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12  
13 IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

14 THE MOAPA BAND OF PAIUTE )  
INDIANS, a federally recognized Tribe of ) Case No.  
15 Indians, )  
and ) COMPLAINT  
16 SIERRA CLUB, a California non-profit )  
corporation, ) (violations of the Resource Conservation and  
17 Plaintiffs, ) Recovery Act, 42 U.S.C. § 6972(a)(1) (A) and (B),  
and the Clean Water Act, 33 U.S.C. §1365)  
18 vs. )  
19 NEVADA POWER CO., d/b/a NV )  
ENERGY, )  
20 and )  
21 CALIFORNIA DEPARTMENT OF )  
WATER RESOURCES, )  
22 Defendants. )

23  
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1 **COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

2 **INTRODUCTION**

3 1. This is a civil suit for declaratory and injunctive relief against Defendants NV Energy and  
4 the California Department of Water Resources (hereinafter collectively referred to as  
5 “Defendants”) for violations of the Solid Waste Disposal Act, also known as the Resource  
6 Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (“RCRA”), and for violations of the  
7 Federal Water Pollution Control Act (commonly known as the Clean Water Act and hereinafter  
8 referred to as the CWA), 33 U.S.C. §§1251 *et seq.*, at Defendants’ Reid Gardner coal facility in  
9 Moapa, Nevada.

10 2. The action is brought pursuant to the citizen suit provisions of RCRA, 42 U.S.C. §  
11 6972(a)(1) (A) and (B), and the CWA, 33 U.S.C. §1365.

12 3. As detailed below, Plaintiffs allege that Defendants’ past and present handling, storage,  
13 treatment, transportation or disposal of solid and hazardous wastes at the Reid Gardner coal-fired  
14 power plant has contaminated and is contaminating the environment on and off the Reid Gardner  
15 site, including surface water and groundwater.

16 4. Plaintiffs allege that Defendants’ past and present operation of Reid Gardner, including  
17 its wastewater ponds, landfill, coal piles, and the electrical generating plant itself, have caused  
18 ground and surface water contaminant concentrations on and around the site to exceed  
19 requirements under the Safe Drinking Water Act and RCRA standards, requirements and  
20 prohibitions. The past and present handling, storage, treatment, transportation, or disposal of  
21 these coal combustion and related wastes (hereinafter referred to for simplicity as “CCW”)  
22 presents, or may present, an imminent and substantial endangerment to human health and the

1 environment. 42 U.S.C. § 6972(a)(1)(B). Defendants' handling, storage, treatment,  
2 transportation, or disposal of CCW constitutes illegal open dumping, contravening the statutory  
3 standards of RCRA. 42 U.S.C. § 6945(a). Additionally, Defendants' discharges at the facility to  
4 the Muddy River, which flows to Lake Mead, have not been permitted under the CWA, so that  
5 each such discharge violates § 301(a) of the CWA. 33 U.S.C. § 1311(a).

6 5. Neither EPA nor the State of Nevada is diligently prosecuting Defendants under RCRA  
7 or the CWA for their violations described herein.

8 6. Plaintiffs seek, under both RCRA and CWA, temporary and permanent injunctive relief,  
9 remedial relief, the imposition of civil penalties, and the award of costs, including attorney and  
10 expert witness fees.

#### 11 **JURISDICTION AND VENUE**

12 7. This Court has jurisdiction over the subject matter of this action pursuant to sections  
13 7002(a)(1)(A) and (B) of RCRA, 42 U.S.C. § 6972(a)(1)(A) and (B), section 505(a) of the CWA,  
14 33 U.S.C. §1365(a), and pursuant to 28 U.S.C. § 1331, the federal question jurisdiction statute.

15 8. RCRA authorizes citizen suits against "any person...who has contributed or is  
16 contributing to the past or present handling, storage, treatment, transportation, or disposal of any  
17 solid or hazardous waste which may present an imminent and substantial endangerment to health  
18 or the environment." 42 U.S.C. §6972(a)(1)(B). Under RCRA, the court may compel any person  
19 referred to in paragraph (1)(B) "to take such...action as may be necessary" to eliminate the  
20 endangerment. 42 U.S.C. § 6972(a). Additionally, RCRA authorizes citizen suits against any  
21 person "who is alleged to be in violation of any permit, standard, regulation, condition,  
22 requirement, prohibition, or order which has become effective pursuant to this chapter," 42

1 U.S.C. § 6972(a)(1)(A), and authorizes the courts to enforce the requirements, including the  
2 imposition of civil penalties, against persons in violation of such requirements. 42 U.S.C. §  
3 6972(a).

4 9. In addition, this Court has subject matter jurisdiction over the claims specified in this  
5 Complaint pursuant to the CWA, 33 U.S.C. §1365(a), and the relief requested is authorized  
6 pursuant to 33 U.S.C. §§ 1319 and 1365(a).

7 10. This Court also has subject matter jurisdiction over the claims specified in this Complaint  
8 pursuant to 28 U.S.C. §1331, while the relief requested also is authorized pursuant to 28 U.S.C.  
9 §§2201 and 2202.

10 11. Venue is properly vested in this Court pursuant to 42 U.S.C. § 6972(a), because the  
11 action respects alleged violations and alleged endangerment that occurred and may occur in this  
12 judicial district and, pursuant to 33 U.S.C. §1365 (c), because the action respects a violation of  
13 an effluent standard or limitation by a source located in this district.

14 12. All the violations have occurred and will continue to occur around the Reid Gardner  
15 facility in Clark County, Nevada. Pursuant to District of Nevada Local Rule IA 8-1, the Southern  
16 Division – which includes Clark County– is the proper Division for this case.

17 13. Pursuant to the notice requirements of RCRA and CWA, on February 8, 2013, Plaintiffs  
18 sent notice of the ongoing endangerment, open dumping, and unpermitted discharges to the  
19 Administrator of the U.S. Environmental Protection Agency, the U.S. Attorney General, the  
20 Nevada Division of Environmental Protection, and other required notice recipients and  
21 defendants. Plaintiffs’ notice is attached to this Complaint and identified as “Attachment A,”  
22 and Plaintiffs hereby incorporate by reference all details and allegations in the notice letter.

1 14. More than 90 days have passed since Plaintiffs served their RCRA and CWA notice. The  
2 violations complained of in the notice letter are continuing at this time, or are reasonably likely  
3 to continue or reoccur. Neither the U.S. Environmental Protection Agency nor the Nevada  
4 Division of Environmental Protection has commenced or is diligently prosecuting a civil or  
5 criminal action to redress the violations.

6 **PARTIES**

7 **Plaintiffs**

8 **Moapa Band of Paiutes**

9 15. Plaintiff Moapa Band of Paiute Indians is a recognized Indian tribe organized under a  
10 Constitution approved by the Secretary of the Interior on April 17, 1942. The tribe has 314  
11 members. The Moapa Band of Paiutes reside on the Moapa River Reservation, which consists of  
12 71,954 acres directly adjacent to Reid Gardner. The reservation is a small fraction of the Tribe's  
13 ancestral lands in the Upper Muddy River Valley—the prehistoric floodplain of the Muddy  
14 River, which flows southeasterly, ultimately draining into Lake Mead.

15 16. Tribal Members' concerns encompass the protection and restoration of the region's  
16 resources, including the airshed, the land, and the quality of the groundwater, the waters of the  
17 U.S., and all life connected with these water sources. Tribal members use, enjoy and seek to  
18 protect and restore the land and water, on and into which Defendants dispose of and discharge  
19 CCW and other industrial wastes.

20 17. The cultural, environmental, health, aesthetic, and recreational interests of Tribal  
21 members have been, are being, and will be especially adversely affected by Defendants'  
22 contamination of the land, air and water resources at and surrounding the Reid Gardner facility.

1 Sierra Club

2 18. Plaintiff Sierra Club is America's oldest and largest grassroots environmental  
3 organization. Sierra Club has more than 600,000 members and supporters nationwide, with over  
4 4,000 members in the state of Nevada. Founded in 1892, the Sierra Club has been working for  
5 well more than a century to protect communities, wild places, and the planet itself. The Sierra  
6 Club is dedicated to exploring, enjoying, and protecting the wild places of the Earth; to  
7 practicing and promoting the responsible use of the Earth's resources and ecosystems; to  
8 educating and enlisting humanity to protect and restore the quality of the natural and human  
9 environment; and to using all lawful means to carry out these objectives. The Sierra Club's  
10 concerns encompass the exploration, enjoyment and protection of the lands and waters of  
11 Nevada including areas in and around the Muddy River, Moapa Valley National Wildlife  
12 Refuge, Valley of Fire State Park, Gold Butte Area of Critical Environmental Concern (proposed  
13 national conservation area with wilderness study area), and Warm Springs Recreational Ranch.

14 Defendants

15 NV Energy

16 19. Upon information and belief, Defendant NV Energy is a Nevada-based company that  
17 owns and operates Reid Gardner Station, 501 Wally Kay Way, Moapa, NV 89025, including full  
18 ownership of Boiler Units 1-3 and co-ownership of Unit 4. In addition, NV Energy owns and  
19 operates associated facilities at Reid Gardner, including the landfill, wastewater ponds, coal  
20 piles, and related installations.

21 20. Defendant NV Energy's corporate headquarters is located at 6226 W Sahara Ave, M/S  
22 30, Las Vegas, NV 89146.

1 California Department of Water Resources

2 21. Upon information and belief, Defendant California Department of Water Resources co-  
3 owns Reid Gardner Boiler Unit 4.

4 22. Defendant California Department of Water Resources headquarters is located at 1416 9th  
5 Street, Sacramento, CA 95814.

6 23. NV Energy and California Department of Water Resources are each a “person” within  
7 the meaning of Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and Section 502(5) of CWA,  
8 33 U.S.C. § 1362(5).

9 **PLAINTIFFS’ INJURIES**

10 24. The Reid Gardner facility is located approximately 45 miles northeast of Las Vegas,  
11 Nevada, and approximately one mile southeast of the community center of the Tribal  
12 Reservation for the Moapa Band of Paiute Indians (hereinafter, “The Tribe”).

13 25. The Facility, construction of which began in the early 1960s, includes a coal-fired electric  
14 generating station, coal piles to supply the boilers, an industrial landfill used to dispose of coal  
15 combustion waste, haul roads between the generating station and the coal ash landfill, and a  
16 series of evaporation ponds to which the generating station discharges wastewater.

17 26. The four coal-fired generating units at Reid Gardner have a nominal combined capacity  
18 of 557-megawatts (MW). Reid Gardner Units 1-3, owned by NV Energy, came online between  
19 1965-1976 and each has 100 MW of generating capacity. Unit 4 came online in 1983, has a  
20 nominal capacity of 257 MW, and is owned jointly by NV Energy and the California Department  
21 of Water Resources. The facility also includes massive coal piles to supply the boilers, an  
22  
23

1 industrial landfill used to dispose of coal combustion waste, and a series of evaporation ponds to  
2 which it discharges wastewater.

3 27. The facility's 91-acre industrial waste landfill is located on the mesa south and  
4 approximately 150 feet higher in elevation than the Moapa Tribal Center and the Muddy River.  
5 The Reid Gardner Generating Station has been generating and disposing of approximately  
6 310,000 cubic yards (CY) per year of coal combustion waste at the on-site landfill since 1965.  
7 The wastes disposed of in the landfill include bottom ash, fly ash, boiler slag, and solids dredged  
8 from the wastewater ponds. The Reid Gardner coal ash landfill is largely unlined. To date, the  
9 Facility has disposed of approximately 1.2 million CY of coal combustion and related wastes  
10 (CCW) in its landfill. In 2011 NV Energy secured a permit from the local solid waste authority  
11 to expand the landfill capacity so as to enable it to dispose of CCW that could be generated by  
12 the Facility over an additional 35 years.

13 28. At peak generation, the Reid Gardner facility generates approximately 20 truckloads per  
14 day (37 cubic yards/load) of coal ash that is hauled to the coal ash landfill in open-topped trucks.  
15 The haul roads themselves are comprised, in part, of compacted coal ash.

16 29. NV Energy maintains at least three uncovered and unlined coal piles at the Reid Gardner  
17 facility. These piles store coal, at minimum, from the following sources: (a) the West Ridge  
18 Mine in central Utah for use in Units 1-4, (b) the Black Thunder Mine in the Southern Powder  
19 River Basin, Wyoming, and the Sufco Mine in Central Utah for use in Units 1-3, and (c) the  
20 Sufco and Skyline Mines in Central Utah, and the West Elk Mine in Western Colorado for use in  
21 Unit 4. The coal piles are located proximate to the north bank of the Muddy River, on bare  
22 ground with no impermeable liner separating them from the soil.



1 30. The Reid Gardner discharges approximately 490,000 gallons of wastewater per day to a  
2 series of evaporation ponds located on the floodplain of the Muddy River and on the Mesa  
3 overlooking the river. The wastewater derives from operation of the wet scrubbers, cooling  
4 tower blow-down, the bottom ash transport system, and fly ash residues. In 2010, NV Energy  
5 secured a permit from the Nevada Division of Environmental Protection authorizing it to  
6 continue its discharges to eight existing wastewater ponds on the floodplain of the Muddy River  
7 and to construct nine new wastewater ponds in the Mesa area above the river. The 2010 permit  
8 also eliminated groundwater monitoring and reporting as a requirement of the permit.

9 31. NV Energy retains, through 2014, a contract with Union Pacific Railroad to deliver coal  
10 from its various sources. For this purpose, NV Energy leases a total of 205 coal cars from  
11 Flagship Rail Services, LLC and Mitsui Rail Capital, LLC, and further utilizes rail cars provided  
12 by Union Pacific for the purpose of delivering coal from mining operations in Colorado, Utah,  
13 and Wyoming to the Reid Gardner facility. The coal train cars are uncovered and unsealed.

14 32. The Muddy River, part of the Colorado River basin, originates in thermal springs some  
15 six miles west of the Tribal Center, and flows through the Moapa Reservation. Near river mile  
16 eight the Muddy River cuts through Reid Gardner facility, with the generating station and coal  
17 piles dominating its north bank and the coal ash landfill and wastewater ponds on the river's  
18 south bank. Downstream and downgradient of the Reid Gardner facility, the Muddy River  
19 continues to flow an additional 25 miles, first to the east, and then southeast, past the  
20 communities of Moapa, Glendale, and Logandale, before emptying, near Overton, Nevada, into  
21 the northern arm of Lake Mead.

1 33. The Reid Gardner facility is underlain by a shallow alluvial aquifer that intersects the  
2 Muddy River. Defendants have unlawfully contaminated the groundwater aquifer and river with  
3 leachate from the facility's unlined coal ash landfill and coal piles, leaking wastewater ponds,  
4 and other sources at the Reid Gardner facility.

5 34. Defendants' coal ash landfill and wastewater ponds on or near the Mesa at Reid Gardner  
6 are upwind and higher in elevation than the Moapa tribal community center. During periods of  
7 prevailing southerly winds, Defendants' operations cause the wind sweeping over the Reid  
8 Gardner facility to entrain and carry CCW-laden dust and other particulates to the community  
9 center of the Moapa Band of Paiutes.

10 35. Coal combustion wastes (CCW) contain a number of toxic or potentially toxic pollutants  
11 including aluminum, antimony, arsenic, barium, beryllium, boron, cadmium, chloride,  
12 chromium, cobalt, lead, manganese, mercury, molybdenum, nickel, selenium, thallium,  
13 vanadium, and zinc, as well as polycyclic aromatic hydrocarbons (PAHs) and radioactive  
14 isotopes that may cause cancer in persons exposed through inhalation or ingestion of particles.  
15 Inhalation of CCW also may cause a decrease in pulmonary function, chronic bronchitis, or  
16 pneumoconiosis. Many of these contaminants are found in groundwater monitoring wells at the  
17 Facility at levels far exceeding state action levels and federal maximum contaminants levels, as  
18 detailed *infra* and in the incorporated by reference notice letter. *See* Attachment A.

19 36. Plaintiffs' members, staff and volunteers live, work, recreate, fish, hunt, study and pursue  
20 spiritual practices in the areas most immediately affected by the Reid Gardner facility. The Reid  
21 Gardner facility's CCW contamination injures Plaintiffs' members, staff and volunteers' health  
22 and their aesthetic, recreational, environmental, spiritual, economic, educational interests in these  
23

1 areas.

2 37. Plaintiffs' members in the community center of the Tribal reservation live within a mile  
3 or two of the Reid Gardner facility, including its landfill, wastewater ponds, the generating  
4 station itself, its adjacent coal piles, and the facility's other sources of pollutants and  
5 contaminants. Plaintiffs' members are reasonably concerned about harm to their health from  
6 breathing air contaminated with particulates from the coal ash landfill, solids from the  
7 wastewater evaporation ponds, coal dust, and other contaminants blown into the reservation from  
8 the Reid Gardner facility. Plaintiffs' members are also concerned about the threat to their health  
9 caused by needing to shutter themselves indoors, including during hot weather, so as to avoid  
10 exposure to southerly winds that entrain contaminants from the facility.

11 38. Plaintiffs' members utilize the Muddy River for swimming, fishing, hunting, and  
12 harvesting of plants for medicinal and cultural purposes. Plaintiffs' members are reasonably  
13 concerned that CCW contamination of groundwater feeding the Muddy River and direct  
14 deposition of CCW (including CCW blown into the river), impairs the safety of the river for  
15 swimming and for consuming fish caught from the river, or game shot nearby that may have  
16 ingested river water contaminated by CCW. As well, Plaintiffs are concerned about the safety of  
17 handling and using plants harvested from the banks of the Muddy River.

18 39. Plaintiffs' members utilize the land and river in the area near the Reid Gardner facility for  
19 religious purposes and spiritual practice. CCW dust and associated fumes and gases from the  
20 Reid Gardner facility, including from the coal ash landfill and CCW ponds, impair Plaintiffs'  
21 ability to pursue these practices and undermines the quality of the experience. Plaintiffs also  
22 attempt to grow vegetables in their home gardens, and plaintiffs are reasonably concerned that

1 toxic dust from the Reid Gardner facility deposited on their soil and vegetables renders their  
2 produce unsafe or otherwise impairs its quality.

3 40. Plaintiffs' members, volunteers and staff have seen and smelled the coal ash landfill and  
4 wastewater ponds, including the dust clouds they generate during periods of high wind and the  
5 odors that may be especially intense during hot periods.

6 41. Plaintiffs' members derive recreational, environmental, aesthetic, health, and  
7 inspirational benefits from their activities in exploring the lands and rivers of the area, and  
8 Plaintiffs' members intend to continue to use and enjoy these and other Nevada public lands,  
9 wildlands, wildlife habitat, rivers, streams, and environs. However, the environmental, health,  
10 aesthetic, and recreational interests of Plaintiffs have been, are being, and will be adversely  
11 affected by Defendants' disposal and discharges of coal ash, coal, wastewater and other industrial  
12 wastes, as Plaintiffs reasonably believe that these activities are contaminating the region's land  
13 and groundwater, as well as the Muddy River.

14 42. Further information about the Facility, its sources of contamination, and its endangerment  
15 of the environment and of public health are contained in subsequent paragraphs in this  
16 Complaint, and in Plaintiffs' February 8, 2013 Notice of Intent to Sue. *See* Attachment A.

17 43. Plaintiffs' members are reasonably concerned that unless the relief requested herein is  
18 granted, their interests will continue to be adversely affected by Defendants' violations of RCRA  
19 and the CWA.

20 **STATUTORY AND REGULATORY FRAMEWORK**

21 44. Section 7002(a)(1)(B) of RCRA, 42 U.S.C. § 6972(a)(1)(B), provides that citizens may  
22 commence a citizen suit against "any person," "including any past or present generator, past or  
23

1 present transporter, or past or present owner or operator of a treatment, storage, or disposal  
2 facility who has contributed or who is contributing to the past or present handling, storage,  
3 treatment, transportation, or disposal of any solid or hazardous waste which may present an  
4 imminent and substantial endangerment to health or the environment.”

5 45. Section 1002(b) of RCRA states that “disposal of solid waste... in or on the land without  
6 careful planning and management can present a danger to human health and the environment,”  
7 42 U.S.C. § 6901(b)(1), and that “open dumping is particularly harmful to health, contaminates  
8 drinking water from underground and surface supplies, and pollutes the air and the land....” 42  
9 U.S.C. § 6901(b)(4).

10 46. As required by statute, EPA has promulgated criteria under RCRA § 6907(a)(3) defining  
11 solid waste management practices that constitute open dumping. *See* 42 U.S.C. § 6944(a); 40  
12 C.F.R. Parts 257 and 258. These regulations outline certain solid waste disposal practices which,  
13 if violated, pose a reasonable probability of adverse effects on health or the environment. 40  
14 C.F.R. § 257.3.

15 47. The purpose of RCRA is “to promote the protection of health and the environment.”  
16 RCRA seeks to accomplish this by “prohibiting future open dumping on the land and requiring  
17 the conversion of existing open dumps to facilities which do not pose a danger to the  
18 environment or to health....” 42 U.S.C. § 6902(a).

19 48. Section 4005(a) of RCRA prohibits “any solid waste management practice or disposal of  
20 solid waste... which constitutes the open dumping of solid waste....” 42 U.S.C. § 6945(a).

21 49. Under section 1004(3), “The term ‘disposal’ means the discharge, deposit, injection,  
22 dumping, spilling, leaking, or placing of any solid waste... into or on any land or water so that

1 such solid waste or hazardous waste or any constituent thereof may enter the environment or be  
2 emitted into the air or discharged into any waters, including ground-waters.” 42 U.S.C. §  
3 6903(3).

4 50. RCRA defines “solid waste” as “any garbage, refuse, sludge from a waste treatment plant  
5 ... or air pollution control facility and other discarded material, including solid, liquid, semisolid,  
6 or contained gaseous material resulting from industrial ... *operations*....” 42 U.S.C. § 6903(27)  
7 (emphasis added).

8 51. EPA criteria for solid waste disposal practices prohibit the contamination of any  
9 underground drinking water source beyond the solid waste boundary of a disposal site. 40  
10 C.F.R. § 257.3-4(a).

11 52. An “underground drinking water source” includes any aquifer in which the groundwater  
12 contains less than 10,000 milligrams per liter of total dissolved solids. 40 C.F.R. § 257.3-4(c)(4).

13 53. “Contaminate” an underground drinking water source means to cause the groundwater  
14 concentration of a listed substance to exceed its corresponding maximum contaminant level  
15 specified in Appendix I to 40 C.F.R. Part 257, or cause an increase in the concentration of that  
16 substance where the existing concentration already exceeds the maximum contaminant level in  
17 Appendix I.

18 54. Also pursuant to the EPA’s RCRA regulations, “a facility shall not cause a discharge of  
19 pollutants into waters of the United States that is in violation of CWA NPDES requirements.”  
20 40 C.F.R. §257.3-3(a).

21 55. Section 505(a)(1) of CWA, 42 U.S.C. § 1365(a)(1), provides that any citizen may  
22 commence a civil action against “any person,” “who is alleged to be in violation of [] an effluent  
23

1 standard or limitation. . . .”

2 56. Under the CWA, the United States has committed itself "to restore and maintain the  
3 chemical, physical, and biological integrity of the Nation's waters," including establishing a  
4 "national goal that the discharge of pollutants into the navigable waters be eliminated." 33  
5 U.S.C. §1251.

6 57. Pursuant to the CWA, a discharge of a pollutant includes "any addition of any pollutant  
7 to navigable waters from any point source." 33 U.S.C. § 1362(12). *See also* 33 U.S.C. §  
8 1362(7) (definition of “navigable waters”); 40 C.F.R. § 122.2 (definition of “waters of the  
9 U.S.”).

10 58. The CWA specifies a number of materials and wastes that, if discharged into water,  
11 render them pollutants, including, but not limited to, solid waste, chemical wastes [and]  
12 industrial waste, biological materials, sand, and rock. 33 U.S.C. § 1362(6).

13 59. To advance its goals, Congress established in the CWA that all discharges of pollutants  
14 are prohibited "except in compliance" with specified provisions of the CWA including, most  
15 importantly, the National Pollutant Discharge Elimination System (NPDES) permitting program.  
16 33 U.S.C. §1311(a); 33 U.S.C. §1342(a); 40 C.F.R. §§122.1 *et seq.*

17 60. The NPDES program requires a potential discharger to first obtain a NPDES permit that  
18 limits the type and quantity of pollutants to be released so as to maintain water quality standards,  
19 among other objectives. 33 U.S.C. §1342(a); 40 C.F.R. §122.1. No NPDES permit may be  
20 issued where discharges pursuant to it would cause receiving water-bodies to fail to meet water  
21 quality standards. *Id.* and 40 C.F.R. §122.4 (prohibitions on permit issuance).

1 61. The Nevada Division of Environmental Protection has set “action levels” for  
2 “contaminants of concern” to remediate the quality of groundwater that has been contaminated  
3 by the Reid Gardner facility.

4 62. Pursuant to NAC 445A.22735(1)(c), these action levels must be set at levels equivalent  
5 either to background conditions or else at “[a]n appropriate level of concentration” based on  
6 “protection of public health and safety and the environment” accounting for the presence of  
7 multiple pollutants and “other potential threats” to groundwater or to other “sensitive areas of the  
8 environment.”

9 **FACTS**

10 63. Defendant NV Energy is the owner or operator of the sources of environmental  
11 contamination at the Reid Gardner facility, including the coal-fired electrical generating station  
12 that produces<sup>1</sup> associated solid wastes, wastewater, and other sources of environmental  
13 contamination at and surrounding the Reid Gardner facility.

14 64. Defendant California Department of Water Resources is the co-owner, with NV Energy,  
15 of Unit 4-the largest boiler at Reid Gardner.

16 65. At its Reid Gardner Station, Defendants’ produce coal combustion wastes (CCW), a by-  
17 product of its coal-fired power generation. Defendants dispose of these wastes in the industrial  
18 waste landfill that is adjacent to the Reid Gardner generating station.

19  
20 \_\_\_\_\_  
21 <sup>1</sup> Hereinafter, for the sake of brevity, unless the context of this Complaint indicates otherwise,  
22 Plaintiffs’ present tense use of the following terms should be taken to include their past tense  
23 formulation: apply to, contaminate(s), dispose(s) of, generate(s), operate(s), operations, owner,  
owns, and produce(s). For example, Plaintiffs’ statement, “Defendants dispose of these wastes,”  
in this brief means “Defendants dispose of and have disposed of these wastes.”



1 66. Upon information and belief, Defendants also dispose of, or have disposed of, asbestos,  
2 asbestos-containing materials, construction and demolition debris, and other solid and hazardous  
3 waste<sup>2</sup> in the landfill next to the facility.

4 67. The Reid Gardner landfill is subject to Permit LFOO6-CMF-01 issued by the Southern  
5 Nevada Health District to NV Energy. The Permit authorizes, the extent permitted by other law  
6 and regulation, the disposal of the following materials: bottom ash, fly ash, reactivator solids,  
7 wastewater pond solids, construction and demolition debris, and asbestos containing material.

8 68. The Reid Gardner landfill, upon information and belief, has no liner to contain the wastes  
9 disposed.

10 69. Also at the Reid Gardner facility, Defendants produce process water and wastewater  
11 (hereinafter referred to simply as “wastewater”) as a by-product of the air pollution control  
12 system on the facility’s coal-fired electrical generating plant and other industrial processes.

13 70. Defendants discharge or have discharged this wastewater to a series of evaporation ponds  
14 near the facility and/or apply or have applied it to the landfill and/or haul roads for dust  
15 suppression. These discharges are authorized by Permit NEV91022, issued by the Nevada  
16 Division of Environmental Protection.

17 71. Permit NEV91022 is not an NPDES permit and is not issued pursuant to the Clean Water  
18 Act. Defendants do not retain an NPDES permit for the Reid Gardner facility.

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19 <sup>2</sup> Per RCRA §1004(5), hazardous waste includes “a solid waste, which because of its quantity,  
20 concentration, or physical, chemical . . . characteristics may . . . [p]ose a substantial present or  
21 potential hazard to human health or the environment when improperly treated, stored,  
22 transported, disposed of, or otherwise managed.”

1 72. The types of materials specifically permitted by NEV91022 to be discharged to the ponds  
2 under this permit include wastewater from the wet scrubbers, cooling tower blow-down, boiler  
3 bleed-off, and fly ash residue from the bottom ash transport system.

4 73. Solids produced by or dredged from the wastewater ponds, when disposed of in the  
5 landfill by Defendants, are subsumed in Defendants' use of the term "coal ash" unless the  
6 context indicates otherwise.

7 74. Defendants' operations at Reid Gardner include solid waste disposal, wastewater  
8 discharge, and related operations at the facility's coal ash landfill, wastewater ponds, coal piles,  
9 haul roads, and coal trains, as further described in Attachment A to this Complaint. These  
10 operations contaminate the land and waters of the state adjacent to, under, and around the facility  
11 through dust, particulates, pond leakage, landfill and coal pile leachate, gases produced in  
12 decomposition, and other processes. *See* Attachment A.

13 75. Constituents of the environmental contamination denoted in the above paragraph include,  
14 but are not limited to, arsenic, boron, chloride, chromium, manganese, molybdenum, selenium,  
15 sulfate, and total dissolved solids. These contaminants present significant health and  
16 environmental risks when they are not properly isolated from the environment, including, but not  
17 limited to, the risks discussed in Attachment A, Sections I and II.

18 76. Particles and gases from Defendants' operations at the Reid Gardner facility are carried  
19 by wind or other means from the facility to the surrounding area, including to the reservation and  
20 the community center of the Moapa Band of Paiutes.

1 77. Landfill and coal pile leaching, wastewater pond leaking, and other sources at the Reid  
2 Gardner facility have contaminated groundwater at and surrounding the facility, including  
3 groundwater that could otherwise serve as an underground drinking water source.

4 78. Groundwater at the Reid Gardner facility is hydrologically connected to, and intersects  
5 with, the Muddy River. At points including, but not limited to, the portion of the Reid Gardner  
6 site east of the wastewater ponds near the floodplain of the Muddy River, the groundwater from  
7 the shallow alluvial aquifer flows towards and discharges into that river. Sources of groundwater  
8 contamination at the Reid Gardner facility, including wastewater ponds and the landfill, are  
9 upgradient of these discharge points.

10 79. Defendants' discharges of contaminants to the hydrologically-connected aquifer have  
11 occurred continuously from 2008 to the present from several or all of the following wastewater  
12 ponds, each of which constitutes a separate point source: Pond 4A adjacent to the north bank of  
13 the Muddy River; Ponds 4B-1, 4C-1 and 4C-2, D, E-2, F and G alongside or partly adjacent to  
14 the south bank of the Muddy River; and Ponds 4B-2 and 4B-3 to the south of the Muddy River.

15 80. Defendants are or should be aware of other discharges to the hydrologically-connected  
16 groundwater system from these or other wastewater ponds at the Reid Gardner facility.

17 81. Defendants' solid waste operations and practices at the Reid Gardner facility have caused  
18 continuous discharges, which continue to occur, to the hydrologically-connected groundwater  
19 aquifer – and thereby, to the Muddy River – from contaminated leachate percolating through the  
20 solid waste landfill and haul roads constructed with or contaminated by Defendants' coal ash.

21 82. Groundwater monitoring data from at least the following wells at the Reid Gardner  
22 facility– LMW-2, LMW-4R, LMW-3, LMW-5R, LMW-6R, LMW-8R, KMW-12, KMW-16 –

1 show levels of ground-water quality parameters that substantially exceed state action-level  
2 concentrations for boron, molybdenum, sodium, sulfate, total dissolved solids (TDS) and/or  
3 vanadium.

4 83. Defendants are or should be aware of other discharges to the hydrologically-connected  
5 groundwater system from the solid waste landfill and haul roads at the Reid Gardner facility.

6 84. Defendants discharge contaminants to the hydrologically-connected groundwater aquifer  
7 through leachate percolating through the coal piles adjacent the electrical generating state and the  
8 north bank of the Muddy River. This contamination is established by, among other sources  
9 discussed in incorporated-by-reference Attachment A to this Complaint, monitoring data  
10 including that from monitoring wells HM-53 and IMW-16S. That data indicates contamination  
11 exceeding state action levels across multiple constituents, including arsenic, boron, chloride,  
12 magnesium, molybdenum, sodium, sulfate, and TDS.

13 85. Defendants are or should be aware of other discharges to the hydrologically-connected  
14 groundwater system from the coal piles at the Reid Gardner facility.

15 86. Groundwater monitoring data from 2008 to date, the direction of groundwater flow, and  
16 water quality data from the Muddy River, among sources delineated in the incorporated-by-  
17 reference Attachment A to this Complaint, establish that Defendants' operations of and practices  
18 at the Reid Gardner facility – including its landfill, haul roads, wastewater ponds, coal piles, and  
19 electrical generating station—are contaminating groundwater and surface water on site and  
20 offsite.

21 **CLAIMS FOR RELIEF**

1 87. Defendants are jointly and severally liable for the environmental contamination stemming  
2 from all sources at the Reid Gardner facility.

3 **COUNT I**

4 **RCRA- Imminent and Substantial Endangerment**

5 88. Plaintiffs incorporate by reference the allegations of the preceding paragraphs of this  
6 Complaint.

7 89. Pursuant to RCRA Section 7002(a)(1)(B), citizens may commence a citizen suit against  
8 “any person,” “including any past or present generator, past or present transporter, or past or  
9 present owner or operator of a treatment, storage, or disposal facility who has contributed or who  
10 is contributing to the past or present handling, storage, treatment, transportation, or disposal of  
11 any solid or hazardous waste which may present an imminent and substantial endangerment to  
12 health or the environment.” Section 7002(a)(1)(B); 42 U.S.C. § 6972(a)(1)(B).

13 90. All defendants are “persons” under section 1004 of RCRA, 42 U.S.C. § 6903(15).

14 91. Coal ash is a “solid waste” under RCRA section 1004, because it is garbage, refuse,  
15 and/or sludge from an air pollution control facility, and/or discarded solid, liquid, and/or  
16 semisolid material resulting from an industrial, commercial, and/or mining operation. 42 U.S.C.  
17 § 6903(27).

18 92. As indicated above, coal ash is moved to, and stored and disposed of in a massive, largely  
19 unlined, landfill at the Reid Gardner facility. As a result, Defendants contribute to the past or  
20 present handling, storage, treatment, transportation, or disposal of a solid waste.

1 93. Defendants, who own and/or operate the Reid Gardner Generating Station, are past and  
2 present generators of coal ash and wastewater and related byproducts of the coal-fired electrical  
3 generation.

4 94. Defendants' handling, storage, treatment, transportation or disposal of coal ash may, and,  
5 upon information and belief, does present an imminent and substantial endangerment to health  
6 and/or the environment.

7 95. Specifically, as alleged above, and as further set forth in Attachment A, ground and  
8 surface water contamination levels at and down-gradient and downstream from the Reid Gardner  
9 facility have contaminant levels that exceed the maximum safe consumption limits established  
10 under state and federal law, establishing a case of imminent and substantial endangerment to the  
11 public and environment.

12 96. The National Primary Drinking Water Standards ("NPDWS") are established under the  
13 Safe Drinking Water Act ("SDWA"), 42 U.S.C. § 300f, *et seq.* The NPDWS are health-based  
14 standards that specify contaminants known to have an adverse effect on the health of persons at  
15 levels beyond the parameters set forth in the regulations. 42 U.S.C. § 300f(1)(B).

16 97. The State of Nevada has set "action levels" for "contaminants of concern" to remediate  
17 the quality of groundwater that has been contaminated by the Reid Gardner facility.

18 98. Pursuant to state regulations, action levels for contaminants of concern must be set based  
19 on "protection of public health and safety and the environment" that accounts for the presence of  
20 multiple pollutants and "other potential threats" to groundwater or to other "sensitive areas of the  
21 environment." NAC 445A.22735(1)(c).

1 99. The action levels established by the State are insufficient to protect groundwater quality  
2 in part because they are far more lax than corresponding Safe Drinking Water Act and RCRA  
3 standards. *See* Attachment A.

4 100. Defendant NV Energy reported over 7,000 exceedances of state action levels for  
5 contaminants of concern to the Nevada Division of Environmental Protection in the period 2008  
6 to present, covering several harmful pollutants, including chloride, sulfate, total dissolved solids,  
7 arsenic, boron, chromium, manganese, magnesium, molybdenum, selenium, and sodium. *See*  
8 Attachment A.

9 101. Each exceedance of a state action level for a contaminant of concern is also a violation of  
10 a SDWA or RCRA standard for those contaminants for which SDWA or RCRA standards also  
11 have been established.

