

State of Utah

SPENCER J. COX Governor

DEIDRE HENDERSON Lieutenant Governor

# Department of Environmental Quality

Kimberly D. Shelley Executive Director

DIVISION OF WATER QUALITY Erica Brown Gaddis, PhD Director

# MEMORANDUM

TO:	Lonnie Shull III, Permit Writer
FROM:	Chris Bittner, Standards Coordinator
DATE:	April 3, 2021
SUBJECT:	Level I Antidegradation Review for Compass Minerals Permit Renewal UT0000647

**Outfall 001.** No substantive changes are observed for the effluents from Outfall 001 that would affect the conclusions that the effluent limits from the previous permit will protect the uses of Great Salt Lake (R317-2-6.5).

# Outfalls 006, 007, and 008

Compass operates several outfalls for mineral return flows. The primary purpose of mineral return flows is to return the leftover salts in the evaporation ponds back to the Great Salt Lake. Water from Bear River Bay is conveyed to the various evaporation ponds and then back to Bear River Bay. The immediate receiving waters for the return flows are bound by railroad bridges to the north and south and are informally known as the Trapezoid (Figure 1). The Trapezoid is designated as Bear River Bay (R317-2-6.5.c.). However, the water quality characteristics of the Trapezoid are much more similar to Gilbert Bays south of the Union Pacific bridge than Bear River Bay upstream of the bridge that forms the northern boundary of the Trapezoid. This bridge is located at a land constriction where the dominant flow direction is from north to south and fresher to more saline. As indicated by the elevated salinity in the Trapezoid relative to upstream, more saline Gilbert Bay waters regularly influence the Trapezoid.

Compass Minerals does not add any substances to the evaporation ponds. All the substances in the return flows originated from the Lake. The primary purpose of the monitoring conducting during the mineral return flows is to confirm that the Narrative Standards (R317-2-7.2) are met. The results of the monitoring were reviewed to ensure that existing uses are protected (Level I antidegradation review; R317-2-3).

Figure 1 shows the monitoring locations for the mineral return flows. In addition to the return flow monitoring at Outfalls 006, 007 and 008, the receiving waters directly affected by return

Page 2

flows (Mid Trapezoid) and locations that represent ambient conditions for the Lake (Background North, GSL-NE and South Promontory Point) were also monitored.

Prior to 2017, the analyses for the mineral return samples were provided by the Geosciences laboratory at the University of Utah. Beginning in 2017, Brooks Applied Laboratories provided the analyses. In 2018, the samples were split between the University of Utah and Brooks Applied laboratories. The splits were analyzed to verify that the Brooks Applied Laboratory data were comparable to the University of Utah. Comparability is one of the EPA-recommended data quality objectives in addition to precision, accuracy, and completeness.

The tables presented on pages 10 through 13 provide the analytical results for 2017 return flow monitoring. The results for 2018, 2019, and 2020 are provided in the tables beginning on page 14. The results from the two laboratories for arsenic, lead, manganese and mercury are generally comparable whereas the results for cadmium, copper, nickel, selenium and zinc are generally different. The causes of the differences are unknown. Figures 2 and 3 illustrate these observations for results from the two laboratories for the GSL NE and Outfall 006 sample locations, respectively.

The general trends observed in concentrations over time are similar regardless of analyte. As expected, concentrations for the mineral return flows from Outfall 006 generally decrease over time (Figure 3). Based on the currently available information, the Brooks Applied Laboratory data are presumed to be the most representative because of completeness, more rigorous quality control documentation, and because DWQ has previously observed positive interferences with Great Salt Lake selenium analyses from the University of Utah laboratory.

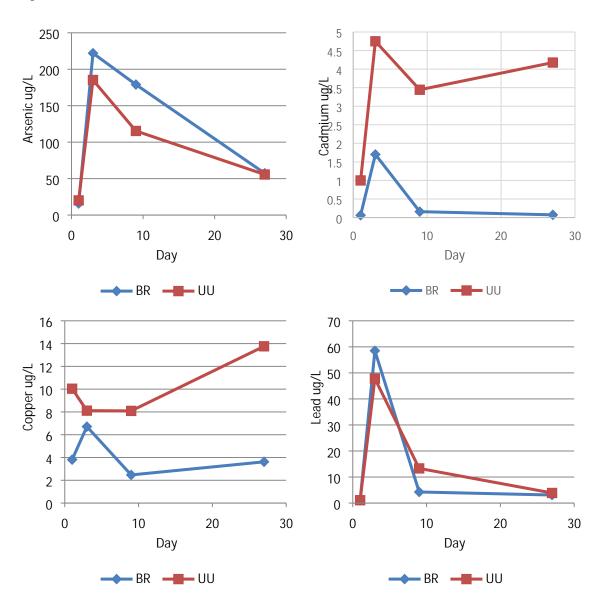
Figure 4 compares the concentrations observed at Outfall 006, Mid Trapezoid and GSL NE sample locations from the fall, 2018. These results are similar to the other years of mineral return flows. The fall 2018 results show that arsenic, mercury, nickel, selenium and zinc are initially present in the mineral return flows at concentrations 3 to 7 times greater than ambient waters in Gilbert Bay but by Day 27 the concentrations decreased to close to ambient concentrations. If the maximum concentrations are screened against Utah Class 3D freshwater criteria (Table 2.14.2, R317-2-14), only the arsenic and mercury screening criteria are exceeded. The rapid assimilation demonstrated by comparing the analytical results from the Outfall 006 to the Mid Trapezoid and GSL NE sample locations and the limited bird use documented by the Jacobs Engineering 2017-2018 bird survey supports that the mineral return flows are unlikely to adversely impact the designated uses of the receiving waters. These results also support that seasonal restrictions for the mineral return flows are unnecessary.

Monitoring is recommended to continue until return flows for all different return flow conditions and ponds have been characterized. The currently available results support that monitoring beyond about Day 28 of the return flows is unnecessary because concentrations approach ambient concentrations. At minimum, arsenic, mercury, nickel, selenium and zinc should be retained as target analytes. The summary monitoring and reporting should also include a measure of salinity such as conductivity.

