APPENDIX 5
Suggested Notice of Intent (NOI) Form

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 1

Request for General Permit Authorization to Discharge Noncontact Cooling Water to be covered by the Noncontact Cooling Water General Permit (NCCWGP) NPDES General Permits No. MAG250000 and NHG250000

A. Facility Information

1. Indicate applicable General Permit:

MAG250000 ☑
NHG250000 ☐

2. Facility Information/Location:

Facility Name Hazen Paper Company
Street/PO Box 295 Park Street
City Housatonic
State Massachusetts
Zip Code 01236-05
Latitude 42 14 26
Longitude 073 21 26

Type of Business Manufacturing- Paper Converting
SIC Code(s) 2672, 2671

3. Facility Mailing address (if different from Location Address):

Facility Name Hazen Paper Company
Street/PO Box PO Box 189
City Holyoke
State Massachusetts
Zip Code 01040

4. Facility Owner:

Name John H Hazen
E-mail jhh@hazen.com
Street/PO Box PO Box 189
City Holyoke
State Massachusetts
Zip Code 01040

Contact Person Gail M Calvanese
Tel 413-538-8204 X335
Owner is (check one): Federal ____ State ____ Tribal ____ Private X
Other (describe) ____

5. Facility Operator (if different from above):

Legal Name ____
E-mail ____
Street/PO Box ____
City ____ Zip Code ____
State ____ Contact ____
Telephone ____

6. Current permit coverage: yes☐ no■

a) Has a prior NPDES permit (individual or general permit coverage) been granted for the discharge that is listed on the NOI? yes■ no☐ If Yes, permit number MAG250973

b) Is the facility covered by an individual NPDES permit for other discharges? yes☐ no☐
If yes, Permit Number: _____

c) Is there a pending NPDES application on file with EPA for this discharge? yes☐ no■
If yes, date of submittal: _____ and permit number, if available _____

7. Attach a topographic map indicating the location of the facility and the outfall(s) to the receiving water.

B. Map attached? ■ **Discharge Information** (attach additional sheets as needed):

1. Name of receiving water into which discharge will occur: Housatonic River
Freshwater ☐ Marine Water ☐; State Water Quality Classification Class B, Warm Water Fishery
Type of Receiving Water Body (e.g., stream, river, lake, reservoir, estuary, etc.) River

2. Attach a line drawing or flow schematic showing water flow through the facility including sources of intake water, operations contributing to flow, treatment units, outfalls, and receiving water(s).
Line drawing or flow diagram attached? ■

3. Describe the discharge activities for which the owner/applicant is seeking coverage (e.g., building cooling, process line cooling, etc.) Process Non-Contact Cooling Water

4. Number of Outfalls 1 Latitude and Longitude to the nearest second for each Outfall. See EPA's siting tool at https://www.epa.gov/toxics-release-inventory-tri-program/tri-data-and-tools. Attach additional pages if necessary.

Outfall # Latitude 42 14 24 Longitude 73 21 28
Outfall # Latitude _____ Longitude _____
Outfall # Latitude _____ Longitude _____

5. For each Outfall provide the following discharge information:

Outfall # 1

a) Maximum Daily Flow 1.27 MGD Average Monthly Flow .3 MGD
NOTE: EPA will use the flow reported here as the facility's permitted effluent flow limit.
b) Maximum Daily Temperature 83 °F Average Monthly Temperature 57 °F
c) Maximum Monthly pH 8.3 s.u. Minimum Monthly pH 6.5 s.u.
d) Outfall's discharge is: continuous ☐ intermittent ■ seasonal ☐

Outfall # _____

a) Maximum Daily Flow _____ MGD Average Monthly Flow _____ MGD
NOTE: EPA will use the flow reported here as the facility's permitted effluent flow limit.
b) Maximum Daily Temperature _____ °F Average Monthly Temperature _____ °F
c) Maximum Monthly pH _____ s.u. Minimum Monthly pH _____ s.u.
d) Outfall's discharge is: continuous ☐ intermittent ☐ seasonal ☐

Outfall # _____

a) Maximum Daily Flow _____MGD Average Monthly Flow _____MGD
NOTE: EPA will use the flow reported here as the facility's permitted effluent flow limit.
b) Maximum Daily Temperature _____°F Average Monthly Temperature _____°F
c) Maximum Monthly pH _____s.u. Minimum Monthly pH _____s.u.
d) Outfall's discharge is: continuous ☐ intermittent ☐ seasonal ☐

6. Is the source of the NCCW potable water? yes☐ no■
If yes, EPA will calculate a Total Residual Chlorine effluent limit for your facility.

7. Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water 44.6MGD
Attach any calculation sheets used to support stream flow and/or dilution calculations.

8. **For facilities that discharge to Massachusetts surface waters:**

a) Submit the completed engineering calculation of the surface water temperature rise as shown in Attachment B of the General Permit. Calculation attached? ■
b) Does the discharge occur in an Area of Critical Environmental Concern (ACEC)? yes☐ no☐
If yes, provide the name of ACEC _____
c) Does the discharge occur to an Outstanding Resource Water (ORW)? yes☐ no■
If yes, enclose antidegradation waiver approval provided by MassDEP.

Note: See Appendix 1 of the General Permit for more information on ACEC.

C. Chemical Additives

1. Are any non-toxic neutralization and/or dechlorination chemicals used in the discharge(s)? yes☐ no☐

2. If yes, attach a list of each chemical used and include the chemical name and manufacturer; maximum and average daily quantity used on a monthly basis, as well as the maximum and average daily expected concentrations (mg/L) in the discharge, and the vendor's reported aquatic toxicity (NOAEL and/or LC_{50} in percent for typically acceptable aquatic organism).

3. Was this list submitted with the facility's 2014 NCCWGP NOI? yes☐ no■

D. NCCW Source Water Information

1. State the source of the NCCW (e.g., municipal water supply, private well, surface water withdrawal, etc.).
Source Private Wells Name of Source Water North, South, Southwest

2. Is the source water registered/permitted under MA Water Management Act or NHDES User Registration Rule (ENV WQ 2202)? yes■ no☐ If yes, registration number 10211303 permit ~~#~~ 9P2-1-02-113.01

3. If the source water is groundwater (non-municipal well water), see Appendix 9 of the General Permit and submit effluent (and receiving water hardness) test results, as required in Part 5.4 of the General Permit.
Test results attached? ■

4. Does the facility use both a primary and backup source of NCCW? yes☐ no■ If yes, **attach information** that identifies and describes the primary and backup sources of NCCW and how often any backup supply was used in the past five years.

E. Best Technology Available for Cooling Water Intake Structures (CWISs)

If the facility's non-contact cooling water discharge is covered by this General Permit and the facility **withdraws water from a surface water**, it is subject to the BTA requirements at Part 4.2 of the General Permit.

1. Are you subject to the BTA requirements of the General Permit? yes☐ no■
   a) If no, explain_____and skip to F.
   b) If yes, submit a facility-specific BTA description that accurately describes the facility's operations and practices, including, but not limited to, the measures described in Part 5.5 of the General Permit. For additional information and guidance, see Section IV of the Fact Sheet.

Include in your description:

a) Measures to meet the General Permit Part 4.2.1 general BTA requirements, including documentation that describes the facility's monitoring program for impinged fish and/or invertebrates; or the required alternative monitoring plan frequency and/or protocol.
b) The attributes of the current CWIS.
c) The design measures of the CWIS.
d) The operational measures of the CWIS.
e) The historical occurrence of impinged fish for the past five years.
f) If applicable, a demonstration that the facility's intake rate is commensurate with a closed-cycle recirculation system.
g) Other components to reduce impingement and/or entrainment of aquatic life.

