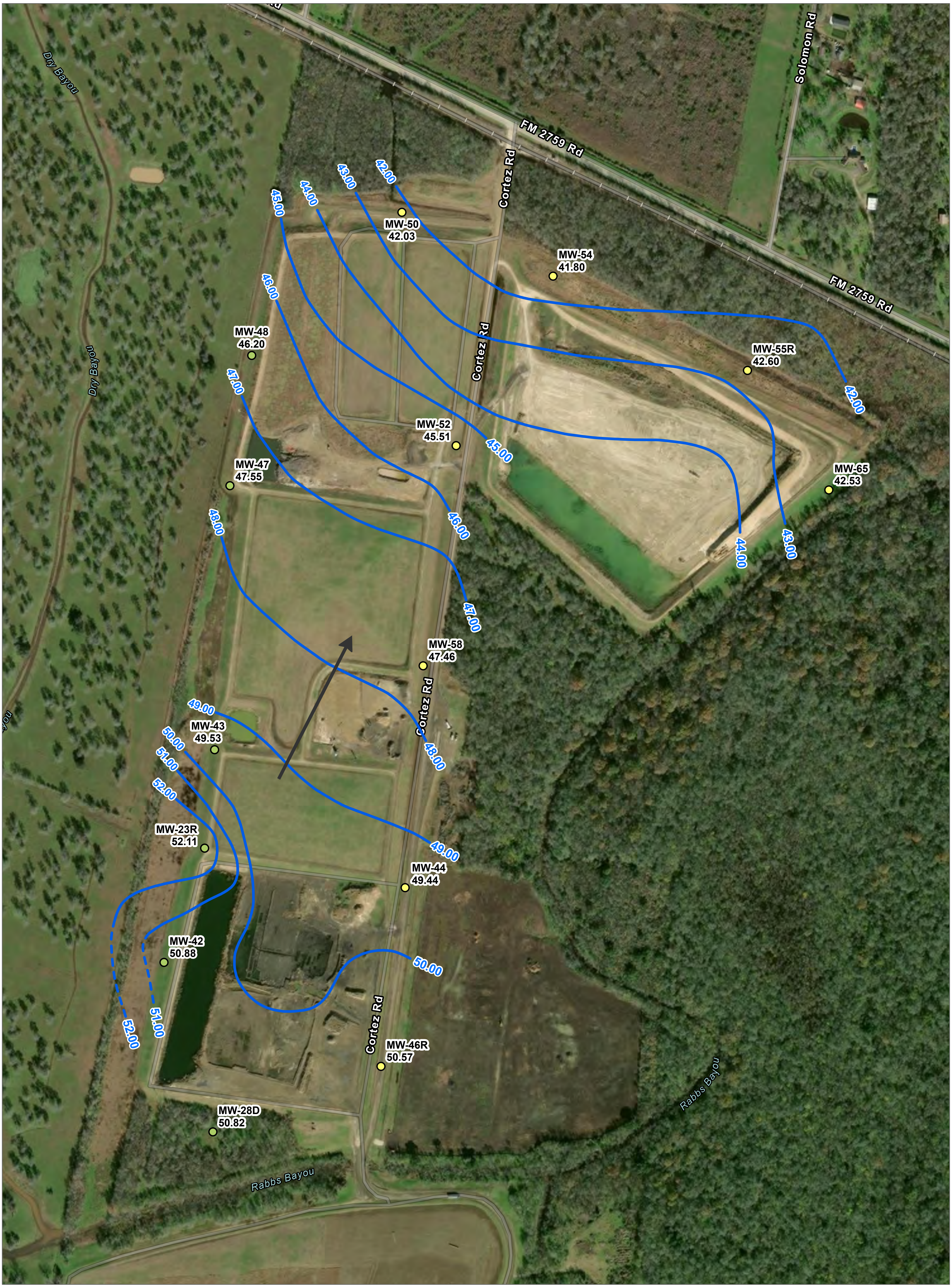
TRC
11767 KATY FREEWAY, SUITE 850
HOUSTON, TEXAS 77079
PHONE: 281-616-0100
TRCcompanies.com

FIGURE
1

LAST EDIT: 01/22/2025 - FILE LOCATION: HOU C:\OF-TRC\DRAFTING-CDrive\ECR-Files\NRG\W.A. Parish Station - Thompsons-TX\2025\ Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg

DRAWING By: Oskar Fonseka - FILE NAME: Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg

COORDINATE SYSTEM: NAD 1983 2011 STATEPLANE TEXAS SOUTH CENTRAL FIPS 4204 FTUS; MAP ROTATION: 0
-- SAVED BY: MBILLINGS ON 7/23/2025, 15:18:24 PM; FILE PATH: T:\1-PROJECTS\NRG\649506_WA_PARISHSTATION_TEXAS\2-APRX\PARISHSTATION_TX_FIGURES.APRX; LAYOUT NAME: FIG2-4_SWDA_11X17P



MULTIUNIT UPGRADIENT MONITOR WELL

MULTIUNIT DOWNGRADIENT MONITOR WELL

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR - DASHED WHERE INFERRED (FT MSL)

STATE OF TEXAS
ANTHONY DWORACZYK
GEOLOGY
2658
LICENSED
PROFESSIONAL GEOSCIENTIST

7/23/2025

PROJECT:	NRG TEXAS POWER, LLC W.A. PARISH STATION THOMPSONS, TEXAS
TITLE:	SOLID WASTE DISPOSAL AREA GROUNDWATER POTENTIOMETRIC SURFACE MAP FEBRUARY 2025
DRAWN BY:	M. BILLINGS
PROJ. NO.:	649506
CHECKED BY:	S. MOTURI
APPROVED BY:	J. ATWELL
DATE:	JULY 2025
	FIGURE 2

BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

NOTE: GROUNDWATER ELEVATION MEASURED BY HMI ON FEBRUARY 2025.

N

0 250 500 FEET

1:6,000 1" = 500'

TRC

11767 KATY FREEWAY
SUITE 850
HOUSTON, TX 77079
PHONE: 713.244.1000

FILE: PARISHSTATION_TX_FIGURES

Appendix A

10450 Stancliff Rd. Suite 210
Houston, TX 77099
T: +1 281 530 5656
F: +1 281 530 5887

November 14, 2024

Jessica Atwell
TRC
14701 St. Mary's Lane
Suite 500
Houston, TX 77079

Work Order: **HS24110381**

Laboratory Results for: **NRG Parish Well Install**

Dear Jessica Atwell,

ALS Environmental received 2 sample(s) on Nov 07, 2024 for the analysis presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Generated By: JUMOKE.LAWAL

Andy C. Neir

Client: TRC
Project: NRG Parish Well Install
Work Order: HS24110381

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS24110381-01	MW-61R 3'-4'	Solid		07-Nov-2024 12:45	07-Nov-2024 16:35	☐
HS24110381-02	MW-61R 26-27'	Solid		07-Nov-2024 12:50	07-Nov-2024 16:35	☐

Client: TRC
Project: NRG Parish Well Install
Work Order: HS24110381

CASE NARRATIVE

Metals by Method SW6020A

Batch ID: 220344

Sample ID: HS24110062-01MS

- MS and MSD are for an unrelated sample

Metals by Method SW7471B

Batch ID: 220285

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

Wet Chemistry by Method SW9056

Batch ID: 220398

Sample ID: HS24110357-20MS

- MS and MSD are for an unrelated sample

WetChemistry by Method SW9045D

Batch ID: R499760

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

WetChemistry by Method ASTM D2216

Batch ID: R499652

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG Parish Well Install		WorkOrder:HS24110381
Sample ID:	MW-61R 3'-4'		Lab ID:HS24110381-01
Collection Date:	07-Nov-2024 12:45		Matrix:Solid

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
METALS BY SW6020A		Method:SW6020A			Prep:SW3050B / 11-Nov-2024		Analyst: MSC
Antimony	U		0.0603	0.464	mg/Kg	1	12-Nov-2024 20:30
Arsenic	**1.36**		**0.0650**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Barium	**105**		**0.0278**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Beryllium	**0.656**		**0.0195**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Boron	**3.39**		**0.715**	**2.32**	**mg/Kg**	1	12-Nov-2024 20:30
Cadmium	U		0.0251	0.464	mg/Kg	1	12-Nov-2024 20:30
Calcium	**3,260**		**4.60**	**46.4**	**mg/Kg**	1	12-Nov-2024 20:30
Chromium	**9.36**		**0.0213**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Cobalt	**2.99**		**0.0139**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Lead	**9.50**		**0.0121**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Lithium	**5.51**		**0.0557**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Molybdenum	**0.131**	J	**0.0167**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Selenium	**0.649**		**0.0844**	**0.464**	**mg/Kg**	1	12-Nov-2024 20:30
Thallium	U		0.207	0.464	mg/Kg	1	13-Nov-2024 11:59
MERCURY BY SW7471B		Method:SW7471B			Prep:SW7471B / 08-Nov-2024		Analyst: DH
Mercury	**11.4**		**0.496**	**3.51**	**ug/Kg**	1	11-Nov-2024 15:28
MOISTURE - ASTM D2216		Method:ASTM D2216					Analyst: DFF
Percent Moisture	**13.9**		**0.0100**	**0.0100**	**wt%**	1	11-Nov-2024 14:27
PH SOIL BY SW9045D		Method:SW9045D					Analyst: CD
pH	**8.86**		**0.100**	**0.100**	**pH Units**	1	12-Nov-2024 16:00
Temp Deg C @pH	**20.4**		**0**	**0**	**°C**	1	12-Nov-2024 16:00
ANIONS BY SW9056A		Method:SW9056			Prep:SW9056 / 12-Nov-2024		Analyst: HB
Chloride	**15.5**		**2.00**	**5.00**	**mg/Kg**	1	13-Nov-2024 12:21
Fluoride	**5.49**		**0.300**	**1.00**	**mg/Kg**	1	13-Nov-2024 12:21
Sulfate	**57.3**		**2.00**	**5.00**	**mg/Kg**	1	13-Nov-2024 12:21

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client:	TRC		**ANALYTICAL REPORT**
Project:	NRG Parish Well Install	WorkOrder:	HS24110381
Sample ID:	MW-61R 26-27'	Lab ID:	HS24110381-02
Collection Date:	07-Nov-2024 12:50	Matrix:	Solid

ANALYSES	RESULT	QUAL	MDL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
METALS BY SW6020A		Method:SW6020A			Prep:SW3050B / 11-Nov-2024		Analyst: MSC
Antimony	**0.161**	J	**0.0618**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Arsenic	**7.81**		**0.0666**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Barium	**52.1**		**0.0285**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Beryllium	**1.09**		**0.0200**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Boron	**7.35**		**0.733**	**2.38**	**mg/Kg**	1	12-Nov-2024 20:33
Cadmium	**0.0441**	J	**0.0257**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Calcium	**41,600**		**472**	**4760**	**mg/Kg**	100	13-Nov-2024 12:31
Chromium	**22.7**		**0.0219**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Cobalt	**10.7**		**0.0143**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Lead	**12.1**		**0.0124**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Lithium	**16.8**		**0.0571**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Molybdenum	**0.507**		**0.0171**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Selenium	**0.628**		**0.0866**	**0.476**	**mg/Kg**	1	12-Nov-2024 20:33
Thallium	U		0.212	0.476	mg/Kg	1	13-Nov-2024 11:52
MERCURY BY SW7471B		Method:SW7471B			Prep:SW7471B / 08-Nov-2024		Analyst: DH
Mercury	**5.92**		**0.497**	**3.51**	**ug/Kg**	1	11-Nov-2024 15:33
MOISTURE - ASTM D2216		Method:ASTM D2216					Analyst: DFF
Percent Moisture	**19.7**		**0.0100**	**0.0100**	**wt%**	1	11-Nov-2024 14:27
PH SOIL BY SW9045D		Method:SW9045D					Analyst: CD
pH	**8.95**		**0.100**	**0.100**	**pH Units**	1	12-Nov-2024 16:00
Temp Deg C @pH	**20.2**		**0**	**0**	**°C**	1	12-Nov-2024 16:00
ANIONS BY SW9056A		Method:SW9056			Prep:SW9056 / 12-Nov-2024		Analyst: HB
Chloride	**44.9**		**1.99**	**4.97**	**mg/Kg**	1	14-Nov-2024 03:50
Fluoride	**2.32**		**0.298**	**0.994**	**mg/Kg**	1	14-Nov-2024 03:50
Sulfate	**83.0**		**1.99**	**4.97**	**mg/Kg**	1	14-Nov-2024 03:50

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Weight / Prep Log

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

Batch ID: 220285 **Start Date:** 08 Nov 2024 10:17 **End Date:** 08 Nov 2024 10:17
Method: MERCURY PREP - SOLID - 7471B **Prep Code:** HG_S_LOWPR

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS24110381-01		0.5688 (grams)	40 (mL)	70.32	4-oz glass, Neat
HS24110381-02		0.5678 (grams)	40 (mL)	70.45	4-oz glass, Neat

Batch ID: 220344 **Start Date:** 11 Nov 2024 08:00 **End Date:** 11 Nov 2024 08:00
Method: METALS PREP - SOLIDS - SW3050B **Prep Code:** 3050_I_LOW

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS24110381-01		0.5388 (g)	50 (mL)	92.8	4-oz glass, Neat
HS24110381-02		0.5255 (g)	50 (mL)	95.15	4-oz glass, Neat

Batch ID: 220398 **Start Date:** 12 Nov 2024 07:55 **End Date:** 12 Nov 2024 07:55
Method: 9056 ANIONS SOIL PREP **Prep Code:** 9056_S_PR

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS24110381-01		5.0009 (g)	50 (mL)	9.998	4-oz glass, Neat
HS24110381-02		5.0321 (g)	50 (mL)	9.936	4-oz glass, Neat

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: 220285 (0)	**Test Name :** MERCURY BY SW7471B				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		08 Nov 2024 10:17	11 Nov 2024 15:28	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		08 Nov 2024 10:17	11 Nov 2024 15:33	1
Batch ID: 220344 (0)	**Test Name :** METALS BY SW6020A				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		11 Nov 2024 08:00	13 Nov 2024 11:59	1
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		11 Nov 2024 08:00	12 Nov 2024 20:30	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		11 Nov 2024 08:00	13 Nov 2024 12:31	100
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		11 Nov 2024 08:00	13 Nov 2024 11:52	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		11 Nov 2024 08:00	12 Nov 2024 20:33	1
Batch ID: 220398 (0)	**Test Name :** ANIONS BY SW9056A				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45		12 Nov 2024 07:55	13 Nov 2024 12:21	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50		12 Nov 2024 07:55	14 Nov 2024 03:50	1
Batch ID: R499652 (0)	**Test Name :** MOISTURE - ASTM D2216				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45			11 Nov 2024 14:27	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50			11 Nov 2024 14:27	1
Batch ID: R499760 (0)	**Test Name :** PH SOIL BY SW9045D				**Matrix:** Solid	
HS24110381-01	MW-61R 3'-4'	07 Nov 2024 12:45			12 Nov 2024 16:00	1
HS24110381-02	MW-61R 26-27'	07 Nov 2024 12:50			12 Nov 2024 16:00	1

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220285 (0) **Instrument:** HG04 **Method:** MERCURY BY SW7471B

MBLK Sample ID: **MBLK-220285** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:52**
Client ID: Run ID: **HG04_499583** SeqNo: **8507469** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	1.067	3.32								J

LCS Sample ID: **LCS-220285** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:54**
Client ID: Run ID: **HG04_499583** SeqNo: **8507470** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	337.3	3.32	333.3	0	101	85 - 115				

MS Sample ID: **HS24110339-01MS** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:57**
Client ID: Run ID: **HG04_499583** SeqNo: **8507472** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	397.9	3.48	348.4	37.79	103	85 - 115				

MSD Sample ID: **HS24110339-01MSD** Units: **ug/Kg** Analysis Date: **11-Nov-2024 14:59**
Client ID: Run ID: **HG04_499583** SeqNo: **8507473** PrepDate: **08-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	396.8	3.50	350.5	37.79	102	85 - 115	397.9	0.285	20	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

MBLK Sample ID: **MBLK-220344** Units: **mg/Kg** Analysis Date: **12-Nov-2024 19:58**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518799** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	U	0.497								
Arsenic	U	0.497								
Barium	U	0.497								
Beryllium	U	0.497								
Boron	U	2.49								
Cadmium	U	0.497								
Calcium	U	49.7								
Chromium	U	0.497								
Cobalt	U	0.497								
Lead	U	0.497								
Lithium	U	0.497								
Molybdenum	U	0.497								
Selenium	U	0.497								
Thallium	U	0.497								

LCS Sample ID: **LCS-220344** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:00**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518800** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	9.149	0.497	9.932	0	92.1	80 - 120				
Arsenic	9.451	0.497	9.932	0	95.1	80 - 120				
Barium	9.335	0.497	9.932	0	94.0	80 - 120				
Beryllium	9.673	0.497	9.932	0	97.4	80 - 120				
Boron	47.36	2.48	49.66	0	95.4	80 - 120				
Cadmium	9.274	0.497	9.932	0	93.4	80 - 120				
Calcium	927.6	49.7	993.2	0	93.4	80 - 120				
Chromium	9.272	0.497	9.932	0	93.4	80 - 120				
Cobalt	9.372	0.497	9.932	0	94.4	80 - 120				
Lead	9.424	0.497	9.932	0	94.9	80 - 120				
Lithium	9.329	0.497	9.932	0	93.9	80 - 120				
Molybdenum	9.035	0.497	9.932	0	91.0	80 - 120				
Selenium	9.439	0.497	9.932	0	95.0	80 - 120				
Thallium	8.893	0.497	9.932	0	89.5	80 - 120				

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

MS Sample ID: **HS24110062-01MS** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:15**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518830** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	6.629	0.474	9.471	0.7615	61.9	75 - 125				S
Arsenic	29.15	0.474	9.471	18.57	112	75 - 125				
Barium	152.6	0.474	9.471	149.3	34.5	75 - 125				SO
Beryllium	10.73	0.474	9.471	1.227	100	75 - 125				
Boron	45.07	2.37	47.36	6.499	81.5	75 - 125				
Cadmium	9.454	0.474	9.471	0.4038	95.5	75 - 125				
Calcium	14700	47.4	947.1	14780	-8.68	75 - 125				SO
Chromium	38.89	0.474	9.471	25.29	144	75 - 125				S
Cobalt	16.53	0.474	9.471	6.896	102	75 - 125				
Lead	123.3	0.474	9.471	96	288	75 - 125				SO
Lithium	20.74	0.474	9.471	10.31	110	75 - 125				E
Molybdenum	9.214	0.474	9.471	0.9538	87.2	75 - 125				
Selenium	10.35	0.474	9.471	1.466	93.8	75 - 125				

