

November 1, 2021

Mr. Glenn May  
New York State Department of Environmental Conservation  
270 Michigan Avenue  
Buffalo, NY 14203-2999

**RE: Third Quarter 2021 – Status Report  
Former Stauffer Management Company, LLC  
Lewiston, New York  
Langan Project No.: 130117301**

Dear Mr. May:

Attached is the status report for the third quarter of 2021 activities at the Stauffer Management Company LLC site in Lewiston, New York. Langan Engineering, Environmental, Surveying, Landscape Architecture and Geology, D.P.C. (Langan) has conducted the operation, maintenance, and monitoring activities for the treatment system on behalf of Stauffer Management Company (SMC). No new changes to system operation, monitoring, or reporting are being requested as part of this status report.

Please call me if you need any additional information or if you have comments.

Sincerely,

**Langan Engineering, Environmental, Surveying,  
Landscape Architecture and Geology, D.P.C.**



Matthew Ambrusch, PE, MBA  
Senior Project Manager – Remediation Technology

MW:ma

Enclosure(s): Table 1 – System Extraction and Discharge Flow Rates  
Table 2 – Weekly Mid-Carbon Sampling Results  
Table 3 – Monthly Influent Sampling Results  
Table 4 – Monthly Effluent Sampling Results  
Table 5 – Quarterly Effluent (SPDES) Sampling Results

cc: Kurt Batsel (Dextra Group)  
John-Paul Rossi (SMC)  
Stewart Abrams, PE (Langan)

## 1. Operation and Maintenance Activities

Between July 1 and September 30, 2021, treatment system operations, consisting of the extraction of groundwater via 11 extraction wells, continued. The chemical feed system has been running continuously since initiating operation on February 11, 2019. The operation of the chemical feed system has proven effective at prolonging bag filter change-outs with no observed decrease in treatment system performance.

Per the New York State Department of Environmental Conservation (NYSDEC) Order of Consent Case No. CO 1-20181004 executed by the NYSDEC on June 12, 2019, wastes generated on site as a result of the operation of the treatment system are managed as U-listed hazardous waste.

### 1.1 Groundwater Extraction Wells

Groundwater extraction continued at wells EW-1 through EW-6, DPA-202, DPA-203, OW-3, and LR-66, except during the planned, complete system shutdown for: well modification, abandonment, and reinstallation; pump test performance; and well cleaning and disinfection activities between August 2<sup>nd</sup> and September 16<sup>th</sup>. Additional exceptions include minor periods of planned downtime due to bag filter change-outs, carbon exchanges, and other general maintenance tasks. Outside of these planned downtimes, EW-2, EW-3, EW-5 and EW-6 have been operational at full and continuous capacity throughout the reporting quarter.

The following extraction wells have been operational at a reduced capacity or have had modifications or repairs performed during this reporting quarter:

- The submersible pump at EW-1 experienced short-circuiting, requiring the pump to be pulled for repairs. This extraction well was inoperable for a period of approximately 8 weeks during the second quarter reporting period. The pump was repaired and brought back online after continuing to be offline for approximately two weeks at the beginning of the current reporting period. Extraction well EW-1 was abandoned and replaced with EW-1R during the first three weeks of shutdown activities. The submersible pump has been operating continuously in new well EW-1R since the system was restarted.
- All pneumatic pumps were in operation prior to the planned shutdown. However, rebuilding of these pumps with new components was determined necessary following the well cleaning and disinfection activities. Extraction pumps at wells EW-4, DPA-202, DPA-203, LR-66, and OW-3 were placed back into service following the end of this reporting period and are currently all operating normally.

The following extraction well did not operate during this reporting quarter:

- DPA-201 remains off-line. This well will continue to be measured periodically for depth to water; the pump will be recommissioned when groundwater levels return to a suitable level for sustained pumping.

Approximately 1,680,000 gallons of water were recovered from the extraction wells during the quarter, resulting in an average flow rate of approximately 21.6 gallons per minute. The total flow rate recorded from well-specific flow meters is more than that measured by the combined effluent flow meter. The cause of this discrepancy (i.e., fouling of the flow meter) is being investigated. A summary of the system totalizer readings is provided as **Table 1**.

