

REPORT

Annual Groundwater Monitoring Report – 2024

Active Coal Combustion Residuals Landfill Escalante Station Prewitt, New Mexico

Submitted to:

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Submitted by:

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Executive Summary

This report summarizes the groundwater monitoring activities and results for the 2024 detection monitoring program for the active coal combustion residuals (CCR) landfill at Escalante Station, along with the comparative statistical analysis. The active CCR landfill, which is owned and operated by Tri-State Generation and Transmission Association, Inc., is currently in detection monitoring, and no program transitions occurred in 2024.

No verified statistically significant increases were identified from the 2024 detection monitoring program. The total recoverable boron concentration and the fluoride concentration in the sample collected from TRcpc-17 during the second semi-annual 2024 sampling event exceeded the respective non-parametric prediction limits and were identified as potential exceedances. Confirmatory resampling was conducted for these potential exceedances on December 18, 2024, and the results are pending at the time of this reporting. Review and statistical analysis of these confirmatory resampling results will be completed in the first quarter of 2025.

As described in the Groundwater Monitoring System Certification (Golder 2017) and the Groundwater Statistical Method Certification (Golder 2020), the groundwater monitoring and analytical procedures for the program meet the requirements of 40 CFR 257 Subpart D (the CCR Rule). Modifications to the monitoring network and sampling program are not necessary at this time.

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FIGURES

Figure 1: Monitoring Well Locations and Static Water Elevations (First Semi-Annual 2024 Sampling Event) Figure 2: Monitoring Well Locations and Static Water Elevations (Second Semi-Annual 2024 Sampling Event)

1.0 INTRODUCTION

WSP USA Inc. (WSP) has prepared this report to describe the 2024 groundwater monitoring activities and comparative statistical analysis for the active coal combustion residuals (CCR) landfill at Escalante Station (the site), which is owned and operated by Tri-State Generation and Transmission Association, Inc. (Tri-State) and subject to regulation under 40 CFR 257 Subpart D (the CCR Rule). This report was written to meet the requirements of 40 CFR 257.90(e).

1.1 Facility Information

Escalante Station is a retired 270-megawatt coal-fired electric generation facility located near Prewitt, New Mexico. The generating unit was retired in August 2020. The active CCR landfill at the site contains fly ash, bottom ash, and flue gas desulfurization solids (scrubber solids).

1.2 Purpose

The CCR Rule establishes specific requirements for reporting of groundwater monitoring activities and corrective action in 40 CFR 257.90. Per 40 CFR 257.90(e), no later than January 31, 2018, and annually thereafter, owners or operators of CCR units must prepare an annual groundwater monitoring and corrective action report.

2.0 GROUNDWATER MONITORING PROGRAM STATUS

The groundwater monitoring system for the active CCR landfill at Escalante Station consists of six monitoring wells, as described in the Groundwater Monitoring System Certification (Golder 2017). The two upgradient monitoring wells are TRcpc-1 and TRcpc-2. The four downgradient monitoring wells are TRcpc-15, TRcpc-16, TRcpc-17, and TRcpc-18.

2.1 Completed Key Actions in 2024

The following key actions were completed in 2024:

- The 2023 Annual Groundwater Monitoring Report (WSP 2024) was finalized and placed within the operating record and on Tri-State's publicly accessible CCR website.
- The first semi-annual 2024 sampling event was performed in the second quarter, on April 24 and 30.
- The second semi-annual 2024 sampling event was performed in the fourth quarter, on October 2 and 3.
- Confirmatory resampling was conducted on December 18 for the potential exceedances identified from the second semi-annual 2024 sampling event.

2.2 Installation and Decommissioning of Monitoring Wells

No monitoring wells were installed or decommissioned for the active CCR landfill at Escalante Station in 2024.

2.3 **Problems and Resolutions**

No problems were identified in 2024.

2.4 **Proposed Key Activities for 2025**

The following key actions are expected to be completed in 2025:

- Sampling events for detection monitoring are planned to occur in the second and fourth quarters of 2025.
- Review and statistical analysis of the results from the confirmatory resampling conducted on December 18, 2024, for the potential exceedances identified from the second semi-annual 2024 sampling event will be completed in the first quarter of 2025.