MS Sample ID: **HS24110062-01MS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:44**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520246** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Thallium	7.282	0.474	9.471	0.2701	74.0	75 - 125				S

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

MSD Sample ID: **HS24110062-01MSD** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:18**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518831** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	4.836	0.469	9.376	0.7615	43.5	75 - 125	6.629	31.3	20	SR
Arsenic	26.2	0.469	9.376	18.57	81.4	75 - 125	29.15	10.6	20	
Barium	101.1	0.469	9.376	149.3	-514	75 - 125	152.6	40.5	20	SRO
Beryllium	9.769	0.469	9.376	1.227	91.1	75 - 125	10.73	9.42	20	
Boron	51.59	2.34	46.88	6.499	96.2	75 - 125	45.07	13.5	20	
Cadmium	9.036	0.469	9.376	0.4038	92.1	75 - 125	9.454	4.52	20	
Calcium	18320	46.9	937.6	14780	377	75 - 125	14700	21.9	20	SREO
Chromium	38.06	0.469	9.376	25.29	136	75 - 125	38.89	2.15	20	S
Cobalt	16.54	0.469	9.376	6.896	103	75 - 125	16.53	0.0872	20	
Lead	104.4	0.469	9.376	96	89.7	75 - 125	123.3	16.6	20	O
Lithium	18.63	0.469	9.376	10.31	88.7	75 - 125	20.74	10.7	20	
Molybdenum	8.434	0.469	9.376	0.9538	79.8	75 - 125	9.214	8.84	20	
Selenium	10.03	0.469	9.376	1.466	91.3	75 - 125	10.35	3.16	20	

MSD Sample ID: **HS24110062-01MSD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:47**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520247** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Thallium	7.099	0.469	9.376	0.2701	72.8	75 - 125	7.282	2.55	20	S

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

PDS Sample ID: **HS24110062-01PDS** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:20**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518832** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Antimony	9.917	0.481	9.628	0.7615	95.1	75 - 125				
Arsenic	27.95	0.481	9.628	18.57	97.3	75 - 125				
Barium	159.8	0.481	9.628	149.3	109	75 - 125				O
Beryllium	10.89	0.481	9.628	1.227	100	75 - 125				
Boron	56.88	2.41	48.14	6.499	105	75 - 125				
Cadmium	9.685	0.481	9.628	0.4038	96.4	75 - 125				
Calcium	15660	48.1	962.8	14780	91.2	75 - 125				O
Chromium	34.91	0.481	9.628	25.29	100.0	75 - 125				
Cobalt	16.55	0.481	9.628	6.896	100	75 - 125				
Lead	104.5	0.481	9.628	96	88.2	75 - 125				O
Molybdenum	10.09	0.481	9.628	0.9538	94.9	75 - 125				
Selenium	11.1	0.481	9.628	1.466	100	75 - 125				

PDS Sample ID: **HS24110062-01PDS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:54**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520250** PrepDate: **11-Nov-2024** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Lithium	56.08	2.41	48.14	10.12	95.5	75 - 125				

PDS Sample ID: **HS24110062-01PDS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:49**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520248** PrepDate: **11-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Thallium	9.363	0.481	9.628	0.2701	94.4	75 - 125				

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220344 (0) **Instrument:** ICPMS07 **Method:** METALS BY SW6020A

SD Sample ID: **HS24110062-01SD** Units: **mg/Kg** Analysis Date: **12-Nov-2024 20:13**
Client ID: Run ID: **ICPMS07_499696** SeqNo: **8518829** PrepDate: **11-Nov-2024** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Antimony	0.8346	2.41					0.7615	0	10	J
Arsenic	19.53	2.41					18.57	5.15	10	
Barium	155.3	2.41					149.3	4.03	10	
Beryllium	1.251	2.41					1.227	0	10	J
Boron	8.563	12.0					6.499	0	10	J
Cadmium	0.4212	2.41					0.4038	0	10	J
Calcium	14990	241					14780	1.41	10	
Chromium	25.62	2.41					25.29	1.3	10	
Cobalt	7.369	2.41					6.896	6.87	10	
Lead	99.46	2.41					96	3.6	10	
Molybdenum	0.9704	2.41					0.9538	0	10	J
Selenium	1.638	2.41					1.466	0	10	J

SD Sample ID: **HS24110062-01SD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:57**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520251** PrepDate: **11-Nov-2024** DF: **25**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Lithium	10.99	12.0					10.12	0	10	J

SD Sample ID: **HS24110062-01SD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:42**
Client ID: Run ID: **ICPMS07_499812** SeqNo: **8520245** PrepDate: **11-Nov-2024** DF: **5**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%D	%D Limit	Qual
Thallium	U	2.41					0.2701	0	10	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: 220398 (0) **Instrument:** ICS-Integrion **Method:** ANIONS BY SW9056A

MBLK Sample ID: **MBLK-220398** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:41**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521384** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	U	5.00								
Fluoride	U	1.00								
Sulfate	2.013	5.00								J

LCS Sample ID: **LCS-220398** Units: **mg/Kg** Analysis Date: **13-Nov-2024 11:49**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521385** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	200.7	5.00	200	0	100	80 - 120				
Fluoride	42.08	1.00	40	0	105	80 - 120				
Sulfate	208.3	5.00	200	0	104	80 - 120				

MS Sample ID: **HS24110357-20MS** Units: **mg/Kg** Analysis Date: **13-Nov-2024 12:05**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521387** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	994.2	4.97	99.45	908.7	86.0	80 - 120				O
Fluoride	35.61	0.995	19.89	10.87	124	80 - 120				S
Sulfate	122.1	4.97	99.45	6.445	116	80 - 120				

MSD Sample ID: **HS24110357-20MSD** Units: **mg/Kg** Analysis Date: **13-Nov-2024 12:13**
Client ID: Run ID: **ICS-Integrion_499882** SeqNo: **8521388** PrepDate: **12-Nov-2024** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	996.9	4.97	99.35	908.7	88.7	80 - 120	994.2	0.265	20	EO
Fluoride	35.79	0.993	19.87	10.87	125	80 - 120	35.61	0.484	20	S
Sulfate	121.8	4.97	99.35	6.445	116	80 - 120	122.1	0.261	20	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: R499652 (0) **Instrument:** Balance1 **Method:** MOISTURE - ASTM D2216

DUP Sample ID: **HS24110389-04DUP** Units: **wt%** Analysis Date: **11-Nov-2024 14:27**
Client ID: Run ID: **Balance1_499652** SeqNo: **8509159** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Percent Moisture	14.7	0.0100					14.5	1.37	20	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client: TRC
Project: NRG Parish Well Install
WorkOrder: HS24110381

QC BATCH REPORT

Batch ID: **R499760 (0)** **Instrument:** **WetChem_HS** **Method:** **PH SOIL BY SW9045D**

DUP Sample ID: **HS24110381-01DUP** Units: **pH Units** Analysis Date: **12-Nov-2024 16:00**

Client ID: **MW-61R 3'-4'** Run ID: **WetChem_HS_499760** SeqNo: **8519095** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
pH	8.89	0.100					8.86	0.338	10	
Temp Deg C @pH	20.4	0					20.4	0	10	

The following samples were analyzed in this batch: HS24110381-01 HS24110381-02

Client:	TRC	**QUALIFIERS, ACRONYMS, UNITS**
Project:	NRG Parish Well Install	
WorkOrder:	**HS24110381**	

Qualifier	Description
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte detected below quantitation limit
M	Manually integrated, see raw data for justification
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL/SDL

Acronym	Description
DCS	Detectability Check Study
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitaion Limit
SD	Serial Dilution
SDL	Sample Detection Limit
TRRP	Texas Risk Reduction Program

CERTIFICATIONS,ACCREDITATIONS & LICENSES

Agency	Number	Expire Date
Arizona	AZ0793	27-May-2025
Arkansas	88-00356_2024	27-Mar-2025
California	2919; 2025	30-Apr-2025
Dept of Defense	L24-240	30-Apr-2026
Dept of Defense	L24-239	30-Apr-2026
Florida	E87611-38	30-Jun-2025
Illinois	2000322023-11	31-Jul-2025
Kansas	E-10352 2023-2024	31-Jul-2025
Kentucky	123043	30-Apr-2025
Louisiana	03087 2023-2024	30-Jun-2025
Maine	2024017	23-Jun-2026
Michigan	9971	30-Apr-2025
Nebraska	NE-OS-25-13	30-Apr-2025
New Jersey	TX008	30-Jun-2025
North Carolina	624 - 2024	31-Dec-2024
Pennsylvania	018	30-Jun-2025
Tennessee	04016	30-Apr-2025
Texas	T104704231 TX-C24-00130	30-Apr-2025
Utah	TX026932023-14	31-Jul-2025

Sample Receipt Checklist

Work Order ID: HS24110381
Client Name: TRC-HOU
Date/Time Received: **07-Nov-2024 16:35**
Received by: **Travis Appling**

Completed By: */S/ Travis Appling* (eSignature) 07-Nov-2024 17:46 (Date/Time)
Reviewed by: */S/ Alexis Dorenbosch* (eSignature) 08-Nov-2024 10:53 (Date/Time)

Matrices: **S**
Carrier name: **Client**

	Yes	No	
Shipping container/cooler in good condition?	☑	☐	Not Present ☐
Custody seals intact on shipping container/cooler?	☐	☐	Not Present ☑
Custody seals intact on sample bottles?	☐	☐	Not Present ☑
VOA/TX1005/TX1006 Solids in hermetically sealed vials?	☐	☐	Not Present ☑
Chain of custody present?	☑	☐	1 Page(s)
Chain of custody signed when relinquished and received?	☑	☐	COC IDs:329698
Samplers name present on COC?	☑	☐	
Chain of custody agrees with sample labels?	☑	☐	
Samples in proper container/bottle?	☑	☐	
Sample containers intact?	☑	☐	
Sufficient sample volume for indicated test?	☑	☐	
All samples received within holding time?	☑	☐	
Container/Temp Blank temperature in compliance?	☑	☐	

Temperature(s)/Thermometer(s):	0.8UC/ 0.8C	IR36
Cooler(s)/Kit(s):	50741	
Date/Time sample(s) sent to storage:	11/7/2024 17:46	

	Yes	No	
Water - VOA vials have zero headspace?	☐	☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	☐	☐	N/A ☑
pH adjusted?	☐	☐	N/A ☑

pH adjusted by:

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

Corrective Action:

Cincinnati, OH +1 513 733 5336 · Fort Collins, CO +1 970 490 1511
Everett, WA +1 425 356 2600 · Holland, MI +1 616 399 6070

Chain of Custody Form

Page 1 of 1

COC ID: 329698

TRC
NRG Parish Well Install

ALS Project Manager:

Customer Information		Project Information			
Purchase Order	[illegible]	Project Name	[illegible]	A	[illegible]
Work Order		Project Number		B	[illegible]
Company Name	[illegible]	Bill To Company	[illegible]	C	[illegible]
Send Report To	[illegible]	Invoice Attn	[illegible]	D	[illegible]
Address	[illegible]	Address	[illegible]	E	[illegible]
				F	
City/State/Zip	[illegible]	City/State/Zip	[illegible]	G	
Phone	[illegible]	Phone	[illegible]	H	
Fax	[illegible]	Fax	[illegible]	I	
e-Mail Address	[illegible]	e-Mail Address	[illegible]	J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	MW-61R 3'-4'	11/07/24	1245	S	—	1	X	X	X	X	X						
2	MW-61R 26-27'	11/07/24	1250	S	—	1	X	X	X	X	X						
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign: Candida Conde [signature]

Shipment Method:

Required Turnaround Time: (Check Box)

Results Due Date:

Relinquished by: [signature]	Date: 11/07/24	Time: 1635	Received by:
Relinquished by:	Date: 11/7/24	Time: 1635	Received by (Laboratory): [signature] TJA
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory):

Notes: [illegible]

Cooler ID	Cooler Temp.
	CF 0°
50141	0.8
	IR36

QC Package: (Check One Box Below)

Preservative Key: 1-HCl 2-HNO_3 3-H_2SO_4 4-NaOH 5-$Na_2S_2O_3$ 6-$NaHSO_4$ 7-Other 8-4°C 9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited to the terms and conditions stated on the reverse.
3. The Chain of Custody is a legal document. All information must be completed accurately.

11767 Katy Freeway, Suite 850 Houston, TX 77079
T 281.616.0100 TRCcompanies.com

December 22, 2025

Mr. Martin Torres
Section Manager
Industrial and Hazardous Waste Permits Section – MC-130
Texas Commission on Environmental Quality
PO Box 13087
Austin, Texas 78711-3087

Subject: CCR Alternate Source Demonstrations
NRG Texas W.A Parish Electric Generating Station Industrial Solid Waste Registration No. 31631
EPA Identification No. TXD097311849
RN10088312/CN603207218, CCR108

Transmitted via email CCRNotify@tceq.texas.gov

Dear Mr. Torres,

On behalf of NRG Texas, TRC is submitting enclosed the Alternate Source Demonstrations (ASDS) for the NRG W.A. Parish Electric Generating Station

NRG will continue to comply with the Texas Coal Combustion Residuals Program (CCR), Chapter 352 CCR Waste Management Rules. As always, NRG continues to be committed to working with the TCEQ and partner with the communities they serve; their common goal is the protectiveness of human health and the environment in the areas surrounding operations at their facilities.

Please do not hesitate to contact me via email at adworaczyk@trccompanies.com or phone at 832-904-1925 if you need additional information or wish to discuss this request. As always, we continue to be committed to working with the TCEQ and partner with the communities we serve; our common goal is the protectiveness of human health and the environment in the areas surrounding operations at our facilities.

Sincerely,

Tony Dworaczyk, PG
Senior Project Manager
TRC

Cc: Craig Eckberg (NRG Director, Environmental Services
Carl Burch (NRG Environmental Manager)
Robert Been (NRG Sr. Environmental Specialist)

Texas Commission on Environmental Quality

Waste Permits Division Correspondence Cover Sheet

Date: December 22, 2025
Facility Name: NRG-WA Parish Generating Station
Permit or Registration No.: CCR108

Nature of Correspondence:
☒ Initial/New
☐ Response/Revision to TCEQ Tracking No.: ______ (from subject line of TCEQ letter regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Notifications
☐ New Notice of Intent	☐ Alternative Daily Cover Report
☐ Notice of Intent Revision	☐ Closure Report
☐ New Permit (including Subchapter T)	☐ Compost Report
☐ New Registration (including Subchapter T)	☒ Groundwater Alternate Source Demonstration
☐ Major Amendment	☐ Groundwater Corrective Action
☐ Minor Amendment	☐ Groundwater Monitoring Report
☐ Limited Scope Major Amendment	☐ Groundwater Background Evaluation
☐ Notice Modification	☐ Landfill Gas Corrective Action
☐ Non-Notice Modification	☐ Landfill Gas Monitoring
☐ Transfer/Name Change Modification	☐ Liner Evaluation Report
☐ Temporary Authorization	☐ Soil Boring Plan
☐ Voluntary Revocation	☐ Special Waste Request
☐ Subchapter T Disturbance Non-Enclosed Structure	☐ Other:
☐ Other:	

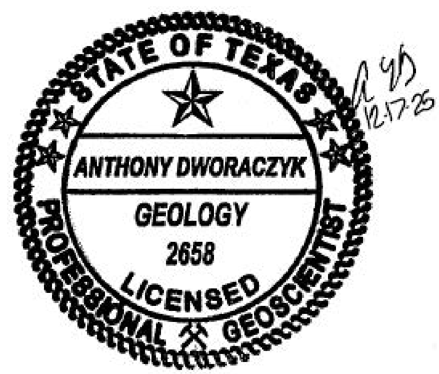
Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
☐ New	☐ Annual/Biennial Site Activity Report
☐ Renewal	☐ CPT Plan/Result
☐ Post-Closure Order	☐ Closure Certification/Report
☐ Major Amendment	☐ Construction Certification/Report
☐ Minor Amendment	☐ CPT Plan/Result
☐ CCR Registration	☐ Extension Request
☐ CCR Registration Major Amendment	☐ Groundwater Monitoring Report
☐ CCR Registration Minor Amendment	☐ Interim Status Change
☐ Class 3 Modification	☐ Interim Status Closure Plan
☐ Class 2 Modification	☐ Soil Core Monitoring Report
☐ Class 1 ED Modification	☐ Treatability Study
☐ Class 1 Modification	☐ Trial Burn Plan/Result
☐ Endorsement	☐ Unsaturated Zone Monitoring Report
☐ Temporary Authorization	☐ Waste Minimization Report
☐ Voluntary Revocation	☐ Other:
☐ 335.6 Notification	
☐ Other:	

I hereby certify that the alternative source demonstration presented within this document for the NRG WA Parish Coal Ash Disposal Landfill CCR Unit has been prepared to meet the requirements of 30 TAC 352.4; 352.941(c); and 352.1321. This document is accurate and has been prepared in accordance with good geosciences practices, including the consideration of applicable industry standards, and with the requirements of 30 TAC 352.4; 352.941(c); and 352.1321.

Name: Tony Dworaczyk **Expiration Date:** 1/30/2026

Company: TRC Environmental Corporation **Date:** 12/17/2025



Alternative Source Demonstration

W.A. Parish Electric Generating Station
Air Preheater Pond (SWMU 021)

December 2025

Prepared For
NRG Texas Power, LLC
Thompsons, Texas
TCEQ Coal Combustion Residuals (CCR) Registration No. CCR108
Industrial Solid Waste Registration No. 31631
EPA Identification No. TXD097311849

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Executive Summary

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas. Units managing coal combustion residuals (CCR) at the Station are subject to the requirements of 30 Texas Administrative Code (TAC) Chapter 352. CCR generated at the Station consists of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge. The Site has three active CCR management units that are subject to regulation under 30 TAC Chapter 32, including the Air Preheater Pond (APH) Pond, which is the subject of this Alternative Source Demonstration (ASD).

The 17th semi-annual groundwater detection monitoring event was conducted on August 8, 2025, and verification sampling was performed on September 5, 2025. Statistical evaluation of the results was performed to identify apparent statistically significant increases (SSIs) above background pursuant to 30 TAC 352 Subpart H. Four apparent SSIs, fluoride, boron, sulfate, and pH were identified at the APH Pond. NRG notified the Texas Commission on Environmental Quality (TCEQ) of its intent to prepare an ASD.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the second half of 2019 (July) through the first half of 2021 (April). February 28, 2025, semi-annual detection monitoring event analytical results and verification sampling results, are the eighth data set statistically evaluated using the new background water quality data set.