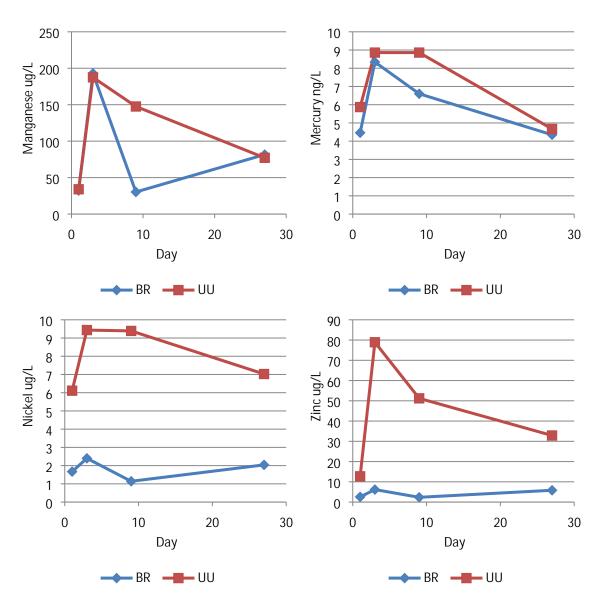


Figure 1. Sampling locations for mineral return flow monitoring, Compass Minerals, Great Salt Lake, Utah

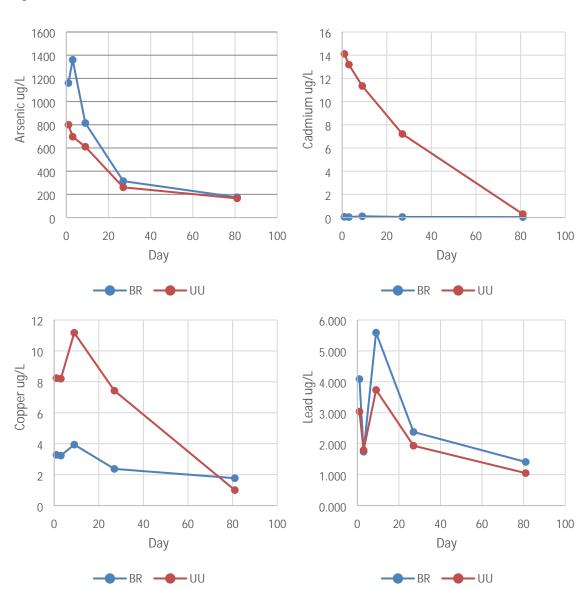






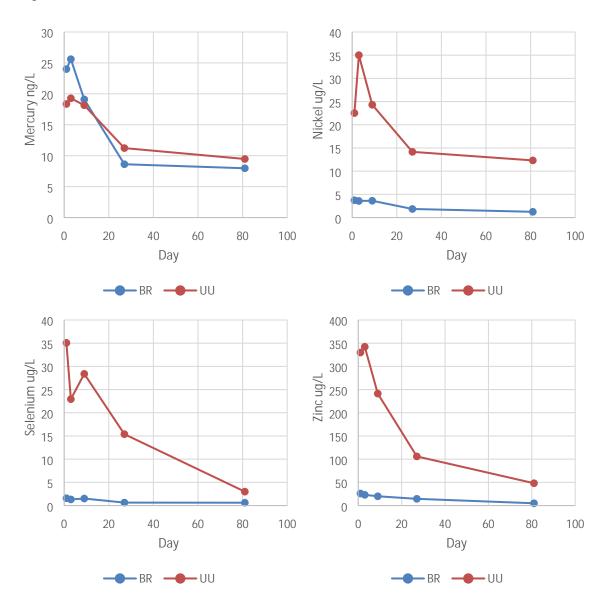


**Figure 2.** Comparisons of analytical results from Brooks Applied Laboratories (BR) and University of Utah Geosciences (UU) laboratories from GSL-NE sample location, November 2018

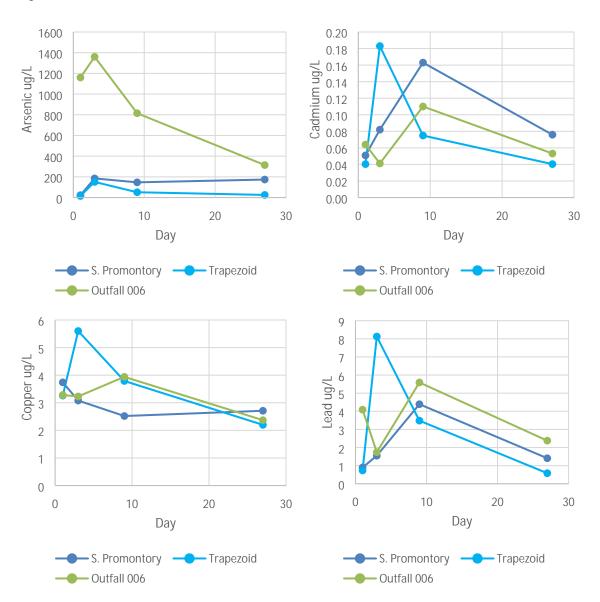


Page 6

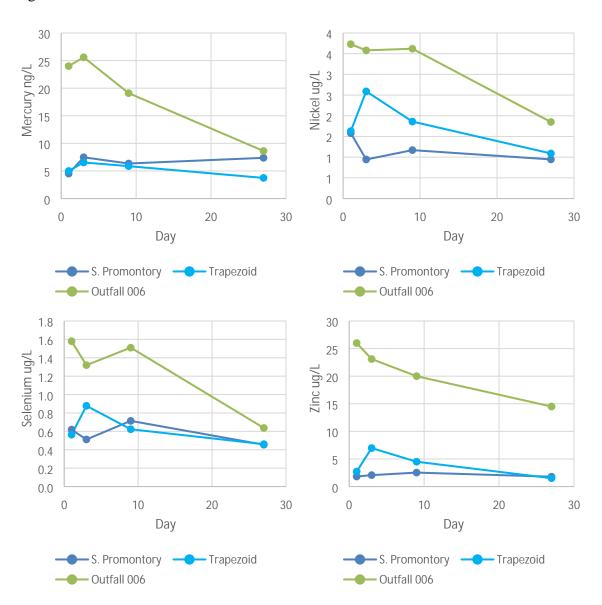
Page 7



**Figure 3.** Comparisons of analytical results from Brooks Applied Laboratories (BR) and University of Utah Geosciences (UU) laboratories from Outfall 006, November 2018



