INLAND EMPIRE
PAPER COMPANY
Papermakers since 1911.
3320 N. Argonne Spokane, WA 99212
509.924.1911 509.927.8461 FAX

March 1, 2021

Mr. Pat Hallinan, Water Quality Permit Coordinator
Eastern Regional Office
Washington State Department of Ecology
4601 North Monroe Street
Spokane, WA 99205-1265

Subject: Inland Empire Paper Company NPDES Permit No. WA 000082-5 Renewal

Dear Mr. Hallinan:

Enclosed you will find the completed application for renewal of Inland Empire Paper Company's (IEP) NPDES Permit No. 000082-5, including all supporting documents:

- Form 1 – General Information
- Form 2C - Existing Manufacturing, Commercial, Mining, and Silvicultural Operations
- Aquatic Toxicology Report (WET) for Winter 2021 Sample
- Anatek Labs, Conventional and Non-Conventional Pollutants, Part 1 of 2
- Anatek Labs, Conventional and Non-Conventional Pollutants, Part 2 of 2
- Waiver Request for COD & TOC
- IEP Site Plan
- IEP Topographical Location Map
- IEP Stormwater Runoff Plan
- IEP Water Balance

The effluent data submitted is based on performance from January through December 2020 to reflect the latest modernization projects implemented during the current permit cycle. Data from May through July is excluded since it is not representative of full-scale operation due to curtailment in IEP's operation because of the COVID pandemic.

In addition, IEP requests that Ecology consider and incorporate the following elements into IEP's forthcoming NPDES permit to provide reasonable assurance in meeting the final water quality based effluent limits (WQBELs) imposed under the Spokane River and Lake Spokane Dissolved Oxygen Total Maximum Daily Load (DO TMDL):

Delta Elimination Tools – IEP has applied for several delta elimination opportunities that are available under the DO TMDL. The DO TMDL and IEP's NPDES permit are very clear that delta-elimination actions are available to achieve compliance with the final WQBELs:

> *Final water quality-based effluent limits: Compliance with these limits will be determined by the effluent data combined with any approved offsets from the Delta Elimination Plan.* {DO TMDL at page 63}[1]

> *The delta elimination plan, in combination with the pollutant reduction from technology, shall provide reasonable assurance of meeting the Permittee's final WQBELs by June 1, 2021 (unless a longer compliance schedule becomes available under RCW 90.48.605).* {Permit No. WA-000082-5 at page 16}[2]

The opportunities that are being requested for inclusion in IEP's forthcoming permit are existing concepts that have already been applied in the settlement of the final DO TMDL, current or past NPDES permits for Spokane River dischargers, or are tools available under Ecology's existing rules. IEP has been researching and developing various nutrient reduction technologies for over 20 years and has a thorough understanding of what levels of nutrient reductions will be achievable with IEP's pulp and paper mill effluent. Based on this extensive experience, it is of utmost importance that these delta elimination tools are incorporated into the permit to provide IEP with certainty that it can achieve the final effluent limits imposed by the DO TMDL:

a. **River/Well NCCW Offset based on River/Well Testing** – Ecology committed to evaluate the continuity between the river and IEP's groundwater supply used for Non-Contact Cooling Water (NCCW), due to an oversight to include this flow in IEP's DO TMDL allocation. This commitment by Ecology to resolve this oversight was affirmed in a letter from former Ecology Director Ted Sturdevant:

> *I want to reaffirm that Ecology is committed to working with IEP on implementing specific requirements of the permit, including evaluating an allowance for nutrients in the facility's non-contact cooling water (NCCW). We are prepared to work with IEP to validate the relationship between NCCW and the river water quality. We will include an allowance in the next draft permit to the extent that concentrations in the groundwater supply for the NCCW are statistically equivalent to concentrations in the Spokane River upstream of the facility.*[3]

Ecology performed this study between 2012 and 2013 and completed the report in June 2016. The study confirmed continuity between the Spokane River and IEP's NCCW wells that are hydraulically connected to the river and in a demonstrated losing reach of the river:

[1] Spokane River and Lake Spokane Dissolved Oxygen Total Maximum Daily Load, Ecology Publication No. 07-10-073, Revised February 2010

[2] Inland Empire Paper Company NPDES Permit No. WA-000082-5, Permit Condition S5, Schedule of Compliance for Total Phosphorus, CBOD and Ammonia, September 29, 2011

[3] T. Sturdevant, Letter to Inland Empire Paper Company, September 29, 2011

Results of this 2012-2013 study support the following recommendations. A nutrient allowance should be considered by Ecology's Water Quality Program for the fraction of river phosphorus loads in the NCCW. This allowance should be the lesser of the two loads: observed NCCW loads and estimated fraction of river loads.[4]

Based on the findings of this report and Ecology's commitment, IEP requests that the nutrient allowance for IEP's NCCW be included in the forthcoming permit, as was acknowledged by former Director Sturdevant, and further confirmed by Ecology in their response to comments to IEP's amended draft permit:

After verifying the relationship between the NCCW supply well and upstream river water nutrient concentrations with a season's worth of sampling results, Ecology will include this allowance at the next permit renewal.[5]

b. **Nutrient Bubble with Kaiser Aluminum** - Section S5 of IEP's NPDES Permit allows for the use of a bubble limit towards meeting the final WQBEL's:

Implementation of a 'bubble limit' concept for interested Spokane River dischargers where the sum of all wasteload allocations becomes a cap or bubble. Under the bubble limit concept, a discharger is not considered in violation of their individual WQBEL, as long as the collective bubble limit is met during the same reporting period.[6]

Additionally, IEP and Kaiser Aluminum have historically operated under a bubble permit for Total Phosphorus in prior NPDES permits that were approved by both Ecology and EPA:

Spokane River Phosphorus Management Plan

The daily average aggregate discharge for total phosphorus (as P) shall not exceed 16.5 kg/day (36.4 lbs/day) during the time period from June 1 to October 31 for Inland Empire Paper Company and Kaiser Aluminum & Chemical Corporation, Trentwood Works.[7]

Under Ecology's and EPA's plan and direction, IEP and Kaiser have performed extensive modeling through LimnoTech that has demonstrated a linear response for both Total Phosphorus and CBOD[8][9]. IEP and Kaiser request that a bubble

[4] Inland Empire Paper Company Nutrients and Common Ions Source Water Study, Ecology Publication No. 16-03-023, June 2016

[5] Appendix D2 – Response to Comments for Amendment to Proposed NPDES Permit WA-0000825 Inland Empire Paper Company, November 22, 2011

[6] Inland Empire Paper Company NPDES Permit No. WA-000082-5, Permit Condition S5, Schedule of Compliance for Total Phosphorus, CBOD and Ammonia, September 29, 2011

[7] Inland Empire Paper Company NPDES Permit No. WA-000082-5, 1997 to 2002 and 2002 to 2007

[8] CBOD Bubble Permit Calculation for IEP and Kaiser, Memorandum from LimnoTech to Pat Hallinan (Ecology), February 8, 2020

permit for both Total Phosphorus and CBOD be incorporated into the permit for purposes of determining compliance with the DO TMDL.

c. Static Pollutant Equivalency Trade – in IEP's NPDES permit renewal application submitted on April 29, 2016 a request was made for alternate limits to the ammonia and $CBOD_5$ wasteload allocations established under the DO TMDL. IEP requests that this delta elimination tool be reserved for future consideration, as IEP is currently evaluating the performance of recent WWTS improvements on the abatement effectiveness of the nutrients regulated under the DO TMDL.

Polychlorinated Biphenyls (PCBs) – IEP has expended significant capital and resources to perform the PCB Source Identification Study[10] required under Condition S6.A. of IEP's current NPDES permit, completion of a water quality variance for PCBs,[11] and performance of a special study to support the Highest Attainable Condition for the water quality variance[12]. These comprehensive studies of IEP's facility conclusively confirm that the overwhelming source of PCBs entering IEP's facility originates from the inks and pigments associated with the recycling of waste paper products. The source of these PCBs is very well documented as originating from inadvertent generation during the chemical manufacturing process of these pigments. EPA has specifically recognized this source of PCBs and provided an allowance of up to 50 ppm for their manufacture since the inception of the Toxics Substance Control Act (TSCA):

> *(g) Pigments. Diarylide and Phthalocyanin pigments that contain 50 ppm or greater PCB may be processed, distributed in commerce, and used in a manner other than a totally enclosed manner until January 1, 1982, except that after July 1, 1979, processing and distribution in commerce of diarylide or phthalocyanin pigments that contain 50 ppm or greater PCB is permitted only for persons who are granted an exemption under TSCA section 6(e)(3)(B).* {40 C.F.R. § 761.3 (g) up to the 1999 revision of the C.F.R., thereafter paragraph (g) is reserved}

This allowance is nearly 300 million times higher than the Washington Human Health Water Quality Criteria (HHWQC) of 170 pg/L for PCBs and over 38 billion times higher than the Spokane Tribe of Indians HHWQC of 1.37 pg/L approved by EPA.

IEP's business is built upon environmental stewardship and sustainability of resources that includes the use of waste or residual materials in the manufacture of its products. This includes the recycling of various streams of waste paper from as far as 1,500 miles from the mill's

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[9] TP Bubble Permit Calculation for IEP and Kaiser, Memorandum from LimnoTech to Pat Hallinan (Ecology), January 22, 2020

[10] Inland Empire Paper Company NPDES Permit No. WA-000082-5, Permit Condition S6.A, PCB Best Management Practices Plan, PCB Source Identification Study, September 29, 2011

[11] Variance Application for Inland Empire Paper Company NPDES Permit No. WA 000082-5, Submitted to Ecology April 30, 2019

[12] Quality Assurance Project Plan Compilation of PCBs Dataset to Support the Highest Attainable Condition for a Water Quality Variance, February 2020

location in Spokane. IEP has no control over the source, use and magnitude of PCB laden pigments within the waste paper arriving at our facility.

IEP has the most advanced wastewater treatment system (WWTS) in the pulp & paper industry that is very efficient in removing PCBs in recycled paper products. IEP has been able to achieve more than 99% reduction of PCBs through improvements to its WWTS, including the installation of a state-of-the-art ultrafiltration membrane tertiary treatment system in 2020. Additionally, the PCBs removed by IEP's WWTS are completely destroyed through thermal destruction in a fluidized bed combustion system, so the potential of any future contamination of the environment is eliminated. Since IEP has no control over the source of PCBs coming into its facility due to the TSCA allowance, our Best Management Practices are limited to wastewater treatment system improvements, or the elimination of recycling of waste paper. There are currently no known technologies to remove PCBs to the level of the HHWQC standard for PCBs, so the elimination of recycling is the only remaining option for reducing PCBs.

There are significant environmental benefits from the recycling of waste paper that include conservation of natural resources, energy savings, reductions in greenhouse gas emissions, reductions in landfill space, and the removal and destruction of PCBs. The overall effect of eliminating recycling would have significant consequences for IEP in addition to negating the environmental benefits described above. IEP would cease to have the capability of providing a finished paper product with recycled content and would lose this market share. An increase in virgin wood fiber would be needed to supplant the loss of recycled paper as a raw material. IEP installed its integrated recycling facility in 1991 due to environmental demands and paradoxically it is environmental regulations that now threaten the future of recycling.

EPA and Ecology need to resolve the significant conflict between the TSCA regulations and the water quality standards for PCBs and until that time provide regulatory protections to preserve industries such as recycling that are impacted by this unreasonable regulatory discrepancy. IEP has no control over these PCBs and EPA has stated that it deems these authorized levels of PCBs to be safe for human health and the environment.

IEP supports extension of the existing narrative permit conditions to address PCB issues in the Spokane River. The central component of the existing permit has been the successful efforts of the Spokane River Regional Toxics Task Force (SRRTTF). The SRRTTF has been a national model for identifying and reducing PCB loading to the Spokane River and beyond. Significant success has been achieved through these efforts and the advanced wastewater treatment improvements at IEP and other facilities discharging to the river. IEP has also led the efforts within the SRRTTF to push for TSCA reform to reduce the allowable levels of inadvertent PCB concentrations in manufactured products and to promote PCB-free commercial and industrial products. Ecology should not risk the demise of the SRTTFF by imposing a numeric water quality based effluent limit (WQBEL) for PCBs in the next permit.

IEP objects in any case to the inclusion of a numeric WQBEL for PCBs in its next permit since there is no evidence that IEP's effluent has the potential or is causing or contributing to a violation of the applicable PCB criterion. First, PCBs are not detectable in IEP's effluent using approved PCB test methods as documented in the priority pollutant test results submitted with the enclosed application for permit renewal. Ecology should rely on this data as it does with

NPDES permits throughout the state of Washington to determine if a chemical such as PCBs is a pollutant of concern for NPDES permit effluent limitations. Ecology regulations unequivocally state that "in applying the appropriate water quality criteria for a water body, the department will use the following procedures." WAC 173-201A-260(3). This section further states that "the analytical testing methods for these numeric criteria ***must*** be in accordance with [40 CFR Part 136]." WAC 173-201A-260(3)(h). The PCB sampling data reported in the permit application was obtained using the only approved PCB test method and data from that test method is the only data Ecology is legally authorized to use under EPA and its own regulations for conducting a reasonable potential analysis and deriving numeric effluent limits.

Second, even if Ecology uses data from the unapproved EPA test method 1668C for PCBs, the data is conclusive that the river is meeting the PCB surface water criterion of 170 pg/L. The SRRTTF Comprehensive Plan, which has been approved by Ecology, includes documentation on PCB concentrations in the Spokane River water column from Lake Coeur d'Alene to Nine Mile Dam. The arithmetic and geometric mean of this data is all below 170 pg/L. This data was reported using a blank correction factor of 3X under a quality assurance project plan aimed at deriving a semi-quantitative loading estimate of PCBs in the river. EPA guidance and the Ecology Water Quality Permit Writers Manual (2018) require the use of a blank censoring factor of 10X when using EPA method 1668C for evaluating reasonable potential.[13] When SRRTTF data is adjusted using a 10X blank censoring, the geometric mean of the PCB data throughout the Spokane River is even further below the PCB criterion of 170 pg/L.

Ecology should not use fish tissue data to justify a narrative reasonable potential analysis that IEP is causing or contributing to a narrative water quality standard. First, fish tissue concentration data is only used under a unique Ecology water quality policy for Section 303(d) impairment listings. The equivalent PCB tissue concentration used under this policy is not a water quality standard. Second, fish are exposed to PCBs through many pathways, including the water column, sediments, food sources, and the exposure pathways of their food sources. Fish tissue data, particularly in the Spokane River, is retrospective and may reflect only historical conditions, considering that data collected over thirty years ago from fish that may have been over twenty years old is the basis for impairment listings on the Spokane River.

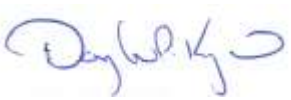
Third, Ecology has not established a link between PCBs in point source discharges, including the congener-level data available under Method 1668C, and any relevant fish data. There is no scientific basis for a generalized assumption that PCBs present in IEP effluent are causing or contributing to elevated fish tissue concentrations.

For these reasons, IEP encourages Ecology to continue the current narrative conditions to control and reduce PCB loading to the Spokane River without a numeric WQBEL for PCBs.

[13] WA Department of Ecology, Water Quality Program Permit Writer's Manual, 2018, at 231, https://fortress.wa.gov/ecy/publications/summarypages/92109.html

Please contact me should you have any questions or require additional information regarding this submittal.

Sincerely,



Douglas P. Krapas
Environmental Manager

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
WAD009069279	WA-000082-5	Inland Empire Paper Company	

Form 2C NPDES

U.S. Environmental Protection Agency
Application for NPDES Permit to Discharge Wastewater
EXISTING MANUFACTURING, COMMERCIAL, MINING, AND SILVICULTURE OPERATIONS

SECTION 1. OUTFALL LOCATION (40 CFR 122.21(g)(1))

Outfall Location

1.1 Provide information on each of the facility's outfalls in the table below.

Outfall Number	Receiving Water Name	Latitude	Longitude
001	Spokane River	47° 41′ ″ N	117° 16′ ″ W
		° ′ ″	° ′ ″
		° ′ ″	° ′ ″

SECTION 2. LINE DRAWING (40 CFR 122.21(g)(2))

Line Drawing

2.1 Have you attached a line drawing to this application that shows the water flow through your facility with a water balance? (See instructions for drawing requirements. See Exhibit 2C–1 at end of instructions for example.)

☑ Yes ☐ No

SECTION 3. AVERAGE FLOWS AND TREATMENT (40 CFR 122.21(g)(3))

Average Flows and Treatment

3.1 For each outfall identified under Item 1.1, provide average flow and treatment information. Add additional sheets if necessary.

****Outfall Number**** 001

Operations Contributing to Flow

Operation	Average Flow
Treated Wastewater from Pulp & Paper Manufacturing	2.6 mgd
Non-Contact Cooling Water (NCCW)	3.3 mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Table 2C-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
Primary Screening, Pre-aeration, Sedimentation,	1-T, 3-E, 1-U	5-Q
Reuse/Recycle of Treated Effluent, Stabilization Ponds,	4-C, 3-G	
Moving Bed Filters, Activated Sludge, Sedimentation	1-P, 3-A, 1-U	
Microstraining, Discharge to Surface Waters	1-N, 4-A	

Average Flows and Treatment Continued

3.1 cont.

****Outfall Number**** _____

Operations Contributing to Flow

Operation	Average Flow
	mgd
	mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Table 2C-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
Floatation Thickening/Gravity Thickening	5-J/5-L	
Incineration and Land Application	5-O	5-Q

****Outfall Number**** _____

Operations Contributing to Flow

Operation	Average Flow
	mgd
	mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Table 2C-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge

System Users

3.2 Are you applying for an NPDES permit to operate a privately owned treatment works?

☑ Yes ☐ No → SKIP to Section 4.

3.3 Have you attached a list that identifies each user of the treatment works?

☐ Yes ☑ No

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
WAD009069279	WA-000082-5	Inland Empire Paper Company	

SECTION 4. INTERMITTENT FLOWS (40 CFR 122.21(g)(4))

Intermittent Flows

4.1 Except for storm runoff, leaks, or spills, are any discharges described in Sections 1 and 3 intermittent or seasonal?

☐ Yes ☑ No ➔ SKIP to Section 5.

4.2 Provide information on intermittent or seasonal flows for each applicable outfall. Attach additional pages, if necessary.

Outfall Number	Operation (list)	Frequency		Flow Rate		Duration
		Average Days/Week	Average Months/Year	Long-Term Average	Maximum Daily	
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days

SECTION 5. PRODUCTION (40 CFR 122.21(g)(5))

Applicable ELGs

5.1 Do any effluent limitation guidelines (ELGs) promulgated by EPA under Section 304 of the CWA apply to your facility?

☑ Yes ☐ No ➔ SKIP to Section 6.

5.2 Provide the following information on applicable ELGs.

ELG Category	ELG Subcategory	Regulatory Citation
Industrial	Mechanical Pulp, Subpart G	40 CFR 430, Subpart G
Industrial	Secondary Fiber Deink, Subpart I	40 CFR 430, Subpart I

Production-Based Limitations

5.3 Are any of the applicable ELGs expressed in terms of production (or other measure of operation)?

☑ Yes ☐ No ➔ SKIP to Section 6.

5.4 Provide an actual measure of daily production expressed in terms and units of applicable ELGs.

Outfall Number	Operation, Product, or Material	Quantity per Day	Unit of Measure
001	Groundwood, Thermo-Mechanical Pulp (TMP), Subpart G	475	BDTPD
001	Deink Pulp - Old Newsprint (ONP), Subpart I	350	BDTPD

SECTION 6. IMPROVEMENTS (40 CFR 122.21(g)(6))

Upgrades and Improvements

6.1 Are you presently required by any federal, state, or local authority to meet an implementation schedule for constructing, upgrading, or operating wastewater treatment equipment or practices or any other environmental programs that could affect the discharges described in this application?

☑ Yes ☐ No ➔ SKIP to Item 6.3.

6.2 Briefly identify each applicable project in the table below.

Brief Identification and Description of Project	Affected Outfalls (list outfall number)	Source(s) of Discharge	Final Compliance Dates	
			Required	Projected
Dissolved Oxygen TMDL	001	Process Wastewater	11/01/2021	11/01/2021

6.3 Have you attached sheets describing any additional water pollution control programs (or other environmental projects that may affect your discharges) that you now have underway or planned? *(optional item)*

☐ Yes ☑ No ☐ Not applicable

SECTION 7. EFFLUENT AND INTAKE CHARACTERISTICS (40 CFR 122.21(g)(7))

Effluent and Intake Characteristics

See the instructions to determine the pollutants and parameters you are required to monitor and, in turn, the tables you must complete. Not all applicants need to complete each table.

Table A. Conventional and Non-Conventional Pollutants

7.1 Are you requesting a waiver from your NPDES permitting authority for one or more of the Table A pollutants for any of your outfalls?

☑ Yes ☐ No ➔ SKIP to Item 7.3.

7.2 If yes, indicate the applicable outfalls below. Attach waiver request and other required information to the application.

Outfall Number 001 Outfall Number _____ Outfall Number _____

7.3 Have you completed monitoring for all Table A pollutants at each of your outfalls for which a waiver has not been requested and attached the results to this application package?

☑ Yes ☐ No; a waiver has been requested from my NPDES permitting authority for all pollutants at all outfalls.

Table B. Toxic Metals, Cyanide, Total Phenols, and Organic Toxic Pollutants

7.4 Do any of the facility's processes that contribute wastewater fall into one or more of the primary industry categories listed in Exhibit 2C-3? (See end of instructions for exhibit.)

☑ Yes ☐ No ➔ SKIP to Item 7.8.

7.5 Have you checked "Testing Required" for all toxic metals, cyanide, and total phenols in Section 1 of Table B?

☑ Yes ☐ No

7.6 List the applicable primary industry categories and check the boxes indicating the required GC/MS fraction(s) identified in Exhibit 2C-3.

Primary Industry Category	Required GC/MS Fraction(s) (Check applicable boxes.)			
Pulp and Paperboard Mills	☑ Volatile	☑ Acid	☑ Base/Neutral	☑ Pesticide
	☐ Volatile	☐ Acid	☐ Base/Neutral	☐ Pesticide
	☐ Volatile	☐ Acid	☐ Base/Neutral	☐ Pesticide

Effluent and Intake Characteristics Continued

7.7	Have you checked "Testing Required" for all required pollutants in Sections 2 through 5 of Table B for each of the GC/MS fractions checked in Item 7.6? ☑ Yes ☐ No
7.8	Have you checked "Believed Present" or "Believed Absent" for all pollutants listed in Sections 1 through 5 of Table B where testing is not required? ☑ Yes ☐ No
7.9	Have you provided (1) quantitative data for those Section 1, Table B, pollutants for which you have indicated testing is required or (2) quantitative data or other required information for those Section 1, Table B, pollutants that you have indicated are "Believed Present" in your discharge? ☑ Yes ☐ No
7.10	Does the applicant qualify for a small business exemption under the criteria specified in the instructions? ☐ Yes ➔ Note that you qualify at the top of Table B, then SKIP to Item 7.12. ☑ No
7.11	Have you provided (1) quantitative data for those Sections 2 through 5, Table B, pollutants for which you have determined testing is required or (2) quantitative data or an explanation for those Sections 2 through 5, Table B, pollutants you have indicated are "Believed Present" in your discharge? ☑ Yes ☐ No
Table C. Certain Conventional and Non-Conventional Pollutants	
7.12	Have you indicated whether pollutants are "Believed Present" or "Believed Absent" for all pollutants listed on Table C for all outfalls? ☑ Yes ☐ No
7.13	Have you completed Table C by providing (1) quantitative data for those pollutants that are limited either directly or indirectly in an ELG and/or (2) quantitative data or an explanation for those pollutants for which you have indicated "Believed Present"? ☑ Yes ☐ No
Table D. Certain Hazardous Substances and Asbestos	
7.14	Have you indicated whether pollutants are "Believed Present" or "Believed Absent" for all pollutants listed in Table D for all outfalls? ☑ Yes ☐ No
7.15	Have you completed Table D by (1) describing the reasons the applicable pollutants are expected to be discharged and (2) by providing quantitative data, if available? ☑ Yes ☐ No
Table E. 2,3,7,8-Tetrachlorodibenzo-p-Dioxin (2,3,7,8-TCDD)	
7.16	Does the facility use or manufacture one or more of the 2,3,7,8-TCDD congeners listed in the instructions, or do you know or have reason to believe that TCDD is or may be present in the effluent? ☐ Yes ➔ Complete Table E. ☑ No ➔ SKIP to Section 8.
7.17	Have you completed Table E by reporting *qualitative* data for TCDD? ☐ Yes ☐ No

SECTION 8. USED OR MANUFACTURED TOXICS (40 CFR 122.21(g)(9))

Used or Manufactured Toxics

8.1	Is any pollutant listed in Table B a substance or a component of a substance used or manufactured at your facility as an intermediate or final product or byproduct? ☐ Yes ☑ No ➔ SKIP to Section 9.
8.2	List the pollutants below. 1. 4. 7. 2. 5. 8. 3. 6. 9.

SECTION 9. BIOLOGICAL TOXICITY TESTS (40 CFR 122.21(g)(11))

Biological Toxicity Tests

9.1 Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made within the last three years on (1) any of your discharges or (2) on a receiving water in relation to your discharge?

☑ Yes ☐ No → SKIP to Section 10.

9.2 Identify the tests and their purposes below.

Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?	Date Submitted
Whole Effluent Toxicity Acute & Chronic	NPDES Permit Application	☑ Yes ☐ No	03/01/2021
		☐ Yes ☐ No	
		☐ Yes ☐ No	

SECTION 10. CONTRACT ANALYSES (40 CFR 122.21(g)(12))

Contract Analyses

10.1 Were any of the analyses reported in Section 7 performed by a contract laboratory or consulting firm?

☑ Yes ☐ No → SKIP to Section 11.

10.2 Provide information for each contract laboratory or consulting firm below.

	Laboratory Number 1	Laboratory Number 2	Laboratory Number 3
Name of laboratory/firm	Anatek Labs, Inc.		
Laboratory address	504 E. Sprague Ave #D		
Phone number	(509) 838-3999		
Pollutant(s) analyzed	Table B and Table C		

SECTION 11. ADDITIONAL INFORMATION (40 CFR 122.21(g)(13))

Additional Information

11.1 Has the NPDES permitting authority requested additional information?

☑ Yes ☐ No → SKIP to Section 12.

11.2 List the information requested and attach it to this application.

1. Whole Effluent Toxicity (once in last summer and once in the last winter). Winter results are included with
2.
3.
4.
5.
6.

SECTION 12. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))

Checklist and Certification Statement

12.1 In Column 1 below, mark the sections of Form 2C that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to complete all sections or provide attachments.

Column 1	Column 2	
☑ Section 1: Outfall Location	☑ w/ attachments	
☑ Section 2: Line Drawing	☑ w/ line drawing	☐ w/ additional attachments
☑ Section 3: Average Flows and Treatment	☐ w/ attachments	☐ w/ list of each user of privately owned treatment works
☐ Section 4: Intermittent Flows	☐ w/ attachments	
☑ Section 5: Production	☐ w/ attachments	
☑ Section 6: Improvements	☐ w/ attachments	☐ w/ optional additional sheets describing any additional pollution control plans
☑ Section 7: Effluent and Intake Characteristics	☐ w/ request for a waiver and supporting information ☐ w/ small business exemption request ☑ w/ Table A ☑ w/ Table C ☑ w/ Table E	☐ w/ explanation for identical outfalls ☐ w/ other attachments ☑ w/ Table B ☑ w/ Table D ☑ w/ analytical results as an attachment
☑ Section 8: Used or Manufactured Toxics	☐ w/ attachments	
☑ Section 9: Biological Toxicity Tests	☑ w/ attachments	
☑ Section 10: Contract Analyses	☐ w/ attachments	
☑ Section 11: Additional Information	☐ w/ attachments	
☑ Section 12: Checklist and Certification Statement	☐ w/ attachments	

12.2 **Certification Statement**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (print or type first and last name)	Official title
Kevin D. Rasler	President and General Manager
Signature	**Date signed**
	03/01/2021

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
WAD009069279	WA-0000825	Inland Empire Paper Company	001

Form Approved 03/05/19
OMB No. 2040-0004

TABLE A. CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(iii)) [1]

	Pollutant	Waiver Requested (if applicable)	Units (specify)		Effluent: Maximum Daily Discharge (required)	Effluent: Maximum Monthly Discharge (if available)	Effluent: Long-Term Average Daily Discharge (if available)	Effluent: Number of Analyses	Intake (Optional): Long-Term Average Value	Intake (Optional): Number of Analyses
☐	Check here if you have applied to your NPDES permitting authority for a waiver for *all* of the pollutants listed on this table for the noted outfall.									
1.	Biochemical oxygen demand (BOD_5)	☐	Concentration	mg/L	10.2	4.2	3.4	175		
			Mass	lb/day	537	206	157	175		
2.	Chemical oxygen demand (COD)	☑	Concentration							
			Mass							
3.	Total organic carbon (TOC)	☑	Concentration							
			Mass							
4.	Total suspended solids (TSS)	☐	Concentration	mg/L	8.0	3.1	1.4	242		
			Mass	lb/day	445	95	52	242		
5.	Ammonia (as N)	☐	Concentration	mg/L	3.42	0.78	0.30	60		
			Mass	lb/day	140.6	29.3	12.7	60		
6.	Flow	☐	Rate	MGD	8.43	6.96	5.91	274		
7.	Temperature (winter)	☐	°C	°C	26	25	24	121		
	Temperature (summer)	☐	°C	°C	29	26	24	153		
8.	pH (minimum)	☐	Standard units	s.u.	6.3	7.2	7.4	274		
	pH (maximum)	☐	Standard units	s.u.	9.7	8.1	7.6	274		

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
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Form Approved 03/05/19
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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)	Effluent				Intake (optional)	
			Believed Present	Believed Absent		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
☐	Check here if you qualify as a small business per the instructions to Form 2C and, therefore, do not need to submit quantitative data for any of the organic toxic pollutants in Sections 2 through 5 of this table. Note, however, that you must still indicate in the appropriate column of this table if you believe any of the pollutants listed are present in your discharge.										
Section 1. Toxic Metals, Cyanide, and Total Phenols											
1.1	Antimony, total (7440-36-0)	☑	☑	☐	Concentration	mg/L	0.00265			1	
					Mass						
1.2	Arsenic, total (7440-38-2)	☑	☑	☐	Concentration	mg/L	0.00297			1	
					Mass						
1.3	Beryllium, total (7440-41-7)	☑	☐	☑	Concentration	mg/L	ND			1	
					Mass						
1.4	Cadmium, total (7440-43-9)	☑	☐	☑	Concentration	mg/L	ND	ND	ND	9	
					Mass						
1.5	Chromium, total (7440-47-3)	☑	☐	☐	Concentration	mg/L	ND			1	
					Mass						
1.6	Copper, total (7440-50-8)	☑	☑	☐	Concentration	mg/L	0.00434			1	
					Mass						
1.7	Lead, total (7439-92-1)	☑	☐	☑	Concentration	ug/L	1.2	1.2	ND	9	
					Mass						
1.8	Mercury, total (7439-97-6)	☑	☑	☐	Concentration	ug/L	0.00567			1	
					Mass						
1.9	Nickel, total (7440-02-0)	☑	☑	☐	Concentration	mg/L	0.00205			1	
					Mass						
1.10	Selenium, total (7782-49-2)	☑	☐	☑	Concentration	mg/L	ND			1	
					Mass						
1.11	Silver, total (7440-22-4)	☐	☐	☑	Concentration	mg/L	ND			1	
					Mass						

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
1.12	Thallium, total (7440-28-0)	☑	☐	☑	Concentration	mg/L	ND			1		
					Mass							
1.13	Zinc, total (7440-66-6)	☑	☑	☐	Concentration	ug/L	115	115	83.7	8		
					Mass							
1.14	Cyanide, total (57-12-5)	☑	☑	☐	Concentration	mg/L	0.612			1		
					Mass							
1.15	Phenols, total	☑	☐	☑	Concentration	mg/L	ND			1		
					Mass							
Section 2. Organic Toxic Pollutants (GC/MS Fraction—Volatile Compounds)												
2.1	Acrolein (107-02-8)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.2	Acrylonitrile (107-13-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.3	Benzene (71-43-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.4	Bromoform (75-25-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.5	Carbon tetrachloride (56-23-5)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.6	Chlorobenzene (108-90-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.7	Chlorodibromomethane (124-48-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.8	Chloroethane (75-00-3)	☑	☐	☐	Concentration	ug/L	ND			1		
					Mass							

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
2.9	2-chloroethylvinyl ether (110-75-8)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.10	Chloroform (67-66-3)	☑	☑	☐	Concentration	ug/L	1.06			1		
					Mass							
2.11	Dichlorobromomethane (75-27-4)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.12	1,1-dichloroethane (75-34-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.13	1,2-dichloroethane (107-06-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.14	1,1-dichloroethylene (75-35-4)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.15	1,2-dichloropropane (78-87-5)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.16	1,3-dichloropropylene (542-75-6)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.17	Ethylbenzene (100-41-4)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.18	Methyl bromide (74-83-9)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.19	Methyl chloride (74-87-3)	☑	☑	☐	Concentration	ug/L	1.56			1		
					Mass							
2.20	Methylene chloride (75-09-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.21	1,1,2,2- tetrachloroethane (79-34-5)	☑	☐	☐	Concentration	ug/L	ND			1		
					Mass							

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
2.22	Tetrachloroethylene (127-18-4)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.23	Toluene (108-88-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.24	1,2-trans-dichloroethylene (156-60-5)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.25	1,1,1-trichloroethane (71-55-6)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.26	1,1,2-trichloroethane (79-00-5)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.27	Trichloroethylene (79-01-6)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
2.28	Vinyl chloride (75-01-4)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
Section 3. Organic Toxic Pollutants (GC/MS Fraction—Acid Compounds)												
3.1	2-chlorophenol (95-57-8)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
3.2	2,4-dichlorophenol (120-83-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
3.3	2,4-dimethylphenol (105-67-9)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
3.4	4,6-dinitro-o-cresol (534-52-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
3.5	2,4-dinitrophenol (51-28-5)	☑	☐	☐	Concentration	ug/L	ND			1		
					Mass							

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
3.6	2-nitrophenol (88-75-5)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
3.7	4-nitrophenol (100-02-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
3.8	p-chloro-m-cresol (59-50-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
3.9	Pentachlorophenol (87-86-5)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
3.10	Phenol (108-95-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
3.11	2,4,6-trichlorophenol (88-05-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
Section 4. Organic Toxic Pollutants (GC/MS Fraction—Base /Neutral Compounds)												
4.1	Acenaphthene (83-32-9)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.2	Acenaphthylene (208-96-8)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.3	Anthracene (120-12-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.4	Benzidine (92-87-5)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.5	Benzo (a) anthracene (56-55-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.6	Benzo (a) pyrene (50-32-8)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.7	3,4-benzofluoranthene (205-99-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.8	Benzo (ghi) perylene (191-24-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.9	Benzo (k) fluoranthene (207-08-9)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.10	Bis (2-chloroethoxy) methane (111-91-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.11	Bis (2-chloroethyl) ether (111-44-4)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.12	Bis (2-chloroisopropyl) ether (102-80-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.13	Bis (2-ethylhexyl) phthalate (117-81-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.14	4-bromophenyl phenyl ether (101-55-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.15	Butyl benzyl phthalate (85-68-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.16	2-chloronaphthalene (91-58-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.17	4-chlorophenyl phenyl ether (7005-72-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.18	Chrysene (218-01-9)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.19	Dibenzo (a,h) anthracene (53-70-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.20	1,2-dichlorobenzene (95-50-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.21	1,3-dichlorobenzene (541-73-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.22	1,4-dichlorobenzene (106-46-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.23	3,3-dichlorobenzidine (91-94-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.24	Diethyl phthalate (84-66-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.25	Dimethyl phthalate (131-11-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.26	Di-n-butyl phthalate (84-74-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.27	2,4-dinitrotoluene (121-14-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.28	2,6-dinitrotoluene (606-20-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.29	Di-n-octyl phthalate (117-84-0)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.30	1,2-Diphenylhydrazine (as azobenzene) (122-66-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.31	Fluoranthene (206-44-0)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.32	Fluorene (86-73-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.33	Hexachlorobenzene (118-74-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.34	Hexachlorobutadiene (87-68-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.35	Hexachlorocyclopentadiene (77-47-4)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.36	Hexachloroethane (67-72-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.37	Indeno (1,2,3-cd) pyrene (193-39-5)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.38	Isophorone (78-59-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.39	Naphthalene (91-20-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.40	Nitrobenzene (98-95-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.41	N-nitrosodimethylamine (62-75-9)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.42	N-nitrosodi-n-propylamine (621-64-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.43	N-nitrosodiphenylamine (86-30-6)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.44	Phenanthrene (85-01-8)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
4.45	Pyrene (129-00-0)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.46	1,2,4-trichlorobenzene (120-82-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
Section 5. Organic Toxic Pollutants (GC/MS Fraction—Pesticides)												
5.1	Aldrin (309-00-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.2	α-BHC (319-84-6)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.3	β-BHC (319-85-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.4	γ-BHC (58-89-9)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.5	δ-BHC (319-86-8)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.6	Chlordane (57-74-9)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.7	4,4'-DDT (50-29-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.8	4,4'-DDE (72-55-9)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.9	4,4'-DDD (72-54-8)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.10	Dieldrin (60-57-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.11	α-endosulfan (115-29-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
5.12	β-endosulfan (115-29-7)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.13	Endosulfan sulfate (1031-07-8)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.14	Endrin (72-20-8)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.15	Endrin aldehyde (7421-93-4)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.16	Heptachlor (76-44-8)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.17	Heptachlor epoxide (1024-57-3)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.18	PCB-1242 (53469-21-9)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.19	PCB-1254 (11097-69-1)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.20	PCB-1221 (11104-28-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.21	PCB-1232 (11141-16-5)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.22	PCB-1248 (12672-29-6)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.23	PCB-1260 (11096-82-5)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							
5.24	PCB-1016 (12674-11-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
5.25	Toxaphene (8001-35-2)	☑	☐	☑	Concentration	ug/L	ND			1		
					Mass							

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
WAD009069279	WA-0000825	Inland Empire Paper Company	001

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TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)	Effluent					Intake (Optional)	
		Believed Present	Believed Absent		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses		Long-Term Average Value	Number of Analyses
☐	Check here if you believe all pollutants on Table C to be ***present*** in your discharge from the noted outfall. You need *not* complete the "Presence or Absence" column of Table C for *each* pollutant.										
☐	Check here if you believe all pollutants on Table C to be ***absent*** in your discharge from the noted outfall. You need *not* complete the "Presence or Absence" column of Table C for *each* pollutant.										
1.	Bromide (24959-67-9)	☐	☑	Concentration	mg/L	ND			1		
				Mass							
2.	Chlorine, total residual	☐	☑	Concentration	mg/L	ND			1		
				Mass							
3.	Color	☑	☐	Concentration	Color	250			1		
				Mass							
4.	Fecal coliform	☐	☑	Concentration	mg/L	ND			1		
				Mass							
5.	Fluoride (16984-48-8)	☐	☑	Concentration	mg/L	ND			1		
				Mass							
6	Nitrate-nitrite	☑	☐	Concentration	mg/L	0.306			1		
				Mass							
7.	Nitrogen, total organic (as N)	☑	☐	Concentration	mg/L	2.81			1		
				Mass							
8.	Oil and grease	☑	☐	Concentration	mg/L	14.4 (HEM)			1		
				Mass							
9.	Phosphorus (as P), total (7723-14-0)	☑	☐	Concentration	mg/L	0.60	0.21	0.12	70		
				Mass	lb/day	24.8	10.1	5.9	70		
10.	Sulfate (as SO_4) (14808-79-8)	☑	☐	Concentration	mg/L	96			1		
				Mass							
11.	Sulfide (as S)	☐	☑	Concentration	mg/L	ND			1		
				Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
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TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)		Effluent				Intake (Optional)	
		Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
12.	Sulfite (as SO_3) (14265-45-3)	☐	☑	Concentration	mg/L	ND			1		
				Mass							
13.	Surfactants	☑	☐	Concentration	mg/L	0.130 (MBAS)			1		
				Mass							
14.	Aluminum, total (7429-90-5)	☑	☐	Concentration	mg/L	0.0770			1		
				Mass							
15.	Barium, total (7440-39-3)	☑	☐	Concentration	mg/L	0.0749			1		
				Mass							
16.	Boron, total (7440-42-8)	☑	☐	Concentration	mg/L	0.0340			1		
				Mass							
17.	Cobalt, total (7440-48-4)	☐	☑	Concentration	mg/L	ND			1		
				Mass							
18.	Iron, total (7439-89-6)	☑	☐	Concentration	mg/L	0.0726			1		
				Mass							
19.	Magnesium, total (7439-95-4)	☑	☐	Concentration	mg/L	7.34			1		
				Mass							
20.	Molybdenum, total (7439-98-7)	☑	☐	Concentration	mg/L	0.00225			1		
				Mass							
21.	Manganese, total (7439-96-5)	☑	☐	Concentration	mg/L	0.693			1		
				Mass							
22.	Tin, total (7440-31-5)	☐	☑	Concentration	mg/L	ND			1		
				Mass							
23.	Titanium, total (7440-32-6)	☐	☑	Concentration	mg/L	ND			1		
				Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
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TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)		Effluent				Intake (Optional)	
		Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
24.	**Radioactivity**										
	Alpha, total	☑	☐	Concentration	pCi/L	10.6			1		
				Mass							
	Beta, total	☑	☐	Concentration	pCi/L	12.5			1		
				Mass							
	Radium, total	☑	☐	Concentration	pCi/L	4.13			1		
				Mass							
	Radium 226, total	☐	☑	Concentration	pCi/L	ND			1		
				Mass							

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
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TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
1.	Asbestos	☐	☑		
2.	Acetaldehyde	☐	☑		
3.	Allyl alcohol	☐	☑		
4.	Allyl chloride	☐	☑		
5.	Amyl acetate	☐	☑		
6.	Aniline	☐	☑		
7.	Benzonitrile	☐	☑		
8.	Benzyl chloride	☐	☑		
9.	Butyl acetate	☐	☑		
10.	Butylamine	☐	☑		
11.	Captan	☐	☑		
12.	Carbaryl	☐	☑		
13.	Carbofuran	☐	☑		
14.	Carbon disulfide	☐	☑		
15.	Chlorpyrifos	☐	☑		
16.	Coumaphos	☐	☑		
17.	Cresol	☐	☑		
18.	Crotonaldehyde	☐	☑		
19.	Cyclohexane	☐	☑		

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
20.	2,4-D (2,4-dichlorophenoxyacetic acid)	☐	☑		
21.	Diazinon	☐	☑		
22.	Dicamba	☐	☑		
23.	Dichlobenil	☐	☑		
24.	Dichlone	☐	☑		
25.	2,2-dichloropropionic acid	☐	☑		
26.	Dichlorvos	☐	☑		
27.	Diethyl amine	☐	☑		
28.	Dimethyl amine	☐	☑		
29.	Dintrobenzene	☐	☑		
30.	Diquat	☐	☑		
31.	Disulfoton	☐	☑		
32.	Diuron	☐	☑		
33.	Epichlorohydrin	☐	☑		
34.	Ethion	☐	☑		
35.	Ethylene diamine	☐	☑		
36.	Ethylene dibromide	☐	☑		
37.	Formaldehyde	☐	☑		
38.	Furfural	☐	☑		

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
39.	Guthion	☐	☑		
40.	Isoprene	☐	☑		
41.	Isopropanolamine	☐	☑		
42.	Kelthane	☐	☑		
43.	Kepone	☐	☑		
44.	Malathion	☐	☑		
45.	Mercaptodimethur	☐	☑		
46.	Methoxychlor	☐	☑		
47.	Methyl mercaptan	☐	☑		
48.	Methyl methacrylate	☐	☑		
49.	Methyl parathion	☐	☑		
50.	Mevinphos	☐	☑		
51.	Mexacarbate	☐	☑		
52.	Monoethyl amine	☐	☑		
53.	Monomethyl amine	☐	☑		
54.	Naled	☐	☑		
55.	Naphthenic acid	☐	☑		
56.	Nitrotoluene	☐	☑		
57.	Parathion	☐	☑		

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
58.	Phenolsulfonate	☐	☑		
59.	Phosgene	☐	☑		
60.	Propargite	☐	☑		
61.	Propylene oxide	☐	☑		
62.	Pyrethrins	☐	☑		
63.	Quinoline	☐	☑		
64.	Resorcinol	☐	☑		
65.	Strontium	☐	☑		
66.	Strychnine	☐	☑		
67.	Styrene	☐	☑		
68.	2,4,5-T (2,4,5-trichlorophenoxyacetic acid)	☐	☑		
69.	TDE (tetrachlorodiphenyl ethane)	☐	☑		
70.	2,4,5-TP [2-(2,4,5-trichlorophenoxy) propanoic acid]	☐	☑		
71.	Trichlorofon	☐	☑		
72.	Triethanolamine	☐	☑		
73.	Triethylamine	☐	☑		
74.	Trimethylamine	☐	☑		
75.	Uranium	☐	☑		
76.	Vanadium	☐	☑		

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
77.	Vinyl acetate	☐	☑		
78.	Xylene	☐	☑		
79.	Xylenol	☐	☑		
80.	Zirconium	☐	☑		

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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TABLE E. 2,3,7,8 TETRACHLORODIBENZO P DIOXIN (2,3,7,8 TCDD) (40 CFR 122.21(g)(7)(viii))

Pollutant	TCDD Congeners Used or Manufactured	Presence or Absence (check one)		Results of Screening Procedure
		Believed Present	Believed Absent	
2,3,7,8-TCDD	☐	☐	☑	

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
WAD009069279	WA-000082-5	Inland Empire Paper Company	

Form 1 NPDES

U.S. Environmental Protection Agency
Application for NPDES Permit to Discharge Wastewater

GENERAL INFORMATION

SECTION 1. ACTIVITIES REQUIRING AN NPDES PERMIT (40 CFR 122.21(f) and (f)(1))

Activities Requiring an NPDES Permit

1.1 Applicants *Not Required* to Submit Form 1

1.1.1	Is the facility a new or existing **publicly owned treatment works**? If yes, STOP. Do NOT complete Form 1. Complete Form 2A. ☑ No	1.1.2	Is the facility a new or existing **treatment works treating domestic sewage**? If yes, STOP. Do NOT complete Form 1. Complete Form 2S. ☑ No

1.2 Applicants *Required* to Submit Form 1

1.2.1	Is the facility a **concentrated animal feeding operation** or a **concentrated aquatic animal production facility?** ☐ Yes → Complete Form 1 ***and*** Form 2B. ☑ No	1.2.2	Is the facility an **existing** manufacturing, commercial, mining, or silvicultural **facility** that **is currently discharging process wastewater?** ☑ Yes → Complete Form 1 ***and*** Form 2C. ☐ No
1.2.3	Is the facility a **new** manufacturing, commercial, mining, or silvicultural **facility** that has **not yet commenced to discharge**? ☐ Yes → Complete Form 1 ***and*** Form 2D. ☑ No	1.2.4	Is the facility a **new or existing** manufacturing, commercial, mining, or silvicultural **facility** that **discharges only nonprocess wastewater**? ☐ Yes → Complete Form 1 ***and*** Form 2E. ☑ No
1.2.5	Is the facility a **new or existing facility** whose discharge is composed entirely of **stormwater associated with industrial activity** or whose discharge is composed of **both stormwater and non-stormwater**? ☐ Yes → Complete Form 1 ***and*** Form 2F unless exempted by 40 CFR 122.26(b)(14)(x) or (b)(15). ☑ No		

SECTION 2. NAME, MAILING ADDRESS, AND LOCATION (40 CFR 122.21(f)(2))

Name, Mailing Address, and Location

2.1 Facility Name

Inland Empire Paper Company

2.2 EPA Identification Number

WAD009069279

2.3 Facility Contact

Name (first and last)	Title	Phone number
Doug Krapas	Environmental Manager	(509) 924-1911

Email address
dougkrapas@iepco.com

2.4 Facility Mailing Address

Street or P.O. box
3320 N. Argonne

City or town	State	ZIP code
Spokane	WA	99212

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
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Name, Mailing Address, and Location Continued

2.5	**Facility Location**		
	Street, route number, or other specific identifier 3320 N. Argonne		
	County name Spokane	County code (if known) 53063	
	City or town Spokane	State WA	ZIP code 99212

SECTION 3. SIC AND NAICS CODES (40 CFR 122.21(f)(3))

SIC and NAICS Codes

3.1	**SIC Code(s)**	**Description** (optional)
	2611	Paper Mill producing Newsprint
3.2	**NAICS Code(s)**	**Description** (optional)
	322122	Newsprint Mills

SECTION 4. OPERATOR INFORMATION (40 CFR 122.21(f)(4))

Operator Information

4.1	**Name of Operator** Inland Empire Paper Company
4.2	Is the name you listed in Item 4.1 also the owner? ☑ Yes ☐ No
4.3	**Operator Status** ☐ Public—federal ☐ Public—state ☐ Other public (specify)_____ ☑ Private ☐ Other (specify) _____
4.4	**Phone Number of Operator** (509) 924-1911

Operator Information Continued

4.5	**Operator Address**		
	Street or P.O. Box 3320 N. Argonne		
	City or town Spokane	State WA	ZIP code 99212
	Email address of operator dougkrapas@iepco.com		

SECTION 5. INDIAN LAND (40 CFR 122.21(f)(5))

Indian Land

5.1	Is the facility located on Indian Land? ☐ Yes ☑ No

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
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SECTION 6. EXISTING ENVIRONMENTAL PERMITS (40 CFR 122.21(f)(6))

Existing Environmental Permits

6.1 **Existing Environmental Permits** (check all that apply and print or type the corresponding permit number for each)

☑ NPDES (discharges to surface water) WA-000082-5	☐ RCRA (hazardous wastes) WAD009069279	☐ UIC (underground injection of fluids)
☐ PSD (air emissions)	☐ Nonattainment program (CAA)	☐ NESHAPs (CAA)
☐ Ocean dumping (MPRSA)	☐ Dredge or fill (CWA Section 404)	☑ Other (specify) AOP-1 {Renewal #3}, Air Opera

SECTION 7. MAP (40 CFR 122.21(f)(7))

Map

7.1 Have you attached a topographic map containing all required information to this application? (See instructions for specific requirements.)

