



Annual Groundwater Monitoring Report

JH Campbell Power Plant
Dry Ash Landfill
West Olive, Michigan

January 2018



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Prepared For
Consumers Energy Company

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Executive Summary

On April 17, 2015, the United States Environmental Protection Agency (USEPA) published the final rule for the regulation and management of Coal Combustion Residuals (CCR) under the Resource Conservation and Recovery Act (RCRA) (the CCR Rule). The CCR Rule, which became effective on October 19, 2015, applies to the Consumers Energy Company (CEC) Dry Ash Landfill (Landfill) at the JH Campbell (JHC) Power Plant Site (the Site). Pursuant to the CCR Rule, no later than January 31, 2018, and annually thereafter, the owner or operator of a CCR unit must prepare an annual groundwater monitoring and corrective action report for the CCR unit documenting the status of groundwater monitoring and corrective action for the preceding year in accordance with §257.90(e).

TRC Environmental Corporation (TRC) prepared this Annual Groundwater Monitoring Report for the JHC Landfill CCR unit on behalf of CEC. This Annual Report was prepared in accordance with the requirements of §257.90(e) and presents the monitoring results and the statistical evaluation of the detection monitoring parameters (Appendix III to Part 257 of the CCR Rule) for the September 2017 semiannual groundwater monitoring event for the JHC Landfill CCR unit. This event is the initial detection monitoring event performed to comply with §257.94. As part of the statistical evaluation, the data collected during detection monitoring events are evaluated to identify statistically significant increases (SSIs) in detection monitoring parameters to determine if concentrations in detection monitoring well samples exceed background levels.

Potential SSIs over background limits were noted for boron, calcium, chloride, sulfate and total dissolved solids in one or more downgradient wells for the September 2017 monitoring event. This is the initial detection monitoring event; therefore, it is the initial identification of a SSI over background levels. According to §257.94(e), if the facility determines, pursuant to §257.93(h), that there is a SSI over background levels for one or more of the Appendix III constituents, the facility will, within 90 days of detecting a SSI, establish an assessment monitoring program **<or>** demonstrate that:

- A source other than the CCR unit caused the SSI, or
- The SSI resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality.

In response to the potential SSIs over background limits noted during September 2017, CEC plans to prepare an Alternative Source Demonstration (ASD) to evaluate whether a source other than the CCR unit caused the SSIs prior to initiating assessment monitoring.

Section 1 Introduction

1.1 Program Summary

On April 17, 2015, the United States Environmental Protection Agency (USEPA) published the final rule for the regulation and management of Coal Combustion Residuals (CCR) under the Resource Conservation and Recovery Act (RCRA) (the CCR Rule). The CCR Rule, which became effective on October 19, 2015, applies to the Consumers Energy Company (CEC) Dry Ash Landfill (Landfill) at the JH Campbell (JHC) Power Plant Site (the Site). Pursuant to the CCR Rule, no later than January 31, 2018, and annually thereafter, the owner or operator of a CCR unit must prepare an annual groundwater monitoring and corrective action report for the CCR unit documenting the status of groundwater monitoring and corrective action for the preceding year in accordance with §257.90(e).

TRC Environmental Corporation (TRC) prepared this Annual Groundwater Monitoring Report (Annual Report) for the JHC Landfill CCR unit on behalf of CEC. This Annual Report was prepared in accordance with the requirements of §257.90(e) and presents the monitoring results and the statistical evaluation of the detection monitoring parameters (Appendix III to Part 257 of the CCR Rule) for the September 2017 semiannual groundwater monitoring event for the JHC Landfill CCR unit. This event is the initial detection monitoring event performed to comply with §257.94. The monitoring was performed in accordance with the *JH Campbell Monitoring Program Sample and Analysis Plan* (SAP) (ARCADIS, 2016) and statistically evaluated per the *Groundwater Statistical Evaluation Plan* (Stats Plan) (TRC, October 2017). As part of the statistical evaluation, the data collected during detection monitoring events are evaluated to identify statistically significant increases (SSIs) of detection monitoring parameters compared to background levels.

1.2 Site Overview

The JH Campbell Plant is a coal fired power generation facility located in West Olive, Michigan, on the eastern shore of Lake Michigan. It is bordered by the Pigeon River on the south, 156th Avenue on the east, and Croswell Street to the north with Lakeshore Drive bisecting the site from north to south. The power generating plant consists of three coal fired electric generating units located on the western side of the site and the CCR disposal area is on the east side of the site, east of Lakeshore Drive. Figure 1 is a site location map showing the facility and the surrounding area.

The CCR disposal area contains two primary components: a system of wet ash ponds and a dry ash disposal facility (i.e., the JHC Landfill). The wet ash ponds area is approximately 267 acres and is bounded by perimeter dikes with a system of internal dikes separating the individual ash ponds. The CCR surface impoundments located within the wet ash pond area are Unit 1-2 Bottom Ash Ponds, Unit 3 Bottom Ash Pond, and Pond A. The existing dry ash disposal facility is a geomembrane lined landfill which is permitted for an area of about 108 acres and includes two leachate and contact water retention ponds. Site features are shown on Figure 2.

Dry, moisture-conditioned CCR from the three coal fired electric generating units continues to be managed in the licensed solid waste landfill which is regulated under Part 115 of the Natural Resources and Environmental Protection Act (NREPA), PA 451 of 1994, as amended, and monitored in adherence to the facility's MDEQ-approved *Hydrogeological Monitoring Plan (HMP) for JH Campbell Ash Storage Facility, Consumers Power Company, Solid Waste Disposal Area, Coal Ash, Type III* (September 1996). Currently, the wet ash pond area only receives CCR in the form of slurried bottom ash into the bottom ash ponds. Bottom ash is sluiced into the bottom ash ponds along with the coal pile runoff which flows into the Unit 1-2 Bottom Ash Ponds. Water is retained in these ponds unless an overflow condition is reached leading to overflow into a series of surface ditches and buried pipes which discharge into the southwest corner of Pond A.

The wet ash pond area also has one lined and one unlined chemical treatment lagoon, collectively referred to as the Chemical Treatment Ponds. These ponds are used to treat chemical cleaning wastes that discharge water via a manually controlled gate valve into the Units 1-2 Bottom Ash Pond overflow ditch. From Pond A, the effluent water travels through an outfall pipe penetrating the perimeter dike and into an open channel ditch leading to the recirculation pond. Water in the recirculation pond is then discharged through a National Pollutant Discharge Elimination System (NPDES) permitted outfall and into Pigeon River.

The purpose of the dry ash disposal facility is to contain dry bottom and fly ash produced as a result of burning coal for power production. The facility consists of the existing CCR landfill Cells 1 through 4. The state permit also identifies Cells 5 through 7 for future construction and operation. Dry ash from all of the generating units is stored in silos until it is placed into the facility or is sold and shipped off site. At this time, the north faces of Cells 1 and 2 and the eastern face of Cell 2 have been closed along with Cell 3. Cell 4 is currently being filled with ash. Cells 5 through 7 have not yet been constructed.

Currently, the only remaining active CCR surface impoundments are Bottom Ash Ponds Unit 1-2 and Pond A. In June 2017, closure of the Bottom Ash Pond Unit 3 North was underway subsequent to recovery of CCR from the pond for beneficial reuse, which will be followed by closure of the Bottom Ash Pond Unit 3 South. This report focuses on the JHC Landfill dry ash disposal CCR unit.

1.3 Geology/Hydrogeology

The upgradient/background wells are located to the north-northwest of the JHC Landfill CCR unit. Groundwater is typically encountered around 30 to 35 feet below ground surface (ft bgs) and generally flows to the south-southeast across the Landfill toward the Pigeon River. The subsurface materials encountered at the JH Campbell site generally consist of approximately 40 to 60 feet of poorly graded, fine-grained lacustrine sand. A laterally extensive clay-rich till is generally encountered within approximately 40 to 60 feet bgs across the site that according to deep drilling logs conducted at the JH Campbell Power Plant (just west of the CCR units) is on the order of 80 feet thick and extends to the top of shale bedrock approximately 140 feet bgs. Based on the hydrogeology at the site, particularly the conductive properties of the sandy aquifer and the prominent and consistent groundwater flow direction, an inter-well statistical approach is recommended for detection monitoring as outlined in the Stats Plan.

Section 2

Groundwater Monitoring

2.1 Monitoring Well Network

A groundwater monitoring system has been established for the JHC Landfill CCR unit, which established the monitoring well locations for detection monitoring. The detection monitoring well network for the JHC Landfill CCR unit currently consists of 19 monitoring wells that are screened in the uppermost aquifer. The monitoring well locations are shown on Figure 2. Monitoring wells JHC-MW-15023 through JHC-MW-15028 are located north-northwest of the JHC Landfill and provide data on background groundwater quality that has not been affected by the CCR unit (total of six background wells). Monitoring wells JHC-MW-15017 through JHC-MW-15022 and JHC-MW-15031 through JHC-MW-15037 are located downgradient of the JHC Landfill CCR unit (total of 13 downgradient monitoring wells).

As shown on Figure 2, monitoring wells JHC-MW-15029 and JHC-MW-15030 are used for water level measurements only. Based on concentrations of several Appendix III parameters, cation/anion data, and the hydrogeology of the area, monitoring wells JHC-MW-15029 and JHC-MW-15030 do not appear to be representative of background groundwater conditions; therefore, these wells were excluded from the background monitoring network.

2.2 Background Sampling

Background groundwater monitoring was conducted at the JHC Landfill CCR unit from December 2015 through August 2017 in accordance with the SAP. Data collection included eight rounds (Rounds 1 through 8) of static water elevation measurements, analysis for parameters required in the CCR Rule's Appendix III and Appendix IV to Part 257, and field parameters (dissolved oxygen, oxidation reduction potential, pH, specific conductivity, temperature, and turbidity) from all 19 monitoring wells installed for the JHC Landfill, in addition to JHC-MW-15029 and JHC-MW-15030. The Rounds 1 through 6 groundwater samples were collected and analyzed by CEC's Laboratory Services, Jackson, Michigan. Rounds 7 and 8 groundwater sampling was conducted by TRC in June and August 2017, respectively, and analyzed by Pace Analytical Services, LLC (Pace). Background data are included in Appendix A Tables 1 through 3, where: Table 1 is a summary of static water elevation data (site-wide water level data from CCR program monitoring wells); Tables 2 and 3 are a summary of the groundwater analytical data compared to potentially relevant criteria; and Table 4 is a summary of field data.

In addition to the data tables, groundwater contour maps were developed using site-wide water level data from CCR program monitoring wells for each of the background events to evaluate groundwater flow directions. The contour maps for each background monitoring event are also included in Appendix A as Figures 1 through 8.

2.3 Semiannual Groundwater Monitoring

The semiannual monitoring parameters for the detection groundwater monitoring program were selected per the CCR Rule's Appendix III to Part 257 – Constituents for Detection Monitoring. The Appendix III indicator parameters consist of boron, calcium, chloride, fluoride, pH (field reading), sulfate, and total dissolved solids (TDS) and were analyzed in accordance with the SAP. In addition to pH, the collected field parameters included dissolved oxygen, oxidation reduction potential, specific conductivity, temperature, and turbidity.

2.3.1 Data Summary

The initial semiannual groundwater detection monitoring event for 2017 was performed during September 25 through 27, 2017, by TRC personnel and samples were analyzed by Pace in accordance with the SAP. Static water elevation data were collected at all monitoring well locations. Groundwater samples were collected from the six background monitoring wells and 13 downgradient monitoring wells for the Appendix III indicator parameters and field parameters. A summary of the groundwater data collected during the September 2017 event is provided on Table 1 (static groundwater elevation data), Table 2 (analytical results), and Table 3 (field data).

2.3.2 Data Quality Review

Data from each round were evaluated for completeness, overall quality and usability, method-specified sample holding times, precision and accuracy, and potential sample contamination. The data were found to be complete and usable for the purposes of the CCR monitoring program. Particular data non-conformances are summarized in Appendix B.

2.3.3 Groundwater Flow Rate and Direction

Groundwater elevation data collected during the background sampling events showed that groundwater within the uppermost aquifer generally flows to the south-southeast across the Site, with a southwesterly groundwater flow component on the western edge of the Site. Groundwater elevations measured across the Site during the September 2017 sampling event are provided on Table 1 and were used to construct a groundwater contour map (Figure 3).

The map indicates that current groundwater flow is consistent with previous monitoring events since the background sampling events commenced in December 2015. The average hydraulic gradient throughout the Site during this event is estimated at 0.004 ft/ft. The gradient was calculated using the following well pairs: JHC-MW-15029/JHC-MW-15030, JHC-MW-15029/JHC-MW-15005, JHC-MW-15021/JHC-MW-15031 and JHC-MW-15023 / JHC-MW-15037 (Figure 3). Using the mean hydraulic conductivity of 62 ft/day (ARCADIS, 2016) and an assumed effective porosity of 0.4, the estimated average seepage velocity is approximately 0.58 ft/day or 210 ft/year for this event.

The general flow direction is similar to that identified in previous monitoring rounds and continues to demonstrate that the downgradient wells are appropriately positioned to detect the presence of Appendix III parameters that could potentially migrate from the JHC Landfill CCR unit.

Section 3

Statistical Evaluation

3.1 Establishing Background Limits

Per the Stats Plan, background limits were established for the Appendix III indicator parameters following the eighth round of background monitoring using data collected from the seven established background monitoring wells (JHC-MW-15023 through JHC-MW-15028). The statistical evaluation of the background data is presented in detail in Appendix C. The Appendix III background limits will be used throughout the detection monitoring period to determine whether groundwater has been impacted from the JHC Landfill CCR unit by comparing concentrations in the downgradient wells to the background limits for each Appendix III indicator parameter.

3.2 Data Comparison to Background Limits

The concentrations of the indicator parameters in the downgradient wells were compared to the statistical background limits calculated from the background data collected from JHC-MW-15023 through JHC-MW-15028. The comparisons are presented on Table 4.

The statistical evaluation of the September 2017 Appendix III indicator parameters shows potential SSIs over background for:

- Boron at JHC-MW-15017, JHC-MW-15018, JHC-MW-15019, JHC-MW-15020, JHC-MW-15021, JHC-MW-15022, JHC-MW-15031, JHC-MW-15032, JHC-MW-15035, and JHC-MW-15037;
- Calcium at JHC-MW-15018, JHC-MW-15019, JHC-MW-15020, JHC-MW-15022, JHC-MW-15031, JHC-MW-15035, and JHC-MW-15037;
- Chloride at JHC-MW-15017, JHC-MW-15020, JHC-MW-15031;
- Sulfate at JHC-MW-15017, JHC-MW-15018, JHC-MW-15019, JHC-MW-15020, JHC-MW-15021, JHC-MW-15022, JHC-MW-15031, JHC-MW-15035, JHC-MW-15036, and JHC-MW-15037; and
- TDS at JHC-MW-15017, JHC-MW-15018, JHC-MW-15019, JHC-MW-15020, JHC-MW-15021, JHC-MW-15022, JHC-MW-15031, JHC-MW-15035, JHC-MW-15036, and JHC-MW-15037.

The initial observation of an indicator parameter concentration above the established background limits does not necessarily constitute a SSI. Per the Stats Plan, if there is an exceedance of a prediction limit for one or more of the parameters, the well(s) of concern can be resampled within 30 days of the completion of the initial statistical analysis for verification purposes. There were no SSIs compared to background for fluoride or pH at any of the downgradient wells.

Section 4

Conclusions and Recommendations

Potential SSIs over background limits were noted for boron, calcium, chloride, sulfate and TDS in one or more downgradient wells during September 2017. This is the initial detection monitoring event; therefore, it is the initial identification of a SSI over background levels. According to §257.94(e), if the facility determines, pursuant to §257.93(h), that there is a SSI over background levels for one or more of the Appendix III constituents, the facility will, within 90 days of detecting a SSI, establish an assessment monitoring program <or> demonstrate that:

- A source other than the CCR unit caused the SSI, or
- The SSI resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality.

The owner or operator must complete a written demonstration (i.e., Alternative Source Demonstration, ASD), of the above within 90 days of confirming the SSI. Based on the outcome of the ASD the following steps will be taken:

- If a successful ASD is completed, a certification from a qualified professional engineer is required, and the CCR unit may continue with detection monitoring.
- If a successful ASD is not completed within the 90-day period, the owner or operator of the CCR unit must initiate an assessment monitoring program as required under §257.95. The facility must also include the ASD in the annual groundwater monitoring and corrective action report required by §257.90(e), in addition to the certification by a qualified professional engineer.

During the 90-day period after triggering assessment monitoring, groundwater samples will be collected from the groundwater monitoring system wells and analyzed for Appendix IV constituents pursuant to §257.95(b). Within 90 days of obtaining the results from the first assessment monitoring event, groundwater samples will be collected from the groundwater monitoring system wells and analyzed for Appendix III parameters and the detected Appendix IV parameters in the initial assessment monitoring event.

In response to the potential SSIs over background limits noted during September 2017, CEC plans to prepare an ASD to evaluate whether a source other than the JHC Landfill CCR unit caused the SSIs prior to initiating assessment monitoring. Based on the results from the ASD, CEC will continue executing the self-implementing groundwater compliance schedule in conformance with §257.90 - §257.98.

Section 5

References

- ARCADIS. May 13, 2016. Summary of Monitoring Well Design, Installation, and Development – Existing CCR Landfill (Cells 1, 2, 3 and 4). JH Campbell Electric Generation Facility – West Olive, Michigan. Prepared for Consumers Energy Company.
- ARCADIS. May 18, 2016. Electric Generation Facilities RCRA CCR Detection Monitoring Program. JH Campbell Monitoring Program Sample and Analysis Plan, West Olive, Michigan. Prepared for Consumers Energy Company.
- Consumers Power Company. September 1996. Hydrogeological Monitoring Plan for JH Campbell Ash Storage Facility, Consumers Power Company, Solid Waste Disposal Area, Coal Ash, Type III
- TRC Environmental Corporation. October 2017. Groundwater Statistical Evaluation Plan – JH Campbell Power Plant, Dry Ash Landfill, West Olive, Michigan. Prepared for Consumers Energy Company.

Tables

Table 1
 Summary of Groundwater Elevation Data – September 2017
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Well Location	Ground Surface Elevation (ft)	TOC Elevation (ft)	Geologic Unit of Screen Interval	Screen Interval Depth (ft BGS)		Screen Interval Elevation (ft)		Borehole Terminus Depth (ft BGS)	Borehole Terminus Elevation (ft)	September 25, 2017	
				to		to				Depth to Water (ft BTOC)	Groundwater Elevation (ft)
Background											
JHC-MW-15023	617.01	619.98	Sand	14.0	to	24.0	603.0	to	593.0	25.0	592.01
JHC-MW-15024	613.79	616.62	Sand	7.0	to	17.0	606.8	to	596.8	20.0	593.79
JHC-MW-15025	614.14	617.17	Sand	7.0	to	17.0	607.1	to	597.1	20.0	594.14
JHC-MW-15026	615.09	618.04	Sand	8.0	to	18.0	607.1	to	597.1	20.0	595.09
JHC-MW-15027	614.77	617.30	Sand	10.0	to	20.0	604.8	to	594.8	20.0	594.77
JHC-MW-15028	611.02	613.80	Sand	8.0	to	18.0	603.0	to	593.0	20.0	591.02
JHC-MW-15029	608.08	610.95	Sand	8.0	to	18.0	600.1	to	590.1	20.0	588.08
JHC-MW-15030	604.05	607.17	Sand	4.0	to	14.0	600.1	to	590.1	20.0	584.05
Unit 1N, 1S, 2N, 2S											
JHC-MW-15001	607.02	609.53	Sand	3.5	to	8.5	603.5	to	598.5	15.0	592.02
JHC-MW-15002	625.97	628.87	Sand	28.0	to	38.0	598.0	to	588.0	38.0	587.97
JHC-MW-15003	628.31	630.63	Sand	28.0	to	38.0	600.3	to	590.3	38.0	590.31
JHC-MW-15004	624.92	628.44	Sand	24.0	to	34.0	600.9	to	590.9	40.0	584.92
JHC-MW-15005	624.37	627.30	Sand	27.0	to	37.0	597.4	to	587.4	40.0	584.37
Unit 3N, 3S											
JHC-MW-15012	632.59	635.66	Sand	28.0	to	38.0	604.6	to	594.6	38.0	594.59
JHC-MW-15013	632.40	635.25	Sand	28.0	to	38.0	604.4	to	594.4	38.0	594.40
JHC-MW-15015	632.46	635.20	Sand	28.0	to	38.0	604.5	to	594.5	40.0	592.46
JHC-MW-15016	631.81	634.64	Sand	28.0	to	38.0	603.8	to	593.8	40.0	591.81
Landfill											
JHC-MW-15017	613.69	616.61	Sand	10.0	to	20.0	603.7	to	593.7	20.0	593.69
JHC-MW-15018	614.26	617.02	Sand	10.0	to	20.0	604.3	to	594.3	20.0	594.26
JHC-MW-15019	609.81	612.86	Sand	6.0	to	16.0	603.8	to	593.8	16.0	593.81
JHC-MW-15020	609.04	611.90	Sand	6.0	to	16.0	603.0	to	593.0	16.0	593.04
JHC-MW-15021	610.70	613.65	Sand	6.0	to	16.0	604.7	to	594.7	16.0	594.70
JHC-MW-15022	620.92	623.79	Sand	23.0	to	33.0	597.9	to	587.9	33.0	587.92
JHC-MW-15031	632.94	635.87	Sand	33.0	to	43.0	599.9	to	589.9	45.0	587.94
JHC-MW-15032	611.32	614.29	Sand	13.0	to	23.0	598.3	to	588.3	25.0	586.32
JHC-MW-15033	618.08	620.99	Sand	16.0	to	26.0	602.1	to	592.1	30.0	588.08
JHC-MW-15034	612.90	615.97	Sand	11.0	to	21.0	601.9	to	591.9	25.0	587.90
JHC-MW-15035	632.53	634.28	Sand	33.0	to	43.0	599.5	to	589.5	43.5	589.03
JHC-MW-15036	617.94	618.34	Sand	20.0	to	30.0	597.9	to	587.9	30.5	587.44
JHC-MW-15037	614.28	616.06	Sand	23.0	to	28.0	591.3	to	586.3	28.5	585.78
Pond A											
JHC-MW-15006	624.74	627.58	Sand	25.0	to	35.0	599.7	to	589.7	40.0	584.74
JHC-MW-15007	624.82	627.70	Sand	22.0	to	32.0	602.8	to	592.8	40.0	584.82
JHC-MW-15008	632.43	635.30	Sand	28.0	to	38.0	604.4	to	594.4	38.0	594.43
JHC-MW-15009	632.33	635.32	Sand	30.0	to	40.0	602.3	to	592.3	40.0	592.33
JHC-MW-15010	632.55	635.57	Sand	30.0	to	40.0	602.6	to	592.6	40.0	592.55
JHC-MW-15011	627.71	630.83	Sand	27.0	to	37.0	600.7	to	590.7	40.0	587.71

Notes:

Survey conducted by Nederveld, November 2015

Elevation in feet relative to North American Vertical Datum 1988 (NAVD 88).

