MONITORING WELL INSTALLATION REPORT COAL COMBUSTION RESIDUALS (CCR) RULE

INACTIVE BOTTOM ASH BASIN DTE Monroe Plant Monroe, Michigan

Prepared for:

DTE Energy One Energy Plaza Detroit, MI 48226

April 2019

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Appendix A Monitoring Well Construction Log

1.0 INTRODUCTION

At the request of DTE Electric Company (DTE), AECOM Technical Services, Inc. (AECOM) has prepared this Well Installation Report to document the installation of monitoring wells at the DTE Energy Monroe Power Plant located in Monroe, Michigan (**Figure 1**). The field activities were conducted in the vicinity of the inactive Bottom Ash Basin in order to establish a groundwater monitoring system as required by the United States Environmental Protection Agency (USEPA) Final Rule 40 Code of Federal Regulations (CFR), Part 257 (Rule), Section 257.91 Sub-Part (a). The Rule was established to regulate the disposal of Coal Combustion Residuals (CCR) produced by electric generating facilities (USEPA, 2015).

1.1 Site Location

The DTE Monroe Plant (Monroe Plant) is located in Monroe County Michigan approximately 2 miles east of the city of Monroe. The Monroe Plant was built in the early 1970s and occupies a parcel of land approximately 440 acres in size. The plant buildings, coal pile, and appurtenances associated with power generation reside on the northern (approximately 274 acres) portion of the 440-acre land parcel. The southern portion of the land parcel consists of the inactive Bottom Ash Basin area plus the Process Pond area which, together cover approximately 166 acres.

The Monroe Plant is bounded to the east by the shoreline of Lake Erie; to the west by neighboring industrial facilities and the plant discharge canal; to the south by undeveloped land; and to the north by mixed residential/commercial properties as well as Plum Creek, as shown on **Figure 1**. Topography at the Bottom Ash Basin area is relatively flat with elevations ranging from 580 down to 572 feet mean sea level (msl), which is close to the mean elevation of Lake Erie.

1.2 Description of the CCR Unit

The Inactive Bottom Ash Basin is located to the south of the main Monroe Plant area and encompasses an area approximately 105 acres in size (**Figure 1**). The Inactive CCR Impoundment area was constructed in the late 1960s by building a perimeter dike to surround a low area of the adjacent Lake Erie; the area south of the plant was removed from the Waters of the United States by an Act of Congress prior to plant construction. CCR materials have been placed and allowed to drain into the pond from the north end of the pond; these materials currently form a delta that extends about 1/3 of the way into the pond. For purposes of the CCR groundwater study, the Inactive Bottom Ash Basin is considered a single CCR unit.

2.0 HYDROGEOLOGY

The following section presents information regarding the site-specific geologic and hydrogeologic conditions based on the findings from field investigation activities.

2.1 Geologic Setting

The Monroe Plant site is located on the eastern side of the Michigan Basin, which is a regional geologic structure in which the bedrock layers have warped downward towards a low spot in west-central Michigan. Accordingly, bedrock layers in the site vicinity are inclined (dip) at a very shallow angle to the west. The bedrock underlying the site is comprised of late Silurian age sedimentary rocks (predominantly dolomites and shales) from the Bass Island Group. The uppermost bedrock in the area tends to be highly weathered and is comprised of a tan, argillaceous dolomite with interbedded dark gray, firm to soft shales. The Bass Island Group is underlain by the middle to late Silurian age Salina Group, which is also comprised of alternating dolomite and shale units as well as anhydrite beds.

The bedrock in the site vicinity is overlain by approximately 40 to 50 feet of unconsolidated deposits of glacial origin. The deposits are comprised of two distinct units: a hard glacial till immediately overlying bedrock and lacustrine (lake bed or lake shore) deposits which overlay the till unit. Various thicknesses of surficial fill materials are present across the entire Monroe Plant and ash basin areas.