☑ Yes ☐ No ☐ CAFO—Not Applicable (See requirements in Form 2B.)

SECTION 8. NATURE OF BUSINESS (40 CFR 122.21(f)(8))

Nature of Business

8.1 Describe the nature of your business.

Inland Empire Paper Company manufactures newsprint and specialty paper products from Groundwood-Thermo-Mechanical Pulp (TMP) and De-ink processes utilizing recycled newspapers, magazine and office paper. IEP has also maintained its groundwood Refiner Mechanical Pulp (RMP) process as a back-up and for potential expanded production. The average furnish split for the production of IEP's paper products is approximately 70% TMP and 30% De-ink pulp. The current production capacity of IEP's paper machine is approximately 525 tons per day.

SECTION 9. COOLING WATER INTAKE STRUCTURES (40 CFR 122.21(f)(9))

Cooling Water Intake Structures

9.1 Does your facility use cooling water?

☑ Yes ☐ No → SKIP to Item 10.1.

9.2 Identify the source of cooling water. (Note that facilities that use a cooling water intake structure as described at 40 CFR 125, Subparts I and J may have additional application requirements at 40 CFR 122.21(r). Consult with your NPDES permitting authority to determine what specific information needs to be submitted and when.)

Groundwater/Aquifer authorized under Groundwater Claim Number G3-06237A

SECTION 10. VARIANCE REQUESTS (40 CFR 122.21(f)(10))

Variance Requests

10.1 Do you intend to request or renew one or more of the variances authorized at 40 CFR 122.21(m)? (Check all that apply. Consult with your NPDES permitting authority to determine what information needs to be submitted and when.)

☐ Fundamentally different factors (CWA Section 301(n))

☐ Non-conventional pollutants (CWA Section 301(c) and (g))

☑ Not applicable

☐ Water quality related effluent limitations (CWA Section 302(b)(2))

☐ Thermal discharges (CWA Section 316(a))

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
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SECTION 11. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))

Checklist and Certification Statement

11.1 In Column 1 below, mark the sections of Form 1 that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to provide attachments.

Column 1	Column 2
☑ Section 1: Activities Requiring an NPDES Permit	☐ w/ attachments
☑ Section 2: Name, Mailing Address, and Location	☐ w/ attachments
☑ Section 3: SIC Codes	☐ w/ attachments
☑ Section 4: Operator Information	☐ w/ attachments
☑ Section 5: Indian Land	☐ w/ attachments
☑ Section 6: Existing Environmental Permits	☐ w/ attachments
☑ Section 7: Map	☑ w/ topographic map ☐ w/ additional attachments
☐ Section 8: Nature of Business	☐ w/ attachments
☑ Section 9: Cooling Water Intake Structures	☐ w/ attachments
☐ Section 10: Variance Requests	☐ w/ attachments
☑ Section 11: Checklist and Certification Statement	☐ w/ attachments

11.2 **Certification Statement**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (print or type first and last name)	Official title
Kevin D. Rasler	President and General Manager
Signature	**Date signed**
	03/01/2021

AQUATIC TOXICOLOGY REPORT

Project Name: INLAND EMPIRE PAPER COMPANY

Location: SPOKANE, WASHINGTON

Prepared by:

Eurofins TestAmerica - Corvallis
(aka TestAmerica – ASL)

1100 NE Circle Boulevard, Suite 310
Corvallis, Oregon 97330
541-243-6137

Accredited in accordance with NELAP

Oregon Environmental Laboratory Accreditation Program #OR100022 (NELAP)
State of Washington DOE Environmental Laboratory Accreditation Program, Lab ID C556
California State Environmental Laboratory Accreditation Program, Certificate No.: 1726

Report Date: February 21, 2021 Released by: Michelle Bennett

Lab I.D. No. B4926

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INTRODUCTION

Eurofins TestAmerica – Corvallis (ET-C) Aquatic Toxicology Laboratory conducted toxicity testing on sample(s) from Inland Empire Paper Company, Spokane, Washington.

Testing was initiated on: January 26, 2021

The test(s) were conducted using:

- the water flea (*Ceriodaphnia dubia*)
- the fathead minnow (*Pimephales promelas*)

OVERVIEW OF REGULATORY GUIDANCE

The following provides an overview and excerpts of applicable permit specifics, regulatory guidance, and other relevant information. This is intended only as a helpful guide, from a laboratory perspective, for understanding test outcomes. The final responsibility for interpretation of results remains with the client and/or regulatory agency.

The following guidance is taken from ET-C's reading of the NPDES permit for Inland Empire Paper Company in Spokane, WA (permit #WA-000082-5, effective Nov 1, 2011, expires Oct 31, 2016).

Note: No subsequent permit had been received by ET-C at the time of testing.

Acute toxicity:

- *Effluent Limit for Chronic Toxicity*:
  - "No toxicity detected in a test concentration representing the acute critical effluent concentration (ACEC)."
  - "The ACEC equals 28.3% effluent."
- *Compliance with the Effluent Limit for Chronic Toxicity*:
  - "Compliance with the effluent limit for chronic toxicity means no statistically significant difference in response between the control and the test concentration representing the ACEC."
  - "The Permittee must determine the statistical significance by conducting a hypothesis test at the 0.05 level of significance …" (i.e. alpha = 0.05)
  - "If the difference in survival between the control and the ACEC is less than 10 percent, … must conduct the hypothesis test at the 0.01 level of significance."
- *Response to Noncompliance with the Effluent Limit for Chronic Toxicity*:
  - "If a toxicity test … determines a statistically significant difference in response between the ACEC and the control … the Permittee must begin additional compliance monitoring within one week of receiving the test results".

Chronic toxicity:

- *Effluent Limit for Chronic Toxicity*:
  - "No toxicity detected in a test concentration representing the chronic critical effluent concentration (CCEC)."
  - "The CCEC equals 3.4% effluent."
- *Compliance with the Effluent Limit for Chronic Toxicity*:
  - "Compliance with the effluent limit for chronic toxicity means no statistically significant difference in response between the control and the test concentration representing the CCEC."
  - "The Permittee must determine the statistical significance by conducting a hypothesis test at the 0.05 level of significance …" (i.e. alpha = 0.05)
  - "If the difference in survival between the control and the CCEC is less than 20 percent, … must conduct the hypothesis test at the 0.01 level of significance."
- *Response to Noncompliance with the Effluent Limit for Chronic Toxicity*:
  - "If a toxicity test … determines a statistically significant difference in response between the CCEC and the control … the Permittee must begin additional compliance monitoring within one week of receiving the test results".

The following is taken from the WDOE guidance (WQ-R-95-80, June 2016 revision):

- "To reduce WET limit violations due to statistically significance that is a Type I error (false positive), we lower the alpha for hypothesis testing when differences in test organisms response are small."
- "Alpha will be lowered from 0.05 to 0.01 if a 10% difference in an acute test is significant or a 20% difference in a chronic test is significant."

SUMMARY OF TEST RESULTS

Exhibits 1 and 2 provide a summary of the final test results.

EXHIBIT 1
Summary of Acute Test Results

Species	NOEC (%)	LOEC (%)	LC_{50} (%)	Was a statistically significant difference between control and ACEC shown?
C. dubia	100	> 100	> 100	No
P. promelas	100	> 100	> 100	No

Note: acronyms are as defined below.

From the NPDES permit - *Effluent Limit for Acute Toxicity*: "No acute toxicity detected in a test concentration representing the acute critical effluent concentration [ACEC = 28.3%]."

More detailed information is provided in the Results and Discussion section.

EXHIBIT 2
Summary of Chronic Test Results

Species	NOEC (%)	LOEC (%)	IC_{25} (%)	Was a statistically significant difference between control and CCEC shown?
C. dubia	100	> 100	> 100	No
P. promelas	100	> 100	> 100	No

Note: acronyms are as defined below.

From the NPDES permit – *Compliance with the Effluent Limit for Chronic Toxicity*: "If the test results show a statistically significant difference in survival between the control and the CCEC [3.4%], the test does not comply with the effluent limit for chronic toxicity."

More detailed information is provided in the Results and Discussion section.

ACRONYM DEFINITIONS (from EPA guidance):

NOEC = No Observed Effect Concentration: The highest test concentration that causes no observable adverse effects on the test organisms (i.e. no statistically significant reduction from the control).
LOEC = Low Observed Effect Concentration: The lowest test concentration that does cause an observable adverse effect on the test organisms (i.e. is statistically significant reduction from the control).
LC_{50} = Lethal Concentration (50%): A point estimate of the test concentration that would cause death in 50 percent of the test population.
IC_{25} = Inhibition Concentration (25%): A point estimate of the test concentration that would cause a 25 percent reduction of a non-quantal biological measurement (i.e. growth, reproduction, etc.) for the test population.

SAMPLE INFORMATION

Exhibit 3 provides a summary of the sample conditions as received.

EXHIBIT 3
Sample Conditions on Receipt

Sample ID	**IEP_Comp**		
ET-C SDG + suffix	B4926 -01	-02	-03
Collection - Date and Time	01/25/2021 07:00	01/27/2021 07:00	01/29/2021 07:00
Receipt - Date and Time	01/26/2021 10:30	01/28/2021 08:41	01/30/2021 09:35
Temperature (°C)	1.1, 1.2	0.3, 0.7	0.9, 1.0
Dissolved Oxygen (mg/L)	10.3	10.1	9.7
pH	8.1	8.1	8.0
Conductivity (µS/cm)	1215	1179	997
Total Residual Chlorine (mg/L)	0.04	< 0.02	0.03
Ammonia (mg/L as NH_3-N)	< 0.10	0.23	0.20
Total Hardness (mg/L as $CaCO_3$)	181	200	194
Total Alkalinity (mg/L as $CaCO_3$)	464	464	400

METHODS AND MATERIALS

TEST METHODS

The acute test methods were performed according to: *Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms*, USEPA Office of Water (2002), EPA-821-R-02-012.

The chronic test methods were performed according to: *Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms*, Fourth Edition, (2002), EPA-821-R-02-013.

Additional guidance was provided by:

- *Whole Effluent Toxicity Testing Guidance and Test Review Criteria*, Washington State Department of Ecology (revised Jun 2016) Pub# WQ-R-95-80.

DEVIATIONS FROM PROTOCOLS

Deviations from required procedures in the test methods:

- None noted.

Deviations from recommended procedures in the test methods:

- For the *C. dubia* chronic test, some of the instantaneous temperature readings fell outside of the recommended range of 25±1°C. However, the required test condition of a temperature deviation (i.e. maximum minus minimum) of no more than 3 °C was met. This situation is detailed further in the Results and Discussion section of this report.
- All subsequent uses of a sample did not occur within the WDOE recommended maximum holding time of 72 hours past the time of sample collection.

TEST DESIGN

The following summarizes the conditions used for both overall testing and the specifics for each test (observations and notations can be found on the datasheets in Appendix A):

Overall Test Design:

- Acute tests: 3.4, 12.5, 28.3, 50, and 100 percent sample + dilution water for the control.
- Chronic tests: 3.4, 12.5, 28.3, 50, and 100 percent sample + dilution water for the control.

Test Organism Conditions:

- All organisms tested were fed and maintained during culturing, acclimation, and testing as prescribed by the EPA (2002).
- The test organisms appeared vigorous and in good condition prior to testing.

C. dubia acute test: (WDOE)

- Source: ET-C's in-house cultures
- Age: Less than 24 hours old
- Design: Four test vessels per concentration, five organisms per vessel
- Test Solution Renewal: None (i.e. static test)
- Monitoring:
    - Daily: Survival, DO, pH, and temperature; all concentrations.
    - Test Initiation and Termination: Conductivity, all concentrations
- Termination: 48 hours.
- Endpoints: Survival (at termination)

P. promelas acute test (renewal):

- Source: Aquatox Inc., Hot Springs, Arkansas
- Age: 1 to 14 days old, within a 24 hour age range
- Design: Four test vessels per concentration, Ten organisms per vessel
- Test Solution Renewal: Once @ 48 hours (i.e. static-renewal test)
- Monitoring:
    - Daily: Survival, DO, pH, and temperature; all concentrations.
    - Pre and Post Renewal solutions: DO and pH, all concentrations.
    - Test Initiation, with each new sample use, and Termination:

        - Conductivity, all concentrations (WDOE)
- Termination: 96 hours.
- Endpoints: Survival (at termination)

C. dubia chronic test:

- Source: ET-C's in-house cultures
- Age: Less than 24 hours old and within an 8-hour age range, with blocking by known parentage
- Design: Ten test vessels per concentration, one organism per vessel
- Test Solution Renewal: Daily
- Monitoring:
    - Daily: Survival and neonate production (with brood determination)
    - Daily: DO and pH in pre and post-renewal solutions, all concentrations
    - Daily: Temperature in pre-renewal solutions, all concentrations
    - With each new sample: Conductivity in post-renewal solutions, control and highest sample concentration
- Termination: When 60%+ of surviving control organisms produce a 3rd brood.
    - Survival: @ after 7 days.
    - Reproduction: When 60%+ of surviving control organisms produce a 3rd brood.
- Endpoints: Survival (at termination) and Reproduction (through first 3 broods)

P. promelas chronic test:

- Source: Aquatox Inc., Hot Springs, Arkansas
- Age: Less than 48 hours old and within an 24 hour age range
- Design: Four test vessels per concentration, ten organisms per vessel
- Test Solution Renewal: Daily
- Monitoring:
    - Daily: Survival
    - Daily: DO and pH in pre and post-renewal solutions, all concentrations
    - Daily: Temperature in pre-renewal solutions, all concentrations
    - With each new sample: Conductivity in post-renewal solutions, control and highest sample concentration
- Termination: 7 days after test initiation.
- Endpoints: Survival and Growth (average dry weight per organism added @ initiation)

DILUTION WATER

The dilution water used was the standard culture water used by ET-C:

- Reconstituted, moderately hard water (as per EPA protocol) with a total hardness of 75 to 105 mg/L as $CaCO_3$ and an alkalinity of 50 to 75 mg/L as $CaCO_3$.

SAMPLE COLLECTION AND STORAGE

Samples were collected by Inland Empire Paper personnel. The samples were accepted as scheduled by ET-C. Chain of Custody and Sample Receipt Records are provided in Appendix C.

- All samples were received within the EPA recommended 0 to 6 °C range.
- All samples were received within the WDOE required 0 to 6 °C range.

- All samples were initially used for test initiation or test solution renewal within the EPA recommended maximum holding time of 36 hours of sample collection.
- All subsequent uses of a sample occurred within the EPA recommended maximum holding time of 72 hours past the time of initial use of that sample.
- Not all subsequent uses of a sample occurred within the WDOE recommended maximum holding time of 72 hours past the time of sample collection.
    - The sample was collected on January 29, 2021 at 07:00. The subsequent use of the sample took place on Day 6 of the *C. dubia* chronic test at 16:20 (81 hours and 20 minutes past collection of the sample).
    - The sample was collected on January 29, 2021 at 07:00. The subsequent use of the sample took place on Day 6 of the *P. promelas* chronic test at 11:13 (76 hours and 13 minutes past collection of the sample).
- All subsequent uses of a sample occurred within the WDOE recommended maximum holding time of 84 hours past the time of sample collection. (Extended for renewals of a 96 hour duration acute test).
- Following receipt, the samples were stored in the dark at 0 to 6 °C until test solutions were prepared and tested.

SAMPLE PREPARATION

Samples used during these tests were:

- Temperature adjusted prior to test initiation and each daily renewal.

DATA ANALYSIS

The statistical analyses performed for the acute tests were those outlined in *Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms*, USEPA Office of Water, Fifth Edition (2002), EPA-821-R-02-012, using CETIS.

The statistical analyses performed for the chronic tests were those outlined in *Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms*, USEPA Office of Water, Fourth Edition (EPA 2002), EPA-821-R-02-013, using CETIS.

- The specific statistical analysis and CETIS version used for each endpoint evaluation is listed with the statistical outputs included with each test in Appendix A.
- If any additional analysis methods were also used, an explanation of the rationale and reference to the source method is included with the presentation of those results below.

Additional guidance was provided by:

- *Whole Effluent Toxicity Testing Guidance and Test Review Criteria*, Washington State Department of Ecology (revised Jun 2016) Pub# WQ-R-95-80.

RESULTS AND DISCUSSION

The raw data sheets for all tests are presented in Appendix A.

ACUTE BIOASSAYS

Table 1 summarizes the survival data for the *C. dubia* acute test.

Table 1
Summary of Acute Results
C. dubia

Sample Concentration (%)	Percent Survival (at Test Termination)
Control	95
3.4	100
12.5	100
28.3	95
50.0	90
100	100

Statistical analysis in accordance with the EPA protocol and WDOE guidance results in:

- NOEC = 100 %
- LOEC > 100 %
- LC_{50} > 100 %

From the NPDES permit - *Effluent Limit for Acute Toxicity*: "No acute toxicity detected in a test concentration representing the acute critical effluent concentration [ACEC = 28.3%]."

- No statistically significant difference between control and ACEC was shown.

Dissolved oxygen concentrations remained at 4.0 mg/L or greater throughout the test period. Test temperatures remained in the range of 20±1 °C.

The *C. dubia* acute test meets Test Acceptability Criteria (TAC) of a minimum 90 percent control survival. Unless referenced above, the tests proceeded without any noted deviations or interruptions that could have affected test results. The testing should be considered "valid".

Table 2 summarizes the survival data for the *P. promelas* acute test.

Table 2 **Summary of Acute Results** ***P. promelas***	
Sample Concentration (%)	**Percent Survival (at Test Termination)**
Control	100
3.4	100
12.5	100
28.3	100
50.0	100
100	100

Statistical analysis in accordance with the EPA protocol and WDOE guidance results in:

- NOEC = 100 %
- LOEC > 100 %
- LC_{50} > 100 %
-

From the NPDES permit - *Effluent Limit for Acute Toxicity*: "No acute toxicity detected in a test concentration representing the acute critical effluent concentration [ACEC = 28.3%]."

- No statistically significant difference between control and ACEC was shown.

Dissolved oxygen concentrations remained at 4.0 mg/L or greater throughout the test period. Test temperatures remained in the range of 20±1 °C.

The *P. promelas* acute test meets Test Acceptability Criteria (TAC) of a minimum 90 percent control survival. Unless referenced above, the tests proceeded without any noted deviations or interruptions that could have affected test results. The testing should be considered "valid".

CHRONIC BIOASSAYS

Table 3 summarizes the survival and reproduction data for the *C. dubia* chronic test.

Table 3
Summary of Chronic Results
C. dubia

Sample Concentration (%)	Percent Survival	Mean Number of Young Per Adult
Control	100	15.8
3.4	100	17.2
12.5	100	20.2
28.3	90	21.0
50.0	100	22.8
100	100	20.0

Statistical analysis in accordance with the EPA protocol and WDOE guidance results in:

- NOEC = 100 %
- LOEC > 100 %
- IC_{25} > 100 %

From the NPDES permit – *Compliance with the Effluent Limit for Chronic Toxicity*: "If the test results show a statistically significant difference in survival between the control and the CCEC [3.4%], the test does not comply with the effluent limit for chronic toxicity."

- No statistically significant difference between control and CCEC was shown.

EPA guidance recommends test temperature to remain at 25±1°C for the chronic tests. On days 1, 2, 5, 7 of the *C. dubia* test, the instantaneous temperatures in the test concentrations were slightly outside of this range at 23.2 to 25.1 °C. However, the required test condition of a temperature deviation (i.e. maximum minus minimum) over the entire test period of no more than 3 °C was met (25.9 – 23.2 = 2.7°C). The EPA chronic manual Section 4.9.2 states: "An individual test may be conditionally acceptable if the temperature, DO, and other specified conditions fall outside specifications, depending on the degree of departure and the objectives of the tests. The acceptability of the test would depend on the experience and professional judgment of the laboratory investigator and the reviewing staff of the regulatory authority". It is the laboratory's professional judgment that the minor deviation in the test temperature did not appear to affect the test results and the test should be accepted.

Dissolved oxygen concentrations remained at 4.0 mg/L or greater throughout the test period. Other than noted, test temperatures remained at 25±1 °C.

The *C. dubia* test meets Test Acceptability Criteria (TAC) for a minimum 80 percent control survival and a minimum 15 young produced per surviving control adult. Unless referenced above, the tests proceeded without any noted deviations or interruptions that could have affected test results. The testing should be considered "valid".

Table 4 summarizes the survival and growth data for the *P. promelas* chronic test.

Table 4
Summary of Chronic Results
P. promelas

Sample Concentration (%)	Percent Survival	Mean Dry Weight Per Organism Added (mg)
Control	100	0.905
3.4	97.5	0.920
12.5	100	1.054
28.3	100	1.026
50.0	100	1.070
100	97.5	1.043

Statistical analysis in accordance with the EPA protocol and WDOE guidance results in:

- NOEC = 100 %
- LOEC > 100 %
- IC_{25} > 100 %
-

From the NPDES permit – *Compliance with the Effluent Limit for Chronic Toxicity*: "If the test results show a statistically significant difference in survival between the control and the CCEC [3.4%], the test does not comply with the effluent limit for chronic toxicity."

- No statistically significant difference between control and CCEC was shown.

Dissolved oxygen concentrations remained at 4.0 mg/L or greater throughout the test period. Test temperatures remained at 25±1°C.

The *P. promelas* test meets Test Acceptability Criteria (TAC) for a minimum 80 percent control survival and a minimum weight of 0.250 mg per surviving control organism. Unless referenced above, the tests proceeded without any noted deviations or interruptions that could have affected test results. The testing should be considered "valid".

REFERENCE TOXICANT TESTS

Reference toxicant (reftox) testing is performed to document both initial and ongoing laboratory performance of the test method(s). While the health of the test organisms is primarily evaluated by the performance of the laboratory control, reftox test results also may be used to assess the health and sensitivity of the test organisms. Reftox test results within their respective cumulative summary (Cusum) chart limits are indicative of consistent laboratory performance and normal test organism sensitivity.

The results of the reftox tests indicate that the test organisms were within their respective cusum chart limits based on EPA guidelines. This demonstrates ongoing laboratory proficiency of the test methods and suggests normal test organism sensitivity in the associated client testing.

The *P. promelas* acute reftox test was conducted using sodium chloride. The *P. promelas* chronic reftox test was conducted using potassium chloride. The *C. dubia* reftox tests were conducted using sodium chloride.

The data sheets for the reference toxicant tests are provided in Appendix B.

Tables 6 and 7 summarize the reference toxicant test results and Cusum chart limits.

Table 6
Acute Reference Toxicant Tests (g/L)

Species	LC_{50}	Cusum Chart Limits
C. dubia	1.97	1.81 to 3.24
P. promelas	6.9	5.7 to 8.7

Table 7
Chronic Reference Toxicant Tests (g/L)

Species	IC_{25}	Cusum Chart Limits
C. dubia (survival)	2.38	0.44 to 2.48
C. dubia (reproduction)	0.86	0.05 to 1.38
P. promelas (survival)	0.64	0.51 to 0.68
P. promelas (growth)	0.62	0.44 to 0.72

APPENDIX A

RAW DATA SHEETS

TestAmerica

FRESHWATER TOXICITY TEST: SAMPLE AND DILUTION WATER DATA

Client: Inland Empire Paper Co. SDG # B4926

Contact: Ben Carleton 509-720-5827

Test Initiation: Date 1/26/21

Test Termination: Date 2/2/21

Sample ID Number	Field ID	Collected Date (mm/dd/yy)	Collected Time (Pacific Zone)	Received Date (mm/dd/yy)	Received Time (Pacific Zone)	Temp (°C) as Rc'vd	Total Residual Chlorine (mg/l) ☐ Dechlorination allowed: as Rc'vd / after Dechlor.	Ammonia NH_3-N mg/l as Rc'vd	Hardness mg/l as $CaCO_3$ as Rc'vd	Alkalinity mg/l as $CaCO_3$ as Rc'vd	DO (mg/L) as Rc'vd	pH as Rc'vd	Cond. (uS) as Rc'vd	60 um filtered? (organisms noted)
B4926-01	IEP_Comp	1/25/21	07:40	1/26/21	10:30	1.1 / 1.2	0.04 / -	<0.10	181	464	10.3	8.1	1215	☒ TC
B4926-02	IEP_Comp2	1/27/21	7:00	1/28/21	08:41	1.3 / 1.3	<0.02 / -	0.23	200	464	10.1	8.1	1179	☒ BC
B4926-03	IEP_Comp	1/29/21	7:00	1/30/21	09:35	1.0 / 0.9	0.03 / -	0.20	194	400	9.7	8.0	997	☒ BC
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	Reporting Limits:					na	0.02 mg/L	0.10 mg/L	5 mg/L	5 mg/L	na	na	na	na

Note: "-" Indicates data collection or dechlorination not needed. Any other adjustments to samples prior to use are documented in Comments below or on Dilutions page.

Dilution Water	ID#	Hardness mg/l as $CaCO_3$	Alkalinity mg/l as $CaCO_3$
Recon MH (FHM)	5260	84	56
	5261	89	64
	5263	84	60

Comments: ☑ Indicates the action was taken, (☐= action not taken): " - " = sample not dechlorinated, or analyte not collected/needed.

Water Quality Meters Used/ID#: Dissolved Oxygen # 4 pH # 11 Conductivity # 2

TestAmerica

FRESHWATER TOXICITY TEST: TEST ORGANISM INFORMATION

Client: Inland Empire Paper Co. Sample Designation (SDG): B 49216

Test Species Information	Cd # 3782 *Ceriodaphnia dubia* Chronic	FHM # 2146 *Pimephales promelas* Chronic	Cd # 3783 *Ceriodaphnia dubia* Acute	FHM # 2144 *Pimephales promelas* Acute	
Organism Age at Initiation	<24 hrs, all within an 8 hr window	<48 hrs, all within a 24 hour window	< 24 hrs	3 Days, within a 24 hour window	
Test Container Size	30 ml	800 ml	30 ml	400 ml	
Test Volume	15 ml	500 ml	25 ml	250 ml	
Feeding: Type and Amount	0.10 ml Algae and 0.10 ml YCT daily	0.15 ml *Artemia*, 2 x Daily	Algae and YCT during acclimation	0.15 ml *Artemia*, @ 48 hrs	
Aeration: In Test Chambers via Slow Bubble :	☒ None ☐ Prior to use	☒ None ☐ Prior to use ☐ @ _____ hrs	☒ None ☐ Prior to use	☒ None ☐ Prior to use ☐ @ _____ hrs	
Acclimation Period	<24 hrs	<24 hrs	<24 hrs	<24 hrs	
Organism Source	In-House	Aquatox	In-House	Aquatox	
Size	-	-	-	-	
Loading Rate	-	-	-	-	

Dissolved Oxygen aeration justifications (in test chambers):

Test(s): ☐ All ☐ _____

Date:

Comments:

Test Solution Preparation and Dilution Record

Note: ☐ Indicates task not done, ☑ Indicates task was done. Temp adj. = Temperature adjusted to ambient or test temp

Ditto marks ('') indicate that the same SDG, batch of dilution water, or food as the previous day's entry was used.

Client: Inland Empire Paper Co.

Ceriodaphnia dubia - Chronic

Test Concentration (%)	Sample Volume (mls)		Final Volume (mls)
Control	0.00	→	200
3.4	6.80	→	200
12.5	25.0	→	200
28.3	56.6	→	200
50.0	100	→	200
100	200	→	200

Total Sample volume needed per day = 389 mls

Test Day	Sample ID Used	Daily Sample Preparation (prior to dilution)	Dilution Water Used	YCT ID Used	Algae ID Used	Date	Time	Initials
0 (Initiation)	B 49926 01	☐ Temp adj, ☐ Aerated	ID # 5260	# 1277	# 1281B	1/26/2021	12:05	ABL
1	B 49926-01	☐ Temp adj, ☐ Aerated	ID # 5260	# 1256	# 1281	1/27/21	08:52	TC
2	B 4926 - 02	☐ Temp adj, ☐ Aerated	ID # 5260	# 1256	# 1281	1/28/21	09:20	BC
3	B 4926 - 02	☐ Temp adj, ☐ Aerated	ID # 5261	# 1277	# 1282	1/29/21	10:30	BC
4	B 4926 - 03	☐ Temp adj, ☐ Aerated	ID # 5261	# 1277	# 1281	1/30/21	10:30	BC
5	B 49926-03	☐ Temp adj, ☐ Aerated	ID # 52601	# 1256	# 1281	1/31/21	09:36	ABL
6	B 49926-03	☐ Temp adj, ☐ Aerated	ID # 5263	# 1256	# 1251	2/1/21	09:52	TC
7	B -	☐ Temp adj, ☐ Aerated	ID #	#	#	/ /	:	

Fathead minnow - Chronic

Test Concentration (%)	Sample Volume (mls)		Final Volume (mls)
Control	0.00	→	2000
3.4	68.0	→	2000
12.5	250	→	2000
28.3	566	→	2000
50.0	1,000	→	2000
100	2,000	→	2000

Total Sample volume needed per day = 3884 mls

Test Day	Sample ID Used	Daily Sample Preparation (prior to dilution)	Dilution Water Used	Date	Time	Initials
0 (Initiation)	B 49926 01	☐ Temp adj, ☐ Aerated	ID # 5260	1/26/2021	11:45	ABL
1	B 49926 01	☐ Temp adj, ☐ Aerated	ID # 5260	1/27/21	09:00	TC
2	B 4926 - 02	☐ Temp adj, ☐ Aerated	ID # 5260	1/28/21	09:10	BC
3	B 4926 - 02	☐ Temp adj, ☐ Aerated	ID # 5261	1/29/21	10:25	BC
4	B 4926 - 03	☐ Temp adj, ☐ Aerated	ID # 5261	1/30/21	10:20	BC
5	B 49926-03	☐ Temp adj, ☐ Aerated	ID # 52601	1/31/21	09:30	ABL
6	B 49926-03	☐ Temp adj, ☐ Aerated	ID # 5263	2/1/21	09:57	TC

Ceriodaphnia dubia - Acute

Test Concentration (%)	Sample Volume (mls)		Final Volume (mls)
Control	0.00	→	200
3.4	6.80	→	200
12.5	25.0	→	200
28.3	56.6	→	200
50.0	100	→	200
100	200	→	200

Test Day	Sample ID Used	Daily Sample Preparation (prior to dilution)	Dilution Water Used	Date	Time	Initials
0 (Initiation)	B 49926 01	☐ Temp adj, ☐ Aerated	ID # 5260	1/26/2021	12:14	ABL

Total Sample volume needed per day = 389 mls

Fathead minnow - Acute

Test Concentration (%)	Sample Volume (mls)		Final Volume (mls)
Control	0.00	→	1000
3.4	34.0	→	1000
12.5	125	→	1000
28.3	283	→	1000
50.0	500	→	1000
100	1,000	→	1000

Test Day	Sample ID Used	Daily Sample Preparation (prior to dilution)	Dilution Water Used	Date	Time	Initials
0 (Initiation)	B 49926 01	☐ Temp adj, ☐ Aerated	ID # 5260	1/26/2021	11:58	ABL
2	B 4926 -02	☐ Temp adj, ☐ Aerated	ID # 5260	1/28/2021	09:20	BC

Total Sample volume needed per day = 1942 mls

TestAmerica

48 HOUR FRESHWATER TOXICITY TEST SURVIVAL AND WATER QUALITY DATA

Client: Inland Empire Paper Co. | Sample ID # B 49216-01 | Beginning, Date 1-26-21 Time 1605

Sample Description: _____ | Ending, Date 1-29-21 Time 1515

Random Template Used: Whiskey Cup random # 61 | Waterbath/Incubator Used: # 7

Test Species: *Ceriodaphnia dubia* | ID# Cd 3783

		0 hr	24 hr	48 hr
Technician		~~ABL~~ / BM	BC	
Time		1605	1630	1515
Therm. ID#		# 252	# 251	# 251

Percent	Test Container Number	Number of Live Organisms 0	24	48	Dissolved Oxygen (mg/l) 0	24	48	pH 0	24	48	Temperature (°C) 0	24	48	Conductivity (µmohs/cm) 0	24	48
Control	Surrogate					7.7			7.0			20.6				
	A	5	5	5	8.5		8.0	8.1		7.9	20.7		20.6	314		314 *
	B	5	5	5												315
	C	5	5	4												
	D	5	5	5												
3.4	Surrogate					7.9			7.0			20.4				
	A	5	5	5	8.7		8.0	8.1		7.8	20.5		20.4	347		~~347~~ *
	B	5	5	5												343
	C	5	5	5												
	D	5	5	5												
12.5	Surrogate					8.1			7.7			20.4				
	A	5	5	5	8.7		8.1	8.1		7.9	20.6		20.3	430		430 *
	B	5	5	5												423
	C	5	BC 20.4 5	5												
	D	5	5	5												
28.3	Surrogate					8.2			7.9			20.4				
	A	5	5	5	8.8		8.1	8.1		8.2	20.5		20.4	553		~~553~~ *
	B	5	5	5												557
	C	5	4	4												
	D	5	5	5												
50.0	Surrogate					8.3			8.0			20.4				
	A	5	5	5	8.9		8.1	8.1		8.4	20.5		20.5	730		730 *
	B	5	5	5												728
	C	5	3	3												
	D	5	5	5												
100	Surrogate					8.3			8.2			20.4				
	A	5	—	5	9.1		8.2	8.1		8.6	20.5		20.4	1133		~~1133~~ *
	B	5	5	5												1109
	C	5	—	5												
	D	5	—	5												

Note: Use surrogate test chamber to determine temperature, DO, pH, and Conductivity measurements @ 24 hrs (to avoid injuring the organisms).

