

## **Annual Groundwater Monitoring Report**

DTE Electric Company Sibley Quarry Coal Combustion Residual Landfill

> 801 Fort Street Trenton, Michigan

January 2018



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Prepared For DTE Electric Company

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TRC | DTE Electric Company

Final

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# **Executive Summary**

On April 17, 2015, the United States Environmental Protection Agency (USEPA) published the final rule for the regulation and management of Coal Combustion Residuals (CCR) under the Resource Conservation and Recovery Act (RCRA) (the CCR Rule). The CCR Rule, which became effective on October 19, 2015, applies to the DTE Electric Company (DTE Electric) Sibley Quarry Landfill (SQLF) CCR unit. Pursuant to the CCR Rule, no later than January 31, 2018, and annually thereafter, the owner or operator of a CCR unit must prepare an annual groundwater monitoring and corrective action report for the CCR unit documenting the status of groundwater monitoring and corrective action for the preceding year in accordance with §257.90(e).

TRC Engineers Michigan, Inc., the engineering entity of TRC Environmental Corporation (TRC), prepared this Annual Groundwater Monitoring Report (Annual Report) for the SQLF CCR unit on behalf of DTE Electric. This Annual Report was prepared in accordance with the requirements of §257.90(e) and presents the monitoring results and the statistical evaluation of the detection monitoring parameters (Appendix III to Part 257 of the CCR Rule) for the September 2017 semiannual groundwater monitoring event for the SQLF CCR unit. This event is the initial detection monitoring event performed to comply with §257.94. As part of the statistical evaluation, the data collected during detection monitoring events are evaluated to identify statistically significant increases (SSIs) in detection monitoring parameters to determine if concentrations in detection monitoring well samples exceed background levels.

Potential SSIs over background limits were noted for boron, chloride, sulfate and TDS in one or more compliance wells for the September 2017 monitoring event. This is the initial detection monitoring event; therefore, it is the initial identification of any potential SSIs over background levels. Based on the hydrogeology at the Site, with the SQLF continuously being dewatered since before CCR disposal began, maintaining a continuous inward hydraulic gradient, it is not possible for the uppermost aquifer to have been affected by CCR disposal operations. Due to limitations on CCR Rule implementation timelines, the background data sets are of relatively short duration for capturing the occurrence of natural temporal changes in the aquifer.

According to §257.94(e), if the facility determines, pursuant to §257.93(h), that there is a SSI over background levels for one or more of the Appendix III constituents, the facility will, within 90 days of detecting a SSI, establish an assessment monitoring program **<or>

 or
 demonstrate that:** 

- A source other than the CCR unit caused the SSI, or
- The SSI resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality.

In response to the potential SSIs over background limits noted during the September 2017 monitoring event, DTE Electric plans to collect a resample for each of the potential SSIs and prepare an Alternative Source Demonstration (ASD) to evaluate the SSIs. The SSI is likely the result of temporal variability that was not captured in the background data set, given the short duration of time that the background data set was collected, but this will be further evaluated during the ASD process.

## 1.1 Program Summary

On April 17, 2015, the United States Environmental Protection Agency (USEPA) published the final rule for the regulation and management of Coal Combustion Residuals (CCR) under the Resource Conservation and Recovery Act (RCRA) (the CCR Rule). The CCR Rule, which became effective on October 19, 2015, applies to the DTE Electric Company (DTE Electric) Sibley Quarry Landfill Coal Combustion Residual Landfill (SQLF) CCR unit. Pursuant to the CCR Rule, no later than January 31, 2018, and annually thereafter, the owner or operator of a CCR unit must prepare an annual groundwater monitoring and corrective action report for the CCR unit documenting the status of groundwater monitoring and corrective action for the preceding year in accordance with §257.90(e).

TRC Engineers Michigan, Inc., the engineering entity of TRC Environmental Corporation (TRC), prepared this Annual Groundwater Monitoring Report (Annual Report) for the SQLF CCR unit on behalf of DTE Electric. This Annual Report was prepared in accordance with the requirements of §257.90(e) and presents the monitoring results and the statistical evaluation of the detection monitoring parameters (Appendix III to Part 257 of the CCR Rule) for the September 2017 semiannual groundwater monitoring event for the SQLF CCR unit. This event is the initial detection monitoring event performed to comply with §257.94. The monitoring was performed in accordance with the CCR Groundwater Monitoring and Quality Assurance Project Plan – DTE Electric Company Sibley Quarry Coal Combustion Residual Landfill (QAPP) (TRC, August 2016; revised March 2017) and statistically evaluated per the Groundwater Statistical Evaluation Plan – DTE Electric Company Sibley Quarry Coal Combustion Residual Landfill (Stats Plan) (TRC, October 2017). As part of the statistical evaluation, the data collected during detection monitoring events are evaluated to identify statistically significant increases (SSIs) of detection monitoring parameters compared to background levels.

### 1.2 Site Overview

The SQLF is located in Section 7, Township 4 South, Range 11 East, at 801 Fort Street (a.k.a. 502 Quarry Road) in Trenton, Wayne County, Michigan (Figure 1). The SQLF is located about two miles north of the DTE Electric Trenton Power Plant. The SQLF is bounded mostly by Fort Street to the west, Sibley Road to the north, the former Detroit and Toledo Shore Line Railroad and West Jefferson to the east, and the former Vulcan Mold & Iron Company (now owned by Danou Enterprises) and the DTE Electric Jefferson Substation to the south.

The SQLF is a licensed Type III solid waste disposal facility owned and operated by DTE Electric. The disposal facility currently receives the majority of CCR from the Trenton Channel and River Rouge Power Plants. In addition, a small amount of CCR is also received from the Monroe Power Plant. The SQLF is operated under the current operating license number 9394 in accordance with Michigan Part 115 of the Natural Resources and Environmental Protection Act (NREPA), PA 451 of 1994, as amended.

### 1.3 Geology/Hydrogeology

The SQLF CCR unit is located approximately one-half mile west of the Detroit River. The Sibley quarry was originally developed to mine limestone beginning in the mid-1800s and was mined to over 300 feet below ground surface (ft bgs) in some areas before becoming inactive. In 1951, Detroit Edison (now DTE Electric) acquired Sibley Quarry and began to manage CCR in the SQLF. As part of normal operations, beginning in 1951, the SQLF has been continuously dewatered to approximately 300 ft bgs maintaining a water level in the bottom of the quarry by pumping an average of approximately 1.5 million gallons per day.

The SQLF resides in an area characterized by near surface deposits of glacio-lacustrine clay and silt units on top of thick strata of dolomite and limestone bedrock. The SQLF is located in an area where the Dundee Formation (mostly limestone) and the Detroit River Group (limestone, dolostone and some sandstone) underlie the unconsolidated glacial drift and are the uppermost aquifer. At SQLF, the Dundee Formation is overlain by anywhere from less than 15 feet to more than 70 feet of unconsolidated material, most of which is clay-rich soil with some fill. The top of the Dundee Formation limestone/dolostone bedrock was encountered at depths ranging from 16.5 to 74.5 ft bgs and, including the underlying Detroit River Group limestone/dolostone/ sandstone, extended to depths ranging from 235 to over 310 ft bgs. The underlying Sylvania Sandstone was encountered at depths ranging from 235 to 300 ft bgs in some locations at the SQLF.

As expected, data show that groundwater levels are significantly lower within the bedrock in monitoring wells that are the closest to the quarry where significant pumping is, with water levels ranging from 120 to more than 210 ft bgs. Groundwater flow is consistently inward toward the base of the quarry due to continuous pumping at the quarry that hydraulically controls groundwater flow. The pumped water from the quarry is managed in accordance with a National Pollution Discharge Elimination System (NPDES) permit. Quarry dewatering results in all the perimeter uppermost aquifer CCR monitoring wells being upgradient of the SQLF CCR unit.

Because the uppermost aquifer is in an area where pumping has been performed continuously before CCR disposal began, and will be continued to be dewatered, a continuous inward hydraulic gradient is maintained. As a result, the uppermost aquifer perimeter monitoring

wells cannot have been affected by the SQLF CCR unit operations to date, nor could they be in the future under current pumping conditions. Given that groundwater flow is inward toward the quarry, all of the perimeter monitoring wells in the groundwater monitoring system are located in an up gradient position relative to the landfill; therefore, monitoring of the SQLF CCR unit using interwell statistical methods (upgradient to downgradient) is not possible. Instead, based on these hydrogeologic conditions, intrawell statistical approaches are the appropriate method to evaluate groundwater data statistically. Consequently, intrawell statistical tests are being used during detection monitoring as outlined in the Stats Plan.

# Section 2 Groundwater Monitoring

### 2.1 Monitoring Well Network

A groundwater monitoring system has been established for the SQLF CCR unit as detailed in the *Groundwater Monitoring System Summary Report – DTE Electric Company Sibley Quarry Coal Combustion Residual Landfill* (GWMS Report) (TRC, October 2017). The detection monitoring well network for the SQLF CCR unit currently consists of eight monitoring wells that are screened in the uppermost aquifer. The monitoring well locations are shown on Figure 2.

As discussed above and in the Stats Plan, intrawell statistical methods for the SQLF were selected because the uppermost aquifer is in an area where pumping has been performed continuously since before CCR disposal began, and will be continued to be dewatered, resulting in a maintained continuous inward hydraulic gradient. Given that groundwater flow is inward under pumping conditions toward the quarry, all of the perimeter monitoring wells in the groundwater monitoring system are located in an up gradient position relative to the landfill. Therefore, monitoring of the SQLF CCR unit using interwell statistical methods (upgradient to downgradient) is not possible. This also supports that the aquifer is unaffected by the CCR unit, where, as a result of the continuously maintained inward gradient, groundwater within the uppermost aquifer cannot have been affected by the SQLF CCR unit operations to date, nor could they be in the future under current pumping conditions.

An intrawell statistical approach requires that each of the monitoring wells doubles as the background and compliance well, where data from each individual well during a detection monitoring event is compared to a statistical limit developed using the background dataset from that same well. Monitoring wells MW-101 through MW-107 and MW-108A are located around the perimeter of the SQLF and provide data on both background and perimeter groundwater quality that has not been affected by the CCR unit (total of eight background/compliance monitoring wells).

## 2.2 Background Sampling

Background groundwater monitoring was conducted at the SQLF CCR unit from August 2016 through August 2017 in accordance with the QAPP. Data collection included eight background data collection events of static water elevation measurements, analysis for parameters required in the CCR Rule's Appendix III and Appendix IV to Part 257, and field parameters (dissolved oxygen, oxidation reduction potential, pH, specific conductivity, temperature, and turbidity) from all eight monitoring wells installed for the SQLF CCR unit, in addition to one supplemental

background sampling event for select parameters from a subset of monitoring wells. The additional data were collected in August 2017 in order to extend the background data set and confirm analytical results from MW-102 (chloride, fluoride and sulfate), MW-106 (Appendix III and IV CCR parameters, without radium), and MW-107 (fluoride). The groundwater samples were analyzed by TestAmerica Laboratories, Inc. (TestAmerica).

Background data are included in Appendix A Tables 1 through 3, where: Table 1 is a summary of static water elevation data; Table 2 is a summary of groundwater analytical data compared to potentially relevant criteria; and Table 3 is a summary of field data. In addition to the data tables, groundwater potentiometric elevation data are summarized for each background monitoring event in Appendix A Figures 1 through 8.

### 2.3 Semiannual Groundwater Monitoring

The semiannual monitoring parameters for the detection groundwater monitoring program were selected per the CCR Rule's Appendix III to Part 257 – Constituents for Detection Monitoring. The Appendix III indicator parameters consist of boron, calcium, chloride, fluoride, pH (field reading), sulfate, and total dissolved solids (TDS) and were analyzed in accordance with the sampling and analysis plan included within the QAPP. In addition to pH, the collected field parameters included dissolved oxygen, oxidation reduction potential, specific conductivity, temperature, and turbidity.

### 2.3.1 Data Summary

The initial semiannual groundwater detection monitoring event for 2017 was performed during September 20 and 21, 2017, by TRC personnel and samples were analyzed by TestAmerica in accordance with the QAPP. Static water elevation data were collected at all eight monitoring well locations. Groundwater samples were collected from the eight detection monitoring wells for the Appendix III indicator parameters and field parameters. A summary of the groundwater data collected during the September 2017 event is provided on Table 1 (static groundwater elevation data), Table 2 (analytical results), and Table 3 (field data).

### 2.3.2 Data Quality Review

Data from each round were evaluated for completeness, overall quality and usability, method-specified sample holding times, precision and accuracy, and potential sample contamination. The data were found to be complete and usable for the purposes of the CCR monitoring program. Particular data non-conformances are summarized in Appendix B.

### 2.3.3 Groundwater Flow Rate and Direction

Groundwater elevation data collected during the most recent background sampling events showed that groundwater within the uppermost aquifer flows radially into the quarry as a result of continuous pumping/dewatering at the Site. Groundwater potentiometric surface elevations measured across the Site during the September 2017 sampling event are provided on Table 1 and were used to construct a groundwater potentiometric surface map (Figure 3).

The map indicates that current groundwater flow is consistent with previous monitoring events. The average hydraulic gradient throughout the Site during this event is estimated at 0.085 ft/ft. Resulting in an estimated average seepage velocity of approximately 5.8 ft/day or 2,100 ft/year for this event, using the average hydraulic conductivity of 6.8 ft/day (TRC, 2017) and an assumed effective porosity of 0.1.

Given that groundwater flow is maintained inward toward the quarry, all of the perimeter monitoring wells in the groundwater monitoring system are located in an up gradient position relative to the landfill. Therefore, there is no potential for groundwater to migrate away from the SQLF CCR unit.

### 3.1 Establishing Background Limits

Per the Stats Plan, background limits were established for the Appendix III indicator parameters following the collection of at least eight background monitoring events using data collected from each of the eight established detection monitoring wells (MW-101 through MW-107 and MW-108A). The statistical evaluation of the background data is presented in detail in Appendix C. The Appendix III background limits for each monitoring well will be used throughout the detection monitoring period to determine whether groundwater has been impacted from the SQLF CCR unit by comparing concentrations in the detection monitoring wells to their respective background limits for each Appendix III indicator parameter.

### 3.2 Data Comparison to Background Limits

The concentrations of the indicator parameters in each of the detection monitoring wells (MW-101 through MW-107 and MW-108A) were compared to their respective statistical background limits calculated from the background data collected from each individual well (i.e., monitoring data from MW-101 is compared to the background limit developed using the background dataset from MW-101, and so forth). The comparisons are presented on Table 4.

The statistical evaluation of the September 2017 Appendix III indicator parameters shows potential SSIs over background for:

- Boron at MW-106;
- Chloride at MW-106 and MW-108A;
- Sulfate at MW-105; and
- TDS at MW-108A.

There were no SSIs compared to background for calcium, fluoride or pH.

# Section 4 Conclusions and Recommendations

Potential SSIs over background limits were noted for boron, chloride, sulfate and TDS in one or more compliance wells during the September 2017 monitoring event. This is the initial detection monitoring event; therefore, it is the initial identification of any potential SSIs over background levels. As discussed above, and in the GWMS Report, because the uppermost aquifer is in an area where pumping has been performed continuously since before CCR disposal began and will be continued to be dewatered, a continuous inward hydraulic gradient is maintained. As a result, the uppermost aquifer perimeter monitoring wells cannot have been affected by the SQLF CCR unit operations to date, nor could they be in the future under current pumping conditions. Due to limitations on CCR Rule implementation timelines, the background data sets are of relatively short duration for capturing the occurrence of natural temporal changes in the aquifer being drawn inward toward the SQLF.

According to §257.94(e), in the event that the facility determines, pursuant to §257.93(h), that there is a SSI over background levels for one or more of the Appendix III constituents, the facility will, within 90 days of detecting a SSI, establish an assessment monitoring program **<or>
demonstrate** that:

- A source other than the CCR unit caused the SSI, or
- The SSI resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality.

The owner or operator must complete a written demonstration (i.e., Alternative Source Demonstration, ASD), of the above within 90 days of confirming the SSI. Based on the outcome of the ASD the following steps will be taken:

- If a successful ASD is completed, a certification from a qualified professional engineer is required, and the CCR unit may continue with detection monitoring.
- If a successful ASD is not completed within the 90-day period, the owner or operator of the CCR unit must initiate an assessment monitoring program as required under §257.95. The facility must also include the ASD in the annual groundwater monitoring and corrective action report required by §257.90(e), in addition to the certification by a qualified professional engineer.

In response to the potential SSIs over background limits noted for the September 2017 monitoring event, DTE Electric plans to collect a resample for each of the potential SSIs and prepare an ASD

within 90-days to evaluate the SSIs. The SSIs are likely the result of temporal variability that was not captured in the background data set, given the short duration of time that the background data set was collected, but this will be further evaluated during the ASD process.

No corrective actions were performed in 2017. The next semiannual monitoring event at the SQLF is scheduled for the second calendar quarter of 2018.

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# Section 5 Groundwater Monitoring Report Certification

The U.S. EPA's Disposal of Coal Combustion Residuals from Electric Utilities Final Rule Title 40 CFR Part 257 §257.90(e) requires that the owner or operator of an existing CCR unit prepare an annual groundwater monitoring and corrective action report.

### Annual Groundwater Monitoring Report Certification Sibley Quarry Coal Combustion Residual Landfill Trenton, Michigan

### CERTIFICATION

I hereby certify that the annual groundwater and corrective action report presented within this document for the SQLF CCR unit has been prepared to meet the requirements of Title 40 CFR §257.90(e) of the Federal CCR Rule. This document is accurate and has been prepared in accordance with good engineering practices, including the consideration of applicable industry standards, and with the requirements of Title 40 CFR §257.90(e).

Name:  David B. McKenzie, P.E.	Expiration Date: October 31, 2019	of Mich of Mic
Company:  TRC Engineers Michigan, Inc.	Date:	of essional Stamp

# Section 6 References

- TRC Environmental Corporation. August 2016; Revised March 2017. CCR Groundwater Monitoring and Quality Assurance Project Plan DTE Electric Company Sibley Quarry Coal Combustion Residual Landfill, 801 Fort Street, Trenton, Michigan. Prepared for DTE Electric Company.
- TRC Environmental Corporation. October 2017. Groundwater Monitoring System Summary Report Sibley Quarry Coal Combustion Residual Landfill, 801 Fort Street, Trenton, Michigan. Prepared for DTE Electric Company.
- TRC Environmental Corporation. October 2017. Groundwater Statistical Evaluation Plan DTE Electric Company Sibley Quarry Coal Combustion Residual Landfill, 801 Fort Street, Trenton, Michigan. Prepared for DTE Electric Company.

# **Tables**

Table 1
Summary of Groundwater Elevation Data – September 2017
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Well ID	MW	/-101	MW-	-102	MW	-103	MW	-104	MW	'-105	MW	-106	MW	-107	MW-	108A
Date Installed	7/14	/2015	7/16/	2015	7/15/	2015	7/16/	/2015	3/30/	/2016	3/28/	/2016	4/6/2	2016	1/24/	2017
TOC Elevation	61	7.67	615	5.03	607	7.23	608	3.39	593	3.28	606	6.75	610	0.03	594	.06
Geologic Unit of Screened Interval	Limestone Bedrock		Limestone	e Bedrock	Limestone	e Bedrock	Limeston	e Bedrock Sandstone Be		e Bedrock						
Bottom of Open Hole Elevation	7957		342.6		294.7		29	6.0	29	0.7	30	4.0	33	6.5	290	0.5
Unit	ft BTOC	ft	ft BTOC	ft												
Measurement Date	Depth to Water	GW Elevation	Depth to Water	GW Elevation												
9/20/2017	178.34	439.33	210.28	404.75	179.26	427.97	120.82	487.57	23.22	570.06	186.47	420.28	156.85	453.18	55.13	538.93

Elevations are reported in feet realative to the national geodetic vertical datum of 1929.

ft BTOC - feet below top of casing

NM - Not Measured

Table 2
Summary of Groundwater Analytical Data – September 2017
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

	Sample Location:	MW-101	MW-102	MW-103	MW-104	MW-105	MW-106	MW-107	MW-108A
	Sample Date:	9/20/2017	9/20/2017	9/20/2017	9/20/2017	9/21/2017	9/20/2017	9/20/2017	9/21/2017
Constituent	Unit								
Appendix III									
Boron	ug/L	280	130	760	760	2,500	1,000	1,500	1,400
Calcium	ug/L	230,000	260,000	560,000	470,000	700,000	560,000	1,300,000	420,000
Chloride	mg/L	120	170	150	250	4,300	140	20,000	2,100
Fluoride	mg/L	2.0	1.8	1.9	1.9	< 2.5	1.9	<2.4	< 1.3
pH, Field	SU	7.0	6.8	6.8	6.9	6.9	6.8	6.7	6.8
Sulfate	mg/L	670	700	1,900	1,900	2,200	1,900	3,400	1,100
Total Dissolved Solids	s mg/L	1,400	1,500	3,200	3,000	8,400	3,100	27,000	5,000

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units; pH is a field parameter.

