

Sent via email

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

RE: Alternate Liner Demonstration Extension Request Due to Analytical Limitations DTE Electric Company Monroe Power Plant Fly Ash Basin Coal Combustion Residuals Unit 7955 East Dunbar Road, Monroe, Michigan

Dear Administrator Regan:

In accordance with 40 C.F.R. §257.71(d)(2)(ii)(A) the DTE Electric Company (DTE Electric) is submitting this extension request to the U.S. Environmental Protection Agency (EPA) for approval. Specifically, this request is to extend the November 30, 2021, deadline to submit an Alternate Liner Demonstration for the Monroe Power Plant Fly Ash Basin due to analytical limitations.

The enclosed memorandum prepared by Geosyntec and Excel Geotechnical Testing laboratory provides the information requested by the rule, a date by which termination criteria are anticipated to be achieved, along with a discussion of results, and how the anticipated dates are estimated. The memorandum demonstrates how DTE Electric qualifies for and should be granted the requested extension to submit an Alternate Liner Demonstration after November 30, 2021.

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,

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

Enclosure

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



Memorandum

Date:	September 1, 2021
To:	Michael Regan (USEPA)
Copies to:	Richard Huggins, Mary Jackson, Michelle Long, and Jason Mills (USEPA), Christopher Scieszka (DTE Electric Company), John Seymour (Geosyntec Consultants)
From:	Omer Bozok, P.E. (Geosyntec Consultants), Nader Rad, P.E. (Excel Geotechnical Testing)
Subject:	Extension Request for Monroe Power Plant Fly Ash Basin Alternative Liner Demonstration Geosyntec Project: GLP8014

This technical memorandum has been prepared to request an extension for the Alternative Liner Demonstration (ALD) of the Monroe Fly Ash Basin in accordance with 40 CFR Part 257 (CCR Rule) as amended on November 20, 2020. Specifically, this request is being made in accordance with 40 CFR Part 257.71(d)(2)(ii)(A) *Extension due to analytical limitations*. This memorandum provides the basis and information required by the CCR Rule for the extension request and serves as the written certification from the lab.

BACKGROUND

DTE Electric Company (DTE) submitted the ALD application to the United States Environmental Protection Agency (USEPA) on November 30, 2020, in accordance with the CCR Rule. USEPA has not commented on the ALD application.

DTE took an expeditious approach and initiated the field and laboratory investigation to support the ALD in December 2020. The field investigation was completed in December 2020. The laboratory study is still underway and expected to last for the foreseeable future until the requirements of the CCR Rule are met, as demonstrated in this extension request.

The CCR Rule requires that representative samples from the site are tested for hydraulic conductivity with site-specific contact water and that the tests last until chemical equilibrium is

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reached. If chemical equilibrium is not reached within a reasonable time to complete the ALD, it is considered an "analytical limitation" and the CCR Rule gives the ALD applicant the right to request an extension.

The CCR Rule [§257.71(d)(2)(ii)(A)] states:

"Extension due to analytical limitations. If the owner or operator cannot meet the demonstration deadline due to analytical limitations related to the measurement of hydraulic conductivity, the owner or operator must submit a request for an extension no later than September 1, 2021, that includes a summary of the data that have been analyzed to date for the samples responsible for the delay and an alternate timeline for completion that has been certified by the laboratory. The extension request must include all of the following:

(1) A timeline of fieldwork to confirm that samples were collected expeditiously;

(2) A chain of custody documenting when samples were sent to the laboratory;

(3) Written certification from the lab identifying how long it is projected for the tests to reach the relevant termination criteria related to solution chemistry, and

(4) Documentation of the progression towards all test termination metrics to date."

The remainder of this memorandum provides the information necessary to address the CCR Rule extension requirements. The following are provided:

- Field and laboratory investigation timeline and chain of custody;
- Termination criteria used for hydraulic conductivity testing;
- Documentation of test results as of August 20, 2021, and projected timeline for reaching termination criteria; and
- Laboratory certification.

FIELD AND LABORATORY INVESTIGATION TIMELINE

DTE Electric Company retained Geosyntec to develop and implement a detailed field and laboratory investigation plan soon after the ALD application was submitted to USEPA. The field investigation portion of the study started on December 1, 2020, one day after the ALD application was submitted to USEPA, and was completed on December 8, 2020. Soil samples collected during the field investigation were sent to Excel Geotechnical Testing (EGT) immediately, and samples

were registered by EGT on December 10, 2020. The chain of custody (proof of shipping and delivery) documenting when samples were sent to the laboratory is provided in Appendix A. Sample identification was provided to EGT at the time of shipment. Testing details for each sample were provided to EGT after Geosyntec reviewed the field investigation results in more detail. The testing program is provided in Appendix B.

TERMINATION CRITERIA FOR HYDRAULIC CONDUCTIVITY TESTING

Hydraulic conductivity testing is being conducted in general accordance with ASTM D7100 -Standard Test Method for Hydraulic Conductivity Compatibility Testing of Soils with Aqueous Solutions, using site-specific contact water. 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 considered steady if four or more consecutive hydraulic conductivity determinations fall within ±25 % or better of the mean value for hydraulic conductivity, k ≥ 3 x 10-8 cm/s or within ±50 % or better for k < 1 x 10-8 cm/s, and a plot or tabulation of the hydraulic conductivity versus time shows no significant upward or downward trend;
- At least 2 pore volumes (PV) of flow has 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.

TEST RESULTS & PROJECTED TIMELINE FOR TERMINATION CRITERIA

Preliminary results as of August 20, 2021, are provided in **Appendix A** and summarized in **Table 1**. The table provides the 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. The information further demonstrates the laboratory testing was initiated expeditiously.

In addition, a set of figures created for each sample provide 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.

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 0.49 to 3.30. 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 in the beginning of September 2021 and early 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.

Table 2 provides figure numbers for quick access to the various plots listed above.

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**. 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. Consequently, a request for an extension is being made.

EC values are provided in **Table 4.** In general, the average EC of inflow ranges from 4,522 to 4,840, and the average EC of outflow ranges from 1,126 to 2,059. 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 5 summarizes if the 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. Note that results do not include inflow vs outflow data. The main reason is that the project team had decided to keep the inflow constant, which provides a more stable hydraulic gradient across the sample, more accurate estimation of k, faster testing, and more control in the testing procedure. It is our judgment that the inflow/outflow criterion would be reached by the time other criteria are reached.

CONCLUSION

Considering the data presented above, we are requesting an extension until November 2, 2023. This date may or may not capture the EC termination criterion.

It is Geosyntec's opinion that chemical diffusion is the driving mechanism for contaminant transport, not advective flow, based on the fate and transport analyses we conducted as part of the ongoing ALD. The test data indicate stable hydraulic conductivities for all samples. Therefore, to examine the potential effects of a degraded (increased) hydraulic conductivity, Geosyntec performed a sensitivity analysis, where the Darcy velocity values were increased by an order magnitude over the baseline value to assess the impact on the fate and transport analyses. The baseline Darcy velocity was calculated utilizing a hydraulic conductivity value of 1.4E-08 cm/s, which is the sample from this study with the highest hydraulic conductivity. The model yielded groundwater concentrations that were between one to four orders of magnitude less than the groundwater protection standards. Consequently, the preliminary data and modeling indicate that 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 Darcy velocities/hydraulic conductivities.

LABORATORY CERTIFICATION

The hydraulic conductivity compatibility testing for the Monroe Power Plant Fly Ash Basin samples is projected to last through November 2, 2023, based on results as of August 20, 2021, to meet termination criteria, with the exception of EC criterion as explained in the memorandum. If the extension is granted, DTE will submit the completed demonstration within 45 days of November 2, 2023, in accordance with §257.71(d)(2)(ii)(B).

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Nader Rad, PhD., P.E. (14) President, Excel Geotechnical Testing

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TABLES

ID	Date	Days After Injection	Permeability (cm/s)	Pore Volumes Passed After Injection	Days to Target Pore Volume	Date of Target PV Reached
	February 19, 2021	0	5.9E-09	0.0000		
B2-ST-1 (20-22')	August 20, 2021	182	5.4E-09	1.0116	178	February 13, 2022
D4 ST 2 (40 42)	February 26, 2021	7	3.6E-09	0.0176		
B4-ST-2 (40-42')	August 20, 2021	182	3.5E-09	0.4894	560	March 3, 2023
$D_{A} ST_{A} (70, 72, 5)$	February 26, 2021	7	1.4E-08	0.1220		
B4-ST-4 (70-72.5')	August 20, 2021	182	1.1E-08	2.7318	Complete	July 2, 2021
D(ST 1 (25 27))	February 19, 2021	0	9.7E-09	0.0000		
B6-ST-1 (25-27')	August 20, 2021	182	7.6E-09	1.2755	103	December 1, 2021
D(ST 2 (55 57 51)	February 19, 2021	0	1.2E-08	0.0000		
B6-ST-3 (55-57.5')	August 20, 2021	182	9.8E-09	1.8601	14	September 2, 2021
$\mathbf{D}(\mathbf{ST} A ((5 (7 5))$	February 26, 2021	7	1.3E-08	0.1209		
B6-ST-4 (65-67.5')	August 20, 2021	182	1.0E-08	2.5584	Complete	July 12, 2021
B9-ST-2 (40-42')	February 19, 2021	0	1.1E-08	0.0000		
	August 20, 2021	182	1.1E-08	1.8013	20	September 9, 2021
D0 ST 2 (55 571)	March 19, 2021	28	1.7E-08	0.5500		
B9-ST-3 (55-57')	August 20, 2021	182	1.4E-08	3.3033	Complete	June 10, 2021

 Table 1. Hydraulic Conductivity Summary

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ID	PV of flow with Time	Hydraulic Conductivity with Time	Hydraulic Conductivity with PV	pH of inflow and outflow with time	Electrical conductivity (EC) with time
B2-ST-1 (20-22')	Figure 1	Figure 2	Figure 3	Figure 4	Figure 5
B4-ST-2 (40-42')	Figure 6	Figure 7	Figure 8	Figure 9	Figure 10
B4-ST-4 (70-72.5')	Figure 11	Figure 12	Figure 13	Figure 14	Figure 15
B6-ST-1 (25-27')	Figure 16	Figure 17	Figure 18	Figure 19	Figure 20
B6-ST-3 (55-57.5')	Figure 21	Figure 22	Figure 23	Figure 24	Figure 25
B6-ST-4(65.67.5')	Figure 26	Figure 27	Figure 28	Figure 29	Figure 30
B9-ST-2(40-42')	Figure 31	Figure 32	Figure 33	Figure 34	Figure 35
B9-ST-3(55-57')	Figure 36	Figure 37	Figure 38	Figure 39	Figure 40

Table 2: Summary of Figures for Submitted Graphical Displays

Sample ID	Parameter	pH Inflow	pH Outflow	Is pH of outflow within termination boundaries?	Approximate Projected Termination Date	
	Min	12.3	8.2			
B2-ST-1 (20-22')	Max	12.9	8.9	No	November 2, 2023	
	Average	12.7	8.5			
	Min	12.4	8.2			
B4-ST-2 (40-42')	Max	12.9	8.6	No	March 29, 2023	
	Average	12.7	8.5			
	Min	12.3	8.0			
B5-ST-4 (70-72.5')	Max	13.1	8.9	No	May 4, 2023	
	Average	12.7	8.6			
	Min	12.4	8.2			
B6-ST-1 (25-27')	Max	13.2	8.9	No	December 5, 2022	
	Average	12.8	8.5			
	Min	12.4	8.0		July 2, 2022	
B6-ST-3 (55-57.5')	Max	13.0	8.9	No		
	Average	12.7	8.5			
	Min	12.3	7.8		November 1, 2022	
B6-ST-4(65.67.5')	Max	13.0	8.7	No		
	Average	12.7	8.3			
	Min	12.3	7.9			
B9-ST-2(40-42')	Max	13.0	9.0	No	October 10, 2022	
	Average	12.7	8.6			
	Min	12.2	7.9			
B9-ST-3(55-57')	Max	13.2	9.0	No	June 14, 2023	
	Average	12.7	8.5			

Table 3: Summary of pH Results

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Sample ID	Parameter	EC Inflow (µs/cm)	EC Outflow (µs/cm)	Is EC of outflow within termination boundaries?	Approximate Projected Termination Date
	Min	4300	1434		
B2-ST-1 (20-22')	Max	4800	3000	No	N/A
	Average	4553	2059		
	Min	4840	1126		
B4-ST-2 (40-42')	Max	4840	1126	No	N/A
	Average	4840	1126		
	Min	4120	1082		
B5-ST-4 (70-72.5')	Max	5230	1534	No	N/A
	Average	4650	1211		
	Min	4370	1000		N/A
B6-ST-1 (25-27')	Max	5040	1614	No	
	Average	4735	1384		
	Min	4350	1128	No	N/A
B6-ST-3 (55-57.5')	Max	4900	1683		
	Average	4730	1342		
	Min	3970	963	No	N/A
B6-ST-4(65.67.5')	Max	5090	1708		
	Average	4522	1201		
	Min	4380	1025		N/A
B9-ST-2(40-42')	Max	4940	1796	No	
	Average	4692	1232		
	Min	4230	885		
B9-ST-3(55-57')	Max	5080	2430	No	N/A
	Average	4811	1378		

Table 4. Electrical Conductivity Results

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	Termination Criterion Reached					
Sample ID	Pore Volumes Passed, PV	рН	Electrical Conductivity, EC	Approximate Projected Termination Date	Date Based On	
B2-ST-1 (20-22')	No	No	No	November 2, 2023	pH	
B4-ST-2 (40-42')	No	No	No	March 29, 2023	pH	
B4-ST-4 (70-72.5')	Yes	No	No	May 15, 2023	pH	
B6-ST-1 (25-27')	No	No	No	December 5, 2022	pH	
B6-ST-3 (55-57.5')	No	No	No	July 2, 2022	pH	
B6-ST-4(65.67.5')	Yes	No	No	November 1, 2022	pH	
B9-ST-2(40-42')	No	No	No	October 10, 2022	pH	
B9-ST-3(55-57')	Yes	No	No	March 19, 2023	рН	

Table 5. Summary of Termination Criteria

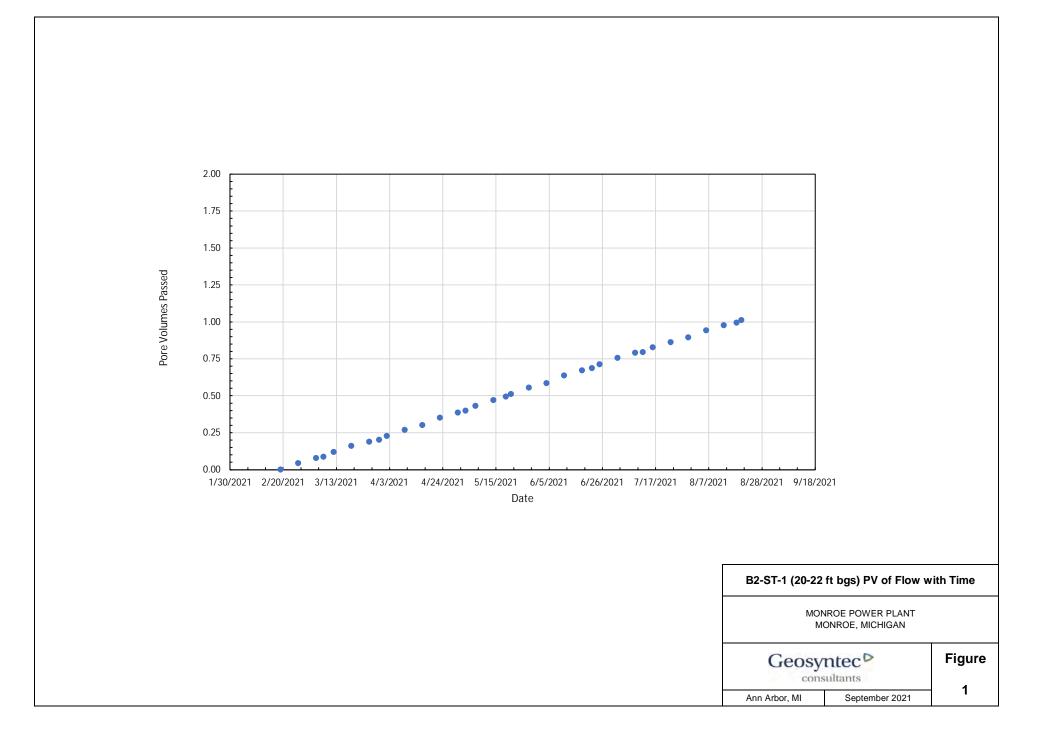
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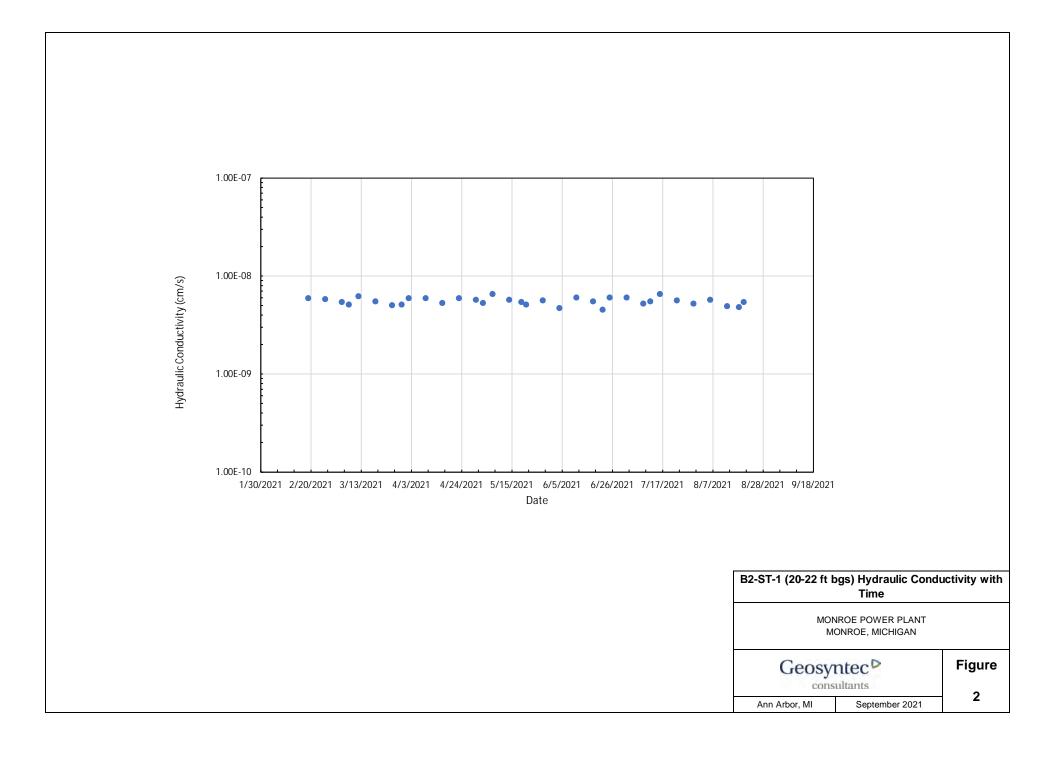