*RO6 ABL 1-26-21

Ceriodaphnia 48-h Acute Survival Test — **Eurofins TestAmerica - Corvallis**

Batch ID:	18-0972-4675	**Test Type:**	Survival (48h)	**Analyst:**	Michelle Bennett		
Start Date:	26 Jan-21 16:05	**Protocol:**	EPA/821/R-02-012 (2002)	**Diluent:**	Mod-Hard Synthetic Water		
Ending Date:	28 Jan-21 15:15	**Species:**	Ceriodaphnia dubia	**Brine:**			
Test Length:	47h	**Taxon:**		**Source:**	In-House Culture	**Age:**	<24

Sample ID:	06-5598-2434	**Code:**	B4926-01	**Project:**			
Sample Date:	25 Jan-21 07:00	**Material:**	Industrial Effluent	**Source:**	Inland Empire Paper (WA0000825)		
Receipt Date:	26 Jan-21 10:30	**CAS (PC):**		**Station:**			
Sample Age:	33h (1.1 °C)	**Client:**					

Multiple Comparison Summary

Analysis ID	Endpoint	Comparison Method	✓	NOEL	LOEL	TOEL	PMSD	TU	S
00-7694-2479	48h Survival Rate	Steel Many-One Rank Sum Test		100	>100	---	17.4%	1	1

Point Estimate Summary

Analysis ID	Endpoint	Point Estimate Method	✓	Level	%	95% LCL	95% UCL	TU	S
05-2151-3143	48h Survival Rate	Linear Interpolation (ICPIN)		EC50	>100	---	---	<1	1

Test Acceptability

				TAC Limits			
Analysis ID	Endpoint	Attribute	Test Stat	Lower	Upper	Overlap	Decision
00-7694-2479	48h Survival Rate	Control Resp	0.95	0.9	>>	Yes	Passes Criteria
05-2151-3143	48h Survival Rate	Control Resp	0.95	0.9	>>	Yes	Passes Criteria

48h Survival Rate Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Min	Max	Std Err	Std Dev	CV%	%Effect
0	D	4	0.9500	0.7909	1.1090	0.8000	1.0000	0.0500	0.1000	10.53%	0.00%
3.4		4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	-5.26%
12.5		4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	-5.26%
28.3		4	0.9500	0.7909	1.1090	0.8000	1.0000	0.0500	0.1000	10.53%	0.00%
50		4	0.9000	0.5818	1.2180	0.6000	1.0000	0.1000	0.2000	22.22%	5.26%
100		4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	-5.26%

48h Survival Rate Detail MD5: 12A8DA280291B2C92E2A6CF965778893

Conc-%	Code	Rep 1	Rep 2	Rep 3	Rep 4
0	D	1.0000	1.0000	0.8000	1.0000
3.4		1.0000	1.0000	1.0000	1.0000
12.5		1.0000	1.0000	1.0000	1.0000
28.3		1.0000	1.0000	0.8000	1.0000
50		1.0000	1.0000	0.6000	1.0000
100		1.0000	1.0000	1.0000	1.0000

48h Survival Rate Binomials

Conc-%	Code	Rep 1	Rep 2	Rep 3	Rep 4
0	D	5/5	5/5	4/5	5/5
3.4		5/5	5/5	5/5	5/5
12.5		5/5	5/5	5/5	5/5
28.3		5/5	5/5	4/5	5/5
50		5/5	5/5	3/5	5/5
100		5/5	5/5	5/5	5/5

Ceriodaphnia 48-h Acute Survival Test — **Eurofins TestAmerica - Corvallis**

Analysis ID:	00-7694-2479	**Endpoint:**	48h Survival Rate	**CETIS Version:**	CETISv1.9.7
Analyzed:	12 Feb-21 15:00	**Analysis:**	Nonparametric-Control vs Treatments	**Status Level:**	1
Edit Date:	12 Feb-21 14:59	**MD5 Hash:**	12A8DA280291B2C92E2A6CF965778893	**Editor ID:**	006-834-630-9

Data Transform	Alt Hyp	NOEL	LOEL	TOEL	TU	MSDu	PMSD
Angular (Corrected)	C > T	100	>100	---	1	0.1656	17.43%

Steel Many-One Rank Sum Test

Control	vs	Conc-%	Test Stat	Critical	Ties	DF	P-Type	P-Value	Decision(α:5%)
Dilution Water		3.4	20	10	1	6	CDF	0.9516	Non-Significant Effect
		12.5	20	10	1	6	CDF	0.9516	Non-Significant Effect
		28.3	18	10	2	6	CDF	0.8333	Non-Significant Effect
		50	17.5	10	1	6	CDF	0.7867	Non-Significant Effect
		100	20	10	1	6	CDF	0.9516	Non-Significant Effect

ANOVA Table

Source	Sum Squares	Mean Square	DF	F Stat	P-Value	Decision(α:5%)
Between	0.0446084	0.0089217	5	0.6603	0.6580	Non-Significant Effect
Error	0.243214	0.0135119	18			
Total	0.287823		23			

ANOVA Assumptions Tests

Attribute	Test	Test Stat	Critical	P-Value	Decision(α:1%)
Variance	Bartlett Equality of Variance Test				Indeterminate
Distribution	Shapiro-Wilk W Normality Test	0.7342	0.884	3.0E-05	Non-Normal Distribution

48h Survival Rate Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Median	Min	Max	Std Err	CV%	%Effect
0	D	4	0.9500	0.7909	1.0000	1.0000	0.8000	1.0000	0.0500	10.53%	0.00%
3.4		4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	-5.26%
12.5		4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	-5.26%
28.3		4	0.9500	0.7909	1.0000	1.0000	0.8000	1.0000	0.0500	10.53%	0.00%
50		4	0.9000	0.5818	1.0000	1.0000	0.6000	1.0000	0.1000	22.22%	5.26%
100		4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	-5.26%

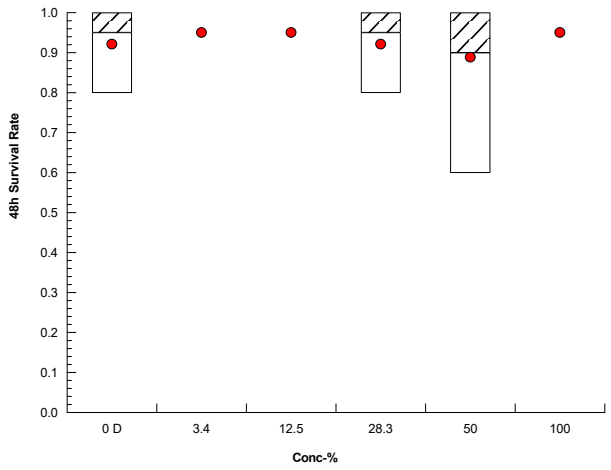
Angular (Corrected) Transformed Summary

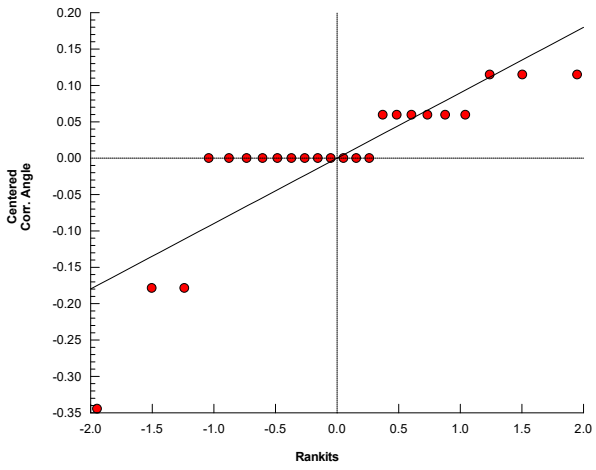
Conc-%	Code	Count	Mean	95% LCL	95% UCL	Median	Min	Max	Std Err	CV%	%Effect
0	D	4	1.2860	1.0960	1.4750	1.3450	1.1070	1.3450	0.0595	9.26%	0.00%
3.4		4	1.3450	1.3450	1.3460	1.3450	1.3450	1.3450	0.0000	0.00%	-4.63%
12.5		4	1.3450	1.3450	1.3460	1.3450	1.3450	1.3450	0.0000	0.00%	-4.63%
28.3		4	1.2860	1.0960	1.4750	1.3450	1.1070	1.3450	0.0595	9.26%	0.00%
50		4	1.2300	0.8651	1.5960	1.3450	0.8861	1.3450	0.1148	18.66%	4.30%
100		4	1.3450	1.3450	1.3460	1.3450	1.3450	1.3450	0.0000	0.00%	-4.63%

Ceriodaphnia 48-h Acute Survival Test **Eurofins TestAmerica - Corvallis**

Analysis ID:	00-7694-2479	**Endpoint:**	48h Survival Rate	**CETIS Version:**	CETISv1.9.7
Analyzed:	12 Feb-21 15:00	**Analysis:**	Nonparametric-Control vs Treatments	**Status Level:**	1
Edit Date:	12 Feb-21 14:59	**MD5 Hash:**	12A8DA280291B2C92E2A6CF965778893	**Editor ID:**	006-834-630-9

Graphics





CETIS Analytical Report

Test Code/ID: B492601cda / 06-5194-3188

Ceriodaphnia 48-h Acute Survival Test — **Eurofins TestAmerica - Corvallis**

Analysis ID:	05-2151-3143	**Endpoint:**	48h Survival Rate	**CETIS Version:**	CETISv1.9.7
Analyzed:	12 Feb-21 15:00	**Analysis:**	Linear Interpolation (ICPIN)	**Status Level:**	1
Edit Date:	12 Feb-21 14:59	**MD5 Hash:**	12A8DA280291B2C92E2A6CF965778893	**Editor ID:**	006-834-630-9

Linear Interpolation Options

X Transform	Y Transform	Seed	Resamples	Exp 95% CL	Method
Log(X+1)	Linear	280466	200	Yes	Two-Point Interpolation

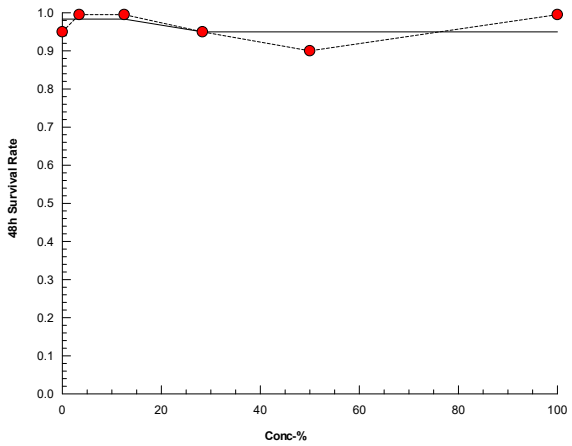
Point Estimates

Level	%	95% LCL	95% UCL	TU	95% LCL	95% UCL
EC50	>100	---	---	<1	---	---

48h Survival Rate Summary

			Calculated Variate(A/B)							Isotonic Variate	
Conc-%	**Code**	**Count**	**Mean**	**Median**	**Min**	**Max**	**CV%**	**%Effect**	**A/B**	**Mean**	**%Effect**
0	D	4	0.9500	1.0000	0.8000	1.0000	10.53%	0.00%	19/20	0.9833	0.00%
3.4		4	1.0000	1.0000	1.0000	1.0000	0.00%	-5.26%	20/20	0.9833	0.00%
12.5		4	1.0000	1.0000	1.0000	1.0000	0.00%	-5.26%	20/20	0.9833	0.00%
28.3		4	0.9500	1.0000	0.8000	1.0000	10.53%	0.00%	19/20	0.9500	3.39%
50		4	0.9000	1.0000	0.6000	1.0000	22.22%	5.26%	18/20	0.9500	3.39%
100		4	1.0000	1.0000	1.0000	1.0000	0.00%	-5.26%	20/20	0.9500	3.39%

Graphics



TestAmerica

96 HOUR FRESHWATER TOXICITY TEST SURVIVAL AND WATER QUALITY DATA

Random Template Used: 6 conc. x 4 reps. # 1

Sample Description

Waterbath/Incubator Used: # 7

Initial Sample ID # B 4926-01

Test Initiation Date: 1/26/2021 Time: 13:51

Termination Date: 1/30/2021 Time: 13:50

Client: Inland Empire Paper Co.

Test Species: *Pimephales promelas* ID# FHM 2144

		24 hr	48 hr	72 hr	96 hr
Technician	0 hr TC	TC	BC	BC	ABL
Time	0 hr 13:51	10:37	15:45	11:15	13:50
Therm. ID#	0 hr # 255	# 255 357 TC 1129	# 255	# 255	# 251

Percent	Test Container Number	Number of Live Organisms 0	24	48	72	96	Dissolved Oxygen (mg/l) 0	24	48	72	96	pH 0	24	48	72	96	Temperature (°C) 0	24	48	72	96	Conductivity (µmohs/cm) 0	24	48	72	96
Control	A	10	10	10	10	10	8.5	8.1	7.0/8.3	7.5	7.6	8.0	7.4	7.6/8.4	7.0	7.3	19.3	20.5	20.6	20.0	20.0	271		327/313		332
	B	10	10	10	10	10																				
	C	10	10	10	10	10																				
	D	10	10	10	10	10																				
3.4	A	10	10	10	10	10	8.7	8.2	7.1/8.4	7.7	7.8	8.2	7.5	7.6/8.0	7.2	7.4	19.9	20.4	19.8	19.8	19.9	340		369/340		363
	B	10	10	10	10	10																				
	C	10	10	10	10	10																				
	D	10	10	10	10	10																				
12.5	A	10	10	10	10	10	8.7	8.2	7.2/8.6	7.8	8.1	8.1	7.7	7.7/8.0	7.4	7.7	19.8	20.4	19.9	19.9	19.9	345		450/415		443
	B	10	10	10	10	10																				
	C	10	10	10	10	10																				
	D	10	10	10	10	10																				

TestAmerica

96 HOUR FRESHWATER TOXICITY TEST SURVIVAL AND WATER QUALITY DATA

Random Template Used: 6 conc. x 4 reps. # 1

Sample Description

Waterbath/Incubator Used: # 7

Initial Sample ID # B 4926-01

Client: Inland Empire Paper Co.

Test Species: *Pimephales promelas* ID# FHM 2144

		0 hr	24 hr	48 hr	72 hr	96 hr
Technician		TC	TC	BC	BC	
Time		13:51	10:37	15:45	11:15	13:50
Therm. ID#		# 255	# 255 251 TC 1127	# 255	# 255	# 251

Test Initiation Date: 1/26/20 21 Time: 13:51

Termination Date: 1/30/20 21 Time: 13:50

Percent	Test Container Number	Number of Live Organisms 0	24	48	72	96	Dissolved Oxygen (mg/l) 0	24	48	72	96	pH 0	24	48	72	96	Temperature (°C) 0	24	48	72	96	Conductivity (µmohs/cm) 0	24	48	72	96
28.3	A	10	10	10	10	10	8.9	8.2	7.3/8.7	7.9	8.4	8.1	7.9	8.0/8.0	8.2	8.0	19.4	20.5	19.8	19.9	19.9	551		576/537		576
	B	10	10	10	10	10																				
	C	10	10	10	10	10																				
	D	10	10	10	10	10																				
50.0	A	10	10	10	10	10	9.1	8.3	7.3/8.9	7.9	8.4	8.1	8.1	8.2/8.1	8.3	8.1	19.5	20.4	19.9	20.0	19.9	728		757/712		754
	B	10	10	10	10	10																				
	C	10	10	10	10	10																				
	D	10	10	10	10	10																				
100	A	10	10	10	10	10	9.0	8.2	7.1/9.0	7.7	8.5	8.1	8.2	8.4/8.1	8.4	8.3	19.5	20.3	20.0	20.0	20.0	1097		1127/1092		1144
	B	10	10	10	10	10																				
	C	10	10	10	10	10																				
	D	10	10	10	10	10																				

Fathead Minnow 96-h Acute Survival Test — **Eurofins TestAmerica - Corvallis**

Batch ID:	06-5390-6948	**Test Type:**	Survival (96h)	**Analyst:**	Michelle Bennett		
Start Date:	26 Jan-21 13:51	**Protocol:**	EPA/821/R-02-012 (2002)	**Diluent:**	Mod-Hard Synthetic Water		
Ending Date:	30 Jan-21 13:50	**Species:**	Pimephales promelas	**Brine:**			
Test Length:	96h	**Taxon:**	Actinopterygii	**Source:**	Aquatox, AR	**Age:**	3 D

Sample ID:	06-5598-2434	**Code:**	B4926-01	**Project:**			
Sample Date:	25 Jan-21 07:00	**Material:**	Industrial Effluent	**Source:**	Inland Empire Paper (WA0000825)		
Receipt Date:	26 Jan-21 10:30	**CAS (PC):**		**Station:**			
Sample Age:	31h (1.1 °C)	**Client:**					

Multiple Comparison Summary

Analysis ID	Endpoint	Comparison Method	✓	NOEL	LOEL	TOEL	PMSD	TU	S
04-4598-0896	96h Survival Rate	Steel Many-One Rank Sum Test		100	>100	---	---	1	1

Point Estimate Summary

Analysis ID	Endpoint	Point Estimate Method	✓	Level	%	95% LCL	95% UCL	TU	S
01-6011-0195	96h Survival Rate	Linear Interpolation (ICPIN)		EC50	>100	---	---	<1	1

Test Acceptability

				TAC Limits			
Analysis ID	Endpoint	Attribute	Test Stat	Lower	Upper	Overlap	Decision
01-6011-0195	96h Survival Rate	Control Resp	1	0.9	>>	Yes	Passes Criteria
04-4598-0896	96h Survival Rate	Control Resp	1	0.9	>>	Yes	Passes Criteria

96h Survival Rate Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Min	Max	Std Err	Std Dev	CV%	%Effect
0	D	4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
3.4		4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
12.5		4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
28.3		4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
50		4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
100		4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%

96h Survival Rate Detail MD5: F8C44704EB3AE9A3236D954420B5BFF7

Conc-%	Code	Rep 1	Rep 2	Rep 3	Rep 4
0	D	1.0000	1.0000	1.0000	1.0000
3.4		1.0000	1.0000	1.0000	1.0000
12.5		1.0000	1.0000	1.0000	1.0000
28.3		1.0000	1.0000	1.0000	1.0000
50		1.0000	1.0000	1.0000	1.0000
100		1.0000	1.0000	1.0000	1.0000

96h Survival Rate Binomials

Conc-%	Code	Rep 1	Rep 2	Rep 3	Rep 4
0	D	10/10	10/10	10/10	10/10
3.4		10/10	10/10	10/10	10/10
12.5		10/10	10/10	10/10	10/10
28.3		10/10	10/10	10/10	10/10
50		10/10	10/10	10/10	10/10
100		10/10	10/10	10/10	10/10

Fathead Minnow 96-h Acute Survival Test — **Eurofins TestAmerica - Corvallis**

Analysis ID:	04-4598-0896	**Endpoint:**	96h Survival Rate	**CETIS Version:**	CETISv1.9.7
Analyzed:	12 Feb-21 15:10	**Analysis:**	Nonparametric-Control vs Treatments	**Status Level:**	1
Edit Date:	12 Feb-21 15:09	**MD5 Hash:**	F8C44704EB3AE9A3236D954420B5BFF7	**Editor ID:**	006-834-630-9

Data Transform	Alt Hyp	NOEL	LOEL	TOEL	TU
Angular (Corrected)	C > T	100	>100	---	1

Steel Many-One Rank Sum Test

Control	vs	Conc-%	Test Stat	Critical	Ties	DF	P-Type	P-Value	Decision(α:5%)
Dilution Water		3.4	18	10	1	6	CDF	0.8333	Non-Significant Effect
		12.5	18	10	1	6	CDF	0.8333	Non-Significant Effect
		28.3	18	10	1	6	CDF	0.8333	Non-Significant Effect
		50	18	10	1	6	CDF	0.8333	Non-Significant Effect
		100	18	10	1	6	CDF	0.8333	Non-Significant Effect

ANOVA Table

Source	Sum Squares	Mean Square	DF	F Stat	P-Value	Decision(α:5%)
Between	0	0	5			Indeterminate
Error	0	0	18			
Total	0		23			

ANOVA Assumptions Tests

Attribute	Test	Test Stat	Critical	P-Value	Decision(α:1%)
Variance	Bartlett Equality of Variance Test				Indeterminate
Distribution	Shapiro-Wilk W Normality Test				Indeterminate

96h Survival Rate Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Median	Min	Max	Std Err	CV%	%Effect
0	D	4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
3.4		4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
12.5		4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
28.3		4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
50		4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
100		4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%

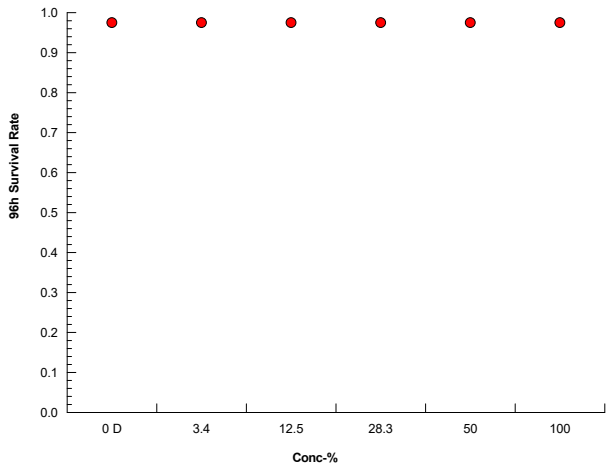
Angular (Corrected) Transformed Summary

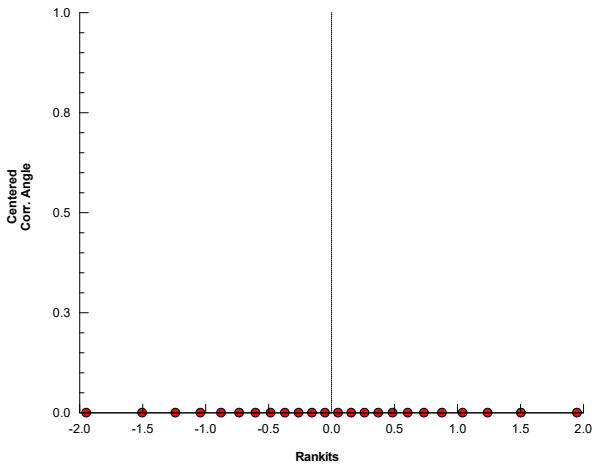
Conc-%	Code	Count	Mean	95% LCL	95% UCL	Median	Min	Max	Std Err	CV%	%Effect
0	D	4	1.4120	1.4120	1.4120	1.4120	1.4120	1.4120	0.0000	0.00%	0.00%
3.4		4	1.4120	1.4120	1.4120	1.4120	1.4120	1.4120	0.0000	0.00%	0.00%
12.5		4	1.4120	1.4120	1.4120	1.4120	1.4120	1.4120	0.0000	0.00%	0.00%
28.3		4	1.4120	1.4120	1.4120	1.4120	1.4120	1.4120	0.0000	0.00%	0.00%
50		4	1.4120	1.4120	1.4120	1.4120	1.4120	1.4120	0.0000	0.00%	0.00%
100		4	1.4120	1.4120	1.4120	1.4120	1.4120	1.4120	0.0000	0.00%	0.00%

Fathead Minnow 96-h Acute Survival Test **Eurofins TestAmerica - Corvallis**

Analysis ID:	04-4598-0896	**Endpoint:**	96h Survival Rate	**CETIS Version:**	CETISv1.9.7
Analyzed:	12 Feb-21 15:10	**Analysis:**	Nonparametric-Control vs Treatments	**Status Level:**	1
Edit Date:	12 Feb-21 15:09	**MD5 Hash:**	F8C44704EB3AE9A3236D954420B5BFF7	**Editor ID:**	006-834-630-9

Graphics





CETIS Analytical Report

Report Date: 12 Feb-21 15:10 (p 1 of 1)
Test Code/ID: B492601ppa / 14-1736-8808

Fathead Minnow 96-h Acute Survival Test — **Eurofins TestAmerica - Corvallis**

Analysis ID:	01-6011-0195	**Endpoint:**	96h Survival Rate	**CETIS Version:**	CETISv1.9.7
Analyzed:	12 Feb-21 15:10	**Analysis:**	Linear Interpolation (ICPIN)	**Status Level:**	1
Edit Date:	12 Feb-21 15:09	**MD5 Hash:**	F8C44704EB3AE9A3236D954420B5BFF7	**Editor ID:**	006-834-630-9

Linear Interpolation Options

X Transform	Y Transform	Seed	Resamples	Exp 95% CL	Method
Log(X+1)	Linear	22198	200	Yes	Two-Point Interpolation

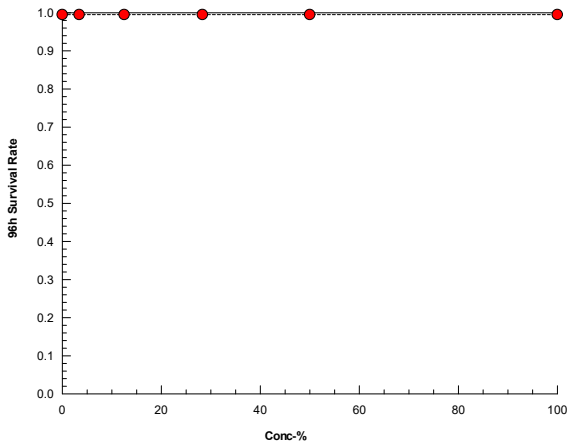
Point Estimates

Level	%	95% LCL	95% UCL	TU	95% LCL	95% UCL
EC50	>100	---	---	<1	---	---

96h Survival Rate Summary

			Calculated Variate(A/B)							Isotonic Variate	
Conc-%	Code	Count	Mean	Median	Min	Max	CV%	%Effect	A/B	Mean	%Effect
0	D	4	1.0000	1.0000	1.0000	1.0000	0.00%	0.00%	40/40	1.0000	0.00%
3.4		4	1.0000	1.0000	1.0000	1.0000	0.00%	0.00%	40/40	1.0000	0.00%
12.5		4	1.0000	1.0000	1.0000	1.0000	0.00%	0.00%	40/40	1.0000	0.00%
28.3		4	1.0000	1.0000	1.0000	1.0000	0.00%	0.00%	40/40	1.0000	0.00%
50		4	1.0000	1.0000	1.0000	1.0000	0.00%	0.00%	40/40	1.0000	0.00%
100		4	1.0000	1.0000	1.0000	1.0000	0.00%	0.00%	40/40	1.0000	0.00%

Graphics



TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

Ceriodaphnia dubia
Survival and Reproduction
Test Data Summary

Client: Inland Empire Paper Co. | Test Start Date: 1/26/2021

Sample Description: | Initial Sample ID#: B4926

Data summarized by: MB

Percent or Concentration	Total Live Young Produced in First 3 Broods per Replicate										# Alive Adults	Total Live Young
	A	B	C	D	E	F	G	H	I	J		
Control	13	17	11	12	16	18	19	18	22	12	10	158
	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?		
3.4 %	9	24	12	23	21	19	10	28	12	14	10	172
	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?		
12.5 %	12	24	23	24	20	19	23	22	18	17	10	202
	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?		
28.3 %	10	22	28	25	23	19	18	28	21	16	9	210
	AD? x	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?		
50.0 %	25	23	30	18	25	25	24	22	21	15	10	228
	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?		
100 %	14	18	24	26	21	16	23	20	16	22	10	200
	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?		

Survival data summarized through Day 7. 60%+ of surviving controls with 3+ broods first observed on Day 7.

Test Organism Mortality (Adult dead) = AD? ✓

Test Organism identified as Male = AD? M

Test Organism Injured during test = AD? I

# of Alive Adults = Number of test organism alive at termination (for WDOE only, = Number of test organisms alive at Day 7)

Total Live Young = Total neonates produced in first 3 broods

Footnote: As per EPA-600-4-91-002 and EPA-821-R-02-013, *Ceriodaphnia dubia* test should be terminated when 60% of the surviving control organisms have produced their third brood, or at the end of eight days, whichever occurs first.

Also as per EPA-821-R-02-013 (13.10.9.1), "In this three-brood test, offspring from fourth or higher broods should not be counted and should not be included in the total number of neonates produced during the test."

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

CERIODAPHNIA CHRONIC SURVIVAL AND REPRODUCTION DATA

Neo's obtained from	A	B	C	D	E	F	G	H	I	J
Culture Board ID:	2	2	2	2	2	2	2	2	2	2
Slot #:	23	24	25	26	27	28	33	3646	48	54

Bm Rec'd 1/26/21

Incubator Used: # 5
Random Template Used: 6 conc # 6

Client: Inland Empire Paper Co.
Test Initiation: Date: 1/26/2021 Time: 15:10
Sample Description:
Initial Sample ID # B 4926-01
Termination: Date: 2/2/2021 Time: 17:20

Technician: Day 0 Bm Day 1 BC Day 2 Bm Day 3 Bm Day 4 BC Day 5 Abs Day 6 Bm Day 7 Bm Day 8 ____
Time: Day 0 1510 Day 1 1630 Day 2 1010 Day 3 1130 Day 4 1505 Day 5 1341 Day 6 1620 Day 7 1720 Day 8 ____

Percent	Day	Daily Number of Live Young for each Replicate A	B	C	D	E	F	G	H	I	J	No. Live Adults	Daily Total Live Young
Control	1	0	0	0	0	0	0	0	0	0	0	10	0
	2	0	0	0	0	0	0	0	0	0	0	10	0
	3	0	0	0	0	0	0	0	0	0	0	10	0
	4	0	3	0	0	3	3	4	4	0	0	10	17
	5	4	5	4	4	6	1/0	0	4	4	5	10	37
	6	7	0	7	8	0	4	7	0	6	7	10	~~47~~ 46
	7	2/0	9	0	0	7	10	8	10	12	0	10	58
	8												
3.4 %	1	0	0	0	0	0	0	0	0	0	0	10	0
	2	0	0	0	0	0	0	0	0	0	0	10	0
	3	0	0	0	0	0	0	0	0	0	0	10	0
	4	0	4	0	0	4	4	0	6	0	0	10	18
	5	4	0	4	4	6	0	3	0	4	6	10	31
	6	5	9	8	7	0	5	0	9	8	8	10	59
	7	0	11	0	12	11	10	7	13	0	0	10	64
	8												
12.5 %	1	0	0	0	0	0	0	0	0	0	0	10	0
	2	0	0	0	0	0	0	0	0	0	0	10	0
	3	0	0	0	0	0	0	0	0	0	0	10	0
	4	0	0	0	4	3	4	0	4	4	0	10	19
	5	4	4	6	0	5	8	4	8	6	5	10	50
	6	8	7	8	8	0	7	6	10	8	12	10	74
	7	0	13	9	12	12	0	13	0	0	0	10	~~57~~ 59
	8												
28.3 %	1	0	0	0	0	0	0	0	0	0	0	10	0
	2	0	0	0	0	0	0	0	0	0	0	10	0
	3	0	0	0	0	0	0	0	0	0	0	10	0
	4	0	0	0	6	4	3	4	6	4	0	10	27
	5	3	4	6	8	4	4	6	0	0	7	10	42
	6	7	7	11	8	11	8	0	10	6	9	10	77
	7	0 AD	11	11	11	0	0	5	12	11	0	9	64
	8	↓											
50.0 %	1	0	0	0	0	0	0	0	6	0	0	10	0
	2	0	0	0	0	0	0	0	0	0	0	10	0
	3	2	8	0	0	0	0	0	0	0	0	10	0
	4	4		5	1	4	4	0	3	3	0	10	24
	5	8	5	8	6	8	10	6	8	6	5	10	70
	6	0	9	0	11	0	11	7	0	12	0	10	50
	7	13	9	17	(12)	13	0	11	11	0	10	10	~~96~~ 84 +
	8												
100 %	1	0	0	0	0	0	0	0	0	0	0	10	0
	2	0	0	0	0	0	0	0	0	0	0	10	0
	3	0	0	0	0	0	0	0	0	0	0	10	0
	4	0	4	0	5	3	2	5	4	3	3	10	29
	5	0	0	5	0	6	8	10	4	7	0	10	44
	6	10	7	8	10	0	0	0	0	6	8	10	49
	7	4	7	11	11	12	6	8	8	0	11	10	78
	8												

R06 MB 2/12/21

R06 MB 2/12/21

"AD" = Adult Dead, "AY" = Aborted young, "M" = male organism, "F" = Female, "R" = Adult releasing young, " / " = split brood (carry-over brood / current day brood), "Inj" = Adult Injured during test solution renewal, replicate removed from analysis. "AM" = Adult missing, remove from analysis. A circled neonate count = 4th brood

Footnote: As per WDOE, C. dubia test reproduction should be when 60% of the surviving control organisms have produced their third brood (Days 6, 7, or 8). Survival is at seven days.

TestAmerica

CERIODAPHNIA WATER QUALITY DATA

Client: Inland Empire Paper Co.
Sample Description:
Initiated Date: 1/26/2021 Time: 15:10
Initial Sample ID #: B 4926 - 01

Adults Isolated Date: 1/25/2021 Time: 17:17
Neo's Collected Date: 1/25/2021 Time: 23:06

	Day 0	Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7	Day 8
Tech:	BM	BC	BM	BM	BC	ABC	BM	BM	
Time	15:55	12:15	10:15	16:55	15:55 (1/27/21)	14:21	10:30	17:25	:
Therm. #	252	251	251	251	251	251	251	251	#

Dissolved Oxygen (mg/l)

%	Day 0	Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7	Day 8
Control	8.0	8.2 / 7.6	7.9 / 7.8	8.9 / 8.5	8.0 / 7.8	7.9 / 7.9	7.6 / 7.4	7.8	
3.4 %	8.0	8.3 / 7.7	7.9 / 7.9	8.9 / 8.4	8.0 / 7.6	8.1 / 7.8	7.7 / 7.6	7.8	
12.5 %	7.9	8.3 / 7.9	8.0 / 7.9	9.0 / 8.1	8.0 / 7.5	8.0 / 7.8	7.8 / 7.3	7.9	
28.3 %	8.0	8.3 / 7.9	8.0 / 8.0	8.9 / 8.2	8.1 / 7.6	8.2 / 7.8	7.9 / 7.2	7.9	
50.0 %	8.0	8.3 / 8.0	8.0 / 8.1	8.8 / 8.3	8.1 / 7.7	8.3 / 7.8	7.9 / 7.3	8.0	
100 %	8.0	8.3 / 7.9	8.1 / 8.2	8.6 / 8.1	7.9 / 7.7	8.4 / 7.8	8.0 / 7.3	8.1	

pH

%	Day 0	Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7	Day 8
Control	8.0	7.7 / 8.0	7.9 / 8.0	8.1 / 8.3	8.1 / 8.3	8.1 / 8.0	8.0 / 7.9	7.9	
3.4 %	8.1	7.8 / 8.0	8.0 / 8.1	8.1 / 8.2	8.2 / 8.2	8.1 / 8.0	8.1 / 7.9	8.0	
12.5 %	8.1	8.1 / 8.1	8.1 / 8.1	8.3 / 8.3	8.3 / 8.2	8.3 / 8.0	8.2 / 8.1	8.1	
28.3 %	8.1	8.3 / 8.1	8.4 / 8.1	8.5 / 8.4	8.5 / 8.3	8.5 / 8.2	8.4 / 8.1	8.3	
50.0 %	8.2	8.4 / 8.2	8.5 / 8.2	8.7 / 8.4	8.7 / 8.3	8.6 / 8.2	8.6 / 8.2	8.5	
100 %	8.3	8.7 / 8.4	8.7 / 8.2	8.8 / 8.6	8.8 / 8.4	8.8 / 8.3	8.8 / 8.3	8.7	

Temperature (°C) / Conductivity (µS) (1st use of each sample only)

%	Day 0	Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7	Day 8
Control	25.9 / 317	24.6	24.2 / 322	25.4	24.9 / 338	24.4	25.6	23.4	
3.4 %	25.7 / 347	23.9	23.4 / 348	25.2	24.1	24.0	24.8	23.7	
12.5 %	25.4 / 421	23.2	23.9 / 423	25.3	25.4	23.9	24.4	23.2	
28.3 %	25.4 / 546	24.6	24.2 / 546	25.8	25.2	25.1	25.4	23.3	
50.0 %	25.3 / 724	24.1	24.3 / 713	24.6	24.5	24.7	24.7	23.2	
100 %	25.7 / 1113	23.5	24.6 / 1100	25.4	24.3 / 1008	24.4	24.4	23.3	

COMMENTS: Temperatures taken just prior to test solution renewals. DO, pH, and Conductivity taken following organism transfer.

BM 1/26 20:12

23.8 = Temp out of recom. range

Note: All Day 0 data represents conditions at initiation. All other days: numerator represents pre-renewal conditions, denominator represents post-renewal conditions.

Ceriodaphnia 7-d Survival and Reproduction Test — **Eurofins TestAmerica - Corvallis**

Batch ID:	05-3212-7795	**Test Type:**	Reproduction-Survival (7d)	**Analyst:**	Michelle Bennett		
Start Date:	26 Jan-21 15:10	**Protocol:**	EPA/821/R-02-013 (2002)	**Diluent:**	Mod-Hard Synthetic Water		
Ending Date:	02 Feb-21 17:20	**Species:**	Ceriodaphnia dubia	**Brine:**			
Test Length:	7d 2h	**Taxon:**		**Source:**	In-House Culture	**Age:**	<24

Sample ID:	06-5598-2434	**Code:**	B4926-01	**Project:**			
Sample Date:	25 Jan-21 07:00	**Material:**	Industrial Effluent	**Source:**	Inland Empire Paper (WA0000825)		
Receipt Date:	26 Jan-21 10:30	**CAS (PC):**		**Station:**			
Sample Age:	32h (1.1 °C)	**Client:**					

Multiple Comparison Summary

Analysis ID	Endpoint	Comparison Method	✓	NOEL	LOEL	TOEL	PMSD	TU	S
10-2810-5763	7d Survival Rate	Fisher Exact/Bonferroni-Holm Test		100	>100	---	---	1	1
15-2821-1918	Reproduction	Dunnett Multiple Comparison Test		100	>100	---	30.8%	1	1

Point Estimate Summary

Analysis ID	Endpoint	Point Estimate Method	✓	Level	%	95% LCL	95% UCL	TU	S
18-7415-1729	Reproduction	Linear Interpolation (ICPIN)		IC25	>100	---	---	<1	1

Test Acceptability

				TAC Limits			
Analysis ID	**Endpoint**	**Attribute**	**Test Stat**	**Lower**	**Upper**	**Overlap**	**Decision**
10-2810-5763	7d Survival Rate	Control Resp	1	0.8	>>	Yes	Passes Criteria
15-2821-1918	Reproduction	Control Resp	15.8	15	>>	Yes	Passes Criteria
18-7415-1729	Reproduction	Control Resp	15.8	15	>>	Yes	Passes Criteria
15-2821-1918	Reproduction	PMSD	0.308	0.13	0.47	Yes	Passes Criteria

7d Survival Rate Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Min	Max	Std Err	Std Dev	CV%	%Effect
0	D	10	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
3.4		10	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
12.5		10	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
28.3		10	0.9000	0.6738	1.1260	0.0000	1.0000	0.1000	0.3162	35.14%	10.00%
50		10	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
100		10	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%

Reproduction Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Min	Max	Std Err	Std Dev	CV%	%Effect
0	D	10	15.8	13.19	18.41	11	22	1.153	3.645	23.07%	0.00%
3.4		10	17.2	12.45	21.95	9	28	2.102	6.647	38.64%	-8.86%
12.5		10	20.2	17.46	22.94	12	24	1.209	3.824	18.93%	-27.85%
28.3		10	21	17.02	24.98	10	28	1.758	5.558	26.47%	-32.91%
50		10	22.8	19.83	25.77	15	30	1.315	4.158	18.24%	-44.30%
100		10	20	17.2	22.8	14	26	1.238	3.916	19.58%	-26.58%

Ceriodaphnia 7-d Survival and Reproduction Test **Eurofins TestAmerica - Corvallis**

7d Survival Rate Detail MD5: 47A929505FF684089217E8F2D4BDE4D4

Conc-%	Code	Rep 1	Rep 2	Rep 3	Rep 4	Rep 5	Rep 6	Rep 7	Rep 8	Rep 9	Rep 10
0	D	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
3.4		1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
12.5		1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
28.3		0.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
50		1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
100		1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000

Reproduction Detail MD5: 752512D8A19431A81368EE55CD5C561A

Conc-%	Code	Rep 1	Rep 2	Rep 3	Rep 4	Rep 5	Rep 6	Rep 7	Rep 8	Rep 9	Rep 10
0	D	13	17	11	12	16	18	19	18	22	12
3.4		9	24	12	23	21	19	10	28	12	14
12.5		12	24	23	24	20	19	23	22	18	17
28.3		10	22	28	25	23	19	18	28	21	16
50		25	23	30	18	25	25	24	22	21	15
100		14	18	24	26	21	16	23	20	16	22

7d Survival Rate Binomials

Conc-%	Code	Rep 1	Rep 2	Rep 3	Rep 4	Rep 5	Rep 6	Rep 7	Rep 8	Rep 9	Rep 10
0	D	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
3.4		1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
12.5		1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
28.3		0/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
50		1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
100		1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1

Ceriodaphnia 7-d Survival and Reproduction Test — **Eurofins TestAmerica - Corvallis**

Analysis ID:	10-2810-5763	**Endpoint:**	7d Survival Rate	**CETIS Version:**	CETISv1.9.7
Analyzed:	12 Feb-21 15:30	**Analysis:**	STP 2xK Contingency Tables	**Status Level:**	1
Edit Date:	12 Feb-21 15:29	**MD5 Hash:**	47A929505FF684089217E8F2D4BDE4D4	**Editor ID:**	006-834-630-9

Data Transform	Alt Hyp	NOEL	LOEL	TOEL	TU
Untransformed	C > T	100	>100	---	1

Fisher Exact/Bonferroni-Holm Test

Control	vs	Conc-%	Test Stat	P-Type	P-Value	Decision(α:5%)
Dilution Water		3.4	1.0000	Exact	1.0000	Non-Significant Effect
		12.5	1.0000	Exact	1.0000	Non-Significant Effect
		28.3	0.5000	Exact	1.0000	Non-Significant Effect
		50	1.0000	Exact	1.0000	Non-Significant Effect
		100	1.0000	Exact	1.0000	Non-Significant Effect

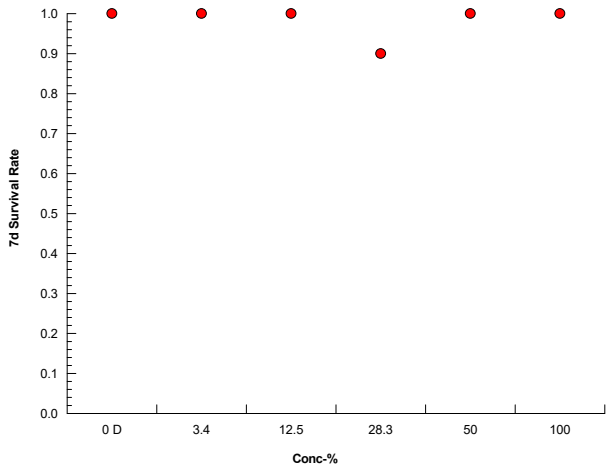
7d Survival Rate Frequencies

Conc-%	Code	NR	R	NR + R	Prop NR	Prop R	%Effect
0	D	10	0	10	1.0000	0.0000	0.00%
3.4		10	0	10	1.0000	0.0000	0.00%
12.5		10	0	10	1.0000	0.0000	0.00%
28.3		9	1	10	0.9000	0.1000	10.00%
50		10	0	10	1.0000	0.0000	0.00%
100		10	0	10	1.0000	0.0000	0.00%

7d Survival Rate Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Median	Min	Max	Std Err	CV%	%Effect
0	D	10	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
3.4		10	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
12.5		10	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
28.3		10	0.9000	0.6738	1.0000	1.0000	0.0000	1.0000	0.1000	35.14%	10.00%
50		10	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
100		10	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%

Graphics



Ceriodaphnia 7-d Survival and Reproduction Test — **Eurofins TestAmerica - Corvallis**

Analysis ID:	15-2821-1918	**Endpoint:**	Reproduction	**CETIS Version:**	CETISv1.9.7
Analyzed:	12 Feb-21 15:30	**Analysis:**	Parametric-Control vs Treatments	**Status Level:**	1
Edit Date:	12 Feb-21 15:29	**MD5 Hash:**	81B6763C5B3C79CDD73E998E122780F5	**Editor ID:**	006-834-630-9

Data Transform	Alt Hyp	NOEL	LOEL	TOEL	TU	MSDu	PMSD
Untransformed	C > T	100	>100	---	1	4.867	30.80%

Dunnett Multiple Comparison Test

Control	vs	Conc-%	Test Stat	Critical	MSD	DF	P-Type	P-Value	Decision(α:5%)
Dilution Water		3.4	-0.6585	2.289	4.867	18	CDF	0.9599	Non-Significant Effect
		12.5	-2.07	2.289	4.867	18	CDF	0.9996	Non-Significant Effect
		28.3	-2.446	2.289	4.867	18	CDF	0.9999	Non-Significant Effect
		50	-3.293	2.289	4.867	18	CDF	1.0000	Non-Significant Effect
		100	-1.976	2.289	4.867	18	CDF	0.9995	Non-Significant Effect

ANOVA Table

Source	Sum Squares	Mean Square	DF	F Stat	P-Value	Decision(α:5%)
Between	328.6	65.72	5	2.908	0.0214	Significant Effect
Error	1220.4	22.6	54			
Total	1549		59			

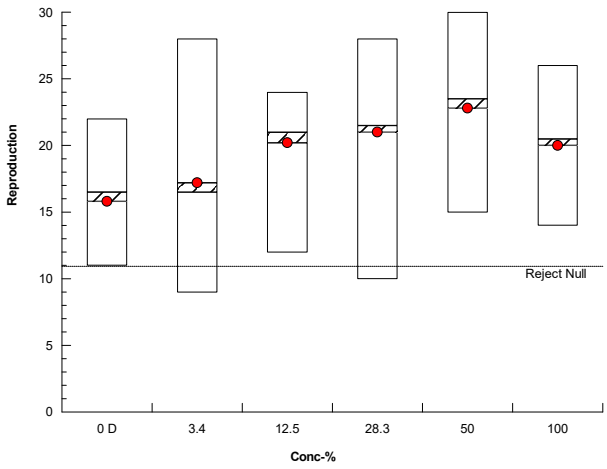
ANOVA Assumptions Tests

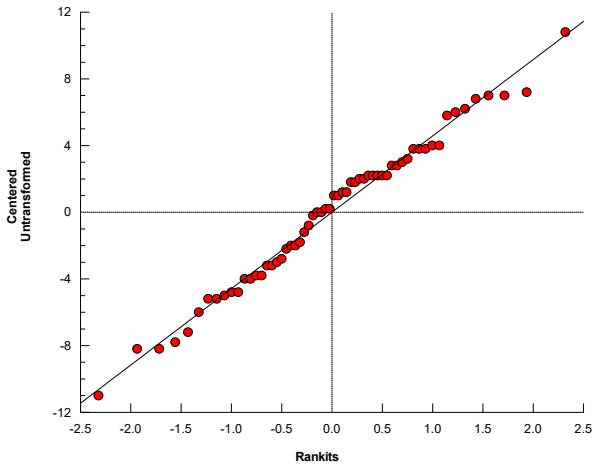
Attribute	Test	Test Stat	Critical	P-Value	Decision(α:1%)
Variance	Bartlett Equality of Variance Test	5.517	15.09	0.3561	Equal Variances
Distribution	Shapiro-Wilk W Normality Test	0.9863	0.9459	0.7381	Normal Distribution

