

2018 Annual Groundwater Monitoring Report

JC Weadock Power Plant Landfill CCR Unit Essexville, Michigan

January 2019



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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) CCR landfill at the JC Weadock (JCW) 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). On behalf of CEC, TRC Environmental Corporation (TRC) has prepared this Annual Groundwater Monitoring Report for calendar year 2018 activities at the JCW Landfill CCR unit.

In the January 31, 2018 Annual Groundwater Monitoring Report for the JC Weadock Power Plant Landfill CCR Unit, covering calendar year 2017 activities, CEC reported that boron, and pH were observed during groundwater detection monitoring at one or more downgradient monitoring well(s) with potential statistically significant increases (SSIs) above background concentration levels. TRC performed an Alternate Source Demonstration (ASD) for the aforementioned constituents and did not find strong enough evidence within 90 days to determine the observation of constituents above background was attributable to a source other than the coal combustion residual (CCR) unit. Therefore, CEC initiated an Assessment Monitoring Program for the JCW Landfill CCR Unit pursuant to §257.95 of the CCR Rule that included sampling and analyzing groundwater within the groundwater monitoring system for all constituents listed in Appendix IV. The JCW Landfill monitoring system was subsequently sampled for the Appendix III and Appendix IV constituents in May 2018, within 90 days from the initial assessment monitoring (Appendix IV only) sampling event. The results from the initial assessment monitoring sampling event were used to establish groundwater protection standards (GWPSs) for the Appendix IV constituents in accordance with §257.95(h), as presented in the Groundwater Protection Standards technical memorandum dated October 15, 2018 (TRC, October 2018). Assessment monitoring data that has been collected and evaluated in 2018, including the establishment of the GWPSs, are presented in this report.

In 2019, CEC compared the assessment monitoring data to the GWPSs to determine whether or not Appendix IV constituents are detected at statistically significant levels above the GWPSs in accordance with §257.95. The statistical comparison of the May 2018 data to the GWPSs was completed on January 14, 2019, in accordance with §257.93(h)(2) and within the compliance schedule clarified by EPA in April 2018.

According to §257.95(g)(3), if the facility determines pursuant to §257.93(h), that any Appendix IV constituents were detected at a statistically significant level exceeding the GWPSs, the facility will either conduct an alternate source demonstration or initiate an assessment of corrective measures according to §257.96 within 90 days. Based on the results of the statistical evaluation CEC will be seeking to initiate an assessment of corrective measures within 90 days of the completion of the statistical analysis. CEC will continue executing the self-implementing groundwater compliance schedule in conformance with §257.90 - §257.98.

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) CCR landfill at the former JC Weadock (JCW) 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). On behalf of CEC, TRC Environmental Corporation (TRC) has prepared this Annual Groundwater Monitoring Report for calendar year 2018 activities at the JCW Landfill CCR unit.

In the January 31, 2018 Annual Groundwater Monitoring Report for the JC Weadock Power Plant Landfill CCR Unit, covering calendar year 2017 activities, CEC reported that Appendix III constituents boron, and pH were observed during groundwater detection monitoring at one or more downgradient monitoring well(s) with potential statistically significant increases (SSIs) above background concentration levels. TRC performed an Alternate Source Demonstration (ASD) for the aforementioned constituents and did not find strong enough evidence within 90 days to determine the observation of constituents above background was attributable to a source other than the coal combustion residual (CCR) unit. Therefore, CEC initiated an Assessment Monitoring Program for the JCW Landfill CCR Unit pursuant to §257.95 of the CCR Rule that included sampling and analyzing groundwater within the groundwater monitoring system for all constituents listed in Appendix IV.

The results from the initial assessment monitoring sampling event were used to establish groundwater protection standards (GWPSs) for the Appendix IV constituents in accordance with §257.95(h), as presented in the *Groundwater Protection Standards* technical memorandum dated October 15, 2018 (Appendix C) (TRC, October 2018). The JCW Landfill monitoring system was subsequently sampled for the Appendix III and Appendix IV constituents within 90 days from the initial Appendix IV sampling event. Assessment monitoring data that has been collected and evaluated in 2018 are presented in this report.

1.2 Site Overview

The JCW coal-fired Power Plant Site is located south of the DE Karn Power Plant site (DEK site), east of the Saginaw River, west of Underwood Drain and Saginaw Bay, and north of Tacey Drain and agricultural land (Figure 1). A discharge channel separates the site from the DEK site to the north. The plant, located on the western edge of the property, began generating electricity in 1940. Six power generating units were in operation from 1940 until they were retired in 1980. In 1958 and 1959, two additional units were added. JCW ceased generating electricity on April 15, 2016.

The area authorized for disposal of solid waste is located east of the JCW plant (Figure 2). The JCW Solid Waste Disposal Area is a 292-acre Type III low hazard industrial waste landfill, permitted for construction in 1992, and is governed by the Part 115 Solid Waste Disposal Area Operating License No. 9440 dated June 26, 2015. The JCW Solid Waste Disposal Area is currently authorized under a permit (Groundwater Discharge Authorization GWE-0005) issued pursuant to Part 31¹ to discharge to the unusable aquifer directly underlying the solid waste that vents almost immediately to the Saginaw River and Saginaw Bay. Interim monitoring and compliance monitoring pursuant to Part 31 and Part 115² detailed in the MDEQ approved Part 115 *Hydrogeological Monitoring Plan Rev. 2: JC Weadock Solid Waste Disposal Area* (June 5, 2015). This existing CCR Landfill is delineated by the acreage of the solid waste disposal area permitted for the vertical expansion and bounded by a soil-bentonite slurry wall constructed along the centerline of the perimeter embankment dike to a depth that it is keyed in the competent confining clay underlying the unit.

An additional unit subject to the CCR rule is the JCW Bottom Ash Pond (BAP), which is located immediately west of the historic pond/landfill area and outside of the soil-bentonite slurry wall. The bottom ash pond is the primary settling/detention structure for the National Pollutant Discharge Elimination System (NPDES) treatment system prior to discharge and characterized as an existing CCR surface impoundment. This report focuses on the JCW Landfill CCR unit.

1.3 Geology/Hydrogeology

The majority of JCW Landfill area is comprised of surficial CCR and sand fill. USGS topographic maps and aerial photographs dating back to 1938, in addition to field descriptions of subsurface soil at the site, indicate that the site was largely developed by reclaiming low-lands through construction of perimeter dikes and subsequent ash filling.

¹ Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994.

² Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994.

The surficial fill consists of a mixture of varying percentages of ash, sand, and clay-rich fill ranging from 5 to 15 feet thick. Below the surficial fill, native alluvium and lacustrine soils are present at varying depths. Along the perimeter of the landfill, there is a well-graded sand present at depths ranging from 10 to 20 feet below ground surface (ft bgs). The sand is variable in thickness, ranging from <1 to ~6.5 feet, and is discontinuous along the landfill perimeter, as evidenced by the soil boring logs and slurry wall construction documentation. Beneath the surficial fill and sand unit (where present) is 70 to 80 feet of clay till, which acts as an aquiclude and separates the shallow groundwater from the confined sandstone unit, generally encountered at 80-90 ft bgs. Along the southern perimeter of the landfill, some of the upper portion of the clay till (generally >20 ft-bgs) is sand-rich.

In order to reduce porewater flux from the land disposal area, CEC completed construction of a soil-bentonite slurry wall at the site in December 2008. Originally, the slurry wall enclosed the historical fly ash disposal area except for a small segment along the perimeter dike that was designed to vent along the discharge channel immediately upgradient from the NPDES external outfall to prevent water from building up within the site. In July 2018, this vent was closed and the slurry wall reduced porewater flux around the entire perimeter of the JCW landfill. A final cover system will be constructed on the JCW landfill as a part of final closure.

The site is bound by several surface water features (Figure 1): the Saginaw River to the west, a discharge channel and Saginaw Bay (Lake Huron) to the north, Underwood Drain to the east, and Tacey Drain to the south. Groundwater flow in the upper aquifer is largely controlled by the surface water elevations of Saginaw River and Saginaw Bay. In general, shallow groundwater is encountered at a similar or slightly higher elevation relative to the surrounding surface water features. Prior to July 2018, the shallow groundwater flow beneath the JCW Landfill was directed north to the discharge channel due to the vent (e.g. opening) in the bentonite/soil slurry wall. In July 2018, this vent was closed and the slurry wall is now continuous along the entire perimeter of the JCW landfill, thereby reducing the flux of porewater from the landfill.

Section 2 Groundwater Monitoring

2.1 Monitoring Well Network

In accordance with §257.91, CEC established a groundwater monitoring system for the JCW Landfill Unit in October 2017, which consisted of seven monitoring wells that are screened in the uppermost aquifer (four background monitoring wells and three downgradient monitoring wells). The monitoring well locations are shown on Figure 2.

Four monitoring wells located south of the JCW landfill provide data on background groundwater quality that has not been affected by the CCR unit (MW-15002, MW-15008, MW-15016, and MW-15019). Due to the site hydrogeology and operational history of the site, a hydraulically upgradient location was not available to monitor this CCR unit. The area where background wells are located, while not upgradient, is not affected by any CCR units and therefore meets the requirements of § 257.91(a)(1). Background groundwater quality data from these four background wells are additionally used for groundwater monitoring program for the JCW BAP CCR unit as well as the DEK BAP unit.

When the monitoring well network was first established in October 2017, there was a 1,600-linear-foot section of the perimeter embankment dike that did not have a slurry wall in place. Groundwater flow beneath the JCW landfill was directed towards the discharge channel through this vent in the slurry wall for management under the existing NPDES discharge permit. The downgradient monitoring well network was established as three monitoring wells located in the vent area to assess the quality of groundwater passing the waste boundary (JCW-MW-15011, JCW-MW-15012, and JCW-MW-15023). The seven well monitoring well network was sampled during the preliminary assessment monitoring that occurred in April 2018 as well as the subsequent semi-annual assessment monitoring event in May 2018.

In June 2018, the slurry wall vent was closed to reduced porewater flux around the entire perimeter of the JCW landfill. The three existing downgradient CCR compliance wells were decommissioned by overdrilling, removing the well material, and sealing the borehole in order to allow for the slurry wall construction. The monitoring well decommissioning logs are attached in Appendix A.

Given the change in groundwater flow conditions, a revised groundwater monitoring system has been established to assess slurry wall integrity and determine if there have been any releases from the JCW Landfill CCR unit. The monitoring well network has been designed to provide appropriate coverage for water level and water quality data collection along the

perimeter of the landfill. CEC installed an additional nine (9) monitoring wells in August 2018 to supplement the preexisting groundwater well network currently used under the approved 2015 HMP for Michigan Part 115 compliance to provide appropriate coverage for the collection of groundwater levels and water quality data along the perimeter of the JCW landfill.

Therefore, the modified CCR monitoring well network now consists of the four (4) background as discussed above, and eleven (11) downgradient monitoring wells as discussed in the *Sample and Analysis Plan* (2018 SAP) (TRC, 2018) and *Statistical Analysis Plan* (2018 Stats Plan) (TRC, 2018b). The downgradient monitoring wells include:

JCW-MW-18001	JCW-MW-18004	JCW-MW-18005	JCW-MW-18006
MW-50	MW-51	MW-52	MW-53
MW-54R	MW-55	OW-57R Out	

These monitoring well locations are shown on Figure 5. Soil boring logs and well construction diagrams are included in Appendix A.

2.2 Preliminary Assessment Monitoring

CEC reported in the 2017 Annual Report that Appendix III constituents boron and pH were observed within groundwater at one or more downgradient monitoring well(s) with potential SSIs above background concentration levels. TRC performed an ASD for the constituents and did not find strong enough evidence within 90 days to determine the observation of constituents above background was attributable to a source other than the CCR unit. Therefore, CEC initiated an Assessment Monitoring Program for the JCW Landfill CCR Unit pursuant to §257.95 of the CCR Rule that included sampling and analyzing groundwater within the groundwater monitoring system for all constituents listed in Appendix IV. The monitoring was performed in accordance with the JC Weadock Monitoring Program Sample Analysis Plan (2016 SAP) (ARCADIS, May 2016).

2.2.1 Data Summary

The preliminary Appendix IV only assessment monitoring event (per §257.95(b)) was performed on April 9 through April 12, 2018. Downgradient monitoring JCW-MW-15011, JCW-MW-15012, and JCW-MW-15023, and background monitoring wells MW-15002, MW-15008, MW-15016, and MW-15019 were sampled during this monitoring event.

Static water elevation measurements were collected from all monitoring well locations. Static water elevation data are summarized in Table 1 and groundwater elevation data are shown on Figure 3. Monitoring wells were purged with peristaltic pumps or submersible pumps utilizing low-flow sampling methodology. Field parameters were

stabilized at each monitoring well prior to collecting groundwater samples. Field parameters for each monitoring well are summarized in Table 2.

The groundwater samples were analyzed by Pace Analytical Services, LLC (Pace) for Appendix IV constituents during the preliminary assessment monitoring event in accordance with the 2016 SAP. The analytical results are summarized in Table 3.

2.2.2 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. The data quality reviews are summarized in Appendix A.

2.2.3 Groundwater Flow Rate and Direction

Groundwater elevation data collected during the April 2018 assessment monitoring event were generally similar to data collected previously in the background and detection monitoring events.

Groundwater elevations at the site are generally within the range of 580 to 584 feet above mean sea level (ft AMSL) and groundwater is typically encountered at a similar or slightly higher elevation relative to the surrounding surface water features, flowing outward toward the bounding surface water features. Groundwater elevations measured during the April 2018 sampling event are provided on Table 1 and were used to construct groundwater contour map (Figure 3).

The figure shows that current groundwater flow continues to flow to the north toward the discharge channel due to the bentonite/soil slurry wall. The geometric mean hydraulic gradient throughout the JCW Landfill CCR unit area during these events is estimated at 0.0077 ft/ft. The gradient was calculated using the well pair JCW-MW-15011/JCW-MW-15023, as well as the well water elevation difference and distance between JCW-MW-15012 and the discharge channel. Using the mean hydraulic conductivity of 16 ft/day (ARCADIS, 2016) and an assumed effective porosity of 0.3, the estimated average seepage velocity was approximately 0.41 ft/day or 150 ft/year, which is consistent with previous estimates. 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 IV constituents that could potentially migrate from the JCW Landfill CCR unit.

2.3 Semiannual Groundwater Monitoring

Per §257.95(d), within 90 days of the preliminary assessment monitoring event and semiannually thereafter, all wells must be resampled and analyzed for all constituents from Appendix III and for those constituents in Appendix IV of the CCR Rule that were detected during prior sampling. In addition to the Appendix III and IV constituents, field parameters including dissolved oxygen, oxidation reduction potential, specific conductivity, temperature, and turbidity were collected at each well. Samples were collected and analyzed according to the SAP.

2.3.1 Data Summary

The first semiannual groundwater assessment monitoring event for 2018 was performed on May 21 through May 24, 2018 by TRC personnel and samples were analyzed by Pace in accordance with the 2016 SAP. Static water elevation data were collected at all monitoring well locations. Groundwater samples were collected from the four background monitoring wells and three downgradient monitoring wells for the Appendix III and Appendix IV constituents and field parameters. A summary of the groundwater data collected during the May 2018 event is provided on Table 1 (static groundwater elevation data), Table 2 (field data), and Table 3 (analytical results).

The second semiannual groundwater assessment monitoring event for 2018 was performed on November 5 through November 9, 2018 by TRC personnel and samples were analyzed by Pace in accordance with the 2018 SAP. Static water elevation data were collected at all monitoring well locations. Groundwater samples were collected from the four background monitoring wells and three downgradient monitoring wells for the Appendix III and Appendix IV constituents and field parameters. As of the writing of this report, lab analysis and data quality review are ongoing. Therefore, a summary of groundwater data will be provided under separate cover after laboratory analysis is complete and results have been reviewed for usability. Consumers Energy will enter this information into the operating record as soon as it is available and will include it in the forthcoming 2019 Annual Groundwater Monitoring and Corrective Action Report.

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. The data quality reviews are summarized in Appendix A.

2.3.3 Groundwater Flow Rate and Direction

Groundwater elevation data collected during the May 2018 assessment monitoring events were generally similar to data collected previously in the background and detection monitoring events.

Groundwater elevations at the site are generally within the range of 580 to 584 feet above mean sea level (ft AMSL) and groundwater is typically encountered at a similar or slightly higher elevation relative to the surrounding surface water features, flowing outward toward the bounding surface water features. Groundwater elevations measured during the May 2018 sampling event are provided on Table 1 and were used to construct groundwater contour map (Figure 4).

The figure shows that current groundwater flow continues to flow to the north toward the discharge channel due to the bentonite/soil slurry wall. The geometric mean hydraulic gradient throughout the JCW Landfill CCR unit area during these events is estimated at 0.0091 ft/ft. The gradient was calculated using the same well pairs as the aforementioned April 2018 event. Using the mean hydraulic conductivity of 16 ft/day (ARCADIS, 2016) and an assumed effective porosity of 0.3, the estimated average seepage velocity ranged from approximately 0.48 ft/day or 180 ft/year, which is consistent with previous estimates. 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 IV constituents that could potentially migrate from the JCW Landfill CCR unit.

Section 3 Statistical Evaluation

3.1 Establishing Groundwater Protection Standards

In accordance with §257.95(h) and the *Groundwater Statistical Evaluation Plan* (2017 Stats Plan) (TRC, October 2017), groundwater protection standards (GWPSs) were established for the Appendix IV constituents following the preliminary assessment monitoring event using nine rounds of data collected from the background monitoring wells MW-15002, MW-15008, MW-15016, and MW-15019 (December 2015 through April 2018). The calculation of the GWPSs is documented in the *Groundwater Protection Standards* technical memorandum included in Appendix C of this annual report (TRC, October 2018). The GWPS is established as the higher of the EPA Maximum Contaminant Level (MCL) or statistically derived background level for constituents with MCLs and the higher of the EPA Regional Screening Levels (RSLs) or background level for constituents with RSLs. The Appendix IV GWPSs will be used to assess whether groundwater has been impacted from the JCW Landfill CCR unit by statistically comparing concentrations in the downgradient wells to the GWPSs for each Appendix IV constituents.

3.2 Data Comparison to Groundwater Protection Standards

Consistent with the *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance* (Unified Guidance) (USEPA, 2009), the preferred method for comparisons to a fixed standard are confidence limits. An exceedance of the standard occurs when the 99 percent lower confidence level of the downgradient data exceeds the GWPS. The statistical data comparison was reported on January 14, 2019, within 90 days of establishing the GWPSs in accordance with §257.93(h)(2) and within the compliance schedule clarified by the USEPA in a letter dated April 30, 2018 (USEPA, April 2018).

The statistical evaluation report has been entered into operating record by CEC on January 14, 2019 in accordance with §257.105(h)(8). Notification of the statistical analysis of the assessment monitoring data compared to the GWPS, if necessary, will be made in accordance with §257.106(h) and posting such notification to the publicly accessible compliance website in accordance with §257.107(h) will be completed within 30 days of the completion of the statistical analysis. This evaluation will be included in the forthcoming 2019 Annual Groundwater Monitoring and Corrective Action Report since it was completed in calendar year 2019.

Subsequently, following receipt of final laboratory reports for all Appendix IV constituents and completion of data quality review, the results from the November 2018 semiannual sampling

event will also be statistically compared to the GWPSs using the same approach as the initial event. It is anticipated that the statistical comparison of the second semiannual 2018 event will be completed in March/April 2019.

Consumers Energy will enter this information into the operating record as soon as it is available and include it in the forthcoming 2019 Annual Groundwater Monitoring and Corrective Action Report.

Section 4 Conclusions and Recommendations

Semiannually after triggering assessment monitoring, groundwater samples will be collected from the groundwater monitoring system wells and analyzed for Appendix III and Appendix IV constituents pursuant to §257.95(d). In accordance with §257.93(h)(2) and within the compliance schedule clarified by the EPA in April 2018, the first round of semiannual assessment monitoring data were statistically evaluated against the GWPSs on January 14, 2019. CEC has placed this analysis in the operating record in accordance with §257.105(h)(8) on January 14, 2019. Notification that one or more Appendix IV constituents have been detected at statistically significant levels above the GWPS will be submitted, if necessary, in accordance with §257.106(h) and posting such notifications to the publicly accessible compliance website in accordance with §257.107(h) will be completed within 30 days of the completion of the statistical analysis. This evaluation will be included in the forthcoming 2019 Annual Groundwater Monitoring and Corrective Action Report since it was completed in calendar year 2019.

According to §257.95(g)(3), if the facility determines pursuant to §257.93(h), that any Appendix IV constituents were detected at a statistically significant level exceeding the GWPSs, the facility will either conduct an alternate source demonstration or initiate an assessment of corrective measures according to §257.96 within 90 days. Based on the results of the statistical evaluation CEC will be seeking to initiate an assessment of corrective measures within 90 days of the completion of the statistical analysis. CEC will continue executing the self-implementing groundwater compliance schedule in conformance with §257.90 - §257.98.

In addition, the statistical evaluation of the second semiannual 2018 monitoring event is anticipated to be completed in March/April 2019 and will be posted to the public website within 30 days of being finalized. Consumers Energy will enter this information into the operating record as soon as it is available and include it in the forthcoming 2019 Annual Groundwater Monitoring and Corrective Action Report.

The next semiannual monitoring event is tentatively scheduled for the second calendar quarter of 2019.

Section 5 References

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- USEPA. July 2018. 40 CFR Part 257. Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Amendments to the National Minimum Criteria (Phase One, Part One); Final Rule. 83 Federal Register 146 (July 30, 2018), pp. 36435-36456 (83 FR 36435).
- USEPA. April 2018. Barnes Johnson (Office of Resource Conservation and Recovery) to James Roewer (c/o Edison Electric Institute) and Douglas Green, Margaret Fawal (Venable LLP). Re: Coal Combustion Residuals Rule Groundwater Monitoring Requirements. April 30, 2018. United States Environmental Protection Agency, Washington, D.C. 20460. Office of Solid Waste and Emergency Response, now the Office of Land and Emergency Management.

