DATA VALIDATION REPORT

August 2016 Groundwater Sampling Event
Four Corners Power Plant, Arizona Public Service
Farmington, New Mexico

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ACRONYMS

%	percent
Amec Foster Wheeler	Amec Foster Wheeler Environment & Infrastructure, Inc.
APS	Arizona Public Service
CCR	coal combustion residual
CLP	Contract Laboratory Program
COC	chain of custody
EPA	United States Environmental Protection Agency
ID	identification
LCS	laboratory control sample
LCSD	laboratory control sample
MCL	maximum contaminant level
mg/L	milligrams per liter
MS	matrix spike
MSD	matrix spike duplicate
QC	quality control
RL	reporting limit
RPD	relative percent difference
SAP	sampling and analysis plan
SM	Standard Method
TestAmerica	TestAmerica Laboratories, Inc.
TDS	total dissolved solids

DATA VALIDATION REPORT
Four Corners Power Plant, Arizona Public Service
Farmington, New Mexico

1.0 INTRODUCTION

Arizona Public Service (APS) collected 18 water samples August 20 and 21, 2016, from the Four Corners Power Plant, located in Farmington, New Mexico. APS submitted the samples to TestAmerica Laboratories, Inc. (TestAmerica), located in Phoenix, Arizona, where they were assigned to sample delivery groups 550-68449, 550-68450-1, and 550-68451. TestAmerica analyzed the samples for total metals by United States Environmental Protection Agency (EPA) Methods 200.7, 200.8, and 245.1; anions by EPA Method 300.0; total dissolved solids (TDS) by Standard Method (SM) 2540C; and pH by SM 4500B. TestAmerica subcontracted the samples to Radiation Safety Engineering, Inc., where they were analyzed for radium 226/228 by EPA method 903.1/904. A list of these samples by field sample identification (ID), sample collection date, and the laboratory sample IDs is presented in Table 1.

2.0 DATA VALIDATION METHODOLOGY

Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler) performed an EPA Stage 2A validation on these samples, which is equivalent to a Level I data evaluation as defined in the project sampling and analysis plan (SAP). The Stage 2A validation includes review of the quality control (QC) results in the laboratory's analytical report and does not include review or validation of the raw analytical data. This data validation report also does not include review or validation of the data from Radiation Safety Engineering, Inc. due to the lack of QC data. This data validation has been performed in general accordance with:

- AECOM, Inc., 2015. Final Sampling and Analysis Plan Coal Combustion Residual (CCR) Groundwater Monitoring, Four Corners Power Plant, Arizona Public Service, Farmington, New Mexico, December 2015.
- EPA, 2004. SW 846 Test Methods for Evaluating Solid Wastes, Update IIIB.
- EPA, 2014. EPA Contract Laboratory Program (CLP) National Functional Guidelines for Inorganic Superfund Data Review, EPA-540 R 013 001.

The CLP guidelines were written specifically for the CLP, and have been modified for the purposes of this data review where they differ from method-specific QC requirements.

The laboratory's certified analytical report and supporting documentation were reviewed to assess the following:

- Data package and electronic data deliverable completeness;
- Chain of custody (COC) compliance;
- Holding time compliance;
- Presence or absence of laboratory contamination as demonstrated by laboratory blanks;
- Accuracy and bias as demonstrated by recovery of laboratory control sample (LCS) and matrix spike (MS) samples;
- Analytical precision as relative percent difference (RPD) of analyte concentration between laboratory duplicates, LCS/LCS duplicates (LCSDs), or MSs/MS duplicates (MSDs);
- Insofar as possible, the degree of conformance to method requirements and good laboratory practices.

In general, it is important to recognize that no analytical data are guaranteed to be correct, even if all QC audits are passed. Strict QC serves to increase confidence in data, but any reported value may potentially contain error.

3.0 EXPLANATION OF DATA QUALITY INDICATORS

Summary explanations of the specific data quality indicators reviewed during data validation are presented below.

3.1 LABORATORY CONTROL SAMPLE RECOVERIES

LCSs are aliquots of analyte free matrices that are spiked with the analytes of interest for an analytical method, or a representative subset of those analytes. The spiked matrix is then processed through the same analytical procedures as the samples they accompany. LCS recovery is an indication of a laboratory’s ability to successfully perform an analytical method in an interference free matrix.

3.2 MATRIX SPIKE RECOVERIES

MSs and MSDs are prepared by adding known amounts of the analytes of interest for an analytical method, or a representative subset of those analytes, to an aliquot of sample. The spiked sample is then processed through the same extraction, concentration, cleanup, and analytical procedures as the unspiked samples in an analytical batch.

