



Ciner Wyoming LLC

254 County Road 4-6
P.O. Box 513
Green River, WY 82935
Phone: 307-872-7150

August 23, 2021

U.S. Environmental Protection Agency
Attn: Colleen Rathbone, Chief Water Enforcement Branch
Enforcement and Compliance Assurance Division
1595 Wynkoop Street
Denver, CO 80202
Detty.joan@epa.gov

Re: Response to Administrative Order issued to Ciner Wyoming LLC regarding Ciner Wyoming LLC Public Water System, PWS ID #WY5600634

Dear Ms. Rathbone,

Thank you for the opportunity to respond to and provide information regarding the above referenced Administrative Order (“Order”). Ciner Wyoming LLC (“Ciner”) received the Order on August 9, 2021, via e-mail, and is hereby submitting this response within 10 business days of receipt of the Order as requested in the accompanying cover letter. Ciner understands the importance of maintaining a safe public drinking water system, and as the information provided below demonstrates, has implemented procedures to prevent non-compliance events from happening in the future.

Total Organic Carbon (“TOC”)

As the Order states, a reduction of TOC between the system’s source water and combined filter effluent at a ratio of 1.00 or above is required. Ciner’s most recent test results for the second quarter of 2021 demonstrate that the drinking water system is currently above the required ratio for its running annual average (“RAA”) and is in compliance with the requirements of 40 C.F.R. § 141.135(b)(2). The test results and correspondence sent to EPA, confirming compliance with an RAA ratio above 1.00, is attached hereto as Exhibit A. These results, which show a steady increase in the TOC ratio through the second quarter of 2021, demonstrate the success of the efforts Ciner has taken to improve the operations of the treatment process, including:

- Replacement of filter media in both of the domestic water filters.
- Cleaned, inspected, and made minor repairs on two of the three clarifiers.
- Obtained a mud sampler tool to allow operators to sample clarifier mud beds.
- Replacement of filter media in three of the nine parallel sand media filters.
- Obtained TOC sampling equipment and a jar testing set to periodically test turbidity and TOCs.



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- Performed an audit on the drinking water system and sought information on the best practices to implement for the treatment system.
- Consulted with Wyoming Association of Rural Water Systems for a site visit and review of our domestic water system.

Ciner will continue these efforts to ensure its drinking water system remains in compliance with the Safe Drinking Water Act Act (“SDWA” or “Act”).

Reporting and Public Notice for TOC Compliance Events

Ciner has reviewed the information in the Order regarding the notification provided and understands the importance of public notifications for drinking water system violations and did provide notifications to the public when it was made aware of instances of non-compliance. Copies of the public notifications Ciner posted are attached hereto as Exhibit B. Each of these public notices was also provided to the EPA, as evidenced in the e-mail correspondence also included in Exhibit B. Because Ciner’s RAA for its TOC ratio is currently above 1.00, no additional public notices are required to be published at this time.

However, to ensure that public notifications are in compliance with the SDWA requirements, if there is a future event requiring such notification, Ciner is undertaking a comprehensive training program for employees within its environmental department on these requirements. This training will specifically include information on all of the requirements for Tier 2 public notices, including the timing requirement that notices are posted within 30 days of receipt of the quarterly test results from the prior 12-month period and ensuring a copy of the notice is provided to the EPA within 10 days of such posting.

Nephelometric Turbidity Unit (“NTU”)

Ciner’s water system is required to maintain an NTU of 1 or less at all times as required by 40 C.F.R. § 141.551(b)(1). On January 11, 2018, Ciner’s source water intake was impacted by an ice buildup event, which resulted in clarifier issues in the water system. The clarifier issues caused several hours of high turbidity domestic water to be produced within the Ciner water system. Applicable emergency procedures were followed, and the employees and contractors were told not to drink the water until the system was restored and back under the NTU limit. A timely public notice was issued, as required, a copy of the public notice certification is attached here as Exhibit C. The water system was brought back into compliance within 24 hours of the ice buildup incident.

On the same day that Ciner experienced the ice buildup that caused the NTU exceedance event, Tyler Schiltz, Ciner’s Environmental Superintendent, reported the incident to the EPA Surface Water Treatment Rule manager via e-mail. A copy of this e-mail correspondence is

Ciner Wyoming LLC



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attached hereto as Exhibit D. The Order indicates in paragraph 10 that Ciner failed to comply with the 48-hour reporting requirements with respect to the NTU event because it did not report the incident to the EPA. However, the e-mail correspondence attached as Exhibit D demonstrates that the notification requirements in 40 C.F.R. § 141.31(b) were satisfied.

Ciner actively monitors its source water intake structure to identify any potential interference, such as ice buildup or other malfunction. Monitoring is conducted once per operational shift. This monitoring allowed the facility to act swiftly to remedy the NTU exceedance, and the system is currently in compliance with all NTU requirements.

Closing

As noted above, Ciner takes safety of its drinking water supply very seriously and has taken concerted steps to further improve its processes over the last several years. Accordingly, Ciner is pleased to report that as of June 1, 2021, its public drinking water system is in compliance with all applicable requirements of the Act and Part 141, as required by ¶ 11 of the Order; has achieved a TOC removal ratio greater than 1.00, as required by ¶ 12 of the Order; and is not exceeding 1 NTU, as required by ¶ 13 of the Order. In addition, should any of the circumstances identified in ¶¶ 13 – 16 arise in the future, Ciner is committed to ensuring that the notification and reporting procedures outlined in those paragraphs will be followed. Ciner will also continue to implement the steps it has described in this letter to maintain its compliance with the SDWA and ensure the safety of its public drinking water supply. Please direct any questions regarding the information in this letter to Tyler Schiltz at tschiltz@ciner.us.com or at (307) 872-7150.

Sincerely,

Tyler Schiltz
Ciner Wyoming LLC
Environmental Superintendent

Ciner Wyoming LLC



254 County Road 4-6
P.O. Box 513
Green River, WY 82935
Phone: 307-872-7150

cc: WY DEQ/DOH (via email)
Sweetwater County Commissioners (westr@sweet.wy.us; shoemakers@sweet.wy.us)
Nathan Hicks, Water Security Enforcement Lead (Hicks.Nathaniel@epa.gov)
Melissa Haniewicz, EPA Regional Hearing Clerk (Haniewicz.Melissa@epa.gov)
Guray Eken, Site Manager (geken@ciner.us.com)
Eric Washington, Operator (ewashington@ciner.us.com)
Cynthia Grant, Alternate Operator (cgrant@ciner.us.com)
Hilary Huckfeldt, Principal Environmental Engineer (hhuckfeldt@ciner.us.com)
Kristina Barden, Environmental Specialist (kbarden@ciner.us.com)

Exhibit A

From: Schiltz, Tyler
Sent: Friday, July 2, 2021 11:47 AM
To: 'EPA Region 8 Drinking Water (r8dwu@epa.gov)'
Cc: Washington, Eric; Kizzire, Ron; Anderson, Kelly; Brown, Josh; Herbin, Jason; Zuehlsdorff, John; Grant, Cynthia; Frampton, Laura; Harmon, Jeremy; Walk, Mike; Froats, Jason; Williams, Virginia; Huckfeldt, Hilary; Spicer, Jeramy; Tardoni, James
Subject: WY5600634 TOC Q2 2021
Attachments: Q2 2021 Stage 1 TOCA RAA FORM 4.4.5.xls; 04_07_2021_B21040649.pdf; 05_03_2021_B21040649.pdf; 06_08_2021_B21060836.PDF

Good morning,

Please find the attached Q2 2021 TOC results and corresponding lab data.

Please let me know if you have any questions.

Tyler Schiltz E.I.T.

Environmental Superintendent



PO Box 513 | 254 County Road 4-6 | Green River, WY 82935

Phone: (307) 872-7150

Email: tschiltz@ciner.us.com

<https://www.linkedin.com/in/tyler-schiltz/>

Visit our website at www.ciner.us.com



US Environmental Protection Agency Region 8

Drinking Water Branch
1595 Wynkoop Street
Denver, CO 80202-1129

<https://www.epa.gov/region8-waterops>

Disinfectants/Disinfection Byproducts Rule (DBP) Precursors - Form 4.4.5

Stage 1 Total Organic Carbon Removal Ratios
Enhanced Coagulation and Softening Treatment Plants

PWS ID No.:	WY5600634 NTNC/SW	PLANT NAME:	Ciner Wyoming LLC
SYSTEM NAME:	Ciner Wyoming LLC	PREPARED BY:	Tyler Schiltz
PREPARED DATE:	July 2, 2021	TITLE:	Environmental Superintendent
Check One (Use X):	<input type="checkbox"/> 1st Quarter <input checked="" type="checkbox"/> 2nd Quarter <input type="checkbox"/> 3rd Quarter <input type="checkbox"/> 4th Quarter	**Note: Four Digits (YYYY). No spaces. Numbers only.	
Current Year	2021		
Report Due	July 10, 2021		

Reporting Quarters	Column A	Column B	Column C	Column D Source Water			Column E Treated Water		Column F Removal Performance	
	Month	Year	Plant Operating	Alkalinity mg/L	TOC mg/L	SUVA (Optional) L/mg-m	TOC mg/L	SUVA (Optional) L/mg-m	Actual TOC %	Compliance Ratio
	<i>1st Quarter</i>	January	2021	Yes	166	2.3		2		13.04%
	February	2021	Yes	165	2.6		2.3		11.54%	0.77
	March	2021	Yes	169	2.5		2		20.00%	1.33
<i>2nd Quarter</i>	April	2021	Yes	159	2.5		2		20.00%	1.33
	May	2021	Yes	162	3.6		2.3		36.11%	2.41
	June	2021	Yes	150	3.1		2.4		22.58%	1.51
<i>3rd Quarter</i>	July	2020	Yes	126	5.2		4.2		19.23%	0.77
	August	2020	Yes	125	4.9		3.9		20.41%	0.82
	September	2020	Yes	134	3.2		2.8		12.50%	0.83
<i>4th Quarter</i>	October	2020	Yes	140	3.4		3.1		8.82%	0.59
	November	2020	Yes	147	3.1		2.8		9.68%	0.65
	December	2020	Yes	166	2.8		2.5		10.71%	0.71

Running Annual Average (RAA) for your Compliance Removal Ratio 1.06

Form Check: Missing Treated Water TOC during month of Plant Operation above

Preparer's Notes:

Resources:				Table 2: Alternate Compliance Ratios for DBPs				Table 3: Specific Ultra Violet Absorbance (SUVA)		
Table 1: Actual TOC Removal Performance Requirements				Does your system use free chlorine?				Yes		
Source Water TOC, mg/L	Source Water Alkalinity, mg/L (as CaCO ₃)			Quarter	Year	Highest LRAA		SUVA Calculator		
	0-60	>60-120	>120			TTHM	HAA5	UV254	cm-1	
>2.0 - 4.0	35%	25%	15%	Quarter 1	2021	ug/L	ug/L	DOC	mg/L	
>4.0 - 8.0	45%	35%	25%	Quarter 2	2021	51.3	26.0	SUVA	L/mg-m	
>8.0	50%	40%	30%	Quarter 3	2020	54.5	27.3	$SUVA(L/mg - m) = \left(\frac{UV_{254}(cm^{-1})}{DOC(mg/L)} \right)^{100}$		
APPROVED STEP 2 WAIVER	Not Applicable			Quarter 4	2020	64.5	31.5			