TOC: Top of well casing.

ft BTOC: Feet below top of well casing.

ft BGS: Feet below ground surface.

Table 2
 Summary of Groundwater Sampling Results (Analytical) – September 2017
 JH Campbell Landfill – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15023	JHC-MW-15024	JHC-MW-15025	JHC-MW-15026	JHC-MW-15027	JHC-MW-15028	JHC-MW-15029	JHC-MW-15017	JHC-MW-15018	JHC-MW-15019
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	background							downgradient		
Appendix III															
Boron	ug/L	NC	500	500	7,200	40.1	<20.0	29.5	<20.0	<20.0	<20.0	405	127	191	
Calcium	mg/L	NC	NC	NC	500	7.9	28.5	22.5	4.7	9.7	12.7	44.8	55.3	58.3	
Chloride	mg/L	250**	250	250	500	4.3	31.3	19.7	2.2	1.8	<1.0	119	41.5	36.7	
Fluoride	ug/L	4,000	NC	NC	NC	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0		5.8	7.3	7.3	6.1	6.7	8.8	5.2	6.3	6.4	
Sulfate	mg/L	250**	250	250	500	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	101	80.8	48.8	
Total Dissolved Solids	mg/L	500**	500	500	500	<50.0	142	132	64	112	54	490	310	306	

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 2
 Summary of Groundwater Sampling Results (Analytical) – September 2017
 JH Campbell Landfill – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location:						JHC-MW-15020	JHC-MW-15021	JHC-MW-15022	JHC-MW-15031	JHC-MW-15032	JHC-MW-15033	JHC-MW-15034	JHC-MW-15035	JHC-MW-15036	JHC-MW-15037
Sample Date:						9/27/2017	9/27/2017	9/27/2017	9/27/2017	9/26/2017	9/26/2017	9/26/2017	9/26/2017	9/26/2017	
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI [^]	downgradient									
Appendix III															
Boron	ug/L	NC	500	500	7,200	153	182	340	95.6	57.8	34.1	51.4	126	41.3	114
Calcium	mg/L	NC	NC	NC	500	49.5	37.0	103	68.5	6.8	10.1	6.0	107	34.5	76.0
Chloride	mg/L	250**	250	250	500	54.7	40.9	2.4	47.5	3.2	1.4	2.2	35.9	13.5	30.3
Fluoride	ug/L	4,000	NC	NC	NC	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0		6.5	6.5	7.0	6.8	6.0	6.7	6.0	7.0	7.5	7.3
Sulfate	mg/L	250**	250	250	500	29.4	25.9	43.7	38.9	<2.0	<2.0	<2.0	35.6	14.9	45.3
Total Dissolved Solids	mg/L	500**	500	500	500	278	280	406	386	84	<50.0	<50.0	512	300	376

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

[^] - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3

Summary of Field Parameter Results – September 2017
 JH Campbell Landfill – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location	Sample Date	Dissolved Oxygen (mg/L)	Oxidation Reduction Potential (mV)	pH	Specific Conductivity (umhos/cm)	Temperature (°C)	Turbidity (NTU)
Background							
JHC-MW-15023	9/26/2017	0.86	84.1	5.8	85	12.70	2.16
JHC-MW-15024	9/26/2017	1.36	94.2	7.3	325	12.81	1.74
JHC-MW-15025	9/25/2017	3.69	74.5	7.3	228	13.68	1.36
JHC-MW-15026	9/25/2017	6.03	46.1	6.1	46	13.40	1.83
JHC-MW-15027	9/25/2017	5.21	18.4	6.7	80	12.27	2.58
JHC-MW-15028	9/25/2017	6.34	2.7	8.8	94	15.15	2.41
Landfill							
JHC-MW-15017	9/27/2017	4.27	99.0	5.2	691	16.32	1.27
JHC-MW-15018	9/27/2017	1.36	87.3	6.3	500	15.55	2.11
JHC-MW-15019	9/27/2017	2.48	116.4	6.4	496	15.12	1.62
JHC-MW-15020	9/27/2017	0.32	108.7	6.5	467	15.76	16.2
JHC-MW-15021	9/27/2017	1.16	106.0	6.5	385	15.12	3.62
JHC-MW-15022	9/27/2017	3.60	103.1	7.0	662	12.39	2.57
JHC-MW-15031	9/27/2017	1.00	103.7	6.8	602	14.49	1.99
JHC-MW-15032	9/26/2017	3.73	82.6	6.0	73	13.54	1.73
JHC-MW-15033	9/26/2017	3.27	81.9	6.7	89	13.31	1.57
JHC-MW-15034	9/26/2017	4.15	83.3	6.0	67	14.17	1.25
JHC-MW-15035	9/26/2017	0.58	118.2	7.0	779	17.54	1.55
JHC-MW-15036	9/26/2017	0.60	107.3	7.5	290	15.54	1.63
JHC-MW-15037	9/26/2017	3.11	112.8	7.3	611	14.39	1.39

Notes:

mg/L - Milligrams per Liter.

mV - Millivolts.

SU - Standard units.

umhos/cm - Micromhos per centimeter.

NTU - Nephelometric Turbidity Unit.

Table 4
 Comparison of Appendix III Parameter Results to Background Limits – September 2017
 JH Campbell Landfill – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location:		JHC-MW-15017	JHC-MW-15018	JHC-MW-15019	JHC-MW-15020	JHC-MW-15021	JHC-MW-15022	JHC-MW-15031
Sample Date:		9/27/2017	9/27/2017	9/27/2017	9/27/2017	9/27/2017	9/27/2017	9/27/2017
Constituent	Unit	UTL	downgradient					
Appendix III								
Boron	ug/L	51	405	127	191	153	182	340
Calcium	mg/L	46	44.8	55.3	58.3	49.5	37.0	103
Chloride	mg/L	43	119	41.5	36.7	54.7	40.9	2.4
Fluoride	ug/L	1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000
pH, Field	SU	4.8 - 9.2	5.2	6.3	6.4	6.5	6.5	7.0
Sulfate	mg/L	14	101	80.8	48.8	29.4	25.9	43.7
Total Dissolved Solids	mg/L	258	490	310	306	278	280	406

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

All metals were analyzed as total unless otherwise specified.

RESULT

Shading and bold font indicates an exceedance
of the Upper Tolerance Limit (UTL) using the
number of significant figures in the UTL.

Table 4
 Comparison of Appendix III Parameter Results to Background Limits – September 2017
 JH Campbell Landfill – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location:			JHC-MW-15032	JHC-MW-15033	JHC-MW-15034	JHC-MW-15035	JHC-MW-15036	JHC-MW-15037
Sample Date:			9/26/2017	9/26/2017	9/26/2017	9/26/2017	9/26/2017	9/26/2017
Constituent	Unit	UTL	downgradient					
Appendix III								
Boron	ug/L	51	57.8	34.1	51.4	126	41.3	114
Calcium	mg/L	46	6.8	10.1	6.0	107	34.5	76.0
Chloride	mg/L	43	3.2	1.4	2.2	35.9	13.5	30.3
Fluoride	ug/L	1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000
pH, Field	SU	4.8 - 9.2	6.0	6.7	6.0	7.0	7.5	7.3
Sulfate	mg/L	14	<2.0	<2.0	<2.0	35.6	14.9	45.3
Total Dissolved Solids	mg/L	258	84	<50.0	<50.0	512	300	376

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

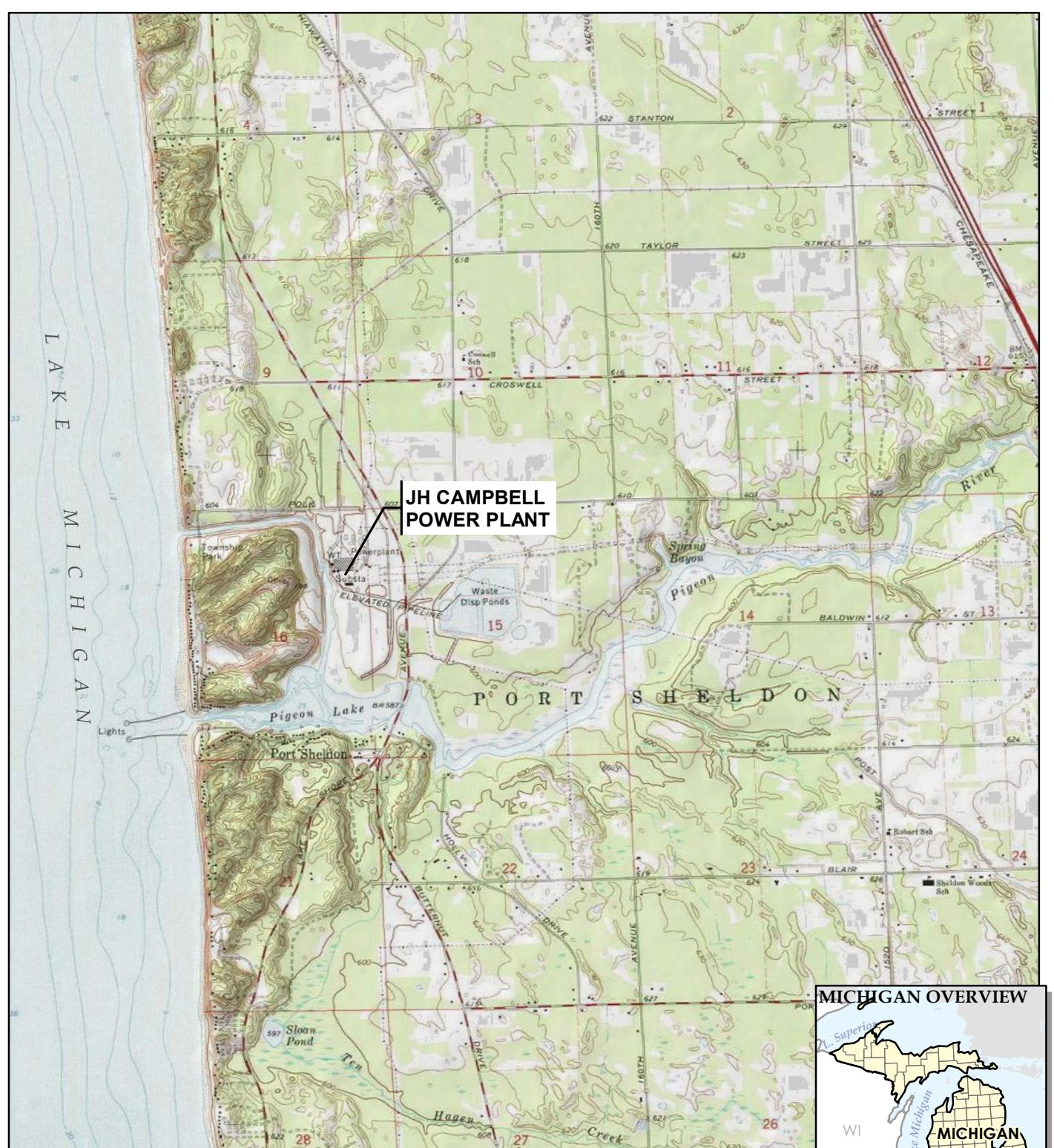
SU - standard units; pH is a field parameter.

All metals were analyzed as total unless otherwise specified.

RESULT

Shading and bold font indicates an exceedance of the Upper Tolerance Limit (UTL) using the number of significant figures in the UTL.

Figures



BASE MAP FROM USGS 7.5 MINUTE TOPOGRAPHIC QUADRANGLE SERIES.



1" = 3,000' 0 3,000 6,000
1:36,000 FEET



PROJECT:

**CONSUMERS ENERGY COMPANY
JH CAMPBELL POWER PLANT
WEST OLIVE, MICHIGAN**

TITLE:

SITE LOCATION MAP

DRAWN BY:

J. PAPEZ

CHECKED BY:

S. HOLMSTROM

APPROVED BY:

G. CROCKFORD

DATE:

JANUARY 2018

PROJ. NO.:

269767-005

FILE:

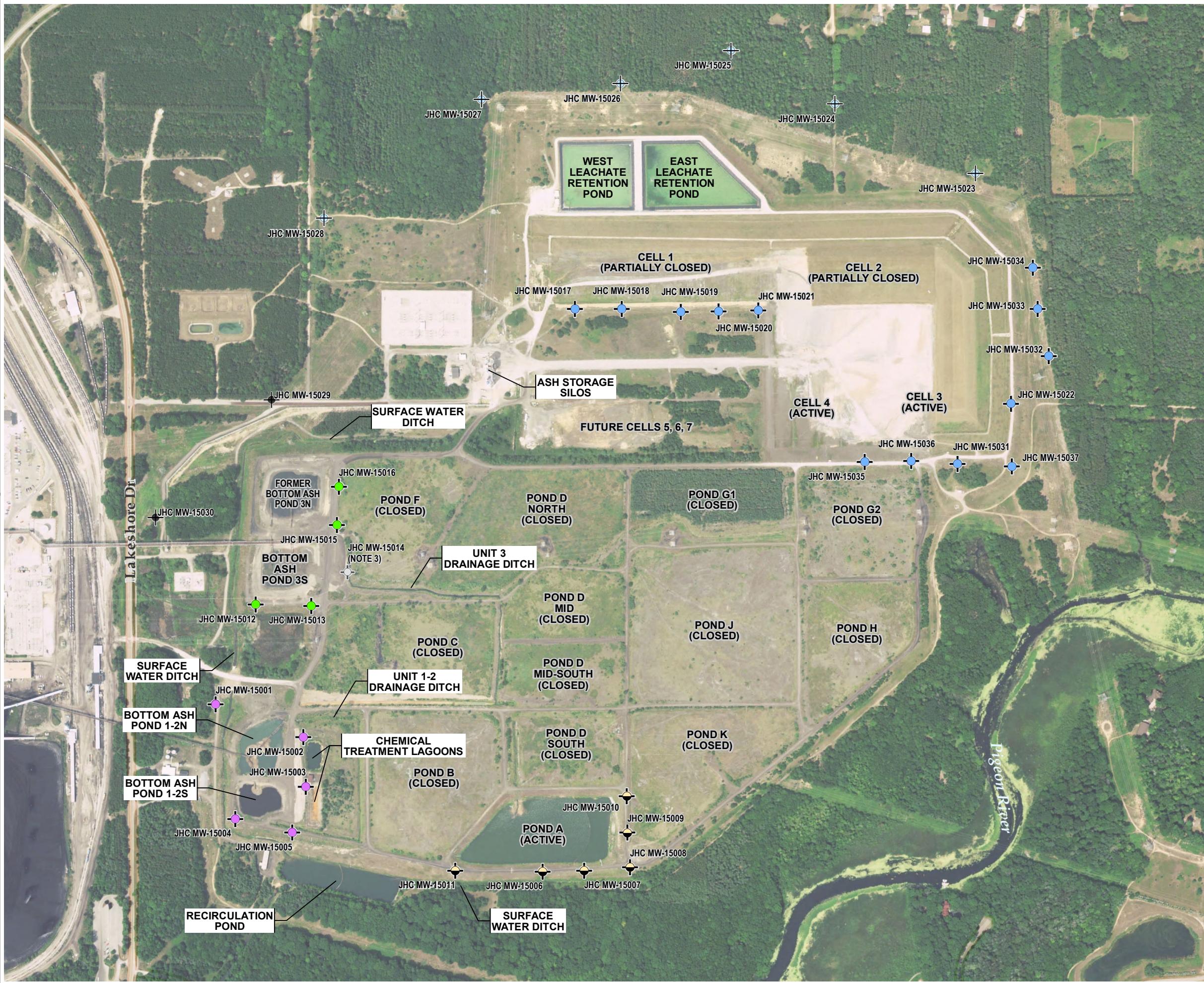
269767-005-009SLM.mxd

FIGURE 1



1540 Eisenhower Place
Ann Arbor, MI 48108-3284
Phone: 734.971.7080

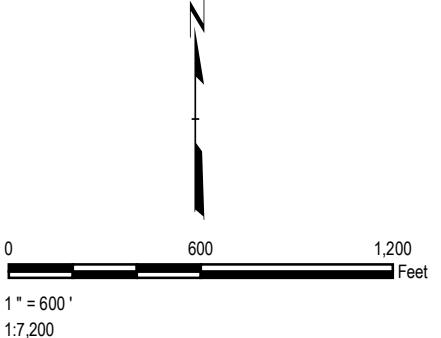
TRC - GIS

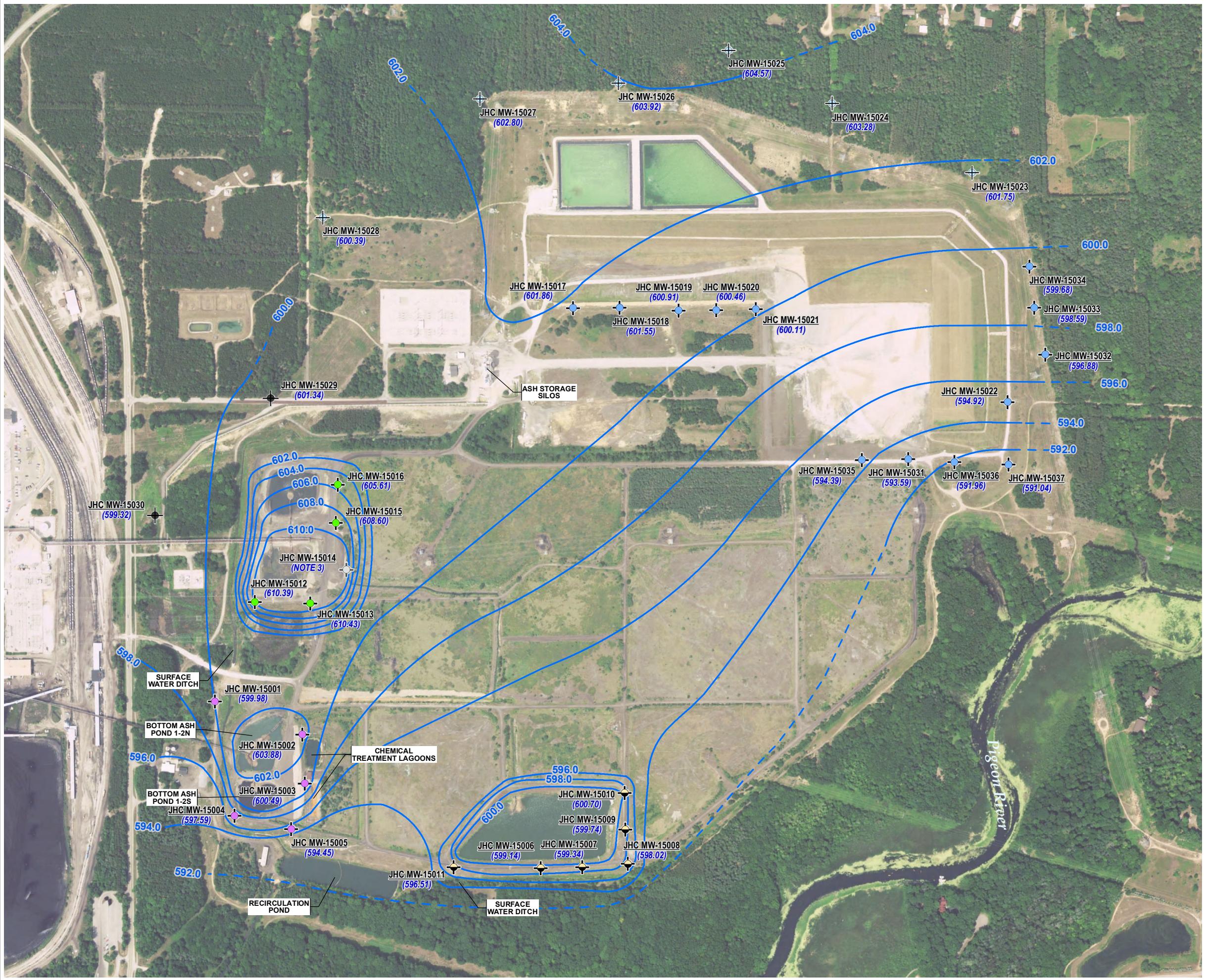
**LEGEND**

- ⊕ BACKGROUND MONITORING WELL
- DOWNGRADIENT BOTTOM ASH POND
- 1/2 N/S MONITORING WELL
- 3 N/S MONITORING WELL
- DOWNGRADIENT LANDFILL MONITORING WELL
- DOWNGRADIENT POND A MONITORING WELL
- MONITORING WELL (STATIC WATER LEVEL ONLY)
- ⊕ DECOMMISSIONED MONITORING WELL

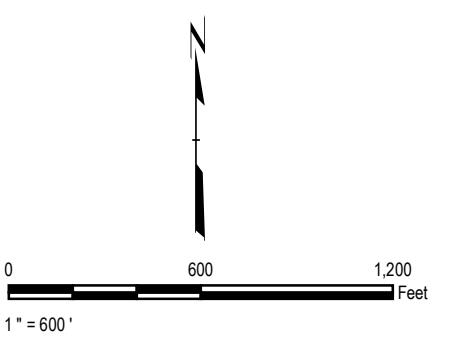
NOTES

1. BASE MAP IMAGERY FROM USDA – NATIONAL AGRICULTURE IMAGERY PROGRAM, 7/20/2016.
2. WELL LOCATIONS SURVEYED BY NEDERVELD ON 11/25/2015.
3. MONITORING WELL DECOMMISSIONED NOVEMBER 13, 2017.



**NOTES**

1. BASE MAP IMAGERY FROM USDA-NATIONAL AGRICULTURE IMAGERY PROGRAM, 7/20/2016.
2. WELL LOCATIONS SURVEYED BY NEDERVELD ON 11/25/2015.
3. MONITORING WELL DECOMMISSIONED NOVEMBER 13, 2017.
4. GROUNDWATER ELEVATIONS DISPLAYED IN FEET RELATIVE TO THE NORTH AMERICAN VERTICAL DATUM OF 1988.