2.2 Local Hydrogeology

A series of cross-sections was prepared by NTH Consultants, LTD as part of a sitewide study completed in 2014. The locations of these sections are illustrated on **Figure 2**. These sections illustrate the sequence of geologic materials present under the Plant, Bottom Ash Basin, and Process Pond areas based on an assemblage of available boring logs. The lowermost unit identified in these areas is the glacial till. The till is comprised of overconsolidated (highly compacted) gray silty to sandy clay with some cobbles and boulders, and ranges from approximately 20 to 50 feet in thickness (**Figures 2a and 2b**). The overlying lacustrine deposits are composed of 10 to 30 feet of fine-grained sand and silt with some soft clay except where there is a thin, discontinuous coarse sand unit at the base of the lacustrine sequence (**Figure 2b**).

Under parts of the Plant, the Inactive Bottom Ash Basin, and Process Pond areas, this sand unit ranges in thickness from 5 to 20 feet and yields groundwater. The sand unit thins progressively to the west, having a thickness of approximately 12 feet on the east side of the discharge canal and thinning to less than a few feet within 150 feet to the west of the discharge canal. Further to the west the sand unit is not evident in soil borings for monitoring wells drilled in 2016 around the Fly Ash Basin. This is consistent with the expectation that lake-deposited materials will decrease in thickness with distance away from Lake Erie. Accordingly, it appears that this sand unit is a localized lakeshore beach deposit formed by westward aggradation with rising lake level and subsequently blanketed by finer lacustrine deposits. Groundwater in the sand unit is under semi-confined conditions with groundwater elevations ranging between approximately 572.6 and 575.6 feet above mean sea level (msl).

Lithologic information for each Inactive Bottom Ash Basin monitoring well is provided on the monitoring well construction logs included in **Appendix A**. Geologic Cross-sections are presented in **Figures 2a and 2b.**

2.2.1 Uppermost Aquifer System

The following section presents the expectations under the CCR Rule for identifying the uppermost aquifer subject to groundwater monitoring and describes the lithologic unit identified as the uppermost aquifer in the vicinity of the combined footprint of the Inactive Bottom Ash Basin at the Monroe Plant.

As described in the CCR Rule:

"The owner or operator of a CCR unit must install a groundwater monitoring system that consists of a sufficient number of wells, installed at appropriate locations and depths, to yield groundwater samples from the uppermost aquifer…"

Applicable definitions from the CCR rule (40 CFR 257.93) regarding the definition of an aquifer and the uppermost aquifer include the following:

"Aquifer means a geologic formation, group of formations, or portion of a formation capable of yielding usable quantities of groundwater to wells or springs."

 "Uppermost aquifer means the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers that are hydraulically interconnected with this aquifer within the facility's property boundary. Upper limit is measured at a point nearest to the natural ground surface to which the aquifer rises during the wet season."

Based on the hydrogeologic investigation findings, the uppermost aquifer zone occurs in the lower portion of a sequence of lacustrine deposits that is dominated by silty materials near the ground surface or under fill materials, which transitions at depth to a fine-grained sand. The shallow water-bearing zone is semiconfined by the overlying silts, with water levels generally higher than the top of the lacustrine unit. This water-bearing zone overlies a thick, hard glacial till. The glacial till unit acts as an aquitard between the unconsolidated deposits and the deeper, underlying bedrock.

2.2.2 Groundwater Flow and Hydraulic Conductivity

Water level data collected during the baseline groundwater monitoring program were used to construct potentiometric surface maps for the shallow groundwater zone. The data suggest that the direction of groundwater flow within the upper water-bearing zone is generally to the south-southwest towards Lake Erie, with an average gradient along the flow direction of approximately 0.00044 foot/foot (roughly 0.45 foot per 1000 feet). These values are within the expected range for the type of aquifer and the hydraulic setting. Potentiometric surface maps from the March 2018 and September 2018 sampling events are included in **Figures 4a and 4b**. As noted above, the aquifer unit thins to the west and the north such that there is no aquifer under areas north of the Inactive Bottom Ash Basin. Consequently, there is no representative upgradient or background monitoring position available for the unit. This directly affects the approach to the evaluation of compliance for the monitoring system as noted in the Statistical Methods Certification for this unit.