12 102. Groundwater monitoring data also indicates that, in the period 2008-2012 there were  
13 additional exceedances of federal standards for toxic contaminants beyond those identified as  
14 exceedances of the less restrictive state action levels. These included, as detailed in the  
15 incorporated by reference Attachment A: chromium, an additional six exceedances of the RCRA  
16 maximum contaminant level (“MCL”); arsenic, an additional 289 exceedances of the RCRA  
17 MCL; and selenium, an additional 262 exceedances of the RCRA MCL.

18 103. Upon information and belief, Defendant NV Energy’s monitoring reports to the state  
19 systematically underreport exceedances of RCRA and SDWA MCL standards for contaminants  
20 of concern – including arsenic, chromium, manganese, and selenium. Such systematic  
21 underreporting is attributable, among other reasons, to the Defendants’ choice of reporting limits.  
22 *See* Attachment A.

1 104. Upon information and belief, Defendants are aware of other instances of their  
2 contamination of waters of the State at or near the Reid Gardner facility in addition to those  
3 denoted or describe above.

4 105. 40 C.F.R. § 257.3-4(a) prohibits a facility or practice from contaminating an underground  
5 drinking water source. “Contamination” occurs when a facility or practice introduces a toxic  
6 substance that causes the concentration of that substance in ground water to exceed certain  
7 parameters listed in Appendix I to 40 C.F.R. § 257.3-4(a).

8 106. Defendants’ operations at the Reid Gardner facility have contaminated and continue to  
9 contaminate groundwater and surface water to levels that exceed the maximum limits established  
10 under state and federal law, including the limits referenced in the above-cited paragraph for  
11 arsenic, chromium and selenium. These practices present an imminent and substantial  
12 endangerment to the environment and/or public health.

13 107. Upon information and belief, Defendants are aware of other instances of their  
14 contamination of ground- and surface waters at or near the Reid Gardner facility at levels  
15 exceeding the limits established under RCRA.

16 108. Upon information and belief, Defendants’ practices also generate fugitive dust laden with  
17 toxic chemicals that contributes to the imminent and substantial endangerment to the  
18 environment and public health caused by their operations of the Reid Gardner facility.

19 109. Defendants’ sources of such fugitive dust at the facility include, but are not limited to, the  
20 coal ash landfill, solids and liquids lifting off the wastewater ponds, the coal piles, and coal  
21 spillage near the coal train rail cars.



1 110. Defendants' generation of toxic dust "may present an imminent and substantial  
2 endangerment to health or the environment," RCRA § 7002(a)(1)(B) of RCRA, 42 U.S.C. §  
3 6972(a)(1)(B), if inhaled or ingested by persons downwind of the source.

4 111. Plaintiffs' members have observed Defendants' dust generation stemming from the  
5 facility during high-wind event days on numerous occasions. *See* Attachment A. Upon  
6 information and belief, Defendants are aware of other occasions beyond those delineated in  
7 Attachment A when winds blew coal combustion waste (CCW) and related materials from the  
8 Reid Gardner facility into the Tribal reservation.

9 112. Plaintiffs' interests are harmed and will continue to be harmed by Defendants' failure to  
10 abate the endangerment caused by their operations at the Reid Gardner facility, unless the Court  
11 grants the relief sought herein.

12 **COUNT II**

13 **RCRA- Illegal Open Dumping**

14 113. Plaintiffs incorporate by reference the allegations of the preceding paragraphs of this  
15 Complaint.

16 114. RCRA forbids "open dumping" and the operation or establishment of an "open dump."  
17 42 U.S.C. § 6945(a). As required by statute, EPA has promulgated criteria under RCRA §  
18 6907(a)(3) defining solid waste management practices that constitute open dumping. *See* 42  
19 U.S.C. § 6944(a); 40 C.F.R. Parts 257 and 258. These regulations outline certain solid waste  
20 disposal practices, which, if violated, pose a reasonable probability of adverse effects on health  
21 or the environment. 40 C.F.R. § 257.3.

1 115. Solid waste disposal practices prohibit the contamination of any underground drinking  
2 water source beyond the solid waste boundary of a disposal site. 40 C.F.R. § 257.3-4(a).

3 116. Defendants' solid waste disposal operations and practices cause groundwater  
4 contaminant concentrations, both within and beyond the boundary of its disposal site—including  
5 for contaminants arsenic, chromium and selenium—to exceed limits set forth in Appendix I to 40  
6 C.F.R. Part 257.

7 117. Groundwater concentrations attributable to the solid waste disposal practices at the Reid  
8 Gardner facility for arsenic, chromium, and selenium, among other pollutants, as documented in  
9 the incorporated-by-reference Attachment A to this Complaint, have repeatedly exceeded the  
10 maximum contaminant levels.

11 118. Defendants' Reid Gardner facility constitutes an "open dump" under RCRA Section  
12 1004(14), 42 U.S.C. § 6903(14), and their practices constitute illegal open dumping in violation  
13 of RCRA Section 4005, 42 U.S.C. § 6945.

14 119. EPA's solid waste disposal regulations, and the relevant condition, requirement, standard  
15 and prohibition contained therein, forbids the contamination of any surface water source in  
16 violation of NPDES requirements or water quality standards. 40 C.F.R. § 257.3-3(a). Such  
17 facilities and/or practices "pose a reasonable probability of adverse effects on health or the  
18 environment." 40 C.F.R. § 257.3.

19 120. Defendants operate the Reid Gardner facility without an NPDES permit, while their solid  
20 waste operations and practices at Reid Gardner, as documented in the incorporated-by-reference  
21 Attachment A to this Complaint, cause discharges of pollutants to the Muddy River.

1 121. The practices described in the foregoing paragraphs pose a reasonable probability of  
2 adverse effects on health or the environment and a violation of the prohibition against open  
3 dumping under RCRA.

4 122. Upon information and belief, Defendants are aware of other instances where their  
5 operations and practices at the Reid Gardner facility contaminate waters of the State and waters  
6 of the United States, wherein such operations constitute illegal open dumping.

7 123. Pursuant to Section 3008, 42 U.S.C. § 6928, Defendants may be subject to an injunction  
8 under RCRA ordering it to cease open dumping and remediate the environmental contamination  
9 they have caused and/or contributed to, including widespread soil, groundwater and surface  
10 water contamination.

11 124. Plaintiffs' interests are harmed and will continue to be harmed by Defendants' open  
12 dumping unless the Court grants the relief sought herein.

13 **COUNT III**

14 **Clean Water Act- Discharge of Pollutants Without NPDES Permit into Waters of United**  
15 **States**

16 125. Plaintiffs incorporate by reference the allegations of the preceding paragraphs of this  
17 Complaint.

18 126. The Muddy River is a water of the United States protected by the Clean Water Act.

19 127. Defendants did not have and do not retain a National Pollution Discharge Elimination  
20 System Permit authorizing their discharges of contaminants into the Muddy River.

21 128. Defendants' wastewater ponds are "point sources" under the CWA. 33 U.S.C. §  
22 1362(14).

1 129. Defendants have discharged contaminants to the Muddy River, at the very least, from  
2 February 2008 to the present (and for many years prior to 2008), as described supra and in the  
3 incorporated by reference Attachment A.

4 130. Defendants' unlawful discharges to the Muddy River include, but are not limited to,  
5 discharges from the Reid Gardner facility through wastewater pond leakage; landfill, haul road  
6 and coal pile leachate; and other source leakage and leaching to groundwater, where such  
7 groundwater is hydrologically-connected to the Muddy River.

8 131. Such operations and discharges are continuing and are likely to continue into the future.

9 132. Upon information and belief, Defendants are aware of other instances of their  
10 contamination of waters of the U.S. at or near the Reid Gardner facility.

11 133. Each such discharge from each point source on each separate day at Defendants' Reid  
12 Gardner facility constitutes a separate violation of the CWA.

13 **RELIEF REQUESTED**

14 WHEREFORE, Plaintiffs Moapa Band of Paiutes and Sierra Club respectfully request that the  
15 Court enter a judgment:

16 A. Declaring that Defendants' past and/or present generation, handling, storage, treatment,  
17 transportation or disposal of solid waste presents, or may present, an imminent and substantial  
18 endangerment to public health or to the environment.

19 B. Declaring that Defendant's storage and disposal of their wastes constitute illegal open  
20 dumping.

1 C. Declaring that Defendants' discharges to the Muddy River that are not covered by an  
2 NPDES permit, including its discharges to hydrologically-connected groundwater and direct  
3 discharges constitute unlawful discharges.

4 D. Issuing a compliance order that requires Defendants to cease and desist from disposing of  
5 additional wastes on any portion of Defendants' facility at Reid Gardner, including its landfill,  
6 and that requires Defendants to cease and desist discharging additional wastewater into  
7 wastewater ponds at Reid Gardner.

8 E. Ordering Defendant to take all such actions as may be necessary to eliminate any present  
9 and future endangerment and open dumping practices, including but not limited to:

10 (a) funding an independent, comprehensive, scientific study to determine the precise  
11 nature and extent of the endangerment and harm caused by the open dumping, including  
12 a detailed examination of the fate and transport of solid waste from the facility to the  
13 waters and soils of the surrounding area, and from the water and soils to biological  
14 receptors;

15 (b) funding an independent, comprehensive, scientific study, based on the results of the  
16 study described in subparagraph (a) above, of appropriate, effective, environmentally-  
17 sound means to eliminate the endangerment and harm caused by open dumping;

18 (c) developing and implementing an appropriate and effective remediation plan, based on  
19 the studies described in subparagraphs (a) and (b) above, which will remediate the soil  
20 and groundwater contamination caused by or contributed to by Reid Gardner's past and  
21 present handling, storage, treatment, transportation, or disposal of coal ash and related  
22 wastes, and other industrial wastes at Reid Gardner;

1 F. Issuing a compliance order that requires Defendants to remove and dispose of all solid  
2 wastes on NV Energy's property, including the solids and sludge that has accumulated in the  
3 bottom of the wastewater ponds (both lined and unlined), the wastes that have been disposed of  
4 in the coal ash landfill, and the contaminated soil – including impacted soils downgradient of the  
5 facility.

6 G. Issuing a compliance order that requires Defendants to remediate the Muddy River  
7 through dredging or excavation of contaminated soils from the bed and banks of the river,  
8 replacing the soils with clean sediments, restoring the river to a stable configuration, and  
9 reestablishing riparian vegetation.

10 H. Issuing a compliance order that requires Defendants to remediate contaminated ground  
11 water by removing the water from the aquifer and treating it until the concentrations of all  
12 contaminants are below regulatory standards. The order must ensure that contaminated water  
13 recovered from the aquifer is contained (not reapplied or discharged into the environment) and  
14 either transported to an off-site treatment facility, or to a new water treatment facility constructed  
15 at the Reid Gardner site.

16 I. Issuing a compliance order that requires Defendants to remediate contaminated soils on  
17 and around the Reid Gardner facility until the concentrations of all contaminants are below  
18 regulatory standards.

19 J. Issuing a compliance order that requires Defendants to capture, adequately treat, and  
20 sequester as necessary all surface water or groundwater on or within its land, except surface  
21 water that flows as the direct result of snowmelt or a precipitation event, so that discharges of  
22

1 such water do not cause or contribute to violation of any applicable water quality standards in  
2 any water resource that receives such discharge.

3 K. Issuing temporary and/or permanent injunctive relief against Defendants, ordering  
4 Defendants to cease all activities constituting the imminent and substantial endangerment to the  
5 public health and environment, to cease all activities constituting illegal open dumping, and to  
6 cease all discharges directly to the Muddy River or to groundwater that is or may be  
7 hydrologically-connected to the Muddy River.

8 L. Issuing temporary and/or permanent injunctive relief against Defendants, ordering  
9 Defendants to provide to Plaintiffs all reports and data relevant to compliance with the Court's  
10 Order, and providing that Plaintiffs will have oversight over the compliance order's provisions  
11 regarding environmental remediation of the facility.

12 L. Ordering Defendant to pay Plaintiffs' reasonable attorneys' fees, expert witness fees, and  
13 costs incurred in prosecuting this action pursuant to 42 U.S.C. § 6972(e), 33 U.S.C. § 1365(d)  
14 and 28 U.S.C. § 2412(d), and in overseeing the Court's remediation compliance order.

15 M. Ordering such other relief as the Court may deem just and proper.

16 /

17 /

18 /

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21 /

22 /

1 Respectfully submitted this 8th day of August, 2013.

2 s/ Daniel M. Galpern

3 DANIEL M. GALPERN, ESQ. (*pro hac vice*  
4 *forthcoming*)

5 CHARLES M. TEBBUTT, ESQ. (*pro hac vice*  
6 *forthcoming*)

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**ATTACHMENT A**  
**Notice of Intent to Sue**

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**Eugene, OR 97401**  
**Ph.: 541-344-3505, Fax: 541-344-3516**

By Registered Mail, Return Receipt Requested

February 8, 2013

Michael W. Yackira  
President and Chief Executive Officer  
NV Energy  
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Las Vegas, Nevada 89146

Mark W. Cowin, Director  
California Department of Water Resources  
1416 - 9th Street, Room 1115-1  
Sacramento, CA 95814

**NOTICE OF VIOLATION AND INTENTION TO SUE**  
**PURSUANT TO 42 U.S.C. § 6972 and 33 U.S.C. § 1365**

The Moapa Band of Paiute Indians and the Sierra Club (hereinafter, “Citizens”) notify each of you that, on or after the 60<sup>th</sup> day from the date of this notice, in accordance with 42 U.S.C. § 6972(b)(1), and on or after the 90<sup>th</sup> day from the date of this notice, in accordance with 42 U.S.C. § 6972(b)(2)(A), Citizens intend to initiate a citizen suit against NV Energy and the California Department of Water Resources, as owners and operators of Reid Gardner Generating Station (hereinafter, “Owners”), pursuant to sections 7002(a)(1)(A) and (B) of the Resource Conservation and Recovery Act (“RCRA”), 42 U.S.C. §§ 6972(a)(1)(A) and (B). The suit will allege that Owners’ past and continuing practices at Reid Gardner Generating Station and its associated installations (collectively, the “Reid Gardner facility” or “the Facility”), including toxic coal combustion waste dust and water contamination, may, and do: (1) violate a standard, regulation, condition, requirement, prohibition, permit or order which has become effective pursuant to RCRA, so that NV Energy’s practices constitute open dumping under RCRA, and (2) present an imminent and substantial endangerment to health and the environment.

Further, this letter shall serve to notify you that, on or after the 60<sup>th</sup> day from the date of this notice, pursuant to section 505(a)(1)(A) of the Clean Water Act (“CWA”), 33 U.S.C. § 1365(a)(1)(A), Citizens intend to file a citizen suit against Owners pursuant to Section 301 of the CWA, 33 U.S.C. § 1311(a). The suit will allege that Owners’ past and continuing practices at the Reid Gardner facility, since at least 2008, include unlawful discharges of pollutants from a point source into waters of the United States without the authorization of a National Pollutant Discharge Elimination System (“NPDES”) permit.

## I. Introduction

Reid Gardner is a coal-fired, 4-boiler steam-electric generating facility, whose nominal combined capacity is 557-megawatt (MW). Reid Gardner Units 1-3, owned by NV Energy, came online between 1965-1976 and each has 100 MW of generating capacity. Unit 4 came online in 1983, has a nominal capacity of 257 MW, and is owned jointly by NV Energy and the California Department of Water Resources. NV Energy operates the entire Facility, including operations to store, transport and dispose of coal combustion wastes including fly ash, bottom ash, boiler slag, flue gas desulfurization wastewater and process water wastes.

The Reid Gardner Facility is located approximately 45 miles northeast of Las Vegas, Nevada and approximately one mile southeast of the community center of the Tribal Reservation for the Moapa Band of Paiute Indians. The Facility includes the generating station, massive coal piles to supply the boilers, a 91-acre landfill used to dispose of coal combustion waste, and, on the floodplain of the Muddy River and the Mesa overlooking the river, a series of wastewater ponds used to dispose of concentrated contaminated sludge.

The Muddy River, part of the Colorado River basin, originates in thermal springs some six miles west of the Tribal Center. Near River mile eight the Reid Gardner Facility dominates the banks and land adjacent to the Muddy River, with the coal ash landfill and wastewater ponds to the River's south and the generating facility and its coal piles to its north. Downstream and downgradient of the Reid Gardner facility, the Muddy River continues to flow an additional 25 miles, first to the east, and then southeast, past the communities of Moapa, Glendale, and Logandale, before emptying, near Overton, Nevada, into the northern arm of Lake Mead.

Coal combustion wastes (CCW) contain the following chemicals, all of which can be toxic depending on exposure: aluminum, antimony, arsenic, barium, beryllium, boron, cadmium, chloride, chromium, cobalt, lead, manganese, mercury, molybdenum, nickel, selenium, thallium, vanadium, and zinc. CCW also contains radioactive isotopes. Prolonged exposure to these metals can cause several types of cancer, heart damage, lung disease, respiratory distress, kidney disease, reproductive problems, gastrointestinal illness, birth defects, impaired bone growth in children, nervous system impacts, cognitive deficits, developmental delays and behavioral problems. CCW also contains polycyclic aromatic hydrocarbons (PAHs), a group of chemicals formed from the incomplete combustion of coal. These include, among other compounds, benz[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, benzo[j]fluoranthene, benzo[k]fluoranthene, chrysene, dibenz[a,h]anthracene, and indeno[1,2,3-c,d]pyrene, chemicals that may cause cancer in persons exposed through inhalation or ingestion of particles or dust to which the chemicals adhere.

The Defendants' past and present handling, storage, treatment, transportation and disposal of solid and hazardous wastes at the facility are contaminating the environment, including off-site areas, with toxic wind-borne dust and particulates, contaminating surface water and groundwater (including potential drinking water), and present an imminent and substantial endangerment to health and the environment. The major sources of contamination at the Reid

Gardner Facility include the coal ash landfill, the wastewater ponds, truck transportation of coal ash, piping of wastewater, storage and transportation of coal, and other operations at the generating station.

Neither EPA nor the State of Nevada is diligently prosecuting Owners under RCRA or the CWA for their violations described herein.

The violations of law described above and herein are based upon the best information currently available to Citizens. Each of the types of violations is ongoing or reasonably likely to continue, and we expect that discovery will identify additional RCRA and CWA violations. Citizens intend to sue for all violations, including those yet to be uncovered and those committed after the date of this notice. Due to the chronic and persistent nature of this Facility's violations, there is more than a reasonable likelihood of ongoing violations in the future.

### **A. The Coal Ash Landfill**

The 91-acre Class III industrial waste landfill is located on the Mesa south and approximately 150 feet higher in elevation than the generating station and the Muddy River that runs between the landfill and the plant. NV Energy has been disposing of approximately 310,000 cubic yards (CY) per year of coal combustion waste at its Reid Gardner on-site landfill since 1965.<sup>1</sup> The CCW wastes include bottom ash, fly ash, boiler slag, and solids dredged from the wastewater ponds. To date, NV Energy has disposed of approximately 1.2 million CY of coal combustion and related wastes (CCW) in its landfill. To make room for an estimated additional 35 years of coal burning, the local solid waste management authority recently permitted NV Energy to enlarge its landfill area and capacity sufficient to dispose of an additional 11.6 million CY of CCW and related material in the Reid Gardner landfill. Under the expansion plan, NV Energy plans to place an additional 50-vertical feet of waste on top of the existing unlined landfill -- allowing disposal of approximately 7 million CY of additional CCW and related wastes.

### **B. The Wastewater Ponds**

NV Energy discharges approximately 490,000 gallons of wastewater per day to a series of 13 evaporation ponds at the Facility. The wastewater derives from operation of the wet scrubbers, cooling tower blow-down, the bottom ash transport system, and fly ash residues.

NV Energy retains for the Facility a state waste discharge permit, a state air quality dust control permit, and a local landfill permit. In addition, it undertakes activities aimed to remediate past groundwater contamination under a 2008 administrative order on consent (AOC) with the State of Nevada. Despite the permit and AOC requirements, however, NV Energy's operations of the Facility continue to endanger the adjacent community, public health, and the environment. Contamination of the shallow groundwater aquifer has been caused by the Facility's historic and

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<sup>1</sup> The landfill also accepts reactivator solids, construction and demolition debris, and asbestos-laden materials. Southern Nevada Health District, Class III Disposal Permit LF006-CMF-01, issued September 9, 2011 to NV Energy.

continuing seepage from ponds to which the Facility discharges wastewater laden with salts, metals and other substances from fly ash, wet scrubbers, cooling tower blow-down, and other processes. Moreover, dried solids and particles lift off from the ponds or their edges and blow frequently with the wind towards the community center of the reservation. In addition, hydrogen sulfide gas is generated by bacteria in the ponds and is blown into the tribal reservation.

### **C. Coal Ash Haul Trucks**

When the Reid Gardner plant is burning coal for electricity generation – or simply to reduce the coal that is mounting in ever-expanding piles due to long-term coal-purchase contracts and low demand for coal-generated electricity – the facility generates approximately 20 haul-truck loads per day (37 cubic yards/load) of coal ash that is hauled to the coal ash landfill. The haul roads are themselves compacted coal ash. Dust is generated by the haul truck by, among other things, their displacement of coal ash as the trucks move over the roads and from wind blow-off of coal ash when it is loaded onto or carried by the trucks.

### **D. Other Facility Operations**

#### **1. Coal Piles**

NV Energy maintains at least three massive, uncovered and unlined coal piles at the Reid Gardner facility. These piles store coal, at minimum, from the following sources: (a) the West Ridge Mine in central Utah for use in Units 1-4, (b) the Black Thunder Mine in the Southern Powder River Basin, Wyoming, and the Sufco Mine in Central Utah for use in Units 1-3, and (c) the Sufco and Skyline Mines in Central Utah, and the West Elk Mine in Western Colorado for use in Unit 4. The coal piles are located to the north of the Muddy River, on bare ground with no impermeable liner separating them from the soil. Upon information and belief, Citizens believe that the coal piles are causing or contributing to contamination of (a) the groundwater under the Facility site and down gradient and off the Facility site, (b) the Muddy River and, through fugitive releases, (c) coal dust contamination in portions of the Moapa Tribal Reservation.

#### **2. Coal Train Cars**

NV Energy retains, through 2014, a contract with Union Pacific Railroad to deliver coal from its various sources. For this purpose, NV Energy leases a total of 205 coal cars from Flagship Rail Services, LLC and Mitsui Rail Capital, LLC, and further utilizes rail cars provided by Union Pacific for the purpose of delivering coal from mining operations in Colorado, Utah, and Wyoming to the Reid Gardner facility. Upon information and belief, the transportation and discharge of coal by rail for use or storage at the Reid Gardner facility causes or contributes to contamination by fugitive coal dust and associated pollution and contamination of the environment in the region, including contamination of portions of the Moapa Tribal Reservation.

### **E. Summary**

The dust, particles, leakage, leachate, and gases from the landfill, haul trucks, wastewater ponds, coal piles, and coal trains repeatedly and substantially endangers public health of Citizens and others downwind or downstream. For similar reasons, this pollution also endangers the health of wildlife and plants in the region.

Together, operations at Reid Gardner violate the standards of the Resource Conservation and Recovery Act (RCRA) and related statutes and regulations in at least two respects, as described in further detail below. First, operations at the Facility may, and in fact do, imminently and substantially endanger health and the environment; second, Owners are operating an open dump. In addition, the Facility's operations contaminate the Muddy River by discharging of pollutants into waters of the United States without a NPDES permit in violation of the Clean Water Act.

## **II. OWNERS' OPERATIONS OF THE REID GARDNER FACILITY PRESENT AN IMMINENT AND SUBSTANTIAL ENDANGERMENT TO HEALTH AND THE ENVIRONMENT.**

RCRA section 7002(a)(1)(B) authorizes citizen suits against any person, "including any past or present owner or operator of a treatment, storage or disposal facility, who has contributed or who is contributing to the past or present handling, storage, treatment, transportation, or disposal of any solid or hazardous waste which may present substantial endangerment to health or the environment." 42 U.S.C. § 6972(a)(1)(B).

In this case, Owner's handling, storage, treatment, transportation, and disposal of coal combustion wastes and storage and use of coal at the Facility have contaminated and continue to contaminate the land in the area with toxic coal dust, have polluted and continue to pollute ground water, and have endangered and continue to substantially endanger surface water quality. These actions cause or contribute to an imminent and substantial endangerment to health and the environment.

There may be additional sources, which the Owners are or should be aware of, not listed below, that may also be contributing to the pollution and that may be discovered in the course of further investigation and through the litigation discovery process. These may form part of the basis for additional claims without further notice to the Owners.

### **A. Toxic Dust Contamination from the Coal Ash Landfill and Haul Trucks, and Solid Waste Blow-Off from Wastewater Pond, Harms Public Health**

Members of the Moapa Band of Paiutes are forced, with considerable frequency, to shutter themselves indoors when southeasterly winds blow fugitive coal ash dust and particulates from the coal ash landfill and wastewater ponds toward their homes and community center. Tribal members with asthma and other respiratory and cardiovascular diseases take special care to avoid exposure and, when exposed, rely on medications and inhalers to allow them to breathe.

### **1. Coal Ash Landfill Dust Contamination**

The Facility's operations place Reid Gardner's toxic coal combustion wastes directly in the path of winds that carry the dust into the homes and lungs of the members of the Moapa Band of Paiutes. The Reid Gardner coal ash landfill is located on the mesa south and approximately 150 feet higher in elevation than the generating station and the Muddy River that runs between the landfill and the plant. Approximately 20 uncovered loads of coal ash per day are trucked to the landfill over unpaved haul roads. The landfill is also higher in elevation and southeast of the community center of the Moapa Band of Paiutes. CCW dust is generated, among other times, when the landfill surface is dry, disturbed by landfill activities, driven upon by haul trucks, or when ash escapes or is blown from the haul trucks. Winds in the vicinity of Reid Gardner are frequently southerly and southeasterly, so that ash mobilized by the winds frequently blows into the Moapa community. Such winds prevail especially during summer months when higher temperatures and lower humidity increase the likelihood of fugitive dust releases.

### **2. Wastewater Pond Dust and Particulate Contamination**

Reid Gardner Station generates wastewater from the wet scrubbers, cooling tower blow-down and fly ash residues. The wastewater is discharged to a series of evaporation ponds. Solids in the ponds are dredged and placed on the landfill. Pond solids -- forming on the sides of ponds as liquids evaporate, entrained in droplets as liquids evaporate, or made air-borne by blowing wind -- are carried by the wind from the wastewater ponds to the community center of the Moapa Band of Paiutes.

### **3. Wind Events Contaminating the Reservation with Coal Ash Dust and Wastewater Particulates**

Contamination by CCW dust and particulates from the landfill and ponds occurs routinely and regularly, and without notice to potentially impacted residents of the nearby Tribe. During high wind events, residents and visitors to the Moapa Band of Paiutes Reservation have observed dust from the vicinity of the landfill sweeping towards them. This occurred, among other dates, on Sept. 19, 2008, April 14, 2009, April 23, 2009, April 20, 2010, Dec. 13, 2010, July 30, 2010, April 7, 2011 and February 13, 2012.

## **B. Leaching of Contaminants Endangering Groundwater**

The Reid Gardner Facility's coal ash landfill, wastewater ponds and coal piles have contaminated and continue to contaminate groundwater. Monitoring wells show high levels of pollutants at levels that exceed state and federal standards, including arsenic at levels 9 times higher than the lenient state action level and 140 times the federal SDWA standard. This contamination presents or may present an imminent and substantial endangerment to health and the environment.



## **1. Background on Groundwater Contamination and State Action Levels at Reid Gardner**

The Reid Gardner facility has been polluting groundwater in the area since it first came online in 1965; contamination from the coal ash pond and wastewater ponds continues unabated.

Remediation of historical contamination of groundwater is the subject of a 2008 NDEP-NV Energy administrative order on consent.<sup>2</sup> However, the AOC has not halted continuing contamination of the groundwater aquifer by the Facility and, by its terms, it “in no way relieves” Owners of their responsibility to comply with federal law.” AOC at 41.

Separate from the AOC, the State has set “action levels” for “contaminants of concern” to remediate the quality of groundwater that has been contaminated by the Reid Gardner facility. Pursuant to state regulations, action levels must be set at levels equivalent either to background conditions or else at “[a]n appropriate level of concentration” based on “protection of public health and safety and the environment” accounting for the presence of multiple pollutants and “other potential threats” to groundwater or to other “sensitive areas of the environment.” NAC 445A.22735(1)(c). Citizens dispute that the action levels established by the State are sufficient to protect groundwater quality because those levels are based, improperly, on 2003 monitoring data instead of natural background conditions, and because the levels are far more lenient than federal maximum contaminant levels (MCLs) that are set to protect public health. The number and severity of exceedances would be more numerous and egregious still, if action levels for Reid Gardner were set at levels that more properly reflect contaminant concentrations typical of the groundwater aquifer prior to development of the Facility.

Still, although the action levels for Reid Gardner are too lenient, examination of only a portion of the monitored well data reveals that there were over 7,000 exceedances reported to the Nevada Division of Environmental Protection in the period 2008 to present, covering several harmful pollutants, including chloride, sulfate, total dissolved solids, arsenic, boron, chromium, manganese, magnesium, molybdenum, selenium, and sodium. Owners’ exceedances of established contaminant state action levels are serial and egregious.

See Map 1 for a depiction of monitoring wells in relation to the Reid Gardner Facility, including the wastewater ponds, coal ash landfill and coal piles.

## **2. Information on Contaminants of Concern Discharged to Groundwater by Reid Gardner Sources**

- Arsenic
  - Inorganic arsenic, a metalloid, is a known human carcinogen whose ingestion can increase the risk of skin cancer and cancer in the liver, bladder, and lungs and

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<sup>2</sup> Administrative Order on Consent (AOC) between NDEP and NV Energy (Feb. 22, 2008) at [www.ndep.nv.gov/bca/reid\\_gardner.htm](http://www.ndep.nv.gov/bca/reid_gardner.htm).



whose inhalation can increase the risk of lung cancer. Other health effects from exposure, including ingestion, include stomachache, nausea, vomiting, and diarrhea. Long-term exposure to arsenic can lead to patches of darkened skin and the appearance of warts on the hands, feet, and body. Other effects include decreased production of red and white blood cells, which may cause fatigue, abnormal heart rhythm, blood-vessel damage resulting in bruising, and impaired nerve function.

- The federal Safe Drinking Water Act (SDWA) primary maximum contaminant level (MCL) for Arsenic is 0.01 mg/L, while the state action level set for Reid Gardner is 16 times more lenient at 0.16 mg/L. **Concentrations of arsenic up to 1.4 mg/L (approximately 9 times higher than the lenient state action level and 140 times the federal SDWA standard) have been reported recently in monitoring wells adjacent to the wastewater ponds.**

- Boron

- Inorganic Boron is a metalloid that has not been identified as a probable carcinogen and is believed at low doses to have low toxicity in mammals, and yet is highly toxic to insects and plants.
- With respect to high dosages, the U.S. EPA has determined that “[a]n acute overdose to infants has caused diarrhea, vomiting, signs of irritability, erythema in the diaper area, a mild red rash on the face and neck, a pus-like discharge or mild congestion of the eye, and possibly convulsive seizures. In adults, an acute overdose causes nausea, vomiting, redness of the skin, difficulty swallowing due to ulcers in the throat, and a non-bloody diarrhea. In animals, acute excessive exposure has caused lethargy, rapid respiration, eye inflammation, swelling of the paws, shedding of the skin on the paws and tails, excitation during handling, and changes in the cells of the forestomach.” With respect to lower dosages, EPA has warned of a “risk for the potential effect on the testes of young males” and a “risk for the potential effect on the fetuses of pregnant women” when water contaminated with Boron concentrations greater than 2 mg/L is consumed over the long term.
- The EPA has not established a federal RCRA or SDWA maximum contaminant level for Boron. The 2003 state-established action level for Boron contamination at Reid Gardner of 1.4 mg/L is substantially more lenient than the standard set in other jurisdictions. Both California and Europe, for example, have set their Boron drinking water standards at 1.0 mg/L. **Concentrations of Boron up to 820 mg/L (585 times higher than the lenient Nevada action level standard) for Reid Gardner have been reported recently in monitoring wells adjacent to the wastewater ponds.**

- Chromium

- Chromium, a transition metal, is found naturally in the environment in two forms, a nonsoluble form known as trivalent chromium (also known as chromium 3 or Cr(III)) and a readily soluble form known as hexavalent chromium (also known as chromium six, or Cr(VI)). According to EPA, Cr(III) has “relatively low toxicity and would be a concern in drinking water only at very high levels of contamination [while Cr(VI)] is more toxic and poses potential health risks.” A major federal study in 2008 suggested, according to EPA, that Cr(VI) may be a human carcinogen if ingested.
- In a 2011 study, Stanford University researchers noted that due to “its oxidizing capability [Cr(VI)] can have severe adverse effects on the human body, including cancerous tumor formation and gene damage.” These researchers observed that while chromium is normally found in coal “entirely in the trivalent oxidation state, Cr(III),” in the combustion process “there is the potential for greatly increasing the health risk associated with chromium. . . . [N]ot only can its concentration in the ash be increased by up to 10 times compared to that in the original coal, but Cr(III) can also be oxidized during coal combustion to Cr(VI), which poses a much greater threat to public health.”
- The RCRA MCL is 0.05 milligrams per Liter (mg/L) or 50 parts per billion (ppb), for total chromium. The state action level for Reid Gardner is 0.1 mg/L – the same as the SDWA primary MCL. **Concentrations of chromium at and above the state action level have been reported recently in monitoring wells in the vicinity of the landfill, with a highest reading of 0.11 mg/L or approximately 2.2 times the RCRA MCL.**

- Manganese

- Manganese, a transition metal, is an essential nutrient, but chronic exposure to high doses may harm human health – depending on routes of exposure, age of victim, and nutritional status. Manganese toxicity appears to target the nervous system, and at least one study of ingestion of manganese-contaminated well water found neurological effects including lethargy, tremor and mental disturbance.
- The state action level for Reid Gardner contamination of groundwater by manganese is 0.27 mg/L, five times more lenient than the SDWA secondary MCL of 0.05 mg/L. **Recent concentrations of manganese found in Reid Gardner monitoring wells were reported at 7.8 mg/L, or approximately 29 times the lenient state action level.**

- Molybdenum

- Molybdenum, a transition metal, has not been the subject of a MCL determination by EPA, although as a prudent guideline the agency has recommended that drinking water contain less than 0.05 mg/L. Professional health recommendations counsel avoiding inhalation of dust laden with molybdenum, while workers who

have been chronically exposed to molybdenum-laden dust have experienced weakness, fatigue, headache, anorexia, and joint and muscle pain.

- The NDEP-issued action level for molybdenum concentration in groundwater contaminated by Reid Gardner pollution, set in 2003, is 0.03mg/L. **Recent concentrations of molybdenum found in Reid Gardner monitoring wells were reported at 18.0 mg/L (600 times the state action level).**
- Selenium
  - Selenium, a nonmetal chemical element, can be toxic if consumed in excessive amounts. EPA warns that “people who drink water containing selenium in excess of the MCL over many years could experience hair or fingernail losses, numbness in fingers or toes, or problems with their circulation.”
  - The MCL set in RCRA for selenium is 0.01 mg/L. The action level set by NDEP for contamination of groundwater by Reid Gardner pollution is 0.05 mg/L – the same as the SDWA primary MCL. **Recent concentrations of selenium found in Reid Gardner monitoring wells were reported at 3.5 mg/L (70 times the state action level and 350 times the RCRA MCL).**
- Sulfate
  - Water contaminated with high levels of sulfate poses a variety of health threats to humans and animals. For humans, a sulfate level of over 250 mg/L can cause a temporary laxative effect while consuming water containing over 700 mg/L may cause a consistent laxative effect. EPA recommends “[a] health-based advisory for acute effects (absence of laxative effects) of 500 mg of sulfate/L.”
  - The SDWA secondary MCL for sulfate is 250 mg/L, while the far more lenient state action level for Reid Gardner is 1070 mg/L. **Recent concentrations of sulfate found in Reid Gardner monitoring wells were reported up to 100,000 mg/L (103 times the lenient state action level and 440 times the federal drinking water MCL).**
- Total Dissolved Solids
  - TDS is a measure of all dissolved minerals in water. The World Health Organization has warned that where the TDS content of water that may be used for drinking is very high, the individual constituents should be identified and the local public health authorities consulted.
  - The SDWA secondary MCL for TDS is 500 mg/L, while the far more lenient state action level for Reid Gardner is 2570 mg/L. **Recent concentrations of TDS found in Reid Gardner monitoring wells were reported up to 208,000 mg/L (81 times the lenient state action level and 416 times the federal drinking water MCL).**

### 3. Exceedances of State and Federal Contamination Level Standards

The quarterly monitoring reports show thousands of exceedances of state-set action levels and, by direct implication, of associated federal MCLs. Table 2 and Exhibit I shows Reid Gardner's exceedances of state-action levels, and Exhibit II shows exceedances of federal MCLs set under RCRA and the Safe Drinking Water Act (SDWA).

