

Michelle Lloyd Materials Recovery and Waste Management Division Office of Resource Conservation and Recovery Office of Land and Emergency Management

RE: DTE Electric Company Comments on Proposed Decision: Proposed Denial of the CCR Part B Alternate Liner Demonstration Application, DTE Electric, Monroe, Fly Ash Basin, Monroe, Michigan Docket ID: EPA-HQ-OLEM-2021-0283; Sent via Regulations.gov and email

Dear Ms. Lloyd:

The DTE Electric Company (DTE) respectfully submits these comments to Docket EPA-HQ-OLEM-2021-0283 in response to the U.S. Environmental Protection Agency (EPA) Proposed Denial of the CCR Part B Alternate Liner Demonstration Application for DTE Monroe Power Plant's Fly Ash Basin (Proposed Decision). DTE appreciates EPA's commitment to move the needle on the Part B applications but strongly believes that the Application should be approved based on the technical record and the attached comments. DTE has demonstrated through robust site characterization provided to the EPA and again provided in these comments, that the Fly Ash Basin complies with the requirements of the CCR rule, is not impacting groundwater within the uppermost aquifer, and has the necessary site characteristics to be eligible to perform an Alternate Liner Demonstration.

DTE acknowledges the level of effort required to make well-informed reasoned decisions and appreciates EPA's time in reviewing the vast amount of data DTE has provided. DTE welcomes the opportunity to engage in discussions with the Agency regarding their review of this response and any other comments that are received in the docket.

Thank you for considering these comments. Should you have any questions, please do not hesitate to contact me (shawn.patterson@dteenergy.com; 313-235-7720).

Sincerely,

Shawn Patterson Vice President – DTE Environmental Management and Safety

Enclosure

cc: Richard Huggins, Mary Jackson, Michelle Long, and Jason Mills

April 10, 2023

COMMENTS OF DTE ELECTRIC COMPANY ON EPA'S PROPOSED DENIAL OF THE CCR PART B ALTERNATE LINER DEMONSTRATION APPLICATION, DTE ELECTRIC, MONROE POWER PLANT, FLY ASH BASIN, MONROE, MICHIGAN

Docket ID No. EPA-HQ-OLEM-2021-0283

I. Introduction

DTE Electric Company (DTE Electric or DTE) is providing this response and comments on the U.S. Environmental Protection Agency's (EPA or Agency) proposed denial of the CCR Part B Alternate Liner Demonstration Application for the DTE Electric Monroe Power Plant Fly Ash Basin, Monroe, Michigan (Proposed Decision), EPA Docket ID EPA-HQ-OLEM-2021-0283. This proposed denial comes more than two years after DTE's application for an Alternate Liner Demonstration for the Monroe Power Plant Fly Ash Basin Coal Combustion Residuals (CCR) Unit was submitted to the Agency on November 30, 2020 (Application).

DTE has carefully reviewed the Proposed Decision and it appears that EPA did not review all of the information available to them during the time of their review, most importantly the Preliminary Alternate Liner Demonstration (PALD) report^{[1](#page-1-0)} that was submitted to EPA on November 30, 2021. DTE has also identified many relevant facts about the facility that were not considered or were misinterpreted. Lastly, the Proposed Decision goes beyond the standards for review of an application contained in the rule and EPA's guidance by (i) dismissing the certification of the Qualified Professional Engineer which provides the basis for compliance with the regulations, and (ii) introducing review criteria that do not follow the prospective nature of the application.

The Monroe Power Plant Fly Ash Basin (MONPP FAB) is an existing surface impoundment underlain by a clay-rich, consistently present, glacially compacted geologic barrier that serves as a natural liner system. DTE submitted the Application under Part $B²$ $B²$ $B²$ to pursue the

 1 Geosyntec. 2021. Preliminary Alternative Liner Demonstration, Fly Ash Basin, Monroe Power Plant. Prepared for DTE Electric Company. November.

² Hazardous and Solid Waste Management System: Disposal of CCR; A Holistic Approach to Closure Part B: Alternate Demonstration for Unlined Surface Impoundments in the Federal Register (85 FR 72506) ("Part B final rule")

opportunity to demonstrate that the natural hydrogeological conditions unique to this site meet the alternative liner requirements set forth in the rule that would allow continued operation of the unit.

The Proposed Decision overlooks the significance of the conceptual site model and the unique hydrogeological setting present at the facility with an abundance of natural clay-rich soils. These soils have a geometric mean of 2.7×10^{-8} centimeters per second (cm/s) hydraulic conductivity based on the available dataset provided in the Application. EPA acknowledges in the Part B Preamble (at 72509), natural soils are capable of achieving the required effective hydraulic conductivities lower than 1×10^{-8} cm/s and/or on a case-by-case basis may exhibit an adequate thickness of low-conductivity soil that supports having somewhat higher soil conductivities throughout the soil column. This range of hydraulic conductivity of the glacially compacted natural clay liner system is well below the threshold to be considered for an ALD as presented in the Part B Preamble (at 72509) where EPA also states "Regardless, a conductivity of 1×10^{-7} cm/s for the lowermost soil component of the liner, whether in isolation or beneath a geomembrane component, remains the absolute floor for any unit to even be considered for an alternate liner demonstration." Yet, the EPA is proposing to deny the application on the basis of having hydraulic conductivities that are too high to meet the performance standards required by Part B.

The Proposed Decision also ignores the significant amount of site-specific characterization data provided in the PALD that further confirms the conceptual site model and demonstrates that the clay is laterally continuous and is at a minimum over 14 feet thick, and as much as 34 feet thick (a minimum of greater than 4.5 times the clay liner thickness modeled in the 2014 risk assessment^{[3](#page-2-0)}). Further, several data interpretations are taken out of context to speculate various instances of potential historic non-compliance which are used as reasons to deny the Application.

EPA also inappropriately dismissed the certification of the qualified professional engineer (QPE) in finding that certain elements of DTE's groundwater monitoring program do not meet the

³ U.S. EPA. 2014. ''Regulatory Impact Analysis: EPA's 2015 RCRA Final Rule Regulating Coal Combustion Residual (CCR) Landfills and Surface Impoundments at Coal-Fired Electric Utility Power Plants.'' Prepared by the Office of Solid Waste and Emergency Response. Washington, DC. December.

requirements of the CCR rule^{[4](#page-3-0)}, even though the facility's QPE certified compliance with the requirements of the CCR rule. The CCR rule does not permit EPA to summarily reject the compliance certifications of QPEs as part of the Agency's Part B reviews. The Agency has made clear, both in the preamble of the CCR rule and the plain language of the regulatory text, that a QPE certification under the CCR rule is the regulatory mechanism for demonstrating compliance with the applicable technical standards.

Lastly, EPA's procedural implementation of the rule created a paradox that effectively foreclosed the submission of an ALD due to the passage of regulatory deadlines during EPA's extended review period. The CCR Part B Rule required the Agency to issue a final decision on an application was within 60 days of receiving a complete application per § 257.71(d)(2)(iii). The Part B rule contemplates that once an owner/operator receives approval of its application, it would proceed to submit an alternative liner demonstration by November 30, 2021 (40 C.F.R. 257.7(d)(2)(i). However, DTE did not receive the Proposed Decision until 786 days had passed – well beyond the deadline for filing an ALD. It is unclear, but EPA appears to have chosen to deny the Application in part due to lack of data while ignoring the PALD on the basis that it was received prior to approval of DTE's Application. But had DTE followed the procedure as contemplated by the rule, and had EPA approved the application, the Agency would have foreclosed the ability to submit an ALD because the deadline in 40 C.F.R. 257.71(d)(2)(i) had passed putting DTE in a situation where compliance could never legally be demonstrated.

These comments have been prepared to provide clarification and additional information to resolve EPA's comments and address uncertainties expressed by the Agency in the Proposed Decision. DTE anticipates that the additional information provided herein will be beneficial in improving the Agency's understanding of the site and trusts that the EPA reconsiders their Proposed Decision.

II. Background

DTE Energy is a diversified energy company, headquartered in Detroit, Michigan that is involved in the development and management of energy-related businesses and services nationwide. Our operating units include an electric utility (DTE Electric) and a natural gas utility (DTE Gas) which provide electric and/or gas services to residential, business and

⁴ Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities in the Federal Register (80 FR 21301) ("CCR rule")

industrial customers throughout Michigan. The DTE portfolio also includes non-utility energy businesses focused on industrial energy services, renewable natural gas, and energy marketing and trading.

DTE Electric has enjoyed powering homes and businesses in Southeastern Michigan for well over a century. DTE Electric is the largest electric utility in Michigan and one of the largest in the nation, generating and distributing electricity to 2.3 million residential, commercial and industrial customers. With an approximately 11,840-megawatt system capacity, DTE uses coal, nuclear fuel, natural gas, hydroelectric pumped storage and renewable sources to generate its electrical output for the benefit of its customers. DTE Electric owns and operates approximately 31,000 miles of overhead distribution lines and 16,000 miles of underground distribution lines to a service territory that spans 7,600 square miles.

The MONPP is a 3,066 MW (summer rated capacity) coal-fired power plant located in Monroe County. Monroe, which has four units in total, is the fourth largest coal-fired power plant in the United States and represents approximately 30% of the DTE Electric's generation energy mix.

The MONPP FAB consists of a 331-acre CCR surface impoundment, and a 79-acre dry CCR landfill on top of a portion of the impoundment. The FAB was constructed from 1973 to 1974 and the entire footprint (410-acres) has been utilized to store sluiced CCR and treat fly ash transport water to meet the requirements of the National Pollutant Discharge Elimination System (NPDES) permit before discharging into Lake Erie. In July 2015, DTE received a permit to construct the Landfill in the north-western quadrant of the site and started receiving dry CCR prior to the effective date of the CCR rule. Both the Landfill and the FAB surface impoundment operate under the same Solid Waste Operating License issued by the Michigan Department of Environment, Great Lakes, and Energy (EGLE). Groundwater at the FAB has been monitored in accordance with EGLE approved monitoring plans since the mid-1990s.

In 2020, Michigan's solid waste statute was amended to align with the federal CCR rule, including a groundwater monitoring program. Amendments to the monitoring system were made to align with the State solid waste rules/statutes, and a new Solid Waste Operating License was issued by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) that approved the current groundwater monitoring network. DTE continues to operate and maintain the MONPP FAB in accordance with the operating license and solid waste

statutes/rules. Documents demonstrating DTE's compliance with applicable State solid waste rules and the CCR rule are posted on DTE's CCR rule compliance data and information website^{[5](#page-5-0)}, and/or in the facility operating records. This includes documents required to be certified by QPEs consistent with the self-implementing nature of the CCR rule.

A. History of Conceptual Site Model

The MONPP FAB was constructed in the mid-1970s. Over the past 50 years, DTE has performed many geologic studies and reviewed publicly available regional reports to characterize the site hydrogeological conditions, develop the conceptual site model, and support demonstrations that DTE has made to state regulators and now to the EPA, regarding the site-specific geology and the appropriateness of the groundwater monitoring program prepared consistent with applicable State and Federal regulations. In addition, DTE has had a groundwater monitoring system in place, and has performed groundwater monitoring at the MONPP FAB since the mid-1990s, well before the CCR rule was established, and monitoring data collected has showed continued compliance with applicable regulations and inform the Application and this response. Some noteworthy studies and key reports include:

- A regional study of the entire Monroe County done by Andrew Mazola and Titled "Geology for Environmental Planning in Monroe County". Information from this report was utilized by DTE to inform the development of the site conceptual model, and to support the development of the Application.
- A 1971 report by Soil and Foundation and Associates titled "Plum Creek Property Proposed Flyash Settling Basin" containing approximately 100 soil boring logs and fence diagrams. This report predated any solid waste regulation of ash disposal facilities by the State of Michigan. Information from this report was utilized by DTE to inform the development of the site conceptual model, and to support the development of the Application.
- A 1980 report by DTE titled "Hydrogeologic Report Monroe Ash Basin" summarizing the above two reports and providing additional data and interpretation. This report was required by the 1977 amendments to the Michigan Solid Waste Rules. Those rules

⁵ https://www.dteenergy.com/us/en/residential/community-and-news/environment/coal-combustion-residualrule-compliance-data-and-information.html

required an investigation of geology and a determination of whether groundwater monitoring was necessary. The 1980 report concluded that the presence of clay soils obviated the need for groundwater monitoring. Information from this report was utilized by DTE to inform the development of the site conceptual model, and to support the development of the Application.

- A 1995 report titled "Monroe Power Plant Effectiveness of Clay as a Natural Barrier Onsite Ash Disposal Basin" and accompanying time of travel calculations that responded to additional changes to the Michigan Solid Waste Management Rules. The changes to the rules required another review of the 1980 determination that groundwater monitoring was not necessary. The 1995 Detroit Edison (now DTE) report and accompanying information that included information from the previous 1971 and 1980 reports requested a continued waiver of bedrock groundwater monitoring. This report was included in the Application.
- A 2018 report by TRC titled "Natural Clay Liner Equivalency Evaluation Report" that used information from regional geologic reports and existing site data to assess whether the natural soils below 6 CCR surface impoundments one of which was the FAB are performing equivalently to a composite liner using recognized and generally accepted good engineering practices. The report concluded that the natural clay liners at each of the evaluated sites are more protective than a single composite liner system and meet the RCRA protectiveness standard "does not pose a reasonable probability of adverse effects on health or the environment." This report was included in the Application.
- The 2021 PALD report by Geosyntec, prepared in accordance with § 257.71(d)(1)(ii), is the latest in a long series of demonstrations executed by DTE that concludes the natural clay liner present beneath the FAB is one of the several types of natural soil liners described by EPA in the Part B Preamble that is naturally protective, as it has undergone glacial compaction and achieves a sufficiently and consistently low hydraulic conductivity that effectively controls leachate within the FAB across the entire site. More than 100 additional boring locations were investigated as part of this demonstration, a rigorous laboratory study was implemented, lasting nearly two years, and a robust mathematical model developed in accordance with the requirements of the Part B rule that further reduces any uncertainty in the heterogeneity of the natural clay liner present at the site. The PALD is a substantially complete demonstration, but preliminary due to the long

time it takes to conduct the ASTM D7100 laboratory testing, which is due to the significantly low-conductivity nature of the clay that can take up to well over a year to reach the termination criteria. Consistent with previous investigations and studies performed at the site, the PALD concludes that the underlying natural clay liner is continuously present across the site and meets the protectiveness standard of RCRA Subtitle D, and more specifically there is no reasonable probability that water from the FAB will cause releases to groundwater that will exceed the groundwater protection standards (GWPS) at the waste boundary over the projected active life of the unit. DTE submitted the PALD to EPA on November 30, 2021, in accordance with § 257.71(d)(1)(ii), well in advance of the Proposed Decision, however, based on the Agency's comments, it does not appear that EPA reviewed the content of the demonstration. A copy of the PALD is included in this letter as Attachment A.

- The 2023 Final ALD prepared by Geosyntec. Since the submittal of the PALD, the analysis of the hydraulic conductivity compatibility samples required under § 257.71(d)(1)(ii)(B)(*2*) were terminated in December 2022 after running for almost two years due to the very low hydraulic conductivity of the samples. To that end, DTE is providing the updated final ALD as an attachment to this response, and summarizing to provide the additional technical details from the ALD. The results from the final ALD are also incorporated below in this response to further address the uncertainty and misunderstanding expressed by EPA in the Proposed Decision. A copy of the final ALD is included in Attachment B.
- Finally, in 2022/2023, DTE performed a supplemental aquifer characterization investigation to further characterize the site conditions and aquifer properties using a combination of groundwater geochemical, stable isotope, and radiogenic isotope analysis. This characterization also included an in-depth analysis of existing site data collected through 2022 from the MONPP FAB CCR unit. The "Additional Uppermost Aquifer Characterization Study" (Aquifer Characterization Study) performed by TRC that provides even more site-specific data that supports the conceptual site model for the site and further upholds the underlying premise that the aquifer remains unaffected by the FAB and has remained as such over the active life of the FAB. The Aquifer Characterization Study further substantiates site compliance and the efficacy of the Alternate Source Demonstration (January 20, 2020, submitted to EPA in the Application) and further demonstrates the protectiveness of the natural clay liner through a series of

in-depth geochemical and isotopic data analysis, including general chemistry, ionic speciation, mineral saturation, stable and radiogenic isotopes in combination with advanced statistical analysis that affirmatively demonstrates that the uppermost aquifer is not in communication with the CCR unit water, groundwater geochemistry in the uppermost aquifer is reflective of the geogenic natural environmental conditions, and is therefore unaffected by the MONPP FAB CCR unit. A copy of the Aquifer Characterization Study is included in Attachment C of this letter.

In summary, DTE has been monitoring the MONPP FAB for decades, and has amassed extensive subsurface data to evaluate the long-demonstrated effectiveness of clay underlying the MONPP FAB. The significant amount of site characterization data substantiates that the uppermost aquifer remains unaffected and demonstrates the protectiveness of the glacially compacted natural clay liner system.

Since promulgation of the 2015 CCR rule, with active involvement and required certifications from QPEs, DTE evaluated siting and design requirements, confirmed that the unit is structurally sound, conformed to the operating criteria, established groundwater monitoring networks, statistical plans, as required by the self-implementing CCR rule. Many of these requirements enacted under the CCR rule were already being implemented in cooperation with state regulators as part of ongoing state program compliance.

DTE continues to operate its CCR units in a manner that meets or exceeds all State and Federal requirements. DTE developed and manages a CCR program that is both protective of human health and the environment, and compliant with the requirements of the CCR rule as they are written, in the context of the unique site-specific conditions at MONPP.

III. Part B Purpose and Intent

The Part B rule was designed to allow a limited number of facilities with environmentally protective and impermeable hydrogeological characteristics to demonstrate that their existing naturally clay-lined systems perform as well as, or better than composite liner systems to ensure there is no reasonable probability of adverse effects to human health and the environment. The 2015 CCR rule was developed as a one-size-fits-all program that did not originally contemplate forced closure for units with naturally occurring conditions that are as protective as synthetically lined CCR surface impoundments. This changed with promulgation

of the Part A rule as a result of the 2018 DC Circuit Court USWAG decision^{[6](#page-9-0)}. Consequent, this could have resulted in unnecessary closure or retrofitting of protective natural clay lined surface impoundments where there is no reasonable potential for migration of CCR constituents to groundwater due to the natural subsurface conditions. The Part B amendment offers a modification to the CCR rule to account for these uncommon and unique, yet protective, circumstances by including a procedure for facilities to request approval to operate an existing CCR surface impoundment with an alternate natural clay liner.

Additionally, the 2015 CCR rule was also designed to be self-implementing, requiring certification from qualified professional engineers (QPEs) and, in some cases, state regulatory agencies, in place of direct oversight from EPA. As a result, the groundwater monitoring requirements had to be universally applied to all facilities subject to the CCR rule, including establishment of monitoring programs for surface impoundments at facilities with unique hydrogeological conditions that do not necessarily meet the "one-size fits all" monitoring standards of the CCR rule, void of any dialogue with the EPA. While not common, several of these sites with natural clay liners may be otherwise eligible for a no-migration demonstration under other state-administered or federal RCRA programs. This is the case for the MONPP FAB.

The Part B amendment offers a modification to the CCR rule to account for these uncommon and unique, yet protective, circumstances by including a procedure for facilities to request approval to operate an existing CCR surface impoundment with an alternate natural clay liner. The Part B rule provides a means to allow sites under these special conditions to continue to operate while being protective of human health and the environment. EPA recognizes with the enactment of Part B that the potential exists for facilities to successfully demonstrate that naturally compacted clay can serve as a protective liner system under certain conditions. The purpose of the Part B application (step 1) is to provide the necessary site information under the rule to show the facility exhibits these unique circumstances. An approved Part B application affords the opportunity to make the robust alternate liner demonstration (ALD) (step 2) by performing a significant amount of field investigation and data analysis to confirm that the continued operation of the unlined surface impoundment presents no reasonable

⁶ Util. Solid Waste Activities Grp. V. EPA, 901 F.3d 414 (D.C. Cir. 2018)

probability of adverse effects to human health or the environment within the operational life of the CCR unit.

IV. Groundwater Has Not Been Impacted by the MONPP FAB

DTE is confident that the MONPP FAB groundwater monitoring program appropriately considers the site specific hydrogeologic conditions present at the site and accurately represents the quality of groundwater passing the downgradient boundary of the unit. The data provided to EPA in the Application met the requirements of the rule, and clearly show that the FAB groundwater monitoring program appropriately remains in detection monitoring. To align the groundwater monitoring program with the conceptual site model, the basis of the groundwater monitoring program hinges on the key premise that the uppermost aquifer has not been affected by operation of the FAB. This approach is substantiated with data that is further discussed in these comments.

DTE implemented an Aquifer Characterization Study (Attachment C) to further characterize the site conditions (including separation of the uppermost aquifer from the FAB) and aquifer properties using a combination of geochemical, stable isotope, and radiogenic isotope analysis, with additional in-depth analysis that provides even more site-specific data that supports the conceptual site model for the site and further upholds the underlying premise that the uppermost aquifer is not in communication with the FAB and remains unaffected and has remained as such over the active life of the FAB. The Aquifer Characterization Study further substantiates site compliance and the efficacy of the Alternate Source Demonstration (January 20, 2020) and further demonstrates the protectiveness of the natural clay liner.

The Aquifer Characterization Study demonstrates a distinct difference in chemical compositions between the groundwater underlying the unit, the pore water in contact with ash within the unit, and the surface water in the surrounding nearby surface water bodies. Fundamentally, groundwater chemistry is influenced by the various minerals and gases that are available to react with the water as it travels through the subsurface – through pores and fractures in rock or sediment. Their mere presence in groundwater does not indicate that a release from the CCR unit has occurred. The results of the Aquifer Characterization Study demonstrate with additional site-specific and quantifiable evidence that the uppermost aquifer has not been impacted by the operation of the FAB since operations

began nearly 50 years ago, and that the source of the constituents observed in the uppermost aquifer are geogenic in nature.

The uppermost aquifer, as defined in 40 CFR §257.53, underlying the MONPP FAB consists of saturated limestone present beneath a thick contiguous glacially compacted natural clay liner system^{[7](#page-11-0)} that serves as a natural confining hydraulic barrier that isolates the underlying uppermost aquifer. At its deepest incised area, the FAB has a minimum of 14 feet of glacially compacted natural clay separating the bottom of the FAB from the uppermost aquifer. Near the north end of the FAB where the hydraulic gradient is steeper, the clay is at least 34 feet thick. The overlying low-permeability glacially compacted natural clay liner system that separates the FAB from the uppermost aquifer has a hydraulic conductivity of 3.3 x 10⁻⁹ cm/s to 1.0 x 10^{-[8](#page-11-1)} centimeters per second (cm/s)⁸ exceeding the requirements of the design criteria for the lower component of a composite liner. These hydrogeological characteristics align with the types of natural liners described in the Part B Preamble (at 72509) that EPA believes have the potential for facilities to successfully demonstrate that naturally compacted soil can be protective, one of which has undergone glacial compaction, "whereby stress from the weight and flow of the glacier compressed the naturally occurring soil". The lateral continuity, thickness, and consistently low permeability of the glacially compacted natural clay liner system underlying the FAB make this facility well qualified for a Part B demonstration.

The PALD, the final ALD and the Aquifer Characterization Study provide additional detailed site information that further substantiates the conceptual site model at the site and the ASD, and further verifies that the FAB has not impacted groundwater. The FAB qualifies for an ALD Application approval because continued compliance with the groundwater requirements set forth in §§ 257.93 through 257.94 is demonstrated, and the basin remains in detection monitoring in accordance with the provisions under § 257.71(d)(1)(i)(B)(*2*), as discussed at length throughout this response.

 $⁷$ The continental glaciers over Michigan were about one-mile thick. https://www.noaa.gov/education/resource-</sup> collections/freshwater/great-lakes-ecoregion dated February 1, 2019

⁸ April 2023 final ALD page 3-3

V. The QPE's Certification was Wrongly Dismissed

The CCR rule is self-implementing in most states, including Michigan, and relies on QPE certification from qualified engineering practitioners to ensure compliance with the regulations. The aspects of the CCR program that require certifications are explicitly stated throughout the CCR rule. Certification of compliance is to be determined by a qualified professional utilizing site specific data. For example, the design of the monitoring system relies on site specific information and defers to PE certification for approval. 40 C.F.R. § 257.91(f) requires "[t]he owner or operator must obtain a certification from a qualified professional engineer stating that the groundwater monitoring system has been designed and constructed to meet the requirements of this section." That certification provides the means for compliance with 40 C.F.R. § 257.91(f).

EPA inappropriately proposes to find that elements of DTE's groundwater monitoring program do not meet the requirements of the CCR rule, even though the facilities' QPE certified compliance with the requirements of the CCR rule. The CCR rule does not permit EPA to summarily reject the compliance certifications of QPEs as part of the Agency's Part B reviews. While it is possible that a technical disagreement between EPA and the QPE may result in future modifications to a facility's operations, this disagreement cannot be the basis for finding that an owner/operator is not in compliance with applicable CCR rules, when they have relied upon a QPE certification in accordance with the CCR rule. This is because reliance on a QPE certification is how, pursuant to the CCR rule, a facility is required to demonstrate compliance.

The Agency has made clear, both in the preamble of the CCR rule and the plain language of the regulatory text, that a QPE certification under the CCR rule is the regulatory mechanism for demonstrating compliance with the applicable technical standards. The Part B rule did not change this regulatory framework and there is no requirement that EPA independently review a facility's compliance. Rather, the rule clearly places the burden on the applicant to demonstrate compliance. DTE has made this demonstration by submitting certain documentation to EPA, including a certification stating that the facility is in compliance. If the rule required EPA to independently evaluate all technical materials, there would be no reason to require this compliance certification in the first instance. By submitting the required documentation, the regulatory presumption is that the facility is in compliance.

To be clear, DTE is not claiming that EPA does not have statutory authority to enforce the CCR rule. That authority was clearly granted to the Agency in 2016 with the passage of the Water Infrastructure Improvements for the Nation ("WIIN") Act. But the WIIN Act did not change the rule's framework for demonstrating compliance through QPE certifications. Nor are EPA's Part B reviews done pursuant to its enforcement authority under RCRA § 3008. In fact, EPA explicitly stated that the Part B compliance determinations are made solely for purposes of Part B demonstrations and are not relevant in any other context. Thus, until EPA successfully pursues enforcement against a facility under its § 3008 enforcement authority, a facility cannot be found in noncompliance when it has obtained the requisite compliance certification from a QPE.

Again, while subsequent disagreement between EPA and the QPE may result in the facility possibly amending certain CCR compliance plans or documents, it cannot be the basis for finding a facility in noncompliance with the applicable standards without an adjudication made through the statutory enforcement process. And even if, for purposes of argument, EPA could overrule the compliance certification of a QPE, EPA must have a rational basis for doing so. EPA's obligation to engage in reasoned decision-making demands more than simply asserting, without pointing to any specific error by the QPE, that the facility is not in compliance with the CCR rule.

VI. The Part B Rule Contains Timelines for Implementation That Were Not Followed Depriving DTE of an Opportunity for Meaningful Consideration of Its Application and the Ability to Submit an ALD

The CCR Part B Final Rule was published on November 12, 2020 and provided applicants only 18 days (November 30, 2020) to submit a completed application, for facilities to request approval to use an alternate liner for CCR surface impoundments per 40 C.F.R. § 257.71(d). 40 C.F.R. § 257.71(d)(2)(iii)(C) states that "EPA will publish a proposed decision on complete applications in a docket on *www.regulations.gov* for a 20-day comment period. After consideration of the comments, EPA will issue its decision on the application within sixty days of receiving a complete application." An applicant must submit its demonstration by November 30, 2021.

DTE submitted its Application on time on November 30, 2020 and received notification only that the Application was administratively complete on January 11, 2022 – 6 weeks after the regulatory requirement for submission of an ALD. The letter did not extend the deadline for ALD submissions beyond the 2021 deadline, so unless an owner/operator preemptively submitted a demonstration without approval, EPA had foreclosed the opportunity to do so.

In an attempt to preserve its right to file an ALD, DTE submitted an extension request on September 1, 2021, and an update to the extension request on September 1, 2022, under 40 C.F.R. § 257.71(d)(2)(ii)(A). EPA never responded to the extension requests, and therefore, the preliminary results of the demonstration were submitted to EPA on November 30, 2021, as required by 40 C.F.R. § 257.71(d)(2)(ii). In addition to fulfilling the requirements of the alternate liner demonstration under 40 C.F.R. § 257.71(d)(1)(ii), the PALD included important information to support DTE's application, but for reasons unknown to DTE, it was not considered in the Proposed Decision.

In EPA's January 11, 2022 completeness determination letter, the Agency states that the Application contains sufficient information for the Agency to evaluate the merits of the Application. However, EPA has proposed to deny the Application, in part on the basis that the Application did not provide sufficient information, which is contradictory to the completeness determination. Additionally, 40 C.F.R. § 257.71(d)(2)(iii) states that "EPA will evaluate the application and may request additional information not required as part of the application as necessary to complete its review." Much of the information EPA suggests is missing is included in the PALD and could have been referenced during EPAs extended review period. Moreover, DTE would have welcomed the opportunity to provide additional information.

DTE is providing an update to the PALD (the final ALD) through this comment package as Attachment B to emphasize the relevancy of the comprehensive site characterization in the Agency's final decision-making. The final ALD includes updated analytical data from compatibility tests that were ran through December 2022 which were used to confirm that the model results in the PALD are accurate. The final ALD continues to demonstrate that there is no reasonable probability that water from the FAB will cause an exceedance of the groundwater protection standards outside of the basin.

VII. Active Life of the Fly Ash Basin

In order for the Monroe Power Plant to continue operation and provide electric service to Southeast Michigan, the FAB must continue to receive sluiced fly ash until such time that the four generating units at the power plant are converted to a dry fly ash handling system. Notwithstanding the exhaustive studies and data referenced herein demonstrating that the FAB has not impacted groundwater, DTE is diligently pursuing the implementation of the dry fly ash conversion with the last unit expected to complete the conversion in the fall of this year. Specifically, conversions are expected to occur in accordance with the following schedule: Unit 2 is complete, Unit 1 is underway, Unit 3 in Spring 2023, and Unit 4 Fall 2023. DTE is progressing through detailed engineering design for the Fly Ash basin closure, with dewatering pilot studies anticipated to begin this year progressing into full scale dewatering of the unit in 2024.

VIII. Demonstrated Compliance with the CCR rule

DTE has prepared the following discussion to further highlight the hydrogeological characteristics that make this facility uniquely qualified for a Part B demonstration. The information presented below demonstrates that compliance with the rule has been and continues to be met at the FAB and is meant to provide additional clarification to help resolve any misinterpretations or uncertainties expressed by the Agency in the Proposed Decision to deny the Application.

A. Documentation of Groundwater Monitoring Network Compliance

In the Proposed Decision, EPA stated that the information required under 40 C.F.R. § 257.71(d)(1)(i)(B)(*1*) is not included in the Application [Proposed Decision, p. 9]. The design and placement of the monitoring well network is well-documented in the Application and provides a narrative on pages 9 and 10 in the Application that speaks to the well network design along with supporting information and reports detailing the established monitoring well network in Appendix B. Additional supporting information regarding well locations, site geology (including the continuous presence of a glacially compacted natural clay liner system underlying the FAB), and groundwater flow potential are provided in Figures 2 through 10 of the Application. The information and narrative provided in the Application along with the QPE certification of the well network complies with 40 C.F.R. § 257.91 and demonstrates a

thorough understanding of site hydrogeology and the potential for the impoundment to impact the groundwater flow.

The information provided in the application includes all of the following information required under 40 C.F.R. § 257.71(d)(1)(i)(B)(*1*) as follows:

- Map(s) of groundwater monitoring well locations in relation to the CCR unit(s) that depict the elevation of the potentiometric surface and the direction(s) of groundwater flow across the site;
	- ― Provided in the Application Figures 6-10 Groundwater Potentiometric Surface Maps from September 2017 through September 2019, and additionally in the 2017 through 2019 Annual Groundwater Monitoring Reports in Application Appendix C, D, and E);
- Well construction diagrams and drilling logs for all groundwater monitoring wells;
	- ― Provided in Application Appendix B Groundwater Monitoring Systems Summary Report;
- Maps that characterize the direction of groundwater flow accounting for temporal variations;
	- ― Provided in the Application Figures 6-10 Groundwater Potentiometric Surface Maps from September 2017 through September 2019, and additionally in the 2017 through 2019 Annual Groundwater Monitoring Reports in Application Appendix C, D, and E); and
- Any other data and analyses the owner or operator of the CCR surface impoundment relied upon when determining the design and location of the groundwater monitoring network.
	- ― Several key historical reports relied upon to develop the monitoring network are included in the Application in Appendix K – Effectiveness of the Underlying Clay Soil as a Natural Barrier On-Site, Ash Disposal Basin, Monroe Power Plant Technical Report, Detroit Edison Design Engineering, 1995, and Appendix N – Historic Groundwater Artesian Conditions Documentation.

1. Monitoring System Meets 40 C.F.R. § 257.91(a)(1)

The monitoring network meets the performance standard set forth in 40 C.F.R §257.91(a)(1)(ii). 40 C.F.R § 257.91(a)(1) does not explicitly require that all background concentrations be established in hydraulically upgradient wells. Similar to both the Subtitle C and Subtitle D RCRA regulations that have been implemented for years, the CCR Rule allows for a determination that background quality may include sampling of wells not hydraulically upgradient of the waste management area. Specifically, 40 C.F.R § 257.91(a)(1)(ii) allows the determination of background using wells that are not hydraulically upgradient of the CCR management area that "provide an indication of background groundwater quality that is as representative or more representative than that provided by the upgradient wells." As such, 40 C.F.R § 257.91(a)(1)(ii) is inclusive of situations where intrawell analysis is appropriate and accounts for the use of downgradient wells to determine background. The reasoning that the background at the downgradient wells is more representative than the upgradient wells ties into the same reasoning that intrawell methods are appropriate at the site. This has to do largely with the spatial variability observed throughout the well network, in combination with the extremely long travel times for groundwater to flow across the base of the CCR unit. A more thorough discussion of the reasoning is provided below in Section VIII.B.1.a.

EPA states that "[t]he CCR regulations require development of a groundwater monitoring network that will identify the background level of contamination in the uppermost aquifer upgradient of a CCR unit, so that those levels can be compared with the contaminant levels in the wells downgradient of the CCR unit after the groundwater has flowed beneath it. *See* 2015 CCR rule preamble at 80 FR 21302, 21399-400."[9](#page-17-0) While it is well understood that the purpose of detection monitoring is to assess background groundwater quality and use it to compare to groundwater quality after it has passed beneath the CCR unit, we cannot corroborate EPA's reference to the Preamble that implies all upgradient groundwater is contaminated and that the purpose of monitoring is to compare the difference in contamination levels in up- and downgradient wells. Although that may be the case in some instances where there are other sources impacting groundwater quality prior to

⁹ Proposed Decision, p. 11.

passing beneath the CCR unit, EPA's assumption that all groundwater being monitored is "contaminated" is overstated. In contrast, the EPA's Unified Guidance states that "[u]nits under detection monitoring are initially presumed not to be contributing a release to the groundwater unless demonstrated otherwise."[10](#page-18-0)

From the onset of monitoring at the FAB, a myriad of data from historical site information, regional water quality, and more recent data collected as part of implementation of the CCR rule indicates that the uppermost aquifer beneath the FAB is unaffected by CCR operations. Therefore, the foundational premise of the detection monitoring program that the aquifer remains unaffected (i.e. the underlying clay is protective) has been met, and, as such, the well network is designed to detect a potential future release per 40 C.F.R § 257.91. There is no mechanism for groundwater in the upgradient wells to be affected by a release from the CCR unit through the clay. The upgradient/background monitoring wells are located approximately from 150 to over 600 feet on the upgradient edge of the CCR unit and are separated from the surface with over 37 feet of clay (reference boring logs/ALD for actual clay thickness on upgradient edge). It would require travel times that far exceed the timeframe in which the impoundment has been in service for CCR-affected water to get through the glacially compacted natural clay liner system as demonstrated in the Natural Clay Liner Equivalency Evaluation Report, DTE Electric and Consumers Energy Company Six Southeast Michigan Coal Combustion Residual Units, December 2018 (Liner Equivalency Report) (Application Appendix A), PALD (submitted to EPA November 30, 2021) (Attachment A of this response letter), and the Final ALD (Attachment B of this response letter).

Additionally, as detailed in Section 2.4 of the Application, the upgradient wells exhibit extraordinary upward vertical gradients as exhibited by their flowing artesian conditions. This condition occurs due to the confining nature of the clay that creates an impermeable barrier above the limestone aquifer and that groundwater is under extreme pressure because it cannot move into the clay. When this pressure is released (such as when a monitoring well is installed), it allows groundwater to rise to a "static head" level

¹⁰ U.S. EPA. 2009. "Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities: Unified Guidance." EPA 530-R-09-007. Office of Resource Conservation and Recovery. Washington, DC. March. p. 2-10.

also known as the potentiometric surface. For the FAB upgradient wells, these potentiometric surfaces have consistently been more than 10 feet above the ground surface, also referred to as flowing artesian wells. This indicates that groundwater is under a significant amount of pressure with strong vertical flow potential, indicating that, in addition to the clay barrier, forces in the aquifer would be acting against any potential vertical migration through the subsurface. Therefore, these "background" wells have not been affected and groundwater samples collected from them are representative of background conditions at that location. In addition, per 40 C.F.R. § 257.91, the monitoring well network was certified by a QPE and approved by the state regulatory agency. Further, the Aquifer Characterization Study (Attachment C of this response letter) provides additional data and lines of evidence substantiating that the uppermost aquifer is unaffected and that groundwater at all the monitoring wells are not in communication with the CCR in the FAB.

Specifically, the Aquifer Characterization Report substantiates the conceptual site model developed for the site at the early stages of the monitoring program, affirm that the uppermost aquifers remain unaffected by the facility, and further demonstrate that the FAB is not in hydraulic communication with the uppermost aquifer, with the following additional lines of evidence:

- ― Groundwater geochemistry is reflective of the natural environmental conditions and is influenced by the interaction of aquifer materials with various minerals, gases, and dissolved-phase constituents that are available to react with the water as it travels through the subsurface, including the presence of Appendix III concentrations in groundwater;
- ― Trilinear Diagrams demonstrate that the FAB geochemical composition is very different than the groundwater in the uppermost aquifer;
- ― Stable isotopes within uppermost aquifer groundwater are consistent across all wells within the monitoring system and are significantly different than the isotopic signatures of the CCR-contact water in the FAB;
- ― Tritium data clearly shows that the groundwater within the uppermost aquifer groundwater pre-dates the time that the FAB entered service; and

― Principle Component Analysis and Linear Discriminant Analysis of 2016 to 2022 Appendix III groundwater data for the FAB demonstrated that the uppermost aquifer groundwater at the FAB and the CCR unit water are significantly different with a 95% confidence level. This is another line of evidence that the uppermost aquifer groundwater is not in communication with the FAB CCR unit water.

As such, there is a considerable amount of site characterization data that demonstrate these "background" wells have not been affected and that the groundwater samples collected from the monitoring system is representative of natural background conditions.

2. Groundwater Monitoring System Design is Adequate

Regulation 40 C.F.R. § 257.91(b) requires that the monitoring system design be determined based on site-specific technical information. 40 C.F.R. §§ 257.91(b)(1) and (2) specify that the technical information must include thorough characterization of: aquifer thickness, groundwater flow rates and directions, seasonal fluctuations in groundwater flow; saturated and unsaturated geological units and fill materials overlying the uppermost aquifer; materials comprising the uppermost aquifer; and materials comprising the confining unit defining the lower boundary of the uppermost aquifer, including, but not limited to, thickness, stratigraphy, lithology, hydraulic conductivities, porosities, and effective porosities. The regulations do not prescribe the exact number, location, and depth of monitoring wells needed to achieve the general performance standard.

The Application, PE certification, and operating record include detailed technical information used to design the groundwater monitoring system including the key sitespecific information (e.g. boring logs, well construction diagrams, water level data, groundwater flow direction, etc.) for the monitoring well network. The November 2021 preliminary ALD that has been in EPA's possession since November 2021 further provides a voluminous amount of site characterization data, confirms the conceptual site model, and speaks to the adequate characterization of the site hydrogeology and heterogeneity.

The design of the monitoring system relies on professional judgement based on site specific technical information and defers to PE certification for approval. 40 C.F.R. § 257.91(f) requires "The owner or operator must obtain a certification from a qualified

professional engineer stating that the groundwater monitoring system has been designed and constructed to meet the requirements of this section." EPA's Preamble discussion states: "For the final rule, EPA has developed a groundwater monitoring program that is flexible and allows facilities to design a system that accounts for site specific conditions within specific parameters. The final rule establishes an overall performance standard that the system must meet, lays out the minimum requirements of an effective system, and requires the owner or operator to design a system that achieves that overall performance standard based on a full characterization of site conditions."[11](#page-21-0) Nevertheless, working within these constraints the rule specifically allows the QPE to design a system that accounts for site conditions within the parameters of the minimum technical criteria, and EPA has added language to the regulation that expressly clarifies this.

The groundwater monitoring system consists of a total of seven monitoring wells evenly distributed along the FAB perimeter, including two upgradient wells (MW-16-04 and MW-16-05) that are representative of background hydraulically upgradient from the FAB, three downgradient wells (MW-16-01, MW-16-07, and MW-16-06), and two side gradient wells (MW-16-02 and MW-16-03). This distribution of wells allows groundwater quality to be monitored around the perimeter of the CCR unit, provides a comprehensive view of groundwater flow direction and rates across the footprint of the entire CCR unit, allows adequate collection of background data upgradient, downgradient, and side gradient of the CCR unit, and facilitates assessment of any spatial variability in groundwater geochemistry across the uppermost aquifer beneath the footprint of the unit. The seven monitoring wells located around the perimeter of the FAB have been selected to serve as both background and downgradient monitoring wells using intrawell statistical methods (discussed in more detail below in Section VIII.B.1.a) and provide increased protection by having downgradient monitoring wells distributed around the perimeter of the FAB (see Application at p. 14).

Aquifer characteristics are one of the key considerations in designing a monitoring system, such as hydraulic conductivity, hydraulic gradient, groundwater flow direction, aquifer heterogeneity, etc. As detailed in the Application (p. 5-7), the uppermost

¹¹ Preamble at 21397-21398.

aquifer is situated within the laterally extensive limestone bedrock that is as thick as 350 feet in Monroe County^{[12](#page-22-0)} that is present beneath a thick, contiguous glacially compacted natural clay liner system that serves as a natural confining hydraulic barrier that isolates the underlying aquifer across the entire site (Application Figures 3-5). Additional data collected in the ALD confirmed the thickness of the clay ranges from 14 to 34 feet thick and the permeability run with compatibility testing for over two years ranges from $3.3 \times$ 10⁻⁹ cm/s to 1.0 x 10⁻⁸ centimeters per second (cm/s).^{[13](#page-22-1)} Horizontal groundwater flow potential is consistently to the northeast (Application Figures 6-10) with strong vertical upward gradients (Application Section 2.4). The limestone aquifer represents a single hydrostratigraphic unit beneath the clay. Due to the strong upward gradients in combination with the laterally contiguous nature of the limestone, it is appropriate to place the monitoring wells within the uppermost portion of uppermost aquifer, beneath the clay, to ensure detection of any potential leakage from the CCR unit. The consistency observed in the groundwater flow direction since monitoring began in 2016 ensures that groundwater is constantly flowing in the direction of the three downgradient monitoring wells installed along the north perimeter of the FAB and confirms that these monitoring wells are appropriately placed to intercept groundwater flowing beneath the FAB.

The other key consideration in determining the placement of the monitoring well network are the physical and chemical characteristics of the potential contaminants of concern. The groundwater monitoring system is used to identify potential releases from the CCR unit by monitoring the Appendix III constituents (boron, calcium, chloride, fluoride, pH, sulfate and total dissolved solids [TDS]) (§ 257.94). The Appendix III constituents are known leading indicators of releases and were selected as primary indicators in detection monitoring due to, among other qualities, their elevated concentrations (typically) in the CCR material being managed and their generally high mobility and low reactivity in the environment.¹⁴ These properties allow Appendix III constituents to travel readily through groundwater (transport is advection-dominated),

¹² Reeves, H.W., Wright, KV and Nicholas, J.R., 2004, Hydrogeology and Simulation of Regional Ground-Water-Level Declines in Monroe County, Michigan, Water-Resources Investigations Report 03-4312, U.S. Department of the Interior, U.S. Geological Survey, Lansing, Michigan, p. 69

 13 April 2023 final ALD, p. 3-3
 14 Preamble at 21342.

remain detectible in the waste and groundwater, and provide early detection of potential leakage from the CCR unit being monitored. Based on these properties, Appendix III parameters can be expected to be fairly ubiquitous (not concentrated at a particular depth) and migrate throughout groundwater at approximately the rate of groundwater flow, therefore installation of the compliance wells in the downgradient direction of flow is appropriate. Groundwater is confined with hydraulic head levels above the top of the uppermost aquifer, demonstrating significant upward flow potential (free flowing artesian at natural ground surface over most of the FAB CCR unit), in addition, the Appendix III constituents are readily going to move with groundwater, and groundwater hydraulic gradients have demonstrated that horizontal flow potential is consistently toward the north-northeast, therefore, screening at the depth of first saturation in the uppermost aquifer (immediately beneath the overlying clay) is appropriate, along with the three wells appropriately positioned in the downgradient direction, which is ideal for early detection of groundwater influenced by potential leakage from the FAB.

Based on these two key considerations, the groundwater monitoring system clearly meets the performance standard of § 257.91(a) and accomplishes EPA's stated objective in the Proposed Decision, p. 11, that says "[t]he objective of a groundwater monitoring system is to intercept groundwater to determine whether it has been contaminated by the CCR unit being monitored."

Further, not only has the network been certified by a QPE per the rule and meets the performance standards set forth in \S 257.91(a), the monitoring system has been approved by the Michigan Department of Environment, Great Lakes and Energy (EGLE) for groundwater monitoring in compliance with the Natural Resources and Environmental Protection Act, Act 451 of 1994, as amended, Part 115 Solid Waste Management regulations.

B. The CCR Impoundment Properly Remains in Detection Monitoring

DTE's Application, in addition to all of the data available to EPA throughout their 2-year review period, successfully 1) documents that the groundwater monitoring system at the FAB meets all the requirements of 40 C.F.R. §§ 257.93 through 257.94, and 2) demonstrates that the FAB appropriately remains in detection monitoring.

1. Sampling and Analysis Program

Statistical analysis is a principal component of the CCR rule groundwater monitoring program. As summarized in EPA's Unified Guidance,^{[15](#page-24-0)} the fundamental goals of the CCR rule groundwater monitoring regulations are fairly straightforward. Regulated parties are to accurately characterize existing groundwater quality at their facility, assess whether a CCR release has occurred and, if so, determine whether measured levels meet the compliance standards. Using accepted statistical testing methods, evaluation of groundwater quality should have a high probability of leading to correct decisions about a facility's regulatory status. Essentially, this is accomplished through the framework provided in the CCR rule under with § 257.93 and § 257.94 that requires groundwater compliance monitoring be statistically compared to background groundwater quality through implementation of the detection monitoring program.

The following section provides additional discussion and clarification of information related to the statistical analysis program performed in accordance with § 257.93 in response to EPA's comments in the Proposed Decision (p. 18-36) that focus on that statistical methods portion of the sampling and analysis program under § 257.93(f) and (g). It should be clarified that DTE is only relying upon and justifying one monitoring system, serving both the Fly Ash Basin and the Vertical Extension Landfill, rather than the two monitoring systems referred to by EPA in the Proposed Decision on p. 18.

a. Reliance on Intrawell Comparisons

There are two general approaches, referred to as interwell and intrawell, that are used to perform data comparisons to background as presented in the EPA Unified Guidance and in the EPA Solid Waste Disposal Facility Criteria Technical Manual.^{[16](#page-24-1)} Interwell comparison methods compare background and compliance data collected from distinct spatial locations (upgradient versus downgradient). Whereas intrawell statistical limits compare historical background (collected from each individual well) to current data from a single location. There are certain conditions that should be considered when selecting which method is appropriate that include

¹⁵ U.S. EPA. 2009. "Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities: Unified Guidance." EPA 530-R-09-007. Office of Resource Conservation and Recovery. Washington, DC. March. p. 1-1.

¹⁶ U.S. EPA 1993. Solid Waste Disposal Facility Criteria Technical Manual. Solid Waste and Emergency Response. EPA530-R-93-017. November.

site specific hydrological factors and groundwater data behaviors that may influence the power of the test. 17

As discussed in the Application, due to the slow horizontal travel velocities (on the order of 70 feet/year), the presence of the underlying glacially compacted natural clay liner system (which result in excessive vertical travel times, that if groundwater were capable of migrating vertically through the clay would take over 130 years to reach the uppermost aquifer), the strong upward vertical flow potential of the uppermost aquifer, in addition to the spatial variability observed in the uppermost aquifer dataset, an intrawell statistical program has been selected to perform detection monitoring at all seven monitoring wells located around the perimeter of the CCR unit and comply with the requirements of 40 C.F.R. § 257.93. This selection is appropriate based on the site specific hydrogeological considerations and evidence of significant spatial variability across the monitoring well network attributed to natural conditions in the aquifer (i.e. the uppermost aquifer remains unaffected by CCR operations) that, consistent with the recommendations in the Unified Guidance^{[18](#page-25-1)}, warrants the use of intrawell testing because it is a more powerful and appropriate method for detection monitoring under the site conditions that exist at the FAB CCR unit. Further discussion below provides additional detail on how the assumptions of interwell are not met and thus support intrawell as a more appropriate and powerful test for the FAB.

i. Groundwater Velocity

One of the assumptions in background-to-downgradient comparisons (i.e. interwell comparison) presented in the Unified Guidance, p. 6-29, is that "[g]roundwater flow should also move at a sufficient velocity beneath the site, so that the same groundwater observed at upgradient well locations is subsequently monitored at downgradient wells in the course of an evaluation period (*e.g*., six months or a year). If groundwater flow is much slower, measurements from upgradient and downgradient wells may be more akin to samples from two separate aquifers. Extraneous factors may separately

¹⁷ Unified Guidance, p. 6-25 to 6-33.
¹⁸ Unified Guidance, p. 8-1

influence the downgradient and background populations, confusing the determination of whether or not a release has occurred.".

Specifically at the FAB, there is an over 4,000 ft horizontal distance between MW-16-05 (upgradient) and MW-16-01 (downgradient) perpendicular to the direction of groundwater flow (along the same assumed flow path). Conservatively assuming the groundwater horizontal seepage velocity of \sim 100 feet/year (data are provided in the Application and semiannually in the Annual reports). This results in about 40 years travel time from the upgradient to downgradient edge of the FAB. Even if a hypothetical groundwater velocity on the order of 10x higher than the average were assumed, groundwater flow would still be much slower than the 6-month evaluation period.

ii. Spatial Variability

The EPA's Unified Guidance recommends the use of intrawell comparisons in situations where spatial variability is present – this is a reoccurring message that is reinforced in multiple chapters throughout the Unified Guidance, including an entire chapter dedicated to spatial variability and ways to identify it (see Chapter 13). For instance, on Unified Guidance p. 3-5, in reference to spatial variation across the well network, the Unified Guidance states: "If evident, the statistical approach would need to be modified so that distinct wells are treated as individual populations with statistical testing being conducted separately at each one (i.e., intrawell comparisons)". The presence of significant spatial variability can invalidate the interwell method.

From the Unified Guidance Chapter 5 (p. 5-8), "If the spatial variation is ignored and data are pooled across wells with differing mean levels (and perhaps variances) to run an interwell parametric prediction limit or control chart test, the pooled standard deviation will tend to be substantially larger than expected. This will result in a higher critical limit for the test. Using pooled data with spatial variation will also tend to increase observed maximum values in background, leading to higher and less powerful non-parametric prediction limit tests. In either application, there will be a loss of statistical power for detecting concentration changes at individual compliance wells.

Compliance wells with naturally higher mean levels will also be more frequently determined to exceed the limit than expected, while real increases at compliance wells with naturally lower means will go undetected more often." This further demonstrates that significant spatial variability can reduce the power of the test by introducing higher variability in the background dataset and "exaggerating" the background limit.

EPA states (Proposed Decision p. 21) that "the Application does not consider the effect of the smaller background dataset that would result from reliance on downgradient compliance wells. When relying on upgradient wells to establish background concentrations, the data collected from each additional well can be pooled and used to increase the initial baseline sample size." However, EPA's comment does not consider the effect of using an incorrect statistical model for detection monitoring. The goal of detection monitoring is to correctly discern whether a release has occurred from the CCR unit. Having a statistical method with theoretically high power that ignores the hydrogeological facts of the unit is not going to achieve that goal. As discussed, multiple times throughout the Unified Guidance, spatial variability must be a consideration in determining an appropriate statistical test. In the case of the FAB, there is significant spatial variability in concentrations within the two upgradient monitoring wells. When pooled, this would result in a similar scenario as described above with the tests having lower statistical power. Although sample size of the background dataset is indeed a consideration, a larger background does lead to more power, there are recognized limitations in sample size during the onset of a detection monitoring program that can be resolved by updating background as described in and advocated for in the Unified Guidance [see Chapter 5].

Per the EPA's Unified Guidance, "the goal of groundwater analysis is not simply to identify significant concentration differences among monitoring wells at compliance point locations. It is also to determine why those differences exist."¹⁹ Recognizing spatial variability and why it exists and assigning the appropriate statistical approach to account for the spatial variability is even

¹⁹ Unified Guidance, p. 13-2.

more important than ensuring that normality assumptions are met. In order to apply intrawell analysis, the aquifer must remain unaffected by releases from the CCR unit. The Unified Guidance recognizes that the determination of whether an observed pattern of spatial variation is natural and not synthetic requires expert judgment and knowledge concerning site hydrogeology and geochemistry to provide more definitive answers.^{[20](#page-28-0)} As detailed in the Application, DTE has performed that analysis and has determined that the aquifer is unaffected by the operation of the CCR unit using multiple lines of evidence. DTE has further studied the uppermost aquifer and has provided additional geochemical, stable isotopic, and radiogenic data that further confirm the uppermost aquifer is unaffected by CCR operations at the FAB.

Further analysis of the spatial variability is also provided herein to further demonstrate that the assumptions of interwell are invalidated due to the spatial variability across the well network, and between the two upgradient background wells. Thus, the use of intrawell methods is more appropriate and provides a more powerful statistical approach. Spatial variability was assessed on the dataset collected from all seven monitoring wells between August 2016 and April 2022 using box plots and analysis of variance (ANOVA) tests as recommended by the Unified Guidance (see Chapter 13). The results of the ANOVA test show significant variance is observed for boron, calcium, chloride, fluoride, sulfate and TDS across the entire well network. This is not unexpected. According to the Unified Guidance, indicator parameters are more likely to exhibit spatial variation.²¹

Box plots provide a visual display of the variability and illustrate the differences in mean concentration observed at each well. Examples for boron, chloride, and TDS are shown below.

²⁰ Unified Guidance, p. 13-2.

²¹ Unified Guidance, p. 6-31.

As shown in the box plots, some of the concentrations in the background wells (i.e. chloride at MW-16-04) are much higher compared to the downgradient wells. That even when pooled, would result in a significantly higher concentration in the upgradient wells compared to the downgradient wells, lowering the sensitivity of the test and reducing the efficiency in detecting an increase in the downgradient wells.

Data populations were also compared using t-tests between the two upgradient wells (MW-16-04 and MW-16-05) to assess spatial variation between the two background wells for each of the Appendix III constituents. The results show evidence of significant difference between the two data populations within the background wells for boron, calcium, chloride, and fluoride as shown in the table below. To further compare the upgradient and downgradient data populations, t-tests were also used to compare the pooled upgradient wells (MW-16-04 and MW-16-05) and the pooled downgradient wells (MW-16-01, MW-16-06, and MW-16-07). This resulted in significant differences between the upgradient and downgradient populations for boron and fluoride. Looking

at the concentrations, the upgradient wells have higher concentrations of calcium and chloride, and lower concentrations of boron and fluoride when compared to the downgradient wells.

* one or more sample sets are not normally distributed

O t-test does not indicate a statistically significant difference between samples

t-test indicates concentrations in the downgradient well(s) are higher than in upgradient/background

t-test indicates concentrations in the downgradient well(s) are lower than in upgradient/background

t-tests run using Welch's t-test methods at 98% two-tailed confidence

The dataset exhibits significant spatial variability across the well network for multiple Appendix III constituents that, as demonstrated through the Aquifer Characterization Study and the historical record for the site, is clearly the result of natural groundwater chemistry (not due to influence from the CCR unit). Due to the spatial variability and the aforementioned hydrogeological considerations, including the slow and insufficient groundwater velocity across the site, several key assumptions of interwell tests are not met, therefore, intrawell methods are appropriate at the FAB.

b. Use of Appropriate Statistical Distributions

The CCR rule provides a framework for groundwater monitoring and defines the conditions under which statistical testing takes place. Specific statistical methods are identified in the CCR rule, just as they are in the RCRA regulations, but their application is not described in any detail. In order to implement a statistical analysis program, professionals must rely upon mathematical models and calculations, but just as importantly, professional experience and qualified decisionmaking to navigate the complexities of applying statistics to groundwater data. The CCR rule itself accounts for this by requiring QPE certification as the regulatory mechanism for demonstrating compliance with of the statistical method under § 257.93(f)(6).

 \overline{X} t-test does indicate a statistical difference between samples

Because a statistical model is at best an approximation of reality, all statistical tests and procedures require certain assumptions for the methods to be used correctly and for the results to be properly interpreted.^{[22](#page-32-0)} There are generally two types of statistical tests used in groundwater monitoring programs, parametric and non-parametric tests. Both of these statistical tests rely on the construction of a binary hypothesis test. The power of a binary hypothesis test is the probability that the test correctly rejects the null hypothesis when a specific alternative hypothesis is true. This probability represents the chances of a true positive detection conditioned on the actual existence of an effect. As a result, as the power of a test increases, the probability of wrongly failing to reject the null hypothesis (i.e. false negative) decreases.

Of these two statistical methods, parametric tests offer more statistical power and are preferred over non-parametric tests. However, most parametric test methods make a critical assumption that the underlying data follow a normal distribution, and if that underlying assumption is violated, it can impact the validity or accuracy of the test.^{[23](#page-32-1)} For this reason, it is important to check the normality of the dataset prior to selecting the appropriate statistical test. Non-parametric tests do not rely as heavily on the underlying data distribution; however, non-parametric tests require larger sample sizes than the parametric tests to ensure a similar level of statistical power.^{[24](#page-32-2)} So as long as the underlying distribution assumptions are met, parametric tests are preferred over non-parametric tests.

A statistical distribution is a mathematical model used to represent the shape and statistical characteristics of an unknown population (e.g., the concentrations of Appendix III constituents in groundwater upgradient of a CCR unit) that forms the basic building blocks of all statistical testing procedures.^{[25](#page-32-3)} A distribution in statistics is a function that shows the possible values for a variable and how often they occur. A normal distribution is typically bell-shaped. There are multiple techniques presented in both the EPA's Unified Guidance and EPA's ProUCL

²² Unified Guidance, p. 10-1.

²³ Unified Guidance, p. 17-9.

²⁴ Unified Guidance, p. 17-9.

²⁵ Unified Guidance, p. 3-2.

Technical Guide to assess data distributions and determine whether normality is observed in the dataset, 26 thus ensuring that the underlying assumption of normality are appropriately met under 40 C.F.R. \S 257.93(q)(1). Despite there being many types of normality tests available, based on the information provided by the Agency, EPA's comments in the Proposed Decision rely solely on one particular normality test and exaggerate the effectiveness of the recommended Type I error rate for that specific normality test, which has no practical effect on compliance at the FAB.

The methods used by DTE to determine the selected distributions were appropriate for the available monitoring data, as required by 40 C.F.R. § 257.93(g)(1) and were developed using the QPE-certified statistical analysis plan developed for the site. 40 C.F.R. § 257.93(g)(1) does not prescribe the exact distribution test to be used to assess normality in the dataset, nor does it expressly state the Type I error rate to be used in normality testing. Data distribution is a function that specifies all possible values for a variable and also quantifies the relative frequency (probability of how often they occur). The EPA's Proposed Decision relies exclusively on the Shapiro-Wilk test for normality, when in fact there are several methods available to determine appropriate distributions, many of which are described in the EPA's Unified Guidance. A combination of several methods is typically used to test the normality of the dataset as described in the Unified Guidance, such as graphical (i.e. visual) methods that explore possible patterns present in data sets and numerical (i.e. quantifiable) methods that are often supplementary to visual methods. DTE used multiple methods to test normality, including skewness tests, probability plots, and Shapiro-Wilk tests to verify the distribution of the data as shown in Application Appendix E and I.

EPA's selective references to the Unified Guidance are misleading. Using the multiple methods recommended by the EPA's Unified Guidance and allowable by §

²⁶ U.S. EPA. 2009. "Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities: Unified Guidance." EPA 530-R-09-007. Office of Resource Conservation and Recovery. Washington, DC. March, 2013. ProUCL Version 5.0.00 Technical Guide. Statistical Software for Environmental Applications for Data Sets with and without Nondetect Observations. USEPA Office of Research and Development. Washington, D.C. EPA/600/R-07/041. September.

DTE Electric Comments

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257.93(g)(1) to test the distribution of the dataset does not necessarily include an associated Type I error rate. However, as stated above, § 257.93(g)(1) does not prescribe which distribution test must be used, nor does it require a correspondent Type I error rate, to assess normality in compliance with the CCR rule. Section 10.3 of Unified Guidance states that "Assumptions of normality are most easily made with regard to naturally occurring and measurable inorganic parameters, especially under background conditions." These are the conditions applicable to Appendix III parameters. The EPA's ProUCL Version 5.0.00 Technical Guide notes that "goodness-of-fit (GOF) tests to determine data distribution (such as the Shapiro-Wilk test for normality) often fail if there are not enough observations (e.g., <20 observations), or if the data contain multiple populations, or if there is a high proportion of non-detects in the collected data set. Tests for normality lack statistical power for small sample sizes. In this context, a sample consisting of less than 20 observations may be considered a small sample. However, in practice, many times it may not be possible (due to resource constraints) to collect data sets of sizes greater than 10." This further supports that *reliance solely on the formal Shapiro-Wilk test is not appropriate to verify normality, particularly at the onset of a new monitoring program* where datasets are typically limited to less than 10 observations.