Hydraulic Conductivity

Aquifer testing (via drawdown and recovery tests using a submersible pump) was completed at monitoring wells MW-1S, MW-3S, MW-7S, and MW-8S. Testing data were evaluated on a well-by-well basis to assist in selecting the appropriate solution via the AqtesolvTM software platform. Some key assumptions included the following: confined or leaky confined, presence of wellbore storage, and whether individual wells were considered fully or partially penetrating. The test pumping rates were low enough that the potential boundary conditions represented by the physical aquifer limits (to the north and west) were not expected to be detected in the drawdown or recovery data.

The shallow water-bearing zone wells yield groundwater at a relatively high rate. Where the zone has a component of gravel in the fine sand, the wells (MW-1S and MW-7S) produced significantly more water than monitoring wells screened in fine sand with silt (wells MW-3S and MW-8S). Calculated hydraulic conductivity values for the uppermost aquifer are summarized below:

cm2/sec – centimeters squared per second cm/sec – centimeters per second m/day – meters per day ft/day – feet per day

Horizontal Time of Travel

The horizontal time of travel for the Inactive Bottom Ash Basin area was calculated using Darcy Flux calculations and the following input values:

- · Hydraulic Gradient (foot/foot) based on average of dry and wet season potentiometric contours
- · Hydraulic Conductivity (feet/day) based on a median value estimated for the shallow aquifer system
- · Effective Porosity (unit less) based on published values for silty sands

Assuming an effective porosity of 30 percent for silty sand with some gravel, a gradient value of 0.00044 foot/foot with a median conductivity value of 119 feet/day, the horizontal time of travel is estimated to be 0.174 feet/day (or 260 feet/year).

3.0 GROUNDWATER MONITORING SYSTEM INSTALLATION

The CCR groundwater monitoring system well network was installed in two phases. The first phase of activities, conducted between September 19 and October 4, 2016, included the installation of seven (7) shallow and four (4) exploratory, deep (bedrock) monitoring wells in the vicinity of the inactive Bottom Ash Basin. Groundwater monitoring was performed over an 8-month period to evaluate the hydrogeology and groundwater chemistry in the vicinity of the inactive Bottom Ash Basin. Findings were used to select the location of seven (7) additional monitoring wells to establish the CCR groundwater monitoring system well network. The additional monitoring wells were installed between September 20 and September 26, 2017.

3.1 Borehole Advancement and Well Installation

Each monitoring well was installed by a State of Michigan licensed well driller as directly observed by an AECOM Geologist. Borings were advanced using a rotosonic drill rig and soil cores were collected in continuous sections for examination and lithologic description by the on-site geologist to the terminating depth of each borehole. Photographs of each soil core were collected. In total, 14 boreholes were advanced into the upper water-bearing zone in unconsolidated materials. Upon reaching the target depth, a monitoring well was installed in each borehole. Four (4) separate boreholes were advanced into a water-bearing zone of the bedrock that underlies the unconsolidated materials, but these wells are not included in the monitoring system because there is a strong upward hydraulic gradient between the bedrock and shallow groundwater systems that prevents downward migration of contaminants.

3.2 Well Construction

Each monitoring well was constructed using 2-inch inside diameter polyvinyl chloride (PVC) casing with a 10-foot section of 0.010-inch slotted PVC screen. The annular space (between the borehole wall and well screen/casing) was backfilled with a clean silica sand pack extending at least 2 feet above the top of the screen. A minimum 2-foot thick bentonite seal was placed on top of the sand pack and each seal was allowed to hydrate for at least 1 hour per manufacturer's specifications. After hydrating the seal, the remaining annular space was filled with a cement/bentonite grout emplaced via tremie method to within approximately 12 inches of the ground surface.

3.3 Well Development

Each monitoring well was developed no sooner than 24-hours after grout emplacement to enhance hydraulic connection between the well and the aquifer and to remove potable water introduced to the subsurface during drilling activities. A submersible pump was used to remove at least five (5) well volumes or until the water was visibly clear of sediments, turbidity was less than 10 nephalometric

turbidity units (NTUs), and water quality measurements [temperature, pH, conductivity, and oxidationreduction potential (ORP)] were stable over at least three (3) well volumes.