PROJECT:	CONSUMERS ENERGY COMPANY JH CAMPBELL POWER PLANT WEST OLIVE, MICHIGAN	
TITLE:	GROUNDWATER CONTOUR MAP SEPTEMBER 25, 2017	
DRAWN BY:	S. MAJOR	PROJ NO.:
CHECKED BY:	C. SCIESZKA	269767-001
APPROVED BY:	S. HOLMSTROM	
DATE:	JANUARY 2018	

1540 Eisenhower Place
Ann Arbor, MI 48108-3284
Phone: 734.971.7080
www.trcsolutions.com

FIGURE 3
FILE NO.: 269767-005-012.mxd

Appendix A

Background Data

Table 1
 Summary of Groundwater Elevation Data
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Well Location	Ground Surface Elevation (ft)	TOC Elevation (ft)	Geologic Unit of Screen Interval	Screen Interval Depth (ft BGS)	Screen Interval Elevation (ft)	Borehole Terminus Depth (ft BGS)	Borehole Terminus Elevation (ft)	Round 1		Round 2		Round 3		Round 4					
								December 2, 2015		March 7, 2016		June 21, 2016		August 29, 2016					
								Depth to Water (ft BTOC)	Groundwater Elevation (ft)	Depth to Water (ft BTOC)	Groundwater Elevation (ft)	Depth to Water (ft BTOC)	Groundwater Elevation (ft)	Depth to Water (ft BTOC)	Groundwater Elevation (ft)				
Background																			
JHC-MW-15023	617.01	619.98	Sand	14.0	to	24.0	603.0	to	593.0	25.0	592.01	19.01	600.97	17.51	602.47	17.14	602.84	17.40	602.58
JHC-MW-15024	613.79	616.62	Sand	7.0	to	17.0	606.8	to	596.8	20.0	593.79	14.38	602.24	13.05	603.57	12.46	604.16	12.71	603.91
JHC-MW-15025	614.14	617.17	Sand	7.0	to	17.0	607.1	to	597.1	20.0	594.14	13.81	603.36	12.65	604.52	11.76	605.41	11.94	605.23
JHC-MW-15026	615.09	618.04	Sand	8.0	to	18.0	607.1	to	597.1	20.0	595.09	15.72	602.32	14.68	603.36	13.39	604.65	13.74	604.30
JHC-MW-15027	614.77	617.30	Sand	10.0	to	20.0	604.8	to	594.8	20.0	594.77	16.26	601.04	15.34	601.96	13.62	603.68	14.23	603.07
JHC-MW-15028	611.02	613.80	Sand	8.0	to	18.0	603.0	to	593.0	20.0	591.02	14.80	599.00	13.91	599.89	12.88	600.92	13.09	600.71
JHC-MW-15029	608.08	610.95	Sand	8.0	to	18.0	600.1	to	590.1	20.0	588.08	9.77	601.18	9.45	601.50	10.31	600.64	8.60	602.35
JHC-MW-15030	604.05	607.17	Sand	4.0	to	14.0	600.1	to	590.1	20.0	584.05	7.52	599.65	7.03	600.14	8.65	598.52	7.17	600.00
Unit 1N, 1S, 2N, 2S																			
JHC-MW-15001	607.02	609.53	Sand	3.5	to	8.5	603.5	to	598.5	15.0	592.02	9.25	600.28	9.08	600.45	9.83	599.70	9.30	600.23
JHC-MW-15002	625.97	628.87	Sand	28.0	to	38.0	598.0	to	588.0	38.0	587.97	24.83	604.04	23.95	604.92	25.49	603.38	24.63	604.24
JHC-MW-15003	628.31	630.63	Sand	28.0	to	38.0	600.3	to	590.3	38.0	590.31	28.15	602.48	29.95	600.68	30.80	599.83	29.50	601.13
JHC-MW-15004	624.92	628.44	Sand	24.0	to	34.0	600.9	to	590.9	40.0	584.92	29.67	598.77	31.33	597.11	31.58	596.86	30.29	598.15
JHC-MW-15005	624.37	627.30	Sand	27.0	to	37.0	597.4	to	587.4	40.0	584.37	31.53	595.77	33.14	594.16	33.29	594.01	32.53	594.77
Unit 3N, 3S																			
JHC-MW-15012	632.59	635.66	Sand	28.0	to	38.0	604.6	to	594.6	38.0	594.59	27.16	608.50	23.99	611.67	34.68	600.98	32.65	603.01
JHC-MW-15013	632.40	635.25	Sand	28.0	to	38.0	604.4	to	594.4	38.0	594.40	24.67	610.58	22.62	612.63	33.16	602.09	30.55	604.70
JHC-MW-15014*	635.13	638.18	Sand	39.0	to	49.0	596.1	to	586.1	50.0	585.13	28.69	609.49	27.29	610.89	NA*	--	NA*	--
JHC-MW-15015	632.46	635.20	Sand	28.0	to	38.0	604.5	to	594.5	40.0	592.46	27.52	607.68	26.30	608.90	33.44	601.76	26.98	608.22
JHC-MW-15016	631.81	634.64	Sand	28.0	to	38.0	603.8	to	593.8	40.0	591.81	29.72	604.92	29.19	605.45	33.10	601.54	26.72	607.92
Landfill																			
JHC-MW-15017	613.69	616.61	Sand	10.0	to	20.0	603.7	to	593.7	20.0	593.69	15.73	600.88	15.09	601.52	14.43	602.18	14.35	602.26
JHC-MW-15018	614.26	617.02	Sand	10.0	to	20.0	604.3	to	594.3	20.0	594.26	16.57	600.45	15.88	601.14	15.19	601.83	15.29	601.73
JHC-MW-15019	609.81	612.86	Sand	6.0	to	16.0	603.8	to	593.8	16.0	593.81	12.99	599.87	12.23	600.63	11.57	601.29	11.77	601.09
JHC-MW-15020	609.04	611.90	Sand	6.0	to	16.0	603.0	to	593.0	16.0	593.04	12.45	599.45	11.72	600.18	11.04	600.86	11.31	600.59
JHC-MW-15021	610.70	613.65	Sand	6.0	to	16.0	604.7	to	594.7	16.0	594.70	14.57	599.08	13.74	599.91	13.14	600.51	13.45	600.20
JHC-MW-15022	620.92	623.79	Sand	23.0	to	33.0	597.9	to	587.9	33.0	587.92	29.45	594.34	28.43	595.36	28.27	595.52	28.60	595.19
JHC-MW-15031	632.94	635.87	Sand	33.0	to	43.0	599.9	to	589.9	45.0	587.94	43.34	592.53	42.72	593.15	42.33	593.54	42.67	593.20
JHC-MW-15032	611.32	614.29	Sand	13.0	to	23.0	598.3	to	588.3	25.0	586.32	17.88	596.41	16.64	597.65	16.55	597.74	16.83	597.46
JHC-MW-15033	618.08	620.99	Sand	16.0	to	26.0	602.1	to	592.1	30.0	588.08	22.94	598.05	21.54	599.45	21.41	599.58	21.69	599.30
JHC-MW-15034	612.90	615.97	Sand	11.0	to	21.0	601.9	to	591.9	25.0	587.90	16.90	599.07	15.45	600.52	15.23	600.74	15.54	600.43
JHC-MW-15035	632.53	634.28	Sand	33.0	to	43.0	599.5	to	589.5	43.5	589.03	40.64	593.64	40.02	594.26	39.58	594.70	39.92	594.36
JHC-MW-15036	617.94	618.34	Sand	20.0	to	30.0	597.9	to	587.9	30.5									

Table 1
 Summary of Groundwater Elevation Data
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Well Location	Ground Surface Elevation (ft)	TOC Elevation (ft)	Geologic Unit of Screen Interval	Screen Interval Depth (ft BGS)	Screen Interval Elevation (ft)	Round 5		Round 6		Round 7		Round 8	
						November 14, 2016		April 17, 2017		June 19, 2017		August 14, 2017	
						Depth to Water (ft BTOC)	Groundwater Elevation (ft)	Depth to Water (ft BTOC)	Groundwater Elevation (ft)	Depth to Water (ft BTOC)	Groundwater Elevation (ft)	Depth to Water (ft BTOC)	Groundwater Elevation (ft)
Background													
JHC-MW-15023	617.01	619.98	Sand	14.0 to 24.0	603.0 to 593.0	17.46	602.52	15.81	604.17	16.63	603.35	17.57	602.41
JHC-MW-15024	613.79	616.62	Sand	7.0 to 17.0	606.8 to 596.8	12.93	603.69	11.28	605.34	11.72	604.90	12.65	603.97
JHC-MW-15025	614.14	617.17	Sand	7.0 to 17.0	607.1 to 597.1	12.41	604.76	10.63	606.54	11.03	606.14	12.08	605.09
JHC-MW-15026	615.09	618.04	Sand	8.0 to 18.0	607.1 to 597.1	14.36	603.68	12.54	605.50	12.67	605.37	13.80	604.24
JHC-MW-15027	614.77	617.30	Sand	10.0 to 20.0	604.8 to 594.8	14.88	602.42	12.87	604.43	13.13	604.17	13.75	603.55
JHC-MW-15028	611.02	613.80	Sand	8.0 to 18.0	603.0 to 593.0	13.33	600.47	12.07	601.73	12.24	601.56	15.51	598.29
JHC-MW-15029	608.08	610.95	Sand	8.0 to 18.0	600.1 to 590.1	8.50	602.45	10.46	600.49	9.11	601.84	9.40	601.55
JHC-MW-15030	604.05	607.17	Sand	4.0 to 14.0	600.1 to 590.1	7.06	600.11	7.50	599.67	7.29	599.88	7.66	599.51
Unit 1N, 1S, 2N, 2S													
JHC-MW-15001	607.02	609.53	Sand	3.5 to 8.5	603.5 to 598.5	9.11	600.42	9.23	600.30	8.90	600.63	9.35	600.18
JHC-MW-15002	625.97	628.87	Sand	28.0 to 38.0	598.0 to 588.0	24.18	604.69	25.37	603.50	22.29	606.58	25.26	603.61
JHC-MW-15003	628.31	630.63	Sand	28.0 to 38.0	600.3 to 590.3	29.91	600.72	30.75	599.88	28.30	602.33	30.92	599.71
JHC-MW-15004	624.92	628.44	Sand	24.0 to 34.0	600.9 to 590.9	31.21	597.23	31.24	597.20	30.00	598.44	31.77	596.67
JHC-MW-15005	624.37	627.30	Sand	27.0 to 37.0	597.4 to 587.4	33.04	594.26	33.29	594.01	32.39	594.91	33.30	594.00
Unit 3N, 3S													
JHC-MW-15012	632.59	635.66	Sand	28.0 to 38.0	604.6 to 594.6	32.05	603.61	26.23	609.43	23.64	612.02	24.00	611.66
JHC-MW-15013	632.40	635.25	Sand	28.0 to 38.0	604.4 to 594.4	29.69	605.56	25.31	609.94	21.58	613.67	23.57	611.68
JHC-MW-15014*	635.13	638.18	Sand	39.0 to 49.0	596.1 to 586.1	NA*	--	NA*	--	NA*	--	NA*	--
JHC-MW-15015	632.46	635.20	Sand	28.0 to 38.0	604.5 to 594.5	25.99	609.21	31.23	603.97	24.64	610.56	25.74	609.46
JHC-MW-15016	631.81	634.64	Sand	28.0 to 38.0	603.8 to 593.8	26.29	608.35	33.97	600.67	28.10	606.54	28.44	606.20
Landfill													
JHC-MW-15017	613.69	616.61	Sand	10.0 to 20.0	603.7 to 593.7	14.63	601.98	13.60	603.01	13.71	602.90	14.12	602.49
JHC-MW-15018	614.26	617.02	Sand	10.0 to 20.0	604.3 to 594.3	15.48	601.54	14.44	602.58	14.50	602.52	14.90	602.12
JHC-MW-15019	609.81	612.86	Sand	6.0 to 16.0	603.8 to 593.8	11.98	600.88	10.91	601.95	10.95	601.91	11.33	601.53
JHC-MW-15020	609.04	611.90	Sand	6.0 to 16.0	603.0 to 593.0	11.42	600.48	10.41	601.49	10.39	601.51	10.81	601.09
JHC-MW-15021	610.70	613.65	Sand	6.0 to 16.0	604.7 to 594.7	13.55	600.10	12.60	601.05	12.54	601.11	12.90	600.75
JHC-MW-15022	620.92	623.79	Sand	23.0 to 33.0	597.9 to 587.9	28.55	595.24	27.66	596.13	27.93	595.86	28.45	595.34
JHC-MW-15031	632.94	635.87	Sand	33.0 to 43.0	599.9 to 589.9	42.74	593.13	42.08	593.79	41.97	593.90	42.33	593.54
JHC-MW-15032	611.32	614.29	Sand	13.0 to 23.0	598.3 to 588.3	16.79	597.50	15.67	598.62	16.26	598.03	16.92	597.37
JHC-MW-15033	618.08	620.99	Sand	16.0 to 26.0	602.1 to 592.1	21.68	599.31	20.37	600.62	21.08	599.91	21.85	599.14
JHC-MW-15034	612.90	615.97	Sand	11.0 to 21.0	601.9 to 591.9	15.50	600.47	14.08	601.89	14.83	601.14	15.96	600.01
JHC-MW-15035	632.53	634.28	Sand	33.0 to 43.0	599.5 to 589.5	40.00	594.28	39.28	595.00	39.08	595.20	39.52	594.76
JHC-MW-15036	617.94	618.34	Sand	20.0 to 30.0	597.9 to 587.9	26.35	591.99	25.74	592.60	25.71	592.63	26.09	592.25
JHC-MW-15037	614.28	616.06	Sand	23.0 to 28.0	591.3 to 586.3	24.85	591.21	24.27	591.79	24.37	591.69	24.77	591.29
Pond A													
JHC-MW-15006	624.74	627.58	Sand	25.0 to 35.0	599.7 to 589.7	28.97	598.61	27.80	599.78	28.38	599.20	28.75	598.83
JHC-MW-15007	624.82	627.70	Sand	22.0 to 32.0	602.8 to 592.8	29.19	598.51	27.28	600.42	28.41	599.29	28.85	598.85
JHC-MW-15008	632.43	635.30	Sand	28.0 to 38.0	604.4 to 594.4	37.91	597.39	35.58	599.72	37.47	597.83	37.78	597.52
JHC-MW-15009	632.33	635.32	Sand	30.0 to 40.0	602.3 to 592.3	36.85	598.47	32.88	602.44	36.00	599.32	36.39	598.93
JHC-MW-15010	632.55	635.57	Sand	30.0 to 40.0	602.6 to 592.6	36.35	599.22	32.35	603.22	35.17	600.40	35.66	599.91
JHC-MW-15011	627.71	630.83	Sand	27.0 to 37.0	600.7 to 590.7	34.58	596.25	33.77	597.06	34.32	596.51</td		

Table 2
 Summary of Analytical Results for Background Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15023							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	background							
Appendix III													
Boron	ug/L	NC	500	500	7,200	51	43	37	42	48	49	37.9	48.0
Calcium	mg/L	NC	NC	NC	500	16.1	16.9	9.89	12.3	15.5	9.60	5.3	5.8
Chloride	mg/L	250**	250	250	500	6.44	5.92	2.17	2.90	5.44	2.25	<1.0	1.8
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.26	5.8	5.5	5.6	5.8	5.5	5.79	5.76
Sulfate	mg/L	250**	250	250	500	10.5	12.3	14.1	12.6	12.3	13.7	10	12.9
Total Dissolved Solids	mg/L	500**	500	500	500	71	78	68	77	83	78	<50.0	60
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	2	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	22	33	23	20	26	35	21.7	23.2
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3.0	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	<1	<1	<1	<1	2	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.182	<0.163	<0.189	<0.328	<0.175	<0.26	<0.687	<0.686
Radium-226/228	pCi/L	5	NC	NC	NC	0.838	1.20	0.780	0.906	0.880	1.14	<1.35	<1.51
Radium-228	pCi/L	5	NC	NC	NC	0.672	1.05	0.652	0.780	0.827	1.01	<0.662	<0.819
Selenium	ug/L	50	50	50	5	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criterion based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 2
 Summary of Analytical Results for Background Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15024							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	background							
Appendix III													
Boron	ug/L	NC	500	500	7,200	22	22	<20	23	23	27	22.6	24.8
Calcium	mg/L	NC	NC	NC	500	31.0	41.7	41.5	42.4	35.0	37.4	34.6	33.4
Chloride	mg/L	250**	250	250	500	25.2	36.5	33.0	42.0	21.8	33.6	42.4	43.4
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	7.35	7.3	7.3	7.4	7.1	7.5	7.67	7.36
Sulfate	mg/L	250**	250	250	500	9.85	9.32	9.20	9.59	8.38	9.20	8.1	10.9
Total Dissolved Solids	mg/L	500**	500	500	500	180	200	210	270	180	210	176	218
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<1	<10	<1.0
Barium	ug/L	2,000	2,000	2,000	670	18	19	19	21	19	19	18.5	18.1
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3.0	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	<1	<1	<1	1	2	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.179	<0.238	<0.196	0.317	<0.245	0.245	<0.701	<0.709
Radium-226/228	pCi/L	5	NC	NC	NC	0.631	0.548	<0.576	0.568	<0.514	<0.641	<1.40	<1.55
Radium-228	pCi/L	5	NC	NC	NC	0.523	0.548	<0.576	<0.473	<0.514	<0.641	<0.697	<0.841
Selenium	ug/L	50	50	50	5	<1	<1	<1	<1	1	<1	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criterion based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 2
 Summary of Analytical Results for Background Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15025							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	background							
Appendix III													
Boron	ug/L	NC	500	500	7,200	32	25	<20	23	27	20	20.7	25.4
Calcium	mg/L	NC	NC	NC	500	29.5	31.0	20.2	25.7	25.4	20.5	18.9	17.1
Chloride	mg/L	250**	250	250	500	29.7	26.2	19.3	34.1	22.3	19.9	27.1	15.9
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	8.08	8.0	7.4	7.4	7.5	7.5	7.43	7.29
Sulfate	mg/L	250**	250	250	500	10.6	8.07	8.03	8.19	8.83	7.56	7.3	10.4
Total Dissolved Solids	mg/L	500**	500	500	500	170	160	120	200	150	120	66	154
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	7	7	15	10	7	11	10.1	7.8
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3.0	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	1	<1	1	2	2	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.313	<0.176	<0.191	<0.270	<0.198	<0.360	<0.820	<0.763
Radium-226/228	pCi/L	5	NC	NC	NC	0.714	0.666	0.676	1.09	<0.498	0.919	<1.50	<1.54
Radium-228	pCi/L	5	NC	NC	NC	0.629	0.623	0.565	0.997	<0.498	0.690	0.794	<0.772
Selenium	ug/L	50	50	50	5	<1	<1	3	<1	<1	<1	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criterion based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 2
 Summary of Analytical Results for Background Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15026							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	background							
Appendix III													
Boron	ug/L	NC	500	500	7,200	<20	<20	<20	<20	<20	<20	<20.0	<20.0
Calcium	mg/L	NC	NC	NC	500	<1	7.83	11.1	11.9	7.68	5.81	4.1	8.6
Chloride	mg/L	250**	250	250	500	1.13	2.32	5.95	6.94	3.03	4.37	3.0	5.9
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.44	6.2	5.7	6.6	6.2	5.9	6.15	6.76
Sulfate	mg/L	250**	250	250	500	7.59	7.02	7.88	7.82	8.07	6.62	5.2	9.4
Total Dissolved Solids	mg/L	500**	500	500	500	40	43	62	79	47	34	68	156
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	9	9	13	12	9	9	7.1	9.4
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3.0	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	1	<1	<1	1	1	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.156	<0.170	<0.176	<0.248	<0.218	<0.357	<0.897	<0.803
Radium-226/228	pCi/L	5	NC	NC	NC	1.12	<0.557	1.70	1.58	2.85	1.36	<1.61	1.75
Radium-228	pCi/L	5	NC	NC	NC	1.06	<0.557	1.62	1.58	2.85	1.18	1.01	1.12
Selenium	ug/L	50	50	50	5	<1	<1	2	<1	<1	<1	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criterion based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 2
 Summary of Analytical Results for Background Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15027							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	background							
Appendix III													
Boron	ug/L	NC	500	500	7,200	23	<20	<20	<20	<20	<20	<20.0	<20.0
Calcium	mg/L	NC	NC	NC	500	27.3	16.4	19.6	18.3	18.2	9.06	6.0	8.7
Chloride	mg/L	250**	250	250	500	7.25	3.04	11.7	8.93	5.90	2.64	1.4	1.6
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.75	6.9	6.7	6.2	6.8	6.5	6.46	6.77
Sulfate	mg/L	250**	250	250	500	10.4	9.91	9.16	8.75	8.89	9.26	6.7	9.0
Total Dissolved Solids	mg/L	500**	500	500	500	120	80	100	89	85	57	70	50
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	15	13	22	16	14	11	31.7	10.8
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3.0	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	1	<1	1	1	1	2	1.1	1.1
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.199	<0.239	<0.165	<0.218	<0.266	<0.418	<0.842	<0.628
Radium-226/228	pCi/L	5	NC	NC	NC	0.900	0.738	0.777	1.18	2.51	0.897	1.87	<1.36
Radium-228	pCi/L	5	NC	NC	NC	0.900	0.738	0.759	1.18	2.43	0.702	1.45	0.964
Selenium	ug/L	50	50	50	5	<1	<1	2	<1	<1	<1	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criterion based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 2
 Summary of Analytical Results for Background Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15028							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	background							
Appendix III													
Boron	ug/L	NC	500	500	7,200	26	<20	<20	<20	20	<20	<20.0	<20.0
Calcium	mg/L	NC	NC	NC	500	13.1	16.0	11.4	14.4	12.6	10.4	13.7	11.4
Chloride	mg/L	250**	250	250	500	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	8.24	8.7	7.9	7.5	8.4	8.1	8.79	8.83
Sulfate	mg/L	250**	250	250	500	5.08	5.10	5.05	4.93	5.08	5.87	3.3	5.3
Total Dissolved Solids	mg/L	500**	500	500	500	63	60	61	69	64	56	<50.0	54
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	<5	<5	<5	<5	<5	5	5.3	5.4
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3.0	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	<1	<1	<1	1	1	1.2	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.181	<0.149	0.166	<0.189	<0.181	<0.346	<0.566	<0.905
Radium-226/228	pCi/L	5	NC	NC	NC	<0.573	0.461	<0.529	<0.519	<0.522	<0.714	<1.12	<1.87
Radium-228	pCi/L	5	NC	NC	NC	<0.573	0.446	<0.529	<0.519	<0.522	<0.714	0.666	<0.962
Selenium	ug/L	50	50	50	5	3	5	3	2	4	3	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criterion based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 2
 Summary of Analytical Results for Background Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15029							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	background							
Appendix III													
Boron	ug/L	NC	500	500	7,200	178	227	310	404	401	251	418	435
Calcium	mg/L	NC	NC	NC	500	29.2	6.40	28.6	32.3	32.0	50.7	29.3	24.7
Chloride	mg/L	250**	250	250	500	20.3	14.2	17.1	13.1	12.7	67.4	15.7	15.5
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	8.5	8.6	8.3	8.0	8.3	7.1	8.34	8.46
Sulfate	mg/L	250**	250	250	500	32.9	33.2	30.1	32.0	33.7	53.6	40.5	38.6
Total Dissolved Solids	mg/L	500**	500	500	500	160	150	160	230	170	320	232	154
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	<5	<5	<5	<5	<5	15	3.4	3.0
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3.0	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	<1	<1	<1	<1	5	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	6	7	<5	6	6	9.9	12.6
Radium-226	pCi/L	5	NC	NC	NC	<0.153	<0.154	0.226	<0.198	<0.169	<0.363	<0.725	<0.723
Radium-226/228	pCi/L	5	NC	NC	NC	<0.383	<0.470	0.691	<0.465	<0.736	0.673	<1.46	<1.67
Radium-228	pCi/L	5	NC	NC	NC	<0.383	<0.470	0.465	<0.465	<0.736	0.620	<0.736	0.966
Selenium	ug/L	50	50	50	5	<1	<1	<1	<1	<1	2	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criterion based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 2
 Summary of Analytical Results for Background Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15030							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	background							
Appendix III													
Boron	ug/L	NC	500	500	7,200	620	481	501	568	871	484	653	396
Calcium	mg/L	NC	NC	NC	500	22.9	6.67	24.7	21.7	17.3	20.7	19.0	20.6
Chloride	mg/L	250**	250	250	500	18.4	18.0	15.1	18.3	13.8	18.5	16.4	14.3
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	7.87	6.9	7.5	7.0	6.8	7.1	6.84	7.09
Sulfate	mg/L	250**	250	250	500	36.4	38.4	47.5	37.1	36.1	40.9	37.7	51.5
Total Dissolved Solids	mg/L	500**	500	500	500	140	160	140	140	120	130	106	390
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	18	27	12	36	31	12	14.5	12.5
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3.0	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	1	<1	<1	<1	2	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	8	<5	<5	<5	<5	6.7	7.0
Radium-226	pCi/L	5	NC	NC	NC	<0.171	<0.165	<0.159	<0.345	<0.208	<0.319	0.535	<0.742
Radium-226/228	pCi/L	5	NC	NC	NC	<0.472	0.801	<0.355	<0.673	<0.707	<0.593	1.63	<1.77
Radium-228	pCi/L	5	NC	NC	NC	<0.472	0.661	<0.355	<0.673	<0.707	<0.593	1.09	<1.03
Selenium	ug/L	50	50	50	5	<1	<1	2	<1	<1	<1	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criterion based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15017							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	386	343	444	321	592	618	407	347
Calcium	mg/L	NC	NC	NC	500	64.9	70.8	68.3	62.5	58.5	52.2	56.0	56.3
Chloride	mg/L	250**	250	250	500	66.9	32.3	35.2	56.4	45.1	22.8	70.8	112
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.77	6.6	6.3	6.3	6.1	5.8	6.14	6.11
Sulfate	mg/L	250**	250	250	500	51.0	43.4	49.2	46.1	54.2	75.0	70.3	84.2
Total Dissolved Solids	mg/L	500**	500	500	500	350	280	300	370	320	300	366	476
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	50	57	75	73	127	116	76.4	103
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	0.2	0.3	0.22	0.42
Chromium	ug/L	100	100	100	11	<1	<1	1	<1	<1	2	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	6	7	8	11	12	<5.0	10.6
Radium-226	pCi/L	5	NC	NC	NC	0.231	<0.182	0.333	<0.716	0.283	0.456	<0.388	<0.917
Radium-226/228	pCi/L	5	NC	NC	NC	<0.800	<0.659	1.75	1.81	2.01	2.07	1.64	2.30
Radium-228	pCi/L	5	NC	NC	NC	<0.800	<0.659	1.42	1.60	1.73	1.61	1.27	1.51
Selenium	ug/L	50	50	50	5	31	19	30	20	34	37	23.5	27.4
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

