

VIA EMAIL

Your ref: EPA ID #MID 041 793 340
Waste Data System # 355505
Our ref: 11208041-LTR-3

March 23, 2026

**Mr. Marc Messina
Michigan Department of Environment, Great Lakes, and Energy
Hazardous Waste Section
P.O. Box 30473
Lansing, MI 48909-7973**

**2025 Annual GSI Monitoring Report
EPA ID #MID 041 793 340, Waste Data System # 355505
RACER Nodular Facility – Saginaw Michigan**

Dear Marc,

This letter summarizes the results of the 2025 annual GSI monitoring activities related to the Revitalizing Auto Communities Environmental Response (RACER) Trust Saginaw Nodular Industrial Land (Site), located in Saginaw, Michigan.

The following figures, tables and attachments are included:

Figure 1 2025 Annual Monitoring Results
Table 1 2025 Annual Monitoring Results
Attachment 1 Analytical Report and Data Validation Memorandum

1. Background

The Site was part of a larger facility, owned by the former General Motors Corporation (GMC), called the General Motors Powertrain Saginaw Metal Casting Operations (SMCO or Facility).

On June 1, 2009, GMC filed for Chapter 11 protection under U.S. Bankruptcy Code. On July 10, 2009, GMC was renamed Motors Liquidation Company (MLC). On the same day portions of the operating assets of MLC were sold to a newly formed company "General Motors Company". General Motors Company changed its name to General Motors LLC (GM LLC) on October 16, 2009. Assets not sold to GM LLC remained the property of MLC, in its capacity as debtor in possession in the bankruptcy case. On March 31, 2011, certain environmental obligations for this Site were transferred from MLC to the RACER Trust. Ownership of the Site was transferred to RACER Properties LLC, a wholly owned subsidiary of RACER Trust.

1.1 Mixing-Zone Re-evaluation Criteria

On behalf of RACER Trust, GHD prepared and submitted a re-evaluation of the Mixing Zone Determination Request (MZDR) for the Site in a memorandum dated May 18, 2022 in response to the recommendations made by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Materials Management Division (MMD) Remediation Advisory Team meeting with the U. S. Environmental Protection Agency (U.S. EPA) on January 26, 2022.

In response to the May 18, 2022 request for a Mixing Zone Determination for venting groundwater to the Saginaw River from the Site, EGLE's MMD and Water Resources Division (WRD) identified the acceptable concentration limits of pH and total ammonia for discharge to the Saginaw River in their letter to the U.S. EPA dated October 26, 2022 . The following limits were identified:

pH:	6.5 S.U. to 9.0. S.U.
Ammonia (total):	79 mg/L

In the referenced October 26, 2022 letter, EGLE identified that RACER should continue to implement a mixing zone compliance monitoring program in order to demonstrate compliance with the mixing zone-based groundwater/surface water interface (GSI) criteria.

1.2 GSI Wetland Criteria

Samples were also compared to Michigan Part 4 Water Quality Values as specified in Michigan Administrative Code R 323.1061:

pH:	6.5 S.U. to 9.0. S.U.
FAV for Ammonia:	27 mg/L

The Final Acute Value (FAV) was calculated using an assumed receiving water temperature of 2.9°C and a pH of 7.5. The wetland temperature was assumed based on the average ambient air temperature during the 2025 monitoring event (December 17 and 18, 2025). The pH of 7.5 was selected as we expect surface water to be close to neutral. This correlates to the abundance of plant life in the wetland that is growing, which prefer pH levels near neutral. In future years, we plan to collect a field pH reading of the surface water.

2. 2025 GSI Monitoring

The 2025 sampling scope of work for pH and ammonia included the following:

- To monitor potential impacts to the river:
 - Three compliance wells near the river: MW-03945, MW-04051, and MW-04250R, and
 - Five interior wells: MW-04336, MW-04438R, MW-05036R, MW-05038, and MW-8R.
- To monitor potential impacts to the on-Site wetlands:
 - Three wells interior wells: MW-04336, MW-05036R, and MW-8R (note these locations are already being monitored), and
 - One additional well near the on-site wetlands: MW-36 (if this well is found to be in good condition).

In December 2025, a total of eight wells were sampled for ammonia and pH (both field and laboratory results are collected). Due to snow-covered conditions, MW-36 could not be located.

Table 1 presents the 2025 analytical results. Figure 1 presents the sample results for pH and ammonia from 2011 to the present.

Groundwater levels in the upper water-bearing zone were recorded on December 18, 2025. Figure 1 presents the 2025 groundwater elevations, groundwater contours, and general groundwater flow direction.

2.1 pH Results

The December 2025 pH readings at all GSI compliance points (MW-03945, MW-04051, and MW-04250R) downstream towards the Saginaw River are within the acceptable pH range of 6.5 S.U. to 9.0 S.U.

The December 2025 pH readings at the wells related to the wetlands (MW-04336, MW-05036R, and MW-8R) detected laboratory pH readings ranging from 7.2 to 10.9 S.U., and field pH readings ranging from 10.7 to 11.5 S.U, some of which are outside the acceptable range of pH.

The December 2025 pH readings at two remaining interior monitoring wells (MW-04438R and MW-05038) detected laboratory pH readings of 7.9 and 3.7 S.U., respectively, and field pH readings of 10.2 and 11.5 S.U., respectively, some of which are outside the acceptable range of pH. The laboratory pH reading of 3.7 S.U. at MW-05038 appears to be an outlier as the pH reading collected in the field was 11.5 S.U, which is more consistent with historical pH readings of 8.2 to 10.4 S.U. MW-05038 will continue to be monitored in the following annual sampling event to confirm groundwater conditions.

2.2 Ammonia Results

There were no exceedances of the Saginaw River mixing zone based ammonia GSI criteria or the Michigan Water Quality FAV in any locations monitored in December 2025 at the Site.

3. Proposed changes to the Monitoring Program

3.1 Request to Modify Annual Sampling Locations

On September 25, 2023, RACER met with EGLE to discuss the necessity of continuing annual monitoring for pH and ammonia since there have been no exceedances of Saginaw River mixing zone based GSI criteria in the three compliance monitoring points (MW-03945, MW-04051, and MW-04250R) along the property boundary beside the Saginaw River since 2016. Based on this experience, RACER requests to discontinue sampling at the following locations associated with monitoring potential pH and ammonia impacts to the Saginaw River:

- Three compliance wells: MW-03945, MW-04051, and MW-04250R.
- Two interior wells: MW-04438R, and MW-05038.

