

April 8, 2025

Mr. Michael Smith Land Quality Bureau Iowa Department of Natural Resources 6200 Park Avenue, Suite 200 Des Moines, IA 50321

RE: Metro Park East – Phase II MSWLF Unit and Former CWTS
Permit No. #77-SDP-01-72P
February 2025 Verification Results and Notice of SSI

Dear Mr. Smith,

On behalf of Metro Waste Authority (MWA), HDR Engineering, Inc. (HDR) has prepared this letter to provide the Iowa Department of Natural Resources (IDNR) with laboratory analytical results from the February 24, 2025, verification monitoring event, and a summary of the monitoring program for the next compliance monitoring event at the Metro Park East (MPE) Phase II municipal solid waste landfill (MSWLF) Unit and Former Constructed Wetlands Treatment System (CWTS). Based on the analytical and statistical results from the Fall 2024 semiannual compliance monitoring event, zinc was detected above the upper prediction limit (UPL) at monitoring location GU-3. A verification monitoring event was conducted to evaluate if zinc at GU-3 exceeded the UPL when using the 1-of-2 verification sampling method. The February 2025 verification monitoring event field sampling form and laboratory analytical report are attached. The analytical concentrations of the original and verification samples, are summarized on the table below:

Sample Date	Zinc (mg/L) [GU-3]
Original Sample (October 2024)	<u>3.05</u>
Verification Sample (February 2025)	<u>0.492</u>
Interwell Upper Prediction Limit	0.456

#### Notes:

mg/L = milligrams per liter

**Bold** indicates a concentration that exceeds the interwell upper prediction limit.

The February 2025 verification event zinc concentration collected from groundwater underdrain GU-3 was significantly lower than the concentration measured in the October 2024 compliance event. However, the concentration exceeded the UPL for zinc. Since 2-of-2 sampling events indicate concentrations are above the UPL, a statistically significant increase (SSI) was verified for zinc at GU-3.

Per Iowa Administrative Code (IAC) 567 - 113.10(5)" c"(1), a notice of an SSI finding has been placed in the operating record for the constituent-monitoring location pair as well as a notification submitted to IDNR



indicating the notice was placed in the operating record. This letter serves as notice of the SSI verification for zinc at groundwater underdrain GU-3.

The increase in zinc concentration in the samples collected from groundwater underdrain GU-3 could be related to an alternative source. The alternative source is assumed to be atmospheric and wind-blown sediment entering the sump where the GU-3 groundwater sample is collected. The GU-3 sump is enclosed in a roll-top, plastic storage container to protect it from the elements. During a wind event prior to the Fall 2024 semiannual compliance monitoring event, the roll-top lid was blown off of the storage container and exposing the top of the sump to the elements. It is assumed that dust and sediment infiltrated the sump and potentially impacted the groundwater sample collected from the sump. As indicated on the attached Time Series graph for zinc at GU-3, the October 2024 concentration was the second highest zinc concentration recorded at 3.05 milligrams per liter (mg/L). The highest zinc concentration measured from GU-3 is considered an outlier at a concentration of 11.6 mg/L (July 23, 2020).

During the February 2025 verification monitoring event, the dedicated bailer was replaced with a new, unused bailer prior to sample collection. This was intended to reduce any residual materials that may have collected on the former bailer from influencing the groundwater sample. With the significant reduction in zinc concentration when comparing the February 2025 sample to the October 2024 sample, the new bailer could have contributed to that reduction. In addition, there may still be some residual wind-blown sediment in the sump that hasn't fully flushed out of the system.

During the February 2025 verification monitoring event, the sump lid was evaluated for potential points of entry where wind-blown sediment could enter. The field staff indicated that sediment could have entered through quick-connect and vapor monitoring fittings on the sump lid. It was also discussed that sediment deposited on top of the sump lid could have been inadvertently transferred into the sump or to the groundwater sample containers directly when conducting the sample collection. Based on these assumptions, MWA is planning to replace the plastic storage container enclosing the sump for GU-3. The replacement structure is tentatively scheduled for installation by the end of April 2025. It is recommended that field personnel conducting the sample collection clean off dust or sediment on the top of the sump lid and its fittings prior to opening the sampling access port on the lid and replace nitrile gloves prior to filling sample containers.