INSTRUCTIONS FOR COMPLETING

- 1. PWS ID No.:** Enter the Public Water System (PWS) Identification Number assigned by USEPA.
- 2. System Name:** Enter system legal name provided to USEPA when PWS ID assigned.
- 3. Prepared Date:** Enter the date that the final report is prepared.
- 4. Plant Name:** Enter the name of the treatment plant. If the plant has no name, please enter "Water Treatment Plant"
- 5. Prepared by:** Enter the name of the person completing the form.
- 6. Title:** Enter the Title/position of individual submitting the document.
- 7. Check One Quarter:** Place an X in the space to the left of the current quarter. Only X must be entered on this line.
- 8. Current Year:** Enter the current for the report. This should be in a four digit (YYYY) format.
- 9. Report Due:** This will automatically display the due date. The report must be submitted to R8DWU@epa.gov with the PWS ID # and "TOCA" in the subject line.
- 10. Column A:** This column displays the months of the year. This column will not change.
- 11. Column B:** This column will automatically populate depending on the submittal quarter (Step 7) and the year entered in Step 8. If problems occur, repeat Steps 7-8.
- 12. Column C:** If any water was delivered to the distribution system **during any part of the month**, this must indicate "Yes." Otherwise, please indicate "No."
Use the failure to monitor (FTM) option, if the plant was running, but no approved samples were collected.
- 13. Column D:** Enter the Alkalinity, TOC, or optional SUVA for the source water. Source water sampling must be conducted before any treatment or chemicals are added to the water.
- 14. Column E:** Enter the TOC or optional SUVA for the finished treated water. Finished water sampling is located at or before the combined filter effluent turbidity monitoring location.
- 15. Column F:** This will automatically display the removal performance for each month. The RAA compliance ratio will be displayed at the bottom.
- 16. Form Check:** In filling out the spreadsheet, the notes section will display automatic notes for the preparer to check before submitting the spreadsheet.
- 17. Preparer's Notes:** (Optional) The preparer may add notes here for documentation purposes.
- 18. Table 1:** For reference only.
- 19. Table 2:** This is an alternate criteria. If the highest locational running annual average (LRAA) is less than 40 ppb for TTHMS and 30 ppb for HAA5s, the compliance ratio can be 1.0 for the quarter.
- 20. Table 3:** This is a calculator for your own use. SUVA is Specific Ultra Violet Absorbance. DOC is dissolved organic carbon. UV254 is a measure of light absorbed by organic matter.



ANALYTICAL SUMMARY REPORT

April 15, 2021

Ciner Wyoming LLC
PO Box 513
Green River, WY 82935-0513

Work Order: B21040649
Project Name: DBP Precursor WY5600634 NTNC

Energy Laboratories Inc Billings MT received the following 2 samples for Ciner Wyoming LLC on 4/8/2021 for analysis.

Lab ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
B21040649-001	RAWTOCA-RSP02	04/07/21 08:45	04/08/21	Drinking Water	Alkalinity Carbon, Total Organic
B21040649-002	FINTOC-RSP03	04/07/21 08:45	04/08/21	Drinking Water	Carbon, Total Organic

The analyses presented in this report were performed by Energy Laboratories, Inc., 1120 S 27th St., Billings, MT 59101, unless otherwise noted. Any exceptions or problems with the analyses are noted in the Laboratory Analytical Report, the QA/QC Summary Report, or the Case Narrative. Any issues encountered during sample receipt are documented in the Work Order Receipt Checklist.

The results as reported relate only to the item(s) submitted for testing. This report shall be used or copied only in its entirety. Energy Laboratories, Inc. is not responsible for the consequences arising from the use of a partial report.

If you have any questions regarding these test results, please contact your Project Manager.

Report Approved By:



CLIENT: Ciner Wyoming LLC
Project: DBP Precursor WY5600634 NTNC
Work Order: B21040649

Report Date: 04/15/21

CASE NARRATIVE

Tests associated with analyst identified as ELI-CA were subcontracted to Energy Laboratories, PO Box 247, Casper, WY, EPA Number WY00002.



LABORATORY ANALYTICAL REPORT

Prepared by Billings, MT Branch

Client: Ciner Wyoming LLC

Client Sample ID: RAWTOCA-RSP02

PWS #: WY5600634 **Name:** CINER WYOMING LLC

Facility ID: IN01

Sampling Point/Location: RAWTOCA / RAWTOCA-RSP02

Project ID: DBP Precursor WY5600634 NTNC

Collector's Name: Jack McCully

Contact Phone #: (307) 872-7207

Compliance Sample: YES

Sample Type: RT

Lab ID: B21040649-001

Report Date: 04/15/21

Collection Date: 04/07/21 08:45

Date Received: 04/08/21

Matrix: Drinking Water

Federal ID#: MT00005

FRDS Analyses	Result	Units	Qual	MCL/		Method	Analysis Date / By
				RL	QCL		
INORGANICS							
1927 Alkalinity, Total as CaCO3	159	mg/L		4		A2320 B	04/09/21 13:39 / mh
1928 Bicarbonate as HCO3	194	mg/L		4		A2320 B	04/09/21 13:39 / mh
1929 Carbonate as CO3	ND	mg/L		4		A2320 B	04/09/21 13:39 / mh
AGGREGATE ORGANICS							
2920 Organic Carbon, Total (TOC)	2.5	mg/L		0.5		A5310 C	04/13/21 23:52 / eli-ca

Report RL - Analyte Reporting Limit

Definitions: QCL - Quality Control Limit

MCL - Maximum Contaminant Level

ND - Not detected at the Reporting Limit (RL)



LABORATORY ANALYTICAL REPORT

Prepared by Billings, MT Branch

Client: Ciner Wyoming LLC

Client Sample ID: FINTOC-RSP03

PWS #: WY5600634 **Name:** CINER WYOMING LLC

Facility ID: TP02

SamplingPoint/Location: FINTOC / FINTOC-RSP03

Project ID: DBP Precursor WY5600634 NTNC

Collector's Name: Jack McCully

Contact Phone #: (307) 872-7207

Compliance Sample: YES

Sample Type: RT

Lab ID: B21040649-002

Report Date: 04/15/21

Collection Date: 04/07/21 08:45

Date Received: 04/08/21

Matrix: Drinking Water

Federal ID#: MT00005

FRDS Analyses	Result	Units	Qual	RL	MCL/ QCL	Method	Analysis Date / By
AGGREGATE ORGANICS							
2920 Organic Carbon, Total (TOC)	2.0	mg/L		0.5		A5310 C	04/14/21 00:52 / eli-ca

Report RL - Analyte Reporting Limit
Definitions: QCL - Quality Control Limit

MCL - Maximum Contaminant Level
ND - Not detected at the Reporting Limit (RL)



QA/QC Summary Report

Prepared by Casper, WY Branch

Client: Ciner Wyoming LLC

Work Order: B21040649

Report Date: 04/15/21

Analyte	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: A5310 C							Analytical Run: TOC4-C_210413A		
Lab ID: CCV-11940	Continuing Calibration Verification Standard								04/13/21 20:46
Organic Carbon, Total (TOC)	4.94	mg/L	0.50	99	90	110			
Lab ID: CCV-11940	Continuing Calibration Verification Standard								04/14/21 00:07
Organic Carbon, Total (TOC)	4.97	mg/L	0.50	99	90	110			
Method: A5310 C							Batch: R269308		
Lab ID: LCS-11923	Laboratory Control Sample								04/13/21 16:35
Organic Carbon, Total (TOC)	5.18	mg/L	0.50	104	89	113			
Lab ID: MBLK	Method Blank								04/13/21 16:50
Organic Carbon, Total (TOC)	ND	mg/L	0.2						
Lab ID: C21040412-001AMS	Sample Matrix Spike								04/13/21 17:42
Organic Carbon, Total (TOC)	13.3	mg/L	0.50	101	89	113			
Lab ID: C21040412-001AMSD	Sample Matrix Spike Duplicate								04/13/21 17:57
Organic Carbon, Total (TOC)	13.2	mg/L	0.50	99	89	113	0.7	20	
Lab ID: LCS-11923	Laboratory Control Sample								04/14/21 00:37
Organic Carbon, Total (TOC)	5.05	mg/L	0.50	101	89	113			

Qualifiers:

RL - Analyte Reporting Limit

ND - Not detected at the Reporting Limit (RL)



QA/QC Summary Report

Prepared by Billings, MT Branch

Client: Ciner Wyoming LLC

Work Order: B21040649

Report Date: 04/13/21

Analyte	Count	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: A2320 B										Batch: R358972
Lab ID: MBLK		Method Blank								Run: METROHM 2_210409A 04/09/21 11:44
Alkalinity, Total as CaCO3		ND	mg/L	4						
Lab ID: LCS		Laboratory Control Sample								Run: METROHM 2_210409A 04/09/21 11:48
Alkalinity, Total as CaCO3		102	mg/L	4.0	103	90	110			
Lab ID: B21040644-001ADUP	3	Sample Duplicate								Run: METROHM 2_210409A 04/09/21 12:00
Alkalinity, Total as CaCO3		352	mg/L	4.0				0.1	10	
Bicarbonate as HCO3		429	mg/L	4.0				0.1	10	
Carbonate as CO3		ND	mg/L	4.0					10	
Lab ID: B21040644-002AMS		Sample Matrix Spike								Run: METROHM 2_210409A 04/09/21 12:13
Alkalinity, Total as CaCO3		437	mg/L	4.0	96	80	120			
Lab ID: B21040647-004ADUP	3	Sample Duplicate								Run: METROHM 2_210409A 04/09/21 13:08
Alkalinity, Total as CaCO3		162	mg/L	4.0				0.2	10	
Bicarbonate as HCO3		198	mg/L	4.0				0.2	10	
Carbonate as CO3		ND	mg/L	4.0					10	

Qualifiers:

RL - Analyte Reporting Limit

ND - Not detected at the Reporting Limit (RL)



Work Order Receipt Checklist

Ciner Wyoming LLC

B21040649

Login completed by: Dylan A. Chirrick

Date Received: 4/8/2021

Reviewed by: BL2000\rshular

Received by: dac

Reviewed Date: 4/9/2021

Carrier name: Return-UPS NDA

- Shipping container/cooler in good condition? Yes No Not Present
- Custody seals intact on all shipping container(s)/cooler(s)? Yes No Not Present
- Custody seals intact on all sample bottles? Yes No Not Present
- Chain of custody present? Yes No
- Chain of custody signed when relinquished and received? Yes No
- Chain of custody agrees with sample labels? Yes No
- Samples in proper container/bottle? Yes No
- Sample containers intact? Yes No
- Sufficient sample volume for indicated test? Yes No
- All samples received within holding time?
(Exclude analyses that are considered field parameters such as pH, DO, Res Cl, Sulfite, Ferrous Iron, etc.) Yes No
- Temp Blank received in all shipping container(s)/cooler(s)? Yes No Not Applicable
- Container/Temp Blank temperature: 1.7°C On Ice
- Water - VOA vials have zero headspace? Yes No No VOA vials submitted
- Water - pH acceptable upon receipt? Yes No Not Applicable

Standard Reporting Procedures:

Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH, Dissolved Oxygen and Residual Chlorine, are qualified as being analyzed outside of recommended holding time.

