

**Michigan Department of Environment, Great Lakes, and Energy**  
Quarterly Other Cleanup Authority Report - Summary of Recent Activities and  
Response Actions  
Gelman Sciences Inc. Site  
May 10, 2019

This document provides a brief update of activities conducted from October 2018 thru March 2019. Links to other historical information about the Gelman site are also provided below.

### **2018 Residential Well Sampling**

**The residential and business water supply well sampling activities for 2018 were completed in August 2018. In 2018, out of 67 water supply wells sampled, none of the water supply wells exceeded the 7.2 parts per billion (ppb) criterion for 1,4-dioxane (Dioxane) in residential drinking water. Dioxane was detected in only two residential wells on the south side of Elizabeth Road at concentrations ranging from 1-2 ppb, well below the 7.2 ppb criterion. Both properties have had previous detections ranging from 1-4 ppb.**

In collaboration with the Washtenaw County Health Department (WCHD), the Department of Environment Great Lakes and Energy (EGLE) initiated sampling of residential and business water supply wells within and around the known Dioxane groundwater contamination plume in the 1990's as part of the monitoring activities to evaluate and abate risk of exposure to contamination above the applicable state drinking water criterion (note that there is no applicable federal criterion). Both EGLE and the WCHD annually review which water supply wells should be sampled. The wells are sampled by WCHD, usually once per year with specific wells sampled twice per year. The 2018 sampling activities included wells along Christine Drive (last sampled in 2014), Lakeview Drive (last sampled in 2016), and Rose Drive (last sampled in 2016). As stated above WCHD was able to collect samples at 67 locations.

Washtenaw County communicates results directly to well owners and building occupants. Results (identified by address) for water supply well samples collected since 1998 and including 2018 are posted on the EGLE "Gelman Sciences, Inc. Site of Contamination Information Page" under the "Recent Analytical Data" tab which can be accessed using the link provided below.

[Recent Analytical Data](#)

### **2019 Residential Well Sampling**

**For 2019, a total of 117 water supply wells are planned to be sampled as part of the ongoing residential and business water supply well sampling program. These include locations along Dexter Road (last sampled in 2017), W. Delhi Road (last sampled in 2014), and Breezewood Court (last sampled in 2014). The 2019**

sampling activities also include first time sampling of locations along W. Liberty Road, Saginaw Court, and Westview Way. During the 2019 sampling activities selected locations will also be sampled for Full Scan Volatile Organic Compounds (VOCs) and Semi-Volatile Organic Compounds (SVOC). The sampling activities were initiated during the week of April 15 and will be completed by October 2019.

### **Monitoring Well Sampling**

**Gelman currently conducts sampling and analysis of approximately 300 monitoring wells (MWs) throughout the site and vicinity.**

The MWs have been installed for the specific purpose of monitoring and evaluating the Dioxane contamination in groundwater. The water from these wells is not used for drinking, irrigation or any other purpose. Specific MWs are sampled on a monthly, quarterly, semi-annual, annual, and biennial basis following EGLE approved monitoring plans for specific areas of the site identified as the Western Area, Eastern Area and the Little Lake Area. EGLE collects samples of selected MWs with Gelman (i.e. “split sampling”), periodically, as a check of the quality and accuracy of data submitted by Gelman.

From October 2018 thru March 2019 Gelman collected samples at 431 MW locations as identified below:

- October 117 MWs Sampled
- November 77 MWs Sampled
- December 55 MWs Sampled
- January 84 MWs Sampled
- February 40 MWs Sampled
- March 58 MWs Sampled

Results of monitoring well samples collected by both Gelman and EGLE are posted on the EGLE “Gelman Sciences, Inc. Site of Contamination Information Page” under the “Recent Analytical Data” tab. Historic data and results since 2003 are also posted.

A 2015 map which depicts the locations of the monitoring wells can also be found on the EGLE Gelman webpage under the Maps heading (See link below).

### **[Monitor Well Location Map](#)**

### **Current Remediation Activities**

**Current remediation activities are performed by Gelman and involve the operation of groundwater extraction wells located at the former Gelman Plant site and elsewhere in Scio Township and the City of Ann Arbor. From October 2018 thru**

**March 2019 Gelman removed contaminated groundwater at an average rate of 474 gallons per minute from extraction wells.**

From October 2018 through March 2019 Gelman pumped and treated approximately 129,275,245 gallons of contaminated groundwater from extraction wells removing 420 pounds of Dioxane as listed below:

<u>Extraction Wells Operated</u>		<u>Groundwater Pumped</u>	<u>Dioxane Removed</u>
October	14	27,268,274 gallons	77 pounds
November	10	20,244,186 gallons	69 pounds
December	11	20,711,882 gallons	73 pounds
January	12	21,255,350 gallons	77 pounds
February	10	18,335,111 gallons	59 pounds
March	10	21,460,442 gallons	65 pounds

Contaminated groundwater collected from the extraction wells is piped to the Gelman plant and treated using ozone and hydrogen peroxide. The treated groundwater is then discharged to a tributary of Honey Creek under a National Pollutant Discharge Elimination System (NPDES) permit issued by EGLE. The current NPDES permit became effective on February 1, 2016 and will expire on October 1, 2019. The NPDES permit establishes discharge limits for Dioxane and treatment chemicals and byproducts. The current permit's discharge limits for Dioxane are 7 ppb (monthly average) and 22 ppb (daily maximum).

Also, during the October 2018 through March 2019 period Gelman completed routine maintenance on selected extraction wells, completed proper abandonment of extraction well TW-8 and installed TW-28, the replacement extraction for TW-8. Also, during this period maintenance was completed on the treatment system including plumbing upgrades in the Red Pumphouse.

Data and information about the remediation activities can be found in the monthly NPDES monitoring reports and quarterly progress reports submitted by Gelman. Mass reduction (Pounds of 1,4-Dioxane removed) in each of the aquifer systems are identified in the Gelman quarterly progress reports. Historic and current information on pumping rates of extraction wells can be found in the "Average Monthly Extraction Flow Rates" table updated and submitted quarterly by Gelman. The reports and table are posted to the EGLE Gelman web page under the "Selected Documents" tab (See link below).

[Selected Documents](#)

A 2015 map which depicts the locations of the extraction wells (purge wells) can also be found on the EGLE Gelman webpage under the Maps heading (See Monitor Well Location Map link on Page 2).

## **Surface Water and Seep Sampling**

**On September 18 and 19, 2018 EGLE continued the sampling of surface waters, including ponds, creeks, and drains in and around the site and vicinity for 1,4 dioxane. In addition, samples were collected of water in the Allen Creek Drain system, including the Hanna Nature Area Creek, for additional volatile organic compound (VOC) analysis. The results of the 2018 sampling activities are summarized below. Other 2019 surface water sampling activities are described in the “Recent Investigation” section below:**

Surface water samples have been analyzed from:

- Allen Creek (Drain) Tributary in the southwest corner of West Park – 19 ppb. Additional VOCs were not detected
- Allen Creek (Drain) Tributary near Glendale Circle – Not Detected. Additional VOCs were not detected.
- Little Lake – 4.1 ppb
- First Sister Lake – Not Detected
- Second Sister Lake – Not Detected
- Third Sister Lake – 2.9 ppb
- Smith Pond \_West – Not Detected
- Smith Pond \_East – Not Detected
- Unnamed Tributary of Honey Creek at Jackson Rd – 3.9 ppb
- Unnamed Tributary of Honey Creek at Park Rd – 3.8 ppb
- Unnamed Tributary of Honey Creek at the Gelman Discharge outfall – 4.9 ppb
- Unnamed Tributary of Honey Creek at the Gelman Discharge outfall (immediately upstream) – 5.2 ppb
- Unnamed Tributary of Honey Creek at the Gelman Discharge outfall (upstream towards Marshy Area) – Not Detected
- Honey Creek/Huron River (HC/HR) confluence – Not Detected
- Honey Creek at Dexter Rd – 2.1 ppb
- Arbor Landing Pond – Not Detected
- West Park Pond – Not Detected
- Hanna Nature Area Creek – Not detected. Additional VOCs were not detected.

Results of surface water samples collected by both Gelman and EGLE are posted on the EGLE Gelman web page under the “Recent Analytical Data” tab (See link below).

EGLE is planning to collect surface water samples at the above referenced locations again in 2019.

## [Recent Analytical](#)

### Recent Investigation(s)

At the request of the Washtenaw County Water Resources Commission, EGLE initiated a six-month sampling investigation of the Allen Creek Drain at 7 specific manhole locations. The locations are summarized below:

**Location #1 – Manhole in Westpark (that has been previously sampled as Allen Creek -West Park SW)**

**Location #2 – Manhole on Chapin Street.**

**Location #3 – Manhole on Maple Ridge**

**Location #4 – Manhole on Wildwood Ave**

**Location #5 – Manhole on Murray Ave**

**Location #6 – Manhole on Eighth St**

**Location #7 – Manhole in the ravine in Maryfield/Wildwood Park**

During the planning of the investigation EGLE requested that Gelman conduct the investigation using the work plan developed by EGLE. Gelman voluntarily agreed and is conducting the sampling and analysis of the samples for 1,4-dioxane. EGLE is overseeing the sampling activities and collecting samples for Full Scan VOC analysis at the EGLE Environmental Laboratory (EGLE Laboratory) at each of the 7 locations. EGLE is also collecting samples, for 1,4-dioxane analysis at the EGLE Laboratory, from selected locations during each sampling event. To date sampling events have been conducted on February 7, March 12, and April 18, 2019. A summary of the 1,4-dioxane results from these sampling events is provide in the table below.

<u>Location</u>	<u>Concentration Range</u>
West Park SW	15 – 19 ppb
Chapin Street	8.7 – 9.8 ppb
Maple Ridge	ND
Wildwood	ND
Murray	0.98 – 1.3 ppb
Eighth	ND
Maryfield/Wildwood Park	ND

**Full analytical results for the specific sampling events will be posted on the EGLE Gelman web page under the “Recent Analytical Data” tab which can be accessed using the link provided below.**

[Recent Analytical](#)

### **Other Recent Activities**

**EGLE attended, provided information, and answered questions at 9 local meetings concerning the Gelman Site from October 2018 through February 2019.**

These meetings included:

- Coalition for Action on Remediation of Dioxane (CARD) Monthly Meeting, Washtenaw County Western Service Center, October 2, 2018.
- Coalition for Action on Remediation of Dioxane (CARD) Quarterly Technical Meeting, Washtenaw County Western Service Center, November 13, 2018.
- EPA/Muni-Agency Stakeholder Meeting, Scio Township Offices, October 29, 2018.
- Allen Creek Drain Sample Planning Meeting with the Washtenaw County Water Resources Commissioner, Washtenaw County Western Service Center, November 19, 2018.
- Coalition for Action on Remediation of Dioxane (CARD) Monthly Meeting, Washtenaw County Western Service Center, December 4, 2018.
- Allen Creek Drain Sample Planning Meeting with the Washtenaw County Water Resources Commissioner, Washtenaw County Western Service Center, December 14, 2018.
- Coalition for Action on Remediation of Dioxane (CARD) Monthly Meeting, Washtenaw County Western Service Center, January 2019, 2018.
- Coalition for Action on Remediation of Dioxane (CARD) Quarterly Technical Meeting, Washtenaw County Western Service Center, February 5, 2019.
- Coalition for Action on Remediation of Dioxane (CARD) Monthly Meeting, Washtenaw County Western Service Center, March 5, 2019.

### **Recent Court Actions**

The court ordered confidential negotiations to modify the current Consent Judgement are on-going. The negotiating parties include Gelman, EGLE, the City of Ann Arbor, Washtenaw County, Scio Township, and the Huron River Watershed Council.

## **Stakeholders Issues**

The EPA has identified stakeholder issues of concern to the EGLE Project Manager and has requested EGLE list and track the issues in quarterly reports. Previous and new issues and requests for information are listed below. EGLE has provided initial answers and discussions where possible and will continue to provide information about the issues in future reports as new data and information is made available and evaluated.

### **Previous Issues**

- 1) EPA is evaluating the potential for Per- and Polyfluoroalkyl Substances (PFAS) contamination at sites around the country.
- Evaluate whether PFAS contamination could be associated with releases from the Gelman Facility.

***In March 2018 EGLE requested that Gelman review its records to determine if PFAS was used in the manufacturing processes and provide copies of any such records which indicate use of PFAS. Concurrently EGLE has discussed developing a scope of work to conduct sampling of selected monitoring wells on the Gelman Site property as a next step to evaluate whether PFAS should be identified as a contaminant of concern at the Gelman Site. Data and information will be presented after completion of any sampling activities.***

***Update – In October 2018 Gelman informed EGLE that the file review was complete and that they did not identify significant use of PFAS containing substances at the Gelman Site. EGLE has requested that Gelman document the file review in a written summary.***

***In addition, EGLE continues its response to this emerging contaminant throughout the state including within the Huron River Watershed. EGLE began sampling intensively on the Huron River due to the City of Ann Arbor (City) detecting PFAS in the Huron River, which is the main source of the City's drinking water, and the discovery of perfluorooctanesulfonic acid (PFOS) in the river at concentrations greater than the Rule 57 water quality standard of 11 parts per trillion (ppt) of PFOS. Information on the work completed thus far within the Huron River Watershed with respect to PFAS can be found at the link below:***

**[Huron River Watershed PFAS Information](#)**

***Additionally, EGLE Water Resources Division has obtained effluent samples from various locations within the Huron River Watershed, including from the outfall of the existing Gelman treatment system, as***

***part of the ongoing investigation with respect to PFAS within the Huron River Watershed.***

***Update - Sampling at the Gelman outfall was completed on November 27, 2018. Results for the individual PFAS compounds included in the analysis were non-detect. Reporting limits for the individual PFAS compounds, as presented in the laboratory report, ranged from 0.87 to 5.2 parts per trillion (ppt). Results will be posted on the EGLE Gelman web page under the "Recent Analytical Data" tab.***

- 2) EPA points out that it is important to understand the risks posed by soil and sediment contaminated with Dioxane stemming from the Gelman facility. If there are elevated concentrations in those media, that could be an indication of an ongoing source to groundwater and/or surface water. Data from those areas are also essential for any evaluation of risk due to direct contact and/or ingestion exposure for human or ecological exposures. Discuss the following:
- Soil/sediment sampling results for borings collected at Gelman owned parcels through the present, on the original Gelman parcel (including split parcels) and on any nearby parcels that may have been impacted by Gelman's contamination.
  - Discuss the risks those levels of 1,4-dioxane pose to human receptors.

***Gelman has voluntarily conducted additional sampling of soils and groundwater on and adjacent to the site property. EGLE is expecting a report summarizing the investigation once Gelman has completed compiling and evaluating the site investigation information and data. This information will be used, as appropriate, to evaluate risk due to direct contact and/or ingestion exposure for human or ecological exposures.***

***Update – No new information about the on-property site investigation data and information.***

- 3) 1,4-dioxane contamination in the near surface groundwater can pose a risk through exposure pathways other than the consumption of drinking water. Discuss the following:
- The status of the sampling and characterization of the shallow groundwater and seeps within the prohibition zone.
    - Detail historical sampling activities targeting the near surface groundwater within the prohibition zone and in the Scio Township area.

***Gelman conducted a shallow groundwater investigation, within the prohibition zone and in Scio Township, using an EGLE developed work***

plan in October 2016. The report presenting the data and information can be viewed at [Shallow Groundwater Investigation](#). In summary, twenty-seven soil borings were installed in parts of the City of Ann Arbor and Scio Township using Geoprobe drilling and sampling techniques. Groundwater was encountered in 16 of the 27 soil borings and sampled using temporary monitoring wells. Groundwater was not encountered, within a depth of 20 feet below ground level, in the remaining 11 soil borings. Depth to shallow groundwater is important because, following the proposed risk-based assumptions for Dioxane for the volatilization to indoor air pathway, shallow contaminated groundwater has a lower acceptable risk-based screening number than deep contaminated groundwater. The study was designed to focus on this shallow groundwater to address concerns expressed by the community who were afraid that shallow groundwater may be contaminated and pose an unacceptable risk.

Dioxane was detected in shallow groundwater at two boring locations in the investigation area at concentrations ranging from 1.9-3.3 ppb. Both locations are within the Prohibition Zone of the Eastern Area of the Gelman Site in the City of Ann Arbor. The concentrations of Dioxane detected in the shallow groundwater were less than EGLE Tier 1 vapor intrusion screening level of 29 ppb identified in the emergency rule adopted shortly after the time of the investigation, and significantly less than the 1,900 ppb screening level for shallow groundwater identified in the proposed rules package in 2017. The concentrations detected were also below the EPA Regional Screening Level (RSL) of 4.6 ppb. This RSL considers a combined exposure through the ingestion, dermal contact, and inhalation pathways.

Based upon an evaluation of all the data and information collected during the shallow groundwater investigation, including groundwater elevations, concentrations in both deep and shallow groundwater in that area, and proposed and current regulatory criteria and screening levels, the concentrations of Dioxane detected in the shallow groundwater in the investigation area currently do not pose an unacceptable risk for the volatilization to indoor air pathway to residences and buildings. Additional comparisons of concentrations of Dioxane detected in shallow groundwater to EPA RSLs for specific pathway exposures, such as inhalation (Inhalation RSL-11 ppb) and skin contact (Dermal RSL-2,300 ppb), also indicate that Dioxane in shallow groundwater in the investigation areas currently does not pose an unacceptable risk.

**Update – No new information or discussion.**

- Provide the status of any upcoming sampling of shallow groundwater and/or seeps.

*As stated above current data and information indicates that Dioxane in shallow groundwater currently does not pose an unacceptable risk and that further investigations are not immediately warranted at this time. EGLE has stated that evaluation of data and information will be ongoing and that additional investigation activities will be identified and completed as needed to evaluate unacceptable risks.*

*EGLE will continue sampling surface waters, including ponds, creeks, and drains in and around the site and vicinity in 2019 to identify any potential contamination.*

- 4) Michigan has identified the potential risk that the groundwater plume poses to surface water bodies in the vicinity of the 1,4-dioxane plume.
  - a. Provide the status of the evaluation the risks posed by this groundwater to surface water (GSI) pathway.

*As discussed in an earlier progress report the Water Quality Values (WQV i.e. GSI criteria) for 1,4 dioxane were updated to 3.5 ppb for surface waters that are protected as a source of drinking water (Human Cancer Value [HCV] – drink) and 280 ppb for surface waters that are not protected as a drinking water sources (HCV non-drink). At this time these changes do not affect the groundwater remedy that is being implemented by Gelman under the current CJ overseen by EGLE and the Washtenaw Circuit Court. The current CJ does not require Gelman to directly address the GSI, in part because the previous GSI criteria were much higher and were not included in the court-ordered remedy. Because of the ongoing court ordered confidential CJ modification negotiations EGLE cannot speculate on how the changed GSI criteria may affect the Gelman remedy in the future.*

- b. List those surface water bodies, including Barton Pond that could potentially be impacted by the plume.

*Specific surface water bodies that have been sampled and will continue to be sampled are identified earlier in this report. Current data and information indicates that Barton Pond is not likely to be impacted from groundwater contamination migrating from the Gelman Site. In addition the current CJ requires groundwater sampling of the monitoring well system that is in place. The ongoing sampling of the monitoring well system would detect any changes to the groundwater contamination well before those changes could impact Barton Pond.*

**Update – No new information or discussion.**

5) Ecological Exposure

Provide the status of Ecological exposure evaluation. Discuss the following:

- Historic and current soil, sediment and surface water sampling results of the wetlands area near the Gelman facility, with focus on 1,4-dioxane results.
- Near surface water potential exposure and associated screening levels. Evaluation of ecological risks posed by contamination which stems from the Gelman facility. Include a discussion of potential ecological receptors.

*As stated above, Gelman has voluntarily conducted additional sampling of soils and groundwater on and adjacent to the site property. EGLE is expecting a report summarizing the investigation once Gelman has completed compiling and evaluating the site investigation information and data. This information will be used, as appropriate, to evaluate ecological exposures.*

**Update – No new information about the on-property site investigation data and information.**

- 6) At least one stakeholder has asserted that Gelman was in violation of the current CJ with regard to concentrations of 1,4-dioxane found in MW-103s. Specifically, that concentrations detected in MW-103s, in excess of 85 ppb, trigger the requirement for Gelman to conduct additional investigation activities around MW-103s and submit a contingency plan on how Gelman proposes to address the possible migration of 1,4-dioxane outside the Prohibition Zone (PZ).

*The current CJ does not specifically identify trigger requirements for MW-103s. Compliance with the CJ is determined at the PZ boundary, not MW-103s. In response to discussions with Gelman and information provided by Gelman related to EGLE questions and concerns about the increasing concentrations of 1,4-dioxane observed in MW-103s EGLE issued compliance guidance letters in October 2013 and April 2014. Both compliance letters identify the detection of 1,4-dioxane at concentrations above 85 ppb in MW-103s for two consecutive months as the trigger requirement for submittal of a contingency plan. The contingency plan must outline how Gelman proposes to address possible migration of 1,4-dioxane outside the Prohibition Zone to ensure protection of public health and safety. As can be seen on the figure below, the concentrations of 1,4-dioxane observed in MW-103s have not been greater than 85 ppb for two consecutive months since the issuance of the compliance letters. EGLE will continue to review information from MW-103s and adjacent wells to evaluate compliance with the CJ.*

*Update – For two consecutive months (December 2018 and January 2019) 1,4-dioxane results at MW-103s exceeded 85 ppb. As identified in the October 2013 and April 2014 compliance guidance letters EGLE initiated discussions with Gelman about the preparation and submittal of a contingency plan to outline how Gelman proposes to address possible migration of 1,4-dioxane outside the Prohibition Zone. In those discussions, EGLE and Gelman concluded that the contingency plan requirement in the October 2013 and April 2014 letters had become outdated due to the new statewide generic drinking water cleanup criterion. EGLE and Gelman concluded that any issues relating to the MW-103s results should be resolved through the negotiations between EGLE, the Intervening Plaintiffs, and Gelman to amend the CJ to incorporate the new criterion. Gelman and the AG confirmed this understanding in letters dated January 28, 2019 and March 1, 2019, respectively. Copies of the letters will be posted on the EGLE Gelman web page under the “Selected Documents” tab.*

## 7) Monitoring Well Trends

Provide a statistical evaluation of the trends of monitoring wells at the Gelman Site.

*In response to EPA and stakeholder requests to evaluate analytical result trends at monitoring wells EGLE discussed the trend evaluation with Gelman and requested that they provide a trend analysis to EGLE for review. Gelman voluntarily agreed to conduct the trend analysis and to provide a summary report for EGLE review.*

*EGLE received the Gelman trend analysis report on April 22, 2019. Although EGLE is currently reviewing the report, to be transparent and attentive to stakeholders’ questions and concerns the report entitled “Summary of Mann-Kendall Statistical Analysis Results for Select Groundwater Monitoring Wells at the Gelman Sciences Inc. Site-April 2019” is presented in Appendix A of this document.*

## APPENDIX A

**SUMMARY OF MANN-KENDALL STATISTICAL ANALYSIS RESULTS FOR  
SELECT GROUNDWATER MONITORING WELLS AT THE  
GELMAN SCIENCES INC. SITE  
SCIO TOWNSHIP, MICHIGAN  
PREPARED BY FLEIS AND VANDENBRINK ENGINEERING INC.  
APRIL 19, 2019**

## **BACKGROUND**

The Mann-Kendall analysis is a statistical procedure that is used for analyzing trends in data over time (Gilbert, 1987). The Mann-Kendall analysis is a nonparametric method, which requires no assumptions regarding the underlying statistical distribution of the data. The test is also not sensitive to the sampling time interval over which the data are collected. For these reasons, the method is well suited for evaluation of concentration trends over time.

Mann-Kendall analyses were used for a select set of monitoring wells associated with the Gelman Sciences Inc. site to estimate 1,4-dioxane concentration trends in groundwater over time and evaluate current plume behavior. The analyses were conducted using the *GSI Mann-Kendall Toolkit for Constituent Trend Analysis, Version 1.0* developed by GSI Environmental Inc. ('Toolkit'). Mann-Kendall analysis results for each well are summarized on a table provided in Appendix 1. Toolkit outputs, which include the data used, Mann-Kendall test results and graphical representations of results, are provided in Appendix 2.

## **WELL SELECTION**

The Michigan Department of Environmental Quality (MDEQ) requested analysis of a select set of monitoring wells associated with the site. Gelman voluntarily added wells to the list. In total, 28 Eastern Area wells and 21 Western Area wells were selected for Mann-Kendall analysis. These selected wells are listed on the summary table provided as Appendix 1. In total, 49 monitoring wells associated with the Gelman Sciences Inc. site were analyzed using the Mann-Kendall statistical method.

## **METHODOLOGY**

According to Connor et al. (2014), the Mann-Kendall statistical methodology is not valid for more than 40 sampling events. Therefore, where sample sizes exceeded 40, data sets were chosen to include a select 40 or fewer sampling events using the following intervals:

- **Last 40:** Includes the full data set or the 40 most recent data points.
- **Pre-2011:** A subset of the 40 most recent data points and includes data from samples collected before May 1, 2011.
- **Post-2011:** A subset of the 40 most recent data points and includes data from samples collected on or after May 1, 2011.
- **Last 8:** Includes the 8 most recent data points.

Certain data sets were also limited since at least four sampling events are needed to calculate the confidence factor and concentration trend. Therefore, data sets with fewer than 4 events were omitted from analysis.

The Mann-Kendall analyses were completed by entering the appropriate time series 1,4-dioxane concentration data sets for each of the selected monitoring wells into the Toolkit. Where analytical results were nondetect (concentrations below the detection limit), an input of 0.5 times the reporting limit was used. The Toolkit automatically generated Mann-Kendall statistical metrics, including:

- **The ‘S’ Statistic:** Indicates whether concentration trend vs. time is generally decreasing (negative S value) or increasing (positive S value).
- **The Confidence Factor (CF):** The CF value modifies the S Statistic calculation to indicate the degree of confidence in the trend result, as in ‘Decreasing’ vs. ‘Probably Decreasing’ or ‘Increasing’ vs. ‘Probably Increasing.’ Additionally, if the confidence factor is quite low, due either to considerable variability in concentrations vs. time or little change in concentrations vs. time, the CF is used to apply a preliminary ‘No Trend’ classification, pending consideration of the COV.
- **The Coefficient of Variation (COV):** The COV is used to distinguish between a ‘No Trend’ result (significant scatter in concentration trend vs. time) and a ‘Stable’ result (limited variability in concentration vs. time) for datasets with no significant increasing or decreasing trend (e.g. low CF).

Concentration trends for 1,4-dioxane in groundwater were then estimated by the Toolkit according to the following criteria from Aziz et al. (2003):

<b>S Statistic</b>	<b>Confidence In Trend</b>	<b>Trend</b>
$S > 0$	$CF > 95\%$	<i>Increasing</i>
$S > 0$	$95\% \geq CF \geq 90\%$	<i>Probably Increasing</i>
$S > 0$	$CF < 90\%$	<i>No Trend</i>
$S \leq 0$	$CF < 90\%$ and $COV \geq 1$	<i>No Trend</i>
$S \leq 0$	$CF < 90\%$ and $COV < 1$	<i>Stable</i>
$S < 0$	$95\% \geq CF \geq 90\%$	<i>Probably Decreasing</i>
$S < 0$	$CF > 95\%$	<i>Decreasing</i>

Source: Aziz et al. (2003).

Note: The user can identify two other categories of data: ND = Dataset where all values are non-detect, and N/A = locations with < 4 sample results.

## SUMMARY OF RESULTS

Mann-Kendall test results across the study area were evaluated utilizing the “Post-2011” dataset, where available, to establish a consistent timeframe for comparison purposes. Other datasets, such as “Last 40” and “Last 8”, and visual assessments of the data trends were also considered to aid in interpretation of the results for the post-2011 data. A brief description of results and general interpretations follow.

### Eastern Area

Results of the Mann-Kendall analysis generally showed decreasing groundwater concentrations of 1,4-dioxane in internal eastern plume wells, extending as far east as MW-103d. As anticipated, Eastern Area wells on the plume periphery exhibited primarily increasing trends as the plume has migrated east within the Prohibition Zone. Just beyond this furthest extent of the shrinking plume core, 1,4-dioxane levels have increased marginally from 9.0 to 9.7 µg/L at MW-112i since 2011. Further north, concentrations have been slowly and steadily increasing to the most recent detected concentrations of 3.3 µg/L at MW-98s and 17 µg/L at MW-98d as the plume has migrated east in this area.

According to post-2011 data, the wells furthest to the north (MW-121d, MW-129d and MW-130i) showed an increasing trend but exhibit low and sporadic detections.

### Western Area/Little Lake

Regarding the western portion of the plume downgradient of Little Lake, 1,4-dioxane in groundwater collected from wells in this area exhibited decreasing concentration trends based on post-2011 data, except for MW-61d and MW-93, wells located within the core of the generally degrading Western plume. At MW-61d, 1,4-dioxane concentrations were non-detect (<1 ug/L) from January 2002 to July 2012. More recent trends show a gradual increase at this well after 2012 to a maximum detection of 7 µg/L in the most recent sample collected in November 2018. At MW-93, concentrations increased to a maximum of 11 µg/L in November 2016, and concentrations appear to be steadily decreasing after this time. This is supported by Mann-Kendall analysis of the last eight data points for MW-93, showing a decrease from 8.8 µg/L in April 2017 to 2 µg/L in March 2019.

North of the Gelman site, monitor well MW-133d has exhibited an increasing 1,4-dioxane concentration trend since 2011. However, concentrations have been low (less than 4.2 µg/L) during this period, and Mann-Kendall analysis of the last eight data points suggests a current decreasing trend since April 2017. The other two wells in this cluster (MW-133s and MW-133i) show no trend in post-2011 data.

Two monitor wells located within the former Gelman Sciences property boundary, MW-65i and MW-1 Replacement, are exhibiting increasing trends based on Mann-Kendall analyses of post-2011 data, but the trend analysis results are not consistent with longer term observations. Concentrations are expectedly elevated closer to the former source area near MW-1 Replacement, and a review of data for this well shows an apparent stable trend since 2014. During the last nine sampling events, concentrations at MW-1 Replacement have been steadily decreasing from 4,100 µg/L in February 2017 to 1,800 µg/L in February 2019. At MW-65i, although Mann-Kendall results suggest an increasing trend in post-2011 data, visual assessment and Mann-Kendall analysis of the last 40 data points indicate a clear and substantial decreasing trend: from a maximum concentration of 286 µg/L in January 2002 to 2.6 µg/L most recently in November 2018. Concentrations of 1,4-dioxane at MW-65i have been less than 3 µg/L since August 2008.