To further evaluate this alternative source, MWA plans to conduct additional sampling to verify if elevated zinc is discharging from groundwater underdrain GU-3 into a Water of the United States. During the Spring 2025 semiannual compliance monitoring event, a groundwater sample will be collected from the GU-3 sump and analyzed for zinc and total suspended solids (TSS). In addition, another sample will be collected at the point where GU-3 daylights into the drainage ditch immediately southwest of the sump and analyzed for zinc and TSS. These samples will be evaluated to see if there are differences in sample collection from within the sump versus where the discharge occurs at the ground surface. In addition, the sampling will be conducted in accordance with IDNR's Memorandum of Understanding regarding passive engineered conveyance structures used at landfills for volatilizing organic compounds from underdrain systems, dated August 7, 2012. The guidance allows for a sample to be collected and analyzed at a point



prior to groundwater discharge to a Water of the United States. The point where GU-3 daylights is downgradient of the GU-3 sump, but upgradient of other underdrain discharges and upstream of a water body that is considered a Water of the United States. Pending the results of the additional sampling at GU-3, IDNR will be contacted to discuss maintaining GU-3 as a detection monitoring location or if the underdrain needs to be connected to the site's leachate collection system.

If there are any questions regarding this submittal, please do not hesitate to contact Richard Wilson at (402) 392-6714.

Sincerely,

HDR Engineering, Inc.

**Richard Wilson** 

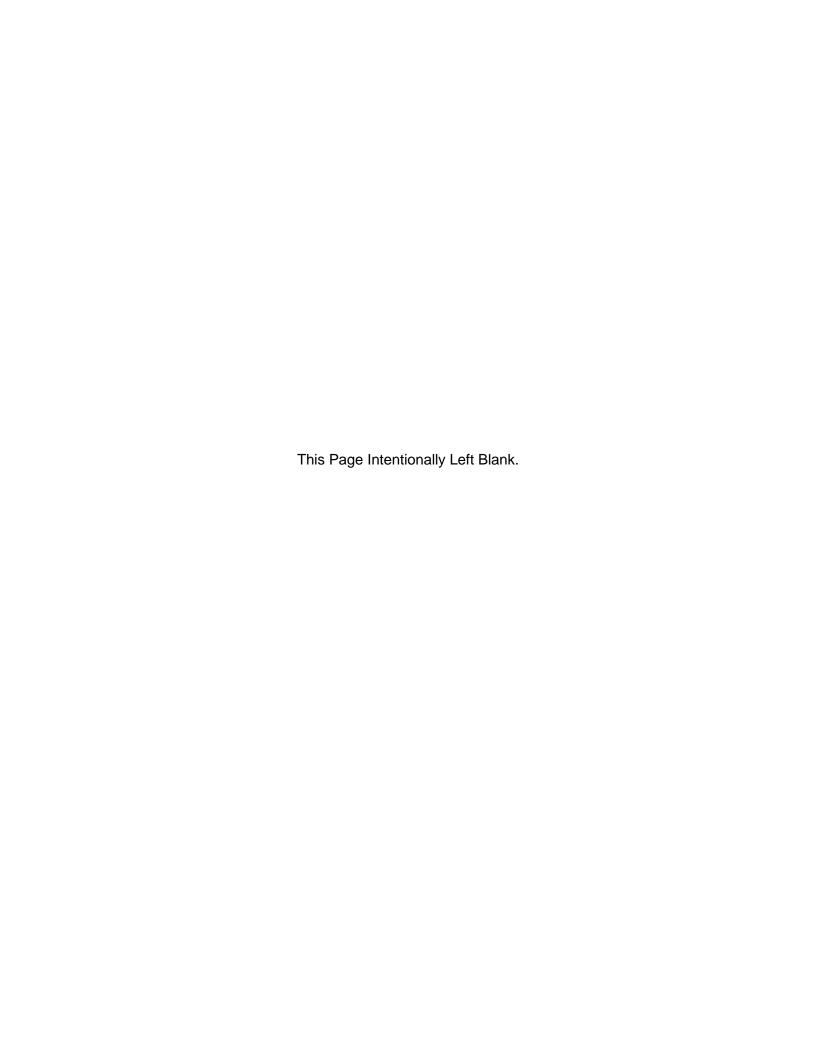
Environmental Project Manager (Solid Waste)

