

**Memo**

To Jamie Schwartz, USEPA

From Alice Sandzén

Date 11 April 2023

Reference Revised OU-3 RI/FS Work Plan Addendum

Subject Addition of Monitoring Wells

Dear Jamie,

ERM Consulting & Engineering, Inc. (ERM), on behalf of the OU-3 Respondents, has prepared this revised Work Plan Addendum to the *OU-3 Remedial Investigation/ Feasibility Study Work Plan* and associated planning documents to install step-in/step-out wells. Additional details about these changes to the planning documents are described below.

1. STEP-IN/STEP-OUT WELL INSTALLATION

Additional monitoring wells will be installed to support horizontal and vertical delineation of contaminants of potential concern (COPCs) in groundwater. Maps of the proposed new well locations are attached as Figures 1a through 1c. Actual locations will depend upon receipt of access for well installation. Additional information about the current distribution of COPCs in groundwater at concentrations above screening levels, the purpose of each new location, and the status of legal access to the off-Site properties is provided below.

1.1 Off-Site Distribution of COPCs Above Screening Levels

Off-Site monitoring wells MW-402, MW-406, MW-500, MW-501, MW-502, MW-503, and MW-504 were sampled for the first time in third quarter (Q3) 2022. A summary of COPCs that were detected at concentrations exceeding United States Environmental Protection Agency (USEPA) regional screening levels (RSLs) and/or maximum contaminant levels (MCLs) in off-Site wells is provided in attached Table 1¹. A subset of the COPCs that were detected in groundwater samples from one or more off-Site monitoring wells at concentrations above MCLs are summarized in Table 1-1 below², along with 1,4-dioxane, which does not have an MCL, but is compared to the RSL instead.

¹ There are certain constituents where the method detection limit exceeds the RSL, as noted in the USEPA-approved Quality Assurance Project Plan. Attached Table 1 only includes constituents that were detected above the method detection limit at concentrations above RSLs in one or more off-Site monitoring well sample.

² Benzo(a)pyrene was detected above the RSL in MW-501-P1, MW-501-P2, and MW-501-P3. Other PAHs were detected at similar concentration levels in the MW-501 samples and other samples that were run in the same laboratory analytical batch. The PAH detections are suspected to be anomalous and were therefore not included in the summary table; see Section 3.7.1 of the 2022 Annual Report for additional details about these detections.

Table 1-1: Summary of COPCs Detected at Concentrations Above MCLs (and the RSL for 1,4-Dioxane) In Off-Site Monitoring Well Samples

Constituent	Screening Level	Number of off-Site monitoring well screen locations with a detection above the screening level	Maximum detected concentration at an off-Site well (well ID)
1,4-dioxane	0.46 µg/L (RSL)	16	235 ug/L (MW-406-P4)
Vinyl Chloride	2 µg/L (MCL)	2	16.1 ug/L (MW-501-P3)
Fluoride	4 µg/L (MCL)	5	8.2 µg/L (MW-502-P5)
Arsenic	10 µg/L (MCL)	2	10.9 ug/L (total) (MW-501-P1), 11.6 ug/L (dissolved) (MW-502-P5)
Radium-226/228	5 pCi/L (MCL)	2	5.54 pCi/L (dissolved) (MW-501-P3), 5.28 pCi/L (total) (MW-502-P4)

Note: The 1,4-dioxane detection limit in the USEPA-approved QAPP exceeds the RSL. Only detections of 1,4-dioxane above the RSL are summarized in the table above.

µg/L = micrograms per liter

pCi/L = picocuries per liter

At every monitoring well where a COPC was detected at a concentration greater than its MCL, 1,4-dioxane was also detected at a concentration greater than its RSL. Because 1,4-dioxane is the most commonly detected COPC in off-Site monitoring well groundwater samples, the distribution of 1,4-dioxane was used to determine the need for additional well locations. The distribution of 1,4-dioxane in off-Site wells sampled in Q3 2022 is shown on attached Figure 1a (Upper Alluvium), Figure 1b (Middle/Lower Alluvium) and Figure 1c (St. Louis/Salem Formations) along with the proposed well locations. Potentiometric surface maps and a discussion of groundwater flow at the Site were provided in the 2022 Annual Report submitted to USEPA on 1 March 2023.

1.2 Single-Screen Bedrock Wells

ERM proposes to install three single-screen bedrock wells adjacent to existing alluvium multi-level wells MW-402, MW-501, and MW-503. The bedrock wells will be screened in the Salem Formation. These additional bedrock wells will support the evaluation of bedrock groundwater flow and will support delineation of COPC impacts in bedrock, as described in Table 1-2 below. Single-screen bedrock wells will be installed following the methods described in the Field Sampling Plan, as amended by various Technical Memoranda.

Table 1-2: Additional Single-Screen Bedrock Wells

Well ID	Purpose
MW-402-P4	Supports horizontal delineation of COPCs detected at concentrations above screening levels in the groundwater sample from MW-406-P4 and evaluation of the potential for other contributing sources.
MW-501-P4	Supports vertical delineation of COPCs detected at concentrations above screening levels in the groundwater sample from MW-501-P3.

MW-503-P4	Supports horizontal delineation of COPCs detected at concentrations above screening levels in the groundwater sample from MW-406-P4
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1.3 Multi-Level Alluvium Wells

ERM will install four, multi-level, step-in/step-out monitoring wells that will each have three screens: one screen in each of the Upper, Middle, and Lower Alluvium. In accordance with the RI/FS Work Plan, step-in wells are located between two existing wells, reducing the spacing between wells within a transect, and step-out wells are located beyond an outermost well in a transect. The additional multi-level monitoring wells will support the evaluation of horizontal and vertical hydraulic gradients in alluvium and will support delineation of COPCs in off-Site groundwater. The type and purpose of each location are described in Table 1-3 below.

Step-in and step-out wells will be installed following the methods described in the Field Sampling Plan, as amended. WATERLOO APS™ screening samples will not be collected because the results from the WATERLOO APS™ boring advanced at the off-Site MW-501 location demonstrated that 1,4-dioxane was detected consistently throughout the saturated alluvium (see Attachment A). ERM will interpret the geophysical logging data and will select well screen intervals in accordance with the criteria in the Field Sampling Plan. Well screen intervals will be generally consistent with the well screens installed at the MW-501 location.

Step-in and step-out wells will be constructed as multi-level Water FLUTe™ wells and the well screen IDs will follow the location ID dash “P1” through “P3” nomenclature.

Table 1-3: Step-In and Step-Out Monitoring Wells

Location ID	Well Type	Purpose
MW-506	Step-In Well	Reduces the spacing between MW-500 and MW-501
MW-507	Step-Out Well	Supports horizontal delineation of COPCs detected at concentrations above screening levels in groundwater samples collected from MW-501 and MW-502
MW-508	Step-Out Well	Supports horizontal delineation of COPCs detected at concentrations above screening levels in groundwater samples collected from MW-501 and MW-502
MW-509	Step-Out Well	Supports horizontal delineation of COPCs detected at concentrations above screening levels in groundwater samples collected from MW-501 and MW-502

1.4 Access And Schedule

ERM intends to begin field work associated with this Addendum as soon as practical, following USEPA approval of the scope and acquisition of legal access to the off-Site locations. The access status for each location is described in Table 1-4 below.