EPA's comments in the Proposed Decision contradict the recommendations in EPA's Unified Guidance and the EPA's ProUCL Technical Guide by over emphasizing ways to identify non-normal distributions, rather than performing a more thorough assessment that the data population is normally distributed (i.e., the null hypothesis is met). Particularly when taking into consideration the pitfalls of using only a goodness-of-fit test and incorrectly assigning non-normality using the limited background dataset available for Appendix III constituents at the onset of the monitoring program. The Unified Guidance, page 18-6, states that "When normality cannot be justified, a non-parametric prediction limit should be considered instead. A non-parametric limit assumes only that all the data come from the same, unusually unknown, continuous population. Non-parametric prediction limits generally require a much larger number of background observations in order to provide the same level of confidence as a comparable

parametric limit. Consequently, the Unified Guidance recommends that a parametric model be fit to the data *if at all possible*."

The Unified Guidance contemplates exploration of different distribution models (i.e. mathematical transformations of the raw measurements) to exhaust all options to identify normality in the underlying dataset before assigning a non-normal distribution. The original values can be transformed into a set of numbers that behaves as if drawn from a normal distribution. The transformed values can then be utilized in and analyzed with a normal-theory test (i.e., a procedure that assumes the input data are normal).²⁷ This is clearly laid out in the Unified Guidance example of fitting distributions using a Shapiro-Wilk test.²⁸ The Shapiro-Wilk test can be used to test normality for datasets with fewer than 50 observations ($n \leq 50$). A significance level is selected to establish the critical point to compare against when running the statistical test for normality (i.e. assess whether the resulting test statistic is above or below the critical point based on the assigned significance level). The Unified Guidance generally recommends selecting a significance level of 0.01 for very small datasets (*n* < 10), 0.05 for moderately sized datasets (10 \leq n < 20), and 0.01 for larger data sets ($n \geq 20$).^{[29](#page-35-2)} When the Shapiro-Wilk statistic exceeds the critical point, normality can be accepted as a reasonable model for the underlying population. However, if the Shapiro-Wilk test rejects normality at that significance level, additional testing is recommended by the Unified Guidance to see if another distribution model provides a better fit.^{[30](#page-35-3)} If the Shapiro-Wilk test shows significant evidence of nonnormality (i.e. does not meet the critical point), then "the data should be transformed using logarithms or another transformation on the ladder of powers and re-checked using the Shapiro-Wilk test before proceeding with further statistical analysis."³¹ Although it is recognized that in some cases a non-parametric limit is appropriate, as demonstrated in the Unified Guidance, it is a last resort due to its lack of power compared to parametric tests.

²⁷ Unified Guidance, p. 3-8.

²⁸ Unified Guidance, p. 10-13 to 10-15.

²⁹ Unified Guidance, p. 10-14.

³⁰ Unified Guidance, p. 10-14.

³¹ Unified Guidance, p. 10-14.
DTE's statistical analysis plan developed for the FAB groundwater monitoring program also contemplates these transformations in addition to procedures on treating non-detects and potential outliers in the dataset that, if present, can also have a profound effect on normality if not accounted for appropriately. There are several variables necessary to account for in verifying which data distribution assumptions are appropriate for the statistical tests to meet the performance standards outlined in §257.93(g).

It is well understood that statistical power is limited by the sample size and that sample size is limited at the onset of any new monitoring program. This concept is also supported by the EPA's Unified Guidance that states, "very small individual well samples in the early stages of a monitoring program may make it difficult to utilize an intrawell method having both sufficient statistical power and meeting false positive design criteria." 32 This is correctable with the addition of new sample data which is incorporated into the background dataset periodically to improve statistical power of the test over time, which is exactly what DTE has done. The statistical power of the tests was improved by updating the background prediction limits once additional observations were available, in accordance with the recommendations in the Unified Guidance (see Chapter 5). This was completed for the FAB in December 2021 and presented in the 2021 Annual Groundwater Monitoring Report (available on DTE's CCR rule compliance data and information website^{[33](#page-36-1)}), subsequent to submittal of the Application. The number of samples comprising the background set for each well/constituent pair increased from 8 to 16, except for two that had 15 results after removal of outliers. Comparing the updated UPLs to the initial ones, 4 well/ constituent pairs moved from nonparametric to parametric, while 6 moved from parametric to nonparametric. While some of the updated prediction limit values changed, the magnitude of the changes were small.

³² Unified Guidance, p. 6-34.

³³ https://www.dteenergy.com/us/en/residential/community-and-news/environment/coal-combustion-residualrule-compliance-data-and-information.html

c. Effectiveness of Prediction Intervals

40 C.F.R. § 257.93(f) allows for the use of multiple statistical methods and defers to the QPE to ensure that the selected method meets the minimum performance standards of 40 C.F.R. § 257.93(g) to ensure contamination can be detected. Prediction intervals are calculated based on background samples and are thus frequently used for detection monitoring programs, which is based on comparisons to background water quality. Per the Unified Guidance, prediction intervals provide well established testing strategies for simultaneously controlling false positive rates while maintaining adequate power to detect contamination during detection monitoring, they offer flexibility to accommodate a wide variety of groundwater monitoring networks, and are generally easy to construct and straightforward to interpret.[34](#page-37-0) Although the rule itself does not require a minimum nominal false positive rate as specified in 40 C.F.R. § 257.93(g)(2), prediction intervals combined with a retesting strategy can result in sufficiently low Type I error rates and the ability to detect real contamination. From a practical standpoint, prediction limits were selected for the FAB and have been demonstrated to adequately meet the performance standards in 40 C.F.R. § 257.93(g)(4) as discussed below.

Supporting analyses of the statistical calculations for the FAB program were provided to the Agency in the Application Appendix E (2017 Annual Groundwater Monitoring Report), which includes details on the statistical limit calculations at the onset of the monitoring program. DTE also provided the Groundwater Statistical Evaluation Plan for the FAB that provides an overview of the methods and steps used to guide these calculations (Application Appendix I). Since then, statistical updates have been performed in December 2021 and reported in the 2021 Annual Groundwater Monitoring Report (available to the Agency on DTE's CCR rule compliance data and information website 35 since early 2022). Additional detail is provided below to provide additional clarity and further justify the Type I error rate associated with the prediction intervals used at the FAB and demonstrate the effectiveness of the selected approach per 40 C.F.R. § 257.93(g)(4).

³⁴ Unified Guidance, p. 18-1 to 19-35

³⁵ https://www.dteenergy.com/us/en/residential/community-and-news/environment/coal-combustion-residualrule-compliance-data-and-information.html

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As discussed in Unified Guidance Chapters 18 and 19, the use of prediction limits requires management of the potential for high site-wide false positive rates (SWFPR), which can become very high in detection monitoring under the CCR rule with seven Appendix III parameters and at least three downgradient monitoring wells. The solution to managing the SWFPR (and the solution to $\S 257.93(q)(4)$) is to use a retesting strategy to control the SWFPR. This retesting procedure was contemplated from the onset of DTE's monitoring program as outlined in the Groundwater Statistical Evaluation Plan (Application Appendix I) and implemented as described throughout the annual groundwater reports since 2017 (Application Appendix C, D, and E, and DTE's CCR rule compliance data and information website^{[36](#page-38-0)}). For parametric prediction limits, k-multipliers are continuous statistical parameters that can be adjusted to match a desired false positive rate. As discussed by EPA in the Proposed Decision (p. 27), the Unified Guidance provides a set of tables that enable the estimation of the power provided by prediction limits with various resampling strategies. The series of tables were established with calculated k-multiplier values to meet a SWFPR of 10 percent, which exceeds the minimum of 5 percent established in §257.93(g)(2), under various testing scenarios (interwell or intrawell) with a given sample size and number of tests being run. Using the tables in Unified Guidance Appendix D.3 for intrawell prediction limits with a 1 of 2 resampling strategy, and semi-annual sampling with seven wells and seven constituents (interpolation between tables required), the initial prediction limits established with 8 sampling results fell marginally below the level having sufficient power compared to the EPA Reference Power Curve (ERPC) at 4 standard deviations (interpolated k-multiplier value 2.92).

A similar analysis using the 2021 updated prediction limits (15-16 observations) fell well within the region of the table exceeding the ERPC levels (interpolated value 2.26). Further, back-calculation of the k-multiplier from the ChemStat results in an even lower k-multiplier value. For example, using the dataset specific to sulfate in MW-16-06, the actual k-multiplier value is 2.0 for the initial 8 sampling events and 1.8 for the updated dataset using 16 samples. These lower k-multiplier values

³⁶ https://www.dteenergy.com/us/en/residential/community-and-news/environment/coal-combustion-residualrule-compliance-data-and-information.html

are well within the range of values that meet the ERPC and demonstrate that the aforementioned interpolations are conservative estimates and that the real power is actually better than the interpolated k-multiplier values indicate. Thus, further demonstrating adequate statistical power is achieved to ensure adequate detection of potential contamination and shows that the prediction intervals are in compliance with §257.93(g)(4).

As discussed above, lower statistical power at the onset of monitoring is expected due to the relatively small sample size and is recognized by the Unified Guidance as a challenge at the early stages of the monitoring program. The initial prediction intervals were established with the minimum eight sampling results because, at the onset of the 2015 CCR Rule, hydrogeological characterization and monitoring networks needed to be established, with at least eight baseline samples from each well, within the first two years of implementing the 2015 CCR Rule. This tight timeline to implement the program (including initial site characterization, establishment of monitoring networks prior to even beginning to collect baseline samples) inherently limited the number of baseline datapoints that could be collected and remain temporally independent. DTE has performed the recommended steps set forth in the Unified Guidance to make these improvements as soon as an appropriate number of additional observations were available. DTE completed the updates in 2021 as documented in the 2021 Annual Groundwater Monitoring Report (available on DTE's CCR rule compliance data and information website 37).

i. Outlier Testing

Outliers are data points in a dataset that are significantly different from other data points in the same dataset. In other words, they are values that are much higher or much lower than the rest of the data points in the dataset. Outliers can occur for a variety of reasons, such as errors in data collection, measurement errors, or unusual circumstances that are not representative of the normal behavior of the dataset. Outliers can have a significant impact on

³⁷ https://www.dteenergy.com/us/en/residential/community-and-news/environment/coal-combustion-residualrule-compliance-data-and-information.html

> the analysis of the dataset because they can skew the results or make it difficult to draw accurate conclusions. Therefore, it is important to identify and deal with outliers appropriately when analyzing a dataset. Typically, outliers are removed from a dataset that occurred due to errors or unusual circumstances that are unlikely to occur again. However, in some cases, outliers may be valid data points that represent important information, and in these cases, they should be retained in the analysis. Identification of outliers is key component of statistical testing to ensure that data are representative of groundwater conditions since the presence of even one extreme outlier may cause an otherwise recognizable distribution from being correctly identified.^{[38](#page-40-0)}

> For the FAB program, outliers were tested as described in the Groundwater Statistical Evaluation Plan (Application Appendix I) (which align with the recommendations set forth in the Unified Guidance) and details for specific handling of outliers are included in the documentation of the actual statistical limit calculations provided in Application Appendix E. In 2017, there were no identified outliers given that there were none identified in the timeconcentration plots as discussed in the Application on p. 320 and charts provided in the Application (p. 324-331). As stated in the Groundwater Statistical Evaluation Plan, data were reviewed graphically using tools such as time concentration trend plots, box and whisker plots and/or probability plots to illustrate and identify outliers, trends, or otherwise unusual observations at each monitoring location. This is accomplished prior to further in-depth review of the data sets to identify any obvious field or laboratory anomalies. Data points that are determined to be nonrepresentative will be 'flagged' for further detailed evaluation prior to removing from the background data or designating as an outlier. Further in-depth review would be a formal outlier test such as Dixon's Outlier Test. Like many steps throughout the monitoring program, there is need for professional judgement in the decision-making process to determine which outliers should be removed.

³⁸ Unified Guidance, p. 10-2.

In the Proposed Decision, EPA goes against its own guidance by using a statistical test to solely identify and remove outliers from the dataset. In the Unified Guidance, EPA clearly states "The Unified Guidance does not recommend that outliers be removed *solely* on a statistical basis."[39](#page-41-0) Per the Unified Guidance, a statistical determination of one or more statistical outliers does not indicate *why* the measurements are discrepant from the rest of the data set. The outlier tests can provide supportive information, but generally a reasonable rationale needs to be identified for removal of suspect outlier values (usually limited to background data). As such, EPA's rationale for outlier removal in the Proposed Decision is flawed. In addition to not following the correct methods, EPA's outlier comments are fraught with error as detailed below.

In the Proposed Decision (p. 29), EPA states, "Applying Dixon's test with ProUCL v5.1, EPA identified an outlier in the reported intrawell background datasets with 99% confidence at MW-16-07 for total dissolved solids (2,200 mg/L). An additional outlier was identified with 95% confidence at MW-16-02 for pH (7.4 mg/L)." There are several missteps and errors in this statement.

- o First, as discussed above, EPA is going against their own guidance by identifying outlier removal solely on a statistical basis. Formal testing for outliers should be done only if an observation seems particularly high or low compared to the rest of the dataset.^{[40](#page-41-1)}
- o Second, EPA is flip-flopping various confidence levels, using both 99% and 95% to justify removal of outliers. The Unified Guidance cautions that removal of outliers should only take place under certain conditions, since a true elevated value may fit the pattern of a release or a change in historical background conditions.[41](#page-41-2) By decreasing the confidence level to 95%, the chances of identifying a statistical outlier are also more likely. This is an example of how strictly sticking to a formal outlier test can end up

³⁹ Unified Guidance, p. 12-1.

⁴⁰ Unified Guidance, p. 6-35.

⁴¹ Unified Guidance, p. 6-35.

> eliminating data points that are only marginally greater than the bulk of the data.

- o Third, the TDS concentration of 2,200 milligrams per liter (mg/L) at MW-16- 07 was collected on June 12, 2017. This data point is not an outlier. As shown on Table 2 of the 2017 Annual Groundwater Monitoring Report (Application p. 303), that datapoint is not "extreme" compared to the rest of the dataset. The eight background data points are shown on the table, while 2,200 mg/L represents the maximum within the dataset, 6 of the 8 samples had a TDS concentration of 2,100 mg/L, with the other data point of 2,000 mg/L. The 2,100 mg/L concentration met the data quality objectives of the program (Application p. 315-316) and falls within a reasonable range compared to the other background data points. Therefore, there is no reason to even formally test for outliers in this case.
- o Fourth, EPA is selectively focusing on high data points as outliers and ignoring the low ones. This is evidenced by the fact that the highest TDS concentration (2,200 mg/L) and the lowest concentration (2,000 mg/L) at MW-16-07 are equally higher compared to the mean concentration of 2,100 mg/L (which is observed in the other 6 datapoints) by a marginal difference of 100 mg/L. Both are equally offset from the mean concentration, yet EPA only flagged the higher datapoint as an outlier.
- o Fifth, the EPA-identified outlier for "MW-16-02 for pH (7.4 mg/L)" was collected on March 7, 2017. This data point is not an outlier. As shown on Table 2 of the 2017 Annual Groundwater Monitoring Report (Application p. 303) and the time-series plot of pH (Application p. 329) the datapoint is not "extreme" in comparison with the other data points. The time-series plot also shows how pH in groundwater across the well network on that sampling data was slightly higher than the rest of the background datapoints indicating that the datapoint is not anomalous solely to MW-16-02. Additionally, there is a duplicate sample shown on Table 2 collected on November 15, 2016 with a pH of 7.5 SU that further supports the 7.4 SU is representative of groundwater conditions. As such, there is no reason to

> even formally test for outliers in this case. EPA also incorrectly identifies the units for pH as mg/L rather than SU.

Further, additional groundwater data collected through April 2021 was presented in the 2021 Annual Groundwater Monitoring Report (available to the Agency on DTE's CCR compliance data and information website^{[42](#page-43-0)}) and data were reassessed for outliers as part of the 2021 prediction limit update process. No outliers for TDS or pH were identified in the 2021 analysis, further confirming that the outliers identified by EPA in the Proposed Decision are not present in the dataset. However, two outliers for calcium were identified using the aforementioned screening process during the 2021 prediction limit update, which provides an example of how outliers are treated and documented throughout the program. The data presented in Appendix C of the 2021 Annual Groundwater Monitoring report demonstrates the step-wise approach and decision-making process used to assess suspected outliers through time-concentration graphs, probability plots, and formal outlier testing with Dixon's test, and further demonstrates that DTE is taking appropriate steps to develop effective prediction limits that meet the performance standard of 40 C.F.R. § 257.93(g)(4).

d. Alternate Source Demonstration is Adequate

As presented in the Application, the facility appropriately remains in detection monitoring in accordance with § 257.94 of the CCR rule. The PALD, ALD and the Aquifer Characterization Study provide additional detailed site information that further substantiates the conceptual site model at the site and the ASD, and further verifies that the FAB has not impacted groundwater.

Aside from being performed under a QPE direction and certification required by the rule, the ASD includes multiple lines of evidence that demonstrate the source is from something other than the CCR unit. Per the EPA's Unified Guidance, "the goal of groundwater analysis is not simply to identify significant concentration differences among monitoring wells at compliance point locations. It is also to

⁴² https://www.dteenergy.com/us/en/residential/community-and-news/environment/coal-combustion-residualrule-compliance-data-and-information.html

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determine why those differences exist.["43](#page-44-0) Under RCRA (§258.54) and the CCR Rule (§257.94), the owner or operator may demonstrate that a source other than the [CCR unit] caused the statistically significant increase (SSI) over background levels for a constituent or that the SSI resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. These are often referred to as "alternate source demonstrations" or ASDs. These demonstrations have been an important consideration in solid waste groundwater monitoring programs since RCRA was enacted decades ago in order to identify SSIs due to factors unrelated to the unit being monitored. This is especially relevant given that all of the constituents being monitored under the CCR Rule are naturally present in the environment, and in particular, the Appendix III constituents, are very commonly present at detectable concentrations in groundwater.

Fundamentally, groundwater chemistry is influenced by the interaction of aquifer materials in various minerals, gases, and groundwater constituents that are available to react with the water as it travels through the subsurface. Therefore, groundwater naturally has dissolved-phase constituents which can dissolve from the aquifer material (increasing their concentration in groundwater) or precipitate onto the aquifer material (decreasing their concentration in groundwater). Their mere presence in groundwater does not indicate that a release has occurred, nor does an increase in concentration necessarily indicate a release. There are many variables that contribute to natural differences that occur in groundwater quality. Oftentimes increases observed in detection monitoring are caused by natural changes in groundwater quality related to geo-environmental variations that occur throughout the aquifer and are attributable to geogenic sources. These changes can also occur seasonally due to natural processes and regional groundwater fluctuations such as flow rates, geochemistry, and water levels. As such, additional evaluation into the cause of an initial SSI is appropriate to be sure that the change is attributable the CCR unit.

DTE prepared an ASD for an initial SSI in January 2020 for TDS at a concentration of 2,300 mg/L, marginally above its respective prediction limit (PL) of 2,200 mg/L,

⁴³ Unified Guidance. Chapter 13, p. 13-2.

at monitoring well MW-16-04. The ASD was included in the 2019 Annual Groundwater Monitoring Report and submitted to the EPA within the Application (Appendix C). The ASD concluded that the single TDS SSI was attributable to natural variability, largely relying on the isolated occurrence and small magnitude of the increase, the lack of hydraulic connection between the CCR unit and the uppermost aquifer, and the relatively short timeframe at the start of the monitoring program that did not account for long-term temporal changes (i.e. small background dataset available to calculate the prediction limits).

EPA is proposing (Proposed Decision p. 31) to find the information provided in the application insufficient to conclude that local subsurface geology would have prevented leakage from reaching groundwater within the operational life of the impoundment based on the theoretical groundwater flow rates used in the evaluation in addition to alleged inadequate data to demonstrate the continuity and consistency of the low permeability of the underlying clay, along with the irrelevance of the background timeline. The significant amount of data provided to EPA in the Application and the multiple site characterization studies demonstrate that the impervious glacially compacted natural clay liner system beneath the FAB is laterally continuous, substantially thick, and hydraulically separates the CCR unit from the uppermost aquifer. These details are further enumerated below in Section VIII.C of this letter and further support the conclusions of the ASD.

The flow rate calculations used to assess groundwater flow rates are appropriate and are recommended by EPA's RCRA draft Technical Guidance (1992) and EPA's Solid Waste Technical Guidance (1993), and are in-line with industry standards and the principles of hydrogeology. The average linear velocity of groundwater flow is derived from Darcy's Law and is a function of hydraulic conductivity, hydraulic gradient, and effective porosity. As detailed in the CCR Rule, "Darcy's Law for gravity flow through porous media is directly proportional to the hydraulic gradient. The use of Darcy's Law to calculate fluid flow through porous media is a wellestablished and generally accepted engineering methodology" (2015 CCR Rule Preamble p. 21372). The flow calculations presented in the ASD estimate that, due to the consistently low permeability of the clay and the considerable thickness of the clay, it would take over 300 years to travel through the clay, which is well over

the 48 years of operation of the CCR unit. The addition of more data collected in the ALD confirms the continuity of the clay, and further refines the thickness of the clay to a range of 14 to 34 feet, with a geometric mean hydraulic conductivity of no more than 2.7 x 10⁻⁸ cm/s, resulting in vertical travel times of 130 years in fate and transport modeling presented in Section 4 of the PALD and final ALD (Attachments A and B), which is still well over the 48 years.

EPA is also proposing (Proposed Decision p. 32) to find that the absence of additional SSIs identified within the same or other monitoring wells is insufficient evidence to conclude that a potential release has not occurred. DTE acknowledges that the absence of additional SSIs identified within the same or other monitoring wells *on its own* is not a sufficient line of evidence to conclude that a potential release has not occurred in the FAB CCR unit. However, it is a line of evidence to consider in conjunction with other lines of evidence that a release has not occurred. In addition, boron (well known as a very conservative constituent that generally does not undergo retardation) would be expected to be the first constituent to be seen with a potential SSI in the monitoring well system and a potential boron SSI has not been identified to date.

Moreover, the timeframe over which the background dataset was collected is sufficient evidence, and highly relevant, to conclude that a potential release has not occurred given the timeframes allowed in the CCR rule. The original proposed CCR rule allowed one year, extended to two years, to perform site characterization, complete the monitoring system design, collect background samples, and develop a statistical analysis program. We agree with EPA that even two years is a very limited and ambitious timeframe to perform the necessary activities, especially for sites with deep wells and difficult drilling conditions. Discussed in the 2015 CCR Rule Preamble p. 21398: "After review of the comments received on this issue and careful reexamination of the actual requirements in the final rule, EPA agrees that a one-year timeframe is not feasible and has decided to extend the timeframes for completing installation of the system, including background monitoring, to two years." Therefore, as required by the CCR rule, DTE performed the necessary activities to comply with the rule and began detection monitoring at the FAB CCR unit within a two-year period.

As discussed above in detail in Section VIII.B.1.c, the predictive power of the statistics is typically limited due to the relatively small background datasets available at the beginning stages of a monitoring program. The baseline dataset used to develop the initial prediction limits in 2017 were limited by the tight timeframe in which these programs had to be established and limited the number of independent samples that could be collected prior to initiating the detection monitoring program. It is well recognized that statistical power is limited by the sample size and that sample size is limited at the onset of any new monitoring program. The initial PLs were the statistical limits available at the time of the TDS SSI. As detailed above, the statistical power is able to be improved over time as more samples are collected. Additional monitoring since 2017 has resulted in additional background data being collected and utilized to update the PLs in 2021 that account for temporal variation in the dataset and improve the statistical power of the test.

Further, monitoring well MW-16-04 is located hydraulically upgradient from the FAB. Not only is it hydraulically separated from the CCR unit vertically, but it is on the upgradient edge of the waste boundary. As discussed above and in Section 2.4 of the Application, the upgradient wells exhibit extraordinary upward vertical gradients as exhibited by their flowing artesian conditions. For the FAB upgradient wells, these potentiometric surfaces have consistently been more than 10 feet above the ground surface. Therefore, DTE has presented adequate information to conclude that the ASD for the single SSI observed for TDS at the FAB CCR unit is adequate and has been further supported by the preponderance of evidence provided in the ALD (Attachment B) and the Aquifer Characterization Study (Attachment C). In addition, in six consecutive semiannual groundwater monitoring events since the 2019 SSI at MW-16-04, there have been no SSIs at the MONPP FAB CCR unit.

e. The Monitoring Status is Adequate

The data provided to EPA in the Application, and the additional clarifications in this letter and documentation provided in the ALD and Aquifer Characterization Study, continue to confirm that the clay is laterally continuous across the base of the FAB and the uppermost aquifer is hydraulically separated from the FAB, and that the

aquifer remains unaffected. DTE has unequivocally demonstrated that the FAB remains in detection monitoring and that the presence of Appendix III parameters in groundwater in the uppermost aquifer are geogenic. It is also recognized and has been further explained above in Section VIII.B.1.a, that significant spatial variability is observed for most of the Appendix III parameters. The presence of these Appendix III constituents are attributable to variations in natural conditions that influence groundwater chemistry across the uppermost aquifer, which contributes to the variability in concentrations such as chloride and boron from well to well. The Unified Guidance is very clear that interwell methods are invalidated due to significant spatial variability, in addition to extremely slow horizontal groundwater flow rates that make it impossible to compare upgradient to downgradient concentrations for compliance. It has been demonstrated that the slight change observed for TDS (one constituent) at one hydraulically upgradient monitoring location that prompted the single ASD performed in January 2020 is not indicative of release to the uppermost aquifer. Therefore, the MONPP FAB remains appropriately in detection monitoring.

A significant amount of data is provided in the Application over the course of five sampling events from September 2017 through September 2019, in addition to another six events through 2022 available in the Annual Groundwater Monitoring Reports that consistently show groundwater flow constantly to the north-northeast that indicate monitoring well MW-16-03 is located side gradient to the FAB. Replacing local, site-specific static water level data with generalized descriptions of regional groundwater flow to make interpretations of downgradient well locations is pure speculation and goes against EPA's very own technical guidance that requires site specific, accurate water level measurements to make determinations on groundwater flow direction.^{[44](#page-48-0)} Groundwater flows from high potential to low potential, the head level data on the potentiometric surface maps provided for FAB show the lower head levels in the north-northeast direction, using the principles of hydrogeology groundwater is not flowing toward MW-16-03 from beneath the CCR unit. Regardless, MW-16-03 is routinely sampled as part of the detection monitoring program and statistical analysis is performed at that location that

⁴⁴ USEPA 1993 Solid Waste Technical Manual p. 227.

continues to demonstrate that there is no influence to water quality from the CCR unit.

EPA presented a hypothetical and erroneous statistical analysis in the Proposed Decision (p. 35) that falsely claims SSIs for boron are present across the site. While EPA did not provide sufficient backup for DTE to perform a comprehensive review, it appears that EPA's hypothetical statistical analyses are not valid in the context of the site-specific hydrogeological conditions that are observed at the FAB. The details of these hydrogeological conditions and how they have shaped the monitoring network design and statistical analysis program are presented in detail in the Application and have been further clarified above throughout this letter.

C. The Unit Has Provided Documentation of the Necessary Soil Characteristics and Engineering Quality to Perform the Demonstration

The Application was prepared to meet the requirement of the Rule and was viewed as an application to get to the next step to perform the rigorous demonstration, assuming that, like a typical application process, there would be some back-and-forth communication and any questions EPA had from review of the application would be addressed through the demonstration. Several comments in the Proposed Decision refer to missing or inadequate information that prevented EPA from being able to make a determination (therefore used as a basis for denial). However, many of those items were part of step 2 of the Part B process (to be completed during the rigorous field testing in the demonstration) or were succinctly included in the application to satisfy EPA's request in the Part B Preamble to keep the applications concise.[45](#page-49-0)

EPA stated in its Proposed Decision that DTE failed to demonstrate that the FAB has a liner that is of good quality and in line with proven and accepted engineering practices, as required by 40 C.F.R. § 257.71(d)(1)(i)(C). 40 C.F.R. § 257.71(d)(1)(i)(C) states that "Documentation of the design specifications for any engineered liner components, as well as all data and analyses the owner or operator of the CCR surface impoundment relied on when determining that the materials are suitable for use and that the construction of the liner is of good quality and in-line with proven and accepted engineering practices.*"*

⁴⁵ Preamble at 72514.

The FAB is a glacially compacted natural clay lined surface impoundment with an engineered component along the perimeter embankment. The embankment was constructed to meet engineering design criteria and has been heavily investigated and confirmed that it is of good quality and in line with accepted engineering practices with details on this included in Appendices H and L in the Application. To assess whether liner materials are suitable for use and construction of the liner is of good quality, data from the 1970s through 2020 were utilized to develop the conceptual site model for the FAB. The data and the conceptual site model provide multiple lines of evidence that the liner is of good quality and in line with proven and accepted engineering practices, such as the 1995 Detroit Edison Design Engineering report (included as Appendix K in the Application) that demonstrates that the gray clay-rich soil that the FAB is built directly on top of is consistently present beneath the bottom of the entire FAB with a thickness of greater than 14 feet and has a hydraulic conductivity generally ranging from 1.3×10^{-8} to 6.5×10^{-8} cm/s.

There was a single hydraulic conductivity test from the 1970s soil boring B8 collected from 41.5 feet that had a hydraulic conductivity of 1.9 x 10 7 cm/s as pointed out by EPA.^{[46](#page-50-0)} However, that depth is below the total thickness of clay-rich soil over much of the FAB as boring B8 had thicker clay-rich soil than most locations and it was the only sample run from below 36.5 feet. Further, seven additional soil samples were collected at five-foot intervals from 6.5 to 35.5 feet from the same B8 boring location and those seven additional samples had hydraulic conductivities ranging from 1.5 x 10^{-8} to 4.8 x 10^{-8} cm/s. This shows that there is not much heterogeneity in the upper portion of the clay beneath the FAB (i.e. the clay has a consistently lower hydraulic conductivity) and the highest hydraulic conductivity only occurs in the deeper clay, demonstrating the glacially compacted natural clay-liner system in this area is protective. Moreover, the additional detailed site characterization data presented in the ALD, further confirm that the 1.9 x 10⁻⁷ cm/s is not representative of the larger dataset. "The final rule requires that measurements of the variability of subsurface soil characteristics must be collected from around the perimeter of the impoundment to identify any regions of *substantially* higher hydraulic conductivity." [47](#page-50-1) The hydraulic conductivity of 1.9 x 10⁻⁷ cm/s is not *substantially* higher, it is very close to the hydraulic conductivity of 1 x 10⁻⁷ cm/s of the two feet of compacted clay for an existing

⁴⁶ Proposed Decision, p. 32.

⁴⁷ Preamble at 72519.

impoundment liner under the 2015 CCR rule^{[48](#page-51-0)}, and is insignificant when considering the thickness of the clay and consistency of the lower hydraulic conductivity soils that make up the clay immediately beneath the FAB, and the depth and limited occurrence of the 1.9 x 10⁻⁷ cm/s conductivity soils.

Also, the 2016 clay-rich soil in samples collected by TRC (included in Appendix A of the Application) had a hydraulic conductivity ranging from 1.2 x 10⁻⁸ to 1.6 x 10⁻⁸ cm/s. The geometric mean of the aforementioned hydraulic conductivity data is 2.7×10^{-8} cm/s as presented in the December 2018 Clay Liner Equivalency Report that was included as Appendix A of the Application. While groundwater has the ability to move horizontally through higher permeability zones, it also has to pass vertically through the most restrictive low permeability material first. As discussed in more detail below, these higher permeable zones are not continuous and do not represent a consistent hydraulic conductivity that occurs continuously at any point through the entire 14-foot (or more) vertical profile between the bottom of the FAB and the uppermost aquifer. Rather, they represent a small portion of the overall range in heterogeneity observed within the clay at various points throughout the subsurface based on over 200 CPT/soil borings and 38 soil hydraulic conductivity tests. Clay layers are laterally continuous across the site. As such, it is appropriate in this instance to consider the effective hydraulic conductivity in terms of the entire profile (e.g. the geometric mean). The mere presence of a slightly higher hydraulic conductivity in a limited number of samples does not preclude the ability of the clay to be protective when considering the entire thickness and lithologic and hydrogeological characteristics of the entire vertical profile of the substrate beneath the FAB.

This is also supported by the EPA's discussion in the Part B Preamble where it states, "EPA agrees that it is possible for individual impoundments that are not lined with a composite liner or an alternative composite liner (as those terms are defined in the CCR regulations) to still be protective of human health and the environment. This is possible if the effective hydraulic conductivity of the engineered liner and/or naturally occurring soil is so low that, even if leachate migrates from the unit, the volume of leachate that can be released to the underlying aquifer over the active life of the impoundment is so small that these releases will not result in adverse effects at any point in the future"(Part B Preamble, p. 72508). In

⁴⁸ 40 C.F.R. § 257.71 (a)(1)(i)

addition, the data presented in the application does not represent the final set of data to be used to make a Part B determination.

It has always been understood that field testing during the alternate liner demonstration will be collected in order to provide a higher density of lithologic and hydraulic conductivity data throughout the subsurface and allow more certainty on the heterogeneity and the effective hydraulic conductivity beneath the FAB. In fact, additional soil samples were collected that included additional clay-rich soil hydraulic conductivity analysis that were analyzed in accordance with the requirements of in 40 C.F.R. § 257.71(d) in December 2020 that was presented to the EPA within a preliminary ALD on November 30, 2021 (Attachment A in this letter). The additional clay-rich soil hydraulic conductivities from the samples collected in December 2020 and run with compatibility testing for two years ranged from 3.3×10^{-9} cm/s to 1.0 x 10⁻⁸ cm/s (similar to and lower than those measured in previous testing) (Attachment B). Additional details of the PALD (Attachment A), the final ALD (Attachment B) and the MONPP FAB CCR unit clay-rich soil properties are discussed below.

In the Part B preamble, EPA recognizes that natural clay-rich soils are capable of achieving the required effective hydraulic conductivities lower than 1×10^{-8} cm/s and/or on a caseby-case basis may exhibit an adequate thickness of low-conductivity soil that supports having somewhat higher soil conductivities throughout or in a portion of the soil column. As stated in the Part B preamble page 72509, "EPA identified risks slightly above the relevant risk criteria only for lithium, one of the most mobile CCR constituents. Based on these model results, an effective hydraulic conductivity of 1×10^{-8} cm/s would be sufficient to reduce identified risks to below levels of concern on a national scale. However, *conditions present at individual facilities, such as the thickness of the low-conductivity soil* or the presence of a geomembrane liner, *might support somewhat higher soil conductivities on a case-by-case basis*." In the case of the MONPP FAB, the minimum clay thickness beneath the FAB is at least 14 feet and up to 34 feet of laterally contiguous clay, more than 4x the minimum design standard thickness of 3 feet for clay-lined units outlined in the 2015 CCR Rule.

A significant amount of data was collected on the physical properties of the soil before the FAB was constructed and more was collected later as part of the monitoring well network installation that was referenced and included in the Application as appendices (including the

Detroit Edison Design Engineering March 1995 Effectiveness of the Underlying Clay Soil as a Natural Barrier On-Site, the TRC October 2017 Groundwater Monitoring Systems Summary Reports, the TRC December 2018 Natural Clay Liner Equivalency Evaluation Report and the Geosyntec Consultants November 2020 Alternate Liner Demonstration Application Support for DTE Monroe Power Plant Fly Ash Basin Documentation of Source Material and Construction Quality). Significant additional data was collected on the physical properties of the soil and presented within the November 2021 preliminary ALD (Attachment A) that it appears EPA did not consider (the PALD was submitted to EPA more than a year before rendering the Proposed Decision). The PALD has been updated by Geosyntec to include additional hydraulic conductivity data from samples that were very slow in moving to termination criteria due to the low hydraulic conductivity and is attached in the final ALD, included in Attachment B of this comment package.

The November 2021 PALD and the final ALD concludes that the low permeability natural clay soils underlying the MONPP FAB are consistently present across the FAB with a thickness of at least 14 feet and have sufficiently low hydraulic conductivity based on laboratory testing performed in accordance with the requirements of 40 C.F.R. § 257.71(d) for two years. Data show that hydraulic conductivities ranging from 3.3 x 10⁻⁹ cm/s to 1.0 x 10⁻⁸, more than sufficient to prevent groundwater contamination throughout the active life of the unit. This range of hydraulic conductivity of the glacially compacted natural clay liner system is well below the threshold to be considered for an ALD as presented in the Part B preamble page 72509 where EPA states "Regardless, a conductivity of 1×10^{-7} cm/s for the lowermost soil component of the liner, whether in isolation or beneath a geomembrane component, remains the absolute floor for any unit to even be considered for an alternate liner demonstration."

Therefore, based on the above factors, the data collected at the MONPP FAB CCR unit has demonstrated the necessary soil characteristics and engineering quality to not only satisfy the requirements of the Application, but the preliminary and final ALD satisfy the requirements of the Part B Demonstration requirements of 40 C.F.R. § 257.71(d). On this basis, there is no reasonable probability that continued operation of the FAB surface impoundment will not result in detections of CCR constituents from the CCR unit above the GWPS in the uppermost aquifer.

In addition to the comprehensive information provided in the Application and summarized above, the following additional lines of evidence generated as part of completing the ALD supports that the FAB embankment and the glacially compacted natural clay liner system beneath the FAB exceed the minimum standards of the Part B rule, and the FAB was constructed with proven and accepted engineering practices.

1. Good Quality Liner Materials and Construction

The lithology beneath the FAB consists of atop the embankment downward: (1) lean clay, (2) sandy lean clay, (3) transitional unit, and (4) bedrock. The lean clay and sandy lean clay make up the two units that comprise the natural clay liner beneath the FAB. The lean clay is associated with the engineered embankment and the sandy lean clay is associated with the unit directly beneath the FAB.

Engineered Embankment

- 1. The "History of Construction Report" (Geosyntec, 2016) details the original 1970s construction and later slope improvements. The original construction required excavation of native clay soils and placement in lifts for the embankment and compacted to 95% of optimum dry density at +1 to -2% of optimum moisture content. This has been an engineering standard of practice for over 60 years.
- 2. The embankment and native lean clay soils immediately below the embankment consists of soils that are generally classified as lean clay with sand (i.e., percent retained above sieve $#200$ is ≤30%). In a few cases, it is classified as sandy lean clay (i.e., percent retained above sieve $#200$ is $\geq 30\%$). Hereafter the embankment is referred to as "lean clay". It is approximately 40-ft thick down to an approximate elevation of 573 ft. This unit consists of mainly compacted stiff clay and minimal sand seams.
- 3. Additional soil borings and sampling and testing occurred post 1970s construction for the slope improvements (2010 through 2019) and for the ALD investigation in 2020.
- 4. The original embankment was improved by slope flattening that effectively made the embankment wider. The additional clay fill was installed under specifications based on the original construction with additional criteria. It was documented under a construction quality assurance program that included full time, independent,

inspection and testing. All of the data confirmed the good quality and consistency of the embankment soils.

Native Material Beneath the Embankment

This foundation unit (the glacially compacted natural clay liner system) is directly beneath the FAB. Thickness of this second unit ranged from 14 to 34 ft thick with an average thickness of 21 ft, increasing thickness from south to north. The sandy lean clay descriptor is consistent with ASTM D2487 Standard Practice for Classification of Soils for Engineering Purposes (Unified Soil Classification System). Based on the longterm two years of clay-rich soil hydrology compatibility testing, the hydraulic conductivity values ranged between 3.3 x 10⁻⁹ cm/s and 1.0 x 10⁻⁸ cm/s for this unit. These values are consistent with TRC's 2018 Natural Clay Liner Equivalency Evaluation Report and are adequate hydraulic conductivity values to be considered a low hydraulic conductivity unit. The final data from the ASTM D7100 testing indicated that clays within the liner will keep a consistent hydraulic conductivity value over time (as described in Section VIII.C below).

The third and fourth units identified in the conceptual site model are associated with the uppermost aquifer unit and not relevant to the liner composition. More information associated with the two liner units are provided in Section 2 of the ALD Report.

The following provides additional information that is also in the PALD and final ALD reports (Attachments A and B, respectively).

2. Detailed Site Characterization Data Affirms the Conceptual Site Model

From the 1970s through 2020, 129 borings, 95 CPTs, and 7 CCR monitoring wells were completed/installed within and around the FAB. Field and geotechnical laboratory testing, hydraulic conductivity testing, and soil descriptions were compiled from the many investigations as part of performing the ALD and summarized below (further descriptions are provided in the PALD and final ALD Reports (Attachments A and B, respectively):

Field testing included pocket penetrometer tests on fine-grained soils, in situ hydraulic conductivity tests (slug tests) for the monitoring wells screened in the uppermost aquifer, and CPTs with pore pressure dissipation tests (PPDs). Geotechnical laboratory

testing included grain size distributions, Atterberg limits, water content, dry and/or total unit weight, specific gravity, and hydraulic conductivity testing. Laboratory test results are provided in the PALD and final ALD for the 1970s, 1990s, 2016, and 2020 laboratory studies, respectively.

Data from 127 pre-2020 soil boring logs/monitoring well logs, 95 CPTs (2020), and 9 sonic borings (2020) sample descriptions were reviewed and cataloged in a database for input to the three-dimensional (3D) environmental visualization system (EVS) model using Earth Volumetric Studio software.

The EVS model was used to visualize the significant amount of data (e.g. geology, geotechnical sample locations, monitoring well and well screen locations, and groundwater elevation surfaces) to visualize the extent of the basin embankment, fly ash, and ponded water along with the geology. Lithologic cross-sections were created from the EVS model and analyzed to determine the various changes in lithology across the site, visualize model inputs, and estimate thicknesses of geologic layers. The EVS

model including five cross section outputs is presented in the PALD and final ALD and confirms that the glacially compacted natural clay liner system is continuous across the FAB CCR unit ranging from 14 to 34 ft thick with an average thickness of 21 ft, increasing thickness from south to north as shown on cross sections included in the PALD and final ALD (Attachments A and B) below. Two representative cross sections from the PALD and final ALD are included below:

As part of the 2020 ALD testing program, natural clay liner hydraulic conductivity compatibility testing was performed in general accordance with "*Standard Test Method for Hydraulic Conductivity Compatibility Testing of Soils with Aqueous Solutions*", ASTM D7100 per the Part B preamble at 72523, using site-specific contact water. Hydraulic conductivity testing was performed on 16 soil samples using deionized water in accordance with "*Standard Test Methods for Measurement of Hydraulic Conductivity of Saturated Porous Materials Using a Flexible Wall Permeameter*", ASTM D5084, to establish baseline hydraulic conductivity measurements. Then, to further cauterize the range of hydraulic conductivities, eight of the samples exhibiting high and low hydraulic

conductivity values were selected for compatibility testing in accordance with ASTM D7100 using site-specific water from the FAB (a.k.a. "contact water"). The testing was performed continuously by Excel Geotechnical Testing, Inc. located in Roswell, GA for two years for each of the samples. The final hydraulic conductivities ranged from between 3.3 x 10⁻⁹ cm/s and 1.0 x 10⁻⁸ cm/s. The longevity of the testing program was driven by the termination criteria of ASTM D7100 as fully described in the final ALD. Because of the consistency of the hydraulic conductivity results over the length of test duration (over two years), the testing demonstrated the lack of impact of contact water on the clay samples. All data associated with the hydraulic testing is summarized in detail in the PALD and final ALD Reports.

As detailed in the PALD and final ALD reports, in accordance with the demonstration requirements defined in 40 CFR § 257.71(d)(1)(ii), a fate and transport model analysis was performed to evaluate whether the peak groundwater concentrations that may result from releases to the groundwater from the FAB exceeds the GWPS at the waste boundary throughout its active life. The active life was considered to be from 1975, when operations started at the FAB, to 2041, when the Vertical Extension Landfill atop the FAB is planned to be closed, which is 67 years. Additionally, as part of the sensitivity analysis for the fate and transport model, the model was run with a modeling period of 97 years to capture the post-closure care period. The results of the model predict COC concentrations that are very low such that there is no reasonable probability that water from the FAB will cause releases to groundwater throughout its active life and post closure period of 97 years that will exceed the groundwater protection standard at the solid waste boundary.

Therefore, as presented above, the MONPP FAB CCR unit has a liner that is of good quality and in line with proven and accepted engineering practices, as required by 40 C.F.R. § 257.71(d)(1)(i)(C). This is based on:

- ― The Embankment design criteria and construction records have been shown to meet this criterion by thousands of samples and analyses, construction documentation, and the conceptual site model.
- ― The wealth of information provided in the Application and the additional supplemental information provided herein on the glacially compacted natural clay

liner system that demonstrate the performance of the soils underlying the FAB meet the Part B requirements.

― Extensive and lengthy compatibility testing of the clay embankment and underlying native clay materials demonstrate that the engineered clay embankment and glacially compacted natural clay liner system in the FAB will not degrade over time, further indicating its suitability as an alternate liner system.

The fate and transport modeling demonstrates that the water in the FAB is not expected to reach the uppermost aquifer below the FAB for at least 130 years, far beyond the active life of the FAB of 67 years and the post closure period of 30 years (97 years total). Therefore, there is no reasonable probability that continued operation of the surface impoundment will result in adverse effects to human health or the environment even using elevated (conservative) Darcy velocities/hydraulic conductivities. Therefore, the multiple lines of evidence demonstrate that the FAB has a liner that is of good quality and in line with proven and accepted engineering practices, as required by 40 C.F.R. $\S 257.71(d)(1)(i)(C)$. These data were presented in the Application and supplemented by the PALD Report (Attachment A) and are documented in the attached final ALD Report (Attachment B).

D. There is No Reasonable Risk of Additional Release Pathways Now or in the Future

There is no reasonable probability that a complete and direct transport pathway exists between the FAB and the nearby water bodies (i.e. Plum Creek and Lake Erie). Low hydraulic conductivity of the unsaturated soils (clay) with very slow horizontal travel times mitigate any potential risk for direct transport to Lake Erie or Plum Creek. The Application includes an assemblage of information such as soil hydraulic conductivity data, boring logs, cross-sections (included in Figures 3 through 5 and Appendices A, B, K, L and N of the Application) and in the November 30, 2021 preliminary ALD that EPA has had in their possession since November 2021 (Attachment A), in addition to the final ALD included in Attachment B, that show there is no highly transmissive soil between the impoundment and the nearby surface water bodies. Soil properties of the clay material included in the Application indicate travel times of more than 130-years through the clay to the uppermost aquifer. Horizontal travel times would be even longer through the clay due to the greater distance (on the order of 200+ feet at closest points) from Plum Creek and/or Lake Erie. In

addition, as discussed further below, the information presented in the PALD and ALD (Attachments A and B) further supports the ability of the clay to prevent groundwater movement through the clay-rich unsaturated zone to Plum Creek or/or Lake Erie.

In addition to the comprehensive information provided in the Application, the following additional information clarifies how there is no potential for an overtopping flow release and there is no flowing water seepage through the perimeter embankment or below the embankment through the native clay soil that there could be a complete and direct transport pathway to the nearby surface water bodies that has not been identified through the high resolution site characterization investigations that have been performed to date.

The FAB is bounded by Dunbar Road and Plum Creek to the north and northeast, Interstate 75 to the west, a 200-acre peninsula into Lake Erie to the east, Lake Erie to the southeast, and a large open field and State recreation area to the south. At the closest points, the FAB is located 200 ft south of Plum Creek and approximately 250 ft northwest of Lake Erie.

The FAB embankment is constructed of low hydraulic conductivity clay as much as 46 ft above surrounding grade that was properly designed and constructed as detailed in Appendices F, H, and L of the Application. The EPA appears to imply that the above grade construction contributes to creating a potential transport pathway through the subsurface directly to surface water and therefore does not meet the CCR rule criterion. When considering the CCR Rule and the EPA's comment, the pathway could be either through the embankment, the subsoils below the embankment above the uppermost aquifer, or through overtopping the embankment to surface water. These potential transport pathways do not exist at the FAB.

Operational controls and storage capacity avoid the potential for CCR and water from within the FAB to overtop the embankment. The lowest elevation of the FAB embankment crest is approximately elevation 613 ft, MSL. The FAB is operated using a gated discharge spillway so that the maximum elevation of the FAB water level is elevation 609 ft. Review of operating records for the annual inspections indicate the maximum operating surface water elevation of 609.0 ft is consistently met. Hydraulic modeling of the probable maximum flood (PMF) at the FAB indicated a peak water surface elevation of 612.0 ft, which leaves

1.0 ft of freeboard.^{[49](#page-61-0)} Consequently, the potential for a transport pathway over the embankment to surface water does not exist even under the most extreme PMF condition.

As thoroughly discussed above and in the information presented in the Application the embankment soils and those soils under the embankment are of sufficiently and consistently low hydraulic conductivity to preclude impacts to the uppermost aquifer. These same characteristics restrict seepage flow that could occur either through the embankment or underlying soils that could avoid mixing with groundwater in the uppermost aquifer.

No visible seepage was observed through the embankment during the slope improvements that were made from 2010 through 2019. The improvements included removal of all vegetation, stripping all topsoil, and inspecting the subgrade for wet spots/seepage over 80% of the perimeter face of the embankment. There was no visible evidence of wet spots/seepage on the embankment. Consequently, this transport pathway to surface water is not present through the embankment.

The soils under the embankment and above the uppermost aquifer have the same low hydraulic conductivity characteristics as the embankment. The potential transport pathway would be downward and then laterally through the native clay, through a longer pathway than through the embankment, to surface water. If there was no evidence of seepage through the embankment, there would be no seepage through the underlying soils to beyond the embankment to surface water.

It could be hypothesized that the transport pathway could be complete through flow laterally below the embankment and through the native clay to the surface water without exiting at the ground surface. However, as the groundwater model has demonstrated, the water in the FAB will not impact the uppermost aquifer located beneath at least 14 feet of glacially compacted natural clay liner within the operational life of the FAB (Attachments A and B), therefore, it would not impact surface water more than 200 ft away.

The lack of a geomembrane liner has no contributing factors to somehow allowing a transport pathway. As the groundwater model has demonstrated, even without a geomembrane, the water in the FAB will not impact the uppermost aquifer located beneath

⁴⁹ Geosyntec, "Hydrologic and Hydraulic Capacity Assessment, Monroe Power Plant Ash Basin Facility, Monroe, MI", 2016

at least 14 feet of glacially compacted natural clay liner within the operational life and post closure period for the FAB (Attachments A and B), therefore, it would not impact surface water that is located at least 200 feet away.

Evaluation of all the information provided in the Application, the subsequent studies, and additional construction and operation information provided herein, the potential lateral transport pathways to surface water are highly unlikely to exist, and therefore it is unreasonable for EPA to deny the Application on grounds of a potential non-groundwater release pathway.

IX. Closing

DTE appreciates the opportunity to submit comments on the Proposed Decision and trusts that EPA will consider the science and the facts presented herein when making a final decision on the Application. Data provided by DTE as part of the Application process, and subsequent data presented in the preliminary and final ALD, as well as supplemental aquifer characterization clearly demonstrate that the CCR unit has not impacted groundwater quality, the data demonstrate compliance with the CCR rule, and the natural soils underlying the site exceed the minimum requirements of the Part B rule. On this basis, DTE opposes the Proposed Decision, firmly stands behind its CCR compliance program and believes that EPA's proposed findings of noncompliance are in error and should be reconsidered in a full accounting of the record of evidence provided herein.

ATTACHMENTS:

Attachment A

Geosyntec Consultants (Geosyntec). November 2021. Preliminary Alternative Liner Demonstration, Fly Ash Basin, Monroe Power Plant, Monroe, Michigan, Prepared for DTE Electric Company.

Attachment B

Geosyntec. April 2023. Alternative Liner Demonstration Fly Ash Basin Monroe Power Plant, Monroe, Michigan Prepared for DTE Electric Company.

Attachment C

TRC. April 2023. Additional Aquifer Characterization Report – Monroe Power Plant Fly Ash Basin CCR Unit, 7955 East Dunbar Road, Monroe, Michigan. Prepared for DTE Electric Company.

Attachment A Preliminary Alternative Liner Demonstration

November 30, 2021

Sent via email

Mr. Michael Regan, EPA Administrator United States Environmental Protection Agency 1200 Pennsylvania Avenue, NW Mail Code 50304-P Washington DC, 20460

RE: Preliminary Alternate Liner Demonstration DTE Electric Company Monroe Power Plant Fly Ash Basin Coal Combustion Residuals Unit 7955 East Dunbar Road, Monroe, Michigan

Dear Administrator Regan:

The DTE Electric Company (DTE Electric) is submitting the enclosed preliminary Alternate Liner Demonstration (ALD) to the U.S. Environmental Protection Agency (EPA) as a "place holder" and out of an abundance of caution to meet the November 30, 2021 date for submitting ALDs under the Part B rule.

As EPA has publicly acknowledged, the EPA has experienced unanticipated internal delays in reviewing and making decisions on the Part B applications that were submitted a year ago on November 30, 2020, and that this extended delay has practically eliminated the timeframe contemplated in the Part B rule for facilities to prepare their ALDs. Given this, EPA explains on their CCR Part B Implementation web page that they intend to "take actions to ensure that any facility approved to conduct a demonstration has the same amount of time anticipated by the current regulation to initiate and complete the demonstration after an approval."

DTE Electric appreciates EPA's commitment to take this corrective action and believes it is both necessary and appropriate. Regardless of the Agency's internal delays DTE Electric proceeded expeditiously with the hydrogeological site characterization and laboratory study as detailed in the September 1, 2021 extension request due to analytical limitations. The extension request detailed the compatibility laboratory testing program results as of late August 2021, and projected termination criteria to be met by November 2, 2023. EPA has not yet responded to the extension request.

The enclosed preliminary ALD prepared by Geosyntec using preliminary data, concludes that the low permeability natural clay soils underlying the Monroe Power Plant Fly Ash Basin are consistently present across the basin and have sufficiently low hydraulic conductivity to prevent groundwater contamination at the solid waste boundary through the active life of the unit.

As allowed by the agency, electronic files were submitted to Richard Huggins, Mary Jackson, Michelle Long, and Jason Mills via email. If you have any questions regarding this submittal, please contact me at 313.235.0153 or christopher.scieszka@dteenergy.com

Sincerely,

Chinter

Christopher Scieszka Project Manager, Environmental Management and Safety, DTE Energy

Enclosure

cc: Richard Huggins, Mary Jackson, Michelle Long, and Jason Mills

Prepared for

DTE Electric Company One Energy Plaza Detroit, Michigan 48226

PRELIMINARY ALTERNATIVE LINER DEMONSTRATION FLY ASH BASIN MONROE POWER PLANT

Monroe, Michigan

Prepared by

Geosyntec^p consultants

engineers | scientists | innovators

2100 Commonwealth Avenue, Suite 100 Ann Arbor, Michigan 48105

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1. INTRODUCTION

This report has been prepared to provide the Preliminary Alternate Liner Demonstration (ALD) of Monroe Fly Ash Basin (FAB) coal combustion residuals (CCR) unit in accordance with 40 CFR Part 257 as amended on November 20, 2020 (CCR Rule). Figure 1-1 provides the site location.

The FAB is one of the two CCR units at the site, the other CCR unit is the Vertical Extension Landfill (Landfill) located at the northwest quadrant of FAB. DTE is planning to operate the Landfill through the end of 2040.

This report concludes that there is no reasonable probability that water from FAB will cause releases to groundwater throughout its active life that will exceed the groundwater protection standard (GWPS) at the waste boundary over the projected active life of the CCR unit.

1.1 Background

DTE Electric Company (DTE) submitted the Alternative Liner Demonstration Application for the FAB to the United States Environmental Protection Agency (USEPA) on November 30, 2020 [1] in accordance with the CCR Rule. In December, DTE started the field and laboratory investigation studies to meet the requirements of the CCR Rule.

One of the requirements of the CCR rule is to conduct hydraulic conductivity testing using sitespecific permeant liquid. The CCR Rule acknowledges that these tests may last a long time such that the operator of the CCR unit may need to submit an extension request for the laboratory testing program, and submit a preliminary ALD.

DTE submitted an extension request due to "analytical limitation" under a separate cover, on September 1, 2021 [2]. The extension request detailed the compatibility testing program results as of late August 2021, and projected termination criteria to be met by November 2, 2023. The EPA has not yet responded to the extension request.

1.2 Purpose

The purpose of this report is to provide the ALD approach, analysis details, and present preliminary results based on available data in accordance with the CCR Rule. Although the Part B Rule does not require the submittal of a preliminary ALD by November 30, 2021 if an extension request is submitted in accordance with $\S257.71(d)(2)(ii)(A)$, DTE is providing this preliminary ALD as a "place holder" and out of an abundance of caution and with confidence in the performance of the liner system to comply with the requirement to submit an ALD by November 30, 2021. A final ALD will be submitted in accordance with the schedule expected to be included in the forthcoming EPA decisions.

1.3 Report Organization

The remainder of this report is organized as follows:

- \bullet Section 2 provides the field and laboratory investigation details, information on site geology/hydrogeology, and conceptual site model details.
- Section 3 provides results of hydraulic conductivity testing, termination criteria details, chemistry testing of site-specific water, and discussion of results.
- Section 4 provides analysis approach, details, GWPS, and evaluation of results as to whether or not the FAB meets the ALD requirement of the CCR Rule.
- Section 5 provides a summary of the report.
- \bullet Section 6 provides certification by a qualified professional engineer.
- Section 7 provides references.

1.4 Terms of Reference

This report was prepared by Mike Coram C.P.G., Omer Bozok P.E., Jesse Varsho P.E., and reviewed by John Seymour, P.E. of Geosyntec.

2. CHARACTERIZATION OF SITE HYDROGEOLOGY

The CCR Rule requires the following:

 $\S257.71(d)(ii)(A)$ Characterization of site hydrogeology. A characterization of the variability of site-specific soil and hydrogeology surrounding the surface impoundment that will control the rate and direction of contaminant transport from the impoundment. The owner or operator must provide all of the following as part of this line of evidence:

(1) Measurements of the hydraulic conductivity in the uppermost aquifer from all monitoring wells associated with the impoundment(s) and discussion of the methods used to obtain these measurements;

(2) Measurements of the variability in subsurface soil characteristics collected from around the perimeter of the CCR surface impoundment to identify regions of substantially higher conductivity;

(3) Documentation that all sampling methods used are in line with recognized and generally accepted practices that can provide data at a spatial resolution necessary to adequately characterize the variability of subsurface conditions that will control contaminant transport;

(4) Explanation of how the specific number and location of samples collected are sufficient to capture subsurface variability if:

(i) Samples are advanced to a depth less than the top of the groundwater table or 20 feet beneath the bottom of the nearest water body, whichever is greater, and/or

(ii) Samples are spaced further apart than 200 feet around the impoundment perimeter;

(5) A narrative description of site geological history; and

(6) Conceptual site models with cross-sectional depictions of the site environmental sequence stratigraphy that include, at a minimum:

(i) The relative location of the impoundment with depth of ponded water noted;

(ii) Monitoring wells with screening depth noted;

(iii) Depiction of the location of other samples used in the development of the model;

(iv) The upper and lower limits of the uppermost aquifer across the site;

(v) The upper and lower limits of the depth to groundwater measured from monitoring wells if the uppermost aquifer is confined; and

(vi) Both the location and geometry of any nearby points of groundwater discharge or recharge (e.g., surface waterbodies) with potential to influence groundwater depth and flow measured around the unit.

2.1 Introduction

This section provides information on site geology and hydrogeology, data used in site characterization, a summary of ALD-specific field and laboratory study, and a conceptual site model built using the Environmental Visualization System (EVS).

2.2 Site Geology

The geology of Monroe County consists of primarily unconsolidated (soil) alluvium and glacial till deposits overlying bedrock. The unconsolidated material consists of shallow/surficial alluvium deposits (sand and gravel) on top of clay-rich glacial drift with some sporadic glaciofluvial deposits that range from not present to more than 150 ft thick, with an average thickness of about 50 ft [1].

In the area of the FAB CCR unit, clay-rich glacial drift directly overlays the bedrock and varies in thickness from 14- to 34-ft thick. There does not appear to be glaciolacustrine or glaciofluvial deposits as there are few sand and gravel lenses. It appears the drift was deposited directly from glacial events as there is a relatively consistent clay-rich glacial drift with minimal sands and gravels usually associated with a meltwater discharge. Bedrock in Monroe County is predominantly Devonian and Silurian-aged carbonates and includes the Antrim Shale, Traverse Group, Dundee Formation (limestone and some dolostone), Detroit River Group, Sylvania Sandstone, Bass Islands Group, and Salina Group. Monroe County's eastern boundary is Lake Erie, and in general, regional groundwater flow is to the east towards Lake Erie [1]. Much of the carbonate bedrock aquifer in Monroe County is confined and naturally artesian. Saturated bedrock of the Bass Islands Group is generally encountered from 37 to 53.5 ft below ground surface (ftbgs). Groundwater flow in the carbonate bedrock aquifer in Monroe County is primarily through secondary porosity consisting of fractures often evident along bedding-plane partings [1].

2.2.1 Fly Ash Basin Site-Specific Geology

The FAB is located about one mile southwest of the Plant near Monroe, Michigan, and is bounded on the east by Lake Erie and the Plant discharge canal, on the west by Interstate Highway 75 (I-75), on the south by an agricultural field, and on the north by residential property and Plum Creek.

The FAB is encapsulated by an embankment that is up to 46 ft higher than the surrounding ground surface. The perimeter of the embankment crest defines the outer limits of the watershed, which is the plan area of rainfall. There is no outer watershed area that flows directly into the FAB.

