



Jervois Mining Limited Cobalt Operations

Point of Compliance Update and Determination

Executive Summary

The Idaho Cobalt Operation (ICO) is a proposed underground cobalt mine owned and managed by Jervois Mining Limited (“Jervois”) in Lemhi County, Idaho. A ground water Points of Compliance (POC) determination was approved in 2011. The Idaho Department of Environmental Quality (DEQ) required the installation of numerous compliance and indicator wells and required monitoring for dissolved and total copper. Copper Upper Tolerance Limits (UTLs) were developed to characterize existing water quality conditions and allow ICO operations while not impacting the Blackbird Mine remediation activities occurring within the same watershed.

In 2018, DEQ initiated a revision of the POC for the incorporation of new information and changes at the site since 2011. The changes from 2011 to 2020 include: removal of certain redundant wells; removal of dissolved copper as a constituent of concern; and inclusion of other constituents of concern. A detailed accounting of the changes follows in the section titled, “Modification of the POC from 2011 to 2020.”

Purpose and Background

Jervois (ICO) received a Point of Compliance (POC) for ground water in March 22, 2011 (http://www.deq.idaho.gov/media/583591-idaho_cobalt_project_poc.pdf); this POC was issued to Formation Metals, Inc. Jervois merged with Formation Metal’s parent company, eCobalt in July 2019.

This POC established indicator and capture wells within the Bucktail watershed to prevent mineralized ground water flowing into Bucktail Creek in volumes which would interfere or interrupt remedial actions at the adjoining Blackbird Mine Site, a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) site. Blackbird Mine has in-stream water quality targets immediately downstream of the ICO. Capture wells are also located in the Big Flat area east of the Bucktail watershed.

The 2011 POC outlined sampling and analysis, upper tolerance limits for copper contamination and outlined five conditions to ensure the POC met the Ground Water Quality Rule (IDAPA 58.01.11). The Idaho Department of Environmental Quality conducted a 30-day comment period and solicited comments from known interested parties: the Environmental Protection Agency, Region X, United States Forest Service Salmon-Challis National Forest, the Blackbird Mine Site Group (BMSG). Comments were also received from the Idaho Mining Association. When issued, the POC relied on future monitoring plans, statistical calculations and well construction for full implementation.

From approval until initiation of the POC review, ICO went through multiple development and maintenance phases in accordance with the United States Forest Service (USFS) approved Plan of Operations (“Plan”). These actions led to the Idaho Department of Environmental Quality’s (DEQ) initiation of the POC revision in 2018. Active mining has not started and the facility is in care and maintenance mode until construction season, currently estimated as June 2021.

Introduction

The ICO is located approximately 45 road miles west from Salmon, Idaho, or 22 direct miles. Salmon is the county seat for Lemhi County and has a population of approximately 3,250 people. The Project is centered at 45.130556 latitude, -114.361667 longitude. The ICO consists of 241 unpatented mining claims comprising 4,080 acres. Ground water exhibits areas of elevated levels of copper and other minerals present in areas of historical impacts; however mineralized areas proposed for mining by ICO do not exceed the ground water quality standards of 1.3 mg/L total copper. Through the approved Plan, Jervois updated their well development, sample and analysis plans. Existing quality of ground water was determined consistent with the IDAPA 58.01.11.401.03 and updated concentrations were calculated (Newfields 2018, 2020) using UTLs and Interim Decision Thresholds (IDT) following DEQ Statistical Guidance for Determining Background Ground Water Quality and Degradation (2014). Appendix A contains a site map and approximate locations of all compliance and indicator wells.

Modification of the POC from 2011 to 2020

In February 2019, DEQ agreed to revisions of ICO Operational Monitoring Plan, which outlined reduced sampling and, for POC purposes, abandoning POC capture and POC indicator wells. Table 1 in Appendix B displays discontinued POC wells.

In addition to the modifications outlined at specific wells, Jervois proposed to add numerous other constituents of concern to the POC. The constituent list, approved sampling schedule and associated UTL calculations and are found in the Appendix B, Table 2, and Table 3. Jervois also modified seasonal sampling due to harsh conditions found at the site in the winter months.

Lastly, the proposed 2020 POC removes sampling for dissolved copper in all wells and only requires total copper analysis, along with the new constituents previously identified.

Background Values for Ram and Big Flat Areas

Appendix B contains all UTL, Alternative Concentration Limits (ACL), and IDT values for the revised POC.

Ground Water Monitoring Plan

Ground water monitoring for POC use is outlined in the USFS approved plan, Interim Water Monitoring Plan, dated April, 2020.