Dan Bacehowski

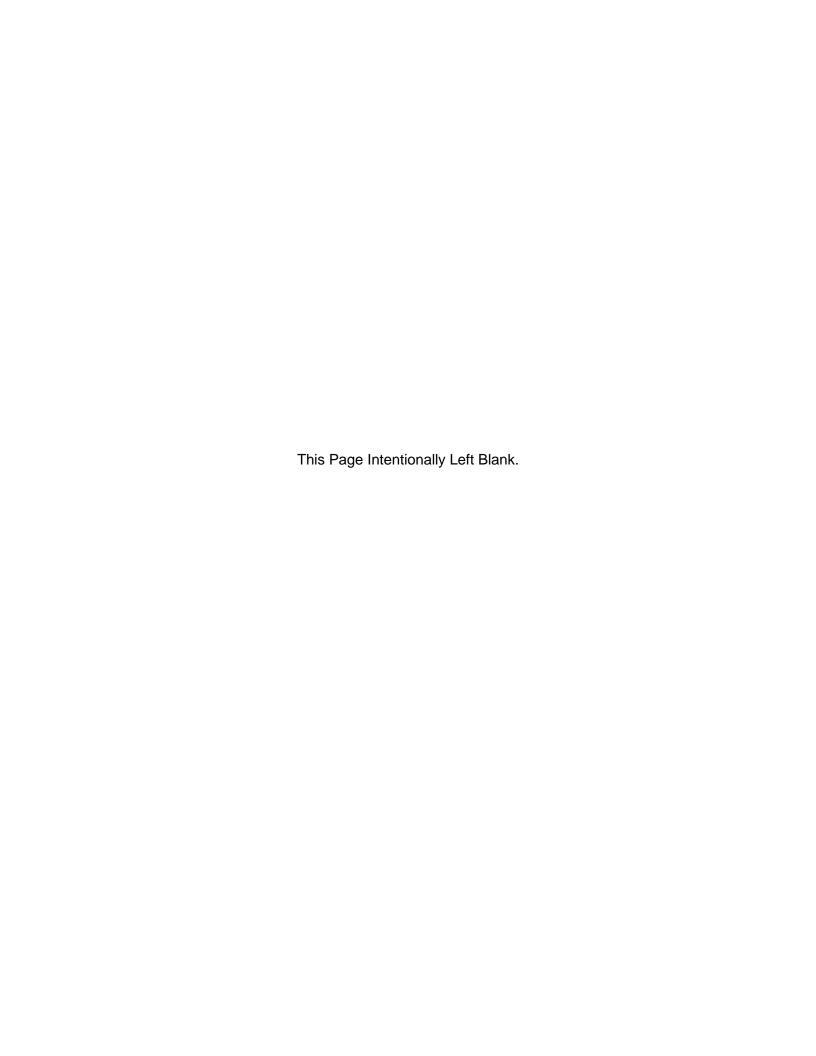
Environmental Practice Lead (Solid Waste)

cc: Mr. Matthew Morris, Metro Waste Authority

Mr. Andrew Phillips, Metro Waste Authority



**Low Stress Groundwater Sampling Data Sheet** Sampler Name(s): Mike Walsh Facility Name: Metro Park East 2/24/75 15:00 Date/Time: MW Identification: 60-3 PID Readings: N/A Sample Number: Lloudy Weather Conditions: Wellhead Inspection: No Visual Inspection: 1. Survey Mark Present: (Yes/No) Yes / 5. Standing/Ponded Water (Yes/No) Yes / NO 6. Frost Heaving (Yes/No) Yes / NO 2. Collision/Vandalism Damage: (Yes/No) Yes NO 3. Casing Degradation: (Yes/No) Yes No 7. Lock in Place (Yes/No) Yes / No 4. Well Subsidence: (Yes/No) Yes / No **Ground Water Measurements/Purge data:** 1. Static Water Level (±0.01 feet [ft.]) 6. Purge Rate (mL/min) 2. Bottom of casing (±0.01 ft.) 7. Water Level Measuring Equip. 8. Purge Equipment Used 3. Casing Diameter (inches) 4. Actual Volume of Water Purged (mL) 9. Dedicated? (Yes/No) Yes / No 5. Purge Water Characteristics: 10. Immiscible layer observed Yes No odent? 11. Thickness of immiscible layer Odor Turbidity AIR / NITROGEN / N/A Color 12. Drive Gas (Air/Nitrogen) ORP Volume Temp Conductivity D.O. Turbidity Time (mV) (mg/L)(NTU) рН Drawdown Purged (mL) (°C) (µs/cm) Time to recharge (min): 9. Decontamination Procedures: Well evacuated to dryness? Yes / No Alconox/DI Rinse 1. Sample Filtered? Yes / No 6. Sample Time: 10. Instrument type: YSI ProDSS 2. Sampling Equip. Used Bailer 7: Parameter/Container/Pres. AIR / NITROGEN / N/A See Attached COC Calibration Date: LAB 3. Drive Gas (Air/Nitrogen) 4. Sample Rate (mL/min) NIA Calibration Time: LAB 5. Sample Appearance: Stnd. Reading Adjust. **Turbidity** Moderate 8. Other Information: рН Color Brown /R Conduct. See attached Lab Form for ORP Odor **Calibration Data** D.O Turbidity