## 1.2 Groundwater Treatment System

Chemical feed delivery system operations continued throughout the quarter. Disposal of accumulated spent bag filters was completed on September 15, 2021. A liquid-phase granular activated carbon (GAC) exchange was completed on September 16, 2021.

General system maintenance of the treatment system and other miscellaneous tasks were also completed during the quarter, as needed, to maintain normal and safe system operations.

## 1.3 Area A Soil Vapor Extraction System

As indicated in the previous quarterly updates, the Area A soil vapor extraction (SVE) system was shut down in early August 2014 and remains shut down, but in a standby operable mode. The NYSDEC indicated that to approve the request to permanently terminate the SVE operations, an Environmental Easement (EE) was required on the property as part of the remedial process. Stauffer Management Company LLC (SMC) prepared the EE documents, which were signed by SMC on April 28, 2015, and by the NYSDEC on August 24, 2015. The final EE was filed with Niagara County on September 4, 2015.

A Site Management Plan (SMP), submitted to the NYSDEC on May 25, 2017, includes provisions for removing the SVE system. Per email correspondence with Brian Sadowski dated September 3, 2019, the SMP required updates to reflect changes in system operation (i.e., addition of chemical feed system) and oversight (i.e., change in project consultants). These revisions were incorporated into a revised SMP that was submitted to the NYSDEC on June 16, 2020. Comments on the revised SMP were received from the NYSDEC on September 21, 2020. The system OM&M Plan was similarly updated and submitted to the NYSDEC as a component of the updated SMP on May 5, 2021. Approval of the updated SMP and OM&M Plan was received from the NYSDEC on June 3, 2021. With this approval, the decommissioning of the Area A SVE system is currently being coordinated and will be completed by the end of 2021.

## 2. Sampling

The following sampling events were conducted during the third quarter of 2021:

Weekly Volatile Organic Compound (VOC) Mid-Carbon Sampling: Weekly samples were collected at the midpoint of carbon treatment between the lead and lag treatment vessels. The samples were collected to assess breakthrough of contaminants from the lead carbon vessel. **Table 2** presents the sampling results.

Contaminants were detected in the mid-carbon sampling starting July 6, 2021. However, elevated contaminant concentrations (i.e., total mid-carbon concentration greater than 10% of the total influent concentration) were not detected until July 20, 2021. Accordingly, a carbon change-out was performed as a part of the system restart on September 16, 2021. A summary of the mid-carbon constituent detections is provided below.

- Elevated chloroform concentrations (up to 330 micrograms per liter [µg/L]) were detected on July 13, 2021, and continued until the September carbon exchange.

- Elevated methylene chloride concentrations (up to 30 µg/L) were detected on July 6, 2021, but were not detected between July 27, 2021 and the September carbon exchange.
- Elevated carbon tetrachloride concentrations (up to 460 µg/L) were detected on July 13, 2021, and continued until the September carbon exchange.
- Elevated carbon disulfide concentrations (up to 19 µg/L) were detected starting on July 13, 2021, but were not detected between July 27, 2021 and the September carbon exchange.
- Tetrachloroethene (PCE) and trichloroethene (TCE) were detected only on July 20, 2021, at concentrations of 4.7 µg/L and 3.5 µg/L, respectively.

Monthly Influent VOC Sampling: **Table 3** presents the results of the monthly combined influent VOC sampling. Carbon disulfide, carbon tetrachloride, chloroform, methylene chloride, PCE, and TCE were all detected above their respective groundwater quality criteria. The highest concentrations were observed during the July 6, 2021 sampling event, with a total site-specific parameter list VOC concentration of 5,991 µg/L.

Monthly Effluent VOC Sampling: **Table 4** presents the results of the monthly effluent VOC sampling. Throughout the quarter, all VOC concentrations were under both their respective daily discharge limit and their respective method detection limits.

Quarterly Effluent Sampling: The New York State Pollutant Discharge Elimination System (SPDES) equivalent semi-volatile organic compounds, metals, and total recoverable phenolic parameters were collected on September 17, 2021. **Table 5** presents the effluent SPDES equivalent sampling results. Zinc was detected at a concentration of 160 µg/L; discharge of zinc was below the pounds-per-day SPDES equivalent discharge limit. No other metals were detected. Semi-volatile organic compounds and total recoverable phenolics were non-detect for the quarter. Per the results of this sampling, all compounds in the system effluent were detected below their applicable discharge limits.