Reproduction Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Median	Min	Max	Std Err	CV%	%Effect
0	D	10	15.8	13.19	18.41	16.5	11	22	1.153	23.07%	0.00%
3.4		10	17.2	12.45	21.95	16.5	9	28	2.102	38.64%	-8.86%
12.5		10	20.2	17.46	22.94	21	12	24	1.209	18.93%	-27.85%
28.3		10	21	17.02	24.98	21.5	10	28	1.758	26.47%	-32.91%
50		10	22.8	19.83	25.77	23.5	15	30	1.315	18.24%	-44.30%
100		10	20	17.2	22.8	20.5	14	26	1.238	19.58%	-26.58%

Graphics





Ceriodaphnia 7-d Survival and Reproduction Test — **Eurofins TestAmerica - Corvallis**

Analysis ID:	18-7415-1729	**Endpoint:**	Reproduction	**CETIS Version:**	CETISv1.9.7
Analyzed:	12 Feb-21 15:30	**Analysis:**	Linear Interpolation (ICPIN)	**Status Level:**	1
Edit Date:	12 Feb-21 15:29	**MD5 Hash:**	81B6763C5B3C79CDD73E998E122780F5	**Editor ID:**	006-834-630-9

Linear Interpolation Options

X Transform	Y Transform	Seed	Resamples	Exp 95% CL	Method
Log(X+1)	Linear	1044054	200	Yes	Two-Point Interpolation

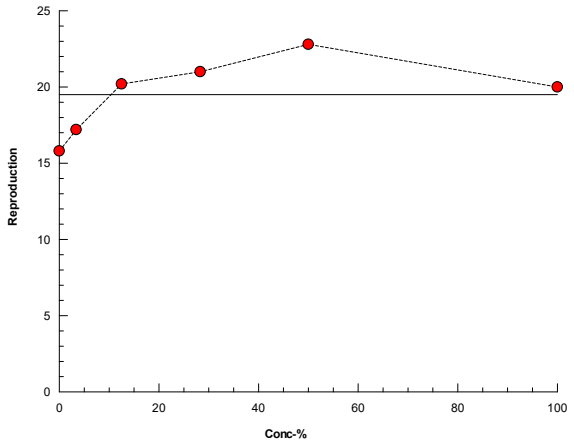
Point Estimates

Level	%	95% LCL	95% UCL	TU	95% LCL	95% UCL
IC25	>100	---	---	<1	---	---

Reproduction Summary

			Calculated Variate						Isotonic Variate	
Conc-%	**Code**	**Count**	**Mean**	**Median**	**Min**	**Max**	**CV%**	**%Effect**	**Mean**	**%Effect**
0	D	10	15.8	16.5	11	22	23.07%	0.00%	19.5	0.00%
3.4		10	17.2	16.5	9	28	38.64%	-8.86%	19.5	0.00%
12.5		10	20.2	21	12	24	18.93%	-27.85%	19.5	0.00%
28.3		10	21	21.5	10	28	26.47%	-32.91%	19.5	0.00%
50		10	22.8	23.5	15	30	18.24%	-44.30%	19.5	0.00%
100		10	20	20.5	14	26	19.58%	-26.58%	19.5	0.00%

Graphics



TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

FATHEAD MINNOW 7-DAY SURVIVAL AND WATER QUALITY DATA

Random Template Used: 6 conc. x 4 reps. # 10 | Waterbath/incubator Used: # 10 | Date Initiated 1/26/2021 Time 15:14

Initial sample ID B 49260 - 01 | Date Terminated 2/2/2021 Time 13:30

Client: Inland Empire Paper Co. | Sample Description:

Tech: Day 0 ~~MM~~/TC Day 1 TC Day 2 BC Day 3 BL Day 4 ~~BC~~ Day 5 TC Day 6 TC Day 7 BC

Time: Day 0 1514 Day 1 1402 Day 2 1485 Day 3 1355 Day 4 1415 Day 5 1145 Day 6 1113 Day 7 1330

Conc. or Percent	Day	Number of Live Organisms				Dissolved O_2 (mg/l)		pH		Temp. (°C)	Therm. ID #	Conductivity (µS)
		A	B	C	D	Pre	Post	Pre	Post	Pre		Post (1st use)
Control	0	10 9	10	10	10		8.0		8.0	Post: 25.2	252	312
	1	10	10	10	10	7.1	8.1	7.8	8.5	24.0	251	
	2	9 M	10	10	10	6.4	7.9	7.1	8.0	24.9	251	313
	3	9	10	10	10	6.6	8.1	7.2	8.4	24.8	251	
	4	9 ✓ 9	10 ✓	10	10	6.7	8.0	7.3	8.3	24.9	251	332
	5		10 ✓	10 ✓	10 ✓	6.9	8.1	7.5	8.4	25.1	251	
	6	9 ✓	10 ✓	10	10 ✓	6.5	8.1	7.5	8.4	25.1	251	
	7	9	10	10	10	6.5		7.1		25.1	251	
3.4 %	0	Pc Dec 10 9 10	10	10	10		8.3		8.0	Post: 25.3		299
	1	10	10	10	10 ✓	6.5	8.1	7.7	8.4	24.6		
	2	10	10	10	10	6.4	8.0	7.1	8.0	24.8		344
	3	Pc Dec 10 9 9	10	10	10	6.7	8.2	7.6	8.4	24.7		
	4		10	10	10	6.8	8.1	7.5	8.2	24.6		360
	5	9	10	10	10	6.7	8.3	7.5	8.4	25.0		
	6	9	10	10	10 ✓	6.6	8.2	7.5	8.3	25.2		
	7	9	10	10	10	6.7		7.2		24.9		
12.5 %	0	10	10	10	10		8.3		8.0	Post: 24.9		420
	1	10	10	10	10	6.9	8.3	8.0	8.3	25.1		
	2	10	10	10	10	6.3	8.0	7.2	8.0	25.1		420
	3	10	10	10	10	6.6	8.3	7.5	8.4	24.8		
	4	10	10	10	10	6.9	8.2	7.7	8.2	24.9		422
	5	10 ✓	10	10	10 ✓ ✓	6.9	8.4	7.9	8.3	24.9		
	6	10 ✓	10 ✓	10	10	6.7	8.4	7.8	8.3	25.1		
	7	10	10	10	10	6.8		7.4		25.1		
28.3 %	0	10	10	10	10		8.5		8.0	Post: 25.3		548
	1	10	10	10	10	6.9	8.4	8.2	8.3	25.1		
	2	10	10	10	10	6.2	8.0	7.7	8.0	24.9		558
	3	10	10	10 ✓	10	6.8	8.4	8.1	8.3	25.1		
	4	10	10	10	10	6.8	8.3	7.9	8.1	25.1		529
	5	10	10	10	10	6.9	8.6	8.1	8.3	25.1		
	6	10	10	10	10 ✓	6.9	8.7	8.0	8.2	25.3		
	7	10	10	10	10	6.5		7.6		25.3		
50.0 %	0	10	10	10	10		8.6		8.1	Post: 24.9		727
	1	10	10	10	10	7.0	8.7	8.4	8.3	24.5		
	2	10	10	10	10	6.2	8.1	8.0	8.0	25.1		714
	3	10	10	10	10	6.9	8.7	8.2	8.3	25.1		
	4	10	10	10	10	6.9	8.6	8.1	8.1	24.7		6776
	5	10	10	10	10 ✓ ✓	6.8	8.8	8.3	8.2	25.1		
	6	10 ✓	10	10	10 ✓	6.8	9.0	8.2	8.2	25.2		
	7	10	10	10	10	6.6		8.0		25.3		
100 %	0	10	10	10	10		8.8		8.1	Post: 25.3		1129
	1	10	10	10	9	6.9	9.0	8.5	8.2	25.0		
	2	10	10	10	9	6.3	8.2	8.3	8.1	24.8		1098
	3	10	10	10	9	6.9	9.1	8.4	8.2	24.9		
	4	10	10	10	9	6.9	8.9	8.4	8.1	24.8		1008
	5	10	10	10	9 ✓	6.7	8.3	8.4	8.2	25.4		
	6	10	10	10	9	6.6	8.0	8.4	8.1	25.4		
	7	10	10	10	9	6.7		8.3		25.3		

✓ Indicates one organism inadvertently poured off during solution renewal, replaced into container.

"M" = organism missing, start count reduced. "Inj" = organism injured, remove from stats.

"F" = fungus noted on dead organisms.

☐ Aeration in test chambers begun @ _____ (Note observations on Test Organism Info sheet)

Pre =Pre-renewal solutions. Post =Post-renewal solutions.

Day 0 Temperatures = Post-renewals

Therm ID# = Thermometer ID used for all measurements that day.

(23.8) = Temp. out of recommended range

FATHEAD MINNOW 7-DAY GROWTH DATA

Client: Inland Empire Paper Co | Tins Labeled As: Inland

Lab ID: B4926 | Start Date: 1/26/2021

Sample Description:

Technician:	TC	ABL
Date:	2/15/2021	2/1/2021
Balance Serial #:	B328543647	B328543647

Percent	Replicate	Total Weight (mg)	Tare Weight (mg)	No. of Fish
Control	A	1048.34	1039.08	9 of 9
	B	1042.40	1033.71	10
	C	1032.19	1023.47	10
	D	1037.93	1029.45	10
3.4 %	A	1039.05	1030.29	9
	B	1044.30	1034.01	10
	C	1040.16	1031.09	10
	D	1033.34	1024.66	10
12.5 %	A	1021.53	1010.50	10
	B	1024.35	1013.79	10
	C	1029.04	1018.17	10
	D	1055.42	1045.72	10
28.3 %	A	1039.26	1030.52	10
	B	1027.38	1016.55	10
	C	1042.38	1032.12	10
	D	1030.52	1019.33	10
50 %	A	1050.35	1038.46	10
	B	1036.59	1025.19	10
	C	1046.10	1035.44	10
	D	1037.74	1028.89	10
100 %	A	1047.83	1035.56	10
	B	1034.71	1023.70	10
	C	1030.51	1021.22	10
	D	1023.03	1013.87	9
	A			
	B			
	C			
	D			

weigh to 0.01 mg

FATHEAD MINNOW 7-DAY GROWTH DATA

Client: Inland Empire Paper Co | Tins Labeled As: Inland

Lab ID: B4926 | Start Date: 1/26/2021

Sample Description:

Technician:		ABL
Date:		2/1/2021
Balance Serial #:	B328543647	B328543647

Percent	Replicate	Total Weight (mg)	Tare Weight (mg)	No. of Fish
Control	A		1039.08	9 of 9
	B		1033.71	10
	C		1023.47	10
	D		1029.45	10
3.4 %	A		1030.29	9
	B		1034.01	10
	C		1031.09	10
	D		1024.66	10
12.5 %	A		1010.50	10
	B		1013.79	10
	C		1018.17	10
	D		1045.72	10
28.3 %	A		1030.52	10
	B		1016.55	10
	C		1032.12	10
	D		1019.33	10
50 %	A		1038.46	10
	B		1025.19	10
	C		1035.44	10
	D		1028.89	10
100 %	A		1035.56	10
	B		1023.70	10
	C		1021.22	10
	D		1013.87	9
	A			
	B			
	C			
	D			

weigh to 0.01 mg

Fathead Minnow 7-d Larval Survival and Growth Test — **Eurofins TestAmerica - Corvallis**

Batch ID:	05-5452-8909	**Test Type:**	Growth-Survival (7d)	**Analyst:**	Michelle Bennett		
Start Date:	26 Jan-21 15:14	**Protocol:**	EPA/821/R-02-013 (2002)	**Diluent:**	Mod-Hard Synthetic Water		
Ending Date:	02 Feb-21 13:30	**Species:**	Pimephales promelas	**Brine:**			
Test Length:	6d 22h	**Taxon:**	Actinopterygii	**Source:**	Aquatox, AR	**Age:**	1D
Sample ID:	06-5598-2434	**Code:**	B4926-01	**Project:**			
Sample Date:	25 Jan-21 07:00	**Material:**	Industrial Effluent	**Source:**	Inland Empire Paper (WA0000825)		
Receipt Date:	26 Jan-21 10:30	**CAS (PC):**		**Station:**			
Sample Age:	32h (1.1 °C)	**Client:**					

Multiple Comparison Summary

Analysis ID	Endpoint	Comparison Method	✓	NOEL	LOEL	TOEL	PMSD	TU	S
05-5439-9176	7d Survival Rate	Steel Many-One Rank Sum Test		100	>100	---	5.7%	1	1
10-3340-0958	Mean Dry Biomass-mg	Dunnett Multiple Comparison Test		100	>100	---	20.0%	1	1

Point Estimate Summary

Analysis ID	Endpoint	Point Estimate Method	✓	Level	%	95% LCL	95% UCL	TU	S
17-4064-1329	Mean Dry Biomass-mg	Linear Interpolation (ICPIN)		IC25	>100	---	---	<1	1

Test Acceptability

				TAC Limits			
Analysis ID	**Endpoint**	**Attribute**	**Test Stat**	**Lower**	**Upper**	**Overlap**	**Decision**
05-5439-9176	7d Survival Rate	Control Resp	1	0.8	>>	Yes	Passes Criteria
10-3340-0958	Mean Dry Biomass-mg	Control Resp	0.9045	0.25	>>	Yes	Passes Criteria
17-4064-1329	Mean Dry Biomass-mg	Control Resp	0.9045	0.25	>>	Yes	Passes Criteria
10-3340-0958	Mean Dry Biomass-mg	PMSD	0.1998	0.12	0.3	Yes	Passes Criteria

7d Survival Rate Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Min	Max	Std Err	Std Dev	CV%	%Effect
0	D	4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
3.4		4	0.9750	0.8954	1.0550	0.9000	1.0000	0.0250	0.0500	5.13%	2.50%
12.5		4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
28.3		4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
50		4	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	---	0.00%
100		4	0.9750	0.8954	1.0550	0.9000	1.0000	0.0250	0.0500	5.13%	2.50%

Mean Dry Biomass-mg Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Min	Max	Std Err	Std Dev	CV%	%Effect
0	D	4	0.9045	0.7714	1.038	0.848	1.029	0.04181	0.08363	9.25%	0.00%
3.4		4	0.92	0.8013	1.039	0.868	1.029	0.0373	0.07459	8.11%	-1.72%
12.5		4	1.054	0.9596	1.148	0.97	1.103	0.02965	0.0593	5.63%	-16.53%
28.3		4	1.026	0.8536	1.197	0.874	1.119	0.05401	0.108	10.53%	-13.38%
50		4	1.07	0.8579	1.282	0.885	1.189	0.06665	0.1333	12.46%	-18.30%
100		4	1.043	0.8066	1.28	0.916	1.227	0.07435	0.1487	14.25%	-15.34%

Fathead Minnow 7-d Larval Survival and Growth Test **Eurofins TestAmerica - Corvallis**

7d Survival Rate Detail MD5: F27CD06C64B5D2F28E9384165C7B2645

Conc-%	Code	Rep 1	Rep 2	Rep 3	Rep 4
0	D	1.0000	1.0000	1.0000	1.0000
3.4		0.9000	1.0000	1.0000	1.0000
12.5		1.0000	1.0000	1.0000	1.0000
28.3		1.0000	1.0000	1.0000	1.0000
50		1.0000	1.0000	1.0000	1.0000
100		1.0000	1.0000	1.0000	0.9000

Mean Dry Biomass-mg Detail MD5: 920D99AB46587FC8FADC1621E3F3E337

Conc-%	Code	Rep 1	Rep 2	Rep 3	Rep 4
0	D	1.029	0.869	0.872	0.848
3.4		0.876	1.029	0.907	0.868
12.5		1.103	1.056	1.087	0.97
28.3		0.874	1.083	1.026	1.119
50		1.189	1.14	1.066	0.885
100		1.227	1.101	0.929	0.916

7d Survival Rate Binomials

Conc-%	Code	Rep 1	Rep 2	Rep 3	Rep 4
0	D	9/9	10/10	10/10	10/10
3.4		9/10	10/10	10/10	10/10
12.5		10/10	10/10	10/10	10/10
28.3		10/10	10/10	10/10	10/10
50		10/10	10/10	10/10	10/10
100		10/10	10/10	10/10	9/10

Fathead Minnow 7-d Larval Survival and Growth Test — **Eurofins TestAmerica - Corvallis**

Analysis ID:	05-5439-9176	**Endpoint:**	7d Survival Rate	**CETIS Version:**	CETISv1.9.7
Analyzed:	16 Feb-21 14:15	**Analysis:**	Nonparametric-Control vs Treatments	**Status Level:**	1
Edit Date:	16 Feb-21 14:15	**MD5 Hash:**	F27CD06C64B5D2F28E9384165C7B2645	**Editor ID:**	006-834-630-9

Data Transform	Alt Hyp	NOEL	LOEL	TOEL	TU	MSDu	PMSD
Angular (Corrected)	C > T	100	>100	---	1	0.057	5.70%

Steel Many-One Rank Sum Test

Control	vs	Conc-%	Test Stat	Critical	Ties	DF	P-Type	P-Value	Decision(α:5%)
Dilution Water		3.4	16	10	1	6	CDF	0.6105	Non-Significant Effect
		12.5	18	10	1	6	CDF	0.8333	Non-Significant Effect
		28.3	18	10	1	6	CDF	0.8333	Non-Significant Effect
		50	18	10	1	6	CDF	0.8333	Non-Significant Effect
		100	16	10	1	6	CDF	0.6105	Non-Significant Effect

ANOVA Table

Source	Sum Squares	Mean Square	DF	F Stat	P-Value	Decision(α:5%)
Between	0.0086333	0.0017267	5	0.779	0.5776	Non-Significant Effect
Error	0.0398953	0.0022164	18			
Total	0.0485287		23			

ANOVA Assumptions Tests

Attribute	Test	Test Stat	Critical	P-Value	Decision(α:1%)
Variance	Bartlett Equality of Variance Test				Indeterminate
Distribution	Shapiro-Wilk W Normality Test	0.6328	0.884	<1.0E-05	Non-Normal Distribution

7d Survival Rate Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Median	Min	Max	Std Err	CV%	%Effect
0	D	4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
3.4		4	0.9750	0.8954	1.0000	1.0000	0.9000	1.0000	0.0250	5.13%	2.50%
12.5		4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
28.3		4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
50		4	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.00%	0.00%
100		4	0.9750	0.8954	1.0000	1.0000	0.9000	1.0000	0.0250	5.13%	2.50%

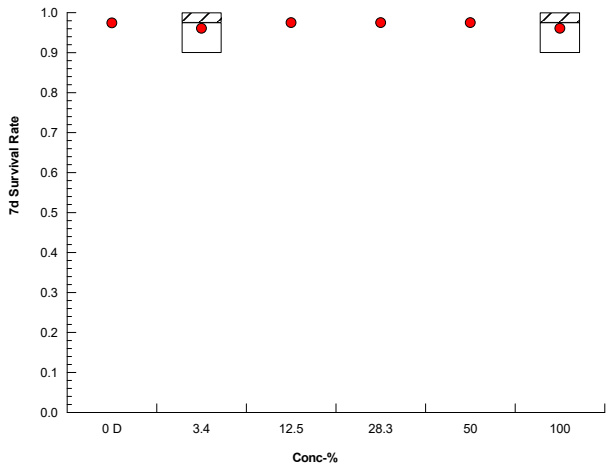
Angular (Corrected) Transformed Summary

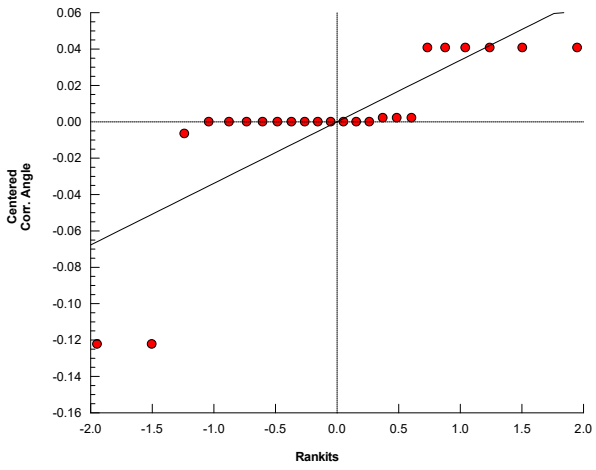
Conc-%	Code	Count	Mean	95% LCL	95% UCL	Median	Min	Max	Std Err	CV%	%Effect
0	D	4	1.4100	1.4030	1.4170	1.4120	1.4030	1.4120	0.0022	0.31%	0.00%
3.4		4	1.3710	1.2420	1.5010	1.4120	1.2490	1.4120	0.0407	5.94%	2.74%
12.5		4	1.4120	1.4120	1.4120	1.4120	1.4120	1.4120	0.0000	0.00%	-0.15%
28.3		4	1.4120	1.4120	1.4120	1.4120	1.4120	1.4120	0.0000	0.00%	-0.15%
50		4	1.4120	1.4120	1.4120	1.4120	1.4120	1.4120	0.0000	0.00%	-0.15%
100		4	1.3710	1.2420	1.5010	1.4120	1.2490	1.4120	0.0407	5.94%	2.74%

Fathead Minnow 7-d Larval Survival and Growth Test — **Eurofins TestAmerica - Corvallis**

Analysis ID:	05-5439-9176	**Endpoint:**	7d Survival Rate	**CETIS Version:**	CETISv1.9.7
Analyzed:	16 Feb-21 14:15	**Analysis:**	Nonparametric-Control vs Treatments	**Status Level:**	1
Edit Date:	16 Feb-21 14:15	**MD5 Hash:**	F27CD06C64B5D2F28E9384165C7B2645	**Editor ID:**	006-834-630-9

Graphics





Fathead Minnow 7-d Larval Survival and Growth Test — **Eurofins TestAmerica - Corvallis**

Analysis ID:	10-3340-0958	**Endpoint:**	Mean Dry Biomass-mg	**CETIS Version:**	CETISv1.9.7
Analyzed:	16 Feb-21 14:15	**Analysis:**	Parametric-Control vs Treatments	**Status Level:**	1
Edit Date:	16 Feb-21 14:15	**MD5 Hash:**	920D99AB46587FC8FADC1621E3F3E337	**Editor ID:**	006-834-630-9

Data Transform	Alt Hyp	NOEL	LOEL	TOEL	TU	MSDu	PMSD
Untransformed	C > T	100	>100	---	1	0.1807	19.98%

Dunnett Multiple Comparison Test

Control	vs	Conc-%	Test Stat	Critical	MSD	DF	P-Type	P-Value	Decision(α:5%)
Dilution Water		3.4	-0.2068	2.407	0.181	6	CDF	0.8870	Non-Significant Effect
		12.5	-1.992	2.407	0.181	6	CDF	0.9991	Non-Significant Effect
		28.3	-1.612	2.407	0.181	6	CDF	0.9971	Non-Significant Effect
		50	-2.205	2.407	0.181	6	CDF	0.9995	Non-Significant Effect
		100	-1.849	2.407	0.181	6	CDF	0.9986	Non-Significant Effect

ANOVA Table

Source	Sum Squares	Mean Square	DF	F Stat	P-Value	Decision(α:5%)
Between	0.10325	0.0206499	5	1.832	0.1572	Non-Significant Effect
Error	0.202865	0.0112703	18			
Total	0.306114		23			

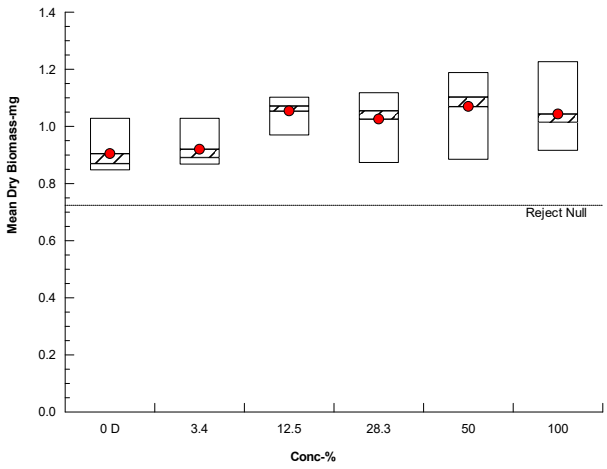
ANOVA Assumptions Tests

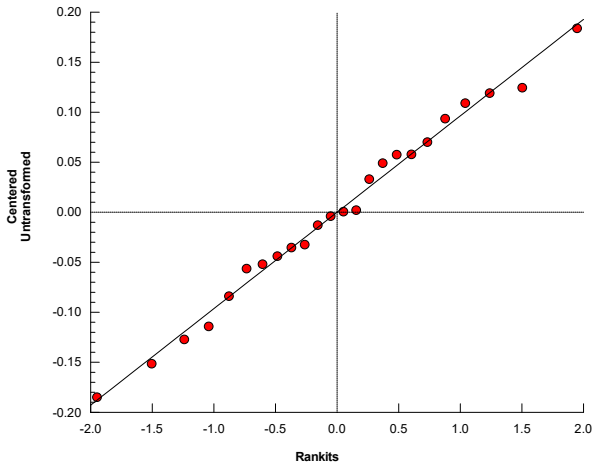
Attribute	Test	Test Stat	Critical	P-Value	Decision(α:1%)
Variance	Bartlett Equality of Variance Test	3.144	15.09	0.6777	Equal Variances
Distribution	Shapiro-Wilk W Normality Test	0.9871	0.884	0.9844	Normal Distribution

Mean Dry Biomass-mg Summary

Conc-%	Code	Count	Mean	95% LCL	95% UCL	Median	Min	Max	Std Err	CV%	%Effect
0	D	4	0.9045	0.7714	1.038	0.8705	0.848	1.029	0.04181	9.25%	0.00%
3.4		4	0.92	0.8013	1.039	0.8915	0.868	1.029	0.0373	8.11%	-1.72%
12.5		4	1.054	0.9596	1.148	1.072	0.97	1.103	0.02965	5.63%	-16.53%
28.3		4	1.026	0.8536	1.197	1.055	0.874	1.119	0.05401	10.53%	-13.38%
50		4	1.07	0.8579	1.282	1.103	0.885	1.189	0.06665	12.46%	-18.30%
100		4	1.043	0.8066	1.28	1.015	0.916	1.227	0.07435	14.25%	-15.34%

Graphics





Fathead Minnow 7-d Larval Survival and Growth Test — **Eurofins TestAmerica - Corvallis**

Analysis ID:	17-4064-1329	**Endpoint:**	Mean Dry Biomass-mg	**CETIS Version:**	CETISv1.9.7
Analyzed:	16 Feb-21 14:15	**Analysis:**	Linear Interpolation (ICPIN)	**Status Level:**	1
Edit Date:	16 Feb-21 14:15	**MD5 Hash:**	920D99AB46587FC8FADC1621E3F3E337	**Editor ID:**	006-834-630-9

Linear Interpolation Options

X Transform	Y Transform	Seed	Resamples	Exp 95% CL	Method
Log(X+1)	Linear	1702141	200	Yes	Two-Point Interpolation

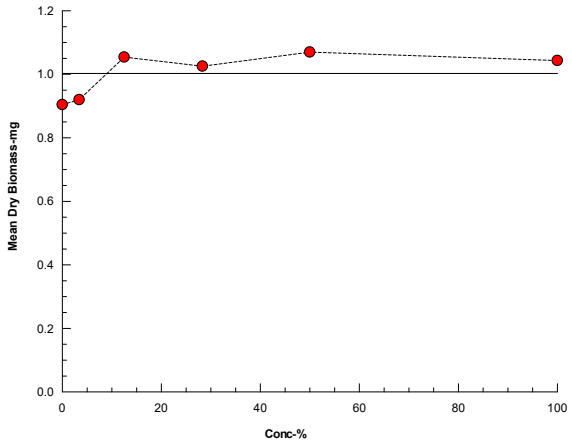
Point Estimates

Level	%	95% LCL	95% UCL	TU	95% LCL	95% UCL
IC25	>100	---	---	<1	---	---

Mean Dry Biomass-mg Summary

			Calculated Variate						Isotonic Variate	
Conc-%	Code	Count	Mean	Median	Min	Max	CV%	%Effect	Mean	%Effect
0	D	4	0.9045	0.8705	0.848	1.029	9.25%	0.00%	1.003	0.00%
3.4		4	0.92	0.8915	0.868	1.029	8.11%	-1.72%	1.003	0.00%
12.5		4	1.054	1.072	0.97	1.103	5.63%	-16.53%	1.003	0.00%
28.3		4	1.026	1.055	0.874	1.119	10.53%	-13.38%	1.003	0.00%
50		4	1.07	1.103	0.885	1.189	12.46%	-18.30%	1.003	0.00%
100		4	1.043	1.015	0.916	1.227	14.25%	-15.34%	1.003	0.00%

Graphics



APPENDIX B

REFERENCE TOXICANT DATA SHEETS

REFERENCE TOXICANT DATA SHEET

Client: QA / QC
Test Organism: *Ceriodaphnia dubia*
Source: In-House culture
ID#: Cd 3777
Age: < 24 hours
Feeding: none
Test Chamber Size: 30 ml
Volume per Replicate: 25 ml

Reference Toxican: NaCl
Stock Solution: 20 g/L in DI (ASTM Type I) water
Reagent Log ID #: 2 B 082-08
Designed Test Temperature: 20 ± 1 °C

Test Begin: Date 1/12/2021 Time 15:45
Test End: Date 1/14/2021 Time 14:45
*Dilution Water (Recon MH) ID# 5249
Dilution Water Hardness (as $CaCO_3$) 77
Dilution Water Alkalinity (as $CaCO_3$) 55

Dand*60
5dth*7

	0 hr	24 hr	48 hr
Technician	BV	BV	BV
Time	1545	1425	48 hr 14:45
Therm. ID #	255	255	255

Toxicant Concentration (g/L)	Test Chamber Number	Number of Live Organisms			Dissolved Oxygen (mg/l)			pH			Temperature (°C)			Conductivity (µS)		
		0	24	48	0	24	48	0	24	48	0	24	48	0	24	48
Control	A	5	5	5	8.2		8.3	8.4		7.9	20.5	19.9	20.1	319		403
	B	5	5	4												
1.0	A	5	5	4	8.3		8.5	8.3		7.8	20.4	19.5	19.6	2340		2210
	B	5	5	4												
1.5	A	5	5	4	8.4		8.6	8.2		7.9	20.4	20.0	19.4	3040		3300
	B	5	5	4												
2.0	A	5	5	2	8.5		8.7	8.2		7.9	20.5	19.7	20.1	4380		4310
	B	5	5	2												
3.0	A	5	5	0	8.5		8.7	8.2		7.9	20.5	20.0	20.0	6320		6170
	B	5	5	0												
4.0	A	5	0	–	8.5	8.1	–	8.2	7.9	–	20.6	20.0	–	8190	8160	–
	B	5	0	–												
Test Acceptability Criteria (TAC) or test condition:		Survival in Controls: ≥ 90% (required TAC)			(@ 20°C): > 4.0 and < 9.1 (recommended)			pH: > 6.0 and < 9.0 (recommended)			Temperature ± 1 °C (recommended)			(QA) none		

Note: If organisms are alive @ 24hrs, no DO, pH, or Cond. measurements to be taken in that test chamber to avoid injuring the organisms

*Dilution Water Code
Recon. - reconstituted water
MH - moderately hard

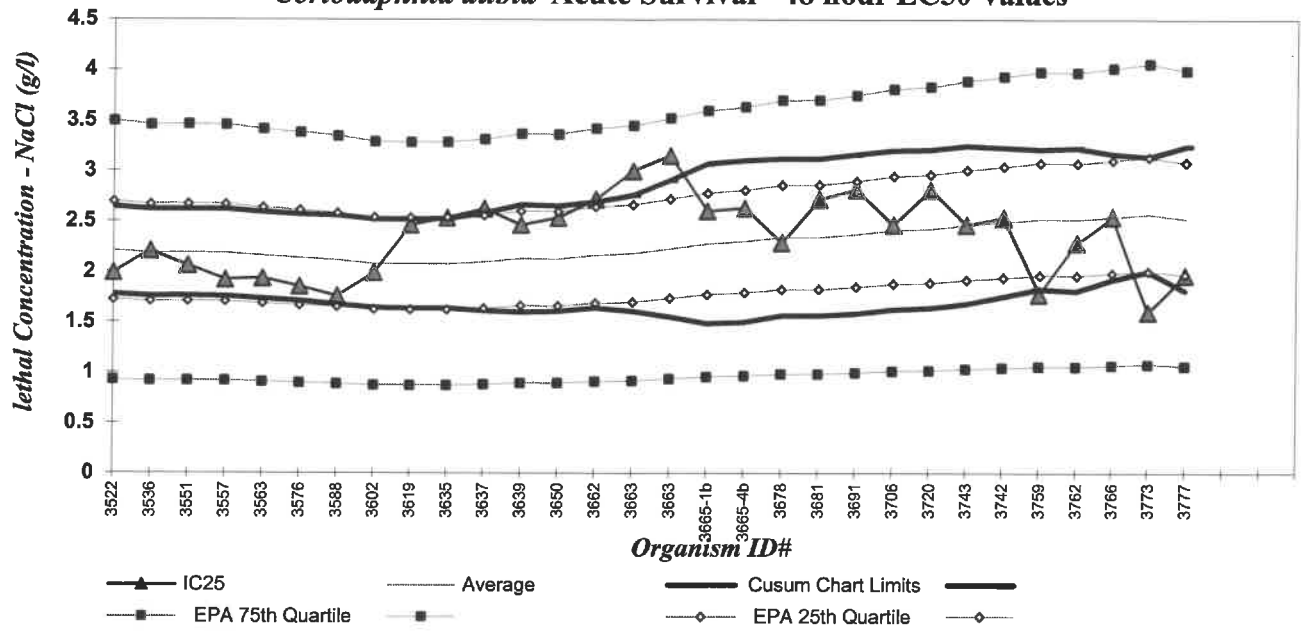
48 Hour LC_{50}: 1.97
Cusum Chart Limits: 1.81 to 3.24
Statistical Method: Prob.t

We verify this data is true and correct.
Task Manager
Project Manager: Alyssa Lampi
QA Officer

REFTOX - Cd acute (ASL 670-0220).xlsm
Doc Control ID: ASL670-0220

REFERENCE TOXICANT CUMLATIVE SUMMARY (CUSUM) CHART

Ceriodaphnia dubia **Acute Survival - 48 hour LC50 Values**



Ceriodaphnia dubia - ACUTE (EPA Test Method 2002.0)

SODIUM CHLORIDE (g/L)

Endpoint: 48 hour Survival

Stats Method: Probit, Spearman-Karber, Linear Interpolation

Test Conditions: Recon MH, 20 oC

From EPA 833-R-00-003:

10th Quartile CV (*control limit*) =	0.06
25th Quartile CV (*warning limit*) =	0.11
75th Quartile CV (warning *limit*) =	0.29
90th Quartile CV (*control limit*) =	0.34

Intralab CV is compared to EPA ***Warning limits*** *(25th and 75th CV's) and* ***Control limits*** *(10th and 90th CV's), If lab CV is outside EPA Control limits, the EPA Control limits are used to set Cusum chart limits.*

Event #	Cerio ID #	Test Start Date	LC50	Running Average	Running SD	Cusum Chart Limits AVG-2SD	Cusum Chart Limits AVG+2SD	Intralab CV
182	3665-1b	03/03/20	**2.60**	2.3	0.40	**1.48**	**3.07**	0.17
183	3665-4b	03/03/20	**2.63**	2.3	0.40	**1.50**	**3.10**	0.17
184	3678	04/03/20	**2.29**	2.3	0.39	**1.56**	**3.12**	0.17
185	3681	04/08/20	**2.72**	2.3	0.39	**1.56**	**3.12**	0.17
185	3691	05/07/20	**2.81**	2.4	0.39	**1.58**	**3.16**	0.16
185	3706	07/07/20	**2.46**	2.4	0.40	**1.62**	**3.20**	0.16
185	3720	08/06/20	**2.81**	2.4	0.39	**1.64**	**3.21**	0.16
185	3743	09/10/20	**2.46**	2.5	0.39	**1.68**	**3.25**	0.15
185	3742	10/06/20	**2.54**	2.5	0.37	**1.75**	**3.23**	0.14
185	3759	11/11/20	**1.78**	2.5	0.35	**1.83**	**3.21**	0.14
185	3762	11/23/20	**2.29**	2.5	0.35	**1.81**	**3.23**	0.12
185	3766	12/08/20	**2.54**	2.5	0.31	**1.92**	**3.17**	0.11
185	3773	01/09/21	**1.60**	2.6	0.28	**2.00**	**3.14**	0.14
185	3777	01/12/21	**1.97**	2.5	0.36	**1.81**	**3.24**	0.15
185								

REFERENCE TOXICANT DATA SHEET

Client: QA / QC
Test Organism: *Pimephales promelas*
Source: Aquatox
ID#: FHM 2141
Age: 9 Days
Feeding: none
Test Chamber Size: 800 ml
Volume per Replicate: 750 ml

Reference Toxican: NaCl
Stock Solution: 20 g/L in DI (ASTM Type I) water
Reagent Log ID #: 2B092-08
Designed Test Temperature: 20 ± 1 °C

Test Begin: Date 1/6/2021 Time 15:30
Test End: Date 1/8/2021 Time 15:37
*Dilution Water (Recon MH) ID# 9248
Dilution Water Hardness (as $CaCO_3$) 78
Dilution Water Alkalinity (as $CaCO_3$) 62

	0 hr	24 hr	48 hr
Technician	TC/BC	TC	BC/TC
Time	1530	1007	1537
Therm. ID #	252	252	~~255~~ 255

Toxicant Concentration (g/L)	Test Chamber Number	Number of Live Organisms			Dissolved Oxygen (mg/l)			pH			Temperature (°C)			Conductivity (µS)		
		0	24	48	0	24	48	0	24	48	0	24	48	0	24	48
Control	A	10	10	10	8.4	8.3	8.4	8.0	8.0	8.1	20.8	20.5	*~~20.3~~ 20.1	340		360
4.0	A	10	10	10	8.6	8.4	8.3	8.1	7.9	7.9	20.8	20.7	*~~20.5~~ 20.1	7660		8010
6.0	A	10	10	10	8.6	8.3	8.2	8.1	7.9	7.9	20.7	20.7	*~~20.4~~ 20.3	11250		11750
8.0	A	10	0	0	8.7	8.4	8.2	8.1	7.9	7.8	20.7	20.5	*~~20.2~~ 20.2	14980 ~~14400~~ 20c TC 1/6/21		14900
10.0	A	10	0	—	8.6	8.3	—	8.0	7.8	—	20.9	20.6	—	19400 ~~21400~~ 20c TC 1/6/21	17310	—
12	A	10	0	—	8.6	8.3	—	8.0	7.8	—	20.8	20.7	—	21400	20500	—
Test Acceptability Criteria (TAC) or test condition:		Survival in Controls: ≥ 90% (required TAC)			(@ 20°C): > 4.0 and < 9.1 (recommended)			pH: > 6.0 and < 9.0 (recommended)			Temperature ± 1 °C (recommended)			(QA) none		

*Dilution Water Code
Recon. - reconstituted water
S - soft
MH - moderately hard
H - hard
Art. Sea - Artificial Sea Water

*BC R06
1/7/2021

48 Hour LC_{50}: 6.9
Cusum Chart Limits: 5.7 to 8.7
Statistical Method: Spearman Karber

We verify this data is true and correct.
Task Manager
Project Manager
QA Officer

Ceriodaphnia dubia
Survival and Reproduction
Test Data Summary

Client: QA / QC Test Start Date: 1-12-21

Sample Description: NaCl Initial Sample ID#: 2B 083-03

Data summarized by: BM

Percent or Concentration	Total Live Young Produced in First 3 Broods per Replicate										# Alive Adults	Total Live Young
	A	B	C	D	E	F	G	H	I	J		
Control	18	13	22	16	18	22	19	13	19	15	10	175
	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?		
0.25 g/L	15	16	17	16	15	18	14	19	15	17	10	162
	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?		
0.50 g/L	12	16	22	21	15	19	12	12	17	17	9	163
	AD?	AD?	AD?	AD?	AD?	AD?	AD? ✓	AD?	AD?	AD?		
1.0 g/L	9	14	16	13	8	14	16	~~19~~ 16 BM 1/21	9	6	10	121
	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?		
1.5 g/L	9	11	4	9	6	9	13	11	13	~~15~~ 9 BM 1/21	10	94
	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?		
2.0 g/L												
	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?	AD?		
4.0 g/L	0	0	0	0	0	0	0	0	0	0	0	0
	AD? ✓	AD? ✓	AD? ✓	AD? ✓	AD? ✓	AD? ✓	AD? ✓	AD? ✓	AD? ✓	AD? ✓		

Test Organism Mortality (Adult dead) = AD? ✓

Test Organism identified as Male = AD? M

Test Organism Injured during test = AD? I

# of Alive Adults = Number of test organism alive at termination

Total Live Young = Total neonates produced in first 3 broods

Footnote: As per EPA-600-4-91-002 and EPA-821-R-02-013, *Ceriodaphnia dubia* test should be terminated when 60% of the surviving control organisms have produced their third brood, or at the end of eight days, whichever occurs first.

Also as per EPA-821-R-02-013 (13.10.9.1), "In this three-brood test, offspring from fourth or higher broods should not be counted and should not be included in the total number of neonates produced during the test."