Tables

Table 1
Summary of Groundwater Elevation Data
DE Karn and JC Weadock – RCRA CCR Monitoring Program
Essexville, Michigan

	тос		Scree	n In	nterval	April 9	9, 2018	May 1	4, 2018
Well Location	Elevation (ft)	Geologic Unit of Screen Interval Screen Interval (ft)		ion	Depth to Water (ft BTOC)	Groundwater Elevation (ft)	Depth to Water (ft BTOC)	Groundwater Elevation (ft)	
Background						(11 10 10 0)	(11)	(11.00)	(11)
MW-15002	587.71	Sand	580.9	to	570.9	6.65	581.06	6.57	581.14
MW-15008	585.36	Sand with clay	578.7	to	568.7	4.38	580.98	4.15	581.21
MW-15016	586.49	Sand	581.2	to	578.2	4.06	582.43	4.34	582.15
MW-15018	586.42	Sand	580.6	to	576.6	5.07	581.35	5.33	581.09
MW-15019	586.17	Sand and Sand/Clay	579.5	to	569.5	5.21	580.96	5.13	581.04
MW-15020	585.95	Sand	578.5	to	568.5	5.08	580.87	4.81	581.14
MW-15024	586.56	Sand	579.7	to	569.7	5.80	580.76	5.50	581.06
MW-15027	586.25	Sand	578.2	to	568.2	5.37	580.88	5.11	581.14
DEK Bottom Ash Po	nd		•						•
DEK-MW-15001 ⁽¹⁾	594.64	Sand	576.1	to	575.1	11.44	583.20		
DEK-MW-18001 ⁽¹⁾	593.47	Sand	579.2	to	574.2			8.49	584.98
DEK-MW-15002	590.87	Sand	578.3	to	575.3	4.57	586.30	4.41	586.46
DEK-MW-15003	602.80	Sand	578.8	to	574.8	14.24	588.56	14.11	588.69
DEK-MW-15004	611.05	Sand	576.6	to	571.6	22.91	588.14	22.87	588.18
DEK-MW-15005	589.72	Sand	572.3	to	567.3	9.10	580.62	8.67	581.05
DEK-MW-15006	589.24	Sand	573.0	to	568.0	8.60	580.64	8.20	581.04
JCW Bottom Ash Po	ond								
JCW-MW-15007	587.40	Sand	582.7	to	579.2	3.69	583.71	3.89	583.51
JCW-MW-15009	589.64	Sand	581.9	to	576.9	8.48	581.16	8.09	581.55
JCW-MW-15010	597.76	Sand	579.7	to	578.2	16.37	581.39	15.55	582.21
JCW-MW-15028	589.37	Sand	567.7	to	564.7	6.93	582.44	6.84	582.53
JCW Landfill									
JCW-MW-15011	597.07	Sand	582.4	to	578.9	14.36	582.71	13.59	583.48
JCW-MW-15012	595.07	Sand and Clay	581.4	to	576.4	14.48	580.59	13.75	581.32
JCW-MW-15023	595.32	Sand	579.7	to	574.7	13.36	581.96	12.66	582.66

Notes:

Survey data from: Rowe Professional Services Company (Nov. 2015) and Consumers Energy Company drawings: SG-21733, Sheet 1, Rev. G (Karn, 11/27/18); and SG-21733, Sheet 2, Rev. C (Weadock, 11/27/18). 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.

^{--:} Not measured.

^{(1) -} DEK-MW-15001 was decommissioned on April 18, 2018 due to the installation of the new Karn Lined Impoundment. DEK-MW-18001 was installed on May 21, 2018.

Table 2
Summary of Field Parameter Results – April and May 2018
JC Weadock Landfill – RCRA CCR Monitoring Program
Essexville, Michigan

Sample Location	Sample Date	Dissolved Oxygen	Oxidation Reduction Potential	рН	Specific Conductivity	Temperature	Turbidity
		(mg/L)	(mV)	(SU)	(umhos/cm)	(°C)	(NTU)
Background							
MW-15002	4/9/2018	0.31	23.4	6.7	9,267	7.4	2.3
IVIVV-15002	5/22/2018	0.32	-29.7	7.0	6,259	11.0	4.8
NAVA 45000	4/10/2018	0.19	-5.6	6.6	1,507	6.4	4.9
MW-15008	5/22/2018	0.24	-33.8	6.8	1,456	9.4	4.6
MM 45040	4/10/2018	1.33 45.7 7.3		1,675	4.7	3.8	
MW-15016	5/22/2018	0.34	45.4	7.3	1,547	13.3	1.7
MW 45040	4/9/2018	0.25	-58.1	6.8	2,091	5.9	3.8
MW-15019	5/22/2018	0.23	-53.1	6.9	2,030	9.4	3.9
Landfill					•		
ICW MW 45044	4/11/2018	0.21	-100.6	7.1	946	10.5	1.2
JCW-MW-15011	5/21/2018	0.22	-277.9	7.0	1,095	12.1	1.6
10\0\0\0\0\0	4/11/2018	0.34	12.7	6.9	897	9.2	2.7
JCW-MW-15012	5/21/2018	0.34	-8.6	7.0	830	11.3	2.9
10\\\\ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	4/11/2018	0.21	-85.1	7.4	869	10.4	3.7
JCW-MW-15023	5/21/2018	0.31	-89.8	7.5	715	11.2	4.3

Notes:

mg/L - Milligrams per Liter.

mV - Millivolts.

SU - Standard units.

umhos/cm - Micromhos per centimeter.

°C - Degrees Celcius

NTU - Nephelometric Turbidity Unit.

Table 3

Summary of Groundwater Sampling Results (Analytical) – April and May 2018 JC Weadock Landfill – RCRA CCR Monitoring Program

Essexville, Michigan

				Sa	ample Location:	JCM-W	W-15011	JCW-M	W-15012	JCW-M	W-15023
					Sample Date:	4/11/2018	5/21/2018	4/11/2018	5/21/2018	4/11/2018	5/21/2018
Constituent	Unit	EPA MCL	MI Residential*	MI Non- Residential*	MI GSI^			downgradient			
Appendix III											
Boron	ug/L	NC	500	500	4,000		1,790		1,040		1,170
Calcium	mg/L	NC	NC	NC	500		131		102		62.2
Chloride	mg/L	250**	250	250	50		65.5		32.7		70.1
Fluoride	ug/L	4,000	NC	NC	NC	< 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 - 8.5	6.5 - 9.0	7.08	7.04	6.93	6.98	7.35	7.54
Sulfate	mg/L	250**	250	250	500		85.2		72.1		92.9
Total Dissolved Solids	mg/L	500**	500	500	500		666		506		402
Appendix IV											
Antimony	ug/L	6	6	6	2.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Arsenic	ug/L	10	10	10	10	< 1.0	1.7	20.0	22.9	101	110
Barium	ug/L	2,000	2,000	2,000	1,200	99.7	98.9	116	109	244	166
Beryllium	ug/L	4	4	4	25	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Cadmium	ug/L	5	5	5	2.5	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
Chromium	ug/L	100	100	100	11	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Cobalt	ug/L	NC	40	100	100	< 15.0	< 15.0	< 15.0	< 15.0	< 15.0	< 15.0
Fluoride	ug/L	4,000	NC	NC	NC	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000
Lead	ug/L	NC	4	4	14	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Lithium	ug/L	NC	170	350	440	35	31	71	61	34	26
Mercury	ug/L	2	2	2	0.20#	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
Molybdenum	ug/L	NC	73	210	120	< 5.0	< 5.0	12.0	15.7	< 5.0	< 5.0
Radium-226	pCi/L	NC	NC	NC	NC	< 0.807	< 0.867	< 0.847	< 0.676	< 0.908	< 0.745
Radium-226/228	pCi/L	5	NC	NC	NC	< 1.72	< 1.71	< 1.74	< 1.50	< 1.79	< 1.83
Radium-228	pCi/L	NC	NC	NC	NC	< 0.910	< 0.842	1.03	< 0.826	< 0.884	< 1.08
Selenium	ug/L	50	50	50	5	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Thallium	ug/L	2	2	2	2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 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 hardness of 258 mg CaCO3/L (average of SW-01 [Lake Huron] and SW-02 [Saginaw River] collected in April 2018) per footnote {G} of Michigan Part 201 criteria tables. Chromium GSI criterion based on hexavalent chromium per footnote {H}. GSI criterion is protective for surface water used as a drinking water source as described in footnote {X}. GSI criterion for chloride is 50 mg/L when the discharge is to the Great Lakes or connecting waters per footnote {FF}
- # 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.

Figures











Appendix A Monitoring Well Records

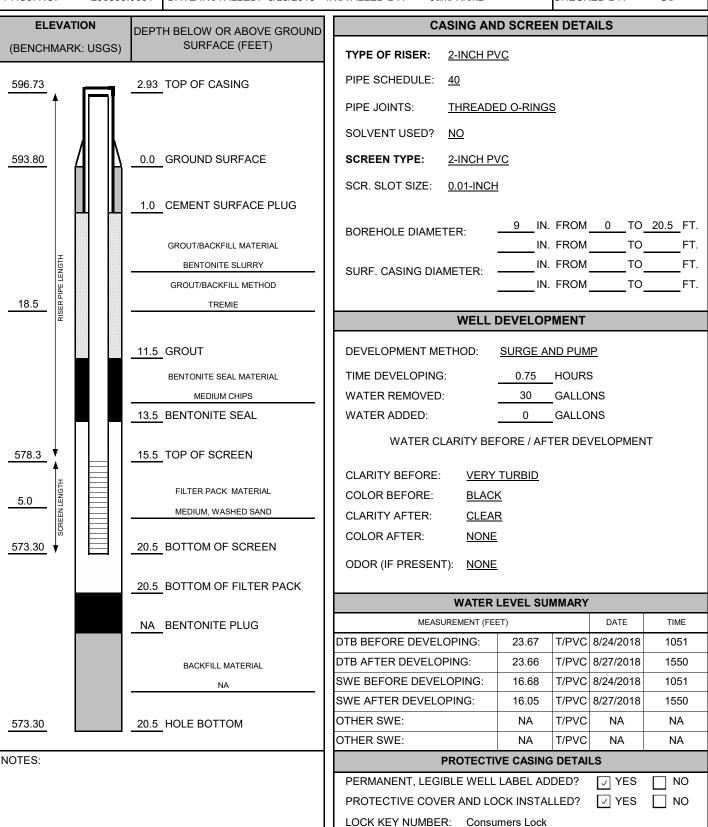
						WELL CONS	TRUCTION I	LOG							
	7	T	R (WE	LL N	O. J	CW.	-MW	/-18001	
														1 of 1	
Facility	//Projed						Date Drilling Sta	ırted:	Date	Drilling	Comple	ted:	Proj	ect Numbe	r:
	(CEC	Wead	dock: JCW	HMP Well	Installation	8/23/1				3/18			0805.00	01.0000
Drilling	Firm:				Drilling Meth	od:	Surface Elev. (ft) TOC	Elevation	on (ft)	Total I	Depth	(ft bgs	Borehol	e Dia. (in)
	St	earns	Drilli	ng	Holl	ow Stem Auger	593.8		596.7	3		20.5	5		9
Boring		on: No	orth side	e of the road th	nat borders the	e discharge channel.	Personnel				Drilling	g Equi	pment	:	
		Ac	djacent	to JCW-OW-1	8001.		Logged By - Ja Driller - Mike H						CN	ЛЕ-55	
Civil T	own/Ci	ty/or Vi	llage:	County:		State:	Water Level Ob While Drilling:		: :e/Time	8/23/	18 10:0	7 (Z De	epth (ft bgs)	12.00
	Esse	xville		Bay C	County	Michigan	After Drilling:		e/Time					epth (ft bgs)	
SAM	PLE														
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			LITHOLOGI DESCRIPTIO				NSCS	GRAPHIC LOG	WELL DIAGRAM		COMME	ENTS
1 SS	80	4 4 4	-			ND mostly medium nd, light brownish g			se.	GW	0 0				
		6	-	CLAY W	VITH SAND	mostly clay, little f	ine sand, trace	fine		CL	//				
Ø		11	2-	∖gravel, I	low plastici	ty, brown (10YR 5/3	3), dry, medium	stiff to s	tiff. /_	SP					
2 SS	80	8	_			to medium sand, tr	ace medium gra	avel, ver	у /						
SS		7	-			/1), moist, loose.		<i>c</i> :		CL					
- 1		7 5	4-			mostly clay, little f			r:tt						
		5 10	-			ty, brown (10YR 5/3 lium sand, trace fin					/ /				
3 SS	90	15	-			n (10YR 3/2), dry, k				SP					
		14	-	fragmen		1 (1011\ 3/2), dry, ic	lose, trace stag	and coa	ai	0.					
		2	6-			stly clay, some fine	to medium san	d. low			//				
4	400	4	-			0YR 5/3), moist, so		u,		CL					
ss	100	4	_			to medium sand, tr		ium							
		4	8-	gravel, b	brown (10)	'R 4/3), dry, loose.				SP					
		3	-	Change	to no grav	el, brownish yellow	(10YR 6/6) at 8	.0 feet.		0.					
5 SS	80	4 4 6 3	- - 10 —	gravel, I	low plastici	mostly clay, little f ty, dark yellowish b than 0.25 inches th	rown (10YR 4/4), dry, st	- — — - tiff,						
S	100	3 5 5	- - 12-							CL					
. 🛭		1	-	COALA	SH mostly	/ ash, black (10YR	2/1), saturated,	loose.							
7 SS	10	1 1 1 0	- - 14 —	<u> </u>							3		: :		
8 🛭		0	-	1							¥	.	:		
8 SS	100	1	-			nic material, trace	silt, very dark br	own		PT	17.1		:		
		3	16	\(10YR 2	2/2), moist,	soft.	•					. 目	.		
Ø		3	16-			lium sand, dark gra	y (10YR 4/1), sa	aturated	,			Ħ	:		
9 SS	100	5	-	loose.	-	•	•			CVA		::目			
5S	.00	7	-							SW					
		7	18 —									:目			
🛭		0	-										.:		
10 SS	100	3 5	-	CI AY W	/ITH SAND	mostly clay, few to	little fine sand	trace			//		:		
		1	-			avel, low plasticity, g				CL		:: :			
11 0	0	· ·	20 —	stiff.	g. c	, p	, , , , , , , ,	,		-			:		
NR/			-	End of b	ooring at 20	0.5 feet below grou	nd surface.					—			
			-	-											
		1)										•		
Signat	ure:	- 1	1			Firm: TF	RC Environment	al Corpo	oration	1					71-7080
		- V	rol	fun	X	15	40 Eisenhower	Place A	Ann Ar	bor, N	/II 481	80	Fa	x 734-97	71-9022

Signature: TRC Environmental Corporation 1540 Eisenhower Place Ann Arbor, MI 48108 734-971-7080 Fax 734-971-9022



WELL CONSTRUCTION DIAGRAM

PROJ. NAME:	CEC Weadock	WELL ID:	JCW-MW-18001			
PROJ. NO:	290805.0001	DATE INSTALLED: 8/23/2018 INS	ISTALLED BY: Jake Krenz		CHECKED BY:	CS

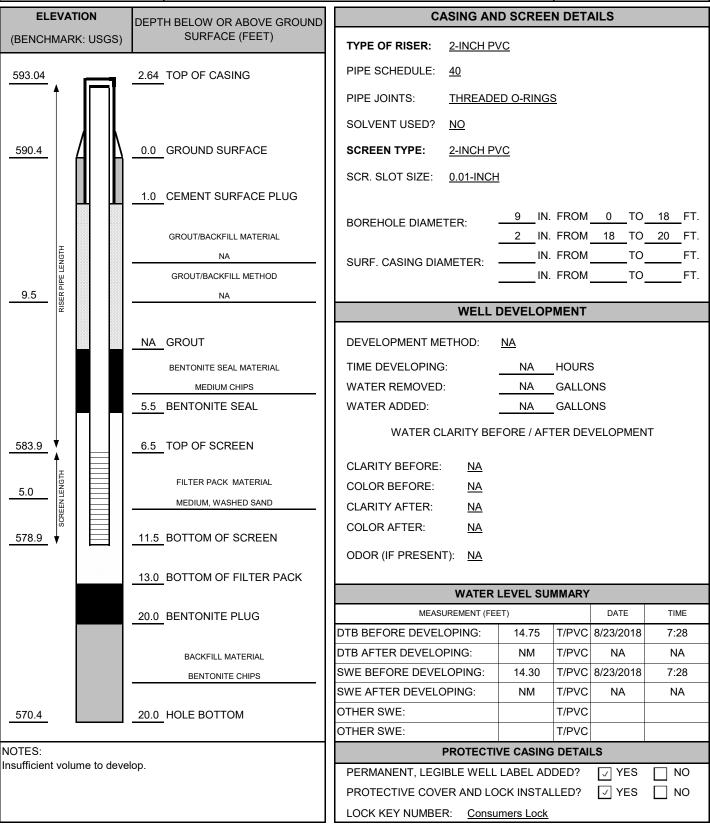


			_				WE	LL CONST	RUCTION LO	G							
			П	R (WEI	LL N	10. J	CW-	MW-	18004	
ŀ		(D :							D + D :::: 01 +		D 1 D		0 1		Page		
-	Facilit	ty/Proje							Date Drilling Started	d:	Date Di	_	-	eted:	1	ct Number	
ŀ	Daillia			Wea	dock: JCW			on	8/22/18	TOOL	-1 4:		2/18	>4b		805.000	
-	Drillin	g Firm:		D :II:		Drilling Meth			Surface Elev. (ft)		Elevation	1 (π)		-	(II bgs)	Borehole	
ŀ	Poring			Drillin	ng ately 400 feet		low Stem		590.4 Personnel	5	93.04			20.0) 9 ipment:		
	DOIII	y Locali	the	e east s	side of the road	d.	outreast co	mer or site on	Logged By - Jake I Driller - Mike Heffe					y Equi		E-55	
İ	Civil T	own/C	ity/or V	illage:	County:		State:		Water Level Observ		/Time	8/22/	/18 11:0	<u> </u>		h (ft bgs)	7.00
ļ		Esse	xville	ı	Bay C	ounty	М	ichigan	After Drilling:				18 14:3		Dept	h (ft bgs)	
ļ	SAMPLE																
AND TYPE AND TYPE RECOVERY (%) BLOW COUNTS DEPTH IN FEET DEPTH IN FEET										nscs	GRAPHICLOG	WELL DIAGRAM	C	OMME	NTS		
	1 SS	50	1 1 2 3	- - - 2-				sand, trace sil ow plasticity, c	t, trace fine grave Iry, stiff.	el, dark		CL					
	2 SS	100	3 4 6 3	- - 4-	CLAYW	TH SAND	Mostly cl	ay, little fine s	and, trace fine to								
CORP_INCHES.GDT 290805.0001.0000 12/13/18	3 SS	80	2 3 5	- - 6-	medium medium		v to mediu	ım plasticity, t	orown (10YR 4/3), mois		CL					
S.GDT 2908	4 SS	100	3 3 4	- - 8-		to saturate			nedium sand, trad	e fine							
CORP_INCHE	5 SS	90	3 3 4	- - 10-	to mediu moist, m Change	ım gravel, ledium stiff to soft, no	low to me , plant roo plant roo	dium plasticity ots present. ts present at to nt at 9.25 fee	y, brown (10YR 4 8.75 feet.	1/3),		CL					
	6 SS	100	3 4 4	- - - 12-	Change CLAY W to mediu	to moist, s	stiff, no pla Mostly cl low to me	ant roots pres ay, few to little	ent at 9.5 feet. e fine sand, trace y, brown (10YR 4		_/	<u> </u>					
IMP REVISIO	7 SS	100	2 4 5 6	- - - 14	Change	to soft to r	medium st	tiff at 13.0 fee				CL					
01 WEADOCK H	8 SS	100	3 5 4 6	- - 16	gravel, lo stiff to st	ow plasticit iff.	y, yellowis	sh brown (10)	ne sand, trace fin /R 5/4), moist, m	ie edium							
OG 290805.00	9 SS	100	5 11 25 33	- - - 18	Change	to dry, ver	y sun ac n	o.u ieei.				CL					
SOIL BORING WELL CONSTRUCTION LOG 290805.0001 WEADOCK HMP REVISIONS.GPJ TRC	10 SS	100	13 25 37	- - - 20 —	End of b	oring at 20) () feet he	elow ground s	surface								
NG WELL COI				_ _ _		Jing at 20	1001 De	Jon ground s									
SOIL BORI,	Signature: Firm: TRC Environmental Corporation 734.971.7080 1540 Eisenhower Place Ann Arbor, MI 48108 Fax 734.971.9022																



WELL CONSTRUCTION DIAGRAM

PROJ. NAME:	CEC Weadock	: JCW HMP Well Installation	WELL ID:	JCW-MW-18004			
PROJ. NO:	290805.0001	DATE INSTALLED: 8/22/2018 IN	ISTALLED BY:	Jake Krenz		CHECKED BY:	CS