## ATTACHMENTS

Attachment 1 – Mann-Kendall Statistical Analysis Results Summary Table

Attachment 2 – Mann-Kendall Results and Graphs

## REFERENCES

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Sampling Point ID <sup>1</sup>	Area <sup>1</sup>	Data Set <sup>2</sup>	Sampling Dates		Number of Data Points Used	Total Number of Data Points	First Recorded Sampling Date	Sampling Frequency	COV	MK (S) Statistic	Confidence Factor	1,4-Dioxane Concentration Trend
			From	To								
373 Pinewood Shallow	E	Last 40	05/16/06	10/16/18	40	96	07/24/90	Quarterly	0.66	-680	>99.9%	Decreasing
373 Pinewood Shallow	E	Pre-2011	05/16/06	11/04/10	10	96	07/24/90	Quarterly	0.35	-39	>99.9%	Decreasing
373 Pinewood Shallow	E	Post-2011	05/11/11	10/16/18	30	96	07/24/90	Quarterly	0.29	-345	>99.9%	Decreasing
373 Pinewood Shallow	E	Last 8	01/26/17	10/16/18	8	96	07/24/90	Quarterly	0.08	2	54.8%	No Trend
465 Dupont	E	Last 40	10/28/08	10/25/18	40	105	02/02/98	Quarterly	0.14	-159	96.7%	Decreasing
465 Dupont	E	Pre-2011	10/28/08	11/03/10	9	105	02/02/98	Quarterly	0.11	1	50.0%	No Trend
465 Dupont	E	Post-2011	05/18/11	10/25/18	31	105	02/02/98	Quarterly	0.15	-178	99.9%	Decreasing
465 Dupont	E	Last 8	03/17/17	10/25/18	8	105	02/02/98	Quarterly	0.09	-9	83.2%	Stable
MW-1 Replacement	W	Last 40	10/10/12	02/20/19	29	29	10/10/12	Quarterly	0.31	109	97.9%	Increasing
MW-1 Replacement	W	Last 8	02/17/17	02/20/19	8	29	10/10/12	Quarterly	0.22	-15	95.8%	Decreasing
MW-22	W	Last 40	10/12/06	10/11/18	40	106	07/23/87	Quarterly	1.33	-522	>99.9%	Decreasing
MW-22	W	Pre-2011	10/12/06	10/20/10	9	106	07/23/87	Quarterly	0.70	-20	97.8%	Decreasing
MW-22	W	Post-2011	05/17/11	10/11/18	31	106	07/23/87	Quarterly	0.76	-245	>99.9%	Decreasing
MW-22	W	Last 8	02/17/17	10/11/18	8	106	07/23/87	Quarterly	0.31	26	100.0%	Increasing
MW-31	W	Last 40	02/01/99	08/21/18	40	57	05/16/89	Annual	0.30	-405	>99.9%	Decreasing
MW-31	W	Pre-2011	02/01/99	07/27/10	32	57	05/16/89	Annual	0.16	-126	97.9%	Decreasing
MW-31	W	Post-2011	08/05/11	08/21/18	8	57	05/16/89	Annual	0.30	-25	100.0%	Decreasing
MW-45s	W	Last 40	10/03/03	11/27/18	40	75	04/30/99	Semi-Annual	1.52	-506	>99.9%	Decreasing
MW-45s	W	Pre-2011	10/03/03	04/22/11	25	75	04/30/99	Semi-Annual	1.16	-241	>99.9%	Decreasing
MW-45s	W	Post-2011	10/24/11	11/27/18	15	75	04/30/99	Semi-Annual	0.44	13	72.1%	No Trend
MW-45s	W	Last 8	05/26/15	11/27/18	8	75	04/30/99	Semi-Annual	0.42	-13	92.9%	Probably Decreasing
MW-53i	W	Last 40	11/05/15	01/14/19	40	224	05/30/00	Monthly	0.37	-155	96.4%	Decreasing
MW-53i	W	Last 8	05/06/18	01/14/19	8	224	05/30/00	Monthly	0.35	-13	92.9%	Probably Decreasing
MW-56s	W	Last 40	10/09/06	12/27/18	40	79	09/07/00	Quarterly	0.41	-419	>99.9%	Decreasing
MW-56s	W	Pre-2011	10/09/06	01/05/11	18	79	09/07/00	Quarterly	0.36	-134	>99.9%	Decreasing
MW-56s	W	Post-2011	05/11/11	12/27/18	22	79	09/07/00	Quarterly	0.19	11	61.0%	No Trend
MW-56s	W	Last 8	02/15/17	12/27/18	8	79	09/07/00	Quarterly	0.22	-9	83.2%	Stable
MW-57	W	Last 40	11/08/05	02/20/19	40	60	09/07/00	Quarterly	0.62	207	99.2%	Increasing
MW-57	W	Pre-2011	11/08/05	08/10/10	8	60	09/07/00	Quarterly	1.00	1	50.0%	No Trend
MW-57	W	Post-2011	09/27/11	02/20/19	32	60	09/07/00	Quarterly	0.49	25	65.0%	No Trend
MW-57	W	Last 8	04/20/17	02/20/19	8	60	09/07/00	Quarterly	0.16	1	50.0%	No Trend
MW-61s	W	Last 40	07/25/03	11/08/18	40	64	09/12/00	Semi-Annual	0.48	-659	>99.9%	Decreasing
MW-61s	W	Pre-2011	07/25/03	07/27/10	20	64	09/12/00	Semi-Annual	0.18	-143	>99.9%	Decreasing
MW-61s	W	Post-2011	08/08/11	11/08/18	20	64	09/12/00	Semi-Annual	0.34	-121	>99.9%	Decreasing
MW-61s	W	Last 8	02/04/16	11/08/18	8	64	09/12/00	Semi-Annual	0.34	-12	91.1%	Probably Decreasing
MW-61d	W	Last 40	04/11/03	11/08/18	40	60	09/12/00	Semi-Annual	1.03	487	>99.9%	Increasing
MW-61d	W	Pre-2011	04/11/03	07/27/10	20	60	09/12/00	Semi-Annual	0.00	0	48.7%	Stable
MW-61d	W	Post-2011	08/08/11	11/08/18	20	60	09/12/00	Semi-Annual	0.62	127	>99.9%	Increasing
MW-61d	W	Last 8	02/04/16	11/08/18	8	60	09/12/00	Semi-Annual	0.43	25	100.0%	Increasing
MW-65i	W	Last 40	07/16/01	11/30/18	39	39	07/16/01	Semi-Annual	1.27	-428	>99.9%	Decreasing
MW-65i	W	Pre-2011	07/16/01	07/30/10	23	39	07/16/01	Semi-Annual	0.75	-151	>99.9%	Decreasing
MW-65i	W	Post-2011	09/24/11	11/30/18	16	39	07/16/01	Semi-Annual	0.44	55	99.3%	Increasing
MW-65i	W	Last 8	05/19/15	11/30/18	8	39	07/16/01	Semi-Annual	0.24	9	83.2%	No Trend
MW-71	E	Last 40	10/25/05	11/30/18	40	57	10/17/01	Semi-Annual	0.39	382	>99.9%	Increasing
MW-71	E	Pre-2011	10/25/05	04/14/11	23	57	10/17/01	Semi-Annual	0.28	213	>99.9%	Increasing
MW-71	E	Post-2011	09/21/11	11/30/18	17	57	10/17/01	Semi-Annual	0.42	-8	61.2%	Stable
MW-71	E	Last 8	12/08/15	11/30/18	8	57	10/17/01	Semi-Annual	0.66	-15	95.8%	Decreasing
MW-72s	E	Last 40	10/25/05	11/21/18	40	62	12/24/02	Semi-Annual	0.94	-759	>99.9%	Decreasing
MW-72s	E	Pre-2011	10/25/05	04/01/11	23	62	12/24/02	Semi-Annual	0.56	-252	>99.9%	Decreasing
MW-72s	E	Post-2011	08/01/11	11/21/18	17	62	12/24/02	Semi-Annual	0.71	-122	>99.9%	Decreasing
MW-72s	E	Last 8	05/21/15	11/21/18	8	62	12/24/02	Semi-Annual	0.41	-24	99.9%	Decreasing
MW-76s	E	Last 40	10/25/05	11/21/18	40	118	04/08/02	Monthly	0.94	-759	>99.9%	Decreasing
MW-76s	E	Pre-2011	10/25/05	04/01/11	23	118	04/08/02	Monthly	0.56	-252	>99.9%	Decreasing
MW-76s	E	Post-2011	08/01/11	11/21/18	17	118	04/08/02	Monthly	0.71	-122	>99.9%	Decreasing
MW-76s	E	Last 8	05/21/15	11/21/18	8	118	04/08/02	Monthly	0.41	-24	99.9%	Decreasing
MW-76i	E	Last 40	10/29/15	01/17/19	40	101	04/08/02	Monthly	0.12	-126	92.7%	Probably Decreasing
MW-76i	E	Last 8	06/07/18	01/17/19	8	101	04/08/02	Monthly	0.05	-4	64.0%	Stable
MW-76d	E	Last 40	04/08/02	07/06/15	35	35	04/04/02	Biannual	0.49	368	>99.9%	Increasing
MW-76d	E	Last 8	04/23/09	07/06/15	8	35	04/04/02	Biannual	0.22	9	83.2%	No Trend
MW-81	E	Last 40	11/03/09	02/08/19	40	90	08/06/02	Quarterly	0.31	-623	>99.9%	Decreasing
MW-81	E	Pre-2011	11/03/09	04/08/11	7	90	08/06/02	Quarterly	0.10	5	71.9%	No Trend
MW-81	E	Post-2011	09/23/11	02/08/19	33	90	08/06/02	Quarterly	0.30	-429	>99.9%	Decreasing
MW-81	E	Last 8	08/23/17	02/08/19	8	90	08/06/02	Quarterly	0.37	-8	80.1%	Stable
MW-82s	E	Last 40	01/16/04	09/21/18	40	45	11/07/02	Annual	1.42	726	>99.9%	Increasing
MW-82s	E	Pre-2011	01/16/04	04/14/11	31	45	11/07/02	Annual	2.10	438	>99.9%	Increasing
MW-82s	E	Post-2011	08/02/11	09/21/18	9	45	11/07/02	Annual	0.34	27	99.8%	Increasing
MW-82s	E	Last 8	10/19/11	09/21/18	8	45	11/07/02	Annual	0.32	21	99.6%	Increasing

Sampling Point ID <sup>1</sup>	Area <sup>1</sup>	Data Set <sup>2</sup>	Sampling Dates		Number of Data Points Used	Total Number of Data Points	First Recorded Sampling Date	Sampling Frequency	COV	MK (S) Statistic	Confidence Factor	1,4-Dioxane Concentration Trend
			From	To								
MW-82d	E	Last 40	11/07/02	09/12/16	24	24	11/07/02	Abandoned	0.72	71	95.9%	Increasing
MW-82d	E	Pre-2011	11/07/02	07/15/10	17	24	11/07/02	Abandoned	0.00	0	48.4%	Stable
MW-82d	E	Post-2011	08/02/11	09/12/16	8	24	11/07/02	Abandoned	0.62	3	61.4%	No Trend
MW-85	E	Last 40	02/16/11	10/23/18	40	116	03/14/03	Quarterly	0.42	-607	>99.9%	Decreasing
MW-85	E	Post-2011	05/12/11	10/23/18	37	116	03/14/03	Quarterly	0.43	-567	>99.9%	Decreasing
MW-85	E	Last 8	02/03/17	10/23/18	8	116	03/14/03	Quarterly	0.23	-9	83.2%	Stable
MW-91	E	Last 40	11/14/05	11/16/18	40	53	09/15/03	Semi-Annual	1.34	654	>99.9%	Increasing
MW-91	E	Pre-2011	11/14/05	04/26/11	25	53	09/15/03	Semi-Annual	1.37	229	>99.9%	Increasing
MW-91	E	Post-2011	11/16/11	11/16/18	15	53	09/15/03	Semi-Annual	0.36	50	99.3%	Increasing
MW-91	E	Last 8	05/12/15	11/16/18	8	53	09/15/03	Semi-Annual	0.10	-15	95.8%	Decreasing
MW-92	E	Last 40	01/08/09	11/09/18	40	66	08/30/04	Quarterly	0.31	531	>99.9%	Increasing
MW-92	E	Pre-2011	01/08/09	04/13/11	10	66	08/30/04	Quarterly	0.12	-7	70.0%	Stable
MW-92	E	Post-2011	08/02/11	11/09/18	30	66	08/30/04	Quarterly	0.30	342	>99.9%	Increasing
MW-92	E	Last 8	01/26/17	11/09/18	8	66	08/30/04	Quarterly	0.19	19	98.9%	Increasing
MW-93	W	Last 40	10/30/07	03/08/19	40	47	12/02/04	Quarterly	0.44	20	58.7%	No Trend
MW-93	W	Post-2011	09/17/11	03/08/19	36	47	12/02/04	Quarterly	0.45	107	92.5%	Probably Increasing
MW-93	W	Last 8	04/20/17	03/08/19	8	47	12/02/04	Quarterly	0.50	-22	99.8%	Decreasing
MW-98s	E	Last 40	04/03/06	09/10/18	22	22	04/03/06	Annual	0.93	41	86.9%	No Trend
MW-98s	E	Pre-2011	04/03/06	04/20/11	14	22	04/03/06	Annual	0.00	0	47.8%	Stable
MW-98s	E	Post-2011	11/17/11	09/10/18	8	22	04/03/06	Annual	1.02	13	92.9%	Probably Increasing
MW-98d	E	Last 40	04/03/06	11/12/18	37	37	04/03/06	Semi-Annual	0.40	534	>99.9%	Increasing
MW-98d	E	Pre-2011	04/03/06	04/20/11	21	37	04/03/06	Semi-Annual	0.34	172	>99.9%	Increasing
MW-98d	E	Post-2011	08/03/11	11/12/18	19	37	04/03/06	Semi-Annual	0.20	67	99.9%	Increasing
MW-98d	E	Last 8	05/12/15	11/12/18	8	37	04/03/06	Semi-Annual	0.06	6	72.6%	No Trend
MW-103s	E	Last 40	10/29/15	01/16/19	40	102	04/07/06	Monthly	0.13	34	64.9%	No Trend
MW-103s	E	Last 8	07/07/18	01/16/19	8	102	04/07/06	Monthly	0.14	24	99.9%	Increasing
MW-103d	E	Last 40	07/20/09	12/03/18	40	53	03/22/06	Quarterly	0.30	-591	>99.9%	Decreasing
MW-103d	E	Pre-2011	07/20/09	04/26/11	8	53	03/22/06	Quarterly	0.15	-5	68.3%	Stable
MW-103d	E	Post-2011	09/23/11	12/03/18	32	53	03/22/06	Quarterly	0.23	-350	>99.9%	Decreasing
MW-103d	E	Last 8	01/04/17	12/03/18	8	53	03/22/06	Quarterly	0.07	-11	88.7%	Stable
MW-104	E	Last 40	10/19/09	01/17/19	40	62	04/05/06	Quarterly	0.76	662	>99.9%	Increasing
MW-104	E	Pre-2011	10/19/09	04/20/11	6	62	04/05/06	Quarterly	0.00	0	39.3%	Stable
MW-104	E	Post-2011	08/03/11	01/17/19	34	62	04/05/06	Quarterly	0.61	464	>99.9%	Increasing
MW-104	E	Last 8	03/25/17	01/17/19	8	62	04/05/06	Quarterly	0.15	23	99.9%	Increasing
MW-107	E	Last 40	04/10/09	11/29/18	40	58	11/09/06	Quarterly	0.72	584	>99.9%	Increasing
MW-107	E	Pre-2011	04/10/09	04/13/11	9	58	11/09/06	Quarterly	0.31	28	99.9%	Increasing
MW-107	E	Post-2011	08/04/11	11/29/18	31	58	11/09/06	Quarterly	0.48	292	>99.9%	Increasing
MW-107	E	Last 8	02/16/17	11/29/18	8	58	11/09/06	Quarterly	0.08	-1	50.0%	Stable
MW-108s	E	Last 40	11/06/08	10/18/18	40	55	11/09/06	Quarterly	0.76	-729	>99.9%	Decreasing
MW-108s	E	Pre-2011	11/06/08	04/14/11	11	55	11/09/06	Quarterly	0.16	-35	99.7%	Decreasing
MW-108s	E	Post-2011	10/19/11	10/18/18	29	55	11/09/06	Quarterly	0.47	-375	>99.9%	Decreasing
MW-108s	E	Last 8	02/17/17	10/18/18	8	55	11/09/06	Quarterly	0.05	-16	96.9%	Decreasing
MW-108d	E	Last 40	01/28/09	10/18/18	40	56	11/09/06	Quarterly	0.36	-620	>99.9%	Decreasing
MW-108d	E	Pre-2011	01/28/09	04/14/11	10	56	11/09/06	Quarterly	0.13	-19	94.6%	Probably Decreasing
MW-108d	E	Post-2011	09/21/11	10/18/18	30	56	11/09/06	Quarterly	0.34	-331	>99.9%	Decreasing
MW-108d	E	Last 8	02/17/17	10/18/18	8	56	11/09/06	Quarterly	0.22	-10	86.2%	Stable
MW-110	E	Last 40	04/09/09	11/29/18	40	54	02/12/07	Quarterly	0.43	598	>99.9%	Increasing
MW-110	E	Pre-2011	04/09/09	04/20/11	9	54	02/12/07	Quarterly	0.08	-4	61.9%	Stable
MW-110	E	Post-2011	08/04/11	11/29/18	31	54	02/12/07	Quarterly	0.38	372	>99.9%	Increasing
MW-110	E	Last 8	02/01/17	11/29/18	8	54	02/12/07	Quarterly	0.10	22	99.8%	Increasing
MW-112i	E	Last 40	10/06/15	01/16/19	40	98	05/10/07	Monthly	0.11	240	99.8%	Increasing
MW-112i	E	Last 8	05/06/18	01/16/19	8	98	05/10/07	Monthly	0.06	7	76.4%	No Trend
MW-112d	E	Last 40	04/20/09	03/13/19	40	48	05/10/07	Quarterly	0.28	93	85.7%	No Trend
MW-112d	E	Pre-2011	04/20/09	04/28/11	9	48	05/10/07	Quarterly	0.00	0	46.0%	Stable
MW-112d	E	Post-2011	09/23/11	03/13/19	31	48	05/10/07	Quarterly	0.31	66	86.4%	No Trend
MW-112d	E	Last 8	05/17/17	03/13/19	8	48	05/10/07	Quarterly	0.42	-3	59.4%	Stable
MW-121d	E	Last 40	02/02/10	10/05/18	40	44	01/08/09	Quarterly	0.62	429	>99.9%	Increasing
MW-121d	E	Post-2011	09/23/11	10/05/18	34	44	01/08/09	Quarterly	0.59	321	>99.9%	Increasing
MW-121d	E	Last 8	02/24/17	10/05/18	8	44	01/08/09	Quarterly	0.17	18	98.4%	Increasing
MW-122s	E	Last 40	04/24/09	11/29/18	40	42	12/16/08	Quarterly	0.49	634	>99.9%	Increasing
MW-122s	E	Pre-2011	04/24/09	04/19/11	9	42	12/16/08	Quarterly	0.16	-17	95.1%	Decreasing
MW-122s	E	Post-2011	09/28/11	11/29/18	31	42	12/16/08	Quarterly	0.42	416	>99.9%	Increasing
MW-122s	E	Last 8	01/11/17	11/29/18	8	42	12/16/08	Quarterly	0.17	19	98.9%	Increasing
MW-125	W	Last 40	10/18/10	11/14/18	33	33	02/02/12	Quarterly	0.18	-168	99.6%	Decreasing
MW-125	W	Post-2011	05/13/11	11/14/18	31	33	02/02/12	Quarterly	0.19	-153	99.6%	Decreasing
MW-125	W	Last 8	02/14/17	11/14/18	8	33	02/02/12	Quarterly	0.26	-12	91.1%	Probably Decreasing

Sampling Point ID <sup>1</sup>	Area <sup>1</sup>	Data Set <sup>2</sup>	Sampling Dates		Number of Data Points Used	Total Number of Data Points	First Recorded Sampling Date	Sampling Frequency	COV	MK (S) Statistic	Confidence Factor	1,4-Dioxane Concentration Trend
			From	To								
MW-129d	E	Last 40	02/24/11	01/24/19	37	37	02/24/11	Quarterly	0.45	320	>99.9%	Increasing
MW-129d	E	Post-2011	09/21/11	01/24/19	35	37	02/24/11	Quarterly	0.45	290	>99.9%	Increasing
MW-129d	E	Last 8	01/25/17	01/24/09	8	37	02/24/11	Quarterly	0.37	2	54.8%	No Trend
MW-130i	E	Last 40	03/21/11	02/07/19	33	33	03/21/11	Quarterly	0.83	403	>99.9%	Increasing
MW-130i	E	Post-2011	09/25/11	02/07/19	31	33	03/21/11	Quarterly	0.80	367	>99.9%	Increasing
MW-130i	E	Last 8	04/21/17	02/07/19	8	33	03/21/11	Quarterly	0.10	19	98.9%	Increasing
MW-133s	W	Last 40	03/22/11	01/18/19	33	33	03/22/11	Quarterly	0.32	81	89.2%	No Trend
MW-133s	W	Post-2011	08/18/11	01/18/19	31	33	03/22/11	Quarterly	0.27	21	63.2%	No Trend
MW-133s	W	Last 8	04/13/17	01/18/19	8	33	03/22/11	Quarterly	0.20	1	50.0%	No Trend
MW-133i	W	Last 40	03/22/11	01/18/19	33	33	03/22/11	Quarterly	0.41	119	96.7%	Increasing
MW-133i	W	Post-2011	08/18/11	01/18/19	31	33	03/22/11	Quarterly	0.37	65	86.0%	No Trend
MW-133i	W	Last 8	04/13/17	01/18/19	8	33	03/22/11	Quarterly	0.29	4	64.0%	No Trend
MW-133d	W	Last 40	03/23/11	01/18/19	33	33	03/23/11	Quarterly	0.42	163	99.5%	Increasing
MW-133d	W	Post-2011	08/18/11	01/18/19	31	33	03/23/11	Quarterly	0.35	105	96.2%	Increasing
MW-133d	W	Last 8	04/13/17	01/18/19	8	33	03/23/11	Quarterly	0.60	-16	96.9%	Decreasing
MW-134s	W	Last 40	03/30/11	01/29/19	34	34	03/30/11	Quarterly	0.11	235	>99.9%	Increasing
MW-134s	W	Post-2011	05/12/11	01/29/19	32	34	03/30/11	Quarterly	0.10	173	99.8%	Increasing
MW-134s	W	Last 8	04/12/17	01/29/19	8	34	03/30/11	Quarterly	0.10	-5	68.3%	Stable
MW-134i	W	Last 40	03/30/11	01/29/19	34	34	03/30/11	Quarterly	0.23	208	99.9%	Increasing
MW-134i	W	Post-2011	05/12/11	01/29/19	32	34	03/30/11	Quarterly	0.21	148	99.2%	Increasing
MW-134i	W	Last 8	04/12/17	01/29/19	8	34	03/30/11	Quarterly	0.12	-3	59.4%	Stable
MW-134d	W	Last 40	03/30/11	01/29/19	34	34	03/30/11	Quarterly	0.16	260	>99.9%	Increasing
MW-134d	W	Post-2011	05/12/11	01/29/19	32	34	03/30/11	Quarterly	0.13	200	100.0%	Increasing
MW-134d	W	Last 8	04/12/17	01/29/19	8	34	03/30/11	Quarterly	0.12	14	94.6%	Probably Increasing
MW-138i	W	Last 40	12/08/14	10/29/18	11	11	12/08/14	Semi-Annual	0.12	34	99.6%	Increasing
MW-138i	W	Last 8	04/17/15	10/29/18	8	11	12/08/14	Semi-Annual	0.10	17	97.7%	Increasing
MW-141s	W	Last 40	01/16/15	12/18/18	9	9	01/16/15	Semi-Annual	0.20	-12	87.0%	Stable
MW-141s	W	Last 8	04/17/15	12/18/18	8	9	01/16/15	Semi-Annual	0.22	-11	88.7%	Stable
MW-141d	W	Last 40	01/16/15	11/08/18	10	10	01/16/15	Semi-Annual	0.13	6	66.8%	No Trend
MW-141d	W	Last 8	10/21/15	11/08/18	8	10	01/16/15	Semi-Annual	0.10	-10	86.2%	Stable

**Notes:**

Mann-Kendall (MK) Test results were obtained using the [GSI Mann-Kendall Toolkit for Constituent Trend Analysis](#), Version 1.0, GSI Environmental Inc., November 2012.

Where sample analytical results were nondetect, an input of 0.5 times the reporting limit was used.

COV = Coefficient of Variation.

<sup>1</sup>E = Eastern Area Well.

W = Western Area Well.

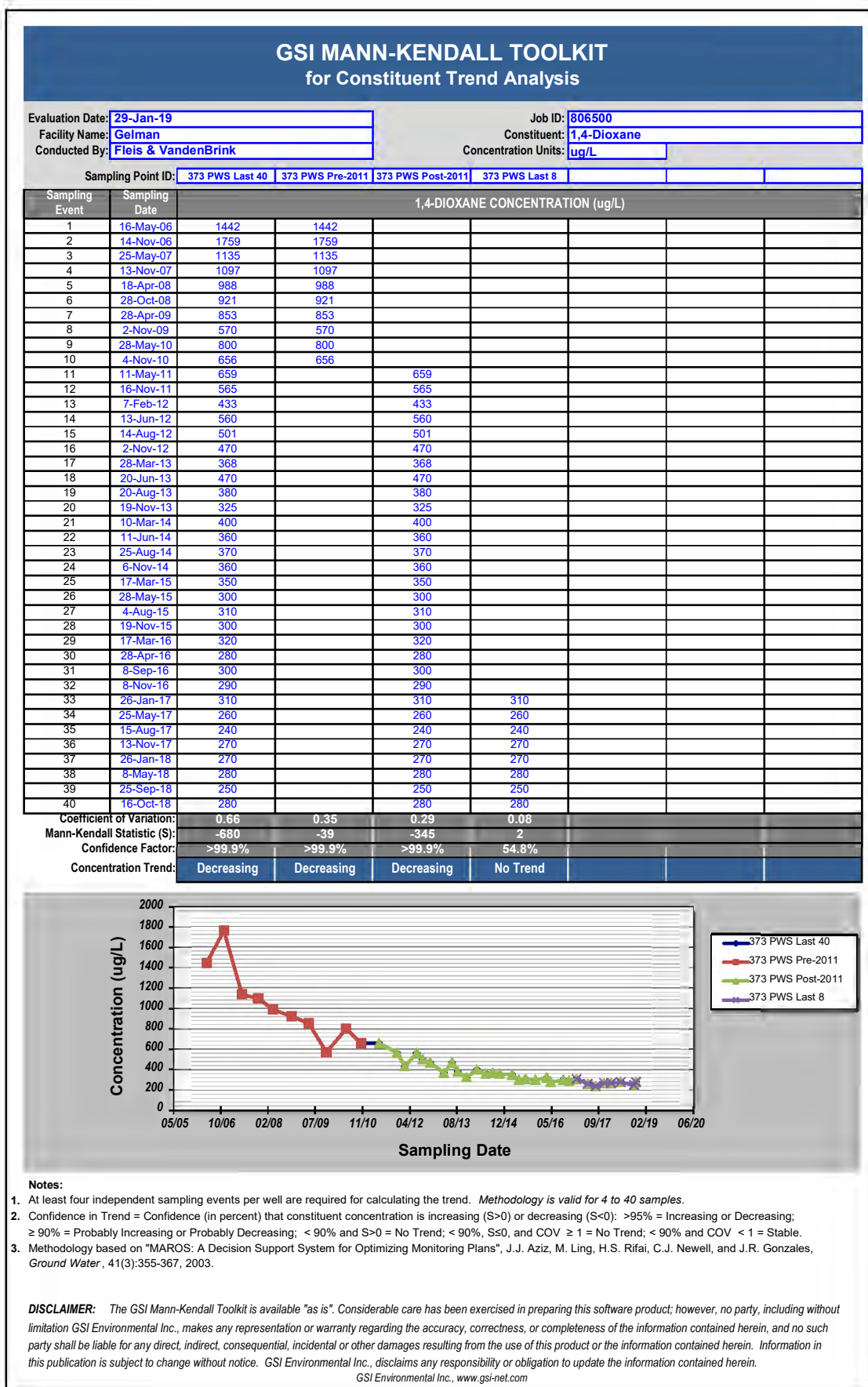
<sup>2</sup>The GSI Mann-Kendall Toolkit is limited to sample sizes between 4 and 40. Therefore, where sample sizes exceeded 40, data sets were chosen to include a select 40 or fewer data points using the following intervals:

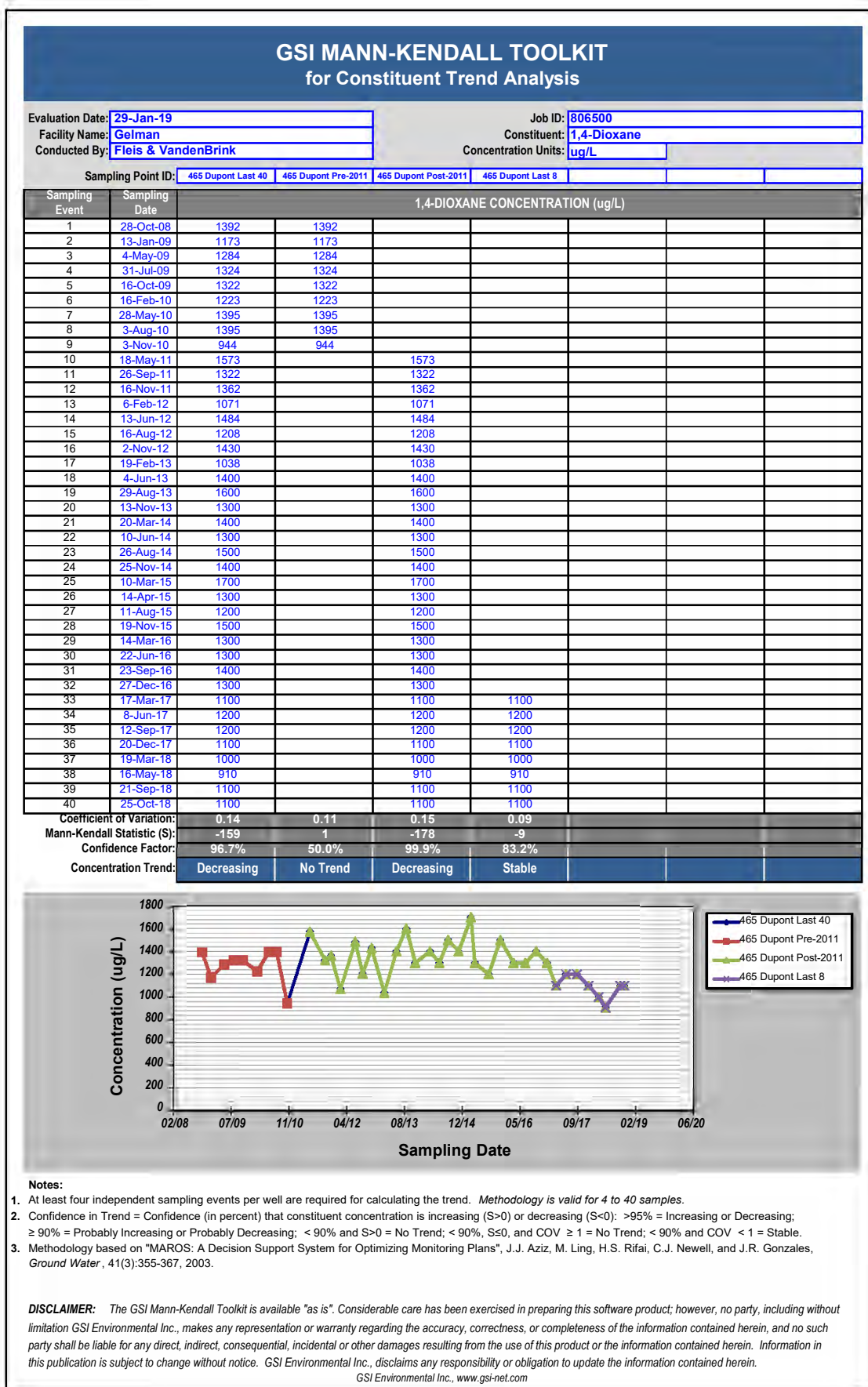
Last 40 - Includes the full data set or the 40 most recent data points.