MS recovery and precision are an indication of a laboratory's ability to successfully recover an analyte in the matrix of a specific sample or closely related sample matrices. It is important not to apply MS results for any specific sample to other samples without understanding how the sample matrices are related.

3.3 BLANK CONCENTRATIONS

Blank samples are aliquots of analyte free matrix that are used as negative controls to verify that the sample collection, storage, preparation, and analysis system does not produce false positive results.

Laboratory blanks are processed by the laboratory using exactly the same procedures as the field samples. Target analytes should not be found in laboratory blanks.

When target analytes are detected in blanks, analyte concentrations in associated samples less than five times the concentration detected in the blank will be U qualified as being not detected.

3.4 LABORATORY AND FIELD DUPLICATES

Laboratory and field duplicate analysis verifies acceptable method precision by the laboratory at the time of preparation and analysis and/or sampling precision at the time of collection.

4.0 DEFINITIONS OF QUALIFIERS THAT MAY BE ADDED DURING DATA VALIDATION

J The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.

R The sample result is rejected due to serious deficiencies in the ability to analyze the sample and meet quality control criteria. The presence or absence of the analyte cannot be verified.

U The analyte was analyzed for, but was not detected above the reported sample quantitation limit.

UJ The analyte was not detected above the reported sample quantitation limit. However, the reported quantitation limit is approximate and may or may not represent the actual limit of quantitation necessary to accurately and precisely measure the analyte in the sample.

5.0 QUALIFICATION REASON CODES

The following reason code was applied to the data during data validation:

HT Holding time exceeded.

6.0 CHAIN OF CUSTODY AND SAMPLE RECEIPT CONDITION DOCUMENTATION

The samples were received at the laboratories under proper COC, intact, properly preserved, and at temperatures less than the SAP-specified maximum of 6 degrees Celsius.

7.0 SPECIFIC DATA VALIDATION FINDINGS

Results from these samples may be considered usable with the limitations and exceptions described in Sections 7.1 through 8.0.

7.1 METALS BY EPA METHODS 200.7, 200.8, AND 245.1

Total metals and mercury results generated by TestAmerica may be considered fully usable without qualification.

7.1.1 Holding Times

All samples were analyzed for metals within the SAP-specified holding time of 28 days for mercury and 180 days for the additional metals.

7.1.2 Laboratory Blanks

Target analytes were not detected in the laboratory blanks associated with the analysis of these samples.

7.1.3 Laboratory Control Samples

LCS recoveries were within the SAP-specified 80 to 120 percent (%) limits.

7.1.4 Matrix Spikes/Matrix Spike Duplicates

TestAmerica performed MS and MSD analyses on project sample FC-CCR-MW7-816 for mercury. MS/MSD recoveries were within the SAP-specified limits and RPDs between MS and MSD results were less than the SAP-specified maximum of 20%.

TestAmerica performed MS and MSD analyses on project sample FC-CCR-MW60-816 for beryllium, boron, calcium and lithium and FC-CCR-MW61-816 for beryllium and lithium. MS/MSD recoveries were within the laboratory-specified limits and RPDs between MS and MSD results were less than the laboratory-specified maximum of 20%, with the following exception:

- Boron recovery was low at 25% in the MS performed on sample FC-CCR-MW60-816. The boron concentration detected in the unspiked native sample, at 64 milligrams per liter (mg/L), was more than four times the spike concentration of 1.00 mg/L and it is not possible to assess data usability for this analyte based on MS recovery.

MS and MSD analyses for the other metals were performed on samples from an unrelated project and recovery and precision data are not applicable to the APS samples.

7.1.5 Analytical Sensitivity

Amec Foster Wheeler compared RLs (reporting limits) for antimony, arsenic, barium, beryllium, cadmium, chromium, selenium, thallium, and mercury against the National Primary Drinking Water Maximum Contaminant Levels (MCLs) to confirm that the RLs were sufficiently low to meet the MCLs. Nondetected results were reported to RLs less than the applicable MCLs.

7.1.6 Data Reporting and Analytical Procedures

There were no data anomalies associated with the metals analysis of these samples.

7.2 ANIONS BY EPA METHOD 300.0

Fluoride, chloride, and sulfate results generated by TestAmerica may be considered fully usable without qualification.

7.2.1 Holding Times

All samples were analyzed for anions within the SAP-specified holding time of 28 days.

7.2.2 Laboratory Blanks

Fluoride, chloride, and sulfate were not detected in the laboratory blanks associated with the analysis of these samples.