Endpoint	Value	Cusum Chart Limits
Survival - EC_{25}	2.38	0.44 to 2.48
Reproduction - IC_{25}	0.86	0.05 to 1.38

Task Manager: BM 1/23/21

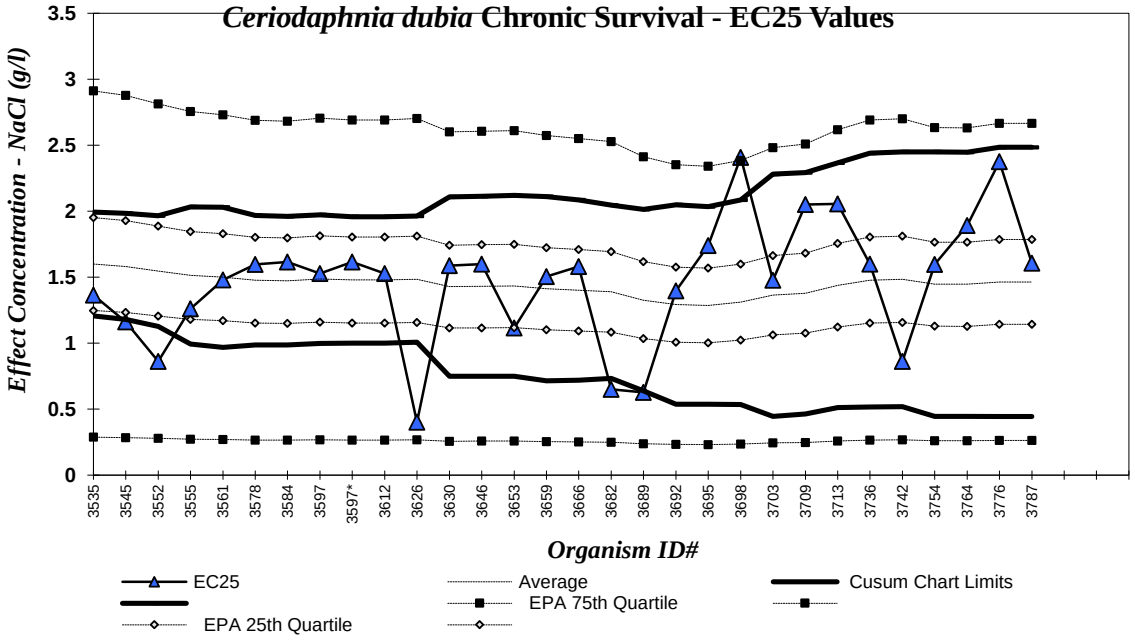
Project Manager:

QA Officer: MB

The survival endpoint is from Day 6 data that includes all concentrations, Reproduction is day 7 data with the 2.0 g/L concentration removed due to confounded data. MB1/23/21

REFERENCE TOXICANT CUMLATIVE SUMMARY (CUSUM) CHART

***Ceriodaphnia dubia* Chronic Survival - EC25 Values**



Ceriodaphnia dubia - Chronic (EPA Test Method 1002.0)

SODIUM CHLORIDE (g/L)

Endpoint: Chronic Survival

Stats Method: Linear Interpolation

Test Conditions: Recon MH, 25 oC

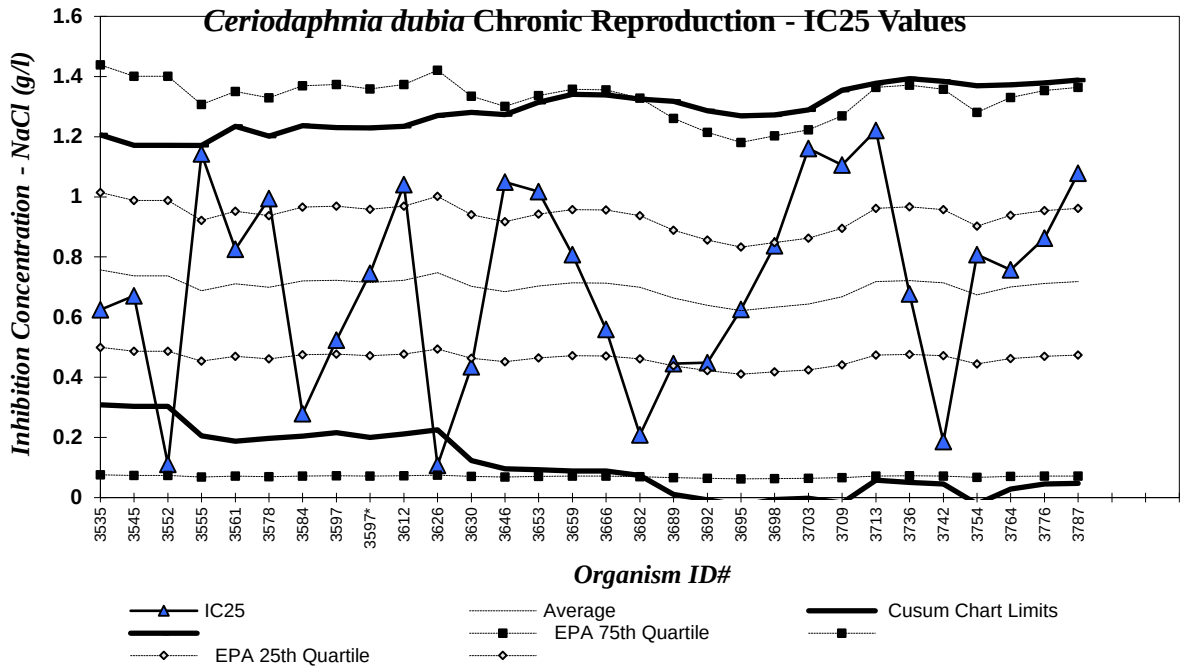
From EPA 833-R-00-003:

10th Quartile CV (*control limit*) =	0.07
25th Quartile CV (*warning limit*) =	0.11
75th Quartile CV (warning *limit*) =	0.41
90th Quartile CV (*control limit*) =	0.81

Intralab CV is compared to EPA ***Warning limits*** *(25th and 75th CV's) and* ***Control limits*** *(10th and 90th CV's), If lab CV is outside EPA Control limits, the EPA Control limits are used to set Cusum chart limits.*

Event #	Cerio ID #	Test Start Date	EC25	Running Average	Running SD	Cusum Chart Limits AVG-2SD	Cusum Chart Limits AVG+2SD	Intralab CV
350	3653	01/28/20	1.11	1.43	0.34	**0.75**	**2.12**	0.25
351	3659	02/11/20	1.50	1.41	0.35	**0.72**	**2.11**	0.24
352	3666	03/03/20	1.58	1.40	0.34	**0.72**	**2.08**	0.24
353	3682	04/14/20	**0.65**	1.39	0.33	**0.73**	**2.05**	0.26
354	3689	04/28/20	**0.63**	1.33	0.34	**0.64**	**2.01**	0.29
355	3692	05/12/20	1.40	1.29	0.38	**0.54**	**2.05**	0.29
356	3695	05/19/20	1.74	1.29	0.37	**0.54**	**2.03**	0.30
357	3698	06/02/20	**2.41**	1.31	0.39	**0.54**	**2.09**	0.34
358	3703	06/23/20	1.48	1.36	0.46	**0.45**	**2.28**	0.33
359	3709	07/14/20	2.05	1.38	0.46	**0.46**	**2.29**	0.32
360	3713	07/28/20	2.06	1.44	0.46	**0.51**	**2.37**	0.33
361	3736	09/15/20	1.60	1.48	0.48	**0.52**	**2.44**	0.32
362	3742	10/06/20	0.86	1.48	0.48	**0.52**	**2.45**	0.35
363	3754	11/03/20	1.60	1.45	0.50	**0.45**	**2.45**	0.35
364	3764	12/01/20	1.89	1.45	0.50	**0.45**	**2.45**	0.35
365	3776	01/12/21	2.38	1.46	0.51	**0.44**	**2.48**	0.37
366	3787	02/02/21	1.61	1.46	0.51	**0.44**	**2.48**	0.36

REFERENCE TOXICANT CUMLATIVE SUMMARY (CUSUM) CHART



Ceriodaphnia dubia - Chronic (EPA Test Method 1002.0)

SODIUM CHLORIDE (g/L)

Endpoint: Chronic Reproduction

Stats Method: Linear Interpolation

Test Conditions: Recon MH, 25 oC

From EPA 833-R-00-003:

10th Quartile CV (*control limit*) =	0.08
25th Quartile CV (*warning limit*) =	0.17
75th Quartile CV (warning *limit*) =	0.45
90th Quartile CV (*control limit*) =	0.62

Intralab CV is compared to EPA ***Warning limits*** *(25th and 75th CV's) and* ***Control limits*** *(10th and 90th CV's), If lab CV is outside EPA Control limits, the EPA Control limits are used to set Cusum chart limits.*

Event #	Cerio ID #	Test Start Date	IC25	Running Average	Running SD	Cusum Chart Limits AVG-2SD	Cusum Chart Limits AVG+2SD	Intralab CV
353	3682	4/14/2020	0.21	0.70	0.31	**0.07**	**1.32**	0.49
354	3689	4/28/2020	0.45	0.66	0.33	**0.01**	**1.32**	0.51
355	3692	5/12/2020	0.45	0.64	0.32	**-0.01**	**1.29**	0.52
356	3695	5/19/2020	0.63	0.62	0.32	**-0.03**	**1.27**	0.50
357	3698	6/2/2020	0.84	0.63	0.32	**-0.01**	**1.27**	0.50
358	3703	6/23/2020	1.16	0.64	0.32	**0.00**	**1.29**	0.51
359	3709	7/14/2020	1.11	0.67	0.34	**-0.02**	**1.35**	0.46
360	3713	7/28/2020	1.22	0.72	0.33	**0.06**	**1.38**	0.46
361	3736	9/15/2020	0.68	0.72	0.34	**0.05**	**1.39**	0.47
362	3742	10/6/2020	0.19	0.71	0.33	**0.04**	**1.38**	0.52
363	3754	11/3/2020	0.81	0.67	0.35	**-0.02**	**1.37**	0.48
364	3764	12/1/2020	0.76	0.70	0.34	**0.03**	**1.37**	0.47
365	3776	1/12/2021	0.86	0.71	0.33	**0.05**	**1.38**	0.47
366	3787	2/2/2021	1.08	0.72	0.34	**0.05**	**1.39**	0.47

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

FATHEAD MINNOW 7-DAY SURVIVAL AND WATER QUALITY DATA

Random Template Used: 6 conc. x 4 reps. # 1
Stock Sol. ID 2B 0858 - 01
Organism ID: FHM 7143
Waterbath/incubator Used: # 4
Date Initiated 1/12/21 Time 16:53
Date Terminated 1/19/21 Time 09:15
Test Container Size: 800 ml
Solution Volume / rep: 500 ml
Client QA / QC - RefTox
Sample Description KCl (50 g/L stock)

Tech: Day 0 BC Day 1 BC Day 2 BC Day 3 TC/BC Day 4 TC Day 5 BC Day 6 TC Day 7 BE
Time: Day 0 1653 Day 1 1415 Day 2 1320 Day 3 1135 Day 4 1248 Day 5 1205 Day 6 1334 Day 7 0915

Conc. or Percent	Day	Number of Live Organisms A	B	C	D	Dissolved O_2 (mg/l) Pre	Post	pH Pre	Post	Temp. (°C) Pre	Therm. ID #	Conductivity (µS) Post (daily)
Control	0	10	10	10	10		7.7		7.2	Post: 24.8	251	307
	1	10	10	10	10	6.7	8.0	7.6	8.3	24.4	251	334
	2	10	10	10	10	7.5	8.3	7.5	8.0	(23.6)	251	340
	3	10	10	10	10	6.9	8.1	7.6	8.2	(23.8)	251	311
	4	10	10	10	10	6.7	7.9	7.5	7.9	24.1	251	311
	5	10	10	10✓	10	6.6	7.6	6.8	7.4	(23.8)	251	318
	6	10	10	10✓	10	6.7	8.3	7.6	8.1	(23.6)	251	330
	7	10	10	10	10	6.1		7.2		*	251	
0.25 g/L	0	10	10	10	10		7.9		7.2	Post: 25.0		773
	1	10	10	10	10	6.7	8.1	7.5	8.3	24.5		805
	2	10	10	10	10	7.5	8.4	7.5	8.0	(23.6)		805
	3	10	10	10	10	6.6	8.3	7.6	8.2	(23.9)		769
	4	10	10	10	10✓	6.4	8.1	7.4	7.9	24.1		774
	5	10✓	10✓	10	10✓	6.6	8.2	6.9	7.9	(23.9)		764
	6	10	10✓✓	10✓	10	6.3	8.4	7.6	8.1	(23.6)		813
	7	10	10	10	10	6.4		7.3		23.1		
0.50 g/L	0	BC ROC missed 10	10	10 BC ROC missed 10			7.9		7.8	Post: 25.0		1239
	1	10	10	10	10	6.8	8.2	7.6	8.3	24.4		1270
	2	10	10	10	10	7.4	8.5	7.6	8.1	(23.6)		1279
	3	9m	10	10	10	6.9	8.4	7.6	8.3	(23.8)		1260
	4	9	10	10	10	6.4	8.0	7.4	8.0	24.1		1246
	5	9	10	10	9	6.2	8.3	7.1	8.0	(23.9)		1274
	6	9	10	10✓	10✓	7.1	8.1	7.6	8.1	(23.6)		1339
	7	9	10	10	9m	6.7		7.4		23.2		
1.0 g/L	0	10	10	10	10		8.0		8.0	Post: 25.0		2140
	1	5	5	3	6	6.9	Missed BC IN 7.6		8.4	24.6		2150
	2	5	5	3	6	7.4	8.5	7.8	8.2	(23.8)		2170
	3	5	5	3	5	6.9	8.5	7.6	8.3	(23.8)		2130
	4	5	5	3	5	6.3	8.1	7.3	8.0	24.1		2190
	5	4	5	3	2	6.4	8.3	7.7	8.0	(23.8)		2150
	6	4	3✓	3	1	7.0	8.5	7.6	8.1	(23.6)		2250
	7	3	2	2	1	7.1		7.7		23.3		
2.0 g/L	0	10	10	10	10		8.0		8.0	Post: 25.0		3870
	1	0	0	0	0	6.9		7.6		24.6		
	2											
	3											
	4											
	5											
	6											
	7											
4.0 g/L	0	10	10	10	10		7.9		8.0	Post: 25.0		7360
	1	0	0	0	0	7.0	8.2	7.6		24.4		
	2											
	3											
	4											
	5											
	6											
	7											

✓ Indicates one organism inadvertently poured off during solution renewal, replaced into container.
"M" = organism missing, start count reduced. "Inj" = organism injured, remove from stats.
"F" = fungus noted on dead organisms.
Pre =Pre-renewal solutions. Post =Post-renewal solutions.
Day 0 Temperatures = Post-renewals
Therm ID# = Thermometer ID used for all measurements that day.
(23.8) = Temp. out of recommended range

Endpoint

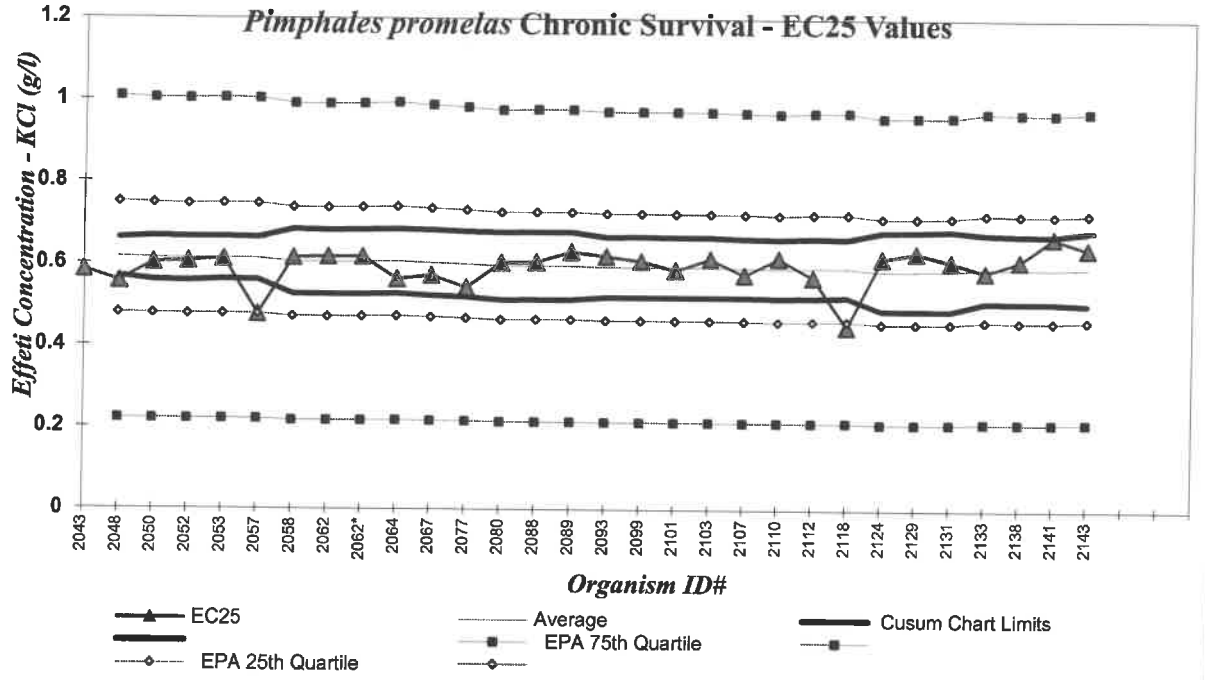
Survival - EC_{25} * BC ROC missed temp 0.64
Growth - IC_{25} 0.62

Cusum Chart Limits

0.51 to 0.68
0.44 to 0.72

Task Manager Alyssa Lamp
Project Manager
QA Officer

REFERENCE TOXICANT CUMLATIVE SUMMARY (CUSUM) CHART



Pimephales promelas **- Chronic (EPA Test Method 1000.0)**

POTASSIUM CHLORIDE (g/L)

Endpoint: Chronic Survival

Stats Method: Linear Interpolation

Test Conditions: Recon MH, 25 oC

From EPA 833-R-00-003:

10th Quartile CV (*control limit*) = 0.03

25th Quartile CV (*warning limit*) = 0.11

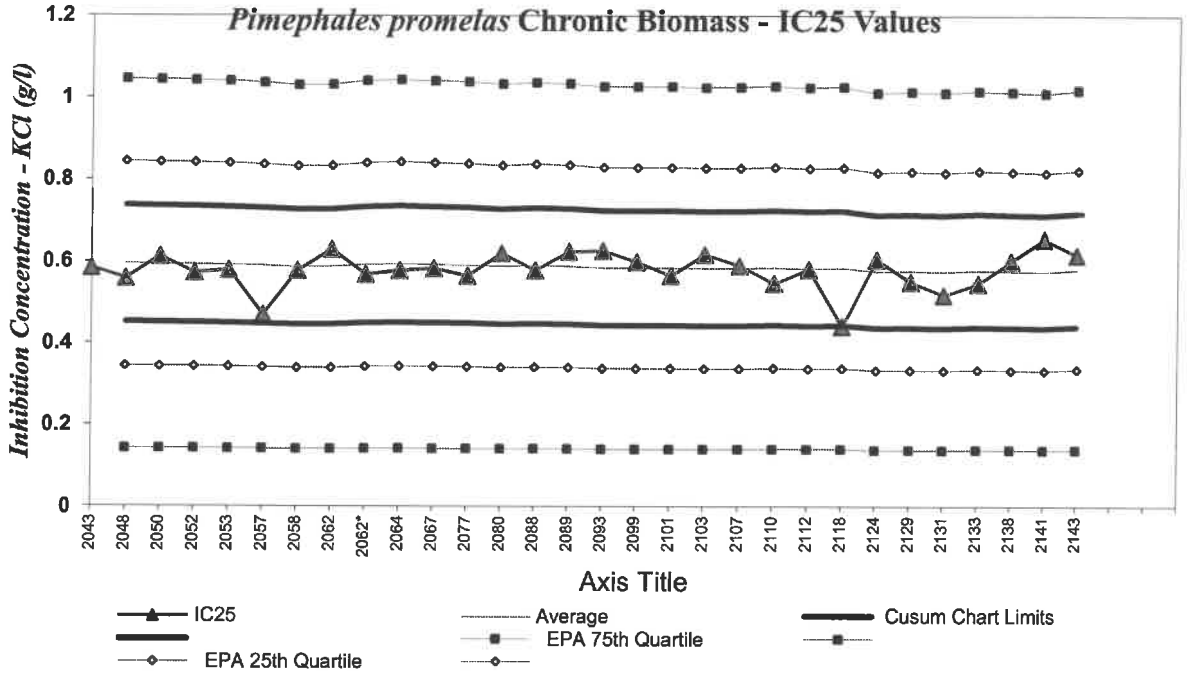
75th Quartile CV (*warning limit*) = 0.32

90th Quartile CV (*control limit*) = 0.52

Intralab CV is compared to EPA ***Warning limits*** *(25th and 75th CV's) and* ***Control limits*** *(10th and 90th CV's), If lab CV is outside EPA Control limits, the EPA Control limits are used to set Cusum chart limits.*

Event #	FHM ID #	Test Start Date	EC25	Running Average	Running SD	Cusum Chart Limits AVG-2SD	Cusum Chart Limits AVG+2SD	Intralab CV
54	2099	4/7/2020	**0.61**	0.6	0.04	**0.52**	**0.67**	0.06
55	2101	4/21/2020	**0.59**	0.6	0.04	**0.52**	**0.67**	0.06
56	2103	5/5/2020	**0.62**	0.6	0.04	**0.52**	**0.67**	0.06
57	2107	6/2/2020	**0.58**	0.6	0.04	**0.52**	**0.66**	0.06
58	2110	6/16/2020	**0.62**	0.6	0.04	**0.52**	**0.66**	0.06
59	2112	7/14/2020	**0.57**	0.6	0.04	**0.52**	**0.66**	0.06
60	2118	8/11/2020	**0.45**	0.6	0.04	**0.52**	**0.66**	0.08
61	2124	9/3/2020	**0.62**	0.6	0.05	**0.49**	**0.68**	0.08
62	2129	10/6/2020	**0.63**	0.6	0.05	**0.49**	**0.68**	0.08
63	2131	10/20/2020	**0.61**	0.6	0.05	**0.49**	**0.68**	0.07
64	2133	10/27/2020	**0.58**	0.6	0.04	**0.51**	**0.68**	0.07
65	2138	12/3/2020	**0.61**	0.6	0.04	**0.51**	**0.67**	0.07
66	2141	12/29/2020	**0.67**	0.6	0.04	**0.51**	**0.67**	0.07
67	2143	1/12/2021	**0.64**	0.6	0.04	**0.51**	**0.68**	0.08
68								
69								

REFERENCE TOXICANT CUMLATIVE SUMMARY (CUSUM) CHART



Pimephales promelas - Chronic (EPA Test Method 1000.0)

POTASSIUM CHLORIDE (g/L)

Endpoint: Chronic Growth (Biomass)

Stats Method: Linear Interpolation

Test Conditions: Recon MH, 25 oC

From EPA 833-R-00-003:

10th Quartile CV (*control limit*) =	0.12
25th Quartile CV (*warning limit*) =	0.21
75th Quartile CV (*warning limit*) =	0.38
90th Quartile CV (*control limit*) =	0.45

Intralab CV is compared to EPA ***Warning limits*** *(25th and 75th CV's) and* ***Control limits*** *(10th and 90th CV's), If lab CV is outside EPA Control limits, the EPA Control limits are used to set Cusum chart limits.*

Event #	FHM ID #	Test Start Date	IC25	Running Average	Running SD	Cusum Chart Limits AVG-2SD	Cusum Chart Limits AVG+2SD	Intralab CV
54	2099	4/7/2020	**0.60**	0.58	0.04	**0.44**	**0.72**	0.06
55	2101	4/21/2020	**0.57**	0.58	0.04	**0.44**	**0.72**	0.06
56	2103	5/5/2020	**0.62**	0.58	0.04	**0.44**	**0.72**	0.06
57	2107	6/2/2020	**0.59**	0.58	0.04	**0.44**	**0.72**	0.06
58	2110	6/16/2020	**0.55**	0.58	0.04	**0.44**	**0.72**	0.06
59	2112	7/14/2020	**0.58**	0.58	0.04	**0.44**	**0.72**	0.06
60	2118	8/11/2020	**0.441**	0.58	0.04	**0.443**	**0.72**	0.08
61	2124	9/3/2020	**0.60**	0.57	0.05	**0.44**	**0.71**	0.08
62	2129	10/6/2020	**0.55**	0.58	0.05	**0.44**	**0.71**	0.08
63	2131	10/20/2020	**0.52**	0.57	0.05	**0.44**	**0.71**	0.08
64	2133	10/27/2020	**0.54**	0.58	0.04	**0.44**	**0.72**	0.08
65	2138	12/3/2020	**0.60**	0.58	0.04	**0.44**	**0.71**	0.07
66	2141	12/29/2020	**0.65**	0.57	0.04	**0.44**	**0.71**	0.08
67	2143	1/12/2021	**0.62**	0.58	0.05	**0.44**	**0.72**	0.08
68								
69								

APPENDIX C

CHAIN OF CUSTODY

eurofins | Environment Testing TestAmerica

Sample Receipt Record

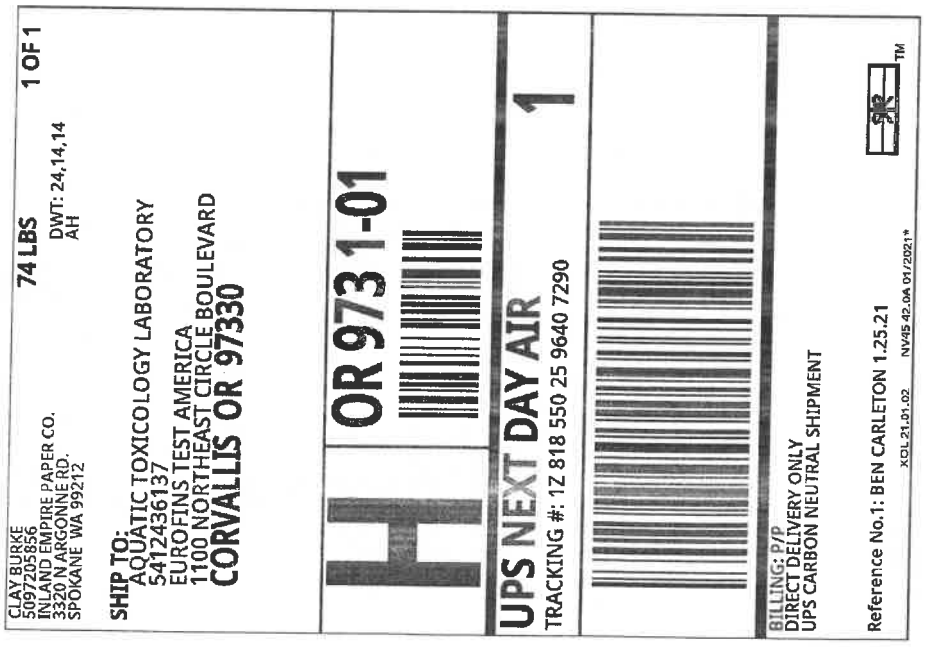
Batch Number: BYG2601-01 Date Received: 1/26/21

Client/Project: Inland Empire Paper Received By: [illegible]

Were custody seals intact?	☒ Yes	☐ No	☐ N/A
Packing Material:	☒ Ice	☐ Blue Ice	☐ Box
Temp OK? (≤ 6°C) Therm ID: TH173 Expires: 3/9/2021 Observed: 0.1 / 0.2 °C, Actual Temp: 1.1 / 1.2 °C	☒ Yes	☐ No	☐ N/A
If sample is noted @ ≤ 0.0 °C, is the sample frozen or partially frozen?	☐ Yes	☐ No	☒ N/A
Was a Chain of Custody (CoC) Provided?	☒ Yes	☐ No	☐ N/A
Was the CoC correctly filled out? (If No, document below)	☒ Yes	☐ No	☐ N/A
Were the sample containers in good condition (not broken or leaking)?	☒ Yes	☐ No	☐ N/A
Are all samples within 36 hours of collection?	☒ Yes	☐ No	☐ N/A

Method of Shipment: ☐ Hand Delivered, ☐ FedEx, ☒ UPS, ☐ Greyhound, ☐ Other: _____ ☐ N/A

Sample Exception Report (The following exceptions were noted)



CHAIN OF CUSTODY RECORD - FOR AQUATIC TOXICITY TESTING

eurofins | Environment Testing TestAmerica

Client: Inland Empire Paper Co. NPDES# WA-000082-5

Address: 3320 N. Argonne Rd
Millwood, WA
99212

Contact Person: Ben Carleton

Phone: (509) 924-1911

PO# 106663

Composite Sample Information

Samples/Hour 60 Volume/Sample 30mL

Total Hours 24 Total Volume 11.5 gal

Initiated: Date 1/24/21 Time 7:00AM

Ended: Date 1/25/21 Time 7:00AM

Chilled During Collection Yes

Ship Samples to:

Eurofins TestAmerica
Attention: Aquatic Toxicology Laboratory
1100 NE Circle Blvd. Suite 310
Corvallis, OR 97330
Phone: 541-243-6137

Analysis Required / Comments

Sample ID	Date	Time	Sample Type: Comp.	Sample Type: Grab	# of Containers	Lab ID#	Fathead Acute	Fathead Chronic	Cerio Acute	Cerio Chronic	Daphnia Acute	Trout Acute	SHM Acute	SHM Chronic	MB Acute	MB Chronic	MYS Acute	MYS Chronic	Algae	CA Haz Waste	WA Haz Waste			Concentration and/or Comments
IEP_Comp	1/25/21	7:00am	X		2	B493601	X	X	X	X														

Sampled By & Title (Please sign and print name) BRIAN VUONG - Lab Tech	Date/Time 1-25-21 7:15	Relinquished By (Please sign and print name) BRIAN VUONG	Date/Time 1/25/21 7:15
Received By (Please sign and print name) Alyssa Lamp	Date/Time 1/26/21 1030	Relinquished By (Please sign and print name)	Date/Time
Received By (Please sign and print name)	Date/Time	Relinquished By (Please sign and print name)	Date/Time
Received By (Please sign and print name)	Date/Time	Shipped Via UPS V Bus Fed-Ex Hand Other	Shipping # COC_Bioassay.xls
Work Authorized By (Please sign and print name)	Remarks		Doc Control ID: ASL612-0519

eurofins | Environment Testing TestAmerica

Sample Receipt Record

Batch Number: B 4926-02
Client/Project: Inland Empire

Date Received: 1/28/21
Received By: BC

Were custody seals intact?	☒ Yes	☐ No	☐ N/A			
Packing Material:	☒ Ice	☐ Blue Ice	☐ Box			
Temp OK? (≤ 6°C) Therm ID: 173 Expires: 03 09/20 21 Observed: 5 °C, Actual Temp: .7 .3 °C	☒ Yes	☐ No	☐ N/A			
If sample is noted @ ≤ 0.0 °C, is the sample frozen or partially frozen?	☐ Yes	☐ No	☒ N/A			
Was a Chain of Custody (CoC) Provided?	☒ Yes	☐ No	☐ N/A			
Was the CoC correctly filled out? (If No, document below)	☒ Yes	☐ No	☐ N/A			
Were the sample containers in good condition (not broken or leaking)?	☒ Yes	☐ No	☐ N/A			
Are all samples within 36 hours of collection?	☒ Yes	☐ No	☐ N/A			
Method of Shipment: ☐ Hand Delivered, ☐ FedEx, ☒ UPS, ☐ Greyhound, ☐ Other: _____			☐ N/A			

Sample Exception Report (The following exceptions were noted)

Client was notified on: Client contact:

Resolution to Exception:

CHAIN OF CUSTODY RECORD - FOR AQUATIC TOXICITY TESTING

eurofins | Environment Testing TestAmerica

Client: Inland Empire Paper Co. NPDES# WA-000082-5

Address: 3320 N. Argonne Rd.
Millwood, WA
99212

Contact Person: Ben Carleton
Phone: (509) 924-1911

PO# 106663

Composite Sample Information
Samples/Hour 60 Volume/Sample 30 mL
Total Hours 24 Total Volume 11.5 gal
Initiated: Date 1/26/21 Time 7:00AM
Ended: Date 1/27/21 Time 7:00AM
Chilled During Collection Yes

Ship Samples to:
Eurofins TestAmerica
Attention: Aquatic Toxicology Laboratory
1100 NE Circle Blvd. Suite 310
Corvallis, OR 97330
Phone: 541-243-6137

Analysis Required / Comments

Sample ID	Date	Time	Sample Type: Comp.	Sample Type: Grab	# of Containers	Lab ID#	Fathead Acute	Fathead Chronic	Cerio Acute	Cerio Chronic	Daphnia Acute	Trout Acute	SHM Acute	SHM Chronic	MB Acute	MB Chronic	MYS Acute	MYS Chronic	Algae	CA Haz Waste	WA Haz Waste			Concentration and/or Comments
IEP_Comp2	1/27/21	7:00AM	X		2	B4926-02	X	X	X	X														Part 2/3

Sampled By & Title (Please sign and print name) BRIAN VUONG - Lab Tech	Date/Time 1-27-21	Relinquished By (Please sign and print name) BRIAN VUONG	Date/Time 1-27-21 7:15A
Received By (Please sign and print name) Brett Cocuden	Date/Time 1/28/21 0841	Relinquished By (Please sign and print name)	Date/Time
Received By (Please sign and print name)	Date/Time	Relinquished By (Please sign and print name)	Date/Time
Received By (Please sign and print name)	Date/Time	Shipped Via UPS X Bus Fed-Ex Hand Other	Shipping # COC_Bioassay.xls
Work Authorized By (Please sign and print name)	Remarks		Doc Control ID: ASL612-0519

View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialogue box that appears. Note: If your browser does not support this function, select Print from the File menu to print the label.

2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. **GETTING YOUR SHIPMENT TO UPS**
   Customers with a scheduled Pickup
   - Your driver will pickup your shipment(s) as usual.

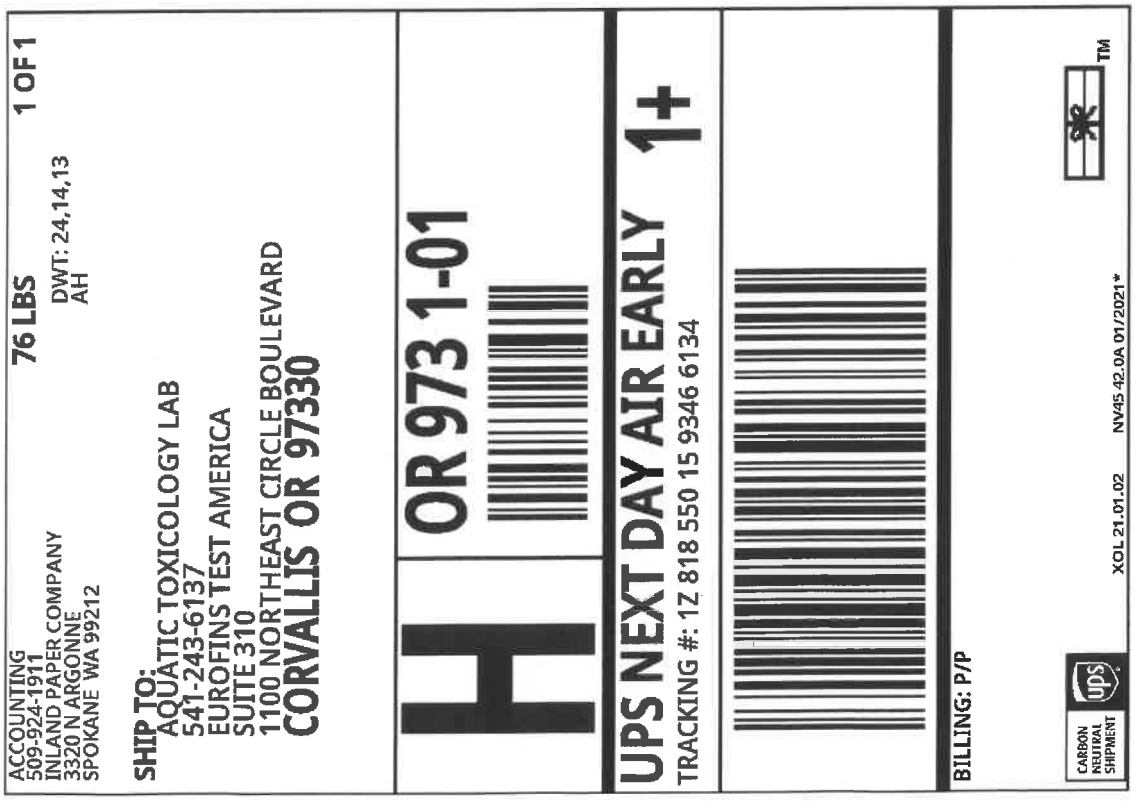
   Customers without a scheduled Pickup
   - Schedule a Pickup on ups.com to have a UPS driver pickup all of your packages.
   - Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. To find the location nearest you, please visit the 'Locations' Quick link at ups.com.

UPS Access Point™
THE UPS STORE
1521 N ARGONNE RD
SPOKANE VALLEY WA 99212-2545

UPS Access Point™
ADVANCE AUTO PARTS STORE 4574
110 S PINES RD
SPOKANE VALLEY WA 99206-5316

UPS Access Point™
ADVANCE AUTO PARTS STORE 4575
4630 E SPRAGUE AVE
SPOKANE VALLEY WA 99212-5014

FOLD HERE



eurofins | Environment Testing TestAmerica

Sample Receipt Record

Batch Number: B49216-03

Client/Project: Inland Empire

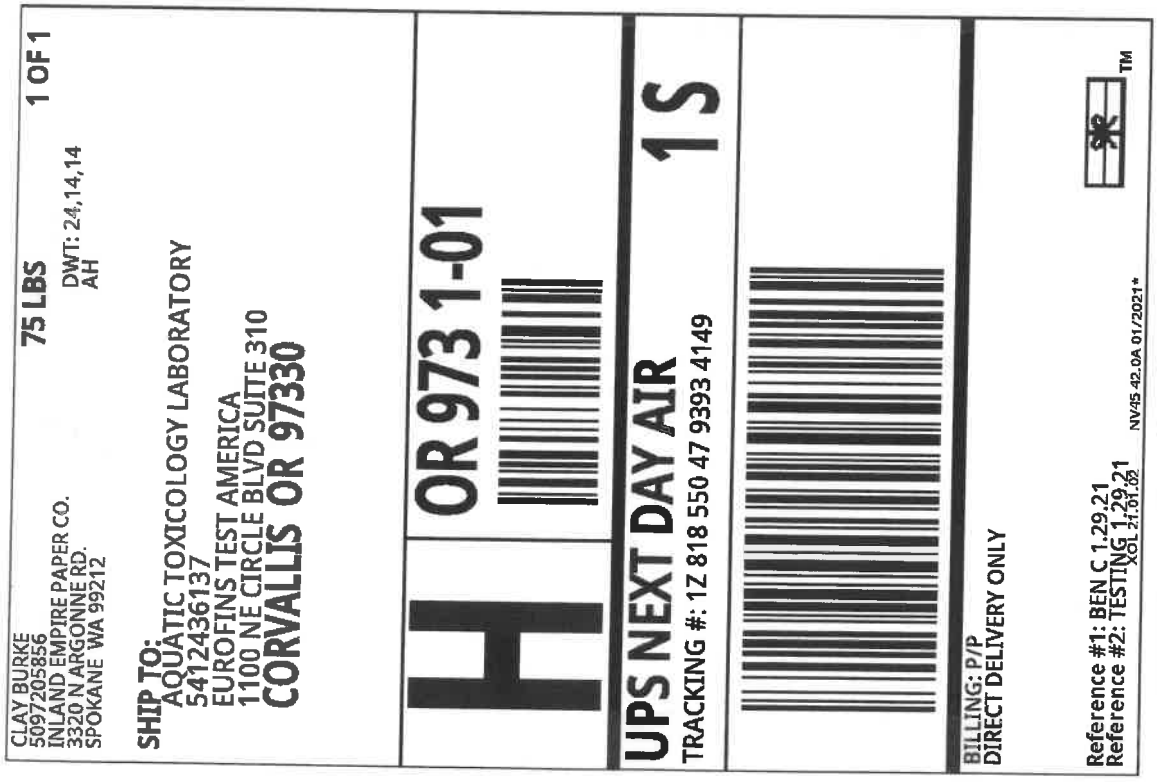
Date Received: 1/30/21

Received By: [illegible]

Were custody seals intact?	☒ Yes	☐ No	☐ N/A	
Packing Material:	☒ Ice	☐ Blue Ice	☐ Box	
Temp OK? (≤ 6°C) Therm ID: TH173 Expires: 3/9/2021 Observed: 0.6 / 0.5 °C, Actual Temp: 1.0 / 0.9 °C	☒ Yes	☐ No	☐ N/A	
If sample is noted @ ≤ 0.0 °C, is the sample frozen or partially frozen?	☐ Yes	☐ No	☒ N/A	
Was a Chain of Custody (CoC) Provided?	☒ Yes	☐ No	☐ N/A	
Was the CoC correctly filled out? (If No, document below)	☒ Yes	☐ No	☐ N/A	
Were the sample containers in good condition (not broken or leaking)?	☒ Yes	☐ No	☐ N/A	
Are all samples within 36 hours of collection?	☒ Yes	☐ No	☐ N/A	

Method of Shipment: ☐ Hand Delivered, ☐ FedEx, ☒ UPS, ☐ Greyhound, ☐ Other: _____ ☐ N/A

Sample Exception Report (The following exceptions were noted)



CHAIN OF CUSTODY RECORD - FOR AQUATIC TOXICITY TESTING

eurofins | Environment Testing TestAmerica

Client: Inland Empire paper Co NPDES# WA 0000 82-5

Address: 3320 N Argonne Rd

Millwood, WA 99212

Contact Person: BEN CARLETON

Phone: (509) 924-1911

PO# _____

Composite Sample Information

Samples/Hour 60 Volume/Sample 30 ml

Total Hours 24 Total Volume 11.5 gal

Initiated: Date 1/28/21 Time 7:00 Am

Ended: Date 1/29/21 Time 7:00 Am

Chilled During Collection _____

Ship Samples to:

Eurofins TestAmerica
Attention: Aquatic Toxicology Laboratory
1100 NE Circle Blvd. Suite 310
Corvallis, OR 97330
Phone: 541-243-6137

Analysis Required / Comments

Sample ID	Date	Time	Sample Type: Comp.	Sample Type: Grab	# of Containers	Lab ID#	Fathead Acute	Fathead Chronic	Cerio Acute	Cerio Chronic	Daphnia Acute	Trout Acute	SHM Acute	SHM Chronic	MB Acute	MB Chronic	MYS Acute	MYS Chronic	Algae	CA Haz Waste	WA Haz Waste			Concentration and/or Comments
IEP. comp	1/29/21	7:Am	X		2	B1926103	X	X	X	X														

Sampled By & Title (Please sign and print name) BRIAN VUONG - Lab Tech	Date/Time 1/29/21 7Am	Relinquished By (Please sign and print name) BRIAN VUONG	Date/Time 1/29/21 7:15
Received By (Please sign and print name) Alyssa Lampa	Date/Time 1/30/21 0935	Relinquished By (Please sign and print name)	Date/Time
Received By (Please sign and print name)	Date/Time	Relinquished By (Please sign and print name)	Date/Time
Received By (Please sign and print name)	Date/Time	Shipped Via UPS X Bus ___ Fed-Ex ___ Hand ___ Other ___	Shipping # COC_Bioassay.xlsx
Work Authorized By (Please sign and print name)	Remarks		Doc Control ID: ASL612-0519

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Client:	Inland Empire Paper	Work Order:	WBA0332
Address:	3320 N. Argonne Rd.	Project:	NPDES Form 2C
	Spokane, WA 99212	Reported:	2/2/2021 09:15
Attn:	Ben Carleton		

Analytical Results Report

Sample Location:	IEP Comp.		
Lab/Sample Number:	WBA0332-01	Collect Date:	01/11/21 07:15
Date Received:	01/12/21 12:30	Collected By:	Ben Carleton
Matrix:	Water		

Analyte	Result	Units	PQL	Analyzed	Analyst	Method	Qualifier
Inorganics							
Phenolics	ND	mg/L	0.0500	1/22/21 14:40	BKP	EPA 420.1	
Cyanide	0.612	mg/L	0.0100	1/20/21 13:39	SAG	EPA 335.4	
Metals by ICP-MS							
Silver	<0.00003	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Aluminum	0.0770	mg/L	0.0100	1/20/21 13:57	TRC	EPA 200.8	
Arsenic	0.00297	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Boron	0.0340	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Barium	0.0749	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Beryllium	<0.00005	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Cadmium	ND	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Cobalt	ND	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Chromium	ND	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Copper	0.00434	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Iron	0.0726	mg/L	0.0100	1/20/21 13:57	TRC	EPA 200.8	
Magnesium	7.34	mg/L	0.100	1/21/21 13:16	TRC	EPA 200.8	
Manganese	0.693	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Molybdenum	0.00225	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Nickel	0.00205	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Lead	ND	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Antimony	0.00265	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Selenium	ND	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Tin	<0.00004	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Titanium	ND	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Thallium	<0.00005	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Zinc	0.0868	mg/L	0.00100	1/20/21 13:57	TRC	EPA 200.8	
Semivolatiles							
4,4'-DDD	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
4,4'-DDE	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
4,4'-DDT	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Aldrin	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
alpha-BHC	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Arochlor 1016 (1)	ND	ug/L	0.200	1/19/21 0:25	GPB	EPA 608.3	
Arochlor 1221 (1)	ND	ug/L	0.200	1/19/21 0:25	GPB	EPA 608.3	
Arochlor 1232 (1)	ND	ug/L	0.200	1/19/21 0:25	GPB	EPA 608.3	
Arochlor 1242 (1)	ND	ug/L	0.200	1/19/21 0:25	GPB	EPA 608.3	
Arochlor 1248 (1)	ND	ug/L	0.200	1/19/21 0:25	GPB	EPA 608.3	
Arochlor 1254 (1)	ND	ug/L	0.200	1/19/21 0:25	GPB	EPA 608.3	

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Analytical Results Report

(Continued)

Sample Location: IEP Comp.
Lab/Sample Number: WBA0332-01 Collect Date: 01/11/21 07:15
Date Received: 01/12/21 12:30 Collected By: Ben Carleton
Matrix: Water