In addition, RACER proposes monitoring the following locations in 2026 for potential impacts to the wetlands:

- Three currently monitored wells: MW-04336, MW-05036R, and MW-8R.
- One monitoring well located in the northeast portion of the on-site wetland: MW-36, if this well is found to be in good condition. An attempt will be made to locate and mark this well in the early spring of 2026.
- Collection of a field pH reading of the surface water.

Please note that MW-14831, located southeast of the on-site wetland area, is not a shallow monitoring well and therefore is not appropriate for monitoring potential impacts to the on-Site wetlands.

3.2 Request to Modify pH Analysis Methodology

The current annual sampling plan utilizes laboratory analysis of pH using Method SW-846 9040/SM 4500 H+ B, which has a hold time of 15 minutes. Achieving this quality assurance requirement is not feasible given the sampling methodology and number of locations. Lab pH results have shown anomalous values relative to in-field pH measurements and historical readings at the Site. RACER proposes to discontinue laboratory analysis for pH as this parameter can adequately be monitored using in-field measurements.

4. Conclusion

There were no exceedances of the Saginaw River mixing zone based GSI criteria for pH or ammonia in the three compliance monitoring points along the property boundary beside the Saginaw River during the December 2025 monitoring event. There were no exceedances of the Saginaw River mixing zone based GSI criteria for ammonia in any other monitoring well at the Site. Groundwater venting to the Saginaw River from the RACER Nodular Industrial Land is in compliance with the limits set by the Mixing Zone Determination. There have been no exceedances of the Saginaw River mixing zone based GSI criteria for pH or ammonia at the compliance points (MW-03945, MW-04051, and MW-04250R) along the property boundary beside the Saginaw River since 2016. RACER requests to discontinue sampling at locations associated with the Saginaw River.

There were no exceedances of the Michigan Water Quality GSI FAV criterion for ammonia in the three wells nearest to the wetland during the December 2025 monitoring event. However, pH at these three locations remains out of range of the Michigan Water Quality Values.

RACER proposes to discontinue laboratory analysis for pH as this parameter can adequately be monitored using in-field measurements.

RACER requests EGLE's and U.S. EPA's concurrence to modify the annual pH and ammonia monitoring program to focus on potential impacts to the on-site wetlands.

Should you have any questions or comments, please do not hesitate to call.

Regards,



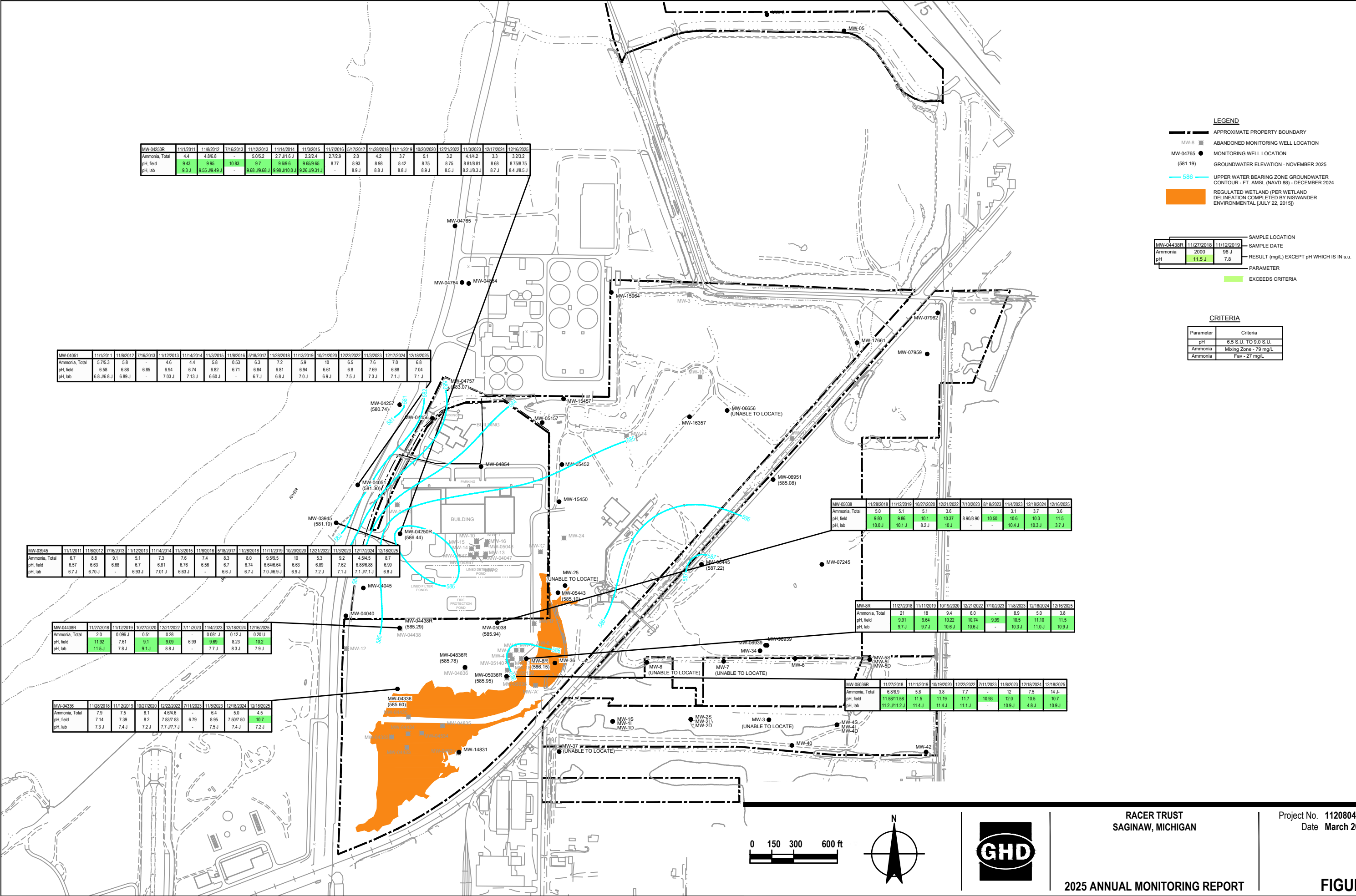
John-Eric Pardys, P. Eng.

zk/kf/3

Encl.