This ASD successfully identified alternative sources for apparent SSIs at the APH Pond, based on the following lines of reasoning:

- It appears that the construction activities that occurred during the retrofit of the APH Pond per the federal CCR Rule during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer as follows:
  - As a result of removal of water from the APH Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
  - Excavation of all CCR and decontamination of the APH Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
  - Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
  - As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are

anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.

- As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.
- Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition; and
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Therefore, since retrofit construction activities have been completed recently and it appears the uppermost aquifer system is continuing to re-equilibrate, NRG will continue performing semi-annual detection monitoring for the APH Pond per 30 TAC Chapter 352.

Section 1
Introduction

1.1 Background

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas, adjacent to Smithers Lake. The electricity generating portion of the Station, or the main Plant Operations Area (Plant Area), is located along the southeastern shore of the lake.

Management of coal combustion residuals (CCR) at the Station is performed pursuant to 30 Texas Administrative Code (TAC) Chapter 352, which became effective during June 2021. Prior to this, management of CCR was performed pursuant to the United States Environmental Protection Agency (USEPA) final rule for the regulation and management of CCR under the Resource Conservation and Recovery Act (RCRA) Title 40, Code of Federal Regulations, Part 257 (40 CFR §257) (CCR Rule, effective date October 19, 2015).

CCR generated at the Station consist of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge, which have been classified by the TCEQ as Class II nonhazardous waste. The Station has the following three active CCR-management units:

- Solid Waste Disposal Area (SWDA) (SWMU 001), which consists of four active CCR-management cells: Cell 1C, Cell 2A-Pug Mill, Cell 2B, and Cell 3; and is now monitored as a single CCR Multiunit;
- Air Preheater Pond (APH Pond, SWMU 021); and
- FGD Emergency Pond (E Pond, SWMU 020).

The APH Pond receives effluent from air preheater wash and boiler cleaning wash, which consists of fly ash or economizer ash particles and water. The APH Pond is located at the southern portion of the Plant Area as shown on Figure 1 and is the subject of this Alternative Source Demonstration (ASD).

1.1.1 Retrofit Construction Activities

During 2020 and 2021, the APH Pond was removed from service and retrofitted per §257.102(k) of the federal CCR Rule. As part of these activities, the CCR within the impoundment was dewatered, all water and CCR was removed from the impoundment, and the APH Pond area was decontaminated based on over-excavating a minimum of 6-inches of clay liner material after removal of CCR. After CCR removal and decontamination had been confirmed, a federal CCR Rule bottom composite liner system was then installed and the APH Pond was placed back into service as a CCR unit compliant with both the federal and TCEQ CCR programs.

During retrofit construction activities for the APH Pond, upgradient groundwater monitoring well MW-39 was apparently destroyed and could not be located during the April 2021 semi-annual detection monitoring event. Therefore, MW-39 was replaced by MW-39R that was installed in the approximate location of MW-39 prior to performance of the October 2021 semi-annual detection monitoring event.

Furthermore, during retrofit construction activities, it appears that the geochemistry and hydrogeology of the uppermost aquifer were altered as follows:

- As a result of removal of water from the APH Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
- Excavation of all CCR and decontamination of the APH Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
- Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
- As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.

As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.

1.1.2 Groundwater Monitoring Program

On behalf of NRG, Environmental Resources Management, Inc. (ERM) conducted eight independent background groundwater detection monitoring events for both the Appendix III and IV CCR constituents between April 2015 and August 2017 per §257.94(b) of the federal CCR Rule and the first semi-annual detection monitoring event in October 2017. Results of the eight background and first semi-annual detection monitoring events for the APH Pond were documented in the *Annual Groundwater Monitoring Report, Landfill (Unit 004)* (ERM 2018a) and the *Annual Groundwater Monitoring Report, APH Pond (Unit 021)* (ERM 2018a) and the March 1, 2018, *Groundwater Monitoring Report, APH Pond* (SWMU Unit 021) (ERM 2018b) pursuant to §257.90(e).

The Station has continued to conduct semi-annual detection monitoring at the APH Pond per the federal CCR Rule and 30 TAC Chapter 352. As of the August 8, 2025, sampling event, a total of 17 semi-annual detection monitoring events have now been performed. Following each semi-annual detection monitoring sampling event, the results have been evaluated for potential SSIs, and ASDs have been prepared as needed. Since implementation of 30 TAC Chapter 352, the ASDs have been submitted to TCEQ for review and approval. The semi-annual detection monitoring activities and ASDs have been included in the Annual Groundwater Monitoring and Corrective Action reports, which have been placed into the Facility Operating Record (FOR) and posted to NRG's publicly accessible website.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the third half of 2019 (July) through the first half of 2021 (April). August 8, semi-annual detection monitoring event analytical results are the ninth data set statistically evaluated using the new background water quality data set.

1.2 Purpose

TRC prepared this ASD to evaluate apparent SSIs above background levels for the 17th semi-annual detection monitoring event in accordance with 30 TAC Chapter 352.

Section 2
Site Geology and Hydrogeology

This section provides information about the geology and hydrogeology of the Station and the area at and surrounding the APH Pond.

2.1 Hydrogeology

According to the *Geologic Atlas of Texas, Houston Sheet* (BEG 1982), the Station is underlain by alluvium and the Beaumont formation (also commonly referred to as the Beaumont Clay). The alluvium is present along the Brazos River, which is located approximately 0.9 miles from the northern boundary of the SWDA CCR units. Both the alluvium and the Beaumont formation are composed of clay, silt, and sand; and may include stream channel, point-bar, natural levee, back swamp, coastal marsh, and mud-flat deposits. The thickness of the Beaumont formation is approximately 100 feet. The alluvium is not present at the Plant Area, which is consistent with this area being located outside of the Brazos River floodplain zone (FBC 2018). The APH Pond and the E Pond are both located at the Plant Area.

The alluvium and the Beaumont Formation are located within the upper unit of the Chicot aquifer system. At most locations throughout Fort Bend County, the Chicot aquifer system is under confined conditions (TWDB 1990). The Chicot aquifer system is primarily recharged by precipitation at locations where it outcrops in Austin, Harris, and Waller Counties; groundwater then flows laterally within Fort Bend County (TWDB 1990). Site investigations performed by others on behalf of NRG also indicate that the uppermost groundwater-bearing units at the site are under confined conditions (ERM 2017a).

Environmental investigations conducted in May 2016 and November 2016 by ERM identified three main subsurface strata at the Station, which were designated as Stratum DA-1 through DA-3 at the SWDA and stratum PA-1 through PA-3 at the Plant Area (APH Pond and E Pond). The strata are fully described in the October 2017 *CCR Groundwater Monitoring Networks* report (ERM 2017b) and are summarized below.

2.1.1 Stratum PA-1 (Upper Confining Unit)

Stratum PA-1 is predominately silty clay with some sandy clay, clay, and sandy silt. Stratum PA-1 is present from the ground surface to depths ranging from 15 feet bgs to 32 feet bgs.

Stratum PA-1 serves as a confining unit to underlying Stratum PA-2, which comprises the uppermost groundwater-bearing unit at the APH Pond and E Pond. Geotechnical laboratory testing indicates that the hydraulic conductivity of Stratum PA-1 is 2.03E-08 centimeters per second (cm/sec) (ERM 2017b).

2.1.2 Stratum PA-2 (Upper Aquifer)

Stratum PA-2 is predominantly silty sand with varying sand and silt content and trace clay. Stratum PA-2 is generally greater than 10 feet in thickness with bottom depths ranging from 60 to 80 feet bgs.

Stratum PA-2 is saturated and comprises the uppermost groundwater-bearing unit at the APH Pond and E Pond. CCR monitoring wells in the Plant Area are completed within Stratum PA-2. Slug testing results for CCR monitoring wells indicate hydraulic conductivity ranges from 6.68E-04 cm/sec to 4.26E-02 cm/sec in Stratum PA-2 (ERM 2017b). Groundwater primarily flows to the southwest beneath the E Pond, and to the southeast beneath the APH Pond.

2.1.3 Stratum PA-3 (Lower Confining Unit)

Stratum PA-3 is predominantly clay to silty clay. This stratum appears to be the bottom confining layer to the overlying groundwater-bearing unit (Stratum PA-2). The thickness of Stratum PA-3 has not been defined.

2.1.4 Air Preheater Pond - Certified Monitoring Network

The certified CCR groundwater monitoring well network for the APH Pond consists of six groundwater monitoring wells (MW-39R, MW-40, MW-41, MW-62, MW-63, and MW-64) completed into Stratum PA-2. A groundwater potentiometric surface map was prepared by TRC for the March 1, 2024, semi-annual detection monitoring event and is provided in this ASD as Figure 2. Historically, groundwater flows to the southeast beneath the APH Pond at a gradient ranging from approximately 0.002 feet per foot (ft/ft) to 0.006 ft/ft.

The groundwater monitoring system for the APH Pond was originally certified per the federal CCR Rule on October 17, 2017. The original certified CCR groundwater monitoring well network for the APH Pond designated one upgradient monitoring well (MW-62) and five downgradient monitoring wells (MW-39, MW-40, MW-41, MW-63, and MW-64). However, based on TRC's review of groundwater elevation data measured for the semi-annual detection monitoring events and preparation of potentiometric surface maps, two of the initially designated downgradient monitoring wells (MW-39 and MW-40) were found to be located upgradient of the APH Pond as shown on the March 1, 2024, groundwater potentiometric surface map (Figure 2). Therefore, the CCR monitoring well system for the APH Pond was revised and consists of three upgradient monitoring wells (MW-39R, MW-40, and MW-62) and three downgradient monitoring wells (MW-41, MW-63, and MW-64).

During retrofit construction activities for the APH Pond during 2020 and 2021 per the federal CCR Rule, upgradient groundwater monitoring well MW-39 was apparently destroyed and could not be located during the April 2021 detection monitoring event. A replacement monitoring well (MW-39R) was installed during 2021 in close proximity to the location of former well MW-39 prior to the October 2021 semi-annual detection monitoring event and was monitored during that detection monitoring event.

2.2 Site Specific Information

Subsurface data from a soil boring recently installed as part of the current monitoring network at the nearby Emergency Pond (E-Pond) at the Station indicate that the subsurface geology beneath the W.A. Parish generating facility consists predominately of clays, silty clays with sandy clay, sandy silt, and sands and is consistent across the Station (ERM, Groundwater Monitoring networks, October 2017).

During the original installation of monitor wells for the W.A. Parish CCR monitoring networks, soil samples were not collected for Appendix III & IV CCR constituent analyses. In November 2024, monitor well MW-61R was installed at the E-Pond to replace MW-61 as part of the construction of a Zero Liquid Discharge (ZLD) wastewater treatment facility required under the Effluent Limitation Guidelines (ELG) for coal-fired power plants. During the installation of MW-61R, soil samples of native subsurface soils were collected on November 7, 2024, and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron, fluoride, sulfate and pH, which are the apparent SSIs for this 17th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4’ bgs	27-27’bgs
Boron	3.39 mg/kg	7.35 mg/Kg
Fluoride	5.49 mg/Kg	2.32 mg/Kg
Sulfate	57.3 mg/Kg	83.0 mg/Kg
pH	8.86	8.95

Based on the consistency of the subsurface soils at the APH Pond and the E-Pond, and the close proximity of the APH Pond to the E-Pond, the subsurface soil laboratory analytical results for the E-Pond are considered to be representative for both CCR Units. The laboratory analytical report was included as Appendix A of the 16th Semi-Annual Detection Monitoring ASD, dated July 26, 2025. As shown in the above table, the concentrations of boron and sulfate in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

2.3 Groundwater Geochemistry

Understanding the geochemistry of groundwater is essential to examining the groundwater monitoring data, explaining the relationships between the characteristics of the groundwater, and analyzing both natural and potential anthropogenic impacts on groundwater. Separate from potential source areas of contamination, geochemical processes are critical in controlling the chemical composition of groundwater, including carbonate equilibrium, oxidation-reduction reactions, and adsorption-desorption processes. Based on the hydrogeology of the APH Pond, boron, fluoride, and pH are discussed in the subsections below.

Therefore, separate from potential source areas of contamination, geochemical processes are critical in controlling the chemical composition of groundwater, including carbonate equilibrium, oxidation-reduction reactions, and adsorption-desorption processes and leaching of constituents from the soil into the groundwater.

2.3.1 Boron in Groundwater

Boron is normally considered to be a minor constituent in groundwater since it is generally present in low concentrations (Palmucci & Rusi, 2014). Apart from a potential boron source area, the primary origin of boron in groundwater is typically associated with the processes of sorption and desorption from mineral surfaces including soil and bedrock (Ravenscroft & McArthur, 2004). Boron is often cited as a contaminant trace chemical and usually occurs as a non-ionized form as H_3BO_3 in soils at pH <8.5, but above this pH, it exists as an anion, $B(OH)_4^-$ (Upadhyaya et al., 2014).

The factors that may influence the concentration of boron in groundwater include weathering, human activity, evaporative concentration, ion-exchange, electrical conductivity (EC), and pH. Ravenscroft & McArthur (2004) investigated the mechanism of regional boron enrichment in groundwater and the results indicated that the main process resulting in boron enrichment in groundwater was flushing by fresh groundwater. The desorption of boron from mineral surfaces could be affected by pH, ionic strength, salinity, and the HCO_3/CO_3 ratio. Decreases in pH will increase the dissolution of boron from the mineral surfaces. Boron adsorption favors high pH and boron desorption favors low pH in rocks, soils, and organic matters (Hollis et al., 1988; Keren & Communar, 2009; Tabelin et al., 2014).

Additional investigations confirmed that the presence of boron in groundwater depends on the EC (salinity), such that the concentration of boron increases with increasing EC. Halim et al. (2010) reported that the increae in Cl^- contributes to an increase in EC value since a strong linear correlation (R^2 = 0.88) between EC and Cl^- was observed. Palmucci & Rusi (2014) observed a clear correlation between elevated concentrations of boron and the chloride-sodium facies, which are characterized by high saline content, negative redox potential, and low value of the SO_4^{2-}/Cl^- ratio. Rodriguez-Espinosa et al. (2020) determined that the concentration of boron in groundwater was related to SO_4^{2-} and the age affect.

Regarding the concentration of boron in groundwater at the APH Pond, the source of boron is natural rather than anthropogenic. Therefore, the increase in concentration of boron is related to natural variations in groundwater geochemistry, such as pH, ion exchanges, EC, and salinity.

2.3.2 Sulfate in Groundwater

The presence of sulfate is ubiquitous in groundwater, having both natural and anthropogenic sources. There are many potential sources of sulfate in groundwater including mineral dissolution, atmospheric deposition, and other anthropogenic sources (mining, fertilizer, synthetic detergents, industrial wastewater etc.) (Miao et al., 2012). As groundwater moves through soil and rock formations that contain sulfate minerals, a portion of the sulfate dissolves into the groundwater. Minerals that contain sulfate include magnesium sulfate (Epsom salt), sodium sulfate (Glauber's salt), and calcium sulfate (gypsum). Gypsum is an important contributor to elevated concentrations of sulphate in groundwater aquifers. Elevated concentrations of sulfate in groundwater are common in the western part of the United States (MDH, 2008).

Sulfate is mobile in soil and can impact groundwater quality. Multiple investigations have indicated that atmospheric deposition, dissolution of gypsum, and oxidation of sulfide minerals can contribute to the concentrations of sulfate in groundwater.

Regarding the concentration of sulfate in groundwater at the APH Pond, the source of sulfate is more likely natural rather than anthropogenic. Therefore, the increase in concentration of sulfate is related to natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition (Einsiedl & Mayer, 2005; Pu et al., 2012).

2.3.3 Fluoride in Groundwater

The common natural source of fluoride in groundwater is the dissolution of natural fluoride-bearing minerals, such as fluorspar, fluorapatite, amphiboles, hornblende, tremolite, and biotite (Luo et al., 2018). The natural concentration of fluoride in groundwater depends on the geological, chemical, and physical characteristics of the aquifer, the porosity and acidity of the soils and rock, temperature, interaction with other chemical elements, depth of the aquifer, and intensity of weathering (Brindha & Elango, 2011). Reflecting the range in concentrations of fluoride in groundwater for the Station, it is likely that geochemical processes are the primary variable controlling the concentrations of fluoride in groundwater.

A range of natural and anthropogenic geochemical processes including Ion exchange, evaporation, adsorption-desorption, ion competition, mixing, and salinization can occur resulting in an increase in fluoride concentrations in groundwater (Luo et al., 2018). In particular, alkaline pH, elevated concentrations of sodium and bicarbonate, and decreased concentrations of calcium are geochemical variables.

Alkaline pH can increase the fluoride dissolution from mineral surfaces into groundwater. Saxena & Ahmed (2001) observed that alkaline conditions with pH ranging between 7.6 and 8.6 are favorable for dissolution of fluorite mineral from the host rocks.

Sodium bicarbonate-type waters are typical of high fluoride waters. Multiple investigations have demonstrated positive correlations between fluoride and both bicarbonate and sodium as well as an inverse relation between fluoride and calcium (Mondal et al., 2014; Guo et al., 2012; Chen et al., 2020). The chemical reactions for the dissolution of fluoride in the presence of high bicarbonate and sodium, and low calcium content is described as follows (Kimambo et al., 2019):

$$\mathrm{Na^{+} + \; +HCO_3^{-} - \rightarrow NaHCO_3}$$
$$\mathrm{CaF_2 + \; +2NaHCO_3 \; \rightarrow CaCO_3 + 2Na^{+} + 2F^{-} + \; H_2O + CO_2}$$

Luo et al. (2018) reported that cation exchange can increase the concentration of fluoride when increasing the Na/Ca molar ratio via ion complexation, and salt affect can further increase the fluoride dissolution from mineral surfaces.

In addition, evaporation is another potential reason that can result in an increased concentration of fluoride in shallow groundwater. Evaporation may directly remove water from shallow aquifers and result in an elevated fluoride concentration. Evaporation can increase ion concentrations, leading to the precipitation of some major minerals, reducing the calcium concentration, and favoring the dissolution of fluoride.

2.3.4 pH

The apparent pH SSIs appear to be related to natural variations in groundwater quality resulting in changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP) and are also related to changes in the measured concentrations of CCR constituents.

Section 3
Alternative Source Demonstration

The 17th semi-annual detection monitoring event was conducted on August 8, 2025, per 30 TAC Chapter 352. Statistical evaluation of the results (comparison of downgradient monitoring results to 95 percent confidence/95 percent coverage upper tolerance limits [UTLs]) was performed within 60 days of sample collection to identify apparent SSIs above background pursuant to 30 TAC 352, Subpart H. Four apparent SSIs were initially identified (fluoride, boron, sulfate, and pH).