Solid/soil samples are reported on a wet weight basis (as received) unless specifically indicated. If moisture corrected, data units are typically noted as –dry. For agricultural and mining soil parameters/characteristics, all samples are dried and ground prior to sample analysis.

Radiochemical precision results represent a 2-sigma Total Measurement Uncertainty.

Contact and Corrective Action Comments:

None



Chain of Custody & Analytical Request Record

www.energylab.com

Account Information (Billing information)

Company/Name Ciner Wyoming LLC
 Contact Hillary Huckfeldt
 Phone (307) 872-7207
 Mailing Address PO Box 513
 City State Zip Green River, WY 82935
 Email Accountspayable@ciner.us.com
 Receive Invoice Hard Copy Email Hard Copy Email
 Purchase Order 0151-020761
 Quote Bottle Order

Report Information (if different than Account Information)

Company/Name Ciner Wyoming LLC
 Contact Tara Nelson
 Phone (307) 872-7284
 Mailing Address PO Box 513
 City State Zip Green River, WY 82935
 Email tnelson@ciner.us.com
 Receive Report Hard Copy Email
 Special Report/Formats
 LEVEL IV NELAC EDD/EDT (contact laboratory) Other Drinking Water

Comments

REGULAR SAMPLES

Project Information

Project Name PWSID Permit, etc DBP Precursor, WY5600634 NTNC
 Sampler Name Jack McCully Sampler Phone (307) 872-7129
 Sample Origin State Wyoming EPA/State Compliance Yes No
 MINING CLIENTS please indicate sample type
 Byproduct 11 (e)2 material Unprocessed ore (NOT ground or refined)*

Matrix Codes

- A Air
- W Water
- S Solids
- V Vegetation
- B Bioassay
- O Other
- DW Drinking Water

Analysis Requested

Number of Containers	Matrix (See Codes Above)	Alkalinity	TOC	See Attached	RUSH TAT
1	DW	✓			8/21/06
1	DW		✓		
1	DW		✓		

All turnaround times are standard unless marked as RUSH
 Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

Sample Identification

(Name, Location, Interval, etc.)	Date	Time	Collection
1 RAWTOCA-RSP02	4/7/21	8 45 am	
2 RAWTOCA-RSP02	4/7/21	8 45 am	
3 FINTOC-RSP03	4/7/21	8 45 am	
4			
5			
6			
7			
8			
9			
10			

Custody Record MUST be signed	Reinquisitioned by (print) <i>Jacqui Mcnelly</i>	Date/Time <i>4/21/06 9:30am</i>	Signature
Shipped By	Reinquisitioned by (print) <i>Michelle Duvick</i>	Date/Time <i>4/21/06</i>	Signature
Cooler ID(s)	Custody Seals Y N C B	Intact Y N	Receipt Temp °C
	Temp Blank Y N	On Ice Y N	Payment Type Cash Check
	Amount \$	Receipt Number (cash/check only)	

In certain circumstances, samples submitted to Energy Laboratories, Inc may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly notated on your analytical report.



ANALYTICAL SUMMARY REPORT

May 07, 2021

Ciner Wyoming LLC
PO Box 513
Green River, WY 82935-0513

Work Order: B21050182
Project Name: DBP Precursor WY5600634 NTNC

Energy Laboratories Inc Billings MT received the following 2 samples for Ciner Wyoming LLC on 5/4/2021 for analysis.

Lab ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
B21050182-001	RAWTOCA-RSP02	05/03/21 11:50	05/04/21	Drinking Water	Alkalinity Carbon, Total Organic
B21050182-002	FINTOC-RSP03	05/03/21 11:50	05/04/21	Drinking Water	Carbon, Total Organic

The analyses presented in this report were performed by Energy Laboratories, Inc., 1120 S 27th St., Billings, MT 59101, unless otherwise noted. Any exceptions or problems with the analyses are noted in the Laboratory Analytical Report, the QA/QC Summary Report, or the Case Narrative. Any issues encountered during sample receipt are documented in the Work Order Receipt Checklist.

The results as reported relate only to the item(s) submitted for testing. This report shall be used or copied only in its entirety. Energy Laboratories, Inc. is not responsible for the consequences arising from the use of a partial report.

If you have any questions regarding these test results, please contact your Project Manager.

Report Approved By:



CLIENT: Ciner Wyoming LLC
Project: DBP Precursor WY5600634 NTNC
Work Order: B21050182

Report Date: 05/07/21

CASE NARRATIVE

Tests associated with analyst identified as ELI-CA were subcontracted to Energy Laboratories, PO Box 247, Casper, WY, EPA Number WY00002.



LABORATORY ANALYTICAL REPORT

Prepared by Billings, MT Branch

Client: Ciner Wyoming LLC

Client Sample ID: RAWTOCA-RSP02

PWS #: WY5600634 **Name:** CINER WYOMING LLC

Facility ID: IN01

SamplingPoint/Location: RAWTOCA / RAWTOCA-RSP02

Project ID: DBP Precursor WY5600634 NTNC

Collector's Name: Jack McCully

Contact Phone #: (307) 872-7207

Compliance Sample: YES

Sample Type: RT

Lab ID: B21050182-001

Report Date: 05/07/21

Collection Date: 05/03/21 11:50

Date Received: 05/04/21

Matrix: Drinking Water

Federal ID#: MT00005

FRDS Analyses	Result	Units	Qual	MCL/		Method	Analysis Date / By
				RL	QCL		
INORGANICS							
1927 Alkalinity, Total as CaCO3	162	mg/L		4		A2320 B	05/04/21 21:12 / mh
1928 Bicarbonate as HCO3	190	mg/L		4		A2320 B	05/04/21 21:12 / mh
1929 Carbonate as CO3	ND	mg/L		4		A2320 B	05/04/21 21:12 / mh
AGGREGATE ORGANICS							
2920 Organic Carbon, Total (TOC)	3.6	mg/L		0.5		A5310 C	05/06/21 23:40 / eli-ca

Report RL - Analyte Reporting Limit
Definitions: QCL - Quality Control Limit

MCL - Maximum Contaminant Level
ND - Not detected at the Reporting Limit (RL)



LABORATORY ANALYTICAL REPORT

Prepared by Billings, MT Branch

Client: Ciner Wyoming LLC

Client Sample ID: FINTOC-RSP03

PWS #: WY5600634 **Name:** CINER WYOMING LLC

Facility ID: TP02

SamplingPoint/Location: FINTOC / FINTOC-RSP03

Project ID: DBP Precursor WY5600634 NTNC

Collector's Name: Jack McCully

Contact Phone #: (307) 872-7207

Compliance Sample: YES

Sample Type: RT

Lab ID: B21050182-002

Report Date: 05/07/21

Collection Date: 05/03/21 11:50

Date Received: 05/04/21

Matrix: Drinking Water

Federal ID#: MT00005

FRDS Analyses	Result	Units	Qual	RL	MCL/ QCL	Method	Analysis Date / By
AGGREGATE ORGANICS							
2920 Organic Carbon, Total (TOC)	2.3	mg/L		0.5		A5310 C	05/07/21 00:01 / eli-ca

Report RL - Analyte Reporting Limit

Definitions: QCL - Quality Control Limit

MCL - Maximum Contaminant Level

ND - Not detected at the Reporting Limit (RL)



QA/QC Summary Report

Prepared by Casper, WY Branch

Client: Ciner Wyoming LLC

Work Order: B21050182

Report Date: 05/07/21

Analyte	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: A5310 C							Analytical Run: TOC4-C_210506A		
Lab ID: CCV-11940	Continuing Calibration Verification Standard						05/06/21 21:25		
Organic Carbon, Total (TOC)	5.11	mg/L	0.50	102	90	110			
Method: A5310 C							Batch: R270168		
Lab ID: LCS-11923	Laboratory Control Sample						Run: TOC4-C_210506A 05/06/21 17:15		
Organic Carbon, Total (TOC)	5.19	mg/L	0.50	104	89	113			
Lab ID: MBLK	Method Blank						Run: TOC4-C_210506A 05/06/21 17:31		
Organic Carbon, Total (TOC)	ND	mg/L	0.2						
Lab ID: C21041101-001FMS	Sample Matrix Spike						Run: TOC4-C_210506A 05/06/21 18:30		
Organic Carbon, Total (TOC)	6.27	mg/L	0.50	100	89	113			
Lab ID: C21041101-001FMSD	Sample Matrix Spike Duplicate						Run: TOC4-C_210506A 05/06/21 18:47		
Organic Carbon, Total (TOC)	6.35	mg/L	0.50	102	89	113	1.2	20	

Qualifiers:

RL - Analyte Reporting Limit

ND - Not detected at the Reporting Limit (RL)



QA/QC Summary Report

Prepared by Billings, MT Branch

Client: Ciner Wyoming LLC

Work Order: B21050182

Report Date: 05/07/21

Analyte	Count	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: A2320 B										Batch: R360145
Lab ID: MBLK		Method Blank								Run: METROHM 2_210504A 05/04/21 20:29
Alkalinity, Total as CaCO3		ND	mg/L	4						
Lab ID: LCS		Laboratory Control Sample								Run: METROHM 2_210504A 05/04/21 20:32
Alkalinity, Total as CaCO3		103	mg/L	4.0	103	90	110			
Lab ID: B21050173-002ADUP	3	Sample Duplicate								Run: METROHM 2_210504A 05/04/21 20:41
Alkalinity, Total as CaCO3		36.9	mg/L	4.0				0.3	10	
Bicarbonate as HCO3		45.0	mg/L	4.0				0.3	10	
Carbonate as CO3		ND	mg/L	4.0					10	
Lab ID: B21050173-003AMS		Sample Matrix Spike								Run: METROHM 2_210504A 05/04/21 20:48
Alkalinity, Total as CaCO3		172	mg/L	4.0	101	80	120			

Qualifiers:

RL - Analyte Reporting Limit

ND - Not detected at the Reporting Limit (RL)



Work Order Receipt Checklist

Ciner Wyoming LLC

B21050182

Login completed by: Dylan A. Chirrick

Date Received: 5/4/2021

Reviewed by: BL2000\raschim

Received by: dac

Reviewed Date: 5/5/2021

Carrier name: Return-UPS NDA

- Shipping container/cooler in good condition? Yes No Not Present
- Custody seals intact on all shipping container(s)/cooler(s)? Yes No Not Present
- Custody seals intact on all sample bottles? Yes No Not Present
- Chain of custody present? Yes No
- Chain of custody signed when relinquished and received? Yes No
- Chain of custody agrees with sample labels? Yes No
- Samples in proper container/bottle? Yes No
- Sample containers intact? Yes No
- Sufficient sample volume for indicated test? Yes No
- All samples received within holding time?
(Exclude analyses that are considered field parameters such as pH, DO, Res Cl, Sulfite, Ferrous Iron, etc.) Yes No
- Temp Blank received in all shipping container(s)/cooler(s)? Yes No Not Applicable
- Container/Temp Blank temperature: 3.9°C On Ice
- Water - VOA vials have zero headspace? Yes No No VOA vials submitted
- Water - pH acceptable upon receipt? Yes No Not Applicable

Standard Reporting Procedures:

Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH, Dissolved Oxygen and Residual Chlorine, are qualified as being analyzed outside of recommended holding time.

Solid/soil samples are reported on a wet weight basis (as received) unless specifically indicated. If moisture corrected, data units are typically noted as –dry. For agricultural and mining soil parameters/characteristics, all samples are dried and ground prior to sample analysis.