Copy to: Will Grossett, EPA Mixing Zone File, EGLE
EGLE MMD HWS Mailbox (egle-mmd-hws@michigan.gov)
Brendan Mullen, RACER
Dave Favero, RACER
Jessica Gallaway, GHD

Figures



Tables

Table 1
2025 Annual Sample Results
RACER Nodular Facility
Saginaw, Michigan

Sample Location:					MW-8R	MW-03945	MW-04051	MW-04250R	MW-04250R	MW-04336	MW-04438R	MW-05036R	MW-05038
Sample ID:					GW-11208041-121625-BW-003	GW-11208041-121825-BW-008	GW-11208041-121825-BW-009	GW-11208041-121625-BW-001	GW-11208041-121625-BW-002	GW-11208041-121825-BW-007	GW-11208041-121625-BW-005	GW-11208041-121825-BW-006	GW-11208041-121625-BW-004
Sample Date:					12/16/2025	12/18/2025	12/18/2025	12/16/2025	12/16/2025	12/18/2025	12/16/2025	12/18/2025	12/16/2025
Parameters Wet	Units	Mixing Zone	Water Quality						(Duplicate)				
		Rule 53	Rule 57										
		(pH)	FAV										
		Criteria											
		a	b	d									
Ammonia-N	mg/L	79	-	27	3.8	8.7	6.8	3.2	3.2	4.5	0.20 U	14 J-	3.6
pH, lab	s.u.	6.5-9.0	-	-	10.9 J a,b	6.8 J	7.1 J	8.4 J	8.5 J	7.2 J	7.9 J	10.9 J a,b	3.7 J a,b
pH, field	s.u.	6.5-9.0	6.5-9.0	-	11.5 a,b	6.99	7.04	8.75	8.75	10.7 a,b	10.2 a,b	10.7 a,b	11.5 a,b

Footnotes:

U Not detected at the associated reporting limit.

J Estimated concentration.

Criteria:

Mixing zone criteria, EGLE MMD and WRD dated October 26, 2022

Rule 53 Michigan Part 4 Water Quality Standard for hydrogen ion concentration, as specified in Michigan Administrative Code R 323.1061 (R 323.1053)

Rule 57 Michigan Part 4 Water Quality Values for Ammonia, as specified in Michigan Administrative Code R 323.1061 (R 323.1057)

FAV Final Acute Value for ammonia at an assumed wetland temperature of 2.9°C and pH of 7.5.

Attachments

Attachment 1

Analytical Reports and Data Validation Memorandum



Data Verification Report

January 14, 2026

To	Jessica Gallaway	Project No.	11208041
Copy to	Zachary Kanmacher	DVR No.	12
From	Julie Ludie/cs	Contact No.	716-242-6946
Project Name	RACER: Saginaw Nodular Iron, Saginaw	Email	Julie.Lundie@ghd.com
Subject	Analytical Results and Data Verification 2025 Annual Groundwater Sampling for pH and Ammonia Racer Nodular Saginaw, Michigan December 2025		

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

1. Introduction

This document details a data verification of analytical results for groundwater samples collected in support of the 2025 Annual Groundwater Sampling for pH and Ammonia event at the Racer Nodular site during December 2025. Samples were submitted to Eurofins Cleveland located in Barberton, Ohio. A sample collection and analysis summary is presented in Table 1. The validated analytical results are summarized in Table 2. A summary of the analytical methodology is presented in Table 3.

Standard GHD report deliverables were submitted by the laboratory. The final results and supporting quality assurance/quality control (QA/QC) data were assessed. Evaluation of the data was based on information obtained from the chain of custody form, finished report form, method blank data, duplicate data, and recovery data from laboratory control samples (LCS) and field QA/QC samples.

The QA/QC criteria by which these data have been assessed are outlined in the analytical methods referenced in Table 3 and applicable guidance from the documents entitled:

1. "National Functional Guidelines for Inorganic Superfund Methods Data Review",
United States Environmental Protection Agency (USEPA) 542-R-20-006, November 2020.

This will subsequently be referred to as the "Guidelines" in this report.

2. Sample Holding Time and Preservation

The sample holding time and preservation criteria for the analyses are summarized in Table 3. The sample chain of custody document and analytical report were used to determine sample holding times. All samples were prepared and analyzed within the required holding times with the exception of samples submitted for pH analysis, which were qualified as estimated in Table 4.

All samples were properly preserved, delivered on ice, and stored by the laboratory at the required temperature (0-6°C).

3. Laboratory Method Blank Analyses

Method blanks are prepared from a purified matrix and analyzed with investigative samples to determine the existence and magnitude of sample contamination introduced during the analytical procedures.

For this study, laboratory method blanks were analyzed at a minimum frequency of one per analytical batch.

All method blank results were non-detect, indicating that laboratory contamination was not a factor for this investigation.

4. Laboratory Control Sample Analyses

LCS are prepared and analyzed as samples to assess the analytical efficiencies of the methods employed, independent of sample matrix effects.

For this study, LCS were analyzed at a minimum frequency of one per analytical batch.

The LCS contained all analytes of interest. LCS recoveries were assessed per the "Guidelines" using the laboratory control limits. All LCS recoveries were within the control limits, demonstrating acceptable analytical accuracy.

5. Matrix Spike/Matrix Spike Duplicate (MS/MSD) Analyses

To evaluate the effects of sample matrices on the preparation process, measurement procedures, and accuracy of a particular analysis, samples are spiked with a known concentration of the analyte of concern and analyzed as MS/matrix spike duplicate (MSD) samples. The RPD between the MS and MSD is used to assess analytical precision.

If only the MS or MSD recovery was outside of control limits, no qualification of the data was performed based on the acceptable recovery of the companion spike and the acceptable RPD.

MS/MSD analyses were performed as specified in Table 1.

The MS/MSD samples were spiked with the analytes of interest, and the results were evaluated per the "Guidelines" using the laboratory control limits. Most percent recoveries and RPD values were within the control limits or met the above criterion, demonstrating acceptable analytical accuracy and precision. Table 5 presents the sample results that were qualified due to low MS/MSD recoveries.

6. Duplicate Sample Analyses

Analytical precision is evaluated based on the analysis of laboratory duplicate samples. For this study, duplicate samples were prepared and analyzed by the laboratory for pH analyses as specified in Table 1. The duplicate results were evaluated per the "Guidelines" using the laboratory control limits.