[^] - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15018							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	110	128	164	137	133	146	159	133
Calcium	mg/L	NC	NC	NC	500	81.3	93.5	78.3	85.0	83.2	65.3	74.5	62.7
Chloride	mg/L	250**	250	250	500	46.1	18.2	30.7	41.1	34.5	31.8	43.8	43.7
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.64	6.5	6.3	6.1	6.3	6.2	6.41	6.28
Sulfate	mg/L	250**	250	250	500	70.8	64.7	75.5	80.2	77.3	73.6	79.8	88.4
Total Dissolved Solids	mg/L	500**	500	500	500	360	330	340	400	340	330	336	390
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	67	63	69	93	95	83	69.1	89.7
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	<1	2	<1	<1	1	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	6.8
Radium-226	pCi/L	5	NC	NC	NC	<0.203	0.228	<0.285	<0.318	<0.257	<0.306	0.420	0.667
Radium-226/228	pCi/L	5	NC	NC	NC	1.05	1.26	1.03	1.33	<0.408	1.22	0.910	1.91
Radium-228	pCi/L	5	NC	NC	NC	0.951	1.03	1.03	1.33	<0.408	1.04	<0.556	1.24
Selenium	ug/L	50	50	50	5	13	7	11	14	12	18	15.6	13.9
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15019							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	224	197	237	197	256	194	166	180
Calcium	mg/L	NC	NC	NC	500	137	121	125	86.5	106	63.2	85.9	53.1
Chloride	mg/L	250**	250	250	500	68.0	44.2	56.0	34.5	28.9	1.25	48.6	27.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.9	6.6	6.6	6.2	6.6	6.3	6.81	6.38
Sulfate	mg/L	250**	250	250	500	99.1	56.5	85.1	41.9	50.9	12.7	53.8	42.6
Total Dissolved Solids	mg/L	500**	500	500	500	580	440	520	370	420	250	378	268
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	53	44	50	38	47	69	41.1	40.0
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	<1	2	1	1	3	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	8	<5	7	21	33	7.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.246	0.436	<0.184	<0.297	<0.253	<0.316	<0.601	<0.856
Radium-226/228	pCi/L	5	NC	NC	NC	0.959	1.52	1.72	1.05	<0.715	0.976	<1.12	<1.75
Radium-228	pCi/L	5	NC	NC	NC	0.839	1.08	1.58	0.874	<0.715	0.775	0.685	0.947
Selenium	ug/L	50	50	50	5	6	12	9	14	13	18	18.0	15.8
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15020							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	262	180	218	192	186	158	170	155
Calcium	mg/L	NC	NC	NC	500	75.1	59.7	57.7	58.3	62.3	45.9	50.0	49.1
Chloride	mg/L	250**	250	250	500	55.2	28.4	45.5	40.5	39.0	26.2	49.4	50.3
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.56	6.3	6.2	6	6.4	6.2	6.44	6.51
Sulfate	mg/L	250**	250	250	500	44.6	28.3	30.0	25.9	25.5	19.5	30.4	29.9
Total Dissolved Solids	mg/L	500**	500	500	500	340	230	280	280	290	220	306	272
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	57	27	40	40	31	32	41.9	38.7
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	1	2	<1	2	1	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.224	<0.181	<0.186	<0.334	<0.280	<0.289	<0.567	<0.444
Radium-226/228	pCi/L	5	NC	NC	NC	<0.568	0.943	1.83	1.70	0.624	<0.581	<1.27	2.28
Radium-228	pCi/L	5	NC	NC	NC	<0.568	0.886	1.83	1.64	0.606	<0.581	<0.700	1.92
Selenium	ug/L	50	50	50	5	7	4	<1	7	7	5	5.2	4.5
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15021							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	393	386	287	300	337	231	232	233
Calcium	mg/L	NC	NC	NC	500	61.1	74.2	42.7	50.2	56.9	30.1	32.8	35.7
Chloride	mg/L	250**	250	250	500	62.7	63.0	36.1	40.7	46.8	24.3	33.9	35.2
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.34	6.1	6	6.1	6.3	6	6.17	6.30
Sulfate	mg/L	250**	250	250	500	40.4	43.0	28.7	27.7	33.4	24.7	24.7	30.2
Total Dissolved Solids	mg/L	500**	500	500	500	340	340	250	260	300	190	204	238
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	71	70	56	46	54	55	63.3	47.6
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	<1	2	<1	<1	1	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.268	<0.200	<0.171	<0.324	<0.270	<0.221	0.354	0.238
Radium-226/228	pCi/L	5	NC	NC	NC	1.05	2.11	1.23	1.52	0.592	<0.536	<0.866	1.53
Radium-228	pCi/L	5	NC	NC	NC	0.879	2.03	1.18	1.52	0.571	<0.536	<0.729	1.29
Selenium	ug/L	50	50	50	5	3	1	2	3	2	3	2.0	3.3
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15022							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	433	393	329	371	413	444	397	376
Calcium	mg/L	NC	NC	NC	500	109	93.6	102	121	118	115	101	122
Chloride	mg/L	250**	250	250	500	11.2	8.68	1.28	3.94	4.67	2.07	1.1	1.6
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.99	6.9	6.8	6.8	6.8	7	6.96	6.95
Sulfate	mg/L	250**	250	250	500	75.3	47.6	24.4	42.1	81.5	26.9	19.2	35.0
Total Dissolved Solids	mg/L	500**	500	500	500	480	440	380	480	500	440	502	466
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	51	27	21	26	28	26	22.6	26.8
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	2	1	2	1	2	3	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	6	5	5	6	<5	5	<5.0	5.3
Radium-226	pCi/L	5	NC	NC	NC	<0.159	<0.186	1.12	<0.219	<0.224	<0.260	<0.426	<0.861
Radium-226/228	pCi/L	5	NC	NC	NC	2.29	<0.636	2.20	1.32	1.75	1.84	<0.937	<1.89
Radium-228	pCi/L	5	NC	NC	NC	2.22	<0.636	1.08	1.26	1.62	1.60	<0.511	<1.03
Selenium	ug/L	50	50	50	5	8	10	<1	6	9	4	1.3	4.1
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

[^] - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15031							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	89	117	106	111	102	112	96.5	97.0
Calcium	mg/L	NC	NC	NC	500	77.1	94.2	80.3	84.8	70.3	76.3	63.9	62.5
Chloride	mg/L	250**	250	250	500	38.6	45.6	40.0	42.1	37.8	38.3	41.7	48.1
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.96	6.7	6.7	6.8	6.8	6.9	6.85	6.83
Sulfate	mg/L	250**	250	250	500	36.6	45.8	41.1	40.1	29.8	34.1	35.2	40.9
Total Dissolved Solids	mg/L	500**	500	500	500	340	390	380	370	310	340	348	454
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	21	23	21	20	18	20	16.6	19.2
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	11	1	2	1	2	3	12.3	1.7
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.230	<0.272	<0.309	<0.379	<0.279	0.419	<1.03	<0.423
Radium-226/228	pCi/L	5	NC	NC	NC	1.06	<0.424	1.01	1.79	0.922	1.67	<1.67	<1.47
Radium-228	pCi/L	5	NC	NC	NC	0.922	<0.424	0.872	1.53	0.759	1.25	<0.636	<1.05
Selenium	ug/L	50	50	50	5	3	2	1	1	2	2	1.3	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15032							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	73	74	61	72	78	71	56.4	62.4
Calcium	mg/L	NC	NC	NC	500	11.6	10.2	9.91	11.6	8.85	8.87	7.2	7.0
Chloride	mg/L	250**	250	250	500	1.99	2.14	2.43	2.84	2.55	3.49	2.7	3.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.37	6.2	6	5.6	6.2	6.1	5.99	6.07
Sulfate	mg/L	250**	250	250	500	18.4	18.0	19.4	19.7	16.0	16.1	13.9	16.3
Total Dissolved Solids	mg/L	500**	500	500	500	64	64	79	67	57	66	54	<50.0
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	10	9	9	10	9	9	7.3	9.1
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	1	<1	1	1	1	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.197	<0.178	<0.234	<0.195	<0.245	<0.278	<0.457	<0.973
Radium-226/228	pCi/L	5	NC	NC	NC	<0.566	<0.466	<0.509	<0.498	<0.654	<0.441	<1.35	<1.90
Radium-228	pCi/L	5	NC	NC	NC	<0.566	<0.466	<0.509	<0.498	<0.654	<0.441	<0.893	<0.923
Selenium	ug/L	50	50	50	5	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

[^] - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15033							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	27	32	35	31	34	33	33.0	30.8
Calcium	mg/L	NC	NC	NC	500	16.2	13.1	13.4	13.1	11.5	15.4	12.6	9.6
Chloride	mg/L	250**	250	250	500	<1	1.03	1.98	1.56	1.25	1.82	1.7	1.1
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.97	6.7	6.5	6.1	6.7	6.8	6.83	6.82
Sulfate	mg/L	250**	250	250	500	10.4	8.83	10.3	8.86	9.02	10.1	9.0	9.7
Total Dissolved Solids	mg/L	500**	500	500	500	64	66	69	74	54	79	124	126
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	<5	5	6	5	6	6	5.2	4.6
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	<1	<1	1	1	1	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.148	<0.296	<0.332	<0.300	<0.215	<0.415	0.521	<0.617
Radium-226/228	pCi/L	5	NC	NC	NC	<0.522	<0.534	<0.511	0.622	<0.356	0.887	<1.30	<1.67
Radium-228	pCi/L	5	NC	NC	NC	<0.522	<0.534	<0.511	0.537	<0.356	0.887	<0.824	<1.05
Selenium	ug/L	50	50	50	5	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

[^] - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15034							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	54	69	48	66	70	67	68.1	62.1
Calcium	mg/L	NC	NC	NC	500	10.3	8.60	6.91	11.0	8.33	5.83	5.5	5.9
Chloride	mg/L	250**	250	250	500	2.48	1.91	4.31	1.56	1.88	1.43	1.5	2.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.23	6.2	5.8	5.7	6	6	6.05	6.07
Sulfate	mg/L	250**	250	250	500	23.9	18.5	13.2	16.6	16.9	15.1	12.6	16.5
Total Dissolved Solids	mg/L	500**	500	500	500	50	62	53	61	48	49	104	60
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	8	7	5	6	6	6	5.4	5.5
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	<1	<1	<1	<1	1	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.256	<0.193	<0.244	<0.267	<0.283	<0.307	<0.607	<0.763
Radium-226/228	pCi/L	5	NC	NC	NC	0.963	<0.418	1.03	0.858	0.603	0.998	1.49	<1.52
Radium-228	pCi/L	5	NC	NC	NC	0.880	<0.418	0.853	0.819	0.451	0.877	0.905	<0.760
Selenium	ug/L	50	50	50	5	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

[^] - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15035							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	146	130	81	86	103	123	121	116
Calcium	mg/L	NC	NC	NC	500	118	111	78.7	72.5	83.3	88.5	82.1	91.3
Chloride	mg/L	250**	250	250	500	34.2	31.3	16.7	19.0	25.4	21.2	28.3	33.9
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	6.97	6.9	7.2	7.3	7.1	7.2	7.16	7.04
Sulfate	mg/L	250**	250	250	500	39.2	32.4	20.8	21.8	24.9	24.7	28.2	35.4
Total Dissolved Solids	mg/L	500**	500	500	500	450	400	300	320	320	320	314	578
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	27	21	14	13	16	17	15.8	19.4
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	15	<1	1	<1	2	3	1.1	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.151	<0.156	0.355	<0.345	<0.239	<0.429	<0.452	<1.08
Radium-226/228	pCi/L	5	NC	NC	NC	0.929	<0.622	1.40	1.28	1.47	0.801	<1.35	<1.98
Radium-228	pCi/L	5	NC	NC	NC	0.902	<0.622	1.04	1.23	1.40	0.764	0.899	0.952
Selenium	ug/L	50	50	50	5	3	2	<1	<1	1	1	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15036							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	54	79	74	70	51	99	87.3	51.7
Calcium	mg/L	NC	NC	NC	500	46.2	53.9	70.9	61.7	36.1	82.9	69.4	39.6
Chloride	mg/L	250**	250	250	500	19.1	13.9	25.2	20.7	11.9	27.3	27.2	23.4
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	7.62	7.4	7	6.8	7.4	7.2	7.31	7.47
Sulfate	mg/L	250**	250	250	500	18.5	16.6	23.6	19.4	12.1	29.2	29.4	20.3
Total Dissolved Solids	mg/L	500**	500	500	500	180	230	300	290	160	340	404	246
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	8	8	10	10	6	13	10.9	7.2
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	1.1	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	1	1	<1	1	1	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.174	0.194	<0.229	<0.260	<0.202	<0.303	<0.692	<0.671
Radium-226/228	pCi/L	5	NC	NC	NC	2.20	<0.470	0.623	0.486	0.745	<0.874	<1.48	<1.88
Radium-228	pCi/L	5	NC	NC	NC	2.10	<0.470	0.513	0.367	0.700	<0.874	<0.783	<1.21
Selenium	ug/L	50	50	50	5	<1	<1	<1	<1	<1	2	<1.0	<1.0
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 3
 Summary of Analytical Results for Landfill Groundwater Samples
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location: Sample Date:						JHC-MW-15037							
Constituent	Unit	EPA MCL	MI Residential*	MI Non-Residential*	MI GSI^	downgradient							
Appendix III													
Boron	ug/L	NC	500	500	7,200	107	122	164	153	210	273	263	171
Calcium	mg/L	NC	NC	NC	500	71.9	64.6	73.4	78.8	89.7	91.2	94.6	83.8
Chloride	mg/L	250**	250	250	500	23.6	32.8	38.6	29.6	30.4	15.3	14.7	25.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
pH, Field	SU	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5	6.5 - 9.0	7.26	7.1	7	6.8	7.3	7	7.22	7.21
Sulfate	mg/L	250**	250	250	500	38.3	27.9	27.2	35.1	54.6	35.1	41.3	52.3
Total Dissolved Solids	mg/L	500**	500	500	500	290	260	380	360	400	380	404	408
Appendix IV													
Antimony	ug/L	6	6	6	130	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Arsenic	ug/L	10	10	10	10	<1	<1	<1	<1	<1	<10	<1.0	<1.0
Barium	ug/L	2,000	2,000	2,000	670	13	14	17	16	16	15	15.1	13.4
Beryllium	ug/L	4	4	4	6.7	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Cadmium	ug/L	5	5	5	3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Chromium	ug/L	100	100	100	11	<1	<1	3	<1	1	2	<1.0	<1.0
Cobalt	ug/L	NC	40	100	100	<15	<15	<15	<15	<15	<15	<15.0	<15.0
Fluoride	ug/L	4,000	NC	NC	NC	<1000	<1000	<1000	<1000	<1000	<1000	<1000	<1000
Lead	ug/L	NC	4	4	29	<1	<1	<1	<1	<1	<1	<1.0	<1.0
Lithium	ug/L	NC	170	350	440	<10	<10	<10	<10	<10	<10	<10	<10
Mercury	ug/L	2	2	2	0.20#	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20
Molybdenum	ug/L	NC	73	210	3,200	<5	<5	<5	<5	<5	<5	<5.0	<5.0
Radium-226	pCi/L	5	NC	NC	NC	<0.185	<0.212	<0.280	<0.271	<0.217	<0.363	<0.733	<0.685
Radium-226/228	pCi/L	5	NC	NC	NC	0.868	<0.750	0.973	1.14	0.667	2.27	<1.40	<1.91
Radium-228	pCi/L	5	NC	NC	NC	0.801	<0.750	0.814	1.05	0.512	2.17	0.941	<1.22
Selenium	ug/L	50	50	50	5	25	6	<1	13	25	11	11.9	14.1
Thallium	ug/L	2	2	2	3.7	<2	<2	<2	<2	<2	<2	<2.0	<2.0

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

pCi/L - picocuries per liter.

MCL - Maximum Contaminant Level, EPA Drinking Water Standards and Health Advisories, April, 2012.

NC - no criteria.

* - Michigan Part 201 Generic Drinking Water Cleanup Criteria, December 30, 2013.

** - Secondary Maximum Contaminant Level (SMCL), EPA Secondary Drinking Water Regulations (SDWR) April, 2012.

^ - Michigan Part 201 Groundwater Surface Water Interface (GSI) Criteria. Hardness-dependent criteria calculated using default hardness of 150 mg CaCO₃/L per MDEQ RRD Op Memo 5, Sept. 30, 2004. Generic GSI criterion for calcium, chloride, and sulfate is the total dissolved solids criterion. Chromium GSI criteria based on hexavalent chromium per footnote {H}.

- If detected above 0.20 ug/L, further evaluation of low-level mercury may be necessary to evaluate the GSI pathway per Michigan Part 201 and MDEQ policy and procedure 09-014 dated June 20, 2012.

BOLD value indicates an exceedance of one or more of the listed criteria.

RED value indicates an exceedance of the MCL.

All metals were analyzed as total unless otherwise specified.

Table 4
 Summary of Field Parameters
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location	Sample Date	Dissolved Oxygen	Oxidation Reduction Potential	pH	Specific Conductivity	Temperature	Turbidity
		mg/L	mV	SU	umhos/cm	°C	NTU
Background							
JHC-MW-15023	12/04/15	0.9	104.6	6.26	112	10.65	1.1
	03/10/16	1.0	155.5	5.8	139	10.4	<1
	06/23/16	5.4	120.8	5.5	86	13.7	<1
	08/31/16	3.9	131.2	5.6	70	14.0	<1
	11/16/16	1.4	129.5	5.8	99	12.4	1.5
	04/20/17	2.1	239.7	5.5	76	11.4	<1
	06/21/17	3.43	212.9	5.79	39	11.13	2.29
	08/15/17	1.52	86.1	5.76	59.5	12.15	3.66
JHC-MW-15024	12/04/15	0.56	114	7.35	285	10.14	1.57
	03/10/16	1.7	121.6	7.3	375	8.2	<1
	06/23/16	1.5	50.0	7.3	351	13.4	<1
	09/01/16	1.6	153.2	7.4	374	13.0	<1
	11/16/16	2.1	80.8	7.1	304	12.3	1.4
	04/20/17	1.0	147.2	7.5	344	8.9	<1
	06/21/17	0.81	152.3	7.67	248	11.46	<1
	08/15/17	0.63	99.0	7.36	371.7	12.56	1.16
JHC-MW-15025	12/04/15	1.35	-60.5	8.08	369	10.42	1.85
	03/10/16	5.3	121.6	8.0	286	7.7	4.3
	06/23/16	6.4	69.2	7.4	200	11.6	<1
	09/01/16	4.9	153.3	7.4	279	13.0	<1
	11/16/16	5.3	68.9	7.5	286	11.9	<1
	04/20/17	6.4	149.8	7.5	238	9.0	<1
	06/21/17	6.24	157.3	7.43	157	12.45	1.98
	08/14/17	4.64	117.6	7.29	188.1	13.83	1.23
JHC-MW-15026	12/07/15	5.86	96.1	6.44	52	8.97	5.13
	03/10/16	5.0	178.5	6.2	55	8.10	1
	06/24/16	3.3	166.0	5.7	66	10.3	<1
	09/01/16	4.0	147.5	6.6	90	11.6	<1
	11/16/16	8.2	131.2	6.2	52	11.3	<1
	04/20/17	5.7	214.9	5.9	52	11.7	<1
	06/21/17	5.11	189.0	6.15	30	11.78	1.85
	08/14/17	5.49	107.2	6.76	86.8	13.26	1.84
JHC-MW-15027	12/07/15	1.91	107.4	6.75	160	8.94	2.11
	03/11/16	7.2	202.2	6.9	101	7.3	1.6
	06/24/16	5.2	69.5	6.7	164	11.1	<1
	09/01/16	627	101.9	6.2	120	12.3	2.6
	11/17/16	4.5	107.7	6.8	114	11.6	<1
	04/21/17	7.9	177.1	6.5	83	7.7	3
	06/21/17	6.62	153.2	6.46	36	11.0	4.03
	08/14/17	4.60	68.4	6.77	72.3	12.19	3.85

Notes:

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Table 4
 Summary of Field Parameters
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location	Sample Date	Dissolved Oxygen	Oxidation Reduction Potential	pH	Specific Conductivity	Temperature	Turbidity
		mg/L	mV	SU	umhos/cm	°C	NTU
Background							
JHC-MW-15028	12/07/15	6.73	85.5	8.24	85	10.13	1.66
	03/11/16	7.2	145.2	8.7	102	8.7	<1
	06/24/16	8.5	43.6	7.9	84	14.0	<1
	09/01/16	7.9	63.9	7.5	95	14.3	<1
	11/17/16	8.6	46.6	8.4	84	14.0	<1
	04/21/17	9.3	157.3	8.1	75	9.3	<1
	06/21/17	6.02	103.8	8.79	68	12.47	4.33
	08/14/17	6.35	22.2	8.83	88.5	15.68	3.56
JHC-MW-15029	12/08/15	0.14	-109.4	8.5	258	13.39	5.14
	03/11/16	0.3	157.6	8.6	261	9.3	2.4
	06/24/16	0.4	63.3	8.3	255	12.5	1.2
	09/01/16	0.6	-8.0	8.0	266	16.7	<1
	11/17/16	0.8	121.5	8.3	256	15.8	1.5
	04/20/17	1.2	157.4	7.1	552	12.4	1.0
	06/21/17	0.44	72.0	8.34	191	14.64	3.89
	08/14/17	0.13	49.2	8.46	218.1	17.98	1.70
JHC-MW-15030	12/08/15	0.4	-96.1	7.87	228	12.19	2.31
	03/11/16	1.0	22.6	6.9	251	8.1	3.6
	06/24/16	0.5	-38.1	7.5	222	12.8	4.7
	09/01/16	0.7	-22.9	7.0	212	16.6	2.3
	11/17/16	1.2	64.7	6.8	193	14.5	1
	04/20/17	0.2	57.8	7.1	220	10.6	<1
	06/21/17	0.40	41.4	6.84	139	12.07	2.86
	08/14/17	0.15	61.6	7.09	213.5	15.23	2.81
Landfill							
JHC-MW-15017	12/03/15	2.52	125.3	6.77	595	11.39	1.65
	03/09/16	4.5	187.1	6.6	510	10.8	<1
	06/22/16	5.0	112.5	6.3	480	12.4	<1
	08/30/16	3.7	82.2	6.3	560	15	<1
	11/15/16	6.1	128.9	6.1	461	13.3	<1
	04/18/17	6.8	279.3	5.8	440	12.7	<1
	06/22/17	4.03	159.9	6.14	485	13.29	3.05
	08/16/17	3.26	169.6	6.11	566	15.02	1.62
JHC-MW-15018	12/03/15	1.88	76.3	6.64	543	11.03	3.09
	03/08/16	3.2	166.3	6.5	542	11.2	<1
	06/22/16	2.1	103.1	6.3	535	13.4	<1
	08/30/16	1.8	96.9	6.1	587	15.9	<1
	11/15/16	2.7	110.0	6.3	541	13.6	<1
	04/18/17	3.3	266.4	6.2	522	12.9	<1
	06/22/17	2.26	153.1	6.41	476	12.72	2.00
	08/16/17	1.63	147.1	6.28	450	15.02	2.27

Notes:

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Table 4
 Summary of Field Parameters
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location	Sample Date	Dissolved Oxygen	Oxidation Reduction Potential	pH	Specific Conductivity	Temperature	Turbidity
		mg/L	mV	SU	umhos/cm	°C	NTU
Landfill							
JHC-MW-15019	12/03/15	1.58	57.7	6.9	878	11.05	<1
	03/08/16	2.6	155.6	6.6	749	10.8	1
	06/22/16	2.0	89.0	6.6	829	13.2	<1
	08/30/16	2.7	101.5	6.2	536	16.4	<1
	11/15/16	4.0	99.2	6.6	652	13.1	<1
	04/19/17	7.0	284.9	6.3	433	9.8	<1
	06/22/17	1.99	142.6	6.81	531	13.80	1.56
	08/16/17	2.75	115.5	6.38	417.8	16.22	<1
JHC-MW-15020	12/03/15	1.75	23.2	6.56	567	10.82	2.8
	03/08/16	1.8	152.6	6.3	426	10.1	<1
	06/22/16	0.8	86.7	6.2	464	13.2	1.2
	08/30/16	1.6	73.4	6.0	439	17.0	1.6
	11/15/16	1.8	80.5	6.4	456	13.6	1.3
	04/19/17	3.9	286.9	6.2	370	9.9	<1
	06/22/17	0.84	170.3	6.44	407	13.93	3.70
	08/16/17	0.31	110.3	6.51	444.4	15.41	14.70
JHC-MW-15021	12/03/15	1.47	37.9	6.34	534	10.7	1.9
	03/08/16	0.5	119.1	6.1	625	10.7	<1
	06/22/16	2.9	98.5	6.0	373	14.3	1.5
	08/30/16	1.6	76.8	6.1	425	16.6	<1
	11/15/16	1.5	96.1	6.3	481	13.1	<1
	04/19/17	5.3	275.1	6.0	280	10.7	<1
	06/22/17	3.80	191.3	6.17	285	13.83	2.28
	08/16/17	2.10	107.7	6.30	358.6	15.28	1.60
JHC-MW-15022	12/05/15	3.64	-2.0	6.99	754	10.6	3.52
	03/09/16	7.6	145.8	6.9	689	11.1	<1
	06/23/16	7.3	259.6	6.8	616	10.9	<1
	08/31/16	5.4	75.8	6.8	676	12.2	<1
	11/17/16	5.5	125.8	6.8	664	11.3	<1
	04/19/17	7.0	64.6	7.0	640	9.9	<1
	06/22/17	7.12	170.5	6.96	540	12.23	2.28
	08/15/17	3.71	125.8	6.95	767.1	13.93	2.88
JHC-MW-15031	12/04/15	2.46	5.1	6.96	627	12.49	1.67
	03/09/16	5.0	146.2	6.7	680	12.5	<1
	06/23/16	2.3	247.5	6.7	619	12.8	<1
	08/31/16	2.1	72.0	6.8	599	14.1	<1
	11/16/16	2.0	76.2	6.8	509	12.6	<1
	04/19/17	2.2	38.2	6.9	542	13.7	<1
	06/22/17	2.36	140.1	6.85	486	14.90	2.93
	08/16/17	1.59	108.2	6.83	607.8	14.83	1.45

Notes:

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Table 4
 Summary of Field Parameters
 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

Sample Location	Sample Date	Dissolved Oxygen	Oxidation Reduction Potential	pH	Specific Conductivity	Temperature	Turbidity
		mg/L	mV	SU	umhos/cm	°C	NTU
Landfill							
JHC-MW-15032	12/04/15	3.5	113.5	6.37	83	9.74	5.01
	03/09/16	5.7	150.9	6.2	87	9.3	<1
	06/23/16	6.6	82.9	6.0	88	14.2	<1
	08/31/16	6.8	143.9	5.6	89	13.0	<1
	11/16/16	6.7	123.7	6.2	83	11.5	2.8
	04/19/17	6.2	168.3	6.1	93	9.0	<1
	06/23/17	5.90	127.6	5.99	56	11.18	2.43
	08/15/17	5.17	111.2	6.07	72.2	12.19	1.42
JHC-MW-15033	12/04/15	3.57	112.8	6.97	96	10.02	4.25
	03/09/16	4.5	134.8	6.7	98	10.9	4.8
	06/23/16	4.9	70.7	6.5	97	12.1	<1
	08/31/16	3.5	116.7	6.1	102	12.3	<1
	11/16/16	4.8	94.5	6.7	93	11.7	<1
	04/20/17	2.7	200.6	6.8	112	10.1	<1
	06/23/17	3.31	173.8	6.83	78	11.09	3.92
	08/15/17	3.49	108.2	6.82	89.0	12.01	1.10
JHC-MW-15034	12/04/15	4.33	120.5	6.23	82	10.33	2.51
	03/09/16	6.1	172.9	6.2	82	9.6	<1
	06/23/16	6.4	133.0	5.8	61	11.6	<1
	08/31/16	6.4	141.5	5.7	71	14.6	<1
	11/16/16	7.8	130.7	6.0	71	12.6	<1
	04/20/17	6.8	215.5	6.0	62	9.2	<1
	06/23/17	5.9	173.1	6.05	48	12.16	1.38
	08/15/17	4.63	105.4	6.07	65.6	13.54	1.29
JHC-MW-15035	12/04/15	0.96	-9.9	6.97	795	11.74	1.69
	03/09/16	1.4	114.8	6.9	693	12.7	<1
	06/23/16	1.1	239.7	7.2	508	12.7	<1
	08/31/16	0.6	53.1	7.3	466	14.4	<1
	11/16/16	0.8	55.8	7.1	501	12.8	<1
	04/19/17	0.8	-1.6	7.2	526	14.3	<1
	06/23/17	0.60	138.9	7.16	501	15.10	1.27
	08/16/17	0.49	106.4	7.04	698.4	15.37	<1
JHC-MW-15036	12/05/15	1.33	-49.5	7.62	387	12.09	<1
	03/10/16	2.3	134.3	7.4	397	11.1	<1
	06/23/16	2.0	52.7	7.0	504	15.8	<1
	08/31/16	1.4	67.7	6.8	441	15.8	<1
	11/16/16	1.3	66.5	7.4	287	12.4	<1
	04/19/17	2.4	108.2	7.2	601	12.2	<1
	06/23/17	2.00	153.7	7.31	445	14.07	1.42
	08/15/17	0.76	126.7	7.47	348.5	15.55	1.13

Notes:

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 JH Campbell – RCRA CCR Monitoring Program
 West Olive, Michigan

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		mg/L	mV	SU	umhos/cm	°C	NTU
Landfill							
JHC-MW-15037	12/04/15	1.97	127.8	7.26	483	10.76	<1
	03/10/16	2.4	137.6	7.1	517	9.9	<1
	06/23/16	4.4	66.0	7.0	611	14.5	<1
	08/31/16	3.8	76.3	6.8	532	13.1	<1
	11/16/16	4.7	77.6	7.3	658	10.8	<1
	04/19/17	3.1	132.3	7.0	659	11.6	<1
	06/23/17	3.68	156.7	7.22	563	13.72	4.72
	08/15/17	2.52	135.7	7.21	607.8	14.52	1.55

Notes:

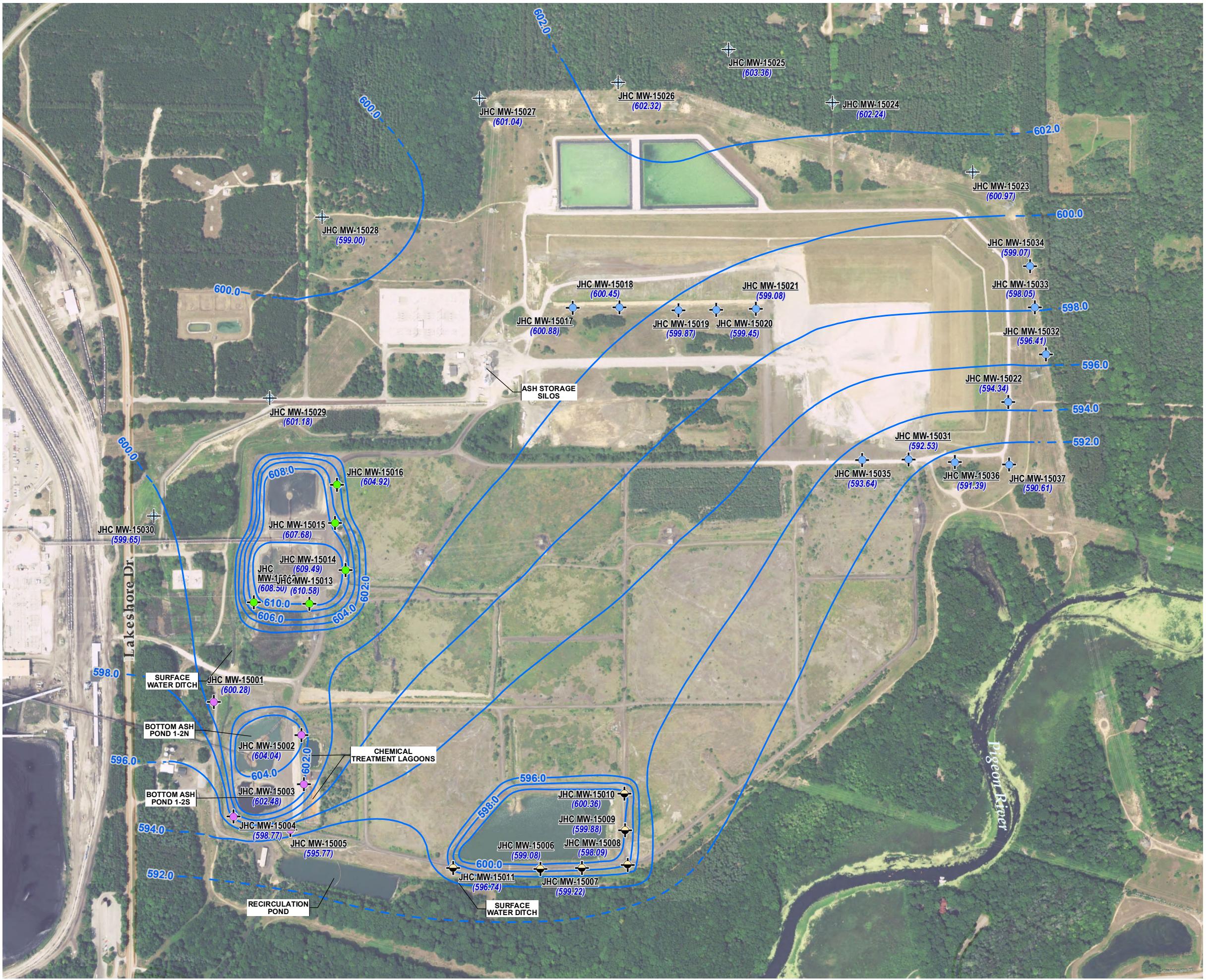
mg/L - Milligrams per Liter.

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**LEGEND**

- BACKGROUND MONITORING WELL
- DOWNGRADIENT BOTTOM ASH POND 1/2 N/S MONITORING WELL
- DOWNGRADIENT BOTTOM ASH POND 3 N/S MONITORING WELL
- DOWNGRADIENT LANDFILL MONITORING WELL
- POND A MONITORING WELL
- GROUNDWATER ELEVATION CONTOUR (2' INTERVAL, DASHED WHERE INFERRED)
- (600.97) GROUNDWATER ELEVATION (FEET, MSL)

NOTES

1. BASE MAP IMAGERY FROM USDA – NATIONAL AGRICULTURE IMAGERY PROGRAM, 7/20/2016.
2. WELL LOCATIONS SURVEYED BY NEDERVELD ON 11/25/2015.

PROJECT: CONSUMERS ENERGY COMPANY
JH CAMPBELL POWER PLANT
WEST OLIVE, MICHIGAN

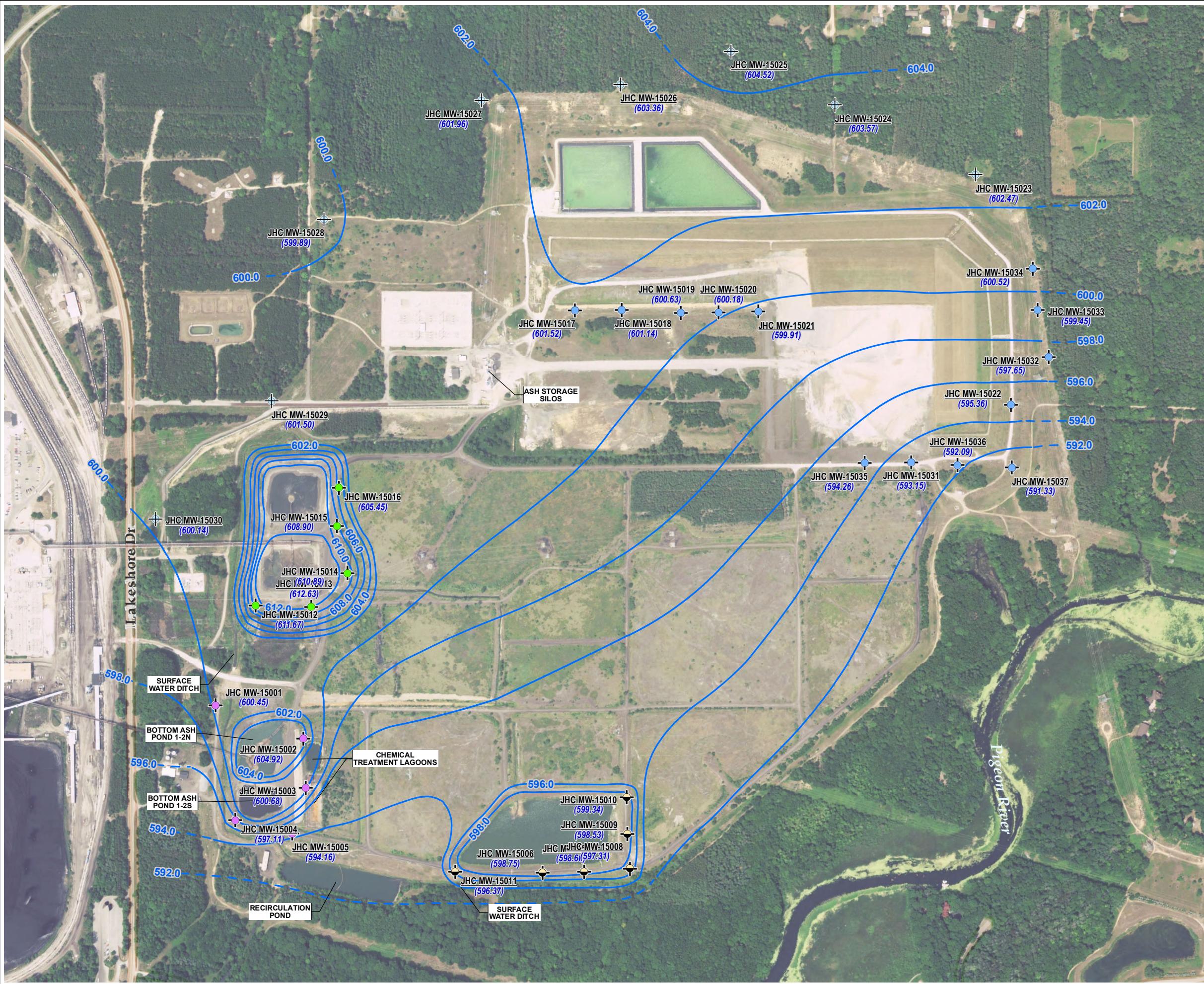
TITLE: GROUNDWATER CONTOUR MAP
DECEMBER 2, 2015

DRAWN BY:	J. PAPEZ	PROJ NO.:	269767-001
CHECKED BY:	S. HOLMSTROM		
APPROVED BY:	G. CROCKFORD		
DATE:	OCTOBER 2017		

1540 Eisenhower Place
Ann Arbor, MI 48108-3284
Phone: 734.971.7080
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FILE NO.: 269767-005-002.mxd

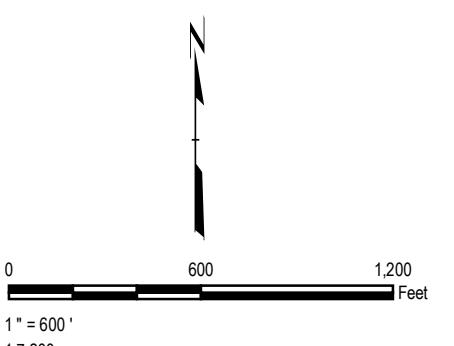
FIGURE 1

**LEGEND**

- BACKGROUND MONITORING WELL
- DOWNGRADIENT BOTTOM ASH POND 1/2 N/S MONITORING WELL
- DOWNGRADIENT BOTTOM ASH POND 3 N/S MONITORING WELL
- DOWNGRADIENT LANDFILL MONITORING WELL
- POND A MONITORING WELL
- GROUNDWATER ELEVATION CONTOUR (2' INTERVAL, DASHED WHERE INFERRED)
- (600.97) GROUNDWATER ELEVATION (FEET, MSL)

NOTES

- BASE MAP IMAGERY FROM USDA – NATIONAL AGRICULTURE IMAGERY PROGRAM, 7/20/2016.
- WELL LOCATIONS SURVEYED BY NEDERVELD ON 11/25/2015.



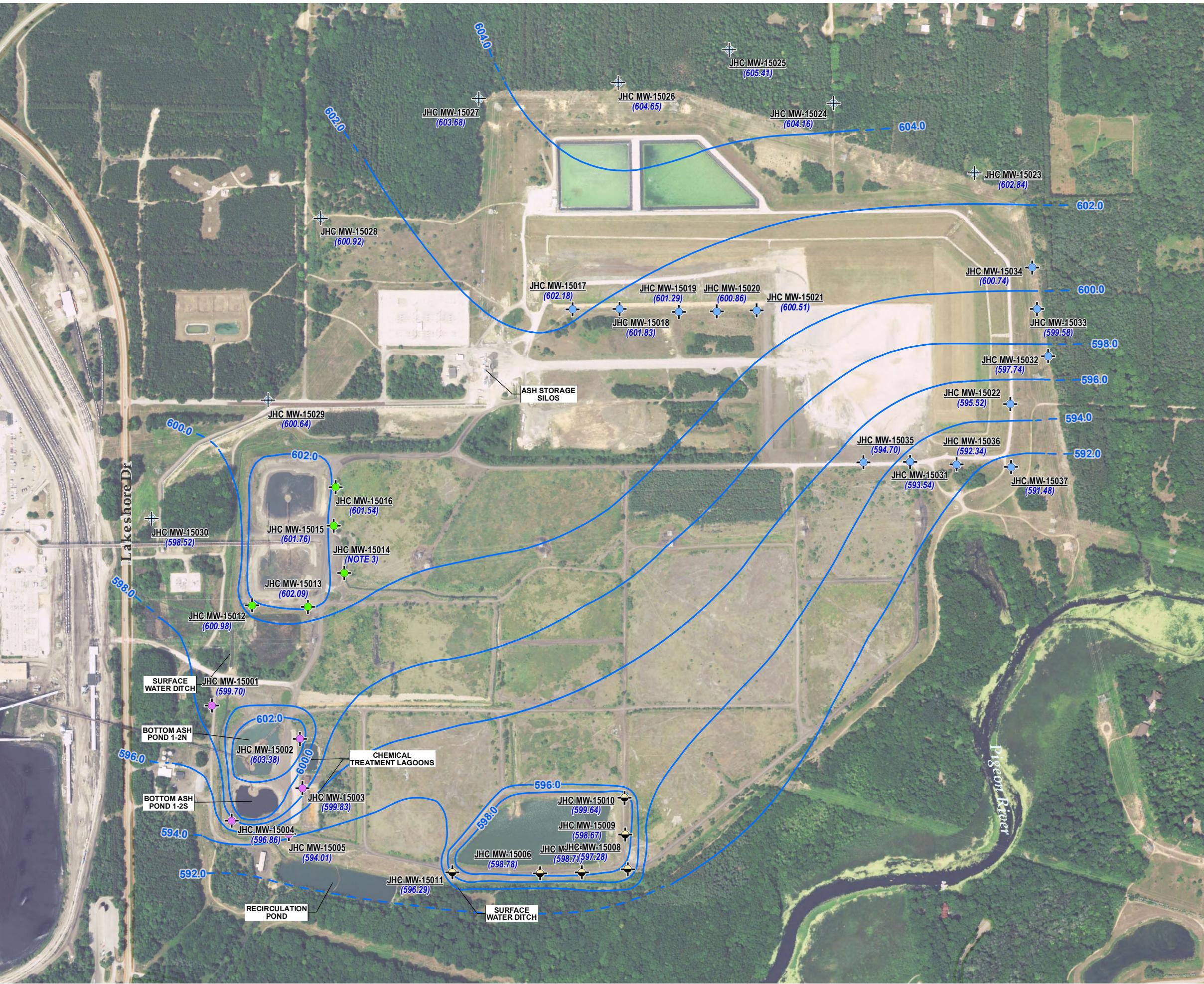
PROJECT: CONSUMERS ENERGY COMPANY
JH CAMPBELL POWER PLANT
WEST OLIVE, MICHIGAN

TITLE: GROUNDWATER CONTOUR MAP
MARCH 7, 2016

DRAWN BY:	J. PAPEZ	PROJ NO.:	269767-001
CHECKED BY:	S. HOLMSTROM		
APPROVED BY:	G. CROCKFORD		
DATE:	OCTOBER 2017		

FIGURE 2

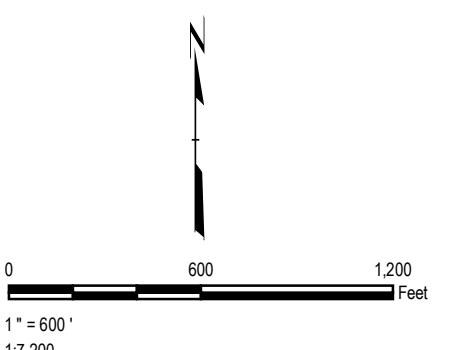
1540 Eisenhower Place
Ann Arbor, MI 48108-3284
Phone: 734.971.7080
www.trcsolutions.com

**LEGEND**

- BACKGROUND MONITORING WELL
- DNGRADIENT BOTTOM ASH POND 1/2 N/S MONITORING WELL
- DNGRADIENT BOTTOM ASH POND 3 N/S MONITORING WELL
- DNGRADIENT LANDFILL MONITORING WELL
- POND A MONITORING WELL
- GROUNDWATER ELEVATION CONTOUR (2' INTERVAL, DASHED WHERE INFERRED)
- (600.97) GROUNDWATER ELEVATION (FEET, MSL)

NOTES

- BASE MAP IMAGERY FROM USDA – NATIONAL AGRICULTURE IMAGERY PROGRAM, 7/20/2016.
- WELL LOCATIONS SURVEYED BY NEDERVELD ON 11/25/2015.
- MONITORING WELL DAMAGED, DATA NOT USED.