Annual Report

The Plan of Operations requires Jervois submit an annual report by March of each year. Unless noted below in POC Response Plan, the submitted annual report will count as meeting the annual POC reporting requirement. The annual report is to include a summary of data collected the prior year, discussion of any anomalous or unexpected data, and all available validated water quality data from all POC and indicator wells in an electronic, editable format (e.g. Excel, .txt). Identification of any possible data gaps, unanticipated changes in water quality, changes in site conditions, or other modifications should also be presented and discussed. As such, DEQ will determine, based upon the information submitted, Jervois' compliance with the Idaho Ground Water Quality Rule and the effectiveness of the Best Management Practices (BMPs) for the mine activities. The report should identify proposed or approved background concentrations at the

monitoring locations identified in the POC along with ground water quality standards listed in the Idaho Ground Water Quality Rule.

Monitoring Constituents

As noted, the additions of the constituents are a change from the original POC and are outlined in the table below. The 2011 POC only required monitoring of dissolved and total copper. The 2020 POC revision includes all constituents identified for ground water as Appendix B.

Monitoring Schedule

The current Interim Water Monitoring Plan (Jervois, 2020) contains specific details for sampling. The monitoring is summarized in Appendix B.

POC Well Background Analysis

Jervois will update any UTL or IDT when an adequate number of samples for each individual well. In addition, UTL or IDT may be revised every five (5) years from the date of POC issuance if supported by analytical data and the conceptual site model.

Data Summary Notice

If data indicate ground water quality exceeds any UTL or IDT, Jervois will prepare a data summary notice and submit to DEQ within 60 days of the event.

POC Response Plan

Jervois will prepare for DEQ review and approval a Point of Compliance Response Plan which, at a minimum, will provide the current monitoring plan, sampling location, UTL/IDT for each well, and a catalog of potential BMPs Jervois may implement if an exceedance of the current UTLs and/or IDTs occurs. The Response Plan must be updated annually and delivered to DEQ by March 1 of each calendar year after POC issuance. Version 1.0 of the POC Response Plan will be delivered to DEQ within 90 days of the POC issuance. In addition to the requirements above, Version 1.0 must address POC and Indicator wells with increasing secular trends (BFW09, RCW01, RCW04, RCW09, RMW07, RMW09).

Right to Appeal Final Determination

This final Point of Compliance Revised Determination may be appealed by submitting a petition to initiate a contested case, pursuant to Idaho Code §39-107(5), and the Rules of Administrative Procedure before the Board of Environmental Quality (IDAPA 58.01.23), within 35 days of the date of final revised determination.

Summary of Public Comments

DEQ will conduct a minimum of 30-day public comment period and additionally specifically request comments from: the Environmental Protection Agency, Region X, United States Forest Service Salmon-Challis National Forest, the Blackbird Mine Site Group. A response to comments document will be appended to the final POC as an Appendix C: Response to Comments.

References

Idaho Department of Environmental Quality, Ground Water Quality Rule (IDAPA 58.01.11, et seq.

Idaho Department of Environmental Quality, 2014. Statistical Guidance for Determining Background Ground Water Quality and Degradation