3.0 GROUNDWATER MONITORING RESULTS AND ANALYSIS

Results from the groundwater monitoring program in 2024 are described in this section.

3.1 Groundwater Flow

The static water level was measured in each monitoring well prior to purging during each sampling event. Static water elevations are presented in Table 1 through Table 6. Static water elevations from the first semi-annual 2024 sampling event and the second semi-annual 2024 sampling event are shown in Figure 1 and Figure 2, respectively.

Based on the static water elevations in 2024, the groundwater in the Correo sandstone beneath the active CCR landfill generally flows east with a localized northerly flow component.

The groundwater flow rate was estimated with the equation:

$$V_s = k \times i/n_e$$
 Equation 1

where:

- V_s is the groundwater flow rate, in feet per day (ft/day).
- *k* is the hydraulic conductivity, estimated to range from 0.00296 to 12.7 from site pumping test data, in ft/day.
- *i* is the hydraulic gradient calculated by dividing the difference between static water elevations in TRcpc-1 and TRcpc-16 by the horizontal distance between these monitoring wells, in feet per foot (ft/ft).
- n_e is the effective porosity, estimated to be 0.33 based on historical testing results for samples of Correo Sandstone obtained on site.

Groundwater flow velocity estimates range from 0.00005 ft/day to 0.19 ft/day for the first and second semi-annual 2024 sampling events.

3.2 Monitoring Data (Analytical Results)

Analytical results from detection monitoring in 2024 are shown in Table 1 through Table 6.

3.3 Samples Collected

The sampling events for detection monitoring were conducted in April 2024 (first semi-annual 2024 sampling event) and October 2024 (second semi-annual 2024 sampling event). Confirmatory resampling was conducted on December 18, 2024, for the potential exceedances identified from the second semi-annual 2024 sampling event, and the results are pending at the time of this reporting.

3.4 Comparative Statistical Analysis

The comparative statistical analysis is summarized in this section, and the results are presented in Table 7 through Table 12. A full description of the steps taken for the comparative statistical analysis can be found in the Groundwater Statistical Method Certification (Golder 2020).

3.4.1 Definitions

The following definitions are used in discussion of the comparative statistical analysis:

- SSI—is a statistically significant increase and is defined as an analytical result that exceeds the parametric or non-parametric statistical limit established by the baseline statistical analysis.
- Potential exceedance—is defined as an initial analytical result that exceeds the parametric or non-parametric statistical limit established by the baseline statistical analysis. Confirmatory resampling is used to determine whether the potential exceedance is a false positive SSI or a verified SSI.
- False positive SSI—is defined as an analytical result that exceeds the statistical limit but can clearly be attributed to laboratory error or changes in analytical precision or is invalidated through confirmatory resampling.
- Confirmatory resampling—is designated as the resampling event that occurs within 90 days of identifying an SSI over the statistical limit for determination of a verified SSI¹.
- Verified SSI—is interpreted as two consecutive SSIs (the original sample and the confirmatory resample for analytical results) for the same constituent at the same monitoring well.

If the data are assessed with a trend test, confirmatory resampling is generally not applicable, and a verified SSI is defined as a statistically significant increasing trend in the eight most recent results.

3.4.2 Potential Exceedances

No potential exceedances were identified from the first semi-annual 2024 sampling event.

The total recoverable boron and fluoride concentrations in the second semi-annual 2024 sample collected from TRcpc-17 were greater than the non-parametric prediction limits and were identified as potential exceedances. A confirmatory resample was collected from TRcpc-17 on December 18, 2024. The results of the confirmatory resampling are pending at the time of this reporting. Review and statistical analysis of these results will be completed in the first quarter of 2025.

3.4.3 False Positive Statistically Significant Increases

No false positive SSIs were identified from the 2024 detection monitoring program.

3.4.4 Verified Statistically Significant Increases

No verified SSIs were identified from the 2024 detection monitoring program.

¹ Confirmatory resampling may not occur within 90 days of the sampling event that resulted in the potential exceedance because of the additional time required for activities that must occur before a potential exceedance can be identified. These include sample delivery, analytical testing, review of results, and comparative statistical analysis.