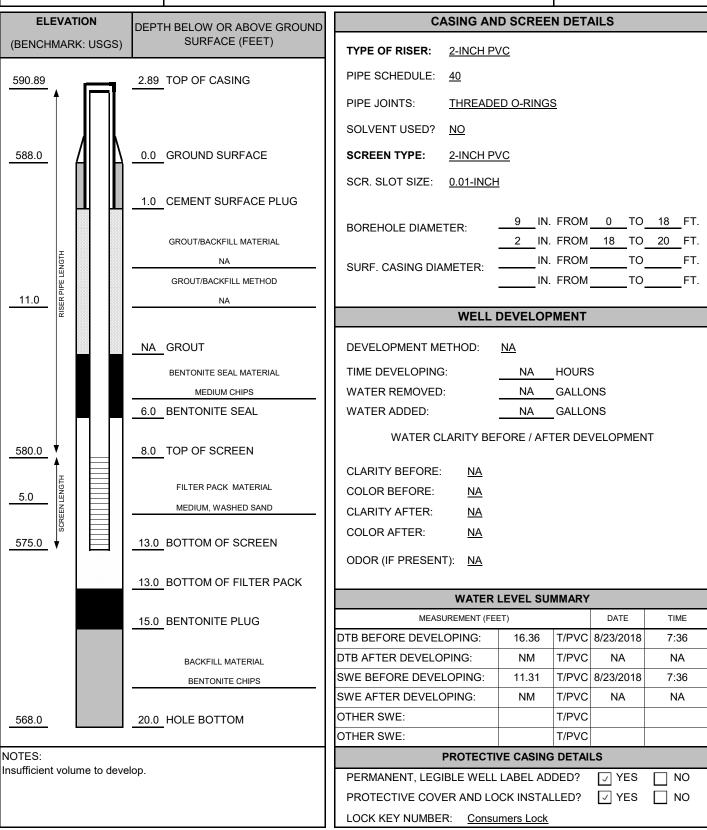


		_				WELL CONST	RUCTION LO	G				
			R						WELL	NO. J	CW-	-MW-18005
Fac	cility/Pro	ject Nar	ne:				Date Drilling Started:	 :	Date Drill	ing Compl	eted:	Page 1 of 1 Project Number:
	.,o	•		dock: JCW	HMP Wel	I Installation	8/21/18			3/21/18		290805.0001.0000
Dri	lling Firn				Drilling Meth		Surface Elev. (ft)	TOC	Elevation (Depth	(ft bgs) Borehole Dia. (in)
		Stearn				low Stem Auger	588.0	{	590.89		9	
Во	ring Loca	ation: A	Adjacen	t to MW-20, on	the south side	e of the road.	Personnel Logged By - Jake K	(renz		Drillir	ng Equi	pment:
					nan				CME-55			
Civ	ril Town/	City/or \	/illage:	County:		State:	Water Level Observa		e/Time _8	/21/18 15:1	7 08	Depth (ft bgs) 9.50 Depth (ft bgs) 9.50
\vdash		exville	e	Bay C	County	Michigan	After Drilling:		e/Time _8		36	Depth (ft bgs) 8.31
S	AMPLE											
NUMBER	AND LYPE RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			LITHOLOGIC DESCRIPTION	ı			USCS GRAPHIC LOG	WELL DIAGRAM	COMMENTS
1		1	+	TOPSO	IL mostly	fine sand, some organ	nic material, very	dark	I .		1/1	
1 SS	100	2			OYR 3/1), d	Iry, loose, roots preser	nt.			SP SP		
ISS		4 5		SAND loose.	mostly fine	to medium sand, brow	wn (10YR 4/3), di	ry,	, ↓	c ////		
\vdash		2	2-	SANDV		mostly fine to mediu	m sand, few clay	, ,	-1/1	- (9/6)	Ť	
2 SS	50	4				0YR 3/2), dry, soft.	, dad, mardah har					
		6	,		mostry fine 3/2), dry, lo	to medium sand, very	y dark grayish bro	own	,	SP .		
		2	4-	Change	to few fine	e to medium gravel, ve	ery dark brown (1	0YR		"		
28 88 €	50	2 2		2/2) at 3								
12/5,		3	6-			(10YR 4/4) at 5.25 fee estly clay, little to some	///					
CORP.GDT 290805.0001.0000 12/5/18	80	3 2				medium stiff, trace roo		Jui IU,				
)805.0		3 2	8-	PEAT r ▼loose.	nostly pea	t, few fine sand, black	(10YR 2/1), mois	st,	F	Υ		
35 Z9C SS Z9C SS Z9C	50	3 2			-	dium sand, gray (10YF	•		/ s	SP		
C CORP.		3	10-	SANDY gravel, saturate	low to med	stly clay, little to some lium plasticity, dark gr	e fine sand, trace ay (10YR 4/1),	fine				
SS SS	100) 3 6				t 11.0 feet.						:
S.GF		10	12-	4						, //		·.
NOISIN 7	100	8		Change	to few to l	little fine sand, very st	iff at 12.5 feet.			l //		
SS E		11 15		+								
X ₹		5	14-	Change	to few to	little silt, dry at 14.0 fe	et.					
8 SS	100	10		+ -sii +v-	CLAV mos	tly clay, few to little sil	t trace to few fine		+		7	
×E KEY		21	10			y, dark gray (10YR 4/1		C				
.000		9	16-]			-					
9 SS SS	100) 17		+					_	:L-		
)G 		28	18-]			10.05			ī //		
S 10 10 11 Change to very dark gray (10 YR 3/1) at 18.0 feet.												
SS SS	100	15		1								
STRL	M	23	20-	End of I	horing at 2	0.0 feet below ground	surface			- 1/1		
OS N					ooming at 2	o.o ieet below ground	Suriace.					
WELL]								
Sig	nature:		11 1				Environmental C					734-971-7080
SOI			pol	fun	1	1540	Eisenhower Pla	ce A	nn Arbo	r, MI 48	108	Fax 734-971-9022



WELL CONSTRUCTION DIAGRAM

PROJ. NAME:	CEC Weadock: JCW HMP Well Installation			WELL ID:	JCW-MW-18005	
PROJ. NO:	290805.0001	DATE INSTALLED: 8/21/2018 INST	STALLED BY: Jake Krenz		CHECKED BY:	CS

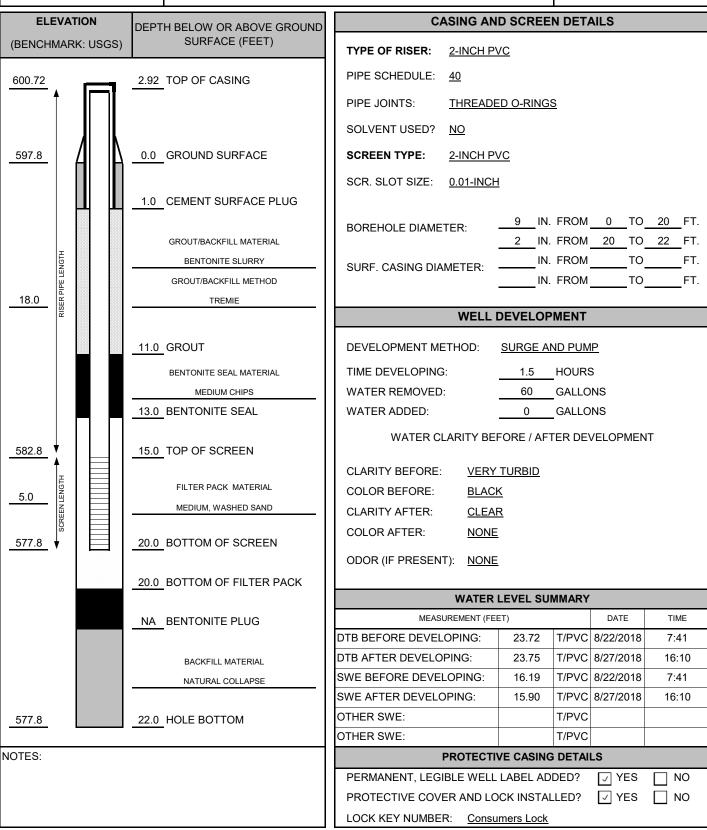


	WELL CONSTRUCTION LOG WELL NO. JCW-MW-18006														
)		代 (WE	LL I	NO. J	ICW-	-MW-18006	
L														Page 1 of 1	
F	acilit	y/Proje						Date Drilling Started	d:	Date D		Compl	eted:	Project Numbe	
Ļ				Wea	dock: JCW		Installation	8/20/18	1.00	-1		0/18	D	290805.000	
١	rillin	g Firm:		D :II:		Drilling Meth		Surface Elev. (ft)		Elevatio	` ,	lotal		(ft bgs) Borehole	
ŀ	Rorino		earns				ow Stem Auger of the slurry wall, southwest	597.8 Personnel	6	00.72	<u>'</u>	Drillin	22.0	pment:	9
ľ	,011116	g Loodii	of	OW-6	1.	most scottom c	or the starry wan, southwest	Logged By - Jake I					g Equi		
L	Nivil T	own/Ci	itulor Vi	illaga:	County:		State:	Driller - Mike Heffe						CME-55	
1	>IVII I		-	ıııaye.				While Drilling:	Date			/18 14:3		Depth (ft bgs)	
F	044	Esse	xville		Bay C	County	Michigan	After Drilling:	Date	/Time	8/22	2/18 07:4	<u> 11_</u> ¥	Depth (ft bgs)	_13.29_
┢	SAM	PLE													
		(9)	S	-									Σ		
ı		%) X	UNT				LITHOLOGIC DESCRIPTION	ı				007	3RA	COMME	NTS
100	Kr	VER	00	Z T			DESCINI TION					일	DIA		
	AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET							nscs	GRAPHICLOG	WELL DIAGRAM		
Ľ	₹ //	₩.	1B 1		COAL A	SH mooth	coal ash, trace to few	fine sand block (10VD		Ď	Ü		<u> </u>	
	1	100	5	_	2/1), dry		coai asii, liace lo iew	mie saliu, Dlack (IUIK						
^s	SS 100 10 10 10 10 10 10 10 10 10 10 10 10														
上			7	-	1										
S	s //	100	5 7	-	<u> </u>							\leq			
<u></u>	- 19		6	_											
2/13/	s s	75	2	5-								\preceq			
8 8	s	73	1 3	3											
91.0 -			1	-								\leq			
55.00	s s	100	2 1	-											
5908C			2	_								\mathbf{X}			
Ĭ,	5	400	0												
S S	s s	100	1 1	_	Change	to moist to	wet at 9.0 feet.					\mathbf{X}			
CORP_INCHES.GDT 290805.0001.0000 12/13/18			1	10 —											
S S	s /	100	1 1	-								\mathbf{X}			
			1	_	Change	to wet at 1	1.5 feet.								
띩.	, 🛭		1 0		\square							\preceq			
S.GF	s s	80	0	_	▼ Change	to saturate	ed at 13.0 feet.								
NOIS			1	-								\leq			
REVI	s /	100	0 1	15 —											
			0	_								X		1	
) S	, []		1 0												
Ý S	s	85	0	-	1							玉	:目:	1	
<u>}</u>			0	-											
1 02:00	0 S	10	1	-			um to coarse sand, tra	ace fine gravel, da	ark		SW	17.7.		1	
2908			1	20 —			aturated, loose. trace fine sand, trace	medium graval		_/					
90 1	1		3	20	medium	n plasticity, k	prown (10YR 5/3), mo	ist, medium stiff.			CL			•	
SOIL BORING WELL CONSTRUCTION LOG 290805,0001 WEADOCK HMP REVISIONS.GPJ TRC	1 S	100	4	-	1	-									
EUC!			3	-	End of b	ooring at 22	2.0 feet below ground	surface.				Y. :/::/		<u>:</u> 	
NST				-		5	3								
L CC				_											
WEL															
AING PING			^	1								-			
S Le	Signa	ture:		1			Firm: TRC	Environmental C	orpora	ation					1.7080
<u>S</u>			1/2	rol	fun	X	1540	Eisenhower Place	ce An	n Arb	or, N	11 4810)8	Fax 734.97	1.9022

TRC Environmental Corporation 1540 Eisenhower Place Ann Arbor, MI 48108 734.971.7080 Fax 734.971.9022 Firm: Signature:



PROJ. NAME:	CEC Weadock	: JCW HMP Well Installation	WELL ID:	JCW-MW-18006		
PROJ. NO:	290805.0001	DATE INSTALLED: 8/20/2018 INS	STALLED BY: Jake Krenz		CHECKED BY:	CS

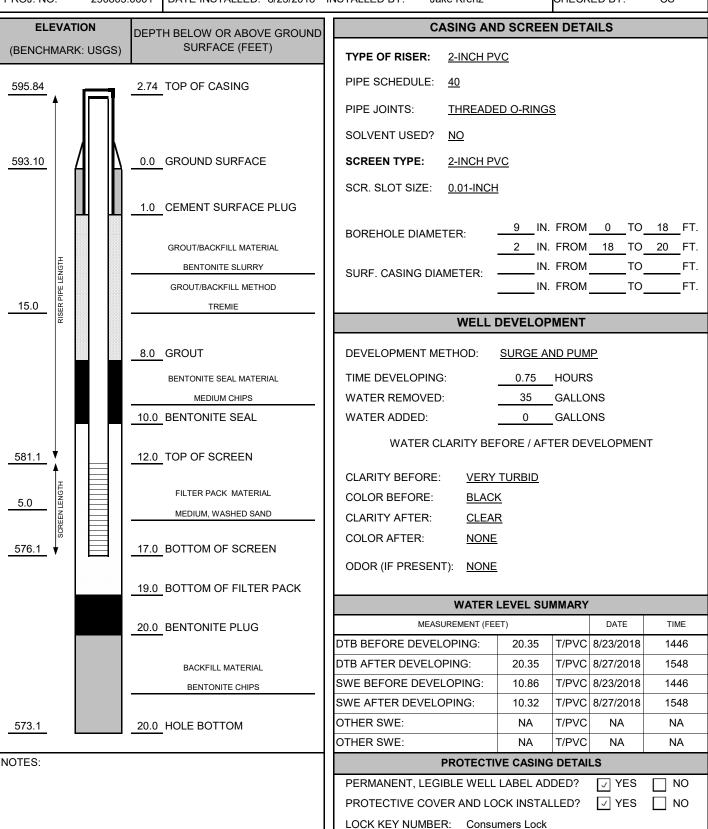


						WELL CONS	TRUC	TION LO	G							
		T	R (WEL	L N	O. J	CW-		-18001	
Facility	y/Projed	ct Name	e:				Date D	rilling Started	d:	Date D	rilling (Comple	ted:		ect Numbe	r:
		CFC	Wead	dock: JCW	HMP Well	Installation		8/23/18			8/23	3/18		290	0805.00	01.0000
Drilling		0_0		200111 0011	Drilling Metho		Surfac	e Elev. (ft)	TOCE	Elevation			Depth	(ft bgs)	_	e Dia. (in)
`	•	earns	Drilli	na		ow Stem Auger		593.1		595.84	` '		20.0			9
Boring						e discharge channel.	Persor			700.01		Drilling		pment:		
		Ac	djacent	to JCW-MW-1		, aloo la go o lao	Logge	ed By - Jake I · - Mike Heffe				2	, _qu	-	IE-55	
Civil T	own/Ci	ty/or Vi	llage:	County:		State:	I	Level Observ Drilling:		/Time	8/23/	18 09:0	7 (Z Der	oth (ft bgs)	7.50
		xville	1	Bay C	County	Michigan	I	Drilling:		/Time _			7 1		oth (ft bgs)	
SAM	PLE															
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			LITHOLOGI DESCRIPTIO					nscs	GRAPHIC LOG	WELL DIAGRAM		COMME	ENTS
		_		SAND W	VITH GRAV	/EL mostly medium	sand, fe	w to little	fine		CD.	, "0	7			
		3	-	to mediu	um to grave	el, black (10YR 2/1)), dry, loc	se.			SP	9 9	1	1		
1 SS	100	4	-	sand, tra	ace to few	mostly clay, few to fine gravel, low plas edium stiff to stiff.	little fine sticity, ve	e to mediu ery dark gr	um ay		CL					
		5	2-			/EL mostly medium black (10YR 2/1), c			fine			, 000				
		5 4	-								SP					
2 SS	80	3	-	sand, tra	ace to few	mostly clay, few to fine gravel, low plase edium stiff to stiff.	little fine sticity, ve	e to mediu ry dark gr	ım ay		CL					
		1	4-	SAND r	nostly fine	to medium sand, tr./1), dry, loose.	ace fine	gravel, ve	ry		SP					
3 SS	60	1	-	Change	to dark gra	ay (10YR 4/1) at 5.0) feet.									
		1	6-			mostly silt, little to s sticity, soft.	ome pea	it, black (1	10YR		ML					
		1	_			to medium sand, tray (10YR 3/1), dry		to medium	n		SP					
4 SS	100	1	-			ash, very dark gra		3/1), wet,	loose.							
		1	8-	Change	to saturate	ed, slag fragments _l	oresent a	it 7.5 feet.								
5 SS	80	0	-									3				
		0	-			ittle clay present at										
6		1	10	CLAYE) plasticity	Y SAND m y, dark gra	ostly fine sand, little y (10YR 4/1), satura	to some	clay, low	 '		sc					
4 SS 5 SS 6 SS Signat	80	0	-			mostly clay, little f h brown (10YR 4/2)			e		CL					
			\	1								//	·1 1	•1		
Signat	ure:		rol	Um				nmental (hower Pla			or, N	/II 481	08	Fax		71-7080 71-9022

	_	TI	₹(WELL CONSTRUCTION LOG W	ELL N	10. J		OW-18001 Page 2 of 2
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET	LITHOLOGIC DESCRIPTION	nscs	GRAPHIC LOG	WELL DIAGRAM	COMMENTS
7 SS 1	100	1 0 0 0	- - 14 —	COAL ASH mostly ash, very dark gray (10YR 3/1), saturated, loose.				
33	100	2 4 1 2 2	16 —	PEAT mostly organic material, trace silt, very dark brown (10YR 2/2), moist, soft. SAND mostly fine to medium sand, dark gray (10YR 4/1), saturated, loose SANDY CLAY mostly clay, little to some fine to medium sand,	SP			
10 1 SS 1	100	2 3 6 9	18 —	trace medium gravel, low plasticity, gray (10YR 5/1), soft to medium stiff, moist to saturated. Change to moist, stiff at 19.0 feet. Change to very stiff at 19.5 feet.	CL			
		<u></u>	20	End of boring at 20.0 feet.		<i>(:::<u>/</u>:::</i> ₇		
			- - 24 —					
			- 26 —					
			-					



PROJ. NAME:	CEC Weadock	: JCW HMP Well Installation	WELL ID:	JCW-OW-18001		
PROJ. NO:	290805.0001	DATE INSTALLED: 8/23/2018 INS	STALLED BY: Jake Krenz		CHECKED BY:	CS

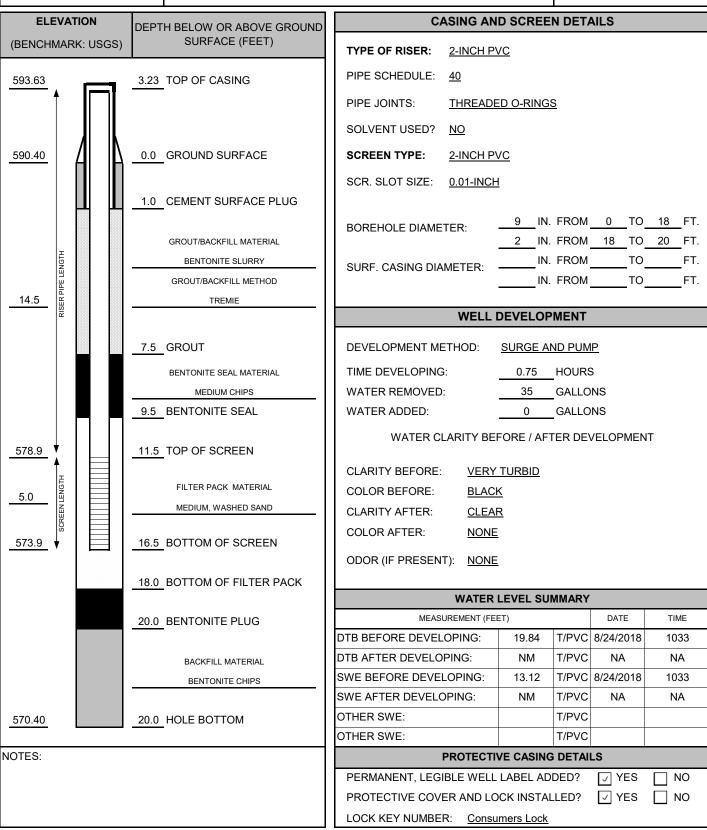


	WELL CONSTRUCTION LOG WELL NO. JCW-0W-18002															
			T	7							WFI	LN	ור. ס	:W-	OW-	18002
												_ '*	J. 00		Page 1	
Fa	acility	/Projec	t Name	e:					Date Drilling Started	d:	Date Dri	illing (Complete	ed:		t Number:
	,	-			dock: .ICW	HMP Well	Installati	on	8/23/18			·	3/18		1 1	305.0001.000
Dr	rillina	Firm:	3_0	., ca	, JOIN. 00 VV	Drilling Metho		- 11	Surface Elev. (ft)	TOC	 Elevation		Total D	epth (Borehole Dia. (in)
	9		earns	Drilli	na	"	ow Stem	Auger	590.4		593.63	(,		20.0	`	9
Bo	orina					the south side			Personnel	,	33.03		Drilling			9
	J9		,	Juoo	55, 5		0. 0.0 .000.		Logged By - Jake h	Krenz				_90.6		
					1		T		Driller - Mike Heffe						CME	E-55
Ci	vil To	own/Cit	ty/or Vil	lage:	County:		State:		Water Level Observ While Drilling:		/Time _8	81231	18 08-15		7 Dent	h (ft bgs) <u>12.00</u>
		Esse	xville		Bay C	County	M	ichigan	After Drilling:		/Time				Dept	h (ft bgs) 10.12
-	SAMPLE															
\vdash																
				_										5		
		%	ŠĽ	Ë				THOLOGIC					90	DIAGRAM		OMMENTS
<u>~</u>	NUMBER AND TYPE RECOVERY (%) BLOW COUNTS DEPTH IN FEET DESCRIBLION												C	ΪĀĠ		0.0
4BE	_	RECOVERY (%)	Ņ	DEPTH IN FEET								ઇ	GRAPHIC LOG	L D		
5	AN	REC	BLOW	DEP								nscs	3R/	WELL		
广	H	_	3		SANDY	CLAY mos	stly clav	little to some	fine to medium	sand		CL	7/	Í.		
1		100	5	-					6), dry, medium s		/			, [,		
SS		100	5	_	SAND r	nostly med	lium sand	d, few mediu	m gravel, trace c		_	SP			1	
\perp	1		6	2-				YR 3/2), dry							1	
			4						fine to medium							
2 SS		100	5 7	-	moist, s		m gravei	, low plasticii	ty, brown (10YR	5/3),						
			10	-	1110131, 3	uii.						CL				
\vdash	Ħ		5	4 —								0_				
28 28 28		100	5													
8S	3	100	12	_												
12/	1		20	6-					fine to medium	/O\ -I						
CORP.GDT 290805.0001.0000 12/5/18			6 8	-	gravei, t loose.	race coal a	ısıı. very	uark grayish	brown (10YR 3/	∠), ar	у,					
9 4 9 SS		100	5	-		to no grav	el, no as	h, strong bro	wn (7.5YR 5/6),	at 6.0		SP				
22.00			2	-	feet.	· ·			,			0.	l Y			
806	И		2	8	Change	to mostly i	medium :	sand, trace fi	ne to medium gr	ravel,						
5 SS		90	2	_				at 6.5 feet.	6							
<u>0</u> 25			3 2	-					ttle fine sand, st, medium stiff.			CL			1	
8	И		1	10 —	SAND r	nostly med	lium sand	d vellowish h	rown (10YR 5/6))	_/					
			1	-	moist to	wet, loose		a, yellowlon a	70W11 (10111 0/0)	/,		SP		:		
SS		100	1	_		to saturate		5 feet.				J 1			}	
S.GF	Ø		2	12 —	<u> </u>	= 1747 2747					↓			目	}	
NO.			1	-				it, little fine s	and, black (10YI	K	,	ML		目:		
SE AS		100	3 7	-		turated, loo		ry dark gray	(10YR 3/1), satu	ırated						
٩ ١			4	-	loose.	nosuy IIII C	Janu, VE	iy dair glay	(1011 3/1), Salu	ıı al C U,	'			目:		
⋚	Ħ		3	14 —		to mostly i	medium	sand, dark gr	ay (10YR 4/1) at	t 13.0		00		目		
8 8 8 8 8		100	4	_	feet.	•		_	·			SP				
SS		100	4	_												
5 - -	H		5 3	16 —										1	1	
5.00			5	-	CLAY n	nostly clay	trace fin	e sand trace	e fine gravel, me	dium			77		:	
90802 SS		100	8	-					medium stiff to							
Ö C			8	18—		- - `	• •	·						<u> </u>		
일			3	-								CL				
NO 10		100	6	-												
	, [9 14	-												
	<u> </u>		1**	20 —	End of h	ooring at 20	0.0 feet h	elow ground	surface.				1			
8				-	1	J === ==		. 0								
SOIL BORING WELL CONSTRUCTION LOG 290805,0001 WEADOCK HMP REVISIONS,GPJ TRC QS % & % & % & % & % & % & % & % & % & % &				_												
کٍٰل																
PR_			Λ		\sim											
Si Si	gnatı	ure:	- 11	, 1.	. (//.	/			Environmental (۰. ۱	AL 4044	10		734-971-7080
SC			\h	roc	Jun	Z		1540	Eisenhower Pla	ice A	ıın Arbo	۲, ۱۷ <u>.</u>	<u> </u>	Jα	<u>rax</u>	734-971-9022