2. Provide the following information for each CWIS to support your attached facility-specific BTA description:
   a) The design capacity of the of the CWIS _____MGD
   b) Maximum monthly average intake of the CWIS during the previous five years _____MGD
   c) The month and year in which this flow reported in 2.b. occurred _____
   d) The maximum through-screen design intake velocity _____feet/second (fps)

3. For facilities where the CWIS is located on a freshwater river or stream, provide the following information:
   a) The source water's annual mean flow in MGD as available from USGS or other appropriate source _____MGD
   b) The design intake flow as a % of the source water's annual mean flow _____% Attach calculations if equal to or less than 5% of annual mean flow.
   c) The source water's 7Q10 _____MGD
   d) The design intake flow as a percent of the source water's 7Q10 _____%

4. Provide a map showing the location of each cooling water intake structure; NCCW Outfall(s) and CWIS features referred to in the BTA description. **Map attached?** ☐

F. Endangered Species Act Eligibility Information

If your facility is listed in Table A as one of the 37 facilities covered under the 2014 NCCW GP, check this box. ■
Your ESA consultation responsibilities have been satisfied by EPA. Proceed to Part G.

If your facility is not included as one of the 37 facilities covered under the 2014 NCCW GP, complete this Part.

Using the instructions in Appendix 2, Parts B(1) and B(2) of the NCCW GP, which of the following criteria apply to your facility?

United States Fish and Wildlife Service (USFWS) Criteria: A ☐ B ☐ C ☐

National Oceanic and Atmospheric Administration Fisheries Service (NOAA Fisheries) Criteria: A☐ B☐ C☐

1. If you selected USFWS criterion B, has consultation with the USFWS been completed? yes☐ no☐
   If you selected NOAA Fisheries criterion B, has consultation with NOAA Fisheries been completed?
   yes☐ no☐

2. If consultation with USFWS and/or NOAA Fisheries Service was completed, was a written concurrence finding that the discharge is "not likely to adversely affect" listed species or critical habitat received?
   USFWS yes☐ no☐ N/A☐ NOAA Fisheries yes☐ no☐ N/A☐

3. Attach documentation of ESA eligibility for USFWS and NOAA Fisheries as required at Appendix 2, Part C. of the General Permit. **Documentation attached?** USFWS☐ NOAA Fisheries ☐

4. Please indicate if your facility **directly intakes water for non-contact cooling from, or discharges any NCCW effluent to,** any of the following waterbodies:

   ☐ Merrimack River
   ☐ Connecticut River
   ☐ Westfield River
   ☐ Deerfield River
   ☐ Piscataqua River
   ☐ Salmon Falls River
   ☐ Cocheco River
   ☐ Taunton River

   EPA will consult with NOAA Fisheries on any cooling water intakes or discharges covered under this permit in areas (in the above waterbodies) that overlap with the presence of shortnose sturgeon (endangered) and Atlantic sturgeon (threatened/endangered).

   Please indicate if your facility **directly intakes water for non-contact cooling** from, **or discharges non-contact cooling water effluent to**, the Connecticut River Watershed. EPA will consult with the U.S Fish and Wildlife Service on cooling water intakes and discharges covered under this permit in areas of the Connecticut River Watershed that overlap with the presence of the dwarf wedgemussel (endangered).
   yes☐ no☐

G. National Historic Properties Act Eligibility

1. Are any historic properties listed or eligible for listing on the National Register of Historic Places located on the facility site or in proximity to the discharge? yes■ no☐

2. Have any State or Tribal Historic Preservation Officers been consulted in this determination? yes☐no■
   If yes, attach the results of the consultation(s).

3. Which of the three National Historic Preservation Act scenarios listed in Appendix 3, Section C has the facility met?
   ☐ 1 ▣ 2 ☐ 3

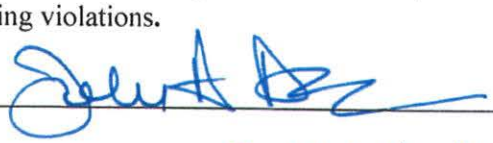
H. Supplemental Information

Please provide any supplemental information, including antidegradation review information applicable to new or increased discharges. Attach any analytical data used to support the application. Attach any certification(s) required by the General Permit.

I. Signature Requirements

The NOI must be signed by the operator in accordance with the signatory requirements of 40 CFR§ 122.22 (see below) including the following certification:

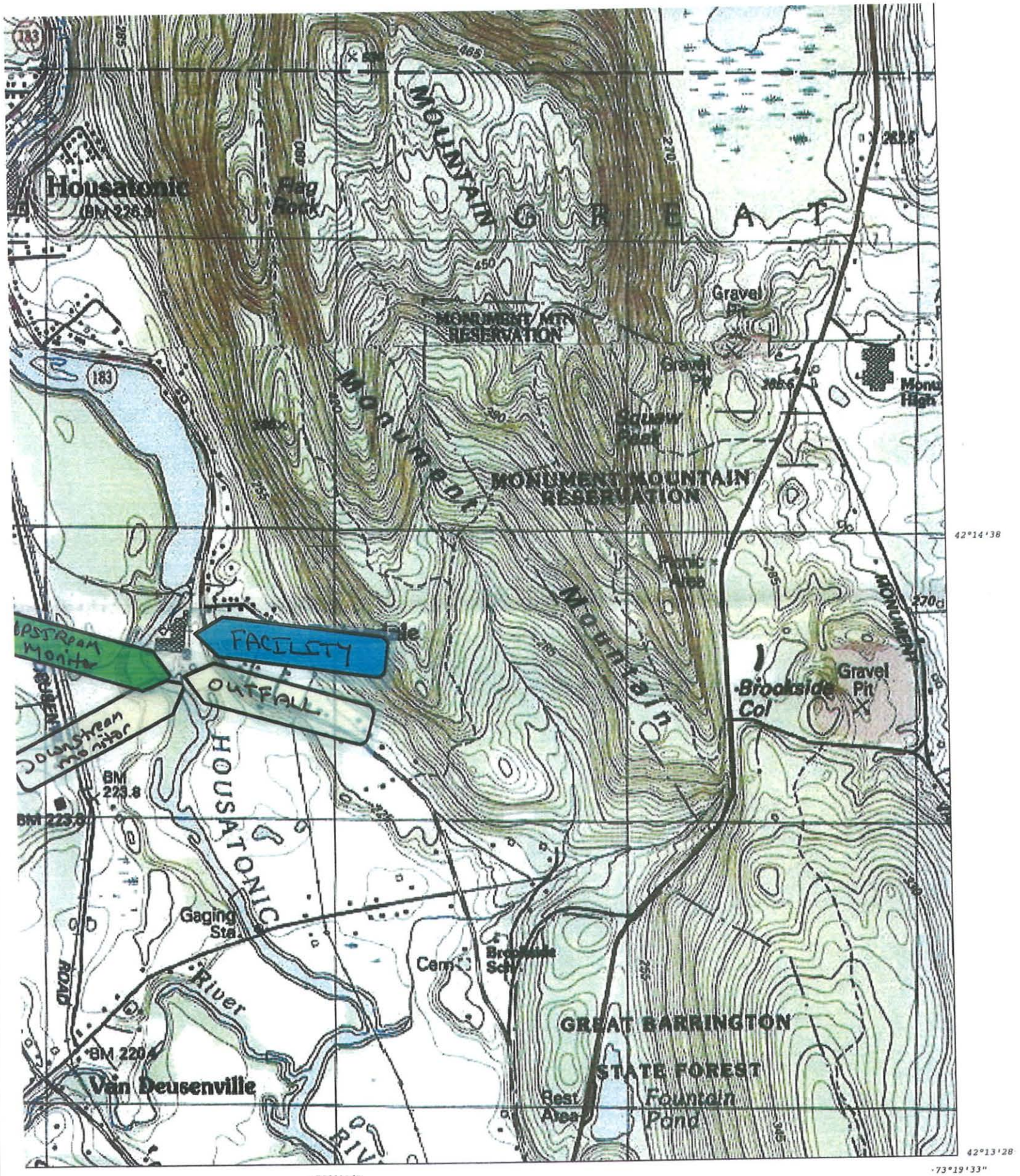
> I certify under penalty of law that (1) no biocides or other chemical additives except for those used for pH adjustment and/or dechlorination are used in the noncontact cooling water (NCCW) system; (2) the discharge consists solely of NCCW (to reduce temperature) and authorized pH adjustment and/or dechlorination chemicals; (3) the discharge does not come in contact with any raw materials, intermediate product, water product (other than heat) or finished product; (4) if the discharge of noncontact cooling water subsequently mixes with other wastewater (i.e. stormwater) prior to discharging to the receiving water, any monitoring provided under this permit will be only for noncontact cooling water; (5) where applicable, the facility has complied with the requirements of this permit specific to the Endangered Species Act and National Historic Preservation Act; and (6) this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.
>
> Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature  Date 10/7/2024

