



Maryland Department of Environment
Water and Science Administration
Compliance Program
1800 Washington Blvd, Suite 420
Baltimore, MD 21230-1719
410- 537-3510, 1-800-633-6101

Inspector: Jacob Haglund
AI ID: 172623
Site Name: QLoop LLC - Sage Fiber (Segment 4)
Facility Address: Potomac Edison Row, 39.249374 -77.483653, Fisher Avenue, Poolesville, MD 20842
County: Montgomery County
Start Date/Time: April 04, 2024 11:30 AM
End Date /Time: April 04, 2024 04:00 PM
Media Type(s): NPDES Construction Activity, Nontidal Wetlands, Waterway Construction
Contact(s):

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- Jeremy Peterson - NPL Construction Co.
- Brian Reddit - NPL Construction Co.

<p><u>NPDES Construction Activity & Waterway Construction</u> Permit / Approval Numbers: 20CPY06G4, 21-NT-3181 NPDES Numbers: MDRCY06G4 Inspection Reason: Follow-up (Non-Compliance) Site Status: Active Compliance Status: Noncompliance Recommended Action: Continue Routine Inspection, Additional Investigation Required Evidence Collected: Photos or Videos Taken, Record Review, Visual Observation Delivery Method: Emailed to the above contacts on 04/11/2024. Weather: Overcast</p>	<p><u>Nontidal Wetlands</u> Permit / Approval Numbers: 21-NT-3181 NPDES Numbers: N/A Inspection Reason: Follow-up (Non-Compliance) Site Status: Active Compliance Status: Compliance Recommended Action: Continue Routine Inspection Evidence Collected: Photos or Videos Taken, Record Review, Visual Observation Delivery Method: Emailed to the above contacts on 04/11/2024. Weather: Overcast</p>
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Inspection Findings:

An unannounced follow-up noncompliance inspection was done for the Sage Telecommunication Fiber Network project. Segment 2 was the only Segment inspected because all other Segments were inactive and stabilized. Jeremy Peterson and Brian Reddit were the drilling rig representatives, providing information and details about the drilling under the Monocacy River.

Inspection Date: April 04, 2024
Site Name: QLoop LLC - Sage Fiber
Facility Address: Potomac Edison Row, 39.249374 -77.483653, Fisher Avenue, Poolesville, MD 20842

The site has gained authorization to bore under the Monocacy River during the designated use stream closure period. The NPDES self-inspection logbook was reviewed digitally and found to be up to date; the details documented in the reports adequately reflected site conditions. The SWPPP document was reviewed and found to be satisfactory. The site has 20-CP permit coverage, but NPL Construction Co. does not have coverage. This site is authorized for waterway and nontidal wetland construction: “To construct a 41-mile fiber ring network. 25 miles of which are located in Maryland, Work includes trenching and hydraulic directional drilling for utility installation, installation of appurtenant features, and associated matting within the wetland and wetland buffer for access. The project will temporarily impact 222,528 square feet of 100-year nontidal floodplain, 89 square feet of forested nontidal wetland, 6,417 square feet of emergent nontidal wetland, and 22,506 square feet of 25' nontidal wetland buffer.”

Segment 2 was inspected, where the boring under the Monocacy River is happening. Three frac-outs (inadvertent returns) were found downslope of the active drilling operation on the east side of the Monocacy River. Mr. Peterson and Mr. Reddit at the drilling rig explained that there had been three frac-outs: one frac-out was within a previously bored hole that was later abandoned. Another frac-out was within the channel of a waterway (UT to Monocacy River, use class I-P waters), and the discharge point was located underwater; it was evident that there was sediment-laden water discharging into the waterway. A sandbag containment was set up within the waterway to contain the sediment-laden discharge and to pump out the discharge water to the abandoned borehole (where there was also frac-out discharge). The other frac-out was on the western side of the same waterway but the frac-out was on dry land and contained with filter logs; this frac-out was being pumped out. Sediment pollution was found in the Waters of the State and remains in a condition likely to continue to pollute.