NC - no criteria.

All metals were analyzed as total unless otherwise specified.

Table 3
Summary of Field Data – September 2017
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Sample Location	Sample Date	Dissolved Oxygen (mg/L)	Oxidation Reduction Potential (mV)	pH (SU)	Specific Conductivity (umhos/cm)	Temperature (deg C)	Turbidity (NTU)
MW-101	9/20/2017	0.14	-178.2	7.0	1,824	13.07	20.2
MW-102	9/20/2017	0.42	-108.7	6.8	2,097	15.04	0.26
MW-103	9/20/2017	0.18	-335.4	6.8	3,577	13.05	0.82
MW-104	9/20/2017	0.12	-285.4	6.9	3,426	13.76	0.84
MW-105	9/21/2017	0.18	-137.7	6.9	13,805	14.02	0.48
MW-106	9/20/2017	0.49	-319.2	6.8	3,414	15.83	3.60
MW-107	9/20/2017	0.51	-298.2	6.7	50,326	16.81	1.56
MW-108A	9/21/2017	0.36	28.1	6.8	7,572	13.85	4.87

mg/L - milligrams per liter.

mV - milliVolt.

SU - standard unit.

umhos/cm - micro-mhos per centimeter.

deg C - degrees celcius.

NTU - nephelometric turbidity units.

Table 4

# Comparison of Appendix III Parameter Results to Background Limits – September 2017 Sibley Quarry Landfill – RCRA CCR Monitoring Program Trenton, Michigan

	Sample Location:	MW	-101	MW	-102	MW	'-103	MW	-104	MW	<b>'-105</b>	MW	-106	MW	-107	MW-	-108A
	Sample Date:	9/20/	/2017	9/20/	2017	9/20	/2017	9/20/	/2017	9/21	/2017	9/20/	2017	9/20/	2017	9/21	/2017
Constituent	Unit	Data	PL	Data	PL	Data	PL	Data	PL								
Appendix III																	
Boron	ug/L	280	280	130	200	760	810	760	970	2,500	2,600	1,000	810	1,500	1,500	1,400	1,400
Calcium	ug/L	230,000	270,000	260,000	310,000	560,000	630,000	470,000	530,000	700,000	830,000	560,000	650,000	1,300,000	1,500,000	420,000	470,000
Chloride	mg/L	120	200	170	270	150	160	250	800	4,300	4,800	140	130	20,000	21,000	2,100	1,900
Fluoride	mg/L	2.0	2.1	1.8	1.9	1.9	2.1	1.9	2.8	< 2.5	5.8	1.9	3.0	<2.4	2.5	< 1.3	2.5
pH, Field	SU	7.0	6.8 - 7.8	6.8	6.5 - 7.6	6.8	6.7 - 7.6	6.9	6.8 - 7.9	6.9	6.6 - 7.9	6.8	6.5 - 7.6	6.7	6.5 - 7.6	6.8	6.7 - 6.9
Sulfate	mg/L	670	740	700	770	1,900	2,100	1,900	1,900	2,200	2,000	1,900	2,100	3,400	3,800	1,100	1,100
Total Dissolved Solids	s mg/L	1,400	1,400	1,500	1,800	3,200	3,700	3,000	4,100	8,400	9,700	3,100	3,200	27,000	41,000	5,000	4,900

### Notes:

ug/L - micrograms per liter.

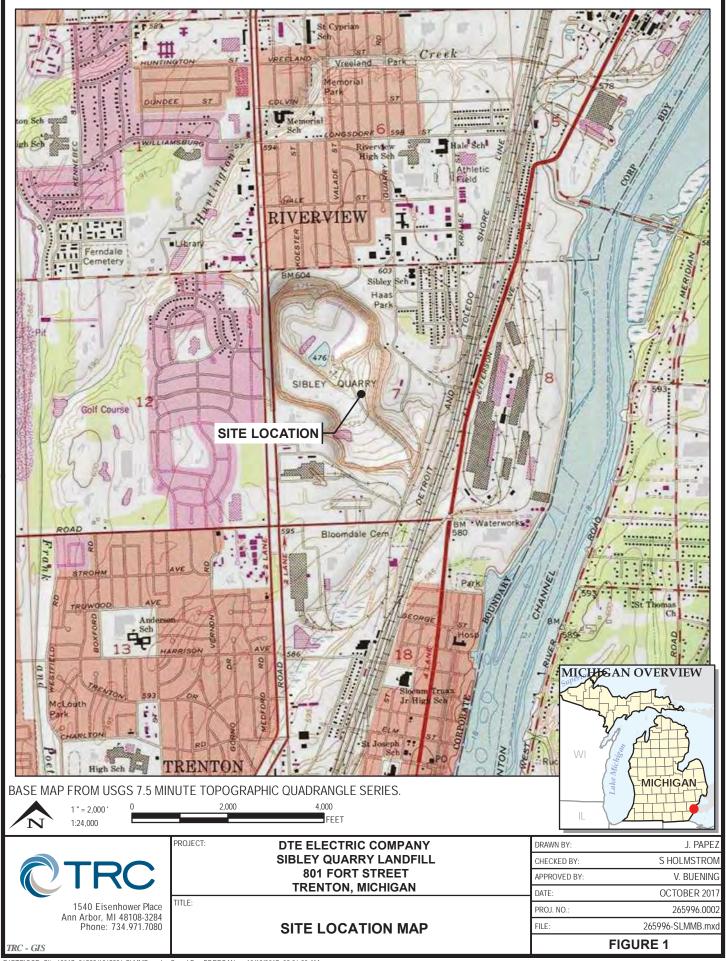
mg/L - milligrams per liter.

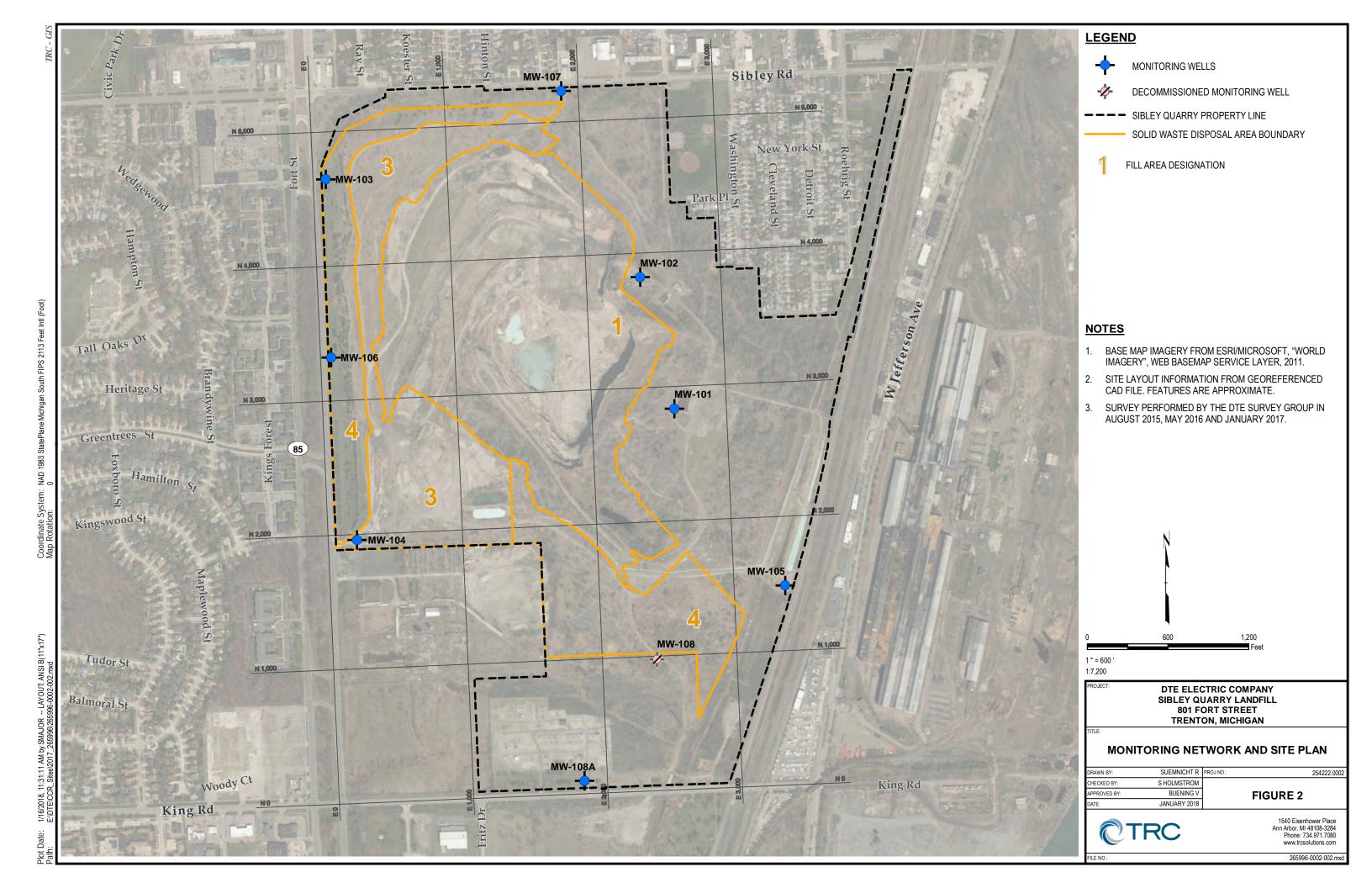
SU - standard units; pH is a field Parameter.

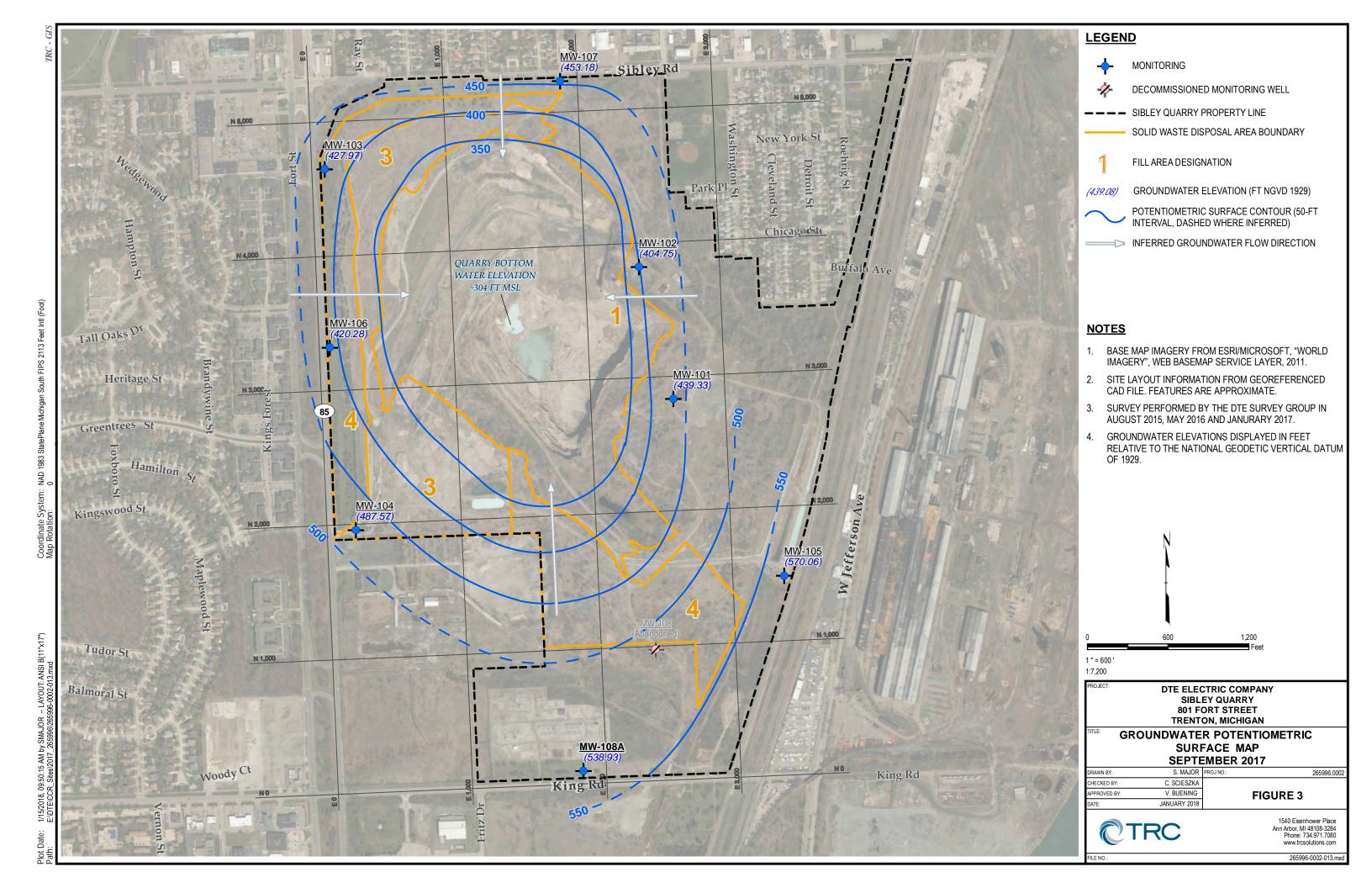
All metals were analyzed as total unless otherwise specified.

RESULT Shading and bold font indicates an exceedance of the Prediction Limit (PL).

# **Figures**







# Appendix A Background Data

# Table 1 Groundwater Elevation Summary Sibley Quarry Landfill – RCRA CCR Monitoring Program Trenton, Michigan

Well ID	MW	/-101	MW	<i>'</i> -102	MW	<b>'-103</b>	MW	/-104	MW	-105	MW	/-106	MW	'-107	MW-	108 <sup>(1)</sup>	MW-	108A
Date Installed	7/14	/2015	7/16	/2015	7/15	/2015	7/16	/2015	3/30	2016	3/28	/2016	4/6/2	2016	3/29	/2016	1/24	/2017
TOC Elevation	61	7.67	61	5.03	607	7.23	608	8.39	593	3.28	60	6.75	610	0.03	602	2.96	594	1.06
Geologic Unit of Screened Interval	Limeston	e Bedrock	Sandston	e Bedrock														
Bottom of Open Hole Elevation	29	95.2	34	2.6	29	4.7	29	06.0	29	0.7	30	)4.0	33	6.5	30	0.2	29	0.5
Unit	ft BTOC	ft	ft BTOC	ft														
Measurement Date	Depth to Water	GW Elevation	Depth to Water	GW Elevation														
8/10/2016	178.59	439.08	210.10	404.93	178.00	429.23	117.20	491.19	22.36	570.92	115.45	491.30	156.81	453.22	83.50	519.46		
9/28/2016	178.25	439.42	211.08	403.95	180.40	426.83	73.92	534.47	22.50	570.78	190.50	416.25	156.70	453.33	83.40	519.56	Not in	stalled
11/16/2016	178.30	439.37	210.38	404.65	180.10	427.13	120.15	488.24	22.00	571.28	190.78	415.97	156.80	453.23	83.35	519.61	NOT III	stalled
1/18/2017	178.34	439.33	206.64	408.39	178.68	428.55	119.80	488.59	21.08	572.20	190.46	416.29	156.96	453.07	81.40	521.56	1	
2/1/2017	NM	NM			55.10	538.96												
3/8/2017	178.21	439.46	208.53	406.50	177.49	429.74	120.54	487.85	21.35	571.93	190.01	416.74	156.56	453.47			55.18	538.88
4/4/2017	NM	NM			55.10	538.96												
4/24/2017	178.10	439.57	208.71	406.32	180.18	427.05	120.85	487.54	20.58	572.70	189.60	417.15	156.86	453.17	Decomp	nissioned	55.11	538.95
5/16/2017	NM	NM	Decomin	iissioi ieu	55.12	538.94												
6/14/2017	178.33	439.34	209.57	405.46	175.08	432.15	120.80	487.59	22.55	570.73	188.88	417.87	156.80	453.23			55.13	538.93
7/6/2017	NM	NM			55.10	538.96												
7/19/2017	178.40	439.27	209.98	405.05	179.85	427.38	120.91	487.48	22.63	570.65	188.32	418.43	157.00	453.03			55.13	538.93

#### Notes:

Elevations are reported in feet realative to the national geodetic vertical datum of 1929.

ft BTOC - feet below top of casing

NM - Not Measured

1) MW-108 was decomissioned on 1/25/2017.

Table 2
Summary of Analytical Results for Groundwater Samples
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Sar	mple Location:				MW	<i>I</i> -101			
	Sample Date:	8/10/2016	9/29/2016	11/16/2016	1/19/2017	3/9/2017	4/24/2017	6/15/2017	7/20/2017
Constituent	Unit								
Appendix III									
Boron	ug/L	230	200	240	220	240	260	250	270
Calcium	ug/L	270,000	220,000	220,000	220,000	210,000	230,000	210,000	230,000
Chloride	mg/L	95	97	160	31	150	170	140	130
Fluoride	mg/L	1.6	1.8	1.8	0.34	1.6	1.9	1.9	1.9
рН	SU	7.0	7.1	7.2	7.0	7.0	7.0	7.2	7.1
Sulfate	mg/L	680	680	560	110	580	480	540	590
Total Dissolved Solids	mg/L	1,400	1,300	1,200	1,300	1,300	1,300	1,300	1,300
Appendix IV									
Antimony	ug/L	2.1	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Arsenic	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Barium	ug/L	17	22	32	32	26	33	28	21
Beryllium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Cadmium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Chromium	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Cobalt	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Fluoride	mg/L	1.6	1.8	1.8	0.34	1.6	1.9	1.9	1.9
Lead	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Lithium	ug/L	18	18	20	21	20	20	18	21
Mercury	ug/L	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
Molybdenum	ug/L	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10
Radium-226	pCi/L	1.87	1.43	1.21	1.21	1.57	1.40	1.35	1.25
Radium-226/228	pCi/L	1.89	1.12	1.56	1.31	1.82	1.78	1.46	1.69
Radium-228	pCi/L	< 0.450	< 0.622	< 0.356	< 0.404	< 0.347	< 0.383	< 0.332	0.445
Selenium	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Thallium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units.

pCi/L - picocuries per liter.

NA - not analyzed

All metals were analyzed as total, unless

Table 2
Summary of Analytical Results for Groundwater Samples
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Sar	nple Location:					MW	<b>/</b> -102				
	Sample Date:	8/11/2016	9/29/2016	9/29/2016	11/16/2016	1/19/2017	3/9/2017	4/24/2017	6/15/2017	7/19/2017	8/24/2017
Constituent	Unit			Field Dup							
Appendix III											
Boron	ug/L	94	83	87	130	140	130	150	150	130	NA
Calcium	ug/L	300,000	270,000	280,000	280,000	230,000	230,000	260,000	270,000	270,000	NA
Chloride	mg/L	160	120	130	160	230	220	260	190	170	150
Fluoride	mg/L	1.5	1.6	1.6	1.5	1.1	1.2	1.5	1.7	1.8	1.5
рН	SU	6.9	7.0	6.9	7.0	6.9	7.2	7.0	6.9	6.9	NA
Sulfate	mg/L	680	610	670	660	410	520	450	610	650	620
Total Dissolved Solids	mg/L	1,700	1,500	1,500	1,500	1,300	1,600	1,500	1,600	1,600	NA
Appendix IV											
Antimony	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	NA
Arsenic	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	NA
Barium	ug/L	8.5	6.6	6.5	8.2	30	17	46	18	10	NA
Beryllium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	NA
Cadmium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	NA
Chromium	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	NA
Cobalt	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	NA
Fluoride	mg/L	1.5	1.6	1.6	1.5	1.1	1.2	1.5	1.7	1.8	1.5
Lead	ug/L	< 1.0	4.7	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	NA
Lithium	ug/L	20	19	24	21	18	19	21	22	25	NA
Mercury	ug/L	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	NA
Molybdenum	ug/L	< 10	< 10	< 10	< 10	< 10	< 10	20	11	< 10	NA
Radium-226	pCi/L	2.14	2.43	2.43	2.50	1.49	1.91	1.44	2.23	1.83	NA
Radium-226/228	pCi/L	2.48	2.50	2.69	2.67	1.84	1.88	1.64	2.27	2.28	NA
Radium-228	pCi/L	< 0.429	< 0.406	< 0.463	< 0.368	< 0.684	< 0.323	< 0.405	< 0.303	0.443	NA
Selenium	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	NA
Thallium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	NA

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units.

pCi/L - picocuries per liter.

