

**2021 ANNUAL GROUNDWATER MONITORING
AND CORRECTIVE ACTION REPORT
MERRIMACK STATION COAL ASH LANDFILL**

Bow, New Hampshire

*Prepared for GSP Merrimack LLC
File No. 2025.10
January 2021*

Mr. Allan Palmer
GSP Merrimack LLC
431 River Road
Bow, New Hampshire 03304

January 21, 2021
File No. 2025.10

Re: 2021 Annual Groundwater Monitoring and Corrective Action Report
Merrimack Station Coal Ash Landfill
Bow, New Hampshire

Dear Allan:

Groundwater monitoring at the Merrimack Station Coal Ash Landfill site (Site) in Bow, New Hampshire is required pursuant to 40 CFR Part 257.90. Sanborn, Head & Associates, Inc. (Sanborn Head) prepared this 2021 Annual Groundwater Monitoring and Corrective Action Report (Annual Report) for the Site as required by 40 CFR Part 257.90(e), and this Annual Report covers the reporting period from January 1, 2020 through December 31, 2020. This report and the services provided by Sanborn Head are subject to the Limitations provided in Attachment A.

GROUNDWATER MONITORING AND CORRECTIVE ACTIONS OVERVIEW

As required under 40 CFR Part 257.90(e)(6), the following summarizes the groundwater monitoring and corrective action programs for the 2020 annual reporting period.

- (i) The Site was operating under the detection monitoring program at the start of the annual reporting period.
- (ii) The Site was operating under the detection monitoring program at the end of the annual reporting period, i.e., there was no need to implement assessment monitoring.
- (iii) There were no determinations of statistically significant increases over background.
- (iv) There were no determinations of statistically significant exceedances of groundwater protection standards.
- (v) There were no remedy selections required pursuant to 40 CFR Part 257.97.
- (vi) There were no initiated or ongoing remedial activities required pursuant to 40 CFR Part 257.98.

REPORT REQUIREMENTS

As required under 40 CFR Part 257.90(e), this Annual Report includes the following information:

1. A map, aerial image, or diagram showing the Site and the background (or upgradient) and downgradient monitoring wells that are part of the groundwater monitoring program for the Site;
2. Identification of monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;
3. Monitoring data obtained under 40 CFR Parts 257.90 through 257.98, including:
 - a. the number of groundwater samples that were collected for analysis for each background and downgradient well;
 - b. the dates the samples were collected; and
 - c. whether the sample was required by the detection monitoring or assessment monitoring programs;
4. A narrative discussion of transitions, if any, between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels);
5. Other information required to be included in the annual report as specified in 40 CFR Parts 257.90 through 257.98, including:
 - a. Groundwater elevations measured in each well immediately prior to purging and the rate and direction of groundwater flow, as calculated by the owner or operator of the Site, each time groundwater is sampled (40 CFR Part 257.93(c)); and
 - b. Written demonstrations prepared by a qualified professional engineer demonstrating that a source other than the Site caused the statistically significant increase (SSI) over background levels for a constituent or that the SSI resulted from an error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality (40 CFR Part 257.94(e)(2));
6. As provided in the groundwater monitoring and corrective actions overview above, a section at the beginning of the annual report that provides an overview of the current status of groundwater monitoring and corrective action programs for the Site.

BACKGROUND

The Site has been operating since 1978 and was constructed in a former sand and gravel quarry on the property adjacent to the Merrimack Station electric power generation facility in Bow, New Hampshire. The landfill was constructed with a Hypalon geomembrane liner system and a leachate collection system, and it receives coal ash from the nearby Merrimack Station electric power generation facility. A portion of the landfill was filled to final grade and was capped with a final cover system. A Locus Plan for the Site is provided as Figure 1,

and the locations of the monitoring wells in relation to the landfill are indicated on the Facility Plan, Figure 2.

The groundwater quality at the Site has been routinely monitored since the 1980s under New Hampshire Department of Environmental Services (NHDES) regulations. The current groundwater monitoring program, as prescribed by the NHDES Groundwater Release Detection Permit No. GWP-198400065-B-006, dated March 16, 2017, requires measuring of static groundwater levels and laboratory analyses of groundwater samples from five (5) overburden monitoring wells (i.e., SB-1, SB-4, SB-6, SB-13, and SB-14) on a semi-annual basis.

As discussed in the Groundwater Monitoring Well Network Verification (Sanborn Head, January 14, 2016, available in the Site's operating record), the five monitoring wells were certified as an appropriate groundwater monitoring system and were constructed to meet the requirements of 40 CFR Part 257.91. No monitoring wells were installed or decommissioned at the Site during the reporting period.

SUMMARY OF GROUNDWATER MONITORING

As specified in 40 CFR Part 257.94(b), a detection monitoring program was initiated in October 2015. A Sampling and Analysis Plan (Sanborn Head, last revised on October 7, 2016) was prepared to address the sampling and analysis requirements of 40 CFR part 257.93. Monitoring well SB-13 is the upgradient/background monitoring well for the Site. The other monitoring wells are considered downgradient or sidegradient to the landfill, although groundwater flow conditions at the Site vary over time. For the groundwater monitoring program, unfiltered groundwater samples were collected and analyzed by Eastern Analytical, Inc. (EAI) of Concord, New Hampshire using low-flow sampling techniques, based on the U.S. Environmental Protection Agency (USEPA) Low Stress (Low Flow) Standard Operating Procedure, revised January 19, 2010.

As part of the detection monitoring program, eight independent samples for each background and downgradient well were collected and analyzed for the constituents listed in 40 CFR Part 257 Appendix III (boron, calcium, chloride, fluoride, pH, sulfate, and total dissolved solids) and Appendix IV (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, fluoride, lead, lithium, mercury, molybdenum, selenium, thallium, and radium 226 and 228 combined). The initial eight, independent samples were collected in February 2016 through April 2017 for the five Site monitoring wells. The statistical analysis of the groundwater monitoring data after the eight initial samples indicated that a transition between monitoring programs (i.e., to assessment monitoring) was not required.

Semi-annual detection monitoring, as specified in 40 CFR Part 257.94, was initiated in November 2017. Detection monitoring at the Site includes sampling the five wells for analysis of the Appendix III constituents. For the current reporting period, the semi-annual detection monitoring rounds were in April 2020 and November 2020. Additional samples were collected on February 14, 2020 as part of a resampling routine for the November 2019 monitoring round and July 8, 2020 as part of a resampling routine for the April 2020 monitoring round. As described below, the data analyses completed during the reporting

period indicated that a transition between monitoring programs (i.e., to assessment monitoring) was not required.

Groundwater analytical data are summarized in Table 1 and analytical laboratory reports are provided in Attachment B. The groundwater level measurements and inferred general groundwater flow directions are summarized in Table 2.

SUMMARY OF STATISTICAL ANALYSIS

As required under 40 CFR Part 257.90(b)(iv), Sanborn Head evaluated groundwater monitoring data for a statistically significant increase (SSI) over background levels for the constituents listed in 40 CFR Part 257 Appendix III at the five Site monitoring wells. On May 4, 2018, Sanborn Head issued a Statistical Method Selection Certification, applicable to the statistical analysis completed on the groundwater analytical data collected through July 8, 2020. The certification is available in the Site's operating record. Statistical analysis of the November 2020 data is ongoing.

The prediction interval procedure specified in 40 CFR Part 257.93(f)(3) was selected for evaluation of the most recent parameter values for the site wells (i.e., SB-1, SB-4, SB-6, SB-13, and SB-14). The prediction interval procedure was performed on parameters specified in Appendix III (i.e., boron, calcium, chloride, fluoride, pH, Sulfate, and total dissolved solids) using the multiple well and multiple parameter prediction limit equation. There were no determinations of statistically significant increases over background for data collected in 2020.

Data for the November 2020 groundwater detection monitoring round are included in Table 1; however, the statistical analysis for the November 2020 data is on-going. As stipulated in 40 CFR Part 257.93(h)(2), the Site operator has 90 days from completing the sampling and analysis to identify whether there is an SSI over background. The laboratory analyses were received November 30, 2020, and the statistical analysis is due by February 28, 2021.

CLOSING

We understand that GSP Merrimack LLC will be responsible for placing this Annual Report in the Site's operating record by January 31, 2021. The next Annual Report will be due January 31, 2022 for the time period from January 1, 2021 through December 31, 2021.

Sincerely,
SANBORN, HEAD & ASSOCIATES, INC.