As part of the ASD activities, verification sampling was conducted on September 5, 2025, for the initial four apparent SSIs. Four apparent SSIs were confirmed: fluoride, boron, sulfate, and pH. Based on the results of the verification sampling and statistical analysis, NRG notified TCEQ of its intent to prepare an ASD addressing the apparent SSIs for boron, fluoride and pH.

The UTLs and sampling results for the three apparent SSIs are provided in Table 1 below.

Table 1 SSIs – August 2025 Semi-Annual Detection Monitoring Event

ANALYTE	WELL	LTL	UTL	SAMPLE DATE	VALUE	UNIT
Boron	MW-39R	NA	0.23	09/05/2025	0.387	mg/L
Fluoride	MW-41	NA	0.20	09/05/2025	0.250	mg/L
pH	MW-41	6.4	6.9	09/05/2025	7.12	S.U.
Boron	MW-63	NA	0.23	09/05/2025	0.232	mg/L
Fluoride	MW-63	NA	0.20	09/05/2025	0.240	mg/L
Sulfate	MW-63	NA	360	09/05/2025	586	mg/L
Fluoride	MW-64	NA	0.20	09/05/2025	0.330	mg/L

Notes: mg/L = milligrams per Liter
S.U. = Standard Units

As discussed previously in subsection 1.1.1 of this ASD, during retrofit construction activities at the APH Pond during 2020 and 2021 per the federal CCR Rule, it appears that the geochemistry and hydrogeology of the uppermost aquifer were altered as follows:

- As a result of removal of water from the APH Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
- Excavation of all CCR and decontamination of the APH Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;

- Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
- As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and ORP, are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.

As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.

In addition, as discussed previously in subsection 2.2 of this ASD, on November 7, 2024 during installation of monitor well MW-61R at the E-Pond to replace MW-61 as part of the construction of a ZLD wastewater treatment facility, soil samples of native subsurface soils were collected and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron, fluoride, and pH, which are the apparent SSIs for this 17th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4’ bgs	27-27’bgs
Boron	3.39 mg/kg	7.35 mg/Kg
Fluoride	5.49 mg/Kg	2.32 mg/Kg
Sulfate	57.3 mg/Kg	83.0 mg/Kg
pH	8.86	8.95

Based on the consistency of the subsurface soils at the APH Pond and the E-Pond, and the close proximity of the APH Pond to the E-Pond, the subsurface soil laboratory analytical results for the E-Pond are considered to be representative for both CCR Units. As shown in the above table, the concentrations of boron and pH in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Section 4
Conclusions

Based on statistical evaluation of August 8, 2025, semi-annual detection monitoring event and the verification sampling, four apparent SSIs, fluoride, boron, sulfate, and pH were identified for the APH Pond. This ASD has identified the following lines of reasoning that support alternative sources for the apparent SSI:

- It appears that the construction activities that occurred during the retrofit of the APH Pond per the federal CCR Rule during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer as follows:
  - As a result of removal of water from the APH Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system;
  - Excavation of all CCR and decontamination of the APH Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system;
  - Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration; and
  - As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.
- As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.
- Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition; and
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Therefore, based on the lines of reasoning presented in this ASD, alternative sources other than a release from the retrofitted APH Pond have been shown to be responsible for the apparent SSIs observed. Based on preparation of this successful ASD, NRG will continue semi-annual detection monitoring for the APH Pond, and quarterly monitoring for MW-61R until eight quarterly background detection monitoring events for the Appendix III and IV CCR constituents have been performed per 30 TAC Chapter 352.

Section 5
References

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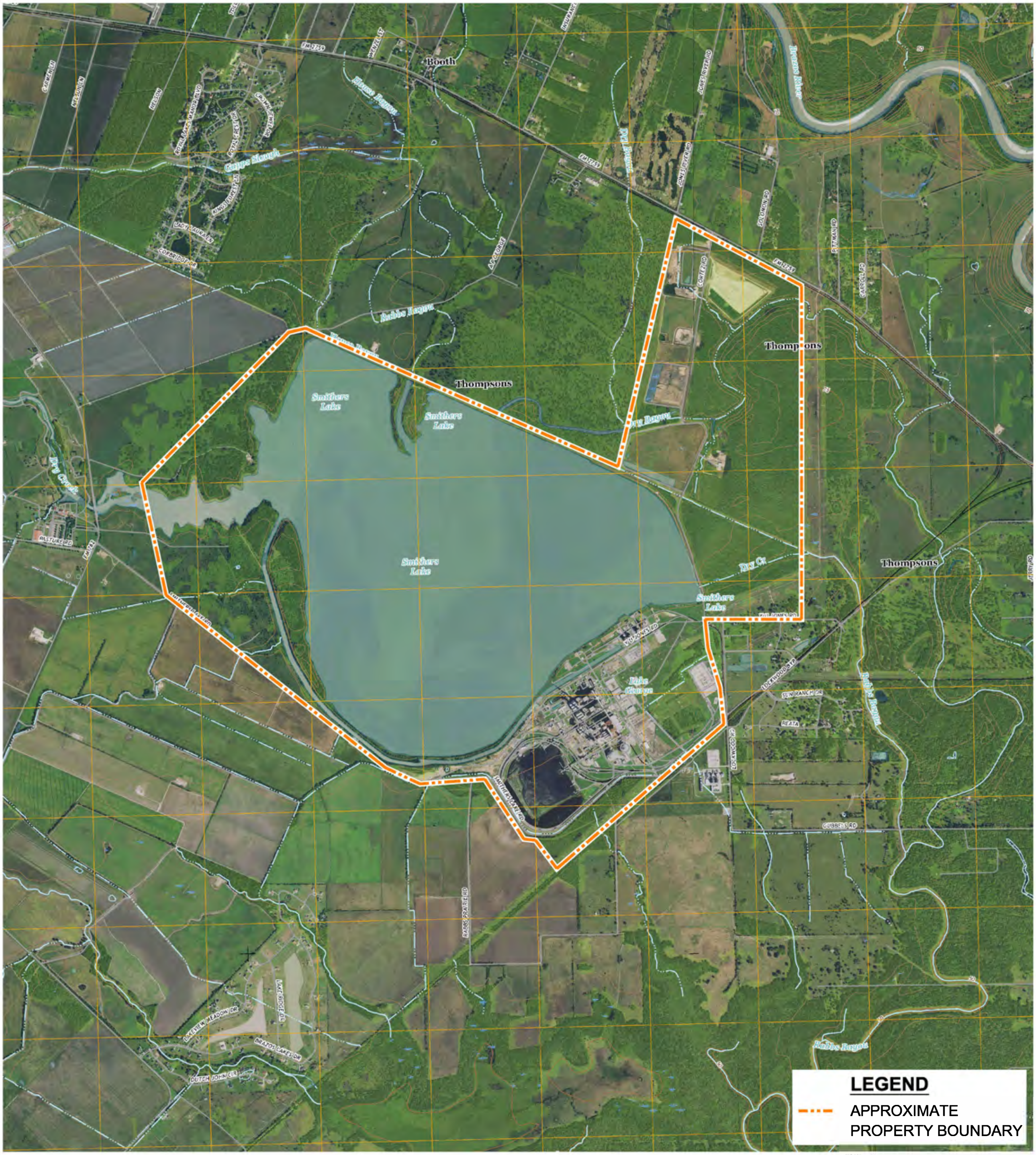
Figures



REFERENCE: U.S.G.S. 7.5 MINUTE TOPOGRAPHIC QUADRANGLES
MISSOURI CITY, TEXAS (2016) / SMITHERS LAKE, TEXAS (2016) / SUGAR LAND, TEXAS (2016) / THOMPSONS, TEXAS (2016)

TEXAS
QUADRANGLE LOCATION

N

0 2,000' 4,000' 8,000'

SCALE IN FEET
1" = 4,000'-0"

CLIENT / PROJECT

NRG TEXAS POWER, LLC
W.A. Parish Station
Thompsons, Texas

TITLE

SITE LOCATION MAP

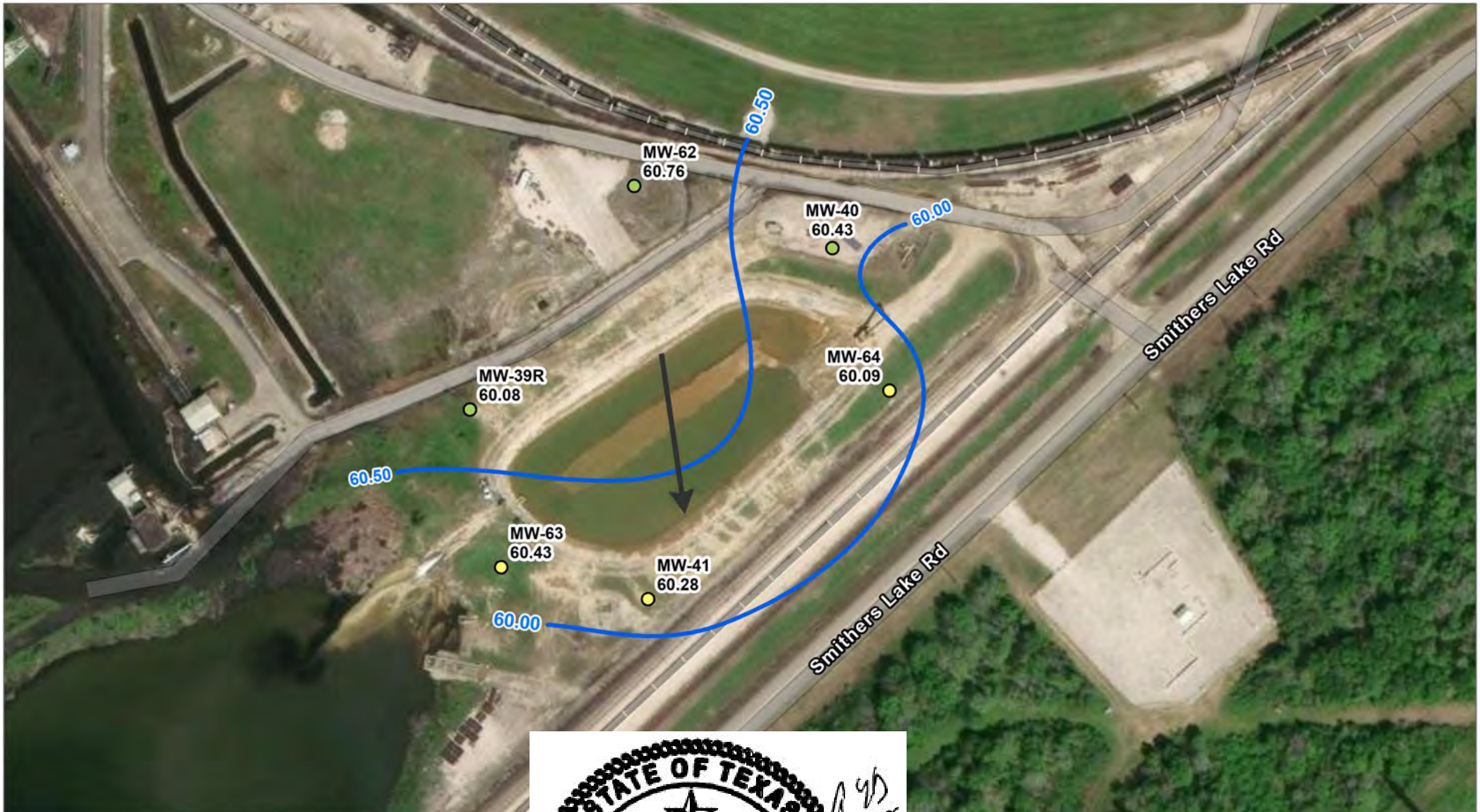
DRAWN BY: **O. Fonseka**	REQUEST BY: **J. Atwell**	PROJECT NO. **649506**
DWG. DATE: **January 2025**	PROJECT-MGR: **T. Dworaczyk**	

TRC
11767 KATY FREEWAY, SUITE 850
HOUSTON, TEXAS 77079
PHONE: 281-616-0100
TRCcompanies.com

FIGURE
1

LAST EDIT: 01/22/2025 - FILE LOCATION: HOU C:\OF-TRC\DRAFTING-CDrive\ECR-Files\NRG\W.A. Parish Station - Thompsons-TX\2025\ Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg

DRAWING By: Oskar Fonseka - FILE NAME: Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg



- MULTIUNIT UPGRADIENT MONITOR WELL
- MULTIUNIT DOWNGRADIENT MONITOR WELL
- GROUNDWATER FLOW DIRECTION
- GROUNDWATER ELEVATION CONTOUR (FT MSL)

STATE OF TEXAS
ANTHONY DWORACZYK
GEOLOGY
2658
LICENSED
PROFESSIONAL GEOSCIENTIST

12-17-25

PROJECT:	NRG TEXAS POWER, LLC W.A. PARISH STATION THOMPSONS, TEXAS
TITLE:	AIR PREHEATER POND GROUNDWATER POTENTRIOMETRIC SURFACE MAP AUGUST 2025
DRAWN BY:	M. BILLINGS
PROJ. NO.:	649506
CHECKED BY:	S. MOTURI
APPROVED BY:	J. ATWELL
DATE:	DECEMBER 2025
	FIGURE 2
FILE:	PARISHSTATION_TX_FIGURES

BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

NOTE: MW-39R WAS NOT USED FOR GROUNDWATER ELEVATION CONTOUR.

0 75 150 FEET
1:1,800 1" = 150'

TRC
11767 KATY FREEWAY
SUITE 850
HOUSTON, TX 77079
PHONE: 713.244.1000

COORDINATE SYSTEM: NAD 1983 2011 STATEPLANE TEXAS SOUTH CENTRAL FIPS 4204 FTUS; MAP ROTATION: 0
-- SAVED BY: MBILLINGS ON 12/18/2025, 16:14:58 PM; FILE PATH: T:\1-PROJECTS\NRG\649506_WA_PARISHSTATION_TEXAS\2-APRX\PARISHSTATION_TX_FIGURES.APRX; LAYOUT NAME: FIG2-8_AIRPREHEATERPOND_8.5X11L

11767 Katy Freeway, Suite 850 Houston, TX 77079
T 281.616.0100 TRCcompanies.com

December 22, 2025

Mr. Martin Torres
Section Manager
Industrial and Hazardous Waste Permits Section – MC-130
Texas Commission on Environmental Quality
PO Box 13087
Austin, Texas 78711-3087

Subject: CCR Alternate Source Demonstrations
NRG Texas W.A Parish Electric Generating Station Industrial Solid Waste Registration No. 31631
EPA Identification No. TXD097311849
RN10088312/CN603207218, CCR108

Transmitted via email CCRNotify@tceq.texas.gov

Dear Mr. Torres,

On behalf of NRG Texas, TRC is submitting enclosed the Alternate Source Demonstrations (ASDS) for the NRG W.A. Parish Electric Generating Station

NRG will continue to comply with the Texas Coal Combustion Residuals Program (CCR), Chapter 352 CCR Waste Management Rules. As always, NRG continues to be committed to working with the TCEQ and partner with the communities they serve; their common goal is the protectiveness of human health and the environment in the areas surrounding operations at their facilities.

Please do not hesitate to contact me via email at adworaczyk@trccompanies.com or phone at 832-904-1925 if you need additional information or wish to discuss this request. As always, we continue to be committed to working with the TCEQ and partner with the communities we serve; our common goal is the protectiveness of human health and the environment in the areas surrounding operations at our facilities.

Sincerely,

Tony Dworaczyk

Tony Dworaczyk, PG
Senior Project Manager
TRC

Cc: Craig Eckberg (NRG Director, Environmental Services
Carl Burch (NRG Environmental Manager)
Robert Been (NRG Sr. Environmental Specialist)

Texas Commission on Environmental Quality

Waste Permits Division Correspondence Cover Sheet

Date: December 22, 2025
Facility Name: NRG-WA Parish Generating Station
Permit or Registration No.: CCR108

Nature of Correspondence:
☒ Initial/New
☐ Response/Revision to TCEQ Tracking No.: ______ (from subject line of TCEQ letter regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Notifications
☐ New Notice of Intent	☐ Alternative Daily Cover Report
☐ Notice of Intent Revision	☐ Closure Report
☐ New Permit (including Subchapter T)	☐ Compost Report
☐ New Registration (including Subchapter T)	☒ Groundwater Alternate Source Demonstration
☐ Major Amendment	☐ Groundwater Corrective Action
☐ Minor Amendment	☐ Groundwater Monitoring Report
☐ Limited Scope Major Amendment	☐ Groundwater Background Evaluation
☐ Notice Modification	☐ Landfill Gas Corrective Action
☐ Non-Notice Modification	☐ Landfill Gas Monitoring
☐ Transfer/Name Change Modification	☐ Liner Evaluation Report
☐ Temporary Authorization	☐ Soil Boring Plan
☐ Voluntary Revocation	☐ Special Waste Request
☐ Subchapter T Disturbance Non-Enclosed Structure	☐ Other:
☐ Other:	

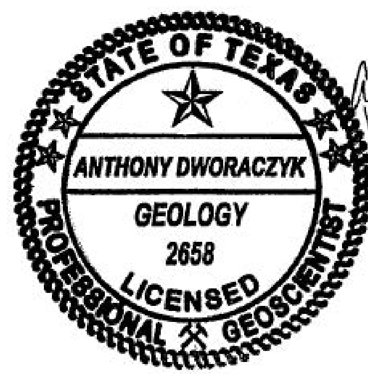
Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
☐ New	☐ Annual/Biennial Site Activity Report
☐ Renewal	☐ CPT Plan/Result
☐ Post-Closure Order	☐ Closure Certification/Report
☐ Major Amendment	☐ Construction Certification/Report
☐ Minor Amendment	☐ CPT Plan/Result
☐ CCR Registration	☐ Extension Request
☐ CCR Registration Major Amendment	☐ Groundwater Monitoring Report
☐ CCR Registration Minor Amendment	☐ Interim Status Change
☐ Class 3 Modification	☐ Interim Status Closure Plan
☐ Class 2 Modification	☐ Soil Core Monitoring Report
☐ Class 1 ED Modification	☐ Treatability Study
☐ Class 1 Modification	☐ Trial Burn Plan/Result
☐ Endorsement	☐ Unsaturated Zone Monitoring Report
☐ Temporary Authorization	☐ Waste Minimization Report
☐ Voluntary Revocation	☐ Other:
☐ 335.6 Notification	
☐ Other:	

I hereby certify that the alternative source demonstration presented within this document for the NRG WA Parish Coal Ash Disposal Landfill CCR Unit has been prepared to meet the requirements of 30 TAC 352.4; 352.941(c); and 352.1321. This document is accurate and has been prepared in accordance with good geosciences practices, including the consideration of applicable industry standards, and with the requirements of 30 TAC 352.4; 352.941(c); and 352.1321.