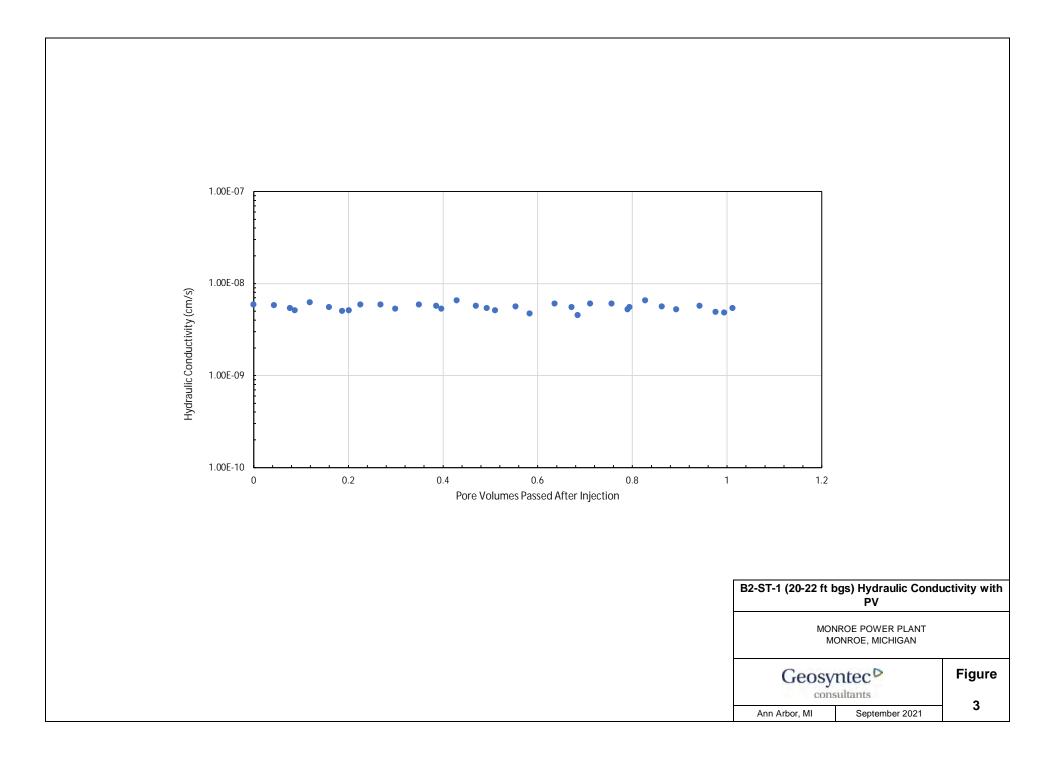
FIGURES

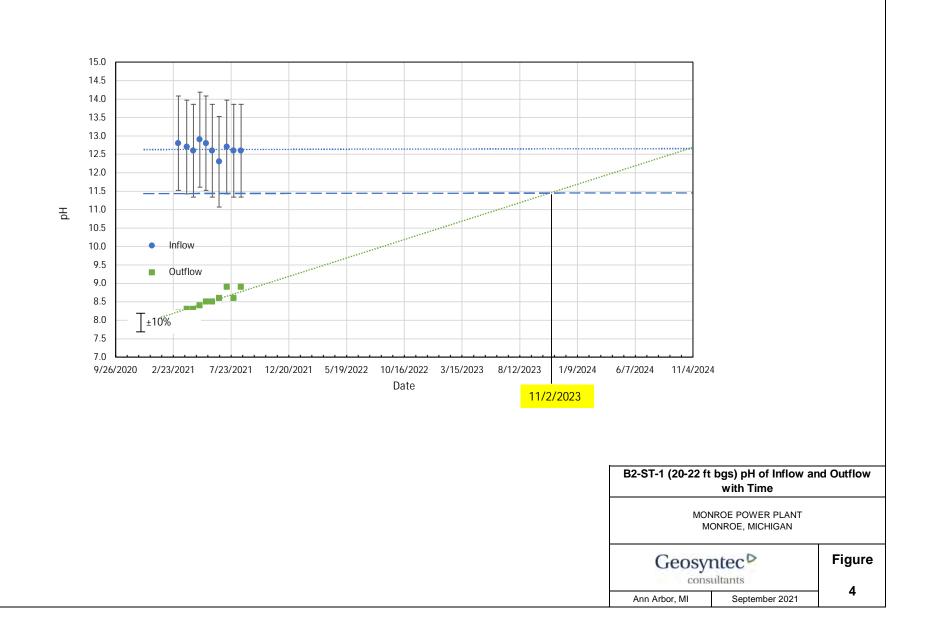
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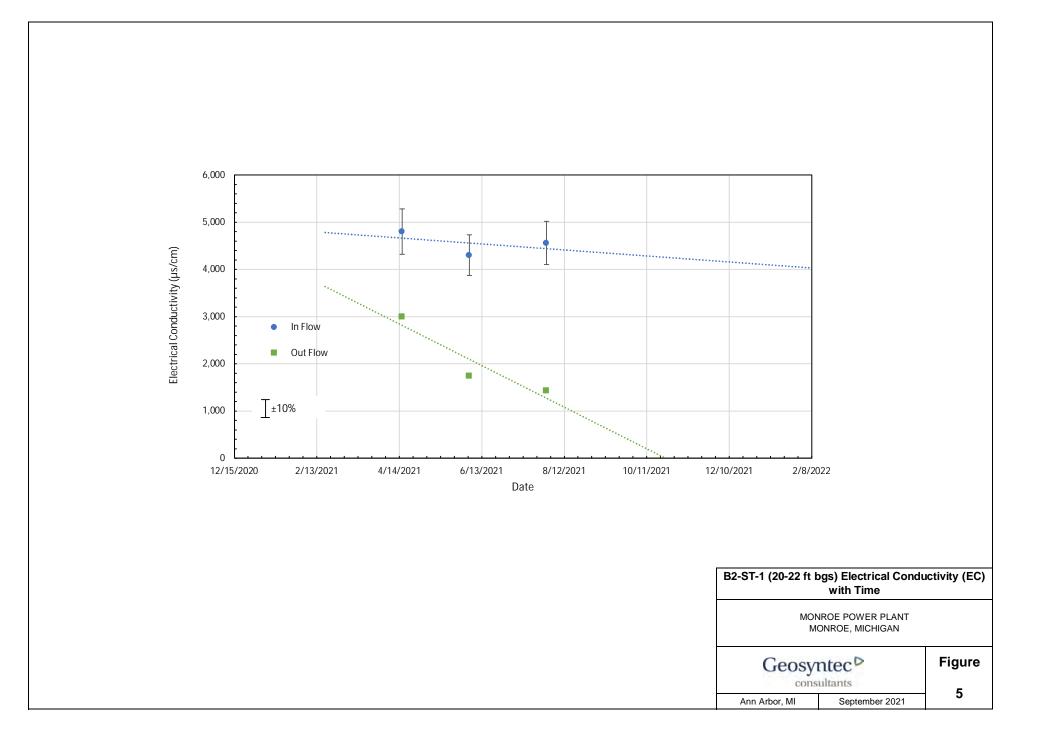
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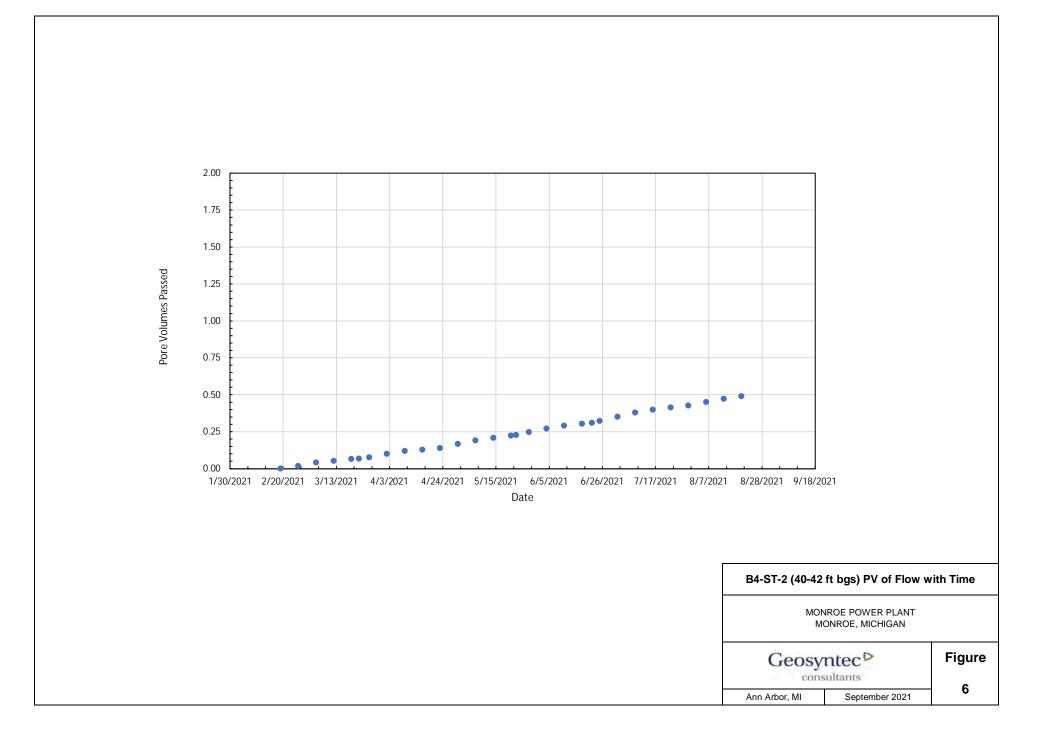