During the ALD investigation in December 2020, 95 cone penetration tests (CPTs) and 9 soil borings were drilled along the top of the embankment to augment existing data. Based on the data from Geosyntec's 2020 investigation, the geology was relatively consistent with previous geologic interpretations that the underlying clay-rich soil had consistently low hydraulic conductivity values. Although the geology was consistent, the naming of the clay-rich soils has been changed as described below:

- The embankment was created with the upper 10-ft of clay-rich native soils and compacted to act as a barrier along the perimeter of the FAB CCR unit. The embankment material is described as a compacted lean clay.
- Directly underlying the embankment, the native soils consist of up to approximately 15 ft thick lean clay. Under the FAB (starting at approximate elevation 563 ft¹) the geology consists of a 14 to 34 ft thickness of clay-rich soils identified as sandy lean clay. The sandy lean clay descriptor is consistent with ASTM D2487 Standard Practice for Classification of Soils for Engineering Purposes (Unified Soil Classification System) [3] and differs from previous soil descriptions.
- There is a transitional unit that also differs from previous soil descriptions and is identified as weathered bedrock and/or a mix of clay, sand and gravel. This unit is approximately 5 to 10 ft thick and directly underlays the sandy lean clay and sits atop the bedrock. This unit is wet and is considered the top of the uppermost aquifer unit which is the underlying fractured bedrock.

Further discussion of geologic descriptors of soil types is discussed in the conceptual site model (Section 2.6)

2.3 Uppermost Aquifer Field Testing and Hydrogeology

The uppermost aquifer unit begins at the top of the transition unit and originates in the underlying fractured bedrock. The aquifer within the bedrock exhibits artesian conditions. In 2016 TRC installed seven bedrock monitoring wells to the north, east, south and west of the FAB. All monitoring wells exhibit artesian conditions except MW-16-01. Monitoring well MW-16-01 is located within several hundred feet of several off-site domestic residential wells located to the

¹ Elevations are referenced to National Geodetic Vertical Datum of 1929.

north along Dunbar Road adjacent to Plum Creek that likely lower the hydraulic head in the area of MW-16-01 [1]. Wells located hydraulically upgradient of the CCR unit include MW-16-03, MW-16-04 and MW-16-05 on the southwestern and southern part of the FAB. These wells exhibit artesian conditions, in which potentiometric elevations are significantly above the ground surface (generally 10 to 15 ft above ground surface). Downgradient monitoring wells MW-16-01, MW-16-05 and MW 16-06 range from slightly artesian to not artesian (MW-16-01).

The general flow lines within the uppermost aquifer at the site are to the northeast towards Plum Creek. The average hydraulic gradient to the northeast ranges from 0.002 to 0.0025 foot/foot along the eastern part of the FAB to 0.004 to 0.005 foot/foot in the center and northwestern part of the FAB, with an overall mean of 0.004 foot/foot.

In 2016, A hydraulic conductivity of approximately 1.5E-3 cm/s was measured at CCR monitoring well MW-16-01 using a single well hydraulic conductivity test. In 2021, TRC conducted slug tests at CCR monitoring wells MW-16-02 through MW-16-07 using a modified single well hydraulic conductivity test and hydraulic conductivity ranged from 1.0E-02 cm/s to 4.5E-03 cm/s. Test results are provided in Appendix A. The monitoring well construction details are presented in Appendix B.

2.4 Summary of Data Used for Site Characterization

Data from many investigations were used to characterize the subsurface stratigraphy and soil characteristics for the site. Historical investigations included the 1970s, 1990s, and 2016 all of which are included in the initial ALD Application [1]. Data from Geosyntec's 2020 ALD Investigation were used to augment the previous data sets. In total, these investigations included 57 borings, 95 CPTs, and seven CCR monitoring wells. Figure 2-1 provides investigation locations.

Boring logs for the initial design in the 1970s through the 1990s, 2016, and 2020 field investigations are provided in Appendices C through F, respectively. These investigations were conducted within the FAB (prior to excavation in the 1970s), and outside of the FAB embankment and an extensive investigation through the embankment conducted by Geosyntec in 2020 (as described in Section 2.5).

Field testing included pocket penetrometer tests on fine-grained soils, slug tests for the monitoring wells screened in the uppermost aquifer, and pore pressure dissipation tests (PPDs) at CPT locations. Lab testing included grain size distributions, Atterberg limits, water content, dry and/or total unit weight, specific gravity, and hydraulic conductivity testing. Type of tests, standards and number of tests are summarized in Table 2-1. Laboratory test results are provided in Appendices G through J for the 1970s, 1990s, 2016, and 2020 laboratory studies, respectively.

It is Geosyntec's opinion that the combined data for the site are sufficient to capture the variability that may exist in soil conditions.

2.5 ALD-Specific Site Investigation Details

The scope of work for the ALD-Specific Site Investigation (SI) was completed in December 2020 and included drilling and sampling and advancing a CPT probe through the embankment and native soils.

The purpose of the fieldwork was to obtain nominally undisturbed samples for hydraulic conductivity testing and to augment the existing data set to characterize the alternate liner materials in accordance with the CCR Rule. Extensive previous investigations from the initial design in the 1970s to the present are discussed in Section 2.4.

Investigations were conducted at 200-ft intervals at the top of the embankment from elevation 615 ft down to 75 ft bgs to an approximate elevation of 540 ft. The nearest surface water body is Plum Creek located north of the FAB; groundwater flows towards Plum Creek. The investigation extends down to 20 ft below the bottom of Plum Creek, which is at an approximate elevation of 562 ft.

The following sections provide a summary of the fieldwork completed during the SI.

2.5.1 Cone Penetrometer Tests

Ninety-five CPTs were completed atop the embankment in 200 ft intervals to characterize FAB embankment and native soils. The CPT locations are provided in Figure 2-1. CPTs were advanced from the ground surface to refusal or down to approximately 75 ft bgs. Pore pressure dissipation (PPD) tests were conducted to estimate in-situ hydraulic conductivity at select depths; at a minimum, these tests were conducted at the elevation near where undisturbed samples were collected for laboratory hydraulic conductivity testing.

In total, 70 dissipation tests were completed at CPTs advanced on top of the embankment; however, only six locations were used for calculating hydraulic conductivity because equilibrium pore pressure was not achieved due to the long wait-time associated with the fine-grained soils. Hydraulic conductivity values ranged between 1.66E-07 cm/s and 3.29E-08 cm/s. Results are summarized in Table 2-2. CPT logs are provided in Appendix K1, and PPD tests are provided in Appendix K2.

2.5.2 Sonic Drilling

In December 2020, nine soil borings were advanced at the site to evaluate the subsurface geology, collect undisturbed samples for hydraulic conductivity testing, and collect additional soil samples

for characterization of native soils and the embankment. Soil samples were collected continuously in 2 to 10-foot sections from the ground surface to the termination of the soil boring. Geosyntec staff were present to log each boring and describe the soil samples in accordance with the Unified Soil Classification System (USCS).

Shelby tubes were collected from the FAB embankment soils, and native soils at approximately 20-ft intervals from each of the sonic borings in accordance with ASTM D1587 [4]; for hard soil samples where Shelby tube sampling was not feasible, samples were collected with a Pitcher barrel sampler in accordance with ASTM D6519 [5]. The soil borings were advanced to depths of approximately 75 ft-bgs to characterize the embankment and native soils. Sonic drilling locations are provided in Figure 2-1. Boring logs are provided in Appendix F. Soil stratigraphy is discussed in Section 2.6.

2.5.3 Laboratory Testing

A suite of index testing and hydraulic conductivity testing was conducted on select soil samples. One hundred thirty-one soil samples were collected from nine borings for hydraulic conductivity testing from depths between 5 ft and 75 ft to capture soils conditions ranging from stiff to very stiff soils. Details of hydraulic conductivity testing are provided in Section 3.

Index testing included:

- 131 Moisture Content tests (ASTM D2216)
- 8 Specific Gravity tests (ASTM D854)
- 75 Grain Size Mechanical Sieve tests (ASTM D6913)
- 8 Grain Size Hydrometer tests (ASTM D7928)
- 75 Atterberg Limits tests (ASTM D4318)

Note that these tests quantities are included in Table 2-1. Test results are provided in Appendix J.

2.6 Conceptual Site Model

A comprehensive Conceptual Site Model (CSM) was developed from all the data and an EVS model was developed for the site. Based on the EVS model, the overall CSM of the Site lithology is relatively consistent with a low hydraulic conductivity clay-rich glacial deposits with noninterconnected sand seams. Within the FAB CCR unit, the uppermost aquifer includes the bedrock and overlying transition zone. The uppermost aquifer is assumed to extend from the top of the

transitional unit to the base of the bedrock. Since it is a fractured bedrock aquifer, it is unknown the vertical extent of fractures, so it is assumed the entire bedrock beneath the FAB is fractured.

Cross-sections (Figures 2-2 through 2-7) were created from the EVS model and analyzed to determine the various changes in lithology across the site. Upon review of the transects, the lithology beneath the FAB consists of (from atop the embankment:) (1) lean clay, (2) sandy lean clay, (3) transitional unit, and (4) bedrock. These units are consistent with historical reports and TRC's November 2020, Initial Application for Alternate Liner Demonstration [1]; however, the naming of the units has been updated. Previous soil descriptions identify the main clay unit underlying the FAB CCR unit as a "silty clay". However, upon review of geotechnical analysis (including Atterberg limits, moisture content, and grain size analysis) it is clear, that according to USCS descriptors, the soil is classified as a "sandy lean clay" as shown in the summary graph below which includes data from the 2020 investigation.

USCS Soil Classification of 2020 Geotechnical Data

A second discrepancy is the identification of the transitional unit that was included in the descriptors since there appears to be some variance directly atop the bedrock. The transitional unit was encountered below the sandy lean clay and atop the bedrock and mainly consists of weathered bedrock and clay mixed with gravel, sand and silt. The uppermost aquifer was identified as the top of the transitional unit; it includes the transitional unit and bedrock. The lithology directly underlying the FAB consist of the following:

- \bullet (1) Lean clay This unit represents the compacted lean clay (i.e. embankment) and native lean clay soils immediately below the embankment; it consists of soils that are generally classified as lean clay with sand (i.e. percent retained above sieve $\#200$ is $\leq 30\%$); in few cases, it is classified as sandy lean clay (i.e. percent retained above sieve #200 is \geq 30%). Hereafter the embankment is referred to as lean clay which is approximately 40-ft thick to an approximate elevation of 573 ft. This unit consists of mainly compacted stiff clay and minimal sand seams. The embankment soils were sourced from the native lean clays.
- \bullet (2) Sandy lean clay This unit is encountered directly beneath the FAB ranges from 14 to 34 ft thick with an average thickness of 21 ft, increasing thickness from south to north and consists of low plasticity clay. There were minimal observed sand lenses and they do not appear to be interconnected. Based on the CPT dissipation data, the hydraulic conductivity values ranged between 1.66E-07 cm/s and 3.29E-08 cm/s for native soils. These values are consistent with TRC's 2018 Natural Clay Liner Equivalency Evaluation Report [1] and are adequate hydraulic conductivity values to be considered a low hydraulic conductivity unit.
- (3) Uppermost Aquifer Unit The weathered bedrock and mixed clays with sand, silt and gravel is referred to as the transitional unit and it sits atop the bedrock. The uppermost aquifer unit begins at the top of the transition unit and originates in the underlying fractured bedrock. The aquifer within the bedrock exhibits artesian conditions. At its thinnest section, the FAB has approximately 14 ft of clay-rich soil separating the bottom of the FAB from the uppermost aquifer. It is assumed the uppermost aquifer unit extends from the top of the transitional unit to the base of the bedrock which can extend to approximately 300 ft bgs [6].

3. POTENTIAL FOR INFILTRATION

The CCR Rule requires:

 $\S257.71(d)(ii)(B)$ Potential for infiltration. A characterization of the potential for infiltration through any soil-based liner components and/or naturally occurring soil that control release and transport of leachate. All samples collected in the field for measurement of saturated hydraulic conductivity must be sent to a certified laboratory for analysis under controlled conditions and analyzed using recognized and generally accepted methodology. Facilities must document how the selected method is designed to simulate on-site conditions. The owner or operator must also provide documentation of the following as part of this line of evidence:

(1) The location, number, depth, and spacing of samples relied upon is supported by the data collected in paragraph $(d)(1)(ii)(A)$ of this section and is sufficient to capture the variability of saturated hydraulic conductivity for the soil-based liner components and/or naturally occurring soil;

(2) The liquid used to pre-hydrate the samples and measure long-term hydraulic conductivity reflects the pH and major ion composition of the CCR surface impoundment porewater;

(3) That samples intended to represent the hydraulic conductivity of naturally occurring soils (i.e., not mechanically compacted) are handled in a manner that will ensure the macrostructure of the soil is not disturbed during collection, transport, or analysis; and

(4) Any test for hydraulic conductivity relied upon includes, in addition to other relevant termination criteria specified by the method, criteria that equilibrium has been achieved between the inflow and outflow, within acceptable tolerance limits, for both electrical conductivity and pH.

3.1 Soil Sample and Site-Specific Water Details

3.1.1 Soil Samples for Hydraulic Conductivity Testing

Sixteen soil samples were collected for hydraulic conductivity testing. Considering the extent of existing field investigation data, including CPTs, earlier borings, Geosyntec believes that the collected samples are sufficient to capture the variability of hydraulic conductivity in natural soils and the embankment.

3.1.2 Site-Specific Water Testing and Results

Site-specific water samples were collected from five open standpipe wells screened in CCR for geochemical analyses to assess the representative composition of an "aggressive" solution for use in the compatibility portion of the hydraulic conductivity testing. Samples were filtered through a 0.45-micron filter to evaluate dissolved concentrations. Site-specific water samples were tested for CCR Rule Appendix III and Appendix IV parameters as well as additional major cations (sodium, magnesium, potassium), anions (total alkalinity), iron, and manganese.

All water samples were found to be basic, with pH values ranging from 9.73 to 11.8 SU. Total dissolved solids (TDS) concentrations ranged from 390 to 1600 mg/L, although four of the five samples were found to have TDS concentrations < 1000 mg/L, which is defined by the United States Geological Survey (USGS) as "freshwater". Major ion compositions of these samples are illustrated on the Piper diagram in Figure 3-1. Three of the five samples suggest that the anion composition of the basin water is predominantly alkalinity, with variable contributions of sulfate. The cation composition is highly variable, with a range of calcium and monovalent cation (potassium and sodium) proportions and very little magnesium.

The analytical results are provided in Appendix L and tabulated in Table 3-1. Results were used to calculate the total ionic strength for each sample. Total ionic strength is a measure of the combined ion concentrations in a solution and can represent the salinity of a sample. Total ionic strength was calculated for each sample using geochemical modeling software Geochemist's Workbench (GWB) v12.0.4. The GWB thermodynamic dataset 'thermo.com.V8.R6_.tdat' was used for the calculations to incorporate all tested parameters. Analytical results for each parameter were input into GWB in units of milligrams per liter (mg/L) and the ionic strength of each sample was calculated in units of molality (m). All samples contained similar ionic strength values (0.0124 m to 0.0311 m) with the exception of PZ-2, which contained an ionic strength of 0.0723 m. The PZ-2 sample is considered to be the more aggressive solution and was used for the compatibility testing as described in Section 3.2.

3.2 Hydraulic Conductivity Testing Procedure and Termination Criteria

Sixteen soil samples were tested for hydraulic conductivity, k using deionized water in accordance with ASTM D5084 [7] to establish a baseline k reading. Then, eight of the samples exhibiting high and low k values were selected for compatibility testing in accordance with ASTM D7100 [8] using site-specific water. The use of ASTM D7100 is discussed in the preamble of the CCR Rule and identified to be appropriate by USEPA.

ASTM D7100 termination criteria require the following conditions:

- The ratio of outflow to inflow is between 0.75 and 1.25. The hydraulic conductivity is considered steady if four or more consecutive hydraulic conductivity measurements fall within ± 25 % of the mean value for hydraulic conductivity, $k \ge 3E-8$ cm/s or within ± 50 % for $k < 1E-8$ cm/s, and a plot or tabulation of the hydraulic conductivity versus time shows no significant upward or downward trend;
- At least two pore volumes (PV) of flow have passed through the sample; and
- pH and electrical conductivity of effluent are within 10% of that for the influent with no significant increasing or decreasing trends

3.3 Hydraulic Conductivity Test Results and Assessment

The results are provided in Appendix M as of August 20, 2021, and summarized in Table 3-2. The table provides sample ID, the start date for testing, amount of flow passed through a sample for a given duration of time, hydraulic conductivity values, and projected date for completing 2 PV of flow.

In addition, a set of figures was created for each sample providing an insight into the progression of:

- PV of flow with time.
- hydraulic conductivity with time.
- hydraulic conductivity with PV;
- pH of inflow and outflow with time; and
- Electrical conductivity (EC) with time.

The progression of different parameters is provided from Figure 3-2 through 3-41.

Overall, the hydraulic conductivity, k value of samples range between $3.5E-09$ and $1.4E-08$ (cm/s). The amount of PV of flow that has passed through the samples ranges from 0.5 to 3.3. As of August 20, 2021, three of the samples have reached the 2 PV criterion. The remaining samples are projected to reach 2 PV between September 2021 and March 2023; this is based on linear extrapolations between the PV that has passed through the sample at known dates and assumes k stays essentially constant, which is the current case.

Overall, the PV of flow is progressing steadily towards the 2 PV criterion. Hydraulic conductivity values are generally stable and can be considered steady. pH values are provided in Table 3-3. In

general, the average pH of inflow ranges from 12.7 to 12.8, and the average pH of outflow ranges from 8.3 to 8.6. The pH values of outflow are not within the 10 percent of inflow; they are projected to meet the termination criterion between July 2022 and November 2023. These dates are based on the convergence of linear extrapolations of the data.

EC values are provided in Table 3-4. In general, the average EC of inflow ranges from 4,523 to 4,840, and the average EC of outflow ranges from 1,126 to 2,060. The EC values of outflow are not within the 10 percent of inflow. Data is scattered such that the date for termination criteria is not predictable.

Table 3-5 summarizes if a sample has reached the termination criterion for PV, pH, EC, and the approximate projected date for reaching the termination criteria. As summarized in the table, samples have not reached all the termination criteria. The projected termination dates are based on the latest extrapolated date from PV and pH criteria. An accurate termination date cannot be predicted due to variation in EC.

The results do not include inflow vs outflow data. the inflow was maintained constant to provide a more stable hydraulic gradient across the sample, more accurate estimation of k , faster testing, and more control in the testing procedure. It is Geosyntec's opinion that the inflow/outflow criterion would be reached by the same time the other criteria are reached.

4. FATE AND TRANSPORT MODEL ANALYSES

The CCR Rule requires:

 $\S257.71(d)(ii)$ (C) Mathematical model to estimate the potential for releases. Owners or operators must incorporate the data collected for paragraphs $(d)(1)(ii)(A)$ and $(d)(1)(ii)(B)$ of this section into a mathematical model to calculate the potential groundwater concentrations that may result in downgradient wells as a result of the impoundment. Facilities must also, where available, incorporate the national-scale data on constituent concentrations and behavior provided by the existing risk record. Application of the model must account for the full range of site current and potential future conditions at and around the site to ensure that high-end groundwater concentrations have been effectively characterized. All the data and assumptions incorporated into the model must be documented and justified.

(1) The models relied upon in this paragraph $(d)(1)(ii)(C)$ must be well- established and validated, with documentation that can be made available for public review.

(2) The owner or operator must use the models to demonstrate that, for each constituent in appendix IV of this part, there is no reasonable probability that the peak groundwater concentration that may result from releases to groundwater from the CCR surface impoundment throughout its active life will exceed the groundwater protection standard at the waste boundary.

(3) The demonstration must include the peak groundwater concentrations modeled for all constituents in appendix IV of this part attributed both to the impoundment in isolation and in addition to background.

4.1 Introduction

A fate and transport model analysis has been performed to evaluate whether the peak groundwater concentrations that may result from releases to the groundwater from the FAB exceeds the GWPS at the waste boundary throughout its active life.

The model considers flow of CCR pore water Constituents of Concern (COC) migrating through the sandy lean clay down to the top of the uppermost aquifer (top of transition zone). The model does not consider additional migration of COC horizontally to the waste management boundary. If considered, the horizontal groundwater flux would considerably reduce the concentrations of the COC; consequently, the model presents a conservative assessment. As discussed later in Section 4.6.1 the results of the model predict COC concentrations that are very low such that there is no reasonable probability that water from FAB will cause releases to groundwater throughout its active life that will exceed the groundwater protection standard at the solid waste boundary.

4.2 Groundwater Protection Standards

Groundwater samples from TRC's 2016 and 2017 sampling events were tested for Appendix IV COCs and represent eight rounds of background groundwater data. The data were used to calculate site-specific background levels (Background) for Appendix IV COCs. Appendix N provides the memorandum describing the statistical calculations.

To develop GWPS for the ALD assessment, the federal Maximum Contaminant Level (MCL), Regional Screening Levels, and Background (whichever is higher) were evaluated and the highest value was selected as the GWPS in accordance with the CCR Rule. Where MCL are not available Regional Screening Levels were used. The ALD assessment GWPS are provided in Table 4-1.

4.3 Consideration of Background Groundwater Concentrations

The background groundwater concentrations have been considered and are a factor when developing GWPS as discussed in the previous subsection (Section 4.2). At the FAB, naturally occurring background groundwater concentrations are generally much lower than the GWPS. The predicted groundwater concentrations and peak groundwater background concentrations are further discussed in Section 4.6.1.

4.4 Leachate Quality Results

Porewater (i.e., leachate) quality samples from the FAB were collected in December of 2020 and January of 2021; samples were analyzed for Appendix IV by ALS Environmental in Holland, MI. Analytical results were compared for each parameter and the highest leachate concentration was used as the established concentration of the constituent (C_o) when calculating the predicted groundwater concentrations (PGC_t). The leachate quality data are summarized in **Table 4-2**.

In addition to the site-specific leachate concentrations, $90th$ percentile concentrations from the 2014 EPA study [9] were considered in the analysis. This data is summarized in Table 4-2.

4.5 Fate and Transport Model

4.5.1 Analysis Model

A one-dimensional fate and transport model was performed to further understand the potential for contaminant transport from the FAB to the uppermost aquifer. The model was developed with a contaminant transport process through the sandy lean clay layer under the FAB. Contaminant transport processes are discussed in Section 4.5.2.1.

The modeling program POLLUTE [10] was selected for the one-dimensional fate and transport evaluation. The data input for POLLUTE acquires all the input parameters, performs calculations

for individual transport processes, and then uses the semi-analytical solution for the various transportation process (see Section 4.4.2) to yield predicted concentrations at the various specified times and distances.

Model setup and inputs are discussed in detail in the following sections and are summarized via layers in Figure 4-1.

4.5.2 Proposed Mathematical and Associated Computer Model

4.5.2.1 Mathematical Model

The potential transport mechanisms that may occur at the FAB for the modeled layer include advection, mechanical dispersion and diffusion. For porous media, these transport mechanisms can be represented by the following one-dimensional flow equation [11]:

Equation No. 1:
$$
n\frac{\delta c}{\delta t} = nD\frac{\delta^2 c}{\delta z^2} - V_\alpha \frac{\delta c}{\delta z} - \rho K_d \frac{\delta c}{\delta t} - n\lambda c
$$

Where:

 $c =$ concentration at any point

 $D =$ coefficient of hydrodynamic dispersion in the vertical direction

 $n =$ porosity of the geologic layer

 V_{α} = Darcy velocity in the vertical direction

 K_d = distribution coefficient

 ρ = dry density of soil

 λ = decay constant of the contaminant species

 $t = time$

POLLUTE assumes that the transport phenomena are governed by Equation No. 1

4.5.2.2 Predicted Groundwater Concentrations

This model uses an initial concentration value of one (1), which represents a unit concentration of any constituent in the leachate. The results from the model can thus be used as a prediction factor for estimating the future concentration of any COC in groundwater. Multiplying the output prediction factor by the initial leachate concentration returns the predicted groundwater

concentration at the end of the model run. The following equation (Equation No. 2) illustrates this concept:

Equation No. 2: $\text{PGC}_t = \text{PF}_t * C_o$

Where:

 $PGC_t = predicted groundwater concentration after t years.$

 PF_t = prediction factored after t years, which is the output of the model.

 C_0 = established leachate concentration of the COC.

4.5.3 Fate and Transport Model Inputs

4.5.3.1 Initial Leachate or Source Concentration

The initial leachate concentration input value used was unity (1). This value is unitless because it represents unit leachate concentration of any given constituent. Therefore, the model results represent a fraction of the initial leachate concentration for any constituent.

4.5.3.2 Number of Layers and Layer Thickness

One layer was modeled at the site: the sandy lean clay layer. At the FAB, the sandy lean clay layer has an average thickness of 20.7 ft. The average thickness of the layer was derived from an isopach map generated by subtracting the surface representing the bottom of the layer from the surface representing the top of the layer and averaging the difference over the extent of the footprint of the FAB; model documentation for the average thickness can be found in Appendix O.

POLLUTE also allows layers to be subdivided into sublayers, which allows the predicted concentration distribution within a layer to be calculated. The sandy lean clay layer was divided into 10 sublayers at the FAB.

4.5.3.3 Modeling Period

The model was run for an operating period of 67 years. This modeling period captures the amount of time elapsed from 1975, when operations started, to 2041, when the Landfill is planned to be closed.

4.5.3.4 Talbot Parameters

POLLUTE uses a Laplace transform to find the solution to the advection-dispersion equation. The numerical inversion of the Laplace transform depends on the Talbot parameters. The model

provides default values for the parameters or they can be selected by the user. The default Talbot parameter were used in this demonstration [12].

4.5.3.5 Boundary Conditions

POLLUTE allows the user to select between multiple upper and lower boundary conditions. The top boundary condition typically represents the bottom of CCR unit as a potential source. The top boundary can be specified as either zero flux, constant concentration, or finite mass. A constant concentration was assumed as it results in conservative model results since it assumes that the leachate quality will remain constant at the maximum measured values over time.

The lower boundary can be specified as either zero flux, constant concentration, fixed outflow, or infinite thickness. For this model, an infinite thickness lower boundary was used; thus, the model output is a prediction factor of contaminant concentration in groundwater at the interface between the sandy lean clay layer and the underlying uppermost aquifer (the transition zone overlying the limestone bedrock).

4.5.3.6 Darcy Vertical Velocity

POLLUTE requires a Darcy velocity to be input for the model. The Darcy velocity was calculated for the FAB using a vertical gradient and the vertical hydraulic conductivity of the sandy lean clay layer. The vertical gradient was calculated using hydrogeologic data from the uppermost aquifer and the elevation of the typical operation water level in the FAB. These parameters were chosen to produce a conservative value for the Darcy velocity. Darcy velocity value of 6.08E-3 m/year was calculated for the FAB as provided in Appendix O. The hydraulic conductivity value used for the calculation of Darcy velocity is the average (geometric mean) of historical and current lab testing program for the vertical hydraulic conductivity of sandy lean clay.

4.5.3.7 Hydrodynamic Dispersion Coefficient

The vertical coefficient of hydrodynamic dispersion is a required input for each layer within the POLLUTE model. The hydrodynamic dispersion coefficient is calculated using Equation No. 3:

Equation No. 3: $D = D^* + av$

Where:

D = the hydrodynamic dispersion coefficient $(m^2$ /year);

 D^* = the effective diffusion coefficient (m²/year).

a $=$ the dispersivity (m);

 $v =$ the groundwater seepage velocity (m/year).

For this demonstration, the coefficient of hydrodynamic dispersion value (D) of 0.19 m²/year was input into the model. This value was based on the effective diffusion coefficient (D*) for chloride (0.19 m2/yr) , as calculated by Rowe et al. [13]. The coefficient of chloride was chosen as it is considered to have a high capacity for diffusion compared to other constituents of interest, this is a conservative constituent to model among the COC.

The second part of Equation 3, (av) is related to dispersion. Rowe et al. [9]. Discusses when the seepage velocity (6.08E-3 m/year) is low (i.e., clay soils), diffusion will control the parameter hydrodynamic dispersion (D) and dispersion is negligible.

4.5.3.8 Effective Porosity and Density Input

The average porosity of each model layer was estimated using laboratory data. An average of 24 percent porosity was estimated for the modeled sandy lean clay layer.

Based on empirical data provided by Sara (1994) [14], the laboratory porosity data was converted to effective porosities. An effective porosity value of 19 percent was used for the modeled sandy lean clay layer.

Density values from laboratory testing were also used to determine a suitable POLLUTE model input. The average density of 1,919 kg/m³ (119.8 pcf) was obtained from the available data.

4.5.3.9 Adsorption Coefficient and Degradation

Adsorption and degradation of constituents can play a significant role in the impedance of contaminant migration in the subsurface. Within POLLUTE, the adsorption coefficient simulates the impedance of constituents or sorption of containments in the modeled layers, while degradation simulates the breakdown of contaminants over time. Adsorption and degradation are assumed to be zero for the baseline model, which is conservative. Adsorption for Molybdenum was considered for the sensitivity analysis including; the minimum vertical flow path, extended time, increased Darcy velocity, the minimum effective porosity, and the high coefficient of hydrodynamic dispersion. For these sensitivity analyses, an adsorption coefficient of 0.0082 m3/kg was used based on [15]. More on sensitivity analyses are provided in Section 4.6.2.

4.6 Fate and Transport Analysis Results and Evaluation

4.6.1 Fate and Transport Baseline Model Results

The modeling was performed to evaluate predicted groundwater quality based on the hydrogeology of the site. The baseline model calculated a PF_t of 6.97E-3. With both the C_0 and

 PF_t established, the PGC_t (i.e., predicted concentration) was calculated and compared to established GWPS for the FAB and presented in Table 4-3. As provided in the table, the predicted groundwater quality results, both for site-specific leachate and the 90th percentile concentrations from the 2014 EPA study [9] are below the GWPS levels. In addition, the predicted concentrations were added to the highest concentrations that were measured in 2016-2017 groundwater sampling events and compared to the GWPS. The combined results from predicted concentrations and the highest measured concentrations are below the GWPS (see Table 4-3). Therefore, no impacts to groundwater above GWPS are predicted over the duration of FAB's active life.

The driving mechanism for the transport is chemical diffusion because the advective flow would take more than 130 years for a water molecule to travel from the bottom of FAB to the uppermost aquifer. Appendix O provides calculations for the time of travel.

The baseline model outputs for the FAB are included in Appendix P.

4.6.2 Sensitivity Analysis

Many of the model inputs are specific to the site. Given the potential for sampling bias, uncertainty, and natural variation, a sensitivity analysis was conducted to evaluate the impact on the variation of the model inputs. The analysis focused on changes to the model output, or PF_t , given a variation to a single model input as discussed in the following sections. A summary of the sensitivity analyses model input values is provided in Table 4-4. The resulting PF_t , from each sensitivity analysis was compared to a threshold prediction value, PF_{threshold}. The PF_{threshold} value represents the PF_t at which impacts to groundwater are predicted for Appendix IV COCs at the top of the uppermost aquifer under the CCR unit; the threshold value is $1.06E-2$ for the FAB. PF_{threshold} is calculated using the Equation No. 4:

Equation No. 4: PF_{threshold} = min
$$
\left\{\frac{GWPS_1}{C_1}, \frac{GWPS_2}{C_2}, ..., \frac{GWPS_i}{C_i}, ..., \frac{GWPS_n}{C_n}\right\}
$$

Where:

4.6.2.1 Darcy Velocity

A sensitivity analysis was completed to evaluate the impact of Darcy velocity. A Darcy velocity double the baseline value, which is 1.22E-02 m/year was used as input to the sensitivity analysis.

4.6.2.2 Coefficient of Hydrodynamic Dispersion

Model sensitivity to the coefficient of hydrodynamic dispersion was evaluated by increasing and decreasing the input value by 25%. The initial input value was derived from testing completed by Rowe et al., 2004) [13], and thus a 25% increase and decrease are considered a satisfactory variation for sensitivity analysis.

4.6.2.3 Porosity and Effective Porosity

Model sensitivity to the porosity and effective porosity was evaluated by increasing and decreasing the input value by the minimum and maximum range of values calculated from the laboratory results, which are 14 percent and 31 percent, respectively. Model sensitivity to the porosity and effective porosity was evaluated by increasing and decreasing the input value by the minimum and maximum range of values calculated from the laboratory results, which are 14 percent and 31 percent, respectively.

4.6.2.4 Layer Thickness

The isopach map was used to calculate the maximum and minimum thickness for the sandy lean clay layer (see Appendix O). Using the minimum and maximum thickness values as inputs, two additional models were run for FAB to evaluate model sensitivities to layer thickness; in each model, only the thickness variable was changed.

4.6.2.5 Modeling Period

The modeling period used was 67 years (the "baseline"). To further evaluate the impact of modeling runtime on the resultant PF_t , one model was run with a modeling period of 97 years to capture post-closure care time period.

4.6.2.6 Sensitivity Results

Additional fate and transport model runs were completed to evaluate model sensitivities to changing model inputs. The resulting PF_t , from each sensitivity analysis was compared to a threshold prediction value, $PF_{threshold}$. As shown in **Table 4-5,** using more conservative model input parameters resulted in PF_t values ranging from 7.18E-50 to 1.96E-3, all of which are less than the threshold value. Thus, this sensitivity analysis demonstrates that the FAB is not predicted to impact groundwater quality based on conditions more conservative than the baseline scenario. The sensitivity modeling results are presented in Table 4-5 whereas the model outputs are included in Appendix P.

4.6.3 Reliability of Computer Model

The computer-based transport model used for this analysis is based on rigorous and proven analytical solutions to the advection-dispersion equation for layered deposits. These equations were derived with the intent of modeling the physical and chemical transport of contaminants from waste impoundments. Widespread use, comprehensive documentation, and abundant publications (Talbot, 1979 [12]; Rowe, 1987 [16]; Rowe and Booker, 1987 [17]; Rowe, 1988 [11]; and Rowe and Booker, 1989 [18]) lend to the versatility of this modeling approach for assessing groundwater impacts. The outputs obtained from models conducted in POLLUTE can be compared to those obtained using other approaches to solving the advection-dispersion equation.

4.6.4 Degree of Conservativeness in Model Results

Input parameters for the baseline models were based on site-specific data whenever possible. When not possible, input values were derived from an understanding of the site and relevant peerreviewed literature. If a high degree of uncertainty was present, conservative input values were selected. A summary of the various conservative assumptions is listed below:

- The maximum measured leachate (i.e., porewater) concentration for each constituent was used for the fate and transport model prediction table;
- Constant leachate concentration or a constant mass was used for the entire modeling period. A specific mass could have been assumed for modeling purposes which would have resulted in decreased leachate concentrations over time but to be conservative the model assumed constant leachate concentration over time;
- Adsorption can significantly reduce the concentrations of metal constituents as they move through soils, especially clays, which would retard or slow down the migration. The baseline model and about half of the sensitivity analyses, the model assumed no adsorption would occur over time;
- Degradation of leachate (input values) through the either biologic or chemical process was assumed not to occur during the modeling period. By assuming no degradation, the model overestimated the predicted groundwater quality over time; and
- The CCR Rule requires compliance at the waste boundary. The analysis only considers vertical flow from the bottom of FAB to the top of the uppermost aquifer; the analysis does not consider a 2-D flow towards the waste boundary, which would further lower the predicted concentration levels for COCs.

5. SUMMARY

This Preliminary ALD has been prepared to assess if the FAB meets the ALD requirements per the CCR Rule. The data included comprehensive field and laboratory investigation data collected from the 1970s to 2020. The 2020 field and laboratory investigation studies were conducted specifically to augment the existing data and to address the CCR Rule requirements. The data were integrated into an EVS model to create a comprehensive CSM to understand the FAB lithology beneath the CCR unit and establish the basis for the Fate and Transport analysis. The EVS model was relatively consistent with historic representations of the geology associated with the FAB.

Site-specific water was collected from different wells screened in CCR and tested to assess which had the more aggressive water. Water from PZ-2 was deemed to be more aggressive and used for compatibility testing to estimate the impacts on the hydraulic conductivity of soil samples. The testing program is still underway.

A comprehensive subsurface stratigraphy model was created using the augmented data set and processing it through the EVS. Following, Fate and Transport analysis was conducted with PZ-2 chemistry data to assess whether there is a reasonable probability that water from the FAB may result in releases to groundwater throughout its active life that will exceed the GWPS at the waste boundary.

The Fate and Transport analysis was conducted for the operating time period of 67 years ("baseline"), which captures the amount of time elapsed from 1975, when CCR unit operations started, to 2041, when the existing Landfill is planned to be closed.

The analysis considered different contaminant transport mechanisms including, advection, dispersion, and diffusion. The analysis indicates that advective flow would take more than 130 years for a water molecule to travel from the bottom of FAB to the uppermost aquifer. Therefore, the analyses results indicate that, due to the low permeability nature of the in-situ unconsolidated materials, chemical diffusion is the dominant transport mechanism as opposed to advection or seepage flow. Consequently, the current hydraulic conductivity testing described in Section 3 is sufficient to characterize hydraulic conductivity and demonstrate the performance of the alternate liner system as it relates to advection or seepage flow. It is highly unlikely that running the samples until they achieve termination criteria would change the outcome of this study, and therefore, the tests do not need to extend until November 2023.

In addition, the Fate and Transport analysis was augmented with a sensitivity analysis to account for sampling bias, uncertainty, and natural variation in site-specific inputs. Predicted groundwater concentrations for both the baseline and sensitivity analyses are below GWPS. The analyses results show that there is no reasonable probability that water from the FAB will cause releases to

groundwater that will exceed the GWPS at the waste boundary over the projected active life of the CCR unit.

6. **CERTIFICATION**

CCR Unit: DTE Electric Company; Monroe Power Plant, Fly Ash Basin (FAB)

I, Omer Bozok, being a Registered Professional Engineer in good standing in the State of Michigan, do hereby certify in accordance with the CCR Rule, to the best of my knowledge, information, and belief, that the information contained in this plan has been prepared in accordance with the accepted practice of engineering and that the FAB meets the requirements of the Alternative Liner Demonstration per the CCR Rule.

Omer Bozok **Printed Name** M **BOZOK ENGINEER** No. Date Signature 62010627 6201062700 Michigan June 4, 2024 **Registration Number State Expiration Date** Affix Seal

REFERENCES

- [1] TRC, "Initial Application for an Alternative Liner Demonstration -Monroe Power Plant, Fly Ash Basin Coal Combustion Residuals Unit," November 2020.
- [2] G. C. &. E. G. Testing, "Extension Request for Belle River Power Plant Bottom Ash Basin Alternative Liner Demonstration," September 2021.
- [3] A. D2487, "Standard Practice for Classification of Soils for Engineering Purposes (Unified Soil Classification System)," 2010.
- [4] ASTM, "Standard Practice for Thin-walled Tube Sampling for Fine-grained Soils ASTM D1587," 2015.
- [5] ASTM, "Standard Practice for Sampling of Soil Using Hydraulicly Operated Stationary Piston Sampler - ASTM D6519," 2015.
- [6] F. Leverette and F. B. Taylor, "The Pleistocene of Indiana and Michigan and the history of the Great Lakes," U. S. Geological Survey, vol. LIII, p. 529, 1915.
- [7] A. D5084, "Standard Test Methods for Measurement of Hydraulic Conductivity of Saturated Porous Materials Using a Flexible Wall Permeameter," 2016.
- [8] A. D7100, "Standard Test Method for Hydraulic Conductivity Compatibility Testing of Soils with Aqueous Solutions," 2020.
- [9] USEPA, "HUMAN AND ECOLOGICAL RISK ASSESSMENT OF COAL COMBUSTION RESIDUALS," Regulation Identifier Number: 2050-AE81, 2014.
- [10] R. K. J. R. B. a. M. J. F. Rowe, "POLLUTEv7.13," GAEA Technologies, Ltd., Windsor, Ontario, Canada, 2007.
- [11] R. Rowe, "Contaminant Migrating Through Groundwater: The Role of Analysis in The Design of Barriers," Canadian Geotechnical Journal, 25(4), pp. 778-798, 1988.
- [12] A. Talbot, "The accurate numerical integration of La place transforms," J. Inst. Math's. Applics., 23, pp. 97-120, 1979.

- [13] R. K. R. M. Q. R. B. a. J. R. B. Rowe, "Clayey Barrier Systems for Waste Disposal Facilities," London, England, 2004.
- [14] M. N. Sara, "Standard Handbook for Solid and Hazardous Waste Facility Assessments," Lewis Publishers, U.S., 1994.
- [15] I. A. E. Agency, "Handbook of Parameter Values for the Prediction of Radionuclide Transfer in Temperature Environments," Vienna, 1994.
- [16] R. Rowe, "Pollutant transport through barriers," Proceedings of ASCE Specialty Conference, Geotechnical Practice for Waste Disposal, pp. 159-181, Ann Arbor, June 1987.
- [17] R. a. B. J. Rowe, "An efficient analysis of pollutant migration through soil, Chapter 2 in the book "Numerical Methods for Transient and Coupled Systems"," Eds. Lewis, Hinton, Bettess and Schrefler. John Wiley & Sons Ltd., pp. 13-42, 1987.
- [18] R. a. B. J. Rowe, "Contaminant migration through a liner underlain by fractured till and an aquifer," Geotechnical Research Center Report GEOT-12-89; Faculty of Engineering Science, U.W.O., 1989.

TABLES

Table 2-1 – Field and Lab Testing Summary

CPT ID	Lithology Unit	Test Elevation (f ^t)	Hydraulic Conductivity (cm/s)
CPT20-028	Native	564.9	6.98E-07
CPT20-028	Native	559.9	2.77E-08
CPT20-048	Native	565.0	1.84E-07
CPT20-048	Native	559.9	2.41E-08
CPT20-130	Native	565.0	1.66E-07
CPT20-136	Native	549.1	3.29E-08

Table 2-2 – Dissipation Tests Results

Sample ID	Units	$PZ-1$	$PZ-2$	$PZ-3$	$PZ-4$	$PZ-5$
Alkalinity, Total (as $CaCO3$)	mg/L	460	1400	580	170	130
Antimony	mg/L	0.01 U	0.01 U	0.01 U	0.01 U	0.0092
Arsenic	mg/L	0.0158	0.0129	0.0079	0.218	0.058
Barium	mg/L	4.6	1.2	2.8	0.189	0.207
Beryllium	mg/L	0.00222	0.00224	0.004	0.00244	0.004
Boron	mg/L	11	8.9	6.3	4.9	24
Cadmium	mg/L	0.00217	0.004	0.004	0.0022	0.00169
Calcium	mg/L	230	74	187	111	550
Chloride	mg/L	48	32	34	37	26
Chromium	mg/L	0.0067	0.0082	0.0066	0.0075	0.01
Cobalt	mg/L	0.00569	0.00268	0.0055	0.0059	0.00534
Fluoride	mg/L	3.6	23	1.2	0.83	0.4
Iron	mg/L	0.62	0.95	0.51	0.77	0.21
Lead	mg/L	0.0062	0.0072	0.00593	0.0073	0.01

Table 3-1 – Ionic Strength of Filtered Pore Water

Notes:

U - Analyzed but not detected above the method detection limit. The method detection limit is shown.

ID	Date	Days After Injection	Permeability (cm/s)	Pore Volumes Passed After Injection	Days to Target Pore Volume	Date of Target PV Reached
B2-ST-1 (20-22')	2/19/2021	$\mathbf{0}$	5.9E-09	0.0000		
	8/20/2021	182	5.4E-09	1.0116	178	2/13/2022
B4-ST-2 (40-42')	2/26/2021	$\overline{7}$	3.6E-09	0.0176		
	8/20/2021	182	3.5E-09	0.4894	560	3/3/2023
B4-ST-4 (70-72.5')	2/26/2021	$\overline{7}$	1.4E-08	0.1220		
	8/20/2021	182	$1.1E-08$	2.7318	Complete	7/2/2021
$B6-ST-1(25-27)$	2/19/2021	$\mathbf{0}$	9.7E-09	0.0000		
	8/20/2021	182	7.6E-09	1.2755	103	12/1/2021
B6-ST-3 (55-57.5')	2/19/2021	$\mathbf{0}$	$1.2E-08$	0.0000		
	8/20/2021	182	9.8E-09	1.8601	14	9/2/2021
B6-ST-4 $(65-67.5)$	2/26/2021	$\overline{7}$	1.3E-08	0.1209		
	8/20/2021	182	1.0E-08	2.5584	Complete	7/12/2021
B9-ST-2 (40-42')	2/19/2021	$\overline{0}$	1.1E-08	0.0000		
	8/20/2021	182	$1.1E-08$	1.8013	20	9/9/2021
B9-ST-3 (55-57')	3/19/2021	28	1.7E-08	0.5500		
	8/20/2021	182	1.4E-08	3.3033	Complete	6/10/2021

Table 3-2 – Hydraulic Conductivity Test Results Summary
Table 3-3 – Summary of pH Results

Sample ID	Parameter	EC Inflow $(\mu s/cm)$	EC Outflow $(\mu s/cm)$	Is EC of outflow within termination boundaries?	Approximate Projected Termination Date		
	Min	4300	1434				
B2-ST-1 (20-22')	Max	4800	3000	N _o	N/A		
	Average	4553	2059				
	Min	4840	1126				
B4-ST-2 (40-42')	Max	4840	1126	N _o	N/A		
	Average	4840	1126				
	Min	4120	1082				
B5-ST-4 (70-72.5')	Max	5230	1534	N _o	N/A		
	Average	4650	1211				
	Min	4370	1000				
B6-ST-1 (25-27')	Max	5040	1614	N _o	N/A		
	Average	4735	1384				
	Min	4350	1128				
$B6-ST-3(55-57.5')$	Max	4900	1683	N _o	N/A		
	Average	4730	1342				
	Min	3970	963				
$B6-ST-4(65.67.5')$	Max	5090	1708	N _o	N/A		
	Average	4522	1201				
	Min	4380	1025				
B9-ST-2(40-42')	Max	4940	1796	N _o	N/A		
	Average	4692	1232				
	Min	4230	885				
B9-ST-3(55-57')	Max	5080	2430	N _o	N/A		
	Average	4811	1378				

Table 3-4 – Summary of Electrical Conductivity Results

Table 3-5 – Sample Condition as it Relates to Termination Criteria

		GWPS Selection			MW-16-01		MW-16-02		MW-16-03	MW-16-04		MW-16-05		MW-16-06		MW-16-07	
Constituents	Unit		MCL/RSL	UTL	GWPS	UTL	GWPS	UTL	GWPS	UTL	GWPS	UTL	GWPS	UTL	GWPS	UTL	GWPS
Antimony	mg/L	MCL	6.0E-03	$2.1E-03$	6.0E-03	2.0E-03	6.0E-03										
Arsenic	mg/L	MCL	1.0E-02	5.0E-03	1.0E-02	5.0E-03	1.0E-02	5.0E-03	1.0E-02	5.0E-03	1.0E-02	5.0E-03	1.0E-02	5.0E-03	1.0E-02	5.0E-03	$1.0E-02$
Barium	mg/L	MCL	$2.0E + 00$	$2.2E-02$	$2.0E + 00$	1.0E-02	$2.0E + 00$	$2.1E-02$	$2.0E + 00$	1.3E-02	2.0E+00	1.8E-02	$2.0E + 00$	3.4E-02	$2.0E + 00$	1.0E-02	$2.0E + 00$
Beryllium	mg/L	MCL	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03
Cadmium	mg/L	MCL	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03
Chromium	mg/L	MCL	1.0E-01	2.0E-03	1.0E-01	2.0E-03	1.0E-01	$3.1E-03$	1.0E-01	2.0E-03	1.0E-01	2.0E-03	1.0E-01	2.0E-03	1.0E-01	2.0E-03	1.0E-01
Cobalt	mg/L	RSL	6.0E-03	1.0E-03	6.0E-03	1.0E-03	6.0E-03	1.0E-03	6.0E-03	1.0E-03	6.0E-03	1.0E-03	6.0E-03	1.6E-03	6.0E-03	1.0E-03	6.0E-03
Fluoride	mg/L	MCL	4.0E+00	1.8E+00	4.0E+00	$1.8E + 00$	4.0E+00	$1.7E + 00$	$4.0E + 00$	$1.1E + 00$	$4.0E + 00$	1.7E+00	4.0E+00	$1.8E + 00$	$4.0E + 00$	1.8E+00	$4.0E + 00$
Lead	mg/L	RSL	1.5E-02	1.0E-03	1.5E-02	1.0E-03	1.5E-02	2.5E-03	1.5E-02	1.0E-03	1.5E-02	1.0E-03	1.5E-02	1.1E-03	1.5E-02	1.0E-03	1.5E-02
Lithium	mg/L	Background or RSL	4.0E-02	$9.2E-02$	$9.2E-02$	1.2E-01	1.2E-01	1.3E-01	1.3E-01	2.3E-02	4.0E-02	5.0E-02	5.0E-02	1.0E-01	1.0E-01	4.3E-02	4.3E-02
Mercury	mg/L	MCL	2.0E-03	2.0E-04	2.0E-03	2.0E-04	2.0E-03	2.0E-04	2.0E-03	2.0E-04	2.0E-03	2.0E-04	$2.0E-03$	2.0E-04	2.0E-03	2.0E-04	2.0E-03
Molybdenum	mg/L	RSL	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01
Radium-226/228	pCi/L	MCL	$5.0E + 00$	$1.3E + 00$	5.0E+00	$4.0E + 00$	$5.0E + 00$	$3.0E + 00$	$5.0E + 00$	$1.2E + 00$	$5.0E + 00$	$2.7E + 00$	$5.0E + 00$	$1.1E + 00$	5.0E+00	$1.4E + 00$	$5.0E + 00$
Selenium	mg/L	MCL	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02
Thallium	mg/L	MCL	2.0E-03	1.0E-03	2.0E-03	1.0E-03	2.0E-03	1.0E-03	2.0E-03	1.0E-03	2.0E-03	1.0E-03	2.0E-03	1.0E-03	2.0E-03	1.0E-03	2.0E-03

Table 4-1 – Groundwater Protection Standards

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

ug/L = micrograms per liter

mg/L = milligrams per liter

Table 4-2 –Baseline Fate and Transport Results

Notes:

* = Laboratory RL is used here; all analyses were below the RL.

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

ug/L = micrograms per liter

mg/L = milligrams per liter

Table 4-3 - MW-16-01 Background and Maximum Predicted Concentrations Compared against GWPS

					MW-16-01		
					Data		
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail
			(A)	(B)	$(A+B)$		
Antimony	mg/L	MCL	$2.1E-03$	$2.0E-06$	$2.1E-03$	6.0E-03	Pass
Arsenic	mg/L	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass
Barium	mg/L	MCL	2.3E-02	8.4E-04	2.4E-02	2.0	Pass
Beryllium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass
Cadmium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass
Chromium	mg/L	MCL	2.0E-03	$3.1E-06$	2.0E-03	0.10	Pass
Cobalt	mg/L	RSL	1.0E-03	1.0E-06	1.0E-03	6.0E-03	Pass
Fluoride	mg/L	MCL	1.80	9.6E-03	1.81	4.0	Pass
Lead	mg/L	RSL	1.0E-03	$2.1E-06$	1.0E-03	1.5E-02	Pass
Lithium	mg/L	Background	7.8E-02	1.4E-04	7.8E-02	$9.2E-02$	Pass
Mercury	mg/L	MCL	2.0E-04	8.0E-08	2.0E-04	2.0E-03	Pass
Molybdenum	mg/L	RSL	1.0E-02	3.8E-03	1.4E-02	0.10	Pass
Radium-226/228	pCi/L	MCL	8.5E-04	7.6E-04	1.6E-03	5.0E-03	Pass
Selenium	mg/L	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass
Thallium	mg/L	MCL	1.0E-03	3.0E-07	1.0E-03	2.0E-03	Pass

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

Table 4-3 - MW-16-02 Background and Predicted Concentrations Compared against GWPS

Notes:

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

Table 4-3 - MW-16-03 Background and Predicted Concentrations Compared against GWPS

			MW-16-03											
					Data									
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail							
			(A)	(B)	$(A+B)$									
Antimony	mg/L	MCL	2.0E-03	2.0E-06	2.0E-03	6.0E-03	Pass							
Arsenic	mg/L	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass							
Barium	mg/L	MCL	$2.1E-02$	8.4E-04	$2.2E-02$	$2.0E + 00$	Pass							
Beryllium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass							
Cadmium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass							
Chromium	mg/L	MCL	$3.1E-03$	$3.1E-06$	$3.1E-03$	1.0E-01	Pass							
Cobalt	mg/L	RSL	1.0E-03	1.0E-06	1.0E-03	6.0E-03	Pass							
Fluoride	mg/L	MCL	1.60	9.6E-03	$1.6E + 00$	$4.0E + 00$	Pass							
Lead	mg/L	RSL	2.5E-03	$2.1E-06$	2.5E-03	1.5E-02	Pass							
Lithium	mg/L	Background	$1.2E - 01$	1.4E-04	$1.2E-01$	$1.3E-01$	Pass							
Mercury	mg/L	MCL	2.0E-04	8.0E-08	2.0E-04	2.0E-03	Pass							
Molybdenum	mg/L	RSL	1.0E-02	3.8E-03	1.4E-02	$1.0E-01$	Pass							
Radium-226/228	pCi/L	MCL	5.8E-04	7.6E-04	1.3E-03	5.0E-03	Pass							
Selenium	mg/L	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass							
Thallium	mg/L	MCL	1.0E-03	3.0E-07	1.0E-03	2.0E-03	Pass							

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

Table 4-3 - MW-16-04 Background and Predicted Concentrations Compared against GWPS

			MW-16-04											
					Data									
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail							
			(A)	(B)	$(A+B)$									
Antimony	$\mathbf{0}$	MCL	2.0E-03	2.0E-06	2.0E-03	6.0E-03	Pass							
Arsenic	GWPS	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass							
Barium	6	MCL	$1.1E-02$	8.4E-04	$1.2E-02$	$2.0E + 00$	Pass							
Beryllium	10	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass							
Cadmium	2000	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass							
Chromium	$\overline{4}$	MCL	2.0E-03	$3.1E-06$	2.0E-03	1.0E-01	Pass							
Cobalt	5	RSL	1.0E-03	1.0E-06	1.0E-03	6.0E-03	Pass							
Fluoride	100	MCL	1.10	9.6E-03	$1.1E + 00$	$4.0E + 00$	Pass							
Lead	6	RSL	1.0E-03	$2.1E-06$	1.0E-03	$1.5E-02$	Pass							
Lithium	4	RSL	$2.1E-02$	1.4E-04	$2.1E-02$	4.0E-02	Pass							
Mercury	15	MCL	2.0E-04	8.0E-08	2.0E-04	2.0E-03	Pass							
Molybdenum	40	RSL	1.0E-02	3.8E-03	1.4E-02	$1.0E-01$	Pass							
Radium-226/228	pCi/L	MCL	9.7E-04	7.6E-04	1.7E-03	5.0E-03	Pass							
Selenium	100	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass							
Thallium	5	MCL	1.0E-03	3.0E-07	1.0E-03	2.0E-03	Pass							

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

Table 4-3 - MW-16-05 Background and Predicted Concentrations Compared against GWPS

			MW-16-05										
					Data								
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail						
			(A)	(B)	$(A+B)$								
Antimony	mg/L	MCL	2.0E-03	2.0E-06	2.0E-03	6.0E-03	Pass						
Arsenic	mg/L	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass						
Barium	mg/L	MCL	1.4E-02	8.4E-04	1.5E-02	$2.0E + 00$	Pass						
Beryllium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass						
Cadmium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass						
Chromium	mg/L	MCL	2.0E-03	3.1E-06	2.0E-03	1.0E-01	Pass						
Cobalt	mg/L	RSL	1.0E-03	1.0E-06	1.0E-03	6.0E-03	Pass						
Fluoride	mg/L	MCL	1.60	9.6E-03	$1.6E + 00$	$4.0E + 00$	Pass						
Lead	mg/L	RSL	1.0E-03	$2.1E-06$	1.0E-03	1.5E-02	Pass						
Lithium	mg/L	Background	4.7E-02	1.4E-04	4.7E-02	5.0E-02	Pass						
Mercury	mg/L	MCL	2.0E-04	8.0E-08	2.0E-04	2.0E-03	Pass						
Molybdenum	mg/L	RSL	$1.0E-02$	3.8E-03	1.4E-02	$1.0E-01$	Pass						
Radium-226/228	pCi/L	MCL	2.3E-03	7.6E-04	3.0E-03	5.0E-03	Pass						
Selenium	mg/L	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass						
Thallium	mg/L	MCL	1.0E-03	3.0E-07	1.0E-03	2.0E-03	Pass						

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

ug/L = micrograms per liter

mg/L = milligrams per liter

Table 4-3 - MW-16-06 Background and Predicted Concentrations Compared against GWPS

Notes:

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

Table 4-3 - MW-16-07 Background and Predicted Concentrations Compared against GWPS

			MW-16-07											
					Data									
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail							
			(A)	(B)	$(A+B)$									
Antimony	mg/L	MCL	2.0E-03	2.0E-06	2.0E-03	6.0E-03	Pass							
Arsenic	mg/L	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass							
Barium	mg/L	MCL	9.4E-03	8.4E-04	1.0E-02	$2.0E + 00$	Pass							
Beryllium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass							
Cadmium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass							
Chromium	mg/L	MCL	2.0E-03	$3.1E-06$	2.0E-03	1.0E-01	Pass							
Cobalt	mg/L	RSL	1.0E-03	1.0E-06	1.0E-03	6.0E-03	Pass							
Fluoride	mg/L	MCL	1.70	9.6E-03	$1.7E + 00$	$4.0E + 00$	Pass							
Lead	mg/L	RSL	1.0E-03	$2.1E-06$	1.0E-03	1.5E-02	Pass							
Lithium	mg/L	Background	3.9E-02	1.4E-04	3.9E-02	4.3E-02	Pass							
Mercury	mg/L	MCL	2.0E-04	8.0E-08	2.0E-04	2.0E-03	Pass							
Molybdenum	mg/L	RSL	1.0E-02	3.8E-03	1.4E-02	1.0E-01	Pass							
Radium-226/228	pCi/L	MCL	$1.1E-03$	7.6E-04	1.9E-03	5.0E-03	Pass							
Selenium	mg/L	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass							
Thallium	mg/L	MCL	1.0E-03	3.0E-07	1.0E-03	2.0E-03	Pass							

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

	Baseline	Sensitivity Analysis		Baseline	Sensitivity Analysis	Baseline	Sensitivity	Analysis	Baseline		Sensitivity Analysis	Baseline		Sensitivity Analysis	Baseline	Sensitivity Analysis	Baseline	Sensitivity Analysis
Layer Properties	Thickness (m)	Max Thickness (m)	Min Thickness (m)	Dv (m/yr)	Dv (m/yr) Doubled	CoHD	CoHD $+25%$	CoHD $-25%$	Total Porosity	Max Porosity	Min Porosity	Effective Porosity	Eff. Porosity Max	Eff. Porosity Min	Modeling Period (years)	Modeling Period (years)	Kd (m3/kg)	Kd Molybdenum (m3/kg)
Sandy Lean Clay	6.31	10.42	4.33	6.08E-03	1.22E-02	0.019	0.024	0.014	0.24	0.38	0.17	0.19	0.31	0.14	67	97		0.0082
$Dv = Vertical Darcy Velocity$																		

Table 4-4 – Sensitivity Analysis Model Inputs

Table 4-5 – Sensitivity Analysis Results Prediction Factors

** This sensitivity model run did not come to full convergence, because the prediction factor was below 10⁻⁵⁰. Therefore, the lowest calculated prediction factor was reported.

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E E' Fly Ash Basin Extent

APPENDIX A – MONITORING WELL SLUG TEST RESULTS

2016 Slug Test Results

Hydraulic Conductivity Results

DTE Electric Company Monroe Power Plant Fly Ash Basin

Monroe, Michigan

Conversion:

$$
\frac{1 \text{ cm}}{1 \text{ sec}} \times \frac{86,400 \text{ sec}}{1 \text{ day}} \times \frac{1 \text{ ft}}{30.48 \text{ cm}} = 2.83 \text{ E} + 03 \quad \frac{\text{ ft}}{\text{444 \text{ cm}}}
$$

Notes:

Slug test results calculated using the Bower-Rice (1976) Solution.

2021 Slug Test Results

2021 Hydraulic Conductivity Results Summary DTE Electric Company Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill 7955 East Dunbar Road, Monroe, Michigan

K = Hydraulic Conductivity

NA = Not applicable

WC = water column height in well

A pneumatic air slug was utilized to complete slug tests in these artesian free flowing wells in September 2021.