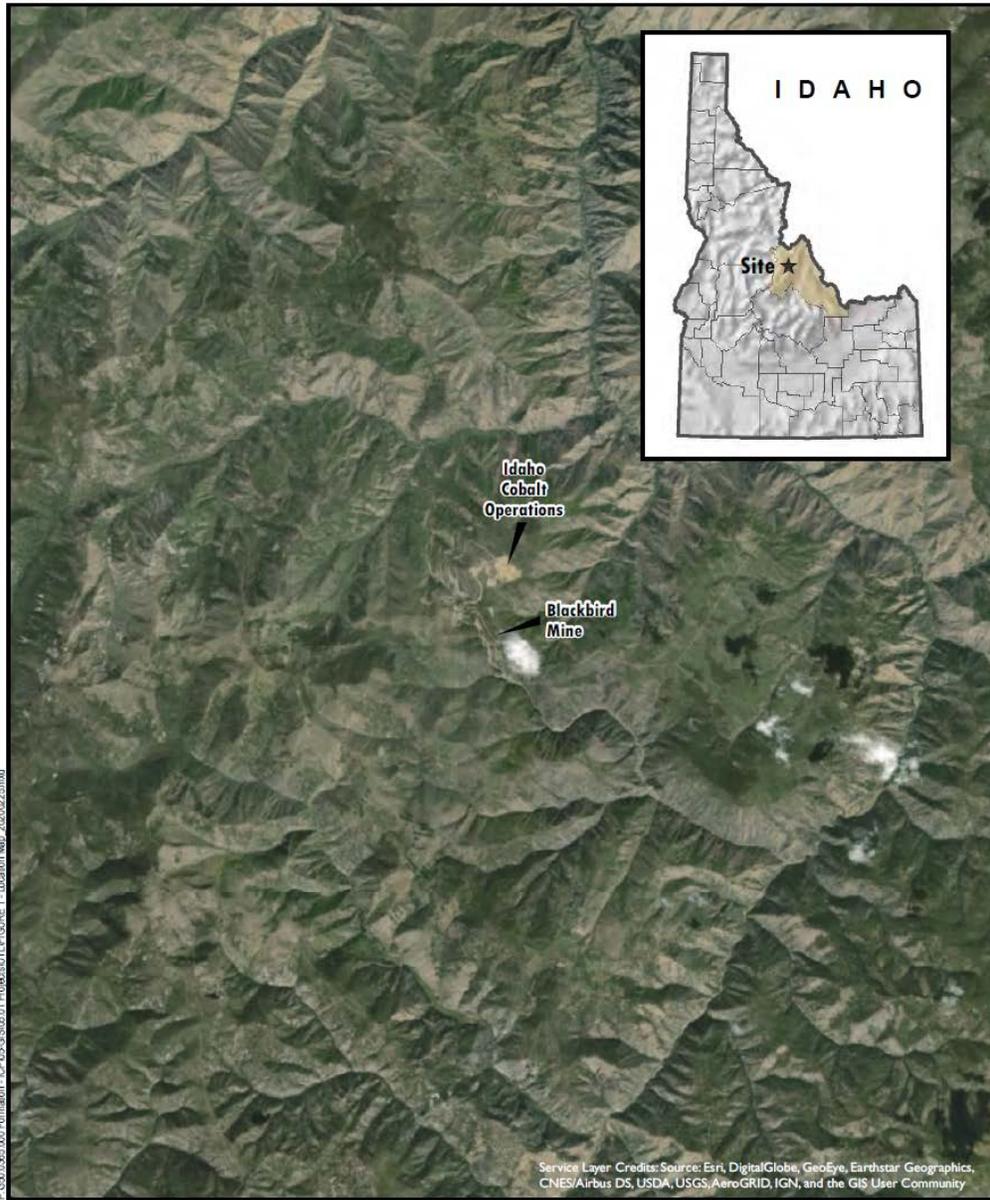
Jervois Mining Limited, April, 2020. 2020 Interim Water Monitoring Plan

Newfields, July, 2020. ICL UTL Update Memorandum

Newfields, November, 2018, Upper Tolerance Limits and Intermediate Thresholds, Idaho Cobalt Project, Lemhi County, Idaho.

Appendix A. Figures

(Figures from Newfields, 2020)