Groundwater-monitoring reports submitted by NV Energy to the Nevada Division of Environmental Protection for the Reid Gardner facility systematically under-report the number of exceedances of state-set action levels for chemicals deemed by the State to be contaminants of concern. This is due, in part, to the fact that the testing procedures utilized by NV Energy to analyze samples employ reporting limits that routinely exceed state-set action levels for Reid Gardner. Accordingly, where NV Energy reports to the State that a contaminant was not detected in a groundwater sample, this simply does not establish that its concentration is below the state-set action level. For its groundwater monitoring reports during the 2008-2012 period NV Energy repeatedly utilized such inappropriate higher-than-action-level reporting limits for at least arsenic, boron, manganese, molybdenum, selenium, and sulfate.

There are also federal maximum contaminant levels established under RCRA and the Safe Drinking Water Act (SDWA). The federal standards are either as stringent as, or more stringent than, the state action levels for Reid Gardner. *See* Table 1, below. Accordingly, for contaminants of concern with associated federal MCLs, an exceedance of an action level set by the State of Nevada for Reid Gardner groundwater contamination is also an exceedance of any corresponding federal MCL.

**Table 1: Groundwater Contamination at Reid Gardner**

Groundwater Constituent	Federal Maximum Contaminant Level (mg/L)	State Action Level (mg/L)
Chloride**	250	520
Sulfate**	250	1020
Total Dissolved Solids**	500	2570
Arsenic*	0.01	0.16
Boron	--	56
Chromium***	0.05	0.1
Magnesium	--	165
Manganese*	0.05	0.27
Molybdenum	--	0.03
Selenium***	0.01	0.05
Sodium	--	520

-- Federal MCL is Not Established

\* Parameter Subject to Federal Safe Drinking Water Act (SDWA) Primary Standard

\*\* Parameter Subject to SDWA Secondary Standard

\*\*\* Parameter Subject to RCRA Standard that is More Stringent than the SDWA Standard

Moreover, the laboratory-analytic reporting limit issue described above also defeats any

attempt to gain an accurate accounting of the Facility's exceedances of RCRA MCLs and SDWA MCLs for arsenic, manganese, selenium, and sulfate (among contaminants with reporting limits inadequate even to fully identify state action level exceedances), and also for chromium, chloride and total dissolved solids.

In sum, reported exceedances of the state-set action levels at Reid Gardner also constitute, for contaminants that are also subject to federal standards, exceedances of relevant federal maximum contaminant levels. But the analytic/methodological decisions adopted by NV Energy systematically undercount exceedances of state action levels for at least three of the contaminants of concern, and further cause the reports for every contaminant of concern at Reid Gardner that is also subject to a federal MCL to be an undercount of exceedances of federal MCLs.

Notwithstanding the systematic underreporting, the quarterly monitoring reports show thousands of exceedances of state-set action levels and, by direct implication, of associated federal MCLs. For example, in the most recent five-year period, 2008 - 2012, NV Energy monitoring reports submitted to NDEP show that state action levels for contaminants of concern were exceeded on numerous occasions. Over this period there were more than 7,000 reported exceedances of state action level concentrations in groundwater samples for chloride, sulfate, total dissolved solids, arsenic, boron, chromium, magnesium, manganese, molybdenum, selenium, and sodium, with detected concentrations often substantially in excess of state action levels. *See* Table 2 below for summary results and Exhibit 1 to this notice letter for further detail.

Groundwater Contaminant	2008 Q1	2008 Q2	2008 Q3	2008 Q4	2009 Q1	2009 Q2	2009 Q3	2009 Q4	2010 Q1	2010 Q2	2010 Q3	2010 Q4	2011 Q1	2011 Q2	2011 Q3	2011 Q4	2012 Q1	2012 Q3	Total
Chloride	36	34	33	37	34	34	30	33	0	35	31	32	30	29	46	51	48	43	616
Sulfate	54	57	51	61	54	55	51	59	52	58	50	56	49	45	66	73	68	70	1029
TDS*	55	53	48	55	51	51	45	54	49	54	47	54	46	41	64	71	69	67	974
Arsenic	18	17	18	27	24	17	10	13	15	9	16	16	20	18	28	31	27	23	347
Boron	60	59	54	62	57	60	51	59	56	59	54	56	53	50	69	75	71	72	1,077
Chromium	1	1	1	1	1	1	0	1	0	NL	NR	NR	NR	1	0	1	1	0	10
Magnesium	41	39	34	39	41	38	32	37	35	41	41	39	31	26	51	55	54	53	727
Manganese	25	29	24	28	22	23	24	20	20	21	24	26	23	22	27	34	34	35	461
Molybdenum	56	60	51	61	55	56	49	60	51	58	45	52	46	45	62	73	64	67	1,011
Selenium	8	3	11	0	1	2	0	1	2	0	NR	NR	NR	0	8	6	8	43	93
Sodium	55	55	48	55	52	53	46	51	47	53	45	48	40	52	61	69	66	66	962
<b>Total Exceedances</b>	<b>409</b>	<b>407</b>	<b>373</b>	<b>426</b>	<b>392</b>	<b>390</b>	<b>338</b>	<b>388</b>	<b>327</b>	<b>388</b>	<b>353</b>	<b>379</b>	<b>338</b>	<b>329</b>	<b>482</b>	<b>539</b>	<b>510</b>	<b>539</b>	<b>7307</b>
* Total Dissolved Solids																			
Source: NV Energy Quarterly Reports to Nevada Division of Environmental Protection																			

The count of total exceedances of state-set action levels would be higher still if additional heavy metal contaminants reported by NV Energy were included in the tally. For example, in the third Quarter of 2008, NV Energy's monitoring reported 11 exceedances for Titanium.<sup>3</sup> Similarly, in the first two quarters of 2010, the company's submitted reports showed 16

<sup>3</sup> Third Quarter 2008 Discharge Monitoring Report (DMR) Table 5.

violations of the state action level for Vanadium.<sup>4</sup> Citizens intend to allege all such additional exceedances of state or federal standards in the ensuing litigation without further notice to Defendants.

Prior to the second quarter of 2011, NV Energy submitted to NDEP quarterly summaries of its exceedances of groundwater action levels for parameters of concern. NV Energy summaries may undercount the company's actual exceedances found in its data tables. If warranted by further evaluation of the submitted data, Citizens intend to allege in the course of the noticed suit a higher number of such exceedances as reported to NDEP without further notice.

Analysis of NV Energy's monitoring report data also establishes that, during the 2008-12 period, there were, at minimum, an additional six exceedances of the RCRA MCL for chromium – additional, that is to say, beyond the number of exceedances of the less stringent state action standards set by NDEP for Reid Gardner remediation -- as well as a minimum of 262 additional exceedances of the RCRA MCL for selenium. The data also establishes that there were, in the same five-year time span, at minimum, an additional 289 exceedances of the RCRA MCL or SDWA primary MCL for arsenic. For each of these contaminants, the RCRA MCL is more stringent, i.e., more protective of health and the environment, than is the state-set action level for Reid Gardner. As well, the RCRA MCL is more stringent than the current SDWA standards for two contaminants, chromium and selenium.

Further analysis of the data over the same period also establishes that there were a minimum of an additional 128 exceedances of the SDWA secondary MCL for chloride, 43 such additional exceedances for sulfate, 60 for TDS, and 108 for manganese. For each of these constituents, the federal SDWA secondary MCL is more stringent than the state-set action level for Reid Gardner groundwater remediation.<sup>5</sup>

Exhibit II provides a listing of monitoring well sampling results demonstrating these additional exceedances (that is, exceedances beyond those listed in Exhibit I) of the RCRA MCLs for arsenic, chromium, and selenium and of the SDWA MCLs for arsenic, chromium, chloride, sulfate, manganese, selenium and TDS.

In addition, as discussed above, NV Energy's monitoring data was analyzed with reporting limits that often exceed MCL standards for contaminants of concern under RCRA or the SDWA. Accordingly, data reports signifying merely that the result is less than a reporting limit do not establish that a particular sample's concentration for a contaminant of concern is less than either the RCRA or the SDWA MCL. Each such reading therefore constitutes a *potential* exceedance of RCRA or SDWA standards. Citizen's analysis of NV Energy's reported data, for the 2008-12 period, establishes that there were, again, at minimum, the following *potential* additional exceedances: 93 of arsenic, 8 of chromium, 39 of manganese, and 348 of selenium.

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<sup>4</sup> First Quarter 2010 DMR Table 5 and Second Quarter 2010 DMR Table 5

<sup>5</sup> The SDWA primary MCL for arsenic is also more stringent than the RCRA MCL for that contaminant.



Finally, upon information and belief, Citizens understand that NV Energy has within its control other data establishing additional instances of environmental contamination of a similar nature, and Citizens may bring suit on additional claims on the basis of that information without further notice.

#### **4. Major Sources of Groundwater Contamination at the Reid Gardner Facility**

Major sources of groundwater contamination at the Reid Gardner facility include the coal ash landfill, the wastewater ponds, and the coal pile and other operations at the generating station itself.

##### **a. Coal Ash Landfill**

Water migrating down through the CCW landfill produces leachate laden with heavy metals and other pollutants that seeps out of the bottom of the landfill and migrates to the shallow groundwater aquifer. The 91-acre coal ash landfill at Reid Gardner is unlined. In order to control coal ash dust from landfill operations, NV Energy frequently and actively applies water to moisten working areas of the landfill, totaling in excess of 20 million gallons per year. That watering results in approximately 4.5 million gallons per year of leachate formation under each active acre. Even for non-working portions of the unlined landfill, where watering is only through natural precipitation, an estimated 8.9 thousand gallons of leachate are generated under each landfill acre.

Groundwater monitoring wells that are upgradient from the generating station and wastewater ponds, but downgradient from the landfill detect contamination only from the landfill, and not from the generating station or the wastewater ponds. See Map 1. Several of these – LMW-2, LMW-4R, LMW-3, LMW-5R, LMW-6R, LMW-8R, KMW-12, KMW-16 – show levels of ground-water quality parameters that substantially exceed state action-level concentrations for boron, molybdenum, sodium, sulfate, total dissolved solids (TDS) and/or vanadium.

##### **b. Wastewater Ponds**

The synthetically lined wastewater ponds at Reid Gardner have been leaking and continue to leak into groundwater underneath and in the floodplain of the Muddy River, thereby contaminating the area's shallow aquifer. Reporting by NV Energy of the leak detection systems on these ponds establishes that the liners regularly fail to contain wastes. Moreover, correlation of contaminant levels in leaking ponds with fluxes of contaminant concentrations in groundwater establishes that the ponds are contaminating the shallow aquifer. Among other monitoring wells, those adjacent to wastewater ponds E-1 and E-2 show exceedances for TDS during the 2005-2010 period ranging from 10 to 62 times the state action level set for this pollutant at Reid Gardner. In the second quarter of 2010, to cite another set of examples, Wells P-6R, P-7R and P-8R at the base of Ponds E1 and E2 all showed exceedances of arsenic, boron, chloride, magnesium, molybdenum, sodium, sulfate, and total dissolved solids. *See* Table 3.

**Table 3: Contamination adjacent to Ponds E1 and E2**

Pollutant	Federal Drinking Water Level	State Action Level mg/L	P-6R	Excess Factor Over State Level	P-7R	Excess Factor Over State Level	P-8R	Excess Factor Over State Level
	mg/L		mg/L		mg/L		mg/L	
Arsenic	0.01	0.16	0.54	3.4	0.32	2.0	<	N/A
Boron	--	1.4	240	171.4	440	314.3	290	207.1
Chloride	250**	520	5100	9.8	4700	9.0	5100	9.8
Magnesium	--	165	2800	17.0	1400	8.5	2200	13.3
Manganese	0.05	0.27	4.6	17.0	2.6	9.6	<	N/A
Molybdenum	--	0.03	1.3	43.3	0.67	22.3	1.7	56.7
Sodium	--	520	29,000	55.8	38,000	73.1	28,000	53.8
Sulfate	250**	1070	64,000	59.8	86,000	80.4	51,000	47.7
TDS*	500**	2570	100,000	38.9	130,000	50.6	82,000	31.9

<Asserted to be non-detectable, but see text in II.B.3.

\*Total Dissolved Solids

\*\*Chloride, Sulfate and TDS retain only national secondary drinking water standards

**Sampling performed in wells downgradient the wastewater ponds utilized for Units 1, 2, and 3, has detected at least 1964 exceedances of the state action levels for contaminants of concern from the period beginning with Q1 2008 through the present.**

### **c. The Generating Station, Including Adjacent Coal Piles**

Operations at or adjacent to the Facility, including its coal piles, is also causing or contributing to the pollution of ground and surface water. First, maintenance of the coal pile immediately adjacent to the plant contaminates the hydrologically-connected ground and surface-water system. To suppress dust, the coal pile and the conveyor belt are constantly watered. Coal contains easily dissolvable contaminants that migrate with the dust-control water into the groundwater system; these contaminants, including arsenic, boron, magnesium, molybdenum, and selenium, are detected in Spring SG-1 and sampling downstream of the Facility at levels that exceed state action and federal maximum contaminant levels. This process is amplified each time it rains; the coal pile is porous and atop barren soil, and so without vegetative absorption of the contaminated water to slow contaminant migration to the water table.

Well HM-53 is located southeast of the coal piles, downgradient, and north of the Muddy River. In the most recently submitted sampling report, third Quarter 2012, HM-53 showed contamination exceeding state action levels across multiple constituents, including arsenic, boron, magnesium, molybdenum, sodium, sulfate, and TDS. The downgradient location of well HM-53 and the direction of groundwater flow indicate that the elevated levels of contaminants in this well are attributable to the coal pile.



Well HM-53 is near the edge of NV Energy's property, and well IMW-16S, which is on the south side of the Muddy River, is offsite. Well IMW-16 also reported contamination across multiple constituents in the third quarter 2012 report, including arsenic, boron, chloride, magnesium, molybdenum, sodium, sulfate, and TDS. There is a clear hydrogeological connection between the shallow groundwater and the Muddy River. Thus, the elevated levels of contaminants in the two wells downgradient of the coal pile, one of which is south of the Muddy River, indicate that the contamination is reaching the Muddy River and subsequently moving offsite.

### **C. Contamination of Surface Water**

As discussed below in Section III, groundwater contamination from the coal ash landfill, the wastewater ponds, the coal piles, conveyors and other parts of the Facility has also contaminated and continues to contaminate the Muddy River. There is a hydrologic connection between the shallow groundwater aquifer adjacent to the Muddy River and the river itself. The direction of the gradient, or slope, of the top of the shallow aquifer underneath the Reid Gardner site is towards the Muddy River. In addition, the groundwater to the east of the wastewater ponds on the floodplain flows towards and discharges into the Muddy River. Comparison of the Muddy River downstream of the Facility with upstream sampling confirms that the Facility is contaminating the river with TDS, arsenic, aluminum, barium, boron, calcium, chloride, iron, magnesium, manganese, molybdenum, and sulfate.

NV Energy and the responsible state and federal agencies possess additional specific data indicating surface water contamination. This information will be used in future actions by Citizens.

### **D. The Facility's contamination of groundwater and surface water constitutes harm to human health and the environment**

Groundwater under the Reid Gardner Facility has been contaminated for many years and continues to be contaminated. As laid out in detail above, monitoring wells consistently show contamination at levels that exceed state and federal standards that are set to protect human health and water quality. Sampling of surface water around the Facility confirms that the Muddy River is also contaminated.

Together, the operations described above, and potentially others that the Owners are aware of but are not listed herein, contribute water to the ground and surface water systems that carry pollutants with them in a way that presents or may present an imminent and substantial endangerment to health and the environment. The operations described above also violate federal RCRA regulations that prohibit a facility from contaminating an underground drinking water source. 40 C.F.R. § 257.3-4(a). Citizens intend, at the close of the ninety (90) day statutory waiting period, to file a citizen suit under Section 7002 of RCRA, 42 U.S.C. § 6972, against Owners for their past or present contribution to the endangerment of health or the environment, and to seek thereby injunctive relief, statutory maximum civil penalties, costs, attorney and

expert witness fees, and such additional relief as the court determines is appropriate.

### **III. THE REID GARDNER FACILITY DISCHARGES POLLUTANTS TO THE MUDDY RIVER IN VIOLATION OF THE CLEAN WATER ACT**

As indicated above, Section 301 of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of any pollutant from a point source into waters of the United States unless such discharge is permitted in, and in compliance with, a National Pollutant Discharge Elimination System (NPDES) permit.

Owners have contaminated the Muddy River, a water of the United States, through unpermitted discharges to the hydrologically-connected shallow on-site groundwater aquifer. The aquifer is below and adjacent to the Facility -- including its wastewater ponds, landfill, coal pile, conveyors, rail locations, generating station, and other parts of the Facility -- and it is also adjacent to the Muddy River itself.

The direction of the gradient, or slope, of the top of the shallow aquifer underneath the Reid Gardner Facility is towards the Muddy River, and the River intersects the groundwater aquifer at several locations within the reach of the Facility, including south of the coal pile between monitoring wells HM 53 on the north bank and IMW 16 on the south bank. In addition, the groundwater to the east of the wastewater ponds on the floodplain flows toward and discharges into the Muddy River. Comparison of sampling in the Muddy River downstream of the Facility with upstream samples confirms that the Facility is contaminating the river with TDS, arsenic, aluminum, barium, boron, calcium, chloride, iron, magnesium, manganese, molybdenum, and sulfate.

Reid Gardner's discharges of contaminants to the hydrologically-connected aquifer have occurred continuously from 2008 to the present from several or all of the following wastewater ponds, each of which constitutes a separate point source: Pond 4A adjacent to the north bank of the Muddy River; Ponds 4B-1, 4C-1 and 4C-2, D, E-2, F and G alongside or partly adjacent to the south bank of the Muddy River; and Ponds 4B-2 and 4B-3 to the south of the Muddy River. Continuous discharges have occurred and continue to occur to the hydrologically-connected groundwater aquifer -- and thereby, to the Muddy River -- from contaminated leachate percolating through the coal piles adjacent to north bank of the Muddy River. Continuous discharges have occurred and continue to occur to the hydrologically-connected groundwater aquifer -- and thereby, to the Muddy River -- from contaminated leachate percolating through the coal ash landfill and coal-ash-constructed haul roads. Such unlawful discharges are evident and shall be established by, among other sources of information, NV Energy contour maps showing established shallow groundwater elevations and shallow groundwater concentrations for dissolved arsenic, magnesium, manganese, selenium, sodium, sulfate, and total dissolved solids, groundwater monitoring analytical information and Muddy River water quality sampling analysis. Owners do not have a NPDES permit for the discharges alleged herein.

Upon information and belief, additional specific data indicating surface water contamination from the same or additional facility sources -- either through direct discharges to

the Muddy River or discharge from facility sources to the Muddy River through the hydrologically-connected groundwater aquifer – is in the possession of Owners and the responsible state and federal agencies and will be used in future actions by Citizens.

Citizens allege that a history of violations, similar in type and nature to the violations listed above, has continued from at least 1965. Such violations are known to the Owners and may be included in future legal actions by Citizens. Such discharges may only be known to Owners and eyewitnesses to be determined since such discharges may not have been reported by Owners as required by law.

Citizens intend, at the close of the sixty (60) day notice period, or sooner pursuant to violations of 33 U.S.C. §1316, to file a citizen suit under Section 505 of the CWA against Owners seeking statutory maximum civil penalties (calculated at \$37,500 per day for each day of violation from each of the 12 facility sources since January 2008). In addition, Citizens intend to seek civil penalties for additional violations from the same or different Facility sources that Citizens discover in the course of this litigation as well as those occurring subsequent to this letter. In addition, Citizens intend to seek injunctive and remedial relief, costs, attorney and expert witness fees, and such additional relief as the court determines is appropriate.

#### **IV. OWNERS ARE OPERATING AN OPEN DUMP IN VIOLATION OF RCRA STANDARDS FOR OPEN DUMPING**

Owners are operating an open dump prohibited by RCRA and its implementing regulations at its Reid Gardner landfill. RCRA forbids “open dumping” and the operation or establishment of an “open dump.” 42 U.S.C. § 6945(a). Where there is a “reasonable probability of adverse effects on health or the environment from disposal of solid waste” at a facility, that facility constitutes an open dump. 42 U.S.C. § 6945(a); 40 CFR § 257.1. The prohibition against open dumping is expressly enforceable under RCRA’s citizen suit provision. 42 U.S.C. § 6945(a). Violation of this prohibition may present an imminent and substantial endangerment under 42 U.S.C. § 6972(a)(1)(B), and is clearly a violation of a regulatory prohibition that “has become effective pursuant to this chapter” under 42 U.S.C. § 6972(a)(1)(A).

As required by statute, EPA has promulgated criteria, pursuant to RCRA § 6907(a)(3), defining solid waste management practices that constitute open dumping. *See* 42 U.S.C. § 6944(a); 40 C.F.R. Parts 257 and 258. Specifically, the regulations prohibit the contamination of any underground drinking water source beyond the solid waste boundary of a disposal site. *See* 40 C.F.R. § 257.3-4(a). Pollutants from the Reid Gardner Facility have contaminated the aquifer beneath it and moved off-site, based on groundwater flow mapping, the hydrological connection between the shallow aquifer and the Muddy River, and the nature of the constituents found in the water sampling.

The definition of “underground drinking water source” includes an aquifer supplying drinking water for human consumption or any aquifer in which the groundwater contains less

than 10,000 mg/L total dissolved solids. 40 C.F.R. § 257.3-4(c)(4). Monitoring well data upgradient of the landfill and wastewater ponds establish that background TDS levels in the region's shallow aquifer are generally far below 10,000 mg/L.

Groundwater monitoring data establishes contamination under the operative regulations. "Contaminate" means "to introduce a substance that would cause: (i) the concentration of that substance in the groundwater to exceed the maximum contaminant level specified in Appendix I, or (ii) an increase in the concentration of that substance in the groundwater where the existing concentration of that substance exceeds the maximum contaminant level specified in Appendix I." 40 C.F.R. § 257.3-4(c)(2). Appendix I to 40 C.F.R. Part 257 sets out numerous maximum contaminant levels (MCLs), including MCLs for arsenic, chromium, selenium and cadmium and other heavy metals that are typically found in CCW. Thus, the federal RCRA regulations define illegal open dumping as the disposal of solid waste that causes or contributes to the contamination of groundwater to levels that exceed a MCL set forth in Appendix I to 40 C.F.R. § 257.3-4(c)(2).

As explained previously, MCLs are also set out in the Safe Drinking Water Act (SDWA). Because the RCRA Open Dumping Regulations establish more stringent MCLs for chromium and selenium than the SDWA MCLs, as well as the state action levels for these constituents, exceedances of the SDWA and state action levels for these constituents also implicate the RCRA prohibition against open dumping. For instance, chromium, with a RCRA MCL of 0.05 mg/L, is consistently reported at or slightly above this level in one of the Facility's groundwater monitoring wells. Moreover, recent concentrations of selenium found in Reid Gardner groundwater monitoring wells were reported at 3.5 mg/L (70 times the state action level and 350 times the RCRA MCL). Groundwater monitoring data also indicate that recorded levels of arsenic consistently far surpass the RCRA standard of 0.05 mg/L. Indeed, concentrations as high as 0.54 mg/L have recently been recorded – several times the state action level and more than 10 times the RCRA MCL.

Citizens intend, at the close of the sixty (90) day statutory waiting period, to file a citizen suit under Section 7002 of RCRA, 42 U.S.C. § 6972, against Owners for their past or present violations of the open dumping prohibitions of 42 U.S.C. § 6945(a), and to seek thereby injunctive relief, statutory maximum civil penalties (calculated at \$37,500 for each violation, by day of violation, since January 2008), costs, attorney and expert witness fees, and such additional relief as the court determines is appropriate.

#### **IV. INFORMATION ABOUT THE PERSONS RESPONSIBLE FOR THE ALLEGED VIOLATIONS.**

The persons responsible for the violations alleged above are NV Energy, a corporation, the California Department of Water Resources, a state agency, and other owners and operators of the Reid Gardner Facility that may otherwise be known to NV Energy.

NV Energy's address is 6226 West Sahara Avenue, Las Vegas, Nevada 89146. NV Energy's telephone number is (702) 367-5555.

California Department of Water Resources' address is 1416 9th Street, Room 1115-1, Sacramento, CA 95814. California Department of Water Resources' telephone number is (916) 653-7007.

**V. ADDITIONAL INFORMATION**

Notifier Moapa Band of Paiute Indians' address is 1 Lincoln St., Moapa, NV 89025; its telephone number is (702) 865-2787. Notifier Sierra Club's address is 85 Second Street, 2nd Floor, San Francisco, California 94105-3441; its telephone number is (415) 977-5544 or (415) 977-5532. The Tribe and the Sierra Club request that any person receiving this notice direct all inquiries to the undersigned legal counsel.

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Sincerely,



Daniel M. Galpern, Lead Counsel  
Law Offices of Charles M. Tebbutt

ALSO SENT BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED, TO:

Lisa Jackson, Administrator  
United State Environmental Protection Agency  
USEPA Ariel Rios Building (AR)  
1200 Pennsylvania Avenue N.W.  
Washington, DC 20004

Jared Blumenfeld, Regional Administrator  
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75 Hawthorne Street  
Mail Code: ORA-1  
San Francisco, CA 94105

Colleen Cripps  
Nevada Division of Environmental Protection  
901 So. Stewart Street, Ste. 4001  
Carson City, NV 89701

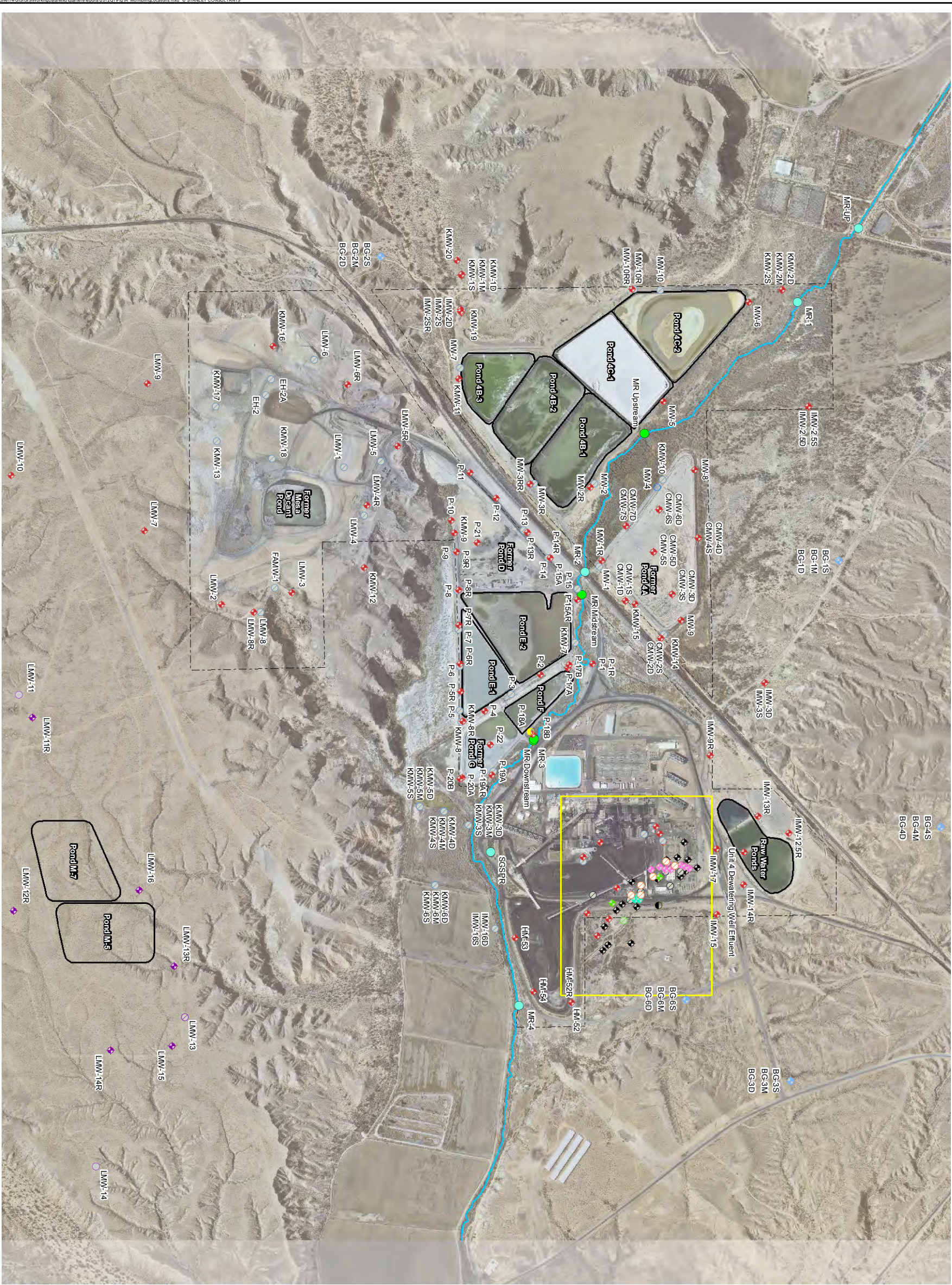
ALSO SENT BY US MAIL TO:

Gregg P. Barnard, Registered Agent for NV Energy  
6100 Neil Road Ste. 500  
Reno, NV 89511-1149

Tom Woodworth, Assistant General Counsel  
NV Energy  
6226 West Sahara Avenue  
Las Vegas, Nevada 89146

**ATTACHMENT A (cont.)**  
**Appendix to Notice of Intent to Sue**





REV	No.	REVISION DESCRIPTION	DATE	DRWN	CHKD	APVD
0		Submittal to NDEP	5/1/12	CC	AE	RLS

20618.06	REV.	0
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**Legend**

- Property Boundary
- Muddy River
- Pond Outline
- Figure 1B Map Area
- GMR Monitoring Locations**
  - Sampled or Gauged
  - Damaged
  - Dry
  - Abandoned / Destroyed
- Surface Water Monitoring Locations**
  - Surface Water Sampling
  - Surface Water Elevation
- Background Wells**
  - Sampled or Gauged
  - Damaged
  - Dry
  - Abandoned / Destroyed
- Mesa Pond Wells**
  - Sampled or Gauged
  - Damaged
  - Dry
  - Abandoned / Destroyed
  - Existing - Not Sampled
- Former Remediation Trench**
  - Abandoned / Destroyed
- Passive Recovery**
  - Sampled or Gauged
  - Damaged
  - Dry
  - Abandoned / Destroyed
- Vapor Extraction**
  - Sampled or Gauged
  - Damaged
  - Dry
  - Abandoned / Destroyed
- Dewatering**
  - Sampled or Gauged
  - Damaged
  - Dry
  - Abandoned / Destroyed
- Free Product Gauging**
  - Sampled or Gauged
  - Damaged
  - Dry
  - Abandoned / Destroyed

**Notes:**

1. Primary aerial from January 2, 2009 and updated September, 2010
2. Secondary aerial imagery provided by USDA-FSA Aerial Photography Field Office, published 2/22/2011, photographs taken late Spring 2010
3. Sampling locations current as of 1st Quarter 2012
4. MR Downstream gauging location is either the lower or upper culvert
5. Information for wells located within the yellow inset is available on Figure 1B
6. This figure shows all monitoring locations at Reid Gardner Station, not just those monitored this period

May 2012

**MONITORING LOCATIONS**  
2012 GMR

AOC Implementation  
NV Energy  
Reid Gardner Station  
Moapa, NV  
Figure 1A



## EXHIBIT I TO NOTICE OF INTENT TO SUE

### A Partial Listing of Exceedances of State Action Levels for Select Contaminants of Concern at Reid Gardner: 2008-2012

#### Explanatory Note to Exhibit I

Table 2, in the body of this notice letter, identifies exceedances of state-set action levels for 11 different chemicals identified by the Nevada Division of Environmental Protection (NDEP) as contaminants of concern requiring special attention for remediation of groundwater pollution at the Reid Gardner facility.

State action levels are less stringent than the federal MCL under RCRA for arsenic, chromium, and selenium. Accordingly, *all* exceedances of state action levels for these contaminants also exceed the RCRA MCL standards. Further, the state action levels for arsenic, chromium, and selenium are less stringent or equal to the federal SDWA primary MCLs for these contaminants, and the state action levels for manganese, chloride, sulfate, and TDS are less stringent than the federal SDWA secondary MCLs for these contaminants. Accordingly, again, *all* exceedances of state action levels for these contaminants also exceed the associated federal SDWA primary and secondary MCLs for these contaminants.

For the period 2008 through the first quarter of 2011, the numbers reported in Table 2 in the text of the notice letter are based on NV Energy's own summary information that it provided in quarterly monitoring reports to NDEP. After the 1<sup>st</sup> quart 2011 report, NV Energy ceased providing these summaries. Accordingly, entries for numbers from the 2<sup>nd</sup> quarter of 2011 through 2012 are for exceedances counted by the Tribe and the Club from NV Energy's raw monitoring data.

Below is a listing of a number of exceedances of state action levels for the same 11 contaminants of concern for the 2008-2012 period. The listing is for exceedances detected in all wells for the period beginning with the 2<sup>nd</sup> quarter of 2011 to the present (the period for which the Tribe and Club counted exceedances). For the period 2008 through the 1<sup>st</sup> quarter of 2011, this appendix also lists exceedances of state action levels for these contaminants in wells identified as "Units 1, 2, & 3" wells – namely, those measuring contamination from leaking ponds that receive wastewater from those electricity generating units and their processes. These wells, in particular, consistently report levels of contamination that greatly surpass the state action levels.