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# **ANALYTICAL REPORT**

# PREPARED FOR

Attn: Richard Wilson HDR Inc 1917 S 67th Street Omaha, Nebraska 68106

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# **JOB DESCRIPTION**

Metro Park EAST-GU-3

# **JOB NUMBER**

310-300844-1

Eurofins Cedar Falls 3019 Venture Way Cedar Falls IA 50613



# **Eurofins Cedar Falls**

### **Job Notes**

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing North Central, LLC Project Manager.

### **Authorization**

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Authorized for release by Conner Calhoun, Client Service Manager Conner.Calhoun@et.eurofinsus.com (319)277-2401

# DD 1D: 310-300644-1

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### **Case Narrative**

Client: HDR Inc Job ID: 310-300844-1

Project: Metro Park EAST-GU-3

**Eurofins Cedar Falls** Job ID: 310-300844-1

#### Job Narrative 310-300844-1

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable.

- Matrix QC may not be reported if insufficient sample is provided or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

#### Receipt

The sample was received on 2/25/2025 4:30 PM. Unless otherwise noted below, the sample arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 0.8°C.

#### Metals

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

### **General Chemistry**

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

**Eurofins Cedar Falls** 

# **Sample Summary**

Client: HDR Inc Job ID: 310-300844-1

Project/Site: Metro Park EAST-GU-3

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
310-300844-1	GU-3	Water	02/24/25 15:00	02/25/25 16:30

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# **Detection Summary**

Client: HDR Inc Job ID: 310-300844-1

Project/Site: Metro Park EAST-GU-3

Client Sample ID: GU-3

Analyte	Result Qualifier	RL	MDL	Unit	Dil Fac	D Me	thod	Prep Type
Zinc	0.492	0.0200	0.00970	mg/L	1	602	20B	Total/NA
Total Suspended Solids	22.0	5.00	3.70	mg/L	1	I-37	765-85	Total/NA

Lab Sample ID: 310-300844-1

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# **Client Sample Results**

Client: HDR Inc Job ID: 310-300844-1

Project/Site: Metro Park EAST-GU-3

Client Sample ID: GU-3 Lab Sample ID: 310-300844-1

Date Collected: 02/24/25 15:00 Matrix: Water

Date Received: 02/25/25 16:30

Method: SW846 6020B - Metals (ICP/MS)									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Zinc	0.492		0.0200	0.00970	mg/L		03/03/25 09:00	03/06/25 13:47	1
General Chemistry									

General Chemistry								
Analyte	Result Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Total Suspended Solids (USGS	22.0	5.00	3.70	mg/L			02/26/25 08:27	1
I-3765-85)								

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## **Definitions/Glossary**

Client: HDR Inc Job ID: 310-300844-1

Project/Site: Metro Park EAST-GU-3

### Glossary

RPD

TEF

TEQ

TNTC

Abbreviation	These commonly used abbreviations may or may not be present in this report.
<del>\$</del>	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)

Relative Percent Difference, a measure of the relative difference between two points

Toxicity Equivalent Factor (Dioxin)

Too Numerous To Count

Toxicity Equivalent Quotient (Dioxin)

**Eurofins Cedar Falls** 

### QC Sample Results

Client: HDR Inc Job ID: 310-300844-1

Project/Site: Metro Park EAST-GU-3

Method: 6020B - Metals (ICP/MS)

Lab Sample ID: MB 310-447744/1-A Client Sample ID: Method Blank

**Matrix: Water** 

Analysis Batch: 448288

Prep Type: Total/NA **Prep Batch: 447744** 

MB MB

Dil Fac Analyte Result Qualifier RL MDL Unit D Prepared Analyzed Zinc <0.0200 0.0200 0.00970 mg/L 03/03/25 09:00 03/06/25 12:36

