

Bottom Ash Basin Closure Certification Report

River Rouge Power Plant Bottom Ash Basin Coal Combustion Residual Unit

November 2020, Revised February 2021

Vincent E. Buening, C.P.G. Senior Project Manager

Prepared For:

DTE Electric Company

Prepared By:

TRC 1540 Eisenhower Place Ann Arbor, Michigan 48108

David B. McKenzie, P.E. Senior Project Engineer



TABLE OF CONTENTS

1.0	Intro	oduction	1
	1.1	Closure Overview and Objectives	1
	1.2	Site Overview and Description of CCR Units	
	1.3	Regulatory Background	
2.0	Clos	sure by Removal	4
	2.1	Summary of Closure Approach	4
	2.2	CCR Removal and Documentation	
		2.2.1 Removal Criteria Development	4
		2.2.2 CCR Removal Procedures	5
		2.2.3 Documentation of CCR Removal	7
	2.3	Post-Removal Monitoring	8
3.0	Sum	ımary	9
4.0	Repo	ort Certification	10
5.0	Refe	erences	11

TABLES

Table 1 Sediment Boring Results

FIGURES

Figure 1 Site Layout

Figure 2 Pre-Construction Conditions Site Plan

Figure 3 As-Built Excavation Site Plan Figure 4 Generalized Cross-Section A-A'

APPENDICES

Appendix A Soil Boring Logs



1.0 Introduction

1.1 Closure Overview and Objectives

On April 17, 2015, the United States Environmental Protection Agency (USEPA) published the final rule for the regulation and management of Coal Combustion Residuals (CCR) under the Resource Conservation and Recovery Act (RCRA) (the CCR Rule), as amended. The CCR Rule, which became effective on October 19, 2015, applies to the DTE Electric Company (DTE Electric) River Rouge Power Plant (RRPP) Bottom Ash Basin (BAB). As documented in the October 17, 2016 *Initial Written Closure Plan for a CCR Impoundment - DTE Energy River Rouge Power Plant Bottom Ash Basin* submitted in accordance with §257.102(b) and updated on July 15, 2020, DTE was proceeding to close the RRPP BAB by CCR removal and offsite disposal including decontamination of the unit in accordance with self-implementing requirements of the CCR Rule. This approach was chosen because CCR removal and offsite disposal was considered the most conservative and viable source material management option for the site, offering a high level of long-term performance and reliability.

On behalf of DTE Electric, TRC Engineers Michigan, Inc.(TRC), the engineering entity of TRC, prepared a closure work plan (TRC, May 15, 2020) to demonstrate how closure will be achieved in accordance with the CCR Rule and to request agreement from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) on DTE Electric's plan to remove CCR from the RRPP BAB CCR unit to achieve closure. EGLE approved the closure work plan on June 2, 2020 with the stipulation that post-dredging confirmatory sample cores be collected at a frequency equal to the pre-dredge assessment sample collections.

Initiation of closure of the BAB was driven by DTE Electric's plan to comply with the CCR Rule. The RRPP ceased operating as a coal-fired plant in mid-2020 and will operate in the future utilizing only recycled industrial gas to produce electricity. Therefore, CCR is no longer generated at the RRPP and CCR no longer discharges into the former BAB. The CCR Rule states that all waste streams discharging into a CCR impoundment that is subject to forced closure must cease, and closure of the CCR unit must be initiated by April 11, 2021¹. DTE Electric initiated closure ahead of the specified deadline due to cessation of coal burning.

DTE Electric commenced closure construction activities on June 29, 2020 and completed the removal of CCR from the BAB on September 21, 2020. On behalf of DTE Electric, TRC has prepared this closure certification to demonstrate how the BAB closure was achieved in accordance with the §257.102(c) and Michigan's Natural Resources and Environmental Protection Act (NREPA) Part 115 Solid Waste Management Statute (Part 115) 324.11519b (9). This document provides a description of the following:

- CCR removal procedures;
- Verification of CCR removal; and,

¹ The deadline was revised for all unlined CCR surface impoundments and surface impoundments that fail the aquifer location restriction to initiate closure or retrofit to April 11, 2021; this date replaced the former October 31, 2020 deadline per finalization of EPA's Holistic Approach to Closure Part A: Deadline To Initiate Closure, effective September 28, 2020.



Post-removal performance monitoring.

1.2 Site Overview and Description of CCR Units

The DTE Electric RRPP is located at 1 Belanger Park Drive, within the City of River Rouge in Wayne County, Michigan. The RRPP, including the BAB CCR unit, was originally constructed in the early 1950s on the southern shore of the Rouge River Short Cut Canal and along the west bank of the Detroit River in River Rouge, Michigan. The former BAB, located immediately north of the RRPP and south of the Rouge River Short Cut Canal (Figure 1), was a physical sedimentation basin utilized as an incised CCR surface impoundment that formerly received sluiced bottom ash and other process effluent from the RRPP throughout its operational life.

In 1998, sheet piling was placed around the perimeter of the incised impoundment and the sheets were pushed to a depth of approximately 30 feet below ground surface (ft bgs) into native clay soil. Sluiced ash from the power plant was first pumped to two decanting hydrobin structures; the decanted bottom ash transport water gravity drained to the eastern end of the BAB where it combined with other process flow effluent pumped from the power plant. Discharge water from the former BAB over tops an overflow weir and flows into a weir box structure before draining to a below-grade pump station on the west side of the former BAB.

The remaining pump station contains two sets of centrifugal pumps; one set of pumps recirculates the water back into the plant for reuse, and the other set of pumps discharges the water to a surface water outfall in the overflow canal. The water combines with other site storm and process water effluent authorized via a National Pollution Discharge Elimination System (NPDES) permit, and/or to the combined sewer to the Wayne County Downriver Wastewater Treatment Plant (WWTP) via an Industrial Pretreatment Program (IPP) permit. Settled CCR materials that escaped the hydrobin ash separation process were periodically dredged from the basin throughout its operational lifetime and disposed offsite.

DTE Electric is proactively managing the potential groundwater migration pathway at the RRPP BAB CCR unit using a groundwater extraction system. This operates as an interim response, and consists of 11 groundwater extraction wells installed around the RRPP former BAB. The groundwater extraction system was constructed during January and February 2018, and has been operational and effectively capturing the affected groundwater in the vicinity of the RRPP former BAB since operation began in early March 2018.

1.3 Regulatory Background

As documented in the January 31, 2018 Annual Groundwater Monitoring Report for the River Rouge Power Plant (TRC, January 2018), covering calendar year 2017 activities, DTE Electric noted that boron, fluoride, and pH were observed within groundwater at downgradient monitoring well(s) with statistically significant increases (SSIs) above background limits. Therefore, DTE Electric initiated an assessment monitoring program for the RRPP BAB CCR unit pursuant to §257.95 of the CCR Rule that included sampling and analyzing groundwater within the groundwater monitoring system for all constituents listed in Appendix IV.

As an interim and proactive measure, DTE Electric has been operating a groundwater collection



system since March 2, 2018 to mitigate potential risk of migration of water from the BAB. The installed collection system continues to hydraulically control groundwater flow within the vicinity of the RRPP BAB CCR unit. Groundwater flow from the entire former BAB perimeter is now directed inward toward the extraction wells. DTE Electric intends to address the CCR-affected groundwater by continuing to operate the already-in-place interim groundwater collection system. However, evaluation of the final remedy will continue post-removal of CCR from the former BAB.

As detailed in the 2018 Annual Report (2018 Annual Groundwater Monitoring Report), statistically significant groundwater concentrations were reported above the groundwater protection standards (GWPSs) for Appendix IV constituents arsenic and lithium. Due to the detections of arsenic and lithium at concentrations above their respective GWPSs, an Assessment of Corrective Measures (ACM) was completed on April 14, 2019. Selection of the final remedy is still being evaluated while continuing to operate the interim groundwater extraction system installed and operated since 2018. A Federal CCR Rule - Notice of Alternative Closure per §257.103(b) was completed on December 16, 2019. This Notice set the time frame for shut-down of the RRPP coal-fired boiler(s) in May 2020, cessation of use of the RRPP BAB for CCR management by approximately July 2020, and the initiation of RRPP BAB CCR unit closure by August 31, 2020² (TRC, December 2019). CCR removal was completed within the timeframes specified in the Notice of Alternative Closure, and certified prior to December 28, 2020 in accordance with NREPA Part 115 324.11519b(6) and 324.11519b(8). Therefore, the RRPP BAB CCR unit will not be licensed under Part 115 as the former BAB will no longer be a CCR impoundment on or after December 28, 2020.

_

² The August 31, 2020 deadline was proposed within the EPA's December 2, 2019, Holistic Approach to Closure Part A: Deadline to Initiate Closure. The deadline to initiate closure or retrofit has since been revised for all unlined CCR surface impoundments and surface impoundments that fail the aquifer location restriction to April 11, 2021; this date replaced the former October 31, 2020 deadline per finalization of EPA's Holistic Approach to Closure Part A: Deadline to Initiate Closure (Part A), effective September 28, 2020. In addition, under Part A the process to secure an alternative closure was changed adding §257.103(f)(2) as what would now apply to the RRPP BAB CCR unit.



2.0 Closure by Removal

As presented in Section 1.1, DTE Electric closed the RRPP former BAB by CCR removal and offsite disposal including decontamination of the unit in accordance with self-implementing requirements of the CCR Rule and the EGLE approved closure work plan (TRC, May 15, 2020). A summary of the closure approach and removal documentation is contained herein.

2.1 Summary of Closure Approach

The RRPP BAB was closed by removal of CCR based on proposed design grades and confirmatory sampling; these design grades were based on clearly visible demarcation of CCR and underlying native materials witnessed during pre-construction soil borings.

Specific closure operations involved: (i) CCR removal by wet dredging within the BAB, (ii) removal or decontamination of any areas affected by releases of CCR, (iii) demolition/abandonment/decontamination of associated non-earthen features, and (iv) regrading to final desired grades using borrow soil for fill (in progress).

The lateral boundaries of the BAB are defined by the sheet piling placed around the perimeter of the impoundment. Approximate area of the BAB is 40,000 square feet (SF). The preconstruction site conditions are shown on Figure 2.

Dredging of CCR reached approximate depths of 4 to 12 feet below the pre-construction bathymetric surface within the BAB. Proposed excavation bottom elevation contours and final elevation contours are provided on Figure 3 and a generalized cross-section is provided on Figure 4.

DTE Electric removed the CCR materials through wet excavation (dredging) within the BAB utilizing a combination of mechanical and hydro-excavation methodologies. Due to the physical properties of the CCR observed during construction, the initial mechanical removal approach was modified during construction to a hydro-excavation approach to achieve complete removal of CCR.

