

April 14, 2025
File No. 25224159.00

Mr. Keith DeBlaey
Edgewater Generating Station
3739 Lakeshore Drive
Sheboygan, WI 53081

Subject: Groundwater Monitoring System Update – Certification
I-43 Ash Disposal Facility, Town of Wilson, Wisconsin

Dear Mr. DeBlaey:

The groundwater monitoring system at the I-43 Ash Disposal Facility (I43) has been updated. The monitoring network was originally certified on October 11, 2017. Monitoring well MW-306 has been added to the monitoring network as a compliance monitoring well.

This letter certifies, pursuant to 40 CFR 257.91(f), that the monitoring system is designed and constructed to meet the requirements of 40 CFR 257.91. The monitoring system also meets the requirements of NR 507.15(3). The monitoring network is sufficient to accurately represent the quality of background groundwater that has not been affected by leakage from the coal combustion residuals (CCR) unit, and the quality of groundwater passing the waste boundary of the CCR unit.

The groundwater monitoring system at I43 is a multiunit system for the following existing CCR units:

- Phase 3, Module 1
- Phase 3, Module 2
- Phase 4, Module 1

MW-306 has been added to the groundwater monitoring system as follows:

- Regional groundwater flow within the uppermost aquifer at the site is to the east. The original monitoring network was designed based on this regional flow direction.
- Interpreted groundwater flow directions in recent years have indicated that groundwater flow at the site is more northward.
- MW-306 was installed to the north of Phase 3, Module 2 in 2024 to evaluate whether groundwater elevations in this part of the site are consistent with a northerly flow direction.
- Groundwater elevations measured to date at MW-306 are consistent with northerly groundwater flow, therefore MW-306 has been added to the groundwater monitoring system as a downgradient well.
- MW-306 was installed as close as practicable to the northern boundary of the CCR unit, considering slopes and stormwater management features.





Based on the design information developed for placement in the site Operating Record to meet the requirements of 40 CFR 257.105(h)(2) and NR 506.17(2)(e) and provided for our review, the number, spacing, and depths of the monitoring system, components were determined using site-specific information in accordance with 40 CFR 257.91(b) and NR 507.15(3)(b).

The groundwater monitoring system consists of two upgradient monitoring wells and four downgradient monitoring wells, which exceeds the minimum requirements of 40 CFR 257.91(c)(1) and NR 507.15(3)(c)(1).

The multiunit groundwater monitoring system is equally as capable of detecting monitored constituents at the waste boundary of the CCR units as the individual groundwater monitoring system specified in 40 CFR 257.91(a) through (c), as required by 40 CFR 257.91(d).

Based on the installation documentation developed for placement in the site Operating Record to meet the requirements of 40 CFR 257.105(h)(2) and NR 506.17(2)(e) and provided for our review, the monitoring wells have been cased in a manner that will maintain the integrity of the monitoring well borehole and were constructed in accordance with the requirements of 40 CFR 257.91(e) and NR 507.15(3)(3).

PE CERTIFICATION

	I, Sherren C. Clark, hereby certify that the groundwater monitoring system at the I-43 Ash Disposal Facility has been designed and constructed to meet the requirements of 40 CFR 257.91. This certification is based on my review of documentation in the operating record regarding the design, installation, and development of the groundwater monitoring system components. I am a duly licensed Professional Engineer under the laws of the State of Wisconsin.	
		4/14/2025
	(signature)	(date)
	Sherren Clark	
	(printed or typed name)	
License number <u>29863-6</u>		
My license renewal date is July 31, 2026.		
Pages or sheets covered by this seal:		
Groundwater Monitoring System Update – Certification, all pages.		

Mr. Keith DeBlaey

April 14, 2025

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Sincerely,

A handwritten signature in blue ink, appearing to read 'SK' or 'SLK'.

Sherren Clark, PE
Project Director
SCS Engineers

A handwritten signature in blue ink, appearing to read 'Thomas J. Karwoski'.

Thomas J. Karwoski, PG
Senior Project Manager
SCS Engineers

MDB/REO/SCC

cc: Matt Bizjack, Alliant Energy
Jeff Maxted, Alliant Energy

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