Analyte	Result	Units	PQL	Analyzed	Analyst	Method	Qualifier
Semivolatiles (Continued)							
Arochlor 1260 (1)	ND	ug/L	0.200	1/19/21 0:25	GPB	EPA 608.3	
beta-BHC	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Chlordane (Total)	ND	ug/L	0.100	1/19/21 0:25	GPB	EPA 608.3	
delta-BHC	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Dieldrin	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Endosulfan I	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Endosulfan II	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Endosulfan sulfate	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Endrin	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Endrin aldehyde	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Endrin ketone	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Heptachlor	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Heptachlor epoxide	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Lindane (BHC-gamma)	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Methoxychlor	ND	ug/L	0.0100	1/19/21 0:25	GPB	EPA 608.3	
Toxaphene	ND	ug/L	0.100	1/19/21 0:25	GPB	EPA 608.3	
Surrogate: DCB	*90.4%*		*40-130*	*1/19/21 0:25*	*GPB*	*EPA 608.3*	
1,2,4-Trichlorobenzene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
1,2-Dichlorobenzene (ortho-Dichlorobenzene)	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
1,2-Dinitrobenzene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
1,2-Diphenyl hydrazine	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
1,3-Dinitrobenzene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
1,4-Dichlorobenzene (para-Dichlorobenzene)	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
1,4-Dinitrobenzene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
1-Methylnaphthalene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2,3,4,6-Tetrachlorophenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2,3,5,6-Tetrachlorophenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2,4,5-Trichlorophenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2,4,6-Trichlorophenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2,4-Dichlorophenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2,4-Dimethylphenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2,4-Dinitrophenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2,4-Dinitrotoluene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2,6-Dinitrotoluene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2-Chloronaphthalene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2-Chlorophenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2-Methylnaphthalene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2-Methylphenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2-Nitroaniline	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
2-Nitrophenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
3,3'-Dichlorobenzidine	ND	ug/L	1.02	1/20/21 3:16	MAH	EPA 625.1	
3+4-Methylphenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
3-Nitroaniline	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	

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Analytical Results Report

(Continued)

Sample Location: IEP Comp.
Lab/Sample Number: WBA0332-01 Collect Date: 01/11/21 07:15
Date Received: 01/12/21 12:30 Collected By: Ben Carleton
Matrix: Water

Analyte	Result	Units	PQL	Analyzed	Analyst	Method	Qualifier
Semivolatiles (Continued)							
4,6-Dinitro-2-methylphenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
4-Bromophenyl-phenylether	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
4-Chloro-3-methylphenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
4-Chloroaniline	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
4-Chlorophenyl-phenylether	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
4-Nitroaniline	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
4-Nitrophenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Acenaphthene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Acenaphthylene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Aniline	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Anthracene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Benzidine	ND	ug/L	1.02	1/20/21 3:16	MAH	EPA 625.1	
Benzo(g,h,i)perylene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Benzo[a]anthracene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Benzo[a]pyrene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Benzo[b]fluoranthene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Benzo[k]fluoranthene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Benzyl alcohol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Benzyl Butyl Phthalate	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
bis(2-Chloroethoxy)methane	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
bis(2-Chloroethyl)ether	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
bis(2-chloroisopropyl)ether	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Carbazole	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Chrysene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Di (2-ethylhexyl) phthalate	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Dibenz(a,h)anthracene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Dibenzofuran	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Diethyl phthalate	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Dimethyl phthalate	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Di-n-butyl phthalate	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Di-n-octyl phthalate	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Fluoranthene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Fluorene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Hexachlorobenzene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Hexachlorobutadiene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Hexachlorocyclopentadiene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Hexachloroethane	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Indeno(1,2,3-cd)pyrene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Isophorone	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
m-Dichlorobenzene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Naphthalene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Nitrobenzene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
n-nitrosodimethylamine	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
n-Nitroso-di-n-propylamine	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
n-Nitrosodiphenylamine	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Pentachlorophenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	

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Analytical Results Report

(Continued)

Sample Location: IEP Comp.
Lab/Sample Number: WBA0332-01 Collect Date: 01/11/21 07:15
Date Received: 01/12/21 12:30 Collected By: Ben Carleton
Matrix: Water

Analyte	Result	Units	PQL	Analyzed	Analyst	Method	Qualifier
Semivolatiles (Continued)							
Phenanthrene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Phenol	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Pyrene	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Pyridine	ND	ug/L	0.510	1/20/21 3:16	MAH	EPA 625.1	
Surrogate: 2,4,6-Tribromophenol	*87.8%*		*41-141*	*1/20/21 3:16*	*MAH*	*EPA 625.1*	
Surrogate: 2-Fluorobiphenyl	*80.0%*		*12-129*	*1/20/21 3:16*	*MAH*	*EPA 625.1*	
Surrogate: 2-Fluorophenol	*58.6%*		*11-139*	*1/20/21 3:16*	*MAH*	*EPA 625.1*	
Surrogate: Nitrobenzene-d5	*86.6%*		*49-118*	*1/20/21 3:16*	*MAH*	*EPA 625.1*	
Surrogate: Phenol-2,3,4,5,6-d5	*58.0%*		*29-145*	*1/20/21 3:16*	*MAH*	*EPA 625.1*	
Surrogate: Terphenyl-d14	*80.7%*		*21-137*	*1/20/21 3:16*	*MAH*	*EPA 625.1*	
Volatiles							
1,1,1,2-Tetrachloroethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,1,1-Trichloroethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,1,2,2-Tetrachloroethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,1,2-Trichlorethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,1-Dichloroethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,1-Dichloroethylene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,1-Dichloropropene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,2,3-Trichlorobenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,2,3-Trichloropropane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,2,4-Trichlorobenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,2,4-Trimethylbenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,2-Dichlorobenzene (ortho-Dichlorobenzene)	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,2-Dichloroethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,2-Dichloropropane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,3,5-Trimethylbenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,3-Dichloropropane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
1,4-Dichlorobenzene (para-Dichlorobenzene)	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
2,2-Dichloropropane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
2-Chloroethyl vinyl ether	ND	ug/L	2.50	1/19/21 14:16	ARC	EPA 624.1	
2-hexanone	ND	ug/L	2.50	1/19/21 14:16	ARC	EPA 624.1	
Acetone	6.70	ug/L	2.50	1/19/21 14:16	ARC	EPA 624.1	
Acrolein	ND	ug/L	2.50	1/19/21 14:16	ARC	EPA 624.1	
Acrylonitrile	ND	ug/L	2.50	1/19/21 14:16	ARC	EPA 624.1	
Benzene	ND	ug/L	0.200	1/19/21 14:16	ARC	EPA 624.1	
Bromobenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	

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Analytical Results Report

(Continued)

Sample Location: IEP Comp.
Lab/Sample Number: WBA0332-01 Collect Date: 01/11/21 07:15
Date Received: 01/12/21 12:30 Collected By: Ben Carleton
Matrix: Water

Analyte	Result	Units	PQL	Analyzed	Analyst	Method	Qualifier
Volatiles (Continued)							
Bromochloromethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Bromodichloromethane	ND	ug/L	0.200	1/19/21 14:16	ARC	EPA 624.1	
Bromoform	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Bromomethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Carbon disulfide	ND	ug/L	2.50	1/19/21 14:16	ARC	EPA 624.1	
Carbon Tetrachloride	ND	ug/L	0.200	1/19/21 14:16	ARC	EPA 624.1	
Chlorobenzene (Monochlorobenzene)	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Chloroethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Chloroform	1.06	ug/L	0.200	1/19/21 14:16	ARC	EPA 624.1	
Chloromethane	1.56	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	W
cis-1,2-Dichloroethylene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
cis-1,3-Dichloropropene	ND	ug/L	0.200	1/19/21 14:16	ARC	EPA 624.1	
DBCP	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Dibromochloromethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Dibromomethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Dichlorodifluoromethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
EDB	ND	ug/L	0.200	1/19/21 14:16	ARC	EPA 624.1	
Ethylbenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Hexachlorobutadiene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Iodomethane	0.720	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Isopropylbenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
m/p Xylenes (MCL for total)	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
m-Dichlorobenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Methyl ethyl ketone (MEK)	ND	ug/L	2.50	1/19/21 14:16	ARC	EPA 624.1	
Methyl isobutyl ketone (MIBK)	ND	ug/L	2.50	1/19/21 14:16	ARC	EPA 624.1	
Methylene Chloride (Dichloromethane)	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
methyl-t-butyl ether (MTBE)	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Naphthalene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
n-Butylbenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
n-Propylbenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
o-Chlorotoluene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
o-Xylene (MCL for total)	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
p-Chlorotoluene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
p-isopropyltoluene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
sec-Butylbenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Styrene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
tert-Butylbenzene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Tetrachloroethylene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Toluene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Total Xylenes	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
trans-1,2 Dichloroethylene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
trans-1,3-Dichloropropene	ND	ug/L	0.200	1/19/21 14:16	ARC	EPA 624.1	
trans-1-4-Dichloro-2-butene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Trichloroethene	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Trichloroflouromethane	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	

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Analytical Results Report

(Continued)

Sample Location:	IEP Comp.		
Lab/Sample Number:	WBA0332-01	Collect Date:	01/11/21 07:15
Date Received:	01/12/21 12:30	Collected By:	Ben Carleton
Matrix:	Water		

Analyte	Result	Units	PQL	Analyzed	Analyst	Method	Qualifier
Volatiles (Continued)							
Vinyl acetate	ND	ug/L	0.500	1/19/21 14:16	ARC	EPA 624.1	
Vinyl Chloride	ND	ug/L	0.200	1/19/21 14:16	ARC	EPA 624.1	
Surrogate: 1,2-Dichlorobenzene-d4	*101%*		*60-140*	*1/19/21 14:16*	*ARC*	*EPA 624.1*	
Surrogate: 4-Bromofluorobenzene	*98.2%*		*60-140*	*1/19/21 14:16*	*ARC*	*EPA 624.1*	
Surrogate: Toluene-d8	*100%*		*60-140*	*1/19/21 14:16*	*ARC*	*EPA 624.1*	

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Analytical Results Report

(Continued)

Sample Location:	Trip Blanks		
Lab/Sample Number:	WBA0332-02	Collect Date:	01/11/21 07:15
Date Received:	01/12/21 12:30	Collected By:	Ben Carleton
Matrix:	Water		

Analyte	Result	Units	PQL	Analyzed	Analyst	Method	Qualifier
Volatiles							
1,1,1,2-Tetrachloroethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,1,1-Trichloroethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,1,2,2-Tetrachloroethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,1,2-Trichlorethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,1-Dichloroethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,1-Dichloroethylene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,1-Dichloropropene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,2,3-Trichlorobenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,2,3-Trichloropropane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,2,4-Trichlorobenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,2,4-Trimethylbenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,2-Dichlorobenzene (ortho-Dichlorobenzene)	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,2-Dichloroethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,2-Dichloropropane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,3,5-Trimethylbenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,3-Dichloropropane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
1,4-Dichlorobenzene (para-Dichlorobenzene)	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
2,2-Dichloropropane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
2-Chloroethyl vinyl ether	ND	ug/L	2.50	1/19/21 14:44	ARC	EPA 624.1	
2-hexanone	ND	ug/L	2.50	1/19/21 14:44	ARC	EPA 624.1	
Acetone	ND	ug/L	2.50	1/19/21 14:44	ARC	EPA 624.1	
Acrolein	ND	ug/L	2.50	1/19/21 14:44	ARC	EPA 624.1	
Acrylonitrile	ND	ug/L	2.50	1/19/21 14:44	ARC	EPA 624.1	
Benzene	ND	ug/L	0.200	1/19/21 14:44	ARC	EPA 624.1	
Bromobenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Bromochloromethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Bromodichloromethane	ND	ug/L	0.200	1/19/21 14:44	ARC	EPA 624.1	
Bromoform	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Bromomethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Carbon disulfide	ND	ug/L	2.50	1/19/21 14:44	ARC	EPA 624.1	
Carbon Tetrachloride	ND	ug/L	0.200	1/19/21 14:44	ARC	EPA 624.1	
Chlorobenzene (Monochlorobenzene)	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Chloroethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Chloroform	ND	ug/L	0.200	1/19/21 14:44	ARC	EPA 624.1	
Chloromethane	0.640	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	W
cis-1,2-Dichloroethylene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
cis-1,3-Dichloropropene	ND	ug/L	0.200	1/19/21 14:44	ARC	EPA 624.1	
DBCP	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Dibromochloromethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Dibromomethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Dichlorodifluoromethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
EDB	ND	ug/L	0.200	1/19/21 14:44	ARC	EPA 624.1	
Ethylbenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Hexachlorobutadiene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Iodomethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	

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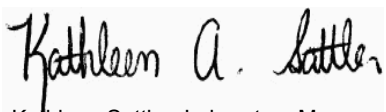
Analytical Results Report

(Continued)

Sample Location:	Trip Blanks		
Lab/Sample Number:	WBA0332-02	Collect Date:	01/11/21 07:15
Date Received:	01/12/21 12:30	Collected By:	Ben Carleton
Matrix:	Water		

Analyte	Result	Units	PQL	Analyzed	Analyst	Method	Qualifier
Volatiles (Continued)							
Isopropylbenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
m/p Xylenes (MCL for total)	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
m-Dichlorobenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Methyl ethyl ketone (MEK)	ND	ug/L	2.50	1/19/21 14:44	ARC	EPA 624.1	
Methyl isobutyl ketone (MIBK)	ND	ug/L	2.50	1/19/21 14:44	ARC	EPA 624.1	
Methylene Chloride (Dichloromethane)	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
methyl-t-butyl ether (MTBE)	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Naphthalene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
n-Butylbenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
n-Propylbenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
o-Chlorotoluene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
o-Xylene (MCL for total)	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
p-Chlorotoluene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
p-isopropyltoluene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
sec-Butylbenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Styrene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
tert-Butylbenzene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Tetrachloroethylene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Toluene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Total Xylenes	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
trans-1,2 Dichloroethylene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
trans-1,3-Dichloropropene	ND	ug/L	0.200	1/19/21 14:44	ARC	EPA 624.1	
trans-1-4-Dichloro-2-butene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Trichloroethene	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Trichloroflouromethane	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Vinyl acetate	ND	ug/L	0.500	1/19/21 14:44	ARC	EPA 624.1	
Vinyl Chloride	ND	ug/L	0.200	1/19/21 14:44	ARC	EPA 624.1	
Surrogate: 1,2-Dichlorobenzene-d4	*99.6%*		*70-130*	*1/19/21 14:44*	*ARC*	*EPA 624.1*	
Surrogate: 4-Bromofluorobenzene	*97.8%*		*70-130*	*1/19/21 14:44*	*ARC*	*EPA 624.1*	
Surrogate: Toluene-d8	*100%*		*70-130*	*1/19/21 14:44*	*ARC*	*EPA 624.1*	

Authorized Signature,



Kathleen Sattler, Laboratory Manager

W	Analyte was detected in both the sample and the associated trip blank.
PQL	Practical Quantitation Limit
ND	Not Detected
MCL	EPA's Maximum Contaminant Level
Dry	Sample results reported on a dry weight basis
*	Not a state-certified analyte

RPD	Relative Percent Difference
%REC	Percent Recovery
Source	Sample that was spiked or duplicated.

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Quality Control Data

Inorganics

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0516 - W FIA										
Blank (BBA0516-BLK1)					Prepared & Analyzed: 1/20/2021					
Cyanide	ND		0.0100	mg/L						
LCS (BBA0516-BS1)					Prepared & Analyzed: 1/20/2021					
Cyanide	0.0977		0.0100	mg/L	0.100		97.7	90-110		
LCS Dup (BBA0516-BSD1)					Prepared & Analyzed: 1/20/2021					
Cyanide	0.0982		0.0100	mg/L	0.100		98.2	90-110	0.510	20
Batch: BBA0565 - Inorganics										
Blank (BBA0565-BLK1)					Prepared & Analyzed: 1/22/2021					
Phenolics	ND		0.0500	mg/L						
LCS (BBA0565-BS1)					Prepared & Analyzed: 1/22/2021					
Phenolics	0.370		0.0500	mg/L	0.400		92.5	85-115		
Matrix Spike (BBA0565-MS1)		**Source: MBA0257-01**			Prepared & Analyzed: 1/22/2021					
Phenolics	0.350		0.0500	mg/L	0.400	ND	87.5	70-130		
Matrix Spike Dup (BBA0565-MSD1)		**Source: MBA0257-01**			Prepared & Analyzed: 1/22/2021					
Phenolics	0.370		0.0500	mg/L	0.400	ND	92.5	70-130	5.56	20

Quality Control Data

Metals by ICP-MS

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0459 - W 3010 Digest										
Blank (BBA0459-BLK1)					Prepared: 1/19/2021 Analyzed: 1/20/2021					
Titanium	ND		0.00100	mg/L						
Magnesium	ND		0.100	mg/L						
Boron	0.00121		0.00100	mg/L						
Manganese	ND		0.00100	mg/L						
Zinc	ND		0.00100	mg/L						
Cadmium	ND		0.00100	mg/L						
Copper	ND		0.00100	mg/L						
Chromium	ND		0.00100	mg/L						
Silver	ND		0.00100	mg/L						
Molybdenum	ND		0.00100	mg/L						
Thallium	ND		0.00100	mg/L						
Arsenic	ND		0.00100	mg/L						
Nickel	ND		0.00100	mg/L						
Selenium	ND		0.00100	mg/L						
Cobalt	ND		0.00100	mg/L						
Barium	ND		0.00100	mg/L						
Antimony	ND		0.00100	mg/L						
Beryllium	ND		0.00100	mg/L						
Aluminum	ND		0.0100	mg/L						
Iron	ND		0.0100	mg/L						
Tin	ND		0.00100	mg/L						

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Quality Control Data
(Continued)

Metals by ICP-MS (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0459 - W 3010 Digest (Continued)										
Blank (BBA0459-BLK1)					Prepared: 1/19/2021 Analyzed: 1/20/2021					
Lead	ND		0.00100	mg/L						
LCS (BBA0459-BS1)					Prepared: 1/19/2021 Analyzed: 1/20/2021					
Molybdenum	0.0534		0.00100	mg/L	0.0500		107	85-115		
Beryllium	0.0526		0.00100	mg/L	0.0500		105	85-115		
Manganese	0.0512		0.00100	mg/L	0.0500		102	85-115		
Copper	0.0495		0.00100	mg/L	0.0500		99.0	85-115		
Magnesium	10.6		0.100	mg/L	10.0		106	85-115		
Cobalt	0.0483		0.00100	mg/L	0.0500		96.7	85-115		
Iron	0.0952		0.0100	mg/L	0.100		95.2	85-115		
Cadmium	0.0516		0.00100	mg/L	0.0500		103	85-115		
Arsenic	0.0494		0.00100	mg/L	0.0500		98.8	85-115		
Thallium	0.0497		0.00100	mg/L	0.0500		99.3	85-115		
Silver	0.0524		0.00100	mg/L	0.0500		105	85-115		
Tin	0.0508		0.00100	mg/L	0.0500		102	85-115		
Antimony	0.0496		0.00100	mg/L	0.0500		99.2	85-115		
Aluminum	0.102		0.0100	mg/L	0.100		102	85-115		
Boron	0.0496		0.00100	mg/L	0.0500		99.2	85-115		
Nickel	0.0497		0.00100	mg/L	0.0500		99.4	85-115		
Lead	0.0488		0.00100	mg/L	0.0500		97.6	85-115		
Zinc	0.0480		0.00100	mg/L	0.0500		96.0	85-115		
Titanium	0.0508		0.00100	mg/L	0.0500		102	85-115		
Chromium	0.0502		0.00100	mg/L	0.0500		100	85-115		
Selenium	0.0483		0.00100	mg/L	0.0500		96.5	85-115		
Barium	0.0506		0.00100	mg/L	0.0500		101	85-115		
Matrix Spike (BBA0459-MS1)		**Source: WBA0341-01**			Prepared: 1/19/2021 Analyzed: 1/20/2021					
Arsenic	0.236		0.00500	mg/L	0.250	0.000401	94.3	70-130		
Beryllium	0.245		0.00500	mg/L	0.250	ND	98.1	70-130		
Aluminum	0.837		0.0500	mg/L	0.500	0.271	113	70-130		
Boron	0.264		0.00500	mg/L	0.250	0.00871	102	70-130		
Silver	0.249		0.00500	mg/L	0.250	ND	99.7	70-130		
Cobalt	0.229		0.00500	mg/L	0.250	0.000231	91.5	70-130		
Barium	0.243		0.00500	mg/L	0.250	0.00456	95.5	70-130		
Cadmium	0.245		0.00500	mg/L	0.250	ND	97.9	70-130		
Antimony	0.295		0.00500	mg/L	0.250	0.00105	118	70-130		
Chromium	0.239		0.00500	mg/L	0.250	0.000804	95.3	70-130		
Zinc	0.243		0.00500	mg/L	0.250	0.0143	91.5	70-130		
Lead	0.235		0.00500	mg/L	0.250	0.00101	93.6	70-130		
Molybdenum	0.261		0.00500	mg/L	0.250	ND	104	70-130		
Nickel	0.232		0.00500	mg/L	0.250	0.000457	92.4	70-130		
Titanium	0.272		0.00500	mg/L	0.250	0.0205	101	70-130		
Manganese	0.255		0.00500	mg/L	0.250	0.0132	96.7	70-130		
Selenium	0.232		0.00500	mg/L	0.250	ND	92.6	70-130		
Magnesium	53.9		0.500	mg/L	50.0	1.17	105	70-130		
Iron	0.946		0.0500	mg/L	0.500	0.458	97.5	70-130		
Tin	0.266		0.00500	mg/L	0.250	ND	106	70-130		
Copper	0.233		0.00500	mg/L	0.250	0.00211	92.2	70-130		
Thallium	0.244		0.00500	mg/L	0.250	ND	97.4	70-130		

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Quality Control Data
(Continued)

Metals by ICP-MS (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0459 - W 3010 Digest (Continued)										
Matrix Spike Dup (BBA0459-MSD1)		**Source: WBA0341-01**			Prepared: 1/19/2021 Analyzed: 1/20/2021					
Zinc	0.248		0.00500	mg/L	0.250	0.0143	93.3	70-130	1.85	20
Silver	0.257		0.00500	mg/L	0.250	ND	103	70-130	2.93	20
Selenium	0.237		0.00500	mg/L	0.250	ND	94.6	70-130	2.12	20
Aluminum	0.852		0.0500	mg/L	0.500	0.271	116	70-130	1.77	20
Molybdenum	0.265		0.00500	mg/L	0.250	ND	106	70-130	1.88	20
Titanium	0.275		0.00500	mg/L	0.250	0.0205	102	70-130	0.952	20
Thallium	0.243		0.00500	mg/L	0.250	ND	97.1	70-130	0.339	20
Arsenic	0.245		0.00500	mg/L	0.250	0.000401	97.7	70-130	3.53	20
Lead	0.238		0.00500	mg/L	0.250	0.00101	94.9	70-130	1.35	20
Cadmium	0.250		0.00500	mg/L	0.250	ND	99.9	70-130	2.06	20
Boron	0.268		0.00500	mg/L	0.250	0.00871	104	70-130	1.36	20
Antimony	0.303		0.00500	mg/L	0.250	0.00105	121	70-130	2.64	20
Nickel	0.237		0.00500	mg/L	0.250	0.000457	94.4	70-130	2.14	20
Barium	0.252		0.00500	mg/L	0.250	0.00456	99.1	70-130	3.56	20
Manganese	0.260		0.00500	mg/L	0.250	0.0132	98.7	70-130	1.96	20
Beryllium	0.256		0.00500	mg/L	0.250	ND	102	70-130	4.20	20
Magnesium	54.2		0.500	mg/L	50.0	1.17	106	70-130	0.519	20
Iron	0.975		0.0500	mg/L	0.500	0.458	103	70-130	3.04	20
Tin	0.269		0.00500	mg/L	0.250	ND	108	70-130	1.23	20
Copper	0.239		0.00500	mg/L	0.250	0.00211	94.8	70-130	2.83	20
Cobalt	0.235		0.00500	mg/L	0.250	0.000231	94.0	70-130	2.74	20
Chromium	0.247		0.00500	mg/L	0.250	0.000804	98.4	70-130	3.15	20

Quality Control Data
(Continued)

Semivolatiles

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0347 - SVOC Water										
Blank (BBA0347-BLK1)					Prepared: 1/14/2021 Analyzed: 1/19/2021					
Pyridine	ND		0.500	ug/L						
1,2,4-Trichlorobenzene	ND		0.500	ug/L						
Hexachloroethane	ND		0.500	ug/L						
Pyrene	ND		0.500	ug/L						
4,6-Dinitro-2-methylphenol	ND		0.500	ug/L						
2-Methylnaphthalene	ND		0.500	ug/L						
2-Methylphenol	ND		0.500	ug/L						
2-Nitroaniline	ND		0.500	ug/L						
2-Nitrophenol	ND		0.500	ug/L						
3,3'-Dichlorobenzidine	ND		1.00	ug/L						
Acenaphthylene	ND		0.500	ug/L						
3-Nitroaniline	ND		0.500	ug/L						
2,6-Dinitrotoluene	ND		0.500	ug/L						
4-Bromophenyl-phenylether	ND		0.500	ug/L						
4-Chloro-3-methylphenol	ND		0.500	ug/L						
4-Chloroaniline	ND		0.500	ug/L						
4-Chlorophenyl-phenylether	ND		0.500	ug/L						
4-Nitroaniline	ND		0.500	ug/L						

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Quality Control Data
(Continued)

Semivolatiles (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0347 - SVOC Water (Continued)										
Blank (BBA0347-BLK1)					Prepared: 1/14/2021 Analyzed: 1/19/2021					
4-Nitrophenol	ND		0.500	ug/L						
Isophorone	ND		0.500	ug/L						
3+4-Methylphenol	ND		0.500	ug/L						
2,3,5,6-Tetrachlorophenol	ND		0.500	ug/L						
1,2-Dichlorobenzene (ortho-Dichlorobenzene)	ND		0.500	ug/L						
1,2-Dinitrobenzene	ND		0.500	ug/L						
1,2-Diphenyl hydrazine	ND		0.500	ug/L						
m-Dichlorobenzene	ND		0.500	ug/L						
1,3-Dinitrobenzene	ND		0.500	ug/L						
1,4-Dichlorobenzene (para-Dichlorobenzene)	ND		0.500	ug/L						
1,4-Dinitrobenzene	ND		0.500	ug/L						
2-Chlorophenol	ND		0.500	ug/L						
2,3,4,6-Tetrachlorophenol	ND		0.500	ug/L						
2-Chloronaphthalene	ND		0.500	ug/L						
2,4,5-Trichlorophenol	ND		0.500	ug/L						
2,4,6-Trichlorophenol	ND		0.500	ug/L						
2,4-Dichlorophenol	ND		0.500	ug/L						
2,4-Dimethylphenol	ND		0.500	ug/L						
2,4-Dinitrophenol	ND		0.500	ug/L						
2,4-Dinitrotoluene	ND		0.500	ug/L						
Aniline	ND		0.500	ug/L						
1-Methylnaphthalene	ND		0.500	ug/L						
Nitrobenzene	ND		0.500	ug/L						
Acenaphthene	ND		0.500	ug/L						
Di-n-octyl phthalate	ND		0.500	ug/L						
Fluoranthene	ND		0.500	ug/L						
Fluorene	ND		0.500	ug/L						
Hexachlorobenzene	ND		0.500	ug/L						
Hexachlorobutadiene	ND		0.500	ug/L						
Hexachlorocyclopentadiene	ND		0.500	ug/L						
Dimethyl phthalate	ND		0.500	ug/L						
Naphthalene	ND		0.500	ug/L						
Diethyl phthalate	ND		0.500	ug/L						
n-nitrosodimethylamine	ND		0.500	ug/L						
n-Nitroso-di-n-propylamine	ND		0.500	ug/L						
n-Nitrosodiphenylamine	ND		0.500	ug/L						
Pentachlorophenol	ND		0.500	ug/L						
Phenanthrene	ND		0.500	ug/L						
Phenol	ND		0.500	ug/L						
Indeno(1,2,3-cd)pyrene	ND		0.500	ug/L						
bis(2-Chloroethyl)ether	ND		0.500	ug/L						
Anthracene	ND		0.500	ug/L						
Benzidine	ND		1.00	ug/L						
Benzo[a]anthracene	ND		0.500	ug/L						
Benzo[a]pyrene	ND		0.500	ug/L						
Benzo[b]fluoranthene	ND		0.500	ug/L						
Benzo(g,h,i)perylene	ND		0.500	ug/L						
Benzo[k]fluoranthene	ND		0.500	ug/L						
Di-n-butyl phthalate	ND		0.500	ug/L						
bis(2-Chloroethoxy)methane	ND		0.500	ug/L						

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Quality Control Data

(Continued)

Semivolatiles (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0347 - SVOC Water (Continued)										
Blank (BBA0347-BLK1)					Prepared: 1/14/2021 Analyzed: 1/19/2021					
bis(2-chloroisopropyl)ether	ND		0.500	ug/L						
Di (2-ethylhexyl) phthalate	ND		0.500	ug/L						
Benzyl Butyl Phthalate	ND		0.500	ug/L						
Carbazole	ND		0.500	ug/L						
Chrysene	ND		0.500	ug/L						
Dibenz(a,h)anthracene	ND		0.500	ug/L						
Dibenzofuran	ND		0.500	ug/L						
Benzyl alcohol	ND		0.500	ug/L						
Surrogate: Phenol-2,3,4,5,6-d5			*42.4*	*ug/L*	*50.5*		*83.9*	*29-145*		
Surrogate: Nitrobenzene-d5			*20.2*	*ug/L*	*25.0*		*80.7*	*49-118*		
Surrogate: Terphenyl-d14			*24.3*	*ug/L*	*25.8*		*94.3*	*21-137*		
Surrogate: 2-Fluorophenol			*40.8*	*ug/L*	*50.0*		*81.6*	*11-139*		
Surrogate: 2-Fluorobiphenyl			*18.5*	*ug/L*	*25.5*		*72.7*	*12-129*		
Surrogate: 2,4,6-Tribromophenol			*41.8*	*ug/L*	*51.8*		*80.7*	*41-141*		
LCS (BBA0347-BS1)					Prepared: 1/14/2021 Analyzed: 1/19/2021					
Benzo[a]pyrene	4.69		0.500	ug/L	5.00		93.8	50-130		
Acenaphthylene	4.16		0.500	ug/L	5.00		83.2	50-130		
Carbazole	4.81		0.500	ug/L	5.00		96.2	50-130		
2-Nitrophenol	4.22		0.500	ug/L	5.00		84.4	50-130		
3+4-Methylphenol	4.33		0.500	ug/L	5.00		86.6	50-130		
4,6-Dinitro-2-methylphenol	4.22		0.500	ug/L	5.00		84.4	50-130		
4-Bromophenyl-phenylether	4.55		0.500	ug/L	5.00		91.0	50-130		
4-Chloro-3-methylphenol	4.38		0.500	ug/L	5.00		87.6	50-130		
4-Chloroaniline	4.04		0.500	ug/L	5.00		80.8	50-130		
4-Chlorophenyl-phenylether	4.55		0.500	ug/L	5.00		91.0	50-130		
4-Nitroaniline	4.29		0.500	ug/L	5.00		85.8	50-130		
2-Methylphenol	4.43		0.500	ug/L	5.00		88.6	50-130		
Acenaphthene	4.34		0.500	ug/L	5.00		86.8	50-130		
2-Methylnaphthalene	4.49		0.500	ug/L	5.00		89.8	50-130		
Anthracene	4.57		0.500	ug/L	5.00		91.4	50-130		
Benzo[a]anthracene	4.58		0.500	ug/L	5.00		91.6	50-130		
Benzo(g,h,i)perylene	4.87		0.500	ug/L	5.00		97.4	50-130		
Benzo[b]fluoranthene	4.61		0.500	ug/L	5.00		92.2	50-130		
bis(2-Chloroethoxy)methane	4.54		0.500	ug/L	5.00		90.8	50-130		
bis(2-Chloroethyl)ether	4.55		0.500	ug/L	5.00		91.0	50-130		
bis(2-chloroisopropyl)ether	4.45		0.500	ug/L	5.00		89.0	50-130		
Di (2-ethylhexyl) phthalate	4.66		0.500	ug/L	5.00		93.2	50-130		
Benzyl Butyl Phthalate	4.33		0.500	ug/L	5.00		86.6	50-130		
4-Nitrophenol	3.69		0.500	ug/L	5.00		73.8	50-130		
2,4,5-Trichlorophenol	4.21		0.500	ug/L	5.00		84.2	50-130		
1,2,4-Trichlorobenzene	4.45		0.500	ug/L	5.00		89.0	50-130		
1,2-Dichlorobenzene (ortho-Dichlorobenzene)	4.44		0.500	ug/L	5.00		88.8	50-130		
1,2-Dinitrobenzene	4.53		0.500	ug/L	5.00		90.6	50-130		
1,2-Diphenyl hydrazine	4.51		0.500	ug/L				50-130		
m-Dichlorobenzene	4.44		0.500	ug/L	5.00		88.8	50-130		
1,3-Dinitrobenzene	4.43		0.500	ug/L	5.00		88.6	50-130		
1,4-Dichlorobenzene (para-Dichlorobenzene)	4.41		0.500	ug/L	5.00		88.2	50-130		
1,4-Dinitrobenzene	4.16		0.500	ug/L	5.00		83.2	50-130		
1-Methylnaphthalene	4.55		0.500	ug/L	5.00		91.0	50-130		
2-Nitroaniline	4.43		0.500	ug/L	5.00		88.6	50-130		

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Quality Control Data
(Continued)

Semivolatiles (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0347 - SVOC Water (Continued)										
LCS (BBA0347-BS1)					Prepared: 1/14/2021 Analyzed: 1/19/2021					
2,3,5,6-Tetrachlorophenol	4.33		0.500	ug/L	5.00		86.6	50-130		
Benzo[k]fluoranthene	5.05		0.500	ug/L	5.00		101	50-130		
2,4,6-Trichlorophenol	4.30		0.500	ug/L	5.00		86.0	50-130		
2,4-Dichlorophenol	4.40		0.500	ug/L	5.00		88.0	50-130		
2,4-Dinitrotoluene	4.56		0.500	ug/L	5.00		91.2	50-130		
2,6-Dinitrotoluene	4.65		0.500	ug/L	5.00		93.0	50-130		
2-Chloronaphthalene	4.35		0.500	ug/L	5.00		87.0	50-130		
2-Chlorophenol	4.28		0.500	ug/L	5.00		85.6	50-130		
2,3,4,6-Tetrachlorophenol	4.49		0.500	ug/L	5.00		89.8	50-130		
n-Nitrosodiphenylamine	4.44		0.500	ug/L	5.00		88.8	50-130		
Chrysene	4.85		0.500	ug/L	5.00		97.0	50-130		
Pyrene	4.64		0.500	ug/L	5.00		92.8	50-130		
Phenol	4.13		0.500	ug/L	5.00		82.6	50-130		
Pentachlorophenol	3.95		0.500	ug/L	5.00		79.0	50-130		
n-Nitroso-di-n-propylamine	4.49		0.500	ug/L	5.00		89.8	50-130		
Nitrobenzene	4.39		0.500	ug/L	5.00		87.8	50-130		
Naphthalene	4.50		0.500	ug/L	5.00		90.0	50-130		
Isophorone	4.61		0.500	ug/L	5.00		92.2	50-130		
Indeno(1,2,3-cd)pyrene	4.62		0.500	ug/L	5.00		92.4	50-130		
Di-n-butyl phthalate	4.95		0.500	ug/L	5.00		99.0	50-130		
Dibenz(a,h)anthracene	4.58		0.500	ug/L	5.00		91.6	50-130		
Phenanthrene	4.67		0.500	ug/L	5.00		93.4	50-130		
Hexachloroethane	4.40		0.500	ug/L	5.00		88.0	50-130		
Diethyl phthalate	4.75		0.500	ug/L	5.00		95.0	50-130		
Dimethyl phthalate	4.69		0.500	ug/L	5.00		93.8	50-130		
Dibenzofuran	4.49		0.500	ug/L	5.00		89.8	50-130		
Di-n-octyl phthalate	4.05		0.500	ug/L	5.00		81.0	50-130		
Fluoranthene	4.99		0.500	ug/L	5.00		99.8	50-130		
Fluorene	4.61		0.500	ug/L	5.00		92.2	50-130		
Hexachlorobenzene	4.65		0.500	ug/L	5.00		93.0	50-130		
Hexachlorobutadiene	4.40		0.500	ug/L	5.00		88.0	50-130		
Surrogate: Phenol-2,3,4,5,6-d5			*43.9*	*ug/L*	*50.5*		*87.0*	*29-145*		
Surrogate: Nitrobenzene-d5			*22.0*	*ug/L*	*25.0*		*87.8*	*49-118*		
Surrogate: Terphenyl-d14			*21.7*	*ug/L*	*25.8*		*84.3*	*21-137*		
Surrogate: 2-Fluorophenol			*44.2*	*ug/L*	*50.0*		*88.4*	*11-139*		
Surrogate: 2-Fluorobiphenyl			*21.4*	*ug/L*	*25.5*		*84.1*	*12-129*		
Surrogate: 2,4,6-Tribromophenol			*43.5*	*ug/L*	*51.8*		*84.0*	*41-141*		

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Quality Control Data
(Continued)

Semivolatiles (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0347 - SVOC Water (Continued)										
LCS Dup (BBA0347-BSD1)					Prepared: 1/14/2021 Analyzed: 1/19/2021					
Dibenzofuran	5.04		0.500	ug/L	5.00		101	50-130	11.5	25
Dibenz(a,h)anthracene	4.97		0.500	ug/L	5.00		99.4	50-130	8.17	25
bis(2-chloroisopropyl)ether	4.95		0.500	ug/L	5.00		99.0	50-130	10.6	25
Carbazole	5.29		0.500	ug/L	5.00		106	50-130	9.50	25
Benzyl Butyl Phthalate	5.16		0.500	ug/L	5.00		103	50-130	17.5	25
Di (2-ethylhexyl) phthalate	5.29		0.500	ug/L	5.00		106	50-130	12.7	25
Chrysene	5.31		0.500	ug/L	5.00		106	50-130	9.06	25
bis(2-Chloroethyl)ether	5.07		0.500	ug/L	5.00		101	50-130	10.8	25
Nitrobenzene	4.84		0.500	ug/L	5.00		96.8	50-130	9.75	25
bis(2-Chloroethoxy)methane	5.12		0.500	ug/L	5.00		102	50-130	12.0	25
Benzo[k]fluoranthene	5.61		0.500	ug/L	5.00		112	50-130	10.5	25
n-Nitroso-di-n-propylamine	5.30		0.500	ug/L	5.00		106	50-130	16.5	25
Benzo[b]fluoranthene	5.17		0.500	ug/L	5.00		103	50-130	11.5	25
Diethyl phthalate	5.08		0.500	ug/L	5.00		102	50-130	6.71	25
Benzo(g,h,i)perylene	5.30		0.500	ug/L	5.00		106	50-130	8.46	25
Naphthalene	4.94		0.500	ug/L	5.00		98.8	50-130	9.32	25
Fluorene	5.06		0.500	ug/L	5.00		101	50-130	9.31	25
Isophorone	5.09		0.500	ug/L	5.00		102	50-130	9.90	25
1,4-Dinitrobenzene	5.03		0.500	ug/L	5.00		101	50-130	18.9	25
Hexachloroethane	4.62		0.500	ug/L	5.00		92.4	50-130	4.88	25
Indeno(1,2,3-cd)pyrene	5.09		0.500	ug/L	5.00		102	50-130	9.68	25
Dimethyl phthalate	5.06		0.500	ug/L	5.00		101	50-130	7.59	25
Benzo[a]pyrene	5.23		0.500	ug/L	5.00		105	50-130	10.9	25
Di-n-butyl phthalate	5.49		0.500	ug/L	5.00		110	50-130	10.3	25
Fluoranthene	5.26		0.500	ug/L	5.00		105	50-130	5.27	25
n-Nitrosodiphenylamine	5.13		0.500	ug/L	5.00		103	50-130	14.4	25
Hexachlorobenzene	5.07		0.500	ug/L	5.00		101	50-130	8.64	25
Pyrene	5.31		0.500	ug/L	5.00		106	50-130	13.5	25
Phenol	4.55		0.500	ug/L	5.00		91.0	50-130	9.68	25
Phenanthrene	5.14		0.500	ug/L	5.00		103	50-130	9.58	25
Pentachlorophenol	4.89		0.500	ug/L	5.00		97.8	50-130	21.3	25
Di-n-octyl phthalate	4.93		0.500	ug/L	5.00		98.6	50-130	19.6	25
1-Methylnaphthalene	5.11		0.500	ug/L	5.00		102	50-130	11.6	25
2,6-Dinitrotoluene	5.18		0.500	ug/L	5.00		104	50-130	10.8	25
2,4-Dinitrotoluene	4.99		0.500	ug/L	5.00		99.8	50-130	9.01	25
2,4-Dichlorophenol	5.02		0.500	ug/L	5.00		100	50-130	13.2	25
1,2,4-Trichlorobenzene	4.70		0.500	ug/L	5.00		94.0	50-130	5.46	25
1,2-Dichlorobenzene (ortho-Dichlorobenzene)	4.75		0.500	ug/L	5.00		95.0	50-130	6.75	25
1,2-Dinitrobenzene	5.06		0.500	ug/L	5.00		101	50-130	11.1	25
2-Chloronaphthalene	4.94		0.500	ug/L	5.00		98.8	50-130	12.7	25
1,4-Dichlorobenzene (para-Dichlorobenzene)	4.66		0.500	ug/L	5.00		93.2	50-130	5.51	25
1,2-Diphenyl hydrazine	5.24		0.500	ug/L				50-130	15.0	25
Hexachlorobutadiene	4.52		0.500	ug/L	5.00		90.4	50-130	2.69	25
2,3,5,6-Tetrachlorophenol	4.93		0.500	ug/L	5.00		98.6	50-130	13.0	25
2,4,5-Trichlorophenol	4.82		0.500	ug/L	5.00		96.4	50-130	13.5	25
2,4,6-Trichlorophenol	4.93		0.500	ug/L	5.00		98.6	50-130	13.7	25
Benzo[a]anthracene	5.18		0.500	ug/L	5.00		104	50-130	12.3	25
2,3,4,6-Tetrachlorophenol	4.91		0.500	ug/L	5.00		98.2	50-130	8.94	25
m-Dichlorobenzene	4.70		0.500	ug/L	5.00		94.0	50-130	5.69	25
4-Chloro-3-methylphenol	5.09		0.500	ug/L	5.00		102	50-130	15.0	25

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Quality Control Data
(Continued)

Semivolatiles (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0347 - SVOC Water (Continued)										
LCS Dup (BBA0347-BSD1)					Prepared: 1/14/2021 Analyzed: 1/19/2021					
Anthracene	5.13		0.500	ug/L	5.00		103	50-130	11.5	25
Acenaphthylene	4.69		0.500	ug/L	5.00		93.8	50-130	12.0	25
1,3-Dinitrobenzene	5.08		0.500	ug/L	5.00		102	50-130	13.7	25
2-Chlorophenol	4.75		0.500	ug/L	5.00		95.0	50-130	10.4	25
4-Nitrophenol	4.63		0.500	ug/L	5.00		92.6	50-130	22.6	25
4-Nitroaniline	4.74		0.500	ug/L	5.00		94.8	50-130	9.97	25
4-Chloroaniline	4.65		0.500	ug/L	5.00		93.0	50-130	14.0	25
Acenaphthene	4.83		0.500	ug/L	5.00		96.6	50-130	10.7	25
4-Bromophenyl-phenylether	5.16		0.500	ug/L	5.00		103	50-130	12.6	25
2-Methylphenol	4.99		0.500	ug/L	5.00		99.8	50-130	11.9	25
4-Chlorophenyl-phenylether	5.00		0.500	ug/L	5.00		100	50-130	9.42	25
2-Methylnaphthalene	5.06		0.500	ug/L	5.00		101	50-130	11.9	25
2-Nitroaniline	5.25		0.500	ug/L	5.00		105	50-130	16.9	25
2-Nitrophenol	4.90		0.500	ug/L	5.00		98.0	50-130	14.9	25
3+4-Methylphenol	5.07		0.500	ug/L	5.00		101	50-130	15.7	25
4,6-Dinitro-2-methylphenol	5.32		0.500	ug/L	5.00		106	50-130	23.1	25
Surrogate: Phenol-2,3,4,5,6-d5			*46.5*	*ug/L*	*50.5*		*92.0*	*29-145*		
Surrogate: Nitrobenzene-d5			*22.4*	*ug/L*	*25.0*		*89.5*	*49-118*		
Surrogate: Terphenyl-d14			*22.7*	*ug/L*	*25.8*		*88.0*	*21-137*		
Surrogate: 2-Fluorophenol			*43.7*	*ug/L*	*50.0*		*87.5*	*11-139*		
Surrogate: 2-Fluorobiphenyl			*21.9*	*ug/L*	*25.5*		*86.0*	*12-129*		
Surrogate: 2,4,6-Tribromophenol			*48.2*	*ug/L*	*51.8*		*93.1*	*41-141*		