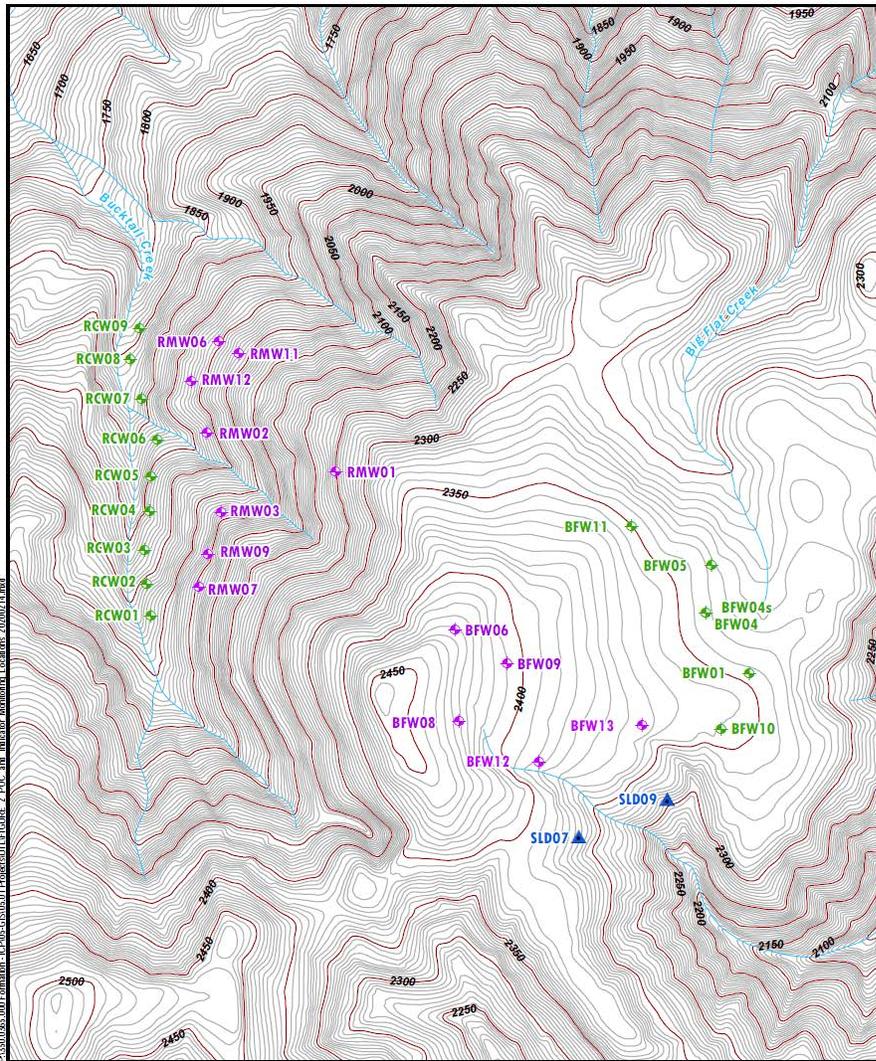


P:\3501.0365.000-Formation - CP2005-5-SR06.01-Proceeds\UTL\FIGURE 1 - Location Map_20200225.mxd



Location Map
Idaho Cobalt Operations
Lemhi County, Idaho
FIGURE 1

Figure 1 Idaho Cobalt Operations Location



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- ✚ POC Well
 - ✚ Indicator Well
 - ▲ POC/Surface Water Monitoring Location
- Note: Well locations are approximate.

POC and Indicator Monitoring Locations
 Idaho Cobalt Operations
 Lemhi County, Idaho
 FIGURE 2

Figure 2 Ground Water Well Locations, ICO

Appendix B. Tables

(Tables 2-5 From Jervois, 2020 and Newfields, 2020)

Table 1 POC Indicator Wells Removed from POC and Operational Water Monitoring Plan

POC Indicator Wells Removed from POC and Operational Water Monitoring Plan	
Well	Rationale
RMW-10	Redundant with RMW-11 and outside of the critical POC flowpath
RMW-8	Redundant with RMW-2 and have overlapping well screening
RMW-13	Redundant critical POC flowpath as RMW-7
RMW-14	Redundant critical POC flowpath as RMW-7
RMW-3	Downgradient of POC well BFMW-11
RMW-6	Redundant critical POC flowpath as RMW-5a
RMW-7s	Redundant critical POC flowpath as RMW-7d