Pre-2011 - A subset of the 40 most recent data points and includes data from samples collected before May 1, 2011.

Post-2011 - A subset of the 40 most recent data points and includes data from samples collected on or after May 1, 2011.

Last 8 - Includes the 8 most recent data points.





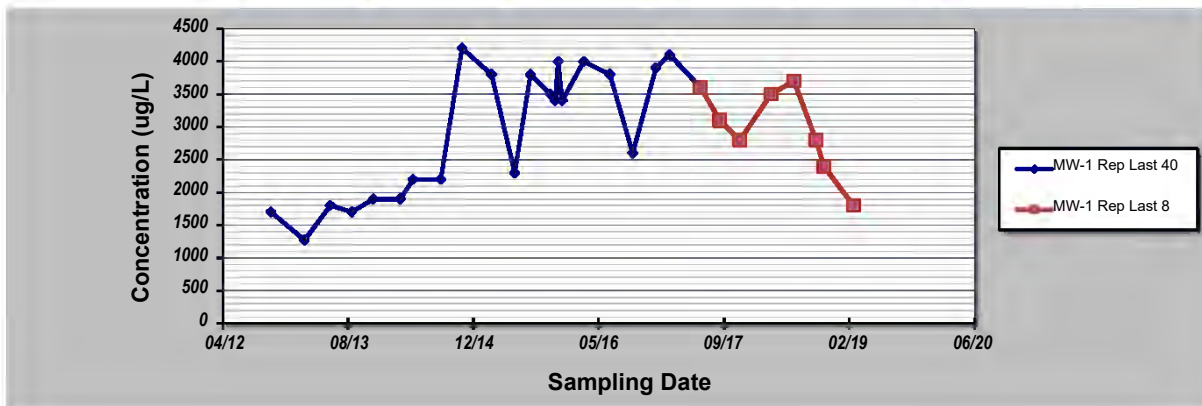
## GSI MANN-KENDALL TOOLKIT for Constituent Trend Analysis

Evaluation Date: **22-Mar-19**  
Facility Name: **Gelman**  
Conducted By: **Fleis & VandenBrink**

Job ID: **806500**  
Constituent: **1,4-Dioxane**  
Concentration Units: **ug/L**

Sampling Point ID: **MW-1 Rep Last 40** **MW-1 Rep Last 8**

Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)					
1	10-Oct-12	1700					
2	21-Feb-13	1272					
3	4-Jun-13	1800					
4	29-Aug-13	1700					
5	22-Nov-13	1900					
6	10-Mar-14	1900					
7	30-Apr-14	2200					
8	19-Aug-14	2200					
9	11-Nov-14	4200					
10	9-Mar-15	3800					
11	10-Jun-15	2300					
12	11-Aug-15	3800					
13	30-Oct-15	3500					
14	19-Nov-15	3400					
15	30-Nov-15	4000					
16	16-Dec-15	3400					
17	11-Mar-16	4000					
18	23-Jun-16	3800					
19	23-Sep-16	2600					
20	23-Dec-16	3900					
21	17-Feb-17	4100					
22	20-Jun-17	3600	3600				
23	5-Sep-17	3100	3100				
24	24-Nov-17	2800	2800				
25	28-Mar-18	3500	3500				
26	28-Jun-18	3700	3700				
27	24-Sep-18	2800	2800				
28	25-Oct-18	2400	2400				
29	20-Feb-19	1800	1800				
30							
Coefficient of Variation:		0.31	0.22				
Mann-Kendall Statistic (S):		109	-15				
Confidence Factor:		97.9%	95.8%				
Concentration Trend:		Increasing	Decreasing				

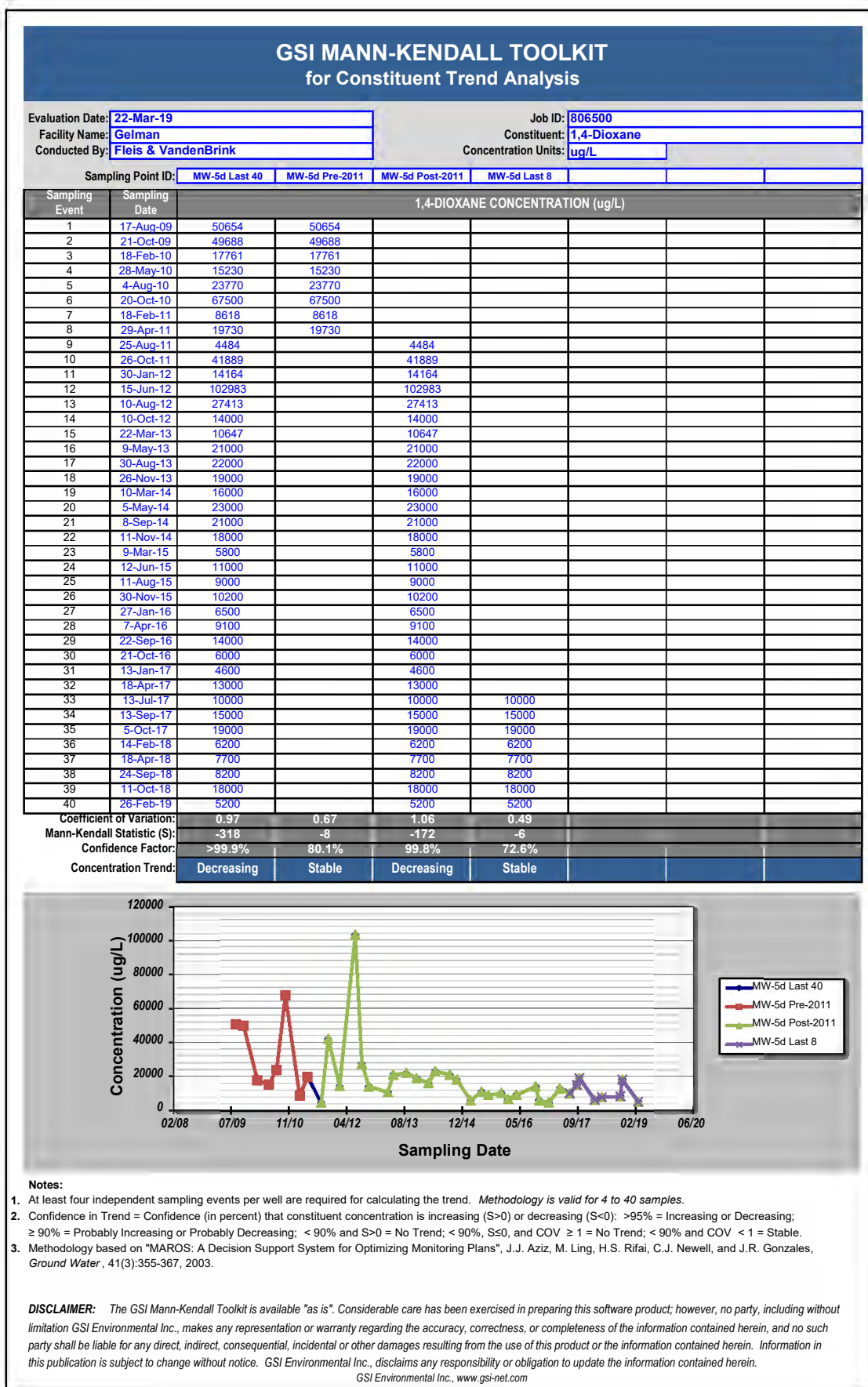


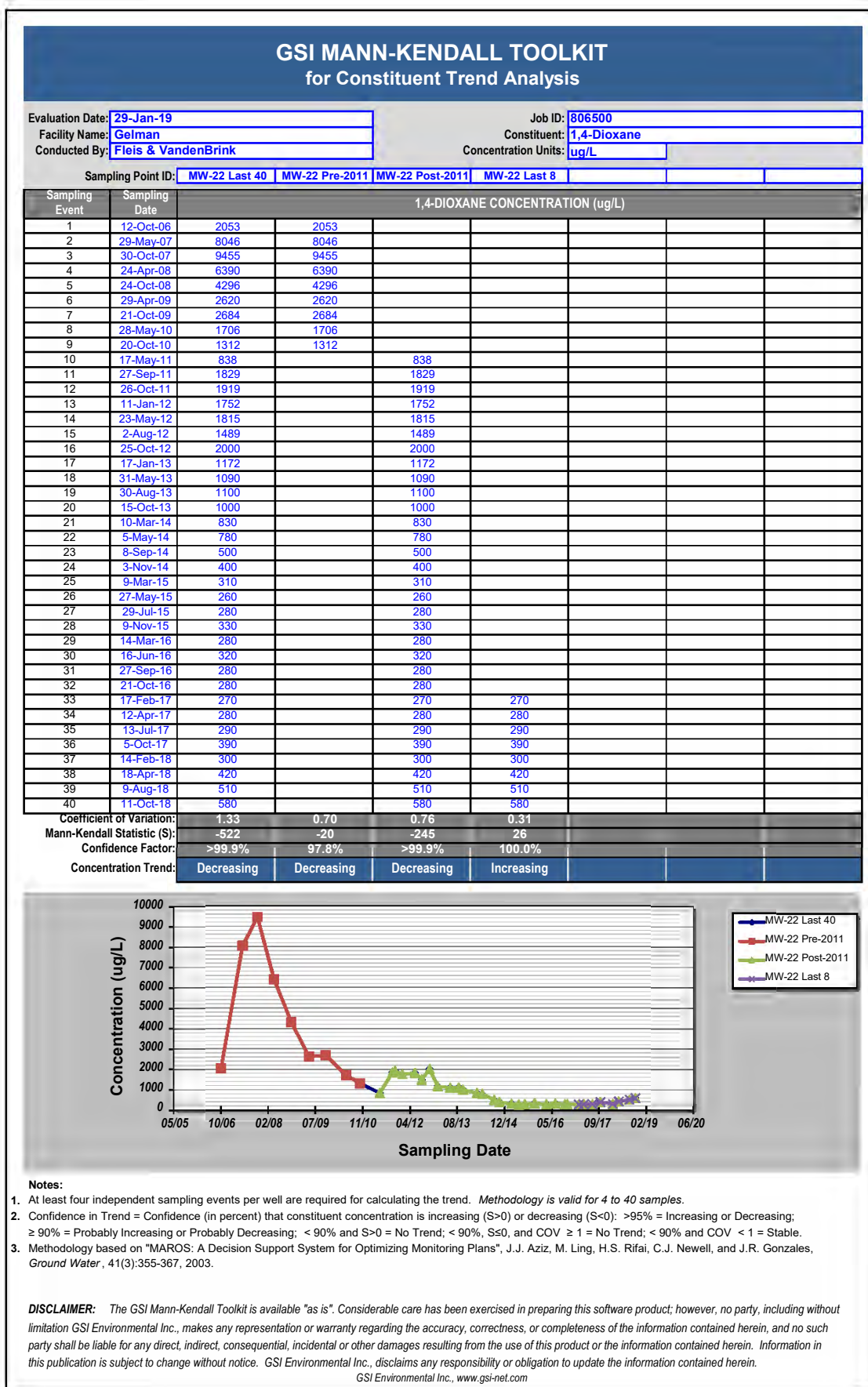
### Notes:

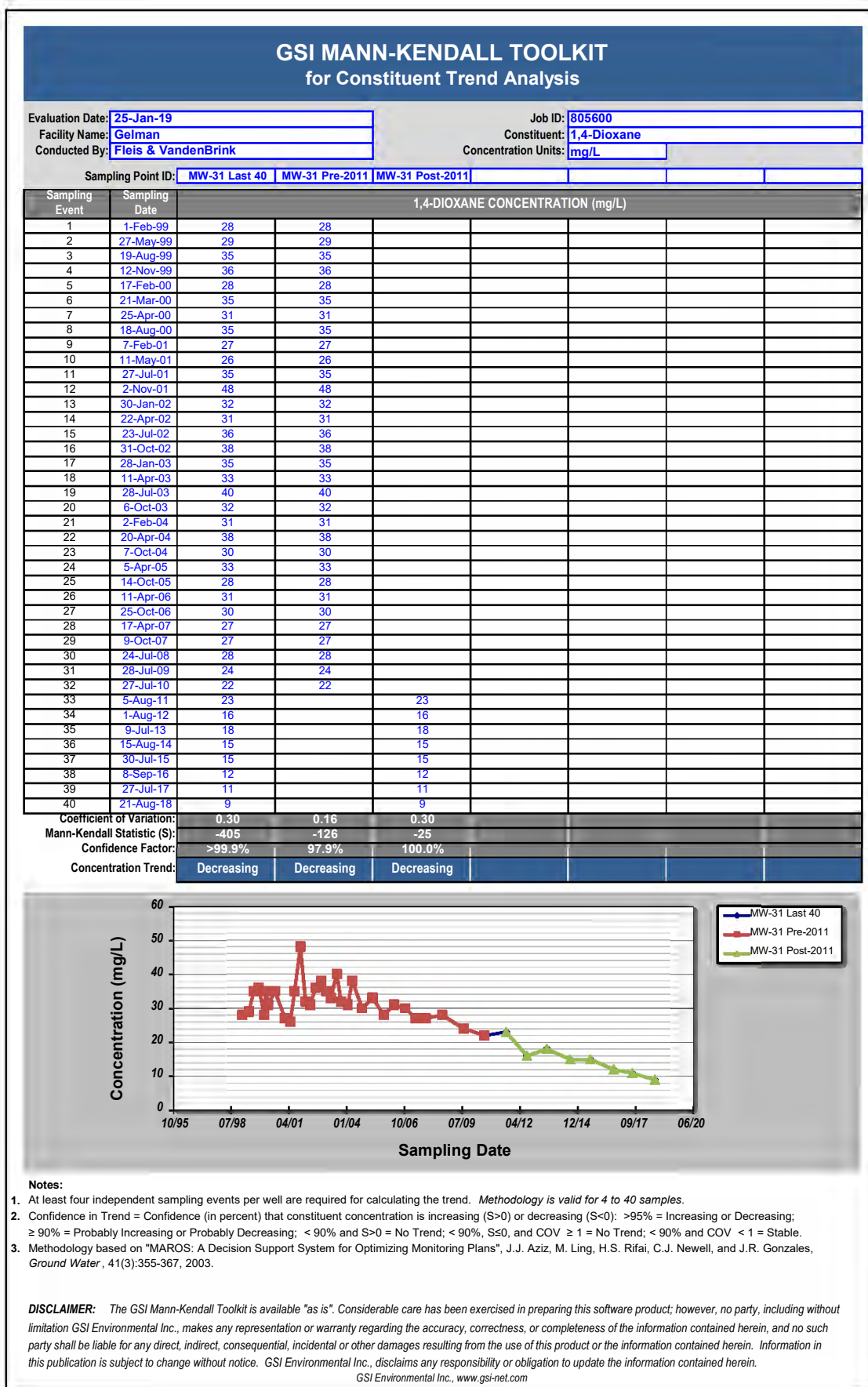
- At least four independent sampling events per well are required for calculating the trend. *Methodology is valid for 4 to 40 samples.*
- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing ( $S > 0$ ) or decreasing ( $S < 0$ );  $> 95\%$  = Increasing or Decreasing;  $\geq 90\%$  = Probably Increasing or Probably Decreasing;  $< 90\%$  and  $S > 0$  = No Trend;  $< 90\%$ ,  $S \leq 0$ , and  $COV \geq 1$  = No Trend;  $< 90\%$  and  $COV < 1$  = Stable.
- Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

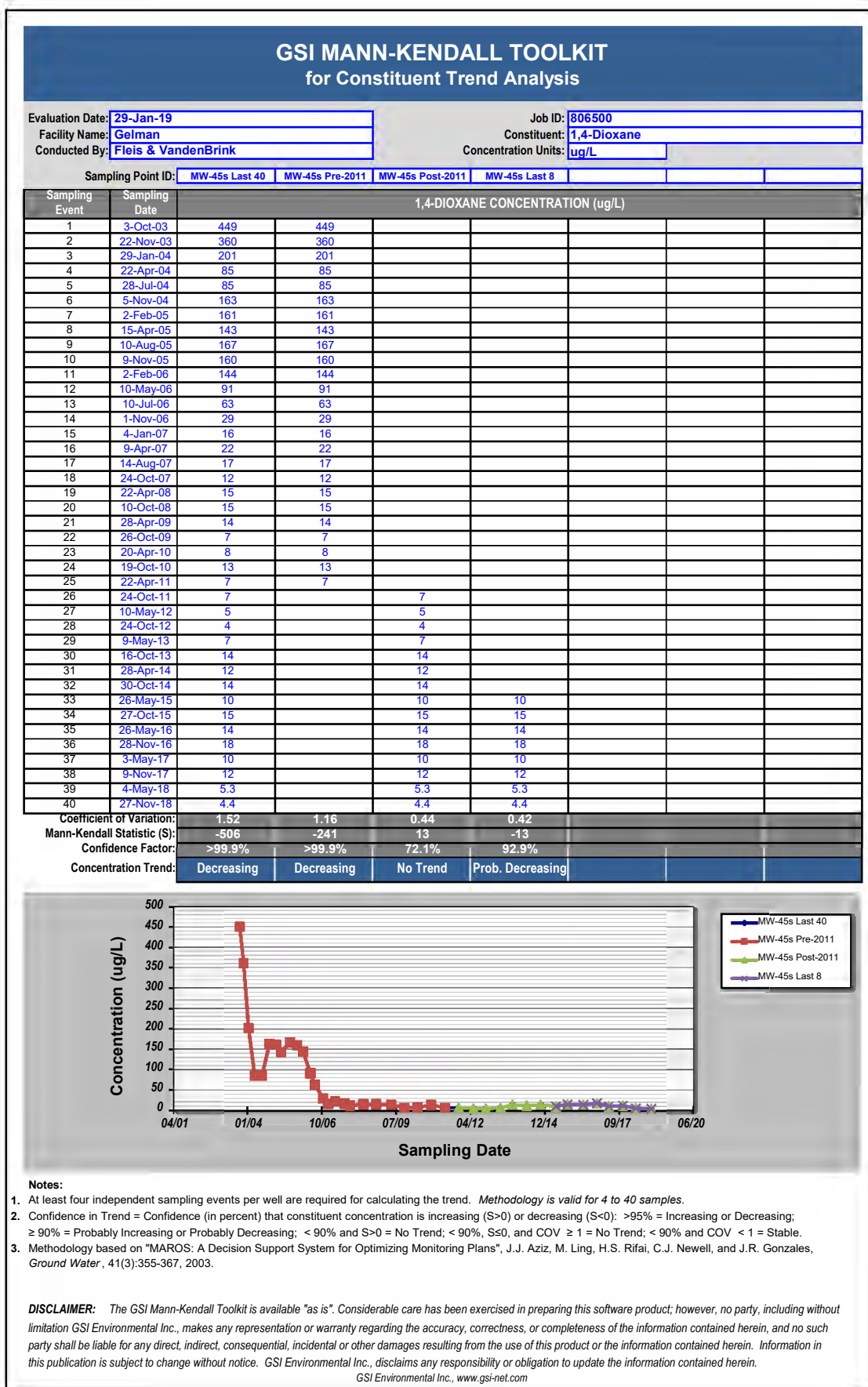
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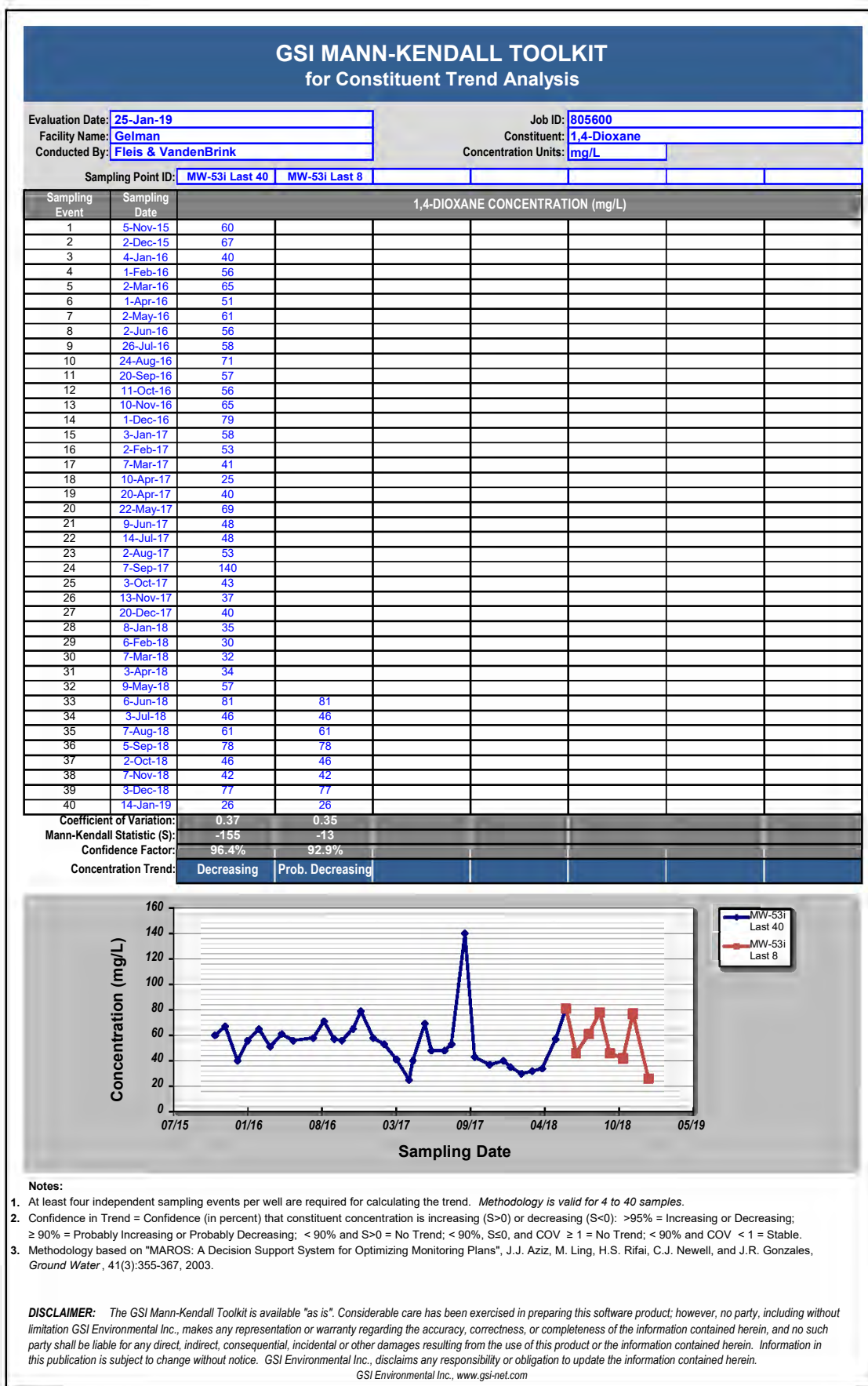
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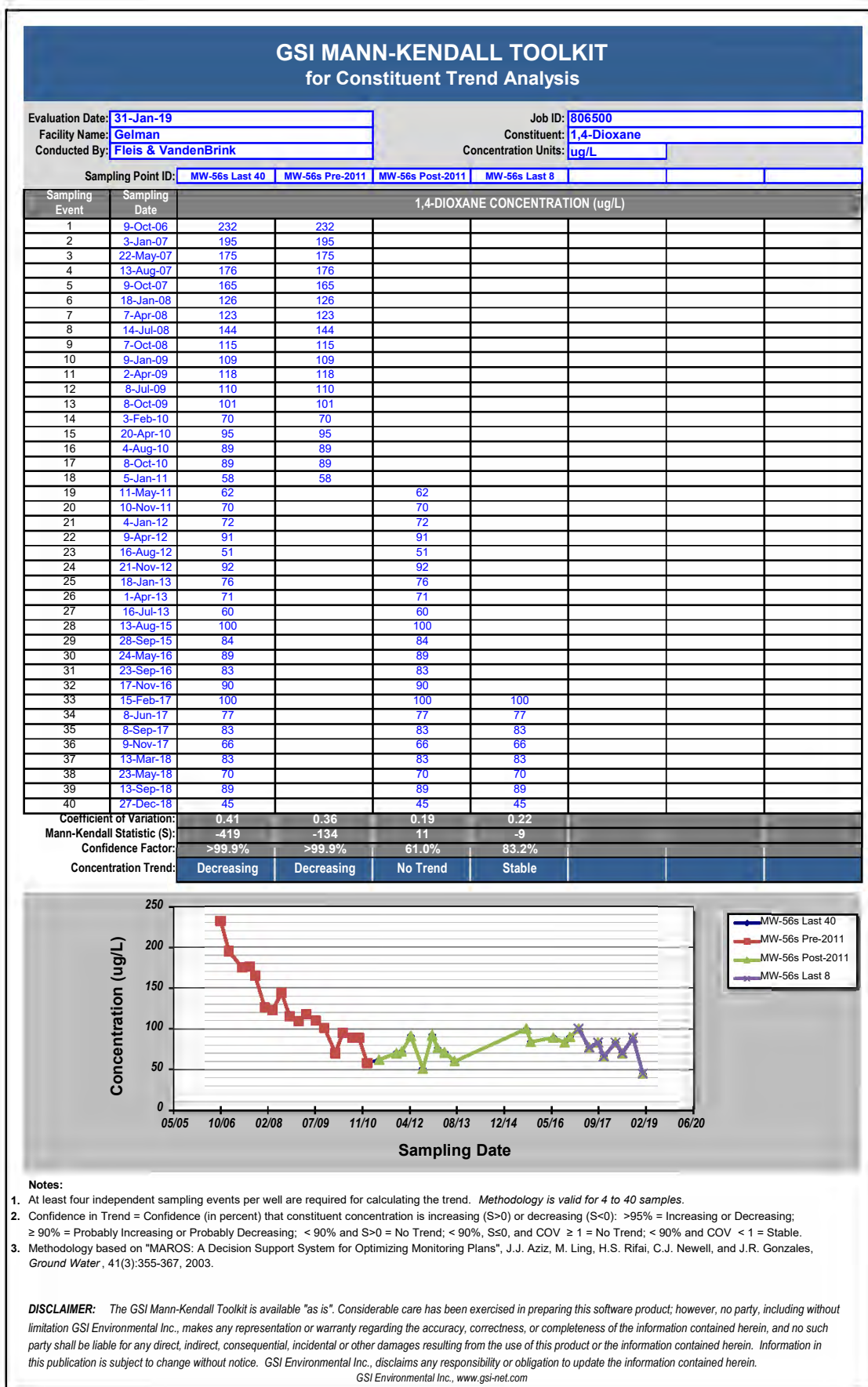