**ARSENIC**

<b>State Action Level:</b>	<b>0.16 mg/L</b>		
<b>RCRA MCL:</b>	<b>0.05 mg/L</b>	CMW-2S	
<b>SDWA Primary MCL:</b>	<b>0.01 mg/L</b>	2012Q3	0.31 mg/L
		2012Q1	0.51 mg/L
KMW-1S		2011Q4	0.44 mg/L
2012Q1	0.20 mg/L	2011Q3	0.38 mg/L
2011Q4	0.17 mg/L		
2011Q3	0.62 mg/L	CMW-3S	
		2012Q1	0.24 mg/L
MW-2R		2011Q4	0.22 mg/L
2012Q3	0.54 mg/L	2011Q3	0.2 mg/L
2012Q1	0.47 mg/L		
2011Q4	0.52 mg/L	CMW-5S	
2011Q3	0.56 mg/L	2012Q3	0.84 mg/L
2011Q2	0.335 mg/L	2012Q1	1.6 mg/L
		2011Q4	1.6 mg/L
MW-3RR		2011Q3	0.42 mg/L
2012Q1	0.17 mg/L		
2011Q4	0.23 mg/L	CMW-6S	
2011Q3	0.22 mg/L	2012Q1	0.20 mg/L
		2011Q4	0.20 mg/L
MW-5			
2012Q3	0.21 mg/L	CMW-7D	
2012Q1	0.23 mg/L	2012Q3	0.27 mg/L
2011Q4	0.25 mg/L	2012Q1	0.29 mg/L
2011Q3	0.2 mg/L	2011Q4	0.18 mg/L
2011Q2	0.206 mg/L		
		CMW-7S	
MW-6		2012Q3	1.1 mg/L
2012Q3	0.23 mg/L	2012Q1	0.97 mg/L
2012Q1	0.26 mg/L	2011Q4	0.59 mg/L
2011Q4	0.28 mg/L	2011Q3	0.23 mg/L
2011Q3	0.24 mg/L		
2011Q2	0.243 mg/L	KMW-15	
		2012Q3	0.30 mg/L
CMW-1S		2012Q1	0.55 mg/L
2011Q4	0.20 mg/L	2011Q4	0.70 mg/L
2011Q3	0.39 mg/L	2011Q3	0.22 mg/L
		2011Q2	0.623 mg/L
CMW-2D			
2012Q3	0.22 mg/L	MW-1R	
2012Q1	0.37 mg/L	2012Q3	0.38 mg/L
2011Q4	0.51 mg/L	2012Q1	0.33 mg/L
2011Q3	0.16 mg/L	2011Q4	0.40 mg/L

## MW-1R (continued)

2011Q3 0.52 mg/L  
2011Q2 0.323 mg/L

## P-2

2012Q3 0.81 mg/L  
2012Q1 0.55 mg/L  
2011Q4 0.62 mg/L  
2011Q3 0.69 mg/L  
2011Q2 0.398 mg/L  
2011Q1 0.425 mg/L  
2010Q4 0.353 mg/L  
2010Q3 1.1 mg/L  
2010Q2 0.23 mg/L  
2010Q1 0.36 mg/L  
2009Q4 0.31 mg/L  
2009Q3 0.16 mg/L  
2009Q2 0.44 mg/L  
2009Q1 0.58 mg/L  
2008Q4 0.5 mg/L  
2008Q3 0.38 mg/L  
2008Q2 0.31 mg/L  
2008Q1 0.31 mg/L

## P-4

2012Q3 0.29 mg/L  
2012Q1 0.34 mg/L  
2011Q4 0.32 mg/L  
2011Q3 0.28 mg/L  
2011Q2 0.354 mg/L  
2011Q1 0.352 mg/L  
2010Q4 0.176 mg/L  
2010Q3 0.217 mg/L  
2010Q1 0.44 mg/L  
2009Q2 0.26 mg/L  
2009Q1 0.43 mg/L  
2008Q4 0.31 mg/L

## P-5R

2012Q1 0.34 mg/L  
2011Q4 0.21 mg/L  
2011Q3 0.27 mg/L  
2011Q2 0.315 mg/L  
2011Q1 0.254 mg/L  
2010Q4 0.280 mg/L  
2010Q3 0.233 mg/L

## P-5R (continued)

2010Q1 0.29 mg/L  
2009Q4 0.18 mg/L  
2009Q2 0.37 mg/L  
2009Q1 0.49 mg/L  
2008Q4 0.42 mg/L  
2008Q3 0.24 mg/L  
2008Q2 0.24 mg/L  
2008Q1 0.25 mg/L

## P-6R

2012Q3 0.53 mg/L  
2012Q1 1.0 mg/L  
2011Q4 1.0 mg/L  
2011Q3 0.64 mg/L  
2011Q2 0.584 mg/L  
2011Q1 0.648 mg/L  
2010Q4 0.665 mg/L  
2010Q3 0.72 mg/L  
2010Q2 0.54 mg/L  
2010Q1 0.71 mg/L  
2009Q4 0.68 mg/L  
2009Q3 0.47 mg/L  
2009Q2 0.75 mg/L  
2009Q1 1.1 mg/L  
2008Q4 1 mg/L  
2008Q3 0.74 mg/L  
2008Q2 0.61 mg/L  
2008Q1 0.52 mg/L

## P-7R

2012Q1 0.87 mg/L  
2011Q4 1.2 mg/L  
2011Q3 0.80 mg/L  
2011Q2 0.505 mg/L  
2011Q1 0.818 mg/L  
2010Q4 0.949 mg/L  
2010Q3 0.838 mg/L  
2010Q2 0.32 mg/L  
2010Q1 0.73 mg/L  
2009Q4 0.79 mg/L  
2009Q3 0.6 mg/L  
2009Q2 1 mg/L  
2009Q1 0.98 mg/L  
2008Q4 1.1 mg/L  
2008Q3 0.75 mg/L

## P-7R (continued)

2008Q2 0.47 mg/L  
2008Q1 0.33 mg/L

## P-8R

2011Q4 0.47 mg/L  
2011Q4 0.43 mg/L  
2011Q3 0.42 mg/L  
2011Q1 0.266 mg/L  
2010Q4 0.257 mg/L  
2009Q3 0.27 mg/L  
2009Q2 0.39 mg/L  
2009Q1 0.68 mg/L  
2008Q4 0.59 mg/L  
2008Q3 0.34 mg/L  
2008Q2 0.21 mg/L  
2008Q1 0.22 mg/L

## P-9

2012Q3 0.47 mg/L  
2011Q4 0.41 mg/L  
2011Q3 0.42 mg/L

## P-9R

2011Q2 0.310 mg/L

## KMW-9

2008Q4 0.25 mg/L

## P-10

2012Q3 0.42 mg/L  
2012Q1 0.23 mg/L  
2011Q4 0.18 mg/L  
2011Q3 0.17 mg/L  
2011Q2 0.243 mg/L  
2010Q4 0.212 mg/L  
2009Q2 0.17 mg/L  
2009Q1 0.16 mg/L  
2008Q4 0.21 mg/L

## P-13R

2012Q3 0.16 mg/L  
2012Q1 0.32 mg/L  
2011Q4 0.35 mg/L  
2011Q3 0.24 mg/L  
2011Q2 0.258 mg/L

## P-13R (continued)

2011Q1 0.243 mg/L  
2010Q1 0.25 mg/L  
2009Q4 0.17 mg/L  
2009Q3 0.57 mg/L  
2009Q2 0.16 mg/L  
2009Q1 0.42 mg/L  
2008Q4 0.29 mg/L  
2008Q3 0.33 mg/L  
2008Q2 0.21 mg/L  
2008Q1 0.22 mg/L

## P-15AR

2012Q3 0.26 mg/L  
2012Q1 0.34 mg/L  
2011Q4 0.35 mg/L  
2011Q3 0.38 mg/L  
2011Q2 0.263 mg/L  
2011Q1 0.364 mg/L  
2009Q3 0.18 mg/L  
2009Q2 0.17 mg/L  
2008Q4 0.2 mg/L  
2008Q3 0.22 mg/L

## P-17A

2012Q3 0.61 mg/L  
2012Q1 0.62 mg/L  
2011Q4 0.67 mg/L  
2011Q3 0.60 mg/L  
2011Q2 0.565 mg/L  
2011Q1 0.545 mg/L  
2010Q4 0.682 mg/L  
2010Q3 0.747 mg/L  
2010Q1 0.34 mg/L  
2009Q3 0.27 mg/L  
2009Q2 0.3 mg/L  
2009Q1 0.79 mg/L  
2008Q4 0.44 mg/L  
2008Q3 0.38 mg/L  
2008Q2 0.33 mg/L  
2008Q1 0.33 mg/L

## P-17B

2012Q3 0.17 mg/L  
2012Q1 0.22 mg/L  
2011Q4 0.22 mg/L

P-17B *(continued)*

2011Q3	0.17 mg/L
2011Q2	0.405 mg/L
2011Q1	0.176 mg/L
2009Q4	0.46 mg/L
2009Q1	0.52 mg/L
2008Q4	0.5 mg/L
2008Q3	0.18 mg/L
2008Q1	0.35 mg/L

## P-20B

2011Q4	0.50 mg/L
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## P-21

2011Q4	0.26 mg/L
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## IMW-16S

2012Q3	0.28 mg/L
2012Q1	0.28 mg/L
2011Q4	0.27 mg/L
2011Q3	0.29 mg/L
2011Q2	0.268 mg/L

## HM-32R

2012Q3	0.20 mg/L
2012Q1	0.84 mg/L
2011Q4	0.85 mg/L
2011Q3	0.73 mg/L

## HM-53

2012Q3	0.82 mg/L
2012Q1	1.4 mg/L
2011Q4	1.4 mg/L
2011Q3	1.2 mg/L
2011Q2	1.14 mg/L

**BORON****State Action Level: 1.4 mg/L****No Federal MCL**

LMW-2		LMW-9	
2012Q3	6.2 mg/L	2012Q3	1.7 mg/L
2012Q1	6.0 mg/L	2012Q1	2.2 mg/L
2011Q4	5.0 mg/L	2011Q4	2.0 mg/L
2011Q3	5.0 mg/L	2011Q3	2.0 mg/L
2011Q2	6.26 mg/L	2011Q2	2.02 mg/L
LMW-3		KMW-12	
2012Q3	7.4 mg/L	2012Q3	5.0 mg/L
2012Q1	7.4 mg/L	2012Q1	5.1 mg/L
2011Q4	6.9 mg/L	2011Q4	4.6 mg/L
2011Q2	7.11 mg/L	2011Q3	4.1 mg/L
		2011Q2	5.1 mg/L
LMW-4R		KMW-1M	
2012Q3	7.4 mg/L	2012Q3	5.7 mg/L
2012Q1	7.4 mg/L	2012Q1	6.0 mg/L
2011Q4	7.2 mg/L	2011Q4	6.3 mg/L
2011Q3	7.2 mg/L	2011Q2	7.95 mg/L
LMW-5R		KMW-1S	
2012Q3	7.1 mg/L	2012Q3	58 mg/L
2012Q1	7.8 mg/L	2012Q1	60 mg/L
2011Q4	6.9 mg/L	2011Q4	57 mg/L
2011Q3	7.6 mg/L	2011Q3	35 mg/L
LMW-5		2011Q2	63 mg/L
2008Q4	5.2 mg/L	KMW-19	
2008Q3	5.2 mg/L	2012Q3	3.7 mg/L
2008Q2	5.3 mg/L	2012Q1	4.6 mg/L
2008Q1	6.0 mg/L	2011Q4	3.8 mg/L
LMW-6R		2011Q2	4.62 mg/L
2012Q3	7.3 mg/L	KMW-20	
2012Q1	9.2 mg/L	2012Q3	6.3 mg/L
2011Q4	7.5 mg/L	2012Q1	5.1 mg/L
2011Q3	7.5 mg/L	2011Q4	6.3 mg/L
LMW-8R		2011Q3	6.5 mg/L
2012Q3	4.1 mg/L	2011Q2	7.1 mg/L
2012Q1	4.4 mg/L	KMW-11	
2011Q4	3.8 mg/L	2012Q1	2.0 mg/L
2011Q3	3.8 mg/L		

KMW-11 ( <i>continued</i> )		CMW-2D ( <i>continued</i> )	
2011Q4	1.9 mg/L	2011Q3	10 mg/L
2011Q3	2.0 mg/L		
2011Q2	1.82 mg/L	CMW-2S	
		2012Q3	4.6 mg/L
MW10-RR		2012Q1	6.4 mg/L
2012Q3	6.2 mg/L	2011Q4	5.5 mg/L
2012Q1	6.2 mg/L	2011Q3	5 mg/L
2011Q4	5.1 mg/L		
2011Q3	6.1 mg/L	CMW-3D	
		2012Q3	2.8 mg/L
MW-2R		2012Q1	2.9 mg/L
2012Q3	3.9 mg/L	2011Q4	3.2 mg/L
2012Q1	4.7 mg/L	2011Q3	3.8 mg/L
2011Q4	3.9 mg/L		
2011Q3	4.3 mg/L	CMW-3S	
		2012Q3	56 mg/L
MW-3RR		2012Q1	73 mg/L
2012Q3	25 mg/L	2011Q4	81 mg/L
2012Q1	28 mg/L	2011Q3	85 mg/L
2011Q4	26 mg/L		
2011Q3	26 mg/L	CMW-5D	
		2012Q3	9.0 mg/L
MW-5		2012Q1	9.6 mg/L
2012Q3	2.3 mg/L	2011Q4	5.4 mg/L
2012Q1	3.1 mg/L	2011Q3	6.2 mg/L
2011Q4	2.6 mg/L		
2011Q3	2.4 mg/L	CMW-5S	
2011Q2	3.12 mg/L	2012Q3	33 mg/L
		2012Q1	36 mg/L
CMW-1D		2011Q4	26 mg/L
2012Q3	2.2 mg/L	2011Q3	41 mg/L
2012Q1	2.4 mg/L		
2011Q4	2.6 mg/L	CMW-6D	
2011Q3	2.2 mg/L	2012Q3	2.8 mg/L
		2011Q3	12 mg/L
CMW-1S			
2012Q3	2.2 mg/L	CMW-6S	
2012Q1	2.3 mg/L	2012Q3	14 mg/L
2011Q4	2.5 mg/L	2012Q1	18 mg/L
2011Q3	2.7 mg/L	2011Q4	19 mg/L
		2011Q3	19 mg/L
CMW-2D			
2012Q3	9.3 mg/L	CMW-7D	
2012Q1	10 mg/L	2012Q3	6.5 mg/L
2011Q4	8.9 mg/L	2012Q1	7.7 mg/L

## CMW-7D (continued)

2011Q4 5.6 mg/L  
2011Q3 2.7 mg/L

## CMW-7S

2012Q3 4.4 mg/L  
2012Q1 4.7 mg/L  
2011Q4 4.4 mg/L  
2011Q3 6.2 mg/L

## KMW-15

2012Q3 25 mg/L  
2012Q1 33 mg/L  
2011Q4 42 mg/L  
2011Q3 53 mg/L  
2011Q2 36.5 mg/L

## MW-1R

2012Q3 1.5 mg/L  
2012Q1 1.5 mg/L  
2011Q4 1.6 mg/L  
2011Q2 1.48 mg/L

## MW-4

2012Q3 3.8 mg/L  
2012Q1 3.9 mg/L  
2011Q4 2.1 mg/L  
2011Q3 4.3 mg/L  
2011Q2 4.84 mg/L

## MW-8

2012Q3 2.6 mg/L  
2012Q1 2.5 mg/L  
2011Q4 2.1 mg/L  
2011Q3 2.2 mg/L  
2011Q2 2.25 mg/L

## MW-9

2012Q3 3.3 mg/L  
2012Q1 3.5 mg/L  
2011Q4 2.5 mg/L  
2011Q3 2.7 mg/L  
2011Q2 2.8 mg/L

## P-1R

2012Q3 2.1 mg/L

## P-1R (continued)

2012Q1 1.7 mg/L  
2011Q4 2.0 mg/L  
2011Q3 1.8 mg/L  
2011Q2 1.8 mg/L

## P-2

2012Q3 51 mg/L  
2012Q1 47 mg/L  
2011Q4 56 mg/L  
2011Q3 55 mg/L  
2011Q2 46.3 mg/L  
2011Q1 48.6 mg/L  
2010Q4 59.1 mg/L  
2010Q3 61 mg/L  
2010Q2 76 mg/L  
2010Q1 63 mg/L  
2009Q4 79 mg/L  
2009Q3 63 mg/L  
2009Q2 68 mg/L  
2009Q1 69 mg/L  
2008Q4 67 mg/L  
2008Q3 67 mg/L  
2008Q2 68 mg/L  
2008Q1 70 mg/L

## P-4

2012Q3 150 mg/L  
2012Q1 170 mg/L  
2011Q4 190 mg/L  
2011Q3 160 mg/L  
2011Q2 168 mg/L  
2011Q1 159 mg/L  
2010Q4 144 mg/L  
2010Q3 148 mg/L  
2010Q2 170 mg/L  
2010Q1 170 mg/L  
2009Q4 150 mg/L  
2009Q3 140 mg/L  
2009Q2 140 mg/L  
2009Q1 160 mg/L  
2008Q4 140 mg/L  
2008Q3 140 mg/L  
2008Q2 130 mg/L  
2008Q1 130 mg/L



## P-5R

2012Q3	34 mg/L
2012Q1	32 mg/L
2011Q4	38 mg/L
2011Q3	34 mg/L
2011Q2	35.3 mg/L
2011Q1	30.5 mg/L
2010Q4	41.1 mg/L
2010Q3	39 mg/L
2010Q2	49 mg/L
2010Q1	51 mg/L
2009Q4	45 mg/L
2009Q3	37 mg/L
2009Q2	42 mg/L
2009Q1	47 mg/L
2008Q4	42 mg/L
2008Q3	42 mg/L
2008Q2	45 mg/L
2008Q1	45 mg/L

## P-6R

2012Q3	240 mg/L
2012Q1	270 mg/L
2011Q4	270 mg/L
2011Q3	250 mg/L
2011Q2	190 mg/L
2011Q1	206 mg/L
2010Q4	272 mg/L
2010Q3	291 mg/L
2010Q2	240 mg/L
2010Q1	280 mg/L
2009Q4	320 mg/L
2009Q3	290 mg/L
2009Q2	220 mg/L
2009Q1	250 mg/L
2008Q4	270 mg/L
2008Q3	270 mg/L
2008Q2	220 mg/L
2008Q1	200 mg/L

## P-7R

2012Q3	460 mg/L
2012Q1	640 mg/L
2011Q4	710 mg/L
2011Q3	620 mg/L
2011Q2	338 mg/L

## P-7R (continued)

2011Q1	495 mg/L
2010Q4	566 mg/L
2010Q3	516 mg/L
2010Q2	440 mg/L
2010Q1	470 mg/L
2009Q4	500 mg/L
2009Q3	290 mg/L
2009Q2	490 mg/L
2009Q1	420 mg/L
2008Q4	440 mg/L
2008Q3	430 mg/L
2008Q2	290 mg/L
2008Q1	220 mg/L

## P-8R

2012Q3	660 mg/L
2011Q4	650 mg/L
2011Q4	800 mg/L
2011Q3	820 mg/L
2011Q2	16.9 mg/L
2011Q1	632 mg/L
2010Q4	624 mg/L
2010Q3	580 mg/L
2010Q2	290 mg/L
2010Q1	750 mg/L
2009Q4	660 mg/L
2009Q3	320 mg/L
2009Q2	480 mg/L
2009Q1	750 mg/L
2008Q4	690 mg/L
2008Q3	290 mg/L
2008Q2	470 mg/L
2008Q1	560 mg/L

## P-9

2012Q3	240 mg/L
2011Q4	270 mg/L
2011Q3	260 mg/L

## P-9R

2012Q3	19 mg/L
2012Q1	19 mg/L
2011Q4	21 mg/L
2011Q3	21 mg/L
2011Q2	680 mg/L

## P-9R (continued)

2011Q1	20.5 mg/L
2010Q4	19.7 mg/L
2010Q3	19 mg/L
2010Q2	20 mg/L
2010Q1	28 mg/L
2009Q4	20 mg/L
2009Q3	18 mg/L
2009Q2	19 mg/L
2009Q1	21 mg/L
2008Q4	20 mg/L
2008Q3	19 mg/L
2008Q2	19 mg/L
2008Q1	18 mg/L

## KMW-9

2012Q3	140 mg/L
2012Q1	160 mg/L
2011Q4	160 mg/L
2011Q3	150 mg/L
2011Q2	155 mg/L
2011Q1	108 mg/L
2010Q4	173 mg/L
2010Q3	220 mg/L
2010Q2	170 mg/L
2010Q1	180 mg/L
2009Q4	170 mg/L
2009Q3	170 mg/L
2009Q2	170 mg/L
2009Q1	180 mg/L
2008Q4	75 mg/L
2008Q3	170 mg/L
2008Q2	170 mg/L
2008Q1	170 mg/L

## P-10

2012Q3	52 mg/L
2012Q1	57 mg/L
2011Q4	58 mg/L
2011Q3	57 mg/L
2011Q2	70.1 mg/L
2011Q1	67.0 mg/L
2010Q4	60.6 mg/L
2010Q3	78 mg/L
2010Q2	74 mg/L
2010Q1	82 mg/L

## P-10 (continued)

2009Q4	69 mg/L
2009Q3	84 mg/L
2009Q2	72 mg/L
2009Q1	80 mg/L
2008Q4	170 mg/L
2008Q3	68 mg/L
2008Q2	72 mg/L
2008Q1	74 mg/L

## P-11

2012Q3	8.9 mg/L
2012Q1	6.0 mg/L
2011Q4	6.0 mg/L
2011Q3	4.8 mg/L
2011Q2	5.29 mg/L
2011Q1	5.55 mg/L
2010Q4	5.71 mg/L
2010Q3	5.32 mg/L
2010Q2	5.8 mg/L
2010Q1	5.4 mg/L
2009Q4	5.5 mg/L
2009Q3	5.8 mg/L
2009Q2	6 mg/L
2009Q1	6.2 mg/L
2008Q4	5.9 mg/L
2008Q3	6.0 mg/L
2008Q2	5.9 mg/L
2008Q1	6.5 mg/L

## P-12

2012Q3	5.1 mg/L
2012Q1	5.2 mg/L
2011Q4	4.6 mg/L
2011Q2	5.07 mg/L
2011Q1	4.87 mg/L
2010Q4	5.20 mg/L
2010Q3	4.76 mg/L
2010Q2	4.8 mg/L
2010Q1	5 mg/L
2009Q4	4.9 mg/L
2009Q3	4.9 mg/L
2009Q2	5.4 mg/L
2009Q1	5.5 mg/L
2008Q4	5 mg/L
2008Q3	5.3 mg/L

## P-12 (continued)

2008Q2 5.3 mg/L  
2008Q1 5.5 mg/L

## P-13R

2012Q3 87 mg/L  
2012Q1 69 mg/L  
2011Q4 66 mg/L  
2011Q3 83 mg/L  
2011Q2 70.6 mg/L  
2011Q1 63.9 mg/L  
2010Q4 85.6 mg/L  
2010Q3 81 mg/L  
2010Q2 70 mg/L  
2010Q1 61 mg/L  
2009Q4 72 mg/L  
2009Q3 80 mg/L  
2009Q2 64 mg/L  
2009Q1 64 mg/L  
2008Q4 64 mg/L  
2008Q3 69 mg/L  
2008Q2 40 mg/L  
2008Q1 47 mg/L

## P-14R

2012Q3 120 mg/L  
2012Q1 130 mg/L  
2011Q4 110 mg/L  
2011Q3 130 mg/L  
2011Q2 123 mg/L  
2011Q1 115 mg/L  
2010Q4 119 mg/L  
2010Q3 117 mg/L  
2010Q2 110 mg/L  
2010Q1 120 mg/L  
2009Q4 120 mg/L  
2009Q3 110 mg/L  
2009Q2 110 mg/L  
2009Q1 110 mg/L  
2008Q4 92 mg/L  
2008Q3 110 mg/L  
2008Q2 110 mg/L  
2008Q1 100 mg/L

## P-15AR

2012Q3 16 mg/L

## P-15AR (continued)

2012Q1 16 mg/L  
2011Q4 17 mg/L  
2011Q3 17 mg/L  
2011Q2 16.7 mg/L  
2011Q1 16.4 mg/L  
2010Q4 13.3 mg/L  
2010Q3 14 mg/L  
2010Q2 16 mg/L  
2010Q1 16 mg/L  
2009Q4 16 mg/L  
2009Q3 14 mg/L  
2009Q2 19 mg/L  
2009Q1 19 mg/L  
2008Q4 21 mg/L  
2008Q3 26 mg/L  
2008Q2 25 mg/L  
2008Q1 27 mg/L

## P-17A

2012Q3 59 mg/L  
2012Q1 54 mg/L  
2011Q4 59 mg/L  
2011Q3 54 mg/L  
2011Q2 51.2 mg/L  
2011Q1 50.2 mg/L  
2010Q4 57.7 mg/L  
2010Q3 56 mg/L  
2010Q2 41 mg/L  
2010Q1 41 mg/L  
2009Q4 46 mg/L  
2009Q3 42 mg/L  
2009Q2 42 mg/L  
2009Q1 47 mg/L  
2008Q4 48 mg/L  
2008Q3 40 mg/L  
2008Q2 42 mg/L  
2008Q1 39 mg/L

## P-17B

2012Q3 110 mg/L  
2012Q1 120 mg/L  
2011Q4 120 mg/L  
2011Q3 110 mg/L  
2011Q2 112 mg/L  
2011Q1 115 mg/L

P-17B (continued)		P-21	
2010Q4	127 mg/L	2012Q3	11 mg/L
2010Q3	121 mg/L	2012Q1	5.6 mg/L
2010Q2	110 mg/L	2011Q4	6.6 mg/L
2010Q1	120 mg/L	2011Q3	6.4 mg/L
2009Q4	110 mg/L	P-22	
2009Q3	130 mg/L	2012Q3	13 mg/L
2009Q2	120 mg/L	2012Q1	10 mg/L
2009Q1	130 mg/L	2011Q4	9.9 mg/L
2008Q4	130 mg/L	2011Q3	5.4 mg/L
2008Q3	110 mg/L	IMW-16S	
2008Q2	120 mg/L	2012Q3	2.4 mg/L
2008Q1	130 mg/L	2012Q1	2.7 mg/L
P-18B		2011Q4	2.5 mg/L
2012Q3	8.3 mg/L	2011Q3	2.2 mg/L
2012Q1	5.7 mg/L	2011Q2	2.8 mg/L
2011Q4	7.3 mg/L	IMW-13R	
2011Q3	4.9 mg/L	2012Q1	2.7 mg/L
2011Q2	6.3 mg/L	2011Q4	3.7 mg/L
P-19AR		2011Q3	7.3 mg/L
2012Q3	3.6 mg/L	2011Q2	6.67 mg/L
2012Q1	3.6 mg/L	IMW-14R	
2011Q4	3.3 mg/L	2012Q3	3.7 mg/L
2011Q3	2.7 mg/L	2012Q1	4.4 mg/L
P-20A		2011Q4	4.3 mg/L
2012Q3	9.5 mg/L	2011Q3	3.5 mg/L
2012Q1	7.0 mg/L	2011Q2	4.11 mg/L
2011Q4	12 mg/L	IMW-15	
2011Q3	7.2 mg/L	2012Q1	5.2 mg/L
2011Q2	31.6 mg/L	2011Q4	4.7 mg/L
P-20B		2011Q3	4.1 mg/L
2012Q3	2.0 mg/L	2011Q2	5.41 mg/L
2012Q1	2.6 mg/L	IMW-17R	
2011Q4	2.2 mg/L	2012Q3	3.9 mg/L
2011Q3	2.0 mg/L	2012Q1	3.3 mg/L
2011Q2	2.35 mg/L	2011Q4	3.6 mg/L
KMW-8R		2011Q3	3.5 mg/L
2012Q3	57 mg/L	2011Q2	2.84 mg/L
2012Q1	53 mg/L		
2011Q4	59 mg/L		
2011Q2	51.2 mg/L		

HM-8		HM-33	
2012Q3	4.3 mg/L	2012Q3	2.0 mg/L
2012Q1	4.7 mg/L	2011Q4	2.2 mg/L
2011Q4	4.5 mg/L	2011Q3	2.1 mg/L
2011Q3	4.7 mg/L	2011Q2	2.14 mg/L
2011Q2	5.43 mg/L		
		HM-52R	
HM-48		2012Q3	3.0 mg/L
2012Q1	2.7 mg/L	2012Q1	3.8 mg/L
2011Q4	2.0 mg/L	2011Q4	3.6 mg/L
2011Q3	2.1 mg/L	2011Q3	3.2 mg/L
2011Q2	3.18 mg/L		
		HM-53	
HM-19		2012Q3	6.0 mg/L
2012Q3	3.0 mg/L	2012Q1	9.0 mg/L
2012Q1	3.7 mg/L	2011Q4	6.8 mg/L
2011Q4	3.3 mg/L	2011Q3	5.9 mg/L
2011Q3	3.3 mg/L	2011Q2	8 mg/L
2011Q2	3.46 mg/L		
		HM-54	
HM-24		2012Q3	15 mg/L
2012Q3	3.4 mg/L	2012Q1	16 mg/L
2012Q1	4.0 mg/L	2011Q4	14 mg/L
2011Q4	3.5 mg/L	2011Q3	14 mg/L
2011Q3	3.8 mg/L	2011Q2	13.9 mg/L
2011Q2	3.92 mg/L		
		HM-60	
HM-28		2012Q3	2.2 mg/L
2012Q3	2.4 mg/L		
2012Q1	3.3 mg/L		
2011Q4	3.0 mg/L		
2011Q3	2.7 mg/L		
2011Q2	2.94 mg/L		
HM-31R			
2012Q3	3.6 mg/L		
2012Q1	3.1 mg/L		
2011Q4	2.5 mg/L		
2011Q3	2.6 mg/L		
2011Q2	3.06 mg/L		
HM-32R			
2012Q3	4.3 mg/L		
2012Q1	9.9 mg/L		
2011Q4	2.5 mg/L		
2011Q3	9.4 mg/L		

**CHLORIDE****State Action Level: 520 mg/L****SDWA Secondary MCL: 250 mg/L**

LMW-2		KMW-1M	
2012Q1	540 mg/L	2012Q3	560 mg/L
2011Q4	600 mg/L	2012Q1	780 mg/L
2011Q3	530 mg/L	2011Q4	680 mg/L
2011Q2	524 mg/L	2011Q2	650 mg/L
LMW-3		KMW-1S	
2012Q3	570 mg/L	2012Q3	3500 mg/L
2012Q1	640 mg/L	2012Q1	2800 mg/L
2011Q4	640 mg/L	2011Q4	3000 mg/L
2011Q2	614 mg/L	2011Q3	2900 mg/L
		2011Q2	3250 mg/L
LMW-4R		MW10-RR	
2012Q1	550 mg/L	2012Q3	2200 mg/L
2011Q4	590 mg/L	2012Q1	2500 mg/L
2011Q3	550 mg/L	2011Q4	2800 mg/L
		2011Q3	2500 mg/L
LMW-5R		MW-2R	
2012Q1	560 mg/L	2012Q3	1800 mg/L
2011Q4	540 mg/L	2012Q1	2000 mg/L
2011Q3	540 mg/L	2011Q4	2300 mg/L
		2011Q3	2000 mg/L
LMW-5		2011Q2	7040 mg/L
2008Q3	350 mg/L		
LMW-6R		MW-3RR	
2012Q3	580 mg/L	2012Q3	2900 mg/L
2012Q1	690 mg/L	2012Q1	3700 mg/L
2011Q4	1400 mg/L	2011Q4	3700 mg/L
2011Q3	690 mg/L	2011Q3	3700 mg/L
LMW-8R		MW-5	
2012Q3	810 mg/L	2012Q3	940 mg/L
2012Q1	930 mg/L	2012Q1	1200 mg/L
2011Q4	920 mg/L	2011Q4	1200 mg/L
2011Q3	920 mg/L	2011Q3	880 mg/L
		2011Q2	1010 mg/L
KMW-1D		CMW-1D	
2011Q4	680 mg/L	2012Q1	560 mg/L
		2011Q3	640 mg/L

CMW-1S		CMW-6S	
2012Q1	580 mg/L	2012Q3	2600 mg/L
2011Q4	620 mg/L	2012Q1	3200 mg/L
2011Q3	590 mg/L	2011Q4	3300 mg/L
		2011Q3	3100 mg/L
CMW-2D		CMW-7S	
2012Q3	1400 mg/L	2012Q1	630 mg/L
2012Q1	1600 mg/L	2011Q4	660 mg/L
2011Q4	1100 mg/L	2011Q3	700 mg/L
CMW-2S		KMW-15	
2012Q3	1000 mg/L	2012Q3	2400 mg/L
2012Q1	1100 mg/L	2012Q1	3100 mg/L
2011Q4	610 mg/L	2011Q4	12,000 mg/L
2011Q3	1100 mg/L	2011Q3	2300 mg/L
CMW-3D		2011Q2	2940 mg/L
2012Q3	710 mg/L	MW-8	
2012Q1	810 mg/L	2012Q3	550 mg/L
2011Q4	820 mg/L	2012Q1	570 mg/L
2011Q3	840 mg/L	2011Q4	600 mg/L
CMW-3S		2011Q3	580 mg/L
2012Q3	1100 mg/L	2011Q2	527 mg/L
2012Q1	1300 mg/L	MW-9	
2011Q4	1400 mg/L	2012Q3	1200 mg/L
2011Q3	1300 mg/L	2012Q1	1400 mg/L
CMW-5D		2011Q4	1200 mg/L
2012Q3	1400 mg/L	2011Q3	1200 mg/L
2012Q1	1700 mg/L	2011Q2	1090 mg/L
2011Q4	1100 mg/L	P-2	
2011Q3	1000 mg/L	2012Q3	5300 mg/L
CMW-5S		2012Q1	6100 mg/L
2012Q3	8700 mg/L	2011Q4	6200 mg/L
2012Q1	9600 mg/L	2011Q3	5800 mg/L
2011Q4	10,000 mg/L	2011Q2	6660 mg/L
2011Q3	9500 mg/L	2011Q1	5320 mg/L
CMW-6D		2010Q4	5880 mg/L
2012Q3	2700 mg/L	2010Q3	5320 mg/L
2012Q1	3400 mg/L	2010Q2	5700 mg/L
2011Q4	3200 mg/L	2010Q1	5600 mg/L
2011Q3	3000 mg/L	2009Q4	5600 mg/L
		2009Q3	5700 mg/L

## P-2 (continued)

2009Q2	5700 mg/L
2009Q1	5500 mg/L
2008Q4	5700 mg/L
2008Q3	6200 mg/L
2008Q2	5600 mg/L
2008Q1	5700 mg/L

## P-4

2012Q3	4900 mg/L
2012Q1	6000 mg/L
2011Q4	5900 mg/L
2011Q3	5300 mg/L
2011Q2	6990 mg/L
2011Q1	5320 mg/L
2010Q4	5820 mg/L
2010Q3	5740 mg/L
2010Q2	6000 mg/L
2010Q1	5100 mg/L
2009Q4	6100 mg/L
2009Q3	6100 mg/L
2009Q2	6200 mg/L
2009Q1	5800 mg/L
2008Q4	6100 mg/L
2008Q3	6500 mg/L
2008Q2	6600 mg/L
2008Q1	6100 mg/L

## P-5R

2012Q3	6300 mg/L
2012Q1	7300 mg/L
2011Q4	7000 mg/L
2011Q3	6400 mg/L
2011Q2	7530 mg/L
2011Q1	6360 mg/L
2010Q4	6720 mg/L
2010Q3	6600 mg/L
2010Q2	7000 mg/L
2010Q1	7100 mg/L
2009Q4	6900 mg/L
2009Q3	6800 mg/L
2009Q2	7000 mg/L
2009Q1	6600 mg/L
2008Q4	7000 mg/L
2008Q3	7600 mg/L
2008Q2	6900 mg/L

## P-5R (continued)

2008Q1	7000 mg/L
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## P-6R

2012Q3	5500 mg/L
2012Q1	6300 mg/L
2011Q4	6300 mg/L
2011Q3	5000 mg/L
2011Q2	5070 mg/L
2011Q1	4820 mg/L
2010Q4	6730 mg/L
2010Q3	5160 mg/L
2010Q2	5100 mg/L
2010Q1	5200 mg/L
2009Q4	5400 mg/L
2009Q3	5300 mg/L
2009Q2	4800 mg/L
2009Q1	4900 mg/L
2008Q4	5200 mg/L
2008Q3	5300 mg/L
2008Q2	4900 mg/L
2008Q1	4600 mg/L

## P-7R

2012Q3	6400 mg/L
2012Q1	6600 mg/L
2011Q4	7600 mg/L
2011Q3	6700 mg/L
2011Q2	6160 mg/L
2011Q1	6070 mg/L
2010Q4	5560 mg/L
2010Q3	4930 mg/L
2010Q2	4700 mg/L
2010Q1	4200 mg/L
2009Q4	4300 mg/L
2009Q3	4700 mg/L
2009Q2	4700 mg/L
2009Q1	4000 mg/L
2008Q4	4100 mg/L
2008Q3	5200 mg/L
2008Q2	3100 mg/L
2008Q1	2700 mg/L

## P-8R

2012Q3	7500 mg/L
2011Q4	7000 mg/L



## P-8R (continued)

2011Q3	7900 mg/L
2011Q2	7470 mg/L
2011Q1	6620 mg/L
2010Q4	5850 mg/L
2010Q3	6080 mg/L
2010Q2	5100 mg/L
2010Q1	7000 mg/L
2009Q4	6200 mg/L
2009Q3	5200 mg/L
2009Q2	5200 mg/L
2009Q1	6700 mg/L
2008Q4	6600 mg/L
2008Q3	5300 mg/L
2008Q2	5200 mg/L
2008Q1	5600 mg/L

## P-9

2012Q3	4400 mg/L
2011Q4	4500 mg/L
2011Q3	4400 mg/L

## P-9R

2012Q3	1100 mg/L
2012Q1	1300 mg/L
2011Q3	1400 mg/L
2011Q2	1390 mg/L
2011Q1	1330 mg/L
2010Q4	1320 mg/L
2010Q3	1460 mg/L
2010Q2	1500 mg/L
2010Q1	1600 mg/L
2009Q4	1400 mg/L
2009Q3	1400 mg/L
2009Q2	1400 mg/L
2009Q1	1400 mg/L
2008Q4	1400 mg/L
2008Q3	1400 mg/L
2008Q2	1300 mg/L
2008Q1	1200 mg/L

## KMW-9

2012Q3	3700 mg/L
2012Q1	3800 mg/L
2011Q4	4800 mg/L
2011Q3	4000 mg/L

## KMW-9 (continued)

2011Q2	4500 mg/L
2011Q1	5060 mg/L
2010Q4	4110 mg/L
2010Q3	4020 mg/L
2010Q2	4100 mg/L
2010Q1	4000 mg/L
2009Q4	4000 mg/L
2009Q3	4100 mg/L
2009Q2	4100 mg/L
2009Q1	3900 mg/L
2008Q4	4100 mg/L
2008Q3	4200 mg/L
2008Q2	4000 mg/L
2008Q1	4000 mg/L