Table 2 Well Sampling Schedule

Original Location ID	Updated Location ID	Location Type	Notes	Category ^a											
				Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
BFMW-1a	BFW01	Compliance Point	ACL and/or IDT for any parameter					1		1		1		1	
BFMW-4d	BFW04	Compliance Point	ACL and/or IDT for any parameter					1		1		1		1	
BFMW-4s	BFW04s	Compliance Point	SWL monitoring only					SWL		SWL		SWL		SWL	
BFMW-5a	BFW05	Compliance Point	ACL and/or IDT for any parameter					1		1		1		1	
BFMW-10	BFW10	Compliance Point	ACL and/or IDT for any parameter					1		1		1		1	
BFMW-11	BFW11	Compliance Point	No ACL or IDT for any parameter					SWL		SWL		SWL		SWL	
RCW-1	RCW01	Compliance Point	ACL and/or IDT for any parameter					1		1		1		1	
RCW-2	RCW02	Compliance Point	No ACL or IDT for any parameter					SWL		SWL		SWL		SWL	
RCW-3	RCW03	Compliance Point	ACL and/or IDT for any parameter					1		1		1		1	
RCW-4	RCW04	Compliance Point	ACL and/or IDT for any parameter					1		1		1		1	
RCW-5	RCW05	Compliance Point	No ACL or IDT for any parameter					SWL		SWL		SWL		SWL	
RCW-6, RCW-6a	RCW06	Compliance Point	ACL and/or IDT for any parameter					1		1		1		1	
RCW-7d	RCW07	Compliance Point	ACL and/or IDT for any parameter					1		1		1		1	
RCW-8	RCW08	Compliance Point	ACL and/or IDT for any parameter					1		1		1		1	
RCW-9	RCW09	Compliance Point	ACL and/or IDT for any parameter					1		1		1		1	
SS-7, P52	SLD07	Compliance Point	ACL and/or IDT for any parameter					1	1 ^b						
SS-9, Q52	SLD09	Compliance Point	ACL and/or IDT for any parameter					1	1 ^b						
BFMW-6	BFW06	Indicator Monitoring Well	No ACL or IDT for any parameter					SWL		SWL		SWL		SWL	
BFMW-8	BFW08	Indicator Monitoring Well	ACL and/or IDT for any parameter					1		1		1		1	
BFMW-9	BFW09	Indicator Monitoring Well	ACL and/or IDT for any parameter					1		1		1		1	
BFMW-12	BFW12	Indicator Monitoring Well (adjacent to SLD07)	ACL and/or IDT for any parameter					1	1 ^c						
BFMW-13	BFW13	Indicator Monitoring Well (adjacent to SLD09)	ACL and/or IDT for any parameter					1	1 ^c						
RMW-1	RMW01	Indicator Monitoring Well	No ACL or IDT for any parameter					SWL		SWL		SWL		SWL	
RMW-2	RMW02	Indicator Monitoring Well	ACL and/or IDT for any parameter					1		1		1		1	
RMW-3	RMW03	Indicator Monitoring Well (in need of repair)	No ACL or IDT for any parameter					SWL		SWL		SWL		SWL	
RMW-6	RMW06	Indicator Monitoring Well	ACL and/or IDT for any parameter					1		1		1		1	
RMW-7	RMW07	Indicator Monitoring Well	ACL and/or IDT for any parameter					1		1		1		1	
RMW-9a	RMW09	Indicator Monitoring Well	ACL and/or IDT for any parameter					1		1		1		1	
RMW-11	RMW11	Indicator Monitoring Well	No ACL or IDT for any parameter					SWL		SWL		SWL		SWL	
RMW-12	RMW12	Indicator Monitoring Well	ACL and/or IDT for any parameter					1	1 ^d	1		1		1	
SS-11, RS1	SRG11	2020 Seep/Spring Monitoring Location						2	2			2			
SS-5	SBF05	2020 Seep/Spring Monitoring Location						2	2			2			
WQ-7	GFP07	2020 Surface Water Monitoring Location						2	2			2			
WQ-10	ORG10	2020 Surface Water Monitoring Location						2	2			2			
WQ-11	ORC11	2020 Surface Water Monitoring Location						2	2			2			
WQ-14	OLD14	2020 Surface Water Monitoring Location						2	2			2			
WQ-18	OBT18	2020 Surface Water Monitoring Location						2	2			2			
WQ-24a	QBD24 ^e	Upstream of NPDES Outfall 001						4	2	F&H		4		F&H	
WQ-30	QBD30 ^e	Downstream of NPDES Outfall 001						4	2	F&H		4		F&H	

^a Categories correspond to analytical constituent suites

^b Additional sampling events added at SLD07 and SLD09 compliance points to correspond with additional sampling occurring at BFW12 and BFW13

^c Additional sampling events added at BFW12 and BFW13. NewFields (2020) analysis indicated that 9 samples would be needed to calculate a UTL; proposed monitoring plan includes 8 sampling events in 2020 and 1 additional sampling event in 2021.

^d Additional sampling events added at RMW12. NewFields (2020) analysis indicated that 5 samples would be needed to calculate a UTL; proposed monitoring plan includes 5 sampling events in 2020.

^e Permit ID: ID-002832-1. Sample locations QBD24 and QBD30, which are located upstream and downstream, respectively, of permitted Outfall 001, will be sampled quarterly, as required by the NPDES permit.