APPENDIX B – MONITORING WELL CONSTRUCTION DIAGRAMS

APPENDIX C - 1970's BORING LOGS

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SOIL SAMPLE DATA $\mathsf{Lob}\cdot\mathbf{B}$ Laboratory Dry Unit Sample Sample Woter Field Depth Consistency^{*} Content Weight Elev., So, No Faat $%$ by $p, c, f,$ Faut Dry Wt. Plastic $LS-1$ 2.5 570.7 Firm 21.3 $107 - 6$ 5.0 568.2 108_o <u> 15-2</u> Hard 20.7 8.40 $LS-3$ 566.2 12.4 126.1 7.0 V.Hard 8610 Hard to 7209 Bzsc $LS-4$ 10.0 133.8 | 121.] 563.2 V. Hard Firm to $LS-5$ 15.0 558.2 Stiff 12.3 | 126.6 Compact $LS-6$ $|20.0|553.2|$ VF Sand | 17.5 | 111.6 $|25.0|548.2|V.Hard$ IS-7 | 10.7 | 131.2 $\frac{1}{\frac{1}{1200}}$ Limestone Fragments 30.0 | 543.2 W/SItaCly $BS = 8$ * Laboratory consistency based upon visual examination of sample independent of field evaluation and strength determined by feboratory test, **MON 172** SOIL AND FOUNDATIONS ASSOCIATES 29563 NORTHWESTERN HIGHWAY SOUTHFIELD, MICHIGAN 48075 LOG OF TEST BORING NO. 4 TR4 PLUM CREEK PROPERTY PROPOSED FLYASH SETTLING BASIN MONROE POWER PLANT THE DETROIT EDISON COMPANE 0 ATE: \leq -7-7/ JOB NO. 128-A APPR: GAO

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ROCK CORE DIAMETER: Nx (2-1/8")

SEA
Porm
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SOIL SAMPLE DATA Laboratory $LGD - B$ Sompte Sampie Woter Dry Unit Freid Depth. Consistency⁴ Elev, Content Waight Sa. No Fest Feat $\%$ by $|$ p.c.f. Dry Wt. $LS-1$ <u>2.5 567.4 v.stiff</u> $O(186)$ $22.9 | 104.4$ 5.0 564.9 $LS-2$ 16.2 117.1 Stiff -4520 7.5 562.4 $LS-3$ 14.8 120.2 Stiff 7320 <u>10.0 559.9 v.stiff</u> $LS - 4$ $\frac{1}{2}$ \equiv $LS-5$ | 15.0 554.9 | V_{sstiff} $11.3|129.4|$ - 1188 \mathscr{N} <u>LS-6 20.0 549.9 v.stiff</u> $\,$ $LS-7$ 24.0 545.9 V. Hard $8.8|136.5$ (7280) $rac{1}{4}$ $LS-8$ 29.0 540.9 V. Hard $9.6|132.9$ 7520 $\frac{1}{\epsilon_{\text{288}}}$ <u>LS-9</u> <u>34.0535.9</u> Hard <u> 12.7 123.9</u> BS-10 36.3 533.6 Rock Frags $BS-11$ μ .2 528.7 $w/HG.C1ay$ 43.3 526.6 Core Run $18.3521.6$ <u> No.l</u> \mathcal{F} $\sqrt{30.2}$ 53.3 516.6 * Laboratory consistency based upon viewal examination of somple, Independent of field evaluation and strength determined by **Taboratory test, MON 175** SOIL AND FOUNDATIONS ASSOCIATES 29563 NORTHWESTERN HIGHWAY SOUTHFIELD, MICHIGAN 48075 LOG OF TEST BORING NO. 7 TB7 PLUM CREEK PROPERTY PROPOSED FLYASH SETTLING BASIN MONROE POWER PLANT THE DETROIT EDISON COMPANY APPR: GAO DATE: $20 - 80 - 20$ $\sqrt{108 \text{ No. } 128 - A}$

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** 1.75" O.D. ichigan Liner Sampler used through LS-7; 2.00" O.D. Meavy wall sampler used below

-OTRANSVERSE SHEARING RESISTANCE, LBS. PER SQ. FT.

 $\overline{500}$

BOO NE HALF UNCONFINED COMPRESSIVE STRENGTH, LBS. PER SQ. FT.

(BASED UPON ORIGINAL CROSS-SECTION OF SPECIMEN)

 $\overline{300}$

 $\overline{1000}$

4000

 400

200

 550 Hard Dark Gray VF SANDY SILTY CLAY, w/Some Gravel & Rock Fragments. (GLACIAL TILL) Lt.Gray Broken DOLOMITE. (Roller bit used)35.2

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LOCATION:

INSPECTOR: **DRILLER:**

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CONTRACTOR:

TOTAL DEPTH: 3512"

 570

560

Classifications by:

LOG OF SUBSURFACE PROFILE

Ground Surface Elev. = $\overline{577.3}$ Ft. (IGLD) Datum)

W/Some Sand, Traces of Gravel.

Hole dry-augered to $d=15$ ^t
Used $18^{t}6^{u}$ of 3^{u} casing.

concrete.

BORING STARTED: July 17, 1970

BORING COMPLETED: July 17, 1970

ROCK CORE DIAMETER: Where

on Sept. 9, 1970.

N-3600; W-1350

B. Singleton

waTER LEVEL in hole at indicated number of hours after completion of boring; 2.5 feet of casing in place. * PENETRATION: Number of blows required to drive

 $\frac{31 \times 100}{21 \times 100}$ coil sampler $\frac{20}{20}$ inches, using $\frac{1}{2}$

Encountered ground water;
artesian flow; initial = μ gpm,

Artesian head = $E1.589.5$ at completion;

Hole grouted $w/3$ bags of cement & 1 bag dry

No water flow during final inspection

See Test Boring Location Plan

 $J.$ O. Wanzeck $(SkFA)$

weight with $\frac{3a}{2a}$ inch free fall. Ne = Evaluated Blows/Foot

Able Drilling, Inc.

 $=$ El.590.4 after 2 hours.

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after 30 minutes = μ .1 gpm

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SOIL SAMPLE DATA L ab 8 **Laboratary Somole** Sample .
Woter Dry Uni Field Depth., Elev. Consistency[#] Content Weight Sa, No. Fast l Feat $\%$ by $|p_{\rm c,f}|\rangle$ Dry Wt 2.5 571.7 Firm 103.1 $LS-1$ 22.1 F_1 F_2^m F_3^m 5.0 569.2 $LS-2$ 25.1 102.0 7.5 566.7 1.62 $LS-3$ Stiff 23.0 101.3 $9.5|564.7|v_{\text{stiff}}$ 4560 $LS-L$ 20.8 109.0 14.5 559.7 v. Stiff $LS-5$ 12.0 128.6 1848 $\frac{1}{2}$ <u>19.0 555.2 V. Hard</u> $LS-6$ 12.1 132.6 14880 24.0 550.2 V . Hard 4432 LS-7 11.2 | 127.4 L_{S-8} 29.0 545.2 V. Hard 8.9 133.9 / 8 L + 0 * Laboratory consistency based upon visual examination of sample, independent of field evaluation and strength determined by taboratory test. . **MON 181** SOIL AND FOUNDATIONS ASSOCIATES 29563 NORTHWESTERN HIGHWAY SOUTHFIELD, MICHIGAN 48075 LOG OF TEST BORING NO. 13 TB 13 PLUM CREEK PROPERTY PROPOSED FLYASH SETTLING BASIN MONROE POWER PLANT THE DETROIT EDISON COMPANY $APRR$: $= 10$ arte ≤ 12 Jue No. 128-A

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water LEVEL in hole at indicated number of hours ofter completion of boring; _____ feet of casing in place. * PENETRATION: Number of blows required to drive $*$ inch 0.0. soil sampler \bigcirc inches, using 40 h weight with 30 inch free fall. Ne-Evaluated Blows/Foot ROCK CORE DIAMETER: $\forall x$ (2²)

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above ground surface (E1.594.8), flow was approx.37 gpm when upper casing was removed.
At completion of boring artesian water flowed at rate of 75 gpm with casing 1'8" above
ground surface.Casing capped overnite; extended

Extreme difficulty experienced in grouting hole and stopping artesian flow; used 28 mement, 7 bags of dry-mix concrete k l bag of bentonite during period of 15 hours to stop

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SOIL SAMPLE DATA Laboratory
Consistency ³⁶ Lab & Water Dry Unit Sample Somple Field Depth., Elev., Content: Weight Sa. No Fast $|$ Feet. $\frac{1}{2}$ % by $\frac{1}{2}$ p.c.f. Dry Wt. Medium 569.6 to Firm
Medium
567.1 to Firm <u>LS-1</u> 2.5 \sim \sim 5.0 $LS-2$ $\ddot{}$ $m₂$ $LS-3$ 7.5 564.6 Stiff \sim \sim $-$ IS-4 10.0 562.1 V. Stiff \rightarrow $-$ <u>15-5 15.0 557.1 V. Stiff</u> \equiv $LS-6$ 20.0 552.1 $V.$ Stiff \sim **COM** <u>LS-7 25.0 547.1</u> Hard $\frac{1}{2}$ <u>LS-8 30.0 542.1</u> 16800 <u>V. Hard 12.1 127.5</u> 18250 * Laboratory consistency based upon visual examination of sample. independent of field evaluation and strength determined by faboratory fest. **MON 190** SOIL AND FOUNDATIONS ASSOCIATES 29563 NORTHWESTERN HIGHWAY SOUTHFIELD, MICHIGAN 48075 LOG OF TEST BORING NO. 22 TB 22 PLUM CREEK PROPERTY PROPOSED FLYASH SETTLING BASIN MONROE POWER PLANT THE DETROIT EDISON COMPANY JOB NO. 128-A APPR: GA^{α} DATE: $6-7-7$

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ROCK CORE DIAMETER: None

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ROCK CORE DIAMETER: None

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ROCK CORE DIAMETER: None

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V.Stiff 13.6 125.8 $5.0567.9$ 6720 **LS-1** V.Stiff
to Hard 7.5 565.L $LS-2$ <u>13.0 125.6</u> .
د 12 13.3 124.1 $18 - 3$ <u>10,0 562.9</u> $76B₀$ Hard 12.3 125.9 12.5569 h <u> 19-4</u> Stiff 12.6 125.7 $15.0557.9$ $LS-5$ Stiff 13.4 126.2 **LS-6** $20.0552.9$ Stiff 4510 11.3 131.7 25.0 547.9 v.stiff $LS-7$ * Laboratory consistency based upon visual examination of sample independent of field evaluation and strength determined by taboratory test. **MON 202** SOIL AND FOUNDATIONS ASSOCIATES 29563 NORTHWESTERN HIGHWAY SOUTHFIELD, MICHIGAN 48075 LOG OF TEST BORING NO. 34 TB 34 PLUM CREEK PROPERTY PROPOSED FLYASH SETTLING BASIN MONROE POWER PLANT THE DETROIT EDISON COMPANY DATE: \leftarrow = - - - | JOB NO. 128-A APPR: GAP

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ROCK CORE DIAMETER: None

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APPENDIX D – 1990's BORING LOGS

SOIL BORING LOCATION DIAGRAM VERIFICATION OF SOIL BARRIER MONROE, MICHIGAN

BAY CITY KALAMAZOO LANSING PLYMOUTH **TOLEDO**

soil and materials engineers, inc.

APPENDIX E – 2016 BORING LOGS

265996-0001-000_Stat.mxd

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MONITORING WELLS

APPROXIMATE BOUNDARY OF FLY ASH BASIN

NOTES

- 1. BASE MAP IMAGERY FROM ESRI/MICROSOFT, "WORLD IMAGERY", WEB BASEMAP SERVICE LAYER.
- 2. WELL LOCATIONS SURVEYEDBY BMJ ENGINEERS AND SURVEYORS INC. IN MARCH AND MAY 2016.

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APPENDIX F - 2020 BORING LOGS

APPENDIX G – 1970's LABORATORY TEST RESULTS

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APPENDIX H – 1990's LABORATORY TEST RESULTS

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TABLE 1

LABORATORY TEST RESULTS VERIFICATION OF NATURAL SOIL BARRIER - MONROE ASH BASIN SME PROJECT NO. PG-22087

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TABLE 1

LABORATORY TEST RESULTS VERIFICATION OF NATURAL SOIL BARRIER - MONROE ASH BASIN SME PROJECT NO. PG-22087

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APPENDIX I – 2016 LABORATORY TEST RESULTS

APPENDIX J – 2020 LABORATORY TEST RESULTS

953 Forrest Street, Roswell, Georgia 30075
Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST⁽¹⁾

ASTM D5084

- 384.45%

${\hbox{\bf Notes}}$

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: $ST =$ Shelby Tube, $R =$ Remolded, $B =$ Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST (1)

ASTM D5084

2012-07-18

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: $ST =$ Shelby Tube, $R =$ Remolded, $B =$ Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST⁽¹⁾

ASTM D5084

Project Name: Project Number: Client Name: Site Sample ID: Lab Sample Number: Material Type: Specified Value (cm/sec): Date Test Started:

2012021

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: ST = Shelby Tube, R = Remolded, B = Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST⁽¹⁾

ASTM D 5084

Project Name: **Project Number: Client Name:** Site Sample ID: Lab Sample Number: **Material Type:**

Date Test Started:

Specified Value (cm/sec):

Monroe Ash Basin ALD PN1016 **Geosyntec Consultants** B4-ST-3 (55-57.5') 20L131 Soil NA 1/20/2021

rex 2021

Notes:

1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.

- 2. Specimen Type: $ST =$ Shelby Tube, $DT =$ Drive Tube $BS =$ Block Sample, Ot = Others
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075
Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST (1) **ASTM D5084**

PROPER

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: $ST =$ Shelby Tube, $R =$ Remolded, $B =$ Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST⁽¹⁾ ASTM D5084

Project Name: Project Number: Client Name: Site Sample ID: Lab Sample Number: Material Type: Specified Value (cm/sec): Date Test Started:

28-20-15

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: ST = Shelby Tube, R = Remolded, B = Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST⁽¹⁾

ASTM D5084

Project Name: Project Number: Client Name: Site Sample ID: Lab Sample Number: Material Type: Specified Value (cm/sec): Date Test Started:

2020767

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: ST = Shelby Tube, R = Remolded, B = Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST (1)

ASTM D5084

Project Name: Project Number: Client Name: Site Sample ID: Lab Sample Number: Material Type: Specified Value (cm/sec): Date Test Started:

2020207

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: $ST =$ Shelby Tube, $R =$ Remolded, $B =$ Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537 Fax: (770) 910 7538

LAST PAGE

Test Applicability and Limitations:

- The results are applicable only for the materials received at the laboratory and tested which may or may not be representative of the materials at the site.

Storage Policy:

- Uncontaminated Material: All samples (or what is left) will be archived for a period of 3 months from the date received. Thereafter the samples will be discarded unless a written request for extended storage is received. A rate of \$1.00 per sample per day will be applied after the initial 3 month storage period.

- Contaminated Material: All samples (or what is left) will be archived for a period of 3 months from the date received. Thereafter, the samples will be returned^{to} the project manager or his/her designated receiver unless a written request for extended storage is received. A rate of \$1.30 per sample per day will be applied after the initial 3 months storage.

APPENDIX K1 - CPT LOGS

Job No: 20-61-21655 Client: Geosyntec Consultants

Project: DTE Monroe Power Plan DTE Monroe Power Plant Start Date: 01-Dec-2020 14-Dec-2020

Job No: 20-61-21655 Client: Geosyntec Consultants

Project: DTE Monroe Power Plan DTE Monroe Power Plant Start Date: 01-Dec-2020 14-Dec-2020

Job No: 20-61-21655 Client: Geosyntec Consultants

Project: DTE Monroe Power Plan DTE Monroe Power Plant Start Date: 01-Dec-2020 14-Dec-2020

Job No: 20-61-21655 Client: Geosyntec Consultants Project: DTE Monroe Power Plant Start Date: 01-Dec-2020 End Date: 14-Dec-2020

1. The assumed phreatic surface was provided by the client. Hydrostatic condictions were assumed for the calculated parameters.

2. Coordinates were acquired using a MR-350 GlobalSat GPS Receiver in datum: WGS84 / UTM Zone 17 North and were converted to Michigan State Plane South, NAD83 (international feet).

3. No pore pressure data from 16.300m- 22.925m (53.48ft - 75.21ft) due to equipment issues.

4. No clear phreatic surface detected.

APPENDIX K2 – PPD TEST RESULTS

a. Time is relative to where umax occurred.

b. Houlsby and Teh, 1991.

1. The cone was left in the ground overnight and final final pore pressure readings was taken the next morning.

Sounding: CPT20-092 Cone: 675:T1500F15U500 Area=15 cm²

Duration: 210.0 s

u Final: 117.5 ft

APPENDIX L – CHEMISTRY ANALYSIS OF SITE-SPECIFIC WATER

05-Jan-2021

Geosyntec Consultants Michael Coram 2100 Commonwealth Blvd. Ann Arbor, MI 48105 Suite 100

Re: **DTE- Monroe (GLP-8014)** Work Order: **20121750**

Dear Michael,

ALS Environmental received 5 samples on 18-Dec-2020 10:00 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental - Holland and for only the analyses requested.

Sample results are compliant with industry accepted practices and Quality Control results achieved laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 26.

If you have any questions regarding this report, please feel free to contact me:

ADDRESS: 3352 128th Avenue, Holland, MI, USA PHONE: +1 (616) 399-6070 FAX: +1 (616) 399-6185

Sincerely,

Electronically approved by: Chad Whelton

Enuironmental

Project Manager Chad Whelton

Report of Laboratory Analysis

Certificate No: MN 026-999-449

ALS GROUP USA, CORP Part of the ALS Laboratory Group A Campbell Brothers Limited Company

www.alsqlobal.com

Work Order Sample Summary

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Samples for the above noted Work Order were received on 12/18/2020. The attached "Sample Receipt Checklist" documents the status of custody seals, container integrity, preservation, and temperature compliance.

Samples were analyzed according to the analytical methodology previously transmitted in the "Work Order Acknowledgement". Methodologies are also documented in the "Analytical Result" section for each sample. Quality control results are listed in the "QC Report" section. Sample association for the reported quality control is located at the end of each batch summary. If applicable, results are appropriately qualified in the Analytical Result and QC Report sections. The "Qualifiers" section documents the various qualifiers, units, and acronyms utilized in reporting. A copy of the laboratory's scope of accreditation is available upon request.

With the following exceptions, all sample analyses achieved analytical criteria.

Metals:

No other deviations or anomalies were noted.

Wet Chemistry:

Batch R306912, Method SW9040C, Sample PZ-3 (20121750-03B): Possible bias due to sodium error at pH > 10. A low sodium electrode is not used in the measurement process.

Batch R306825, Method SW9040C, Sample LCS-R306825: Samples were processed outside of holding time for pH, as the analysis is a field test and holding time is defined as 15 minutes.Batch R307145, Method IC_9056_W, Sample 20121752-03B MSD: 1

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Client: Geosyntec Consultants

Project: DTE- Monroe (GLP-8014)

Sample ID: PZ-1

Collection Date: 12/14/2020 08:00 AM **Matrix:** GROUNDWATER

Work Order: 20121750 **Lab ID:** 20121750-01

Sample ID: PZ-2

Project: DTE- Monroe (GLP-8014)

Client: Geosyntec Consultants

Work Order: 20121750 **Lab ID:** 20121750-02

Collection Date: 12/14/2020 09:00 AM **Matrix:** GROUNDWATER

Work Order: 20121750 **Lab ID:** 20121750-03

Sample ID: PZ-3

Collection Date: 12/15/2020 08:00 AM **Matrix:** GROUNDWATER

Project: DTE- Monroe (GLP-8014)

Client: Geosyntec Consultants

Sample ID: PZ-4

Project: DTE- Monroe (GLP-8014)

Client: Geosyntec Consultants

Work Order: 20121750 **Lab ID:** 20121750-04

Collection Date: 12/14/2020 10:00 AM **Matrix:** GROUNDWATER

Note: See Qualifiers page for a list of qualifiers and their definitions.

Analytical Results Page 4 of 5

Work Order: 20121750 **Lab ID:** 20121750-05

Sample ID: PZ-5

Client: Geosyntec Consultants

Project: DTE- Monroe (GLP-8014)

Collection Date: 12/15/2020 10:00 AM **Matrix:** GROUNDWATER

QC BATCH REPORT

Batch ID: 169919 Instrument ID HG4 Method: **SW7470A MBLK** Sample ID: **MBLK-169919-169919**

Client: Geosyntec Consultants **Work Order:** 20121750

Project: DTE- Monroe (GLP-8014)

Batch ID: **170071** Instrument ID **HG4** Method: **SW7470A**

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

QC BATCH REPORT

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Client: Geosyntec Consultants **Work Order:** 20121750

Project: DTE- Monroe (GLP-8014)

QC BATCH REPORT

Batch ID: **169592** Instrument ID **TDS** Method: **A2540 C-11**

Batch ID: **R306822** Instrument ID **Titrator 1** Method: **A2320 B-11**

The following samples were analyzed in this batch: 20121750-01B 20121750-02B 20121750-04B

Batch ID: **R306825** Instrument ID **Titrator 1** Method: **SW9040C**

Batch ID: **R306910** Instrument ID **Titrator 1** Method: **A2320 B-11**

The following samples were analyzed in this batch: 20121750-03B 20121750-05B

Batch ID: **R306912** Instrument ID **Titrator 1** Method: **A4500-H B-11**

Batch ID: **R307142** Instrument ID IC3 Method: **SW9056A**

Batch ID: **R307145** Instrument ID IC4 Method: **SW9056A**

Batch ID: **R307276** Instrument ID IC3 Method: **SW9056A**

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited

Copyright 2011 by ALS Environmental.

ALS Group, USA

Sample Receipt Checklist

Login Notes:

LIMS Version: 7.012

Tuesday, January 19, 2021

Michael Coram Geosyntec Consultants 2100 Commonwealth Blvd. Suite 100 Ann Arbor, MI 48105

Re: ALS Workorder: 2012398 Project Name: DTE - Monroe Project Number: GLP-8014

Dear Mr. Coram:

Five water samples were received from Geosyntec Consultants, on 12/18/2020. The samples were scheduled for the following analyses:

The results for these analyses are contained in the enclosed reports.

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, ALS certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental.

Thank you for your confidence in ALS Environmental. Should you have any questions, please call.

Sincerely,

Mir Ellija

ALS Environmental Julie Ellingson Project Manager

www.alsglobal.com

Accreditations: ALS Environmental – Fort Collins is accredited by the following accreditation bodies for various testing scopes in accordance with requirements of each accreditation body. All testing is performed under the laboratory management system, which is maintained to meet these requirement and regulations. Please contact the laboratory or accreditation body for the current scope testing parameters.

40 CFR Part 136: All analyses for Clean Water Act samples are analyzed using the 40 CFR Part 136 specified method and include all the QC requirements.

2012398

Radium-228:

The samples were analyzed for the presence of 228 Ra by low background gas flow proportional counting of ²²⁸Ac, which is the ingrown progeny of ²²⁸Ra, according to the current revision of SOP 724.

All acceptance criteria were met.

Radium-226:

The samples were prepared and analyzed according to the current revision of SOP 783.

All acceptance criteria were met.

Sample Number(s) Cross-Reference Table

OrderNum: 2012398 **Client Name:** Geosyntec Consultants **Client Project Name:** DTE - Monroe **Client Project Number:** GLP-8014 **Client PO Number:**

ţ 2. Unless outer was agreed in a formal contract, services provided by ALS Edwirommental are
3. The Chain of Custody is a legal document. All information must be completed accurately.

 \bar{z}

ALS Environmental - Fort Collins CONDITION OF SAMPLE UPON RECEIPT FORM

 $\langle \rangle$

+IR Gun #3, VWR SN 170647571 +IR Gun #5, VWR SN 192272629

SAMPLE SUMMARY REPORT

B - Result is less than the requested reporting limit but greater than the instrument method detection limit (MDL).

U or ND - Indicates that the compound was analyzed for but not detected.

E - The reported value is estimated because of the presence of interference. An explanatory note may be included in the narrative.

M - Duplicate injection precision was not met.

N - Spiked sample recovery not within control limits. A post spike is analyzed for all ICP analyses when the matrix spike and or spike duplicate fail and the native sample concentration is less than four times the spike added concentration.

Z - Spiked recovery not within control limits. An explanatory note may be included in the narrative.

* - Duplicate analysis (relative percent difference) not within control limits.

S - SAR value is estimated as one or more analytes used in the calculation were not detected above the detection limit.

Organics:

U or ND - Indicates that the compound was analyzed for but not detected.

B - Analyte is detected in the associated method blank as well as in the sample. It indicates probable blank contamination and warns the data user.

E - Analyte concentration exceeds the upper level of the calibration range.

J - Estimated value. The result is less than the reporting limit but greater than the instrument method detection limit (MDL).

A - A tentatively identified compound is a suspected aldol-condensation product.

X - The analyte was diluted below an accurate quantitation level.

* - The spike recovery is equal to or outside the control criteria used.

- + The relative percent difference (RPD) equals or exceeds the control criteria.
- G A pattern resembling gasoline was detected in this sample.
- D A pattern resembling diesel was detected in this sample.
- M A pattern resembling motor oil was detected in this sample.

C - A pattern resembling crude oil was detected in this sample.

- 4 A pattern resembling JP-4 was detected in this sample.
- 5 A pattern resembling JP-5 was detected in this sample.
- H Indicates that the fuel pattern was in the heavier end of the retention time window for the analyte of interest.
- L Indicates that the fuel pattern was in the lighter end of the retention time window for the analyte of interest.

Z - This flag indicates that a significant fraction of the reported result did not resemble the patterns of any of the following petroleum hydrocarbon products:

- gasoline
- JP-8 - diesel
- mineral spirits
- motor oil - Stoddard solvent
- bunker C

ALS -- Fort Collins **Date:** *1/19/2021 2:19:4*

Project: GLP-8014 DTE - Monroe **Client:** Geosyntec Consultants **Work Order:** 2012398

QC BATCH REPORT

Project: GLP-8014 DTE - Monroe

QC BATCH REPORT

2012398-4 2012398-5

APPENDIX M – ALD HYDRAULIC CONDUCTIVITY TEST RESULTS

Test Results Summary

Compatibility Test Results

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

Project Name: Monroe Ash Basin ALD

Test Results Summary

Compatibility Test Results

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

Project Name: Monroe Ash Basin ALD

Test Results Summary

Compatibility Test Results

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Project Name: Monroe Ash Basin ALD

Test Results Summary

Compatibility Test Results

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Project Name: Monroe Ash Basin ALD

Excel Geotechnical Testing, Inc.

"*Excellence in Testing"*

Test Results Summary

Compatibility Test Results

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

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Test Results Summary

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Test Results Summary

Compatibility Test Results

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

Project Name: Monroe Ash Basin ALD

Test Results Summary

Compatibility Test Results as of August 20, 2021

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

Project Name: Monroe Ash Basin ALD 21H21 Project No.: PN1016 R23

Appendix N Groundwater Protection Standard Calculations

DTE Electric Company (DTE Electric) is pursuing an Alternate Liner Demonstration (ALD) for the Monroe Power Plant (MONPP) Fly Ash Basin (FAB) coal combustion residual (CCR) unit. On November 12, 2020, the U.S. EPA published the Part B: Alternate Demonstration for Unlined Surface Impoundments amendments to the CCR Rule^{[1](#page-662-0)} ("Part B") that allows a facility to prepare a demonstration to request approval to operate an existing CCR surface impoundment with an alternate liner. Although the MONPP FAB remains in detection monitoring, per § 257.71(d)(1)(ii)(C)(2), the ALD must demonstrate that, for each Appendix IV constituent, there is no reasonable probability that the peak groundwater concentration that may result from releases that occur over the active life of the CCR surface impoundment will exceed the groundwater protection standard (GWPS) at the waste boundary.

GWPSs are set as either specific regulatory standards identified in the CCR Rule or background groundwater concentrations, whichever is higher, for the Appendix IV constituents. Per the CCR Rule $\S 257.95$ $\S 257.95$ $\S 257.95$ (h) 2 , the EPA maximum contaminant levels (MCLs) will be the GWPSs for those constituents that have established MCLs. For Appendix IV constituents 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 equal to the background level.

This memorandum presents the background statistical limits and GWPS derived for the Appendix IV parameters for the MONPP FAB CCR unit using the aforementioned approach pursuant to §257.95(h). Per 40 CFR §257.94, a minimum of eight rounds of background sampling for the Appendix IV constituents were completed at the MONPP FAB from August 2016 through July 2017, as part of

¹ On April 17, 2015, the U.S. EPA issued the Final Rule: Disposal of CCR from Electric Utilities (CCR Rule), 40 CFR 257, Subpart D, to regulate the disposal of CCR materials generated at coal-fired units.

² As amended per Phase One, Part One of the CCR Rule (83 FR 36435).

initiating the detection monitoring program. Since fluoride is in both the Appendix III and Appendix IV constituent lists, additional fluoride data were collected under the detection monitoring program subsequent to July 2017 and were also used in the development of the GWPS. All of the Appendix IV data used in this analysis (August 2016 through December 2020) and details on how the data were collected are included in the annual reports prepared in accordance with the CCR Rule through January 2021.

The background data for the MONPP FAB were evaluated in accordance with the *Groundwater Statistical Evaluation Plan* (Stats Plan) (TRC, October 2017). Per the Stats Plan, the MONPP FAB CCR unit uses an intra-well statistical approach. For intra-well methods, the background data set is comprised of the historical data established at each individual monitoring well, which accounts for natural spatial variability that occurs in background encountered across the site. Background data were evaluated utilizing ChemStat™ statistical software. ChemStat™ 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 ChemStat™ 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 and is an acceptable approach under the CCR Rule. As such, upper tolerance limits (UTLs) were calculated for each of the CCR Appendix IV parameters, and, given that intra-well methods have been established for this site, a background UTL was calculated for each monitoring well and used to compare to the respective MCL or RSL The following narrative describes the methods employed and the results obtained for the UTL calculations and the resulting GWPSs. The ChemStat™ output files are included as an attachment.

The set of background wells utilized for MONPP FAB includes MW-16-01 through MW-16-07. The background data evaluation included the following steps:

- Review of data quality checklists 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;
- **Dutilier testing of individual data points that appear from the graphical representations as potential** outliers;
- Evaluation of percentage of non-detects for each baseline/background well-constituent (w/c) pair;
- Distribution of the data;
- Calculation of the UTLs for each cumulative baseline/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, 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 time versus concentration (T v. C) graphs (Attachment A) do not show potential or suspect outliers for any of the Appendix IV parameters.

While variations in results are present, the graphs show consistent baseline data and do not suggest that data sets, as a whole, likely have overall trending or seasonality. However, due to limitations on CCR Rule implementation timelines, the data sets, with the exception of fluoride, are of relatively short duration for making such observations regarding overall trending or seasonality.

Outlier Testing

No outliers were identified in the T v. C graphs. Therefore, outlier testing was not applicable.

Distribution of the Data Sets

ChemStat™ was utilized to evaluate each data set for normality. If the skewness coefficient was calculated to be between negative one and one, then the data were assumed to be approximately normally distributed. If the skewness coefficient was calculated as greater than one (or less than negative one) then the calculation was performed on the natural log (Ln) of the data. If the Ln of the data still determined that the data appeared to be skewed, then the Shapiro‐Wilk test of normality (Shapiro‐Wilk) was performed. The Shapiro‐Wilk statistic was calculated on both non‐transformed data and the Ln-transformed data. If the Shapiro‐Wilk statistic indicated that normal distributional assumptions were not valid, then the parameter was considered a candidate for non-parametric statistical evaluation. The data distributions are summarized in Table 1.

Tolerance Limits

Table 1 presents the calculated UTLs for the background/baseline data sets. As discussed above, the MONPP FAB CCR unit uses intra-well statistical methods; therefore, UTLs were calculated for each individual monitoring well. For normal and lognormal distributions, UTLs are calculated for 95 percent confidence using parametric methods. For nonnormal background datasets, a nonparametric UTL is utilized, resulting in the highest value from the background dataset as the UTL. The achieved confidence levels for nonparametric tolerance limits depend entirely on the number of background data points, which are shown in the ChemStat™ outputs. The intra-well tolerance limits for each parameter were compared to the MCL/RSL and the higher value was established as the GWPS for that well.

Groundwater Protection Standards

The resulting GWPSs were established as the higher of the MCL/RSL or the UTL for each Appendix IV constituent at each monitoring well. The GWPSs are summarized in Table 2.

Attachments

Table 1 – Summary of Descriptive Statistics and Tolerance Limit Calculations Table 2 – Summary of Groundwater Protection Standards

Attachment A – ChemStat™ Outputs

Tables

Notes:

 $2.14275 > 1$ -1 < 0.537721 < 1 0.818 > 0.781314

Shapiro-Wilks 5% Critical Value

Skewness Coefficient Shapiro-Wilks 3%

PQL = Practical Quantitation Limit

ug/L = micrograms per liter

mg/L = milligrams per liter

Notes:

 $2.14275 > 1$ -1 < 0.537721 < 1 0.818 > 0.781314 Skewness Coefficient Shapiro-Wilks 3%

Shapiro-Wilks 5%

PQL = Practical Quantitation Limit

ug/L = micrograms per liter

mg/L = milligrams per liter

pCi/L = picocuries per liter

Critical Value

Notes:

 $2.14275 > 1$ -1 < 0.537721 < 1 0.818 > 0.781314 Skewness Coefficient

Shapiro-Wilks 5% -Critical Value

Shapiro-Wilks 'W' Statistic

PQL = Practical Quantitation Limit

ug/L = micrograms per liter

mg/L = milligrams per liter

Notes:

 $2.14275 > 1$ -1 < 0.537721 < 1 0.818 > 0.781314 Skewness Coefficient

Shapiro-Wilks 5% -

Critical Value

Shapiro-Wilks 'W' Statistic

PQL = Practical Quantitation Limit

ug/L = micrograms per liter

mg/L = milligrams per liter

Notes:

 $2.14275 > 1$ -1 < 0.537721 < 1 0.818 > 0.781314 Skewness Coefficient Shapiro-Wilks 3% Coefficient Shapiro-Wilks IV Statistic

Shapiro-Wilks 5% -Critical Value

PQL = Practical Quantitation Limit

ug/L = micrograms per liter

mg/L = milligrams per liter

Table 2 Summary of Groundwater Protection Standards DTE Electric Company – Monroe Fly Ash Basin

Notes:

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

ug/L = micrograms per liter

mg/L = milligrams per liter

Attachment A ChemStat™ Outputs

Lithium

Concentrations (ug/L) Parameter: Antimony Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 55 Percent Non-Detects: 98.2143% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Arsenic Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 0 Percent Non-Detects: 0% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Beryllium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Cadmium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Chromium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 55 Percent Non-Detects: 98.2143% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Cobalt Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 55 Percent Non-Detects: 98.2143% Total Background Measurements: 0 There are 0 background locations

Concentrations (mg/L) Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 105 Total Non-Detect: 0 Percent Non-Detects: 0% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Lead Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 53 Percent Non-Detects: 94.6429% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 0 Percent Non-Detects: 0% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Mercury Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Molybdenum Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (pci/L) Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 1 Percent Non-Detects: 1.78571% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Selenium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Thallium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Skewness Coefficient Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

All Locations

Skewness Coefficient Parameter: Barium Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-01 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 5.7324 Sample Standard Deviation = 2.46403 W Statistic = 0.773186

5% Critical value of 0.818 exceeds 0.773186 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 is less than 0.773186 Data is normally distributed at 99% level of significance

Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-01 Normality Test of Parameter Concentrations Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 0.328054 Sample Standard Deviation = 0.138965 W Statistic = 0.796129

5% Critical value of 0.818 exceeds 0.796129 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 is less than 0.796129 Data is normally distributed at 99% level of significance

Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-03 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 9.83076 Sample Standard Deviation = 4.36657 W Statistic = 0.724093

5% Critical value of 0.818 exceeds 0.724093 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 exceeds 0.724093 Evidence of non-normality at 99% level of significance

Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-03 Normality Test of Parameter Concentrations Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 0.776723 Sample Standard Deviation = 0.325539 W Statistic = 0.813257

5% Critical value of 0.818 exceeds 0.813257 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 is less than 0.813257 Data is normally distributed at 99% level of significance

Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-06 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 15.7649 Sample Standard Deviation = 7.58767 W Statistic = 0.616693

5% Critical value of 0.818 exceeds 0.616693 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 exceeds 0.616693 Evidence of non-normality at 99% level of significance

Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-06 Normality Test of Parameter Concentrations Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 0.834388 Sample Standard Deviation = 0.36549 W Statistic = 0.74454

5% Critical value of 0.818 exceeds 0.74454 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 exceeds 0.74454 Evidence of non-normality at 99% level of significance

Skewness Coefficient Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Skewness Coefficient Parameter: Fluoride Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Shapiro-Wilks Test of Normality Parameter: Fluoride Location: MW-16-01 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL $K = 7$ for 15 measurements

Sum of b values = 0.78619 Sample Standard Deviation = 0.244488 W Statistic = 0.738606

5% Critical value of 0.881 exceeds 0.738606 Evidence of non-normality at 95% level of significance

1% Critical value of 0.835 exceeds 0.738606 Evidence of non-normality at 99% level of significance Shapiro-Wilks Test of Normality Parameter: Fluoride Location: MW-16-01 Normality Test of Parameter Concentrations Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

 $K = 7$ for 15 measurements

Sum of b values = 0.551771 Sample Standard Deviation = 0.175662 W Statistic = 0.704751

5% Critical value of 0.881 exceeds 0.704751 Evidence of non-normality at 95% level of significance

1% Critical value of 0.835 exceeds 0.704751 Evidence of non-normality at 99% level of significance

Skewness Coefficient Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Skewness Coefficient Parameter: Lithium Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Shapiro-Wilks Test of Normality Parameter: Lithium Location: MW-16-05 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values $= 6.5119$ Sample Standard Deviation = 2.66927 W Statistic = 0.850222

5% Critical value of 0.818 is less than 0.850222 Data is normally distributed at 95% level of significance

1% Critical value of 0.749 is less than 0.850222 Data is normally distributed at 99% level of significance

Skewness Coefficient Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Skewness Coefficient Parameter: Radium-226/228 Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Shapiro-Wilks Test of Normality Parameter: Radium-226/228 Location: MW-16-07 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values $= 0.421788$ Sample Standard Deviation = 0.177044 W Statistic = 0.810823

5% Critical value of 0.818 exceeds 0.810823 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 is less than 0.810823 Data is normally distributed at 99% level of significance

Shapiro-Wilks Test of Normality Parameter: Radium-226/228 Location: MW-16-07 Normality Test of Parameter Concentrations Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values $= 0.546956$ Sample Standard Deviation = 0.220765 W Statistic = 0.876893

5% Critical value of 0.818 is less than 0.876893 Data is normally distributed at 95% level of significance

1% Critical value of 0.749 is less than 0.876893 Data is normally distributed at 99% level of significance

Non-Parametric Tolerance Interval Parameter: Antimony Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 87.5% Background measurements $(n) = 8$ Maximum Background Concentration = 2.1 Minimum Coverage = 68.8% Average Coverage = 88.8889%

Non-Parametric Tolerance Interval MW-16-01Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 0% Background measurements $(n) = 8$ Maximum Background Concentration = 21.5 Minimum Coverage = 68.8% Average Coverage = 88.8889%

MW-16-01

Non-Parametric Tolerance Interval Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 0% Background measurements (n) = 15 Maximum Background Concentration = 1.8 Minimum Coverage = 81.9% Average Coverage = 93.75%

Parametric Tolerance Interval Analysis MW-16-01Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 71 Background standard deviation = 6.58461 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 91.9917

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

MW-16-01

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 0.592313 Background standard deviation = 0.222588 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 1.30192

Parametric Tolerance Interval Analysis Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 7.74375 Background standard deviation = 0.826109 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 10.3774

Parametric Tolerance Interval Analysis Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 1.54 Background standard deviation = 0.0910259 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.77357

Parametric Tolerance Interval Analysis Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 95.6875 Background standard deviation = 8.88392 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 124.009

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

MW-16-02

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 2.72188 Background standard deviation = 0.388403 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 3.9601

Non-Parametric Tolerance Interval MW-16-03Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 0% Background measurements $(n) = 8$ Maximum Background Concentration = 21 Minimum Coverage = 68.8% Average Coverage = 88.8889%

MW-16-03

Non-Parametric Tolerance Interval Parameter: Chromium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 87.5% Background measurements $(n) = 8$ Maximum Background Concentration = 3.1 Minimum Coverage = 68.8% Average Coverage = 88.8889%

Parametric Tolerance Interval Analysis MW-16-03 Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 1.51333 Background standard deviation = 0.0833809 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.72729

Non-Parametric Tolerance Interval MW-16-03Parameter: Lead Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 75% Background measurements $(n) = 8$ Maximum Background Concentration = 2.5 Minimum Coverage = 68.8% Average Coverage = 88.8889%

Parametric Tolerance Interval Analysis Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 104.625 Background standard deviation = 9.30342 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 134.284

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

MW-16-03

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 2.33375 Background standard deviation = 0.212464 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 3.01109

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 10.0938 Background standard deviation = 0.833426 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 12.7507

Parametric Tolerance Interval Analysis Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 0.961 Background standard deviation = 0.064868 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.12745

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 18.4375 Background standard deviation = 1.54544 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 23.3644
Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 0.727625 Background standard deviation = 0.148982 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 1.20258

Parametric Tolerance Interval Analysis Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 10.4125 Background standard deviation = 2.23443 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 17.5359

Parametric Tolerance Interval Analysis Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 1.45 Background standard deviation = 0.0981981 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.70198

Parametric Tolerance Interval Analysis Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 41.375 Background standard deviation = 2.66927 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 49.8846

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

MW-16-05

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 1.7125 Background standard deviation = 0.319855 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 2.7322

Non-Parametric Tolerance Interval Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 0% Background measurements $(n) = 8$ Maximum Background Concentration = 34 Minimum Coverage = 68.8% Average Coverage = 88.8889%

MW-16-06

Non-Parametric Tolerance Interval Parameter: Cobalt Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 87.5% Background measurements $(n) = 8$ Maximum Background Concentration = 1.6 Minimum Coverage = 68.8% Average Coverage = 88.8889%

Parametric Tolerance Interval Analysis Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 1.55333 Background standard deviation = 0.0915475 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.78824

Non-Parametric Tolerance Interval Parameter: Lead Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 87.5% Background measurements $(n) = 8$ Maximum Background Concentration = 1.1 Minimum Coverage = 68.8% Average Coverage = 88.8889%

Parametric Tolerance Interval Analysis Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 78.875 Background standard deviation = 7.8638 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 103.945

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

MW-16-06

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = -0.366475 Background standard deviation = 0.143131 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 0.0898265

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 8.55 Background standard deviation = 0.570714 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 10.3694

Parametric Tolerance Interval Analysis Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 1.48667 Background standard deviation = 0.10601 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.75869

MW-16-07

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 34.8125 Background standard deviation = 2.59033 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 43.0705

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

MW-16-07

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = -0.353994 Background standard deviation = 0.220765 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 0.349805

Appendix O

Fate and Transport Model Inputs

Calculation Package

 $Geosyntec$

COMPUTATION COVER SHEET

TABLE OF CONTENTS

1. PURPOSE

The purpose of this calculation package is to calculate the vertical Darcy velocity of the model lithology for input in Fate and Transport numerical model at the Monroe Power Plant Fly Ash Basin (FAB). Following Darcy velocity calculation, the solution is used to calculate the time of travel from the FAB to the Uppermost Aquifer.

2. ASSUMPTIONS

- Vertical flow is the dominant influence on contaminant transport; horizontal flow is not considered since a one-dimensional model was selected.
- Vertical hydraulic conductivity calculated in the laboratory using samples \bullet collected from borings is representative of subsurface conditions.

3. DARCY VELOCITY SOLUTION

The Darcy velocity (q) through the model lithologies/layers is expressed in m/year =

$$
=K(i)=K\left(\frac{H_1-H_2}{l_1-l_2}\right)
$$

Where,

$q =$	Darcy velocity in m/year $(=\text{cm/s} * 315360) =$ 3	6.08 x 10^3 m/year
$l_2=$	Average elevation of well screen midpoints = 532.95^{T} ft	
$l_1=$	Elevation of bottom of $FAB =$	563 ft
$H_2=$	Average water level elevation from monitoring wells (data provided in Attachment 2) =	583.8 ¹ ft
H _l	Total head at the bottom of $FAB =$	609 ft
$K =$	Geomean of Sandy Lean Clay hydraulic conductivity value (data provided in Attachment 1) =	2.27×10^{-8} cm/s
Thus:		
$l_1 - l_2 =$	distance in direction of flow	
$H_1 - H_2 =$	difference in hydraulic head between the FAB water level and the upper most aquifer potentiometric surface	
$i =$	vertical gradient	
vertical hydraulic conductivity (laboratory measured) $K =$		

^{1.} Value is an average taken from all monitoring wells with the exception of the outlier MW-16-04

4. TRAVEL TIME SOLUTION

Travel time through the model lithology is expressed in years $=$

$$
T = t / \left(\frac{K * i}{n}\right)
$$

Where:

Note: Time travel is not an input to Pollute model. It has been calculated to provide time estimate for the travel of water molecule from the bottom of FAB to top of uppermost aquifer.

Attachment 1

Permeability Data Evaluation Table 0-1

Attachment 2

Table 1

Groundwater Elevation Summary – April and October 2020

Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill – RCRA CCR Monitoring Program

Monroe, Michigan

Notes:

Negative depth to water measurement indicates artesian conditions, actual measured water level is above the top of casing.

Elevations are reported in feet relative to the North American Vertical Datum of 1988.

ft BTOC - feet below top of casing

(1) Water level meaured on October 6, 2020.

POLLUTE Model Inputs

 $\hat{\textbf{r}}$

Notes:

1. Kv = Vertical Hydraulic conductivity as determined by the analysis of field and laboratory data summarized in Table O-1.

2. Analysis of vertical hydraulic conductivity includes data from long term tests updated on 8/20/2021

3. CoHD = Coefficient of Hydrodynamic Dispersion

4. Effective Porosity determined by multiplying estimated porosity from field and lab data by 0.81, based on data provided by Sara, 1994.

5. Distribution Coefficient, Kd of 0.0082 m3/kg was used for Molybdenum, for minimum thickness sensitivity analysis.

Model Thickness

Reference Material

R. Kerry Rowe, Robert M. Quigley, Richard W.I. Brachman & John R. Booker

Figure 8.10 Chloride and potassium concentration versus depth in sample for model D (modified from Rowe et al., 1988).

variation in concentration with depth in the soil at the end of each test. The consistency of results demonstrates the power of the analytical model (program POLLUTE) and provides some con-

Figure 8.11 Chloride and potassium concentration versus depth in sample for model E (modified from Rowe et al., 1988).

Diffusion and distribution coefficients

fidence in the parameters D and ρK_d for the clay and source fluids examined.

To provide an indication of parameter variation that might be expected for a given soil, a number of tests were duplicated. The diffusion coefficient, D, for chloride was deduced for each model and ranged between 0.018 and $0.02 \text{ m}^2/\text{a}$ with an average value of $0.019 \,\mathrm{m}^2/\mathrm{a}$. This small variation in D does not appear to be related to small differences in Darcy velocity, nor does it appear to be particularly related to the nature of the associated cation (see Table 8.3). Rather, the variability from 0.018 to $0.02 \,\mathrm{m}^2/\mathrm{a}$ is seen as an indication of the level of repeatability that may be achieved for this type of test.

The application of an effective stress to the soil sample adopted in these tests is not an essential part of the proposed technique for determining the parameters D and K_d . Tests performed for the particular combination of clay and permeants considered herein gave similar results both with and without the application of the effective stress. However, for some combinations of clay and permeant, shrinkage of the clay may occur in the absence of a confining stress and this can give quite misleading results (e.g., see Quigley and Fernandez, 1989). For these clays, and for GCLs (see Chapter 12), tests should be performed at an effective stress similar to that anticipated in the field.

8.3.2 Pure diffusion tests

In many cases, it is not necessary to perform an advection-diffusion test. Under these circumstances, a simple diffusion test can be performed for boundary conditions shown in Figure 8.2. In this test, the soil sample is placed in a Plexiglass cylinder by trimming the sample to a size marginally greater than the specimen and then pressing the specimen into the cylinder, using a cutting shoe attached to the cylinder, to perform the final trim. This procedure is found to work well for many clays. However, it does not work well for clays with a significant stone content because the

Table 5-9 Porosity, Residual Saturation and Effective Porosity of Common Soils

First line is the mean value Second line is + one standard deviation about the mean

Adapted from: Rawls, W.J., D.C. Brakensiek, K.E. Saxton, 1982

The ratio of effective porosity to total porosity is 0.81 for Clay, and 0.88 for Silty Clay. Use 0.81 to be conservative.

TECHNICAL REPORTS SERIES No. $\bf{364}$

Handbook of Parameter Values for the Prediction of Radionuclide Transfer in Temperate Environments

Produced in collaboration with the **International Union of Radioecologists**

INTERNATIONAL ATOMIC ENERGY AGENCY, VIENNA, 1994

 $\mathcal{O}(10^{10} \, \mathrm{Mpc})$

 $\mathcal{L}^{\text{max}}_{\text{max}}$

Appendix O

Fate and Transport Model Outputs

Version 7.13

Copyright (c) 2007. GAEA Technologies Ltd., R.K. Rowe and J.R. Booker

Monroe_Baseline

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_ExtendedRun_Kd

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

Version 7.13

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Monroe_DoubleDarcy_Kd

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.0122 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

Version 7.13

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Monroe_CoHD_High_Kd

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_CoHD_Low

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_Porosity_High

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_Porosity_Low_Kd

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

Version 7.13

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Monroe_Thick

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_Thin_Kd

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

Attachment B

Alternative Liner Demonstration

Prepared for

DTE Electric Company One Energy Plaza Detroit, Michigan 48226

ALTERNATE LINER DEMONSTRATION FLY ASH BASIN

MONROE POWER PLANT

Monroe, Michigan

Prepared by

consultants

Geosyntec Consultants of Michigan

3011 West Grand Boulevard, Suite 2300 Detroit, Michigan 48202

GLP8014

April 2023

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Geosyntec^o

consultants Geosyntec Consultants of Michigan

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1. INTRODUCTION

This report has been prepared to provide the Alternate Liner Demonstration (ALD) of Monroe Fly Ash Basin (FAB) coal combustion residuals (CCR) unit, in accordance with 40 CFR Part 257 as amended on November 12, 2020 (CCR Part B Rule). **Figure 1-1** provides the site location.

The FAB is one of two CCR units at the site. The other CCR unit is the Vertical Extension Landfill (Landfill) located within the northwest quadrant atop the FAB. DTE is planning to operate the Landfill through the end of 2040.

This report concludes that there is no reasonable probability that water from the FAB will cause a release to the groundwater that will exceed the groundwater protection standard (GWPS) at the waste boundary over the projected active life of the CCR unit.

1.1 Background

DTE Electric Company (DTE) submitted the Alternate Liner Demonstration Application for the FAB to the United States Environmental Protection Agency (USEPA) on November 30, 2020 [1] in accordance with the CCR Rule. Soon after, DTE started the field and laboratory investigation studies to meet the requirements of the CCR Rule.

One of the requirements of the CCR Rule is to conduct hydraulic conductivity testing using sitespecific permeant liquid. The CCR Rule acknowledges that these tests may last a long time such that the operator of the CCR unit may need to submit an extension request for the laboratory testing program, and submit a preliminary ALD.

DTE submitted extension requests due to "analytical limitation" under separate covers, dated September 1, 2021 [2] and September 1, 2022 [3]. The extension requests detailed the compatibility testing program results through August 20, 2022. The USEPA has not yet responded to the extension requests.

The Part B Rule does not require the submittal of a preliminary ALD (PALD) by November 30, 2021 if an extension request is submitted in accordance with $\S257.71(d)(2)(ii)(A)$. However, DTE provided a PALD [4] out of an abundance of caution and with confidence in the performance of the liner system as a "place holder" to comply with the requirement to submit a PALD by November 30, 2021.

The PALD detailed the site investigation, conceptual site model, laboratory study, and fate and transport model concluding that there is no reasonable probability that water from the FAB will cause a release to the groundwater that will exceed the GWPS at the waste boundary over the projected active life of the CCR unit. This ALD includes additional data analyzed subsequent to

the submittal of the PALD, and confirms the appropriateness of the hydraulic conductivities used in the PALD fate and transport model.

1.2 Purpose

The purpose of this report is to provide the final ALD including the approach, analysis details, and final results in accordance with the CCR Rule.

1.3 Report Organization

The remainder of this report is organized as follows:

- Section 2 provides the field and laboratory investigation details, information on site geology/hydrogeology, and conceptual site model details.
- Section 3 provides results of hydraulic conductivity testing, termination criteria details, chemistry testing of site-specific porewater, and discussion of results.
- Section 4 provides analysis approach, details, GWPS, and evaluation of results as to whether the FAB meets the ALD requirement of the CCR Rule.
- Section 5 provides a summary of the report.
- Section 6 provides certification.
- Section 7 provides references.

1.4 Terms of Reference

This report was prepared by Mike Coram C.P.G., Clinton Carlson Ph.D., P.E., Jesse Varsho P.E., and reviewed by John Seymour, P.E. of Geosyntec Consultants of Michigan, Inc. (Geosyntec).

2. CHARACTERIZATION OF SITE HYDROGEOLOGY

The CCR Rule requires the following:

§257.71(d)(ii)(A) Characterization of site hydrogeology. A characterization of the variability of site-specific soil and hydrogeology surrounding the surface impoundment that will control the rate and direction of contaminant transport from the impoundment. The owner or operator must provide all of the following as part of this line of evidence:

(1) Measurements of the hydraulic conductivity in the uppermost aquifer from all monitoring wells associated with the impoundment(s) and discussion of the methods used to obtain these measurements;

(2) Measurements of the variability in subsurface soil characteristics collected from around the perimeter of the CCR surface impoundment to identify regions of substantially higher conductivity;

(3) Documentation that all sampling methods used are in line with recognized and generally accepted practices that can provide data at a spatial resolution necessary to adequately characterize the variability of subsurface conditions that will control contaminant transport;

(4) Explanation of how the specific number and location of samples collected are sufficient to capture subsurface variability if:

(i) Samples are advanced to a depth less than the top of the groundwater table or 20 feet beneath the bottom of the nearest water body, whichever is greater, and/or

(ii) Samples are spaced further apart than 200 feet around the impoundment perimeter;

(5) A narrative description of site geological history; and

(6) Conceptual site models with cross-sectional depictions of the site environmental sequence stratigraphy that include, at a minimum:

(i) The relative location of the impoundment with depth of ponded water noted;

(ii) Monitoring wells with screening depth noted;

(iii) Depiction of the location of other samples used in the development of the model;

(iv) The upper and lower limits of the uppermost aquifer across the site;

(v) The upper and lower limits of the depth to groundwater measured from monitoring wells if the uppermost aquifer is confined; and

(vi) Both the location and geometry of any nearby points of groundwater discharge or recharge (e.g., surface waterbodies) with potential to influence groundwater depth and flow measured around the unit.

2.1 Introduction

This section provides information on site geology and hydrogeology, data used in site characterization, a summary of ALD-specific field and laboratory study, and a conceptual site model built using the Environmental Visualization System (EVS).

2.2 Site Geology

The geology of Monroe County consists of primarily unconsolidated (soil) alluvium and glacial till deposits overlying bedrock. The unconsolidated material consists of shallow/surficial alluvium deposits (sand and gravel) on top of clay-rich glacial drift with some sporadic glaciofluvial deposits that range from not present to more than 150-feet (ft) thick, with an average thickness of about 50 ft [1].

In the area of the FAB, clay-rich glacial drift directly overlies the bedrock and varies in thickness from 14- to 34-ft thick. There does not appear to be glaciolacustrine or glaciofluvial deposits as there are few sand and gravel lenses. It appears the drift was deposited directly from glacial events as there is a relatively consistent clay-rich glacial drift with minimal sands and gravels usually associated with a meltwater discharge. Bedrock in Monroe County is predominantly Devonian and Silurian-aged carbonates and includes the Antrim Shale, Traverse Group, Dundee Formation (limestone and some dolostone), Detroit River Group, Sylvania Sandstone, Bass Islands Group, and Salina Group. Monroe County's eastern boundary is Lake Erie, and in general, regional groundwater flow is to the east towards Lake Erie [1]. Much of the carbonate bedrock aquifer in Monroe County is confined and naturally artesian. Saturated bedrock of the Bass Islands Group is generally encountered from 37 to 53.5 ft below ground surface (ft-bgs). Groundwater flow in the carbonate bedrock aquifer in Monroe County is primarily through secondary porosity consisting of fractures often evident along bedding-plane partings [1].

2.2.1 Fly Ash Basin Site-Specific Geology

The FAB is located about one mile southwest of the Monroe Power Plant (MPP) in Monroe, Michigan, and is bounded on the east by Lake Erie and the MPP discharge canal, on the west by Interstate Highway 75 (I-75), on the south by an agricultural field, and on the north by residential

property and Plum Creek. The FAB is encapsulated by an embankment that is up to 46 ft in height. The perimeter of the embankment crest defines the outer limits of the watershed, which is the plan area of rainfall. There is no outer watershed area that flows directly into the FAB.

During the ALD investigation in December 2020, 95 cone penetration tests (CPTs) and 9 soil borings were drilled along the top of the embankment to augment existing data. Based on the data from Geosyntec's 2020 investigation, the geology was relatively consistent with previous geologic interpretations that the underlying clay-rich soil had consistently low hydraulic conductivities. Although the geology was consistent, the clay-rich soil descriptions are redefined below:

- The embankment was created with the upper 10 ft of clay-rich native soils and compacted to act as a perimeter dike for the FAB. The embankment material is described as a compacted lean clay.
- Directly underlying the embankment, the native soils consist of up to approximately 15ft thick lean clay. Under the FAB (starting at approximate elevation 563 $ft¹$ $ft¹$ $ft¹$) the geology consists of a 14- to 34-ft thick clay-rich soil identified as sandy lean clay. The sandy lean clay descriptor is consistent with ASTM D2487 Standard Practice for Classification of Soils for Engineering Purposes (Unified Soil Classification System) [5] and differs from previous soil descriptions.
- There is a transitional unit that also differs from previous soil descriptions and is identified as weathered bedrock and/or a mix of clay, sand and gravel. This unit is approximately 5- to 10-ft thick and directly underlies the sandy lean clay and sits atop the bedrock.

The transitional unit is saturated and considered a part of the underlying fractured bedrock. For the purposes of this report, the transitional, weathered unit is considered the "uppermost aquifer unit" and is further discussed in Section 2.3.

2.3 Uppermost Aquifer Field Testing and Hydrogeology

The uppermost aquifer unit exhibits artesian conditions. In 2016, TRC installed seven bedrock monitoring wells to the north, east, south and west of the FAB. All monitoring wells exhibit artesian conditions except MW-16-01. Monitoring well MW-16-01 is located within several hundred feet of several off-site domestic residential wells located to the north along Dunbar Road adjacent to Plum Creek that likely lower the hydraulic head in the area of MW-16-01 [1]. Wells located hydraulically upgradient of the FAB include MW-16-03, MW-16-04 and MW-16-05 on

¹ Elevations are referenced to National Geodetic Vertical Datum of 1929.

the southwestern and southern part of the FAB. These wells exhibit artesian conditions, in which potentiometric elevations are significantly above the ground surface (generally 10 to 15 ft above ground surface). Downgradient monitoring wells MW-16-01, MW-16-06 and MW 16-07 range from slightly artesian to not artesian (MW-16-01).

The general flow lines within the uppermost aquifer at the site are to the northeast towards Plum Creek. The average hydraulic gradient to the northeast ranges from 0.002 to 0.0025 foot/foot along the eastern part of the FAB to 0.004 to 0.005 foot/foot in the center and northwestern part of the FAB, with an overall mean of 0.004 foot/foot.

In 2016, a hydraulic conductivity of approximately 1.5E-3 centimeters per second (cm/s) was measured at monitoring well MW-16-01 using a single well hydraulic conductivity test. In 2021, TRC conducted slug tests at monitoring wells MW-16-02 through MW-16-07 using a modified single well hydraulic conductivity test. Measured hydraulic conductivities ranged from 2.6E-3 cm/s to 3.5E-2 cm/s. Test results are provided in **Appendix A**. The monitoring well construction details are presented in **Appendix B.**

2.4 Summary of Data Used for Site Characterization

Data from many investigations were used to characterize the subsurface stratigraphy and soil characteristics for the site. Historical investigations included the 1970s, 1990s, and 2016, which are included in the initial ALD Application [1]. Data from Geosyntec's 2020 ALD Investigation were used to supplement the previous data sets. In total, these investigations included 57 borings, 95 CPTs, and seven monitoring wells. **Figure 2-1** provides investigation locations.

Boring logs from the 1970s, 1990s, 2016, and 2020 field investigations are provided in **Appendices C** through **F**, respectively. These investigations were conducted within the FAB (prior to excavation in the 1970s), outside of the FAB embankment, and through the embankment (conducted by Geosyntec in 2020 as described in Section 2.5).

Field testing included pocket penetrometer tests on fine-grained soils, slug tests for the monitoring wells screened in the uppermost aquifer, and pore pressure dissipation (PPD) tests at CPT locations. Lab testing included grain size distributions, Atterberg limits, water content, dry and/or total unit weight, specific gravity, and hydraulic conductivity testing. Type of tests, standards and number of tests are summarized in **Table 2-1**. Laboratory test results are provided in **Appendices G** through **J** for the 1970s, 1990s, 2016, and 2020 laboratory studies, respectively.

It is Geosyntec's opinion that the combined data used in building the site model are sufficient to capture the variability that may exist in soil conditions.

2.5 ALD-Specific Site Investigation Details

The scope of work for the ALD-Specific Site Investigation (SI) was completed in December 2020 and included drilling and sampling and advancing a CPT probe through the embankment and native soils. The purpose of the fieldwork was to obtain nominally undisturbed samples for hydraulic conductivity testing and to augment the existing data set to characterize the alternate liner materials in accordance with the CCR Rule. Investigations were conducted at 200-ft intervals at the top of the embankment from elevation 615 ft down to 75 ft-bgs to an approximate elevation of 540 ft. The nearest surface water body is Plum Creek, to which groundwater flows, located north of the FAB. The investigation extends down to 20 ft below the bottom of Plum Creek, which is at an approximate elevation of 562 ft.

The following sections provide a summary of the fieldwork completed during the SI.

2.5.1 Cone Penetration Tests

Ninety-five CPTs were completed atop the embankment in 200 ft intervals to characterize the FAB embankment and native soils. The CPT locations are provided in **Figure 2-1**. CPTs were advanced from the ground surface to refusal or down to approximately 75 ft-bgs. PPD tests were conducted to estimate in-situ hydraulic conductivity at select depths; at a minimum, these tests were conducted at the elevation near where undisturbed samples were collected for laboratory hydraulic conductivity testing.

In total, 70 PPD tests were completed at CPTs advanced on top of the embankment; however, equilibrium pore pressure was not achieved in many of the PPD tests due to the long wait-time associated with the fine-grained low hydraulic conductivity soils, so only six PPD tests were used for calculating hydraulic conductivity. The tests that did not achieve pore pressure equilibrium would likely have hydraulic conductivities less than the values observed for the PPD tests that converged. Hydraulic conductivity values were estimated to range between 1.66E-7 cm/s and 3.29E-8 cm/s. Results are summarized in **Table 2-2**.

CPT logs are provided in **Appendix K1**, and PPD tests are provided in **Appendix K2**.

2.5.2 Sonic Drilling

In December 2020, nine soil borings were advanced at the site to evaluate the subsurface geology, collect undisturbed samples for hydraulic conductivity testing, and collect additional soil samples for characterization of native soils and the embankment. Soil samples were collected continuously in 2 to 10-ft sections from the ground surface to the termination of the soil boring. Geosyntec staff were present to log each boring and describe the soil samples in accordance with the Unified Soil Classification System (USCS).