Harrison R. Roakes, PE
Project Manager



Eric S. Steinhauser, PE, CPESC, CPSWQ
Senior Vice President

HRR/ESS: hrr

Enclosures: Table 1 Groundwater Analytical Results Summary
Table 2 Groundwater Level Measurements Summary

Figure 1 Locus Plan
Figure 2 Facility Plan

Attachment A Limitations
Attachment B Analytical Laboratory Reports

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TABLES

**TABLE 1
Groundwater Analytical Results Summary
Merrimack Station Coal Ash Landfill
Bow, New Hampshire**

Location	Date	Metals																						
		µg/L																		s.u		pCi/L		
		Antimony	Arsenic	Barium	Beryllium	Boron	Cadmium	Calcium	Chromium	Cobalt	Lead	Lithium	Mercury	Molybdenum	Selenium	Thallium	Chloride	Fluoride	Sulfate	Total Dissolved Solids	pH	Radium 226	Radium 228	Radium 226+228
Drinking Water MCL		6	10	2,000	4	NS	5	NS	100	NS	15*	NS	2	NS	50	2	NS	4,000	NS	NS	NS	NS	5	
CCR Alt. Standards		NA	NA	NA	NA	NA	NA	NA	NA	6	15	40	NA	100	NA	NA	NA	NA	NA	NA	NA	NA	NA	
GW-1/(AGQS)		6 ‡	10 ‡	2,000 ‡	4 ‡	6,000 ‡	5 ‡	NS ‡	100	NS ‡	15 ‡	NS	2 ‡	NS	50 ‡	2 ‡	NS	4,000	500,000	NS	NS	NS	NS	
GW-2		NA	NA	NA	NA	NA	NA	NS	NA	NS	NA	NS	NA	NS	NA	NA	NS	†	†	NS	NS	NS	NS	
SB-1	2/24/2016	<1.0	<1.0	14	<1.0	60	<1.0	7,200	<1.0	<1.0	<1.0	<1,000	<0.10	<1.0	<1.0	<1.0	44,000	<100	8,000	96,000	5.21	0.2 ±0.1	0.6 ±0.6	0.8 ±0.6
	4/25/2016	<1.0	<1.0	18	<1.0	100	<1.0	10,000	<1.0	<1.0	<1.0	<100	<0.10	1.0	<1.0	<1.0	58,000	<100	9,000	120,000	5.72	0.5 ±0.2	0.2 ±0.4	0.7 ±0.4
	6/6/2016	<1.0	<1.0	16	<1.0	<50	<1.0	8,200	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	55,000	<100	7,000	140,000	5.52	0.6 ±0.3	0.2 ±0.5	0.8 ±0.5
	7/18/2016	<1.0	<1.0	16	<1.0	70	<1.0	8,600	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	60,000	<100	9,000	120,000	5.35	0.4 ±0.3	0.0 ±0.6	0.4 ±0.6
	8/30/2016	<1.0	<1.0	17	<1.0	<50	<1.0	7,900	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	49,000	<100	7,000	120,000	5.23	0.4 ±0.3	0.3 ±0.4	0.7 ±0.4
	10/17/2016	<1.0	<1.0	17	<1.0	<50	<1.0	9,700	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	60,000	<100	6,000	130,000	5.63	0.6 ±0.4	0.0 ±0.4	0.6 ±0.4
	11/29/2016	<1.0	<1.0	16	<1.0	<50	<1.0	8,000	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	62,000	<100	6,000	88,000	5.63	1.0 ±0.4	0.8 ±0.5	1.8 ±0.5
	4/19/2017	<1.0	<1.0	16	<1.0	<50	<1.0	10,000	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	56,000	<100	8,000	120,000	5.81	0.4 ±0.3	0.2 ±0.5	0.6 ±0.5
	11/17/2017					50		12,000									68,000	<100	8,000	120,000	5.70			
	1/31/2018 e							12,000																
	4/9/2018					67		12,000									55,000	<100	10,000	160,000	5.90			
	7/25/2018 e							12,000									63,000		13,000	140,000	5.94			
	11/29/2018					87		13,000									66,000	<100	10,000	100,000	6.07			
	4/26/2019					100		13,000									55,000	<100	12,000	140,000	5.78			
	11/15/2019					59		11,000									68,000	<100	10,000	140,000	5.56			
4/23/2020					70		14,000									53,000	<100	11,000	150,000	5.94				
11/12/2020					<50		10,000									64,000	<100	13,000	150,000	5.36				
SB-4	2/23/2016	<1.0	<1.0	14	<1.0	<50	<1.0	8,400	<1.0	<1.0	<1.0	<1,000	<0.10	<1.0	<1.0	<1.0	95,000	<100	9,000	210,000	5.49	0.3 ±0.1	1.0 ±0.6	1.3 ±0.6
	4/25/2016	<1.0	<1.0	14	<1.0	<50	<1.0	9,300	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	110,000	<100	8,000	200,000	5.32	0.3 ±0.3	0.0 ±0.4	0.3 ±0.4
	6/6/2016	<1.0	<1.0	12	<1.0	<50	<1.0	8,000	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	110,000	<100	10,000	230,000	5.62	0.2 ±0.2	0.4 ±0.5	0.6 ±0.5
	7/18/2016	<1.0	<1.0	11	<1.0	<50	<1.0	7,800	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	100,000	<100	11,000	220,000	5.27	0.4 ±0.3	0.4 ±0.6	0.8 ±0.6
	8/30/2016	<1.0	<1.0	10	<1.0	<50	<1.0	6,800	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	88,000	<100	12,000	210,000	5.72	0.2 ±0.2	0.0 ±0.4	0.2 ±0.4
	10/17/2016	<1.0	<1.0	12	<1.0	<50	<1.0	8,400	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	100,000	<100	10,000	190,000	5.71	0.3 ±0.3	0.0 ±0.5	0.3 ±0.5
	11/29/2016	<1.0	1.0	12	<1.0	<50	<1.0	7,000	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	100,000	<100	10,000	180,000	5.79	0.7 ±0.3	0.5 ±0.5	1.2 ±0.5
	4/19/2017	<1.0	<1.0	19	<1.0	<50	<1.0	10,000	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	120,000	<100	9,000	260,000	5.71	0.3 ±0.3	0.0 ±0.5	0.3 ±0.5
	11/17/2017					<50		10,000									77,000	<100	13,000	170,000	5.80			
	4/9/2018					<50		11,000									93,000	<100	12,000	220,000	5.87			
	7/25/2018 e							9,800									95,000		11,000	210,000	5.68			
	11/28/2018					<50		12,000									86,000	<100	13,000	83,000	6.28			
	4/26/2019					<50		13,000									94,000	<100	11,000	190,000	5.83			
	11/15/2019					53		11,000									97,000	<100	11,000	230,000	5.75			
	2/14/2020 e					<50		11,000									100,000		14,000	190,000	5.85			
4/23/2020					55		13,000									140,000	<100	11,000	260,000	5.72				
7/8/2020					57		11,000									99,000		14,000	240,000	5.59				
11/12/2020					60		9,600									120,000	<100	18,000	260,000	5.18				
SB-6	2/23/2016	<1.0	<1.0	9.0	<1.0	<50	<1.0	5,300	<1.0	<1.0	<1.0	<1,000	<0.10	<1.0	<1.0	<1.0	80,000	<100	10,000	170,000	5.55	0.1 ±0.07	0.5 ±0.5	0.6 ±0.5
	4/25/2016	<1.0	<1.0	16	<1.0	<50	<1.0	9,300	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	140,000	<100	7,000	220,000	5.55	0.4 ±0.3	0.0 ±0.4	0.4 ±0.4
	6/6/2016	<1.0	<1.0	17	<1.0	<50	<1.0	9,300	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	140,000	<100	8,000	270,000	5.40	0.5 ±0.3	0.0 ±0.5	0.5 ±0.5
	7/18/2016	<1.0	<1.0	17	<1.0	<50	<1.0	9,200	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	140,000	<100	9,000	260,000	5.27	0.5 ±0.3	0.3 ±0.6	0.8 ±0.6
	8/30/2016	<1.0	<1.0	18	<1.0	<50	<1.0	9,100	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	140,000	<100	9,000	280,000	5.71	0.4 ±0.2	0.0 ±0.4	0.4 ±0.4
	10/17/2016	<1.0	<1.0	18	<1.0	<50	<1.0	10,000	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	150,000	<100	8,000	260,000	5.78	0.2 ±0.3	0.0 ±0.5	0.2 ±0.5
	11/29/2016	<1.0	<1.0	16	<1.0	<50	<1.0	8,100	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	130,000	<100	9,000	230,000	5.77	0.5 ±0.2	0.8 ±0.5	1.3 ±0.5
	4/19/2017	<1.0	<1.0	13	<1.1	<51	<1.1	7,400	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	100,000	<100	9,000	190,000	5.68	0.4 ±0.3	0.2 ±0.5	0.6 ±0.5
	11/17/2017					<50		9,900									130,000	<100	11,000	230,000	5.60			
	4/9/2018					<50		7,900									120,000	<100	9,500	240,000	5.57			
	7/25/2018 e							11,000									180,000		12,000	310,000	5.44			
	11/28/2018					<50		11,000									150,000	<100	11,000	140,000	5.86			
	4/26/2019					84		13,000									150,000	<100	14,000	210,000	5.78			
	7/11/2019 e					80		14,000									170,000		15,000	330,000	5.84			
	11/15/2019					52		10,000									140,000	<100	13,000	280,000	5.75			
2/14/2020 e					<50		5,100									79,000		15,000	130,000	5.73				
4/23/2020					<50		12,000									160,000	<100	8,100	270,000	5.56				
11/12/2020					<50		12,000									180,000	<100	9,600	330,000	5.37				

