

DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENTAL CONTROL

DIVISION OF WASTE AND HAZARDOUS SUBSTANCES
391 LUKENS DRIVE
NEW CASTLE, DELAWARE 19720

REMEDIATION SECTION

November 7, 2024

James Thompson and Company, Inc. P.O. Box 2013 Greenwood, DE 19950

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7017 2620 0000 3852 6962

PHONE: (302) 395-2600

FAX: (302) 395-2555

Alphatex LLC 106 Willow Rd Woodmere, NY 11598

RE: Notice of Liability for the James Thompson & Company, Inc. Site (DE-0070)

Dear Property Owner and Operator:

The purpose of this letter is to notify you, pursuant to §§ 9104 and 9105 of the Delaware Hazardous Substance Cleanup Act, 7 <u>Del. C.</u>, Chapter 91 (HSCA), that the Delaware Department of Natural Resources and Environmental Control ("DNREC" or the "Department") has documented the release or threatened release of hazardous substances, pollutants, or contaminants at the James Thompson & Company, Inc. Site (the "Site" or the "Facility"), located at 301 South Church Street, Greenwood, Delaware, and identified by Sussex County as tax parcel number 530-9.00-71.00. As the current and/or former owner and/or operator of the Site, James Thompson and Company, Inc. and Alphatex LLC are potentially responsible parties (PRP) as defined in §§ 9103(23) and 9105 of HSCA.

If you have carried out all appropriate inquiries pursuant to §9105(c)(2)b which documents that you had no reason to know of the release prior to acquiring the facility, please submit those documents to DNREC for review.

The Department has determined that a remedial investigation to evaluate the nature and extent of the release along with an evaluation of potential human health and ecological risks is required under HSCA to protect the public health and welfare and the environment. Based on the findings of the remedial investigation and risk assessment, remedial actions may be required under HSCA. The Department's conclusion arises from the presence of a hazardous substance(s), including per- and polyfluoroalkyl substances ("PFAS") in soil and groundwater

above the representative HSCA screening levels as outlined in the *James Thompson & Company, Inc. PFAS Investigation Summary Report* dated August 2024 prepared by the DNREC-Division of Water. The presence of hazardous substances is likely a result of operations at the Site.

DNREC encourages PRPs to enter into voluntary settlement agreements pursuant to §9107 of HSCA to provide appropriate responses to prevent threats to public health, welfare, or the environment.

The Voluntary Cleanup Program (VCP) approach established by HSCA and the Regulations Governing Hazardous Substance Cleanup allows a remedy, as defined therein, to be performed by potentially responsible parties under the authority of HSCA. The Facility is a site that would qualify for a remedy performed under the VCP. The VCP allows for an expedited cleanup process with reduced transaction costs. More information about the VCP is available via the following internet address:

https://dnrec.alpha.delaware.gov/waste-hazardous/remediation/voluntary-cleanup/

DNREC would like to work with you under the VCP.

If you believe you do not have the ability to pay for the actions required, please contact the DNREC staff member identified below for information on DNREC's ability to pay analysis, which could lessen any financial burden on you from the required action.

Please submit a response to DNREC within sixty (60) days of the date of this notice letter regarding your decision to enter the VCP or to provide information for an ability to pay analysis. If you wish to schedule an in person or virtual meeting to further discuss this matter, please contact DNREC. Failure to respond to this notice may lead to additional enforcement actions.

Please note that this notice is separate from any regulatory requirements or enforcement actions by other DNREC Divisions or Sections. Therefore, response to this Notice does not satisfy Owner and Operator obligations to comply with Spray Irrigation Permit No. 359148-04 issued by the Division of Water and any enforcement actions related thereto.

If you have any questions pertaining to this letter or the provisions of HSCA, please contact Mariya Chiger (Site Project Officer), or me at (302) 395-2600.

Sincerely,

Oazi Salahuddin

Environmental Program Administrator

Enclosures: James Thompson & Company, Inc. PFAS Investigation Summary Report

(August 2024)

cc: Mariya Chiger, Project Officer, DNREC- Remediation Section
Amy Bryson, Program Manager II, DNREC- Remediation Section
Brian Churchill, Environmental Scientist, DNREC- Division of Water
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James Thompson & Company, Inc. PFAS Investigation Project Data Summary Report



Prepared by

Delaware Department of Natural Resources and Environmental Control

Division of Water

Commercial and Government Services Section & Resource Protection Section

August 2024

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Executive Summary

In July 2023, the Delaware Department of Natural Resources and Environmental Control (DNREC), Division of Water (DW) launched a screening study of PFAS in wastewater which included sampling of influent, effluent, soils from spray application fields and rapid infiltration basins (RIBs), groundwater and adjacent surface water. Fourteen wastewater treatment facilities and disposal sites over the entire state were selected for the study. Sites were chosen to include varying sources of influent (residential, municipal, industrial) and disposal methods. The sampling plan called for a total of 56 influent, 56 effluent, 92 groundwater, 20 surface water, and 39 soil samples to be collected from wastewater treatment and disposal facilities in this screening study.

Upon the receipt and evaluation of the laboratory analysis results from the first rounds of sampling, James Thompson and Company, Inc, a fabric processing plant with an onsite wastewater treatment and disposal facility, was selected as a site for further studies due to elevated PFAS levels in the samples. The facility has a long operational history, and a broad range of media available for characterization around the site including, influent, effluent, soil, surface water, groundwater, and treatment residuals/sediments. This data summary report documents the findings of the PFAS studies performed at the James Thompson and Company facility.

As our understanding of PFAS in the environment continues to evolve, the available analytical methods, data reporting structures (e.g. lists of PFAS compounds reported by laboratories) and data analysis techniques are also rapidly changing. As a result, the data collected and analyzed during this study have been summarized and presented in several different ways, in hopes that any anomalies or variations will stand out. Results will also help to direct resources towards areas in need of further investigation and/or evaluation.

This assessment was not conducted to evaluate human health or ecological risk from exposure to PFAS compounds, or to make any final conclusions about disposal methods. Additional human health and ecological risk characterization were not conducted and presented as part of this study because there are very few established criteria for PFAS compounds to provide adequate perspective. More importantly, the improper interpretation and application of criteria can lead to incorrect conclusions. However, in review of the information presented in this data summary report, actions have already taken place to protect domestic water use and an investigation into wastewater facility closing procedures.

Acronyms and Abbreviations

4:2 FTS 1H,1H,2H,2H-Perfluorohexane Sulfonic Acid

5:3 FTCA5:3 Fluorotelomer Carboxylic Acid6:2 FTCA6:2 fluorotelomer Carboxylic Acid

6:2 FTS 1H,1H,2H,2H-Perfluorooctane Sulfonic Acid

6:2 FTUCA 6:2 Fluorotelomer Alpha, Beta-Unsaturated Carboxylate

8:2 FTS 1H,1H,2H,2H-Perfluorodecane Sulfonic Acid

ADONA 4,8-Dioxa-3H-Perfluorononanoic Acid

AFFF Aqueous Film Forming Foam COPC Contaminant of Potential Concern

DNREC Delaware Department of Natural Resources and Environmental Control

DI Deionized

DW Division of Water

DWHS Division of Waste & Hazardous Substances

ECF Electrochemical Fluorination EDD Electronic Data Deliverable

ELS DNREC Environmental Laboratory Section EQuIS Environmental Quality Information System

ESA Ether Sulfonic Acid

FASA Perfluoroalkane Sulfonamide FCA Fish Consumption Advisory FOSA Perfluorooctane Sulfonamide

FOSAA Perfluorooctane Sulfonamido Acetic Acid FOSE Perfluorooctane Sulfonamide Ethanol FTCA Fluorotelomer Carboxylic Acid FTSA Fluorotelomer Sulfonic Acid HDPE High Density Polyethylene

HFPO-DA Hexafluoropropylene Oxide Dimer Acid (aka Gen-X)

HSCA Delaware Hazardous Substance Cleanup Act ITRC Interstate Technology and Regulatory Council

LC-MS/MS Liquid Chromatography with Tandem Mass Spectrometry

MCL Maximum Contaminant Level MDL Method Detection Limit

N-EtFOSAA N-Ethyl Perfluorooctane Sulfonamido Acetic Acid N-MeFOSAA N-Methyl Perfluorooctane Sulfonamido Acetic Acid

PDF Portable Document Format

PFAA Perfluoroalkyl Acid

PFAS Per and Polyfluoroalkyl Substances

PFBA Perfluorobutanoic Acid

PFBS Perfluorobutane sulfonic Acid PFCA Perfluoroalkyl Carboxylic Acid

PFDA Perfluorodecanoic Acid

PFDS Perfluorodecanesulfonic Acid PFDoA Perfluorododecanoic Acid

PFECA Per- and Polyfluoroether Carboxylic Acid

PFECA B Perfluoro-3,6-dioxaheptanoic Acid (aka NFDHA)
PFEESA Perfluoro-2-Ethoxyethanesulfonic Acid (aka PES)

PFHpA Perfluoroheptanoic Acid

PFHpS Perfluoroheptanesulfonic Acid

PFHxA Perfluorohexanoic Acid

PFHxS Perfluorohexanesulfonic Acid PFMBA Perfluoro-4-Methoxybutanoic Acid PFMOAA Perfluoro-2-Methoxyacetic Acid PFMPA Perfluoro-3-Methoxypropanoic Acid

PFNA Perfluorononanoic Acid

PFO2HxA Perfluoro-3,5-Dioxahexanoic Acid PFO3OA Perfluoro-3,5,7-Trioxaoctanoic Acid

PFOA Perfluorooctanoic Acid
PFOS Perfluorooctanesulfonic Acid
PFPeA Perfluoropentanoic Acid
PFPeS Perfluoropentanesulfonic Acid

PFPrA Pentafluoropropionic Acid or PFF Acid

PFSA Perfluoroalkyl Sulfonic Acid PFTeDA Perfluorotetradecanoic Acid PFTrDA Perfluorotridecanoic Acid PFUnA Perfluoroundecanoic Acid

PPB Parts Per Billion (equivalent to micrograms per liter or μg/L)
PPM Parts Per Million (equivalent to milligrams per liter or mg/L)
PPT Parts Per Trillion (equivalent to nanograms per liter or ng/L)

QA Quality Assurance

QAPP Quality Assurance Project Plan QAPrP Quality Assurance Program Plan

QC Quality Control RL Reporting Limit

SOP Standard Operating Procedure

USEPA U.S. Environmental Protection Agency

WWTP Wastewater Treatment Plant

1. Introduction

In July 2023, the Delaware Department of Natural Resources and Environmental Control (DNREC), Division of Water (DW) launched a screening study of PFAS in wastewater which included sampling of influent, effluent, soils from spray application fields and rapid infiltration basins (RIBs), groundwater and adjacent surface water. Fourteen wastewater treatment facilities and disposal sites over the entire state were selected for the study. Sites were chosen to include varying sources of influent (residential, municipal, industrial) and disposal methods. The sampling plan called for a total of 56 influent, 56 effluent, 92 groundwater, 20 surface water, and 39 soil samples to be collected from wastewater treatment and disposal facilities in this screening study. (DNREC, 2023a).

Upon the receipt and evaluation of the laboratory analysis results from the first rounds of sampling, James Thompson and Company, Inc, (JT) a fabric processing plant with an onsite wastewater treatment and disposal facility, was selected as a site for further studies due to elevated PFAS levels in the samples. The facility has a long operational history, and a broad range of media available for characterization around the site including, influent, effluent, soil, surface water, groundwater, and treatment residuals/sediments from the storage lagoon.

1.1 Project Need

Per- and polyfluoroalkyl substances (PFAS) which are a large class of human-made emerging contaminants of concern that include perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS). PFAS have been used since the 1950's as stain and soil repellents for carpets and clothing textiles, oil and grease resistance for food contact paper and surfactants in firefighting foams. PFAS are highly persistent in the environment and some bioaccumulate in humans (Brunn, 2023). There is evidence that continued exposure to certain PFAS above specific levels may lead to adverse health effects. (NTP, 2016)

According to existing data, PFAS are found in virtually all wastewater and biosolids at varying concentrations (PCWR et. al, 2020; Bogdan, 2021). To examine PFAS in the waste stream, DNREC developed a project design and sampling plan to investigate the concentrations of certain PFAS compounds in wastewater influent, effluent, and biosolids at selected wastewater treatment plants across the state, as well as the soils and groundwater from related wastewater disposal (land application) sites. Preliminary analysis has shown elevated levels of PFAS in some of the waste streams and groundwater from related land application sites investigated via this study. James Thompson (JT) in particular exhibited high levels of PFAS in groundwater from land application activities. Therefore, to protect the public and better understand PFAS fate and transport, a further investigation was conducted at the JT facility to better quantify the impacts of PFAS to the area.

1.2 Site Description

James Thompson and Company, Inc. is a fabric processing facility located at 301 S. Church Street Greenwood, Delaware (38.7993, -75.5970). Opened in 1971, the company originally had been producing 60,000 to 100,000 gallons per day (GPD) of wastewater from fabric finishing, fabric dying, fabric rinsing, burlap bleaching, boiler blow down water, and water conditioner back washing. Daily wastewater discharge had decreased in recent years with an average of 27,700 GPD in 2022. Dying and bleaching operations had been reduced in recent years and totally ceased as of late April 2023. Currently, no wastewater is being discharged into the storage lagoon or onto the spray irrigation fields for disposal.

While in operation, the wastewater disposal consisted of a sediment ditch with bar screens, two sediment pits and two pumps to convey wastewater to the aerated storage lagoon. From the lagoon the wastewater was spray irrigated via three center pivot system and a stationary sprinkler zone onto 45.15 acres planted in orchard grass, alfalfa and corn.

According to design plans the storage lagoon is a structure 315 feet by 130 feet in surface area with 2:1 side slopes. It is divided into two basins with the waste inflow located in the smaller 130 by 115 feet basin with a 6 ft. berm between the two basins. Each basin has a bottom elevation of 44.0 ft. and a surrounding bank elevation of nominally 55.0 ft. The irrigation suction pipe invert is at elevation of 49.0 ft. and is centered in the larger basin. There is an emergency overflow located in the receiving basin at an elevation of 53.0 ft.