There were issues found with the sediment and erosion controls on the access road off of the Mouth of the Monocacy Road. The matting was crushed in some locations and/or sinking. Also, where the matting crosses over-regulated wetland and/or waterway areas should have controls along the edge of the matting. Waterways and wetlands that were crossed lacked adequate controls at the edge of the matting. Sediment pollution was noticed in the waterways (Waters of the State) that are crossed by the access road leading to the boring operation off of Mouth of Monocacy Road. Sediment pollution is in a position likely to pollute the Waters of the State.

Site representatives for the project are seeking approval and authorization to address the previous violations (documented in the 02/15/2024 MDE inspection report) All of the violations from the 02/15/2024 MDE inspection and report are still present.

This site is in violation of Environmental Article Titles 4, 5 & 9. The following violations// corrective actions should be addressed immediately:

- 1) Previously it was noticed that vehicles had been pulling in and out of unapproved areas along Segment 1, and some dirt and sediment tracking were noticed on the road. // Vehicles should park at approved locations and access Segment 1 at approved locations. Access points should be added to the approved plan for Segment 1 and approved by the Soil Conservation District. These access points should have SCEs and/or matting that are installed and maintained as per the 2011 Maryland Standards and Specifications for Soil

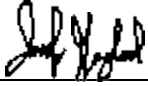
Inspection Date: April 04, 2024
Site Name: QLoop LLC - Sage Fiber
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Erosion and Sediment Control. All sediment tracking should be cleaned up from the public roads and SCE should be maintained and installed.

- 2) The access route south of Whites Ferry Rd. appears to have been made and not authorized and shown on the approved plan. // Access routes should be shown on the approved plan and authorized.
- 3) A waterway (an untitled tributary to the Potomac River, designated use class I Waters) has been crossed and forded without authorization. Matting and stone materials have been installed within the floodplain. The location of the waterway crossing is on Noland's-Ferry Road (located at roughly 39.2432419, -77.4642022). // Impacts associated with the stream crossing and the flood plain should be authorized and shown within the LOD and on an approved plan set. A pump around practice and/or a mountable berm could be utilized to divert the waterway. Ensure all controls are installed as per the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control.
- 4) There were issues found with the sediment and erosion controls on the access road off of the Mouth of the Monocacy Road. The matting was crushed in some locations and/or sinking. Waterways and wetlands that were crossed lacked adequate controls at the edge of the matting and road. Sediment pollution was noticed in the waterways (Waters of the State) that are crossed by the access road leading to the boring operation. Sediment pollution remains in a position likely to pollute the Waters of the State. // Where the matting crosses over-regulated wetland and/or waterway areas should have controls along the edge of the matting. Replace matting that is breaking and/or crushed from vehicle traffic. Double up matting when one segment of matting is sinking. Add sediment and erosion control along the edge of the access road (Segment 2) where regulated wetlands and waterways are crossed. Ensure all controls are installed as per the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control.
- 5) There were two frac-outs found outside of the LOD and it was evident that sediment (bentonite) pollution was entering the Waters of the State. Sediment (bentonite) pollution also remains in a position likely to pollute the Waters of the State. A 24-hour notification was not given to MDE about the frac-out events. These events occurred on 03/20/2024. The Frac-out Contingency Plan was not followed: drilling did not cease when the frac-out was found and 24-hour notification was not given to MDE. // The Frac-out Contingency Plan should be utilized and followed in the event of a frac-out and/or a pressure decrease when drilling. Ensure the Contingency Plan is followed when remediating the issues of a frac-out and when notifying MDE. MDE should be notified in 24 hours when a frac-out has been found.
- 6) There are disturbed areas outside of the LOD lacking stabilization. These areas are around where the frac-outs were noticed. The downslope areas were lacking sediment and erosion controls. // Ensure areas outside of the LOD are stabilized on the day of disturbance. These areas should be stabilized with seed (native floodplain mix) and straw. The downslope area of the areas disturbed should have sediment and erosion controls installed. Ensure all controls are installed as per the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control.
- 7) NPL Construction Co. does not have 20-CP coverage. NPL has operational control over the sediment and erosion controls. // Ensure that NPL Construction Co. applies for 20-CP (Construction Stormwater Permit) coverage.