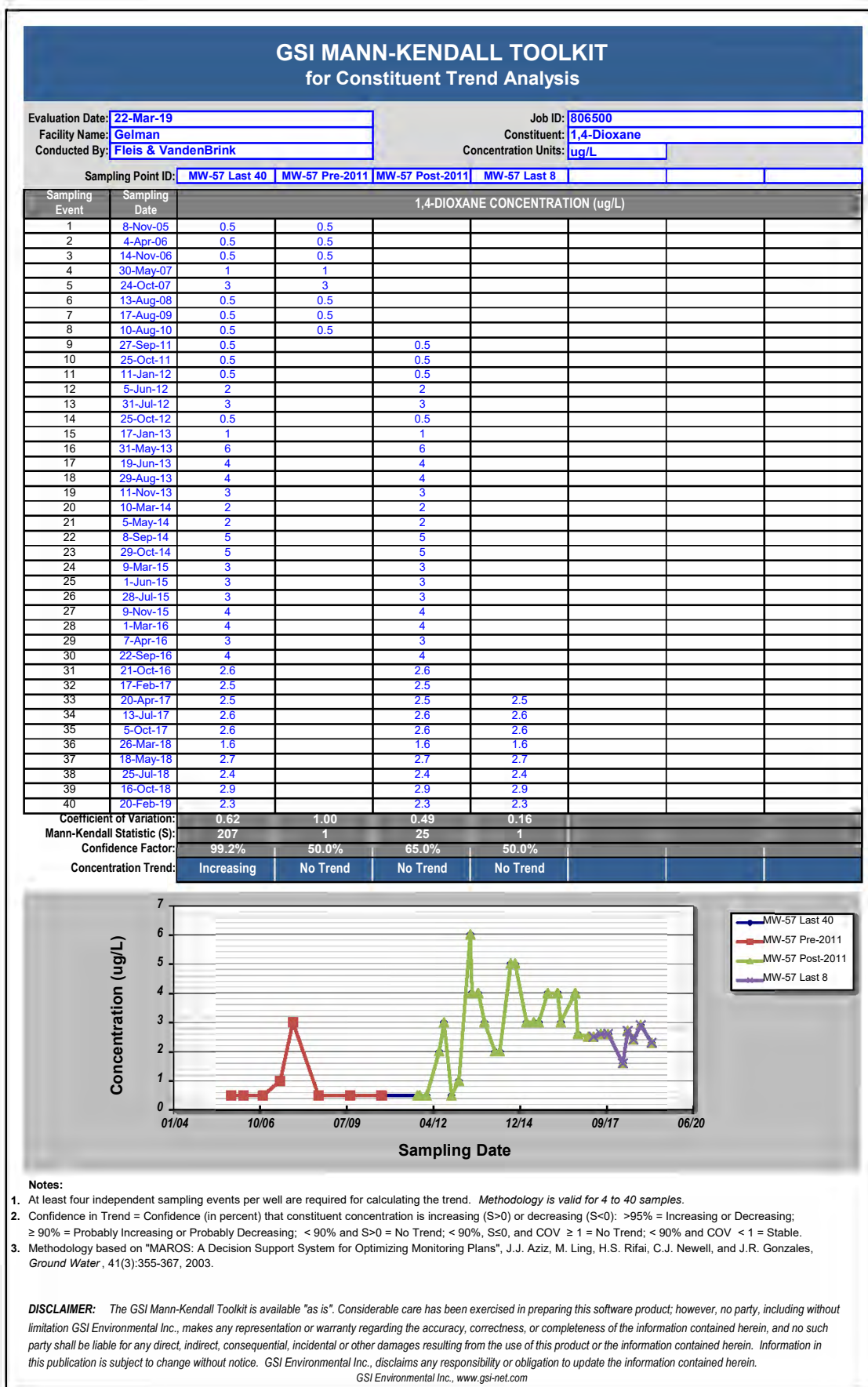


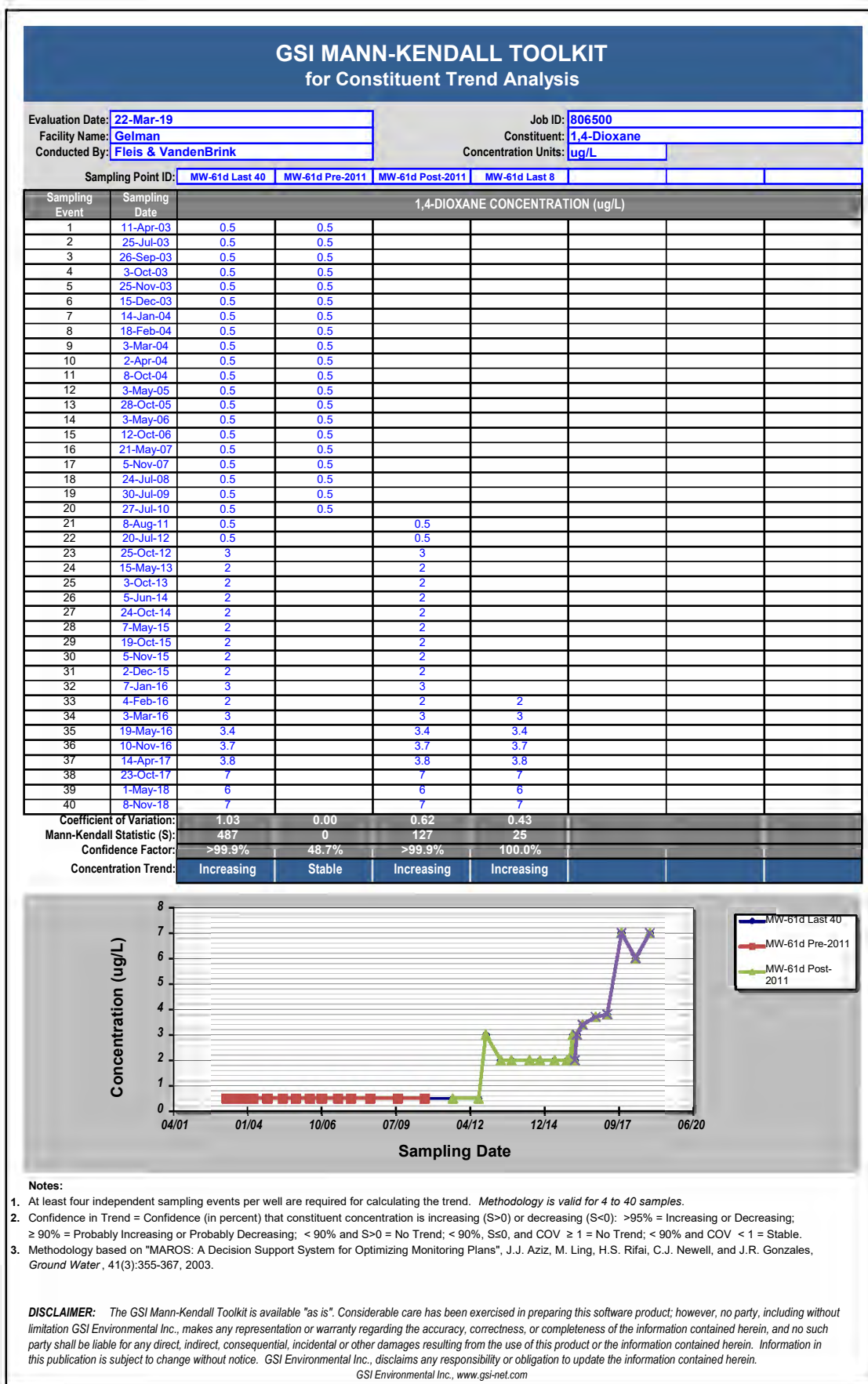


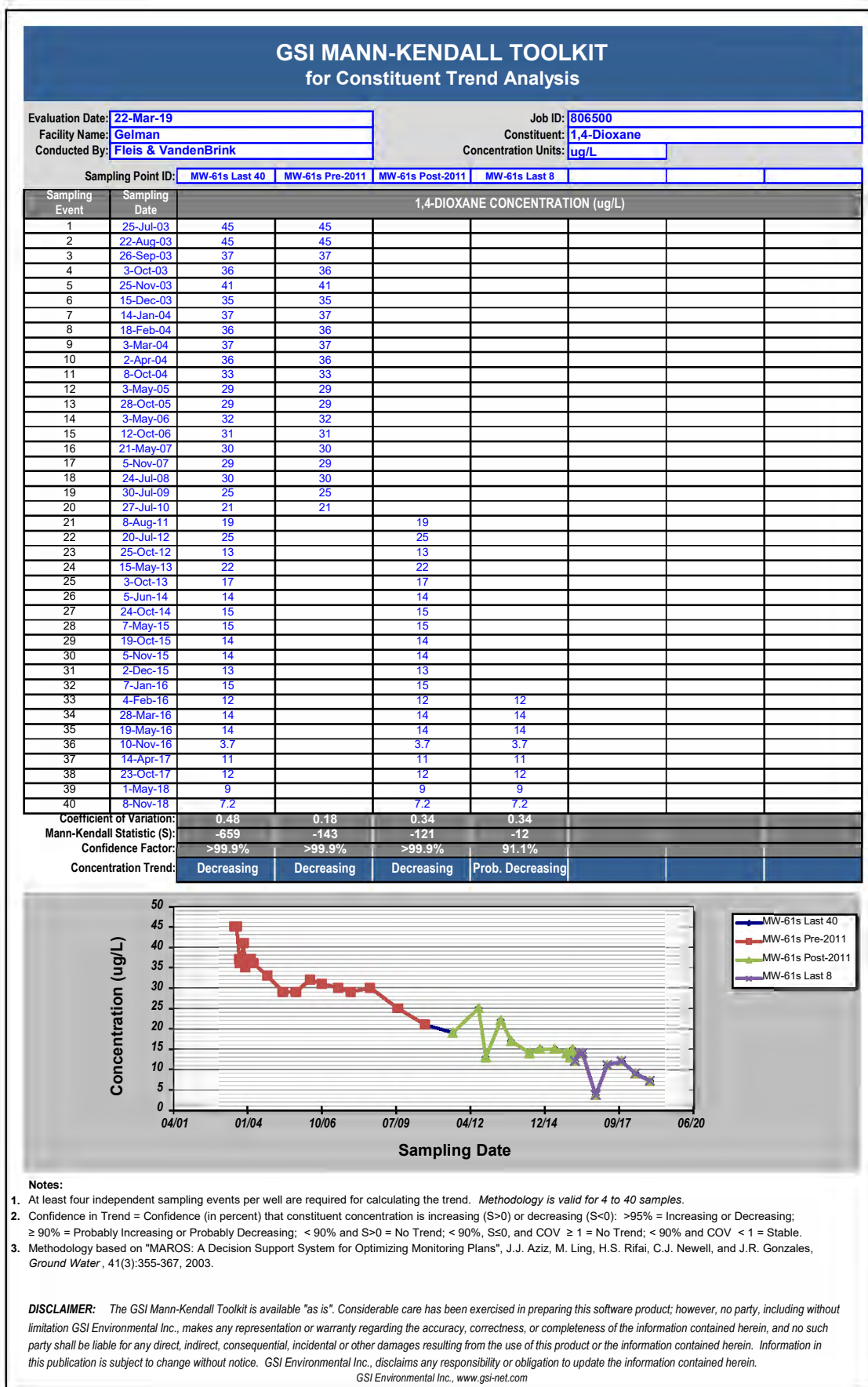


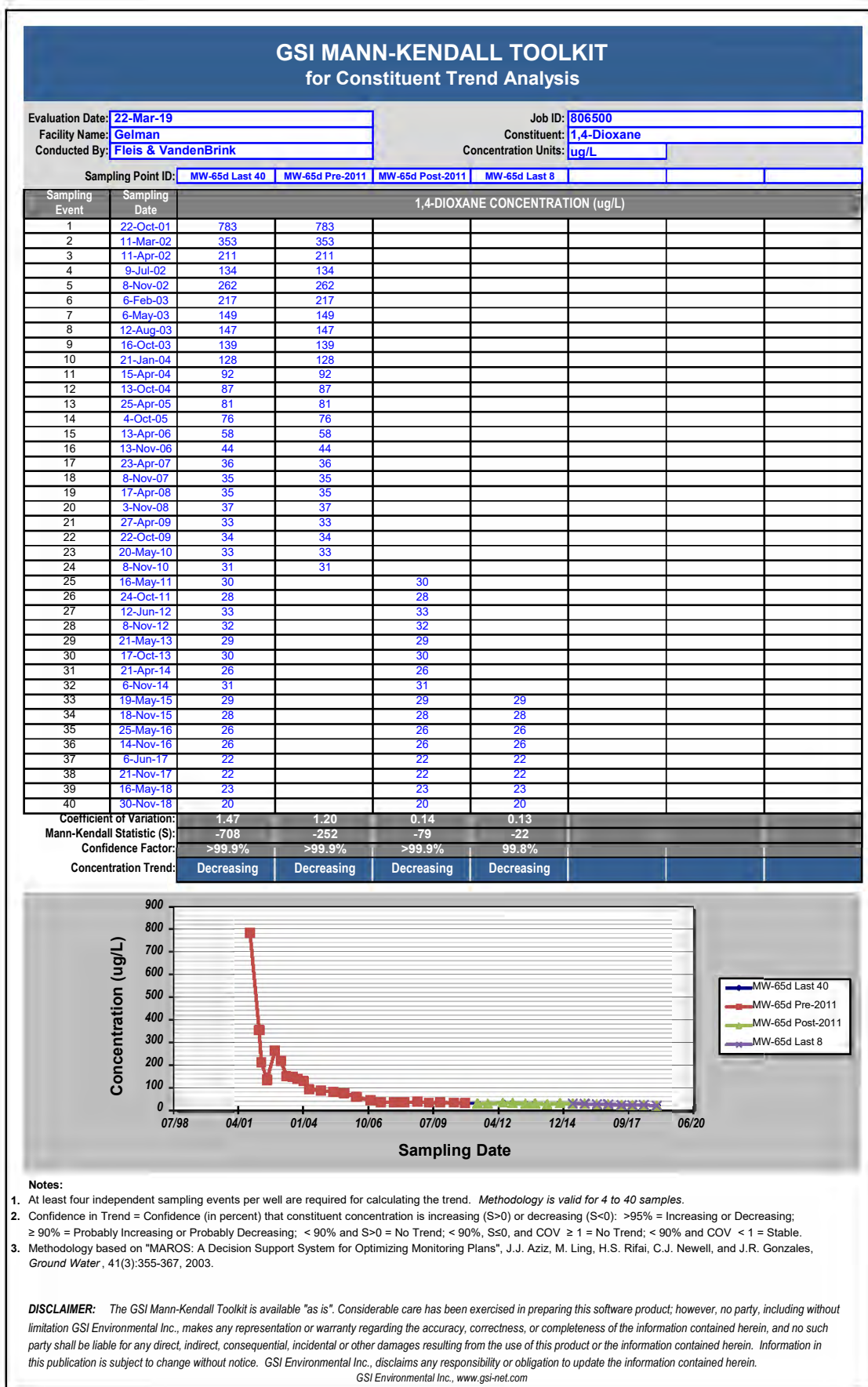


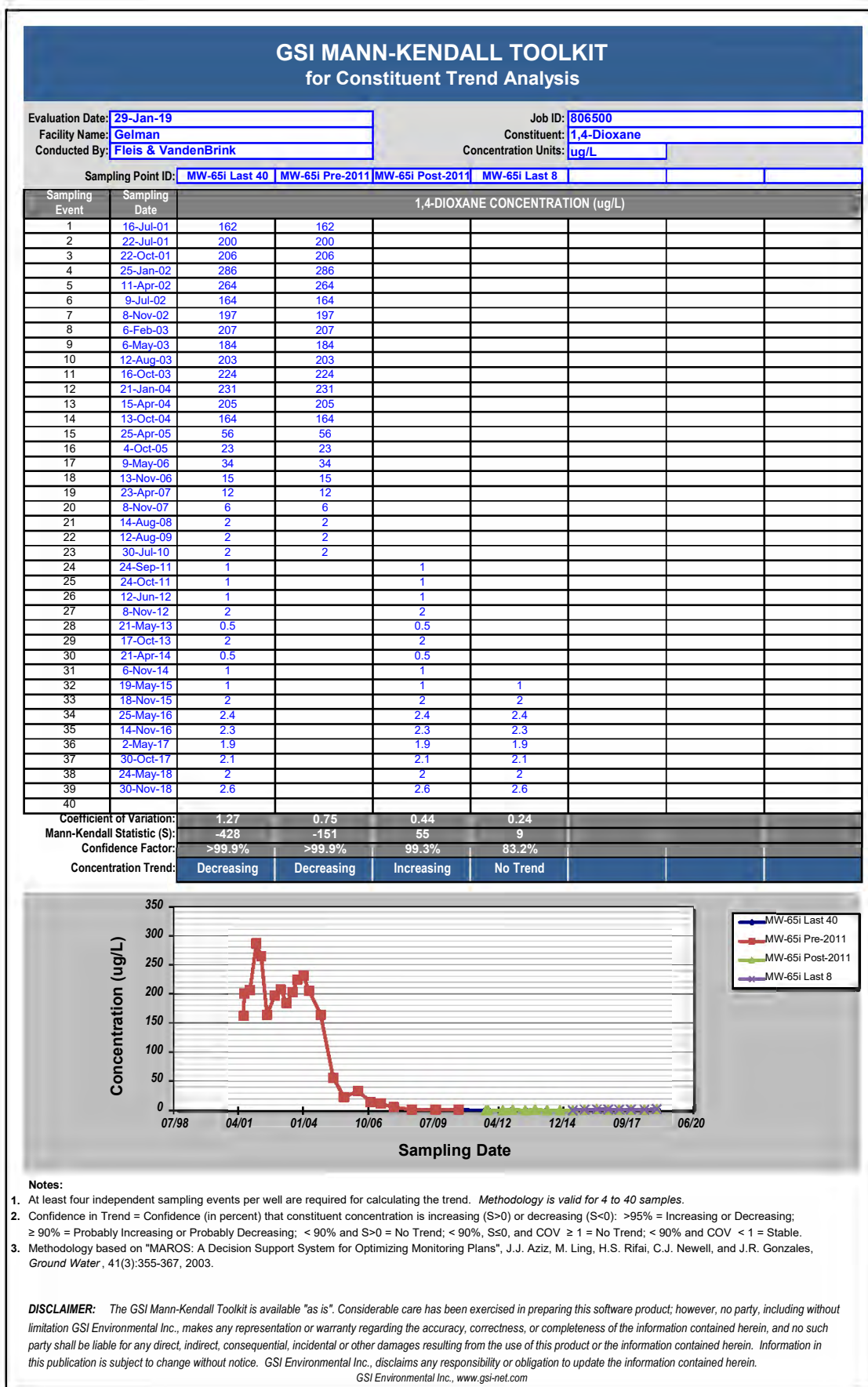


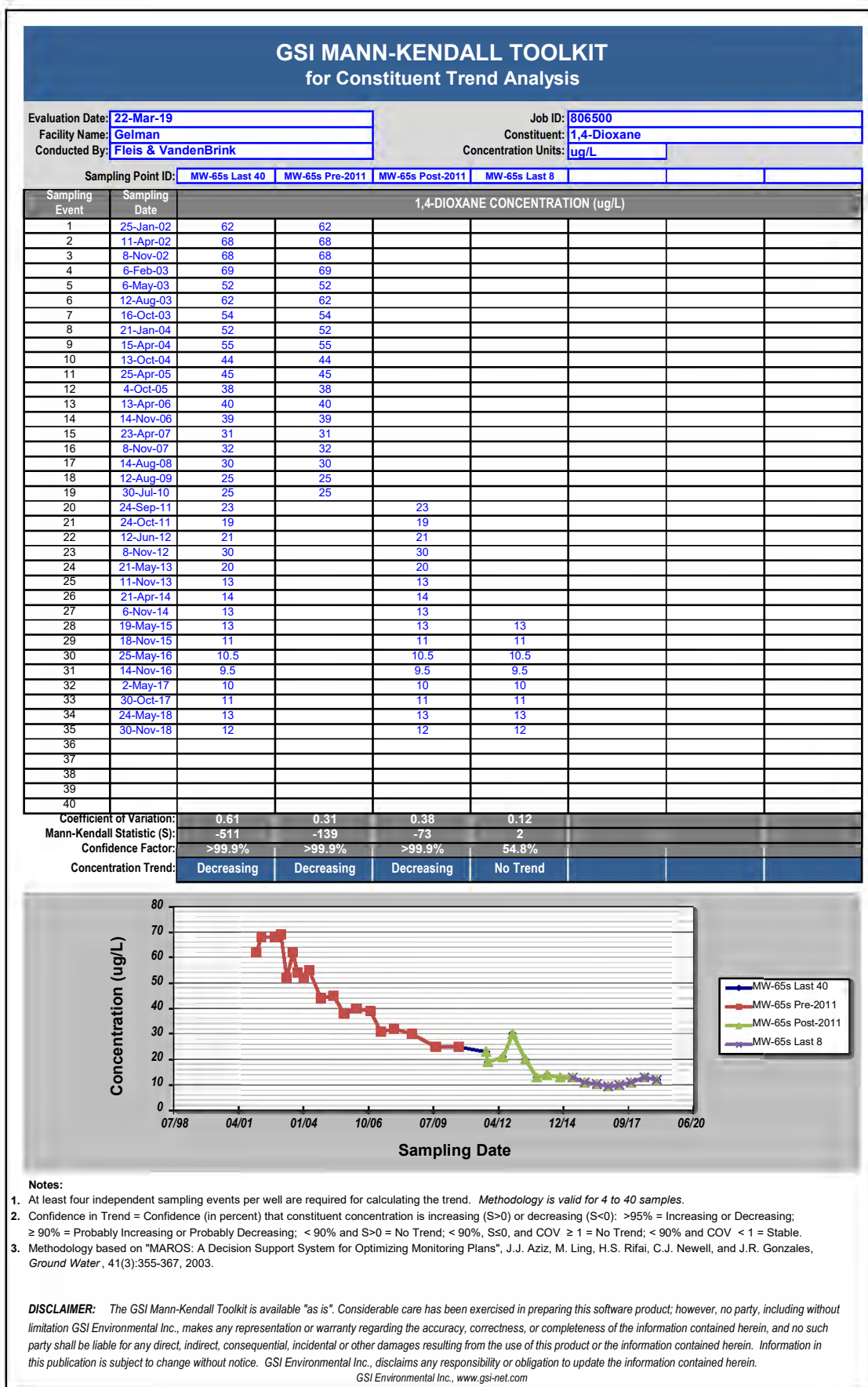


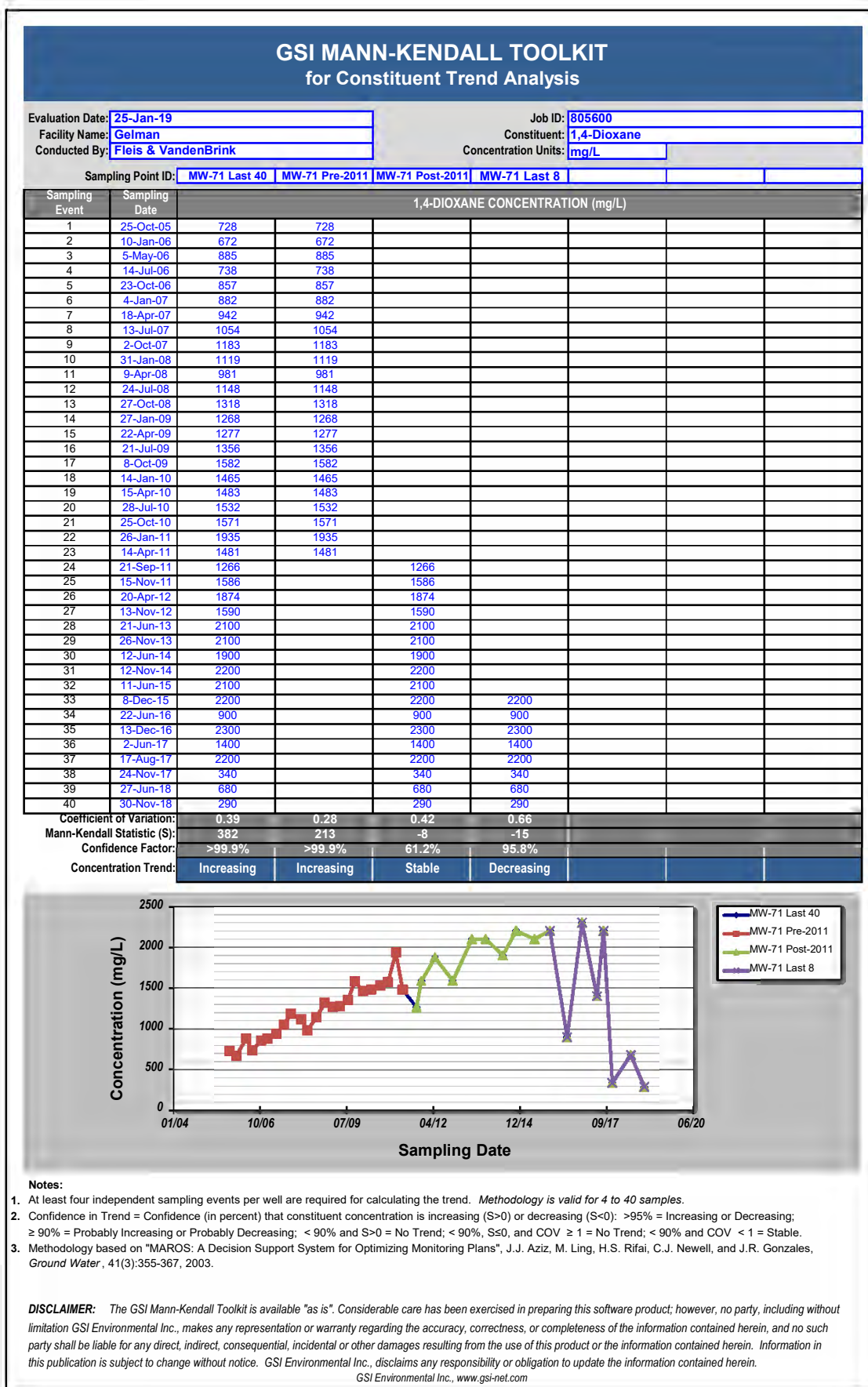


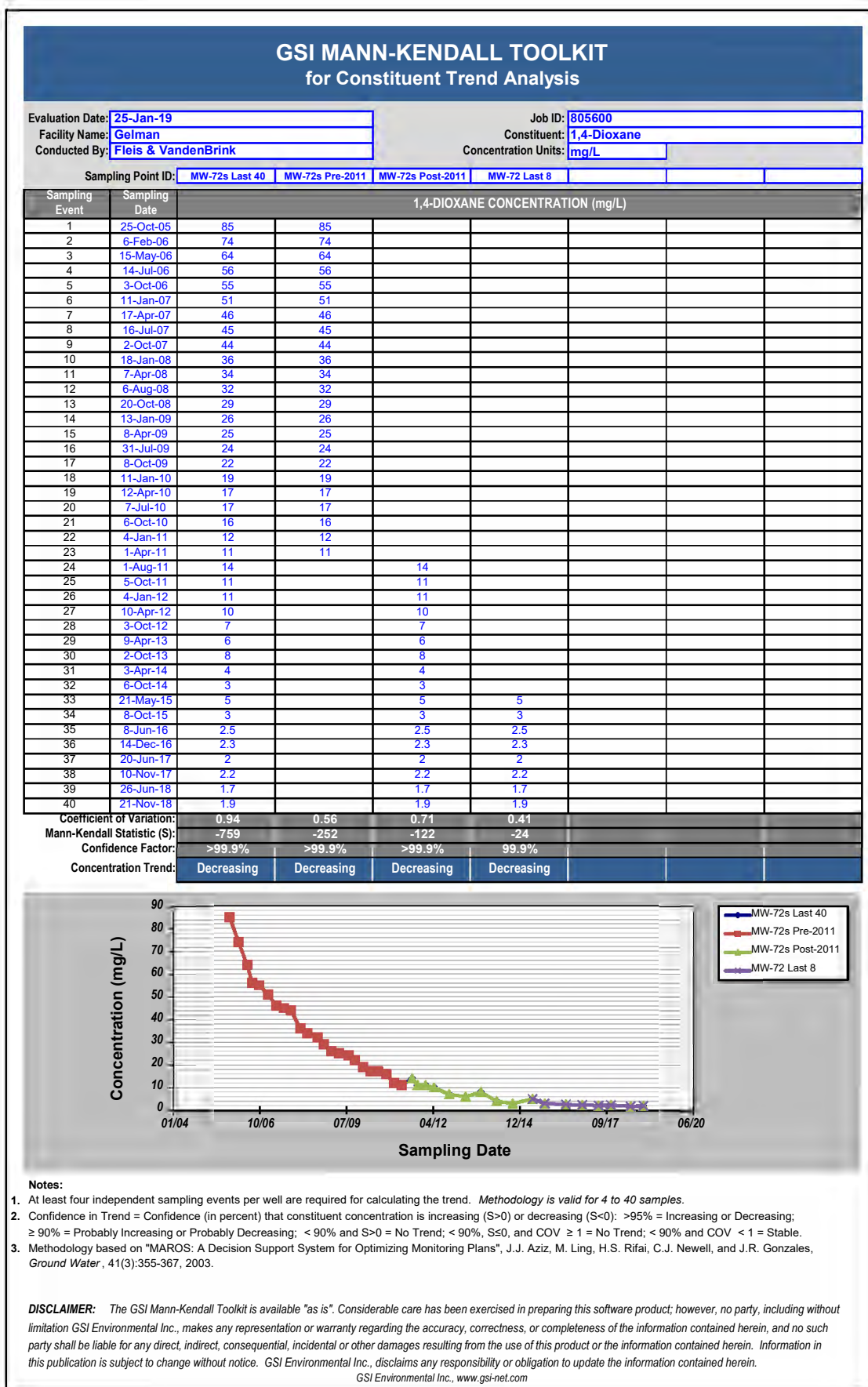


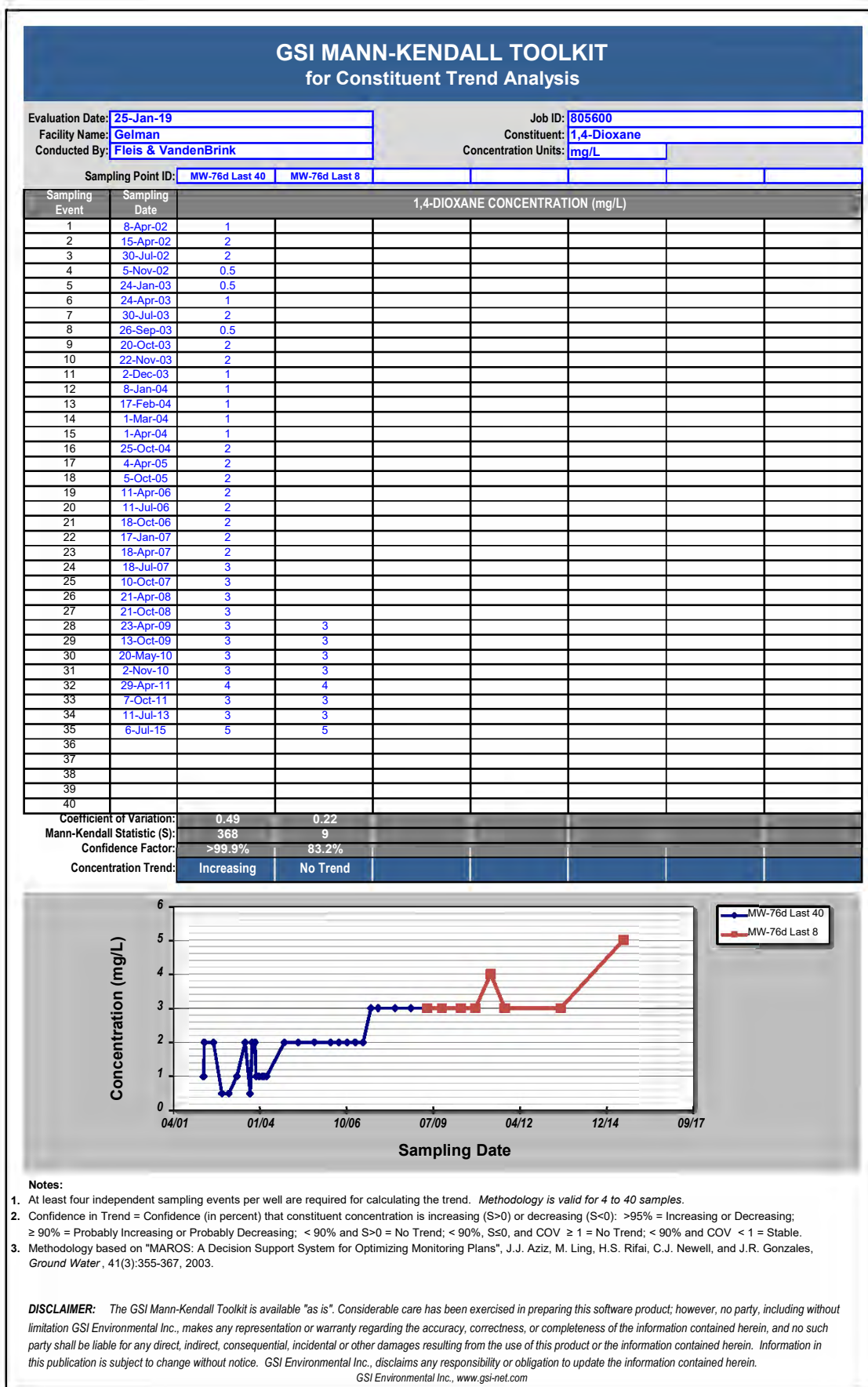


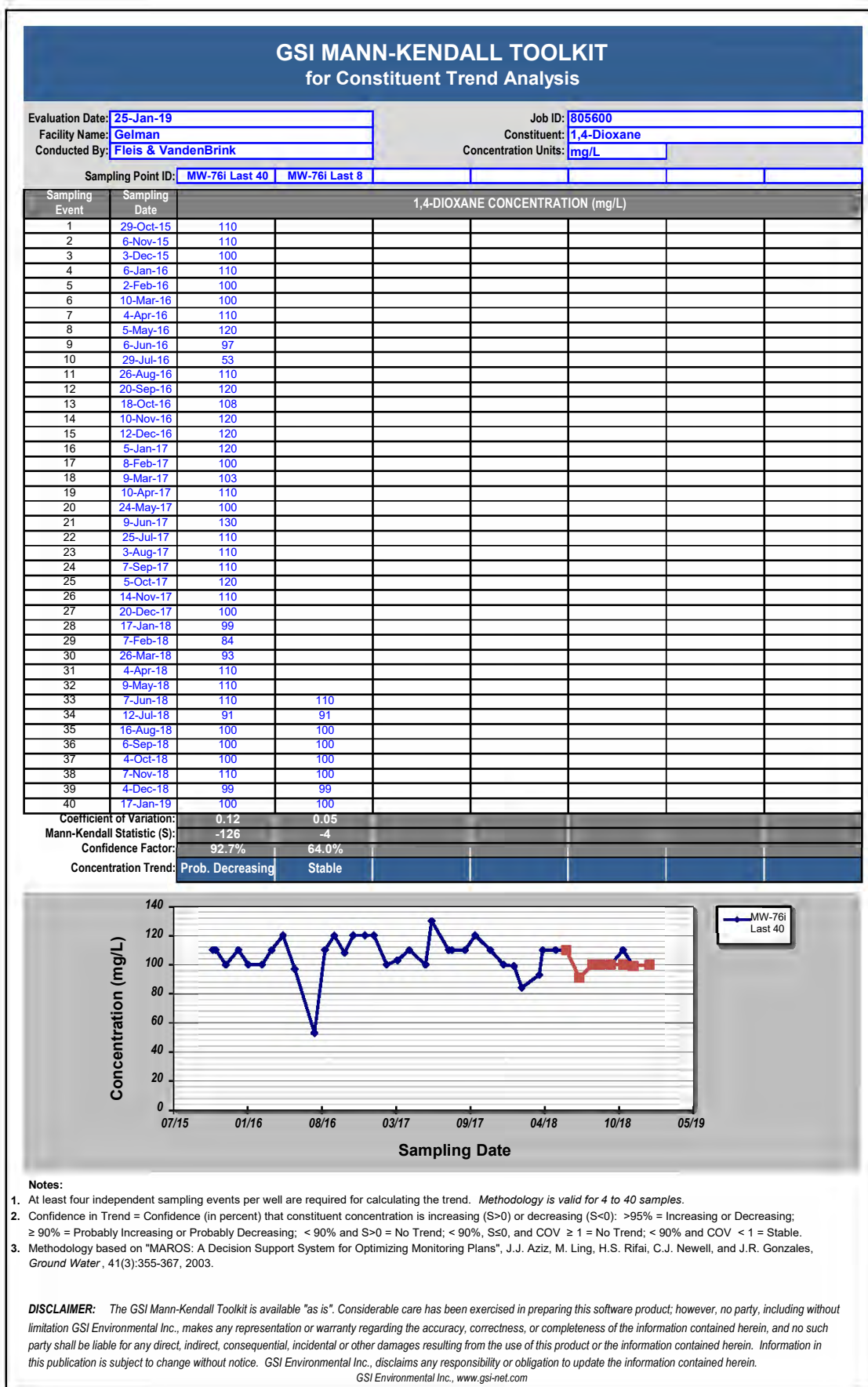


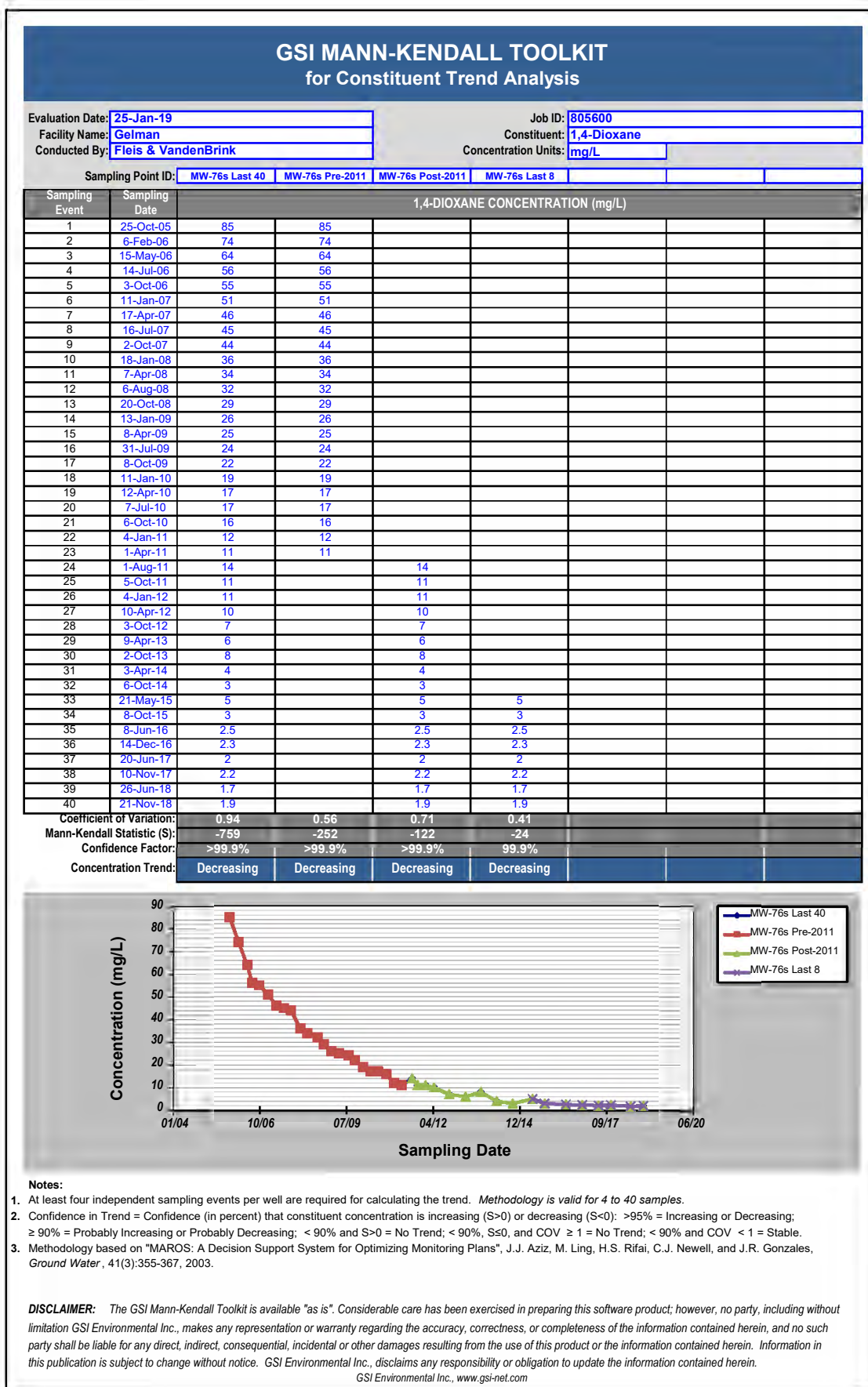


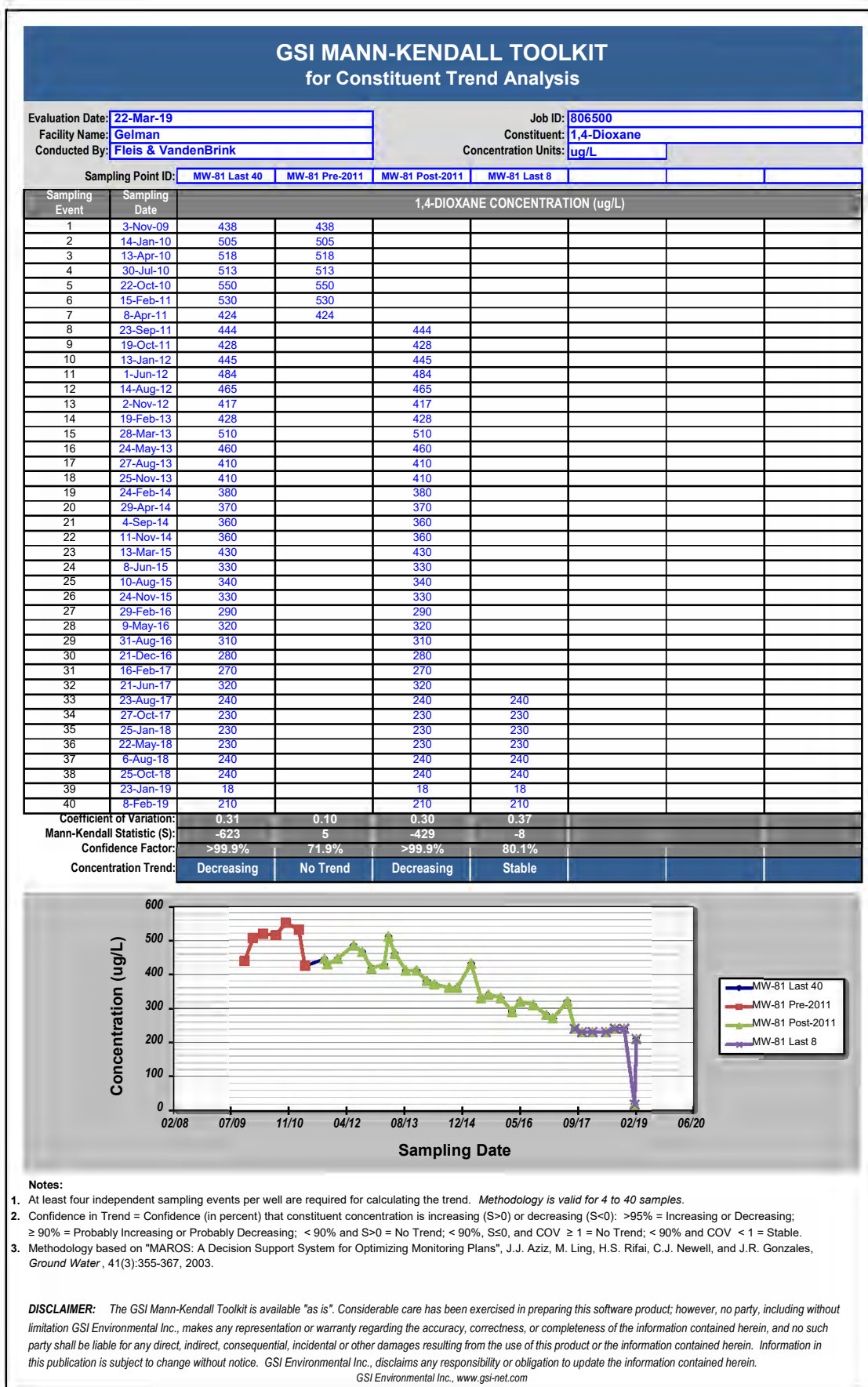










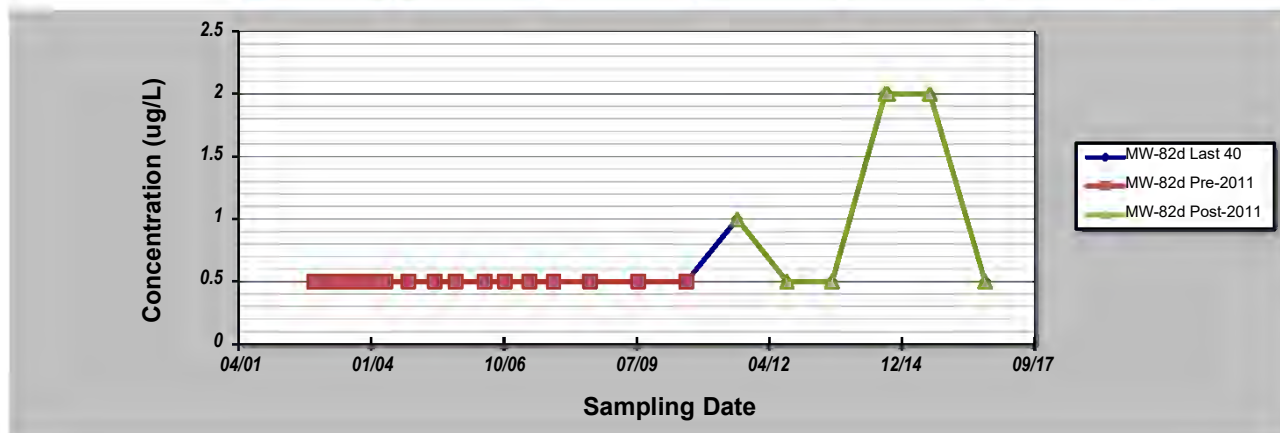


## GSI MANN-KENDALL TOOLKIT for Constituent Trend Analysis

Evaluation Date: <b>22-Mar-19</b>	Job ID: <b>806500</b>
Facility Name: <b>Gelman</b>	Constituent: <b>1,4-Dioxane</b>
Conducted By: <b>Fleis &amp; VandenBrink</b>	Concentration Units: <b>ug/L</b>

Sampling Point ID:	MW-82d Last 40	MW-82d Pre-2011	MW-82d Post-2011		
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Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)					
1	7-Nov-02	0.5	0.5				
2	3-Feb-03	0.5	0.5				
3	29-Apr-03	0.5	0.5				
4	8-Aug-03	0.5	0.5				
5	22-Oct-03	0.5	0.5				
6	16-Jan-04	0.5	0.5				
7	30-Apr-04	0.5	0.5				
8	21-Oct-04	0.5	0.5				
9	5-May-05	0.5	0.5				
10	10-Oct-05	0.5	0.5				
11	15-May-06	0.5	0.5				
12	18-Oct-06	0.5	0.5				
13	19-Apr-07	0.5	0.5				
14	17-Oct-07	0.5	0.5				
15	18-Jul-08	0.5	0.5				
16	15-Jul-09	0.5	0.5				
17	15-Jul-10	0.5	0.5				