PROJECT:
**CONSUMERS ENERGY COMPANY
JH CAMPBELL POWER PLANT
WEST OLIVE, MICHIGAN**

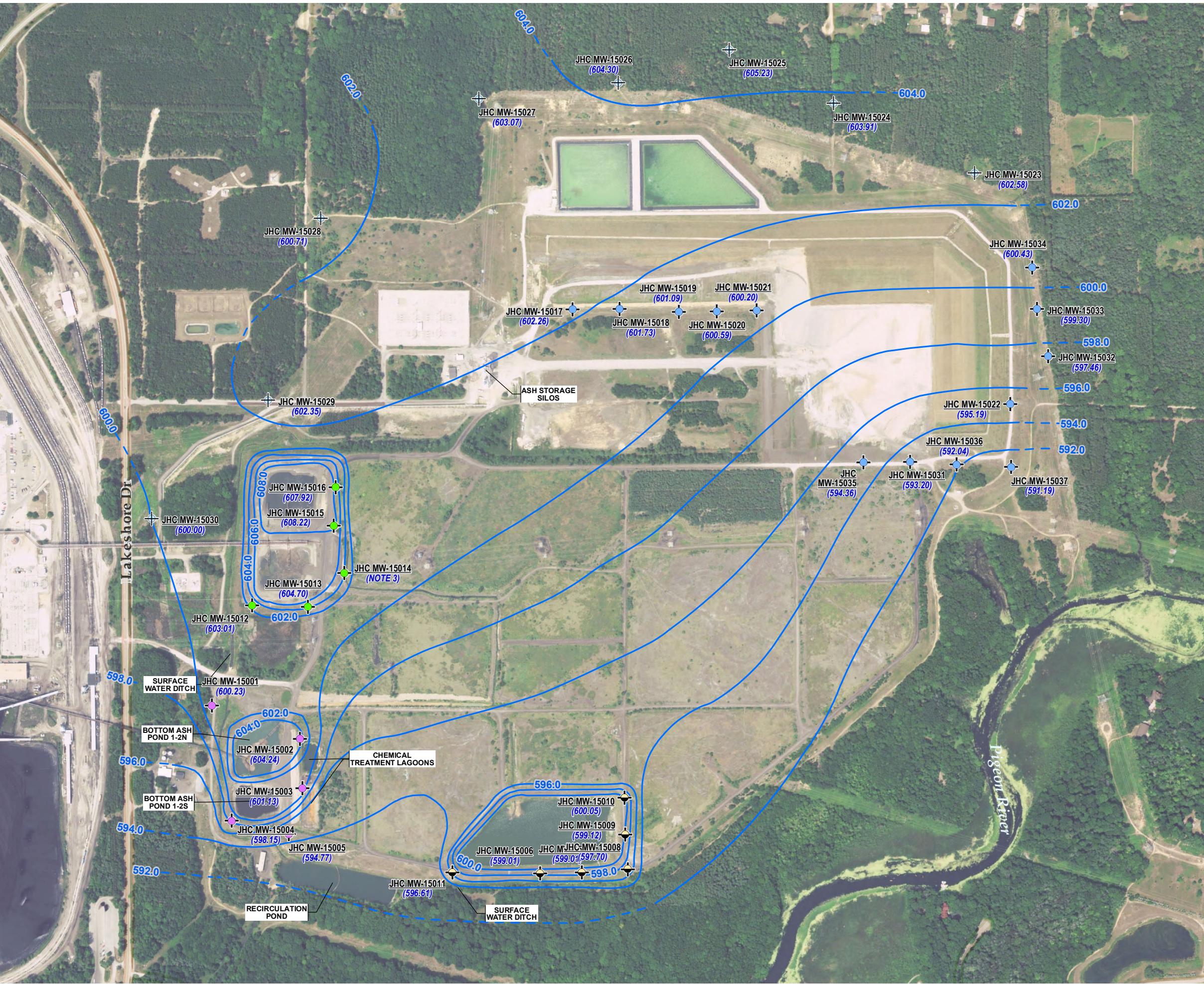
TITLE:
**GROUNDWATER CONTOUR MAP
JUNE 21, 2016**

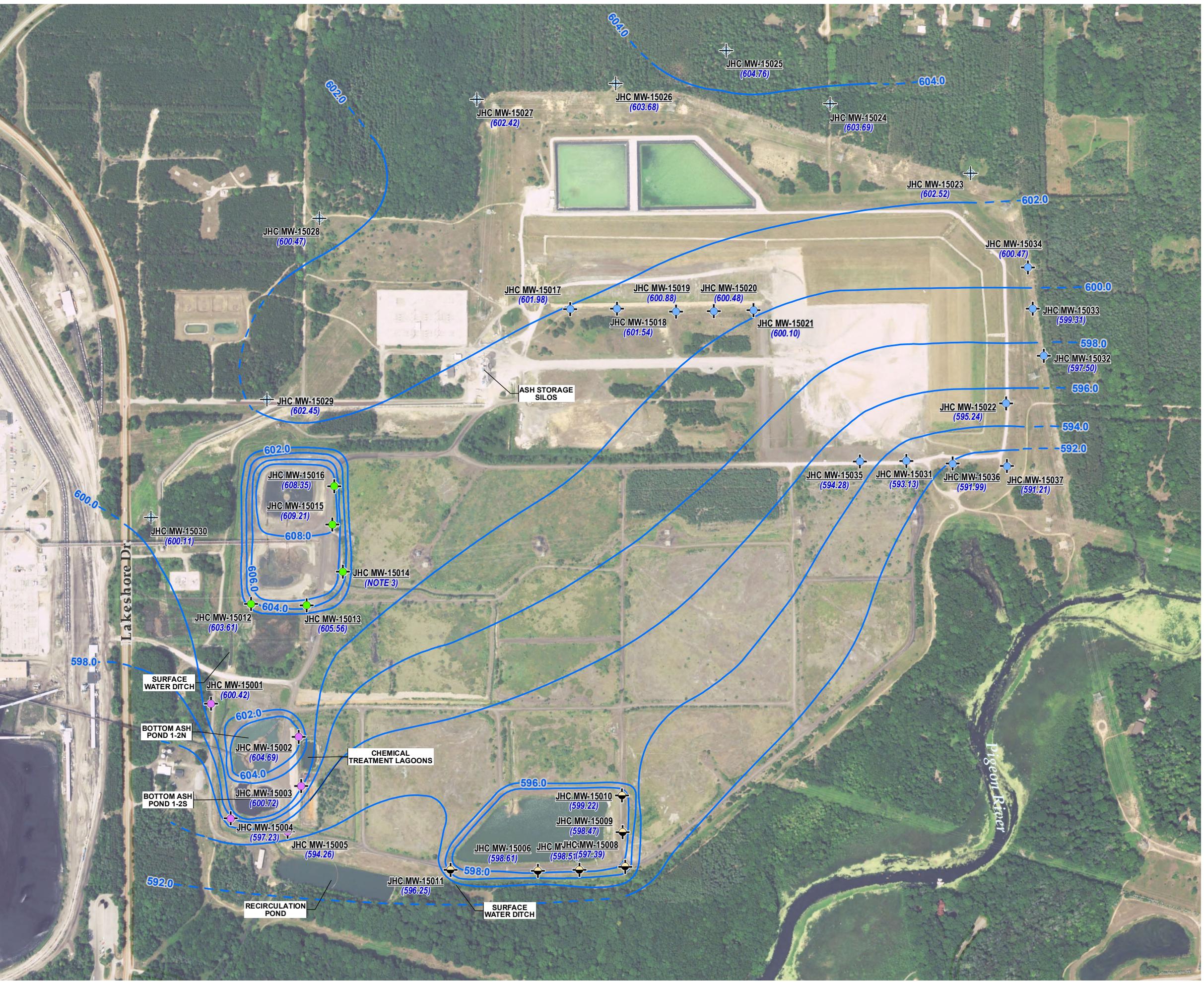
DRAWN BY:	J. PAPEZ	PROJ NO.:	269767-001
CHECKED BY:	S. HOLMSTROM		
APPROVED BY:	G. CROCKFORD		
DATE:	OCTOBER 2017		

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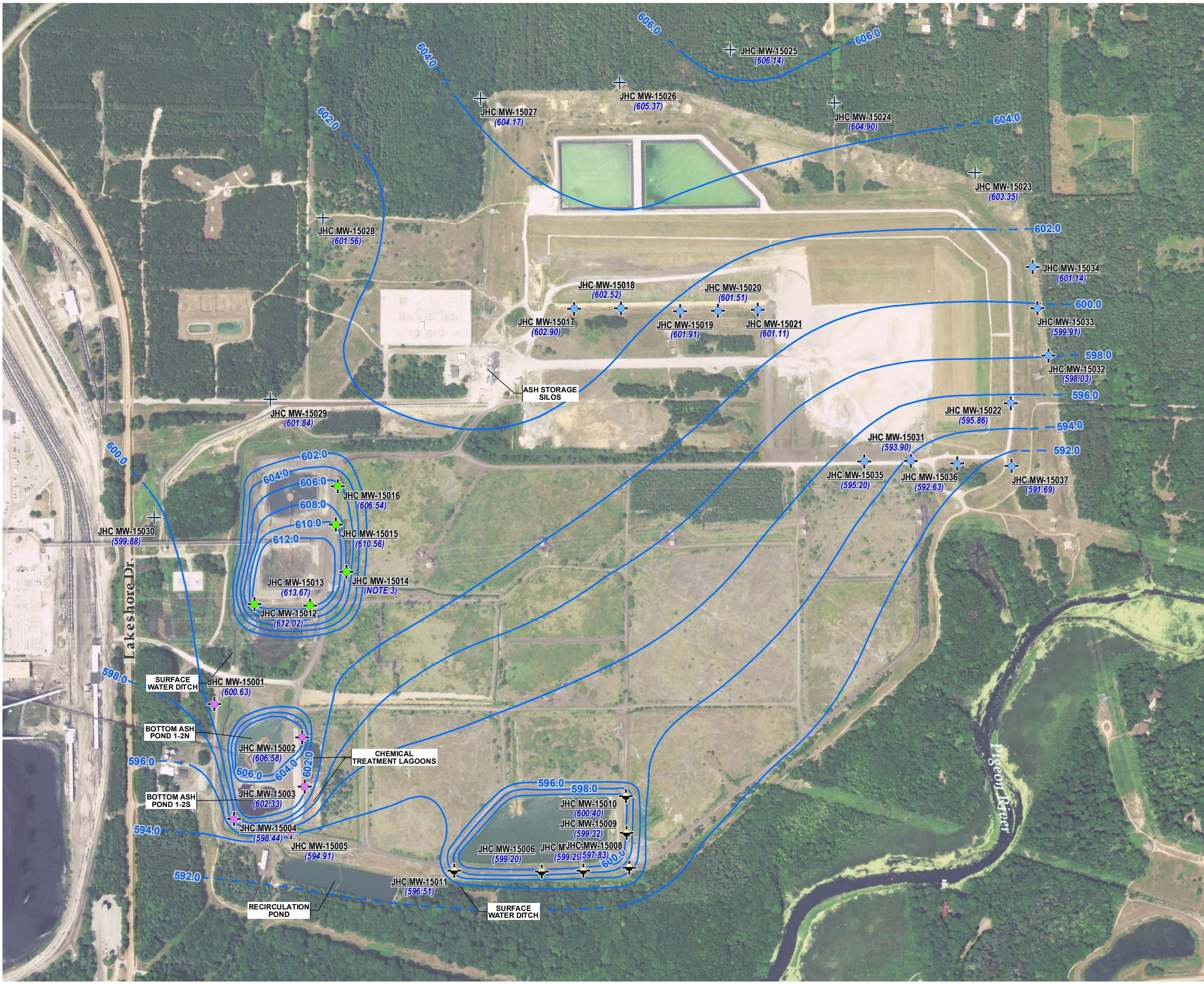
FILE NO.: 269767-005-004.mxd