Inspection Date: April 04, 2024
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Facility Address: Potomac Edison Row, 39.249374 -77.483653, Fisher Avenue, Poolesville, MD 20842

Additional investigation is required for this site. Please contact me when corrective actions have been implemented as described above. You can reach me at 443-571-1589 or by email which is listed below.

Inspector:  _____ 04/10/2024 Received by: _____
Jacob Haglund /Date Signature/Date
jacob.haglund@maryland.gov
301-689-1486

Print Name



Figure A: There were issues found with a lack of sediment and erosion controls on the edge of the access road off of the Mouth of the Monocacy Road. Sediment pollution was noticed in the waterways (Waters of the State) that are crossed by the access road leading to the boring operation. Sediment pollution remains in a position likely to pollute the Waters of the State.



Figure B: There were issues found with the sediment and erosion controls on the access road off of the Mouth of the Monocacy Road. The matting was crushed in some locations and/or sinking. Crossed waterways and wetlands lacked adequate controls at the edge of the matting. Sediment pollution was noticed in the waterways (Waters of the State) that are crossed by the access road leading to the boring operation. Sediment pollution remains in a position likely to pollute the Waters of the State.



Figure C: There was a frac-out within a previously bored hole that was later abandoned. This location was outside the LOD. Also, sediment-laden water is being pumped out of the other frac-out locations to this abandoned bored hole. Sediment (bentonite) pollution was found in the Waters of the State and remains in a condition likely to continue to pollute.



Figure D: Another frac-out was within the channel of a waterway (UT to Monocacy River, use class I-P waters), and the discharge point was located underwater; it was evident that there was sediment-laden water discharging into the waterway. A sandbag containment was set up within the waterway to contain the sediment-laden discharge and to pump out the discharge water to the abandoned borehole (where there was also frac-out discharge). Sediment (bentonite) pollution was found in the Waters of the State and remains in a condition likely to continue to pollute.



Figure E: The other frac-out was on the western side of the same waterway but the frac-out was on dry land and contained with filter logs; this frac-out was being pumped out. Sediment (bentonite) pollution was found in the Waters of the State and remains in a condition likely to continue to pollute.



Figure F: The clear water diversion appeared to be discharging clear water and down stream of the frac-out locations were found to be clear during the time of the inspection.



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Inspector: Jacob Haglund
AI ID: 172623
Site Name: QLoop LLC - Sage Fiber (Segment 2)
Facility Address: Potomac Edison Row, 39.249374 -77.483653, Fisher Avenue, Poolesville, MD 20842
County: Montgomery County
Start Date/Time: April 10, 2024 03:00 PM
End Date /Time: April 10, 2024 05:50 PM
Media Type(s): NPDES Construction Activity, Waterway Construction
Contact(s):

- Natalie Foret - Telcon Services: nforet@telconservices.com
- Courtney Athas - Wetland Studies and Solutions, Inc: cathas@wetlands.com
- Matt Elliott - Wetland Studies and Solutions, Inc.: MElliott@wetlands.com
- Jeff Schamber (Not on-site)- Telcon Services: jschamber@telconservices.com
- Bill Willams (Not on-site)- QLoop: bill@ql.email
- Jeremy Peterson - NPL Construction Co.
- Douglas Cochran – Frederick County Government: DCochran@frederickcountymd.gov
- Eric Dobson – Frederick County Government: EDodson@frederickcountymd.gov

NPDES Construction Activity & Waterway Construction

Permit / Approval Numbers: 20CPY06G4, 21-NT-3181

NPDES Numbers: MDRCY06G4

Inspection Reason: Follow-up (Non-Compliance), Initial Quarterly, Initial Yearly, Routine Scheduled

Site Status: Active - No work today

Compliance Status: Noncompliance

Recommended Action: Continue Routine Inspection

Evidence Collected: Photos or Videos Taken, Visual Observation

Delivery Method: Emailed to the above contacts on 04/ /2024.