Table 1-4: Access Status for Additional Off-Site Monitoring Wells

Location/Well ID	Access Plan
MW-402-P4	Access approved
MW-501-P4	Access approved

MW-503-P4	Access approved
MW-506	Access agreement with property owner for signature
MW-507	Access agreement with property owner for signature, additional access outreach in progress.
MW-508	Access approved
MW-509	Verbal approval; access agreement in progress

Note: Following installation of MW-509, PZ-704 will be properly abandoned; groundwater elevation data from PZ-704 will be replaced by groundwater elevation data from MW-509-P1.

Following USEPA's approval of this Addendum and acquisition of access to off-Site properties, ERM will provide updated FSP Figures 3-2 and 3-3 documenting the final locations of the monitoring wells and an updated field schedule (FSP Figure 8-1). In the interim, ERM, on behalf of the OU-3 Respondents, will continue to provide bi-weekly access status updates to USEPA via email and will engage USEPA where appropriate to support acquisition of off-Site access. If access is not granted to all well locations, the existing well network will be assessed to determine the need for additional wells.

Please contact me at (603) 667-0682 if you have any questions.

Sincerely,



Alice Sandzén
Project Manager

Encl.

Figure 1a—Well Locations and Q3 2022 1,4-Dioxane Results in Groundwater (Upper Alluvium)

Figure 1b—Well Locations and Q3 2022 1,4-Dioxane Results in Groundwater (Middle/Lower Alluvium)

Figure 1c—Well Locations and Q3 2022 1,4-Dioxane Results in Groundwater (St. Louis/Salem Formations)

Table 1—Summary of Screening Level Exceedances in Groundwater from Off-Site Monitoring Well Samples

Attachment A—Combined Log for MW-501

Cc:

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Tom Mahler, USEPA Region 7

Alyse Stoy, USEPA Region 7

James Curry, USEPA Region 7

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Scott Sklenar, Constellation Energy Corporation

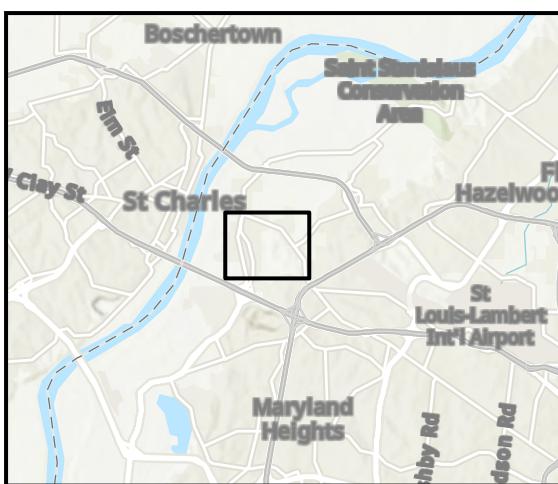
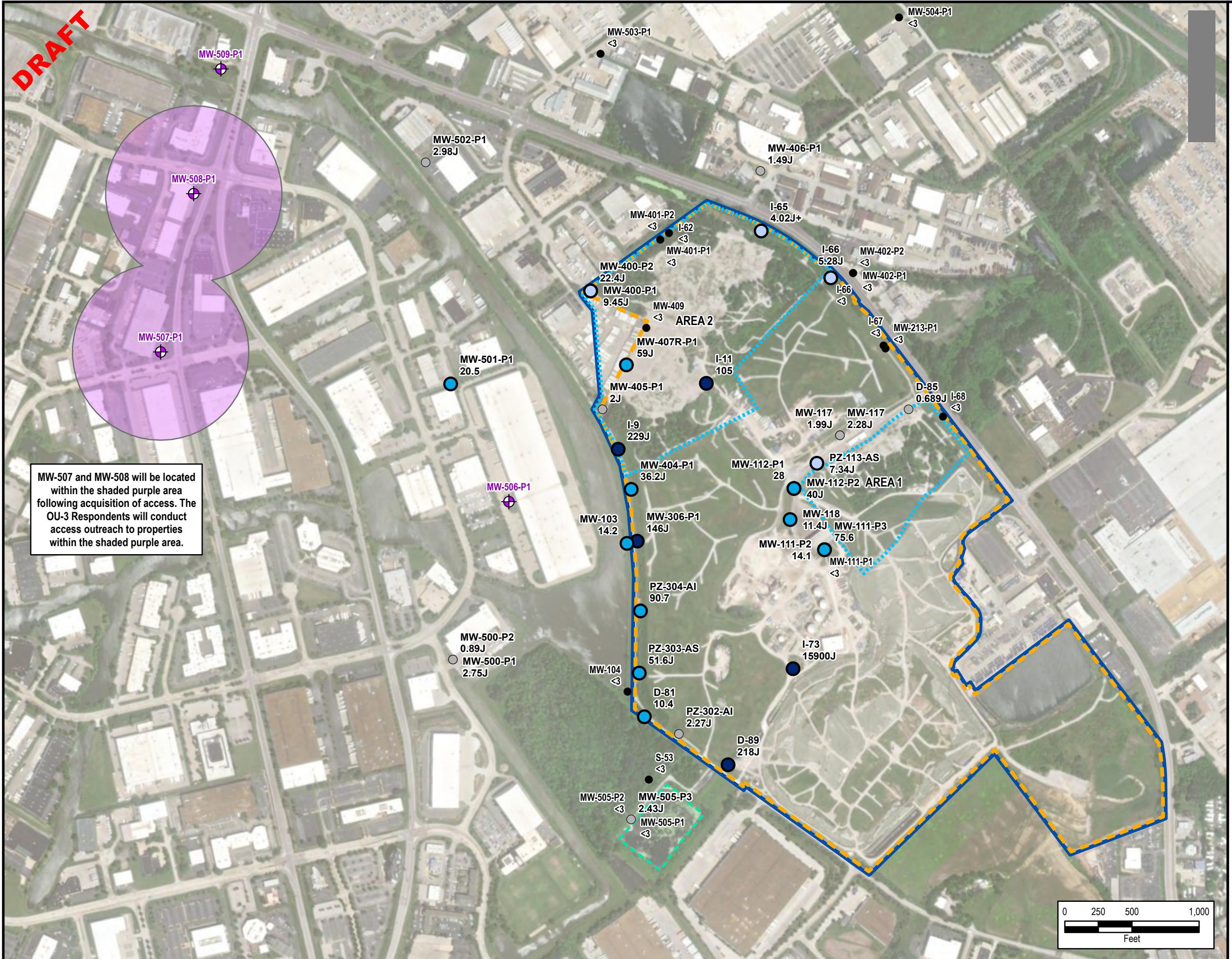
Victoria Warren, On behalf of Bridgeton Landfill, LLC

Dana Sincox, Bridgeton Landfill, LLC

Matt Stewart, Bridgeton Landfill, LCC
Darina Castillo, DOE-LM
Ralph Golia, AMO Environmental Decisions
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Stephanie Feingold, Morgan, Lewis & Bockius LLP
Steven Jawetz, Beveridge & Diamond PC
Allyn Stern, Beveridge & Diamond PC
John Cruden, Beveridge & Diamond PC
Steven Miller, U.S. Department of Energy
Philip Dupre, U.S. Department of Justice
Dan Feezor, Feezor Engineering
Jonathan Wilkinson, Feezor Engineering