All duplicate analyses performed met the above criteria demonstrating acceptable analytical precision.

7. Field QA/QC Samples

The field QA/QC consisted of one field duplicate sample set.

To assess the analytical and sampling protocol precision, one field duplicate sample set was collected and submitted "blind" to the laboratory, as specified in Table 1. The RPDs associated with these duplicate samples must be less than 50 percent for water samples. If the reported concentration in either the investigative sample or its duplicate is less than five times the reporting limit (RL), the evaluation criterion is one times the RL value.

All field duplicate results met the above criteria demonstrating acceptable sampling and analytical precision.

8. Analyte Reporting

The laboratory reported detected results down to the laboratory's sample-specific method detection limit (MDL) for each analyte. No positive analyte detections less than the RL but greater than the sample-specific MDL were reported. Non-detect results were presented as non-detect at the RL in Table 2.

9. Conclusion

Based on the assessment detailed in the foregoing, the data summarized in Table 2 are acceptable with the specific qualifications noted herein.

Regards,



Julie Lundie
Chemistry Data Validator/Analytical Coordinator

Table 1

Sample Collection and Analysis Summary
2025 Annual Groundwater Sampling for pH and Ammonia
Racer Nodular
Saginaw, Michigan
December 2025

Sample Identification	Location	Matrix	Collection Date (mm/dd/yyyy)	Collection Time (hr:min)	<u>Analysis/Parameters</u>		Comments
					Ammonia-N	pH, lab	
GW-11208041-121625-BW-003	MW-8R	Groundwater	12/16/2025	11:58	X	X	
GW-11208041-121825-BW-008	MW-03945	Groundwater	12/18/2025	11:20	X	X	
GW-11208041-121825-BW-009	MW-04051	Groundwater	12/18/2025	12:39	X	X	MS/MSD
GW-11208041-121625-BW-001	MW-04250R	Groundwater	12/16/2025	09:57	X	X	
GW-11208041-121625-BW-002	MW-04250R	Groundwater	12/16/2025	10:00	X	X	FD(GW-11208041-121625-BW-001)
GW-11208041-121825-BW-007	MW-04336	Groundwater	12/18/2025	10:07	X	X	
GW-11208041-121625-BW-005	MW-04438R	Groundwater	12/16/2025	14:23	X	X	
GW-11208041-121825-BW-006	MW-05036R	Groundwater	12/18/2025	09:08	X	X	MS/MSD; DUP
GW-11208041-121625-BW-004	MW-05038	Groundwater	12/16/2025	13:10	X	X	

Notes:

N - Nitrogen

MS/MSD- Matrix Spike/Matrix Spike Duplicate

FD - Field Duplicate sample of sample in parenthesis

DUP - Duplicate

Table 2
Analytical Results Summary
2025 Annual Groundwater Sampling for pH and Ammonia
Racer Nodular
Saginaw, Michigan
December 2025

Location ID:		MW-8R	MW-03945	MW-04051	MW-04250R	MW-04250R
Sample Name:		GW-11208041-121625-BW-003	GW-11208041-121825-BW-008	GW-11208041-121825-BW-009	GW-11208041-121625-BW-001	GW-11208041-121625-BW-002
Sample Date:		12/16/2025	12/18/2025	12/18/2025	12/16/2025	12/16/2025
						Duplicate
Parameters	Unit					
General Chemistry						
Ammonia-N	mg/L	3.8	8.7	6.8	3.2	3.2
pH, lab	s.u.	10.9 J	6.8 J	7.1 J	8.4 J	8.5 J

Table 2
Analytical Results Summary
2025 Annual Groundwater Sampling for pH and Ammonia
Racer Nodular
Saginaw, Michigan
December 2025

Location ID:		MW-04336	MW-04438R	MW-05036R	MW-05038
Sample Name:		GW-11208041-121825-BW-007	GW-11208041-121625-BW-005	GW-11208041-121825-BW-006	GW-11208041-121625-BW-004
Sample Date:		12/18/2025	12/16/2025	12/18/2025	12/16/2025
Parameters	Unit				
General Chemistry					
Ammonia-N	mg/L	4.5	0.20 U	14 J-	3.6
pH, lab	s.u.	7.2 J	7.9 J	10.9 J	3.7 J

Notes:

J - Estimated concentration

J- - Estimated concentration; implied low bias

N - Nitrogen

s.u. - Standard Units

Table 3

Analytical Methods
2025 Annual Groundwater Sampling for pH and Ammonia
Racer Nodular
Saginaw, Michigan
December 2025

Parameter	Method	Matrix	Preservation	Holding Time
				Collection or Extraction to Analysis (Days)
Ammonia-N	SM 4500-NH3H	Water	Iced, 0-6° C	28
pH	SW-846 9040/SM 4500 H+ B	Water	Iced, 0-6° C	15 minutes

Method References:

- SW-846 - "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods",
SW-846, Third Edition, 1986, with subsequent revisions
- SM - "Standard Methods for the Examination of Water and Wastewater", 18th Edition, 1992, with subsequent revisions.

Table 4

Qualified Sample Results Due to Holding Time Exceedance
2025 Annual Groundwater Sampling for pH and Ammonia
Racer Nodular
Saginaw, Michigan
December 2025

Parameter	Sample ID	Holding Time Time (days)	Holding Time Criteria (minutes)	Analyte	Qualified Sample Results	Units
General Chemistry	GW-11208041-121625-BW-001	6	<15	pH, lab	8.4 J	s.u.
	GW-11208041-121625-BW-002	6			8.5 J	s.u.
	GW-11208041-121625-BW-003	6			10.9 J	s.u.
	GW-11208041-121625-BW-004	6			3.7 J	s.u.
	GW-11208041-121625-BW-005	6			7.9 J	s.u.
	GW-11208041-121825-BW-006	4			10.9 J	s.u.
	GW-11208041-121825-BW-007	4			7.2 J	s.u.
	GW-11208041-121825-BW-008	4			6.8 J	s.u.
	GW-11208041-121825-BW-009	4			7.1 J	s.u.