## P-10

2012Q3	3700 mg/L
2012Q1	3900 mg/L
2011Q4	3700 mg/L
2011Q3	3100 mg/L
2011Q2	5060 mg/L
2011Q1	4600 mg/L
2010Q4	3110 mg/L
2010Q3	4300 mg/L
2010Q2	4800 mg/L
2010Q1	5200 mg/L
2009Q4	3800 mg/L
2009Q3	4600 mg/L
2009Q2	4700 mg/L
2009Q1	4700 mg/L
2008Q4	4100 mg/L
2008Q3	3700 mg/L
2008Q2	4200 mg/L
2008Q1	4900 mg/L

## P-11

2012Q3	770 mg/L
2012Q1	530 mg/L
2011Q4	520 mg/L
2011Q1	525 mg/L
2009Q4	530 mg/L

## P-12R

2011Q1	535 mg/L
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P-13R  
 2012Q3 3100 mg/L  
 2012Q1 4500 mg/L  
 2011Q4 7200 mg/L  
 2011Q3 3200 mg/L  
 2011Q2 5040 mg/L  
 2011Q1 3890 mg/L  
 2010Q4 4420 mg/L  
 2010Q3 2770 mg/L  
 2010Q2 4200 mg/L  
 2010Q1 3800 mg/L  
 2009Q4 3600 mg/L  
 2009Q3 2700 mg/L  
 2009Q2 3600 mg/L  
 2009Q1 4000 mg/L  
 2008Q4 4500 mg/L  
 2008Q3 5100 mg/L  
 2008Q2 3300 mg/L  
 2008Q1 3100 mg/L

P-14R  
 2012Q3 3300 mg/L  
 2012Q1 3500 mg/L  
 2011Q4 4300 mg/L  
 2011Q3 3600 mg/L  
 2011Q2 3760 mg/L  
 2011Q1 3000 mg/L  
 2010Q4 2770 mg/L  
 2010Q3 3460 mg/L  
 2010Q2 3600 mg/L  
 2010Q1 3500 mg/L  
 2009Q4 3400 mg/L  
 2009Q3 3300 mg/L  
 2009Q2 3400 mg/L  
 2009Q1 3300 mg/L  
 2008Q4 3200 mg/L  
 2008Q3 3400 mg/L  
 2008Q2 3300 mg/L  
 2008Q1 3200 mg/L

P-15AR  
 2012Q3 600 mg/L  
 2012Q1 680 mg/L  
 2011Q4 690 mg/L  
 2011Q3 640 mg/L  
 2011Q2 704 mg/L

P-15AR (continued)  
 2011Q1 690 mg/L  
 2010Q4 554 mg/L  
 2010Q3 636 mg/L  
 2010Q2 690 mg/L  
 2010Q1 680 mg/L  
 2009Q4 650 mg/L  
 2009Q3 610 mg/L  
 2009Q2 790 mg/L  
 2009Q1 730 mg/L  
 2008Q4 820 mg/L  
 2008Q3 960 mg/L  
 2008Q2 860 mg/L  
 2008Q1 860 mg/L

P-17A  
 2012Q3 4200 mg/L  
 2012Q1 4900 mg/L  
 2011Q4 4500 mg/L  
 2011Q3 4700 mg/L  
 2011Q2 5530 mg/L  
 2011Q1 5400 mg/L  
 2010Q4 7210 mg/L  
 2010Q3 5590 mg/L  
 2010Q2 8000 mg/L  
 2010Q1 9200 mg/L  
 2009Q4 4300 mg/L  
 2009Q3 4900 mg/L  
 2009Q2 5000 mg/L  
 2009Q1 5200 mg/L  
 2008Q4 5400 mg/L  
 2008Q3 4600 mg/L  
 2008Q2 4900 mg/L  
 2008Q1 4700 mg/L

P-17B  
 2012Q3 4400 mg/L  
 2012Q1 4800 mg/L  
 2011Q4 4800 mg/L  
 2011Q3 4600 mg/L  
 2011Q2 4960 mg/L  
 2011Q1 4510 mg/L  
 2010Q4 5360 mg/L  
 2010Q3 4240 mg/L  
 2010Q2 4700 mg/L  
 2010Q1 4500 mg/L

P-17B ( <i>continued</i> )		IMW-16S	
2009Q4	4800 mg/L	2011Q4	520 mg/L
2009Q3	4400 mg/L		
2009Q2	4900 mg/L	IMW-9R	
2009Q1	4300 mg/L	2011Q4	590 mg/L
2008Q4	4400 mg/L		
2008Q3	4400 mg/L	IMW-14R	
2008Q2	4300 mg/L	2012Q3	710 mg/L
2008Q1	4100 mg/L	2011Q4	760 mg/L
		2011Q3	750 mg/L
P-18B			
2012Q3	980 mg/L	IMW-15	
2012Q1	1100 mg/L	2012Q1	1300 mg/L
2011Q4	1100 mg/L	2011Q4	1200 mg/L
2011Q3	1100 mg/L	2011Q3	1500 mg/L
2011Q2	1120 mg/L	2011Q2	1570 mg/L
P-19AR		HM-8	
2012Q3	630 mg/L	2011Q2	559 mg/L
2012Q1	650 mg/L		
2011Q4	660 mg/L	HM-28	
2011Q3	650 mg/L	2011Q4	700 mg/L
P-20A		HM-32R	
2011Q4	550 mg/L	2012Q1	880 mg/L
2011Q2	1110 mg/L	2011Q4	2800 mg/L
		2011Q3	840 mg/L
KMW-8R		HM-54	
2012Q3	2200 mg/L	2012Q3	780 mg/L
2012Q1	2400 mg/L	2012Q1	900 mg/L
2011Q4	2700 mg/L	2011Q4	850 mg/L
2011Q2	3080 mg/L	2011Q3	840 mg/L
		2011Q2	771 mg/L
P-21			
2012Q3	610 mg/L		
2012Q1	610 mg/L		
2011Q4	1300 mg/L		
2011Q3	650 mg/L		
P-22			
2012Q3	1200 mg/L		
2012Q1	1300 mg/L		
2011Q4	1300 mg/L		
2011Q3	1400 mg/L		

**CHROMIUM**

**State Action Level: 0.1 mg/L**

**SDWA Primary MCL: 0.1 mg/L**

**RCRA MCL: 0.05 mg/L**

LMW-9

2012Q1	0.11 mg/L
2011Q4	0.11 mg/L
2011Q2	0.101 mg/L
2011Q1	0.104 mg/L
2010Q4	0.106 mg/L
2010Q3	0.107 mg/L
2010Q2	0.11 mg/L
2010Q1	0.1 mg/L
2009Q4	0.11 mg/L
2009Q2	0.11 mg/L
2009Q1	0.1 mg/L
2008Q4	0.1 mg/L
2008Q3	0.11 mg/L
2008Q2	0.11 mg/L
2008Q1	0.11 mg/L

**MAGNESIUM****State Action Level: 165 mg/L****No Federal MCL**

LMW-2		KMW-19	
2012Q3	180 mg/L	2012Q3	440 mg/L
2012Q1	180 mg/L	2012Q1	540 mg/L
2011Q4	180 mg/L	2011Q4	430 mg/L
2011Q3	180 mg/L	2011Q2	472 mg/L
2011Q2	172 mg/L		
		KMW-20	
LMW-3		2012Q3	340 mg/L
2012Q1	220 mg/L	2012Q1	280 mg/L
2011Q4	210 mg/L	2011Q4	340 mg/L
2011Q2	203 mg/L	2011Q3	390 mg/L
		2011Q2	362 mg/L
LMW-5R			
2012Q3	190 mg/L	MW10-RR	
2012Q1	200 mg/L	2012Q3	660 mg/L
2011Q4	180 mg/L	2012Q1	730 mg/L
2011Q3	200 mg/L	2011Q4	670 mg/L
		2011Q3	750 mg/L
LMW-8R			
2012Q3	230 mg/L	MW-2R	
2012Q1	240 mg/L	2012Q3	410 mg/L
2011Q4	240 mg/L	2012Q1	470 mg/L
2011Q3	240 mg/L	2011Q4	380 mg/L
		2011Q3	460 mg/L
KMW-12		2011Q2	340 mg/L
2012Q1	170 mg/L		
2011Q3	170 mg/L	MW-3RR	
		2012Q3	1800 mg/L
KMW-1M		2012Q1	2800 mg/L
2012Q3	570 mg/L	2011Q4	2400 mg/L
2012Q1	560 mg/L	2011Q3	1800 mg/L
2011Q4	610 mg/L		
2011Q2	698 mg/L	MW-5	
		2012Q3	390 mg/L
KMW-1S		2012Q1	510 mg/L
2012Q3	1400 mg/L	2011Q4	450 mg/L
2012Q1	1600 mg/L	2011Q3	400 mg/L
2011Q4	1400 mg/L	2011Q2	461 mg/L
2011Q3	1500 mg/L		
2011Q2	1590 mg/L	CMW-1D	
		2012Q3	220 mg/L
		2012Q1	230 mg/L

CMW-1S		CMW-6S ( <i>continued</i> )	
2012Q3	210 mg/L	2011Q3	800 mg/L
2012Q1	210 mg/L		
2011Q4	210 mg/L	CMW-7D	
2011Q3	200 mg/L	2012Q3	200 mg/L
		2012Q1	260 mg/L
CMW-2D		2011Q4	220 mg/L
2012Q3	470 mg/L		
2012Q1	510 mg/L	CMW-7S	
2011Q4	300 mg/L	2012Q3	270 mg/L
2011Q3	290 mg/L	2012Q1	300 mg/L
		2011Q4	300 mg/L
CMW-2S		2011Q3	320 mg/L
2012Q3	280 mg/L		
2012Q1	240 mg/L	KMW-15	
2011Q4	240 mg/L	2012Q3	1200 mg/L
2011Q3	260 mg/L	2012Q1	1500 mg/L
		2011Q4	1700 mg/L
CMW-3D		2011Q3	1500 mg/L
2012Q3	310 mg/L	2011Q2	1610 mg/L
2012Q1	320mg/L		
2011Q4	300 mg/L	MW-4	
2011Q3	310 mg/L	2012Q1	180 mg/L
		2011Q3	180 mg/L
CMW-5D		2011Q2	193 mg/L
2012Q3	460 mg/L		
2012Q1	480 mg/L	MW-8	
2011Q4	340 mg/L	2012Q3	210 mg/L
2011Q3	350 mg/L	2012Q1	190 mg/L
		2011Q4	170 mg/L
CMW-5S		2011Q3	200 mg/L
2012Q3	2900 mg/L	2011Q2	190 mg/L
2012Q1	3000 mg/L		
2011Q4	3000 mg/L	MW-9	
2011Q3	3100 mg/L	2012Q3	600 mg/L
		2012Q1	720 mg/L
CMW-6D		2011Q4	580 mg/L
2012Q3	900 mg/L	2011Q3	590 mg/L
2012Q1	980 mg/L	2011Q2	493 mg/L
2011Q4	940 mg/L		
2011Q3	720 mg/L	P-1R	
		2012Q3	270 mg/L
CMW-6S		2012Q1	240 mg/L
2012Q3	610 mg/L	2011Q4	250 mg/L
2012Q1	750 mg/L	2011Q3	250 mg/L
2011Q4	780 mg/L	2011Q2	219 mg/L

## P-2

2012Q3	1800 mg/L
2012Q1	1800 mg/L
2011Q4	1900 mg/L
2011Q3	1800 mg/L
2011Q2	1790 mg/L
2011Q1	1730 mg/L
2010Q4	1850 mg/L
2010Q3	1820 mg/L
2010Q2	2000 mg/L
2010Q1	1800 mg/L
2009Q4	1900 mg/L
2009Q3	1800 mg/L
2009Q2	2000 mg/L
2009Q1	2000 mg/L
2008Q4	1800 mg/L
2008Q3	1900 mg/L
2008Q2	2100 mg/L
2008Q1	2000 mg/L

## P-4

2012Q3	1400 mg/L
2012Q1	1600 mg/L
2011Q4	1800 mg/L
2011Q3	1700 mg/L
2011Q2	1820 mg/L
2011Q1	1660 mg/L
2010Q4	1900 mg/L
2010Q3	1960 mg/L
2010Q2	2100 mg/L
2010Q1	1500 mg/L
2009Q4	2100 mg/L
2009Q3	2000 mg/L
2009Q2	2100 mg/L
2009Q1	2100 mg/L
2008Q4	2100 mg/L
2008Q3	2000 mg/L
2008Q2	2100 mg/L
2008Q1	2000 mg/L

## P-5R

2012Q3	1900 mg/L
2012Q1	2300 mg/L
2011Q4	2400 mg/L
2011Q3	2000 mg/L
2011Q2	2200 mg/L

## P-5R (continued)

2011Q1	2200 mg/L
2010Q4	2190 mg/L
2010Q3	2100 mg/L
2010Q2	2400 mg/L
2010Q1	2500 mg/L
2009Q4	2300 mg/L
2009Q3	2100 mg/L
2009Q2	2200 mg/L
2009Q1	2400 mg/L
2008Q4	2300 mg/L
2008Q3	2200 mg/L
2008Q2	2400 mg/L
2008Q1	2400 mg/L

## P-6R

2012Q3	2400 mg/L
2012Q1	2700 mg/L
2011Q4	2700 mg/L
2011Q3	2100 mg/L
2011Q2	2140 mg/L
2011Q1	2200 mg/L
2010Q4	2420 mg/L
2010Q3	2790 mg/L
2010Q2	2800 mg/L
2010Q1	2300 mg/L
2009Q4	2800 mg/L
2009Q3	2600 mg/L
2009Q2	2500 mg/L
2009Q1	2600 mg/L
2008Q4	2500 mg/L
2008Q3	2500 mg/L
2008Q2	2500 mg/L
2008Q1	2300 mg/L

## P-7R

2012Q3	1100 mg/L
2012Q1	1600 mg/L
2011Q4	1600 mg/L
2011Q3	1100 mg/L
2011Q2	1620 mg/L
2011Q1	1280 mg/L
2010Q4	1400 mg/L
2010Q3	1320 mg/L
2010Q2	1400 mg/L
2010Q1	970 mg/L



## P-7R (continued)

2009Q4	1100 mg/L
2009Q3	1100 mg/L
2009Q2	1200 mg/L
2009Q1	980 mg/L
2008Q4	980 mg/L
2008Q3	1000 mg/L
2008Q2	750 mg/L
2008Q1	680 mg/L

## P-8R

2012Q3	3400 mg/L
2011Q4	3700 mg/L
2011Q4	3300 mg/L
2011Q3	3300 mg/L
2011Q1	3350 mg/L
2010Q4	2800 mg/L
2010Q3	2760 mg/L
2010Q2	2200 mg/L
2010Q1	2900 mg/L
2009Q4	2900 mg/L
2009Q3	2000 mg/L
2009Q2	2600 mg/L
2009Q1	3200 mg/L
2008Q4	2900 mg/L
2008Q3	1900 mg/L
2008Q2	2300 mg/L
2008Q1	2600 mg/L

## P-9

2012Q3	1800 mg/L
2011Q4	2000 mg/L
2011Q3	1800 mg/L

## P-9R

2012Q3	300 mg/L
2012Q1	310 mg/L
2011Q4	310 mg/L
2011Q3	300 mg/L
2011Q2	3660 mg/L
2011Q1	313 mg/L
2010Q3	293 mg/L
2010Q1	300 mg/L
2009Q4	290 mg/L
2009Q2	280 mg/L
2009Q1	300 mg/L

## P-9R (continued)

2008Q4	270 mg/L
2008Q3	280 mg/L
2008Q2	270 mg/L
2008Q1	270 mg/L
KMW-9	
2012Q3	1400 mg/L
2012Q1	1800 mg/L
2011Q4	1600 mg/L
2011Q3	1500 mg/L
2011Q2	1500 mg/L
2011Q1	1430 mg/L
2010Q3	1240 mg/L
2010Q2	1700 mg/L
2010Q1	1400 mg/L
2009Q4	1500 mg/L
2009Q3	1500 mg/L
2009Q3	1500 mg/L
2009Q2	1600 mg/L
2009Q1	1500 mg/L
2008Q4	2000 mg/L
2008Q3	1500 mg/L
2008Q2	1500 mg/L
2008Q1	1500 mg/L

## P-10

2012Q3	1500 mg/L
2012Q1	1600 mg/L
2011Q4	1600 mg/L
2011Q3	1500 mg/L
2011Q2	1970 mg/L
2011Q1	2070 mg/L
2010Q4	1520 mg/L
2010Q3	2390 mg/L
2010Q2	2100 mg/L
2010Q1	2300 mg/L
2009Q4	1900 mg/L
2009Q3	2200 mg/L
2009Q2	1800 mg/L
2009Q1	2100 mg/L
2008Q4	1500 mg/L
2008Q3	1700 mg/L
2008Q2	1800 mg/L
2008Q1	1800 mg/L

## P-11

2012Q3	370 mg/L
2012Q1	200 mg/L
2011Q4	180 mg/L
2011Q3	200 mg/L
2011Q2	183 mg/L
2011Q1	171 mg/L
2010Q3	186 mg/L
2009Q4	170 mg/L
2009Q2	180 mg/L
2009Q1	180 mg/L
2008Q4	170 mg/L
2008Q3	170 mg/L
2008Q2	190 mg/L
2008Q1	180 mg/L

## P-12

2012Q3	200 mg/L
2012Q1	210 mg/L
2011Q4	180 mg/L
2011Q2	216 mg/L
2011Q1	202 mg/L
2010Q3	224 mg/L
2010Q1	210 mg/L
2009Q4	200 mg/L
2009Q2	210 mg/L
2009Q1	210 mg/L
2008Q4	210 mg/L
2008Q3	180 mg/L
2008Q2	220 mg/L
2008Q1	180 mg/L

## P-13R

2012Q3	1200 mg/L
2012Q1	2100 mg/L
2011Q4	1700 mg/L
2011Q3	1300 mg/L
2011Q2	1780 mg/L
2011Q1	1850 mg/L
2010Q4	1290 mg/L
2010Q3	974 mg/L
2010Q2	1800 mg/L
2010Q1	1600 mg/L
2009Q4	1400 mg/L
2009Q3	760 mg/L
2009Q2	1500 mg/L

## P-13R (continued)

2009Q1	1900 mg/L
2008Q4	1900 mg/L
2008Q3	2200 mg/L
2008Q2	1400 mg/L
2008Q1	1300 mg/L

## P-14R

2012Q3	300 mg/L
2012Q1	290 mg/L
2011Q4	230 mg/L
2011Q3	230 mg/L
2011Q2	190 mg/L
2010Q1	170 mg/L
2008Q1	180 mg/L

## P-15AR

2012Q3	280 mg/L
2012Q1	280 mg/L
2011Q4	290 mg/L
2011Q3	290 mg/L
2011Q2	285 mg/L
2011Q1	274 mg/L
2010Q3	236 mg/L
2010Q1	240 mg/L
2009Q4	240 mg/L
2009Q2	280 mg/L
2009Q1	250 mg/L
2008Q4	280 mg/L
2008Q3	320 mg/L
2008Q2	310 mg/L
2008Q1	280 mg/L

## P-17A

2012Q3	4100 mg/L
2012Q1	4200 mg/L
2011Q4	4400 mg/L
2011Q3	3800 mg/L
2011Q2	4380 mg/L
2011Q1	3940 mg/L
2010Q4	4230 mg/L
2010Q3	5270 mg/L
2010Q2	4700 mg/L
2010Q1	4600 mg/L
2009Q4	3900 mg/L
2009Q3	3500 mg/L

## P-17A (continued)

2009Q2	4100 mg/L
2009Q1	4500 mg/L
2008Q4	5100 mg/L
2008Q3	3900 mg/L
2008Q2	4100 mg/L
2008Q1	3600 mg/L

## P-17B

2012Q3	3400 mg/L
2012Q1	3900 mg/L
2011Q4	3800 mg/L
2011Q3	3200 mg/L
2011Q2	4070 mg/L
2011Q1	3580 mg/L
2010Q4	3880 mg/L
2010Q3	840 mg/L
2010Q2	3900 mg/L
2010Q1	3700 mg/L
2009Q4	3600 mg/L
2009Q3	3800 mg/L
2009Q2	4100 mg/L
2009Q1	4400 mg/L
2008Q4	4100 mg/L
2008Q3	3700 mg/L
2008Q2	4000 mg/L
2008Q1	4300 mg/L

## P-18B

2012Q3	460 mg/L
2012Q1	410 mg/L
2011Q4	450 mg/L
2011Q3	470 mg/L
2011Q2	393 mg/L

## P-19AR

2012Q3	380 mg/L
2012Q1	380 mg/L
2011Q4	360 mg/L
2011Q3	380 mg/L

## P-20A

2012Q3	190 mg/L
2012Q1	190 mg/L
2011Q4	190 mg/L
2011Q2	419 mg/L

## P-20B

2012Q3	230 mg/L
2012Q1	260 mg/L
2011Q4	210 mg/L
2011Q3	210 mg/L
2011Q2	209 mg/L

## KMW-8R

2012Q3	1100 mg/L
2012Q1	1100 mg/L
2011Q4	1200 mg/L
2011Q2	1140 mg/L

## P-21

2012Q3	240 mg/L
2011Q4	230 mg/L
2011Q3	240 mg/L

## P-22

2012Q3	510 mg/L
2012Q1	480 mg/L
2011Q4	460 mg/L
2011Q3	460 mg/L

## IMW-16S

2012Q3	240 mg/L
2012Q1	180 mg/L
2011Q4	170 mg/L
2011Q3	170 mg/L
2011Q2	167 mg/L

## IMW-2SR

2011Q3	180 mg/L
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## IMW-15

2012Q1	200 mg/L
2011Q4	170 mg/L
2011Q2	201 mg/L

## HM-53

2012Q3	210 mg/L
2012Q1	230 mg/L
2011Q4	180 mg/L
2011Q3	200 mg/L
2011Q2	199 mg/L

HM-54	
2012Q3	270 mg/L
2012Q1	290 mg/L
2011Q4	240 mg/L
2011Q3	250 mg/L
2011Q2	225 mg/L

**MANGANESE****State Action Level: 0.27 mg/L****SDWA Secondary MCL: 0.05 mg/L**

## IMW-2SR

2012Q3 0.38 mg/L  
 2012Q1 0.43 mg/L  
 2011Q4 0.61 mg/L  
 2011Q3 0.88 mg/L

## KMW-1M

2012Q3 1.5 mg/L  
 2012Q1 1.3 mg/L  
 2011Q4 1.7 mg/L  
 2011Q2 1.54 mg/L

## KMW-19

2012Q3 0.65 mg/L  
 2012Q1 0.81 mg/L  
 2011Q4 0.69 mg/L  
 2011Q2 0.757 mg/L

## KMW-20

2012Q3 0.75 mg/L  
 2012Q1 0.60 mg/L  
 2011Q4 0.72 mg/L  
 2011Q3 0.74 mg/L  
 2011Q2 0.973 mg/L

## KMW-1S

2011Q3 1.5 mg/L

## MW10-RR

2012Q3 3.0 mg/L  
 2012Q1 4.1 mg/L  
 2011Q4 3.8 mg/L  
 2011Q3 5.5 mg/L

## MW-2R

2012Q3 0.33 mg/L  
 2012Q1 0.38 mg/L  
 2011Q4 0.38 mg/L  
 2011Q3 0.42 mg/L  
 2011Q2 0.38 mg/L

## MW-3RR

2012Q3 2.2 mg/L  
 2012Q1 3.6 mg/L  
 2011Q4 2.3 mg/L  
 2011Q3 2.5 mg/L

## MW-4

2011Q3 0.34 mg/L

## MW-5

2012Q3 0.58 mg/L  
 2012Q1 0.73 mg/L  
 2011Q4 0.67 mg/L  
 2011Q3 0.67 mg/L  
 2011Q2 0.731 mg/L

## CMW-1S

2012Q3 0.28 mg/L  
 2012Q1 0.35 mg/L  
 2011Q4 0.270 mg/L  
 2011Q3 0.34 mg/L

## CMW-3D

2012Q3 0.5 mg/L  
 2012Q1 0.55 mg/L

## CMW-5D

2012Q3 0.35 mg/L  
 2012Q1 0.37 mg/L

## CMW-5S

2012Q3 2.4 mg/L  
 2012Q1 2.5 mg/L  
 2011Q4 2.2 mg/L  
 2011Q3 2.4 mg/L

## CMW-6D

2012Q3 0.71 mg/L  
 2012Q1 0.76 mg/L  
 2011Q4 0.60 mg/L

CMW-6S		P-4 (continued)	
2012Q1	0.27 mg/L	2011Q3	0.45 mg/L
		2011Q2	1.84 mg/L
CMW-7S		2011Q1	2.28 mg/L
2012Q3	0.75 mg/L	2010Q4	1.67 mg/L
2012Q1	0.72 mg/L	2010Q3	2.01 mg/L
2011Q4	0.60 mg/L	2010Q2	1.5 mg/L
2011Q3	0.48 mg/L	2010Q1	2.4 mg/L
		2009Q4	1.1 mg/L
KMW-15		2009Q3	1.4 mg/L
2012Q3	1.2 mg/L	2009Q2	1.2 mg/L
2012Q1	1.5 mg/L	2009Q1	1.5 mg/L
2011Q4	0.82 mg/L	2008Q4	1.5 mg/L
2011Q2	1.62 mg/L	2008Q3	1.3 mg/L
		2008Q2	1.5 mg/L
MW-9		2008Q1	1.4 mg/L
2012Q3	2.9 mg/L		
2012Q1	3.6 mg/L	P-5R	
2011Q4	0.98 mg/L	2012Q3	1.9 mg/L
2011Q3	1.4 mg/L	2012Q1	2.1 mg/L
2011Q2	0.52 mg/L	2011Q4	1.8 mg/L
		2011Q3	0.64 mg/L
P-1R		2011Q2	0.894 mg/L
2012Q3	0.31 mg/L	2011Q1	2.66 mg/L
2012Q1	0.32 mg/L	2010Q4	2.15 mg/L
2011Q4	0.34 mg/L	2010Q3	2.31 mg/L
2011Q2	0.334 mg/L	2010Q2	2.2 mg/L
		2010Q1	2.2 mg/L
P-2		2009Q4	1.9 mg/L
2012Q3	7.8 mg/L	2009Q3	2.4 mg/L
2012Q1	0.90 mg/L	2009Q2	2.3 mg/L
2011Q4	1.5 mg/L	2009Q1	2.4 mg/L
2011Q3	0.35 mg/L	2008Q4	2.3 mg/L
2011Q2	0.347 mg/L	2008Q3	2.5 mg/L
2011Q1	0.561 mg/L	2008Q2	2.4 mg/L
2010Q4	0.954 mg/L	2008Q1	2.7 mg/L
2010Q3	0.842 mg/L		
2009Q3	1.6 mg/L	P-6R	
2008Q4	1 mg/L	2012Q3	4.2 mg/L
2008Q3	1.4 mg/L	2012Q1	2.2 mg/L
2008Q2	0.71 mg/L	2011Q4	2.2 mg/L
		2011Q3	0.47 mg/L
P-4		2011Q2	3.60 mg/L
2012Q3	1.8 mg/L	2011Q1	3.98 mg/L
2012Q1	2.1 mg/L	2010Q4	4.54 mg/L
2011Q4	1.3 mg/L	2010Q3	4.88 mg/L

## P-6R (continued)

2010Q2	4.6 mg/L
2010Q1	4 mg/L
2009Q4	4.3 mg/L
2009Q3	4.6 mg/L
2009Q2	4.1 mg/L
2009Q1	4.4 mg/L
2008Q4	4.4 mg/L
2008Q3	4.4 mg/L
2008Q2	3.9 mg/L
2008Q1	3.2 mg/L

## P-7R

2012Q3	3.4 mg/L
2012Q1	3.8 mg/L
2011Q4	2.5 mg/L
2011Q3	0.33 mg/L
2011Q2	1.57 mg/L
2011Q1	4.03 mg/L
2010Q4	4.98 mg/L
2010Q3	3.8 mg/L
2010Q2	2.6 mg/L
2010Q1	2.9 mg/L
2009Q4	3.1 mg/L
2009Q3	3.4 mg/L
2009Q2	3.5 mg/L
2009Q1	3 mg/L
2008Q4	3 mg/L
2008Q3	3.1 mg/L

2008Q2	2.1 mg/L
2008Q1	1.8 mg/L

## P-8R

2012Q3	4.5 mg/L
2011Q4	5.8 mg/L
2011Q4	4.1 mg/L
2011Q3	1.1 mg/L
2011Q2	0.320 mg/L
2011Q1	6.37 mg/L
2010Q4	6.36 mg/L
2010Q3	5.38 mg/L
2010Q1	6.4 mg/L
2009Q4	6.2 mg/L
2009Q3	2.6 mg/L
2009Q2	5.6 mg/L

## P-8R (continued)

2009Q1	7.8 mg/L
2008Q4	6.9 mg/L
2008Q3	1.1 mg/L
2008Q2	5.0 mg/L
2008Q1	6.0 mg/L

## P-9

2012Q3	1.0 mg/L
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## P-9R

2012Q3	0.34 mg/L
2012Q1	0.27 mg/L
2011Q4	0.36 mg/L
2011Q2	5.94 mg/L
2011Q1	0.378 mg/L
2010Q4	0.388 mg/L
2010Q3	0.422 mg/L
2010Q2	0.29 mg/L
2010Q1	0.37 mg/L
2009Q4	0.29 mg/L
2009Q3	0.37 mg/L
2009Q2	0.35 mg/L
2009Q1	0.21 mg/L
2008Q4	0.31 mg/L
2008Q3	0.39 mg/L
2008Q2	0.38 mg/L
2008Q1	0.24 mg/L

## KMW-9

2012Q3	1.6 mg/L
2012Q1	1.6 mg/L
2011Q4	1.3 mg/L
2011Q3	0.37 mg/L
2011Q2	1.88 mg/L
2011Q1	1.15 mg/L
2010Q4	1.90 mg/L
2010Q3	2.33 mg/L
2010Q2	2 mg/L
2010Q1	1.7 mg/L
2009Q3	1.7 mg/L
2009Q2	2 mg/L
2009Q1	1.9 mg/L
2008Q4	1.3 mg/L
2008Q3	1.8 mg/L
2008Q2	1.9 mg/L



KMW-9 (continued)		2009Q2	3.5 mg/L
2008Q1	1.9 mg/L	2009Q1	3.8 mg/L
		2008Q4	4.3 mg/L
P-10		2008Q3	3.9 mg/L
2012Q3	1.2 mg/L	2008Q2	2.6 mg/L
2012Q1	1.1 mg/L	2008Q1	3.0 mg/L
2011Q4	1.0 mg/L		
2011Q3	0.88 mg/L	P-14R	
2011Q2	1.70 mg/L	2011Q1	0.543 mg/L
2011Q1	1.50 mg/L		
2010Q4	1.32 mg/L	P-17A	
2010Q1	1.1 mg/L	2012Q3	0.98 mg/L
2009Q2	1.4 mg/L	2012Q1	0.27 mg/L
2009Q1	1.4 mg/L	2011Q4	0.80 mg/L
2008Q4	0.75 mg/L	2011Q3	0.80 mg/L
2008Q2	1.4 mg/L	2011Q2	0.977 mg/L
2008Q1	0.88 mg/L	2011Q1	1.18 mg/L
		2010Q3	0.637 mg/L
P-12R		2009Q3	0.91 mg/L
2011Q1	0.406 mg/L	2008Q4	1 mg/L
2010Q4	0.355 mg/L	2008Q3	0.84 mg/L
2010Q3	0.851 mg/L	2008Q2	0.80 mg/L
2010Q2	0.8 mg/L	2008Q1	0.79 mg/L
2010Q1	0.84 mg/L		
2009Q4	0.35 mg/L	P-17B	
2009Q3	0.44 mg/L	2012Q3	1.2 mg/L
2009Q2	0.35 mg/L	2012Q1	1.2 mg/L
2009Q1	0.83 mg/L	2011Q4	1.0 mg/L
2008Q4	0.96 mg/L	2011Q3	1.0 mg/L
2008Q3	0.36 mg/L	2011Q2	1.56 mg/L
2008Q2	1.2 mg/L	2011Q1	1.84 mg/L
2008Q1	0.53 mg/L	2010Q4	1.63 mg/L
		2010Q3	1.51 mg/L
P-13R		2010Q2	1.5 mg/L
2012Q3	2.4 mg/L	2010Q1	1.5 mg/L
2012Q1	4.2 mg/L	2009Q4	1 mg/L
2011Q4	2.8 mg/L	2009Q3	1.5 mg/L
2011Q3	3.0 mg/L	2009Q2	1.5 mg/L
2011Q2	3.28 mg/L	2009Q1	1.8 mg/L
2011Q1	5.57 mg/L	2008Q4	1.4 mg/L
2010Q4	4.13 mg/L	2008Q3	1.2 mg/L
2010Q3	2.43 mg/L	2008Q2	1.4 mg/L
2010Q2	5.5 mg/L	2008Q1	1.1 mg/L
2010Q1	3.8 mg/L		
2009Q4	2.8 mg/L	P-18B	
2009Q3	1.9 mg/L	2012Q3	0.76 mg/L

P-18B *(continued)*

2012Q1	0.72 mg/L
2011Q4	0.82 mg/L
2011Q2	0.67 mg/L

## P-19AR

2012Q3	0.47 mg/L
2012Q1	0.67 mg/L
2011Q4	0.72 mg/L
2011Q3	0.5 mg/L

## P-20B

2012Q3	0.43 mg/L
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## KMW-8R

2012Q3	0.78 mg/L
2012Q1	0.96 mg/L
2011Q4	0.52 mg/L
2011Q2	0.973 mg/L

## P-21

2011Q4	0.73 mg/L
2011Q3	0.48 mg/L

## P-22

2012Q3	0.47 mg/L
2012Q1	0.72 mg/L
2011Q4	0.80 mg/L
2011Q3	0.45 mg/L

## HM-32R

2011Q4	0.35 mg/L
2011Q3	0.49 mg/L

## HM-54

2012Q1	0.30 mg/L
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**MOLYBDENUM****State Action Level: 0.03 mg/L****No Federal MCL**

LMW-2		LMW-8R	
2012Q3	0.081 mg/L	2011Q4	0.081 mg/L
2012Q1	0.075 mg/L	2011Q3	0.064 mg/L
2011Q4	0.070 mg/L		
2011Q3	0.072 mg/L	LMW-9	
		2012Q3	0.15 mg/L
LMW-3		2011Q4	0.18 mg/L
2012Q3	0.050 mg/L	2011Q3	0.17 mg/L
2012Q1	0.048 mg/L	2011Q2	0.188 mg/L
2011Q4	0.050 mg/L		
2011Q2	0.0495 mg/L	KMW-12	
		2012Q3	0.049 mg/L
LMW-4R		2012Q1	0.052 mg/L
2012Q3	0.095 mg/L	2011Q4	0.050 mg/L
2012Q1	0.089 mg/L	2011Q3	0.044 mg/L
2011Q4	0.091 mg/L	2011Q2	0.0538 mg/L
2011Q3	0.082 mg/L		
		KMW-16	
LMW-4		2012Q3	0.16 mg/L
2008Q4	0.099 mg/L	2012Q1	0.19 mg/L
		2011Q4	0.19 mg/L
LMW-5R		2011Q3	0.19 mg/L
2012Q3	0.047 mg/L	2011Q2	0.176 mg/L
2012Q1	0.042 mg/L		
2011Q4	0.044 mg/L	IMW-2D	
2011Q3	0.035 mg/L	2012Q3	0.18 mg/L
		2012Q1	0.17 mg/L
LMW-5		2011Q4	0.20 mg/L
2008Q4	0.058 mg/L	2011Q2	0.22 mg/L
2008Q3	0.057 mg/L		
2008Q2	0.064 mg/L	IMW-2SR	
2008Q1	0.065 mg/L	2012Q3	0.20 mg/L
		2012Q1	0.24 mg/L
LMW-6R		2011Q4	0.27 mg/L
2012Q3	0.069 mg/L	2011Q3	0.26 mg/L
2012Q1	0.060 mg/L		
2011Q4	0.047 mg/L	KMW-1D	
2011Q3	0.049 mg/L	2012Q3	0.17 mg/L
		2012Q1	0.16 mg/L
LMW-8R		2011Q2	0.192 mg/L
2012Q3	0.082 mg/L		
2012Q1	0.065 mg/L		