FIGURES 1A, 1B, AND 1C – WELL LOCATIONS AND Q3 2022 1,4-DIOXANE RESULTS IN GROUNDWATER

DRAFT



Legend

- The map shows the proposed step-in/step-out multi-level alluvium well located approximately at the 1,4-dioxane concentration of <10 ug/L. The well is indicated by a purple circle with a cross. A legend provides the following information:

 - <10 ug/L (light blue circle)
 - 10-100 ug/L (medium blue circle)
 - >100 ug/L (dark blue circle)
 - Concentration Estimated Below RL (grey circle)
 - Not Detected (black circle)

Boundary lines are also present:

 - OU-1 (dashed blue line)
 - Former Leachate Lagoon (dashed green line)
 - Landfill Property Boundary (solid orange line)
 - Superfund Site Boundary (solid blue line)

NOTES:

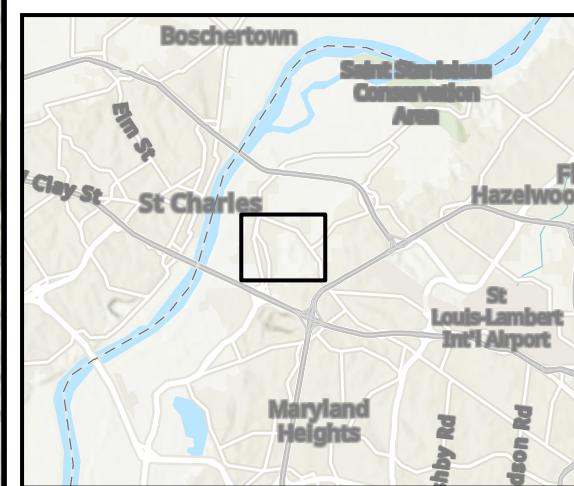
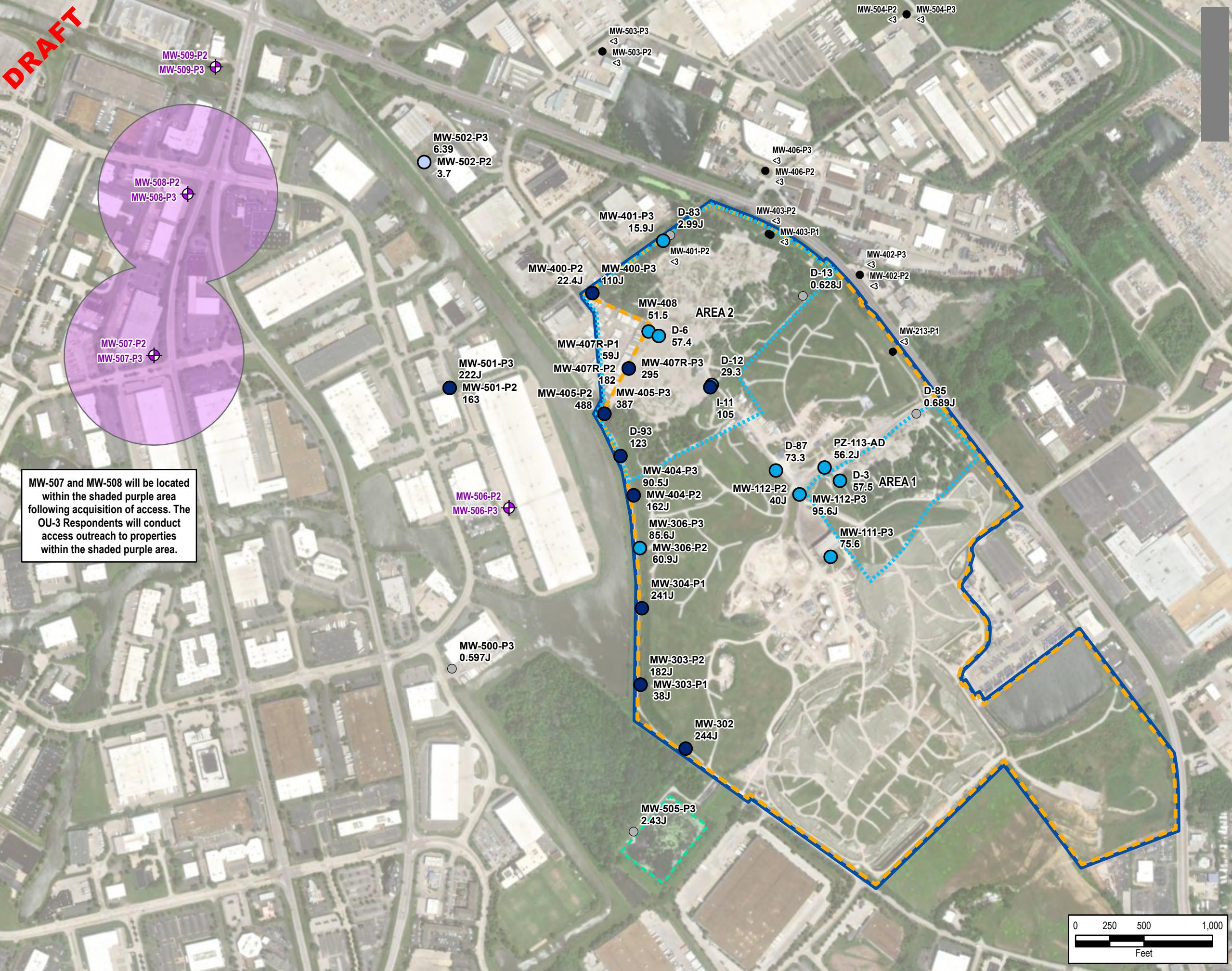
- NOTES:**

 1. The USEPA regional screening level (RSL) for 1,4-dioxane is 0.46 ug/L
 2. ug/L = Micrograms per Liter
 3. RL = Reporting Limit
 4. Where locations have multiple ports or symbols overlap, the highest value is shown on top.
 5. J = Estimated concentration.
J+ = The result is an estimated concentration, but may be biased high.