Printed Name and Title JOHN H HAGEN President

Federal regulations require this application to be signed as follows:

1. For a corporation, by a principal executive officer of at least the level of vice president;
2. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively, or,
3. For a municipality, State, Federal or other public facility, by either a principal executive officer or ranking elected official.



LEGEND

Light-duty.....
Heavy-duty.....
Trail.....
Unimproved dirt.....

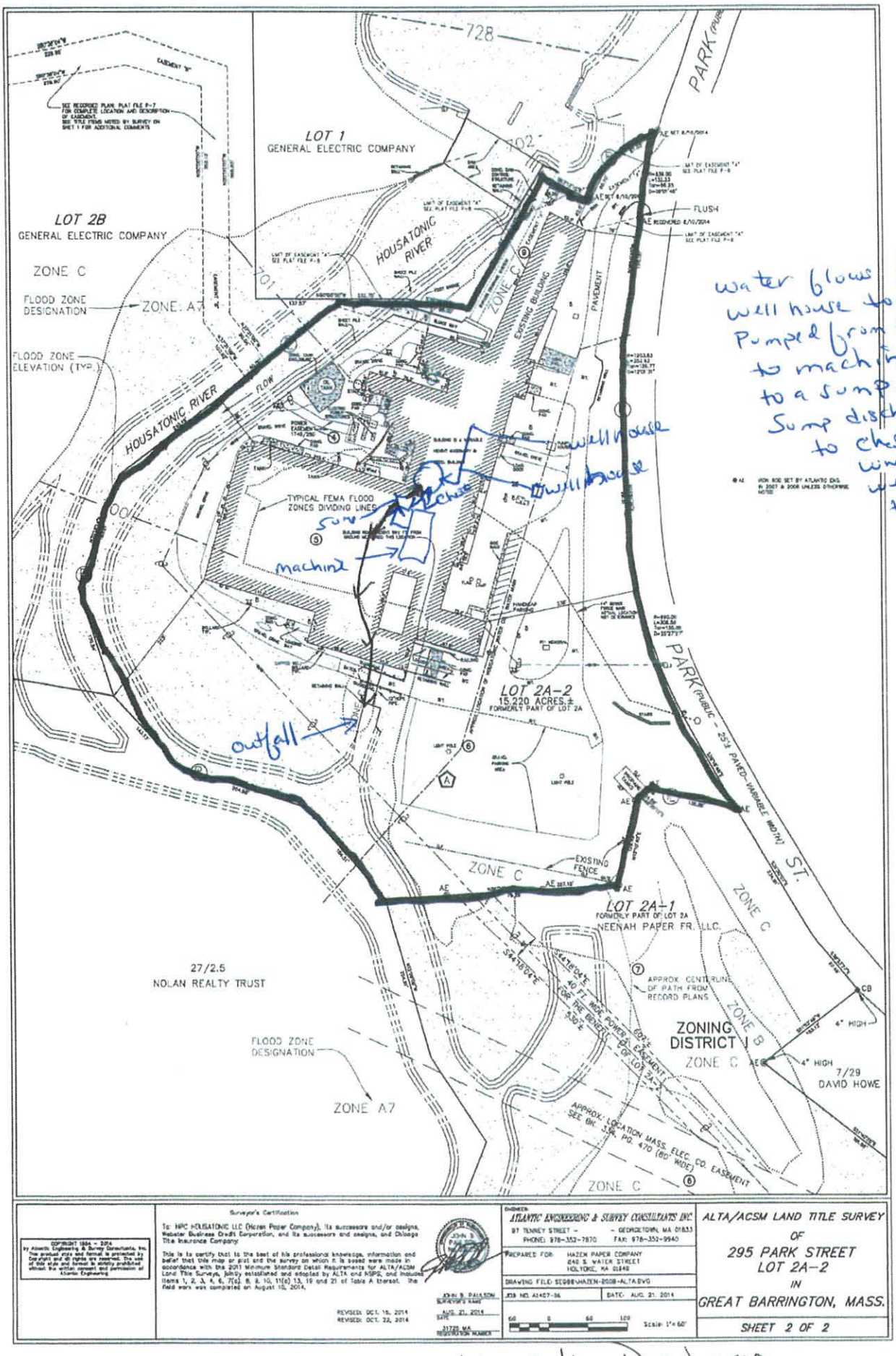
1 MILE

6K 8000 FEET

1 KILOMETER

Hurlbut Paper Company Housatonic Ma

EXHIBIT B



Surveyor's Certification

To: HPC HOUSATONIC LLC (Hazen Paper Company), its successors and/or assigns, Webster Business Credit Corporation, and its successors and assigns, and Chicago Title Insurance Company

This is to certify that to the best of his professional knowledge, information and belief that this map or plat and the survey on which it is based were made in accordance with the 2011 Minimum Standard Detail Requirements for ALTA/ACSM Land Title Surveys, jointly established and adopted by ALTA and NSPS, and includes items 1, 2, 3, 4, 6, 7(a), 8, 9, 10, 11(a) 13, 19 and 21 of Table A thereof. The field work was completed on August 15, 2014.

JOHN B. PAULSON
SURVEYOR'S NAME
AUG. 21, 2014
DATE
51728 MA
REGISTRATION NUMBER

REVISED: OCT. 15, 2014
REVISED: OCT. 22, 2014

ENGINEER
ATLANTIC ENGINEERING & SURVEY CONSULTANTS INC.
87 TENNEY STREET - GEORGETOWN, MA 01833
PHONE: 978-352-7870 FAX: 978-352-9940

PREPARED FOR: HAZEN PAPER COMPANY
240 S. WATER STREET
HOLYOKE, MA 01240

DRAWING FILE: SEGBB\HAZEN-2008-ALTA.DWG
JOB NO. A1407-06 DATE: AUG. 21, 2014

60 0 60 120
Scale: 1" = 60'

ALTA/ACSM LAND TITLE SURVEY
OF
295 PARK STREET
LOT 2A-2
IN
GREAT BARRINGTON, MASS.