Shelby tubes were collected from the FAB embankment soils, and native soils at approximately 20-ft intervals from each of the sonic borings in accordance with ASTM D1587 [6]. For stiff soil samples where Shelby tube sampling was not feasible, samples were collected with a Pitcher barrel sampler in accordance with ASTM D6519 [7]. The soil borings were advanced to depths of approximately 75 ft-bgs to characterize the embankment and native soils. Sonic drilling locations are provided in **Figure 2-1.** Boring logs are provided in **Appendix F**. Soil stratigraphy is discussed in Section 2.6.

2.5.3 Laboratory Testing

A suite of index testing and hydraulic conductivity testing was conducted on select soil samples. One hundred thirty-one soil samples were collected from nine borings from depths between 5 ftbgs and 75 ft-bgs for hydraulic conductivity testing to capture stiff to very stiff soils. Details of hydraulic conductivity testing are provided in Section 3.

Index testing included:

- 131 Moisture Content tests (ASTM D2216)
- 8 Specific Gravity tests (ASTM D854)
- 75 Grain Size Mechanical Sieve tests (ASTM D6913)
- 8 Grain Size Hydrometer tests (ASTM D7928)
- 75 Atterberg Limits tests (ASTM D4318)

Note that these tests are included in **Table 2-1**. Test results are provided in **Appendix J**.

2.6 Conceptual Site Model

A comprehensive conceptual site model was developed from the data collected during the field investigations and an EVS model was developed for the site. Based on the EVS model, the overall conceptual site model of the FAB lithology is relatively consistent with low hydraulic conductivity clay-rich glacial deposits with non-interconnected sand seams. Within the FAB footprint, the uppermost aquifer includes the bedrock and overlying transition zone. The uppermost aquifer is assumed to extend from the top of the transitional unit to the base of the bedrock. The vertical extent of fractures within the fractured bedrock aquifer is unknown, so it is assumed the entire bedrock beneath the FAB is fractured.

Cross-sections (**Figures 2-2** through **2-7**) were created from the EVS model and analyzed to determine the various changes in lithology across the FAB. Upon review of the transects, the lithology beneath the FAB consists of (from the embankment downward) (1) lean clay, (2) sandy

lean clay, (3) transitional unit, and (4) bedrock. These units are consistent with historical reports and TRC's November 2020, Initial Application for Alternate Liner Demonstration [1]; however, the naming of the units has been updated. Previous soil descriptions identify the main clay unit underlying the FAB as a "silty clay". However, geotechnical laboratory index test results (i.e., Atterberg limits and grain size distribution tests) indicate the soil is classified as a "sandy lean clay" as shown in **Figure 2-8**.

A second discrepancy is the identification of the transitional unit that was included in the descriptors. There appears to be some variation in the description of the unit directly atop the bedrock. The transitional unit was encountered below the sandy lean clay and atop the bedrock and mainly consists of weathered bedrock and clay mixed with gravel, sand and silt. The uppermost aquifer was identified as the top of the transitional unit and includes the transitional unit and bedrock. The lithology directly underlying the FAB consist of the following:

- (1) Lean clay This unit represents the compacted lean clay (i.e., embankment) and native lean clay soils immediately below the embankment. This unit consists of soils that are generally classified as lean clay with sand (i.e., percent retained above sieve #200 is less than approximately 30%). In some cases, it is classified as sandy lean clay (i.e., percent retained above sieve #200 is greater than approximately 30%). Hereafter, the embankment, which is approximately 40-ft thick to an approximate elevation of 573 ft, is referred to as "lean clay". This unit consists of mainly compacted stiff clay and minimal sand seams. The embankment soils were sourced from the native lean clays.
- (2) Sandy lean clay This unit is encountered directly beneath the FAB and ranges from 14- to 34-ft thick with an average thickness of 21 ft. This unit has an increasing thickness from south to north and consists of low plasticity clay. There were minimal observed sand lenses and they do not appear to be interconnected within the sandy lean clay unit. Based on the PPD test data, the hydraulic conductivity values ranged between 1.66E-7 cm/s and 3.29E-8 cm/s for native soils. These values are consistent with TRC's 2018 Natural Clay Liner Equivalency Evaluation Report [1] and are adequate hydraulic conductivity values to be considered a low hydraulic conductivity unit.
- (3) Uppermost Aquifer Unit The weathered bedrock and mixed clays with sand, silt and gravel is referred to as the transition unit and it sits atop the bedrock. The uppermost aquifer unit begins at the top of the transition unit and extends into the underlying fractured bedrock. The uppermost aquifer exhibits artesian conditions. At its thinnest section, the FAB has approximately 14 ft of clay-rich soil separating the bottom of the FAB from the uppermost aquifer. It is assumed the uppermost aquifer unit extends from the top of the transition unit to the base of the bedrock, which can extend to approximately 300 ft-bgs [6].

3. POTENTIAL FOR INFILTRATION

The CCR Rule requires:

§257.71(d)(ii)(B) Potential for infiltration. A characterization of the potential for infiltration through any soil-based liner components and/or naturally occurring soil that control release and transport of leachate. All samples collected in the field for measurement of saturated hydraulic conductivity must be sent to a certified laboratory for analysis under controlled conditions and analyzed using recognized and generally accepted methodology. Facilities must document how the selected method is designed to simulate on-site conditions. The owner or operator must also provide documentation of the following as part of this line of evidence:

(1) The location, number, depth, and spacing of samples relied upon is supported by the data collected in paragraph (d)(1)(ii)(A) of this section and is sufficient to capture the variability of saturated hydraulic conductivity for the soil-based liner components and/or naturally occurring soil;

(2) The liquid used to pre-hydrate the samples and measure long-term hydraulic conductivity reflects the pH and major ion composition of the CCR surface impoundment porewater;

(3) That samples intended to represent the hydraulic conductivity of naturally occurring soils (i.e., not mechanically compacted) are handled in a manner that will ensure the macrostructure of the soil is not disturbed during collection, transport, or analysis; and

(4) Any test for hydraulic conductivity relied upon includes, in addition to other relevant termination criteria specified by the method, criteria that equilibrium has been achieved between the inflow and outflow, within acceptable tolerance limits, for both electrical conductivity and pH.

3.1 Site-Specific Soil and Porewater Details

3.1.1 Soil Samples for Hydraulic Conductivity Testing

Sixteen site-specific soil samples were collected for hydraulic conductivity testing. Considering the extent of existing field investigation data, including CPTs with PPDs and earlier borings, Geosyntec believes that the collected samples are sufficient to capture the variability of hydraulic conductivity in the natural soils and the embankment present at the FAB.

3.1.2 Site-Specific Porewater Testing and Results

Site-specific CCR porewater samples were collected from five open standpipe wells screened in CCR for geochemical analyses to assess the representative composition of an "aggressive" solution for use in the hydraulic conductivity compatibility testing. Samples were filtered through a 0.45 micron filter to evaluate dissolved concentrations. Site-specific porewater samples were tested for CCR Rule Appendix III and Appendix IV parameters as well as additional major cations (sodium, magnesium, potassium), anions (total alkalinity), iron, and manganese.

All porewater samples were found to be basic, with pH values ranging from 9.73 to 11.8 SU. Total dissolved solids (TDS) concentrations ranged from 390 to 1600 milligrams per liter (mg/L), although four of the five samples were found to have TDS concentrations less than 1000 mg/L, which is defined by the United States Geological Survey (USGS) as "freshwater". Major ion compositions of these samples are illustrated on the Piper diagram in **Figure 3-1**. Three of the five samples suggest that the anion composition of the basin water is predominantly alkalinity, with variable contributions of sulfate. The cation composition is highly variable, with a range of calcium and monovalent cation (potassium and sodium) proportions and very little magnesium.

The analytical results are provided in **Appendix L** and tabulated in **Table 3-1**. Results were used to calculate total ionic strength for each sample. Total ionic strength is a measure of the combined ion concentrations in a solution and can represent the salinity of a sample. Total ionic strength was calculated for each sample using geochemical modeling software Geochemist's Workbench (GWB) v12.0.4. The GWB thermodynamic dataset 'thermo.com.V8.R6_.tdat' was used for the calculations to incorporate all tested parameters. Analytical results for each parameter were input into GWB in units of mg/L and the ionic strength of each sample was calculated in units of molality (m).

All samples contained similar ionic strength values (0.0124 m to 0.0311 m) with the exception of PZ-2, which contained an ionic strength of 0.0723 m. The PZ-2 sample is considered to be the more aggressive solution and was used for compatibility testing as described in Section 3.2.

3.2 Hydraulic Conductivity Testing Procedure

Eight soil samples were tested for hydraulic conductivity, *k*, using deionized water in accordance with ASTM D5084 [9] to establish a baseline hydraulic conductivity. The other eight samples were selected for compatibility testing in accordance with ASTM D7100 [10] using site-specific porewater. The use of ASTM D7100 is discussed in the preamble of the CCR Rule and deemed appropriate by USEPA.

ASTM D7100 termination criteria require the following conditions:

• The ratio of outflow to inflow is between 0.75 and 1.25;

- The hydraulic conductivity is steady, defined as four or more consecutive hydraulic conductivity measurements falling within ± 25 % of the mean value if the mean hydraulic conductivity is greater than or equal to 1.0E-8 cm/s or within ± 50 % if the mean hydraulic conductivity is less than 1.0E-8 cm/s, and a plot or tabulation of the hydraulic conductivity versus time shows no significant upward or downward trend;
- At least two pore volumes (PV) of flow have passed through the sample; and
- pH and electrical conductivity of effluent are within 10% of that for the influent with no significant increasing or decreasing trends.

3.3 Hydraulic Conductivity Test Results and Assessment

The final measured hydraulic conductivities based on ASTM D5084 for the samples range from 2.7E-9 to 8.1E-8 cm/s. **Table 3-2** presents a summary of the measured hydraulic conductivities for the samples and more details are provided in **Appendix J**.

Results for the hydraulic conductivity compatibility tests are provided in **Appendix M** with measurements through December 23, 2022 and summarized in **Table 3-3**. The table provides sample ID, the start date for testing, amount of PV passed through the sample, and hydraulic conductivity measurements.

A set of figures is included to present:

- PV passed with time;
- hydraulic conductivity with time;
- hydraulic conductivity versus PV passed;
- pH of inflow and outflow with time; and
- electrical conductivity (EC) of inflow and outflow with time.

These plots are provided in **Figures 3-2** through **3-41**.

The final measured hydraulic conductivities of samples range between 3.3E-9 and 1.0E-8 cm/s. The amount of PV that passed through the samples range from 1.5 to 7.8. All but sample B4-ST-2 (40-42') have passed more than 2 PV to satisfy the termination criterion. The hydraulic conductivities generally remained steady or slightly decreased with time and PV passed.

pH measurements are provided in **Table 3-4.** The average pH of inflow ranges from 12.5 to 12.6, and the average pH of outflow ranges from 8.5 to 8.7. The average pH of outflow are not within 10% of the average pH of inflow. The pH measurements of the inflow and outflow have remained steady over the two years of testing.

EC measurements are provided in **Table 3-5.** The average EC of inflow ranges from 5,639 to 5,905, and the average EC of outflow ranges from 1,080 to 1,833. The EC measurements of outflow and inflow are not within 10% for all the samples.

Table 3-6 summarizes if the samples have reached the termination criteria for PV, hydraulic conductivity, pH, and EC in December 2022. As summarized in the table, all but one sample (B4- ST-2) have reached the termination criteria for PV passed and hydraulic conductivity. None of the samples have reached the termination criteria for pH and EC.

Overall, the average hydraulic conductivity measurements for the samples (2.9E-9 to 1.1E-8 cm/s) have remained steady or slightly decreased from the average measurements (3.5E-9 to 1.4E-8 cm/s) presented in the PALD [4]. The average hydraulic conductivity measured for samples B2- ST-1 (5.4E-9 to 5.5E-9 cm/s) and B6-ST-3 (9.8E-9 to 1.0E-8) slightly increased from the PALD [4].

The results do not present inflow versus outflow data. The project team decided to keep the inflow constant to provide a more stable hydraulic gradient across the sample, more accurate estimation of hydraulic conductivity, faster testing, and more control in the testing procedure. It is Geosyntec's opinion that the inflow/outflow criterion was satisfied during the two years of testing because of the consistently low hydraulic conducitivity results and constant hydraulic conductivity measurements (not significantly increasing or decreasing).

4. FATE AND TRANSPORT MODEL ANALYSES

The CCR Rule requires:

§257.71(d)(ii) (C) Mathematical model to estimate the potential for releases. Owners or operators must incorporate the data collected for paragraphs $(d)(1)(ii)(A)$ *and* $(d)(1)(ii)(B)$ *of this section into a mathematical model to calculate the potential groundwater concentrations that may result in downgradient wells as a result of the impoundment. Facilities must also, where available, incorporate the national-scale data on constituent concentrations and behavior provided by the existing risk record. Application of the model must account for the full range of site current and potential future conditions at and around the site to ensure that high-end groundwater concentrations have been effectively characterized. All the data and assumptions incorporated into the model must be documented and justified.*

(1) The models relied upon in this paragraph (d)(1)(ii)(C) must be well- established and validated, with documentation that can be made available for public review.

(2) The owner or operator must use the models to demonstrate that, for each constituent in appendix IV of this part, there is no reasonable probability that the peak groundwater concentration that may result from releases to groundwater from the CCR surface impoundment throughout its active life will exceed the groundwater protection standard at the waste boundary.

(3) The demonstration must include the peak groundwater concentrations modeled for all constituents in appendix IV of this part attributed both to the impoundment in isolation and in addition to background.

4.1 Introduction

A fate and transport model analysis was performed to evaluate whether the peak groundwater concentrations that may result from releases to the groundwater from the FAB exceeds the GWPS at the waste boundary throughout its active life.

The model considers flow of CCR porewater Constituents of Concern (COC) migrating through the sandy lean clay down to the top of the uppermost aquifer (top of transition zone). The model does not consider additional migration of COCs horizontally to the waste boundary. If considered, the horizontal groundwater flux would reduce the concentrations of the COCs; thus, the model presents a conservative assessment.

According to §257.71(2)(ii)(C)(*3*), the owner must submit "…*a final demonstration that updates only the finalized hydraulic conductivity data to confirm that the model results in the preliminary demonstration are accurate.*" The hydraulic conductivity used in the calculation of the Darcy

velocity for the baseline fate and transport model corresponds to the geometric mean of all available data. For the PALD [4], a hydraulic conductivity of 2.27E-8 cm/s was used for the baseline model. The recalculated geometric mean hydraulic conductivity based on the updated laboratory test results presented in Section 3.3 is approximately 2.24E-8 cm/s, or a decrease of approximately 1%. Furthermore, a sensitivity analysis was performed as part of the fate and transport analyses in the PALD [4] that captured this change in hydraulic conductivity data within the range of hydraulic conductivities evaluated. Therefore, the model results for the fate and transport analysis presented in the PALD [4] are considered accurate and not updated for this ALD. The following sections summarize the fate and transport analyses from the PALD for convenience.

As discussed in Section 4.6.1 the results of the model predict COC concentrations that are very low such that there is no reasonable probability that water from the FAB will cause releases to the groundwater that will exceed the GWPS at the waste boundary over the projected active life of the FAB.

4.2 Groundwater Protection Standards

Groundwater samples from TRC's 2016 and 2017 sampling events were tested for Appendix IV COCs and represent eight rounds of background groundwater data. The data were used to calculate site-specific background levels (background) for Appendix IV COCs. **Appendix N** provides the memorandum describing the statistical calculations.

To develop GWPS for the ALD assessment, the federal Maximum Contaminant Level (MCL), Regional Screening Levels, and background (whichever is higher) were evaluated and the highest value was selected as the GWPS in accordance with the CCR Rule. Where MCL are not available Regional Screening Levels were used. GWPS are provided in **Table 4-1.**

4.3 Consideration of Background Groundwater Concentrations

The site-specific background has been considered and is a factor when determining if GWPS have been exceeded. At the FAB, naturally occurring background concentrations are generally much lower than the GWPS. The predicted groundwater concentrations and the peak background concentrations are further discussed in Section 4.6.1.

4.4 CCR Porewater Quality Results

CCR porewater quality samples from the FAB were collected in December of 2020 and January of 2021. Samples were analyzed for Appendix IV parameters by ALS Environmental in Holland, MI. Analytical results were compared for each parameter and the highest CCR porewater concentration was used as the established concentration of the constituent (C_o) when calculating the predicted groundwater concentrations (PGC_t), as discussed further below. The CCR porewater quality data are summarized in **Table 4-2**.

In addition to the site-specific CCR porewater concentrations, 90th percentile concentrations from the 2014 EPA study [11] were considered in the analysis. This data is summarized in **Table 4-2**.

4.5 Fate and Transport Model

4.5.1 Analysis Model

A one-dimensional fate and transport model was performed to further understand the potential for contaminant transport from the FAB to the uppermost aquifer. The model was developed with a contaminant transport process through the sandy lean clay layer under the FAB. Contaminant transport processes are discussed in Section 4.5.2.1.

The modeling program POLLUTE [12] was selected for the one-dimensional fate and transport evaluation. POLLUTE uses the input parameters to perform calculations for individual transport processes, and then uses the semi-analytical solution for the various transportation process (see Section 4.5.2) to yield predicted concentrations at the various specified times and distances.

Model setup and inputs are discussed in detail in the following sections and are summarized by layer in **Figure 4-1**.

4.5.2 Proposed Mathematical and Associated Computer Model

4.5.2.1 **Mathematical Model**

The potential transport mechanisms that may occur at the FAB for the various modeled layer include advection, mechanical dispersion and diffusion. For porous media, these transport mechanisms can be represented by the following one-dimensional flow equation [13]:

Equation No. 1:
$$
n\frac{\delta c}{\delta t} = nD\frac{\delta^2 c}{\delta z^2} - V_\alpha \frac{\delta c}{\delta z} - \rho K_d \frac{\delta c}{\delta t} - n\lambda c
$$

Where:

 $c =$ concentration at any point

 $D =$ coefficient of hydrodynamic dispersion in the vertical direction

 $n =$ porosity of the geologic layer

 V_{α} = Darcy velocity in the vertical direction

 K_d = distribution coefficient

 $\rho =$ dry density of soil

 λ = decay constant of the contaminant species

 $t = time$

POLLUTE assumes that the transport phenomena are governed by Equation No. 1.

4.5.2.2 **Predicted Groundwater Concentrations**

This model uses an initial concentration value of one (1), which represents a unit concentration of any constituent in the CCR porewater. The results from the model can thus be used as a prediction factor for estimating the future concentration of any COC in groundwater. Multiplying the output prediction factor by the initial CCR porewater concentration returns the predicted groundwater concentration at the end of the model run. The following equation (Equation No. 2) illustrates this concept:

Equation No. 2:
$$
PGC_t = PF_t * C_o
$$

Where:

 $PGC_t = predicted groundwater concentration after t years.$

 PF_t = prediction factored after t years, which is the output of the model.

 C_0 = established CCR porewater concentration of the COC.

4.5.3 Fate and Transport Model Inputs

4.5.3.1 **Initial CCR Porewater or Source Concentration**

The initial CCR porewater concentration input value used was unity (1). This value is unitless because it represents unit CCR porewater concentration of any given constituent. Therefore, the model results represent a fraction of the initial CCR porewater concentration for any constituent.

4.5.3.2 **Number of Layers and Layer Thickness**

One layer was modeled at the site: the sandy lean clay layer. At the FAB, the sandy lean clay layer has an average thickness of 20.7 ft. The average thickness of the layer was derived from an isopach map generated by subtracting the surface representing the bottom of the layer from the surface representing the top of the layer and averaging the difference over the footprint of the FAB. Model documentation for the average thickness can be found in **Appendix O**.

POLLUTE also allows layers to be subdivided into sublayers, which allows the predicted concentration distribution within a layer to be calculated. The sandy lean clay layer was divided into 10 sublayers at the FAB.

4.5.3.3 **Modeling Period**

The model was run for an operating period of 67 years. This modeling period captures the amount of time elapsed from 1975, when operations started at the FAB, to 2041, when the Landfill within the FAB is planned to be closed.

4.5.3.4 **Talbot Parameters**

POLLUTE uses a Laplace transform to find the solution to the advection-dispersion equation. The numerical inversion of the Laplace transform depends on the Talbot parameters. The model provides default values for the parameters, or they can be selected by the user. The default Talbot parameters were used in this demonstration [14].

4.5.3.5 **Boundary Conditions**

POLLUTE allows the user to select between multiple upper and lower boundary conditions. The top boundary condition typically represents the bottom of the CCR unit as a potential source. The top boundary can be specified as either zero flux, constant concentration, or finite mass. A constant concentration was assumed as it provides conservative model results because it assumes that the CCR porewater quality will remain constant at the maximum measured values over time.

The lower boundary can be specified as either zero flux, constant concentration, fixed outflow, or infinite thickness. For this model, an infinite thickness lower boundary was used. Therefore, the model output is a prediction factor of contaminant concentration in groundwater at the interface between the sandy lean clay layer and the underlying uppermost aquifer (the transition zone overlying the limestone bedrock).

4.5.3.6 **Darcy Vertical Velocity**

POLLUTE requires a Darcy velocity to be input for the model. The Darcy velocity was calculated for the FAB using a vertical gradient and the vertical hydraulic conductivity of the sandy lean clay layer. For the FAB, the vertical gradient was calculated using hydrogeologic data from the uppermost aquifer and the elevation of the typical operation water level within the FAB. These parameters were chosen to produce a conservative value for the Darcy velocity. A Darcy velocity value of 6.08E-3 m/year was calculated for the FAB as provided in **Appendix O**. The hydraulic conductivity value used for the calculation of Darcy velocity is the average (geometric mean) of historical and current lab testing program for the vertical hydraulic conductivity data of sandy lean clay.

4.5.3.7 **Hydrodynamic Dispersion Coefficient**

The vertical coefficient of hydrodynamic dispersion is a required input for each layer within the POLLUTE model. The hydrodynamic dispersion coefficient is calculated using Equation No. 3:

Equation No. 3: $D = D^* + av$

Where:

 $D =$ the hydrodynamic dispersion coefficient (m²/year);

 D^* = the effective diffusion coefficient (m²/year).

a $=$ the dispersivity (m);

 $v =$ the groundwater seepage velocity (m/year).

For this demonstration, a coefficient of hydrodynamic dispersion value (D) of 0.19 m^2 /year was input into the model. This value was based on the effective diffusion coefficient (D*) for chloride 0.19 m²/yr, as calculated by Rowe et al. [15]. The coefficient of chloride was chosen as it is considered to have a high capacity for diffusion compared to other constituents of interest. Therefore, it is a conservative constituent to model among the COCs.

The second part of Equation 3, the product of dispersivity and groundwater seepage velocity, is related to dispersion. Rowe et al. [15] discusses when the seepage velocity (6.08E-3 m/year) is low (i.e., clay soils), diffusion will control the hydrodynamic dispersion (D) and dispersion is negligible.

4.5.3.8 **Effective Porosity and Density Input**

The average porosity of each model layer was estimated using laboratory data as discussed in Section 2. An average of 24 percent porosity was estimated for the modeled sandy lean clay layer.

Based on empirical data provided by Sara [16], the laboratory porosity data was converted to effective porosities. An effective porosity value of 19 percent was used for the modeled sandy lean clay layer.

Density values from laboratory testing were also used to determine a suitable model input. The average density of 1,919 kg/m³ (119.8 pcf) was estimated from the available data. This value was used in the POLLUTE model.

4.5.3.9 **Adsorption Coefficient and Degradation**

Adsorption and degradation of constituents can play a significant role in the impedance of contaminant migration in the subsurface. Within POLLUTE, the adsorption coefficient simulates the impedance of constituents or sorption of contaminants in the modeled layers, while degradation simulates the breakdown of contaminants over time. Adsorption and degradation are assumed to be zero for the baseline model, which is conservative. Adsorption for molybdenum was considered for the sensitivity analysis including the minimum vertical flow path, extended time, increased Darcy velocity, the minimum effective porosity, and the high coefficient of hydrodynamic dispersion. For these sensitivity analyses, an adsorption coefficient of 0.0082 m3/kg was used [17]. More on sensitivity analyses are provided in Section 4.6.2.

4.6 Fate and Transport Analysis Results and Evaluation

4.6.1 Fate and Transport Baseline Model Results

The modeling was performed to evaluate predicted groundwater quality based on the hydrogeology of the site. The baseline model calculated a PF_t of 6.97E-3. With both the C_0 and PF_t established, the PGC $_t$ (i.e., predicted concentration) was calculated and compared to the established GWPS for the FAB. As provided in **Table 4-3**, the predicted groundwater quality results, both for site-specific CCR porewater and the 90th percentile concentrations from the 2014 EPA study [11], are below the GWPS levels. In addition, the predicted concentrations were added to the highest concentrations that were measured in the 2016-2017 groundwater sampling events and compared to the GWPS. The combined results from predicted concentrations and the highest measured concentrations are below the GWPS (see **Table 4-3**). Therefore, no impacts to groundwater above GWPS are predicted over the duration of the active life of the FAB.

The driving mechanism for the transport is chemical diffusion because the advective flow would take more than 130 years for a water molecule to travel from the bottom of the FAB to the uppermost aquifer. **Appendix O** provides calculations for the time of travel.

The baseline model outputs for the FAB are included in **Appendix P**.

4.6.2 Sensitivity Analysis

Many of the model inputs are specific to the site. Given the potential for sampling bias, uncertainty, and natural variation, a sensitivity analysis was conducted to evaluate the impact on the variation of the model inputs. The analysis focused on changes to the model output, or PF_t, given a variation to a single model input as discussed in the following sections. A summary of the sensitivity analyses model input values is provided in **Table 4-4**.

The resulting PFt, from each sensitivity analysis was compared to a threshold prediction value, $PF_{threshold}$. The $PF_{threshold}$ value represents the PF_t at which impacts to groundwater are predicted for Appendix IV COCs at the top of the uppermost aquifer under the FAB $(1.06E-2)$. PFthreshold is calculated using the Equation No. 4:

Where:

4.6.2.1 **Darcy Velocity**

A sensitivity analysis was completed to evaluate the impact of Darcy velocity. A Darcy velocity of 1.22E-2 m/year was selected as the value to use for this analysis. This value is double the baseline value calculated during this demonstration and thus serves as a suitable value for input to the sensitivity analysis.

4.6.2.2 **Coefficient of Hydrodynamic Dispersion**

Model sensitivity to the coefficient of hydrodynamic dispersion was evaluated by increasing and decreasing the input value by 25%. The initial input value was derived from laboratory testing [15], and thus a 25% increase and decrease are considered a satisfactory variation for the purposes of a sensitivity analysis.

4.6.2.3 **Porosity and Effective Porosity**

Model sensitivity to the porosity and effective porosity was evaluated by increasing and decreasing the input value by the minimum and maximum range of values calculated from the laboratory results, which are 14 percent and 31 percent, respectively.

4.6.2.4 **Layer Thickness**

The isopach map was used to calculate the maximum and minimum thickness for the sandy lean clay layer (see **Appendix O**). Using the minimum and maximum thickness values as inputs, two additional models were run for the FAB to evaluate model sensitivities to layer thickness. In each model, only the thickness variable was changed.

4.6.2.5 **Modeling Period**

The modeling period used was 67 years (the "baseline"). To further evaluate the impact of modeling runtime on the resultant PFt, one model was run with a modeling period of 97 years to capture the post-closure care period.

4.6.2.6 **Sensitivity Results**

Additional fate and transport model runs were completed to evaluate model sensitivities to changing model inputs. As shown in **Table 4-5**, using more conservative model input parameters resulted in PF_t values ranging from 7.18E-50 to 1.96E-3, all of which are less than the threshold value. Thus, this sensitivity analysis demonstrates that the FAB is not predicted to impact groundwater quality based on conditions more conservative than the baseline scenario. The sensitivity modeling results are presented in **Table 4-5** whereas the model outputs are included in **Appendix P**.

4.6.3 Reliability of Computer Model

The computer-based fate and transport model used for this analysis is based on rigorous and proven analytical solutions to the advection-dispersion equation for layered deposits. These equations were derived with the intent of modeling the physical and chemical transport of contaminants from waste impoundments. Widespread use, comprehensive documentation, and abundant publications ([14], [18], [19], [13], [20]) demonstratethe versatility of this modeling approach for assessing groundwater impacts. The outputs obtained from models conducted in POLLUTE can be compared to those obtained using other approaches to solving the advection-dispersion equation.

4.6.4 Degree of Conservativeness in Model Results

Input parameters for the baseline models were based on site-specific data whenever possible. When not possible, input values were derived from an understanding of the site and relevant peerreviewed literature. If a high degree of uncertainty was present, conservative input values were selected. A summary of the various conservative assumptions is listed below:

- The maximum measured leachate (i.e., porewater) concentration for each constituent was used for the fate and transport model prediction table;
- Constant leachate concentration or a constant mass was used for the entire modeling period. A specific mass could have been assumed for modeling purposes which would have resulted in decreased leachate concentrations over time, but to be conservative the model considered constant CCR porewater concentration over time;

- Adsorption can significantly reduce the concentrations of metal constituents as they move through soils, especially clays, which would retard or slow down the migration. The baseline model and about half of the sensitivity analyses, the model assumed no adsorption would occur over time;
- Degradation of concentrations (input values) through either the biologic or chemical process was assumed not to occur during the modeling period. By assuming no degradation, the model overestimated the predicted groundwater quality over time; and
- The CCR Rule requires compliance at the waste boundary. The analysis only considers vertical flow from the bottom of the FAB to the top of the uppermost aquifer; the analysis does not consider a horizontal flow towards the waste boundary, which would further lower the predicted concentration levels for COCs.

5. SUMMARY

This ALD has been prepared to assess if the FAB meets the ALD requirements per the CCR Rule. The data included comprehensive field and laboratory investigation data collected from the 1970s to 2020. The 2020 field and laboratory investigation studies were conducted specifically to fill data gaps to address the CCR Rule requirements. The data were incorporated into an EVS model to create a comprehensive conceptual site model to understand the lithology beneath the FAB and as a basis for the Fate and Transport analysis. The EVS model was relatively consistent with historic representations of the geology associated with the FAB.

Site-specific water was collected from different wells screened in CCR at the FAB and tested to assess which had the more aggressive water. Water from PZ-2 was deemed to be more aggressive and used for compatibility testing to estimate the impacts on the hydraulic conductivity of soil samples. The results of the testing program are presented in this ALD.

A comprehensive subsurface stratigraphy model was created using the available data set incorporated into the conceptual site model. Fate and transport analyses were conducted with PZ-2 chemistry water data to assess whether there is a reasonable probability that water from the FAB may result in a release to the groundwater during its active life that would exceed the GWPS at the waste boundary. The baseline fate and transport analysis was conducted using the available sitespecific data and an operating time period of 67 years, which captures the period from 1975, when operations started at the FAB, to 2041, when the existing Landfill within the FAB is planned to be closed.

The analysis considered different contaminant transport mechanisms including, advection, dispersion, and diffusion. The analysis indicates that advective flow would take more than 130 years for a water molecule to travel from the bottom of the FAB to the uppermost aquifer. Therefore, the analyses results indicate that, due to the low hydraulic conductivity of the in-situ soils, chemical diffusion is the dominant transport mechanism compared to advection or seepage flow. Consequently, the hydraulic conductivity testing described in Section 3 is sufficient to characterize hydraulic conductivity and demonstrate the performance of the alternate liner system as it relates to advection or seepage flow.

A sensitivity analysis was performed as part of additional fate and transport analyses to account for sampling bias, uncertainty, and natural variation in site-specific inputs. Predicted groundwater concentrations for both the baseline and sensitivity analyses are below GWPS.

The sensitivity analyses results show that there is no reasonable probability that water from the FAB will result in a release to the groundwater that would exceed the GWPS at the waste boundary over the projected active life of the FAB.

6. CERTIFICATION

CCR Unit: DTE Electric Company; Monroe Power Plant, Fly Ash Basin (FAB)

I, Clinton P. Carlson, being a Registered Professional Engineer in good standing in the State of Michigan, do hereby certify in accordance with the CCR Rule, to the best of my knowledge, information, and belief, that the information contained in this plan has been prepared in accordance with the accepted practice of engineering and that the FAB meets the requirements of the Alternative Liner Demonstration per the CCR Rule.

Clinton P. Carlson, Ph.D. Printed Name **CLINTON** CARLSON $LUMlon$ $LoUorn$ April 10, 2023 ENGINEER No. Signature Date 6201066842 **ADELISTING** 6201066842 Michigan February 16, 2025 Registration Number State Expiration Date

Affix Seal

REFERENCES

- [1] TRC, "Initial Application for an Alternative Liner Demonstration Monroe Power Plant, Fly Ash Basin Coal Combustion Residuals Unit," November 2020.
- [2] Geosyntec Consultants and Excel Geotechnical Testing, "Extension Request for Monroe Power Plant Fly Ash Basin Alternative Liner Demonstration," September 2021.
- [3] Geosyntec Consultants and Excel Geotechnical Testing, "Extension Request for Monroe Power Plant Fly Ash Basin Alternative Liner Demonstration," September 2022.
- [4] Geosyntec Consultants, "Preliminary Alternative Liner Demonstration Fly Ash Basin, Monroe Power Plant, Monroe, MI," January 2021.
- [5] American Society for Testing and Materials, "Standard Practice for Classification of Soils for Engineering Purposes (Unified Soil Classification System)," ASTM D2487, 2010.
- [6] American Society for Testing and Materials, "Standard Practice for Thin-walled Tube Sampling for Fine-grained Soils," ASTM D1587, 2015.
- [7] American Society for Testing and Materials, "Standard Practice for Sampling of Soil Using Hydraulically Operated Stationary Piston Sampler," ASTM D6519, 2015.
- [8] F. Leverette and F. B. Taylor, "The Pleistocene of Indiana and Michigan and the history of the Great Lakes," *U. S. Geological Survey,* vol. LIII, p. 529, 1915.
- [9] American Society for Testing and Materials, "Standard Test Methods for Measurement of Hydraulic Conductivity of Saturated Porous Materials Using a Flexible Wall Permeameter," ASTM D5084, 2016.
- [10] American Society for Testing and Materials, "Standard Test Method for Hydraulic Conductivity Compatibility Testing of Soils with Aqueous Solutions," ASTM D7100, 2020.
- [11] United States Environmental Protection Agency, "Human and Ecological Risk Assessment of Coal Combustion Residuals," Regulation Identifier Number: 2050-AE81, 2014.
- [12] R. K. Rowe, J. R. Booker and M. J. Fraser, "POLLUTEv7.13," GAEA Technologies, Ltd., Windsor, Ontario, Canada, 2007.

- [13] R. K. Rowe, "Contaminant Migrating Through Groundwater: The Role of Analysis in The Design of Barriers," *Canadian Geotechnical Journal,* vol. 25, no. 4, pp. 778-798, 1988.
- [14] A. Talbot, "The Accurate Numerical Integration of Laplace Transforms," *Journal of Applied Mathematics,* vol. 23, no. 1, pp. 97-120, 1979.
- [15] R. K. Rowe, R. M. Quigley, R. W. I. Brachman and J. R. Booker, "Clayey Barrier Systems for Waste Disposal Facilities," London, England, 2004.
- [16] M. N. Sara, Standard Handbook for Solid and Hazardous Waste Facility Assessments, Chelsea, MI: Lewis Publishers, 1993.
- [17] International Atomic Energy Agency, "Handbook of Parameter Values for the Prediction of Radionuclide Transfer in Temperature Environments," Vienna, Austria, 1994.
- [18] R. K. Rowe, "Pollutant Transport Through Barriers," Proceedings of ASCE Specialty Conference, Geotechnical Practice for Waste Disposal, pp. 159-181, Ann Arbor, MI, June 1987.
- [19] R. K. Rowe and J. R. Booker, "An Efficient Analysis of Pollutant Migration Through Soil," in *Numerical Methods for Transient and Coupled Systems*, Lewis, Hinton, Bettess and Schrefler, Eds., New York, NY, John Wiley & Sons Ltd., 1987, pp. 13-42.
- [20] R. K. Rowe and J. R. Booker, "Contaminant Migration Through a Liner Underlain by Fractured Till and an Aquifer," Geotechnical Research Center Report GEOT-12-89; Faculty of Engineering Science, University of Western Ontario, 1989.

TABLES

Table 2-1 – Field and Laboratory Testing Summary

CPT ID	Lithology Unit	Test Elevation (f ^t)	Hydraulic Conductivity (cm/s)
CPT20-028	Native	564.9	6.98E-7
CPT20-028	Native	559.9	2.77E-8
CPT20-048	Native	565.0	1.84E-7
CPT20-048	Native	559.9	$2.41E-8$
CPT20-130	Native	565.0	1.66E-7
CPT20-136	Native	549.1	3.29E-8

Table 2-2 – Pore Pressure Dissipation Tests Results

Sample ID	Units	$PZ-1$	$PZ-2$	$PZ-3$	$PZ-4$	$PZ-5$
Alkalinity, Total (as CaCO3	mg/L	460	1400	580	170	130
Antimony	mg/L	0.01 U	0.01 U	0.01 U	0.01 U	0.0092
Arsenic	mg/L	0.0158	0.0129	0.0079	0.218	0.058
Barium	mg/L	4.6	1.2	2.8	0.189	0.207
Beryllium	mg/L	0.00222	0.00224	0.004	0.00244	0.004
Boron	mg/L	11	8.9	6.3	4.9	24
Cadmium	mg/L	0.00217	0.004	0.004	0.0022	0.00169
Calcium	mg/L	230	74	187	111	550
Chloride	mg/L	48	32	34	37	26
Chromium	mg/L	0.0067	0.0082	0.0066	0.0075	0.01
Cobalt	mg/L	0.00569	0.00268	0.0055	0.0059	0.00534
Fluoride	mg/L	3.6	23	1.2	0.83	$0.4\,$
Iron	mg/L	0.62	0.95	0.51	0.77	0.21
Lead	mg/L	0.0062	0.0072	0.00593	0.0073	0.01

Table 3-1 – Chemistry Results of Site-Specific Filtered CCR Porewater

Notes:

U - Analyzed but not detected above the method detection limit. The method detection limit is shown.

Table 3-2 – Summary of Hydraulic Conductivity Tests Results [9]

ID	Date	Days After Injection	Hydraulic Conductivity (cm/s)	Pore Volumes Passed After Injection
B2-ST-1 (20-22')	February 19, 2021	$\overline{0}$	5.9E-9	$\overline{0}$
	December 23, 2022	672	5.9E-9	3.09
B4-ST-2 (40-42')	February 19, 2021	θ	4.7E-9	$\overline{0}$
	December 23, 2022	672	$3.3E-9$	1.46
B4-ST-4 (70-72.5')	February 19, 2021	θ	1.8E-8	$\overline{0}$
	December 23, 2022	672	6.8E-9	6.77
B6-ST-1 (25-27')	February 19, 2021	$\overline{0}$	$9.6E-9$	$\overline{0}$
	December 23, 2022	672	$6.6E-9$	4.06
B6-ST-3 (55-57.5')	February 19, 2021	$\overline{0}$	$1.2E-8$	$\overline{0}$
	December 23, 2022	672	8.5E-9	5.97
$B6-ST-4(65-67.5)$	February 19, 2021	$\overline{0}$	$1.5E-8$	$\overline{0}$
	December 23, 2022	672	$6.2E-9$	6.40
B9-ST-2 (40-42')	February 19, 2021	$\overline{0}$	$1.1E-8$	$\overline{0}$
	December 23, 2022	672	$1.0E-8$	5.65
B9-ST-3 (55-57')	February 19, 2021	$\overline{0}$	$2.7E-8$	$\overline{0}$
	December 23, 2022	672	6.7E-9	7.78

Table 3-3 – Summary of Compatibility Tests [10] **- Hydraulic Conductivity and Pore Volumes Passed Results**

Table 3-4 – Summary of Compatibility Tests [10] **- pH Results**

Sample ID	Parameter	EC Inflow $(\mu s/cm)$	EC Outflow $(\mu s/cm)$
	Min	4300	1111
B2-ST-1 (20-22')	Max	6660	3000
	Average	5842	1623
	Min	4780	990
B4-ST-2 (40-42')	Max	6330	1163
	Average	5807	1080
	Min	4120	1082
B5-ST-4 (70-72.5')	Max	6670	2360
	Average	5833	1536
B6-ST-1 (25-27')	Min	4170	928
	Max	9390	2660
	Average	5905	1450
B6-ST-3 (55-57.5')	Min	4350	1128
	Max	6780	3930
	Average	5792	1833
B6-ST-4 (65.67.5')	Min	3970	963
	Max	6570	3830
	Average	5639	1421
B9-ST-2 (40-42')	Min	4380	976
	Max	6570	3190
	Average	5859	1558
B9-ST-3 (55-57')	Min	4230	885
	Max	6480	2760
	Average	5742	1391

Table 3-5 – Summary of Compatibility Tests [10] **- Electrical Conductivity Results**

Table 3-6 – Summary of Compatibility Tests [10] **- Termination Criteria**

 \sim
				MW-16-01			MW-16-02		MW-16-03	MW-16-04		MW-16-05		MW-16-06		MW-16-07		
Constituents	Unit	GWPS Selection		MCL/RSL	UTL	GWPS	UTL	GWPS										
Antimony	mg/L	MCL	6.0E-03	$2.1E-03$	6.0E-03	2.0E-03	6.0E-03											
Arsenic	mg/L	MCL	1.0E-02	5.0E-03	1.0E-02	5.0E-03	1.0E-02	5.0E-03	1.0E-02	5.0E-03	1.0E-02	5.0E-03	1.0E-02	5.0E-03	1.0E-02	5.0E-03	1.0E-02	
Barium	mg/L	MCL	$2.0E + 00$	$2.2E-02$	$2.0E + 00$	1.0E-02	$2.0E + 00$	$2.1E-02$	$2.0E + 00$	1.3E-02	2.0E+00	1.8E-02	$2.0E + 00$	3.4E-02	$2.0E + 00$	1.0E-02	$2.0E + 00$	
Beryllium	mg/L	MCL	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03	1.0E-03	4.0E-03	
Cadmium	mg/L	MCL	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03	1.0E-03	5.0E-03	
Chromium	mg/L	MCL	1.0E-01	2.0E-03	1.0E-01	2.0E-03	1.0E-01	$3.1E-03$	1.0E-01	2.0E-03	1.0E-01	2.0E-03	1.0E-01	2.0E-03	1.0E-01	2.0E-03	1.0E-01	
Cobalt	mg/L	RSL	6.0E-03	1.0E-03	6.0E-03	1.0E-03	6.0E-03	1.0E-03	6.0E-03	1.0E-03	6.0E-03	1.0E-03	6.0E-03	1.6E-03	$6.0E-03$	1.0E-03	6.0E-03	
Fluoride	mg/L	MCL	$4.0E + 00$	$1.8E + 00$	$4.0E + 00$	1.8E+00	$4.0E + 00$	$1.7E + 00$	$4.0E + 00$	$1.1E + 00$	4.0E+00	L.7E+00	4.0E+00	$1.8E + 00$	4.0E+00	1.8E+00	$4.0E + 00$	
Lead	mg/L	RSL	1.5E-02	1.0E-03	1.5E-02	1.0E-03	1.5E-02	2.5E-03	1.5E-02	1.0E-03	1.5E-02	1.0E-03	1.5E-02	1.1E-03	1.5E-02	1.0E-03	$1.5E-02$	
Lithium	mg/L	Background or RSL	4.0E-02	$9.2E-02$	$9.2E - 02$	1.2E-01	1.2E-01	1.3E-01	1.3E-01	$2.3E-02$	4.0E-02	5.0E-02	5.0E-02	1.0E-01	1.0E-01	4.3E-02	4.3E-02	
Mercury	mg/L	MCL	$2.0E-03$	2.0E-04	2.0E-03	2.0E-04	2.0E-03	2.0E-04	2.0E-03	2.0E-04	2.0E-03	2.0E-04	2.0E-03	2.0E-04	2.0E-03	2.0E-04	2.0E-03	
Molybdenum	mg/L	RSL	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01	1.0E-02	1.0E-01	
Radium-226/228	pCi/L	MCL	$5.0E + 00$	$1.3E + 00$	5.0E+00	$4.0E + 00$	$5.0E + 00$	$3.0E + 00$	$5.0E + 00$	$1.2E + 00$	$5.0E + 00$	2.7E+00	5.0E+00	$1.1E + 00$	5.0E+00	4E+00	$5.0E + 00$	
Selenium	mg/L	MCL	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02	5.0E-03	5.0E-02	
Thallium	mg/L	MCL	$2.0E-03$	1.0E-03	2.0E-03	1.0E-03	2.0E-03	1.0E-03	2.0E-03	1.0E-03	2.0E-03	1.0E-03	2.0E-03	1.0E-03	2.0E-03	1.0E-03	2.0E-03	

Table 4-1 – Groundwater Protection Standards

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

ug/L = micrograms per liter

mg/L = milligrams per liter

Table 4-2 –Baseline Fate and Transport Results

Notes:

* = Laboratory RL is used here; all analyses were below the RL.

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

ug/L = micrograms per liter

mg/L = milligrams per liter

Table 4-3 Background and Maximum Predicted Concentrations Compared to GWPS

				MW-16-01							
			Data								
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail				
			(A)	(B)	$(A+B)$						
Antimony	mg/L	MCL	$2.1E-03$	2.0E-06	$2.1E-03$	6.0E-03	Pass				
Arsenic	mg/L	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass				
Barium	mg/L	MCL	2.3E-02	8.4E-04	2.4E-02	2.0	Pass				
Beryllium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass				
Cadmium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass				
Chromium	mg/L	MCL	2.0E-03	$3.1E-06$	2.0E-03	0.10	Pass				
Cobalt	mg/L	RSL	1.0E-03	1.0E-06	1.0E-03	6.0E-03	Pass				
Fluoride	mg/L	MCL	1.80	9.6E-03	1.81	4.0	Pass				
Lead	mg/L	RSL	1.0E-03	$2.1E-06$	1.0E-03	1.5E-02	Pass				
Lithium	mg/L	Background	7.8E-02	1.4E-04	7.8E-02	$9.2E-02$	Pass				
Mercury	mg/L	MCL	2.0E-04	8.0E-08	2.0E-04	2.0E-03	Pass				
Molybdenum	mg/L	RSL	1.0E-02	3.8E-03	1.4E-02	0.10	Pass				
Radium-226/228	pCi/L	MCL	8.5E-04	7.6E-04	1.6E-03	5.0E-03	Pass				
Selenium	mg/L	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass				
Thallium	mg/L	MCL	1.0E-03	3.0E-07	1.0E-03	2.0E-03	Pass				

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

Table 4-3 Background and Predicted Concentrations Compared to GWPS

					MW-16-02						
			Data								
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail				
			(A)	(B)	$(A+B)$						
Antimony	mg/L	MCL	2.0E-03	2.0E-06	2.0E-03	6.0E-03	Pass				
Arsenic	mg/L	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass				
Barium	mg/L	MCL	9.0E-03	8.4E-04	9.8E-03	$2.0E + 00$	Pass				
Beryllium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass				
Cadmium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass				
Chromium	mg/L	MCL	2.0E-03	$3.1E-06$	2.0E-03	1.0E-01	Pass				
Cobalt	mg/L	RSL	1.0E-03	1.0E-06	1.0E-03	6.0E-03	Pass				
Fluoride	mg/L	MCL	1.70	9.6E-03	1.71	4.00	Pass				
Lead	mg/L	RSL	1.0E-03	$2.1E-06$	1.0E-03	1.5E-02	Pass				
Lithium	mg/L	Background	$1.1E-01$	1.4E-04	$1.1E-01$	1.2E-01	Pass				
Mercury	mg/L	MCL	$2.0E-04$	8.0E-08	2.0E-04	2.0E-03	Pass				
Molybdenum	mg/L	RSL	$1.0E-02$	3.8E-03	1.4E-02	1.0E-01	Pass				
Radium-226/228	pCi/L	MCL	3.3E-03	7.6E-04	4.1E-03	5.0E-03	Pass				
Selenium	mg/L	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass				
Thallium	mg/L	MCL	1.0E-03	3.0E-07	1.0E-03	2.0E-03	Pass				

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

Table 4-3 Background and Predicted Concentrations Compared to GWPS

			MW-16-03							
			Data							
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail			
			(A)	(B)	$(A+B)$					
Antimony	mg/L	MCL	2.0E-03	2.0E-06	2.0E-03	6.0E-03	Pass			
Arsenic	mg/L	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass			
Barium	mg/L	MCL	$2.1E-02$	8.4E-04	$2.2E-02$	$2.0E + 00$	Pass			
Beryllium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass			
Cadmium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass			
Chromium	mg/L	MCL	$3.1E-03$	$3.1E-06$	$3.1E-03$	1.0E-01	Pass			
Cobalt	mg/L	RSL	1.0E-03	1.0E-06	1.0E-03	6.0E-03	Pass			
Fluoride	mg/L	MCL	1.60	9.6E-03	$1.6E + 00$	$4.0E + 00$	Pass			
Lead	mg/L	RSL	2.5E-03	$2.1E-06$	2.5E-03	1.5E-02	Pass			
Lithium	mg/L	Background	1.2E-01	1.4E-04	1.2E-01	1.3E-01	Pass			
Mercury	mg/L	MCL	2.0E-04	8.0E-08	2.0E-04	2.0E-03	Pass			
Molybdenum	mg/L	RSL	1.0E-02	3.8E-03	1.4E-02	1.0E-01	Pass			
Radium-226/228	pCi/L	MCL	5.8E-04	7.6E-04	1.3E-03	5.0E-03	Pass			
Selenium	mg/L	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass			
Thallium	mg/L	MCL	1.0E-03	3.0E-07	1.0E-03	2.0E-03	Pass			

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

Table 4-3 Background and Predicted Concentrations Compared to GWPS

			MW-16-04								
			Data								
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail				
			(A)	(B)	$(A+B)$						
Antimony	Ω	MCL	2.0E-03	2.0E-06	2.0E-03	6.0E-03	Pass				
Arsenic	GWPS	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass				
Barium	6	MCL	$1.1E-02$	8.4E-04	$1.2E-02$	$2.0E + 00$	Pass				
Beryllium	10	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass				
Cadmium	2000	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass				
Chromium	$\overline{4}$	MCL	2.0E-03	$3.1E-06$	2.0E-03	1.0E-01	Pass				
Cobalt	5	RSL	1.0E-03	1.0E-06	1.0E-03	6.0E-03	Pass				
Fluoride	100	MCL	1.10	9.6E-03	$1.1E + 00$	$4.0E + 00$	Pass				
Lead	6	RSL	1.0E-03	$2.1E-06$	1.0E-03	1.5E-02	Pass				
Lithium	4	RSL	$2.1E-02$	1.4E-04	$2.1E-02$	4.0E-02	Pass				
Mercury	15	MCL	2.0E-04	8.0E-08	2.0E-04	2.0E-03	Pass				
Molybdenum	40	RSL	1.0E-02	3.8E-03	1.4E-02	1.0E-01	Pass				
Radium-226/228	pCi/L	MCL	9.7E-04	7.6E-04	1.7E-03	5.0E-03	Pass				
Selenium	100	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass				
Thallium	5	MCL	1.0E-03	3.0E-07	1.0E-03	$2.0E-03$	Pass				

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

Table 4-3 Background and Predicted Concentrations Compared to GWPS

					MW-16-05					
			Data							
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail			
			(A)	(B)	$(A+B)$					
Antimony	mg/L	MCL	2.0E-03	$2.0E-06$	2.0E-03	6.0E-03	Pass			
Arsenic	mg/L	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass			
Barium	mg/L	MCL	1.4E-02	8.4E-04	1.5E-02	$2.0E + 00$	Pass			
Beryllium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass			
Cadmium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass			
Chromium	mg/L	MCL	2.0E-03	$3.1E-06$	$2.0E-03$	1.0E-01	Pass			
Cobalt	mg/L	RSL	1.0E-03	1.0E-06	1.0E-03	6.0E-03	Pass			
Fluoride	mg/L	MCL	1.60	9.6E-03	$1.6E + 00$	$4.0E + 00$	Pass			
Lead	mg/L	RSL	1.0E-03	$2.1E-06$	1.0E-03	1.5E-02	Pass			
Lithium	mg/L	Background	4.7E-02	1.4E-04	4.7E-02	5.0E-02	Pass			
Mercury	mg/L	MCL	2.0E-04	8.0E-08	2.0E-04	$2.0E-03$	Pass			
Molybdenum	mg/L	RSL	1.0E-02	3.8E-03	1.4E-02	1.0E-01	Pass			
Radium-226/228	pCi/L	MCL	2.3E-03	7.6E-04	3.0E-03	5.0E-03	Pass			
Selenium	mg/L	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass			
Thallium	mg/L	MCL	1.0E-03	3.0E-07	1.0E-03	2.0E-03	Pass			

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

ug/L = micrograms per liter

 $mg/L =$ milligrams per liter

Table 4-3 Background and Predicted Concentrations Compared to GWPS

					MW-16-06					
			Data							
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail			
			(A)	(B)	$(A+B)$					
Antimony	mg/L	MCL	2.0E-03	2.0E-06	2.0E-03	6.0E-03	Pass			
Arsenic	mg/L	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass			
Barium	mg/L	MCL	3.4E-02	8.4E-04	3.5E-02	$2.0E + 00$	Pass			
Beryllium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass			
Cadmium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass			
Chromium	mg/L	MCL	2.0E-03	3.1E-06	2.0E-03	1.0E-01	Pass			
Cobalt	mg/L	RSL	1.6E-03	1.0E-06	1.6E-03	6.0E-03	Pass			
Fluoride	mg/L	MCL	1.70	9.6E-03	$1.7E + 00$	4.0E+00	Pass			
Lead	mg/L	RSL	$1.1E-03$	$2.1E-06$	$1.1E-03$	1.5E-02	Pass			
Lithium	mg/L	Background	9.4E-02	1.4E-04	9.4E-02	1.0E-01	Pass			
Mercury	mg/L	MCL	2.0E-04	8.0E-08	2.0E-04	2.0E-03	Pass			
Molybdenum	mg/L	RSL	1.0E-02	3.8E-03	1.4E-02	1.0E-01	Pass			
Radium-226/228	pCi/L	MCL	$9.2E-04$	7.6E-04	1.7E-03	5.0E-03	Pass			
Selenium	mg/L	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass			
Thallium	mg/L	MCL	1.0E-03	3.0E-07	1.0E-03	2.0E-03	Pass			

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

Table 4-3 Background and Predicted Concentrations Compared to GWPS

					MW-16-07					
			Data							
Constituent	Unit	GWPS Selection	Maximum Observed Concentration	Maximum Predicted Concentration	Combined Concentration	GWPS	Pass/Fail			
			(A)	(B)	$(A+B)$					
Antimony	mg/L	MCL	2.0E-03	2.0E-06	2.0E-03	6.0E-03	Pass			
Arsenic	mg/L	MCL	5.0E-03	4.4E-05	5.0E-03	1.0E-02	Pass			
Barium	mg/L	MCL	9.4E-03	8.4E-04	1.0E-02	$2.0E + 00$	Pass			
Beryllium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	4.0E-03	Pass			
Cadmium	mg/L	MCL	1.0E-03	8.0E-07	1.0E-03	5.0E-03	Pass			
Chromium	mg/L	MCL	2.0E-03	3.1E-06	2.0E-03	1.0E-01	Pass			
Cobalt	mg/L	RSL	1.0E-03	1.0E-06	1.0E-03	6.0E-03	Pass			
Fluoride	mg/L	MCL	1.70	9.6E-03	$1.7E + 00$	4.0E+00	Pass			
Lead	mg/L	RSL	1.0E-03	$2.1E-06$	1.0E-03	1.5E-02	Pass			
Lithium	mg/L	Background	3.9E-02	1.4E-04	3.9E-02	4.3E-02	Pass			
Mercury	mg/L	MCL	2.0E-04	8.0E-08	2.0E-04	2.0E-03	Pass			
Molybdenum	mg/L	RSL	1.0E-02	3.8E-03	1.4E-02	1.0E-01	Pass			
Radium-226/228	pCi/L	MCL	$1.1E-03$	7.6E-04	1.9E-03	5.0E-03	Pass			
Selenium	mg/L	MCL	5.0E-03	3.4E-05	5.0E-03	5.0E-02	Pass			
Thallium	mg/L	MCL	1.0E-03	3.0E-07	1.0E-03	2.0E-03	Pass			

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

mg/L = milligrams per liter

Table 4-5 – Sensitivity Analysis Model Results

 $**$ This sensitivity model run did not come to full convergence, because the prediction factor was below 10^{-50} . Therefore, the lowest calculated prediction factor was reported.

FIGURES

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16.0 14.0 12.0 10.0 \blacksquare \blacksquare \mathbf{u} m. \blacksquare \blacksquare \overline{a} 8.0 6.0Inflow 4.0 **D** Outflow 2.0 ±10% of Inflow0.02/19/2021 2/19/2021 5/23/2021 8/24/2021 11/25/2021 2/26/2022 5/30/2022 8/31/2022 12/2/2022 3/5/2023

MONROE POWER PLANT MONROE, MICHIGAN

Geosyntec^D **Figure** consultants Geosyntec Consultants of Michigan **3-40** Detroit, MI April 2023

APPENDIX A – MONITORING WELL SLUG TEST RESULTS

2016 Slug Test Results

Hydraulic Conductivity Results

DTE Electric Company Monroe Power Plant Fly Ash Basin

Monroe, Michigan

Conversion:

$$
\frac{1 \text{ cm}}{1 \text{ sec}} \times \frac{86,400 \text{ sec}}{1 \text{ day}} \times \frac{1 \text{ ft}}{30.48 \text{ cm}} = 2.83 \text{ E} + 03 \quad \frac{\text{ ft}}{\text{444 \text{ cm}}}
$$

Notes:

Slug test results calculated using the Bower-Rice (1976) Solution.

2021 Slug Test Results

2021 Hydraulic Conductivity Results Summary DTE Electric Company Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill 7955 East Dunbar Road, Monroe, Michigan

K = Hydraulic Conductivity

NA = Not applicable

WC = water column height in well

A pneumatic air slug was utilized to complete slug tests in these artesian free flowing wells in September 2021.

APPENDIX B – MONITORING WELL CONSTRUCTION DIAGRAMS

APPENDIX C - 1970s BORING LOGS

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SOIL SAMPLE DATA $\mathsf{Lob}\cdot\mathbf{B}$ Laboratory Dry Unit Sample Sample Woter Field Depth Consistency^{*} Content Weight Elev., So, No Faat $%$ by $p, c, f,$ Faut Dry Wt. Plastic $LS-1$ 2.5 570.7 Firm 21.3 $107 - 6$ 5.0 568.2 108_o <u> 15-2</u> Hard 20.7 8.40 $LS-3$ 566.2 12.4 126.1 7.0 V.Hard 8610 Hard to 7209 Bzsc $LS-4$ 10.0 133.8 | 121.] 563.2 V. Hard Firm to $LS-5$ 15.0 558.2 Stiff 12.3 | 126.6 Compact $LS-6$ $|20.0|553.2|$ VF Sand | 17.5 | 111.6 $|25.0|548.2|V.Hard$ IS-7 | 10.7 | 131.2 $\frac{1}{\frac{1}{1200}}$ Limestone Fragments 30.0 | 543.2 W/SItaCly $BS = 8$ * Laboratory consistency based upon visual examination of sample independent of field evaluation and strength determined by feboratory test, **MON 172** SOIL AND FOUNDATIONS ASSOCIATES 29563 NORTHWESTERN HIGHWAY SOUTHFIELD, MICHIGAN 48075 LOG OF TEST BORING NO. 4 TR4 PLUM CREEK PROPERTY PROPOSED FLYASH SETTLING BASIN MONROE POWER PLANT THE DETROIT EDISON COMPANE 0 ATE: \leq -7-7/ JOB NO. 128-A APPR: GAO

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ROCK CORE DIAMETER: Nx (2-1/8")

SEA
Porm
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SOIL SAMPLE DATA Laboratory $LGD - B$ Sompte Sampie Woter Dry Unit Freid Depth. Consistency⁴ Elev, Content Waight Sa. No Fest Feat $\%$ by $|$ p.c.f. Dry Wt. $LS-1$ $2.5567.4 \mid v_{\text{stiff}}$ $O(186)$ $22.9 | 104.4$ 5.0 564.9 $LS-2$ 16.2 117.1 Stiff -4520 7.5 562.4 $LS-3$ 14.8 120.2 Stiff 7320 <u>10.0 559.9 v.stiff</u> $LS - 4$ $\frac{1}{2}$ \equiv $LS-5$ | 15.0 554.9 | V_{sstiff} $11.3|129.4|$ - 1188 \mathscr{N} <u>LS-6 20.0 549.9 v.stiff</u> $\,$ $LS-7$ 24.0 545.9 V. Hard $8.8|136.5$ (7280) $rac{1}{4}$ $LS-8$ 29.0 540.9 V. Hard $9.6|132.9$ 7520 $\frac{1}{\epsilon_{\text{288}}}$ <u>LS-9</u> <u>34.0535.9</u> Hard <u> 12.7 123.9</u> BS-10 36.3 533.6 Rock Frags $BS-11$ μ .2 528.7 $w/HG.C1ay$ 43.3 526.6 Core Run $18.3521.6$ <u> No.l</u> \mathcal{F} $\sqrt{30.2}$ 53.3 516.6 * Laboratory consistency based upon viewal examination of somple, Independent of field evaluation and strength determined by **Taboratory test, MON 175** SOIL AND FOUNDATIONS ASSOCIATES 29563 NORTHWESTERN HIGHWAY SOUTHFIELD, MICHIGAN 48075 LOG OF TEST BORING NO. 7 TB7 PLUM CREEK PROPERTY PROPOSED FLYASH SETTLING BASIN MONROE POWER PLANT THE DETROIT EDISON COMPANY APPR: GAO DATE: $20 - 80 - 20$ $\sqrt{108 \text{ No. } 128 - A}$

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** 1.75" O.D. ichigan Liner Sampler used through LS-7; 2.00" O.D. Meavy wall sampler used below

-OTRANSVERSE SHEARING RESISTANCE, LBS. PER SQ. FT.

 $\overline{500}$

BOO NE HALF UNCONFINED COMPRESSIVE STRENGTH, LBS. PER SQ. FT.