NA - not analyzed

All metals were analyzed as total, unless

Table 2
Summary of Analytical Results for Groundwater Samples
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Sai	mple Location:				MW	<i>I</i> -103			
	Sample Date:	8/11/2016	9/28/2016	11/17/2016	1/18/2017	3/8/2017	4/24/2017	6/14/2017	7/19/2017
Constituent	Unit								
Appendix III									
Boron	ug/L	640	610	740	690	700	700	780	740
Calcium	ug/L	600,000	600,000	590,000	590,000	570,000	580,000	630,000	590,000
Chloride	mg/L	150	130	150	150	140	140	140	150
Fluoride	mg/L	1.6	1.7	1.5	1.6	1.5	1.9	1.9	2.0
рН	SU	6.9	7.0	7.1	7.1	7.0	7.1	7.0	7.1
Sulfate	mg/L	1,900	2,100	2,000	2,000	2,000	1,800	1,900	2,000
Total Dissolved Solids	mg/L	3,400	3,200	3,200	3,200	3,600	2,900	3,000	3,300
Appendix IV									
Antimony	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Arsenic	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Barium	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Beryllium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Cadmium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Chromium	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Cobalt	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Fluoride	mg/L	1.6	1.7	1.5	1.6	1.5	1.9	1.9	2.0
Lead	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Lithium	ug/L	54	50	56	53	54	58	55	58
Mercury	ug/L	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
Molybdenum	ug/L	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10
Radium-226	pCi/L	16.1	14.8	12.5	13.4	12.2	10.7	12.3	12.5
Radium-226/228	pCi/L	16.2	14.7	13.3	13.3	12.1	10.6	12.4	12.8
Radium-228	pCi/L	< 0.484	< 0.381	0.861	< 0.651	< 0.353	< 0.365	< 0.314	< 0.420
Selenium	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Thallium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units.

pCi/L - picocuries per liter.

NA - not analyzed

All metals were analyzed as total, unless

Table 2
Summary of Analytical Results for Groundwater Samples
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Sar	mple Location:					MW-104				
	Sample Date:	8/11/2016	9/29/2016	11/17/2016	1/18/2017	3/8/2017	4/24/2017	6/14/2017	7/19/2017	7/19/2017
Constituent	Unit									Field Dup
Appendix III										
Boron	ug/L	680	650	950	900	710	700	740	730	740
Calcium	ug/L	500,000	450,000	520,000	500,000	480,000	500,000	500,000	490,000	480,000
Chloride	mg/L	330	300	600	690	250	220	220	240	240
Fluoride	mg/L	2.7	1.5	1.2	1.3	1.3	1.8	1.8	1.8	1.8
рН	SU	7.1	7.2	7.3	7.2	7.2	7.1	7.1	7.3	7.3
Sulfate	mg/L	1,700	1,800	1,800	1,800	1,800	1,700	1,700	1,800	1,800
Total Dissolved Solids	mg/L	3,300	2,700	3,800	3,800	3,300	2,700	2,900	3,000	3,000
Appendix IV	i i									
Antimony	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Arsenic	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Barium	ug/L	7.2	7.7	9.5	9.6	7.2	7.4	7.3	7.0	6.9
Beryllium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Cadmium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Chromium	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Cobalt	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Fluoride	mg/L	2.7	1.5	1.2	1.3	1.3	1.8	1.8	1.8	1.8
Lead	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Lithium	ug/L	55	53	77	78	54	57	51	57	58
Mercury	ug/L	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
Molybdenum	ug/L	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10
Radium-226	pCi/L	0.836	0.787	0.491	0.682	0.620	0.556	0.607	0.486	0.502
Radium-226/228	pCi/L	0.814	0.935	0.739	0.671	0.473	0.560	< 0.399	0.726	0.600
Radium-228	pCi/L	< 0.428	< 0.396	< 0.391	< 0.511	< 0.368	< 0.351	< 0.399	< 0.344	< 0.395
Selenium	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Thallium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units.

pCi/L - picocuries per liter.

NA - not analyzed

All metals were analyzed as total, unless

Table 2
Summary of Analytical Results for Groundwater Samples
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Sa	mple Location:							MW-105						
	Sample Date:	8/10/2016	9/28/2016	11/16/2016	11/16/2016	1/19/2017	1/19/2017	3/8/2017	3/8/2017	4/24/2017	4/24/2017	6/14/2017	6/14/2017	7/20/2017
Constituent	Unit				Field Dup		Field Dup		Field Dup		Field Dup		Field Dup	
Appendix III														
Boron	ug/L	2,500	2,200	2,400	2,300	2,000	2,000	2,000	1,900	1,900	1,900	2,200	2,300	2,400
Calcium	ug/L	800,000	740,000	700,000	670,000	680,000	640,000	680,000	650,000	620,000	660,000	770,000	730,000	730,000
Chloride	mg/L	4,300	4,500	4,000	4,000	3,700	3,700	3,700	3,400	2,800	2,900	3,500	3,600	3,900
Fluoride	mg/L	5.8	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5
рН	SU	7.0	7.1	7.0	7.1	7.0	7.1	7.0	7.0	7.0	6.9	6.8	6.9	7.0
Sulfate	mg/L	2,000	1,900	1,900	2,000	1,800	1,800	1,800	1,700	1,500	1,600	1,900	1,900	2,000
Total Dissolved Solids	mg/L	9,100	9,500	7,900	8,200	8,200	8,000	8,500	8,600	7,600	7,600	8,300	8,400	8,400
Appendix IV														
Antimony	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Arsenic	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Barium	ug/L	40	43	41	40	40	39	36	36	35	34	38	38	39
Beryllium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Cadmium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Chromium	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Cobalt	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	1.2	1.1	1.1	1.1	< 1.0
Fluoride	mg/L	5.8	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5
Lead	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Lithium	ug/L	370	230	240	250	240	250	220	220	220	220	240	240	290
Mercury	ug/L	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
Molybdenum	ug/L	40	40	30	31	26	27	23	24	24	25	28	28	31
Radium-226	pCi/L	2.14	2.30	1.40	1.64	0.971	0.771	0.948	1.10	0.878	0.829	1.45	1.11	1.54
Radium-226/228	pCi/L	2.76	3.05	1.97	2.09	1.50	1.82	1.10	1.55	1.24	1.02	1.75	1.48	2.47
Radium-228	pCi/L	0.615	0.746	0.564	< 0.527	< 0.607	1.05	< 0.364	0.459	< 0.401	< 0.371	< 0.310	< 0.409	0.927
Selenium	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Thallium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units.

pCi/L - picocuries per liter.

NA - not analyzed

All metals were analyzed as total, unless otherwise specified.

Table 2
Summary of Analytical Results for Groundwater Samples
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Sample Location: Sample Date:		MW-106										
		8/11/2016	9/28/2016	11/17/2016	1/18/2017	3/9/2017	4/24/2017	6/14/2017	7/19/2017	8/24/2017		
Constituent	Unit											
Appendix III												
Boron	ug/L	580	610	750	670	650	670	710	790	680		
Calcium	ug/L	560,000	570,000	620,000	600,000	580,000	600,000	620,000	570,000	510,000		
Chloride	mg/L	120	100	120	110	110	110	110	120	110		
Fluoride	mg/L	3.0	1.7	1.6	1.5	1.4	1.8	1.8	1.9	1.8		
рН	SU	6.9	7.1	7.1	7.3	7.0	7.3	7.1	7.3	7.0		
Sulfate	mg/L	1,900	2,000	2,000	2,100	2,000	1,800	1,900	1,900	2,000		
Total Dissolved Solids	mg/L	3,100	3,100	3,200	3,200	3,100	6,100	3,100	3,000	2,800		
Appendix IV												
Antimony	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0		
Arsenic	ug/L	< 5.0	78	68	350	32	330	480	2,000	42		
Barium	ug/L	< 5.0	6.1	< 5.0	< 5.0	< 5.0	< 5.0	5.0	13	< 5.0		
Beryllium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0		
Cadmium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0		
Chromium	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0		
Cobalt	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0		
Fluoride	mg/L	3.0	1.7	1.6	1.5	1.4	1.8	1.8	1.9	1.8		
Lead	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0		
Lithium	ug/L	47	51	47	51	48	52	49	61	41		
Mercury	ug/L	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20		
Molybdenum	ug/L	< 10	38	25	19	< 10	11	22	120	< 10		
Radium-226	pCi/L	17.8	18.7	15.0	13.9	13.1	12.4	13.4	11.9	NA		
Radium-226/228	pCi/L	17.8	18.7	15.4	14.3	13.3	12.8	13.3	12.6	NA		
Radium-228	pCi/L	< 0.387	< 0.422	< 0.411	< 0.509	< 0.376	0.356	< 0.388	0.638	NA		
Selenium	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0		
Thallium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0		

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units.

pCi/L - picocuries per liter.

NA - not analyzed

All metals were analyzed as total, unless

Table 2
Summary of Analytical Results for Groundwater Samples
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Sample Location: Sample Date:		MW-107											
		8/10/2016	8/10/2016	9/29/2016	11/16/2016	1/18/2017	3/9/2017	4/26/2017	6/15/2017	7/19/2017	8/24/2017		
Constituent	Unit		Field Dup										
Appendix III													
Boron	ug/L	1,200	1,200	1,100	1,300	1,300	1,200	1,300	1,400	1,400	NA		
Calcium	ug/L	1,300,000	1,300,000	1,200,000	1,300,000	1,200,000	1,300,000	1,400,000	1,400,000	1,400,000	NA		
Chloride	mg/L	19,000	19,000	18,000	18,000	18,000	16,000	19,000	17,000	20,000	NA		
Fluoride	mg/L	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	2.1	<2.4	<2.4	2.3		
рН	SU	7.0	7.1	7.1	7.1	7.3	6.9	7.0	6.9	7.0	NA		
Sulfate	mg/L	3,100	3,000	3,100	3,200	3,300	2,900	3,200	3,800	3,400	NA		
Total Dissolved Solids	mg/L	21,000	25,000	19,000	19,000	27,000	31,000	34,000	31,000	36,000	NA		
Appendix IV													
Antimony	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 10	< 2.0	< 2.0	< 2.0	NA		
Arsenic	ug/L	< 5.0	5.7	< 5.0	< 5.0	< 5.0	< 25	5.6	6.4	5.7	NA		
Barium	ug/L	10	10	9.1	9.1	9.5	< 25	8.6	9.8	7.9	NA		
Beryllium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 5.0	< 1.0	< 1.0	< 1.0	NA		
Cadmium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 5.0	< 1.0	< 1.0	< 1.0	NA		
Chromium	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 10	< 2.0	< 2.0	< 2.0	NA		
Cobalt	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 5.0	< 1.0	< 1.0	< 1.0	NA		
Fluoride	mg/L	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	2.1	<2.4	<2.4	2.3		
Lead	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 5.0	< 1.0	< 1.0	< 1.0	NA		
Lithium	ug/L	200	140	120	180	210	180	210	190	230	NA		
Mercury	ug/L	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	NA		
Molybdenum	ug/L	< 10	< 10	< 10	< 10	< 10	< 50	16	< 10	< 10	NA		
Radium-226	pCi/L	54.7	52.7	51.8	46.8	41.6	49.9	40.9	42.3	35.8	NA		
Radium-226/228	pCi/L	55.3	53.3	52.5	47.8	42.8	50.0	41.4	42.7	36.4	NA		
Radium-228	pCi/L	0.591	0.639	0.721	0.995	1.15	< 0.431	0.538	0.363	< 0.804	NA		
Selenium	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 25	8.0	< 5.0	< 5.0	NA		
Thallium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 5.0	< 1.0	< 1.0	< 1.0	NA		

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units.

pCi/L - picocuries per liter.

NA - not analyzed

All metals were analyzed as total, unless

Table 2
Summary of Analytical Results for Groundwater Samples
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Sample Location:		MW-108A											
	Sample Date:	2/1/2017	2/1/2017	3/8/2017	4/4/2017	4/4/2017	4/24/2017	5/16/2017	5/16/2017	6/15/2017	7/6/2017	7/6/2017	7/20/2017
Constituent	Unit		Field Dup			Field Dup			Field Dup			Field Dup	
Appendix III													
Boron	ug/L	1,100	1,100	1,100	1,200	1,200	1,200	1,300	1,400	1,300	1,300	1,300	1,300
Calcium	ug/L	370,000	360,000	380,000	380,000	370,000	390,000	390,000	410,000	440,000	440,000	430,000	440,000
Chloride	mg/L	1,700	1,700	1,700	1,800	1,800	1,600	1,800	1,800	1,800	1,800	1,800	1,900
Fluoride	mg/L	< 1.0	< 1.0	1.2	1.3	1.3	< 1.3	1.1	1.1	< 2.5	< 1.3	< 1.3	1.1
рН	SU	7.0	7.0	7.0	7.0	7.0	7.0	7.1	7.0	6.9	7.0	6.9	7.0
Sulfate	mg/L	940	940	930	1,000	990	900	1,000	1,000	1,000	1,000	1,000	1,000
Total Dissolved Solids	mg/L	4,200	4,300	4,200	4,600	4,400	4,100	4,500	4,400	4,700	4,600	4,500	4,500
Appendix IV													
Antimony	ug/L	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Arsenic	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Barium	ug/L	45	43	47	52	52	44	41	43	48	48	46	47
Beryllium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Cadmium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Chromium	ug/L	< 2.0	< 2.0	2.9	2.6	2.5	7.1	3.3	3.1	31	7.6	8.8	2.7
Cobalt	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Fluoride	mg/L	< 1.0	< 1.0	1.2	1.3	1.3	< 1.3	1.1	1.1	< 2.5	< 1.3	< 1.3	1.1
Lead	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Lithium	ug/L	120	120	120	120	130	140	110	120	130	140	140	150
Mercury	ug/L	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
Molybdenum	ug/L	19	19	17	18	18	20	20	20	21	18	17	16
Radium-226	pCi/L	0.757	0.639	0.892	0.700	0.803	0.874	0.714	0.496	0.723	0.937	1.11	0.775
Radium-226/228	pCi/L	1.02	1.34	1.78	1.36	1.48	1.38	1.28	1.03	1.38	1.20	1.68	1.93
Radium-228	pCi/L	< 0.507	0.704	0.891	0.663	0.674	0.509	0.563	0.538	0.660	< 0.668	< 0.622	1.16
Selenium	ug/L	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Thallium	ug/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0

ug/L - micrograms per liter.

mg/L - milligrams per liter.

SU - standard units.

pCi/L - picocuries per liter.

NA - not analyzed

All metals were analyzed as total, unless

Table 3
Summary of Field Parameters
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Sample Location	Sample Date	Dissolved Oxygen (mg/L)	Oxidation Reduction Potential (mV)	pH (SU)	Specific Conductivity (umhos/cm)	Temperature (deg C)	Turbidity (NTU)
	8/10/2016	0.78	-133.1	7.00	1,306	13.59	9.75
	9/29/2016	0.67	-307.0	7.79	1,950	11.82	32.7
	11/16/2016	1.51	21.2	6.91	1,404	12.62	22.3
MW-101	1/19/2017	2.62	52.5	6.79	765	9.26	1.58
10100-101	3/9/2017	1.08	-91.3	6.92	1,799	11.28	17.8
	4/24/2017	0.23	-146.4	6.91	1,798	12.63	10.06
	6/15/2017	0.24	-223.4	6.91	1,626	13.80	0.12
	7/20/2017	0.16	-201.2	6.94	1,737	13.03	10.2
	8/11/2016	7.00	63.3	6.49	1,652	13.21	0.23
	9/29/2016	0.76	-251.0	7.56	2,300	12.95	24.0
	11/16/2016	2.09	16.8	6.79	1,688	13.18	9.09
	1/19/2017	3.97	65.6	6.74	862	9.34	2.86
MW-102	3/9/2017	3.36	-80.6	6.94	2,116	10.86	1.55
	4/24/2017	4.59	23.9	6.91	2,148	13.08	4.20
	6/15/2017	0.91	-96.3	6.75	1,970	17.03	0.82
	7/19/2017	0.56	-206.6	6.86	2,066	15.29	0.10
	8/24/2017	0.34	-219.6	6.85	2,138	12.76	0.03
	8/11/2016	1.23	-208.8	6.67	2,714	14.04	0.07
	9/28/2016	0.98	-374.0	7.58	3,640	12.27	21.4
	11/17/2016	2.63	-254.0	6.75	2,638	12.05	2.58
1.004 4.00	1/18/2017	1.44	-249.6	6.70	2,576	10.22	2.10
MW-103	3/8/2017	0.32	-321.6	6.77	2,461	12.25	0.69
	4/24/2017	0.37	-339.7	6.77	3,344	11.56	0.41
	6/14/2017	0.37	-341.4	6.70	3,423	16.73	0.64
	7/19/2017	0.24	-337.2	6.73	3,378	16.46	0.31
	8/11/2016	1.70	-196.3	6.82	2,855	14.03	4.52
	9/29/2016	0.65	-327.0	7.88	4,090	13.78	23.5
	11/17/2016	2.15	-257.3	6.97	3,469	13.09	18.3
NNA/ 404	1/18/2017	0.86	-239.2	6.80	3,492	11.17	1.50
MW-104	3/8/2017	0.20	-302.0	6.94	2,670	12.10	1.57
	4/24/2017	0.19	-325.8	6.93	3,234	12.98	0.42
	6/14/2017	0.28	-315.4	6.85	3,317	17.80	2.84
	7/19/2017	0.18	-321.0	6.92	3,279	16.68	0.49
	8/10/2016	1.80	28.4	6.59	10,940	15.09	1.00
	9/28/2016	0.73	-263.0	7.90	14,660	13.35	20.0
	11/16/2016	0.75	0.3	6.87	1,085	13.58	8.69
NAVA 107	1/19/2017	0.72	-117.9	6.78	5,656	11.58	0.82
MW-105	3/8/2017	0.57	1.4	6.83	9,374	12.13	0.01
	4/24/2017	0.22	-214.2	6.80	10,695	12.75	0.07
	6/14/2017	0.23	-203.3	6.82	12,420	15.12	0.13
	7/20/2017	0.70	-165.1	6.93	13,035	15.29	0.25

#### Notes:

mg/L - milligrams per liter.

mV - milliVolt.

SU - standard unit.

umhos/cm - micro-mhos per centimeter.

deg C - degrees celcius.

NTU - nephelometric turbidity units.

Table 3
Summary of Field Parameters
Sibley Quarry Landfill – RCRA CCR Monitoring Program
Trenton, Michigan

Sample Location	Sample Date	Dissolved Oxygen (mg/L)	Oxidation Reduction Potential (mV)	pH (SU)	Specific Conductivity (umhos/cm)	Temperature (deg C)	Turbidity (NTU)
	8/11/2016	1.50	-229.9	6.67	2,596	13.77	2.19
	9/28/2016	0.77	-359.0	7.59	3,500	13.43	42.9
	11/17/2016	4.61	-228.4	6.48	2,598	13.15	5.15
	1/18/2017	1.88	-255.7	6.73	2,456	10.03	0.92
MW-106	3/9/2017	0.35	-322.1	6.84	3,236	12.32	0.41
	4/24/2017	0.73	-333.4	6.80	3,194	13.31	0.77
	6/14/2017	0.61	-331.3	6.75	3,278	17.71	0.74
	7/19/2017	0.45	-316.1	6.81	3,224	17.29	4.33
	8/24/2017	0.33	-337.6	6.82	3,398	14.54	3.28
	8/10/2016	1.22	-268.9	6.53	36,450	18.50	0.26
	9/29/2016	0.68	-317.0	7.59	4,970	14.67	27.1
	11/16/2016	1.56	-244.6	6.66	3,588	11.94	0.00
	1/18/2017	2.83	-291.3	6.66	34,270	9.92	3.15
MW-107	3/9/2017	0.97	-295.3	6.73	41,193	7.21	2.18
	4/26/2017	0.36	-309.6	6.67	48,733	14.44	0.51
	6/15/2017	0.40	-304.5	6.60	45,983	15.70	0.78
	7/19/2017	0.75	-311.4	6.67	49,155	16.51	0.64
	8/24/2017	0.32	-332.1	6.65	51,549	14.36	0.39
	2/1/2017	4.98	110.4	6.70	4,789	11.01	6.37
MW-108A	3/8/2017	0.39	40.8	6.83	6,991	11.37	3.42
	4/4/2017	0.23	37.9	6.86	6,560	11.23	11.66
	4/24/2017	0.53	24.4	6.86	6,593	12.79	1.96
	5/16/2017	0.51	34.3	6.84	6,451	11.89	2.36
	6/15/2017	0.34	24.0	6.80	6,518	13.12	3.84
	7/6/2017	0.72	87.6	6.83	7,165	14.08	4.58
	7/20/2017	0.59	49.2	6.87	7,038	13.89	4.77

#### Notes:

mg/L - milligrams per liter.