Name: Tony Dworaczyk **Expiration Date:** 1/30/2026

Company: TRC Environmental Corporation **Date:** 12/17/2025



12-17-25

Alternative Source Demonstration

W.A. Parish Electric Generating Station
FGD Emergency Pond (SWMU 020)

December 2025

Prepared For
NRG Texas Power, LLC
Thompsons, Texas
TCEQ Coal Combustion Residuals (CCR) Registration No. CCR108
Industrial Solid Waste Registration No. 31631
EPA Identification No. TXD097311849

Gregory E. Tieman
Senior Client Services Manager

Tony Dworaczyk, P.G.
Geologist/Project Manager

TRC Environmental Corporation | NRG Texas Power, LLC
Alternate Source Demonstration, W.A. Parish, FGD Emergency Pond (SWMU 020)

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Executive Summary

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas. Units managing coal combustion residuals (CCR) at the Station are subject to the requirements of 30 Texas Administrative Code (TAC) Chapter 352. CCR generated at the Station consists of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge. The Site has three active CCR management units that are subject to regulation under 30 TAC Chapter 32, including the FGD Emergency Pond (E-Pond), which is the subject of this Alternate Source Demonstration (ASD).

The 17th semi-annual groundwater detection monitoring event was conducted on August 8, 2025. Verification sampling was performed on September 5, 2025. Statistical evaluation of the results was performed to identify apparent statistically significant increases (SSIs) above background pursuant to 30 TAC 352 Subpart H. Boron, sulfate, and total dissolved solids (TDS) were initially identified as apparent SSIs for the August 8, 2025 sampling event at three monitoring wells (MW-37, MW-38R, and MW-61R). NRG notified the Texas Commission Environmental Quality (TCEQ) of its intent to prepare an ASD.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the second half of 2019 (July) through the first half of 2021 (April). The August 8, 2025 semi-annual detection monitoring event analytical results, including September 5, 2025 verification sampling results are the ninth data set statistically evaluated using the new background water quality data set.

This ASD has identified alternative sources for apparent SSIs at the E-Pond, based on the following lines of reasoning:

- The bottom of the E-Pond clay liner is separated from the upper aquifer system by a confining unit that hydraulically isolates the bottom of the E-Pond from the upper aquifer system. Improperly installed or damaged monitoring wells may have historically provided a conduit for CCR constituents to migrate into the upper aquifer system.
- The former, historical presence of CCR materials in the vicinity of the monitoring wells prior to their modification to include risers from the ground surface provided an opportunity for surface materials to inadvertently enter the wells directly from the ground surface.
- Water quality improved incrementally with each improvement to the CCR groundwater monitoring network over time. In July 2019, MW-38 was severely damaged by mobile plant equipment. MW-38 was abandoned and MW-38R was installed adjacent to the former location of MW-38. Analytical data for August 2019 for MW-38R indicates significantly improved overall groundwater quality data.

- It appears that the construction activities that occurred during the retrofit of the E-Pond per the federal CCR Rule and the Closure Plan during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer as follows:
  - As a result of removal of water from the E-Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system.
  - Excavation of all CCR and decontamination of the E-Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system.
  - Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration.
  - As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.
- As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.
- Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition; and
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Therefore, based on the lines of reasoning presented in this ASD, alternative sources other than a release from the E-Pond have been shown to be responsible for each of the three apparent SSIs observed. Based on this successful ASD, NRG will continue performing semi-annual detection monitoring for the E-Pond per 30 TAC Chapter 352.

Section 1
Introduction

1.1 Background

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas, adjacent to Smithers Lake. The electricity generating portion of the Station, or the main Plant Operations Area (Plant Area), is located along the southeastern shore of the lake.

Management of coal combustion residuals (CCR) at the Station is performed pursuant to 30 Texas Administrative Code (TAC) Chapter 352, which became effective during June 2021. Prior to this, management of CCR was performed pursuant to the United States Environmental Protection Agency (USEPA) final rule for the regulation and management of CCR under the Resource Conservation and Recovery Act (RCRA) Title 40, Code of Federal Regulations, Part 257 (40 CFR §257) (CCR Rule, effective date October 19, 2015).

CCR generated at the Station consist of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge, which have been classified by the TCEQ as Class II nonhazardous waste. The Station has the following three active CCR-management units:

- Solid Waste Disposal Area (SWDA) (SWMU 001), which consists of four active CCR-management cells: Cell 1C, Cell 2A-Pug Mill, Cell 2B, and Cell 3 and is now monitored as a single CCR Multiunit.
- Air Preheater Pond (APH Pond, SWMU 021).
- FGD Emergency Pond (E-Pond, SWMU 020).

The E-Pond receives storm water runoff from the FGD dewatering area and blowdown from the FGD system. The E-Pond may also receive the contents of an FGD process vessel when the FGD system is not in operation.

1.1.1 Retrofit Construction Activities

During 2020 and 2021, the E-Pond was removed from service and retrofitted per §257.102(k) of the federal CCR Rule. As part of these activities, the CCR within the impoundment was dewatered, all water and CCR was removed from the impoundment, and the E-Pond area was decontaminated based on over-excavating a minimum of 6-inches of clay liner material after removal of CCR. After CCR removal and decontamination had been confirmed, a federal CCR Rule bottom composite liner system was then installed, and the E-Pond was placed back into service as a CCR unit compliant with both the federal and TCEQ CCR programs.

During retrofit construction activities, it appears that the geochemistry and hydrogeology of the uppermost aquifer were altered as follows:

- As a result of removal of water from the E-Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system.
- Excavation of all CCR and decontamination of the E-Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system.
- Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration.
- As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.

As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.

1.1.2 Groundwater Monitoring Program

On behalf of NRG, Environmental Resources Management, Inc. (ERM) conducted eight independent background groundwater detection monitoring events for both the Appendix III and IV CCR constituents between April 2015 and August 2017 per §257.94(b) of the federal CCR Rule and the first semi-annual detection monitoring event in October 2017. Results of the eight background and first semi-annual detection monitoring events for the E-Pond were documented in the *Annual Groundwater Monitoring Report, FGD Emergency Pond (Unit 020)* (ERM 2018a) and the March 1, 2018, *Groundwater Monitoring Report, FGD Emergency Pond (SWMU Unit 020)* (ERM 2018b) pursuant to §257.90(e).

The Station has continued to conduct semi-annual detection monitoring at the E-Pond per the federal CCR Rule and 30 TAC Chapter 352. As of August 8, 2025 sampling event and verification sampling on September 5, 2025 a total of 17 semi-annual detection monitoring events have now been performed. Following each semi-annual detection monitoring sampling event, the results have been evaluated for potential SSIs, and ASDs have been prepared as needed. Since implementation of 30 TAC Chapter 352, the ASDs have been submitted to TCEQ for review and approval. The semi-annual detection monitoring activities and ASDs have been included in the Annual Groundwater Monitoring and Corrective Action reports, which have been placed into the Facility Operating Record (FOR) and posted to NRG's publicly accessible website.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the third half of 2019 (July) through the first half of 2021 (April). The August 8, 2025 semi-annual detection monitoring event and September 5, 2025 verification sampling analytical results are the ninth data set statistically evaluated using the new background water quality data set.

Since initial installation of the CCR groundwater monitoring network for the E-Pond, improvements to the network have been implemented to improve the operation of the network. These improvements are identified below:

- During the second semi-annual detection monitoring event, surface CCR may have been inadvertently introduced into the monitoring wells and the laboratory analytical sample containers during the initial background and semi-annual detection monitoring events. To mitigate this potential issue, the flush-mounted monitoring wells at the E-Pond were modified before the third semi-annual detection monitoring event was performed with the installation of vertical well casing extensions and protective casings.
- During the third semi-annual detection monitoring event, silt was observed in the monitoring wells at the E-Pond. The wells were redeveloped, and accumulated silt was removed from the well casings prior to performance of the fourth semi-annual detection monitoring event.
- In July 2019, MW-38 was severely damaged by mobile plant equipment. MW-38 was abandoned and MW-38R was installed adjacent to the location of former MW-38.

1.2 Purpose

TRC prepared this ASD on behalf of NRG to evaluate apparent SSIs above background levels for the 17th semi-annual detection monitoring event in accordance with 30 TAC Chapter 352.

Section 2
Site Geology and Hydrogeology

This section provides information about the geology and hydrogeology of the Station and the area at and surrounding the E-Pond.

2.1 Hydrogeology

Based on the *Geologic Atlas of Texas, Houston Sheet* (BEG 1982), the Station is underlain by alluvium and the Beaumont formation (also commonly referred to as the Beaumont Clay). The alluvium is present along the Brazos River, which is located approximately 0.9 miles from the northern boundary of the SWDA CCR units. Both the alluvium and the Beaumont formation are composed of clay, silt, and sand; and may include stream channel, point-bar, natural levee, back swamp, coastal marsh, and mud-flat deposits. The thickness of the Beaumont formation is approximately 100 feet. The alluvium is not present at the Plant Area which is consistent with this area being located outside of the Brazos River floodplain zone (FBC 2018). The APH Pond and the E-Pond are both located at the Plant Area.

The alluvium and the Beaumont Formation are located within the upper unit of the Chicot aquifer system. At most locations throughout Fort Bend County, the Chicot aquifer system is under confined conditions (TWDB 1990). The Chicot aquifer system is primarily recharged by precipitation at locations where it outcrops in Austin, Harris, and Waller Counties; groundwater then flows laterally within Fort Bend County (TWDB 1990). Site investigations performed by others on behalf of NRG also indicate that the uppermost groundwater-bearing units at the Site are under confined conditions (ERM 2017a).

Environmental site investigations conducted in May 2016 and November 2016 identified three main subsurface strata at the Station, which were designated as Stratum DA-1 through DA-3 at the SWDA and Stratum PA-1 through PA-3 at the Plant Area (APH Pond and E-Pond). The strata are fully described in the October 2017 *CCR Groundwater Monitoring Networks* report (ERM 2017b) and are summarized below.

2.1.1 Stratum PA-1 (Upper Confining Unit)

Stratum PA-1 is predominately silty clay with some sandy clay, clay, and sandy silt. Stratum PA-1 is present from the ground surface to depths ranging from 15 feet bgs to 32 feet bgs.

Stratum PA-1 serves as a confining unit to underlying Stratum PA-2, which comprises the uppermost groundwater-bearing unit at the APH Pond and E-Pond. Geotechnical laboratory testing indicates that the hydraulic conductivity of Stratum PA-1 is 2.03E-08 centimeters per second (cm/sec) (ERM 2017b).

2.1.2 Stratum PA-2 (Upper Aquifer)

Stratum PA-2 is predominantly silty sand with varying sand and silt content and trace clay. Stratum PA-2 is generally greater than 10 feet in thickness with bottom depths ranging from 60 to 80 feet bgs.

Stratum PA-2 is saturated and comprises the uppermost groundwater-bearing unit at the APH Pond and E-Pond. CCR monitoring wells in the Plant Area are completed within Stratum PA-2. Slug testing results for CCR monitoring wells indicate hydraulic conductivity ranges from 6.68E-04 cm/sec to 4.26E-02 cm/sec in Stratum PA-2 (ERM 2017b). Groundwater primarily flows to the southwest beneath the E-Pond, and to the southeast beneath the APH Pond.

2.1.3 Stratum PA-3 (Lower Confining Unit)

Stratum PA-3 is predominantly clay to silty clay. This stratum appears to be the bottom confining layer to the overlying groundwater-bearing units (Stratum PA-2). The thicknesses of Stratum PA-3 has not been defined.

2.1.4 E-Pond – Certified Monitoring Network

The certified CCR groundwater monitoring well network for the E-Pond consists of five groundwater monitoring wells:

- Upgradient monitoring wells MW-36 and MW-60; and
- Downgradient monitoring wells MW-37, MW-38R, and MW-61R.

The wells were completed into Stratum PA-2. A groundwater potentiometric surface map was prepared by TRC for the August 8, 2025 semi-annual detection monitoring event and is provided in this ASD as Figure 2. Historically, groundwater flows to the southwest beneath the E-Pond at a gradient ranging from 0.010 feet per foot (ft/ft) to 0.030 ft/ft.

2.2 Site Specific Information

Subsurface data from a soil boring recently installed as part of the current monitoring network at the nearby Emergency Pond (E-Pond) at the Station indicate that the subsurface geology beneath the W.A. Parish generating facility consists predominately of clays, silty clays with sandy clay, sandy silt, and sands and is consistent across the Station (ERM, Groundwater Monitoring networks, October 2017).

During the original installation of monitor wells for the W.A. Parish CCR monitoring networks, soil samples were not collected for Appendix III & IV CCR constituent analyses. In November 2024, monitor well MW-61R was installed at the E-Pond to replace MW-61 as part of the construction of a Zero Liquid Discharge (ZLD) wastewater treatment facility required under the Effluent Limitation Guidelines (ELG) for coal-fired power plants. During the installation of MW-61R, soil samples of native subsurface soils were collected on November 7, 2024, and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron and sulfate, which are the apparent SSIs for this 17th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4' bgs	27-27'bgs
Boron	3.39 mg/kg	7.35 mg/Kg
Sulfate	57.3 mg/Kg	83.0 mg/Kg

The laboratory analytical report for these analyses was provided as Appendix A of the prior ASD for the E-Pond, dated July 26, 2025. As shown in the above table, the concentrations of boron and sulfate in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

2.3 Groundwater Geochemistry

Understanding the geochemistry of groundwater is essential to examining the groundwater monitoring data, explaining the relationships between the characteristics of the groundwater, and analyzing both natural and potential anthropogenic impacts on groundwater. Separate from potential source areas of contamination, geochemical processes are critical in controlling the chemical composition of groundwater, including carbonate equilibrium, oxidation-reduction reactions, and adsorption-desorption processes. Based on the hydrogeology of the E-Pond, potential SSIs in groundwater including boron, calcium, sulfate, and total dissolved solids (TDS) are discussed in the subsections below.

2.3.1 Boron in Groundwater

Boron is normally considered to be a minor constituent in groundwater since it is generally present in low concentrations (Palmucci & Rusi, 2014). Apart from a potential boron source area, the primary origin of boron in groundwater is typically associated with the processes of sorption and desorption from mineral surfaces including soil and bedrock (Ravenscroft & McArthur, 2004). Boron is often cited as a contaminant trace chemical and usually occurs as a non-ionized form as H_3BO_3 in soils at pH <8.5, but above this pH, it exists as an anion, $B(OH)_4^-$ (Upadhyaya et al., 2014).

The factors that may influence the concentration of boron in groundwater include weathering, human activity, evaporative concentration, ion-exchange, electrical conductivity (EC), and pH. Ravenscroft & McArthur (2004) investigated the mechanism of regional boron enrichment in groundwater and the results indicated that the main process resulting in boron enrichment in groundwater was flushing by fresh groundwater. The desorption of boron from mineral surfaces could be affected by pH, ionic strength, salinity, and the HCO_3/CO_3 ratio. Decreases in pH will increase the dissolution of boron from the mineral surfaces. Boron adsorption favors high pH and boron desorption favors low pH in rocks, soils, and organic matters (Hollis et al., 1988; Keren & Communar, 2009; Tabelin et al., 2014).

Additional investigations confirmed that the presence of boron in groundwater depends on the EC (salinity), such that the concentration of boron increases with increasing EC. Halim et al. (2010) reported that the increae in Cl^- contributes to an increase in EC value since a strong linear correlation ($R^2 = 0.88$) between EC and Cl^- was observed. Palmucci & Rusi (2014) observed a clear correlation between elevated concentrations of boron and the chloride-sodium facies, which are characterized by high saline content, negative redox potential, and low value of the SO_4^{2-}/Cl^- ratio. Rodriguez-Espinosa et al. (2020) determined that the concentration of boron in groundwater was related to SO_4^{2-} and the age affect.

Regarding the concentration of boron in groundwater at the E-Pond, the source of boron is natural rather than anthropogenic. Therefore, the increase in concentration of boron is related to natural variations in groundwater geochemistry, such as pH, ion exchanges, EC, and salinity.

2.3.2 Sulfate in Groundwater

The presence of sulfate is ubiquitous in groundwater, having both natural and anthropogenic sources. There are many potential sources of sulfate in groundwater including mineral dissolution, atmospheric deposition, and other anthropogenic sources (mining, fertilizer, synthetic detergents, industrial wastewater etc.) (Miao et al., 2012). As groundwater moves through soil and rock formations that contain sulfate minerals, a portion of the sulfate dissolves into the groundwater. Minerals that contain sulfate include magnesium sulfate (Epsom salt), sodium sulfate (Glauber's salt), and calcium sulfate (gypsum). Gypsum is an important contributor to elevated concentrations of sulphate in groundwater aquifers. Elevated concentrations of sulfate in groundwater are common in the western part of the United States (MDH, 2008).

Sulfate is mobile in soil and can impact groundwater quality. Multiple investigations have indicated that atmospheric deposition, dissolution of gypsum, and oxidation of sulfide minerals can contribute to the concentrations of sulfate in groundwater.

Regarding the concentration of sulfate in groundwater at the E-Pond, the source of sulfate is natural rather than anthropogenic. Therefore, the increase in concentration of sulfate are related to natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition (Einsiedl & Mayer, 2005; Pu et al., 2012).

2.3.3 TDS

Total dissolved solids (TDS) represent the combined total of inorganic and organic substances present in groundwater, and TDS can be a general indicator of water quality. These solids typically consist of minerals, salts, and organic matter, which may originate from sources such as weathering of minerals, storm water runoff, sewage, effluent discharges, agriculture, decaying organisms, and anthropogenic sources. Common salts that contribute to TDS are sodium, chloride, calcium, magnesium, potassium, sulfate, and bicarbonate. (Olumuyiwa I. Ojo, 2012)

TDS concentrations in groundwater is usually higher than surface water due to the longer contact time for groundwater with underlying soil and rocks. Since many minerals are water soluble, high concentrations can accumulate over time through the processes of precipitation and evaporation.

TDS is related to other water quality parameters such as hardness, which may occur if an elevated concentration of TDS is associated with the presence of carbonates. Research investigations have evaluated the relationship between TDS and other groundwater parameters such as EC and salinity (Atekwana et al., 2004; Banadkooki et al., 2020; Poursaeid et al., 2020).