**TABLE 1
Groundwater Analytical Results Summary
Merrimack Station Coal Ash Landfill
Bow, New Hampshire**

Location	Date	Metals																						
		µg/L																		s.u		pCi/L		
		Antimony	Arsenic	Barium	Beryllium	Boron	Cadmium	Calcium	Chromium	Cobalt	Lead	Lithium	Mercury	Molybdenum	Selenium	Thallium	Chloride	Fluoride	Sulfate	Total Dissolved Solids	pH	Radium 226	Radium 228	Radium 226+228
Drinking Water MCL		6	10	2,000	4	NS	5	NS	100	NS	15*	NS	2	NS	50	2	NS	4,000	NS	NS	NS	NS	NS	5
CCR Alt. Standards		NA	NA	NA	NA	NA	NA	NA	NA	6	15	40	NA	100	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GW-1/(AGQS)		6 ‡	10 ‡	2,000 ‡	4 ‡	6,000 ‡	5 ‡	NS ‡	100	NS ‡	15 ‡	NS	2 ‡	NS	50 ‡	2 ‡	NS	4,000	500,000	NS	NS	NS	NS	NS
GW-2		NA	NA	NA	NA	NA	NA	NS	NA	NS	NA	NS	NA	NS	NA	NA	NS	†	†	NS	NS	NS	NS	NS
SB-13	2/23/2016	<1.0	<1.0	17	<1.0	<50	<1.0	9,900	<1.0	<1.0	<1.0	<1,000	<0.10	<1.0	<1.0	<1.0	160,000	<100	6,000	270,000	5.34	0.6 ±0.1	0.3 ±0.6	0.9 ±0.6
	4/25/2016	<1.0	<1.0	17	<1.0	<50	<1.0	8,800	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	160,000	<100	7,000	290,000	5.48	0.4 ±0.3	0.1 ±0.4	0.5 ±0.4
	6/6/2016	<1.0	<1.0	20	<1.0	<50	<1.0	9,900	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	170,000	<100	7,000	320,000	5.50	0.8 ±0.3	0.0 ±0.5	0.8 ±0.5
	7/18/2016	<1.0	<1.0	18	<1.0	<50	<1.0	9,700	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	160,000	<100	8,000	330,000	5.27	0.8 ±0.3	0.0 ±0.6	0.8 ±0.6
	8/30/2016	<1.0	1.0	20	<1.0	<50	<1.0	8,100	2.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	150,000	<100	8,000	270,000	5.35	0.8 ±0.3	0.6 ±0.4	1.4 ±0.4
	10/17/2016	<1.0	<1.0	15	<1.0	<50	<1.0	8,800	2.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	150,000	<100	8,000	260,000	5.06	0.7 ±0.4	0.6 ±0.5	1.3 ±0.5
	11/29/2016	<1.0	<1.0	16	<1.0	<50	<1.0	7,400	1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	140,000	<100	8,000	240,000	5.71	0.6 ±0.3	0.7 ±0.5	1.3 ±0.5
	4/19/2017	<1.0	<1.0	16	<1.1	<51	<1.1	8,000	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	130,000	<100	8,000	270,000	5.56	0.9 ±0.3	0.3 ±0.5	1.2 ±0.5
	11/17/2017					<50		7,000									110,000	<100	9,000	220,000	5.80			
	4/9/2018					<50		11,000									170,000	<100	8,000	330,000	5.81			
	7/25/2018							10,000									190,000		8,700	340,000	5.69			
	11/28/2018					<50		13,000									200,000	<100	7,200	260,000	5.77			
	4/26/2019					<50		14,000									200,000	<100	7,100	290,000	5.53			
	11/15/2019					<50		8,100									140,000	<100	8,100	280,000	5.82			
4/23/2020					<50		14,000									230,000	<100	6,500	400,000	5.47				
7/8/2020					<50		14,000									210,000		6,900	370,000	5.41				
11/12/2020					<50		11,000									180,000	<100	8,000	330,000	4.96				
SB-14	2/24/2016	<1.0	<1.0	3.0	<1.0	<50	<1.0	6,100	<1.0	<1.0	<1.0	<1,000	<0.10	<1.0	<1.0	<1.0	16,000	<100	4,000	56,000	5.05	0.2 ±0.08	0.0 ±0.5	0.2 ±0.5
	4/25/2016	<1.0	<1.0	9.0	<1.0	<50	<1.0	11,000	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	58,000	<100	3,000	140,000	5.62	0.8 ±0.5	0.2 ±0.1	1.0 ±0.5
	6/6/2016	<1.0	<1.0	6.0	<1.0	<50	<1.0	7,600	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	32,000	<100	4,000	100,000	5.39	0.5 ±0.2	0.2 ±0.5	0.7 ±0.5
	7/18/2016	<1.0	<1.0	3.0	<1.0	<50	<1.0	6,300	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	21,000	<100	5,000	68,000	5.31	0.2 ±0.2	0.3 ±0.5	0.5 ±0.5
	8/30/2016	<1.0	<1.0	2.0	<1.0	<50	<1.0	5,300	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	14,000	<100	4,000	71,000	5.81	0.4 ±0.3	0.4 ±0.5	0.8 ±0.5
	10/17/2016	<1.0	<1.0	2.0	<1.0	<50	<1.0	4,000	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	11,000	<100	4,000	29,000	5.55	0.2 ±0.3	0.0 ±0.5	0.2 ±0.5
	11/29/2016	<1.0	<1.0	2.0	<1.0	<50	<1.0	2,900	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	7,000	<100	4,000	12,000	5.19	0.2 ±0.4	0.2 ±0.5	0.4 ±0.5
	4/19/2017	<1.0	<1.0	10	<1.0	<50	<1.0	10,000	<1.0	<1.0	<1.0	<100	<0.10	<1.0	<1.0	<1.0	56,000	<100	5,000	120,000	5.59	0.7 ±0.3	0.1 ±0.5	0.8 ±0.5
	11/17/2017					<50		8,000									18,000	<100	5,000	59,000	5.60			
	4/9/2018					<50		4,200									14,000	<100	8,400	80,000	5.76			
	7/25/2018							5,100									9,800		6,100	56,000	5.61			
	11/28/2018					<50		4,500									7,800	<100	6,300	<5,000	5.96			
	4/26/2019					<50		8,700									19,000	<100	3,700	91,000	5.74			
	11/15/2019					<50		5,000									12,000	<100	7,800	69,000	5.94			
4/23/2020					<50		5,500									9,200	<100	5,500	52,000	5.63				
11/12/2020					<50		4,000									4,700	<100	15,000	68,000	5.1				

- Notes:
1. Samples were collected by Eastern Analytical, Inc. (EAI) of Concord, New Hampshire on the dates indicated and analyzed by EAI for select metals by USEPA Method 6020. Additional analysis for select wet chemistry parameters were completed by EAI. Analysis for radium 226 and 228 was completed by KNL Environmental Testing, Inc., of Tampa, Florida. Analysis for lithium was completed by SGS Accutest, of Marlborough, Massachusetts (Feb. 2016) and Katahdin Analytical Services, of Scarborough, Maine (April 2016 through October 2016).
 2. Concentrations are presented in micrograms per liter (µg/L), which are equivalent to parts per billion (ppb), or they are presented in picoCuries per liter (pCi/L) or pH standard units.
 3. "<" indicates the analyte was not detected above the indicated laboratory reporting limit.
A blank indicates the sample was not analyzed for this parameter.
 4. "GW-1" and "GW-2" Groundwater Standards are from the New Hampshire Department of Environmental Services (NHDES) Contaminated Sites Risk Characterization and Management Policy (RCMP) (January 1998, with 2000 through 2018 revisions/addenda). GW-1 Groundwater Standards are equivalent to the Ambient Groundwater Quality Standards (AGQSs) promulgated in Env-Or 600 (June 2015 with October 2016, September 2018, September 2019, and May 2020 amendments). The AGQS/GW-1 Groundwater Standards are intended to be protective of groundwater as a source of drinking water. The GW-2 Groundwater Standards apply to groundwater as a potential source of indoor air contamination.
 5. "Drinking Water MCLs" are from the United States Environmental Protection Agency (EPA) website (accessed March 22, 2016). The Maximum Contaminant Level (MCL) is the highest level of a contaminant that is allowed in drinking water. MCLs are enforceable standards for drinking water systems.
"CCR Alt. Standards" were codified in 40 CFR Part 257.95(h)(2) for cobalt, lead, lithium, and molybdenum. These are alternative risk-based standards for the four constituents without MCLs that may require establishment of a groundwater protection standard under the coal combustion residuals (CCR) rules 40 CFR Part 257(h).
 6. "*" indicates an MCL value is not currently available, and the listed value is an action level.
"†" indicates the RCMP lists the value as not currently available.
"‡" indicates the value provided is the corresponding "dissolved metal" NHDES standard for reference only; NHDES standards for total metals are listed in the RCMP.
"NA" indicates the RCMP lists the value as not applicable.
"NS" indicates the analyte is not listed in the RCMP or MCL list.

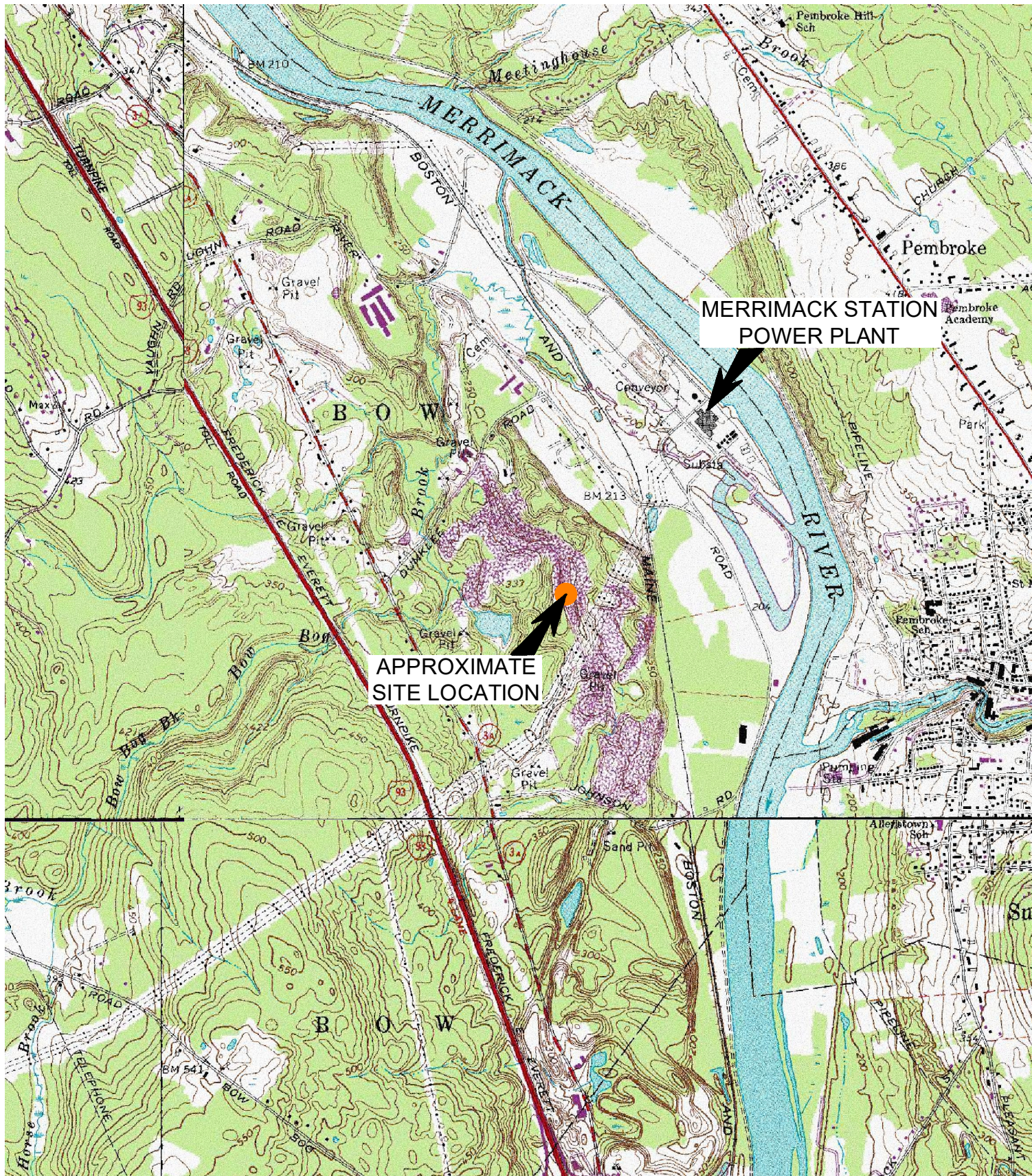
TABLE 2
Groundwater Level Measurements Summary
Merrimack Station Coal Ash Landfill
Bow, New Hampshire