Figure 1a: Well Locations and Q3 2022 1,4 Dioxane Results in Groundwater

Upper Alluvium

West Lake Landfill OU-3
Bridgeton, Missouri

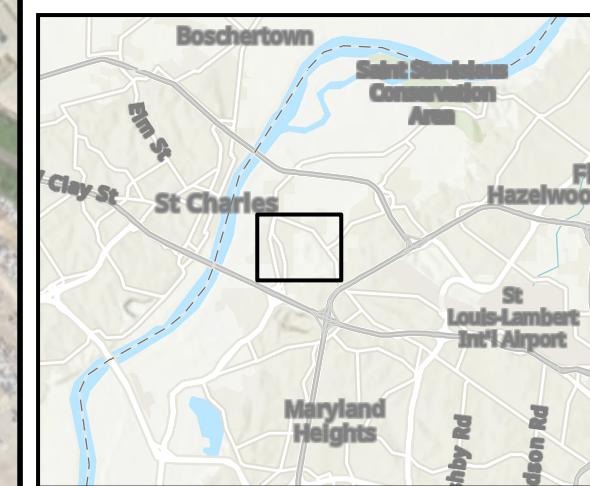
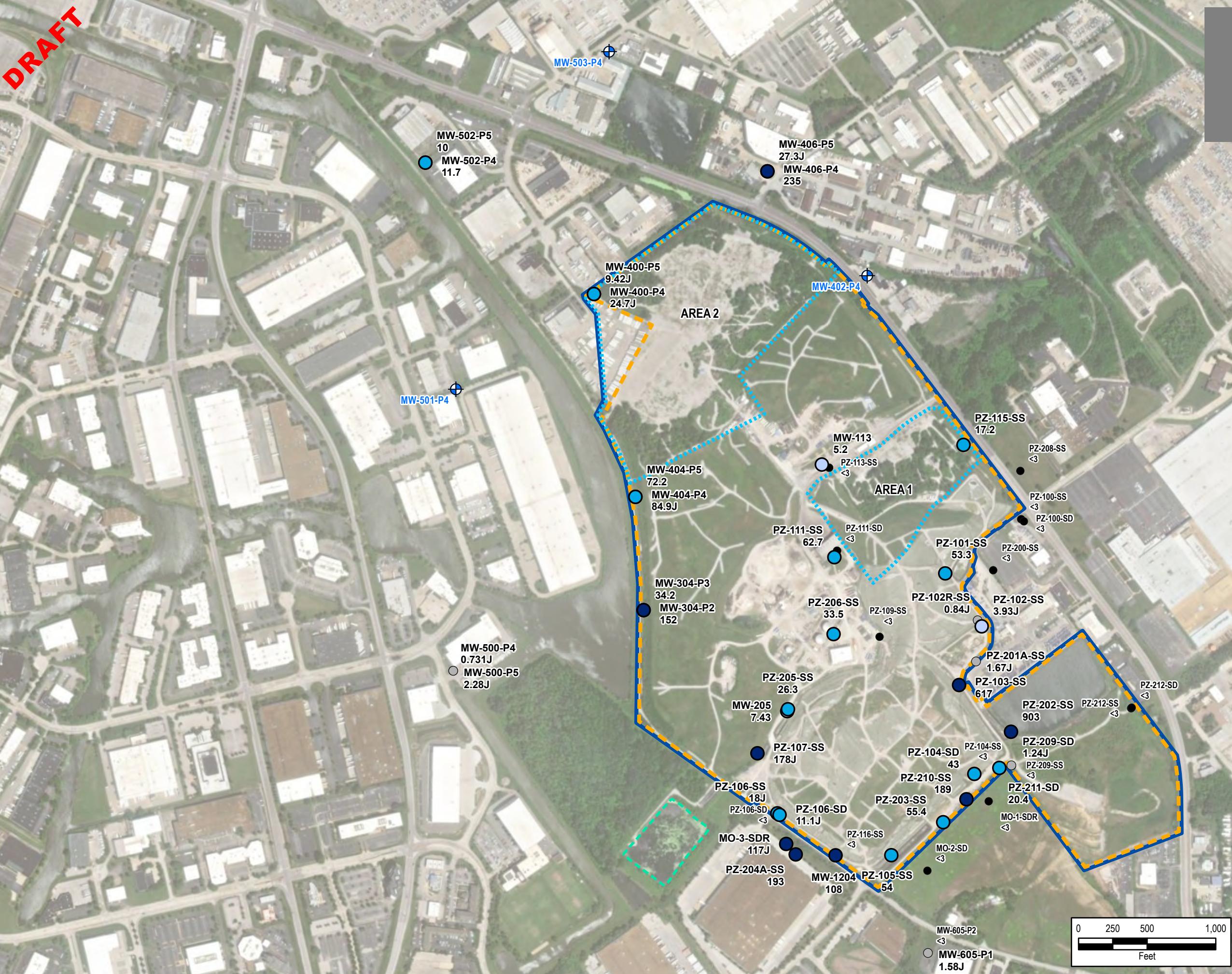


Legend

- Proposed Step-In/Step-Out Multi-Level Alluvium Well (approximate)
- 1,4-Dioxane Concentration (ug/L)
 - <10
 - 10-100
 - >100
 - Concentration Estimated Below RL
 - Not Detected
- OU-1
- Former Leachate Lagoon
- Landfill Property Boundary
- Superfund Site Boundary

- NOTES:**
- The USEPA regional screening level (RSL) for 1,4-dioxane is 0.46 ug/L
 - ug/L = Micrograms per Liter
 - RL = Reporting Limit
 - Where locations have multiple ports or symbols overlap, the highest value is shown on top.
 - J = Estimated concentration.
 - J+ = The result is an estimated concentration, but may be biased high.

Figure 1b: Well Locations and Q3 2022 1,4 Dioxane Results in Groundwater Middle/Lower Alluvium
West Lake Landfill OU-3
Bridgeton, Missouri



Legend

- Proposed Single-Screen Bedrock Well (approximate)
- 1,4-Dioxane Concentration (ug/L)
 - <10
 - 10-100
 - >100
 - Concentration Estimated Below RL
 - Not Detected
- OU-1
- Former Leachate Lagoon
- Landfill Property Boundary
- Superfund Site Boundary

**TABLE 1 – SUMMARY OF SCREENING LEVEL EXCEEDANCES IN
GROUNDWATER FROM OFF-SITE MONITORING
WELL SAMPLES**

Table 1 - Summary of Screening Level Exceedances in Groundwater from off-Site Monitoring Well Samples