Lab Sample ID: LCS 310-447744/2-A Client Sample ID: Lab Control Sample **Matrix: Water** Prep Type: Total/NA

Analysis Batch: 448288

Prep Batch: 447744 Spike LCS LCS %Rec Analyte Added Result Qualifier Unit D %Rec Limits Zinc 0.200 0.2324 mg/L 116 80 - 120

Method: I-3765-85 - Residue, Non-filterable (TSS)

Lab Sample ID: MB 310-447532/1 Client Sample ID: Method Blank Prep Type: Total/NA

**Matrix: Water** 

Analysis Batch: 447532

MB MB

Analyte Result Qualifier RL MDL Unit D Prepared Analyzed Dil Fac Total Suspended Solids <5.00 5.00 3.70 mg/L 02/26/25 08:27

Lab Sample ID: LCS 310-447532/2 **Client Sample ID: Lab Control Sample** Prep Type: Total/NA

**Matrix: Water** 

Analysis Batch: 447532

Spike LCS LCS %Rec Analyte Added Result Qualifier Unit %Rec Limits Total Suspended Solids 100 98.00 mg/L 81 - 116

**Eurofins Cedar Falls** 

Page 9 of 16

# **QC Association Summary**

Client: HDR Inc Job ID: 310-300844-1

Project/Site: Metro Park EAST-GU-3

### **Metals**

### Prep Batch: 447744

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-300844-1	GU-3	Total/NA	Water	3005A	
MB 310-447744/1-A	Method Blank	Total/NA	Water	3005A	
LCS 310-447744/2-A	Lab Control Sample	Total/NA	Water	3005A	

### Analysis Batch: 448288

Lab Sample ID 310-300844-1	Client Sample ID GU-3	Prep Type Total/NA	Matrix Water	Method 6020B	Prep Batch 447744
MB 310-447744/1-A	Method Blank	Total/NA	Water	6020B	447744
LCS 310-447744/2-A	Lab Control Sample	Total/NA	Water	6020B	447744

### **General Chemistry**

### Analysis Batch: 447532

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
310-300844-1	GU-3	Total/NA	Water	I-3765-85	
MB 310-447532/1	Method Blank	Total/NA	Water	I-3765-85	
LCS 310-447532/2	Lab Control Sample	Total/NA	Water	I-3765-85	

**Eurofins Cedar Falls** 

### **Lab Chronicle**

Client: HDR Inc Job ID: 310-300844-1

Project/Site: Metro Park EAST-GU-3

**Client Sample ID: GU-3** Lab Sample ID: 310-300844-1

Matrix: Water

Date Collected: 02/24/25 15:00 Date Received: 02/25/25 16:30

	Batch	Batch		Dilution	Batch			Prepared
Prep Type	Туре	Method	Run	Factor	Number	Analyst	Lab	or Analyzed
Total/NA	Prep	3005A			447744	Y3EC	EET CF	03/03/25 09:00
Total/NA	Analysis	6020B		1	448288	NFT2	EET CF	03/06/25 13:47
Total/NA	Analysis	I-3765-85		1	447532	DGU1	EET CF	02/26/25 08:27

### Laboratory References:

EET CF = Eurofins Cedar Falls, 3019 Venture Way, Cedar Falls, IA 50613, TEL (319)277-2401

# **Accreditation/Certification Summary**

Client: HDR Inc Job ID: 310-300844-1

Project/Site: Metro Park EAST-GU-3

### **Laboratory: Eurofins Cedar Falls**

The accreditations/certifications listed below are applicable to this report.

Authority	Program	Identification Number	<b>Expiration Date</b>
lowa	State	007	12-01-25

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## **Method Summary**

Client: HDR Inc Job ID: 310-300844-1

Project/Site: Metro Park EAST-GU-3

Method	Method Description	Protocol	Laboratory
6020B	Metals (ICP/MS)	SW846	EET CF
I-3765-85	Residue, Non-filterable (TSS)	USGS	EET CF
3005A	Preparation, Total Metals	SW846	EET CF

#### **Protocol References:**

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.
USGS = "Methods For Analysis Of Water And Fluvial Sediments", USGS, 1989

#### Laboratory References:

EET CF = Eurofins Cedar Falls, 3019 Venture Way, Cedar Falls, IA 50613, TEL (319)277-2401