Date	Depths and elevations in feet.															Inferred General Groundwater Flow Rate (feet/day)	Inferred General Groundwater Flow Direction
	SB-1			SB-4			SB-6			SB-13			SB-14				
	Reference Elevation	Depth to Water	Water Elevation	Reference Elevation	Depth to Water	Water Elevation	Reference Elevation	Depth to Water	Water Elevation	Reference Elevation	Depth to Water	Water Elevation	Reference Elevation	Depth to Water	Water Elevation		
Feb-16	240.85	33.82	207.03	274.26	67.36	206.90	268.77	61.84	206.93	219.86	11.83	208.03	242.70	34.88	207.82	0.5 - 2.7	Northeast
Apr-16	240.85	32.19	208.66	274.26	65.63	208.63	268.77	60.07	208.70	219.86	10.16	209.70	242.70	33.13	209.57	0.5 - 2.5	Northeast
Jun-16	240.85	31.84	209.01	274.26	66.24	208.02	268.77	60.80	207.97	219.86	11.11	208.75	242.70	33.93	208.77	0.4 - 1.9	East
Jul-16	240.85	33.88	206.97	274.26	67.30	206.96	268.77	62.07	206.70	219.86	12.41	207.45	242.70	35.10	207.60	0.4 - 1.9	Northeast
Aug-16	240.85	35.09	205.76	274.26	68.54	205.72	268.77	63.19	205.58	219.86	13.76	206.10	242.70	36.39	206.31	0.3 - 1.4	Northeast
Oct-16	240.85	36.20	204.65	274.26	69.68	204.58	268.77	64.42	204.35	219.86	13.92	205.94	242.70	37.58	205.12	0.8 - 3.9	North-Northeast
Nov-16	240.85	36.40	204.45	274.26	69.93	204.33	268.77	64.69	204.08	219.86	15.14	204.72	242.70	37.80	204.90	0.3 - 1.6	East-Northeast
Apr-17	240.85	32.27	208.58	274.26	65.82	208.44	268.77	60.04	208.73	219.86	9.58	210.28	242.70	32.99	209.71	0.8 - 3.8	North-Northeast
Nov-17	240.85	32.87	207.98	274.26	66.39	207.87	268.77	60.97	207.80	219.86	11.33	208.53	242.70	34.08	208.62	0.4 - 1.8	Northeast
Apr-18	240.85	31.13	209.72	274.26	64.58	209.68	268.77	58.93	209.84	219.86	8.74	211.12	242.70	31.94	210.76	0.6 - 3.2	North-Northeast
Jul-18	240.85	32.60	208.25	274.26	66.01	208.25	268.77	60.84	207.93	219.86	11.13	208.73	242.70	33.78	208.92	0.4 - 2.0	Northeast
Nov-18	240.85	29.99	210.86	274.26	63.59	210.67	268.77	57.92	210.85	219.86	7.66	212.20	242.70	30.82	211.88	0.7 - 3.3	Northeast
Apr-19	240.85	29.83	211.02	274.26	63.34	210.92	268.77	57.60	211.17	219.86	7.51	212.35	242.70	30.72	211.98	0.6 - 2.9	North-Northeast
Jul-19	-	-	-	-	-	-	268.77	58.71	210.06	-	-	-	-	-	-	-	-
Nov-19	240.85	34.48	206.37	274.26	67.96	206.30	268.77	62.66	206.11	219.86	13.21	206.65	242.70	35.85	206.85	0.3 - 1.3	East-Northeast
Feb-20	-	-	-	274.26	66.67	207.59	268.77	61.12	207.65	-	-	-	-	-	-	-	-
Apr-20	240.85	31.84	209.01	274.26	65.34	208.92	268.77	59.73	209.04	219.86	9.62	210.24	242.70	32.75	209.95	0.6 - 3.0	North-Northeast
Jul-20	-	-	-	274.26	66.00	208.26	-	-	-	219.86	11.00	208.86	-	-	-	-	-
Nov-20	240.85	35.72	205.13	274.26	69.23	205.03	268.77	63.92	204.85	219.86	14.48	205.38	242.70	37.09	205.61	0.3 - 1.3	East-Northeast

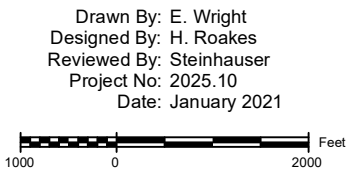
Notes:

1. Depths to water were obtained from information provided in laboratory reports and field sampling sheets prepared by Eastern Analytical, Inc.
2. Inferred general groundwater flow rates and flow directions are approximate and are based on the limited hydrogeologic and groundwater elevation data available. Other interpretations are possible and actual conditions may vary from those indicated. Note that groundwater elevations, directions, and rates may change due to seasonal or other variations in temperature, precipitation, runoff, or other factors.
3. Approximate groundwater flow rates were calculated using an assumed saturated hydraulic conductivity of 100 to 500 feet per day, and an assumed porosity of 39%. Assumptions are consistent with values typical of medium-grained, clean sand. The calculated groundwater flow rate is equivalent to the average interstitial velocity or the seepage velocity.

FIGURES



NOTES:
 BASE MAP TAKEN FROM 7.5
 MINUTE
 USGS QUADRANGLE MAP:
 BOW, NEW HAMPSHIRE 1967
 (PHOTO REVISED 1998)



SANBORN HEAD

Drawn By: E. Wright
 Designed By: H. Roakes
 Reviewed By: Steinhauser
 Project No: 2025.10
 Date: January 2021

Figure 1
Locus Plan

2021 Annual Groundwater Monitoring
 and Corrective Action Report
 Merrimack Station
 Coal Ash Landfill
 Bow, New Hampshire