3.4 Well Survey

Each monitoring well was surveyed for horizontal location (North American Datum of 1983 or NAD 83) and elevation data(North American Vertical Datum of 1988 or NAVD 88). by a surveyor licensed in the State of Michigan. Top-of-casing and ground surface elevations were recorded to the nearest 0.01 foot.

4.0 CCR GROUNDWATER MONITORING SYSTEM DESCRIPTION

Based on site-specific hydrogeologic information and groundwater flow, 12 shallow monitoring wells were selected as the groundwater monitoring system for the inactive Bottom Ash Basin. The number, spacing, and depth of monitoring wells was based on a thorough characterization of the hydrogeologic factors included in § 257.91 (b)(1)&(2). As noted in Section 3.1 above, each well was installed into the uppermost water-bearing zone underlying the site. The zone is comprised primarily of sand with varying amounts of silt present between approximately 25 to 35 feet below ground surface (bgs) on site. Each well is equipped with a dedicated bladder pump system and tubing installed for sampling purposes.

Monitoring well locations are shown on **Figure 3**. **Table 1** contains information regarding well locations and construction details. Well lithologic and construction logs are included as **Attachment A**.

5.0 CCR GROUNDWATER MONITORING SYSTEM CERTIFICATION

AECOM ("Consultant") has been retained by DTE Energy to provide certification of the groundwater monitoring system as required under 40 CFR § 257.91(f) of the HAZARDOUS AND SOLID WASTE MANAGEMENT SYSTEM; DISPOSAL OF COAL COMBUSTION RESIDUALS FROM ELECTRIC UTILITIES; FINAL RULE, 80 Fed. Reg. 21302 (Apr. 17, 2015) ("CCR Rule") for the inactive CCR unit identified by DTE Energy at their Monroe Plant located in Monroe, Michigan.

Requirements

Pursuant to 40 CFR § 257.90(b)(1), by April 17, 2019, the owner or operator of an inactive CCR unit must install a groundwater monitoring system that meets the requirements of 40 CFR § 257.91. The groundwater monitoring system must meet the CCR Rule's performance standard, which requires the system to consist of a sufficient number of wells, installed at appropriate locations and depths, to yield groundwater samples from the uppermost aquifer that accurately represent the quality of:

- (1) background groundwater that has not been affected by leakage from a CCR unit; and
- (2) groundwater passing the waste boundary of the CCR unit and monitoring all potential contaminant pathways.

The CCR unit identified at the site is the Inactive Bottom Ash Basin. The CCR Rule groundwater monitoring system requirement is addressed by a single system consisting of 12 monitoring wells. Information regarding the groundwater monitoring system design and construction has been provided to the qualified professional engineer as required by 40 CFR § 257.91(e)(1) and is included in the facility operating record per 40 CFR § 257.91(e)(1).

Limitations

The signature of Consultant's authorized representative on this document represents that to the best of Consultant's knowledge, information, and belief in the exercise of its professional judgment, it is Consultant's professional opinion that the aforementioned information is accurate as of the date of such signature. Any opinion or decisions by Consultant are made on the basis of Consultant's experience, qualifications, and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

6.0 **CERTIFICATION**

 $\sqrt{1075522}$, being a Registered Professional Engineer, in accordance \mathbf{I} with the State of Michigan Professional Engineer's Registration program, possessing the technical knowledge and experience to make the specific technical certifications required under 40 Code of Federal Regulations (CFR) Part 257, Subpart D, Standards for the Disposal of Coal Combustion Residuals (CCRs) in Landfills and Surface Impoundments, and being licensed in the state where the CCR unit(s) is located, do hereby certify to the best of my knowledge, information, and belief, that the groundwater monitoring system that is the subject of this certification has been designed and constructed to meet the requirements of 40 CFR § 257.91.