Radiochemical precision results represent a 2-sigma Total Measurement Uncertainty.

Contact and Corrective Action Comments:

None



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Chain of Custody (COC) & Analytical Request Record

Lab Workorder #: **B2050182**

Project Information

Client: Ciner Wyoming LLC
Project: DBP Precursor WY5600634 NTNC
Purchase Order:
Contact/Phone: Tara Nelson (307) 872-7284

Laboratory Use

Quote: N/A
BO#: 150542-S
EE#: 30255
Turn-Around Time: Standard

Critical Hold Time: 14 Days
of Samples: 2
Matrix: Drinking Water



Comments: Monthly Alk and TOC

Contact ELI prior to RUSH sample submittal for charges, availability & scheduling. Samples submitted may be subcontracted to other laboratories to complete the test(s) requested; this will be clearly noted on the analytical report.

Analysis Requested

Sample Identification	Collection Date/Time	Hold Time (Days)			# of Containers	Matrix	RUSH TAT	Analysis Requested			PWS System ID	PWS Facility ID	PWS Sample Pt ID
		14	28					Alkalinity (A2320 B)	Carbon, Total Organic (A5310)				
1 RAWTOCA-RSP02					2	DW		X	X	X	WY5600634	IN01	RAWTOCA
2 FINTOC-RSP03					1	DW		X	X	X	WY5600634	TP02	FINTOC
3													
4													
5													
6													
7													
8													
9													
10													
11													

Public Water Supply (PWS) Required System Information

Lab provided preservatives were used Yes No

Sampler Name (if different than Relinquished by):

Sampler Phone:

Relinquished by (print) _____
 Relinquished by (print) _____

Date/Time _____
 Date/Time _____

Signature _____
 Signature _____

Received by (print)

Received by Laboratory (print)

Date/Time

Signature

Signature



Treat our People. Trust our Data.

Chain of Custody & Analytical Request Record

www.energylab.com

Account Information (Billing information)

Company/Name: Hilary Huckfeldt
 Contact: Hilary Huckfeldt
 Phone: (307) 872-7207
 Mailing Address: PO Box 513
 City, State, Zip: Green River, WY 82935
 Email: AccountsPayable@ciner.us.com
 Receive Invoice: Hard Copy Email
 Receive Report: Hard Copy Email
 Purchase Order: 0151-020761
 Quote:
 Bottle Order:

Report Information (if different than Account Information)

Company/Name: Ciner Wyoming LLC
 Contact: Tara Nelson
 Phone: (307) 872-7284
 Mailing Address: PO Box 513
 City, State, Zip: Green River, WY 82935
 Email: tnelson@ciner.us.com
 Receive Report: Hard Copy Email
 Special Report/Formats: LEVEL IV NELAC EDD/EDT (contact laboratory) Other Drinking Water

Comments

REGULAR SAMPLES

Project Information

Project Name: PWSID, Permit, etc. DBP Precursor, WY5600634 NTNC
 Sampler Name: Jack McCully
 Sampler Phone: (307) 872-7129
 Sample Origin: State Wyoming
 EPA/State Compliance: Yes No
 MINING CLIENTS: please indicate sample type.
 Byproduct 11 (e2) material Unprocessed ore (NOT ground or refined)*

Matrix Codes
 A - Air
 W - Water
 S - Soils/
 V - Vegetation
 B - Bioassay
 O - Other
 DW - Drinking Water

Sample Identification (Name, Location, Interval, etc.)	Collection		Matrix (See Codes Above)	Number of Containers	Alkalinity	TOC
	Date	Time				
1 RAWTOCA-RSP02	5/12/21	11:50am	DW	1	✓	
2 RAWTOCA-RSP02	5/12/21	11:50am	DW	1	✓	
3 FINTOC-RSP03	5/12/21	11:50am	DW	1	✓	
4						
5						
6						
7						
8						
9						
10						

See Attached

Analysis Requested

All turnaround times are standard unless marked as RUSH.
 Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

RUSH
TAT
34050182

Custody Record MUST be signed

Reinquisitioned by (print): Jack M. Kelly
 Date/Time: 5/12/21 12:19pm
 Signature: [Signature]

Shipped By

Cooler ID(s): Y N C B
 Custody Seals: Y N C B
 Receipt Temp: °C
 Temp Blank: Y N
 On Ice: Y N
 Payment Type: CC Cash Check
 Amount: \$
 Reader Number (cash/check only):

Received by (print): [Signature]
 Laboratory (print): Energy Laboratories
 Date/Time: 5/12/21 12:19pm
 Signature: [Signature]

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly notated on your analytical report.



ANALYTICAL SUMMARY REPORT

June 14, 2021

Ciner Wyoming LLC
PO Box 513
Green River, WY 82935-0513

Work Order: B21060836

Project Name: DBP Precursor WY5600634 NTNC

Energy Laboratories Inc Billings MT received the following 2 samples for Ciner Wyoming LLC on 6/9/2021 for analysis.

Lab ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
B21060836-001	RAWTOCA-RSP02	06/08/21 9:30	06/09/21	Drinking Water	Alkalinity Carbon, Total Organic
B21060836-002	FINTOC-RSP03	06/08/21 9:30	06/09/21	Drinking Water	Carbon, Total Organic

The analyses presented in this report were performed by Energy Laboratories, Inc., 1120 S 27th St., Billings, MT 59101, unless otherwise noted. Any exceptions or problems with the analyses are noted in the Laboratory Analytical Report, the QA/QC Summary Report, or the Case Narrative. Any issues encountered during sample receipt are documented in the Work Order Receipt Checklist.

The results as reported relate only to the item(s) submitted for testing. This report shall be used or copied only in its entirety. Energy Laboratories, Inc. is not responsible for the consequences arising from the use of a partial report.

If you have any questions regarding these test results, please contact your Project Manager.

Report Approved By:



CLIENT: Ciner Wyoming LLC
Project: DBP Precursor WY5600634 NTNC
Work Order: B21060836

Report Date: 06/14/21

CASE NARRATIVE

Tests associated with analyst identified as ELI-CA were subcontracted to Energy Laboratories, PO Box 247, Casper, WY, EPA Number WY00002.



LABORATORY ANALYTICAL REPORT

Prepared by Billings, MT Branch

Client: Ciner Wyoming LLC

Client Sample ID: RAWTOCA-RSP02

PWS #: WY5600634 **Name:** CINER WYOMING LLC

Facility ID: IN01

SamplingPoint/Location: RAWTOCA / RAWTOCA-RSP02

Project ID: DBP Precursor WY5600634 NTNC

Collector's Name: Jack McCully

Contact Phone #: (307) 872-7207

Compliance Sample: YES

Sample Type: RT

Lab ID: B21060836-001

Report Date: 06/14/21

Collection Date: 06/08/21 09:30

Date Received: 06/09/21

Matrix: Drinking Water

Federal ID#: MT00005

FRDS Analyses	Result	Units	Qual	MCL/		Method	Analysis Date / By
				RL	QCL		
INORGANICS							
1927 Alkalinity, Total as CaCO3	150	mg/L		4		A2320 B	06/10/21 17:25 / mh
1928 Bicarbonate as HCO3	180	mg/L		4		A2320 B	06/10/21 17:25 / mh
1929 Carbonate as CO3	ND	mg/L		4		A2320 B	06/10/21 17:25 / mh
AGGREGATE ORGANICS							
2920 Organic Carbon, Total (TOC)	3.1	mg/L		0.5		A5310 C	06/13/21 19:24 / eli-ca

Report Definitions: RL - Analyte Reporting Limit
QCL - Quality Control Limit

MCL - Maximum Contaminant Level
ND - Not detected at the Reporting Limit (RL)



LABORATORY ANALYTICAL REPORT

Prepared by Billings, MT Branch

Client: Ciner Wyoming LLC

Client Sample ID: FINTOC-RSP03

PWS #: WY5600634 **Name:** CINER WYOMING LLC

Facility ID: TP02

SamplingPoint/Location: FINTOC / FINTOC-RSP03

Project ID: DBP Precursor WY5600634 NTNC

Collector's Name: Jack McCully

Contact Phone #: (307) 872-7207

Compliance Sample: YES

Sample Type: RT

Lab ID: B21060836-002

Report Date: 06/14/21

Collection Date: 06/08/21 09:30

Date Received: 06/09/21

Matrix: Drinking Water

Federal ID#: MT00005

FRDS Analyses	Result	Units	Qual	MCL/		Method	Analysis Date / By
				RL	QCL		
AGGREGATE ORGANICS							
2920 Organic Carbon, Total (TOC)	2.4	mg/L		0.5		A5310 C	06/13/21 20:28 / eli-ca

Report Definitions: RL - Analyte Reporting Limit
QCL - Quality Control Limit

MCL - Maximum Contaminant Level
ND - Not detected at the Reporting Limit (RL)



QA/QC Summary Report

Prepared by Casper, WY Branch

Client: Ciner Wyoming LLC

Work Order: B21060836

Report Date: 06/14/21

Analyte	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: A5310 C							Analytical Run: TOC4-C_210613A		
Lab ID: CCV-11940	Continuing Calibration Verification Standard						06/13/21 16:16		
Organic Carbon, Total (TOC)	5.48	mg/L	0.50	110	90	110			
Method: A5310 C							Batch: R271361		
Lab ID: MBLK	Method Blank						Run: TOC4-C_210613A 06/13/21 11:43		
Organic Carbon, Total (TOC)	ND	mg/L	0.2						
Lab ID: LCS-11923	Laboratory Control Sample						Run: TOC4-C_210613A 06/13/21 20:13		
Organic Carbon, Total (TOC)	5.13	mg/L	0.50	103	89	113			
Lab ID: B21060836-002AMS	Sample Matrix Spike						Run: TOC4-C_210613A 06/13/21 20:44		
Organic Carbon, Total (TOC)	7.58	mg/L	0.50	104	89	113			
Lab ID: B21060836-002AMSD	Sample Matrix Spike Duplicate						Run: TOC4-C_210613A 06/13/21 20:59		
Organic Carbon, Total (TOC)	7.52	mg/L	0.50	103	89	113	0.9	20	

Qualifiers:

RL - Analyte Reporting Limit

ND - Not detected at the Reporting Limit (RL)



QA/QC Summary Report

Prepared by Billings, MT Branch

Client: Ciner Wyoming LLC

Work Order: B21060836

Report Date: 06/14/21

Analyte	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: A2320 B									Batch: R362151
Lab ID: MBLK Alkalinity, Total as CaCO3	Method Blank ND	mg/L	4						Run: METROHM 2_210610A 06/10/21 11:23
Lab ID: MBLK Alkalinity, Total as CaCO3	Method Blank ND	mg/L	4						Run: METROHM 2_210610A 06/10/21 19:52
Lab ID: LCS Alkalinity, Total as CaCO3	Laboratory Control Sample 101	mg/L	4.0	101	90	110			Run: METROHM 2_210610A 06/10/21 19:56
Lab ID: B21060855-006ADUP Alkalinity, Total as CaCO3	Sample Duplicate 80.1	mg/L	4.0				8.0	10	Run: METROHM 2_210610A 06/10/21 20:06
Bicarbonate as HCO3	97.6	mg/L	4.0				8.0	10	
Carbonate as CO3	ND	mg/L	4.0					10	
Lab ID: B21060906-006ADUP Alkalinity, Total as CaCO3	Sample Duplicate 442	mg/L	4.0				0.0	10	Run: METROHM 2_210610A 06/10/21 21:14
Bicarbonate as HCO3	539	mg/L	4.0				0.0	10	
Carbonate as CO3	ND	mg/L	4.0					10	