7.2.3 Laboratory Control Samples

LCS LCSD recoveries were within the laboratory-specified 90 to 110% limits and RPDs between the LCS and LCSD results were less than the laboratory-specified maximum values.

7.2.4 Matrix Spikes/Matrix Spike Duplicates

TestAmerica performed MS and MSD analyses on project sample FC-CCR-MW7-816 for chloride and fluoride and sample FC-CCR-MW64-816 for fluoride. Recoveries were within the laboratory-specified 80 to 120% limits and RPDs between MS and MSD results were less than 20%.

7.2.5 Laboratory Duplicates

TestAmerica did not perform duplicate analyses of any of the samples covered in this report and it is not possible to evaluate data usability based on duplicate precision of unrelated samples.

7.2.6 Analytical Sensitivity

Amec Foster Wheeler compared RLs for fluoride against the MCL to confirm that the RLs were sufficiently low to meet the MCL. Nondetected results were reported to RLs less than the applicable MCL.

7.2.7 Data Reporting and Analytical Procedures

There were no data anomalies associated with the fluoride, chloride, and sulfate analysis of these samples.

7.3 TOTAL DISSOLVED SOLIDS BY SM 2540C

TDS results generated by TestAmerica may be considered fully usable without qualification.

7.3.1 Holding Times

All samples were analyzed for TDS within the EPA-recommended holding time of 7 days.

7.3.2 Laboratory Blanks

TDS was not detected in the laboratory blanks at concentrations above the reporting limit.

7.3.3 Laboratory Control Sample Accuracy and Precision

LCS and LCSD recoveries were within the laboratory-specified 90 to 110% limits and RPDs between the LCS and LCSD results were less than the laboratory-specified maximum values.

7.3.4 Laboratory Duplicates

TestAmerica performed a duplicate analysis on project sample FC-CCR-MW7-816 and FC-CCR-MW68-816. RPD between source and duplicate result was less than laboratory-specified maximum of 10%.

7.3.5 Data Reporting and Analytical Procedures

There were no data anomalies associated with the TDS analysis of these samples.

7.4 pH BY SM 4500B

pH results generated by TestAmerica may be considered usable with the limitations described in Sections 7.4.1 through 7.4.4.

7.4.1 Holding Times

The laboratory noted that pH analysis was completed after the 15 minute hold time had expired. The samples were collected on August 20 and 21, 2016, but the samples were not analyzed for pH until August 23, 2016. Amec Foster Wheeler J qualified the pH results from the associated samples because of the missed hold times. (J-HT)

7.4.2 Laboratory Control Sample Accuracy

LCS recovery was within the laboratory-specified 98.5 to 101.5% limits.

7.4.3 Laboratory Duplicates

TestAmerica performed duplicate analyses on samples FC-CCR-MW65-816. RPDs between source and duplicate results were less than laboratory-specified maximum of 5%.

7.4.4 Data Reporting and Analytical Procedures

There were no data anomalies associated with the pH analysis of these samples.

7.5 RADIOCHEMICAL ANALYSES

It was not possible to evaluate data usability for the radiochemical analyses due to a lack of laboratory QC.

7.5.1 Analytical Sensitivity

Amec Foster Wheeler compared RLs for total radium analysis against the MCL to confirm that the RLs were sufficiently low to meet the MCL. Nondetected results were reported to RLs less than the applicable MCL.

8.0 FIELD DUPLICATES

Field duplicates were collected with samples FC-CCR-MW67-816 (FC-CCR-MW100-816) and FC-CCR-MW71-816 (FC-CCR-MW101-816). Target analyte detections are summarized in Table 2.

Precision values were less than the SAP-specified maximum of 20%, or the differences between the detected concentrations were less than the RLs, with the following exceptions:

- The RPD between chromium results from sample FC-CCR-MW67-816 and its field duplicate FC-CCR-MW100-816 was high at 46%. Amec Foster Wheeler J qualified the detected chromium results from these samples because of potential sampling or analytical imprecision. (J-FD)

9.0 SUMMARY AND CONCLUSIONS

Amec Foster Wheeler reviewed 378 data records from field samples during this validation. All of the data generated are usable and of acceptable quality with the addition of qualifiers presented in Table 3. Qualifier definitions are summarized in Section 4.0, reason codes are summarized in Section 5.0, and qualified data are summarized below.

- Amec Foster Wheeler J qualified 20 records (5.3%) as being estimated concentrations because of hold time exceedance and filed duplicate imprecision.