KMW-1M		MW-3RR	
2012Q3	0.78 mg/L	2012Q3	1.5 mg/L
2012Q1	0.91 mg/L	2012Q1	0.92 mg/L
2011Q4	0.73 mg/L	2011Q4	0.63 mg/L
2011Q2	1.26 mg/L	2011Q3	1.1 mg/L
KMW-1S		MW-5	
2012Q3	18 mg/L	2011Q4	0.030 mg/L
2012Q1	18 mg/L	2011Q2	0.0361 mg/L
2011Q4	8.3 mg/L		
2011Q3	0.2 mg/L	MW-6	
2011Q2	18.9 mg/L	2011Q4	0.032 mg/L
KMW-19		CMW-1D	
2012Q3	2.0 mg/L	2012Q3	0.052 mg/L
2012Q1	1.4 mg/L	2012Q1	0.056 mg/L
2011Q4	1.3 mg/L	2011Q4	0.063 mg/L
2011Q2	1.48 mg/L	2011Q3	0.058 mg/L
KMW-20		CMW-1S	
2012Q3	1.4 mg/L	2012Q3	0.053 mg/L
2012Q1	1.1 mg/L	2012Q1	0.051 mg/L
2011Q4	1.5 mg/L	2011Q4	0.062 mg/L
2011Q3	1.5 mg/L	2011Q3	0.067 mg/L
2011Q2	1.64 mg/L		
KMW-11		CMW-2D	
2012Q1	0.14 mg/L	2012Q3	0.066 mg/L
2011Q4	0.17 mg/L	2012Q1	0.066 mg/L
2011Q3	0.17 mg/L	2011Q4	0.10 mg/L
2011Q2	0.177 mg/L	2011Q3	0.1 mg/L
MW10-RR		CMW-2S	
2012Q3	0.58 mg/L	824/12	0.054 mg/L
2012Q1	0.43 mg/L	2012Q1	0.055 mg/L
2011Q4	0.43 mg/L	2011Q4	0.063 mg/L
2011Q3	0.57 mg/L	2011Q3	0.051 mg/L
MW-2R		CMW-3D	
2012Q3	0.050 mg/L	2012Q3	0.050 mg/L
2012Q1	0.054 mg/L	2012Q1	0.040 mg/L
2011Q4	0.075 mg/L	2011Q4	0.05 mg/L
2011Q3	0.077 mg/L	2011Q3	0.04 mg/L
2011Q2	0.0674 mg/L	CMW-3S	
		2012Q3	0.589 mg/L
		2012Q1	0.15 mg/L

CMW-3S ( <i>continued</i> )		KMW-15	
2011Q4	0.54 mg/L	2012Q3	0.13 mg/L
2011Q3	0.72 mg/L	2012Q1	0.17 mg/L
		2011Q4	0.083 mg/L
CMW-4D		2011Q3	17 mg/L
2011Q3	0.13 mg/L	2011Q2	0.174 mg/L
CMW-4S		MW-8	
2012Q3	0.040 mg/L	2012Q3	0.060 mg/L
		2012Q1	0.053 mg/L
CMW-5D		2011Q4	0.061 mg/L
2012Q3	0.052 mg/L	2011Q3	0.046 mg/L
2012Q1	0.37 mg/L	2011Q2	0.0656 mg/L
2011Q4	0.045 mg/L		
2011Q3	0.041 mg/L	P-1R	
		2012Q3	0.079 mg/L
CMW-5S		2012Q1	0.076 mg/L
2012Q3	0.24 mg/L	2011Q4	0.079 mg/L
2012Q1	2.5 mg/L	2011Q3	0.069 mg/L
2011Q4	0.22 mg/L	2011Q2	0.0796 mg/L
2011Q3	0.3 mg/L		
		P-2	
CMW-6D		2012Q3	1.4 mg/L
2012Q3	0.15 mg/L	2012Q1	2.0 mg/L
2012Q1	0.76 mg/L	2011Q4	1.8 mg/L
2011Q4	0.099 mg/L	2011Q3	0.95 mg/L
2011Q3	0.3 mg/L	2011Q2	1.97 mg/L
		2011Q1	2.12 mg/L
CMW-6S		2010Q4	2.26 mg/L
2012Q3	0.21 mg/L	2010Q3	4.42 mg/L
2012Q1	0.27 mg/L	2010Q2	2.5 mg/L
2011Q4	0.16 mg/L	2010Q1	2.3 mg/L
2011Q3	0.19 mg/L	2009Q4	2.3 mg/L
		2009Q3	2.4 mg/L
CMW-7D		2009Q2	2.5 mg/L
2012Q3	0.10 mg/L	2009Q1	2.5 mg/L
2012Q1	0.092 mg/L	2008Q4	2.3 mg/L
2011Q4	0.085 mg/L	2008Q3	2.3 mg/L
2011Q3	0.059 mg/L	2008Q2	2.7 mg/L
		2008Q1	2.8 mg/L
CMW-7S		P-4	
2012Q3	0.073 mg/L	2012Q3	1.2 mg/L
2012Q1	0.052 mg/L	2012Q1	1.5 mg/L
2011Q4	0.061 mg/L	2011Q4	0.83 mg/L
2011Q3	0.082 mg/L	2011Q3	0.30 mg/L

## P-4 (continued)

2011Q2	1.37 mg/L
2011Q1	1.36 mg/L
2010Q4	1.39 mg/L
2010Q3	1.51 mg/L
2010Q2	1.6 mg/L
2010Q1	1.2 mg/L
2009Q4	1.4 mg/L
2009Q3	1.4 mg/L
2009Q2	1.5 mg/L
2009Q1	1.4 mg/L
2008Q4	1.5 mg/L
2008Q3	1.4 mg/L
2008Q2	1.5 mg/L
2008Q1	1.5 mg/L

## P-5R

2012Q3	0.65 mg/L
2012Q1	0.24 mg/L
2011Q4	0.46 mg/L
2011Q3	0.22 mg/L
2011Q2	0.713 mg/L
2011Q1	0.738 mg/L
2010Q4	0.708 mg/L
2010Q3	0.75 mg/L
2010Q2	0.83 mg/L
2010Q1	0.83 mg/L
2009Q4	0.78 mg/L
2009Q3	0.75 mg/L
2009Q2	0.79 mg/L
2009Q1	0.79 mg/L
2008Q4	0.76 mg/L
2008Q3	0.74 mg/L
2008Q2	0.81 mg/L
2008Q1	0.79 mg/L

## P-6R

2012Q3	1.5 mg/L
2012Q1	0.57 mg/L
2011Q4	0.57 mg/L
2011Q3	0.13 mg/L
2011Q2	0.954 mg/L
2011Q1	1.06 mg/L
2010Q4	1.11 mg/L
2010Q3	1.26 mg/L
2010Q2	1.3 mg/L

## P-6R (continued)

2010Q1	1.2 mg/L
2009Q4	1.2 mg/L
2009Q3	1.3 mg/L
2009Q2	1.2 mg/L
2009Q1	1.2 mg/L
2008Q4	1.3 mg/L
2008Q3	1.1 mg/L
2008Q2	1.1 mg/L
2008Q1	0.95 mg/L

## P-7R

2012Q3	0.11 mg/L
2012Q1	0.29 mg/L
2011Q4	0.21 mg/L
2011Q3	0.031 mg/L
2011Q2	0.768 mg/L
2011Q1	0.435 mg/L
2010Q4	0.428 mg/L
2010Q3	0.624 mg/L
2010Q2	0.67 mg/L
2010Q1	0.34 mg/L
2009Q4	0.33 mg/L
2009Q3	0.35 mg/L
2009Q2	0.33 mg/L
2009Q1	0.35 mg/L
2008Q4	0.36 mg/L
2008Q3	0.32 mg/L
2008Q2	0.32 mg/L
2008Q1	0.27 mg/L

## P-8R

2012Q3	0.50 mg/L
2011Q4	0.58 mg/L
2011Q4	0.43 mg/L
2011Q3	0.12 mg/L
2011Q2	0.116 mg/L
2011Q1	0.810 mg/L
2010Q4	0.687 mg/L
2010Q3	0.971 mg/L
2010Q2	1.7 mg/L
2010Q1	0.73 mg/L
2009Q4	0.99 mg/L
2009Q3	1.6 mg/L
2009Q2	1.1 mg/L
2009Q1	0.75 mg/L

## P-8R (continued)

2008Q4	0.8 mg/L
2008Q3	1.4 mg/L
2008Q2	0.72 mg/L
2008Q1	0.78 mg/L

## P-9

2012Q3	1.3 mg/L
2011Q4	0.65 mg/L
2011Q3	0.15 mg/L

## P-9R

2012Q3	0.11 mg/L
2012Q1	0.072 mg/L
2011Q4	0.11 mg/L
2011Q3	0.079 mg/L
2011Q2	0.799 mg/L
2011Q1	0.124 mg/L
2010Q4	0.123 mg/L
2010Q3	0.126 mg/L
2010Q2	0.14 mg/L
2010Q1	0.13 mg/L
2009Q4	0.13 mg/L
2009Q3	0.12 mg/L
2009Q2	0.14 mg/L
2009Q1	0.16 mg/L
2008Q4	0.14 mg/L
2008Q3	0.13 mg/L
2008Q2	0.14 mg/L
2008Q1	0.24 mg/L

## KMW-9

2012Q3	0.080 mg/L
2012Q1	0.13 mg/L
2011Q4	0.17 mg/L
2011Q3	0.050 mg/L
2011Q2	0.241 mg/L
2011Q1	0.566 mg/L
2010Q4	0.254 mg/L
2010Q3	0.251 mg/L
2010Q2	0.27 mg/L
2010Q1	0.24 mg/L
2009Q4	0.23 mg/L
2009Q3	0.25 mg/L
2009Q2	0.27 mg/L
2009Q1	0.26 mg/L

## KMW-9 (continued)

2008Q4	0.8 mg/L
2008Q3	0.26 mg/L
2008Q2	0.28 mg/L
2008Q1	0.27 mg/L

## P-10

2012Q3	1.2 mg/L
2012Q1	0.78 mg/L
2011Q4	0.62 mg/L
2011Q3	0.76 mg/L
2011Q2	1.55 mg/L
2011Q1	1.18 mg/L
2010Q4	1.50 mg/L
2010Q3	1.42 mg/L
2010Q2	0.44 mg/L
2010Q1	0.97 mg/L
2009Q4	0.67 mg/L
2009Q3	1.2 mg/L
2009Q2	0.56 mg/L
2009Q1	0.6 mg/L
2008Q4	0.27 mg/L
2008Q3	1.0 mg/L
2008Q2	0.72 mg/L
2008Q1	1.0 mg/L

## P-11

2012Q3	0.074 mg/L
2012Q1	0.068 mg/L
2011Q4	0.093 mg/L
2011Q3	0.075 mg/L
2011Q2	0.0926 mg/L
2011Q1	0.0931 mg/L
2010Q4	0.0968 mg/L
2010Q3	0.104 mg/L
2010Q2	0.1 mg/L
2010Q1	0.091 mg/L
2009Q4	0.1 mg/L
2009Q3	0.097 mg/L
2009Q2	0.1 mg/L
2009Q1	0.11 mg/L
2008Q4	0.1 mg/L
2008Q3	0.099 mg/L
2008Q2	0.11 mg/L
2008Q1	0.11 mg/L

## P-12

2012Q3	0.10 mg/L
2012Q1	0.12 mg/L
2011Q4	0.14 mg/L
2011Q2	0.165 mg/L
2011Q1	0.187 mg/L
2010Q4	0.191 mg/L
2010Q3	0.21 mg/L
2010Q2	0.2 mg/L
2010Q1	0.19 mg/L
2009Q4	0.2 mg/L
2009Q3	0.19 mg/L
2009Q2	0.21 mg/L
2009Q1	0.2 mg/L
2008Q4	0.2 mg/L
2008Q3	0.18 mg/L
2008Q2	0.21 mg/L
2008Q1	0.19 mg/L

## P-13R

2012Q3	2.4 mg/L
2012Q1	5.8 mg/L
2011Q4	3.4 mg/L
2011Q3	2.7 mg/L
2011Q2	5.82 mg/L
2011Q1	5.37 mg/L
2010Q4	3.89 mg/L
2010Q3	2.62 mg/L
2010Q2	6.9 mg/L
2010Q1	5.6 mg/L
2009Q4	3.8 mg/L
2009Q3	1.8 mg/L
2009Q2	4.9 mg/L
2009Q1	5.7 mg/L
2008Q4	6.3 mg/L
2008Q3	6.3 mg/L
2008Q2	3.9 mg/L
2008Q1	4.4 mg/L

## P-14R

2012Q3	1.1 mg/L
2012Q1	1.1 mg/L
2011Q4	0.90 mg/L
2011Q3	1.2 mg/L
2011Q2	1.35 mg/L
2011Q1	1.37 mg/L

## P-14R (continued)

2010Q4	1.37 mg/L
2010Q3	1.55 mg/L
2010Q2	1.4 mg/L
2010Q1	1.3 mg/L
2009Q4	1.6 mg/L
2009Q3	1.6 mg/L
2009Q2	1.4 mg/L
2009Q1	1.1 mg/L
2008Q4	1.5 mg/L
2008Q3	1.6 mg/L
2008Q2	1.5 mg/L
2008Q1	1.0 mg/L

## P-15AR

2012Q3	0.031 mg/L
2011Q4	0.033 mg/L
2010Q4	0.0388 mg/L
2010Q2	0.05 mg/L
2010Q1	0.039 mg/L
2009Q4	0.045 mg/L
2009Q3	0.047 mg/L
2009Q2	0.055 mg/L
2009Q1	0.058 mg/L
2008Q4	0.055 mg/L
2008Q3	0.052 mg/L
2008Q2	0.058 mg/L
2008Q1	0.052 mg/L

## P-17A

2012Q3	0.035 mg/L
2012Q1	0.046 mg/L
2011Q4	0.10 mg/L
2011Q3	0.16 mg/L
2011Q2	0.167 mg/L
2011Q1	0.298 mg/L
2010Q4	0.278 mg/L
2010Q3	0.35 mg/L
2010Q2	0.62 mg/L
2010Q1	0.67 mg/L
2009Q4	0.22 mg/L
2009Q3	0.74 mg/L
2009Q2	0.38 mg/L
2009Q1	0.5 mg/L
2008Q4	1.1 mg/L
2008Q3	0.24 mg/L



## P-17A (continued)

2008Q2 0.31 mg/L  
2008Q1 0.33 mg/L

## P-17B

2012Q3 0.079 mg/L  
2012Q1 0.040 mg/L  
2011Q4 0.096 mg/L  
2011Q3 0.18 mg/L  
2011Q2 0.172 mg/L  
2011Q1 0.198 mg/L  
2010Q4 0.157 mg/L  
2010Q2 0.19 mg/L  
2010Q1 0.19 mg/L  
2009Q4 0.21 mg/L  
2009Q3 0.2 mg/L  
2009Q2 0.22 mg/L  
2009Q1 0.26 mg/L  
2008Q4 0.21 mg/L  
2008Q3 0.20 mg/L  
2008Q2 0.23 mg/L  
2008Q1 0.24 mg/L

## P-18B

2012Q3 0.18 mg/L  
2012Q1 0.27 mg/L  
2011Q4 0.15 mg/L  
2011Q3 0.12 mg/L  
2011Q2 0.152 mg/L

## P-19AR

2012Q3 0.084 mg/L  
2012Q1 0.080 mg/L  
2011Q4 0.10 mg/L  
2011Q3 0.11 mg/L

## P-20A

2012Q3 0.15 mg/L  
2012Q1 0.14 mg/L  
2011Q4 0.24 mg/L  
2011Q3 0.16 mg/L  
2011Q2 0.674 mg/L

## P-20B

2012Q3 0.10 mg/L  
2012Q1 0.095 mg/L

## P-20B (continued)

2011Q4 0.079 mg/L  
2011Q3 0.13 mg/L  
2011Q2 0.126 mg/L

## KMW-8R

2012Q3 0.14 mg/L  
2012Q1 0.081 mg/L  
2011Q4 0.074 mg/L  
2011Q2 0.174 mg/L

## P-21

2012Q3 0.14 mg/L  
2012Q1 0.13 mg/L  
2011Q4 0.041 mg/L

## P-22

2012Q3 0.062 mg/L  
2012Q1 0.061 mg/L  
2011Q4 0.082 mg/L  
2011Q3 0.13 mg/L

## IMW-16S

2012Q3 0.070 mg/L  
2012Q1 0.066 mg/L  
2011Q4 0.069 mg/L  
2011Q3 0.072 mg/L  
2011Q2 0.0825 mg/L

## IMW-13R

2011Q4 0.30 mg/L  
2011Q3 0.061 mg/L  
2011Q2 0.058 mg/L

## IMW-14R

2012Q3 0.40 mg/L  
2012Q1 0.42 mg/L  
2011Q4 0.48 mg/L  
2011Q3 0.39 mg/L  
2011Q2 0.497 mg/L

## IMW-15

2012Q1 0.03 mg/L  
2011Q4 0.036 mg/L  
2011Q3 0.033 mg/L  
2011Q2 0.0611 mg/L

IMW-17		HM-54 ( <i>continued</i> )	
2012Q3	0.12 mg/L	2012Q1	0.092 mg/L
2012Q1	0.12 mg/L	2011Q4	0.098 mg/L
2011Q4	0.14 mg/L	2011Q3	0.11 mg/L
2011Q3	0.14 mg/L	2011Q2	0.11 mg/L
2011Q2	0.143 mg/L		
		HM-60	
HM-8		2012Q3	0.030 mg/L
2012Q3	0.035 mg/L		
HM-48			
2012Q1	0.040 mg/L		
2011Q4	0.051 mg/L		
2011Q3	0.048 mg/L		
2011Q2	0.044 mg/L		
HM-28			
2012Q3	0.039 mg/L		
2012Q1	0.041 mg/L		
2011Q4	0.044 mg/L		
2011Q3	0.04 mg/L		
2011Q2	0.0444 mg/L		
HM-32R			
2012Q3	0.051 mg/L		
2012Q1	0.16 mg/L		
2011Q4	0.22 mg/L		
2011Q3	0.22 mg/L		
HM-33			
2011Q4	0.03 mg/L		
2011Q2	0.0302 mg/L		
HM-52R			
2011Q4	0.033 mg/L		
2011Q3	0.032 mg/L		
HM-53			
2012Q3	0.10 mg/L		
2012Q1	0.093 mg/L		
2011Q4	0.10 mg/L		
2011Q3	0.097 mg/L		
2011Q2	0.125 mg/L		
HM-54			
2012Q3	0.13 mg/L		

**SELENIUM****State Action Level: 0.05 mg/L****SDWA Primary MCL: 0.05 mg/L****RCRA MCL: 0.01 mg/L**

LMW-6R		MW-6	
2012Q3	0.21 mg/L	2012Q3	0.14 mg/L
2011Q3	0.063 mg/L		
		CMW-1D	
LMW-9		2012Q3	0.21 mg/L
2012Q3	0.19 mg/L		
		CMW-1S	
KMW-16		2012Q3	0.20 mg/L
2012Q3	0.16 mg/L		
		CMW-2D	
IMW-2SR		2012Q3	0.54 mg/L
2012Q3	0.17 mg/L		
		CMW-2S	
KMW-1D		2012Q3	0.38 mg/L
2012Q3	0.14 mg/L		
		CMW-3D	
KMW-1M		2012Q3	0.22 mg/L
2012Q3	0.19 mg/L		
		CMW-3S	
KMW-1S		2012Q3	0.31 mg/L
2012Q3	0.75 mg/L		
		CMW-4D	
KMW-19		2012Q3	0.15 mg/L
2012Q3	0.18 mg/L		
		CMW-4S	
KMW-20		2012Q3	0.16 mg/L
2012Q3	0.18 mg/L		
		CMW-5D	
MW-10RR		2012Q3	0.23 mg/L
2012Q3	0.66 mg/L		
		CMW-5S	
MW-2R		2012Q3	0.95 mg/L
2012Q3	0.19 mg/L	2012Q1	0.14 mg/L
		2011Q4	0.1 mg/L
		CMW-6D	
MW-3RR		2012Q3	0.89 mg/L
2012Q3	0.69 mg/L		
		CMW-6S	
MW-5		2012Q3	0.78 mg/L
2012Q3	0.17 mg/L	2012Q1	0.068 mg/L

CMW-7D		P-8R ( <i>continued</i> )	
2012Q3	0.22 mg/L	2008Q3	0.064 mg/L
CMW-7S		P-9	
2012Q3	0.23 mg/L	6/11	0.059 mg/L
KMW-15		P-10	
2012Q3	0.72 mg/L	2012Q3	0.72 mg/L
2012Q1	0.062 mg/L		
2011Q4	0.14 mg/L	P-14R	
MW-1R		2012Q3	0.44 mg/L
2012Q3	0.20 mg/L	P-15AR	
MW-4		2011Q1	0.233 mg/L
2012Q3	0.18 mg/L	P-17A	
MW-8		2011Q4	0.070 mg/L
2012Q3	0.20 mg/L	2008Q3	0.059 mg/L
MW-9		2008Q1	0.052 mg/L
2012Q3	0.20 mg/L	P-17B	
P-2		2011Q4	0.087 mg/L
2011Q3	0.059 mg/L	2008Q3	0.052 mg/L
P-4		2008Q1	0.066 mg/L
2011Q3	0.064 mg/L	P-20B	
P-5R		2011Q4	0.47 mg/L
2012Q3	0.72 mg/L	P-21	
P-6R		2012Q3	0.21 mg/L
2012Q3	1.4 mg/L	IMW-14R	
2012Q1	0.12 mg/L	2012Q1	0.053 mg/L
2011Q4	0.12 mg/L	IMW-15	
2011Q3	0.084 mg/L	2011Q3	0.052 mg/L
2008Q3	0.087 mg/L	HM-8	
P-7R		2012Q3	0.068 mg/L
2012Q3	1.6 mg/L	2012Q1	0.070 mg/L
2011Q3	0.11 mg/L	HM-48	
2008Q3	0.18 mg/L	2012Q1	0.054 mg/L
P-8R		HM-24	
2012Q3	3.5 mg/L	2012Q3	0.081 mg/L
2011Q3	0.074 mg/L		

HM-31R	
2012Q3	0.15 mg/L
2012Q1	0.072

**SODIUM****State Action Level: 520 mg/L****No Federal MCL**

LMW-2		LMW-8R ( <i>continued</i> )	
2012Q3	720 mg/L	2012Q1	870 mg/L
2012Q1	710 mg/L	2011Q4	990 mg/L
2011Q4	800 mg/L	2011Q3	880 mg/L
2011Q3	700 mg/L		
2011Q2	662 mg/L	KMW-12	
		2012Q3	550 mg/L
LMW-3		2012Q1	580 mg/L
2012Q3	840 mg/L	2011Q4	580 mg/L
2012Q1	860 mg/L	2011Q3	530 mg/L
2011Q4	940 mg/L		
2011Q2	752 mg/L	KMW-1M	
		2012Q3	780 mg/L
LMW-4R		2012Q1	1500 mg/L
2012Q3	880 mg/L	2011Q4	1200 mg/L
2012Q1	910 mg/L	2011Q2	1420 mg/L
2011Q4	1000 mg/L		
2011Q3	920 mg/L	KMW-1S	
		2012Q3	10,000 mg/L
LMW-4		2012Q1	10,000 mg/L
2008Q4	830 mg/L	2011Q4	11,000 mg/L
		2011Q3	11000 mg/L
LMW-5R		2011Q2	10300 mg/L
2012Q3	690 mg/L		
2012Q1	800 mg/L	KMW-19	
2011Q4	740 mg/L	2012Q3	780 mg/L
2011Q3	810 mg/L	2012Q1	940 mg/L
		2011Q4	930 mg/L
LMW-5			
2008Q4	600 mg/L	KMW-20	
2008Q3	580 mg/L	2012Q3	1200 mg/L
2008Q2	640 mg/L	2012Q1	1300 mg/L
2008Q1	630 mg/L	2011Q4	1300 mg/L
		2011Q3	1400 mg/L
LMW-6R		2011Q2	1350 mg/L
2012Q3	810 mg/L		
2012Q1	900 mg/L	MW10-RR	
2011Q4	1100 mg/L	2012Q3	2800 mg/L
2011Q3	950 mg/L	2012Q1	2600 mg/L
		2011Q4	3100 mg/L
LMW-8R		2011Q3	2900 mg/L
2012Q3	850 mg/L		

MW-2R		CMW-3D ( <i>continued</i> )	
2012Q3	2200 mg/L	2012Q1	980 mg/L
2012Q1	2000 mg/L	2011Q4	1200 mg/L
2011Q4	2000 mg/L	2011Q3	1200 mg/L
2011Q3	2100 mg/L		
2011Q2	1540 mg/L	CMW-3S	
		2012Q3	4500 mg/L
MW-3RR		2012Q1	3000 mg/L
2012Q3	4200 mg/L	2011Q4	8700 mg/L
2012Q1	4600 mg/L	2011Q3	6600 mg/L
2011Q4	5000 mg/L		
2011Q3	4600 mg/L	CMW-5D	
		2012Q3	2400 mg/L
MW-5		2012Q1	2300 mg/L
2012Q3	840 mg/L	2011Q4	1700 mg/L
2012Q1	1400 mg/L	2011Q3	1700 mg/L
2011Q4	1600 mg/L		
2011Q3	1100	CMW-5S	
2011Q2	1510	2012Q3	15,000 mg/L
		2012Q1	15,000 mg/L
CMW-1D		2011Q4	17,000 mg/L
2012Q3	600 mg/L	2011Q3	16,000 mg/L
2012Q1	640 mg/L		
2011Q4	740 mg/L	CMW-6D	
2011Q3	840 mg/L	2012Q3	3400 mg/L
		2012Q1	3000 mg/L
CMW-1S		2011Q4	3600 mg/L
2012Q3	630 mg/L	2011Q3	3700 mg/L
2012Q1	650 mg/L		
2011Q4	730 mg/L	CMW-6S	
2011Q3	860 mg/L	2012Q3	4100 mg/L
		2012Q1	3000 mg/L
CMW-2D		2011Q4	4900 mg/L
2012Q3	2600 mg/L	2011Q3	4600 mg/L
2012Q1	2500 mg/L		
2011Q4	2400 mg/L	CMW-7D	
2011Q3	2300 mg/L	2012Q3	1200 mg/L
		2012Q1	1300 mg/L
CMW-2S		2011Q4	1200 mg/L
2012Q3	1200 mg/L	2011Q3	710 mg/L
2012Q1	1600 mg/L		
2011Q4	1800 mg/L	CMW-7S	
2011Q3	1700 mg/L	2012Q3	1100 mg/L
		2012Q1	1100 mg/L
CMW-3D		2011Q4	1200 mg/L
2012Q3	990 mg/L	2011Q3	1400 mg/L

KMW-15		P-2 (continued)	
2012Q3	8100 mg/L	2009Q3	8900 mg/L
2012Q1	9800 mg/L	2009Q2	8700 mg/L
2011Q4	18,000 mg/L	2009Q1	10,000 mg/L
2011Q3	10,000 mg/L	2008Q4	8900 mg/L
2011Q2	10,500 mg/L	2008Q3	10,000 mg/L
		2008Q2	10,000 mg/L
MW-4		2008Q1	9400 mg/L
2012Q3	640 mg/L		
2012Q1	660 mg/L	P-4	
2011Q4	780 mg/L	2012Q3	15,000 mg/L
2011Q3	890 mg/L	2012Q1	16000 mg/L
2011Q2	924 mg/L	2011Q4	17,000 mg/L
		2011Q3	22,000 mg/L
MW-8		2011Q2	15,600 mg/L
2012Q3	700 mg/L	2011Q1	14,300 mg/L
2012Q1	720 mg/L	2010Q4	14,400 mg/L
2011Q4	730 mg/L	2010Q3	14,000 mg/L
2011Q3	720 mg/L	2010Q2	16000 mg/L
2011Q2	774 mg/L	2010Q1	17000 mg/L
		2009Q4	13,000 mg/L
MW-9		2009Q3	15,000 mg/L
2012Q3	970 mg/L	2009Q2	16,000 mg/L
2012Q1	1500 mg/L	2009Q1	19,000 mg/L
2011Q4	1700 mg/L	2008Q4	16,000 mg/L
2011Q3	1400 mg/L	2008Q3	16,000 mg/L
2011Q2	1300 mg/L	2008Q2	17,000 mg/L
		2008Q1	15,000 mg/L
P-1R			
2012Q3	550 mg/L	P-5R	
2012Q1	600 mg/L	2012Q3	11,000 mg/L
2011Q4	540 mg/L	2012Q1	12,000 mg/L
2011Q2	573 mg/L	2011Q4	14,000 mg/L
		2011Q3	18,000 mg/L
P-2		2011Q2	11,200 mg/L
2012Q3	8200 mg/L	2011Q1	10,800 mg/L
2012Q1	8300 mg/L	2010Q4	11,800 mg/L
2011Q4	9800 mg/L	2010Q3	10,800 mg/L
2011Q3	13,000 mg/L	2010Q2	13,000 mg/L
2011Q2	7770 mg/L	2010Q1	13,000 mg/L
2011Q1	8000 mg/L	2009Q4	11,000 mg/L
2010Q4	8260 mg/L	2009Q3	12,000 mg/L
2010Q3	7680 mg/L	2009Q2	11,000 mg/L
2010Q2	8400 mg/L	2009Q1	15,000 mg/L
2010Q1	8600 mg/L	2008Q4	13,000 mg/L
2009Q4	7600 mg/L	2008Q3	13,000 mg/L



## P-5R (continued)

2008Q2	14,000 mg/L
2008Q1	14,000 mg/L

## P-6R

2012Q3	34,000 mg/L
2012Q1	31,000 mg/L
2011Q4	31,000 mg/L
2011Q3	33,000 mg/L
2011Q2	22,600 mg/L
2011Q1	23,700 mg/L
2010Q4	30,700 mg/L
2010Q3	21,800 mg/L
2010Q2	29,000 mg/L
2010Q1	33,000 mg/L
2009Q4	33,000 mg/L
2009Q3	33,000 mg/L
2009Q2	27,000 mg/L
2009Q1	34,000 mg/L
2008Q4	32,000 mg/L
2008Q3	37,000 mg/L
2008Q2	32,000 mg/L
2008Q1	28,000 mg/L

## P-7R

2012Q3	60,000 mg/L
2012Q1	25,000 mg/L
2011Q4	30,000 mg/L
2011Q3	50,000 mg/L
2011Q2	28,800 mg/L
2011Q1	19,500 mg/L
2010Q4	20,400 mg/L
2010Q3	30,600 mg/L
2010Q2	38,000 mg/L
2010Q1	44,000 mg/L
2009Q4	38,000 mg/L
2009Q3	45,000 mg/L
2009Q2	48,000 mg/L
2009Q1	34,000 mg/L
2008Q4	39,000 mg/L
2008Q3	45,000 mg/L
2008Q2	35,000 mg/L
2008Q1	21,000 mg/L

## P-8R

2012Q3	41,000 mg/L
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## P-8R (continued)

2011Q4	26000 mg/L
2011Q4	16,000 mg/L
2011Q3	25,000 mg/L
2011Q2	2060 mg/L
2011Q1	20,600 mg/L
2010Q4	36,500 mg/L
2010Q3	34,500 mg/L
2010Q2	28,000 mg/L
2010Q1	43,000 mg/L
2009Q4	31,000 mg/L
2009Q3	20,000 mg/L
2009Q2	32,000 mg/L
2009Q1	50,000 mg/L
2008Q4	40,000 mg/L
2008Q3	25,000 mg/L
2008Q2	35,000 mg/L
2008Q1	35,000 mg/L

## P-9

2012Q3	20,000 mg/L
2011Q4	17,000 mg/L
2011Q3	21,000 mg/L

## P-9R

2012Q3	2100 mg/L
2012Q1	2200 mg/L
2011Q4	2400 mg/L
2011Q3	2300 mg/L
2011Q2	21,400 mg/L
2011Q1	2080 mg/L
2010Q4	2140 mg/L
2010Q3	1960 mg/L
2010Q2	2100 mg/L
2010Q1	2900 mg/L
2009Q4	2100 mg/L
2009Q3	1900 mg/L
2009Q2	2000 mg/L
2009Q1	2600 mg/L
2008Q4	2100 mg/L
2008Q3	2400 mg/L
2008Q2	2300 mg/L
2008Q1	2200 mg/L

## KMW-9

2012Q3	15,000 mg/L
2012Q1	6200 mg/L
2011Q4	16,000 mg/L
2011Q3	22,000 mg/L
2011Q2	13,000 mg/L
2011Q1	9220 mg/L
2010Q4	13,600 mg/L
2010Q3	15,200 mg/L
2010Q2	15000 mg/L
2010Q1	14000 mg/L
2009Q4	12,000 mg/L
2009Q3	12,000 mg/L
2009Q2	14,000 mg/L
2009Q1	16,000 mg/L
2008Q4	7500 mg/L
2008Q3	16,000 mg/L
2008Q2	17,000 mg/L
2008Q1	15,000 mg/L

## P-10

2012Q3	6100 mg/L
2012Q1	5800 mg/L
2011Q4	7100 mg/L
2011Q3	7000 mg/L
2011Q2	7480 mg/L
2011Q1	7040 mg/L
2010Q4	5950 mg/L
2010Q3	8510 mg/L
2010Q2	8100 mg/L
2010Q1	8500 mg/L
2009Q4	6600 mg/L
2009Q3	7400 mg/L
2009Q2	7300 mg/L
2009Q1	9900 mg/L
2008Q4	13,000 mg/L
2008Q3	7600 mg/L
2008Q2	8200 mg/L
2008Q1	8100 mg/L

## P-11

2012Q3	1600 mg/L
2012Q1	670 mg/L
2011Q4	670 mg/L
2011Q3	660 mg/L
2011Q2	629 mg/L

## P-11 (continued)

2011Q1	615 mg/L
2010Q4	598 mg/L
2010Q3	637 mg/L
2010Q2	680 mg/L
2010Q1	590 mg/L
2009Q4	690 mg/L
2009Q3	620 mg/L
2009Q2	680 mg/L
2009Q1	780 mg/L
2008Q4	690 mg/L
2008Q3	750 mg/L
2008Q2	800 mg/L
2008Q1	730 mg/L

## P-12

2012Q3	1200 mg/L
2012Q1	1000 mg/L
2011Q4	1100 mg/L
2011Q2	1060 mg/L
2011Q1	978 mg/L
2010Q4	861 mg/L
2010Q3	966 mg/L
2010Q2	890 mg/L
2010Q1	910 mg/L
2009Q4	1100 mg/L
2009Q3	880 mg/L
2009Q2	990 mg/L
2009Q1	1100 mg/L
2008Q4	970 mg/L
2008Q3	1100 mg/L
2008Q2	1100 mg/L
2008Q1	1000 mg/L

## P-13R

2012Q3	6000 mg/L
2012Q1	8100 mg/L
2011Q4	7300 mg/L
2011Q3	7500 mg/L
2011Q2	7270 mg/L
2011Q1	3040 mg/L
2010Q4	6280 mg/L
2010Q2	7800 mg/L
2010Q1	6900 mg/L
2009Q4	7300 mg/L
2009Q3	4000 mg/L

## P-13R (continued)

2009Q2	6700 mg/L
2009Q1	9100 mg/L
2008Q4	8500 mg/L
2008Q3	10,000 mg/L
2008Q2	6400 mg/L
2008Q1	6200 mg/L

## P-14R

2012Q3	6300 mg/L
2012Q1	2900 mg/L
2011Q4	6300 mg/L
2011Q3	6600 mg/L
2011Q2	5700 mg/L
2011Q1	4510 mg/L
2010Q4	5860 mg/L
2010Q2	5400 mg/L
2010Q1	6000 mg/L
2009Q4	7200 mg/L
2009Q3	5200 mg/L
2009Q2	5400 mg/L
2009Q1	6600 mg/L
2008Q4	5200 mg/L
2008Q3	5900 mg/L
2008Q2	6800 mg/L
2008Q1	6100 mg/L

## P-15AR

2012Q3	2100 mg/L
2012Q1	2200 mg/L
2011Q4	1700 mg/L
2011Q3	2300 mg/L
2011Q2	2000 mg/L
2011Q1	1970 mg/L
2010Q4	1640 mg/L
2010Q3	1730 mg/L
2010Q2	2200 mg/L
2010Q1	2900 mg/L
2009Q4	2100 mg/L
2009Q3	1800 mg/L
2009Q2	2400 mg/L
2009Q1	2900 mg/L
2008Q4	2800 mg/L
2008Q3	3100 mg/L
2008Q2	3000 mg/L
2008Q1	3000 mg/L