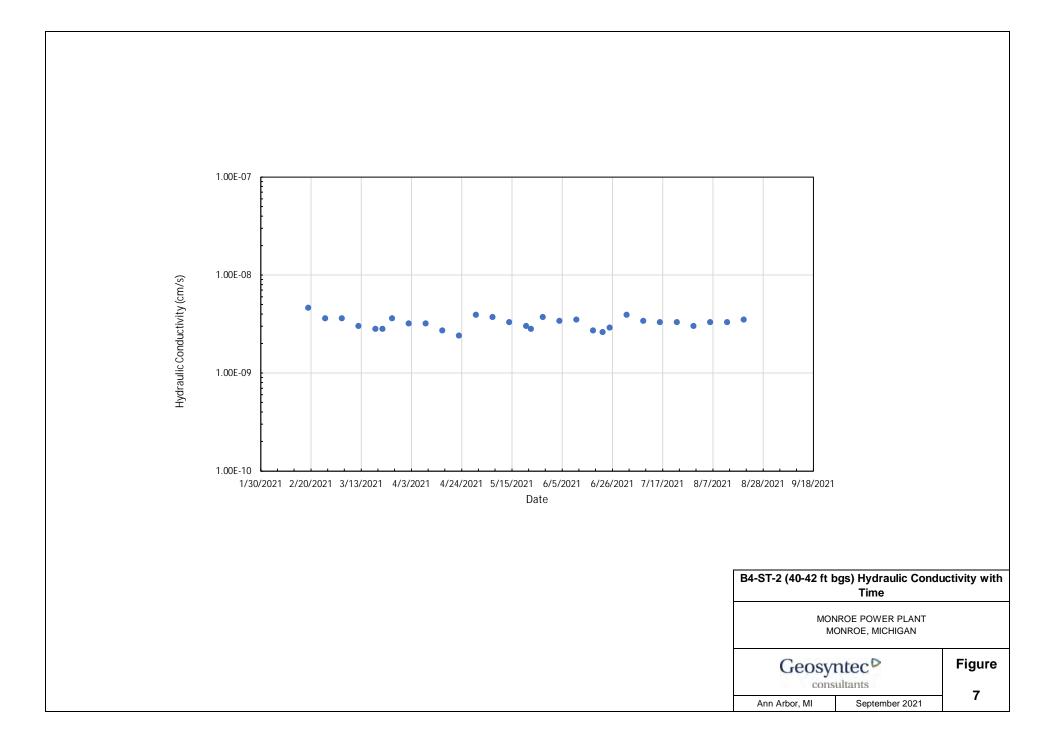


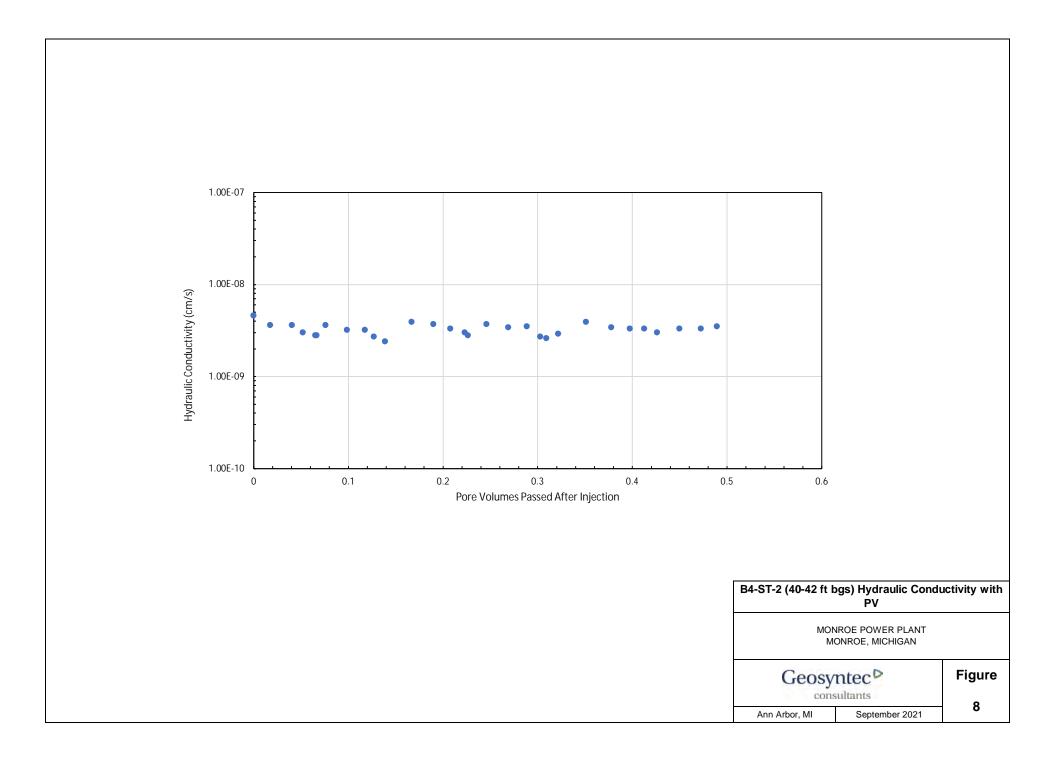


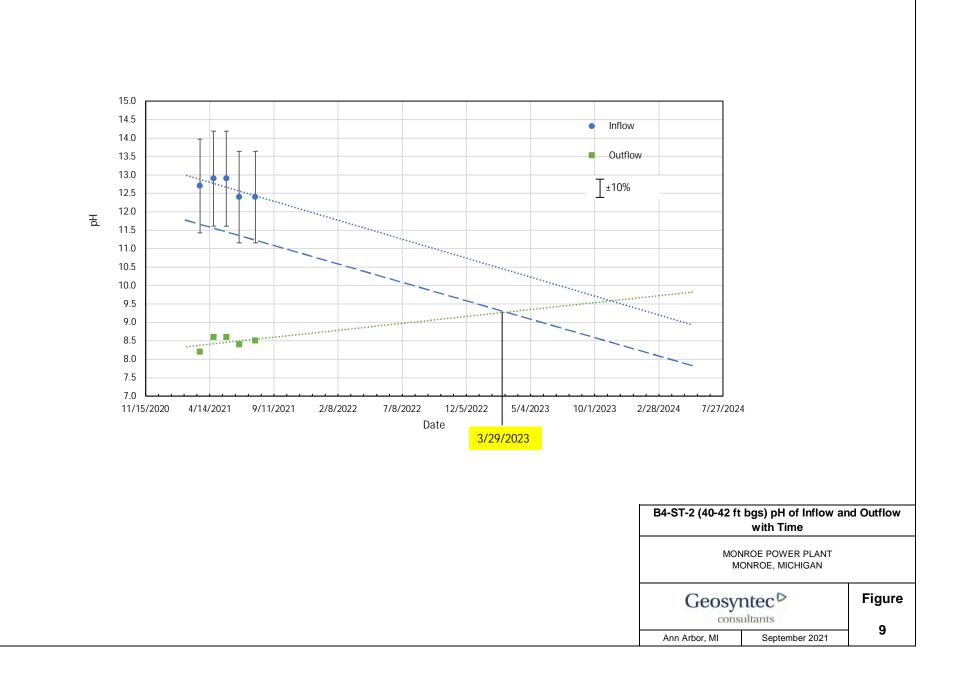


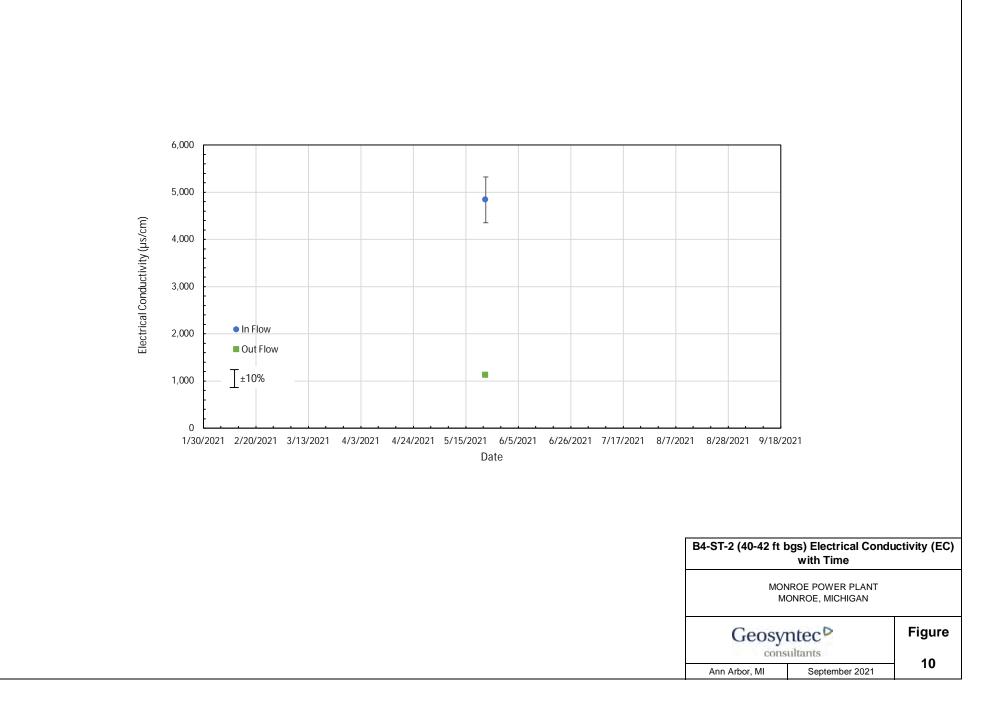


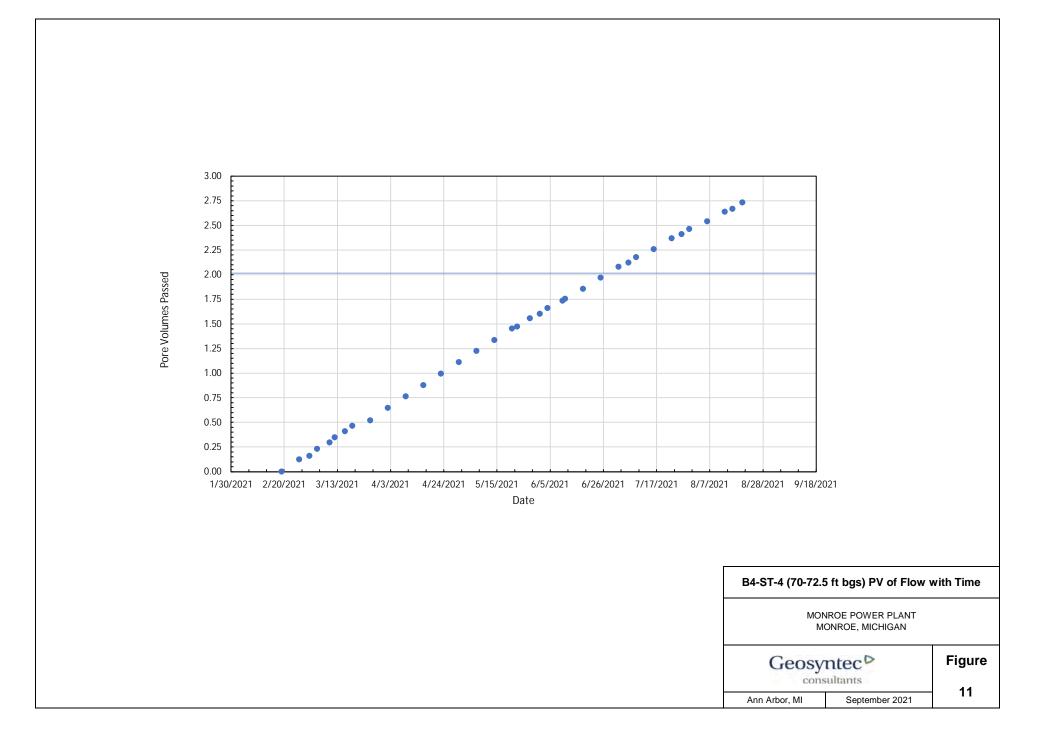


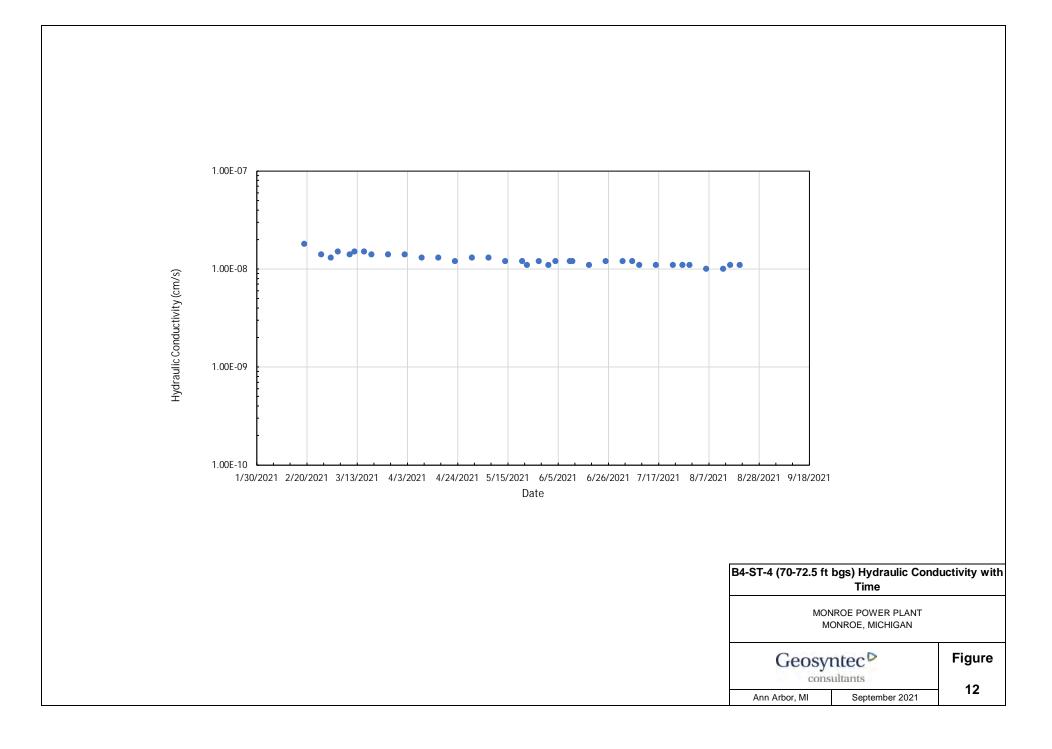


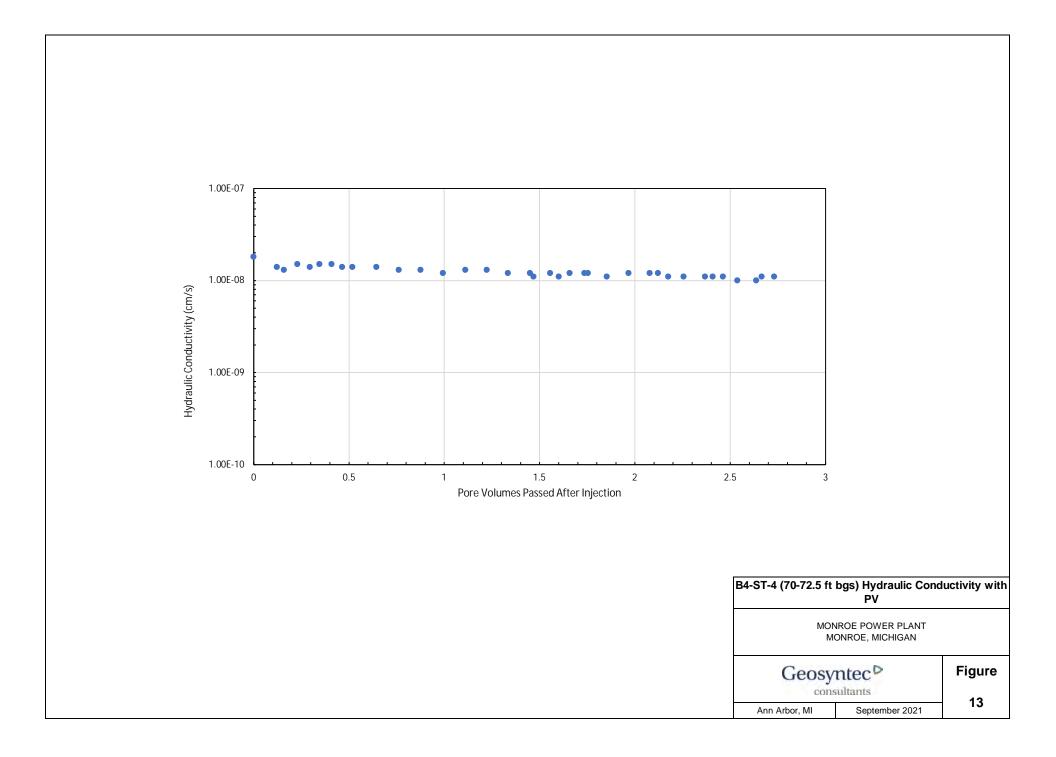


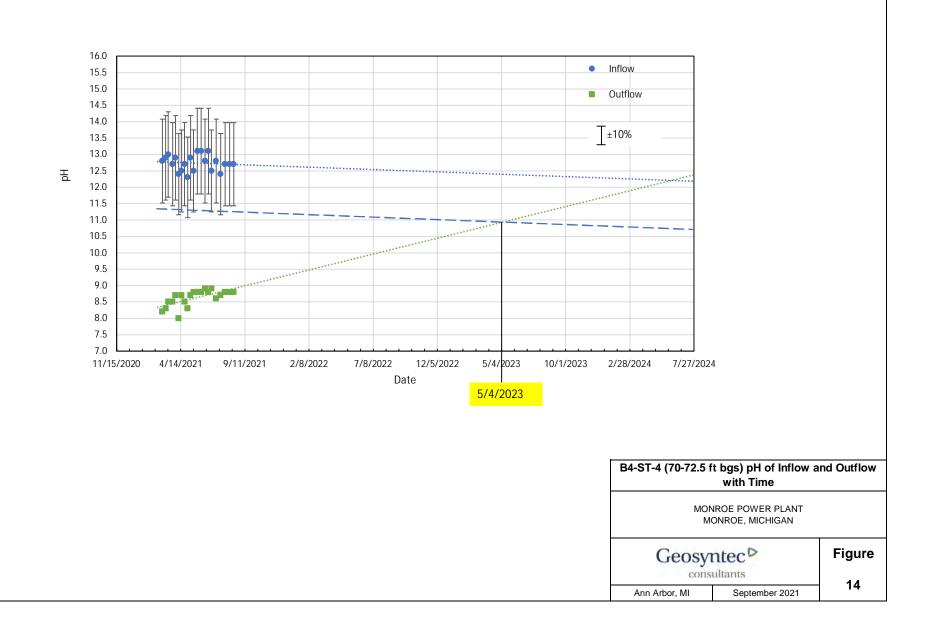


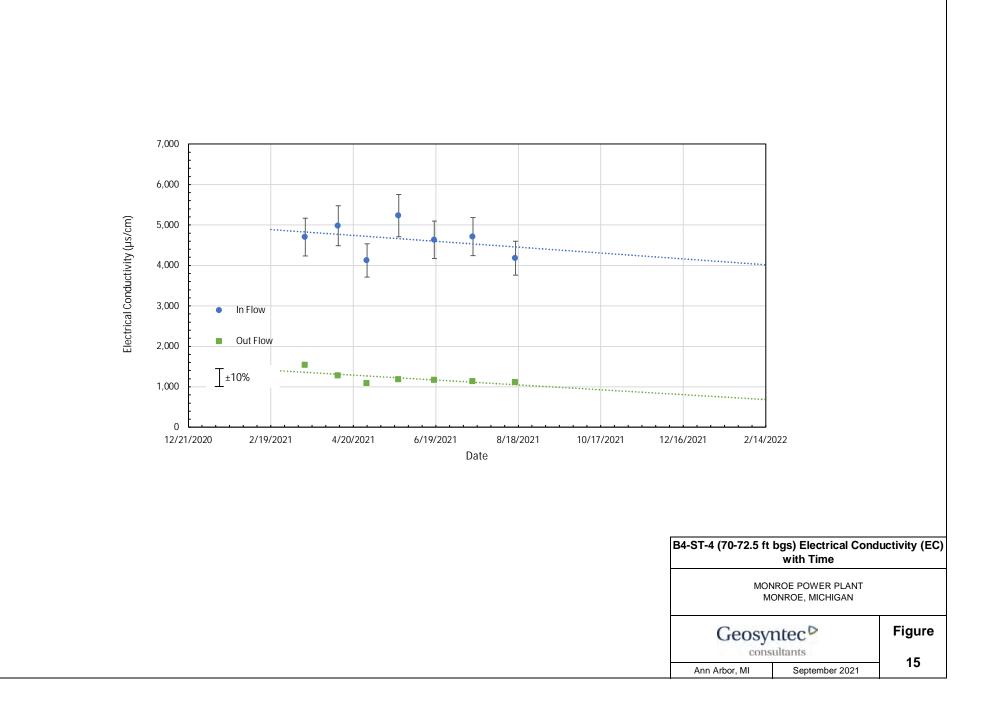


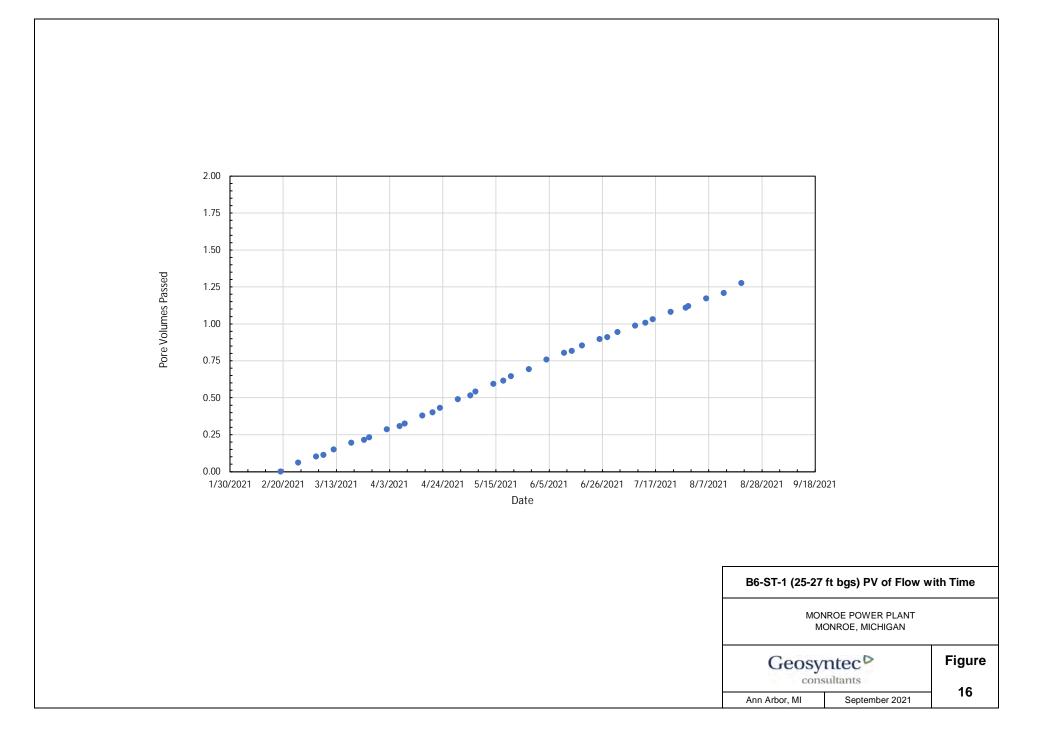


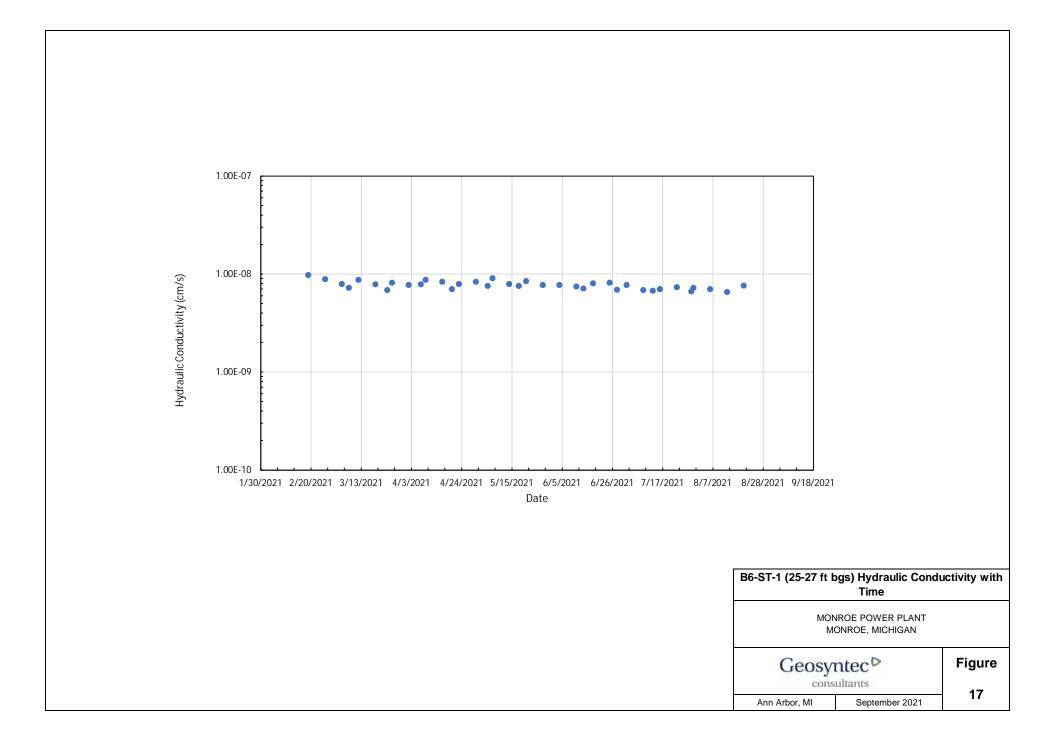


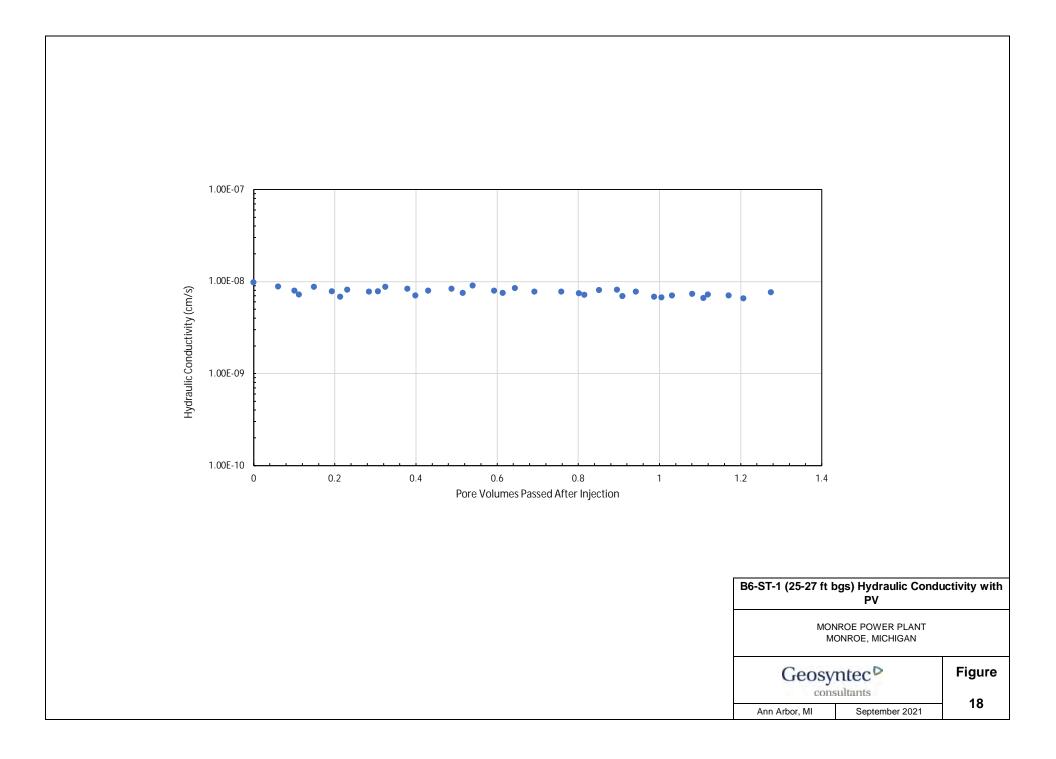


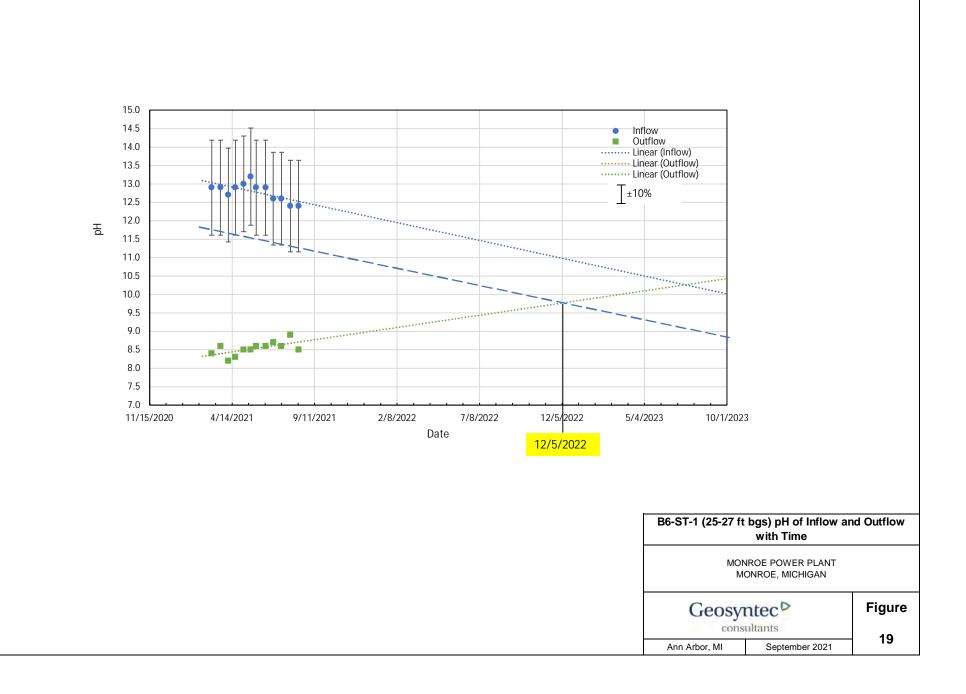


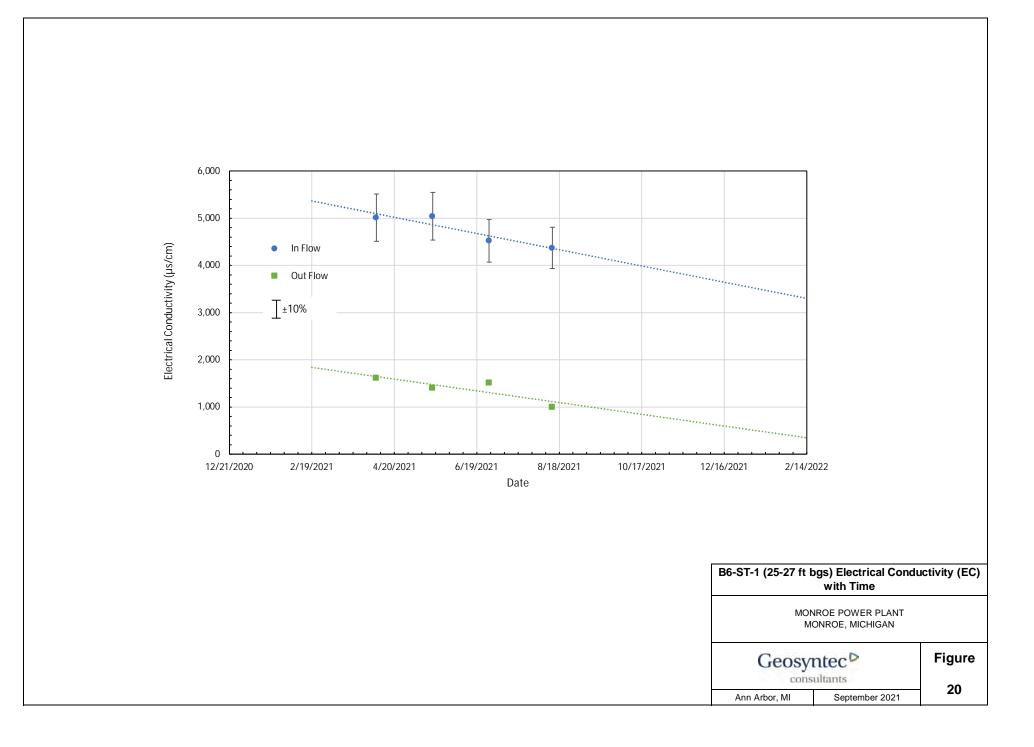


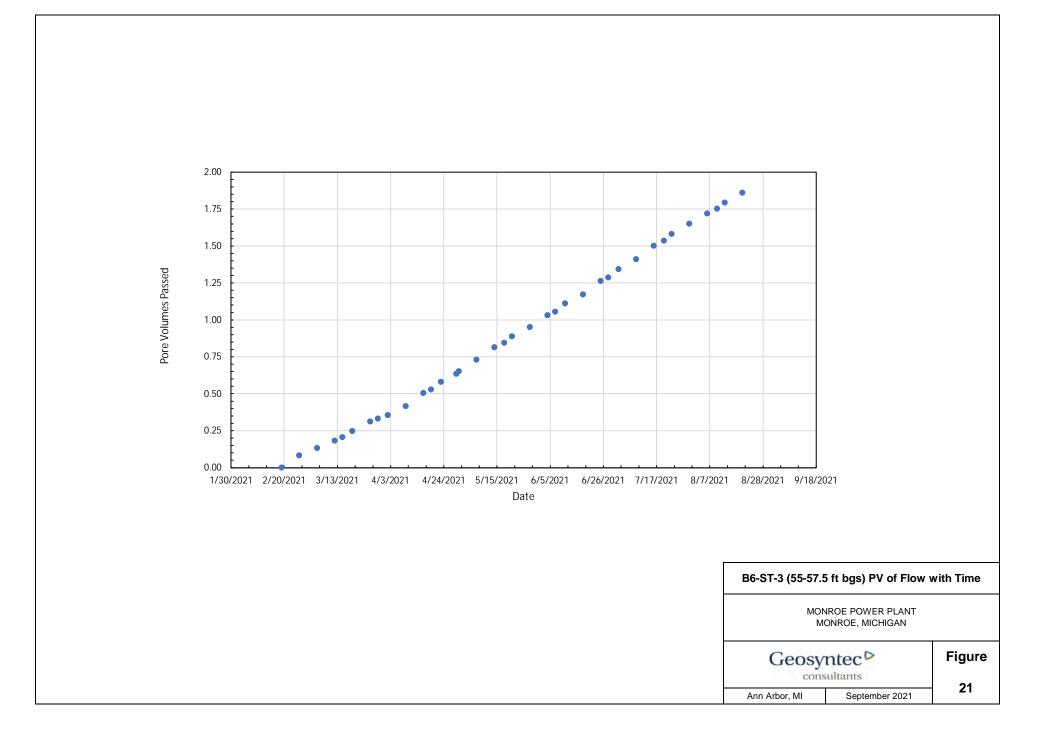


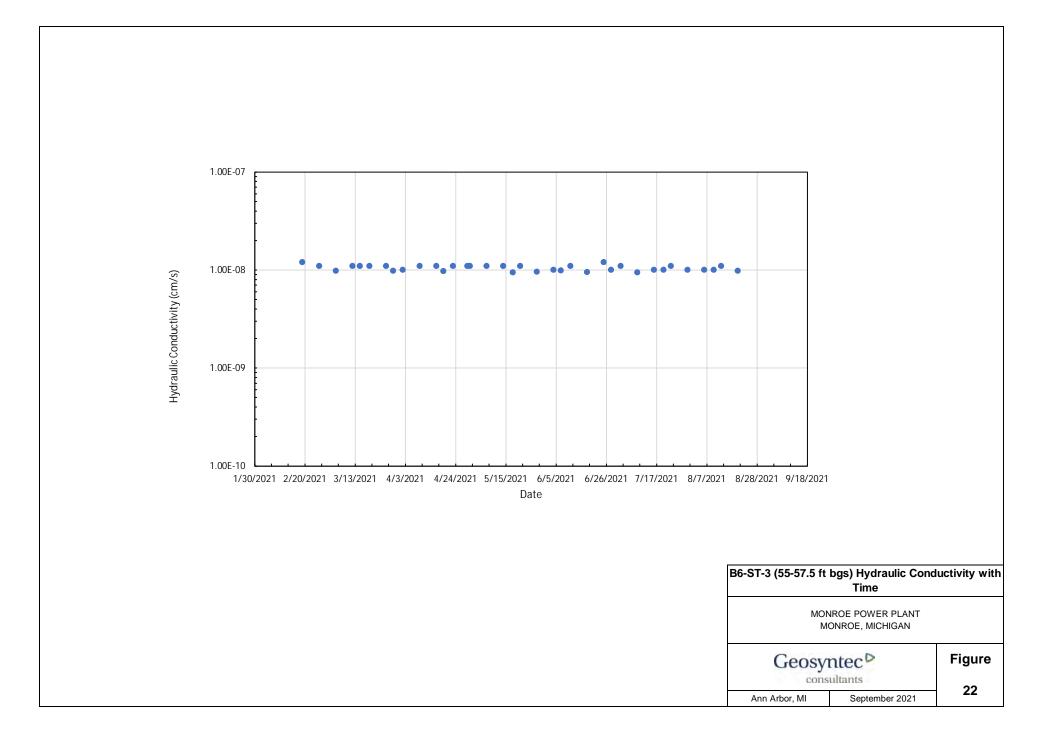


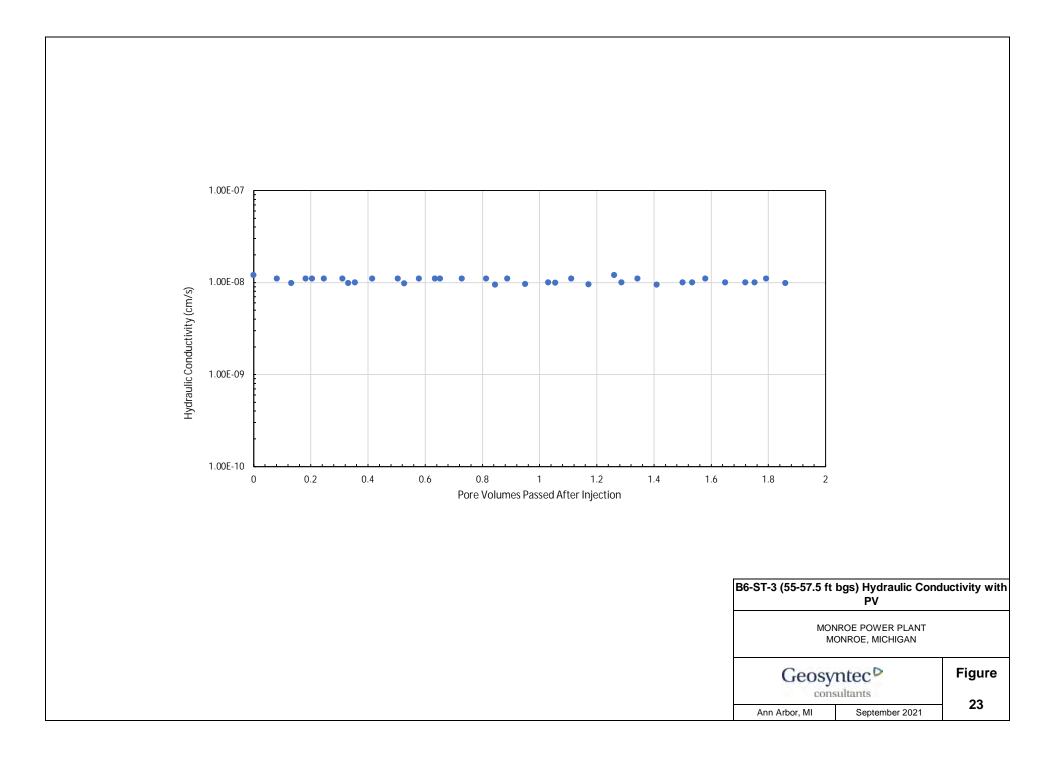


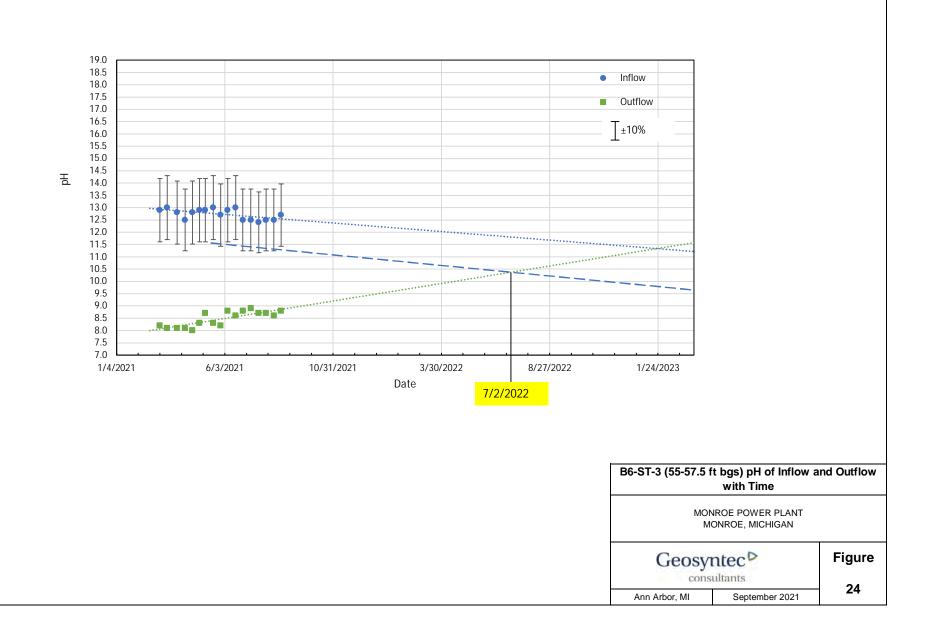


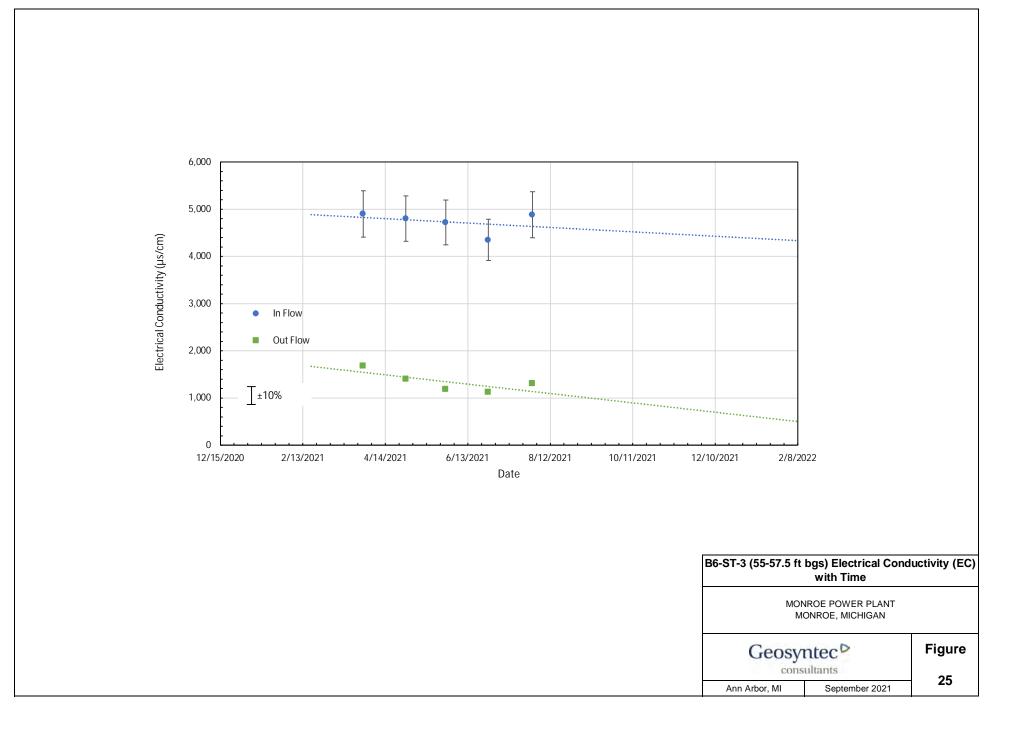


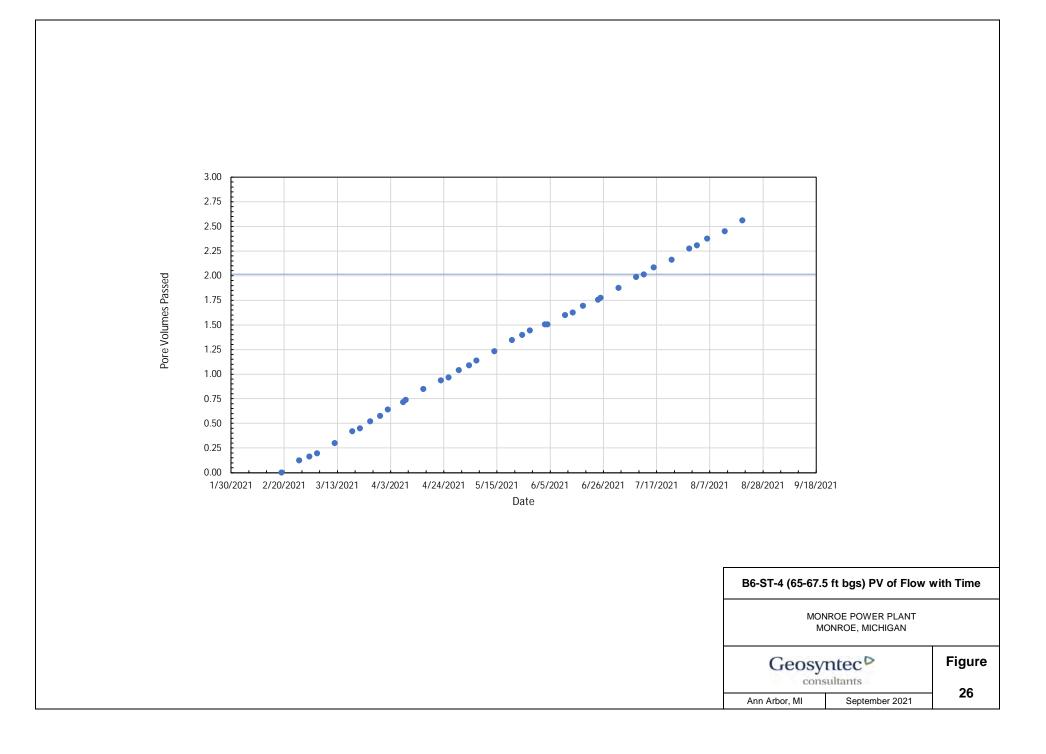


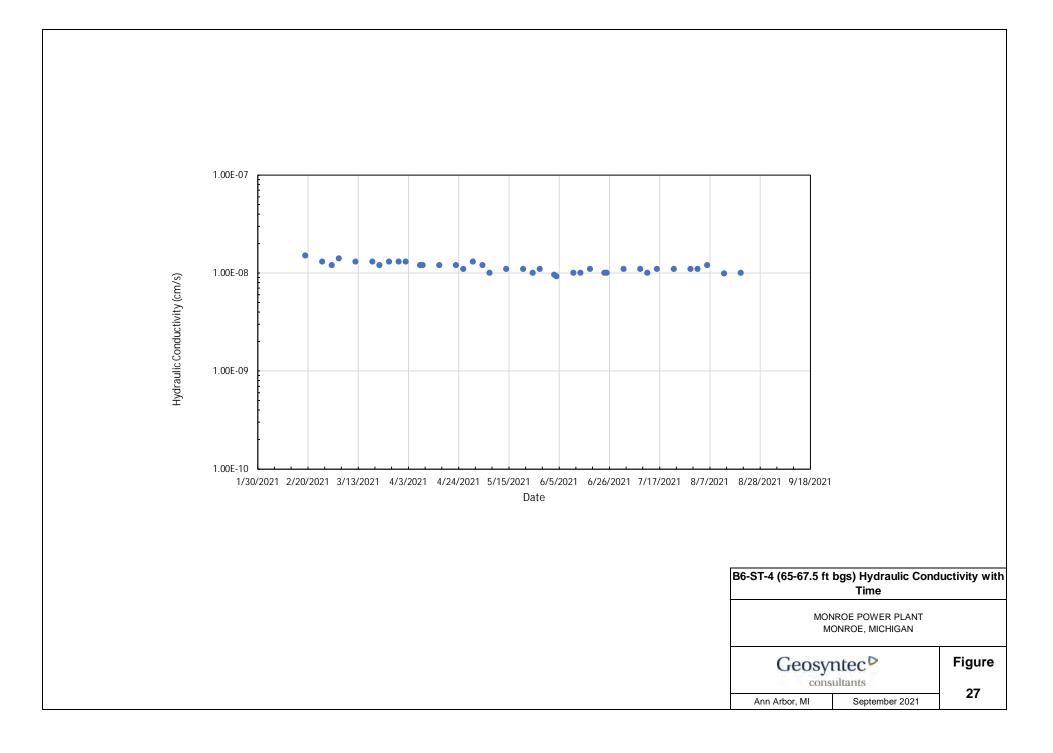


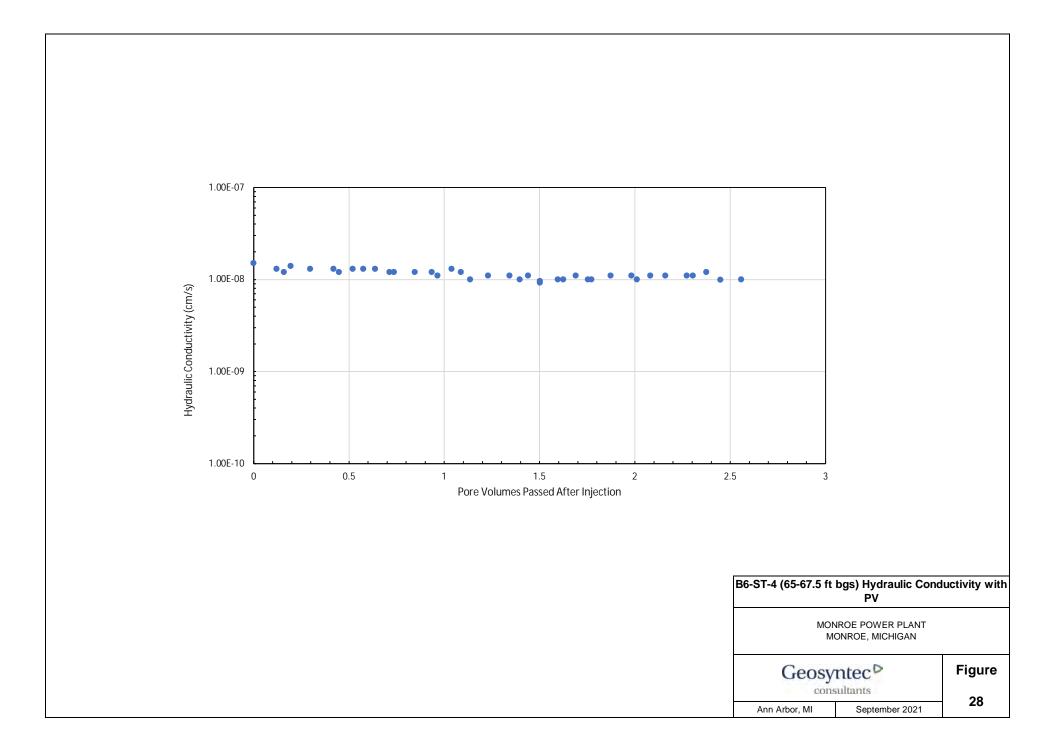


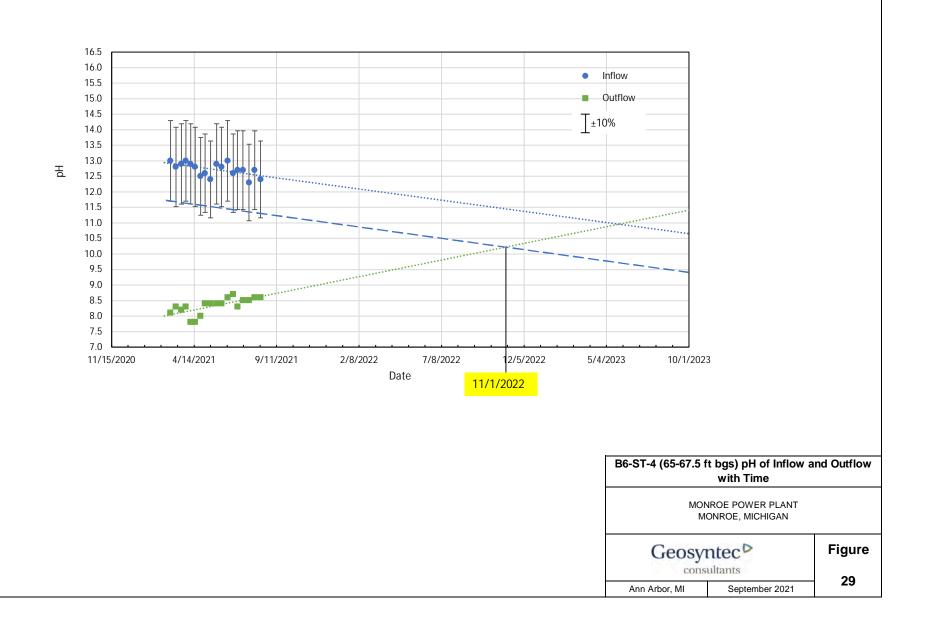


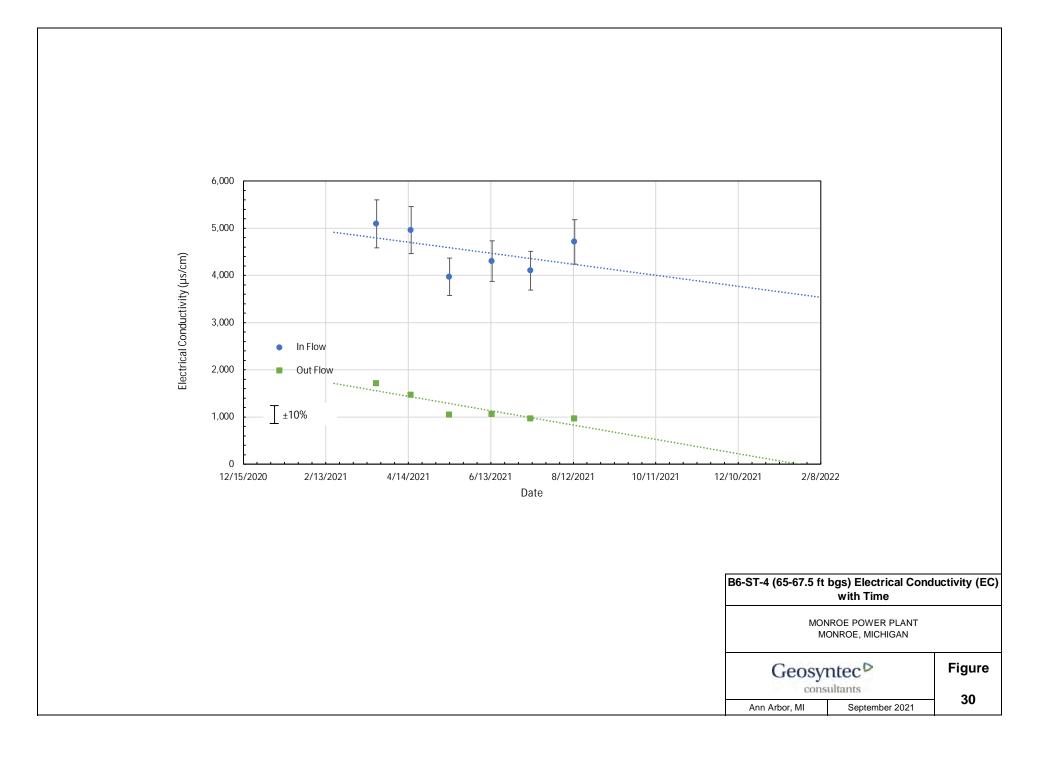


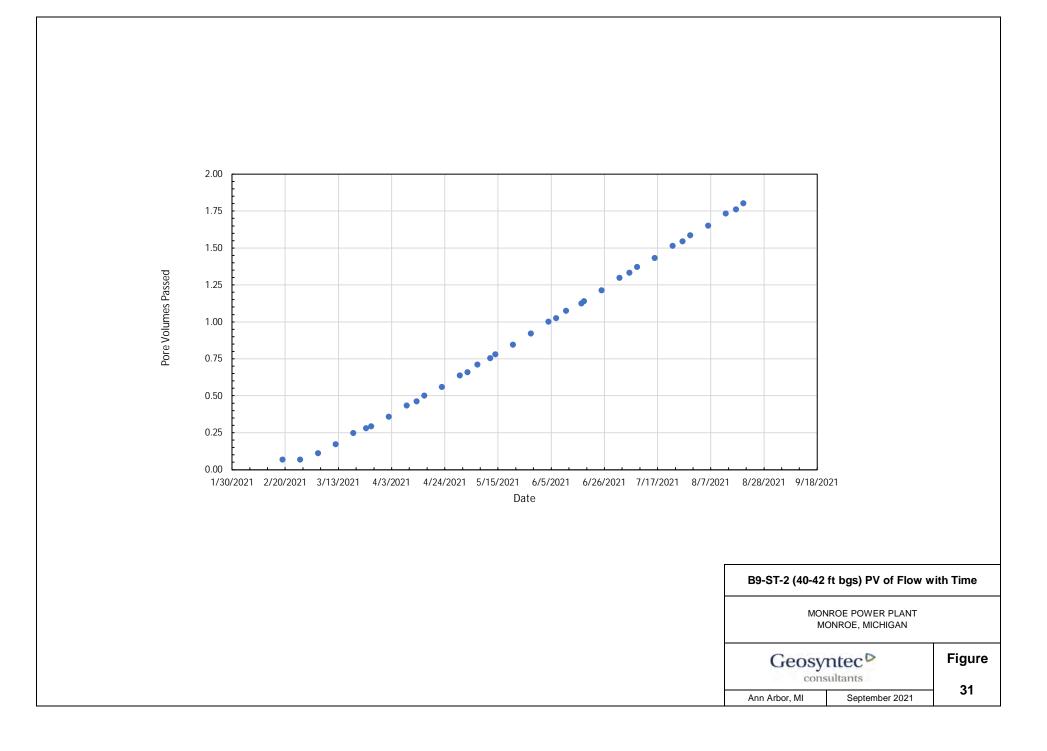


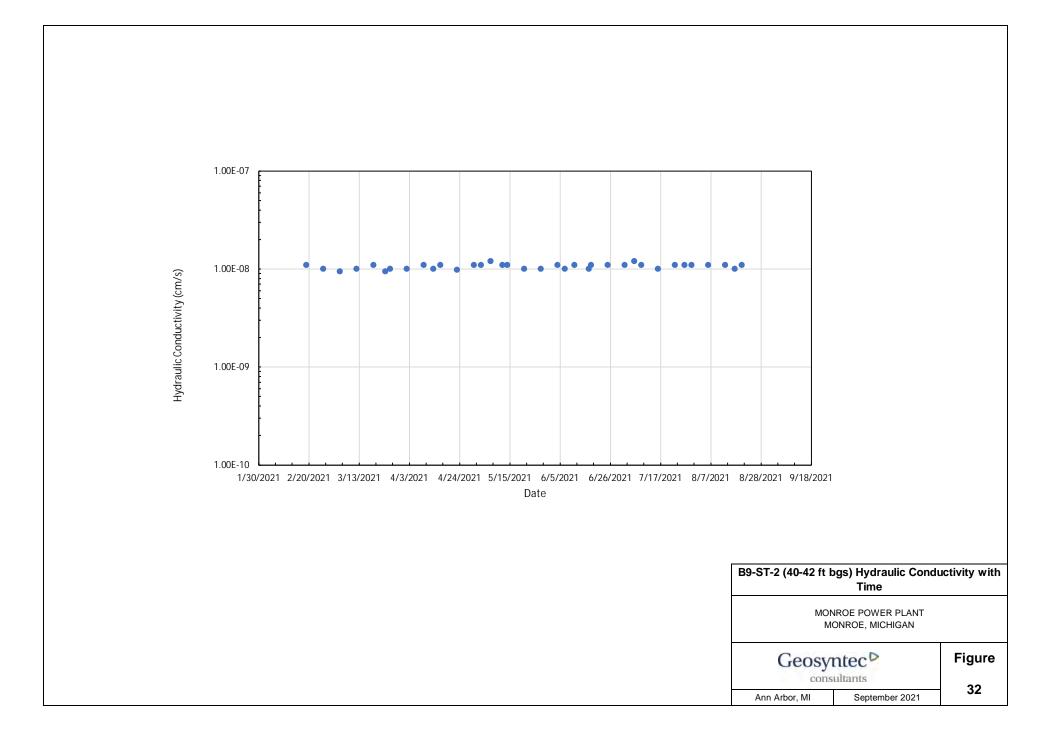


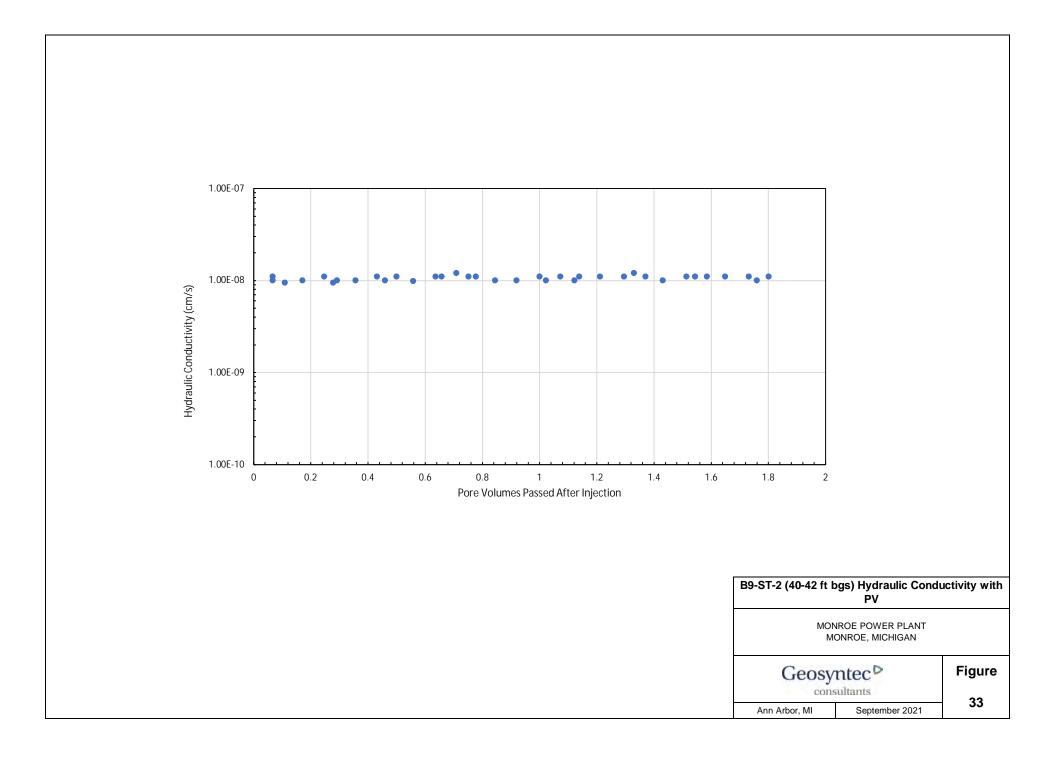


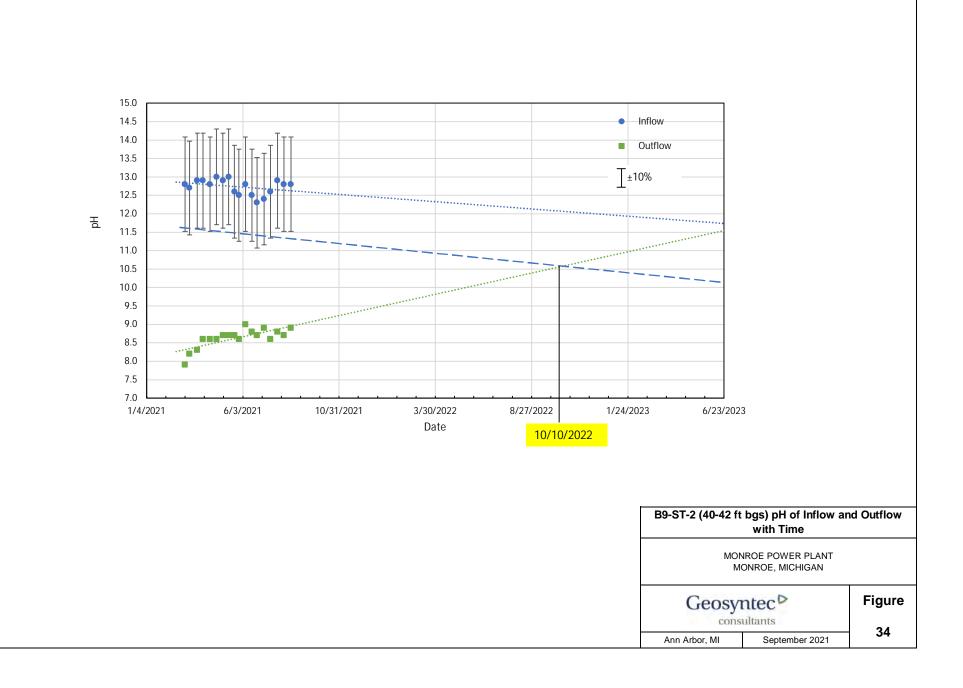


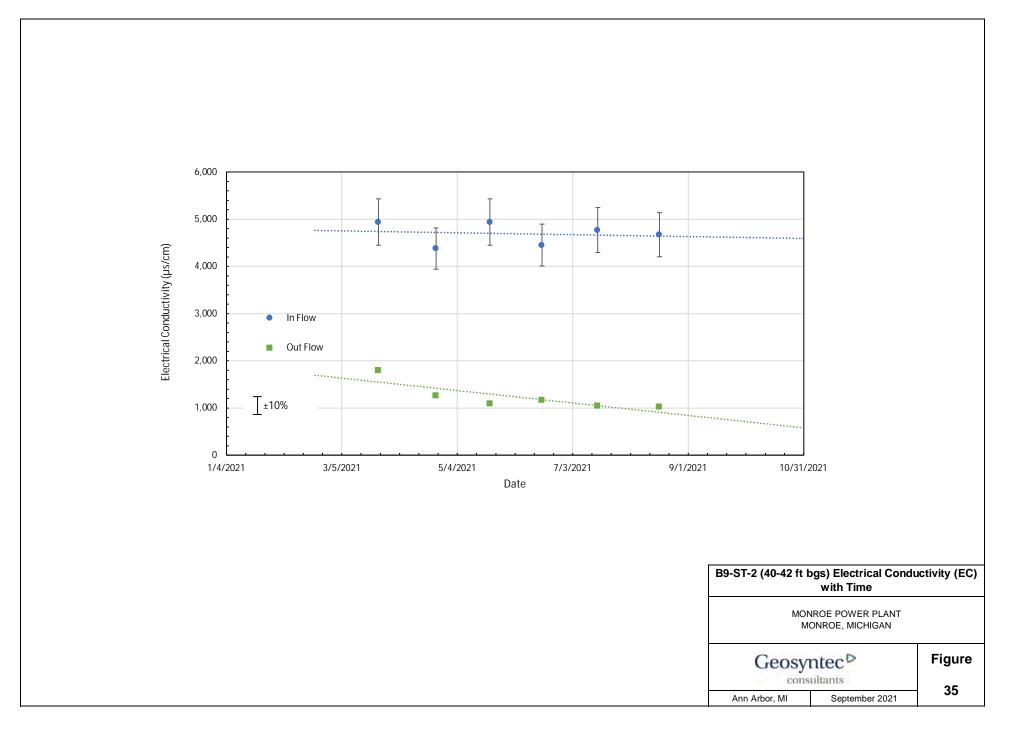


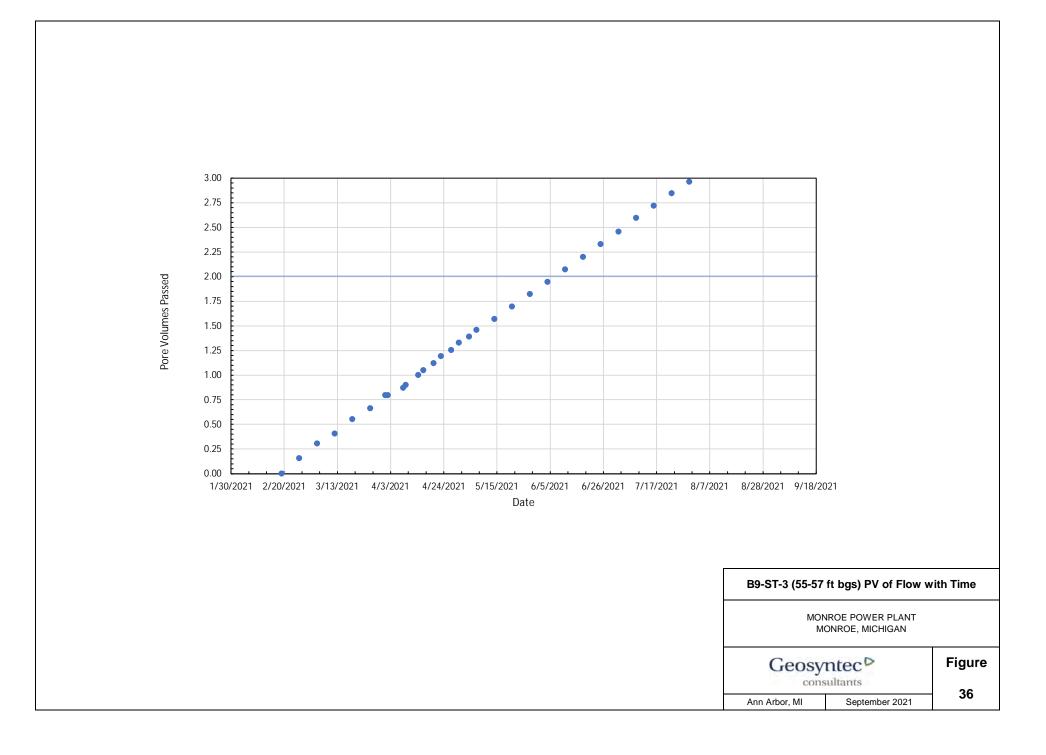


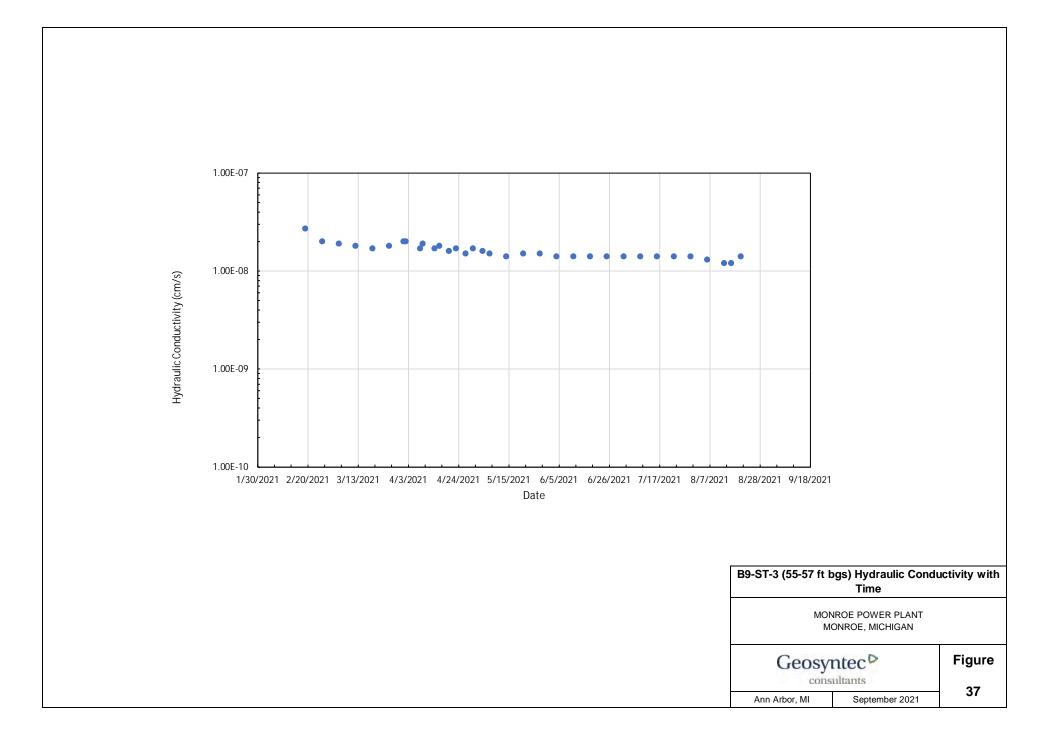


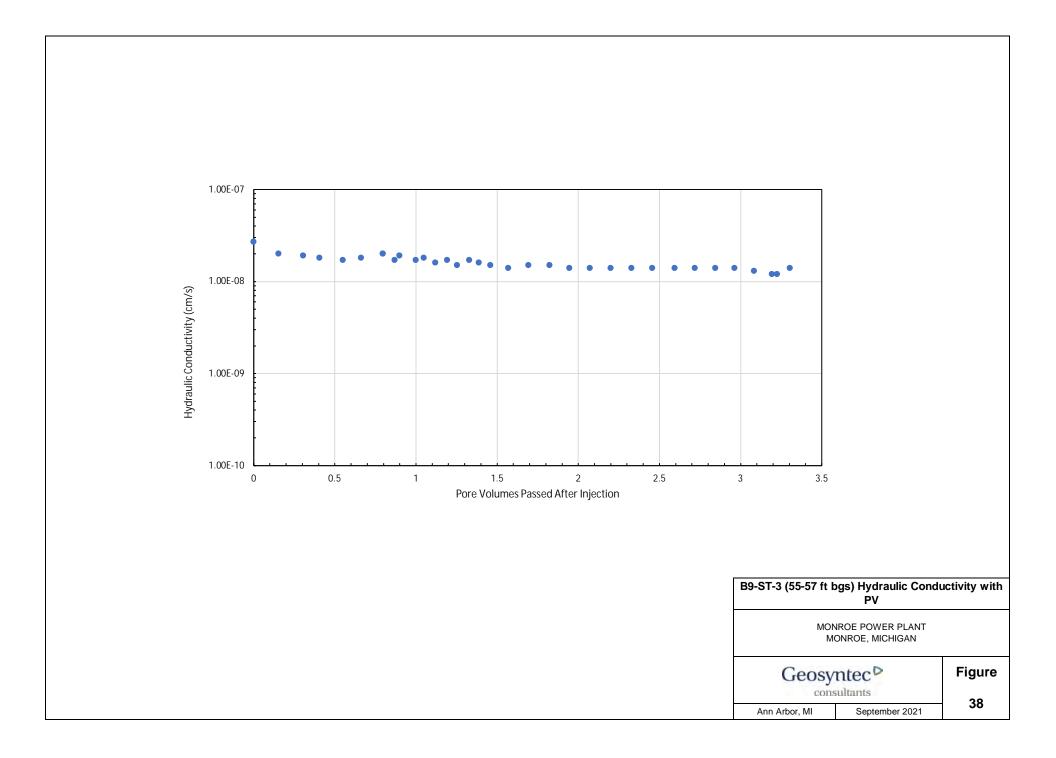


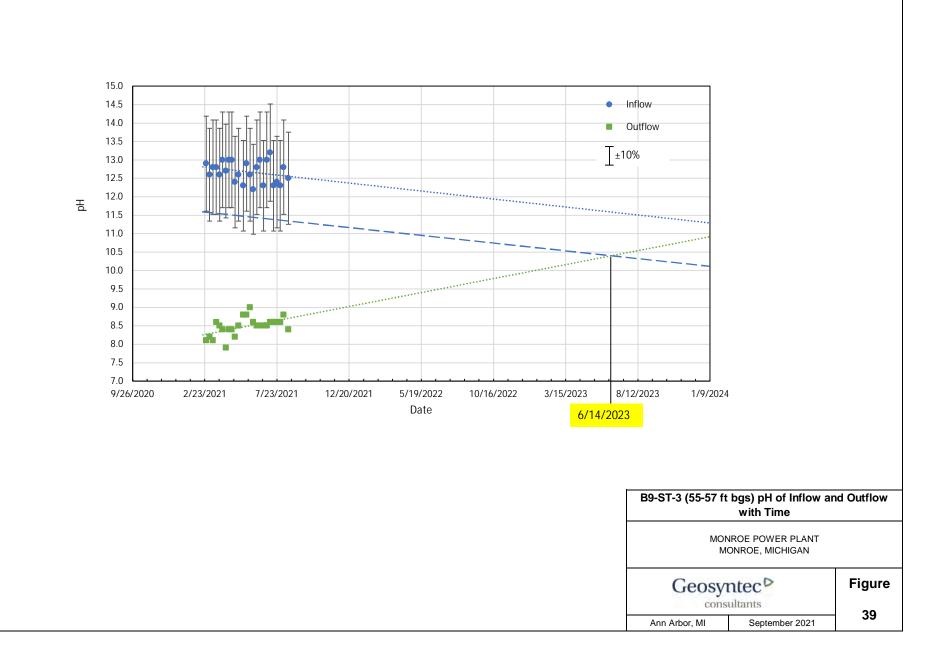


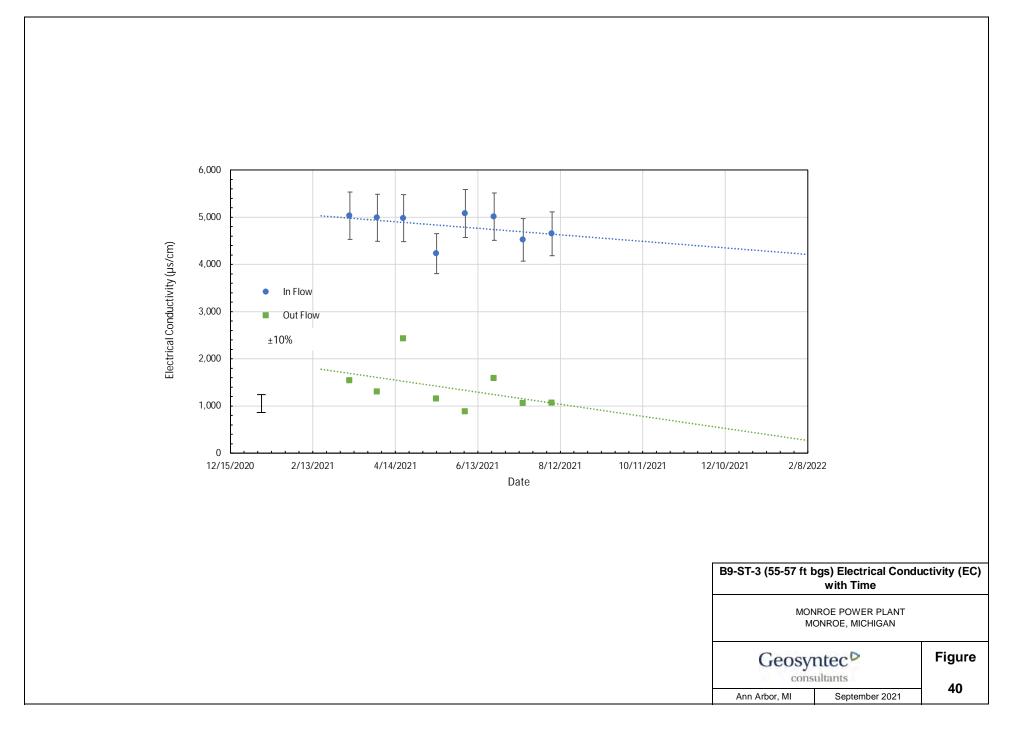












APPENDIX A



Invoice Number	Invoice Date	Account Number	Page
7-212-97245	Dec 15, 2020		2 of 6

USD

\$1,740.41

FedEx Express Shipment Summary By Reference

FedEx Express Shipments (Original)

		Rated		Special		
		Weight	Transportation	Handling	Ret Chg/Tax	
Reference	Shipments	lbs	Charges	Charges	Credits/Other Discounts	Total Charges
NO REFERENCE INFORMATION	9	682.0	3,979.46	302.50	-2,626.46	1,655.50
FROM: ALICIA REVEZZO	2	28.0	180.50	23.54	-119.13	84.91
Total FedEx Express	11	710.0	\$4,159.96	\$326.04	-\$2,745.59	\$1,740.41