No records were rejected and 100% of the data should be considered valid with the addition of the qualifiers presented in Table 3.

REFERENCES

AECOM, 2015. Sampling and Analysis Plan Coal Combustion Residual (CCR) Groundwater Monitoring Four Corners Power Plant Arizona Public Service, Farmington, New Mexico, December 2015.

EPA, 2014. EPA Contract Laboratory Program (CLP) National Functional Guidelines for Inorganic Superfund Data Review, EPA-540 R 013 001.

LIMITATIONS

This report was prepared exclusively for Arizona Public Service by Amec Foster Wheeler Environment & Infrastructure, Inc. The quality of information, conclusions, and estimates contained herein is consistent with the level of effort involved in Amec Foster Wheeler services and based on: i) information available at the time of preparation, ii) data supplied by outside sources, and iii) the assumptions, conditions, and qualifications set forth in this report. This data validation report is intended to be used by Arizona Public Service, Four Corners Power Plant site only, subject to the terms and conditions of its contract with Amec Foster Wheeler. Any other use of, or reliance on, this report by any third party is at that party's sole risk.

TABLES

TABLE 1
Field Samples Submitted to Test America Laboratories Inc
Four Corners Power Plant, Arizona Public Service
Farmington, New Mexico

Field Sample ID	Collection Date	Test America Sample ID	Notes
FC-CCR-MW7-816	8/21/2016	550-68449, 68450, and 68451-1	
FC-CCR-MW8-816	8/21/2016	550-68449, 68450, and 68451-2	
FC-CCR-MW49A-816	8/21/2016	550-68449, 68450, and 68451-3	
FC-CCR-MW60-816	8/21/2016	550-68449, 68450, and 68451-4	
FC-CCR-MW61-816	8/21/2016	550-68449, 68450, and 68451-5	
FC-CCR-MW62-816	8/20/2016	550-68449, 68450, and 68451-6	
FC-CCR-MW63-816	8/20/2016	550-68449, 68450, and 68451-7	
FC-CCR-MW64-816	8/20/2016	550-68449, 68450, and 68451-8	
FC-CCR-MW65-816	8/20/2016	550-68449, 68450, and 68451-9	
FC-CCR-MW66-816	8/20/2016	550-68449, 68450, and 68451-10	
FC-CCR-MW67-816	8/20/2016	550-68449, 68450, and 68451-11	
FC-CCR-MW68-816	8/20/2016	550-68449, 68450, and 68451-12	
FC-CCR-MW69-816	8/21/2016	550-68449, 68450, and 68451-13	
FC-CCR-MW70-816	8/20/2016	550-68449, 68450, and 68451-14	
FC-CCR-MW71-816	8/21/2016	550-68449, 68450, and 68451-15	
FC-CCR-MW72-816	8/21/2016	550-68449, 68450, and 68451-16	
FC-CCR-MW100-816	8/20/2016	550-68449, 68450, and 68451-17	Field duplicate of FC-CCR-MW67-616
FC-CCR-MW101-816	8/21/2016	550-68449, 68450, and 68451-18	Field duplicate of FC-CCR-MW71-616

Notes:
ID = identification

TABLE 2
Field Duplicate Detections
Four Corners Power Plant, Arizona Public Service
Farmington, New Mexico