Page 8



**Figure 4.** Comparisons of analytical results from South Promontory, Mid-Trapezoid, and Outfall 006 monitoring locations from the Brooks Applied laboratory for November 2018

# Page 9

				Outfall 006	- Broo	ks Applied l	Labs						
		Day 1		Day 3		Day 3 (Dup	1)	Day 9		Day 27		Day 81	
	Units	11/07/2017 0730		11/09/2017 07	1/09/2017 0730 1			11/18/2017		12/07/2017		01/29/2018	
pН	SU	7.42		7.66		7.70		7.58		7.75		8.14	
Arsenic	μg/L	303		241		244		275		165		93.6	
Barium	µg/L	83.7		101		98.4		80.3		159		77.4	
Cadmium	µg/L	0.0901	J	0.0477	J	0.0585	J	0.0810	J	0.0424	J	0.0593	J
Cobalt	µg/L	1.63		0.944		0.949		1.39		0.713		0.486	
Copper	µg/L	2.64		2.10		1.90		2.74		2.01		2.31	
Iron	µg/L	350		273		186		299		361		186	
Iron	µg/L	461		191		271		219		220		143	
Mercury	ng/L	9.01	J-1	13.1		14.5		7.95		14.4		7.42	
Nickel	μg/L	404		321		314		422		264		223	
Manganese	μg/L	2.71		2.27		2.34		2.88		1.70		1.45	
Lead	μg/L	3.91		2.74		2.69		6.47		2.78		2.81	
Selenium	µg/L	0.830		0.734		0.768		0.917		0.464		0.566	
Zinc	µg/L	13.0		10.2		8.31		16.4		8.95		7.64	

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

J-1: Estimated value. A full explanation is presented in the narrative

U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

		Day 1	Day 3	Day 9	
	Units	03/01/2018 1000	03/02/2018 1700	03/13/2018 0	800
pН	SU	7.56	7.57	7.48	
Arsenic	µg/L	129	147	123	
Barium	µg/L	175	211	211	
Cadmium	µg/L	0.107	0.116	0.0404	U
Cobalt	µg/L	0.366	0.594	0.326	
Copper	µg/L	2.71	5.09	2.92	
Iron	µg/L	165	596	108	
Iron	µg/L	285	821	95.8	
Mercury	ng/L	15.8	37.3	0.66	
Nickel	µg/L	70.2	106	54.4	
Manganese	µg/L	1.37	2.04	1.27	
Lead	µg/L	3.20	3.77	0.165	
Selenium	µg/L	0.515	0.566	0.442	
Zinc	µg/L	6.41	8.53	6.91	

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered J-1: Estimated value. A full explanation is presented in the narrative

U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

			Outfa	all 008 - Brooks A	pplie	ed Labs				
		Day 1		Day 3		Day 9		Day 27	Day 81	
	Units	11/07/2017 0	930	11/08/2017 1700		11/18/2017		12/07/2017	01/29/2018	
рН	SU	7.41		7.51		7.69		7.66	8.02	
Arsenic	µg/L	322		304		200		156	118	
Barium	µg/L	98.9		114				215	117	
Cadmium	µg/L	0.0404	U	0.0605	J	0.0694	J	0.170	0.0617	J
Cobalt	µg/L	0.549		0.515		0.364		0.260	0.271	
Copper	µg/L	2.59		2.84		2.67		2.16	2.92	
Iron	µg/L	86.0		99.6		103		118	69.8	
Iron	µg/L	134	J	64.6		152		77.3	68.6	J
Mercury	ng/L	2.52	J-1	4.08	J-1	5.55		20.2	6.74	
Nickel	µg/L	58.8		62.1		49.0		38.6	21.9	
Manganese	µg/L	1.92		2.13		1.50		1.03	1.02	
Lead	µg/L	1.47		2.45		2.19		3.04	1.50	
Selenium	µg/L	0.923		0.827		0.772		0.549	0.460	

9.66

4.78

10.5

6.19

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

J-1: Estimated value. A full explanation is presented in the narrative

µg/L

U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

14.0

Background North	/ Ambient - Brooks	Applied Labs

		Day 1		Day 3		Day 9	Day 27		Day 81	
	Units	11/06/2017		11/08/2017		11/21/2017	12/06/2017		02/07/2018	
pН	SU	8.80		8.37		8.71	8.66		8.48	
Arsenic	μg/L	3.00		3.40		2.69	3.57		2.01	
Barium	µg/L	69.9		78.6		69.7	81.6		62.7	
Cadmium	µg/L	0.0162		0.0260		0.0193	0.0404	U	0.0648	J
Cobalt	μg/L	0.453		0.637		0.477	0.715		1.17	
Copper	μg/L	2.57		3.48		2.96	4.20		7.49	
Iron	μg/L	1170		1530		1010	1680		2620	
Iron	μg/L	1040		1440		1110	1380		2380	
Mercury	ng/L	1.23	J-1	2.25	J-1	1.63	2.38		3.38	
Nickel	µg/L	1.29		39.9		25.6	38.0		72.9	
Manganese	µg/L	26.9		1.75		1.44	1.98		3.00	
Lead	μg/L	1.19		1.76		1.14	1.71		3.62	
Selenium	μg/L	0.275		0.289		0.337	0.343		0.421	
Zinc	µg/L	9.29		12.3		9.51	18.5		23.6	

