

July 31, 2026

Jonathan Rice, Chief  
Industrial and General Permits Division  
Maryland Department of the Environment  
1800 Washington Boulevard  
Baltimore, Maryland 21230

**RE: Monthly Progress Report – July 2026**  
**Perdue AgriBusiness LLC**  
**AI#2087, State Permit No. 15-DP-0359, NPDES Permit No. MD0000060**  
**6906 Zion Church Road, Salisbury, Maryland 21804**  
**Langan Project No.: 220210101**

Dear Mr. Rice:

Langan Engineering and Environmental Services, LLC (Langan) has prepared this progress report for July 2026 on behalf of Perdue AgriBusiness LLC (PAB) regarding the Zion Church Road (ZCR) facility located at 6906 Zion Church Road in Salisbury, Maryland (the "Facility"). This report was prepared in response to the *Request for Action to Address PFAS in Wastewater* letter issued to PAB on November 8, 2024, by the Maryland Department of the Environment (MDE), Water and Science Administration, Wastewater Pollution Prevention and Reclamation Program.

The MDE's letter contained the following two substantive requests:

1. **Monitoring and Reporting:** *As soon as possible, but no later than 15 days from the date of this letter, collect your first monthly sample at Outfall 001 for PFAS and submit it for testing using EPA Method 1633. Samples shall be collected every month until further notice. Sample results shall be provided to the Department via email to jonathan.rice@maryland.gov no later than 7 days after you receive each lab report.*
2. **Source Identification:** *As soon as possible, but no later than 5 days from the date of this letter, begin a comprehensive assessment of the Facility's processes, materials, and any third-party waste streams to identify sources of PFAS that may enter the Facility's discharges, stormwater runoff, or sludge. Progress reports regarding the evaluation, including any preliminary results or final findings, shall be submitted to the Department on a monthly basis. Monthly reports shall be provided to the Department via email to jonathan.rice@maryland.gov by the final date of each month, with the first report due on November 30, 2024. Based on the findings, a mitigation plan may be necessary to propose a strategy to reduce or to the extent practicable eliminate PFAS-containing materials entering the Facility's wastewater, stormwater runoff, or sludge.*

This monthly progress report provides a summary of per- and polyfluoroalkyl substances (PFAS) monitoring and reporting activities (Section "A" below), a summary of PFAS source assessment activities (Section "B" below), and conclusions (Section "C" below).

## A. Monitoring and Reporting

Langan performed a monthly sampling event on June 3, 2026. Samples of the interim PFAS treatment system influent and effluent (ID WW\_PFAS\_INF\_RO\_C1\_060326 and WW\_PFAS\_EFF\_OOGP\_C1\_060326) were collected as composite-grab samples. The results of this sampling were provided to MDE on July 2, 2026. The total PFAS concentration (defined as the sum of analyzed PFAS compounds detected above the reporting limit under EPA Method 1633) of the influent sample was 45.32 parts per trillion (ppt). The total PFAS concentration of the effluent sample was 15.5 ppt, which is the sum of the following concentrations of:

- Perfluoropentanoic Acid (PFPeA) – 12.5 ppt
- Perfluorohexanoic Acid (PFHxA) – 3.0 ppt

Langan performed a monthly sampling event on July 8, 2026. Samples of the interim PFAS treatment system influent and effluent (ID WW\_PFAS\_INF\_RO\_C1\_070826 and WW\_PFAS\_EFF\_OOGP\_C1\_070826) were each collected as composite-grabs along with a field blank. Sample analysis has a standard turn-around time of approximately 10 business days, and Langan will validate the results with an anticipated turnaround time of 5 business days after receipt of results from the lab. At the time of this writing, validated results of the July sampling event were not yet available.