Section 3
Alternative Source Demonstration

The 17th semi-annual detection monitoring event was conducted on August 8, 2025, per 30 TAC Chapter 352. Statistical evaluation of the results (comparison of downgradient monitoring results to 95 percent confidence/95 percent coverage upper tolerance limits [UTLs]) was performed within 60 days of sample collection to identify apparent SSIs above background pursuant to 30 TAC 352 Subpart H. Seven apparent SSIs were initially identified.

As part of the ASD activities, verification sampling was conducted on September 5, 2025, for the initial three apparent SSIs. Three apparent SSIs were confirmed for boron, sulfate, and TDS for three downgradient monitoring wells (MW-37, MW-38R, and MW-61R). Based on the results of the sampling event and statistical analysis, NRG notified the TCEQ of its intent to prepare an ASD addressing the apparent SSIs for boron, calcium, sulfate, and TDS.

The UTLs and sampling results for the seven apparent SSIs are provided in Table 1 below.

Table 1 SSI – August 2025 Semi-annual Detection Monitoring Event

ANALYTE	WELL	LTL	UTL	SAMPLE DATE	VALUE	UNIT
Boron	MW-37	NA	0.116	09/05/2025	0.481	mg/L
Sulfate	MW-37	NA	474	09/05/2025	1,300	mg/L
TDS	MW-37	NA	1,826	09/05/2025	2,960	mg/L
Boron	MW-38R	NA	0.116	09/05/2025	0.390	mg/L
Sulfate	MW-38R	NA	474	09/05/2025	715	mg/L
Sulfate	MW-61R	NA	474	09/05/2025	659	mg/L
TDS	MW-61R	NA	1,826	09/05/2025	1,940	mg/L

Notes: mg/L = milligrams per Liter
TDS = Total Dissolved Solids

As discussed previously in subsection 1.1.1 of this ASD, during retrofit construction activities at the E-Pond during 2020 and 2021 per the federal CCR Rule, it appears that the geochemistry and hydrogeology of the uppermost aquifer were altered as follows:

- As a result of removal of water from the E-Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system.
- Excavation of all CCR and decontamination of the E-Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system.

- Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration.
- As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and ORP, are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.

As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.

In addition, based on site-specific hydrogeology at the E-Pond, the following lines of reasoning have been identified that support alternative source(s) for the apparent SSIs:

- The bottom of the E-Pond is separated from the upper aquifer system by a confining unit (Stratum PA-1) that hydraulically isolates the bottom of the E-Pond from the upper aquifer system (Stratum PA-2). Available data indicate the upper aquifer system is under confined conditions and the confining unit (Stratum PA-1) acts as a vertical hydraulic barrier between the bottom of the E-Pond and the upper aquifer system (Stratum PA-2), based on the following lines of reasoning:
    - Based on review of the boring logs for the groundwater monitoring wells installed at the E-Pond, the upper clay confining unit (Stratum PA-1) was present at each monitoring well from the ground surface to depths ranging from 19 feet bgs to 32 feet bgs [i.e., thickness ranging from 19 feet to 32 feet; corresponding to elevations of about 53 to 49 feet above mean sea level (amsl)]. The bottom of the E-Pond is located within Stratum PA-1 with the bottom of the clay liner at an elevation of about 60 feet amsl); therefore, Stratum PA-1 acts as a confining layer between the bottom of the E-Pond and the underlying upper aquifer system (Stratum PA-2); and
    - Based on geotechnical laboratory results for a soil sample collected from Stratum PA-1 at a depth of 10 feet bgs, Stratum PA-1 is a lean clay with a hydraulic conductivity of 2.03E-8 centimeters per second (ERM 2017b), which is consistent with an impervious lithologic unit that exceeds the required specifications per 40 CFR §257.71(a) for a compacted bottom clay liner for a CCR impoundment.
- The E-Pond is located at an active power generating area at the Plant Area and non CCR-related and CCR-related materials are actively managed near the E-Pond. For example, the FGD loadout pad immediately adjoins the E-Pond. The presence of non CCR-related and CCR-related materials near the E-Pond monitoring wells may be a potential source for some or all of the apparent SSIs identified in groundwater samples collected from wells located downgradient of the E-Pond, as described further below. The E-Pond monitoring wells were originally installed as flush-mounted wells, which may have enabled surface materials to incidentally enter the groundwater monitoring wells during sampling activities.
- Prior to the third semiannual detection monitoring event, NRG modified the monitoring wells by installing casing extensions and protective casings to protect the wells from the accidental introduction of CCR materials directly into groundwater samples during sample collection. The wells

were further redeveloped prior to the fourth sampling event. Although the wells have been improved and sampling collection methods modified, groundwater/groundwater samples may still be affected by the prior, historical inadvertent introduction of surface CCR into the monitoring wells and/or groundwater samples during sample collection. This may include residual impacts from CCR introduced into the wells prior to their improvement in 2018.

Finally, as discussed previously in subsection 2.2 of this ASD, on November 7, 2024, during installation of monitor well MW-61R at the E-Pond to replace MW-61 as part of the construction of a ZLD wastewater treatment facility, soil samples of native subsurface soils were collected and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron, calcium, and sulfate, which are the apparent SSIs for this 16th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4' bgs	27-27'bgs
Boron	3.39 mg/kg	7.35 mg/Kg
Sulfate	57.3 mg/Kg	83.0 mg/Kg

As shown in the above table, the concentrations of boron and sulfate in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Section 4
Conclusions

Based on statistical evaluation of August 8, 2025, semi-annual detection monitoring event and September 5, 2025, verification sampling events analytical results, boron, sulfate, and TDS were identified as apparent SSIs for three downgradient monitoring wells (MW-37, MW-38R, and MW-61R) for the 17th semi-annual detection monitoring event. This ASD has identified the following lines of reasoning that support alternative sources for these apparent SSIs:

- The bottom of the E-Pond clay liner is separated from the upper aquifer system by a confining unit that hydraulically isolates the bottom of the E-Pond from the upper aquifer system. Improperly installed or damaged monitoring wells may have historically provided a conduit for CCR constituents to migrate into the upper aquifer system.
- The former, historical presence of CCR materials in the vicinity of the monitoring wells prior to their modification to include risers from the ground surface provided an opportunity for surface materials to inadvertently enter the wells directly from the ground surface.
- Water quality improved incrementally with each improvement to the CCR groundwater monitoring network over time. In July 2019, MW-38 was severely damaged by mobile plant equipment. MW-38 was abandoned and MW-38R was installed adjacent to the former location of MW-38. Analytical date for August 2019 for MW-38R indicates significantly improved overall groundwater quality data.
- It appears that the construction activities that occurred during the retrofit of the E-Pond per the federal CCR Rule and the Closure Plan during 2020 and 2021 altered the geochemistry and hydrogeology of the uppermost aquifer as follows:
  - As a result of removal of water from the E-Pond during CCR dewatering and retrofit construction, hydraulic loading stopped being a driver for the potential migration of CCR constituents into the uppermost aquifer system.
  - Excavation of all CCR and decontamination of the E-Pond area removed CCR as a potential source area for the migration of CCR constituents into the uppermost aquifer system.
  - Installation of the bottom composite liner system minimizes the potential for the migration of CCR constituents into the uppermost aquifer system by acting as a barrier to any such potential migration.
  - As a result of the retrofit construction activities summarized above, changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP), are anticipated to have occurred which will also be related to changes in the measured concentrations of CCR constituents.
- As the geochemistry and hydrogeology of the aquifer continues to evolve towards a new equilibrium following completion of the retrofit construction activities, it is anticipated that aquifer geochemistry will continue to re-equilibrate, which should be reflected in a continued evolution in the concentrations of CCR indicator parameters.

- Natural variations in groundwater geochemistry associated with mineral dissolution and/or atmospheric deposition.
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Therefore, based on the lines of reasoning presented in this ASD, alternative sources other than a release from the E-Pond have been shown to be responsible for each of the three apparent SSIs observed. Based on this successful ASD, NRG will continue performing semi-annual detection monitoring for the E-Pond per 30 TAC Chapter 352.

Section 5
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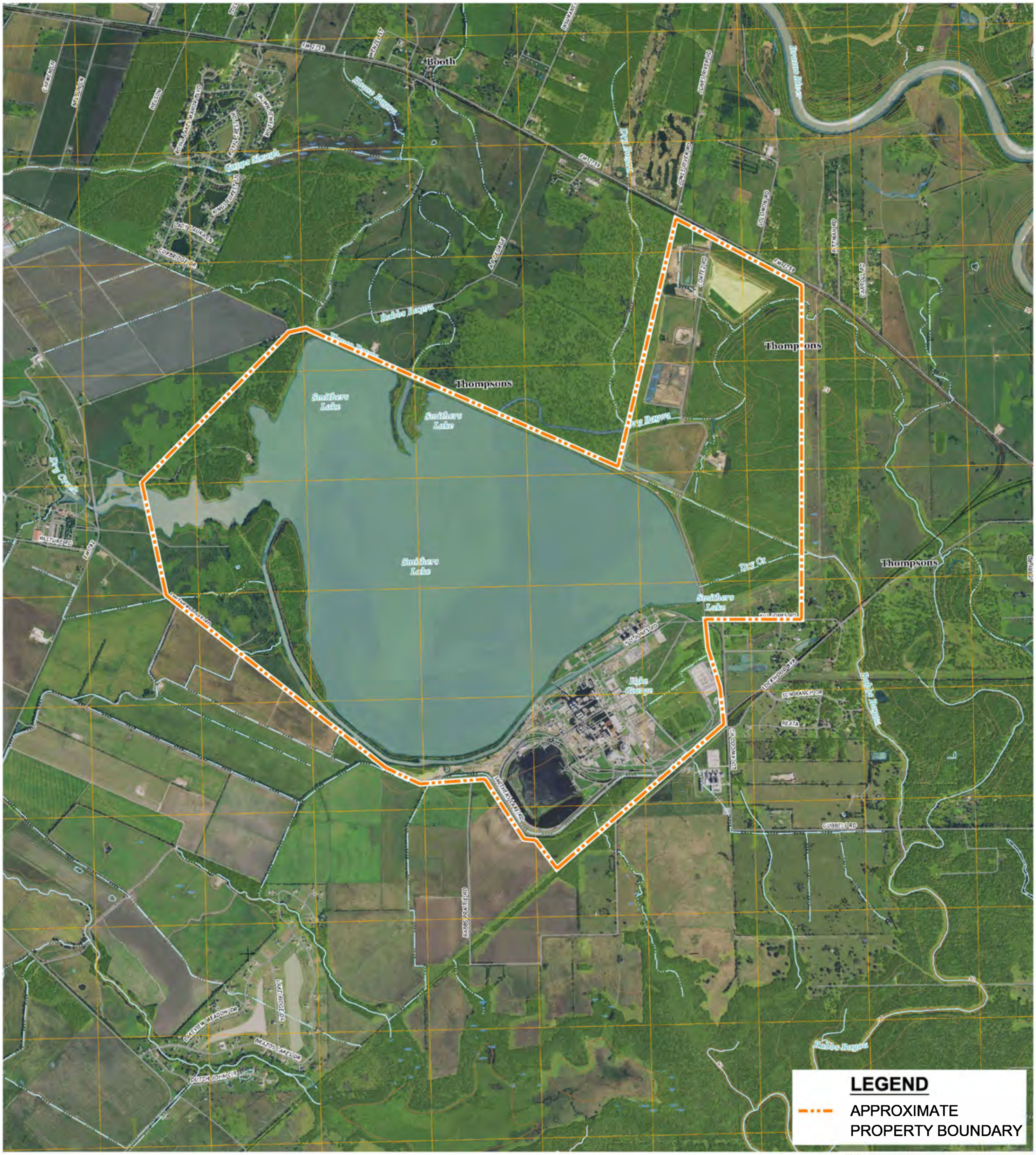
Figures

Figures



REFERENCE: U.S.G.S. 7.5 MINUTE TOPOGRAPHIC QUADRANGLES
MISSOURI CITY, TEXAS (2016) / SMITHERS LAKE, TEXAS (2016) / SUGAR LAND, TEXAS (2016) / THOMPSONS, TEXAS (2016)

TEXAS
QUADRANGLE LOCATION

0 2,000' 4,000' 8,000'

SCALE IN FEET
1" = 4,000'-0"

CLIENT / PROJECT

NRG TEXAS POWER, LLC
W.A. Parish Station
Thompsons, Texas

TITLE

SITE LOCATION MAP

DRAWN BY: **O. Fonseka**	REQUEST BY: **J. Atwell**	PROJECT NO. **649506**
DWG. DATE: **January 2025**	PROJECT-MGR: **T. Dworaczyk**	

TRC
11767 KATY FREEWAY, SUITE 850
HOUSTON, TEXAS 77079
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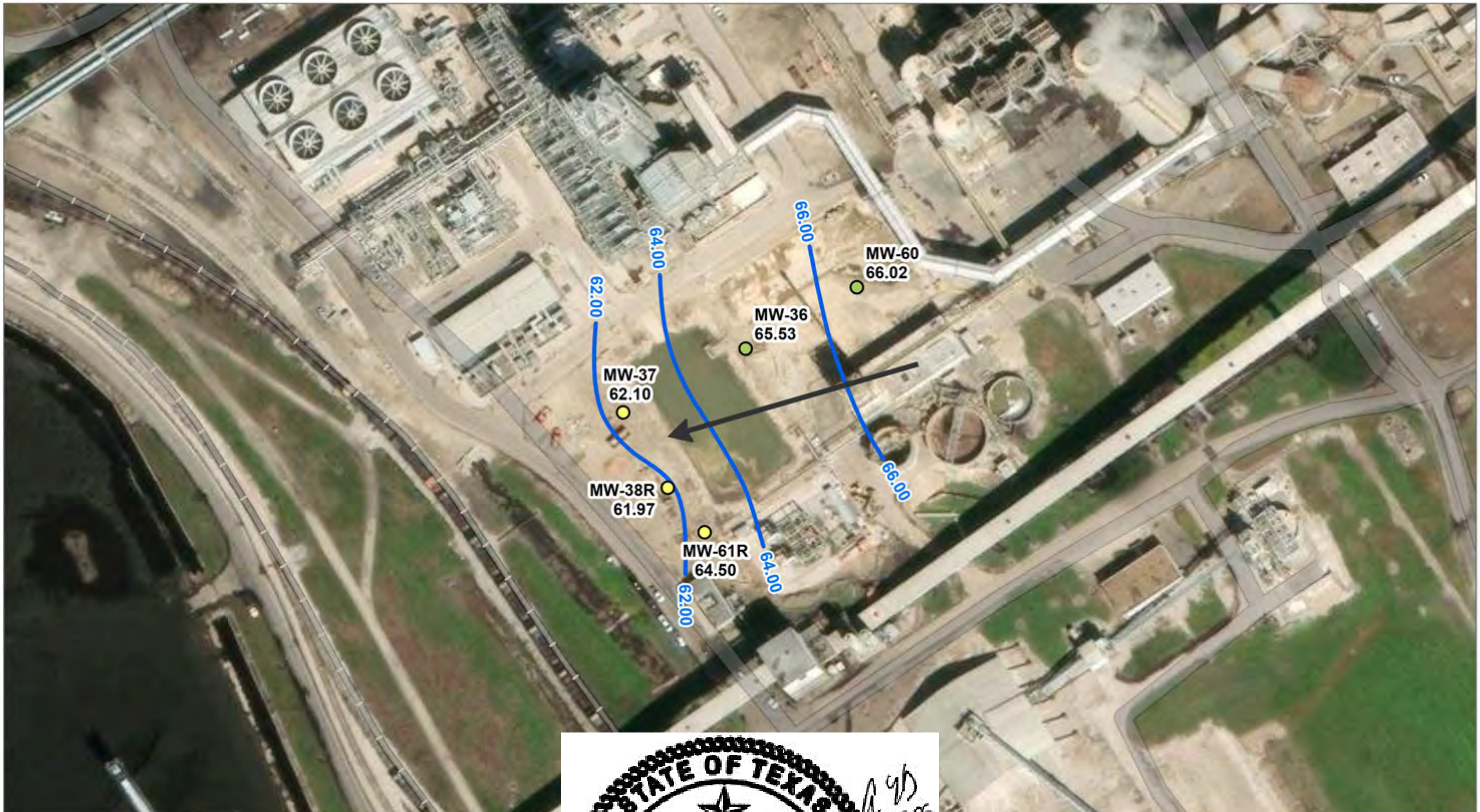
FIGURE
1

LAST EDIT: 01/22/2025 - FILE LOCATION: HOU C:\OF-TRC\DRAFTING-CDrive\ECR-Files\NRG\W.A. Parish Station - Thompsons-TX\2025\ Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg

DRAWING By: Oskar Fonseka - FILE NAME: Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg



MULTIUNIT UPGRADIENT MONITOR WELL

MULTIUNIT DOWNGRADIENT MONITOR WELL

GROUNDWATER FLOW DIRECTION

GROUNDWATER ELEVATION CONTOUR (FT MSL)

STATE OF TEXAS
ANTHONY DWORACZYK
GEOLOGY
2658
LICENSED
PROFESSIONAL GEOSCIENTIST

A. D.
12-17-25

PROJECT:	NRG TEXAS POWER, LLC W.A. PARISH STATION THOMPSONS, TEXAS
TITLE:	FGD EMERGENCY POND GROUNDWATER POTENTRIOMETRIC SURFACE MAP AUGUST 2025
DRAWN BY: M. BILLINGS	PROJ. NO.: 649506
CHECKED BY: S. MOTURI	FIGURE 2
APPROVED BY: J. ATWELL	
DATE: DECEMBER 2025	

BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

N

0 75 150 FEET

1:1,800 1" = 150'

NOTE: MW-61R WAS NOT USED FOR GROUNDWATER ELEVATION CONTOUR.

TRC

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FILE: PARISHSTATION_TX_FIGURES

COORDINATE SYSTEM: NAD 1983 2011 STATEPLANE TEXAS SOUTH CENTRAL FIPS 4204 FTUS; MAP ROTATION: 0
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11767 Katy Freeway, Suite 850 Houston, TX 77079
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December 22, 2025

Mr. Martin Torres
Section Manager
Industrial and Hazardous Waste Permits Section – MC-130
Texas Commission on Environmental Quality
PO Box 13087
Austin, Texas 78711-3087

Subject: CCR Alternate Source Demonstrations
NRG Texas W.A Parish Electric Generating Station Industrial Solid Waste Registration No. 31631
EPA Identification No. TXD097311849
RN10088312/CN603207218, CCR108

Transmitted via email CCRNotify@tceq.texas.gov

Dear Mr. Torres,

On behalf of NRG Texas, TRC is submitting enclosed the Alternate Source Demonstrations (ASDS) for the NRG W.A. Parish Electric Generating Station

NRG will continue to comply with the Texas Coal Combustion Residuals Program (CCR), Chapter 352 CCR Waste Management Rules. As always, NRG continues to be committed to working with the TCEQ and partner with the communities they serve; their common goal is the protectiveness of human health and the environment in the areas surrounding operations at their facilities.