Batch: BBA0423 - Pesticides

Blank (BBA0423-BLK1)					Prepared & Analyzed: 1/18/2021					
alpha-BHC	ND		0.0100	ug/L						
Lindane (BHC-gamma)	ND		0.0100	ug/L						
beta-BHC	ND		0.0100	ug/L						
delta-BHC	ND		0.0100	ug/L						
Heptachlor	ND		0.0100	ug/L						
Aldrin	ND		0.0100	ug/L						
Heptachlor epoxide	ND		0.0100	ug/L						
4,4'-DDE	ND		0.0100	ug/L						
Endosulfan I	ND		0.0100	ug/L						
Dieldrin	ND		0.0100	ug/L						
Endrin	ND		0.0100	ug/L						
4,4'-DDD	ND		0.0100	ug/L						
Endosulfan II	ND		0.0100	ug/L						
4,4'-DDT	ND		0.0100	ug/L						
Endrin aldehyde	ND		0.0100	ug/L						
Methoxychlor	ND		0.0100	ug/L						
Endosulfan sulfate	ND		0.0100	ug/L						
Endrin ketone	ND		0.0100	ug/L						
Arochlor 1016 (1)	ND		0.200	ug/L						
Arochlor 1221 (1)	ND		0.200	ug/L						
Arochlor 1232 (1)	ND		0.200	ug/L						
Arochlor 1242 (1)	ND		0.200	ug/L						
Arochlor 1248 (1)	ND		0.200	ug/L						
Arochlor 1254 (1)	ND		0.200	ug/L						
Arochlor 1260 (1)	ND		0.200	ug/L						

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Quality Control Data
(Continued)

Semivolatiles (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0423 - Pesticides (Continued)										
Blank (BBA0423-BLK1)					Prepared & Analyzed: 1/18/2021					
Chlordane (Total)	ND		0.100	ug/L						
Toxaphene	ND		0.100	ug/L						
Surrogate: DCB			*2.38*	*ug/L*	*2.50*		*95.4*	*40-130*		
LCS (BBA0423-BS1)					Prepared & Analyzed: 1/18/2021					
alpha-BHC	0.513		0.0100	ug/L	0.500		103	70-130		
Lindane (BHC-gamma)	0.509		0.0100	ug/L	0.500		102	70-130		
beta-BHC	0.451		0.0100	ug/L	0.500		90.2	70-130		
delta-BHC	0.492		0.0100	ug/L	0.500		98.4	70-130		
Heptachlor	0.441		0.0100	ug/L	0.500		88.3	70-130		
Aldrin	0.421		0.0100	ug/L	0.500		84.2	70-130		
Heptachlor epoxide	0.481		0.0100	ug/L	0.500		96.2	70-130		
4,4'-DDE	0.473		0.0100	ug/L	0.500		94.6	70-130		
Endosulfan I	0.468		0.0100	ug/L	0.500		93.7	70-130		
Dieldrin	0.474		0.0100	ug/L	0.500		94.8	70-130		
Endrin	0.476		0.0100	ug/L	0.500		95.2	70-130		
4,4'-DDD	0.451		0.0100	ug/L	0.500		90.1	70-130		
Endosulfan II	0.461		0.0100	ug/L	0.500		92.2	70-130		
4,4'-DDT	0.529		0.0100	ug/L	0.500		106	70-130		
Endrin aldehyde	0.387		0.0100	ug/L	0.500		77.5	70-130		
Methoxychlor	0.510		0.0100	ug/L	0.500		102	70-130		
Endosulfan sulfate	0.467		0.0100	ug/L	0.500		93.3	70-130		
Endrin ketone	0.469		0.0100	ug/L	0.500		93.8	70-130		
Surrogate: DCB			*2.39*	*ug/L*	*2.50*		*95.5*	*40-130*		
Matrix Spike (BBA0423-MS1)		**Source: MBA0325-06**			Prepared: 1/18/2021 Analyzed: 1/19/2021					
alpha-BHC	0.482		0.0100	ug/L	0.500	ND	96.3	70-130		
Lindane (BHC-gamma)	0.494		0.0100	ug/L	0.500	ND	98.7	70-130		
beta-BHC	0.456		0.0100	ug/L	0.500	ND	91.2	70-130		
delta-BHC	0.480		0.0100	ug/L	0.500	ND	96.1	70-130		
Heptachlor	0.426		0.0100	ug/L	0.500	ND	85.2	70-130		
Aldrin	0.399		0.0100	ug/L	0.500	ND	79.9	70-130		
Heptachlor epoxide	0.488		0.0100	ug/L	0.500	ND	97.6	70-130		
4,4'-DDE	0.473		0.0100	ug/L	0.500	ND	94.6	70-130		
Endosulfan I	0.436		0.0100	ug/L	0.500	ND	87.1	70-130		
Dieldrin	0.506		0.0100	ug/L	0.500	ND	101	70-130		
Endrin	0.479		0.0100	ug/L	0.500	ND	95.8	70-130		
4,4'-DDD	0.480		0.0100	ug/L	0.500	ND	96.0	70-130		
Endosulfan II	0.477		0.0100	ug/L	0.500	ND	95.4	70-130		
4,4'-DDT	0.456		0.0100	ug/L	0.500	ND	91.1	70-130		
Endrin aldehyde	0.436		0.0100	ug/L	0.500	ND	87.3	70-130		
Methoxychlor	0.476		0.0100	ug/L	0.500	ND	95.1	70-130		
Endosulfan sulfate	0.484		0.0100	ug/L	0.500	ND	96.7	70-130		
Endrin ketone	0.484		0.0100	ug/L	0.500	ND	96.8	70-130		
Surrogate: DCB			*2.42*	*ug/L*	*2.50*		*96.8*	*40-130*		

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Quality Control Data
(Continued)

Semivolatiles (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0423 - Pesticides (Continued)										
Matrix Spike Dup (BBA0423-MSD1)		**Source: MBA0325-06**			Prepared: 1/18/2021 Analyzed: 1/19/2021					
alpha-BHC	0.484		0.0100	ug/L	0.500	ND	96.7	70-130	0.404	30
Lindane (BHC-gamma)	0.497		0.0100	ug/L	0.500	ND	99.5	70-130	0.737	30
beta-BHC	0.452		0.0100	ug/L	0.500	ND	90.3	70-130	0.893	30
delta-BHC	0.482		0.0100	ug/L	0.500	ND	96.4	70-130	0.291	30
Heptachlor	0.426		0.0100	ug/L	0.500	ND	85.2	70-130	0.0469	30
Aldrin	0.395		0.0100	ug/L	0.500	ND	79.0	70-130	1.10	30
Heptachlor epoxide	0.483		0.0100	ug/L	0.500	ND	96.6	70-130	1.02	30
4,4'-DDE	0.462		0.0100	ug/L	0.500	ND	92.5	70-130	2.20	30
Endosulfan I	0.429		0.0100	ug/L	0.500	ND	85.8	70-130	1.58	30
Dieldrin	0.489		0.0100	ug/L	0.500	ND	97.9	70-130	3.30	30
Endrin	0.480		0.0100	ug/L	0.500	ND	96.0	70-130	0.302	30
4,4'-DDD	0.461		0.0100	ug/L	0.500	ND	92.3	70-130	4.00	30
Endosulfan II	0.446		0.0100	ug/L	0.500	ND	89.2	70-130	6.71	30
4,4'-DDT	0.479		0.0100	ug/L	0.500	ND	95.8	70-130	5.03	30
Endrin aldehyde	0.421		0.0100	ug/L	0.500	ND	84.3	70-130	3.52	30
Methoxychlor	0.495		0.0100	ug/L	0.500	ND	98.9	70-130	3.93	30
Endosulfan sulfate	0.477		0.0100	ug/L	0.500	ND	95.3	70-130	1.46	30
Endrin ketone	0.476		0.0100	ug/L	0.500	ND	95.1	70-130	1.80	30
Surrogate: DCB			*2.45*	*ug/L*	*2.50*		*97.8*	*40-130*		

Quality Control Data
(Continued)

Volatiles

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0488 - W VOC										
Blank (BBA0488-BLK1)					Prepared & Analyzed: 1/19/2021					
Acetone	ND		2.50	ug/L						
Acetone	ND		2.50	ug/L						
Acrolein	ND		2.50	ug/L						
Acrolein	ND		2.50	ug/L						
Acrylonitrile	ND		2.50	ug/L						
Acrylonitrile	ND		2.50	ug/L						
Benzene	ND		0.200	ug/L						
Benzene	ND		0.200	ug/L						
Bromochloromethane	ND		0.500	ug/L						
Bromochloromethane	ND		0.500	ug/L						
Bromodichloromethane	ND		0.200	ug/L						
Bromodichloromethane	ND		0.200	ug/L						
Bromoform	ND		0.500	ug/L						
Bromoform	ND		0.500	ug/L						
Bromomethane	ND		0.500	ug/L						
Bromomethane	ND		0.500	ug/L						
Methyl ethyl ketone (MEK)	ND		2.50	ug/L						
Methyl ethyl ketone (MEK)	ND		2.50	ug/L						
Carbon disulfide	ND		2.50	ug/L						
Carbon disulfide	ND		2.50	ug/L						
Carbon Tetrachloride	ND		0.200	ug/L						

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Quality Control Data
(Continued)

Volatiles (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0488 - W VOC (Continued)										
Blank (BBA0488-BLK1)					Prepared & Analyzed: 1/19/2021					
Carbon Tetrachloride	ND		0.200	ug/L						
Chlorobenzene (Monochlorobenzene)	ND		0.500	ug/L						
Chlorobenzene (Monochlorobenzene)	ND		0.500	ug/L						
Chloroethane	ND		0.500	ug/L						
Chloroethane	ND		0.500	ug/L						
2-Chloroethyl vinyl ether	ND		2.50	ug/L						
2-Chloroethyl vinyl ether	ND		2.50	ug/L						
Chloroform	ND		0.200	ug/L						
Chloroform	ND		0.200	ug/L						
Chloromethane	ND		0.500	ug/L						
Chloromethane	ND		0.500	ug/L						
cis-1,2-Dichloroethylene	ND		0.500	ug/L						
cis-1,2-Dichloroethylene	ND		0.500	ug/L						
cis-1,3-Dichloropropene	ND		0.200	ug/L						
cis-1,3-Dichloropropene	ND		0.200	ug/L						
DBCP	ND		0.500	ug/L						
DBCP	ND		0.500	ug/L						
EDB	ND		0.200	ug/L						
EDB	ND		0.200	ug/L						
1,2-Dichlorobenzene (ortho-Dichlorobenzene)	ND		0.500	ug/L						
1,2-Dichlorobenzene (ortho-Dichlorobenzene)	ND		0.500	ug/L						
m-Dichlorobenzene	ND		0.500	ug/L						
m-Dichlorobenzene	ND		0.500	ug/L						
1,4-Dichlorobenzene (para-Dichlorobenzene)	ND		0.500	ug/L						
1,4-Dichlorobenzene (para-Dichlorobenzene)	ND		0.500	ug/L						
trans-1-4-Dichloro-2-butene	ND		0.500	ug/L						
trans-1-4-Dichloro-2-butene	ND		0.500	ug/L						
Dichlorodifluoromethane	ND		0.500	ug/L						
Dichlorodifluoromethane	ND		0.500	ug/L						
1,1-Dichloroethane	ND		0.500	ug/L						
1,1-Dichloroethane	ND		0.500	ug/L						
1,2-Dichloroethane	ND		0.500	ug/L						
1,2-Dichloroethane	ND		0.500	ug/L						
1,1-Dichloroethylene	ND		0.500	ug/L						
1,1-Dichloroethylene	ND		0.500	ug/L						
trans-1,2 Dichloroethylene	ND		0.500	ug/L						
trans-1,2 Dichloroethylene	ND		0.500	ug/L						
1,2-Dichloropropane	ND		0.500	ug/L						
1,2-Dichloropropane	ND		0.500	ug/L						
trans-1,3-Dichloropropene	ND		0.200	ug/L						
trans-1,3-Dichloropropene	ND		0.200	ug/L						
Ethylbenzene	ND		0.500	ug/L						
Ethylbenzene	ND		0.500	ug/L						
Hexachlorobutadiene	ND		0.500	ug/L						
Hexachlorobutadiene	ND		0.500	ug/L						
2-hexanone	ND		2.50	ug/L						
2-hexanone	ND		2.50	ug/L						
Iodomethane	ND		0.500	ug/L						
Iodomethane	ND		0.500	ug/L						
Isopropylbenzene	ND		0.500	ug/L						

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Quality Control Data
(Continued)

Volatiles (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0488 - W VOC (Continued)										
Blank (BBA0488-BLK1)					Prepared & Analyzed: 1/19/2021					
Isopropylbenzene	ND		0.500	ug/L						
Methylene Chloride (Dichloromethane)	ND		0.500	ug/L						
Methylene Chloride (Dichloromethane)	ND		0.500	ug/L						
Methyl isobutyl ketone (MIBK)	ND		2.50	ug/L						
Methyl isobutyl ketone (MIBK)	ND		2.50	ug/L						
Naphthalene	ND		0.500	ug/L						
Naphthalene	ND		0.500	ug/L						
Styrene	ND		0.500	ug/L						
Styrene	ND		0.500	ug/L						
1,1,1,2-Tetrachloroethane	ND		0.500	ug/L						
1,1,1,2-Tetrachloroethane	ND		0.500	ug/L						
1,1,2,2-Tetrachloroethane	ND		0.500	ug/L						
1,1,2,2-Tetrachloroethane	ND		0.500	ug/L						
Tetrachloroethylene	ND		0.500	ug/L						
Tetrachloroethylene	ND		0.500	ug/L						
Toluene	ND		0.500	ug/L						
Toluene	ND		0.500	ug/L						
1,2,4-Trichlorobenzene	ND		0.500	ug/L						
1,2,4-Trichlorobenzene	ND		0.500	ug/L						
1,1,1-Trichloroethane	ND		0.500	ug/L						
1,1,1-Trichloroethane	ND		0.500	ug/L						
1,1,2-Trichlorethane	ND		0.500	ug/L						
1,1,2-Trichlorethane	ND		0.500	ug/L						
Trichloroethene	ND		0.500	ug/L						
Trichloroethene	ND		0.500	ug/L						
1,2,3-Trichloropropane	ND		0.500	ug/L						
1,2,3-Trichloropropane	ND		0.500	ug/L						
Vinyl acetate	ND		0.500	ug/L						
Vinyl acetate	ND		0.500	ug/L						
Vinyl Chloride	ND		0.200	ug/L						
Vinyl Chloride	ND		0.200	ug/L						
m/p Xylenes (MCL for total)	ND		0.500	ug/L						
m/p Xylenes (MCL for total)	ND		0.500	ug/L						
o-Xylene (MCL for total)	ND		0.500	ug/L						
o-Xylene (MCL for total)	ND		0.500	ug/L						
Total Xylenes	ND		0.500	ug/L						
Total Xylenes	ND		0.500	ug/L						
1,1-Dichloropropene	ND		0.500	ug/L						
1,1-Dichloropropene	ND		0.500	ug/L						
1,2,3-Trichlorobenzene	ND		0.500	ug/L						
1,2,3-Trichlorobenzene	ND		0.500	ug/L						
1,2,4-Trimethylbenzene	ND		0.500	ug/L						
1,2,4-Trimethylbenzene	ND		0.500	ug/L						
1,3,5-Trimethylbenzene	ND		0.500	ug/L						
1,3,5-Trimethylbenzene	ND		0.500	ug/L						
1,3-Dichloropropane	ND		0.500	ug/L						
1,3-Dichloropropane	ND		0.500	ug/L						
2,2-Dichloropropane	ND		0.500	ug/L						
2,2-Dichloropropane	ND		0.500	ug/L						
o-Chlorotoluene	ND		0.500	ug/L						

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Quality Control Data
(Continued)

Volatiles (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0488 - W VOC (Continued)										
Blank (BBA0488-BLK1)					Prepared & Analyzed: 1/19/2021					
o-Chlorotoluene	ND		0.500	ug/L						
p-Chlorotoluene	ND		0.500	ug/L						
p-Chlorotoluene	ND		0.500	ug/L						
Bromobenzene	ND		0.500	ug/L						
Bromobenzene	ND		0.500	ug/L						
Dibromochloromethane	ND		0.500	ug/L						
Dibromochloromethane	ND		0.500	ug/L						
Dibromomethane	ND		0.500	ug/L						
Dibromomethane	ND		0.500	ug/L						
methyl-t-butyl ether (MTBE)	ND		0.500	ug/L						
methyl-t-butyl ether (MTBE)	ND		0.500	ug/L						
n-Butylbenzene	ND		0.500	ug/L						
n-Butylbenzene	ND		0.500	ug/L						
n-Propylbenzene	ND		0.500	ug/L						
n-Propylbenzene	ND		0.500	ug/L						
p-isopropyltoluene	ND		0.500	ug/L						
p-isopropyltoluene	ND		0.500	ug/L						
sec-Butylbenzene	ND		0.500	ug/L						
sec-Butylbenzene	ND		0.500	ug/L						
tert-Butylbenzene	ND		0.500	ug/L						
tert-Butylbenzene	ND		0.500	ug/L						
Trichloroflouromethane	ND		0.500	ug/L						
Trichloroflouromethane	ND		0.500	ug/L						
Surrogate: Toluene-d8			*4.98*	*ug/L*	*5.00*		*99.6*	*70-130*		
Surrogate: Toluene-d8			*4.98*	*ug/L*	*5.00*		*99.6*	*60-140*		
Surrogate: 4-Bromofluorobenzene			*4.97*	*ug/L*	*5.00*		*99.4*	*70-130*		
Surrogate: 4-Bromofluorobenzene			*4.97*	*ug/L*	*5.00*		*99.4*	*60-140*		
Surrogate: 1,2-Dichlorobenzene-d4			*5.10*	*ug/L*	*5.00*		*102*	*70-130*		
Surrogate: 1,2-Dichlorobenzene-d4			*5.10*	*ug/L*	*5.00*		*102*	*60-140*		

Anatek Labs, Inc.

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Quality Control Data
(Continued)

Volatiles (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0488 - W VOC (Continued)										
LCS (BBA0488-BS1)					Prepared & Analyzed: 1/19/2021					
Benzene	4.26		0.200	ug/L	5.00		85.2	70-130		
Benzene	4.26		0.200	ug/L	5.00		85.2	70-130		
Chlorobenzene (Monochlorobenzene)	4.42		0.500	ug/L	5.00		88.4	70-130		
Chlorobenzene (Monochlorobenzene)	4.42		0.500	ug/L	5.00		88.4	70-130		
Chloroform	4.47		0.200	ug/L	5.00		89.4	70-130		
Chloroform	4.47		0.200	ug/L	5.00		89.4	70-130		
1,1-Dichloroethylene	3.58		0.500	ug/L	5.00		71.6	70-130		
1,1-Dichloroethylene	3.58		0.500	ug/L	5.00		71.6	70-130		
Ethylbenzene	4.06		0.500	ug/L	5.00		81.2	70-130		
Ethylbenzene	4.06		0.500	ug/L	5.00		81.2	70-130		
Tetrachloroethylene	3.86		0.500	ug/L	5.00		77.2	70-130		
Tetrachloroethylene	3.86		0.500	ug/L	5.00		77.2	70-130		
Toluene	4.10		0.500	ug/L	5.00		82.0	70-130		
Toluene	4.10		0.500	ug/L	5.00		82.0	70-130		
Trichloroethene	4.13		0.500	ug/L	5.00		82.6	70-130		
Trichloroethene	4.13		0.500	ug/L	5.00		82.6	70-130		
o-Xylene (MCL for total)	4.42		0.500	ug/L	5.00		88.4	70-130		
o-Xylene (MCL for total)	4.42		0.500	ug/L	5.00		88.4	70-130		
Surrogate: Toluene-d8			*5.00*	*ug/L*	*5.00*		*100*	*70-130*		
Surrogate: Toluene-d8			*5.00*	*ug/L*	*5.00*		*100*	*60-140*		
Surrogate: 4-Bromofluorobenzene			*4.94*	*ug/L*	*5.00*		*98.8*	*70-130*		
Surrogate: 4-Bromofluorobenzene			*4.94*	*ug/L*	*5.00*		*98.8*	*60-140*		
Surrogate: 1,2-Dichlorobenzene-d4			*5.00*	*ug/L*	*5.00*		*100*	*70-130*		
Surrogate: 1,2-Dichlorobenzene-d4			*5.00*	*ug/L*	*5.00*		*100*	*60-140*		

WBA0332

Due: 01/26/21

Anatek Labs, Inc.

Chain of Custody Record

1282 Alturas Drive, Moscow ID 83843 (208) 883-2839 FAX 882-9246
504 E Sprague Ste D, Spokane WA 99202 (509) 838-3999 FAX 838-4433

Anatek Log-In #

Turn A

Company Name: Inland Empire Paper Co.	Project Manager: Ben Carleton
Address: 3320 N. Argonne Rd	Project Name & #: NPDES Form 2C
City: Millwood State: WA Zip: 99212	Email Address: bencarleton@iepco.com
Phone: (509) 924-1911	Purchase Order #: 410
Fax:	Sampler Name & phone:

Please refer to our normal turn around times at:
http://www.anateklabs.com/services/guidelines/reporting.asp

X Normal __Next Day* __2nd Day* __Other*_____ *All rush order requests must be prior approved. __Phone __Mail __Fax __Email

Provide Sample Description / List Analyses Requested

Lab ID	Sample Identification	Sampling Date/Time	Matrix	# of Containers	Sample Volume	Preservative: Form 2C
	IEP Comp.	1/11/21 7:15a	water	10		

Note Special Instructions/Comments

Form 2C analyses for NPDES permit application. Appendix A attached.

Inspection Checklist

Received Intact?	(Y)	N
Labels & Chains Agree?	Y	N
Containers Sealed?	(Y)	N
VOC Head Space?	Y	N
Cooler?	(Y)	N
Ice/Ice Packs Present?	(Y)	N

Temperature (°C): 5.9/5.7° IR#1
Preservative: HCl 200385722 H2SO4 200288322 NaOH 2000457
Date & Time: 13:54 1/12/21
Inspected By:

	Printed Name	Signature	Company	Date	Time
Relinquished by	Ben Carleton		IEP	1/12	12:30p
Received by	KSuff		Anatek	1/12/21	1230
Relinquished by					
Received by					
Relinquished by					
Received by					

Samples submitted to Anatek Labs may be subcontacted to other accredited labs if necessary. This message serves as notice of this possibility. Subcontracted analyses will be clearly noted on the analytical report.

CERES Analytical Laboratory, Inc.
4919 Windplay Dr. Suite 1, El Dorado Hills, CA 95762

February 2, 2021 Ceres ID: 14122

Anatek Labs, Inc.
1282 Alturas Drive
Moscow, ID 83843

The following report contains the results for the one waste water sample received on January 25, 2021. This sample was analyzed for 2,3,7,8-TCDD by EPA method 1613B. Routine turn-around time was provided for this work.

This work was authorized under your Work Order # WBA0332.

Continuing Calibration Verification (CCV) Requirements
All associated calibration verification standard(s) (CCV) met the acceptance criteria.

The report consists of a Cover Letter, Sample Inventory (Section I), Data Summary (Section II), Sample Tracking (Section VI), and Qualifiers/Abbreviations (Section VII). Raw Data (Section III), Continuing Calibration (Section IV), and Initial Calibration (Section V) are available in a full report (.pdf format) upon request.

If you have any questions regarding this report, please feel free to contact me at (916)932-5011.

Sincerely,

James M. Hedin
Director of Operations/CEO
jhedin@ceres-lab.com

Section I: Sample Inventory

Ceres Sample ID:	Sample ID	Date Received	Collection Date	&Time
14122-001	IEP Comp. WBA0332-01	1/25/2021	1/11/2021	7:15

Section II: Data Summary

CERES Analytical Laboratory, Inc.
4919 Windplay Dr. Suite 1, El Dorado Hills, CA 95762

EPA Method 1613B

Quality Assurance Sample **Method Blank**	**QC Batch #:** 2326	**Date Received:** NA
	Matrix: Aqueous	**Date Extracted:** 1/28/2021
Project ID: WBA0332	**Sample Size:** 1.000 L	**ZB-5MS Analysis:** 1/29/2021

Analyte	Conc. (pg/L)	MDL	RL	Qual.	Labeled Standards	% R	LCL-UCL (a)	Qualifiers
2,3,7,8-TCDD	DL= 1.32	0.772	5.00		13C-2378-TCDD	84.5	31-137	
					CRS			
					37Cl4-2378-TCDD	87.0	35-197	

DL - Signifies Non-Detect (ND) at sample specific detection limit.
EMPC - Estimated Maximum Possible Concentration due to ion abundance ratio failure.
(a) - Lower control limit - Upper control limit

Analyst: JMH **Reviewed by: BS**

CERES Analytical Laboratory, Inc.
4919 Windplay Dr. Suite 1, El Dorado Hills, CA 95762

EPA Method 1613B

Quality Assurance Sample **Ongoing Precision and Recovery**		**Date Received:** NA
	QC Batch #: 2326	**Date Extracted:** 1/28/2021
	Matrix: Aqueous	**ZB-5MS Analysis:** 1/29/2021
Project ID: WBA0332	**Sample Size:** 1.000 L	

Analyte	Conc. (ng/mL)	Limits (a)	Labeled Standards	% Rec.	Limits (a)
2,3,7,8-TCDD	9.34	7.3-14.6	13C-2378-TCDD	85.9	25-141
			CRS		
			37Cl4-2378-TCDD	96.2	37-158

(a) Limits based on method acceptance criteria.

Analyst: JMH **Reviewed by: BS**

CERES Analytical Laboratory, Inc.
4919 Windplay Dr. Suite 1, El Dorado Hills, CA 95762

EPA Method 1613B

Client Sample ID: IEP Comp. WBA0332-01		
Project ID: WBA0332	**Ceres Sample ID:** 14122-001	**Date Received:** 1/25/2021
	QC Batch #: 2326	**Date Extracted:** 1/28/2021
Date Collected: 1/11/2021	**Matrix:** Aqueous	**ZB-5MS Analysis:** 1/29/2021
Time Collected: 7:15	**Sample Size:** 0.916 L	

Analyte	Conc. (pg/L)	MDL	RL	Qual.	Labeled Standards	% R	LCL-UCL (a)	Qualifiers
2,3,7,8-TCDD	DL= 1.38	0.772	5.46		13C-2378-TCDD	72.1	31-137	
					CRS			
					37Cl4-2378-TCDD	101	42-164	

DL - Signifies Non-Detect (ND) at sample specific detection limit.
EMPC - Estimated Maximum Possible Concentration due to ion abundance ratio failure.
(a) - Lower control limit - Upper control limit

Analyst: JMH **Reviewed by: BS**

Section VI: Sample Tracking

SUBCONTRACT ORDER

Anatek Labs, Inc.

1282 Alturas Drive - Moscow, ID 83843 - (208) 8832839 - Fax (208) 8829246 - email moscow@anateklabs.com
504 E Sprague Ste. D - Spokane, WA 99202 - (509) 838-3999 - fax (509) 838-4433 - email spokane@anateklabs.com

Sending Laboratory:

Anatek Labs, Inc.- Spokane
504 E Sprague Ave, Suite D
Spokane, WA 99202
Phone: 509-838-3999
Fax: 509-838-4433

Project Manager: Kathleen Sattler
kathy@anateklabs.com

Subcontracted Laboratory:

Ceres Analytical Lab
4919 Windplay Dr., Ste. 1
El Dorado Hills, CA 98762
Phone: (916) 932-5011
Fax:

Work Order: WBA0332

Analysis	Due	Expires	Comments
Lab Sample ID: WBA0332-01 ***Water*** ***Sampled: 01/11/2021 07:15***			
Client Sample Name: IEP Comp.			
Dioxin	01/22/2021	01/25/2021 07:15	
Containers Supplied:			

Released By _____ Date _____ Received By _____ Date 1/25/21 10:00

Sample Receipt Check List Logged by: JF (initials)

Ceres ID: 14122	Date/Time: 1/25/21 1050hrs
Client Project ID: WBAQ332	Received Temp: 6.0 °C Acceptable: (Y) / N
Chain of Custody Relinquished by signed?	Y / (N)
Chain of Custody Received by signed?	(Y) / N
Custody Seals? Present?	Y / N
Intact?	Y / N
NA:	(NA)
Unlabeled / Illegible Samples	Y / (N)
Proper Containers:	(Y) / N
Preservation Acceptable (Chemical or Temperature)?	(Y) / N
Drinking Water, Sodium Thiosulfate present?	Y / (N) / NA
Residual Cl?	Y / (N)
Aqueous sample pH: 7	
List COC discrepancies: JF 1/25/21	
List Damaged Samples: JF 1/25/21	

Section VII: Qualifiers/Abbreviations

J	Concentration found below the lower quantitation limit but greater than zero.
B	Analyte present in the associated Method Blank.
E	Concentration found exceeds the Calibration range of the HRGC/HRMS.
D	This analyte concentration was calculated from a dilution.
X	The concentration found is the estimated maximum possible concentration due to chlorinated diphenyl ethers present in the sample.
H	Recovery limits exceeded. See cover letter.
*****	Results taken from dilution.
I	Interference. See cover letter.
Conc.	Concentration Found
DL	Calculated Detection Limit
ND	Non-Detect
% Rec.	Percent Recovery

One Government Gulch - PO Box 929
Kellogg, ID 83837-0929
(208) 784-1258
www.svl.net

Anatek Labs (WA)
504 E Sprague #D
Spokane, WA 99202

Work Order: **X1A0179**
Reported: 28-Jan-21 12:29

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received	Notes
IEP COMP.	X1A0179-01	Water	11-Jan-21 07:15	15-Jan-2021	Q24

Solid samples are analyzed on an as-received, wet-weight basis, unless otherwise requested. Non-Detects are reported at the MDL.
Sample preparation is defined by the client as per their Data Quality Objectives.
This report supercedes any previous reports for this Work Order. The complete report includes pages for each sample, a full QC report, and a notes section.
Analyses were performed in accordance with SVL standard operating procedures and calibrations were performed and met SVL internal QC criteria.
The results presented in this report relate only to the samples, and meet all requirements of the NELAC Standards unless otherwise noted.
This report shall not be reproduced except in full, without the written approval of SVL Analytical, Inc.

Case Narrative: X1A0179

The state of origin is not indicated on the COC.

One Government Gulch - PO Box 929
Kellogg, ID 83837-0929
(208) 784-1258
www.svl.net

Anatek Labs (WA)
504 E Sprague #D
Spokane, WA 99202

Work Order: **X1A0179**
Reported: 28-Jan-21 12:29

Client Sample ID: **IEP COMP.**
SVL Sample ID: **X1A0179-01 (Water)**

Sampled: 11-Jan-21 07:15
Received: 15-Jan-21
Sampled By:

Method	Analyte	Result	Units	RL	MDL	Dilution	Batch	Analyst	Analyzed	Notes
Dissolved Classical Chemistry Parameters										
SM 3500 Cr B	Hexavalent Chromium	< 0.0019	mg/L	0.0050	0.0019		X105019	MWD	01/27/21 00:00	U

This data has been reviewed for accuracy and has been authorized for release by the Laboratory Director or designee.

Connor Williams
Project Manager

One Government Gulch - PO Box 929
Kellogg, ID 83837-0929
(208) 784-1258
www.svl.net

Anatek Labs (WA)
504 E Sprague #D
Spokane, WA 99202

Work Order: **X1A0179**
Reported: 28-Jan-21 12:29

Quality Control - BLANK Data

Method	Analyte	Units	Result	MDL	MRL	Batch ID	Analyzed	Notes
Dissolved Classical Chemistry Parameters								
SM 3500 Cr B	Hexavalent Chromium	mg/L	<0.0019	0.0019	0.0050	X105019	27-Jan-21	

Quality Control - LABORATORY CONTROL SAMPLE Data

Method	Analyte	Units	LCS Result	LCS True	% Rec.	Acceptance Limits	Batch ID	Analyzed	Notes
Dissolved Classical Chemistry Parameters									
SM 3500 Cr B	Hexavalent Chromium	mg/L	0.0191	0.0200	95.7	80 - 120	X105019	27-Jan-21	

Quality Control - MATRIX SPIKE Data

Method	Analyte	Units	Spike Result	Sample Result (R)	Spike Level (S)	% Rec.	Acceptance Limits	Batch and Source ID	Analyzed	Notes
Dissolved Classical Chemistry Parameters										
SM 3500 Cr B	Hexavalent Chromium	mg/L	0.0218	<0.0019	0.0200	109	75 - 125	X105019 - X1A0179-01	27-Jan-21	

Quality Control - MATRIX SPIKE DUPLICATE Data

Method	Analyte	Units	MSD Result	Spike Result	Spike Level	RPD	RPD Limit	% Recovery	Batch and Source ID	Notes
Dissolved Classical Chemistry Parameters										
SM 3500 Cr B	Hexavalent Chromium	mg/L	0.0215	0.0218	0.0200	1.2	20	108	X105019 - X1A0179-01	

One Government Gulch - PO Box 929
Kellogg, ID 83837-0929
(208) 784-1258
www.svl.net

Anatek Labs (WA)
504 E Sprague #D
Spokane, WA 99202

Work Order: **X1A0179**
Reported: 28-Jan-21 12:29

Notes and Definitions

Q24	COC was not relinquished by the client or an agent of the client.
LCS	Laboratory Control Sample (Blank Spike)
RPD	Relative Percent Difference
UDL	A result is less than the detection limit
0.30R>S	% recovery not applicable; spike level is less than 30% of the sample concentration
<RL	A result is less than the reporting limit
MRL	Method Reporting Limit
MDL	Method Detection Limit
N/A	Not Applicable

CERES Analytical Laboratory, Inc.
4919 Windplay Dr. Suite 1, El Dorado Hills, CA 95762

February 2, 2021 Ceres ID: 14122

Anatek Labs, Inc.
1282 Alturas Drive
Moscow, ID 83843

The following report contains the results for the one waste water sample received on January 25, 2021. This sample was analyzed for 2,3,7,8-TCDD by EPA method 1613B. Routine turn-around time was provided for this work.

This work was authorized under your Work Order # WBA0332.

Continuing Calibration Verification (CCV) Requirements
All associated calibration verification standard(s) (CCV) met the acceptance criteria.

The report consists of a Cover Letter, Sample Inventory (Section I), Data Summary (Section II), Sample Tracking (Section VI), and Qualifiers/Abbreviations (Section VII). Raw Data (Section III), Continuing Calibration (Section IV), and Initial Calibration (Section V) are available in a full report (.pdf format) upon request.

If you have any questions regarding this report, please feel free to contact me at (916)932-5011.

Sincerely,

James M. Hedin
Director of Operations/CEO
jhedin@ceres-lab.com

Section I: Sample Inventory

Ceres Sample ID:	Sample ID	Date Received	Collection Date	&Time
14122-001	IEP Comp. WBA0332-01	1/25/2021	1/11/2021	7:15

Section II: Data Summary

CERES Analytical Laboratory, Inc.
4919 Windplay Dr. Suite 1, El Dorado Hills, CA 95762

EPA Method 1613B

Quality Assurance Sample **Method Blank**	**QC Batch #:** 2326	**Date Received:** NA
	Matrix: Aqueous	**Date Extracted:** 1/28/2021
Project ID: WBA0332	**Sample Size:** 1.000 L	**ZB-5MS Analysis:** 1/29/2021

Analyte	Conc. (pg/L)	MDL	RL	Qual.	Labeled Standards	% R	LCL-UCL (a)	Qualifiers
2,3,7,8-TCDD	DL= 1.32	0.772	5.00		13C-2378-TCDD	84.5	31-137	
					CRS			
					37Cl4-2378-TCDD	87.0	35-197	

DL - Signifies Non-Detect (ND) at sample specific detection limit.
EMPC - Estimated Maximum Possible Concentration due to ion abundance ratio failure.
(a) - Lower control limit - Upper control limit

Analyst: JMH **Reviewed by: BS**

CERES Analytical Laboratory, Inc.
4919 Windplay Dr. Suite 1, El Dorado Hills, CA 95762

EPA Method 1613B

Quality Assurance Sample **Ongoing Precision and Recovery**		**Date Received:** NA
	QC Batch #: 2326	**Date Extracted:** 1/28/2021
	Matrix: Aqueous	**ZB-5MS Analysis:** 1/29/2021
Project ID: WBA0332	**Sample Size:** 1.000 L	

Analyte	Conc. (ng/mL)	Limits (a)	Labeled Standards	% Rec.	Limits (a)
2,3,7,8-TCDD	9.34	7.3-14.6	13C-2378-TCDD	85.9	25-141
			CRS		
			37Cl4-2378-TCDD	96.2	37-158

(a) Limits based on method acceptance criteria.

Analyst: JMH **Reviewed by: BS**

CERES Analytical Laboratory, Inc.
4919 Windplay Dr. Suite 1, El Dorado Hills, CA 95762

EPA Method 1613B

Client Sample ID: IEP Comp. WBA0332-01		
Project ID: WBA0332	**Ceres Sample ID:** 14122-001	**Date Received:** 1/25/2021
	QC Batch #: 2326	**Date Extracted:** 1/28/2021
Date Collected: 1/11/2021	**Matrix:** Aqueous	**ZB-5MS Analysis:** 1/29/2021
Time Collected: 7:15	**Sample Size:** 0.916 L	

Analyte	Conc. (pg/L)	MDL	RL	Qual.	Labeled Standards	% R	LCL-UCL (a)	Qualifiers
2,3,7,8-TCDD	DL= 1.38	0.772	5.46		13C-2378-TCDD	72.1	31-137	
					CRS			
					37Cl4-2378-TCDD	101	42-164	

DL - Signifies Non-Detect (ND) at sample specific detection limit.
EMPC - Estimated Maximum Possible Concentration due to ion abundance ratio failure.
(a) - Lower control limit - Upper control limit

Analyst: JMH **Reviewed by: BS**

Section VI: Sample Tracking

SUBCONTRACT ORDER

Anatek Labs, Inc.

1282 Alturas Drive - Moscow, ID 83843 - (208) 8832839 - Fax (208) 8829246 - email moscow@anateklabs.com
504 E Sprague Ste. D - Spokane, WA 99202 - (509) 838-3999 - fax (509) 838-4433 - email spokane@anateklabs.com

Sending Laboratory:

Anatek Labs, Inc.- Spokane
504 E Sprague Ave, Suite D
Spokane, WA 99202
Phone: 509-838-3999
Fax: 509-838-4433

Project Manager: Kathleen Sattler
kathy@anateklabs.com

Subcontracted Laboratory:

Ceres Analytical Lab
4919 Windplay Dr., Ste. 1
El Dorado Hills, CA 98762
Phone: (916) 932-5011
Fax:

Work Order: WBA0332

Analysis	Due	Expires	Comments
Lab Sample ID: WBA0332-01 ***Water*** ***Sampled: 01/11/2021 07:15***			
Client Sample Name: IEP Comp.			
Dioxin	01/22/2021	01/25/2021 07:15	
Containers Supplied:			

Released By _____ Date _____ Received By _____ Date 1/25/21 10:00

Sample Receipt Check List Logged by: JF (initials)

Ceres ID: 14122	Date/Time: 1/25/21 1050hrs
Client Project ID: WBAQ332	Received Temp: 6.0 °C Acceptable: (Y) / N
Chain of Custody Relinquished by signed?	Y / (N)
Chain of Custody Received by signed?	(Y) / N
Custody Seals? Present?	Y / N
Intact?	Y / N
NA:	(NA)
Unlabeled / Illegible Samples	Y / (N)
Proper Containers:	(Y) / N
Preservation Acceptable (Chemical or Temperature)?	(Y) / N
Drinking Water, Sodium Thiosulfate present?	Y / (N) / NA
Residual Cl?	Y / (N)
Aqueous sample pH: 7	

List COC discrepancies:

JF 1/25/21

List Damaged Samples:

JF 1/25/21

Section VII: Qualifiers/Abbreviations

J	Concentration found below the lower quantitation limit but greater than zero.
B	Analyte present in the associated Method Blank.
E	Concentration found exceeds the Calibration range of the HRGC/HRMS.
D	This analyte concentration was calculated from a dilution.
X	The concentration found is the estimated maximum possible concentration due to chlorinated diphenyl ethers present in the sample.
H	Recovery limits exceeded. See cover letter.
*****	Results taken from dilution.
I	Interference. See cover letter.
Conc.	Concentration Found
DL	Calculated Detection Limit
ND	Non-Detect
% Rec.	Percent Recovery

Anatek Labs, Inc.

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504 E Sprague Ste. D - Spokane, WA 99202 - (509) 838-3999 - fax (509) 838-4433 - email spokane@anateklabs.com

Client:	Inland Empire Paper	Work Order:	WBA0473
Address:	3320 N. Argonne Rd.	Project:	NPDES Form 2C
	Spokane, WA 99212	Reported:	2/24/2021 11:56
Attn:	Ben Carleton		

Analytical Results Report

Sample Location:	Comp 1-18		
Lab/Sample Number:	WBA0473-01	Collect Date:	01/19/21 07:00
Date Received:	01/19/21 12:40	Collected By:	
Matrix:	Water		

Analyte	Result	Units	PQL	Analyzed	Analyst	Method	Qualifier
Microbiology							
Fecal Coliform	<1.8	MPN/100mL	1.80	1/20/21 16:36	SAG	SM 9221 E	
Inorganics							
MBAS	0.130	mg/L 342.4MW LAS	0.0500	2/9/21 8:00	TAZ	SM 5540 C	H3
Ammonia/N	0.0243	mg/L	0.0200	1/25/21 12:14	SAG	SM 4500-NH3 H	
Color	250@pH 8.28	Color Units	50.0	1/19/21 15:45	MMS	SM 2120 B	*
Fluoride	ND	mg/L	0.100	1/20/21 15:51	BAS	EPA 300.0	
Total Nitrate/Nitrite	0.306	mg/L	0.100	1/26/21 9:33	SAG	SM 4500-NO3 F	
Sulfate	96.0	mg/L	0.400	1/22/21 17:29	BAS	EPA 300.0	
Sulfide	ND	mg/L	0.100	1/25/21 13:52	BAS	SM 4500-S2 F	*
Sulfite	ND	mg/L	2.00	1/21/21 10:48	BAS	SM 4500-SO3 B	*
TKN	2.83	mg/L	0.500	1/22/21 11:35	SAG	SM 4500-Norg C	
Total Nitrogen	3.14	mg/L	0.600	1/26/21 9:33	SAG	Calculation	*
Total Organic Nitrogen	2.81	mg/L	0.520	1/25/21 12:14	SAG	[CALC]	*
Total P	0.740	mg/L	0.200	1/25/21 15:47	SAG	SM 4500-P H	
Total Residual Chlorine	ND	mg/L	0.0500	1/19/21 14:31	JDP	SM 4500-Cl G	*
Mercury							
Mercury	0.00567	ug/L	0.00500	1/28/21 14:03	BSM	EPA 1631 E	D1
Radiochemistry							
Gross alpha	10.6	pCi/L	3.00	2/22/21 15:14	APM	EPA 900.0	
Gross beta**	12.5	pCi/L	4.00	2/22/21 15:14	APM	EPA 900.0	
Radium 226	<1.00 ± 0.0409	pCi/L	1.00	2/23/21 19:04	APM	EPA 903.0	
Surrogate: Barium Carrier	*93.9%*		*80-120*	*2/24/21 10:40*	*APM*	*EPA 903.0*	
Radium 228	4.13 ± 0.643	pCi/L	1.00	2/17/21 19:52	AM	EPA 904.0	
Surrogate: Barium Carrier	*93.9%*		*80-120*	*2/17/21 19:52*	*AM*	*EPA 904.0*	
Surrogate: Yttrium Carrier	*112%*		*80-120*	*2/17/21 19:52*	*AM*	*EPA 904.0*	
Hydrocarbons							
n-Hexane Extractable Material	14.4	mg/L	4.00	2/2/21 15:53	SAG	EPA 1664B	

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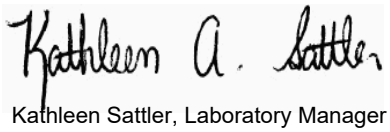
Analytical Results Report

(Continued)

Sample Location:	Hg Field Blank		
Lab/Sample Number:	WBA0473-02	Collect Date:	01/19/21 00:00 - 01/19/21 07:00
Date Received:	01/19/21 12:40	Collected By:	
Matrix:	Water		

Analyte	Result	Units	PQL	Analyzed	Analyst	Method	Qualifier
Mercury							
Mercury	ND	ug/L	0.000500	1/28/21 14:10	BSM	EPA 1631 E	U

Authorized Signature,



Kathleen Sattler, Laboratory Manager

D1	Sample required dilution due to matrix
H3	Sample was received past holding time.
J	The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
U	Compound was analyzed for but not detected
PQL	Practical Quantitation Limit
ND	Not Detected
MCL	EPA's Maximum Contaminant Level
Dry	Sample results reported on a dry weight basis
*	Not a state-certified analyte

RPD	Relative Percent Difference
%REC	Percent Recovery
Source	Sample that was spiked or duplicated.