Sampling events and results obtained since November 2024 are summarized in the table below.

| Sampling Event No. | Sampling Date | Sum of Analyzed PFAS – Before Interim PFAS Treatment System (ppt) | Sum of Analyzed PFAS - After Interim PFAS Treatment System, Before Discharge (ppt) | Date Provided to Department |
|--------------------|---------------|-------------------------------------------------------------------|------------------------------------------------------------------------------------|-----------------------------|
| 1                  | 11/20/2024    | 118.06                                                            | NA                                                                                 | 12/26/2024                  |
| 2                  | 12/17/2024    | 121.79<br>129.12                                                  | NA                                                                                 | 1/15/2025                   |
| 3                  | 1/15/2025     | 58.94                                                             | NA                                                                                 | 2/12/2025                   |
| 4                  | 2/12/2025     | 98.96                                                             | NA                                                                                 | 3/10/2025                   |
| 5                  | 3/12/2025     | 151.49                                                            | NA                                                                                 | 4/10/2025                   |
| 6                  | 4/16/2025     | 91.17                                                             | NA                                                                                 | 5/14/2025                   |
| 7                  | 5/14/2025     | 122.65                                                            | NA                                                                                 | 6/19/2025                   |
| 8                  | 6/11/2025     | 247.82                                                            | NA                                                                                 | 7/9/2025                    |
| 9                  | 7/16/2025     | 98.7                                                              | 4.22                                                                               | 8/8/2025                    |

|    |            |         |         |            |
|----|------------|---------|---------|------------|
| 10 | 8/13/2025  | 105.29  | 28.25   | 9/11/2025  |
| 11 | 9/10/2025  | 163.76  | 50.71   | 10/09/2025 |
| 12 | 10/08/2025 | 68.32   | 11.67   | 11/06/2025 |
| 13 | 11/05/2025 | 58.14   | ND      | 12/15/2025 |
| 14 | 12/10/2025 | 46.76   | 18.89   | 1/13/2026  |
| 15 | 1/7/2026   | 53.88   | ND      | 2/6/2026   |
| 16 | 2/4/2026   | 44.08   | 9.75    | 3/11/2026  |
| 17 | 3/2/2026   | 77.76   | 37.92   | 4/13/2026  |
| 18 | 4/8/2026   | 57.41   | ND      | 5/1/2026   |
| 19 | 5/6/2026   | 65.02   | 4.24    | 6/9/2026   |
| 20 | 6/3/2026   | 45.32   | 15.5    | 6/30/2026  |
| 21 | 7/8/2026   | Pending | Pending | Pending    |

Sampling before and after the wastewater treatment plant interim PFAS treatment will continue to occur monthly, and Perdue will conduct system maintenance and/or make modifications, as appropriate. Results will be provided to the MDE within 7 days of completing data validation and management, and will also be attached to the Facility's monthly Discharge Monitoring Report (DMR).

Langan may recommend replacing "composite-grab" sampling with grab sampling, if appropriate (e.g., if the source(s) of PFAS in the wastewater is/are determined to be continuous/non-transient, PFAS concentrations are stable or exhibiting steady trends based on monthly monitoring results, etc.).

## **B. Source Identification**

At the request of MDE's Controlled Hazardous Substance Enforcement Divisions ("CHS"), Langan performed an Environmental Assessment of PFAS, on behalf of PAB, to identify potential sources of PFAS in soil and groundwater at the Facility (referred to in the report as "Areas of Interest" (AOIs)). The assessment methods and findings were summarized in a report titled *Environmental Assessment of PFAS, Perdue AgriBusiness LLC, Salisbury, Maryland* (EA Report), which was submitted to MDE's CHS Division on January 21, 2025.

Based on the investigation to-date, Langan has determined that Aqueous Film-Forming Foam (AFFF) from PAB's former fire suppression system is the only original site-related source of regulated PFAS detected in environmental media (soil, groundwater, surface water, sediment) at the ZCR Facility. The AFFF Fire Suppression System is one of nine identified PFAS AOIs identified in the EA Report. The other eight PFAS AOIs are potential secondary AOIs that were, or may have been, affected by historic discharges of AFFF. Langan and PAB are in the process of gathering additional information about the AOIs. Updated information pertinent to this effort is summarized below.