West Lake OU-3

				Sample Location Sample Depth (ft BGS) Sample Date Sample Type	MW-402-P1 20-30 08-03-2022 N	MW-402-P2 50-60 08-03-2022 N	MW-402-P3 80-90 08-03-2022 N	MW-406-P1 38-48 08-09-2022 N	MW-406-P2 68-78 08-09-2022 N	MW-406-P3 98-108 08-09-2022 N	MW-406-P4 143-153 08-09-2022 N	MW-406-P5 163-173 08-09-2022 N
Analyte	Analytic Method	Unit	USEPA Primary MCL	USEPA RSL TAPWATER THQ0.1								
General Chemistry Parameters												
Fluoride	SW9056A	mg/L	4	0.08	0.33	0.58	0.32	0.42	0.27	0.32	5.9	1.9
Metals, Dissolved												
Arsenic	SW6020	ug/L	10	0.052	5.6	0.80 J	< 1.0 U	6.0	0.21 J	0.25 J	1.1	4.0
Manganese	SW6020	ug/L	NE	43	2,850	108	265	488	553	310	1,540	101
Uranium	SW6020	ug/L	30	0.4	10.9	0.28 J	0.11 J	0.44 J	0.079 J	0.018 J	0.11 J	0.12 J
Barium	SW6010B	ug/L	2,000	380	335	134	299	478	520	733	147	255
Boron	SW6010B	ug/L	NE	400	239	65.9 J	66.6 J	153	209	162	328	160
Cobalt	SW6010B	ug/L	NE	0.6	1.9 J	< 5.0 U	< 5.0 U	< 5.0 U				
Iron	SW6010B	ug/L	NE	1,400	11,400	540	3,550	3,290	11,000	8,290	19,800	1,110
Lithium	SW6010B	ug/L	NE	4	73.5	25.8	13.1 J	39.6	33.2	21.8	89.1	76.6
Molybdenum	SW6010B	ug/L	NE	10	16.6	19.9	4.6 J	3.4 J	2.8 J	< 10.0 U	< 10.0 U	< 10.0 U
Strontium	SW6010B	ug/L	NE	1,200	728	260	280	657	539	339	2,440	1,360
Metals, Total												
Arsenic	SW6020	ug/L	10	0.052	5.3	0.81 J	< 1.0 U	6.2	0.23 J	0.24 J	1.6	4.7
Manganese	SW6020	ug/L	NE	43	2,920	104	264	469	563	285	1,210	102
Uranium	SW6020	ug/L	30	0.4	11.7	0.28 J	0.12 J	0.49 J	0.074 J	0.020 J	0.10 J	0.12 J
Barium	SW6010B	ug/L	2,000	380	340	128	285	444	508	714	162	243
Boron	SW6010B	ug/L	NE	400	232	63.2 J	64.2 J	149	212	176	287	156
Cobalt	SW6010B	ug/L	NE	0.6	1.6 J	< 5.0 U	0.51 J	< 5.0 U	< 5.0 U	< 5.0 U	< 5.0 U	< 5.0 U
Iron	SW6010B	ug/L	NE	1,400	11,800	533	3,350	2,950	11,300	7,330	15,400	1,300
Lithium	SW6010B	ug/L	NE	4	70.2	25.7	13.5 J	43.0	38.3	26.6	85.5	74.9
Molybdenum	SW6010B	ug/L	NE	10	16.0	19.0	3.8 J	< 10.0 U	< 10.0 U	< 10.0 U	< 10.0 U	< 10.0 U
Strontium	SW6010B	ug/L	NE	1,200	745	244	265	623	539	373	2,140	1,280
Radiochemistry, Dissolved												
Radium-226	E903.1	pCi/L	5	NE	0.658 ± 0.489 (0.644)	0.237 ± 0.272 (0.161)	0.866 ± 0.529 (0.650)	0.849 ± 0.472 (0.177)	0.636 ± 0.472 (0.591)	0.188 ± 0.506 (0.940) U	2.03 ± 0.749 (0.540)	0.864 ± 0.523 (0.573)
Radium-228	E904.0	pCi/L	5	NE	0.919 ± 0.370 (0.530) J+	0.224 ± 0.359 (0.778) U	0.517 ± 0.336 (0.631) U	0.575 ± 0.394 (0.748) UJ	1.05 ± 0.440 (0.670) J-	1.12 ± 0.486 (0.783) J-	1.13 ± 0.504 (0.831) J-	0.489 ± 0.377 (0.737) UJ
Radium-226/228	TOTRAIUMCALCULATION	pCi/L	5	NE	1.58 ± 0.859 (1.17) J+	0.461 ± 0.631 (0.939) U	1.38 ± 0.865 (1.28)	1.42 ± 0.866 (0.925) J-	1.69 ± 0.912 (1.26) J-	1.31 ± 0.992 (1.72) UJ	3.16 ± 1.25 (1.37) J-	1.35 ± 0.900 (1.31) J-
Radiochemistry, Total												
Radium-226	E903.1	pCi/L	5	NE	1.49 ± 0.770 (0.853)	0.0542 ± 0.383 (0.764) U	0.553 ± 0.557 (0.878) U	0.946 ± 0.588 (0.580)	0.788 ± 0.543 (0.580)	1.04 ± 0.580 (0.217)	1.30 ± 0.694 (0.792)	1.94 ± 0.765 (0.676)
Radium-228	E904.0	pCi/L	5	NE	0.644 ± 0.396 (0.718) U	0.748 ± 0.383 (0.632) J+	0.367 ± 0.475 (1.01) U	0.384 ± 0.535 (1.14) UJ	1.25 ± 0.600 (1.00) J	0.833 ± 0.621 (1.21) UJ	0.541 ± 0.599 (1.25) UJ	1.55 ± 0.721 (1.22) J
Radium-226/228	TOTRAIUMCALCULATION	pCi/L	5	NE	2.13 ± 1.17 (1.57)	0.802 ± 0.766 (1.40) U	0.920 ± 1.03 (1.89) U	1.33 ± 1.12 (1.72) UJ	2.04 ± 1.14 (1.58) J	1.87 ± 1.20 (1.43) J-	1.84 ± 1.29 (2.04) UJ	3.49 ± 1.49 (1.90) J
Semivolatile Organic Compounds – PAHs, Total												
Benzo(a)anthracene	SW8270C-SIM	ug/L	NE	0.03	< 0.10 U	< 0.10 U	< 0.10 U					
Benzo(a)pyrene	SW8270C-SIM	ug/L	0.2	0.025	< 0.10 U	< 0.10 U	< 0.10 U					
Benzo(b)fluoranthene	SW8270C-SIM	ug/L	NE	0.25	< 0.10 U	< 0.10 U	< 0.10 U					
Dibenzo(a,h)anthracene	SW8270C-SIM	ug/L	NE	0.025	< 0.10 U	< 0.10 U	< 0.10 U					
Volatile Organic Compounds, Total												
1,4-Dioxane	SW8260B_SIM	ug/L	NE	0.46	< 3.00 UJ	< 3.00 UJ	< 3.00 UJ	1.49 J	< 3.00 UJ	< 3.00 UJ	235	27.3 J
cis-1,2-Dichloroethene	SW8260C	ug/L	70	3.6	< 1.0 U	< 1.0 U	< 1.0 U					
Vinyl chloride	SW8260C	ug/L	2	0.019	< 1.0 U	< 1.0 U	< 1.0 U					

Notes:

ft BGS = feet below ground surface

ug/L = micrograms per liter

mg/L = milligrams per liter

pCi/L = picoCuries per liter

USEPA Primary MCL = USEPA National Primary Drinking Water Regulation (May 2009).

MCLs are for combined radium-226-228 (5 pCi/L) and gross alpha

including uranium (45 pCi/L)

USEPA RSL TAPWATER THQ0.1 = RSL TAPWATER (TR=1E-06, THQ=0.1) Nov 2021, adapted for West Lake QAPP

Radiochemistry data is shown in the following format: activity ± total uncertainty (minimum detectable concentration) qualifiers

Bold = Detected

Blue Font = Exceeds USEPA Primary MCL

Orange Shaded = Detected value exceeds USEPA RSL TAPWATER THQ0.1

Gray Shaded = Compound not detected above the reporting detection limit but reporting detection limit exceeds USEPA RSL TAPWATER THQ0.1

NE = Not Established

NA = Not Available

Qualifier

Table 1 - Summary of Screening Level Exceedances in Groundwater from off-Site Monitoring Well Samples
West Lake OU-3