TRC Environmental Corporation 1540 Eisenhower Place Ann Arbor, MI 48108 Signature: 734-971-7080 Fax 734-971-9022



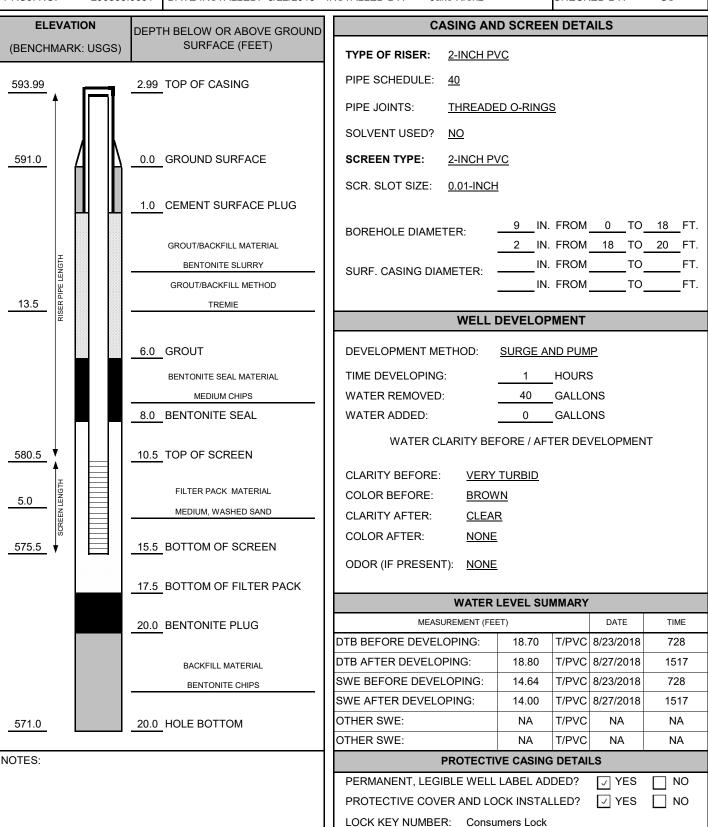
PROJ. NAME:	CEC Weadock	: JCW HMP Well Installation			WELL ID:	JCW-OW-18002	
PROJ. NO:	290805.0001	DATE INSTALLED: 8/23/2018	INSTALLED BY:	Jake Krenz		CHECKED BY:	CS



Г	WELL CONSTRUCTION LOG													
	C	T	7							WELL	NO.	JCW-	- OW-1800 Page 1 of 1	3
Fa	cility/Proje	ct Name	э:					Date Drilling Started	l:	Date Drilli	ng Comp	leted:	Project Number	er:
		CEC '	Wead	dock: JCW	HMP Well	Installati	ion	8/22/18			/22/18		290805.00	001.0000
Dr	illing Firm:				Drilling Meth			Surface Elev. (ft)		Elevation (ft) Tota	l Depth		ole Dia. (in)
L		earns				low Stem		591.0	5	593.99	· · · ·	20.0		9
Bo	oring Locati	on: No	ortneas	t corner of site,	, across the ro	ad from MW	1-52.	Personnel Logged By - Jake k Driller - Mike Heffel			Drilli	ng Equip	CME-55	
Civ	vil Town/Ci	ty/or Vil	lage:	County:		State:		Water Level Observ While Drilling:		/Time <u>8/2</u>	22/10 15:	<u>00</u> Z	Z Depth (ft bgs) 14.00
	Esse	xville		Bay C	County	Mi	ichigan	After Drilling:			23/18 07:	_	Depth (it bgs Depth (ft bgs	
S	SAMPLE													
NUMBER	LITHOLOGIC DESCRIPTION REGULATION REPLAND REP										GRAPHIC LOG	WELL DIAGRAM	СОММ	ENTS
1	7 GRAVEL WITH SAND mostly medium to coarse gravel, little													
2 SS	80	7 6 5	2 - -	medium	to coarse dium stiff.	gravel, lo	ow plasticity,	fine sand, few dark brown (10Y sh brown (10YR), C	- 1/1			
3 SS	80	7 2 2 3 3	4 — - - - 6 —	dry, loos Change	3/2),	SI								
CORP.GDT 290805.0001.0000 12/5/18		4 9 6 2 2	8 - 8 -		·			/R 5/3), moist, lo		SI	-			
5 SS	100	2	_					d, trace fine grav		C	- ///	<u> </u>		
	100	3 2 2	10 -	SAND r dark gra	mostly med ay (10YR 4	dium sand /1), moist	d, trace medi t, loose.	, moist, medium um to coarse gra	avel,	_ Ĵ				
S.GF		3	12 -							c	- ///	7目		
ADOCK HMP REVISION SS 8	low plasticity, very dark gray (10YR 3/1), moist, medium stiff. SAND mostly medium sand, trace fine gravel, very dark gray (10YR 4/1), wet, loose. Change to saturated at 14.0 feet.									SI				
0G 290805.0001 WE	CLAY WITH SAND mostly clay, few to little fine to medium sand, trace fine gravel, low to medium plasticity, dark gray (10YR 4/1), moist, medium stiff.									С				
SOIL BORING WELL CONSTRUCTION LOG 290805,0001 WEADOCK HMP REVISIONS,GPJ TRC SQI SS 6 SS 8 SS 1 SS 9	100	3 8 11 15	16 - - 20 - -	End of t	poring at 20	0.0 feet b	elow ground	surface.						
SOIL BORING \	Firm: TRC Environmental Corporation 734-971-7080 1540 Eisenhower Place Ann Arbor, MI 48108 Fax 734-971-9022													



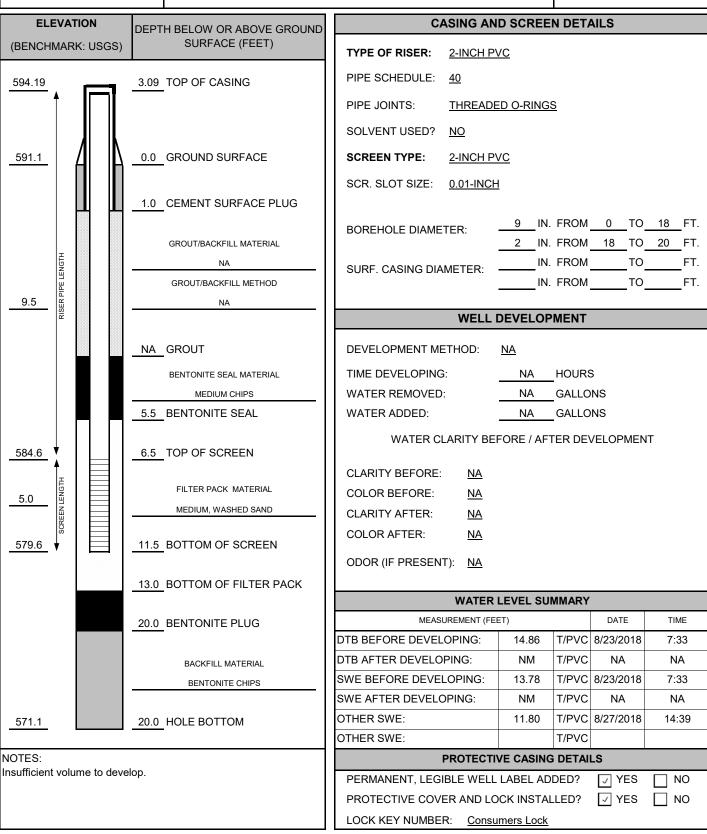
PROJ. NAME:	CEC Weadock	: JCW HMP Well Installation	WELL ID:	JCW-OW-18003			
PROJ. NO:	290805.0001	DATE INSTALLED: 8/22/2018	INSTALLED BY:	Jake Krenz		CHECKED BY:	CS



WELL CONSTRUCTION LOG WELL NO. JCW-OW-18004																
		2	1	~(WEI	LL N	10. J	CW-		
Fa	cility	/Projec	ct Name	e:					Date Drilling Starte	ed:	Date D	Orilling	Comple	ted:	Page 1 o	
	,	•			dock: JCW	HMP Wel	I Installatio	n	8/22/18				2/18		'	5.0001.0000
Dr	illing	Firm:				Drilling Meth			Surface Elev. (ft)		Elevatio	. ,	Total		`	orehole Dia. (in)
	rin-		earns				llow Stem A		591.1		594.19	9	Deilli	20.0		9
BC	oring	Location	on: Ap we	proximest side	of the road.	north of the so	outneast corne	r of site on the	Personnel Logged By - Jake Driller - Mike Heff				Drilling	g Equip	oment: CME-	55
Ci	vil To	own/Cit	ty/or Vil	llage:	County:		State:		Water Level Obser While Drilling:		e/Time				Depth (ft bas)
L			xville		Bay C	County	Mic	higan	After Drilling:		e/Time	8/23/	18 07:3	<u>3</u>		ft bgs) <u>10.78</u>
F	SAMPLE															
JUMBER	LITHOLOGIC DESCRIPTION BUTCH STREET											nscs	GRAPHIC LOG	WELL DIAGRAM	CC	MMENTS
F			3		CLAY n	nostly clay	, trace to fe	ew fine sand	d, trace silt, low	/			777	> 		
1 SS		60	5	-	plasticity	y, gráyish ĺ	brown (10Y	'R 5/2), dry	medium stiff.			CL				
ا			10 8	_	medium	n sand, gra	ıy (10YR 5/	1), dry, loos				GP	0 /			
			5 5	2-	CLAY n	nostly clay	, trace to fe	ew fine sand	d, trace gravel, pist, medium sti							
2 SS		50	5	-	i ilieuluili	ι μιασιισίτу,	, DIOWII (10	11X 4 /3), IIIC	nat, medidili Sli	iii iU S(JIL.					
\vdash	8		5 2	4-	Change	to soft at	4.0 feet be	low ground	surface.			CL				
2 SS SS		50	2	-				J								
12/5/1			2 2	6-	L										•	
0001 4 SS		75	3 4 5	-	trace fin dry, stiff	ne gravel, l	mostly classicit	ay, little fine y, dark gray	sand, trace sil	it, YR 4/2),				· ·	
CORP.GDT 290805.0001.0000 12/5/18		100	6 3 3 4	8- -	Change feet.	to low to	medium pla	asticity, moi	st, medium stiff	f at 8.0)				·	
P.P.G			5	10 –												
ပ္ကုိ ္င			2	- 10	▼											
SS SS		100	2	-	_									目		
NS.G	H		2	12-												
OS TANGED TO SERVICE S		100	2 4	-								CL				
APR.			5	- 14 	CI.		1:441 - C		.							
8 QÇ		400	3 4	-	Change	to rew to l	little fine sa	ind at 14.0 f	eet.							
WEADOC SS		100	6	-												
100	H		9	16-	Change	to stiff at	16.0 feet.									
9 SS SS		100	5 8	_												
29 29			10	- 18 –												
의 N 10			6 12	-												
SS		100	22	-	Change	to dry at 1	19.0 feet.									
SOIL BORING WELL CONSTRUCTION LOG 290805.0001 WEADOCK HMP REVISIONS.GPJ TRC SQ SS S	<u> </u>		- 51	20 — -	End of b	poring at 2	0.0 feet.						1: /: :: /:			
WELL C				-												
ا لگ																
Sign Sign	gnatı	ıre:		rol					Environmental				AL 404	00		34-971-7080
SC			1/2	rov	Jun	X		1540	Eisenhower Pl	ace A	nn Ark	or, N	vii 481	UB	rax 7	34-971-9022



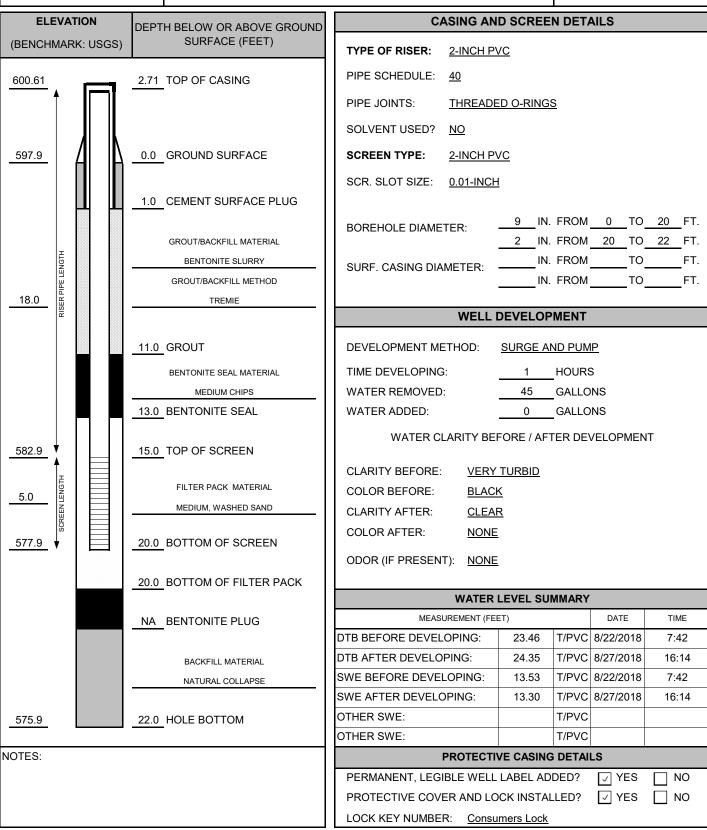
PROJ. NAME:	CEC Weadock	: JCW HMP Well Installation		WELL ID:	JCW-OW-18004	
PROJ. NO:	290805.0001	DATE INSTALLED: 8/22/2018 INSTALLED BY:	Jake Krenz		CHECKED BY:	CS



	WELL CONSTRUCTION LOG WELL NO. JCW-OW-18006												
	C	П	7							WELL N	10. J		OW-18006 Page 1 of 1
Facili	ity/Projed	ct Name	э:					Date Drilling Started	i:	Date Drilling	Complet		Project Number:
		CEC	Wead	dock: JCW			on	8/20/18			1/18		290805.0001.0000
Drillir	ng Firm:				Drilling Meth			Surface Elev. (ft)		Elevation (ft)		Depth (
Davis		earns				ow Stem		597.9	6	800.61		22.0	9
Borin	ig Locati		N-61.	the westernmo	St section of tr	ie siurry waii,	southwest of	Personnel Logged By - Jake I Driller - Mike Heffe			Drilling	g Equip	CME-55
Civil	Town/Ci	ty/or Vil	lage:	County:		State:		Water Level Observ While Drilling:		/Time 9/20	/10 16:15	- V	7 Donth (ft bgg) 6.50
	Esse	xville		Bay C	County	Mid	chigan	After Drilling:		/Time <u>8/20/</u> /Time <u>8/23/</u>	/18 07:42		
SAI	MPLE												
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			LIT DE:			nscs	GRAPHIC LOG	WELL DIAGRAM	COMMENTS	
		2					, trace to fev	v fine sand, blac	k		4	7	
1 SS 2 SS	60 50	6 10 10 6 6 4	-	few fine dry, med	gravel, lov dium stiff.	mostly c v to mediu		ttle fine sand, tra dark gray (10Y					
3 SS	100	5 2 1	-	very dar	k grayish b	orown (10	YR 3/2), dry			SP			
	100	1 1	5-		SH mostly ist, loose.	coal ash	, trace fine s	and, dark gray (10YR				
2/5/18		2	-			sand, few	to little ash	, gray (10YR 5/1),	SP			
6 SS	100	1 1	-	moist, Ic			trans fine a	and dank area. (40VD	_/			
0.10		2	-		urated, loc		, trace line s	and, dark gray (IUTR		\		
290805.0001.0001.0001.2/5/18 4 SS 2 5 SS 5 SS 5 SS 5 SS 5 SS 5 SS 5 S	100	0	-										
		1	10 —										
CORP.GDT		0	10	₹									
SS	100	0											
Σ <u>Ε</u>		2	-	_									
7 SS	100	0	-	_									
ONS.		0	_	-									
8 INISI	50	0	15 —										
SS SS	30	0	10	gray (10	SH mostly YR 5/1) s	/ coal ash aturated	, few to little loose interb	fine sand, trace edded fine sand	silt, Is from	,	4		
¥ N		1	-		t to 16.0 fe		,	Jacoa IIIIo Juliu	.5 0		F		
9 SS	100	0	-	1							3		
2		0	-	-							X		
10 SS SS	100	0	-									目.	
2908		3	20 —					ttle fine sand, tra				:月:	
9 11	100	3 3			lium grave 5/2), moist,		nedium plast	icity, grayish bro	own	CL			
SS SS	100	5 5		CLAYEY	SAND m	ostly med	ium to coars	e sand, few to li	ttle	sc			
JIRUC TRUC			-	medium		nedium gi	ravel, brown	(10YR 5/3), moi	ıst,	CL	1		
ONS			-	CLAY n	nostly clay			and, low to med	lium	_/			
EL C			-				moist, medielow ground						
og <u>×</u>				LIIU OI L	oning at Zz	0 1551 06	Jiow ground	ouiia∪ c .					
30R	oturc			\sim		1	Eirm: TDO	Environmental (Corne	ration			724 074 7000
SOIL BORING WELL CONSTRUCTION LOG 290805,0001 WEADOCK HMP REVISIONS,GPJ TRC	ature:	IJ	rol	Um	1		Firm: TRC 1540	Environmental (Eisenhower Pla	corpor	าสแบก nn Arbor, I	MI 481	80	734-971-7080 Fax 734-971-9022



PROJ. NAME:	CEC Weadock	WELL ID:	JCW-OW-18006			
PROJ. NO:	290805.0001	DATE INSTALLED: 8/20/2018 INSTALL	ED BY: Jake Krenz		CHECKED BY:	CS