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The results reported related only to the samples indicated.

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Certifications

Code	Description	Facility	Number
W WA DOE	Washington Department of Ecology	Anatek-Spokane, WA	C585
DOE WA	Washington Department of Ecology	Anatek-Moscow, ID	C595

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Quality Control Data

Microbiology

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0590 - W Multiple Tube										
Blank (BBA0590-BLK1)					Prepared: 1/19/2021 Analyzed: 1/20/2021					
Fecal Coliform	ND		1.80	MPN/100mL						

Quality Control Data

Inorganics

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0499 - W Wet Chem										
Blank (BBA0499-BLK1)					Prepared & Analyzed: 1/19/2021					
Color	<5@pH 7.12		5.00	Color Units						
Duplicate (BBA0499-DUP1)		**Source: WBA0473-01**			Prepared & Analyzed: 1/19/2021					
Color	250@pH 8.34		50.0	Color Units		250@pH 8.28			0.00	50
Batch: BBA0532 - W Ions										
Blank (BBA0532-BLK1)					Prepared & Analyzed: 1/20/2021					
Fluoride	ND		0.100	mg/L						
LCS (BBA0532-BS1)					Prepared & Analyzed: 1/20/2021					
Fluoride	4.10			mg/L	4.00		103	90-110		
Matrix Spike (BBA0532-MS1)		**Source: WBA0422-01**			Prepared & Analyzed: 1/20/2021					
Fluoride	4.02			mg/L	4.00	0.00	101	80-120		
Matrix Spike Dup (BBA0532-MSD1)		**Source: WBA0422-01**			Prepared & Analyzed: 1/20/2021					
Fluoride	4.26			mg/L	4.00	0.00	106	80-120	5.69	20
Batch: BBA0575 - W FIA										
Blank (BBA0575-BLK1)					Prepared: 1/21/2021 Analyzed: 1/22/2021					
TKN	ND		0.500	mg/L						
Blank (BBA0575-BLK2)					Prepared: 1/21/2021 Analyzed: 1/22/2021					
TKN	ND		0.500	mg/L						

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Quality Control Data
(Continued)

Inorganics (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0575 - W FIA (Continued)										
LCS (BBA0575-BS1)					Prepared: 1/21/2021 Analyzed: 1/22/2021					
TKN	2.11		0.500	mg/L	2.00		105	85-115		
Matrix Spike (BBA0575-MS1)		**Source: WBA0525-01**			Prepared: 1/21/2021 Analyzed: 1/22/2021					
TKN	3.50		0.500	mg/L	2.00	1.79	85.4	80-120		
Matrix Spike Dup (BBA0575-MSD1)		**Source: WBA0525-01**			Prepared: 1/21/2021 Analyzed: 1/22/2021					
TKN	3.62		0.500	mg/L	2.00	1.79	91.4	80-120	3.34	20
Batch: BBA0603 - W Ions										
Blank (BBA0603-BLK1)					Prepared & Analyzed: 1/22/2021					
Sulfate	ND		0.100	mg/L						
LCS (BBA0603-BS1)					Prepared & Analyzed: 1/22/2021					
Sulfate	4.13			mg/L	4.00		103	90-110		
Matrix Spike (BBA0603-MS1)		**Source: WBA0473-01**			Prepared & Analyzed: 1/23/2021					
Sulfate	28.6			mg/L	4.00	24.0	115	80-120		
Matrix Spike Dup (BBA0603-MSD1)		**Source: WBA0473-01**			Prepared & Analyzed: 1/23/2021					
Sulfate	28.4			mg/L	4.00	24.0	110	80-120	0.806	20
Batch: BBA0626 - W FIA										
Blank (BBA0626-BLK1)					Prepared & Analyzed: 1/25/2021					
Ammonia/N	ND		0.0200	mg/L						

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Quality Control Data
(Continued)

Inorganics (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0626 - W FIA (Continued)										
Blank (BBA0626-BLK2)					Prepared & Analyzed: 1/25/2021					
Ammonia/N	ND		0.0200	mg/L						
LCS (BBA0626-BS1)					Prepared & Analyzed: 1/25/2021					
Ammonia/N	0.218		0.0200	mg/L	0.200		109	90-110		
Matrix Spike (BBA0626-MS1)		**Source: WBA0500-02**			Prepared & Analyzed: 1/25/2021					
Ammonia/N	0.853		0.0200	mg/L	0.200	0.628	112	80-120		
Matrix Spike Dup (BBA0626-MSD1)		**Source: WBA0500-02**			Prepared & Analyzed: 1/25/2021					
Ammonia/N	0.821		0.0200	mg/L	0.200	0.628	96.6	80-120	3.74	20
Batch: BBA0632 - W FIA										
Blank (BBA0632-BLK1)					Prepared & Analyzed: 1/25/2021					
Total P	ND		0.00500	mg/L						
Blank (BBA0632-BLK2)					Prepared & Analyzed: 1/25/2021					
Total P	ND		0.00500	mg/L						
Blank (BBA0632-BLK3)					Prepared & Analyzed: 1/25/2021					
Total P	ND		0.00500	mg/L						
LCS (BBA0632-BS1)					Prepared & Analyzed: 1/25/2021					
Total P	0.110		0.00500	mg/L	0.100		110	90-110		
LCS (BBA0632-BS2)					Prepared & Analyzed: 1/25/2021					
Total P	0.109		0.00500	mg/L	0.100		109	90-110		

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Quality Control Data
(Continued)

Inorganics (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0632 - W FIA (Continued)										
Matrix Spike (BBA0632-MS1)		**Source: WBA0429-02**			Prepared & Analyzed: 1/25/2021					
Total P	0.365		0.0100	mg/L	0.100	0.251	114	80-120		
Matrix Spike (BBA0632-MS2)		**Source: WBA0601-02**			Prepared & Analyzed: 1/25/2021					
Total P	0.358		0.0100	mg/L	0.100	0.239	118	80-120		
Matrix Spike Dup (BBA0632-MSD1)		**Source: WBA0429-02**			Prepared & Analyzed: 1/25/2021					
Total P	0.365		0.0100	mg/L	0.100	0.251	114	80-120	0.164	20
Matrix Spike Dup (BBA0632-MSD2)		**Source: WBA0601-02**			Prepared & Analyzed: 1/25/2021					
Total P	0.358		0.0100	mg/L	0.100	0.239	118	80-120	0.00	20
Batch: BBA0651 - W FIA										
Blank (BBA0651-BLK1)					Prepared & Analyzed: 1/26/2021					
Total Nitrate/Nitrite	ND		0.100	mg/L						
Blank (BBA0651-BLK2)					Prepared & Analyzed: 1/26/2021					
Total Nitrate/Nitrite	ND		0.100	mg/L						
LCS (BBA0651-BS1)					Prepared & Analyzed: 1/26/2021					
Total Nitrate/Nitrite	0.199		0.100	mg/L	0.201		99.0	90-110		
Matrix Spike (BBA0651-MS1)		**Source: WBA0500-01**			Prepared & Analyzed: 1/26/2021					
Total Nitrate/Nitrite	2.02		0.100	mg/L	0.201	1.84	91.4	80-120		
Matrix Spike Dup (BBA0651-MSD1)		**Source: WBA0500-01**			Prepared & Analyzed: 1/26/2021					
Total Nitrate/Nitrite	2.02		0.100	mg/L	0.201	1.84	91.9	80-120	0.0446	20

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Quality Control Data
(Continued)

Inorganics (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0701 - W Wet Chem										
Blank (BBA0701-BLK1)					Prepared & Analyzed: 1/25/2021					
Sulfide	ND		0.100	mg/L						
LCS (BBA0701-BS1)					Prepared & Analyzed: 1/25/2021					
Sulfide	1.99		0.100	mg/L	2.00		99.5	70-130		
Batch: BBB0207 - Inorganics										
Blank (BBB0207-BLK1)					Prepared: 2/8/2021 Analyzed: 2/9/2021					
MBAS	ND		0.0500	mg/L 342.4MW LAS						
LCS (BBB0207-BS1)					Prepared: 2/8/2021 Analyzed: 2/9/2021					
MBAS	0.182		0.0500	mg/L 342.4MW LAS	0.200		90.9	90-110		

Quality Control Data
(Continued)

Mercury

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0726 - Hg Trace										
Blank (BBA0726-BLK1)					Prepared & Analyzed: 1/28/2021					
Mercury	ND	U	0.000500	ug/L						
LCS (BBA0726-BS1)					Prepared & Analyzed: 1/28/2021					
Mercury	0.00520		0.000500	ug/L	0.00500		104	77-123		
Matrix Spike (BBA0726-MS1)			**Source: MBA0587-01**		Prepared & Analyzed: 1/28/2021					
Mercury	0.00543		0.000500	ug/L	0.00500	0.000288	103	71-125		
Matrix Spike Dup (BBA0726-MSD1)			**Source: MBA0587-01**		Prepared & Analyzed: 1/28/2021					
Mercury	0.00540		0.000500	ug/L	0.00500	0.000288	102	71-125	0.462	24

Quality Control Data
(Continued)

Radiochemistry

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0512 - W Radiochemistry										
Blank (BBA0512-BLK1)					Prepared: 2/18/2021 Analyzed: 2/20/2021					
Gross beta**	ND		4.00	pCi/L						
Gross alpha	ND		3.00	pCi/L						
LCS (BBA0512-BS1)					Prepared: 2/18/2021 Analyzed: 2/20/2021					
Gross beta**	32.5		4.00	pCi/L	30.0		108	50-150		
Gross alpha	17.2		3.00	pCi/L	15.0		115	50-150		
Duplicate (BBA0512-DUP1)			**Source: WBB0347-01**		Prepared: 2/18/2021 Analyzed: 2/20/2021					

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Quality Control Data
(Continued)

Radiochemistry (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0512 - W Radiochemistry (Continued)										
Duplicate (BBA0512-DUP1)		**Source: WBB0347-01**			Prepared: 2/18/2021 Analyzed: 2/20/2021					
Gross alpha	5.43		3.00	pCi/L		ND				30
Gross beta**	ND		4.00	pCi/L		ND				30
Matrix Spike (BBA0512-MS1)		**Source: WBA0347-01**			Prepared: 2/18/2021 Analyzed: 2/20/2021					
Gross beta**	66.8		4.00	pCi/L	30.0	25.7	137	50-150		
Gross alpha	52.5		3.00	pCi/L	15.0	40.9	77.6	50-150		
Matrix Spike Dup (BBA0512-MSD1)		**Source: WBA0347-01**			Prepared: 2/18/2021 Analyzed: 2/20/2021					
Gross beta**	58.2		4.00	pCi/L	30.0	25.7	109	50-150	13.7	30
Gross alpha	62.4		3.00	pCi/L	15.0	40.9	144	50-150	17.2	30
Batch: BBA0514 - W Radiochemistry										
Blank (BBA0514-BLK1)					Prepared: 1/20/2021 Analyzed: 2/8/2021					
Radium 228	ND		1.00	pCi/L						
Surrogate: Barium Carrier			*57.8*	*pCi/L*	*58.8*		*98.3*	*80-120*		
Surrogate: Yttrium Carrier			*23.3*	*pCi/L*	*24.6*		*94.7*	*80-120*		
LCS (BBA0514-BS1)					Prepared: 1/20/2021 Analyzed: 2/8/2021					
Radium 228	5.44		1.00	pCi/L	5.00		109	70-130		
Surrogate: Barium Carrier			*57.4*	*pCi/L*	*58.8*		*97.6*	*80-120*		
Surrogate: Yttrium Carrier			*23.6*	*pCi/L*	*24.6*		*95.9*	*80-120*		
Duplicate (BBA0514-DUP1)		**Source: MBA0257-01**			Prepared: 1/20/2021 Analyzed: 2/8/2021					
Radium 228	3.28		1.00	pCi/L		3.93			18.1	30
Surrogate: Barium Carrier			*55.7*	*pCi/L*	*58.8*		*94.7*	*80-120*		
Surrogate: Yttrium Carrier			*21.8*	*pCi/L*	*24.6*		*88.6*	*80-120*		

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Quality Control Data
(Continued)

Radiochemistry (Continued)

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBA0514 - W Radiochemistry (Continued)										
Matrix Spike (BBA0514-MS1)		**Source: MBA0426-01**			Prepared: 1/20/2021 Analyzed: 2/8/2021					
Radium 228	6.23		1.00	pCi/L	5.00	0.972	105	70-130		
Surrogate: Barium Carrier			*63.6*	*pCi/L*	*58.8*		*108*	*80-120*		
Surrogate: Yttrium Carrier			*22.7*	*pCi/L*	*24.6*		*92.3*	*80-120*		
Matrix Spike Dup (BBA0514-MSD1)		**Source: MBA0426-01**			Prepared: 1/20/2021 Analyzed: 2/8/2021					
Radium 228	6.09		1.00	pCi/L	5.00	0.972	102	70-130	2.22	30
Surrogate: Barium Carrier			*61.2*	*pCi/L*	*58.8*		*104*	*80-120*		
Surrogate: Yttrium Carrier			*21.9*	*pCi/L*	*24.6*		*89.0*	*80-120*		
Batch: BBA0557 - W Radiochemistry										
Blank (BBA0557-BLK1)					Prepared: 2/19/2021 Analyzed: 2/23/2021					
Radium 226	ND		1.00	pCi/L						
Surrogate: Barium Carrier			*57.8*	*pCi/L*	*58.8*		*98.3*	*80-120*		
LCS (BBA0557-BS1)					Prepared: 2/19/2021 Analyzed: 2/24/2021					
Radium 226	4.14		1.00	pCi/L	5.00		82.9	80-120		
Surrogate: Barium Carrier			*57.3*	*pCi/L*	*58.8*		*97.4*	*80-120*		
Duplicate (BBA0557-DUP1)		**Source: MBA0257-01**			Prepared: 2/19/2021 Analyzed: 2/24/2021					
Surrogate: Barium Carrier			*55.7*	*pCi/L*	*58.8*		*94.7*	*80-120*		
Matrix Spike (BBA0557-MS1)		**Source: MBA0426-01**			Prepared: 2/19/2021 Analyzed: 2/24/2021					
Surrogate: Barium Carrier			*63.6*	*pCi/L*	*58.8*		*108*	*80-120*		
Matrix Spike Dup (BBA0557-MSD1)		**Source: MBA0426-01**			Prepared: 2/19/2021 Analyzed: 2/24/2021					
Surrogate: Barium Carrier			*61.0*	*pCi/L*	*58.8*		*104*	*80-120*		

Quality Control Data
(Continued)

Hydrocarbons

Analyte	Result	Qual	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch: BBB0080 - W Filtration										
Blank (BBB0080-BLK1)					Prepared & Analyzed: 2/2/2021					
n-Hexane Extractable Material	ND		1.00	mg/L						
LCS (BBB0080-BS1)					Prepared & Analyzed: 2/2/2021					
n-Hexane Extractable Material	22.4		1.00	mg/L	20.0		112	78-114		

Chain of Custody Record

Anatek Labs, Inc.

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Anatek Log-In #

WBA0473

Due: 02/02/21

Turn Arou

Company Name: Inland Empire Paper Co.	Project Manager: Ben Carleton
Address: 3320 N. Argonne Rd	Project Name & #: NPDES Form 2C
City: Millwood State: WA Zip: 99212	Email Address: ~~bcarleton~~ bencarleton@iepco.com
Phone: (509) 924-1911	Purchase Order #: 410
Fax:	Sampler Name & phone:

Please refer to our normal turn around times at:
http://www.anateklabs.com/services/guidelines/reporting.asp

X Normal
__Next Day*
__2nd Day*
__Other*_____

*All rush order requests must be prior approved.

__Phone
__Mail
__Fax
__Email

Provide Sample Description

List Analyses Requested

Note Special Instructions/Comments

Supp. samples for Form 2C (1st set was 1/11/21) for NPDES permit application

Lab ID	Sample Identification	Sampling Date/Time	Matrix	# of Containers	Sample Volume	Preservative: Form 2C
	Comp 1-18	1/19/21 7:00a	water	14		X

	Printed Name	Signature	Company	Date	Time
Relinquished by	Ben Carleton	Ben Carleton	IEP	1/19	12:40p
Received by	KBell	KBell	ANatek	1/19/21	1240
Relinquished by					
Received by					
Relinquished by					
Received by					

Inspection Checklist

Received Intact?	(Y)	N
Labels & Chains Agree?	(Y)	N
Containers Sealed?	Y	N
VOC Head Space?	(Y)	N
Cooler?	(Y)	N
Ice/Ice Packs Present?	(Y)	N

Temperature (°C): 6.0/5.8 ° IR#1
Preservative: H2SO4 200288322
HCl 200385722 HNO3 200186222
Date & Time: 1501 1/19/21
Inspected By: [signature]
FS027V

Samples submitted to Anatek Labs may be subcontacted to other accredited labs if necessary. This message serves as notice of this possibility. Subcontracted analyses will be clearly noted on the analytical report.

One Government Gulch - PO Box 929
Kellogg, ID 83837-0929
(208) 784-1258
www.svl.net

Anatek Labs (WA)
504 E Sprague #D
Spokane, WA 99202

Work Order: **X1A0282**
Reported: 03-Feb-21 15:47

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received	Notes
WBA0473-01 / COMP 1-18	X1A0282-01	Water	19-Jan-21 07:00	21-Jan-2021	

Solid samples are analyzed on an as-received, wet-weight basis, unless otherwise requested. Non-Detects are reported at the MDL.
Sample preparation is defined by the client as per their Data Quality Objectives.
This report supercedes any previous reports for this Work Order. The complete report includes pages for each sample, a full QC report, and a notes section.
Analyses were performed in accordance with SVL standard operating procedures and calibrations were performed and met SVL internal QC criteria.
The results presented in this report relate only to the samples, and meet all requirements of the NELAC Standards unless otherwise noted.
This report shall not be reproduced except in full, without the written approval of SVL Analytical, Inc.

Case Narrative: X1A0282

The state of origin is not indicated on the COC.

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Anatek Labs (WA)
504 E Sprague #D
Spokane, WA 99202

Work Order: **X1A0282**
Reported: 03-Feb-21 15:47

Client Sample ID: **WBA0473-01 : COMP 1-18**
SVL Sample ID: **X1A0282-01 (Water)**

Sampled: 19-Jan-21 07:00
Received: 21-Jan-21
Sampled By:

Method	Analyte	Result	Units	RL	MDL	Dilution	Batch	Analyst	Analyzed	Notes
Anions by Ion Chromatography										
EPA 300.0	Bromide	< 0.100	mg/L	0.100	0.092		X104219	RS	01/26/21 04:59	

This data has been reviewed for accuracy and has been authorized for release by the Laboratory Director or designee.

Connor Williams
Project Manager

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(208) 784-1258
www.svl.net

Anatek Labs (WA)
504 E Sprague #D
Spokane, WA 99202

Work Order: **X1A0282**
Reported: 03-Feb-21 15:47

Quality Control - BLANK Data

Method	Analyte	Units	Result	MDL	MRL	Batch ID	Analyzed	Notes
Anions by Ion Chromatography								
EPA 300.0	Bromide	mg/L	<0.100	0.092	0.100	X104219	25-Jan-21	

Quality Control - LABORATORY CONTROL SAMPLE Data

Method	Analyte	Units	LCS Result	LCS True	% Rec.	Acceptance Limits	Batch ID	Analyzed	Notes
Anions by Ion Chromatography									
EPA 300.0	Bromide	mg/L	4.31	4.00	108	90 - 110	X104219	25-Jan-21	

Quality Control - MATRIX SPIKE Data

Method	Analyte	Units	Spike Result	Sample Result (R)	Spike Level (S)	% Rec.	Acceptance Limits	Batch and Source ID	Analyzed	Notes
Anions by Ion Chromatography										
EPA 300.0	Bromide	mg/L	4.17	<0.100	4.00	104	90 - 110	X104219 - X1A0273-03	25-Jan-21	
EPA 300.0	Bromide	mg/L	4.05	<0.100	4.00	101	90 - 110	X104219 - X1A0273-04	25-Jan-21	

Quality Control - MATRIX SPIKE DUPLICATE Data

Method	Analyte	Units	MSD Result	Spike Result	Spike Level	RPD	RPD Limit	% Recovery	Batch and Source ID	Notes
Anions by Ion Chromatography										
EPA 300.0	Bromide	mg/L	4.14	4.17	4.00	0.6	20	103	X104219 - X1A0273-03	

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Anatek Labs (WA)
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Spokane, WA 99202

Work Order: **X1A0282**
Reported: 03-Feb-21 15:47

Notes and Definitions

LCS	Laboratory Control Sample (Blank Spike)
RPD	Relative Percent Difference
UDL	A result is less than the detection limit
0.30R>S	% recovery not applicable; spike level is less than 30% of the sample concentration
<RL	A result is less than the reporting limit
MRL	Method Reporting Limit
MDL	Method Detection Limit
N/A	Not Applicable

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Work Order: **X1A0282**
Reported: 03-Feb-21 15:47

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received	Notes
WBA0473-01 / COMP 1-18	X1A0282-01	Water	19-Jan-21 07:00	21-Jan-2021	

Solid samples are analyzed on an as-received, wet-weight basis, unless otherwise requested. Non-Detects are reported at the MDL.
Sample preparation is defined by the client as per their Data Quality Objectives.
This report supercedes any previous reports for this Work Order. The complete report includes pages for each sample, a full QC report, and a notes section.
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The results presented in this report relate only to the samples, and meet all requirements of the NELAC Standards unless otherwise noted.
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Case Narrative: X1A0282

The state of origin is not indicated on the COC.

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Anatek Labs (WA)
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Spokane, WA 99202

Work Order: **X1A0282**
Reported: 03-Feb-21 15:47

Client Sample ID: **WBA0473-01 : COMP 1-18**
SVL Sample ID: **X1A0282-01 (Water)**

Sampled: 19-Jan-21 07:00
Received: 21-Jan-21
Sampled By:

Method	Analyte	Result	Units	RL	MDL	Dilution	Batch	Analyst	Analyzed	Notes
Anions by Ion Chromatography										
EPA 300.0	Bromide	< 0.100	mg/L	0.100	0.092		X104219	RS	01/26/21 04:59	

This data has been reviewed for accuracy and has been authorized for release by the Laboratory Director or designee.

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Project Manager

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Anatek Labs (WA)
504 E Sprague #D
Spokane, WA 99202

Work Order: **X1A0282**
Reported: 03-Feb-21 15:47

Quality Control - BLANK Data

Method	Analyte	Units	Result	MDL	MRL	Batch ID	Analyzed	Notes
Anions by Ion Chromatography								
EPA 300.0	Bromide	mg/L	<0.100	0.092	0.100	X104219	25-Jan-21	

Quality Control - LABORATORY CONTROL SAMPLE Data

Method	Analyte	Units	LCS Result	LCS True	% Rec.	Acceptance Limits	Batch ID	Analyzed	Notes
Anions by Ion Chromatography									
EPA 300.0	Bromide	mg/L	4.31	4.00	108	90 - 110	X104219	25-Jan-21	

Quality Control - MATRIX SPIKE Data

Method	Analyte	Units	Spike Result	Sample Result (R)	Spike Level (S)	% Rec.	Acceptance Limits	Batch and Source ID	Analyzed	Notes
Anions by Ion Chromatography										
EPA 300.0	Bromide	mg/L	4.17	<0.100	4.00	104	90 - 110	X104219 - X1A0273-03	25-Jan-21	
EPA 300.0	Bromide	mg/L	4.05	<0.100	4.00	101	90 - 110	X104219 - X1A0273-04	25-Jan-21	

Quality Control - MATRIX SPIKE DUPLICATE Data

Method	Analyte	Units	MSD Result	Spike Result	Spike Level	RPD	RPD Limit	% Recovery	Batch and Source ID	Notes
Anions by Ion Chromatography										
EPA 300.0	Bromide	mg/L	4.14	4.17	4.00	0.6	20	103	X104219 - X1A0273-03	

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Work Order: **X1A0282**
Reported: 03-Feb-21 15:47

Notes and Definitions

LCS	Laboratory Control Sample (Blank Spike)
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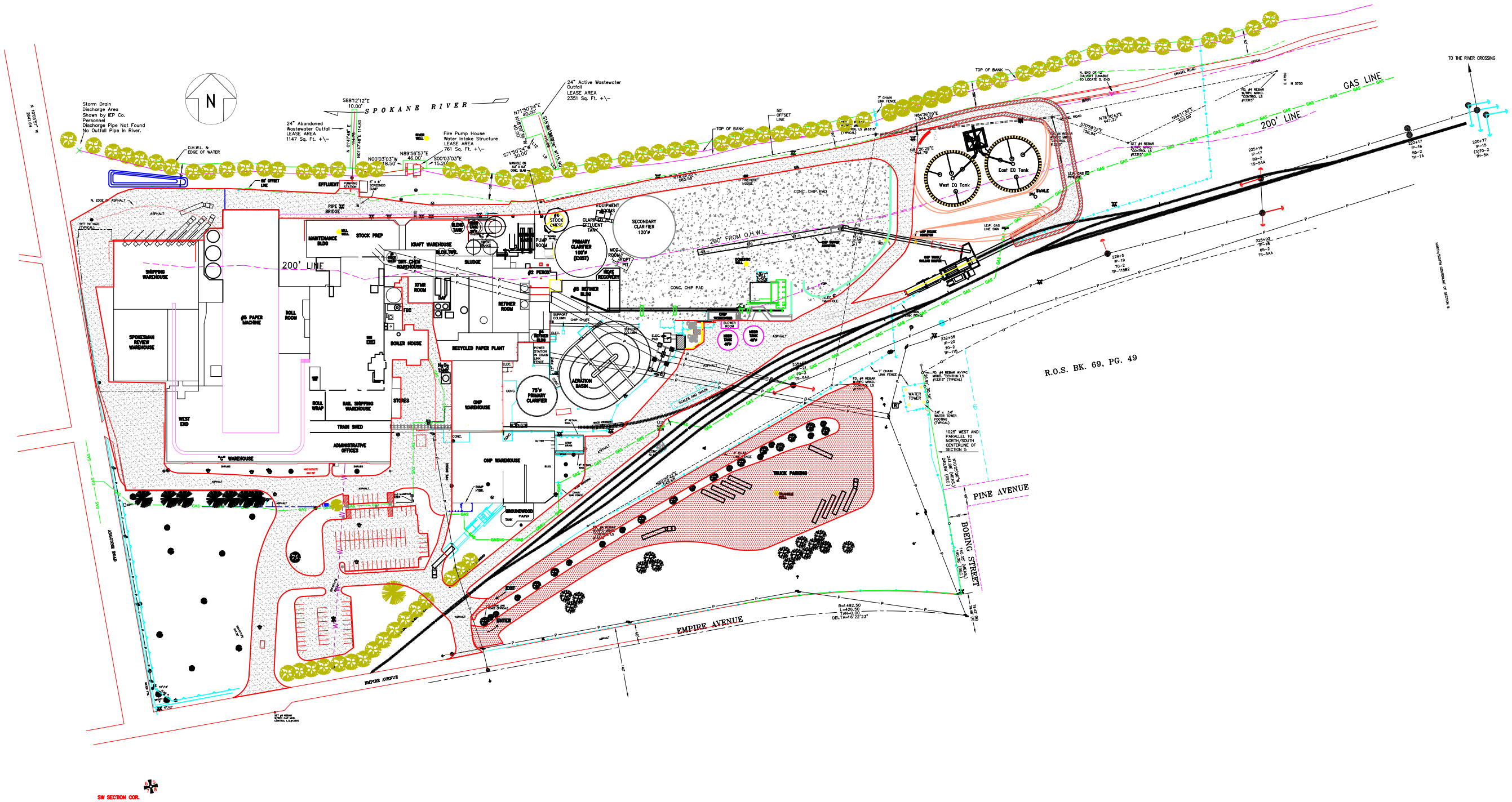
0.30R>S	% recovery not applicable; spike level is less than 30% of the sample concentration
<RL	A result is less than the reporting limit
MRL	Method Reporting Limit
MDL	Method Detection Limit
N/A	Not Applicable

Waiver Request

Inland Empire Paper Company is requesting a waiver for conventional pollutants Chemical Oxygen Demand (COD) and Total Organic Carbon (TOC) in Form 1, Table A for IEP Outfall Number 001. These conventional pollutants are not regulated under IEP's current NPDES Permit No. WA0000825, therefore IEP is not required to monitor for these pollutants and does not have data to support this request.



AutoCAD FILE: 101-003 4:30 PM 05APR2004

DWG. NO.	TITLE	DWG. NO.	TITLE
REFERENCE		REFERENCE	

NO.	DESCRIPTION	BY	DATE
REVISIONS			

NO.	DESCRIPTION	BY	DATE
REVISIONS			

INLAND EMPIRE PAPER COMPANY
MILLWOOD WASHINGTON

SCALE: 1"=100'-0"	DAY	MONTH	YEAR
DRAWN BY: TJE	12	FEB	2021
CHECKED BY:			
APPROVED:			

MILL SITE PLAN

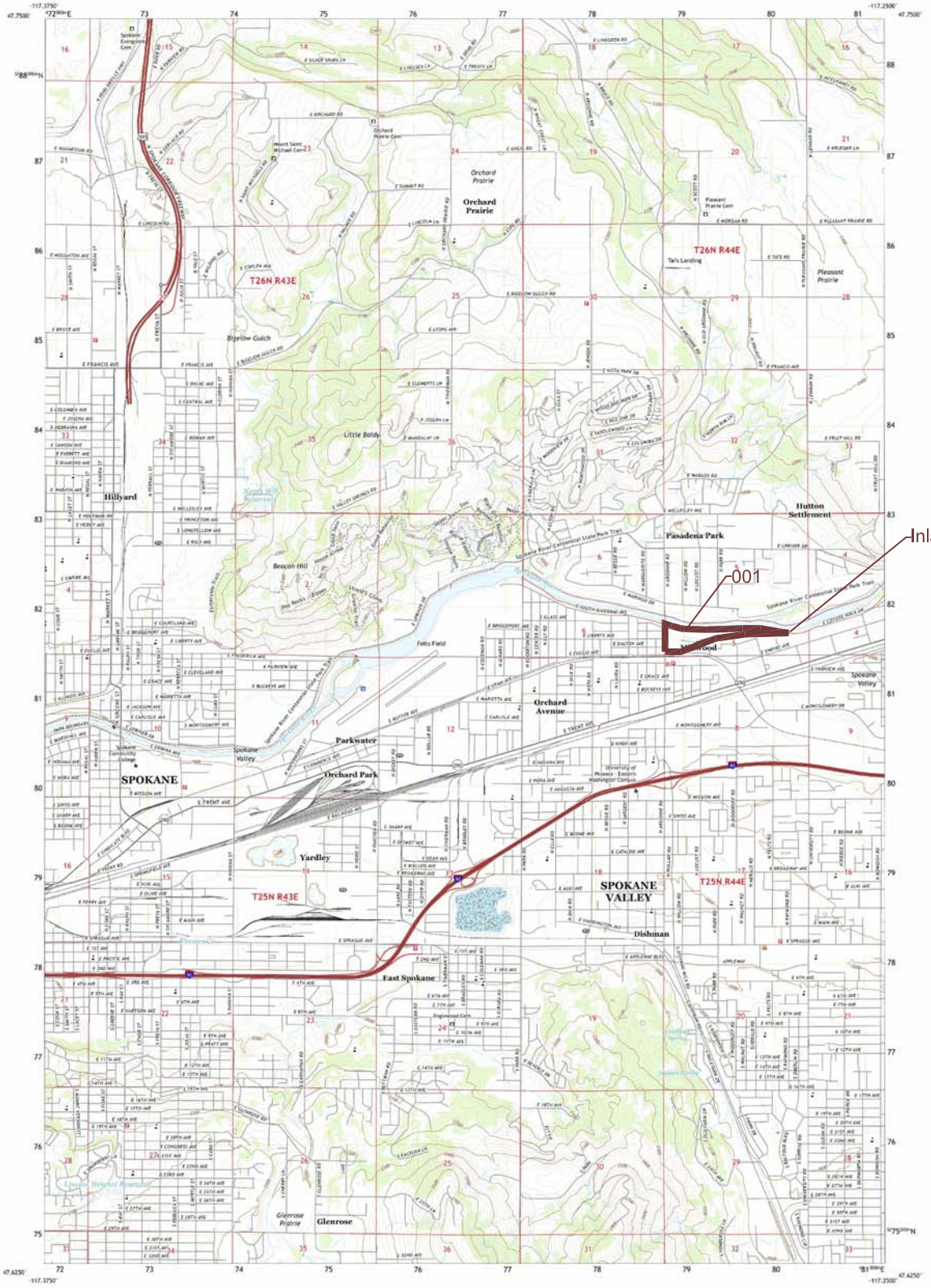
PROJECT NO.	DRAWING NUMBER	REV.
	D101-003	0

USGS science for a changing world

U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY

The National Map US Topo

SPOKANE NE QUADRANGLE
WASHINGTON - SPOKANE COUNTY
7.5-MINUTE SERIES



Produced by the United States Geological Survey
North American Datum of 1983 (NAD83)
World Geodetic System of 1984 (WGS84). Projection and
1 000-meter grid Universal Transverse Mercator, Zone 11T

This map is not a legal document. Boundaries may be generalized for this map scale. Private lands within government reservations may not be shown. Obtain permission before entering private lands.

Imagery	NAIP, July 2015 - January 2016	
Roads	U.S. Census Bureau,	2016
Names	GNIS, 1979 -	2019
Hydrography	National Hydrography Dataset,	2002
Contours	National Elevation Dataset,	2001
Boundaries	Multiple sources; see metadata file	2017 - 2018
Public Land Survey System	BLM,	2019
Wetlands	FWS National Wetlands Inventory	1982

UTM GRID AND 2019 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24 000

KILOMETERS 0 0.5 1 2
METERS 0 500 1000 2000
MILES 0 0.5 1
FEET 0 1000 2000 3000 4000 5000 6000 7000 8000 9000 10000

CONTOUR INTERVAL 20 FEET
NORTH AMERICAN VERTICAL DATUM OF 1988

This map was produced to conform with the National Geospatial Program US Topo Product Standard, 2011. A metadata file associated with this product is draft version 0.6.18

WASHINGTON
QUADRANGLE LOCATION

ADJOINING QUADRANGLES
1 Dartford
2 Mead
3 Foothills
4 Spokane NW
5 Greenacres
6 Spokane SW
7 Spokane SE
8 Freeman

ROAD CLASSIFICATION
Expressway
Secondary Hwy
Ramp
Local Connector
Local Road
4WD
Interstate Route
US Route
State Route

SPOKANE NE, WA
2020

MN - 76 45 16
NGA REF NO. USGS X 24 42 5 44

TRUE NORTH

MILL NORTH

SPOKANE RIVER

208

EFFLUENT PUMPING STATION

SPOKESMAN REVIEW WAREHOUSES

WAREHOUSE

ADMINISTRATIVE BLDG

CHIP STORAGE

208

208

PARKING

ARGONNE ROAD

EMPIRE AVENUE

– STORMWATER RUNOFF DRAINS TO WASTE WATER TREATMENT SYSTEM

– ASPHALTED DRIVEWAY

– ASPHALTED DRIVEWAY RUNOFF DRAINS TO WASTE WATER TREATMENT SYSTEM

208 – SWALE AREA

AutoCAD FILE: 101–104 11:51 AM 19DEC2006

DWG. NO.	TITLE
REFERENCE	

DWG. NO.	TITLE
REFERENCE	

NO.	DESCRIPTION	BY	DATE
REVISIONS			

NO.	DESCRIPTION	BY	DATE
4	ADD ASPHALTED DRIVEWAY RUNOFF TO WW TREATMENT SYS	KMR	19DEC06
3	REMOVED STORMWATER OUTFALL NO. 002	KMR	15AUG02
2	ADD PAVED AREAS	KMR	10APR02
1	ADD 100' CLARIFIER, #5 PM BLDG, PULPING FACILITY	KMR	10DEC01
REVISIONS			

INLAND EMPIRE PAPER COMPANY

MILLWOOD WASHINGTON

SCALE: NONE	DAY	MONTH	YEAR
DRAWN BY: TJE	12	FEB	21
CHECKED BY:			
APPROVED:			

PAPER MILL STORMWATER RUNOFF PLAN

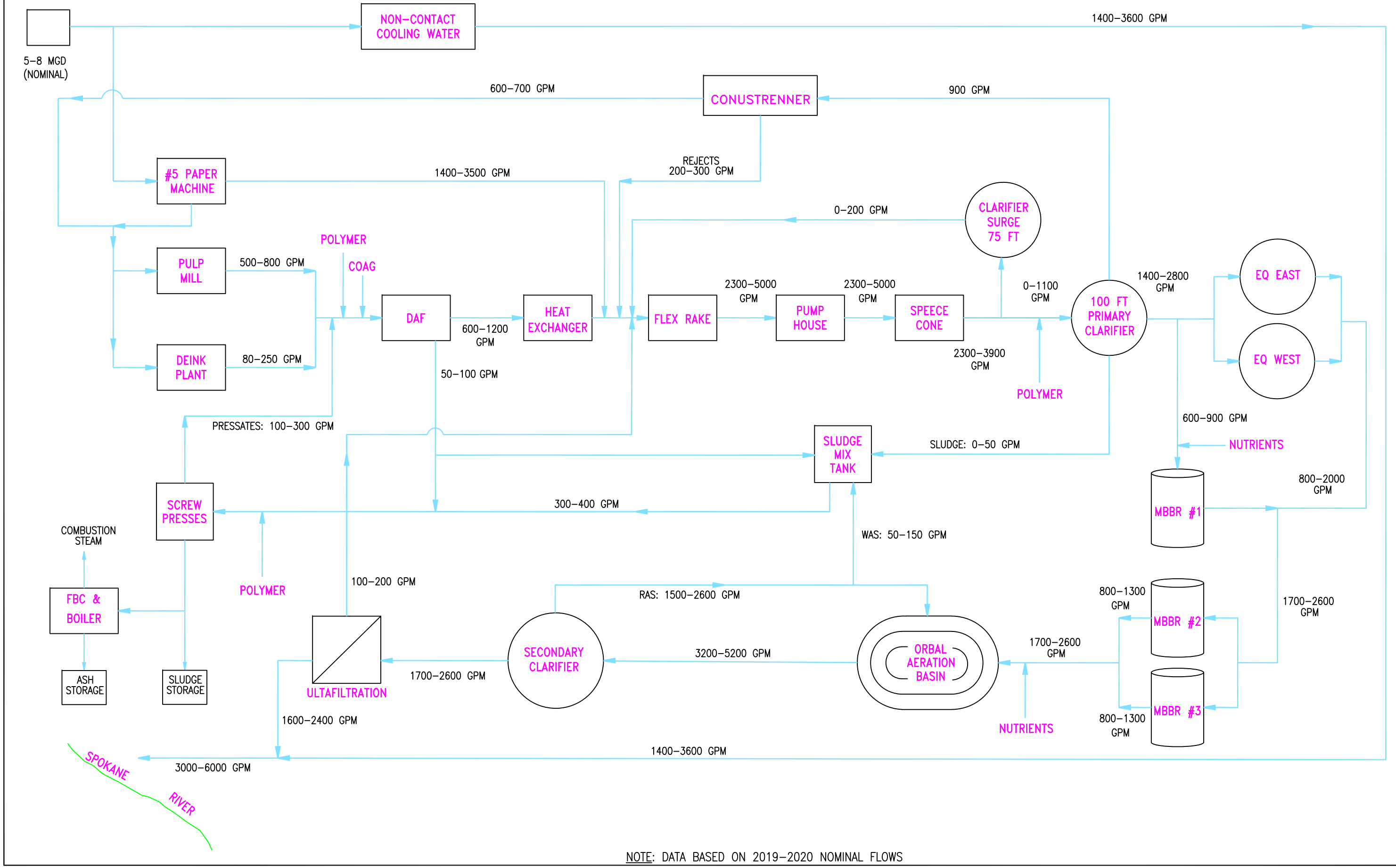
P.O.NUMBER

DRAWING NUMBER D101–104

REV. 4

MILL LINE DIAGRAM & WATER BALANCE

FACILITY: INLAND EMPIRE PAPER COMPANY, SPOKANE, WA



NOTE: DATA BASED ON 2019–2020 NOMINAL FLOWS

AutoCAD FILE: IEP WATER BALANCE 2:03 PM 21DEC2006

From:	Doug Krapas
To:	Hallinan, Patrick J. (ECY); Joy, Shara-Li (ECY)
Cc:	Kevin Rasler; Ben Carleton; James Tupper
Subject:	Application for Renewal of IEP NPDES Permit WA0000825
Date:	Monday, March 1, 2021 2:42:59 PM
Attachments:	Cover Letter_030121.pdf Form 1 for Inland Empire Paper Company_Final & Certified_030121.pdf Form 2C for Inland Empire Paper Company_Final & Certified_030121.pdf Aquatic Toxicology Report (WET) for Winter 2021 Sample.pdf Anatek Labs, Conventional and Non-Conventional Pollutants, Part 1 of 2.pdf Anatek Labs, Conventional and Non-Conventional Pollutants, Part 2 of 2.pdf Waiver Request for COD & TOC.pdf IEP Site Plan.pdf IEP Topographical Location Map.pdf IEP Stormwater Runoff Plan.pdf IEP Water Balance 2-16-21.pdf

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THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM - Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link

Hello Pat – per Ecology's request in a letter to Inland Empire Paper Company (IEP) dated August 24, 2020 attached you will find all requested forms and supporting documents for renewal of IEP's NPDES Permit WA0000825. In addition to this electronic submittal sent directly to you and the Permit Coordinator (stra461@ecy.wa.gov), a hard copy of this submittal is also being sent to you (Water Quality Permit Coordinator) at the Eastern Regional Office as requested in the letter via certified mail service.

Please contact me should you have any questions or require additional information.

Regards,

Doug

Doug Krapas
Environmental Manager

INLAND EMPIRE
PAPER COMPANY
Papermakers since 1911.

3320 N. Argonne Spokane, WA 99212
509.924.1911 509.927.8461 FAX

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