				Sample Location Sample Depth (ft BGS) Sample Date Sample Type	MW-500-P1 20.3-30.3 08-08-2022 N	MW-500-P2 60.3-70.3 08-08-2022 N	MW-500-P3 100.3-110.3 08-08-2022 N	MW-500-P4 135.3-145.3 08-08-2022 N	MW-500-P5 160.3-170.3 08-09-2022 N	MW-500-P5 160.3-170.3 08-10-2022 N	MW-501-P1 20.17-30.17 08-02-2022 N	MW-501-P2 75.17-85.17 08-02-2022 N	MW-501-P2 75.17-85.17 08-23-2022 N
Analyte	Analytic Method	Unit	USEPA Primary MCL THQ0.1										
General Chemistry Parameters													
Fluoride	SW9056A	mg/L	4	0.08	0.54	0.27	0.23	0.40	NA	4.6	0.34	0.17	NA
Metals, Dissolved													
Arsenic	SW6020	ug/L	10	0.052	4.2	0.36 J	1.0	0.66 J	0.88 J	NA	11.5	NA	1.5
Manganese	SW6020	ug/L	NE	43	1,190	363	290	185	31.6	NA	4,570	NA	2,160
Uranium	SW6020	ug/L	30	0.4	5.3	0.25 J	0.11 J	0.29 J	0.41 J	NA	0.46 J	NA	0.36 J
Barium	SW6010B	ug/L	2,000	380	438	972	839	860	170	NA	617	NA	1,550
Boron	SW6010B	ug/L	NE	400	76.6 J	67.3 J	73.2 J	78.1 J	986	NA	113	NA	155
Cobalt	SW6010B	ug/L	NE	0.6	< 5.0 U	< 5.0 U	< 5.0 U	< 5.0 U	NA	< 5.0 U	NA	NA	0.91 J
Iron	SW6010B	ug/L	NE	1,400	8,100	11,900	15,000	13,500	420	NA	45,700	NA	28,400
Lithium	SW6010B	ug/L	NE	4	49.0	38.7	25.0	33.1	147	NA	53.2	NA	33.4
Molybdenum	SW6010B	ug/L	NE	10	20.0	< 10.0 U	< 10.0 U	< 10.0 U	NA	8.5 J	NA	< 10.0 U	NA
Strontium	SW6010B	ug/L	NE	1,200	858	905	799	940	4,780	NA	1,640	NA	1,480
Metals, Total													
Arsenic	SW6020	ug/L	10	0.052	3.1	0.38 J	0.82 J	0.67 J	0.85 J	NA	10.9	NA	1.4
Manganese	SW6020	ug/L	NE	43	1,170	358	301	175	31.7	NA	4,590	NA	2,110
Uranium	SW6020	ug/L	30	0.4	5.1	0.29 J	0.14 J	0.31 J	0.40 J	NA	0.51 J	NA	0.35 J
Barium	SW6010B	ug/L	2,000	380	458	1,110	827	824	166	NA	644	NA	1,520
Boron	SW6010B	ug/L	NE	400	73.2 J	62.7 J	61.9 J	78.9 J	968	NA	119	NA	134
Cobalt	SW6010B	ug/L	NE	0.6	< 5.0 U	< 5.0 U	< 5.0 U	< 5.0 U	NA	0.88 J	NA	0.84 J	NA
Iron	SW6010B	ug/L	NE	1,400	8,700	12,900	15,100	13,900	520	NA	47,100	NA	28,600
Lithium	SW6010B	ug/L	NE	4	43.9	34.2	21.8	27.5	154	NA	56.8	NA	32.6
Molybdenum	SW6010B	ug/L	NE	10	22.0	2.8 J	< 10.0 U	< 10.0 U	NA	8.2 J	NA	< 10.0 U	NA
Strontium	SW6010B	ug/L	NE	1,200	880	945	764	969	4,760	NA	1,640	NA	1,410
Radiochemistry, Dissolved													
Radium-226	E903.1	pCi/L	5	NE	0.900 ± 0.686 (0.976) U	0.641 ± 0.477 (0.628)	0.899 ± 0.737 (1.10) U	2.03 ± 0.923 (0.938)	NA	2.50 ± 1.07 (1.09)	1.06 ± 0.731 (0.998)	1.17 ± 0.545 (0.168)	NA
Radium-228	E904.0	pCi/L	5	NE	1.62 ± 0.606 (0.892)	1.08 ± 0.458 (0.690)	2.64 ± 0.730 (0.802)	2.52 ± 0.710 (0.777)	NA	0.881 ± 0.487 (0.875) J-	1.67 ± 0.574 (0.817)	2.79 ± 0.695 (0.605)	NA
Radium-226/228	TOTRAIUMCALCULATION	pCi/L	5	NE	2.52 ± 1.29 (1.87)	1.72 ± 0.935 (1.32)	3.54 ± 1.47 (1.90)	4.55 ± 1.63 (1.72)	NA	3.38 ± 1.56 (1.97) J-	2.73 ± 1.31 (1.82)	3.96 ± 1.24 (0.773)	NA
Radiochemistry, Total													
Radium-226	E903.1	pCi/L	5	NE	0.524 ± 0.533 (0.806) U	0.723 ± 0.430 (0.409) J-	1.15 ± 0.769 (0.989)	0.925 ± 0.684 (0.926) U	NA	2.72 ± 0.910 (0.618)	0.857 ± 0.380 (0.111)	1.49 ± 0.684 (0.770)	NA
Radium-228	E904.0	pCi/L	5	NE	0.919 ± 0.539 (0.951) U	1.67 ± 0.700 (1.10) J-	2.86 ± 0.922 (1.18)	2.58 ± 0.985 (1.50)	NA	1.10 ± 0.631 (1.12) U	0.848 ± 0.391 (0.651)	2.19 ± 0.581 (0.538)	NA
Radium-226/228	TOTRAIUMCALCULATION	pCi/L	5	NE	1.44 ± 1.07 (1.76) U	2.39 ± 1.13 (1.51) J-	4.01 ± 1.69 (2.17)	3.51 ± 1.67 (2.43)	NA	3.82 ± 1.54 (1.74)	1.71 ± 0.771 (0.762)	3.68 ± 1.27 (1.31)	NA
Semivolatile Organic Compounds – PAHs, Total													
Benzo(a)anthracene	SW8270C-SIM	ug/L	NE	0.03	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	NA	0.34	0.47	NA	NA
Benzo(a)pyrene	SW8270C-SIM	ug/L	0.2	0.025	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	NA	0.48	0.68	NA	NA
Benzo(b)fluoranthene	SW8270C-SIM	ug/L	NE	0.25	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	NA	0.24	0.35	NA	NA
Dibenzo(a,h)anthracene	SW8270C-SIM	ug/L	NE	0.025	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	NA	0.14	0.20	NA	NA
Volatile Organic Compounds, Total													
1,4-Dioxane	SW8260B_SIM	ug/L	NE	0.46	2.75 J	0.890 J	0.597 J	0.731 J	2.28 J	NA	20.5	163	NA
cis-1,2-Dichloroethene	SW8260C	ug/L	70	3.6	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	NA	< 1.0 U	< 1.0 U	< 1.0 U	NA
Vinyl chloride	SW8260C	ug/L	2	0.019	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	NA	0.57 J	2.6	NA	NA

Notes:

ft BGS = feet below ground surface

ug/L = micrograms per liter

mg/L = milligrams per liter

pCi/L = picoCuries per liter

USEPA Primary MCL = USEPA National Primary Drinking Water Regulation (May 2009).