The wastewater had been spray irrigated on fields of the Woodstown-Fallsington class of sandy loam soils. These soils have a permeability of 0.63 to 6.3 inches per hour and a transmissivity of 3000-4000 ft²/day. (USDA, 1974) In a normal year the depth to groundwater is 6-9 ft. but can range from 0-19 ft. (DGS, 2006). The thickness of the surficial aquifer in the area is 40 to 60 feet and groundwater flow is generally towards the southeast (DGS, 2006). The fields slope from an elevation of 50 ft. to 45 ft. NAVD88. (DGS, 2019)

Thirteen wells were previously installed at or nearby the facility for monitoring during spray irrigation activities. Three of these wells were selected for groundwater sampling in the initial study (JT-GW78710, JT-GW50018 and JT-GW10234).

Figure 1 shows regional location of the JT facility and Figure 2 shows soil and groundwater sampling locations in the original screening study.

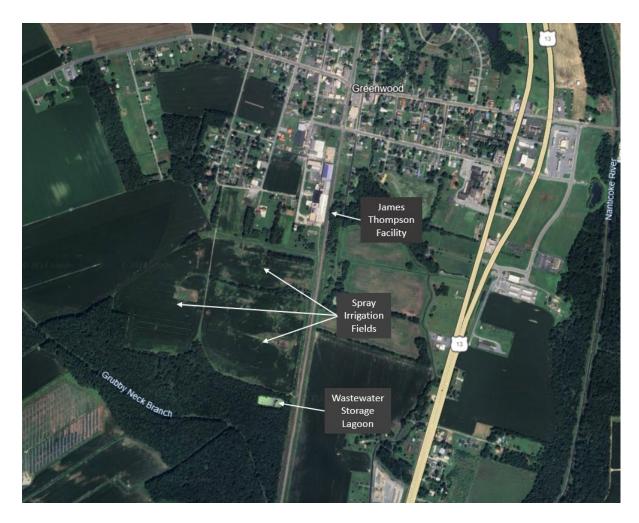


Figure 1. James Thompson and Company location.



Figure 2. Original screening study sampling locations

2. Sample Collection

During the original screening study, started in July 2023, there was not any active wastewater operations occurring at the facility; therefore, wastewater samples from the storage lagoon were collected as representative of effluent (JT-EF1 though 4). A total of 12 groundwater samples were collected from 3 selected monitoring wells at the facility. Additionally, 5 soil samples were collected from 2 locations at different depths (JT-SL1, JT-SL2; see Figure 2 for site locations).

Due to the elevated levels of PFAS detected in the original screening, as well as the opportunity to assess PFAS fate and transport from multiple environmental media pathways, a decision was made to conduct a further PFAS investigation of the site which included additional sampling of:

- groundwater from two additional monitoring wells at the facility
- surface water from the two creeks downgradient from the facility
- groundwater from nearby downgradient domestic wells
- the facility water supply prior to any processing, and
- sediments from the effluent pre-spray storage lagoon.

2.1 Groundwater

Of the thirteen monitoring wells at the facility, three wells JT-GW78710 (MW-8), JT-GW50018 (MW-6) and JT-GW10234 (MW-2) were sampled during the original screening study. For the enhanced study two more downgradient wells were selected: JT-GW91988 (MW-10) and JT-GW10237 (MW-05), as shown on Figure 3. With the addition of those two monitoring wells, the wells utilized for the expanded study now consist of one upgradient (JT-GW78710), one within the spray field and three downgradient of the groundwater flow near the boundary of the facility (one of which was downgradient of the storage lagoon). Groundwater from the wells for this expanded study was sampled quarterly for a year, same as the other three sampled during the original screening study.

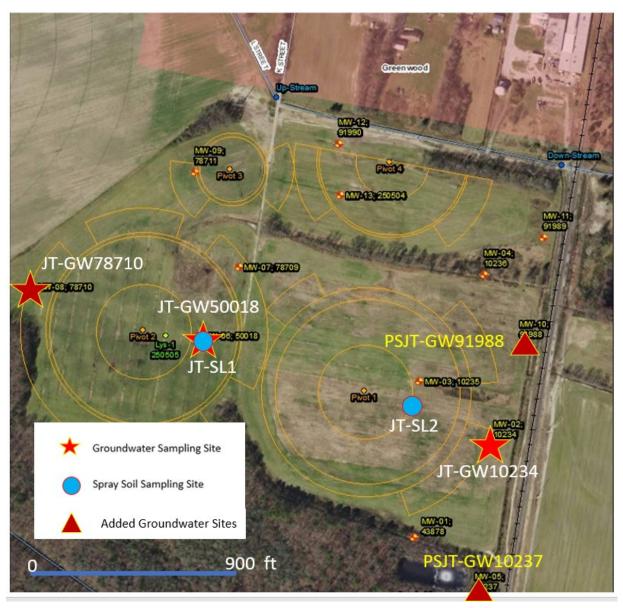


Figure 3. Additional groundwater sampling sites.

2.2 Soil

There are two soil sample locations (JT-SL1, 2, see Figure 2) within the spray irrigation fields. Samples were collected with a hand auger at depths of 1 foot, 3 feet and 6 feet below the surface. The groundwater table was encountered before reaching the desired depth of 6 feet at JT-SL2; therefore, only 2 samples were collected for that sample location (at 1 and 3 ft). Soil samples were collected once in July 2023 as part of the initial screening study.

2.3 Surface Water

The Grubby Neck Branch, to the south of the facility and the Cart Branch, to the east of the facility, are both likely receiving groundwater inflow from the spray fields of the facility. Five surface water sampling locations were selected (JT-SW1 through 5, Figure 4). Samples were collected using SiREM PFASsive passive samplers with a seven-day deployment. The samplers are a diffusion-based equilibrium passive sampling device that was developed and validated for relevant PFAS in porewater and surface water. Passive sampling involves deploying a sampler consisting of a receiving phase that can accumulate the analytes of interest due to chemical potential differences (Salim, 2019). Upon retrieval, the water from the sampler is treated like a regular water sample; the PFAS can be concentrated and measured using traditional United States Environmental Protection Agency laboratory methods without the additional extraction steps required for sorbents. (https://www.siremlab.com/sediment-pore-water-sampler/pfassive, Shoemaker, 2020) The results are presented as concentrations in nanograms per liter (ng/L).



Figure 4. Surface water and domestic well sampling sites

2.4 Downgradient Offsite Domestic Wells

There are four residences downgradient from the effluent spray field with domestic wells as their drinking water supply, which were identified for sampling for this study (JTPW-1 through 4, Figure 4). While one of the four wells is screened at a depth of 300 feet (within a confined aquifer), the rest were installed in the unconfined aquifer ranging in screened depth from 30 to 60 feet below the surface.

As part of the sampling plan, it was anticipated that domestic wells at the residences would be sampled a maximum of two times. If there was a presence of PFAS compounds above existing criteria (i.e., EPA MCLs or DE HSCA SLs; see Section 3) in any of the first-round samples, a second confirmatory sample from the same well would be collected. If PFAS was not detected, no additional sampling would be conducted. Only JTPW-2 was sampled twice in this study(see Section 4).

2.5 Water Supply

Source water from the well used for the production processes at the facility was sampled to identify the potential existence of PFAS in the water supply (JT-Plant). PFAS was detected but at levels below existing criteria thus no additional sample was collected (see Section 3 and Section 4). Water supply for current activities at the plant is sourced from the town of Greenwood. No analysis was performed on this water since the Greenwood water supply was sampled for PFAS in another study by DNREC.

2.6 Lagoon Sediments

Historically, effluent from the facility process operations only was discharged into a storage lagoon before being used for crop irrigation. Over time, suspended solids in treated wastewater accumulated as residual sediment on the bottom of the storage lagoon. Since no wastewater is generated with current limited operations at the facility, sediments from the bottom of the storage lagoon will likely resemble the historic sludge generated from the wastewater treatment plant of the facility. Three sediment samples from different locations of the storage lagoon were collected from three sampling locations (PSJT-SD1 through 3, Figure 5). These samples were collected from the surface of the sediment layer using a petit ponar sampler.

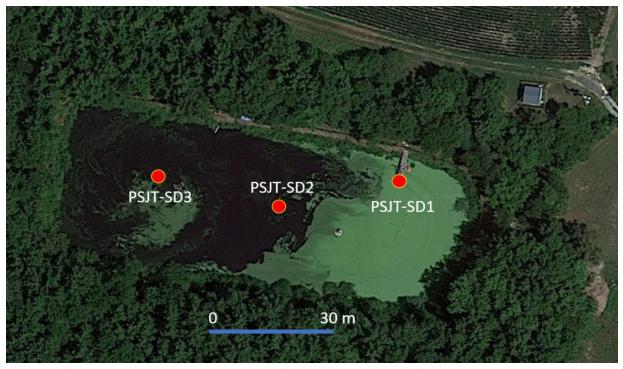


Figure 5. Sediment sampling locations at the bottom of the effluent storage lagoon

3. Data Evaluation and Presentation Methods

As our understanding of PFAS in the environment continues to evolve, the available analytical methods, data reporting structures (e.g. lists of PFAS compounds reported by laboratories) and data analysis techniques are also rapidly changing. As a result, the data collected and analyzed during this study have been summarized and presented in several different ways, in hopes that any anomalies or variations will stand out. Results will also help to direct resources towards areas in need of further investigation and/or evaluation.

In general, laboratories have a 'lowest concentration' that can be confidently measured in a sample using the available analytical instruments and methods. This value is called the Reporting Limit (RL). A Method Detection Limit (MDL) is lower than the RL and is a statistical calculation of the lowest concentration that can be detected by the instruments and methods. Typically, each compound that is part of analysis has its own RL and MDL, which are different from the RL and MDL of other compounds in the same analysis. When laboratories detect a compound in a sample, but the concentration is between the RL and the MDL, the result is marked with a letter "J" to indicate it is an approximate value. In these cases, the laboratory is confident that the compound is present in the sample because the result is greater than the MDL, but the laboratory cannot say exactly how much of that compound is present because the result is less than the RL. When compounds are not detected in a sample, the laboratory will still report the result as the MDL concentration but will mark it with a letter "U" to show that "the analyte was analyzed for, but not detected." In these cases, the compounds may be present in a sample, but if so, they are at concentrations that are too low to detect. Therefore, results marked with a "U" should more realistically be reported as "< MDL". However, for this report, any result that

was reported by the laboratory and marked with a "U" was assigned a concentration of zero for purposes of data display and computations. This was done for ease of public understanding of the large quantity of data summarized in this report and because the intent of data evaluation is to identify anomalies when data is compared to each other.

3.1 Individual Compounds

Using USEPA Method 1633, forty PFAS compounds were reported in the analysis. Concentrations from eight specific PFAS compounds were extracted from the dataset and evaluated individually because there are currently state and/or federal criteria for these compounds in groundwater and/or drinking water, and because they have been the subject of the most research to date. Those eight compounds include HFPO-DA (Gen X), PFBS, PFBA, PFHxS, PFHxA, PFNA, PFOS, and PFOA.

3.2 Summed Compounds

Concentrations of each of the previously identified eight individual compounds were summed ("sum of 8 compounds") to represent another point of comparison between sample locations. Concentrations of each of the reported PFAS compounds were also summed ("Total PFAS") to represent the total magnitude of measured and reported PFAS in the samples.

3.3 Family Groups and Subgroups

Data were also aggregated further to compute and compare total concentrations of specific PFAS family groups/subgroups described below. Classification of PFAS into specific family groups/subgroups is primarily based on shared chemical structure characteristics. PFAS within these groups tend to act similarly and by assessing them together, scientists may be able to better determine sources and the potential impacts. More general PFAS information and information about each of the families of PFAS can be found on the Interstate Technology and Regulatory Council (ITRC) webpage, under their Available Resources heading (www.itrcweb.org/PFAS).

Perfluoroalkyl carboxylic acids (PFCAs): PFCAs are one of two major subgroups of perfluoroalkyl acids (PFAAs), and one of the most commonly researched PFAS (ITRC, 2020). PFAAs do not degrade under ambient conditions and are called terminal PFAS or terminal transformation products. PFCAs are grouped together based on a shared chemical structure: a chain of two or more fully fluorinated carbon atoms (the "tail") connected to a carboxylic acid group (the "head"). PFCAs in particular are commercially used as surfactants and are manufactured through Electrochemical Fluorination (ECF) or fluorotelomerization (ITRC, 2023). The most frequently detected PFCA is PFOA (NEMA, 2022).

Perfluoroalkyl sulfonic acids (PFSAs): PFSAs are the second of two major subgroup of PFAAs, and one of the most commonly researched PFAS (ITRC, 2020). PFAAs do not degrade under ambient conditions and are called terminal PFAS or terminal

transformation products. PFSAs are grouped together based on a shared chemical structure: a chain of two or more fully fluorinated carbon atoms (the "tail") connected to a sulfonic acid group (the "head"). PFSAs in particular are commercially used as surfactants and manufactured by ECF. The most frequently detected PFSA is PFOS (NEMA, 2022).

Fluorotelomer sulfonic acids (FTSAs): FTSAs are polyfluoroalkyl substances produced through the fluorotelomerization process (ITRC, 2023). Polyfluoroalkyl substances, unlike perfluoroalkyl substances, do not contain fully fluorinated chains of carbon atoms in the "tail". Instead, some of the carbon atoms in the "tail" of polyfluoroalkyl substances are more weakly connected to hydrogen atoms. FTSAs contain a sulfonic acid "head" group and are examples of PFAS precursors that may degrade or transform into terminal PFAS in the environment. FTSAs are especially prone to degradation at the weak carbon-to-hydrogen bonds in the "tail". The transformation of fluorotelomer-based substances is a potential source of PFCAs in the environment (ITRC, 2020). FTSAs are commonly detected at sites where Aqueous Film-Forming Foam (AFFF) is a primary source, in wastewater treatment plant (WWTP) effluent, and in landfill leachate (NEMA, 2022).

Perfluorooctane sulfonamides (FOSAs): FOSAs are a subgroup of the family of fully fluorinated perfluoroalkane sulfonamides (FASAs) which are used as raw material to make surfactants and surface treatment/protection products. They are also products and intermediates of the ECF process (ITRC, 2020). FASAs, including FOSA, can be precursors and can transform into PFAAs such as PFOS. (NEMA, 2022).

Perfluorooctane sulfonamidoacetic acids (FOSAAs): FOSAAs are a subgroup of the family of Perfluoroalkane Sulfonamido Substances. Although Perfluoroalkane Sulfonamido Substances have fully fluorinated carbon chain "tails", these compounds are considered polyfluoroalkyl substances because some carbon atoms in the "head" group are bonded to hydrogen atoms. FOSAAs are Perfluoroalkane Sulfonamido Substances that contain acetic acid as the "head" group. FOSAAs can be raw materials for the production of surfactant and surface treatment products (ITRC, 2020). They are also typically present as intermediate environmental transformation products of other PFAS compounds (NEMA, 2022).