18	2-Aug-11	1		1			
19	10-Aug-12	0.5		0.5			
20	17-Jul-13	0.5		0.5			
21	22-Aug-14	2		2			
22	12-Sep-14	2		2			
23	24-Jul-15	2		2			
24	12-Sep-16	0.5		0.5			
25							
Coefficient of Variation:		0.72	0.00	0.62			
Mann-Kendall Statistic (S):		71	0	3			
Confidence Factor:		95.9%	48.4%	61.4%			
Concentration Trend:		Increasing	Stable	No Trend			

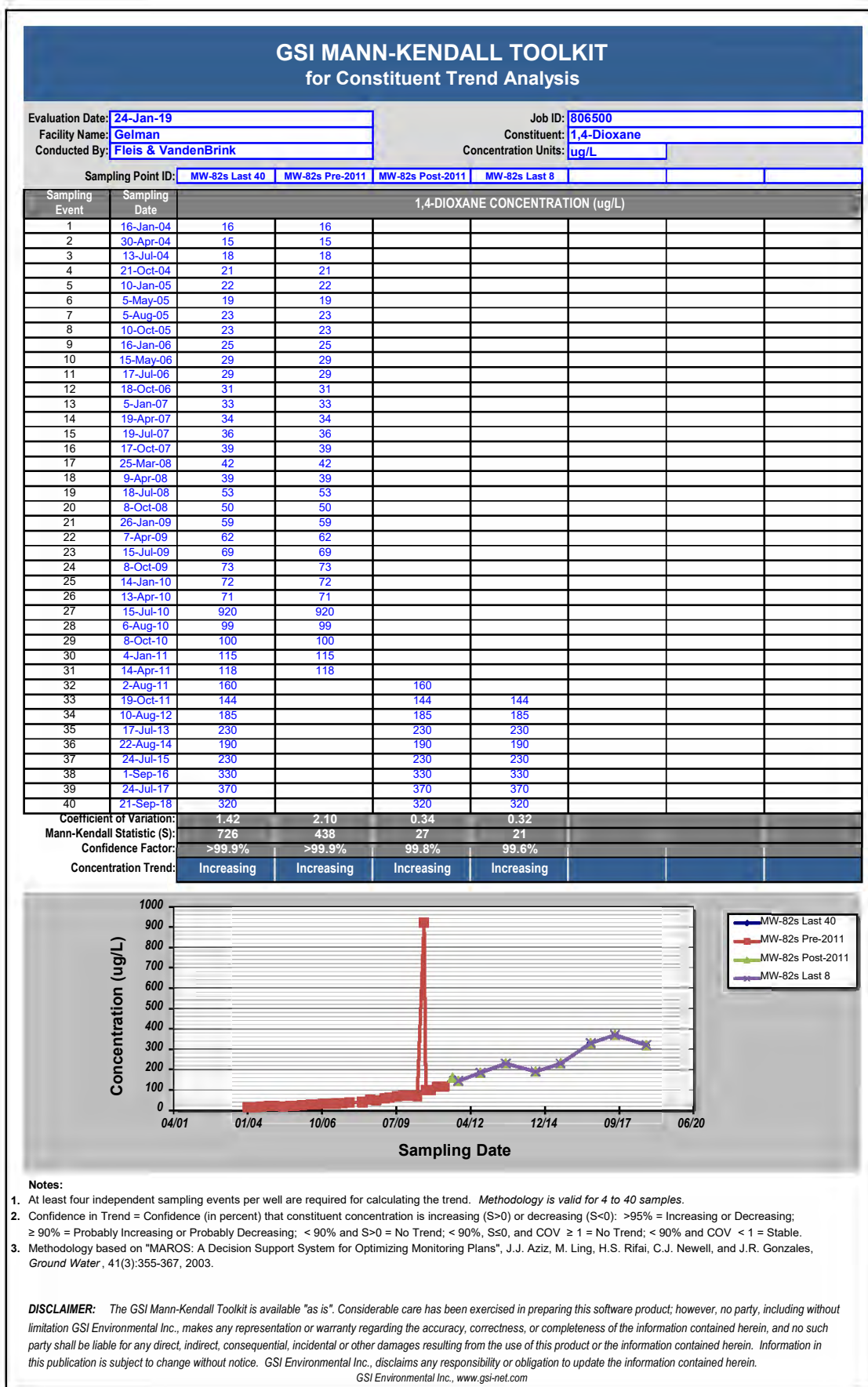


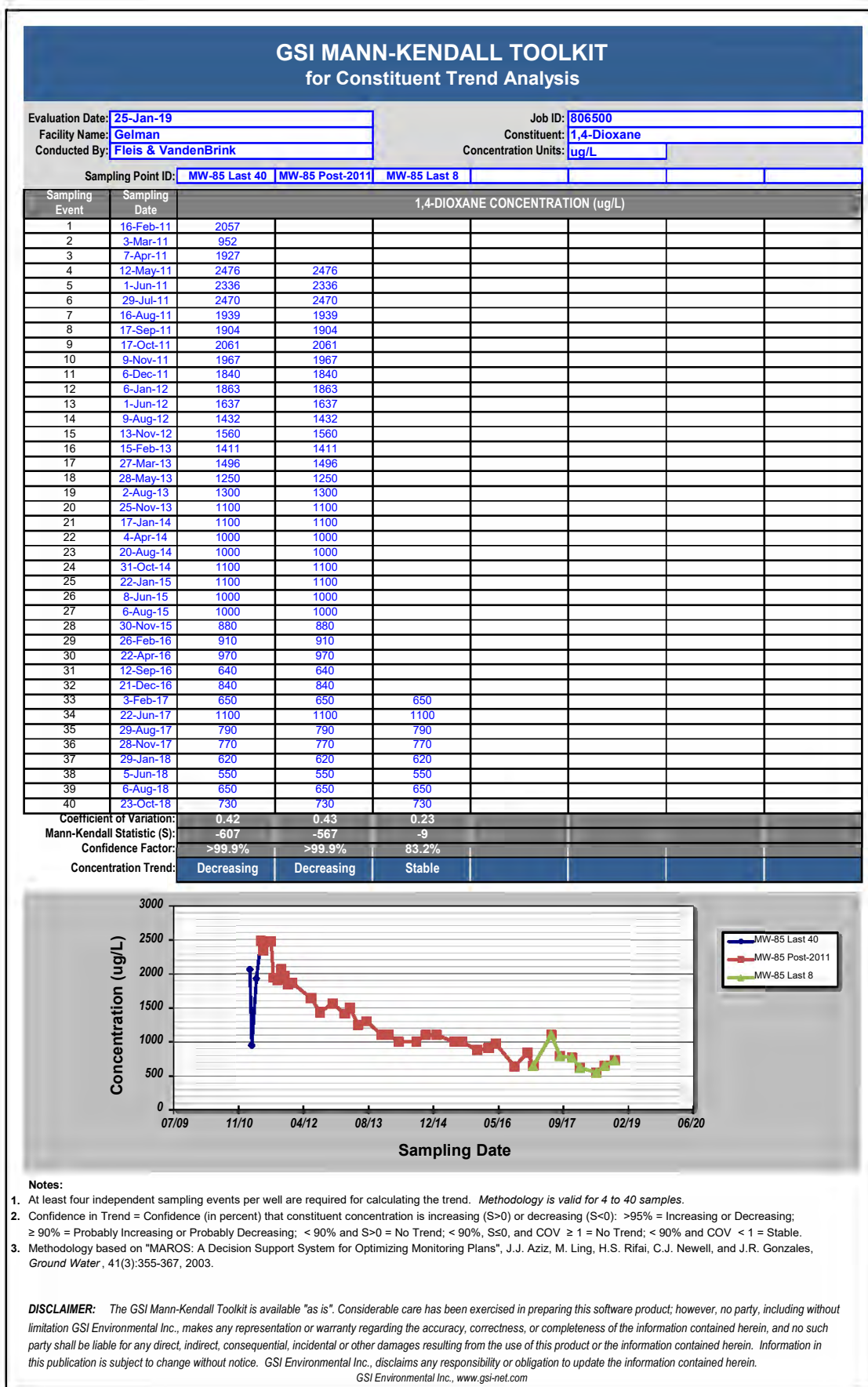
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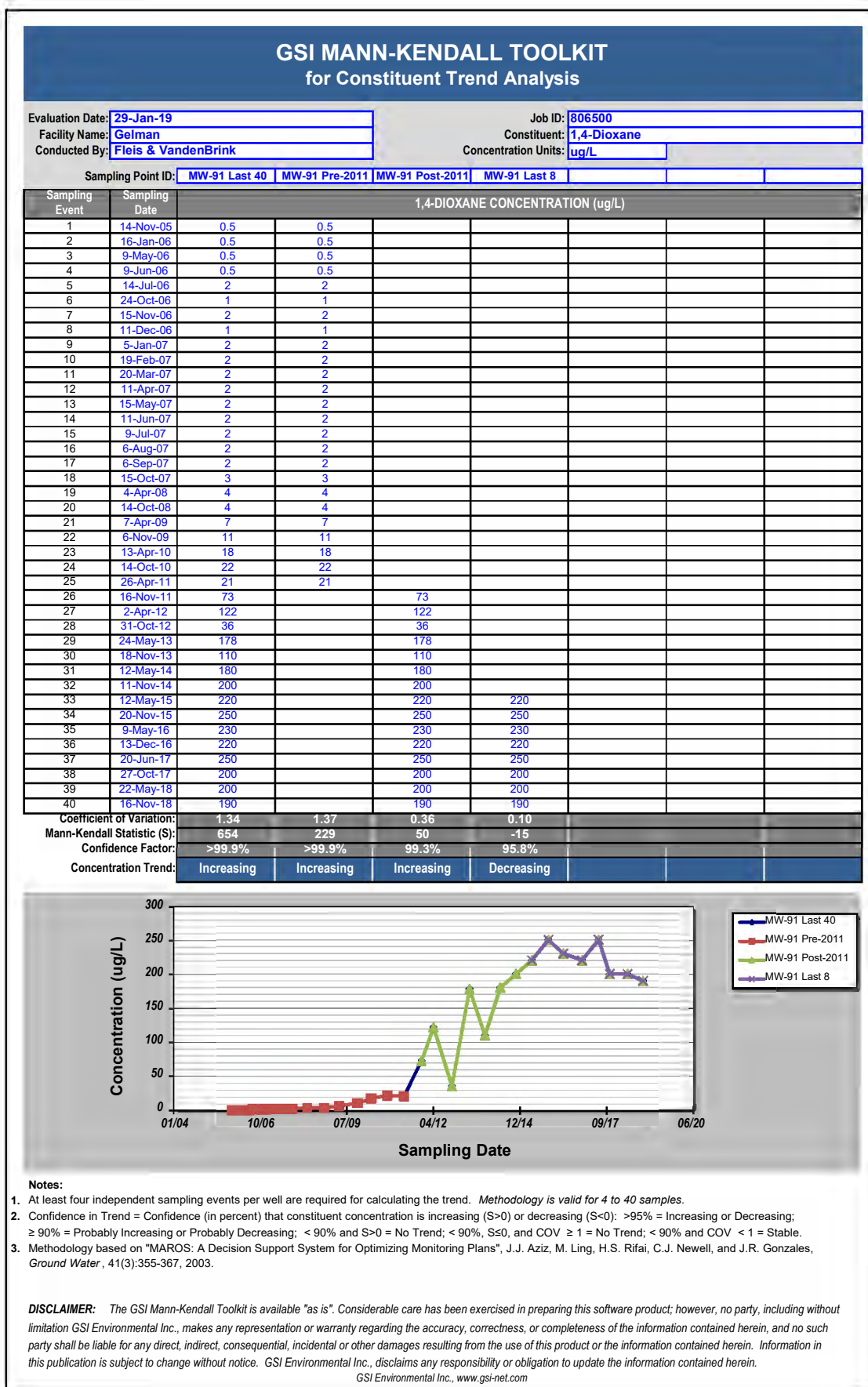
- At least four independent sampling events per well are required for calculating the trend. *Methodology is valid for 4 to 40 samples.*
- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing ( $S > 0$ ) or decreasing ( $S < 0$ ):  $> 95\%$  = Increasing or Decreasing;  $\geq 90\%$  = Probably Increasing or Probably Decreasing;  $< 90\%$  and  $S > 0$  = No Trend;  $< 90\%$ ,  $S \leq 0$ , and  $COV \geq 1$  = No Trend;  $< 90\%$  and  $COV < 1$  = Stable.
- Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

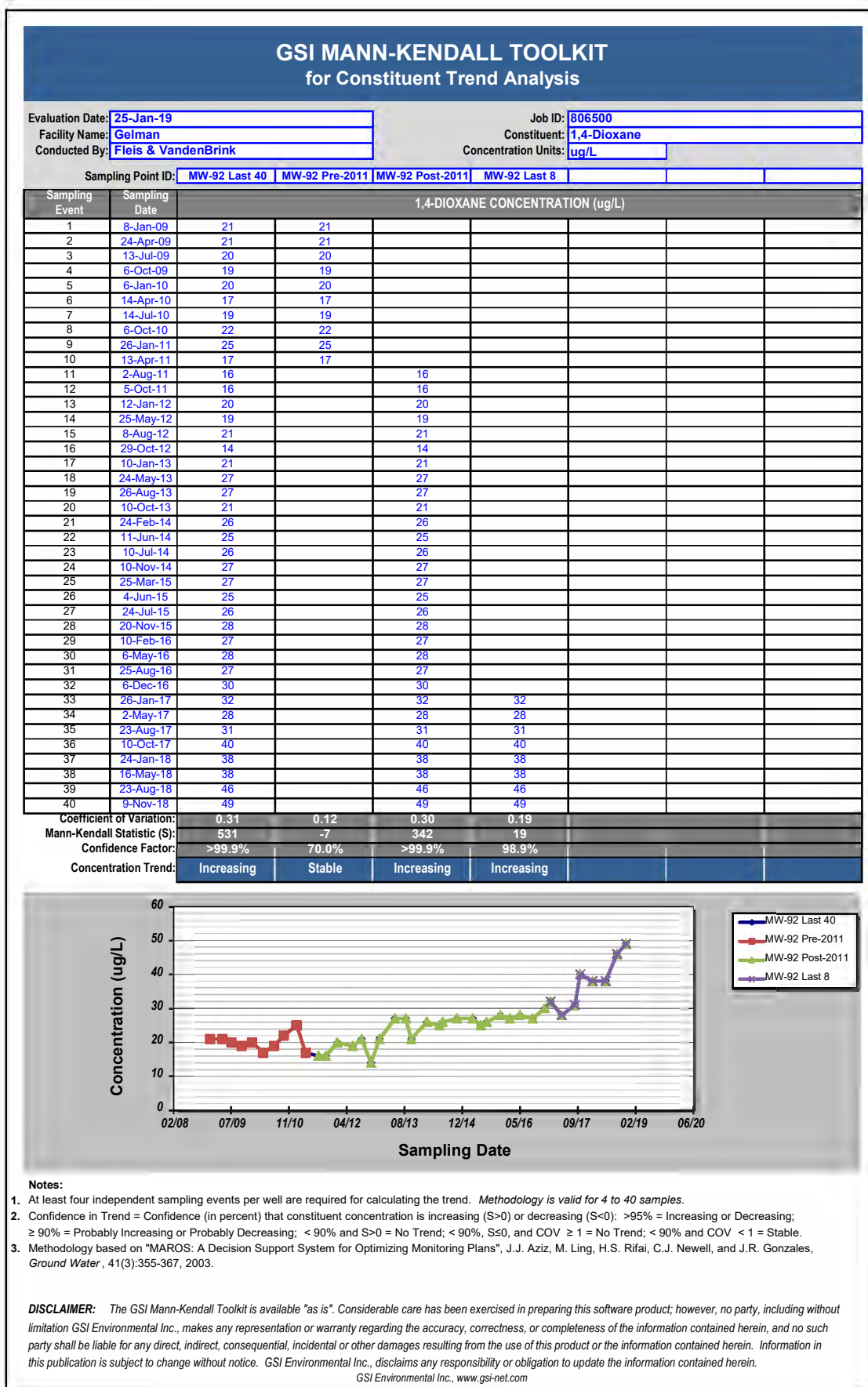
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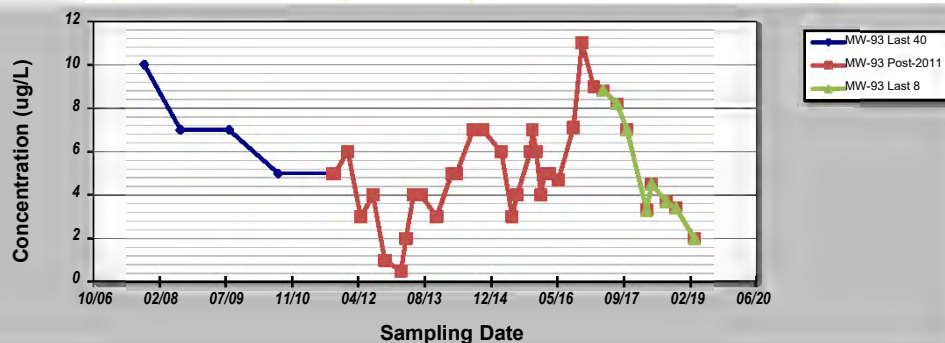


## GSI MANN-KENDALL TOOLKIT for Constituent Trend Analysis

Evaluation Date: **22-Mar-19** Job ID: **806500**  
Facility Name: **Gelman** Constituent: **1,4-Dioxane**  
Conducted By: **Fleis & VandenBrink** Concentration Units: **ug/L**