Please do not hesitate to contact me via email at adworaczyk@trccompanies.com or phone at 832-904-1925 if you need additional information or wish to discuss this request. As always, we continue to be committed to working with the TCEQ and partner with the communities we serve; our common goal is the protectiveness of human health and the environment in the areas surrounding operations at our facilities.

Sincerely,

Tony Dworaczyk

Tony Dworaczyk, PG
Senior Project Manager
TRC

Cc: Craig Eckberg (NRG Director, Environmental Services
Carl Burch (NRG Environmental Manager)
Robert Been (NRG Sr. Environmental Specialist)

Texas Commission on Environmental Quality

Waste Permits Division Correspondence Cover Sheet

Date: December 22, 2025
Facility Name: NRG-WA Parish Generating Station
Permit or Registration No.: CCR108

Nature of Correspondence:
☒ Initial/New
☐ Response/Revision to TCEQ Tracking No.: ______ (from subject line of TCEQ letter regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Notifications
☐ New Notice of Intent	☐ Alternative Daily Cover Report
☐ Notice of Intent Revision	☐ Closure Report
☐ New Permit (including Subchapter T)	☐ Compost Report
☐ New Registration (including Subchapter T)	☒ Groundwater Alternate Source Demonstration
☐ Major Amendment	☐ Groundwater Corrective Action
☐ Minor Amendment	☐ Groundwater Monitoring Report
☐ Limited Scope Major Amendment	☐ Groundwater Background Evaluation
☐ Notice Modification	☐ Landfill Gas Corrective Action
☐ Non-Notice Modification	☐ Landfill Gas Monitoring
☐ Transfer/Name Change Modification	☐ Liner Evaluation Report
☐ Temporary Authorization	☐ Soil Boring Plan
☐ Voluntary Revocation	☐ Special Waste Request
☐ Subchapter T Disturbance Non-Enclosed Structure	☐ Other:
☐ Other:	

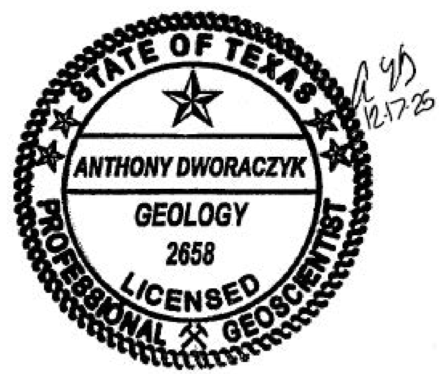
Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
☐ New	☐ Annual/Biennial Site Activity Report
☐ Renewal	☐ CPT Plan/Result
☐ Post-Closure Order	☐ Closure Certification/Report
☐ Major Amendment	☐ Construction Certification/Report
☐ Minor Amendment	☐ CPT Plan/Result
☐ CCR Registration	☐ Extension Request
☐ CCR Registration Major Amendment	☐ Groundwater Monitoring Report
☐ CCR Registration Minor Amendment	☐ Interim Status Change
☐ Class 3 Modification	☐ Interim Status Closure Plan
☐ Class 2 Modification	☐ Soil Core Monitoring Report
☐ Class 1 ED Modification	☐ Treatability Study
☐ Class 1 Modification	☐ Trial Burn Plan/Result
☐ Endorsement	☐ Unsaturated Zone Monitoring Report
☐ Temporary Authorization	☐ Waste Minimization Report
☐ Voluntary Revocation	☐ Other:
☐ 335.6 Notification	
☐ Other:	

I hereby certify that the alternative source demonstration presented within this document for the NRG WA Parish Coal Ash Disposal Landfill CCR Unit has been prepared to meet the requirements of 30 TAC 352.4; 352.941(c); and 352.1321. This document is accurate and has been prepared in accordance with good geosciences practices, including the consideration of applicable industry standards, and with the requirements of 30 TAC 352.4; 352.941(c); and 352.1321.

Name: Tony Dworaczyk **Expiration Date:** 1/30/2026

Company: TRC Environmental Corporation **Date:** 12/17/2025



Alternative Source Demonstration

W.A. Parish Electric Generating Station
Solid Waste Disposal Area (SWMU 001) CCR Multiunit

December 2025

Prepared For
NRG Texas Power, LLC
Thompsons, Texas
TCEQ Coal Combustion Residuals (CCR) Registration No. CCR108
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Executive Summary

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas. Units managing coal combustion residuals (CCR) at the Station are subject to the requirements of 30 Texas Administrative Code (TAC) Chapter 352. CCR generated at the Station consists of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge. The Site has three active CCR management units that are subject to regulation under 30 TAC Chapter 32, including the Solid Waste Disposal Area (SWDA) multi-unit landfill (Landfill), which is the subject of this Alternate Source Demonstration (ASD).

The 17th semi-annual groundwater detection monitoring event was conducted on August 8, 2025. Verification sampling was performed on September 5, 2025. Statistical evaluation of the results was performed within 60 days of sample collection to identify apparent statistically significant increases (SSIs) above background pursuant to 30 TAC 352 Subpart H. Four apparent SSIs were identified. Three of the SSIs were identified in an upgradient background monitoring well MW-23R (calcium, sulfate, and pH), one SSI was identified in upgradient monitoring well MW-28D (pH), and one SSI was identified in downgradient monitoring well MW-58 (boron). NRG notified the Texas Commission on Environmental Quality (TCEQ) of its intent to prepare an ASD.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the second half of 2019 (July) through the first half of 2021 (April). The August 8, 2025, semi-annual detection monitoring event analytical results, are the ninth data set statistically evaluated using the new background water quality data set.

This ASD successfully identified alternative sources for the apparent SSIs at the SWDA Landfill, based on the following lines of reasoning:

- Natural variations in upgradient background groundwater quality;
- Enhanced minerals dissolution and changes in geochemical conditions within the aquifer; and
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Therefore, based on the lines of reasoning presented in this ASD, alternative sources other than a release from the SWDA Landfill have been shown to be responsible for all the apparent SSIs. Based on preparation of this successful ASD, NRG will continue semi-annual detection monitoring for the SWDA Landfill per 30 TAC Chapter 352.

Section 1
Introduction

1.1 Background

The NRG Texas Power, LLC (NRG) W.A. Parish Electric Generating Station (Station) is located in Thompsons, Fort Bend County, Texas, adjacent to Smithers Lake. The electricity generating portion of the Station, or the main Plant Operations Area (Plant Area), is located along the southeastern shore of the lake.

Management of coal combustion residuals (CCR) at the Station is performed pursuant to 30 Texas Administrative Code (TAC) Chapter 352, which became effective during June 2021. Prior to this, management of CCR was performed pursuant to the United States Environmental Protection Agency (USEPA) final rule for the regulation and management of CCR under the Resource Conservation and Recovery Act (RCRA) Title 40, Code of Federal Regulations, Part 257 (40 CFR §257) (CCR Rule, effective date October 17, 2015) and the Phase 1, Part 1 final rule (July 30, 2018). CCR generated at the Station consist of fly ash, bottom ash, and flue gas desulfurization (FGD) scrubber sludge, which have been classified by the TCEQ as Class II nonhazardous waste. The Station has the following three active CCR-management units:

- Solid Waste Disposal Area (SWDA) (SWMU 001), which consists of four active CCR-management cells: Cell 1C, Cell 2A-Pug Mill, Cell 2B, and Cell 3; and is now monitored as a single CCR Multiunit.
- Air Preheater Pond (APH Pond, SWMU 021).
- FGD Emergency Pond (E Pond, SWMU 020).

The SWDA Landfill is located to the north of the Plant Area and the APH and E Ponds are located at the southern portion of the Plant Area. The locations of the three CCR units are shown on Figure 1. The SWDA Landfill is the subject of this Alternative Source Demonstration (ASD).

CCR-management activities at the SWDA Landfill are generally described as follows:

- Cell 1C – Receives nonmarketable CCR trucked from the plant;
- Cell 2B – Receives marketable CCR trucked from the plant;
- Cell 3 – Receives CCR bottom ash trucked from the plant; and
- Cell 2A-Pug Mill – Pug mill located at a small portion of Cell 2A and that is not currently being used for CCR management purposes.

1.1.1 Groundwater Monitoring Program

On behalf of NRG, Environmental Resources Management, Inc. (ERM) conducted eight independent background groundwater detection monitoring events for both the Appendix III and IV CCR constituents between April 2015 and August 2017 per §257.94(b) of the federal CCR Rule and the first semi-annual detection monitoring event in October 2017. Results of the eight background and first semi-annual detection monitoring events for the APH Pond were documented in the *Annual Groundwater Monitoring and Corrective Action Reports* (January 30, 2018) for the individual CCR landfill units (Cell 1C, Cell 2A, Cell 2B, and Cell 3) and the *CCR Groundwater Monitoring Reports* (March 1, 2018) for the individual CCR landfill units pursuant to §257.90(e).

The Station has continued to conduct semi-annual detection monitoring at the SWDA Landfill per the federal CCR Rule and 30 TAC Chapter 352. As of the August 8, 2025 sampling event, a total of 17 semi-annual detection monitoring events have now been performed. Following each semi-annual detection monitoring sampling event, the results have been evaluated for potential SSIs, and ASDs have been prepared as needed. Since implementation of 30 TAC Chapter 352, the ASDs have been submitted to TCEQ for review and approval. The semi-annual detection monitoring activities and ASDs have been included in the Annual Groundwater Monitoring and Corrective Action reports, which have been placed into the Facility Operating Record (FOR) and posted to NRG's publicly accessible website.

As previously described in the ASD for the fourth semi-annual detection monitoring event, persistent, unresolvable issues with data quality necessitated establishment of a new background water quality data set. The new background water quality data set was developed for both Appendix III and Appendix IV CCR constituents collected quarterly from the third half of 2019 (July) through the first half of 2021 (April). The August 8, 2025, semi-annual detection monitoring event analytical results, and September 5, 2025 verification sampling analytical results are the ninth data set statistically evaluated using the new background water quality data set.

1.2 Purpose

TRC prepared this ASD on behalf of NRG to evaluate apparent SSIs above background levels for the 17th semi-annual detection monitoring event in accordance with 30 TAC Chapter 352.

Section 2
Site Geology and Hydrogeology

This section provides information about the geology and hydrogeology of the Station and the area surrounding the SWDA landfill.

2.1 Hydrogeology

Based on the *Geologic Atlas of Texas, Houston Sheet* (BEG 1982), the Station is underlain by alluvium and the Beaumont formation (also commonly referred to as the Beaumont Clay). The alluvium is present along the Brazos River, which is located approximately 0.9 miles from the northern boundary of the SWDA Landfill. Both the alluvium and the Beaumont formation are composed of clay, silt, and sand; and may include stream channel, point-bar, natural levee, back swamp, coastal marsh, and mud-flat deposits. The thickness of the Beaumont formation is approximately 100 feet. The alluvium is not present at the Plant Area, which is consistent with this area being located outside of the Brazos River floodplain zone (FBC, 2018).

The alluvium and Beaumont Formation are located within the upper unit of the Chicot aquifer system. At most locations throughout Fort Bend County, the Chicot aquifer system is under confined conditions (TWDB 1990). The Chicot aquifer system is primarily recharged by precipitation at locations where it outcrops in Austin, Harris, and Waller Counties; groundwater then flows laterally within Fort Bend County (TWDB 1990). Site investigations performed by others on behalf of NRG also indicate that the uppermost groundwater-bearing units at the Station are under confined conditions (ERM, 2017a).

Environmental site investigations conducted in May 2016 and November 2016 identified three main subsurface strata at the Station, which were designated as Stratum DA-1 through DA-3 at the SWDA Landfill and Stratum PA-1 through PA-3 at the Plant Area (APH Pond and E Pond). The strata are fully described in the October 2017 *CCR Groundwater Monitoring Networks* report (ERM, 2017b) and are summarized below.

2.1.1 Stratum DA-1 (Upper Confining Unit)

Stratum DA-1 is predominately silty clay with some sandy clay, clay, and sandy silt. Stratum DA-1 is generally present from the ground surface to approximately 30 feet below ground surface (bgs), but this stratum ranges in thickness from 20 to 60 feet throughout the SWDA Landfill.

Stratum DA-1 serves as a confining unit to underlying Stratum DA-2, which comprises the uppermost groundwater-bearing unit at the Station. Geotechnical laboratory testing indicates that the hydraulic conductivity of Stratum DA-1 is 2.85E-08 centimeters per second (cm/sec) (ERM 2017b).

2.1.2 Stratum DA-2 (Upper Aquifer System)

Stratum DA-2 consists of interbedded sand, silty sand, clayey sand, and clayey sandy silt with some gravelly sand. The clay content within Stratum DA-2 varies across the SWDA. Stratum DA-2 is generally greater than 10 feet in thickness with bottom depths ranging from 60 to 80 feet bgs.

Stratum DA-2 is saturated and comprises the upper aquifer system at the SWDA Landfill. CCR monitoring wells at the SWDA Landfill are completed within Stratum DA-2. Slug testing results for CCR monitoring wells indicate hydraulic conductivity ranges from 6.86E-04 cm/sec to 2.59E-02 cm/sec in Stratum DA-2 (ERM, 2017b). Groundwater primarily flows to the northeast towards the Brazos River beneath the SWDA Landfill.

2.1.3 Stratum DA-3 (Lower Confining Unit)

Stratum DA-3 is predominantly clay to silty clay. This stratum appears to be the bottom confining layer to the overlying groundwater-bearing unit (Stratum DA-2). The thickness of Stratum DA-3 has not been determined at the SWDA Landfill.

2.1.4 Solid Waste Disposal Area – Certified Monitored Network

Four separate groundwater monitoring well systems were initially developed in 2016 for each of the four active CCR cells within the SWDA Landfill, which were certified by a Texas P.E. under 257.91(f) of the federal CCR Rule on October 17, 2017. The monitoring wells were completed into Stratum DA-2, the upper aquifer system at the Station.

Following successful preparation of the ASD in July 2018 for the first semi-annual detection monitoring event for the SWDA Landfill, the four individual CCR cells were combined into a single CCR multiunit landfill as allowed for in the federal CCR Rule for groundwater monitoring purposes. A revised groundwater monitoring system and revised statistical method were developed and certified by a Texas professional engineer (P.E.) for the SWDA Landfill. The monitoring wells comprising the revised groundwater monitoring system are shown in Table 1.

Table 1 Groundwater Monitoring System for SWDA CCR-Multiunit

UPGRADIENT WELLS	DOWNGRADIENT WELLS
MW-23R, MW-28D, MW-42, MW-43, MW-47, and MW-48	MW-44, MW-46R, MW-50, MW-52, MW-54, MW-55R, MW-58, and MW-65

Because of potential integrity issues with the construction of background monitoring well MW-23 (potential infiltration of grout into the well screen), it was replaced by MW-23R after the seventh quarterly background monitoring event, which occurred in January 2020. MW-23R was installed in close proximity to MW-23. A groundwater potentiometric surface map was prepared by TRC for the August 8, 2025 semi-annual detection monitoring event and is provided in this ASD as Figure 2. Historically, groundwater flows primarily to the northeast beneath the SWDA CCR multiunit at a gradient ranging from 0.0007 foot per foot (ft/ft) to 0.003 ft/ft.

2.2 Site Specific Information

Subsurface data from a soil boring recently installed as part of the current monitoring network at the nearby Emergency Pond (E-Pond) at the Station indicate that the subsurface geology beneath the W.A. Parish generating facility consists predominately of clays, silty clays with sandy clay, sandy silt, and sands and is consistent across the Station (ERM, Groundwater Monitoring networks, October 2017).

During the original installation of monitor wells for the W.A. Parish CCR monitoring networks, soil samples were not collected for Appendix III & IV CCR constituent analyses. In November 2024, monitor well MW-61R was installed at the E-Pond to replace MW-61 as part of the construction of a Zero Liquid Discharge (ZLD) wastewater treatment facility required under the Effluent Limitation Guidelines (ELG) for coal-fired power plants. During the installation of MW-61R, soil samples of native subsurface soils were collected on November 7, 2024, and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron, calcium, sulfate, and pH which are the apparent SSIs for this 17th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4' bgs	27-27'bgs
Calcium	3,260 mg/kg	41,600 mg/Kg
Sulfate	57.3 mg/Kg	83.0 mg/Kg
Boron	3.39 mg/kg	7.35 mg/kg
pH	8.86	8.95

Based on the consistency of the subsurface soils at the SWDA and the E-Pond, and the close proximity of the SWDA and the E-Pond, the subsurface soil laboratory analytical results for the E-Pond are considered to be representative for both CCR Units. The laboratory analytical report was included as Appendix A in the prior ASD. As shown in the above table, the concentrations of boron, calcium, and sulfate in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

2.3 Groundwater Geochemistry

Understanding the geochemistry of groundwater is essential to examining the groundwater monitoring data, explaining the relationships between the characteristics of the groundwater, and analyzing both natural and potential anthropogenic impacts on groundwater. Separate from potential source areas of contamination, geochemical processes are critical in controlling the chemical composition of groundwater, including carbonate equilibrium, oxidation-reduction reactions, and adsorption-desorption processes. Based on the site geological conditions, several groundwater parameters are discussed as follows, including calcium, sulfate, boron, and pH.

2.3.1 Calcium in Groundwater

Calcium is one of the most important ionic constituents in groundwater (Razowska-jaworek, 2014). Water-rock interaction occurs when water interacts with minerals in soils or rocks, such as limestone, marble, calcite, dolomite, gypsum, fluorite, and apatite. Natural dissolution of carbonate rocks and minerals is the primary source of calcium in groundwater (Jiang et al., 2009). Calcium is an important determinant of water hardness (Ca^{2+}), while magnesium is the other hardness determinant. The most common shallow groundwater type is Ca-HCO_3 dominated and Ca(Mg)-HCO_3 dominated.

A literature review indicates the major factors that may influence the calcium concentration in groundwater include rock weathering, soil pH, electrical conductivity, and anthropogenic activities (mining, concrete material dissolution, fertilizer etc.) (Hájek et al., 2021; Schot & Wassen, 1993; Shi et al., 2018).

Regarding the concentrations of calcium in groundwater at the SWDA, the source of calcium is more likely natural rather than anthropogenic. Therefore, the increase in concentration of calcium may be related to natural variations in groundwater geochemistry associated with rock weathering, soil pH, and electrical conductivity.