Perfluorooctane sulfonamide ethanols (FOSEs): FOSEs are also a subgroup of the family of Perfluoroalkane Sulfonamido Substances. FOSEs have similar chemical structures to FOSAAs except that FOSEs contain ethanol as the "head" group instead of acetic acid. FOSEs can be raw materials for the production of surfactant and surface treatment products (ITRC, 2020). They are also typically present as intermediate transformation products of other PFAS compounds (NEMA, 2022).

Per- and Polyfluoroether carboxylic acids (PFECAs): PFECAs are a combined subgroup of per- and polyfluoroalkyl ether acids that each contain a carboxylic acid "head". These compounds were "developed as replacements for other PFAS that have been phased out of production and use (e.g. GenX or ADONA)" (ITRC, 2020). They are surfactants and polymerization aids used in production of other products.

Ether sulfonic acids (ESAs): ESAs are another combined subgroup of per- and polyfluoroalkyl ether acids that each contain a sulfonic acid "head" and include some fluoropolymer polymerization aids "developed as replacements for other PFAS" (ITRC,

2020). ESAs include some fluoropolymer polymerization aids that were developed to replace PFOS (NEMA, 2022).

Fluorotelomer carboxylic acids (FTCAs): FTCAs are a subgroup of polyfluoroalkyl substances that are produced by the fluorotelomerization process (ITRC, 2023) and contain carboxylic acid "head" groups. FTCAs can be biotransformation products of fluorotelomer alcohols, which are used to make plastics. Some FTCAs are present in carpet and therefore may end up in landfill leachates (NEMA, 2022).

To make identification of different family groups easier, a standardized color scheme was generated by the DNREC team that is carried throughout this evaluation and data display (e.g. all PFCAs are colored a shade of green; all PFSAs are colored a shade of blue). The graphical data were arranged into these family groups.

3.4 Family Group and Subgroups Signatures

Building on the previous aggregation of data into family groups and subgroups, DNREC's data evaluation technique calculates the percent contribution of each of the nine family group and subgroups to the total measured PFAS concentration for each sample. This represents a sort of "family group signature," which removes any bias caused by the magnitude of PFAS concentrations, directing focus to the chemical makeup of each sample instead. This evaluation could allow DNREC scientists to determine whether a source of PFAS might be present within a media source is contributing to a localized concentration of a particular family group elsewhere, even if the detected concentrations are not at a significant concentration.

3.5 Comparison to Existing Criteria

DNREC's intentions with this study were to identify the impacts of the disposal of PFAS laden effluent and its movement from the application area. This assessment was not conducted to evaluate human health or ecological risk from exposure to PFAS compounds, or to make any final conclusions about disposal methods. Additional human health and ecological risk characterization were not conducted and presented as part of this study because there are very few established criteria for PFAS compounds to provide adequate perspective. More importantly, the improper interpretation and application of criteria can lead to incorrect conclusions.

It is important, however, to have some context for framing the data presented in this data summary report. To ensure that all evaluators of this data are comparing information consistently, below are the existing criteria that have been established and adopted by the USEPA and the State of Delaware at the time of report publication. Close attention should be paid to the description of how the criteria are meant to be applied and what exceedances of the criteria represent.

3.6 USEPA Drinking Water Standards

As more research and understanding of the impacts of PFAS occur, the Drinking Water Standards are likely to be modified. The most current standards can be found from USEPA at https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas. As of July 2024, the standards are as follows:

Compound	Maximum Contaminant Level (MCL)
PFOA	4 ng/L (ppt)
PFOS	4 ng/L (ppt)
PFNA	10 ng/L (ppt)
PFHxS	10 ng/L (ppt)
HFPO-DA	10 ng/L (ppt)
Mixture of two or more: PFNA, PFHxS, HFPO-DA, and PFBS	Hazard Index of 1

Table 1. USEPA Drinking Water Standards.

Maximum Contaminant Levels (MCLs) for drinking water are established under the USEPA National Primary Drinking Water Regulations (USEPA, 2009). MCLs for several PFAS compounds were set by the USEPA in April 2024 (USEPA, 2024a). These criteria are applicable to finished drinking water only (after treatment) in regulated public drinking water systems, and not to "raw" water samples collected from a surface water body or from groundwater. The MCLs for PFNA, PFHxS, PFBS and/or HFPO-DA are to be combined and used in the calculation of a Hazard Index as noted on EPAs website (USEPA, 2024b) to determine if an exceedance of the criterion has occurred.

3.7 HSCA Screening Levels for Groundwater and Soil

As more research and understanding of the impacts of PFAS occur the Hazardous Substance Cleanup Act (HSCA) standards for groundwater and soil are likely to be modified. The most current standards can be found from DNREC at

https://documents.dnrec.delaware.gov/dwhs/remediation/HSCA-Screening-Level-Table-Guidance.pdf. As of July 2024, the standards are as follows:

Compound	HSCA Gro		HSCA Soil Screenin Value					
	ug/L (ppb)	ng/L (ppt)	mg/kg (ppm)	ug/kg (ppt)				
Hexafluoropropylene oxide dimer acid (HFPO-DA)	0.006	6	0.023	23				
Perfluorobutanesulfonic acid (PFBS)	0.6	600	1.9	1900				
Perfluorobutanoic acid (PFBA)	1.8	1800	7.8	7800				
Perfluorohexanesulfonic acid (PFHxS)	0.039	39	0.13	130				
Perfluorohexanoic acid (PFHxA)	0.61	610	3.2	3200				
Perfluorononanoic acid (PFNA)	0.0059	5.9	0.019	19				
Perfluorooctanesulfonic acid (PFOS)	0.004	4	0.013	13				
Perfluorooctanoic acid (PFOA)	0.006	6	0.019	19				

Table 2. HSCA Screening Levels as of July 2024

Per the aforementioned document, the screening levels "should be used for screening purposes only for the protection of human health and the environment. The screening levels are not to be construed as site specific clean up levels. The HSCA Screening Level Table combines background, risk-based and regulatory values in soil, groundwater, soil gas, sediment, and surface water. The screening levels should be used to determine the contaminants of potential concern (COPCs) in the HSCA risk assessment process." Further, "The screening levels for groundwater are primarily based on the EPA [Regional Screening Levels] RSLs for tap water. When the EPA RSL for tap water exceeds the Delaware or Federal Maximum Contaminant Level (MCL) for drinking water, then the MCL replaces the RSL as the screening level." (DNREC, 2023b).

To reiterate, an exceedance of any value in the HSCA screening level table only means that the compound should be retained for further risk assessment as defined by DNREC regulations and guidance and is applicable only to sites that are being regulated under Delaware's HSCA program.

3.8 QA/QC Samples

Duplicate samples, equipment blanks, field blanks and trip blanks were collected throughout this and other PFAS studies conducted by Division of Water (DW) and its contractor. Due to the combined sampling schemes, fully separating out Quality Control (QC) data for this study would be confusing for the reader and of minimal value. The complete dataset with QC data is available on request and will be included in the DW comprehensive PFAS report later in 2024. Results from all but one equipment and field blank samples were below the MDL. Data associated with the single equipment blank that showed a detection were included in this report for reference, only (Table 10).

4. Results

Results are graphically and tabularly shown in this section. In the graphs, values that were below the method detection limit (MDL) where entered as 0.0, and any values greater than the MDL, but below the reporting limit (RL) where used for graphing purposes. The data table follows, with values above the RL highlighted in green and values between the MDL and RL in beige. All other values correspond to the MDL. The tables present the analytical results from each media source, excluding duplicate samples, for each of the 40 reported PFAS compounds.

All sampling was done by a DNREC approved contractor. The samples were shipped to Eurofins Sacramento for analysis using USEPA Method 537M for surface water samples or USEPA Method 1633 for all other samples. All sampling plans, Standard Operation Procedures, Quality Assurance Program and Projects Plans are on file and available for public review. (https://dnrec.delaware.gov/waste-hazardous/remediation/pfas/)

In the first-round groundwater samples from domestic wells, PFAS was detected in JTPW-2 with PFOA concentration of 3.2 ng/L, close to the USEPA MCL of 4 ng/L. The decision was made to resample the well and the second-round sample showed a PFOA concentration of 5.7 ng/L above the EPA MCL of 4 ng/L (Figure 13). The property owner was contacted by DNREC and the free installation of a PFAS treatment unit was offered.

4.1 Sampling Timetable

Source	Code	Date	Note
Effluent	JT-EF1	7/19/2023	
Effluent	JT-EF2	10/11/2023	
Effluent	JT-EF3	1/23/2024	
Effluent	JT-EF4	4/15/2024	
Groundwater	JT-GW10234-1	7/11/2023	
Groundwater	JT-GW50018-1	7/11/2023	
Groundwater	JT-GW78710-1		Not Sampled
Groundwater	JT-GW10234-2	10/18/2023	
Groundwater	JT-GW10237-2	10/18/2023	
Groundwater	JT-GW50018-2	10/18/2023	
Groundwater	JT-GW78710-2	10/18/2023	
Groundwater	JT-GW91988-2	10/18/2023	
Groundwater	JT-GW10234-3	1/10/2024	
Groundwater	JT-GW50018-3	1/10/2024	
Groundwater	JT-GW10237-3	1/11/2024	
Groundwater	JT-GW78710-3	1/11/2024	
Groundwater	JT-GW91988-3	1/11/2024	
Groundwater	JT-GW10234-4	4/23/2024	
Groundwater	JT-GW10237-4	4/23/2024	
Groundwater	JT-GW50018-4	4/23/2024	
Groundwater	JT-GW78710-4	4/23/2024	
Groundwater	JT-GW91988-4	4/23/2024	
Soil	JT-SL1a	7/17/2023	1' depth
Soil	JT-SL1b	7/17/2023	3' depth
Soil	JT-SL1c	7/17/2023	6' depth
Soil	JT-SL2a	7/17/2023	1' depth
Soil	JT-SL2b	7/17/2023	3'depth
Lagoon Sediment	PSJT-SD1	4/16/2024	0-6" depth
Lagoon Sediment	PSJT-SD2	4/16/2024	0-6" depth
Lagoon Sediment	PSJT-SD3	4/16/2024	0-6" depth
Surface Water	JT-SWP1-1PS	4/19/2024-4/26/2024	
Surface Water	JT-SWP2-1PS	4/19/2024-4/26/2024	
Surface Water	JT-SWP3-1PS	4/19/2024-4/26/2024	
Surface Water	JT-SWP4-1PS	4/19/2024-4/26/2024	
Surface Water	JT-SWP5-1PS	4/19/2024-4/26/2024	
Production well	JT-Plant	4/23/2024	
Private Well	JT PW - 1	1/17/2024	
Private Well	JT PW - 2	1/17/2024	
Private Well	JT PW - 3	1/17/2024	
Private Well	JT PW - 4	1/17/2024	
Private Well	JT PW - 2	4/23/2024	

Table 3. Dates of sampling

4.2 Total PFAS and Sum of 8 PFAS

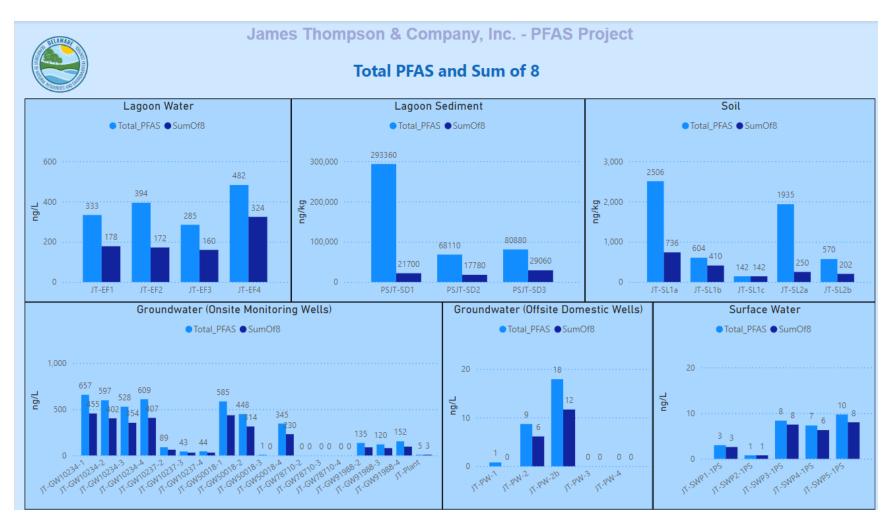


Figure 6. Total PFAS and Sum of 8 PFAS data are presented for all samples grouped by sample source. *Note: In cases, the plots are shown at different scales.*

4.3 PFAS Family Groups and Subgroups

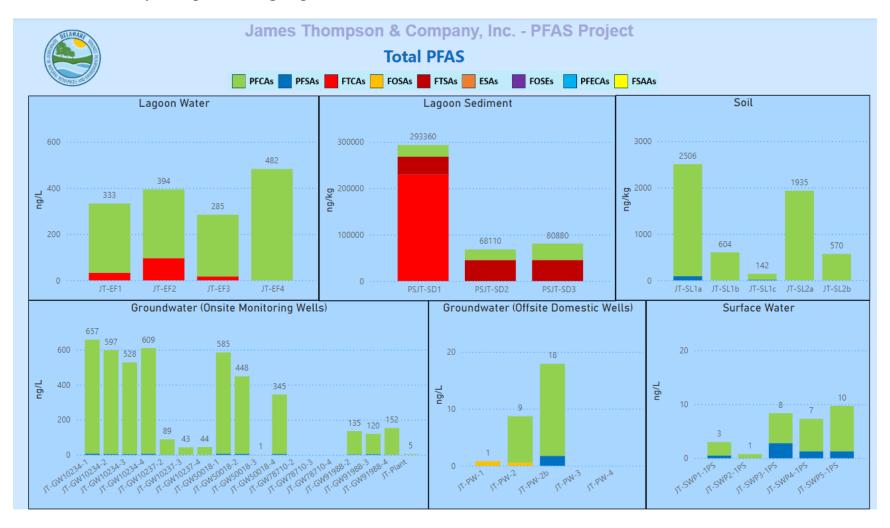


Figure 7. The distribution of PFCAs, PFSAs, FTSAs, FOSAs, FOSAs, PFECAs, ESAs and FTCAs across all samples. *Note: In some cases, the plots are shown at different scales.*

4.4 PFAS Signatures

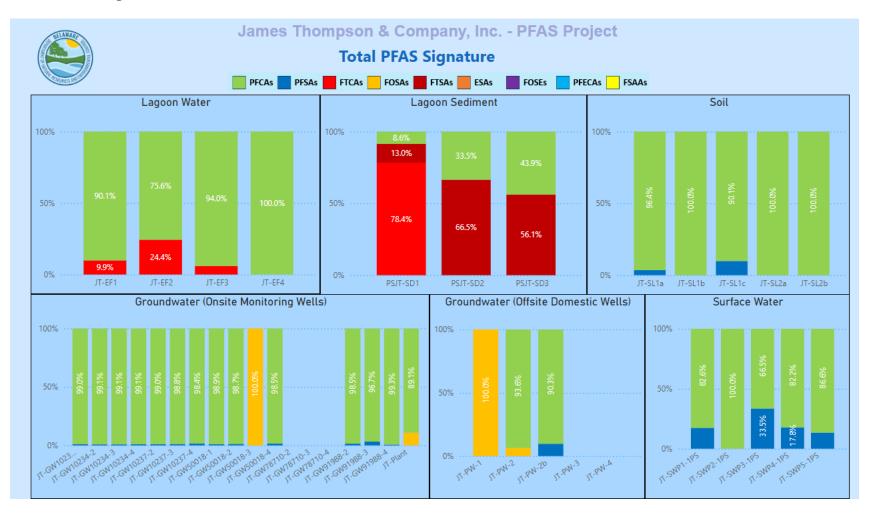


Figure 8. PFAS Family Group Signature as described in Section 2.4.4.