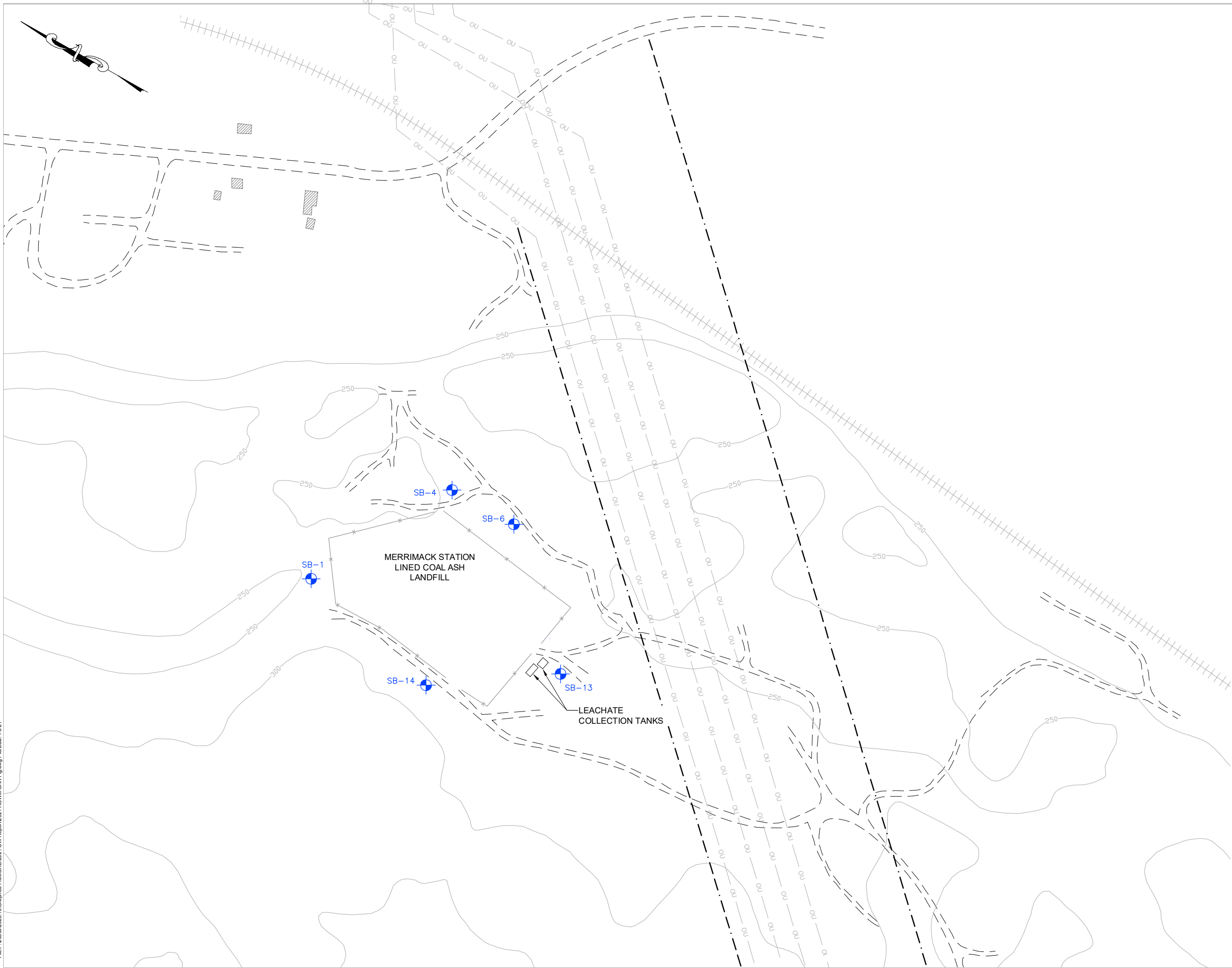


Figure 2

Facility Plan

2021 Annual Groundwater Monitoring and Corrective Action Report






Merrimack Station
Coal Ash Landfill
Bow, New Hampshire

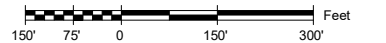
Drawn By: E. Wright
Designed By: H. Roakes
Reviewed By: E. Steinhauser
Project No: 2025.10
Date: January 2021

Notes

1. The base map was developed from a drawing prepared by Public Service Company of New Hampshire's Engineering Division entitled, "Area Plan, Merrimack Station, Bow, N.H." The drawing was dated 5/1/90 and was last revised on 6/28/95.
2. The location of the landfill and the site features shown should be considered approximate.

Legend

- SB-4  Monitoring Well
-  Right-Of-Way
-  Fence
-  Overhead Utilities
-  Elevation Contour



ATTACHMENT A
LIMITATIONS

ATTACHMENT A

LIMITATIONS

1. The conclusions and recommendations described in this report are based in part on the data obtained from a limited number of groundwater samples from widely-spaced monitoring locations. The monitoring locations indicate conditions only at the specific locations and times, and only to the depths sampled. They do not necessarily reflect variations that may exist between such locations, and the nature and extent of variations between these monitoring locations may not become evident until further study or remediation is initiated. The validity of the conclusions is based in part on assumptions Sanborn Head has made about conditions at the site. If conditions different from those described become evident, it will be necessary to re-evaluate the conclusions of this report.
2. Water level measurements were made in the monitoring well locations at times and under conditions stated within the report. Fluctuations in the levels of the groundwater may occur due to variations in precipitation and other factors not evident at the time measurements were made.
3. Quantitative laboratory analyses were performed as noted within the report. Additional analytes not searched for during the current study may be present in groundwater at the site. Sanborn Head has relied upon the data provided by the analytical laboratory and did not conduct an independent evaluation of the reliability of these data. Additionally, variations in the types and concentrations of analytes and variations in their distributions within the groundwater may occur due to the passage of time, seasonal water table fluctuations, recharge events, and other factors.
4. The conclusions and recommendations contained in this report are based in part upon various types of chemical data as well as historical and hydrogeologic information developed during previous studies. While Sanborn Head has reviewed those data and information as stated in this report, any of Sanborn Head's interpretations, conclusions, and recommendations that have relied on that information will be contingent on its validity. Should additional chemical data, historical information, or hydrogeologic information become available in the future, such information should be reviewed by Sanborn Head and the interpretations, conclusions, and recommendations presented herein should be modified accordingly.
5. This report was prepared for the exclusive use of GSP Merrimack LLC (GSP) for specific application for 40 CFR Part 257.90 compliance for GSP's Merrimack Station Coal Ash landfill in Bow, New Hampshire, and was prepared in accordance with generally-accepted hydrogeologic practices. No warranty, express or implied, is made.

ATTACHMENT B
ANALYTICAL LABORATORY REPORTS

February 2020



Eastern Analytical, Inc.

professional laboratory and drilling services

Allan Palmer
Granite Shore Power
431 River Road
Bow, NH 03304



Subject: Laboratory Report

Eastern Analytical, Inc. ID: 206856
Client Identification: Merrimack Station - Coal Ash
Date Received: 2/14/2020

Dear Mr. Palmer :

Enclosed please find the laboratory report for the above identified project. All analyses were performed in accordance with our QA/QC Program. Unless otherwise stated, holding times, preservation techniques, container types, and sample conditions adhered to EPA Protocol. Samples which were collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures. Eastern Analytical, Inc. certifies that the enclosed test results meet all requirements of NELAP and other applicable state certifications. Please refer to our website at www.easternanalytical.com for a copy of our NELAP certificate and accredited parameters.

The following standard abbreviations and conventions apply to all EAI reports:

- Solid samples are reported on a dry weight basis, unless otherwise noted
- < : "less than" followed by the reporting limit
- > : "greater than" followed by the reporting limit
- %R : % Recovery


Eastern Analytical Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269), Vermont (VT1012) and New York (12072).

The following information is contained within this report: Sample Conditions summary, Analytical Results/Data, Quality Control data (if requested) and copies of the Chain of Custody. This report may not be reproduced except in full, without the the written approval of the laboratory.

If you have any questions regarding the results contained within, please feel free to directly contact me or the chemist(s) who performed the testing in question. Unless otherwise requested, we will dispose of the sample (s) 30 days from the sample receipt date.

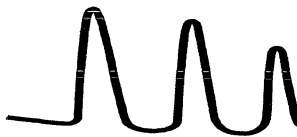
We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,


Lorraine Olashaw, Lab Director

2-28-20
Date

5
of pages (excluding cover letter)



SAMPLE CONDITIONS PAGE

EAI ID#: 206856

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Temperature upon receipt (°C): 1.1

Received on ice or cold packs (Yes/No): Y

Acceptable temperature range (°C): 0-6

Lab ID	Sample ID	Date Received	Date Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
206856.01	SB-4	2/14/20	2/14/20	aqueous		Adheres to Sample Acceptance Policy
206856.02	SB-6	2/14/20	2/14/20	aqueous		Adheres to Sample Acceptance Policy
206856.03	Leachate	2/14/20	2/14/20	aqueous		Adheres to Sample Acceptance Policy

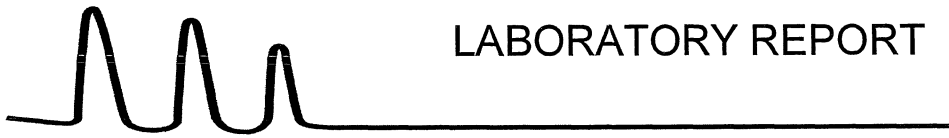
Samples were properly preserved and the pH measured when applicable unless otherwise noted. Analysis of solids for pH, Flashpoint, Ignitability, Paint Filter, Corrosivity, Conductivity and Specific Gravity are reported on an "as received" basis.

Immediate analyses, pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite, performed at the laboratory were run outside of the recommended 15 minute hold time.

All results contained in this report relate only to the above listed samples.

References include:

- 1) EPA 600/4-79-020, 1983
- 2) Standard Methods for Examination of Water and Wastewater, 20th, 21st, 22nd & 23rd Edition or noted Revision year.
- 3) Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- 4) Hach Water Analysis Handbook, 4th edition, 1992



LABORATORY REPORT

EAI ID#: **206856**

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Sample ID:	SB-4	SB-6	Leachate	Analysis				
Lab Sample ID:	206856.01	206856.02	206856.03	Units	Date	Time	Method	Analyst
Matrix:	aqueous	aqueous	aqueous					
Date Sampled:	2/14/20	2/14/20	2/14/20					
Date Received:	2/14/20	2/14/20	2/14/20					
Solids Dissolved	190	130	3300	mg/L	2/20/20	10:50	2540C-11	KJD
Sulfate	14	15	2300	mg/L	2/19/20	7:24	300.0	KD
Chloride	100	79	35	mg/L	2/19/20	9:42	300.0	KD
Alkalinity Total (CaCO3)	15	15	260	mg/L	2/21/20	10:25	2320B-11	ATA



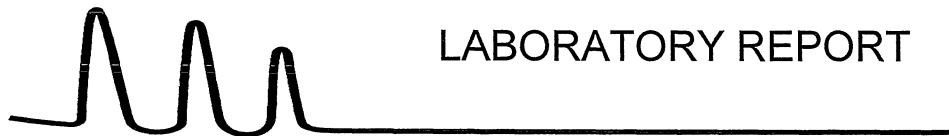
LABORATORY REPORT

EAI ID#: 206856

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Sample ID:	SB-4	SB-6	Leachate						
Lab Sample ID:	206856.01	206856.02	206856.03						
Matrix:	aqueous	aqueous	aqueous						
Date Sampled:	2/14/20	2/14/20	2/14/20						
Date Received:	2/14/20	2/14/20	2/14/20						
				Analytical Matrix	Units	Date of Analysis	Method	Analyst	
Boron	< 0.05	< 0.05	20	AqTot	mg/L	2/24/20	200.8	DS	
Calcium	11	5.1	310	AqTot	mg/L	2/24/20	200.8	DS	
Magnesium	2.7	1.3	180	AqTot	mg/L	2/24/20	200.8	DS	
Potassium	2.0	1.2	77	AqTot	mg/L	2/24/20	200.8	DS	
Sodium	64	54	380	AqTot	mg/L	2/24/20	200.8	DS	