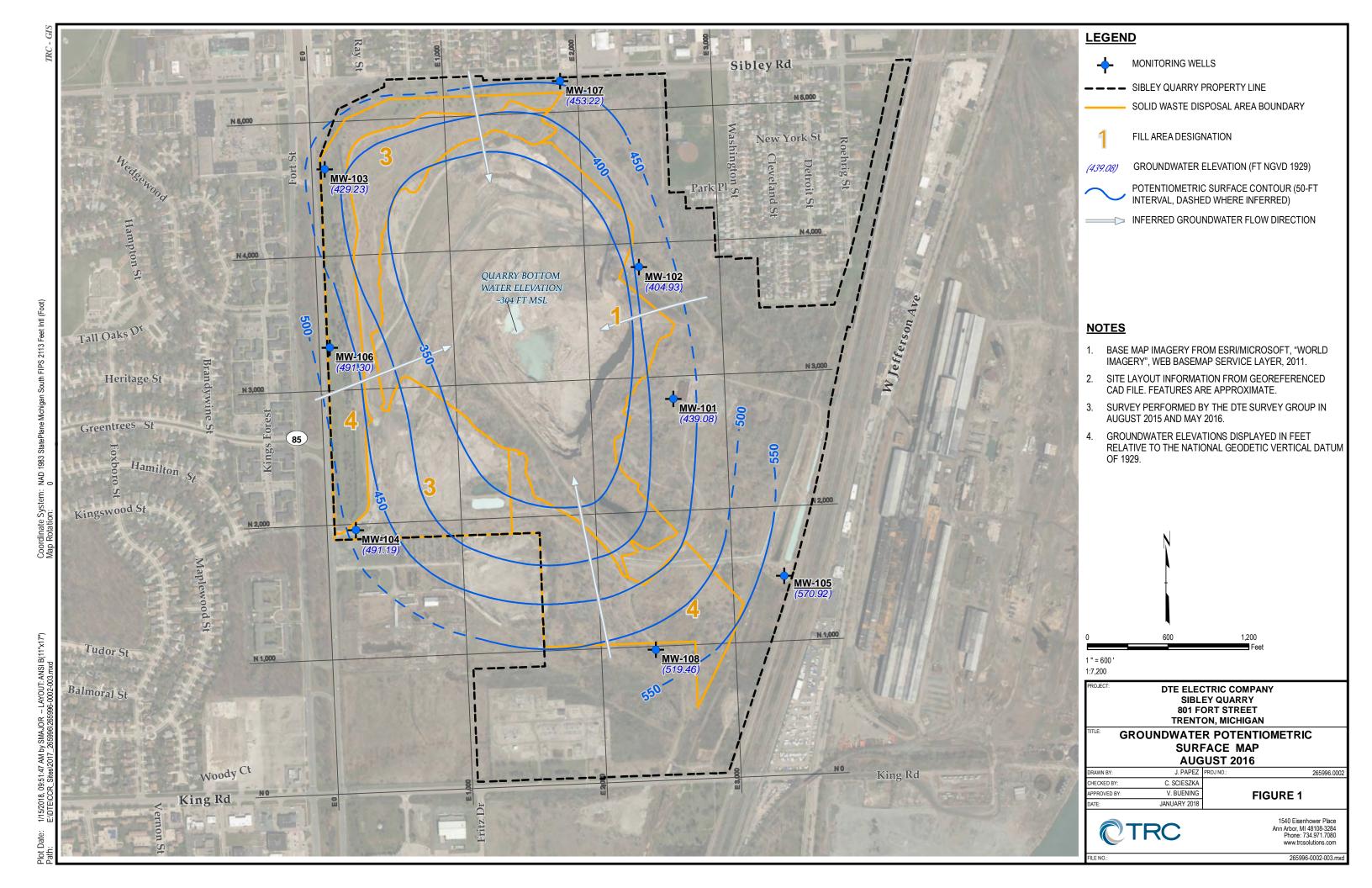
mV - milliVolt.

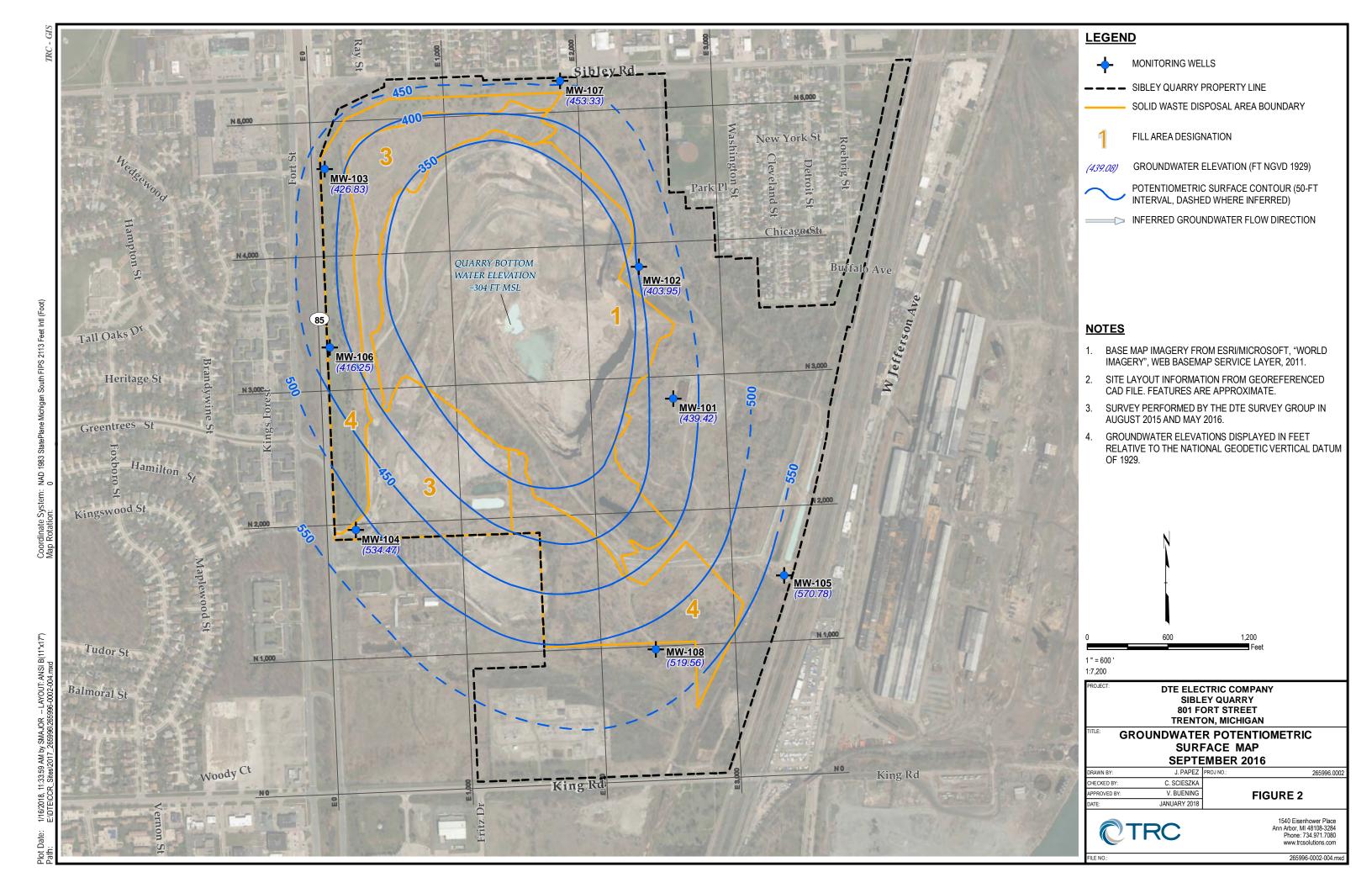
SU - standard unit.

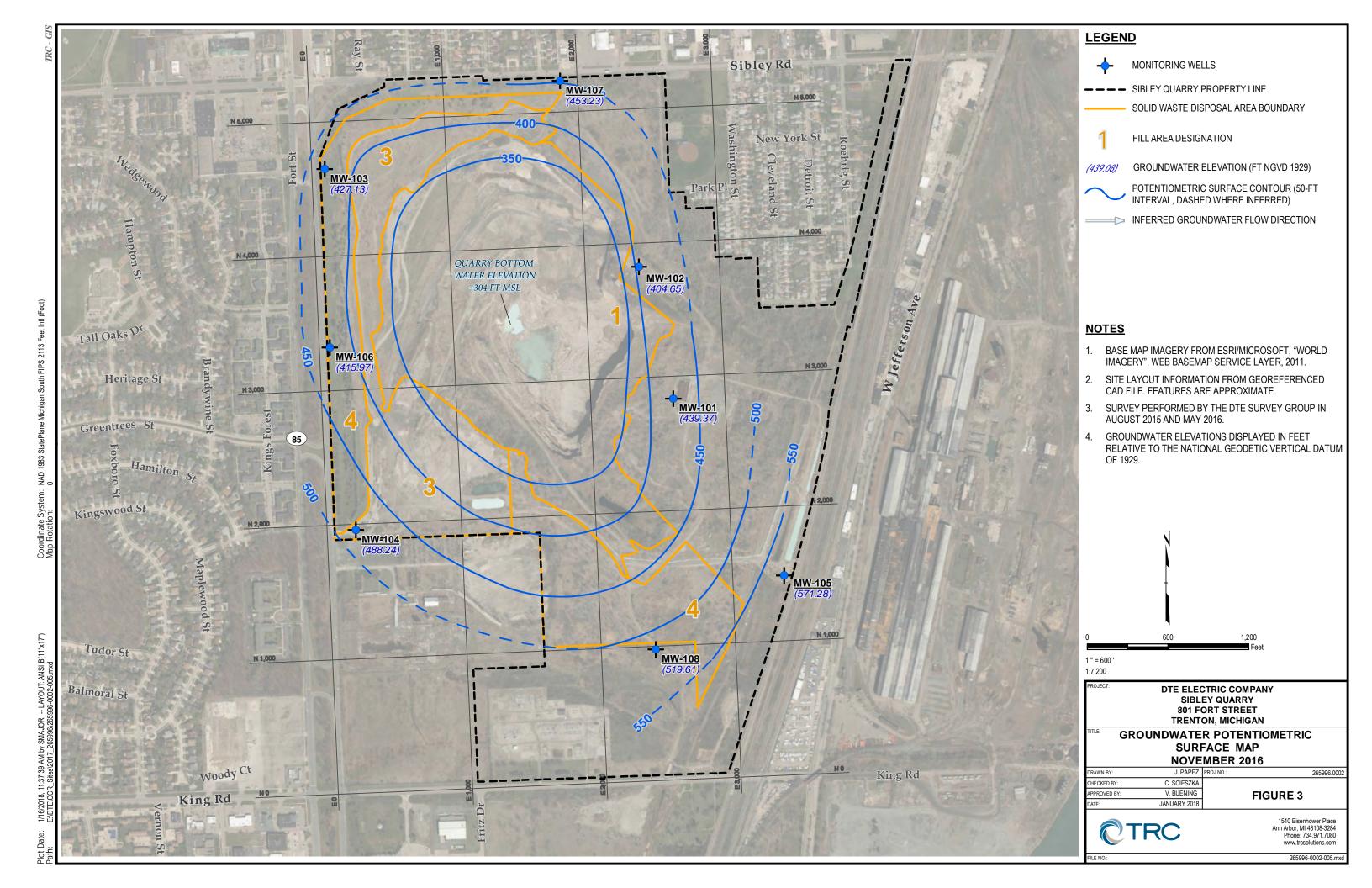
umhos/cm - micro-mhos per centimeter.

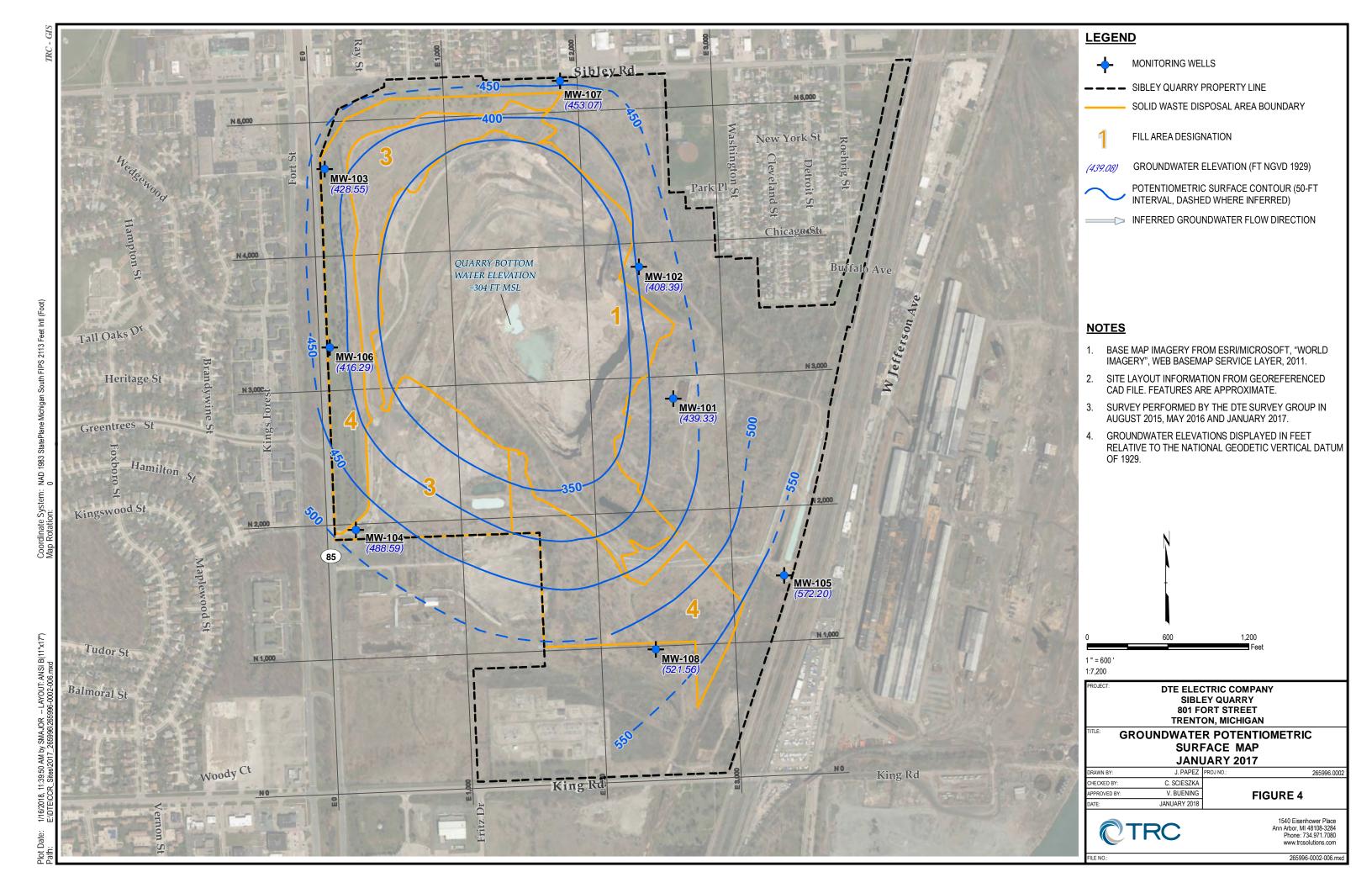
deg C - degrees celcius.

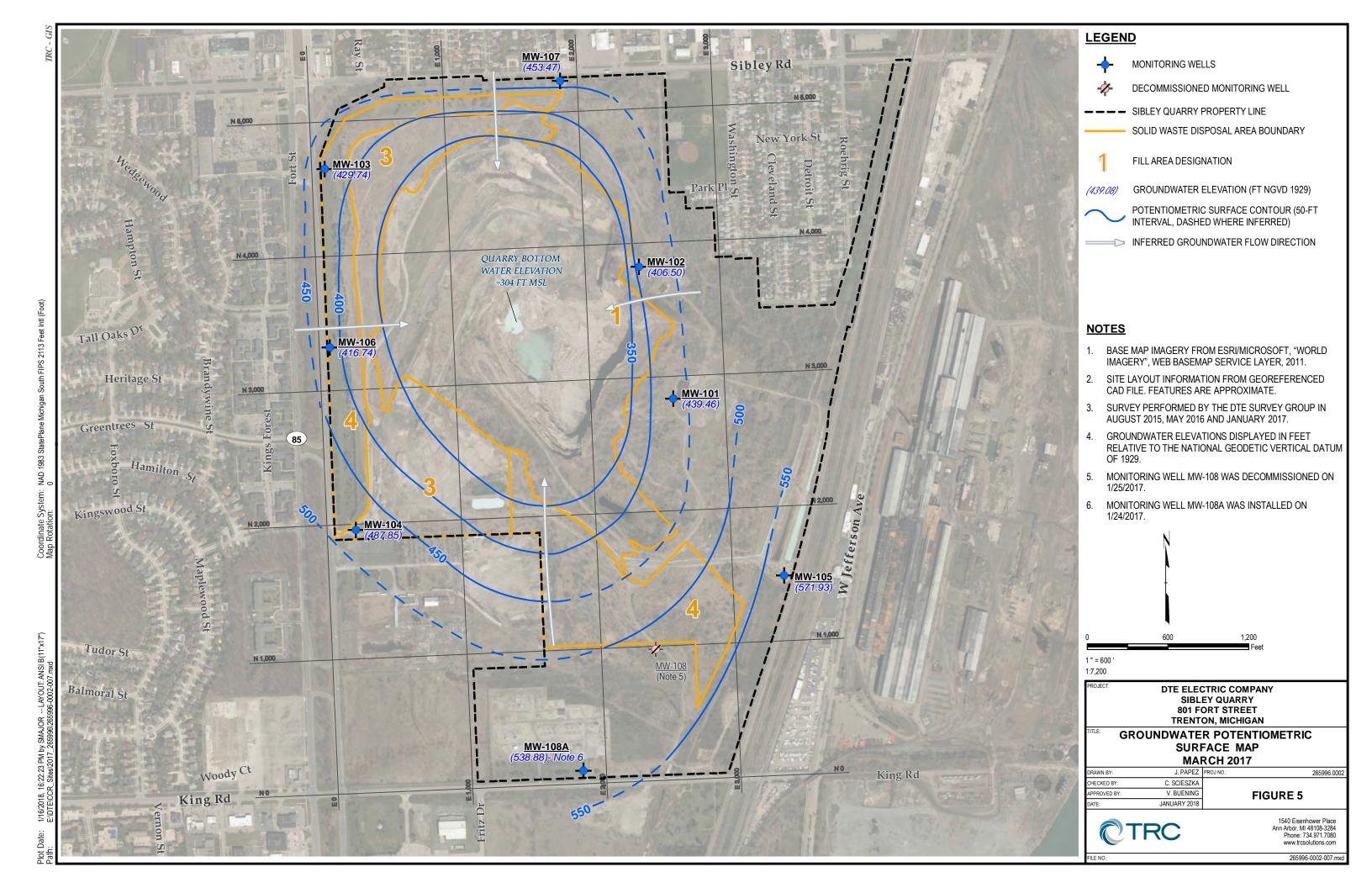
NTU - nephelometric turbidity units.