4.5 Lagoon Water



Figure 9. Distribution of HFPO-DA (Gen X), PFBS, PFBA, PFHxS, PFHxA, PFNA, PFOS, and PFOA, (if present) for samples of the lagoon water, considered effluent for this study. *Note: In some cases, the plots are shown at different scales.*

Client ID Lab Sample ID Sampling Date Matrix Dilution Factor Unit		-	JT-EFI 0-284806-: 7/20/2023 Water 1 ng/I	12		JT-EF2 0-290393-1 0/11/2023 Water 1 ng/l	4		JT-EF3 50-297095- 1/23/2024 Water 1 ng/l		JT-EF4 460-302417-16 4/15/2024 Water 1 ng/l			
LCMS-DRAFT 1633-WATER WATER BY DRAFT 1633	CAS#	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	
11Cl-PF3OUdS	763051-92-9	1.64	U	1.64	4.00	U	4.00	1.92	U	1.92	2.03	U	2.03	
3:3 FTCA	356-02-5	1.72	U	1.72	5.00	U	5.00	2.41	U	2.41	2.54	U	2.54	
4,8-Dioxa-3H-perfluorononanoic acid (ADONA)	919005-14-4	3.34	U	3.34	4.00	U	4.00	1.92	U	1.92	2.03	U	2.03	
4:2 FTS	757124-72-4	3.3	U	3.3	4.00	U	4.00	1.92	U	1.92	2.03	U	2.03	
5:3 FTCA	914637-49-3	11.1	U	11.1	25.00	U	25.00	12	U	12	12.7	U	12.7	
6:2 FTS	27619-97-2	2.14	U	2.14	4.00	U	4.00	1.92	U	1.92	2.03	U	2.03	
7:3 FTCA	812-70-4	33.1	J	13.1	96.40	J	25.00	17.1	J	12	12.7	U	12.7	
8:2 FTS	39108-34-4	2.82	U	2.82	4.00	U	4.00	1.92	U	1.92	2.03	U	2.03	
9CI-PF3ONS	756426-58-1	1.51	U	1.51	4.00	U	4.00	1.92	U	1.92	2.03	U	2.03	
HFPO-DA (GenX)	13252-13-6	3.7	U	3.7	4.00	U	4.00	1.92	U	1.92	2.03	U	2.03	
NEtFOSA	4151-50-2	0.73	U	0.73	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
NEtFOSAA	2991-50-6	1.11	U	1.11	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
NEtFOSE	1691-99-2	3.72	U	3.72	10.00	U	10.00	4.81	U	4.81	5.08	U	5.08	
NFDHA	151772-58-6	1.26	U	1.26	2.00	U	2.00	0.96	U	0.96	1.02	U	1.02	
NMeFOSA	31506-32-8	0.91	U	0.91	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
NMeFOSAA	2355-31-9	1.47	U	1.47	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
NMeFOSE	24448-09-7	4.66	U	4.66	10.00	U	10.00	4.81	U	4.81	5.08	U	5.08	
Perfluorobutanesulfonic acid (PFBS)	375-73-5	0.58	U	0.58	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluorobutanoic acid (PFBA)	375-22-4	6.81	J	1.88	7.03	J	4.00	4.9	J	1.92	10.1		2.03	
Perfluorodecanesulfonic acid (PFDS)	335-77-3	0.66	U	0.66	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluorodecanoic acid (PFDA)	335-76-2	83.7		1.62	75.30		1.00	63.8		0.48	79.9		0.51	
Perfluorododecanesulfonic acid (PFDoS)	79780-39-5	0.86	U	0.86	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluorododecanoic acid (PFDoA)	307-55-1	2.07	J	1.21	1.59	J	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluoroheptanesulfonic acid (PFHpS)	375-92-8	0.79	U	0.79	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluoroheptanoic acid (PFHpA)	375-85-9	29.8		1	33.40		1.00	31.9		0.48	56.4		0.51	
Perfluorohexanesulfonic acid (PFHxS)	355-46-4	0.79	U	0.79	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluorohexanoic acid (PFHxA)	307-24-4	16.7		0.91	15.60		1.00	12.9		0.48	23.5		0.51	
Perfluorononanesulfonic acid (PFNS)	68259-12-1	0.8	U	0.8	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluorononanoic acid (PFNA)	375-95-1	13		1.31	20.00		1.00	15.8		0.48	30.3		0.51	
Perfluorooctanesulfonamide (FOSA)	754-91-6	0.69	U	0.69	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluorooctanesulfonic acid (PFOS)	1763-23-1	0.88	U	0.88	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluorooctanoic acid (PFOA)	335-67-1	141		0.73	129.00		1.00	126		0.48	260		0.51	
Perfluoropentanesulfonic acid (PFPeS)	2706-91-4	0.7	U	0.7	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluoropentanoic acid (PFPeA)	2706-90-3	1.1	U	1.1	9.63		2.00	8.3		0.96	13.1		1.02	
Perfluorotetradecanoic acid (PFTeA)	376-06-7	1.11	U	1.11	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluorotridecanoic acid (PFTrDA)	72629-94-8	0.96	U	0.96	1.00	U	1.00	0.48	U	0.48	0.51	U	0.51	
Perfluoroundecanoic acid (PFUnA)	2058-94-8	6.78		1.22	5.90		1.00	4.28		0.48	8.84		0.51	
PFEESA	113507-82-7	1.46	U	1.46	2.00	U	2.00	0.96	U	0.96	1.02	U	1.02	
PFMBA	863090-89-5	1.22	U	1.22	2.00	U	2.00	0.96	U	0.96	1.02	U	1.02	
PFMPA	377-73-1	1.16	U	1.16	2.00	U	2.00	0.96	U	0.96	1.02	U	1.02	

J: Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

identification of the analyte has some degree of uncertainty. However, analyst judgment was used to positively identify the analyte

Table 4. Analytical results of lagoon water samples for all 40 compounds with qualifiers and MDLS. *Note: Values above RL highlighted in green and values above MDL highlighted in beige.*

U : Indicates the analyte was analyzed for but not detected.

Z: Data contains important qualifier codes see hardcopy report and report narrative for further details.

The "Z" qualifier means the transition mass ratio for the indicated analyte was above/below the established ratio limits. The qualitative

4.6 Soil

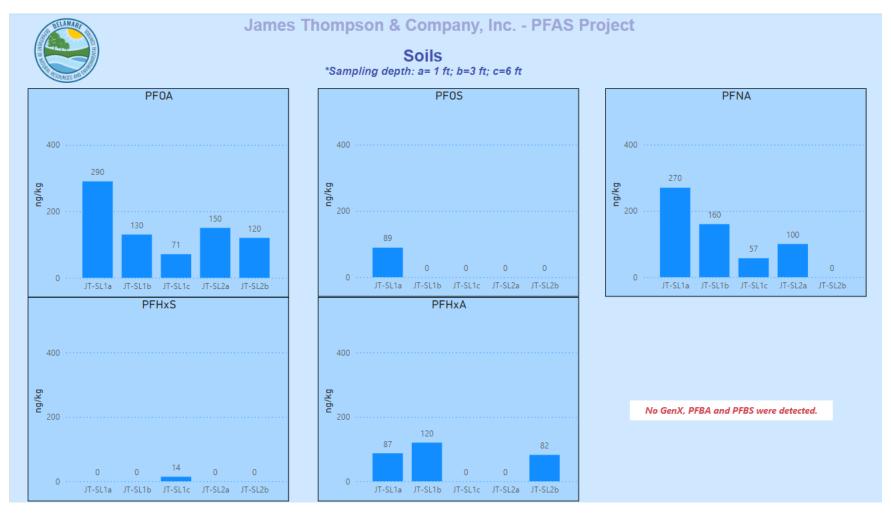


Figure 10. Distribution of HFPO-DA (Gen X), PFBS, PFBA, PFHxS, PFHxA, PFNA, PFOS, and PFOA (if present) for samples in soil samples from spray fields.

Client ID Lab Sample ID Sampling Date	46	-SL1a (1 f 0-284589 7/17/2023	18	46	Γ-SL1b (3 f 60-284589 7/17/2023	-19	46	-SL1c (6 ft 0-284589- 7/17/2023	20	46	-SL2a (1 fi 0-284589- 7/17/2023	·16	JT-SL2b (3 ft.) 460-284589-17 7/17/2023				
Matrix			Soil			Soil			Soil			Soil			Soil		
Dilution Factor			1			1			1			1			1		
Unit			ug/kg			ug/kg			ug/kg			ug/kg		ug/kg			
LCMS-DRAFT 1633-SOIL	CAS#	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	
SOIL BY DRAFT 1633									_			_			_		
11Cl-PF3OUdS	763051-92-9	0.28	U	0.28	0.28	U	0.28	0.28	U	0.28	0.28	U	0.28	0.28	U	0.28	
3:3 FTCA	356-02-5	0.28	U	0.28	0.28	U	0.28	0.28	U	0.28	0.28	U	0.28	0.28	U	0.28	
4,8-Dioxa-3H-perfluorononanoic acid (ADONA)	919005-14-4	0.19	U	0.19	0.18	U	0.18	0.18	U	0.18	0.19	U	0.19	0.19	U	0.19	
4:2 FTS	757124-72-4	0.31	U	0.31	0.31	U	0.31	0.31	U	0.31	0.31	U	0.31	0.31	U	0.31	
5:3 FTCA	914637-49-3	0.73	U	0.73	0.73	U	0.73	0.72	U	0.72	0.74	U	0.74	0.74	U	0.74	
6:2 FTS	27619-97-2	0.14	U	0.14	0.14	U	0.14	0.14	U	0.14	0.14	U	0.14	0.14	U	0.14	
7:3 FTCA	812-70-4	0.98	U	0.98	0.98	U	0.98	0.96	U	0.96	0.99	UZ	0.99	0.99	U	0.99	
8:2 FTS	39108-34-4	0.11	U	0.11	0.11	U	0.11	0.1	U	0.1	0.11	U	0.11	0.11	U	0.11	
9CI-PF3ONS	756426-58-1	0.23	U	0.23	0.23	U	0.23	0.23	U	0.23	0.23	U	0.23	0.24	U	0.24	
HFPO-DA (GenX)	13252-13-6	0.21	U	0.21	0.21	U	0.21	0.21	U	0.21	0.21	U	0.21	0.22	U	0.22	
NEtFOSA	4151-50-2	0.051	U	0.051	0.05	U	0.05	0.05	U	0.05	0.051	U	0.051	0.051	U	0.051	
NEtFOSAA	2991-50-6	0.053	U	0.053	0.053	U	0.053	0.052	U	0.052	0.053	U	0.053	0.054	U	0.054	
NEtFOSE	1691-99-2	0.12	U	0.12	0.12	U	0.12	0.12	U	0.12	0.12	U	0.12	0.12	U	0.12	
NFDHA	151772-58-6	0.11	U	0.11	0.11	U	0.11	0.11	U	0.11	0.11	U	0.11	0.11	U	0.11	
NMeFOSA	31506-32-8	0.092	U	0.092	0.091	U	0.091	0.09	U	0.09	0.092	U	0.092	0.093	U	0.093	
NMeFOSAA	2355-31-9	0.099	U	0.099	0.099	U	0.099	0.097	U	0.097	0.1	U	0.1	0.1	U	0.1	
NMeFOSE	24448-09-7	0.4	U	0.4	0.39	U	0.39	0.39	U	0.39	0.4	U	0.4	0.4	U	0.4	
Perfluorobutanesulfonic acid (PFBS)	375-73-5	0.03	U	0.03	0.029	U	0.029	0.029	U	0.029	0.03	U	0.03	0.03	U	0.03	
Perfluorobutanoic acid (PFBA)	375-22-4	0.14	U	0.14	0.14	U	0.14	0.13	U	0.13	0.14	U	0.14	0.14	U	0.14	
Perfluorodecanesulfonic acid (PFDS)	335-77-3	0.056	U	0.056	0.056	U	0.056	0.055	U	0.055	0.056	U	0.056	0.057	U	0.057	
Perfluorodecanoic acid (PFDA)	335-76-2	0.62		0.13	0.14	J	0.13	0.12	U	0.12	0.64		0.13	0.2		0.13	
Perfluorododecanesulfonic acid (PFDoS)	79780-39-5	0.058	U	0.058	0.058	U	0.058	0.057	U	0.057	0.058	U	0.058	0.059	U	0.059	
Perfluorododecanoic acid (PFDoA)	307-55-1	0.3		0.11	0.11	U	0.11	0.11	U	0.11	0.27		0.11	0.11	U	0.11	
Perfluoroheptanesulfonic acid (PFHpS)	375-92-8	0.042	U	0.042	0.042	U	0.042	0.041	U	0.041	0.042	U	0.042	0.042	U	0.042	
Perfluoroheptanoic acid (PFHpA)	375-85-9	0.11	J	0.042	0.054	J	0.042	0.041	U	0.041	0.045	J	0.042	0.058	J	0.043	
Perfluorohexanesulfonic acid (PFHxS)	355-46-4	0.015	U	0.015	0.015	U	0.015	0.014	J	0.014	0.015	U	0.015	0.015	U	0.015	
Perfluorohexanoic acid (PFHxA)	307-24-4	0.087	J	0.057	0.12	J	0.057	0.056	U	0.056	0.057	U	0.057	0.082	J	0.057	
Perfluorononanesulfonic acid (PFNS)	68259-12-1	0.062	U	0.062	0.062	U	0.062	0.061	U	0.061	0.062	U	0.062	0.063	U	0.063	
Perfluorononanoic acid (PFNA)	375-95-1	0.27		0.057	0.16	J	0.057	0.057	J	0.056	0.1	J	0.058	0.058	U	0.058	
Perfluorooctanesulfonamide (FOSA)	754-91-6	0.096	U	0.096	0.096	U	0.096	0.094	U	0.094	0.096	U	0.096	0.097	U	0.097	
Perfluorooctanesulfonic acid (PFOS)	1763-23-1	0.089	J	0.041	0.04	U	0.04	0.04	U	0.04	0.041	U	0.041	0.041	U	0.041	
Perfluorooctanoic acid (PFOA)	335-67-1	0.29		0.044	0.13	J	0.044	0.071	J	0.044	0.15	J	0.045	0.12	J	0.045	
Perfluoropentanesulfonic acid (PFPeS)	2706-91-4	0.025	U	0.025	0.025	U	0.025	0.024	U	0.024	0.025	U	0.025	0.025	U	0.025	
Perfluoropentanoic acid (PFPeA)	2706-90-3	0.07	U	0.07	0.07	U	0.07	0.069	U	0.069	0.071	U	0.071	0.071	U	0.071	
Perfluorotetradecanoic acid (PFTeA)	376-06-7	0.15	J	0.055	0.055	U	0.055	0.054	U	0.054	0.13	J	0.055	0.056	U	0.056	
Perfluorotridecanoic acid (PFTrDA)	72629-94-8	0.22		0.04	0.039	U	0.039	0.039	U	0.039	0.31		0.04	0.11	j	0.04	
Perfluoroundecanoic acid (PFUnA)	2058-94-8	0.37		0.1	0.1	U	0.1	0.098	U	0.098	0.29		0.1	0.1	U	0.1	
PFEESA	113507-82-7	0.053	U	0.053	0.053	U	0.053	0.052	U	0.052	0.053	U	0.053	0.053	U	0.053	
PFMBA	863090-89-5	0.05	U	0.05	0.05	U	0.05	0.049	U	0.049	0.05	U	0.05	0.051	U	0.051	
PFMPA	377-73-1	0.086	U	0.086	0.085	U	0.085	0.084	Ü	0.084	0.086	U	0.086	0.086	U	0.086	