2.2 CCR Removal and Documentation

The following section summarizes the removal criteria development and CCR removal and documentation procedures completed. Descriptions of activities to remove CCR and document adequate removal are provided herein.

2.2.1 Removal Criteria Development

DTE Electric closed the former BAB based on the removal criteria described herein and with agreement from EGLE. DTE Electric had a bathymetric survey completed (October 2019), and had confirmatory drilling performed with visual assessments of collected samples (February 2020) to define the horizontal and vertical extent of CCR within the BAB in support of final closure design efforts. Pre-construction bathymetry of CCR within the BAB is depicted on Figure 2. Table 1 summarizes the observed results of the pre-construction confirmatory borings, and locations of borings are shown on Figures 2 and 3. Pre-Construction boring logs of each pre-



construction boring within the BAB is included in Appendix A. Pre-Construction confirmatory drilling included:

- Advancement of ten (10) soil borings until native materials were encountered utilizing a pontoon based Vibra-Core sampler rig to collect soil samples and determine the thickness of CCR within the BAB;
- Collection of samples at each boring location logged according to the unified soil classification system (USCS) and visually evaluated for the presence of CCR; and
- Soil cores were retained for future comparison to post-excavation conditions.

The confirmatory drilling identified CCR extending to a depth of 4 to 11 feet below the existing bathymetric surface within the BAB at a submerged depth of approximately 2 to 14 feet below the water surface depending on location within the BAB. Generally, the submerged depth to CCR and depth to native material was greater on the eastern end of the BAB where routine dredging was performed.

Clear visible demarcation between CCR and underlying native materials was noted in the confirmatory soil boring cores as documented in the boring logs (Appendix A). Native material consisted of silt and sand of distinctly different color and grain size gradation compared to CCR disposed within the BAB and this material difference served as strong visually-identifiable evidence for dredging limits within the BAB.

Therefore, based on the confirmatory drilling results, CCR removal criteria included 1) over excavation of CCR based on pre-excavation CCR design grades; and 2) visual confirmation as described in Section 2.2.3.

2.2.2 CCR Removal Procedures

DTE Electric's selected contractor, Barton Malow Company (BMC) performed the following tasks from June 22, 2020 to September 21, 2020 to effectively remove CCR from the BAB:

- Completed mobilization of construction facilities, material, equipment, and personnel necessary to perform work;
- Installed erosion controls and completed site preparation including the installation of silt fence, silt curtains, and access road improvements required to transport removed CCR to the ash dewatering pad (Figure 2). Site preparation activities were completed from June 22 to June 26, 2020. Full-depth silt curtains were deployed at four locations and maintained throughout the duration of construction at multiple locations within the BAB to ensure compliance with existing NPDES/POTW limits and to control redistribution of CCR during dredging efforts (Figure 3);
- Performed water management activities, which included:
 - Abandonment of CCR process-related inlet pipes at process units. Five CCR process-related inlet pipes were abandoned via physical disconnection of above-grade piping at each process unit to create a physical break. Prior to basin dredging, all remaining below-grade piping leading to the BAB was cleaned via jetting by K2 Industrial to remove residual fluids, solids, and sludges and then abandoned-in-place by filling with



- grout and capping at the former BAB discharge point. Locations of abandoned pipes are shown on Figure 3;
- Maintained remaining process/storm water inlet pipes and flow streams throughout the duration of CCR removal activities from BAB. Process flow entering the basin continued to be routed to the existing pump station on the western end of the basin and through the existing NPDES outfall following water treatment. As an additional measure to ensure compliance with existing NPDES/POTW limits, the height of the overflow weir at the discharge weir box was temporarily raised by installing a metal plate (e.g., "stop logs") and all process flow through the BAB was by-passed and treated prior to entering the weir box structure. BMC utilized a 400 gallon per minute (GPM) water treatment system, consisting of an open top weir tank, sand filtration, and an interchangeable bag filtration system, to treat water during the excavation and backfilling activities within the BAB. The water treatment system was activated prior to water levels exceeding the height of the installed metal plate at the overflow weir, and then once treated, the treated water was routed directly to the weir box structure and below-grade pump station for discharge. NPDES exceedances were not observed during construction activities.
- Removed approximately 11,674 cubic yards of CCR materials via wet excavation (dredging) within the BAB utilizing a combination of mechanical and hydro-excavation methodologies. Excavation goals were achieved once all CCR plus an additional sixinches of underlying soil were removed. Concrete pads were identified within the confines of the former BAB which were decontaminated and left in place. Final elevation contours and the locations of concrete pads are provided on Figure 3 and a generalized cross-section is provided on Figure 4.
 - From June 29, 2020 to July 29, 2020, BMC removed the bulk of CCR materials from BAB via mechanical excavation. BMC's selected subcontractor, Dean Marine and Excavating, Inc. (DME), performed mechanical dredging in the BAB using a hydraulic long reach excavator with a clamshell bucket. For areas that could not be reached from shore, the excavator was placed on a 30-foot by 60-foot sectional barge in the western portion of the basin. Once the material was drained through the clamshell bucket, the dredging material was placed directly into modified off road dump trucks with sealed gates and transported to the existing on-site concrete dewatering/decant pad located west of the BAB. Material dewatered via gravity with water released from the dredged material routed to NPDES Outfall 001E. To improve material stabilization on the decanting pad and to prepare the material for off-site disposal, approximately 296 tons of portland cement was utilized. A total of 10,217 tons of dewatered/stabilized material was transported and disposed of at Sibley Quarry Landfill as part of mechanical removal efforts. During mechanical removal, BMC also removed CCR residuals from all sheet pile cavities/arches and concrete pads remaining within the BAB.
 - From August 11, 2020 to September 21, the remaining fine particulate CCR material residing within the BAB was removed via hydraulic excavation. BMC's selected subcontractor, DME, performed hydraulic dredging in the BAB using a hydraulic dredge attachment (Dragflow HY85A Hydraulic Pump) secured to the GPS-equipped PC300 long reach excavator. For areas that could not be reached from shore, the excavator was placed on a 30-foot by 60-foot sectional barge in the western portion of the basin. As part of the hydraulic dredging scope, an approximately 100-foot by 130-



foot geotube staging area was constructed approximately 450-feet west of the BAB (Figure 1). The geotube staging area was constructed with a sand base, 10-mil sealed visqueen liner, and 2 to 3-foot tall containment berms. Temporary 6-inch diameter high density polyethylene (HDPE) intake and return water lines were installed from the hydraulic dredge equipment to the geotube staging area. Decanted water collected in the containment area was pumped back to the BAB via the temporary HDPE return line. The BAB was separated into halves during hydraulic dredging by the previously installed turbidity curtains in addition to the permanent center weir structure. Focused dredging on each half was performed until CCR removal was complete. The concrete pads were decontaminated using the hydraulic dredging equipment. Generally, a total of two passes was required on each half of the basin to remove remaining CCR. Final bathymetric surveying and confirmatory sampling was completed as documented in Section 2.2.3. Following solidification within the geotubes, a total of 4,138 tons of material from the hydraulic dredging operations was transported and disposed at Sibley Quarry Landfill.

- Completed site restoration activities, which includes completing final grading around the BAB to restore areas to pre-construction grades and placing a stone surface (MDOT 21AA) over disturbed areas and/or dedicated access drives. Silt fence will be removed after closure of the county-issued soil erosion and sedimentation control (SESC) permit anticipated for the construction phase of this project; and
- Demobilization of construction facilities and equipment from the Site.

2.2.3 Documentation of CCR Removal

DTE Electric completed the following CCR removal documentation protocol to satisfy the requirements within §257.102(c):

- 1. As specified in the closure work plan (TRC, May 2020), the primary documentation of CCR removal is by comparing final excavation grades to design grades. Bathymetric survey(s) were completed on August 31, 2020 and September 23, 2020 for the eastern half and western half, respectively. Elevations are based on North American Vertical Datum of 1988 (NAVD88) datum, and coordinates are based on the state plane coordinate system. Proposed excavation grades and as-built excavation grades are displayed on Figure 3 and the generalized cross-section shown on Figure 4. After completion of the two post-removal surveys, TRC reviewed survey documentation and confirmed that design grades were achieved, with exception of the noted concrete pads in the bottom of the basin that were decontaminated as documented in Section 2.2.2;
- 2. After excavation, confirmatory sample cores of the sediment bottom within the basin were collected and examined as secondary documentation of CCR removal. Visual inspection of the core samples was used to augment the post-dredging bathymetric surveys as part of the overall CCR removal verification approach. The presence/absence of CCR in sample cores was based primarily on color and gradation and compared to the retained preconstruction sample cores collected in February 2020. Table 1 summarizes the observed results of the post-construction confirmatory borings and locations of borings are shown on Figures 2 and 3. Post-Construction boring logs of each post-construction boring within the BAB is included in Appendix A. Post-Construction confirmatory drilling included:
 - Advanced soil borings utilizing a pontoon based Macro-Core® tooling sampling tube to verify that the performance criteria of no visual measurable thickness of CCR was



present at the ten (10) verification soil core boring locations in the basin. At select locations, a small amount of CCR was observed in initial post-construction borings that resulted in further hydraulic dredging to remove CCR. A final confirmation boring, specifically samples listed as "POST 2", were collected to demonstrate that CCR was removed. Confirmatory drilling was completed on August 29, 2020 and September 21, 2020 for the eastern and western halves of the BAB, respectively;

- Collection of samples at each boring location logged according to the unified soil classification system (USCS); and,
- Visually evaluated for the presence of CCR which confirmed that the hydraulic dredging successfully completed the removal of the CCR material from the BAB.

2.3 Post-Removal Monitoring

DTE Electric intends to address the CCR-affected groundwater by continuing to operate the already-in-place interim groundwater collection system, however, evaluation of the final remedy will continue post-removal of CCR from the BAB per §257.96 and §257.97 and NREPA Part 115 324.11519c. If the groundwater collection system is selected as part of the final remedy, the system will be operated until the risk of migration of CCR constituents from the RRPP BAB CCR unit to receptors is effectively mitigated and groundwater data demonstrate that groundwater concentrations of Appendix IV constituents are below the relevant GWPSs for three consecutive years of semiannual groundwater monitoring in accordance with §257.98(c).

DTE Electric will continue semiannual assessment monitoring as specified in §257.95 and annual nature and extent monitoring will continue for the RRPP BAB CCR unit per §257.95(g)(1). Groundwater monitoring will be performed in accordance with the existing Quality Assurance Project Plan – DTE Electric Company River Rouge Power Plant Bottom Ash Basin (the QAPP) (TRC, July 2016; revised August 2017) and statistically evaluated per the Groundwater Statistical Evaluation Plan – DTE Electric Company River Rouge Power Plant Coal Combustion Residual Bottom Ash Basin (Stats Plan) (TRC, October 2017).