Qualifiers:

RL - Analyte Reporting Limit

ND - Not detected at the Reporting Limit (RL)



Work Order Receipt Checklist

Ciner Wyoming LLC

B21060836

Login completed by: Rachael L. Rupp

Date Received: 6/9/2021

Reviewed by: BL2000\dachirrick

Received by: tkb

Reviewed Date: 6/9/2021

Carrier name: Return-UPS NDA

- Shipping container/cooler in good condition? Yes No Not Present
- Custody seals intact on all shipping container(s)/cooler(s)? Yes No Not Present
- Custody seals intact on all sample bottles? Yes No Not Present
- Chain of custody present? Yes No
- Chain of custody signed when relinquished and received? Yes No
- Chain of custody agrees with sample labels? Yes No
- Samples in proper container/bottle? Yes No
- Sample containers intact? Yes No
- Sufficient sample volume for indicated test? Yes No
- All samples received within holding time?
(Exclude analyses that are considered field parameters such as pH, DO, Res Cl, Sulfite, Ferrous Iron, etc.) Yes No
- Temp Blank received in all shipping container(s)/cooler(s)? Yes No Not Applicable
- Container/Temp Blank temperature: 2.7°C On Ice
- Water - VOA vials have zero headspace? Yes No No VOA vials submitted
- Water - pH acceptable upon receipt? Yes No Not Applicable

Standard Reporting Procedures:

Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH, Dissolved Oxygen and Residual Chlorine, are qualified as being analyzed outside of recommended holding time.

Solid/soil samples are reported on a wet weight basis (as received) unless specifically indicated. If moisture corrected, data units are typically noted as –dry. For agricultural and mining soil parameters/characteristics, all samples are dried and ground prior to sample analysis.

Radiochemical precision results represent a 2-sigma Total Measurement Uncertainty.

Contact and Corrective Action Comments:

None



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Chain of Custody (COC) & Analytical Request Record

Lab Workorder #: B21060836

Project Information

Client: Ciner Wyoming LLC
 Project: DBP Precursor WY5600634 NTNC
 Purchase Order:
 Contact/Phone: Tara Nelson (307) 872-7284

Laboratory Use

Quote: N/A
 BO#: 150284-S
 EE#: 30038
 Turn-Around Time: Standard

Critical Hold Time: 14 Days
 # of Samples: 2
 Matrix: Drinking Water



Comments: Monthly Alk and TOC

Analysis Requested

Sample ID	Sample Identification	Collection Date/Time	# of Containers	Hold Time (Days)				RUSH TAT	EPA/State Compliance	Alkalinity (A2320 B)	Carbon, Total Organic (A5310)	PWS System ID	PWS Facility ID	PWS Sample PI ID
				14	28	14	28							
1	RAWTOCA - RSP02		2	DW				X	X	X	WY5600634	IN01	RAWTOCA	
2	FLINTOC - RSP03		1	DW				X		X	WY5600634	TP02	FLINTOC	
3														
4														
5														
6														
7														
8														
9														
10														
11														

Public Water Supply (PWS) Required System Information

Lab provided preservatives were used Yes No

Sampler Name (if different than Relinquished by)

Sampler Phone

Relinquished by (print)	Signature	Date/Time
Relinquished by (print)	Signature	Date/Time
Received by (print)	Signature	Date/Time
Received by (print)	Signature	Date/Time

Custody Record MUST be signed



Trust our People. Trust our Data.

Chain of Custody & Analytical Request Record

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Account Information (Billing information)

Company/Name	Ciner Wyoming LLC		
Contact	Hillary Huckfeldt		
Phone	(307) 872-7207		
Mailing Address	PO Box 513		
City/State/Zip	Green River, WY 82935		
Email	AccountsPayable@ciner.us.com		
Receive Invoice	<input type="checkbox"/> Hard Copy	<input type="checkbox"/> Email	Receive Report <input type="checkbox"/> Hard Copy <input type="checkbox"/> Email
Purchase Order	Quote		Bottle Order
0151-020761			

Report Information (if different than Account Information)

Company/Name	Ciner Wyoming LLC		
Contact	Jack McCully		
Phone	(307) 872-7129		
Mailing Address	PO Box 513		
City/State/Zip	Green River, WY 82935		
Email	jmccully@ciner.us.com		
Receive Report	<input type="checkbox"/> Hard Copy	<input checked="" type="checkbox"/> Email	
Special Report/Formats	<input type="checkbox"/> LEVEL IV <input type="checkbox"/> NELAC <input type="checkbox"/> EDD/EOT (contact laboratory) <input checked="" type="checkbox"/> Other Drinking Water		

Comments

REGULAR SAMPLES

Project Information

Project Name	PWSID Permit, etc. DBP Precursor, WY5600634 NTNC		
Sampler Name	Jack McCully	Sampler Phone	(307) 872-7129
Sample Origin	State Wyoming	EPA/State Compliance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

MINING CLIENTS please indicate sample type
 *if one has been processed or refined, call before sending.
 Byproduct 11 (e2) material Unprocessed ore (NOT ground or refined)*

Matrix Codes

- A Air
- W Water
- S Solids
- V Vegetation
- B Bioassay
- O Other
- DW Drinking Water

Analysis Requested

Sample ID	Date	Time	Matrix (See Codes Above)	Number of Containers	Alkalinity	TOC	See Attached	Rush TAT
2 RAWTOCA-RSP02	6/8/21	9:30 am	DW	1	✓			
3 FINTOC-RSP03	6/8/21	9:30 am	DW	1				
4								
5								
6								
7								
8								
9								
10								

All turnaround times are standard unless marked as RUSH
 Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

Custody Record MUST be signed	Reinquired by (print)	Signature	Date/Time	Received by (print)	Signature	Date/Time			
	Jack McCully	<i>[Signature]</i>	6/8/21 10:00am	Matthew Burns	<i>[Signature]</i>	6/8/21 09:00			
Shipped By	Cooler ID(s)	Custody Seals	Intact	Receipt Temp °C	Temp Blank	On Ice	Payment Type	Amount	Receipt Number (cash/check only)
		Y N C B	Y N		Y N	Y N	CC Cash Check	\$	

In certain circumstances samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly noted on your analytical report.

Exhibit B

From: Nelson, Tara
Sent: Thursday, August 20, 2020 1:59 PM
To: EPA Region 8 Drinking Water ([redacted])
Cc: WY - GR Employees & Contractors
Subject: Ref: 8WD-SDA Public Notice (PN)
Attachments: Tier 2 Public Notice WY5600634_Ciner_TOCA_NOV TT_2020.08.18.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Tracking:	Recipient	Delivery
	EPA Region 8 Drinking Water ([redacted])	
	WY - GR Employees & Contractors	
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM
	[redacted]	Delivered: 8/20/2020 2:00 PM

Recipient

Delivery

[Redacted]

Delivered: 8/20/2020 2:01 PM
Delivered: 8/20/2020 2:01 PM
Delivered: 8/20/2020 2:01 PM
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Kindest Regards,
Tara Nelson
Environmental Specialist



Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7284
Email: tnelson@ciner.us.com

Visit our website at www.ciner.us.com

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

CINER WYOMING LLC Does not operate with enhanced coagulation to
(Name of Water System/Business) control disinfection byproduct (DBP) Precursors.

Our water system recently violated a drinking water requirement. Although this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we are doing to correct this situation.

We are required to remove specific disinfection byproduct (DBP) Precursors between source water and filtered water. The DBP Precursors test results from the last twelve (12) months that ended on 07/10/2020 show that our system does not meet the required DBP Precursors
(Month/Date/Year) removal rate. Running Annual Average (RAA) of the DBP Precursors removal ratio for this twelve (12) month period is calculated at .98, which is below the required ratio of 1.00. This is a treatment technique violation.

What should I do?

At this time, **no** alternative source of water is necessary. However, if you have any specific health concerns, consult your doctor.

What does this mean?

This is not an emergency. If it had been, you would have been notified immediately. Total Organic Carbon (TOC, a form of DBP Precursors) has no health effects. However, total organic carbon provides a medium for the formation of disinfection byproducts. These byproducts include trihalomethanes (TTHM's) and haloacetic acids (HAA5's). Drinking water containing these byproducts in excess of the MCL may lead to adverse health effects, liver, or kidney problems, or nervous system effects, and may lead to an increased risk of getting cancer.

What Happened? What is being done?

When disinfectants are used in the treatment of drinking water, disinfectants react with naturally-occurring DBP Precursors present in water to form DBPs. We are taking/have taken the following corrective actions: We will be replacing the media in our Domestic Water Mixed Media filter beds and servicing them internally for problems that could affect their removal efficiency.

We anticipate resolving the problem within 45 Days
(Estimated time frame)

If you have any questions, please contact Tara Nelson at (307) 872-7284
(Name of water system contact) (Phone number)
or PO Box 513 Green River WY 82935 email: tnelson@ciner.us.com
(Mailing address of PWS contact)

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

Date distributed: 8.20.2020
Public Water System ID# WY5600634 NTNC/SW

ATTENTION: PWS Operator/Responsible Party

Tier 2 public notice (PN) must be provided as soon as practical, but no later than 30 days after you learn of the violation (141.203(b)). The PN must remain in place for as long as the violation or situation persists, but in no case for less than seven days. The PN must be repeated every three months as long as the violation or situation persists.

Community systems must use one of the following methods of delivery (141.203(c)(1)):

- Hand or direct delivery
- Mail, as a separate notice or included with the bill

Non-community systems must use one of the following methods of delivery (141.203(c)(2)):

- Posting in conspicuous locations
- Hand delivery
- Mail

In addition, both community and non-community systems must use another method reasonably calculated to reach others if they would not be reached by the first method (141.203(c)). Such methods could include newspapers, email, or delivery to community organizations. If you post the notice, it must remain posted until the violation is resolved. If the violation has been resolved, you must post the notice for at least one week (141.203(b)). If you mail, post, or hand deliver, print your notice on letterhead, if available.

Corrective Actions

In your notice, describe corrective actions you took or are taking. This could include information stating that you have since taken or are in the process of taking the required samples.

After Issuing the Notice

Within ten days after issuing the notice, you must send to EPA a copy of each type of notice, along with a certification (see example below) that you have met all the public notice requirements. Mail copies to:

US EPA REGION 8
PUBLIC WATER SYSTEM PROGRAM - 8WD-SDA
1595 Wynkoop Street
DENVER CO 80202-1129


Or, you can fax a copy to 1-(877) 876-9101.

Certification of Public Notification

I Tara Nelson, Environmental Specialist certify that the attached public notification was issued (PWS Operator/Responsible Party)

from 8.20.2020 to 11.14.2020
(Date) (Date)

The attached notice was issued by email
(Method of delivery)

Signature  Date 8.20.2020

From: Nelson, Tara
Sent: Tuesday, April 6, 2021 1:43 PM
To: WY - Green River Employees; WY - Green River Contractors
Subject: Q3 2020 Tier II Public Notice 4/06/2021
Attachments: Q3 2020 Teir Two Public Notice 4_6_2021.pdf

Good Afternoon All,

Please read this Public Notice regarding our drinking water system. This is a follow up notice identical to the one issued last week but for Q3 2020. The domestic water is safe to drink, this notice is NOT an emergency. The attached document explains the corrective actions being taken and the estimated time frame to be corrected. We are expecting this due to the sample results we've received the past couple of quarters however we've seen an improvement in results over the past several months and we expect them to continue to get better based on our recent clarifier work and backflushing program.