The former AFFF fire suppression system, which most recently contained Ansulite AFC-3B, has been fully decommissioned and replaced with new piping and system components designed to operate with a synthetic fluorine-free foam (SFFF). On January 12, 2026, following authorization from MDE, the SFFF fire suppression system underwent flow and calibration testing to verify proper proportioning of foam concentrate, utilizing Planit Safe surrogate test fluid. Three

proportioning tests were completed under varying pressures and surrogate fluid concentrations without issue. Following completion of testing, the SFFF system was put into operational status. In the longer term, PAB is evaluating the feasibility of transitioning to a water deluge fire suppression system.

PAB submitted a Revised/Final PFAS Investigation Workplan (IWP) for the ZCR Facility to MDE on May 28, 2025, following receipt and incorporation of MDE-LRP's second round of comments, issued on May 7, 2025, regarding PAB's April 10 (and earlier March 7) IWP submissions. MDE approved the Revised/Final IWP in a letter dated June 12, 2025.

The investigation activities outlined in the IWP focused on characterizing PFAS occurrence in soil and groundwater within the identified AOIs, including prioritized soil sampling locations, targeted groundwater sampling, and hydrogeologic characterization. Field activities commenced on July 9, 2025, and concluded the week of September 8, 2025. A Technical Memorandum summarizing this phase of the site investigation was submitted to MDE on November 13, 2025. Langan received comments on the SI Technical Memo and requests for additional information from MDE in a letter dated February 25, 2026. Langan provided the information requested by MDE in the following deliverables:

- April 30, 2026 Interim Wastewater PFAS Treatment System Technical Memorandum
- April 30, 2026 PFAS Groundwater Investigation Technical Memorandum
- May 28, 2026 AFFF System Decommissioning Memorandum
- June 5, 2026 Process Water Assessment Report
- June 5, 2026 Perdue Response to MDE Regarding AFFF Discharges
- June 5, 2026 Supplemental Site Investigation Workplan

Langan and PAB implemented an iterative, detailed process and wastewater sampling plan to evaluate PFAS occurrence and transport across various facility operations and water use areas, including influent, effluent, and internal process streams. Sampling locations were selected to reflect distinct processes, operations, usage patterns, and treatment systems. Langan submitted the findings in the aforementioned Process Water Assessment Report dated June 5, 2026.

Steps have been taken to investigate potential inflows, including possible groundwater intrusion, that could contribute to observed PFAS concentrations in samples taken from a comingled process sewer manhole located near the AFFF Fire Suppression System, which MDE sampled in December 2023. Further investigation of possible groundwater intrusions was conducted as part of the IWP. As further detailed in the November 13, 2025 Site Investigation Technical Memorandum, the water table does not appear to have been in contact with the manhole structure during the September 2025 gauging event; therefore, PFAS-impacted groundwater could not have been infiltrating the manhole (and thereby could not have been entering the Facility's process sewers through the manhole) at the time of the gauging.

Groundwater is used in the Facility's operations and therefore could be a source of PFAS in Facility wastewater. Accordingly, PAB has implemented PFAS treatment systems for product contact water and steam, including boiler feedwater, crush plant process water, oil refinery process water, and oil refinery truck wash water.

### C. Closing

As stated above, NPDES PFAS sampling will continue to occur monthly as required in the Department's November 2024 letter. Plans and scheduling for source assessment and sampling are continuing to be developed and implemented, as summarized above.

Sincerely,

**Langan Engineering and Environmental Services, LLC**

A handwritten signature in black ink, appearing to read "Jeffrey A. Smith". The signature is fluid and cursive, with the first name "Jeffrey" being the most prominent.

Jeffrey A. Smith, P.G.  
Senior Associate

cc: Jaclyn Mays, PAB  
Herb Frerichs, PAB