TOTAL THIS INVOICE

FedEx Express Shipment Detail By Reference (Original)

Ship Date: Dec Payor: Third Pa		Cust. Ref.: NO REFERENCE INFORMATION Ref.#3:	Ref.#2:	
Fuel Surcharge - Distance Based FedEx has audite	FedEx has applied a fuel surcharge of 4 Pricing, Zone 4 ed this shipment for correct packages, v	ted based on a revenue threshold of \$ 1120417.46 1.50% to this shipment. veight, and service. Any changes made are reflected in the invoi sight of 71.0 lbs, 31 in x 21 in x 15 in, using a dimensional factor of		
Automation	SSFO	<u>Sender</u>	<u>Recipient</u>	
Tracking ID	781132675820	Sean Karoly	Nader S. Rad	
Service Type	FedEx Standard Overnight	Geosentec consultants	Excel Geotechnical Testing Inc	
Package Type	Customer Packaging	SUITE 100	953 Forrest Street	
Zone	04	ANN ARBOR MI 48105 US	ROSWELL GA 30075 US	
Packages	1			
Actual Weight	57.0 lbs, 25.9 kgs	Transportation Charge		412.80
Rated Weight	71.0 lbs, 32.2 kgs	Discount		-231.17
Declared Value	USD 1.00	Earned Discount		-41.28
Delivered	Dec 10, 2020 13:04	Fuel Surcharge		7.62
Svc Area	A1	Declared Value Charge		0.00
Signed by	N.RAD	Additional Handling Charge - Weight		24.00
FedEx Use	00000000/1327/_	Peak - AHS Charge		4.90
		Total Charge	USD	\$176.87

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FedEx.

Ship Date: Dec Payor: Third Pa

Automation Tracking ID Service Type Package Type Zone Packages Actual Weight

Rated Weight

Delivered

Svc Area

Signed by

FedEx Use

Ship Date: Dec Payor: Third Pa

Automation Tracking ID Service Type Package Type Zone Packages Actual Weight

Rated Weight

Delivered

Svc Area

Signed by

FedEx Use

Declared Value

Declared Value

	×	Invoice Number	Invoice Date	Account Number	Page
		7-212-97245	Dec 15, 2020		3 of 6
Ship Date: Dec	•	Cust. Ref.: NO REFERENCE IN	FORMATION Ref.	#2 :	
Payor: Third Pa		Ref.#3:			