SWL: Static water level monitoring only
F&H: Flow and hardness monitoring only

Table 3 Constituents List and Relevant Sampling Category

Jervois Mining USA Limited - Idaho Cobalt Operations								(Revised 4/09/2020)
Interim Monitoring Constituent Categories								
Constituent	Maximum MDL ^a (mg/L)	Lab RL ^b (mg/L)	Category					
			1	2	3	4	5	
Non-Metals								
pH, Laboratory (s.u.)		0 - 0.1	X	X	X	X	X	
Sulfate	20	1	X	X	X	X	X	
Chloride	1.0	0.5	X	X	X	X	X	
Fluoride		0.05	X	X	X			
Alkalinity, Total as CaCO ₃		1	X	X	X	X	X	
Hardness, Total as CaCO ₃		1	X	X	X	X	X	
Total Dissolved Solids		10	X	X	X	X	X	
Total Suspended Solids	5	pending	X	X	X	X	X	
Nitrogen, Nitrate plus Nitrite as N	0.01	0.01	X	X	X	X	X	
Nitrogen, Ammonia as N	1.0	0.05	X	X	X	X	X	
Organic Carbon, Dissolved		pending	X	X	X	X	X	
Metals								
Aluminum - D		0.02		X	X			
Aluminum - T	0.02	0.02		X	X	X	X	
Antimony - D		0.0005			X			
Antimony - T		0.0005			X			
Arsenic - D	0.0020	0.002	X	X	X		X	
Arsenic - T		0.002	X	X	X	X		
Barium - D		0.01			X			
Barium - T		0.01			X			
Beryllium - D		0.001			X			
Beryllium - T		0.001			X			
Cadmium - D	0.0001	0.0001		X	X		X	
Cadmium - T		0.0001		X	X	X		
Cobalt - D		0.002	X	X	X			
Cobalt - T	0.0020	0.002	X	X	X	X	X	
Copper - D	0.0010	0.001	X	X	X	X	X	
Copper - T		0.001	X	X	X	X	X	
Iron - D		0.03	X	X	X			
Iron - T	0.03	0.03		X	X	X	X	
Lead - D	0.0001	0.0001		X	X		X	
Lead - T		0.0001		X	X	X		
Manganese - D		0.005		X	X			
Manganese - T		0.005		X	X	X		
Mercury - D		0.0002		X	X			
Mercury - D (ULL)								
Mercury - T		0.0002		X	X			
Mercury - T (ULL)	0.0000002	pending				X (ASL Lab)	X (ASL Lab)	
Nickel - D	0.0050	0.001	X	X	X		X	
Nickel - T		pending	X	X	X	X		
Selenium - D		0.001		X	X			
Selenium - T	0.0020	0.001		X	X	X	X	
Silver - D	0.0002	0.0001		X	X		X	
Silver - T		0.0001		X	X			
Thallium - D		0.0003			X			
Thallium - T	0.0003	0.0003			X	X	X	
Zinc - D	0.0100	0.005	X	X	X		X	
Zinc - T		pending	X	X	X	X		
Major Ions								
Calcium - D		0.05	X	X	X			
Magnesium - D		0.1	X	X	X			
Potassium - D		2	X	X	X			
Sodium - D		2	X	X	X			
Field Parameters								
Flow (gpm)/Static water level (ft)			X	X	X	X	X	
Dissolved Oxygen			X	X	X	X	X	
Temperature (°C)			X	X	X	X	X	
Conductivity (mS/m)			X	X	X	X	X	
pH (s.u.)			X	X	X	X	X	
Turbidity (NTU)			X	X	X			

^a: Maximum MDL values listed in NPDES Permit ID-002832-1, Table 2.
^b: Reporting limits provided 11/26/2019 from Energy Laboratories
D: Dissolved
gpm: gallons per minute
mS/m: millisiemens per meter
NTU: nephelometric turbidity units
s.u.: standard units
T: Total
ULL: Ultra low-level

Table 4 Proposed Upper Threshold Limits and Alternative Concentration Limits

Table 4. Proposed Upper Threshold Limits and Alternative Concentration Limits for Monitoring Locations