# **Environment Testing America**



# Cooler/Sample Receipt and Temperature Log Form

Client Information					
Client Metro Vacto					
City/State: CITY DIS Moines STATE	Project:				
Receipt Information					
Date/Time Received.  DATE 235-35	Received By. PH				
Delivery Type. UPS FedEx	☐ FedEx Ground ☐ US Mail ☐ Spee-Dee				
Lab Courier Lab Field Services Client Drop-off Other:					
Condition of Cooler/Containers					
Sample(s) received in Cooler? Yes No	If yes: Cooler ID:				
Multiple Coolers?					
Cooler Custody Seals Present? Yes No	If yes: Cooler custody seals intact? Yes				
Sample Custody Seals Present? Yes No If yes: Sample custody seals intact? Yes No					
Trip Blank Present? ☐ Yes ☐ No If yes: Which VOA samples are in cooler? ↓					
Temperature Record					
Coolant Wet ice Blue ice Dry id	ce Other: NONE				
Thermometer ID· $\rho$	Correction Factor (°C):				
• Temp Blank Temperature – If no temp blank, or temp blank	temperature above criteria, proceed to Sample Container Temperature				
Uncorrected Temp (°C): 6.8	Corrected Temp (°C): 0.8				
Sample Container Temperature	Looverhold				
Container(s) used:	CONTAINER 2				
Uncorrected Temp (°C)					
Corrected Temp (°C)·					
Exceptions Noted					
1) If temperature exceeds criteria, was sample(s) received same day of sampling?					
2) If temperature is <0°C, are there obvious signs that the integrity of sample containers is compromised? (e g., bulging septa, broken/cracked bottles, frozen solid?)					
NOTE If yes, contact PM before proceeding If no, proceed with login Additional Comments					
•					

Document CED-P-SAM-FRM45521 Revision 26 Date 27 Jan 2022

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> Chain of Custody Record Cedar Falls, IA 50613 Phone (319) 277-2401 Phone (319) 277-2425

**Eurofins Cedar Falls** 

3019 Venture Way

Special Instructions/Note: Ver 05/06/2024 Company Company Company Sample Disposal ( A fee may be assessed if samples are retained longer than 1 month)

Return To Client Disposal By Lab Archive For Mont Special Instructions/QC Requirements COC No: 310-103558-27664 1 Preservation Codes D - HNO3 N - None Page Page 1 of 1 Total Number of containers Date/Time: Date/Time: Date/Time: Method of Shipment Carrier Tracking No(s): State of Origin: **Analysis Requested** Cooler Temperature(s) °C and Other Remarks: Lab PM
Calhoun Conner M
E-Mail:
Conner Calhoun@et.eurofinsus.com Received by Received by Received by × 22T - 38\_39TE\_ × 50208 - Zine Only <u>ユ</u>え Time: Company DX (W=water, S=solid, O=waste/oil, BT=Tissue, A=Air) Preservation Code: Water Matrix Company Sahr Sample Type (C=comp, Radiological G=grab) 538-445-8119 D Compliance Project: A Yes A No 5:2 PO#:
Purchase Order not required
WO#: Sample Time 1500 Sampler M. Cheel Date: Unknown FAT Requested (days): Due Date Requested: Date/Time: Sample Date 22/h4/2 Project #: 31016556 SSOW#: Date/Time: Phone: Poison B Skin Imitant Saloh Deliverable Requested 1 II, III, IV, Other (specify) Custody Seal No ☐ Non-Hazard ☐ Flammable 300 East Locust Street Suite 100 Possible Hazard Identification Relinquished by Michael Metro Waste Authority-Dm Empty Kit Relinquished by: Custody Seals Intact: Δ Yes Δ No Project Name: Metro Park EAST- GU-3 Client Information Sample Identification aph@mwatoday com Phone: 402-392-6714(Tel) State Zip: IA, 50309-1864 Andrew Phillips elinquished by Relinquished by City. Des Moines <u>G</u>C-3

### **Login Sample Receipt Checklist**

Client: HDR Inc Job Number: 310-300844-1

Login Number: 300844 List Source: Eurofins Cedar Falls

List Number: 1

Creator: Hirsch, Preston

oreator. Till still, i Testori		
Question	Answer Comment	
Radioactivity wasn't checked or is = background as measured by a survey meter.</td <td>N/A</td>	N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