Fuel Surcharge - Distance Based I FedEx has audite	FedEx has applied a fuel surcharge o Pricing, Zone 4 d this shipment for correct packages,	lated based on a revenue threshold of \$ 11204 f 4.50% to this shipment. weight, and service. Any changes made are veight of 71.0 lbs, 31 in x 21 in x 15 in, using a	reflected in the invoice amoun	t.	
Automation	SSFO	Sender	Reci	pient	
Fracking ID	781132675830	Sean Karoly		er S. Rad	
Service Type	FedEx Standard Overnight	Geosentec consultants	Exce	el Geotechnical Testing Inc	
Package Type	Customer Packaging	SUITE 100		Forrest Street	
Zone	04	ANN ARBOR MI 48105 US		WELL GA 30075 US	
Packages	1				
Actual Weight	60.0 lbs, 27.2 kgs	Transportation Charge			412.80
Rated Weight	71.0 lbs, 32.2 kgs	Discount			-231.17
Declared Value	USD 1.00	Earned Discount			-41.28
Delivered	Dec 10, 2020 13:04	Fuel Surcharge			7.62
Svc Area	A1	Declared Value Charge			0.00
Signed by	N.RAD	Additional Handling Charge - We	vight		24.00
FedEx Use	000000000/1327/_	Peak - AHS Charge	igni		4.90
CULX 03C	000000000000000000000000000000000000000	Total Charge		USD	\$176.87
Ship Date: Dec	00 2020	Cust. Ref.: NO REFERENCE IN	FORMATION Ref.		, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
Payor: Third Pa		Ref.#3:	ronmation nel.	72.	
The Earned Disc	ount for this ship date has been calcul FedEx has applied a fuel surcharge o	lated based on a revenue threshold of \$ 11204	417.46		
		weight, and service. Any changes made are veight of 71.0 lbs, 31 in x 21 in x 15 in, using a		t.	
Automation	SSF0	Sender	Rec	pient	
Fracking ID	781132675841	Sean Karoly		er S. Rad	
Service Type	FedEx Standard Overnight	Geosentec consultants	Exce	el Geotechnical Testing Inc	
Package Type	Customer Packaging	SUITE 100		Forrest Street	
Zone	04	ANN ARBOR MI 48105 US		WELL GA 30075 US	
Packages	1				
Actual Weight	61.0 lbs, 27.7 kgs	Transportation Charge			412.80
Rated Weight	71.0 lbs, 32.2 kgs	Discount			-231.17
Declared Value	USD 1.00	Earned Discount			-41.28
Delivered	Dec 10, 2020 13:04	Fuel Surcharge			7.62
Svc Area	A1	Declared Value Charge			0.00
Signed by	N.RAD	Additional Handling Charge - We	viaht		24.00