Monthly influent and effluent VOC samples were not collected during the month of August, as the system was shut down and not operational. With the Area A SVE blower shut down, no influent vapor samples were collected in the third quarter of 2021. As the Area A SVE system is currently being decommissioned, vapor samples are no longer expected to be collected at the site. The annual groundwater monitoring event was scheduled to be completed during this reporting quarter, but was delayed until the fourth quarter to allow the Area A SVE system decommissioning activities to be completed unhindered.

### 3. Deliverables in the Third Quarter

- September 16, 2021 carbon exchange event Generator Copy of Hazardous Waste Manifest provided to the NYSDEC and the Pennsylvania Department of Environmental Protection.

### 4. Fourth Quarter 2021 Planned Events

- Treatment system operations will continue through the fourth quarter of 2021.

- The chemical feed system will continue to operate full-time through the fourth quarter of 2021; optimizations will be made, as necessary.
- Routine treatment system sampling and maintenance will continue throughout the fourth quarter of 2021.
- A change-out of the lead GAC vessel will be completed.
- Spent bag filters will be disposed of off-site.
- Annual groundwater monitoring event will be performed.
- SVE decommissioning will be completed.

# TABLES

Table 1  
System Extraction and Discharge Flow Rates  
Former Stauffer Management Company, LLC  
Lewiston, New York  
Langan Project No.: 130117301  
11/1/2021

Date	Duration of Operation Since Last Monitoring Event	Totalizer Readings											
		EW-1		EW-2		EW-3		EW-4/T-4		EW-5/DPA-201		EW-6	
		Totalizer	Calculated Flow Rate	Totalizer	Calculated Flow Rate	Totalizer	Calculated Flow Rate	Totalizer	Calculated Flow Rate	Totalizer	Calculated Flow Rate	Totalizer	Calculated Flow Rate
		Gallons	GPM	Gallons	GPM	Gallons	GPM	Gallons	GPM	Gallons	GPM	Gallons	GPM
7/6/2021	8,640	420,331	0.73	2,036,552	12.5	2,184,829	9.23	44,952	0.15	3,533,666	10.3	1,321,147	0.00
7/13/2021	10,080	420,331	0.00	2,154,684	11.7	2,277,564	9.20	46,548	0.16	3,622,714	8.8	1,327,241	0.60
7/20/2021	10,080	420,331	0.00	2,263,931	10.8	2,375,519	9.72	48,288	0.17	3,797,928	17.4	1,332,009	0.47
7/27/2021	10,080	420,331	0.00	2,375,396	11.1	2,487,542	11.11	50,271	0.20	3,944,937	14.6	1,388,859	5.64
9/17/2021	74,880	424,493	0.06	2,526,979	2.0	2,636,339	1.99	51,965	0.02	4,154,301	2.8	1,456,176	0.90
9/21/2021	5,760	431,598	1.23	2,607,552	14.0	2,709,620	12.72	51,965	0.00	4,233,436	13.7	1,480,190	4.17
9/28/2021	10,080	444,032	1.23	2,756,772	14.8	2,876,619	16.57	51,965	0.00	4,368,069	13.4	1,524,393	4.39
10/4/2021	8,640	454,835	1.25	2,883,370	14.7	3,015,387	16.06	51,965	0.00	4,477,222	12.6	1,555,980	3.66
Totals / Averages		34,504	0.56	846,818	11.45	830,558	10.82	7,013	0.09	943,556	11.70	234,833	2.48

**Notes:**  
GPM - gallons per minute  
1. Grey boxes denote calculated data  
2. Calculated flow rates assume the well was operating at all times within that particular operational timeframe.

**Table 1**  
**System Extraction and Discharge Flow Rates**  
Former Stauffer Management Company, LLC  
Lewiston, New York  
Langan Project No.: 130117301  
11/1/2021