We have been in communication with EPA, and have been working on correcting this issue since the first NOV was received in August 2020. Please let me know if you have any other questions or need more clarification.

Respectfully,
Tara Nelson
Environmental Specialist



Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7284 Cell: (307) 871-1698
Email: tnelson@ciner.us.com

Visit our website at www.ciner.us.com

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Ciner Wyoming LLC Does not operate with enhanced coagulation to
(Name of Water System/Business) control disinfection byproduct (DBP) Precursors.

Our water system recently violated a drinking water requirement. Although this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we are doing to correct this situation.

We are required to remove specific disinfection byproduct (DBP) Precursors between source water and filtered water. The DBP Precursors test results from the last twelve (12) months that ended on 09/30/2020 (Q3) show that our system does not meet the required DBP Precursors
(Month/Date/Year) removal rate. Running Annual Average (RAA) of the DBP Precursors removal ratio for this twelve (12) month period is calculated at .85, which is below the required ratio of 1.00. This is a treatment technique violation.

What should I do?

At this time, **no** alternative source of water is necessary. However, if you have any specific health concerns, consult your doctor.

What does this mean?

This is not an emergency. If it had been, you would have been notified immediately. Total Organic Carbon (TOC, a form of DBP Precursors) has no health effects. However, total organic carbon provides a medium for the formation of disinfection byproducts. These byproducts include trihalomethanes (TTHM's) and haloacetic acids (HAA5's). Drinking water containing these byproducts in excess of the MCL may lead to adverse health effects, liver, or kidney problems, or nervous system effects, and may lead to an increased risk of getting cancer.

What Happened? What is being done?

When disinfectants are used in the treatment of drinking water, disinfectants react with naturally-occurring DBP Precursors present in water to form DBPs. We are taking/have taken the following corrective actions: **Please See Attached.**

We anticipate resolving the problem within 5-6 months or approximately by 9/10/2021

(Estimated time frame)

If you have any questions, please contact Tara Nelson, E.S. at (307) 872-7284,
(Name of water system contact) (Phone number)

or P O Box 513, 254 County Road 4-6, Green River WY 82935
(Mailing address of PWS contact)

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

Date distributed: 4/6/2021

Public Water System ID# WY5600634 NTNC

ATTENTION: PWS Operator/Responsible Party

Tier 2 public notice (PN) must be provided as soon as practical, but no later than 30 days after you learn of the violation (141.203(b)). The PN must remain in place for as long as the violation or situation persists, but in no case for less than seven days. The PN must be repeated every three months as long as the violation or situation persists.

Community systems must use one of the following methods of delivery (141.203(c)(1)):

- Hand or direct delivery
- Mail, as a separate notice or included with the bill

Non-community systems must use one of the following methods of delivery (141.203(c)(2)):

- Posting in conspicuous locations
- Hand delivery
- Mail

In addition, both community and non-community systems must use another method reasonably calculated to reach others if they would not be reached by the first method (141.203(c)). Such methods could include newspapers, email, or delivery to community organizations. If you post the notice, it must remain posted until the violation is resolved. If the violation has been resolved, you must post the notice for at least one week (141.203(b)). If you mail, post, or hand deliver, print your notice on letterhead, if available.

Corrective Actions

In your notice, describe corrective actions you took or are taking. This could include information stating that you have since taken or are in the process of taking the required samples.

After Issuing the Notice

Within ten days after issuing the notice, you must send to EPA a copy of each type of notice, along with a certification (see example below) that you have met all the public notice requirements. Mail copies to:

PN Rule Manager
 US EPA Region 8
 Drinking Water Program (8WP-SD)
 1595 Wynkoop Street
 Denver, CO 80202-1129

You can also fax a copy to **1-877-876-9101**, or email a copy to R8DWU@epa.gov.

Certification of Public Notification

I Tara Nelson, Environmental Specialist certify that the attached public notification was issued (PWS Operator/Responsible Party)

From 4/6/2021 to 9/10/2021
 (Date) (Date)

The attached notice was issued by email
 (Method of delivery)

Signature 

Date 04/06/2021

Actions Taken Since 8/2020 to improve the Removal Compliance Ratio :

1. Replaced media in PFD03A
2. Replaced media in PFD03B
3. Clarifier 02 (CLA02) inspection and PM
4. PHF09 sand filter media replaced

5. RFW07 media change complete, filter is in service.
6. CLA01 has been drained.
 - a. Bottom mud layer has been cleaned out.
 - b. Structural integrity has been confirmed – wall thickness survey complete.
 - c. Launderers to be cleaned out and descaled tomorrow.
 - d. Rake to bottom distance has been confirmed to be 3" ~ a little high.
 - e. Clean up of rake and turbine lube oil to be completed tomorrow.
 - f. Clarifier will be put back in service the evening of 3/12.
7. Domestic Water filters:
 - a. Additional material has been ordered and received.
 - b. Plans for addition in the works – schedule for week of 3/22.
 - c. Implemented backflush schedule for weekly on Sunday.
8. RWF04 Media Changeout.
 - a. Work to begin the week of 3/15 – material is on-site.
 - b. Contractor under contract for services,
 - c. Open item is contract and scheduling for Hivac services to remove media.
9. Raw Filter Turbidity.
 - a. We continue to take turbidity measurements and monitor.
 - b. Turbidity is steady.
10. Clarifier dumps
 - a. Implemented weekly clarifier dumps for 5 minutes to clear mud.
 - b. Purpose is to clear out any bottom mud and maintain good clarifier mud layer.

Actions to be Taken Planning Forward:

- 1) RWF04 media change
 - a. We have scaffolding set up and a contractor to change media.
 - b. Working through procurement for hivac services, once set up, we'll knock this filter out in a manner of 5 days.
- 2) CLA03
 - a. We've work out a methodology for taking down clarifier and cleanout / inspection.
 - b. We are moving into run off season and it may not be wise to take this down until July time frame.
 - c. It would require approximately 5 days to conduct.

From: Nelson, Tara
Sent: Tuesday, April 6, 2021 1:53 PM
To: EPA Region 8 Drinking Water (r8dwu@epa.gov)
Cc: Tourney, Seth; Morgan, Ronald; Gitelman, David; Schiltz, Tyler; Huckfeldt, Hilary; Spicer, Jeramy; Tardoni, James
Subject: RE: 8WD-SDA PSW ID# 5600634 NTNC/SW Tier 2 Public Notice Q3 2020 04/06/2021 Ciner Wyoming LLC
Attachments: Q3 2020 Tier II Public Notice 4/06/2021
Follow Up Flag: Flag for follow up
Flag Status: Flagged

Good Afternoon,

Please accept this communication as action item 2, Tier II Public Notice for Q3 2020, providing your office with a copy of our Public Notice and Certification within 10 days of completion.

Ciner Wyoming LLC, Published Tier 2 Public Notice Q4 2020 on 3/31/2021. The Public Notice is attached and was delivered by email to EPA, Region8, all Ciner Green River employees, and WY Contractors. This notice was also posted in conspicuous locations throughout the plant [40CFR 141.203(c)].

Ciner Wyoming LLC is providing you with a copy of our Public Notice and Certification dated 4/06/2021, within ten days of completion as attached.

Ciner Wyoming LLC Departments met on 3/22/2021 to evaluate and schedule the measures to implement and improve the TOC removal through the treatment plant. This information is described under the action we are taking, (Public Notice Attachment, page 3), and was completed on 3/29/2021.

We will continue to collect all required DBP precursor samples during each required sampling period and submit the results and RAA compliance calculations to the EPA within 10 days following each quarter.

Please let me know if you have any questions, concerns or suggestions regarding this action.

Kindest Regards,
Tara Nelson
Environmental Specialist



Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7284
Email: tnelson@ciner.us.com

Visit our website at www.ciner.us.com

Respectfully,
Tara Nelson
Environmental Specialist

Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7284 Cell: (307) 871-1698
Email: tnelson@ciner.us.com

Visit our website at www.ciner.us.com

From: Nelson, Tara
Sent: Wednesday, March 31, 2021 3:35 PM
To: WY - GR Employees & Contractors
Subject: FW: 8WD-SDA PSW ID# 5600634 NTNC/SW Tier 2 Public Notice 3/31/2021
Attachments: Signed Tier 2 Public Notice 3_31_2021.pdf; WY5600634_Ciner_TOCA_NOV_TT_2021.03.15.pdf

Good Afternoon All,

Please read this notice of Noncompliance regarding our drinking water requirements. This document explains the corrective action being taken and the estimated time frame to be corrected. The domestic water is safe to drink, this notice is NOT an emergency.

On 3/15/2021 Ciner Wyoming LLC, received a Notice of Noncompliance for "Failure to meet the Treatment Technique for Control of Disinfection Byproducts (DBP) Precursors." violation of 40 C.F.R. §141.135 of the National Primary Drinking Water Regulations (NPDWR), as attached and stated below:

"Your water system has monitored and submitted 12 months of source water TOC, combined filter effluent TOC, and source water alkalinity data between October of 2019 and September of 2020. The RAA of TOC removal ratio during the 12-month period was calculated at 0.85, which is below the required removal ratio of 1.00. Neither did your system meet any one of the ACC listed in 40 C.F.R. §141.135(a)(2) nor 141.135(a)(3). Thus, your system fails to operate with enhanced coagulation. This is a violation of the treatment technique for control of DBP precursors."

"Additionally, you water system has monitored and submitted 12 months of source water TOC, combined filter effluent TOC, and source water alkalinity data between January of 2020 and December of 2020. The RAA of TOC removal ratio during the 12-month period was calculated at 0.81, which is below the required removal ratio of 1.00. Neither did your system meet any one of the ACC listed in 40 C.F.R. §141.135(a)(2) nor 141.135(a)(3). Thus, your system fails to operate with enhanced coagulation. This is another violation of the treatment technique for control of DBP precursors."

1. Ciner Wyoming LLC, Published Tier 2 Public Notice on 3/31/2021. The Public Notice is attached and was delivered by email to EPA, Region8, all Ciner Green River employees, and WY Contractors. This notice was also posted in conspicuous locations throughout the plant [40CFR 141.203(c)].
2. Ciner Wyoming LLC is providing you with a copy of our Public Notice and Certification dated 3/31/2021, within ten days of completion as attached.
3. Ciner Wyoming LLC Departments met on 3/22/2021 to evaluate and schedule the measures to implement and improve the TOC removal through the treatment plant. This information is described under the action we are taking, (Public Notice Attachment, page 3).
4. We will continue to collect all required DBP precursor samples during each required sampling period and submit the results and RAA compliance calculations to the EPA within 10 days following each quarter.

Please let me know if you have any questions, concerns or suggestions regarding this action.