3.0 Summary

This report presents the summary of removal procedures, documentation, bathymetric survey data, and confirmatory soil core data collected to verify that CCR was removed from the RRPP BAB. TRC reviewed survey documentation and confirmed that design grades were achieved, with exception of the noted concrete pads in the bottom of the basin that were decontaminated as documented in Section 2.2.2. TRC also completed confirmatory sampling of the sediment bottom within the basin as secondary documentation which confirmed that the hydraulic dredging successfully completed the removal of the CCR material from the BAB. Based on the results of field observations and data collection, removal activities were completed to close the RRPP BAB by CCR removal and offsite disposal in accordance with the requirements within §257.102(c) and NREPA Part 115 324.11519b (9), the EGLE approved *Bottom Ash Basin Closure Work Plan (*TRC, May 2020), and within the closure timeframe, with certification of closure prior to December 28, 2020 in accordance with NREPA Part 115 (324.11519b(6) and 324.11519b(8)).



4.0 Report Certification

I, the undersigned Michigan Professional Engineer, hereby certify that I am familiar with the technical requirements of Title 40 Code of Federal Regulations Part 257 Subpart D (§257). I also certify that it is my professional opinion that, to the best of my knowledge, information, and belief, that the information in this report is in accordance with current good and accepted engineering practice(s) and standard(s) and that CCR was removed from the RRPP BAB in accordance with the requirements of §257.102(c) and NREPA Part 115 324.11519b (9).

For the purpose of this document, "certify" and "certification" shall be interpreted and construed to be a "statement of professional opinion." The certification is understood and intended to be an expression of my professional opinion as a Michigan Licensed Professional Engineer, based upon knowledge, information, and belief. The statement(s) of professional opinion are not and shall not be interpreted or construed to be a guarantee or a warranty of the analysis herein.

<u>Name</u>	License Expiration Date	OF WO
David B. McKenzie, P.E.	October 31, 2021	DAVID B * MCKENZIE ENGINEER
Company	<u>Date</u>	No. 6201042332
TRC Engineers Michigan, Inc.	February 1, 2021	February 1, 2021



5.0 References

- DTE Electric Company. October 17, 2016. Closure Plan for Existing CCR Surface Impoundment Per 40 CFR 257.102(b) DTE Energy River Rouge Power Plant Ash Basin, 1 Belanger Park Dr., River Rouge, MI 48218.
- TRC Environmental Corporation. October 2017. Groundwater Monitoring System Summary Report DTE Electric Company River Rouge Power Plant Bottom Ash Basin Coal Combustion Residual Unit, 1 Belanger Park Drive, River Rouge, Michigan. Prepared for DTE Electric Company.
- TRC Environmental Corporation. October 15, 2018(a). Assessment Monitoring Data Summary and Statistical Evaluation, DTE Electric Company, River Rouge Power Plant Bottom Ash Basin CCR Unit, River Rouge, Michigan, letter report prepared for DTE Electric Company.
- TRC Environmental Corporation. October 15, 2018(b). Appendix IV Assessment Monitoring Statistical Evaluation, DTE Electric Company, River Rouge Power Plant Bottom Ash Basin Coal Combustion Residual Unit, technical memorandum prepared for DTE Electric Company.
- TRC Environmental Corporation. January 31, 2019. October 2018 Appendix IV Assessment Monitoring Statistical Evaluation, DTE Electric Company, River Rouge Power Plant, Bottom Ash Basin Coal Combustion Residual Unit, technical memorandum prepared for DTE Electric Company.
- TRC Environmental Corporation. January 31, 2019. 2018 Annual Groundwater Monitoring Report, DTE Electric Company, River Rouge Power Plant, Bottom Ash Basin Coal Combustion Residual Unit. Prepared for DTE Electric Company
- TRC Environmental Corporation. April 15, 2019. Assessment of Corrective Measures Report, DTE Electric Company, River Rouge Power Plant, Bottom Ash Basin Coal Combustion Residual Unit, prepared for DTE Electric Company.
- TRC Environmental Corporation. October 15, 2019. Semi-Annual Progress Report Remedy Selection and Design, DTE Electric Company, River Rouge Power Plant, Bottom Ash Basin Coal Combustion Residual Unit, prepared for DTE Electric Company.
- TRC Environmental Corporation. December 16, 2019. Federal CCR Rule Notice of Alternative Closure Per 40CFR 257.103(b) Letter, DTE Electric Company, River Rouge Power Plant, Bottom Ash Basin Coal Combustion Residual Unit, prepared for DTE Electric Company.
- TRC Environmental Corporation. January 30, 2020. 2019 Annual Groundwater Monitoring Report, DTE Electric Company, River Rouge Power Plant, Bottom Ash Basin Coal Combustion Residual Unit. Prepared for DTE Electric Company
- TRC. May 15, 2020. Bottom Ash Basin Closure Work Plan, DTE Electric Company, River Rouge Power Plant, Bottom Ash Basin Coal Combustion Residual Unit. Prepared for DTE Electric Company



- USEPA. April 2015. 40 CFR Parts 257 and 261. Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule. 80 Federal Register 74 (April 17, 2015), pp. 21301-21501 (80 FR 21301).
- USEPA. July 2018. 40 CFR Part 257. Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Amendments to the National Minimum Criteria (Phase One, Part One); Final Rule. 83 Federal Register 146 (July 30, 2018), pp. 36435-36456 (83 FR 36435).
- USEPA. April 2018. Barnes Johnson (Office of Resource Conservation and Recovery) to James Roewer (c/o Edison Electric Institute) and Douglas Green, Margaret Fawal (Venable LLP). Re: Coal Combustion Residuals Rule Groundwater Monitoring Requirements. April 30, 2018. United States Environmental Protection Agency, Washington, D.C. 20460. Office of Solid Waste and Emergency Response, now the Office of Land and Emergency Management.



Tables

TABLE 1 SEDIMENT BORING RESULTS DTE ELECTRIC COMPANY

RIVER ROUGE POWER PLANT BOTTOM ASH BASIN CLOSURE

							Total Core Thickness	CCR Thickness	Native Material Thickness	
Туре	Sample ID	Basin Location	Northing	Easting	Date	Depth to Sediment (ft)	(ft)	(ft)	(ft)	Native Material Elev. (ft)
Pre-Construction	SB-20-13	East	284777.2925	13463084.48	2/18/2020	10.9	7	7	0	559.3
Pre-Construction	SB-20-14	East	284794.0316	13462999.79	2/18/2020	12.8	6.5	3	3.5	563.0
Pre-Construction	SB-20-15	East	284843.856	13462955.67	2/18/2020	13.0	6.5	5	0.5	559.3
Pre-Construction	SB-20-16	East	284859.9735	13462831.48	2/18/2020	7.2	12.5	11.5	1	554.1
Pre-Construction	SB-20-17	East	284912.1527	13462825.37	2/18/2020	14.0	5.5	5.5	0	557.1
Pre-Construction	SB-20-18	West	285063.0671	13462740.54	2/18/2020	2.5	11.5	9	2.5	565.8
Pre-Construction	SB-20-19	West	285058.9901	13462684.06	2/18/2020	7.0	10	7	3	564.6
Pre-Construction	SB-20-20	West	285004.3734	13462713.28	2/18/2020	6.7	10.5	8	2.5	564.4
Pre-Construction	SB-20-21	West	284939.7125	13462726.68	2/18/2020	10.0	6.5	5.25	1.25	566.5
Pre-Construction	SB-20-22	West	284940.2677	13462783.4	2/18/2020	8.0	8.5	8	0.5	563.3
Confirmation Boring	SB-20-13-POST	East	284777.2925	13463084.48	8/29/2020	20.3	10 inches	0	10 inches	557.8
Confirmation Boring	SB-20-14-POST	East	284794.0316	13462999.79	8/29/2020	16.9	5 inches	0	5 inches	561.1
Confirmation Boring	SB-20-15-POST 2	East	284843.856	13462955.67	8/29/2020	19.9	19 inches	0	19 inches	558.1
Confirmation Boring	SB-20-16-POST 2	East	284859.9735	13462831.48	8/29/2020	24.4	21 inches	0	21 inches	553.6
Confirmation Boring	SB-20-17-POST	East	284912.1527	13462825.37	8/29/2020	21.5	18 inches	0	18 inches	556.5
Confirmation Boring	SB-20-18-POST	West	285063.0671	13462740.54	9/21/2020	12.9	18 inches	0	18 inches	563.5
Confirmation Boring	SB-20-19-POST	West	285058.9901	13462684.06	9/21/2020	13.9	24 inches	0	24 inches	562.5
Confirmation Boring	SB-20-20-POST 2	West	285004.3734	13462713.28	9/21/2020	13.7	18 inches	0	18 inches	562.7
Confirmation Boring	SB-20-21-POST 2	West	284939.7125	13462726.68	9/21/2020	15.3	7 inches	0	7 inches	561.1
Confirmation Boring	SB-20-22-POST 2	West	284940.2677	13462783.4	9/21/2020	15.9	12 inches	0	12 inches	560.5

Notes:

1. Northing and Easting are reported as Michigan State Plane Coordinates.

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

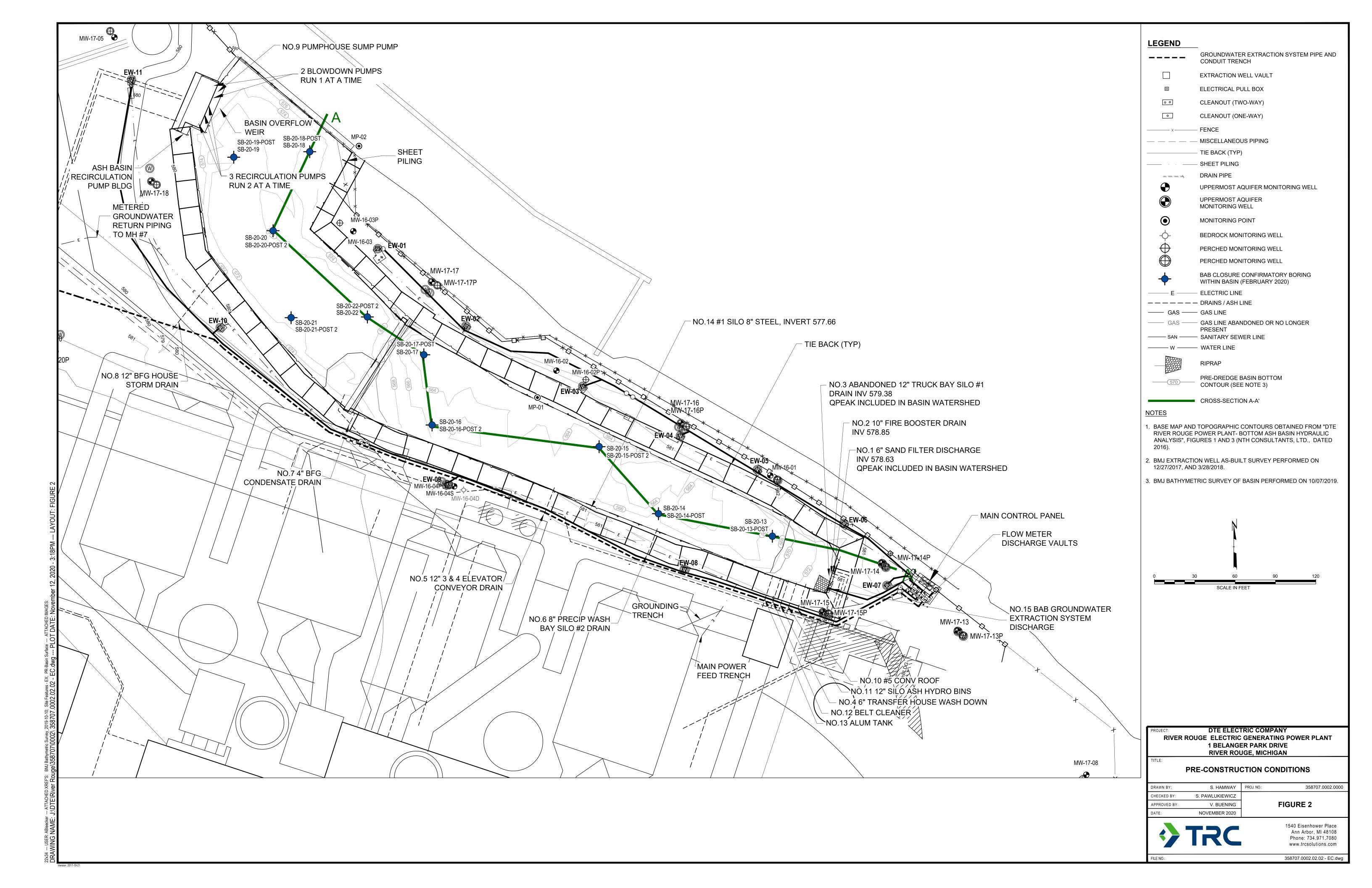
NA - not applicable

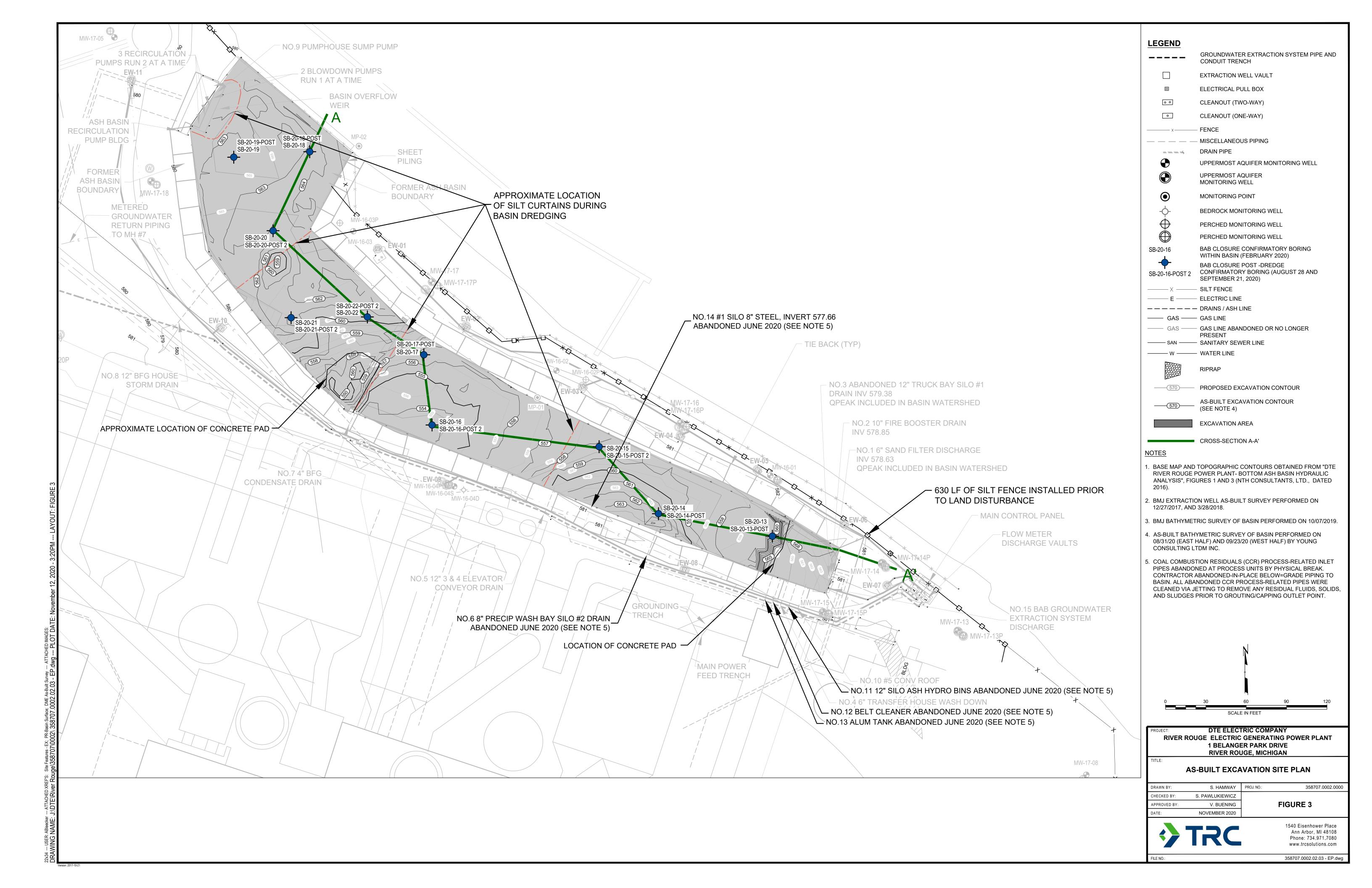
NM - not measured

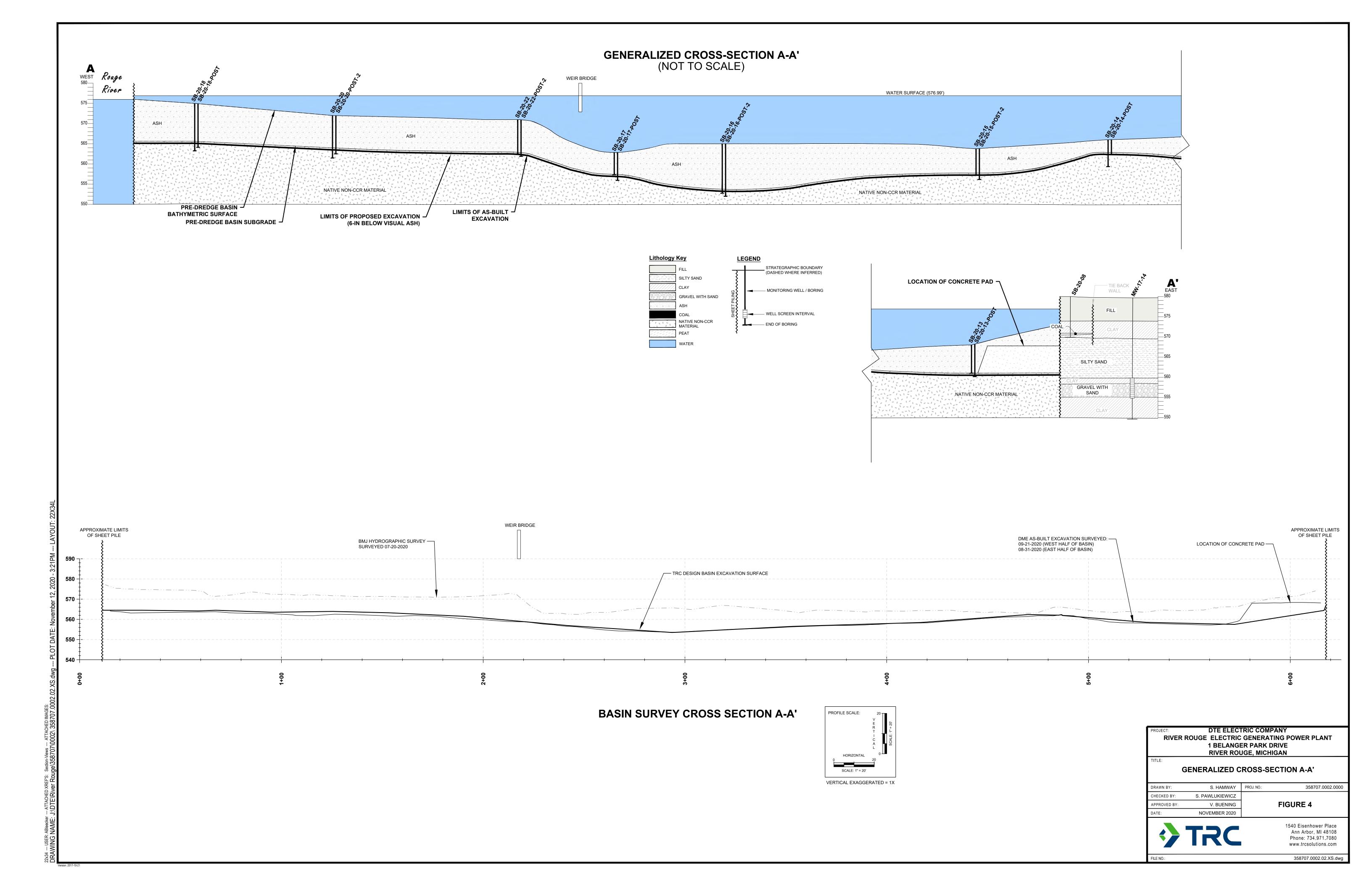


Figures











Appendix A Soil Boring Logs

		1		3			SOIL BOP	RING LOG							
5	1			30						BOI	RING		. SB-20 Page 1 of		
Facili	ty/Proje	ct Nam	e:					Date Drilling Started	:	Date Drilling	Comple		Project No		
	DT	E Ele	ctric C	Company B	ottom Ash	n Basin Clo	osure	2/18/2020		2/18/	2020		358	707.0	001
Drillin	g Firm:				Drilling Meth			Surface Elev. (ft)	TOC	Elevation (ft)	Total	Depth (ft bgs) Bo	rehole	Dia. (in)
	Job	Site	Servi	ces		Vibra Co	re					18.0		2	1
Borin	g Locati				et from east	end of basir	n, 15 feet from	Personnel	!		Drillin	g Equip	ment:		
1		no	orth sho	ore of basin.				Logged By - Jake h Driller - Dave Mokn					Vibra Co	ore	
Civil	Town/Ci	ity/or Vi	llage:	County:		State:		Water Level Observ							
	River	Roug	_	\/\/a	iyne	Mid	chigan	While Drilling: After Drilling:		/Time /Time			Depth (ft Depth (ft		
	/PLE	ltoug		VVG	iyiic	IVII	Jiligan	Aiter Drilling.	Date	/ Time			Deptii (it	. bgs)	
- C/ (II	/// <u></u>	-													
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			[LITHOLOGI DESCRIPTIO	ON			nscs	GRAPHIC LOG	CON	MMEI	NTS
1 CS	40		2—	ASH Mo	ostly coal a	ash, black	of the sample elow the water	€.	ely 10	Teet.			Water surfs 576.9 feet. 566.3 feet. Native Mats 559.3 feet.		
0:		Λ.		, ,				540.5					4.0=4.==	.00	
Signa	ature:	(fral	fr					540 Eisenhower I nn Arbor, MI 481					4-971-70 34-971-90		Phone Fax