Sampling Point ID: **MW-93 Last 40** **MW-93 Post-2011** **MW-93 Last 8**

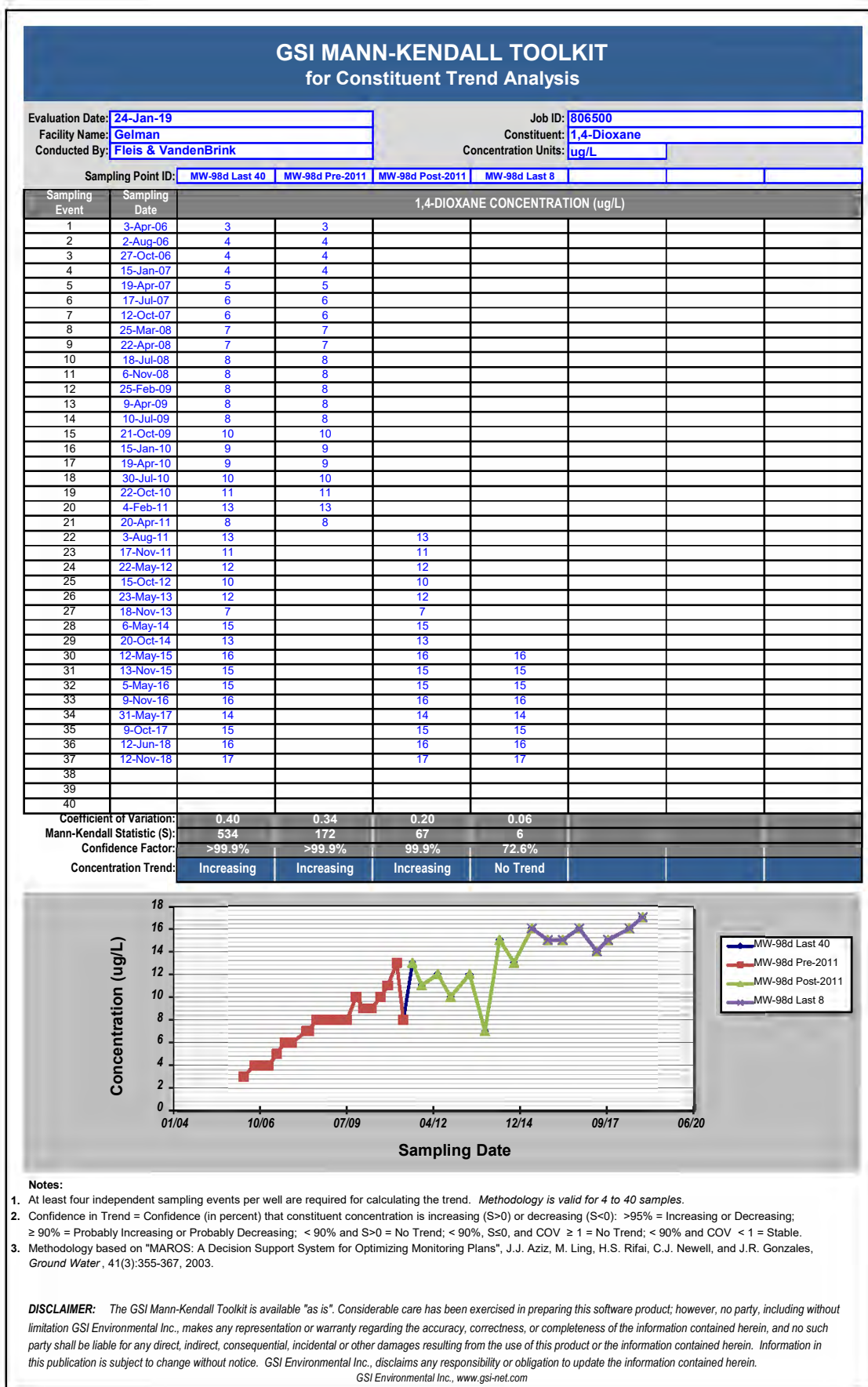
Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)					
1	30-Oct-07	10					
2	29-Jul-08	7					
3	30-Jul-09	7					
4	5-Aug-10	5					
5	17-Sep-11	5	5				
6	6-Oct-11	5	5				
7	10-Jan-12	6	6				
8	18-Apr-12	3	3				
9	19-Jul-12	4	4				
10	17-Oct-12	1	1				
11	13-Feb-13	0.5	0.5				
12	26-Mar-13	2	2				
13	20-May-13	4	4				
14	18-Jul-13	4	4				
15	11-Nov-13	3	3				
16	4-Mar-14	5	5				
17	9-Apr-14	5	5				
18	13-Aug-14	7	7				
19	24-Oct-14	7	7				
20	12-Mar-15	6	6				
21	2-Jun-15	3	3				
22	10-Jul-15	4	4				
23	19-Oct-15	6	6				
24	3-Nov-15	7	7				
25	2-Dec-15	6	6				
26	6-Jan-16	4	4				
27	2-Feb-16	5	5				
28	9-Mar-16	5	5				
29	19-May-16	4.7	4.7				
30	8-Sep-16	7.1	7.1				
31	10-Nov-16	11	11				
32	7-Feb-17	9	9				
33	20-Apr-17	8.8	8.8	8.8			
34	2-Aug-17	8.2	8.2	8.2			
35	16-Oct-17	7	7	7			
36	13-Mar-18	3.3	3.3	3.3			
37	19-Apr-18	4.5	4.5	4.5			
38	9-Aug-18	3.7	3.7	3.7			
39	22-Oct-18	3.4	3.4	3.4			
40	8-Mar-19	2	2	2			
Coefficient of Variation:		0.44	0.45	0.50			
Mann-Kendall Statistic (S):		20	107	-22			
Confidence Factor:		58.7%	92.5%	99.8%			
Concentration Trend:		No Trend	Prob. Increasing	Decreasing			



**Notes:**

- At least four independent sampling events per well are required for calculating the trend. Methodology is valid for 4 to 40 samples.
- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing (S>0) or decreasing (S<0): >95% = Increasing or Decreasing; ≥ 90% = Probably Increasing or Probably Decreasing; < 90% and S=0 = No Trend; < 90%, S=0, and COV ≥ 1 = No Trend; < 90% and COV < 1 = Stable.
- Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, Ground Water, 41(3):355-367, 2003.

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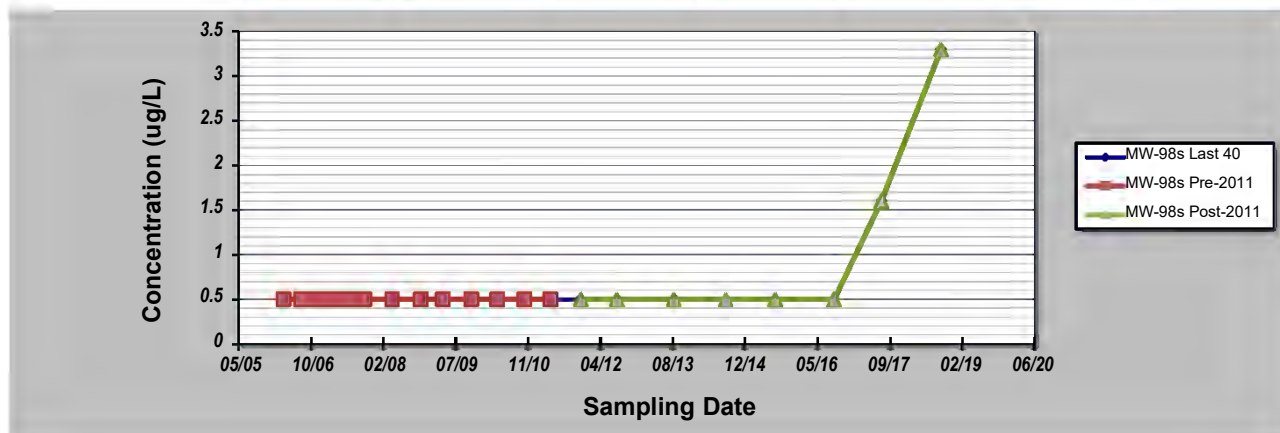
## GSI MANN-KENDALL TOOLKIT for Constituent Trend Analysis

Evaluation Date: <b>22-Mar-19</b>	Job ID: <b>806500</b>
Facility Name: <b>Gelman</b>	Constituent: <b>1,4-Dioxane</b>
Conducted By: <b>Fleis &amp; VandenBrink</b>	Concentration Units: <b>ug/L</b>

Sampling Point ID:	MW-98s Last 40	MW-98s Pre-2011	MW-98s Post-2011		
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Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)					
1	3-Apr-06	0.5	0.5				
2	2-Aug-06	0.5	0.5				
3	27-Oct-06	0.5	0.5				
4	15-Jan-07	0.5	0.5				
5	19-Apr-07	0.5	0.5				
6	17-Jul-07	0.5	0.5				
7	12-Oct-07	0.5	0.5				
8	22-Apr-08	0.5	0.5				
9	6-Nov-08	0.5	0.5				
10	9-Apr-09	0.5	0.5				
11	21-Oct-09	0.5	0.5				
12	19-Apr-10	0.5	0.5				
13	22-Oct-10	0.5	0.5				
14	20-Apr-11	0.5	0.5				
15	17-Nov-11	0.5		0.5			
16	24-Jul-12	0.5		0.5			
17	21-Aug-13	0.5		0.5			
18	14-Aug-14	0.5		0.5			
19	20-Jul-15	0.5		0.5			
20	1-Sep-16	0.5		0.5			
21	24-Jul-17	1.6		1.6			
22	10-Sep-18	3.3		3.3			
23							
24							
25							

Coefficient of Variation:	0.93	0.00	1.02		
Mann-Kendall Statistic (S):	41	0	13		
Confidence Factor:	86.9%	47.8%	92.9%		
Concentration Trend:	No Trend	Stable	Prob. Increasing		

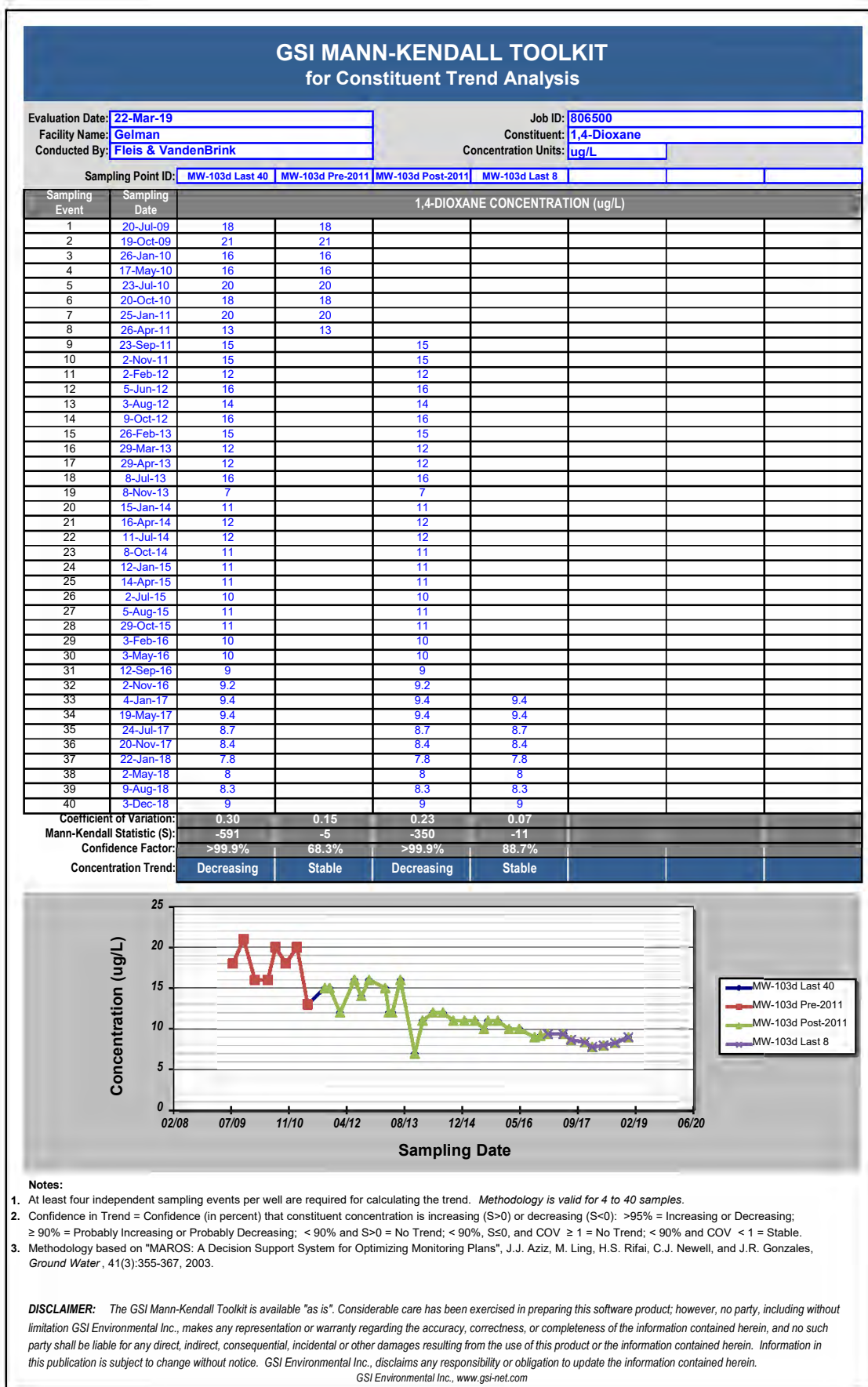


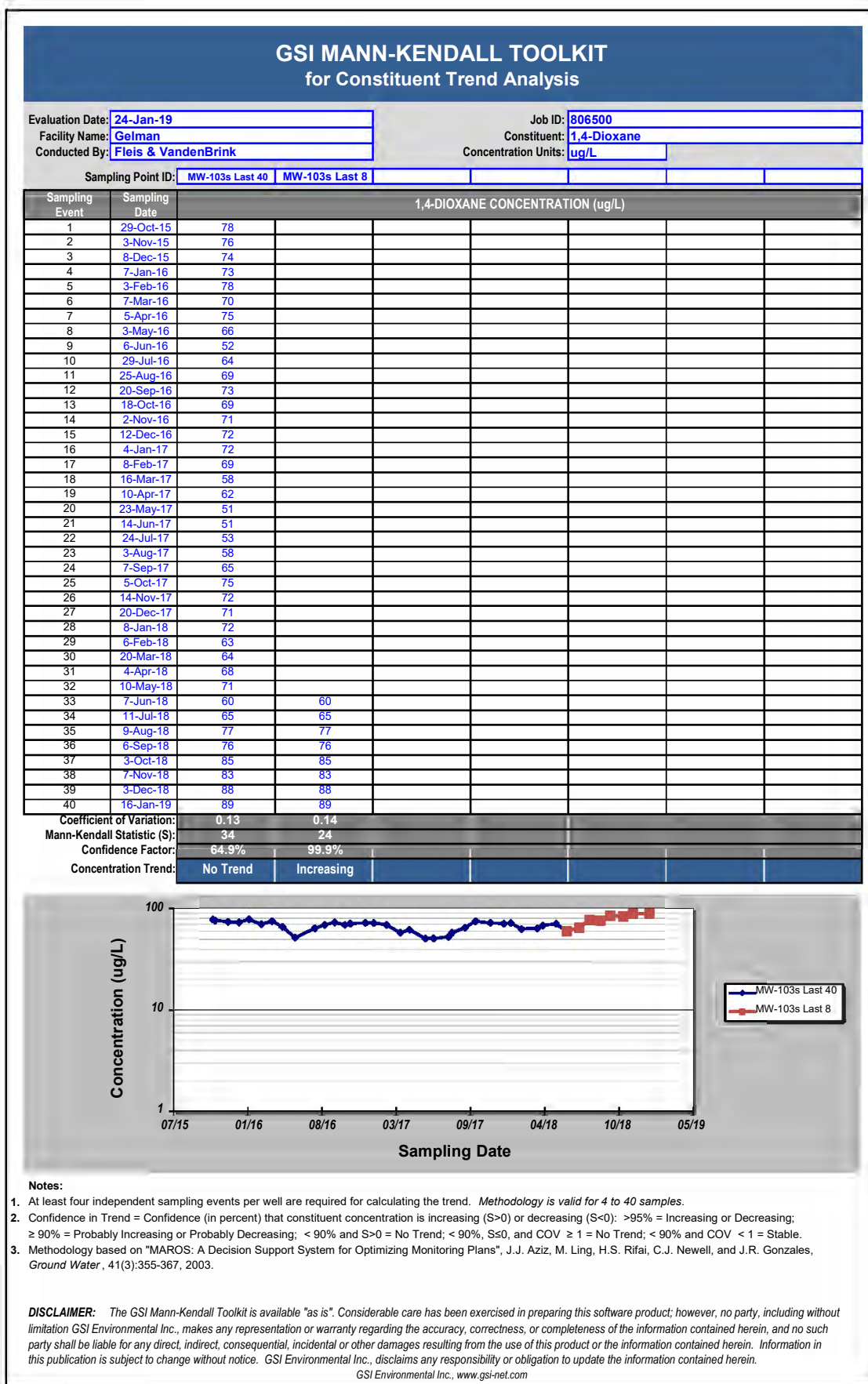
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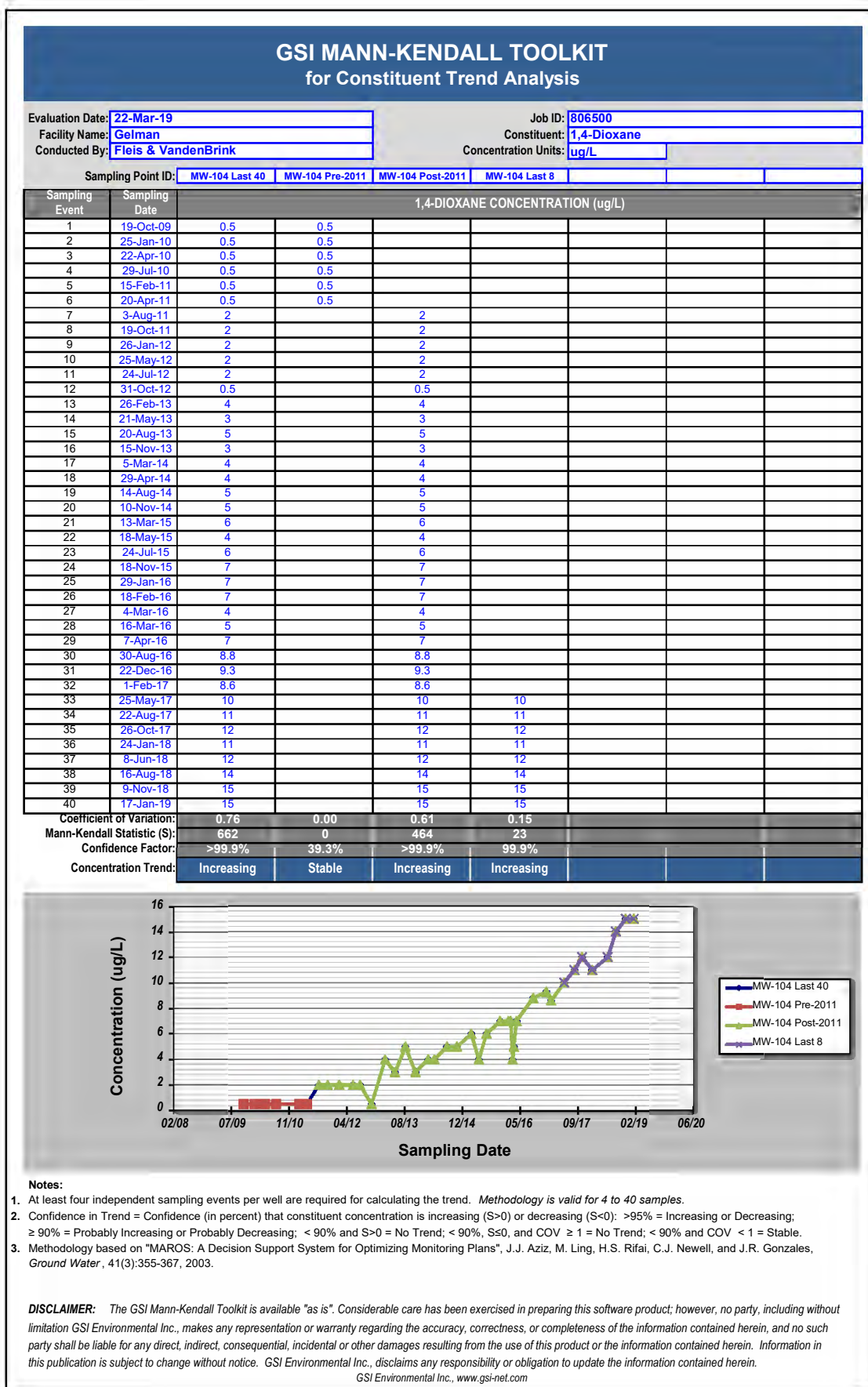
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- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing ( $S > 0$ ) or decreasing ( $S < 0$ ):  $> 95\%$  = Increasing or Decreasing;  $\geq 90\%$  = Probably Increasing or Probably Decreasing;  $< 90\%$  and  $S > 0$  = No Trend;  $< 90\%$ ,  $S \leq 0$ , and  $COV \geq 1$  = No Trend;  $< 90\%$  and  $COV < 1$  = Stable.
- Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

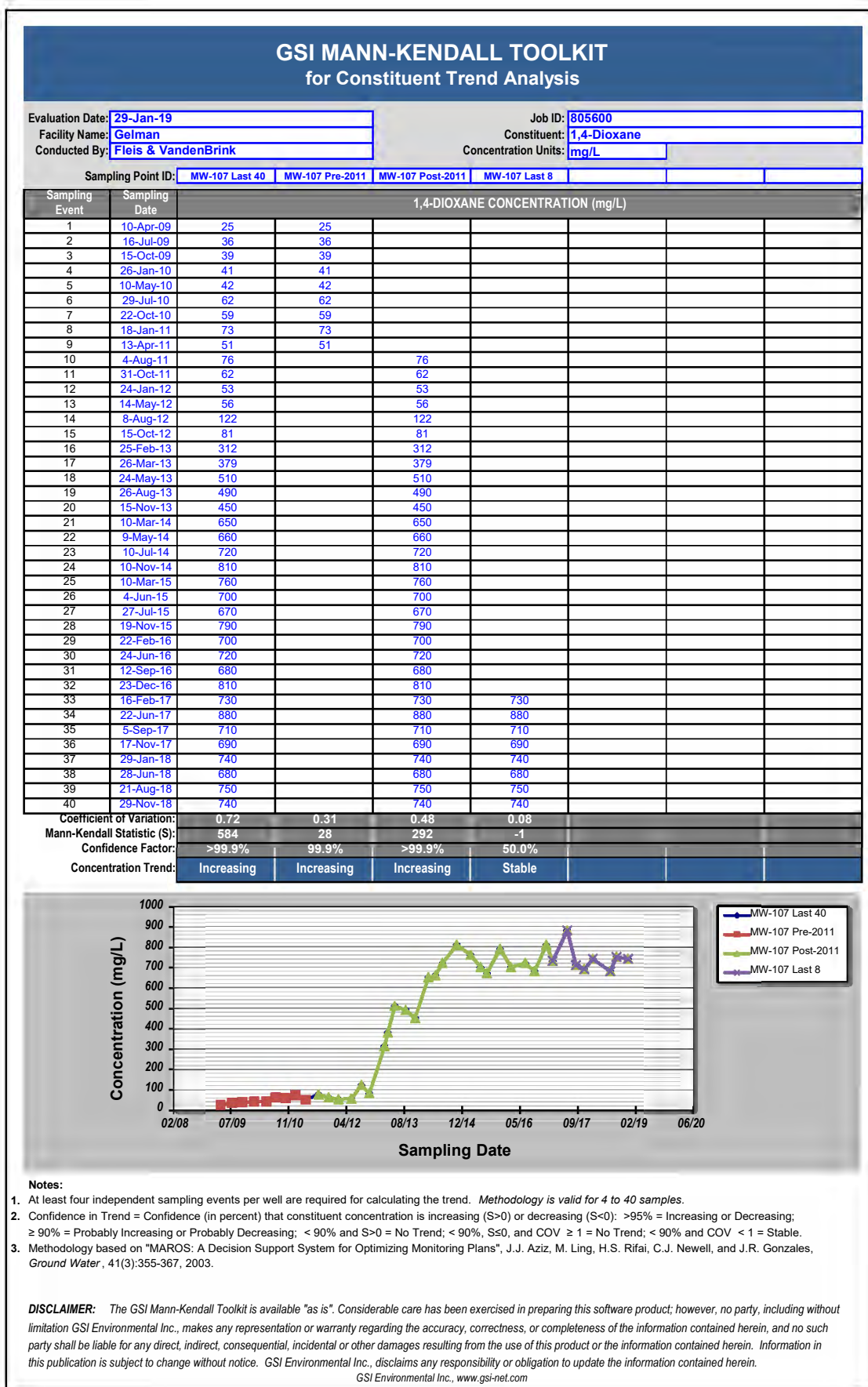
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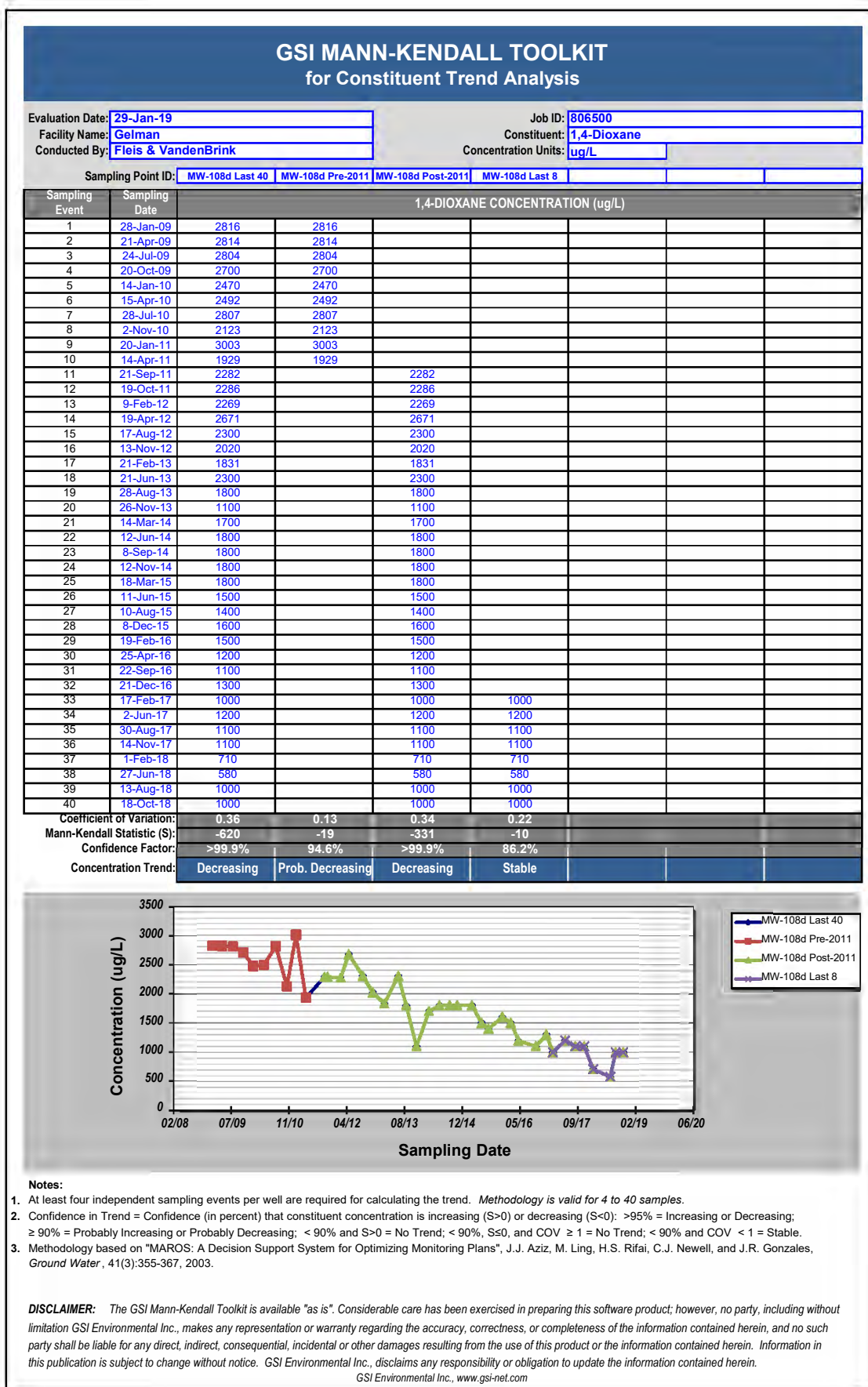
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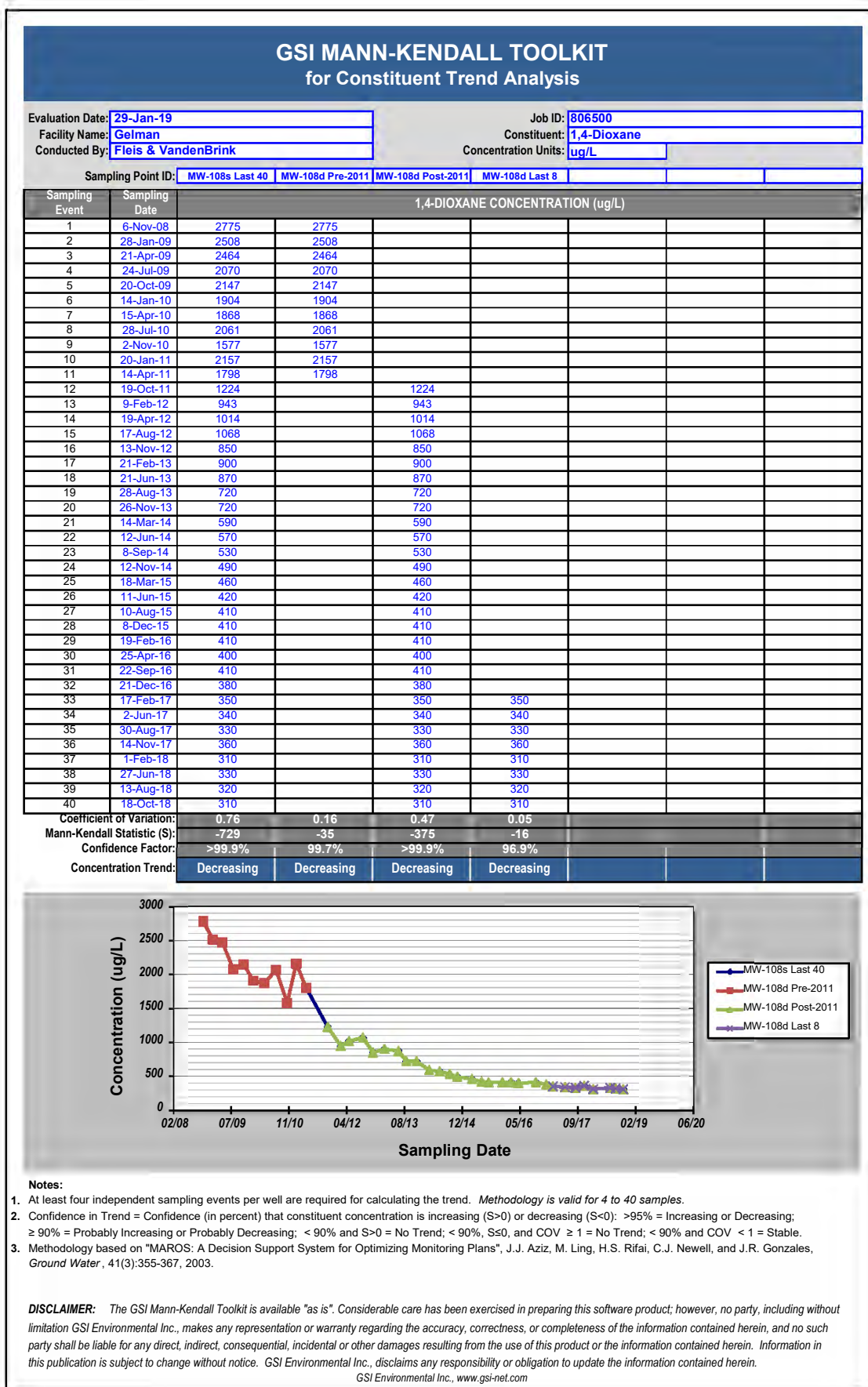