2.3.2 Sulfate in Groundwater

Sulfate is ubiquitous in groundwater, with both natural and anthropogenic sources. Apart from a potential sulfate source area, the primary origin of sulfate includes mineral dissolution, atmospheric deposition, and other anthropogenic sources (Miao et al., 2012). As water moves through soil and rock formations that contain sulfate minerals, some of the sulfate dissolves into the groundwater. Minerals that contain sulfate include magnesium sulfate (Epsom salt), sodium sulfate (Glauber's salt), and calcium sulfate (gypsum). Gypsum is an important contributor to the high levels of sulphate in many aquifers of the world. Elevated concentrations of sulfate in groundwater are common in the western part of the United States (MDH, 2008).

Sulfate is mobile in soil and inputs to soil will impact groundwater. Research investigations indicate that atmospheric deposition, dissolution of gypsum, oxidation of sulfide mineral, and anthropogenic inputs will contribute to elevated sulfate concentrations in groundwater. Based on the hydrogeology at the SWDA Landfill, atmospheric deposition and anthropogenic activities could be impacting sulfate concentrations (Einsiedl & Mayer, 2005; Pu et al., 2012).

2.3.3 Boron in Groundwater

Boron is normally considered to be a minor constituent in groundwater since it is generally present in low concentrations (Palmucci & Rusi, 2014). Apart from a potential boron source area, the primary origin of boron in groundwater is typically associated with the processes of sorption and desorption from mineral surfaces including soil and bedrock (Ravenscroft & McArthur, 2004). Boron is often cited as a contaminant trace chemical and usually occurs as a non-ionized form as H_3BO_3 in soils at pH <8.5, but above this pH, it exists as an anion, $B(OH)_4^-$ (Upadhyaya et al., 2014).

The factors that may influence the concentration of boron in groundwater include weathering, human activity, evaporative concentration, ion-exchange, electrical conductivity (EC), and pH. Ravenscroft & McArthur (2004) investigated the mechanism of regional boron enrichment in groundwater and the results indicated that the main process resulting in boron enrichment in groundwater was flushing by fresh groundwater. The desorption of boron from mineral surfaces could be affected by pH, ionic strength, salinity, and the HCO_3/CO_3 ratio. Decreases in pH will increase the dissolution of boron from the mineral surfaces. Boron adsorption favors high pH and boron desorption favors low pH in rocks, soils, and organic matters (Hollis et al., 1988; Keren & Communar, 2009; Tabelin et al., 2014).

Additional investigations confirmed that the presence of boron in groundwater depends on the EC (salinity), such that the concentration of boron increases with increasing EC. Halim et al. (2010) reported that the increase in Cl^- contributes to an increase in EC value since a strong linear correlation (R^2 = 0.88) between EC and Cl^- was observed. Palmucci & Rusi (2014) observed a clear correlation between elevated concentrations of boron and the chloride-sodium facies, which are characterized by high saline content, negative redox potential, and low value of the SO_4^{2-}/Cl^- ratio. Rodriguez-Espinosa et al. (2020) determined that the concentration of boron in groundwater was related to SO_4^{2-} and the age affect.

Regarding the concentration of boron in groundwater at the E Pond, the source of boron is natural rather than anthropogenic. Therefore, the increase in concentration of boron is related to natural variations in groundwater geochemistry, such as pH, ion exchanges, EC, and salinity.

2.3.4 pH

The apparent pH SSIs appear to be related to natural variations in groundwater quality resulting in changes in the geochemistry of the uppermost aquifer system such as pH and oxidation-reduction potential (ORP) and are also related to changes in the measured concentrations of CCR constituents.

Section 3
Alternative Source Demonstration

The 17th semi-annual detection monitoring event was conducted on August 8, 2025, per 30 TAC Chapter 352. Statistical evaluation of the results (comparison of downgradient monitoring results to 95 percent confidence/95 percent coverage upper tolerance limits [UTLs]) was performed within 60 days of sample collection to identify apparent SSIs above background pursuant to 30 TAC 352, Subpart H. Four apparent SSIs were identified: calcium, born, sulfate, and pH.

Statistical evaluation to identify SSIs for the verification sampling was conducted on September 5. Four apparent SSIs were confirmed: calcium, boron, sulfate, and pH. Based on the results of the verification sampling and statistical analysis, NRG notified the TCEQ of its intent to prepare an ASD addressing the apparent SSIs.

The UTLs and sampling results for the for the apparent SSIs are provided in Table 2 below.

Table 2 SSI – August 2025 Semi-annual Detection Monitoring Event

ANALYTE	WELL	LTL	UTL	SAMPLE DATE	VALUE	UNIT
Calcium	MW-23R	NA	418	09/05/2025	481	mg/L
pH	MW-23R	6.9	8.8	09/05/2025	6.69	SU
Sulfate	MW-23R	NA	673	09/05/2025	1,530	mg/L
pH	MW-28D	6.9	8.8	09/05/2025	6.84	SU
Boron	MW-58	NA	0.65	09/05/2025	3.30	mg/L

Notes: mg/L = milligrams per Liter
S.U. = Standard Units

MW-23R and MW-28D are located hydraulically upgradient of the SWDA and is an upgradient background monitoring location for the SWDA Landfill. Therefore, the apparent calcium, sulfate, and pH SSIs observed for MW-23R and pH SSI observed in MW-28D are likely associated with natural variations in the geochemistry of groundwater in the aquifer and are not related to a release from the SWDA Landfill.

As discussed previously in subsection 2.2 of this ASD, on November 7, 2024, during installation of monitor well MW-61R at the E-Pond to replace MW-61 as part of the construction of a ZLD wastewater treatment facility, soil samples of native subsurface soils were collected and analyzed for the Appendix III & IV CCR constituents. The soil samples were collected from the 3 to 4 feet and from the 26 to 27 feet intervals. The laboratory analytical results for boron, calcium, sulfate, and pH which are the apparent SSIs for this 17th semi-annual detection monitoring event ASD, are summarized below:

Constituent	3-4' bgs	27-27'bgs
Calcium	3,260 mg/kg	41,600 mg/Kg
Sulfate	57.3 mg/Kg	83.0 mg/Kg
Boron	3.39 mg/kg	7.35 mg/kg
pH	8.86	8.95

Based on the consistency of the subsurface soils at the Station, and the close proximity of the SWDA to the E-Pond, the subsurface soil laboratory analytical results for the E-Pond are considered to be representative for both CCR Units. As shown in the above table, the concentrations of calcium and sulfate in soils increased with depth.

Based on the results of the November 7, 2024, subsurface soils sampling event, Appendix III & IV CCR constituents naturally occur in the native soils at the Station. This indicates that Appendix III & IV CCR constituents occur naturally rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

pH and sulfate were identified as apparent SSI in downgradient monitoring wells. The pH values were slightly less than the LTL for pH and the sulfate concentration was slightly greater than its UTL. As discussed previously in subsection 2.3, Groundwater Geochemistry, natural variability in groundwater concentration is anticipated. Therefore, it is likely that the minor fluctuations in pH values and sulfate in monitor wells hydraulically downgradient of the SWDA Landfill are associated with natural variations in the geochemistry of groundwater in the aquifer such as pH and oxidation-reduction potential (ORP) and are not related to a release from the SWDA Landfill.

Section 4
Conclusions

Based on statistical evaluation of the August 8, 2025 semi-annual detection monitoring event, four apparent SSIs: calcium, boron, sulfate, and pH were identified in two upgradient background monitor wells MW-23R (sulfate, calcium, pH) and MW-28D (pH), and one downgradient monitor well MW-58 (boron). This ASD has identified the following lines of reasoning that support alternative sources for the apparent SSIs:

- Natural variations in upgradient background groundwater quality; and
- Enhanced minerals dissolution and changes in geochemical conditions within the aquifer; and
- Various concentrations of Appendix III & IV CCR constituents naturally occur in the native soils, which indicate that Appendix III & IV CCR constituents occur naturally in soil rather than anthropogenically in groundwater beneath the Station due to potential leaching and migration of CCR constituents to groundwater.

Therefore, based on the lines of reasoning presented in this ASD, alternative sources other than a release from the SWDA Landfill have been shown to be responsible for all four apparent SSIs observed in two upgradient background monitoring wells MW-23R (sulfate, calcium, pH) and MW-28D (pH), and one downgradient monitor well MW-58 (boron). Based on preparation of this successful ASD, NRG will continue semi-annual detection monitoring for the SWDA Landfill per 30 TAC Chapter 352.

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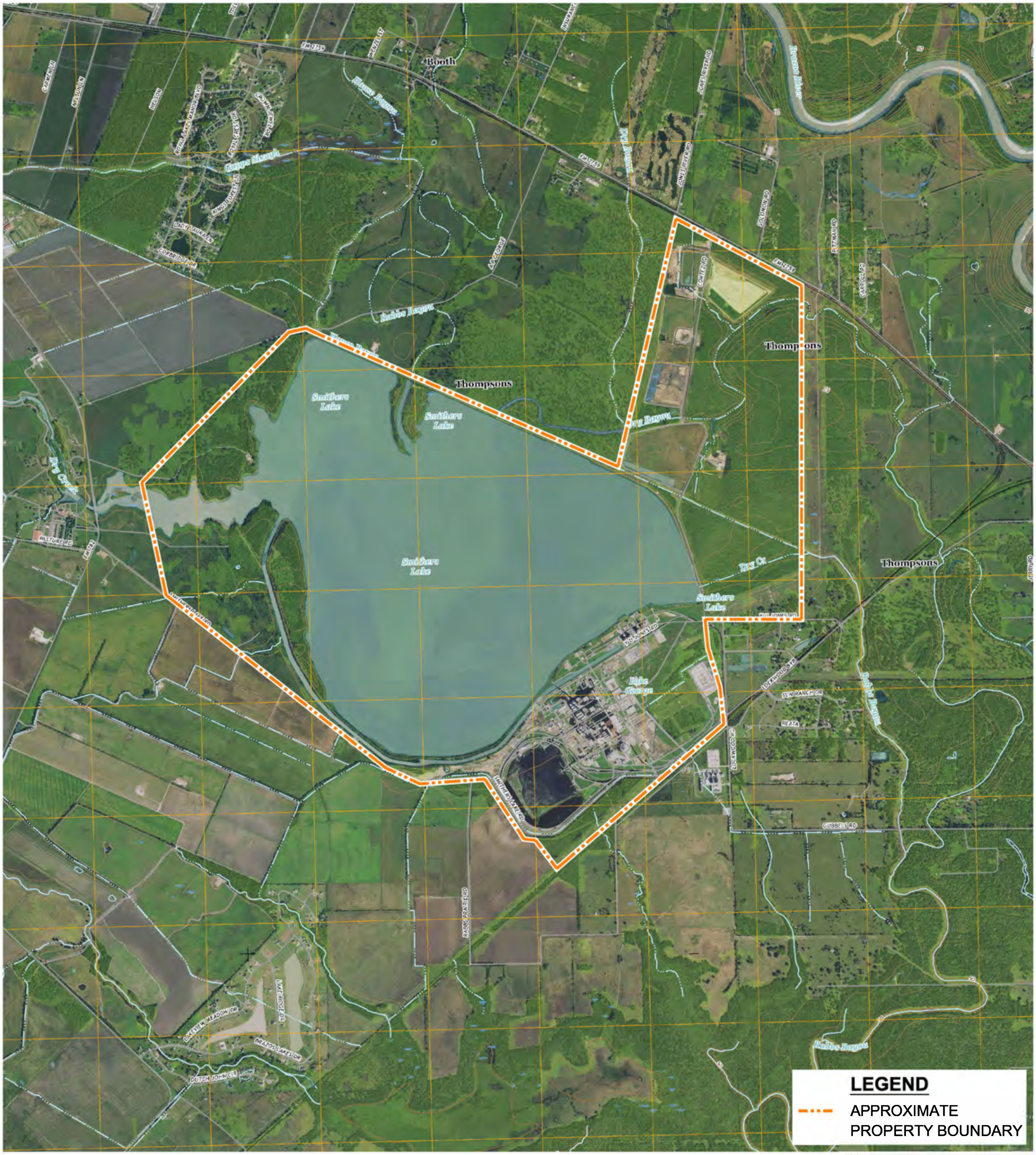
Figures



REFERENCE: U.S.G.S. 7.5 MINUTE TOPOGRAPHIC QUADRANGLES
MISSOURI CITY, TEXAS (2016) / SMITHERS LAKE, TEXAS (2016) / SUGAR LAND, TEXAS (2016) / THOMPSONS, TEXAS (2016)

TEXAS QUADRANGLE LOCATION

N

0 2,000' 4,000' 8,000'

SCALE IN FEET
1" = 4,000'-0"

CLIENT / PROJECT

NRG TEXAS POWER, LLC
W.A. Parish Station
Thompsons, Texas

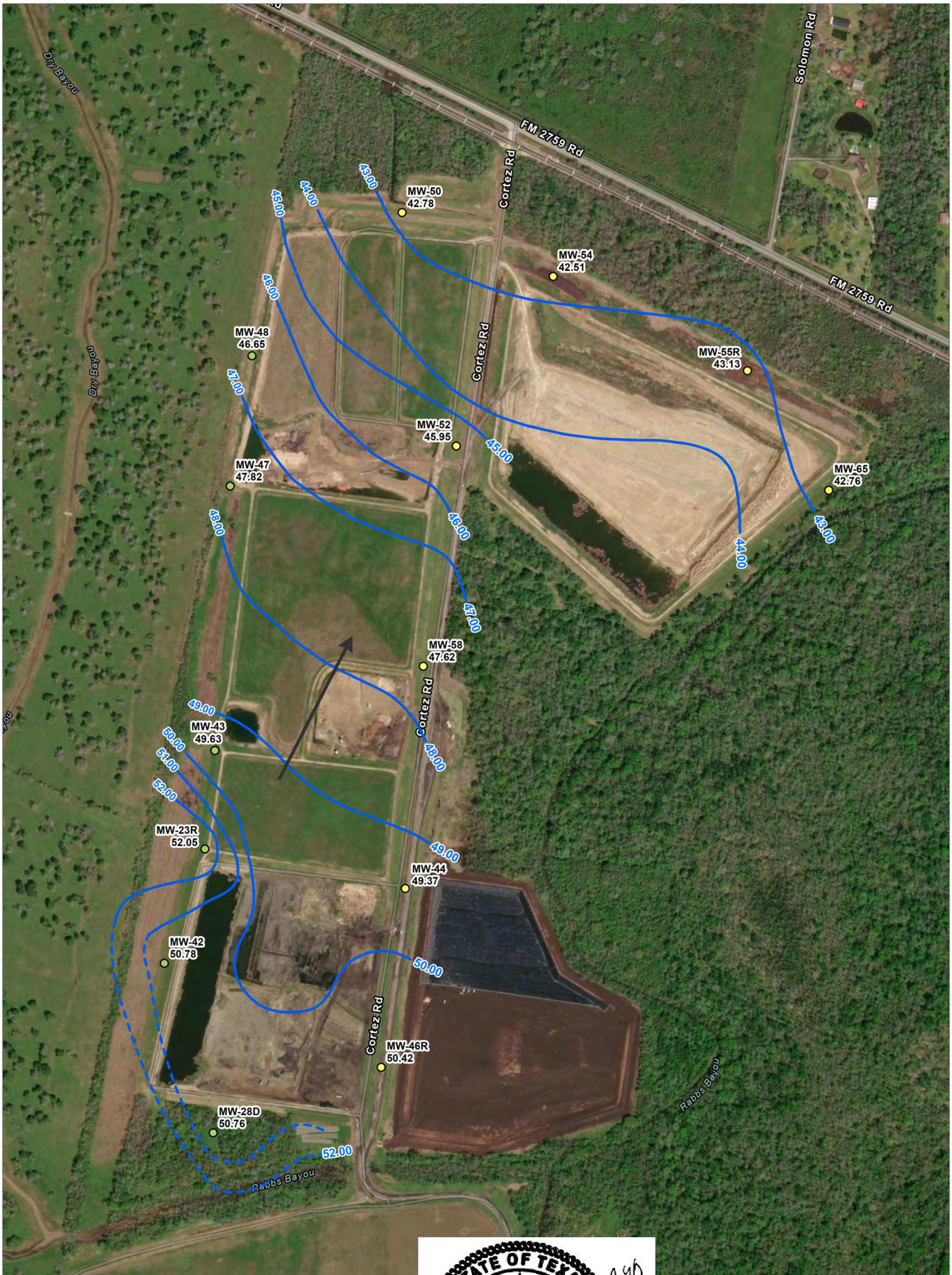
TITLE

SITE LOCATION MAP

DRAWN BY: **O. Fonseka**	REQUEST BY: **J. Atwell**	PROJECT NO. **649506**
DWG. DATE: **January 2025**	PROJECT-MGR: **T. Dworaczyk**	
TRC	11767 KATY FREEWAY, SUITE 850 HOUSTON, TEXAS 77079 PHONE: 281-616-0100 TRCcompanies.com	FIGURE **1**

LAST EDIT: 01/22/2025 - FILE LOCATION: HOU C:\OF-TRC\DRAFTING-CDrive\ECR-Files\NRG\W.A. Parish Station - Thompsons-TX\2025\ Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg

DRAWING By: Oskar Fonseka - FILE NAME: Fig 1-1 - NRG-WAParishStation - Site Location Map.dwg



STATE OF TEXAS
ANTHONY DWORACZYK
GEOLOGY
2658
LICENSED
PROFESSIONAL GEOSCIENTIST
12-17-25

MW_PTS_PROJ (DEF QUERY)
- MULTIUNIT UPGRADIENT MONITOR WELL
- MULTIUNIT DOWNGRADIENT MONITOR WELL
- GROUNDWATER FLOW DIRECTION
- GROUNDWATER ELEVATION CONTOUR - DASHED WHERE INFERRED (FT MSL)
- INFERRED

PROJECT:	NRG TEXAS POWER, LLC W.A. PARISH STATION THOMPSONS, TEXAS
TITLE:	SOLID WASTE DISPOSAL AREA GROUNDWATER POTENTIOMETRIC SURFACE WATER - AUGUST 2025
DRAWN BY:	M. BILLINGS
CHECKED BY:	S. MOTURI
APPROVED BY:	J. ATWELL
DATE:	DECEMBER 2025
PROJ. NO.:	649506
	FIGURE 2

BASE MAP: ESRI "WORLD IMAGERY" MAP SERVICE
DATA SOURCES: TRC

NOTE: GROUNDWATER ELEVATION MEASURED BY HMI ON AUGUST 2025.

0 250 500 FEET
1:6,000 1" = 500'

TRC
11767 KATY FREEWAY
SUITE 850
HOUSTON, TX 77079
PHONE: 713.244.1000

FILE: PARISHSTATION_TX_FIGURES