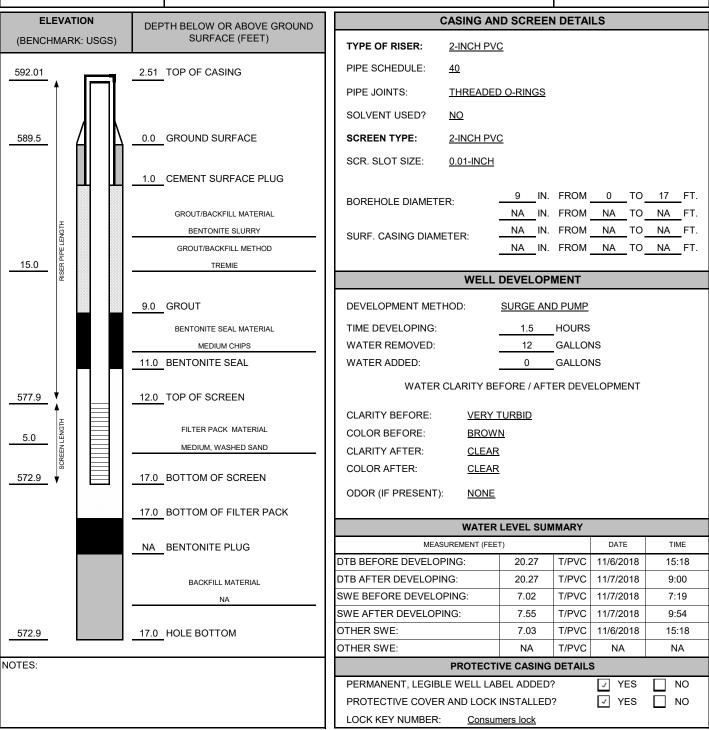


		_					SOIL BOI	RING LOG						
		П	代 (Е	BORING I	NO	JCW	-SB-	
Facilit	ty/Projec	ct Nam	e:					Date Drilling Started	d:	Date Drilling	Comple	eted:		ct Number:
	(CEC	Wead	dock: JCW	HMP Wel	II Installatio	on	8/21/18		8/2	1/18		290	805.0001.0000
Drillin	g Firm:				Drilling Meth	hod:		Surface Elev. (ft)	TOC	Elevation (ft)	Total	Depth (ft bgs)	Borehole Dia. (in)
	St	earns	Drilli	ng	Hol	llow Stem	Auger					20.0		9
Boring	g Locati	on: Ad	djacent	to OW-56, on	the south side	e of the road.		Personnel	Vronz		Drillin	g Equip	ment:	
								Logged By - Jake I Driller - Mike Heffe					CME	E-55
Civil 7	Γown/Ci	ty/or Vi	llage:	County:		State:		Water Level Observ						
	Esse	xville		Bay C	County	Mic	chigan	While Drilling: After Drilling:		/Time /Time				:h (ft bgs) :h (ft bgs)
SAN	/IPLE			,				, <u> </u>						
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			[LITHOLOG DESCRIPTIO	NC			nscs	GRAPHIC LOG	C	COMMENTS
1 SS	50	1 1 2	-	dry, loos		to mediur	m sand, darl	k grayish brown ((10YR	2 4/2),	SP		A wate	r-bearing zone was not
		3	-	CLAY W	VITH SAND	nostly c	lay, few to li	ttle fine sand, lov	W		CL	//	observ installe	ed. No well was
		1	2-					medium stiff.	2.4(0)					
2 SS	100	2	-	loose.	mostly fine	e to mediui	m sand, stro	ng brown (7.5YF	₹ 4/6),	dry,	SP			
		3	-	∖ Change) at 2.5 feet.				CL	//		
		2	4-				(10YR 2/2) a		(0)	/[
3 SS	80	2	-		nostly clay nedium sti		, low plastic	ity, brown (10YR	(5/3),					
		3	6-				l, very dark o	grayish brown (1	0YR 3	5/2),				
		2	-	dry, loo	se.									
SS	80	2	-								SP			
		3	8-	Change	to yellowi	ish brown	(10YR 5/4) a	at 7.5 feet.						
		2		Change	to very da	ark brown	(10YR 2/2) a	at 8.25 feet.						
SS S	100	3 2	-	_										
		2	10-	Change	to dark di	ravish hrov	wn (10YR 4/	2) at 9.75 feet.						
		3 5	-	L			'	medium gravel, I				77	1	
6 SS	100	8	-	plasticit	y, grayish	brown (10	YR 5/2), mo	ist, stiff.	IOW					
		7	12-								CL		1	
		5 8	-											
ss	100	10	-	SILTY C	CLAY mos	stly clay, lit	tle to some	silt, trace fine sa	nd, tra	ice		1//	,	
		14	14	medium	n gravel, lo	w plasticit	y, grayish br	own (10YR 5/2),	mois	t, stiff.	CL- ML			
		5 11	-			o few fine	sand, trace t	to few fine to me	dium	gravel /				
SS S	100	14	_	at 14.25) mostly o	lav fow to li	ttle fine sand, tra	aco to	fow				
		20	16-	fine to n	nedium gra	avel, low p	plasticity, gra	ıyish brown (10Y	'R 5/2), moist,				
		7 11	-	stiff.	J	, ,	7.0	,		,, ,				
ss /	100	14	-								CL			
		20	18-											
10		5 13	-									//,		
10 SS	100	18	-											
	1	32	20 —	End of !	horing at 2	On O foot be	elow ground	surface				///	1	
			-	LINGOL	Joining at 2	.o.o 1661 Dt	ciow ground	Surface.						
			-											
Signa	ture:	-	1				Firm: TRC	Environmental (Corpo	ration				734-971-7080
6 SS SS 8 SS 9 SS S		IJ	rol	/ Lun	1		1540	Eisenhower Pla	ice A	nn Arbor, N	ЛI 481	108		734-971-9022

	7	T	R (WELL CONST	RUCTION LO	G		\ <i>\\'</i> =' '	NIC	OW SED
		1 1	11						vv⊨LL	- NC	D. OW-56R Page 1 of 1
Faci	lity/Proje	t Name	e:			Date Drilling Started:		Date Drilling		ed:	Project Number:
		J	IC W	eadock: 2018 Well R		11/6/18			6/18		290805.0001
Drilli	ng Firm:		D	Drilling Meth		Surface Elev. (ft)		Elevation (ft)	Total D		
Bori		earns		ng Hol to OW-56R.	low Stem Auger	589.5 Personnel	5	92.01	Drilling	17.0	
			-	10 OVV 3014.		Logged By - Jake K Driller - Mike Hefera	an		Drilling	Ечир	CME-55
Civil	Town/Ci	y/or Vil	lage:	County:	State:	Water Level Observa While Drilling:		/Time11/6	/18 10:00		Z Depth (ft bgs) <u>5.5</u>
SA	Essex	sville		Bay County	Michigan	After Drilling:			/18 07:19		Depth (ft bgs) <u>4.02</u>
NUMBER AND TYPE	(%) ,	BLOW COUNTS	DEPTH IN FEET		LITHOLOGIC DESCRIPTION	I		nscs	GRAPHIC LOG	WELL DIAGRAM	COMMENTS
1 HA	100		- - 2- - - - 4-	medium gravel, da roots. Change to no grav	to medium sand, tracark gray (10YR 4/1), delark gray (10YR 4/1), delark 2.0 feet. CLAY few to little clay (10YR 4/1), moist to	ry to moist, loose		t sw			
RP.GDT 290805.0001	100	1 1 2 3 0 1	6 - -		to medium sand, darl			SW			
3018.GPJ TRC_COR	90	2 2 1 1 3	8	SANDY CLAY mo	stly clay, little to some	e fine to medium s	sand.	- OW			
SOIL BORING WELL CONSTRUCTION LOG 280805.0001 WEADOCK WELL REINSTALL 11.2018 GPJ TRC_CORP. GDT 290805.0001 12/3/18	90	5 4 8 10 15	- - 12-	low to medium pla medium stiff to stif	sticity, gray (10YR 6/1), moist to satura	ated,				
SS 9	80	4 9 13 22	- 14 - -	Change to mottled	l with yellowish brown	(10YR 5/4) at 13	.5 fee	et. CL			
7 SS	100	6 9 14 19	- 16 - -	End of having at 4	7 holow ground our						
WELL CONSTRUCT			- 18 — - -	End of boring at 1	7 below ground surfac	J.C.					
Sign Sign	ature:	fre	l)	Vung		Environmental C Eisenhower Place			VII 4810	08	734-971-7080 Fax 734-971-9022



PROJ. NAME:	JC Weadock: 20	WELL ID:	OW-56R			
PROJ. NO:	290805.0001	DATE INSTALLED: 11/6/18	INSTALLED BY:	Jake Krenz		CHECKED BY: DL



	0	TI	R	C	WELL CONST	RUCTION LO	G	v	VELL NO		W-57R IN	
Facil	ity/Projec	ct Name	e:			Date Drilling Started:	: 1	Date Drilli	ing Completed		age 1 of 1 Project Number:	
	, ,			eadock: 2018 Well Re	einstall	11/5/18			1/5/18		290805.000)1
Drillin	ng Firm:		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Drilling Meth		Surface Elev. (ft)	TOC E	levation (f		pth (ft		
		earns	Drill		ow Stem Auger	588.7		90.86		9.0	9"	()
Borir				to OW-57 IN.	ow otem rager	Personnel		50.00	Drilling E			
						Logged By - Jake K Driller - Mike Hefera	an				CME-55	
Civil	Town/Ci	ty/or Vi	llage:	County:	State:	Water Level Observa		Time 11	1/5/18 12:30	⊻	Depth (ft bgs) 5	
	Essex	sville)	Bay County	Michigan	After Drilling:			1/7/18 07:14	Ţ	Depth (ft bgs) 5.	
SA	MPLE											
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET		LITHOLOGIC DESCRIPTION			o S	GRAPHIC LOG	WELL DIAGRAM	COMMENT	·s
				SAND mostly fine	to coarse sand, trace	fine gravel dark	grav	SI	200000	$\overline{}$		
			2-	(10YR 4/1), dry, lo SAND WITH GRAN fine to medium gra	ose	arse sand, few to 4/1), dry, loose.	little	s	,00			
1 HA	100			brown (10YR 5/3)	, few to little fine sand moist, medium stiff.	, medium piastic	ıτy,	С				
1114			-	, , , , , , , , , , , , , , , , , , , ,	coal ash, black (10Y	R 2/1) moist loc	186					
12/3/18			4-	trace roots.	Coal asii, black (101	ix 2/1), moist, loc	, ,					
SOIL BOARING WELL CONSTRUCTION LOG 290805 0001 WEADOCK WELL REINSTALL 11.2018; GP) 1KC_CORF; GD1 290805 0001 12/318 Sign	60	1 1 1 1	6-	-								
SS SS	90	0 0 0	8-									
4 SS	90	0 0 2	10-	SANDY CLAY mo	stly clay, little to some	fine sand medi	um			22		
OI ALL		2		plasticity, gray (10 Change to few me	YR 5/1), moist, soft. dium sand, medium s							
5 SS	100	5 9 13	12-	feet.								
6 SS	100	5 10 13	14 –		brown (10YR 5/2), sti			C	ı.			
7 SS	100	18 4 10 16	16-		sh brown (10YR 5/4) a sh brown (10YR 5/2) n							
8 300 8	100	19 3 10			0YR 4/4) at 16.0 feet.	iotada witi dark						
SS	100	15 22	18 –	End of boring at 19	9.0 feet below ground	surface.						
. K			L .	1								
Sign:	ature:	fro	l (Vung		Environmental C Eisenhower Pla			, MI 4810	3	734-971-7 Fax 734-971-9	



CTRC		WELL CONST	ΓR	UCTION DIA	AGRAN	/1			
PROJ. NAME:	JC Weadock: 2	2018 Well Reinstall				WELL ID:	OW-57F	RIN	
PROJ. NO:	290805.0001	DATE INSTALLED: 11/5/18	INS	STALLED BY: Ja	ike Krenz		CHECK	ED BY: DL	
ELEVATIO	N DE	EPTH BELOW OR ABOVE GROUND			CASING AN	D SCREEN	I DETAI	LS	
(BENCHMARK:	USGS)	SURFACE (FEET)		TYPE OF RISER:	2-INCH PV	2			
590.86	2.16	TOP OF CASING		PIPE SCHEDULE:	<u>40</u>				
<u> </u>				PIPE JOINTS:	THREADED	O-RINGS			
				SOLVENT USED?	<u>NO</u>				
588.7	0.0	GROUND SURFACE		SCREEN TYPE:	2-INCH PV				
		_		SCR. SLOT SIZE:	0.01-INCH	=			
	1.0	CEMENT SURFACE PLUG		33111 323 1 31221	<u> </u>				
				BOREHOLE DIAMETI	ER:	9 IN.	FROM	0 TO	18 FT.
 		GROUT/BACKFILL MATERIAL			•			18 TO	
ELENG		BENTONITE SLURRY GROUT/BACKFILL METHOD		SURF. CASING DIAM	IETER:			NA TO	
MSER PIPE LENGTH		TREMIE			•				
					WELL	DEVELOP	MENT		
	9.0	GROUT		DEVELOPMENT MET	HOD:	SURGE ANI	D PUMP		
		BENTONITE SEAL MATERIAL		TIME DEVELOPING:		0.75	HOURS		
		MEDIUM CHIPS		WATER REMOVED:		6	GALLON		
	11.0	BENTONITE SEAL		WATER ADDED:		0	GALLON	NS	
575.7 ▼	13.0	TOP OF SCREEN		WATER	CLARITY BE	FORE / AFT	ER DEVE	ELOPMENT	
↑				CLARITY BEFORE:	VERY T	URBID			
SCREEN LENGTH		FILTER PACK MATERIAL		COLOR BEFORE:	VERY D	OARK GRAY			
OREE E		MEDIUM, WASHED SAND		CLARITY AFTER:	CLEAR				
570.7	18.0	BOTTOM OF SCREEN		COLOR AFTER:	CLEAR				
				ODOR (IF PRESENT)	: <u>NONE</u>				
	19.0	BOTTOM OF FILTER PACK	Н		WATER	LEVEL SUN	IMADV		
	NA	BENTONITE PLUG	Н	MEA	SUREMENT (FEET		IIVIARI	DATE	TIME
	INA	DENTONITE FLOG		OTB BEFORE DEVELO	,	20.23	T/PVC	11/5/2018	15:31
		BACKFILL MATERIAL		OTB AFTER DEVELOP	ING:	20.27	T/PVC	11/7/2018	10:35
		NA		SWE BEFORE DEVELO	PING:	7.02	T/PVC	11/7/2018	7:14
			1 -	SWE AFTER DEVELOP	PING:	17.05	T/PVC	11/7/2018	10:46
569.7	19.0	HOLE BOTTOM	1 -	OTHER SWE: OTHER SWE:		7.21 NA	T/PVC T/PVC	11/6/2018	7:17 NA
I			IJ [ˈ	JITIER SWE.		INA	1/2 00	NA	INA

PERMANENT, LEGIBLE WELL LABEL ADDED?

PROTECTIVE COVER AND LOCK INSTALLED?

Consumers lock

LOCK KEY NUMBER:

√ YES

✓ YES □ NO

	7	T	R (<u> </u>	WELL CONST	RUCTION LO	G	\A/E!!	NO	OVA	LEZD OUT
		•				1					/-57R OUT Page 1 of 1
Facili	ty/Projed					Date Drilling Started:	:	Date Drilling		ed:	Project Number:
Drillin	a Eirm:	J	CW	eadock: 2018 Well R		11/5/18 Surface Elev. (ft)	TOCE	11/ Elevation (ft)	5/18	onth (290805.0001
I DUNIE	ng Firm:	earns	Drilli	Drilling Meth	low Stem Auger	589.0		91.00	Total D	eptn (1 17.0	ft bgs) Borehole Dia. (in)
Borin				to OW-57 OUT.	low Sterri Auger	Personnel	5	91.00	Drilling		
			,			Logged By - Jake K Driller - Mike Hefera			J9	_40.6	CME-55
Civil	Town/Ci	y/or Vil	lage:	County:	State:	Water Level Observa	ations: Date/	Time			Depth (ft bgs)
	Essex	sville		Bay County	Michigan	After Drilling:			/18 00:00	_ Ā	Depth (ft bgs) <u>6.58</u>
NUMBER AND TYPE	(%)	BLOW COUNTS	DEPTH IN FEET		LITHOLOGIC DESCRIPTION	I		nscs	GRAPHIC LOG	WELL DIAGRAM	COMMENTS
1 HA	100		- 2- - - - 4-	medium gravel, da Change to no grav feet. Change to yellowi	to medium sand, tracerk gray (10YR 4/1), delenged, brownish yellow (1) sh brown (10YR 5/4) ash yellow (10YR 6/6) a	ry, loose. IOYR 6/6), moist a at 2.5 feet.	at 1.0	SP			
2 SS SS	80	2 4 12 10	6	▼Change to red (2.5	5YR 4/6) at 6.5 feet.						
3 SS SS	90	2 1 1 2	- 8- -	Change to brown	own (10YR 6/3) a 8.0 (10YR 5/3) 8.5 feet.			PT	<u>\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\</u>		
4 SS	75	2 1 1 2	10 -	very dark gray (10 SANDY CLAY mo	anic material, trace fine YR 3/1), moist, soft to stly, little to some, fine noist, medium plastici	medium stiff. e to medium sand					
SS 5	100	12 6 10 12	12 —	Change to mediur	n stiff, plant roots at 1	2.0 feet.					
6 SS	90	4 9 11 16	- 14 — -		sh brown (10YR 5/4) r I0YR 4/4), stiff, no pla			CL			
7 SS	100	7 11 15 21	- - 16	Change to trace fi (10YR 6/2), mediu	ne to medium gravel, ım stiff at 15.0 feet.	light brownish gra	ay				
SOIL BOARING WELL CONSTRUCTION LOG 290805,0001 WEADOOK WELL REINSTALL 11,2018,GPJ 1RC_CORF.GPJ 290805,0001 12,3718 SOIL BOARING WELL CONSTRUCTION LOG 290805,0001 WEADOOK WELL REINSTALL 11,2018,GPJ 1RC_CORF.GPJ 290805,0001 12,3718 SOIL BOARING WELL CONSTRUCTION LOG 290805,0001 WEADOOK WELL REINSTALL 11,2018,GPJ 1RC_CORF.GPJ 290805,0001 12,3718			- 18 — - -	End of boring at 1	7.0 feet below ground	surface.					
Signa	ature:	fre	l (Vanz	Firm: TRC	Environmental C	Corpor ce Ar	ation nn Arbor, I	MI 4810	08	734-971-7080 Fax 734-971-9022



CTRC		WELL CONST	JCTION DIAGRAM	
PROJ. NAME:	JC Weadoo	ck: 2018 Well Reinstall	WELL ID: OW-57R	OUT
PROJ. NO:	290805.000	01 DATE INSTALLED: 11/5/18	TALLED BY: Jake Krenz CHECKI	ED BY: DL
ELEVATIO	N	DEPTH BELOW OR ABOVE GROUND	CASING AND SCREEN DETAIL	LS
(BENCHMARK:	USGS)	SURFACE (FEET)	TYPE OF RISER: 2-INCH PVC	
591.00		2.0 TOP OF CASING	PIPE SCHEDULE: 40	
<u> </u>	Ш <u>"</u> —		PIPE JOINTS: THREADED O-RINGS	
			SOLVENT USED? NO	
589.0	II I <u>I</u> _	0.0 GROUND SURFACE	SCREEN TYPE: 2-INCH PVC	
			SCR. SLOT SIZE: <u>0.01-INCH</u>	
	╽ _	1.0 CEMENT SURFACE PLUG		
		ODOUT/DACKELL MATERIAL	BOREHOLE DIAMETER: -	0 TO 17 FT. NA TO NA FT.
БТН		GROUT/BACKFILL MATERIAL BENTONITE SLURRY	NA IN FROM	NA TO NA FT.
HISSER PIPE LENGTH		GROUT/BACKFILL METHOD	SON CASING DIAMETER. ———	NA TO NA FT.
15.0 La	-	TREMIE	WELL DEVELOPMENT	
			WELL DEVELOPMENT	
		9.0 GROUT	DEVELOPMENT METHOD: SURGE AND PUMP	
		BENTONITE SEAL MATERIAL	TIME DEVELOPING: 0.75 HOURS	
	l III –	MEDIUM CHIPS	WATER REMOVED: 6 GALLON	IS
	-	11.0 BENTONITE SEAL	WATER ADDED: 0 GALLON	IS
<u>577.0</u> ¥		12.0 TOP OF SCREEN	WATER CLARITY BEFORE / AFTER DEVE	LOPMENT
1			CLARITY BEFORE: <u>VERY TURBID</u>	
5.0		FILTER PACK MATERIAL	COLOR BEFORE: <u>BROWN</u>	
SCREEN LENGTH	<u> </u>	MEDIUM, WASHED SAND	CLARITY AFTER: <u>CLEAR</u>	
572.0 ▼		17.0 BOTTOM OF SCREEN	COLOR AFTER: <u>CLEAR</u>	
			ODOR (IF PRESENT): <u>NONE</u>	
		17.0 BOTTOM OF FILTER PACK	WATER LEVEL CUMMARY	
		NA DENTONITE DI LIC	WATER LEVEL SUMMARY MEASUREMENT (FEET)	DATE TIME
		NA BENTONITE PLUG	TB BEFORE DEVELOPING: 20.27 T/PVC	11/6/2018 7:19
		BACKFILL MATERIAL	TB AFTER DEVELOPING: 20.27 T/PVC	11/7/2018 11:30
		NA NA	WE BEFORE DEVELOPING: 9.58 T/PVC	11/7/2018 7:15
			WE AFTER DEVELOPING: 19.00 T/PVC	11/7/2018 11:31
572.0		17.0 HOLE BOTTOM	THER SWE: 10.03 T/PVC	11/6/2018 7:19
			THER SWE: NA T/PVC	NA NA

PROTECTIVE CASING DETAILS

Consumers lock

√ YES

✓ YES

☐ NO

■ NO

PERMANENT, LEGIBLE WELL LABEL ADDED?

PROTECTIVE COVER AND LOCK INSTALLED?