J: Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Table 5. Analytical results of soil samples for all 40 compounds with qualifiers and MDLS. *Note: Values above RL highlighted in green and values above MDL highlighted in beige.*

U : Indicates the analyte was analyzed for but not detected.

Z : Data contains important qualifier codes see hardcopy report and report narrative for further details.

The "2" qualifier means the transition mass ratio for the indicated analyte was above/below the established ratio limits. The qualitative identification of the analyte has some degree of uncertainty. However, analyst judgment was used to positively identify the analyte

4.7 Groundwater from Onsite Monitoring Wells

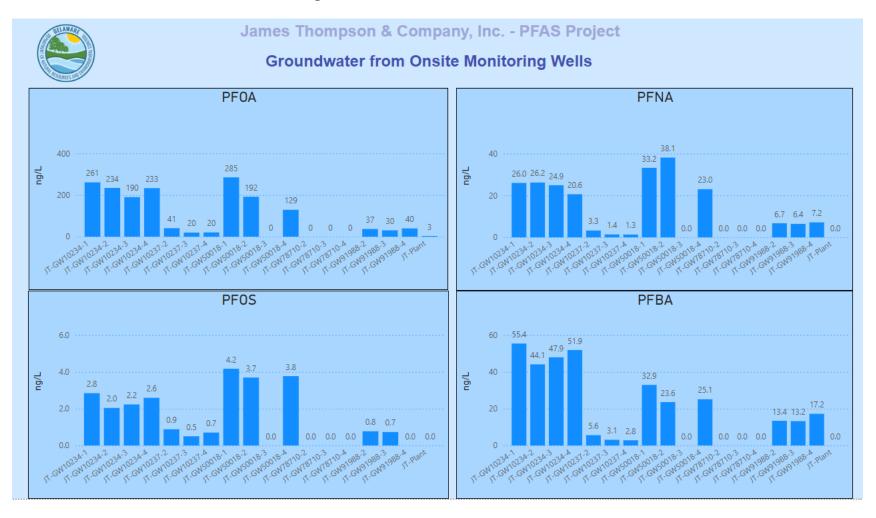


Figure 11. Distribution of HFPO-DA (Gen X), PFBS, PFBA, PFHxS, PFHxA, PFNA, PFOS, and PFOA (if present) for onsite groundwater samples from the monitoring wells and the facility production well. *Note: In some cases, the plots are shown at different scales.*



Figure 12. Distribution of HFPO-DA (Gen X), PFBS, PFBA, PFHxS, PFHxA, PFNA, PFOS, and PFOA (if present) for onsite groundwater samples from the monitoring wells and the facility production well. *Note: In some cases, the plots are shown at different scales.*

Client ID Lab Sample ID		4	- GW10234 60-284097-	8	41	JT-GW50018-1 460-284097-9 7/11/2023 10:11			Γ-GW10234 60-290913-	21	4	T-GW50018	23	4	Γ-GW10237 50-290913-	27	46	- GW78710 50-290913-	24	JT-GW91988-2 460-290913-22 10/18/2023 10:00				
Sampling Date Matrix		//	11/2023 9: Water	14	//1	.1/2023 10 Water	:11	10	/18/2023 8 Water	:55	10,	/18/2023 1: Water	1:00	10/	/18/2023 12 Water	2:50	10/18/2023 11:55 Water			10/18/2023 10:00 Water				
Dilution Factor			1			1			1			1		1				1			1			
Unit			ng/l			ng/l			ng/l			ng/l		ng/l				ng/l		ng/I				
LCMS-DRAFT 1633-WATER						-																		
WATER BY DRAFT 1633	CAS#	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL		
11CI-PF3OUdS	763051-92-9	0.76	U	0.76	0.72	- 11	0.72	1.82	- 1	1.82	1.81	- 1	1.81	1.8	U	1.8	1.84	- 11	1.84	1.75	- 11	1.75		
3:3 FTCA	356-02-5	0.8	U		0.75	- 11	0.75	2.27	- 11	2.27	2.26	ı	2.26	2.24	U		2.3	- 11		2.19	II	2.19		
4,8-Dioxa-3H-perfluorononanoic acid (ADONA)	919005-14-4	1.55	U		1.46	U	1.46	1.82	IJ	1.82	1.81		1.81	1.8	U		1.84	IJ		1.75	U	1.75		
4:2 FTS	757124-72-4	1.53	U		1.44	U	1.44	1.82	IJ	1.82	1.81		1.81	1.8	U		1.84	IJ		1.75	U	1.75		
5:3 FTCA	914637-49-3	5.15	U		4.85	U	4.85	11.4	U	11.4	11.3		11.3	11.2	U		11.5	U	_	11	U	11		
6:2 FTS	27619-97-2	1	U		0.94	U	0.94	1.82	U	1.82	1.81		1.81	1.8	U		1.84	U	_	1.75	U	1.75		
7:3 FTCA	812-70-4	6.07	U	6.07	5.72	U	5.72	11.4	U	11.4	11.3		11.3	11.2	U		11.5	U		11	U	11		
8:2 FTS	39108-34-4	1.31	U		1.23	U	1.23	1.82	U	1.82	1.81		1.81	1.8	U		1.84	U		1.75	U	1.75		
9CI-PF3ONS	756426-58-1	0.7	U		0.66	U	0.66	1.82	U	1.82	1.81		1.81	1.8	U	_	1.84	U		1.75	U	1.75		
HFPO-DA (GenX)	13252-13-6	1.72	U	1.72	1.62	U	1.62	1.82	U	1.82	1.81	Ū	1.81	1.8	U		1.84	U		1.75	U	1.75		
NEtFOSA	4151-50-2	0.34	U		0.32	U	0.32	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U		0.44	U	0.44		
NEtFOSAA	2991-50-6	0.52	U	0.52	0.49	U	0.49	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
NEtFOSE	1691-99-2	1.73	U	1.73	1.63	U	1.63	4.54	U	4.54	4.52	U	4.52	4.49	U	4.49	4.6	U	4.6	4.38	U	4.38		
NFDHA	151772-58-6	0.59	U	0.59	0.55	U	0.55	0.91	U	0.91	0.9	U	0.9	0.9	U	0.9	0.92	U	0.92	0.88	U	0.88		
NMeFOSA	31506-32-8	0.42	U	0.42	0.4	U	0.4	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
NMeFOSAA	2355-31-9	0.68	U	0.68	0.64	U	0.64	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
NMeFOSE	24448-09-7	2.17	U	2.17	2.04	U	2.04	4.54	U	4.54	4.52	U	4.52	4.49	U	4.49	4.6	U	4.6	4.38	U	4.38		
Perfluorobutanesulfonic acid (PFBS)	375-73-5	2.91		0.27	1.55	J	0.25	2.53		0.45	1.59		0.45	0.45	U	0.45	0.46	U	0.46	1.25	J	0.44		
Perfluorobutanoic acid (PFBA)	375-22-4	55.4		0.88	32.9		0.82	44.1		1.82	23.6		1.81	5.58		1.8	1.84	U	1.84	13.4		1.75		
Perfluorodecanesulfonic acid (PFDS)	335-77-3	0.31	U	0.31	0.29	U	0.29	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
Perfluorodecanoic acid (PFDA)	335-76-2	0.75	U	0.75	10		0.71	0.45	U	0.45	12.8		0.45	0.68	1	0.45	0.46	U	0.46	0.44	U	0.44		
Perfluorododecanesulfonic acid (PFDoS)	79780-39-5	0.4	U	0.4	0.38	U	0.38	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
Perfluorododecanoic acid (PFDoA)	307-55-1	0.56	U	0.56	0.53	U	0.53	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
Perfluoroheptanesulfonic acid (PFHpS)	375-92-8	0.37	U	0.37	0.35	U	0.35	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
Perfluoroheptanoic acid (PFHpA)	375-85-9	136		0.47	98.6		0.44	134		0.45	90.9		0.45	15.9		0.45	0.46	U	0.46	26.8		0.44		
Perfluorohexanesulfonic acid (PFHxS)	355-46-4	0.66	J	0.37	0.52	J	0.34	0.56	J	0.45	0.48		0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
Perfluorohexanoic acid (PFHxA)	307-24-4	106		0.42	78		0.4	92.6		0.45	54.4		0.45	11.3		0.45	0.46	U	0.46	29		0.44		
Perfluorononanesulfonic acid (PFNS)	68259-12-1	0.37	U	0.37	0.35	U	0.35	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
Perfluorononanoic acid (PFNA)	375-95-1	26		0.61	33.2		0.58	26.2		0.45	38.1		0.45	3.25		0.45	0.46	U	0.46	6.72		0.44		
Perfluorooctanesulfonamide (FOSA)	754-91-6	0.32	U	0.32	0.3	U	0.3	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
Perfluorooctanesulfonic acid (PFOS)	1763-23-1	2.84	Z	0.41	4.17	Z	0.39	2.04		0.45	3.69		0.45	0.88	1	0.45	0.46	U	0.46	0.77	J	0.44		
Perfluorooctanoic acid (PFOA)	335-67-1	261		0.34	285		0.32	234		0.45	192		0.45	40.6		0.45	0.46	U	0.46	36.7		0.44		
Perfluoropentanesulfonic acid (PFPeS)	2706-91-4	0.33	U	0.33	0.31	U	0.31	0.45	U	0.45	0.45		0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
Perfluoropentanoic acid (PFPeA)	2706-90-3	66.2		0.51	41.2		0.48	61.4		0.91	30.6		0.9	10.4		0.9	0.92	U	0.92	20.7		0.88		
Perfluorotetradecanoic acid (PFTeA)	376-06-7	0.52	U	0.52	0.49	U	0.49	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
Perfluorotridecanoic acid (PFTrDA)	72629-94-8	0.44	U	0.44	0.42	U	0.42	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
Perfluoroundecanoic acid (PFUnA)	2058-94-8	0.57	U	0.57	0.53	U	0.53	0.45	U	0.45	0.45	U	0.45	0.45	U	0.45	0.46	U	0.46	0.44	U	0.44		
PFEESA	113507-82-7	0.68	U	0.68	0.64	U	0.64	0.91	U	0.91	0.9	_	0.9	0.9	U	0.9	0.92	U	0.92	0.88	U	0.88		
PFMBA	863090-89-5	0.57	U	0.57	0.53	U	0.53	0.91	U	0.91	0.9		0.9	0.9	U		0.92	U	0.92	0.88	U	0.88		
PFMPA	377-73-1	0.54	U	0.54	0.51	U	0.51	0.91	U	0.91	0.9	U	0.9	0.9	U	0.9	0.92	U	0.92	0.88	U	0.88		

J : Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

identification of the analyte has some degree of uncertainty. However, analyst judgment was used to positively identify the analyte

Table 6. Analytical results of onsite monitoring well groundwater samples and production well for all 40 compounds with qualifiers and MDLs. Note: *Values above RL highlighted in green and values above MDL highlighted in beige*.

U : Indicates the analyte was analyzed for but not detected.

Z : Data contains important qualifier codes see hardcopy report and report narrative for further details.