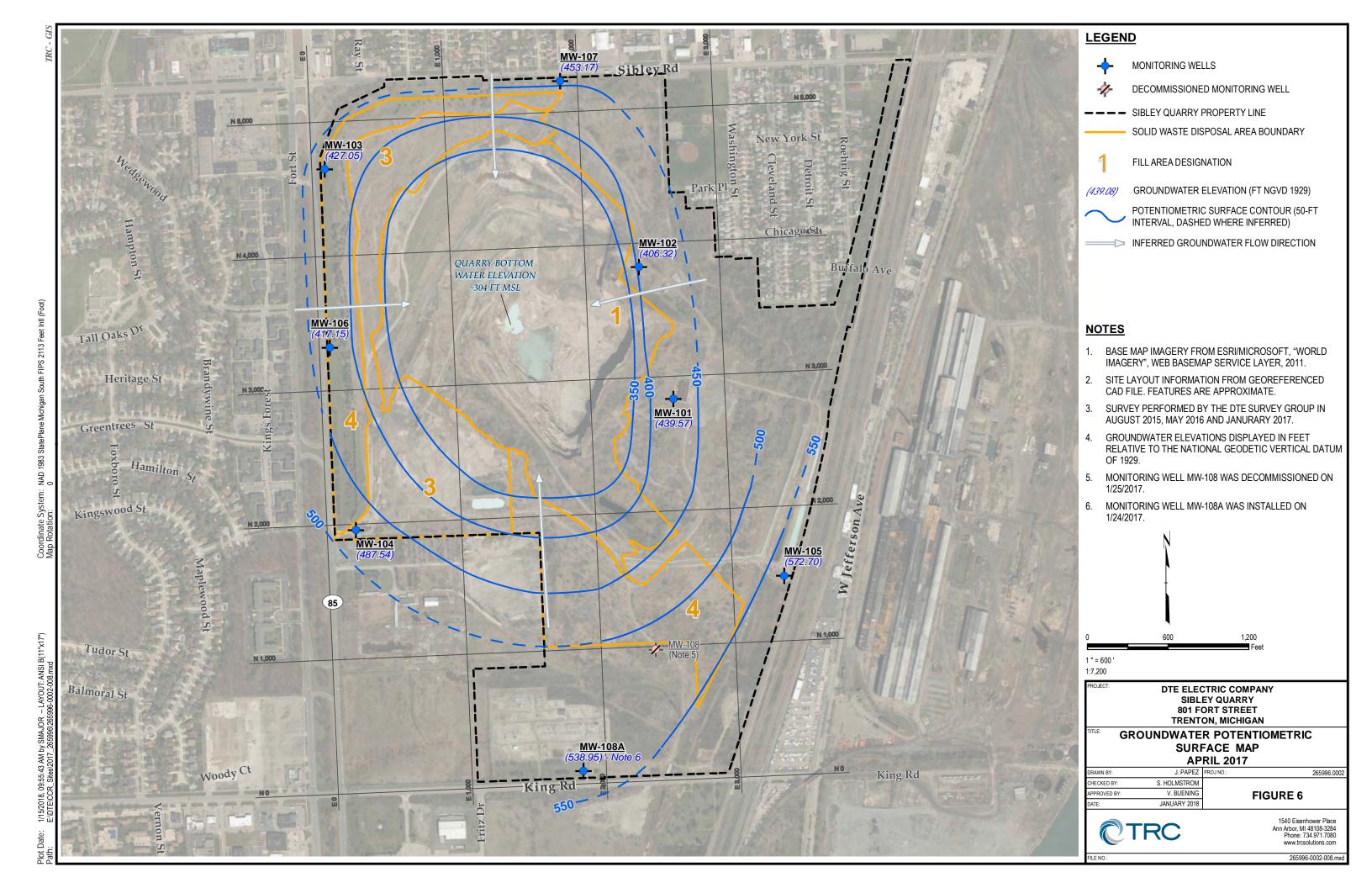


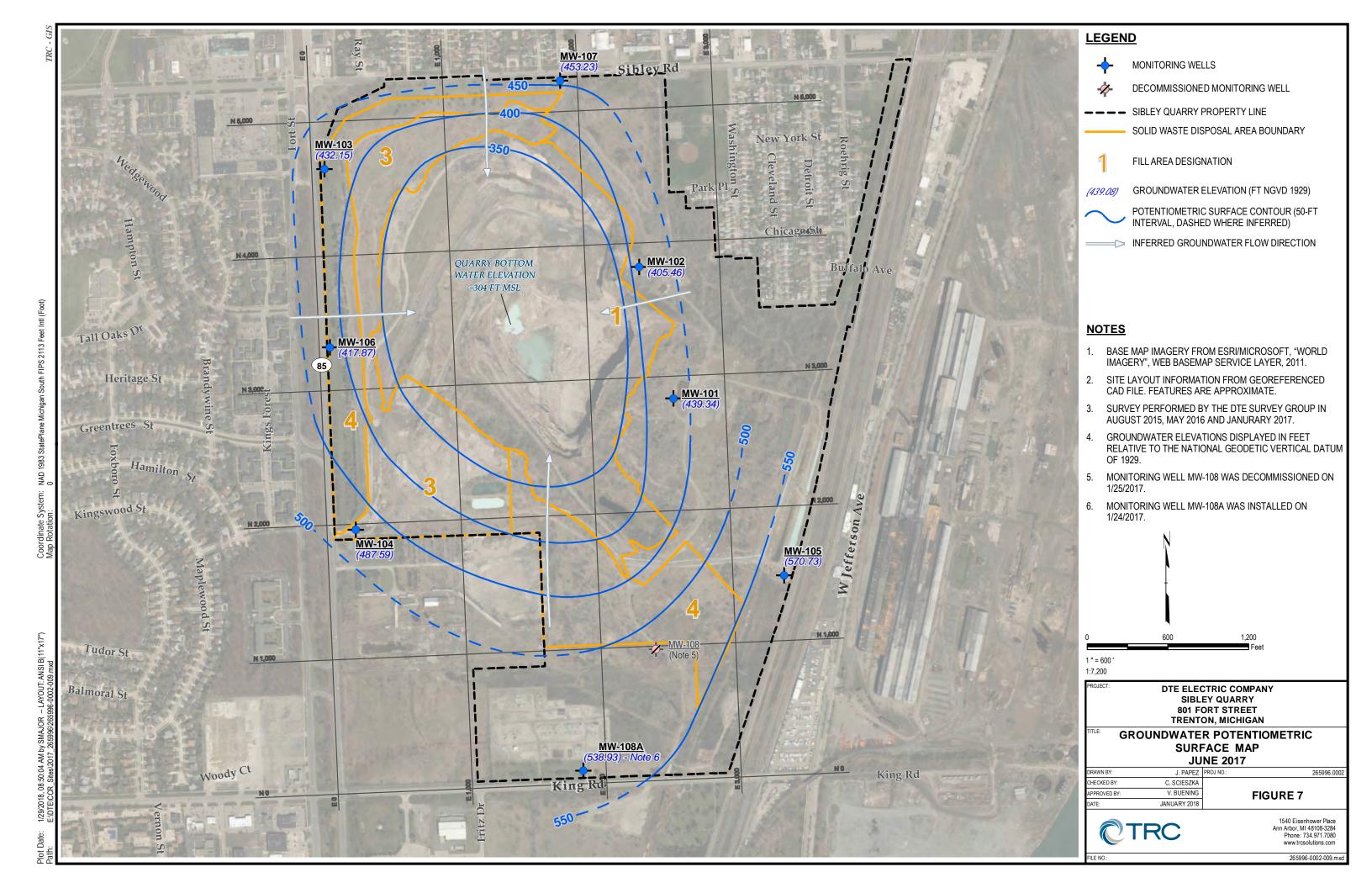


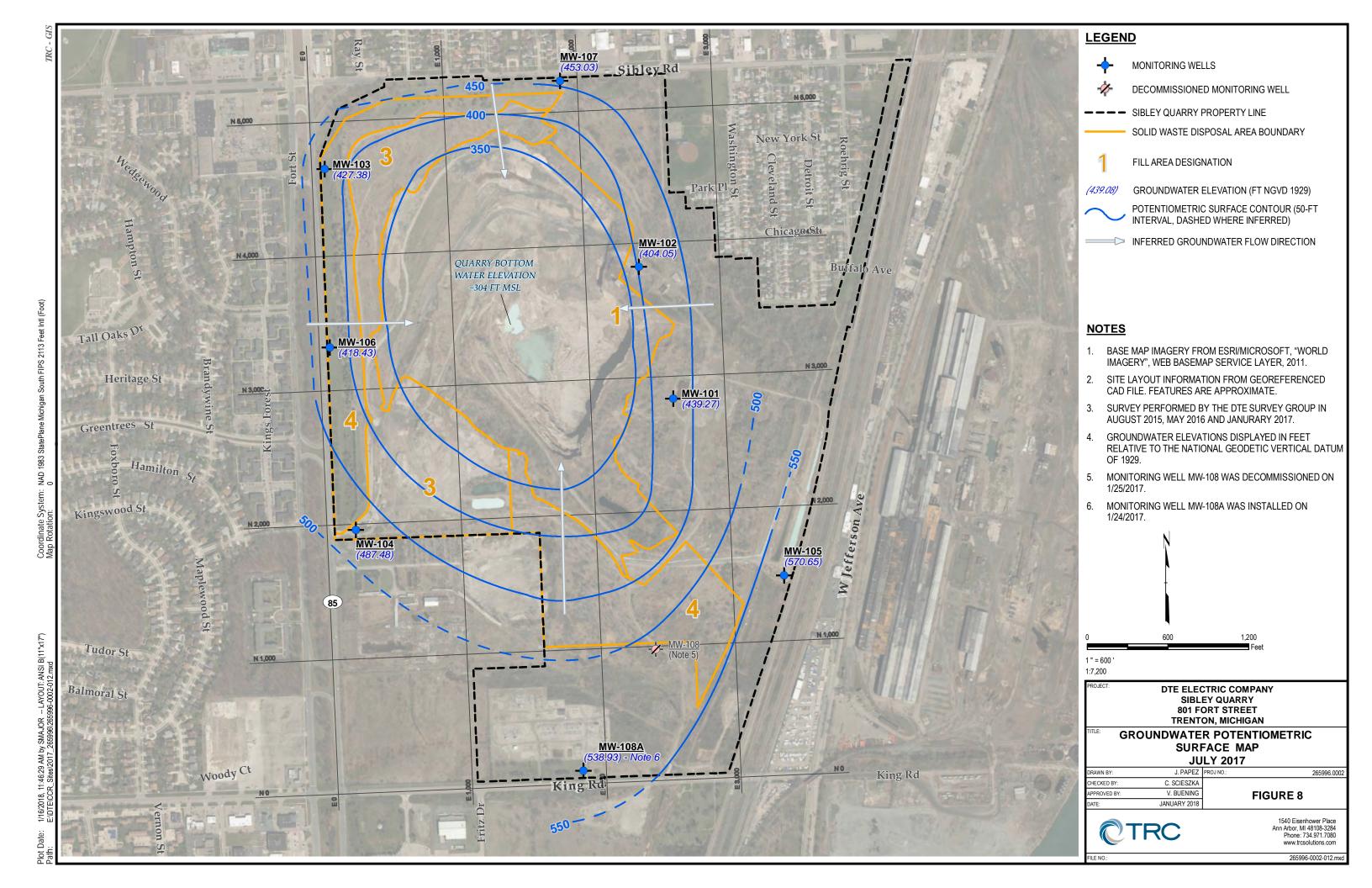












# Appendix B Data Quality Review

## Laboratory Data Quality Review Groundwater Monitoring Event September 2017 DTE Electric Company Sibley Quarry Landfill (DTE SQLF)

Groundwater samples were collected by TRC for the September 2017 sampling event. Samples were analyzed for anions, pH, total metals, total dissolved solids, and alkalinity by Test America Laboratories, Inc. (Test America), located in Canton, Ohio. The laboratory analytical results are reported in laboratory report J85421-1.

During the September 2017 sampling event, a groundwater sample was collected from each of the following wells:

• MW-101 • MW-103 • MW-105 • MW-107

• MW-102 • MW-104 • MW-106 • MW-108A

Each sample was analyzed for the following constituents:

Analyte Group	Method			
Anions (Chloride, Fluoride, Sulfate)	EPA 9056A			
рН	EPA 9040C			
Total Metals	EPA 6010B			
Total Dissolved Solids	SM 2540C			
Alkalinity	SM 2320B			

TRC reviewed the laboratory data to assess data usability. The following sections summarize the data review procedure and the results of the review.

#### **Data Quality Review Procedure**

The analytical data were reviewed using the USEPA National Functional Guidelines for Inorganic Superfund Data Review (USEPA, 2017). The following items were included in the evaluation of the data:

- Sample receipt, as noted in the cover page or case narrative;
- Technical holding times for analyses;
- Data for method blanks. Method blanks are used to assess potential contamination arising from laboratory sample preparation and/or analytical procedures;
- Percent recoveries for matrix spike (MS) and matrix spike duplicates (MSD). Percent recoveries
  are calculated for each analyte spiked and used to assess bias due to sample matrix effects;
- Reporting limits (RLs) compared to project-required RLs;

- Data for blind field duplicates. Field duplicate samples are used to assess variability introduced by the sampling and analytical processes;
- Data for laboratory control samples (LCSs). The LCSs are used to assess the accuracy of the analytical method using a clean matrix;
- Data for laboratory duplicates. The laboratory duplicates are replicate analyses of one sample and are used to assess the precision of the analytical method; and
- Overall usability of the data.

This data usability report addresses the following items:

- Usability of the data if quality control (QC) results suggest potential problems with all or some of the data;
- Actions regarding specific QC criteria exceedances.

#### **Review Summary**

The data quality objectives and laboratory completeness goals for the project were met, and the data are usable for their intended purpose. A summary of the data quality review, including non-conformances and issues identified in this evaluation are noted below.

- Appendix III constituents will be utilized for the purposes of a detection monitoring program.
- Data are usable for the purposes of the detection monitoring program.
- When the data are evaluated through a detection monitoring statistical program, findings below may be used to support the removal of outliers.

#### **QA/QC Sample Summary:**

- Target analytes were not detected in the method blank.
- Dup-01 corresponds with MW-105; relative percent differences (RPDs) between the parent and duplicate sample were within the QC limits.
- Laboratory duplicates were performed on sample MW-108A for alkalinity and on sample MW-101 for pH; RPDs between the parent and duplicate sample were within the QC limits.
- MS/MSD analyses were performed on sample MW-101 for anions (chloride, fluoride, and sulfate). The chloride recovery in the MSD was below the lower laboratory control limit. Chloride sample results may be potentially biased low. However, chloride results for this sampling event are within the historical range. The sulfate recoveries in the MS/MSD were below the lower laboratory control limits. The sulfate concentration in the parent sample was >4x the spike concentration; therefore, the laboratory control limits are not applicable. Data usability is not affected.
- The laboratory report had been revised to report the fluoride data to the MDL due to elevated fluoride reporting limits.

### Appendix C Statistical Background Limits



Date: January 15, 2018

To: DTE Electric Company

From: Darby Litz, TRC

Sarah Holmstrom, TRC

Jane Li, TRC

**Project No.:** 265996.0002.0000 Phase 001, Task 001

Subject: Background Statistical Evaluation – DTE Electric Company, Sibley Quarry Landfill,

Trenton, Michigan

Pursuant to the United States Environmental Protection Agency's (U.S. EPA's) Resource Conservation and Recovery Act (RCRA) Federal Final Rule for Hazardous and Solid Waste Management System Disposal of Coal Combustion Residuals from Electric Utilities (herein after "the CCR Rule") promulgated on April 17, 2015, the owner or operator of a CCR Unit must collect a minimum of eight rounds of background groundwater data to initiate a detection monitoring program and evaluate statistically significant increases above background (40 CFR §257.94). This memorandum presents the background statistical limits derived for the DTE Electric Company (DTE Electric) Sibley Quarry Landfill (SQLF) CCR unit.

The SQLF is a licensed Type III solid waste disposal facility owned and operated by DTE Electric. The disposal facility currently receives the majority of CCR from the Trenton Channel and River Rouge Power Plants. In addition, a small amount of CCR is also received from the Monroe Power Plant. The SQLF is operated under the current operating license number 9394 in accordance with Michigan Part 115 of the Natural Resources and Environmental Protection Act (NREPA), PA 451 of 1994, as amended.

A groundwater monitoring system has been established for SQLF CCR unit (TRC, October 2017), which established the following locations for detection monitoring.

MW-101 MW-102 MW-103 MW-105

MW-107 MW-108A

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MW-104

MW-106

Following the baseline data collection period (August 2016 through September 2017), the background data for the SQLF CCR Unit were evaluated in accordance with the *Groundwater Statistical Evaluation Plan* (Stats Plan) (TRC, October 2017). Background data were evaluated utilizing ChemStat<sup>TM</sup> statistical software. ChemStat<sup>TM</sup> is a software tool that is commercially available for performing statistical evaluation consistent with procedures outlined in U.S. EPA's Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities (Unified Guidance; UG). Within the ChemStat<sup>TM</sup> statistical program (and the UG), prediction limits (PLs) were selected to perform the statistical calculation for background limits. Use of PLs is recommended by the UG to provide high statistical power and is an acceptable approach for intrawell detection monitoring under the CCR rule. PLs were calculated for each of the CCR Appendix III parameters. The following narrative describes the methods employed and the results obtained and the ChemStat<sup>TM</sup> output files are included as an attachment.

The set of eight background wells utilized for the SQLF CCR Unit includes MW-101 through MW-107 and MW-108A. An intrawell statistical approach requires that each of the monitoring system wells doubles as the background and compliance well, where data from each individual well during a detection monitoring event is compared to a statistical limit developed using the background/baseline dataset from that same well. The background evaluation included the following steps:

- Review of data quality checklists for the baseline/background data sets for CCR Appendix III constituents;
- Graphical representation of the baseline data as time versus concentration (T v. C) by well/constituent pair;
- Outlier testing of individual data points that appear from the graphical representations as potential outliers;
- Evaluation of percentage of nondetects for each baseline/background well-constituent (w/c) pair;
- Distribution of the data; and
- Calculation of the upper PLs for each cumulative baseline/background data set (upper and lower PLs were calculated for field pH).

The results of these evaluations are presented and discussed below.

#### **Data Quality**

Data from each sampling round were evaluated for completeness, overall quality and usability, method-specified sample holding times, precision and accuracy, and potential sample contamination. The review was completed using the following quality control (QC) information which at a minimum included chain-of-custody forms, investigative sample results including blind field duplicates, and, as provided by the laboratory, method blanks, laboratory control spikes, laboratory duplicates. The data were found to be complete and usable for the purposes of the CCR monitoring program.

#### Time versus Concentration Graphs

The time versus concentration (T v. C) graphs (Attachment A) show potential or suspect outliers for anions (chloride, fluoride, and sulfate) at MW-101 on 1/19/2017, and for total dissolved solids (TDS) at MW-106 on 4/24/2017.

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

#### **Outlier Testing**

Outlier removal from the background data set is summarized in Table 1. Probability plots (Attachment B) were used to further evaluate the potential outliers in anion data for MW-101 and TDS data for MW-106 that were identified in the T v. C graphs (Attachment A). In general, probability plots of the data residuals for MW-101 show that anion data collected on 1/19/2017 were from a different distribution than the remaining data. Probability plots of the data residuals for MW-106 show that the (TDS) data collected on 4/24/2017 were from a different distribution than the remaining data. Prior to outlier removal, the anion parameters for MW-101 and TDS for MW-106 exhibited a non-normal distribution. The data sets for most of the parameters exhibited a normal distribution after the removal of these outliers. As such, anion data collected from monitoring well MW-101 on 1/19/2017 and TDS data collected from monitoring well MW-106 on 4/24/2017 were removed from the background data set used to calculate the statistical limits.

#### Distribution of the Data Sets

ChemStat<sup>TM</sup> was utilized to evaluate each data set for normality. If the skewness coefficient was calculated to be between negative one and one, then the data were assumed to be approximately normally distributed. If the skewness coefficient was calculated as greater than one (or less than negative one) then the calculation was performed on the natural log (Ln) of the data. If the Ln of the data still determined that the data appeared to be skewed, then the Shapiro-Wilk test of normality (Shapiro-Wilk) was performed. The Shapiro-Wilk statistic was calculated on both non-transformed data, and the Ln-transformed data. If the Shapiro-Wilk statistic indicated that normal distributional assumptions were not valid, then the parameter was considered a candidate for non-parametric statistical evaluation. The data distributions are summarized in Table 2.

#### **Prediction Limits**

Table 2 presents the calculated PLs for the background/baseline data sets. For normal and lognormal distributions, PLs are calculated for 95 percent confidence using parametric methods. For nonnormal background datasets, a nonparametric PL is utilized, resulting in the highest value from the background

dataset as the PL. The achieved confidence levels for nonparametric prediction limits depend entirely on the number of background data points, which are shown in the ChemStat<sup>TM</sup> outputs. Verification resampling (1 of 2) is recommended per the Stats Plan and UG to achieve performance standards specified in the CCR rules.

#### **Attachments**

Table 1 – Summary of Outlier Evaluation

Table 2 – Summary of Descriptive Statistics and Prediction Limit Calculations

Attachment A – Background Concentration Time-Series Charts

Attachment B – Probability Plots for MW-101 and MW-106 Outlier Evaluation

Attachment C − ChemStat<sup>TM</sup> Prediction Limit Outputs

**Tables** 

#### Table 1

### Summary of Outlier Evaluation Background Statistical Evaluation

DTE Electric Company – Sibley Quarry Landfill

Parameter	Units	Monitoring Well	Sample Date	Data Outlier	Basis for Removal of Outlier
Chloride	mg/L	MW-101	01/19/17	31	Anion analysis for this sample had anomalously low results.
Fluoride	mg/L	MW-101	01/19/17	0.34	Anion analysis for this sample had anomalously low results.
Sulfate	mg/L	MW-101	01/19/17	110	Anion analysis for this sample had anomalously low results.
Total Dissolved Solids	mg/L	MW-106	04/24/17	6,100	Anomalously high concentration.