FIGURE 3







**LEGEND**

- ⊕ BACKGROUND MONITORING WELL
- DOWNGRADIENT BOTTOM ASH POND 1/2 N/S MONITORING WELL
- DOWNGRADIENT BOTTOM ASH POND 3 N/S MONITORING WELL
- DOWNGRADIENT LANDFILL MONITORING WELL
- POND A MONITORING WELL
- ~~~~ GROUNDWATER ELEVATION CONTOUR (2' INTERVAL, DASHED WHERE INFERRED)
- (600.97) GROUNDWATER ELEVATION (FEET, MSL)

NOTES

1. BASE MAP IMAGERY FROM USDA – NATIONAL AGRICULTURE IMAGERY PROGRAM, 7/20/2016.
2. WELL LOCATIONS SURVEYED BY NEDERVELD ON 11/25/2015.
3. MONITORING WELL DAMAGED, DATA NOT USED.



0 600 1,200 Feet

1" = 600'
1:2,000

PROJECT:

CONSUMERS ENERGY COMPANY
JH CAMPBELL POWER PLANT
WEST OLIVE, MICHIGAN

TITLE:

GROUNDWATER CONTOUR MAP
JUNE 19, 2017

DRAWN BY:

J. PAPEZ

CHECKED BY:

S. HOLMSTROM

APPROVED BY:

G. CROCKFORD

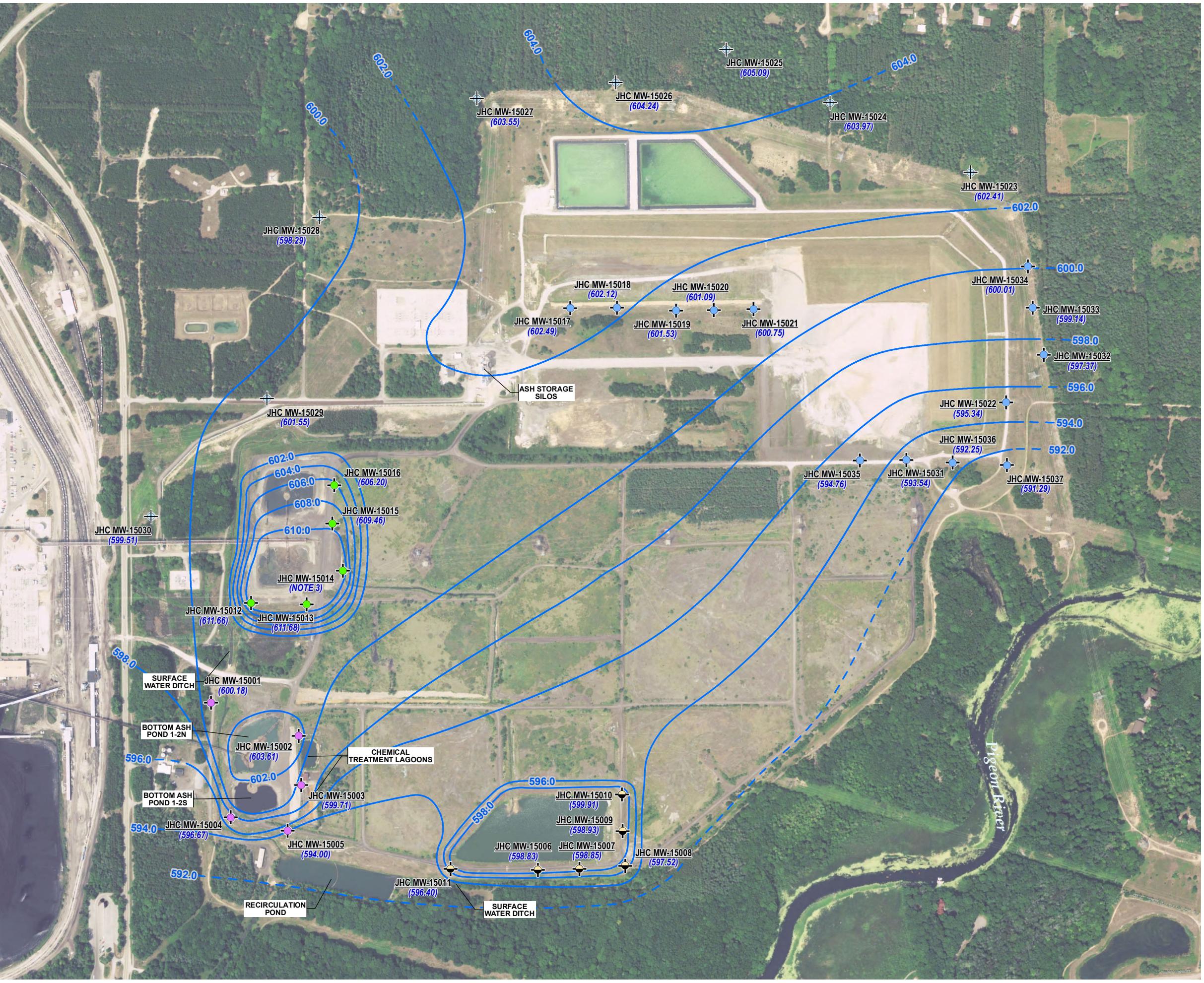
DATE:

OCTOBER 2017

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FILE NO.: 269767-005-008.mxd

FIGURE 7



Appendix B

Data Quality Review

Laboratory Data Quality Review

Groundwater Monitoring Event September 2017

CEC JH Campbell Background

Groundwater samples were collected by TRC for the September 2017 sampling event. Samples were analyzed for anions, total metals, and total dissolved solids by Pace Analytical Services, LLC (Pace), located in Grand Rapids, Michigan. The laboratory analytical results are reported in laboratory report 462815.

During the September 2017 sampling event, a groundwater sample was collected from each of the following wells:

- JHC-MW-15023
- JHC-MW-15024
- JHC-MW-15025
- JHC-MW-15026
- JHC-MW-15027
- JHC-MW-15028
- JHC-MW-15029
- JHC-MW-15030

Each sample was analyzed for the following constituents:

Analyte Group	Method
Anions (Chloride, Fluoride, Sulfate)	EPA 300.0
Total Metals	EPA 6020A, EPA 6010C
Total Dissolved Solids	SM 2540C

TRC reviewed the laboratory data to assess data usability. The following sections summarize the data review procedure and the results of the review.

Data Usability Review Procedure

The analytical data were reviewed using the USEPA National Functional Guidelines for Inorganic Superfund Methods Data Review (USEPA, 2017). The following items were included in the evaluation of the data:

- Sample receipt, as noted in the cover page or case narrative;
- Technical holding times for analyses;
- Data for method blanks. Method blanks are used to assess potential contamination arising from laboratory sample preparation and/or analytical procedures;
- Percent recoveries for matrix spike (MS) and matrix spike duplicates (MSD). Percent recoveries are calculated for each analyte spiked and used to assess bias due to sample matrix effects;
- Reporting limits (RLs) compared to project-required RLs;

- Data for laboratory control samples (LCSs). The LCSs are used to assess the accuracy of the analytical method using a clean matrix;
- Data for laboratory duplicates, when available. The laboratory duplicates are replicate analyses of one sample and are used to assess the precision of the analytical method; and
- Overall usability of the data.

This data usability report addresses the following items:

- Usability of the data if quality control (QC) results suggest potential problems with all or some of the data;
- Actions regarding specific QC criteria exceedances.

Review Summary

The data quality objectives and laboratory completeness goals for the project were met, and the data are usable for their intended purpose. A summary of the data quality review, including non-conformances and issues identified in this evaluation, are noted below.

- Appendix III constituents will be utilized for the purposes of a detection monitoring program.
- Data are usable for the purposes of the detection monitoring program.
- When the data are evaluated through a detection monitoring statistical program, findings below may be used to support the removal of outliers.

QA/QC Sample Summary:

- MS/MSDs were performed on sample JHC-MW-15029. Recoveries and relative percent differences (RPDs) were within QC limits.
- Laboratory duplicate analyses were performed on sample JHC-MW-15030; relative percent differences (RPDs) between the parent and duplicate sample were within the QC limits. No non-conformance issues were noted.

Laboratory Data Quality Review

Groundwater Monitoring Event September 2017

CEC JH Campbell Landfill

Groundwater samples were collected by TRC for the September 2017 sampling event. Samples were analyzed for anions, total metals, and total dissolved solids by Pace Analytical Services, LLC (Pace), located in Grand Rapids, Michigan. The laboratory analytical results are reported in laboratory report 462873.

During the September 2017 sampling event, a groundwater sample was collected from each of the following wells:

- JHC-MW-15017
- JHC-MW-15018
- JHC-MW-15019
- JHC-MW-15020
- JHC-MW-15021
- JHC-MW-15022
- JHC-MW-15031
- JHC-MW-15032
- JHC-MW-15033
- JHC-MW-15034
- JHC-MW-15035
- JHC-MW-15036
- JHC-MW-15037

Each sample was analyzed for the following constituents:

Analyte Group	Method
Anions (Chloride, Fluoride, Sulfate)	EPA 300.0
Total Metals	EPA 6020A, EPA 6010C
Total Dissolved Solids	SM 2540C

TRC reviewed the laboratory data to assess data usability. The following sections summarize the data review procedure and the results of the review.

Data Usability Review Procedure

The analytical data were reviewed using the USEPA National Functional Guidelines for Inorganic Superfund Methods Data Review (USEPA, 2017). The following items were included in the evaluation of the data:

- Sample receipt, as noted in the cover page or case narrative;
- Technical holding times for analyses;
- Data for method blanks, equipment blanks, and field blanks. Method blanks are used to assess potential contamination arising from laboratory sample preparation and/or analytical procedures. Field and equipment blanks are used to assess potential contamination arising from field procedures;

- Percent recoveries for matrix spike (MS) and matrix spike duplicates (MSD). Percent recoveries are calculated for each analyte spiked and used to assess bias due to sample matrix effects;
- Reporting limits (RLs) compared to project-required RLs;
- Data for blind field duplicates. Field duplicate samples are used to assess variability introduced by the sampling and analytical processes;
- Data for laboratory control samples (LCSs). The LCSs are used to assess the accuracy of the analytical method using a clean matrix;
- Data for laboratory duplicates, when available. The laboratory duplicates are replicate analyses of one sample and are used to assess the precision of the analytical method; and
- Overall usability of the data.

This data usability report addresses the following items:

- Usability of the data if quality control (QC) results suggest potential problems with all or some of the data;
- Actions regarding specific QC criteria exceedances.

Review Summary

The data quality objectives and laboratory completeness goals for the project were met, and the data are usable for their intended purpose. A summary of the data quality review, including non-conformances and issues identified in this evaluation, are noted below.

- Appendix III constituents will be utilized for the purposes of developing a detection monitoring program.
- Data are usable for the purposes of the detection monitoring program.
- When the data are evaluated through a detection monitoring statistical program, findings below may be used to support the removal of outliers.

QA/QC Sample Summary:

- Two equipment blanks (EB-04 and EB-05) and two field blanks (FB-04 and FB-05) were collected; no analytes were detected in the blank samples.
- Dup-04 corresponds to JHC-MW-15018 and Dup-05 corresponds to JHC-MW-15031; relative percent differences (RPDs) between the parent and duplicate sample were within the QC limits with the following exception:
 - The RPD for total dissolved solids was above QC limits for sample duplicate pair Dup-04/JHC-MW-15018; potential uncertainty exists for total dissolved solids results for Dup-04/JHC-MW-15018 due to duplicate variability.

- MS/MSDs were performed on samples JHC-MW-15017 and JHC-MW-15036.
 - Laboratory MS/MSD analyses were performed on sample JHC-MW-15017 for batch 6315. Chloride and sulfate recoveries in the MS/MSD were below the lower control limits. Chloride and sulfate results for samples analyzed in the same batch may be biased low.
 - Laboratory MS/MSD analyses were performed on sample JHC-MW-15017 for batch 5875. Boron recovery in the MSD was below the lower control limit. The boron concentration in the parent sample was >4x the spike concentration; therefore, the laboratory control limit is not applicable.
- Laboratory duplicate analyses were performed on samples JHC-MW-15017 and JHC-MW-15036. The RPDs between the parent and duplicate sample were within the QC limits.

Appendix C

Statistical Background Limits

Technical Memorandum

Date: January 15, 2018

To: J.R. Register, CEC
Beth Swanberg, CEC
Brad Runkel, CEC

From: Darby Litz, TRC
Sarah Holmstrom, TRC
Joyce Peterson, TRC

Project No.: 269767.0000 Phase 005, Task 003

Subject: Background Statistical Evaluation (R1-R8) – Consumers Energy, JH Campbell Landfill

Pursuant to the United States Environmental Protection Agency's (U.S. EPA's) Resource Conservation and Recovery Act (RCRA) Coal Combustion Residual rule ("CCR Rule") promulgated on April 17, 2015, the owner or operator of a CCR Unit must collect a minimum of eight rounds of background groundwater data to initiate a detection monitoring program and evaluate statistically significant increases above background (40 CFR §257.94). This memorandum presents the background statistical limits derived for the Consumers Energy Company (CEC) Dry Ash Landfill (Landfill) at the JH Campbell (JHC) Power Plant Site (the Site).

The CCR disposal area contains two primary components: a system of wet ash ponds and a dry ash disposal facility (i.e., the JHC Landfill). The wet ash ponds area is approximately 267 acres and is bounded by perimeter dikes with a system of internal dikes separating the individual ash ponds. The dry ash disposal facility is a geomembrane lined landfill which covers an area of about 108 acres and includes two leachate and contact water retention ponds. In response to the CCR Rule, CEC initially had 37 groundwater monitoring wells installed at the JHC Site, of which, 19 were selected to serve as a groundwater monitoring system for the Landfill CCR unit (in accordance with 40 CFR §257.91). Six monitoring wells serve as background wells for the Landfill in addition to the other three CCR units (Pond A, Unit 1-2 North/1-2 South, and Unit 3 North/3 South) at the JHC Site. Thirteen of the monitoring wells JHC-MW-15017 through JHC-MW-15022 and JHC-MW-15031 through JHC-MW-15037 serve as downgradient wells for the Landfill.

Following the baseline data collection period (December 2015 through August 2017), the background data for the JHC site were evaluated in accordance with the Groundwater Statistical Evaluation Plan (Stats Plan) (TRC, October 2017). The JHC Site groundwater data are maintained within a database

Technical Memorandum