Kindest Regards,
Tara Nelson
Environmental Specialist



Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7284
Email: tnelson@ciner.us.com

Visit our website at www.ciner.us.com

Respectfully,
Tara Nelson
Environmental Specialist

Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7284 Cell: (307) 871-1698
Email: tnelson@ciner.us.com

Visit our website at www.ciner.us.com

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Ciner Wyoming LLC Does not operate with enhanced coagulation to
(Name of Water System/Business) control disinfection byproduct (DBP) Precursors.

Our water system recently violated a drinking water requirement. Although this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we are doing to correct this situation.

We are required to remove specific disinfection byproduct (DBP) Precursors between source water and filtered water. The DBP Precursors test results from the last twelve (12) months that ended on 12/21/2020 show that our system does not meet the required DBP Precursors
(Month/Date/Year)
removal rate. Running Annual Average (RAA) of the DBP Precursors removal ratio for this twelve (12) month period is calculated at .81, which is below the required ratio of 1.00. This is a treatment technique violation.

What should I do?

At this time, **no** alternative source of water is necessary. However, if you have any specific health concerns, consult your doctor.

What does this mean?

This is not an emergency. If it had been, you would have been notified immediately. Total Organic Carbon (TOC, a form of DBP Precursors) has no health effects. However, total organic carbon provides a medium for the formation of disinfection byproducts. These byproducts include trihalomethanes (TTHM's) and haloacetic acids (HAA5's). Drinking water containing these byproducts in excess of the MCL may lead to adverse health effects, liver, or kidney problems, or nervous system effects, and may lead to an increased risk of getting cancer.

What Happened? What is being done?

When disinfectants are used in the treatment of drinking water, disinfectants react with naturally-occurring DBP Precursors present in water to form DBPs. We are taking/have taken the following corrective actions: **Please See Attached.**

We anticipate resolving the problem within 5-6 months or approximately by 9/10/2021

(Estimated time frame)

If you have any questions,

Tara Nelson, E.S.

please contact (307) 872-7284

P O Box 513, 254 County Road 4-6, Green River WY 82935

(contact) (Phone)

or

(Mailing address of PWS contact)

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

Date distributed: 3/31/2021

Public Water System ID# WY5600634 NTNC

ATTENTION: PWS Operator/Responsible Party

Tier 2 public notice (PN) must be provided as soon as practical, but no later than 30 days after you learn of the violation (141.203(b)). The PN must remain in place for as long as the violation or situation persists, but in no case for less than seven days. The PN must be repeated every three months as long as the violation or situation persists.

Community systems must use one of the following methods of delivery (141.203(c)(1)):

- Hand or direct delivery
- Mail, as a separate notice or included with the bill

Non-community systems must use one of the following methods of delivery (141.203(c)(2)):

- Posting in conspicuous locations
- Hand delivery
- Mail

In addition, both community and non-community systems must use another method reasonably calculated to reach others if they would not be reached by the first method (141.203(c)). Such methods could include newspapers, email, or delivery to community organizations. If you post the notice, it must remain posted until the violation is resolved. If the violation has been resolved, you must post the notice for at least one week (141.203(b)). If you mail, post, or hand deliver, print your notice on letterhead, if available.

Corrective Actions

In your notice, describe corrective actions you took or are taking. This could include information stating that you have since taken or are in the process of taking the required samples.

After Issuing the Notice

Within ten days after issuing the notice, you must send to EPA a copy of each type of notice, along with a certification (see example below) that you have met all the public notice requirements. Mail copies to:

PN Rule Manager
 US EPA Region 8
 Drinking Water Program (8WP-SD)
 1595 Wynkoop Street
 Denver, CO 80202-1129


You can also fax a copy to **1-877-876-9101**, or email a copy to R8DWU@epa.gov.

Certification of Public Notification

I Tara Nelson, Environmental Specialist certify that the attached public notification was issued (PWS Operator/Responsible Party)

From 3/31/2021 to 9/10/2021.
(Date) (Date)

The attached notice was issued by email.
(Method of delivery)

Signature 

Date 03/31/2021

Water Progress

Actions Taken Since 8/2020 to improve the Removal Compliance Ratio :

1. Replaced media in PFD03A
2. Replaced media in PFD03B
3. Clarifier 02 (CLA02) inspection and PM
4. PHF09 sand filter media replaced

5. RFW07 media change complete, filter is in service.
6. CLA01 has been drained.
 - a. Bottom mud layer has been cleaned out.
 - b. Structural integrity has been confirmed – wall thickness survey complete.
 - c. Launderers to be cleaned out and descaled tomorrow.
 - d. Rake to bottom distance has been confirmed to be 3" ~ a little high.
 - e. Clean up of rake and turbine lube oil to be completed tomorrow.
 - f. Clarifier will be put back in service the evening of 3/12.
7. Domestic Water filters:
 - a. Additional material has been ordered and received.
 - b. Plans for addition in the works – schedule for week of 3/22.
 - c. Implemented backflush schedule for weekly on Sunday.
8. RWF04 Media Changeout.
 - a. Work to begin the week of 3/15 – material is on-site.
 - b. Contractor under contract for services,
 - c. Open item is contract and scheduling for Hivac services to remove media.
9. Raw Filter Turbidity.
 - a. We continue to take turbidity measurements and monitor.
 - b. Turbidity is steady.
10. Clarifier dumps
 - a. Implemented weekly clarifier dumps for 5 minutes to clear mud.
 - b. Purpose is to clear out any bottom mud and maintain good clarifier mud layer.

Actions to be Taken Planning Forward:

- 1) RWF04 media change
 - a. We have scaffolding set up and a contractor to change media.
 - b. Working through procurement for hivac services, once set up, we'll knock this filter out in a manner of 5 days.
- 2) CLA03
 - a. We've work out a methodology for taking down clarifier and cleanout / inspection.
 - b. We are moving into run off season and it may not be wise to take this down until July time frame.
 - c. It would require approximately 5 days to conduct.

From: Nelson, Tara
Sent: Wednesday, March 31, 2021 4:03 PM
To: EPA Region 8 Drinking Water (r8dwu@epa.gov)
Cc: Tourney, Seth; Morgan, Ronald; Gitelman, David; Schiltz, Tyler; Huckfeldt, Hilary; Spicer, Jeramy; Tardoni, James
Subject: 8WD-SDA PSW ID# 5600634 NTNC/SW Tier 2 Public Notice 3/31/2021 Ciner Wyoming LLC (Notice of Noncompliance dated 3/15/2021)
Attachments: Signed Tier 2 Public Notice 3_31_2021.pdf; FW: 8WD-SDA PSW ID# 5600634 NTNC/SW Tier 2 Public Notice 3/31/2021

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Good Afternoon,

Please accept this communication as action item 2 of the referenced notice, providing your office with a copy of our Public Notice and Certification within 10 days of completion.

Ciner Wyoming LLC, Published Tier 2 Public Notice on 3/31/2021. The Public Notice is attached and was delivered by email to EPA, Region8, all Ciner Green River employees, and WY Contractors. This notice was also posted in conspicuous locations throughout the plant [40CFR 141.203(c)].

Ciner Wyoming LLC is providing you with a copy of our Public Notice and Certification dated 3/31/2021, within ten days of completion as attached.

Ciner Wyoming LLC Departments met on 3/22/2021 to evaluate and schedule the measures to implement and improve the TOC removal through the treatment plant. This information is described under the action we are taking, (Public Notice Attachment, page 3), and was completed on 3/29/2021.

We will continue to collect all required DBP precursor samples during each required sampling period and submit the results and RAA compliance calculations to the EPA within 10 days following each quarter.

Please let me know if you have any questions, concerns or suggestions regarding this action.

Kindest Regards,
Tara Nelson
Environmental Specialist


Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7284
Email: tnelson@ciner.us.com

Visit our website at www.ciner.us.com

Respectfully,
Tara Nelson
Environmental Specialist

Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7284 Cell: (307) 871-1698
Email: tnelson@ciner.us.com

Visit our website at www.ciner.us.com

From: Schiltz, Tyler
Sent: Tuesday, May 25, 2021 3:13 PM
To: WY - GR Employees & Contractors
Cc: Huckfeldt, Hilary
Subject: RE: Public Notice 5/25/2021 (8WD-SDA WY5600634 DBP)
Attachments: Signed Public Notice WY5600634 Ciner TT failure for DBP.pdf

Good afternoon,

Please read the attached Public Notice (also posted on plant bulletin boards) regarding our drinking water system. This document explains the corrective action being taken and the estimated time frame to be corrected. The domestic water is safe to drink, this notice is NOT an emergency.

If you have any questions or concerns please do not hesitate to contact me or email environmental@ciner.us.com

Thanks!

Tyler Schiltz E.I.T.

Environmental Superintendent



PO Box 513 | 254 County Road 4-6 | Green River, WY 82935

Phone: (307) 872-7150

Email: tschiltz@ciner.us.com

<https://www.linkedin.com/in/tyler-schiltz/>

Visit our website at www.ciner.us.com



Please consider the environment before printing this e-mail

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Ciner Wyoming LLC

(Name of Water System/Business)

Does not operate with enhanced coagulation to control disinfection byproduct (DBP) Precursors.

Our water system recently violated a drinking water requirement. Although this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we are doing to correct this situation.

We are required to remove specific disinfection byproduct (DBP) Precursors between source water and filtered water. The DBP Precursors test results from the last twelve (12) months that ended on 3/31/2021 show
(Month/Date/Year)

that our system does not meet the required DBP Precursors removal rate. Running Annual Average (RAA) of the DBP Precursors removal ratio for this twelve (12) month period is calculated at .78, which is below the required ratio of 1.00. This is a treatment technique violation.

What should I do?

At this time, **no** alternative source of water is necessary. However, if you have any specific health concerns, consult your doctor.

What does this mean?

This is not an emergency. If it had been, you would have been notified immediately. Total Organic Carbon (TOC, a form of DBP Precursors) has no health effects. However, total organic carbon provides a medium for the formation of disinfection byproducts. These byproducts include trihalomethanes (TTHM's) and haloacetic acids (HAA5's). Drinking water containing these byproducts in excess of the MCL may lead to adverse health effects, liver, or kidney problems, or nervous system effects, and may lead to an increased risk of getting cancer.

What Happened? What is being done?

When disinfectants are used in the treatment of drinking water, disinfectants react with naturally-occurring DBP Precursors present in water to form DBPs. We are taking/have taken the following corrective actions:

Investigating and monitoring clarifier flow rates and coagulant dosing; continuing maintenance activities on clarifiers and filters.

We anticipate resolving the problem within 5 months
(Estimated time frame)

If you have any questions, please contact Tyler Schiltz, Environmental Superintendent at (307) 872-7150
(Name of water system contact) (Phone number)

or 254 County Road 4-6, PO Box 513 Green River WY 82935
(Mailing address of PWS contact)

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

Date distributed: 05/25/2021

Public Water System ID# WY5600634 NTNC

From: Schiltz, Tyler
Sent: Tuesday, May 25, 2021 3:24 PM
To: R8DWU@epa.gov
Cc: Tourney, Seth; Huckfeldt, Hilary
Subject: WY5600634 DBP - Public notice posted - Ciner Wyoming LLC
Attachments: Signed Public Notice WY5600634 Ciner TT failure for DBP for EPA.pdf; RE: Public Notice 5/25/2021 (8WD-SDA WY5600634 DBP)

Please find attached the Public notice that was publicly posted and sent out today. Also included is the signed EPA public notice form. Please let me know if you have any questions, thanks!

Tyler Schiltz E.I.T.