The "Z" qualifier means the transition mass ratio for the indicated analyte was above/below the established ratio limits. The qualitative

Client ID	_	JT-GW:	10234-3		JT-GW50018-3		JT-GW10237-3			JT-GW78710-3			,	IT-GW91988	-3		JT-GW10234-	4	JT-GW50018-4			JT-GW10237-4			JT-GW78710-4			JT-GW91988-4		
Lab Sample ID		460-29	6551-17		160-296551	16	460-296551-19 460-296551-			-23	4	160-296551-	20		460-302900-1	19	46	302900-	18	460-302900-20			4	60-302900-	12	460-30	02900-13			
Sampling Date		1/10/20	24 14:35	1	/10/2024 13	3:50	1	1/11/2024 9	9:10	1	/11/2024 10	0:50	1	/11/2024 9:	55		4/23/2024 11:	55	4/2	3/2024 11	:15	4/:	23/2024 12:2	15	4	/23/2024 8:	45	4/23/2	2024 9:25	
Matrix		Wa	iter		Water			Water			Water			Water			Water			Water			Water			Water		W	/ater	
Dilution Factor			1		1			1			1			1			1			1			1			1			1	
Unit		ng	g/I		ng/l			ng/l			ng/I			ng/l			ng/l			ng/I			ng/l			ng/l		r	ng/I	
LCMS-DRAFT 1633-WATER	CAS#				_			_			_			_			Result O						_			_				
WATER BY DRAFT 1633	CAS#	Result 0	Q MI	OL Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL		Result Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q MD	
11CI-PF3OUdS	763051-92-9	1.9	U	1.9 1.9	e t	1.9	1.89	U	1.89	1.9	e L	1.9	1.89	U U	1.89	19	2.11 U	2.11	2.07	U	2.07	2.07	U	2.07	2.08	U	2.08	2.07	U	
3:3 FTCA	356-02-5	2.37	U	2.37 2.3	3 (2.38	2.37	- L	2.37	2.37	7 L	2.37	2.36	. U	2.36	16	2.63 U	2.63	2.59	U	2.59	2.59	U	2.59	2.6	U	2.6	2.58	U	
4,8-Dioxa-3H-perfluorononanoic acid (ADONA)	919005-14-4	1.9	U	1.9 1.5		1.9	1.89	U	1.89	1.9	L	1.9	1.89	U	1.89	19	2.11 U	2.11	2.07	U	2.07	2.07	U	2.07	2.08	U	2.08	2.07	U	
4:2 FTS	757124-72-4	1.9	U	1.9 1.9		1.9	1.89	U	1.89	1.9	e L	1.9	1.89	U	1.89	19	2.11 U	2.11	2.07	U	2.07	2.07	U	2.07	2.08	U	2.08	2.07	U	
5:3 FTCA	914637-49-3	11.8	U	11.8 11.9		11.9	11.8	L.	11.8	11.8	3 L	11.8	11.8	3 U	11.8	.8	13.2 U	13.2	12.9	U	12.9	12.9	U	12.9	13	U	13	12.9	U	
6:2 FTS	27619-97-2	1.9	U	1.9 1.5		1.9	1.89	U	1.89	1.9	L	1.9	1.89	U	1.89	19	2.11 U	2.11	2.07	U	2.07	2.07	U	2.07	2.08	U	2.08	2.07	U	
7:3 FTCA	812-70-4	11.8	U	11.8 11.5	9 (11.9	11.8	U	11.8	11.8	3 .	11.8	11.8	3 U	11.8	.8	13.2 U	13.2	12.9	U	12.9	12.9	U	12.9	13	U	13	12.9	U	
8:2 FTS	39108-34-4	1.9	U	1.9 1.5		1.9	1.89	U	1.89	1.9) L	1.9	1.89	U	1.89	19	2.11 U	2.11	2.07	U	2.07	2.07	U	2.07	2.08	U	2.08	2.07	U	
9CI-PF3ONS	756426-58-1	1.9	U	1.9 1.9		1.9	1.89	U	1.89	1.9) L	1.9	1.89	U	1.89	19	2.11 U	2.11	2.07	U	2.07	2.07	U	2.07	2.08	U	2.08	2.07	U	
HFPO-DA (GenX)	13252-13-6	1.9	U	1.9 1.5	e t	1.9	1.89	U	1.89	1.9	e L	1.9	1.89	U	1.89	19	2.11 U	2.11	2.07	U	2.07	2.07	U	2.07	2.08	U	2.08	2.07	U	
NEtFOSA	4151-50-2	0.47	U	0.47 0.4	3 (0.48	0.47	U	0.47	0.47	7	0.47	0.47	7 U	0.43		0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
NEtFOSAA	2991-50-6	0.47	U	0.47 0.44	3 (0.48	0.47	U	0.47	0.47	7 L	0.47	0.47	7 U	0.47	17	0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
NEtFOSE	1691-99-2	4.74	U	4.74 4.70	5 L	4.76	4.74	U	4.74	4.74	1 L	4.74	4.73	B U	4.73	13	5.27 U	5.27	5.18	U	5.18	5.17	U	5.17	5.19	U	5.19	5.17	U	
NFDHA	151772-58-6	0.95	U	0.95 0.99	5 (0.95	0.95	U	0.95	0.95	i L	0.95	0.95	U	0.95	15	1.05 U	1.05	1.04	U	1.04	1.03	U	1.03	1.04	U	1.04	1.03	U	
NMeFOSA	31506-32-8	0.47	U	0.47 0.44	3 (0.48	0.47	U	0.47	0.47	7 L	0.47	0.47	7 U	0.47	17	0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
NMeFOSAA	2355-31-9	0.47	U	0.47 0.44	3 (0.48	0.47	U	0.47	0.47	7 L	0.47	0.47	7 U	0.47	17	0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	UZ	0.52	0.52	U Z	
NMeFOSE	24448-09-7	4.74	U	4.74 4.7	5 (4.76	4.74	U	4.74	4.74	ı ı	4.74	4.73	B U	4.73	13	5.27 U	5.27	5.18	U	5.18	5.17	U	5.17	5.19	U	5.19	5.17	U	
Perfluorobutanesulfonic acid (PFBS)	375-73-5	1.75	J	0.47 0.44	3 (0.48	0.47	U	0.47	0.47	7 L	0.47	2.67	Z Z	0.47	17	2.45	0.53	1.56	J	0.52	0.52	U	0.52	0.52	U	0.52	1.07	J	
Perfluorobutanoic acid (PFBA)	375-22-4	47.9		1.9 1.5	9 (1.9	3.08		1.89	1.9	e L	1.9	13.2	2	1.89		51.9	2.11	25.1		2.07	2.83	J	2.07	2.08	U	2.08	17.2		
Perfluorodecanesulfonic acid (PFDS)	335-77-3	0.47	U	0.47 0.48	3 (0.48	0.47	U	0.47	0.47	7 L	J 0.47	0.47	7 U	0.47	17	0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
Perfluorodecanoic acid (PFDA)	335-76-2	0.69	J	0.47 0.48	3 (0.48	0.82		0.47	0.47	7 L	0.47	0.47	7 U	0.47		0.75 J	0.53	11.4		0.52	1.42	JZ	0.52	0.52	UZ	0.52	0.52	UZ	
Perfluorododecanesulfonic acid (PFDoS)	79780-39-5	0.47	U	0.47 0.48	3 (0.48	0.47	U	0.47	0.47	7 L	0.47	0.47	7 U	0.47	17	0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
Perfluorododecanoic acid (PFDoA)	307-55-1	0.47		0.47 0.48		0.48	0.47	U	0.47	0.47		0.47	0.47		0.47		0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
Perfluoroheptanesulfonic acid (PFHpS)	375-92-8	0.47	U	0.47 0.48	3 (0.48	0.47	U	0.47	0.47	7 L	J 0.47	0.47	7 U	0.47	17	0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
Perfluoroheptanoic acid (PFHpA)	375-85-9	117		0.47 0.48	3 (0.48	7.99		0.47	0.47	7 L	0.47	24.8	3	0.47	17	134	0.53	75.8		0.52	7.72		0.52	0.52	U	0.52	32.2		
Perfluorohexanesulfonic acid (PFHxS)	355-46-4	0.58		0.47 0.4		0.48	0.47	U	0.47	0.47		J 0.47	0.5		0.47		0.72 J	0.53	0.52	U Z	0.52	0.52	U	0.52	0.52	UZ	0.52	0.52	UZ	
Perfluorohexanoic acid (PFHxA)	307-24-4	86.2		0.47 0.4	3 (0.48	5.51		0.47	0.47	7 L	J 0.47	25.2	2	0.47		95.7	0.53	47.9		0.52	5.37		0.52	0.52	U	0.52	31		
Perfluorononanesulfonic acid (PFNS)	68259-12-1	0.47	_	0.47 0.48	_	0.48	0.47	U	0.47	0.47	_	0.47	0.47	_	0.47	_	0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
Perfluorononanoic acid (PFNA)	375-95-1	24.9		0.47 0.48		0.48	1.39		0.47	0.47		0.47	6.42		0.47		20.6	0.53	23		0.52	1.33	J	0.52	0.52	U	0.52	7.15		
Perfluorooctanesulfonamide (FOSA)	754-91-6	0.47	U	0.47 0.69		0.48	0.47	U	0.47	0.47		0.47	0.47	7 U	0.47		0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
Perfluorooctanesulfonic acid (PFOS)	1763-23-1	2.23		0.47 0.4		0.48	0.5		0.47	0.47		J 0.47	0.73		0.47		2.59 Z	0.53	3.77		0.52	0.7	JZ	0.52	0.52	U	0.52	0.52	U	
Perfluorooctanoic acid (PFOA)	335-67-1	190	_	0.47 0.48		0.48			0.47	0.47		0.47	30.4		0.47		233	0.53	129		0.52	20.4		0.52	0.52	U	0.52	39.5		
Perfluoropentanesulfonic acid (PFPeS)	2706-91-4	0.47		0.47 0.48		0.48	0.47	U	0.47	0.47		0.47	0.47		0.47		0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
Perfluoropentanoic acid (PFPeA)	2706-90-3	56.5		0.95 0.95		0.95	4.08		0.95	0.95		0.95	15.7		0.95		67.4	1.05	27.4		1.04	4.61		1.03	1.04	U	1.04	24.3		
Perfluorotetradecanoic acid (PFTeA)	376-06-7	0.47		0.47 0.48	_	0.48	0.47	U	0.47	0.47		J 0.47	0.47		0.47		0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
Perfluorotridecanoic acid (PFTrDA)	72629-94-8	0.47	_	0.47 0.4	_	0.48	0.47	U	0.47	0.47	_	0.47	0.47	_	0.47	_	0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
Perfluoroundecanoic acid (PFUnA)	2058-94-8	0.47		0.47 0.4		0.48	0.47	U	0.47	0.47		J 0.47	0.47		0.43		0.53 U	0.53	0.52	U	0.52	0.52	U	0.52	0.52	U	0.52	0.52	U	
PFEESA	113507-82-7	0.95		0.95 0.95		0.95	0.95	U	0.95	0.95		0.95	0.95		0.95		1.05 U	1.05	1.04	U	1.04	1.03	U	1.03	1.04	U	1.04	1.03	U	
PFMBA	863090-89-5	0.95		0.95 0.99		0.95	0.95	U	0.95	0.95		0.95	0.95		0.95		1.05 U	1.05	1.04	U	1.04	1.03	U	1.03	1.04	U	1.04	1.03	U	
PFMPA	377-73-1	0.95	U	0.95 0.99	i t	0.95	0.95	U	0.95	0.95	i L	0.95	0.95	5 U	0.95	5	1.05 U	1.05	1.04	U	1.04	1.03	U	1.03	1.04	U	1.04	1.03	U	

J: Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Table 7. Analytical results of onsite monitoring well groundwater samples and production well for all 40 compounds with qualifiers and MDLs (continued). Note: Values above RL highlighted in green and values above MDL highlighted in beige.

U : Indicates the analyte was analyzed for but not detected.

Z : Data contains important qualifier codes see hardcopy report and report narrative for further details.

The "Z" qualifier means the transition mass ratio for the indicated analyte was above/below the established ratio limits. The qualitative identification of the analyte has some degree of uncertainty. However, analyst judgment was used to positively identify the analyte

4.8 Groundwater from Offsite Domestic Wells

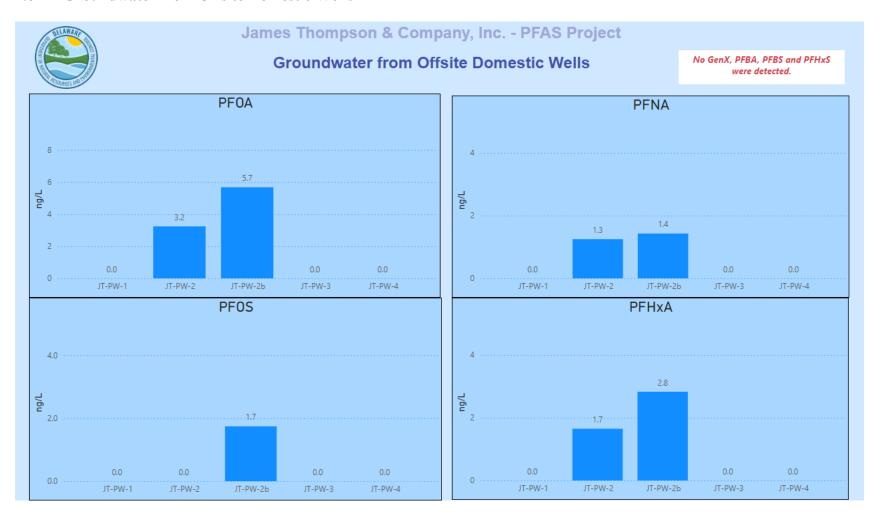


Figure 13. Distribution of HFPO-DA (Gen X), PFBS, PFBA, PFHxS, PFHxA, PFNA, PFOS, and PFOA (if present) for groundwater samples from offsite domestic wells. *Note: In some cases, the plots are shown at different scales.*