#### Table 2

### Summary of Descriptive Statistics and Prediction Limit Calculations Background Statistical Evaluation DTE Electric Company – Sibley Quarry Landfill

Monitoring	Skewness Test		Shapiro-W (5% Critic		Outliers	Prediction Limit	Prediction Limit			
Well	Un-Transformed Data Natural Log Transformed Data		Un-Transformed Data	Natural Log Transformed Data	Removed	Test				
Appendix III										
Boron (ug/L)										
MW-101	-1 < -0.328311 < 1				N	Parametric	280			
MW-102	>50% Non-Detect				N	Non-Parametric	200			
MW-103	-1 < -0.276469 < 1				N	Parametric	810			
MW-104	-1 < 0.97111 < 1				N	Parametric	970			
MW-105	-1 < 0 < 1				N	Parametric	2,600			
MW-106	-1 < 0.212536 < 1				N	Parametric	810			
MW-107	-1 < -0.309839 < 1				N	Parametric	1,500			
MW-108A	-1 < -0.493382 < 1				N	Parametric	1,400			
Calcium (ug/	(L)					•				
MW-101	1.60163 > 1	1.48316 > 1	0.818 > 0.761295	0.818 > 0.787381	N	Non-Parametric	270,000			
MW-102	-1 < -0.27275 < 1				N	Parametric	310,000			
MW-103	-1 < 0.883789 < 1				N	Parametric	630,000			
MW-104	-1 < -0.992966 < 1				N	Parametric	530,000			
MW-105	-1 < -0.12077 < 1				N	Parametric	830,000			
MW-106	-1 < -0.781033 < 1	-			N	Parametric	650,000			
MW-107	-1 < -0.221716 < 1				N	Parametric	1,500,000			
MW-108A	-1 < 0.383367 < 1				N	Parametric	470,000			
Chloride (mg	1/L)					•				
MW-101	-1 < -0.358608 < 1				Y	Parametric	200			
MW-102	-1 < 0.347067 < 1				N	Parametric	270			
MW-103	-1 < -0.660484 < 1				N	Parametric	160			
MW-104	1.07244 > 1	-1 < 0.867122 < 1			N	Parametric	800			
MW-105	-1 < -0.596147 < 1				N	Parametric	4,800			
MW-106	-1 < -0.209922 < 1				N	Parametric	130			
MW-107	-1 < -0.243998 < 1				N	Parametric	21,000			
MW-108A	-1 < -0.391042 < 1				N	Parametric	1,900			
Fluoride (mg			,		"	•				
MW-101	-1 < -0.6158 < 1				Y	Parametric	2.1			
MW-102	-1 < -0.519861 < 1				N	Parametric	1.9			
MW-103	-1 < 0.302615 < 1				N	Parametric	2.1			
MW-104	1.16993 > 1	-1 < 0.717499 < 1			N	Parametric	2.8			
MW-105	>50% Non-Detect				N	Non-Parametric	5.8			
MW-106	1.90134 > 1	1.49177 > 1	0.829 > 0.721988	0.829 > 0.814033	N	Non-Parametric	3.0			
MW-107	>50% Non-Detect				N	Non-Parametric	2.5			
MW-108A	3.21441 > 1	2.11602 > 1	0.829 > 0.729779	0.829 > 0.719407	N	Non-Parametric	2.5			

#### Notes:



ug/L = micrograms per liter mg/L = milligrams per liter SU = standard units

#### Table 2

### Summary of Descriptive Statistics and Prediction Limit Calculations Background Statistical Evaluation DTE Electric Company – Sibley Quarry Landfill

Monitoring	Skewness Test		Shapiro-V (5% Critic		Outliers	Prediction Limit	Prediction			
Well	Un-Transformed Data	Natural Log Transformed Data	Un-Transformed Data	Natural Log Transformed Data	Removed	Test	Limit			
pH, Field (SU	pH, Field (SU)									
MW-101	2.1118 > 1	2.09114 > 1	0.818 > 0.585097	0.818 > 0.595294	N	Non-Parametric	6.8 - 7.8			
MW-102	1.41851 > 1	1.30393 > 1	0.829 > 0.808507	0.829 > 0.824506	N	Non-Parametric	6.5 - 7.6			
MW-103	2.2049 > 1	2.19692 > 1	0.818 > 0.532446	0.818 > 0.539495	N	Non-Parametric	6.7 - 7.6			
MW-104	2.13417 > 1	2.11519 > 1	0.818 > 0.582346	0.818 > 0.593527	N	Non-Parametric	6.8 - 7.9			
MW-105	1.98233 > 1	1.93312 > 1	0.818 > 0.649239	0.818 > 0.666586	N	Non-Parametric	6.6 - 7.9			
MW-106	1.80375 > 1	1.71426 > 1	0.829 > 0.720982	0.829 > 0.738664	N	Non-Parametric	6.5 - 7.6			
MW-107	2.33039 > 1	2.30908 > 1	0.829 > 0.552168	0.829 > 0.563482	N	Non-Parametric	6.5 - 7.6			
MW-108A	-1.59031 < -1	-1.60026 < -1	0.818 > 0.776489	0.818 > 0.773893	N	Non-Parametric	6.7 - 6.9			
Sulfate (mg/l	-)									
MW-101	-1 < 0.115199 < 1			-	Υ	Parametric	740			
MW-102	-1 < -0.759582 < 1				N	Parametric	770			
MW-103	-1 < -0.391042 < 1				N	Parametric	2,100			
MW-104	-1 < -0.516398 < 1				N	Parametric	1,900			
MW-105	-1.33333 < -1	-1.47869 < -1	0.818 > 0.816259	0.818 > 0.788157	N	Non-Parametric	2,000			
MW-106	-1 < -0.176583 < 1			-	N	Parametric	2,100			
MW-107	-1 < 0.96 < 1			-	N	Parametric	3,800			
MW-108A	-1 < -0.749816 < 1				N	Parametric	1,100			
Total Dissolv	ved Solids (mg/L)									
MW-101	-1 < 0 < 1				N	Parametric	1,400			
MW-102	-1 < -0.777592 < 1				N	Parametric	1,800			
MW-103	-1 < 0.185989 < 1			-	N	Parametric	3,700			
MW-104	-1 < 0.353863 < 1				N	Parametric	4,100			
MW-105	-1 < 0.482827 < 1			-	N	Parametric	9,700			
MW-106	-1.25109 < -1	-1.322 < -1	0.818 > 0.810824	0.818 > 0.799426	Υ	Non-Parametric	3,200			
MW-107	-1 < -0.136905 < 1			-	N	Parametric	41,000			
MW-108A	-1 < -0.330962 < 1				N	Parametric	4,900			

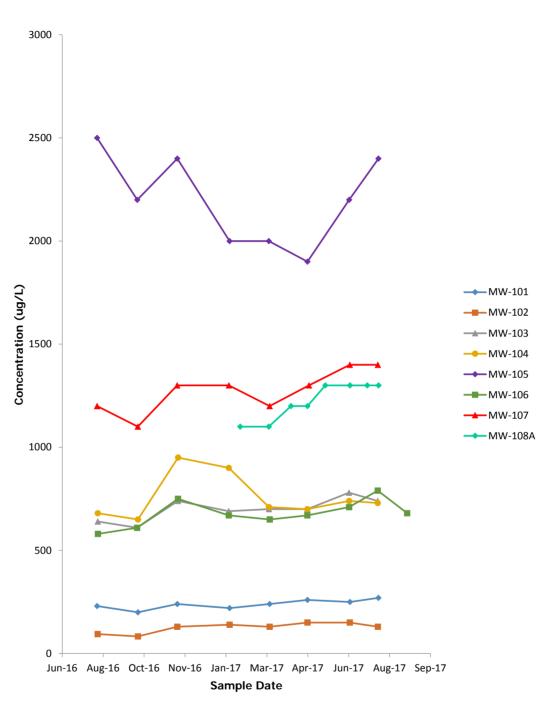
#### Notes:



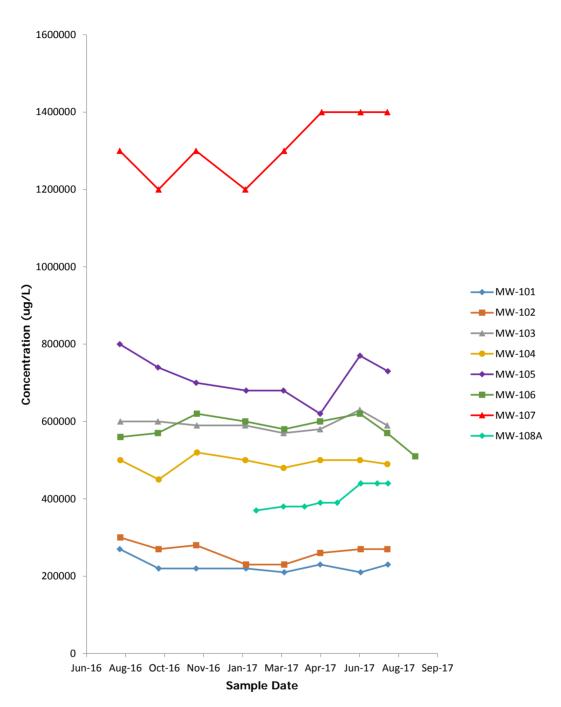
ug/L = micrograms per liter mg/L = milligrams per liter SU = standard units

# Attachment A Background Concentration Time-Series Charts

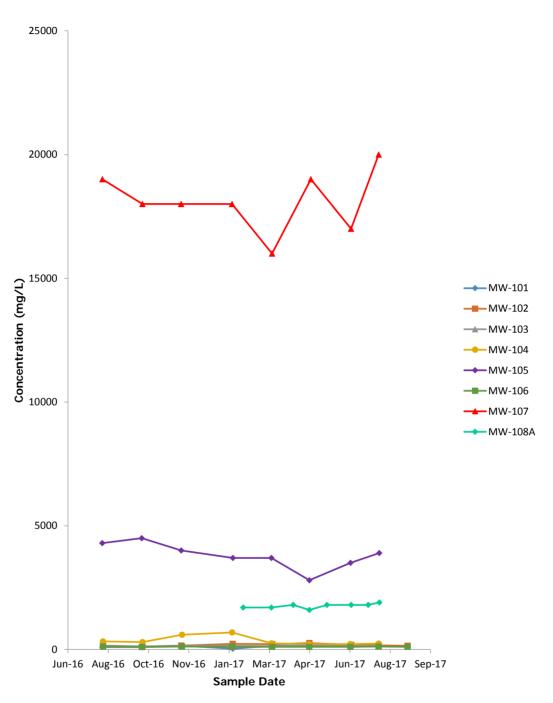
### Time-Series Plots DTE Electric Company - Sibley Quarry Landfill Trenton, Michigan Boron



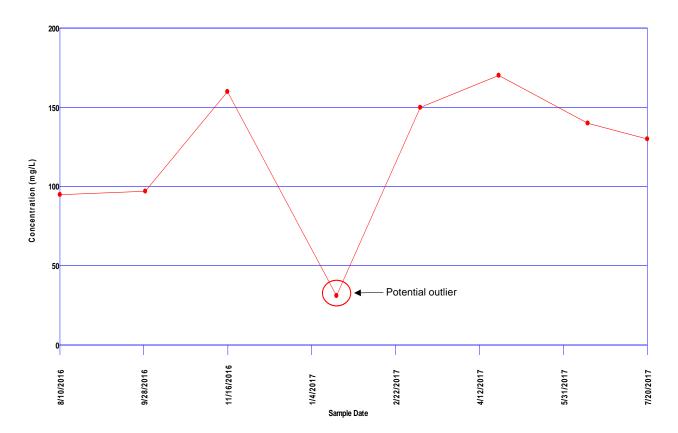
### Time-Series Plots DTE Electric Company - Sibley Quarry Landfill Trenton, Michigan Calcium



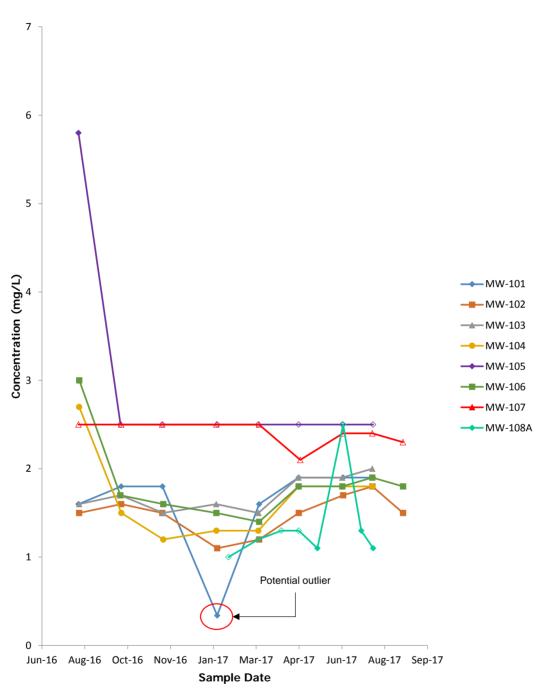
### Time-Series Plots DTE Electric Company - Sibley Quarry Landfill Trenton, Michigan Chloride



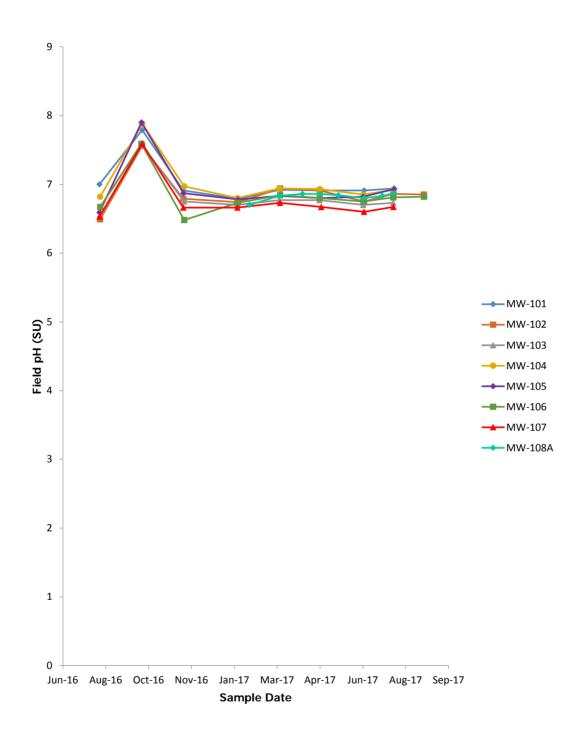
## Time-Series Plots DTE Electric Company - Sibley Quarry Landfill Trenton, Michigan MW-101 Chloride



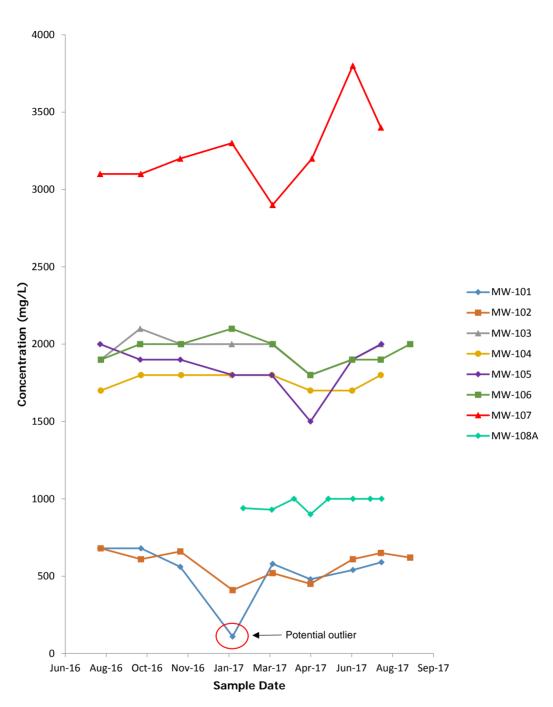
### Time-Series Plots DTE Electric Company - Sibley Quarry Landfill Trenton, Michigan Fluoride



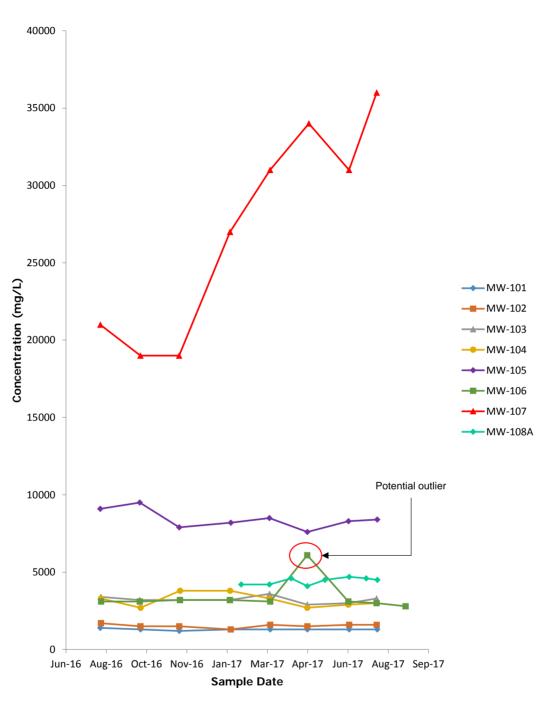
### Time-Series Plots DTE Electric Company - Sibley Quarry Landfill Trenton, Michigan pH, Field



### Time-Series Plots DTE Electric Company - Sibley Quarry Landfill Trenton, Michigan Sulfate



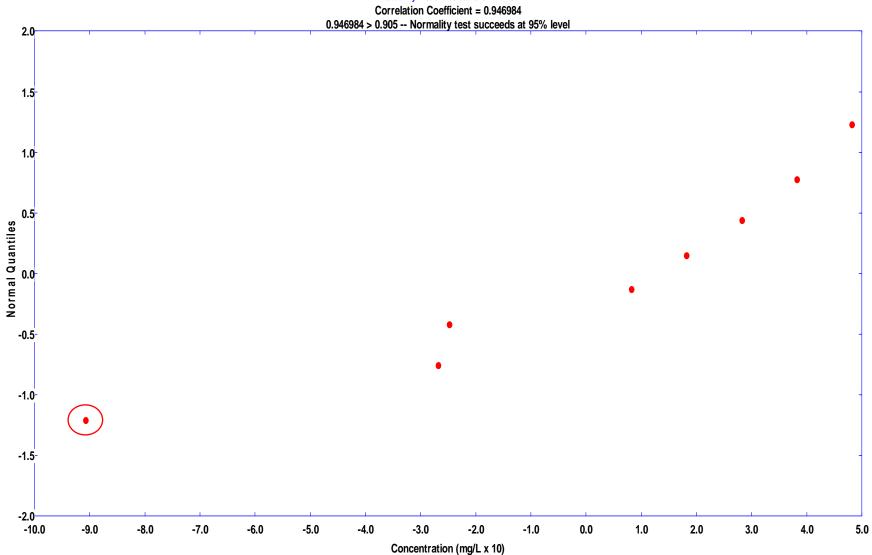
### Time-Series Plots DTE Electric Company - Sibley Quarry Landfill Trenton, Michigan Total Dissolved Solids