MCLs are for combined radium-226-228 (5 pCi/L) and gross alpha

including uranium (45 pCi/L)

USEPA RSL TAPWATER THQ0.1 = RSL TAPWATER (TR=1E-06, THQ=0.1) Nov 2021, adapted for West Lake QAPP

Radiochemistry data is shown in the following format: activity ± total uncertainty (minimum detectable concentration) qualifiers

Bold = Detected

Blue Font = Exceeds USEPA Primary MCL

Orange Shaded = Detected value exceeds USEPA RSL TAPWATER THQ0.1

Gray Shaded = Compound not detected above the reporting detection limit but reporting detection limit exceeds USEPA RSL TAPWATER THQ0.1

NE = Not Established

Table 1 - Summary of Screening Level Exceedances in Groundwater from off-Site Monitoring Well Samples
West Lake OU-3

			Sample Location Sample Depth (ft BGS) Sample Date Sample Type	MW-501-P3 95.17-105.17 08-02-2022 N	MW-502-P1 30-40 08-10-2022 N	MW-502-P2 70-80 08-10-2022 N	MW-502-P3 90-100 08-10-2022 N	MW-502-P4 135-145 08-10-2022 N	MW-502-P5 200-210 08-17-2022 N	MW-502-P5 200-210 08-18-2022 N	MW-502-P5 200-210 08-19-2022 N	
Analyte	Analytic Method	Unit	USEPA Primary MCL THQ0.1									
General Chemistry Parameters												
Fluoride	SW9056A	mg/L	4	0.08	3.5	0.33	1.4	4.4	4.4	NA	8.2	NA
Metals, Dissolved												
Arsenic	SW6020	ug/L	10	0.052	2.3	6.7	0.83 J	0.77 J	5.2	NA	NA	11.6
Manganese	SW6020	ug/L	NE	43	607	819	395	192	136	NA	NA	44.5
Uranium	SW6020	ug/L	30	0.4	0.61 J	6.0	0.14 J	0.38 J	0.52 J	NA	NA	0.52 J
Barium	SW6010B	ug/L	2,000	380	399	463	808	623	246	NA	NA	105
Boron	SW6010B	ug/L	NE	400	589	85.2 J	287	354	386	NA	NA	1,910
Cobalt	SW6010B	ug/L	NE	0.6	1.7 J	0.52 J	< 5.0 U	0.54 J	0.57 J	NA	NA	< 5.0 U
Iron	SW6010B	ug/L	NE	1,400	20,600	5,590	9,660	10,300	5,110	NA	NA	818
Lithium	SW6010B	ug/L	NE	4	41.4	27.9	28.7	31.9	46.0	NA	NA	275
Molybdenum	SW6010B	ug/L	NE	10	< 10.0 U	6.5 J	< 10.0 U	< 10.0 U	< 10.0 U	NA	NA	8.2 J
Strontium	SW6010B	ug/L	NE	1,200	855	536	445	566	9,090	NA	NA	3,150
Metals, Total												
Arsenic	SW6020	ug/L	10	0.052	2.2	7.0	0.80 J	0.70 J	4.8	NA	10.1	NA
Manganese	SW6020	ug/L	NE	43	598	837	398	198	140	NA	59.6	NA
Uranium	SW6020	ug/L	30	0.4	0.62 J	6.3	0.13 J	0.35 J	0.56 J	NA	0.51 J	NA
Barium	SW6010B	ug/L	2,000	380	408	444	759	599	242	NA	165	NA
Boron	SW6010B	ug/L	NE	400	582	83.5 J	281	357	386	NA	1,740	NA
Cobalt	SW6010B	ug/L	NE	0.6	2.0 J	< 5.0 U	< 5.0 U	< 5.0 U	< 5.0 U	NA	< 5.0 U	NA
Iron	SW6010B	ug/L	NE	1,400	20,800	5,590	9,340	11,200	5,280	NA	2,410	NA
Lithium	SW6010B	ug/L	NE	4	44.5	27.2	25.8	28.2	40.7	NA	269	NA
Molybdenum	SW6010B	ug/L	NE	10	< 10.0 U	6.1 J	< 10.0 U	< 10.0 U	2.4 J	NA	7.9 J	NA
Strontium	SW6010B	ug/L	NE	1,200	852	511	422	528	8,580	NA	3,230	NA
Radiochemistry, Dissolved												
Radium-226	E903.1	pCi/L	5	NE	1.76 ± 0.835 (0.648)	0.229 ± 0.581 (1.08) U	0.463 ± 0.483 (0.682) U	1.71 ± 0.972 (1.18)	3.14 ± 1.07 (0.593)	NA	NA	1.28 ± 0.592 (0.182)
Radium-228	E904.0	pCi/L	5	NE	3.78 ± 0.894 (0.735)	0.388 ± 0.448 (0.940) UJ	1.31 ± 0.639 (1.10) J-	0.778 ± 0.435 (0.775) J-	0.979 ± 0.550 (0.988) UJ	NA	NA	0.792 ± 0.657 (1.32) U
Radium-226/228	TOTRADIUMCALCULATION	pCi/L	5	NE	5.54 ± 1.73 (1.38)	0.617 ± 1.03 (2.02) UJ	1.77 ± 1.12 (1.78) UJ	2.49 ± 1.41 (1.96) J-	4.12 ± 1.62 (1.58) J-	NA	NA	2.07 ± 1.25 (1.50)
Radiochemistry, Total												
Radium-226	E903.1	pCi/L	5	NE	1.61 ± 0.528 (0.107)	0.782 ± 0.511 (0.627)	0.897 ± 0.625 (0.815)	1.18 ± 0.621 (0.669)	3.26 ± 1.00 (0.828)	0.843 ± 0.627 (0.825) J-	NA	NA
Radium-228	E904.0	pCi/L	5	NE	3.63 ± 0.863 (0.723)	1.01 ± 0.661 (1.26) U	0.927 ± 0.604 (1.14) U	0.976 ± 0.610 (1.14) U	2.02 ± 0.808 (1.19)	0.467 ± 0.422 (0.857) U	NA	NA
Radium-226/228	TOTRADIUMCALCULATION	pCi/L	5	NE	5.24 ± 1.39 (0.830)	1.79 ± 1.17 (1.89) U	1.82 ± 1.23 (1.96) U	2.16 ± 1.23 (1.81)	5.28 ± 1.81 (2.02)	1.31 ± 1.05 (1.68) UJ	NA	NA
Semivolatile Organic Compounds – PAHs, Total												
Benzo(a)anthracene	SW8270C-SIM	ug/L	NE	0.03	0.53	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	NA	< 0.10 U	NA
Benzo(a)pyrene	SW8270C-SIM	ug/L	0.2	0.025	0.81	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	NA	< 0.10 U	NA
Benzo(b)fluoranthene	SW8270C-SIM	ug/L	NE	0.25	0.40	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	NA	< 0.10 U	NA
Dibenzo(a,h)anthracene	SW8270C-SIM	ug/L	NE	0.025	0.22	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	NA	< 0.10 U	NA
Volatile Organic Compounds, Total												
1,4-Dioxane	SW8260B_SIM	ug/L	NE	0.46	222 J	2.98 J	3.70	6.39	11.7	10.0	NA	NA
cis-1,2-Dichloroethene	SW8260C	ug/L	70	3.6	4.7	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	NA	NA
Vinyl chloride	SW8260C	ug/L	2	0.019	16.1	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	NA	NA

Notes:

ft BGS = feet below ground surface

ug/L = micrograms per liter

mg/L = milligrams per liter

pCi/L = picoCuries per liter

USEPA Primary MCL = USEPA National Primary Drinking Water Regulation (May 2009).

MCLs are for combined radium-226-228 (5 pCi/L) and gross alpha

including uranium (15 pCi/L)

USEPA RSL TAPWATER THQ0.1 = RSL TAPWATER (TR=1E-06, THQ=0.1) Nov 2021, adapted for West Lake QAPP

Radiochemistry data is shown in the following format: activity ± total uncertainty (minimum detectable concentration) qualifiers

Bold = Detected

Blue Font = Exceeds USEPA Primary MCL

Orange Shaded = Detected value exceeds USEPA RSL TAPWATER THQ0.1

Gray Shaded = Compound not detected above the reporting detection limit but reporting detection limit exceeds USEPA RSL TAPWATER THQ0.1

NE = Not Established

NA = Not Available

Qualifier Definition

J = Estimated concentration.