Date	Duration of Operation Since Last Monitoring Event	Totalizer Readings									
		DPA-202		DPA-203		OW-3		LR-66		Effluent	
		Totalizer	Calculated Flow Rate	Totalizer	Calculated Flow Rate	Totalizer	Calculated Flow Rate	Totalizer	Calculated Flow Rate	Totalizer	Calculated Flow Rate
	Minutes	Gallons	GPM	Gallons	GPM	Gallons	GPM	Gallons	GPM	Gallons	GPM
7/6/2021	8,640	6,095	0.01	1,113	0.00	9,924,989	0.17	822,136	0.37	42,067,923	20.4
7/13/2021	10,080	6,204	0.01	1,195	0.01	9,926,765	0.18	826,338	0.42	42,280,074	21.0
7/20/2021	10,080	6,306	0.01	1,205	0.00	9,928,476	0.17	832,015	0.56	42,510,154	22.8
7/27/2021	10,080	6,417	0.01	1,213	0.00	9,930,040	0.16	837,928	0.59	42,765,127	25.3
9/17/2021	74,880	6,505	0.00	1,233	0.00	9,931,513	0.02	843,157	0.07	43,097,592	4.4
9/21/2021	5,760	6,505	0.00	1,233	0.00	9,931,513	0.00	843,157	0.00	43,247,063	25.9
9/28/2021	10,080	6,505	0.00	1,233	0.00	9,931,513	0.00	843,157	0.00	43,521,952	27.3
10/4/2021	8,640	6,505	0.00	1,233	0.00	9,931,589	0.01	847,824	0.54	43,746,365	26.0
Totals / Averages		410	0.01	120	0.00	6,600	0.09	25,688	0.32	1,678,442	21.65

**Notes:**

GPM - gallons per minute

1. Grey boxes denote calculated data
2. Calculated flow rates assume the well was operating at all times within that particular operational timeframe.



Table 2  
Weekly Mid-Carbon Sampling Results  
Former Stauffer Management Company, LLC  
Lewiston, New York  
Langan Project No.: 130117301  
11/1/2021

Analyte	CAS Number	Discharge Limit (Daily Maximum)	Location	CBT					CBT					CBT					CBT					CBT					CBT									
			Sample Name	CBT_070621					CBT_071321					CBT_072021					CBT_072721					CBT_091721					CBT_092121					CBT_092821				
			Sample Date	7/6/2021					7/13/2021					7/20/2021					7/27/2021					9/17/2021					9/21/2021					9/28/2021				
			Unit	Result	Q	MDL	RL	DF	Result	Q	MDL	RL	DF	Result	Q	MDL	RL	DF	Result	Q	MDL	RL	DF	Result	Q	MDL	RL	DF	Result	Q	MDL	RL	DF	Result	Q	MDL	RL	DF
Volatile Organic Compounds																																						
Benzene	71-43-2	10	ug/l	0.41	U	0.41	1	1	0.41	U	0.41	1	1	0.41	U	0.41	1	1	4.1	U	4.1	10	10	0.41	U	0.41	1	1	0.41	U	0.41	1	1	0.41	U	0.41	1	1
Carbon Disulfide	75-15-0	Monitor	ug/l	0.19	U	0.19	1	1	0.46	J	0.19	1	1	19		0.19	1	1	1.9	U	1.9	10	10	0.19	U	0.19	1	1	0.19	U	0.19	1	1	0.19	U	0.19	1	1
Carbon Tetrachloride	56-23-5	10	ug/l	0.27	U	0.27	1	1	37		0.27	1	1	460		2.7	10	10	210		2.7	10	10	0.27	U	0.27	1	1	0.27	U	0.27	1	1	0.27	U	0.27	1	1
Chlorobenzene	108-90-7	10	ug/l	0.75	U	0.75	1	1	0.75	U	0.75	1	1	0.75	U	0.75	1	1	7.5	U	7.5	10	10	0.75	U	0.75	1	1	0.75	U	0.75	1	1	0.75	U	0.75	1	1
Chloroform	67-66-3	10	ug/l	0.34	U	0.34	1	1	34		0.34	1	1	330		3.4	10	10	140		3.4	10	10	0.34	U	0.34	1	1	0.34	U	0.34	1	1	0.34	U	0.34	1	1
Methylene Chloride	75-09-2	10	ug/l	1.3		0.44	1	1	9.1		0.44	1	1	30		0.44	1	1	4.4	U	4.4	10	10	0.44	U	0.44	1	1	0.44	U	0.44	1	1	0.44	U	0.44	1	1
Tetrachloroethene (PCE)	127-18-4	10	ug/l	0.36	U	0.36	1	1	0.36	U	0.36	1	1	4.7		0.36	1	1	3.6	U	3.6	10	10	0.36	U	0.36	1	1	0.36	U	0.36	1	1	0.36	U	0.36	1	1
Toluene	108-88-3	10	ug/l	0.51	U	0.51	1	1	0.51	U	0.51	1	1	0.51	U	0.51	1	1	5.1	U	5.1	10	10	0.51	U	0.51	1	1	0.51	U	0.51	1	1	0.51	U	0.51	1	1
Trichloroethene (TCE)	79-01-6	10	ug/l	0.46	U	0.46	1	1	0.46	U	0.46	1	1	3.5		0.46	1	1	4.6	U	4.6	10	10	0.46	U	0.46	1	1	0.46	U	0.46	1	1	0.46	U	0.46	1	1
Total Concentration	--	--	ug/l	1.3					80.56					847.2					350					ND					ND					ND				