(BASED UPON ORIGINAL CROSS-SECTION OF SPECIMEN)

 $\overline{300}$

 $\overline{1000}$

4000

 400

200

 550 Hard Dark Gray VF SANDY SILTY CLAY, w/Some Gravel & Rock Fragments. (GLACIAL TILL) Lt.Gray Broken DOLOMITE. (Roller bit used)35.2

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LOCATION:

INSPECTOR: **DRILLER:**

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CONTRACTOR:

TOTAL DEPTH: 3512"

 570

560

Classifications by:

LOG OF SUBSURFACE PROFILE

Ground Surface Elev. = $\overline{577.3}$ Ft. (IGLD) Datum)

W/Some Sand, Traces of Gravel.

Hole dry-augered to $d=15$ ^t
Used $18^{t}6^{u}$ of 3^{u} casing.

concrete.

BORING STARTED: July 17, 1970

BORING COMPLETED: July 17, 1970

ROCK CORE DIAMETER: Where

on Sept. 9, 1970.

N-3600; W-1350

B. Singleton

waTER LEVEL in hole at indicated number of hours after completion of boring; 2.5 feet of casing in place. * PENETRATION: Number of blows required to drive

 $\frac{31 \times 100}{21 \times 100}$ coil sampler $\frac{20}{20}$ inches, using $\frac{1}{2}$

Encountered ground water;
artesian flow; initial = μ gpm,

Artesian head = $E1.589.5$ at completion;

Hole grouted $w/3$ bags of cement & 1 bag dry

No water flow during final inspection

See Test Boring Location Plan

 $J.$ O. Wanzeck $(SkFA)$

weight with $\frac{3a}{2a}$ inch free fall. Ne = Evaluated Blows/Foot

Able Drilling, Inc.

 $=$ El.590.4 after 2 hours.

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after 30 minutes = μ .1 gpm

Driller and S&FA

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Bernard Bank

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SOIL SAMPLE DATA L ab 8 **Laboratary Somole** Sample .
Woter Dry Uni Field Depth., Elev. Consistency[#] Content Weight Sa, No. Fast l Feat $\%$ by $|p_{\rm c,f}|\rangle$ Dry Wt 2.5 571.7 Firm 103.1 $LS-1$ 22.1 F_1 F_2^m F_3^m 5.0 569.2 $LS-2$ 25.1 102.0 7.5 566.7 1.62 $LS-3$ Stiff 23.0 101.3 $9.5|564.7|v_{\text{stiff}}$ 4560 $LS-L$ 20.8 109.0 14.5 559.7 v. Stiff $LS-5$ 12.0 128.6 1848 $\frac{1}{2}$ <u>19.0 555.2 V. Hard</u> $LS-6$ 12.1 132.6 14880 24.0 550.2 V . Hard 4432 LS-7 11.2 | 127.4 L_{S-8} 29.0 545.2 V. Hard 8.9 133.9 / 8 L + 0 * Laboratory consistency based upon visual examination of sample, independent of field evaluation and strength determined by taboratory test. . **MON 181** SOIL AND FOUNDATIONS ASSOCIATES 29563 NORTHWESTERN HIGHWAY SOUTHFIELD, MICHIGAN 48075 LOG OF TEST BORING NO. 13 TB 13 PLUM CREEK PROPERTY PROPOSED FLYASH SETTLING BASIN MONROE POWER PLANT THE DETROIT EDISON COMPANY $APRR$: $= 10$ arte ≤ 12 Jue No. 128-A

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water LEVEL in hole at indicated number of hours ofter completion of boring; _____ feet of casing in place. * PENETRATION: Number of blows required to drive $*$ inch 0.0. soil sampler \bigcirc inches, using 40 h weight with 30 inch free fall. Ne-Evaluated Blows/Foot ROCK CORE DIAMETER: $\forall x$ (2²)

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above ground surface (E1.594.8), flow was approx.37 gpm when upper casing was removed.
At completion of boring artesian water flowed at rate of 75 gpm with casing 1'8" above
ground surface.Casing capped overnite; extended

Extreme difficulty experienced in grouting hole and stopping artesian flow; used 28 mement, 7 bags of dry-mix concrete k l bag of bentonite during period of 15 hours to stop

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SOIL SAMPLE DATA Laboratory
Consistency ³⁶ Lab & Water Dry Unit Sample Somple Field Depth., Elev., Content: Weight Sa. No Fast $|$ Feet. $\frac{1}{2}$ % by $\frac{1}{2}$ p.c.f. Dry Wt. Medium 569.6 to Firm
Medium
567.1 to Firm <u>LS-1</u> 2.5 \sim \sim 5.0 $LS-2$ $\ddot{}$ $LS-3$ 7.5 564.6 Stiff \sim \sim $-$ IS-4 10.0 562.1 V. Stiff \rightarrow $-$ <u>15-5 15.0 557.1 V. Stiff</u> \equiv $LS-6$ 20.0 552.1 $V.$ Stiff \sim **COM** <u>LS-7 25.0 547.1</u> Hard $\frac{1}{2}$ <u>LS-8 30.0 542.1</u> 16800 <u>V. Hard 12.1 127.5</u> 18250 * Laboratory consistency based upon visual examination of sample. independent of field evaluation and strength determined by faboratory fest. **MON 190** SOIL AND FOUNDATIONS ASSOCIATES 29563 NORTHWESTERN HIGHWAY SOUTHFIELD, MICHIGAN 48075 LOG OF TEST BORING NO. 22 TB 22 PLUM CREEK PROPERTY PROPOSED FLYASH SETTLING BASIN MONROE POWER PLANT THE DETROIT EDISON COMPANY JOB NO. 128-A APPR: GA^{α} DATE: $6-7-7$

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ROCK CORE DIAMETER: None

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ROCK CORE DIAMETER: None

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ROCK CORE DIAMETER: None

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SOIL SAMPLE DATA Dry Uni Lob 6 **Laboratory** Water Somnie Somole Weight Content Consistancy³⁶ Freid Depth, Elev₁ p, c, t . $\%$ by So No Fast. i Feat Dry Wt. Firm to
V.Stiff 13.6 125.8 $5.0567.9$ 6720 **LS-1** V.Stiff
to Hard 7.5 565.L $LS-2$ <u>13.0 125.6</u> .
د 12 13.3 124.1 $18 - 3$ <u>10,0 562.9</u> $76B₀$ Hard 12.3 125.9 12.5569 h <u> 19-4</u> Stiff 12.6 125.7 $15.0557.9$ $LS-5$ Stiff 13.4 126.2 **LS-6** $20.0552.9$ Stiff 4510 11.3 131.7 25.0 547.9 v.stiff $LS-7$ * Laboratory consistency based upon visual examination of sample independent of field evaluation and strength determined by taboratory test. **MON 202** SOIL AND FOUNDATIONS ASSOCIATES 29563 NORTHWESTERN HIGHWAY SOUTHFIELD, MICHIGAN 48075 LOG OF TEST BORING NO. 34 TB 34 PLUM CREEK PROPERTY PROPOSED FLYASH SETTLING BASIN MONROE POWER PLANT THE DETROIT EDISON COMPANY DATE: \leftarrow = - - - | JOB NO. 128-A APPR: GAP

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ROCK CORE DIAMETER: None

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APPENDIX D – 1990s BORING LOGS

SOIL BORING LOCATION DIAGRAM VERIFICATION OF SOIL BARRIER MONROE, MICHIGAN

BAY CITY KALAMAZOO LANSING PLYMOUTH **TOLEDO**

soil and materials engineers, inc.

APPENDIX E – 2016 BORING LOGS

265996-0001-000_Stat.mxd

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MONITORING WELLS

APPROXIMATE BOUNDARY OF FLY ASH BASIN

NOTES

- 1. BASE MAP IMAGERY FROM ESRI/MICROSOFT, "WORLD IMAGERY", WEB BASEMAP SERVICE LAYER.
- 2. WELL LOCATIONS SURVEYEDBY BMJ ENGINEERS AND SURVEYORS INC. IN MARCH AND MAY 2016.

 $\overline{5}$ NAD 1983 UTM Zone

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APPENDIX F - 2020 BORING LOGS

APPENDIX G – 1970s LABORATORY TEST RESULTS

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APPENDIX H – 1990s LABORATORY TEST RESULTS

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TABLE 1

LABORATORY TEST RESULTS VERIFICATION OF NATURAL SOIL BARRIER - MONROE ASH BASIN SME PROJECT NO. PG-22087

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TABLE 1

LABORATORY TEST RESULTS VERIFICATION OF NATURAL SOIL BARRIER - MONROE ASH BASIN SME PROJECT NO. PG-22087

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APPENDIX I – 2016 LABORATORY TEST RESULTS

APPENDIX J – 2020 LABORATORY TEST RESULTS

953 Forrest Street, Roswell, Georgia 30075
Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST⁽¹⁾

ASTM D5084

- 384.45%

${\hbox{\bf Notes}}$

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: $ST =$ Shelby Tube, $R =$ Remolded, $B =$ Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST (1)

ASTM D5084

2012-07-18

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: $ST =$ Shelby Tube, $R =$ Remolded, $B =$ Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST⁽¹⁾

ASTM D5084

Project Name: Project Number: Client Name: Site Sample ID: Lab Sample Number: Material Type: Specified Value (cm/sec): Date Test Started:

2012021

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: ST = Shelby Tube, R = Remolded, B = Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

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FLEXIBLE WALL PERMEABILITY TEST⁽¹⁾

ASTM D 5084

Project Name: **Project Number: Client Name:** Site Sample ID: Lab Sample Number: **Material Type:**

Date Test Started:

Specified Value (cm/sec):

Monroe Ash Basin ALD PN1016 **Geosyntec Consultants** B4-ST-3 (55-57.5') 20L131 Soil NA 1/20/2021

rex 2021

Notes:

1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.

- 2. Specimen Type: $ST =$ Shelby Tube, $DT =$ Drive Tube $BS =$ Block Sample, Ot = Others
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075
Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST (1) **ASTM D5084**

PROPER

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: $ST =$ Shelby Tube, $R =$ Remolded, $B =$ Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST⁽¹⁾ ASTM D5084

Project Name: Project Number: Client Name: Site Sample ID: Lab Sample Number: Material Type: Specified Value (cm/sec): Date Test Started:

28-20-15

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: ST = Shelby Tube, R = Remolded, B = Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537, www.excelgeotesting.com

FLEXIBLE WALL PERMEABILITY TEST⁽¹⁾

ASTM D5084

Project Name: Project Number: Client Name: Site Sample ID: Lab Sample Number: Material Type: Specified Value (cm/sec): Date Test Started:

2020767

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: ST = Shelby Tube, R = Remolded, B = Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

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FLEXIBLE WALL PERMEABILITY TEST (1)

ASTM D5084

Project Name: Project Number: Client Name: Site Sample ID: Lab Sample Number: Material Type: Specified Value (cm/sec): Date Test Started:

2020207

- 1. Method C, "Falling-Head, Increasing-Tailwater" test procedures were followed during the testing.
- 2. Specimen preparation: $ST =$ Shelby Tube, $R =$ Remolded, $B =$ Block Sample.
- 3. Type of permeant liquid: DTW = Deaired Tap Water, DDW = Deaired Deionized (Distilled) Water

953 Forrest Street, Roswell, Georgia 30075 Tel: (770) 910 7537 Fax: (770) 910 7538

LAST PAGE

Test Applicability and Limitations:

- The results are applicable only for the materials received at the laboratory and tested which may or may not be representative of the materials at the site.

Storage Policy:

- Uncontaminated Material: All samples (or what is left) will be archived for a period of 3 months from the date received. Thereafter the samples will be discarded unless a written request for extended storage is received. A rate of \$1.00 per sample per day will be applied after the initial 3 month storage period.

- Contaminated Material: All samples (or what is left) will be archived for a period of 3 months from the date received. Thereafter, the samples will be returned^{to} the project manager or his/her designated receiver unless a written request for extended storage is received. A rate of \$1.30 per sample per day will be applied after the initial 3 months storage.

APPENDIX K1 - CPT LOGS

Job No: 20-61-21655 Client: Geosyntec Consultants

Project: DTE Monroe Power Plan DTE Monroe Power Plant Start Date: 01-Dec-2020 14-Dec-2020

Job No: 20-61-21655 Client: Geosyntec Consultants

Project: DTE Monroe Power Plan DTE Monroe Power Plant Start Date: 01-Dec-2020 14-Dec-2020

Job No: 20-61-21655 Client: Geosyntec Consultants

Project: DTE Monroe Power Plan DTE Monroe Power Plant Start Date: 01-Dec-2020 14-Dec-2020

Job No: 20-61-21655 Client: Geosyntec Consultants Project: DTE Monroe Power Plant Start Date: 01-Dec-2020 End Date: 14-Dec-2020

1. The assumed phreatic surface was provided by the client. Hydrostatic condictions were assumed for the calculated parameters.

2. Coordinates were acquired using a MR-350 GlobalSat GPS Receiver in datum: WGS84 / UTM Zone 17 North and were converted to Michigan State Plane South, NAD83 (international feet).

3. No pore pressure data from 16.300m- 22.925m (53.48ft - 75.21ft) due to equipment issues.

4. No clear phreatic surface detected.

APPENDIX K2 – PPD TEST RESULTS

a. Time is relative to where umax occurred.

b. Houlsby and Teh, 1991.

1. The cone was left in the ground overnight and final final pore pressure readings was taken the next morning.

Sounding: CPT20-092 Cone: 675:T1500F15U500 Area=15 cm²

Duration: 210.0 s

u Final: 117.5 ft

APPENDIX L – CHEMISTRY ANALYSIS OF SITE-SPECIFIC WATER

05-Jan-2021

Geosyntec Consultants Michael Coram 2100 Commonwealth Blvd. Ann Arbor, MI 48105 Suite 100

Re: **DTE- Monroe (GLP-8014)** Work Order: **20121750**

Dear Michael,

ALS Environmental received 5 samples on 18-Dec-2020 10:00 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental - Holland and for only the analyses requested.

Sample results are compliant with industry accepted practices and Quality Control results achieved laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 26.

If you have any questions regarding this report, please feel free to contact me:

ADDRESS: 3352 128th Avenue, Holland, MI, USA PHONE: +1 (616) 399-6070 FAX: +1 (616) 399-6185

Sincerely,

Electronically approved by: Chad Whelton

Enuironmental

Project Manager Chad Whelton

Report of Laboratory Analysis

Certificate No: MN 026-999-449

ALS GROUP USA, CORP Part of the ALS Laboratory Group A Campbell Brothers Limited Company

www.alsqlobal.com

Work Order Sample Summary

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Samples for the above noted Work Order were received on 12/18/2020. The attached "Sample Receipt Checklist" documents the status of custody seals, container integrity, preservation, and temperature compliance.

Samples were analyzed according to the analytical methodology previously transmitted in the "Work Order Acknowledgement". Methodologies are also documented in the "Analytical Result" section for each sample. Quality control results are listed in the "QC Report" section. Sample association for the reported quality control is located at the end of each batch summary. If applicable, results are appropriately qualified in the Analytical Result and QC Report sections. The "Qualifiers" section documents the various qualifiers, units, and acronyms utilized in reporting. A copy of the laboratory's scope of accreditation is available upon request.

With the following exceptions, all sample analyses achieved analytical criteria.

Metals:

No other deviations or anomalies were noted.

Wet Chemistry:

Batch R306912, Method SW9040C, Sample PZ-3 (20121750-03B): Possible bias due to sodium error at pH > 10. A low sodium electrode is not used in the measurement process.

Batch R306825, Method SW9040C, Sample LCS-R306825: Samples were processed outside of holding time for pH, as the analysis is a field test and holding time is defined as 15 minutes.Batch R307145, Method IC_9056_W, Sample 20121752-03B MSD: 1

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Client: Geosyntec Consultants

Project: DTE- Monroe (GLP-8014)

Sample ID: PZ-1

Collection Date: 12/14/2020 08:00 AM **Matrix:** GROUNDWATER

Work Order: 20121750 **Lab ID:** 20121750-01

Sample ID: PZ-2

Project: DTE- Monroe (GLP-8014)

Client: Geosyntec Consultants

Work Order: 20121750 **Lab ID:** 20121750-02

Collection Date: 12/14/2020 09:00 AM **Matrix:** GROUNDWATER

Work Order: 20121750 **Lab ID:** 20121750-03

Sample ID: PZ-3

Collection Date: 12/15/2020 08:00 AM **Matrix:** GROUNDWATER

Project: DTE- Monroe (GLP-8014)

Client: Geosyntec Consultants

Sample ID: PZ-4

Project: DTE- Monroe (GLP-8014)

Client: Geosyntec Consultants

Work Order: 20121750 **Lab ID:** 20121750-04

Collection Date: 12/14/2020 10:00 AM **Matrix:** GROUNDWATER

Note: See Qualifiers page for a list of qualifiers and their definitions.

Analytical Results Page 4 of 5

Work Order: 20121750 **Lab ID:** 20121750-05

Sample ID: PZ-5

Client: Geosyntec Consultants

Project: DTE- Monroe (GLP-8014)

Collection Date: 12/15/2020 10:00 AM **Matrix:** GROUNDWATER

QC BATCH REPORT

Batch ID: 169919 Instrument ID HG4 Method: **SW7470A MBLK** Sample ID: **MBLK-169919-169919**

Client: Geosyntec Consultants **Work Order:** 20121750

Project: DTE- Monroe (GLP-8014)

Batch ID: **170071** Instrument ID **HG4** Method: **SW7470A**

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

QC BATCH REPORT
Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Client: Geosyntec Consultants **Work Order:** 20121750

Project: DTE- Monroe (GLP-8014)

QC BATCH REPORT

Batch ID: **169592** Instrument ID **TDS** Method: **A2540 C-11**

Batch ID: **R306822** Instrument ID **Titrator 1** Method: **A2320 B-11**

The following samples were analyzed in this batch: 20121750-01B 20121750-02B 20121750-04B

Batch ID: **R306825** Instrument ID **Titrator 1** Method: **SW9040C**

Batch ID: **R306910** Instrument ID **Titrator 1** Method: **A2320 B-11**

The following samples were analyzed in this batch: 20121750-03B 20121750-05B

Batch ID: **R306912** Instrument ID **Titrator 1** Method: **A4500-H B-11**

Batch ID: **R307142** Instrument ID IC3 Method: **SW9056A**

Batch ID: **R307145** Instrument ID IC4 Method: **SW9056A**

Batch ID: **R307276** Instrument ID IC3 Method: **SW9056A**

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited

Copyright 2011 by ALS Environmental.

ALS Group, USA

Sample Receipt Checklist

Login Notes:

LIMS Version: 7.012

Tuesday, January 19, 2021

Michael Coram Geosyntec Consultants 2100 Commonwealth Blvd. Suite 100 Ann Arbor, MI 48105

Re: ALS Workorder: 2012398 Project Name: DTE - Monroe Project Number: GLP-8014

Dear Mr. Coram:

Five water samples were received from Geosyntec Consultants, on 12/18/2020. The samples were scheduled for the following analyses:

The results for these analyses are contained in the enclosed reports.

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, ALS certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental.

Thank you for your confidence in ALS Environmental. Should you have any questions, please call.

Sincerely,

Mir Ellija

ALS Environmental Julie Ellingson Project Manager

www.alsglobal.com

Accreditations: ALS Environmental – Fort Collins is accredited by the following accreditation bodies for various testing scopes in accordance with requirements of each accreditation body. All testing is performed under the laboratory management system, which is maintained to meet these requirement and regulations. Please contact the laboratory or accreditation body for the current scope testing parameters.

40 CFR Part 136: All analyses for Clean Water Act samples are analyzed using the 40 CFR Part 136 specified method and include all the QC requirements.

2012398

Radium-228:

The samples were analyzed for the presence of 228 Ra by low background gas flow proportional counting of ²²⁸Ac, which is the ingrown progeny of ²²⁸Ra, according to the current revision of SOP 724.

All acceptance criteria were met.

Radium-226:

The samples were prepared and analyzed according to the current revision of SOP 783.

All acceptance criteria were met.

Sample Number(s) Cross-Reference Table

OrderNum: 2012398 **Client Name:** Geosyntec Consultants **Client Project Name:** DTE - Monroe **Client Project Number:** GLP-8014 **Client PO Number:**

ţ 2. Unless outer was agreed in a formal contract, services provided by ALS Edwirommental are
3. The Chain of Custody is a legal document. All information must be completed accurately.

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ALS Environmental - Fort Collins CONDITION OF SAMPLE UPON RECEIPT FORM

 $\langle \rangle$

+IR Gun #3, VWR SN 170647571 +IR Gun #5, VWR SN 192272629

SAMPLE SUMMARY REPORT

B - Result is less than the requested reporting limit but greater than the instrument method detection limit (MDL).

U or ND - Indicates that the compound was analyzed for but not detected.

E - The reported value is estimated because of the presence of interference. An explanatory note may be included in the narrative.

M - Duplicate injection precision was not met.

N - Spiked sample recovery not within control limits. A post spike is analyzed for all ICP analyses when the matrix spike and or spike duplicate fail and the native sample concentration is less than four times the spike added concentration.

Z - Spiked recovery not within control limits. An explanatory note may be included in the narrative.

* - Duplicate analysis (relative percent difference) not within control limits.

S - SAR value is estimated as one or more analytes used in the calculation were not detected above the detection limit.

Organics:

U or ND - Indicates that the compound was analyzed for but not detected.

B - Analyte is detected in the associated method blank as well as in the sample. It indicates probable blank contamination and warns the data user.

E - Analyte concentration exceeds the upper level of the calibration range.

J - Estimated value. The result is less than the reporting limit but greater than the instrument method detection limit (MDL).

A - A tentatively identified compound is a suspected aldol-condensation product.

X - The analyte was diluted below an accurate quantitation level.

* - The spike recovery is equal to or outside the control criteria used.

- + The relative percent difference (RPD) equals or exceeds the control criteria.
- G A pattern resembling gasoline was detected in this sample.
- D A pattern resembling diesel was detected in this sample.
- M A pattern resembling motor oil was detected in this sample.

C - A pattern resembling crude oil was detected in this sample.

- 4 A pattern resembling JP-4 was detected in this sample.
- 5 A pattern resembling JP-5 was detected in this sample.
- H Indicates that the fuel pattern was in the heavier end of the retention time window for the analyte of interest.
- L Indicates that the fuel pattern was in the lighter end of the retention time window for the analyte of interest.

Z - This flag indicates that a significant fraction of the reported result did not resemble the patterns of any of the following petroleum hydrocarbon products:

- gasoline
- JP-8 - diesel
- mineral spirits
- motor oil - Stoddard solvent
- bunker C

ALS -- Fort Collins **Date:** *1/19/2021 2:19:4*

Project: GLP-8014 DTE - Monroe **Client:** Geosyntec Consultants **Work Order:** 2012398

QC BATCH REPORT

Project: GLP-8014 DTE - Monroe

QC BATCH REPORT

2012398-4 2012398-5

APPENDIX M – ALD HYDRAULIC CONDUCTIVITY TEST RESULTS

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Compatibility Test Results

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Project Name: Monroe Ash Basin ALD

APPENDIX N – GROUNDWATER PROTECTION STANDARD CALCULATIONS

DTE Electric Company (DTE Electric) is pursuing an Alternate Liner Demonstration (ALD) for the Monroe Power Plant (MONPP) Fly Ash Basin (FAB) coal combustion residual (CCR) unit. On November 12, 2020, the U.S. EPA published the Part B: Alternate Demonstration for Unlined Surface Impoundments amendments to the CCR Rule^{[1](#page-1450-0)} ("Part B") that allows a facility to prepare a demonstration to request approval to operate an existing CCR surface impoundment with an alternate liner. Although the MONPP FAB remains in detection monitoring, per § 257.71(d)(1)(ii)(C)(2), the ALD must demonstrate that, for each Appendix IV constituent, there is no reasonable probability that the peak groundwater concentration that may result from releases that occur over the active life of the CCR surface impoundment will exceed the groundwater protection standard (GWPS) at the waste boundary.

GWPSs are set as either specific regulatory standards identified in the CCR Rule or background groundwater concentrations, whichever is higher, for the Appendix IV constituents. Per the CCR Rule $\S 257.95$ $\S 257.95$ $\S 257.95$ (h) 2 , the EPA maximum contaminant levels (MCLs) will be the GWPSs for those constituents that have established MCLs. For Appendix IV constituents 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 equal to the background level.

This memorandum presents the background statistical limits and GWPS derived for the Appendix IV parameters for the MONPP FAB CCR unit using the aforementioned approach pursuant to §257.95(h). Per 40 CFR §257.94, a minimum of eight rounds of background sampling for the Appendix IV constituents were completed at the MONPP FAB from August 2016 through July 2017, as part of

¹ On April 17, 2015, the U.S. EPA issued the Final Rule: Disposal of CCR from Electric Utilities (CCR Rule), 40 CFR 257, Subpart D, to regulate the disposal of CCR materials generated at coal-fired units.

² As amended per Phase One, Part One of the CCR Rule (83 FR 36435).

initiating the detection monitoring program. Since fluoride is in both the Appendix III and Appendix IV constituent lists, additional fluoride data were collected under the detection monitoring program subsequent to July 2017 and were also used in the development of the GWPS. All of the Appendix IV data used in this analysis (August 2016 through December 2020) and details on how the data were collected are included in the annual reports prepared in accordance with the CCR Rule through January 2021.

The background data for the MONPP FAB were evaluated in accordance with the *Groundwater Statistical Evaluation Plan* (Stats Plan) (TRC, October 2017). Per the Stats Plan, the MONPP FAB CCR unit uses an intra-well statistical approach. For intra-well methods, the background data set is comprised of the historical data established at each individual monitoring well, which accounts for natural spatial variability that occurs in background encountered across the site. Background data were evaluated utilizing ChemStat™ statistical software. ChemStat™ 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 ChemStat™ 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 and is an acceptable approach under the CCR Rule. As such, upper tolerance limits (UTLs) were calculated for each of the CCR Appendix IV parameters, and, given that intra-well methods have been established for this site, a background UTL was calculated for each monitoring well and used to compare to the respective MCL or RSL The following narrative describes the methods employed and the results obtained for the UTL calculations and the resulting GWPSs. The ChemStat™ output files are included as an attachment.

The set of background wells utilized for MONPP FAB includes MW-16-01 through MW-16-07. The background data evaluation included the following steps:

- Review of data quality checklists 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;
- **Dutilier testing of individual data points that appear from the graphical representations as potential** outliers;
- Evaluation of percentage of non-detects for each baseline/background well-constituent (w/c) pair;
- Distribution of the data;
- Calculation of the UTLs for each cumulative baseline/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, 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 time versus concentration (T v. C) graphs (Attachment A) do not show potential or suspect outliers for any of the Appendix IV parameters.

While variations in results are present, the graphs show consistent baseline data and do not suggest that data sets, as a whole, likely have overall trending or seasonality. However, due to limitations on CCR Rule implementation timelines, the data sets, with the exception of fluoride, are of relatively short duration for making such observations regarding overall trending or seasonality.

Outlier Testing

No outliers were identified in the T v. C graphs. Therefore, outlier testing was not applicable.

Distribution of the Data Sets

ChemStat™ was utilized to evaluate each data set for normality. If the skewness coefficient was calculated to be between negative one and one, then the data were assumed to be approximately normally distributed. If the skewness coefficient was calculated as greater than one (or less than negative one) then the calculation was performed on the natural log (Ln) of the data. If the Ln of the data still determined that the data appeared to be skewed, then the Shapiro‐Wilk test of normality (Shapiro‐Wilk) was performed. The Shapiro‐Wilk statistic was calculated on both non‐transformed data and the Ln-transformed data. If the Shapiro‐Wilk statistic indicated that normal distributional assumptions were not valid, then the parameter was considered a candidate for non-parametric statistical evaluation. The data distributions are summarized in Table 1.

Tolerance Limits

Table 1 presents the calculated UTLs for the background/baseline data sets. As discussed above, the MONPP FAB CCR unit uses intra-well statistical methods; therefore, UTLs were calculated for each individual monitoring well. For normal and lognormal distributions, UTLs are calculated for 95 percent confidence using parametric methods. For nonnormal background datasets, a nonparametric UTL is utilized, resulting in the highest value from the background dataset as the UTL. The achieved confidence levels for nonparametric tolerance limits depend entirely on the number of background data points, which are shown in the ChemStat™ outputs. The intra-well tolerance limits for each parameter were compared to the MCL/RSL and the higher value was established as the GWPS for that well.

Groundwater Protection Standards

The resulting GWPSs were established as the higher of the MCL/RSL or the UTL for each Appendix IV constituent at each monitoring well. The GWPSs are summarized in Table 2.

Attachments

Table 1 – Summary of Descriptive Statistics and Tolerance Limit Calculations Table 2 – Summary of Groundwater Protection Standards

Attachment A – ChemStat™ Outputs

Tables

Notes:

 $2.14275 > 1$ -1 < 0.537721 < 1 0.818 > 0.781314

Shapiro-Wilks 5% Critical Value

Skewness Coefficient Shapiro-Wilks 3%

PQL = Practical Quantitation Limit

ug/L = micrograms per liter

mg/L = milligrams per liter

Notes:

 $2.14275 > 1$ -1 < 0.537721 < 1 0.818 > 0.781314 Skewness Coefficient Shapiro-Wilks 3%

Shapiro-Wilks 5%

PQL = Practical Quantitation Limit

ug/L = micrograms per liter

mg/L = milligrams per liter

pCi/L = picocuries per liter

Critical Value

Notes:

 $2.14275 > 1$ -1 < 0.537721 < 1 0.818 > 0.781314 Skewness Coefficient

Shapiro-Wilks 5% -Critical Value

Shapiro-Wilks 'W' Statistic

PQL = Practical Quantitation Limit

ug/L = micrograms per liter

mg/L = milligrams per liter

Notes:

 $2.14275 > 1$ -1 < 0.537721 < 1 0.818 > 0.781314 Skewness Coefficient

Shapiro-Wilks 5% -

Critical Value

Shapiro-Wilks 'W' Statistic

PQL = Practical Quantitation Limit

ug/L = micrograms per liter

mg/L = milligrams per liter

Notes:

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Shapiro-Wilks 5% -Critical Value

PQL = Practical Quantitation Limit

ug/L = micrograms per liter

mg/L = milligrams per liter

Table 2 Summary of Groundwater Protection Standards DTE Electric Company – Monroe Fly Ash Basin

Notes:

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

RSL - Regional Screening Level from 83 FR 36435.

UTL - Upper Tolerance Limit (95%) of the background data set.

GWPS - Groundwater Protection Standard. Appendix IV GWPS is the higher of the MCL/RSL and UTL.

ug/L = micrograms per liter

mg/L = milligrams per liter

Attachment A ChemStat™ Outputs

Lithium

Concentrations (ug/L) Parameter: Antimony Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 55 Percent Non-Detects: 98.2143% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Arsenic Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 0 Percent Non-Detects: 0% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Beryllium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Cadmium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Chromium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 55 Percent Non-Detects: 98.2143% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Cobalt Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 55 Percent Non-Detects: 98.2143% Total Background Measurements: 0 There are 0 background locations

Concentrations (mg/L) Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 105 Total Non-Detect: 0 Percent Non-Detects: 0% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Lead Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 53 Percent Non-Detects: 94.6429% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 0 Percent Non-Detects: 0% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Mercury Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Molybdenum Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (pci/L) Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 1 Percent Non-Detects: 1.78571% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Selenium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Concentrations (ug/L) Parameter: Thallium Original Data (Not Transformed) Non-Detects Replaced with Detection Limit Total Measurements: 56 Total Non-Detect: 56 Percent Non-Detects: 100% Total Background Measurements: 0 There are 0 background locations

Skewness Coefficient Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

All Locations

Skewness Coefficient Parameter: Barium Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-01 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 5.7324 Sample Standard Deviation = 2.46403 W Statistic = 0.773186

5% Critical value of 0.818 exceeds 0.773186 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 is less than 0.773186 Data is normally distributed at 99% level of significance

Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-01 Normality Test of Parameter Concentrations Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 0.328054 Sample Standard Deviation = 0.138965 W Statistic = 0.796129

5% Critical value of 0.818 exceeds 0.796129 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 is less than 0.796129 Data is normally distributed at 99% level of significance

Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-03 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 9.83076 Sample Standard Deviation = 4.36657 W Statistic = 0.724093

5% Critical value of 0.818 exceeds 0.724093 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 exceeds 0.724093 Evidence of non-normality at 99% level of significance
Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-03 Normality Test of Parameter Concentrations Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 0.776723 Sample Standard Deviation = 0.325539 W Statistic = 0.813257

5% Critical value of 0.818 exceeds 0.813257 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 is less than 0.813257 Data is normally distributed at 99% level of significance

Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-06 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 15.7649 Sample Standard Deviation = 7.58767 W Statistic = 0.616693

5% Critical value of 0.818 exceeds 0.616693 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 exceeds 0.616693 Evidence of non-normality at 99% level of significance

Shapiro-Wilks Test of Normality Parameter: Barium Location: MW-16-06 Normality Test of Parameter Concentrations Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values = 0.834388 Sample Standard Deviation = 0.36549 W Statistic = 0.74454

5% Critical value of 0.818 exceeds 0.74454 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 exceeds 0.74454 Evidence of non-normality at 99% level of significance

Skewness Coefficient Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Skewness Coefficient Parameter: Fluoride Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Shapiro-Wilks Test of Normality Parameter: Fluoride Location: MW-16-01 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL $K = 7$ for 15 measurements

Sum of b values = 0.78619 Sample Standard Deviation = 0.244488 W Statistic = 0.738606

5% Critical value of 0.881 exceeds 0.738606 Evidence of non-normality at 95% level of significance

1% Critical value of 0.835 exceeds 0.738606 Evidence of non-normality at 99% level of significance Shapiro-Wilks Test of Normality Parameter: Fluoride Location: MW-16-01 Normality Test of Parameter Concentrations Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

 $K = 7$ for 15 measurements

Sum of b values = 0.551771 Sample Standard Deviation = 0.175662 W Statistic = 0.704751

5% Critical value of 0.881 exceeds 0.704751 Evidence of non-normality at 95% level of significance

1% Critical value of 0.835 exceeds 0.704751 Evidence of non-normality at 99% level of significance

Skewness Coefficient Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Skewness Coefficient Parameter: Lithium Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Shapiro-Wilks Test of Normality Parameter: Lithium Location: MW-16-05 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values $= 6.5119$ Sample Standard Deviation = 2.66927 W Statistic = 0.850222

5% Critical value of 0.818 is less than 0.850222 Data is normally distributed at 95% level of significance

1% Critical value of 0.749 is less than 0.850222 Data is normally distributed at 99% level of significance

Skewness Coefficient Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Skewness Coefficient Parameter: Radium-226/228 Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

Skewness > 1 indicates positively skewed data Skewness < -1 indicates negatively skewed data

Shapiro-Wilks Test of Normality Parameter: Radium-226/228 Location: MW-16-07 Normality Test of Parameter Concentrations Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values $= 0.421788$ Sample Standard Deviation = 0.177044 W Statistic = 0.810823

5% Critical value of 0.818 exceeds 0.810823 Evidence of non-normality at 95% level of significance

1% Critical value of 0.749 is less than 0.810823 Data is normally distributed at 99% level of significance

Shapiro-Wilks Test of Normality Parameter: Radium-226/228 Location: MW-16-07 Normality Test of Parameter Concentrations Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

 $K = 4$ for 8 measurements

Sum of b values $= 0.546956$ Sample Standard Deviation = 0.220765 W Statistic = 0.876893

5% Critical value of 0.818 is less than 0.876893 Data is normally distributed at 95% level of significance

1% Critical value of 0.749 is less than 0.876893 Data is normally distributed at 99% level of significance

Non-Parametric Tolerance Interval Parameter: Antimony Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 87.5% Background measurements $(n) = 8$ Maximum Background Concentration = 2.1 Minimum Coverage = 68.8% Average Coverage = 88.8889%

Non-Parametric Tolerance Interval MW-16-01Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 0% Background measurements $(n) = 8$ Maximum Background Concentration = 21.5 Minimum Coverage = 68.8% Average Coverage = 88.8889%

MW-16-01

Non-Parametric Tolerance Interval Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 0% Background measurements (n) = 15 Maximum Background Concentration = 1.8 Minimum Coverage = 81.9% Average Coverage = 93.75%

Parametric Tolerance Interval Analysis MW-16-01Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 71 Background standard deviation = 6.58461 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 91.9917

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

MW-16-01

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 0.592313 Background standard deviation = 0.222588 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 1.30192

Parametric Tolerance Interval Analysis Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 7.74375 Background standard deviation = 0.826109 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 10.3774

Parametric Tolerance Interval Analysis Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 1.54 Background standard deviation = 0.0910259 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.77357

Parametric Tolerance Interval Analysis Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 95.6875 Background standard deviation = 8.88392 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 124.009

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

MW-16-02

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 2.72188 Background standard deviation = 0.388403 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 3.9601

Non-Parametric Tolerance Interval MW-16-03Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 0% Background measurements $(n) = 8$ Maximum Background Concentration = 21 Minimum Coverage = 68.8% Average Coverage = 88.8889%

MW-16-03

Non-Parametric Tolerance Interval Parameter: Chromium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 87.5% Background measurements $(n) = 8$ Maximum Background Concentration = 3.1 Minimum Coverage = 68.8% Average Coverage = 88.8889%

Parametric Tolerance Interval Analysis MW-16-03 Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 1.51333 Background standard deviation = 0.0833809 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.72729

Non-Parametric Tolerance Interval MW-16-03Parameter: Lead Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 75% Background measurements $(n) = 8$ Maximum Background Concentration = 2.5 Minimum Coverage = 68.8% Average Coverage = 88.8889%

Parametric Tolerance Interval Analysis Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 104.625 Background standard deviation = 9.30342 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 134.284

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

MW-16-03

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 2.33375 Background standard deviation = 0.212464 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 3.01109

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 10.0938 Background standard deviation = 0.833426 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 12.7507

Parametric Tolerance Interval Analysis Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 0.961 Background standard deviation = 0.064868 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.12745

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 18.4375 Background standard deviation = 1.54544 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 23.3644

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 0.727625 Background standard deviation = 0.148982 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 1.20258

Parametric Tolerance Interval Analysis Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 10.4125 Background standard deviation = 2.23443 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 17.5359

Parametric Tolerance Interval Analysis Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 1.45 Background standard deviation = 0.0981981 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.70198

Parametric Tolerance Interval Analysis Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 41.375 Background standard deviation = 2.66927 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 49.8846
Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

MW-16-05

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 1.7125 Background standard deviation = 0.319855 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 2.7322

Non-Parametric Tolerance Interval Parameter: Barium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 0% Background measurements $(n) = 8$ Maximum Background Concentration = 34 Minimum Coverage = 68.8% Average Coverage = 88.8889%

MW-16-06

Non-Parametric Tolerance Interval Parameter: Cobalt Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 87.5% Background measurements $(n) = 8$ Maximum Background Concentration = 1.6 Minimum Coverage = 68.8% Average Coverage = 88.8889%

Parametric Tolerance Interval Analysis Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 1.55333 Background standard deviation = 0.0915475 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.78824

Non-Parametric Tolerance Interval Parameter: Lead Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

Total Percent Non-Detects = 87.5% Background measurements $(n) = 8$ Maximum Background Concentration = 1.1 Minimum Coverage = 68.8% Average Coverage = 88.8889%

Parametric Tolerance Interval Analysis Parameter: Lithium Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 78.875 Background standard deviation = 7.8638 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 103.945

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

MW-16-06

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = -0.366475 Background standard deviation = 0.143131 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 0.0898265

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 8.55 Background standard deviation = 0.570714 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 10.3694

Parametric Tolerance Interval Analysis Parameter: Fluoride Original Data (Not Transformed) Non-Detects Replaced with 1/2 DL

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 15 Background mean = 1.48667 Background standard deviation = 0.10601 One-sided normal tolerance factor (K) at 95% confidence = 2.566 Upper tolerance limit = 1.75869

MW-16-07

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = 34.8125 Background standard deviation = 2.59033 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 43.0705

Parametric Tolerance Interval Analysis Parameter: Radium-226/228 Natural Logarithm Transformation Non-Detects Replaced with 1/2 DL

MW-16-07

USEPA 1989 Guidance Tolerance Limit Formula (One-Tailed)

Background observations = 8 Background mean = -0.353994 Background standard deviation = 0.220765 One-sided normal tolerance factor (K) at 95% confidence = 3.188 Upper tolerance limit = 0.349805

APPENDIX O – FATE AND TRANSPORT MODEL INPUTS

Calculation Package

 $Geosyntec$

COMPUTATION COVER SHEET

TABLE OF CONTENTS

1. PURPOSE

The purpose of this calculation package is to calculate the vertical Darcy velocity of the model lithology for input in Fate and Transport numerical model at the Monroe Power Plant Fly Ash Basin (FAB). Following Darcy velocity calculation, the solution is used to calculate the time of travel from the FAB to the Uppermost Aquifer.

2. ASSUMPTIONS

- Vertical flow is the dominant influence on contaminant transport; horizontal flow is not considered since a one-dimensional model was selected.
- Vertical hydraulic conductivity calculated in the laboratory using samples \bullet collected from borings is representative of subsurface conditions.

3. DARCY VELOCITY SOLUTION

The Darcy velocity (q) through the model lithologies/layers is expressed in m/year =

$$
=K(i)=K\left(\frac{H_1-H_2}{l_1-l_2}\right)
$$

Where,

$q =$	Darcy velocity in m/year $(=\text{cm/s} * 315360) =$ 3	6.08 x 10^3 m/year
$l_2=$	Average elevation of well screen midpoints = 532.95^{T} ft	
$l_1=$	Elevation of bottom of $FAB =$	563 ft
$H_2=$	Average water level elevation from monitoring wells (data provided in Attachment 2) =	583.8 ¹ ft
H _l	Total head at the bottom of $FAB =$	609 ft
$K =$	Geomean of Sandy Lean Clay hydraulic conductivity value (data provided in Attachment 1) =	2.27×10^{-8} cm/s
Thus:		
$l_1 - l_2 =$	distance in direction of flow	
$H_1 - H_2 =$	difference in hydraulic head between the FAB water level and the upper most aquifer potentiometric surface	
$i =$	vertical gradient	
vertical hydraulic conductivity (laboratory measured) $K =$		

^{1.} Value is an average taken from all monitoring wells with the exception of the outlier MW-16-04

4. TRAVEL TIME SOLUTION

Travel time through the model lithology is expressed in years $=$

$$
T = t / \left(\frac{K * i}{n}\right)
$$

Where:

Note: Time travel is not an input to Pollute model. It has been calculated to provide time estimate for the travel of water molecule from the bottom of FAB to top of uppermost aquifer.

Attachment 1

Permeability Data Evaluation Table 0-1

Attachment 2

Table 1

Groundwater Elevation Summary – April and October 2020

Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill – RCRA CCR Monitoring Program

Monroe, Michigan

Notes:

Negative depth to water measurement indicates artesian conditions, actual measured water level is above the top of casing.

Elevations are reported in feet relative to the North American Vertical Datum of 1988.

ft BTOC - feet below top of casing

(1) Water level meaured on October 6, 2020.

POLLUTE Model Inputs

 $\hat{\textbf{r}}$

Notes:

1. Kv = Vertical Hydraulic conductivity as determined by the analysis of field and laboratory data summarized in Table O-1.

2. Analysis of vertical hydraulic conductivity includes data from long term tests updated on 8/20/2021

3. CoHD = Coefficient of Hydrodynamic Dispersion

4. Effective Porosity determined by multiplying estimated porosity from field and lab data by 0.81, based on data provided by Sara, 1994.

5. Distribution Coefficient, Kd of 0.0082 m3/kg was used for Molybdenum, for minimum thickness sensitivity analysis.

Model Thickness

Reference Material

R. Kerry Rowe, Robert M. Quigley, Richard W.I. Brachman & John R. Booker

Figure 8.10 Chloride and potassium concentration versus depth in sample for model D (modified from Rowe et al., 1988).

variation in concentration with depth in the soil at the end of each test. The consistency of results demonstrates the power of the analytical model (program POLLUTE) and provides some con-

Figure 8.11 Chloride and potassium concentration versus depth in sample for model E (modified from Rowe et al., 1988).

Diffusion and distribution coefficients

fidence in the parameters D and ρK_d for the clay and source fluids examined.

To provide an indication of parameter variation that might be expected for a given soil, a number of tests were duplicated. The diffusion coefficient, D, for chloride was deduced for each model and ranged between 0.018 and $0.02 \text{ m}^2/\text{a}$ with an average value of $0.019 \,\mathrm{m}^2/\mathrm{a}$. This small variation in D does not appear to be related to small differences in Darcy velocity, nor does it appear to be particularly related to the nature of the associated cation (see Table 8.3). Rather, the variability from 0.018 to $0.02 \,\mathrm{m}^2/\mathrm{a}$ is seen as an indication of the level of repeatability that may be achieved for this type of test.

The application of an effective stress to the soil sample adopted in these tests is not an essential part of the proposed technique for determining the parameters D and K_d . Tests performed for the particular combination of clay and permeants considered herein gave similar results both with and without the application of the effective stress. However, for some combinations of clay and permeant, shrinkage of the clay may occur in the absence of a confining stress and this can give quite misleading results (e.g., see Quigley and Fernandez, 1989). For these clays, and for GCLs (see Chapter 12), tests should be performed at an effective stress similar to that anticipated in the field.

8.3.2 Pure diffusion tests

In many cases, it is not necessary to perform an advection-diffusion test. Under these circumstances, a simple diffusion test can be performed for boundary conditions shown in Figure 8.2. In this test, the soil sample is placed in a Plexiglass cylinder by trimming the sample to a size marginally greater than the specimen and then pressing the specimen into the cylinder, using a cutting shoe attached to the cylinder, to perform the final trim. This procedure is found to work well for many clays. However, it does not work well for clays with a significant stone content because the

Table 5-9 Porosity, Residual Saturation and Effective Porosity of Common Soils

First line is the mean value Second line is + one standard deviation about the mean

Adapted from: Rawls, W.J., D.C. Brakensiek, K.E. Saxton, 1982

The ratio of effective porosity to total porosity is 0.81 for Clay, and 0.88 for Silty Clay. Use 0.81 to be conservative.

TECHNICAL REPORTS SERIES No. $\bf{364}$

Handbook of Parameter Values for the Prediction of Radionuclide Transfer in Temperate Environments

Produced in collaboration with the **International Union of Radioecologists**

INTERNATIONAL ATOMIC ENERGY AGENCY, VIENNA, 1994

 $\mathcal{O}(\mathcal{O}(\log n))$

 $\mathcal{L}^{\text{max}}_{\text{max}}$

APPENDIX P – FATE AND TRANSPORT MODEL OUTPUTS

POLLUTEv7

Version 7.13

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Monroe_Baseline

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

Calculated Concentrations at Selected Times and Depths

NOTICE

Although this program has been tested and experience would indicate that it is accurate within the limits given by the assumptions of the theory used, we make no warranty as to workability of this software or any other licensed material. No warranties either expressed or implied (including warranties of fitness) shall apply. No responsibility is assumed for any errors, mistakes or misrepresentations that may occur from the use of this computer program. The user accepts full responsibility for assessing the validity and applicability of the results obtained with this program for any specific case.
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Monroe_ExtendedRun_Kd

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_DoubleDarcy_Kd

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.0122 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_CoHD_High_Kd

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_CoHD_Low

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_Porosity_High

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_Porosity_Low_Kd

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_Thick

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

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Monroe_Thin_Kd

THE DARCY VELOCITY (Flux) THROUGH THE LAYERS Va = 0.00608 m/year

Layer Properties

Boundary Conditions

Contant Concentration

Source Concentration = 1 mg/L

 Infinite Thickness Bottom Boundary

Laplace Transform Parameters

 TAU = 7 **N =** 20 **SIG =** 0 **RNU =** 2

Attachment C

Additional Aquifer Characterization Report

Additional Uppermost Aquifer Characterization Study

Monroe Power Plant Fly Ash Basin CCR Unit, 7955 East Dunbar Road, Monroe, Michigan

April 2023

 m illen

Clint Miller, PhD., PG. Senior Project Geochemist

VΜ

Vincent Buening, C.P.G. Senior Project Manager

Prepared For: DTE Electric Company

Prepared By:

TRC 1540 Eisenhower Pl. Ann Arbor, MI 48108

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Alexander Eklund Data Scientist

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APPENDICES

- Appendix A December 2022 Laboratory Data
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1.0 Introduction

1.1 Purpose and Objectives

The objective of this report is to document TRC's Additional Aquifer Characterization Study performed at the Monroe Power Plant (MONPP) Fly Ash Basin (FAB) Coal Combustion Residual unit (hereinafter "the CCR unit"), which is located at the Monroe Power Plant, Monroe, Michigan. This study was performed to determine if additional data, collected in December 2022, provide further lines of evidence to substantiate that groundwater in the uppermost aquifer is unimpacted by CCR operations. This additional uppermost aquifer characterization study is complementary to the preliminary alternative liner demonstration (ALD) prepared in accordance with 40 CFR §257.71 (d) that was submitted to the United States Environmental Protection Agency (EPA) on November 30, 2021 (Geosyntec, November 2021), and the previous studies (TRC, 2017, Detroit Edison, 1995) performed to establish the groundwater monitoring program developed pursuant to 40 CFR §257.91.

Previous studies performed at the site including the ALD have demonstrated and verified that the site is underlain by a thick laterally- continuous clay-rich deposit which meets the requirements of an alternate liner per 40 CFR §257.71 (d). The site characterization and groundwater data collected to-date from the CCR unit indicate that the natural underlying clay hydraulically separates the CCR unit from the uppermost aquifer and that groundwater quality is not affected by the CCR unit or any associated management activities. The data and analysis presented within the preliminary ALD further confirms the pre-existing site conceptual model, and through rigorous field testing and site-specific flow and transport modeling demonstrates the effectiveness of the clay. The preliminary ALD demonstrates that there is no reasonable probability that water from the CCR unit will result in a release to the uppermost aquifer throughout the CCR units active life, nor will data exceed the groundwater protection standard at the waste boundaries over the projected active life and post closure of the CCR unit.

This additional characterization study included the collection of additional groundwater samples during December 2022, along with further analyses of existing data to further characterize the uppermost aquifer. Water samples were collected from the CCR unit groundwater monitoring well network, the pore water from the CCR Fly Ash Basin (FAB), the FAB discharge point, and from nearby surface water bodies (Plum Creek and Lake Erie). Laboratory analysis performed during December 2022 included additional geochemical indicators, stable isotopes, and radiometric isotopes. Stable isotopes do not decay, but preferentially fractionate under physical, chemical and or environmental conditions. Radiometric isotopes are unstable and do decay; decay is at a constant rate, and therefore can be useful for age-dating different water sources. Additionally, data collected as part of monitoring under the state program (2020 to 2022) and the federal CCR program (2015-2022) were used as described and presented within this report.

In summary, the data collected in this assessment confirms that the uppermost aquifer is not in communication with the CCR unit water, groundwater geochemistry in the uppermost aquifer is reflective of the geogenic natural environmental conditions, and is therefore unaffected by the CCR unit. Each of the multiple lines of evidence presented in this report independently supports this conclusion as discussed below.

1.2 Site Overview and Operational History

The MONPP FAB is located about one mile southwest of the MONPP in Section 16, Township 7 South, Range 9 East at 7955 East Dunbar Road, Monroe, Monroe County, Michigan (Figure 1). The MONPP FAB is bounded by Dunbar Road and Plum Creek to the north and northeast, Interstate 75 to the northwest, a 200-acre peninsula into Lake Erie to the east and southeast, Lake Erie to the south, and a large open field to the southwest (Figure 2).

The property has been used continuously for the operation of the CCR unit since approximately 1975 and is constructed over a natural clay-rich soil base. The MONPP FAB are owned by DTE Electric, and currently receive coal ash from DTE Electric's MONPP. The MONPP FAB is operated in accordance with Michigan Part 115 of the Natural Resources and Environmental Protection Act (NREPA), PA 451 of 1994, as amended, and are licensed as a Coal Ash Surface Impoundment and a Coal Ash Landfill under the current operating license number 9579.

1.3 Geology/Hydrogeology

The geologic and hydrogeologic conditions at the CCR unit have been extensively studied and these studies (including TRC, 2017, Detroit Edison 1995 and Geosyntec 2020), provide specific details on the hydrogeology and geology in the region, and at the MONPP. A brief discussion is provided below.

The CCR unit is located approximately 200 feet southwest of Plum Creek and approximately 250 feet northwest of Lake Erie. The uppermost aquifer consists of saturated limestone of the Bass Islands Group and a 5- to 10-foot thick layer of weathered limestone mixed with clay, sand, and/or gravel just above the limestone interface, both present beneath at least 14 to 34 feet of a contiguous glacially compacted natural clay liner that serves as a natural confining hydraulic barrier isolating the underlying uppermost aquifer (TRC, 2017 and Geosyntec, 2021). The limestone bedrock aquifer is artesian in every location except MW 16-01, where the static water level was approximately 1 to 2 feet below ground surface (ft bgs). Monitoring wells MW-16-01 through MW-16-07 are all screened in the top of the limestone uppermost aquifer, which is up to 350 feet thick in Monroe County.

Potentiometric groundwater elevation data from 2016 through 2022 suggest that there is horizontal flow within the upper aquifer unit generally to the northeast towards Plum Creek (TRC, January 2023). The average hydraulic gradient was 0.004 foot/foot in 2022 (Figure 4).

2.0 Additional Data Collection

The additional groundwater, CCR unit FAB water and surface water sample collection was performed from December 9 to 13, 2022 to provide data to further characterize the uppermost aquifer at the CCR unit. These samples were collected in general accordance with the procedures outlined in the *CCR Groundwater Monitoring and Quality Assurance Project Plan – DTE Electric Company Monroe Power Plant Coal Combustion Residual Fly Ash Basin* (QAPP) (TRC, August 2016; revised March 2017).

2.1 Groundwater Sample Collection

Groundwater samples were collected from the seven monitoring wells within the CCR unit uppermost aquifer monitoring well network (MW-16-01 through MW-16-07) (Figure 2).

2.2 Fly Ash Basin Water Sample Collection

A water sample was collected from the FAB at the discharge point to Lake Erie (called SW-001 for the December 2022 sample) (Figure 2). In addition, water samples were collected from five existing piezometers (PZ-01 through PZ-05) that were installed in late 2020 to collect pore water samples from the CCR within the FAB (Figure 2).

2.3 Surface Water Sample Collection

Surface water samples (P-01 from Plum Creek and LE-01 from Lake Erie) were collected from the approximate locations shown on Figure 3.

The samples were submitted to the laboratories listed below for analysis of the following parameters to support the additional uppermost aquifer characterization:

- Eurofins Environment Testing for analysis of calcium (Ca), magnesium (Mg), sodium (Na), potassium (K), sulfate (SO₄), chloride (CI), HCO₃ and alkalinity (bicarbonate (HCO₃), carbonate (CO_3) and total alkalinity), boron (B) , lithium (Li) and strontium (Sr) ;
- ALS Scandinavia for analysis of δ¹¹B, δ⁸⁷Sr and δ⁷Li;
- Waterloo Environmental Isotope Laboratory for analysis of δ²H and δ¹⁸O; and
- **Miami Tritium Laboratory for analysis of tritium.**

Note: the δ notation is explained in Section 3. The December 2022 water data are summarized in Tables 1 through 3 and the December 2022 laboratory data for these water samples are provided in Appendix A.

3.0 Geochemical and Isotopic Data Analysis

3.1 Geochemistry

In order to provide a comprehensive evaluation of the data collected in December 2022, all of the existing Appendix III and Appendix IV data from groundwater samples collected from 2016 through 2022, as provided in the 2017 to 2022 Annual Reports (TRC, January 2018 through January 2023) were also included in the evaluation. These parameters included boron, calcium, chloride, fluoride, pH, sulfate, total dissolved solids, antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, lead, lithium, mercury, molybdenum, selenium, thallium, and radium 226/228 combined. Additionally, concentrations of magnesium, potassium, sodium, strontium, and total organic carbon (TOC), as well as field measured parameters including oxidation-reduction potential (ORP), dissolved oxygen (DO), specific conductivity (SC), temperature, and turbidity were analyzed/measured and utilized in this evaluation. The December 2022 field data are summarized in Table 1, and data for samples collected from the CCR unit water (2020 to 2022) and groundwater data collected from the uppermost aquifer monitoring wells (December 2022) are summarized in Table 2.

Analyte concentrations were compared to their historical values to verify consistency with past data (when possible). Samples collected from piezometers screened within the CCR unit (from PZ-1 to PZ-5) were compared to groundwater samples collected from the uppermost aquifer (MW-16-01 to MW-16-07). In addition, surface water samples for analysis were collected at Lake Erie (LE-01) and Plum Creek (P-01) to provide analytical data independent of both the CCR unit water or the uppermost aquifer groundwater (Figure 3). This data serves to augment the conceptual site model (CSM) by providing background information of other water types in the area, particularly the source of some of the stable isotopes.

3.1.1 General Chemistry

Data show that the December 2022 sampling results are consistent with historical data, and the results were within typical ranges of previously analyzed samples. The uppermost aquifer groundwater, FAB CCR unit water, and Lake Erie/Plum Creek sample geochemistries are broadly differentiated from each other in virtually every analysis. Figure 5 provides a Piper Diagram which plots the concentrations into groups or facies commonly recognized for comparison of major ions. Lake Erie and Plum Creek surface water samples plot in the magnesium-bicarbonate and mixed-no dominant facies while the uppermost aquifer groundwater is tightly packed at the top of the calcium-sulfate group. The CCR unit water varies in type but generally falls into the mixed-sodium/bicarbonate facies and is distinctively different from the uppermost aquifer groundwater. The uppermost aquifer results match those in the United Stated Geological Survey (USGS) report, Hydrology, Water Quality, and Effects of Drought in Monroe County (Nicholas, 1996).

Sulfate concentrations within the uppermost aquifer groundwater ranged from 1,300 milligrams per liter (mg/L) to 1,500 mg/L while the CCR unit water ranged from 14 mg/L to 560 mg/L (Figure 6). Chloride concentrations overlapped somewhat (uppermost aquifer groundwater 7.6 - 35 mg/L, CCR unit water 27 - 45 mg/L). Boron concentrations in the CCR unit water (2,800 – 13,000 micrograms per liter (µg/L)) were, on average 28 times higher than the uppermost

aquifer groundwater (150 – 430 ug/L) . Barium and molybdenum concentrations in the CCR unit water were an average of two orders of magnitude and three orders of magnitude, respectively, higher than the uppermost aquifer groundwater (Figure 7).

Calcium and magnesium were both considerably more concentrated in the uppermost aquifer groundwater than the CCR unit water (average 3 times and 100 times higher, respectively), but sodium and potassium were more concentrated in the CCR unit water than in the uppermost aquifer groundwater (average 18 times and 26 times, higher respectively). Groundwater in the uppermost aquifer was close to neutral (pH 6.93 - 7.11 standard units (SU)) while the CCR unit water was highly alkaline (pH 10.80 – 12.79 SU), and the uppermost aquifer ORP was low positive (3 – 46.3 millivolts [mV]) while the CCR unit water varied considerably (-45.1 – 129.3 mV). Table 4 below provides a summary of the data, which is discussed more fully in Section $3.1.2...$

Parameter	Units	Aquifer Avg	CCR unit Avg	Lake Erie	Plum Creek
$Na^+ + K^+ + Li^+$	mg/L	12.4	225	15.3	60.8
$Ca^{2+}+Mg^{2+}+Ba^{2+}$	mg/L	520	112	48.3	111
B^{3+}	mg/L	0.27	6.7	< 0.1	< 0.1
$HCO3 + CO32 + SO42 + Cl + F$	mg/L	1,615	634	159	471
pH	SU	7.0	12.0	8.4	7.8
Eh	mV	34.5	55.1	99.1	117

Table 4 - Summary of Water Chemistry Results

3.1.2 Ionic Speciation and Mineral Saturation

Using the measured data, the dominant dissolved species of each measured element was determined. The dominant cationic monovalent species were Na+ and K+ in all the groups. Due to the large pH difference between the uppermost aquifer groundwater and the CCR unit water, dominant species were shifted because of the large quantity of hydroxide ions in the CCR unit water (e.g., bicarbonate to carbonate and boric acid to borate). HCO $_3$, SO₄, Cl⁻, and F⁻ were the dominant anions in all groups, except for the high pH CCR waters, where OH becomes important.

Geochemical parameters for the CCR unit water and the uppermost aquifer groundwater were calculated from the measured data using Geochemist's Workbench® (GW). The average of the chemical parameters for each water are presented below in Table 5.

Table 5 - Calculated Average Geochemical Parameters

Fugacity is a thermodynamic parameter that can be used to differentiate water masses based on their geochemical properties. Fugacity is a measure of the escaping tendency of a gas or volatile substance from a liquid or solid phase, and it is commonly used to describe the behavior of gases and other volatile substances in aqueous environments. A very low fugacity, as observed in each of these waters, means that a gas or volatile substance is not readily escaping from a liquid or solid phase. Both pe and Eh can be used to describe water masses based on their oxidative or reducing potential. The pe and Eh values correspond to relatively oxidizing environments, as it is greater than 0 and indicates that the activity of oxidants is greater than the activity of reductants. In other words, there is a relatively high concentration of electron acceptors (such as oxygen) compared to electron donors (such as ferrous iron) in the system. lonic strength is a measure of the concentration of charged ions (e.g., Na * , Cl * , Mg $^{2+}$, etc.) in a solution. The values determined for both water masses indicates that that the concentration of charged ions in the water is sufficient to contribute to the overall ionic strength of the solution. Chlorinity is a measure of the concentration of chloride ions (CI⁻) in a solution and is often used as a proxy for salinity.

Electrical conductivity is a measure of the water's ability to conduct an electric current and reflects the concentration and mobility of charged ions in a solution. The values observed in both waters is relatively conductive, meaning they contain a relatively high concentration of dissolved ions such as dissolved salts.