LABORATORY REPORT

EAI ID#: 206856

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Sample ID:	SB-4	SB-6	Leachate				
Lab Sample ID:	206856.01	206856.02	206856.03				
Matrix:	aqueous	aqueous	aqueous				
Date Sampled:	2/14/20	2/14/20	2/14/20				
					Date of	Method	Analyst
				Units	Analysis		
Field pH	5.85	5.73	6.28	SU	2/14/20	SM4500	JL

CHAIN-OF-CUSTODY RECORD

eastern analytical
professional laboratory services

206856

SampleID	Date/Time	Matrix	Parameters	Sample Notes	# of containers
SB-4	02/14/2020 11:02	GW	Total Boron, Calcium, Magnesium, Potassium, Sodium, Chloride, Sulfate, Total Dissolved Solids, Total Alkalinity, Field pH		4
preservative: HCL HNO_3 H_2SO_4 NaOH MEOH $Na_2S_2O_3$ (CE)					
SB-6	02/14/2020 13:04	GW	Total Boron, Calcium, Magnesium, Potassium, Sodium, Chloride, Sulfate, Total Dissolved Solids, Total Alkalinity, Field pH		4
preservative: HCL HNO_3 H_2SO_4 NaOH MEOH $Na_2S_2O_3$ (CE)					
Leachate	02/14/2020 13:54	WW	Total Boron, Calcium, Magnesium, Potassium, Sodium, Chloride, Sulfate, Total Dissolved Solids, Total Alkalinity, Field pH		4
preservative: HCL HNO_3 H_2SO_4 NaOH MEOH $Na_2S_2O_3$ (CE)					

aClientID Merrimack Station - Coal Ash
 nProjectID 3949 nYearMonth 2020.02
 Client (Pro Mgr) Allan Palmer
 Customer Granite Shore Power
 Address 431 River Road
 City Bow NH 03304
 Phone 224-4081
 Fax 224-4081

Results Needed by: Preferred date _____
 Notes about project _____

Reporting Options
 HC NO FAX EDD Disk
 Fax No partial FAX EDD email
 PO# _____
 Quote# _____
 Temperature 11.0C
 Samples Collected by: JL/EA
 Relinquished by: [Signature] Date/Time 02/14/2020 15:20
 Relinquished by: [Signature] Date/Time 02/14/2020 15:20
 Received by: [Signature]

April 2020



Eastern Analytical, Inc.

professional laboratory and drilling services

Allan Palmer
Granite Shore Power
431 River Road
Bow, NH 03304



Subject: Laboratory Report

Eastern Analytical, Inc. ID: 209412
Client Identification: Merrimack Station - Coal Ash
Date Received: 4/23/2020

Dear Mr. Palmer :

Enclosed please find the laboratory report for the above identified project. All analyses were performed in accordance with our QA/QC Program. Unless otherwise stated, holding times, preservation techniques, container types, and sample conditions adhered to EPA Protocol. Samples which were collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures. Eastern Analytical, Inc. certifies that the enclosed test results meet all requirements of NELAP and other applicable state certifications. Please refer to our website at www.easternanalytical.com for a copy of our NELAP certificate and accredited parameters.

The following standard abbreviations and conventions apply to all EAI reports:

- Solid samples are reported on a dry weight basis, unless otherwise noted
- < : "less than" followed by the reporting limit
- > : "greater than" followed by the reporting limit
- %R : % Recovery

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If you have any questions regarding the results contained within, please feel free to directly contact me or the chemist(s) who performed the testing in question. Unless otherwise requested, we will dispose of the sample (s) 30 days from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,

Lorraine Olashaw
Lorraine Olashaw, Lab Director

5.6.20
Date

5
of pages (excluding cover letter)



SAMPLE CONDITIONS PAGE

EAI ID#: 209412

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Temperature upon receipt (°C): 5.5

Received on ice or cold packs (Yes/No): Y

Acceptable temperature range (°C): 0-6

Lab ID	Sample ID	Date Received	Date Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
209412.01	SB-1	4/23/20	4/23/20	aqueous		Adheres to Sample Acceptance Policy
209412.02	SB-4	4/23/20	4/23/20	aqueous		Adheres to Sample Acceptance Policy
209412.03	SB-6	4/23/20	4/23/20	aqueous		Adheres to Sample Acceptance Policy
209412.04	SB-13	4/23/20	4/23/20	aqueous		Adheres to Sample Acceptance Policy
209412.05	SB-14	4/23/20	4/23/20	aqueous		Adheres to Sample Acceptance Policy

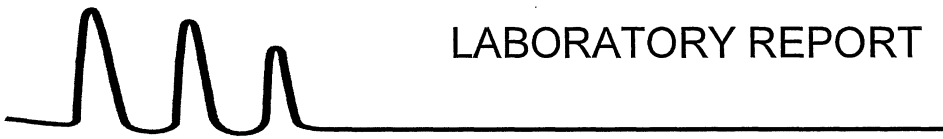
Samples were properly preserved and the pH measured when applicable unless otherwise noted. Analysis of solids for pH, Flashpoint, Ignitability, Paint Filter, Corrosivity, Conductivity and Specific Gravity are reported on an "as received" basis.

Immediate analyses, pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite, performed at the laboratory were run outside of the recommended 15 minute hold time.

All results contained in this report relate only to the above listed samples.

References include:

- 1) EPA 600/4-79-020, 1983
- 2) Standard Methods for Examination of Water and Wastewater, 20th, 21st, 22nd & 23rd Edition or noted Revision year.
- 3) Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- 4) Hach Water Analysis Handbook, 4th edition, 1992



LABORATORY REPORT

EAI ID#: 209412

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Sample ID:	SB-1	SB-4	SB-6	SB-13						
Lab Sample ID:	209412.01	209412.02	209412.03	209412.04						
Matrix:	aqueous	aqueous	aqueous	aqueous						
Date Sampled:	4/23/20	4/23/20	4/23/20	4/23/20						
Date Received:	4/23/20	4/23/20	4/23/20	4/23/20						
					Units	Analysis		Date	Time	Method Analyst
Solids Dissolved	150	260	270	400	mg/L	04/29/20	12:48	2540C-11	KJD	
Fluoride	< 0.1	< 0.1	< 0.1	< 0.1	mg/L	04/28/20	6:12	300.0	ATA	
Sulfate	11	11	8.1	6.5	mg/L	04/28/20	6:12	300.0	ATA	
Chloride	53	140	160	230	mg/L	04/28/20	13:34	4500CLE-11	ATA	
Alkalinity Total (CaCO3)	30	12	8.2	5.8	mg/L	04/28/20	8:38	2320B-11	ATA	

Sample ID: SB-14

Lab Sample ID:	209412.05						
Matrix:	aqueous						
Date Sampled:	4/23/20						
Date Received:	4/23/20						
		Units	Analysis		Date	Time	Method Analyst
Solids Dissolved	52	mg/L	04/29/20	12:48	2540C-11	KJD	
Fluoride	< 0.1	mg/L	04/28/20	7:46	300.0	ATA	
Sulfate	5.5	mg/L	04/28/20	7:46	300.0	ATA	
Chloride	9.2	mg/L	04/28/20	13:53	4500CLE-11	ATA	
Alkalinity Total (CaCO3)	13	mg/L	04/28/20	8:38	2320B-11	ATA	



LABORATORY REPORT

EAI ID#: 209412

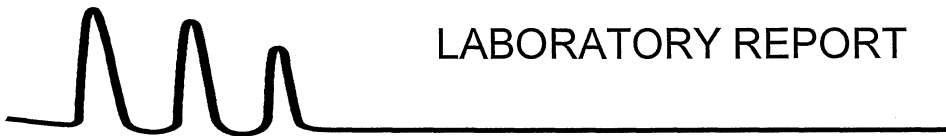
Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Sample ID:	SB-1	SB-4	SB-6	SB-13					
Lab Sample ID:	209412.01	209412.02	209412.03	209412.04					
Matrix:	aqueous	aqueous	aqueous	aqueous					
Date Sampled:	4/23/20	4/23/20	4/23/20	4/23/20	Analytical		Date of		
Date Received:	4/23/20	4/23/20	4/23/20	4/23/20	Matrix	Units	Analysis	Method	Analyst
Boron	0.070	0.055	< 0.05	< 0.05	AqTot	mg/L	4/27/20	200.8	HEH
Calcium	14	13	12	14	AqTot	mg/L	4/27/20	200.8	HEH
Magnesium	3.0	3.2	2.8	3.0	AqTot	mg/L	4/27/20	200.8	HEH
Potassium	1.7	2.3	1.9	2.1	AqTot	mg/L	4/27/20	200.8	HEH
Sodium	34	83	92	140	AqTot	mg/L	4/27/20	200.8	HEH

Sample ID: SB-14

Lab Sample ID:	209412.05								
Matrix:	aqueous								
Date Sampled:	4/23/20				Analytical		Date of		
Date Received:	4/23/20				Matrix	Units	Analysis	Method	Analyst
Boron	< 0.05				AqTot	mg/L	4/27/20	200.8	HEH
Calcium	5.5				AqTot	mg/L	4/27/20	200.8	HEH
Magnesium	1.4				AqTot	mg/L	4/27/20	200.8	HEH
Potassium	0.76				AqTot	mg/L	4/27/20	200.8	HEH
Sodium	6.8				AqTot	mg/L	4/27/20	200.8	HEH



LABORATORY REPORT

EAI ID#: **209412**

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Sample ID:	SB-1	SB-4	SB-6	SB-13					
Lab Sample ID:	209412.01	209412.02	209412.03	209412.04					
Matrix:	aqueous	aqueous	aqueous	aqueous					
Date Sampled:	4/23/20	4/23/20	4/23/20	4/23/20					
						Date of			
						Units	Analysis	Method	Analyst
Field pH	5.94	5.72	5.56	5.47	SU	4/23/20	SM4500H	TNC	