Environmental Superintendent



PO Box 513 | 254 County Road 4-6 | Green River, WY 82935
Phone: (307) 872-7150
Email: tschiltz@ciner.us.com

<https://www.linkedin.com/in/tyler-schiltz/>

Visit our website at www.ciner.us.com

 Please consider the environment before printing this e-mail

Exhibit C

Template on Reverse

Since surface water treatment filtration treatment technique violations are included in Tier 2, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation (141.203(b)).

Community systems must use one of the following methods (141.203(c)):

1. Hand or direct delivery
2. Mail, as a separate notice or included with the bill

Non-community systems must use one of the following methods (141.203(c)):

3. Posting in conspicuous locations
4. Hand delivery
5. Mail

In addition, both community and non-community systems must use *another* method reasonably calculated to reach others if they would not be reached by the first method (141.203(c)). Such methods could include newspapers, e-mail, or delivery to community organizations. If you mail, post, or hand deliver, print your notice on letterhead, if available.

The notice on the reverse is appropriate for hand delivery or mail. However, you may wish to modify it before using it for posting. If you do, you must still include all the required elements and leave the mandatory health effects language in italics unchanged.

Corrective Action

In your notice, describe corrective actions you are taking. Listed below are some steps commonly taken by water systems with filtration treatment technique violations. Use one or more of the following actions, if appropriate, or develop your own:

1. We added chemicals that reduce turbidity.
2. We sampled both untreated and treated water for the presence of coliform bacteria.
3. We monitored chlorine levels and adjusted them as needed to compensate for the filtration problems.
4. We inspected and cleaned the filters.

After Issuing Notice Within ten days after issuing the notice, you must send to EPA a copy of each type of notice, along with certification that you have met all the public notice requirements. E-mail copies to Jake Crosby at crosby.jake@epa.gov or mail copies to:

Jake Crosby
US EPA Region 8 (8WP-SDB)
1595 Wynkoop Street
Denver, CO 80202-1129

Certification of Public Notification

Hilary Huckfeldt certify that the attached public notification was issued
(PWS Operator/Responsible Party)

From 11/12/18 to 11/19/18
(Date) (Date)

The attached notice was issued by Email and Plant TVs
(Method of delivery)

Signature  Date 11/12/2018

Exhibit D

From: Huckfeldt, Hilary
Sent: Friday, January 12, 2018 8:26 AM
To: 'Crosby, Jake'; Schiltz, Tyler
Cc: McCully, Jack; Green, Kevin
Subject: RE: Ciner turbidity exceedance
Attachments: Turbidity15MinData.xlsx

Hi Jake,

I will give you a call in a few minutes to discuss this. Attached are the 15 minute readings for the last few days. The columns are read as the time stamp on the left minus 45 mins, minus 30 mins, minus 15 mins, and then the last turbidity on the right column is the actual time stamp on the left. I've highlighted the turbidity data over 0.3 NTU that I saw.

I talked with our water operators this morning and they are working on getting the clarifier cleared up. The turbidity is dropping but not completely under control yet. When the clarifier is under control, they plan to dump the domestic tank and do a system flush with good clean water. The do not drink order is still in effect at the plant and has been since Tyler emailed you yesterday.

They were not able to store clean water for a period of time due to the refinery taking too much water for our process and the domestic tanks being emptied due to shower usage.

Thanks,

Hilary M. Huckfeldt
Environmental Specialist



Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7207
Fax: (307) 872-7309
Email: hhuckfeldt@ciner.us.com

Visit our website at www.ciner.us.com

From: Crosby, Jake [mailto:Crosby.Jake@epa.gov]
Sent: Thursday, January 11, 2018 4:42 PM
To: Schiltz, Tyler <TSchiltz@Ciner.us.com>
Cc: Huckfeldt, Hilary <HHuckfeldt@ciner.us.com>; McCully, Jack <JMcCully@Ciner.us.com>
Subject: RE: Ciner turbidity exceedance

Hi Tyler,

Thank you for sending this notification. Per our conversation, the Ciner potable water system is currently operating with a filtered water turbidity of >1.5 NTU. You aren't sure about the specific cause of the high turbidity, but it is connected

to an ice blockage that occurred at the intake early this morning. The filtered water turbidity rose to 1.04 NTU at 8:45 am, and has stayed above 1 NTU, but below 2 NTU ever since. The turbidity is currently at 1.71 NTU. You plan to issue a boil order, and have already notified all employees via e-mail and posted signs at bathrooms, etc.

As we discussed, it may be helpful to evaluate the possibility of using stored water for a period of time. It sounds like the operators have been unable to get the turbidity under control, and the levels have slowly increased through the course of the day. Again, maintaining system pressure is a priority, so this should only be done if there is adequate stored water to maintain system pressure.

I also requested that Ciner provide detailed filtered water turbidity readings for the duration of the event (recorded every 15 minutes or more frequently). It sounded like you would be able to provide me with these in the morning.

Please contact me (or have Hilary or another Ciner representative call) in the morning to give me an update. There is a possibility that this event will trigger an Emergency Administrative Order.

Thanks!

Jake

Jake Crosby, PE | Environmental Engineer
Safe Drinking Water Program | USEPA Region 8 | 8WP-SDB
1595 Wynkoop St, Denver, CO 80202
303.312.6389

From: Schiltz, Tyler [<mailto:TSchiltz@Ciner.us.com>]
Sent: Thursday, January 11, 2018 3:55 PM
To: Crosby, Jake <Crosby.Jake@epa.gov>
Cc: Huckfeldt, Hilary <HHuckfeldt@ciner.us.com>; McCully, Jack <JMcCully@Ciner.us.com>
Subject: Ciner turbidity exceedance

Jake,

Just letting you know that we had an exceedance event today where we reached a level above 1NTU. Starting at about 3-4am this morning the river intake was plugged with ice which led to other problems in the powerhouse and a high NTU value (over 1) starting at 8:45 and running through 4pm (now). We have made notification via our red/green signs posted at each tap in the distribution system and will post a formal public notice in the morning.

Tyler Schiltz E.I.T.

Principal Engineer
Environmental Department



Ciner Wyoming LLC

PO Box 513 | 254 County Road 4-6 | Green River, WY 82935
Phone: (307) 872-7150

Email: tschiltz@ciner.us.com

Visit our website at www.ciner.us.com



Please consider the environment before printing this e-mail

From: Huckfeldt, Hilary
Sent: Friday, January 12, 2018 3:41 PM
To: 'Crosby, Jake'; Schiltz, Tyler
Cc: McCully, Jack; Green, Kevin; Copeland, Michael
Subject: RE: Ciner turbidity exceedance
Attachments: certification.pdf; Update1.12.18.xlsx

Hi Jake,

Attached is the certification from the public notice we sent out this afternoon. Also attached is an updated list of current turbidity levels. The yellow is from a calibration. The orange is from backwashing the filter.

Just talked with the operators for an up to the minute update. The turbidity going into T-25A is 0.79 NTU (isolated domestic water feed tank). The turbidity going into T-77 is 0.10 NTU (domestic storage tank). T-77 is in the process of being filled still.

I'll keep you up to date if we have any more issues. Have a nice weekend!

Thanks,

Hilary M. Huckfeldt
Environmental Specialist



Ciner Wyoming LLC
254 County Road 4-6 | PO Box 513 | Green River, WY 82935
Phone: (307) 872-7207
Fax: (307) 872-7309
Email: hhuckfeldt@ciner.us.com

Visit our website at www.ciner.us.com

From: Crosby, Jake [mailto:Crosby.Jake@epa.gov]
Sent: Friday, January 12, 2018 11:54 AM
To: Huckfeldt, Hilary <HHuckfeldt@ciner.us.com>; Schiltz, Tyler <TSchiltz@Ciner.us.com>
Cc: McCully, Jack <JMcCully@Ciner.us.com>; Green, Kevin <kgreen@ciner.us.com>; Copeland, Michael <Copeland.Michael@epa.gov>
Subject: RE: Ciner turbidity exceedance

Hi Hilary,

Thank you again for providing this additional information, and also for calling to provide me with an update this morning. We discussed the following:

1. Based on the current status of the situation, it does not appear that an emergency administrative order will be necessary. Please update me immediately if the situation worsens.
2. Provide me with an update of current turbidity levels (combined filter effluent turbidity from your compliance monitoring location) sometime this afternoon before 4:00 pm.
3. Provide public notice to all of the Ciner employees using the attached template. Some of this information can be modified to better fit your situation. For instance, you can modify the language about not needing to boil the water to reflect how you are handling the situation and make it consistent with your other messages. The language in italics cannot be modified. Send the certification portion of the form back to me after it has been distributed.
4. You will receive a notice of violation for exceeding the maximum allowable combined filter effluent turbidity of 1 NTU. This will not be mailed out until after I receive your monthly operating report for the month of January. Depending on how the rest of the month goes, you may also receive a violation for exceeding 0.3 NTU in more than 5% of your monthly compliance readings.
5. There is a possibility that you will be receiving an administrative order for this violation at some point in the future (it would likely be a couple of months). This order would require you to respond with a plan and schedule for maintaining more consistent compliance with the turbidity requirements. I recommend that you evaluate what actions you could take to more consistently stay below the turbidity limits, irrespective of whether or not an order is issued.

In addition, my understanding is that you will still be taking the actions described in your e-mail (continue to post notices, flush the system once the CFE turbidity is restored to normal levels, etc). Please note that system pressure should be maintained during the process of flushing the potable system. Loss of system pressure can be considered an emergency event (requiring an emergency order) because contamination can leach into the lines once they are depressurized. As a result, we almost never recommend it.

Please let me know if you have any questions.

Thanks!

Jake

Jake Crosby, PE | Environmental Engineer
Safe Drinking Water Program | USEPA Region 8 | 8WP-SDB
1595 Wynkoop St, Denver, CO 80202
303.312.6389

From: Crosby, Jake
Sent: Friday, January 12, 2018 8:30 AM
To: 'Huckfeldt, Hilary' <HHuckfeldt@ciner.us.com>; Schiltz, Tyler <TSchiltz@ciner.us.com>
Cc: McCully, Jack <JMcCully@ciner.us.com>; Green, Kevin <kgreen@ciner.us.com>
Subject: RE: Ciner turbidity exceedance

Hi Hilary,

Thank you for the update and for sending these readings – this helps a lot. It looks like things did improve a little since I talked with Tyler yesterday afternoon.

I'll talk to you soon!

Thanks!

Jake

Jake Crosby, PE | Environmental Engineer
Safe Drinking Water Program | USEPA Region 8 | 8WP-SDB
1595 Wynkoop St, Denver, CO 80202
303.312.6389

From: Huckfeldt, Hilary [<mailto:HHuckfeldt@ciner.us.com>]
Sent: Friday, January 12, 2018 8:26 AM
To: Crosby, Jake <Crosby.Jake@epa.gov>; Schiltz, Tyler <TSchiltz@Ciner.us.com>
Cc: McCully, Jack <JMcCully@Ciner.us.com>; Green, Kevin <kgreen@ciner.us.com>
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Hilary M. Huckfeldt
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Sent: Thursday, January 11, 2018 4:42 PM
To: Schiltz, Tyler <TSchiltz@Ciner.us.com>
Cc: Huckfeldt, Hilary <HHuckfeldt@ciner.us.com>; McCully, Jack <JMcCully@Ciner.us.com>
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