**Notes:**  
Results compared to Discharge Limit (Daily Maximum)  
CAS - Chemical Abstract Service  
ug/l - Microgram per liter  
ND - Not detected  
Q - Qualifier  
MDL - Method detection limit  
RL - Reporting Limit  
DF - Dilution factor

**Qualifiers:**  
E - Concentration exceeds highest calibration standard.  
J – The analyte was positively identified and the associated numerical value is the approximate concentration of the analyte in the sample.  
UJ – The analyte was not detected at a level greater than or equal to the reporting limit; however, the reported reporting limit is approximate and may be inaccurate or imprecise.  
U – The analyte was analyzed for, but was not detected at a level greater than or equal to the level of the RL or the sample concentration for results impacted by blank contamination.

**Exceedance Summary:**  
10 - Result exceeds Discharge Limit (Daily Maximum)  
10 - MDL or RL greater than the applicable standard



**Table 3**  
**Monthly Influent Sampling Results**  
Former Stauffer Management Company, LLC  
Lewiston, New York  
Langan Project No.: 130117301  
11/1/2021

Analyte	CAS Number	NYSDEC Groundwater Criteria	Location	INF					INF				
			Sample Name	INF_070621					INF_091721				
			Sample Date	7/6/2021					9/17/2021				
			Unit	Result	Q	MDL	RL	DF	Result	Q	MDL	RL	DF
Volatile Organic Compounds													
Benzene	71-43-2	10	ug/l	33	U	33	80	80	33	U	33	80	80
Carbon Disulfide	75-15-0	0.7	ug/l	1800		15	80	80	180		15	80	80
Carbon Tetrachloride	56-23-5	50	ug/l	2600		22	80	80	3300		22	80	80
Chlorobenzene	108-90-7	5	ug/l	60	U	60	80	80	60	U	60	80	80
Chloroform	67-66-3	5	ug/l	1400		27	80	80	1700		27	80	80
Methylene Chloride	75-09-2	7	ug/l	85		35	80	80	100		35	80	80
Tetrachloroethene (PCE)	127-18-4	5	ug/l	51	J	29	80	80	100		29	80	80
Toluene	108-88-3	5	ug/l	41	U	41	80	80	41	U	41	80	80
Trichloroethene (TCE)	79-01-6	5	ug/l	55	J	37	80	80	74	J	37	80	80
Total Concentration	--	5	ug/l	5991					5454				

**Notes:**

CAS - Chemical Abstract Service  
ug/l - Microgram per liter  
Q - Qualifier  
MDL - Method detection limit  
RL - Reporting Limit  
DF - Dilution factor

**Qualifiers:**

E - Concentration exceeds highest calibration standard.  
J – The analyte was positively identified and the associated numerical value is the approximate concentration of the analyte in the sample.  
UJ – The analyte was not detected at a level greater than or equal to the reporting limit; however, the reported reporting limit is approximate and may be inaccurate or imprecise.  
U – The analyte was analyzed for, but was not detected at a level greater than or equal to the level of the RL or the sample concentration for results impacted by blank contamination.