accessible through Sanitas™ statistical software. Sanitas™ is a software tool that is commercially available for performing statistical evaluation consistent with procedures outlined in U.S. EPA's Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities (Unified Guidance; UG). Within the Sanitas™ statistical program (and the UG), tolerance limits were selected to perform the statistical calculation for background limits. Use of tolerance limits is a streamlined approach that offers adequate statistical power under the current, initial stage of establishing background and developing the monitoring program and is an acceptable approach for detection monitoring under the CCR rule. Upper tolerance limits (UTLs) were calculated for each of the CCR Appendix III parameters. The following narrative describes the methods employed and the results obtained and the Sanitas™ output files are included as an attachment.

The set of background wells utilized for the Dry Ash Landfill at the JHC site includes JHC-MW-15023 through JHC-MW-15028. The background evaluation included the following steps:

- Review of data quality reports for the baseline/background data sets for CCR Appendix III constituents;
- Graphical representation of the baseline data as time versus concentration (T v. C) by well/constituent pair;
- Graphical representation of cumulative baseline background data sorted from lowest to highest concentration for each constituent;
- Outlier testing of individual data points that appear from the graphical representations as potential outliers;
- Evaluation of percentage of nondetects for each baseline/background well-constituent (w/c) pair;
- Distribution of the data; and
- Calculation of the UTL for each cumulative baseline/background data set (upper and lower tolerance limits were calculated for field pH).

The results of these evaluations are presented and discussed below.

Data Quality

Data from each sampling round were evaluated for completeness, overall quality and usability, method-specified sample holding times, precision and accuracy, and potential sample contamination. The review was completed using the following quality control (QC) information which at a minimum included chain-of-custody forms, investigative sample results including blind field duplicates, and matrix spike and matrix spike duplicates (MS/MSDs) recoveries, and, as provided by the laboratory, method blanks, laboratory control spikes, laboratory duplicates. The data were found to be complete and usable for the purposes of the CCR monitoring program.

Technical Memorandum

Time versus Concentration Graphs

The time versus concentration (T v. C) graphs (Figure 1) do not show potential or suspect outliers for the seven Appendix III parameters.

While variations in results are present, the graphs show consistent baseline data and do not suggest that data sets, as a whole, likely have overall trending or seasonality. The data sets are of relatively short duration for making such observations.

Cumulative Baseline Data Sets

Ideally, the background data sets provide a continuous concentration distribution. The ideal is rarely achieved by multiple background wells representing a relatively large geographic area, such as in the case at the JH Campbell site. When sorted by concentration, the data generally group by smaller subsets of the overall background well network (Figure 2). Most of the parameters have a relatively consistent distribution, but chloride clearly has some wells with higher values than the other background wells. These results need to be taken into consideration as they represent potential non-CCR upgradient contributions to downgradient wells.

Outlier Testing

Because the baseline T v. C graphs (Figure 1) did not show potential outliers, outlier testing was not performed for the JHC background data sets. Had candidate values been present, the Dixon's Outlier Test in Sanitas™ would have been used to test the potential outliers.

Percentage of Nondetects

Table 1 summarizes the percentage of results below the reporting limit for each w/c pair.

Technical Memorandum

Table 1
Summary of Percentage of Baseline Results Below Reporting Limit

WELL	CONSTITUENT	PERCENT NON-DETECT
JHC-MW-15023	Boron	0
	Calcium	0
	Chloride	12.5
	Fluoride	100
	Field pH	0
	Sulfate	0
	Total Dissolved Solids	12.5
JHC -MW-15024	Boron	12.5
	Calcium	0
	Chloride	0
	Fluoride	100
	Field pH	0
	Sulfate	0
	Total Dissolved Solids	0
JHC -MW-15025	Boron	12.5
	Calcium	0
	Chloride	0
	Fluoride	100
	Field pH	0
	Sulfate	0
	Total Dissolved Solids	0
JHC -MW-15026	Boron	100
	Calcium	12.5
	Chloride	0
	Fluoride	100
	Field pH	0
	Sulfate	0
	Total Dissolved Solids	0
JHC -MW-15027	Boron	87.5
	Calcium	0
	Chloride	0
	Fluoride	100
	Field pH	0
	Sulfate	0
	Total Dissolved Solids	0

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Table 1
Summary of Percentage of Baseline Results Below Reporting Limit

WELL	CONSTITUENT	PERCENT NON-DETECT
JHC -MW-15028	Boron	75
	Calcium	0
	Chloride	100
	Fluoride	100
	Field pH	0
	Sulfate	0
	Total Dissolved Solids	12.5
COMBINED	Boron	48
	Calcium	2
	Chloride	19
	Fluoride	100
	Field pH	0
	Sulfate	0
	Total Dissolved Solids	4

Distribution of the Data Sets

The distribution of the data sets is determined by the Sanitas™ software during calculation of the upper tolerance limit. The Shapiro-Wilk test is used for samples sizes fewer than 50. Non-detect/censored data were handled in accordance with the Groundwater Statistical Evaluation Plan. If the data appear to be non-normal, mathematical transformations of the data may be utilized such that the transformed data follow a normal distribution (e.g., lognormal distributions). Alternatively, non-parametric tests may be utilized when data cannot be normalized. Table 2 summarizes the distributions determined by the Sanitas™ software. The distribution is based on the combined baseline results for all six background monitoring wells.

Table 2
Summary of Background/Baseline Data Distributions

CONSTITUENT	DISTRIBUTION
Boron	Nonnormal
Calcium	Normalized by square root transformation
Chloride	Nonnormal
Fluoride	All ND – use highest RL
Field pH	Normal
Sulfate	Normal
Total Dissolved Solids	Normalized by cube root transformation

Technical Memorandum

Upper Tolerance Limits

Table 3 presents the calculated upper tolerance limits for the background/baseline data sets. For normal and lognormal distributions, UTLs are calculated for 95 percent coverage and 95 percent confidence using parametric tolerance limits. For nonnormal background datasets, a nonparametric tolerance limit is utilized, resulting in the highest value from the background dataset as the UTL. The achieved confidence and/or coverage rates depend entirely on the number of background data points, and coverage rates for various confidence levels are shown in the Sanitas™ outputs for nonparametric tolerance limits. Verification resampling (1 of 2) is recommended per the Stats Plan and UG to achieve a site-wide false positive rate within the range specified in the CCR rules.

Table 3
Summary of Baseline Upper Tolerance Limits

CONSTITUENT	UPPER TOLERANCE LIMIT – FROM SANITAS™
Boron	51 µg/L*
Calcium	46 mg/L
Chloride	43 mg/L*
Fluoride	1,000 µg/L*
Field pH	4.8 – 9.2 s.u.
Sulfate	14 mg/L
Total Dissolved Solids	258 mg/L

*Nonparametric Tolerance Limit

Attachments

Figure 1 – Background Concentration Time-Series Charts

Figure 2 – Combined Background Distribution

Sanitas™ Output Files

Technical Memorandum

Figures

Figure 1
Background Time Versus Concentration Graphs

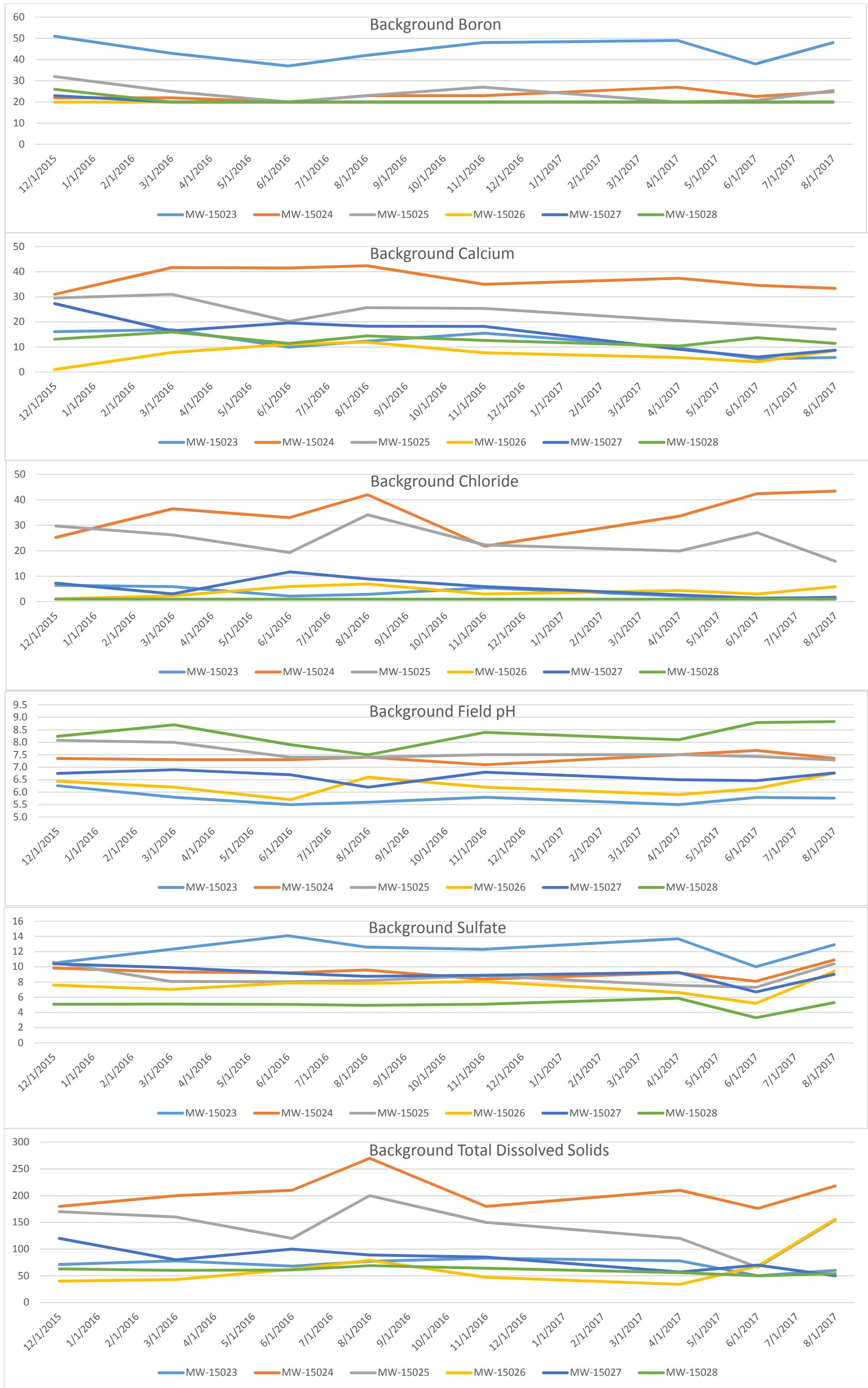
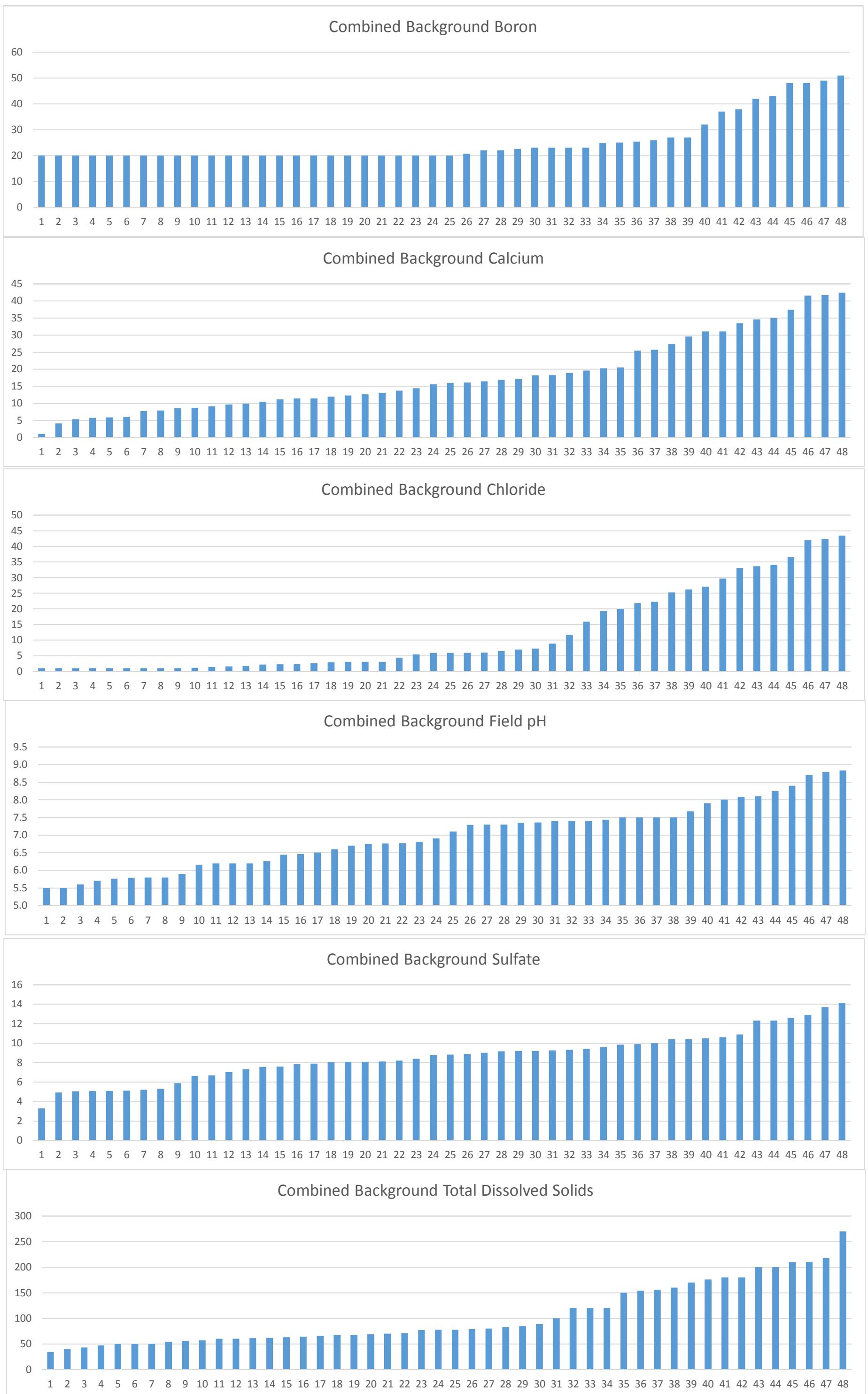


Figure 2
Combined Background Data

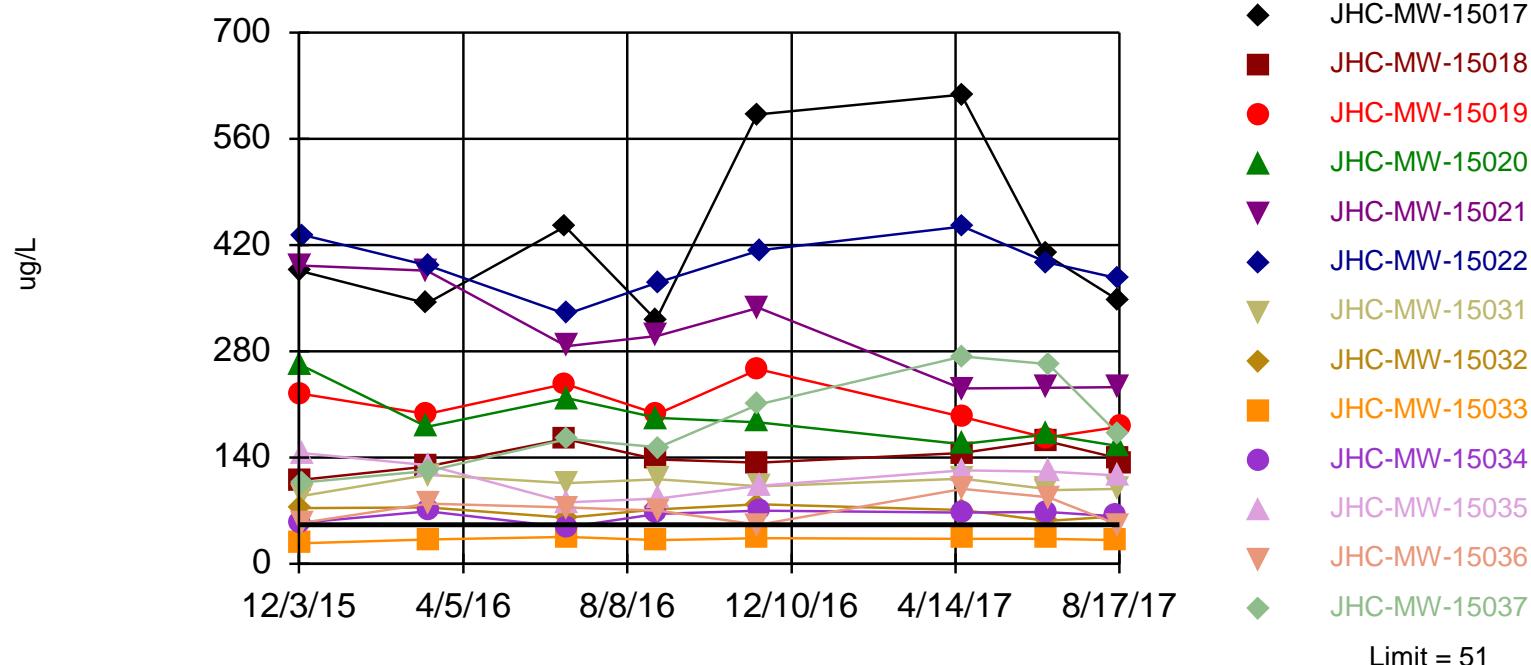


Technical Memorandum

Sanitas™ Output Files

Exceeds Limit: JHC-MW-15017, JHC-MW-15018, JHC-MW-15019, JHC-MW-15020...

Tolerance Limit Interwell Non-parametric



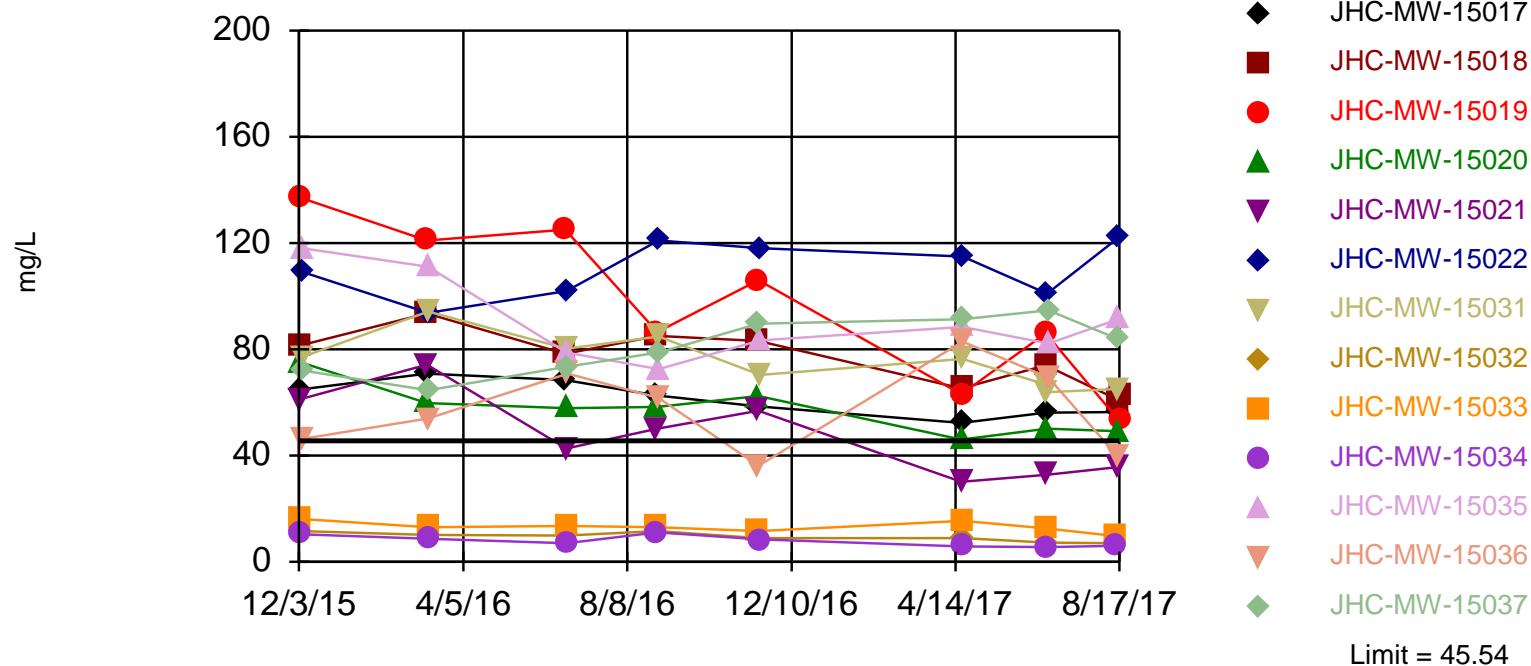
Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Most recent observation is compared with limit. Limit is highest of 48 background values. 47.92% NDs. 90.82% coverage at alpha=0.01; 93.95% coverage at alpha=0.05; 98.63% coverage at alpha=0.5. Report alpha = 0.08526.

Constituent: Boron, Total Analysis Run 11/27/2017 12:17 PM

Client: Consumers Energy Data: JHC_Landfill_Sanitas

Exceeds Limit: JHC-MW-15017, JHC-MW-15018, JHC-MW-15019, JHC-MW-15020...

Tolerance Limit Interwell Parametric



95% coverage. Most recent observation is compared with limit. Background Data Summary (based on square root transformation): Mean=4.032, Std. Dev.=1.309, n=48, 2.083% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9684, critical = 0.929. Report alpha = 0.05.

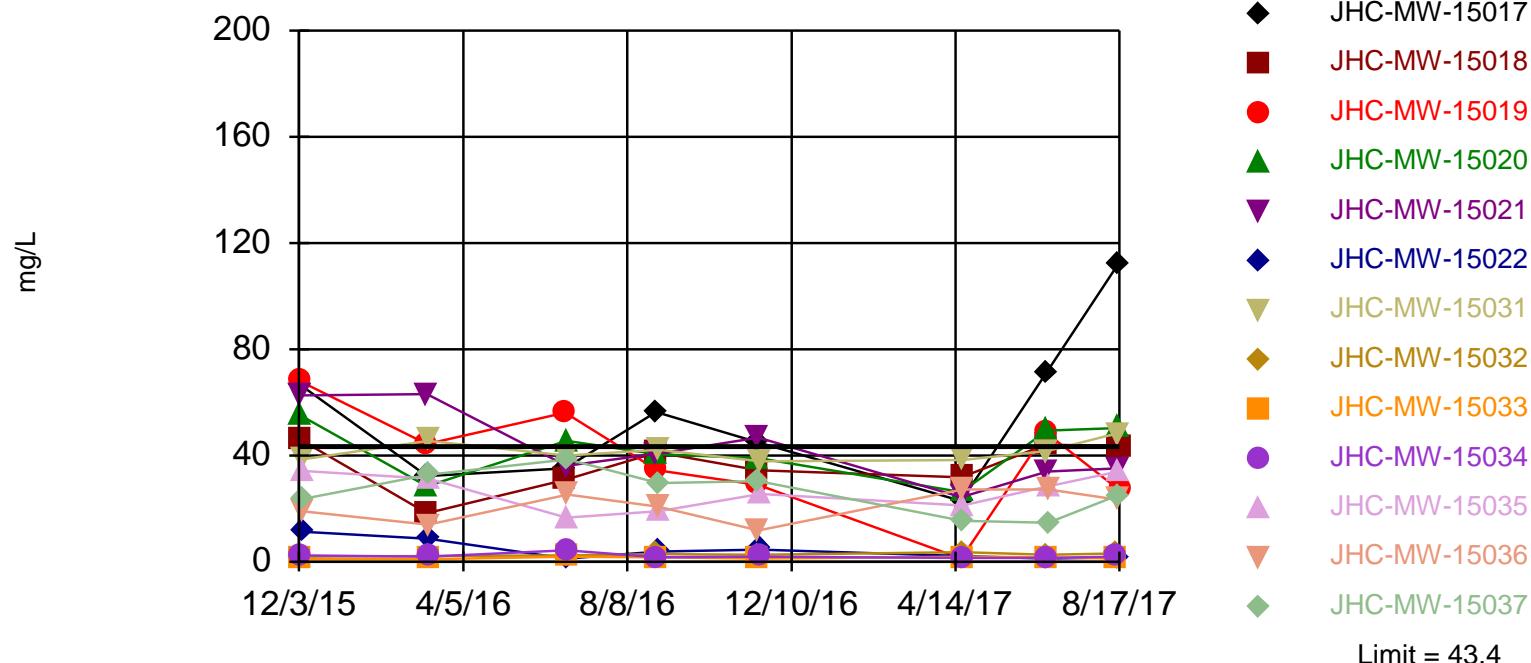
Constituent: Calcium, Total Analysis Run 11/27/2017 3:56 PM

Client: Consumers Energy Data: JHC_Landfill_Sanitas

Sanitas™ v.9.5.32 Sanitas software licensed to Consumers Energy. UG
Hollow symbols indicate censored values.

Exceeds Limit: JHC-MW-15017, JHC-MW-15018,
JHC-MW-15020, JHC-MW-15031

Tolerance Limit Interwell Non-parametric



Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Most recent observation is compared with limit. Limit is highest of 48 background values. 18.75% NDs. 90.82% coverage at alpha=0.01; 93.95% coverage at alpha=0.05; 98.63% coverage at alpha=0.5. Report alpha = 0.08526.

Constituent: Chloride Analysis Run 11/27/2017 12:16 PM

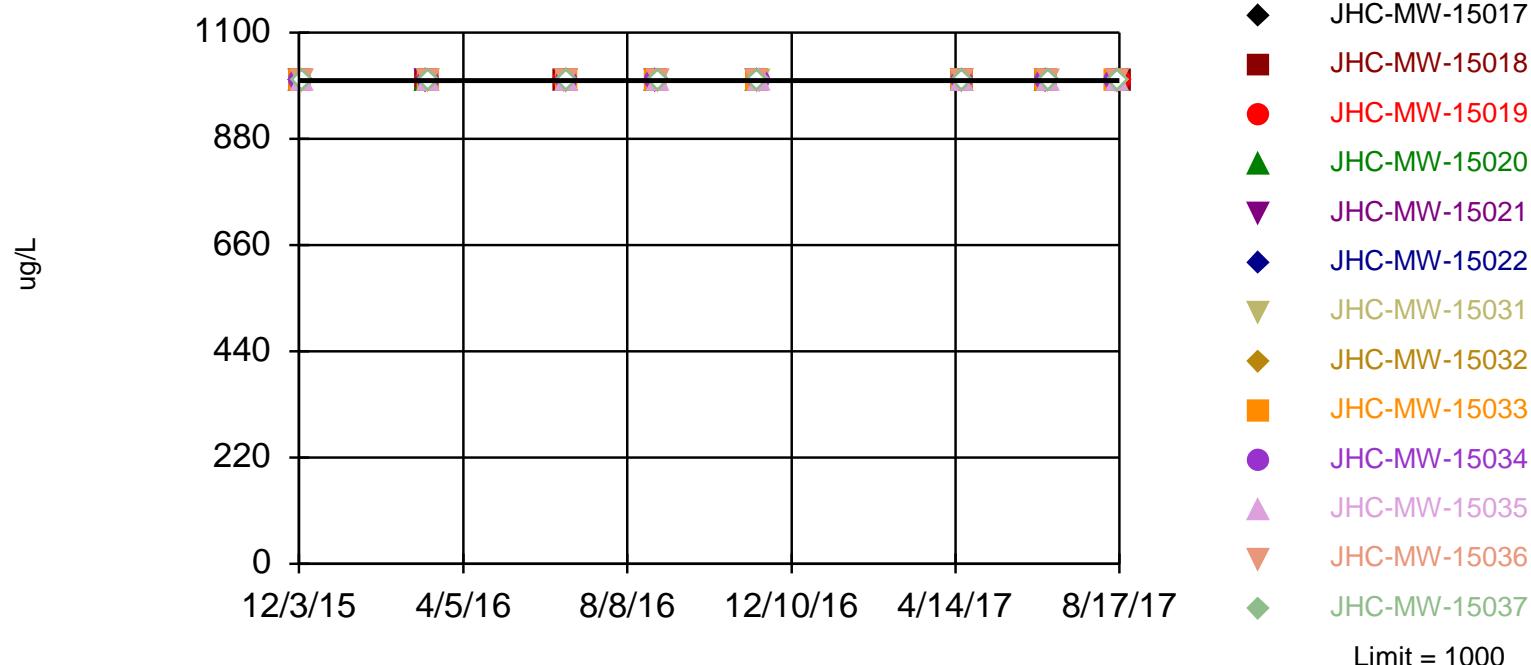
Client: Consumers Energy Data: JHC_Landfill_Sanitas

Sanitas™ v.9.5.32 Sanitas software licensed to Consumers Energy. UG
Hollow symbols indicate censored values.

Within Limit

Tolerance Limit

Interwell Non-parametric



Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 75%. Most recent observation is compared with limit. All background values were censored; limit is most recent reporting limit. 90.82% coverage at alpha=0.01; 93.95% coverage at alpha=0.05; 98.63% coverage at alpha=0.5. Report alpha = 0.08526.

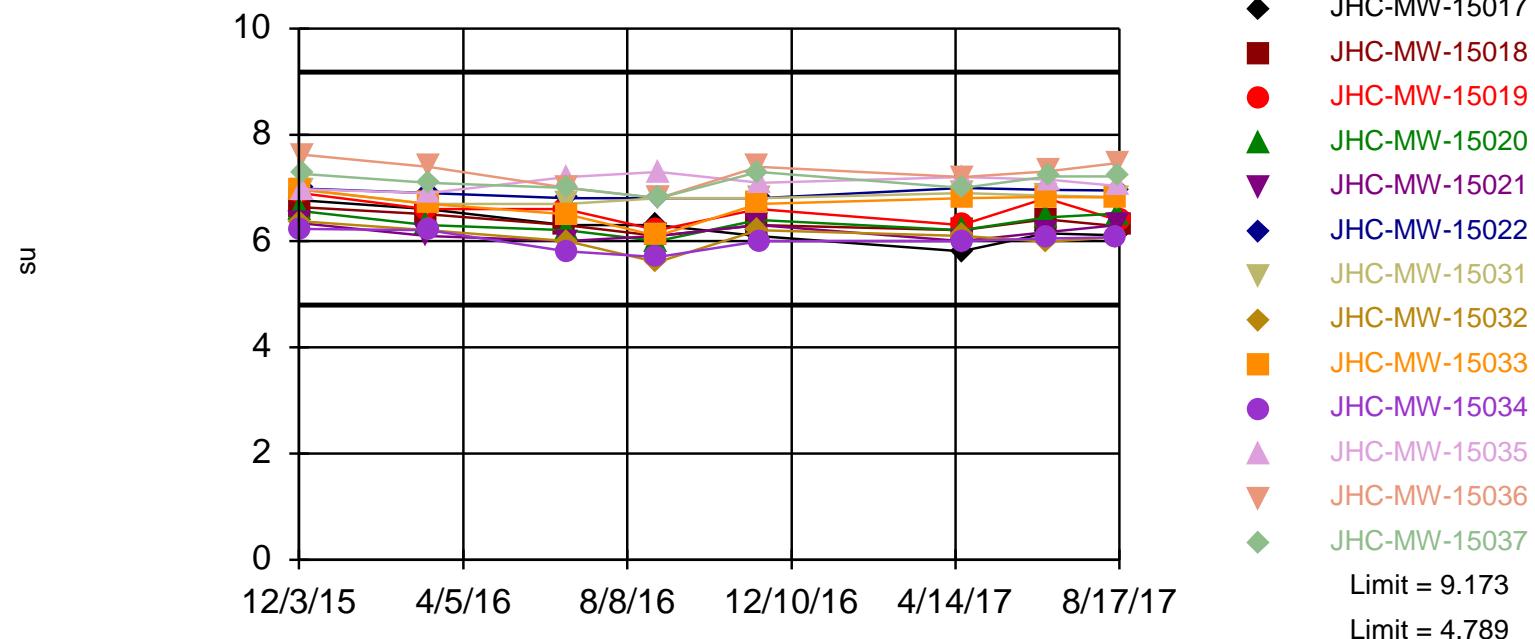
Constituent: Fluoride Analysis Run 11/27/2017 12:16 PM

Client: Consumers Energy Data: JHC_Landfill_Sanitas

Within Limits

Tolerance Limit

Interwell Parametric



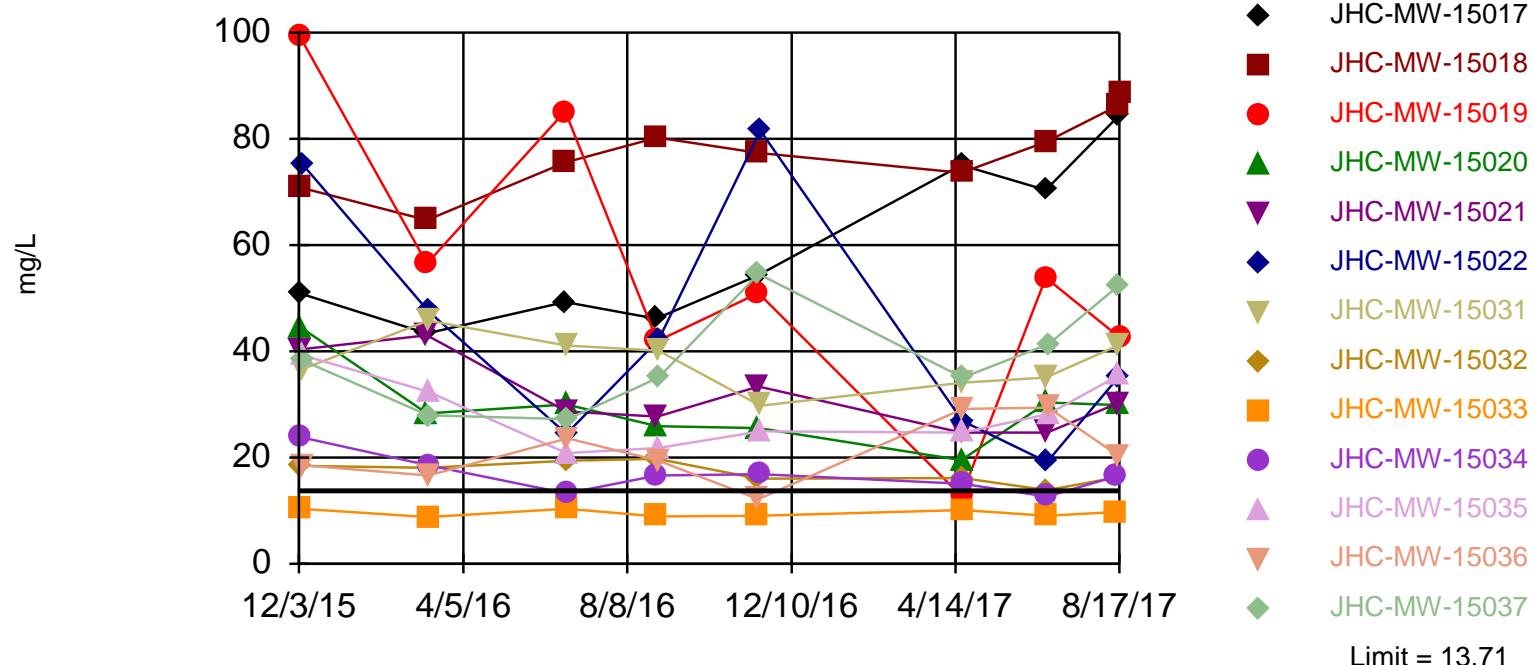
95% coverage. Most recent observation is compared with limit. Background Data Summary: Mean=6.981, Std. Dev.=0.9169, n=48. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9513, critical = 0.929. Report alpha = 0.025 per tail.

Constituent: pH, Field Analysis Run 11/27/2017 12:16 PM

Client: Consumers Energy Data: JHC_Landfill_Sanitas

Exceeds Limit: JHC-MW-15017, JHC-MW-15018, JHC-MW-15019, JHC-MW-15020...

Tolerance Limit Interwell Parametric



95% coverage. Most recent observation is compared with limit. Background Data Summary: Mean=8.61, Std. Dev.=2.458, n=48. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9709, critical = 0.929. Report alpha = 0.05.

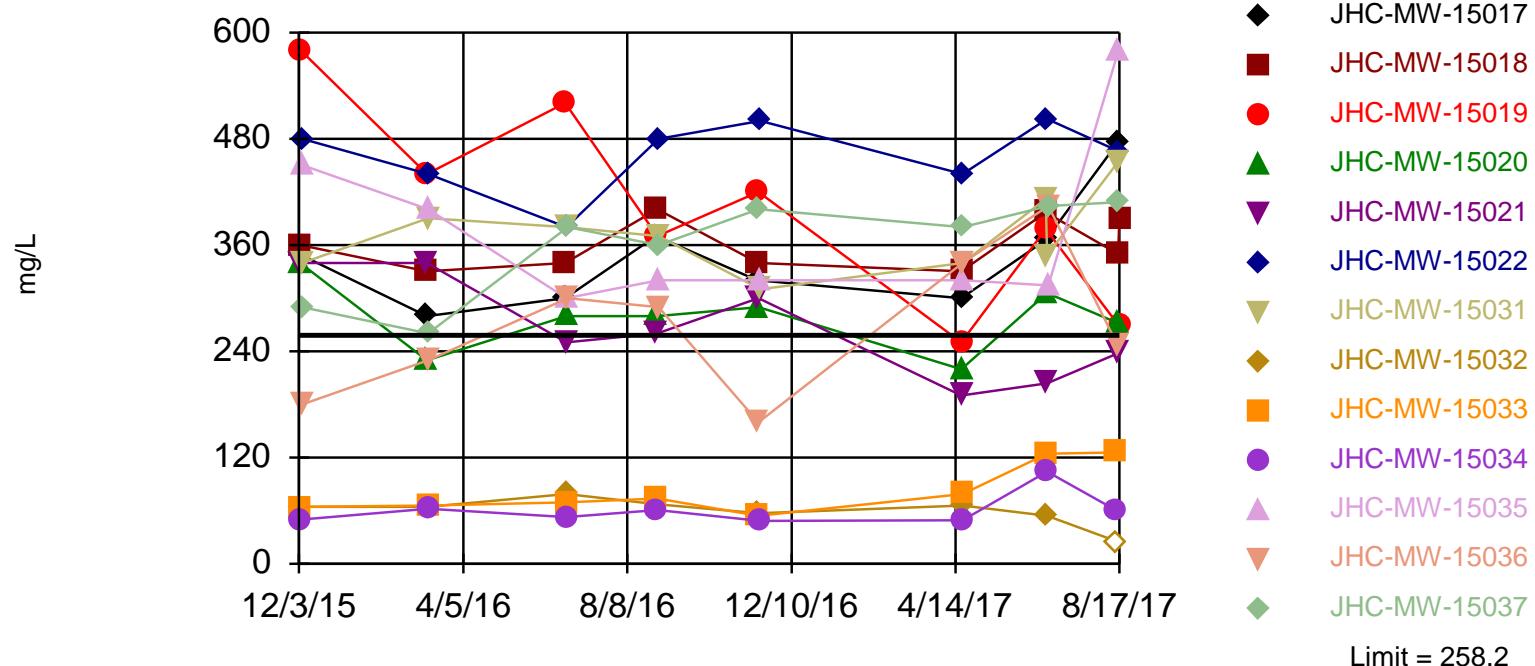
Constituent: Sulfate Analysis Run 11/27/2017 12:15 PM

Client: Consumers Energy Data: JHC_Landfill_Sanitas

Sanitas™ v.9.5.32 Sanitas software licensed to Consumers Energy. UG
Hollow symbols indicate censored values.

Exceeds Limit: JHC-MW-15017, JHC-MW-15018, JHC-MW-15019, JHC-MW-15020...

Tolerance Limit Interwell Parametric



95% coverage. Most recent observation is compared with limit. Background Data Summary (based on cube root transformation): Mean=4.522, Std. Dev.=0.8891, n=48, 4.167% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9351, critical = 0.929. Report alpha = 0.05.

Constituent: Total Dissolved Solids, Dissolved Analysis Run 11/27/2017 3:57 PM

Client: Consumers Energy Data: JHC_Landfill_Sanitas