Sigileu by	00000000/1227/		igit		24.00

4.90

\$176.87

USD

Ref.#2:

Ship Date: Dec 09, 2020

Payor: Third Party Ref.#3:

The Earned Discount for this ship date has been calculated based on a revenue threshold of \$1120417.46 Fuel Surcharge - FedEx has applied a fuel surcharge of 4.50% to this shipment.

Distance Based Pricing, Zone 4

00000000/1327/_

FedEx has audited this shipment for correct packages, weight, and service. Any changes made are reflected in the invoice amount. We calculated your charges based on a dimensional weight of 71.0 lbs, 31 in x 21 in x 15 in, using a dimensional factor of 139.

Peak - AHS Charge

Total Charge

Automation	SSFO	<u>Sender</u>	<u>Recipient</u>	
Tracking ID	781132675852	Sean Karoly	Nader S. Rad	
Service Type	FedEx Standard Overnight	Geosentec consultants	Excel Geotechnical Testing Inc	
Package Type	Customer Packaging	SUITE 100	953 Forrest Street	
Zone	04	ANN ARBOR MI 48105 US	ROSWELL GA 30075 US	
Packages	1			
Actual Weight	59.0 lbs, 26.8 kgs	Transportation Charge		412.80
Rated Weight	71.0 lbs, 32.2 kgs	Discount		-231.17
Declared Value	USD 1.00	Earned Discount		-41.28
Delivered	Dec 10, 2020 13:04	Fuel Surcharge		7.62
Svc Area	A1	Declared Value Charge		0.00
Signed by	N.RAD	Additional Handling Charge - Weight		24.00
FedEx Use	00000000/1327/_	Peak - AHS Charge		4.90
		Total Charge	USD	\$176.87

Cust. Ref.: NO REFERENCE INFORMATION

FEGEX .

Automation Tracking ID

Service Type

Package Type

Zone

	(B)	Invoice Number	Invoice Date	Account Number	Page
		7-212-97245	Dec 15, 2020		4 of 6
Ship Date: Dec	09, 2020	Cust. Ref.: NO REFERENCE	INFORMATION Re	f.#2:	
Payor: Third Pa	arty	Ref.#3:			
Distance Based FedEx has audit	ed this shipment for correct packages,	'4.50% to this shipment. weight, and service. Any changes made a reight of 78.0 lbs, 42 in x 16 in x 16 in, using		int.	
Automation	SSFO	<u>Sender</u>	Re	<u>cipient</u>	
Fracking ID	781143770416	Sean Koroly	Na	der S. Rad	
Service Type	FedEx Standard Overnight	Geosyntec Consultants	Exc	cel Geotechical Testing Inc.	