Monitoring Location	Original Location ID	Type	Arsenic, Total (µg/L)	Method	Cobalt, Total (µg/L)	Method	Copper, Total (µg/L)	Method	Nickel, Total (µg/L)	Method	Zinc, Total (µg/L)	Method	Nitrogen, Nitrate-Nitrite (mg/L as Nitrogen)	Method	Sulfate (mg/L as SO ₄)	Method	Arsenic, Dissolved (µg/L)	Method	Cobalt, Dissolved (µg/L)	Method	Copper, Dissolved (µg/L)	Method	Nickel, Dissolved (µg/L)	Method	Zinc, Dissolved (µg/L)	Method
BFW01	BFMW-1/BFMW-1a	POC	6.8	2*	6.0	6	67.0	6	2.0	3	18.3	2	0.189	1*	2.0	6*	NA		NA		NA		NA		NA	
BFW04	BFMW-4d	POC	10.0	6	2.0	4	24.3	1*	2.0	3	17.0	3	0.185	1*	1.0	3*	NA		NA		NA		NA		NA	
BFW05	BFMW-5a	POC	642.1	5	52.6	1	830.1	1	28.7	5	29.2	2	0.173	1	IDT		NA		NA		NA		NA		NA	
BFW06	BFMW-6	Indicator	1.5	4	6.0	6	30.0	1	1.0	7	5.5	3	0.185	6	1.0	3	NA		NA		NA		NA		NA	
BFW08	BFMW-8	Indicator	2.0	7	5.5	2	IDT		11.3	2	12.2	2	0.369	1	2.0	3	NA		NA		NA		NA		NA	
BFW09	BFMW-9	Indicator	IDT		70.0	5	433.6	4	23.5	2	35.4	2*	0.170	2	1.0	3	NA		NA		NA		NA		NA	
BFW10	BFMW-10	POC	9.8	1	11.2	2	42.7	4	23.1	2	17.0	6	0.327	5	IDT		NA		NA		NA		NA		NA	
BFW11	BFMW-11	POC	29.7	1	268.3	5	985.5	5	35.9	1	124.9	5	0.078	1*	1.0	7	NA		NA		NA		NA		NA	
BFW12	BFMW-12	Indicator	2.0	8a	4.8	2	IDT		2.5	8a	10.0	8b	0.041	2	3.0	3	NA		NA		NA		NA		NA	
BFW13	BFMW-13	Indicator	86.0	8a	571.0	5	668.6	5	153.0	8a	100.0	8a	0.056	2	19.8	1	NA		NA		NA		NA		NA	
RCW01	RCW-1	POC	13.0	6	2.0	3	5.5	2	5.0	7	101.8	1	0.569	1*	296.1	1*	NA		NA		NA		NA		NA	
RCW02	RCW-2	POC	2.0	3	2.0	7	1.0	3	5.0	7	110.0	6	0.150	6	174.0	1	NA		NA		NA		NA		NA	
RCW03	RCW-3	POC	3.0	3	3.0	3	17.0	5	5.0	7	123.2	2	1.080	6*	159.1	1*	NA		NA		NA		NA		NA	
RCW04	RCW-4	POC	1.0	8b	IDT		70.0	6*	5.0	8b	80.0	8a	IDT		IDT		NA		NA		NA		NA		NA	
RCW05	RCW-5	POC	3.9	2	57.2	1	127.6	6	5.0	7	74.8	2	1.053	1	44.3	6	NA		NA		NA		NA		NA	
RCW06	RCW-6, RCW-6A	POC	7.6	2	49.2	1*	192.1	6	5.0	7	10.0	3	1.664	1*	51.6	1	NA		NA		NA		NA		NA	
RCW07	RCW-7d	POC	3.0	6	IDT		35.6	5*	5.0	7	580.5	5	0.397	1*	IDT		NA		NA		NA		NA		NA	
RCW08	RCW-8	POC	11.0	6	180.8	1	25.8	5	9.0	3	60.0	6	0.230	1*	58.2	1	NA		NA		NA		NA		NA	
RCW09	RCW-9	POC	3.0	6	IDT		3.0	6	5.0	7	110.9	2	0.615	6*	IDT		NA		NA		NA		NA		NA	
RMW01	RMW-1	Indicator	4.4	2	62.0	1	9.2	1	2.0	3	6.0	7*	0.283	1	5.0	6	NA		NA		NA		NA		NA	
RMW02	RMW-2	Indicator	14.1	2*	1.2	2	9.3	4	1.0	3	9.0	3	0.050	6*	34.0	6	NA		NA		NA		NA		NA	
RMW03	RMW-3	Indicator	10.0	6	184.0	1	90.6	1	5.0	6	14.0	3	0.336	1*	25.0	6	NA		NA		NA		NA		NA	
RMW05	RMW-6	Indicator	18,704	1*	293.0	6	347.2	1*	5.0	6*	59.1	1*	0.111	2*	27.0	6*	NA		NA		NA		NA		NA	
RMW07	RMW-7	Indicator	10.0	6	93.5	6	IDT		5.0	6	45.4	1*	0.835	1	35.0	6	NA		NA		NA		NA		NA	
RMW09	RMW-9a	Indicator	2.0	7	IDT		54.5	1	5.0	6	10.0	7	0.351	1	24.0	8a	NA		NA		NA		NA		NA	
RMW11	RMW-11	Indicator	3.0	6	65.0	6	11.4	1	2.1	2	10.0	7	0.162	1	10.0	6	NA		NA		NA		NA		NA	
RMW12	RMW-12	Indicator	18.0	8a	2.0	8b	3.0	8a	2.0	8a	6.0	8b	0.025	8a	18.0	8a	NA		NA		NA		NA		NA	
SLD07	SS-7, PS2	POC	NA		NA		NA		NA		NA		1.046	5*	IDT		2.26	2	4.31	2	5.32	1	2	3	22	3
SLD09	SS-9, QS2	POC	NA		NA		NA		NA		NA		IDT		3.1	2	2.11	2	4.31	2	5.49	1	1	3	17	3

Notes:

- (1) - Normal 95% UTL with 95% coverage
- (2) - 95% Kaplan-Meier UTL with 95% coverage
- (3) - Maximum detected value
- (4) - Lognormal 95% UTL with 95% coverage
- (5) - 95% Wilson Hiferty approximate gamma UTL with 95% coverage
- (6) - Non-parametric 95% UTL with 95% coverage
- (7) - Insufficient data to calculate UTL - all values were non-detect. Maximum laboratory reporting limit listed.
- (8) - Insufficient data to calculate UTL. Alternative concentration limit (ACL) calculated:
 - (8a) - ACL = maximum detected concentration
 - (8b) - ACL = maximum laboratory reporting limit

* - A trend was identified in the entire dataset but has stabilized; UTL calculated from the 12 most recent data points.