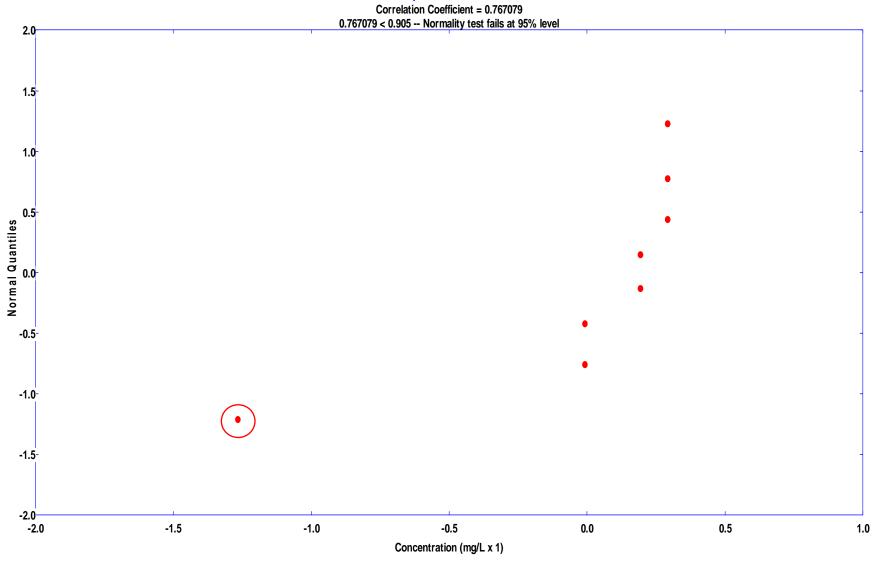
#### **Attachment B**

Probability Plots for MW-101 and MW-106 Outlier Evaluation

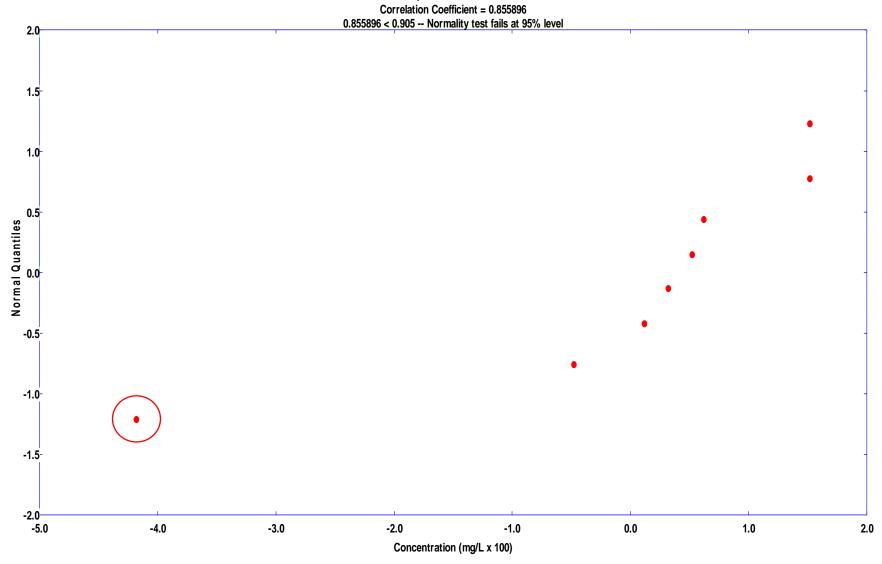
Chloride Probability Plot of Residuals for MW-101



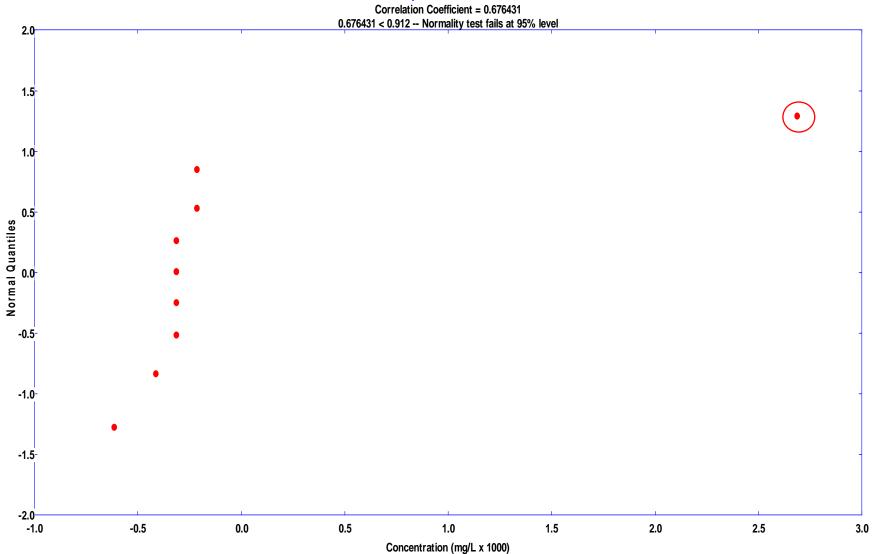
Fluoride Probability Plot of Residuals for MW-101



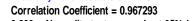
Sulfate Probability Plot of Residuals for MW-101

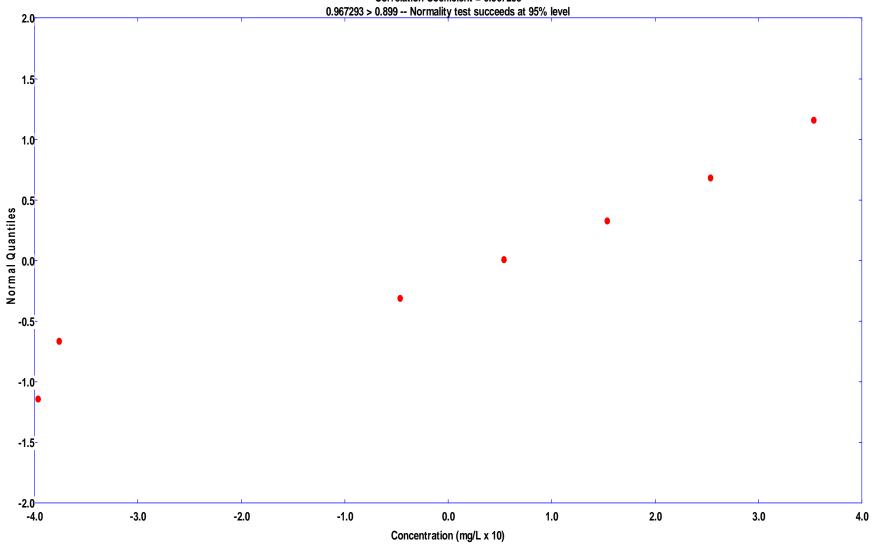


#### Total Dissolved Solids Probability Plot of Residuals for MW-106

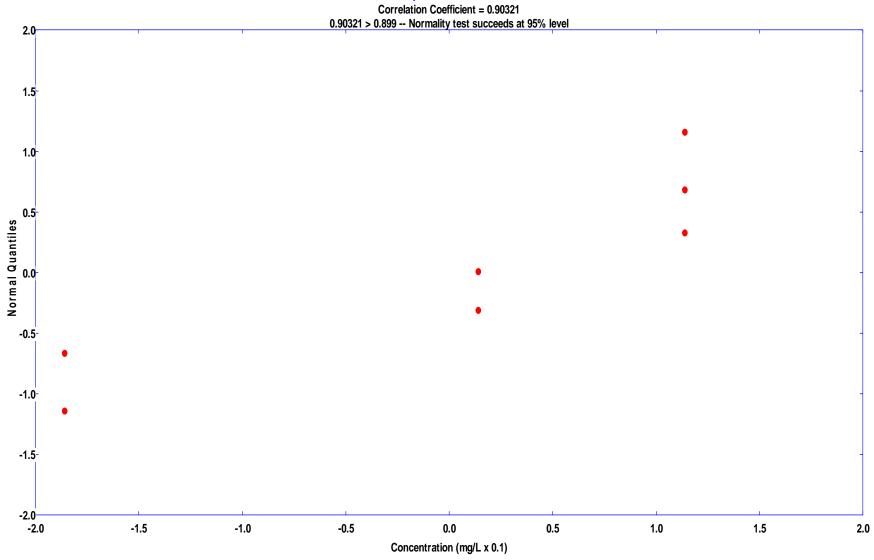




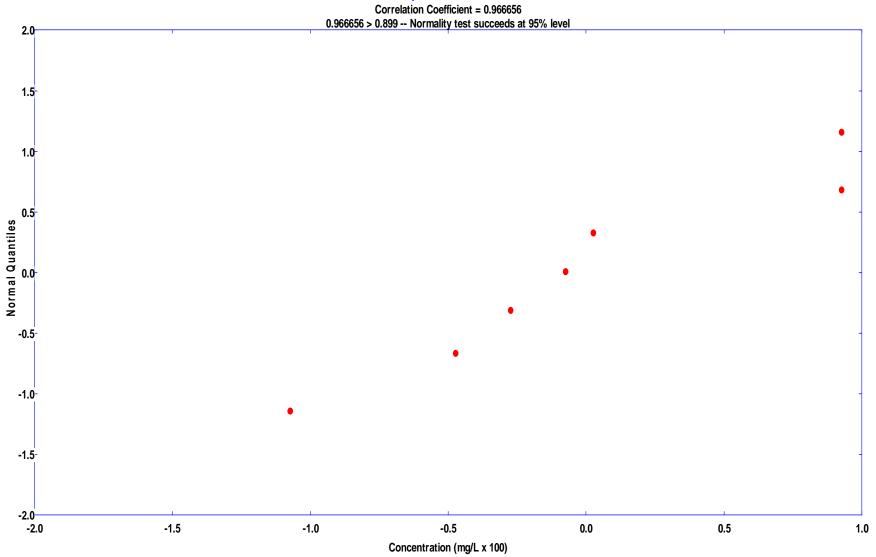






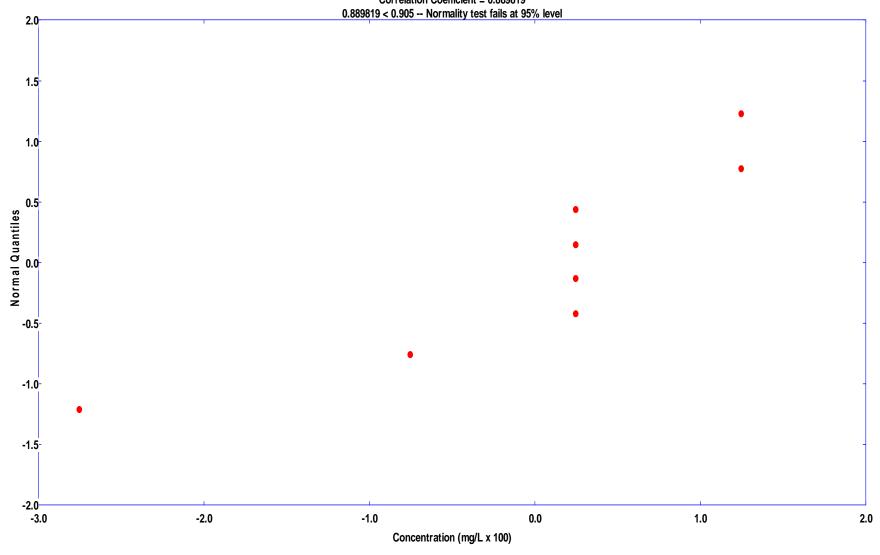






#### Total Dissolved Solids Probability Plot of Residuals for MW-106





### **Technical Memorandum**

# $\label{eq:attachment} Attachment \ C$ $\label{eq:ChemStat} ChemStat^{TM} \ Prediction \ Limit \ Outputs$

Parameter: Boron

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	230
	9/29/2016	200
	11/16/2016	240
	1/19/2017	220
	3/9/2017	240
	4/24/2017	260 B
	6/15/2017	250
	7/20/2017	270 B

From 8 baseline samples Baseline mean = 238.75 Baseline std Dev = 22.3207

Date	Samples	Mean	Interval	Significant
9/20/2017	1	280	[0, 283.604]	FALSE

Intra-Well Comparison for MW-102

Parameter: Boron
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 75% Future Samples (k) = 1 Recent Dates = 1 Baseline Measurements (n) = 8 Maximum Baseline Concentration = 200 Confidence Level = 88.9% False Positive Rate = 11.1%

<b>Baseline Measurements</b>	Date	Value
	8/11/2016	94
	9/29/2016	83
	11/16/2016	ND<200 J
	1/19/2017	ND<200 J
	3/9/2017	ND<200 J
	4/24/2017	ND<200 JB
	6/15/2017	ND<200 J
	7/19/2017	ND<200 JB

Date	Count	Mean	Significant
9/20/2017	1	200	FALSE

Parameter: Boron

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	640
	9/28/2016	610
	11/17/2016	740
	1/18/2017	690
	3/8/2017	700
	4/24/2017	700 B
	6/14/2017	780
	7/19/2017	740 B

From 8 baseline samples Baseline mean = 700 Baseline std Dev = 55.2914

Date	Samples	Mean	Interval	Significant
9/20/2017	1	760	[0, 811.108]	FALSE

Parameter: Boron

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	680
	9/29/2016	650
	11/17/2016	950
	1/18/2017	900
	3/8/2017	710
	4/24/2017	700 B
	6/14/2017	740
	7/19/2017	730 B

From 8 baseline samples Baseline mean = 757.5 Baseline std Dev = 107.935

Date	Samples	Mean	Interval	Significant
9/20/2017	1	760	[0, 974.396]	FALSE

Parameter: Boron

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	2500
	9/28/2016	2200
	11/16/2016	2400
	1/19/2017	2000
	3/8/2017	2000
	4/24/2017	1900 B
	6/14/2017	2200
	7/20/2017	2400 B

From 8 baseline samples Baseline mean = 2200 Baseline std Dev = 220.389

Date	Samples	Mean	Interval	Significant
9/21/2017	1	2500	[0, 2642.87]	FALSE

Parameter: Boron

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

	Baseline Samples	Date 8/11/2016 9/28/2016 11/17/2016 1/18/2017 3/9/2017 4/24/2017 6/14/2017 7/19/2017 8/24/2017	Result 580 610 750 670 650 670 B 710 790 B 680 B
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From 9 baseline samples Baseline mean = 678.889 Baseline std Dev = 65.0854

Date	Samples	Mean	Interval	Significant
9/20/2017	1	1000	[0, 806.465]	TRUE

#### **Parametric Prediction Interval Analysis**

Intra-Well Comparison for MW-107

Parameter: Boron

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

Intra-Well Unified Guid. Formula 95% One-Sided Comparison

#### **Baseline Samples**

Date	Result
8/10/2016	1200
9/29/2016	1100
11/16/2016	1300
1/18/2017	1300
3/9/2017	1200
4/26/2017	1300
6/15/2017	1400
7/19/2017	1400 B

From 8 baseline samples Baseline mean = 1275 Baseline std Dev = 103.51

For 1 recent sampling event(s)
Actual confidence level is 1.0 - (0.05/1) = 95 %
t is Percentile of Student's T-Test (0.95/1) = 0.95
Degrees of Freedom = 8 (background observations) - 1
t(0.95, 8) = 1.89458

Date Samples 9/20/2017 1

Mean

1500

Interval [0, 1483] Significant TRUE

Prediction limit (PL) is 1,500 ug/L with appropriate significant figures. Result from 9/20/17 is equal to, but does not exceed the final PL.

Parameter: Boron

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	2/1/2017	1100
	3/8/2017	1100
	4/4/2017	1200
	4/24/2017	1200 B
	5/16/2017	1300
	6/15/2017	1300
	7/6/2017	1300 B
	7/20/2017	1300 B

From 8 baseline samples Baseline mean = 1225 Baseline std Dev = 88.6405

Date	Samples	Mean	Interval	Significant
9/21/2017	1	1400	[0, 1403.12]	FALSE

Intra-Well Comparison for MW-101

Parameter: Calcium
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0% Future Samples (k) = 1 Recent Dates = 1 Baseline Measurements (n) = 8

Maximum Baseline Concentration = 270000 Confidence Level = 88.9%

False Positive Rate = 11.1%

Baseline Meas	surements	Date	Value	
Dascinie Meas	Juicinonta	8/10/2016	270000	
		9/29/2016	220000	
		11/16/2016	220000	
		1/19/2017	220000	
		3/9/2017	210000	
		4/24/2017	230000	
		6/15/2017	210000	
		7/20/2017	230000	
Date	Count	Mean	Significant	
9/20/2017	1	230000	FALSE	

Parameter: Calcium

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	300000
	9/29/2016	270000
	11/16/2016	280000
	1/19/2017	230000
	3/9/2017	230000
	4/24/2017	260000
	6/15/2017	270000
	7/19/2017	270000

From 8 baseline samples Baseline mean = 263750 Baseline std Dev = 23867.2

Date	Samples	Mean	Interval	Significant
9/20/2017	1	260000	[0, 311711]	FALSE

Parameter: Calcium Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	600000
	9/28/2016	600000
	11/17/2016	590000
	1/18/2017	590000
	3/8/2017	570000
	4/24/2017	580000
	6/14/2017	630000
	7/19/2017	590000

From 8 baseline samples Baseline mean = 593750 Baseline std Dev = 17677.7

Date	Samples	Mean	Interval	Significant
9/20/2017	1	560000	[0, 629273]	FALSE

Parameter: Calcium

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	500000
	9/29/2016	450000
	11/17/2016	520000
	1/18/2017	500000
	3/8/2017	480000
	4/24/2017	500000
	6/14/2017	500000
	7/19/2017	490000

From 8 baseline samples Baseline mean = 492500 Baseline std Dev = 20528.7

Date	Samples	Mean	Interval	Significant
9/20/2017	1	470000	[0, 533753]	FALSE

Parameter: Calcium

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	800000
	9/28/2016	740000
	11/16/2016	700000
	1/19/2017	680000
	3/8/2017	680000
	4/24/2017	620000
	6/14/2017	770000
	7/20/2017	730000

From 8 baseline samples Baseline mean = 715000 Baseline std Dev = 57071.4

Date	Samples	Mean	Interval	Significant
9/21/2017	1	700000	[0, 829685]	FALSE

Parameter: Calcium Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date 8/11/2016 9/28/2016 11/17/2016 1/18/2017 3/9/2017 4/24/2017 6/14/2017 7/19/2017 8/24/2017	Result 560000 570000 620000 600000 580000 600000 620000 570000 510000

From 9 baseline samples Baseline mean = 581111 Baseline std Dev = 34440

Date	Samples	Mean	Interval	Significant
9/20/2017	1	560000	[0, 648618]	FALSE

Parameter: Calcium

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date 8/10/2016 9/29/2016 11/16/2016 1/18/2017 3/9/2017 4/26/2017 6/15/2017	Result 1.3e+006 1.2e+006 1.3e+006 1.3e+006 1.4e+006 1.4e+006
	7/19/2017	1.4e+006

From 8 baseline samples Baseline mean = 1.3125e+006Baseline std Dev = 83452.3

Date	Samples	Mean	Interval	Significant
9/20/2017	1	1.3e+006	[0, 1.4802e+006]	FALSE

Parameter: Calcium Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	2/1/2017	370000
	3/8/2017	380000
	4/4/2017	380000
	4/24/2017	390000
	5/16/2017	390000
	6/15/2017	440000
	7/6/2017	440000
	7/20/2017	440000

From 8 baseline samples Baseline mean = 403750 Baseline std Dev = 30676.9

Date	Samples	Mean	Interval	Significant
9/21/2017	1	420000	[0, 465395]	FALSE

Parameter: Chloride Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	95
	9/29/2016	97
	11/16/2016	160
	3/9/2017	150
	4/24/2017	170
	6/15/2017	140
	7/20/2017	130

From 7 baseline samples Baseline mean = 134.571 Baseline std Dev = 29.3477

Date	Samples	Mean	Interval	Significant
9/20/2017	1	120	[0, 195.537]	FALSE

Parameter: Chloride

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	160
	9/29/2016	120
	11/16/2016	160
	1/19/2017	230
	3/9/2017	220
	4/24/2017	260
	6/15/2017	190
	7/19/2017	170
	8/24/2017	150

From 9 baseline samples Baseline mean = 184.444 Baseline std Dev = 44.4722

Date	Samples	Mean	Interval	Significant
9/20/2017	1	170	[0, 271.616]	FALSE

Parameter: Chloride

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	150
	9/28/2016	130
	11/17/2016	150
	1/18/2017	150
	3/8/2017	140
	4/24/2017	140
	6/14/2017	140
	7/19/2017	150

From 8 baseline samples Baseline mean = 143.75 Baseline std Dev = 7.44024

Date	Samples	Mean	Interval	Significant
9/20/2017	1	150	[0, 158.701]	FALSE

Parameter: Chloride

**Natural Logarithm Transformation** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	5.79909
	9/29/2016	5.70378
	11/17/2016	6.39693
	1/18/2017	6.53669
	3/8/2017	5.52146
	4/24/2017	5.39363
	6/14/2017	5.39363
	7/19/2017	5.48064

From 8 baseline samples Baseline mean = 5.77823 Baseline std Dev = 0.449501

Date	Samples	Mean	Interval	Significant
9/20/2017	1	5.52146	[0, 6.68151]	FALSE

Parameter: Chloride

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	4300
	9/28/2016	4500
	11/16/2016	4000
	1/19/2017	3700
	3/8/2017	3700
	4/24/2017	2800
	6/14/2017	3500
	7/20/2017	3900

From 8 baseline samples Baseline mean = 3800 Baseline std Dev = 520.988

Date	Samples	Mean	Interval	Significant
9/21/2017	1	4300	[0, 4846.93]	FALSE

Parameter: Chloride

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	120
	9/28/2016	100
	11/17/2016	120
	1/18/2017	110
	3/9/2017	110
	4/24/2017	110
	6/14/2017	110
	7/19/2017	120
	8/24/2017	110