Notes:

J - Estimated concentration

s.u. - Standard Units

Table 5

Qualified Sample Results Due to Outlying MS/MSD Results
2025 Annual Groundwater Sampling for pH and Ammonia
Racer Nodular
Saginaw, Michigan
December 2025

Parameter	Sample ID	Analyte	MS	MSD	RPD	Control Limits		Qualified Result	Units
			% Recovery	% Recovery	(percent)	% Recovery	RPD		
General Chemistry	GW-11208041-121825-BW-006	Ammonia-N	83	82	1	90-110	20	14 J-	mg/L

Notes:

- MS - Matrix Spike
- MSD - Matrix Spike Duplicate
- RPD - Relative Percent Difference
- J- - Estimated concentration; implied low bias
- N - Nitrogen

ANALYTICAL REPORT

PREPARED FOR

Attn: Julie Lundie
GHD Services Inc
2055 Niagara Falls Blvd
Suite 1

Niagara Falls, New York 14304

Generated 12/30/2025 2:13:15 PM

JOB DESCRIPTION

11208041, RACER Nodular Iron

JOB NUMBER

240-240528-1

Eurofins Cleveland

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 North Central, LLC Project Manager.

Authorization



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Authorized for release by
Denise Heckler, Project Manager II
Denise.Heckler@et.eurofinsus.com
(330)966-9477

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Definitions/Glossary

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

Qualifiers

General Chemistry

Qualifier	Qualifier Description
F1	MS and/or MSD recovery exceeds control limits.
HF	Parameter with a holding time of 15 minutes. Test performed by laboratory at client's request. Sample was analyzed outside of hold time.
U	Indicates the analyte was analyzed for but not detected.

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

Case Narrative

Client: GHD Services Inc
Project: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

Job ID: 240-240528-1

Eurofins Cleveland

Job Narrative 240-240528-1

Receipt

The samples were received on 12/19/2025 12:40 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 was 4.4° C.

General Chemistry

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

Eurofins Cleveland

Method Summary

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

Method	Method Description	Protocol	Laboratory
4500-NH3H-2021	Ammonia	SM	EET CLE
9040C	pH	SW846	EET CLE

Protocol References:

SM = "Standard Methods For The Examination Of Water And Wastewater"

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

EET CLE = Eurofins Cleveland, 180 S. Van Buren Avenue, Barberton, OH 44203, TEL (330)497-9396

Sample Summary

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received	Sample Origin
240-240528-1	GW-11208041-121625-BW-001	Water	12/16/25 09:57	12/19/25 12:40	Michigan
240-240528-2	GW-11208041-121625-BW-002	Water	12/16/25 10:00	12/19/25 12:40	Michigan
240-240528-3	GW-11208041-121625-BW-003	Water	12/16/25 11:58	12/19/25 12:40	Michigan
240-240528-4	GW-11208041-121625-BW-004	Water	12/16/25 13:10	12/19/25 12:40	Michigan
240-240528-5	GW-11208041-121625-BW-005	Water	12/16/25 14:23	12/19/25 12:40	Michigan
240-240528-6	GW-11208041-121825-BW-006	Water	12/18/25 09:08	12/19/25 12:40	Michigan
240-240528-7	GW-11208041-121825-BW-007	Water	12/18/25 10:07	12/19/25 12:40	Michigan
240-240528-8	GW-11208041-121825-BW-008	Water	12/18/25 11:20	12/19/25 12:40	Michigan
240-240528-9	GW-11208041-121825-BW-009	Water	12/18/25 12:39	12/19/25 12:40	Michigan

Detection Summary

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

Client Sample ID: GW-11208041-121625-BW-001

Lab Sample ID: 240-240528-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil	Fac	D	Method	Prep Type
Ammonia	3.2		0.20	0.15	mg/L	1			4500-NH3H-202	Total/NA
pH	8.4	HF	0.1	0.1	SU	1			9040C	Total/NA

Client Sample ID: GW-11208041-121625-BW-002

Lab Sample ID: 240-240528-2

Analyte	Result	Qualifier	RL	MDL	Unit	Dil	Fac	D	Method	Prep Type
Ammonia	3.2		0.20	0.15	mg/L	1			4500-NH3H-202	Total/NA
pH	8.5	HF	0.1	0.1	SU	1			9040C	Total/NA

Client Sample ID: GW-11208041-121625-BW-003

Lab Sample ID: 240-240528-3

Analyte	Result	Qualifier	RL	MDL	Unit	Dil	Fac	D	Method	Prep Type
Ammonia	3.8		0.20	0.15	mg/L	1			4500-NH3H-202	Total/NA
pH	10.9	HF	0.1	0.1	SU	1			9040C	Total/NA

Client Sample ID: GW-11208041-121625-BW-004

Lab Sample ID: 240-240528-4

Analyte	Result	Qualifier	RL	MDL	Unit	Dil	Fac	D	Method	Prep Type
Ammonia	3.6		0.20	0.15	mg/L	1			4500-NH3H-202	Total/NA
pH	3.7	HF	0.1	0.1	SU	1			9040C	Total/NA

Client Sample ID: GW-11208041-121625-BW-005

Lab Sample ID: 240-240528-5

Analyte	Result	Qualifier	RL	MDL	Unit	Dil	Fac	D	Method	Prep Type
pH	7.9	HF	0.1	0.1	SU	1			9040C	Total/NA

Client Sample ID: GW-11208041-121825-BW-006

Lab Sample ID: 240-240528-6

Analyte	Result	Qualifier	RL	MDL	Unit	Dil	Fac	D	Method	Prep Type
Ammonia	14	F1	0.40	0.29	mg/L	2			4500-NH3H-202	Total/NA
pH	10.9	HF	0.1	0.1	SU	1			9040C	Total/NA

Client Sample ID: GW-11208041-121825-BW-007

Lab Sample ID: 240-240528-7

Analyte	Result	Qualifier	RL	MDL	Unit	Dil	Fac	D	Method	Prep Type
Ammonia	4.5		0.20	0.15	mg/L	1			4500-NH3H-202	Total/NA
pH	7.2	HF	0.1	0.1	SU	1			9040C	Total/NA

Client Sample ID: GW-11208041-121825-BW-008

Lab Sample ID: 240-240528-8

Analyte	Result	Qualifier	RL	MDL	Unit	Dil	Fac	D	Method	Prep Type
Ammonia	8.7		0.20	0.15	mg/L	1			4500-NH3H-202	Total/NA
pH	6.8	HF	0.1	0.1	SU	1			9040C	Total/NA

Client Sample ID: GW-11208041-121825-BW-009

Lab Sample ID: 240-240528-9

Analyte	Result	Qualifier	RL	MDL	Unit	Dil	Fac	D	Method	Prep Type
Ammonia	6.8	F1	0.20	0.15	mg/L	1			4500-NH3H-202	Total/NA
pH	7.1	HF	0.1	0.1	SU	1			9040C	Total/NA

This Detection Summary does not include radiochemical test results.