LOCK KEY NUMBER:

NOTES:



MONITORING WELL DECOMMISSIONING LOG

PROJECT NAME: CEC: JC Weadock	MONITORING WELL ID: JCW-M	W-15023
PROJECT NUMBER: 290805 P2 T4 DATE: 05/23/2018	LOCATION:	LOCATION COORDINATES:
OBSERVED BY: Jacob Krenz	Located N of Pond B1 on the left side of	N: 780840.7
DRILLING CONTRACTOR: STEARNS DRILLING	the access road running along the discharge channel.	E: 13265275.9
CREW CHIEF: Gary Geerligs	TOP OF CASING ELEV.: 595.32	SURFACE ELEV.: 592.7
WELL CASING DIAMETER: ☐ 1" ☑ 2" ☐ 4" ☐ 6" ☐ 8" ☐	OTHER GALVANIZED STEEL OTHER GALVANIZED STEEL OTHER OTHER DTW: DTB: Ow stem augers were advanced to the total as used to grout the bore hole from the bott	om up using the tremie
GROUTING PROCEDURE: TREMIE GROUT TYPE: BENTONITE SLURRY	NOTES:	
GROUT MIX: GROUT INTERVAL: 18 FT-BGS TO 1 FT-BGS		
BENTONITE SEAL: MEDIUM CHIPS SEAL INTERVAL: 1 FT-BGS TO 0 FT-BGS		
ADDITIONAL COMMENTS:		

Chin Levisco 10/24/18

SIGNED DATE

CHECKED DATE

REVISED 06/2011



MONITORING WELL DECOMMISSIONING LOG

PROJECT NAME: CEC: JC Weadock	MONITORING WELL ID: JCV	V-MW-15011
PROJECT NUMBER: 290805 P2 T4 DATE: 05/23/2018	LOCATION:	LOCATION COORDINATES:
OBSERVED BY: Jacob Krenz	Located N of Pond B1 on the left side	of N: 780807.4
DRILLING CONTRACTOR: STEARNS DRILLING	the access road running along the discharge channel.	E: 13265133.1
CREW CHIEF: Gary Geerligs	TOP OF CASING ELEV.: 597.07	SURFACE ELEV.: 594.9
PROTECTIVE COVER TYPE: STICK-UP FLUSH MOUN PROTECTIVE COVER DIAMETER: 4" 8" 9" 10" 12"		
	GALVANIZED STEEL OTHER	
WELL CASING DIAMETER: □ 1" ✓ 2" □ 4" □ 6" □ 8" □		
WELL SCREEN MATERIAL:	GALVANIZED STEEL OTHER	
WELL SCREEN LENGTH: ☐ 5-FT ☐ 10-FT ☐ UNKNOWN ✓	OTHER 3-FT	V: <u>13.59</u> T/ PVC
WELL SCREEN SLOT SIZE:	OTHER DTE	: <u>18.29</u> T/ PVC
DECOMMISSIONING PROCEDURE: OVERDRILL AND GROUT		
GROUTING PROCEDURE: TREMIE	NOTES:	
GROUT TYPE: BENTONITE SLURRY		
GROUT MIX:		
GROUT INTERVAL: 16 FT-BGS TO 1 FT-BGS		
BENTONITE SEAL: MEDIUM CHIPS		
SEAL INTERVAL: 1 FT-BGS TO 0 FT-BGS		
ADDITIONAL COMMENTS:		

Date CHECKED CHECKED

REVISED 06/2011



MONITORING WELL DECOMMISSIONING LOG

PROJECT NAME: CEC: JC Weadock	MONITORING WELL ID: JCW	-MW-15012
PROJECT NUMBER: 290805 P2 T4 DATE: 05/23/2018	LOCATION:	LOCATION COORDINATES:
OBSERVED BY: Jacob Krenz	Located N of Pond B1 on the left side of	f N: 780995.6
DRILLING CONTRACTOR: STEARNS DRILLING	the access road running along the discharge channel.	E: 13265672.5
CREW CHIEF: Gary Geerligs	TOP OF CASING ELEV.: 595.07	SURFACE ELEV.: 592.2
WELL CASING DIAMETER: 1" 2" 4" 6" 8"	OTHEROTHER GALVANIZED STEEL OTHER OTHER	
	GALVANIZED STEEL OTHER	
WELL SCREEN LENGTH: ☐ 5-FT ☐ 10-FT ☐ UNKNOWN ☐ WELL SCREEN SLOT SIZE: ☐ 0.01" ☐ 0.02" ☐ UNKNOWN ☐		
	JOHILIK BIB	<u>10.70</u> // FVC
DECOMMISSIONING PROCEDURE: OVERDRILL AND GROUT NOTES:		
its original condition using surrounding gravel.		
GROUTING PROCEDURE: TREMIE	NOTES:	
GROUT TYPE: BENTONITE SLURRY GROUT MIX:		
GROUT INTERVAL: 16 FT-BGS TO 1 FT-BGS		
BENTONITE SEAL: MEDIUM CHIPS SEAL INTERVAL: 1 FT-BGS TO 0 FT-BGS		
ADDITIONAL COMMENTS:		

Climberger 10/24/18

Dale Date CHECKED DATE

Appendix B Data Quality Reviews

Laboratory Data Quality Review Groundwater Monitoring Event April 2018 CEC DE Karn and JC Weadock Background Wells

Groundwater samples were collected by TRC for the April 2018 sampling event. Samples were analyzed for anions and total metals by Pace Analytical Services, LLC (Pace), located in Grand Rapids, Michigan, and for radium by Pace located in Greensburg, Pennsylvania. The laboratory analytical results are reported in laboratory reports 4610843 and 4610844.

During the April 2018 sampling event, a groundwater sample was collected from each of the following wells:

• MW-15002

• MW-15016

• MW-15008

• MW-15019

Each sample was analyzed for the following constituents:

Analyte Group	Method
Anions (Fluoride)	EPA 300.0
Total Metals	EPA 6020A, EPA 6010C, EPA 7470A
Radium (Radium-226, Radium-228, Total Radium)	EPA 903.1, EPA 904.0

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) and the Department of Energy Evaluation of Radiochemical Data Usability (USDOE, 1997). The following items were included in the evaluation of the data:

- Sample receipt;
- Technical holding times for analyses;
- Reporting limits (RLs) compared to project-required RLs;
- Data for method blanks and field blanks. Method blanks are used to assess potential contamination arising from laboratory sample preparation and/or analytical procedures.
 Field blanks are used to assess potential contamination arising from field procedures;
- Data for laboratory control samples (LCSs). The LCSs are used to assess the accuracy of the analytical method using a clean matrix;

- Percent recoveries for matrix spike (MS) and matrix spike duplicates (MSD), when performed on project samples. Percent recoveries are calculated for each analyte spiked and used to assess bias due to sample matrix effects;
- 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;
- Data for blind field duplicates. Field duplicate samples are used to assess variability introduced by the sampling and analytical processes; 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 IV constituents will be utilized for the purposes of an assessment monitoring program.
- Data are usable for the purposes of the assessment monitoring program.
- When the data are evaluated through an assessment monitoring statistical program, findings below may be used to support the removal of outliers.

QA/QC Sample Summary:

- A method blank was analyzed with each analytical batch; no analytes were detected in the blank samples.
- The LCS recoveries for all analytes were within QC limits.
- A field blank (FB-20180410) was collected; no analytes were detected in the blank samples.
- Dup_20180410 corresponds to MW-15008_20180410; relative percent differences (RPDs) between the parent and duplicate sample were within the QC limits.
- Laboratory duplicates analyses were performed on non-project samples; RPDs were within QC limits.
- MS/MSD analyses were performed on non-project samples.

Laboratory Data Quality Review Groundwater Monitoring Event May 2018 CEC DE Karn and JC Weadock Background Wells

Groundwater samples were collected by TRC for the May 2018 sampling event. Samples were analyzed for anions, total dissolved solids, and total metals by Pace Analytical Services, LLC (Pace), located in Grand Rapids, Michigan, and for radium by Pace located in Greensburg, Pennsylvania. The laboratory analytical results are reported in laboratory reports 4612624 and 4612625.

During the May 2018 sampling event, a groundwater sample was collected from each of the following wells:

• MW-15002

• MW-15016

• MW-15008

MW-15019

Each sample was analyzed for the following constituents:

Analyte Group	Method
Anions (Fluoride, Chloride, Sulfate)	EPA 300.0
Total Dissolved Solids	SM 2540C-11
Total Metals	EPA 6020A, EPA 6010C, EPA 7470A
Radium (Radium-226, Radium-228, Total Radium)	EPA 903.1, EPA 904.0

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) and the Department of Energy Evaluation of Radiochemical Data Usability (USDOE, 1997). The following items were included in the evaluation of the data:

- Sample receipt;
- Technical holding times for analyses;
- Reporting limits (RLs) compared to project-required RLs;
- Data for method blanks and field blanks. Method blanks are used to assess potential contamination arising from laboratory sample preparation and/or analytical procedures.
 Field blanks are used to assess potential contamination arising from field procedures;

- Data for laboratory control samples (LCSs). The LCSs are used to assess the accuracy of the analytical method using a clean matrix;
- Percent recoveries for matrix spike (MS) and matrix spike duplicates (MSD), when performed on project samples. Percent recoveries are calculated for each analyte spiked and used to assess bias due to sample matrix effects;
- 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;
- Data for blind field duplicates. Field duplicate samples are used to assess variability introduced by the sampling and analytical processes; 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 and IV constituents will be utilized for the purposes of an assessment monitoring program.
- Data are usable for the purposes of the assessment monitoring program.
- When the data are evaluated through an assessment monitoring statistical program, findings below may be used to support the removal of outliers.

QA/QC Sample Summary:

- A method blank was analyzed with each analytical batch; no analytes were detected in the blank samples.
- The LCS recoveries for all analytes were within QC limits.
- A field blank (FB_20180522) was collected; no analytes were detected in the blank samples.
- The field duplicate pair samples were Dup_20180522 with MW-15019_20180522; relative percent differences (RPDs) between the parent and duplicate sample were within the QC limits (20%), with the exception of sulfate (25%). Potential uncertainty exists for sulfate results for the field duplicate pair (see attached Table); however, the concentrations of sulfate detected in both the duplicate and primary sample were within the range of historical sulfate concentrations observed in MW-15019.

- Laboratory duplicates analyses were performed on non-project samples; thus, these QC samples were not evaluated.
- MS/MSD analyses were performed on non-project samples; thus, these QC samples were not evaluated.

Attachment B

Summary of Data Non-Conformances for Background Groundwater Analytical Data DE Karn & JC Weadock – RCRA CCR Monitoring Program Essexville, Michigan

Samples	Collection Date	Analyte	Non-Conformance/Issue
Dup_20180522	5/22/2018	- Sulfate	RPD for the field duplicate pair exceeded the 20% acceptance limit. Potential uncertainty
MW-15019_20180522	5/22/2018	Suilate	exists for sulfate results due to the field duplicate variability; however, concentrations are within range of historical sulfate concentrations. Data deemed usable for intended purpose.

Laboratory Data Quality Review Groundwater Monitoring Event April 2018 CEC JC Weadock Landfill

Groundwater samples were collected by TRC for the April 2018 sampling event. Samples were analyzed for anions and total metals by Pace Analytical Services, LLC (Pace), located in Grand Rapids, Michigan, and for radium by Pace located in Greensburg, Pennsylvania. The laboratory analytical results are reported in laboratory reports 4610845 and 4610846.

During the April 2018 sampling event, a groundwater sample was collected from each of the following wells:

• JCW-MW-15011

• JCW-MW-15012

• ICW-MW-15023

Each sample was analyzed for the following constituents:

Analyte Group	Method
Anions (Fluoride)	EPA 300.0
Total Metals	EPA 6020A, EPA 6010C, EPA 7470A
Radium (Radium-226, Radium-228, Total Radium)	EPA 903.1, EPA 904.0

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) and the Department of Energy Evaluation of Radiochemical Data Usability (USDOE, 1997). The following items were included in the evaluation of the data:

- Sample receipt;
- Technical holding times for analyses;
- Reporting limits (RLs) compared to project-required RLs;
- Data for method blanks and field blanks. Method blanks are used to assess potential contamination arising from laboratory sample preparation and/or analytical procedures.
 Field blanks are used to assess potential contamination arising from field procedures;
- Data for laboratory control samples (LCSs). The LCSs are used to assess the accuracy of the analytical method using a clean matrix;

- Percent recoveries for matrix spike (MS) and matrix spike duplicates (MSD), when performed on project samples. Percent recoveries are calculated for each analyte spiked and used to assess bias due to sample matrix effects;
- 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;
- Data for blind field duplicates. Field duplicate samples are used to assess variability introduced by the sampling and analytical processes; 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 IV constituents will be utilized for the purposes of an assessment monitoring program.
- Data are usable for the purposes of the assessment monitoring program.
- When the data are evaluated through an assessment monitoring statistical program, findings below may be used to support the removal of outliers.

QA/QC Sample Summary:

- A method blank was analyzed with each analytical batch. Normalized absolute difference comparisons between blank and sample that are between 1.96 and 2.58 may indicate biased high results and normalize absolute differences <1.96 may indicate a false positive sample result, as summarized in the attached table.
 - Radium-228 was detected in the method blank associated with batch 295492 at 0.864 ± 0.447 pCi/L. Radium results for samples analyzed in the same batch as the method blank are potentially impacted (see attached table); however, the concentrations of radium-228 detected in the sample associated with batch 295492 (JCW-MW-15012) was within the range of historical radium-228 concentrations.
- One equipment blank (EB-2) and one field blank (FB-2) were collected; no analytes were detected in the blank samples.
- The LCS recoveries for all analytes were within QC limits.

- MS/MSDs were performed on sample JCW-MW-15012 for fluoride, radium, and metals. All criteria were met.
- Dup-2 corresponds to JCW-MW-15011; relative percent differences (RPDs) between the parent and duplicate sample were within the QC limits.
- Laboratory duplicate analyses were performed on sample JCW-MW-15012 for fluoride; RPDs were within QC limits.

Attachment B

Summary of Data Non-Conformances for Landfill Groundwater Analytical Data JC Weadock – RCRA CCR Monitoring Program Essexville, Michigan

Samples	Collection Date	Analyte	Non-Conformance/Issue
JCW-MW-15012_20180411	4/11/2018	Radium-228	Detection in method blank. Normalized absolute difference between blank and sample <1.96; indicates a possible false positive result; however, the concentration of radium-228 was within the range of historical radium-228 concentrations at JCW-MW-15012.

Laboratory Data Quality Review Groundwater Monitoring Event May 2018 CEC JC Weadock Landfill

Groundwater samples were collected by TRC for the May 2018 sampling event. Samples were analyzed for anions, total dissolved solids, and total metals by Pace Analytical Services, LLC (Pace), located in Grand Rapids, Michigan, and for radium by Pace located in Greensburg, Pennsylvania. The laboratory analytical results are reported in laboratory reports 4612622 and 4612623.

During the May 2018 sampling event, a groundwater sample was collected from each of the following wells:

• JCW-MW-15011

• JCW-MW-15012

• JCW-MW-15023

Each sample was analyzed for the following constituents:

Analyte Group	Method
Anions (Fluoride, Chloride, Sulfate)	EPA 300.0
Total Dissolved Solids	SM-2540C-11
Total Metals	EPA 6020A, EPA 6010C, EPA 7470A
Radium (Radium-226, Radium-228, Total Radium)	EPA 903.1, EPA 904.0

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) and the Department of Energy Evaluation of Radiochemical Data Usability (USDOE, 1997). The following items were included in the evaluation of the data:

- Sample receipt;
- Technical holding times for analyses;
- Reporting limits (RLs) compared to project-required RLs;
- Data for method blanks and field blanks. Method blanks are used to assess potential contamination arising from laboratory sample preparation and/or analytical procedures. Field blanks are used to assess potential contamination arising from field procedures;
- Data for laboratory control samples (LCSs). The LCSs are used to assess the accuracy of the analytical method using a clean matrix;

- Percent recoveries for matrix spike (MS) and matrix spike duplicates (MSD), when performed on project samples. Percent recoveries are calculated for each analyte spiked and used to assess bias due to sample matrix effects;
- 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;
- Data for blind field duplicates. Field duplicate samples are used to assess variability introduced by the sampling and analytical processes; 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 and IV constituents will be utilized for the purposes of an assessment monitoring program.
- Data are usable for the purposes of the assessment monitoring program.
- When the data are evaluated through an assessment monitoring statistical program, findings below may be used to support the removal of outliers.

QA/QC Sample Summary:

- A method blank was analyzed with each analytical batch. No analytes were detected in the method blanks.
- One equipment blank (EB-02) and one field blank (FB-02) were collected.
 - Radium-228 was detected in FB-02 at a concentration of 1.49 ± 0.560 pCi/L. Radium-228 was not detected in the associated samples. Data usability was not affected.
- The LCS recoveries for all analytes were within QC limits.
- MS/MSDs were performed on sample JCW-MW-15012 for metals.
 - The recoveries of boron in the MS/MSD were above the upper laboratory control limit in batch 24667. The boron concentration in the parent sample was >4x the spike concentration; therefore, the laboratory control limits are not applicable. Data usability was not affected.

- The recovery of calcium in the MSD was below the lower laboratory control limit in batch 246663. The calcium results for samples analyzed in this batch may be biased low (see attached Table); however, the concentrations of calcium detected in batch 246663 samples were within the range of historical calcium concentrations.
- Field duplicate pair samples were Dup-2 and JCW-MW-15023; relative percent differences (RPDs) between the parent and duplicate sample were within the QC limits.
- Laboratory duplicate analyses were performed on sample JCW-MW-15012 for anions and total dissolved solids; RPDs were within QC limits.

Attachment B

Summary of Data Non-Conformances for Landfill Groundwater Analytical Data JC Weadock – RCRA CCR Monitoring Program Essexville, Michigan

Samples	Collection Date	Analyte	Non-Conformance/Issue
Dup-02_20180521	5/21/2018		
EB-02_20180521	5/21/2018		
FB-02_20180521	5/21/2018	Calcium	Recovery in the MSD was below the lower laboratory control limits. The result may be biased low; however, the concentrations of calcium were within the range of historical
JCW-MW-15011_20180521	5/21/2018	Calcium	calcium concentrations
JCW-MW-15012_20180521	5/21/2018		
JCW-MW-15023_20180521	5/21/2018		

Appendix C Groundwater Protection Standards



Date: October 15, 2018; Revised December 7, 2018

To: J.R. Register, CEC

Brad Runkel, CEC

From: Darby Litz, TRC

Sarah Holmstrom, TRC Joyce Peterson, TRC

Project No.: 290805.0000 Phase 001, Task 002

Subject: Groundwater Protection Standards – Consumers Energy, JC Weadock Site,

Landfill Unit

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). The first detection monitoring event for the Consumers Energy Company (CEC) JC Weadock Power Plant (JCW site) in Essexville, Michigan, was conducted on September 18 and 19, 2017. During this event several Appendix III constituents were observed in downgradient monitoring wells at concentrations constituting statistically significant increases (SSIs) over the background concentrations established for the site (2017 Annual Report). Alternative Source Demonstrations (ASDs) were unsuccessful for one or more SSI, thereby triggering the requirement for establishing an Assessment Monitoring Program in accordance with 40 CFR §257.95. Groundwater samples were collected on April 10 through 12, 2018, that were analyzed for Appendix IV parameters pursuant to §257.95(b). In compliance with §257.95(d), additional groundwater samples were collected on May 21 through 24, 2018, and were analyzed for Appendix III and IV parameters. Analytical data collected from the background monitoring wells are presented in attached Table A1.

If assessment monitoring is triggered pursuant to §257.94(e)(1), data are compared to Groundwater Protection Standards (GWPSs). The CCR Rule [§257.95(h)] requires GWPSs to be established for Appendix IV constituents that have been detected during baseline sampling. Per §257.95(h)¹, the MCLs will be the GWPSs for those constituents that have established MCLs. For Appendix IV constituents

 $X: \ \ VPAAM \ PJT2 \ 290805 \ \ 0000 \ \ GWPS \ \ LF \ \ ATTC \ \ TM290805 \ \ ATTC-LF.DOCX$

¹ As amended per Phase One, Part One of the CCR Rule (83 FR 36435).

that do not have established MCLs, the GWPSs are based upon the EPA Regional Screening Levels (RSLs). For constituents that have statistically derived background levels higher than the MCL and/or RSL, the GWPS becomes the background level.

This memorandum presents the background statistical limits and GWPS derived for the Appendix IV parameters for the JC Weadock site using the aforementioned approach pursuant to §257.95(h). However, it should be noted that in the future, risk-based standards may be used in place of the GWPSs presented in this memorandum based on promulgated rule changes and/or authorization for the state of Michigan to administer and enforce compliance with the CCR Rule.

Following the Appendix IV baseline data collection period (December 2015 through April 2018), the Appendix IV background data were evaluated in accordance with the Groundwater Statistical Evaluation Plan (Stats Plan) (TRC, October 2017). The June 2018 data were not included in the baseline dataset and were not used to establish background limits. The JCW site background groundwater data are maintained within a database 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. Additionally, tolerance limits are recommended by the UG as an acceptable approach to establish background-based groundwater protection standards for assessment monitoring under the CCR rule. Upper tolerance limits (UTLs) were calculated for each of the CCR Appendix IV 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 DEK BAP, JCW BAP, and JCW LF sites includes MW-15002, MW-15008, MW-15016, and MW-15019. The background evaluation included the following steps:

- Review of data quality reports for the baseline/background data sets for CCR Appendix IV 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 background well-constituent (w/c) pair;
- Distribution of the data;

- Calculation of the UTL for each cumulative background data set; and
- Establishment of GWPS as the higher of the MCL, RSL or the UTL for each Appendix IV constituent.

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.

Time versus Concentration Graphs

The T v. C graphs show a potential outlier for lithium (high value for MW-15016 in February 2017) (Figure 1). This data set will be tested by the SanitasTM software to assess whether the potential outliers are statistically significant.

While variations in results are present, the graphs 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 is the case at the Karn and Weadock complex. When sorted by concentration, the data generally group by well (Figure 2). Most of the parameters have a relatively consistent distribution. These results need to be taken into consideration as they represent potential non-CCR upgradient contributions to downgradient wells.

Outlier Testing

The Dixon's Outlier Test in SanitasTM was used to test the potential outlier in the lithium data set for MW-15016 that was identified in the T v. C graphs (Figure 1) and in the cumulative concentration distribution (Figure 2). The suspect data point was found to not be an outlier at the 0.01 significance level (see attached SanitasTM output file). The potential outlier was not confirmed and not removed from the data set. The data point will be retained for the Groundwater Protection Standards UTL calculations.