IDT - interim decision threshold proposed because data exhibits secular trend. Refer to Table 5.

UTL - upper threshold limit

NA - not applicable or not available if no samples have been collected.

POC - Point of Compliance

µg/L - micrograms per liter

mg/L - milligrams per liter

Outlier value was removed from dataset.

Data is seasonally adjusted.

A secular trend was identified but the Sen slope = 0. A UTL was calculated.

Table 5 Proposed Interim Decision Thresholds

Table 5. Proposed Interim Decision Thresholds for Monitoring Locations Exhibiting a Secular Trend

Monitoring Location	Original Location ID	Constituent of Concern	Type	Trend	Sen's Slope	LCL	UCL	IDT ¹
BFW05	BFMW-5a	Sulfate (mg/L)	POC	Decreasing	-5.37E-04	-6.77E-04	0.00E+00	0.00E+00
BFW08	BFMW-8	Copper, Total (µg/L)	Indicator	Decreasing	-1.38E-03	-2.74E-03	0.00E+00	0.00E+00
BFW09	BFMW-9	Arsenic, Total (µg/L)	Indicator	Increasing	5.09E-04	0.00E+00	8.94E-04	0.00E+00
BFW10	BFMW-10	Sulfate (mg/L)	POC	Decreasing	-7.32E-04	-1.06E-03	-4.84E-04	-4.84E-04
BFW12	BFMW-12	Copper, Total (µg/L)	Indicator	Decreasing	-9.64E-03	-3.71E-02	-2.45E-03	-2.45E-03
BFW12	BFMW-12	Sulfate (mg/L)	Indicator	Decreasing	0.00E+00	0.00E+00	0.00E+00	NA
RCW01	RCW-1	Arsenic, Total (µg/L)	POC	Increasing	0.00E+00	0.00E+00	5.84E-03	NA
RCW04	RCW-4	Cobalt, Total (µg/L)	POC	Increasing	5.36E-03	0.00E+00	7.48E-03	0.00E+00
RCW04	RCW-4	Nitrogen, Nitrate-Nitrite (mg/L)	POC	Increasing	1.19E-04	8.88E-05	1.60E-04	8.88E-05
RCW04	RCW-4	Sulfate (mg/L)	POC	Decreasing	-1.18E-02	-1.87E-02	-4.12E-03	-4.12E-03
RCW07	RCW-7d	Cobalt, Total (µg/L)	POC	Increasing	2.81E-03	6.60E-04	5.51E-03	6.60E-04
RCW07	RCW-7d	Sulfate (mg/L)	POC	Decreasing	-6.33E-04	-1.33E-03	0.00E+00	0.00E+00
RCW09	RCW-9	Cobalt, Total (µg/L)	POC	Increasing	2.59E-03	1.06E-03	5.34E-03	1.06E-03
RCW09	RCW-9	Sulfate (mg/L)	POC	Decreasing	-3.96E-03	-6.15E-03	-1.12E-03	-1.12E-03
RMW07	RMW-7	Copper, Total (µg/L)	Indicator	Increasing	3.17E-03	1.98E-03	4.58E-03	1.98E-03
RMW09	RMW-9a	Cobalt, Total (µg/L)	Indicator	Increasing	1.65E-02	0.00E+00	3.29E-02	0.00E+00
SLD07	SS-7, PS2	Sulfate (mg/L)	POC	Decreasing	-2.13E-04	-2.50E-04	0.00E+00	0.00E+00
SLD09	SS-9, QS2	Nitrogen, Nitrate-Nitrite (mg/L)	POC	Decreasing	-1.36E-05	-4.05E-05	-9.31E-06	-9.31E-06
SLD09	SS-9, QS2	Sulfate (mg/L)	POC	Decreasing	0.00E+00	-2.67E-04	0.00E+00	NA

¹Lower tolerance level was used for increasing trends and upper tolerance level was used for decreasing trends.

Notes: µg/L = micrograms per liter; mg/L = milligrams per liter; POC = Point of Compliance; LCL = 95% Lower Confidence Limit; UCL = 95% Upper Confidence Limit; IDT = Interim Decision Threshold.

NA A secular trend was identified but the Sen slope = 0. A UTL was calculated (see Table 4).

Appendix C. Response to Comments

(Completed after 30-day public comment period)