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

J-1: Estimated value. A full explanation is presented in the narrative

U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

Zinc

					pezoio	d - Brooks App	plied	l Labs					
		Day 1		Day 3		Day 9		Day 27		Day 81		Day 81 (Du	p 4)
	Units	11/06/2017		11/08/2017		11/21/2017		12/06/2017		02/07/2018		02/07/2018	
рН	SU	8.74		8.60		9.61		8.54		8.49		8.48	
Arsenic	µg/L	4.10		7.41		2.64		3.67		3.80		3.68	
Barium	µg/L	79.0		81.1		80.6		86.7		85.0		69.7	
Cadmium	µg/L	0.0400		0.0354		0.0241		0.0502	J	0.0974	J	0.0521	J
Cobalt	µg/L	0.770		0.723		0.585		0.950		1.50		0.926	
Copper	µg/L	4.28		4.38		3.66		5.89		9.77		6.75	
Iron	µg/L	1880		1810		1300		2190		3430		2220	
Iron	µg/L	1830		1660		1500		2020		3090		1890	
Mercury	ng/L	2.59	J-1	2.94	J-1	1.81		3.33		4.62		2.82	
Nickel	µg/L	54.1		53.0		35.8		63.0		109		62.2	
Manganese	µg/L	2.05		2.00		1.70		2.56		3.88		2.66	
Lead	µg/L	2.39		2.08		1.51		2.89		5.36		2.89	
Selenium	µg/L	0.252		0.290		0.305		0.313		0.402		0.380	
Zinc	µg/L	13.2		13.3		11.1		19.7		29.7		19.7	

J. Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

J-1: Estimated value. A full explanation is presented in the narrative

U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

		Day 1		Day 3		Day 9	Day 9 (Dup 2)	Day 27	Day 81	
	Units	11/06/2017		11/08/2017		11/21/2017	11/21/2017	12/06/2017	02/07/2018	
pН	SU	8.62		8.45		8.43	8.58	8.04	8.39	
Arsenic	µg/L	25.9		56.0		14.5	3.00	14.8	7.09	
Barium	µg/L	89.7		86.1		65.8	83.5	141	58.4	
Cadmium	µg/L	0.0912		0.0362		0.0251	0.0370	0.151	0.0404	U
Cobalt	µg/L	0.563		0.255		0.413	0.748	2.07	0.620	
Copper	µg/L	3.94		1.60		2.88	4.57	14.2	4.99	
Iron	µg/L	1130		269		890	2010	7380	1280	
Iron	µg/L	1120		229		824	1830	4420	1390	
Mercury	ng/L	4.53	J-1	1.99	J-1	2.13	2.43	16.1	2.34	
Nickel	µg/L	37.6		27.7		34.6	49.2	156	40.8	
Manganese	µg/L	1.79		1.03		1.32	2.09	5.19	1.83	
Lead	µg/L	2.51		0.952		1.13	2.13	8.00	1.76	
Selenium	µg/L	0.423		0.456		0.295	0.391	0.366	0.400	
Zinc	µg/L	10.5	1	3.09		8.05	18.1	42.6	14.8	

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

J-1: Estimated value. A full explanation is presented in the narrative

U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

South Promon	tory Point -	<b>Brooks Applied</b>	Labs						-			
		Day 1	Day 3		Day 9		Day 27		Day 27 (Dup	3)	Day 81	
	Units	11/06/2017	11/08/2017		11/21/2017		12/06/2017		12/06/2017		02/07/2018	
pН	SU	not collected	8.27		8.59		8.08		8.10		8.30	
Arsenic	µg/L	not collected	113		0.565	U	114		112		7.29	
Barium	µg/L	not collected	129		67.3		129		141		54.0	
Cadmium	µg/L	not collected	0.0406		0.0142		0.0404	U	0.0588	J	0.0404	U
Cobalt	µg/L	not collected	0.269		0.245		0.311		0.324		0.326	
Copper	µg/L	not collected	2.40		1.59		2.99		3.10	1	2.79	
Iron	µg/L	not collected	230		341		307		304		519	
Iron	µg/L	not collected	196		374		265		202		694	
Mercury	ng/L	not collected	3.76	J-1	1.49		3.65		5.16		1.01	
Nickel	µg/L	not collected	13.8		24.6		32.8		21.6		17.8	
Manganese	µg/L	not collected	1.07		0.952		1.13		1.16		1.12	
Lead	µg/L	not collected	1.10		0.578		1.18		1.34		0.657	
Selenium	µg/L	not collected	0.448		0.0581	U	0.490		0.499		0.371	
Zinc	µg/L	not collected	3.22		3.82		6.02		5.57		7.79	

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

J-1: Estimated value. A full explanation is presented in the narrative U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

## Table 1 - Outfall 006 Mineral Return Data -2018/2019 Mineral Return Season Compass Minerals Ogden, Inc.

						Outfall	006	- Brooks	Appl	ied Labs									
	Units	Day 1		Duplicat	te	Day 3		Day 9	)	Day 27	7	Duplicate	5	Day 81		Last Day	MR	Duplica	ate
		10/27/201	8	10/27/201	18	10/31/20	18	11/05/20	18	11/21/20	18	11/21/201	B	01/17/201	9	3/20/201	9	3/20/20	19
Arsenic	µg/L	1160		1220		1360		815		314		311		175		251		251	
Iron	µg/L	107		96.7		88.6		229		128		143		103		379		395	
Mercury	ng/L	24		23.3		25.6		19.1		8.62		7.34		7.97		30.3		26.7	
Manganese	µg/L	524		460		409		456		197		199		139		356		372	
рН	SU	7.01		7.05		7.04		7.23		7.94		7.95		8.03		9.01	Н	8.98	Н
Selenium	µg/L	1.58		1.52		1.32		1.51		0.637		0.712		0.614		0.711		0.697	
Cadmium	µg/L	0.064	J	0.063		0.0412	J	0.11		0.0532	J	0.0534		0.0404	U	0.150		0.153	
Cobalt	µg/L	1.23		1.21		1.14		1.15		0.452		0.457		0.397		0.680		0.713	
Copper	µg/L	3.28		3.28		3.23		3.94		2.37		2.41		1.77		4.65		4.87	
Nickel	µg/L	3.73		3.69		3.58		3.62		1.85		1.88		1.24		2.04		2.11	
Lead	µg/L	4.09		3.98		1.74		5.59		2.38		2.39		1.41		8.19		8.58	
Zinc	µg/L	26		25.9		23.1		20		14.5		6.93		4.93		9.07		9.31	
Barium	µg/L	816	U	816	U	20.9		816	U	102		99.6		112		150		144	
Iron	µg/L	16300	U	16300	U	108		16300	U	191		187		61.9		296		342	

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

**U:** Result is  $\leq$  the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

H: pH was measured upon arrival by Brooks Applied Labs, but outside of the 48 hour hold time.