Percentage of Nondetects

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

Table 1
Summary of Percentage of Appendix IV Baseline Results Below Reporting Limit

WELL	CONSTITUENT	PERCENT NON-DETECT
MW-15002	Antimony	100
	Arsenic	25
	Barium	0
	Beryllium	100
	Cadmium	100
	Chromium	13
	Cobalt	100
	Fluoride	100
	Lead	100
	Lithium	38
	Mercury	100
	Molybdenum	100
	Selenium	88
	Thallium	100
	Radium 226 and 228 combined	38
MW-15008	Antimony	100
	Arsenic	50
	Barium	0
	Beryllium	100
	Cadmium	100
	Chromium	0
	Cobalt	100
	Fluoride	100
	Lead	100
	Lithium	0
	Mercury	100
	Molybdenum	100
	Selenium	100
	Thallium	100
	Radium 226 and 228 combined	13
MW-15016	Antimony	100
-	Arsenic	0
	Barium	0
	Beryllium	100
	Cadmium	100
	Chromium	50
	Cobalt	100
	Fluoride	100

Table 1
Summary of Percentage of Appendix IV Baseline Results Below Reporting Limit

WELL	CONSTITUENT	PERCENT NON-DETECT
MW-15016 (cont'd)	Lead	100
	Lithium	0
	Mercury	100
	Molybdenum	75
	Selenium	75
	Thallium	100
	Radium 226 and 228 combined	25
MW-15019	Antimony	100
	Arsenic	88
	Barium	0
	Beryllium	100
	Cadmium	100
	Chromium	50
	Cobalt	100
	Fluoride	100
	Lead	100
	Lithium	0
	Mercury	100
	Molybdenum	100
	Selenium	100
	Thallium	100
	Radium 226 and 228 combined	13
COMBINED	Antimony	100
	Arsenic	41
	Barium	0
	Beryllium	100
	Cadmium	100
	Chromium	33
	Cobalt	100
	Fluoride	100
	Lead	100
	Lithium	9
	Mercury	100
	Molybdenum	94
	Selenium	91
	Thallium	100
	Radium 226 and 228 combined	22

Distribution of the Data Sets

The distribution of the data sets is determined by the SanitasTM software during calculation of the upper tolerance limit. The Shapiro-Wilk normality test is used for samples sizes less than 50. Non-detect/censored data were handled in accordance with the Stats 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 SanitasTM software. The distribution is based on the combined baseline results for all four background monitoring wells.

Table 2 Summary of Background/Baseline Data Distributions

CONSTITUENT	DISTRIBUTION
Antimony	All ND – use highest RL
Arsenic	Nonnormal
Barium	Normalized by natural log transformation
Beryllium	All ND – use highest RL
Cadmium	All ND – use highest RL
Chromium	Nonnormal
Cobalt	All ND – use highest RL
Fluoride	All ND – use highest RL
Lead	All ND – use highest RL
Lithium	Nonnormal
Mercury	All ND – use highest RL
Molybdenum	Nonnormal (>75% censored data)
Selenium	Nonnormal (>75% censored data)
Thallium	All ND – use highest RL
Radium 226 and 228 combined	Normalized by square root transformation

ND = Non-detect

RL = Reporting Limit

Upper Tolerance Limits

Table 3 presents the calculated upper tolerance limits for the background/baseline data sets. For data sets with normal distributions or distributions normalized by transformation, 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 SanitasTM 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 Initial Groundwater Protection Standards

CONSTITUENT	UNITS	UPPER TOLERANCE LIMIT - FROM SANITAS™	MAXIMUM CONTAMINANT LEVEL	REGIONAL SCREENING LEVEL	GROUNDWATER PROTECTION STANDARD
Antimony	ug/L	RL (1)	6	NA	6
Arsenic	ug/L	21	10	NA	21
Barium	ug/L	1,300	2,000	NA	2,000
Beryllium	ug/L	RL (1)	4	NA	4
Cadmium	ug/L	RL (0.2)	5	NA	5
Chromium	ug/L	3	100	NA	100
Cobalt	ug/L	RL (15)	NC	6	15
Fluoride	ug/L	RL (1,000)	4,000	NA	4,000
Lead	ug/L	RL (1)	NC	15	15
Lithium	ug/L	180	NC	40	180
Mercury	ug/L	RL (0.2)	2	NA	2
Molybdenum	ug/L	6	NC	100	100
Selenium	ug/L	2	50	NA	50
Thallium	ug/L	RL (2)	2	NA	2
Radium 226 and 228 combined	pCi/L	3.32	5	NA	5

RL = Reporting Limit

NC = No Criteria

NA = Not Applicable

Revised 12/7/18

Attachments

Table A1 – Summary of Groundwater Sampling Results (Analytical)

Figure 1 – Background Concentration Time-Series Charts

Figure 2 – Combined Background Distribution

SanitasTM Output Files

Table A1 Summary of Groundwater Sampling Results (Analytical)

Summary of Groundwater Sampling Results (Analytical) – December 2015 to May 2018

DE Karn & JC Weadock Background – RCRA CCR Monitoring Program

Essexville, Michigan

Samp	le Location:	MW-15002											
· ·	ample Date:	12/8/2015	3/28/2016	5/23/2016	8/22/2016	11/30/2016	2/22/2017	5/17/2017	8/1/2017	9/19/2017	4/9/2018	5/22/2018	
Constituent	Unit						Background						
Appendix III													
Boron	ug/L	275	22	163	79	48	133	138	205	313		69.2	
Calcium	mg/L	198	174	288	114	84.7	260	267	255	249		221	
Chloride	mg/L	1,130	773	2,140	420	260	1,470	1,970	2,290	2,270		2,020	
Fluoride	ug/L	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	
pH, Field	SU	7.0	7.0	6.6	6.9	7.2	7.0	6.8	6.9	6.9	6.7	7.0	
Sulfate	mg/L	9.63	40.3	5.25	39.8	23.4	13.1	11.5	< 2.0	< 2.0		37.8	
Total Dissolved Solids	mg/L	2,400	1,700	4,500	1,300	980	3,100	4,300	4,600	4,280		3,810	
Appendix IV													
Antimony	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	
Arsenic	ug/L	4	< 1	7	< 1	2	2	3	4.8		< 1.0	< 1.0	
Barium	ug/L	1,010	216	796	167	212	851	580	912		547	364	
Beryllium	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	
Cadmium	ug/L	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.20		< 0.20	< 0.20	
Chromium	ug/L	1	1	2	< 1	1	1	2	1.3		< 1.0	< 1.0	
Cobalt	ug/L	< 15	< 15	< 15	< 15	< 15	< 15	< 15	< 15.0		< 15.0	< 15.0	
Fluoride	ug/L	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	
Lead	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	
Lithium	ug/L	37.7	< 10	21	< 10	< 10	24	22	31		24	14	
Mercury	ug/L	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.20		< 0.20	< 0.20	
Molybdenum	ug/L	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5.0		< 5.0	< 5.0	
Radium-226	pCi/L	0.637	0.33	0.893	< 0.264	< 0.402	0.556	0.879	1.72		0.866	0.751	
Radium-226/228	pCi/L	2.047	< 0.644	2.523	< 1.05	< 0.433	2.036	2.98	4.65		2.45	2.47	
Radium-228	pCi/L	1.41	< 0.644	1.63	< 1.05	< 0.433	1.48	2.1	2.93		1.58	1.72	
Selenium	ug/L	< 1	< 1	1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	
Thallium	ug/L	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2.0		< 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.

-- - not analyzed.

Summary of Groundwater Sampling Results (Analytical) – December 2015 to May 2018

DE Karn & JC Weadock Background – RCRA CCR Monitoring Program

Essexville, Michigan

Sampl	le Location:	: MW-15008											
Sa	mple Date:	12/9/2015	3/29/2016	5/24/2016	8/23/2016	11/30/2016	2/22/2017	5/17/2017	8/2/2017	9/19/2017	4/10/2018	4/10/2018	5/22/2018
Constituent	Unit		Background										
Appendix III												Field Dup	
Boron	ug/L	236	169	176	202	204	174	187	164	183			153
Calcium	mg/L	114	126	113	114	113	107	114	108	109			111
Chloride	mg/L	292	231	246	214	192	200	149	300	329			255
Fluoride	ug/L	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000
pH, Field	SU	6.8	6.7	6.5	6.7	6.8	6.8	6.7	6.9	6.8	6.6		6.8
Sulfate	mg/L	5.15	26.7	8.6	17.9	25.6	27.7	10.1	13.4	3.9			4.3
Total Dissolved Solids	mg/L	860	720	880	730	790	760	840	866	848			744
Appendix IV													
Antimony	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	< 1.0
Arsenic	ug/L	< 1	1	1	1	1	< 1	< 1	< 1.0		< 1.0	< 1.0	< 1.0
Barium	ug/L	69	64	63	58	69	57	60	58.2		57.1	56.7	54.7
Beryllium	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	< 1.0
Cadmium	ug/L	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.20		< 0.20	< 0.20	< 0.20
Chromium	ug/L	3	2	3	2	2	1	2	1.1		< 1.0	1.1	2.0
Cobalt	ug/L	< 15	< 15	< 15	< 15	< 15	< 15	< 15	< 15.0		< 15.0	< 15.0	< 15.0
Fluoride	ug/L	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000
Lead	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	< 1.0
Lithium	ug/L	22.3	19.7	17	20	22	20	19	22		26	25	19
Mercury	ug/L	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.20		< 0.20	< 0.20	< 0.20
Molybdenum	ug/L	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5.0		< 5.0	< 5.0	< 5.0
Radium-226	pCi/L	0.481	0.546	0.411	0.32	0.444	< 0.419	0.228	< 0.937		< 0.621	< 0.420	< 0.929
Radium-226/228	pCi/L	1.531	1.42	1.611	1.96	1.454	0.826	1.45	< 1.79		< 1.26	< 1.15	2.00
Radium-228	pCi/L	1.05	0.874	1.2	1.64	1.01	0.717	1.22	< 0.848		0.795	< 0.727	1.94
Selenium	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	< 1.0
Thallium	ug/L	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2.0		< 2.0	< 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.

-- - not analyzed.

Summary of Groundwater Sampling Results (Analytical) – December 2015 to May 2018

DE Karn & JC Weadock Background – RCRA CCR Monitoring Program

Essexville, Michigan

Samp	le Location:		MW-15016											
	ample Date:	12/8/2015	3/29/2016	5/24/2016	8/22/2016	11/30/2016	2/22/2017	5/17/2017	8/1/2017	9/19/2017	4/10/2018	5/22/2018		
Constituent	Unit		Background											
Appendix III														
Boron	ug/L	490	56	472	660	435	463	491	590	602		409		
Calcium	mg/L	178	204	188	216	192	295	221	208	160		212		
Chloride	mg/L	89.7	264	91.1	93.6	83	160	110	113	99.5		82.4		
Fluoride	ug/L	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000		
pH, Field	SU	7.1	7.1	6.8	6.8	7.0	7.2	7.0	7.0	7.1	7.3	7.3		
Sulfate	mg/L	35.1	151	75	70.6	18.1	817	243	294	13.3		539		
Total Dissolved Solids	mg/L	670	1,000	900	920	840	1,700	1,100	1,090	756		1,230		
Appendix IV														
Antimony	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0		
Arsenic	ug/L	11	2	16	18	16	2	12	20.5		< 1.0	< 1.0		
Barium	ug/L	237	114	233	299	241	109	151	197		41.8	47.4		
Beryllium	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0		
Cadmium	ug/L	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.20		< 0.20	< 0.20		
Chromium	ug/L	1	1	1	< 1	< 1	2	< 1	< 1.0		< 1.0	< 1.0		
Cobalt	ug/L	< 15	< 15	< 15	< 15	< 15	< 15	< 15	< 15.0		< 15.0	< 15.0		
Fluoride	ug/L	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000		
Lead	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0		
Lithium	ug/L	31.2	16.9	33	48	28	181	88	83		120	100		
Mercury	ug/L	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.20		< 0.20	< 0.20		
Molybdenum	ug/L	6	< 5	< 5	< 5	< 5	6	< 5	< 5.0		5.4	6.5		
Radium-226	pCi/L	0.311	0.303	0.292	< 0.199	< 0.304	< 0.312	0.479	< 1.01		< 0.658	< 0.711		
Radium-226/228	pCi/L	1.581	0.75	1.402	< 1.41	1.079	0.736	0.958	< 2.34		< 1.36	< 1.48		
Radium-228	pCi/L	1.27	< 0.673	1.11	< 1.41	0.871	0.573	< 0.619	< 1.33		< 0.697	< 0.765		
Selenium	ug/L	< 1	< 1	< 1	< 1	< 1	2	1	< 1.0		1.7	1.2		
Thallium	ug/L	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2.0		< 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.

-- - not analyzed.

Summary of Groundwater Sampling Results (Analytical) – December 2015 to May 2018

DE Karn & JC Weadock Background – RCRA CCR Monitoring Program

Essexville, Michigan

Sampl	e Location:	MW-15019												
Sa	mple Date:	12/9/2015	3/29/2016	5/24/2016	8/23/2016	11/30/2016	2/22/2017	5/16/2017	8/2/2017	9/19/2017	4/9/2018	5/22/2018	5/22/2018	
Constituent	Unit		Background											
Appendix III													Field Dup	
Boron	ug/L	304	244	279	343	300	317	299	293	324		225	247	
Calcium	mg/L	171	150	179	227	154	149	146	165	155		128	137	
Chloride	mg/L	437	387	408	358	359	379	357	380	438		382	379	
Fluoride	ug/L	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	
pH, Field	SU	6.8	6.8	6.7	6.7	6.8	6.8	6.8	6.9	6.9	6.8	6.9		
Sulfate	mg/L	99.7	51.2	116	195	67.3	54.2	49.5	120	99.7		51.6	66.4	
Total Dissolved Solids	mg/L	1,400	1,100	1,300	1,300	1,100	1,200	1,100	1,250	1,200		1,080	1,120	
Appendix IV														
Antimony	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	< 1.0	
Arsenic	ug/L	< 1	< 1	1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	< 1.0	
Barium	ug/L	293	263	269	319	275	289	283	265		246	258	255	
Beryllium	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	< 1.0	
Cadmium	ug/L	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.20		< 0.20	< 0.20	< 0.20	
Chromium	ug/L	2	2	2	< 1	< 1	1	< 1	< 1.0		< 1.0	< 1.0	< 1.0	
Cobalt	ug/L	< 15	< 15	< 15	< 15	< 15	< 15	< 15	< 15.0		< 15.0	< 15.0	< 15.0	
Fluoride	ug/L	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	
Lead	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	< 1.0	
Lithium	ug/L	15.8	11	14	21	13	13	14	16		17	11	12	
Mercury	ug/L	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.20		< 0.20	< 0.20	< 0.20	
Molybdenum	ug/L	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5.0		< 5.0	< 5.0	< 5.0	
Radium-226	pCi/L	1.02	0.477	0.515	0.759	0.524	< 0.3	0.36	< 0.844		0.444	< 0.690	< 0.799	
Radium-226/228	pCi/L	1.835	1.243	1.502	1.677	1.006	1.045	1.74	< 1.57		1.03	< 1.56	< 1.59	
Radium-228	pCi/L	0.815	0.766	0.987	0.918	< 0.666	0.814	1.38	< 0.722		< 0.589	< 0.874	0.964	
Selenium	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0		< 1.0	< 1.0	< 1.0	
Thallium	ug/L	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2.0		< 2.0	< 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.

-- - not analyzed.

Table A1

Summary of Groundwater Sampling Results (Analytical) – December 2015 to May 2018

DE Karn & JC Weadock Background – RCRA CCR Monitoring Program

Essexville, Michigan

Samp	le Location:	MW-15027										
Sa	ample Date:	12/9/2015	3/29/2016	5/24/2016	8/23/2016	11/30/2016	2/22/2017	5/17/2017	8/2/2017	9/19/2017		
Constituent	Unit					Background						
Appendix III												
Boron	ug/L	208	144	181	253	169	135	178	199	223		
Calcium	mg/L	103	109	108	111	95.8	93.6	120	113	103		
Chloride	mg/L	348	285	348	293	223	225	275	386	379		
Fluoride	ug/L	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000		
pH, Field	SU	7.0	6.9	6.8	6.8	7.0	7.0	6.9	7.0	7.0		
Sulfate	mg/L	16	30.7	12.9	20.8	25.4	19.5	22.9	10.8	15.0		
Total Dissolved Solids	mg/L	800	890	980	850	790	750	910	982	968		
Appendix IV												
Antimony	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0			
Arsenic	ug/L	< 1	< 1	1	< 1	< 1	< 1	< 1	< 1.0			
Barium	ug/L	95	89	95	94	78	79	103	107			
Beryllium	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0			
Cadmium	ug/L	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.20			
Chromium	ug/L	2	1	2	1	1	1	2	< 1.0			
Cobalt	ug/L	< 15	< 15	< 15	< 15	< 15	< 15	< 15	< 15.0			
Fluoride	ug/L	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000	< 1,000		
Lead	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0			
Lithium	ug/L	27.2	21.3	21	23	20	19	23	26			
Mercury	ug/L	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.20			
Molybdenum	ug/L	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5.0			
Radium-226	pCi/L	0.386	0.461	0.485	0.359	< 0.305	0.396	0.431	< 0.878			
Radium-226/228	pCi/L	1.356	1.395	1.308	1.277	0.962	1.606	1.27	2.15			
Radium-228	pCi/L	0.97	0.934	0.823	0.918	0.706	1.21	0.836	1.56			
Selenium	ug/L	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1.0			
Thallium	ug/L	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2.0			

Notes:

ug/L - micrograms per liter.

mg/L - milligrams per liter.

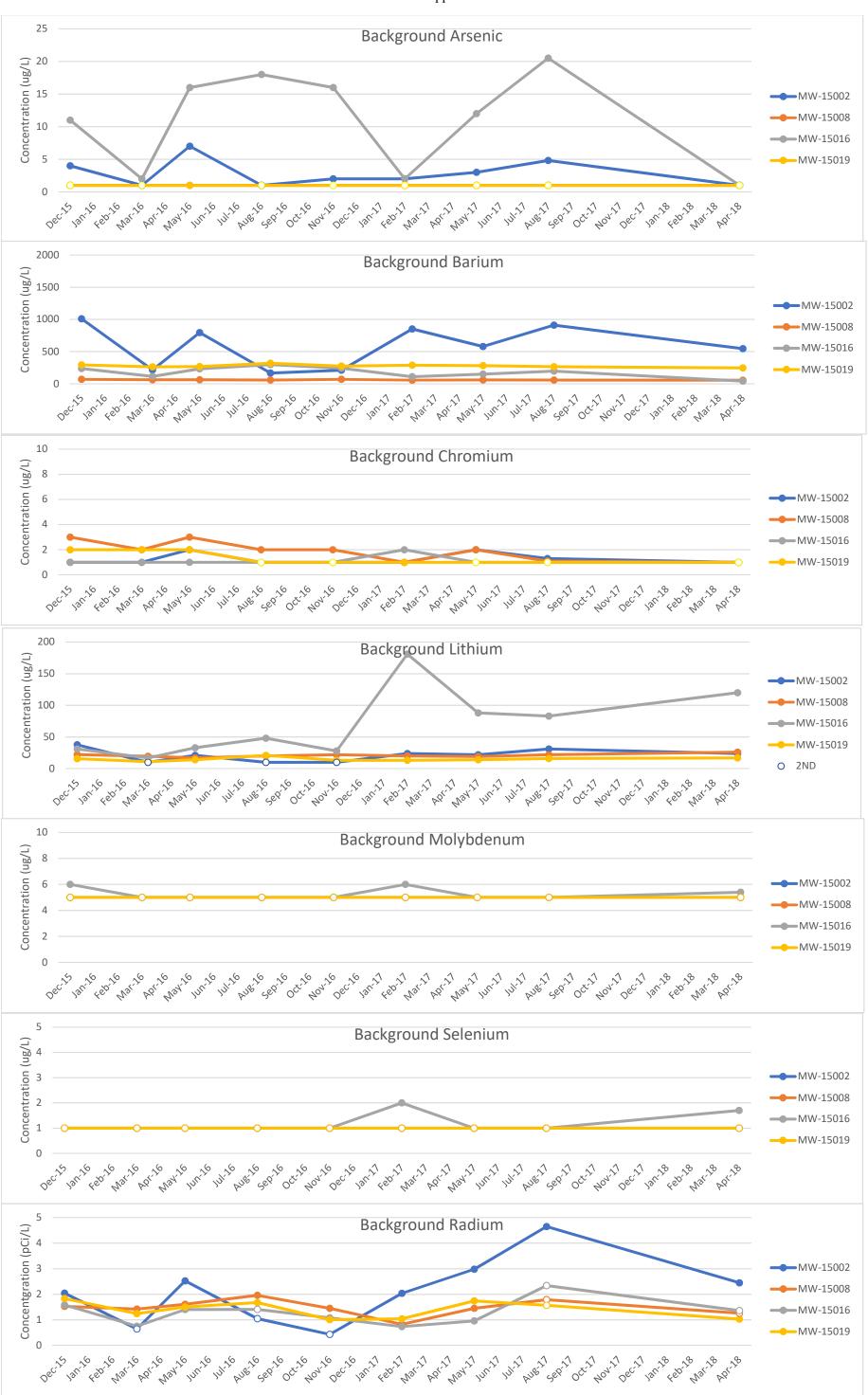
SU - standard units; pH is a field parameter.