				20			SOIL BO	RING LOG	_	OD!!!C	N/C	05.	20 44	. D	
>				T					Е	BORING	NÖ.				
Facility	//Proje	ct Name	e:					Date Drilling Started	:	Date Drilling	Comple		Page 2	t Number:	
•				Company F	Bottom Ash	Basin Clo	osure	8/29/2020			2020			565.0002.	.0000
Drilling	Firm:				Drilling Metho			Surface Elev. (ft)		levation (ft)		Depth (Borehole Di	
	Job	Site	Servi	ices		Direct Pu	sh					20.1		3	
Boring				cation as SB-				Personnel	ļ		Drillin	g Equip	ment:		
								Logged By - Jake h				ш	and Ir	nstalled	
Civil T	own/Ci	ty/or Vi	llage:	County:		State:		Water Level Observ				1 10	anu n	istalieu	
								While Drilling:	Date/					h (ft bgs)	
		Roug	e T	VVa	ayne	IVII	chigan	After Drilling:	Date/	Time			Dept	h (ft bgs)	
SAM	PLE														
	%	NTS					LITHOLOG					90	ر	COMMEN	TS
싪	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			[DESCRIPTI	ON				GRAPHIC LOG		, O IVIIVILIY	
NUMBER AND TYPE	Š	N N	표								જ	\PH			
PR	REC	BLC	DEF								nscs	GR/			
\neg				Water [Depth to nat	tive mate	rial from wat	ter surface is 20.	25 fee	t.				surface elevation	on is
			-	-									578.0 f	reet.	
			-	1											
			2-	1											
			-	-											
			-	1											
			4-												
			-	_											
			-	1											
			6-												
			-	-											
			-	1											
			8-	1											
			-	-											
			-	1											
			10-]											
			-	4											
			-	1											
			12-]											
			-	1											
			-	1											
			14-	1											
			-	1											
			-	1											
16-															
			-	1											
			18-	<u> </u>											
			-	1											
			-	1											
1			20 -	CIAV	moetly clay	low to m	adium plast	icity gray (10VD	5/1\		CL	///	Nativo	Material Eleva	ation is
CLAY mostly clay, low to						, iow to iii	edidili piasi	iony, gray (101K	Ji 1),	/_	GW	6 Ú	557.8 f		1110111S
GRAVEL WITH SAND mo					ND most	ly medium g	gravel, some med	dium to	/						
			22 –	∖coarse :	sand, browi	n (10YR 5	5/3), saturat	ed, loose.							
	End of Boring 10 inches b						ow the botto	om of the basin.							
		Λ.	0				Г <u>.</u>								
Signat	ure:	1pol	L	mg				1540 Eisenhower I Ann Arbor, MI 481						-7080 P I-9022	hone? Fax
	,	7	/				<i>F</i>	AIIII AIDOI, IVII 481	UU			13) +- 9/	1-3022	ıax

		1				SOIL BOR	RING LOG							
1	1			\mathbf{RC}					BOF	RING		. SB- Page 1	20-14	
Faci	lity/Projed	ct Name	e:				Date Drilling Started:		Date Drilling	Comple			t Number:	
				Company Bottom As	h Basin C	losure	2/18/2020			2020			58707.0	
Drilli	ng Firm:			Drilling Me	thod:		Surface Elev. (ft)	TOCE	Elevation (ft)	Total	Depth (ft bgs)	Borehole	Dia. (in)
		Site			Vibra Co						19.5		4	4
Bori	ng Locati			of basin, 135 feet from ea of basin.	est end of ba	sin, 15 feet	Personnel Logged By - Jake K Driller - Dave Mokm			Drillin	g Equip	_{ment:} Vibra	Core	
	Town/Ci			County:	State:	: . l. :	Water Level Observa	Date	/Time				n (ft bgs)	
_	River	Roug	e	Wayne	M	ichigan	After Drilling:	Date	/Time			Depth	n (ft bgs)	
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			LITHOLOGI DESCRIPTIO				nscs	GRAPHIC LOG	С	OMME	NTS
SOIL BORING WELL CONSTRUCTION LOG DTE EC RRPP BAB CLOSURE CONFIRMATORY BORINGS(1), GPJ 358707,0001 2/1/21 SOL BORING WELL CONSTRUCTION LOG DTE EC RRPP BAB CLOSURE CONFIRMATORY BORINGS(1), GPJ 358707,0001 2/1/21	90		2	Water Depth to s feet. ASH Mostly coal SAND Mostly findense. CLAYEY SAND in plasticity, gray (1) End of boring at the same series of the same s	e to mediu	k (10YR 2/1), im sand, gray to medium s moist to wet,	wet, loose.	, med	lium	SP CL		576.9 fe	eet. Material Ele	
SOIL BORING	nature:	pol	Z	my			540 Eisenhower I nn Arbor, MI 4810					4-971 34-971		Phone Fax

				36			SOIL BO	RING LOG							
1	1			२ C					ļ	BORING	NO.		20-14 Page 1		
Faci	ility/Proje							Date Drilling Started:		Date Drilling			Projec	t Number:	
D :		E Ele	ctric (Company E			osure	8/29/2020			2020	D 11 /		565.0002	
Drilli	ing Firm:	Cito	Cond	iooo	Drilling Met		ah	Surface Elev. (ft)	TOC	Elevation (ft)	lotal	Depth (ft bgs)	Borehole D	. ,
Bori		Site		cation as SB-	-20-14	Direct Pu	Sn	Personnel			Drilling	16.3 g Equip	ment [.]	3	l
					20 11.			Logged By - Jake K Driller - Dave Mokn	na		J			nstalled	
Civil	Town/C River	-	_	County:	ayne	State:	chigan	Water Level Observation While Drilling: After Drilling:	Date	e/Time e/Time				h (ft bgs) h (ft bgs)	
SA	MPLE				.,		g	, atter 21 ming.	Date	,,			200.	(295)	
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET				LITHOLOG DESCRIPTI				nscs	GRAPHIC LOG	С	OMMEN	ITS
				Water D	Depth to n	ative mate	rial from wat	er surface is 16.8	88 fee	et.			Water : 578.0 f	surface elevat eet.	tion is
SOIL BORING WELL CONSTRUCTION LOG DTE EC RRPP BAB CLOSURE CONFIRMATORY BORINGS(1).GPJ 367565,0002,0000 2/1/21	97 T		2	GRAVE brown (ed, soft. L WITH S 10YR 5/3	AND most), saturated	lly medium g d, loose.	ray (10YR 5/1), m ravel, some coar om of the basin.		//	CL GP		Native 561.1 f	Material Eleva	ation is
Ä NG NG NG NG		Λ													
Sign	nature:	hal	L	mg				540 Eisenhower							Phone
SC		1	/	//			<u> </u>	Ann Arbor, MI 481	บช			73	54-9/1	-9022	Fax

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

							SOIL BOP	RING LOG							
5	1			RC						BOF	RING		. SB- Page 1	20-15	
Faci	lity/Proje	ct Name	e:					Date Drilling Started:	:	Date Drilling	Comple			t Number:	
	DTI	E Ele	ctric (Company B	ottom Ash	Basin Clo	osure	2/18/2020		2/18/	2020		3	58707.000)1
Drilli	ng Firm:				Drilling Metho	od:		Surface Elev. (ft)	TOCE	Elevation (ft)	Total I	Depth (ft bgs)	Borehole Dia	i. (in)
	Job	Site	Servi	ces		Vibra Co	re					19.5		4	
Borii	ng Locati				from east end	of basin, 1	0 feet from	Personnel	_		Drilling	g Equip	ment:		
		nc	orth sho	ore of basin.				Logged By - Jake K Driller - Dave Mokn					Vibra	Core	
Civil	Town/Ci	ty/or Vi	llage:	County:		State:		Water Level Observa	ations:						
	River l	Roug	е	Wa	iyne	Mid	chigan	While Drilling: After Drilling:		/Time /Time				h (ft bgs) h (ft bgs)	
SA	MPLE														
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET				LITHOLOGI DESCRIPTIO				nscs	GRAPHIC LOG	С	OMMENT	·S
				Water D	epth to see	diment fro	om water sur	face approximate	ely 13	feet.			Water s	surface elevation	n is
MATORY BORINGS(1).GPJ 358707.0001 2/1/21 β \rightarrow	90		5—	ASH M	ostly coal a	ısh, black	(10YR 2/1),	wet, loose.					564.3 f		
SOIL BORING WELL CONSTRUCTION LOG DTE EC RRPP BAB CLOSURE CONFIRMATORY BORINGS(1),GPJ 358707.0001 2/1/21			-15— 20—	GRAVE coarse s	L WITH SA sand, dark	ND Most gray, (10`		e to some mediu , loose.	um to		GP			Material Elevatic	on is
RING		Λ													
Sign	ature:	pol	L	mg				1540 Eisenhower Ann Arbor, MI 481						-7080 Ph 1-9022	none Fax
ĭ	/	7	,	//			,	, ivii +0 i					J-1-01	. 0022	