4.0 **PROGRAM TRANSITIONS**

In the third quarter of 2017, the groundwater monitoring program for the active CCR landfill at Escalante Station transitioned from the baseline period to detection monitoring. The facility remains in detection monitoring, and no program transitions occurred in 2024.

4.1 Detection Monitoring

Samples for the detection monitoring program are collected on a semi-annual basis, beginning with the samples collected on August 31, 2017. Tri-State plans to collect semi-annual samples for the detection monitoring program in the second and fourth quarters of 2025.

4.2 Assessment Monitoring

The groundwater monitoring program for the active CCR landfill at Escalante Station is not in assessment monitoring. Assessment monitoring has not been triggered as described in 40 CFR 257.95. As such, no alternative source demonstrations have been made under an assessment monitoring program, and no actions are required.

4.3 Corrective Measures and Assessment

The groundwater monitoring program for the active CCR landfill at Escalante Station does not indicate the need for corrective measures. An assessment of corrective measures, as described in 40 CFR 257.96, is not required.

5.0 RECOMMENDATIONS AND CLOSING

This report describes the groundwater monitoring activities and results for the 2024 detection monitoring program for the active CCR landfill at Escalante Station, along with the comparative statistical analysis. The significant findings from the 2024 monitoring activities and comparative statistical analysis are as follows:

- Potential exceedances for total recoverable boron and fluoride at TRcpc-17 were identified for the second semi-annual 2024 sampling event. A confirmatory resample was collected on December 18, 2024. The results of the confirmatory resampling are pending at the time of this reporting. Review and statistical analysis of these results will be completed in the first quarter of 2025.
- No other potential exceedances or false positive SSIs were identified for the 2024 detection monitoring program.

As described in the Groundwater Monitoring System Certification (Golder 2017) and the Groundwater Statistical Method Certification (Golder 2020), the groundwater monitoring and analytical procedures meet the requirements of the CCR Rule. Modifications to the monitoring network and sampling program are not necessary at this time.

Signature Page

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https://wsponlinenam.sharepoint.com/sites/us-tirstategroundwater/shared documents/project files/escalante ccr/2024 escalante/6_deliverables/002-rpt-2024_annual_groundwater_monitoring/rev0/31403149.3784-002-rpt-0-2024_annual_groundwater_monitoring_report_27jan25.docx

6.0 **REFERENCES**

- Golder (Golder Associates Inc.). 2017. Active Coal Combustion Residuals Landfill Groundwater Monitoring System Certification, Escalante Generating Station. Report prepared for Tri-State Generation and Transmission Association, Inc. October 13.
- Golder. 2020. Active Coal Combustion Residuals Landfill Groundwater Statistical Method Certification, Escalante Generating Station. Report prepared for Tri-State Generation and Transmission Association, Inc. June 29.
- WSP (WSP USA Inc.). 2024. Annual Groundwater Monitoring Report 2023, Active Coal Combustion Residuals Landfill, Escalante Station. Report prepared for Tri-State Generation and Transmission Association, Inc. January 27.

Tables

Table 1: Sample Results Summary Table – TRcpc-1

Analytes	Units	Compliance Point (4/24/2024)	Compliance Point (10/2/2024)
Static Water Elevation	ft amsl	6861.0	6861.6
Appendix III			
Boron, Total Recoverable	mg/L	1.5 B	1.7
Calcium, Total Recoverable	mg/L	12	13
Chloride	mg/L	580	560 B
Fluoride	mg/L	1.3	1.4
pH, Field-Measured	pH units	8.3	8.5
Sulfate	mg/L	780	780
Total Dissolved Solids	mg/L	2600	2500

NOTES:

ft amsl: feet above mean sea level

mg/L: milligrams per liter



Table 2: Sample Results Summary Table – TRcpc-2

Analytes	Units	Compliance Point (4/24/2024)	Compliance Point (10/2/2024)
Static Water Elevation	ft amsl	6851.0	6851.7
Appendix III			
Boron, Total Recoverable	mg/L	1.4 B	1.6
Calcium, Total Recoverable	mg/L	13	15
Chloride	mg/L	1100	1100 B
Fluoride	mg/L	1.6	1.6
pH, Field-Measured	pH units	8.1	8.3
Sulfate	mg/L	510	500
Total Dissolved Solids	mg/L	2700	2800