Samples were not submitted U of U Labs for the Last of Day of Mineral Return sampling event.

		Ou	tfall 006 - U of	U Geoscience	Lab	Set to c	
		Day 1	Day 3	Day 9	Day 27	Day 81	Last Day MR
	Units	10/27/2018	10/31/2018	11/05/2018	11/21/2018	01/17/2019	3/20/2019
Arsenic	µg/L	800	868	611	261	165	
Iron	µg/L	119	697	275	128	28	
Mercury	ng/L	18.36	19.28	18.16	11.23	9.47	
Manganese	µg/L	493	419	384	205	127	
Selenium	µg/L	35	23	28	15	<3	
Cadmium	µg/L	14	13	11	7	<0.3	
Cobalt	µg/L	25	32	21	9	1	
Copper	µg/L	8	8	11	7	<2	
Nickel	µg/L	23	35	24	14	12	
Lead	µg/L	3	2	4	2	1	
Zinc	µg/L	330	342	241	106	48	
Barium	µg/L	12	23	127	100	98	

Page 14

## Table 2 - Background North Mineral Return Data -2018/2019 Mineral Return Season Compass Minerals Odden, Inc.

		В	ackg	round North	n / Ar	nbient - Bro	oks	Applied Lab	)S			
		Day 1		Day 3		Day 9		Day 27		Day 81	Last Day	/ MR
	Units	10/26/20	18	10/30/201	8	11/05/201	8	11/21/201	18	01/17/2019	3/20/20	19
Arsenic	µg/L	5.43		14.5		11.3		6.87			7.74	
Iron	µg/L	16300	U	379		16300	U	219			845	
Mercury	ng/L	5.11		5.24		12.9		2.80			5.87	
Manganese	µg/L	40.6		39.8		286		20.3			23.5	
pН	SU	8.56		8.72		8.86		8.50			8.03	Н
Selenium	µg/L	0.488		0.626		1.02		0.470			0.595	
Cadmium	µg/L	0.0413	J	0.0404	U	0.341		0.0404	U		0.0404	U
Cobalt	µg/L	0.459		0.357		2.70		0.185			0.483	
Copper	µg/L	3.15		2.68		14.5		1.92			2.63	
Nickel	µg/L	1.74		1.64		7.70		0.993			1.95	
Lead	µg/L	1.53		1.20		13.3		0.653			0.903	
Zinc	µg/L	4.46		3.89		28.6		1.64			5.04	
Barium	µg/L	816	U	74.9		816	U	55.5			65.8	
Iron	µg/L	721		405		5330		194			1180	

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

U: Result is  $\leq$  the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

 $\ensuremath{\text{H:}}\xspace$  pH was measured upon arrival by Brooks Applied Labs, but outside of the 48 hour hold time.

Samples were not submitted U of U Labs for the Last of Day of Mineral Return sampling event.

Samples were not collected from Background North, Mid-Trapezoid, GSL-Northeast, or South Promontory Point for Day 81 due to frozen conditions on the GSL.

		E	Background North	ı - U of U Geosci	ence Lab		
		Day 1	Day 3	Day 9	Day 27	Day 81	Last Day MR
	Units	10/26/2018	10/30/2018	11/05/2018	11/21/2018	01/17/2019	3/20/2019
Arsenic	mg/L	<9	11	14	<9		
Iron	mg/L	599	174	1319	100		
Mercury	ng/L	4.37	4.36	8.79	3.23		
Manganese	mg/L	46	36	96	17		
Selenium	mg/L	<5	<5	<5	<5		
Cadmium	mg/L	<2	<2	<2	<2		
Cobalt	mg/L	<0.9	<0.9	2	1		
Copper	mg/L	6.0	6.3	12.1	5.7		
Nickel	mg/L	2.6	3.0	10.1	3.5		
Lead	mg/L	1.5	1.0	4.2	0.8		
Zinc	mg/L	10.8	15.8	23.3	9.7		
Barium	mg/L	71	75	183	55		

3/2/2021

## Table 3 - Mid Trapezoid Mineral Return Data -2018/2019 Mineral Return Season Compass Minerals Ogden, Inc.

	Mid-Trapezoid - Brooks Applied Labs   Day 1 Day 3 Duplicate Day 9 Day 27 Day 81 Last Day MR														
		Day 1		Day 3		Duplicate	e	Day 9		Day 27		Day 81	Last Day	/ MR	
	Units	10/26/201	8	10/30/201	8	10/30/201	8	11/05/201	8	11/21/201	8	01/17/2019	3/20/20	19	
Arsenic	µg/L	15.2		151		131		51.4		25.4			9.89		
Iron	μg/L	16300	U	849		1100		544		178			738		
Mercury	ng/L	4.93		7.98		8.41		6.11		2.22			4.03		
Manganese	µg/L	36.1		154		163		98.5		32.8			23.5		
pН	SU	8.82		8.19		8.45		8.28		8.45			8.09	Н	
Selenium	µg/L	0.564		0.878		0.809		0.623		0.461			0.472		
Cadmium	μg/L	0.0404	U	0.183		0.187		0.0749	J	0.0404	U		0.0404	U	
Cobalt	μg/L	0.349		0.681		0.773		0.419		0.185			0.430		
Copper	μg/L	3.26		5.60		6.0		3.79		2.20			2.91		
Nickel	µg/L	1.63		2.59		2.85		1.86		1.09			1.77		
Lead	μg/L	0.991		11.5		11.1		3.20		0.731			0.835		
Zinc	µg/L	2.72		6.97		7.92		4.50		1.51			3.81		
Barium	µg/L	816	U	114		105		816	U	70.6			57.6		
Iron	µg/L	369		945		1320		16300	U	104			679		

J: Detected by the instrument, the result is > the MDL but  $\leq$  the MRL. Result is reported and considered an estimate.