SHEET 2 OF 2

Haz. Paper Housatic Discharge

Hazen paper Company- Housatonic
Surface Water Temperature Rise Calculations

Outfalls #1
well water as source

max reported effluent ^{0} F	63.7
Ma Warm Water Fishery upstream measured temp ^{0} F	55
max flow MGD	1
7Q10 for Housatonic River MGD	45

$$T_F = \frac{mpTp + mrTr}{mp + mr}$$

$$= \frac{(1*63.7) + (45*55)}{1 + 45}$$

$$= \frac{63.7 + 2475}{46}$$

$$= \frac{2538.7}{46}$$

$$= 55.1899 \ ^0 F$$

$$\Delta Tr = T_F - Tr$$

$$= 55.189 - 55$$

$$= 0.189 \ ^0 F$$

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ANALYTICAL REPORT

PREPARED FOR

Attn: Ms. Gail Calvanese
Hazen Paper Company
240 South Water Street
PO BOX 189
Holyoke, Massachusetts 01041

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JOB DESCRIPTION

Laboratory Analysis

JOB NUMBER

620-20867-1

Eurofins Rhode Island
646 Camp Ave
North Kingstown RI 02852

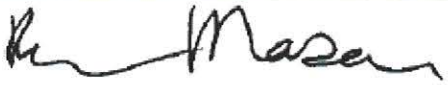
See page two for job notes and contact information.

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing Northeast, LLC Project Manager.

Authorization



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Authorized for release by
Becky Mason, Project Manager II
Becky.Mason@et.eurofinsus.com
(413)642-2617

Table of Contents

Definitions/Glossary

Client: Hazen Paper Company
Project/Site: Laboratory Analysis

Job ID: 620-20867-1

Qualifiers

General Chemistry

Qualifier	Qualifier Description
HF	Parameter with a holding time of 15 minutes. Test performed by laboratory at client's request. Sample was analyzed outside of hold time.

Rad

Qualifier	Qualifier Description
*	LCS or LCSD is outside acceptance limits.
G	The Sample MDC is greater than the requested RL.
U	Result is less than the sample detection limit.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
¤	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Job Narrative
620-20867-1

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable.

- Matrix QC may not be reported if insufficient sample is provided or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

Receipt
The samples were received on 9/11/2024 3:05 PM. Unless otherwise noted below, the samples arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 4.0°C.

Subcontract Work
Method Chromium, Hexavalent: This method was subcontracted to Phoenix Environmental Laboratories, Inc. The subcontract laboratory certification is different from that of the facility issuing the final report. The subcontract report is appended in its entirety.

HPLC/IC
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Metals
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

General Chemistry
Method D1293_99B: This analysis is normally performed in the field and has a method-defined holding time of 15 minutes. The following samples has been qualified with the "HF" flag to indicate analysis was performed in the laboratory outside the 15 minute timeframe: Discharge (620-20867-1) and River (620-20867-2).

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Gas Flow Proportional Counter
Method 900.0: Gross Alpha Beta prep batch 160-679570:

The detection goal was not met for the following samples due to a reduction of the sample size attributed to high residual mass: River (620-20867-2), (160-55429-A-1-A) and (160-55429-A-1-D DU). Analytical results are reported with the detection limit achieved.

Method 903.0: Radium-226 prep batch 160-680375
Insufficient sample volume was available to perform a sample duplicate for the following samples: Discharge (620-20867-1) and River (620-20867-2). A laboratory control sample/ laboratory control sample duplicate (LCS/LCSD) were prepared instead to demonstrate batch precision.

Method 903.0: Radium 226 Batch 680375

160-680375
Based upon client request, Ra-226 is reported without the standard 21-day waiting period which ensures short-lived alpha-emitting radium isotopes (e.g. Ra-224) have decayed out. The Ra-226 result should be considered to be potentially high biased. Associated samples have activity below the RL Discharge (620-20867-1), River (620-20867-2), (LCS 160-680375/2-A), (LCSD 160-680375/3-A) and (MB 160-680375/1-A)

Method 903.0: Radium 226 Batch 680375

The Radium-226 laboratory control sample (LCS) recovery associated with the following sample(s) is outside the upper QC limit of (125%) indicating a potential positive bias for that analyte. This analyte was not observed above the MDC/RL in the associated

samples; therefore the sample data is not adversely affected by this excursion. The data have been reported with this narrative.
Discharge (620-20867-1) and River (620-20867-2)

Method 904.0: Radium-228 prep batch 160-680376
Insufficient sample volume was available to perform a sample duplicate for the following samples: Discharge (620-20867-1) and River (620-20867-2). A laboratory control sample/ laboratory control sample duplicate (LCS/LCSD) were prepared instead to demonstrate batch precision.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Rad
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Client Sample ID: Discharge

Date Collected: 09/11/24 14:25
Date Received: 09/11/24 15:05

Lab Sample ID: 620-20867-1

Matrix: Water

Method: EPA 300.0 - Anions, Ion Chromatography

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chloride	**6.1**		3.2		mg/L			09/26/24 01:33	10

Method: EPA 200.7 Rev 4.4 - Metals (ICP)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Antimony	ND		0.012		mg/L		09/12/24 16:52	09/13/24 13:22	1
Arsenic	ND		0.0080		mg/L		09/12/24 16:52	09/13/24 13:22	1
Cadmium	ND		0.0050		mg/L		09/12/24 16:52	09/13/24 13:22	1
Chromium	ND		0.010		mg/L		09/12/24 16:52	09/13/24 13:22	1
Copper	**0.058**		0.010		mg/L		09/12/24 16:52	09/13/24 13:22	1
Iron	ND		0.10		mg/L		09/12/24 16:52	09/13/24 13:22	1
Lead	ND		0.015		mg/L		09/12/24 16:52	09/13/24 13:22	1
Nickel	ND		0.010		mg/L		09/12/24 16:52	09/13/24 13:22	1
Silver	ND		0.010		mg/L		09/12/24 16:52	09/13/24 13:22	1
Zinc	**0.50**		0.020		mg/L		09/12/24 16:52	09/13/24 13:22	1

Method: EPA 200.8 - Metals (ICP/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Uranium	ND		1.0		ug/L		09/16/24 14:07	09/17/24 12:53	2

Method: EPA 245.1 - Mercury (CVAA)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.00020		mg/L		09/16/24 08:23	09/16/24 14:59	1

Method: SM 2340B - Total Hardness (as CaCO3) by calculation

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Hardness as calcium carbonate	**190**		1.5		mg/L			09/16/24 10:49	1
Calcium hardness as calcium carbonate	**110**		1.2		mg/L			09/16/24 10:49	1

General Chemistry

Analyte	Result	Qualifier	NONE	NONE	Unit	D	Prepared	Analyzed	Dil Fac
pH (ASTM D1293-99B)	**7.8**	**HF**			SU			09/13/24 14:56	1
Temperature (ASTM D1293-99B)	**31**	**HF**			Degrees C			09/13/24 14:56	1

Method: EPA 900.0 - Gross Alpha and Gross Beta Radioactivity

Analyte	Result	Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	MDC	Unit	Prepared	Analyzed	Dil Fac
Gross Alpha	**2.58**		1.56	1.59	2.16	pCi/L	09/16/24 08:48	09/17/24 19:36	1

Method: EPA 903.0 - Radium-226 (GFPC)

Analyte	Result	Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	MDC	Unit	Prepared	Analyzed	Dil Fac
Radium-226	0.0387	U *	0.154	0.154	0.292	pCi/L	09/20/24 14:57	10/01/24 07:33	1

Carrier	*%Yield*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
Ba Carrier	*88.1*		*30 - 110*	*09/20/24 14:57*	*10/01/24 07:33*	*1*

Client Sample ID: Discharge

Date Collected: 09/11/24 14:25
Date Received: 09/11/24 15:05

Lab Sample ID: 620-20867-1
Matrix: Water

Method: EPA 904.0 - Radium-228 (GFPC)

Analyte	Result	Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	MDC	Unit	Prepared	Analyzed	Dil Fac
Radium-228	0.228	U	0.354	0.354	0.600	pCi/L	09/20/24 15:00	09/30/24 11:49	1