				RC			SOIL BOI	RING LOG	_					
7				TC					В	ORING N	O. S		-15 Post 2	2
_	ity/Proje							Date Drilling Started	d:	Date Drilling	Comple		Page 1 of 1 Project Number	er:
		E Ele	ctric (Company E			osure	8/29/2020			2020		367565.00	
Drillin	ng Firm:	0	•		Drilling Met			Surface Elev. (ft)	TOC	Elevation (ft)	Total			le Dia. (in)
Borin		Site		ces cation as SB-	20-15	Direct Pu	sn	Personnel			Drillin	20.5 g Equip		
								Logged By - Jake I Driller - Dave Moki	ma				and Installe	d
	Town/Ci River I			County:	ayne	State:	chigan	Water Level Observ While Drilling: After Drilling:	Date	e/Time e/Time			Depth (ft bgs	
-	MPLE	J			<u>, </u>			, ,						,
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET				LITHOLOG DESCRIPTIO				NSCS	GRAPHIC LOG	СОММ	ENTS
			-	Water [epth to n	ative mate	rial from wat	er surface is 19.	95 fe	et.			Water surface e 578.0 feet.	levation is
001.000E.000E.0000 E.ITE.1			5-	-										
			10-											
			15-											
10 — GRAVEL WITH SAND mostly coarse sand, dark gray (10Y) CLAY mostly clay, low to me saturated, soft. End of boring at 19 inches be							/R 4/3), satu ledium plasti	rated, loose. city, brown (10Y	'R 5/3	/	CL		Native Material I 558.1 feet.	Elevation is
Signa	ature:	pol	D	~~				1540 Eisenhower Ann Arbor, MI 481		1			34-971-7080 34-971-9022	Phone Fax

		100					SOIL BOI	RING LOG							
1				RC						вог	RING	NO.	SB-	20-16	
													Page 1		
Facil	ity/Proje							Date Drilling Started:		Date Drilling				t Number:	
Deillie		E Ele	ctric (Company Bo	ottom Ash Drilling Metho		osure	2/18/2020	TOC	2/18/ Elevation (ft)	2020	Depth (58707.0001	
Drillin	ng Firm:	Site	Soni	1		ou. Vibra Co	uro.	Surface Elev. (ft)	1001	()	Total	19.5	it bgs)	Borehole Dia. (iii)
Borin				of basin, 60 fee				Personnel			Drillin	g Equip	ment:	- 4	
				ore of basin.		3 ,		Logged By - Jake K Driller - Dave Mokm			,		Vibra	Core	
Civil	Town/Ci	ty/or Vi	llage:	County:		State:		Water Level Observa	ations:	_					
	River	Roug	е	Way	/ne	Mi	chigan	While Drilling: After Drilling:		/Time /Time				h (ft bgs) h (ft bgs)	
SAI	MPLE														
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			I	LITHOLOG DESCRIPTIO				nscs	GRAPHIC LOG	C	OMMENTS	
				Water De	epth to sec	diment fro	om water sur	face approximate	ely 11	feet.			Water : 576.9 f	surface elevation is	
SOIL BORING WELL CONSTRUCTION LOG DTE EC RRPP BAB CLOSURE CONFIRMATORY BORINGS(1),GPJ 358707.0001 2/1/21	55		5 — 5 — 10 — 15 — 20 — 25 — 25 — 5	SAND M	lostly fine nell fragme	to mediu	m sand, grayent.	/ (10YR 5/1), moi	ist to	wet,	SP		565.6 Native 554.1 f	Material Elevation eet.	is
Signa	ature.	1		, <u> </u>			Firm: TRC 1	1540 Eisenhower	Place			73	<u></u> 84_071	-7080 Pho	ne
SOIL		yral !	fr					Ann Arbor, MI 481							ax

		1			30		SOIL BOI	RING LOG						
5	Ī				RC				В	ORING N	O. S			
	ity/Pro							Date Drilling Started:	:	Date Drilling	Comple	eted:	Page 1 Project	Number:
	D.	TE	Elec	ctric (Company B	ottom Asl	n Basin Closure	8/29/2020		8/29/	2020		3675	65.0002.0000
Drillin	ng Firn	n:				Drilling Metl	nod:	Surface Elev. (ft)	TOC	Elevation (ft)	Total	Depth (ft bgs)	Borehole Dia. (in)
				Servi			Direct Push					25.1		3
Borin	g Loc	ation	: Sa	ıme lo	cation as SB-	20-16.		Personnel Logged By - Jake K	(renz		Drillin	g Equip	ment:	
								Driller - Dave Mokn				Н	and In	stalled
Civil	Town/	City/	or Vil	lage:	County:		State:	Water Level Observa		e/Time			Denth	(ft bgs)
	Rive	r Ro	ouge	9	Wa	iyne	Michigan	After Drilling:		e/Time				(ft bgs)
SAI	MPLE													
	(%)		SLI	Ë			LITHOLOG	IC				ပ္ခ	0	ON 45 45 N.T.O.
٣~ ا	RECOVERY (%)		BLOW COUNTS	DEPTH IN FEET			DESCRIPTION					GRAPHIC LOG	C	OMMENTS
	OVE.		×	王							ι,	Ĭ		
NUMBER AND TYPE	REC		BLO	DEP							nscs	GRA		
					Water D	epth to na	ative material from wat	er surface is 24.3	33 fe	et.			Water s 578.0 fe	urface elevation is
				-							370.010	Ct.		
				-										
				-										
				_										
				5-										
				Ü										
				_										
				-										
				-										
				-										
				10 —										
				_										
5														
				-										
				-										
				15 —										
				_										
				_										
9				_										
				_										
				20 —										
				-										
				-										
				-										
				_										
		\dashv		0-	SAND r	mostly fine	e to medium sand, gray	/ (10YR 5/1), sat	urate	d, /	SP	777		Material Elevation is
1 NDIST	- 100			25 —	\loose.	-		,			CL		553.6 fe	el.
	1	\dashv		-	L CLAY n √saturate		, low to medium plasti	city, gray (10YR	5/1),	_		Y///		
				-			1 inches below the bo	ttom of the basin	١.					

 Signature:
 Image: Firm: TRC 1540 Eisenhower Place Ann Arbor, MI 48108
 734-971-7080 Phone 734-971-9022
 Phone Fax

		1					SOIL BO	RING LOG							
1	1			20						BO	RING		. SB -	- 20-17	
Faci	lity/Proje	ct Name	e:					Date Drilling Started	d:	Date Drilling	Comple			t Number:	
		E Ele	ctric (Company E		h Basin Cl	osure	2/18/2020			2020			58707.0	
Drilli	ing Firm:	0	•		Drilling Me			Surface Elev. (ft)	TOC	Elevation (ft)	Total	Depth (ft bgs)	Borehole I	
Bori		Site			not pact of h	Vibra Co ridge weir, 15		Personnel			Drillin	19.5 g Equip	mont:	4	
		nc	orth sh	ore of basin.	eet east of b	inage well, it	J leet Holli	Logged By - Jake Driller - Dave Mok	ma		וווווווין		Vibra	Core	
	Town/C			County:	ayne	State:	chigan	Water Level Observ While Drilling: After Drilling:	Date	e/Time e/Time				h (ft bgs) h (ft bgs)	
	MPLE	ltoug		770	дуно	1411	orngan	7 ater Brilling.	Date	, Time			Ворг	ii (it bgs)	
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET				LITHOLOG DESCRIPTI	ON			nscs	GRAPHIC LOG	С	OMMEN	NTS
atory borings(1),GPJ 358707.0001 2/1/21 β a	70		5-					rface approxima	y				576.9 f	eet.	
SOIL BORING WELL CONSTRUCTION LOG DTE EC RRPP BAB CLOSURE CONFIRMATORY BOR			15-				x (10YR 2/1)	, wet, loose.					557.1 f Eviden	Material Elev	the
ORIN.		Λ,	0				F: TD0	15105:							Di
Soll E	nature:	You	L	~~~				1540 Eisenhower Ann Arbor, MI 48						-7080 1-9022	Phone Fax

					36			SOIL BOR	RING LOG						
	4				20					I	BORING	NO.	SB-2	20-17	' Post
									D + D : II: O + + +		D (D ::::	0 1		Page 1	
	Facili	ty/Proje			Company F	Bottom Ash	Basin Cl	ocuro	Date Drilling Started: 8/29/2020		Date Drilling	Comple 2020	tea:		t Number: 565.0002.0000
	Drillin	ו ט ig Firm:		ouio (Joinparty L	Drilling Metho		USUI C	Surface Elev. (ft)	TOCI	Elevation (ft)		Depth (1		Borehole Dia. (in)
			Site	Servi	ces		Direct Pu	sh					22.0	,	3
	Borin	g Locat	on: Sa	ame lo	cation as SB-	-20-17.			Personnel			Drilling	g Equip	ment:	
									Logged By - Jake K Driller - Dave Mokm				На	and In	stalled
	Civil	Town/C	ty/or Vi	llage:	County:		State:		Water Level Observa		/Time			Dont	h (ft bgs)
	ı	River	Roug	е	Wa	ayne	Mie	chigan	After Drilling:		/Time				n (ft bgs)
	SAN	/IPLE													
		(%	ဟု	h				LITUOLOGI	10				(0		
	Ш	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET				LITHOLOGI DESCRIPTION					GRAPHIC LOG	С	OMMENTS
	BER TYP	OVE	⊘	H								ω	PHIC		
	NUMBER AND TYPE	REC	BLO	DEP								nscs	GRA		
					Water D	Depth to na	tive mate	rial from wat	er surface is 21.5	feet	-			Water s	surface elevation is
				-										370.016	5 6 t.
				-											
				_											
				_											
				5-	-										
/1/21				-	<u> </u>										
200				-											
DTE EC RRPP BAB CLOSURE CONFIRMATORY BORINGS(1).GPJ 367565.0002.0000 2/1/21				_	_										
565.00															
3675				-											
.GPJ				10 -											
GS(1)				-											
ORIN				_											
RY B				_											
MATC															
NFIR				-											
E CO				15 –											
SUR				-											
3 CLC				_											
P BAE				_											
RRP															
E EC				-	-										
G DT				20 -	<u> </u>										
N LO				-											
CTIO	1			-			, low to m	edium plasti	city, brown (10YF	R 5/3)),			Native I	Material Elevation is eet.
STÆU	NDIST	100			saturate							CL		550.0 10	
CON				-	End of I	boring at 1.	5 feet bel	low the botto	m of the basin.						
SOIL BORING WELL CONSTRUCTION LOG				-	1										
NG V															
BOR	Signa	ature:	1.0.	7				Firm: TRC	1540 Eisenhower	Place	<u> </u>		73	34-971	1-7080 Phone
SOIL			proc	p					Ann Arbor, MI 481						1-9022 Fax