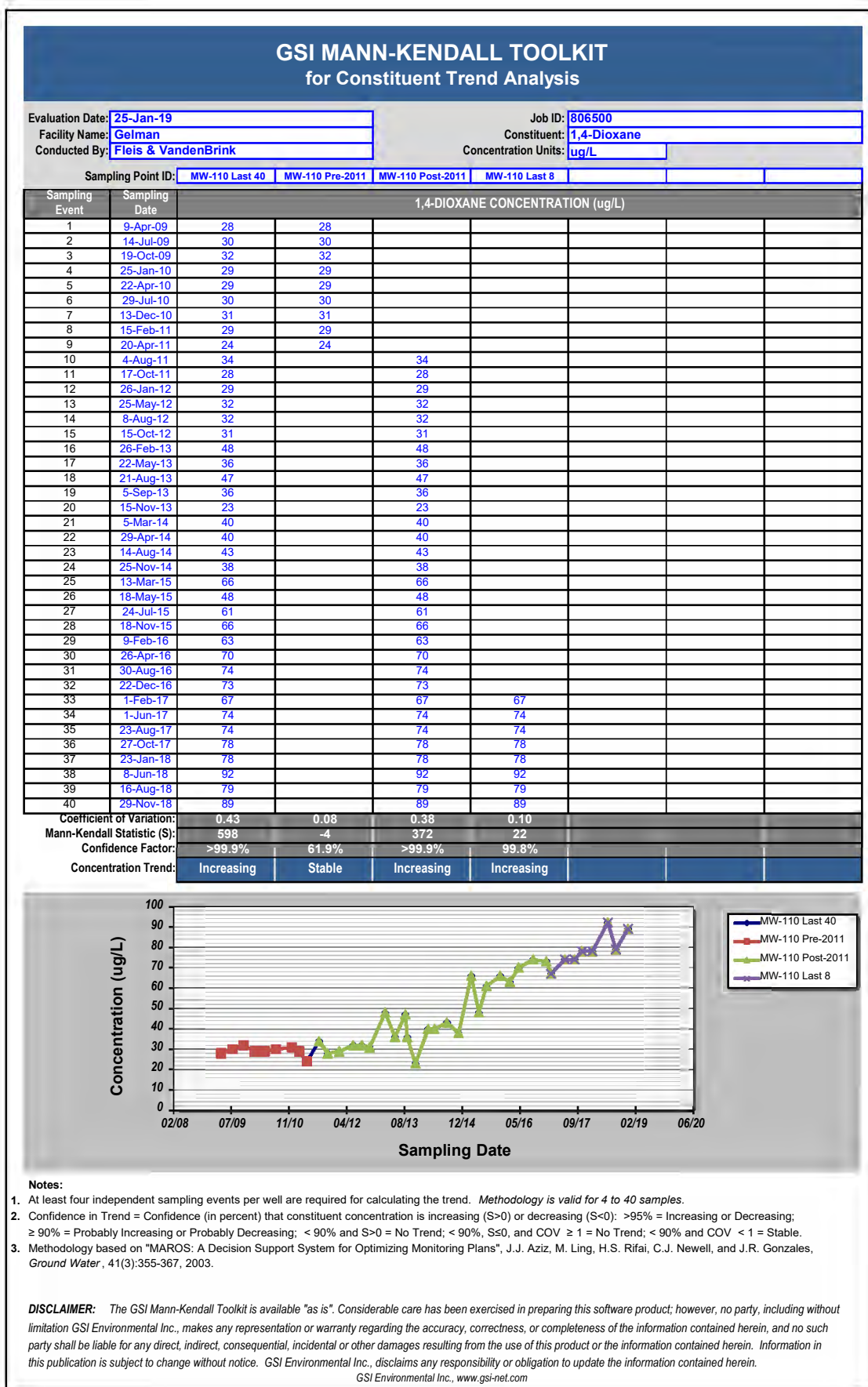


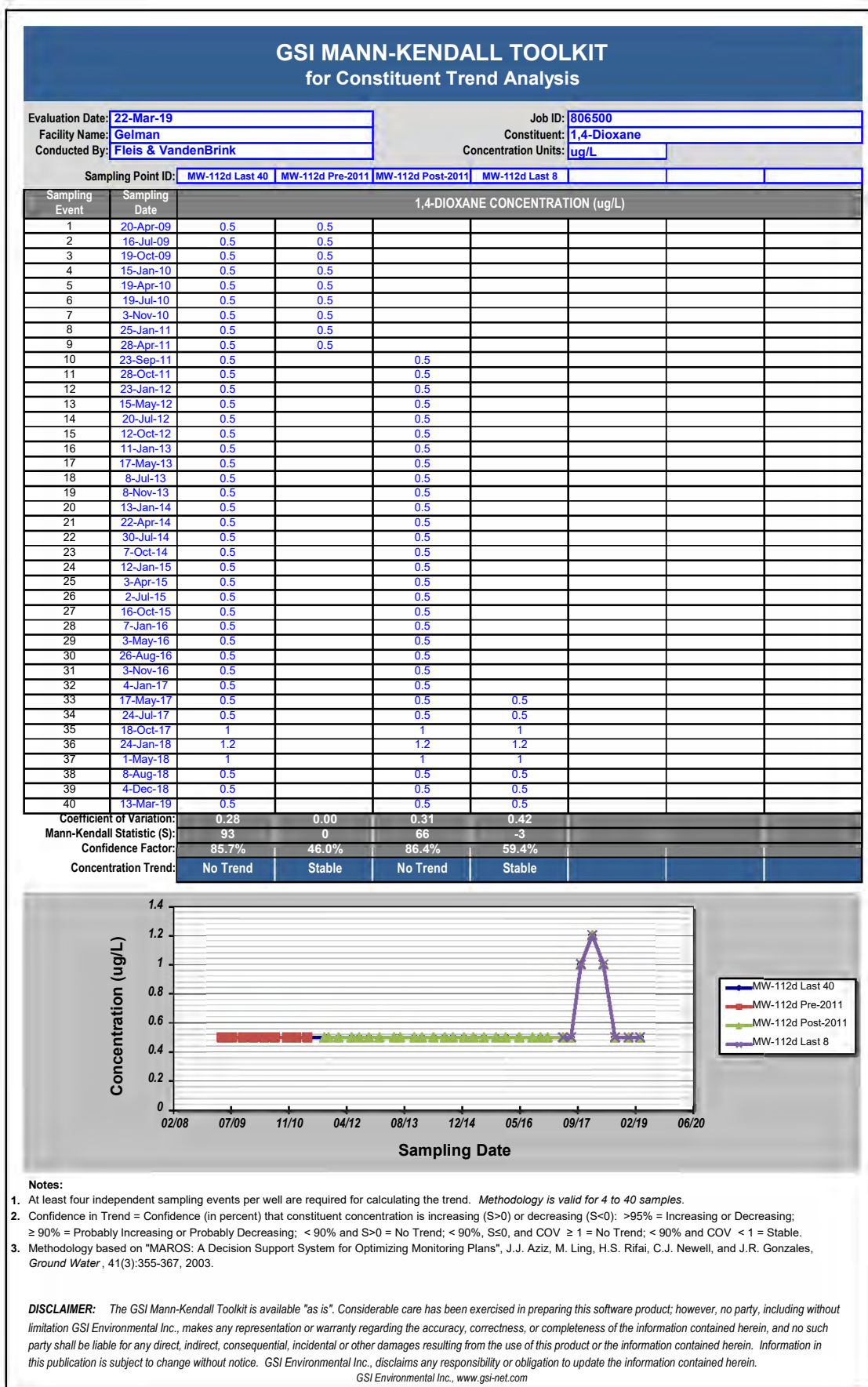


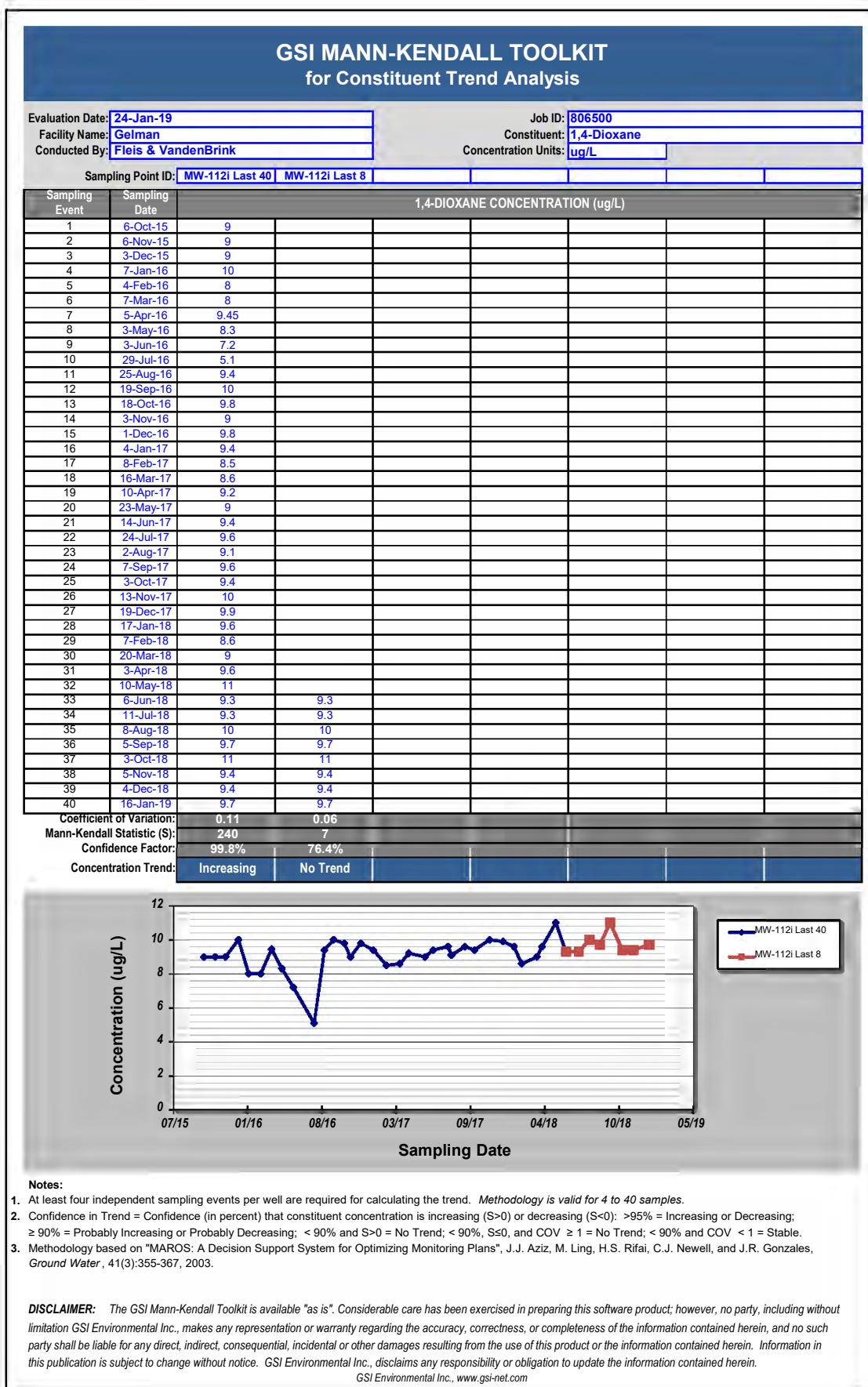


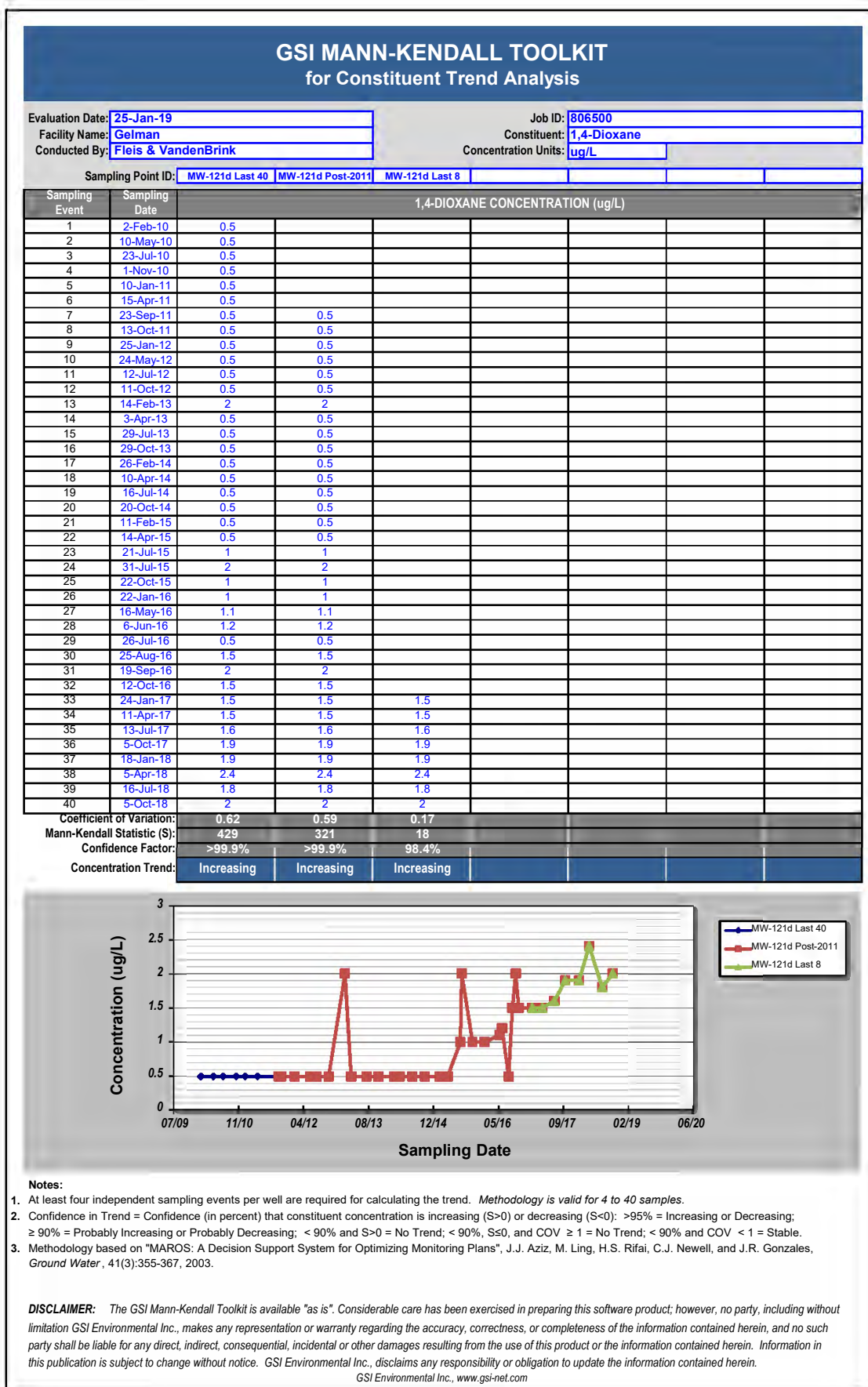


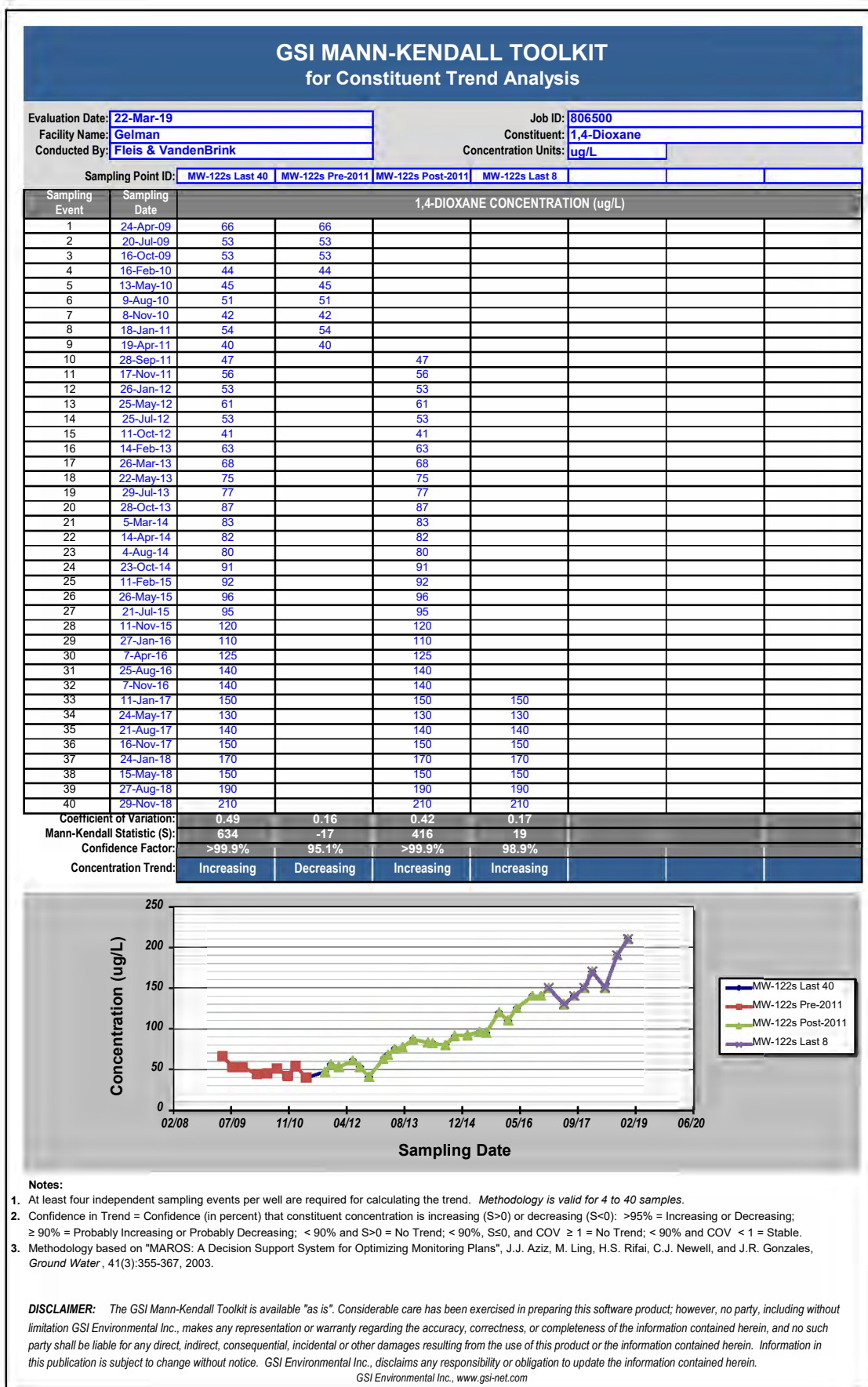


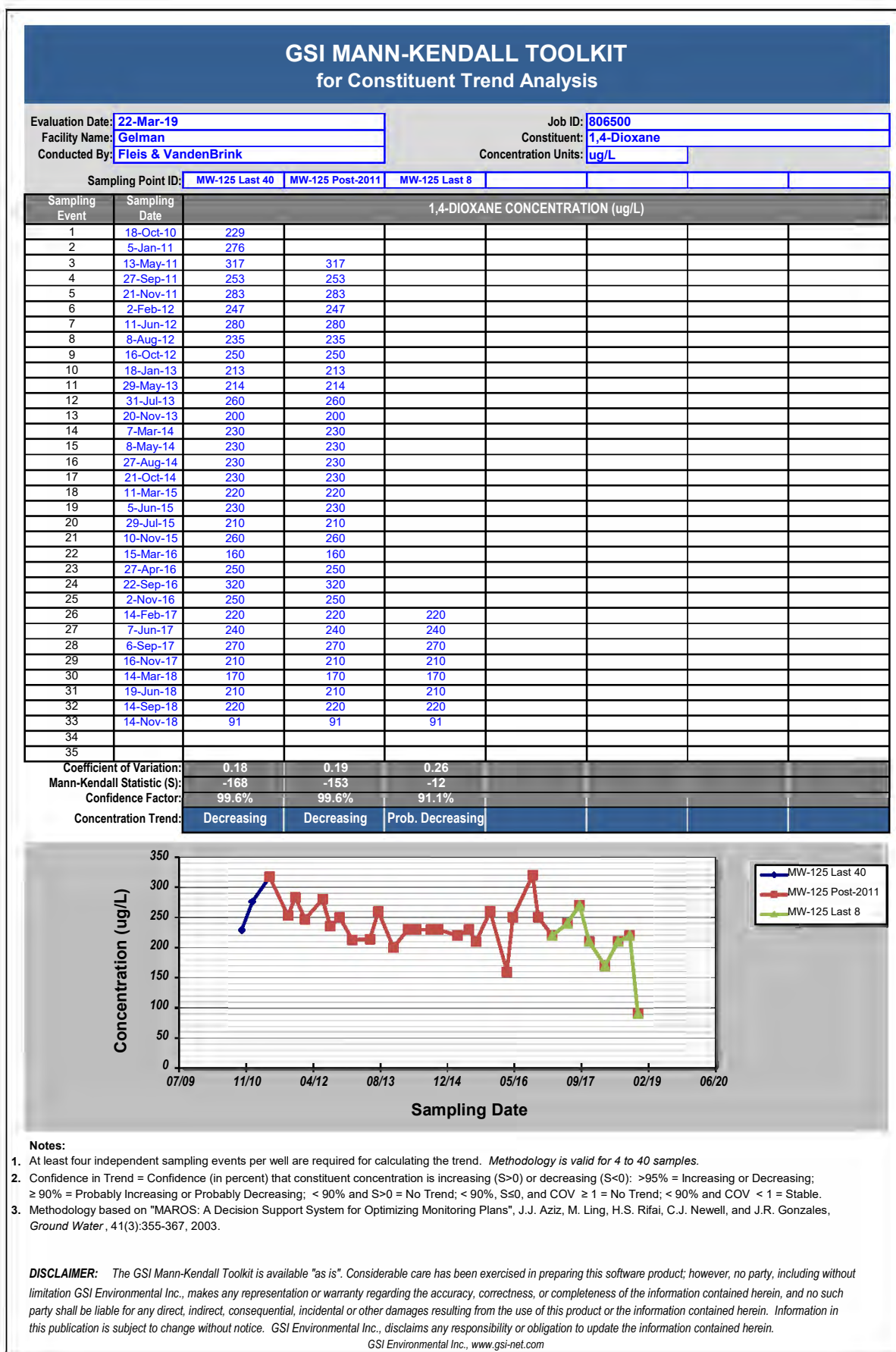


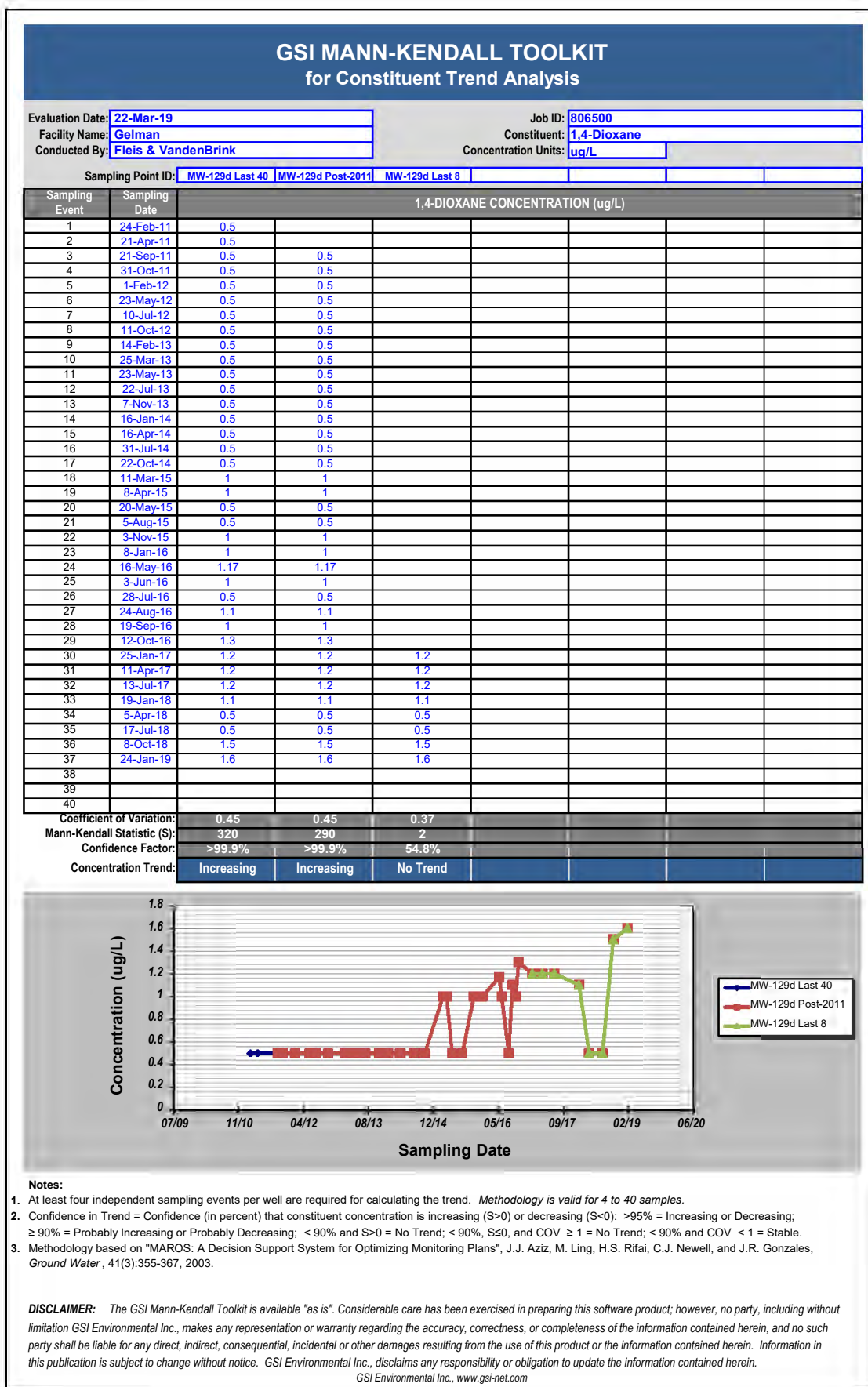












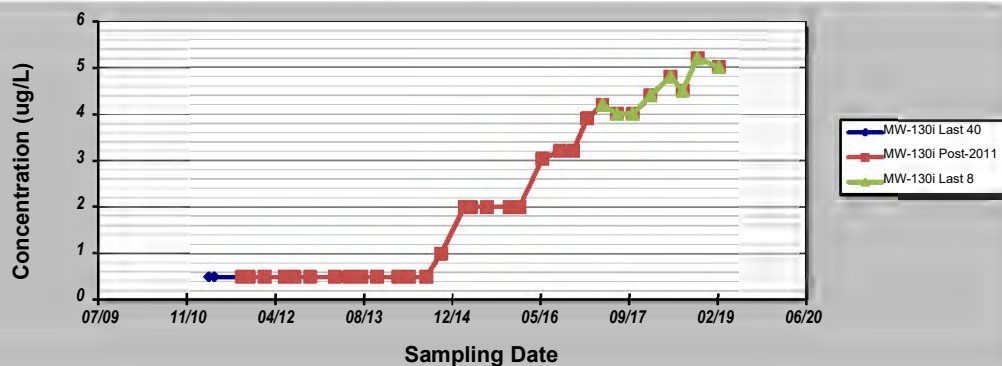
## GSI MANN-KENDALL TOOLKIT for Constituent Trend Analysis

Evaluation Date: **22-Mar-19** Job ID: **806500**  
Facility Name: **Gelman** Constituent: **1,4-Dioxane**  
Conducted By: **Fleis & VandenBrink** Concentration Units: **ug/L**

Sampling Point ID: **MW-130i Last 40** **MW-130i Post-2011** **MW-130i Last 8**

Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)						
1	21-Mar-11	0.5						
2	21-Apr-11	0.5						
3	25-Sep-11	0.5	0.5					
4	1-Nov-11	0.5	0.5					
5	31-Jan-12	0.5	0.5					
6	24-May-12	0.5	0.5					
7	16-Jul-12	0.5	0.5					
8	12-Oct-12	0.5	0.5					
9	1-Mar-13	0.5	0.5					
10	23-May-13	0.5	0.5					
11	29-Jul-13	0.5	0.5					
12	28-Oct-13	0.5	0.5					
13	25-Feb-14	0.5	0.5					
14	23-Apr-14	0.5	0.5					
15	31-Jul-14	0.5	0.5					
16	22-Oct-14	1	1					
17	5-Mar-15	2	2					
18	8-Apr-15	2	2					
19	7-Jul-15	2	2					
20	11-Nov-15	2	2					
21	8-Jan-16	2	2					
22	17-May-16	3.03	3.03					
23	24-Aug-16	3.2	3.2					
24	7-Nov-16	3.2	3.2					
25	25-Jan-17	3.9	3.9					
26	21-Apr-17	4.2	4.2	4.2				
27	13-Jul-17	4	4	4				
28	9-Oct-17	4	4	4				
29	19-Jan-18	4.4	4.4	4.4				
30	10-May-18	4.8	4.8	4.8				
31	17-Jul-18	4.5	4.5	4.5				
32	8-Oct-18	5.2	5.2	5.2				
33	7-Feb-19	5	5	5				
34								
35								

Coefficient of Variation: 0.83 0.80 0.10  
Mann-Kendall Statistic (S): 403 367 19  
Confidence Factor: >99.9% >99.9% 98.9%  
Concentration Trend: Increasing Increasing Increasing



### Notes:

- At least four independent sampling events per well are required for calculating the trend. *Methodology is valid for 4 to 40 samples.*
- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing (S>0) or decreasing (S<0): >95% = Increasing or Decreasing; ≥ 90% = Probably Increasing or Probably Decreasing; < 90% and S>0 = No Trend; < 90%, S≤0, and COV ≥ 1 = No Trend; < 90% and COV < 1 = Stable.
- Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