Carrier	*%Yield*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
Ba Carrier	*88.1*		*30 - 110*	*09/20/24 15:00*	*09/30/24 11:49*	*1*
Y Carrier	*78.5*		*30 - 110*	*09/20/24 15:00*	*09/30/24 11:49*	*1*

Method: TAL-STL Ra226_Ra228 Pos - Combined Radium-226 and Radium-228

Analyte	Result	Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	MDC	Unit	Prepared	Analyzed	Dil Fac
Radium 226 and 228	0.267	U	0.386	0.386	0.600	pCi/L		09/27/24 17:17	1

Method: Chromium, Hexavalent - SM 3500 Cr B - Hexavalent Chromium

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chromium, Hexavalent	ND		0.01		mg/L		09/11/24 21:10	09/11/24 21:10	1

Client Sample ID: River

Date Collected: 09/11/24 13:55
Date Received: 09/11/24 15:05

Lab Sample ID: 620-20867-2
Matrix: Water

Method: EPA 300.0 - Anions, Ion Chromatography

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chloride	**6.2**		1.6		mg/L			09/26/24 01:48	5

Method: EPA 200.7 Rev 4.4 - Metals (ICP)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Antimony	ND		0.012		mg/L		09/12/24 16:52	09/13/24 13:40	1
Arsenic	ND		0.0080		mg/L		09/12/24 16:52	09/13/24 13:40	1
Cadmium	ND		0.0050		mg/L		09/12/24 16:52	09/13/24 13:40	1
Chromium	ND		0.010		mg/L		09/12/24 16:52	09/13/24 13:40	1
Copper	ND		0.010		mg/L		09/12/24 16:52	09/13/24 13:40	1
Iron	**0.13**		0.10		mg/L		09/12/24 16:52	09/13/24 13:40	1
Lead	ND		0.015		mg/L		09/12/24 16:52	09/13/24 13:40	1
Nickel	ND		0.010		mg/L		09/12/24 16:52	09/13/24 13:40	1
Silver	ND		0.010		mg/L		09/12/24 16:52	09/13/24 13:40	1
Zinc	ND		0.020		mg/L		09/12/24 16:52	09/13/24 13:40	1

Method: EPA 200.8 - Metals (ICP/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Uranium	ND		1.0		ug/L		09/16/24 14:07	09/17/24 13:07	2

Method: EPA 245.1 - Mercury (CVAA)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.00020		mg/L		09/16/24 08:23	09/16/24 15:01	1

Method: SM 2340B - Total Hardness (as CaCO3) by calculation

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Hardness as calcium carbonate	**180**		1.5		mg/L			09/16/24 10:49	1
Calcium hardness as calcium carbonate	**110**		1.2		mg/L			09/16/24 10:49	1

Client Sample ID: River

Date Collected: 09/11/24 13:55
Date Received: 09/11/24 15:05

Lab Sample ID: 620-20867-2

Matrix: Water

General Chemistry

Analyte	Result	Qualifier	NONE	NONE	Unit	D	Prepared	Analyzed	Dil Fac
pH (ASTM D1293-99B)	8.0	HF			SU			09/13/24 14:56	1
Temperature (ASTM D1293-99B)	31	HF			Degrees C			09/13/24 14:56	1

Method: EPA 900.0 - Gross Alpha and Gross Beta Radioactivity

Analyte	Result	Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	MDC	Unit	Prepared	Analyzed	Dil Fac
Gross Alpha	1.00	U G	1.89	1.89	3.26	pCi/L	09/16/24 08:48	09/17/24 19:36	1

Method: EPA 903.0 - Radium-226 (GFPC)

Analyte	Result	Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	MDC	Unit	Prepared	Analyzed	Dil Fac
Radium-226	0.0215	U *	0.150	0.150	0.292	pCi/L	09/20/24 14:57	10/01/24 07:33	1

Carrier	*%Yield*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
Ba Carrier	*90.6*		*30 - 110*	*09/20/24 14:57*	*10/01/24 07:33*	*1*

Method: EPA 904.0 - Radium-228 (GFPC)

Analyte	Result	Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	MDC	Unit	Prepared	Analyzed	Dil Fac
Radium-228	-0.328	U	0.260	0.261	0.585	pCi/L	09/20/24 15:00	09/30/24 11:49	1

Carrier	*%Yield*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
Ba Carrier	*90.6*		*30 - 110*	*09/20/24 15:00*	*09/30/24 11:49*	*1*
Y Carrier	*81.5*		*30 - 110*	*09/20/24 15:00*	*09/30/24 11:49*	*1*

Method: TAL-STL Ra226_Ra228 Pos - Combined Radium-226 and Radium-228

Analyte	Result	Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	MDC	Unit	Prepared	Analyzed	Dil Fac
Radium 226 and 228	0.0215	U	0.300	0.301	0.585	pCi/L		09/27/24 17:17	1

Method: Chromium, Hexavalent - SM 3500 Cr B - Hexavalent Chromium

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chromium, Hexavalent	ND		0.01		mg/L		09/11/24 21:11	09/11/24 21:11	1

Lab Chronicle

Client: Hazen Paper Company
Project/Site: Laboratory Analysis

Job ID: 620-20867-1

Client Sample ID: Discharge

Date Collected: 09/11/24 14:25
Date Received: 09/11/24 15:05

Lab Sample ID: 620-20867-1
Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	300.0		10	997950	OXG	EET EDI	09/26/24 01:33
Total/NA	Prep	200.7			38815	JPC	EET RI	09/12/24 16:52
Total/NA	Analysis	200.7 Rev 4.4		1	38856	JPC	EET RI	09/13/24 13:22
Total/NA	Prep	200.7/200.8			679707	JSM	EET SL	09/16/24 14:07
Total/NA	Analysis	200.8		2	680009	CGB	EET SL	09/17/24 12:53
Total/NA	Prep	245.1			38857	PRB	EET RI	09/16/24 08:23
Total/NA	Analysis	245.1		1	38898	PRB	EET RI	09/16/24 14:59
Total/NA	Analysis	SM 2340B		1	38886	JPC	EET RI	09/16/24 10:49
Total/NA	Analysis	D1293-99B		1	38850	MJH	EET RI	09/13/24 14:56
Total/NA	Prep	Evaporation			679570	MEH	EET SL	09/16/24 08:48
Total/NA	Analysis	900.0		1	679726	SCB	EET SL	09/17/24 19:36
Total/NA	Prep	PrecSep-7			680375	BCE	EET SL	09/20/24 14:57
Total/NA	Analysis	903.0		1	681677	SWS	EET SL	10/01/24 07:33
Total/NA	Prep	PrecSep_0			680376	BCE	EET SL	09/20/24 15:00
Total/NA	Analysis	904.0		1	681511	SCB	EET SL	09/30/24 11:49
Total/NA	Analysis	Ra226_Ra228 Pos		1	681368	SCB	EET SL	09/27/24 17:17
Total/NA	Prep	SM3500CRB		1	748554A_P		PEL, Inc	09/11/24 21:10
Total/NA	Analysis	Chromium, Hexavalent		1	748554A	CT007	PEL, Inc	09/11/24 21:10