Eurofins Cleveland

Client Sample Results

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

General Chemistry

Client Sample ID: GW-11208041-121625-BW-001

Date Collected: 12/16/25 09:57

Date Received: 12/19/25 12:40

Lab Sample ID: 240-240528-1

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia (SM 4500-NH3H-2021)	3.2		0.20	0.15	mg/L			12/29/25 18:17	1
pH (SW846 9040C)	8.4	HF	0.1	0.1	SU			12/22/25 14:06	1

Client Sample ID: GW-11208041-121625-BW-002

Date Collected: 12/16/25 10:00

Date Received: 12/19/25 12:40

Lab Sample ID: 240-240528-2

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia (SM 4500-NH3H-2021)	3.2		0.20	0.15	mg/L			12/29/25 18:20	1
pH (SW846 9040C)	8.5	HF	0.1	0.1	SU			12/22/25 14:21	1

Client Sample ID: GW-11208041-121625-BW-003

Date Collected: 12/16/25 11:58

Date Received: 12/19/25 12:40

Lab Sample ID: 240-240528-3

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia (SM 4500-NH3H-2021)	3.8		0.20	0.15	mg/L			12/29/25 18:23	1
pH (SW846 9040C)	10.9	HF	0.1	0.1	SU			12/22/25 14:26	1

Client Sample ID: GW-11208041-121625-BW-004

Date Collected: 12/16/25 13:10

Date Received: 12/19/25 12:40

Lab Sample ID: 240-240528-4

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia (SM 4500-NH3H-2021)	3.6		0.20	0.15	mg/L			12/29/25 18:26	1
pH (SW846 9040C)	3.7	HF	0.1	0.1	SU			12/22/25 14:31	1

Client Sample ID: GW-11208041-121625-BW-005

Date Collected: 12/16/25 14:23

Date Received: 12/19/25 12:40

Lab Sample ID: 240-240528-5

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia (SM 4500-NH3H-2021)	0.20	U	0.20	0.15	mg/L			12/29/25 18:29	1
pH (SW846 9040C)	7.9	HF	0.1	0.1	SU			12/22/25 14:36	1

Client Sample ID: GW-11208041-121825-BW-006

Date Collected: 12/18/25 09:08

Date Received: 12/19/25 12:40

Lab Sample ID: 240-240528-6

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia (SM 4500-NH3H-2021)	14	F1	0.40	0.29	mg/L			12/30/25 11:30	2
pH (SW846 9040C)	10.9	HF	0.1	0.1	SU			12/22/25 13:25	1

Client Sample ID: GW-11208041-121825-BW-007

Date Collected: 12/18/25 10:07

Date Received: 12/19/25 12:40

Lab Sample ID: 240-240528-7

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia (SM 4500-NH3H-2021)	4.5		0.20	0.15	mg/L			12/29/25 18:11	1
pH (SW846 9040C)	7.2	HF	0.1	0.1	SU			12/22/25 14:42	1

Client Sample ID: GW-11208041-121825-BW-008

Date Collected: 12/18/25 11:20

Date Received: 12/19/25 12:40

Lab Sample ID: 240-240528-8

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia (SM 4500-NH3H-2021)	8.7		0.20	0.15	mg/L			12/29/25 18:14	1
pH (SW846 9040C)	6.8	HF	0.1	0.1	SU			12/22/25 14:57	1

Eurofins Cleveland

Client Sample Results

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

General Chemistry

Client Sample ID: GW-11208041-121825-BW-009						Lab Sample ID: 240-240528-9			
Date Collected: 12/18/25 12:39						Matrix: Water			
Date Received: 12/19/25 12:40									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia (SM 4500-NH3H-2021)	6.8	F1	0.20	0.15	mg/L			12/29/25 17:56	1
pH (SW846 9040C)	7.1	HF	0.1	0.1	SU			12/22/25 15:52	1

QC Sample Results

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

Method: 4500-NH3H-2021 - Ammonia

Lab Sample ID: MB 240-685997/78

Matrix: Water

Analysis Batch: 685997

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia	0.20	U	0.20	0.15	mg/L			12/29/25 17:08	1

Lab Sample ID: LCS 240-685997/79

Matrix: Water

Analysis Batch: 685997

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Ammonia	8.55	8.35		mg/L		98	90 - 110

Lab Sample ID: 240-240528-9 MS

Matrix: Water

Analysis Batch: 685997

Client Sample ID: GW-11208041-121825-BW-009

Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
Ammonia	6.8	F1	2.50	9.73	F1	mg/L		115	90 - 110

Lab Sample ID: 240-240528-9 MSD

Matrix: Water

Analysis Batch: 685997

Client Sample ID: GW-11208041-121825-BW-009

Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Ammonia	6.8	F1	2.50	9.13		mg/L		91	90 - 110	6	20

Lab Sample ID: MB 240-686098/14

Matrix: Water

Analysis Batch: 686098

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia	0.20	U	0.20	0.15	mg/L			12/30/25 10:36	1

Lab Sample ID: LCS 240-686098/15

Matrix: Water

Analysis Batch: 686098

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Ammonia	8.55	8.26		mg/L		97	90 - 110

Lab Sample ID: 240-240528-6 MS

Matrix: Water

Analysis Batch: 686098

Client Sample ID: GW-11208041-121825-BW-006

Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
Ammonia	14	F1	5.00	18.6	F1	mg/L		83	90 - 110

Lab Sample ID: 240-240528-6 MSD

Matrix: Water

Analysis Batch: 686098

Client Sample ID: GW-11208041-121825-BW-006

Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Ammonia	14	F1	5.00	18.6	F1	mg/L		82	90 - 110	0	20

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QC Sample Results

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

Method: 9040C - pH

Lab Sample ID: LCS 240-685433/2

Matrix: Water

Analysis Batch: 685433

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
pH	7.52	7.4		SU		99	97 - 103

Lab Sample ID: LCS 240-685433/22

Matrix: Water

Analysis Batch: 685433

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
pH	7.52	7.6		SU		101	97 - 103