Sample ID:	SB-14								
Lab Sample ID:	209412.05								
Matrix:	aqueous								
Date Sampled:	4/23/20								
						Date of			
						Units	Analysis	Method	Analyst
Field pH	5.63				SU	4/23/20	SM4500H	JL	

P.1 of 1
CHAIN-OF-CUSTODY RECORD

eastern analytical
 professional laboratory services

209412

SampleID Date/Time aMatrix Parameters Sample Notes # of containers

SB-1 04.23.2020 15:05 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Flouride, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity [4]

preservative: HCL HNO₃ H₂SO₄ NaOH MEOH Na₂S₂O₃ (CE)

SB-4 04.23.2020 10:59 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Flouride, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity [4]

preservative: HCL HNO₃ H₂SO₄ NaOH MEOH Na₂S₂O₃ (CE)

SB-6 04.23.2020 13:15 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Flouride, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity [4]

preservative: HCL HNO₃ H₂SO₄ NaOH MEOH Na₂S₂O₃ (CE)

SB-13 04.23.2020 13:15 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Flouride, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity [4]

preservative: HCL HNO₃ H₂SO₄ NaOH MEOH Na₂S₂O₃ (CE)

SB-14 04.23.2020 13:30 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Flouride, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity [4]

preservative: HCL HNO₃ H₂SO₄ NaOH MEOH Na₂S₂O₃ (CE)

aClientID Merrimack Station - Coal Ash
 nProjectID 3949 nYearMonth 2020.04

Client (Pro Mgr) Allan Palmer

Customer Granite Shore Power

Address 431 River Road

City Bow NH 03304

Phone 224-4081

Fax 224-4081

Results Needed by: Preferred date _____
 Notes about project _____

Reporting Options

- HC NO FAX EDD Disk
- Fax No partial FAX EDD email

PO# 5990

Quote# _____

Temperature 55°C

ice: Y N
 Samples Collected by: JATE 1691
 Relinquished by: [Signature] 04.23.2020 16:40 Date/Time
 Relinquished by: [Signature] Date/Time Received by: [Signature]

Relinquished by _____ Date/Time _____ Received by _____

July 2020



Eastern Analytical, Inc.

professional laboratory and drilling services

Allan Palmer
Granite Shore Power
431 River Road
Bow, NH 03304



Subject: Laboratory Report

Eastern Analytical, Inc. ID: 212567
Client Identification: Merrimack Station - Coal Ash LF
Date Received: 7/8/2020

Dear Mr. Palmer :

Enclosed please find the laboratory report for the above identified project. All analyses were performed in accordance with our QA/QC Program. Unless otherwise stated, holding times, preservation techniques, container types, and sample conditions adhered to EPA Protocol. Samples which were collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures. Eastern Analytical, Inc. certifies that the enclosed test results meet all requirements of NELAP and other applicable state certifications. Please refer to our website at www.easternanalytical.com for a copy of our NELAP certificate and accredited parameters.

The following standard abbreviations and conventions apply to all EAI reports:

- Solid samples are reported on a dry weight basis, unless otherwise noted
- < : "less than" followed by the reporting limit
- > : "greater than" followed by the reporting limit
- %R : % Recovery

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The following information is contained within this report: Sample Conditions summary, Analytical Results/Data, Quality Control data (if requested) and copies of the Chain of Custody. This report may not be reproduced except in full, without the the written approval of the laboratory.

If you have any questions regarding the results contained within, please feel free to directly contact me or the chemist(s) who performed the testing in question. Unless otherwise requested, we will dispose of the sample (s) 30 days from the sample receipt date.

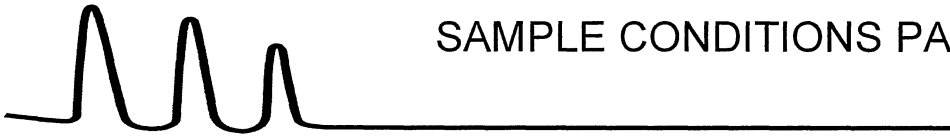
We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,

Lorraine Olashaw
Lorraine Olashaw, Lab Director

7.21.20
Date

5
of pages (excluding cover letter)



SAMPLE CONDITIONS PAGE

EAI ID#: 212567

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash LF**

Temperature upon receipt (°C): 3.4

Acceptable temperature range (°C): 0-6

Received on ice or cold packs (Yes/No): Y

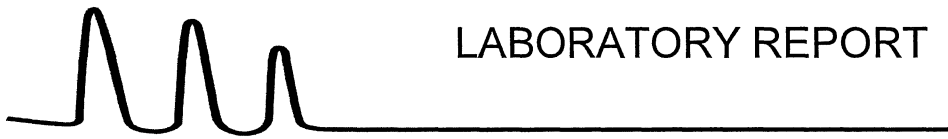
Lab ID	Sample ID	Date Received	Date Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
212567.01	SB-4	7/8/20	7/8/20	aqueous		Adheres to Sample Acceptance Policy
212567.02	SB-13	7/8/20	7/8/20	aqueous		Adheres to Sample Acceptance Policy

Samples were properly preserved and the pH measured when applicable unless otherwise noted. Analysis of solids for pH, Flashpoint, Ignitability, Paint Filter, Corrosivity, Conductivity and Specific Gravity are reported on an "as received" basis. Immediate analyses, pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite, performed at the laboratory were run outside of the recommended 15 minute hold time.

All results contained in this report relate only to the above listed samples.

References include:

- 1) EPA 600/4-79-020, 1983
- 2) Standard Methods for Examination of Water and Wastewater, 20th, 21st, 22nd & 23rd Edition or noted Revision year.
- 3) Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- 4) Hach Water Analysis Handbook, 4th edition, 1992



LABORATORY REPORT

EAI ID#: 212567

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash LF**

Sample ID: SB-4 SB-13

Lab Sample ID: 212567.01 212567.02

Matrix: aqueous aqueous

Date Sampled: 7/8/20 7/8/20

Date Received: 7/8/20 7/8/20

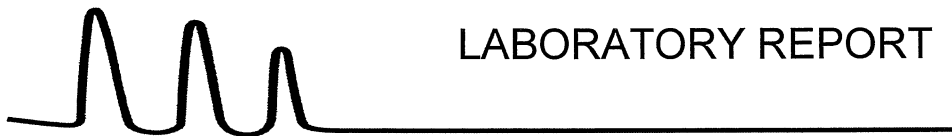
Solids Dissolved 240 370

Sulfate 14 6.9

Chloride 99 210

Alkalinity Total (CaCO₃) 15 7.8

Units	Analysis		Method	Analyst
	Date	Time		
mg/L	7/14/20	16:35	2540C-11	KJD
mg/L	7/13/20	17:54	300.0	ATA
mg/L	7/09/20	8:24	300.0	ATA
mg/L	7/09/20	10:30	2320B-11	ATA



LABORATORY REPORT

EAI ID#: **212567**

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash LF**

Sample ID: SB-4 SB-13

Lab Sample ID: 212567.01 212567.02

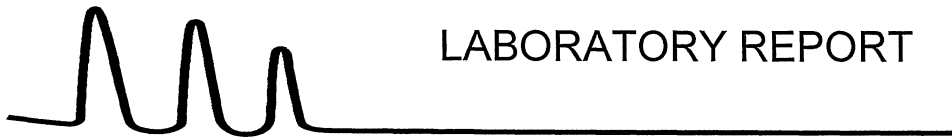
Matrix: aqueous aqueous

Date Sampled: 7/8/20 7/8/20

Date Received: 7/8/20 7/8/20

Boron	0.057	< 0.05
Calcium	11	14
Magnesium	2.6	2.9
Potassium	2.1	2.1
Sodium	66	130

Analytical Matrix	Units	Date of Analysis	Method	Analyst
AqTot	mg/L	7/9/20	200.8	DS
AqTot	mg/L	7/9/20	200.8	DS
AqTot	mg/L	7/9/20	200.8	DS
AqTot	mg/L	7/9/20	200.8	DS
AqTot	mg/L	7/9/20	200.8	DS



LABORATORY REPORT

EAI ID#: 212567

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash LF**

Sample ID: SB-4 SB-13

Lab Sample ID: 212567.01 212567.02

Matrix: aqueous aqueous

Date Sampled: 7/8/20 7/8/20

			Units	Date of Analysis	Method	Analyst
Field pH	5.59	5.41	SU	7/8/20	SM4500	TNC

CHAIN-OF-CUSTODY RECORD

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212567

15

aSampleID Date/Time aMatrix Parameters Sample Notes # of containers

SB-4 07/08/2020 1012 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity 4

preservative: HCL HNO₃ H₂SO₄ NaOH MEOH Na₂S₂O₃ **ICE**

SB-13 07/08/2020 1150 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity 4

preservative: HCL HNO₃ H₂SO₄ NaOH MEOH Na₂S₂O₃ **ICE**

aClientID Merrimack Station - Coal Ash 1F
nProjectID 3949 nYearMonth 2020.07

Results Needed by: Preferred date _____
Notes about project _____

Client (Pro Mgr) Allan Palmer
Customer Granite Shore Power
Address 431 River Road
City Bow NH 03304
Phone 230-7997
Fax

Reporting Options
 HC NO FAX EDD Disk
 Fax No partial FAX EDD email
 PO# _____
 Quote# _____
 Ice: y n
 Samples Collected by: EAT FS-TC Temperature: 3 °C
 Relinquished by: [Signature] Date/Time: 07/08/2020 1335 Received by: [Signature]

Relinquished by _____ Date/Time _____ Received by _____

November 2020



Eastern Analytical, Inc.

professional laboratory and drilling services

Allan Palmer
Granite Shore Power
431 River Road
Bow, NH 03304



Subject: Laboratory Report

Eastern Analytical, Inc. ID: 218733
Client Identification: Merrimack Station - Coal Ash
Date Received: 11/12/2020

Dear Mr. Palmer :

Enclosed please find the laboratory report for the above identified project. All analyses were performed in accordance with our QA/QC Program. Unless otherwise stated, holding times, preservation techniques, container types, and sample conditions adhered to EPA Protocol. Samples which were collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures. Eastern Analytical, Inc. certifies that the enclosed test results meet all requirements of NELAP and other applicable state certifications. Please refer to our website at www.easternanalytical.com for a copy of our NELAP certificate and accredited parameters.