NOTES:

ft amsl: feet above mean sea level

mg/L: milligrams per liter



Table 3: Sample Results Summary Table – TRcpc-15

Analytes	Units	Compliance Point (4/30/2024)	Compliance Point (10/3/2024)
Static Water Elevation	ft amsl	6828.8	6828.9
Appendix III			
Boron, Total Recoverable	mg/L	1.4	1.5 B
Calcium, Total Recoverable	mg/L	6.0 B	6.0
Chloride	mg/L	580	580
Fluoride	mg/L	2.7	2.9
pH, Field-Measured	pH units	8.2	8.4
Sulfate	mg/L	210	230
Total Dissolved Solids	mg/L	1600	1600

NOTES:

ft amsl: feet above mean sea level

mg/L: milligrams per liter



Table 4: Sample Results Summary Table – TRcpc-16

Analytes	Units	Compliance Point (4/30/2024)	Compliance Point (10/3/2024)
Static Water Elevation	ft amsl	6827.7	6828.1
Appendix III			
Boron, Total Recoverable	mg/L	1.4	1.6 B
Calcium, Total Recoverable	mg/L	4.3 B	4.5
Chloride	mg/L	430	440
Fluoride	mg/L	3.6	3.8
pH, Field-Measured	pH units	8.5	8.5
Sulfate	mg/L	210	230
Total Dissolved Solids	mg/L	1400	1400

NOTES:

ft amsl: feet above mean sea level

mg/L: milligrams per liter



Table 5: Sample Results Summary Table – TRcpc-17

Analytes	Units	Compliance Point (4/30/2024)	Compliance Point (10/3/2024)
Static Water Elevation	ft amsl	6830.5	6830.6
Appendix III			
Boron, Total Recoverable	mg/L	1.4	1.6 B
Calcium, Total Recoverable	mg/L	15 B	14
Chloride	mg/L	1400	1200
Fluoride	mg/L	2.3	2.8
pH, Field-Measured	pH units	8.1	8.3
Sulfate	mg/L	270	270
Total Dissolved Solids	mg/L	2800	2600

NOTES:

ft amsl: feet above mean sea level

mg/L: milligrams per liter



Table 6: Sample Results Summary Table – TRcpc-18

Analytes	Units	Compliance Point (4/30/2024)	Compliance Point (10/3/2024)
Static Water Elevation	ft amsl	6840.9	6842.3
Appendix III			
Boron, Total Recoverable	mg/L	0.77	0.79 B
Calcium, Total Recoverable	mg/L	3.3 B	3.2
Chloride	mg/L	370	350
Fluoride	mg/L	1.3	1.5
pH, Field-Measured	pH units	9.7	9.8
Sulfate	mg/L	170	160
Total Dissolved Solids	mg/L	1100	1100

NOTES:

ft amsl: feet above mean sea level

mg/L: milligrams per liter



Table 7: Statistics Summary Table – TRcpc-1

		Selected	Statistical Limit	Quarter 2		Quarter 4		
Analytes	Units	Statistical Method		Compliance Point (4/24/2024)	SSI Determination	Compliance Point (10/2/2024)	SSI Determination	
Appendix III								
Boron, Total Recoverable	mg/L	NP-PL	1.7	1.5 B	No	1.7	No	
Calcium, Total Recoverable	mg/L	NP-PL	13	12	No	13	No	
Chloride	mg/L	P-PL	701	580	No	560 B	No	
Fluoride	mg/L	NP-PL	1.8	1.3	No	1.4	No	
pH, Field-Measured	pH units	P-PL	7.4, 9.4	8.3	No	8.5	No	
Sulfate	mg/L	P-PL	939	780	No	780	No	
Total Dissolved Solids	mg/L	NP-PL	3200	2600	No	2500	No	

NOTES:

P-PL: Parametric Prediction Limit

NP-PL: Non-parametric Prediction Limit

mg/L: milligrams per liter

Table 8: Statistics Summary Table – TRcpc-2

		Selected	Statistical Limit	Quarter 2		Quarter 4			
Analytes	Units	Statistical Method		Compliance Point (4/24/2024)	SSI Determination	Compliance Point (10/2/2024)	SSI Determination		
Appendix III									
Boron, Total Recoverable	mg/L	NP-PL	1.6	1.4 B	No	1.6	No		
Calcium, Total Recoverable	mg/L	NP-PL	16	13	No	15	No		
Chloride	mg/L	NP-PL	1200	1100	No	1100 B	No		
Fluoride	mg/L	P-PL	2.4	1.6	No	1.6	No		
pH, Field-Measured	pH units	P-PL	7.6, 8.9	8.1	No	8.3	No		
Sulfate	mg/L	P-PL	623	510	No	500	No		
Total Dissolved Solids	mg/L	NP-PL	2900	2700	No	2800	No		

NOTES:

P-PL: Parametric Prediction Limit

NP-PL: Non-parametric Prediction Limit

mg/L: milligrams per liter

Table 9: Statistics Summary Table – TRcpc-15

		Selected	Statistical Limit	Quarter 2		Quarter 4			
Analytes	Units	Statistical Method		Compliance Point (4/30/2024)	SSI Determination	Compliance Point (10/3/2024)	SSI Determination		
Appendix III									
Boron, Total Recoverable	mg/L	NP-PL	1.5	1.4	No	1.5 B	No		
Calcium, Total Recoverable	mg/L	Trend ⁽¹⁾	NL	6.0 B	No	6.0	No		
Chloride	mg/L	P-PL	619	580	No	580	No		
Fluoride	mg/L	NP-PL	3.0	2.7	No	2.9	No		
pH, Field-Measured	pH units	Trend ⁽¹⁾	NL	8.2	No	8.4	No		
Sulfate	mg/L	P-PL	281	210	No	230	No		
Total Dissolved Solids	mg/L	NP-PL	2200	1600	No	1600	No		

NOTES:

NL: Statistical limit was not calculated for analytes for which the Sen's Slope methodology was selected

P-PL: Parametric Prediction Limit

NP-PL: Non-parametric Prediction Limit

mg/L: milligrams per liter

B: Analyte was detected in the laboratory quality control blank and the sample

Table 10: Statistics Summary Table – TRcpc-16

		Selected	Statistical Limit	Quarter 2		Quarter 4			
Analytes	Units	Statistical Method		Compliance Point (4/30/2024)	SSI Determination	Compliance Point (10/3/2024)	SSI Determination		
Appendix III									
Boron, Total Recoverable	mg/L	NP-PL	1.6	1.4	No	1.6 B	No		
Calcium, Total Recoverable	mg/L	Trend ⁽¹⁾	NL	4.3 B	No	4.5	No		
Chloride	mg/L	P-PL	545	430	No	440	No		
Fluoride	mg/L	P-PL	4.2	3.6	No	3.8	No		
pH, Field-Measured	pH units	Trend ⁽¹⁾	NL	8.5	No	8.5	No		
Sulfate	mg/L	Trend ⁽¹⁾	NL	210	No	230	No		
Total Dissolved Solids	mg/L	Trend ⁽¹⁾	NL	1400	No	1400	No		

NOTES:

NL: Statistical limit was not calculated for analytes for which the Sen's Slope methodology was selected

P-PL: Parametric Prediction Limit

NP-PL: Non-parametric Prediction Limit

mg/L: milligrams per liter

B: Analyte was detected in the laboratory quality control blank and the sample

Table 11: Statistics Summary Table – TRcpc-17

		Selected	Statistical Limit	Quarter 2		Quarter 4			
Analytes	Units	Statistical Method		Compliance Point (4/30/2024)	SSI Determination	Compliance Point (10/3/2024)	SSI Determination		
Appendix III									
Boron, Total Recoverable	mg/L	NP-PL	1.5	1.4	No	1.6 B	Potential Exceedance		
Calcium, Total Recoverable	mg/L	Trend ⁽¹⁾	NL	15 B	No	14	No		
Chloride	mg/L	NP-PL	1700	1400	No	1200	No		
Fluoride	mg/L	NP-PL	2.7	2.3	No	2.8	Potential Exceedance		
pH, Field-Measured	pH units	NP-PL	8.0, 8.8	8.1	No	8.3	No		
Sulfate	mg/L	Trend ⁽¹⁾	NL	270	No	270	No		
Total Dissolved Solids	mg/L	P-PL	3571	2800	No	2600	No		

NOTES:

NL: Statistical limit was not calculated for analytes for which the Sen's Slope methodology was selected

P-PL: Parametric Prediction Limit

NP-PL: Non-parametric Prediction Limit

mg/L: milligrams per liter

B: Analyte was detected in the laboratory quality control blank and the sample

Table 12: Statistics Summary Table – TRcpc-18

		Selected		Quarte	er 2	Quarte	er 4
Analytes	Units	Statistical Method	Statistical Limit	Compliance Point (4/30/2024)	SSI Determination	Compliance Point (10/3/2024)	SSI Determination
Appendix III						-	
Boron, Total Recoverable	mg/L	P-PL	0.93	0.77	No	0.79 B	No
Calcium, Total Recoverable	mg/L	NP-PL	6.2	3.3 B	No	3.2	No
Chloride	mg/L	NP-PL	380	370	No	350	No
Fluoride	mg/L	Trend ⁽¹⁾	NL	1.3	No	1.5	No
pH, Field-Measured	pH units	Trend ⁽¹⁾	NL	9.7	No	9.8	No
Sulfate	mg/L	NP-PL	250	170	No	160	No
Total Dissolved Solids	mg/L	Trend ⁽¹⁾	NL	1100	No	1100	No

NOTES:

NL: Statistical limit was not calculated for analytes for which the Sen's Slope methodology was selected

P-PL: Parametric Prediction Limit

NP-PL: Non-parametric Prediction Limit

mg/L: milligrams per liter

B: Analyte was detected in the laboratory quality control blank and the sample

Figures



FEET

SCALE

LEGEND

TRcpc-1 GW EL. GW EL.

DOWNGRADIENT CCR NETWORK WELL

UPGRADIENT CCR NETWORK WELL

POTENTIOMETRIC SURFACE CONTOUR

NOTE(S)

- 1. STATIC WATER LEVELS AT TRcpc-1, TRcpc-2, TRcpc-15, TRcpc-16, TRcpc-17, AND TRcpc-18 WERE MEASURED IN APRIL 2024.
- STATIC WATER ELEVATIONS ARE IN FEET ABOVE SEA LEVEL.
 POTENTIOMETRIC SURFACE CONTOURS WERE APPROXIMATED BASED ON STATIC WATER ELEVATIONS IN THE NETWORK WELLS SHOWN AND ADDITIONAL SITE WELLS.

CLIENT TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION 1100 WEST 116TH AVENUE WESTMINSTER, COLORADO 80234 CONSULTANT YYYY-MM-DD 2025-01-23 DESIGNED BJP PREPARED ZJ REVIEWED SAH APPROVED JEO

AERIAL IMAGE: GOOGLE EARTH, CAPTURED BY AIRBUS ON JULY 14, 2023.

PROJECT	
ACTIVE COAL COMBUST	ION RESIDUALS LANDFILL
2024 ANNUAL GROUNDV	VATER MONITORING REPORT
TITLE	
MONITORING WELL LOC ELEVATIONS (FIRST SEI	ATIONS AND STATIC WATER MI-ANNUAL 2024 SAMPLING EV
	MI-ANNUAL 2024 SAMPLING EV



FEET

SCALE

LEGEND

TRcpc-1 GW EL.

GW EL.

NOTE(S)

- 1. STATIC WATER LEVELS AT TRcpc-1, TRcpc-2, TRcpc-15, TRcpc-16, TRcpc-17, AND TRcpc-18 WERE MEASURED IN OCTOBER 2024.
- STATIC WATER ELEVATIONS ARE IN FEET ABOVE SEA LEVEL.
 POTENTIOMETRIC SURFACE CONTOURS WERE APPROXIMATED BASED ON STATIC WATER ELEVATIONS IN THE NETWORK WELLS SHOWN AND ADDITIONAL SITE WELLS.



DOWNGRADIENT CCR NETWORK WELL

UPGRADIENT CCR NETWORK WELL



AERIAL IMAGE: GOOGLE EARTH, CAPTURED BY AIRBUS ON JULY 14, 2023.

2024 ANNUAL GROUNDWATER MONITORING	
	REPORT
MONITORING WELL LOCATIONS AND STATI ELEVATIONS (SECOND SEMI-ANNUAL 2024	C WATER SAMPLING EVE