Lab Sample ID: LCS 240-685484/2

Matrix: Water

Analysis Batch: 685484

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
pH	7.52	7.5		SU		100	97 - 103

Lab Sample ID: 240-240528-6 DU

Matrix: Water

Analysis Batch: 685484

Client Sample ID: GW-11208041-121825-BW-006

Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	RPD Limit
pH	10.9	HF	11.0		SU		0.3	20

QC Association Summary

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

General Chemistry

Analysis Batch: 685433

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-240528-1	GW-11208041-121625-BW-001	Total/NA	Water	9040C	
240-240528-2	GW-11208041-121625-BW-002	Total/NA	Water	9040C	
240-240528-3	GW-11208041-121625-BW-003	Total/NA	Water	9040C	
240-240528-4	GW-11208041-121625-BW-004	Total/NA	Water	9040C	
240-240528-5	GW-11208041-121625-BW-005	Total/NA	Water	9040C	
240-240528-7	GW-11208041-121825-BW-007	Total/NA	Water	9040C	
240-240528-8	GW-11208041-121825-BW-008	Total/NA	Water	9040C	
LCS 240-685433/2	Lab Control Sample	Total/NA	Water	9040C	
LCS 240-685433/22	Lab Control Sample	Total/NA	Water	9040C	

Analysis Batch: 685484

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-240528-6	GW-11208041-121825-BW-006	Total/NA	Water	9040C	
240-240528-9	GW-11208041-121825-BW-009	Total/NA	Water	9040C	
LCS 240-685484/2	Lab Control Sample	Total/NA	Water	9040C	
240-240528-6 DU	GW-11208041-121825-BW-006	Total/NA	Water	9040C	

Analysis Batch: 685997

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-240528-1	GW-11208041-121625-BW-001	Total/NA	Water	4500-NH3H-202	
				1	
240-240528-2	GW-11208041-121625-BW-002	Total/NA	Water	4500-NH3H-202	
				1	
240-240528-3	GW-11208041-121625-BW-003	Total/NA	Water	4500-NH3H-202	
				1	
240-240528-4	GW-11208041-121625-BW-004	Total/NA	Water	4500-NH3H-202	
				1	
240-240528-5	GW-11208041-121625-BW-005	Total/NA	Water	4500-NH3H-202	
				1	
240-240528-7	GW-11208041-121825-BW-007	Total/NA	Water	4500-NH3H-202	
				1	
240-240528-8	GW-11208041-121825-BW-008	Total/NA	Water	4500-NH3H-202	
				1	
240-240528-9	GW-11208041-121825-BW-009	Total/NA	Water	4500-NH3H-202	
				1	
MB 240-685997/78	Method Blank	Total/NA	Water	4500-NH3H-202	
				1	
LCS 240-685997/79	Lab Control Sample	Total/NA	Water	4500-NH3H-202	
				1	
240-240528-9 MS	GW-11208041-121825-BW-009	Total/NA	Water	4500-NH3H-202	
				1	
240-240528-9 MSD	GW-11208041-121825-BW-009	Total/NA	Water	4500-NH3H-202	
				1	

Analysis Batch: 686098

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-240528-6	GW-11208041-121825-BW-006	Total/NA	Water	4500-NH3H-202	
				1	
MB 240-686098/14	Method Blank	Total/NA	Water	4500-NH3H-202	
				1	
LCS 240-686098/15	Lab Control Sample	Total/NA	Water	4500-NH3H-202	
				1	
240-240528-6 MS	GW-11208041-121825-BW-006	Total/NA	Water	4500-NH3H-202	
				1	

Eurofins Cleveland

QC Association Summary

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

General Chemistry (Continued)

Analysis Batch: 686098 (Continued)

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-240528-6 MSD	GW-11208041-121825-BW-006	Total/NA	Water	4500-NH3H-202 1	

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13

Lab Chronicle

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

Client Sample ID: GW-11208041-121625-BW-001

Lab Sample ID: 240-240528-1

Date Collected: 12/16/25 09:57

Matrix: Water

Date Received: 12/19/25 12:40

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	4500-NH3H-2021		1	685997	SC3B	EET CLE	12/29/25 18:17
Total/NA	Analysis	9040C		1	685433	PQD2	EET CLE	12/22/25 14:06

Client Sample ID: GW-11208041-121625-BW-002

Lab Sample ID: 240-240528-2

Date Collected: 12/16/25 10:00

Matrix: Water

Date Received: 12/19/25 12:40

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	4500-NH3H-2021		1	685997	SC3B	EET CLE	12/29/25 18:20
Total/NA	Analysis	9040C		1	685433	PQD2	EET CLE	12/22/25 14:21

Client Sample ID: GW-11208041-121625-BW-003

Lab Sample ID: 240-240528-3

Date Collected: 12/16/25 11:58

Matrix: Water

Date Received: 12/19/25 12:40

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	4500-NH3H-2021		1	685997	SC3B	EET CLE	12/29/25 18:23
Total/NA	Analysis	9040C		1	685433	PQD2	EET CLE	12/22/25 14:26

Client Sample ID: GW-11208041-121625-BW-004

Lab Sample ID: 240-240528-4

Date Collected: 12/16/25 13:10

Matrix: Water

Date Received: 12/19/25 12:40

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	4500-NH3H-2021		1	685997	SC3B	EET CLE	12/29/25 18:26
Total/NA	Analysis	9040C		1	685433	PQD2	EET CLE	12/22/25 14:31

Client Sample ID: GW-11208041-121625-BW-005

Lab Sample ID: 240-240528-5

Date Collected: 12/16/25 14:23

Matrix: Water

Date Received: 12/19/25 12:40

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	4500-NH3H-2021		1	685997	SC3B	EET CLE	12/29/25 18:29
Total/NA	Analysis	9040C		1	685433	PQD2	EET CLE	12/22/25 14:36

Client Sample ID: GW-11208041-121825-BW-006

Lab Sample ID: 240-240528-6

Date Collected: 12/18/25 09:08

Matrix: Water

Date Received: 12/19/25 12:40

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	4500-NH3H-2021		2	686098	AJ	EET CLE	12/30/25 11:30
Total/NA	Analysis	9040C		1	685484	PQD2	EET CLE	12/22/25 13:25

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Lab Chronicle

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

Client Sample ID: GW-11208041-121825-BW-007

Lab Sample ID: 240-240528-7

Date Collected: 12/18/25 10:07

Matrix: Water

Date Received: 12/19/25 12:40

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	4500-NH3H-2021		1	685997	SC3B	EET CLE	12/29/25 18:11
Total/NA	Analysis	9040C		1	685433	PQD2	EET CLE	12/22/25 14:42