From 9 baseline samples Baseline mean = 112.222 Baseline std Dev = 6.66667

Date	Samples	Mean	Interval	Significant
9/20/2017	1	140	[0, 125.29]	TRUE

Parameter: Chloride

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	19000
	9/29/2016	18000
	11/16/2016	18000
	1/18/2017	18000
	3/9/2017	16000
	4/26/2017	19000
	6/15/2017	17000
	7/19/2017	20000

From 8 baseline samples Baseline mean = 18125 Baseline std Dev = 1246.42

Date	Samples	Mean	Interval	Significant
9/20/2017	1	20000	[0, 20629.7]	FALSE

Parameter: Chloride

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	2/1/2017	1700
	3/8/2017	1700
	4/4/2017	1800
	4/24/2017	1600
	5/16/2017	1800
	6/15/2017	1800
	7/6/2017	1800
	7/20/2017	1900

From 8 baseline samples Baseline mean = 1762.5 Baseline std Dev = 91.6125

Date	Samples	Mean	Interval	Significant
9/21/2017	1	2100	[0, 1946.6]	TRUE

Parameter: Fluoride Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	1.6
	9/29/2016	1.8
	11/16/2016	1.8
	3/9/2017	1.6
	4/24/2017	1.9
	6/15/2017	1.9
	7/20/2017	1.9

From 7 baseline samples Baseline mean = 1.78571 Baseline std Dev = 0.134519

Date	Samples	Mean	Interval	Significant
9/20/2017	1	2	[0, 2.06516]	FALSE

Parameter: Fluoride Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	1.5
	9/29/2016	1.6
	11/16/2016	1.5
	1/19/2017	1.1
	3/9/2017	1.2
	4/24/2017	1.5
	6/15/2017	1.7
	7/19/2017	1.8
	8/24/2017	1.5

From 9 baseline samples Baseline mean = 1.48889 Baseline std Dev = 0.220479

Date	Samples	Mean	Interval	Significant
9/20/2017	1	1.8	[0, 1.92106]	FALSE

Parameter: Fluoride

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	1.6
	9/28/2016	1.7
	11/17/2016	1.5
	1/18/2017	1.6
	3/8/2017	1.5
	4/24/2017	1.9
	6/14/2017	1.9
	7/19/2017	2

From 8 baseline samples Baseline mean = 1.7125 Baseline std Dev = 0.195941

Date	Samples	Mean	Interval	Significant
20/2017	1	1.9	[0, 2.10624]	FALSE

Parameter: Fluoride

**Natural Logarithm Transformation** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	0.993252
	9/29/2016	0.405465
	11/17/2016	0.182322
	1/18/2017	0.262364
	3/8/2017	0.262364
	4/24/2017	0.587787
	6/14/2017	0.587787
	7/19/2017	0.587787

From 8 baseline samples Baseline mean = 0.483641 Baseline std Dev = 0.263784

Date	Samples	Mean	Interval	Significant
9/20/2017	1	0.641854	[0, 1.01372]	FALSE

Intra-Well Comparison for MW-105

False Positive Rate = 11.1%

Parameter: Fluoride
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 87.5% Future Samples (k) = 1 Recent Dates = 1 Baseline Measurements (n) = 8 Maximum Baseline Concentration = 5.8 Confidence Level = 88.9%

<b>Baseline Measurements</b>	Date	Value	
	8/10/2016	5.8	
	9/28/2016	ND<2.5 U	
	11/16/2016	ND<2.5 U	
	1/19/2017	ND<2.5 U	
	3/8/2017	ND<2.5 U	
	4/24/2017	ND<2.5 U	
	6/14/2017	ND<2.5 U	
	7/20/2017	ND<2.5 U	

Date	Count	Mean	Significant
9/21/2017	1	2.5	FALSE

**Intra-Well Comparison for MW-106** 

Parameter: Fluoride
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0% Future Samples (k) = 1 Recent Dates = 1 Baseline Measurements (n) = 9

Maximum Baseline Concentration = 3 Confidence Level = 90%

False Positive Rate = 10%

<b>Baseline Measurements</b>	Date	Value	
	8/11/2016	3	
	9/28/2016	1.7	
	11/17/2016	1.6	
	1/18/2017	1.5	
	3/9/2017	1.4	
	4/24/2017	1.8	
	6/14/2017	1.8	
	7/19/2017	1.9	
	8/24/2017	1.8	

Date	Count	Mean	Significant
9/20/2017	1	1.9	FALSE

**Intra-Well Comparison for MW-107** 

Parameter: Fluoride
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 77.7778%

Future Samples (k) = 1

Recent Dates = 1

**Date** 9/20/2017

Baseline Measurements (n) = 9

Maximum Baseline Concentration = 2.5 Confidence Level = 90%

Count

False Positive Rate = 10%

Baseline Measurements	Date	Value
	8/10/2016	ND<2.5 UF1
	9/29/2016	ND<2.5 U
	11/16/2016	ND<2.5 U
	1/18/2017	ND<2.5 U
	3/9/2017	ND<2.5 U
	4/26/2017	2.1
	6/15/2017	ND<2.4 U
	7/19/2017	ND<2.4 U
	8/24/2017	2.3 F1

Significant FALSE

Mean 1.3

Intra-Well Comparison for MW-108A

Parameter: Fluoride
Original Data (Not Transformed)
Cohen's Adjustment

Total Percent Non-Detects = 50%

Future Samples (k) = 1

Recent Dates = 1

Baseline Measurements (n) = 8

Maximum Baseline Concentration = 2.5 Confidence Level = 88.9%

Baseline Measurements	Date	Value
	2/1/2017	ND<1 U
	3/8/2017	1.2
	4/4/2017	1.3
	4/24/2017	ND<1.3 U
	5/16/2017	1.1
	6/15/2017	ND<2.5 U
	7/6/2017	ND<1.3 U
	7/20/2017	1.1

Date	Count	Mean	Significant
9/21/2017	1	1.3	FALSE

Intra-Well Comparison for MW-101

Parameter: pH, Field
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0%

Future Samples (k) = 1

Recent Dates = 1

Baseline Measurements (n) = 8

Maximum Baseline Concentration = 7.79 Confidence Level = 88.9%

**Minimum Baseline Concentration = 6.79** 

Baseline Measurements	Date	Value	
	8/10/2016	7	
	9/29/2016	7.79	
	11/16/2016	6.91	
	1/19/2017	6.79	
	3/9/2017	6.92	
	4/24/2017	6.91	
	6/15/2017	6.91	
	7/20/2017	6.94	
	1,23,2011	0.01	

Date	Count	Mean	Significant
9/20/2017	1	6.97	FALSE

**Intra-Well Comparison for MW-102** 

Parameter: pH, Field
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0% Future Samples (k) = 1

Recent Dates = 1

Baseline Measurements (n) = 9

Maximum Baseline Concentration = 7.56 Confidence Level = 90%

**Minimum Baseline Concentration = 6.49** 

False Positive Rate = 10%

<b>Baseline Measurements</b>	Date	Value
	8/11/2016	6.49
	9/29/2016	7.56
	11/16/2016	6.79
	1/19/2017	6.74
	3/9/2017	6.94
	4/24/2017	6.91
	6/15/2017	6.75
	7/19/2017	6.86
	8/24/2017	6.85

Mean 6.82 Significant FALSE Date Count 9/20/2017

**Intra-Well Comparison for MW-103** 

Parameter: pH, Field Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0% Future Samples (k) = 1

Recent Dates = 1

Baseline Measurements (n) = 8

Maximum Baseline Concentration = 7.58 Confidence Level = 88.9% **Minimum Baseline Concentration = 6.67** 

Baseline Measurements	Date	Value	
	8/11/2016	6.67	
	9/28/2016	7.58	
	11/17/2016	6.75	
	1/18/2017	6.7	
	3/8/2017	6.77	
	4/24/2017	6.77	
	6/14/2017	6.7	
	7/19/2017	6.73	

Date	Count	Mean	Significant
9/20/2017	1	6.76	FALSE

Intra-Well Comparison for MW-104

Parameter: pH, Field Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0% Future Samples (k) = 1

Recent Dates = 1

Baseline Measurements (n) = 8

Maximum Baseline Concentration = 7.88 Confidence Level = 88.9% False Positive Rate = 11.1%

Minimum Baseline Concentration = 6.8

Baseline Measurements	Date	Value	
	8/11/2016	6.82	
	9/29/2016	7.88	
	11/17/2016	6.97	
	1/18/2017	6.8	
	3/8/2017	6.94	
	4/24/2017	6.93	
	6/14/2017	6.85	
	7/19/2017	6.92	

Date	Count	Mean	Significant
9/20/2017	1	6.94	FALSE

**Intra-Well Comparison for MW-105** 

Parameter: pH, Field
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0% Future Samples (k) = 1

Recent Dates = 1

Baseline Measurements (n) = 8

Maximum Baseline Concentration = 7.9 Confidence Level = 88.9%

**Minimum Baseline Concentration = 6.59** 

Baseline Measurements	Date 8/10/2016 9/28/2016 11/16/2016 1/19/2017 3/8/2017 4/24/2017 6/14/2017	Value 6.59 7.9 6.87 6.78 6.83 6.8 6.82
	7/20/2017	6.93

Date	Count	Mean	Significant
9/21/2017	1	6.87	FALSE

**Intra-Well Comparison for MW-106** 

Parameter: pH, Field
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0% Future Samples (k) = 1 Recent Dates = 1

Baseline Measurements (n) = 9

Maximum Baseline Concentration = 7.59 Confidence Level = 90% **Minimum Baseline Concentration = 6.48** 

<b>Baseline Measurements</b>	Date	Value	
	8/11/2016	6.67	
	9/28/2016	7.59	
	11/17/2016	6.48	
	1/18/2017	6.73	
	3/9/2017	6.84	
	4/24/2017	6.8	
	6/14/2017	6.75	
	7/19/2017	6.81	
	8/24/2017	6.82	

Date	Count	Mean	Significant
9/20/2017	1	6.8	FALSE

Intra-Well Comparison for MW-107

Parameter: pH, Field
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0% Future Samples (k) = 1

Recent Dates = 1 Baseline Measurements (n) = 9

Maximum Baseline Concentration = 7.59 Confidence Level = 90%

**Minimum Baseline Concentration = 6.53** 

False Positive Rate = 10%

<b>Baseline Measurements</b>	Date	Value
	8/10/2016	6.53
	9/29/2016	7.59
	11/16/2016	6.66
	1/18/2017	6.66
	3/9/2017	6.73
	4/26/2017	6.67
	6/15/2017	6.6
	7/19/2017	6.67
	8/24/2017	6.65

**Mean** 6.65 Significant FALSE Date Count 9/20/2017

Intra-Well Comparison for MW-108A

Parameter: pH, Field
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0%

Future Samples (k) = 1

Recent Dates = 1

Baseline Measurements (n) = 8

Maximum Baseline Concentration = 6.87 Confidence Level = 88.9%

**Minimum Baseline Concentration = 6.7** 

Date	Value	
2/1/2017	6.7	
3/8/2017	6.83	
4/4/2017	6.86	
4/24/2017	6.86	
5/16/2017	6.84	
6/15/2017	6.8	
7/6/2017	6.83	
7/20/2017	6.87	
	2/1/2017 3/8/2017 4/4/2017 4/24/2017 5/16/2017 6/15/2017 7/6/2017	2/1/2017 6.7 3/8/2017 6.83 4/4/2017 6.86 4/24/2017 6.86 5/16/2017 6.84 6/15/2017 6.8 7/6/2017 6.83

Date	Count	Mean	Significant
9/21/2017	1	6.83	FALSE

Parameter: Sulfate

Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	680
	9/29/2016	680
	11/16/2016	560
	3/9/2017	580
	4/24/2017	480
	6/15/2017	540
	7/20/2017	590

From 7 baseline samples Baseline mean = 587.143 Baseline std Dev = 72.7357

Date	Samples	Mean	Interval	Significant
9/20/2017	1	670	[0, 738.24]	FALSE

Parameter: Sulfate

Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	680
	9/29/2016	610
	11/16/2016	660
	1/19/2017	410
	3/9/2017	520
	4/24/2017	450
	6/15/2017	610
	7/19/2017	650
	8/24/2017	620

From 9 baseline samples Baseline mean = 578.889 Baseline std Dev = 96.2347

Date	Samples	Mean	Interval	Significant
9/20/2017	1	700	[0, 767.522]	FALSE

Parameter: Sulfate

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	1900
	9/28/2016	2100
	11/17/2016	2000
	1/18/2017	2000
	3/8/2017	2000
	4/24/2017	1800
	6/14/2017	1900
	7/19/2017	2000

From 8 baseline samples Baseline mean = 1962.5 Baseline std Dev = 91.6125

Date	Samples	Mean	Interval	Significant
9/20/2017	1	1900	[0, 2146.6]	FALSE

### **Parametric Prediction Interval Analysis**

Intra-Well Comparison for MW-104

Parameter: Sulfate

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
•	8/11/2016	1700
	9/29/2016	1800
	11/17/2016	1800
	1/18/2017	1800
	3/8/2017	1800
	4/24/2017	1700
	6/14/2017	1700
	7/19/2017	1800

From 8 baseline samples Baseline mean = 1762.5 Baseline std Dev = 51.7549

For 1 recent sampling event(s)
Actual confidence level is 1.0 - (0.05/1) = 95 %
t is Percentile of Student's T-Test (0.95/1) = 0.95
Degrees of Freedom = 8 (background observations) - 1
t(0.95, 8) = 1.89458

Date	Samples	Mean	Interval	Significant
9/20/2017	1	1900	[0, 1866.5]	TRUE

Prediction limit (PL) is 1,900 mg/L with appropriate significant figures. Result from 9/20/17 is equal to, but does not exceed the final PL.

**Intra-Well Comparison for MW-105** 

Parameter: Sulfate

Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0% Future Samples (k) = 1 Recent Dates = 1 Baseline Measurements (n) = 8 Maximum Baseline Concentration = 2000 Confidence Level = 88.9% False Positive Rate = 11.1%

Baseline Measu	romonte	Date	Value	
Daseille Weast	rements			
		8/10/2016	2000	
		9/28/2016	1900	
		11/16/2016	1900	
		1/19/2017	1800	
		3/8/2017	1800	
		4/24/2017	1500	
		6/14/2017	1900	
		7/20/2017	2000	
Date	Count	Mean	Significant	
9/21/2017	1	2200	TRUE	

Parameter: Sulfate

Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	1900
	9/28/2016	2000
	11/17/2016	2000
	1/18/2017	2100
	3/9/2017	2000
	4/24/2017	1800
	6/14/2017	1900
	7/19/2017	1900
	8/24/2017	2000

From 9 baseline samples Baseline mean = 1955.56 Baseline std Dev = 88.1917

Date	Samples	Mean	Interval	Significant
9/20/2017	1	1900	[0, 2128.42]	FALSE

Parameter: Sulfate

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	3100
	9/29/2016	3100
	11/16/2016	3200
	1/18/2017	3300
	3/9/2017	2900
	4/26/2017	3200
	6/15/2017	3800
	7/19/2017	3400

From 8 baseline samples Baseline mean = 3250 Baseline std Dev = 267.261

Date	Samples	Mean	Interval	Significant
9/20/2017	1	3400	[0, 3787.06]	FALSE

## **Parametric Prediction Interval Analysis**

Intra-Well Comparison for MW-108A

Parameter: Sulfate

**Original Data (Not Transformed)** 

Non-Detects Replaced with Detection Limit

Intra-Well Unified Guid. Formula 95% One-Sided Comparison

#### **Baseline Samples**

Date	Result
2/1/2017	940
3/8/2017	930
4/4/2017	1000
4/24/2017	900
5/16/2017	1000
6/15/2017	1000
7/6/2017	1000
7/20/2017	1000

From 8 baseline samples Baseline mean = 971.25 Baseline std Dev = 41.2094

For 1 recent sampling event(s)
Actual confidence level is 1.0 - (0.05/1) = 95 %
t is Percentile of Student's T-Test (0.95/1) = 0.95
Degrees of Freedom = 8 (background observations) - 1
t(0.95, 8) = 1.89458

Date	Samples	Mean	Interval	Significant
9/21/2017	1	1100	[0, 1054.06]	TRUE

Prediction limit (PL) is 1,100 mg/L with appropriate significant figures. Result from 9/21/17 is equal to, but does not exceed the final PL.

Intra-Well Comparison for MW-101 Parameter: Total Dissolved Solids Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	1400
	9/29/2016	1300
	11/16/2016	1200
	1/19/2017	1300
	3/9/2017	1300
	4/24/2017	1300
	6/15/2017	1300
	7/20/2017	1300

From 8 baseline samples Baseline mean = 1300 Baseline std Dev = 53.4522

Date	Samples	Mean	Interval	Significant
9/20/2017	1	1400	[0, 1407.41]	FALSE

Intra-Well Comparison for MW-102 Parameter: Total Dissolved Solids Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	1700
	9/29/2016	1500
	11/16/2016	1500
	1/19/2017	1300
	3/9/2017	1600
	4/24/2017	1500
	6/15/2017	1600
	7/19/2017	1600

From 8 baseline samples Baseline mean = 1537.5 Baseline std Dev = 118.773

Date	Samples	Mean	Interval	Significant
9/20/2017	1	1500	[0, 1776.18]	FALSE

Intra-Well Comparison for MW-103 Parameter: Total Dissolved Solids Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	3400
	9/28/2016	3200
	11/17/2016	3200
	1/18/2017	3200
	3/8/2017	3600
	4/24/2017	2900
	6/14/2017	3000
	7/19/2017	3300

From 8 baseline samples Baseline mean = 3225 Baseline std Dev = 218.763

Date	Samples	Mean	Interval	Significant
9/20/2017	1	3200	[0, 3664.6]	FALSE

Intra-Well Comparison for MW-104 Parameter: Total Dissolved Solids Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/11/2016	3300
	9/29/2016	2700
	11/17/2016	3800
	1/18/2017	3800
	3/8/2017	3300
	4/24/2017	2700
	6/14/2017	2900
	7/19/2017	3000

From 8 baseline samples Baseline mean = 3187.5 Baseline std Dev = 442.194

Date	Samples	Mean	Interval	Significant
9/20/2017	1	3000	[0, 4076.09]	FALSE

Intra-Well Comparison for MW-105 Parameter: Total Dissolved Solids Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	9100
	9/28/2016	9500
	11/16/2016	7900
	1/19/2017	8200
	3/8/2017	8500
	4/24/2017	7600
	6/14/2017	8300
	7/20/2017	8400

From 8 baseline samples Baseline mean = 8437.5 Baseline std Dev = 613.974

Date	Samples	Mean	Interval	Significant
9/21/2017	1	8400	[0, 9671.28]	FALSE

**Intra-Well Comparison for MW-106** Parameter: Total Dissolved Solids
Original Data (Not Transformed)
Non-Detects Replaced with Detection Limit

Total Percent Non-Detects = 0% Future Samples (k) = 1 Recent Dates = 1 Baseline Measurements (n) = 8 Maximum Baseline Concentration = 3200 Confidence Level = 88.9% False Positive Rate = 11.1%

Baseline Measurements		Date	Value	
		8/11/2016	3100	
		9/28/2016	3100	
		11/17/2016 1/18/2017	3200	
			3200	
		3/9/2017	3100	
		6/14/2017	3100	
		7/19/2017	3000	
		8/24/2017	2800	
Date	Count	Mean	Significant	
9/20/2017	1	3100	FALSE	

Intra-Well Comparison for MW-107 Parameter: Total Dissolved Solids Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	8/10/2016	21000
	9/29/2016	19000
	11/16/2016	19000
	1/18/2017	27000
	3/9/2017	31000
	4/26/2017	34000
	6/15/2017	31000
	7/19/2017	36000

From 8 baseline samples Baseline mean = 27250 Baseline std Dev = 6819.09

Date	Samples	Mean	Interval	Significant
9/20/2017	1	27000	[0, 40953]	FALSE

Intra-Well Comparison for MW-108A Parameter: Total Dissolved Solids Original Data (Not Transformed)

Non-Detects Replaced with Detection Limit

#### Intra-Well Unified Guid. Formula 95% One-Sided Comparison

Baseline Samples	Date	Result
	2/1/2017	4200
	3/8/2017	4200
	4/4/2017	4600
	4/24/2017	4100
	5/16/2017	4500
	6/15/2017	4700
	7/6/2017	4600
	7/20/2017	4500

From 8 baseline samples Baseline mean = 4425 Baseline std Dev = 225.198

Date	Samples	Mean	Interval	Significant
9/21/2017	1	5000	[0, 4877.54]	TRUE