Client Sample ID: River

Date Collected: 09/11/24 13:55
Date Received: 09/11/24 15:05

Lab Sample ID: 620-20867-2
Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	300.0		5	997950	OXG	EET EDI	09/26/24 01:48
Total/NA	Prep	200.7			38815	JPC	EET RI	09/12/24 16:52
Total/NA	Analysis	200.7 Rev 4.4		1	38856	JPC	EET RI	09/13/24 13:40
Total/NA	Prep	200.7/200.8			679707	JSM	EET SL	09/16/24 14:07
Total/NA	Analysis	200.8		2	680009	CGB	EET SL	09/17/24 13:07
Total/NA	Prep	245.1			38857	PRB	EET RI	09/16/24 08:23
Total/NA	Analysis	245.1		1	38898	PRB	EET RI	09/16/24 15:01
Total/NA	Analysis	SM 2340B		1	38886	JPC	EET RI	09/16/24 10:49
Total/NA	Analysis	D1293-99B		1	38850	MJH	EET RI	09/13/24 14:56
Total/NA	Prep	Evaporation			679570	MEH	EET SL	09/16/24 08:48
Total/NA	Analysis	900.0		1	679726	SCB	EET SL	09/17/24 19:36
Total/NA	Prep	PrecSep-7			680375	BCE	EET SL	09/20/24 14:57
Total/NA	Analysis	903.0		1	681677	SWS	EET SL	10/01/24 07:33
Total/NA	Prep	PrecSep_0			680376	BCE	EET SL	09/20/24 15:00
Total/NA	Analysis	904.0		1	681511	SCB	EET SL	09/30/24 11:49
Total/NA	Analysis	Ra226_Ra228 Pos		1	681368	SCB	EET SL	09/27/24 17:17
Total/NA	Prep	SM3500CRB		1	748554A_P		PEL, Inc	09/11/24 21:11
Total/NA	Analysis	Chromium, Hexavalent		1	748554A	CT007	PEL, Inc	09/11/24 21:11

Lab Chronicle

Client: Hazen Paper Company
Project/Site: Laboratory Analysis

Job ID: 620-20867-1

Laboratory References:

EET EDI = Eurofins Edison, 777 New Durham Road, Edison, NJ 08817, TEL (732)549-3900

EET RI = Eurofins Rhode Island, 646 Camp Ave, North Kingstown, RI 02852, TEL (413)789-9018

EET SL = Eurofins St. Louis, 13715 Rider Trail North, Earth City, MO 63045, TEL (314)298-8566

PEL, Inc = Phoenix Environmental Laboratories, Inc., 587 East Middle Turnpike, Manchester, CT 06040, TEL (860)645-8726

Accreditation/Certification Summary

Client: Hazen Paper Company
Project/Site: Laboratory Analysis

Job ID: 620-20867-1

Laboratory: Eurofins Rhode Island

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	Identification Number	Expiration Date
Massachusetts	State	M-RI907	06-30-25

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

Analysis Method	Prep Method	Matrix	Analyte
200.7 Rev 4.4	200.7	Water	Antimony
200.7 Rev 4.4	200.7	Water	Lead
D1293-99B		Water	pH
D1293-99B		Water	Temperature
SM 2340B		Water	Calcium hardness as calcium carbonate

Laboratory: Eurofins Edison

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Connecticut	State	PH-0818	09-30-24
DE Haz. Subst. Cleanup Act (HSCA)	State	N/A	01-02-25
Georgia	State	12028 (NJ)	07-01-25
Massachusetts	State	M-NJ312	07-01-25
New Jersey	NELAP	12028	06-30-25
New York	NELAP	11452	04-01-25
Pennsylvania	NELAP	68-00522	02-28-25
Rhode Island	State	LAO00376	12-31-24
USDA	US Federal Programs	525-24-149-77606	05-21-27

Laboratory: Eurofins St. Louis

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Alaska (UST)	State	20-001	05-06-25
ANAB	Dept. of Defense ELAP	L2305	04-06-25
ANAB	Dept. of Energy	L2305.01	04-08-25
ANAB	ISO/IEC 17025	L2305	04-06-25
Arizona	State	AZ0813	12-08-24
California	Los Angeles County Sanitation Districts	10259	06-30-22 *
California	State	2886	06-30-25
Connecticut	State	PH-0241	03-31-25
Florida	NELAP	E87689	06-30-25
HI - RadChem Recognition	State	n/a	06-30-25
Illinois	NELAP	200023	11-30-25
Iowa	State	373	12-01-24
Kansas	NELAP	E-10236	10-31-24
Kentucky (DW)	State	KY90125	12-31-24
Kentucky (WW)	State	KY90125 (Permit KY0004049)	12-31-24
Louisiana	NELAP	04080	06-30-22 *
Louisiana (All)	NELAP	04080	06-30-25
Louisiana (DW)	State	LA011	12-31-24
Maryland	State	310	09-30-25
Massachusetts	State	M-MO054	06-30-25
Missouri	State	780	06-30-25

* Accreditation/Certification renewal pending - accreditation/certification considered valid.

Accreditation/Certification Summary

Client: Hazen Paper Company
Project/Site: Laboratory Analysis

Job ID: 620-20867-1

Laboratory: Eurofins St. Louis (Continued)

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Nevada	State	MO00054	07-31-25
New Jersey	NELAP	MO002	06-30-25
New Mexico	State	MO00054	06-30-25
New York	NELAP	11616	03-31-25
North Carolina (DW)	State	29700	07-31-25
North Dakota	State	R-207	12-31-24
Oregon	NELAP	4157	09-01-25
Pennsylvania	NELAP	68-00540	02-28-25
South Carolina	State	85002001	06-30-24 *
Texas	NELAP	T104704193	07-31-25
US Fish & Wildlife	US Federal Programs	058448	07-31-25
USDA	US Federal Programs	P330-17-00028	05-18-26
Utah	NELAP	MO00054	07-31-25
Virginia	NELAP	460230	06-14-25
Washington	State	C592	08-30-25
West Virginia DEP	State	381	10-31-24

* Accreditation/Certification renewal pending - accreditation/certification considered valid.

Method Summary

Client: Hazen Paper Company
Project/Site: Laboratory Analysis

Job ID: 620-20867-1

Method	Method Description	Protocol	Laboratory
300.0	Anions, Ion Chromatography	EPA	EET EDI
200.7 Rev 4.4	Metals (ICP)	EPA	EET RI
200.8	Metals (ICP/MS)	EPA	EET SL
245.1	Mercury (CVAA)	EPA	EET RI
SM 2340B	Total Hardness (as CaCO3) by calculation	SM	EET RI
D1293-99B	pH	ASTM	EET RI
900.0	Gross Alpha and Gross Beta Radioactivity	EPA	EET SL
903.0	Radium-226 (GFPC)	EPA	EET SL
904.0	Radium-228 (GFPC)	EPA	EET SL
Ra226_Ra228 Pos	Combined Radium-226 and Radium-228	TAL-STL	EET SL
3500 Cr B	SM 3500 Cr B - Hexavalent Chromium	SM	PEL, Inc
200.7	Preparation, Total Metals	EPA	EET RI
200.7/200.8	Preparation, Metals	EPA	EET SL
245.1	Preparation, Mercury	EPA	EET RI
Evaporation	Preparation, Evaporation	None	EET SL
PrecSep_0	Preparation, Precipitate Separation	None	EET SL
PrecSep-7	Preparation, Precipitate Separation (7-Day In-Growth)	None	EET SL

Protocol References:

ASTM = ASTM International
EPA = US Environmental Protection Agency
None = None
SM = "Standard Methods For The Examination Of Water And Wastewater"
TAL-STL = TestAmerica Laboratories, St. Louis, Facility Standard Operating Procedure.