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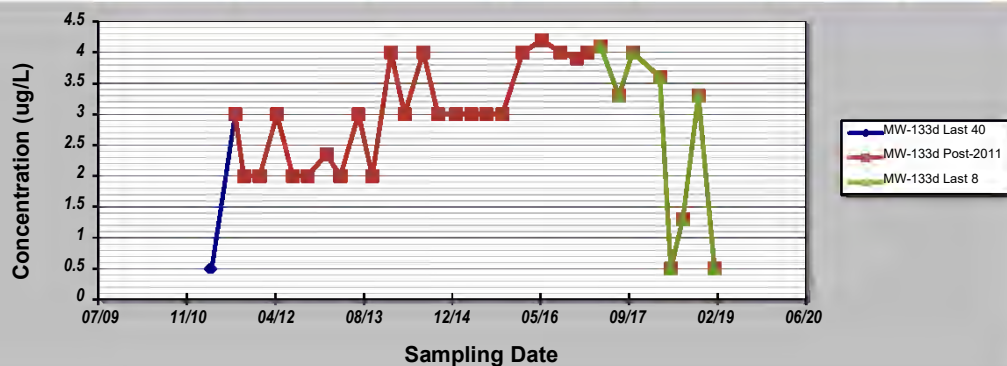
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## GSI MANN-KENDALL TOOLKIT for Constituent Trend Analysis

Evaluation Date: **22-Mar-19** Job ID: **806500**  
Facility Name: **Gelman** Constituent: **1,4-Dioxane**  
Conducted By: **Fleis & VandenBrink** Concentration Units: **ug/L**

Sampling Point ID: **MW-133d Last 40** **MW-133d Post-2011** **MW-133d Last 8**

Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)						
1	23-Mar-11	0.5						
2	8-Apr-11	0.5						
3	18-Aug-11	3	3					
4	6-Oct-11	2	2					
5	3-Jan-12	2	2					
6	10-Apr-12	3	3					
7	9-Jul-12	2	2					
8	2-Oct-12	2	2					
9	15-Jan-13	2.35	2.35					
10	4-Apr-13	2	2					
11	15-Jul-13	3	3					
12	1-Oct-13	2	2					
13	15-Jan-14	4	4					
14	2-Apr-14	3	3					
15	16-Jul-14	4	4					
16	7-Oct-14	3	3					
17	16-Jan-15	3	3					
18	13-Apr-15	3	3					
19	8-Jul-15	3	3					
20	7-Oct-15	3	3					
21	29-Jan-16	4	4					
22	17-May-16	4.2	4.2					
23	29-Aug-16	4	4					
24	1-Dec-16	3.9	3.9					
25	31-Jan-17	4	4					
26	13-Apr-17	4.1	4.1	4.1				
27	26-Jul-17	3.3	3.3	3.3				
28	12-Oct-17	4	4	4				
29	16-Mar-18	3.6	3.6	3.6				
30	16-May-18	0.5	0.5	0.5				
31	23-Jul-18	1.3	1.3	1.3				
32	19-Oct-18	3.3	3.3	3.3				
33	18-Jan-19	0.5	0.5	0.5				
34								
35								
Coefficient of Variation:		0.42	0.35	0.60				
Mann-Kendall Statistic (S):		163	105	-16				
Confidence Factor:		99.5%	96.2%	96.9%				
Concentration Trend:		Increasing	Increasing	Decreasing				



### Notes:

- At least four independent sampling events per well are required for calculating the trend. *Methodology is valid for 4 to 40 samples.*
- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing (S>0) or decreasing (S<0): >95% = Increasing or Decreasing; ≥ 90% = Probably Increasing or Probably Decreasing; < 90% and S>0 = No Trend; < 90%, S≤0, and COV ≥ 1 = No Trend; < 90% and COV < 1 = Stable.
- Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

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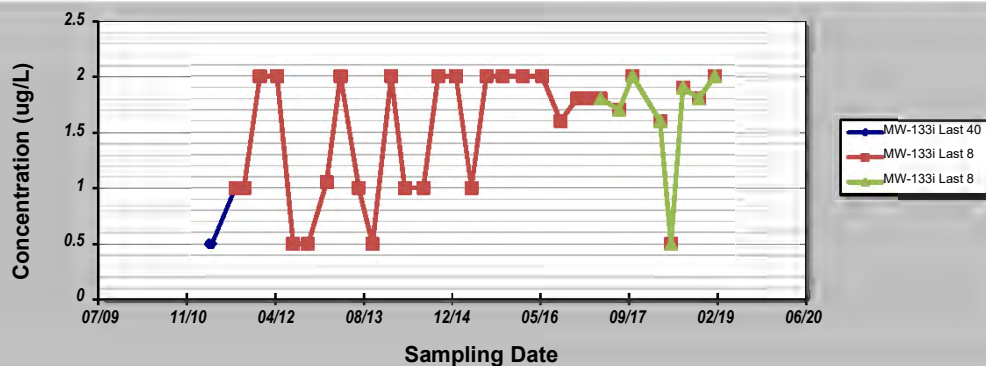
## GSI MANN-KENDALL TOOLKIT for Constituent Trend Analysis

Evaluation Date: **22-Mar-19** Job ID: **806500**  
Facility Name: **Gelman** Constituent: **1,4-Dioxane**  
Conducted By: **Fleis & VandenBrink** Concentration Units: **ug/L**

Sampling Point ID: **MW-133i Last 40** **MW-133i Last 8** **MW-133i Last 8**

Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)							
1	22-Mar-11	0.5							
2	8-Apr-11	0.5							
3	18-Aug-11	1	1						
4	6-Oct-11	1	1						
5	3-Jan-12	2	2						
6	10-Apr-12	2	2						
7	9-Jul-12	0.5	0.5						
8	2-Oct-12	0.5	0.5						
9	15-Jan-13	1.05	1.05						
10	4-Apr-13	2	2						
11	15-Jul-13	1	1						
12	1-Oct-13	0.5	0.5						
13	15-Jan-14	2	2						
14	2-Apr-14	1	1						
15	16-Jul-14	1	1						
16	7-Oct-14	2	2						
17	16-Jan-15	2	2						
18	13-Apr-15	1	1						
19	8-Jul-15	2	2						
20	7-Oct-15	2	2						
21	29-Jan-16	2	2						
22	17-May-16	2	2						
23	29-Aug-16	1.6	1.6						
24	1-Dec-16	1.8	1.8						
25	31-Jan-17	1.8	1.8						
26	13-Apr-17	1.8	1.8	1.8					
27	26-Jul-17	1.7	1.7	1.7					
28	10-Oct-17	2	2	2					
29	16-Mar-18	1.6	1.6	1.6					
30	16-May-18	0.5	0.5	0.5					
31	23-Jul-18	1.9	1.9	1.9					
32	19-Oct-18	1.8	1.8	1.8					
33	18-Jan-19	2	2	2					
34									
35									

Coefficient of Variation:	0.41	0.37	0.29
Mann-Kendall Statistic (S):	119	65	4
Confidence Factor:	96.7%	86.0%	64.0%
Concentration Trend:	Increasing	No Trend	No Trend



### Notes:

- At least four independent sampling events per well are required for calculating the trend. *Methodology is valid for 4 to 40 samples.*
- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing (S>0) or decreasing (S<0): >95% = Increasing or Decreasing; ≥ 90% = Probably Increasing or Probably Decreasing; < 90% and S>0 = No Trend; < 90%, S≤0, and COV ≥ 1 = No Trend; < 90% and COV < 1 = Stable.
- Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

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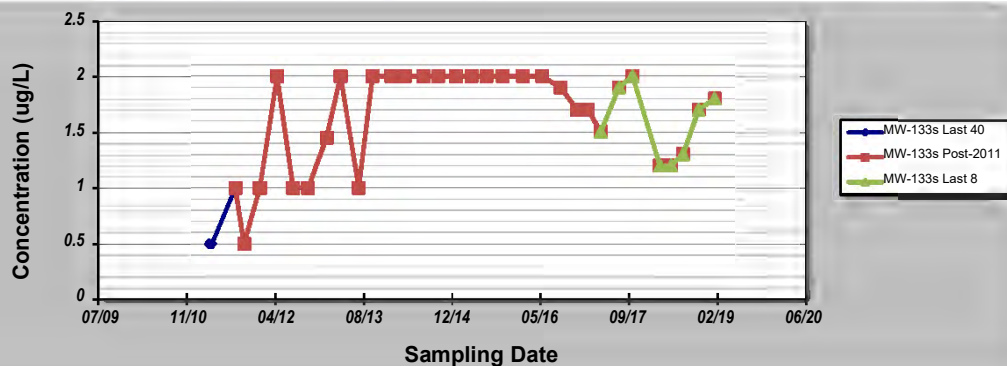
## GSI MANN-KENDALL TOOLKIT for Constituent Trend Analysis

Evaluation Date: **22-Mar-19** Job ID: **806500**  
Facility Name: **Gelman** Constituent: **1,4-Dioxane**  
Conducted By: **Fleis & VandenBrink** Concentration Units: **ug/L**

Sampling Point ID: **MW-133s Last 40** **MW-133s Post-2011** **MW-133s Last 8**

Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)						
1	22-Mar-11	0.5						
2	8-Apr-11	0.5						
3	18-Aug-11	1	1					
4	6-Oct-11	0.5	0.5					
5	3-Jan-12	1	1					
6	10-Apr-12	2	2					
7	9-Jul-12	1	1					
8	2-Oct-12	1	1					
9	15-Jan-13	1.45	1.45					
10	4-Apr-13	2	2					
11	15-Jul-13	1	1					
12	1-Oct-13	2	2					
13	15-Jan-14	2	2					
14	2-Apr-14	2	2					
15	16-Jul-14	2	2					
16	7-Oct-14	2	2					
17	16-Jan-15	2	2					
18	13-Apr-15	2	2					
19	8-Jul-15	2	2					
20	7-Oct-15	2	2					
21	29-Jan-16	2	2					
22	17-May-16	2	2					
23	29-Aug-16	1.9	1.9					
24	1-Dec-16	1.7	1.7					
25	31-Jan-17	1.7	1.7					
26	13-Apr-17	1.5	1.5	1.5				
27	26-Jul-17	1.9	1.9	1.9				
28	10-Oct-17	2	2	2				
29	14-Mar-18	1.2	1.2	1.2				
30	16-May-18	1.2	1.2	1.2				
31	23-Jul-18	1.3	1.3	1.3				
32	19-Oct-18	1.7	1.7	1.7				
33	18-Jan-19	1.8	1.8	1.8				
34								
35								

Coefficient of Variation:	0.32	0.27	0.20
Mann-Kendall Statistic (S):	81	21	1
Confidence Factor:	89.2%	63.2%	50.0%
Concentration Trend:	No Trend	No Trend	No Trend

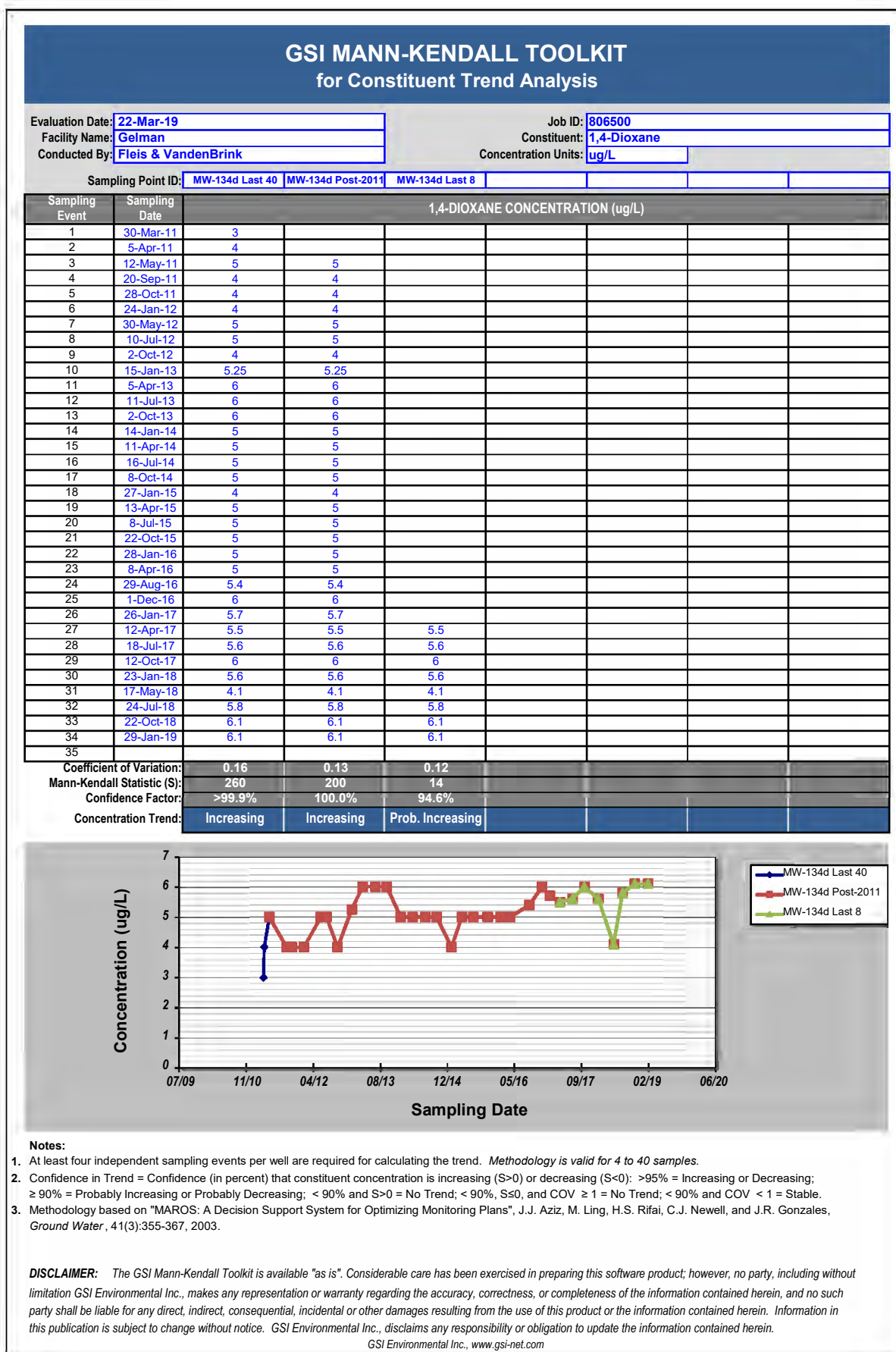


### Notes:

- At least four independent sampling events per well are required for calculating the trend. *Methodology is valid for 4 to 40 samples.*
- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing (S>0) or decreasing (S<0): >95% = Increasing or Decreasing; ≥ 90% = Probably Increasing or Probably Decreasing; < 90% and S>0 = No Trend; < 90%, S≤0, and COV ≥ 1 = No Trend; < 90% and COV < 1 = Stable.
- Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

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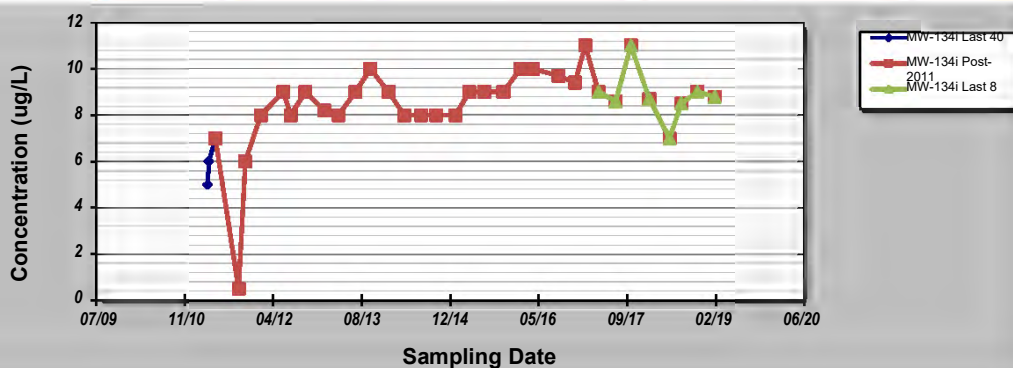
## GSI MANN-KENDALL TOOLKIT for Constituent Trend Analysis

Evaluation Date: **22-Mar-19** Job ID: **806500**  
Facility Name: **Gelman** Constituent: **1,4-Dioxane**  
Conducted By: **Fleis & VandenBrink** Concentration Units: **ug/L**

Sampling Point ID: **MW-134i Last 40** **MW-134i Post-2011** **MW-134i Last 8**

Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)							
1	30-Mar-11	5							
2	5-Apr-11	6							
3	12-May-11	7	7						
4	20-Sep-11	0.5	0.5						
5	28-Oct-11	6	6						
6	24-Jan-12	8	8						
7	30-May-12	9	9						
8	10-Jul-12	8	8						
9	2-Oct-12	9	9						
10	15-Jan-13	8.2	8.2						
11	5-Apr-13	8	8						
12	11-Jul-13	9	9						
13	2-Oct-13	10	10						
14	14-Jan-14	9	9						
15	11-Apr-14	8	8						
16	16-Jul-14	8	8						
17	8-Oct-14	8	8						
18	27-Jan-15	8	8						
19	13-Apr-15	9	9						
20	8-Jul-15	9	9						
21	22-Oct-15	9	9						
22	28-Jan-16	10	10						
23	8-Apr-16	10	10						
24	29-Aug-16	9.7	9.7						
25	1-Dec-16	9.4	9.4						
26	26-Jan-17	11	11						
27	12-Apr-17	9	9	9					
28	18-Jul-17	8.6	8.6	8.6					
29	12-Oct-17	11	11	11					
30	23-Jan-18	8.7	8.7	8.7					
31	17-May-18	7	7	7					
32	24-Jul-18	8.5	8.5	8.5					
33	22-Oct-18	9	9	9					
34	29-Jan-19	8.8	8.8	8.8					
35									

Coefficient of Variation: 0.23 0.21 0.12  
Mann-Kendall Statistic (S): 208 148 -3  
Confidence Factor: 99.9% 99.2% 59.4%  
Concentration Trend: Increasing Increasing Stable

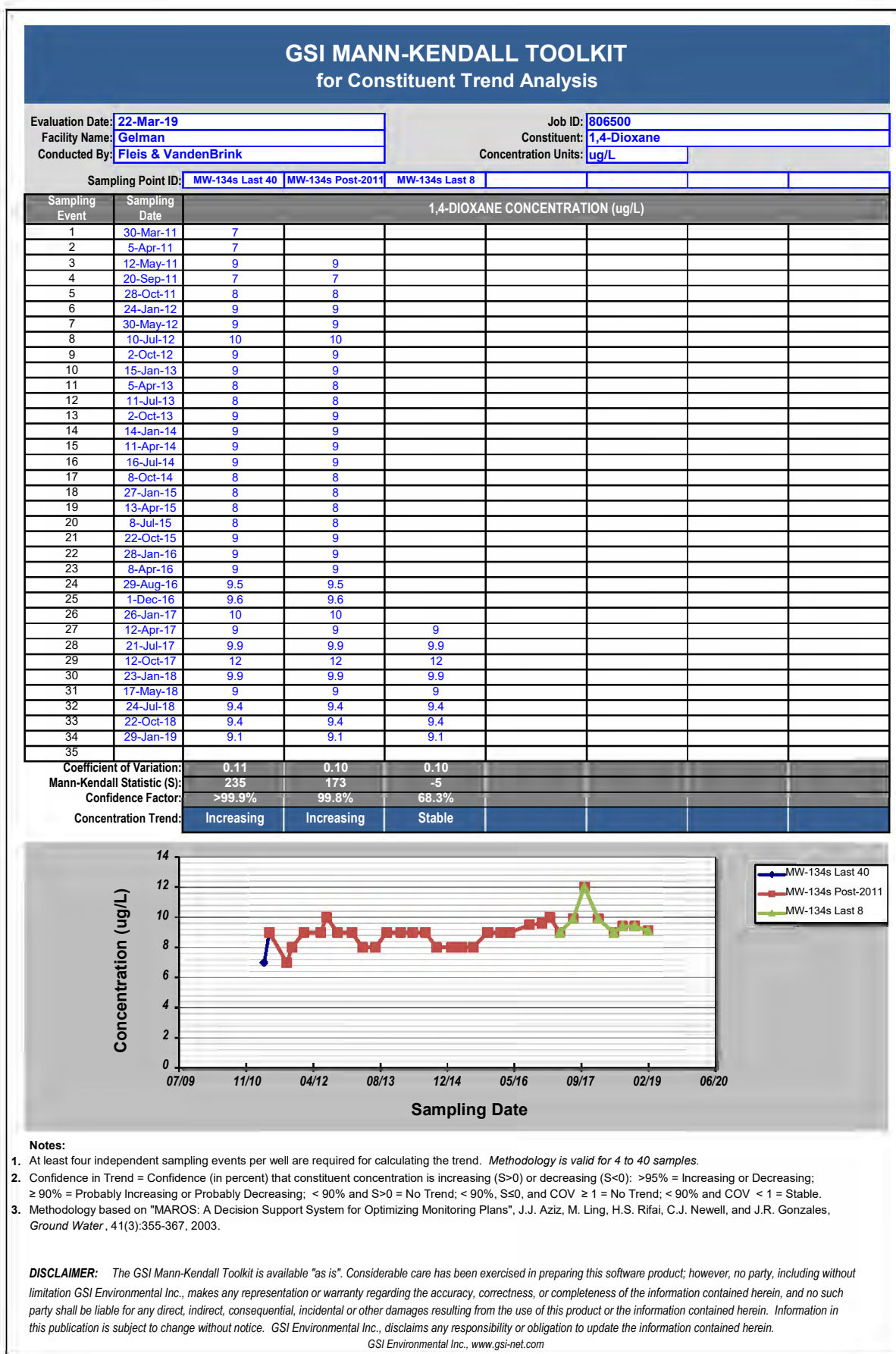


### Notes:

- At least four independent sampling events per well are required for calculating the trend. Methodology is valid for 4 to 40 samples.
- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing (S>0) or decreasing (S<0): >95% = Increasing or Decreasing; ≥ 90% = Probably Increasing or Probably Decreasing; < 90% and S>0 = No Trend; < 90%, S≤0, and COV ≥ 1 = No Trend; < 90% and COV < 1 = Stable.
- Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

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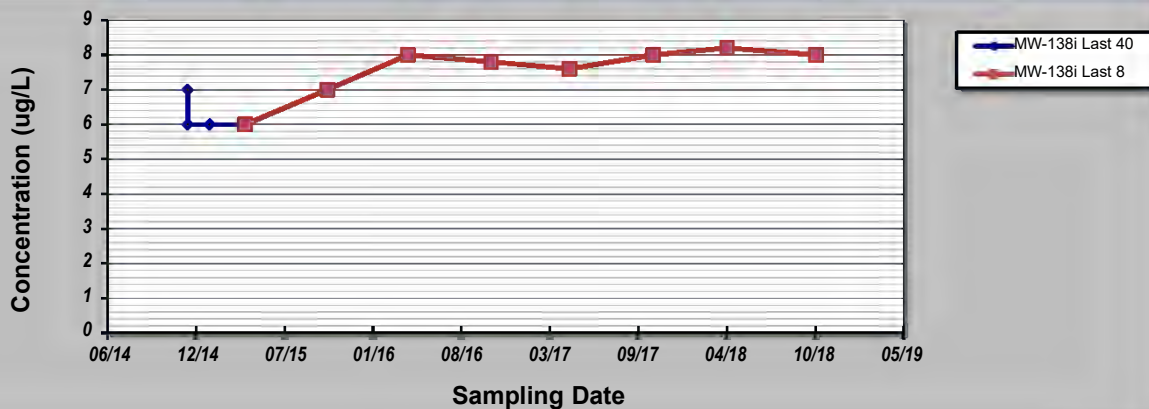
## GSI MANN-KENDALL TOOLKIT for Constituent Trend Analysis

Evaluation Date: **22-Mar-19**  
Facility Name: **Gelman**  
Conducted By: **Fleis & VandenBrink**

Job ID: **806500**  
Constituent: **1,4-Dioxane**  
Concentration Units: **ug/L**

Sampling Point ID: **MW-138i Last 40** **MW-138i Last 8**

Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)							
1	8-Dec-14	7							
2	8-Dec-14	6							
3	26-Jan-15	6							
4	17-Apr-15	6	6						
5	20-Oct-15	7	7						
6	19-Apr-16	8	8						
7	24-Oct-16	7.8	7.8						
8	19-Apr-17	7.6	7.6						
9	25-Oct-17	8	8						
10	10-Apr-18	8.2	8.2						
11	29-Oct-18	8	8						
12									
13									
14									
15									
16									
17									
18									
19									
20									
Coefficient of Variation:		0.12	0.10						
Mann-Kendall Statistic (S):		34	17						
Confidence Factor:		99.6%	97.7%						
Concentration Trend:		Increasing	Increasing						



### Notes:

- At least four independent sampling events per well are required for calculating the trend. *Methodology is valid for 4 to 40 samples.*
- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing ( $S > 0$ ) or decreasing ( $S < 0$ ):  $> 95\%$  = Increasing or Decreasing;  $\geq 90\%$  = Probably Increasing or Probably Decreasing;  $< 90\%$  and  $S > 0$  = No Trend;  $< 90\%$ ,  $S \leq 0$ , and  $COV \geq 1$  = No Trend;  $< 90\%$  and  $COV < 1$  = Stable.
- Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

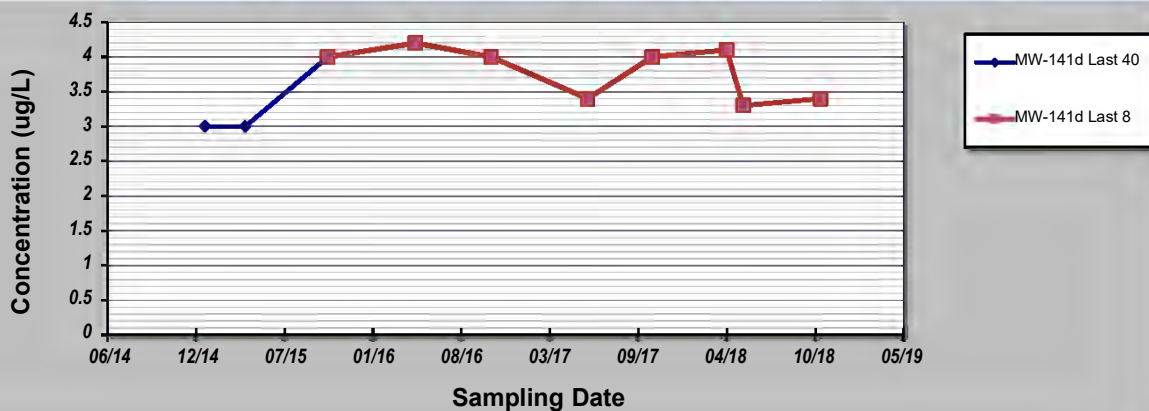
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## GSI MANN-KENDALL TOOLKIT for Constituent Trend Analysis

Evaluation Date: <b>22-Mar-19</b>	Job ID: <b>806500</b>
Facility Name: <b>Gelman</b>	Constituent: <b>1,4-Dioxane</b>
Conducted By: <b>Fleis &amp; VandenBrink</b>	Concentration Units: <b>ug/L</b>
Sampling Point ID: <b>MW-141d Last 40</b> <b>MW-141d Last 8</b>	

Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)					
1	16-Jan-15	3					
2	17-Apr-15	3					
3	21-Oct-15	4	4				
4	6-May-16	4.2	4.2				
5	24-Oct-16	4	4				
6	30-May-17	3.4	3.4				
7	23-Oct-17	4	4				
8	9-Apr-18	4.1	4.1				
9	17-May-18	3.3	3.3				
10	8-Nov-18	3.4	3.4				
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
Coefficient of Variation:		0.13	0.10				
Mann-Kendall Statistic (S):		6	-10				
Confidence Factor:		66.8%	86.2%				
Concentration Trend:		No Trend	Stable				



**Notes:**

- At least four independent sampling events per well are required for calculating the trend. *Methodology is valid for 4 to 40 samples.*
- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing (S>0) or decreasing (S<0): >95% = Increasing or Decreasing; ≥ 90% = Probably Increasing or Probably Decreasing; < 90% and S>0 = No Trend; < 90%, S≤0, and COV ≥ 1 = No Trend; < 90% and COV < 1 = Stable.
- Methodology based on "MAROS: A Decision Support System for Optimizing Monitoring Plans", J.J. Aziz, M. Ling, H.S. Rifai, C.J. Newell, and J.R. Gonzales, *Ground Water*, 41(3):355-367, 2003.

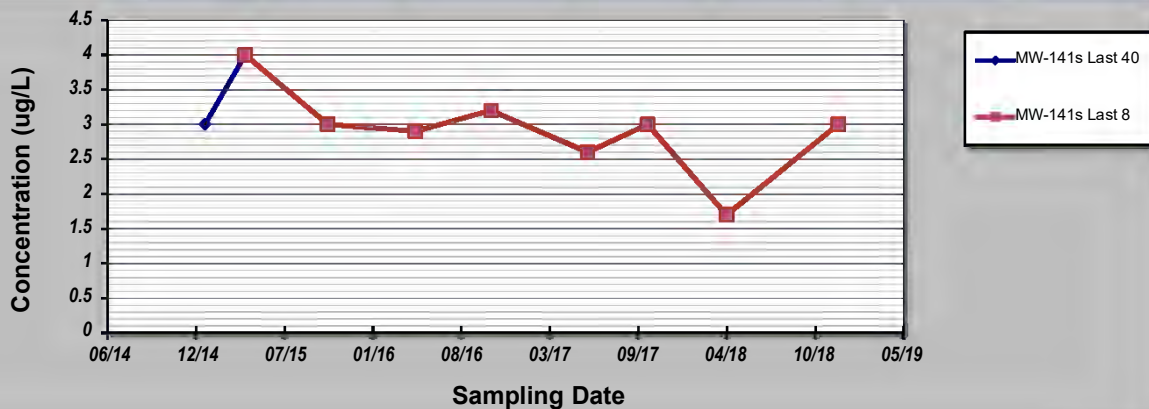
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Evaluation Date: <b>22-Mar-19</b>	Job ID: <b>806500</b>
Facility Name: <b>Gelman</b>	Constituent: <b>1,4-Dioxane</b>
Conducted By: <b>Fleis &amp; VandenBrink</b>	Concentration Units: <b>ug/L</b>
Sampling Point ID: <b>MW-141s Last 40</b> <b>MW-141s Last 8</b>	

Sampling Event	Sampling Date	1,4-DIOXANE CONCENTRATION (ug/L)					
1	16-Jan-15	3					
2	17-Apr-15	4	4				
3	21-Oct-15	3	3				
4	6-May-16	2.9	2.9				
5	24-Oct-16	3.2	3.2				
6	30-May-17	2.6	2.6				
7	13-Oct-17	3	3				
8	9-Apr-18	1.7	1.7				
9	18-Dec-18	3	3				
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
Coefficient of Variation:		0.20	0.22				
Mann-Kendall Statistic (S):		-12	-11				
Confidence Factor:		87.0%	88.7%				
Concentration Trend:		Stable	Stable				



**Notes:**

- At least four independent sampling events per well are required for calculating the trend. *Methodology is valid for 4 to 40 samples.*
- Confidence in Trend = Confidence (in percent) that constituent concentration is increasing (S>0) or decreasing (S<0): >95% = Increasing or Decreasing; ≥ 90% = Probably Increasing or Probably Decreasing; < 90% and S>0 = No Trend; < 90%, S≤0, and COV ≥ 1 = No Trend; < 90% and COV < 1 = Stable.
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