Package Type	Customer Packaging	SUITE 100	953	3 Forrest Street	
Zone	04	ANN ARBOR MI 48105 US	RO	SWELL GA 30075 US	
Packages	1				

Ship Date: Dec	09, 2020	Cust. Ref.: NO REFERENCE INFORMATION	Ref.#2:		
		Total Charge		USD	\$192.79
FedEx Use	00000000/1327/_	Peak - AHS Charge			4.90
Signed by	N.RAD	Additional Handling Charge - Weight			24.00
Svc Area	A1	Declared Value Charge			0.00
Delivered	Dec 10, 2020 13:04	Fuel Surcharge			8.30
Declared Value	USD 1.00	Earned Discount			-45.76
Rated Weight	78.0 lbs, 35.4 kgs	Discount			-256.27
Actual Weight	64.0 lbs, 29.0 kgs	Transportation Charge			457.62
Packages	1				

Payor: Third Party

The Earned Discount for this ship date has been calculated based on a revenue threshold of \$ 1120417.46

Fuel Surcharge - FedEx has applied a fuel surcharge of 4.50% to this shipment.

Distance Based Pricing, Zone 4

FedEx has audited this shipment for correct packages, weight, and service. Any changes made are reflected in the invoice amount.

Ref.#3:

Automation	SSFO	Sender	Recipient	
Tracking ID	781143770427	Sean Koroly	Nader S. Rad	
Service Type	FedEx Standard Overnight	Geosyntec Consultants	Excel Geotechical Testing Inc.	
Package Type	Customer Packaging	SUITE 100	953 Forrest Street	
Zone	04	ANN ARBOR MI 48105 US	ROSWELL GA 30075 US	
Packages	1			
Rated Weight	86.0 lbs, 39.0 kgs	Transportation Charge		497.78
Declared Value	USD 1.00	Discount		-278.76
Delivered	Dec 10, 2020 13:04	Earned Discount		-49.78
Svc Area	A1	Fuel Surcharge		8.92
Signed by	N.RAD	Declared Value Charge		0.00
FedEx Use	00000000/1327/_	Additional Handling Charge - Weight		24.00
		Peak - AHS Charge		4.90
		Total Charge	USD	\$207.06
Ship Date: Dec	09, 2020	Cust. Ref.: NO REFERENCE INFORMATION	Ref.#2:	

Ship Date: Dec 09, 2020 Payor: Third Party

The Earned Discount for this ship date has been calculated based on a revenue threshold of \$ 1120417.46 Fuel Surcharge - FedEx has applied a fuel surcharge of 4.50% to this shipment.