Weather: Calm

Inspection Findings:

An announced follow-up noncompliance inspection and meeting was done for the Sage Telecommunication Fiber Network project. Segment 2 was inspected where the most recent frac-outs (inadvertent returns) were located and documented. Representatives from Telcon Services LLC., QLoop, NPL Construction Co., Wetland Studies and Solutions Inc., MDE, and Frederick County Government were onsite to discuss the details regarding the most recent frac-outs and corrective actions. The site has gained authorization to bore under the Monocacy River during the designated use stream closure period. According to the site representatives, the drilling progress on the eastern side of the Monocacy is roughly 90 feet from the receiving borehole. Boring has ceased

Inspection Date: April 10, 2024
Site Name: QLoop LLC - Sage Fiber
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at the site because the Frederick County Government had issued a stop work order to be able to address the frac-outs. During the time of today's inspection, the water downstream of the frac-outs was found to be clear, but sediment/bentonite deposition was evident. The site has 20-CP permit coverage, but NPL Construction Co. does not have coverage.

Several frac-outs (inadvertent returns) were found and previously documented downslope of the active drilling operation on the east side of the Monocacy River. One frac-out was within a previously bored hole that was later abandoned. Another frac-out was within the channel of a waterway (UT to Monocacy River, use class I-P waters), and the discharge point was located underwater on the stream bank. There was a frac-out on the western side of the same waterway, this frac-out was on dry land and contained with filter logs, sandbags, and silt fence. There was another frac-out found within the channel of the waterway (UT to Monocacy River, use class I-P waters) just downstream where the farm stream crossing is located; there was sediment deposition deposited in the stream where the frac-out occurred. All of the frac-outs that occurred in the waterway (UT to Monocacy River, use class I-P waters) had sandbag containments around the discharge points; the containment was utilized to help isolate and pump out the sediment-laden discharge water. Minor areas of sediment (bentonite) pollution were found in the Waters of the State.

There were issues found with the sediment and erosion controls on the access road off of the Mouth of the Monocacy Road. The matting was crushed in some locations and/or sinking. Also, where the matting crosses over-regulated wetland and/or waterway areas should have controls along the edge of the matting. Sediment pollution was observed in the waterways (Waters of the State) and remains in a condition likely.

All of the violations from the 04/04/2024 MDE inspection and report are still present.

This site is in violation of Environmental Article Titles 4, 5 & 9. The following violations// corrective actions should be addressed immediately:

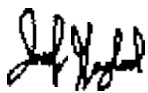
- 1) Matting was crushed in some locations and/or sinking. Waterways and wetlands that were crossed lacked adequate controls at the edge of the matting and road. Sediment pollution was observed and remains in a position likely to pollute the Waters of the State. // Where the matting crosses over-regulated wetland and/or waterway areas should have controls along the edge of the matting. Replace matting that is breaking and/or crushed from vehicle traffic. Double up matting when one segment of matting is sinking. Add sediment and erosion control along the edge of the access road (Segment 2) where regulated wetlands and waterways are crossed. Ensure all controls are installed as per the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control.
- 2) There were several documented frac-outs found outside of the LOD and it was evident that sediment (bentonite) pollution had entered the Waters of the State. Sediment (bentonite) pollution also remains in a position likely to pollute the Waters of the State. // Deposited sediment (bentonite) should be pumped out where it is deposited behind sandbags or filter logs. Stabilize the stream bank with seed (native floodplain mix) and straw once all emergency work has been completed around the impacted waterway and floodplain. Ensure

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that the outfall pipe for the pump around is secured so that the pipe end will not vibrate and cause disturbance on the stream bank.