Signature:

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nt fu

 43961

Date:

License #:

License Renewal Date:

 $10/31/20$

DTE Monroe Plant

TABLE

TABLE 1 DTE ENERGY MONROE POWER PLANT MONITORING WELL CONSTRUCTION SUMMARY

TOC - Top of Casing ft MSL - feet above Mean Sea Level ft BTOC - feet below top of casing PVC - Polyvinyl Chloride

FIGURES

 $\mathbf{1}$

NORTHWEST SOUTHEAST

 \mathbf{H}^{\prime}

APPENDIX A

Monitoring Well Construction Logs

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Report: DTE_MONROE; File J:\RESOURCE\DISCIPLINES\EW\GINT\PROJECTS\DTE\MONROE_GRANVILLE CLONE.GPJ; 10/27/2016 4:25:06 PM

Log of MW-1D

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-1D

Sheet 3 of 3

Project Location: Monroe, Michigan

Project Number: 60489524

Sheet 1 of 2

Report: DTE_MONROE; File J:\RESOURCE\DISCIPLINES\EW\GINT\PROJECTS\DTE\MONROE_GRANVILLE CLONE.GPJ; 10/27/2016 4:25:11 PM

Project Location: Monroe, Michigan

Project Number: 60489524

Report: DTE_MONROE; File J:\RESOURCE\DISCIPLINES\EW\GINT\PROJECTS\DTE\MONROE_GRANVILLE CLONE.GPJ; 10/27/2016 4:25:12 PM

Log of MW-1S

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-2S

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Report: DTE_MONROE; File J:\RESOURCE\DISCIPLINES\EW\GINT\PROJECTS\DTE\MONROE_GRANVILLE CLONE.GPJ; 10/27/2016 4:25:26 PM

Log of MW-3D

Project Location: Monroe, Michigan

Project Number: 60489524

Report: DTE_MONROE; File J:\RESOURCE\DISCIPLINES\EW\GINT\PROJECTS\DTE\MONROE_GRANVILLE CLONE.GPJ; 10/27/2016 4:25:27 PM

Log of MW-3D

Sheet 3 of 3

Project Location: Monroe, Michigan

Project Number: 60489524

Sheet 1 of 2

Report: DTE_MONROE; File J:\RESOURCE\DISCIPLINES\EW\GINT\PROJECTS\DTE\MONROE_GRANVILLE CLONE.GPJ; 10/27/2016 4:25:31 PM

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-3S

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-4S

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-5S

Project Location: Monroe, Michigan

Project Number: 60489524

Report: DTE_MONROE; File J:\RESOURCE\DISCIPLINES\EW\GINT\PROJECTS\DTE\MONROE_GRANVILLE CLONE.GPJ; 10/27/2016 4:25:44 PM

Log of MW-5S

Sheet 3 of 3

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Report: DTE_MONROE; File J:\RESOURCE\DISCIPLINES\EW\GINT\PROJECTS\DTE\MONROE_GRANVILLE CLONE.GPJ; 10/27/2016 4:25:51 PM

Log of MW-7D

Project Location: Monroe, Michigan

Project Number: 60489524

Report: DTE_MONROE; File J:\RESOURCE\DISCIPLINES\EW\GINT\PROJECTS\DTE\MONROE_GRANVILLE CLONE.GPJ; 10/27/2016 4:25:52 PM

Log of MW-7D

Sheet 3 of 3

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Report: DTE_MONROE; File J:\RESOURCE\DISCIPLINES\EW\GINT\PROJECTS\DTE\MONROE_GRANVILLE CLONE.GPJ; 10/27/2016 4:25:57 PM

Log of MW-7S

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Sheet 3 of 3

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Report: DTE_MONROE; File J:\RESOURCE\DISCIPLINES\EW\GINT\PROJECTS\DTE\MONROE_GRANVILLE CLONE.GPJ; 10/27/2016 4:26:12 PM

Log of MW-8S

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-9

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-9

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-10

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Sheet 2 of 2 **MW-11**

Log of

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-12

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-12

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-13

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-14

Project Location: Monroe, Michigan

Project Number: 60489524

Project Location: Monroe, Michigan

Project Number: 60489524

Log of MW-15