**Exceedance Summary:**

- 10 - Result exceeds Discharge Limit (Daily Maximum)
- 10 - MDL or RL greater than the applicable standard



Table 4  
Monthly Effluent Sampling Results  
Former Stauffer Management Company, LLC  
Lewiston, New York  
Langan Project No.: 130117301  
11/1/2021

Analyte	CAS Number	Discharge Limit (Daily Maximum)	Location	EFF					EFF				
			Sample Name	EFF_070621					EFF_091721				
			Sample Date	7/6/2021					9/17/2021				
			Unit	Result	Q	MDL	RL	DF	Result	Q	MDL	RL	DF
Volatile Organic Compounds													
Benzene	71-43-2	10	ug/l	0.41	U	0.41	1	1	0.41	U	0.41	1	1
Carbon Disulfide	75-15-0	Monitor	ug/l	0.19	U	0.19	1	1	0.19	U	0.19	1	1
Carbon Tetrachloride	56-23-5	10	ug/l	0.27	U	0.27	1	1	0.27	U	0.27	1	1
Chlorobenzene	108-90-7	10	ug/l	0.75	U	0.75	1	1	0.75	U	0.75	1	1
Chloroform	67-66-3	10	ug/l	0.34	U	0.34	1	1	0.34	U	0.34	1	1
Methylene Chloride	75-09-2	10	ug/l	0.44	U	0.44	1	1	0.44	U	0.44	1	1
Tetrachloroethene (PCE)	127-18-4	10	ug/l	0.36	U	0.36	1	1	0.36	U	0.36	1	1
Toluene	108-88-3	10	ug/l	0.51	U	0.51	1	1	0.51	U	0.51	1	1
Trichloroethene (TCE)	79-01-6	10	ug/l	0.46	U	0.46	1	1	0.46	U	0.46	1	1
Total Concentration	--	--	ug/l	ND					ND				

Notes:

Results compared to Discharge Limit (Daily Maximum)  
CAS - Chemical Abstract Service  
ug/l - Microgram per liter  
ND - Not detected  
Q - Qualifier  
MDL - Method detection limit  
RL - Reporting Limit  
DF - Dilution factor

Qualifiers:

E - Concentration exceeds highest calibration standard.  
J – The analyte was positively identified and the associated numerical value is the approximate concentration of the analyte in the sample.  
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Exceedance Summary:

- 10 - Result exceeds Discharge Limit (Daily Maximum)
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Table 5  
Quarterly Effluent (SPDES) Sampling Results  
Former Stauffer Management Company, LLC  
Lewiston, New York  
Langan Project No.: 130117301  
11/1/2021

Analyte	CAS Number	Discharge Limit (Daily Maximum)	Location	EFF						Discharge Rate
			Sample Name	EFF_091721						
			Sample Date	9/17/2021						
			Unit	Result	Q	MDL	RL	DF		
Semi-Volatile Organic Compounds										
2,4-Dichlorophenol	120-83-2	1	ug/l	0.51	U	0.51	5	1	NA	
Hexachloroethane	67-72-1	10	ug/l	0.59	U	0.59	5	1	NA	
Naphthalene	91-20-3	10	ug/l	0.76	U	0.76	5	1	NA	
Metals										
Arsenic	7440-38-2	25	ug/l	5.6	U	5.6	15	1	0.0012	
Chromium, Total	7440-47-3	0.036*	ug/l	1	U	1	4	1	0.0002	
Copper	7440-50-8	0.072*	ug/l	1.6	U	1.6	10	1	0.0003	
Lead	7439-92-1	0.1*	ug/l	3	U	3	10	1	0.0006	
Nickel	7440-02-0	0.16*	ug/l	1.3	U	1.3	10	1	0.0003	
Selenium	7782-49-2	0.072*	ug/l	8.7	U	8.7	25	1	0.0018	
Zinc	7440-66-6	0.48*	ug/l	160		1.5	10	1	0.0336	
General Chemistry										
Phenolics, Total Recoverable	TOTPHEN	10	ug/l	3.5	U	3.5	10	1	NA	

Notes:

Results compared to Discharge Limit (Daily Maximum)  
CAS - Chemical Abstract Service  
ug/l - Microgram per liter  
Q - Qualifier  
MDL - Method detection limit  
RL - Reporting Limit  
DF - Dilution factor  
lbs/day: pounds per day (at assumed average of 35 gallons per minute)  
\* discharge limits for metals are in lbs/day

Qualifiers:

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J – The analyte was positively identified and the associated numerical value is the approximate concentration of the analyte in the sample.  
UJ – The analyte was not detected at a level greater than or equal to the reporting limit; however, the reported reporting limit is approximate and may be inaccurate or imprecise.  
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