Carbonate and non-carbonate hardness are two measures of water hardness that can be used to differentiate water masses based on their composition. Carbonate hardness, also known as temporary hardness, is caused by the presence of dissolved bicarbonate and carbonate ions in the water. These ions are derived from the dissolution of calcium and magnesium carbonates in the rock formations through which the water has passed. Non-carbonate hardness, also known as permanent hardness, is caused by the presence of dissolved calcium and magnesium ions in the water that are not associated with carbonate or bicarbonate ions. This type of hardness is typically caused by the dissolution of calcium and magnesium sulfates or chlorides in the water. The difference in carbonate hardness between the CCR unit water and the uppermost aquifer groundwater indicates that these two water masses have different sources or have been subjected to different geochemical processes. The differences of 150.1 μ g/L (as CaCO₃) carbonate hardness and 1,179 $\mu q/L$ (as CaCO₃) noncarbonate hardness between the CCR unit water and the uppermost aquifer groundwater are relatively large and demonstrates that they have significantly different sources or have undergone different geochemical processes, such as dissolution or precipitation of carbonate minerals.

By comparing the ratio of carbonate hardness to non-carbonate hardness, it is possible to differentiate water masses that have different sources and chemical compositions. For example, water masses that originate from carbonate-rich aquifers or limestone formations are likely to have higher carbonate hardness relative to non-carbonate hardness, while water masses that originate from sulfate-rich formations or are influenced by seawater intrusion are likely to have higher non-carbonate hardness relative to carbonate hardness. The very high ratio (undefined but taken as 279 for descriptive purposes here) in the context of the CCR unit water, high carbonate hardness can come from a variety of sources. Coal and coal combustion residuals typically contain significant amounts of calcium and magnesium carbonates. When these materials are exposed to water, they can dissolve, contributing to high levels of carbonate hardness in the water. Conversely, the ratio of carbonate and noncarbonate hardness in the uppermost aquifer groundwater is very low (0.1) indicating that, although there is limestone in the uppermost aquifer, the noncarbonate hardness is higher (likely related to the high sulfate content) than in the CCR unit water.

Mineral saturation indices of 102 mineral phases were also calculated using GW. Log(Q/K) mineral saturation data is typically used to determine the saturation state of minerals. Q represents the activity of a particular mineral species, while K represents the equilibrium constant for the mineral reaction in question. The logarithm of the ratio of Q to K is taken to calculate log(Q/K), which provides an indication of the saturation state of the mineral. If log(Q/K) is positive, it indicates that the mineral is oversaturated and may precipitate out of solution. If log(Q/K) is negative, it indicates that the mineral is undersaturated and may dissolve into solution. If $log(Q/K)$ is zero, it indicates that the mineral is in a state of equilibrium. The saturation results are provided in Table 6.

In general, based on the calculations presented in Table 6, minerals with boron, barium, chloride, lithium, potassium, and sodium were slightly undersaturated and minerals with calcium and magnesium were near saturation in both waters. Oxides were oversaturated or near equilibrium in all samples. Carbonates were at equilibrium in the uppermost aquifer groundwater, but were oversaturated in the CCR unit water. Sulfate minerals were near saturation in the uppermost aquifer groundwater, but were undersaturated in the CCR water. This is also presented in Figure 6, which provides the concentration of calcium plus magnesium as a function of concentration of dissolved sulfate as shown in Figure 32 of the Monroe County USGS report (Nicholas, 1996). The uppermost aquifer groundwater results plot below the gypsum dissolution line just as the report notes for other groundwater samples in the area.

Based on these results, boron, barium, chloride, lithium, potassium, and sodium are likely slowly dissolving out of the natural uppermost aquifer materials into the uppermost aquifer groundwater. This is observed in the data. Boron, barium, lithium, and potassium concentrations are slightly higher in the downgradient wells than the cross gradient and upgradient monitoring wells. Chloride and sodium do not increase in concentration downgradient, but this is expected since they are unlikely to be available in the aquifer material to contribute to the groundwater. Although the carbonates are oversaturated in the CCR unit water, they may not be precipitating due to the pH. In alkaline conditions, carbonates can dissolve due to the formation of bicarbonate ions in solution. Note that calcium plus magnesium concentration as a function of the concentration of dissolved bicarbonate is provided in Figure 10 (discussed below) as shown in Figure 31 of the Monroe County USGS report (Nicholas, 1996). The uppermost aquifer groundwater plots above the carbonate dissolution line identically to the USGS report data, indicating that the carbonate chemistry in the uppermost aquifer groundwater is the same as those sampled across Monroe County.

3.2 Stable Isotopes

While concentration, speciation, and saturation data provide useful geochemical information to characterize water types, and can be particularly useful to determine if one body of water is in hydraulic connection with another, stable isotope analyses can provide unique "signatures" to differentiate and source waters. In order to build on the information presented above, several isotopic evaluations were also performed. For this study, lithium, boron strontium, hydrogen and oxygen isotopic data were used to determine the sources of various analytes and to build a CSM of the hydrogeologic and geochemical conditions. The stable isotope water data collected in December 2022 is summarized in Table 3.

Isotopes are commonly expressed with the delta notation (δ). The delta notation is a common way to express the relative abundance of isotopes in a sample, relative to a standard reference material. It is used to express the differences in the isotopic composition of a sample relative to the reference material, in parts per thousand (per mil or ‰). The delta notation is defined as:

$$
\delta = \left(\frac{R_{Sample}}{R_{Standard}} - 1\right)1,000
$$

Where R is typically the rare isotope abundance divided by the abundant isotope abundance.

3.2.1 Lithium (δ7Li) and Boron (δ11B)

Lithium (δ⁷Li) and boron (δ¹¹B) isotopes can be used to distinguish CCR water from background because the isotopic composition of lithium and boron in CCR is typically distinct from the composition in natural sources, such as rocks and sediments. The isotopic composition of lithium and boron in CCR is different from that of natural sources because coal has a unique isotopic signature due to its geological origins and the processes involved in its formation.

The isotopic composition of lithium can change during coal formation due to several factors, including the geological origins of the coal, the depositional environment, and the processes involved in coal formation (Owen, 2015). Lithium has two stable isotopes, lithium-6 and lithium-7, and their relative abundance can be expressed as the delta value (δ⁷Li) relative to a standard reference material (LSVEC NIST 8545 RM). The δ^7 Li value can be used to track changes in the isotopic composition of lithium during coal formation (Teichert, 2022). The δ⁷Li value of coal generally increases with increasing rank, or maturity, of the coal. This is because as coal is buried and subjected to increasing pressure and temperature, it undergoes a process called devolatilization, in which the volatile components of the coal, including lithium, are released. The released lithium preferentially enriches the remaining coal in the lighter isotope, lithium-6, leading to enrichment in the 7 Li in the coal. The exact extent to which the δ^7 Li value changes during coal formation can also depend on other factors, such as the depositional environment and the source of the organic matter that forms the coal. For example, coal formed from organic matter derived from plants that preferentially take up lithium-6 during growth may have a higher δ⁷Li value than coal formed from marine organisms that have a higher δ⁷Li value (Schlesinger, 2021).

Boron is a trace element that can be found in coal in varying amounts. The isotopic composition of boron in coal can change during coal formation, but the specifics of this process depend on several factors, including the source of boron, the depositional environment, and the conditions during coalification (Williams, 2004). In general, boron is derived from several sources during coal formation, including volcanic activity, seawater, and groundwater. Boron has two stable isotopes, boron-10 and boron-11, and their relative abundance can be expressed as the delta value ($δ¹¹B$) relative to a standard reference material (NIST SRM 951 RM). The isotopic composition of boron in these sources can vary, with different isotopic ratios of boron-10 to boron-11. During coal formation, boron can be incorporated into organic matter or minerals in the coal, and the isotopic composition of boron can be affected by processes such as adsorption, diffusion, and precipitation. For example, boron may be adsorbed onto clay minerals or organic matter in the coal, leading to a shift in the isotopic composition of boron towards the composition of the adsorbent (Williams, 2004). The depositional environment can also play a role in determining the isotopic composition of boron in coal. In marine environments, boron may be more enriched in boron-11 due to the fractionation of boron isotopes during seawater evaporation (Xiao, 2007). In freshwater environments, boron isotopes may be more fractionated due to differences in boron uptake by plants (Xiao, 2022).

For these reasons, the δ^7 Li and δ^{11} B values in water can provide information about the source and transport of CCR and CCR affected water. The unique isotopic composition of lithium and boron in CCRs can be used as a tracer. Therefore, this additional uppermost aquifer

characterization utilized the measurement of δ⁷Li and δ¹¹B values in the CCR unit water and the uppermost aquifer groundwater to determine if the unique CCR unit isotopic composition is observed in the uppermost aquifer groundwater. In order to make this effort even more robust, surface water samples were collected from the nearby Lake Erie and Plum Creek upgradient from the CCR unit (Figure 3) in order to determine their δ⁷Li and δ¹¹B values.

The δ⁷Li and δ¹¹B of the CCR unit water ranged from 7.78 to 24.25 per mil (‰) and -17.58 to -3.0 ‰, respectively, and the uppermost aquifer groundwater ranged from 11.09 to 14.23 ‰ and -0.36 to 5.38 ‰, respectively. As observed in Figure 8, the CCR unit water and the uppermost aquifer groundwater plot in two distinct groups that are statistically different ($p = 0.0052$ for a one-sided t-test at 95% confidence). The Lake Erie and Plum Creek surface water each plot approximately 5 ‰ heavier than the uppermost aquifer groundwater. The average $\delta^{11}B$ of the CCR unit water was 13.5 ‰ and 18.5 ‰ $\delta^{11}B$ lighter than the uppermost aquifer groundwater and Lake Erie/Plum Creek surface water samples, respectively. The CCR unit water lithium and boron isotopic compositions fall within ranges commonly observed of fractionated CCR material (Davidson, 1993; Spivak-Birndorf, 2006; Harkness 2015; Teichert, 2022). The δ⁷Li and δ 11 B vales of the uppermost aquifer groundwater samples and the surface water samples from Lake Erie and Plum Creek are compositionally distinct from the CCR values (Ruhl, 2014; Owen, 2015) and fall within ranges commonly observed in the natural environment (Gonfiantini, 2006). The statistical results are provided in Appendix B.

3.2.2 Strontium (87Sr/86Sr)

Similar to lithium and boron, the isotopic composition of strontium can be used to identify coal combustion residuals because coal and the minerals associated with it have a distinct strontium isotope signature that is different from other geologic materials (Brandt, 2018). During the coal combustion process, the strontium isotopic composition of the coal and any associated minerals is altered. CCR, including fly ash and bottom ash, can therefore be identified by analyzing their strontium isotopic composition and comparing it to the strontium isotopic composition of nearby liquids and solids that have not been affected by coal combustion (Hurst, 1981). The isotopic composition of strontium can be determined as a ratio of two of the stable isotopes, Sr-86, Sr-87, expressed as the ratio ⁸⁷Sr/⁸⁶Sr relative to a standard reference material (NIST SRM 987).

Strontium is a trace element that occurs naturally in coal-forming environments, and its isotopic composition can be affected by the source of the sedimentary materials, as well as by diagenetic processes. During coal formation, organic matter is buried and subjected to heat and pressure, which causes it to transform into coal. This process can lead to the release of fluids from the sedimentary rocks surrounding the coal seam, which can affect the isotopic composition of strontium in the coal (Spivak‐Birndorf, 2012). In particular, the fluids may contain different concentrations of strontium isotopes compared to the original sedimentary rocks, which can lead to changes in the isotopic composition of strontium in the coal.

In addition, strontium can be incorporated into the organic matter itself during coal formation, which can also alter its isotopic composition. The extent to which strontium is incorporated into the organic matter is dependent on several factors, including the original concentration of strontium in the sedimentary materials and the conditions during coal formation. The isotopic

composition of strontium in coal can be influenced by both the source materials and the processes that occur during coal formation (Korte, 2003). This makes it a useful tool for determining if CCR impacted waters are in hydraulic connection with natural water.

Therefore, this additional uppermost aquifer characterization utilized the measurement of 87 Sr/ 86 Sr values in the CCR unit water and the uppermost aquifer groundwater to determine if the unique CCR unit isotopic composition is observed in the groundwater. Surface water samples were collected from the nearby Lake Erie and Plum Creek (Figure 3) in order to determine their ⁸⁷Sr/86Sr values.

The ⁸⁷Sr/⁸⁶Sr ratios of the CCR unit water ranged from 0.709300 to 0.711936 while the uppermost aquifer groundwater ranged from 0.708454 to 0.708488. The average 87 Sr/ 86 Sr ratio of the CCR unit water was approximately 0.002 higher than the uppermost aquifer groundwater, which although seeming small, amounts to 68 times the internal range of all uppermost aquifer groundwater sample results. The Lake Erie and Plum creek strontium ratios were 0.708391 and 0.708543, respectively, which is essentially identical to the uppermost aquifer groundwater. As observed in Figure 9, the CCR unit water and the aquifer water plot in two distinct groups that are statistically different ($p = 0.00324$ for a one-sided t-test at 95% confidence). The statistical results are provided in Appendix B. The 87 Sr/ 86 Sr ratios of the CCR unit water are within published ranges of CCR leachate (Ruhl, 2014; Wang, 2020), and the uppermost aquifer groundwater samples and Lake Erie and Plum Creek sample composition fit with values observed in natural waters (Shahand, 2009).

3.2.3 Hydrogen (δ2H) and Oxygen (δ18O)

Hydrogen and oxygen isotopes are commonly used in environmental studies to trace the sources and fate of water molecules. The use of hydrogen and oxygen isotopes in water can provide valuable insights into the impacts of CCRs on water quality. In the case of CCR impacts in water, hydrogen and oxygen isotopes can be used to determine the source of water in ponds and if those molecules have migrated to natural waters (Liu, 2006). The isotopic composition of water molecules within these CCR water bodies can be compared to the isotopic composition of nearby uncontaminated water bodies. The isotopic composition of hydrogen and oxygen in water molecules is expressed as δ 2 H and δ 18 O, respectively, and is measured in ‰ relative to a standard (Vienna Standard Mean Ocean Water [VMOW]). The isotopic signature of CCRs can vary depending on the source of coal, combustion conditions, and post-combustion processing (Huang, 2017).

Additionally, precipitation can have a significant effect on hydrogen and oxygen isotopes in groundwater. This is because the isotopic composition of precipitation varies in different regions (global and local meteoric water lines) due to variations in temperature, altitude, and atmospheric circulation patterns (Jouzel, 1984). When precipitation falls to the ground, it can either infiltrate into the soil and recharge the groundwater, or it can run off and enter streams or ponds. In the case of infiltration, the isotopic composition of the precipitation is generally preserved as it moves through the soil and into the groundwater. This means that the δ²H and δ^{18} O values of the groundwater will be similar to those of the precipitation that recharged it. The degree to which precipitation affects the isotopic composition of groundwater can vary

depending on factors such as the depth and age of the groundwater, the nature of the subsurface materials, and the rate of recharge. Therefore, δ^2 H and δ^{18} O values in groundwater can be used to trace the origin and movement of water in aquifers and to Identify if CCR has impacted water.

For these reasons this additional uppermost aquifer characterization utilized the measurement of δ²H and δ¹⁸O values in the CCR unit water and the uppermost aquifer groundwater to determine if the unique CCR unit isotopic composition is observed in the uppermost aquifer groundwater. Surface water samples were collected from the nearby Lake Erie and Plum Creek where shown on Figure 3 in order to determine their δ^2 H and δ^{18} O compositions.

The δ 2 H and δ 18 O compositions of the CCR unit water ranged from -51.38 to -48.02 ‰ and -7.51 to -6.95 ‰, respectively, and the uppermost aquifer groundwater compositions ranged from -55.98 to -50.26 ‰ and -9.00 to -7.62 ‰, respectively. The uppermost aquifer groundwater samples all plot above the global meteoric water line $^{\text{\tiny{\text{1}}}}$, and the CCR unit water samples straddle the line (Craig, 1961). The Lake Erie and Plum creek δ 2 H and δ 18 O compositions were -49.86/-6.88 ‰ and -53.18/-7.66 ‰, respectively. The CCR unit water δ²H, on average was 2 ‰ lighter than the uppermost aquifer groundwater, and the δ¹⁸O was 0.63 ‰ δ¹⁸O lighter. As observed in Figure 10, the CCR unit water and the uppermost aquifer groundwater plot in two distinct groups that are statistically different (hydrogen $p = 0.02759$ and oxygen $p = 0.004214$ for one-sided ttests at 95% confidence). The statistical results are provided in Appendix B.

3.3 Age Dating with Tritium Isotopes

The use of the isotope tritium to age date water is a well-established science and it has been successfully used to age date water sources for decades (Schlosser, 1988). Tritium (${}^{3}\textsf{H}$) is a radioactive isotope of hydrogen, that decays at a constant rate to Helium-3 (3 He*) with a half-life of about 12.3 years. It is a naturally occurring radioactive isotope, but also can be produced by human activities such as nuclear weapons testing. Tritium can be used to determine the age of groundwater because it can serve as a tracer of the time since the water was last in contact with the atmosphere (Telloli, 2022). Tritium is introduced into the atmosphere through nuclear weapons testing and naturally occurring cosmic radiation. It then becomes incorporated into precipitation and infiltrates into the ground, where it is taken up by plants or recharges groundwater. There are no subsurface reactions that generate tritium. Because tritium has a relatively short half-life, its concentration in precipitation, surface water and groundwater can be used to determine the age of the water (Dove, 2021).

When groundwater is recharged by precipitation that contains tritium, the concentration of tritium in the groundwater will be proportional to the age of the water since it was last in contact with the atmosphere. For example, if the concentration of tritium in the groundwater is high, it indicates that the water was recharged relatively recently, whereas if the concentration of tritium is low or undetectable, it indicates that the water is older. This information is important for understanding the hydrology of aquifers and for managing and protecting groundwater

¹ The global meteoric water line describes the global annual average relationship between hydrogen and oxygen isotope ratios (deuterium and oxygen 18) in natural meteoric waters. It is widely used to track water masses in environmental geochemistry and hydrogeology (Craig, 1961).

resources.

The groundwater age can be estimated using the concentration of tritium in the water and the known rate of decay of tritium. The basic equation for calculating tritium age is:

$$
Age = ln\left(\frac{A_{A_0}}{\lambda}\right)
$$

Where A is the measured tritium in the water sample in tritium units (TU), A_0 is the tritium concentration in precipitation, and λ is the decay constant which is 0.693 divided by the half-life of 12.3 years. The tritium age calculated from this equation represents the time since the water was last in contact with the atmosphere. However, it is important to note that the tritium age reflects the time since the water entered the subsurface but may not necessarily reflect the time since the water was first recharged into the aquifer. This is because the water may have spent some time in the unsaturated zone (i.e., the soil and rock above the water table) before entering the aquifer, and this time is not accounted for in the tritium age calculation.

This additional uppermost aquifer characterization utilized tritium to determine if water from the CCR unit was impacting the uppermost aquifer groundwater . This was accomplished by collecting water samples from within the CCR unit water, uppermost aquifer groundwater samples, and surface water samples from Lake Erie and Plum Creek upgradient of the unit. The tritium water data collected in December 2022 is summarized in Table 3. The Lake Erie and Plum Creek measured tritium values were 23.8 and 20.0 TU while the CCR unit water (collected from piezometers within the unit) ranged from 5.92 to 10.8 TU. The uppermost aquifer groundwater sample collected upgradient of the CCR Unit (MW-16-04) tritium value was 3.41 TU and all the other uppermost aquifer groundwater samples were below the detection limit of 0.1 TU.

Using the equation above, as a conservative approach the Lake Erie sample can be used to represent A_0 . Using this estimate, the water in Plum Creek would be 2.7 years old and the CCR Unit water ranges from 13 to 17 years old (Figure 11). The MW-16-04 upgradient uppermost aquifer groundwater sample would therefore be approximately 20 years old from when it was recharged from further upgradient to the southwest and groundwater at all the other uppermost aquifer wells, including all the down hydraulic gradient wells were each last recharged at least 95 years ago (older than when the FAB entered service in ~1975 about 48 years ago; Figure 11). Therefore, if the CCR unit water were traveling vertically through the confining layer it would be observed in the tritium data at MW-16-01, MW-16-06 and MW-16-07, the downgradient uppermost aquifer groundwater is not in hydraulic communication with the CCR unit water and the uppermost aquifer has not been affected.

It is important to note that diffusion may affect tritium concentrations. Diffusion can affect tritium values in groundwater by altering the concentration gradient of tritium in the subsurface. Diffusion is the process by which molecules move from areas of high concentration to areas of low concentration due to random thermal motion. In the subsurface, diffusion can cause tritium to move from areas of higher concentration to areas of lower concentration, resulting in a

decrease in tritium concentration over time. In groundwater systems, tritium is introduced into the subsurface through infiltration of tritium-containing precipitation. The tritium concentration in the groundwater is initially highest near the recharge zone, and decreases as the water flows through the subsurface. As the tritium moves through the subsurface, it can be affected by diffusion, which can cause it to move from areas of higher concentration to areas of lower concentration.

The rate of diffusion of tritium in groundwater is therefore primarily dependent on the hydraulic conductivity of the subsurface materials and the concentration gradient of tritium. It is important to consider the effects of diffusion when interpreting tritium data in groundwater studies, as it can impact the accuracy of age estimates and the interpretation of the hydrogeological processes in the subsurface.

The control of diffusion in a groundwater system can be demonstrated by calculating the Peclet number. The Peclet number is a dimensionless number that describes the relative importance of advection and diffusion in a fluid system. In groundwater, the Peclet number can be calculated using the following equation:

$$
Pe = \frac{(Lv)}{D}
$$

where Pe is the Peclet number, L is the characteristic length scale of the system (e.g. the distance between the source and the monitoring well), v is the groundwater velocity, and D is the molecular diffusion coefficient. A Peclet number greater than 1 indicates that advection is dominant, while a Peclet number less than 1 indicates that diffusion is dominant. Given the distance (150 ft) to the monitoring wells and a seepage velocity of 73 ft/year, at standard temperature and pressure the Peclet number for tritium is greater than 10. Therefore, diffusion cannot be significantly influencing the measured tritium concentrations in the monitoring wells.

4.0 Statistical Analysis

TRC performed statistical evaluations of the data collected as part of this study to evaluate additional lines of evidence to support aquifer characterization. In order to compare the different water groups (CCR unit vs uppermost aquifer water) to each other in a holistic manner, principal component analysis (PCA) and linear discriminant analysis (LDA) were selected as appropriate data analysis tools. PCA and LDA are statistical techniques that are used for large data sets containing a high number of dimensions/features per observation allowing for visualization of multidimensional data. PCA is a well-established statistical method for evaluating data and has been around for over 100 years. Likewise, LDA analysis is a statistical method that has been used to evaluate large data sets since the 1930s. Geochemists and groundwater statisticians use these tools because they are effective to evaluate large data sets that are typical for sites that have numerous wells and numerous parameters tested, which result in potentially large data dimensionality.

The data used for this analysis consisted of the uppermost aquifer monitoring well network collected from August 2016 through December 2022, FAB water samples collected from April 2020 through December 2022, and CCR FAB piezometer CCR pore water samples collected from December 2020 through December 2022. Based on the recommendations from the Electric Power Research Institute (EPRI) New Techniques in Alternative Source Demonstrations (EPRI, October 2022) guidance and the minimum requirements of LDA, only the Appendix III analytes (boron, calcium, chloride, fluoride, sulfate, pH, and total dissolved solids (TDS)) were retained for analysis. Furthermore, it was found that TDS was not consistently reported in all the CCR unit water data and therefore TDS was removed from the analyte suite leaving boron, calcium, chloride, fluoride, sulfate, and pH. Non-detects were multiplied by 0.5 as this has been found to produce the most accurate results for PCA (Farnham et al, 2002).

4.1 Principal Component Analysis

The goal of the principal component analysis is to reduce the dimensionality of the data while preserving the variation contained within the dataset. To reduce the dimensionality, the data is linearly transformed from *n* dimensions to *n* linearly transformed dimensions or principal components (PCs). These resulting PCs are ordered in terms of which components contain the most variation of the original dataset from PC1 having the most variation to PC*n* having the least variation. The amount of variation each PC contains can be found in the eigenvalue of the PC, with higher eigenvalues corresponding to a higher percentage of the original dataset variation explained. These eigenvalues can be plotted to compare PCs to each other on what's known as a scree plot. Typically, the first two PCs are retained for further analysis, but any PCs with eigenvalues near or above 1 can be beneficial for analysis. The results of the PCA are commonly presented on a plot that contains both the loading scores of the PCs and the original data points projected using the PCs in what is known as a biplot. The loading scores indicate how much each analyte affects the corresponding PC and the projected points can be used to find clusters of similar data within the original dataset.

Figure 12, called a Scree plot, shows the eigenvalues for the six PCs created from the original data. PC1 and PC2 are near or above 1 and are therefore retained for further analysis. Figure 13 (Biplot) contains two layers of data, the blue arrows centered around the origin represent the

loading scores for the PCs and the colored points represented the projected data. As can be seen in the percentages provided for each axis, PC1 contains 62.18% of the variation of the original dataset, meaning that most of the variation of the data can be seen in the horizontal axis. PC2 contains 16.16% of the variation of the original dataset. Together PC1 and PC2 account for 78.34% of the variation of the original data, showing that the data has been reduced from six dimensions to two dimensions while only losing 21.66% of the variation. There is no established criteria for how much variation is required to be explained by the PCs but at least 70% is a common target which the first two PCs meet (Jolliffe and Cadima 2016). Because the data are standardized before PCA is performed, the loading scores are multiplied to the standardized score of each analyte. As can be seen on Figure 13 (Biplot) by the arrows, sulfate and calcium point almost directly left, meaning that higher than average concentrations of sulfate or calcium in a sample would project that sample further to the left on the biplot. Conversely, if a sample has lower than average concentrations of sulfate or calcium it would be projected more to the right. From the loading scores we can see that PC1 is strongly influenced by sulfate, calcium, pH, boron, and chloride and weakly influenced by fluoride. PC2 is strongly influenced by fluoride and chloride and weakly influenced by boron, calcium, and sulfate, PC2 is not significantly influenced by pH. The standardized data points are projected using the loading scores and are displayed as the color-coded points on the biplot. 95% confidence intervals were calculated to demonstrate the separation between the groups. As can be seen on Figure 13, the uppermost aquifer groundwater is significantly separated from the CCR FAB piezometer and basin water groups, showing that the analytical composition of the three groups are all distinctively different from each other.

4.2 Linear Discriminant Analysis

In addition to PCA, linear discriminant analysis (LDA) was performed to further provide evidence of separation between the groups. LDA is similar to PCA in that it performs dimensionality reduction on the data; however, instead of preserving the most variation of the dataset, it attempts to separate the provided groups based on the distance between them and then predicts the group membership of each data point. Because LDA is a classification method, we can directly measure the separability of the groups based on the performance of the model.

Figure 14 (LDA Origin) shows the eigenvalues, canonical variables which are analogous to principal components in PCA, the prediction matrix, and the error rate of the LDA. Because LDA is maximizing the distance between the groups, the canonical variables can explain all of the variation between groups in two variables instead of the six PCA produced. Similar to PCA, when we observe the standardized canonical coefficients table, we can see that CV1 is strongly influenced by boron, calcium, chloride, sulfate, and pH while only being weakly influenced by fluoride. CV2 is strongly influenced by calcium, sulfate, and pH and weakly influenced by boron, chloride, and fluoride. Because CV2 accounts for a low amount of variance, only CV1 was retained for further analysis.

The classification count table shows the predicted classification of each point in the columns while the actual classification are the rows. Where the predicted class column intersects the matching actual class row represents the correct classification, where the prediction class column doesn't match the actual class row represents a misclassification. The LDA model only

classified the points into the correct classes, demonstrating that the groups are separate from each other, this can also be seen in the Error Rate table that the total error rate is 0%.

Figure 15 (LDA Density of LDA Scores) visually represents where each point is projected to using CV1. Each subplot contains samples of only one class while the colors represent the model's prediction. As can be seen, the model perfectly separated the groups and there is significant distance between all of them showing that the units are distinct from each other. Additionally, an analysis of variance (ANOVA) was performed on the projected data that demonstrates a statistically significant difference between the three groups, the output of this analysis is presented in Figure 16 (LDA ANOVA). As can be seen in the figure, at the 95% confidence level the population means are significantly different between the uppermost aquifer groundwater and CCR FAB piezometer and basin water groups.

4.3 Time-Series and Background

To demonstrate analyte concentration consistency over time and natural variability between the uppermost aquifer wells, Figure 17 is included. The time series for the Appendix III analytes show that over the past six years of monitoring there have been no significant trends and the concentrations are relatively stable; further demonstrating that the uppermost aquifer groundwater is not being affected by CCR from the FAB. In addition to the relative stability of the analytes over time, it can be observed that there exists natural variability in concentrations between monitoring wells across the uppermost aquifer groundwater. Most notably in the graphs for chloride, fluoride, and boron, there is a clear distinction between the groundwater concentrations within the uppermost aquifer wells that remains relatively consistent over time.

5.0 Findings and Conclusions

The data analyzed in this assessment demonstrate that the CCR unit water is not in hydraulic communication with the uppermost aquifer and therefore has not impacted the uppermost aquifer groundwater. Each of the individual analyzes provides a line of evidence in support of this conclusion.

5.1 Geochemistry

The geochemistry data provides four distinct lines of evidence that the uppermost aquifer and the CCR unit are not in communication. The first is the distribution of mass or concentration of individual analytes in the three water groups (uppermost aquifer groundwater, Lake Erie/Plum Creek upgradient surface water, and CCR unit water). The second is the geochemical condition of each water group, the third is the geochemical similarity of the uppermost aquifer groundwater and the extensive USGS study of the groundwater across Monroe County, and the fourth are calculated environmental conditions calculated from the first two lines of evidence. From a simple perspective it can be seen that the concentrations of individual analytes in the CCR unit water are very different than within the uppermost aquifer groundwater. These differences are not minor. For example, the Ba^{2+} is up to two orders of magnitude more concentrated in CCR unit water than in the underlying groundwater. Na⁺ and $K⁺$ are 18 and 26 times more concentrated in the CCR unit water. Sulfate is almost nine times more concentrated in the uppermost aquifer groundwater than the CCR unit water.

Indeed, these differences are typically statistically significant to a 95% confidence interval. When two water masses become hydraulically connected, they tend to become more like each other chemically and physically. Geochemical conditions in the CCR unit water are very different from the uppermost aquifer groundwater. The pH of the CCR unit water pH is approximately 12 SU, but the uppermost aquifer groundwater is only approximately pH 7 SU. This means that there are approximately 100,000 times as many hydroxide ions in the CCR unit water than in the underlying uppermost aquifer groundwater. If the CCR unit water and uppermost aquifer groundwater were connected, the pH would be much closer.

The third line of evidence is that the uppermost aquifer groundwater is essentially identical to the groundwater in nearby wells on other properties. The USGS published an exhaustive description of the groundwater geochemical conditions across Monroe County (Nicholas, 1996). The groundwater data collected as part of this assessment, particularly carbonate and sulfate geochemistry, fit well with the USGS data.

The fourth line of calculated geochemical evidence adds weight to the first three. The water geochemistry demonstrates that the uppermost aquifer groundwater and the CCR unit water are not in communication, the existing concentrations of Appendix III and IV analytes in groundwater are geogenic and the uppermost aquifer has not been affected.

5.2 Stable Isotopes

Similar to the multiple lines of evidence described in the preceding section, the stable isotope results reinforce the conclusions described above. The stable isotope analyses provide five distinct lines of evidence (δ⁷Li, δ¹¹B, ⁸⁷Sr/⁸⁶Sr, δ²H, and δ¹⁸O) which unequivocally show that the

lithium, boron, strontium, hydrogen, and oxygen in the uppermost aquifer groundwater does not come from nor is it in communication with the CCR unit water. Not only do the compositions of each of these species fall within well-known natural ranges in the uppermost aquifer groundwater, but each is also statistically different than the corresponding composition in the CCR unit water at 95% confidence intervals. Therefore, the stable isotopes demonstrate that the uppermost aquifer groundwater and the CCR unit water are not in communication and the uppermost aquifer has not been affected.

5.3 Age Dating with Tritium Isotopes

Each of the previously discussed lines of evidence develops different aspects of the CSM. Similar to puzzle pieces, they elucidate different aspects of the hydrogeologic system. The tritium data, likewise reinforces the concept that the uppermost aquifer groundwater is not in communication with the CCR unit. Tritium has a half-life of 12.3 years, and the reporting limit is 0.1 TU. Therefore, groundwater ages up to 95 years in age from recharge should be observable. If a significant amount of CCR-impacted water were entering the groundwater, we should see an impact on the tritium concentration.

The thickness of the contiguous silty clay confining layer is 14 to 34 ft., and three of the monitoring wells (MW-16-01, MW-16-06 and MW-16-07) located immediately downgradient of the CCR unit did not have tritium detected above its laboratory detection limit (0.1 TU). Therefore, the groundwater within these down hydraulic gradient wells were each last recharged at least 95 years ago (older than when the FAB entered service in 1975 about 48 years ago). The lateral groundwater flow rate within the uppermost aquifer is approximately 73 ft/yr. Therefore, if the CCR unit water were traveling vertically through the confining layer it would be observed in the tritium data at MW-16-01, MW-16-06 and MW-16-07, the downgradient uppermost aquifer groundwater is not in hydraulic communication with the CCR unit water and the uppermost aquifer has not been affected.

5.4 Statistical Analysis

PCA was performed on MONPP FAB samples for App III analytes to compare the aquifer water to the CCR unit water in a holistic manner. The PCA was successful in separating the different units into clearly distinct groupings with no overlap at the 95% confidence level, demonstrating that the uppermost aquifer groundwater and the CCR unit water are not in communication and the uppermost aquifer has not been affected.

LDA was performed to further provide evidence that the units are not in communication with each other. LDA is similar to PCA in that they are both dimensionality reduction techniques, but LDA attempts to separate the groups while PCA simply attempts to preserve the variance within the dataset. The model created by the LDA had perfect accuracy and was able to completely separate the groups from each other with a large distance between them. To further provide evidence that the separation is strong, an ANOVA was performed on the data transformed by the LDA. ANOVA compares groups of data to each other to determine if it is statistically probably for the data to be from the same population or different populations. The results of the ANOVA showed that at the 95% confidence level, the units are distinct from each other

demonstrating that the uppermost aquifer groundwater, and the CCR unit water are not in communication and the uppermost aquifer has not been affected.

5.5 Final Assessment

In conclusion, the data collected in this assessment confirms that the uppermost aquifer is not in hydraulic communication with the CCR unit water. This conclusion is supported by each of the multiple lines of evidence presented in this report:

- The geochemical composition of the uppermost aquifer groundwater is independent of and statistically distinct from the CCR unit water;
- The geochemical composition of the uppermost aquifer groundwater is the same as regional groundwater, as published in USGS reports, demonstrating that the uppermost aquifer groundwater is unaffected by the CCR unit water;
- **The source of lithium, boron, strontium, hydrogen, and oxygen in the uppermost aquifer** groundwater is from upgradient groundwater and, as demonstrated by the stable isotope data is distinct from the CCR unit water; and
- Age dating with tritium validates that the uppermost aquifer groundwater is not hydraulically connected to the CCR unit.

These multiple lines of evidence come together in an additive fashion to further validate the CSM established in the ALD and previous studies, which holds that the contiguous glacially compacted natural clay-rich liner system serves as a natural confining hydraulic barrier isolating the underlying uppermost aquifer from the CCR unit and the uppermost aquifer groundwater is unaffected by the CCR unit water.

6.0 References

Brandt, J. E., Lauer, N. E., Vengosh, A., Bernhardt, E. S., & Di Giulio, R. T. (2018). Strontium isotope ratios in fish otoliths as biogenic tracers of coal combustion residual inputs to freshwater ecosystems. Environmental Science & Technology Letters, 5(12), 718-723.

Craig, H. (1961). Isotopic variations in meteoric waters. Science, 133(3465), 1702-1703.

- Davidson, G. R., & Bassett, R. L. (1993). Application of boron isotopes for identifying contaminants such as fly ash leachate in groundwater. Environmental science & technology, 27(1), 172-176.
- Dove, A., Backus, S. M., & King-Sharp, K. (2021). Tritium in Laurentian Great Lakes surface waters. Journal of Great Lakes Research, 47(5), 1458-1463.
- Detroit Edison, Design Engineering, Power Generation Organization. March 1995. Effectiveness of the Underlying Clay Soil as a Natural Barrier On-Site, Ash Disposal Basin, Monroe Power Plant.
- Electric Power Research Institute (EPRI) (October 2022). New Techniques in Alternative Source Demonstrations., EPRI, Palo Alto, CA: 2022 3002023683
- Farnham, I. M., Singh, A. K., Stetzenbach, K. J., & Johannesson, K. H. (2002). Treatment of nondetects in multivariate analysis of groundwater geochemistry data. Chemometrics and Intelligent Laboratory Systems, 60(1-2), 265–281.
- Geosyntec Consultants (Geosyntec). November 2021. Preliminary Alternative Liner Demonstration Fly Ash Basin Monroe Power Plant, DTE Electric Company Monroe Power Plant Fly Ash Basin and vertical Extension Landfill Coal Combustion Residuals Unit, 7955 East Dunbar Road, Monroe, Michigan.
- Gonfiantini, R., & Pennisi, M. (2006). The behaviour of boron isotopes in natural waters and in water–rock interactions. Journal of Geochemical Exploration, 88(1-3), 114-117.
- Hurst, R. W., & Davis, T. E. (1981). Strontium isotopes as tracers of airborne fly ash from coalfired power plants. Environmental Geology, 3(6), 363-367.
- Huang, X., Wang, G., Liang, X., Cui, L., Ma, L., & Xu, Q. (2017). Hydrochemical and stable isotope (δD and δ18O) characteristics of groundwater and hydrogeochemical processes in the Ningtiaota Coalfield, Northwest China. Mine Water and the Environment, 1(37), 119- 136.
- Jolliffe, I. T., & Cadima, J. (2016). Principal component analysis: a review and recent developments. Philosophical transactions. Series A, Mathematical, physical, and engineering sciences, 374(2065), 20150202.

- Jouzel, J., & Merlivat, L. (1984). Deuterium and oxygen 18 in precipitation: Modeling of the isotopic effects during snow formation. Journal of Geophysical Research: Atmospheres, 89(D7), 11749-11757.
- Korte, C., Kozur, H. W., Bruckschen, P., & Veizer, J. (2003). Strontium isotope evolution of Late Permian and Triassic seawater. Geochimica et Cosmochimica Acta, 67(1), 47-62.
- Liu, C. Q., Li, S. L., Lang, Y. C., & Xiao, H. Y. (2006). Using δ15N-and δ18O-values to identify nitrate sources in karst ground water, Guiyang, Southwest China. Environmental science & technology, 40(22), 6928-6933.
- Owen, D. D. R., Millot, R., Négrel, P., Meredith, K., & Cox, M. E. (2015). Stable isotopes of lithium as indicators of coal seam gas-bearing aquifers. Procedia Earth and Planetary Science, 13, 278-281.
- Nicholas, J. R. (1996). Hydrology, Water Quality, and Effects of Drought in Monroe County, Michigan: JR Nicholas, Gary L. Rowe, and JR Brannen; Prepared by Monroe County…[et Al.] (Vol. 94, No. 4161). Department of the Interior, US Geological Survey.
- Rice, Cynthia A., Timothy T. Bartos, and Margaret S. Ellis. 2002. Chemical and isotopic composition of water in the Fort Union and Wasatch formations of the Powder River Basin, Wyoming and Montana: Implications for coalbed methane development.
- Ruhl, L. S., Dwyer, G. S., Hsu-Kim, H., Hower, J. C., & Vengosh, A. (2014). Boron and strontium isotopic characterization of coal combustion residuals: validation of new environmental tracers. Environmental science & technology, 48(24), 14790-14798.
- Schlesinger, W. H., Klein, E. M., Wang, Z., & Vengosh, A. (2021). Global biogeochemical cycle of lithium.
- Schlosser, P., Stute, M., Dörr, H., Sonntag, C., & Münnich, K. O. (1988). Tritium/3He dating of shallow groundwater. Earth and Planetary Science Letters, 89(3-4), 353-362.
- Shand, P., Darbyshire, D. F., Love, A. J., & Edmunds, W. M. (2009). Sr isotopes in natural waters: Applications to source 22haracterization and water–rock interaction in contrasting landscapes. Applied Geochemistry, 24(4), 574-586.
- Spivak-Birndorf, L. J., & Stewart, B. W. (2006, October). Use of boron isotopes to track the interaction of coal utilization byproducts with water in the environment. In The Geological Society of America, 2006 Philadelphia Annual Meeting (pp. 22-25).
- Spivak‐Birndorf, L. J., Stewart, B. W., Capo, R. C., Chapman, E. C., Schroeder, K. T., & Brubaker, T. M. (2012). Strontium Isotope Study of Coal Utilization By‐Products Interacting with Environmental Waters. Journal of environmental quality, 41(1), 144-154.

- Teichert, Z., Eble, C. F., Bose, M., & Williams, L. B. (2022). Effects of contact metamorphism on the lithium content and isotopic composition of kerogen in coal. Chemical Geology, 602, 120885.
- Telloli, C., Rizzo, A., Salvi, S., Pozzobon, A., Marrocchino, E., & Vaccaro, C. (2022). Characterization of groundwater recharge through tritium measurements. Advances in Geosciences, 57, 21-36.
- TRC. August 2016; Revised March 2017. CCR Groundwater Monitoring and Quality Assurance Project Plan – DTE Electric Company Monroe Power Plant Coal Combustion Residual Fly Ash Basin, 7955 East Dunbar Road, Monroe, Michigan. Prepared for DTE Electric Company.
- TRC. October 2017. Groundwater Monitoring System Summary Report Monroe Power Plant Coal Combustion Residual Fly Ash Basin, 7955 East Dunbar Road, Monroe, Michigan. Prepared for DTE Electric Company.
- TRC. January 2018. Annual Groundwater Monitoring Report (2017) DTE Electric Company, Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill, Coal Combustion Residual Unit. Prepared for DTE Electric Company.
- TRC. January 2019. 2018 Annual Groundwater Monitoring Report DTE Electric Company, Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill, Coal Combustion Residual Unit. Prepared for DTE Electric Company.
- TRC. January 2020. 2019 Annual Groundwater Monitoring Report DTE Electric Company, Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill, Coal Combustion Residual Unit. Prepared for DTE Electric Company.
- TRC. January 2021. 2020 Annual Groundwater Monitoring Report DTE Electric Company, Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill, Coal Combustion Residual Unit. Prepared for DTE Electric Company.
- TRC. January 2022. 2021 Annual Groundwater Monitoring Report DTE Electric Company, Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill, Coal Combustion Residual Unit. Prepared for DTE Electric Company.
- TRC. January 2023. 2022 Annual Groundwater Monitoring Report DTE Electric Company, Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill, Coal Combustion Residual Unit. Prepared for DTE Electric Company.
- Wang, Z., Coyte, R. M., Dwyer, G. S., Ruhl, L. S., Hsu-Kim, H., Hower, J. C., & Vengosh, A. (2020). Distinction of strontium isotope ratios between water-soluble and bulk coal fly ash from the United States. International Journal of Coal Geology, 222, 103464.
- Williams, L. B., & Hervig, R. L. (2004). Boron isotope composition of coals: a potential tracer of organic contaminated fluids. Applied Geochemistry, 19(10), 1625-1636.

- Xiao, Y. K., Li, S. Z., Wei, H. Z., Sun, A. D., Liu, W. G., Zhou, W. J., … & Swihart, G. H. (2007). Boron isotopic fractionation during seawater evaporation. Marine chemistry, 103(3-4), 382-392.
- Xiao, J., Vogl, J., Rosner, M., & Jin, Z. (2022). Boron isotope fractionation in soil-plant systems and its influence on biogeochemical cycling. Chemical Geology, 606, 120972.

Tables

Table 1 Summary of Field Data – December 2022Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill – RCRA CCR Monitoring Program

Monroe, Michigan

Notes:

mg/L -Milligrams per Liter.

mV - Millivolts.

SU - Standard Units.

umhos/cm - Micromhos per centimeter.

°C - Degrees Celsius.

NTU - Nephelometric Turbidity Unit

P-01 Plum Creek, LE-01 = Lake Erie, SW-001 = Discharge Point from Fly Ash Basin

Table 2 Summary of Analytical Results – December 2020 to December 2022 Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill – RCRA CCR Monitoring Program China Township, Michigan

Notes:

mg/L = milligram per liter, -- = not analyzed.

Bold font denotes concentrations detected above laboratory reporting limits.

J = estimated value. Concentration above the laboratory method detection limit but below the reporting limit.

P-01 Plum Creek, LE-01 = Lake Erie, SW-001 = Discharge Point from Fly Ash Basin

December 2020 and January 2021 groundwater samples collected by Geosyntec and included in the November 2021 Preliminary Alternative Liner Demonstration Report

Table 3Summary of Stable Isotope and Tritium Results – December 2022 Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill – RCRA CCR Monitoring Program China Township, Michigan

Notes:

‰ = per mil

TU = Tritium Units

-- = not analyzed.

Bold font denotes concentrations detected above laboratory reporting limits.

* - Lithium content is too low for precise measurement.

P-01 Plum Creek, LE-01 = Lake Erie, SW-001 = Discharge Point from Fly Ash Basin

1) - Value displayed is the average of laboratory original and re-run of the sample.

Table 6 Summary Calculated Mineral Saturation – December 2022 Monroe Power Plant Fly Ash Basin and Vertical Extension Landfill – RCRA CCR Monitoring Program China Township, Michigan

Sample Location	Unit	LE-01			MW-16-01 MW-16-02 MW-16-03 MW-16-04 MW-16-05 MW-16-06 MW-16-07				$P-01$	PZ-1	$PZ-2$	PZ-3	PZ-4	PZ-5	SW-001
Alstonite (BaCa $(CO_3)_2$)	log Q/K	-1.90	-4.16	-4.55	-4.78	-4.20	-4.86	-4.33	-2.40 -10.98	4.35	3.83	4.30	1.95	1.80	0.95
Anhydrite (CaSO4)	log Q/K	-2.81	-0.66	-0.65	-0.63	-0.56	-0.66	-0.69	-1.81 -3.53	-2.79	-3.64	-3.23	-2.10	-1.07	-1.18
Antarcticite (CaCl 6H O)	log Q/K	-13.70	-13.82	-13.60	-13.31	-12.61	-13.75	-13.77	-17.06 -12.03	-13.05	-14.64	-13.51	-13.36	-13.06	-13.23
Aragonite (CaCO	log Q/K	0.24	-0.08	-0.16	-0.26	-0.03	-0.28	-0.19	0.15 -3.36	2.50	2.04	2.46	1.94	2.29	1.53
$\overline{2}$ Arcanite (K ₂ SO4) ²	log Q/K	-9.83	-8.70	-8.57	-8.59	-9.15	-8.86	-8.61	-14.73 -9.33	-8.46	-6.26	-7.93	-6.78	-9.00	-8.36
Artinite (Mg (OH) ·3H O)	log Q/K	-6.28	-7.62	-7.76	-8.05	-8.97	-8.16	-7.79	-14.45 -7.35	1.20	2.16	1.60	-0.09	-1.94	-3.60
Ba(OH)2^8H2O $\overline{\mathsf{BaCl2(c)}}$	log Q/K log Q/K	-15.41 -15.77	-18.48 -17.35	-18.78 -17.39	-18.97 -17.10	-18.70 -16.29	-19.03 -17.57	-18.53 -17.27	-22.16 -16.54 -20.87 -14.40	-5.61 -13.25	-5.17 -14.42	-5.26 -13.67	-8.16 -14.85	-10.08 -15.39	-12.91 -14.99
BaCl2^2H2O	log Q/K	-13.34	-15.07	-15.10	-14.83	-14.00	-15.30	-14.98	-18.60 -11.98	-10.96	-12.17	-11.40	-12.54	-13.11	-12.58
BaCl2^H2O	log Q/K	-14.14	-15.80	-15.84	-15.56	-14.74	-16.03	-15.72	-19.33 -12.78	-11.70	-12.89	-12.13	-13.29	-13.85	-13.37
BaF2(c)	log Q/K	-11.46	-10.31	-10.62	-10.63	-10.73	-10.72	-10.35	-13.55 -10.20	-8.52	-7.65	-8.18	-10.11	-11.58	-9.20
BaO(c) 3 ₂	log Q/K	-41.64	-43.61	-43.98	-44.08	-43.87	-44.09	-43.67	-47.25 -42.65	-30.81	-30.12	-30.31	-33.47	-35.25	-38.94
Barite (BaSO ₄) Barytocalcite (BaÇa(CO)	log Q/K log Q/K	-0.17 -2.06	0.18 -4.32	-0.04 -4.72	-0.06 -4.94	0.14 -4.36	-0.13 -5.02	0.19 -4.49	-2.97 0.49 -2.57 -11.14	1.40 4.19	0.90 3.66	0.97 4.14	0.84 1.78	0.99 1.64	1.70 0.79
BaS(c)	log Q/K	-74.78	-54.93	-53.49	-53.84	-55.33	-54.35	-52.08	-55.83 -72.07	-98.59	-87.76	-101.60	-103.40	-85.08	-74.71
Bassanite (CaSO · 1/2H O)	log Q/K	-3.44	-1.30	-1.28	-1.27	-1.20	-1.29	-1.32	-2.45 -4.16	-3.42	-4.27	-3.86	-2.73	-1.70	-1.82
Bischofite (MgCl .6H O)	log Q/K	-14.73	-14.58	-14.36	-14.08	-14.03	-14.55	-14.52	-17.90 -13.14	-15.46	-16.36	-15.86	-15.50	-15.77	-14.66
Bloedite (Bloedite) Borax (Na H B O	log Q/K log Q/K	-15.27 -26.64	-12.31 -27.72	-11.88 -26.58	-11.73 -26.33	-12.42 -28.20	-12.21 -28.14	-11.93 -26.88	-12.33 -21.00 -46.33 -26.28	-15.69 -20.75	-13.61 -20.66	-15.85 -21.94	-14.13 -21.66	-16.46 -20.73	-12.04 -20.22
Boric acid (H3BO3)	log Q/K	-6.16	-5.62	-5.42	-5.34	-5.81	-5.69	-5.49	-8.70 -6.11	-6.89	-7.64	-7.42	-6.78	-5.32	-5.19
Brucite (Mg(OH))	log Q/K	-4.67	-5.81	-5.87	-6.04	-6.55	-6.09	-5.88	-9.28 -5.55	2.07	2.83	2.46	1.06	-0.56	-2.85
Burkeite (Na6(CO3)(SO4)2)	log Q/K	-29.99	-30.87	-29.72	-29.42	-29.56	-30.66	-29.77	-48.53 -25.03	-24.97	-17.87	-23.97	-24.45	-33.49	-24.32
Ca(OH)2(c) Ca2Cl2(OH)2^H2O	log Q/K log Q/K	-10.75 -23.60	-11.94 -25.09	-12.01 -24.94	-12.16 -24.81	-12.03 -23.96	-12.17 -25.26	-12.02 -25.12	-11.53 -15.33 -31.73 -22.73	-2.43 -14.80	-2.31 -16.31	-2.07 -14.93	-3.73 -16.39	-4.75 -17.14	-8.49 -20.90
Ca4Cl2(OH)6^13H2O	log Q/K	-37.72	-43.22	-43.11	-43.43	-42.21	-43.95	-43.40	-56.70 -38.59	-13.81	-15.43	-13.45	-17.82	-20.84	-30.79
CaCl2^2H2O	log Q/K	-18.39	-18.23	-18.03	-17.72	-17.03	-18.14	-18.18	-21.47 -16.69	-17.48	-19.01	-17.91	-17.82	-17.49	-17.86
CaCl2^4H2O CaCl2^H2O	log Q/K log Q/K	-14.70	-14.73 -18.43	-14.52	-14.22 -17.92	-13.53	-14.65 -18.34	-14.68	-17.97 -13.02 -21.67	-13.97 -17.68	-15.54	-14.42 -18.11	-14.28 -18.02	-13.98 -17.69	-14.21 -18.10
Calcite (CaCO3)	log Q/K	-18.63 0.41	0.08	-18.23 0.01	-0.10	-17.23 0.13	-0.12	-18.39 -0.02	-16.93 0.32 -3.19	2.67	-19.21 2.21	2.63	2.10	2.46	1.70
Carnallite (KMgCl3.6(H2O))	log Q/K	-21.67	-22.08	-21.70	-21.29	-21.21	-22.10	-21.95	-28.61 -19.49	-21.39	-21.58	-21.54	-21.10	-22.85	-21.43
CaSO4^1/2H2O(beta)	log Q/K	-3.64	-1.48	-1.47	-1.45	-1.38	-1.48	-1.50	-2.64 -4.34	-3.61	-4.45	-4.04	-2.92	-1.89	-2.01
Celestite (SrSO4) Chloromagnesite (MgCl2)	log Q/K log Q/K	-2.87 -34.18	-0.24 -33.26	-0.21 -33.09	-0.22 -32.74	-0.08 -32.75	-0.23 -33.19	-0.26 -33.22	-0.04 -1.62 -36.56 -32.50	-1.60 -34.19	-2.23 -34.93	-1.87 -34.49	-1.68 -34.31	-0.47 -34.48	-0.91 -33.96
Colemanite (Ca2B6O11.5H2O)	log Q/K	-33.41	-33.18	-32.10	-31.98	-34.47	-34.12	-32.57	-58.45 -34.79	-21.74	-26.17	-24.30	-23.62	-17.01	-23.21
Dolomite (CaMg(CO3)2)	log Q/K	1.29	0.83	0.68	0.46	0.27	0.39	0.63	-5.79 1.01	4.36	4.11	4.34	3.50	3.64	3.44
Dolomite-dis (CaMg(CO3)2)	log Q/K	-0.43	-0.82	-0.97	-1.19	-1.38	-1.26	-1.02	-0.70 -7.44	2.71	2.47	2.69	1.84	1.99	1.74 3.44
Dolomite-ord (CaMg(CO3)2) Epsomite (MgSO4·7H2O)	log Q/K log Q/K	1.29 -5.25	0.83 -3.06	0.68 -3.04	0.46 -3.05	0.27 -3.62	0.39 -3.12	0.63 -3.08	-5.79 1.01 -4.36 -6.01	4.36 -6.83	4.11 -7.04	4.34 -7.23	3.50 -5.84	3.64 -5.41	-4.07
Fe(OH)3(ppd)	log Q/K	-1.25	-1.45	-1.08	-0.61	-1.56	-0.61	-0.36	-0.77 -1.29	-3.02	-3.52	-3.39	-2.31	-2.29	-0.97
Fe2(SO4)3(c)	log Q/K	-56.08	-44.22	-43.34	-41.72	-43.95	-41.69	-41.87	-41.20 -50.58	-82.40	-85.82	-85.21	-75.25	-68.75	-57.02
FeF3(c) Ferrite-2-Ca (Ca2Fe2O5)	log Q/K	-16.86 -26.64	-10.54 -29.12	-10.19 -28.54	-9.42	-10.95 -29.52	-9.47 -27.87	-9.44 -27.11	-9.19 -13.30 -34.53 -28.25	-28.73	-28.56 -13.94	-29.09 -13.23	-26.61	-25.90 -16.44	-16.89 -21.49
Ferrite-Ca (Ca(FeO2)2)	log Q/K log Q/K	-2.09	-3.82	-3.15	-27.88 -2.37	-4.12	-2.37	-1.72	-2.97 -5.86	-13.25 2.56	1.66	2.17	-14.46 2.70	1.69	0.71
Ferrite-Mg (MgFe2O4)	log Q/K	-2.16	-3.67	-3.00	-2.22	-4.63	-2.26	-1.57	-5.78 -3.13	1.07	0.84	0.73	1.48	-0.11	0.23
Fluorite (CaF2)	log Q/K	-2.31	0.29	0.23	0.23	0.01	0.17	0.21	-2.68 -0.75	-1.25	-0.81	-0.97	-1.56	-2.19	-0.36
Gaylussite (Na Ca(CO) · 5H O) Goethite (α-FeO(OH))	log Q/K log Q/K	-8.20 3.40	-11.06 3.09	-10.77 3.47	-10.91 3.93	-10.58 2.99	-11.35 3.93	-10.84 4.19	-7.43 -20.51 3.35 3.77	-3.33 1.53	-1.29 1.02	-2.85 1.15	-4.50 2.25	-7.68 2.26	-5.35 3.66
Graphite (C)	log Q/K	-33.00	-22.21	-21.39	-21.50	-22.26	-21.72	-20.81	-31.27 -20.96	-51.58	-46.46	-53.27	-52.99	-42.50	-34.85
Gypsum (CaSO 4.2H2O)	log Q/K	-2.40	-0.35	-0.32	-0.32	-0.25	-0.35	-0.37	-1.42 -3.21	-2.47	-3.33	-2.92	-1.77	-0.75	-0.80
Halite (NaCl) Hematite (Fe2O3)	log Q/K log Q/K	-8.09 7.69	-8.83 7.10	-8.53 7.85	-8.32 8.78	-8.06 6.90	-8.72 8.78	-8.60 9.29	-11.90 -6.73 7.58 8.46	-7.20 3.98	-6.42	-7.09 3.22	-7.41 5.42	-9.16 5.43	-7.64 8.22
Hexahydrite (MgSO4 · 6H2O)	log Q/K	-5.63	-3.40	-3.38	-3.38	-3.96	-3.45	-3.42	-6.35 -4.74	-7.17	2.95 -7.37	-7.56	-6.19	-5.75	-4.45
Huntite (Mg3Ca(CO3)4)	log Q/K	-4.19	-4.66	-4.97	-5.40	-6.46	-5.58	-5.06	-17.97 -4.80	0.74	0.96	0.78	-0.73	-1.01	-0.25
Hydroboracite (CaMgB6O8(OH)6·3H2 log Q/K		-28.50	-29.75	-28.57	-28.60	-31.65	-30.84	-29.12	-55.16 -30.16	-19.86	-23.97	-22.58	-21.29	-15.46	-19.03
Hydromagnesite (Mg (CO) (OH) 4H log Q/K Hydrophilite (CaCl2)	log Q/K	-13.65 -22.60	-15.06 -22.26	-15.44 -22.06	-16.04 -21.74	-18.26 -21.06	-16.31 -22.16	-15.53 -22.21	-31.93 -15.23 -25.48 -20.88	-3.43 -21.51	-1.78 -23.01	-2.94 -21.92	-5.63 -21.87	-8.11 -21.51	-8.30 -22.04
Jarosite-K (KFe3(SO4)2(OH)6)	log Q/K	-16.23	-10.50	-9.23	-7.52	-10.78	-7.64	-7.09	-10.66 -13.35	-32.58	-34.26	-34.50	-26.71	-24.59	-15.46
Jarosite-Na (NaFe3(SO4)2(OH)6)	log Q/K	-16.75	-12.36	-10.89	-9.18	-12.16	-9.42	-8.79	-13.23 -12.42	-34.31	-36.18	-36.53	-28.86	-27.16	-15.92
K2CO3^3/2H2O	log Q/K	-15.46	-16.92	-16.87	-17.02	-17.42	-17.29	-16.91	-23.36 -16.05	-11.96	-9.40	-11.05	-11.53	-14.44	-14.34
K8H4(CO3)6^3H2O Kainite (KMg(SO4)Cl-3H2O)	log Q/K log Q/K	-56.35 -14.55	-60.14 -12.71	-59.97 -12.54	-60.45 -12.40	-61.85 -12.95	-61.53 -12.80	-60.13 -12.65	-57.33 -85.66 -13.04 -18.86	-54.17 -14.92	-45.00 -14.36	-51.29 -15.04	-51.02 -13.62	-59.85 -14.64	-53.78 -13.16
Kalicinite (KHCO3)	log Q/K	-6.41	-6.62	-6.60	-6.65	-6.80	-6.78	-6.63	-9.78 -6.36	-7.61	-6.60	-7.34	-7.04	-7.79	-6.32
Kieserite (MgSO4·H2O)	log Q/K	-7.75	-5.26	-5.26	-5.24	-5.83	-5.30	-5.29	-6.82 -8.20	-9.04	-9.19	-9.41	-8.09	-7.62	-6.51
KMgCl3 KMgCl3^2H2O	log Q/K log Q/K	-40.60 -32.51	-40.26 -32.48	-39.93 -32.13	-39.45 -31.67	-39.41 -31.62	-40.24 -32.47	-40.14 -32.35	-46.76 -38.33 -38.99 -30.28	-39.62 -31.82	-39.64 -31.90	-39.67 -31.91	-39.40 -31.57	-41.05 -33.26	-40.22 -32.19
KNaCO3^6H2O	log Q/K	-10.18	-12.44	-12.22	-12.33	-12.46	-12.69	-12.27	-10.08 -18.76	-7.37	-4.90	-6.69	-7.43	-10.69	-8.89
Leonhardtite (MgSO4•4H2O)	log Q/K	-6.65	-4.30	-4.28	-4.28	-4.86	-4.34	-4.32	-7.24 -5.74	-8.07	-8.25	-8.45	-7.10	-6.65	-5.44
Lime (CaO)	log Q/K	-21.78	-22.61	-22.71	-22.83	-22.71	-22.82	-22.70	-25.99 -22.52	-13.12	-12.93	-12.72	-14.46	-15.44	-19.45
Magnesite (MgCO3) Mercallite (KHSO4)	log Q/K log Q/K	-0.90 -14.18	-0.97 -11.81	-1.05 -11.71	-1.15 -11.63	-1.58 -11.95	-1.21 -11.77	-1.06 -11.74	-4.32 -1.07 -14.56 -13.03	-0.03 -17.52	0.19 -16.88	0.00 -17.64	-0.33 -15.70	-0.54 -15.77	-0.01 -13.74
Mg2Cl(OH)3^4H2O	log Q/K	-12.09	-14.27	-14.23	-14.39	-15.10	-14.72	-14.35	-12.68 -21.16	-2.86	-2.30	-2.55	-4.34	-6.98	-9.42
MgCl2^2H2O	log Q/K	-24.14	-23.58	-23.39	-23.07	-23.05	-23.53	-23.53	-26.89 -22.50	-24.49	-25.31	-24.83	-24.57	-24.79	-23.99
MgCl2^4H2O MgCl2^H2O	log Q/K	-18.04 -27.87	-17.74 -27.17	-17.54 -26.99	-17.24 -26.65	-17.20 -26.64	-17.70 -27.11	-17.69 -27.12	-16.43 -21.06 -26.22	-18.63 -28.08	-19.51	-19.01 -28.41	-18.68 -28.18	-18.94 -28.38	-17.94 -27.70
MgF2(c)	log Q/K log Q/K	-5.91	-2.96	-3.03	-3.02	-3.90	-3.11	-3.04	-30.47 -6.00 -4.41	-6.15	-28.87 -5.01	-5.79	-6.20	-7.39	-4.34
MgOHCI	log Q/K	-16.02	-16.22	-16.16	-16.08	-16.33	-16.33	-16.24	-15.64 -19.61	-12.74	-12.75	-12.70	-13.29	-14.20	-15.02
MgSO4(c)	log Q/K	-13.41	-10.73	-10.73	-10.70	-11.30	-10.75	-10.75	-13.66 -12.47	-14.52	-14.62	-14.85	-13.59	-13.09	-12.14
MHSH(Mg1.5) Mirabilite (Na2SO4·10H2O)	log Q/K log Q/K	-11.36 -8.22	-9.36 -7.87	-9.39 -7.45	-9.45 -7.33	-10.31 -7.41	-9.54 -7.75	-9.42 -7.48	-14.04 -10.87 -13.63 -6.22	-9.21 -7.47	-8.96 -5.27	-9.36 -7.29	-8.77 -6.85	-9.10 -9.66	-9.20 -6.25
Misenite (K8H8(SO4)7)	log Q/K	-93.52	-78.48	-77.72	-77.25	-79.74	-78.38	-77.94	-86.11 -101.00	-112.50	-106.50	-112.70	-99.84	-102.50	-89.45
Molysite (FeCl3)	log Q/K	-45.77	-42.88	-42.17	-40.91	-41.10	-41.50	-41.61	-41.93 -41.97	-57.65	-60.40	-59.06	-55.61	-53.42	-47.89
Monohydrocalcite (CaCO3·H2O)	log Q/K	-0.55	-0.89 -21.27	-0.96 -20.62	-1.07 -20.31	-0.84 -20.51	-1.08 -20.94	-0.99 -20.66	-0.65 -4.16 -20.00 -29.63	1.70 -26.51	1.24 -23.60	1.66 -26.58	1.14 -24.64	1.49 -27.77	0.73 -21.21
Na3H(SO4)2 NaFeO ₂ (c)	log Q/K log Q/K	-23.93 -12.33	-13.69	-13.17	-12.69	-13.67	-12.87	-12.43	-12.23 -16.14	-9.25	-8.09	-9.09	-9.27	-11.64	-10.68
Nesquehonite (MgCO3 · 3H2O)	log Q/K	-4.14	-4.07	-4.15	-4.25	-4.69	-4.30	-4.17	-4.30 -7.41	-3.14	-2.89	-3.10	-3.45	-3.65	-3.23
Pentahydrite (MgSO4•5(H2O))	log Q/K	-5.95	-3.72	-3.70	-3.71	-4.28	-3.77	-3.74	-5.06 -6.67	-7.49	-7.69	-7.88	-6.51	-6.07	-4.76
Pirssonite (Na2Ca(CO3)2·2(H2O)) Portlandite (Ca(OH)2)	log Q/K log Q/K	-9.22 -10.75	-11.75 -11.94	-11.48 -12.01	-11.59 -12.16	-11.29 -12.03	-12.03 -12.17	-11.53 -12.02	-21.19 -8.41 -15.33 -11.53	-4.04 -2.43	-1.93 -2.31	-3.52 -2.07	-5.24 -3.73	-8.38 -4.75	-6.31 -8.49
Sr(OH)2(c)	log Q/K	-17.47	-17.97	-18.05	-18.20	-18.00	-18.18	-18.06	$-18.30 - 17.98$	-7.71	-7.32	-7.16	-9.80	-10.62	-14.83
SrCl2(c)	log Q/K	-19.98	-19.21	-19.01	-18.71	-17.96	-19.11	-19.17	$-19.39 - 18.01$	-17.70	-18.99	-17.95	-18.83	-18.30	-19.09
SrCl2^2H2O	log Q/K	-14.82	-14.26	-14.04	-13.76	-13.00	-14.17	-14.21	-14.44 -12.87	-12.74	-14.07	-13.01	-13.84	-13.34	-13.97
SrCl2^6H2O SrCl2^H2O	log Q/K log Q/K	-12.45 -16.51	-12.07 -15.87	-11.85 -15.66	-11.58 -15.36	-10.81 -14.61	-12.00 -15.77	-12.03 -15.82	-12.26 -10.52 -16.05 -14.55	-10.54 -14.35	-11.91 -15.66	-10.84 -14.61	-11.62 -15.46	-11.15 -14.95	-11.63 -15.64
SrF2(c)	log Q/K	-7.38	-4.13	-4.18	-4.19	-4.35	-4.22	-4.21	-4.03 -5.54	-4.91	-4.21	-4.44	-6.00	-6.44	-5.05
SrO(c)	log Q/K	-33.31	-33.31	-33.42	-33.53	-33.37	-33.50	-33.41	-33.62 -33.76	-23.08	-22.59	-22.47	-25.23	-25.98	-30.58
SrS(c) Strontianite (SrCO3)	log Q/K log Q/K	-74.86 1.05	-52.80 1.19	-51.10 1.12	-51.45 0.99	-53.00 1.30	-51.89 0.99	-49.99 1.08	-50.35 -71.56 0.97 1.21	-99.03 4.54	-88.35 4.30	-101.90 4.66	-103.30 3.20	-83.98 3.73	-74.71 2.67
Sulfur-Rhmb (S)	log Q/K	-44.33	-26.52	-25.17	-25.27	-26.59	-25.61	-24.32	$-24.30 - 41.03$	-71.80	-64.31	-74.58	-72.97	-57.32	-46.35
Sylvite (KCI)	log Q/K	-8.06	-8.59	-8.43	-8.29	-8.26	-8.64	-8.51	-11.80 -7.46	-7.02	-6.29	-6.77	-6.69	-8.16	-7.89
Tachyhydrite (CaMg2Cl6·12H2O) Thenardite (Na2SO4)	log Q/K log Q/K	-48.24	-47.73	-47.11	-46.21	-45.45	-47.58	-47.57	-57.61 -43.34	-48.74	-52.08	-49.96	-49.16	-49.37	-47.55
Witherite (BaCO3)	log Q/K	-10.08 2.01	-9.37 -0.09	-8.97 -0.40	-8.81 -0.54	-8.92 -0.17	-9.22 -0.60	-8.98 -0.15	-15.11 -8.04 -3.65 1.58	-8.98 5.85	-6.71 5.74	-8.76 5.82	-8.41 4.02	-11.17 3.50	-8.04 3.55

Notes:

Positive values are oversaturated and may precipitate out of solution

Negative values are undersaturated and may dissolve into solution

Figures

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MONITORING WELLS

SURFACE WATER SAMPLE POINT

APPROXIMATE BOUNDARY OF FLY ASH BASIN

APPROXIMATE BOUNDARY OF VERTICAL EXTENSION LANDFILL

NOTES

- 1. BASE MAP IMAGERY FROM GOOGLE EARTH PRO, 2021.
- 2. MONITORING WELL LOCATIONS SURVEYED BY BMJ ENGINEERS AND SURVEYORS INC. IN MARCH AND MAY 2016.
- 3. PIEZOMETER LOCATION DATA COLLECTED WITH PORTABLE GPS UNIT BY GEOSYNTECH IN DECEMBER 2020.