- 3) A 24-hour notification was not given to MDE when the frac-out events were first noticed. These events occurred on 03/30/2024. The Frac-out Contingency Plan was not followed: drilling did not cease when the frac-out resumed. // The Frac-out Contingency Plan should be utilized and followed in the event of a frac-out and/or a pressure decrease when drilling. Ensure the Contingency Plan is followed when remediating the issues of a frac-out and when notifying MDE. MDE should be notified in 24 hours when a frac-out has been found. There should always be personnel inspecting the surrounding area for frac-outs when the drilling operation is active.
- 4) There are disturbed areas outside of the LOD lacking stabilization. These areas are around where the frac-outs were noticed. The downslope areas of the drilling operation (outside of the LOD) lacked sediment and erosion controls. // Ensure areas outside of the LOD are stabilized on the day of disturbance. These areas should be stabilized with seed (native floodplain mix) and straw. The downslope area of the areas disturbed should have sediment and erosion controls installed. Ensure all controls are installed as per the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control.
- 5) NPL Construction Co. does not have 20-CP coverage. NPL has operational control over the sediment and erosion controls. // Ensure that NPL Construction Co. applies for 20-CP (Construction Stormwater Permit) coverage. Alternatively, Telcon may transfer its coverage to NPL.

Please contact me when corrective actions have been implemented as described above. You can reach me at 443-571-1589 or by email which is listed below.

Inspector:  _____ 04/11/2024 Received by: _____
Jacob Haglund /Date
jacob.haglund@maryland.gov
301-689-1486
Signature/Date

Print Name



Figure A: There were issues found with a lack of sediment and erosion controls on the edge of the access road off of the Mouth of the Monocacy Road. Sediment pollution was noticed in the waterways (Waters of the State) that are crossed by the access road leading to the boring operation. Sediment pollution remains in a position likely to pollute the Waters of the State.



Figure B: There were issues found with the sediment and erosion controls on the access road off of the Mouth of the Monocacy Road. The matting was crushed in some locations and/or sinking. Crossed waterways and wetlands lacked adequate controls at the edge of the matting. Sediment pollution was noticed in the waterways (Waters of the State) that are crossed by the access road leading to the boring operation. Sediment pollution remains in a position likely to pollute the Waters of the State.



Figure C: There was another frac-out found within the channel of the waterway (UT to Monocacy River, use class I-P waters) just downstream where the farm stream crossing is located; there was sediment deposition deposited in the stream where the frac-out occurred. All of the frac-outs that occurred in the waterway (UT to Monocacy River, use class I-P waters) had sandbag containments around the discharge points. Sediment (bentonite) pollution was found in the Waters of the State and remains in a condition likely to continue to pollute.



Figure D: Another frac-out was within the channel of a waterway (UT to Monocacy River, use class I-P waters), and the discharge point was located underwater on the stream bank. All of the frac-outs that occurred in the waterway (UT to Monocacy River, use class I-P waters) had sandbag containments around the discharge points; the containment was utilized to help to isolate and pump out the sediment-laden discharge water. Sediment (bentonite) pollution was found in the Waters of the State and remains in a condition likely to continue to pollute.



Figure E: There was a frac-out on the western side of the waterway (UT to Monocacy River, use class I-P waters), this frac-out was on dry land and contained with filter logs, sandbags, and silt fence. Sediment (bentonite) pollution was found in the Waters of the State and remains in a condition likely to continue to pollute. There was substantial sediment (bentonite) pollution downstream of where the frac-outs were located.



Figure F: Outside of the frac-out documented in Figure E there was sediment (bentonite) deposition. Sediment pollution was found in the Waters of the State and remains in a condition likely to continue to pollute. There was substantial sediment (bentonite) pollution downstream of where the frac-outs were located.



Figure G: Sediment pollution was found in the Waters of the State where the farm waterway crossing is located. There was substantial sediment (bentonite) pollution downstream of where the frac-outs were located.



Figure H: "Origin/pumping area of tributary and the site of the bentonite discharge. Upstream is clearwater flow." The photo was taken on 04/08/2024 by Douglas Cochran with Frederick County Government.



Figure 1: "Bentonite mud and drilling fluid present further downstream." The photo was taken on 04/08/2024 by Douglas Cochran with Frederick County Government.