Analyte	RL	Primary Concentration	Field Duplicate Concentration	RPD	Notes
Samples FC-CCR-MW67-816 and FC-CCR-MW100-816					
Fluoride[1]	8.0 mg/L	23	24	4.3%	
Fluoride[2]	4.0 mg/L	19	20	5.1%	
Chloride	400 mg/L	1,400	1,500	6.9%	
Sulfate	400 mg/L	7,500	7,900	5.2%	
Lithium	0.20 mg/L	0.36	0.35	2.8%	
Calcium	2.0 mg/L	510	510	0.0%	
Boron	0.50 mg/L	100	110	9.5%	
Antimony	0.00010 mg/L	0.00021	0.00029	32%	± RL
Arsenic	0.00050 mg/L	0.0039	0.0040	2.5%	
Barium	0.00050 mg/L	0.020	0.022	9.5%	
Cadmium	0.00010 mg/L	0.00011	0.00020 U	NC	± RL
Chromium	0.00050 mg/L	0.0010	0.0016	46%	J-FD
Cobalt	0.00050 mg/L	0.0055	0.0064	15%	
Molybdenum	0.00050 mg/L	0.0064	0.0063	1.6%	
Selenium	0.00050 mg/L	0.067	0.068	1.5%	
Thallium	0.00010 mg/L	0.00031	0.00034	9.2%	
Total Dissolved Solids	100 mg/L	15,000	16,000	6.5%	
pH	1.7 pH units	7.1	7.1	0.0%	
Radium 226	0.3 pCi/L	0.7	0.9	25%	± RL
Radium 228	0.7 pCi/L	1.6	2.1	27%	± RL
Total Radium	0.7 pCi/L	2.3	3.0	26%	± RL
Samples FC-CCR-MW71-816 and FC-CCR-MW101-816					
Chloride	40 mg/L	590	580	1.7%	
Sulfate	1,000 mg/L	8,400	8,600	2.4%	
Lithium	0.20 mg/L	0.36	0.37	2.7%	
Calcium	2.0 mg/L	450	450	0.0%	
Boron	0.050 mg/L	0.56	0.55	1.8%	
Antimony	0.00020 mg/L	0.00024	0.00022	8.7%	
Arsenic	0.0010 mg/L	0.0066	0.0076	14.1%	
Barium	0.0010 mg/L	0.014	0.013	7.4%	
Molybdenum	0.0010 mg/L	0.0025	0.0024	4.1%	
Selenium	0.0010 mg/L	0.26	0.25	3.9%	
Thallium	0.0010 mg/L	0.00029	0.00028	3.5%	
Total Dissolved Solids	100 mg/L	14,000	14,000	0.0%	
pH	1.7 pH units	7.1	7.1	0.0%	
Radium 226	0.3 pCi/L	0.6	0.3	67%	± RL
Radium 228	0.7 pCi/L	1.0	0.8	22%	± RL
Total Radium	0.7 pCi/L	1.6	1.1	37%	± RL

TABLE 2
Field Duplicate Detections
Four Corners Power Plant, Arizona Public Service
Farmington, New Mexico

Notes:

mg/L = milligrams per liter

pCi/L = picoCuries per liter

RPD = relative percent difference

[1] Sample analysis associated with TestAmerica sample ID 550-68449-11 (source) and 550-68449-17 (field duplicate)

[2] Sample analysis associated with TestAmerica sample ID 550-68450-11 (source) and 550-68450-17 (field duplicate)

Qualifier and Reason Code Definitions:

FD = Field duplicate imprecision

± RL = The difference between analyte concentrations is less than, or equal to, the reporting limit, demonstrating acceptable sampling and/or analytical precision.

J = The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.

U = The analyte was analyzed for, but was not detected above the reported sample quantitation limit

TABLE 3
Qualifiers Added During Data Validation
Four Corners Power Plant, Arizona Public Service
Farmington, New Mexico

Sample IDs	Methods	Analytes	Concentrations	Qualifiers and Reason Codes
FC-CCR-MW7-816	SM 4500B	pH	7.1 pH units	J HT
FC-CCR-MW8-816	SM 4500B	pH	6.9 pH units	J HT
FC-CCR-MW49A-816	SM 4500B	pH	7.2 pH units	J HT
FC-CCR-MW60-816	SM 4500B	pH	7.4 pH units	J HT
FC-CCR-MW61-816	SM 4500B	pH	8.5 pH units	J HT
FC-CCR-MW62-816	SM 4500B	pH	6.7 pH units	J HT
FC-CCR-MW63-816	SM 4500B	pH	6.9 pH units	J HT
FC-CCR-MW64-816	SM 4500B	pH	7.5 pH units	J HT
FC-CCR-MW65-816	SM 4500B	pH	7.4 pH units	J HT
FC-CCR-MW66-816	SM 4500B	pH	7.3 pH units	J HT
FC-CCR-MW67-816	200.8	Chromium	0.0010 mg/L	J FD
	SM 4500B	pH	7.1 pH units	J HT
FC-CCR-MW68-816	SM 4500B	pH	7.0 pH units	J HT
FC-CCR-MW69-816	SM 4500B	pH	7.4 pH units	J HT
FC-CCR-MW70-816	SM 4500B	pH	7.0 pH units	J HT
FC-CCR-MW71-816	SM 4500B	pH	7.1 pH units	J HT
FC-CCR-MW72-816	SM 4500B	pH	7.0 pH units	J HT
FC-CCR-MW100-816	200.8	Chromium	0.0016 mg/L	J FD
	SM 4500B	pH	7.1 pH units	J HT
FC-CCR-MW101-816	SM 4500B	pH	7.1 pH units	J HT

Qualifier Definitions:

J = The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.

Reason Codes:

FD = Field duplicate RPD exceeded established criteria

HT = Holding time exceeded