SURFACE WATER SAMPLE

APPROXIMATE FLY ASH BASIN BOUNDARY

NOTES

- 1. BASE MAP IMAGERY FROM GOOGLE EARTH PRO, 2021.
- 2. SURFACE WATER SAMPLE LOCATION IS APPROXIMATE.

LEGEND

APPROXIMATE BOUNDARY OF FLY ASH BASIN

APPROXIMATE BOUNDARY OF VERTICAL EXTENSION LANDFILL

- POTENTIOMETRIC SURFACE CONTOUR
- INFERRED POTENTIOMETRIC SURFACE CONTOUR

INFERRED GROUNDWATER FLOW DIRECTION

(582.84) STATIC WATER ELEVATION IN FEET (NAVD, 1988)

NOTES

- 1. BASE MAP IMAGERY FROM GOOGLE EARTH PRO, 2021.
- 2. WELL LOCATIONS SURVEYED BY BMJ ENGINEERS AND SURVEYORS INC. IN MARCH AND MAY 2016.
- 3. GROUNDWATER ELEVATIONS DISPLAYED IN FEET RELATIVE TO NORTH AMERICAN VERTICAL DATUM OF 1988.

Summary of Caclium and Sulfate Saturation with Chloride and Sulfate Concentrations Monroe Power Plant Fly Ash Basin CCR Unit 7955 East Dunbar Road, Monroe, Michigan

Figure 6

Figure 7 Molybdenum and Barium with Boron Concentrations Monroe Power Plant Fly Ash Basin CCR Unit 7955 East Dunbar Road, Monroe, Michigan

Summary of Lithium and Boron Isotopic and Concentration Results Monroe Power Plant Fly Ash Basin CCR Unit 7955 East Dunbar Road, Monroe, Michigan

Figure 8

Figure 9 Summary of Strontium and Boron Isotopic and Concentration Results Monroe Power Plant Fly Ash Basin CCR Unit 7955 East Dunbar Road, Monroe, Michigan

Figure 10 Summary of Hydrogen and Oxygen Isotopic Results with Carbonate Solubility Monroe Power Plant Fly Ash Basin CCR Unit 7955 East Dunbar Road, Monroe, Michigan

Figure 11 Tritium Data and Age Model Monroe Power Plant Fly Ash Basin CCR Unit 7955 East Dunbar Road, Monroe, Michigan

Figure 14. MONPP FAB LDA Origin
Discriminant Analysis (3/1/2023 09:36:57)
Canonical Discriminant Analysis **Figure 14. MONPP FAB LDA Origin**

Figure 14. MONPP FAB LDA
C is criminant Analysis (3/1/2023 09:36:57)
Canonical Discriminant Analysis
Eigenvalues

*Classification Summary for Training Data
Classification Count
Classification Count*

Error rate for classification of training data is 0.00%.

Figure 15. MONPP FAB Density of LDA Scores

Figure 16. MONPP FAB LDA ANOVA

Figure 16. MONPP FAB LDA ANO
ANOVAOneWay (3/24/2023 12:45:45)
Descriptive Statistics ANOVAOneWay (3/24/2023 12:45:45)
Descriptive Statistics

Null Hypothesis: The means of all levels are equal.

Alternative Hypothesis: The means of one or more levels are different.

At the 0.05 level, the population means are significantly different.

Figure 17. MONPP FAB Time Series (1 of 2)

Figure 17. MONPP FAB Time Series (2 of 2)

Appendix A December 2022 Laboratory Data

ALS Environmental

05-Jan-2021

Geosyntec Consultants Michael Coram 2100 Commonwealth Blvd. Ann Arbor, MI 48105 Suite 100

Re: **DTE- Monroe (GLP-8014)** Work Order: **20121750**

Dear Michael,

ALS Environmental received 5 samples on 18-Dec-2020 10:00 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental - Holland and for only the analyses requested.

Sample results are compliant with industry accepted practices and Quality Control results achieved laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 26.

If you have any questions regarding this report, please feel free to contact me:

ADDRESS: 3352 128th Avenue, Holland, MI, USA PHONE: +1 (616) 399-6070 FAX: +1 (616) 399-6185

Sincerely,

Electronically approved by: Chad Whelton

Enuironmental

Project Manager Chad Whelton

Report of Laboratory Analysis

Certificate No: MN 026-999-449

ALS GROUP USA, CORP Part of the ALS Laboratory Group A Campbell Brothers Limited Company

www.alsqlobal.com

Work Order Sample Summary

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Samples for the above noted Work Order were received on 12/18/2020. The attached "Sample Receipt Checklist" documents the status of custody seals, container integrity, preservation, and temperature compliance.

Samples were analyzed according to the analytical methodology previously transmitted in the "Work Order Acknowledgement". Methodologies are also documented in the "Analytical Result" section for each sample. Quality control results are listed in the "QC Report" section. Sample association for the reported quality control is located at the end of each batch summary. If applicable, results are appropriately qualified in the Analytical Result and QC Report sections. The "Qualifiers" section documents the various qualifiers, units, and acronyms utilized in reporting. A copy of the laboratory's scope of accreditation is available upon request.

With the following exceptions, all sample analyses achieved analytical criteria.

Metals:

No other deviations or anomalies were noted.

Wet Chemistry:

Batch R306912, Method SW9040C, Sample PZ-3 (20121750-03B): Possible bias due to sodium error at pH > 10. A low sodium electrode is not used in the measurement process.

Batch R306825, Method SW9040C, Sample LCS-R306825: Samples were processed outside of holding time for pH, as the analysis is a field test and holding time is defined as 15 minutes.Batch R307145, Method IC_9056_W, Sample 20121752-03B MSD: 1

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Client: Geosyntec Consultants

Project: DTE- Monroe (GLP-8014)

Sample ID: PZ-1

Collection Date: 12/14/2020 08:00 AM **Matrix:** GROUNDWATER

Work Order: 20121750 **Lab ID:** 20121750-01

Sample ID: PZ-2

Project: DTE- Monroe (GLP-8014)

Client: Geosyntec Consultants

Work Order: 20121750 **Lab ID:** 20121750-02

Collection Date: 12/14/2020 09:00 AM **Matrix:** GROUNDWATER

Work Order: 20121750 **Lab ID:** 20121750-03

Sample ID: PZ-3

Collection Date: 12/15/2020 08:00 AM **Matrix:** GROUNDWATER

Project: DTE- Monroe (GLP-8014)

Client: Geosyntec Consultants

Sample ID: PZ-4

Project: DTE- Monroe (GLP-8014)

Client: Geosyntec Consultants

Work Order: 20121750 **Lab ID:** 20121750-04

Collection Date: 12/14/2020 10:00 AM **Matrix:** GROUNDWATER

Note: See Qualifiers page for a list of qualifiers and their definitions.

Analytical Results Page 4 of 5

Work Order: 20121750 **Lab ID:** 20121750-05

Sample ID: PZ-5

Client: Geosyntec Consultants

Project: DTE- Monroe (GLP-8014)

Collection Date: 12/15/2020 10:00 AM **Matrix:** GROUNDWATER

QC BATCH REPORT

Batch ID: 169919 **Instrument ID HG4** Method: **SW7470A MBLK** Sample ID: **MBLK-169919-169919**

Client: Geosyntec Consultants **Work Order:** 20121750

Project: DTE- Monroe (GLP-8014)

Batch ID: **170071** Instrument ID **HG4** Method: **SW7470A**

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

QC BATCH REPORT

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Batch ID: **170083** Instrument ID **ICPMS4** Method: **SW6020B**

Client: Geosyntec Consultants **Work Order:** 20121750

Project: DTE- Monroe (GLP-8014)

QC BATCH REPORT

Batch ID: **169592** Instrument ID **TDS** Method: **A2540 C-11**

Batch ID: **R306822** Instrument ID **Titrator 1** Method: **A2320 B-11**

The following samples were analyzed in this batch: 20121750-01B 20121750-02B 20121750-04B

Batch ID: **R306825** Instrument ID **Titrator 1** Method: **SW9040C**

Batch ID: **R306910** Instrument ID **Titrator 1** Method: **A2320 B-11**

The following samples were analyzed in this batch: 20121750-03B 20121750-05B

Batch ID: **R306912** Instrument ID **Titrator 1** Method: **A4500-H B-11**

Batch ID: **R307142** Instrument ID IC3 Method: **SW9056A**

Batch ID: **R307145** Instrument ID IC4 Method: **SW9056A**

Batch ID: **R307276** Instrument ID IC3 Method: **SW9056A**

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited

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ALS Group, USA

Sample Receipt Checklist

Login Notes:

LIMS Version: 7.012

Tuesday, January 19, 2021

Michael Coram Geosyntec Consultants 2100 Commonwealth Blvd. Suite 100 Ann Arbor, MI 48105

Re: ALS Workorder: 2012398 Project Name: DTE - Monroe Project Number: GLP-8014

Dear Mr. Coram:

Five water samples were received from Geosyntec Consultants, on 12/18/2020. The samples were scheduled for the following analyses:

The results for these analyses are contained in the enclosed reports.

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, ALS certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental.

Thank you for your confidence in ALS Environmental. Should you have any questions, please call.

Sincerely,

Mir Ellija

ALS Environmental Julie Ellingson Project Manager

www.alsglobal.com

Accreditations: ALS Environmental – Fort Collins is accredited by the following accreditation bodies for various testing scopes in accordance with requirements of each accreditation body. All testing is performed under the laboratory management system, which is maintained to meet these requirement and regulations. Please contact the laboratory or accreditation body for the current scope testing parameters.

40 CFR Part 136: All analyses for Clean Water Act samples are analyzed using the 40 CFR Part 136 specified method and include all the QC requirements.

2012398

Radium-228:

The samples were analyzed for the presence of 228 Ra by low background gas flow proportional counting of ²²⁸Ac, which is the ingrown progeny of ²²⁸Ra, according to the current revision of SOP 724.

All acceptance criteria were met.

Radium-226:

The samples were prepared and analyzed according to the current revision of SOP 783.

All acceptance criteria were met.

ALS -- Fort Collins

Sample Number(s) Cross-Reference Table

OrderNum: 2012398 **Client Name:** Geosyntec Consultants **Client Project Name:** DTE - Monroe **Client Project Number:** GLP-8014 **Client PO Number:**

ţ 2. Unless outer was agreed in a formal contract, services provided by ALS Edwirommental are
3. The Chain of Custody is a legal document. All information must be completed accurately.

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ALS Environmental - Fort Collins CONDITION OF SAMPLE UPON RECEIPT FORM

 $\langle \rangle$

+IR Gun #3, VWR SN 170647571 +IR Gun #5, VWR SN 192272629

SAMPLE SUMMARY REPORT

B - Result is less than the requested reporting limit but greater than the instrument method detection limit (MDL).

U or ND - Indicates that the compound was analyzed for but not detected.

E - The reported value is estimated because of the presence of interference. An explanatory note may be included in the narrative.

M - Duplicate injection precision was not met.

N - Spiked sample recovery not within control limits. A post spike is analyzed for all ICP analyses when the matrix spike and or spike duplicate fail and the native sample concentration is less than four times the spike added concentration.

Z - Spiked recovery not within control limits. An explanatory note may be included in the narrative.

* - Duplicate analysis (relative percent difference) not within control limits.

S - SAR value is estimated as one or more analytes used in the calculation were not detected above the detection limit.

Organics:

U or ND - Indicates that the compound was analyzed for but not detected.

B - Analyte is detected in the associated method blank as well as in the sample. It indicates probable blank contamination and warns the data user.

E - Analyte concentration exceeds the upper level of the calibration range.

J - Estimated value. The result is less than the reporting limit but greater than the instrument method detection limit (MDL).

A - A tentatively identified compound is a suspected aldol-condensation product.

X - The analyte was diluted below an accurate quantitation level.

* - The spike recovery is equal to or outside the control criteria used.

- + The relative percent difference (RPD) equals or exceeds the control criteria.
- G A pattern resembling gasoline was detected in this sample.
- D A pattern resembling diesel was detected in this sample.
- M A pattern resembling motor oil was detected in this sample.

C - A pattern resembling crude oil was detected in this sample.

- 4 A pattern resembling JP-4 was detected in this sample.
- 5 A pattern resembling JP-5 was detected in this sample.
- H Indicates that the fuel pattern was in the heavier end of the retention time window for the analyte of interest.
- L Indicates that the fuel pattern was in the lighter end of the retention time window for the analyte of interest.

Z - This flag indicates that a significant fraction of the reported result did not resemble the patterns of any of the following petroleum hydrocarbon products:

- gasoline
- JP-8 - diesel
- mineral spirits
- motor oil - Stoddard solvent
- bunker C

ALS -- Fort Collins **Date:** *1/19/2021 2:19:4*

Project: GLP-8014 DTE - Monroe **Client:** Geosyntec Consultants **Work Order:** 2012398

QC BATCH REPORT

Project: GLP-8014 DTE - Monroe

QC BATCH REPORT

2012398-4 2012398-5

11-Feb-2021

Geosyntec Consultants Michael Coram 2100 Commonwealth Blvd. Ann Arbor, MI 48105 Suite 100

Re: **DTE- Monroe (GLP-8014)** Work Order: **21020221**

Dear Michael,

ALS Environmental received 5 samples on 03-Feb-2021 09:00 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental - Holland and for only the analyses requested.

Sample results are compliant with industry accepted practices and Quality Control results achieved laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 30.

If you have any questions regarding this report, please feel free to contact me:

ADDRESS: 3352 128th Avenue, Holland, MI, USA PHONE: +1 (616) 399-6070 FAX: +1 (616) 399-6185

Sincerely,

Electronically approved by: Chad Whelton

Enutronmental

Project Manager Chad Whelton

Report of Laboratory Analysis

Certificate No: MN 026-999-449

ALS GROUP USA, CORP Part of the ALS Laboratory Group A Campbell Brothers Limited Company

www.alsqlobal.com

ALS Group, USA Date: 11-Feb-21

Work Order Sample Summary

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ALS Group, USA

Samples for the above noted Work Order were received on 02/03/2021. The attached "Sample Receipt Checklist" documents the status of custody seals, container integrity, preservation, and temperature compliance.

Samples were analyzed according to the analytical methodology previously transmitted in the "Work Order Acknowledgement". Methodologies are also documented in the "Analytical Result" section for each sample. Quality control results are listed in the "QC Report" section. Sample association for the reported quality control is located at the end of each batch summary. If applicable, results are appropriately qualified in the Analytical Result and QC Report sections. The "Qualifiers" section documents the various qualifiers, units, and acronyms utilized in reporting. A copy of the laboratory's scope of accreditation is available upon request.

With the following exceptions, all sample analyses achieved analytical criteria.

Metals:

Batch 171827, Method SW6020B, Sample 21020221-05C MS/MSD: The MS/MSD recoveries were outside of the control limits for Boron, Calcium, and Molybdenum; however, the results in the parent sample are greater than 4x the spike amount. No qualification is required.

Wet Chemistry:

Batch R309524, Method SW9040C, Sample PZ-1 (21020221-01B): Possible bias due to sodium error at pH > 10. A low sodium electrode is not used in the measurement process.

Batch R309524, Method SW9040C, Sample PZ-1 (21020221-01B): pH is considered a "field test" and, as such, the recommended sample holding time expired prior to sample receipt.

Batch R309524, Method SW9040C, Sample PZ-2 (21020221-02B): Possible bias due to sodium error at pH > 10. A low sodium electrode is not used in the measurement process.

Batch R309524, Method SW9040C, Sample PZ-2 (21020221-02B): pH is considered a "field test" and, as such, the recommended sample holding time expired prior to sample receipt.

Batch R309524, Method SW9040C, Sample PZ-3 (21020221-03B): Possible bias due to sodium error at pH > 10. A low sodium electrode is not used in the measurement process.

Batch R309524, Method SW9040C, Sample PZ-3 (21020221-03B): pH is considered a "field

test" and, as such, the recommended sample holding time expired prior to sample receipt.

Batch R309524, Method SW9040C, Sample PZ-4 (21020221-04B): Possible bias due to sodium error at pH > 10. A low sodium electrode is not used in the measurement process.

Batch R309524, Method SW9040C, Sample PZ-4 (21020221-04B): pH is considered a "field test" and, as such, the recommended sample holding time expired prior to sample receipt.

Batch R309524, Method SW9040C, Sample PZ-5 (21020221-05B): pH is considered a "field test" and, as such, the recommended sample holding time expired prior to sample receipt.

Batch R309401, Method SW9056A, Sample PZ-5 (21020221-05B): The reporting limit for fluoride is elevated due to dilution for high concentrations of non-target analytes.

ALS Group, USA Date: 11-Feb-21

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Client: Geosyntec Consultants

Project: DTE- Monroe (GLP-8014)

Sample ID: PZ-1

Collection Date: 1/28/2021 10:40 AM **Matrix:** GROUNDWATER

Work Order: 21020221 **Lab ID:** 21020221-01

Sample ID: PZ-1

Project: DTE- Monroe (GLP-8014)

Client: Geosyntec Consultants

Work Order: 21020221 **Lab ID:** 21020221-01

Collection Date: 1/28/2021 10:40 AM **Matrix:** GROUNDWATER

Project: DTE- Monroe (GLP-8014) **Client:** Geosyntec Consultants

Sample ID: PZ-2

Collection Date: 1/28/2021 11:35 AM **Matrix:** GROUNDWATER

Work Order: 21020221 **Lab ID:** 21020221-02

Project: DTE- Monroe (GLP-8014) **Client:** Geosyntec Consultants

Sample ID: PZ-2

Collection Date: 1/28/2021 11:35 AM **Matrix:** GROUNDWATER

Work Order: 21020221 **Lab ID:** 21020221-02

Project: DTE- Monroe (GLP-8014) **Client:** Geosyntec Consultants

Sample ID: PZ-3

Collection Date: 1/28/2021 12:20 PM **Matrix:** GROUNDWATER

Work Order: 21020221 **Lab ID:** 21020221-03

Project: DTE- Monroe (GLP-8014) **Client:** Geosyntec Consultants

Sample ID: PZ-3

Collection Date: 1/28/2021 12:20 PM **Matrix:** GROUNDWATER

Work Order: 21020221 **Lab ID:** 21020221-03

Client: Geosyntec Consultants

Project: DTE- Monroe (GLP-8014)

Sample ID: PZ-4

Work Order: 21020221 **Lab ID:** 21020221-04

Collection Date: 1/28/2021 01:15 PM **Matrix:** GROUNDWATER

Project: DTE- Monroe (GLP-8014) **Client:** Geosyntec Consultants

Sample ID: PZ-4

Collection Date: 1/28/2021 01:15 PM **Matrix:** GROUNDWATER

Work Order: 21020221 **Lab ID:** 21020221-04

Client: Geosyntec Consultants

Project: DTE- Monroe (GLP-8014)

Sample ID: PZ-5

Collection Date: 1/28/2021 02:00 PM **Matrix:** GROUNDWATER

Work Order: 21020221 **Lab ID:** 21020221-05

Sample ID: PZ-5

Project: DTE- Monroe (GLP-8014)

Client: Geosyntec Consultants

Work Order: 21020221 **Lab ID:** 21020221-05

Collection Date: 1/28/2021 02:00 PM **Matrix:** GROUNDWATER

ALS Group, USA Date: 11-Feb-21

QC BATCH REPORT

Batch ID: **171771** Instrument ID HG4

Client: Geosyntec Consultants **Work Order:** 21020221

Project: DTE- Monroe (GLP-8014)

QC BATCH REPORT

Batch ID: **171829** Instrument ID **HG4** Method: **SW7470A**

QC BATCH REPORT

Project: DTE- Monroe (GLP-8014)

Batch ID: **171827** Instrument ID **ICPMS3** Method: **SW6020B (Dissolve)**

QC BATCH REPORT

Project: DTE- Monroe (GLP-8014)

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Batch ID: **171827** Instrument ID **ICPMS3** Method: **SW6020B (Dissolve)**

Project: DTE- Monroe (GLP-8014)

Batch ID: **171827** Instrument ID **ICPMS3** Method: **SW6020B (Dissolve)**

Calcium 266.8 5.0 10 267.5 -6.95 75-125 259.6 2.73 20 SO Molybdenum 9.188 0.050 0.1 9.43 -242 75-125 8.941 2.73 20 SO

The following samples were analyzed in this batch: 21020221-01C 21020221-02C 21020221-03C

21020221-04C 21020221-05C

Project: DTE- Monroe (GLP-8014)

Batch ID: **171837** Instrument ID **ICPMS3** Method: **SW6020B**

QC BATCH REPORT

QC BATCH REPORT

Project: DTE- Monroe (GLP-8014)

Batch ID: **171837** Instrument ID **ICPMS3** Method: **SW6020B**

QC BATCH REPORT

Project: DTE- Monroe (GLP-8014)

Batch ID: **171837** Instrument ID **ICPMS3**

Project: DTE- Monroe (GLP-8014)

Batch ID: **171837** Instrument ID **ICPMS3** Method: **SW6020B**

The following samples were analyzed in this batch: 21020221-01A 21020221-02A 21020221-03A

21020221-04A 21020221-05A

Project: DTE- Monroe (GLP-8014)

Batch ID: **171610** Instrument ID **TDS** Method: **A2540 C-11**

QC BATCH REPORT

Project: DTE- Monroe (GLP-8014)

Batch ID: **R309401** Instrument ID IC3 Method: **SW9056A**

QC BATCH REPORT

Batch ID: **R309522** Instrument ID **Titrator 1** Method: **A2320 B-11**

QC BATCH REPORT

Project: DTE- Monroe (GLP-8014)

Batch ID: **R309524** Instrument ID **Titrator 1** Method: **A4500-H B-11**

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.
2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited

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Sample Receipt Checklist

Login Notes:

Eurofins Environmental Testing

Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: Mr. Vincent Buening TRC Environmental Corporation. 1540 Eisenhower Place Ann Arbor, Michigan 48108-7080 Generated 2/27/2023 4:17:01 PM Revision 1

JOB DESCRIPTION

CCR DTE Monroe Fly Ash Basin

JOB NUMBER

240-178047-1

Barberton OH 44203 180 S. Van Buren Avenue Eurofins Canton

Eurofins Canton

Job Notes

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to the NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory. This report is confidential and is intended for the sole use of Eurofins Environment Testing North Central, LLC and its client. All questions regarding this report should be directed to the Eurofins Environment Testing North Central, LLC Project Manager who has signed this report.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing North Central, LLC Project Manager.

Authorization

noohs

Authorized for release by Kris Brooks, Project Manager II Kris.Brooks@et.eurofinsus.com (330)966-9790

Generated 2/27/2023 4:17:01 PM Revision 1

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[5](#page-1738-0)

[8](#page-1748-0)

[9](#page-1763-0)

Qualifiers

Glossary

Job ID: 240-178047-1

Laboratory: Eurofins Canton

Narrative

Job Narrative 240-178047-1

Comments

No additional comments.

Revision

The report being provided is a revision of the original report sent on 12/29/2022. The report (revision 1) is being revised due to: Client would like strontium added to samples 8 through 15..

Receipt

The samples were received on 12/15/2022 8:00 AM. Unless otherwise noted below, the samples arrived in good condition, and where required, properly preserved and on ice. The temperatures of the 2 coolers at receipt time were 1.5° C and 2.0° C.

Receipt Exceptions

Sample MW-16-07 was not received.

Metals

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

General Chemistry

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

Method Summary

Client: TRC Environmental Corporation. Job ID: 240-178047-1 Project/Site: CCR DTE Monroe Fly Ash Basin

Protocol References:

SM = "Standard Methods For The Examination Of Water And Wastewater"

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

EET CAN = Eurofins Canton, 180 S. Van Buren Avenue, Barberton, OH 44203, TEL (330)497-9396

Sample Summary

Client: TRC Environmental Corporation. Job ID: 240-178047-1 Project/Site: CCR DTE Monroe Fly Ash Basin

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Client Sample ID: MW-16-01 Lab Sample ID: 240-178047-1

Client Sample ID: MW-16-02 Lab Sample ID: 240-178047-2

This Detection Summary does not include radiochemical test results.

Client Sample ID: MW-16-03 Lab Sample ID: 240-178047-3

Client Sample ID: MW-16-04 Lab Sample ID: 240-178047-4

This Detection Summary does not include radiochemical test results.

Eurofins Canton

[8](#page-1748-0)

Client Sample ID: MW-16-05 Lab Sample ID: 240-178047-5

Client Sample ID: MW-16-06 Lab Sample ID: 240-178047-6

This Detection Summary does not include radiochemical test results.

RL

Barium 5.0 ug/L5.0 Total

Calcium 1000 ug/L1000 Total

Lithium 8.0 ug/L8.0 Total

Molybdenum 5.0 ug/L5.0 Total

Potassium 23000 1000 1000 ug/L 1 6020 Total

Sodium 1000 ug/L1000 Total

Strontium 12000 10 10 ug/L 1 6020 Total

Alkalinity 260 5.0 5.0 mg/L 1 2320B-1997 Total/NA Carbonate Alkalinity as CaCO3 100 100 5.0 5.0 mg/L 1 2320B-1997 Total/NA Chloride 45 1.0 mg/L1.0 1 9056A Total/NA Fluoride 0.48 0.050 0.050 mg/L 1 9056A Total/NA Sulfate 25 1.0 mg/L1.0 1 9056A Total/NA Total Organic Carbon 11 1.0 0.35 mg/L 1.0 9060A Total/NA TOC Result 1 11 1.0 0.35 mg/L 1 9060A Total/NA TOC Result 2 11 1.0 0.35 mg/L 1 9060A Total/NA TOC Result 3 11 1.0 0.35 mg/L 1 9060A Total/NA TOC Result 4 11 1.0 0.35 mg/L 1 9060A Total/NA

100 ug/L 100 8100 1 6010B

2300 5.0 5.0 ug/L 1 6020

120000 1 6020

16 8.0 8.0 ug/L 1 6020

1400 5.0 5.0 ug/L 1 6020

23000 1000 1000 ug/L 1 6020

52000 1000 1000 ug/L 1 6020

12000 1 6020

MDL

Client: TRC Environmental Corporation. Job ID: 240-178047-1 Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: PZ-1 Lab Sample ID: 240-178047-8

Boron

Analyte Result Qualifier Unit Dil Fac D Method Prep Type

Total

Client Sample ID: PZ-2 Lab Sample ID: 240-178047-9

This Detection Summary does not include radiochemical test results.

Client: TRC Environmental Corporation. **Client: TRC Environmental Corporation**. Project/Site: CCR DTE Monroe Fly Ash Basin

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Client Sample ID: PZ-4 Lab Sample ID: 240-178047-11

This Detection Summary does not include radiochemical test results.

Detection Summary

Client: TRC Environmental Corporation. **All any of the Contract Corporation** Corporation. Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: PZ-4 (Continued) Lab Sample ID: 240-178047-11

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[8](#page-1748-0)

[9](#page-1763-0)

Client Sample ID: P-01 Lab Sample ID: 240-178047-13

This Detection Summary does not include radiochemical test results.

Client: TRC Environmental Corporation. **All any of the Contract Contr** Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: LE-01 Lab Sample ID: 240-178047-14

Client Sample ID: SW-001 Lab Sample ID: 240-178047-15

This Detection Summary does not include radiochemical test results.

Detection Summary

Client: TRC Environmental Corporation. **All any of the Contract Corporation** Corporation. Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: SW-001 (Continued) Lab Sample ID: 240-178047-15

Client Sample ID: DUP-01 Lab Sample ID: 240-178047-16

Client: TRC Environmental Corporation. **All any of the Contract Contr** Project/Site: CCR DTE Monroe Fly Ash Basin

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[9](#page-1763-0)

Client Sample ID: MW-16-01 Lab Sample ID: 240-178047-1

Date Collected: 12/12/22 11:27 Matrix: Water Date Received: 12/15/22 08:00

 \overline{a}

Client: TRC Environmental Corporation. **Client: TRC Environmental Corporation**. Project/Site: CCR DTE Monroe Fly Ash Basin

[5](#page-1738-0)

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[9](#page-1763-0)

Client Sample ID: MW-16-02 Lab Sample ID: 240-178047-2 Matrix: Water

Client: TRC Environmental Corporation. **All any of the Contract Contr** Project/Site: CCR DTE Monroe Fly Ash Basin

Date Received: 12/15/22 08:00

Client Sample ID: MW-16-03 Lab Sample ID: 240-178047-3

Date Collected: 12/12/22 10:20 Matrix: Water

[5](#page-1738-0)

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Client: TRC Environmental Corporation. **Client: TRC Environmental Corporation**. Project/Site: CCR DTE Monroe Fly Ash Basin

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Client Sample ID: MW-16-04 Lab Sample ID: 240-178047-4 Matrix: Water

Client: TRC Environmental Corporation. **All any of the Contract Contr** Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: MW-16-05 Lab Sample ID: 240-178047-5

Date Collected: 12/12/22 09:42 Matrix: Water Date Received: 12/15/22 08:00

Eurofins Canton

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Client: TRC Environmental Corporation. **All any of the Contract Contr** Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: MW-16-06 Lab Sample ID: 240-178047-6

Date Collected: 12/12/22 13:28 Matrix: Water Date Received: 12/15/22 08:00

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Client: TRC Environmental Corporation. **All any of the Contract Contr** Project/Site: CCR DTE Monroe Fly Ash Basin

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Client Sample ID: PZ-1 Lab Sample ID: 240-178047-8

Date Collected: 12/13/22 10:16 Matrix: Water

TOC Result 4 (SW846 9060A) 11 1.0 0.35 mg/L 12/28/22 20:38 1

Client: TRC Environmental Corporation. **All any of the Contract Contr** Project/Site: CCR DTE Monroe Fly Ash Basin

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Client Sample ID: PZ-2 Lab Sample ID: 240-178047-9

Date Collected: 12/12/22 15:38 Matrix: Water Date Received: 12/15/22 08:00

Client: TRC Environmental Corporation. Job ID: 240-178047-1 Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: PZ-3 Lab Sample ID: 240-178047-10

Matrix: Water

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Client: TRC Environmental Corporation. **All any of the Contract Contr** Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: PZ-4 Lab Sample ID: 240-178047-11

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Date Collected: 12/13/22 09:13 Matrix: Water Date Received: 12/15/22 08:00

Client: TRC Environmental Corporation. Job ID: 240-178047-1 Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: PZ-5 Lab Sample ID: 240-178047-12

Matrix: Water

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Client: TRC Environmental Corporation. **All any of the Contract Contr** Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: P-01 Lab Sample ID: 240-178047-13

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Date Collected: 12/13/22 14:51 Matrix: Water Date Received: 12/15/22 08:00

Client: TRC Environmental Corporation. **Client: TRC Environmental Corporation**. Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: LE-01 Lab Sample ID: 240-178047-14

Matrix: Water

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Client: TRC Environmental Corporation. Job ID: 240-178047-1 Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: SW-001 Lab Sample ID: 240-178047-15

Matrix: Water

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Client: TRC Environmental Corporation. Job ID: 240-178047-1 Project/Site: CCR DTE Monroe Fly Ash Basin

Client Sample ID: DUP-01 Lab Sample ID: 240-178047-16

Matrix: Water

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QC Sample Results

Client: TRC Environmental Corporation. Job ID: 240-178047-1 Project/Site: CCR DTE Monroe Fly Ash Basin

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Method: 6020 - Metals (ICP/MS)

 \overline{a}

Method: 6020 - Metals (ICP/MS) (Continued)

Lab Sample ID: MB 240-556258/1-A Client Sample ID: Method Blank Matrix: Water Prep Type: Total Recoverable Analysis Batch: 556606 Prep Batch: 556258 RL MDL $\overline{\text{Sodium}}$ $\overline{\text{Sodium}}$ $\overline{\text{Sodium}}$ $\overline{\text{Sodium}}$ $\overline{\text{Solving}}$ $\overline{\$ **MB MB Analyte Result Qualifier Unit D Prepared Analyzed Dil Fac** Strontium 10 U 10 10 ug/L 12/16/22 12:00 12/19/22 13:29 1 **Lab Sample ID: LCS 240-556258/2-A Client Sample ID: Lab Control Sample Matrix: Water Prep Type: Total Recoverable**

Analysis Batch: 556606 Prep Batch: 556258

Lab Sample ID: 240-178047-1 MS Client Sample ID: MW-16-01

Lab Sample ID: 240-178047-1 MSD Client Sample ID: MW-16-01 Matrix: Water Prep Type: Total Recoverable Analysis Batch: 556606 Prep Batch: 556258

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Prep Type: Total Recoverable Analysis Batch: 556606 Prep Batch: 556258

Method: 6020 - Metals (ICP/MS) (Continued)

Lab Sample ID: MB 240-556526/1-A Client Sample ID: Method Blank Matrix: Water Prep Type: Total Recoverable Analysis Batch: 556813 Prep Batch: 556526

Matrix: Water Prep Type: Total Recoverable Analysis Batch: 556813

Lab Sample ID: LCS 240-556526/3-A Client Sample ID: Lab Control Sample

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Method: 2320B-1997 - Alkalinity, Total

Lab Sample ID: MB 240-556464/109 Client Sample ID: Method Blank Matrix: Water Prep Type: Total/NA Analysis Batch: 556464

Lab Sample ID: MB 240-556464/83 Client Sample ID: Method Blank Matrix: Water Prep Type: Total/NA Analysis Batch: 556464

Lab Sample ID: LCS 240-556464/108 Client Sample ID: Lab Control Sample

Matrix: Water Prep Type: Total/NA Analysis Batch: 556464 Alkalinity 146 140 mg/L 96 86 - 123 **Analyte LCS LCS Result Qualifier Unit D %Rec Spike Added %Rec Limits**

Eurofins Canton

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Method: 2320B-1997 - Alkalinity, Total (Continued)

Lab Sample ID: LCS 240-557247/4 Client Sample ID: Lab Control Sample Matrix: Water Prep Type: Total/NA Analysis Batch: 557247

Lab Sample ID: 240-178047-14 MS Client Sample ID: LE-01 Matrix: Water Prep Type: Total/NA Analysis Batch: 557247

Lab Sample ID: 240-178047-14 MSD Client Sample ID: LE-01 Matrix: Water Prep Type: Total/NA Analysis Batch: 557247

Lab Sample ID: MB 240-557360/3 Client Sample ID: Method Blank Matrix: Water Prep Type: Total/NA

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Method: 9056A - Anions, Ion Chromatography (Continued)

Client: TRC Environmental Corporation. **Client: TRC Environmental Corporation**. Project/Site: CCR DTE Monroe Fly Ash Basin

```
Metals
```
Prep Batch: 556258

Prep Batch: 556526

Analysis Batch: 556606

Prep Batch: 556682

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[10](#page-1768-0)

Metals (Continued)

Prep Batch: 556682 (Continued)

Analysis Batch: 556763

Analysis Batch: 556813

Analysis Batch: 556918

Client: TRC Environmental Corporation. **Client: TRC Environmental Corporation**. Project/Site: CCR DTE Monroe Fly Ash Basin

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Metals

Analysis Batch: 556924

General Chemistry

Analysis Batch: 556464

Analysis Batch: 557247

QC Association Summary

Client: TRC Environmental Corporation. **Client: TRC Environmental Corporation**. Project/Site: CCR DTE Monroe Fly Ash Basin

General Chemistry (Continued)

Analysis Batch: 557247 (Continued)

Analysis Batch: 557360

Analysis Batch: 557515

Batch Number

Prep 3005A 556682 SHB EET CAN

Total Recoverable Prep 3005A 3005A - 556682 SHB EET CAN 12/20/22 12:00 Total Recoverable Analysis 6010B 1 556918 RKT EET CAN 12/21/22 15:18 Total Recoverable Prep 3005A 556258 SHB EET CAN 12/16/22 12:00 Total Recoverable Analysis 6020 1 556606 AJC EET CAN 12/19/22 13:34 Total/NA Analysis 2320B-1997 1 556464 JMR EET CAN 12/17/22 09:23 Total/NA Analysis 9056A 1 557247 JMB EET CAN 12/27/22 21:12 Total/NA Analysis 9056A 10 557247 JMB EET CAN 12/27/22 22:17 Total/NA Analysis 9060A 1 557515 MMS EET CAN 12/28/22 17:08

Dilution Factor

Prep Type Method Run Analyst Lab

Type

Batch Batch

Prepared or Analyzed

Client Sample ID: MW-16-02 Lab Sample ID: 240-178047-2

Date Collected: 12/12/22 14:13 Matrix: Water

Date Received: 12/15/22 08:00

Date Collected: 12/12/22 10:20 Matrix: Water Date Received: 12/15/22 08:00

Prep 3005A 556682 SHB EET CAN **Type Batch Batch Prep Type Method Run Analyst Lab Number Prepared or Analyzed Batch Dilution Factor** Total Recoverable Prep 3005A 3005A 3005A 556682 SHB EET CAN 12/20/22 12:00 Total Recoverable Analysis 6010B 1 556918 RKT EET CAN 12/21/22 15:51 Total Recoverable Prep 3005A 556258 SHB EET CAN 12/16/22 12:00 Total Recoverable Analysis 6020 1 556606 AJC EET CAN 12/19/22 13:57 Total/NA Analysis 2320B-1997 1 556464 JMR EET CAN 12/17/22 09:33 Total/NA Analysis 9056A 1 557247 JMB EET CAN 12/27/22 23:23 Total/NA Analysis 9056A 10 557247 JMB EET CAN 12/27/22 23:44 Total/NA Analysis 9056A 1 557360 JMB EET CAN 12/28/22 22:53 Total/NA Analysis 9060A 1 557515 MMS EET CAN 12/28/22 18:18

Client Sample ID: MW-16-03 Lab Sample ID: 240-178047-3

Type

Batch Batch

Date Received: 12/15/22 08:00

Client Sample ID: MW-16-04 Lab Sample ID: 240-178047-4 Date Collected: 12/12/22 09:04 Matrix: Water

Prepared or Analyzed

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Client Sample ID: MW-16-05 Date Collected: 12/12/22 09:42 Matrix: Water Date Received: 12/15/22 08:00

Prep 3005A 556682 SHB EET CAN

Total Recoverable **Prep 3005A TOTAL TOTAL SECON EET CAN** 12/20/22 12:00 Total Recoverable Analysis 6010B 1 556918 RKT EET CAN 12/21/22 15:55 Total Recoverable Prep 3005A 556258 SHB EET CAN 12/16/22 12:00 Total Recoverable Analysis 6020 1 556606 AJC EET CAN 12/19/22 14:00 Total/NA Analysis 2320B-1997 1 556464 JMR EET CAN 12/17/22 09:37 Total/NA Analysis 9056A 1 557247 JMB EET CAN 12/28/22 00:06 Total/NA Analysis 9056A 10 557247 JMB EET CAN 12/28/22 00:28 Total/NA Analysis 9056A 1 557360 JMB EET CAN 12/28/22 23:14 Total/NA Analysis 9060A 1 557515 MMS EET CAN 12/28/22 18:53

Dilution Factor

Prep Type Method Run Factor Mumber Analyst Lab

Client Sample ID: MW-16-06 Lab Sample ID: 240-178047-6 Date Collected: 12/12/22 13:28 Matrix: Water Date Received: 12/15/22 08:00

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Batch

Batch

Prep 3005A 556682 SHB EET CAN

Total Recoverable **Prep 3005A TOTAL TOTAL SECON EET CAN** 12/20/22 12:00 Total Recoverable Analysis 6010B 1 556918 RKT EET CAN 12/21/22 16:08 Total Recoverable Prep 3005A 556258 SHB EET CAN 12/16/22 12:00 Total Recoverable Analysis 6020 1 556606 AJC EET CAN 12/19/22 14:07 Total/NA Analysis 2320B-1997 1 556464 JMR EET CAN 12/17/22 09:56 Total/NA Analysis 9056A 1 557247 JMB EET CAN 12/28/22 02:59 Total/NA Analysis 9056A 1 557360 JMB EET CAN 12/29/22 00:20 Total/NA Analysis 9060A 1 557515 MMS EET CAN 12/28/22 20:38

Dilution Factor

Prep Type Method Run Factor Mumber Analyst Lab

Type

Batch Batch

Client Sample ID: PZ-1 Lab Sample ID: 240-178047-8

Prepared or Analyzed

Client Sample ID: PZ-2 Lab Sample ID: 240-178047-9

Date Collected: 12/12/22 15:38 Matrix: Water

Date Received: 12/15/22 08:00

Client Sample ID: PZ-3 Lab Sample ID: 240-178047-10 Date Collected: 12/13/22 11:18 Matrix: Water Date Received: 12/15/22 08:00

Client Sample ID: PZ-4 Lab Sample ID: 240-178047-11

Date Collected: 12/13/22 09:13 Matrix: Water Date Received: 12/15/22 08:00

Client Sample ID: PZ-5 Lab Sample ID: 240-178047-12

Date Collected: 12/13/22 13:13 Matrix: Water Date Received: 12/15/22 08:00

Client Sample ID: P-01 Lab Sample ID: 240-178047-13 Date Collected: 12/13/22 14:51 Matrix: Water Date Received: 12/15/22 08:00

Batch

Prep 3005A 556682 SHB EET CAN

Total Recoverable **Prep 3005A TOTAL TOTAL SECON EET CAN** 12/20/22 12:00 Total Recoverable Analysis 6010B 1 556918 RKT EET CAN 12/21/22 16:37 Total Recoverable Prep 3005A 556258 SHB EET CAN 12/16/22 12:00 Total Recoverable Analysis 6020 1 556606 AJC EET CAN 12/19/22 14:19 Total/NA Analysis 2320B-1997 1 556464 JMR EET CAN 12/17/22 10:25 Total/NA Analysis 9056A 1 557247 JMB EET CAN 12/28/22 08:03 Total/NA Analysis 9060A 1 557515 MMS EET CAN 12/29/22 00:30

Dilution Factor

Prep Type Method Run Factor Mumber Analyst Lab

Type

Batch Batch

Client Sample ID: LE-01 Lab Sample ID: 240-178047-14 Date Collected: 12/13/22 15:56 Matrix: Water

Prepared or Analyzed

Client Sample ID: SW-001 Lab Sample ID: 240-178047-15 Date Collected: 12/13/22 12:19 Matrix: Water Date Received: 12/15/22 08:00

Date Received: 12/15/22 08:00

Date Received: 12/15/22 08:00

Client Sample ID: DUP-01 Lab Sample ID: 240-178047-16 Date Collected: 12/12/22 00:00 Matrix: Water

Laboratory References:

EET CAN = Eurofins Canton, 180 S. Van Buren Avenue, Barberton, OH 44203, TEL (330)497-9396

Accreditation/Certification Summary

Client: TRC Environmental Corporation. Job ID: 240-178047-1 Project/Site: CCR DTE Monroe Fly Ash Basin

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Laboratory: Eurofins Canton

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Chain of Custody Record

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Login Container Summary Report

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Login # $:$ _

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WI-NC-099 Cooler Receipt Form Page 2 - Multiple Coolers

Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: Mr. Vincent Buening TRC Environmental Corporation. 1540 Eisenhower Place Ann Arbor, Michigan 48108-7080 Generated 1/4/2023 7:35:16 PM

JOB DESCRIPTION

CCR DTE Monroe FAB

JOB NUMBER

240-178303-1

Barberton OH 44203 180 S. Van Buren Avenue Eurofins Canton

Eurofins Canton

Job Notes

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to the NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory. This report is confidential and is intended for the sole use of Eurofins Environment Testing North Central, LLC and its client. All questions regarding this report should be directed to the Eurofins Environment Testing North Central, LLC Project Manager who has signed this report.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing North Central, LLC Project Manager.

Authorization

 S noohs

Authorized for release by Kris Brooks, Project Manager II Kris.Brooks@et.eurofinsus.com (330)966-9790

Generated 1/4/2023 7:35:16 PM

Table of Contents

Qualifiers

Job ID: 240-178303-1

Laboratory: Eurofins Canton

Narrative

Job Narrative 240-178303-1

Receipt

The sample was received on 12/20/2022 10:00 AM. Unless otherwise noted below, the sample arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 3.0°C

Metals

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

General Chemistry

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Method Summary

Client: TRC Environmental Corporation. Job ID: 240-178303-1 Project/Site: CCR DTE Monroe FAB

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Protocol References:

SM = "Standard Methods For The Examination Of Water And Wastewater"

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

EET CAN = Eurofins Canton, 180 S. Van Buren Avenue, Barberton, OH 44203, TEL (330)497-9396

Client: TRC Environmental Corporation. **All any of the Contract Corporation** Corporation. Project/Site: CCR DTE Monroe FAB

Detection Summary

Client: TRC Environmental Corporation. **All any of the Contract Corporation** Corporation. Project/Site: CCR DTE Monroe FAB

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Client Sample ID: MW-16-07 Lab Sample ID: 240-178303-1

Client Sample Results

Client: TRC Environmental Corporation. **All any of the Contract Corporation** Corporation. Project/Site: CCR DTE Monroe FAB

Client Sample ID: MW-16-07 Lab Sample ID: 240-178303-1

Date Collected: 12/09/22 12:53 Matrix: Water Date Received: 12/20/22 10:00

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Method: 6010B - Metals (ICP)

Method: 6020 - Metals (ICP/MS)

Lab Sample ID: MB 240-556847/1-A Client Sample ID: Method Blank Matrix: Water Prep Type: Total Recoverable Analysis Batch: 557119 Prep Batch: 556847

Lab Sample ID: LCS 240-556847/3-A Client Sample ID: Lab Control Sample Matrix: Water Prep Type: Total Recoverable Analysis Batch: 557119 Prep Batch: 556847

Method: 2320B-1997 - Alkalinity, Total

Lab Sample ID: MB 240-557050/4 Client Sample ID: Method Blank Analysis Batch: 557050

Eurofins Canton

Prep Type: Total/NA

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Method: 2320B-1997 - Alkalinity, Total (Continued) Lab Sample ID: LCS 240-557050/3 Client Sample ID: Lab Control Sample Matrix: Water Prep Type: Total/NA Analysis Batch: 557050 Alkalinity 146 149 mg/L 102 86 - 123 **Analyte LCS LCS Result Qualifier Unit D %Rec Spike Added %Rec Limits Method: 9056A - Anions, Ion Chromatography Lab Sample ID: MB 240-557525/3 Client Sample ID: Method Blank Matrix: Water Prep Type: Total/NA Analysis Batch: 557525 RL MDL** Chloride 1.0 U 1.0 U 1.0 1.0 mg/L 12/30/22 02:25 1 **MB MB Analyte Result Qualifier Unit D Prepared Analyzed Dil Fac** Fluoride 0.050 U 0.050 0.050 mg/L 12/30/22 02:25 1

Lab Sample ID: LCS 240-557525/4 Client Sample ID: Lab Control Sample Matrix: Water Prep Type: Total/NA Analysis Batch: 557525

Sulfate 1.0 U 1.0 1.0 mg/L 12/30/22 02:25 1

Method: 9060A - Organic Carbon, Total (TOC)

TOC Result 1 18.0 mg/L 98 85 - 115

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Metals

Prep Batch: 556847

General Chemistry

Analysis Batch: 557050

Analysis Batch: 557525

Analysis Batch: 557788

Batch Number

Prep 3005A 556847 SHB EET CAN

Total Recoverable Prep 3005A 3005A 556847 SHB EET CAN 72/21/22 12:00 Total Recoverable Analysis 6010B 1 557096 RKT EET CAN 12/23/22 04:36 Total Recoverable Prep 3005A 556847 SHB EET CAN 12/21/22 12:00 Total Recoverable Analysis 6020 1 557119 AJC EET CAN 12/22/22 16:51 Total/NA Analysis 2320B-1997 1 557050 JWW EET CAN 12/21/22 20:43 Total/NA Analysis 9056A 1 557525 JMB EET CAN 12/30/22 12:01 Total/NA Analysis 9056A 10 557525 JMB EET CAN 12/30/22 12:23 Total/NA Analysis 9060A 1 557788 MMS EET CAN 12/29/22 21:24

Dilution Factor

Type

Batch Batch

Date Collected: 12/09/22 12:53 Matrix: Water Date Received: 12/20/22 10:00

Client Sample ID: MW-16-07 Lab Sample ID: 240-178303-1

Prepared or Analyzed

Laboratory References:

EET CAN = Eurofins Canton, 180 S. Van Buren Avenue, Barberton, OH 44203, TEL (330)497-9396

Prep Type Method Run Analyst Lab

Client: TRC Environmental Corporation. Job ID: 240-178303-1 Project/Site: CCR DTE Monroe FAB

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Laboratory: Eurofins Canton

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Login Container Summary Report

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ALS Scandinavia

ANALYSIS REPORT

Comments

* - Li content is too low for precise measurement

Comments

The analysis is carried out by MC-ICP-MS (NEPTUNE Plus) using internal standartization

and external calibration with bracketing isotope SRMs

Analysis is carried out after ion exchange separation

Li delta value calculated against LSVEC NIST 8545 RM

Boron delta values calculated to NIST SRM 951 RM

SD calculated from two independent consequintive measurements

* - Li content is too low for precise measurement

The Rochler Signature

Ilia Rodushkin **Associate Professor LABORATORY MANAGER ALS Scandinavia AB**

Waterloo EIL

Client: Buening/TRC

ISO# 2022713 Location: C4 16 for 18O, 2H

Project: Monroe Fly Ash Basin

Miami Tritium Laboratory

UNIVERSITY OF MIAMI

Rosenstiel School of Marine, Atmospheric, and Earth Science Tritium Laboratory

4600 Rickenbacker Causeway Miami, FL 33149-1031

P: 305-421-4100 F: 305-421-4112 tritium@miami.edu

March 14, 2023

TRITIUM LABORATORY

Data Release #23-012 Job # 4255

> TRC Companies TRITIUM SAMPLES

> > j. Dr. James D. Happell Associate Research Professor

Distribution: Vince Buening 1540 Eisenhower Place Ann Arbor, MI 48108 vbuening@trccompanies.com

Tritium Scale New Half-life

 Tritium concentrations are normally expressed in TU, where 1 TU indicates a T/H abundance ratio of 10^{-18} . The values refer to the tritium scale recommended by U.S. National Institute of Science and Technology (NIST, formerly NBS), and International Atomic Energy Agency (IAEA). The TU-numbers are based on the NIST tritium water standard #4926E. Age corrections and conversions are made using the recommended half-life of **12.32 years**, i.e., a decay rate of $\lambda = 5.626$ year⁻¹. In this scale, 1 TU is equivalent to 7.151 dpm/kg H2O, or 3.222 pCi/kg H2O, (equivalent to pCi/L in freshwater) or 0.1192 Bq/kg H2O (Bq = disint/sec). We can also express tritium concentrations in pCi/L upon client request.

 Tritium concentrations in TU or pCi/L are calculated for date of sample collection, REFDATE in the table, as provided by the submitter. If no such date is available, date of sample arrival at our laboratory is used.

 The stated errors, eTU or err, are one standard deviation (1 sigma) including all conceivable contributions. In the table, QUANT is quantity of sample received, and ELYS is the amount of water taken for electrolytic enrichment. DIR means direct run (no enrichment).

Very low tritium values

 In some cases, negative tritium values are listed. Such numbers can occur because the net tritium count rate is, in principle the difference between the count rate of the sample and that of a tritium-free sample (background count or blank sample). Given a set of "unknown" samples with no tritium, the distribution of net results should become symmetrical around 0 TU or pCi/L. The negative values are reported as such for the benefit of allowing the user unbiased statistical treatment of sets of the data. For other applications, 0 TU or pCi/L should be used.

Additional information

 Refer to Services Rendered (Tritium), Section II.8, in the "Tritium Laboratory Price Schedule; Procedures and Standards; Advice on Sampling", and our Web-site [www.rsmas.miami.edu/groups/tritium.](http://www.rsmas.miami.edu/groups/tritium)

 Tritium efficiencies and background values are somewhat different in each of the nine counters and values are corrected for cosmic intensity, gas pressure and other parameters. For tritium, the efficiency is typically 1.00 cpm per 100 TU (direct counting). At 50× enrichment, the efficiency is equivalent to 1.00 cpm per 2.4 TU. The background is typically 0.3 cpm, known to about ± 0.02 cpm. Our reported results include not only the Poisson statistics, but also other experimental uncertainties such as enrichment error, etc.

Appendix B Statistical Results

L i t h i u m T w o s a m p l e t T e s t (4 / 7 / 2 0 2 3 1 1 : 5 5 : 4 7) Lithium Two sample t Test (4/7/2023 11:55:47)
Descriptive Statistics

Standard Error of Mean (SEM) of difference is computed under the condition that equal variance is assumed.

Null Hypothesis: mean1-mean2 <= 0

Alternative Hypothesis: mean1-mean2 > 0

At 0.05 level, when equal variance is assumed, Mean1 - Mean2 is NOT significantly greater than 0 At 0.05 level, when equal variance is NOT assumed, Mean1 - Mean2 is NOT significantly greater than 0

Oxygen Two sample t Test (4/7/2023 11:57:22)
Descriptive Statistics Oxygen Two sample t Test (4/7/2023 11:57:22)
Descriptive Statistics

Standard Error of Mean (SEM) of difference is computed under the condition that equal variance is assumed.

Null Hypothesis: mean1-mean2 <= 0

Alternative Hypothesis: mean1-mean2 > 0

At 0.05 level, when equal variance is assumed, Mean1 - Mean2 is significantly greater than 0 At 0.05 level, when equal variance is NOT assumed, Mean1 - Mean2 is significantly greater than 0

Hydrogen Two sample t Test (4/7/2023 11:56:57)
Descriptive Statistics *Hydrogen Two sample t Test (4/7/2023 11:56:57)*
Descriptive Statistics

Standard Error of Mean (SEM) of difference is computed under the condition that equal variance is assumed.

Null Hypothesis: mean1-mean2 <= 0

Alternative Hypothesis: mean1-mean2 > 0

At 0.05 level, when equal variance is assumed, Mean1 - Mean2 is significantly greater than 0 At 0.05 level, when equal variance is NOT assumed, Mean1 - Mean2 is significantly greater than 0

Strontium Two sample t Test (4/7/2023 11:56:42)
Descriptive Statistics *Strontium Two sample t Test (4/7/2023 11:56:42)*
Descriptive Statistics

Standard Error of Mean (SEM) of difference is computed under the condition that equal variance is assumed.

Null Hypothesis: mean1-mean2 <= 0

Alternative Hypothesis: mean1-mean2 > 0

At 0.05 level, when equal variance is assumed, Mean1 - Mean2 is significantly greater than 0 At 0.05 level, when equal variance is NOT assumed, Mean1 - Mean2 is significantly greater than 0

Boron Two sample t Test (4/7/2023 11:56:19)
Descriptive Statistics *Boron Two sample t Test (4/7/2023 11:56:19)*
Descriptive Statistics

Standard Error of Mean (SEM) of difference is computed under the condition that equal variance is assumed.

Null Hypothesis: mean1-mean2 >= 0

Alternative Hypothesis: mean1-mean2 < 0

At 0.05 level, when equal variance is assumed, Mean1 - Mean2 is significantly less than 0 At 0.05 level, when equal variance is NOT assumed, Mean1 - Mean2 is significantly less than 0