## P-17A

2012Q3	12,000 mg/L
2012Q1	12,000 mg/L
2011Q4	14,000 mg/L
2011Q3	12,000 mg/L
2011Q2	10,900 mg/L
2011Q1	7940 mg/L
2010Q4	11,500 mg/L
2010Q3	12,200 mg/L
2010Q2	11000 mg/L
2010Q1	13000 mg/L
2009Q4	9300 mg/L
2009Q3	9900 mg/L
2009Q2	9500 mg/L
2009Q1	13,000 mg/L
2008Q4	12,000 mg/L
2008Q3	11,000 mg/L
2008Q2	12,000 mg/L
2008Q1	9300 mg/L

## P-17B

2012Q3	22,000 mg/L
2012Q1	21,000 mg/L
2011Q4	16,000 mg/L
2011Q3	22,000 mg/L
2011Q2	17,300 mg/L
2011Q1	17,000 mg/L
2010Q4	19,100 mg/L
2010Q3	17,300 mg/L
2010Q2	17,000 mg/L
2010Q1	19,000 mg/L
2009Q4	12,000 mg/L
2009Q3	18,000 mg/L
2009Q2	18,000 mg/L
2009Q1	22,000 mg/L
2008Q4	17,000 mg/L
2008Q3	19,000 mg/L
2008Q2	21,000 mg/L
2008Q1	17,000 mg/L

## P-18B

2012Q3	1700 mg/L
2012Q1	1500 mg/L
2011Q4	1700 mg/L
2011Q3	1400 mg/L
2011Q2	1430 mg/L

P-19AR		IMW-14R ( <i>continued</i> )	
2012Q3	660 mg/L	2011Q2	1800 mg/L
2012Q1	650 mg/L		
2011Q4	700 mg/L	IMW-15	
2011Q3	610 mg/L	2012Q1	1600 mg/L
		2011Q4	1800 mg/L
P-20A		2011Q3	2000 mg/L
2012Q3	1700 mg/L	2011Q2	1860 mg/L
2012Q1	1200 mg/L		
2011Q4	2100 mg/L	IMW-17	
2011Q3	2300 mg/L	2012Q3	550 mg/L
2011Q2	6460 mg/L	2011Q4	570 mg/L
		2011Q3	540 mg/L
KMW-8R			
2012Q3	6400 mg/L	HM-8	
2012Q1	6700 mg/L	2012Q3	820 mg/L
2011Q4	7500 mg/L	2012Q1	800 mg/L
2011Q2	6020 mg/L	2011Q4	870 mg/L
		2011Q3	840 mg/L
P-21		2011Q2	891 mg/L
2012Q3	1400 mg/L		
2012Q1	1300 mg/L	HM-48	
2011Q4	920 mg/L	2012Q1	560 mg/L
2011Q3	990 mg/L	2011Q2	598 mg/L
P-22		HM-19	
2012Q3	2200 mg/L	2012Q3	710 mg/L
2012Q1	1800 mg/L	2012Q1	710 mg/L
2011Q4	1800 mg/L	2011Q4	720 mg/L
2011Q3	1600 mg/L	2011Q3	580 mg/L
		2011Q2	676 mg/L
IMW-16S			
2012Q1	930 mg/L	HM-24	
2011Q4	1000 mg/L	2012Q3	890 mg/L
2011Q3	880 mg/L	2012Q1	840 mg/L
2011Q2	873 mg/L	2011Q4	880 mg/L
		2011Q3	810 mg/L
IMW-13R		2011Q2	826 mg/L
2011Q3	650 mg/L		
2011Q2	618 mg/L	HM-28	
		2012Q3	620 mg/L
IMW-14R		2012Q1	600 mg/L
2012Q3	1700 mg/L	2011Q4	630 mg/L
2012Q1	1500 mg/L	2011Q2	558 mg/L
2011Q4	1400 mg/L		
2011Q3	1000 mg/L		

HM-31R  
2012Q3 1100 mg/L  
2012Q1 880 mg/L  
2011Q4 840 mg/L  
2011Q2 824 mg/L

HM-32R  
2012Q3 2100 mg/L  
2012Q1 7600 mg/L  
2011Q4 8600 mg/L  
2011Q3 7600 mg/L

HM-52R  
2012Q3 600 mg/L  
2012Q1 680 mg/L  
2011Q4 690 mg/L  
2011Q3 680 mg/L

HM-53  
2012Q3 970 mg/L  
2012Q1 1100 mg/L  
2011Q4 1100 mg/L  
2011Q3 920 mg/L  
2011Q2 992 mg/L

HM-54  
2012Q3 1600 mg/L  
2012Q1 1600 mg/L  
2011Q4 1600 mg/L  
2011Q3 1500 mg/L  
2011Q2 1460 mg/L

**SULFATE****State Action Level: 1070 mg/L****SDWA Secondary MCL: 250 mg/L**

LMW-2		LMW-8R ( <i>continued</i> )	
2012Q3	2400 mg/L	2012Q1	3200 mg/L
2012Q1	2600 mg/L	2011Q4	3000 mg/L
2011Q4	2700 mg/L	2011Q3	3200 mg/L
2011Q3	2600 mg/L		
2011Q2	2650 mg/L	LMW-9	
		2012Q3	1600 mg/L
LMW-3		2012Q1	1900 mg/L
2012Q3	2800 mg/L	2011Q4	1800 mg/L
2012Q1	3000 mg/L	2011Q3	1900 mg/L
2011Q4	2800 mg/L	2011Q2	1950 mg/L
2011Q2	2840 mg/L		
		KMW-12	
LMW-4R		2012Q3	2100 mg/L
2012Q3	2500 mg/L	2012Q1	2200 mg/L
2012Q1	2700 mg/L	2011Q4	2200 mg/L
2011Q4	2700 mg/L	2011Q3	2200 mg/L
2011Q3	2700 mg/L	2011Q2	2030 mg/L
LMW-4		KMW-16	
2008Q4	2300 mg/L	2012Q3	1500 mg/L
		2012Q1	1300 mg/L
LMW-5R		2011Q4	1400 mg/L
2012Q3	2400 mg/L	2011Q3	1300 mg/L
2012Q1	3000 mg/L	2011Q2	1270 mg/L
2011Q4	2700 mg/L		
2011Q3	2900 mg/L	IMW-2D	
		2012Q3	1200 mg/L
LMW-5			
2008Q4	1700 mg/L	IMW-2SR	
2008Q3	1700 mg/L	2012Q3	1500 mg/L
2008Q2	1700 mg/L	2012Q1	1700 mg/L
2008Q1	1500 mg/L	2011Q4	1600 mg/L
		2011Q3	1700 mg/L
LMW-6R			
2012Q3	2200 mg/L	KMW-1M	
2012Q1	2700 mg/L	2012Q3	5800 mg/L
2011Q4	2500 mg/L	2012Q1	6800 mg/L
2011Q3	2600 mg/L	2011Q4	5500 mg/L
		2011Q2	5580 mg/L
LMW-8R			
2012Q3	3000 mg/L		

KMW-1S		MW-5	
2012Q3	25,000 mg/L	2012Q3	3400 mg/L
2012Q1	26,000 mg/L	2012Q1	4100 mg/L
2011Q4	27,000 mg/L	2011Q4	4100 mg/L
2011Q3	27,000 mg/L	2011Q3	3200 mg/L
2011Q2	34,200 mg/L	2011Q2	3810 mg/L
KMW-19		CMW-1D	
2012Q3	4400 mg/L	2012Q3	2000 mg/L
2012Q1	4800 mg/L	2012Q1	2300 mg/L
2011Q4	4800 mg/L	2011Q4	2900 mg/L
2011Q2	4700 mg/L	2011Q3	1900 mg/L
KMW-20		CMW-1S	
2012Q3	4700 mg/L	2012Q3	2200 mg/L
2012Q1	5000 mg/L	2012Q1	2500 mg/L
2011Q4	5100 mg/L	2011Q4	2500 mg/L
2011Q3	5000 mg/L	2011Q3	2700 mg/L
2011Q2	5060 mg/L	CMW-2D	
KMW-11		2012Q3	6400 mg/L
2012Q1	1600 mg/L	2012Q1	6800 mg/L
2011Q4	1500 mg/L	2011Q4	3100 mg/L
2011Q3	1400 mg/L	2011Q3	4600 mg/L
2011Q2	1490 mg/L	CMW-2S	
MW10-RR		2012Q3	3400 mg/L
2012Q3	6700 mg/L	2012Q1	3400 mg/L
2012Q1	7700 mg/L	2011Q4	1700 mg/L
2011Q4	7400 mg/L	2011Q3	3400 mg/L
2011Q3	7000 mg/L	CMW-3D	
MW-2R		2012Q3	3000 mg/L
2012Q3	4100 mg/L	2012Q1	3200 mg/L
2012Q1	4600 mg/L	2011Q4	3100 mg/L
2011Q4	4600 mg/L	2011Q3	3200 mg/L
2011Q3	4500 mg/L	CMW-3S	
2011Q2	14,400 mg/L	2012Q3	9300 mg/L
MW-3RR		2012Q1	11,000 mg/L
2012Q3	14,000 mg/L	2011Q4	12,000 mg/L
2012Q1	21,000 mg/L	2011Q3	12,000 mg/L
2011Q4	17,000 mg/L	CMW-5D	
2011Q3	14,000 mg/L	2012Q3	5400 mg/L
		2012Q1	5900 mg/L

CMW-5D ( <i>continued</i> )		MW-1R ( <i>continued</i> )	
2011Q4	3800 mg/L	2011Q2	1750 mg/L
2011Q3	3600 mg/L		
		MW-4	
CMW-5S		2012Q3	1300 mg/L
2012Q3	32,000 mg/L	2012Q1	1400 mg/L
2012Q1	36,000 mg/L	2011Q4	1300 mg/L
2011Q4	36,000 mg/L	2011Q3	1500 mg/L
2011Q3	38,000 mg/L	2011Q2	1540 mg/L
CMW-6D		MW-8	
2012Q3	7500 mg/L	2012Q3	1900 mg/L
2012Q1	8600 mg/L	2012Q1	1900 mg/L
2011Q4	8200 mg/L	2011Q4	1800 mg/L
2011Q3	8300 mg/L	2011Q3	1900 mg/L
		2011Q2	1770 mg/L
CMW-6S		MW-9	
2012Q3	8500 mg/L	2012Q3	5400 mg/L
2012Q1	10,000 mg/L	2012Q1	5900 mg/L
2011Q4	10,000 mg/L	2011Q4	4600 mg/L
2011Q3	10,000 mg/L	2011Q3	4500 mg/L
		2011Q2	4600 mg/L
CMW-7D		P-1R	
2012Q3	3100 mg/L	2012Q3	2400 mg/L
2012Q1	4000 mg/L	2012Q1	2400 mg/L
2011Q4	3200 mg/L	2011Q4	2300 mg/L
2011Q3	1900 mg/L	2011Q3	2200 mg/L
		2011Q2	2650 mg/L
CMW-7S		P-2	
2012Q3	3800 mg/L	2012Q3	18,000 mg/L
2012Q1	4200 mg/L	2012Q1	20,000 mg/L
2011Q4	3900 mg/L	2011Q4	19,000 mg/L
2011Q3	4300 mg/L	2011Q3	19,000 mg/L
		2011Q2	22,100 mg/L
		2011Q1	19,800 mg/L
		2010Q4	19,500 mg/L
		2010Q3	19,300 mg/L
		2010Q2	20,000 mg/L
		2010Q1	19,000 mg/L
		2009Q4	20,000 mg/L
		2009Q3	20,000 mg/L
		2009Q2	21,000 mg/L
		2009Q1	20,000 mg/L
KMW-15			
2012Q3	19,000 mg/L		
2012Q1	27,000 mg/L		
2011Q4	46,000 mg/L		
2011Q3	17,000 mg/L		
2011Q2	27,000 mg/L		
MW-1R			
2012Q3	1800 mg/L		
2012Q1	1900 mg/L		
2011Q4	1900 mg/L		
2011Q3	2000 mg/L		



## P-2 (continued)

2008Q4	21,000 mg/L
2008Q3	23,000 mg/L
2008Q2	21,000 mg/L
2008Q1	22,000 mg/L

## P-4

2012Q3	37,000 mg/L
2012Q1	41,000 mg/L
2011Q4	38,000 mg/L
2011Q3	34,000 mg/L
2011Q2	48,900 mg/L
2011Q1	37,400 mg/L
2010Q4	36,200 mg/L
2010Q3	34,500 mg/L
2010Q2	36,000 mg/L
2010Q1	36,000 mg/L
2009Q4	34,000 mg/L
2009Q3	35,000 mg/L
2009Q2	35,000 mg/L
2009Q1	35,000 mg/L
2008Q4	35,000 mg/L
2008Q3	36,000 mg/L
2008Q2	38,000 mg/L
2008Q1	33,000 mg/L

## P-5R

2012Q3	23,000 mg/L
2012Q1	30,000 mg/L
2011Q4	28,000 mg/L
2011Q3	24,000 mg/L
2011Q2	33,300 mg/L
2011Q1	32,700 mg/L
2010Q4	28,000 mg/L
2010Q3	26,200 mg/L
2010Q2	28,000 mg/L
2010Q1	29,000 mg/L
2009Q4	28,000 mg/L
2009Q3	26,000 mg/L
2009Q2	27,000 mg/L
2009Q1	27,000 mg/L
2008Q4	27,000 mg/L
2008Q3	27,000 mg/L
2008Q2	28,000 mg/L
2008Q1	29,000 mg/L

## P-6R

2012Q3	48,000 mg/L
2012Q1	50,000 mg/L
2011Q4	50,000 mg/L
2011Q3	73,000 mg/L
2011Q2	69,600 mg/L
2011Q1	70,300 mg/L
2010Q4	56,700 mg/L
2010Q3	51,200 mg/L
2010Q2	64,000 mg/L
2010Q1	75,000 mg/L
2009Q4	84,000 mg/L
2009Q3	80,000 mg/L
2009Q2	59,000 mg/L
2009Q1	68,000 mg/L
2008Q4	79,000 mg/L
2008Q3	81,000 mg/L
2008Q2	65,000 mg/L
2008Q1	61,000 mg/L

## P-7R

2012Q3	44,000 mg/L
2012Q1	61,000 mg/L
2011Q4	44,000 mg/L
2011Q3	45,000 mg/L
2011Q2	69,200 mg/L
2011Q1	58,000 mg/L
2010Q4	36,200 mg/L
2010Q3	59,600 mg/L
2010Q2	86,000 mg/L
2010Q1	93,000 mg/L
2009Q4	90,000 mg/L
2009Q3	110,000 mg/L
2009Q2	110,000 mg/L
2009Q1	66,000 mg/L
2008Q4	95,000 mg/L
2008Q3	110,000 mg/L
2008Q2	64,000 mg/L
2008Q1	52,000 mg/L

## P-8R

2012Q3	50,000 mg/L
2011Q4	82,000 mg/L
2011Q3	55,000 mg/L
2011Q2	54,000 mg/L
2011Q1	79,600 mg/L

## P-8R (continued)

2011Q1	64,200 mg/L
2010Q4	58,300 mg/L
2010Q3	52,900 mg/L
2010Q2	51,000 mg/L
2010Q1	98,000 mg/L
2009Q4	78,000 mg/L
2009Q3	51,000 mg/L
2009Q2	58,000 mg/L
2009Q1	97,000 mg/L
2008Q4	98,000 mg/L
2008Q3	52,000 mg/L
2008Q2	71,000 mg/L
2008Q1	83,000 mg/L

## P-9

2012Q3	44,000 mg/L
2011Q4	6400 mg/L
2011Q3	47,000 mg/L

## P-9R

2012Q3	5200 mg/L
2012Q1	5700 mg/L
2011Q4	6100 mg/L
2011Q3	5500 mg/L
2011Q2	5610 mg/L
2011Q1	5020 mg/L
2010Q4	4710 mg/L
2010Q3	5250 mg/L
2010Q2	5100 mg/L
2010Q1	6200 mg/L
2009Q4	5200 mg/L
2009Q3	5400 mg/L
2009Q2	5000 mg/L
2009Q1	4900 mg/L
2008Q4	5300 mg/L
2008Q3	5400 mg/L
2008Q2	5000 mg/L
2008Q1	4700 mg/L

## KMW-9

2012Q3	31,000 mg/L
2012Q1	36,000 mg/L
2011Q4	34,000 mg/L
2011Q3	33,000 mg/L
2011Q2	42,000 mg/L

## KMW-9 (continued)

2011Q1	23,100 mg/L
2010Q4	32,200 mg/L
2010Q3	32,900 mg/L
2010Q2	33,000 mg/L
2010Q1	32,000 mg/L
2009Q4	32,000 mg/L
2009Q3	34,000 mg/L
2009Q2	33,000 mg/L
2009Q1	32,000 mg/L
2008Q4	20,000 mg/L
2008Q3	36,000 mg/L
2008Q2	32,000 mg/L
2008Q1	31,000 mg/L

## P-10

2012Q3	15,000 mg/L
2012Q1	17,000 mg/L
2011Q4	18,000 mg/L
2011Q3	14,000 mg/L
2011Q2	22,400 mg/L
2011Q1	19,700 mg/L
2010Q4	16,000 mg/L
2010Q3	22,500 mg/L
2010Q2	19,000 mg/L
2010Q1	20,000 mg/L
2009Q4	18,000 mg/L
2009Q3	22,000 mg/L
2009Q2	19,000 mg/L
2009Q1	18,000 mg/L
2008Q4	35,000 mg/L
2008Q3	19,000 mg/L
2008Q2	18,000 mg/L
2008Q1	18,000 mg/L

## P-11

2012Q3	2600 mg/L
2012Q1	2800 mg/L
2011Q4	3600 mg/L
2011Q3	2600 mg/L
2011Q2	2940 mg/L
2011Q1	2900 mg/L
2010Q4	2640 mg/L
2010Q3	2440 mg/L
2010Q2	2500 mg/L
2010Q1	2400 mg/L

## P-11 (continued)

2009Q4	2800 mg/L
2009Q3	2600 mg/L
2009Q2	2500 mg/L
2009Q1	2500 mg/L
2008Q4	2600 mg/L
2008Q3	2700 mg/L
2008Q2	2600 mg/L
2008Q1	2300 mg/L

## P-12

2012Q3	3300 mg/L
2012Q1	3700 mg/L
2011Q4	2900 mg/L
2011Q2	2920 mg/L
2011Q1	3480 mg/L
2010Q4	3730 mg/L
2010Q3	3110 mg/L
2010Q2	3400 mg/L
2010Q1	3300 mg/L
2009Q4	3600 mg/L
2009Q3	3400 mg/L
2009Q2	3300 mg/L
2009Q1	3200 mg/L
2008Q4	3500 mg/L
2008Q3	3000 mg/L
2008Q2	3400 mg/L
2008Q1	2900 mg/L

## P-13R

2012Q3	15,000 mg/L
2012Q1	24,000 mg/L
2011Q4	22,000 mg/L
2011Q3	16,000 mg/L
2011Q2	24,400 mg/L
2011Q1	19,700 mg/L
2010Q4	20,300 mg/L
2010Q3	12,200 mg/L
2010Q2	21,000 mg/L
2010Q1	18,000 mg/L
2009Q4	17,000 mg/L
2009Q3	11,000 mg/L
2009Q2	17,000 mg/L
2009Q1	19,000 mg/L
2008Q4	23,000 mg/L
2008Q3	24,000 mg/L

## P-13R (continued)

2008Q2	16,000 mg/L
2008Q1	14,000 mg/L

## P-14R

2012Q3	11,000 mg/L
2012Q1	12,000 mg/L
2011Q4	12,000 mg/L
2011Q3	14,000 mg/L
2011Q2	12,400 mg/L
2011Q1	9210 mg/L
2010Q4	7840 mg/L
2010Q3	10,500 mg/L
2010Q2	10000 mg/L
2010Q1	10,000 mg/L
2009Q4	9300 mg/L
2009Q3	8900 mg/L
2009Q2	10,000 mg/L
2009Q1	10,000 mg/L
2008Q4	8900 mg/L
2008Q3	9300 mg/L
2008Q2	9400 mg/L
2008Q1	10,000 mg/L

## P-15AR

2012Q3	5100 mg/L
2012Q1	5900 mg/L
2011Q4	5500 mg/L
2011Q3	5800 mg/L
2011Q2	6600 mg/L
2011Q1	6100 mg/L
2010Q4	5160 mg/L
2010Q3	5110 mg/L
2010Q2	5600 mg/L
2010Q1	5200 mg/L
2009Q4	5100 mg/L
2009Q3	4700 mg/L
2009Q2	6100 mg/L
2009Q1	5200 mg/L
2008Q4	5800 mg/L
2008Q3	7400 mg/L
2008Q2	6000 mg/L
2008Q1	6700 mg/L

P-17A		P-19AR	
2012Q3	39,000 mg/L	2012Q3	3700 mg/L
2012Q1	41,000 mg/L	2012Q1	3500 mg/L
2011Q4	43,000 mg/L	2011Q4	3400 mg/L
2011Q3	20,000 mg/L	2011Q3	3800 mg/L
2011Q2	40,500 mg/L		
2011Q1	34,500 mg/L	P-20A	
2010Q4	55,800 mg/L	2012Q3	4400 mg/L
2010Q3	39,400 mg/L	2012Q1	3900 mg/L
2010Q2	34,000 mg/L	2011Q4	4800 mg/L
2010Q1	32,000 mg/L	2011Q3	5200 mg/L
2009Q4	30,000 mg/L	2011Q2	15,700 mg/L
2009Q3	32,000 mg/L		
2009Q2	35,000 mg/L	P-20B	
2009Q1	33,000 mg/L	2012Q3	2100 mg/L
2008Q4	39,000 mg/L	2012Q1	2500 mg/L
2008Q3	31,000 mg/L	2011Q4	2200 mg/L
2008Q2	34,000 mg/L	2011Q3	2200 mg/L
2008Q1	28,000 mg/L	2011Q2	2510 mg/L
P-17B		KMW-8R	
2012Q3	58,000 mg/L	2012Q3	17,000 mg/L
2012Q1	62,000 mg/L	2012Q1	18,000 mg/L
2011Q4	57,000 mg/L	2011Q4	17,000 mg/L
2011Q3	58,000 mg/L	2011Q2	20,500 mg/L
2011Q2	64,800 mg/L		
2011Q1	54,400 mg/L	P-21	
2010Q4	62,100 mg/L	2012Q3	4100 mg/L
2010Q3	49,500 mg/L	2012Q1	4600 mg/L
2010Q2	45,000 mg/L	2011Q4	2900 mg/L
2010Q1	44,000 mg/L	2011Q3	3500 mg/L
2009Q4	36,000 mg/L		
2009Q3	53,000 mg/L	P-22	
2009Q2	52,000 mg/L	2012Q3	6100 mg/L
2009Q1	48,000 mg/L	2012Q1	5600 mg/L
2008Q4	51,000 mg/L	2011Q4	5100 mg/L
2008Q3	48,000 mg/L	2011Q3	5200 mg/L
2008Q2	46,000 mg/L		
2008Q1	42,000 mg/L	IMW-16S	
		2012Q3	1900 mg/L
P-18B		2012Q1	2300 mg/L
2012Q3	5200 mg/L	2011Q4	2200 mg/L
2012Q1	5300 mg/L	2011Q3	2200 mg/L
2011Q4	4700 mg/L	2011Q2	2360 mg/L
2011Q3	5100 mg/L		

IMW-9R		HM-52R ( <i>continued</i> )	
2011Q4	1700 mg/L	2012Q1	1400 mg/L
		2011Q4	1300 mg/L
IMW-13R		2011Q3	1300 mg/L
2011Q4	1200 mg/L		
2011Q3	1300 mg/L	HM-53	
2011Q2	1260 mg/L	2012Q3	2400 mg/L
		2012Q1	3200 mg/L
IMW-14R		2011Q4	3000 mg/L
2012Q3	2600 mg/L	2011Q3	3000 mg/L
2012Q1	2500 mg/L	2011Q2	3200 mg/L
2011Q4	2500 mg/L		
2011Q3	2600 mg/L	HM-54	
2011Q2	2940 mg/L	2012Q3	3400 mg/L
		2012Q1	4000 mg/L
IMW-15		2011Q4	3700 mg/L
2012Q1	3500 mg/L	2011Q3	37,000 mg/L
2011Q4	1200 mg/L	2011Q2	3470 mg/L
2011Q3	4100 mg/L		
2011Q2	4110 mg/L		
HM-19			
2012Q3	1100 mg/L		
2012Q1	1300 mg/L		
2011Q4	1300 mg/L		
2011Q3	1400 mg/L		
2011Q2	1230 mg/L		
HM-28			
2012Q3	1200 mg/L		
2012Q1	1400 mg/L		
2011Q4	1300 mg/L		
2011Q3	1300 mg/L		
2011Q2	1140 mg/L		
HM-31R			
2012Q3	1200 mg/L		
HM-32R			
2012Q3	4500 mg/L		
2012Q1	18,000 mg/L		
2011Q4	17,000 mg/L		
2011Q3	18,000 mg/L		
HM-52R			
2012Q3	1200 mg/L		

**TOTAL DISSOLVED SOLIDS****State Action Level: 2570 mg/L****SDWA Secondary MCL: 500 mg/L**

LMW-2		LMW-8R ( <i>continued</i> )	
2012Q3	4660 mg/L	2012Q1	4962 mg/L
2012Q1	4626 mg/L	2011Q4	5740 mg/L
2011Q4	4440 mg/L	2011Q3	5928 mg/L
2011Q3	4708 mg/L		
2011Q2	4430 mg/L	LMW-9	
		2012Q3	3228 mg/L
LMW-3		2012Q1	3312 mg/L
2012Q3	5700 mg/L	2011Q4	3224 mg/L
2012Q1	5140 mg/L	2011Q3	3300 mg/L
2011Q4	5044 mg/L	2011Q2	3440 mg/L
2011Q2	5110 mg/L		
		KMW-12	
LMW-4R		2012Q3	3992 mg/L
2012Q3	4724 mg/L	2012Q1	3816 mg/L
2012Q1	6036 mg/L	2011Q4	3828 mg/L
2011Q4	4640 mg/L	2011Q3	3984 mg/L
2011Q3	4824 mg/L	2011Q2	3820 mg/L
LMW-4		IMW-2SR	
2008Q4	4300 mg/L	2012Q3	2716 mg/L
		2012Q1	2792 mg/L
LMW-5R		2011Q4	2652 mg/L
2012Q3	4628 mg/L	2011Q3	3006 mg/L
2012Q1	5354 mg/L		
2011Q4	2700 mg/L	KMW-1M	
2011Q3	5000 mg/L	2012Q3	9860 mg/L
		2012Q1	12,380 mg/L
LMW-5		2011Q4	9490 mg/L
2008Q4	3200 mg/L	2011Q2	11,600 mg/L
2008Q3	3200 mg/L		
2008Q2	3100 mg/L	KMW-1S	
2008Q1	3200 mg/L	2012Q3	45,900 mg/L
		2012Q1	42,360 mg/L
LMW-6R		2011Q4	42,100 mg/L
2012Q3	4696 mg/L	2011Q3	42,300 mg/L
2012Q1	5000 mg/L	2011Q2	39,200 mg/L
2011Q4	4832 mg/L		
2011Q3	4916 mg/L	KMW-19	
		2012Q3	7636 mg/L
LMW-8R		2012Q1	7688 mg/L
2012Q3	5900 mg/L	2011Q4	8380 mg/L

KMW-19 ( <i>continued</i> )		CMW-1S	
2011Q2	7980 mg/L	2012Q3	4252 mg/L
		2012Q1	4480 mg/L
KMW-20		2011Q4	4612 mg/L
2012Q3	8280 mg/L	2011Q3	5184 mg/L
2012Q1	8140 mg/L		
2011Q4	8300 mg/L	CMW-2D	
2011Q3	8290 mg/L	2012Q3	12,280 mg/L
2011Q2	9040 mg/L	2012Q1	12,080 mg/L
		2011Q4	8760 mg/L
KMW-11		2011Q3	8870 mg/L
2012Q1	2604 mg/L		
2011Q4	2640 mg/L	CMW-2S	
2011Q2	2620 mg/L	2012Q3	7600 mg/L
		2012Q1	6944 mg/L
MW10-RR		2011Q4	6750 mg/L
2012Q3	15,160 mg/L	2011Q3	6880 mg/L
2012Q1	14,620 mg/L		
2011Q4	15,320 mg/L	CMW-3D	
2011Q3	15,220 mg/L	2012Q3	5892 mg/L
		2012Q1	5800 mg/L
MW-2R		2011Q4	6160 mg/L
2012Q3	10,220 mg/L	2011Q3	6184 mg/L
2012Q1	10,570 mg/L		
2011Q4	9790 mg/L	CMW-3S	
2011Q3	10,470 mg/L	2012Q3	16,700 mg/L
2011Q2	8680 mg/L	2012Q1	18,780 mg/L
		2011Q4	19,980 mg/L
MW-3RR		2011Q3	20,760 mg/L
2012Q3	27,180 mg/L		
2012Q1	32,140 mg/L	CMW-5D	
2011Q4	31,440 mg/L	2012Q3	11,800 mg/L
2011Q3	25,700 mg/L	2012Q1	11,200 mg/L
		2011Q4	7360 mg/L
MW-5		2011Q3	7470 mg/L
2012Q3	7000 mg/L		
2012Q1	8412 mg/L	CMW-5S	
2011Q4	7960 mg/L	2012Q3	67,900 mg/L
2011Q3	6708 mg/L	2012Q1	64,700 mg/L
2011Q2	8200 mg/L	2011Q4	65,900 mg/L
		2011Q3	71,000 mg/L
CMW-1D			
2012Q3	4044 mg/L	CMW-6D	
2012Q1	4092 mg/L	2012Q3	17,880 mg/L
2011Q4	3648 mg/L	2012Q1	17,140 mg/L
2011Q3	3708 mg/L	2011Q4	17,280 mg/L

## CMW-6D (continued)

2011Q3 16,120 mg/L

## CMW-6S

2012Q3 18,360 mg/L

2012Q1 19,720 mg/L

2011Q4 20,040 mg/L

2011Q3 19,400 mg/L

## CMW-7D

2012Q3 5532 mg/L

2012Q1 6072 mg/L

2011Q4 5584 mg/L

2011Q3 4096 mg/L

## CMW-7S

2012Q3 6448 mg/L

2012Q1 6576 mg/L

2011Q4 7100 mg/L

2011Q3 7450 mg/L

## KMW-15

2012Q3 34,200 mg/L

2012Q1 41,000 mg/L

2011Q4 46,300 mg/L

2011Q3 35,800 mg/L

2011Q2 41,000 mg/L

## MW-1R

2012Q3 3652 mg/L

2012Q1 3692 mg/L

2011Q4 3672 mg/L

2011Q3 3912 mg/L

2011Q2 3840 mg/L

## MW-4

2012Q3 3044 mg/L

2012Q1 3216 mg/L

2011Q4 3408 mg/L

2011Q3 3688 mg/L

2011Q2 3980 mg/L

## MW-8

2012Q3 4200 mg/L

2012Q1 3924 mg/L

2011Q4 3804 mg/L

## MW-8 (continued)

2011Q3 4140 mg/L

2011Q2 3910 mg/L

## MW-9

2012Q3 11,100 mg/L

2012Q1 10,710 mg/L

2011Q4 9100 mg/L

2011Q3 9320 mg/L

2011Q2 10,800 mg/L

## P-1R

2012Q3 4608 mg/L

2012Q1 4398 mg/L

2011Q4 4340 mg/L

2011Q3 4328 mg/L

2011Q2 4310 mg/L

## P-2

2012Q3 38,900 mg/L

2012Q1 36,740 mg/L

2011Q4 36,700 mg/L

2011Q3 36,700 mg/L

2011Q2 34,900 mg/L

2011Q1 36,900 mg/L

2010Q4 37,600 mg/L

2010Q3 38,200 mg/L

2010Q2 39000 mg/L

2010Q1 40000 mg/L

2009Q4 38,000 mg/L

2009Q3 33,000 mg/L

2009Q2 39,000 mg/L

2009Q1 40,000 mg/L

2008Q4 42,000 mg/L

2008Q3 41,000 mg/L

2008Q2 42,000 mg/L

2008Q1 41,000 mg/L

## P-4

2012Q3 63,900 mg/L

2012Q1 65,500 mg/L

2011Q4 62,100 mg/L

2011Q3 62,500 mg/L

2011Q2 59,500 mg/L

2011Q1 61,300 mg/L

2010Q4 60,500 mg/L



## P-4 (continued)

2010Q3	61,400 mg/L
2010Q2	62,000 mg/L
2010Q1	63,000 mg/L
2009Q4	60,000 mg/L
2009Q3	40,000 mg/L
2009Q2	61,000 mg/L
2009Q1	62,000 mg/L
2008Q4	62,000 mg/L
2008Q3	61,000 mg/L
2008Q2	61,000 mg/L
2008Q1	60,000 mg/L

## P-5R

2012Q3	50,800 mg/L
2012Q1	50,300 mg/L
2011Q4	50,900 mg/L
2011Q3	46,100 mg/L
2011Q2	49,000 mg/L
2011Q1	49,600 mg/L
2010Q4	51,100 mg/L
2010Q3	49,500 mg/L
2010Q2	53,000 mg/L
2010Q1	56,000 mg/L
2009Q4	53,000 mg/L
2009Q3	50,000 mg/L
2009Q2	51,000 mg/L
2009Q1	53,000 mg/L
2008Q4	55,000 mg/L
2008Q3	51,000 mg/L
2008Q2	54,000 mg/L
2008Q1	56,000 mg/L

## P-6R

2012Q3	114,600 mg/L
2012Q1	89,600 mg/L
2011Q4	89,600 mg/L
2011Q3	119,600 mg/L
2011Q2	85,500 mg/L
2011Q1	88,200 mg/L
2010Q4	111,000 mg/L
2010Q3	96,300 mg/L
2010Q2	100,000 mg/L
2010Q1	120,000 mg/L
2009Q4	81,000 mg/L
2009Q3	80,000 mg/L

## P-6R (continued)

2009Q2	97,000 mg/L
2009Q1	120,000 mg/L
2008Q4	120,000 mg/L
2008Q3	120,000 mg/L
2008Q2	110,000 mg/L
2008Q1	110,000 mg/L

## P-7R

2012Q3	166,200 mg/L
2012Q1	85,800 mg/L
2011Q4	84,200 mg/L
2011Q3	146,800 mg/L
2011Q2	106,000 mg/L
2011Q1	101,000 mg/L
2010Q4	108,000 mg/L
2010Q3	91,000 mg/L
2010Q2	130,000 mg/L
2010Q1	150,000 mg/L
2009Q4	140,000 mg/L
2009Q3	86,000 mg/L
2009Q2	140,000 mg/L
2009Q1	110,000 mg/L
2008Q4	140,000 mg/L
2008Q3	150,000 mg/L
2008Q2	100,000 mg/L
2008Q1	87,000 mg/L

## P-8R

2012Q3	158,400 mg/L
2011Q4	96,100 mg/L
2011Q3	93,000 mg/L
2011Q2	103,600 mg/L
2011Q1	94,900 mg/L
2010Q4	102,000 mg/L
2010Q3	110,000 mg/L
2010Q2	139,000 mg/L
2010Q1	82,000 mg/L
2009Q4	160,000 mg/L
2009Q3	120,000 mg/L
2009Q2	83,000 mg/L
2009Q1	93,000 mg/L
2008Q4	160,000 mg/L
2008Q3	150,000 mg/L
2008Q2	80,000 mg/L
2008Q1	120,000 mg/L