Figure J: "Pumping and dam area downstream. Dewatering pools present in the distance." The photo was taken on 04/08/2024 by Douglas Cochran with Frederick County Government.



Figure K: "Bentonite mud and drilling fluid downstream of the initial discharge area." The photo was taken on 04/08/2024 by Douglas Cochran with Frederick County Government.



Figure L: "Clearwater pump around discharge to turbid streamflow downstream of containment area." The photo was taken on 04/08/2024 by Douglas Cochran with Frederick County Government.



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AI ID: 172623
Site Name: QLoop LLC - Sage Fiber
Facility Address: Potomac Edison Row, 39.249374 -77.483653, Fisher Avenue, Poolesville, MD 20842
County: Montgomery County
Start Date/Time: April 25, 2024 11:00 AM
End Date /Time: April 25, 2024 05:00 PM
Media Type(s): Waterway Construction, NPDES Construction Activity, Nontidal Wetlands
Contact(s):

- Natalie Foret (Not on-site)- Telcon Services:
nforet@telconservices.com
- Courtney Athas (Not on-site)- Wetland Studies and Solutions, Inc:
cathas@wetlands.com
- Matt Elliott (Not on-site)- Wetland Studies and Solutions, Inc.:
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- Jeff Schamber (Not on-site)- Telcon Services:
jschamber@telconservices.com
- Alexander Vitlin – WSSC (Not on-site):
Alexander.Vitlin@wsscwater.com
- Bill Willams (Not on-site)– Qloop: bill@ql.email
- Jeremy Peterson - NPL Construction Co.
- Brian Reddit - NPL Construction Co.

NPDES Construction Activity
& Waterway Construction

Permit / Approval Numbers: 20CPY06G4, 21-NT-3181
NPDES Numbers: MDRCY06G4
Inspection Reason: Follow-up (Non-Compliance), Initial Quarterly, Initial Yearly, Routine Scheduled
Site Status: Active
Compliance Status: Noncompliance
Recommended Action: Continue Routine Inspection
Evidence Collected: Photos or Videos Taken, Record Review, Visual Observation
Delivery Method: Emailed to above contacts on 05/02/2024.
Weather: Calm

Nontidal Wetlands

Permit / Approval Numbers: 21-NT-3181
NPDES Numbers: N/A
Inspection Reason: Follow-up (Non-Compliance), Initial Quarterly, Initial Yearly, Routine Scheduled
Site Status: Active
Compliance Status: Compliance
Recommended Action: Continue Routine Inspection
Evidence Collected: Photos or Videos Taken, Record Review, Visual Observation
Delivery Method: Emailed to above contacts on 05/02/2024.
Weather: Calm

Inspection Findings:

An announced follow-up noncompliance inspection and meeting was done for the Sage Telecommunication Fiber Network project. The site has 20-CP permit coverage, but NPL Construction Co. does not have coverage. NPDES self-inspections appeared to be well documented and up to date. Segments 2 and 16 were inspected. Two property owners that have land that borders

Inspection Date: April 30, 2024
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and/or is directly impacted by Segment 2 met with me on-site to discuss issues regarding the frac-outs off of Mouth of Monocacy Road. Another property owner met with me at Segment 16 to discuss impacts associated with frac-outs and land disturbance near and/or on his agricultural use property.

This project has gained authorization to bore under the Monocacy River during the designated use stream closure period. Boring has commenced again after the drilling under the Monocacy operation had to cease due to a stop-work order issued by the Frederick County Government. During the time of today's inspection, the water downstream of the pump around discharge location was found to be turbid because the pump used for the pump around practice appeared to be discharging water in a vertical direction, therefore once the water landed in the waterway it was causing the stream substrate to become dislodged and suspended. Once the pump was fixed by one of the representatives onsite the downstream water cleared up. The waterway directly below the frac-outs was clear. Sediment/bentonite deposition was evident from the several frac-out locations downstream to the mouth of the waterway.