The following standard abbreviations and conventions apply to all EAI reports:

- Solid samples are reported on a dry weight basis, unless otherwise noted
- < : "less than" followed by the reporting limit
- > : "greater than" followed by the reporting limit
- %R : % Recovery


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If you have any questions regarding the results contained within, please feel free to directly contact me or the chemist(s) who performed the testing in question. Unless otherwise requested, we will dispose of the sample (s) 30 days from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,


Lorraine Olashaw, Lab Director

11.30.20
Date

5
of pages (excluding cover letter)



SAMPLE CONDITIONS PAGE

EAI ID#: 218733

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Temperature upon receipt (°C): 3.1

Received on ice or cold packs (Yes/No): Y

Acceptable temperature range (°C): 0-6

Lab ID	Sample ID	Date Received	Date/Time Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
218733.01	SB-1	11/12/20	11/12/20 14:22	aqueous		Adheres to Sample Acceptance Policy
218733.02	SB-4	11/12/20	11/12/20 10:38	aqueous		Adheres to Sample Acceptance Policy
218733.03	SB-6	11/12/20	11/12/20 12:23	aqueous		Adheres to Sample Acceptance Policy
218733.04	SB-13	11/12/20	11/12/20 11:22	aqueous		Adheres to Sample Acceptance Policy
218733.05	SB-14	11/12/20	11/12/20 12:41	aqueous		Adheres to Sample Acceptance Policy

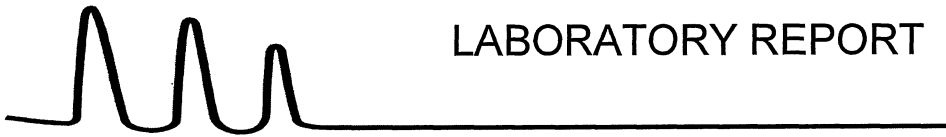
Samples were properly preserved and the pH measured when applicable unless otherwise noted. Analysis of solids for pH, Flashpoint, Ignitability, Paint Filter, Corrosivity, Conductivity and Specific Gravity are reported on an "as received" basis.

Immediate analyses, pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite, performed at the laboratory were run outside of the recommended 15 minute hold time.

All results contained in this report relate only to the above listed samples.

References include:

- 1) EPA 600/4-79-020, 1983
- 2) Standard Methods for Examination of Water and Wastewater, 20th, 21st, 22nd & 23rd Edition or noted Revision year.
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- 4) Hach Water Analysis Handbook, 4th edition, 1992



LABORATORY REPORT

EAI ID#: 218733

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Sample ID:	SB-1	SB-4	SB-6	SB-13						
Lab Sample ID:	218733.01	218733.02	218733.03	218733.04						
Matrix:	aqueous	aqueous	aqueous	aqueous						
Date Sampled:	11/12/20	11/12/20	11/12/20	11/12/20						
Date Received:	11/12/20	11/12/20	11/12/20	11/12/20						
					Units	Analysis				
						Date	Time	Method	Analyst	
Solids Dissolved	150	260	330	330	mg/L	11/18/20	16:50	2540C-11	KJD	
Fluoride	< 0.1	< 0.1	< 0.1	< 0.1	mg/L	11/17/20	14:41	300.0	ATA	
Sulfate	13	18	9.6	8	mg/L	11/17/20	14:41	300.0	ATA	
Chloride	64	120	180	180	mg/L	11/17/20	14:41	300.0	ATA	
Alkalinity Total (CaCO3)	11	12	9.3	9	mg/L	11/13/20	13:31	2320B-11	RB	

Sample ID: SB-14

Lab Sample ID: 218733.05

Matrix: aqueous

Date Sampled: 11/12/20

Date Received: 11/12/20

		Units	Analysis			
			Date	Time	Method	Analyst
Solids Dissolved	68	mg/L	11/18/20	16:50	2540C-11	KJD
Fluoride	< 0.1	mg/L	11/17/20	15:59	300.0	ATA
Sulfate	15	mg/L	11/17/20	16:44	300.0	ATA
Chloride	4.7	mg/L	11/17/20	16:44	300.0	ATA
Alkalinity Total (CaCO3)	14	mg/L	11/13/20	13:31	2320B-11	RB



LABORATORY REPORT

EAI ID#: 218733

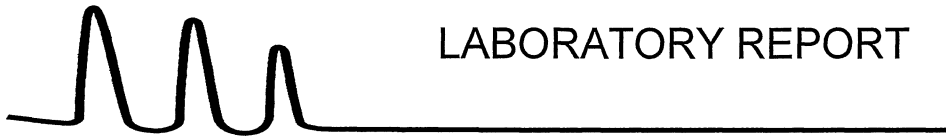
Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Sample ID:	SB-1	SB-4	SB-6	SB-13					
Lab Sample ID:	218733.01	218733.02	218733.03	218733.04					
Matrix:	aqueous	aqueous	aqueous	aqueous					
Date Sampled:	11/12/20	11/12/20	11/12/20	11/12/20	Analytical		Date of		
Date Received:	11/12/20	11/12/20	11/12/20	11/12/20	Matrix	Units	Analysis	Method	Analyst
Boron	< 0.05	0.060	< 0.05	< 0.05	AqTot	mg/L	11/13/20	200.8	DS
Calcium	10	9.6	12	11	AqTot	mg/L	11/13/20	200.8	DS
Magnesium	2.7	2.5	3.1	2.6	AqTot	mg/L	11/13/20	200.8	DS
Potassium	1.6	2.2	2.3	2.2	AqTot	mg/L	11/13/20	200.8	DS
Sodium	35	84	110	120	AqTot	mg/L	11/13/20	200.8	DS

Sample ID: SB-14

Lab Sample ID:	218733.05								
Matrix:	aqueous								
Date Sampled:	11/12/20				Analytical		Date of		
Date Received:	11/12/20				Matrix	Units	Analysis	Method	Analyst
Boron	< 0.05				AqTot	mg/L	11/13/20	200.8	DS
Calcium	4.0				AqTot	mg/L	11/13/20	200.8	DS
Magnesium	1.1				AqTot	mg/L	11/13/20	200.8	DS
Potassium	0.84				AqTot	mg/L	11/13/20	200.8	DS
Sodium	12				AqTot	mg/L	11/13/20	200.8	DS



LABORATORY REPORT

EAI ID#: 218733

Client: **Granite Shore Power**

Client Designation: **Merrimack Station - Coal Ash**

Sample ID:	SB-1	SB-4	SB-6	SB-13				
Lab Sample ID:	218733.01	218733.02	218733.03	218733.04				
Matrix:	aqueous	aqueous	aqueous	aqueous				
Date Sampled:	11/12/20	11/12/20	11/12/20	11/12/20				
						Date of		
					Units	Analysis	Method	Analyst
Field pH	5.36	5.18	5.37	4.96	SU	11/12/20	SM4500H	TNC

Sample ID:	SB-14							
Lab Sample ID:	218733.05							
Matrix:	aqueous							
Date Sampled:	11/12/20							
						Date of		
					Units	Analysis	Method	Analyst
Field pH	5.10				SU	11/12/20	SM4500H	JL

CHAIN-OF-CUSTODY RECORD

eastern analytical
professional laboratory services

218733

LS

aSampleID Date/Time aMatrix Parameters Sample Notes # of containers

SB-1 11/2/2020 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Flouride, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity 4

preservative: HCL (HNO₃) H₂SO₄, NaOH, MEOH, Na₂S₂O₃ (CF)

SB-4 11/2/2020 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Flouride, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity 4

preservative: HCL (HNO₃) H₂SO₄, NaOH, MEOH, Na₂S₂O₃ (CF)

SB-6 11/2/2020 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Flouride, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity 4

preservative: HCL (HNO₃) H₂SO₄, NaOH, MEOH, Na₂S₂O₃ (CF)

SB-13 11/2/2020 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Flouride, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity 4

preservative: HCL (HNO₃) H₂SO₄, NaOH, MEOH, Na₂S₂O₃ (CF)

SB-14 11/2/2020 GW Total Boron, Calcium, Magnesium, Potassium, Sodium, Flouride, Chloride, Sulfate, Field pH, Total Dissolved Solids, Total Alkalinity 4

preservative: HCL (HNO₃) H₂SO₄, NaOH, MEOH, Na₂S₂O₃ (CF)

aClientID Merrimack Station - Coal Ash
nProjectID 3949 nYearMonth 2020.11

Client (Pro Mgr) Allan Palmer

Customer Granite Shore Power
Address 431 River Road
City Bow NH 03304
Phone 230-7997

Fax

Results Needed by: Preferred date _____
Notes about project _____

Reporting Options
 HC NO FAX EDD Disk
 Fax No partial FAX EDD email

PO# _____

Samples Collected by: SLT/TC/EA1

Temperature 3.1 °C

Relinquished by: [Signature] Date/Time 11/2/2020 15:40
Received by: [Signature]

Relinquished by _____ Date/Time _____ Received by _____