J+ = The result is an estimated concentration, but may be biased high.

J- = The result is an estimated concentration, but may be biased low.

U = The analyte was analyzed for but was not detected at or above the referenced reporting limit.

UJ = The analyte was analyzed for, but was not detected. The reporting limit is approximate and may be inaccurate or imprecise.

Table 1 - Summary of Screening Level Exceedances in Groundwater from off-Site Monitoring Well Samples

West Lake OU-3

				Sample Location Sample Depth (ft BGS) Sample Date Sample Type	MW-503-P1 20-30 08-03-2022 N	MW-503-P2 55-65 08-03-2022 N	MW-503-P3 100-110 08-03-2022 N	MW-504-P1 25-35 08-05-2022 N	MW-504-P2 55-65 08-05-2022 N	MW-504-P3 85-95 08-05-2022 N
Analyte	Analytic Method	Unit	USEPA Primary MCL	USEPA RSL TAPWATER THQ0.1						
General Chemistry Parameters										
Fluoride	SW9056A	mg/L	4	0.08	0.26	0.16	0.45	0.31	0.30	0.22
Metals, Dissolved										
Arsenic	SW6020	ug/L	10	0.052	1.3	< 1.0 U	< 1.0 U	4.2	0.70 J	0.21 J
Manganese	SW6020	ug/L	NE	43	732	168	270	461	264	464
Uranium	SW6020	ug/L	30	0.4	1.6	< 1.0 U	0.027 J	0.22 J	0.025 J	0.081 J
Barium	SW6010B	ug/L	2,000	380	339	323	385	320	390	468
Boron	SW6010B	ug/L	NE	400	107	42.0 J	89.4 J	59.0 J	75.0 J	90.6 J
Cobalt	SW6010B	ug/L	NE	0.6	1.3 J	< 5.0 U	< 5.0 U	< 5.0 U	< 5.0 U	< 5.0 U
Iron	SW6010B	ug/L	NE	1,400	9,100	1,700	4,080	4,460	6,840	8,680
Lithium	SW6010B	ug/L	NE	4	31.5	7.5 J	13.8 J	26.0	16.4 J	14.2 J
Molybdenum	SW6010B	ug/L	NE	10	3.8 J	< 10.0 U	< 10.0 U	11.6	< 10.0 U	< 10.0 U
Strontium	SW6010B	ug/L	NE	1,200	420	282	229	281	260	241
Metals, Total										
Arsenic	SW6020	ug/L	10	0.052	1.2	< 1.0 U	0.18 J	4.0	0.74 J	0.22 J
Manganese	SW6020	ug/L	NE	43	760	170	268	431	265	471
Uranium	SW6020	ug/L	30	0.4	1.6	0.0090 J	0.033 J	0.20 J	0.030 J	0.087 J
Barium	SW6010B	ug/L	2,000	380	331	314	359	310	389	463
Boron	SW6010B	ug/L	NE	400	104	40.8 J	83.4 J	58.0 J	75.3 J	90.1 J
Cobalt	SW6010B	ug/L	NE	0.6	1.2 J	< 5.0 U	< 5.0 U	< 5.0 U	< 5.0 U	< 5.0 U
Iron	SW6010B	ug/L	NE	1,400	8,850	1,660	3,950	4,500	6,960	8,470
Lithium	SW6010B	ug/L	NE	4	27.2	7.8 J	13.8 J	28.5	20.8	15.7 J
Molybdenum	SW6010B	ug/L	NE	10	< 10.0 U	< 10.0 U	< 10.0 U	12.0	< 10.0 U	< 10.0 U
Strontium	SW6010B	ug/L	NE	1,200	410	274	215	268	258	238
Radiochemistry, Dissolved										
Radium-226	E903.1	pCi/L	5	NE	0.0637 ± 0.330 (0.685) U	0.186 ± 0.501 (0.930) U	0.0516 ± 0.417 (0.819) U	0.841 ± 0.560 (0.721) J	0.586 ± 0.465 (0.631) UJ	0.613 ± 0.429 (0.517) J-
Radium-228	E904.0	pCi/L	5	NE	0.634 ± 0.436 (0.850) U	0.721 ± 0.428 (0.796) U	0.567 ± 0.844 (1.82) U	0.655 ± 0.434 (0.825) U	0.111 ± 0.268 (0.598) U	1.04 ± 0.412 (0.629)
Radium-226/228	TOTRAIUMCALCULATION	pCi/L	5	NE	0.698 ± 0.766 (1.54) U	0.907 ± 0.929 (1.73) U	0.619 ± 1.26 (2.64) U	1.50 ± 0.994 (1.55) UJ	0.697 ± 0.733 (1.23) UJ	1.65 ± 0.841 (1.15) J-
Radiochemistry, Total										
Radium-226	E903.1	pCi/L	5	NE	0.406 ± 0.286 (0.138)	0.154 ± 0.363 (0.673) U	0.518 ± 0.379 (0.424)	0.0758 ± 0.493 (0.994) U	-0.163 ± 0.451 (1.07) U	0.0784 ± 0.596 (1.18) U
Radium-228	E904.0	pCi/L	5	NE	0.778 ± 0.615 (1.23) U	1.06 ± 0.687 (1.32) U	0.862 ± 0.496 (0.911) U	0.319 ± 0.352 (0.730) U	0.309 ± 0.390 (0.826) U	0.814 ± 0.430 (0.748)
Radium-226/228	TOTRAIUMCALCULATION	pCi/L	5	NE	1.18 ± 0.901 (1.37) U	1.21 ± 1.05 (1.99) U	1.38 ± 0.875 (1.34)	0.395 ± 0.845 (1.72) U	0.309 ± 0.841 (1.90) U	0.892 ± 1.03 (1.93) U
Semivolatile Organic Compounds – PAHs, Total										
Benzo(a)anthracene	SW8270C-SIM	ug/L	NE	0.03	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U
Benzo(a)pyrene	SW8270C-SIM	ug/L	0.2	0.025	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U
Benzo(b)fluoranthene	SW8270C-SIM	ug/L	NE	0.25	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U
Dibenzo(a,h)anthracene	SW8270C-SIM	ug/L	NE	0.025	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U	< 0.10 U
Volatile Organic Compounds, Total										
1,4-Dioxane	SW8260B_SIM	ug/L	NE	0.46	< 3.00 UJ	< 3.00 UJ	< 3.00 UJ	< 3.00 U	< 3.00 U	< 3.00 U
cis-1,2-Dichloroethene	SW8260C	ug/L	70	3.6	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U
Vinyl chloride	SW8260C	ug/L	2	0.019	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U

Notes:

ft BGS = feet below ground surface

ug/L = micrograms per liter

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MCLs are for combined radium-226-228 (5 pCi/L) and gross alpha

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J = Estimated concentration.

J+ = The result is an estimated concentration, but may be biased high.

J- = The result is an estimated concentration, but may be biased low.

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UJ = The analyte was analyzed for, but was not detected. The reporting limit is approximate and may be inaccurate or imprecise.

ATTACHMENT A – COMBINED LOG FOR MW-501