**U:** Result is  $\leq$  the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

H: pH was measured upon arrival by Brooks Applied Labs, but outside of the 48 hour hold time.

Samples were not submitted U of U Labs for the Last of Day of Mineral Return sampling event.

Samples were not collected from Background North, Mid-Trapezoid, GSL-Northeast, or South Promontory Point for Day 81 due to frozen conditions on the GSL.

			Mid-Trapez	zoid	- U of U Geos	scie	nce Lab			
		Day 1	Day 3		Day 9		Day 27		Day 81	Last Day MR
	Units	10/26/201	8 10/30/201	8	11/05/2018		11/21/2018		01/17/2019	3/20/2019
Arsenic	µg/L	14.4	94.2		46.0		18.8			
Iron	µg/L	179	705		348		81			
Mercury	ng/L	4.99	6.54		5.87		3.74			
Manganese	µg/L	33	132		96		22			
Selenium	µg/L	<5	<5		<5		<5			
Cadmium	µg/L	<2	2.9		<2		<2			
Cobalt	µg/L	<0.9	3.5		1.8		0.9			
Copper	µg/L	2.7	306.7		8.1		3.5			
Nickel	µg/L	<2	6.7		4.9		2.6			
Lead	µg/L	0.7	8.1		3.5		0.6			
Zinc	µg/L	<6	43.6		33.9		9.0			
Barium	µg/L	112.3	100.0		118.3		67.6			

3/2/2021

### Table 4 - GSL - NE (Formerly known as Background South) Mineral Return Data -2018/2019 Mineral Return Season Compass Minerals Ogden, Inc.

				GSL - North	east	- Brooks /	۱	ed Labs				
		Day 1		Day 3		Day 9		Day 27		Day 81	Last Day	MR
	Units	10/26/20	18	10/30/2018		11/05/201	8	11/21/20	18	01/17/2019	3/20/20	19
Arsenic	µg/L	15.9		222		179		57.3			43.7	
Iron	µg/L	16300	U	517		178		964			564	
Mercury	ng/L	4.46		8.34		6.6		4.35			4.97	
Manganese	µg/L	32.2		193		30.3		81.6			34.6	
Lead	µg/L	1.08		58.5		4.26		3.09			9.05	Н
pН	SU	8.86		8.13		8.03		8.44			0.476	
Selenium	µg/L	0.538		0.983		0.506		0.527			0.0465	J
Cadmium	µg/L	0.0627	J	1.7		0.159		0.0733	J		0.379	
Cobalt	µg/L	0.34		0.602		0.277		0.62			3.40	
Copper	µg/L	3.81		6.71		2.47		3.62			1.61	
Nickel	µg/L	1.67		2.4		1.14		2.04			1.35	
Zinc	µg/L	2.56		6.17		2.35		5.82			3.61	
Barium	µg/L	816	U	117		816	U	80.1			78.5	
Iron	µg/L	321		692		16300	U	563			530	

J: Detected by the instrument, the result is > the MDL but ≤ the MRL Result is reported and considered an estimate.

 $\textbf{U}: \text{Result is} \leq \text{the MDL or client requested reporting limit (CRRL)}. \text{ Result reported as the MDL or CRRL}.$ 

H: pH was measured upon arrival by Brooks Applied Labs, but outside of the 48 hour hold time.

Samples were not submitted U of U Labs for the Last of Day of Mineral Return sampling event.

Samples were not collected from Background North, Mid-Trapezoid, GSL-Northeast, or South Promontory Point for Day 81 due to frozen conditions on the GSL

			Great Salt Lak	e NE - U of U Geos	science Lab		
		Day 1	Day 3	Day 9	Day 27	Day 81	Last Day MR
	Units	10/26/2018	10/30/2018	11/05/2018	11/21/2018	01/17/2019	3/20/2019
Arsenic	µg/L	20	185	115	56		
Iron	μg/L	230	330	356	399		
Mercury	ng/L	5.87	8.86	8.86	4.67		
Manganese	µg/L	34	187	148	77		
Selenium	µg/L	<5	10	<5	<5		
Cadmium	µg/L	<2	5	3	4		
Cobalt	μg/L	<0.9	7	5	3		
Copper	µg/L	10.0	8.1	8.1	13.8		
Nickel	µg/L	6.1	9.4	9.4	7.0		
Lead	µg/L	1.1	47.8	13.3	3.9		
Zinc	µg/L	12.7	78.9	51.2	32.9		
Barium	µg/L	86	110	98	173		

## Table 5 -South Promontory Pt Mineral Return Data -2018/2019 Mineral Return Season Compass Minerals Ogden, Inc.

			S	outh Promo	ontor	y Point - Br	ooks	Applied Lab	)S			
		Day 1		Day 3		Day 9		Day 27		Day 81	Last Day	MR
	Units	10/26/201	8	10/30/201	8	11/05/201	8	11/21/201	8	01/17/2019	3/20/201	9
Arsenic	µg/L	22.8		185		147		174			157	
Iron	µg/L	16300	U	79		188		104			145	
Mercury	ng/L	4.52		7.48		6.35		7.38			8.10	
Manganese	µg/L	29.4		14.5		31.8		19.8			16.7	
рН	SU	8.7		8.16		8.28		8.19			9.03	Η
Selenium	µg/L	0.619		0.512		0.714		0.455			0.536	
Cadmium	µg/L	0.0509	J	0.082	J	0.163		0.0759	J		0.0840	J
Cobalt	µg/L	0.273		0.228		0.293		0.223			0.251	
Copper	µg/L	3.74		3.08		2.52		2.71			4.19	
Nickel	µg/L	1.58		0.944		1.17		0.946			1.07	J
Lead	μg/L	0.9		1.55		4.39		1.41			1.47	
Zinc	µg/L	1.82		2.07		2.53		1.79			3.02	
Barium	µg/L	816	U	133		816	U	131			120	
Iron	µg/L	174		78.5	J	16300	U	86.2	J		131	

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

H: pH was measured upon arrival by Brooks Applied Labs, but outside of the 48 hour hold time.