## P-8R (continued)

2008Q1 140,000 mg/L

## P-9

2012Q3 78,000 mg/L

2011Q4 74,800 mg/L

2011Q3 75,500 mg/L

## P-9R

2012Q3 9890 mg/L

2012Q1 9800 mg/L

2011Q4 10,230 mg/L

2011Q3 9940 mg/L

2011Q2 9960 mg/L

2011Q1 11,100 mg/L

2010Q4 10,400 mg/L

2010Q3 9680 mg/L

2010Q2 9800 mg/L

2010Q1 12,000 mg/L

2009Q4 9800 mg/L

2009Q3 9000 mg/L

2009Q2 9700 mg/L

2009Q1 10,000 mg/L

2008Q4 9300 mg/L

2008Q3 9800 mg/L

2008Q2 9600 mg/L

2008Q1 9700 mg/L

## KMW-9

2012Q3 58,300 mg/L

2012Q1 55,400 mg/L

2011Q4 55,500 mg/L

2011Q3 55,500 mg/L

2011Q2 51,300 mg/L

2011Q1 43,600 mg/L

2010Q4 52,200 mg/L

2010Q3 69,800 mg/L

2010Q2 54,000 mg/L

2010Q1 56,000 mg/L

2009Q4 55,000 mg/L

2009Q3 66,000 mg/L

2009Q2 56,000 mg/L

2009Q1 57,000 mg/L

2008Q4 38,000 mg/L

2008Q3 57,000 mg/L

2008Q2 57,000 mg/L

## KMW-9 (continued)

2008Q1 56,000 mg/L

## P-10

2012Q3 30,040 mg/L

2012Q1 28,980 mg/L

2011Q4 29,340 mg/L

2011Q3 28,000 mg/L

2011Q2 32,400 mg/L

2011Q1 38,900 mg/L

2010Q4 31,200 mg/L

2010Q3 46,200 mg/L

2010Q2 37,000 mg/L

2010Q1 42,000 mg/L

2009Q4 36,000 mg/L

2009Q3 52,000 mg/L

2009Q2 34,000 mg/L

2009Q1 37,000 mg/L

2008Q4 57,000 mg/L

2008Q3 33,000 mg/L

2008Q2 32,000 mg/L

2008Q1 34,000 mg/L

## P-11

2012Q3 4544 mg/L

2012Q1 4712 mg/L

2011Q4 4720 mg/L

2011Q3 4828 mg/L

2011Q2 4560 mg/L

2011Q1 4540 mg/L

2010Q4 4720 mg/L

2010Q3 4640 mg/L

2010Q2 4500 mg/L

2010Q1 4700 mg/L

2009Q4 4700 mg/L

2009Q3 3400 mg/L

2009Q2 4400 mg/L

2009Q1 4400 mg/L

2008Q4 4600 mg/L

2008Q3 4600 mg/L

2008Q2 4700 mg/L

2008Q1 4500 mg/L

## P-12

2012Q3 5760 mg/L

2012Q1 5856 mg/L

## P-12 (continued)

2011Q4	6008 mg/L
2011Q2	6340 mg/L
2011Q1	5380 mg/L
2010Q4	5310 mg/L
2010Q3	5610 mg/L
2010Q2	5500 mg/L
2010Q1	5800 mg/L
2009Q4	5700 mg/L
2009Q3	4800 mg/L
2009Q2	5300 mg/L
2009Q1	5600 mg/L
2008Q4	5600 mg/L
2008Q3	5300 mg/L
2008Q2	5800 mg/L
2008Q1	5200 mg/L

## P-13R

2012Q3	27,060 mg/L
2012Q1	38,560 mg/L
2011Q4	38,000 mg/L
2011Q3	29,200 mg/L
2011Q2	33,500 mg/L
2011Q1	38,400 mg/L
2010Q4	28,400 mg/L
2010Q3	26,600 mg/L
2010Q2	36,000 mg/L
2010Q1	35,000 mg/L
2009Q4	30,000 mg/L
2009Q3	18,000 mg/L
2009Q2	32,000 mg/L
2009Q1	37,000 mg/L
2008Q4	42,000 mg/L
2008Q3	42,000 mg/L
2008Q2	27,000 mg/L
2008Q1	27,000 mg/L

## P-14R

2012Q3	23,640 mg/L
2012Q1	22,260 mg/L
2011Q4	22,280 mg/L
2011Q3	22,660 mg/L
2011Q2	18,300 mg/L
2011Q1	21,300 mg/L
2010Q4	21,900 mg/L
2010Q3	22,600 mg/L

## P-14AR (continued)

2010Q2	18,000 mg/L
2010Q1	21,000 mg/L
2009Q4	19,000 mg/L
2009Q3	15,000 mg/L
2009Q2	20,000 mg/L
2009Q1	22,000 mg/L
2008Q4	18,000 mg/L
2008Q3	19,000 mg/L
2008Q2	20,000 mg/L
2008Q1	22,000 mg/L

## P-15AR

2012Q3	9740 mg/L
2012Q1	5976 mg/L
2011Q4	10,150 mg/L
2011Q3	10,170 mg/L
2011Q2	8620 mg/L
2011Q1	9920 mg/L
2010Q4	7980 mg/L
2010Q3	9630 mg/L
2010Q2	10,000 mg/L
2010Q1	9700 mg/L
2009Q4	9300 mg/L
2009Q3	8100 mg/L
2009Q2	11,000 mg/L
2009Q1	10,000 mg/L
2008Q4	10,000 mg/L
2008Q3	12,000 mg/L
2008Q2	11,000 mg/L
2008Q1	13,000 mg/L

## P-17A

2012Q3	70,800 mg/L
2012Q1	66,300 mg/L
2011Q4	62,800 mg/L
2011Q3	66,800 mg/L
2011Q2	53,800 mg/L
2011Q1	63,500 mg/L
2010Q4	67,400 mg/L
2010Q3	208,000 mg/L
2010Q2	65,000 mg/L
2010Q1	68,000 mg/L
2009Q4	53,000 mg/L
2009Q3	54,000 mg/L
2009Q2	56,000 mg/L

## P-17A (continued)

2009Q1	61,000 mg/L
2008Q4	70,000 mg/L
2008Q3	57,000 mg/L
2008Q2	53,000 mg/L
2008Q1	51,000 mg/L

## P-17B

2012Q3	96,800 mg/L
2012Q1	93,000 mg/L
2011Q4	89,200 mg/L
2011Q3	92,200 mg/L
2011Q2	81,500 mg/L
2011Q1	83,900 mg/L
2010Q4	86,300 mg/L
2010Q3	56,200 mg/L
2010Q2	77,000 mg/L
2010Q1	80,000 mg/L
2009Q4	62,000 mg/L
2009Q3	81,000 mg/L
2009Q2	82,000 mg/L
2009Q1	82,000 mg/L
2008Q4	82,000 mg/L
2008Q3	78,000 mg/L
2008Q2	76,000 mg/L
2008Q1	76,000 mg/L

## P-18B

2012Q3	10,120 mg/L
2012Q1	9076 mg/L
2011Q4	9440 mg/L
2011Q3	9820 mg/L
2011Q2	8120 mg/L

## P-19AR

2012Q3	6180 mg/L
2012Q1	6236 mg/L
2011Q4	6072 mg/L
2011Q3	6340 mg/L

## P-20A

2012Q3	7320 mg/L
2012Q1	8336 mg/L
2011Q4	6196 mg/L
2011Q3	8710 mg/L

## P-20B

2012Q3	4028 mg/L
2012Q1	4300 mg/L
2011Q4	4008 mg/L
2011Q3	3824 mg/L

## KMW-8R

2012Q3	29,460 mg/L
2012Q1	29,080 mg/L
2011Q4	28,900 mg/L
2011Q2	27,600 mg/L

## P-21

2012Q3	7560 mg/L
2012Q1	7296 mg/L
2011Q4	5436 mg/L
2011Q3	6504 mg/L

## P-22

2012Q3	11,690 mg/L
2012Q1	10,310 mg/L
2011Q4	10,000 mg/L
2011Q3	9640 mg/L

## IMW-16S

2012Q3	4016 mg/L
2012Q1	4136 mg/L
2011Q4	4144 mg/L
2011Q3	4168 mg/L
2011Q2	4230 mg/L

## IMW-14R

2012Q3	5440 mg/L
2012Q1	5372 mg/L
2011Q4	5232 mg/L
2011Q3	5464 mg/L
2011Q2	6260 mg/L

## IMW-15

2012Q1	6688 mg/L
2011Q4	7030 mg/L
2011Q3	8300 mg/L
2011Q2	7940 mg/L

## HM-8

2012Q1	2702 mg/L
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## HM-8 (continued)

2011Q4	2660 mg/L
2011Q3	2860 mg/L
2011Q2	2750 mg/L

## HM-19

2012Q1	2592 mg/L
2011Q4	2628 mg/L
2011Q3	2646 mg/L

## HM-28

2012Q3	2640 mg/L
2012Q1	2636 mg/L
2011Q4	2628 mg/L
2011Q3	2664 mg/L

## HM-31R

2012Q3	3840 mg/L
2012Q1	2590 mg/L

## HM-32R

2012Q3	7680 mg/L
2012Q1	26,420 mg/L
2011Q4	26,980 mg/L
2011Q3	25,420 mg/L

## HM-52R

2012Q3	2664 mg/L
2012Q1	2638 mg/L
2011Q4	2652 mg/L
2011Q3	2600 mg/L

## HM-53

2012Q3	4672 mg/L
2012Q1	5344 mg/L
2011Q4	5352 mg/L
2011Q3	5256 mg/L
2011Q2	5270 mg/L

## HM-54

2012Q3	7000 mg/L
2012Q1	7060 mg/L
2011Q4	7080 mg/L
2011Q3	7040 mg/L
2011Q2	6680 mg/L

## EXHIBIT II TO NOTICE OF INTENT TO SUE

### **A Partial Listing of Exceedances of Federal RCRA and SDWA Standards for Select Contaminants of Concern at Reid Gardner: 2011 (2<sup>nd</sup> Quarter) through 2012**

#### **Explanatory Note to Exhibit II**

This exhibit provides a listing of exceedances of the state-identified contaminants of concern at the Reid Gardner facility that have associated federal MCLs *where such exceedances are not listed in Exhibit I.*

The listing here is for exceedances of select contaminants detected in all wells for the period beginning with the second quarter of 2011 to the present (the period for which the Tribe and Club counted exceedances).

As noted in Exhibit I, state action levels are less stringent than the federal MCL under RCRA for arsenic, chromium, and selenium. Accordingly, *all* exceedances of state action levels denoted in Exhibit I for these contaminants also exceed any associated RCRA MCL standards. Further, the state action levels are less stringent or equal to the SDWA primary or secondary MCL for arsenic, chromium, manganese, selenium, chloride, sulfate, and TDS. Accordingly, again, *all* exceedances of state action levels denoted in Exhibit I for these contaminants of necessity exceed the SDWA standards.

The listing below, accordingly, only identifies *additional* exceedances of the RCRA SDWA MCLs for these contaminants. That is to say, the list includes a result only where a sample's concentration of a particular contaminant of concern exceeds a lower (more stringent) federal MCL and yet remains below the associated higher (more lenient) state action level.

**ARSENIC****RCRA MCL: 0.05****SDWA Primary MCL: 0.01****(\* indicates an exceedance of the SDWA MCL only)**

<b>IMW-2SR</b>		<b>MW-10RR</b>	
2012Q3	0.028 mg/L*	2012Q1	0.047 mg/L*
2012Q1	0.066 mg/L	2011Q4	0.088 mg/L
2011Q4	0.089 mg/L	2011Q3	0.12 mg/L
2011Q3	0.11 mg/L		
<b>IMW-3S</b>		<b>CMW-1D</b>	
2011Q3	0.049 mg/L*	2012Q1	0.047 mg/L*
2011Q2	0.049 mg/L*	2011Q4	0.12 mg/L
		2011Q3	0.10 mg/L
<b>KMW-1M</b>		<b>CMW-1S</b>	
2012Q3	0.022 mg/L*	2012Q3	0.029 mg/L*
2012Q1	0.045 mg/L*	2012Q1	0.13 mg/L
2011Q4	0.041 mg/L*		
2011Q2	0.0150 mg/L*	<b>CMW-3D</b>	
<b>KMW-1S</b>		2012Q1	0.067 mg/L
2011Q2	0.0848 mg/L	2011Q4	0.10 mg/L
		2011Q3	0.064 mg/L
<b>KMW-19</b>		<b>CMW-4D</b>	
2012Q3	0.098 mg/L	2012Q1	0.039 mg/L*
2012Q1	0.053 mg/L	2011Q4	0.024 mg/L*
2011Q4	0.043 mg/L*	2011Q3	0.036 mg/L*
2011Q2	0.0240 mg/L*		
<b>KMW-20</b>		<b>CMW-4S</b>	
2012Q3	0.036 mg/L*	2012Q1	0.037 mg/L*
2012Q1	0.052 mg/L	2011Q4	0.028 mg/L*
2011Q4	0.049 mg/L*	2011Q3	0.027 mg/L*
2011Q3	0.048 mg/L*		
2011Q2	0.0267 mg/L*	<b>CMW-5D</b>	
<b>KMW-11</b>		2012Q3	0.044 mg/L*
2012Q1	0.054 mg/L	2012Q1	0.12 mg/L
2011Q4	0.068 mg/L	2011Q4	0.034 mg/L*
2011Q3	0.067 mg/L	2011Q3	0.047 mg/L*
2011Q2	0.0558 mg/L		
		<b>CMW-6D</b>	
		2012Q1	0.11 mg/L
		2011Q4	0.074 mg/L
		2011Q3	0.049 mg/L*

		2011Q3	0.091 mg/L
CMW-7D			
2011Q3	0.096 mg/L	P-11	
		2012Q3	0.067 mg/L
MW-4		2011Q4	0.025 mg/L*
2012Q3	0.038 mg/L*	2011Q3	0.039 mg/L*
2012Q1	0.11 mg/L	2011Q2	0.0113 mg/L*
2011Q4	0.11 mg/L		
2011Q3	0.069 mg/L	P-12	
2011Q2	0.0459 mg/L*	2012Q3	0.092 mg/L
		2011Q4	0.058 mg/L
MW-8			
2012Q1	0.056 mg/L	P-14R	
2011Q4	0.077 mg/L	2011Q3	0.066 mg/L
2011Q3	0.035 mg/L*		
2011Q2	0.0338 mg/L*	P-18B	
		2012Q3	0.052 mg/L
MW-9		2012Q1	0.087 mg/L
2012Q3	0.084 mg/L	2011Q4	0.12 mg/L
2012Q1	0.096 mg/L	2011Q3	0.092 mg/L
2011Q4	0.10 mg/L	2011Q2	0.0478 mg/L*
2011Q3	0.070 mg/L		
2011Q2	0.0581 mg/L	P-19AR	
		2012Q3	0.094 mg/L
IMW-3S		2011Q3	0.052 mg/L
2012Q1	0.057 mg/L		
2011Q4	0.055 mg/L	P-20A	
		2012Q3	0.12 mg/L
P-1R		2012Q1	0.069 mg/L
2012Q3	0.023 mg/L*	2011Q4	0.11 mg/L
2011Q4	0.050 mg/L	2011Q3	0.11 mg/L
2011Q3	0.046 mg/L*	2011Q2	0.157 mg/L
2011Q2	0.0418 mg/L*		
		P-20B	
P-5R		2012Q3	0.079 mg/L
2012Q3	0.12 mg/L	2011Q3	0.046 mg/L*
		2011Q2	0.0204 mg/L*
P-8R			
2011Q2	0.0233 mg/L*	KMW-8R	
		2012Q3	0.036 mg/L*
P-9R		2012Q1	0.088 mg/L
2011Q4	0.039 mg/L*	2011Q2	0.0217 mg/L*
2011Q3	0.044 mg/L*		
		P-21	
KMW-9		2012Q3	0.070 mg/L
2011Q4	0.071 mg/L	2012Q1	0.066 mg/L



P-22		HM-19	
2012Q3	0.095 mg/L	2012Q3	0.11 mg/L
2012Q1	0.030 mg/L*	2012Q1	0.10 mg/L
2011Q3	0.059 mg/L	2011Q4	0.097 mg/L
		2011Q3	0.068 mg/L
IMW-9R		2011Q2	0.0624 mg/L
2012Q3	0.022 mg/L*		
2012Q1	0.026 mg/L*	HM-24	
2011Q4	0.054 mg/L	2012Q3	0.040 mg/L*
2011Q3	0.042 mg/L*	2012Q1	0.021 mg/L*
2011Q2	0.0176 mg/L*		
		HM-28	
IMW-12.5R		2012Q3	0.049 mg/L*
2011Q3	0.024 mg/L*	2012Q1	0.060 mg/L
2011Q2	0.0140 mg/L*	2011Q4	0.058 mg/L
		2011Q3	0.054 mg/L
IMW-13R		2011Q2	0.0549 mg/L
2012Q1	0.031 mg/L*		
2011Q4	0.030 mg/L*	HM-31R	
2011Q3	0.044 mg/L*	2012Q3	0.048 mg/L*
2011Q2	0.0346 mg/L*	2012Q1	0.033 mg/L*
IMW-14R		HM-33	
2012Q1	0.024 mg/L*	2012Q3	0.033 mg/L*
2011Q4	0.023 mg/L*	2012Q1	0.044 mg/L*
2011Q3	0.11 mg/L	2011Q4	0.05 mg/L
2011Q2	0.0108 mg/L*	2011Q3	0.043 mg/L*
		2011Q2	0.0382 mg/L*
IMW-15			
2011Q4	0.039 mg/L*	HM-52R	
2011Q3	0.034 mg/L*	2012Q3	0.083 mg/L
		2012Q1	0.087 mg/L
HM-8		2011Q4	0.070 mg/L
2012Q3	0.11 mg/L	2011Q3	0.064 mg/L
2012Q1	0.095 mg/L		
2011Q4	0.060 mg/L	HM-54	
2011Q3	0.098 mg/L	2012Q3	0.11 mg/L
2011Q2	0.0529 mg/L	2012Q1	0.12 mg/L
		2011Q4	0.11 mg/L
HM-48		2011Q3	0.095 mg/L
2012Q1	0.059 mg/L	2011Q2	0.0839 mg/L
2011Q4	0.038 mg/L*		
2011Q3	0.033 mg/L*	HM-60	
2011Q2	0.0410 mg/L*	2012Q3	0.032 mg/L*

LMW-2  
2011Q3 0.032 mg/L\*

LMW-4R  
2011Q4 0.027 mg/L\*  
2011Q3 0.022 mg/L\*

LMW-6R  
2011Q4 0.020 mg/L\*  
2011Q3 0.036 mg/L\*

LMW-7  
2011Q3 0.023 mg/L\*

LMW-8R  
2012Q1 0.047 mg/L\*  
2011Q4 0.040 mg/L\*  
2011Q3 0.030 mg/L\*

LMW-9  
2011Q4 0.022 mg/L\*  
2011Q3 0.035 mg/L\*  
2011Q2 0.101 mg/L

KMW-12  
2011Q4 0.051 mg/L  
2011Q3 0.029 mg/L\*  
2011Q2 0.0143 mg/L\*

KMW-16  
2012Q1 0.047 mg/L\*  
2011Q4 0.053 mg/L  
2011Q3 0.066 mg/L  
2011Q2 0.0477 mg/L\*

**CHLORIDE****SDWA Secondary MCL: 250 mg/L**

KMW-19		MW-4	
2012Q3	300 mg/L	2012Q3	320 mg/L
2011Q4	390 mg/L	2011Q4	450 mg/L
2011Q2	368 mg/L	2011Q3	460 mg/L
		2011Q2	504 mg/L
KMW-20		IMW-3D	
2012Q3	390 mg/L	2011Q4	270 mg/L
2011Q4	470 mg/L		
2011Q3	430 mg/L	IMW-3S	
2011Q2	363 mg/L	2011Q4	290 mg/L
KMW-11		P-1R	
2011Q4	260 mg/L	2012Q3	490 mg/L
MW-6		2011Q4	480 mg/L
2012Q3	250 mg/L	2011Q3	450 mg/L
2011Q4	310 mg/L	2011Q2	470 mg/L
2011Q3	250 mg/L		
2011Q2	255 mg/L	P-11	
		2011Q3	510 mg/L
CMW-1D		2011Q2	475 mg/L
2012Q3	470 mg/L		
2011Q4	370 mg/L	P-12	
		2012Q3	480 mg/L
CMW-1S		2011Q2	467 mg/L
2012Q3	480 mg/L		
		P-20A	
CMW-4S		2012Q3	430 mg/L
2011Q4	260 mg/L	2011Q3	520 mg/L
CMW-7D		P-20B	
2011Q4	400 mg/L	2012Q3	450 mg/L
		2011Q4	430 mg/L
CMW-7S		2011Q3	390 mg/L
2012Q3	460 mg/L	2011Q2	392 mg/L
MW-1R		IMW-16S	
2011Q4	300 mg/L	2012Q3	460 mg/L
2011Q3	290 mg/L	2011Q3	470 mg/L
2011Q2	276 mg/L	2011Q2	450 mg/L

IMW-9R		LMW-5R	
2012Q3	290 mg/L	2012Q3	440 mg/L
2011Q2	280 mg/L		
		LMW-7	
HM-8		2011Q3	310 mg/L
2012Q3	260 mg/L		
2011Q4	400 mg/L	LMW-9	
2011Q3	420 mg/L	2012Q3	360 mg/L
		2012Q1	370 mg/L
HM-19		2011Q4	370 mg/L
2011Q3	250 mg/L	2011Q3	380 mg/L
2011Q2	291 mg/L	2011Q2	359 mg/L
HM-24		KMW-12	
2011Q4	260 mg/L	2012Q3	400 mg/L
2011Q3	270 mg/L	2012Q1	380 mg/L
2011Q2	255 mg/L	2011Q4	390 mg/L
		2011Q3	380 mg/L
HM-28		2011Q2	377 mg/L
2012Q3	290 mg/L		
2011Q3	290 mg/L		
2011Q2	278 mg/L		
HM-31R			
2012Q3	400 mg/L		
HM-32R			
2012Q3	370 mg/L		
HM-52R			
2012Q3	250 mg/L		
2011Q4	260 mg/L		
2011Q3	270 mg/L		
HM-53			
2012Q3	440 mg/L		
2011Q4	430 mg/L		
2011Q3	420 mg/L		
2011Q2	437 mg/L		
LMW-2			
2012Q3	480 mg/L		
LMW-4R			
2012Q3	490 mg/L		

**CHROMIUM**

**RCRA MCL: 0.05 mg/L**

LMW-9  
2012Q3           0.087 mg/L

KMW-11  
2012Q1           0.082 mg/L  
2011Q4           0.085 mg/L  
2011Q3           0.098 mg/L  
2011Q2           0.0907 mg/L

HM-19  
2011Q3           0.091 mg/L

**MANGANESE****SDWA Secondary MCL: 0.05 mg/L**

KMW-1D		CMW-5D	
2012Q3	0.074 mg/L	2011Q4	0.079 mg/L
2012Q1	0.071 mg/L	2011Q3	0.068 mg/L
2011Q4	0.074 mg/L		
		CMW-6D	
KMW-1S		2011Q3	0.15 mg/L
2012Q3	0.16 mg/L		
2012Q1	0.059 mg/L	CMW-6S	
2011Q2	0.100 mg/L	2012Q3	0.21 mg/L
		2011Q4	0.20 mg/L
KMW-15		2011Q3	0.24 mg/L
2011Q3	0.096 mg/L		
		CMW-7D	
MW-6		2012Q3	0.14 mg/L
2012Q3	0.14 mg/L	2012Q1	0.14 mg/L
2012Q1	0.11 mg/L	2011Q4	0.11 mg/L
2011Q4	0.17 mg/L		
2011Q3	0.17 mg/L	MW-1R	
2011Q2	0.0845 mg/L	2012Q3	0.15 mg/L
		2012Q1	0.18 mg/L
CMW-1D		2011Q4	0.19 mg/L
2012Q3	0.23 mg/L	2011Q3	0.19 mg/L
2012Q1	0.21 mg/L	2011Q2	0.179 mg/L
CMW-2D		MW-4	
2012Q3	0.20 mg/L	2012Q3	0.14 mg/L
2012Q1	0.14 mg/L	2012Q1	0.14 mg/L
2011Q4	0.060 mg/L	2011Q4	0.26 mg/L
		2011Q2	0.170 mg/L
CMW-2S			
2012Q3	0.050 mg/L	MW-8	
2011Q4	0.054 mg/L	2012Q3	0.22 mg/L
		2012Q1	0.23 mg/L
CMW-3D		2011Q4	0.22 mg/L
2011Q4	0.26 mg/L	2011Q3	0.20 mg/L
		2011Q2	0.211 mg/L
CMW-3S			
2012Q3	0.13 mg/L	P-9	
2012Q1	0.15 mg/L	2012Q1	0.20 mg/L
2011Q4	0.12 mg/L	2011Q4	0.20 mg/L
2011Q3	0.15 mg/L	2011Q3	0.12 mg/L

P-9R		HM-48	
2011Q3	0.25 mg/L	2012Q1	0.064 mg/L
		2011Q4	0.070 mg/L
P-12R		HM-19	
2011Q2	0.0662 mg/L	2012Q3	0.20 mg/L
P-15AR		2012Q1	0.26 mg/L
2012Q3	0.13 mg/L	2011Q4	0.25 mg/L
2012Q1	0.13 mg/L	2011Q3	0.12 mg/L
2011Q4	0.19 mg/L		
2011Q3	0.15 mg/L	HM-31R	
2011Q2	0.206 mg/L	2012Q3	0.081 mg/L
		2011Q3	0.11 mg/L
P-18B		HM-32R	
2011Q3	0.052 mg/L	2012Q1	0.19 mg/L
P-20A		HM-53	
2012Q3	0.058 mg/L	2012Q3	0.13 mg/L
P-20B		2012Q1	0.096 mg/L
2011Q3	0.18 mg/L	2011Q4	0.10 mg/L
2011Q2	0.126 mg/L	2011Q3	0.086 mg/L
		2011Q2	0.0861 mg/L
P-21		HM-54	
2012Q3	0.25 mg/L	2012Q3	0.26 mg/L
2012Q1	0.18 mg/L	2011Q4	0.25 mg/L
IMW-15		2011Q3	0.24 mg/L
2011Q2	0.160 mg/L	2011Q2	0.149 mg/L
IMW-16S		HM-60	
2012Q3	0.16 mg/L	2012Q3	0.12 mg/L
2012Q1	0.16 mg/L		
2011Q4	0.20 mg/L	LMW-8R	
2011Q3	0.16 mg/L	2012Q3	0.072 mg/L
2011Q2	0.163 mg/L	2012Q1	0.097 mg/L
		2011Q4	0.14 mg/L
HM-8		2011Q3	0.13 mg/L
2012Q3	0.067 mg/L		
2012Q1	0.069 mg/L		
2011Q4	0.082 mg/L		
2011Q3	0.085 mg/L		
2011Q2	0.0663 mg/L		

**SELENIUM****RCRA MCL: 0.01 mg/L**

IMW-2D		CMW-2D	
2012Q1	0.024 mg/L	2012Q1	0.027 mg/L
2011Q4	0.020 mg/L		
		CMW-3D	
IMW-2SR		2012Q1	0.025 mg/L
2012Q1	0.023 mg/L		
2011Q4	0.024 mg/L	CMW-4S	
2011Q3	0.036 mg/L	2012Q1	0.028 mg/L
KMW-1M		CMW-5D	
2012Q1	0.029 mg/L	2012Q1	0.030 mg/L
2011Q4	0.021 mg/L		
		CMW-6D	
KMW-1S		2012Q1	0.039 mg/L
2012Q1	0.030 mg/L	2011Q3	0.032 mg/L
KMW-19		MW-4	
2011Q4	0.030 mg/L	2012Q1	0.046 mg/L
		2011Q3	0.027 mg/L
KMW-20		MW-5	
2012Q1	0.022 mg/L	2011Q3	0.022 mg/L
2011Q3	0.027 mg/L		
KMW-11		MW-8	
2012Q1	0.024 mg/L	2012Q1	0.030 mg/L
2011Q4	0.022 mg/L		
2011Q3	0.037 mg/L	MW-9	
		2012Q1	0.041 mg/L
MW-10RR		P-2	
2012Q1	0.046 mg/L	2012Q1	0.034 mg/L
2011Q3	0.020 mg/L	2011Q4	0.035 mg/L
MW-2R		P-4	
2012Q1	0.028 mg/L	2012Q1	0.035 mg/L
2011Q4	0.026 mg/L		
MW-3RR		P-5R	
2012Q1	0.037 mg/L	2012Q1	0.027 mg/L
2011Q4	0.021 mg/L	2011Q4	0.047 mg/L
MW-6		P-7R	
2012Q1	0.023 mg/L	2012Q1	0.046 mg/L



P-8R		2011Q3	0.027 mg/L
2012Q1	0.026 mg/L	KMW-8R	
		2012Q1	0.029 mg/L
		2011Q4	0.027 mg/L
KMW-9			
2012Q1	0.020 mg/L	P-20A	
2011Q4	0.049 mg/L	2011Q3	0.021 mg/L
		2011Q2	0.0335 mg/L
P-10			
2011Q4	0.023 mg/L	P-20B	
2011Q3	0.034 mg/L	2011Q3	0.023 mg/L
P-11		P-21	
2012Q3	0.025 mg/L	2012Q1	0.021 mg/L
2012Q1	0.044 mg/L	2011Q3	0.031 mg/L
2011Q4	0.043 mg/L		
2011Q3	0.047 mg/L	P-22	
2011Q2	0.0286 mg/L	2011Q4	0.042 mg/L
		2011Q3	0.021 mg/L
P-12			
2012Q3	0.039 mg/L	IMW-16S	
2012Q1	0.046 mg/L	2012Q1	0.020 mg/L
2011Q4	0.037 mg/L	2011Q4	0.026 mg/L
P-13R		IMW-9R	
2012Q1	0.026 mg/L	2012Q1	0.021 mg/L
2011Q3	0.023 mg/L	2011Q3	0.021 mg/L
P-14R		IMW-13R	
2012Q1	0.020 mg/L	2012Q1	0.020 mg/L
2011Q4	0.024 mg/L	2011Q3	0.030 mg/L
2011Q3	0.022 mg/L		
		IMW-14R	
P-15AR		2012Q3	0.034 mg/L
2012Q1	0.030 mg/L	2011Q4	0.026 mg/L
		2011Q3	0.032 mg/L
P-17A		2011Q2	0.0426 mg/L
2012Q1	0.046 mg/L		
2011Q3	0.024 mg/L	IMW-15	
		2012Q1	0.042 mg/L
P-17B		2011Q2	0.0442 mg/L
2012Q1	0.034 mg/L		
2011Q3	0.029 mg/L	IMW-17	
		2012Q1	0.021 mg/L
P-19AR			
2011Q4	0.028 mg/L		

HM-19		LMW-6R	
2012Q3	0.022 mg/L	2012Q1	0.027 mg/L
2012Q1	0.022 mg/L	2011Q4	0.047 mg/L
HM-24		LMW-7	
2012Q1	0.024 mg/L	2011Q3	0.032 mg/L
HM-28		LMW-9	
2012Q1	0.024 mg/L	2011Q3	0.044 mg/L
2011Q3	0.021 mg/L	2011Q2	0.0222 mg/L
HM-32R		KMW-12	
2012Q3	0.029 mg/L	2012Q1	0.025 mg/L
2011Q3	0.027 mg/L	2011Q3	0.034 mg/L
HM-33		KMW-16	
2012Q3	0.026 mg/L	2011Q3	0.038 mg/L
2012Q1	0.026 mg/L	2011Q2	0.0190 mg/L
2011Q3	0.024 mg/L		
HM-52R			
2012Q3	0.022 mg/L		
HM-53			
2012Q1	0.021 mg/L		
HM-60			
2012Q3	0.023 mg/L		
LMW-2			
2011Q3	0.036 mg/L		
2011Q2	0.0173 mg/L		
LMW-3			
2011Q4	0.028 mg/L		
LMW-4R			
2012Q1	0.039 mg/L		
2011Q4	0.045 mg/L		
2011Q3	0.039 mg/L		
LMW-5R			
2011Q3	0.029 mg/L		

**SULFATE****SDWA Secondary MCL: 250 mg/L**

IMW-2D		IMW-9R	
2011Q4	1000 mg/L	2012Q3	820 mg/L
2011Q2	970 mg/L	2012Q1	940 mg/L
		2011Q3	940 mg/L
IMW-3S		2011Q2	832 mg/L
2011Q3	760 mg/L		
2011Q2	673 mg/L	IMW-13R	
		2012Q3	310 mg/L
IMW-3D		2012Q1	480 mg/L
2011Q2	660 mg/L		
		IMW-17	
KMW-1D		2012Q3	810 mg/L
2012Q3	950 mg/L	2012Q1	860 mg/L
2011Q4	980 mg/L	2011Q4	950 mg/L
2011Q2	901 mg/L	2011Q3	940 mg/L
		2011Q2	555 mg/L
MW-6			
2012Q3	800 mg/L	HM-8	
2012Q1	860 mg/L	2012Q3	700 mg/L
2011Q4	880 mg/L	2012Q1	710 mg/L
2011Q3	820 mg/L	2011Q4	590 mg/L
2011Q2	804 mg/L	2011Q3	460 mg/L
		2011Q2	390 mg/L
CMW-4D			
2012Q3	670 mg/L	HM-48	
2012Q1	750 mg/L	2012Q1	790 mg/L
2011Q4	700 mg/L	2011Q4	810 mg/L
2011Q3	680 mg/L	2011Q3	800 mg/L
		2011Q2	720 mg/L
CMW-4S			
2012Q3	710 mg/L	HM-24	
2012Q1	730 mg/L	2012Q3	710 mg/L
2011Q4	680 mg/L	2012Q1	820 mg/L
2011Q3	660 mg/L	2011Q4	760 mg/L
		2011Q3	800 mg/L
IMW-3D		2011Q2	787 mg/L
2012Q1	760 mg/L		
2011Q4	710 mg/L	HM-31R	
		2012Q1	640 mg/L
IMW-3S			
2012Q1	770 mg/L		
2011Q4	750 mg/L		

HM-33	
2012Q3	900 mg/L
2012Q1	990 mg/L
2011Q4	890 mg/L
2011Q3	1000 mg/L
2011Q2	890 mg/L

HM-60	
2012Q3	800 mg/L

**TOTAL DISSOLVED SOLIDS****SDWA Secondary MCL: 500 mg/L**

IMW-2D		IMW-3S	
2012Q3	1662 mg/L	2012Q1	1824 mg/L
2012Q1	1656 mg/L	2011Q4	1856 mg/L
2011Q4	1666 mg/L	2011Q3	1902 mg/L
2011Q2	1730 mg/L		
		IMW-9R	
IMW-3D		2012Q3	2060 mg/L
2011Q2	1680 mg/L	2012Q1	2096 mg/L
		2011Q4	2050 mg/L
IMW-3S		2011Q3	2172 mg/L
2011Q2	1840 mg/L	2011Q2	2130 mg/L
KMW-1D		IMW-12.5R	
2012Q3	1682 mg/L	2012Q3	712 mg/L
2012Q1	1718 mg/L	2012Q1	679 mg/L
2011Q4	1802 mg/L	2011Q4	667 mg/L
2011Q2	1720 mg/L	2011Q2	716 mg/L
MW-6		IMW-13R	
2012Q3	2010 mg/L	2012Q3	876 mg/L
2011Q4	2082 mg/L	2012Q1	1045 mg/L
2011Q3	2052 mg/L	2011Q4	1251 mg/L
2011Q2	2100 mg/L	2011Q3	2494 mg/L
		2011Q2	2070 mg/L
CMW-4D		IMW-17	
2012Q3	1476 mg/L	2012Q3	1752 mg/L
2012Q1	1531 mg/L	2012Q1	1720 mg/L
2011Q4	1454 mg/L	2011Q4	1922 mg/L
2011Q3	1492 mg/L	2011Q3	1886 mg/L
		2011Q2	1520 mg/L
CMW-4S			
2012Q3	1718 mg/L	HM-8	
2012Q1	1618 mg/L	2012Q3	2556 mg/L
2011Q4	1574 mg/L		
2011Q3	1590 mg/L	HM-48	
		2012Q1	2064 mg/L
IMW-3D		2011Q4	1642 mg/L
2012Q1	1696 mg/L	2011Q3	1682 mg/L
2011Q4	1674 mg/L	2011Q2	2260 mg/L

HM-19  
2012Q3 2566 mg/L  
2011Q2 2480 mg/L

HM-24  
2012Q3 2474 mg/L  
2012Q1 2450 mg/L  
2011Q4 2432 mg/L  
2011Q3 2456 mg/L  
2011Q2 2360 mg/L

HM-28  
2011Q2 2510 mg/L

HM-31R  
2011Q4 2212 mg/L  
2011Q3 2180 mg/L  
2011Q2 2460 mg/L

HM-33  
2012Q3 2102 mg/L  
2012Q1 1984 mg/L  
2011Q4 1812 mg/L  
2011Q3 2086 mg/L  
2011Q2 2010 mg/L

HM-60  
2012Q3 1810 mg/L

KMW-11  
2011Q3 2556 mg/L

KMW-16  
2012Q3 2090 mg/L  
2011Q3 2064 mg/L  
2011Q2 2230 mg/L

LMW-7  
2011Q3 2378 mg/L