Client ID Lab Sample ID Sampling Date Matrix Dilution Factor Unit		4	JT PW - 1 60-296611- 17/2024 10: Water 1 ng/l	-		JT PW - 2 160-296611-4 17/2024 10: Water 1 ng/l		41	JT PW - 3 60-296611- 17/2024 11 Water 1 ng/l	-		JT PW - 4 60-296611- 17/2024 11: Water 1 ng/l		JT-PW-2b 460-302900-17 4/23/2024 10:40 Water 1 ng/l			
LCMS-DRAFT 1633-WATER WATER BY DRAFT 1633	CAS#	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL	
11CI-PF3OUdS	763051-92-9	2.12	U	2.12	2.03	U	2.03	2.03	U	2.03	1.99	U	1.99	2.05	U	2.05	
3:3 FTCA	356-02-5	2.65	U		2.54	U	2.54	2.54	U		2.49	U		2.56	U	2.56	
4,8-Dioxa-3H-perfluorononanoic acid (ADONA)	919005-14-4	2.12	U	2.12	2.03	U	2.03	2.03	U	2.03	1.99	U	1.99	2.05	U	2.05	
4:2 FTS	757124-72-4	2.12	U	2.12	2.03	U	2.03	2.03	U	2.03	1.99	U	1.99	2.05	U	2.05	
5:3 FTCA	914637-49-3	13.3	U	13.3	12.7	U	12.7	12.7	U	12.7	12.4	U	12.4	12.8	U	12.8	
6:2 FTS	27619-97-2	2.12	U	2.12	2.03	U	2.03	2.03	U	2.03	1.99	U	1.99	2.05	U	2.05	
7:3 FTCA	812-70-4	13.3	U	13.3	12.7	U	12.7	12.7	U	12.7	12.4	U	12.4	12.8	U	12.8	
8:2 FTS	39108-34-4	2.12	U	2.12	2.03	U	2.03	2.03	U	2.03	1.99	U	1.99	2.05	U	2.05	
9CI-PF3ONS	756426-58-1	2.12	U	2.12	2.03	U	2.03	2.03	U	2.03	1.99	U	1.99	2.05	U	2.05	
HFPO-DA (GenX)	13252-13-6	2.12	U	2.12	2.03	U	2.03	2.03	U	2.03	1.99	U	1.99	2.05	U	2.05	
NEtFOSA	4151-50-2	0.53	U	0.53	0.51	U	0.51	0.51	U	0.51	0.5	U	0.5	0.51	U	0.51	
NEtFOSAA	2991-50-6	0.53	U	0.53	0.51	U	0.51	0.51	U	0.51	0.5	U	0.5	0.51	U	0.51	
NEtFOSE	1691-99-2	5.31	U	5.31	5.07	U	5.07	5.08	U	5.08	4.98	U	4.98	5.11	U	5.11	
NFDHA	151772-58-6	1.06	U	1.06	1.01	U	1.01	1.02	U	1.02	1	U	1	1.02	U	1.02	
NMeFOSA	31506-32-8	0.53	U	0.53	0.51	U	0.51	0.51	U	0.51	0.5	U	0.5	0.51	U	0.51	
NMeFOSAA	2355-31-9	0.53	U	0.53	0.51	U	0.51	0.51	U	0.51	0.5	U	0.5	0.51	U	0.51	
NMeFOSE	24448-09-7	5.31	U	0.0-	5.07	U	5.07	5.08	U		4.98		4.98	5.11	U	5.11	
Perfluorobutanesulfonic acid (PFBS)	375-73-5	0.53	U		0.51	U	0.51	0.51	U		0.5		0.5	0.51	U	0.51	
Perfluorobutanoic acid (PFBA)	375-22-4	2.12	U	2.12	2.03	U	2.03	2.03	U		1.99		1.99	2.05	U	2.05	
Perfluorodecanesulfonic acid (PFDS)	335-77-3	0.53	U	0.53	0.51	U	0.51	0.51	U	0.0-	0.5		0.5	0.51	U	0.51	
Perfluorodecanoic acid (PFDA)	335-76-2	0.53	U		0.51	U	0.51	0.51	U		0.5		0.5	0.8	J	0.51	
Perfluorododecanesulfonic acid (PFDoS)	79780-39-5	0.53	U	0.53	0.51	U	0.51	0.51	U	0.0-	0.5	U	0.5	0.51	U	0.51	
Perfluorododecanoic acid (PFDoA)	307-55-1	0.53	U	0.53	0.51	U	0.51	0.51	U	0.0.	0.5	U	0.5	0.51	U	0.51	
Perfluoroheptanesulfonic acid (PFHpS)	375-92-8	0.53	U	0.53	0.51	U	0.51	0.51	U	0.0-	0.5	U	0.5	0.51	U	0.51	
Perfluoroheptanoic acid (PFHpA)	375-85-9	0.53	U	0.53	2	J	0.51	0.51	U	0.51	0.5		0.5	2.78		0.51	
Perfluorohexanesulfonic acid (PFHxS)	355-46-4	0.53	U	0.53	0.51	U	0.51	0.51	U	0.0.	0.5		0.5	0.51	U	0.51	
Perfluorohexanoic acid (PFHxA)	307-24-4	0.53	U	0.53	1.65	J	0.51	0.51	U	0.51	0.5		0.5	2.83		0.51	
Perfluorononanesulfonic acid (PFNS)	68259-12-1	0.53	U	0.53	0.51	U	0.51	0.51	U		0.5	U	0.5	0.51	U	0.51	
Perfluorononanoic acid (PFNA)	375-95-1	0.53	U	0.53	1.25	J	0.51	0.51	U		0.5		0.5	1.43	J	0.51	
Perfluorooctanesulfonamide (FOSA)	754-91-6	0.79	J	0.53	0.56	J	0.51	0.51	U		0.5	U	0.5	0.51	U	0.51	
Perfluorooctanesulfonic acid (PFOS)	1763-23-1	0.53	U		0.51	U	0.51	0.51	U		0.5			1.74	JΖ	0.51	
Perfluorooctanoic acid (PFOA)	335-67-1	0.53	U		3.24		0.51	0.51	U		0.5		0.5	5.68		0.51	
Perfluoropentanesulfonic acid (PFPeS)	2706-91-4	0.53	U	0.00	0.51	U	0.51	0.51	U		0.5		0.5	0.51	U	0.51	
Perfluoropentanoic acid (PFPeA)	2706-90-3	1.06	U		1.01	U	1.01	1.02	U		1	U	1	2.65	J	1.02	
Perfluorotetradecanoic acid (PFTeA)	376-06-7	0.53	U	0.53	0.51	U	0.51	0.51	U		0.5		0.5	0.51	U	0.51	
Perfluorotridecanoic acid (PFTrDA)	72629-94-8	0.53	U	0.00	0.51	U	0.51	0.51	U		0.5		0.5	0.51	U	0.51	
Perfluoroundecanoic acid (PFUnA)	2058-94-8	0.53	U	0.53	0.51	U	0.51	0.51	U		0.5		0.5	0.51	U	0.51	
PFEESA	113507-82-7	1.06	U	1.06	1.01	U	1.01	1.02	U		1	U	1	1.02	U	1.02	
PFMBA	863090-89-5	1.06	U	1.06	1.01	U	1.01	1.02	U		1	U	1	1.02	U	1.02	
PFMPA	377-73-1	1.06	U	1.06	1.01	U	1.01	1.02	U	1.02	1	U	1	1.02	U	1.02	

J: Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Table 8. Analytical results of domestic well groundwater samples for all 40 compounds with qualifiers and MDLs. *Note: Values above RL highlighted in green and values above MDL highlighted in beige.*

U : Indicates the analyte was analyzed for but not detected.

Z: Data contains important qualifier codes see hardcopy report and report narrative for further details.

The "Z" qualifier means the transition mass ratio for the indicated analyte was above/below the established ratio limits. The qualitative

identification of the analyte has some degree of uncertainty. However, analyst judgment was used to positively identify the analyte

4.9 Surface Water Samples



Figure 14. Distribution of HFPO-DA (Gen X), PFBS, PFBA, PFHxS, PFHxA, PFNA, PFOS, and PFOA (if present) for surface water samples.

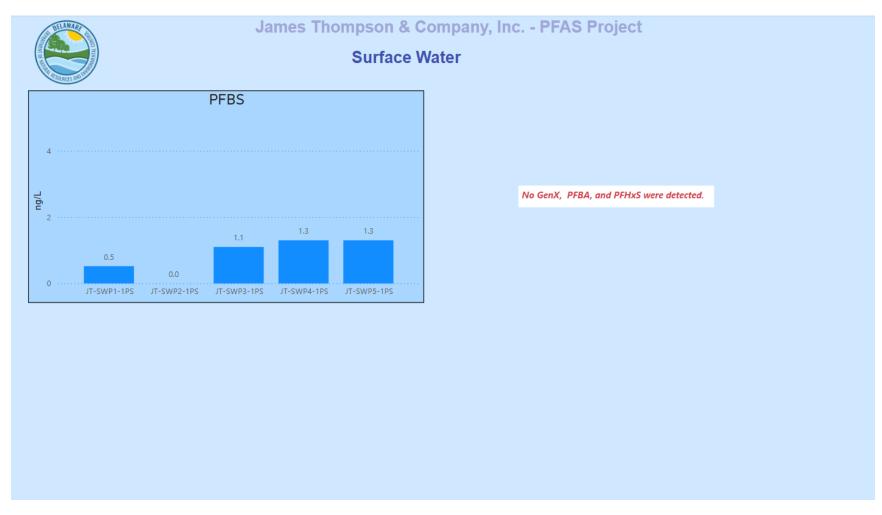


Figure 15. Distribution of HFPO-DA (Gen X), PFBS, PFBA, PFHxS, PFHxA, PFNA, PFOS, and PFOA (if present) for surface water samples.

Client ID	J	JT-SWP1-1PS		JT-SWP2-1PS			JT-SWP3-1PS			JT-SWP4-1PS			JT-SWP5-1PS			Duplicate 1PS		
Analyte	Result	Qualifier	MDL	Result	Qualifier	Qualifier MDL		Qualifier	MDL	Result	Qualifier	MDL	Result	Qualifier		Result	Qualifier	MDL
Alldlyte	(ng/L)		(ng/L)	(ng/L)	Qualifier	(ng/L)	(ng/L)	Qualifier	(ng/L)	(ng/L)	Qualifier	(ng/L)	(ng/L)	Qualifier	(ng/L)	(ng/L)	Qualifier	(ng/L)
Perfluorobutanoic acid (PFBA)	ND	Н	2.6	ND	Н	2.8	ND	Н	2.7	ND	Н	2.6	ND	Н	2.6	ND	Н	2.5
Perfluoropentanoic acid (PFPeA)	ND	Н	0.53	ND	Н	0.59	1.3	JH	0.56	ND	Н	0.53	1.2	JH	0.52	ND	Н	0.52
Perfluorohexanoic acid (PFHxA)	0.77	JH	0.62	0.77	JH	0.71	1.7	JH	0.67	1.9	JH	0.65	2.3	Н	0.63	0.78	JH	0.62
Perfluoroheptanoic acid (PFHpA)	0.4	JH	0.27	ND	Н	0.32	0.86	JH	0.3	1	JΗ	0.28	1.7	JH	0.27	0.63	JH	0.27
Perfluorooctanoic acid (PFOA)	1.3	JH	0.94	ND	Н	1.1	2.3	JH	1	3.1	Н	0.96	3.8	Н	0.92	1.5	JH	0.91
Perfluorononanoic acid (PFNA)	ND	Н	0.3	ND	Н	0.36	0.7	JH	0.33	ND	Н	0.31	0.61	JH	0.3	ND	Н	0.3
Perfluorodecanoic acid (PFDA)	ND	Н	0.35	ND	Н	0.42	ND	Н	0.38	ND	Н	0.36	ND	Н	0.35	ND	Н	0.34
Perfluoroundecanoic acid (PFUnA)	ND	Н	1.2	ND	Н	1.5	ND	Н	1.3	ND	Н	1.2	ND	Н	1.2	ND	Н	1.2
Perfluorododecanoic acid (PFDoA)	ND	Н	0.64	ND	Н	0.78	ND	Н	0.72	ND	Н	0.66	ND	Н	0.64	ND	Н	0.62
Perfluor otridecanoic acid (PFTrDA)	ND	Н	1.6	ND	Н	2.1	ND	Н	1.7	ND	Н	1.7	ND	Н	1.5	ND	Н	1.5
Perfluorotetradecanoic acid (PFTeA)	ND	Н	1.1	ND	Н	1.6	ND	Н	1.4	ND	Н	1.2	ND	Н	1.1	ND	Н	1
Perfluorobutanesulfonic acid (PFBS)	0.52	JH	0.21	ND	Н	0.24	1.1	JH	0.23	1.3	JH	0.22	1.3	JH	0.22	0.27	JΗ	0.21
Perfluoropentanesulfonic acid (PFPeS)	ND	Н	0.32	ND	Н	0.36	ND	Н	0.34	ND	Н	0.33	ND	Н	0.32	ND	Н	0.32
Perfluorohexanesulfonic acid (PFHxS)	ND	Н	0.62	ND	Н	0.72	ND	Н	0.67	ND	Н	0.63	ND	Н	0.62	ND	Н	0.61
Perfluoroheptanesulfonic acid (PFHpS)	ND	Н	0.21	ND	Н	0.25	ND	Н	0.23	ND	Н	0.22	ND	Н	0.21	ND	Н	0.21
Perfluorooctanesulfonic acid (PFOS)	ND	Н	0.59	ND	Н	0.69	1.7	JH	0.64	ND	Н	0.61	ND	Н	0.6	ND	Н	0.58
NMeFOSAA	ND	Н	1.3	ND	Н	1.3	ND	Н	1.2	ND	Н	1.3	ND	Н	1.2	ND	Н	1.2
NEtFOSAA	ND	Н	1.4	ND	Н	1.5	ND	Н	1.3	ND	Н	1.4	ND	Н	1.3	ND	Н	1.3
4:2 FTS	ND	Н	0.26	ND	Н	0.29	ND	Н	0.27	ND	Н	0.26	ND	Н	0.26	ND	Н	0.26
6:2 FTS	ND	Н	2.9	ND	Н	3.6	ND	Н	3.3	ND	Н	3	ND	Н	2.9	ND	Н	2.8
8:2 FTS	ND	Н	0.65	ND	Н	0.89	ND	Н	0.78	ND	Н	0.69	ND	Н	0.65	ND	Н	0.61
HFPO-DA (GenX)	ND	Н	1.6	ND	Н	1.7	ND	Н	1.7	ND	Н	1.6	ND	Н	1.5	ND	Н	1.5
9CI-PF3ONS	ND	Н	0.26	ND	Н	0.31	ND	Н	0.29	ND	Н	0.27	ND	Н	0.27	ND	Н	0.26
11CFPF3OUdS	ND	Н	0.36	ND	Н	0.43	ND	Н	0.39	ND	Н	0.37	ND	Н	0.36	ND	Н	0.35
4,8-Dioxa-3H-perfluorononanoic acid (ADONA)	ND	Н	0.43	ND	Н	0.46	ND	Н	0.43	ND	Н	0.43	ND	Н	0.42	ND	Н	0.41
5:3 FTCA	ND	Н	0.37	ND	Н	0.43	ND	Н	0.4	ND	Н	0.37	ND	Н	0.37	ND	Н	0.36
6:2 FTCA	ND	Н	1	ND	Н	1.2	ND	Н	1.1	ND	Н	1	ND	Н	1	ND	Н	1
6:2 FTUCA	ND	Н	0.62	ND	Н	0.68	ND	Н	0.65	ND	Н	0.63	ND	Н	0.62	ND	Н	0.61
NFDHA	ND	Н	0.67	ND	Н	0.75	ND	Н	0.71	ND	Н	0.68	ND	Н	0.67	ND	Н	0.66
PFM BA	ND	Н	0.28	ND	Н	0.31	ND	Н	0.3	ND	Н	0.28	ND	Н	0.28	ND	Н	0.28
PFM PA	ND	Н	0.29	ND	Н	0.32	ND	Н	0.31	ND	Н	0.3	ND	Н	0.3	ND	Н	0.29
PFEESA	ND	Н	0.31	ND	Н	0.35	ND	Н	0.33	ND	Н	0.31	ND	Н	0.31	ND	Н	0.31
PFM OAA	ND	Н	0.43	ND	Н	0.44	ND	Н	0.42	ND	Н	0.43	ND	Н	0.42	ND	Н	0.42
PF030A	ND	Н	0.94	ND	Н	1	ND	Н	0.97	ND	Н	0.95	ND	Н	0.94	ND	Н	0.93
PFO2HxA	ND	Н	0.57	ND	Н	0.6	ND	Н	0.59	ND	Н	0.58	ND	Н	0.57	ND	Н	0.57
Perfluoropropionic acid	5.2	JH	2.7	5.2	JH	2.9	5.5	JH	2.8	5.2	JH	2.7	5.1	JH	2.7	5.2	JH	2.6
M8 PFOA (PRC)	9.4	Н	0.17	31	Н	0.2	21	Н	0.19	13	Н	0.17	10	Н	0.17	7.3	Н	0.16

Notes

MDL: method detection limit

ND: Not detected at the MDL shown in the third column for each sample.

ng/L: Nanograms per litre

H: Sample was prepped or analyzed beyond the specified holding time. This does not meet regulatory requirements.