				1			SOIL BOR	RING LOG						
5	1			20						BO	RING			20-18
	lity/Projed							Date Drilling Started:		Date Drilling	Comple		Page 1	of 1 t Number:
I aci				Sampany B	ottom Ash	Basin Cl	001150							58707.0001
Drilli	ווט ng Firm:	= Ele	ciric (ompany B	Bottom Ash Drilling Metho		osure	2/18/2020 Surface Elev. (ft)		∠/ ۱8/ Elevation (ft)	2020	Depth (Borehole Dia. (in)
		0:4-	0:		"			Surface Elev. (II)	1001		Total		it bys)	. ,
Danis			Servi			Vibra Co		 D			Deillie	14.0		4
БОП	ng Locau		river.	or basin, ou le	et east of pur	np nouse, s	oo leet south	Personnel Logged By - Jake K Driller - Dave Mokm				g Equip	vibra	Core
	Town/Ci			County:		State:		Water Level Observa While Drilling:	Date	/Time				h (ft bgs)
	River	Roug	e 	vva	iyne	IVII	chigan	After Drilling:	Date	/Time	_		Depti	h (ft bgs)
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			ו	LITHOLOGI DESCRIPTIO	IC ON			NSCS	GRAPHIC LOG	С	OMMENTS
			-	Water D feet.	epth to se	diment fro	om water sur	face is approxim	ately	2			Water : 576.9 f	surface elevation is eet.
SOIL BORING WELL CONSTRUCTION LOG DTE EC RRPP BAB CLOSURE CONFIRMATORY BORINGS(1),GPJ 358707,0001 2/1/21	65		2	SILTY O (10YR 5	CLAY Most 5/1), wet, ve	ly clay, lit ery soft. tly fine sa		silt, low plasticity, gray (10YR 5/1),			CL- ML		574.8 fo	Material Elevation is
RING		Λ	^								1			
Sign Sign	ature:	pol	L					1540 Eisenhower Ann Arbor, MI 481)				1-7080 Phone 1-9022 Fax

4	1	7		२ C			SOIL BOI	RING LOG		BORING	NO.	SB-2	20-18	B Post
				10						DOMINO	140.		Page 1	
Facility	//Projed	ct Nam	e:					Date Drilling Started:		Date Drilling	Comple		Projec	t Number:
	DTI	E Ele	ctric (Company E	Bottom As	sh Basin Cl	osure	9/21/2020		9/21/	2020		367	565.0002.000
Drilling				1 7	Drilling Me			Surface Elev. (ft)	TOC	Elevation (ft)	Total	Depth (Borehole Dia. (ir
	Job	Site	Serv	ices		Direct Pu	ısh					15.0		3
Boring	Locati	on: Sa	ame lo	cation as SB-	-20-18.			Personnel	!		Drillin	g Equip	ment:	
								Logged By - Jake K Driller - Dave Mokn				Н	and Ir	nstalled
Civil To	own/Ci	tv/or Vi	llage:	County:		State:		Water Level Observa					and n	istanca
								While Drilling:		/Time				h (ft bgs)
SAMI	River I	Roug	e	VVa	ayne	IVII	chigan	After Drilling:	Date	/Time			Dept	h (ft bgs)
JAIVII	FLL													
	(9)	တ										(D		
	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET				LITHOLOGI DESCRIPTION					GRAPHIC LOG	C	OMMENTS
NUMBER AND TYPE	VER	8	Z				DESCINII III	JI V				잍		
MB D T	Ó	NO O	l H								nscs	\\X		
N A	R	BL	出								Sn	9		
			-	Water [Depth to r	native mate	rial from wat	er surface is 12.9	92 fe	et.			Water : 576.4 f	surface elevation is eet.
			-	1										
			-	1										
			2-	1										
]										
			_											
			4-	1										
			-	-										
			-	1										
			-	1										
			6-	1										
]										
			-											
			8-	-										
			-	-										
			-	1										
			-	†										
			10-]										
]										
			-	1										
			12-	1										
			-	1										
\Box			-			ay, low to m	edium plasti	city, gray (10YR	5/1),		CL			Material Elevation is
1 DIST	100		·	saturate			<u>.</u>				CL		563.5 f	eet.
			14-			nostly clay, rated, soft.	and, low plasticity	, gra	y	CL				
			_				ttom of the basin	_						
			-		oomig at	10 11101100 1	30.017 11.0 50		•					
			16-	1										
			-	+										
			-	-										
			-	1										
			18-]										
			-	1										
			.	-										
		۸		<u> </u>										
Signat	ure:	land						540 Eisenhower I						-7080 Phon
	,	provide	P				A	nn Arbor, MI 481	80			73	34-971	I-9022 Fa

Γ	A	N.						SOIL BOR	RING LOG						
	1	1			२ C									. SB- Page 1	20-19 of 1
F	acilit	-	ct Name						Date Drilling Started		Date Drilling				t Number:
L	N-: III:		E Elec	ctric (Company E	Bottom Ash Drilling Metl		osure	2/18/2020		2/18/ Elevation (ft)				58707.0001 Borehole Dia. (in)
٦	JI IIII I Q	g Firm: Joh	Site	Servi	ces	Drilling Meti	Vibra Co	ire	Surface Elev. (ft)	100	===	Total	Depth (¹	it bgs)	4
E	Boring		on: Int	terior o	of basin, 60 fe	eet south of r	_		Personnel			Drillin	g Equip	ment:	•
	N 11 T				st sheet piling	g. 	T 01 1		Logged By - Jake h Driller - Dave Mokr	na				Vibra	Core
			ty/or Vil Rouge		County:	ayne	State:	chigan	Water Level Observ While Drilling: After Drilling:	Date	e/Time e/Time				n (ft bgs) n (ft bgs)
T	SAM					<u>, </u>									· · · · ·
O L	AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			I	LITHOLOGI DESCRIPTIO				nscs	GRAPHIC LOG	С	OMMENTS
				-	Water D	Depth to se	ediment fro	om water sur	face approximat	ely 5	feet.			Water s 576.9 fe	surface elevation is eet.
SOIL BORING WELL CONSTRUCTION LOG DTE EC RRPP BAB CLOSURE CONFIRMATORY BORINGS(1),GPJ 358707,0001 2/1/21	1 99	90		2- 2- 4- - - - - - - - - - - - - - - - -				k (10YR 2/1),	wet, loose.			SP		571.6 fo Native 564.6 fo	Material Elevation is
G WELL CONSTRUCTION LOG DTE E				16 — - - - 18 — - -	plasticit	ty, brown (10ÝR 5/3)	little to some , moist soft. ow the water	fine to medium	sand,	low	ML			
ORIN			A .	$\overline{\Delta}$											
SOILE	Signat	ture:	prol	L	~~				I540 Eisenhower Ann Arbor, MI 481						-7080 Phone I-9022 Fax

					36			SOIL BOR	RING LOG						
	5	1			२ C					I	BORING	NO.		20-19 Page 1	
	Facili	ty/Proje							Date Drilling Started:	:	Date Drilling		eted:	Projec	t Number:
	Drillin	DT g Firm:	E Ele	ctric (Company E	Bottom Ash Drilling Metl		osure	9/21/2020 Surface Elev. (ft)	TOC	9/21/ Elevation (ft)	2020	Depth (1		565.0002.0000 Borehole Dia. (in)
	ווווווו		Site	Servi	ces	Drilling Wet	Direct Pu	ısh	Surface Liev. (it)	1001		Total	16.6	it bys)	3
١	Borin				cation as SB-	-20-19.			Personnel			Drillin	g Equip	ment:	
									Logged By - Jake K Driller - Dave Mokn				Н	and Ir	stalled
	Civil	Fown/C	ty/or Vi	lage:	County:		State:		Water Level Observa		e/Time			Dont	h (ft bgs)
		River	Roug	е	Wa	ayne	Mi	chigan	After Drilling:		e/Time	ı			n (ft bgs)
	SAN	/IPLE													
	NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			١	LITHOLOGI DESCRIPTIO				nscs	GRAPHIC LOG	С	OMMENTS
				-	Water D	Depth to na	ative mate	rial from wat	er surface is 13.9	95 fee	et.			Water s 576.4 fe	surface elevation is
SOIL BORING WELL CONSTRUCTION LOG DTE EERRPP BAB CLOSURE CONFIRMATORY BORINGS(1), GPJ 367565.0002.0000 2/1/21	1 NDIST	100		2- 2- 4- - - - - - - - - - - - - - - - -	very sof SANDY \plasticit	ft. CLAY mo y, brown (ostly clay, 10YR 5/3)	little to some , moist soft.	ray (10YR 4/3), s fine to medium ttom of the basin	sand,		, CL ,		Native 562.5 fo	Material Elevation is seet.
IL BORING WELL CONST	Signa	ature:	Tool	18-					540 Eisenhower						-7080 Phone
SO			1					/	Ann Arbor, MI 481	80			73	34-971	I-9022 Fax

							SOIL BO	RING LOG						
5	1			30						BOF	RING	NO	. SB	- 20-20
Facili	ty/Proje	ct Nam	e:					Date Drilling Started	:	Date Drilling	Comple	eted:		ct Number:
		E Ele	ctric (Company E			losure	2/18/2020		2/18/				58707.0001
Drillin	ng Firm:	0.1	_		Drilling Met			Surface Elev. (ft)	TOC	Elevation (ft)	Total	Depth (Borehole Dia. (in)
Borin			Servi		ovimate mid	Vibra Co	ore side of basin.	Personnel			Drillin	17.5 g Equip		4
					Oximate mid		side of pasifi.	Logged By - Jake h Driller - Dave Mokn	na		Dillilli			Core
	Town/Ci River			County:	ayne	State:	ichigan	Water Level Observ While Drilling: After Drilling:	Date	e/Time e/Time				h (ft bgs) h (ft bgs)
_	MPLE	toug		110	.,,,,,		ioriiga.i	7 ittor Brilling.	Duit	, TIIII0			Ворс	(1. 595)
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET				LITHOLOG DESCRIPTI	IC ON			nscs	GRAPHIC LOG	C	COMMENTS
			-	Water [Depth to se	ediment fr	om water sui	face approximat	ely 5	feet.			Water 576.9 f	surface elevation is feet.
1 CS			2- 	ASH M	ostly coal	ash, blacl	k (10YR 2/1),	, wet, loose.				3	572.4	
1 CS	75		8- 8- 10- 10- - 12- - 14-											
			16 -		SILT Mo: DYR 5/1), v			ne sand, trace to	few	clay,	ML		Native 564.4 f	Material Elevation is feet.
			18 -	End of I	boring 17.	2 feet beld	ow the water	surface.						
Signa	ature:	1.1.					Firm: TRC	1540 Eisenhower	Place	e	'	7	34-97	1-7080 Phone
		por	P					Ann Arbor, MI 48						1-9022 Fax