Samples were not submitted U of U Labs for the Last of Day of Mineral Return sampling event.

Samples were not collected from Background North, Mid-Trapezoid, GSL-Northeast, or South Promontory Point for Day 81 due to frozen conditions on the GSL.

		Sc	outh Promontor	y Point - U of U	Geoscience Lab		
		Day 1	Day 3	Day 9	Day 27	Day 81	Last Day MR
	Units	10/26/2018	10/30/2018	11/05/2018	11/21/2018	01/17/2019	3/20/2019
Arsenic	µg/L	19	154	165	163		
Iron	µg/L	171	168	205	91		
Mercury	ng/L	4.07	6.41	5.29	9.62		
Manganese	µg/L	32	19	36	31		
Selenium	µg/L	<5	6.82	7.69	13.99		
Cadmium	µg/L	<2	7.00	6.44	7.16		
Cobalt	µg/L	<0.9	5.69	4.78	5.93		
Copper	µg/L	6.97	8.83	6.29	4.30		
Nickel	µg/L	3.43	17.3	14.4	18.4		
Lead	µg/L	0.62	1.2	3.2	1.3		
Zinc	µg/L	14.5	48	49	51		
Barium	µg/L	84.2	159	134	141		

3/2/2021

## Table 1a -- Outfall 006

Mineral Return Data - 2019/2020 Mineral Return Season

Compass Minerals Ogden, Inc.

		Outfall 006: 20	19 - 2	020 MR Seas	on							
		Day 1	1		Day 9		Day 27		Last Day MR (Outf 006 only)	all	Last Day I (final retu	
Parameter	Units	10/16/2019		10/16/2019	10/25/2019		11/15/2019	ŝ	12/23/2019		3/30/2020	
Arsenic	µg/L	80.8		853	402	Ĩ	248		525	Ĩ	185	
Barium	µg/L	94.3		57.9	80.2		83.1	Γ	46.6		179	
Cadmium	µg/L	0.0421	J	0.125	0.0936	J	0.0765	J	0.13		0.0842	J
Cobalt	µg/L	0.418		1.44	0.991		0.656	Γ	1.16		0.453	
Copper	µg/L	1.73		3.62	2.47	Î	1.9		3.27	Ϋ́	2.19	
Iron	µg/L	376		301	527		204		229		253	
Iron	µg/L	415		230	282		259		234	,	357	
Mercury	ng/L	3.76		2.56	6.54		3.14	Γ	7.24		17.9	
Manganese	µg/L	37.8		499	373		367		426	2	86	
Nickel	µg/L	1.71		3.75	2.69		1.83		3.24		1.78	
Lead	µg/L	1.28		7.14	5.4		4.1		6.89		3.2	
pН	SU	8.58	Н	7.41	7.77	Н	7.92	Г	7.77		7.56	М
Selenium	µg/L	0.489		1.28	0.821		0.63		0.868		0.548	
Zinc	µg/L	2.89		28.3	14		6.6		28.7		38.2	

J: Detected by the instrument, the result is > the MDL but  $\leq$  the MRL. Result is reported and considered an estimate.

 $\textbf{U}: \texttt{Result} is \leq \texttt{the MDL} \text{ or client requested reporting limit (CRRL)}. \texttt{Result reported as the MDL or CRRL}.$ 

H: pH was measured upon arrival by Brooks Applied Labs, but outside of the 48 hour hold time.

 $\ensuremath{\mathsf{M}}\xspace$  : Duplicate precision (RPD) was not within acceptance critera.

\* The last day of mineral return at Outfall 006 was December 23, 2019. Outfall 006 was briefly reactivated on March 25, 2020 and operated until March 30, 2020.

#### Table 1b -- Outfall 008

### Mineral Return Data - 2019/2020 Mineral Return Season

Compass Minerals Ogden, Inc.

		Outfall 008: 2	2019 - 2	020 MR S	eason						
		Day 1	y k	Day 3		Day 9		Day 27		Last Day N	1R
Parameter	Units	10/16/2019		10/16/201	9	10/25/2019		11/15/201	9	3/30/2020	
Arsenic	µg/L	533		554		234		132		160	
Barium	µg/L	136		142		127		112		193	
Cadmium	µg/L	0.0404	U	0.0404	U	0.134		0.0953	J	0.0477	J
Cobalt	µg/L	0.305		0.303		0.218		0.285		0.549	
Copper	µg/L	2.41		2.47		2.27		1.9		3.52	
Iron	µg/L	29.2	J	24.2	J	57.6		132		181	
Iron	µg/L	36.4	U	36.4	U	36.4	U	156		310	
Mercury	ng/L	6.02		1.39		6.88		4.28		10	
Manganese	µg/L	21.3		23.6		16.9		20.4		73.2	
Nickel	µg/L	1.78		1.83		1.03	J	0.987	J	1.83	
Lead	µg/L	0.161		0.149	J	2.53		1.81		1.92	
рН	SU	7.52	Н	7.55		7.85	н	7.98		7.59	
Selenium	µg/L	1.17		1.05		0.601		0.499		0.539	
Zinc	µg/L	6.89		7.25		3.32	1	1.93		7.84	1

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

H: pH was measured upon arrival by Brooks Applied Labs, but outside of the 48 hour hold time.

A sample was not collected at Outfall 008 for Day 81.