Laboratory References:

EET EDI = Eurofins Edison, 777 New Durham Road, Edison, NJ 08817, TEL (732)549-3900
EET RI = Eurofins Rhode Island, 646 Camp Ave, North Kingstown, RI 02852, TEL (413)789-9018
EET SL = Eurofins St. Louis, 13715 Rider Trail North, Earth City, MO 63045, TEL (314)298-8566
PEL, Inc = Phoenix Environmental Laboratories, Inc., 587 East Middle Turnpike, Manchester, CT 06040, TEL (860)645-8726

Sample Summary

Client: Hazen Paper Company
Project/Site: Laboratory Analysis

Job ID: 620-20867-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
620-20867-1	Discharge	Water	09/11/24 14:25	09/11/24 15:05
620-20867-2	River	Water	09/11/24 13:55	09/11/24 15:05

Eurofins Rhode Island
646 Camp Ave
North Kingstown, RI 02852
Phone: 413-789-9018 Fax: 413-506-3830

Chain of Custody Record

20867

eurofins | Environment Testing

Client Information	Sampler	Lab PM: Mason, Becky C	Carrier Tracking No(s):	COC No: 620-19028-2333.1
Client Contact: Ms. Gail Calvanese	Phone:	E-Mail: Becky.Mason@et.eurofinsus.com	State of Origin:	Page: Page 1 of 1
Company: Hazen Paper Company	PWSID:	Analysis Requested		Job #:
Address: 240 South Water Street PO BOX 189	Due Date Requested:			Preservation Codes: N None D HNO3
City: Holyoke	TAT Requested (days):			
State, Zip: MA, 01041	Compliance Project: Δ Yes Δ No			
Phone: 413-538-8204(Tel)	PO #: Purchase Order not required			
Email: gail@hazen.com	WO #:			
Project Name: Laboratory Analysis	Project #: 62000746			Other
Site: Holyoke	SSOW#:			

Sample Identification	Sample Date	Sample Time	Sample Type (C=comp, G=grab)	Matrix (W=water, S=solid, O=waste/oil, BT=Tissue, A=Air)	Field Filtered Sample (Yes or No)	Perform MS/MSD (Yes or No)	3500_CR_B Chromium, Hexavalent	200.7	SM7110B Gross Alpha and Gross Beta Radioactivity	200.8_U Metals (ICP/MS)	Total Number of containers	Special Instructions/Note:
			Preservation Code:				N	D	D	D		
Holyoke Tailrace -1	9/11/24	1420	G	Water			✓	✓	✓	✓		
Connecticut River -2	9/11/24	1505	G	Water			✓	✓	✓	✓		

620-20867 Chain of Custody

Possible Hazard Identification	Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown ☐ Radiological	☐ Return To Client ☐ Disposal By Lab ☐ Archive For _____ Months
Deliverable Requested: I, II, III IV Other (specify)	Special Instructions/QC Requirements:

Empty Kit Relinquished by:	Date:	Time:	Method of Shipment:

Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
	9/11/24 1505			9/11/24 1505	ENE
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company

Custody Seals Intact: Δ Yes Δ No	Custody Seal No.	Cooler Temperature(s) °C and Other Remarks:	Ver 05/06/2024
		3.6/to 4/4.0 IR ~ iced	

Eurofins Rhode Island
646 Camp Ave
North Kingstown, RI 02852
Phone: 413-789-9018 Fax: 413-506-3830

Chain of Custody Record

eurofins | Environment Testing

Client Information (Sub Contract Lab)	Sampler	Lab PM: Mason, Becky C	Carrier Tracking No(s):	COC No: 620-16982.1
Client Contact: Shipping/Receiving	Phone	E-Mail: Becky.Mason@et.eurofinsus.com	State of Origin: Massachusetts	Page: Page 1 of 1
Company: TestAmerica Laboratories, Inc.		Accreditations Required (See note): State - Massachusetts		Job #: 620-20867-1
Address: 13715 Rider Trail North,	Due Date Requested: 9/24/2024	Analysis Requested		Preservation Codes:
City: Earth City	TAT Requested (days):			
State, Zip: MO, 63045				
Phone: 314-298-8566(Tel) 314-298-8757(Fax)	PO #:			
Email:	WO #:			
Project Name: Laboratory Analysis	Project #: 62000746			
Site:	SSOW#:			Other:

Sample Identification - Client ID (Lab ID)	Sample Date	Sample Time	Sample Type (C=comp, G=grab)	Matrix (W=water, S=solid, O=waste/oil, BT=Tissue, A=Air)	Field Filtered Sample (Yes or No)	Perform MS/MSD (Yes or No)	200.8/200_2%P Uranium	900.0/Evaporation Gross Alpha Only	903.0/PrecSep_7 Standard Target List	904.0/PrecSep_0 Standard Target List	Ra226_228GFPC_P/ Combined Radium-226 and Radium-228	Total Number of containers	Special Instructions/Note:
			Preservation Code:										
Discharge (620-20867-1)	9/11/24	14:25 Eastern	G	Water			X	X	X	X	X	4	
River (620-20867-2)	9/11/24	13:55 Eastern	G	Water			X	X	X	X	X	4	

Note: Since laboratory accreditations are subject to change, Eurofins Environment Testing Northeast, LLC places the ownership of method, analyte & accreditation compliance upon our subcontract laboratories. This sample shipment is forwarded under chain-of-custody. If the laboratory does not currently maintain accreditation in the State of Origin listed above for analysis/tests/matrix being analyzed, the samples must be shipped back to the Eurofins Environment Testing Northeast, LLC laboratory or other instructions will be provided. Any changes to accreditation status should be brought to Eurofins Environment Testing Northeast, LLC attention immediately. If all requested accreditations are current to date, return the signed Chain of Custody attesting to said compliance to Eurofins Environment Testing Northeast, LLC.

Possible Hazard Identification: Unconfirmed	Sample Disposal (A fee may be assessed if samples are retained longer than 1 month): ☐ Return To Client ☐ Disposal By Lab ☐ Archive For ____ Months
Deliverable Requested: I, II, III, IV, Other (specify) Primary Deliverable Rank: 1	Special Instructions/QC Requirements:

Empty Kit Relinquished by:	Date:	Time:	Method of Shipment:

Relinquished by	Date/Time	Company	Received by	Date/Time	Company
	9/13/24 17:23	ERI			
Relinquished by	Date/Time	Company	Received by: M Pinette	Date/Time: SEP 13 2024 8:20	Company
Relinquished by	Date/Time	Company	Received by	Date/Time	Company

Custody Seals Intact: Δ Yes Δ No	Custody Seal No.	Cooler Temperature(s) °C and Other Remarks

Ver: 05/06/2024

10/3/2024

Eurofins Rhode Island
646 Camp Ave
North Kingstown, RI 02852
Phone: 413-789-9018 Fax: 413-506-3830

Chain of Custody Record

eurofins | Environment Testing

Client Information (Sub Contract Lab)	Sampler:	Lab PM: Mason, Becky C	Carrier Tracking No(s):	COC No: 620-17055.1
Client Contact: Shipping/Receiving	Phone:	E-Mail: Becky.Mason@et.eurofinsus.com	State of Origin: Massachusetts	Page: Page 1 of 1
Company: Eurofins Environment Testing Northeast L		Accreditations Required (See note): State Massachusetts		Job #: 620-20867 1
Address: 777 New Durham Road,	Due Date Requested: 10/1/2024	**Analysis Requested**		Preservation Codes:
City: Edison	TAT Requested (days):			
State, Zip: NJ 08817				
Phone: 732-549-3900(Tel) 732-549-3679(Fax)	PO #:			
Email:	WO #:			
Project Name: Laboratory Analysis	Project #: 62000746			
Site:	SSOW#:			Other:

Sample Identification - Client ID (Lab ID)	Sample Date	Sample Time	Sample Type (C=comp, G=grab)	Matrix (W=water, S=solid, O=waste/oil, BT=Tissue, A=Air)	Field Filtered Sample (Yes or No)	Perform MS/MSD (Yes or No)	300_ORGFM_28D/ Chloride	Total Number of containers	Special Instructions/Note:
			Preservation Code:						
Discharge (620-20867 1)	9/11/24	14:25 Eastern	G	Water			X	1	
River (620-20867-2)	9/11/24	13:55 Eastern	G	Water			X	1	

Note: Since laboratory accreditations are subject to change, Eurofins Environment Testing Northeast, LLC places the ownership of method, analyte & accreditation compliance upon our subcontract laboratories. This sample shipment is forwarded under chain-of-custody. If the laboratory does not currently maintain accreditation in the State of Origin listed above for analysis/tests/matrix being analyzed, the samples must be shipped back to the Eurofins Environment Testing Northeast, LLC laboratory or other instructions will be provided. Any changes to accreditation status should be brought to Eurofins Environment Testing Northeast, LLC attention immediately. If all requested accreditations are current to date, return the signed Chain of Custody attesting to said compliance to Eurofins Environment Testing Northeast, LLC.