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

		4		20	i	SOIL E	BORII	NG LOG						
3	Ī			RC					В	ORING N	O. S	B-20		
	ty/Proje						D	ate Drilling Starte	ed:	Date Drilling	Comple	ted:	Page 1	t Number:
	DT	E Ele	ctric (Company B	ottom As	h Basin Closure		9/21/202	20	9/21/	2020		3675	565.0002.0000
Drillin	g Firm:				Drilling Me	thod:	S	urface Elev. (ft)	TOC	Elevation (ft)	Total	Depth ((ft bgs)	Borehole Dia. (in)
			Servi			Direct Push						15.8		3
Borin	g Locat	ion: Sa	ame lo	cation as SB-2	20-20.			ersonnel Logged By - Jake	e Krenz		Drillin	g Equip	ment:	
							ı	Driller - Dave Mo	kma			Н	land Ir	nstalled
Civil	Town/C	ity/or Vi	llage:	County:		State:		/ater Level Obse While Drilling:		e/Time			Deptl	h (ft bgs)
	River	Roug	е	Wa	yne	Michigan		After Drilling:		e/Time				h (ft bgs)
SAM	MPLE													
	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			LITHOL						90		OMMENTS
ᄯᇄ	ËRY	000	Z			DESCRI	PTION	_				GRAPHIC LOG		OWNERTO
NUMBER AND TYPE	000	MC	P H								nscs	AP.		
₽¥	쀮	B	DE								Sn	GR.		
			-	Water D	epth to n	ative material from	water	surface is 13	3.68 fe	et.			Water s 576.4 fe	surface elevation is eet.
			-	_										
			2-											
			-											
			-											
			-											
			4-											
			-											
			-											
			6-											
			-											
			-											
			8-	_										
			-											
			-											
			10-											
			-											
			_											
			12-											
			-	_										
			_											
		1	14-	CLAY n	nostly cla	y, low to medium pl	lasticit	y, gray (10YF	R 5/1),		CL	///	Native 562.7 fe	Material Elevation is
1 NDIST	100		-	saturate		e to medium sand, ç	arov (1	10VD 5/1) or	oturoto		SP	///	302.7 10	eet.
dash		-	-	loose.	nosuy iin	e to medium sand, (gray (1	10 1 17 3/1), Sa	alurale	:u, 	JI-		:	
			16-		oring at	18 inches below the	e botto	m of the bas	in.					
			-											
			40											
			18-											
			-											

Signature: Just Juny

Firm: TRC 1540 Eisenhower Place Ann Arbor, MI 48108 734-971-7080 Phone 734-971-9022 Fax

		100					SOIL BOI	RING LOG							
5	1			20						ВО	RING		. SB -	20-21 of 1	
	ity/Proje							Date Drilling Started:	:	Date Drilling	Comple			t Number:	
	DTI	E Ele	ctric (Company E	Bottom Ash	Basin Cl	osure	2/18/2020		2/18/	2020		3	58707.000 ²	1
Drillin	ng Firm:				Drilling Metho	od:		Surface Elev. (ft)	TOC	Elevation (ft)	Total	Depth (ft bgs)	Borehole Dia.	(in)
	Job	Site	Servi	ces		Vibra Co	re					16.5		4	
Borin	g Locati				est of weir bri	dge, 15 fee	t from south	Personnel	_		Drillin	g Equip	ment:		
		sh	ore of	basin.				Logged By - Jake k Driller - Dave Mokn					Vibra	Core	
	Town/Ci			County:		State:		Water Level Observa		/Time			Dept	n (ft bgs)	
	River I	Roug	e	Wa	ayne	Mic	chigan	After Drilling:	Date	/Time			Dept	h (ft bgs)	
NUMBER AND TYPE	(%)	BLOW COUNTS	DEPTH IN FEET				LITHOLOG DESCRIPTIO				nscs	GRAPHIC LOG	C	OMMENTS	3
			2- - - - -	Water I feet.	Depth to sed	diment fro	om water sur	face is approxim	ately	5			Water : 576.9 f	surface elevation eet.	is
SOIL BORING WELL CONSTRUCTION LOG DTE EC RRPP BAB CLOSURE CONFIRMATORY BORINGS(1),GPJ 358707,0001 2/1/21	100		6— 6— 10— 12— 14—	ASH Mo	ostly coal a	sh, black	(10YR 2/1),	wet, loose.					571.7 f	eet.	
S WELL CONSTRUCTION LOG DTE EC RRPPE			16— 	SANDY gray (10	SILT Most DYR 5/1), w	tly silt, littl et, loose.	le to some fi	/ (10YR 5/1), wet ne sand, trace to surface.			SP ML		Native 566.5 f	Material Elevatior eet.	ı is
ORINC		Λ.	0	,											
Signa	ature:	Spol	L	mg/				1540 Eisenhower Ann Arbor, MI 481							one Fax

				RC			SOIL BOI	RING LOG	_						
				7						ORING N			Page 1 d	of 1	
Facili	ty/Projed) - 44 A	- l- D: OI		Date Drilling Started		Date Drilling			Project N		2 0000
Drillin	g Firm:	= Ele	ctric (company B	Drilling Me	sh Basin Cl	osure	9/21/2020 Surface Elev. (ft)		9/21/ Elevation (ft)	/2020			5.0002 Sorehole [
		Site	Servi	ces	Brining ivi	Direct Pu	sh				lotai	16.5		3	
Borin				cation as SB-	20-21.	Direct u	011	Personnel			Drillin	g Equip			<u> </u>
0: "	- 10:					la:		Logged By - Jake I Driller - Dave Mokr	ma			Н	and Ins	talled	
	Γown/Ci River I			County:	iyne	State:	chigan	Water Level Observ While Drilling: After Drilling:	Date	e/Time e/Time			Depth (Depth (
	/IPLE	J			<u>, </u>			, ,						. 0 /	
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			I	LITHOLOG DESCRIPTIO	IC ON			nscs	GRAPHIC LOG	co	MMEN	ĭTS
Ì			-	Water D	epth to r	native mate	rial from wat	er surface is 15.	30 fe	et.			Water sur 576.4 feet		tion is
1 NDIST	101		2	√loose.				y (10YR 5/1), sat om of the basin.	turate	d,	SP		Native Ma 561.1 feet	aterial Elev	ration is
Signa	ture:	1.0.	0				Firm: TRC	1540 Eisenhower	Place	•	•	7:	34-971-7	7080	Phone
	/	proc	p					Ann Arbor, MI 48					34-971-		Fax

		1		3			SOIL BO	RING LOG							
5	7			2C						BOI	RING			-20-22	
	ty/Proje							Date Drilling Started:		Date Drilling	Comple		Page 1	t Number:	
r doil				Company B	ottom Ac	h Basin Cl	ocuro	2/18/2020			/2020			58707.000	0 1
Drillin	ا ط g Firm:		CITIC C	Joinparty D	Drilling Met		usui c	Surface Elev. (ft)		Elevation (ft)		Depth (Borehole Dia	
D.1		Sito	Servi	000	Drilling Woo	Vibra Co	ro	Curiado Liov. (it)	1001		lotai	16.5	it bgo)	4	u. (III)
Borin				f basin, 30 fe	et west of w			Personnel			Drillin	g Equip	ment [.]	4	
		no	orth sho	ore of basin.	or west of w	eli bilage, it	y leet from	Logged By - Jake k Driller - Dave Mokn			Diami.			Core	
	Fown/Ci	-	_	County:	V ID O	State:	obigon	Water Level Observa	Date	/Time				h (ft bgs)	
	River	Roug	e	Wa	yrie	IVII	chigan	After Drilling:	Date	/Time			Dept	h (ft bgs)	
SAIN	/IPLE														
NUMBER AND TYPE	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			I	LITHOLOG DESCRIPTI	IC ON			nscs	GRAPHIC LOG	C	OMMENT	ΓS
			-	Water D feet.	epth to se	ediment fro	om water sui	face is approxim	ately	5			Water : 576.9 f	surface elevatio eet.	on is
1 CCS	90		2—	SAND M	Mostly fine	e sand, tra		, wet, loose.	y, gra	у	SP		571.3 Native 563.3 f	Material Elevati eet.	ion is
Signa	ature:	Joal	Z					1540 Eisenhower Ann Arbor, MI 48 ⁷)				1-7080 PI 1-9022	hone Fax

				36	i	SOIL BO	RING LOG						
5	1			RC				В	ORING N	O. S			
	ty/Proje						Date Drilling Started	d:	Date Drilling	Comple		Page 1	of 1 t Number:
				Company B	ottom Asl	n Basin Closure	9/21/2020			2020			565.0002.0000
Drillin	ng Firm:				Drilling Met		Surface Elev. (ft)		Elevation (ft)			ft bgs)	
	Job	Site	Servi	ces		Direct Push					17.5		3
Borin	g Locati	ion: Sa	ame lo	cation as SB-	20-22.		Personnel	Vran-		Drillin	g Equip	ment:	
							Logged By - Jake Driller - Dave Moki				Н	and In	stalled
Civil	Town/Ci	ty/or Vi	llage:	County:		State:	Water Level Observ		e/Time			Dont	h (ft bgs)
	River	Roug	е	Wa	yne	Michigan	After Drilling:		e/Time				h (ft bgs)
SAN	MPLE												
	(%)	STZ	H			LITHOLOG	IC				ဗ္ဂ		OMMENTS
ᄱᇜ	RECOVERY (%)	BLOW COUNTS	DEPTH IN FEET			DESCRIPTI	ON				GRAPHIC LOG		OMMENTS
NUMBER AND TYPE	000	N N	H.							တ္သ	APH		
ΣĀ	H H	BL(DE							nscs	G. A.		
			_	Water D	epth to na	ative material from wa	ter surface is 15.	.88 fe	et.			Water s 576.4 fe	surface elevation is eet.
			-	_									
			2-										
				1									
			-	-									
			4-										
			-	_									
			-	_									
			6-										
			-	-									
			-	_									
			8-										
			-										
			-	_									
			10-										
			-										
			-	_									
			12-										
			-	-									
			-										
			14										
			-										
			-]									
	+		16-	CLAY n	nostly clay	y, trace fine sand, low	plasticity, very d	ark or	av	CL	///		Material Elevation is
NDIST	100		-	├\(10YR 4	/1), satur	ated, very soft.				SP	222	560.5 fe	eet.
			-			e sand, trace to few cla o medium dense.	ay, gray (10YR 5	/1),	/	LOL	1		
			18-	CLAY n	nostly clay	y, low to medium plast	icity, gray (10 YF	R 5/1).	,				
			-	∖moist, s	oft to med	lium stiff.		,					
			-	_ ⊨nd of b	oring at 1	2 inches below the bo	ttom of the basir	n.					
			20 —	_									

Signature: Firm: TRC 1540 Eisenhower Place Ann Arbor, MI 48108