

December 31, 2024  
File No. 25223252.00

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

Subject: Groundwater Monitoring System Update – Certification  
Edgewater Generating Station, Sheboygan, Wisconsin

Dear Mr. DeBlaey:

The groundwater monitoring system at the Edgewater Generating Station (EDG) has been updated in 2024. The monitoring network was originally certified on October 11, 2017. Monitoring well MW-304 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 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 EDG is a multiunit system for the following existing CCR units:

- EDG Slag Pond
- EDG North A-Pond (North Wisconsin Pollutant Discharge Elimination System [WPDES] Pond)
- EDG South A-Pond (South WPDES Pond)
- EDG B-Pond (Primary Pond)

Closure of the four ponds was completed in 2021. A Notification of Completion of Closure pursuant to 40 CFR 257.102(d) was entered into the CCR Operating Record on August 10, 2021.

MW-304 has been added to the groundwater monitoring system as follows:

- Prior to closure of the impoundments, groundwater flow at the site was historically outward, and MW-301, MW-302, and MW-303 were downgradient of the CCR units.
- Following closure of the impoundments, groundwater flow at the site is no longer radially outward and is now to the south-southeast.
- MW-304 was installed as close as practicable to the southeastern boundary of the CCR unit, between preexisting wells MW-302 and MW-303.





Based on the design information 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).

The groundwater monitoring system consists of one upgradient monitoring well and four downgradient monitoring wells, which exceeds the minimum requirements of 40 CFR 257.91(c)(1). The downgradient monitoring well locations are based on both historically radial groundwater flow directions observed when the CCR unit was active and current post-closure groundwater flow conditions. MW-302, MW-303, and MW-304 are in locations that were downgradient prior to closure and are still downgradient. MW-301 was downgradient prior to closure. MW-301 is not downgradient under current conditions; however, it is retained as a compliance well because it is positioned to represent sample groundwater quality in an area that was previously downgradient and could have been impacted by CCR constituents passing the waste boundary of the CCR unit prior to closure.

The groundwater monitoring system is designed to detect monitored constituents at the waste boundary of the facility as required by 40 CFR 257.91(d).

Based on the installation documentation 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). The installation documentation has been placed in the site operating record to meet the requirements of 40 CFR 257.105(h)(2).

**PE Certification**

	<p>I, Sherren C. Clark, hereby certify that the groundwater monitoring system at the Edgewater Generating Station 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.</p>
	<p> December 31, 2024</p>
	<p>(signature) (date)</p>
	<p>Sherren Clark (printed or typed name)</p>
	<p>License number _____ My license renewal date is July 31, 2026. Pages or sheets covered by this seal: Groundwater Monitoring System Update – Certification, all pages.</p>

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Sincerely,



Sherren Clark, PE  
Project Director  
SCS Engineers



Thomas J. Karwoski, PG  
Senior Project Manager  
SCS Engineers

MDB/jsn/SCC

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

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