J: Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Table 9. Analytical results of surface water samples for all 40 compounds with qualifiers and MDLs. *Note: Values above RL highlighted in green and values above MDL highlighted in beige.*

4.9 Lagoon Sediment



Figure 16. Distribution of HFPO-DA (Gen X), PFBS, PFBA, PFHxS, PFHxA, PFNA, PFOS, and PFOA (if present) for lagoon sediment samples.

Client ID Lab Sample ID Sampling Date Matrix Dilution Factor			PSJT-SD1 460-302415-1 4/16/2024 Solid 1 ug/kg			PSJT-SD2 460-302415-2 4/16/2024 Solid 1 ug/kg			PS:IT-SD3 460-302415-3 4/16/2024 Solid 1 ug/kg				041624 (Bla 50-302415 4/16/2024 Water	-5	EB-041624 (Blank) 460-302415-5 4/16/2024 Water			
													1 ng/l			1 ng/l		
LCMC DRAFT 1622 COII																		
SOIL BY DRAFT 1633	CAS#	Result	Q	MDL	Result	Q	MDL	Result	Q	MDL		Result	Q	MDL	Secondary	Q	MDL	
11CI-PF3OUdS	763051-92-9	12.5	U	12.5	26	U	26	29.8	U	29.8		1.89	U	1.89	NR			
3:3 FTCA	356-02-5	12.4	U	12.4	25.9	U	25.9	29.7	U	29.7		2.37	U	2.37	NR			
4,8-Dioxa-3H-perfluorononanoic acid (ADONA)	919005-14-4	8.7	U	8.7	18.1	U	18.1	20.7	U	20.7		1.89	U	1.89	NR			
4:2 FTS	757124-72-4	8.7	U	8.7	18.1	U	18.1	20.7	U	20.7		1.89	U	1.89	NR			
5:3 FTCA	914637-49-3	73.5	U	73.5	153	U	153	175	U	175		11.8	U	11.8	NR			
6:2 FTS	27619-97-2	38.2	В	8.7	45.3	J B	18.1	45.4	J B	20.7		1.89	U	1.89	NR			
7:3 FTCA	812-70-4	230		80.9	168	U	168	193	U	193		11.8	U	11.8	NR			
8:2 FTS	39108-34-4	8.7	U	8.7	18.1	U	18.1	20.7	U	20.7		1.89	U	1.89	NR			
9CI-PF3ONS	756426-58-1	10.4	U	10.4	21.5	U	21.5	24.7	U	24.7		1.89	U	1.89	NR			
HFPO-DA (GenX)	13252-13-6	9.44	U	9.44	19.6	U	19.6	22.5	U	22.5		1.89	U	1.89	NR			
NEtFOSA	4151-50-2	2.26	U	2.26	4.7	U	4.7	5.39	U	5.39		0.47	U	0.47	NR			
NEtFOSAA	2991-50-6	2.35	U	2.35	4.88	U	4.88	5.6	U	5.6		0.47	U	0.47	NR			
NEtFOSE	1691-99-2	22	U	22	45.8	U	45.8	52.5	U	52.5		4.74	U	4.74	NR			
NFDHA	151772-58-6	4.96	U	4.96	10.3	U	10.3	11.8	U	11.8		0.95	U	0.95	NR			
NMeFOSA	31506-32-8	2.18	U	2.18	4.52	U	4.52	5.19	U	5.19		0.47	U	0.47	NR			
NMeFOSAA	2355-31-9	4.39	U	4.39	9.13	U	9.13	10.5	U	10.5		0.47	U	0.47	NR			
NMeFOSE	24448-09-7	21.8	U	21.8	45.2	U	45.2	51.9	U	51.9		4.74	U	4.74	NR			
Perfluorobutanesulfonic acid (PFBS)	375-73-5	2.18	U	2.18	4.52	U	4.52	5.19	U	5.19		0.47	U	0.47	NR			
Perfluorobutanoic acid (PFBA)	375-22-4	8.7	U	8.7	18.1	U	18.1	20.7	U	20.7		1.89	U	1.89	NR			
Perfluorodecanesulfonic acid (PFDS)	335-77-3	2.48	U	2.48	5.16	U	5.16	5.91	U	5.91		0.47	U	0.47	NR			
Perfluorodecanoic acid (PFDA)	335-76-2	2.39	U	2.39	4.97	U	4.97	5.7	U	5.7		0.47	U	0.47	NR			
Perfluorododecanesulfonic acid (PFDoS)	79780-39-5	2.57	U	2.57	5.34	U	5.34	6.12	U	6.12		0.47	U	0.47	NR			
Perfluorododecanoic acid (PFDoA)	307-55-1	2.18	U	2.18	4.52	U	4.52	5.19	U	5.19		0.47	U	0.47	NR			
Perfluoroheptanesulfonic acid (PFHpS)	375-92-8	2.18	U	2.18	4.52	U	4.52	5.19	U	5.19		0.47	U	0.47	NR			
Perfluoroheptanoic acid (PFHpA)	375-85-9	2.18	U	2.18	4.52	U	4.52	5.19	U	5.19		0.47	U	0.47	NR			
Perfluorohexanesulfonic acid (PFHxS)	355-46-4	2.18	U	2.18	4.52	U	4.52	5.19	U	5.19		0.47	U	0.47	NR			
Perfluorohexanoic acid (PFHxA)	307-24-4	2.52	U	2.52	5.25	U	5.25	6.01	U	6.01		0.47	U	0.47	NR			
Perfluorononanesulfonic acid (PFNS)	68259-12-1	2.74	U	2.74	5.7	U	5.7	6.53	U	6.53		0.47	U	0.47	NR			
Perfluorononanoic acid (PFNA)	375-95-1	16.9	В	2.52	12.4	JB	5.25	20.1	J B	6.01		0.5	J	0.47	0.47	UΖ	0.47	
Perfluorooctanesulfonamide (FOSA)	754-91-6	2.18	U	2.18	4.52	U	4.52	5.19	U	5.19		0.47	U	0.47	NR			
Perfluorooctanesulfonic acid (PFOS)	1763-23-1	2.7	U	2.7	5.61	U	5.61	6.43	U	6.43		0.47	U	0.47	NR			
Perfluorooctanoic acid (PFOA)	335-67-1	4.8	J	2.18	5.38	J	4.52	8.96	J	5.19		0.47	U	0.47	NR			
Perfluoropentanesulfonic acid (PFPeS)	2706-91-4	2.83	U	2.83	5.88	U	5.88	6.74	U	6.74		0.47	U	0.47	NR			
Perfluoropentanoic acid (PFPeA)	2706-90-3	4.35	U	4.35	9.04	U	9.04	10.4	U	10.4		0.95	U	0.95	NR			
Perfluorotetradecanoic acid (PFTeA)	376-06-7	2.44	U	2.44	5.06	U	5.06	5.81	U	5.81		0.47	U	0.47	NR			
Perfluorotridecanoic acid (PFTrDA)	72629-94-8	3.46	J	2.18	4.52	U	4.52	5.19	U	5.19		0.47	U	0.47	NR			
Perfluoroundecanoic acid (PFUnA)	2058-94-8	2.18	U	2.18	5.03	J	4.52	6.42	J	5.19		0.47	U	0.47	NR			
PFEESA	113507-82-7	4.79	U	4.79	9.95	U	9.95	11.4	U	11.4		0.95	U	0.95	NR			
PFMBA	863090-89-5	4.35	U	4.35	9.04	U	9.04	10.4	U	10.4		0.95	U	0.95	NR			
PFMPA	377-73-1	4.35	U	4.35	9.04	U	9.04	10.4	U	10.4		0.95	U	0.95	NR			

Highlighted Concentrations shown in bold type face exceed limits

identification of the analyte has some degree of uncertainty. However, analyst judgment was used to positively identify the analyte

Table 10. Analytical results of lagoon sediment samples for all 40 compounds with qualifiers and MDLs. *Note: Values above RL highlighted in green and values above MDL highlighted in beige.*

B: Compound was found in the blank and sample.

J: Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

U : Indicates the analyte was analyzed for but not detected.

 $^{{\}bf Z:} \ {\bf Data\ contains\ important\ qualifier\ codes\ see\ hard copy\ report\ and\ report\ narrative\ for\ further\ details.}$

 $The \ "Z" \ qualifier \ means \ the \ transition \ mass \ ratio \ for \ the \ indicated \ analyte \ was \ above/below \ the \ established \ ratio \ limits. \ The \ qualitative$

References

- Bogdan D., 2021. Evaluation of PFAS in Influent, Effluent, and Residuals of Wastewater Treatment Plants (WWPTs) in Michigan: Michigan Department of Environment, Great Lakes, and Energy, April 2021 (pp. 119)
- Brunn, H., Arnold, G., Körner, W. et al. PFAS: Forever Chemicals—Persistent, Bioaccumulative and Mobile. Reviewing The Status and The Need For Their Phase Out and Remediation of Contaminated Sites. Environ Sci Eur 35, 20 (2023). https://doi.org/10.1186/s12302-023-00721-8
- DGS 2006. Thickness, Elevation of the Base, and Transmissivity Grids of the Unconfined Aquifer of Sussex County (Data Product No. 06-01)

 https://enterprise.firstmap.delaware.gov/arcgis/rest/services/Geology/DGS UnconfinedAquifer/MapServer Delaware Geological Survey, July 2006.
- DGS 2019. Elevation Contours for Delaware https://enterprise.firstmap.delaware.gov/arcgis/rest/services/Elevation Delaware Geological Survey, April 2019.
- DNREC 2023a Project Design And Sampling Plan PFAS in Wastewater Characterization and Fate https://documents.dnrec.delaware.gov/dwhs/remediation/watar/PFAS-Project-Design-and-Sampling-Plan-Wastewater.pdf April 2023, April 2023.
- DNREC 2023b Hazardous Substance Cleanup Act Screening Level Table Guidance, https://documents.dnrec.delaware.gov/dwhs/remediation/HSCA-Screening-Level-Table-Guidance.pdf DNREC, Division of Waste and Hazardous Substances, Remediation Section, November 2023.
- ITRC. 2020. Per- and Polyfluoroalky Substances (PFAS-1). Washington, D.C. Web-Based Guidance. Interstate Technology & Regulatory Council, PFAS Team www.itrcweb.org
- ITRC. 2023. PFAS Technical and Regulatory Guidance Document and Fact Sheets PFAS-1. Washington, D.C.: Interstate Technology & Regulatory Council, PFAS Team. https://pfas-1.itrcweb.org
- NEMA. 2022. Course materials from PFAS Transformation, Fate and Remediation: Understanding and Managing Per- and Polyfluoroalkyl Substances. HYD-414 Course. National Environmental Management Academy, LLC. September 13-14, 2022.
- NTP 2016. Monograph On Immunotoxicity Associated With Exposure To Perfluorooctanoic Acid (PFOA) Or Perfluorooctane Sulfonate (PFOS) Office of Health Assessment and Translation Division of the National Toxicology Program National Institute of Environmental Health Sciences National Institutes of Health U.S. Department Of Health And Human Services, September, 2016.

- PCWR et. al., 2020. PFAS in Biosolids- A Southern Arizona Case Study: Pima County Wastewater Reclamation, Jacobs Engineering, the University of Arizona, and the National Science Foundation, October 2020 (pp. 32).
- Salim, F. and T. Gorecki, 2019. Theory and modelling approaches to passive sampling, Environ. Sci.: Processes Impacts, 2019, 21(10), 1618–1641.
- Shoemaker, J. and Dan Tettenhorst. Method 537.1 Determination of Selected Per- and Polyflourinated Alkyl Substances in Drinking Water by Solid Phase Extraction and Liquid Chromatography/Tandem Mass Spectrometry (LC/MS/MS). U.S. Environmental Protection Agency, Washington, DC, 2020.
- USDA 1974, Soil Survey of Sussex County Delaware, United States Department of Agriculture, Soil Conservations Service, 1974.
- USEPA. 2009. National Primary Drinking Water Regulations (EPA 816-F-09-004). U.S. Environmental Protection Agency, Office of Ground Water and Drinking Water, May 2009: National Primary Drinking Water Regulations | US EPA.
- USEPA. 2024a. Fact Sheet PFAS National Primary Drinking Water Regulation: https://www.epa.gov/system/files/documents/2024-04/pfas-npdwr_fact-sheet_general_4.9.24v1.pdf.
- USEPA. 2024b. Fact Sheet Understanding the Final PFAS National Primary Drinking Water Regulation Hazzard Index Maximum Contaminant Level:

 https://www.epa.gov/system/files/documents/2024-04/pfas-npdwr_fact-sheet_hazard-index_4.8.24.pdf.