Distance Based Pricing, Zone 4

FedEx has audited this shipment for correct packages, weight, and service. Any changes made are reflected in the invoice amount. We calculated your charges based on a dimensional weight of 78.0 lbs, 42 in x 16 in x 16 in, using a dimensional factor of 139.

Ref.#3:

Automation	SSFO	<u>Sender</u>	<u>Recipient</u>	
Tracking ID	781143770438	Sean Koroly	Nader S. Rad	
Service Type	FedEx Standard Overnight	Geosyntec Consultants	Excel Geotechical Testing Inc.	
Package Type	Customer Packaging	SUITE 100	953 Forrest Street	
Zone	04	ANN ARBOR MI 48105 US	ROSWELL GA 30075 US	
Packages	1			
Actual Weight	64.0 lbs, 29.0 kgs	Transportation Charge		457.62
Rated Weight	78.0 lbs, 35.4 kgs	Discount		-256.27
Declared Value	USD 1.00	Earned Discount		-45.76
Delivered	Dec 10, 2020 13:04	Fuel Surcharge		8.30
Svc Area	A1	Declared Value Charge		0.00
Signed by	N.RAD	Additional Handling Charge - Weight		24.00
FedEx Use	00000000/1327/_	Peak - AHS Charge		4.90
		Total Charge	USD	\$192.79

FedEx.

Ship Da Payor:

ear	S. (1)	Invoice Number 🕥 Invoi	ce Date 🔪 🛛 Account Number	Y Page
		7-212-97245 Dec	15, 2020	5 of 6
Ship Date: Dec (Payor: Third Par		Cust. Ref.: NO REFERENCE INFORMA [·] Ref.#3:	TION Ref.#2:	
Fuel Surcharge - Distance Based F FedEx has audited	FedEx has applied a fuel surcharge o Pricing, Zone 4 d this shipment for correct packages,	ated based on a revenue threshold of \$ 1120417.46 f 4.50% to this shipment. weight, and service. Any changes made are reflected i reight of 78.0 lbs, 42 in x 16 in x 16 in, using a dimensiona		
Automation Tracking ID Service Type Package Type Zone	SSFO 781143770449 FedEx Standard Overnight Customer Packaging 04	<u>Sender</u> Sean Koroly Geosyntec Consultants SUITE 100 ANN ARBOR MI 48105 US	<u>Recipient</u> Nader S. Rad Excel Geotechical Testing Inc. 953 Forrest Street ROSWELL GA 30075 US	
Packages Actual Weight Rated Weight Declared Value Delivered Svc Area Signed by	1 50.0 lbs, 22.7 kgs 78.0 lbs, 35.4 kgs USD 1.00 Dec 10, 2020 13:04 A1 N.RAD	Transportation Charge Discount Earned Discount Fuel Surcharge Declared Value Charge		457.62 -256.27 -45.76 7.00 0.00
FedEx Use	00000000/1327/_	Total Charge	USD	\$162.59
Ship Date: Dec (Payor: Third Par		Cust. Ref.: NO REFERENCE INFORMA Ref.#3:	TION Ref.#2:	
The Earned Disco Fuel Surcharge - Distance Based P FedEx has audited	unt for this ship date has been calcu FedEx has applied a fuel surcharge o Pricing, Zone 4 d this shipment for correct packages,	ated based on a revenue threshold of \$ 1120417.46 f 4.50% to this shipment. weight, and service. Any changes made are reflected i reight of 78.0 lbs, 42 in x 16 in x 16 in, using a dimension:		
Automation Tracking ID Service Type Package Type Zone	SSFO 781143770450 FedEx Standard Overnight Customer Packaging 04	Sender Sean Koroly Geosyntec Consultants SUITE 100 ANN ARBOR MI 48105 US	Recipient Nader S. Rad Excel Geotechical Testing Inc. 953 Forrest Street ROSWELL GA 30075 US	
Packages Actual Weight Rated Weight Declared Value Delivered Svc Area Signed by FedEx Use	1 59.0 lbs, 26.8 kgs 78.0 lbs, 35.4 kgs USD 1.00 Dec 10, 2020 13:04 A1 N.RAD 000000000/1327/_	Transportation Charge Discount Earned Discount Fuel Surcharge Declared Value Charge Additional Handling Charge - Weight Peak - AHS Charge		457.62 -256.27 -45.76 8.30 0.00 24.00 4.90
		Total Charge	USD	\$192.79
	NO R	EFERENCE INFORMATION Refer	ence Subtotal USD	\$1,655.50

Date: Dec 10, 2020	Cust. Ref.: FROM: ALICIA REVEZZO	Ref.#2:
: Third Party	Ref.#3:	

The Earned Discount for this ship date has been calculated based on a revenue threshold of \$ 1120417.46 Fuel Surcharge - FedEx has applied a fuel surcharge of 4.50% to this shipment. Distance Based Pricing, Zone 3

CAFE	<u>Sender</u>	<u>Recipient</u>	
102139850093	GAIL GRAHAM	SAMPLES RECEIVING	
FedEx Standard Overnight	GS SHIPPING STORE & MORE, INC	ALS ENVIRONMENTAL	
Customer Packaging	10952 N STRAITS HWY	3352 128TH AVENUE	
03	CHEBOYGAN MI 49721 US	HOLLAND MI 49424 US	
1			
20.0 lbs, 9.1 kgs	Transportation Charge		85.69
Dec 11, 2020 09:46	Discount		-47.99
A4	Earned Discount		-8.57
A.WIERENGA	Fuel Surcharge		2.12
00000000/1305/_	Additional Handling Charge - Package		13.00
	Third Party Billing		1.23
	Peak - AHS Charge		4.90
	Total Charge	USD	\$50.38
	102139850093 FedEx Standard Overnight Customer Packaging 03 1 20.0 lbs, 9.1 kgs Dec 11, 2020 09:46 A4 A.WIERENGA	102139850093GAIL GRAHAMFedEx Standard OvernightGS SHIPPING STORE & MORE, INCCustomer Packaging10952 N STRAITS HWY03CHEBOYGAN MI 49721 US120.0 lbs, 9.1 kgsTransportation ChargeDec 11, 2020 09:46DiscountA4Earned DiscountA.WIERENGAFuel Surcharge00000000/1305/_Additional Handling Charge - PackageThird Party BillingPeak - AHS Charge	102139850093GAIL GRAHAMSAMPLES RECEIVINGFedEx Standard OvernightGS SHIPPING STORE & MORE, INCALS ENVIRONMENTALCustomer Packaging10952 N STRAITS HWY3352 128TH AVENUE03CHEBOYGAN MI 49721 USHOLLAND MI 49424 US120.0 lbs, 9.1 kgsTransportation ChargeDec 11, 2020 09:46DiscountA4Earned DiscountA.WIERENGAFuel Surcharge00000000/1305/_Additional Handling Charge - PackageThird Party BillingPeak - AHS Charge

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EQL	×.	Invoice Number 🔨	Invoice Date	Account Number	Page
		7-212-97245	Dec 15, 2020		6 of 6
Ship Date: Dec	10, 2020	Cust. Ref.: FROM: ALICIA R	EVEZZO Ref	#2:	
Payor: Third Pa	irty	Ref.#3:			
Fuel Surcharge Distance Based We calculated y	- FedEx has applied a fuel surcharge of Pricing, Zone 4	reight of 8.0 lbs, 12 in x 10 in x 9 in, using a			
Automation	CAFE	Sender	Rec	cipient	
Tracking ID	102139850108	GAIL GRAHAM	GEr	SYNTEC CONSULTANTS	
Service Type	FedEx Standard Overnight	GS SHIPPING STORE & MORE	, INC 930	HARVEST DRIVE	
Package Type	Customer Packaging	10952 N STRAITS HWY	BLI	JE BELL PA 19422 US	
Zone	04	CHEBOYGAN MI 49721 US			
Packages	1				
Actual Weight	5.0 lbs, 2.3 kgs	Transportation Charge			94.81
Rated Weight	8.0 lbs, 3.6 kgs	Discount			-53.09
Delivered	Dec 11, 2020 12:24	Earned Discount			-9.48
Svc Area	A2	Fuel Surcharge			1.45
Signed by	see above	Third Party Billing			0.84
FedEx Use	00000000/1327/02	Total Charge		USD	\$34.53
		FROM: ALICIA REVE77	O Reference Subto	tal IISD	\$84 91

FROM: ALICIA REVEZZO Reference SubtotalUSD\$84.91Total FedEx ExpressUSD\$1,740.41

APPENDIX B

ALTERNATE LINER DEMONSTRATION LABORATORY STUDY FOR MONROE ASH BASIN

	1				1				1
				Moisture		Grain Size -			Flex. Wall
				Content	Grain Size -	Hydrometer	Specific	Atterberg	Permeability
		Sample Interval		(ASTM	Sieve (ASTM	(ASTM	Gravity	(ASTM	(ASTM
BORING NO	SAMPLE NO	(ft bgs)	Sample Layer	D2216)	D6913)	D7928)	, (ASTM D854)	D4318)	D5084)
	B-1-1	0-6	Embankment	1					
	B-1-2	6-16		1	1			1	
	B-1-3	16-20		1					
	B-1-ST-1	20-22		1	1			1	1
	B-1-4	22-26		1					
_	B-1-5	26-36		1	1			1	
1	B-1-6	36-40		1					
	B-1-ST-2	40-42		1	1			1	1
	B-1-7	42-46	~43 Native 1	1					
	B-1-8	46-56	~46 Native 2	1	1			1	
	B-1-9	56-60		1					
	B-1-ST-3	60-62	CPT refusal at 60	1	1			1	1
	B-1-10	62-66	~65 Native 3	1					
	B-1-11	66-76		1	1			1	ļ
	B-2-1	0-6		1					
	B-2-2	6-16		1	1			1	
	B-2-3	16-20		1					
	B-2-ST-1	20-22		1	1			1	1
2	B-2-4	22-26		1					
	B-2-5	26-36		1					
	B-2-6	36-46		1	1			1	
	B-2-7	46-56	~50 Native 2	1	1			1	
	B-2-8	56-66	CPT Refusal at 60	1					
	B-2-9	66-76		1	1			1	
	B-3-1	0-10		1	1			1	
	B-3-2	10-16		1	1			1	
	B-3-3	16-26		1	1			1	
3	B-3-4	26-36		1	1			1	
-	B-3-5	36-46		1	1			1	
	B-3-6	46-56	Native 2 at ~48	1	1			1	
	B-3-7	56-66	Native 3 at ~63	1	1			1	
	B-3-8	66-76		1	1			1	
	B-4-1	0-6		1	1			1	
	B-4-2	6-15		1					
	B-4-ST-1	15-17		1	1		1	1	1
4	B-4-3	17-21		1					
	B-4-4	21-26		1	1			1	
	B-4-5	26-30		1					ļ
	B-4-6	30-35		1	1			1	

Note: The initial testing program was provided to EGT on December 16, 2020 and completed on February 10, 2021.



,	Flex. Wall Permeability / COMPATABILITY (ASTM D7100)
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ALTERNATE LINER DEMONSTRATION LABORATORY STUDY FOR MONROE ASH BASIN

				Moisture		Grain Size -			Flex. Wall	Flex. Wall
		Sample Interval		Content (ASTM	Grain Size - Sieve (ASTM	Hydrometer (ASTM	Specific Gravity	Atterberg (ASTM	Permeability (ASTM	Permeability / COMPATABILITY
BORING NO	SAMPLE NO	(ft bgs)	Sample Layer	D2216)	D6913)	D7928)	(ASTM D854)	D4318)	D5084)	(ASTM D7100)
	B-4-7	35-40	eample layer	1			(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,		(
	B-4-ST-2	40-42	40 ft Native 1	1	1		1	1	1	1
	B-4-8	42-46		1						
	B-4-9	46-51		1	1			1		
	B-4-10	51-55	~52 Native 2	1						
4	B-4-ST-3	55-57.5		1	1		1	1	1	
	B-4-11	57.5-63	~62 Native 3	1						
	B-4-12	63-66		1	1			1		
	B-4-13	66-70		1						
	B-4-ST-4	70-72.5		1	1		1	1	1	1
	B-4-14	72.5-76		1						
	B-5-1	0-6		1						
	B-5-2	6-11		1	1			1		
	B-5-3	11-16		1						
	B-5-4	16-21		1	1			1		
	B-5-5	21-26		1						
	B-5-6	26-31		1	1			1		
	B-5-7	31-36		1						
5	B-5-8	36-42		1	1			1		
	B-5-9	42-46	~45 Native 1	1						
	B-5-10	46-51		1	1			1		
	B-5-11	51-56	~50 Native 2	1	1			1		
	B-5-12	56-61		1						
	B-5-13	61-66		1	1			1		
	B-5-14	66-70	CPT Refusal at 68	1						
	B-5-ST-1	73.5-76		1	1		1	1	1	
	B-6-1	0-6		1						
	B-6-2	6-11		1	1			1		
	B-6-3	11-16		1						
	B-6-4	16-21		1	1			1		
	B-6-5	21-25		1						
	B-6-ST-1	25-27		1	1			1	1	1
	B-6-6	27-31		1						
6	B-6-7	31-36		1	1			1		
	B-6-8	36-40		1						
	B-6-ST-2	40-42.5		1	1		1	1	1	
	B-6-9	42.5-45	45 Native 1	1						
	B-6-10	45-50		1	1			1		
	B-6-11	50-55	~49 Native 2	1						
	B-6-ST-3	55-57.5		1	1			1	1	1
	B-6-12	57.5-60		1						



ALTERNATE LINER DEMONSTRATION LABORATORY STUDY FOR MONROE ASH BASIN

				Moisture Content	Grain Size -	Grain Size - Hydrometer	Specific	Atterberg	Flex. Wall Permeability
		Sample Interval		(ASTM	Sieve (ASTM	(ASTM	Gravity	(ASTM	(ASTM
BORING NO	SAMPLE NO	(ft bgs)	Sample Layer	D2216)	D6913)	D7928)	(ASTM D854)	D4318)	D5084)
	B-6-13	60-65	~60 Native 3	1	1	,	,	1	,
c	B-6-ST-4	65-67.5		1	1			1	1
6	B-6-14	67.5-70		1					
	B-6-15	70-76		1	1			1	
	B-7-1	0-6		1	1			1	
	B-7-2	6-11		1					
	B-7-3	11-16		1	1			1	
	B-7-4	16-21		1					
	B-7-5	21-26		1	1			1	
	B-7-6	26-31	Native 1 at 30 ft	1					
	B-7-7	31-36		1	1			1	
7	B-7-8	36-41		1					
,	B-7-9	41-46		1	1			1	
	B-7-10	46-51	Native 2 at 49 ft	1					
	B-7-11	51-56		1					
	B-7-12	56-61		1	1			1	
	B-7-13	61-65	CPT Refusal at 60 ft	1					
	B-7-ST-1	65-67.5		1	1			1	1
	B-7-14	67.5-71		1					
	B-7-15	71-76		1	1			1	
	B-8-1	0-6		1					
	B-8-2	6-11		1	1			1	
	B-8-3	11-16		1					
	B-8-4	16-21		1	1			1	
	B-8-5	21-26		1					
	B-8-6	26-31		1	1			1	
	B-8-7	31-36	Native 1 at 35	1					
8	B-8-8	36-41		1	1			1	
	B-8-9	41-46		1	1			4	
	B-8-10	46-51	Native 2 at 50	1	1			1	
	B-8-11	51-56	Native 2 at 50	1	1			1	
	B-8-12 B-8-13	56-61 61-66	Native 3 at 59	1	1			1	
	B-8-13 B-8-14	66-71		1	1			1	
	B-8-14 B-8-15	71-76		1	L 1			T	+
	B-9-1	0-6		1					
	B-9-1 B-9-2	6-11		1					-
	B-9-2 B-9-3	11-16		1					
9	B-9-3 B-9-4	16-21		1	1			1	
	B-9-4 B-9-5	21-25		1	<u>+</u>			±	
	B-9-ST-1	25-27		1	1			1	1



Flex. Wall
Permeability /
COMPATABILITY
(ASTM D7100)
1
1
1

BORING NO	SAMPLE NO	Sample Interval (ft bgs)	Sample Layer	Moisture Content (ASTM D2216)	Grain Size - Sieve (ASTM D6913)	Grain Size - Hydrometer (ASTM D7928)	Specific Gravity (ASTM D854)	Atterberg (ASTM D4318)	Flex. Wall Permeability (ASTM D5084)	Flex. Wall Permeability / COMPATABILITY (ASTM D7100)
	B-9-6	27-30		1						
	B-9-7	30-36		1						
	B-9-8	36-40		1	1			1		
	B-9-ST-2	40-42	41 Native 1	1	1		1	1	1	1
	B-9-9	42-46		1						
9	B-9-10	46-50		1	1			1		
	B-9-11	50-55	~52 Native 2	1						
	B-9-ST-3	55-57		1	1		1	1	1	1
	B-9-12	57-60	CPT refusal at 59	1						
	B-9-13	60-65	59 Native 3	1						
	B-9-ST-4	65-67		1	1			1	1	