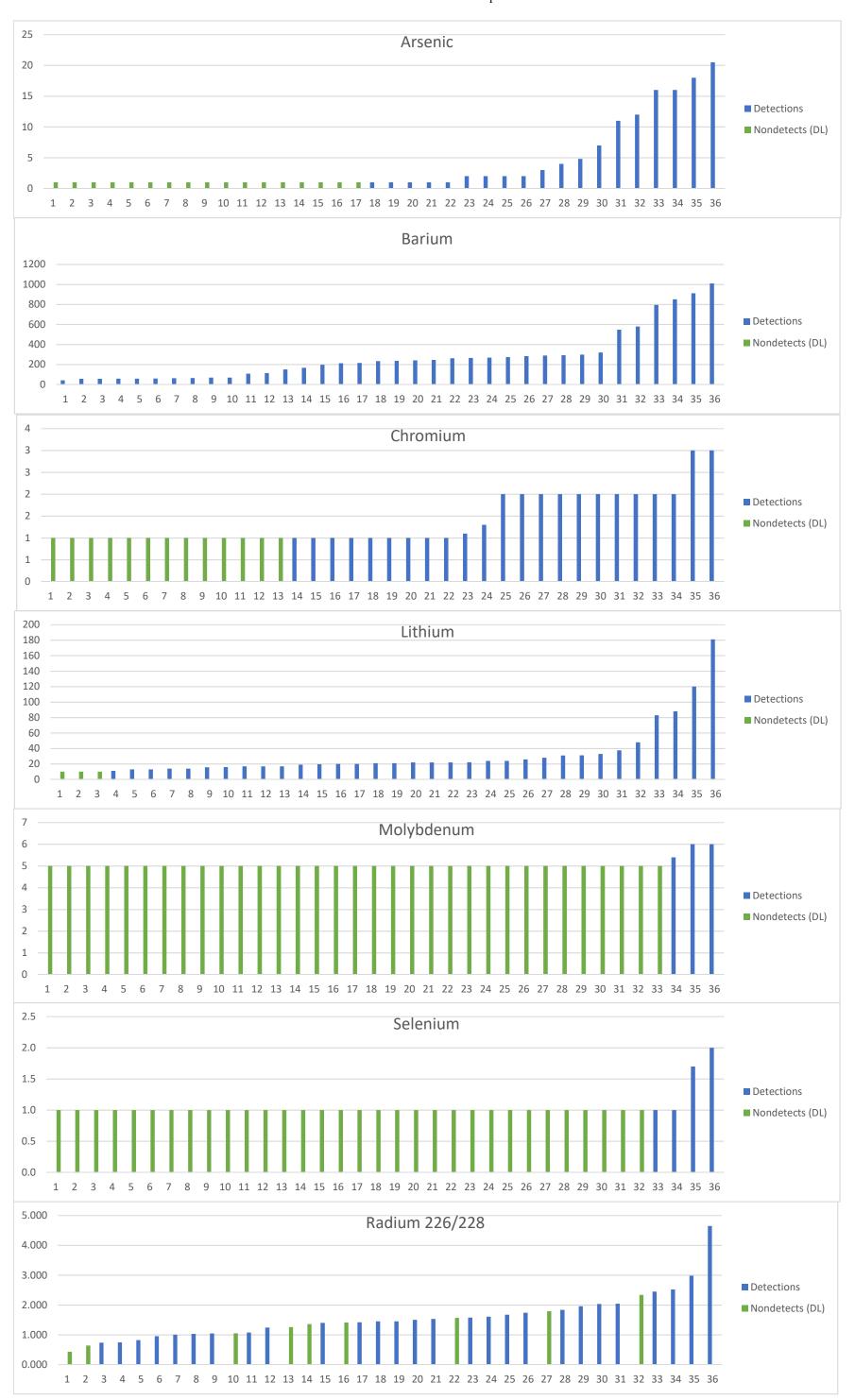
pCi/L - picocuries per liter.

-- - not analyzed.

Figures

Figure 1
Background Concentration Time-Series Charts
Karn/Weadock Site - Appendix IV Constituents



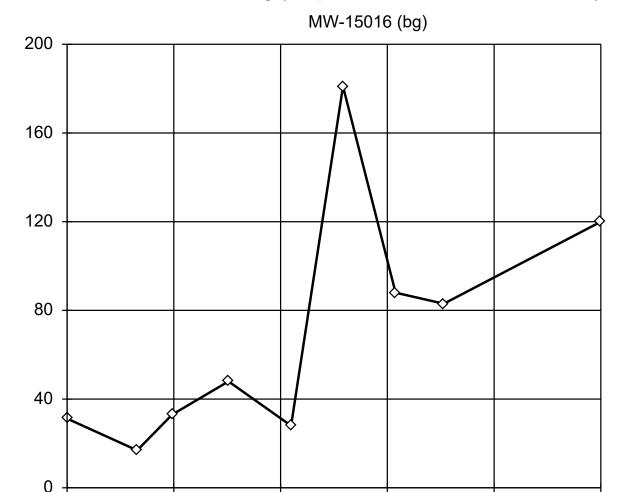


 $Sanitas^{\rm TM}\ Output\ Files$

12/9/15

5/27/16

EPA Screening (suspected outliers for Dixon's Test)



11/14/16

n = 9

Dixon's will not be run. Unable to establish suspect values. Mean 69.9, std. dev. 53.92, critical Tn 2.11

Normality test used: Shapiro Wilk@alpha = 0.1 Calculated = 0.8723 Critical = 0.859 The distribution was found to be normally distributed.

Constituent: Lithium, Total Analysis Run 8/28/2018 10:45 AM Client: Consumers Energy Data: JCW_BAP_CCR_Sanitas

5/3/17

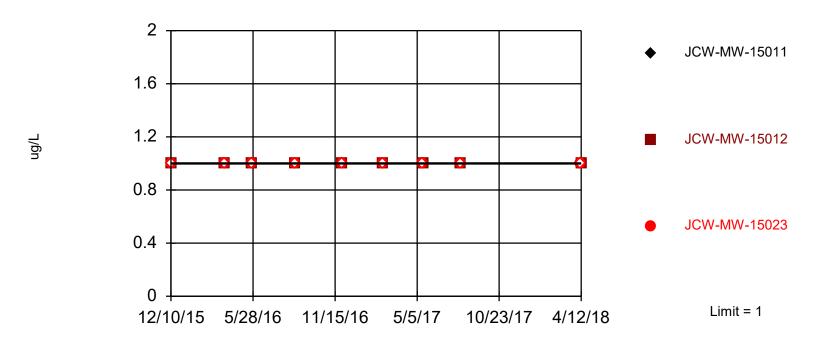
10/21/17

4/10/18

/bj

Tolerance Limit

Interwell Non-parametric



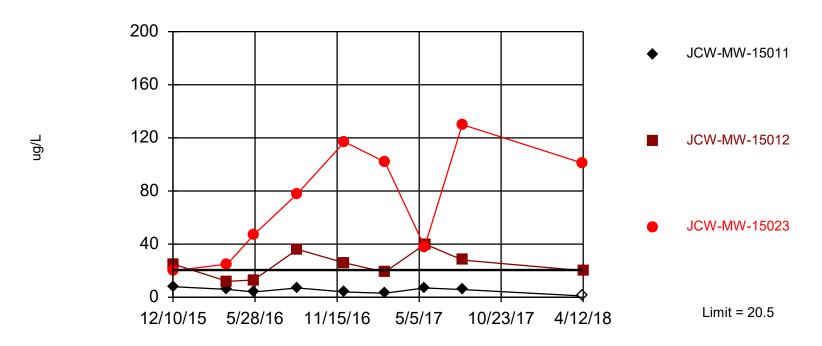
Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Most recent observation is compared with limit. All background values were censored; limit is most recent reporting limit. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Antimony, Total Analysis Run 6/12/2018 12:08 PM

Exceeds Limit: JCW-MW-15023

Tolerance Limit

Interwell Non-parametric

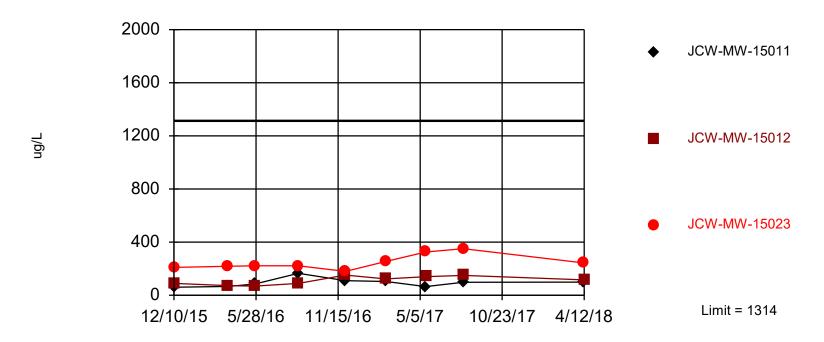


Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Most recent observation is compared with limit. Limit is highest of 36 background values. 47.22% NDs. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Arsenic, Total Analysis Run 5/24/2018 2:46 PM

Tolerance Limit

Interwell Parametric

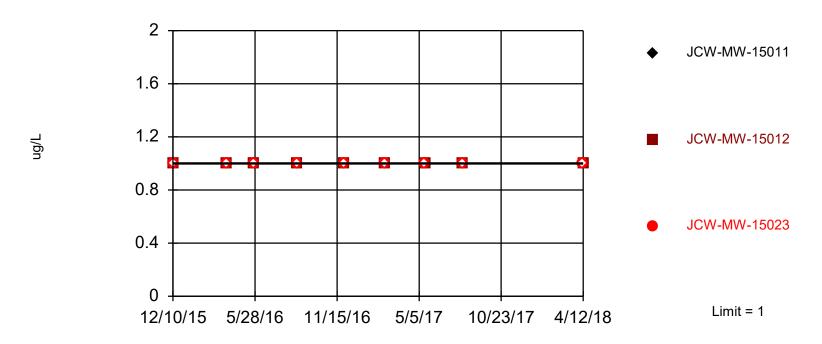


95% coverage. Most recent observation is compared with limit. Background Data Summary (based on natural log transformation): Mean=5.248, Std. Dev.=0.8953, n=36. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9227, critical = 0.912. Report alpha = 0.05.

Constituent: Barium, Total Analysis Run 5/24/2018 2:47 PM

Tolerance Limit

Interwell Non-parametric

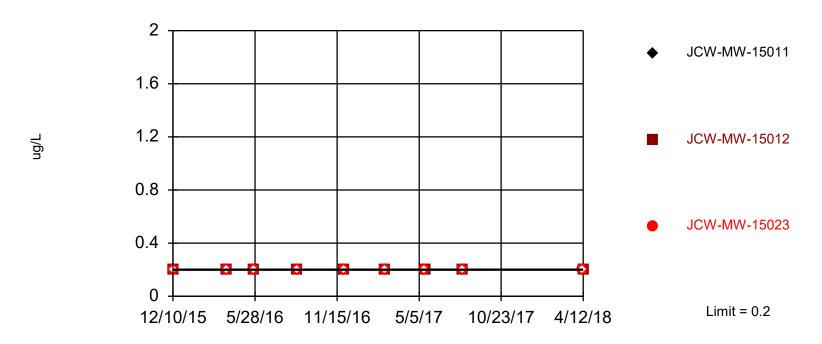


Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Most recent observation is compared with limit. All background values were censored; limit is most recent reporting limit. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Beryllium, Total Analysis Run 6/12/2018 12:09 PM

Tolerance Limit

Interwell Non-parametric

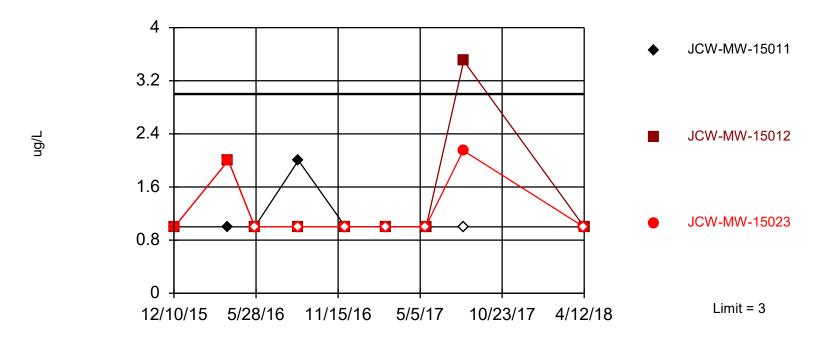


Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Most recent observation is compared with limit. All background values were censored; limit is most recent reporting limit. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Cadmium, Total Analysis Run 6/12/2018 12:09 PM

Tolerance Limit

Interwell Non-parametric

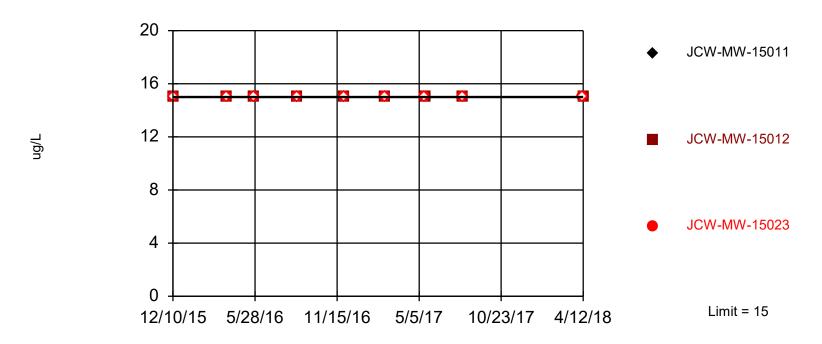


Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Most recent observation is compared with limit. Limit is highest of 36 background values. 33.33% NDs. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Chromium, Total Analysis Run 5/24/2018 2:48 PM

Tolerance Limit

Interwell Non-parametric

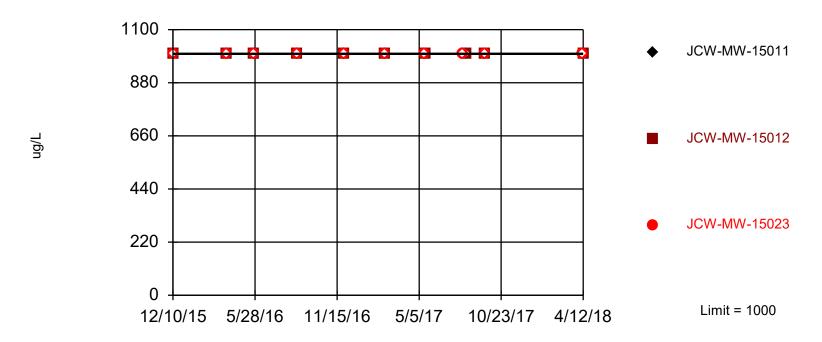


Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Most recent observation is compared with limit. All background values were censored; limit is most recent reporting limit. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Cobalt, Total Analysis Run 6/12/2018 12:09 PM

Tolerance Limit

Interwell Non-parametric

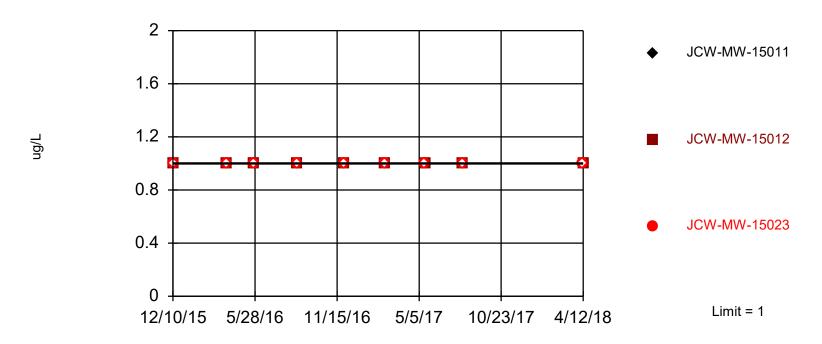


Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Most recent observation is compared with limit. All background values were censored; limit is most recent reporting limit. 89.26% coverage at alpha=0.01; 92.77% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1285.

Constituent: Fluoride Analysis Run 6/12/2018 12:10 PM

Tolerance Limit

Interwell Non-parametric

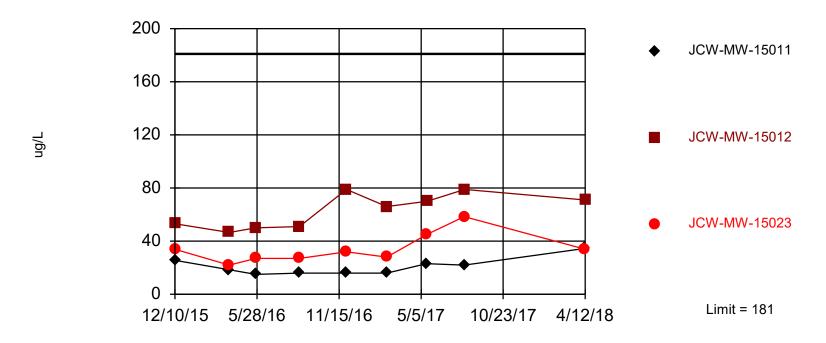


Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Most recent observation is compared with limit. All background values were censored; limit is most recent reporting limit. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Lead, Total Analysis Run 6/12/2018 12:10 PM

Tolerance Limit

Interwell Non-parametric

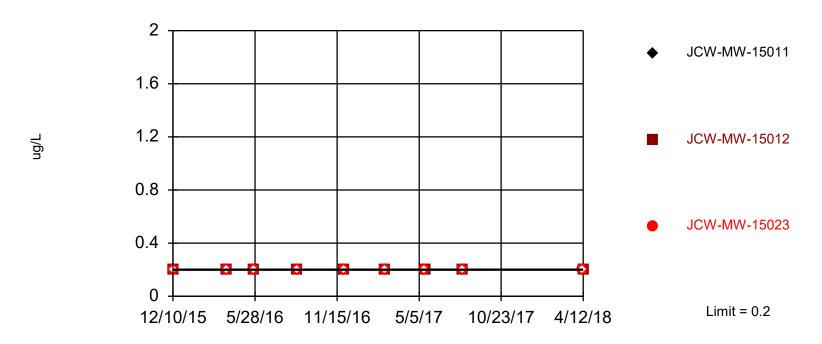


Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Most recent observation is compared with limit. Limit is highest of 36 background values. 8.333% NDs. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Lithium, Total Analysis Run 5/24/2018 2:48 PM

Tolerance Limit

Interwell Non-parametric



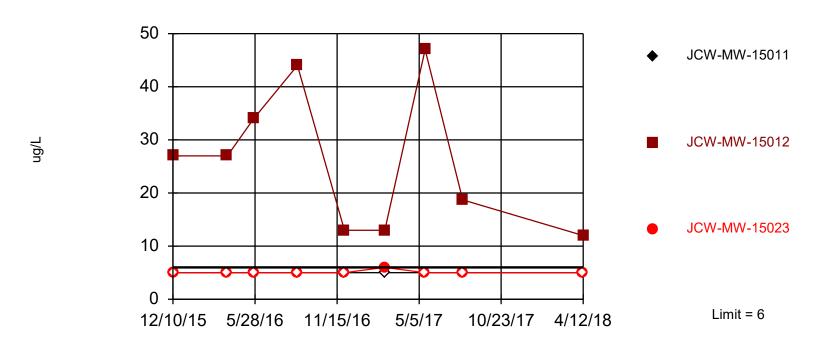
Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Most recent observation is compared with limit. All background values were censored; limit is most recent reporting limit. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Mercury, Total Analysis Run 6/12/2018 12:10 PM

Exceeds Limit: JCW-MW-15012

Tolerance Limit

Interwell Non-parametric

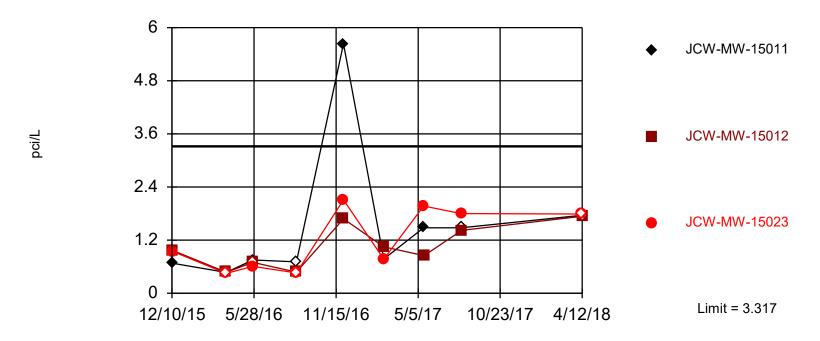


Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 75%. Most recent observation is compared with limit. Limit is highest of 36 background values. 91.67% NDs. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Molybdenum, Total Analysis Run 5/24/2018 2:49 PM

Tolerance Limit

Interwell Parametric

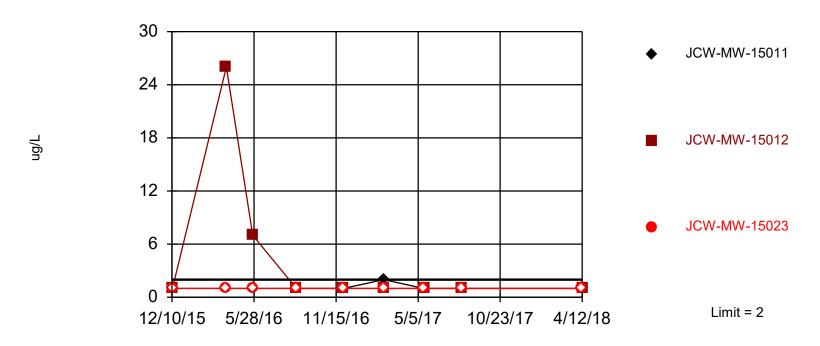


95% coverage. Most recent observation is compared with limit. Background Data Summary (based on square root transformation) (after Kaplan-Meier Adjustment): Mean=1.165, Std. Dev.=0.304, n=36, 25% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9558, critical = 0.912. Report alpha = 0.05.

Constituent: Radium-226/228 Analysis Run 5/24/2018 2:50 PM

Tolerance Limit

Interwell Non-parametric

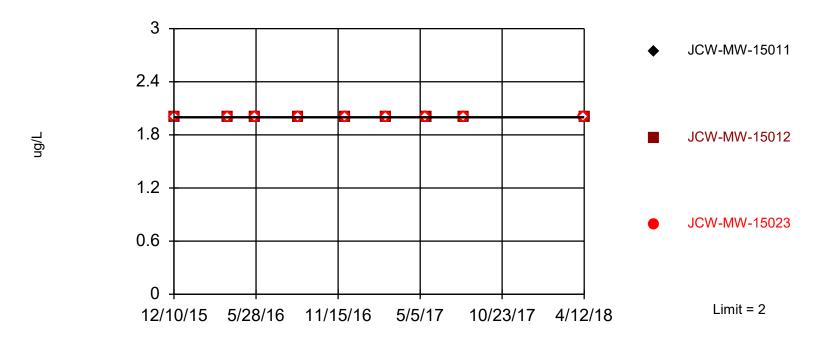


Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 75%. Most recent observation is compared with limit. Limit is highest of 36 background values. 88.89% NDs. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Selenium, Total Analysis Run 5/24/2018 2:49 PM

Tolerance Limit

Interwell Non-parametric



Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 50%. Most recent observation is compared with limit. All background values were censored; limit is most recent reporting limit. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

Constituent: Thallium, Total Analysis Run 6/12/2018 12:11 PM