## Table 2 - Background North Mineral Return Data - 2019/2020 Mineral Return Season Compass Minerals Ogden, Inc.

		Backgroun	nd Nor	th: 2019 - 20	020 M R	Season			
		Day 1		Day 3		Day 9		Last Day I	ИR
Parameter	Units	10/16/2019		10/18/2019		10/25/2019	2.55	3/30/2020	
Arsenic	µg/L	11.9		11.2		7.95		5.24	
Barium	µg/L	93.6		120		80.1		75.7	
Cadmium	µg/L	0.0465	J	0.0759	J	0.0427	J	0.0438	J
Cobalt	µg/L	0.675		1.03		0.824		0.933	
Copper	µg/L	2.57		3.99		2.88		3.13	
Iron	µg/L	800	М	2190	М	2640	1	1620	
Iron	µg/L	1110		1670		1360		1740	
Mercury	ng/L	3.11		6.18		2.99		3.67	
Manganese	µg/L	50.1		80.4		54.2		61.8	
Nickel	µg/L	1.98		2.74		2.2		2.76	
Lead	µg/L	2.39		4.26		2.51		2.79	
рН	SU	8.54	Н	8.66		8.76	Н	8.94	
Selenium	µg/L	0.348		0.376		0.286		0.35	
Zinc	µg/L	8.88		13.6		7.35		10.1	

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.

H: pH was measured upon arrival by Brooks Applied Labs, but outside of the 48 hour hold time.

M: Duplicate precision (RPD) was not within acceptance critera.

Samples were not collected from Background North, Mid-Trapezoid, GSL-Northeast, or South Promontory Point for Days 27

and 81 due to inaccessibility of an airboat and conditions on the GSL.

### Table 3 - Mid Trapezoid

## Mineral Return Data - 2019/2020 Mineral Return Season

## Compass Minerals Ogden, Inc.

		Mid-Trape:	zoid :	2019 - 2020 MR	Season			
		Day 1		Day 3	Day 9		Last Day	MR
Parameter	Units	10/16/2019		10/18/2019	10/25/2019		3/30/2020	
Arsenic	µg/L	10.7		13.4	17.5		7.33	
Barium	µg/L	91.5		118	97.8		78.8	
Cadmium	µg/L	0.0404	U	0.109	0.0404	U	0.0806	J
Cobalt	µg/L	0.393		1.35	0.478		1.45	
Copper	µg/L	2.39		5.9	2.13		5.22	
Iron	µg/L	643		2500	2170		2340	
Iron	µg/L	558		2380	631		2820	
Mercury	ng/L	6.67		8.02	2.82		6.47	
Manganese	µg/L	25.2		107	38.4		107	
Nickel	µg/L	1.38	J	3.34	1.54		3.99	
Lead	µg/L	1.34		5.88	1.73		4.92	
рН	SU	8.92	Н	8.88	8.57	н	9.03	
Selenium	µg/L	0.323		0.429	0.35		0.42	
Zinc	µg/L	72.2		13.4	3.89		14.1	

J: Detected by the instrument, the result is > the MDL but  $\leq$  the MRL. Result is reported and considered an estimate.

U: Result is  $\leq$  the MDL or dient requested reporting limit (CRRL). Result reported as the MDL or CRRL.

H: pH was measured upon arrival by Brooks Applied Labs, but outside of the 48 hour hold time.

Samples were not collected from Background North, Mid-Trapezoid, GSL-Northeast, or South Promontory Point for

Days 27 and 81 due to inaccessibility of an airboat and conditions on the GSL.

## Table 4 - GSL - NE (Formerly known as Background South) Mineral Return Data -2019/2020 Mineral Return Season Compass Minerals Ogden, Inc.

GSL Northeast: 2019 - 2020 MR Season Day 1 Day 3 Day 9 Last Day MR 10/16/2019 10/18/2019 10/25/2019 3/30/2020 Parameter Units Arsenic μg/L 13.2 32.6 16.2 51.8 Barium 89.6 90.7 81 µg/L 91.1 0.0404 0.0423 0.0404 υ Cadmium µg/L U J 0.0404 Cobalt 0.36 0.34 0.728 µg/L 0.308 1.95 1.75 2.66 Copper µg/L 1.27 404 378 1880 Iron μg/L 554 516 453 1290 Iron µg/L 273 2.53 Mercury ng/L 3.16 2.16 5.12 Manganese μg/L 26 24.7 50 39.2 µg/L Nickel 1.31 J 1.26 J 2.24 1.18 Lead µg/L 1.33 1.35 2.1 1.06 SU 8.53 8.94 pН 8.6 8.23 н н Selenium µg/L 0.312 0.4 0.414 0.402 Zinc 16.5 2.84 6.56 µg/L 1.91

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL. H: pH was measured upon arrival by Brooks Applied Labs, but outside of the 48 hour hold time. Samples were not collected from Background North, Mid-Trapezoid, GSL-Northeast, or South Promontory Point

for Days 27 and 81 due to inaccessibility of an airboat and conditions on the GSL.

## Table 5 -South Promontory Pt

## Mineral Return Data - 2019/2020 Mineral Return Season

## Compass Minerals Ogden, Inc.

	0.0	South Pron	nonto	ry Point: 201	9 - 202	0 MR Seaso	n		
		Day 1		Day 3		Day 9		Last Day	MR
Parameter	Units	10/16/2019		10/18/2019		10/25/2019		3/30/2020	
Arsenic	µg/L	154		103		59		79.8	
Barium	µg/L	128		112		90.3		95.9	
Cadmium	µg/L	0.0615	J	0.0463	J	0.0404	U	0.447	J
Cobalt	µg/L	0.164		0.299		0.262		0.333	
Copper	µg/L	2.18		2		1.27		2.24	
Iron	µg/L	123		374		409		422	
Iron	µg/L	36.4	U	307	1	199		381	
Mercury	ng/L	4.32		4.06		2.19		4.31	
Manganese	µg/L	16.1		20.6		36.7		26.3	
Nickel	µg/L	0.801	J	1.17	J	1.08	J	1.34	J
Lead	µg/L	1.03		1.33	1	0.854		1.08	
рН	SU	8.2	Н	8.36		8.26	Н	8.67	
Selenium	µg/L	0.57		0.465		0.381		0.488	
Zinc	µg/L	1.21	J	4.78		1.56		4.15	

J: Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.

U: Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL. H: pH was measured upon arrival by Brooks Applied Labs, but outside of the 48 hour hold time. Samples were not collected from Background North, Mid-Trapezoid, GSL-Northeast, or South Promontory Point

for Days 27 and 81 due to inaccessibility of an airboat and conditions on the GSL.