There were 6 frac-out (inadvertent returns) locations that were noticed downslope of the active drilling operation on the east side of the Monocacy River. One frac-out was within a previously bored hole that was later abandoned. Three frac-outs are within the channel of a waterway (UT to Monocacy River, use class I-P waters), and the discharge points are located underwater. There are two frac-outs on the western side of the same waterway, these frac-outs are on dry land. All of the frac-outs are contained to one portion of the stream (UT to Monocacy River, use class I-P waters), which was blocked off with sandbags and impermeable fabric. The frac-outs are not all individually contained; some of the frac-outs that lack full individual containment flow into the portion of the stream (UT to Monocacy River, use class I-P waters) that is blocked off and where pumps are being used to vacuum out the deposited sediment (bentonite). Many areas of sediment (bentonite) pollution were found in the Waters of the State.

Two frac-out locations were inspected at Segment 16. These frac-outs were found to be no longer discharging; both areas appeared to be cleaned up, other than one frac-out location that appeared to have caused a crack/fracture noticed on the ground surface and lacked stabilization. Segment 16 had no other non-compliance issues found during the time of the inspection.

The following violations were **corrected** since the last MDE inspection of 04/10/2024:

- 1) Matting was crushed in some locations and/or sinking. Waterways and wetlands that were crossed lacked adequate controls at the edge of the matting and road. Sediment pollution was observed and remains in a position likely to pollute the Waters of the State.
- 2) There are disturbed areas outside of the LOD lacking stabilization. These areas are around where the frac-outs were noticed. The downslope areas of the drilling operation (outside of the LOD) lacked sediment and erosion controls.

The following violations were noticed during the time of the inspection and/or continue to be present since the last MDE inspections on 04/04/2024 and 04/10/2024. The corrective actions are listed below as well.

Inspection Date: April 30, 2024
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This site is in violation of Environmental Article Titles 4, 5 & 9. The following violations// corrective actions should be addressed immediately:

- 1) There were several frac-outs found outside of the LOD and it was evident that sediment (bentonite) pollution had entered the Waters of the State. Two of these frac-outs have not been reported to MDE by a representative for QLoop but rather discovered on this date of inspection. One of the undocumented frac-outs was found by the documented (in the 04/10/2024 MDE inspection report) frac-out on the western side of the waterway (UT to Monocacy River, use class I-P waters), on dry land. The other undocumented frac-out was within the stream (UT to Monocacy River, use class I-P waters) channel just downstream of the documented (in the 04/10/2024 MDE inspection report) frac-out that was contained with sandbags around the discharge point. Sediment (bentonite) pollution also remains in a position likely to pollute the Waters of the State. // Deposited sediment (bentonite) should be pumped out where it is deposited behind sandbags or filter logs. Each frac-out location should be separately contained, isolated with controls, and pumped out. All deposited sediment (bentonite) downstream of the frac-out locations should be pumped out the of waterway (UT to Monocacy River, use class I-P waters). Stabilize the stream bank with seed (native floodplain mix) and straw once all emergency work has been completed around the impacted waterway and floodplain. Ensure that the outfall pipe for the pump around is secured so that the pipe end will not vibrate and cause disturbance on the stream bank.
- 2) A 24-hour notification was not given to MDE when the frac-out events were first noticed. The Frac-out Contingency Plan was not followed. // The Frac-out Contingency Plan should be utilized and followed in the event of a frac-out and/or a pressure decrease when drilling. Ensure the Contingency Plan is followed when remediating the issues of a frac-out and when notifying MDE. MDE should be notified in 24 hours when a frac-out has been found. There should always be personnel inspecting the surrounding area for frac-outs when the drilling operation is active.
- 3) There were cracks/fractures in the ground, noticed at the frac-out location in Segment 16 (located at roughly 39.3158900, -77.4996900). Sediment (bentonite) pollution has occurred in the Waters of the State but was contained during the time of the inspection. // Backfill the cracks/fractures where there was a frac-out with clean soil. Ensure areas outside of the LOD are stabilized on the day of the disturbance. These areas should be stabilized with seed (native floodplain mix) and straw.
- 4) NPL Construction Co. does not have 20-CP coverage. NPL has operational control over the sediment and erosion controls. // Ensure that NPL Construction Co. applies for 20-CP (Construction Stormwater Permit) coverage. Alternatively, Telcon may transfer its coverage to NPL.
- 5) Vehicles have been pulling in and out of unapproved areas along Segment 1, and some dirt and sediment tracking were noticed on the road. // Vehicles should park at approved locations and access Segment 1 at approved locations. Access points should be added to the approved plan for Segment 1 and approved by the Soil Conservation District. These access points should have SCEs and/or matting that are installed and maintained as per the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control. All sediment tracking should be cleaned up from the public roads and SCE should be maintained and installed.