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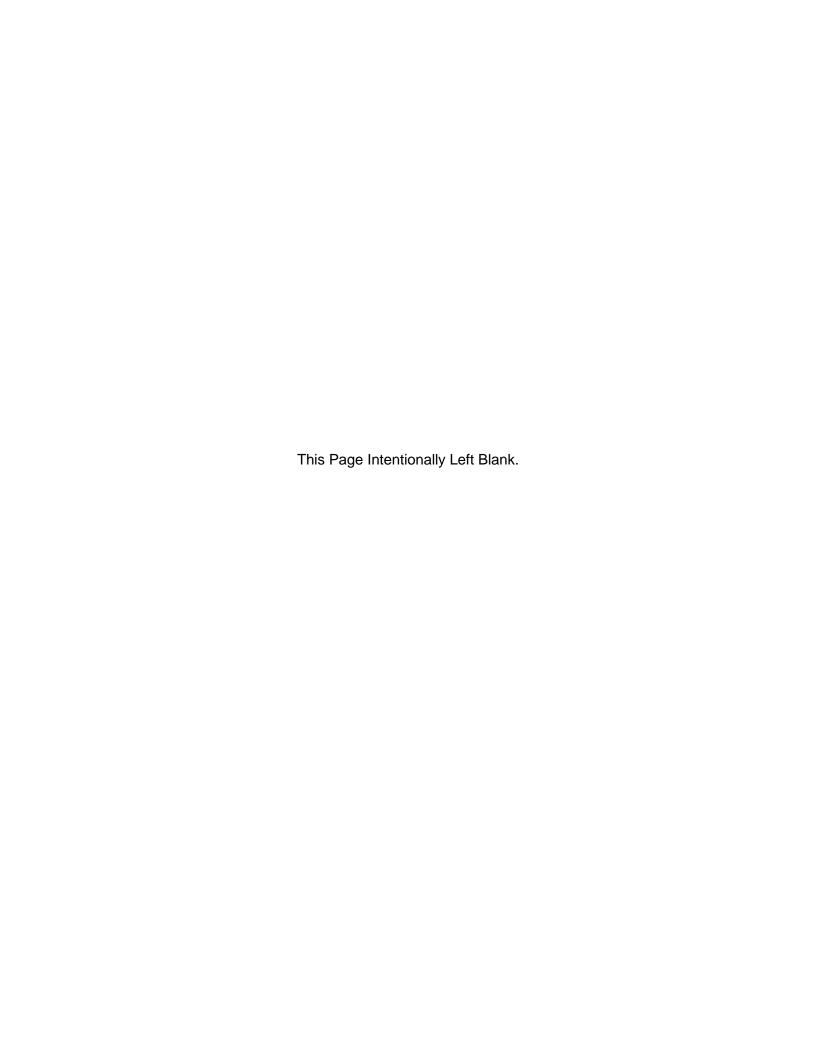
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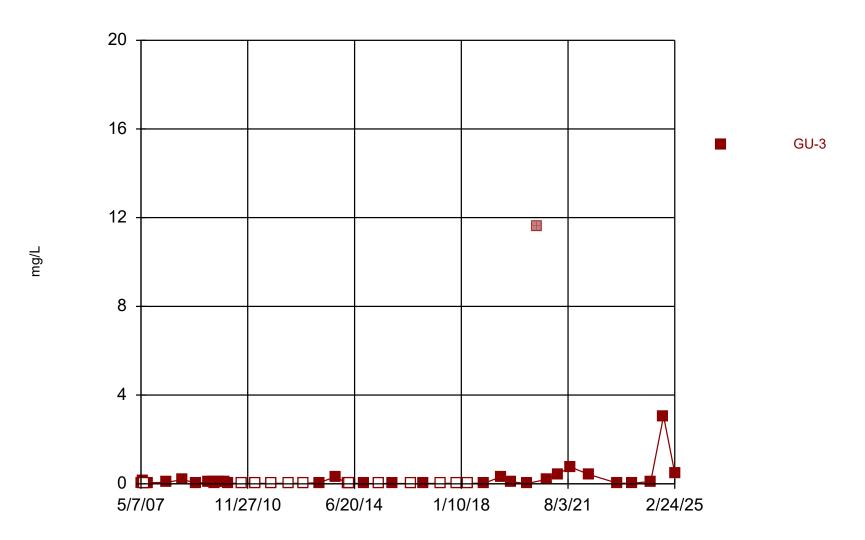
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## **Time Series**



Constituent: Zinc Analysis Run 3/26/2025 4:40 PM View: Interwell GU-3 CI