Possible Hazard Identification
Unconfirmed

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ *Return To Client* ☐ *Disposal By Lab* ☐ *Archive For* ________ *Months*

Deliverable Requested: I II III, IV Other (specify) — Primary Deliverable Rank: 1

Special Instructions/QC Requirements:

Empty Kit Relinquished by:	Date:	Time:	Method of Shipment: Fedex		
Relinquished by: [signature]	Date/Time: 9/17/24 1731	Company: EQI	Received by: B Palu	Date/Time: 9/18/24 1040	Company
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
Custody Seals Intact: Δ Yes Δ No	Custody Seal No.		Cooler Temperature(s) °C and Other Remarks:		

IR-9 0 9 c 1.1 c 1.2 c 1.4 c

Ver: 05/06/2024

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Login Sample Receipt Checklist

Client: Hazen Paper Company

Job Number: 620-20867-1

Login Number: 20867
List Number: 1
Creator: Makhoul, Elie

List Source: Eurofins Rhode Island

Question	Answer	Comment
Radioactivity wasn't checked or is </= background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Login Sample Receipt Checklist

Client: Hazen Paper Company

Job Number: 620-20867-1

Login Number: 20867
List Number: 3
Creator: Armbruster, Chris

List Source: Eurofins Edison
List Creation: 09/18/24 12:15 PM

Question	Answer	Comment
Radioactivity wasn't checked or is </= background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	0.9/1.1°, 1.2/1.4°C IR9
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Login Sample Receipt Checklist

Client: Hazen Paper Company

Job Number: 620-20867-1

Login Number: 20867
List Number: 2
Creator: Pinette, Meadow L

List Source: Eurofins St. Louis
List Creation: 09/13/24 12:38 PM

Question	Answer	Comment
Radioactivity wasn't checked or is </= background as measured by a survey meter.	True	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	N/A	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	N/A	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

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Invoice No.	6200019932	**Invoice Date**	October 03, 2024
Terms	Net 30 days	**Federal Tax ID**	47-4895193
Remit to	Eurofins Environment Testing Northeast, LLC PO BOX 1465, Carol Stream, IL 60132-1465		
Wire	Citibank ABA: 031100209 Acct# 38996683 SWIFT Code: CITIUS33		
ACH	Citibank ABA: 031100209 Acct# 38996683 SWIFT Code: CITIUS33		

Bill to:

Hazen Paper Company
Attn: Accounts Payable
240 S Water St
PO Box 189
Holyoke, MA 01040

Ship to:

Hazen Paper Company
240 South Water Street
PO BOX 189
Holyoke, MA 01041

P.O. Number	W.O. Number	Contract Number	Work Ordered by
96464			Ms. Gail Calvanese
Job Description	**Site Name**	**SDG Number**	**Invoice Contact**
See below			Ms. Gail Calvanese

Job No.	Job Description / Method/Test Description	Receipt Date	Quantity	Unit Price	Amount
J20867-1	**Laboratory Analysis**	09/11/2024			
	200.8 - Uranium		2.00	60.00	120.00
	900.0 - Gross Alpha Only		2.00	75.00	150.00
	903.0 - Radium- 226 (with reduced in-growth period)		2.00	130.00	260.00
	904.0 - Radium- 228		2.00	130.00	260.00
	Ra226_Ra228 Pos - Combined Radium-226 and Radium-22		2.00	20.00	40.00
	300.0 - Chloride		2.00	18.00	36.00
	200.7 Rev 4.4 - Permit Metals (ICP-Trace)		2.00	70.00	140.00
	245.1 - Mercury		2.00	25.00	50.00
	D1293-99B - pH		2.00	17.00	34.00
	SM 2340B - Total Hardness (as CaCO3) by calculation		2.00	18.00	36.00
	3500 Cr B - Chromium, Hexavalent		2.00	36.00	72.00
	Safe and Environmentally Responsible Waste Management (per sample)		2.00	6.00	12.00
	Minimum Charge Amount of $150.00 met		1.00	0.00	0.00

Project Number	Client Number	Project Manager	Subtotal (USD)	$1,210.00
62000746	9265	Becky Mason		
Latest Sample Receipt Date	**Latest Report Date**	**Phone Number**	**Total (USD)**	**$1,210.00**
09/11/2024	10/03/2024	(413) 642-2617		

For proper credit, please include invoice number on all remittance.

Eurofins Rhode Island
646 Camp Ave
North Kingstown, RI 02852
Phone: 413-789-9018 Fax: 413-506-3830

Chain of Custody Record

20867

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Client Information	Sampler:	Lab PM: Mason, Becky C	Carrier Tracking No(s):	COC No: 620-19028-2333.1
Client Contact: Ms. Gail Calvanese	Phone:	E-Mail: Becky Mason@et.eurofinsus.com	State of Origin:	Page: Page 1 of 1
Company: Hazen Paper Company	PWSID:	**Analysis Requested**		Job #:
Address: 240 South Water Street PO BOX 189	Due Date Requested:			Preservation Codes: N None, D HNO3
City: Holyoke	TAT Requested (days):			
State, Zip: MA, 01041	Compliance Project: Δ Yes Δ No			
Phone: 413-538-8204(Tel)	PO #: Purchase Order not required			
Email: gail@hazen.com	WO #:			
Project Name: Laboratory Analysis	Project #: 62000746			Other:
Site: HD Sc tm	SSOW#:			

Sample Identification	Sample Date	Sample Time	Sample Type (C=comp, G=grab)	Matrix (W=water, S=solid, O=waste/oil, BT=Tissue, A=Air)	Field Filtered Sample (Yes or No)	Perform MS/MSD (Yes or No)	3500_CR_B Chromium, Hexavalent	200.7	SM7110B Gross Alpha and Gross Beta Radioactivity	200.8_U Metals (ICP/MS)	Total Number of containers	Special Instructions/Note:
				Preservation Code:			N	D	D	D		
Dscharge -1	9/11/24	1425	G	Water			✓	✓	✓	✓		
River -2	9/11/24	155	G	Water			✓	✓	✓	✓		

620-20867 Chain of Custody

Possible Hazard Identification
☐ *Non-Hazard* ☐ *Flammable* ☐ *Skin Irritant* ☐ *Poison B* ☐ *Unknown* ☐ *Radiological*

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ *Return To Client* ☐ *Disposal By Lab* ☐ *Archive For ______ Months*

Deliverable Requested: I, II, III IV Other (specify)

Special Instructions/QC Requirements:

Empty Kit Relinquished by:		Date:	Time:	Method of Shipment:	
Relinquished by: [signature]	Date/Time: 9/11/24 1505	Company	Received by: [signature]	Date/Time: 9/11/24 1505	Company: ENE
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company

Custody Seals Intact: Δ Yes Δ No | Custody Seal No. | Cooler Temperature(s) °C and Other Remarks: 3.6/+0.4/4.0 IR ... recd

Ver 05/06/2024