Inspection Date: April 30, 2024
Site Name: QLoop LLC - Sage Fiber
Facility Address: Potomac Edison Row, 39.249374 -77.483653, Fisher Avenue, Poolesville, MD 20842

- 6) The access route south of Whites Ferry Rd. appears to have been made and not authorized and shown on the approved plan. // Access routes should be shown on the approved plan and authorized.
- 7) A waterway (an untitled tributary to the Potomac River, designated use class I Waters) has been crossed and forded without authorization. Matting and stone materials have been installed within the floodplain. The location of the waterway crossing is on Noland's-Ferry Road (located at roughly 39.2432419, -77.4642022). // Cease crossing immediately and obtain authorization to install a suitable authorized crossing. Impacts associated with the stream crossing and the flood plain should be authorized and shown within the LOD and on an approved plan set. A pump around practice and/or a mountable berm could be utilized to divert the waterway. Ensure all controls are installed as per the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control.

Routine inspections will occur for this site. Please contact me when corrective actions have been implemented as described above. You can reach me at 443-571-1589 or by email which is listed below.


Inspector:  _____ 04/30/2024 Received by: _____
Jacob Haglund /Date _____ Signature/Date
jacob.haglund@maryland.gov _____
301-689-1486 _____
Print Name



Figure A: One of the undocumented frac-outs was found by the documented (in the 04/10/2024 MDE inspection report) frac-out on the western side of the waterway (UT to Monocacy River, use class I-P waters), on dry land. This frac-out is located at Segment 2. Sediment (bentonite) pollution is occurring in the Waters of the State but is contained at a downstream point.



Figure B: The furthest upstream (UT to Monocacy River, use class I-P waters) frac-out is contained and previously documented. This frac-out is located at Segment 2. Sediment (bentonite) pollution is occurring in the Waters of the State but is contained in a portion of the waterway.



Figure C: The other undocumented frac-out was within the stream (UT to Monocacy River, use class I-P waters) channel just downstream of the documented (in the 04/10/2024 MDE inspection report) frac-out (frac-out in Figure B) that was contained with sandbags around the discharge point. This frac-out is located at Segment 2. Sediment (bentonite) pollution is occurring in the Waters of the State but is contained at a downstream point.



Figure D: Another of the frac-outs within the channel of the waterway (UT to Monocacy River, use class I-P waters) just downstream where the farm stream crossing is located; there was sediment deposited in the stream where the frac-out occurred. This frac-out is located at Segment 2. Sediment (bentonite) pollution is occurring in the Waters of the State but is contained in a portion of the waterway.



Figure E: The two frac-outs on the western bank of UT to Monocacy River are discharging into the waterway and are not individually contained. These frac-outs are located at Segment 2. The one frac-out is the same one documented in Figure A. Sediment (bentonite) pollution is occurring in the Waters of the State but is contained at a downstream point.



Figure F: There were cracks/fractures in the ground, noticed at the frac-out location in Segment 16 (located at roughly 39.3158900, -77.4996900). Sediment (bentonite) pollution has occurred in the Waters of the State but was contained during the time of the inspection.



Figure G: There were cracks/fractures in the ground, noticed at the frac-out location in Segment 16 (located at roughly 39.3158900, -77.4996900). This frac-out has been cleaned up but the cracks/fractures have not been stabilized. Sediment (bentonite) pollution has occurred in the Waters of the State but was contained during the time of the inspection.