Client Sample ID: GW-11208041-121825-BW-008

Lab Sample ID: 240-240528-8

Date Collected: 12/18/25 11:20

Matrix: Water

Date Received: 12/19/25 12:40

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	4500-NH3H-2021		1	685997	SC3B	EET CLE	12/29/25 18:14
Total/NA	Analysis	9040C		1	685433	PQD2	EET CLE	12/22/25 14:57

Client Sample ID: GW-11208041-121825-BW-009

Lab Sample ID: 240-240528-9

Date Collected: 12/18/25 12:39

Matrix: Water

Date Received: 12/19/25 12:40

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	4500-NH3H-2021		1	685997	SC3B	EET CLE	12/29/25 17:56
Total/NA	Analysis	9040C		1	685484	PQD2	EET CLE	12/22/25 15:52

Laboratory References:

EET CLE = Eurofins Cleveland, 180 S. Van Buren Avenue, Barberton, OH 44203, TEL (330)497-9396

Accreditation/Certification Summary

Client: GHD Services Inc
Project/Site: 11208041, RACER Nodular Iron

Job ID: 240-240528-1

Laboratory: Eurofins Cleveland

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-0806	09-30-26
Georgia	State	4062	02-27-26
Illinois	NELAP	200004	08-31-26
Iowa	State	421	06-01-27
Kansas	NELAP	E-10336	01-31-26
Kentucky (UST)	State	112225	02-27-26
Kentucky (WW)	State	KY98016	12-31-25
Minnesota	NELAP	039-999-348	12-31-25
New Hampshire	NELAP	2250	09-30-26
New Jersey	NELAP	OH001	06-30-26
New York	NELAP	10975	04-01-26
North Dakota	State	R-244	02-27-26
Ohio	State	8303	02-27-26
Ohio VAP	State	ORELAP 4062	02-27-26
Oregon	NELAP	4062	02-27-26
Pennsylvania	NELAP	68-00340	08-31-26
Texas	NELAP	T104704517	08-31-26
US Fish & Wildlife	US Federal Programs	A26406	02-28-26
USDA	US Federal Programs	525-24-5-34740	01-05-27
Virginia	NELAP	460175	09-30-26
West Virginia DEP	State	210	12-31-25
Wisconsin	State	399167560	08-31-26

$$\frac{3.7}{4.4}$$

Environment: Testing



240-240528 COC

Eurofins - Cleveland Sample Receipt Form/Narrative		Client <u>GH</u>	Site Name _____	Cooler unpacked by <u>JM</u>
Barberton Facility		Cooler Received on <u>12/14/25</u>	Opened on <u>12/20/25</u>	
FedEx: 1st Grd <u>Exp</u>		UPS <u>FAS</u>	Waypoint _____	Eurofins Courier _____
Receipt After-hours _____		Drop-off Date/Time _____	Storage Location _____	Other _____
Eurofins Cooler # <u>EC</u> Foam Box _____ Client Cooler <u>Box</u> Other _____ Packing material used. Bubble Wrap _____ Foam <u>Plastic Bag</u> None _____ Other _____ COOLANT: <u>MetIce</u> Blue Ice _____ Dry Ice _____ Water _____ None _____ 1 Cooler temperature upon receipt ☐ See Multiple Cooler Form				
2. Were tamper/custody seals on the outside of the cooler(s)? If Yes Quantity <u>1</u> Yes ☒ No ☐ -Were the seals on the outside of the cooler(s) signed & dated? Yes ☒ No ☐ NA ☐ -Were tamper/custody seals on the bottle(s) or bottle kits (LLHg/MetHg)? Yes ☒ No ☐ NA ☐ -Were tamper/custody seals intact and uncompromised? Yes ☒ No ☐ NA ☐ 3 Shippers' packing slip attached to the cooler(s)? Yes ☒ No ☐ NA ☐ 4 Did custody papers accompany the sample(s)? Yes ☒ No ☐ NA ☐ 5 Were the custody papers relinquished & signed in the appropriate place? Yes ☒ No ☐ NA ☐ 6 Was/were the person(s) who collected the samples clearly identified on the COC? Yes ☒ No ☐ NA ☐ 7 Did all bottles arrive in good condition (Unbroken)? Yes ☒ No ☐ NA ☐ 8 Could all bottle labels (ID/Date/Time) be reconciled with the COC? Yes ☒ No ☐ NA ☐ 9 For each sample, does the COC specify preservatives (Y/N), # of containers (Y/N), and sample type of grab/comp (Y/N)? Yes ☒ No ☐ NA ☐ 10 Were correct bottle(s) used for the test(s) indicated? Yes ☒ No ☐ NA ☐ 11 Sufficient quantity received to perform indicated analyses? Yes ☒ No ☐ NA ☐ 12. Are these work share samples and all listed on the COC? Yes ☒ No ☐ NA ☐ If yes, Questions 13-17 have been checked at the originating laboratory 13 Were all preserved sample(s) at the correct pH upon receipt? Yes ☒ No ☐ NA ☐ pH Strip Lot# HC567196 14 Were VOAs on the COC? Yes ☒ No ☐ NA ☐ 15 Were air bubbles >6 mm in any VOA vials? Yes ☒ No ☐ NA ☐ Larger than this. 16 Was a VOA trip blank present in the cooler(s)? Trip Blank Lot # _____ Yes ☒ No ☐ NA ☐ 17 Was a L/L Hg or Me Hg trip blank present? Yes ☒ No ☐ NA ☐				
Contacted PM _____ Date _____ by _____ via Verbal Voice Mail Other _____ Concerning _____				
18. CHAIN OF CUSTODY & SAMPLE DISCREPANCIES ☐ additional next page		Labeled by _____		
		Labels Verified by _____		
19 SAMPLE CONDITION Sample(s) _____ were received after the recommended holding time had expired Sample(s) _____ were received in a broken container Sample(s) _____ were received with bubble >6 mm in diameter (Notify PM)				
20. SAMPLE PRESERVATION				
Sample(s) _____ were further preserved in the laboratory Time preserved _____ Preservative(s) added/Lot number(s) _____ VOA Sample Preservation - Date/Time VOAs Frozen _____				

12/30/2025

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